



# SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 1 of 11

## 1 Cover Page

### ***RF Exposure Evaluation Report***

**Application No.:** SHCR2507001807AT  
**FCC ID:** 2AGOFRC421A  
**Applicant:** HCS (Suzhou) Limited  
**Address of Applicant:** 19F-20F, Building B-3rd, No.209 Zhuyuan Road, New District, Suzhou, 215011, China  
**Manufacturer:** HCS (Suzhou) Limited  
**Address of Manufacturer:** 19F-20F, Building B-3rd, No.209 Zhuyuan Road, New District, Suzhou, 215011, China  
**Equipment Under Test (EUT):**  
**EUT Name:** Remote Control  
**Model No.:** RC4213801/02BR, RC4213401/02BR, RC4213402/02BR, RC4213403/02BR, Babylon RCU, RC421XXXX/XXR, RC421XXXX/XXBR ("X"=0-9, "B" means packed with battery)  
**Standard(s) :** FCC Rules 47 CFR §2.1093  
KDB 447498 D04 interim General RF Exposure Guidance v01  
**Date of Receipt:** 2025-07-09  
**Date of Test:** 2025-07-16 to 2025-07-29  
**Date of Issue:** 2025-08-01

<b>Test Result:</b>	<b>Pass*</b>
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\* In the configuration tested, the EUT complied with the standards specified above.

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Unless otherwise stated the results shown in this test report refer only to the sample(s) tested and such sample(s) are retained for 30 days only.

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SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 2 of 11

Revision Record			
Version	Description	Date	Remark
00	Original	2025-08-01	/

Authorized for issue by:			
Tested By		Bill Wu	
		Bill Wu/Project Engineer	
Approved By		Parlam Zhan	
		Parlam Zhan/Reviewer	



**SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.**

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 3 of 11

**2 Contents**

	Page
<b>1 Cover Page</b>	<b>1</b>
<b>2 Contents</b>	<b>3</b>
<b>3 General Information</b>	<b>4</b>
3.1 General Description of E.U.T.	4
3.1 Details of E.U.T.	4
3.2 Separation Distance	5
3.3 Test Location	6
3.4 Test Facility	6
<b>4 FCC Radiofrequency radiation exposure limits</b>	<b>7</b>
4.1 Blanket 1 mW Blanket Exemption	7
4.2 MPE-based Exemption	7
4.3 SAR-based Exemption	8
<b>5 Measurement and Calculation</b>	<b>10</b>
5.1 Maximum transmit power	10
5.2 RF Exposure Calculation	10



## SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 4 of 11

### 3 General Information

#### 3.1 General Description of E.U.T.

Power supply:	DC 3V by 2*AAA size batteries
Product Type:	<input checked="" type="checkbox"/> Portable device
	<input type="checkbox"/> Mobile device
	<input type="checkbox"/> Fixed device

#### 3.1 Details of E.U.T.

##### BLE

Operation Frequency:	2402MHz to 2480MHz
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Antenna Type:	PCB Antenna
Antenna Gain:	-0.38dBi (Provided by the manufacturer)

##### Zigbee

Operation Frequency:	2405MHz to 2480MHz
Modulation Type:	O-QPSK
Number of Channels:	16
Channel Spacing:	5MHz
Antenna Type:	PCB Antenna
Antenna Gain:	-0.38dBi (Provided by the manufacturer)



## SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 5 of 11

### 3.2 Separation Distance

Separation distance between the antenna to person (R):	<5mm
Remark: This 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. R has been stated in user manual.	

### 3.3 Test Location

All tests were performed at:

Compliance Certification Services (Kunshan) Inc.

No.10 Weiye Rd, Innovation park, Eco&Tec, Development Zone, Kunshan City, Jiangsu, China.

Tel: +86 512 5735 5888 Fax: +86 512 5737 0818

Note:

1. SGS is not responsible for wrong test results due to incorrect information (e.g., max. internal working frequency, antenna gain, cable loss, etc) is provided by the applicant. (If applicable).
2. SGS is not responsible for the authenticity, integrity and the validity of the conclusion based on results of the data provided by applicant. (If applicable).
3. Sample source: sent by customer.

### 3.4 Test Facility

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

• **A2LA**

Compliance Certification Services (Kunshan) Inc. is accredited by the American Association for Laboratory Accreditation (A2LA). Certificate No. 2541.01.

• **FCC**

Compliance Certification Services (Kunshan) Inc. has been recognized as an accredited testing laboratory. Designation Number: CN1172.

• **ISED**

Compliance Certification Services (Kunshan) Inc. has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory. Company Number: 2324E

• **VCCI**

The 3m and 10m Semi-anechoic chamber and Shielded Room of Compliance Certification Services (Kunshan) Inc. has been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-20134, R-11600, C-11707, T-11499, G-10216 respectively.

