# HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID : IHDT56AF9

**Equipment**: Mobile Cellular Phone

Brand Name: Motorola Model Name: XT2245-1

M-Rating: M4

Applicant : Motorola Mobility LLC

222 W, Merchandise Mart Plaza, Chicago IL 60654 USA

Manufacturer: Motorola Mobility LLC

222 W, Merchandise Mart Plaza, Chicago IL 60654 USA

Standard: FCC 47 CFR §20.19

ANSI C63.19-2011

We, Sporton International Inc. (Shenzhen), would like to declare that the tested sample has been evaluated in accordance with the test procedures and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of Sporton International Inc. (Shenzhen), the test report shall not be reproduced except in full.

Si Zhang

lac-MRA



Report No.: HA253001A

Approved by: Si Zhang

# Sporton International Inc. (Shenzhen)

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# History of this test report

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Report No.	Version	Description	Issued Date
HA253001A Rev. 01		Initial issue of report	Jul. 30, 2022

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# 1. General Information

Product Feature & Specification						
Applicant Name	Motorola Mobility LLC					
Equipment Name	Mobile Cellular Phone					
Brand Name	Motorola					
Model Name	XT2245-1					
IMEI Code	Sample 1: 357398930011504 Sample 2: 353673580028774 353673580028782					
FCC ID	IHDT56AF9					
HW	DVT2					
sw	S3SSM32.29					
EUT Stage	Identical Prototype					
Date Tested	2022/7/18					
Frequency Band	GSM850: 824 MHz ~ 849 MHz GSM1900: 1850 MHz ~ 1910 MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 10: 699 MHz ~ 716 MHz LTE Band 11: 770 MHz ~ 716 MHz LTE Band 11: 770 MHz ~ 716 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 18: 1850 MHz ~ 1915 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 38: 2570 MHz ~ 2630 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 42: 3450 MHz ~ 3550 MHz LTE Band 66: 1710 MHz ~ 1780 MHz SG NR n2: 1850 MHz ~ 2670 MHz SG NR n5: 824 MHz ~ 849 MHz SG NR n6: 8710 MHz ~ 2770 MHz SG NR n78: 3450 MHz ~ 2670 MHz SG NR n78: 3450 MHz ~ 2670 MHz SG NR n78: 3450 MHz ~ 2670 MHz SG NR n78: 3450 MHz ~ 2570 MHz SG NR n78: 3450 MHz ~ 2570 MHz SG NR n78: 3450 MHz ~ 2570 MHz SG NR n78: 3450 MHz ~ 3550 MHz WLAN 2.4GHz Band: 5241 MHz ~ 2462 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5240 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5240 MHz WLAN 5.6GHz Band: 5745 MHz ~ 5825 MHz Bluetoott: 2402 MHz ~ 2480 MHz NFC: 13.56 MHz					
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA DC-HSDPA HSPA+(16QAM uplink is not supported) LTE: QPSK, 16QAM, 64QAM, 256QAM 5G NR: CP-OFDM / DFT-s-OFDM, PI/2 BPSK, QPSK, 16QAM, 64QAM, 256QAM WLAN 2.4GHz 802.11b/g/n HT20/HT40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac VHT20/VHT40/VHT80 Bluetooth BR/EDR/LE NFC: ASK					

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# 2. Testing Location

Sporton International Inc. (Shenzhen) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.01.

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Testing Laboratory						
Test Firm	Sporton International Inc	Sporton International Inc. (Shenzhen)				
Test Site Location	1/F, 2/F, Bldg 5, Shiling Industrial Zone, Xinwei Village, Xili, Nanshan, Shenzhen, 518055 People's Republic of China TEL: +86-755-86379589 FAX: +86-755-86379595					
Took Site No	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.			
Test Site No.	SAR01-SZ	CN1256	421272			

# 3. Applied Standards

- FCC CFR47 Part 20.19
- · ANSI C63.19-2011
- · FCC KDB 285076 D01 HAC Guidance v06
- FCC KDB 285076 D03 HAC FAQ v01r05

# 4. RF Audio Interference Level

FCC wireless hearing aid compatibility rules ensure that consumers with hearing loss are able to access wireless communications services through a wide selection of handsets without experiencing disabling radio frequency (RF) interference or other technical obstacles.

To define and measure the hearing aid compatibility of handsets, in CFR47 part 20.19 ANSI C63.19 is referenced. A handset is considered hearing aid-compatible for acoustic coupling if it meets a rating of at least M3 under ANSI C63.19, and A handset is considered hearing aid compatible for inductive coupling if it meets a rating of at least T3. According to ANSI C63.19 2011 version, for acoustic coupling, the RF electric field emissions of wireless communication devices should be measured and rated according to the emission level as below.

