

KDB 680106 D01 RF Exposure Wireless Charging Apps v04

RF EXPOSURE EVALUATION REPORT

For

Lush Wireless Charger

Model: Bath Bot 01

FCC ID: 2BLRI-LUSHBATHBOT01

REPORT NUMBER UL-SAR-RP14962619JD10B V4.0

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Prepared for

LUSH LTD.

**29 HIGH STREET
POOLE,
BH15 1AB**

UNITED KINGDOM

Prepared by

UL INTERNATIONAL (UK) LTD

**UNIT 1-4 HORIZON, WADE ROAD, KINGSLAND BUSINESS PARK
BASINGSTOKE, HAMPSHIRE, RG24 8AH, UK**

TEL: +44 (0) 1256 312100

FAX: +44 (0) 1256 312001



REVISION HISTORY

Ver.	Issue Date	Revisions	Revised By
1.0	10 May 2024	Initial Issue	--
2.0	05 June 2025	Test results updated with 20cm separation distance	Masood Khan
3.0	21 July 2025	Updated Operating Frequency Range	Masood Khan
4.0	22 July 2025	Updated Power supply information	Masood Khan

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Applicant Name*:	LUSH LIMITED					
Model*:	Bath Bot 01					
Test Device is	A representative test sample					
Device category*:	Bluetooth Wireless Speaker with WPT Charger					
Date Tested	27 November 2023 to 21 May 2025					
Highest Reported Field Strength Values	Operating Mode		Separation Distance	Magnetic Field	Electric Field	
	Charger (DUT Only)	Top	20 cm	0.023 A/m	0.067 V/m	
		Side		0.014 A/m	0.052 V/m	
	On Charging (DUT + Speaker)	Top	20 cm	0.204 A/m	0.186 V/m	
		Side		0.053 A/m	1.297 V/m	
	On Charge with Speaker ON (DUT + Speaker Playing)	Top	20 cm	0.191 A/m	1.986 V/m	
		Side		0.041 A/m	1.190 V/m	
Applicable Standards	Title 47 CFR (Part 1.1310) KDB publication					
Test Results	Pass					
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Approved & Released By:		Prepared By:				
						
Naseer Mirza Operations Leader		Masood Khan Senior Test Engineer				

1. Test Specification, Methods and Procedures

1.1. Test Specification

Reference Standard:	KDB 680106 D01 RF Exposure Wireless Charging App v04
Title:	Assessment of electronic and electrical equipment related to human exposure restrictions for electromagnetic fields (0 Hz – 300 GHz)
Purpose of Test:	<p>This International Standard applies to electronic and electrical equipment for Wireless Power transfer where inductive coupling techniques are commonly used. This method requires one or more primary inductive coils with operating frequency and power level determined by the specific application requirements.</p> <p>The object of this generic standard is to provide assessment methods and criteria to evaluate such equipment against basic restrictions or reference levels on exposure of the general public related to electric, magnetic and electromagnetic fields and induced and contact current.</p>

2.1. FCC Applicable Limits

§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).

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	1842f	4.89f	*(900f 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	824f	2.19f	*(180f ²)	30

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)—Continued

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
30–300	27.5	0.073	0.2	30
300–1500			f/1500	30
1500–100,000			1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

NOTE 1 TO TABLE 1: Occupational/controlled 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 an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or can not exercise control over their exposure.

1.2. Definition of Measurement Equipment

The measurement equipment used complied with the requirements of the standards referenced in the methods and procedures in the section above. 'Section 4.1' contains the list of the test equipment used.

2. Facilities and Accreditation

The measurement facilities used to collect data are located at:

Unit 1-4 Horizon, Wade Road, Kingsland Business Park, Basingstoke, Hampshire, RG24 8AH, UK

Test Sites	Facility Type
SAR Lab 72	Controlled Environment Chamber

3. Test Description

The following conditions were met prior to perform the measurements:

- Test environment was an open area free of metal objects that could influence the measurements and was also free of ambient signals and background noise.
- Measurement instrumentation was placed on a non-conductive support.
- Measurements were taken distancing the body of the operator from the DUT and the measuring probe in order to mitigate any effects the body of the operator could cause to the field and the instrumentation.
- A 3-dimension coordinate system was established to position the probe in order to keep traceability of the measured field strengths.

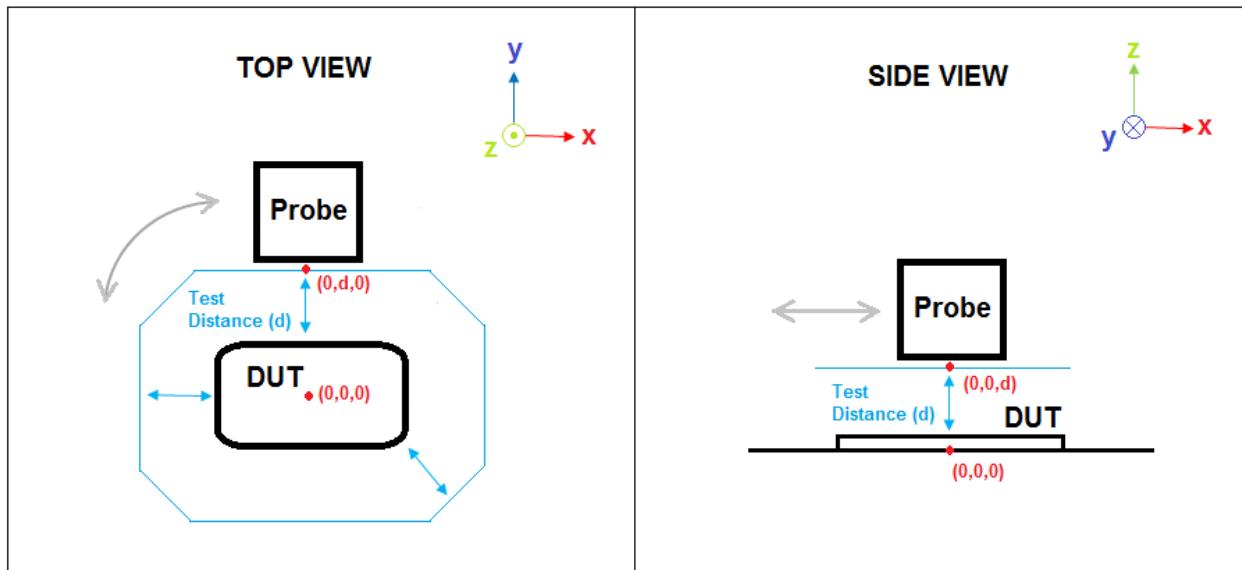
3.1. Measurement Procedure

According to KDB 680106 v04 for any device designed for typical desktop applications, RF exposure evaluation should be conducted at separation distance of 20 cm.

The following procedure was followed to measure the incident electric and magnetic field strengths for each of the configurations under test:

- Independent field evaluation was performed for each of the defined edges under test.
- Closest separation distance was used as distance from the edge of the device to the edge of the sensor of the probe. In case separation distance was not provided, a logical distance based on normal usage condition was defined.
- For each edge under test:
 - A preliminary scan was performed to determine the position(s) of maximum electric and magnetic field at the closest separation distance.
 - Electric and magnetic field strengths were recorded at the maximum field position. Measurements were taken as RMS average over a 6-minute period. Coordinates of the maximum field position were also recorded.

The following diagram describes the test setup:



3.2. Test Equipment

Measuring equipment used to perform the tests is documented in this report and has been calibrated in accordance with UKAS' recommendations and is traceable to recognized national standards.

UL No.	Instrument	Manufacturer	Type No.	Serial No.	Date Last Calibrated	Cal. Interval (Months)
221910	EMF Probe Analyzer	NARDA	EHP-200AC	180ZX20504	30 Aug 2023	12**
221910	EMF Probe Analyzer	NARDA	EHP-200AC	180ZX20504	14 May 2025	12

**Note: The test equipment was within 1-year annual calibration during the time of testing.

4. Measurement Uncertainty

No measurement or test can ever be perfect and the imperfections give rise to error of measurement in the results. Consequently, the result of a measurement is only an approximation to the value of the measurand (the specific quantity subject to measurement) and is only complete when accompanied by a statement of the uncertainty of the approximation.

The expression of uncertainty of a measurement result allows realistic comparison of results with reference values and limits given in specifications and standards.

The uncertainty of the result may need to be taken into account when interpreting the measurement results.

The reported expanded uncertainties below are based on a standard uncertainty multiplied by an appropriate coverage factor, such that a confidence level of approximately 95% is maintained. For the purposes of this document "approximately" is interpreted as meaning "effectively" or "for most practical purposes".

Test Name	Confidence Level	Calculated Uncertainty (%)	
Electric Field Measurement Uncertainty between 9 kHz and 30 MHz	95%	+11.3	-10.4
Magnetic Field Measurement Uncertainty between 9 kHz and 30 MHz	95%	+14.4	-12.7

The methods used to calculate the above uncertainties are in line with those recommended within the various measurement specifications. Where measurement specifications do not include guidelines for the evaluation of measurement uncertainty, the published guidance of the appropriate accreditation body is followed.

4.1. Electric Field Measurement Uncertainty between 3 kHz and 30 MHz

Type	Source of uncertainty	+ Value	- Value	Probability Distribution	Divisor	c _i	Standard Uncertainty		v _i or v _{eff}
							+ u (%)	- u (%)	
B	Uncertainty of the Calibration of the Sensor	0.3902	0.4287	Normal (k=2)	2.0000	1.0000	0.1951	0.2144	∞
B	Uncertainty of the Frequency Response of the Sensor	0.5000	0.5000	Rectangular	1.7321	1.0000	0.2887	0.2887	∞
B	Uncertainty of the Non- Linearity	0.5000	0.5000	Rectangular	1.7321	1.0000	0.2887	0.2887	∞
B	Uncertainty of the Resolution of the Measurement System	0.0004	0.0004	Rectangular	1.7321	1.0000	0.0002	0.0002	∞
B	Uncertainty of the Temperature Variation	0.2490	0.2490	Rectangular	1.7321	1.0000	0.1438	0.1438	∞
A	Uncertainty of the Repeatability of the Measurements	0.0458	0.0463	Normal (k=1)	1.0000	1.0000	0.0458	0.0463	44
	Combined standard uncertainty			t-distribution			0.48	0.49	>500
	Expanded uncertainty			k = 1.96			0.93	0.95	>500

4.2. Magnetic Field Measurement Uncertainty between 3 kHz and 300 kHz

Type	Source of uncertainty	+ Value	- Value	Probability Distribution	Divisor	c _i	Standard Uncertainty		v _i or v _{eff}
							+ u (%)	- u (%)	
B	Uncertainty of the Calibration of the Sensor	0.3743	0.4096	Normal (k=2)	2.0000	1.0000	0.1871	0.2048	∞
B	Uncertainty of the Frequency Response of the Sensor	0.8000	0.8000	Rectangular	1.7321	1.0000	0.4619	0.4619	∞
B	Uncertainty of the Non- Linearity	0.5000	0.5000	Rectangular	1.7321	1.0000	0.2887	0.2887	∞
B	Uncertainty of the Resolution of the Measurement System	0.0432	0.0436	Rectangular	1.7321	1.0000	0.0249	0.0252	∞
B	Uncertainty of the Temperature Variation	0.2490	0.2490	Rectangular	1.7321	1.0000	0.1438	0.1438	∞
A	Uncertainty of the Repeatability of the Measurements	0.0458	0.0463	normal (k=1)	1.0000	1.0000	0.0458	0.0463	44
	Combined standard uncertainty			t-distribution			0.60	0.60	>500
	Expanded uncertainty			k = 1.96			1.17	1.18	>500

5. Equipment Under Test (EUT)

5.1. Identification of Equipment Under Test (EUT)

Sample Serial Number*:	14 and 16
Hardware Version Number*:	REV C for Speaker & REV B for Charger
Software Version Number*:	N/A
Firmware Version*:	V0.11.0
Country of Manufacture*:	UK
Date of Receipt:	14 November 2023
Device Description*:	Waterproof Bluetooth Speaker and Charger
Device Dimension*:	(H x W x D mm): 70x80x80 mm (BT Speaker) (H x W x D mm): 10x80x80 mm (charging base)
Power Supply Requirement (s)*:	5 VDC via 120 VAC mains

5.2. Wireless Technologies

Wireless Technologies	Operating Frequency	Operating Mode	Duty Cycle
WPT	110 kHz - 205 kHz	Charger (DUT Only)	Automatically adjusted
		On Charging (DUT + Speaker)	
		On Charge with Speaker ON (DUT + Speaker Playing)	

