



HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID : UZ7TC78A1
Equipment : Touch Computer
Brand Name : Zebra
Model Name : TC78A1
M-Rating : M4
Applicant : Zebra Technologies Corporation
1 Zebra Plaza, Holtsville, NY 11742
Manufacturer : Zebra Technologies Corporation
1 Zebra Plaza, Holtsville, NY 11742
Standard : FCC 47 CFR §20.19
ANSI C63.19-2011

The product was received on Jul. 19, 2022 and testing was started from Sep. 13, 2022 and completed on Sep. 20, 2022. 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 63.19-2011 / 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.

Approved by: Cona Huang / Deputy Manager

SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory
No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.)



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History of this test report

Report No.	Version	Description	Issued Date
HA271554A	Rev. 01	Initial issue of report	Oct. 21, 2022



1. General Information

Product Feature & Specification	
Applicant Name	Zebra Technologies Corporation
Equipment Name	Touch Computer
Brand Name	Zebra
Model Name	TC78A1
FCC ID	UZ7TC78A1
Frequency Band	GSM850: 824.2 MHz ~ 848.8 MHz GSM1900: 1850.2 MHz ~ 1909.8 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 14: 788 MHz ~ 798 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 26: 814 MHz ~ 849 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 66: 1710 MHz ~ 1780 MHz LTE Band 71: 663 MHz ~ 698 MHz 5G NR n2 : 1850 MHz ~ 1910 MHz 5G NR n5 : 824 MHz ~ 849 MHz 5G NR n7 : 2500 MHz ~ 2570 MHz 5G NR n12 : 699 MHz ~ 716 MHz 5G NR n13: 777 MHz ~ 787 MHz 5G NR n14 : 788 MHz ~ 798 MHz 5G NR n25 : 1850 MHz ~ 1915 MHz 5G NR n26 : 814 MHz ~ 849 MHz 5G NR n38 : 2570 MHz ~ 2620 MHz 5G NR n41 : 2496 MHz ~ 2690 MHz 5G NR n48 : 3550 MHz ~ 3700 MHz 5G NR n66 : 1710 MHz ~ 1780 MHz 5G NR n71 : 663 MHz ~ 698 MHz 5G NR n77: 3450MHz ~ 3550MHz, 3700 MHz ~ 3980 MHz 5G NR n78: 3450MHz ~ 3550MHz, 3700 MHz ~ 3800 MHz WLAN 2.4GHz Band: 2400 MHz ~ 2483.5 MHz WLAN 5.2G Band: 5150 MHz ~ 5250 MHz WLAN 5.3G Band: 5250 MHz ~ 5350 MHz WLAN 5.5G Band: 5470 MHz ~ 5725 MHz WLAN 5.8G Band: 5725 MHz ~ 5850 MHz WLAN 6E: 5925 MHz ~ 6425 MHz, 6425 MHz ~ 6525 MHz, 6525 MHz ~ 6875 MHz, 6875 MHz ~ 7125 MHz Bluetooth: 2400 MHz ~ 2483.5 MHz RFID : 13.56 MHz
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA LTE: QPSK, 16QAM, 64QAM, 256QAM 5G NR: DFT-s-OFDM/CP-OFDM, Pi/2 BPSK/QPSK/16QAM/64QAM/256QAM WLAN: 802.11a/b/g/n/ac/ax HT20/HT40/VHT20/VHT40/VHT80/VHT160/HE20/HE40/HE80/HE160 Bluetooth BR/EDR/LE RFID:ASK
HW Version	EV2
SW Version	athena_A11_userdebug_GMS_RelKey_2022-07-14-1733_product_SE
FW Version	FUSION_QA_4_1.2.0.001_R
MFD	11JUN22
DUT Stage	Identical Prototype
Remark:	1. There are three kinds of samples as below. Selects sample 1 to evaluated RF Emission for all air interface and sample 2 and 3 spot check worst case found sample 1. 2. This device also had three kinds of batteries, RF exposure evaluation is selected Battery 1 as the main tested, Battery 2 and 3 will spot check worst case found in Battery 1



Sample List	
Sample 1	SE4770 + Base config
Sample 2	Lowell + Premium config
Sample 3	Lowell + Base config

Specification of Accessories				
Adapter	Brand Name	Zebra	Model	SAWA-65-20005A
			Part Number	PWR-WUA5V12W0US
Battery 1X	Brand Name	Zebra	Model	BT-000442
			Part Number	BT-000442-0020
Battery 1.5X	Brand Name	Zebra	Model	BT-000442
			Part Number	BT-000442-0820
Wireless Battery	Brand Name	Zebra	Model	BT-000442
			Part Number	BT-000442-002A
USB TYPE A to TYPE C cable	Brand Name	Zebra	Part Number	CBL-TC5X-USBC2A-01
USB TYPE C to 3.5mm audio connector	Brand Name	Zebra	Part Number	ADP-USBC-35MM1-01
3.5mm Earphone	Brand Name	Zebra	Part Number	HDST-35MM-PTVP-01
USB TYPE C Earphone	Brand Name	Zebra	Part Number	HPST-USBC-PTT1-01
Trigger Handle	Brand Name	Zebra	Part Number	TRG-NGTC5-ELEC-01
Soft Holster	Brand Name	Zebra	Part Number	SG-NGTC5TC7-HLSTR-01
TC53/TC58 RUGGED BOOT	Brand Name	Zebra	Part Number	SG-NGTC5EXO1-01

Reviewed by: Jason Wang
Report Producer: Carlie Tsai



2. Testing Location

Sporton Lab is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 1190) and the FCC designation No. TW1190 under the FCC 2.948(e) by Mutual Recognition Agreement (MRA) in FCC test.

Testing Laboratory	
Test Site	SPORTON INTERNATIONAL INC.
Test Site Location	No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.) TEL: +886-3-327-3456 FAX: +886-3-328-4978
Test Site No.	Sporton Site No.: SAR04-HY

3. Applied Standards

- FCC CFR47 Part 20.19
- ANSI C63.19-2011
- FCC KDB 285076 D01 HAC Guidance v06
- FCC KDB 285076 D03 HAC FAQ v01r05

4. RF Audio Interference Level

FCC wireless hearing aid compatibility rules ensure that consumers with hearing loss are able to access wireless communications services through a wide selection of handsets without experiencing disabling radio frequency (RF) interference or other technical obstacles.