Emissian Catagories	E-field emissions			
Emission Categories	<960Mhz	>960Mhz		
M1	50 to 55 dB (V/m)	40 to 45 dB (V/m)		
M2	45 to 50 dB (V/m)	35 to 40 dB (V/m)		
М3	40 to 45 dB (V/m)	30 to 35 dB (V/m)		
M4	<40 dB (V/m)	<30 dB (V/m)		

Table 4.1 Telephone near-field categories in linear units

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# 5. Air Interface and Operating Mode

Air	Band MHz	Turno	C63.19	Simultaneous	Name of Voice	Power
Interface	Dana IVII IZ	Туре	Tested	Transmitter	Service	Reduction
	GSM850	\/O	V	WLAN, BT	OMDO Vaisa	No
	GSM1900	VO	Yes	WLAN, BT	CMRS Voice	No
GSM	EDGE850	\/D	V	WLAN, BT	Occade Date	NI-
	EDGE1900	VD	Yes	WLAN, BT	Google Duo	No
	Band II			WLAN, BT		No
MODAAA	Band IV	VO	No <sup>(1)</sup>	WLAN, BT	CMRS Voice	No
WCDMA	Band V			WLAN, BT		No
	HSPA	VD	No <sup>(1)</sup>	WLAN, BT	Google Duo	No
	Band 2			5G NR, WLAN, BT		No
	Band 4			5G NR, WLAN, BT		No
	Band 5			5G NR, WLAN, BT		No
	Band 7			5G NR, WLAN, BT		No
LTE	Band 12	VD	No <sup>(1)</sup>	5G NR, WLAN, BT	VoLTE	No
(FDD)	Band 13	VD		5G NR, WLAN, BT	Google Duo	No
	Band 17			5G NR, WLAN, BT		No
	Band 25			5G NR, WLAN, BT		No
	Band 26			5G NR, WLAN, BT		No
	Band 66			5G NR, WLAN, BT		No
	Band 38			5G NR, WLAN, BT	VoLTE	No
LTE (TDD)	Band 41	VD	VD Yes	5G NR, WLAN, BT	Google Duo	No
(100)	Band 42			5G NR, WLAN, BT		No
	n2			LTE, WLAN, BT		No
5G NR	n5	VD	No <sup>(1)</sup>	LTE, WLAN, BT	VoNR	No
(FDD)	n7	VD	INO.	LTE, WLAN, BT	Google Duo	No
	n66			LTE, WLAN, BT		No
5G NR	n38		(1)	LTE, WLAN, BT	VoNR	No
(TDD)	n78	VD	No <sup>(1)</sup>	LTE, WLAN, BT	/ Google Duo	No
	2450	VD	Yes	GSM,WCDMA,LTE,5G NR	-	No
	5200			GSM,WCDMA,LTE,5G NR, BT	VoWiFi	No
Wi-Fi	5300	VD	No <sup>(1)</sup>	GSM,WCDMA,LTE,5G NR, BT	/	No
	5500	VD	No <sup>(1)</sup>	GSM,WCDMA,LTE,5G NR, BT	Google Duo	No
	5800			GSM,WCDMA,LTE,5G NR, BT	1	No
BT	2450	DT	No	GSM,WCDMA,LTE,5G NR, WLAN 5GHz	NA	No

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Type Transport:

VO= Voice only

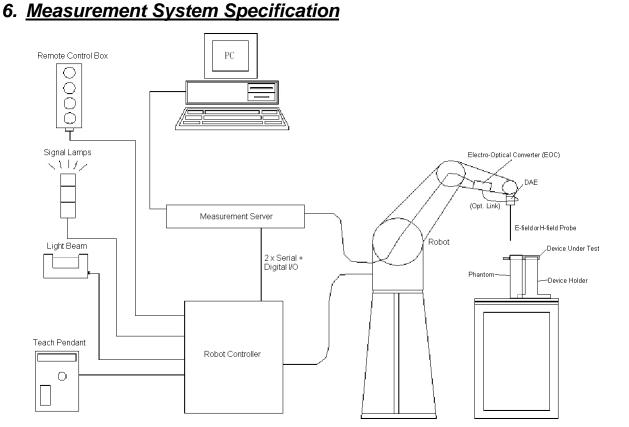
DT= Digital Transport only (no voice)

VD= CMRS and IP Voice Service over Digital Transport

- The air interface is exempted from testing by low power exemption that its average antenna input power plus its MIF is ≤17 dBm, and is rated 1.
- The device have similar frequency in some LTE bands: LTE B38/41, since the supported frequency spans for the smaller LTE bands are completely cover by the larger LTE bands, therefore, only larger LTE bands were required to be tested for hearing-aid compliance.

