

SAR EXEMPTION EXHIBIT

FCC

APPLICANT

Universal Electronics Inc

MODEL NAME

UEI-R39001

FCC ID

MG3-UEI-R39001

ISED ID

2575A-UEIR39001

REPORT NUMBER

HA241011-UEI-005-R04

TEST REPORT

Date of Issue
November 01, 2024

Test Site
HCT America, Inc.
1726 Ringwood Ave, San Jose, CA 95131, USA

Applicant Universal Electronics Inc

Applicant Address 201 East Sandpointe Ave 7th Floor, Santa Ana, CA 92707, U.S.A.

FCC ID MG3-UEI-R39001

ISED ID 2575A-UEIR39001

Model Name UEI-R39001

EUT Type BT (EE) MVPD Apple Remote 2.0

Modulation Type GFSK

FCC Classification Digital Transmission System (DTS)

FCC Rule Part(s) 47 CFR §2.1091

ISED Rule Part(s) RSS-247 Issue 3 (August 2023)
RSS-Gen Issue 5 Amd 2 (February 2021)

Test Procedure ANSI C63.10-2013, KDB 447498 D01 v06

The device bearing the trade name and model specified above, has been shown to comply with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures required. The results of testing in this report apply only to the product which was tested. Other similar equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

HCT America, Inc. certifies that no party to application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C 862

Tested By



John Park

Test Engineer

Reviewed By



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REVISION HISTORY

The revision history for this document is shown in table.

TEST REPORT NO.	DATE	DESCRIPTION
HA241011-UEI-005-R04	November 01, 2024	Initial Issue

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1. EUT DESCRIPTION

Model	UEI-R39001
EUT Type	BT (EE) MVPD Apple Remote 2.0
Power Supply	3 V d.c. (1.5 V d.c., x 2 AAA battery, Serial connection)
RF Specification	Bluetooth V4.2 LE (1 Mbps)
Frequency Range	2 402 MHz – 2 480 MHz
Max. RF Output Power	Peak : 7.07 dBm (5.09 mW) Max tune up power is 7.88 dBm
Modulation Type	GFSK
Number of Channels	40 Channels
Antenna Specification ²⁾	Antenna Type : Inverted F Peak Gain : 1.73 dBi
Transmitter Chain	1
Operating Environment	Indoor
Operating Temperature	0 °C ~ +50 °C

Note :

1. Antenna information is based on the document provided.

2. INTRODUCTION

2.1. LIMIT

The RF exposure from potable device, as defined by FCC, must be evaluated with respect to FCC-adopted limits for SAR in accordance with 47 CFR §2.1091.

If no other RF exposure testing or reporting are required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for SAR test exclusion.

SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and ≤ 50 mm

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table, Appendix A, KDB 447498 D01 v06, 'General RF Exposure Guidance'.

MHz	5	10	15	20	25	30	35	40	45	50	mm
150	39	77	116	155	194	232	271	310	349	387	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	164	192	219	246	274	
450	22	45	67	89	112	134	157	179	201	224	
835	16	33	49	66	82	98	115	131	148	164	
900	16	32	47	63	79	95	111	126	142	158	
1500	12	24	37	49	61	73	86	98	110	122	
1900	11	22	33	44	54	65	76	87	98	109	
2450	10	19	29	38	48	57	67	77	86	96	
3600	8	16	24	32	40	47	55	63	71	79	
5200	7	13	20	26	33	39	46	53	59	66	
5400	6	13	19	26	32	39	45	52	58	65	
5800	6	12	19	25	31	37	44	50	56	62	

Note : 10-g Extremity SAR Test Exclusion Power Threshold are 2.5 times higher than the 1g SAR Test Exclusion Threshold indicated above. These thresholds do not apply, by extrapolation or other means, to occupational exposure limits.

For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following equation according to 4.3.1 a), KDB 447498 D01 v06 :

1-g SAR Test Exclusion Thresholds

$$\frac{(\text{max. power of channel, including tuneup tolerance, mW})}{(\text{min. test separation distance, mm})} \times \left[\sqrt{f(\text{GHz})} \right] \leq 3.0 \text{ for 1-g SAR}$$

10-g SAR Test Exclusion Thresholds

$$\frac{(\text{max. power of channel, including tuneup tolerance, mW})}{(\text{min. test separation distance, mm})} \times \left[\sqrt{f(\text{GHz})} \right] \leq 7.5 \text{ for 10-g Extremity SAR}$$

3. RESULT

3.1. SUMMARY OF RESULTS

Mode	Frequency (MHz)	Measured Level (dBm)	Max Power ¹⁾ (dBm)	Max. Power (mW)	Calculated Threshold
BLE (1M)	2402	6.714	7.880	6.138	1.903
	2440	6.755	7.880	6.138	1.918
	2480	7.067	7.880	6.138	1.933

Note :

1. Maximum output power including tune-up tolerance.
2. The device is a hand-held remote control. According to the user manual, Arms are separated from the antenna with less than 5 mm and body is separated from the antenna more than 15 mm in normal use condition

Sample Calculation (Worst case) :

(max. power of channel including tune-up tolerance in mW) / (min. test separation distance) x SQRT(frequency in GHz)
= (6.138 mW) / (5 mm) x SQRT(2.480 GHz) = 1.933 ≤ 3.0

3.2. CONCLUSION

Since BLE 1M is not operating simultaneously, the calculated worst-case threshold is 1.933 at the frequency 2480 MHz, which is less than 3.0 (1-g SAR Exclusion limit), therefore SAR evaluation is not required for the EUT.

END OF TEST REPORT