



FCC RF Exposure Evaluation

1. Product Information

Product name	:	Translator Earbuds
Test Model	:	A8
Additional Model No.	:	A9
Model Declaration	:	PCB board, structure and internal of these model(s) are the same, So no additional models were tested
Ratings	:	Translator battery: 3.7V 1000mAh 3.7Wh Recharging Input: 5V==1A Translator Earbuds battery: 3.7V 40mAh 0.148Wh Recharging Input: 5V==40mA
Hardware Version	:	1.0
Software Version	:	1.0
Bluetooth		
Frequency Range	:	2402MHz~2480MHz
Channel Number	:	79 channels for Bluetooth V4.0 (DSS) 40 channels for Bluetooth V4.0 (DTS)
Channel Spacing	:	1MHz for Bluetooth V4.0 (DSS) 2MHz for Bluetooth V4.0 (DTS)
Modulation Type	:	GFSK, $\pi/4$ -DQPSK, 8-DPSK for Bluetooth V4.0 (DSS) GFSK for Bluetooth V4.0 (DTS)
Bluetooth Version	:	V4.0
Antenna Description	:	FPC Antenna, 3.33dBi(Max.)
WIFI (2.4G Band)		
Frequency Range	:	2412MHz~2462MHz
Channel Spacing	:	5MHz
Channel Number	:	11 Channels for 20MHz bandwidth (2412~2462MHz)
Modulation Type	:	IEEE 802.11b: DSSS (CCK, DQPSK, DBPSK) IEEE 802.11g: OFDM (64QAM, 16QAM, QPSK, BPSK) IEEE 802.11n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Antenna Description	:	FPC Antenna, 3.33dBi(Max.)
WIFI(5.2G Band)		
Frequency Range	:	5180MHz~5240MHz
Channel Number	:	4 Channels for 20MHz bandwidth(5180MHz~5240MHz) 2 channels for 40MHz bandwidth(5190MHz~5230MHz)
Modulation Type	:	IEEE 802.11a/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Antenna Description	:	FPC Antenna, 4.28dBi(Max.)
WIFI(5.3G Band)		
Frequency Range	:	5260MHz~5320MHz
Channel Number	:	4 Channels for 20MHz bandwidth(5260MHz~5320MHz)



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	:	2 channels for 40MHz bandwidth(5270MHz~5310MHz)
Modulation Type	:	IEEE 802.11a/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Antenna Description	:	FPC Antenna, 4.28dBi(Max.)
WIFI(5.5G Band)		
Frequency Range	:	5500MHz~5700MHz
Channel Number	:	11 Channels for 20MHz bandwidth(5500MHz~5700MHz) 5 Channels for 40MHz bandwidth(5510MHz~5670MHz)
Modulation Type	:	IEEE 802.11a/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Antenna Description	:	FPC Antenna, 4.28dBi(Max.)
WIFI(5.8G Band)		
Frequency Range	:	5745MHz~5825MHz
Channel Number	:	5 channels for 20MHz bandwidth(5745MHz~5825MHz) 2 channels for 40MHz bandwidth(5755MHz~5795MHz)
Modulation Type	:	IEEE 802.11a/n: OFDM (64QAM, 16QAM, QPSK, BPSK)
Antenna Description	:	FPC Antenna, 4.28dBi (Max.)
Exposure category	:	General population/uncontrolled environment
EUT Type	:	Production Unit
Device Type	:	Portable Device

2. Evaluation method and Limit

According to KDB447498 D01 General RF Exposure Guidance v06 Section 4.3.1 Standalone SAR test exclusion considerations: "Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.22 The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc."

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [V_f (\text{GHz})] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where:}$$

- 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
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for



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transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to f) in section 4.1 is applied to determine SAR test exclusion.

When one of the following test exclusion conditions is satisfied for all combinations of simultaneous transmission configurations, further equipment approval is not required to incorporate transmitter modules in host devices that operate in the mixed mobile and portable host platform exposure conditions. The grantee is responsible for documenting this according to Class I permissive change requirements. Antennas that qualify for standalone SAR test exclusion must apply the estimated standalone SAR to determine simultaneous transmission test exclusion.

a) The $[\sum \text{of (the highest measured or estimated SAR for each standalone antenna configuration, adjusted for maximum tune-up tolerance) / 1.6 W/kg}] + [\sum \text{of MPE ratios}] \leq 1.0$.

b) The SAR to peak location separation ratios of all simultaneously transmitting antenna pairs operating in portable device exposure conditions are all ≤ 0.04 , and the $[\sum \text{of MPE ratios}] \leq 1.0$.