  There are two samples, the different between them refer to the XT2245-1\_Operational Description of Product Equality Declaration which is
- exhibit separately. According to the differences, we choose sample 1 to perform full testing and sample 2 to verify the worst case of sample 1

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Fig 6.1 System Configurations

# 6.1 E-Field Probe System

#### **E-Field Probe Specification** <ER3DV6>

Construction	One dipole parallel, two dipoles normal to probe axis	
	Built-in shielding against static charges	
Calibration	In air from 30 MHz to 3.0 GHz	
	(absolute accuracy ±6.0%, k=2)	
Frequency	30 MHz to 3 GHz;	
	Linearity: ± 2.0 dB (100 MHz to 3 GHz)	
Directivity	± 0.2 dB in air (rotation around probe axis)	
	± 0.4 dB in air (rotation normal to probe axis)	
Dynamic Range	2 V/m to 1000 V/m	
	(M3 or better device readings fall well below diode	
	compression point)	
Linearity	± 0.2 dB	
Dimensions	Overall length: 337 mm (Tip: 16 mm)	
	Tip diameter: 8 mm (Body: 12 mm)	
	Distance from probe tip to dipole centers: 2.5 mm	Photo of E-field Probe
Probo Tin Dosorin	tion:	

#### Probe Tip Description:

HAC field measurements take place in the close near field with high gradients. Increasing the measuring distance from the source will generally decrease the measured field values (in case of the validation dipole approx. 10 %per mm).

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#### 6.2 Data Storage and Evaluation

The DASY software stores the assessed data from the data acquisition electronics as raw data (in microvolt readings from the probe sensors), together with all the necessary software parameters for the data evaluation (probe calibration data, and device frequency and modulation data) in measurement files.

**Probe parameters**: - Sensitivity Norm<sub>i</sub>, a<sub>i0</sub>, a<sub>i1</sub>, a<sub>i2</sub>

Conversion factor ConvF<sub>i</sub>
 Diode compression point dcp<sub>i</sub>

**Device parameters**: - Frequency f

- Crest factor cf

**Media parameters** : - Conductivity  $\sigma$ 

- Density  $\rho$ 

The formula for each channel can be given as :

$$V_i = U_i + U_i^2 \cdot \frac{cf}{dcp_i}$$

with  $V_i$  = compensated signal of channel i, (i = x, y, z)

 $U_i$  = input signal of channel i, (i = x, y, z)

cf = crest factor of exciting field (DASY parameter)

dcp<sub>i</sub> = diode compression point (DASY parameter)

From the compensated input signals, the primary field data for each channel can be evaluated:

$$\text{E-field Probes}: E_i = \sqrt{\frac{V_i}{Norm_i \cdot ConvF}}$$

with  $V_i$  = compensated signal of channel i, (i = x, y, z)

Norm<sub>i</sub> = sensor sensitivity of channel i, (i = x, y, z),  $\mu V/(V/m)^2$  for E-field Probes

ConvF = sensitivity enhancement in solution

f = carrier frequency [GHz]

E<sub>i</sub> = electric field strength of channel i in V/m

The RSS value of the field components gives the total field strength (Hermitian magnitude):

$$\mathbf{E_{tot}} = \sqrt{\mathbf{E_x^2 + E_y^2 + E_z^2}}$$

The primary field data are used to calculate the derived field units.

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# 7. RF Emissions Test Procedure

Referenced from ANSI C63.19 -2011 section 5.5.1

a. Confirm the proper operation of the field probe, probe measurement system, and other instrumentation and the positioning system.

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- b. Position the WD in its intended test position.
- c. Set the WD to transmit a fixed and repeatable combination of signal power and modulation characteristic that is representative of the worst case (highest interference potential) encountered in normal use. Transiently occurring start-up, changeover, or termination conditions, or other operations likely to occur less than 1% of the time during normal operation, may be excluded from consideration.
- d. The center sub-grid shall be centered on the T-Coil mode perpendicular measurement point or the acoustic output, as appropriate. Locate the field probe at the initial test position in the 50 mm by 50 mm grid, which is contained in the measurement plane, refer to illustrated in Figure 8.2. If the field alignment method is used, align the probe for maximum field reception.
- e. Record the reading at the output of the measurement system.
- f. Scan the entire 50 mm by 50 mm region in equality spaced increments and record the reading at each measurement point, The distance between measurement points shall be sufficient to assure the identification of the maximum reading.
- g. Identify the five contiguous sub-grids around the center sub-grid whose maximum reading is the lowest of all available choices. This eliminates the three sub-grids with the maximum readings. Thus, the six areas to be used to determine the WD's highest emissions are identified.
- h. Identify the maximum reading within the non-excluded sub-grids identified in step g).
- i. Indirect measurement method
- j. The RF audio interference level in dB (V/m) is obtained by adding the MIF (in dB) to the maximum steady-state rms field-strength reading, in dB (V/m)
- k. Compare this RF audio interference level with the categories in ANSI C63.19-2011 clause 8 and record the resulting WD category rating.
- I. For the T-Coil perpendicular measurement location is ≥5.0 mm from the center of the acoustic output, then two different 50 mm by 50 mm areas may need to be scanned, the first for the microphone mode assessment and the second for the T-Coil assessment.
- m. The second for the T-Coil assessment, with the grid shifted so that it is centered on the perpendicular measurement point. Record the WD category rating.

