

RF EXPOSURE

Test Report

Report No. : MTi250513009-0106E3
Date of Issue : 2025-06-09
Applicant : ZhiHaiHe Marketing (ShenZhen) Co., Ltd
Product : Varmilo Minilo75 Pro
Model(s) : Minilo75 Pro
FCC ID : 2BDPP-MINILO75PRO

Shenzhen Microtest Co., Ltd.

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Test Result Certification	
Applicant	ZhiHaiHe Marketing (ShenZhen) Co., Ltd
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Manufacturer	SHENZHEN ARBITER TECHNOLOGY CO., LTD
Manufacturer Address	Floor 2, 3 and 4, Bldg. A, Meisheng Industrial Park, Chongqing Rd., Fuhai St., Baoan Dist., Shenzhen, Guangdong
Product description	
Product name	Varmilo Minilo75 Pro
Trademark	Varmilo
Model name	Minilo75 Pro
Series Model(s)	N/A
Standards	47 CFR Part 2.1093
Test method	KDB 447498 D01 v06
Testing Information	
Date of test	2025-05-30 to 2025-06-07
Test Result	Pass
Prepared by:	Maleah Deng
Reviewed by:	David Lee
Approved by:	Lewis Lian



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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 Test Exclusion Threshold condition(s), listed below, is (are) satisfied.

These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.

The minimum test separation distance defined in 4.1 f) 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.

To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified, typically in the SAR measurement or SAR analysis report, by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, according to the required published RF exposure KDB procedures.

When no other RF exposure testing or reporting are required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for SAR test exclusion.

When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions.

- For 100 MHz to 6 GHz and test separation distances \leq 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

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

- $f_{(\text{GHz})}$ 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 values 3.0 and 7.5 are referred to as *numeric thresholds* in step b) below

The test exclusions are applicable only when the minimum test separation distance is \leq 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 according to 4.1 f) 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):

- $\{[\text{Power allowed at numeric threshold for 50 mm in step a})] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\} \text{ mW, for 100 MHz to 1500 MHz}$
- $\{[\text{Power allowed at numeric threshold for 50 mm in step a})] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\} \text{ mW, for } > 1500 \text{ MHz and } \leq 6 \text{ GHz}$

- 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 $[1 +$



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log(100/f(MHz))]

- 2) 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 $\frac{1}{2}$
- 3) SAR measurement procedures are not established below 100 MHz.

When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any SAR test results below 100 MHz to be acceptable.

2 SAR Test Exclusion Thresholds

We use 5mm as separation distance to calculated.

Bluetooth DSS:

BLE:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up	Result	1g SAR test exclusion threshold
				power(dBm)	calculation	
2402	GFSK-1M	-0.28	0±1	1	0.3902	3
2440		0.32	0±1	1	0.3934	3
2480		0.64	0±1	1	0.3965	3
2402	GFSK-2M	-0.28	0±1	1	0.3902	3
2440		0.30	0±1	1	0.3934	3
2480		0.57	0±1	1	0.3965	3

2.4G SRD:

Operation Frequency: 2402-2480MHz,
conducted power comes from the following calculations:

9.5 Equations to calculate EIRP

Calculate the EIRP from the radiated field strength in the far field using Equation (22):

$$\text{EIRP} = E_{\text{Meas}} + 20 \log(d_{\text{Meas}}) - 104.7 \quad (22)$$

where

E_{IRP}

is the equivalent isotropically radiated power, in dBm

E_{Meas}

is the field strength of the emission at the measurement distance, in dB μ V/m

d_{Meas}

is the measurement distance, in m

NOTE—Because this equation yields the identical result whether the field strength is extrapolated using the default 20 dB/decade of distance extrapolation factor, or the field strength is not extrapolated for distance, this equation can generally be applied directly (with no further correction) to determine EIRP. In some cases, a different distance correction factor may be required; see 9.1.



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SRD 2.4G:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up	Result	1g SAR test exclusion threshold
				power(dBm)	calculation	
2.402	GFSK	-9.34	(-9)±1	-8	0.0491	3
2.440		-7.58	(-7)±1	-6	0.0785	3
2.480		-7.79	(-7)±1	-6	0.0791	3

Conclusion:

Note: SRD 2.4G and BLE cannot be launched at the same time.

For the max result: $0.3965 \leq 3.0$ for 1g SAR test exclusion threshold, No SAR is required.

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***** END OF REPORT *****