

# **HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT**

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<span id="page-0-0"></span>**The product was received on Apr. 17, 2024 and testing was started from May 22, 2024 and completed on May 22, 2024. We, SPORTON INTERNATIONAL INC., would like to declare that the tested sample provide by manufacturer and the test data has been evaluated in accordance with the test procedures given in ANSI 63.19-2019 / 47 CFR Part 20.19 and has been pass the FCC requirement.**

**The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC. Laboratory, the test report shall not be reproduced except in full.**

Cona Change

**Approved by: Cona Huang / Deputy Manager**



*Sporton International Inc. Wensan Laboratory No.58, Aly. 75, Ln. 564, Wenhua 3rd, Rd., Guishan Dist., Taoyuan City 333010, Taiwan*



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# <span id="page-2-0"></span>**History of this test report**

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# <span id="page-3-0"></span>*1. General Information*



# **Reviewed by: Jason Wang Report Producer: Daisy Peng**



# <span id="page-4-0"></span>*2. Testing Location*

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 3786) and the FCC designation No. TW3786 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.



# <span id="page-4-1"></span>*3. Applied Standards*

- ‧ FCC CFR47 Part 20.19
- ‧ ANSI C63.19-2019
- ‧ FCC KDB 285076 D01 HAC Guidance v06r04
- ‧ FCC KDB 285076 D03 HAC FAQ v01r06



# <span id="page-5-0"></span>*4. Air Interfaces*



Remark:

1. The air interface max power plus MIF is complies with ANSI63.19-2019 Table 4.1 RFAIPL 2. The WiFi 6E above 6GHz portion is currently not within the scope of FCC Part 20.19, an

2. The WiFi 6E above 6GHz portion is currently not within the scope of FCC Part 20.19, and therefore not evaluated.

3. Because features of Google Meet allow the option of voice-only communications, Meet has been tested for HAC/T-Coil compatibility to ensure the best user experience.

4. The device have similar frequency in some LTE and NR bands: LTE 12/17, 25/2, 26/5, 66/4, 38/41 and NR 26/5, 38/41, 77/78 since the supported frequency spans for the smaller LTE and NR bands are completely cover by the larger LTE and NR bands, therefore, only larger LTE and NR bands were required to be tested for hearing-aid compliance.

5. The product only 2G/3G/4G/5G support Time average SAR feature, therefore2G/3G/4G/5G HAC were tested at highest instantons Pmax power level, however, due the WiFi operation doesn't support Time average SAR feature, therefore, WiFi operation were assessment at head power level to meet **HAC** compliance



# <span id="page-6-0"></span>*5. WD Emission Requirements*

The WD's conducted power must be at or below either the stated RFAIPL (Table 4.1 ) or the stated peak power level (Table 4.2), or the average near-field emissions over the measurement area must be at or below the stated RFAIL (Table 4.3), or the stated peak field strength (Table 4.4). The WD may demonstrate compliance by meeting any of these four requirements, but it must do so in each of its operating bands at its established worst-case normal speech-mode operating condition.









# <span id="page-7-0"></span>*6. System Description and Operation*

# **<System Components>**



#### **Remark:**

A typical al DASY system for HAC measurements consists of

- 6-axis robotic arm (Staubli TX2-60L/ TX2-90XL) for positioning the probe
- Mounting Platform for keeping the phantoms at a field location relative to the robot
- Measurement Server for handling all time-critical tasks, such as measurement data acquisition and supervision of safety features
- EOC (Electrical to Optical Converter) for converting the optical signal from the Data Acquisition Electronics (DAE) to electrical before being transmitted to the measurement server
- LB (Light Beam unit) for probe alignment (measurement of the exact probe length and eccentricity)
- Test Arch for Device Under Test (DUT) testing
- DAE that reads the probe voltages and transmits them to the DASY PC. It is also used to detect probe touch and collision signals
- Device Holder for positioning the DUT beneath the phantom
- ANT (wideband Antenna) for broadcasting the downlink signals emitted by base station simulators (BSS) to the WD
- Operator PC for running the DASY software to define/execute the measurements.

The following components are needed for RFail measurements only:

- Modulation Interference Factor (MIF)
- Isotropic E-field, free-space probe (e.g., EF3DVx)
- Radiofrequency (RF) emission calibration dipoles for system check / validation purposes.