3. 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 447498 D01 General RF Exposure Guidance v06](#): Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies.

[FCC CFR 47 part1 1.1310](#): Radiofrequency radiation exposure limits.

[FCC CFR 47 part2 2.1093](#): Radiofrequency radiation exposure evaluation: portable devices

4. Conducted Power Results

[BT]

Mode	Channel	Frequency (MHz)	Peak Conducted Output Power (dBm)
GFSK	0	2402	-0.03
	39	2441	0.8
	79	2480	-0.26
π/4DQPSK	00	2402	-0.25
	39	2441	1.08
	79	2480	0.19
8DPSK	00	2402	1.03
	39	2441	1.38
	79	2480	0.44

[BLE]

Mode	Channel	Frequency (MHz)	Peak Conducted Output Power (dBm)
GFSK	0	2402	0.2
	19	2440	0.03
	39	2480	0.21



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[2.4G WIFI]

Mode	Channel	Frequency (MHz)	Max Conducted Power(dBm)
IEEE 802.11b	1	2412	6.69
	6	2437	6.72
	11	2462	6.42
IEEE 802.11g	1	2412	6.11
	6	2437	5.64
	11	2462	5.8
IEEE 802.11n HT20	1	2412	6.56
	6	2437	6.17
	11	2462	6.23

[5.2G WIFI]

Mode	Channel	Frequency (MHz)	Max Conducted Power(dBm)
IEEE 802.11a	36	5180	6.08
	40	5200	6.22
	48	5240	5.09
IEEE 802.11n HT20	36	5180	6.1
	40	5200	5.9
	48	5240	5.17
IEEE 802.11n HT40	38	5190	5.85
	46	5230	5.32

[5.3G WIFI]

Mode	Channel	Frequency (MHz)	Max Conducted Power(dBm)
IEEE 802.11a	52	5260	5.89
	60	5280	5.78
	64	5320	5.99
IEEE 802.11n HT20	52	5260	5.67
	60	5280	5.47
	64	5320	5.77
IEEE 802.11n HT40	54	5270	5.53
	62	5310	6.28

[5.5G WIFI]

Mode	Channel	Frequency (MHz)	Max Conducted Power(dBm)
IEEE 802.11a	100	5500	5.45
	116	5580	5.95
	140	5700	5.74
IEEE 802.11n HT20	100	5500	5.71
	116	5580	6.25
	140	5700	6.09
IEEE 802.11n HT40	102	5510	6.39
	110	5550	5.56
	134	5670	5.54



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[5.8G WIFI Max Conducted Power]

Mode	Channel	Frequency (MHz)	Max Conducted Power(dBm)
IEEE 802.11a	149	5745	5.48
	157	5785	6.13
	165	5825	5.25
IEEE 802.11n HT20	149	5745	5.77
	157	5785	5.92
	165	5825	5.56
IEEE 802.11n HT40	151	5755	6.47
	159	5795	6.36

5. Manufacturing Tolerance

[BT]

GFSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-1.0	0	0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
$\pi/4$ DQPSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	0	1.0	0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
8DPSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	1.0	1.0	0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

[BLE_1M]

GFSK (Peak)			
Channel	Channel 0	Channel 19	Channel 39
Target (dBm)	0	0	0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

[2.4G WIFI]

11B (Peak)			
Channel	Channel 1	Channel 6	Channel 11
Target (dBm)	6.0	6.0	6.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11G (Peak)			
Channel	Channel 1	Channel 6	Channel 11
Target (dBm)	6.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N20(Peak)			
Channel	Channel 1	Channel 6	Channel 11



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Target (dBm)	6.0	6.0	6.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

[5.2G WIFI]

11A(Average)			
Channel	Channel 36	Channel 40	Channel 48
Target (dBm)	6.0	6.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N20(Average)			
Channel	Channel 36	Channel 40	Channel 48
Target (dBm)	6.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N40(Average)			
Channel	Channel 38	Channel 46	
Target (dBm)	5.0	5.0	
Tolerance $\pm$ (dB)	1.0	1.0	

