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Deutsche
Akkreditierungsstelle
D-PL-12155-01-03

Recognized until 2023-03-16 by the
Department of Innovation, Science and Economic Development Canada (ISED)
as a recognized testing laboratory
CAB identifier: DE0011
Company number: 3472A

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The technical accuracy is guaranteed through the quality management of
Element Materials Technology Straubing GmbH.

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1 Summary of test results

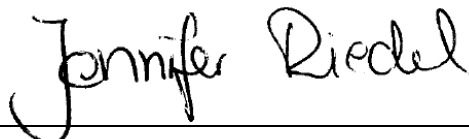
1.1 FCC standard

<i>FCC standard</i>	<i>Requirement</i>	<i>Page</i>	<i>Result</i>
47 CFR Part 2, § 2.1093	SAR test exclusion, except WPT	9	Passed
47 CFR Part 2, § 2.1093	Simultaneous transmissions - SAR test exclusion, except WPT	14	Passed

1.2 IC standard

<i>IC standard</i>	<i>Requirement</i>	<i>Page</i>	<i>Result</i>
RSS-102 Issue 5, section 2.5.1	Frequency range 3 kHz up to 10 MHz	16	Passed
RSS-102 Issue 5, section 2.5.1	SAR test exclusion, except 3 kHz – 10 MHz	22	Passed
RSS-102 Issue 5, section 2.5.1	Simultaneous transmissions SAR test exclusion, except 3 kHz – 10 MHz	26	Passed

Straubing, August 4, 2022



Tested by
Jennifer Riedel B. Eng.
Radio Test Engineer



Approved by
Konrad Graßl
Department Manager Radio

2 Test regulations

2.1 FCC standards

<i>Standard</i>	<i>Title</i>
OET Bulletin 65, 65A, 65B Edition 97-01, August 1997	Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields
Part 1, Subpart I, Section 1.1307 October 2021	Actions that may have a significant environmental effect, for which Environmental Assessment (EAs) must be prepared.
Part 1, Subpart I, Section 1.1310 October 2021	Radiofrequency radiation exposure limits
Part 1, Subpart 2, Section 2.1093 October 2021	Radiofrequency radiation exposure evaluation: portable devices.
KDB 447498 D04 v01 November 29, 2021	RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices
ANSI C96.1: 2005	IEEE Standard for Safety Levels with respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz
ANSI C63.10 June, 2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
Presentation of TCB Workshop April 27, 2022	Mobile and Portable Device RF Exposure Policies KDB Publication 447498 D01

2.2 IC standards

<i>Standard</i>	<i>Title</i>
RSS-102 Issue 5 (March 19, 2015) Amendment 1 (February 2, 2021)	Spectrum Management and Telecommunications Radio Standards Specification Radio Frequency (RF) Exposure Compliance of Radio communication Apparatus (All Frequency Bands)
SPR-002 Issue 1 (September 2016)	Spectrum Management and Telecommunications Supplementary Procedure Supplementary Procedure for Assessing Compliance with RSS-102 Nerve Stimulation Exposure Limits
Safety Code 6 (2020)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz
IEEE C95.3-2002 (R2008) Approved December 11, 2002 Reaffirmed June 12, 2008	IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to Such Fields, 100 kHz–300 GHz
Notice 2016-DRS001 September 20, 2016 Updated July 2020	Applicability of Latest FCC RF Exposure KDB Procedures and Other Procedures
KDB 447498 D01 v06	Mobile and portable devices RF Exposure procedures and equipment authorisation policies, October 23, 2015.

