

SAR TEST EXCLUSION EVALUATION REPORT

Product Name: RGB Speaker
Trade Mark: GEMS, deal Worthy, heyday, Chug Inc.
Model No.: BTSP15
Report Number: 25051717928RFC-2
Test Standards: FCC 47 CFR Part 2.1093
FCC ID: 2AO23-BTSP15
Test Result: PASS
Date of Issue: June 3, 2025

Prepared for:

Chug, Inc.

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Prepared by:

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UTTR-RF-FCCPART1-V1.1

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1. GENERAL INFORMATION

1.1 CLIENT INFORMATION

Applicant:	Chug, Inc.
Address of Applicant:	7157 Shady Oak Rd, Eden Prairie MN 55344, United States
Manufacturer 1:	Hunan XuanTong Technology Co., Ltd.
Address of Manufacturer 1:	B2 Building, Standard Factory, Caojiapeng Four Phases, Baofeng Street, Shimen County, Changde City, Hunan Province, China
Manufacturer 2:	Rocker Technology Co., Ltd.
Address of Manufacturer 2:	Building S3, 2nd Floor, Area A, Star Maiya Innovation Science and Technology Park, Prey Roka Village, Chok Chheu Neang Commune, Ang Snoul District, National Road 4, Kandal Province, Phnom Penh, Cambodia

1.2 EUT INFORMATION

Product Name:	RGB Speaker	
Model No.:	BTSP15	
Trade Mark:	GEMS, deal Worthy, heyday, Chug Inc.	
DUT Stage:	Identical Prototype	
EUT Supports Function: (Provided by the customer)	2.4 GHz ISM Band:	Bluetooth 5.3
Sample Received Date:	May 12, 2025	

Remark: The above EUT's information was provided by customer. Please refer to the specifications or user's manual for more detailed description.

1.3 PRODUCT SPECIFICATION SUBJECTIVE TO THIS STANDARD

For BT_EDR	
Frequency Band:	2400 MHz to 2483.5 MHz
Frequency Range:	2402 MHz to 2480 MHz
Bluetooth Version:	Bluetooth BR + EDR
Modulation Technique:	Frequency Hopping Spread Spectrum(FHSS)
Type of Modulation:	GFSK, $\pi/4$ DQPSK, 8DPSK
Number of Channels:	79
Channel Separation:	1 MHz
Antenna Type:	PCB Antenna
Antenna Gain: (Provided by the customer)	0.31 dBi
Maximum Conducted Peak Power:	-5.18 dBm

1.4 OTHER INFORMATION

Test channels for BT_EDR				
Mode	Tx/Rx Frequency	Test RF Channel Lists		
		Lowest(L)	Middle(M)	Highest(H)
GFSK (DH1, DH3, DH5)	2402 MHz to 2480 MHz	Channel 0	Channel 39	Channel 78
		2402 MHz	2441 MHz	2480 MHz
π /4DQPSK (DH1, DH3, DH5)	2402 MHz to 2480 MHz	Channel 0	Channel 39	Channel 78
		2402 MHz	2441 MHz	2480 MHz
8DPSK (DH1, DH3, DH5)	2402 MHz to 2480 MHz	Channel 0	Channel 39	Channel 78
		2402 MHz	2441 MHz	2480 MHz

1.5 GENERAL DESCRIPTION OF APPLIED STANDARDS

The EUT is a RF product, according to the specifications of the manufacturers. It must comply with the requirements of the following standards:

FCC 47 CFR Part 2.1093

All test items have been performed and recorded as per the above standards

1.6 DEVIATION FROM STANDARDS

None.

1.7 ABNORMALITIES FROM STANDARD CONDITIONS

None.

1.8 OTHER INFORMATION REQUESTED BY THE CUSTOMER

None.

2. EQUIPMENT LIST

Please refer to the RF test report.

3. SAR TEST EXCLUSION EVALUATION

3.1 REFERENCE DOCUMENTS FOR EVALUATION

No.	Identity	Document Title
1	FCC 47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices.
2	KDB 447498 D04 Interim General RF Exposure Guidance v01	RF EXPOSURE PROCEDURES AND EQUIPMENT AUTHORIZATION POLICIES FOR MOBILE AND PORTABLE DEVICES

3.2 EXEMPTION LIMITS FOR ROUTINE EVALUATION – SAR EVALUATION

3.2.1 SAR Test Exclusion Threshold

3.2.1.1 KDB 447498 D04

According to KDB 447498 D04, 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.

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.

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).

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

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

where

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

f is in GHz, d is the separation distance (cm), and $ERP_{20 \text{ cm}}$ is per Formula (B.1).

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

3.2.2 Test Procedure

Software provided by client enabled the EUT to transmit and receive data at lowest, middle and highest channel individually.

3.3 MPE CALCULATION RESULTS

Note: For the test results, the EUT had been tested with all conditions. But only the worst case was shown in test report.

3.3.1 For BT

For BR+EDR function, operating at 2402MHz to 2480 MHz for GFSK, $\pi/4$ DQPSK, 8DPSK

3.3.1.1 Antenna Type:

PCB Antenna

3.3.1.2 Antenna Gain:

2402MHz to 2480 MHz: 0.31 dBi

3.3.1.3 Results for FCC 47 CFR Part 2.1093

Operating Mode	Frequency	Tune-up Power (conducted average)	Tolerance	Antenna Gain	Calculated maximum conducted average		Separation Distance	SAR Test Exclusion Threshold
	(MHz)	(dBm)	(dBm)	(dBi)	(dBm)	(mW)	(mm)	(mW)
BR+EDR	2402-2480	-7	1.0	0.31	-6.69	0.2	5	3

So the transmitter complies with the RF exposure requirements and the SAR is not required.

APPENDIX 1 PHOTOS OF TEST SETUP

N/A

APPENDIX 2 PHOTOS OF EUT CONSTRUCTIONAL DETAILS

Refer to Appendix 2 for EUT external and internal Photos.

*** End of Report ***

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