

**FCC - TEST REPORT**Report Number : **60.790.20.080.01R02** Date of Issue : December 22, 2020Model : **ROUND FREEDOM MICRO II HS**Product Type : **Merchandise Theft Deterrent System**Applicant : Mobile Technologies Inc.Address : 1050 NE 67th Ave, Hillsboro, OR 97124, United States Of AmericaProduction Facility : Hualun Technology Co., LtdAddress : 3F., N. 82-4, Dongshun St., Shulin District, New Taipei City 238, Taiwan.Test Result : ☒ **Positive** ☐ **Negative**Total pages  
including  
Appendices : 23

*TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch is a subcontractor to TÜV SÜD Product Service GmbH according to the principles outlined in ISO 17025.*

*TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch reports apply only to the specific samples tested under stated test conditions. Construction of the actual test samples has been documented. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. The manufacturer/importer is responsible to the Competent Authorities in Europe for any modifications made to the production units which result in non-compliance to the relevant regulations. TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch shall have no liability for any deductions, inferences or generalizations drawn by the client or others from TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch issued reports.*

*This report is the confidential property of the client. As a mutual protection to our clients, the public and ourselves, extracts from the test report shall not be reproduced except in full without our written approval*

# 1 Table of Contents

|                                                        |    |
|--------------------------------------------------------|----|
| 1 Table of Contents .....                              | 2  |
| 2 Description of Equipment Under Test.....             | 3  |
| 3 Summary of Test Standards .....                      | 4  |
| 4 Details about the Test Laboratory .....              | 5  |
| 4.1 Test Equipment Site List .....                     | 6  |
| 4.2 Measurement System Uncertainty .....               | 7  |
| 5 Summary of Test Results .....                        | 8  |
| 6 General Remarks .....                                | 9  |
| 7 Test Setups .....                                    | 10 |
| 7.1 Radiated test setups 9kHz-30MHz.....               | 10 |
| 7.2 Radiated test setups 30MHz-1GHz.....               | 10 |
| 7.3 Radiated test setups Above 1GHz .....              | 10 |
| 7.4 AC Power Line Conducted Emission test setups ..... | 11 |
| 7.5 Conducted RF test setups.....                      | 11 |
| 8 Emission Test Results .....                          | 12 |
| 8.1 Spurious Radiated Emission .....                   | 12 |
| 8.2 Conducted Emission at AC Power Line .....          | 15 |
| 8.3 6dB & 99% Bandwidth .....                          | 17 |
| 9 Test setup procedure.....                            | 18 |
| 10 Appendix A - General Product Information.....       | 22 |

## 2 Description of Equipment Under Test

### Description of the Equipment Under Test

Product: Merchandise Theft Deterrent System

Model no.: ROUND FREEDOM MICRO II HS

FCC ID: 2AA2X-15000282

Rating: Adapter Model:W&T-AD36W059350F  
 Input: AC100-240V. 1.0A  
 Output: DC 5.9V, 3.5A

Main unit input: DC 5.9V, 3.5A  
 Main unit outout(USB type-C):DC5.2V, 3.0A

Internal rechargeable battery: DC3.7V, type LIR2302H

Frequency: 125kHz (Tx and Rx)

Modulation: AM

#### Auxiliary Equipment Used during Test:

| DESCRIPTION | MANUFACTURER | MODEL NO. | REMARK                |
|-------------|--------------|-----------|-----------------------|
| User Card   | MTI          | /         | Provided by applicant |

#### Auxiliary Software Used during Test:

| DESCRIPTION | SOFTWARE NAME | VERSION | REMARK |
|-------------|---------------|---------|--------|
| /           | /             | /       | /      |

### 3 Summary of Test Standards

| Test Standards                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| FCC Part 15 Subpart C 10-1-20 Edition<br>Federal Communications Commission, PART 15 — Radio Frequency Devices,<br>Subpart C — Unintentional Radiators |

All the tests were performed using the procedures from ANSI C63.4(2014) and ANSI C63.10 (2013).

## 4 Details about the Test Laboratory

### Site 1

Company name: TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch  
Building 12&13 Zhiheng Wisdomland Business Park,  
Nantou Checkpoint Road 2,  
Shenzhen 518052, P.R.China  
FCC Registration Number: 514049  
ISED test site number: 10320A

| Emission Tests                                              |           |
|-------------------------------------------------------------|-----------|
| Test Item                                                   | Test Site |
| <b>FCC Part 15 Subpart C</b>                                |           |
| FCC Title 47 Part 15.205, 15.209 Spurious Radiated Emission | Site 1    |
| FCC Title 47 Part 15.207 Conduct Emission                   | Site 1    |
| FCC Title 47 Part 15.215 20dB & 99%Bandwidth                | Site 1    |