3 Equipment under Test

3.1 General information

Product type:	RFID reader / writer module	
Model Name:	TWN4 Lepto M	
Serial number:	2022197940	
Manufacturer:	Elatec GmbH	
Version:	Hardware:	B
	Software:	B1.08/NKF4.06/STDC2.04
Short description:	EUT is a RFID reader / writer module operating at the frequencies 125 kHz and 13.56 MHz. In the EUT a fully tested Bluetooth Low Energy module is integrated.	
FCC ID:	WP5TWN4F18	
IC certification number:	7948A-TWN4F18	
Technology 1:	RFID	
Operating frequency:	125 kHz	
Antenna types:	Loop antenna	
	<input type="checkbox"/> detachable	<input checked="" type="checkbox"/> not detachable
Technology 2:	RFID	
Operating frequency:	13.56 MHz	
Antenna types:	Loop antenna	
	<input type="checkbox"/> detachable	<input checked="" type="checkbox"/> not detachable
Technology 3:	Bluetooth low energy	
Operating frequency band:	2400 MHz to 2483.5 MHz	
Antenna types:	Dipole antenna	
	<input type="checkbox"/> detachable	<input checked="" type="checkbox"/> not detachable
Power supply:	DC supply Nominal voltage: 5 V	
Exposure tier:	<input checked="" type="checkbox"/> Head	
	<input checked="" type="checkbox"/> Body	
	<input type="checkbox"/> Limbs	
	<input type="checkbox"/> other	
	<input type="checkbox"/> See appropriate results	
Separation distance:	<input checked="" type="checkbox"/> ≤ 20 cm	
	<input type="checkbox"/> > 20 cm	
	<input type="checkbox"/> See appropriate results	
Evaluated against exposure limits:	<input checked="" type="checkbox"/> General public use	
	<input type="checkbox"/> Controlled use	

3.2 Photographs of EUT

See Annex C of test report 220262-AU01+W05 of test laboratory Element Materials Technology Straubing GmbH.

4 Test results

This clause gives details about the test results as collected in the summary of test results on page 4.

The climatic conditions are recorded during the tests. It is ensured that the climatic conditions are within the following ranges:

<i>Ambient temperature</i>	<i>Ambient humidity</i>	<i>Ambient pressure</i>
15°C to 35°C	30 % to 75 %	86 kPa to 106 kPa

4.1 FCC

4.1.1 SAR test exclusion, except WPT

Requirement: Part 2, §2.1093
 Reference: KDB 447498 D04 v01

Performed by:	Jennifer Riedel B. Eng.	Date of test:	August 4, 2022
Result:	<input checked="" type="checkbox"/> Limits kept	<input type="checkbox"/> Limits not kept	

4.1.1.1 Requirements and limits for separation distance ≤ 20 cm

According to §2.1093(b):

For purposes of this section, the definitions in §1.1307(b)(2) of this chapter shall apply. A portable device is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that the RF source's radiating structure(s) is/are within 20 centimeters of the body of the user.

According to §2.1093(c)(1):

Evaluation of compliance with the exposure limits in §1.1310 of this chapter, and preparation of an EA if the limits are exceeded, is necessary for portable devices having single RF sources with more than an available maximum time-averaged power of 1 mW, more than the ERP listed in Table 1 to §1.1307(b)(3)(i)(C), or more than the P_{th} in the following formula, whichever is greater. The following formula shall only be used in conjunction with portable devices not exempt by §1.1307(b)(3)(i)(C) at distances from 0.5 centimeters to 20 centimeters and frequencies from 0.3 GHz to 6 GHz.

Note:

1. According to the TCB Workshop on April 27, 2022 P_{th} can be calculated to the extended frequency range 100 kHz to 6 GHz. The formulas in the presentation of the TCB workshop beginning at slide 17 were used in addition to the KDB 447498 D04 v01.

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

Where

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

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

Table 1: Formula for calculation P_{th}

d = the minimum separation distance (cm) in any direction from any part of the device antenna(s) or radiating structure(s) to the body of the device user.

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	$0.0128 R^2f$.
1,500-100,000	$19.2R^2$.

Table 2: Table 1 to §1.1307(b)(3)(i)(C)—Single RF Sources Subject to Routine Environmental Evaluation

4.1.1.2 Process to determine RF Exposure Compliance

According to Appendix A of KDB 447498 D04 Interim General RF Exposure Guidance V01: Generally, the sequence to apply for single portable RF sources includes the following steps:

- 1) Determination of 1 mW exemption
- 2) Determination of exemption according to Table 2
- 3) Determination of exemption according to formula in Table 1

4.1.1.3 Results

RF technology 1:

The following data are based on applicants document: Test report 220262-AU01+W06 of the test laboratory Element Materials Technology Straubing GmbH

Application:	RFID
Operation frequency:	125 kHz
Maximum field strength:	-26.59 dB μ V/m at 300 m

Information related to Exposure:

Tune-up tolerance (according to the manufacturer):	1 dB
Separation distance:	< 5 mm
Exposure tier:	general public
Power averaging over time:	not applied
Applied determination process:	Step 3 of clause 4.1.1.2

Separation distance (mm)	Channel frequency (kHz)	ERP + tolerance (dBm)	ERP + tolerance (mW)	Limit (mW)	Ratio of limit	Result
< 5	125	-82.90	$5.13 \cdot 10^{-9}$	1807.34	$2.84 \cdot 10^{-12}$	Passed

