



SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

SZEMC-TRF-01 Rev. A/1

Report No.: SZCR250100024203

Page: 1 of 12

RF EXPOSURE EVALUATION REPORT

Application No.: SZCR2501000242AT
Applicant: Acsys International Limited
Address of Applicant: 22nd Floor, Tai Yua Building, 181 Johnston Road, Wanchai, Hong Kong
Manufacturer: Gusuo Intelligence Limited (Shenzhen)
Address of Manufacturer: D605-3, Silver Star Tech Bldg., 1301 Guanguang Rd., Xinlan Community, Guanlan Street, Longhua District, Shenzhen, Guangdong, China
Equipment Under Test (EUT):
EUT Name: PL5 PADLOCK – BLUETOOTH
Model No.: PL5BLE
Trade Mark: ACSYS
FCC ID: 2AR93-116P2503
Standard(s) : FCC Rules 47 CFR §2.1093
KDB 447498 D04 interim General RF Exposure Guidance v01
Date of Receipt: 2025-01-15
Date of Evaluation: 2025-01-18 to 2025-05-07
Date of Issue: 2025-05-09

Evaluation Result:

Pass*

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

Kenx. Xu

Kenx Xu
EMC Laboratory Manager



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgs.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

SZEMC-TRF-01 Rev. A/1

Report No.: SZCR250100024203

Page: 2 of 12

Revision Record				
Version	Chapter	Date	Modifier	Remark
01		2025-05-12		Original

Authorized for issue by:				
		Gebin Sun		
		Gebin Sun/Project Engineer		
		Eric Fu		
		Eric Fu/Reviewer		



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing & Calibration Laboratory

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgs.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

2 Contents

	Page
1 Cover Page	1
2 Contents	3
3 General Information	4
3.1 General Description of E.U.T.	4
3.2 Details of E.U.T.	4
3.3 Separation Distance	4
3.4 Test Location	5
3.5 Test Facility	5
3.6 Deviation from Standards	5
3.7 Abnormalities from Standard Conditions	5
4 FCC Radiofrequency radiation exposure limits	6
4.1 Blanket 1 mW Blanket Exemption	6
4.2 MPE-based Exemption	6
4.3 SAR-based Exemption	7
5 Measurement and Calculation	11
5.1 Maximum transmit power	11
5.2 RF Exposure Calculation	11
6 EUT Constructional Details (EUT Photos)	12



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing & Calibration Laboratory

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgs.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

3 General Information

3.1 General Description of E.U.T.

Product Type:	☒ Portable device
	☐ Mobile device
	☐ Fixed device

3.2 Details of E.U.T.

Power supply:	3V DC(3V x 1 CR2 battery) Input: DC5V via USB Type C port
Operation Frequency:	2402MHz to 2480MHz
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Data Rate:	Support 1Mb/s
Antenna Type:	SMD Antenna
Antenna Gain:	2.13dBi

Remark: The information in this section is provided by the applicant or manufacturer, SGS is not liable to the accuracy, suitability, reliability or/and integrity of the information.

3.3 Separation Distance

Minimum test separation distance:	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.	

3.4 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen Branch

No. 1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China. 518057.

Tel: +86 755 2601 2053 Fax: +86 755 2671 0594

No tests were sub-contracted.

3.5 Test Facility

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

• 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 (Member No. 1937)

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. Shenzhen EMC laboratory 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: CN1336

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

Designation Number: CN1336. Test Firm Registration Number: 787754.

• 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.

3.6 Deviation from Standards

None

3.7 Abnormalities from Standard Conditions

None



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch EMC Laboratory

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgs.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

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 ²
1.34	—	30	35.6 m	—	1.6 m	3,450 R ² /f ²
30	—	300	1.6 m	—	159 mm	3.83 R ²
300	—	1,500	159 mm	—	31.8 mm	0.0128 R ² f
1,500	—	100,000	31.8 mm	—	0.5 mm	19.2R ²
Subscripts L and H are low and high; λ 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)
300~1500MHz	915	0.0522	0.032
1500~100000MHz	2480	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.



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgsgroup.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com



SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

SZEMC-TRF-01 Rev. A/1

Report No.: SZCR250100024203

Page: 8 of 12

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.



SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing Center EMC Laboratory

Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing / inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgs.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

Member of the SGS Group (SGS SA)

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).

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

where

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

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



Unless otherwise agreed in writing, this document is issued by the Company subject to its General Conditions of Service printed overleaf, available on request or accessible at <https://www.sgs.com/en/Terms-and-Conditions>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions, if any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. This document cannot be reproduced except in full, without prior written approval of the Company. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law. 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.

Attention: To check the authenticity of testing /inspection report & certificate, please contact us at telephone: (86-755) 8307 1443, or email: CN.Doccheck@sgs.com

SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch Testing & Calibration Laboratory

No.1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China 518057 t (86-755) 26012053 f (86-755) 26710594 www.sgsgroup.com.cn
中国·广东·深圳市南山区科技园中区M-10栋1号厂房 邮编: 518057 t (86-755) 26012053 f (86-755) 26710594 sgs.china@sgs.com

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				
Frequency range(GHz)	Frequency(GHz)	X	Distance(cm)	Pth (mW)
0.3~1.5	0.915	1.474	0.5	8.133
1.5~6	2.48	1.905	0.5	2.717

5 Measurement and Calculation

5.1 Maximum transmit power

For BLE:

The Power Data is based on the RF Test Report SZCR250100024202.

Antenna Gain: 2.13dBi

Output Power Into Antenna & RF Exposure Evaluation Distance:

Frequency (MHz)	The Max. Conducted power [dBm]	The Max. EIRP [dBm]	The Max. EIRP (mW)
2402	-2.47	-0.34	0.92

Note: Refer to report No. SZCR250100024202 for EUT test Max Power Value.

5.2 RF Exposure Calculation

Remark: we used the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

For BLE:

The Max EIRP is 0.92mW. The best case gain of the antenna is 2.13dBi.

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	1mW	N/A
☐	MPE-based Exemption(ERP)	7mW(ERP)	N/A
☒	SAR-based Exemption(P_{th})	2.7	Yes

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

6 EUT Constructional Details (EUT Photos)

Refer to Appendix – External and Internal Photos for SZCR2501000242AT

-End of the Report-