## 4 FCC Radiofrequency radiation exposure limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

### 4.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

### 4.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

**Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation**

RF Source Frequency			Minimum Distance			Threshold ERP
$f_L$ MHz		$f_H$ MHz	$\lambda_L / 2\pi$		$\lambda_H / 2\pi$	W
0.3	–	1.34	159 m	–	35.6 m	1,920 R <sup>2</sup>
1.34	–	30	35.6 m	–	1.6 m	3,450 R <sup>2</sup> /f <sup>2</sup>
30	–	300	1.6 m	–	159 mm	3.83 R <sup>2</sup>
300	–	1,500	159 mm	–	31.8 mm	0.0128 R <sup>2</sup> f
1,500	–	100,000	31.8 mm	–	0.5 mm	19.2R <sup>2</sup>
Subscripts L and H are low and high; $\lambda$ is wavelength. From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.						

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least  $\lambda/2\pi$ . The thresholds are based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary if the ERP of the device is greater than  $ERP_{20cm}$  in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases} \quad (\text{B.1})$$

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only if the physical dimensions of the radiating structure(s) do not exceed the electrical length of  $\lambda/4$  or if the antenna gain is less than that of a half-wave dipole.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

Limit calculation			
Frequency range	Frequency(MHz)	$R(\lambda/2\pi)$ (m)	Threshold ERP(W)
1500~100000MHz	<b>2480</b>	0.0193	0.007

## 4.3 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of  $\lambda/4$ .

As for devices with antennas of length greater than  $\lambda/4$  where the gain is not well defined, but always less than that of a half-wave dipole (length  $\lambda/2$ ), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known. The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold  $P_{th}$  (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive).  $P_{th}$  is given by Formula (B.2).

Furthermore, consistently with typical use conditions and with the conservative character of the SAR test exemptions, the power thresholds considered at 0.5 cm are applicable to all distances from 0 cm to 0.5 cm.

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}}(d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B.2})$$

where





# SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 9 of 11

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

and *f* is in GHz, *d* is the separation distance (cm), and *ERP*<sub>20cm</sub> is per Formula (B.1)

Example values shown in Table B.2 are for illustration only.

**Table B.2—Example Power Thresholds (mW)**

Frequency (MHz)	Distance(mm)									
	5	10	15	20	25	30	35	40	45	50
300	39	65	88	110	129	148	166	184	201	217
450	22	44	67	89	112	135	158	180	203	226
835	9	25	44	66	90	116	145	175	207	240
1900	3	12	26	44	66	92	122	157	195	236
2450	3	10	22	38	59	83	111	143	179	219
3600	2	8	18	32	49	71	96	125	158	195
5800	1	6	14	25	40	58	80	106	136	169

Limit calculation					
Position	Frequency range(GHz)	Frequency(GHz)	X	Distance(cm)	Pth (mW)
Extremity	1.5~6	<b>2.48</b>	1.905	<b>0.5</b>	<b>2.717</b>

## 5 Measurement and Calculation

### 5.1 Maximum transmit power

The Power Data is based on the RF Test Report SHCR250700180701, SHCR250700180702

#### BLE

Test Mode	Test Frequency (MHz)	Power (dBm)	Power (mW)
1M	2402	3.84	2.42
	2440	4.13	2.59
	2480	4.23	2.65
2M	2402	3.97	2.49
	2440	4.15	2.60
	2480	4.25	2.66

#### Zigbee

Test Mode	Test Frequency (MHz)	Power (dBm)	Power (mW)
Zigbee	2405	3.92	2.47
	2440	4.17	2.61
	2480	4.26	2.67

### 5.2 RF Exposure Calculation

For BLE:

The Max Conducted Output Power is 2.66mW ,The best case gain is -0.38dBi.

-0.38dBi logarithmic terms convert to numeric result is nearly 0.92

According to the formula. calculate the power test result:

Max Power =2.66mW

**Remark:** we used the maximum power between the conducted power or ERP to perform RF exposure exemption evaluation.

	Evaluation method	Separation distance between the antenna to person (R)	Exempt Limit(mW)	Verdict
<input type="checkbox"/>	Blanket 1 mW Blanket Exemption	No distance requirement	1mW	N/A
<input type="checkbox"/>	MPE-based Exemption(ERP)	$(\lambda / 2\pi ) \leq R$	7mW(ERP)	N/A
<input checked="" type="checkbox"/>	SAR-based Exemption( $P_{th}$ ) -Extremity	$0.5cm \leq R \leq 40cm$	2.717mW	Yes



## SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd.

SHEM-TRF-001 Rev. 02 Sep01, 2023

Report No.: SHCR250700180703

Page: 11 of 11

For Zigbee:

The Max Conducted Output Power is 2.67mW ,The best case gain is -0.38dBi.

-0.38dBi logarithmic terms convert to numeric result is nearly 0.92

According to the formula. calculate the power test result:

Max Power =2.67mW

**Remark:** we used the maximum power between the conducted power or ERP to perform RF exposure exemption evaluation.

	Evaluation method	Separation distance between the antenna to person (R)	Exempt Limit(mW)	Verdict
<input type="checkbox"/>	Blanket 1 mW Blanket Exemption	No distance requirement	1mW	N/A
<input type="checkbox"/>	MPE-based Exemption(ERP)	$(\lambda / 2\pi ) \leq R$	7mW(ERP)	N/A
<input checked="" type="checkbox"/>	SAR-based Exemption( $P_{th}$ ) -Extremity	$0.5cm \leq R \leq 40cm$	2.717mW	Yes

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report.

--End of the Report--