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FCC RF Exposure Evaluation

Report Number:

F241817E5

Equipment under Test (EUT):

OPT/s NFC Reader /TMC/1,5 m

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**
- [4] **ANSI C63.10: 2013** American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

Assessed and
written by:

Signature

Reviewed and
approved by:

Signature

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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:	None

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
Manufacturer represented during the test by the following person:	None

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: *	NFCTMC1
PMN: *	OPT/s NFC Reader /TMC1,5m
Model number: *	4,101,434
Order number: *	N/A
FCC ID: *	QKWNFCTMC1
IC certification number: *	12270A-NFCTMC1
Serial number: *	N/A
PCB identifier: *	4,071,832
Hardware version / HVIN: *	V0.3A
Software version / FVIN: *	V1.2.2

* Declared by the applicant

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			
Power supply EUT (Device): *	DC		
Supply voltage EUT: *	$U_{\text{nom}} = 24 \text{ V}_{\text{DC}}$	$U_{\text{min}} = 24 \text{ V}_{\text{DC}}$	$U_{\text{max}} = 24 \text{ V}_{\text{DC}}$
Temperature range: *	-20 °C to +65 °C		
Lowest / highest internal frequency: *	20 kHz / 13.56 MHz		

* Declared by the applicant

RFID part	
Operating frequency: *	13.56 MHz
Number of channels: *	1
Type of modulation: *	ASK
Data rate: *	848 kbps
Duty cycle: *	100 %
Antenna type: *	PCB antenna
Antenna connector: *	-

* Declared by the applicant

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	$P_{th}(mW) = ERP_{20cm} \left(\frac{d}{20} \right)^x$ $ERP_{20cm} (mW) = 3060$ $x = -\log_{10} \left(\frac{60}{ERP_{20cm}\sqrt{f}} \right)$	$P_{th}(mW) = ERP_{20cm}$ $ERP_{20cm} (mW) = 3060$

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 λ 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	$1920 d^2$
1.34 - 30	$3450 d^2/f^2$
30 - 300	$3.83 d^2$
300 - 1500	$0.0128 d^2/f$
1500 - 100000	$19.2 d^2$

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):

Frequency range [MHz]	Electric field strength (E) [V/m]	Magnetic field strength (H) [A/m]	Power density (S) [mW/cm ²]	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 ²)	<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 ²)	< 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 ≤ 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 ≤ 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 ≤ 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 checked="" type="checkbox"/>	General Exemption acc. CFR 47 §1.1307(b)(3)(i)(A)	2.1.1	-
<input 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)	2.1.3	-
<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 transmission 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

No evaluation distance is given by the manufacturer / applicant. According to the CFR 47 §2.1091 the device as declared by the applicant is a fixed device.

3.3 RFID Emissions

The following information are based on Test-Report F241817E2 of PHOENIX TESTLAB GmbH.

General exemption CFR 47 §1.1307(b)(3)(i)(A)

The radiated field strength of the transmitter was measured at a distance of 3 m. The measured field strength at 3 m (= Reading @ 3 m distance + Antenna factor) was 49.0 dB μ V/m. This value is converted into an EIRP power value using ANSI C63-10 clause 9.5:

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

Where

- EIRP is the equivalent isotropically radiated power
- 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

$$EIRP = 49.0 \text{ dB}\mu\text{V/m} + 20 \log(3\text{m}) - 104.7 = -46.2 \text{ dBm}$$

This value is converted into an ERP power with formula according to ANSI C63-10 clause G.5:

$$ERP = EIRP - 2.15 = -48.35 \text{ dBm}$$

The ERP power of the transmitter is -48.35 dBm or 0.015 μ W. This is below the 1 mW limit.

4 Conclusion

The OPT/s NFC Reader/TMC/1,5 m is exempted from RF exposure testing according to CFR 47 §1.1307(b)(3)(i)(A).

5 Report History

Report Number	Date	Comment
F241817E5	24.04.2025	Initial Evaluation Report
-	-	-
-	-	-

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