

# Report on the FCC and IC Testing of the Mettler-Toledo GmbH

Model: CytoDirect

Partly in accordance with FCC 47 CFR and  
ISED RSS-GEN and ISED RSS-102



Product Service

Add value.  
Inspire trust.

Prepared for: Mettler-Toledo GmbH  
Im Langacher 44  
8606 Greifensee  
SWITZERLAND

FCC ID: THV-CYTODIRECT  
Contains FCC ID: SQG-60SIPT  
IC: 22032-CYTODIRECT  
Contains IC: 3147A-602230C

## COMMERCIAL-IN-CONFIDENCE

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RESPONSIBLE FOR	NAME	DATE	SIGNATURE
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Signatures in this approval box have checked this document in line with the requirements of TÜV SÜD Product Service document control rules.

### Engineering Statement:

This measurement shown in this report was made in accordance with the procedures described on test pages.  
All reported testing was carried out on a sample equipment to demonstrate limited compliance with FCC 47 CFR and ISED RSS-102 and RSS-GEN.

The sample tested was found to comply with the requirements in the tested parts

Laboratory Accreditation	Laboratory recognition	Industry Canada test site registration
DAKK S Reg. No. D-PL-11321-11-03	Registration No. BNetzA-CAB-16/21-15	3050A-2
DAKK S Reg. No. D-PL-11321-11-04		

### Executive Statement:

A sample of this product was tested and found to be compliant with FCC 47 CFR Part 1:2022 and ISED RSS-102:2015 + A1:2021 and ISED RSS-Gen:2018 + A1:2019 + A2:2021 in the tested parts

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# 1 Report Summary

## 1.1 Modification Report

Alternations and additions of this report will be issued to the holders of each copy in the form of a complete document.

Issue	Description of changes	Date of Issue
0	First Issue	2024-02-27
1	Applicant on cover sheet changed from "Anvajo GmbH" and "Mettler-Toledo GmbH"	2024-03-25
2	Changed applicant in whole document from "Anvajo GmbH" to "Mettler-Toledo GmbH"	2024-04-02
3	Changed values at chapter 2.1.7; Added at chapter 3 the standard IEC/IEEE 62209-1528	2024-04-22
4	Corrected format of FCC-ID and IC.	2025-02-05

Table 1: Report of Modifications

## 1.2 Introduction

Applicant	Mettler-Toledo GmbH Im Langacher 44 8606 Greifensee SWITZERLAND
Manufacturer	Mettler-Toledo GmbH Im Langacher 44 8606 Greifensee SWITZERLAND
Model Number(s)	CytoDirect
Serial Number(s)	99902000001
Hardware Version(s)	1.0
Software Version(s)	OS: fl2-debug-image-fl2-carrier-board-v4-main-2119d9c3 Test-SW: fl2-product_7.3.0-htt-49-update-htt_htt_armv8 Power logic firmware: 2.1.2
Number of Samples Tested	1
Test Specification(s) / Issue / Date	FCC 47 CFR, Part 1, § 1.1307: 2022 and ISED RSS-102, Issue 5, Amd. 1: 2021
Test Plan/Issue/Date	---
Order Number	603410
Date	2023-11-30
Date of Receipt of EUT	2024-01-05
Start of Test	2024-01-29
Finish of Test	2024-01-29
Name of Engineer(s)	Alexander Grill
Related Document(s)	ANSI C63.10:2013 KDB 447498 D01 v06



### 1.3 Brief Summary of Results

A brief summary of the tests carried out in accordance with FCC 47 CFR, Part 1, § 1.1307 and ISED RSS-102 is shown below.

Section	Specification Clause	Test Description	Result
2.1	(i)(B)	RF Exposure Exemption	Pass

Table 2: Results according to FCC 47 CFR, Part 1, § 1.1307(b)(3)

Section	Specification Clause	Test Description	Result
2.1	4	RF Exposure Exemption	Pass

Table 3: Results according to ISED RSS-102



## 1.4 Product Information

### 1.4.1 Technical Description

The EUT is an automated cell counter with integrated NFC, WiFi (2,4 GHz) and R-LAN (5 GHz) connectivity.