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#### **Test Instructions**

- Confirm proper operation of probes and instrumentation
- Position WD
- Configure WD TX operation

Per 5.4.1.2 (1-3)

- > Initialize field probe
- Scan Area

Per 5.4.1.2 (4-6)

- Identify exclusion area.
- Rescan or reanalyze open area to determine maximum
- Direct method: Record RF Audio Interference Level, in dB(V/m)
- Indirect method: Add the MIF to the maximum steady state rms field strength and record RF Audio Interference Level, in dB(V/m)

Per 5.4.1.2 (7-9) & 5.4.1.3

Identify and record the category

Per 5.4.1.2 (9-10)

Figure 8.1 RF Emissions Flow Chart

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Fig 8.2 EUT reference and plane for HAC RF emission measurements

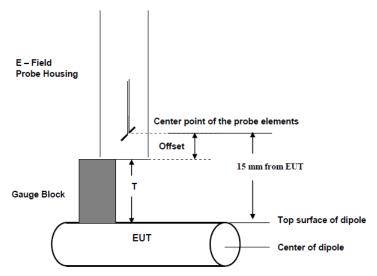


Fig. 8.3 Gauge block with E-field probe

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# 8. Test Equipment List

Manufacture		T /8.5		Calibration		
Manufacturer	Name of Equipment	Type/Model	Serial Number	Last Cal.	Due Date	
SPEAG	SPEAG 835MHz Calibration Dipole		1045	Sep. 27, 2021	Sep. 26, 2022	
SPEAG	1880MHz Calibration Dipole	CD1880V3	1038	Sep. 27, 2021	Sep. 26, 2022	
SPEAG	2450MHz Calibration Dipole	CD2450V3	1186	Jan. 25, 2022	Jan. 24, 2023	
SPEAG	2600Mhz Calibration Dipole	CD2600V3	1018	Aug. 24, 2021	Aug. 23, 2022	
SPEAG	3500Mhz Calibration Dipole	CD3500V3	1009	Mar. 03, 2022	Mar. 02, 2023	
SPEAG	Data Acquisition Electronics	DAE4	1664	May 30, 2022	May 29, 2023	
SPEAG	Isotropic E-Field Probe	ER3DV6	2302	Jun. 16, 2022	Jun. 15, 2023	
SPEAG	Test Arch Phantom	N/A	N/A	NCR	NCR	
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR	
Anritsu	Radio communication analyzer	MT8820C	6201341952	Dec. 28, 2021	Dec. 27, 2022	
R&S	Base Station(Measure)	CMU200	121815	Oct. 20, 2021	Oct. 19, 2022	
R&S	Base Station(Measure)	CMW500	143030	Jul. 30, 2021	Jul. 29, 2022	
Anritsu	Power Sensor	MA2411B	1306099	Sep. 29, 2021	Sep. 28, 2022	
Anritsu	Power Meter	ML2495A	1349001	Sep. 29, 2021	Sep. 28, 2022	
R&S	Power Sensor	NRP50S	101254	Apr. 07, 2022	Apr. 06, 2023	
Anritsu	Signal Generator	MG3710A	6201502524	Oct. 24, 2021	Oct. 23, 2022	
Agilent	Dual Directional Coupler	778D	50422	NCR	NCR	
R&S	Spectrum Analyzer	FSP7	100818	Jul. 07, 2022	Jul. 06, 2023	
Anymetre	Thermo-Hygrometer	JR593	2018100802	Oct. 29, 2021	Oct. 28, 2022	
SPEAG	Device Holder	N/A	N/A	N/A	N/A	
Woken	Attenuator	WK0602-XX	N/A	NCR	NCR	
AR	Amplifier	5S1G4	0333096	Apr. 07, 2022	Apr. 06, 2023	
mini-circuits	Amplifier	ZVE-3W-83+	599201528	Apr. 07, 2022	Apr. 06, 2023	
Weinschel	Attenuator 1	3M-10	N/A	Note 1	N/A	
Weinschel	Attenuator 2	3M-20	N/A	Note 1	N/A	
ARRA	Power Divider	A3200-2	N/A	Note 1	N/A	
ET Industries	Dual Directional Coupler	C-058-10	N/A	Note 1	N/A	

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#### Note:

- NCR: "No-Calibration Required"

  Referring to KDB 865664 D01v01r04, the dipole calibration interval can be extended to 3 years with justification. The dipoles are also not physically damaged, or repaired during the interval. 2.
- The justification data of dipole can be found in appendix C. The return loss is < -20dB, within 20% of prior calibration, the impedance is within 5 ohm of prior calibration.

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# 9. Measurement System Validation

Each DASY system is equipped with one or more system validation kits. These units, together with the predefined measurement procedures within the DASY software, enable the user to conduct the system performance check and system validation. System validation kit includes a dipole, tripod holder to fix it underneath the test Arch and a corresponding distance holder.

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The system performance check verifies that the system operates within its specifications. System and operator errors can be detected and corrected. It is recommended that the system performance check be performed prior to any usage of the system in order to guarantee reproducible results. The system performance check uses normal HAC measurements in a simplified setup with a well characterized source. This setup was selected to give a high sensitivity to all parameters that might fail or vary over time. The system check does not intend to replace the calibration of the components, but indicates situations where the system uncertainty is exceeded due to drift or failure.

