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# Test Report

Report Number:

**F241001E8 2<sup>nd</sup> Version**

Equipment under Test (EUT):

**Einschub UI Fortis**

Applicant:

**Fronius International GmbH**

Manufacturer:

**Fronius International GmbH**



## References

- [1] **CFR 47 Rule part 1** Practice and Procedure
- [2] **CFR 47 Rule part 2** Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
- [3] **KDB 447498 D04 Interim General RF Exposure Guidance v01**

## Test Result

The requirements of the tests performed as shown in the overview (clause 4) were fulfilled by the equipment under test. The complete test results are presented in the following.

“Passed” indicates that the equipment under test conforms with the relevant limits of the testing standard without taking any measurement uncertainty into account. However, the measurement uncertainty is calculated and shown in this test report.

Evaluated and  
written by:

\_\_\_\_\_  
Signature

Reviewed and  
approved by:

\_\_\_\_\_  
Signature

**This test report is only valid in its original form.**

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The test results herein refer only to the tested sample. PHOENIX TESTLAB GmbH is not responsible for any generalisations or conclusions drawn from these test results concerning further samples. Any modification of the tested samples is prohibited and leads to the invalidity of this test report. Each page necessarily contains the PHOENIX TESTLAB Logo and the TEST REPORT NUMBER.

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## 1 Identification

### 1.1 Applicant

Name:	Fronius International GmbH
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Country:	Austria
Name for contact purposes:	Mr. Jan HERNDLER
Phone:	+43-7242-241-0
eMail address:	herndler.jan@fronius.com
Applicant represented during the test by the following person:	Mr. Jan Herndler

### 1.2 Manufacturer

Name:	Fronius International GmbH
Address:	Günter-Fronius-Straße 1, 4600 Wels-Thalheim
Country:	Austria
Name for contact purposes:	Mr. Jan HERNDLER
Phone:	+43-7242-241-0
eMail address:	herndler.jan@fronius.com
Applicant represented during the test by the following person:	Mr. Jan Herndler

### 1.3 Test Laboratory

The tests were carried out by:

**PHOENIX TESTLAB GmbH**  
**Königswinkel 10**  
**32825 Blomberg**  
**Germany**

accredited by Deutsche Akkreditierungsstelle GmbH (DAkkS) according to DIN EN ISO/IEC 17025:2018. The accreditation is only valid for the scope of accreditation listed in the annex of the certificate D-PL-17186-01-00. FCC Test Firm Designation Number DE0004, FCC Test Firm Registration Number 469623, CAB Identifier DE0003 and ISED# 3469A.

## 1.4 EUT (Equipment under Test)

Test object: *	User Interface for welding machines
Model name: *	Einschub UI Fortis
Model number: *	43,0001,1753
Order number: *	NA
FCC ID: *	QKWACU1
IC certification number: *	12270A-ACU1
PMN: *	Einschub UI Fortis
HVIN: *	V0.5A_C
FVIN: *	N/A

	EUT number		
	1	2	3
Serial number: *	None (marked as "Sample 1")	-	-
PCB identifier: *	ACU1/ V0.5A_C & ENCO3/ V0.4A_A	-	-
Hardware version: *	V0.5A_C	-	-
Software version: *	MML_1.1.0-36571.40861-RD	-	-

\* Declared by the applicant

One EUT was used for all tests.

Note: PHOENIX TESTLAB GmbH does not take samples. The samples used for tests are provided exclusively by the applicant.