To define and measure the hearing aid compatibility of handsets, in CFR47 part 20.19 ANSI C63.19 is referenced. A handset is considered hearing aid-compatible for acoustic coupling if it meets a rating of at least M3 under ANSI C63.19, and A handset is considered hearing aid compatible for inductive coupling if it meets a rating of at least T3. According to ANSI C63.19 2011 version, for acoustic coupling, the RF electric field emissions of wireless communication devices should be measured and rated according to the emission level as below.

Emission Categories	E-field emissions	
	<960Mhz	>960Mhz
M1	50 to 55 dB (V/m)	40 to 45 dB (V/m)
M2	45 to 50 dB (V/m)	35 to 40 dB (V/m)
M3	40 to 45 dB (V/m)	30 to 35 dB (V/m)
M4	<40 dB (V/m)	<30 dB (V/m)

Table 5.1 Telephone near-field categories in linear units



5. Air Interface and Operating Mode

Air Interface	Band MHz	Type	C63.19 Tested	Simultaneous Transmitter	Name of Voice Service	Power Reduction
GSM	GSM850	VO	Yes	WLAN, BT	CMRS Voice	No
	GSM1900			WLAN, BT		No
	EDGE850	VD	Yes	WLAN, BT	WFC ⁽²⁾ / Google Duo	No
	EDGE1900			WLAN, BT		No
WCDMA	Band II	VO	No ⁽¹⁾	WLAN, BT	CMRS Voice	No
	Band IV			WLAN, BT		No
	Band V			WLAN, BT		No
	HSPA	VD	No ⁽¹⁾	WLAN, BT	WFC ⁽²⁾ / Google Duo	No
LTE (FDD)	Band 2	VD	No ⁽¹⁾	5G NR, WLAN, BT	VoLTE / WFC ⁽²⁾ / Google Duo	No
	Band 4			5G NR, WLAN, BT		No
	Band 5			5G NR, WLAN, BT		No
	Band 7			5G NR, WLAN, BT		No
	Band 12			5G NR, WLAN, BT		No
	Band 13			5G NR, WLAN, BT		No
	Band 14			5G NR, WLAN, BT		No
	Band 17			5G NR, WLAN, BT		No
	Band 25			5G NR, WLAN, BT		No
	Band 26			5G NR, WLAN, BT		No
	Band 66			5G NR, WLAN, BT		No
	Band 71			5G NR, WLAN, BT		No
LTE (TDD)	Band 38	VD	Yes	5G NR, WLAN, BT	VoLTE / WFC ⁽²⁾ / Google Duo	No
	Band 41			5G NR, WLAN, BT		No
	Band 48			5G NR, WLAN, BT		No
5G NR	n2	VD	No ⁽¹⁾	LTE, WLAN, BT	VoNR / WFC ⁽²⁾ / Google Duo	No
	n5			LTE, WLAN, BT		No
	n7			LTE, WLAN, BT		No
	n12			LTE, WLAN, BT		No
	n13			LTE, WLAN, BT		No
	n14			LTE, WLAN, BT		No
	n25			LTE, WLAN, BT		No
	n26			LTE, WLAN, BT		No
	n38			LTE, WLAN, BT		No
	n41			LTE, WLAN, BT		No
	n48			LTE, WLAN, BT		No
	n66			LTE, WLAN, BT		No
	n71			LTE, WLAN, BT		No
	n77			LTE, WLAN, BT		No
n78	LTE, WLAN, BT	No				
Wi-Fi	2450	VD	Yes	GSM, WCDMA, LTE, 5G NR, 5/6G WLAN	WFC ⁽²⁾ / Google Duo	No
	5200	VD	No ⁽¹⁾	GSM, WCDMA, LTE, 5G NR, 2.4G WLAN, BT		No
	5300			GSM, WCDMA, LTE, 5G NR, 2.4G WLAN, BT		No
	5500			GSM, WCDMA, LTE, 5G NR, 2.4G WLAN, BT		No
	5800			GSM, WCDMA, LTE, 5G NR, 2.4G WLAN, BT		No
Wi-Fi	6E	VD	No ⁽³⁾	GSM, WCDMA, LTE, 5G NR, 2.4G WLAN, BT	WFC ⁽²⁾ / Google Duo	No
BT	2450	DT	No	GSM, WCDMA, LTE, 5G NR	NA	No

Type Transport:
 VO= Voice only
 DT= Digital Transport only (no voice)
 VD= CMRS and IP Voice Service over Digital Transport

Remark:
 1. The air interface is exempted from testing by low power exemption that its average antenna input power plus its MIF is ≤17 dBm, and is rated as M4.
 2. The Workforce Connect (WFC) is an over-the-top (OTT) – voice services operating over IP, and this voice application was development and pre-installed on a wireless handset by the Zebra Technologies Corporation.
 3. The WiFi 6E above 6GHz portion is currently not within the scope of ANSI C63.19 and FCC HAC regulations therefore they were not evaluated.
 4. Because features of Google Duo allow the option of voice-only communications, Duo has been tested for HAC/T-Coil compatibility to ensure the best user experience.