#### <Test Setup>

- 1. In the simplified setup for system evaluation, the EUT is replaced by a calibrated dipole and the power source is replaced by a continuous wave which comes from a signal generator.
- 2. The center point of the probe element(s) is 15mm from the closest surface of the dipole elements.
- 3. The calibrated dipole must be placed beneath the arch phantom. The equipment setup is shown below:
- 4. The output power on dipole port must be calibrated to 20dBm (100mW) before dipole is connected.

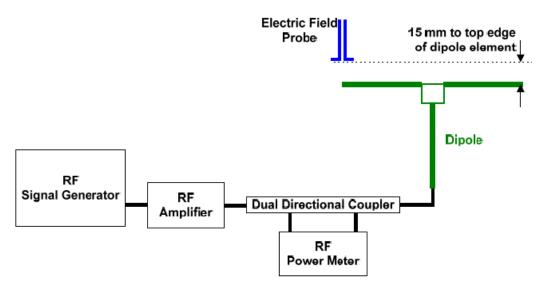


Fig. 7.1 Setup Diagram

#### <Validation Results>

Comparing to the original E-field value provided by SPEAG, the verification data should be within its specification of 18 %. Table 6.1 shows the target value and measured value. The table below indicates the system performance check can meet the variation criterion and the plots can be referred to appendix A of this report.

Deviation = ((Average E-field Value) - (Target value)) / (Target value) \* 100%

Frequency (MHz)	Input Power (dBm)	Target Value (V/m)	E-Field 1 (V/m)	E-Field 2 (V/m)	Average Value (V/m)	Deviation (%)	Date
835	20	106.8	118.6	112.2	115.4	8.05	Jul. 18, 2022
1880	20	85.5	97.33	92.05	94.69	10.75	Jul. 18, 2022
2450	20	84.7	91.36	88.16	89.76	5.97	Jul. 18, 2022
2600	20	86.1	87.12	88.28	87.7	1.86	Jul. 18, 2022
3500	20	83.4	88.62	88.12	88.37	5.96	Jul. 18, 2022

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## 10. Modulation Interference Factor

The HAC Standard ANSI C63.19-2011 defines a new scaling using the Modulation Interference Factor (MIF). For any specific fixed and repeatable modulated signal, a modulation interference factor (MIF, expressed in dB) may be developed that relates its interference potential to its steady-state rms signal level or average power level. This factor is a function only of the audio-frequency amplitude modulation characteristics of the signal and is the same for field-strength and conducted power measurements. It is important to emphasize that the MIF is valid only for a specific repeatable audio-frequency amplitude modulation characteristic. Any change in modulation characteristic requires determination and application of a new MIF

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The Modulation Interference factor (MIF, in dB) is added to the measured average E-field (in dBV/m) and converts it to the RF Audio Interference level (in dBV/m). This level considers the audible amplitude modulation components in the RF E-field. CW fields without amplitude modulation are assumed to not interfere with the hearing aid electronics. Modulations without time slots and low fluctuations at low frequencies have low MIF values, TDMA modulations with narrow transmission and repetition rates of few 100 Hz have high MIF values and give similar classifications as ANSI C63.19-2011.

ER3D, EF3D and EU2D E-field probes have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the indirect measurement method according to ANSI C63.19-2011 which is the primary method. These near field probes read the averaged E-field measurement. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by PMR calibration in order to not overestimate the field reading. Probe Modulation Response (PMR) calibration linearizes the probe response over its dynamic range for specific modulations which are characterized by their UID and result in an uncertainty specified in the probe calibration certificate. The MIF is characteristic for a given waveform envelope and can be used as a constant conversion factor if the probe has been PMR calibrated.

The evaluation method for the MIF is defined in ANSI C63.19-2011 section D.7. An RMS demodulated RF signal is fed to a spectral filter (similar to an A weighting filter) and forwarded to a temporal filter acting as a quasi-peak detector. The averaged output of these filtering is scaled to a 1 kHz 80% AM signal as reference. MIF measurement requires additional instrumentation and is not well suited for evaluation by the end user with reasonable uncertainty. It may alliteratively be determined through analysis and simulation, because it is constant and characteristic for a communication signal. DASY52 uses well-defined signals for PMR calibration. The MIF of these signals has been determined by simulation and it is automatically applied.

The MIF measurement uncertainty is estimated as follows, declared by HAC equipment provider SPEAG, for modulation frequencies from slotted waveforms with fundamental frequency and at least 2 harmonics within 10 kHz:

- 1. 0.2 dB for MIF: -7 to +5 dB
- 2. 0.5 dB for MIF: -13 to +11 dB
- 3. 1 dB for MIF: > -20 dB

MIF values applied in this test report were provided by the HAC equipment provider of SPEAG, and the worst values for all air interface are listed below to be determine the Low-power Exemption.