[5.3G WIFI]

11A (AVG)			
Channel	Channel 52	Channel 60	Channel 64
Target (dBm)	5.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N20(AVG)			
Channel	Channel 52	Channel 60	Channel 64
Target (dBm)	5.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N40(AVG)			
Channel	Channel 54	Channel 62	
Target (dBm)	5.0	6.0	
Tolerance $\pm$ (dB)	1.0	1.0	



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[5.5G WIFI]

11A (AVG)			
Channel	Channel 100	Channel 116	Channel 140
Target (dBm)	5.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N20(AVG)			
Channel	Channel 100	Channel 116	Channel 140
Target (dBm)	5.0	6.0	6.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N40(AVG)			
Channel	Channel 102	Channel 110	Channel 134
Target (dBm)	6.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

[5.8G WIFI]

11A (Average)			
Channel	Channel 149	Channel 157	Channel 165
Target (dBm)	5.0	6.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N20(Average)			
Channel	Channel 149	Channel 157	Channel 165
Target (dBm)	5.0	5.0	5.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
11N40(Average)			
Channel	Channel 151	Channel 159	
Target (dBm)	6.0	6.0	
Tolerance $\pm$ (dB)	1.0	1.0	



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6. Evaluation Results

6.1 Standalone Evaluation

[BT]

Band/Mode		Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
				dBm	mW		
BT	GFSK	2.480	5	1.0	1.2589	$0.3965 < 3.0$	Yes
	$\pi/4$ DQPSK	2.441	5	2.0	1.5849	$0.4952 < 3.0$	Yes
	8DPSK	2.441	5	2.0	1.5849	$0.4952 < 3.0$	Yes

[BLE]

Band/Mode		Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
				dBm	mW		
BLE	GFSK	2.480	5	1.0	1.2589	$0.3965 < 3.0$	Yes

[2.4G WIFI]

Band/Mode		Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
				dBm	mW		
IEEE 802.11b		2.462	5	7.0	5.0119	$1.5728 < 3.0$	Yes
IEEE 802.11g		2.412	5	7.0	5.0119	$1.5567 < 3.0$	Yes
IEEE 802.11n HT20		2.462	5	7.0	5.0119	$1.5728 < 3.0$	Yes

[5.2G WIFI]

Band/Mode		Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
				dBm	mW		
IEEE 802.11a		5.200	5	7.0	5.0119	$2.2858 < 3.0$	Yes
IEEE 802.11n HT20		5.180	5	7.0	5.0119	$2.2814 < 3.0$	Yes
IEEE 802.11n HT40		5.230	5	6.0	3.9811	$1.8209 < 3.0$	Yes

[5.3G WIFI]

Band/Mode		Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
				dBm	mW		
IEEE 802.11a		5.320	5	6.0	3.9811	$1.8365 < 3.0$	Yes
IEEE 802.11n HT20		5.320	5	6.0	3.9811	$1.8365 < 3.0$	Yes
IEEE 802.11n HT40		5.310	5	7.0	5.0119	$2.3098 < 3.0$	Yes



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[5.5G WIFI]

Band/Mode	Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
			dBm	mW		
IEEE 802.11a	5.700	5	6.0	3.9811	1.9009 < 3.0	Yes
IEEE 802.11n HT20	5.700	5	7.0	5.0119	2.3931 < 3.0	Yes
IEEE 802.11n HT40	5.510	5	7.0	5.0119	2.3529 < 3.0	Yes

[5.8G WIFI]

Band/Mode	Frequency (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
			dBm	mW		
IEEE 802.11a	5.785	5	7.0	5.0119	2.4109 < 3.0	Yes
IEEE 802.11n HT20	5.825	5	6.0	3.9811	1.9217 < 3.0	Yes
IEEE 802.11n HT40	5.795	5	7.0	5.0119	2.4130 < 3.0	Yes

Remark:

1. Output power including tune up tolerance;
2. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to f) in section 4.1 is applied to determine SAR test exclusion.

6.2 Simultaneous Transmission for SAR Exclusion

The sample support one BT and one WIFI modular. No need consider simultaneous transmission.

7. Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1093 for the uncontrolled RF Exposure and SAR Exclusion Threshold per KDB 447498 v06.

.....THE END OF REPORT.....



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