*Supply Voltage:* 8.4 V  
*Supply Frequency:* DC, battery supplied

**WiFi Module:**

*FCC ID:* SQG-60SIPT  
*IC:* 3147A-602230C

**NFC Module:**

*FCC ID:* THV-CYTODIRECT  
*IC:* 22032-CYTODIRECT

## 1.5 Test Configuration

The EUT was 8.4 V DC, battery supplied. WiFi and NFC interfaces worked.

## 1.6 Modes of Operation

Transmitting continuously



## 1.7 EUT Modifications Record

The table below details modifications made to the EUT during the test program.  
The modifications incorporated during each test are recorded on the appropriate test pages.

Modification State	Description of Modification still fitted to EUT	Modification Fitted By	Date Modification Fitted
0	As supplied by the customer	Not Applicable	Not Applicable

Table 4

## 1.8 Test Location

TÜV SÜD Product Service conducted the following tests at our Straubing test laboratory:

Test Name	Name of Engineer(s)
RF Exposure	Alexander Grill

**Office Address:**

Äußere Frühlingstraße 45  
94315 Straubing  
Germany



## 2 Test Details

### 2.1 RF Exposure Exemption

#### 2.1.1 Specification Reference

47 CFR, Part 1, § 1.1307(b)(3)  
RSS-102, Issue 5 (2015-03-19) + Amendment 1 (2021-02-02)

#### 2.1.2 Equipment under Test and Modification State

CytoDirect; S/N 99902000001; Modification state 0

#### 2.1.3 Date of Test

2024-01-29 to 2024-01-30

#### 2.1.4 Environmental Conditions

Ambient Temperature	21 °C
Relative Humidity	31 %



## 2.1.5 Specification Limits

### 47 CFR, Part 1, § 1.1307(b)(3)

- (i) For single RF sources (i.e. any single fixed RF source, mobile device, or portable device, as defined in paragraph(b)(2) of this section): A single RF source is exempt if:
  - (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);
  - (B) Or the available maximum time-averaged power or effective radiate 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).  $P_{th}$  is given by

$$P_{th}(\text{mW}) = \begin{cases} ERP_{20\text{cm}} (d/20\text{ cm})^x, & d \leq 20\text{ cm}; \\ ERP_{20\text{cm}}, & 20\text{ cm} < d \leq 40\text{ cm} \end{cases}$$

where

$$x = -\log_{10} \left( \frac{60}{ERP_{20\text{cm}} \sqrt{f}} \right); f \text{ in GHz}$$

and

$$ERP_{20\text{cm}}(\text{mW}) = \begin{cases} 2040f, & 0.3\text{ GHz} \leq f < 1.5\text{ GHz} \\ 3060, & 1.5\text{ GHz} \leq f \leq 6\text{ GHz} \end{cases}$$

$d$  = the test separation distance (cm);

- (C) Or using the table below and the minimum separation distance ( $R$  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 described for that frequency. For the exemption in the table to apply,  $R$  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 (Watts)
0.3 – 1.34	$1920 R^2$
1.34 – 30	$3450 R^2 / f^2$
30 – 300	$3.83 R^2$
300 – 1500	$0.0128 R^2 f^2$
1500 – 100000	$19.2 R^2$

- (ii) For multiple RF sources: Multiple RF sources are exempt if:
  - (A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of 2 cm between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(i)(A).
  - (B) In case of fixed RF sources operating in the same time-averaging period, or of multiple or portable RF sources within a device in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation:

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



**47 CFR, § 1.1310, Table 1 (ii)**

Frequency range (MHz)	Electric Field (V rms)	Magnetic field (A/m rms)	Power density (W/m <sup>2</sup> )	Reference period (min)
1.34 – 30	824 / f	2.19 / f	180 / f <sup>2</sup>	< 30
1500 – 100000	---	---	1.0	< 30

