

# FCC RF ExposureEvaluation

## 1. Product Information

|                       |                                                                                                      |
|-----------------------|------------------------------------------------------------------------------------------------------|
| Product Name:         | E-reader                                                                                             |
| Model/Type reference: | E701, E601, E602, E603, E605, E702, E703, E705, E706, E707, E708, E101, E102, E103, E105, E106, E107 |
| Power supply:         | DC 3.8V from battery                                                                                 |
| Hardware Version:     | E601_E701_TV1.1_20210909                                                                             |
| Software Version:     | E7_1.02                                                                                              |
| FCC ID :              | 2A33C-E701                                                                                           |
| <b>Bluetooth:</b>     |                                                                                                      |
| Version:              | Supported BR/EDR                                                                                     |
| Modulation:           | GFSK, $\pi/4$ DQPSK, 8DPSK                                                                           |
| Operation frequency:  | 2402MHz~2480MHz                                                                                      |
| Channel number:       | 79                                                                                                   |
| Channel separation:   | 1MHz                                                                                                 |
| Antenna type:         | PIFA Antenna                                                                                         |
| Antenna gain:         | 2.62 dBi                                                                                             |
| <b>Bluetooth LE</b>   |                                                                                                      |
| Supported type:       | Bluetooth Low Energy                                                                                 |
| Modulation:           | GFSK                                                                                                 |
| Operation frequency:  | 2402MHz to 2480MHz                                                                                   |
| Channel number:       | 40                                                                                                   |
| Channel separation:   | 2 MHz                                                                                                |
| Antenna type:         | PIFA Antenna                                                                                         |
| Antenna gain:         | 2.62 dBi                                                                                             |
| <b>2.4G WIFI</b>      |                                                                                                      |
| Supported type:       | 802.11b/802.11g/802.11n(H20)/802.11n(H40)                                                            |
| Modulation:           | 802.11b: DSSS<br>802.11g/802.11n(H20)/802.11n(H40): OFDM                                             |
| Operation frequency:  | 802.11b/802.11g/802.11n(H20): 2412MHz~2462MHz<br>802.11n(H40): 2422MHz~2452MHz                       |
| Channel number:       | 802.11b/802.11g/802.11n(H20): 11<br>802.11n(H40): 7                                                  |

|                      |                                                                      |                                                                       |                                                         |               |
|----------------------|----------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------|---------------|
| Channel separation:  | 5MHz                                                                 |                                                                       |                                                         |               |
| Antenna type:        | PIFA Antenna                                                         |                                                                       |                                                         |               |
| Antenna gain:        | 2.62 dBi                                                             |                                                                       |                                                         |               |
| 5G WIFI :            |                                                                      |                                                                       |                                                         |               |
| Supported type:      | 20MHz system                                                         | 40MHz system                                                          | 80MHz system                                            | 160MHz system |
|                      | 802.11a<br>802.11n<br>802.11ac                                       | 802.11n<br>802.11ac                                                   | 802.11ac                                                | N/A           |
| Operation frequency: | 5180 - 5240MHz<br>5260 - 5320MHz<br>5500 - 5700MHz<br>5745 - 5825MHz | 5190 - 5230MHz<br>5270 - 5310MHz<br>5510 - 5670MHz<br>5755MHz,5795MHz | 5210MHz;<br>5290MHz;<br>5530MHz;<br>5610MHz;<br>5775MHz | N/A           |
| Modulation:          | OFDM                                                                 | OFDM                                                                  | OFDM                                                    | N/A           |
| Channel number:      | 24                                                                   | 11                                                                    | 5                                                       | N/A           |
| Channel separation:  | 20MHz                                                                | 40MHz                                                                 | 80MHz                                                   | N/A           |
| DFS mode:            | Slave device without without radar detection                         |                                                                       |                                                         |               |
| TPC:                 | Nonsupport                                                           |                                                                       |                                                         |               |
| Antenna type:        | PIFA Antenna                                                         |                                                                       |                                                         |               |
| Antenna gain:        | 4.64 dBi                                                             |                                                                       |                                                         |               |

## 2.

### Evaluation Method and Limit

According to KDB447498 D01 General RF Exposure Guidance v06Section 4.3.1 Standalone SAR test exclusion considerations: "Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.<sup>22</sup> The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, E-readers & E-readers etc."

