



**FCC Part 1 Subpart I
FCC Part 2 Subpart J**

RF EXPOSURE REPORT

FOR

WIRELESS EARBUDS

MODEL NAME: 2191-20

FCC ID: P36-219120

REPORT NUMBER: R13761452-E15

ISSUE DATE: 2023-02-13

**Prepared for
MILWAUKEE ELECTRIC TOOL CORP
13135 W LISBON ROAD
BROOKEFIELD, WI 53005
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REVISION HISTORY

Rev.	Issue Date	Revisions	Revised By
1	2022-10-12	Original issue	Brian T. Kiewra
2	2023-02-13	Updated output power values and model number	Niklas Haydon

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1. ATTESTATION OF TEST RESULTS

COMPANY NAME: Milwaukee Electric Tool Corp
13135 W Lisbon Road
Brookefield, WI 53005
United States

EUT DESCRIPTION: Wireless Earbuds

MODEL: 2191-20

APPLICABLE STANDARDS	
STANDARD	TEST RESULTS
FCC PART 1 SUBPART I & PART 2 SUBPART J	Complies

UL LLC tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

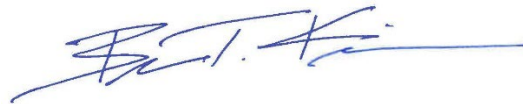
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Approved & Released
For UL LLC By:



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Project Engineer
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2. TEST METHODOLOGY

All calculations were made in accordance with FCC Parts 1.1310, 2.1091, 2.1093, KDB 447498 D01 v06, KDB 447498 D03 V01, IEEE Std C95.1-2005, and IEEE Std C95.3-2002.

This report contains data provided by the customer which can impact the validity of results. UL LLC is only responsible for the validity of results after the integration of the data provided by the customer

3. REFERENCES

Output power, Duty cycle and Antenna gain data is excerpted from client declarations.

4. FACILITIES AND ACCREDITATION

UL LLC is accredited by A2LA, certification # 0751.06, for all testing performed within the scope of this report. Testing was performed at the locations noted below.

	Address	ISED CABID	ISED Company Number	FCC Registration
<input type="checkbox"/>	Building: 12 Laboratory Dr RTP, NC 27709, U.S.A	US0067	2180C	825374
<input type="checkbox"/>	Building: 2800 Perimeter Park Dr. Suite B Morrisville, NC 27560, U.S.A		27265	

5. DEVICE UNDER TEST

The EUT is a pair of wireless earbuds with a Bluetooth and BLE transceiver. As the user to antenna separation distance is unspecified the distance was assumed to be 5mm.

6. STANDALONE SAR TEST EXCLUSION CONSIDERATIONS

6.1. FCC

SAR test exclusion in accordance with KDB 447498.

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [f(\text{GHz})] \leq 3.0$, for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- $f_{(\text{GHz})}$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

This test exclusion is applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances > 50 mm are determined by:

1. $\{[\text{Power allowed at numeric threshold for 50 mm}]\} + \{[(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$ mW, for 100 MHz to 1500 MHz
 - $f_{(\text{MHz})}$ is the RF channel transmit frequency in MHz
2. $\{[\text{Power allowed at numeric threshold for 50 mm}]\} + \{[(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$ mW, for > 1500 MHz and ≤ 6 GHz

SAR Exclusion Calculation Table for Portable Devices (separation distance < 50 mm)

Tx	Frequency (MHz)	Avg Output power		Separation distances (mm)	Calculated Threshold
		dBm	mW		
BT	2402	8.00	6.31	5	2.0
BLE	2402	3.00	2.00	5	0.6

Conclusion:

The computed values are < 3 ; therefore, the device qualifies for Standalone SAR test exclusion.

END OF TEST REPORT