**RSS-102, section 2.5.1**

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in the table below:

f (MHz)	Exemption Limits (mW) at separation distance of									
	≤ 5 mm	10 mm	15 mm	20 mm	25 mm	30 mm	35 mm	40 mm	45 mm	≥ 50 mm
≤ 300	71	101	132	162	193	223	254	284	315	345
450	52	70	88	106	123	141	159	177	195	213
835	17	30	42	55	67	80	92	105	117	130
1900	7	10	18	34	60	99	153	225	316	431
2450	4	7	15	30	52	83	123	173	235	309
3500	2	6	16	32	55	86	124	170	225	290
5800	1	6	15	27	41	56	71	85	97	106

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for route evaluation are multiplied by a factor of 5. For limb-worn devices where the 10 grams value applies, the exemption limits for routine evaluation are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.

For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implant device is defined as the higher of the conducted or e.i.r.p. to determine whether the device is exempt from the SAR evaluation.

**RSS-102, Table 4**

Frequency range (MHz)	Electric Field (V rms)	Magnetic field (A/m rms)	Power density (W/m <sup>2</sup> )	Reference period (min)
0.003 – 10	83	90	---	Instantaneous
0.1 – 10	---	0.73 / f	---	6
10 – 20	27.46	0.0728	2	6
300 – 6000	3.142 / f <sup>0.3417</sup>	0.008335 / f <sup>0.3417</sup>	0.02619 / f <sup>0.6834</sup>	6



## 2.1.6 Test Method

The RF Exposure is based on a SAR exemption calculation for a test separation distance of 1 cm.

## 2.1.7 Test Results

### 47 CFR

Evaluation according to 47 CFR, Part 1, § 1.1307(b)(3)(i)(B) and § 1.1310 Table 1 (ii) at a test distance of 1 cm

#### Evaluation of WiFi:

Frequency [MHz]	Output Power [dBm]	Output Power [mW]	Limit [mW]	Ratio
2479	6.17	4.14	10.4	0.3981
5191	-0.60	0.87	6.30	0.1381

Note: Power values see next side.

#### Evaluation of NFC:

Frequency [MHz]	Electric Field Strength [V/m]	Magnetic Field Strength [A/m]	Limit [V/m]	Limit [A/m]	Ratio
13.56	4.98	---	60.8	---	0.0819
13.56	---	0.0349	---	0.162	0.2154

Note: Power values from the Test Report TR-713316410-06 Chapter 2.2

#### Multiple frequencies / Sum of max ratios:

$$0.3981 + 0.2154 = 0.5299 < 1$$



## RSS-102

Evaluation according to RSS 102 section 2.5.1 and table 4 at a test distance of 1 cm

### Evaluation of WiFi:

Frequency [MHz]	Output Power [dBm]	Output Power [mW]	Limit [mW]	Ratio
2479	6.17	4.14	6.0	0.690
5191	-0.60	0.87	6.0	0.145

Note: Power values measured with test method from ANSI C63.10, section 11.9

Frequency (MHz)	Radiated Output Power e.i.r.p (dBm)
2409	5.25
2479	6.17
5191	-0.60
5730	-1.84

### Evaluation of NFC:

Frequency [MHz]	Output Power [dBm]	Output Power [mW]	Limit [mW]	Ratio
13.56	-48.36	0.00001	101.0	0.00000009

Note: Power value from the Test Report TR-713316410-06 Chapter 2.2

Formula for power calculation at 3m test distance:

$$\begin{aligned} P_{\text{dBm}} &= E_{\text{dB}\mu\text{V/m}} - 95.2 \\ &= 46.84 \text{ dB}\mu\text{V/m} - 95.2 \\ &= -48.36 \text{ dBm} \end{aligned}$$

Formula is from ANSI C63.10 at Chapter 12.7.3, Equation (39)

### Multiple frequencies / Sum of max ratios:

$$0.690 + 0.00000009 = 0.69 < 1$$



## 2.1.8 Test Location and Test Equipment

The test was carried out in Semi anechoic room – cabin no. 3.