6. Measurement System Specification

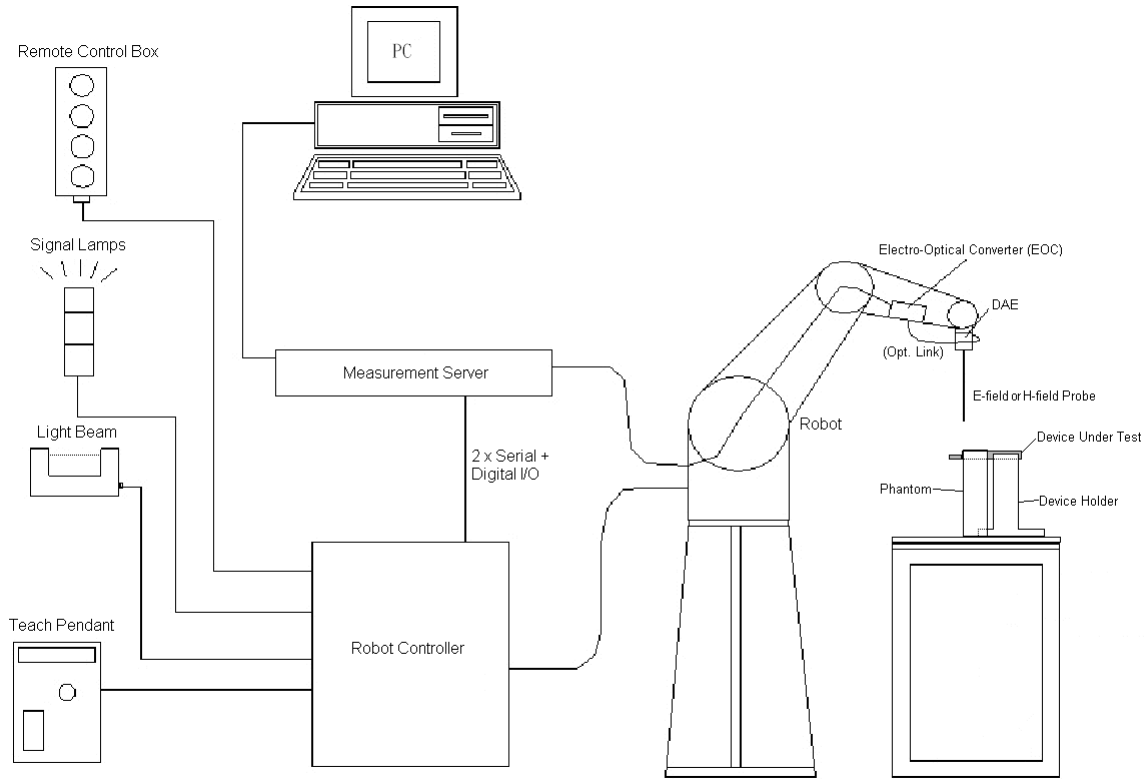


Fig 5.1 System Configurations

6.1 E-Field Probe System

E-Field Probe Specification

<ER3DV6>

Construction	One dipole parallel, two dipoles normal to probe axis Built-in shielding against static charges
Calibration	In air from 100 MHz to 3.0 GHz (absolute accuracy $\pm 6.0\%$, $k=2$)
Frequency	100 MHz to 6 GHz; Linearity: ± 2.0 dB (100 MHz to 3 GHz)
Directivity	± 0.2 dB in air (rotation around probe axis) ± 0.4 dB in air (rotation normal to probe axis)
Dynamic Range	2 V/m to 1000 V/m (M3 or better device readings fall well below diode compression point)
Linearity	± 0.2 dB
Dimensions	Overall length: 330 mm (Tip: 16 mm) Tip diameter: 8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.5 mm



Fig 5.2 Photo of E-field Probe

Probe Tip Description:

HAC field measurements take place in the close near field with high gradients. Increasing the measuring distance from the source will generally decrease the measured field values (in case of the validation dipole approx. 10% per mm).

6.2 Data Storage and Evaluation

The DASYS software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, and device frequency and modulation data) in measurement files.

Probe parameters :	- Sensitivity	Norm _i , a _{i0} , a _{i1} , a _{i2}
	- Conversion factor	ConvF _i
	- Diode compression point	dcp _i
Device parameters :	- Frequency	f
	- Crest factor	cf
Media parameters :	- Conductivity	σ
	- Density	ρ

The formula for each channel can be given as :

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with V_i = compensated signal of channel i , ($i = x, y, z$)
 U_i = input signal of channel i , ($i = x, y, z$)
 cf = crest factor of exciting field (DASY parameter)
 dcp_i = diode compression point (DASY parameter)

From the compensated input signals, the primary field data for each channel can be evaluated :

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

with V_i = compensated signal of channel i , ($i = x, y, z$)
 Norm_i = sensor sensitivity of channel i , ($i = x, y, z$), $\mu\text{V}/(\text{V}/\text{m})^2$ for E-field Probes
 ConvF = sensitivity enhancement in solution
 f = carrier frequency [GHz]
 E_i = electric field strength of channel i in V/m

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

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

The primary field data are used to calculate the derived field units.



7. RF Emissions Test Procedure

Referenced from ANSI C63.19 -2011 section 5.5.1

- a. Confirm the proper operation of the field probe, probe measurement system, and other instrumentation and the positioning system.
- b. Position the WD in its intended test position.
- c. Set the WD to transmit a fixed and repeatable combination of signal power and modulation characteristic that is representative of the worst case (highest interference potential) encountered in normal use. Transiently occurring start-up, changeover, or termination conditions, or other operations likely to occur less than 1% of the time during normal operation, may be excluded from consideration.
- d. The center sub-grid shall be centered on the T-Coil mode perpendicular measurement point or the acoustic output, as appropriate. Locate the field probe at the initial test position in the 50 mm by 50 mm grid, which is contained in the measurement plane, refer to illustrated in Figure 8.2. If the field alignment method is used, align the probe for maximum field reception.
- e. Record the reading at the output of the measurement system.
- f. Scan the entire 50 mm by 50 mm region in equality spaced increments and record the reading at each measurement point, The distance between measurement points shall be sufficient to assure the identification of the maximum reading.
- g. Identify the five contiguous sub-grids around the center sub-grid whose maximum reading is the lowest of all available choices. This eliminates the three sub-grids with the maximum readings. Thus, the six areas to be used to determine the WD's highest emissions are identified.
- h. Identify the maximum reading within the non-excluded sub-grids identified in step g).
 - i. Indirect measurement method
 - j. The RF audio interference level in dB (V/m) is obtained by adding the MIF (in dB) to the maximum steady-state rms field-strength reading, in dB (V/m)
- k. Compare this RF audio interference level with the categories in ANSI C63.19-2011 clause 8 and record the resulting WD category rating.
- l. For the T-Coil perpendicular measurement location is ≥ 5.0 mm from the center of the acoustic output, then two different 50 mm by 50 mm areas may need to be scanned, the first for the microphone mode assessment and the second for the T-Coil assessment.
- m. The second for the T-Coil assessment, with the grid shifted so that it is centered on the perpendicular measurement point. Record the WD category rating.