5.3. Antenna Information

Antenna Information	Antenna Type
Main Function*:	Wireless Charger for Speaker
WPT Source*:	Charger
WPT Client*:	BT Speaker
WPT Source Coil Details (number of coils & turns) *:	One copper coil with ferrite core
WPT Source Coil Area*:	Approx. 5 cm ²
WPT Client Coil Details (number of coils & turns) *:	One copper coil
WPT Client Coil Area*:	Approx. 2.5 cm ²

6. Measurements and Derived Results

The EUT is a powered Bluetooth Wireless Speaker with Bluetooth Low Energy functionality & Wireless Power Transfer (WPT) charging. The configuration considered for testing were all sides (Side 1, Side 2, Side 3, Side 4, Side 5, Side 6, side 7 and Side 8) and Top of the DUT, in order to achieve the maximum exposure side, a preliminary scan of 30 seconds measured at 10cm separation distance, then a full scan of 6minutes performed on worst case achieved

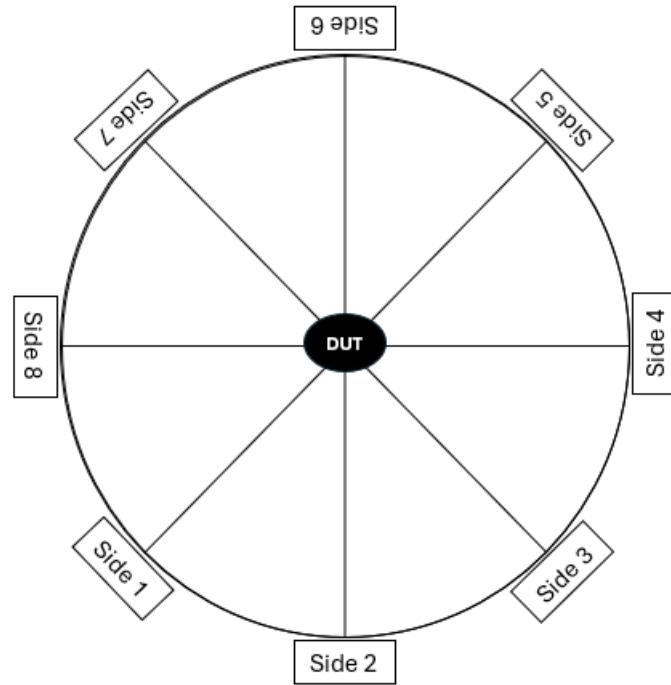
Operating modes considered as

1. Charger (DUT Only) - as there are possibilities of user interaction without Load while charging.
2. On Charging (DUT + Speaker) and
3. On Charge with Speaker ON (DUT + Speaker Playing)

Configuration	Distance	Operating Modes
All Sides	10 ¹ cm	All 3 above
Worst case (from all Sides)	20 ¹ cm	
Top	10 ¹ cm	All 3 above
	20 ¹ cm	

Note¹: for actual separation distance calculation refer to section 7.1

All side @ 20 cm separation distance



6.1. Test Results for Electric and Magnetic Field Measurements

The following procedure was followed to measure the incident electric and magnetic field strengths for each of the configurations under test:

- Independent field evaluation will be performed for each of the defined edges under test.
- Measurements performed at 20cm as per the compliance with RF exposure guidelines.

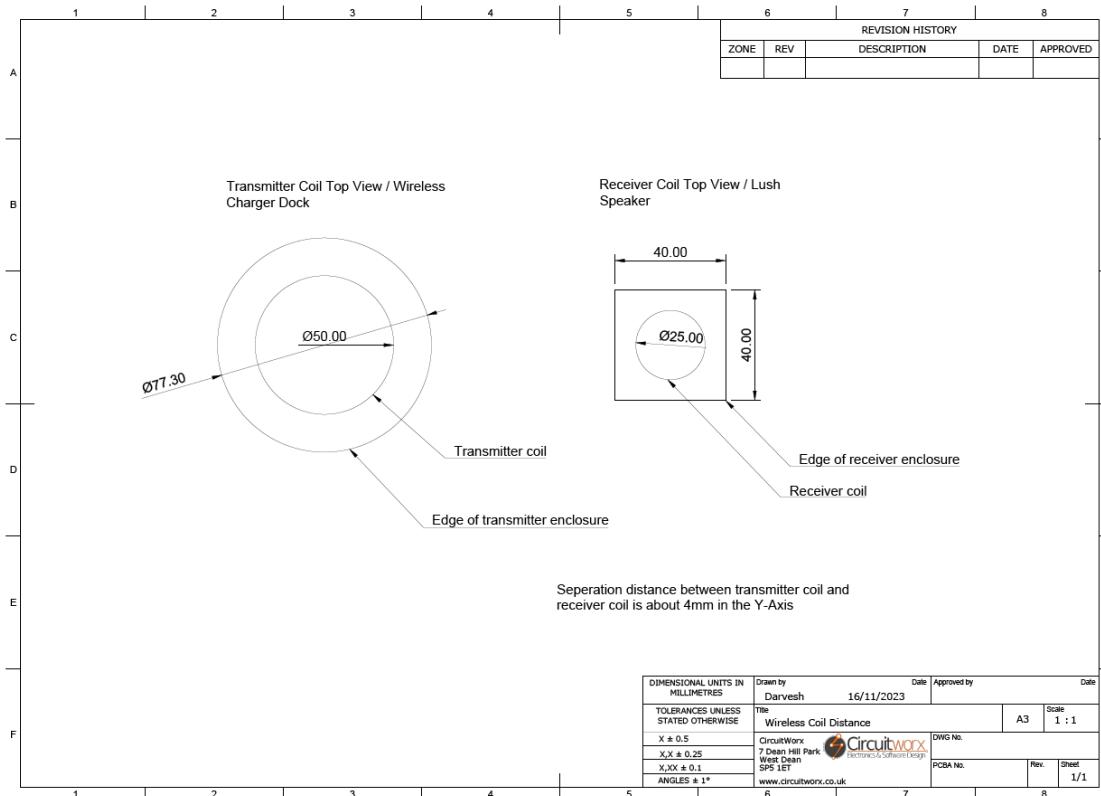


Figure 3 Diagram showing distances between Transmitting Coil and Receiving Coil

As above schematics distance between transmitting Coil and Edge is $\frac{77.30\text{mm} - 50.00\text{mm}}{2} = 13.65\text{mm (1.365cm)}$

And

Narda Probe EHP-200AC Probe's Sensitive elements are located **8mm (0.8cm)** below the Surface
Distance of 2.165 compensated to the total distance

- When testing at 20cm, distance maintained was 17.835cm, from the edge of the device to the edge of the probe
- When testing at 10cm, distance maintained was 7.835cm, from the edge of the device to the edge of the probe

6.1.1. Test Results for H-Field Measurements

The table below shows the field strength limits to demonstrate compliance for the operating frequency of the device.

Type of Exposure	Frequency	Magnetic Field Strength
Occupational Exposure	110 kHz - 205 kHz	1.63 A/m
General Public Exposure		1.63 A/m

H – Field Measurement at 10 cm – Operating Modes with Charger (DUT Only)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
1	Side 1	10	30 Sec	0.099	-
2	Side 2	10	30 Sec	0.046	-
3	Side 3	10	30 Sec	0.100	-
4	Side 4	10	30 Sec	0.098	-
5	Side 5	10	30 Sec	0.089	-
6	Side 6	10	30 Sec	0.104 ¹	-
7	Side 7	10	30 Sec	0.074	-
8	Side 8	10	30 Sec	0.097	-
9	Top	10	30 Sec	1.15 ¹	-

Note¹: Worst-case operating mode

H – Field Measurement at 20 cm – Operating Modes with Charger (DUT Only)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
				Top	
1	Top	20	6 mins	0.023	001
2	Side 6	20	6 mins	0.014	002

H – Field Measurement at 10 cm – Operating Modes with on Charging (DUT + Speaker)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
1	Side 1	10	30 Sec	0.387	-
2	Side 2	10	30 Sec	0.367	-
3	Side 3	10	30 Sec	0.385	-
4	Side 4	10	30 Sec	0.390	-
5	Side 5	10	30 Sec	0.374	-
6	Side 6	10	30 Sec	0.374	-
7	Side 7	10	30 Sec	0.391 ¹	-
8	Side 8	10	30 Sec	0.390	-
9	Top	10	30 Sec	1.479 ¹	-

Note¹: Worst-case operating mode

H – Field Measurement at 20 cm – Operating Modes with on Charging (DUT + Speaker)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
1	Top	20	6 mins	0.204	003
2	Side 7	20	6 mins	0.053	004

H – Field Measurement at 10 cm – Operating Modes with on Charge with Speaker ON (DUT + Speaker Playing)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
1	Side 1	10	30 Sec	0.434 ¹	-
2	Side 2	10	30 Sec	0.385	-
3	Side 3	10	30 Sec	0.402	-
4	Side 4	10	30 Sec	0.391	-
5	Side 5	10	30 Sec	0.385	-
6	Side 6	10	30 Sec	0.386	-
7	Side 7	10	30 Sec	0.392	-
8	Side 8	10	30 Sec	0.393	-
9	Top	10	30 Sec	1.441 ¹	-

Note¹: Worst-case operating mode

H – Field Measurement at 20 cm – Operating Modes with on Charge with Speaker ON (DUT + Speaker Playing)

Cases	Configuration	Separation Distance (cm)	Measurement Time	H-Field Measurement (A/m)	Plot No.
1	Top	20	6 mins	0.191	005
2	Side 1	20	6 mins	0.041	006

6.1.2. Test Results for E-Field Measurements

The table below shows the field strength limits to demonstrate compliance for the operating frequency of the device.

Type of Exposure	Frequency	Electric Field Strength
Occupational Exposure	110 kHz - 205 kHz	614 V/m
General Public Exposure		614 V/m

E – Field Measurement at 10 cm – Operating Modes with Charger (DUT Only)

Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Side 1	10	30 Sec	0.271	-
2	Side 2	10	30 Sec	0.092	-
3	Side 3	10	30 Sec	0.221	-
4	Side 4	10	30 Sec	0.366	-
5	Side 5	10	30 Sec	0.351	-
6	Side 6	10	30 Sec	0.442 ¹	-
7	Side 7	10	30 Sec	0.428	-
8	Side 8	10	30 Sec	0.333	-
9	Top	10	30 Sec	0.803 ¹	-

Note¹: Worst-case operating mode

E – Field Measurement at 20 cm – Operating Modes with Charger (DUT Only)

Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Top	00	6 mins	0.067	007
2	Side 6	00	6 mins	0.052	008

E – Field Measurement at 10 cm – Operating Modes with on Charging (DUT + Speaker)

Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Side 1	10	30 Sec	3.861 ¹	-
2	Side 2	10	30 Sec	1.251	-
3	Side 3	10	30 Sec	2.669	-
4	Side 4	10	30 Sec	3.017	-
5	Side 5	10	30 Sec	3.364	-
6	Side 6	10	30 Sec	3.537	-
7	Side 7	10	30 Sec	3.589	-
8	Side 8	10	30 Sec	3.603	-
9	Top	10	30 Sec	21.495 ¹	-

Note¹: Worst-case operating mode

E – Field Measurement at 20 cm – Operating Modes with on Charging (DUT + Speaker)

Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Top	20	6 mins	0.186	009
2	Side 1	20	6 mins	1.297	010

E – Field Measurement at 10 cm – Operating Modes with on Charge with Speaker ON (DUT + Speaker Playing)

Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Side 1	10	30 Sec	3.872	-
2	Side 2	10	30 Sec	0.988	-
3	Side 3	10	30 Sec	3.081	-
4	Side 4	10	30 Sec	3.261	-
5	Side 5	10	30 Sec	3.842	-
6	Side 6	10	30 Sec	3.926 ¹	-
7	Side 7	10	30 Sec	3.753	-
8	Side 8	10	30 Sec	3.881	-
9	Top	10	30 Sec	20.739 ¹	-

Note¹: Worst-case operating mode

E – Field Measurement at 20 cm – Operating Modes with on Charge with Speaker ON (DUT + Speaker Playing)

