

REVISED RADIO FREQUENCY EXPOSURE REPORT

FOR THE

Simplera

Model: MMT-5100*

*(See Appendix C for Manufacturer Declaration)

Report No.: 109171-11A

Date of issue: April 3, 2024

PREPARED FOR:

Jonathan Tabalujan
18000 Devonshire Street
Northridge, CA 91325-1219

PREPARED BY:

Matt Harrison
CKC Laboratories, Inc.
5046 Sierra Pines Drive
Mariposa, CA 95338

The test data contained in this report documents the observed testing parameters pertaining to and are relevant for only the sample equipment tested in the agreed upon operational mode(s) and configuration(s) as identified herein. Compliance assessment remains the client's responsibility. This report may not be used to claim product endorsement by A2LA or any government agencies. This test report has been authorized for release under quality control from CKC Laboratories, Inc.



Steve Behm

**Director of Quality Assurance & Engineering Services
CKC Laboratories, Inc.**

Revision History

Original: Testing of Simplera Model: MMT-5100 to RF Exposure.

Revision A: To update RF Exposure Mobile Equipment Assessment Power Density Calculations.

Purpose:

To demonstrate compliance with United States, Canada, Australia, New Zealand, European Union and/or United Kingdom RF Exposure requirements for Portable equipment (devices used ≤ 20 cm from the body) with power output below exemption levels or Mobile equipment (devices used > 20 cm from the body) where Maximum Permissible Exposure (MPE) Calculations apply.

Device and Antenna Operating Configuration:

Device operating at maximum output power with continuous transmission of modulated data.

Method:

This equipment is evaluated in accordance with the guidelines set forth in 47 CFR 1.1310, KDB 447498 & ANSI C95.1 for the US, Health Canada Safety Code 6 & RSS 102 for Canada, ARPANSA RPS S-1 for AU & NZ and EN 62479 or EN 62311 for EU and UK.

Other Considerations:

Report considers stand-alone equipment configurations only. RF Exposure limits are calculated at the mid-point of each operating band.

Referenced Test Reports:

The following test reports were referenced in conjunction with this assessment:

109171-3
109171-5
109171-6

Decision Rule:

Outcome of RF exposure assessment is listed in the comment section(s) below as a binary statement for simple acceptance rule according to ILAC-G8 (2019).

**RF Exposure Portable Equipment Assessment
Exemption Calculations
(Single Transmitter, Stand Alone)**

US Exemption

Power Reported is:	<input checked="" type="checkbox"/> Peak <input type="checkbox"/> Average						
Limit Used is:	<input checked="" type="checkbox"/> General Population <input type="checkbox"/> Occupational Exposure						
Criteria:	47 CFR 1.1307(b)(3)(i) Criteria A						
Operating Band MHz	Power dBm	Ant Type/Gain dBi	EIRP dBm	Sep. Dist mm	Exemption Limit		Comment
					dBm	mW	
2400-2483.5	NA	Inverted F / - 6dBi	-8.62 = 0.14mW	0.5	0	1.0	Pass

IC Exemption

Power Reported is:	<input checked="" type="checkbox"/> Peak <input type="checkbox"/> Average						
Limit Used is:	<input checked="" type="checkbox"/> General Population <input type="checkbox"/> Occupational Exposure						
Operating Band MHz	Power dBm	Ant Type/Gain dBi	EIRP dBm	Sep Dist mm	Exemption Limit		Comment
					dBm	mW	
2400-2483.5	NA	Inverted F / - 6dBi	-8.62 = 0.14mW	0.5	0	1.0	Pass

EU Exemption

Power Reported is:	<input type="checkbox"/> Peak <input checked="" type="checkbox"/> Average						
Limit Used is:	<input checked="" type="checkbox"/> General Population <input type="checkbox"/> Occupational Exposure						
Operating Band MHz	Power dBm	Ant Type/Gain dBi	EIRP dBm	Exemption Limit		Comment	
				dBm	mW		
2400-2483.5	NA	Inverted F / - 6dBi	-13.3	13	20	Pass	

Summary:

Exemptions:

Equipment demonstrating compliance by portable RF exposure exemption have been evaluated, without further testing, for use under either portable or mobile RF exposure configurations. Additional configurations including collocation or simultaneous transmission with other transmitters (including necessary separation distances) are subject to further assessment. Certain exemption criteria may define specific separation distances. It is assumed that the manufacturer shall design the equipment such that these minimum separation distance is met.

