

**Shenzhen Global Test Service Co.,Ltd.**

No.7-101 and 8A-104, Building 7 and 8, DCC Cultural and Creative Garden, No.98, Pingxin North Road, Shangmugu Community, Pinghu Street, Longgang District, Shenzhen, Guangdong

RF Exposure evaluation**Report Reference No.**..... : **GTS20211014007-1-2****FCC ID**..... : **2A3ET-REEVO**

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Date of issue.....: Oct.25, 2021

Representative Laboratory Name : **Shenzhen Global Test Service Co.,Ltd.**

Address.....: No.7-101 and 8A-104, Building 7 and 8, DCC Cultural and Creative Garden, No.98, Pingxin North Road, Shangmugu Community, Pinghu Street, Longgang District, Shenzhen, Guangdong, China

Applicant's name.....: **Beno, Inc.**

Address.....: 651 N Broad St, Middletown, 19709, New Castle Delaware United States of America.

Test specification..... :**47CFR §1.1310**Standard.....: **47CFR §2.1093****KDB447498 D01 General RF Exposure Guidance v06**

TRF Originator.....: Shenzhen Global Test Service Co.,Ltd.

Master TRF.....: Dated 2014-12

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Test item description..... : **Bicycle with Electric Drive (Pedelec)**

Trade Mark.....: Beno

Manufacturer.....: Voltron Malaysia Sdn. Bhd.

Model/Type reference.....: Reevo

Listed Models.....: N/A

Exposure category.....: General population/uncontrolled environment

EUT Type.....: Portable

Hardware Version.....: N/A

Software Version.....: N/A

Rating.....: DC 48.0V by Battery

Result.....: **PASS**

TEST REPORT

Test Report No. : GTS20211014007-1-2	Oct.25, 2021 Date of issue
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Equipment under Test : Bicycle with Electric Drive (Pedelec)

Model /Type : Reevo

Listed model : N/A

Applicant : **Beno, Inc.**

Address : 651 N Broad St, Middletown, 19709, New Castle Delaware United States of America.

Manufacturer : **Voltron Malaysia Sdn. Bhd.**

Address : A 15, Jalan Fairuz 9/2, Taman Perusahaan Ringan Bakar Arang, 08000 Sungai Petani, Kedah

Test Result:	PASS
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The test report merely corresponds to the test sample.

It is not permitted to copy extracts of these test result without the written permission of the test laboratory.

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1. SUMMARY

1.1. EUT configuration

The following peripheral devices and interface cables were connected during the measurement:

● - supplied by the manufacturer

○ - supplied by the lab

○	Adapter	Length (m) :	0.4m
		Shield :	Non-Shielded
		Detachable :	Non- Detachable

1.2. Product Description

Product Name	Bicycle with Electric Drive (Pedelec)
Trade Mark	Beno
Model/Type reference	Reevo
List Models	N/A
Model Declaration	N/A
Power supply:	DC 48.0V by Battery
Sample ID	GTS20211014007-1-1#& GTS20211014007-1-2#
Bluetooth	
Operation frequency	2402-2480MHz
Channel Number	40 channels for Bluetooth (DTS)
Channel Spacing	2MHz for Bluetooth (DTS)
Modulation Type	GFSK for Bluetooth (DTS)
Antenna Description	Internal Antenna, 0dBi(Max.) for 2.4G Band

2. TEST ENVIRONMENT

2.1. Address of the test laboratory

Shenzhen Global Test Service Co.,Ltd.

No.7-101 and 8A-104, Building 7 and 8, DCC Cultural and Creative Garden, No.98, Pingxin North Road, Shangmugu Community, Pinghu Street, Longgang District, Shenzhen, Guangdong,China

2.2. Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

CNAS (No. CNAS L8169)

Shenzhen Global Test Service Co., Ltd. has been assessed and proved to be in compliance with CNAS-CL01 Accreditation Criteria for Testing and Calibration Laboratories (identical to ISO/IEC 17025: 2019 General Requirements) for the Competence of Testing and Calibration Laboratories.

A2LA (Certificate No. 4758.01)

Shenzhen Global Test Service Co., Ltd. has been assessed by the American Association for Laboratory Accreditation (A2LA). Certificate No. 4758.01.

Industry Canada Registration Number. is 24189.

FCC Designation Number is CN1234.

FCC Registered Test Site Number is165725.

2.3. Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

Temperature:	15-35 ° C
Humidity:	30-60 %
Atmospheric pressure:	950-1050mbar

2.4. Statement of the measurement uncertainty

The data and results referenced in this document are true and accurate. The reader is cautioned that there may be errors within the calibration limits of the equipment and facilities. The measurement uncertainty was calculated for all measurements listed in this test report acc. to TR-100028-01” Electromagnetic compatibility and Radio spectrum Matters (ERM);Uncertainties in the measurement of mobile radio equipment characteristics; Part 1” and TR-100028-02 “Electromagnetic compatibility and Radio spectrum Matters (ERM);Uncertainties in the measurement of mobile radio equipment characteristics; Part 2 “ and is documented in the Shenzhen Global Test Service Co.,Ltd quality system acc. to DIN EN ISO/IEC 17025. Furthermore, component and process variability of devices similar to that tested may result in additional deviation. The manufacturer has the sole responsibility of continued compliance of the device.

Hereafter the best measurement capability for Shenzhen GTS laboratory is reported:

Test Items	Measurement Uncertainty	Notes
Transmitter power conducted	0.57 dB	(1)

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

3. Method of measurement

3.1. Applicable Standard

[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 KDB447498 D01 General RF Exposure Guidance v06](#): Mobile and Portable Device, RF Exposure, Equipment Authorization Procedures.

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

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

3.2. Evaluation Method and Limit

According to KDB447498 D01 General RF Exposure Guidance v06 Section 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. 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, laptops & tablets etc.”

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [f \text{ (GHz)}] \leq 3.0$$
 for 1-g SAR and ≤ 7.5 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 ≤ 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 f) 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. The $[\sum \text{ of (the highest measured or estimated SAR for each standalone antenna configuration, adjusted for maximum tune-up tolerance) } / 1.6 \text{ W/kg}] + [\sum \text{ of MPE ratios}] \leq 1.0$.

The SAR to peak location separation ratios of all simultaneously transmitting antenna pairs operating in portable device exposure conditions are all ≤ 0.04 , and the $[\sum \text{ of MPE ratios}] \leq 1.0$.

4. Conducted Power Results

Bluetooth(BT)

Mode	Channel	Frequency (MHz)	Peak Conducted Output Power (dBm)
GFSK	0	2402	2.56
	19	2440	2.89
	39	2480	4.34

5. Manufacturing Tolerance

Bluetooth(BT)

GFSK (Peak)			
Channel	Channel 0	Channel 19	Channel 39
Target (dBm)	2.0	2.0	4.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

6. Evaluation Results

6.1. Standalone Evaluation

Bluetooth(BT)

Band/Mode	f (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
			dBm	mW		
GFSK(BLE)	2.480	5	5.00	3.1623	0.99 < 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 of KDB447498 D01 General RF Exposure Guidance v06 is applied to determine SAR test exclusion.

7. Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1093 for the uncontrolled RF Exposure and SAR Exclusion Threshold per KDB447498 D01 General RF Exposure Guidance v06, No SAR is required.

.....End of Report.....