## 4.1 Test Equipment Site List

### Radiated emission Test – Site 1

| DESCRIPTION                         | MANUFACTURER    | MODEL NO.         | SERIAL NO.      | CAL. DUE DATE |
|-------------------------------------|-----------------|-------------------|-----------------|---------------|
| EMI Test Receiver                   | Rohde & Schwarz | ESR 26            | 101269          | 2021-6-29     |
| Signal Analyzer                     | Rohde & Schwarz | FSV40             | 101031          | 2021-6-22     |
| Loop Antenna                        | Rohde & Schwarz | HFH2-Z2           | 100398          | 2021-7-7      |
| Trilog Super Broadband Test Antenna | Schwarzbeck     | VULB 9163         | 707             | 2021-8-4      |
| Horn Antenna                        | Rohde & Schwarz | HF907             | 102294          | 2021-7-5      |
| Wideband Horn Antenna               | Q-PAR           | QWH-SL-18-40-K-SG | 12827           | 2021-6-21     |
| Pre-amplifier                       | Rohde & Schwarz | SCU 18            | 102230          | 2021-6-21     |
| Pre-amplifier                       | Rohde & Schwarz | SCU 40A           | 100432          | 2021-7-30     |
| Attenuator                          | Agilent         | 8491A             | MY39264334      | 2021-6-21     |
| 3m Semi-anechoic chamber            | TDK             | 9X6X6             | ----            | 2022-10-28    |
| Test software                       | Rohde & Schwarz | EMC32             | Version 9.15.00 | N/A           |

### Conducted Emission Test – Site 1

| DESCRIPTION        | MANUFACTURER      | MODEL NO.      | SERIAL NO.     | CAL. DUE DATE |
|--------------------|-------------------|----------------|----------------|---------------|
| EMI Test Receiver  | Rohde & Schwarz   | ESR 3          | 101782         | 2021-6-29     |
| LISN               | Rohde & Schwarz   | ENV4200        | 100249         | 2021-6-12     |
| LISN               | Rohde & Schwarz   | ENV432         | 101318         | 2021-6-12     |
| LISN               | Rohde & Schwarz   | ENV216         | 100326         | 2021-6-12     |
| LISN               | Rohde & Schwarz   | ENV216         | 102472         | 2021-6-12     |
| ISN                | Rohde & Schwarz   | ENY81          | 100177         | 2021-6-12     |
| ISN                | Rohde & Schwarz   | ENY81-CA6      | 101664         | 2021-6-12     |
| High Voltage Probe | Schwarzbeck       | TK9420(VT9420) | 9420-584       | 2021-6-23     |
| RF Current Probe   | Rohde & Schwarz   | EZ-17          | 100816         | 2021-6-28     |
| Attenuator         | Shanghai Huaxiang | TS2-26-3       | 080928189      | 2021-6-21     |
| Test software      | Rohde & Schwarz   | EMC32          | Version9.15.00 | N/A           |
| Shielding Room     | TDK               | CSR #1         | ----           | 2020-11-07    |

### 20dB & 99% Bandwidth, Peak Output Power, Spurious Emissions at Antenna Terminals, 100kHz Bandwidth of band edges, Power Spectral Density – Site 1

| DESCRIPTION      | MANUFACTURER    | MODEL NO.       | SERIAL NO.    | CAL. DUE DATE |
|------------------|-----------------|-----------------|---------------|---------------|
| Signal Analyzer  | Rohde & Schwarz | FSV40           | 101030        | 2021-6-21     |
| RF Switch Module | Rohde & Schwarz | OSP120/OSP-B157 | 101226/100851 | 2021-6-21     |

## 4.2 Measurement System Uncertainty

### Measurement System Uncertainty Emissions

| System Measurement Uncertainty                                      |                                          |
|---------------------------------------------------------------------|------------------------------------------|
| Items                                                               | Extended Uncertainty                     |
| Uncertainty for Radiated Emission in 3m chamber<br>9kHz-30MHz       | 4.76dB                                   |
| Uncertainty for Radiated Emission in 3m chamber<br>30MHz-1000MHz    | Horizontal: 5.12dB;<br>Vertical: 5.10dB; |
| Uncertainty for Radiated Emission in 3m chamber<br>1000MHz-25000MHz | Horizontal: 5.01dB;<br>Vertical: 5.00dB; |
| Uncertainty for Conducted Emission at AC Power Line<br>150kHz-30MHz | 3.21dB                                   |
| Uncertainty for conducted power test                                | 1.16dB                                   |
| Uncertainty for frequency test                                      | $0.6 \times 10^{-7}$                     |

## 5 Summary of Test Results

| Emission Tests                                              |       |                                     |                          |                          |
|-------------------------------------------------------------|-------|-------------------------------------|--------------------------|--------------------------|
| FCC Part 15 Subpart C                                       |       |                                     |                          |                          |
| Test Condition                                              | Pages | Test Result                         |                          |                          |
|                                                             |       | Pass                                | Fail                     | N/A                      |
| FCC Title 47 Part 15.205, 15.209 Spurious Radiated Emission | 12-14 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| FCC Title 47 Part 15.207 Conduct Emission                   | 15-16 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| FCC Title 47 Part 15.215 20dB & 99% Bandwidth               | 17    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## 6 General Remarks

### Remarks

This submittal(s) (test report) is intended for **FCC ID: 2AA2X-15000282**, complies with Section 15.205, 15.207, 15.209, 15.215 of the FCC Part 15, Subpart C rules for the DCD grant.

