



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

EMC-TRF-03 Rev 1.1

Report No.: GZCR240100002703

Page: 1 of 9

FCC ID: 2BA5X-S2317X8X-S3

RF EXPOSURE EVALUATION REPORT

Application No.: GZCR2401000027HS
Applicant: American Accessories International, LLC
Address of Applicant: 550 W. Main St. Suite 825 Knoxville, TN 37902
Manufacturer: SHENZHEN BOTOO ELECTRONIC TECHNOLOGY CO., LTD
Address of Manufacturer: 5th Floor, Building 4, Hanhaida High tech Industrial Park, Tianliao Tenth Industrial Zone, Yutang Street, Guangming New District, Shenzhen, Guangdong Province, China
Factory: SHENZHEN BOTOO ELECTRONIC TECHNOLOGY CO., LTD
Address of Factory: 5th Floor, Building 4, Hanhaida High tech Industrial Park, Tianliao Tenth Industrial Zone, Yutang Street, Guangming New District, Shenzhen, Guangdong Province, China
Product Name: Surface
Model No.: S23178C, S23179C, S23180B, S23181B, S23179D, S23180C, S23181C, S23179E, S23180D, S23181D ♣
♣ Please refer to section 2 of this report which indicates which item was actually tested and which were electrically identical.
Standard(s) : 47 CFR Part 1.1310
KDB447498 D01 General RF Exposure Guidance v06
Date of Receipt: 2024-01-03
Date of Evaluation: 2024-01-11 to 2024-01-11
Date of Issue: 2024-01-18

Evaluation Result:	Pass*
---------------------------	--------------

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

Ricky Liu

Ricky Liu
Manager



SGS-CSTC Standards Technical Services Co., Ltd.
Guangzhou Branch Testing Center EEC 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.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou, Guangdong, China 510663 t (86-20) 82155555 www.sgsgroup.com.cn
中国·广东·广州高新技术产业开发区科学城科珠路198号 邮编: 510663 t (86-20) 82155555 sgs.china@sgs.com

Member of the SGS Group (SGS SA)

Revision Record			
Version	Report No.	Date	Remark
01	GZCR240100002703	2024-01-18	Original

Authorized for issue by:				
		Jim Li		
		Jim Li/Project Engineer		
		Vico Cui		
		Vico Cui/Reviewer		

2 Evaluation Summary

Item	Standard	Method	Requirement	Result
RF Exposure	KDB447498 D01 General RF Exposure Guidance v06	KDB447498 D01 General RF Exposure Guidance v06	47 CFR Part 1.1310	Pass

Note:

E.U.T./EUT means Equipment Under Test.

Pass means the test result passed the test standard requirement, please find the detailed decision rule in the report relative section.

♣ Declaration of EUT Family Grouping:

Model No.: S23178C, S23179C, S23180B, S23181B, S23179D, S23180C, S23181C, S23179E, S23180D, S23181D

According to the declaration from the applicant, the electrical circuit design, layout, components used and internal wiring were identical for all models, with only difference on model name and outer decoration.

Therefore only one model S23181C was tested in this report.



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.
Guangzhou Branch Testing & Calibration Laboratory

No.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou, Guangdong, China 510663
中国·广东·广州高新技术产业开发区科学城科珠路198号 邮编: 510663

t (86-20) 82155555 www.sgsgroup.com.cn
t (86-20) 82155555 sgs.china@sgs.com

3 Contents

	Page
1 Cover Page	1
2 Evaluation Summary.....	3
3 Contents.....	4
4 General Information	5
4.1 Details of E.U.T.	5
4.2 Evaluating Location	5
4.3 Facility	5
4.4 Deviation from Standards.....	5
4.5 Abnormalities from Standard Conditions	6
5 Technical Requirements Specification	7
5.1 General Description of Applied Standards	7
5.2 RF Exposure Evaluation.....	7
5.2.1 Limit & Test Method	7
5.2.2 Conclusion	8
6 EUT Constructional Details (EUT Photos)	9



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.
Guangzhou Branch Testing Center EEC Laboratory

No.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou, Guangdong, China 510663
中国·广东·广州高新技术产业开发区科学城科珠路198号 邮编: 510663

t (86-20) 82155555 www.sgsgroup.com.cn
t (86-20) 82155555 sgs.china@sgs.com

4 General Information

4.1 Details of E.U.T.

Power supply: DC 6V= size 'CR2450' 3V x2pcs paralleling x2pcs series connection
Cable(s): N/A
RF character: Refer to report GZCR240100002702 for BLE detail.

