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EMC-EMF Safety Approvals

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## RF Exposure Compliance Report

Report No.: M2411035-2

### TESTED FOR:

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**Product Name:** TOW-PRO LINK™ Dash Mounted Remote

**Model:** EBRHX-DMT-RH

**Assessment Date:** 16 December 2024

**Issue Date:** 29 January 2025

**Specification(s):** **447498 D01 General RF Exposure Guidance v06**  
*RF exposure procedures and equipment authorization policies for mobile and portable devices.*

*Based on an assessment of the documentation provided, the TOW-PRO LINK™ Dash Mounted Remote, model: EBRHX-DMT-RH is exempted from SAR evaluation.*

### Test Engineers:

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Accreditation No.5292



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## Revision History

Version	Issue Date	Reason / Comments
1	29 January 2025	Initial issue

## General Remarks

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## 1 Project Overview

### 1.1 Introduction

The transmitter was assessed against FCC KDB 447498 D01 General RF Exposure Guidance v6.

This report shows the SAR exclusion in accordance with FCC KDB 447498 D01 clause 4.3.1,

The product sample and device information were provided by the customer

### 1.2 Test Facility

Measurements were performed at the following location:

- ☒ Melbourne Laboratory 176 Harrick Road, Keilor Park, Vic 3042
- ☐ Sydney Laboratory Unit 3/87 Station Road, Seven Hills, NSW 2147

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Country	Assessment Body	Lab Code / Member No.
Australia	NATA	Accreditation Number: 5292
Europe	European Union	Notified Body Number: 0819
USA	FCC	Designation Number: AU0001/AU0002
Canada	ISED Canada	CAB Identifier Number: AU0001/AU0002
Japan	VCCI	Company Number: 785
Taiwan	BSMI	Lab Code SL2-IN-E-5001R

### 1.3 Standards Applied

Unless otherwise noted, only the cited edition applies.

#### 447498 D01 General RF Exposure Guidance v06

RF exposure procedures and equipment authorization policies for mobile and portable devices

\*Latest version of the standard applied.

### 1.4 Device Details

(Information supplied by the Client)

The device is an electric trailer brake controller drill remote head.

<b>Manufacturer:</b>	REDARC Electronics Pty Ltd
<b>Test Sample:</b>	TOW-PRO LINK™ Dash Mounted Remote
<b>Model Number:</b>	EBRHX-DMT-RH
<b>Distance From human body in normal use:</b>	Greater than 20 cm

### 1.5 Transmitters Details

Transmitter parameters were provided by the customer and are shown below:

**RF Evaluation by Calculation: above 30MHz transmitting frequency.**

Transmitter #1	
<b>Wireless Interface 1:</b>	Nordic Semiconductor nRF52833 – BLE (REDARC assembled)
<b>Model:</b>	NRF52833
<b>Operating Frequency:</b>	BLE: 2402 – 2480 MHz
<b>RF Output Power at Antenna terminal:</b>	+8 dBm (6.31mW)
<b>Antenna Type:</b>	TDK ceramic Antenna (ANT016008LCS2442MA2)
<b>Max Antenna gain:</b>	2.5 dBi
<b>Max RF Output Power (EIRP)</b>	10.5 dBm (11.2 mW)

## 2 SAR TEST EXCLUSION THRESHOLD FOR 100 MHz to 6 GHz

### 2.1 Test Separation Distance ≤50mm

Table 1: SAR test exclusion threshold 100 MHz- 6GHz (≤50mm)

MHz	5	10	15	20	25	mm
150	39	77	116	155	194	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	
450	22	45	67	89	112	
835	16	33	49	66	82	
900	16	32	47	63	79	
1500	12	24	37	49	61	
1900	11	22	33	44	54	
2450	10	19	29	38	48	
3600	8	16	24	32	40	
5200	7	13	20	26	33	
5400	6	13	19	26	32	
5800	6	12	19	25	31	
MHz	30	35	40	45	50	mm
150	232	271	310	349	387	SAR Test Exclusion Threshold (mW)
300	164	192	219	246	274	
450	134	157	179	201	224	
835	98	115	131	148	164	
900	95	111	126	142	158	
1500	73	86	98	110	122	
1900	65	76	87	98	109	
2450	57	67	77	86	96	
3600	47	55	63	71	79	
5200	39	46	53	59	66	
5400	39	45	52	58	65	
5800	37	44	50	56	62	

**Note:** 10-g Extremity SAR Test Exclusion Power Thresholds are 2.5 times higher than the 1-g SAR Test Exclusion Thresholds indicated above. These thresholds do not apply, by extrapolation or other means, to occupational exposure limits.