MPE Calculation Results:

Equipment demonstrating compliance with MPE calculations have been evaluated, without further testing, for use under mobile RF exposure configurations as identified herein. Additional configurations including collocation or simultaneous transmission with other transmitters (including necessary separation distances) are subject to further assessment. It is assumed that the manufacturer shall design the equipment such that the minimum separation distance of 20cm (or greater, as listed above) is met or that the manufacturer provides a protection guide (e.g. installation instructions) to the end user such that the antenna(s) may be installed in accordance with the manufacturer's instructions in such a manor to maintain the minimum separation distance.

General Comments:

The absorption and distribution of Electromagnetic energy in the body is a very complex phenomena that depends on the mass, shape and physiological condition of the body; the orientation of the body with respect to the fields; and, the electrical properties of the body and the environment. Variables that may play a substantial role in possible biological effects are those that characterize the environment (including but not limited to: ambient temperature, air velocity, relative humidity and body insulation); and those that characterize the individual (including but not limited to: age, gender, activity level and existing debilitation or disease). Because innumerable factors may interact to determine specific biological effects of exposure to electromagnetic fields, any protection guide should consider both intended and unintended operational environments and provide guidance for installation and use of the equipment such that proper separation distances can be maintained. (ANSI C95.1).

APPENDIX A - RF Exposure Limits

United States Compliance Requirements (1.1310):

RF Exposure Evaluation Limits Occupational / Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
0.3-3.0	614	1.63	*(100)	< 6
3.0-30	1842 / f _{MHz}	4.89 / f _{MHz}	*(900 / f _{MHz} ²)	< 6
30-300	61.4	0.163	1	< 6
300-1500	--	--	f _{MHz} / 300	< 6
1500-100,000	--	--	5.0	< 6

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
0.3-1.34	614	1.63	*(100)	< 30
1.34-30	824 / f _{MHz}	2.19 / f _{MHz}	*(180 / f _{MHz} ²)	< 30
30-300	27.5	0.073	0.2	< 30
300-1500	--	--	f _{MHz} / 1500	< 30
1500-100,000	--	--	1.0	< 30

* Plane wave equivalent power density

Limit is calculated based on the mid-band frequency used in the operating frequency range.

Exemption Limits for Stand-Alone SAR Evaluation:

In accordance with 47 CFR 1.1307(b)(3)(i)

Exemption Threshold for Maximum Time Averaged Output Power or EIRP (mW)		
Frequency (MHz)	$0.5 \leq d \leq 20cm$	$20cm < d \leq 40cm$
0.1 – 100,000	≤ 1 (including $d < 0.5$)	
0.3 – 1.34	$1.64 * 192 * d^2 \mid d \geq \lambda/2\pi$	
1.34 – 30	$1.64 * 345 * \frac{d^2}{f_{MHz}^2} \mid d \geq \lambda/2\pi$	
30 – 300	$1.64 * 0.383 * d^2 \mid d \geq \lambda/2\pi$	
300 - 1500 -	$1.64 * 0.00128 * d^2 * f_{MHz} \mid d \geq \lambda/2\pi, or$ $1.64 * 2.04 * f_{MHz} * \left(\frac{d}{20}\right)^{-Log\left(\frac{60}{2040 * f_{MHz}^{1.5}}\right) - 4.5}$	$1.64 * 0.00128 * d^2 * f_{MHz} \mid d \geq \lambda/2\pi, or$ $1.64 * 2.04 * f_{MHz}$
1500 – 6000	$164 * 1.92 * d^2 \mid d \geq \lambda/2\pi, or$ $1.64 * 3060 * \left(\frac{d}{20}\right)^{-Log\left(\frac{60}{3060 * f_{MHz}^{0.5}}\right) - 1.5}$	$1.64 * 1.92 * d^2 \mid d \geq \lambda/2\pi, or$ $1.64 * 3060$
6000 – 100,000	$1.64 * 1.92 * d^2 \mid d \geq \lambda/2\pi$	

Equations have been modified from the published version to reflect consistent units of d in cm, P_{th} in mW (EIRP) and f in MHz.

