RF Exposure Evaluation Report

1. Product Information

FCC ID	2AK5Y-C10200
Product name	VT520
Test Model	C10200
Power Supply	Input: 100-240V~, 50-60Hz, 120W
Hardware Version	/
Software Version	/
125KHz	
Operating Frequency	125KHz
Channel Number	1 channel
Modulation Type	ASK
Antenna Description	External Antenna, 0dBi (Max.)
Exposure category	General population/uncontrolled environment
EUT Type	Production Unit
Device Type	Mobile Devices

2. Evaluation Method

Per KDB 680106 D01 Section 3. RF Exposure Requirements;

1) Wireless power transfer devices must comply with RF exposure requirements for all design configurations in which they can operate. At a minimum, RF exposure must be evaluated for the worst-case scenario, typically when the transmitter, while delivering energy to a client device, is operating at maximum output power. RF exposure compliance for equipment authorization must be determined following the guidance of KDB447498, which includes consideration of the different test requirements for *Mobile Device* and *Portable Device* exposure categories, as defined in §§ 2.1091 and 2.1093 of the Rules.
2) The RF exposure limits, as set forth in § 1.1310, do not cover the frequency range below 100 kHz for Specific Absorption Rate (SAR) and below 300 kHz for Maximum Permitted Exposure (MPE). In addition, present limitations of RF exposure evaluation systems prevent an accurate evaluation of SAR below 4 MHz. For these reasons, a specific MPE-based RF Exposure compliance procedure for devices operating in the aforementioned low-frequency ranges has been set in place. This procedure is applicable to Equipment Authorization of all RF devices, thus including, but not limited to, Part 18 and WPT devices. Accordingly, for § 2.1091-*Mobile* devices, the MPE limits between 100 kHz to 300 kHz are to be considered the same as those at 300 kHz in Table 1 of § 1.1310, that is, 614 V/m and 1.63 A/m, for the electric field and magnetic field, respectively. For § 2.1093-*Portable* devices below 4 MHz and down to 100 kHz, the MPE limits in § 1.1310 (with the 300 kHz limit applicable all the way down to 100 kHz) can be used for the purpose of equipment authorization in lieu of SAR evaluations.

Furthermore, consistent with FCC's equipment authorization RF exposure guidance, any device (both portable and mobile) operating at frequencies below 100 kHz is considered compliant for the purpose of equipment authorization when the external (unperturbed) temporal peak field strengths do not exceed the following reference levels:

83 V/m for the electric field strength (*E*)

and 90 A/m for the magnetic field strength (*H*)

These data may be provided through measurements and/or numerical simulations, and for all the positions in space relevant for any possible body exposure.

3) "Large size" probes may prevent the measurement of E- and/or H-fields near the surface of the radiating structure (e.g., a WPT source coil), as in the example shown in Figure 1.

If the center of the probe sensing element is located more than 5 mm from the probe outer surface, the field strengths need to be estimated through modeling for those positions that are not reachable. The estimates may be done either via numerical calculation, or via analytic model: e.g., approximated formulas for circular coils, dipoles, etc., may be acceptable if it is shown that the model is applicable for the design parameters considered. A typical example is the use of a quasi-static approximation formula for a low-frequency magnetic field source. These estimates shall include points spaced no more than 2 cm from each other. Thus, in the example of

Figure 1, at least the estimates at 0 cm and 2 cm are required, while only one point would not be sufficient. In addition, the model needs to be validated through the probe measurements for the two closest points to the device surface, and with 2-cm increments, as indicated in Figure 1. In that example, the same model must also be applied to the 4 cm and 6 cm positions, and then compared with the measured data, for validation purposes. The validation is considered sufficient if a 30% agreement between the model and the (E- and/or H-field) probe measurements is demonstrated. If such a level of agreement cannot be shown, a more accurate model (and/or a smaller probe) shall be used.