#### **<EF3DV3 E-Field Probe Specification>**



### **Voltage to E-field Conversion**

The measured voltage is first linearized to a quantity proportional to the square of the E-field using the (a, b, c, d) set of parameters specific to the communication system and sensor:

$$
V_{compi}=U_i+U_i^2\cdot\frac{10\frac{d}{10}}{dcp_i}
$$

where  $V_{\text{compi}} =$  compensated signal of channel i ( $\mu V$ ) ( $i = x, y, z$ )

 $U_i$  = input signal of channel i ( $\mu$ V) ( $i = x, y, z$ )

d = PMR factor d (dB) (Probe parameter)

 $dcp_i$  = diode compression point of channel i ( $\mu$ V) (Probe parameter, i = x, y, z)

$$
V_{compi}^{dB_{\sqrt{\mu V}}} = 10 + log_{10} (V_{compi})
$$

$$
corr_i = a_i \cdot e - \left(\frac{V_{compi}{}^{dB}\!\!\!\sqrt{_{\mu} v}}{C_i}\right)^2
$$

where coor<sub>i</sub> = correction factor of channel i (dB)  $(i = x, y, z)$ V<sub>compi dB</sub> $\sqrt{\mu}$  = compensated voltage of channel i (dB $\sqrt{\mu}$ V) (i = x, y, z)  $a_i$  = PMR factor a of channel i (dB) (Probe parameter,  $i = x,y,z$ )  $b_i$  = PMR factor b of channel i (dB $\sqrt{\mu}$ V) (Probe parameter, i = x,y,z)  $c_i$  = PMR factor c of channel i (Probe parameter,  $i = x, y, z$ )

The voltage V<sub>idB</sub> $\sqrt{\mu}$  is the linearized voltage in dB $\sqrt{\mu}$ V:

$$
V_{i\,dB_{\!\sqrt{\mu V}}}=V_{compi\,dB_{\!\sqrt{\mu V}}}-corr_{i}
$$

where  $V_i$  dB $\sqrt{\mu}V$  = linearized voltage of channel i (dB $\sqrt{\mu}V$ ) (i = x,y,z) V<sub>compi dB</sub> $\sqrt{\mu}$  = compensated voltage of channel i (dB $\sqrt{\mu}$ V) (i = x,y,z) Corr<sub>i</sub> = correction factor of channel i (dB)  $(i = x,y,z)$ 

Finally, the linearized voltage is converted in  $\mu V$ :

 $V_i = 10 \frac{V_{i \, dB_{\sqrt{\mu V}}}}{10}$ **10** 

where  $V_i$  = linearized voltage of channel i ( $\mu V$ ) ( $i = x, y, z$ ) V<sub>i dB√</sub> $_{\mu\nu}$  = linearized voltage of channel i (dB<sub>√</sub> $_{\mu}$ V (i = x,y,z)

The E-field data for each channel are calculated using the linearized voltage:

$$
\text{E-field Probes}: \, \mathbf{E_i} = \sqrt{\frac{v_i}{\text{Norm}_i \cdot \text{ConvF}}}
$$

where  $V_i$  = compensated signal of channel i, (i = x, y, z) Norm<sub>i</sub> = sensor sensitivity  $(\mu V/(V/m)^2)$  of channel i (i = x, y, z) ConvF = sensitivity enhancement in solution  $E_i$  = electric field strength of channel i in  $V/m$ 

The RMS value of the field components gives the total field strength (Hermitian magnitude):

$$
E_{tot} = \sqrt{E_x^2 + E_y^2 + E_z^2}
$$

#### **Averaged E-field Calculation**

The averaged E-field is defined by

$$
E_{avg} = \frac{1}{n} \cdot \sum_{i=1}^{n} E_i
$$

where  $n =$  = the number of measurement grid point  $E_i$  = the E-field measured at point i

### **RFail Calculation**

The RFail is finally computed with

$$
RFail[dB(V/m)] = 20 \cdot log_{10}(E_{avg}) + MIF
$$

where  $RFail = the Radio Frequency Audio Interface Level in dB(V/m)$  $E_{avg}$  = the averaged E-field in (V/m) calculated MIF = the Modulation Interference Factor in dB.