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
Double ridged horn antenna	Rohde & Schwarz	HF907	40089	24	2024-10-31
EMI test receiver	Rohde & Schwarz	FSV40	20219	24	2026-03-31
Fixed attenuator	Aeroflex	Model:1 4dB	39625	36	2025-01-31
Semi anechoic room	Frankonia	Cabin No. 3	56331	36	2025-07-31
EMC measurement software	Rohde & Schwarz	EMC32 Emission	42986	---	---



### 3 Measurement Uncertainty

For a 95% confidence level, the measurement uncertainties for defined systems are:

The measurement uncertainty in the laboratory is less than or equal to the maximum measurement uncertainty according to IEC/IEEE 62209-1528 and CISPR16-4-2: 2011 + A1 + A2 + Cor1 ( $U_{CISPR}$ ). This normative regulation means that the measured value is also the value to be assessed in relation to the limit value.

Radio Interference Emission Testing			
Test Name	$k_p$	Expanded Uncertainty	
Conducted Voltage Emission			
9 kHz to 150 kHz (50Ω/50µH AMN)	2	± 3.8 dB	
150 kHz to 30 MHz (50Ω/50µH AMN)	2	± 3.4 dB	
100 kHz to 200 MHz (50Ω/5µH AMN)	2	± 3.6 dB	
Discontinuous Conducted Emission			
9 kHz to 150 kHz (50Ω/50µH AMN)	2	± 3.8 dB	
150 kHz to 30 MHz (50Ω/50µH AMN)	2	± 3.4 dB	
Conducted Current Emission			
9 kHz to 200 MHz	2	± 3.5 dB	
Magnetic Field strength			
9 kHz to 30 MHz (with loop antenna)	2	± 3.9 dB	
9 kHz to 30 MHz (large-loop antenna 2 m)	2	± 3.5 dB	
Radiated Emission			
30 MHz to 300 MHz	2	± 4.9 dB	
300 MHz to 1 GHz	2	± 5.0 dB	
1 GHz to 6 GHz	2	± 4.6 dB	
Test distance 10 m			
30 MHz to 300 MHz	2	± 4.9 dB	
300 MHz to 1 GHz	2	± 4.9 dB	
The expanded uncertainty reported according to CISPR16-4-2: 2011 + A1 + A2 + Cor1 is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$ , providing a level of confidence of $p = 95.45\%$			

Table 5 Measurement uncertainty based on CISPR 16-4-2



Radio Interference Emission Testing		
Test Name	<i>kp</i>	Expanded Uncertainty
Occupied Bandwidth	2	$\pm 5\%$
Conducted Power		
$9 \text{ kHz} \leq f < 30 \text{ MHz}$	2	$\pm 1.0 \text{ dB}$
$30 \text{ MHz} \leq f < 1 \text{ GHz}$	2	$\pm 1.5 \text{ dB}$
$1 \text{ GHz} \leq f \leq 40 \text{ GHz}$	2	$\pm 2.5 \text{ dB}$
1 MS/s power sensor (TS8997)	2	$\pm 1.5 \text{ dB}$
Occupied Bandwidth	2	$\pm 5\%$
Power Spectral Density	2	$\pm 3.0 \text{ dB}$
Radiated Power		
$9 \text{ kHz} \leq f < 26.5 \text{ GHz}$	2	$\pm 5.6 \text{ dB}$
$26.5 \text{ GHz} \leq f < 60 \text{ GHz}$	2	$\pm 8.0 \text{ dB}$
$60 \text{ GHz} \leq f < 325 \text{ GHz}$	2	$\pm 10 \text{ dB}$
Conducted Spurious Emissions	2	$\pm 3.0 \text{ dB}$
Radiated Spurious Emissions	2	$\pm 6.0 \text{ dB}$
Voltage		
DC	2	$\pm 1.0\%$
AC	2	$\pm 2.0\%$
Time (automatic)	2	$\pm 5\%$
Frequency	2	$\pm 10^{-7}$
The expanded uncertainty reported according to ETSI TR 100 028:2001 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$ , providing a level of confidence of $p = 95.45\%$		

Table 6 Measurement uncertainty based on ETSI TR 100 028