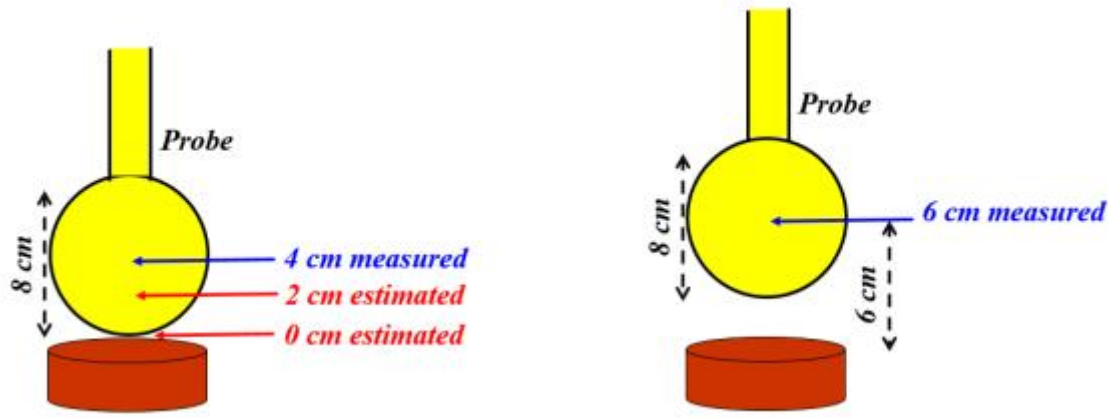


Figure 1. Example of probe (in yellow) measurements in points close to the WPT device (in red/brown). The probe radius is 4 cm, thus the closest point to the device where the field can be measured is at 4 cm from the surface (this example assumes that the probe calibration refers to the center of the sensing element structure, in this case a sphere of 4 cm radius). Data at 0 cm and 2 cm must be estimated through a model, and then the same model must be validated via comparison with the actual measurements at 4 cm and 6 cm, where the probe center can be positioned and collect valid data.

4) Part 18 Wireless Power Transfer up to One-Meter Distance. This section applies only to WPT transmitters that, by design, can provide power to a load located at a distance no greater than one meter. This distance shall be measured between the closest points between the transmitter and the receiver enclosure surfaces. For instance, two coils positioned as in Figure 2-a may be operated and considered under the provisions of this section, because both receivers are within one-meter distance from the transmitter. However, the case in Figure 2-b cannot be considered in the same way, and it is treated according to the prescription of Section 5.3.

For WPT designs with more than one radiating structure the distance to the load shall be considered as in Figure 3, thus measured between the receiver and the closest transmitting structure.

