



SAR Evaluation Report

Application No.:	SZEM1908017747CR(SGS SZ No.:T51910270079EM)
Applicant:	Kubo Robotics ApS
Address of Applicant:	Niels Bohrs Alle 185, Odense SOE, 5220 Denmark
Manufacturer:	Kubo Robotics ApS
Address of Manufacturer:	Niels Bohrs Alle 185, Odense SOE, 5220 Denmark
Factory:	Micro Technic A/S
Address of Factory:	Smedevænget 5, 5560, Aarup, Denmark
Buyer / Supplier:	KUBO Robotics ApS
Equipment Under Test (EUT):	
EUT Name:	Robot consisting of separate head and body with RFID based coding titles
Model No.:	KUBO20
Requested Age Grading:	4-10
Country of Destination:	US
FCC ID:	2AOWV-KUBO-20
Standards:	47 CFR Part 1.1307 47 CFR Part 2.1093 KDB447498D01 General RF Exposure Guidance v06
Date of Receipt:	2019-08-21
Date of Test:	2019-08-27 to 2019-10-18
Date of Issue:	2019-10-23
Test Result :	PASS*

* In the configuration tested, the EUT complied with the standards specified above.

Keny Xu
EMC Laboratory Manager



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2 Version

Revision Record				
Version	Chapter	Date	Modifier	Remark
01		2019-10-23		Original

Authorized for issue by:			
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4 General Information

4.1 General Description of EUT

Power supply:	Rechargeable battery DC3.7V, 800mAh, Charged by DC5V
For BLE	
Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	BLE V5.0
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Antenna Type:	Internal
Antenna Gain:	0.5dBi
For RFID	
Operation Frequency:	13.56MHz
Modulation Type:	ASK
Number of Channels	1
Antenna Type	Loop Antenna
Antenna Gain:	0dBi

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4.2 Test Location

All tests were performed at:

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No. 1 Workshop, M-10, Middle section, Science & Technology Park, Shenzhen, Guangdong, China
518057
Telephone: +86 (0) 755 2601 2053 Fax: +86 (0) 755 2671 0594
No tests were sub-contracted.

4.3 Test Facility

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

- **CNAS (No. CNAS L2929)**

CNAS has accredited SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch EMC Lab to ISO/IEC 17025:2005 General Requirements for the Competence of Testing and Calibration Laboratories (CNAS-CL01 Accreditation Criteria for the Competence of Testing and Calibration Laboratories) for the competence in the field of testing.

- **A2LA (Certificate No. 3816.01)**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

- **VCCI**

The 3m Fully-anechoic chamber for above 1GHz, 10m Semi-anechoic chamber for below 1GHz, Shielded Room for Mains Port Conducted Interference Measurement and Telecommunication Port Conducted Interference Measurement of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-20026, R-14188, C-12383 and T-11153 respectively.

- **FCC –Designation Number: CN1178**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1178. Test Firm Registration Number: 406779.

- **Innovation, Science and Economic Development Canada**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006.

IC#: 4620C.

4.4 Deviation from Standards

None.

4.5 Abnormalities from Standard Conditions

None.

4.6 Other Information Requested by the Customer

None.

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5 SAR Evaluation

5.1 RF Exposure Compliance Requirement

5.1.1 Standard Requirement

According to KDB447498D01 General RF Exposure Guidance v06

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 Exclusion Threshold condition, listed below, is satisfied.

5.1.2 Limits

Standalone SAR test exclusion considerations

- The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances

≤ 50 mm are determined by:

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

$f(\text{GHz})$ 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

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 is applied to determine SAR test exclusion

- For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following (also illustrated in Appendix B):
 - $\{[\text{Power allowed at numeric threshold for 50 mm in step a}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$ mW, for 100 MHz to 1500 MHz
 - $\{[\text{Power allowed at numeric threshold for 50 mm in step a}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$ mW, for > 1500 MHz and ≤ 6 GHz
- For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):
 - For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100/f(\text{MHz}))]$
 - For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$
- SAR measurement procedures are not established below 100 MHz.

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Simultaneous transmission SAR test exclusion considerations

b) When an antenna qualifies for the standalone SAR test exclusion of 4.3.1 and also transmits simultaneously with other antennas, the standalone SAR value must be estimated according to the following to determine the simultaneous transmission SAR test exclusion criteria:³⁶

- 1) $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})/x}] \text{ W/kg}$, for *test separation distances* $\leq 50 \text{ mm}$;
where $x = 7.5$ for 1-g SAR and $x = 18.75$ for 10-g SAR.
- 2) 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the *test separation distance* is $> 50 \text{ mm}$.³⁷

5.1.3 EUT RF Exposure

For BLE:

The Max. power (including tune-up tolerance) is -2.18 dBm on the lowest channel 2.402 GHz (*).
-2.18 dBm logarithmic terms convert to numeric result is nearly 0.61 mW

According to the formula. calculate the test exclusion thresholds:

$$\text{General RF Exposure} = \frac{(\text{Max. Power of channel, including tune-up tolerance, mW}) * \sqrt{f(\text{GHz})}}{(\text{min. test separation distance, mm})}$$

$$\text{General RF Exposure} = (0.61 \text{ mW} / 5 \text{ mm}) * \sqrt{2.402 \text{ GHz}} = 0.19 \quad (1)$$

SAR requirement:

$$S = 3.0 \quad (2)$$

$$(1) < (2)$$

So the SAR report is not required.

(*) Max. power refer to Report No.:SZEM190801774702

- End of the Report -



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