Table 3: Result of SAR test exclusion, exposure to the head and body

EIRP is calculated using the formula of ANSI C63.10-2013 clause 9.5:

$$\text{EIRP} = E + 20\log(d) - 104.7$$

Where: EIRP = equivalent isotropically radiated power in dBm
 E = electric field strength in dB μ V/m
 d = measurement distance in meters (m)

$$\text{ERP} = \text{EIRP} - 2.15 \text{ dB}$$

RF technology 2:

The following data are based on applicants document: Test report 220262-AU01+W05 of the test laboratory Element Materials Technology Straubing GmbH

Application: RFID
 Operation frequency: 13.56 MHz
 Maximum field strength: 32.80 dBµV/m at 30 m

Information related to Exposure:

Tune-up tolerance (according to the manufacturer): 1 dB
 Separation distance: < 5 mm
 Exposure tier: general public
 Power averaging over time: not applied
 Applied determination process: Step 3 of clause 4.1.1.2

Separation distance (mm)	Channel frequency (MHz)	ERP + tolerance (dBm)	ERP + tolerance (mW)	Limit (mW)	Ratio of limit	Result
< 5	13.56	-43.51	$4.46 \cdot 10^{-5}$	413.86	$1.08 \cdot 10^{-7}$	Passed

Table 4: Result of SAR test exclusion, exposure to the head and body

EIRP is calculated using the formula of ANSI C63.10-2013 clause 9.5:

$$EIRP = E + 20\log(d) - 104.7$$

Where: EIRP = equivalent isotropically radiated power in dBm
 E = electric field strength in dBµV/m
 d = measurement distance in meters (m)

$$ERP = EIRP - 2.15 \text{ dB}$$

4.1.2 Simultaneous transmissions - SAR test exclusion, except WPT

Requirement: Part 2, § 2.1093
 Reference: KDB 447498 D04 v01

Performed by:	Jennifer Riedel B. Eng.	Date of test:	August 4, 2022
Result:	<input checked="" type="checkbox"/> Limits kept	<input type="checkbox"/> Limits not kept	

4.1.2.1 Requirements and limits

According to §2.1093(c)(2):

For multiple mobile or portable RF sources within a device operating in the same time averaging period, evaluation is required if the formula in §1.1307(b)(3)(ii)(B) of this chapter is applied to determine the exemption ratio and the result is greater than 1.

According to §1.1307(b)(3)(ii)(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 Pth, 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.

Pi = 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).

Pth,i = the exemption threshold power (Pth) according to paragraph (b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

ERPj = the ERP of fixed, mobile, or portable RF source j.

ERPth,j = 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.

Evaluatedk = 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 Limitk = 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.

4.1.2.2 Results

Note(s):

1. The SAR test exclusion ratios are taken from clause 4.1.1.3.
2. Technologies 1 and 3 or 2 and 3 can transmit simultaneously.
3. Worst case: technologies 2 and 3 transmitting simultaneously.

<i>Technology</i>	<i>SAR ratios</i>	<i>Sum of SAR ratios</i>	<i>Limit</i>	<i>Result</i>
2	$1.08 * 10^{-7}$	0.2500001	≤ 1	Passed
3	0.25			

Table 6: Result of SAR test exclusion, simultaneous transmissions

4.2 Canada

4.2.1 Frequency range 3 kHz up to 10 MHz

Requirement: RSS-102 Issue 5, section 2.5.1

Basic standard: SPR-002
IEEE C95.3

Performed by:	Jennifer Riedel B. Eng.	Date of test:	July 4, 2022
Result (Note 1):	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed	

Note(s):

- For information about measurement uncertainties see page 29.

4.2.1.1 Test configuration

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID reader / writer module	TWN4 Lepto M	2022197940	Elatec GmbH

Table 7: EUT used for testing

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID-tag	125 kHz	---	Elatec GmbH
Laptop	Lifebook A531	E001053	FUJITSU
Power supply for laptop	AC adapter	E001053	FUJITSU

Table 8: Support equipment used for testing

4.2.1.2 Mode of operation

The EUT was in continuous interrogation mode at 125 kHz.