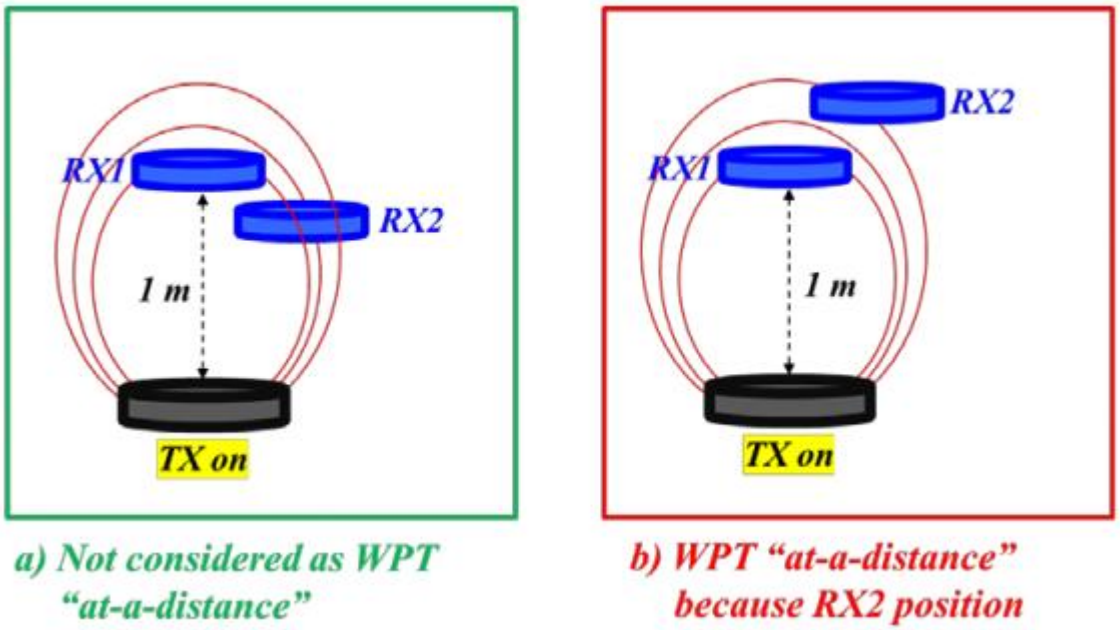


Figure 2-a) For multiple-receiver systems (here shown with two receivers, indicated with RX1 and RX2) the one-meter distance limit must apply for all the receivers that are engaged in the charging process. b) The WPT system is considered "at-a-distance" because it can function when the RX2 is further away than one meter from the transmitter.

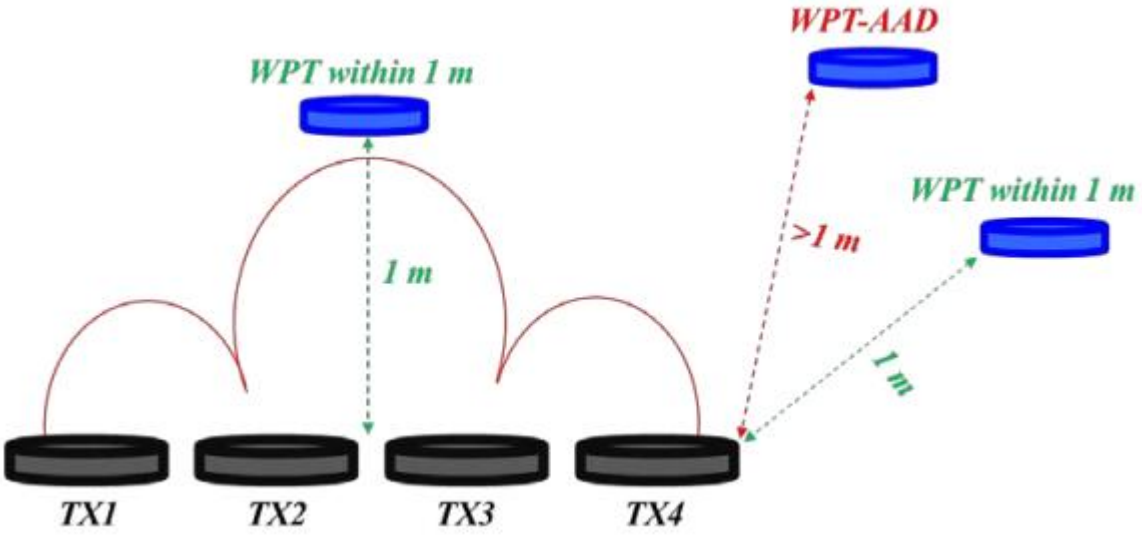


Figure 3. For multiple-coil transmitter systems, the one-meter distance limit is measured from the closest coil edge. A WPT within one meter operates with loads configured as those labeled in green font, if a load can be powered beyond one meter (in red), then it shall be considered "at-a-distance"

3. Evaluation Limit

3.1 Refer Evaluation Method

ANSI C95.1–1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

FCC KDB publication 680106 D01 RF Exposure Wireless Charging Apps v03: RF Exposure Considerations for Low Power Consumer Wireless Power Transfer Applications

FCC CFR 47 part1 1.1310: Radiofrequency radiation exposure limits.