UID	Communication System Name	MIF(dB)
10021	GSM-FDD(TDMA,GMSK)	3.63
10025	EDGE-FDD (TDMA, 8PSK, TN 0)	3.75
10460	UMTS-FDD(WCDMA, AMR)	-25.43
10225	UMTS-FDD (HSPA+)	-20.39
10170	LTE-FDD(SC-FDMA,1RB,20MHz,16-QAM)	-9.76
10173	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM)	-1.44
10769	5G NR (CP-OFDM, 1 RB, 15 MHz, QPSK, 15 kHz)	-12.08
10061	IEEE 802.11b WiFi 2.4 GHz (DSSS, 11 Mbps)	-2.02
10077	IEEE 802.11g WiFi 2.4 GHz (DSSS/OFDM, 54 Mbps)	0.12
10427	IEEE 802.11n (HT Greeneld, 150 Mbps, 64-QAM)	-13.44
10069	IEEE 802.11a/h WiFi 5 GHz (OFDM, 54 Mbps)	-3.15
10616	IEEE 802.11ac WiFi (40MHz, MCS0, 90pc duty cycle)	-5.57

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# 11. Low-power Exemption

# <Max Tune-up Limit>

#### <Ant0>

<antu></antu>				
Freque	Average Power (dBm)			
	GSM850	33.50		
GSM	EDGE850	27.00		
GSIVI	GSM1900	30.50		
	EDGE1900	27.50		
	Band V	24.00		
WCDMA	Band IV	24.00		
VVCDIVIA	Band II	24.00		
	HSPA	23.00		
	Band 2	24.00		
	Band 4	24.00		
	Band 5	24.00		
	Band 7	24.00		
FDD LTE	Band 12	24.00		
PDD LIE	Band 13	24.00		
	Band 17	24.00		
	Band 25	24.00		
	Band 26	24.00		
	Band 66	24.00		
TDD LTE	Band 38/41_PC3	24.00		
TOO LIE	Band 38/41_PC2	27.00		
	n2	24.00		
5G NR FDD	n5	24.00		
SG NK FDD	n7	24.00		
	n66	24.00		
5G NR TDD	5G NR TDD n38			

#### <Ant1>

Freque	Average Power (dBm)	
	Band 2	23.00
FDD LTE	Band 4	20.50
PDD LIE	Band 7	19.60
	Band 66	20.50
TDD LTE	Band 38_PC3	20.50
	Band 38_PC2	22.10
5G NR FDD	n7	19.50

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#### <Ant2>

Frequency Band		Average Power (dBm)
TDD LTE Band 42		19.00
5G NR TDD	n78_PC3	19.50
SG NK TUU	n78_PC2	19.50

#### <Ant4>

Frequency Band		Average Power (dBm)
5G NR TDD	n78_PC3	19.50
SG NK TDD	n78_PC2	19.50

#### <Ant5>

Frequency Band		Average Power (dBm)
FO ND TDD	n78_PC3	19.00
5G NR TDD	n78_PC2	19.00

#### <Ant7>

Frequency Band		Average Power (dBm)
5G NR TDD	n78_PC3	24.00
	n78_PC2	25.00

#### <WLAN Ant>

Freque	Average Power (dBm)	
	802.11b	19.50
2.4GHz WLAN	802.11g	19.50
2.4GHZ WLAN	802.11n-HT20	18.50
	802.11n-HT40	17.50
	802.11a	18.50
	802.11n-HT20	18.50
5GHz WLAN	802.11n-HT40	18.50
SGHZ WLAN	802.11ac-VHT20	18.50
	802.11ac-VHT40	18.00
	802.11ac-VHT80	17.00

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#### <Low Power Exemption>

#### <Ant0>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
GSM850	33.50	3.63	37.13	Yes
EDGE850	27.00	3.75	30.75	No <sup>(1)</sup>
GSM1900	30.50	3.63	34.13	Yes
EDGE1900	27.50	3.75	31.25	No <sup>(1)</sup>
WCDMA	24.00	-25.43	-1.43	No
WCDMA - HSPA	24.00	-20.39	3.61	No
LTE - FDD	24.00	-9.76	14.24	No
LTE – TDD	27.00	-1.44	25.56	Yes
5G FR1 - FDD	24.00	-12.08	11.92	No
5G NR - TDD	24.00	-12.08	11.92	No

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#### <Ant1>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE - FDD	23.00	-9.76	13.24	No
LTE – TDD	22.10	-1.44	20.66	Yes
5G FR1 - FDD	19.50	-12.08	7.42	No

#### <Ant2>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
LTE – TDD	19.00	-1.44	17.56	Yes
5G NR - TDD	19.50	-12.08	7.42	No