# <span id="page-10-0"></span>*7. RF Emissions Test Procedure*









#### **The references and reference plane that shall be used in the WD emissions measurement**



#### **Test procedure: Indirect measurement—preferred**

- a. The measurement procedure using a probe and instrumentation chain with a response of <10 kHz (see ANSI63.19-2019 section4.5.1) is identical to the direct measurement method of ANSI63.19-2019 section4.5.3.2.2: however, because of the bandwidth limitations, it cannot include the direct use of the spectral and temporal weighting functions. The output of such measurement systems must be readings of steady state rms field strength in dB(V/m).
- b. The RF audio interference level in dB(V/m) is obtained by adding the Modulation Interference Factor (in decibels) to the average steady state rms field strength reading over the measurement area, in dB(V/m), from Step c). Use this result to determine the WD's compliance per ANSI 63.19-2019 section4.7.
- c. Scan the entire 50 mm by 50 mm measurement area in equally spaced step sizes and record the reading at each measurement point. The step size shall meet the specification for step size in ANSI 63.19:2019 section 4.5.3.
- d. Calculate the average of the measurements taken in Step c
- e. Convert the average value found in Step d) to RF audio interference level, in volts per meter, by taking the square root of the reading and then dividing it by the measurement system transfer function, as established in ANSI 63.19:2019 section4.5.3.2.1 pre-test procedure. Convert the result to dB(V/m) by taking the base-10 logarithm and multiplying it by 20. Expressed as a formula

RF audio interference level in db(V/M) 20  $*$  log( $R_{ave}^{1/2}$  / TF)

where

- $R_{ave}$  is the average reading<br>f. Compare this RF audio
- f. Compare this RF audio interference level to the limits in ANSI 63.19:2019 section4.7 and record the result
- g. Per ANSI63.19-2019 section4.6, WDs capable of operating multiple transmitters shall be subject to emissions requirements for all such transmitters expected to be operated when the WD is in voice mode operation positioned at a user's ear. Each qualified transmitter is tested individually using the method of Clause 4. Other WD transmitters shall be temporarily disabled or reduced in power level such that their average antenna input power is at least 6 dB lower than the average antenna input power of the transmitter under test. The transmitter under test is set to the fixed and repeatable combination of power and modulation characteristic that is representative of the worst case (highest interference potential) likely to be encountered while the WD is experiencing normal voice mode operation. The limiting measurement for device qualification is the highest RF audio interference potential measured for any of the WD transmitters. If the highest interference measurement is from a transmitter that is not required for normal voice mode operation, a secondary rating may be given that applies when that transmitter is disabled.



# <span id="page-12-0"></span>*8. Test Equipment List*



**Note**<br>1.<br>2. 1. NCR: "No-Calibration Required"

2. The dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval. The justification data in appendix C can be found which the return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration for each dipole.



# <span id="page-13-0"></span>*9. System Validation*

Obtaining accurate measurements and relevant quantities in Module HAC depends on the proper functioning of many components and the correct parameter settings. Faulty results due to drift, failures, or incorrect parameters might not be recognized, as the differences might not be obvious in the measurements.

SPEAG DASY incorporates a system check, also called system verification procedure, to test for the proper functioning of the system based on the tests described in ANSI C63.19-2019: the RF interference potential test setup is verified with RF Emission Calibration Dipoles.

#### **<Test Setup>**

- 1. Set the RF signal generator for either CW. Set its output power so the peak power applied to the antenna is equal to that recorded for the real or emulated signal using the WD modulation format
- 2. Average input power P = 100 mW (20 dBm) after adjustment for return loss. An input power that generates field levels similar to those from the WD or other suitable level may also be used
- 3. The test fixture should meet the two-wavelength separation criterion
- 4. The probe-to-dipole separation, which is measured from closest surface of the dipole to the center point of the probe sensor element, should be 15 mm



**Figure of Setup Diagram**

#### **<Validation Procedure>**

Place a dipole antenna meeting the requirements given in ANSI 63.19: 2019 D.11 in the position normally occupied by the WD. The dipole antenna serves as a known source for an electrical and magnetic output. Position the E-field probe so that:

- a. The probe and its cable are parallel to the coaxial feed of the dipole antenna
- b. The probe cable and the coaxial feed of the dipole antenna approach the measurement area from opposite directions; and
- c. The center point of the probe element(s) is 15 mm from the closest surface of the dipole elements

Scan the length of the dipole with the E-field probe and record the two maximum values found near the dipole ends. Average the two readings and compare the reading to expected value in the calibration certificate or expected value in this standard.





# <span id="page-14-0"></span>*10. Modulation Interference Factor*

For any specific fixed and repeatable modulated signal, a Modulation Interference Factor (MIF, expressed in decibels) may be developed that relates its interference potential to its steady state rms signal level or average power level. This factor is a function only of the audio frequency amplitude modulation characteristics of the signal and is the same for field strength or conducted power measurements. It is important to emphasize that the MIF is valid only for a specific repeatable audio frequency amplitude modulation characteristic. Any change in modulation characteristic requires determination and application of a new MIF.

MIF may be determined using a radiated RF field, a conducted RF signal, or, in a preliminary stage, a mathematical analysis of a modeled RF signal.