4.2.1.3 Test equipment

Type	Designation	Manufacturer	Inventory no.
Exposure level tester with magnetic field probe 100 cm ²	ELT-400 with BN 2300/90.10	Narda Safety Test Solutions GmbH	E00276
Broadband field meter	NBM-550	Narda Safety Test Solutions GmbH	E00900
Electric field probe	EF0691	Narda Safety Test Solutions GmbH	E00902

4.2.1.4 Test setup



Picture 1: Setup of magnetic field test at a measurement distance of 0 cm



Picture 2: Setup of electric field test at a measurement distance of 0 cm

4.2.1.5 Limits

According to note 5 in section 2.5.1 of RSS-102:

Transmitters operating between 3 kHz and 10 MHz, meeting the exemption from routine SAR evaluation, shall demonstrate compliance to the instantaneous limits in section 4 of RSS-102. Therefore, these limits apply irrespective of the separation distance between the user or bystanders and the device.

According to section 4 of RSS-102:

The exposure limits in section 4 of RSS-102 are adopted from Health Canada's Safety Code 6.

According to section 2.1.1 of Safety Code 6:

Limits for internal electric field strength are intended to prevent the occurrence of nerve stimulation (NS). At frequencies between 3 kHz and 10 MHz, basic restrictions for internal electric field strength in excitable tissues as shown in table 1 of Safety Code 6 (i.e. table 2 of RSS-102) shall not be exceeded. For conditions where the determination of internal electric field strength is not possible or practical (e.g. by measurement or modelling), external unperturbed field strength assessment shall be carried out and the reference levels outlined in section 2.2 of Safety Code 6 shall be respected.

For transmitters operating between 3 kHz and 10 MHz, the requirements of table 4 and table 6 in section 4 of RSS-102 apply which are adopted from table 3 and table 4 of Safety Code 6, section 2.2:

<i>Electric Field Strength Reference Levels</i>				
<i>Frequency Range (MHz)</i>	<i>Reference Level Basis</i>	<i>Reference Level (E_{RL}), (V/m, RMS)</i>		<i>Reference Period</i>
		<i>Uncontrolled Environment</i>	<i>Controlled Environment</i>	
0.003 – 10	NS	83	170	Instantaneous (Note 1)

Table 9: Electric field strength reference levels

<i>Magnetic Field Strength Reference Levels</i>				
<i>Frequency Range (MHz)</i>	<i>Reference Level Basis</i>	<i>Reference Level (H_{RL}), (A/m, RMS)</i>		<i>Reference Period (minutes)</i>
		<i>Uncontrolled Environment</i>	<i>Controlled Environment</i>	
0.003 – 10	NS	90	180	Instantaneous (Note 1)

Table 10: Magnetic field strength reference levels

Notes:

- 1 According to note 1 of table 3 of Safety Code 6: At no point in time shall the RMS values for electric- and magnetic-fields exceed the reference levels with an instantaneous reference period in table 9 and table 10. In the case of RF fields with amplitude modulation, the RMS value during the maximum of the modulation envelope shall be compared to the reference level.

According to section 6.5 of SPR-002:

The basic restrictions are based on internal induced electric field or SAR. The relationship between the induced field and that of the exposure area is proportional; thus, in cases where the limbs are the primary point of exposure, the induced field would be less than that induced in the trunk of the human body.

When assessing compliance at the compliance distance, where limb exposure is the primary exposed condition, the following table may be used for relaxation of the RSS-102 nerve stimulation reference levels.

<i>Exposure condition</i>	<i>Relaxation factor</i>
Whole Body / Torso / Head	1.0
Leg	1.5
Arm	2.5
Hand / foot	5.0

Table 11: Limb exposure limit relaxation

A second exposure evaluation must be taken at the distance at which the trunk of the body would rest in relation to the device under test.

4.2.1.6 Test procedure

The RF exposure test is performed by the direct measurement method using a Broadband probe as described in clause 6.6.1.1 of the supplementary procedure SPR-002.

To find the worst case emissions, the field probe is moved over all sides of the EUT at the separation distances as noted in clause 4.2.1.7 while observing the display of the field meter. At the worst case position, the final value is measured and recorded.

According to section 3.2 of RSS-102, RF exposure evaluation of devices shall be made in accordance with the latest version of IEEE C95.3. Definition 3.95 in clause 3 of IEEE C95.3 specifies the separation distance applied to the measurement of electric and magnetic fields as the "distance between a source and the nearest point on the probe sensing elements".