FCC CFR 47 part2 2.1091: Radiofrequency radiation exposure evaluation: mobile devices

FCC KDB publication 447498 D04 Interim General RF Exposure Guidance v01: RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices

3.2 Limit

Limits for Maximum Permissible Exposure (MPE)/Controlled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm^2)	Averaging Time (minute)
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

Limits for Maximum Permissible Exposure (MPE)/Uncontrolled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm^2)	Averaging Time (minute)
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
300-1,500	/	/	f/1500	30
1,500-100,000	/	/	1.0	30

F=frequency in MHz

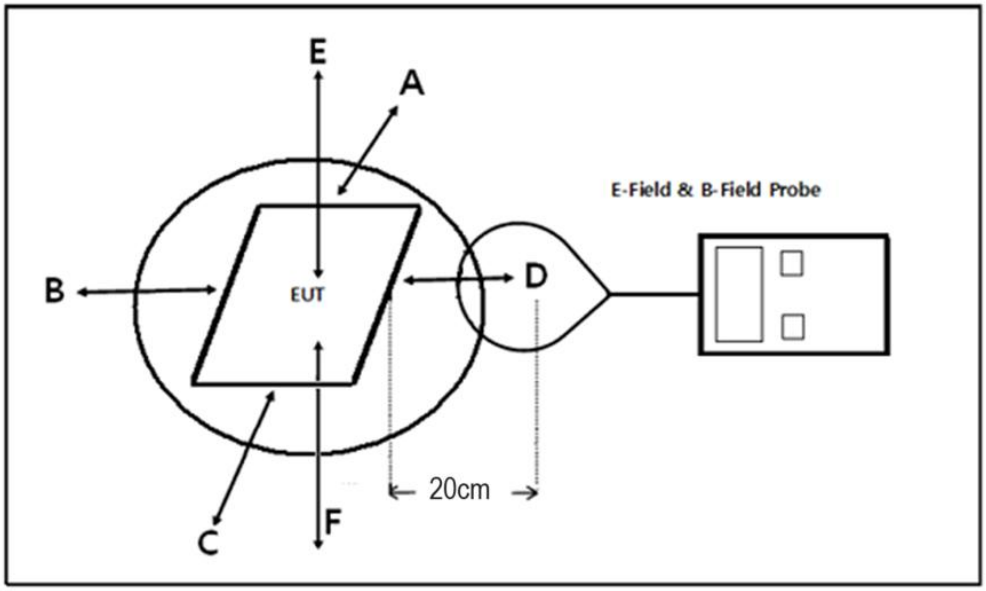
*=Plane-wave equivalent power density

According to FCC KDB 680106 D01 Section 3. RF Exposure Requirements clause 3 the Emission-Limits in the frequency range from 100 KHz to 300 KHz should be assessed versus the limits at 300 KHz in Table 1 of CFR 47 – Section1.310 as following (measured distance shall be 15cm from the center of the probe to the edge of the device):

	E-Field	*/*	B-Field
Frequency	V/m	A/m	uT
0.3 MHz – 3.0 MHz	614	1.613	2.0
3.0 MHz – 30 MHz	824/f (=27.5$_{30MHz}$)	2.19/f (=0.073$_{30MHz}$)	--

A KDB inquire was required to determine/confirm the applicable limits below 100 KHz.

4. Test Setup Diagram



5. Test Equipment

Equipment	Manufacturer	Model	Serial no.	Calibrated date	Calibrated Due
Exposure Level Tester	Narda	ELT-400	N-0713	2023-10-28	2024-10-27
B-Field Probe	Narda	ELT-400	M-1154	2023-10-28	2024-10-27
Electric field probe	Narda	EP601	611WX70332	2024-01-29	2025-01-28

6. Measurement Procedure

a) The RF exposure test was performed on 360 degree turn table in anechoic chamber.

b) The measurement probe was placed at test distance (20cm) which is between the edges of the charger and the geometric center of probe.

c) The turn table was rotated 360 degree to search of highest strength.

d) The highest emission level was recorded and compared with limit as soon as measurement of each point (A, B, C, D, E) were completed.

e) The EUT were measured according to the dictates of KDB 680106D01v03.