## 1.5 Technical Data of Equipment

General EUT data			
Power supply EUT: *	DC		
Supply voltage EUT: *	$U_{\text{nom}} = 24 \text{ V}_{\text{DC}}$	$U_{\text{min}} = 21.6 \text{ V}_{\text{DC}}$	$U_{\text{max}} = 26.4 \text{ V}_{\text{DC}}$
Temperature range: *	$-20^{\circ}\text{C}$ to $+65^{\circ}\text{C}$		
Lowest / highest internal clock frequency: *	20 kHz / 2480 MHz		

IEEE 802.11 frequencies			
20 MHz		40 MHz	
Channel 1	2412 MHz	-	-
Channel 2	2417 MHz	-	-
Channel 3	2422 MHz	Channel 3	2422 MHz
Channel 4	2427 MHz	Channel 4	2427 MHz
Channel 5	2432 MHz	Channel 5	2432 MHz
Channel 6	2437 MHz	Channel 6	2437 MHz
Channel 7	2442 MHz	Channel 7	2442 MHz
Channel 8	2447 MHz	Channel 8	2447 MHz
Channel 9	2452 MHz	Channel 9	2452 MHz
Channel 10	2457 MHz	-	-
Channel 11	2462 MHz	-	-

Bluetooth® low energy frequencies			
Channel 00	2402 MHz	Channel 01	2404 MHz
Channel 02	2406 MHz	Channel 03	2408 MHz
...	...	...	...
...	...	...	...
Channel 18	2438 MHz	Channel 19	2440 MHz
...	...	...	...
...	...	...	...
Channel 36	2474 MHz	Channel 37	2476 MHz
Channel 38	2478 MHz	Channel 39	2480 MHz

IEEE 802.11 radio mode					
Fulfils radio specification: *1	IEEE 802.11 b IEEE 802.11 g IEEE 802.11 n (20 MHz) IEEE 802.11 n (40 MHz)				
Radio chip: *1	u-blox MAYA W166				
Antenna type: *1	Dipole antenna				
Antenna name: *1	Taoglas FXP831				
Antenna gain: *2	Peak: +3.28 dBi Average: -2.44 dBi				
Antenna connector: *1	UFL				
Supply voltage WLAN module: *1	U <sub>nom</sub> =	3.3 V <sub>DC</sub>	U <sub>min</sub> =	3.14 V <sub>DC</sub>	U <sub>max</sub> =
Type of modulation: *1	IEEE 802.11b	DSSS (1 Mbps DSSS (2 Mbps DSSS (5.5/11 Mbps			DBPSK) DQPSK) CCK)
	IEEE 802.11g	OFDM (6/9 Mbps OFDM (12 / 18 Mbps OFDM (24/36 Mbps OFDM (48/54 Mbps			BPSK) QPSK) 16-QAM) 64-QAM)
	IEEE 802.11n 20 MHz (SISO 1x1:1)	MCS0 MCS1/2 MCS3/4 MCS5/6/7	OFDM (7 Mbps OFDM (14 – 22 Mbps OFDM (28 – 43 Mbps OFDM (58 - 72 Mbps		BPSK) QPSK) 16-QAM) 64-QAM)
	IEEE 802.11n 40 MHz (SISO 1x1:1)	MCS0 MCS1/2 MCS3/4 MCS5/6/7	OFDM (15 Mbps OFDM (30 / 45 Mbps OFDM (60 – 90 Mbps OFDM (120 - 150Mbps		BPSK) QPSK) 16-QAM) 64-QAM)
Operating frequency range: *1	IEEE 802.11b			2412 – 2462 MHz	
	IEEE 802.11g			2412 – 2462 MHz	
	IEEE 802.11n 20 MHz			2412 – 2462 MHz	
	IEEE 802.11n 40 MHz			2422 – 2452 MHz	
Number of channels: *1	IEEE 802.11b			11 (5 MHz channel spacing)	
	IEEE 802.11g			11 (5 MHz channel spacing)	
	IEEE 802.11n 20 MHz			11 (5 MHz channel spacing)	
	IEEE 802.11n 40 MHz			9 (5 MHz channel spacing)	

\*1 declared by the applicant

\*2 according to the document "FXP831.07.0100C" from Taoglas antenna solution provided by the applicant

