



**FCC Part 1 Subpart I  
FCC Part 2 Subpart J  
RSS 102 ISSUE 5**

**RF EXPOSURE REPORT**

**FOR**

**AUDIO BLUETOOTH ACCESSORY**

**MODEL NUMBER: MBC-298**

**FCC ID: 2AYRY-MBC-298  
IC: 26900-MBC298**

**REPORT NUMBER: R13585640-E1**

**ISSUE DATE: DRAFT**

**Prepared for  
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## REVISION HISTORY

Rev.	Issue Date	Revisions	Revised By
1	DRAFT	Initial Issue	M. Antola

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## 1. ATTESTATION OF TEST RESULTS

**COMPANY NAME:** Nuwhirl Systems Corp.  
22520 Temescal Canyon Rd., Suite B  
Corona, CA 92883 USA

**EUT DESCRIPTION:** Audio Bluetooth Accessory

**MODEL:** MBC-298

**SERIAL NUMBER:** Non-serialized production unit

**SAMPLE RECEIPT DATE:** 2020-11-30, 2020-12-29

APPLICABLE STANDARDS	
STANDARD	TEST RESULTS
FCC PART 1 SUBPART I & PART 2 SUBPART J	Complies
RSS 102 ISSUE 5	Complies

UL LLC. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

This document may not be altered or revised in any way unless done so by UL LLC. and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL LLC. will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the U.S. government.

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## **2. TEST METHODOLOGY**

All calculations were made in accordance with FCC Parts 1.1310, 2.1091, 2.1093, KDB 447498 D01 v06, KDB 447498 D03 V01, IEEE Std C95.1-2005, IEEE Std C95.3-2002, IC Safety Code 6 and RSS 102 Issue 5.

## **3. REFERENCES**

All measurements were made as documented in test report UL LLC Documents R13585640-E3 for operation in the 2.4 GHz band.

Output power, Duty cycle and Antenna gain data is excerpted from applicable test reports and product documentation provided by the applicant.

## **4. FACILITIES AND ACCREDITATION**

The test sites and measurement facilities used to collect data are located at 12 Laboratory Dr., Research Triangle Park, NC 27709, USA and 2800 Perimeter Park Dr., Suite B, Morrisville, NC 27560, USA.

UL LLC (RTP) is accredited by NVLAP, Laboratory Code 200246-0.

## 5. MAXIMUM PERMISSIBLE EXPOSURE (LIMITS AND EQUATIONS)

### 5.1. FCC RULES

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm <sup>2</sup> )	Averaging time (minutes)
<b>(A) Limits for Occupational/Controlled Exposure</b>				
0.3-3.0	614	1.63	*100	6
3.0-30	1842/f	4.89/f	*900/f <sup>2</sup>	6
30-300	61.4	0.163	1.0	6
300-1,500			f/300	6
1,500-100,000			5	6
<b>(B) Limits for General Population/Uncontrolled Exposure</b>				
0.3-1.34	614	1.63	*100	30
1.34-30	824/f	2.19/f	*180/f <sup>2</sup>	30
30-300	27.5	0.073	0.2	30
300-1,500			f/1500	30
1,500-100,000			1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

#### **Notes:**

- (1) Occupational/controlled exposure limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when a person is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.
- (2) General population/uncontrolled exposure limits apply in situations in which the general public may be exposed, or in which persons who are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure

## 5.2. ISED RULES

For the purpose of this standard, Innovation, Science and Economic Development (ISED) has adopted the SAR and RF field strength limits established in Health Canada's RF exposure guideline, Safety Code 6.

**Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)**

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m <sup>2</sup> )	Reference Period (minutes)
0.003-10 <sup>21</sup>	83	90	-	Instantaneous*
0.1-10	-	0.73/ $f$	-	6**
1.1-10	87/ $f^{0.5}$	-	-	6**
10-20	27.46	0.0728	-2	6
20-48	58.07/ $f^{0.25}$	0.1540/ $f^{0.25}$	8.944/ $f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	3.142 $f^{0.3417}$	0.008335 $f^{0.3417}$	0.02619 $f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	616000/ $f^{1.2}$
150000-300000	0.158 $f^{0.5}$	4.21 x 10 <sup>-4</sup> $f^{0.5}$	6.67 x 10 <sup>-5</sup> $f$	616000/ $f^{1.2}$

**Note:**  $f$  is frequency in MHz.

\* Based on nerve stimulation (NS).