The TX and RX frequency range is 125kHz.

The 3.7V battery is a backup in case the product is removed from its AC/DC adapter. Normally the product is fixed and connected to the adapter, therefore, all RF test results on this report are based on this case with the adapter. However, we have checked the result on 3.7V, no obvious difference.

### SUMMARY:

- All tests according to the regulations cited on page 8 were

■ - Performed

□ - **Not** Performed

- The Equipment Under Test

■ - **Fulfills** the general approval requirements.

□ - **Does not** fulfill the general approval requirements.

Sample Received Date: November 9, 2020

Testing Start Date: November 13, 2020

Testing End Date: December 22, 2020

- TÜV SÜD Certification and Testing (China) Co., Ltd. Shenzhen Branch -

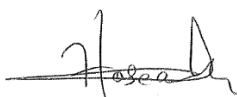
Reviewed by:

Prepared by:

Tested by:



Eric LI  
EMC Project Manager



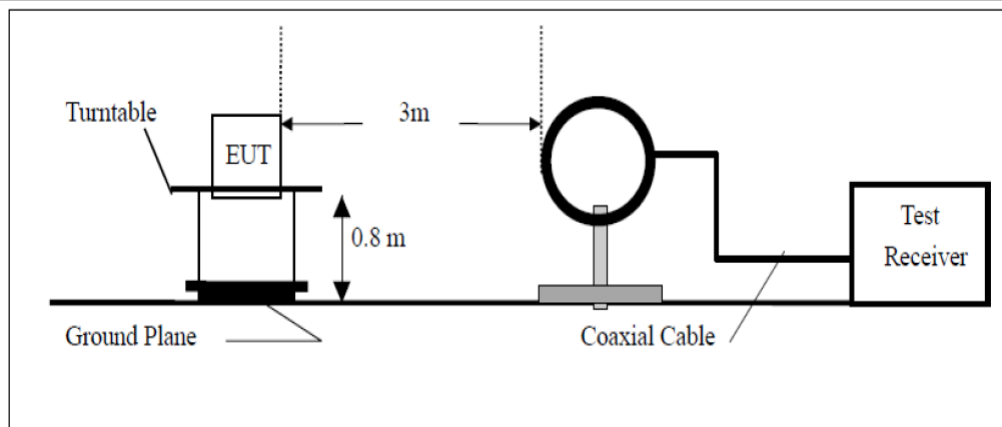
Hosea CHAN  
EMC Project Engineer



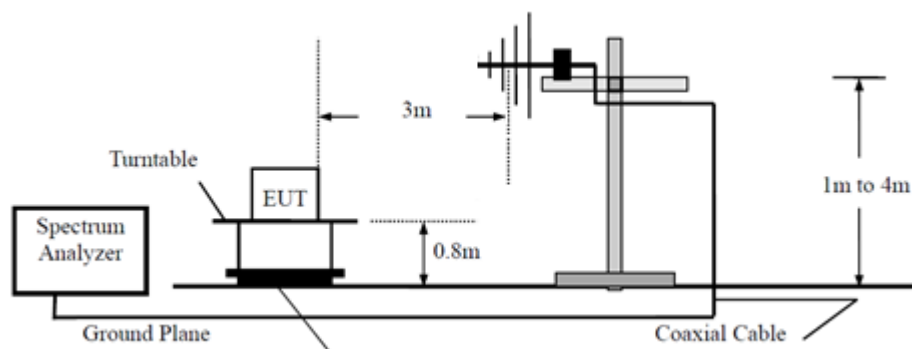
Louise Liu  
EMC Test Engineer

## 7 Test Setups

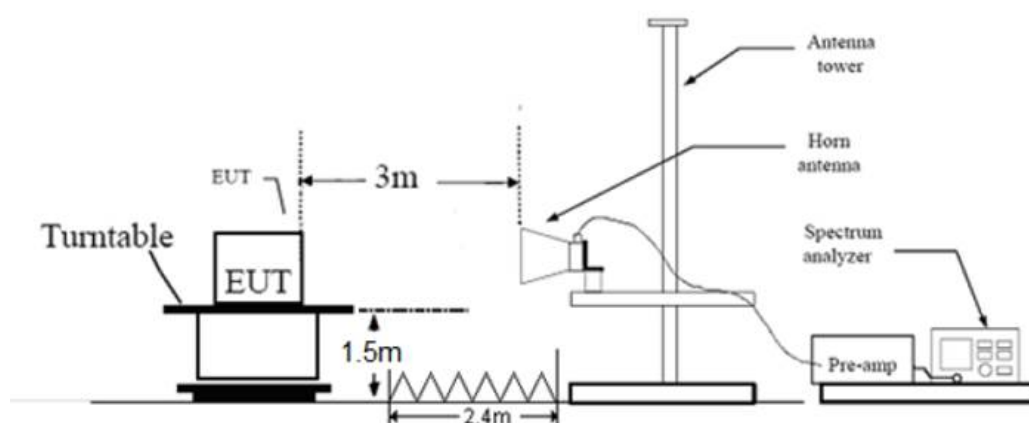
### 7.1 Radiated test setups 9kHz-30MHz



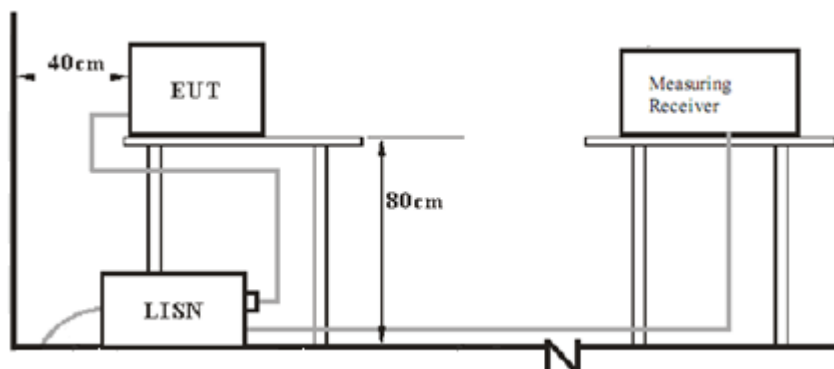
### 7.2 Radiated test setups 30MHz-1GHz



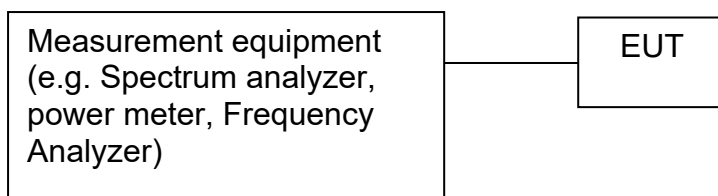
### 7.3 Radiated test setups Above 1GHz



## 7.4 AC Power Line Conducted Emission test setups



## 7.5 Conducted RF test setups



## 8 Emission Test Results

### 8.1 Spurious Radiated Emission

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: Operated, TX Mode  
 Test Specification: FCC15.205, 15.209  
 Comment: 120V AC  
 Remark: 9kHz to 30MHz

|                                     |            |
|-------------------------------------|------------|
| Test Result                         |            |
| <input checked="" type="checkbox"/> | Passed     |
| <input type="checkbox"/>            | Not Passed |

| Frequency<br>MHz | Result<br>dBμV/m | Limit<br>dBμV/m | Over Limit<br>dB | Detector<br>PK/QP/AV | Corr.<br>(dB) | RSE. or Fund.     |
|------------------|------------------|-----------------|------------------|----------------------|---------------|-------------------|