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

- $f$  (GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is  $\leq 50$  mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

When one of the following test exclusion conditions is satisfied for all combinations of simultaneous transmission configurations, further equipment approval is not required to incorporate transmitter modules in host devices that operate in the mixed mobile and portable host platform exposure conditions. The grantee is responsible for documenting this according to Class I permissive change requirements. Antennas that qualify for standalone SAR test exclusion must apply the estimated standalone SAR to determine simultaneous transmission test exclusion.

- a) The  $[\sum \text{ of (the highest measured or estimated SAR for each standalone antenna configuration, adjusted for maximum tune-up tolerance) / } 1.6 \text{ W/kg}] + [\sum \text{ of MPE ratios}] \leq 1.0$ .
- b) The SAR to peak location separation ratios of all simultaneously transmitting antenna pairs operating in portable device exposure conditions are all  $\leq 0.04$ , and the  $[\sum \text{ of MPE ratios}] \leq 1.0$ .

According to KDB 616217 D04 SAR for E-reader and E-readers v01r02Section 4.2E-reader host platform test requirements, When the modular approach is applied, transmitters and modules must be tested initially without using a representative host for incorporation in the display and/or keyboard of qualified E-reader computers for standalone use according to the following minimum test separation distance and antenna installation requirements. The separation distance required for incorporation in qualified hosts is described in KDB Publication 447498 D01; item e) of 4.1 and item a) of 5.2.2 etc

- a)  $\leq 25$  mm between the antenna and user for incorporation in E-reader display screens
- b)  $\leq 5$  mm between the antenna and user; only when incorporation in the keyboard compartment is required by the hosts, for bottom surface and edge exposure conditions
- c) the antennas used by the host must have been tested for equipment approval or qualify for SAR test exclusion

- d) the antenna polarization, physical orientation, rotation and installation configurations used by the host must have been tested for compliance for the required display and/or keyboard installation conditions and test separation distance(s) or qualify for SAR test exclusion
- e) When the SAR Test Exclusion Threshold in KDB Publication 447498 D01 applies, a minimum test separation distance of 25 mm is required to determine test exclusion for the display, and 5 mm for the keyboard compartment.

### 3. Refer Evaluation Method

[ANSI C95.1–1999](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

[FCC KDB publication 447498 D01 General RF Exposure Guidance v06](#): Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies.

[FCC KDB publication 616217 D04 SAR for E-reader and E-readers v01r02](#): SAR Evaluation Considerations for E-reader, Notebook, and E-reader Computers.

[FCC CFR 47 part1 1.1310](#): Radiofrequency radiation exposure limits.

[FCC CFR 47 part2 2.1093](#): Radiofrequency radiation exposure evaluation: portable devices

### 4. Conducted Power Results

#### 4.1 Test Setup Block Diagram



#### 4.2 Test Procedure

- a. The EUT was directly connected to the power meter and antenna output port as show in the block diagram Test Setup;
- b. Setup EUT work at duty cycle more than 98%;
- c. Read power sensor values in RMS detector;

#### <BT LE>

| Mode     | Channel | Frequency(MHz) | Peak Conducted Output Power (dBm) |
|----------|---------|----------------|-----------------------------------|
| GFSK(1M) | 0       | 2402           | 1.38                              |
|          | 19      | 2441           | 2.37                              |
|          | 39      | 2480           | 2.70                              |