4.2 Evaluating Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd., Guangzhou Branch EMC Laboratory,
198 Kezhu Road, Sciencetech Park, Guangzhou Economic & Technology Development District,
Guangzhou, China 510663

Tel: +86 20 82155555 Fax: +86 20 82075059

No tests were sub-contracted.

4.3 Facility

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

- **ACMA**

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory can also perform testing for the Australian/New Zealand Regulatory Compliance Mark (RCM).

- **SGS UK(Certificate No.: 32), SGS-TUV SAARLAND and SGS-FIMKO**

Have approved SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory as a supplier of EMC TESTING SERVICES and SAFETY TESTING SERVICES.

- **FCC Recognized Accredited Test Firm(Registration No.: 486818)**

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory has been accredited and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Designation Number: CN5016, Test Firm Registration Number: 486818.

- **ISED (Registration No.: 4620B, CAB identifier: CN0052)**

SGS-CSTC Standards Technical Services Co., Ltd., has been registered by Innovation Science and Economic Development Canada for Wireless Device Testing laboratories to test to Canadian radio equipment requirements. Registration No. 4620B, CAB identifier: CN0052.

- **VCCI (Registration No.: R-12460, C-12584, G-20107 and T-11179)**

The 10m Semi-anechoic chamber, 966 Anechoic Chamber and Shielded Room of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-12460, C-12584, G-20107 and T-11179 respectively.

- **CBTL (Lab Code: TL129)**

SGS-CSTC Standards Technical Services Co., Ltd., E&E Laboratory has been assessed and fully comply with the requirements of ISO/IEC 17025:2017, the Basic Rules, IECEE 01 and Rules of procedure IECEE 02, and the relevant IECEE CB-Scheme Operational documents.

4.4 Deviation from Standards

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.
Guangzhou Branch EMC Laboratory

No.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou, Guangdong, China 510663
中国·广东·广州高新技术产业开发区科学城科珠路198号 邮编: 510663

t (86-20) 82155555 www.sgsgroup.com.cn
t (86-20) 82155555 sgs.china@sgs.com

4.5 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

5 Technical Requirements Specification

5.1 General Description of Applied Standards

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.

5.2 RF Exposure Evaluation

5.2.1 Limit & Test Method

According to FCC Part1.1310: The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency (RF) radiation as specified in part1.1307(b)

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 ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled Exposures				
0.3–3.0	614	1.63	*(100)	6
3.0–30	1842/f	4.89/f	*(900/f ²)	6
30–300	61.4	0.163	1.0	6
300–1500			f/300	6
1500–100,000			5	6
(B) Limits for General Population/Uncontrolled Exposure				
0.3–1.34	614	1.63	*(100)	30
1.34–30	824/f	2.19/f	*(180/f ²)	30
30–300	27.5	0.073	0.2	30
300–1500			f/1500	30
1500–100,000			1.0	30

F= Frequency in MHz

Friis Formula

Friis transmission formula: $P_d = (P_{out} * G) / (4 * P_i * R^2)$

Where

P_d = power density in mW/cm²

P_{out} = output power to antenna in mW

G = gain of antenna in linear scale

P_i = 3.1416

R = distance between observation point and center of the radiator in cm

P_d is the limit of MPE, 1 mW/cm². If we know the maximum gain of the antenna and the total power input to the antenna, through the calculation, we will know the distance r where the MPE limit is reached.



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. No.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou, Guangdong, China 510663 t (86-20) 82155555 www.sgs.com.cn
Guangzhou Branch, Testing & Calibration Laboratory, 中国·广东·广州高新技术产业开发区科学城科珠路198号 邮编: 510663 t (86-20) 82155555 sgs.china@sgs.com

5.2.2 Conclusion

Normal use condition for
Distance between antenna and body: 20cm declared by applicant

Antenna Gain: 2.62 dBi
For Bluetooth BLE

Frequency (MHz)	Antenna Gain (Numeric)	Peak Output Power (dBm)	Peak Output Power (mW)	Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
2402	1.828100216	-2.97	0.50	0.00018	1	Complies
2440	1.828100216	-3.19	0.48	0.00017	1	Complies
2480	1.828100216	-3.93	0.40	0.00015	1	Complies

So SAR report is not required.

Note: Refer to report GZCR240100002702 for EUT test Max Conducted Peak Output Power value.

6 EUT Constructional Details (EUT Photos)

Refer to External and Internal Photos for GZCR2401000027HS

- End of the Report -