Bluetooth® low energy radio mode	
Fulfils radio specification: *1	Bluetooth® low energy (BLE) 5.2
Radio chip: *1	u-blox MAYA-W166
Antenna type: *1	Dipole antenna
Antenna name: *1	Taoglas FXP831
Antenna gain: *2	Peak: +3.28 dBi Average: -2.44 dBi
Antenna connector: *1	UFL
Supply voltage BLE module: *1	U <sub>nom</sub> = 3.3 V <sub>DC</sub> U <sub>min</sub> = 3.14 V <sub>DC</sub> U <sub>max</sub> = 3.46 V <sub>DC</sub>
Type of modulation: *1	BLE (1 Mbps PHY) GFSK
	BLE (2 Mbps PHY) GFSK
	BLE (500 kbps coded PHY) GFSK
	BLE (125 kbps coded PHY) GFSK
Operating frequency range: *1	BLE (1 Mbps PHY) 2402 – 2480 MHz
	BLE (2 Mbps PHY) 2402 – 2480 MHz
	BLE (500 kbps coded PHY) 2402 – 2480 MHz
	BLE (125 kbps coded PHY) 2402 – 2480 MHz
Number of channels: *1	BLE (1 Mbps PHY) 40 (2 MHz channel spacing)
	BLE (2 Mbps PHY) 40 (2 MHz channel spacing)
	BLE (500 kbps coded PHY) 40 (2 MHz channel spacing)
	BLE (125 kbps coded PHY) 40 (2 MHz channel spacing)

\*1 declared by the applicant

\*2 according to the document "FXP832.03.0458D" from Taoglas antenna solution provided by the applicant

## 1.6 Dates

Date of receipt of test sample:	04.12.2024
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## 2 Evaluation Method

### 2.1 RF exposure test exemptions for single sources

#### 2.1.1 General Exemption CFR 47 §1.1307(b)(3)(i)(A)

The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

#### 2.1.2 SAR Based Exemption CFR 47 §1.1307(b)(3)(i)(B)

The available maximum time-averaged power of effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz inclusive.

For the following separation distances [d] and frequency ranges  $P_{th}$  is given by the following formulas

	0.5 cm ≤ d ≤ 20cm	20 cm < d ≤ 40 cm
0.2 GHz ≤ f < 1.5 GHz	$P_{th}(mW) = ERP_{20cm} \left( \frac{d}{20} \right)^x$ $ERP_{20cm} (mW) = 2040f$ $x = -\log_{10} \left( \frac{60}{ERP_{20cm}\sqrt{f}} \right)$	$P_{th}(mW) = ERP_{20cm}$ $ERP_{20cm} (mW) = 2040f$
1.5 GHz ≤ f ≤ 6 GHz	$P_{th}(mW) = ERP_{20cm} \left( \frac{d}{20} \right)^x$ $ERP_{20cm} (mW) = 3060$ $x = -\log_{10} \left( \frac{60}{ERP_{20cm}\sqrt{f}} \right)$	$P_{th}(mW) = ERP_{20cm}$ $ERP_{20cm} (mW) = 3060$

Relaxation for extremities according to 2.1.1 [3]

Finally, when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

### 2.1.3 MPE Based Exemption CFR 47 §1.1307(b)(3)(i)(C)

By using Table 1 and the minimum separation distance (d in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, d must be at least  $\lambda/2\pi$ , where  $\lambda$  is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP 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 (1.64 linear value).

RF Source frequency [MHz]	Threshold ERP [W]
0.3 - 1.34	1920 d <sup>2</sup>
1.34 – 30	3450 d <sup>2</sup> /f <sup>2</sup>
30 – 300	3.83 d <sup>2</sup>
300 – 1500	0.0128 d <sup>2</sup> /f
1500 - 100000	19.2 d <sup>2</sup>

d: Minimal separation distance from antenna to the user

### 2.1.4 Stand alone MPE evaluation limits

The human exposure to RF emissions from such devices could be evaluated based on the MPE limits adopted by the FCC for electric and magnetic field strength and / or power density. The limits for General Population / Uncontrolled Exposure are given in the following table from CFR 47 §1.1310(e)(1):