Canadian Compliance Requirements (RSS-102):

***RF Exposure Evaluation Limits
Occupational / Controlled Exposure:***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)
0.003-10	170	180	--	Instantaneous
0.1-10	--	1.6 / f _{MHz}	--	6
1.29-10	193 / f _{MHz} ^{0.5}	--	--	6
10-20	61.4	0.163	10	6
20-48	129.8 / f ^{0.5}	0.3444 / f _{MHz} ^{0.25}	44.72 / f _{MHz} ^{0.5}	6
48-100	49.33	0.1309	6.455	6
100-6000	15.60 f _{MHz} ^{0.25}	0.04138 f _{MHz} ^{0.25}	0.6455 f _{MHz} ^{0.5}	6
6000-15000	137	0.364	50	6
15000-150,000	137	0.364	50	616000 / f _{MHz} ^{1.2}
150,000-300,000	0.354 f _{MHz} ^{0.5}	9.40x10 ⁻⁴ f _{MHz} ^{0.5}	3.33x10 ⁻⁴ f _{MHz}	616000 / f _{MHz} ^{1.2}

***RF Exposure Evaluation Limits
General Population / Uncontrolled Exposure***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)
0.003-10	83	90	--	Instantaneous
0.1-10	--	0.73 / f	--	6
1.1-10	87 / f _{MHz} ^{0.5}	--	--	6
10-20	27.46	0.0728	2	6
20-48	58.07 / f _{MHz} ^{0.25}	0.1540 / f _{MHz} ^{0.25}	8.944 / f _{MHz} ^{0.5}	6
48-300	22.06	0.05852	1.291	6
300-6000	3.142 f _{MHz} ^{0.3417}	0.008335 f _{MHz} ^{0.3417}	0.02619 f _{MHz} ^{0.6834}	6
6000-15000	61.4	0.163	10	6
15000-150,000	61.4	0.163	10	616000 / f _{MHz} ^{1.2}
150,000-300,000	0.158 f _{MHz} ^{0.5}	4.21x10 ⁻⁴ f _{MHz} ^{0.5}	6.67x10 ⁻⁵ f _{MHz}	616000 / f _{MHz} ^{1.2}

Exemption Limits for Stand-Alone SAR Evaluation:

Exemption Limits (mW) at Separation Distance (mm)										
Freq(MHz)	≤5	10	15	20	25	30	35	40	45	≥50
≤300	71	101	132	162	193	223	254	284	315	345
450	52	70	88	106	123	141	159	177	195	213
835	17	30	42	55	67	80	92	105	117	130
1900	7	10	18	34	60	99	153	225	316	431
2450	4	7	15	30	52	83	123	173	235	309
3500	2	6	16	32	55	86	124	170	225	290
5800	1	6	15	27	41	56	71	85	97	106

Exemption Limits for Stand-Alone Mobile Routine Evaluation:

Frequency (MHz)	RF Exposure Exemption Limit (mW)
<20	1000
20-48	$4490 / f_{\text{MHz}}^{0.5}$
48-300	600
300-6000	$13.1 f_{\text{MHz}}^{0.6834}$
≥6000	5000

Australian Radiation Protection and Nuclear Safety Agency Requirements (ARPANSA):

***RF Exposure Evaluation Limits
Occupational / Controlled Exposure:***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1 – 6.943	170	4.9 / f _{MHz}	--	30
6.943-30	660 / f _{MHz}	4.9 / f _{MHz}	--	30
30-400	61	0.16	10	30
400-2000	3 * f _{MHz} ^{0.5}	0.008 * f _{MHz} ^{0.5}	f _{MHz} / 40	30
2000-300,000	--	--	50	30

***RF Exposure Evaluation Limits
General Population / Uncontrolled Exposure***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1 - 6.27	83	2.2 / f _{MHz}	--	30
6.27 – 30	300 / f _{MHz} ^{0.7}	2.2 / f _{MHz}	--	30
30-400	27.7	0.073	2	30
400-2000	1.375 f _{MHz} ^{0.5}	0.0037 * f _{MHz} ^{0.5}	f _{MHz} / 200	30
2000-300,000	--	--	10	30

Exemption Limits for Stand-Alone Evaluation:

In accordance with ARPANSA RPS S-1 Advisory Note.