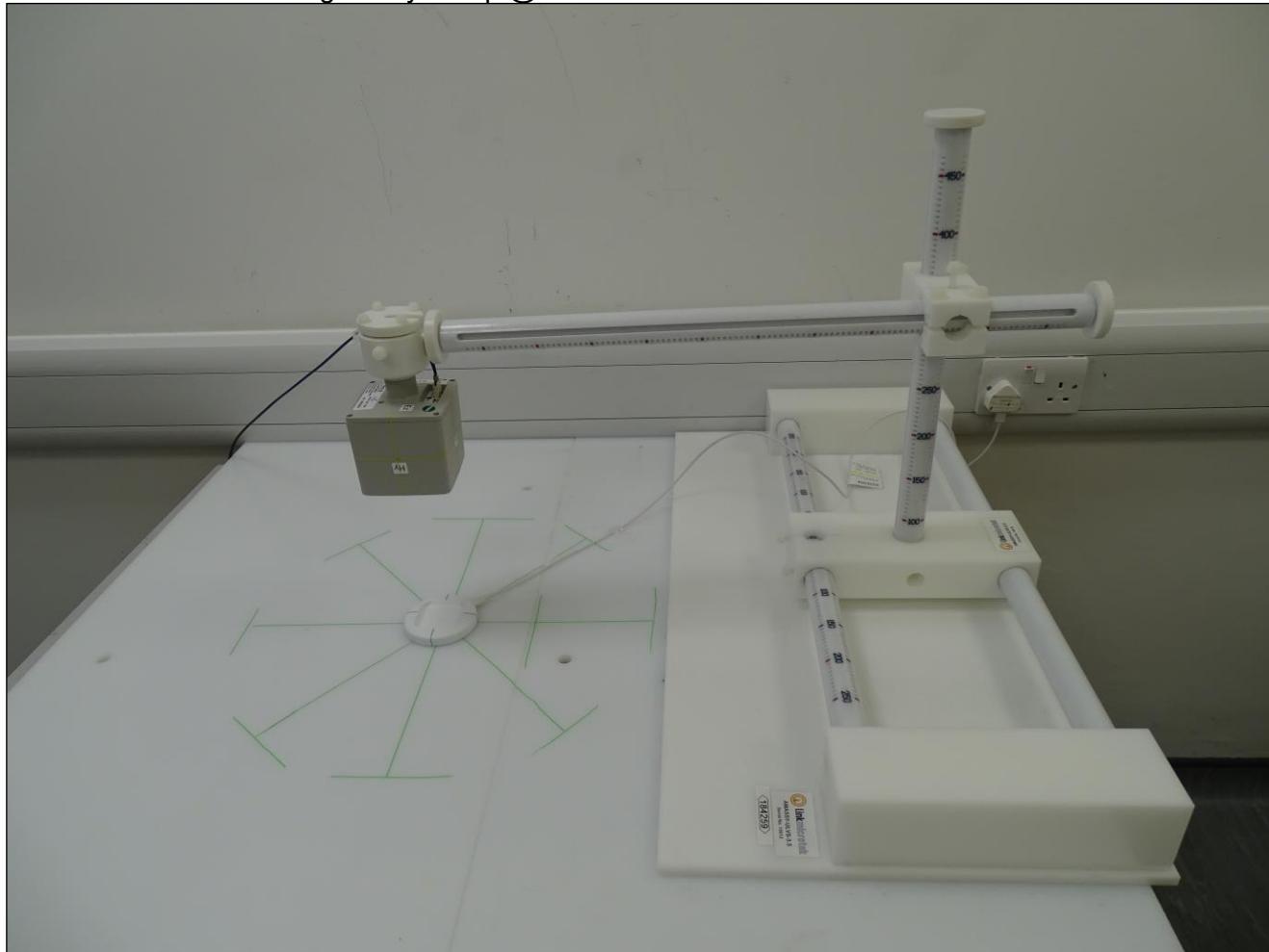
Cases	Configuration	Separation Distance (cm)	Measurement Time	E-Field Measurement (V/m)	Plot No.
1	Top	20	6 mins	1.986	011
2	Side 6	20	6 mins	1.190	012

7. Appendixes

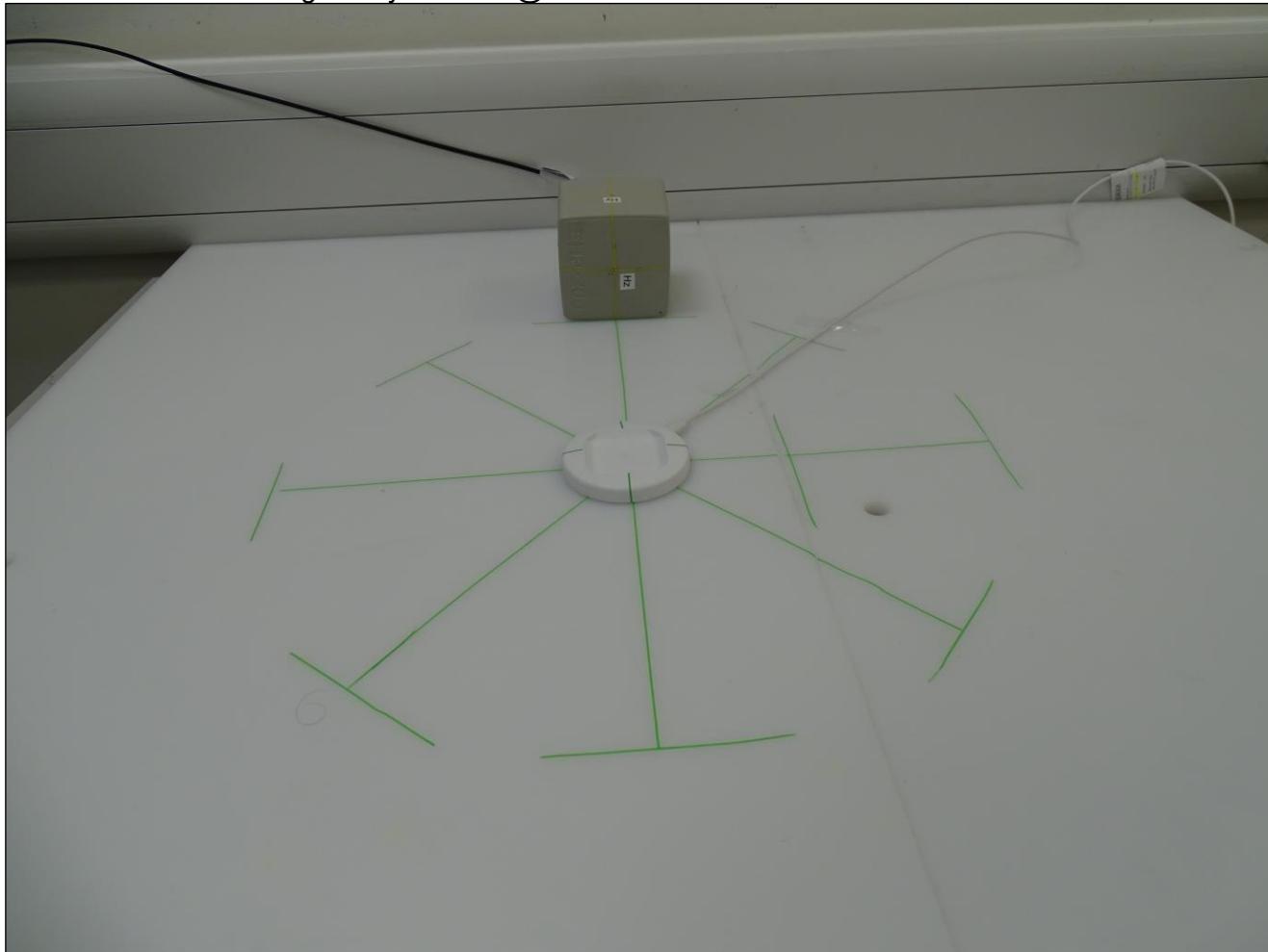
7.1. Photographs E&H-field

Photograph Reference Number	Title
PHT/001	H- Field - Charger only – Top @20cm
PHT/002	H- Field Charger only -Side 6 @20cm
PHT/003	H- Field - On charge - Top @20cm
PHT/004	H- Field - On charge - Side 7 @20cm
PHT/005	H- Field - On charge with speaker on – Top @20cm
PHT/006	H- Field - On charge with speaker on - Side 1 @20cm
PHT/007	E-Field - Charger only – Top @20cm
PHT/008	E-Field - Charger only - Side 6 @20cm
PHT/009	E-Field - On charge – Top @20cm
PHT/010	E-Field - On charge - Side 1 @20cm
PHT/011	E-Field - On charge with speaker on – Top @20cm
PHT/012	E-Field - On charge with speaker on - Side 6 @20cm

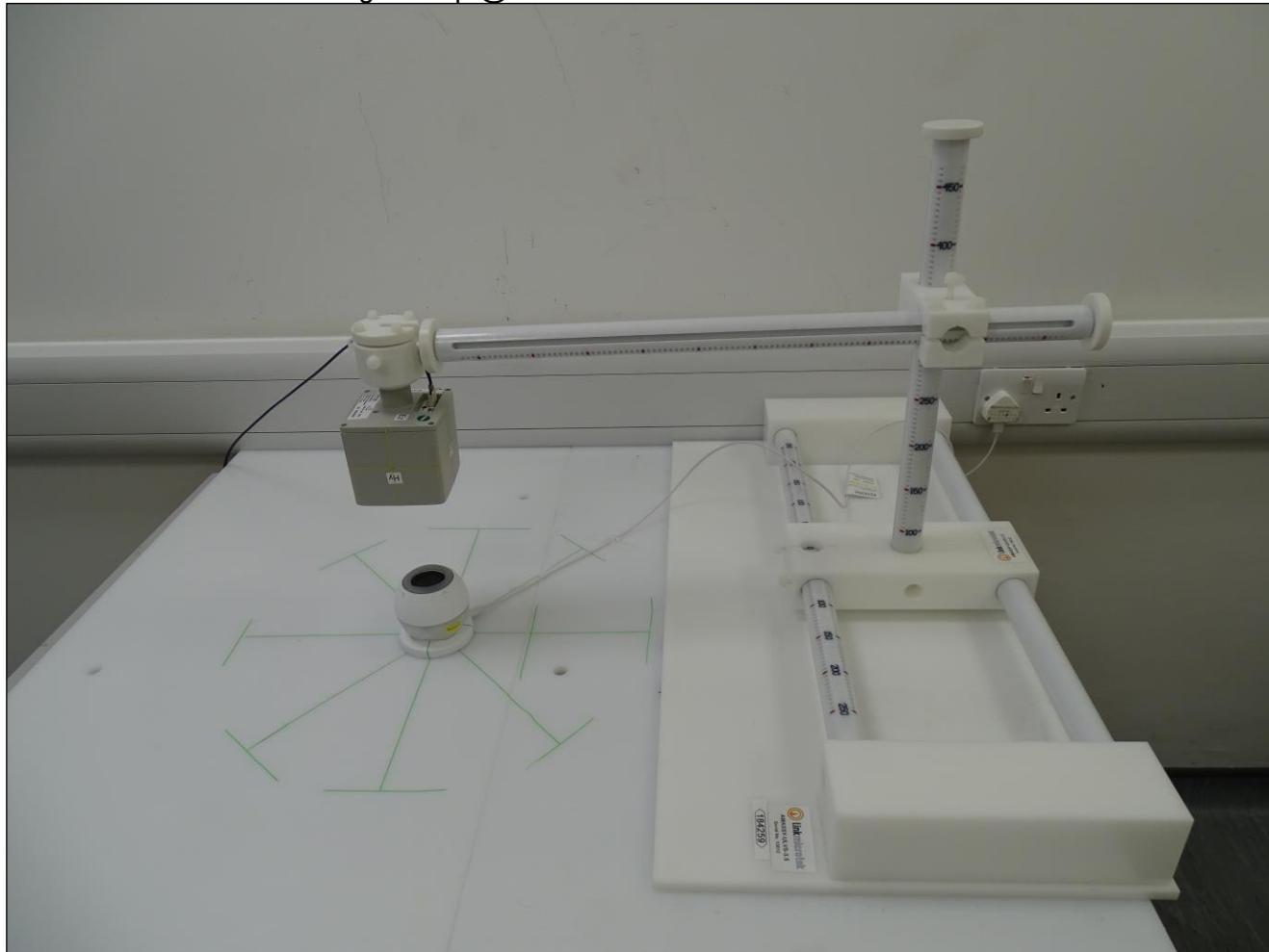
PHT/001: H- Field - Charger only – Top @20cm



