

Test report No:  
NIE: 72449RAN.003

## Assessment report

### RF EXPOSURE REPORT ACCORDING TO FCC 47 CFR Part 2.1091; FCC 47 CFR Part 1.1307 FCC 47 CFR Part 1.1310

|   |  |
|---|--|
| (*) Identification of item under evaluation | XS4 Original+ Electronic Lock Series including all mechanical variants   |
| (*) Trademark                               | SALTO  |
| (*) Model and /or type reference            | W61M / Type reference: E2131   |
| (*) Other identification of the product     | HW version: 1.0<br>SW Version: 0174 (Control FW) + 0186 (FUS FW) + 0187 (BLE FW) + 0202 (Motor FW)<br>FCC ID: UKCW61M<br>IC ID: 10088A-W61M  |
| (*) Features                                | Bluetooth LE   |
| (*) Manufacturer                            | SALTO SYSTEMS, S.L.<br>Arkotz 9, Polígono Lanbarren 20180, Oiartzun (Gipuzkoa) - Spain   |
| Test method requested, standard             | FCC 47 CFR Part 2.1091 Radiofrequency radiation exposure evaluation: mobile devices.<br>FCC 47 CFR Part 1.1307: Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared.<br>FCC 47 CFR Part 1.1310: Radiofrequency radiation exposure limits. |
| Summary                                     | IN COMPLIANCE  |
| Approved by (name / position & signature)   | Miguel Lacave<br>Antennas Lab Manager  |
| Date of issue                               | 2023-03-07   |
| Report template No                          | FAN36_02<br>(*) "Data provided by the client"  |

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## Data provided by the client

The following data has been provided by the client:

1. Information relating to the description of the sample ("Identification of the item under evaluation", "Trademark", "Model and/or type reference", "Other identification of the product", "Features", "Manufacturer" and "General description of the device").
2. Maximum antenna gain and use distance information.

DEKRA Testing and Certification, S.A.U. declines any responsibility with respect to the information provided by the client and that may affect the validity of results.

## Identification of the client

Company name: SALTO SYSTEMS, S.L.

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## Document history

| Report number | Date       | Description   |
|---------------|------------|---------------|
| 72449RAN.003  | 2023-03-07 | First release |

## Appendix A: FCC RF Exposure assessment result

## General description of the device under evaluation

The device under evaluation consists of an electronic lock series with RFID Mifare (ISO 14443A & ISO 15693 standard based) and Bluetooth LE technology.

According to the manufacturer, during its normal use, the separation distance between the radiating structures of the device and nearby users will be greater than 20 cm. In order to perform the assessment a conservative evaluation distance of 20 cm has been used.

The equipment specifications for each supported technology are shown in Table 1. Values corresponding to BTLE output power and antenna gain have been measured and stated into DEKRA Testing and Certification, S.A.U. test report num. 72449RRF.008.

Values corresponding to NFC output power have been measured and stated into DEKRA Testing and Certification, S.A.U. test report num. 72449RRF.009. The power levels expressed as dBµV/m have been extrapolated to the minimum use distance following calculation stated in Appendix B, section RF Exposure Evaluation in this document:

| Technology / Mode | Operating Band | Frequency under evaluation (MHz) | Maximum Conducted Output Power (Incl. Tune-Up) (dBm) | Antenna peak gain (dBi) | Measured E-field at 3 m (dBµV/m) | Maximum E.R.P. (dBm) | Maximum E.R.P. (mW) | Maximum E.I.R.P. (dBm) | Maximum E.I.R.P. (mW) |
|-------------------|----------------|----------------------------------|--|-------------------------|----------------------------------|----------------------|---------------------|------------------------|-----------------------|
| BTLE              | 2.4 GHz        | 2400 - 2483.5                    | 3.67   | 0.50                    | -                                | 2.02                 | 1.59                | 4.17                   | 2.61                  |
| NFC               | 13.56          | 13.56                            | -  | -                       | 49.37                            | -                    | -                   | -                      | -                     |