| 0.009000         | 59.31            | 128.52          | -69.21           | Peak                 | 20.03         | Spurious emission |
| 0.023993         | 58.46            | 120.00          | -61.54           | Peak                 | 19.72         | Spurious emission |
| 0.039973         | 54.32            | 115.57          | -61.25           | Peak                 | 19.69         | Spurious emission |
| 0.056000         | 51.56            | 112.64          | -61.08           | Peak                 | 19.70         | Spurious emission |
| 0.071980         | 49.79            | 110.46          | -60.67           | Peak                 | 19.69         | Spurious emission |
| 0.088007         | 48.08            | 108.71          | -60.63           | Peak                 | 19.69         | Spurious emission |
| 0.103987         | 47.40            | 107.26          | -59.86           | Peak                 | 19.69         | Spurious emission |
| 0.120014         | 46.30            | 106.02          | -59.72           | Peak                 | 19.68         | Spurious emission |
| 0.125000         | 64.19            | 105.67          | -41.48           | Peak                 | 19.67         | Fundamental       |
| 0.135994         | 45.32            | 104.93          | -59.61           | Peak                 | 19.66         | Spurious emission |
| 0.980825         | 33.12            | 67.79           | -34.67           | Peak                 | 19.66         | Spurious emission |
| 2.866350         | 35.81            | 69.50           | -33.69           | Peak                 | 19.73         | Spurious emission |

Remark:

- According to C63.10, if the peak measured value complies with the quasi-peak limit, it is unnecessary to perform a quasi-peak measurement, so quasi-peak emission value did not show in data table if the peak value complies with quasi-peak limit.
- Consequence Level=Reading Level + Correction Factor  
 Above 1GHz: Corrector factor = Antenna Factor + Cable Loss- Amplifier Gain  
 Below 1GHz: Corrector factor = Antenna Factor + Cable Loss  
 (The Reading Level is recorded by software which is not shown in the sheet)
- The testing was performed at 3m distance, the limit has been transferred from 300m/30m to 3m.