Frequency range [MHz]	Electric field strength (E) [V/m]	Magnetic field strength (H) [A/m]	Power density (S) [mW/cm <sup>2</sup> ]	Averaging time [min]
(i) Limits for Occupational/Controlled Exposure				
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
(ii) 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 <sup>2</sup> )	<30
30 – 300	27.5	0.073	0.2	<30
300 – 1500			f/1500	<30
1500 – 100,000			1.0	<30

Note: f = frequency in MHz; \* Plane – wave equivalent power density

The power density is calculated as follows:

$$S = \frac{P \cdot G \cdot D}{4 \cdot \pi \cdot d^2}$$

Where:

P: conducted power

G: Antenna gain (linear)

D: Duty Cycle

d: Minimal separation distance from antenna to the user

## 2.2 RF exposure test exemptions for simultaneous transmission sources

### 2.2.1 1 mW Test Exemption for simultaneous transmission sources

As discussed in CFR 47 §1.1307(b)(3)(ii)(A) [1] the 1 mW exemption intended for single transmitters may be also applied to simultaneous transmission conditions, within the same host device, according one of the following criteria:

- a. When the maximum available power each individual transmitting antenna with the same time averaging period is  $\leq 1$  mW, and the nearest parts of the antenna structures of the simultaneously operating transmitters are separated by at least 2 cm
- b. When the aggregate maximum available power of all transmitting antennas is  $\leq 1$  mW in the same time-averaging period

This exemption may not be combined with any other exemption.

### 2.2.2 Simultaneous transmission SAR based and MPE based test exemptions

Although this is not a module integration in the sense of product approval, the procedure for simultaneous transmission specified in KDB 447498 D04 Interim General RF Exposure Guidance v01 [3] in chapter 2.2 was taken into account:

According to the RF exposure KDB 447498 D04 General RF Exposure Guidance v01 [3] in chapter 2.2.2: This case is described in detail in CFR 47 §1.1307(b)(3)(ii)(B) and covers the situations where both SAR-based and MPE-based exemption may be considered for test exemption in fixed, mobile, or portable device exposure conditions. For these cases, a device with multiple RF sources transmitting simultaneously will be considered an RF exempt device if the condition of the following formular is satisfied.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{i=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure\ Limit_k} \leq 1$$

For these test exemptions to apply, the maximum output power, duty factor, and other applicable parameters used in the standalone ERP determination tests, must be the same, or corresponding to a more conservative choice, than those required for simultaneous transmission.

Simultaneous transmission MPE test exclusion applies when the sum of the MPE ratios for all simultaneously transmitting antennas incorporated in a host device is  $\leq 1.0$ , according to calculated/estimated, numerically modelled, or measured field strengths or power density. The MPE ratio of each antenna is determined at the minimum test separation distance required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to the MPE limit at the test frequency.

### 2.2.3 Test exemption based on the SAR to Peak Location Separation Ratio

When the ERP-based condition in the previous section does not apply, a test exemption may be still applicable based on the SAR to peak location separation ratio (SPLSR) procedure.

In this case, the simultaneously transmitting antennas in each operating mode and exposure condition combination must be considered one pair at a time to determine the SPLSR that qualifies for the additional test exemption.

This ratio is defined as:

$$SPLSR = (SAR_1 + SAR_2)^{\frac{1.5}{R_i}}$$

Where:  $SAR_1$  and  $SAR_2$  = highest reported SAR or estimated SAR values for the two sources in the pair  $i$ , and  $R_i$  is their distance in mm.

When  $SPLSR \leq 0.0.4$  (rounded to two decimal digits), for all antenna pairs in the configuration, then the device qualifies for 1 g SAR test exemption.

When 10 g SAR applies (e.g. for extremities) the corresponding test exemption condition is  $SPLSR \leq 0.10$ .

If any antenna pair does not qualify for simultaneous transmission SAR test exemption, then the device must be tested for SAR compliance, according to the enlarged zoom scan and volume scan post-processing procedures in KDB Pub. 865664 D01.