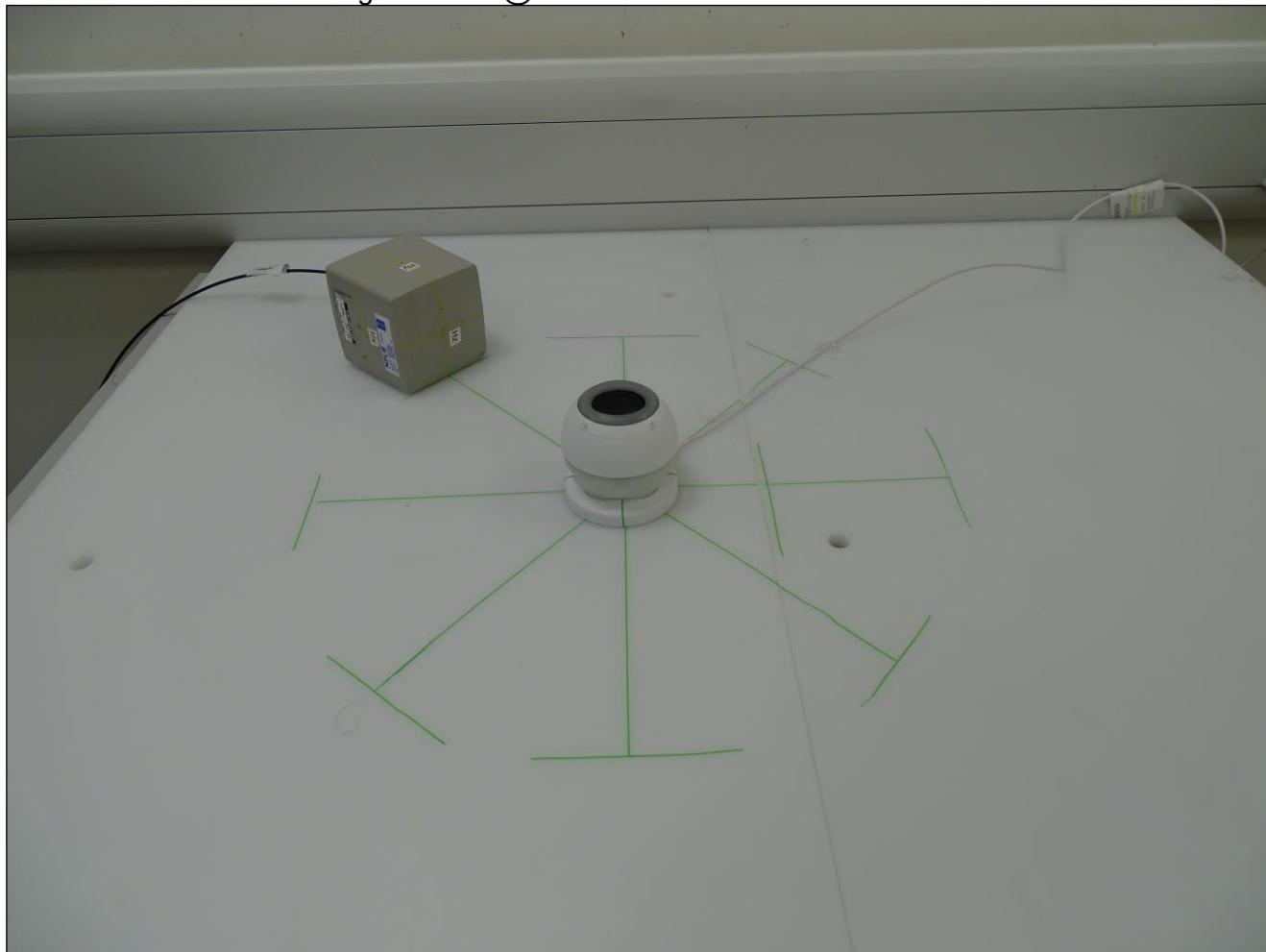
PHT/002: H- Field Charger only - Side 6 @20cm



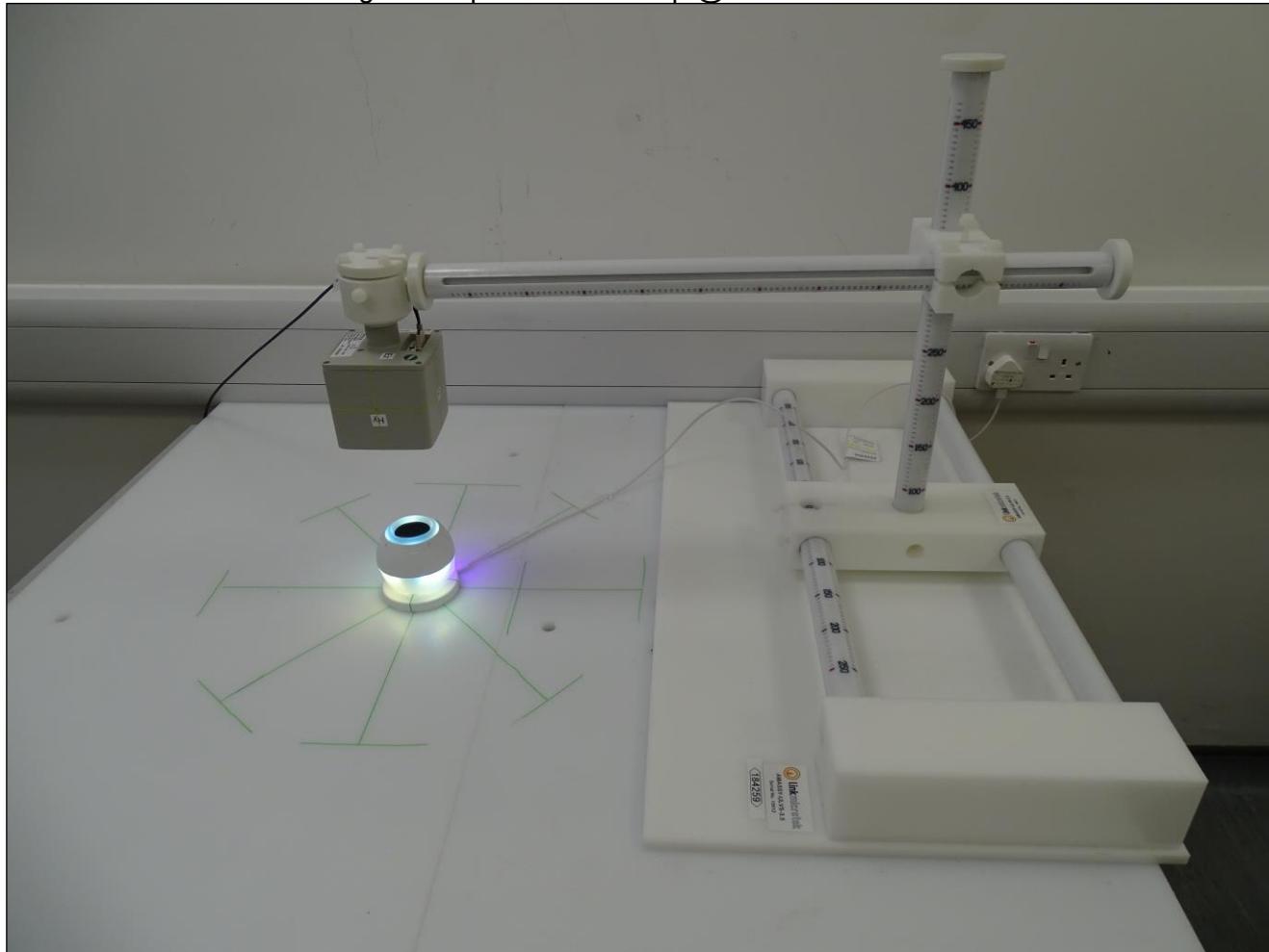
PHT/003: H- Field - On charge – Top @20cm



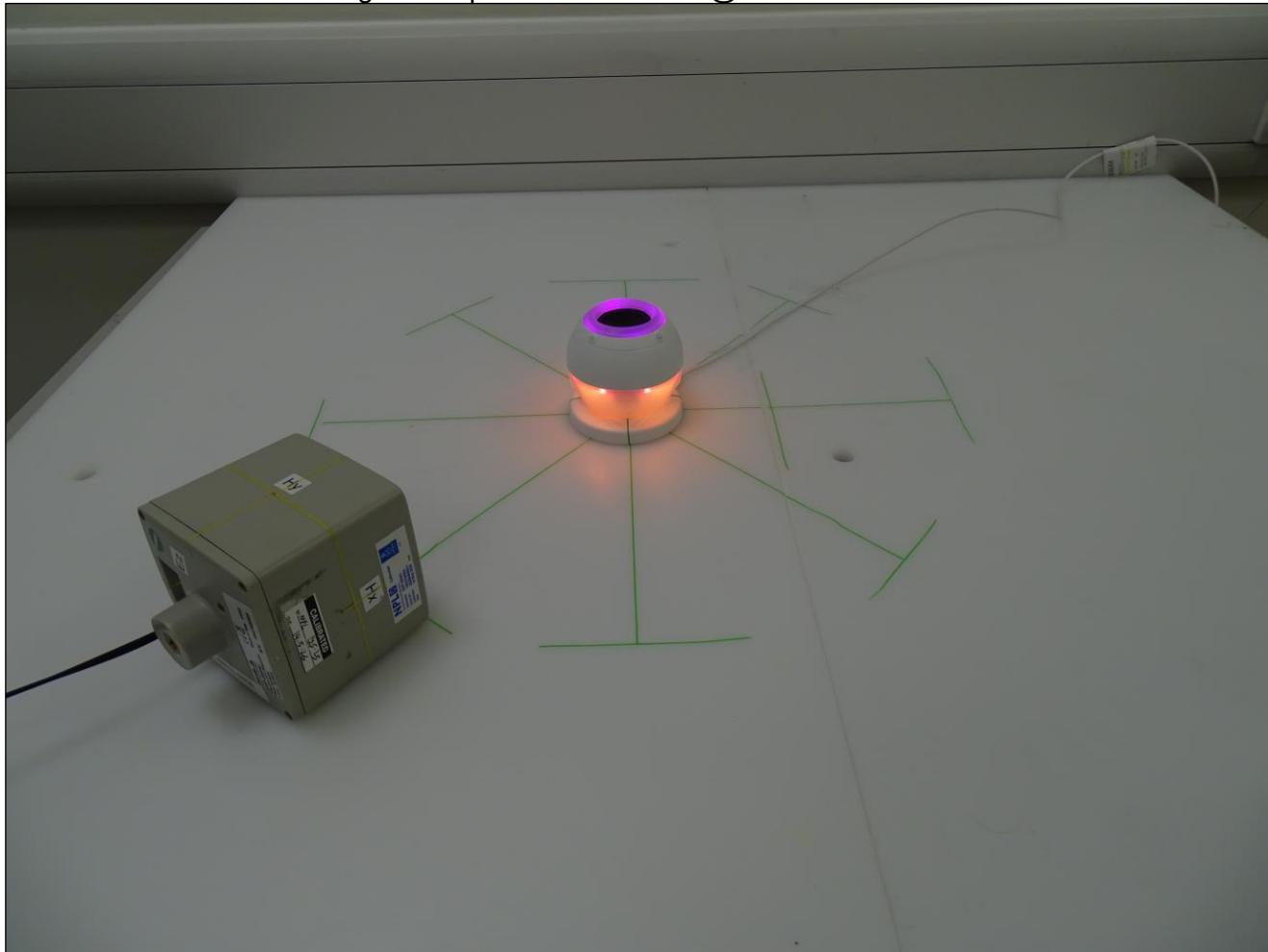
PHT/004: H- Field - On charge - Side 7 @20cm



