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Report No.: R25S2025018-U401 Report Version: V01 Issue Date: 2025-02-07

RF Exposure Evaluation Declaration

FCC ID: Z9G-EDF279

Applicant: Edifier International Limited

Product: Wireless Noise Cancelling Neckband Headphones

Model No.: EDF200169

Brand Name: EDIFIER

FCC Rule Part(s): FCC Part 2.1093

Result: Complies

Evaluation Date: 2025-01-20

Reviewed By:			
	Denise Zhou	lac-MRA	
Approved By:			ACCREDITED
	Robin Wu	"hilahahah	TESTING LABORATORY CERTIFICATE #3628.01

The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

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Revision History

Report No.	Version	Description	Issue Date	Note
R25S2025018-U401	V01	Initial Report	2025-02-07	Valid



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1. General Information

1.1. Applicant

Edifier International Limited

P.O. Box 6264 General Post Office, Hong Kong

1.2. Manufacturer

Beijing Edifier Technology Co., Ltd.

815, Floor 8, Shuangqiao Building, No.68, North Fourth Ring West Road, Haidian District, 100080 Beijing,

P.R. China

1.3. Testing Facility

\boxtimes	Test Site – MRT Suzhou Laboratory					
	Laboratory Location (Suzhou - Wuzhong)					
D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zon					zhou, China	
	Laboratory Location (Suzhou - SIP)					
	4b Building, Liando	U Valley, No.200	Xingpu Rd., Shengpι	ı Town, Suzhou Indu	strial Park, China	
	Laboratory Accre	ditations				
	A2LA: 3628.01		CNAS	i: L10551		
	FCC: CN1166		ISED:	CN0001		
	VCCI:	□R-20025	□G-20034	□C-20020	□T-20020	
	VCCI.	□R-20141	□G-20134	□C-20103	□T-20104	
	Test Site – MRT Shenzhen Laboratory					
	Laboratory Location (Shenzhen)					
	1G, Building A, Jur	nxiangda Building,	Zhongshanyuan Roa	d West, Nanshan Di	strict, Shenzhen,	
	China					
	Laboratory Accre	ditations				
	A2LA: 3628.02		CNAS	: L10551		
	FCC: CN1284 ISED: CN0105					
	Test Site - MRT T	aiwan Laboratory	,			
	Laboratory Locat	ion (Taiwan)				
	No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.)					
	Laboratory Accre	ditations				
	TAF: 3261					
	FCC: 291082, TW	3261	ISED:	TW3261		



1.4. Product Information

Product Name	Wireless Noise Cancelling Neckband Headphones
Model No.	EDF200169
Bluetooth Specification	v5.4 Dual mode
Antenna Information	Refer to Section 1.5
Operating Temperature	0-45 °C
Power Type	By Battery
Product Voltage	5VDC 500mA
Rechargeable Li-ion Battery	Model: 500838
	Rated: 3.8V 150mAh
	Manufacturer: Dongguan Golden Cel Battery Co.,Ltd.

Note: The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer.

1.5. Antenna Details

Technology	Frequency Range (MHz)	Antenna Type	Max Peak Gain (dBi)
Bluetooth-LE	2402 ~ 2480	FPC Antenna	2.0

Note: The antenna gain is from antenna data sheet provided by the manufacturer.

1.6. Device Classification

According to the user manual, this device is classified as a Portable Device. So, the RF exposure evaluation requirements of § 2.1093 for portable device exposure conditions subject to SAR limits.

1.7. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

• FCC Part 2.1093 & KDB 447498 D04 Interim General RF Exposure Guidance v01



2. RF Exposure Evaluation

2.1. Limits

According to FCC §1.1310:

- (a) Specific absorption rate (SAR) shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in § 1.1307(b) of this part within the frequency range of 100 kHz to 6 GHz (inclusive).
- (b) The SAR limits for occupational/controlled exposure are 0.4 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 8 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit for occupational/controlled exposure is 20 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 6 minutes to determine compliance with occupational/controlled SAR limits.
- (c) The SAR limits for general population/uncontrolled exposure are 0.08 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 1.6 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit is 4 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 30 minutes to determine compliance with general population/uncontrolled SAR limits.



2.2. SAR Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option 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 §1.1307(b)(3)(ii)(A) of this section.

Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

$$P th(mW) = \{ERP_{20cm}(d / 20cm)^x d \le 20cm\}$$

$$P th(mW) = \{ERP_{20cm} \ 20cm < d \le 40cm \}$$

Where

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

and

$$ERP_{20cm}(mW) = \{2040f \ 0.3GHz \le f < 1.5GHz\}$$

$$ERP_{20cm}(mW) = \{3060 \ 1.5GHz \le f \le 6GHz \$$

(Option C) Or using Table 1 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 prescribed for that frequency. For the exemption in Table 1 to apply, R 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).



Table 1 to §1.1307(b)(3)(i)(c) - Single RF Source	ces Subject to Routine	Environmental Evaluation

RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	1920R ²
1.34-30	3450R ² /f ²
30-300	3.83R ²
300-1,500	0.0128R ² f
1,500-100,000	19.2R ²

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 two centimeters 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 is paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(B) in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating 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.

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

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph 1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

 P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

 $P_{th,i}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

 ERP_j = the ERP of fixed, mobile, or portable RF source j.



 $ERP_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source j, at a distance of at least $\lambda/2\pi$ according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

Evaluated_k = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

Exposure Limit_k = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k, as applicable from §1.1310 of this chapter.



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2.3. Calculated Result

Product	Wireless Noise Cancelling Neckband Headphones
Test Item	RF Exposure Evaluation

Test Mode	Frequency Band	Max. Conducted	Tune-up Conducted	Antenna	Tune-up ERP
	(MHz)	Power (dBm)	Power (dBm)	Gain (dBi)	(dBm)
BT/BLE	2402 ~ 2480	0.99	1.0	2.0	0.85

Notes:

- 1. The Max. Conducted Power of BLE was from report No: R25S2025018 -U202.
- 2. Tune-up power was declared by manufacturer.
- 3. Tune-up ERP = Tune up Conducted Power + Antenna Gain 2.15.

For single RF source, Option B

Test Mode	Frequency Band	R (mm)	Tune-up ERP	Tune-up ERP	Thresholds ERP
	(MHz)		(dBm)	(mW)	(mW)
BLE	2402 ~ 2480	5	0.85	1.22	2.72

Note: R is from user manual.

Conclusion:

The device qualifies for SAR test exemption.