### 3 Results of evaluation

#### 3.1 Used evaluation methods

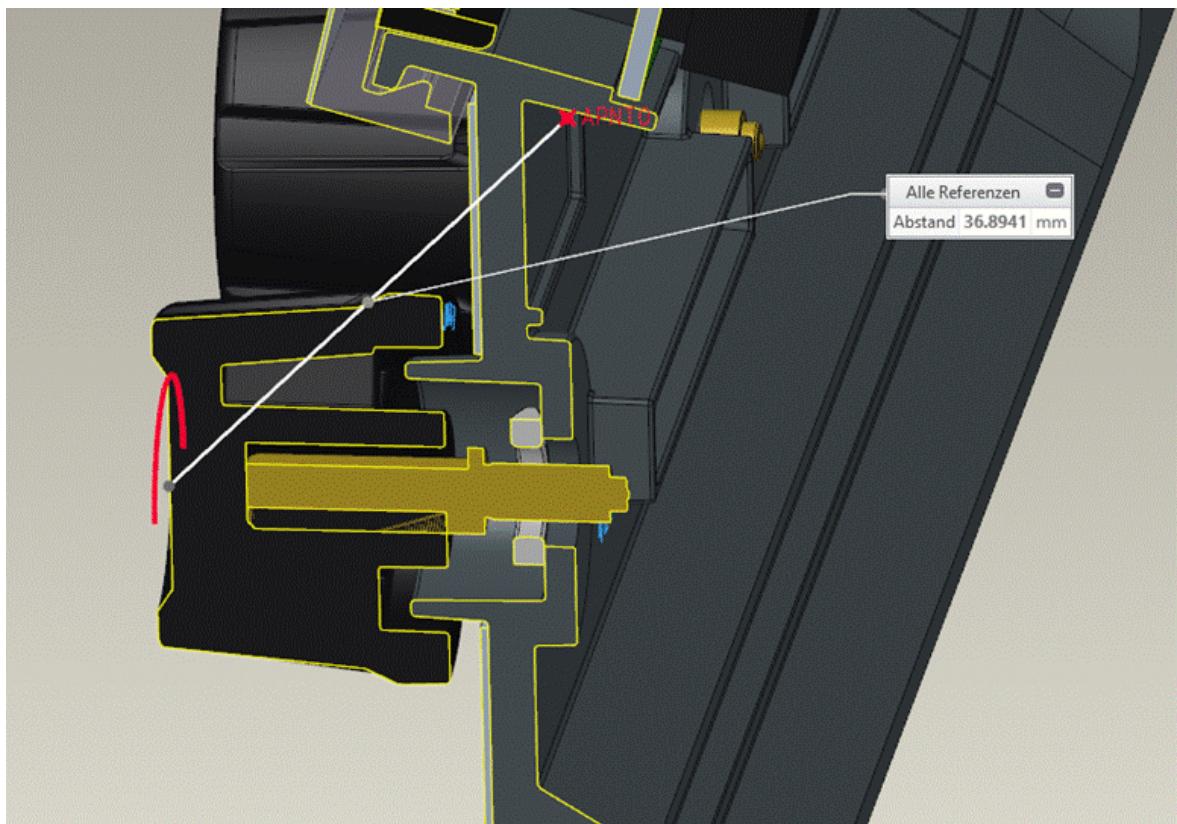
RF Exposure test exemptions for single sources			
Used	Method	See sub-clause	Comment
<input type="checkbox"/>	General Exemption acc. CFR 47 §1.1307(b)(3)(i)(A)	2.1.1	-
<input checked="" type="checkbox"/>	SAR Based Exemption acc. CFR 47 §1.1307(b)(3)(i)(B)	2.1.2	-
<input type="checkbox"/>	MPE Based Exemption acc. CFR 47 §1.1307(b)(3)(i)(C)	0	-
<input type="checkbox"/>	MPE Calculation	2.1.4	-

RF Exposure test exemptions for simultaneous transmission sources			
Used	Method	See sub-clause	Comment
<input checked="" type="checkbox"/>	Not applicable		No simultaneous possible
<input type="checkbox"/>	1 mW test Exemption acc. 2.2.1 [3]	2.2.1	-
<input type="checkbox"/>	SAR Based Exemption acc. 2.2.2 [3]	2.2.2	
<input type="checkbox"/>	MPE Based Exemption acc. 2.2.2 [3]	2.2.2	
<input type="checkbox"/>	SAR to Peak location separation ratio acc. 2.2.3 [3]	2.2.3	

### 3.2 Evaluation Distance

As declared by the applicant the minimum distance between the user and the radiating antenna 1 is 3.7 cm. An image below, provided by the applicant, illustrates the minimum distance.