**Table 1:** Equipment specifications

## Evaluation Results

### RF Exposure Exemption evaluation:

| Technology / Mode | Operating Band | Frequency under evaluation (MHz) | Distance (cm) | Maximum E.R.P. (mW) | §1.1307(b)(3).i.(C) Exposure Limit (mW) | Verdict for exemption § 1.1307(b)(3).i |
|-------------------|----------------|----------------------------------|---------------|---------------------|---|--|
| BTLE              | 2.4 GHz        | 2400 - 2483.5                    | 20.00         | 1.59                | 768.00                                  | <b>Pass</b>                            |
| NFC               | 13.56          | 13.56                            | 20.00         | N/A                 | N/A                                     | <b>MPE required</b>                    |

**Table 2:** FCC Exemption Evaluation Results

The device fails to comply with applicable §1.1307(b)(3).i. exemption limits, so Maximum Permissible Exposure (MPE) evaluation is necessary to demonstrate compliance.

**RF Exposure MPE evaluation:**

| Technology / Mode | Operating Band | Frequency under evaluation (MHz) | Distance (cm) | Power density (mW/cm <sup>2</sup> ) | FCC General Population Limit (mW/cm <sup>2</sup> ) | Verdict     |
|-------------------|----------------|----------------------------------|---------------|-------------------------------------|--|-------------|
| BTLE              | 2.4 GHz        | 2400 - 2483.5                    | 20.00         | 0.001                               | 1.00   | <b>Pass</b> |
| NFC               | 13.56          | 13.56                            | 20.00         | 0.00000116                          | 0.98   | <b>Pass</b> |

**Table 3:** FCC Evaluation Results

The computed value(s) are below the limit(s), so these modes meet the requirements stated in FCC 47 CFR Part 1.1310.

**Simultaneous transmission assessment:**

| Simultaneous technologies and modes | Result ( $\sum$ of Pout/Pmax ratios) | Verdict ( $\sum \leq 1$ ) |
|-------------------------------------|--------------------------------------|---------------------------|
| BTLE 2.4 GHz + NFC 13.56            | 0.001                                | <b>Pass</b>               |

**Table 4:** Simultaneous Transmission assessment

## Appendix B: FCC RF Exposure information

## RF Exposure determination of exemption

According to FCC 47 CFR §1.1307 (b)(3) Determination of exemption:

(i) For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2), a single RF source is exempt if:

(A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

(B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive).  $P_{th}$  is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

Where

$$x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right) \text{ and } f \text{ is in GHz;}$$

and

$$ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

$d$  = the separation distance (cm);

(C) Or using Table 1 and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, R must be at least  $\lambda/2\pi$ , where  $\lambda$  is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of  $\lambda/4$  or if the antenna gain is less than that of a half-wave dipole (1.64 linear value).

TABLE 1 TO §1.1307(b)(3)(i)(C)—SINGLE RF SOURCES SUBJECT TO ROUTINE ENVIRONMENTAL EVALUATION

| RF Source frequency (MHz) | Threshold ERP (watts) |
|---------------------------|-----------------------|
| 0.3-1.34                  | $1,920 R^2$ .         |
| 1.34-30                   | $3,450 R^2/f^2$ .     |
| 30-300                    | $3.83 R^2$ .          |
| 300-1,500                 | $0.0128 R^2 f$ .      |
| 1,500-100,000             | $19.2 R^2$ .          |



(ii) For multiple RF sources: Multiple RF sources are exempt if:

(A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those is paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(i)(A).

(B) in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure\ Limit_k} \leq 1$$

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph (b)(3)(i)(B) of this section for P<sub>th</sub>, including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph (b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

P<sub>i</sub> = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

P<sub>th,i</sub> = the exemption threshold power (P<sub>th</sub>) according to paragraph (b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

ERP<sub>j</sub> = the ERP of fixed, mobile, or portable RF source j.

ERP<sub>th,j</sub> = exemption threshold ERP for fixed, mobile, or portable RF source j, at a distance of at least λ/2π according to the applicable formula of paragraph (b)(3)(i)(C) of this section.

Evaluated<sub>k</sub> = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

Exposure Limit<sub>k</sub> = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k, as applicable from §1.1310 of this chapter.