#### Step A:

The 1-g Body SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$\frac{\text{max. power of channel, including tuneup tolerance (mW)}}{\text{min. test separation distance (mm)}} * \sqrt{f(\text{GHz})} \leq 3.0$$

Where:

- f(GHz) is the RF channel transmit frequency in GHz.
- Power and distance are rounded to the nearest mW and mm before calculation.
- The result is rounded to one decimal place for comparison.
- The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz.
- The values 3.0 and 7.5 are referred to as *numeric thresholds* in step B below

## 2.2 Test Separation Distance >50mm

Table 2: SAR test exclusion threshold 100 MHz- 6GHz (>50mm)

MHz	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	mW
150	387	397	407	417	427	437	447	457	467	477	487	497	507	517	527	
300	274	294	314	334	354	374	394	414	434	454	474	494	514	534	554	
450	224	254	284	314	344	374	404	434	464	494	524	554	584	614	644	
835	164	220	275	331	387	442	498	554	609	665	721	776	832	888	943	
900	158	218	278	338	398	458	518	578	638	698	758	818	878	938	998	
1500	122	222	322	422	522	622	722	822	922	1022	1122	1222	1322	1422	1522	
1900	109	209	309	409	509	609	709	809	909	1009	1109	1209	1309	1409	1509	
2450	96	196	296	396	496	596	696	796	896	996	1096	1196	1296	1396	1496	
3600	79	179	279	379	479	579	679	779	879	979	1079	1179	1279	1379	1479	
5200	66	166	266	366	466	566	666	766	866	966	1066	1166	1266	1366	1466	
5400	65	165	265	365	465	565	665	765	865	965	1065	1165	1265	1365	1465	
5800	62	162	262	362	462	562	662	762	862	962	1062	1162	1262	1362	1462	

### Step B:

For 100 MHz to 6 GHz and test separation distances > 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following.

- 1)  $\{[\text{Power allowed at } \textit{numeric threshold} \text{ for 50 mm in step A)] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$  mW, for 100 MHz to 1500 MHz
- 2)  $\{[\text{Power allowed at } \textit{numeric threshold} \text{ for 50 mm in step A)] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$  mW, for > 1500 MHz and ≤ 6 GHz

## 3 Uncertainty

EMC Technologies has evaluated the tools and methods used to perform Radiated Electromagnetic Field predictions.

The estimated measurement uncertainties shown within this report are as follows:

Electromagnetic Modelling

30 MHz to 100GHz ±2.8 dB

The above expanded uncertainties are based on standard uncertainties multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%.

## 4 Assumptions in the Assessment

This assessment does not include accumulated RF fields from nearby sites/antennas or possible radio signal reflections or attenuation due to buildings or the general environment.

Antenna Parameters and power settings were supplied by the customer.

The aperture of the radiating element assumed to be a point source in free space and far field conditions.

## 5 Evaluation Result

The standalone transmitter is exempted from SAR if the below condition satisfied in conjunction with threshold power condition in Table 2 for separation distance of >50mm. The antenna of this product, under normal use condition, is at least 20cm away from the body of the user.

$$(\text{Power allowed at numeric threshold for } 50 \text{ mm}) + (\text{test separation distance} - 50\text{mm}) * 10\text{mW}$$

Where:

Minimum test separation distance (mm): **200 mm**

Power allowed at numeric Threshold (mW): **96mW**

$$\begin{aligned} &= \{(96\text{mW}) + (\text{test separation distance} - 50\text{mm}) * 10\} \\ &= \{(96\text{mW}) + (200\text{mm} - 50\text{mm}). 10\}\text{mW} \end{aligned}$$

$$\text{Limit Threshold} = \underline{\underline{\mathbf{1596 \text{ mW}}}}$$

The transmitter, with an EIRP of 11.2 mW (10.5 dBm), is well below the SAR test exclusion threshold of 1596mW. Therefore, it is exempt from SAR evaluation for FCC compliance.

<sup>1</sup> As per KDB 447498, section 4.3 General SAR test exclusion guidance.



## Appendix A

### Referenced Documents

Document	Comments
Nordic Semiconductor_nRF52833_PS_v1.7 (Product Specification)	Transmitter Max Conducted Power
rf_ant_ant016008lcs2442ma2_summary_en	Antenna Gain

-- END OF REPORT --