#### <BT Classics>

| Mode          | Channel | Frequency(MHz) | Peak Conducted Output Power (dBm) |
|---------------|---------|----------------|-----------------------------------|
| GFSK          | 0       | 2402           | 3.91                              |
|               | 39      | 2440           | 4.81                              |
|               | 78      | 2480           | 5.19                              |
| $\pi/4$ DQPSK | 0       | 2402           | 3.77                              |
|               | 39      | 2440           | 4.69                              |
|               | 78      | 2480           | 5.14                              |
| 8DPSK         | 0       | 2402           | 4.31                              |
|               | 39      | 2440           | 5.29                              |
|               | 78      | 2480           | 5.79                              |

**<2.4G WLAN>**

| Mode              | Channel | Frequency(MHz) | Peak Conducted Output Power (dBm) |
|-------------------|---------|----------------|-----------------------------------|
| IEEE 802.11b      | 1       | 2412           | 4.45                              |
|                   | 6       | 2437           | 3.87                              |
|                   | 11      | 2462           | 3.84                              |
| IEEE 802.11g      | 1       | 2412           | 4.49                              |
|                   | 6       | 2437           | 4.20                              |
|                   | 11      | 2462           | 4.00                              |
| IEEE 802.11n HT20 | 1       | 2412           | 4.30                              |
|                   | 6       | 2437           | 3.90                              |
|                   | 11      | 2462           | 3.77                              |
| IEEE 802.11n HT40 | 3       | 2422           | 4.14                              |
|                   | 6       | 2437           | 3.94                              |
|                   | 9       | 2452           | 2.29                              |

**<5G WIFI>**

| Test Mode     | Channel | Frequency (MHz) | Measured Output Power (dBm) |
|---------------|---------|-----------------|-----------------------------|
| 802.11a       | 36      | 5180            | 3.36                        |
|               | 40      | 5200            | 4.06                        |
|               | 48      | 5240            | 4.76                        |
|               | 52      | 5260            | 4.33                        |
|               | 60      | 5300            | 4.34                        |
|               | 64      | 5320            | 3.98                        |
|               | 100     | 5500            | 4.04                        |
|               | 116     | 5580            | 5.50                        |
|               | 120     | 5600            | 5.85                        |
|               | 140     | 5700            | 4.38                        |
|               | 149     | 5745            | 3.17                        |
|               | 157     | 5785            | 2.94                        |
|               | 165     | 5825            | 3.36                        |
| 802.11n(HT20) | 36      | 5180            | 3.38                        |
|               | 40      | 5200            | 4.01                        |
|               | 48      | 5240            | 4.61                        |
|               | 52      | 5260            | 3.89                        |
|               | 60      | 5300            | 4.01                        |
|               | 64      | 5320            | 3.58                        |
|               | 100     | 5500            | 3.72                        |
|               | 116     | 5580            | 5.06                        |
|               | 120     | 5600            | 5.36                        |
|               | 140     | 5700            | 3.90                        |
|               | 149     | 5745            | 4.32                        |
|               | 157     | 5785            | 4.04                        |
|               | 165     | 5825            | 4.49                        |
| 802.11n(HT40) | 38      | 5190            | 4.04                        |
|               | 46      | 5230            | 4.54                        |
|               | 54      | 5270            | 4.17                        |