#### <Ant4>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	19.50	-12.08	7.42	No

#### <Ant5>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	19.00	-12.08	6.92	No

#### <Ant7>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
5G NR - TDD	25.00	-12.08	12.92	No

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<WLAN ANT>

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
802.11b	19.50	-2.02	17.48	No <sup>(2)</sup>
802.11g	19.50	0.12	19.62	Yes
802.11n-HT20	18.50	-13.44	5.06	No
802.11n-HT40	17.50	-13.44	4.06	No
802.11a	18.50	-3.15	15.35	No
802.11n-HT20	18.50	-13.44	5.06	No
802.11n-HT40	18.50	-13.44	5.06	No
802.11ac-VHT20	18.50	-5.57	12.93	No
802.11ac-VHT40	18.00	-5.57	12.43	No
802.11ac-VHT80	17.00	-5.57	11.43	No

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#### **General Note:**

- 1. EDGE data modes is not necessary due the GSM Voice mode is the worst case.
- 2. 802.11b is not necessary due to the 802.11g is the worst case.
- 3. According to ANSI C63.19 2011-version, for the air interface technology of a device is exempt from testing when its average antenna input power plus its MIF is ≤17 dBm for any of its operating modes.
- 4. HAC RF rating is M4 for the air interface which meets the low power exemption.

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# 12. Conducted RF Output Power (Unit: dBm)

#### <GSM>

Average Antenna Input Power(dBm)										
Band	GSM850 ANTO GSM1900 ANTO									
Channel	128	189	251	512	661	810				
Frequency (MHz)	824.2	824.2 836.4 848.8		1850.2	1880.0	1909.8				
GSM (GMSK, 1 Tx slot)	GSM (GMSK, 1 Tx slot) 32.25 31.93 32.35 29.66 29.41 29.83									

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#### <LTE>

Band 38 ANT0									
BW [MHz] Modulation RB Size RB Offset Low Middle High Ch. / Freq. Ch. / Freq. Ch. / Freq.									
	Cha	nnel		37850	38000	38150			
	Frequen	cy (MHz)	2580	2595	2610				
20	QPSK	1	0	23.06	23.20	23.15			

Band 38 ANTO HPUE										
BW [MHz] Modulation RB Size RB Offset Low Middle High Ch. / Freq. Ch. / Freq. Ch. / Freq.										
	Cha	nnel		37850	38000	38150				
	Frequen	cy (MHz)	2580	2595	2610					
20	QPSK	1	0	25.44	25.46	25.38				

Band 41 ANT0										
BW [MHz] Modulation RB Size RB Offset Power Low Middle High Middle Ch. / Freq. Ch. / Freq. Ch. / Freq. Ch. / Freq.										
	Chann	el		39750	40185	40620	41055	41490		
	Frequency (MHz)			2506	2549.5	2593	2636.5	2680		
20	QPSK	1	0	23.17	23.03	23.21	23.09	23.17		

	Band 41 ANTO HPUE										
BW [MHz] Modulation RB Size RB Offset Power Power Power Power Power Power Power High Middle High Middle Ch. / Freq.											
	Chann	el		39750	40185	40620	41055	41490			
	Frequency (MHz)			2506	2549.5	2593	2636.5	2680			
20	QPSK	1	0	25.56	25.55	25.60	25.55	25.52			

Band 38 ANT1									
BW [MHz] Modulation RB Size RB Offset Power Power Power  Ch. / Freq. Ch. / Freq. Ch. / Freq.									
	Cha	nnel		37850	38000	38150			
	Frequen	cy (MHz)	2580	2595	2610				
20	QPSK	1	0	18.58	18.69	18.68			

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Band 38 ANT1 HPUE									
BW [MHz] Modulation RB Size RB Offset Power Power Power Pigh Ch. / Freq. Ch. / Freq. Ch. / Freq.									
	Cha	nnel		37850	38000	38150			
	Frequen	cy (MHz)	2580	2595	2610				
20	QPSK	1	0	20.35	20.48	20.45			

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Band 42 ANT2									
BW [MHz] Modulation RB Size RB Offset Power Power Power High Ch. / Freq. Ch. / Freq. Ch. / Freq.									
	Cha	nnel		44190	44215	44240			
	Frequen	cy (MHz)	3660	3662.5	3665				
20	QPSK	1	0	18.06	18.32	18.03			

#### <WLAN>

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)	
	802.11g 6Mbps	1	2412	17.70	
		6	2437	17.90	
		11	2462	17.30	

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# 13. HAC RF Emission Test Results