4.2.2 SAR test exclusion, except 3 kHz – 10 MHz

Requirement: RSS-102 Issue 5, section 2.5.1

Reference: n/a

Performed by: Jennifer Riedel B. Eng. Date of test: August 4, 2022

Result: Limits kept Limits not kept

4.2.2.1 Exemption Limits for Routine Evaluation – SAR Evaluation

According RSS 102 clause 2.5.1:

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1.

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm
≤300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW
835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

⁴ The exemption limits in Table 1 are based on measurements and simulations of half-wave dipole antennas at separation distances of 5 mm to 25 mm from a flat phantom, providing a SAR value of approximately 0.4 W/kg for 1 g of tissue. For low frequencies (300 MHz to 835 MHz), the exemption limits are derived from a linear fit. For high frequencies (1900 MHz and above), the exemption limits are derived from a third order polynomial fit.

⁵ Transmitters operating between 0.003-10 MHz, meeting the exemption from routine SAR evaluation, shall demonstrate compliance to the instantaneous limits in Section 4.

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.

For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.

4.2.2.2 Results

RF technology 2:

The following data are based on applicants document: Test report 220262-AU01+W05 of the test laboratory Element Materials Technology Straubing GmbH

Application:	RFID
Operation frequency:	13.56 MHz
Antenna model	Loop antenna
Antenna connector:	none
Antenna type:	internal not detachable
Maximum field strength:	32.80 dB μ V/m at 30 m

Information related to Exposure:

Tune-up tolerance (according to the manufacturer):	1 dB
Separation distance:	< 5 mm
Exposure tier:	general public
Power averaging over time:	not applied

<i>Separation distance (mm)</i>	<i>Channel frequency (MHz)</i>	<i>EIRP + tolerance (dBm)</i>	<i>EIRP + tolerance (mW)</i>	<i>Limit 1-g SAR (mW)</i>	<i>Ratio of limit</i>	<i>Result</i>
< 5	13.56	-41.36	0.00007	71.00	$9.8 \cdot 10^{-7}$	passed

Table 14: Result of SAR test exclusion, exposure to the head and body

EIRP is calculated using the formula of ANSI C63.10-2013 clause 9.5:

$$\text{EIRP} = E + 20\log(d) - 104.7$$

Where: EIRP = equivalent isotropically radiated power in dBm
 E = electric field strength in dB μ V/m
 d = measurement distance in meters (m)

RF technology 3:

The following data are based on applicants document: Test report 220262-AU01+W07 of the test laboratory Element Materials Technology Straubing GmbH

Application:	Bluetooth low energy
Operation frequency band:	2400 MHz to 2483.5 MHz
Antenna model	Dipole antenna
Antenna connector:	none
Antenna type:	internal not detachable
Antenna gain:	2.8 dBi
Maximum conducted output power:	-2.25 dBm at 2402 MHz

Information related to Exposure:

Tune-up tolerance (according to the manufacturer):	1 dB
Separation distance:	< 5 mm
Exposure tier:	general public
Power averaging over time:	not applied

<i>Separation distance (mm)</i>	<i>Channel frequency (MHz)</i>	<i>EIRP + tolerance (dBm)</i>	<i>EIRP + tolerance (mW)</i>	<i>Limit 1-g SAR (mW)</i>	<i>Ratio of limit</i>	<i>Result</i>
< 5	2402	1.55	1.43	4.00	0.36	passed

Table 15: Result of SAR test exclusion, exposure to the head and body

4.2.3 Simultaneous transmissions SAR test exclusion, except 3 kHz – 10 MHz

Requirement: RSS-102 Issue 5, section 2.5.1

Reference: Notice 2016-DRS001
KDB 447498 D01 v06

Performed by:	Jennifer Riedel B. Eng.	Date of test:	August 4, 2022
Result:	<input checked="" type="checkbox"/> Limits kept	<input type="checkbox"/> Limits not kept	

4.2.3.1 Requirements and limit

According to Notice 2016-DRS001:

The SAR exemption limits outlined in clause 2.5.1 of RSS-102 have been derived based on an approximate SAR value of 0.4 W/kg using half-wave dipole antennas. As such, when simultaneous transmitter SAR evaluations include transmitters that have been exempt from routine SAR evaluation, the SAR must be estimating based on the ratio between the maximum tune-up tolerance limit of the transmitter that has been exempt and the exemption limit at the specific distance and frequency for that transmitter. This ratio must be multiplied by 0.4 W/kg (2.0 W/kg for controlled use and 1.0 W/kg for limb worn devices) in order to calculate the estimated SAR level.