Test Instructions

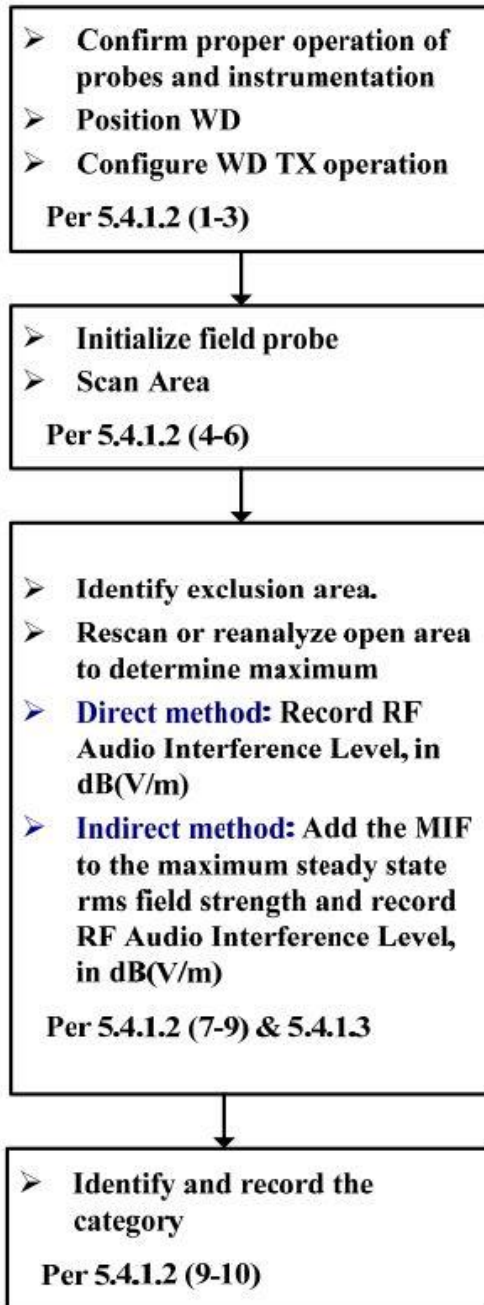


Figure 8.1 RF Emissions Flow Chart

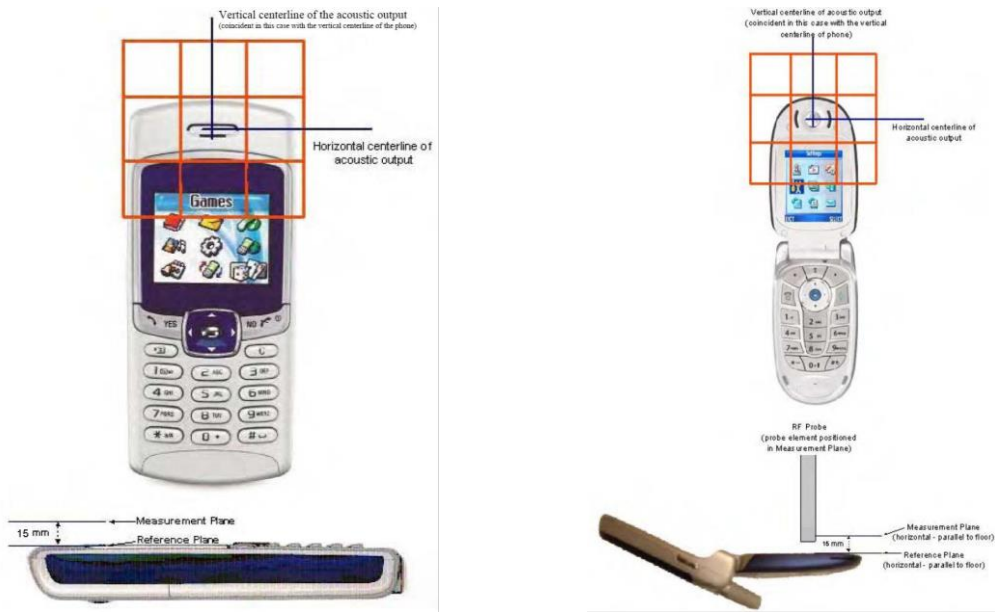


Fig 8.2 EUT reference and plane for HAC RF emission measurements

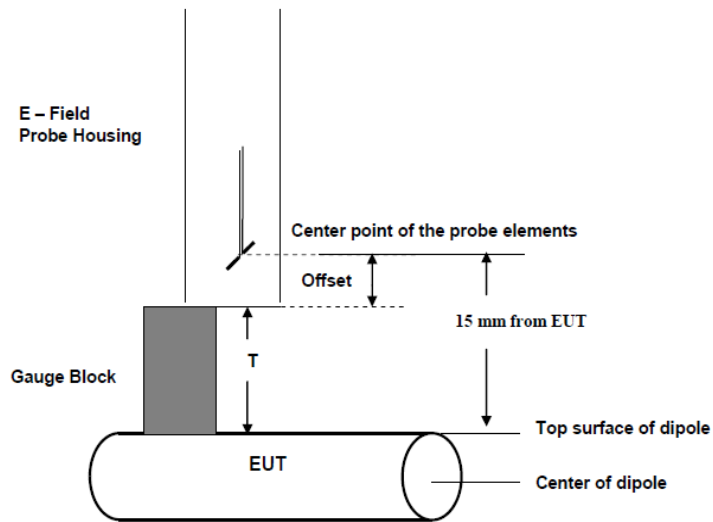


Fig. 8.3 Gauge block with E-field probe



8. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	835MHz Calibration Dipole	CD835V3	1045	Sep. 27, 2021	Sep. 26, 2022
SPEAG	1880MHz Calibration Dipole	CD1880V3	1038	Sep. 27, 2021	Sep. 26, 2022
SPEAG	2450MHz Calibration Dipole	CD2450V3	1186	Jan. 25, 2022	Jan. 24, 2023
SPEAG	2600Mhz Calibration Dipole ⁽²⁾	CD2600V3	1018	Aug. 24, 2021	Aug. 22, 2023
SPEAG	3500Mhz Calibration Dipole	CD3500V3	1009	Mar. 03, 2022	Mar. 02, 2023
SPEAG	Data Acquisition Electronics	DAE4	376	Nov. 22, 2021	Nov. 21, 2022
SPEAG	Data Acquisition Electronics	DAE4	1512	Mar. 29, 2022	Mar. 28, 2023
SPEAG	Isotropic E-Field Probe	EF3DV3	4047	Jan. 24, 2022	Jan. 23, 2023
SPEAG	Isotropic E-Field Probe	ER3DV6	2526	Mar. 28, 2022	Mar. 27, 2023
Testo	Hygro meter	608-H1	45196600	Oct. 22, 2021	Oct. 21, 2022
Testo	Hygro meter	608-H1	45207528	Oct. 22, 2021	Oct. 21, 2022
R&S	Wideband Radio Communication Tester	CMW500	115793	Nov. 30, 2021	Nov. 29, 2022
SPEAG	Test Arch Phantom	N/A	N/A	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR
Anritsu	Signal Generator	MG3710A	6201502524	Oct. 24, 2021	Oct. 23, 2022
Anritsu	Power Meter	ML2495A	1419002	Aug. 16, 2022	Aug. 15, 2023
Anritsu	Power Sensor	MA2411B	1911176	Aug. 16, 2022	Aug. 15, 2023
ATM	Dual Directional Coupler	C122H-10	P610410z-02	NCR	NCR
Woken	Attenuator	WK0602-XX	N/A	NCR	NCR
Anritsu	Spectrum Analyzer	MS2830A	6201396378	Jul. 21, 2022	Jul. 20, 2023
Anritsu	Spectrum Analyzer	N9010A	MY53470118	Jan. 12, 2022	Jan. 11, 2023
Mini-Circuits	Power Amplifier	ZVE-8G+	6418	Oct. 12, 2021	Oct. 11, 2022
Mini-Circuits	Power Amplifier	ZHL-42W+	715701915	May. 12, 2022	May. 11, 2023

Note:

1. NCR: "No-Calibration Required"
2. The dipole calibration interval can be extended to 3 years with justification according to KDB 865664 D01. 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.

9. Measurement System Validation

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the test Arch and a corresponding distance holder.

The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal HAC measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

<Test Setup>

1. In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator.
2. The center point of the probe element(s) is 15mm from the closest surface of the dipole elements.
3. The calibrated dipole must be placed beneath the arch phantom. The equipment setup is shown below:
4. The output power on dipole port must be calibrated to 20dBm (100mW) before dipole is connected.

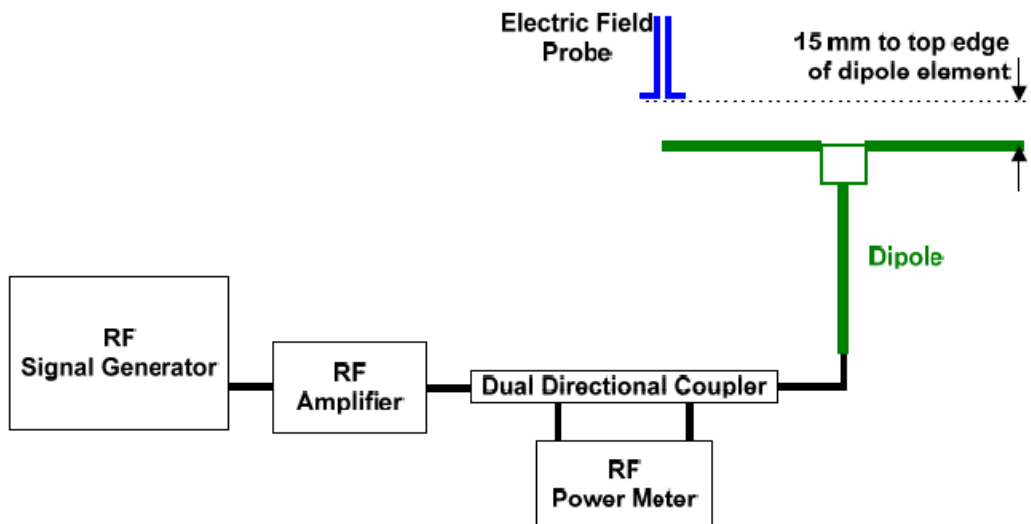


Fig. 7.1 Setup Diagram

<Validation Results>

Comparing to the original E-field value provided by SPEAG, the verification data should be within its specification of 25 %. Table 6.1 shows the target value and measured value. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to appendix A of this report.

Deviation = ((Average E-field Value) - (Target value)) / (Target value) * 100%

Frequency (MHz)	Input Power (dBm)	Target Value (V/m)	E-Field 1 (V/m)	E-Field 2 (V/m)	Average Value (V/m)	Deviation (%)	Date
835	20	106.8	106.8	106.7	106.75	-0.05	Sep. 13, 2022
835	20	106.8	122.2	105.3	113.75	6.51	Sep. 20, 2022
1880	20	85.5	86.75	87.99	87.37	2.19	Sep. 13, 2022
1880	20	85.5	89.63	92.68	91.155	6.61	Sep. 20, 2022
2450	20	84.7	82.28	86.74	84.51	-0.22	Sep. 20, 2022
2450	20	84.7	80.07	81.57	80.82	-4.58	Sep. 20, 2022
2600	20	86.1	83.61	86.6	85.105	-1.16	Sep. 13, 2022
2600	20	86.1	86.16	87.35	86.755	0.76	Sep. 20, 2022
3500	20	83.4	88.17	86.95	87.56	4.99	Sep. 20, 2022



10. Modulation Interference Factor

The HAC Standard ANSI C63.19-2011 defines a new scaling using the Modulation Interference Factor (MIF). For any specific fixed and repeatable modulated signal, a modulation interference factor (MIF, expressed in dB) 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 and 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

The Modulation Interference factor (MIF, in dB) is added to the measured average E-field (in dBV/m) and converts it to the RF Audio Interference level (in dBV/m). This level considers the audible amplitude modulation components in the RF E-field. CW fields without amplitude modulation are assumed to not interfere with the hearing aid electronics. Modulations without time slots and low fluctuations at low frequencies have low MIF values, TDMA modulations with narrow transmission and repetition rates of few 100 Hz have high MIF values and give similar classifications as ANSI C63.19-2011.

ER3D, EF3D and EU2D E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the indirect measurement method according to ANSI C63.19-2011 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by PMR calibration in order to not overestimate the field reading. Probe Modulation Response (PMR) calibration linearizes the probe response over its dynamic range for specific modulations which are characterized by their UID and result in an uncertainty specified in the probe calibration certificate. The MIF is characteristic for a given waveform envelope and can be used as a constant conversion factor if the probe has been PMR calibrated.