- a. Verify the slope accuracy and dynamic range capability over the desired operating frequency band of a fast probe or sensor, square-law detector, as specified in ANSI 63.19: 2019 D.3, and weighting system as specified in ANSI 63.19: 2019 D.4 and ANSI 63.19: 2019 D.5. For the probe and instrumentation included in the measurement of MIF, additional calibration and application of calibration factors are not required.
- b. Using RF illumination, or conducted coupling, apply the specific modulated signal in question to the measurement system at a level within its confirmed operating dynamic range
- c. Measure the steady-state rms level at the output of the fast probe or sensor
- d. Measure the steady-state average level at the weighting output
- e. Without changing the square-law detector or weighting system, and using RF illumination, or conducted coupling, substitute for the specific modulated signal a 1 kHz, 80% amplitude modulated carrier at the same frequency and adjust its strength until the level at the weighting output equals the Step d) measurement
- f. Without changing the carrier level from Step e), remove the 1 kHz modulation and again measure the steady-state rms level indicated at the output of the fast probe or sensor.
- g. The MIF for the specific modulation characteristic is given by the ratio of the Step f) measurement to the Step c) measurement, expressed in decibels (20\*log(step6/step3)

In practice, Step e) and Step f) need not be repeated for each MIF determination if the relationship between the two measurements has been pre-established for the measurement system over the operating frequency and dynamic ranges. In such cases, only the modulation characteristic being tested needs to be available during WD testing Since indirect measurement procedure was using for RF audio interference power level evaluation, the MIF values applied in this test report were provided by the HAC equipment provider of SPEAG, and the worst values for all air interface are listed below to be determine the Wireless device RF audio interference power level.





# <span id="page-15-0"></span>*11. Evaluation of WD RF interference potential*

#### **General Note:**

- 1. In this report, max conducted power from each air interface was first used to evaluate whether it complies with ANSI63.19-2019 Table 4.1 RFAIPL, compliance with table 4.1 means compliance with WD emission requirements. the RFAIPL evaluation refer to section 11.1 for detail.
- 2. If there some air interface were not meet ANSI63.19-2019 table 4.1 requirement, these air interfaces were further evaluation ANSI63.19-2019 Table 4.3 RFAIL requirement. And the RFAIL evaluation result refer to section11.2

# <span id="page-15-1"></span>*11.1Evaluation RFAIPL*

#### **<WWAN Max Tune-up Limit>**





#### **<Evaluation RF audio interference power level>**

#### **General Note:**

- 1. Use maximum power plus worst case MIF to determine whether it complies with RFAIPL
- 2. If maximum power plus worst case MIF does not complies with RFAIPL, then further evaluation RFAIL include in section 11.2.
- 3. According to ANSI C63.19 2019, if maximum power plus worst case MIF is complies with RFAIPL, means compliance with WD emission requirements.

















#### **< WLAN Max Tune-up Limit>**





#### **<Evaluation RF audio interference power level>**

#### **General Note:**

- 1. Use maximum power plus worst case MIF to determine whether it complies with  $RF_{AIPL}$
- 2. According to ANSI C63.19 2019, if maximum power plus worst case MIF is complies with  $\mathsf{RF}_{\mathsf{AIPL}}$ , means compliance with WD emission requirements.







## <span id="page-19-0"></span>*11.2Evaluation RFAIL*

#### **General Note:**

- 1. The HAC measurement system applies MIF value onto the measured RMS E-field, which is indirect method in ANSI C63.19-2019 version, and reports the RF audio interference level.
- 2. Phone Condition: Mute on; Backlight off; Max Volume
- 3. Since the NR n77 power class 3 maximum power plus MIF is complies with ANSI63.19-2019 Table 4.1 RFAIPL, therefore, only power class2 evaluated RFAIL.
- 4. Since the FR1 n77 that the maximum channel bandwidth does not support three non-overlapping channels in the frequency band, the middle channel of the group of overlapping channels were selected for testing.



Test Engineer: Charles Shen and Sam Lin

Conformity:

The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.

Disclaimer:

The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.



# <span id="page-20-0"></span>*12. Uncertainty Assessment*

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances. Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is showed below Table

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.



**Uncertainty Budget of HAC free field assessment**



# <span id="page-21-0"></span>*13. References*

- [1] ANSI C63.19:2019, "American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids", Aug. 2019.
- [2] FCC KDB 285076 D01v06r04, "Equipment Authorization Guidance for Hearing Aid Compatibility", Sep. 2023.
- [3] FCC KDB 285076 D03v01r06, "Hearing aid compatibility frequently asked questions", Jul. 2022
- [4] SPEAG DASY System Handbook