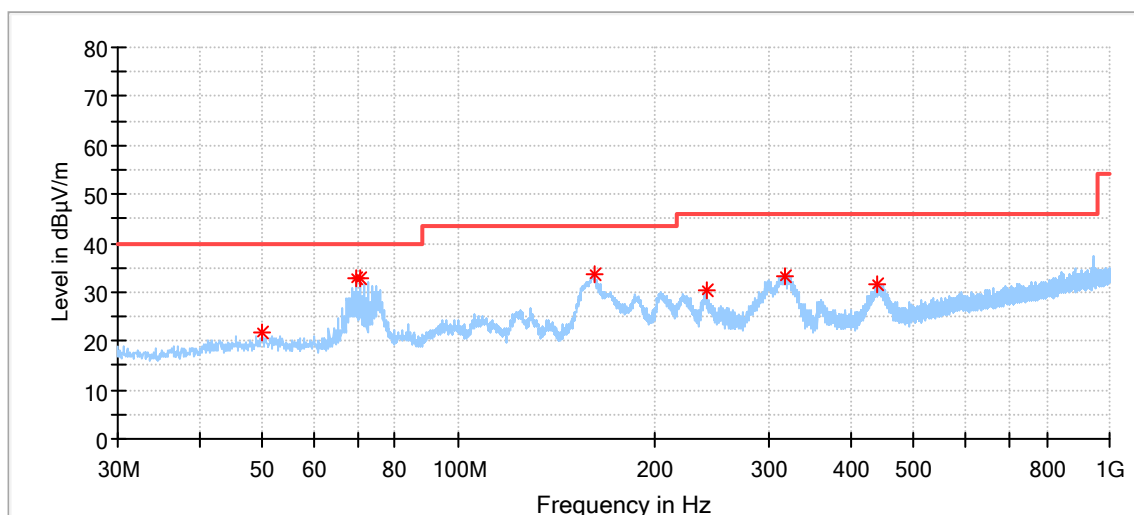
## Spurious Radiated Emission

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: Operated, TX Mode  
 Test Specification: FCC15.205, 15.209  
 Comment: 120V AC  
 Remark: 30MHz to 1GHz, Antenna: Horizontal

Test Result

☒ Passed

☐ Not Passed



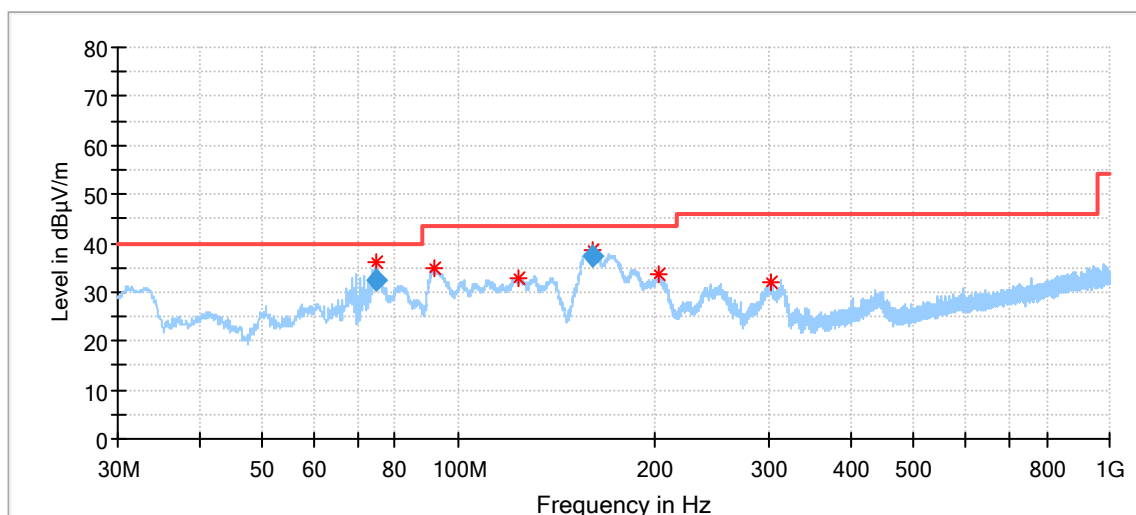
| Frequency (MHz) | MaxPeak (dBμV/m) | Limit (dBμV/m) | Over Limit (dB) | Corr. (dB) |
|-----------------|------------------|----------------|-----------------|------------|
| 50.046667       | 21.83            | 40.00          | -18.17          | 15.26      |
| 69.608333       | 32.96            | 40.00          | -7.04           | 11.08      |
| 70.632222       | 33.01            | 40.00          | -6.99           | 10.78      |
| 161.381111      | 33.64            | 43.50          | -9.86           | 9.82       |
| 240.274444      | 30.25            | 46.00          | -15.75          | 13.48      |
| 316.581111      | 33.25            | 46.00          | -12.75          | 15.22      |
| 440.956667      | 31.68            | 46.00          | -14.32          | 18.17      |

## Spurious Radiated Emission

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: Operated, TX Mode  
 Test Specification: FCC15.205, 15.209  
 Comment: 120V AC  
 Remark: 30MHz to 1GHz, Antenna: Vertical