7. E and H field Strength

Field Strength at 20 cm from the edges surrounding the EUT and 20cm from the top surface of the EUT

Load mode	Frequency Range (kHz)	Field Strength	Measured Field Strength Values					50% Limits	Limits
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
Mode 1	125	uT	0.128	0.129	0.140	0.134	0.144	--	--
Mode 1	125	A/m	0.103	0.104	0.112	0.108	0.115	0.815	1.63
Mode 1	125	V/m	38.568	38.928	42.010	40.434	43.209	307.0	614.0

Note:V/m=10(((20lg(A/m*10^6)+51.5)-120)/20)

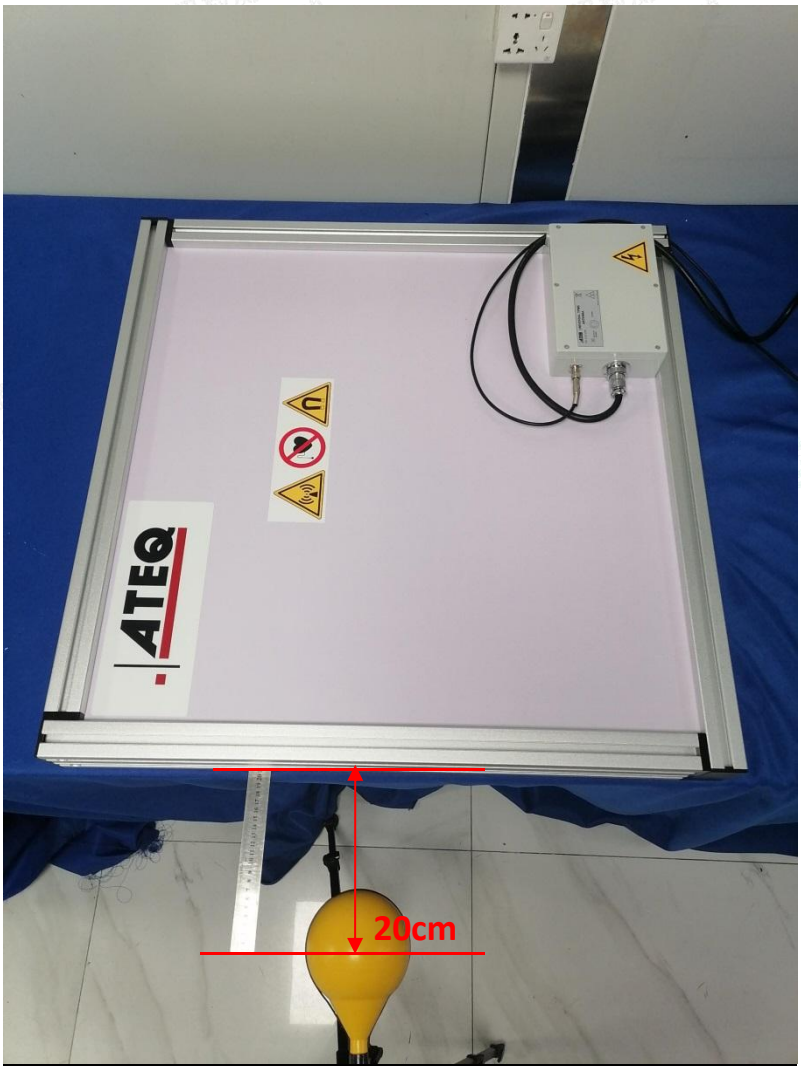
Note:A/m=uT/1.25

8. Test Setup Photos

8.1. Test Position A - Exposure photo from side edge surface-Rear

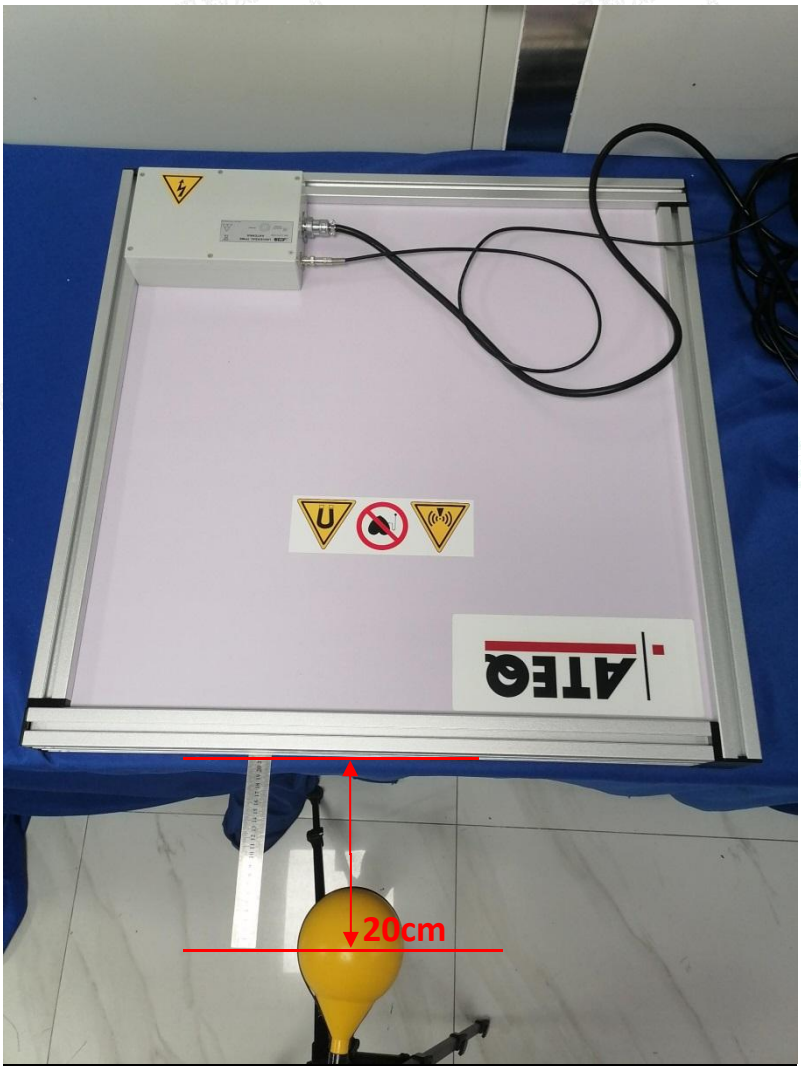
(TM1)

8.2. Test Position B - Exposure photo from side edge surface-Left



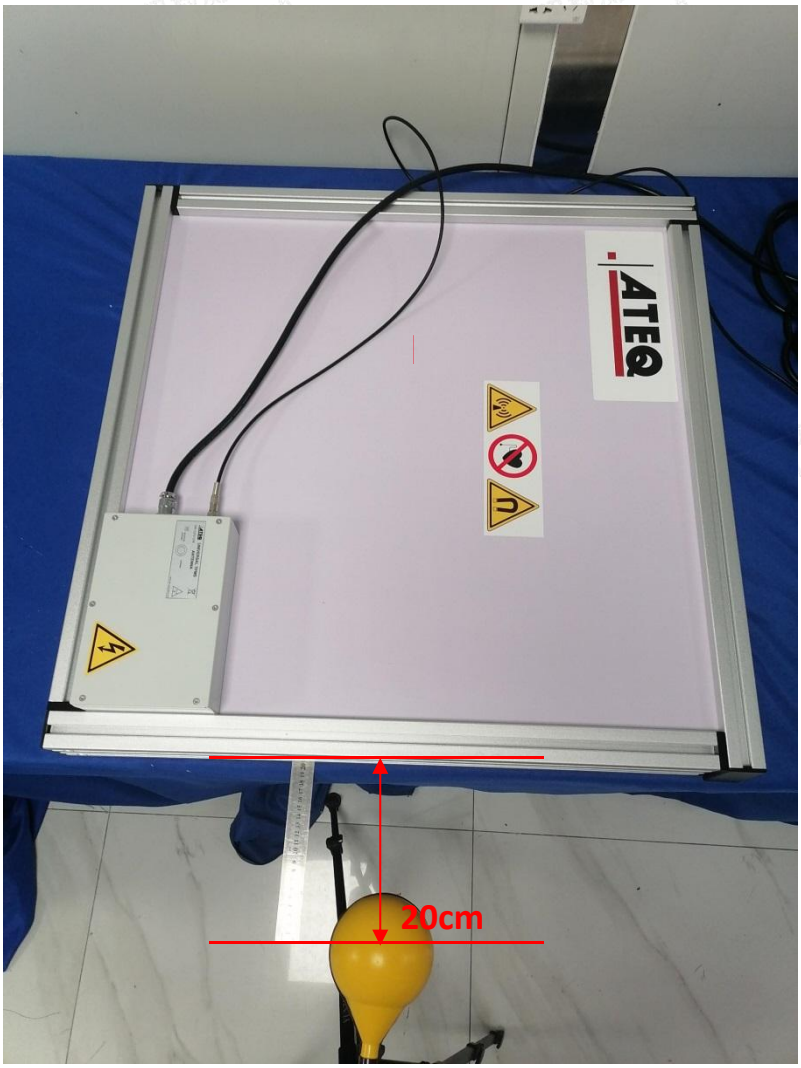
(TM1)