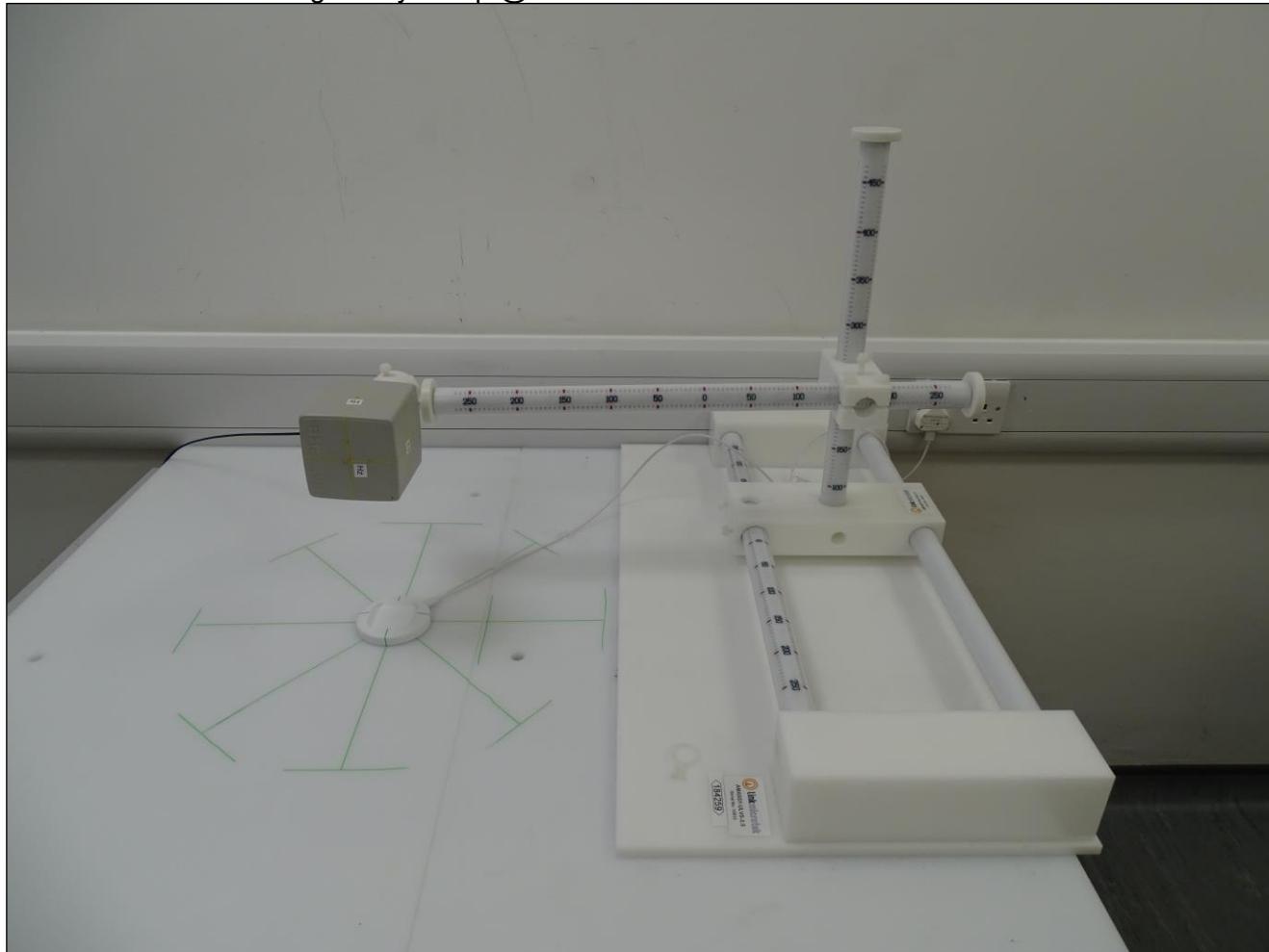
PHT/005: H- Field - On charge with speaker ON – Top @20cm



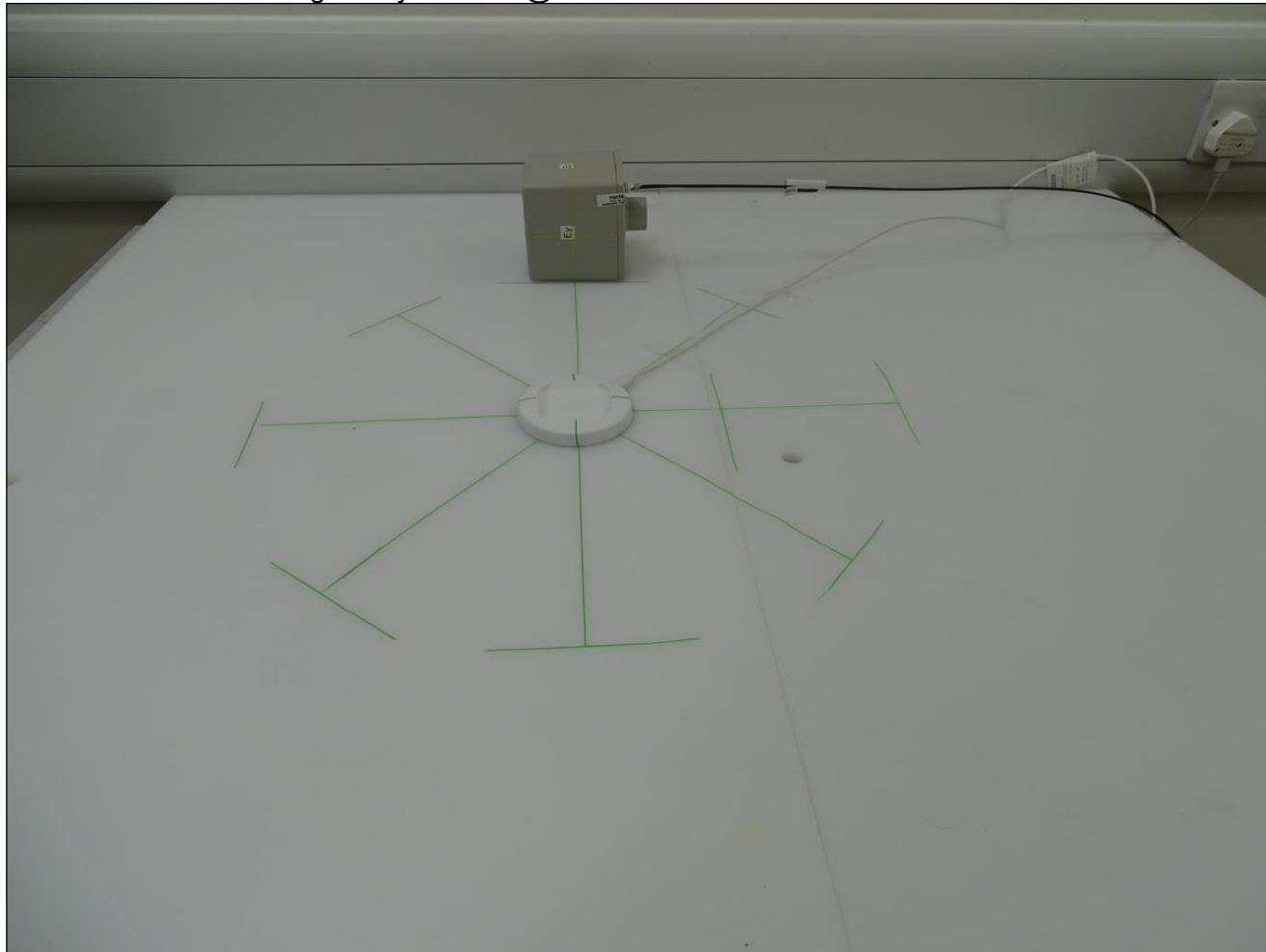
PHT/006: H- Field - On charge with speaker on - Side 1 @20cm



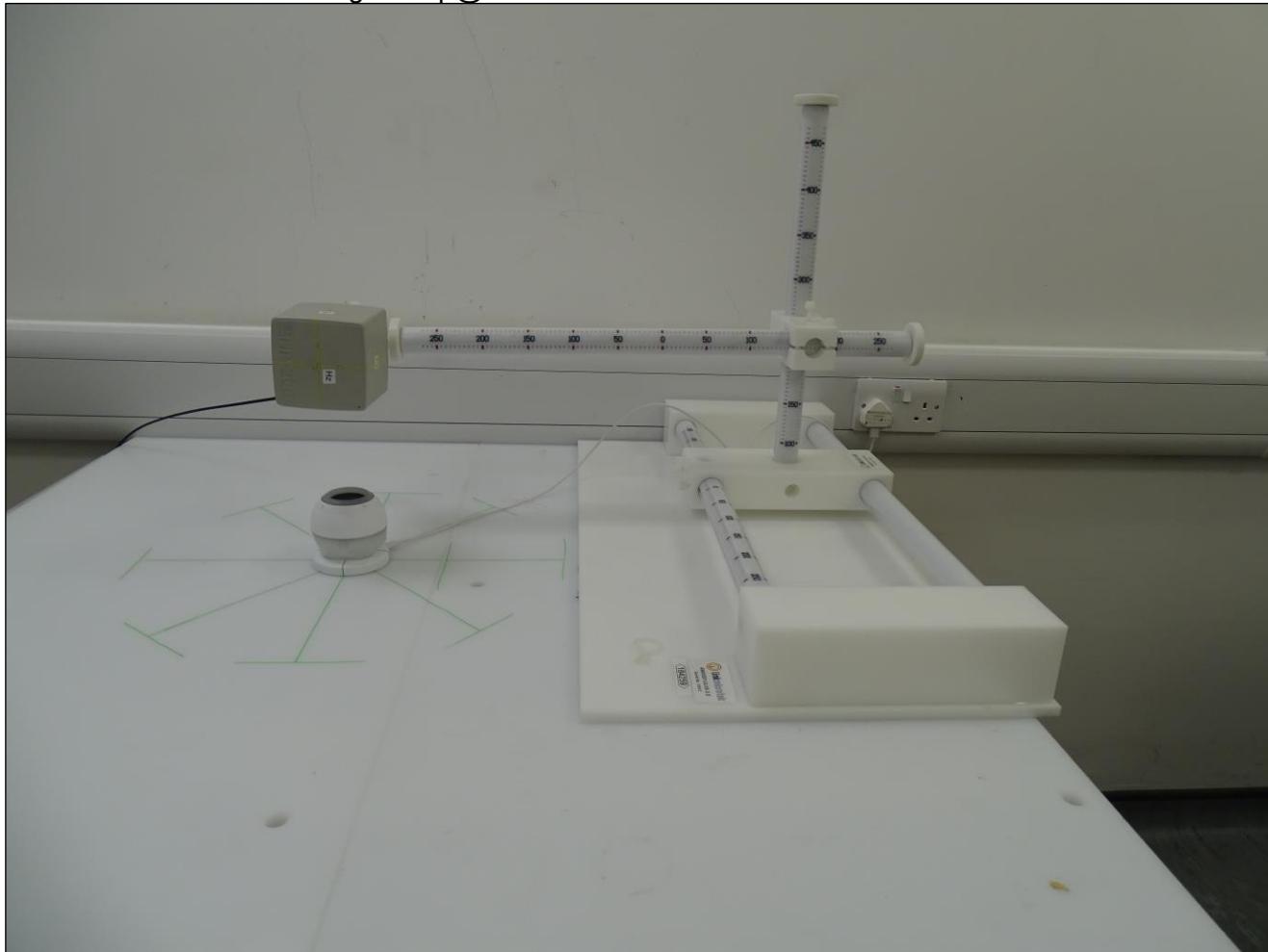
PHT/007: E-Field - Charger only – Top @20cm



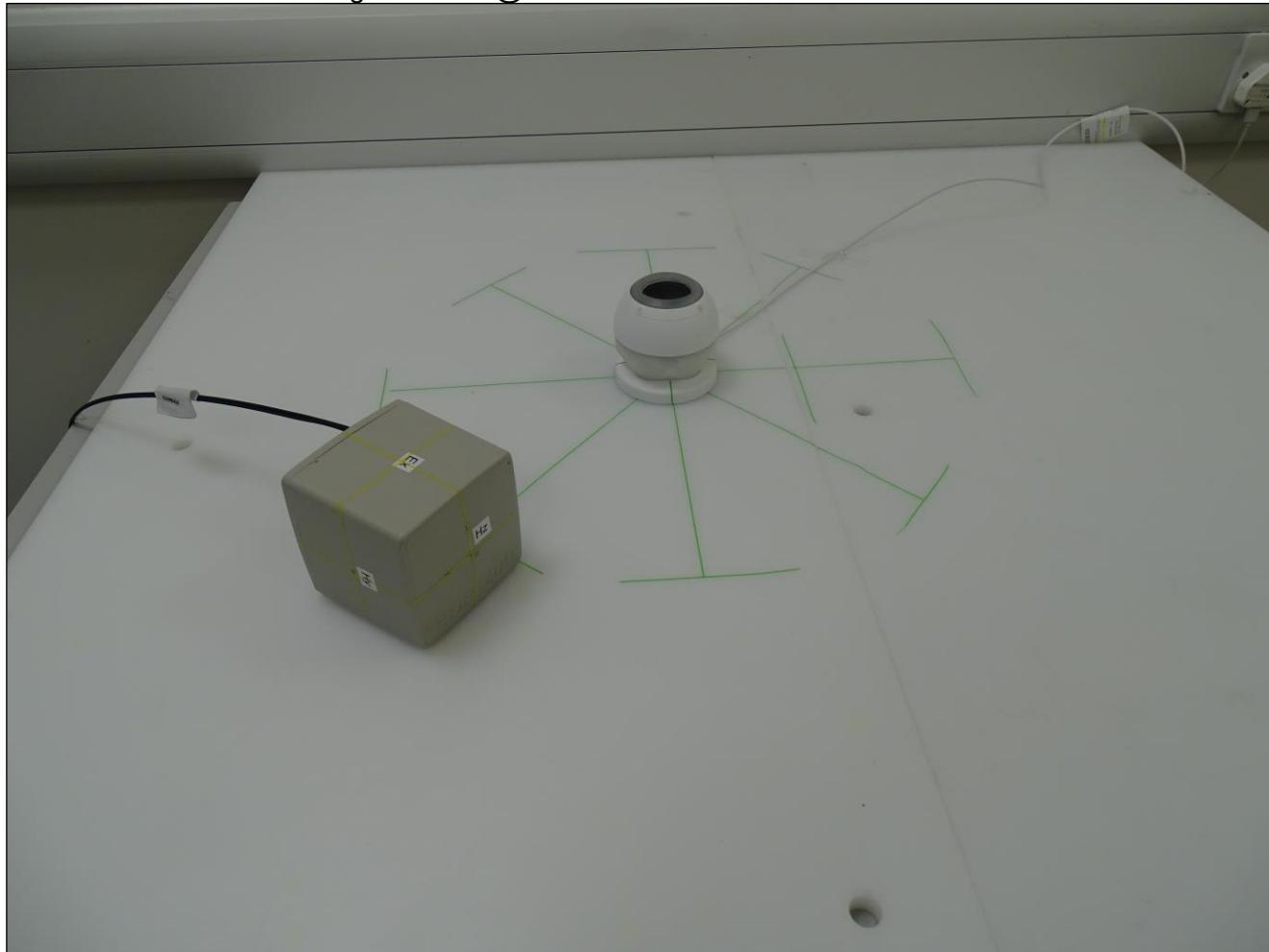
PHT/008: E-Field - Charger only - Side 6 @20cm