The evaluation method for the MIF is defined in ANSI C63.19-2011 section D.7. An RMS demodulated RF signal is fed to a spectral filter (similar to an A weighting filter) and forwarded to a temporal filter acting as a quasi-peak detector. The averaged output of these filtering is scaled to a 1 kHz 80% AM signal as reference. MIF measurement requires additional instrumentation and is not well suited for evaluation by the end user with reasonable uncertainty. It may alternatively be determined through analysis and simulation, because it is constant and characteristic for a communication signal. DASY52 uses well-defined signals for PMR calibration. The MIF of these signals has been determined by simulation and it is automatically applied.

The MIF measurement uncertainty is estimated as follows, declared by HAC equipment provider SPEAG, for modulation frequencies from slotted waveforms with fundamental frequency and at least 2 harmonics within 10 kHz:

- 1. 0.2 dB for MIF: -7 to +5 dB
2. 0.5 dB for MIF: -13 to +11 dB
3. 1 dB for MIF: > -20 dB

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 Low-power Exemption.

Table with 3 columns: UID, Communication System Name, MIF(dB). Rows include GSM-FDD, EDGE-FDD, UMTS-FDD, LTE-FDD, LTE-TDD, 5G NR, and various IEEE WiFi standards.



11. Low-power Exemption

<Max Tune-up Limit>

WWAN

Radio Tech	Band Number	Average Power (dBm)									
		Ant 0	Ant 1	Ant 2	Ant 3	Ant 4	Ant 5	Ant 6	Ant 7	Ant 11	Ant 12
GSM/GPRS 1TX	850					33.50					
EGPRS 1TX	850					28.00					
GSM/GPRS 1TX	1900					30.50					
EGPRS 1TX	1900					27.00					
WCDMA	B2			25.20							
WCDMA - HSPA	B2			24.20							
WCDMA	B4			25.20							
WCDMA - HSPA	B4			24.20							
WCDMA	B5					25.20					
WCDMA - HSPA	B5					24.20					
LTE	B2			25.20		24.70					
LTE	B4			25.20		25.20					
LTE	B5					25.20					
LTE	B7							24.00			
LTE	B12	24.70									
LTE	B13	24.50									
LTE	B14	24.70									
LTE	B17	24.70									
LTE	B25			25.20		24.70					
LTE	B26					25.20					
LTE	B38							24.50			
LTE	B41 PC3							25.00			
LTE	B41 PC2							27.00			
LTE	B48									22.00	22.00
LTE	B66			25.20		24.70					
LTE	B71	24.70									
5G FR1	n2			24.00		24.00					
5G FR1	n5					25.20					
5G FR1	n7							24.00			
5G FR1	n12	24.70									
5G FR1	n13	24.50									
5G FR1	n14	24.70									
5G FR1	n25			25.20		25.20					
5G FR1	n26					25.20					
5G FR1	n38							24.50			
5G FR1	n41 PC3		25.00					25.00	25.00		25.00
5G FR1	n41 PC2		27.00					27.00	27.00		27.00
5G FR1	n48									22.00	22.00
5G FR1	n66			25.20		25.20					
5G FR1	n71	24.70									
5G FR1	n77 PC3				23.00		25.00			25.00	25.00
5G FR1	n78 PC3				23.00		25.00			25.00	25.00
5G FR1	n77 PC2									26.50	26.50
5G FR1	n78 PC2									26.50	26.50



<Low Power Exemption>

WWAN

General Note:

1. EDGE data mode test can be covered by GSM Voice mode, as GSM voice mode represents the worst case.
2. According to ANSI C63.19 2011-version, for the air interface technology of a device is exempt from testing when its average antenna input power plus its MIF is ≤ 17 dBm for any of its operating modes.
3. The LTE – TDD_PC2 was verify worst case from LTE – TDD_PC3.
4. HAC RF rating is M4 for the air interface which meets the low power exemption.

Ant 0				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE - FDD	24.70	-9.76	14.94	No
5G FR1 - FDD	24.70	-12.08	12.62	No

Ant 1				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G FR1 – TDD_PC3	25.00	-12.08	12.92	No
5G FR1 – TDD_PC2	27.00	-12.08	14.92	No

Ant 2				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
WCDMA	25.20	-25.43	-0.23	No
WCDMA - HSPA	24.20	-20.39	3.81	No
LTE - FDD	25.20	-9.76	15.44	No
5G FR1 - FDD	25.20	-12.08	13.12	No

Ant 3				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	23.00	-12.08	10.92	No

Ant 4				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
GSM850	33.50	3.63	37.13	Yes
EDGE850	28.00	3.75	31.75	Yes ⁽¹⁾
GSM1900	30.50	3.63	34.13	Yes
EDGE1900	27.00	3.75	30.75	Yes ⁽¹⁾
WCDMA	25.20	-25.43	-0.23	No
WCDMA - HSPA	24.20	-20.39	3.81	No
LTE - FDD	25.20	-9.76	15.44	No
5G FR1 - FDD	25.20	-12.08	13.12	No

Ant 5				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	25.00	-12.08	12.92	No



Ant 6				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE - FDD	24.00	-9.76	14.24	No
LTE – TDD_PC3	25.00	-1.44	23.56	Yes
LTE – TDD_PC2	27.00	-1.44	25.56	Yes
5G FR1 - FDD	24.00	-12.08	11.92	No
5G NR - TDD_PC3	25.00	-12.08	12.92	No
5G NR - TDD_PC2	27.00	-12.08	14.92	No

Ant 7				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD_PC3	25.00	-12.08	12.92	No
5G NR - TDD_PC2	27.00	-12.08	14.92	No

Ant 11				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE – TDD	22.00	-1.44	20.56	Yes
5G NR - TDD_PC3	25.00	-12.08	12.92	No
5G NR - TDD_PC2	26.50	-12.08	14.42	No

Ant 12				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE – TDD	22.00	-1.44	20.56	Yes
5G NR - TDD_PC3	25.00	-12.08	12.92	No
5G NR - TDD_PC2	27.00	-12.08	14.92	No



WLAN

General Note:

1. 802.11b modes is not necessary due the 802.11g mode is the worst case.
2. According to ANSI C63.19 2011-version, for the air interface technology of a device is exempt from testing when its average antenna input power plus its MIF is ≤ 17 dBm for any of its operating modes.
3. HAC RF rating is M4 for the air interface which meets the low power exemption.