8.3. Test Position C - Exposure photo from side edge surface-Front



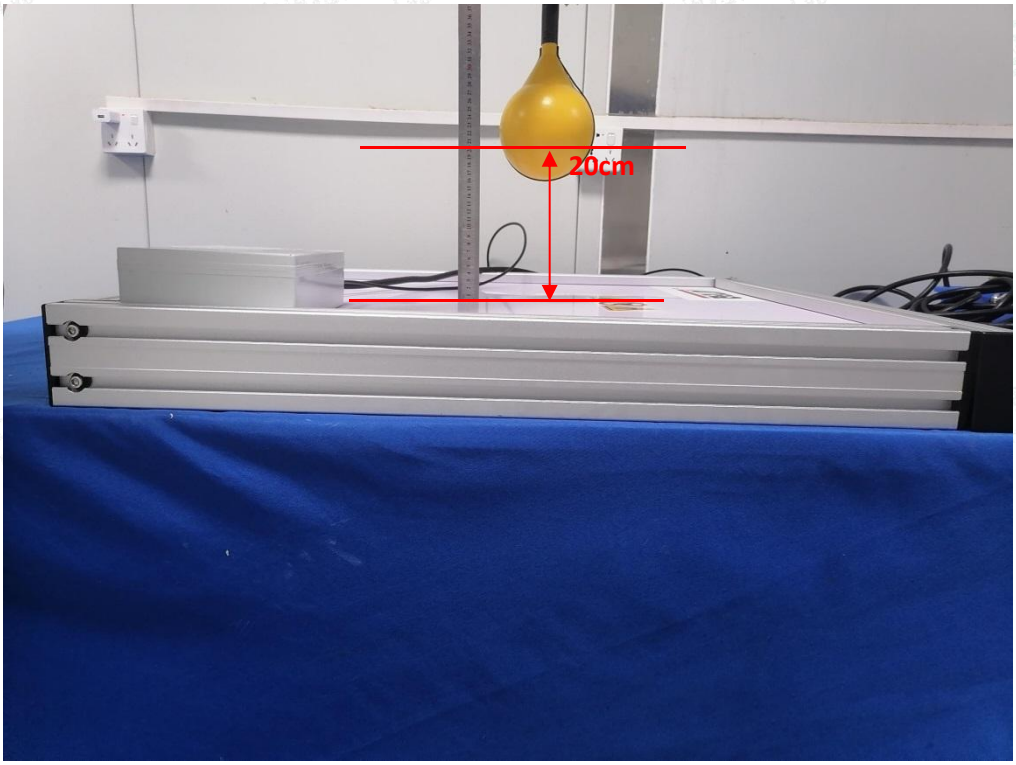
(TM1)

8.4. Test Position D - Exposure photo from side edge surface-Right



(TM1)

8.5. Test Position E - Exposure photo from top surface (20cm)



(TM1)

9 Conclusion

A minimum safety distance of at 15 cm surrounding the device and 20 cm above the top surface of the device is required when the device is charging a smart phone. The detected emissions with a distance of 15 cm surrounding the device and 20 cm above the top surface of the device are below the limitations according to FCC KDB 680106 D01 Section 3. RF Exposure Requirement Clause 3.

Revision History

Report Version	Issue Date	Revision Content	Revised By
000	July 08, 2024	Initial Issue	--

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