Exemption Threshold for Maximum Time Averaged Output Power (mW)		
Frequency (MHz)	General Public	Occupational
0.1 – 6000	20	100
6000 – 30,000	8	40
30,000 – 300,000	4	20

New Zealand Requirements (NZS 2772.1):

**RF Exposure Evaluation Limits
Occupational / Controlled Exposure:**

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1 – 1	610	1.6 / f _{MHz}	--	6
1-10	610 / f _{MHz}	1.6 / f _{MHz}	--	6
10-400	61	0.16	10	6
400-2000	3 * f _{MHz} ^{0.5}	0.008 * f _{MHz} ^{0.5}	f _{MHz} / 40	6
2000-300,000	137	0.36	50	6

**RF Exposure Evaluation Limits
General Population / Uncontrolled Exposure**

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1 – 0.15	87	5	--	6
0.15 – 1	87	0.73 / f _{MHz}	--	6
1 – 10	87 / f _{MHz} ^{0.5}	0.73 / f _{MHz}	--	6
10-400	28	0.073	2	6
400-2000	1.375 f _{MHz} ^{0.5}	0.0037 * f _{MHz} ^{0.5}	f _{MHz} / 200	6
2000-300,000	61	0.16	10	6

Exemption Limits for Stand-Alone Evaluation:

Mean Power < 20mW

Mean power with duty cycle ≤ 50% and d > 2.5cm: $\begin{cases} 7000 & | 0.1 < f_{MHz} < 450 \text{ MHz} \\ 630,000/f_{MHz} & | 450 < f_{MHz} < 2500 \text{ MHz} \end{cases} \text{ mW}$

European Union Compliance Requirements 1999/519/EC

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.003-0.150	87	5.0	--	6
0.150-1.0	87	$0.73 / f_{\text{MHz}}$	--	6
1.0-10	$87 / f_{\text{MHz}}^{0.5}$	$0.73 / f_{\text{MHz}}$	--	6
10-400	28	0.073	2	6
400-2000	$1.375 f_{\text{MHz}}^{0.5}$	$0.0037 * f_{\text{MHz}}^{0.5}$	$f_{\text{MHz}} / 200$	6
2000-300,000	61	0.16	10	6

*Power density limit applicable >100MHz

Exemption Limits¹ for Stand-Alone SAR Evaluation:

Head / Body: 20mW

Extremity: 40mW

¹ EN 62479 Annex A, General Public

General Reference Levels for Local Exposure (ICNIRP 1998):

***RF Exposure Evaluation Limits
Occupational / Controlled Exposure:***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.00082-0.065	610	24.4	--	6
0.065-1.0	610	1.6/f	--	6
1.0-10	610 / f _{MHz}	1.6/f	--	6
10-400	61	0.16	10	6
400-2000	3.0 * f _{MHz} ^{0.5}	0.008 * f _{MHz} ^{0.5}	f _{MHz} / 40	6
2000-300,000	137	0.36	50	6

***RF Exposure Evaluation Limits
General Population / Uncontrolled Exposure***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.003-0.150	87	5.0	--	6
0.150-1.0	87	0.73 / f _{MHz}	--	6
1.0-10	87 / f _{MHz} ^{0.5}	0.73 / f _{MHz}	--	6
10-400	28	0.073	2	6
400-2000	1.375 f _{MHz} ^{0.5}	0.0037 * f _{MHz} ^{0.5}	f _{MHz} / 200	6
2000-300,000	61	0.16	10	6

*Power density limit applicable >100MHz

General Reference Levels for Local Exposure (ICNIRP 2020):

***RF Exposure Evaluation Limits
Occupational / Controlled Exposure:***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1-30	1504 / f _{MHz} ^{0.7}	10.8/f _{MHz}	--	6
30-400	139	0.36	50	6
400-2000	10.58 * f _{MHz} ^{0.43}	0.0274 * f _{MHz} ^{0.43}	0.29 * f _{MHz} ^{0.86}	6
2000-6000	--	--	200	6
6000-300,000	--	--	275 / f _{GHz} ^{0.177}	6
300,000	--	--	100	6

***RF Exposure Evaluation Limits
General Population / Uncontrolled Exposure***

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.1-30	671 / f _{MHz} ^{0.7}	4.9 / f _{MHz}	--	6
30-400	62	0.163	10	6
400-2000	4.72 f _{MHz} ^{0.43}	0.0123 * f _{MHz} ^{0.43}	0.058 * f _{MHz} ^{0.86}	6
2000-6000	--	--	40	6
6000-300,000	--	--	55 / f _{GHz} ^{0.177}	6
300,000	--	--	20	6

Selected Excerpts:

Note 4: For frequencies of 100 kHz to 30 MHz, regardless of the far-field/near-field zone distinctions, compliance is demonstrated if neither peak spatial Electric Field or peak spatial Magnetic Field, over the projected whole-body space, exceeds the above reference level values.