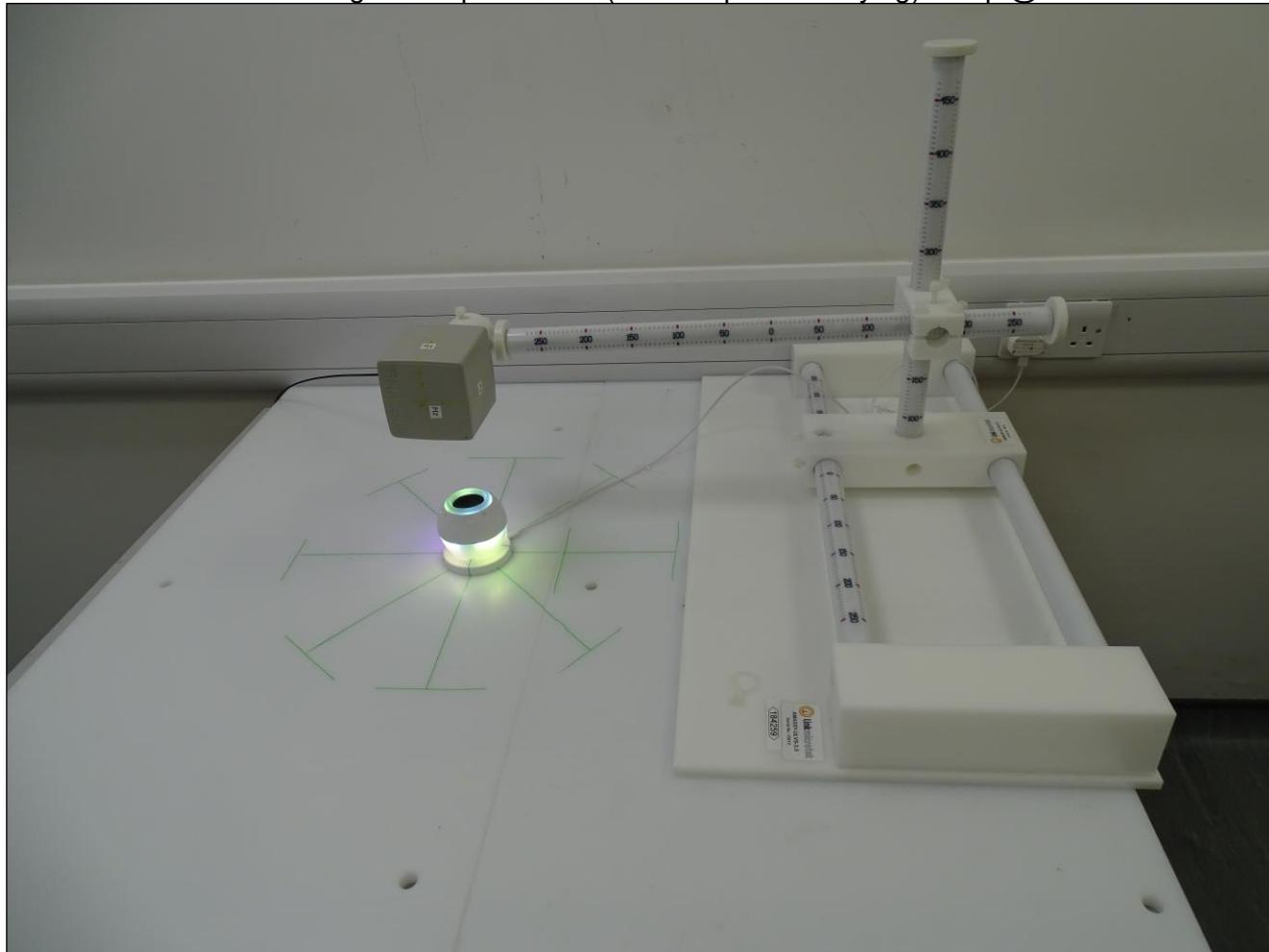
PHT/009: E-Field - On charge - Top@20cm



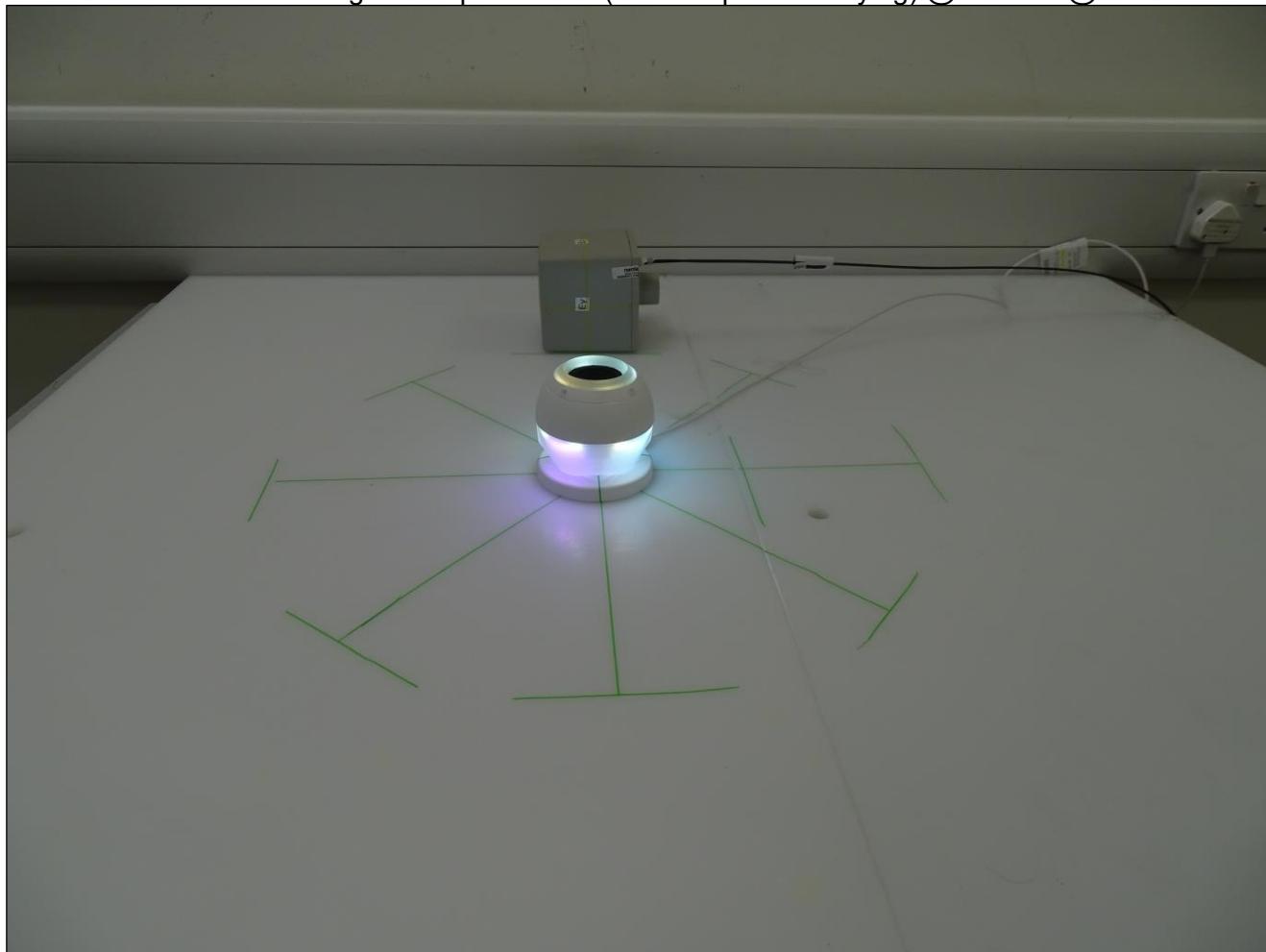
PHT/010: E-Field - On charge - Side 1 @20cm



PHT/011: E-Field - On charge with speaker ON (DUT + Speaker Playing) – Top @20cm



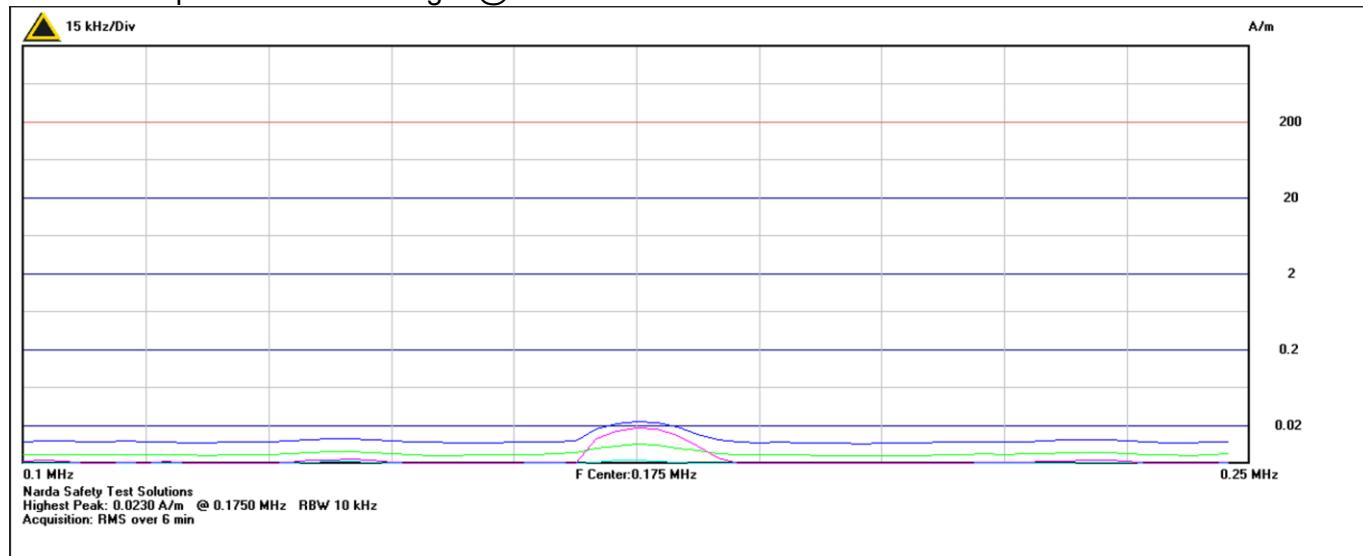
PHT/012: E-Field - On charge with speaker ON (DUT + Speaker Playing) @ - Side 6 @20cm