## RF Exposure evaluation

Limits for Maximum Permissible Exposure (MPE) for RF sources are defined in FCC 47 CFR “§1.1310 Radiation Exposure limits, paragraph (e)”:

TABLE 1 TO §1.1310(E)(1)—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

| Frequency range (MHz)   | Electric field strength (V/m) | Magnetic field strength (A/m) | Power density (mW/cm <sup>2</sup> ) | Averaging time (minutes) |
|---|-------------------------------|-------------------------------|-------------------------------------|--------------------------|
| <b>(i) Limits for Occupational/Controlled Exposure</b>          |                               |                               |                                     |                          |
| 0.3-3.0   | 614                           | 1.63                          | *(100)                              | ≤6                       |
| 3.0-30  | 1842/f                        | 4.89/f                        | *(900/f <sup>2</sup> )              | <6                       |
| 30-300  | 61.4                          | 0.163                         | 1.0                                 | <6                       |
| 300-1,500   |                               |                               | f/300                               | <6                       |
| 1,500-100,000   |                               |                               | 5                                   | <6                       |
| <b>(ii) Limits for General Population/Uncontrolled Exposure</b> |                               |                               |                                     |                          |
| 0.3-1.34  | 614                           | 1.63                          | *(100)                              | <30                      |
| 1.34-30   | 824/f                         | 2.19/f                        | *(180/f <sup>2</sup> )              | <30                      |
| 30-300  | 27.5                          | 0.073                         | 0.2                                 | <30                      |
| 300-1,500   |                               |                               | f/1500                              | <30                      |
| 1,500-100,000   |                               |                               | 1.0                                 | <30                      |

f = frequency in MHz. \* = Plane-wave equivalent power density.

Each supported transmission technology will be evaluated to determine if it is in compliance with limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields.

In order to perform the assessment, the following equations have been used for the calculations; these equations are accurate in the far-field of an antenna and will over-predict power density in the near field, where they could be used for making a "worst-case" or conservative prediction:

$$\text{Power density: } S[mW/cm^2] = \frac{P_{E.I.R.P.}[mW]}{4\pi R[cm]^2}$$

Where:

$S$  = power density

$P_{E.I.R.P.}$  = Equivalent isotropically radiated power

$R$  = distance to the center of radiation of the antenna (evaluation distance)

$$P_{E.I.R.P.} = P_T + G_T - L_C$$

Where:

$P_T$  = transmitter time-averaged output power (including Duty Cycle and tune-up tolerance, if applicable)

$G_T$  = gain of the transmitting antenna

$L_C$  = signal attenuation in the connecting cable between the transmitter and the antenna if applicable

### NFC output power calculation

Output power values corresponding to NFC technology shown in Table 1 of “General description of the device under evaluation” section are calculated from maximum measured field strength values stated into DEKRA Testing and Certification test report num. 72449RRF.009 (see table below) following the calculation described below:

| Operation Mode | Frequency (MHz) | Maximum E-field strength (dBµA/m) measured at 3 m |
|----------------|-----------------|---|
| NFC            | 13.561          | 49.37   |

**Table 5:** Measurement Results

According to ANSI C63.10-2013, section 6.4.4.2:

If the Maximum E-field strength measured is at a distance greater than  $\lambda/2\pi$ , then extrapolation to the limit distance shall be calculated using the following equation:

$$FS_{\text{limit}} = FS_{\text{max}} - 20 \log \left( \frac{d_{\text{limit}}}{d_{\text{measure}}} \right)$$

If both the Maximum E-field strength measured and the limit distance are equal to or closer to the EUT than  $\lambda/2\pi$  the extrapolation to the limit distance shall be calculated using the following equation:

$$FS_{\text{limit}} = FS_{\text{max}} - 40 \log \left( \frac{d_{\text{limit}}}{d_{\text{measure}}} \right)$$

Where:

- $FS_{\text{limit}}$  is the calculation of field strength at the limit distance, expressed in dBµV/m
- $FS_{\text{max}}$  is the measured field strength, expressed in dBµV/m
- $d_{\text{measured}}$  is the distance of the measurement point from the EUT
- $d_{\text{limit}}$  is the reference distance or the distance of the  $\lambda/2\pi$  point.

As a result of this calculation, equivalent output power (dBµV/m ) at minimum distance of use between user and device is obtained, which is converted to Power Density units as follows:

$$PD (W/m^2) = FS_{\text{limit}} (V/m)^2 / 377$$