Note 5: For frequencies of >30MHz to 6 GHz: within the far-field zone, compliance is demonstrated if one of peak spatial Incident Power Density, Electric Field or Magnetic Field, over the projected whole-body space, does not exceed the above reference level values (only one is required).

Appendix B - References

1. ACMA Radiocommunications (Electromagnetic Radio – Human Exposure) Standard, 2014.
2. AS/NZS 2772.2, Radiofrequency fields – Principles and method of measurement and computation – 3 kHz to 300 GHz, 2011.
3. Australian Radiation Protection and Nuclear Safety Agency, ARPANSA RPS S-1, Standard for Limiting Exposure to Radiofrequency Fields 100 kHz to 300 GHz, 2021.
4. New Zealand Standard, NZS 2772.1, Radiofrequency Fields Part 1: Maximum Exposure Levels 3 kHz to 300 GHz, 1999.
5. Federal Communications Commission Knowledge Database (KDB) Publication 447498, “What are the RF exposure requirements and procedures for mobile and portable devices?” As in effect on the issue date of this report.
6. Title 47 Code of Federal Regulations, Part 1.1307(b)(3), “Determination of exemption.” As in effect on the issue date of this report.
7. Title 47 Code of Federal Regulations, Part 1.1310, “Radiofrequency radiation exposure limits.” As in effect on the issue date of this report.
8. Title 47 Code of Federal Regulations, Part 2.1091, “Radiofrequency radiation exposure evaluation: mobile devices.” As in effect on the issue date of this report.
9. ANSI C95.1 (2005) IEEE Standard for Safety Level with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300 GHz, 2005.
10. Health Canada Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz, 2015.
11. Industry Canada GL-01 Guidelines for the Measurement of Radio Frequency Fields at Frequencies From 3 kHz to 300 GHz, Issue 3, March 2015.
12. Industry Canada RSS-102 Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands) Issue 5, March 2015.
13. EC Council Recommendation 1999/519/EC “On the limitation of exposure of the general public to electromagnetic fields (0Hz to 300GHz),” (1999).
14. European Committee for Electrotechnical Standardization. European Normative, EN 62311 Assessment of electronic and electrical equipment related to human exposure restrictions for electromagnetic fields (0 Hz to 300 GHz), 2008.
15. European Committee for Electrotechnical Standardization. European Normative, EN 62479 Assessment of the compliance of low power electronic and electrical equipment with the basic restrictions related to human exposure to electromagnetic fields (10 MHz to 300 GHz), 2010.
16. International Commission on Non-Ionizing Radiation Protection. Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz). Health Physics 74 (4): 494-522; 1998.
17. International Commission on Non-Ionizing Radiation Protection Statement on the "Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz). Health Physics 97(3):257-259, 2009.
18. International Commission on Non-Ionizing Radiation Protection. Guidelines for Limiting Exposure to Electromagnetic Fields (100kHz to 300 GHz). Health Physics 118-(5): 483-524; 2020.

Appendix C

The following model has been tested: **Glucose Sensor Transmitter, RF ID: 033686**

RF ID: 033686 represents the hardware of our disposable all-in-one sensor, and transmitter medical device for Continuous Glucose Monitoring (CGM). The Glucose Sensor Transmitter (GST) platform includes a variety of different brand names and model numbers supporting different use cases.

The manufacturer declares that the following models are identical electrically or any differences between them do not affect their RF and EMC characteristics, and therefore meet the level of testing equivalent to the tested model.

Glucose Sensor Transmitter (GST)	Brand name	Configuration
RF ID: 033686	Disposable Sensor 5	MMT-5100CLX
	Simplera™	MMT-5100J
	Simplera Sync™	MMT-5120

Note: The products identified in the table above have the same hardware but different software and firmware to function as components in different CGM systems. The GST models are used in a clinical (MMT-5100CLX), standalone (MMT-5100J), or integrated CGM insulin pump (MMT-5120) system.

All models above communicate with a compatible network device via Bluetooth Low Energy to provide glucose information for diabetes management. The software and firmware do not affect product radio or electromagnetic compatibility performance or compliance. Hardware documentation such as schematics, block diagram, printed circuit board and component layouts are identical between these models.

Additional configuration identifiers (e.g., A, B, 1, 2...) may be added to the base configuration number for inventory management/distribution purposes and pertain to different regions (US vs. OUS), packages (1-pack vs. 5-pack), and user guide language bundles.