Antenna	Min separation distance as declared by the applicant
Antenna 1	3.7 cm



### 3.3 BLE 2.4 GHz Emissions

The following information are based on Test-Report F241001E5 of PHOENIX TESTLAB GmbH.

#### Antenna 1 SAR Based Exemption CFR 47 §1.1307(b)(3)(i)(B)

$P_{con}$ [dBm] incl. Tuneup	$P_{con}$ [mW ] incl. Tuneup	Ant. Gain [dBi]	$P_{e.i.r.p}$ [dBm]	$P_{e.i.r.p}$ [mW]	$P_{e.r.p}$ [dBm]	$P_{e.r.p}$ [mW]		
9	7.94	3.3	12.3	16.98	10.15	10.36		
Frequency [GHz]	d [cm]	ERP <sub>20cm</sub>	x	factor limp worn	$P_{th}$ [mW]	$P_{e.r.p.}$ [mW]	Result	
2.48	3.7	3060	1.905	2.5	<b>307.45</b>	<b>10.36</b>	<b>exempted</b>	

for  $0.5 \text{ cm} \leq d \leq 20 \text{ cm}$  and  $1.5 \text{ GHz} \leq f \leq 6 \text{ GHz}$

Due to the fact that for separation distances larger than d the value for  $P_{e.r.p}$  is lower than  $P_{th}$  this emission is exempted from SAR Evaluation

### 3.4 WLAN 2.4 GHz Emissions

The following information are based on Test-Report F241001E6 of PHOENIX TESTLAB GmbH.

#### Antenna 1 SAR Based Exemption CFR 47 §1.1307(b)(3)(i)(B)

$P_{con}$ [dBm] incl. Tuneup	$P_{con}$ [mW ] incl. Tuneup	Ant. Gain [dBi]	$P_{e.i.r.p}$ [dBm]	$P_{e.i.r.p}$ [mW]	$P_{e.r.p}$ [dBm]	$P_{e.r.p}$ [mW]		
20.3	107.15	3.3	23.6	229.09	21.45	139.69		
Frequency [GHz]	d [cm]	ERP <sub>20cm</sub>	x	factor limp worn	$P_{th}$ [mW]	$P_{e.r.p.}$ [mW]	Result	
2.462	3.7	3060	1.903	2.5	<b>308.27</b>	<b>139.69</b>	<b>exempted</b>	

for  $0.5 \text{ cm} \leq d \leq 20 \text{ cm}$  and  $1.5 \text{ GHz} \leq f \leq 6 \text{ GHz}$

Due to the fact that for separation distances larger than d the value for  $P_{e.r.p}$  is lower than  $P_{th}$  this emission is exempted from SAR Evaluation

## 4 Conclusion

The EUT complies in all operational modes to the limits given in CFR 47 §1.1310(e)1 in a separation distance of 3.7 cm for antenna 1.

## 5 Report History

Report Number	Date	Comment
F241001E8	06.05.2025	Initial Test Report
F241001E8 2 <sup>nd</sup> Version	16.09.2025	<ol style="list-style-type: none"><li>1. Page 7: Updated highest internal clock frequency</li><li>2. Page 16: Added image for the minimum test separation distance from the emitting antenna and the user</li><li>3. Page 16: Updated minimum separation distance Changed the minimum separation distance</li><li>4. Page 17: Updated the SAR Based Exemption calculation</li><li>5. Page 6: Updated Test Object</li></ol>
-	-	-

--- end of test report ---