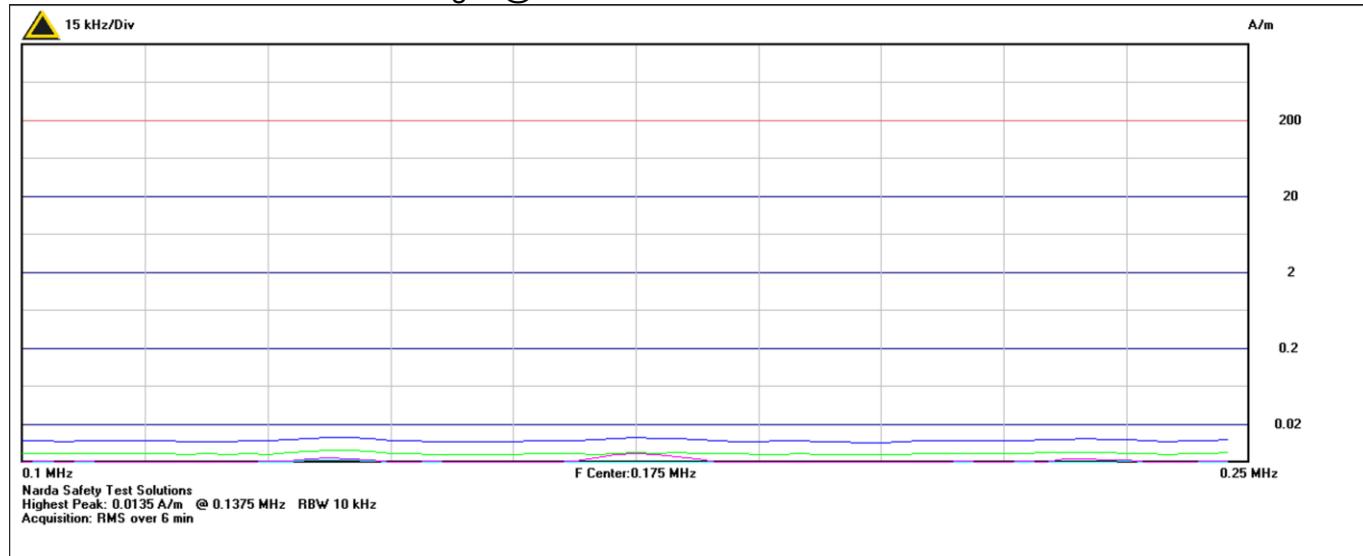
7.2. Measurement Plots

Photograph Reference Number	Title
PHT/001	Top H-Field with Charger @20cm
PHT/002	Side6 H-Field with Charger @20cm
PHT/003	Top H-Field with On Charging (DUT + Speaker) @20cm
PHT/004	Side7 H-Field with On Charging (DUT + Speaker) @20cm
PHT/005	Top H-Field with On Charge with Speaker ON (DUT + Speaker) @20cm
PHT/006	Side1 H-Field with On Charge with Speaker ON (DUT + Speaker) @20cm
PHT/007	Top E-Field with Charger @20cm
PHT/008	Side6 E-Field with Charger @20cm
PHT/009	Top E-Field with On Charging (DUT + Speaker) @20cm
PHT/010	Side1 E-Field with On Charging (DUT + Speaker) @20cm
PHT/011	Top E-Field with On charge with Speaker ON (DUT + Speaker Playing) @20cm
PHT/012	Side6 E-Field with On charge with Speaker ON (DUT + Speaker Playing) @20cm

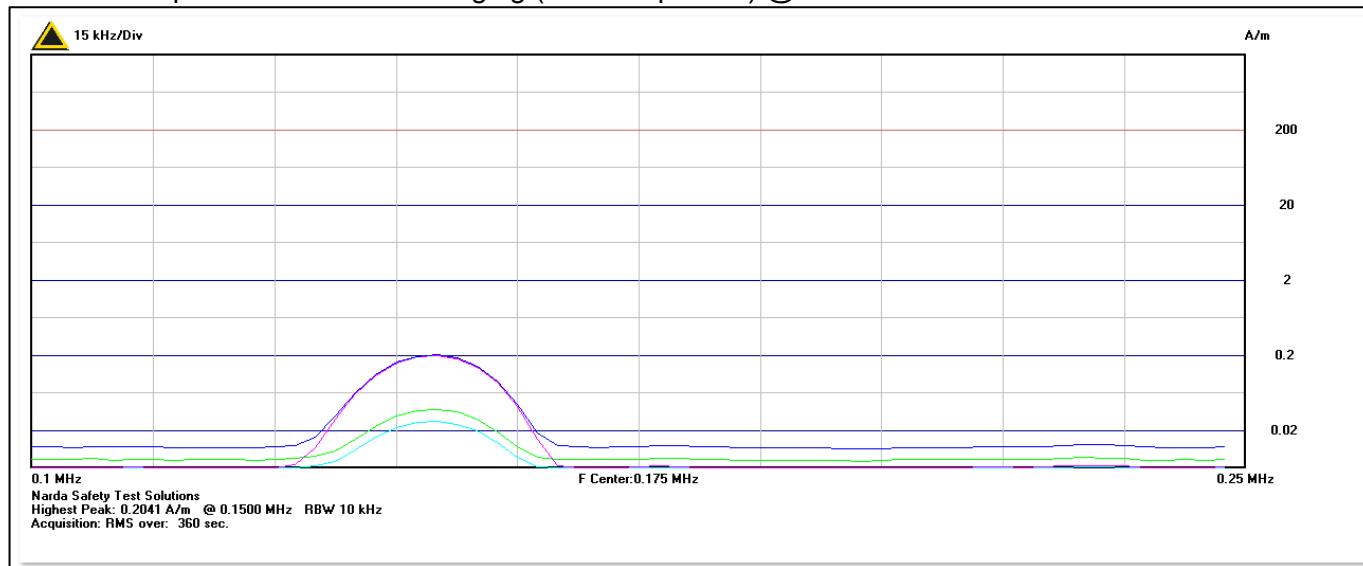
PHT/001: Top H-Field with Charger @20cm



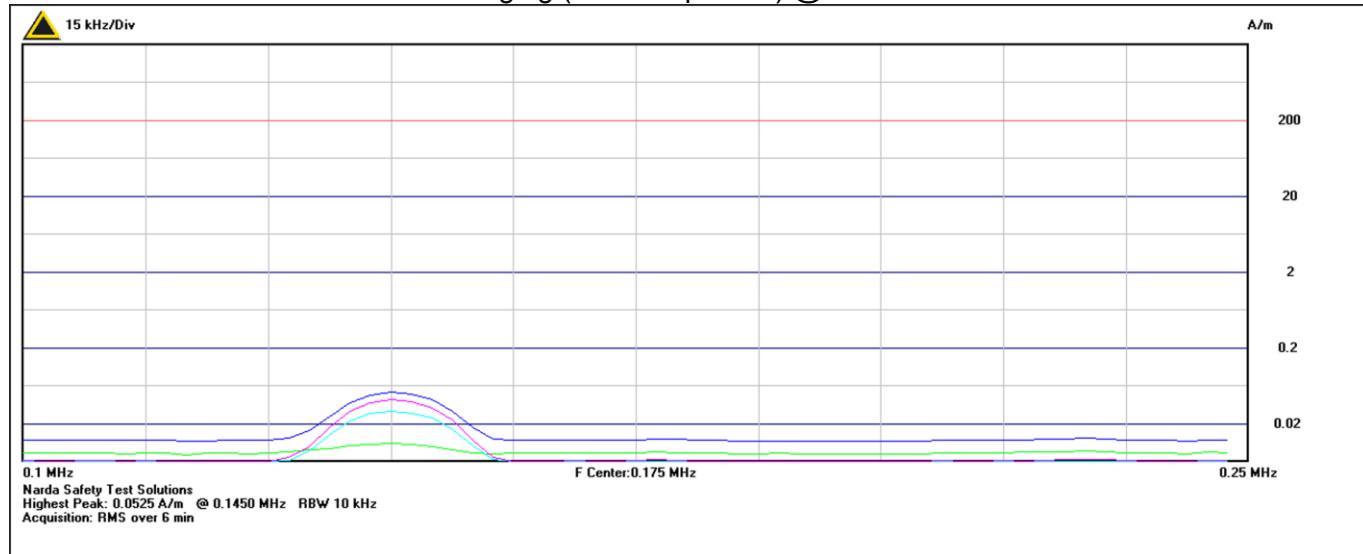
PHT/002: Side6 H-Field with Charger @20cm



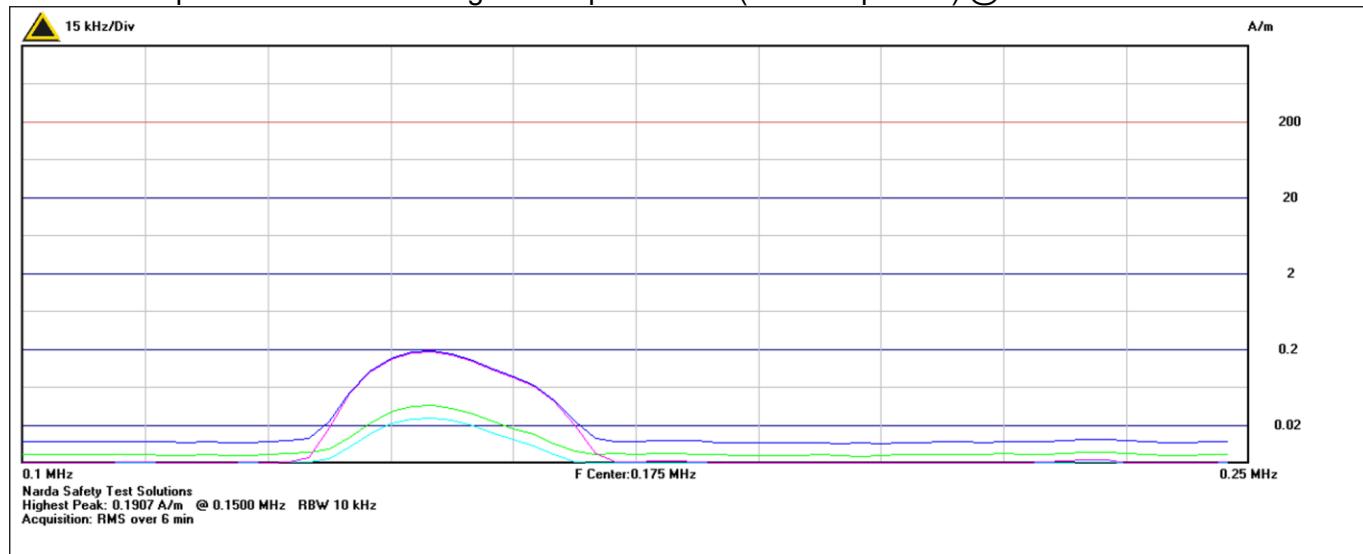
PHT/003: Top H-Field with On Charging (DUT + Speaker) @20cm



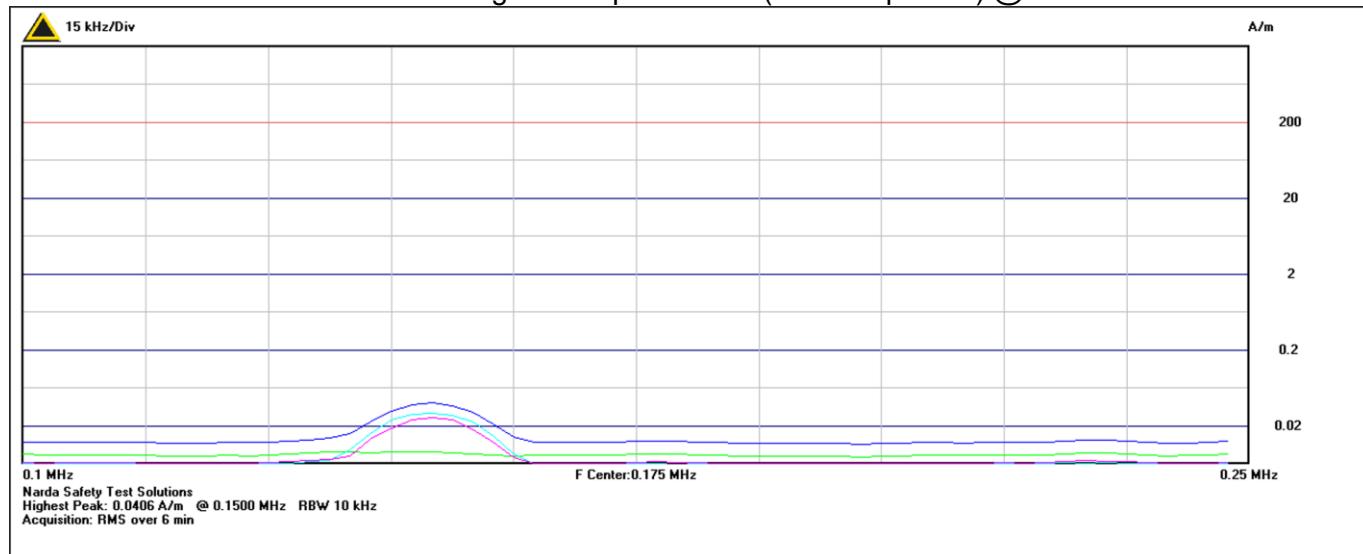
PHT/004: Side7 H-Field with On Charging (DUT + Speaker) @20cm