Antenna	Maximum Power (dBm)	
2.4GHz WLAN	802.11b	21.00
	802.11g	19.50
	802.11n-HT20	18.50
	802.11n-HT40	18.50
	802.11ac-VHT20	18.50
	802.11ac-VHT40	18.50
	802.11ax-HE20	19.00
	802.11ax-HE40	18.50
5GHz WLAN	802.11a	17.50
	802.11n-HT20	17.50
	802.11n-HT40	16.50
	802.11ac-VHT20	17.50
	802.11ac-VHT40	16.50
	802.11ac-VHT80	15.00
	802.11ac-VHT160	13.50
	802.11ax-HE20	17.50
	802.11ax-HE40	16.50
	802.11ax-HE80	15.50
	802.11ax-HE160	13.50

Ant 9+8				
Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
802.11b	21.00	-2.02	18.98	Yes ⁽¹⁾
802.11g	19.50	0.12	19.62	Yes
802.11n-HT20	18.50	-13.44	5.06	No
802.11n-HT40	18.50	-13.44	5.06	No
802.11ac-VHT20	18.50	-5.57	12.93	No
802.11ac-VHT40	18.50	-5.57	12.93	No
802.11ax-HE20	19.00	-5.58	13.42	No
802.11ax-HE40	18.50	-5.58	12.92	No
802.11a	17.50	-3.15	14.35	No
802.11n-HT20	17.50	-13.44	4.06	No
802.11n-HT40	16.50	-13.44	3.06	No
802.11ac-VHT20	17.50	-5.57	11.93	No
802.11ac-VHT40	16.50	-5.57	10.93	No
802.11ac-VHT80	15.00	-5.57	9.43	No
802.11ac-VHT160	13.50	-5.57	7.93	No
802.11ax-HE20	17.50	-5.58	11.92	No
802.11ax-HE40	16.50	-5.58	10.92	No
802.11ax-HE80	15.50	-5.58	9.92	No
802.11ax-HE160	13.50	-5.58	7.92	No



12. Conducted RF Output Power (Unit: dBm)

<GSM 850/GSM1900_Ant 4>

Average Antenna Input Power(dBm)						
Band	GSM850			GSM1900		
Channel	128	189	251	512	661	810
Frequency (MHz)	824.2	836.4	848.8	1850.2	1880.0	1909.8
GSM (GMSK, 1 Tx slot)	32.45	32.44	32.43	29.47	29.38	29.49

<TDD LTE Band 41_Ant 6>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	Power Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.
Channel				39750	40185	40620	41055	41490
Frequency (MHz)				2506	2549.5	2593	2636.5	2680
20	QPSK	1	0	23.11	23.19	23.14	23.39	23.32

<TDD LTE Band 41 HPUE_Ant 6>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	Power Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.
Channel				39750	40185	40620	41055	41490
Frequency (MHz)				2506	2549.5	2593	2636.5	2680
20	QPSK	1	0	25.10	25.21	25.05	25.26	25.22

<TDD LTE Band 48_Ant 11>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	for EMC Power Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.
Channel				55340	55830	55990	56150	56640
Frequency (MHz)				3560	3609	3625	3641	3690
20	QPSK	1	0	20.92	20.97	20.89	20.96	20.76

<TDD LTE Band 48_Ant 12>

BW [MHz]	Modulation	RB Size	RB Offset	Power Low Ch. / Freq.	Power Low Middle Ch. / Freq.	for EMC Power Middle Ch. / Freq.	Power High Middle Ch. / Freq.	Power High Ch. / Freq.
Channel				55340	55830	55990	56150	56640
Frequency (MHz)				3560	3609	3625	3641	3690
20	QPSK	1	0	21.63	21.56	21.59	21.61	21.76

<WLAN 2.4GHz Ant 9+8>

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)
	802.11g 6Mbps	1	2412	20.86
		6	2437	22.01
		11	2462	19.76