\*\* Based on specific absorption rate (SAR).

### **5.3. EQUATIONS**

#### **POWER DENSITY**

Power density is given by:

$$S = \text{EIRP} / (4 * \text{Pi} * D^2)$$

Where

S = Power density in mW/cm<sup>2</sup>

EIRP = Equivalent Isotropic Radiated Power in mW

D = Separation distance in cm

Power density in units of mW/cm<sup>2</sup> is converted to units of W/m<sup>2</sup> by multiplying by 10.

#### **DISTANCE**

Distance is given by:

$$D = \text{SQRT} (\text{EIRP} / (4 * \text{Pi} * S))$$

Where

D = Separation distance in cm

EIRP = Equivalent Isotropic Radiated Power in mW

S = Power density in mW/cm<sup>2</sup>

#### **SOURCE-BASED DUTY CYCLE**

Where applicable (for example, multi-slot cell phone applications) a duty cycle factor may be applied.

$$\text{Source-based time-averaged EIRP} = (\text{DC} / 100) * \text{EIRP}$$

Where

DC = Duty Cycle in %, as applicable

EIRP = Equivalent Isotropic Radiated Power in mW



### **MIMO AND COLOCATED TRANSMITTERS (IDENTICAL LIMIT FOR ALL TRANSMITTERS)**

For multiple chain devices, and colocated transmitters operating simultaneously in frequency bands where the limit is identical, the total power density is calculated using the total EIRP obtained by summing the EIRP (in linear units) of each transmitter.

$$\text{Total EIRP} = (\text{EIRP1}) + (\text{EIRP2}) + \dots + (\text{EIRPn})$$

where

EIRPx = Source-based time-averaged EIRP of chain x or transmitter x

The total EIRP is then used to calculate the Power Density or the Distance as applicable.

### **MIMO AND COLOCATED TRANSMITTERS (NON-IDENTICAL LIMIT FOR ALL TRANSMITTERS)**

For multiple colocated transmitters operating simultaneously in frequency bands where different limits apply:

The Power Density at the specified separation distance is calculated for each transmitter chain or transmitter.

The fraction of the exposure limit is calculated for each chain or transmitter as  
(Power Density of chain or transmitter) / (Limit applicable to that chain or transmitter).

The fractions are summed.

Compliance is established if the sum of the fractions is less than or equal to one.

## 6. RF EXPOSURE RESULTS

In the table(s) below, Power and Gain are entered in units of dBm and dBi respectively and conversions to linear forms are used for the calculations.

(Single chain transmitters, no colocation, 20 cm MPE distance)

Single Chain and non-colocated transmitters										
Band	Mode	Separ. Distance (cm)	Output AVG Power (dBm)	Ant. Gain (dBi)	Duty Cycle (%)	EIRP (mW)	FCC PD (mW/cm <sup>2</sup> )	ISED PD (W/m <sup>2</sup> )	FCC PD Limit (mW/cm <sup>2</sup> )	ISED PD Limit (W/m <sup>2</sup> )
2.4GHz	BT	20	2.50	0.00	30.0	0.53	0.0001	0.001	1.00	5.35

### Notes:

- 1) The manufacturer configures output power so that the maximum power, after accounting for manufacturing tolerances, will never exceed the maximum power level measured.
- 2) KDB 447498 requires the calculations to use the maximum rated power; that power should be declared by the manufacturer and should not be lower than the measured power. If the power has a tolerance, then we also need to check that the measured power is within the tolerance.
- 3) The antenna gain in the tables above is the maximum antenna gain among various channels within the specified band. Output AVG power is the maximum power measured during testing.

**END OF TEST REPORT**