### Test Result

☒ Passed

☐ Not Passed


| Frequency (MHz) | MaxPeak (dBμV/m) | Limit (dBμV/m) | Over Limit (dB) | Corr. (dB) |
|-----------------|------------------|----------------|-----------------|------------|
| 74.835556       | 35.99            | 40.00          | -4.01           | 9.48       |
| 92.026111       | 34.72            | 43.50          | -8.78           | 11.20      |
| 123.766667      | 32.64            | 43.50          | -10.86          | 10.31      |
| 160.518889      | 38.69            | 43.50          | -4.81           | 9.78       |
| 202.713889      | 33.79            | 43.50          | -9.71           | 12.73      |
| 302.354444      | 32.09            | 46.00          | -13.91          | 14.81      |

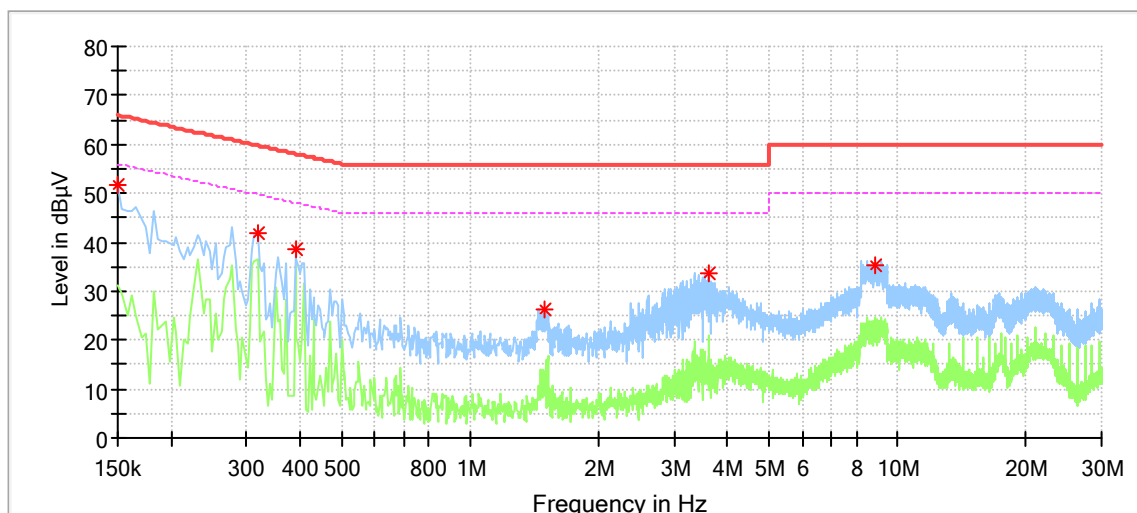
## 8.2 Conducted Emission at AC Power Line

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: 125kHz Working and charging battery  
 Test Specification: AC Mains, L Line  
 Comment: 120V AC, 60Hz

Test Result

☒ Passed

☐ Not Passed



| Frequency (MHz) | MaxPeak (dBμV) | Average (dBμV) | Limit (dBμV) | Margin (dB) |
|-----------------|----------------|----------------|--------------|-------------|
| 0.150000        | 51.67          | ---            | 66.00        | -14.33      |
| 0.318000        | 42.03          | ---            | 59.76        | -17.73      |
| 0.390000        | 38.68          | ---            | 58.06        | -19.38      |
| 1.486000        | 26.15          | ---            | 56.00        | -29.85      |
| 3.618000        | 33.51          | ---            | 56.00        | -22.49      |
| 8.874000        | 35.47          | ---            | 60.00        | -24.53      |

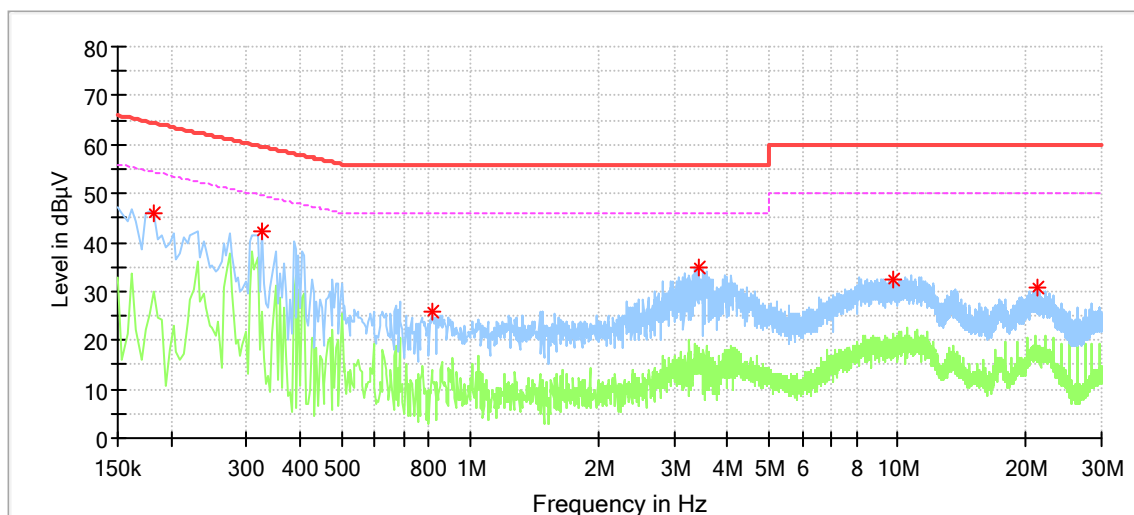
## Conducted Emission Test

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: 125kHz Working and charging battery  
 Test Specification: AC Mains, N Line  
 Comment: 120V AC, 60Hz