|                 |     |      |      |
|-----------------|-----|------|------|
|                 | 62  | 5310 | 3.98 |
|                 | 102 | 5510 | 3.97 |
|                 | 110 | 5550 | 4.53 |
|                 | 118 | 5590 | 5.54 |
|                 | 164 | 5670 | 4.12 |
|                 | 151 | 5755 | 3.18 |
|                 | 159 | 5795 | 3.34 |
| 802.11ac(VHT20) | 36  | 5180 | 3.45 |
|                 | 40  | 5200 | 4.22 |
|                 | 48  | 5240 | 4.94 |
|                 | 52  | 5260 | 4.38 |
|                 | 60  | 5300 | 4.49 |
|                 | 64  | 5320 | 4.04 |
|                 | 100 | 5500 | 3.61 |
|                 | 116 | 5580 | 5.04 |
|                 | 120 | 5600 | 5.34 |
|                 | 140 | 5700 | 4.06 |
|                 | 149 | 5745 | 4.31 |
|                 | 157 | 5785 | 4.21 |
|                 | 165 | 5825 | 4.60 |
| 802.11ac(VHT40) | 38  | 5190 | 3.86 |
|                 | 46  | 5230 | 4.78 |
|                 | 54  | 5270 | 4.38 |
|                 | 62  | 5310 | 4.36 |
|                 | 102 | 5510 | 4.07 |
|                 | 110 | 5550 | 4.50 |
|                 | 118 | 5590 | 5.61 |
|                 | 164 | 5670 | 3.89 |
|                 | 151 | 5755 | 4.26 |
|                 | 159 | 5795 | 3.83 |
| 802.11ac(VHT80) | 42  | 5210 | 3.47 |
|                 | 58  | 5290 | 4.07 |
|                 | 106 | 5530 | 4.47 |
|                 | 122 | 5610 | 2.64 |
|                 | 155 | 5775 | 4.46 |

## 5. Standalone Evaluation

| Band/Mode         | f<br>(GHz) | Antenna<br>Distance<br>(mm) | RF output power |      | SAR Test Exclusion<br>Threshold | SAR Test<br>Exclusion |
|-------------------|------------|-----------------------------|-----------------|------|---------------------------------|-----------------------|
|                   |            |                             | dBm             | mW   |                                 |                       |
| GFSK – BT LE      | 2.480      | 5                           | 2.70            | 1.86 | 0.5865< 3.0                     | Yes                   |
| GFSK              | 2.480      | 5                           | 5.19            | 3.30 | 1.0405< 3.0                     | Yes                   |
| $\pi/4$ DQPSK     | 2.480      | 5                           | 5.14            | 3.27 | 1.0286< 3.0                     | Yes                   |
| 8DPSK             | 2.480      | 5                           | 5.79            | 3.79 | 1.1947< 3.0                     | Yes                   |
| IEEE 802.11b      | 2.412      | 5                           | 4.45            | 2.79 | 0.8654< 3.0                     | Yes                   |
| IEEE 802.11g      | 2.412      | 5                           | 4.49            | 2.81 | 0.8734< 3.0                     | Yes                   |
| IEEE 802.11n HT20 | 2.412      | 5                           | 4.30            | 2.69 | 0.8360< 3.0                     | Yes                   |
| IEEE 802.11n HT40 | 2.422      | 5                           | 4.14            | 2.59 | 0.8058< 3.0                     | Yes                   |
| 802.11a           | 5.600      | 5                           | 5.85            | 3.85 | 1.8220< 3.0                     | Yes                   |
| 802.11n(HT20)     | 5.600      | 5                           | 5.36            | 3.44 | 1.6260< 3.0                     | Yes                   |
| 802.11n(HT40)     | 5.590      | 5                           | 5.54            | 3.58 | 1.6933< 3.0                     | Yes                   |
| 802.11ac(VHT20)   | 5.600      | 5                           | 5.34            | 3.42 | 1.6185< 3.0                     | Yes                   |
| 802.11ac(VHT40)   | 5.590      | 5                           | 5.61            | 3.64 | 1.7208< 3.0                     | Yes                   |
| 802.11ac(VHT80)   | 5.530      | 5                           | 4.47            | 2.80 | 1.3164< 3.0                     | Yes                   |

*Remark:*

*1. Output power including tune up tolerance;*

*2. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to f) in section 4.1 is applied to determine SAR test exclusion.*

### 5.1 Simultaneous Transmission for SAR Exclusion

The sample support one BT/WLAN modular and share same antenna, BT and WLAN can be active at the same time, but only with interleaving of packages switched on board level. That means that they don't transmit at the same time. No need consider simultaneous transmission;

## 5. Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1093 for the uncontrolled RF Exposure and SAR Exclusion Threshold per KDB 447498 v06.

.....THE END OF REPORT.....