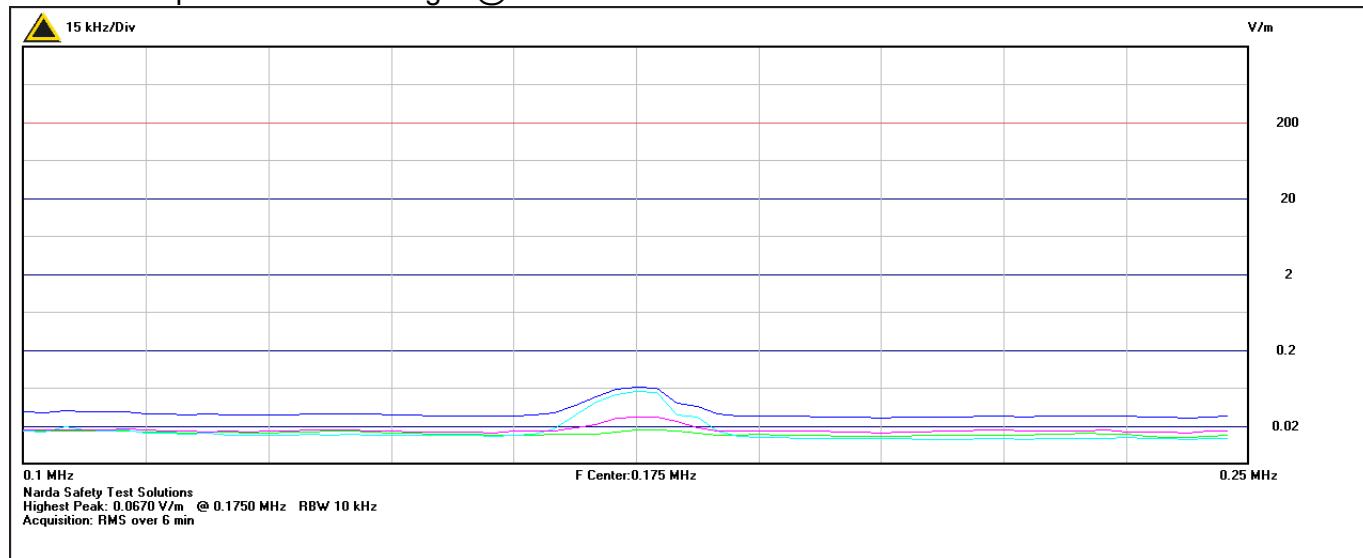
PHT/005: Top H-Field with on Charge with Speaker ON (DUT + Speaker) @20cm



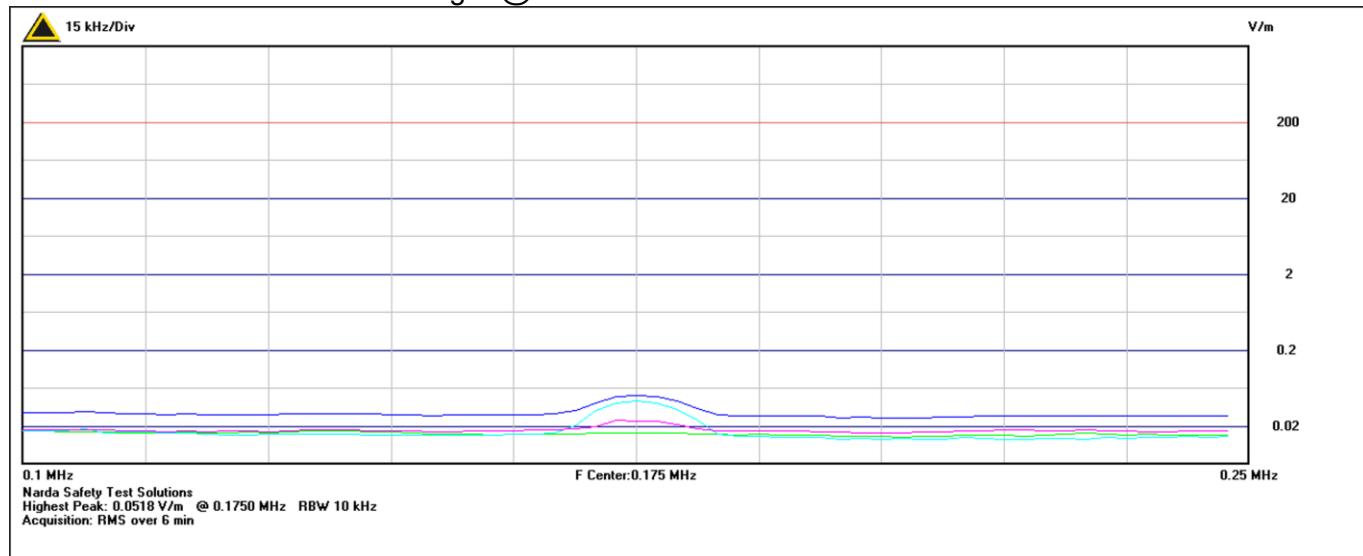
PHT/006: Side1 H-Field with on Charge with Speaker ON (DUT + Speaker) @20cm



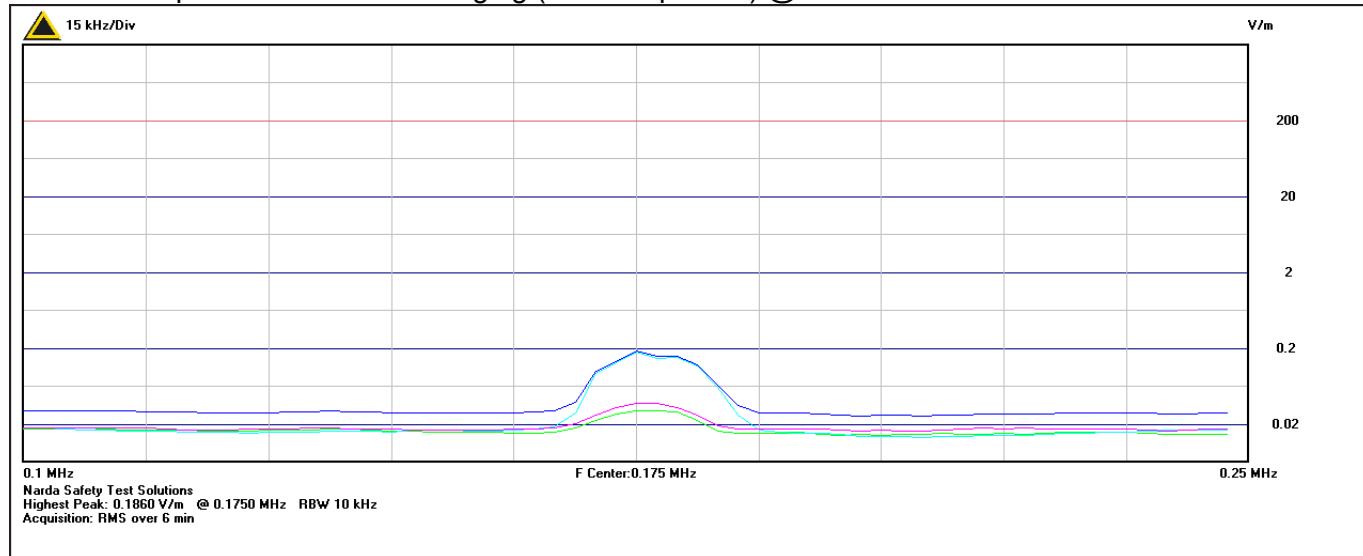
PHT/007: Top E-Field with Charger @30cm.BMP



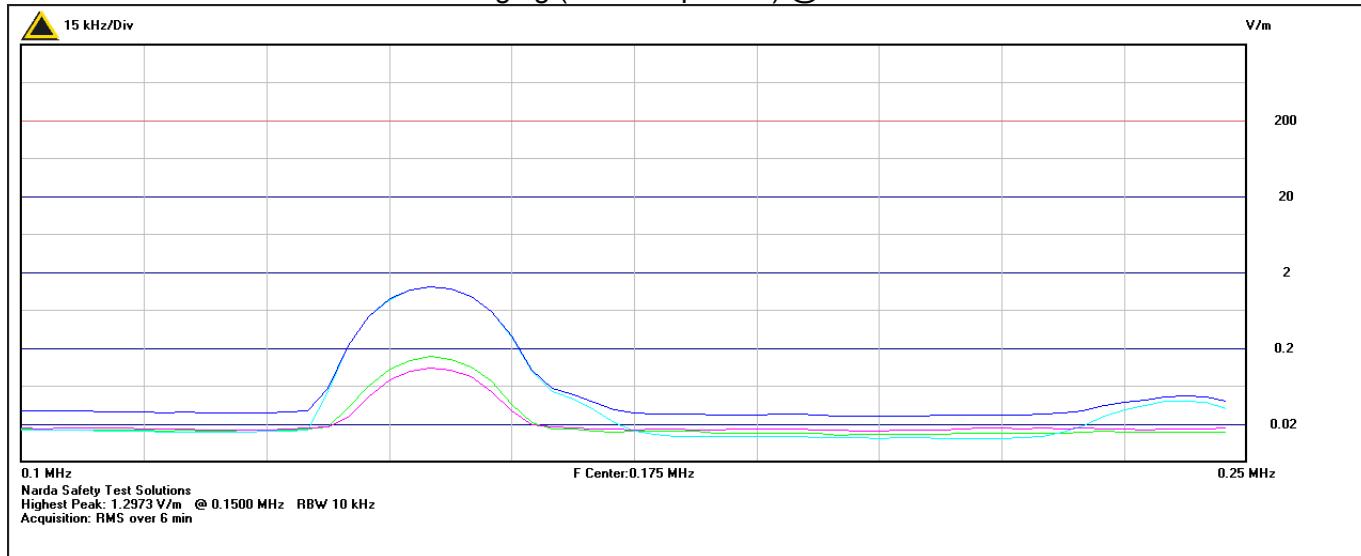
PHT/008: Side6 E-Field with Charger @20cm



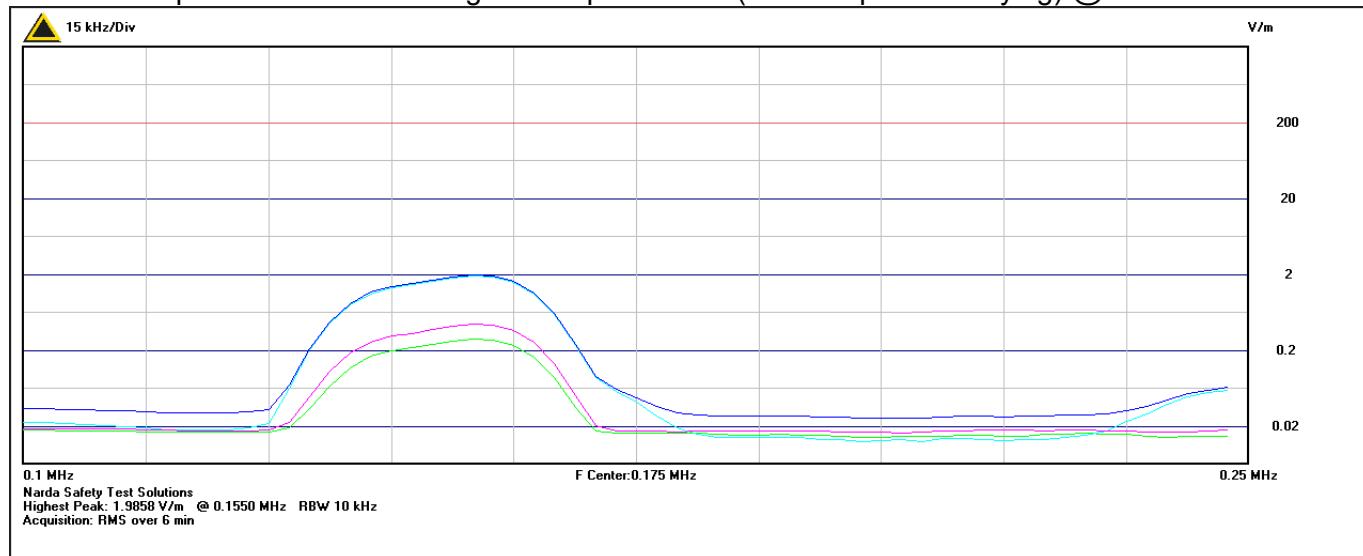
PHT/009: Top E-Field with On Charging (DUT + Speaker) @20cm



PHT/010: Side1 E-Field with On Charging (DUT + Speaker) @20cm



PHT/011: Top E-Field with On charge with Speaker ON (DUT + Speaker Playing) @ 20cm



PHT/012: Side6 E-Field with On charge with Speaker ON (DUT + Speaker Playing) @ 20cm