Test Result

☒ Passed

☐ Not Passed

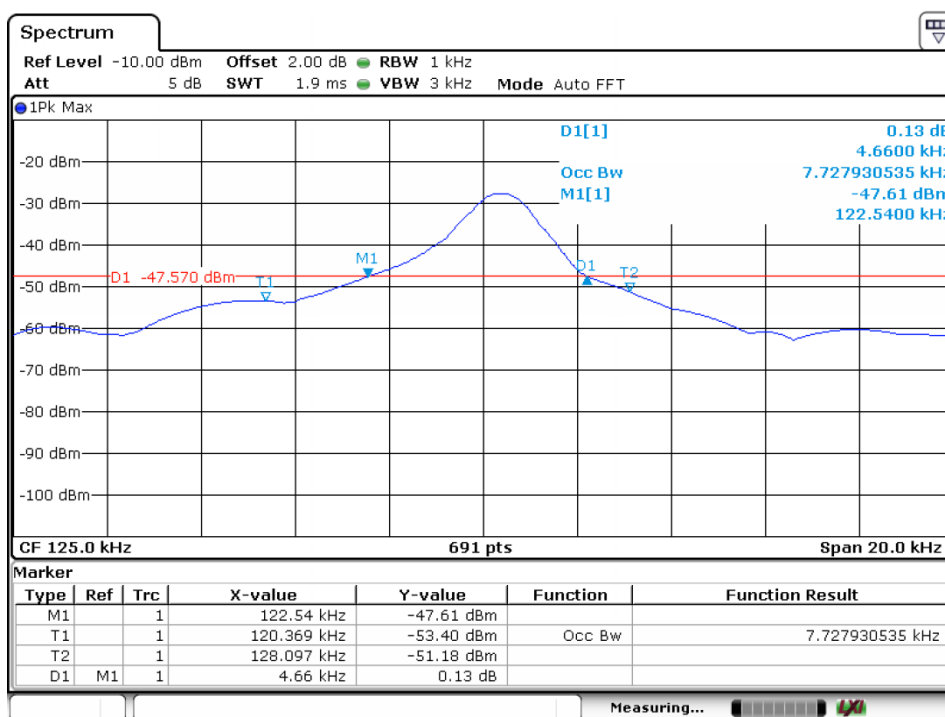


| Frequency (MHz) | MaxPeak (dBμV) | Average (dBμV) | Limit (dBμV) | Margin (dB) |
|-----------------|----------------|----------------|--------------|-------------|
| 0.182000        | 45.93          | ---            | 64.39        | -18.47      |
| 0.326000        | 42.26          | ---            | 59.55        | -17.29      |
| 0.814000        | 25.76          | ---            | 56.00        | -30.24      |
| 3.442000        | 35.02          | ---            | 56.00        | -20.98      |
| 9.758000        | 32.34          | ---            | 60.00        | -27.66      |
| 21.222000       | 30.81          | ---            | 60.00        | -29.19      |

### 8.3 6dB & 99% Bandwidth

EUT: ROUND FREEDOM MICRO II HS  
 Op Condition: Operated, TX Mode  
 Test Specification: FCC15.215, 20dB Bandwidth  
 Comment: 120V AC

Test Result

☒ Passed☐ Not Passed

Date: 24.NOV.2020 15:39:54

| Bandwidth      | Measured Value |
|----------------|----------------|
| 20dB bandwidth | 4.7 kHz        |
| 99% bandwidth  | 7.7 kHz        |

## 9 Test setup procedure

### 9.1 Field strength of emissions and Restricted bands

#### Test Method

- 1: The EUT was placed on a turn table which is 1.5m above ground plane for above 1GHz and 0.8m above ground for below 1GHz at 3-meter chamber room for test. The table was rotated 360 degrees to determine the position of the highest radiation.
- 2: The EUT was set 3 meters away from the interference – receiving antenna, which was mounted on the top of a variable – height antenna tower.
- 3: The height of antenna is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are set to make the measurement.
- 4: For each suspected emission, the EUT was arranged to its worst case and then the antenna was tuned to heights from 1 meter to 4 meters and the rotatable table was turned from 0 degrees to 360 degrees to find the maximum reading.
- 5: Use the following spectrum analyzer settings According to C63.10:

#### For Above 1GHz

Span = wide enough to capture the peak level of the in-band emission and all spurious  
RBW = 1MHz, VBW $\geq$ 3RBW, Sweep = auto, Detector function = peak and average,  
Trace = max hold.

#### For Below 1GHz

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the in-band emission and all spurious  
RBW = 120KHz, VBW $\geq$ 3RBW, Sweep = auto, Detector function = QP,  
Trace = max hold.