<i>Exposure tier</i>	<i>Region of body</i>	<i>SAR exemption limit (W/kg)</i>
General public	Head and trunk	0.4
General public	Limbs	1.0
Occupational	Head and trunk	2.0
Occupational	Limbs	5.0

Table 16: SAR exemption limits

The procedure defined in Section 4.4.2 of FCC KDB 447498 D01 V06 “Area scan based 1-g SAR estimation” is now accepted by the department.

4.2.3.2 Results

Note(s):

1. The ratios are taken from clause 4.2.2.2.
2. Only technology 2 and 3 can transmit simultaneously in the frequency range above 10 MHz.
3. There are no simultaneous transmissions below 10 MHz (nerve stimulation).

Exposure tier: Head and trunk

<i>Technology</i>	<i>Ratio</i>	<i>Factor (W/kg)</i>	<i>Estimated SAR (W/kg)</i>	<i>Sum of estimated SAR (W/kg)</i>	<i>SAR exemption limit (W/kg)</i>	<i>Result</i>
2	$9.8 \cdot 10^{-7}$	1	$9.8 \cdot 10^{-7}$	0.360001	1.0	Passed
3	0.36	1	0.36			

Table 17: Result of SAR exemption, simultaneous transmissions

5 Equipment calibration status

Description	Modell number(s)	Serial number(s)	Inventory number(s)	Last calibration	Next calibration
Exposure level tester with magnetic field probe 100 cm ²	ELT-400 with BN 2300/90.10	B-0087 B-0102	E00276	2020-11	2022-11
Broadband field meter with magnetic field probe	NBM-550 with HF3061	H-0015 D-0595	E00900 E00901	2021-03	2023-03
Broadband field meter with electric field probe	NBM-550 with EF0691	H-0015 H-0318	E00900 E00902	2021-03	2023-03

6 Measurement uncertainty

Test	Frequency range	Equipment used	Expanded uncertainty	U_{Limit}	k=
Magnetic field	1 Hz – 10 kHz	ELT 400 + probe	± 28.147 %	+58.% / -37 %	2
Magnetic field	10 kHz – 400 kHz	ELT 400 + probe	± 28.147 %	+41.% / -30 %	2
H-field	300 kHz – 800 kHz	NBM 550 + HF3061	± 25.602 %	+41.% / -30 %	2
H-field	800 kHz – 1 MHz	NBM 550 + HF3061	± 25.245 %	+41.% / -30 %	2
H-field	1 MHz – 30 MHz	NBM 550 + HF3061	± 25.245 %	+41.% / -30 %	2
E-field	100 kHz – 1 MHz	NBM 550 + EF0691	± 28.467 %	+41.% / -30 %	2
E-field	1 MHz – 30 MHz	NBM 550 + EF0691	± 27.324 %	+41.% / -30 %	2
E-field	30 MHz – 1 GHz	NBM 550 + EF0691	± 27.324 %	+100.% / -50 %	2
E-field	1 GHz – 4 GHz	NBM 550 + EF0691	± 30.244 %	+100.% / -50 %	2
E-field	4 GHz – 6 GHz	NBM 550 + EF0691	± 32.150 %	+100.% / -50 %	2
Contact current	0 Hz – 110 MHz	EZ 17	+41.25 % / -29.21.%	+100.% / -50 %	2

Note(s):

1. The uncertainty stated is the expanded uncertainty obtained by multiplying the standard uncertainty by the coverage factor k. For a confidence level of 95 % the coverage factor k is 2.
2. The values of the measurement uncertainty as listed above are equal to or lower than the required ones stated in table 3 of EN 62369-1 2009 and listed as (U_{Limit}) in the table above.
3. Simple acceptance is applied as the decision rule while keeping the specified limits (U_{ETSI}) for the expanded measurement uncertainty (i.e. Test Uncertainty Ratio TUR \geq 1:1). That means, compliance is based on the recorded level by the lab irrespective of the expanded measurement uncertainty value but with a limitation to it.
4. All used test instrument as well as the test accessories are calibrated at regular intervals.

7 Revision history

<i>Revision</i>	<i>Date</i>	<i>Issued by</i>	<i>Description of modifications</i>
0	2022-08-04	Jennifer Riedel B. Eng.	First edition

Template: RF_FCC_IC_Human Exposure_V1.6

KDB 447498 D04 v01 umgestellt