13. HAC RF Emission Test Results

Plot No.	Air Interface	Modulation / Mode	Channel	Sample	Battery	Transmit Ant.	Average Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
1	GSM850	Voice	128	1	Battery 1	Ant 4	32.45	3.63	32.75	12.25	M4
2	GSM850	Voice	189	1	Battery 1	Ant 4	32.44	3.63	33.21	11.79	M4
3	GSM850	Voice	251	1	Battery 1	Ant 4	32.43	3.63	33.30	11.70	M4
4	GSM850	Voice	251	1	Battery 2	Ant 4	32.43	3.63	32.59	12.41	M4
5	GSM850	Voice	251	1	Battery 3	Ant 4	32.43	3.63	32.79	12.21	M4
6	GSM850	Voice	251	2	Battery 1	Ant 4	32.43	3.63	33.66	11.34	M4
7	GSM850	Voice	251	3	Battery 1	Ant 4	32.43	3.63	33.28	11.72	M4
8	GSM1900	Voice	512	1	Battery 1	Ant 4	29.47	3.63	25.19	9.81	M4
9	GSM1900	Voice	661	1	Battery 1	Ant 4	29.38	3.63	25.59	9.41	M4
10	GSM1900	Voice	810	1	Battery 1	Ant 4	29.49	3.63	25.56	9.44	M4
11	GSM1900	Voice	661	1	Battery 2	Ant 4	29.38	3.63	22.44	12.56	M4
12	GSM1900	Voice	661	1	Battery 3	Ant 4	29.38	3.63	22.70	12.30	M4
13	GSM1900	Voice	661	2	Battery 1	Ant 4	29.38	3.63	26.10	8.90	M4
14	GSM1900	Voice	661	3	Battery 1	Ant 4	29.38	3.63	22.23	12.77	M4
15	LTE Band 41	20M_QPSK_1_0	39750	1	Battery 1	Ant 6	23.11	-1.44	22.31	12.69	M4
16	LTE Band 41	20M_QPSK_1_0	40620	1	Battery 1	Ant 6	23.14	-1.44	24.79	10.21	M4
17	LTE Band 41	20M_QPSK_1_0	41490	1	Battery 1	Ant 6	23.32	-1.44	25.02	9.98	M4
18	LTE Band 41 HPUE	20M_QPSK_1_0	41490	1	Battery 1	Ant 6	25.22	-1.44	23.51	11.49	M4
19	LTE Band 41	20M_QPSK_1_0	41490	1	Battery 2	Ant 6	23.32	-1.44	23.46	11.54	M4
20	LTE Band 41	20M_QPSK_1_0	41490	1	Battery 3	Ant 6	23.32	-1.44	23.84	11.16	M4
21	LTE Band 41	20M_QPSK_1_0	41490	2	Battery 1	Ant 6	23.32	-1.44	27.44	7.56	M4
22	LTE Band 41	20M_QPSK_1_0	41490	3	Battery 1	Ant 6	23.32	-1.44	22.89	12.11	M4
23	LTE Band 48	20M_QPSK_1_0	55340	1	Battery 1	Ant 12	21.63	-1.44	20.48	14.52	M4
24	LTE Band 48	20M_QPSK_1_0	55830	1	Battery 1	Ant 12	21.56	-1.44	20.01	14.99	M4
25	LTE Band 48	20M_QPSK_1_0	56640	1	Battery 1	Ant 12	21.76	-1.44	18.46	16.54	M4
26	LTE Band 48	20M_QPSK_1_0	55340	1	Battery 2	Ant 12	21.63	-1.44	17.13	17.87	M4
27	LTE Band 48	20M_QPSK_1_0	55340	1	Battery 3	Ant 12	21.63	-1.44	17.18	17.82	M4
28	LTE Band 48	20M_QPSK_1_0	55340	2	Battery 1	Ant 12	21.63	-1.44	19.21	15.79	M4
29	LTE Band 48	20M_QPSK_1_0	55340	3	Battery 1	Ant 12	21.63	-1.44	17.74	17.26	M4
30	LTE Band 48	20M_QPSK_1_0	55340	1	Battery 1	Ant 11	20.92	-1.44	21.36	13.64	M4
31	LTE Band 48	20M_QPSK_1_0	55830	1	Battery 1	Ant 11	20.97	-1.44	20.85	14.15	M4
32	LTE Band 48	20M_QPSK_1_0	56640	1	Battery 1	Ant 11	20.76	-1.44	21.80	13.20	M4
33	LTE Band 48	20M_QPSK_1_0	56640	1	Battery 2	Ant 11	20.76	-1.44	20.65	14.35	M4
34	LTE Band 48	20M_QPSK_1_0	56640	1	Battery 3	Ant 11	20.76	-1.44	20.39	14.61	M4
35	LTE Band 48	20M_QPSK_1_0	56640	2	Battery 1	Ant 11	20.76	-1.44	21.28	13.72	M4
36	LTE Band 48	20M_QPSK_1_0	56640	3	Battery 1	Ant 11	20.76	-1.44	22.05	12.95	M4
37	WLAN2.4GHz	802.11g 6Mbps	1	1	Battery 1	Ant 9+8	20.86	0.12	28.39	6.61	M4
38	WLAN2.4GHz	802.11g 6Mbps	6	1	Battery 1	Ant 9+8	22.01	0.12	29.12	5.88	M4
39	WLAN2.4GHz	802.11g 6Mbps	11	1	Battery 1	Ant 9+8	19.76	0.12	26.28	8.72	M4
40	WLAN2.4GHz	802.11g 6Mbps	6	1	Battery 2	Ant 9+8	22.01	0.12	27.55	7.45	M4
41	WLAN2.4GHz	802.11g 6Mbps	6	1	Battery 3	Ant 9+8	22.01	0.12	28.03	6.97	M4
42	WLAN2.4GHz	802.11g 6Mbps	6	2	Battery 1	Ant 9+8	22.01	0.12	28.89	6.11	M4
43	WLAN2.4GHz	802.11g 6Mbps	6	3	Battery 1	Ant 9+8	22.01	0.12	29.71	5.29	M4

Remark:

1. The HAC measurement system applies MIF value onto the measured RMS E-field, which is indirect method in ANSI C63.19 2011 version, and reports the RF audio interference level.
2. Phone Condition: Mute on; Backlight off; Max Volume

Test Engineer : EN Liu and Carter Jhuang



14. Uncertainty Assessment

The component of uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty 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 in Table 12.1.

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

Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (E)	Standard Uncertainty (E)
Measurement System					
Probe Calibration	5.1	Normal	1	1	± 5.1 %
Axial Isotropy	4.7	Rectangular	√3	1	± 2.7 %
Sensor Displacement	16.5	Rectangular	√3	1	± 9.5 %
Boundary Effects	2.4	Rectangular	√3	1	± 1.4 %
Phantom Boundary Effects	7.2	Rectangular	√3	1	± 4.1 %
Linearity	4.7	Rectangular	√3	1	± 2.7 %
Scaling with PMR Calibration	10.0	Rectangular	√3	1	± 5.77 %
System Detection Limit	1.0	Rectangular	√3	1	± 0.6 %
Readout Electronics	0.3	Normal	1	1	± 0.3 %
Response Time	0.8	Rectangular	√3	1	± 0.5 %
Integration Time	2.6	Rectangular	√3	1	± 1.5 %
RF Ambient Conditions	3.0	Rectangular	√3	1	± 1.7 %
RF Reflections	12.0	Rectangular	√3	1	± 6.9 %
Probe Positioner	1.2	Rectangular	√3	1	± 0.7 %
Probe Positioning	4.7	Rectangular	√3	1	± 2.7 %
Extrap. and Interpolation	1.0	Rectangular	√3	1	± 0.6 %
Test Sample Related					
Device Positioning Vertical	4.7	Rectangular	√3	1	± 2.7 %
Device Positioning Lateral	1.0	Rectangular	√3	1	± 0.6 %
Device Holder and Phantom	2.4	Rectangular	√3	1	± 1.4 %
Power Drift	5.0	Rectangular	√3	1	± 2.9 %
Phantom and Setup Related					
Phantom Thickness	2.4	Rectangular	√3	1	± 1.4 %
Combined Standard Uncertainty					± 16.30 %
Coverage Factor for 95 %					K = 2
Expanded Std. Uncertainty on Power					± 32.6 %
Expanded Std. Uncertainty on Field					± 16.3 %
Declaration of Conformity: The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.					
Comments and Explanations: 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.					

Uncertainty Budget of HAC free field assessment



15. References

- [1] ANSI C63.19-2011, "American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids", 27 May 2011.
- [2] FCC KDB 285076 D01v06, "Equipment Authorization Guidance for Hearing Aid Compatibility", Feb. 2022.
- [3] FCC KDB 285076 D03v01r05, "Hearing aid compatibility frequently asked questions", Feb. 2022
- [4] SPEAG DASY System Handbook