**Field strength of emissions and Restricted bands****Limits**

According to §15.209 (a), the field strength of emissions from intentional radiators shall not exceed the field strength levels specified in the following table:

| Fundamental frequency (MHz) | Field strength (microvolts/meter) | Field strength of harmonics (microvolts/meter) |
|-----------------------------|-----------------------------------|------------------------------------------------|
| 0.009-0.490                 | 2400/F(kHz)                       | 300                                            |
| 0.490-1.705                 | 24000/F(kHz)                      | 30                                             |
| 1.705-30.0                  | 30                                | 30                                             |
| 30-88                       | 100                               | 3                                              |
| 88-216                      | 150                               | 3                                              |
| 216-960                     | 200                               | 3                                              |
| Above 960                   | 500                               | 3                                              |

## 9.2 Conducted Emission at AC Power line

### Test Method

1. The EUT was placed on a table, which is 0.8m above ground plane
2. The power line of the EUT is connected to the AC mains through a Artificial Mains Network (A.M.N.).
3. Maximum procedure was performed to ensure EUT compliance
4. A EMI test receiver is used to test the emissions from both sides of AC line

### Limit

| Frequency<br>MHz | QP Limit<br>dB $\mu$ V | AV Limit<br>dB $\mu$ V |
|------------------|------------------------|------------------------|
| 0.150-0.500      | 66-56*                 | 56-46*                 |
| 0.500-5          | 56                     | 46                     |
| 5-30             | 60                     | 50                     |

\*Decreasing linearly with logarithm of the frequency.

### 9.3 20dB & 99% Bandwidth

#### Test Method

1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
2. Position the EUT without connection to spectrum analyser. Turn on the EUT and connect it to measurement instrument. Then set it to any one convenient frequency within its operating range. Set a reference level on the measuring instrument equal to the highest peak value.
3. Measure the frequency difference of two frequencies that were attenuated 20dB from the reference level. Record the frequency difference as the emission bandwidth.

#### Limits:

According to 15.215 (c) Intentional radiators operating under the alternative provisions to the general emission limits, as contained in §§ 15.217 through 15.257 and in Subpart E of this part, must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

## 10 Appendix A - General Product Information

### Radiofrequency radiation exposure evaluation

This exposure evaluation is intended for **FCC ID: 2AA2X-15000282**.

According to KDB 447498 D01v06 section 4.3.1, For frequencies below 100 MHz and test separation distances  $\leq 50$  mm, the Numeric threshold is determined as:

Step a)

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

Step b)

$\{[\text{Power allowed at numeric threshold for 50mm in step a)}] + [(\text{test separation distance} - 50\text{mm}) \cdot (f(\text{MHz})/150)]\}$   
mW

Step c) 1)

For test separation distances  $> 50\text{mm}$  and  $< 200\text{mm}$ , the power threshold at the corresponding test separation distance at 100MHz in step b) is multiplied by  $[1 + \log(100/f(\text{MHz}))]$

Step c) 2)

For test separation distances  $\leq 50\text{mm}$ , the power threshold determined by the equation in c) 1) for 50mm and 100MHz is multiplied by  $\frac{1}{2}$ .

>> The fundamental frequency of the EUT is 125kHz, the test separation distance is  $\leq 50\text{mm}$ .  
(Manufacturer specified the separation distance is: 20mm)

Step a)

>> Numeric threshold, mW / 50mm  $\cdot \sqrt{0.1\text{GHz}} \leq 3.0$   
Numeric threshold  $\leq 474.3\text{mW}$

Step b)

>> Numeric threshold  $\leq 474.3\text{mW} + (50\text{mm}-50\text{mm}) \cdot 100\text{MHz}/150)$   
Numeric threshold  $\leq 474.3\text{mW}$

Step c) 1) & c) 2)

>> Numeric threshold  $\leq 474.3\text{mW} \cdot [1 + \log 100/100\text{MHz}] \cdot \frac{1}{2}$   
Numeric threshold  $\leq 237.15\text{mW}$

>> The power (calculated power + tune up tolerance) of EUT at 125kHz is: 0.0008mW  
Which is smaller than the Numeric threshold.  
Therefore, the device is exempt from stand-alone SAR test requirements.

## Appendix A

Power calculation (According to C63.10 chapter 9.5)

|                                                          | Value  | Unit                     |
|----------------------------------------------------------|--------|--------------------------|
| Field Strength Measured (E)                              | 64.19  | $\text{dB}\mu\text{V/m}$ |
| Measurement Distance (D)                                 | 3      | m                        |
| Equivalent Isotropically Radiated Power (E.I.R.P in dBm) | -30.97 | dBm                      |
| Equivalent Isotropically Radiated Power (E.I.R.P in mW)  | 0.0008 | mW                       |

Remark:  $\text{EIRP} = E + 20\log(D) - 104.7$

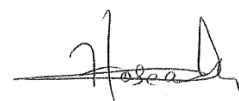
(EIRP is in dBm, E is in  $\text{dB}\mu\text{V/m}$ , D is in meters)

Reviewed by:



Eric LI  
EMC Project Manager

Prepared by:

Hosea CHAN  
EMC Project Engineer