Plot No.	Air Interface	Modulation / Mode	Channel	Transmit Ant.	Sample	Average Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
1	GSM850	Voice	128	Ant0	1	32.25	3.63	35.19	9.81	M4
2	GSM850	Voice	189	Ant0	1	31.93	3.63	36.04	8.96	M4
3	GSM850	Voice	251	Ant0	1	32.35	3.63	36.25	8.75	M4
4	GSM1900	Voice	512	Ant0	1	29.66	3.63	25.60	9.40	M4
5	GSM1900	Voice	661	Ant0	1	29.41	3.63	24.76	10.24	M4
6	GSM1900	Voice	810	Ant0	1	29.83	3.63	24.68	10.32	M4
7	LTE Band 38	20M_QPSK_1_0	37850	Ant 1	1	18.58	-1.44	27.61	7.39	M4
8	LTE Band 38	20M_QPSK_1_0	38000	Ant 1	1	18.69	-1.44	27.47	7.53	M4
9	LTE Band 38	20M_QPSK_1_0	38150	Ant 1	1	18.68	-1.44	27.15	7.85	M4
10	LTE Band 38_HPUE	20M_QPSK_1_0	37850	Ant 1	1	20.35	-1.44	27.63	7.37	M4
11	LTE Band 38_HPUE	20M_QPSK_1_0	38000	Ant 1	1	20.48	-1.44	27.45	7.55	M4
12	LTE Band 38_HPUE	20M_QPSK_1_0	38150	Ant 1	1	20.45	-1.44	27.17	7.83	M4
13	LTE Band 41	20M_QPSK_1_0	39750	Ant 0	1	23.17	-1.44	21.59	13.41	M4
14	LTE Band 41	20M_QPSK_1_0	40185	Ant 0	1	23.03	-1.44	20.43	14.57	M4
15	LTE Band 41	20M_QPSK_1_0	40620	Ant 0	1	23.21	-1.44	20.20	14.80	M4
16	LTE Band 41	20M_QPSK_1_0	41055	Ant 0	1	23.09	-1.44	20.05	14.95	M4
17	LTE Band 41	20M_QPSK_1_0	41490	Ant 0	1	23.17	-1.44	19.99	15.01	M4
18	LTE Band 41_HPUE	20M_QPSK_1_0	39750	Ant 0	1	25.56	-1.44	20.74	14.26	M4
19	LTE Band 41_HPUE	20M_QPSK_1_0	40185	Ant 0	1	25.55	-1.44	20.71	14.29	M4
20	LTE Band 41_HPUE	20M_QPSK_1_0	40620	Ant 0	1	25.6	-1.44	20.62	14.38	M4
21	LTE Band 41_HPUE	20M_QPSK_1_0	41055	Ant 0	1	25.55	-1.44	20.75	14.25	M4
22	LTE Band 41_HPUE	20M_QPSK_1_0	41490	Ant 0	1	25.52	-1.44	20.84	14.16	M4
23	LTE B42	20M_QPSK_1_0	42190	Ant 2	1	18.06	-1.44	26.19	8.81	M4
24	LTE B42	20M_QPSK_1_0	42590	Ant 2	1	18.32	-1.44	26.21	8.79	M4
25	LTE B42	20M_QPSK_1_0	42990	Ant 2	1	18.03	-1.44	26.40	8.60	M4
26	WLAN2.4GHz	802.11g 6Mbps	1	Ant 3	1	17.70	0.12	29.27	5.73	M4
26A	WLAN2.4GHz	802.11g 6Mbps	1	Ant 3	2	17.70	0.12	29.07	5.93	M4
27	WLAN2.4GHz	802.11g 6Mbps	6	Ant 3	1	17.90	0.12	28.56	6.44	M4
28	WLAN2.4GHz	802.11g 6Mbps	11	Ant 3	1	17.30	0.12	27.16	7.84	M4

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#### Remark:

- 1. The HAC measurement system applies MIF value onto the measured RMS E-field, which is indirect method in ANSI C63.19 2011 version, and reports the RF audio interference level.
- 2. Phone Condition: Mute on; Backlight off; Max Volume

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# 14. Uncertainty Assessment

The component of uncertainly may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainly by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance.

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The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances. Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is showed in Table 14.1.

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.

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Error Description	Uncertainty Value (±%)	Probability	Divisor	(Ci) E	(Ci) H	Standard Uncertainty (E) (±%)
Measurement System						
Probe Calibration	5.1	N	1	1	1	5.1
Axial Isotropy	4.7	R	1.732	1	1	2.7
Sensor Displacement	16.5	R	1.732	1	0.145	9.5
Boundary Effects	2.4	R	1.732	1	1	1.4
Phantom Boundary Effect	7.2	R	1.732	1	0	4.2
Linearity	4.7	R	1.732	1	1	2.7
Scaling with PMR calibration	10.0	R	1.732	1	1	5.8
System Detection Limit	1.0	R	1.732	1	1	0.6
Readout Electronics	0.3	N	1	1	1	0.3
Response Time	2.6	R	1.732	1	1	1.5
Integration Time	2.6	R	1.732	1	1	1.5
RF Ambient Conditions	3.0	R	1.732	1	1	1.7
RF Reflections	12.0	R	1.732	1	1	6.9
Probe Positioner	1.2	R	1.732	1	0.67	0.7
Probe Positioning	4.7	R	1.732	1	0.67	2.7
Extrap. and Interpolation	1.0	R	1.732	1	1	0.6
Test Sample Related						
Device Positioning Vertical	4.7	R	1.732	1	0.67	2.7
Device Positioning Lateral	1.0	R	1.732	1	1	0.6
Device Holder and Phantom	2.4	R	1.732	1	1	1.4
Power Drift	5.0	R	1.732	1	1	2.9
Phantom and Setup Related						
Phantom Thickness	2.4	R	1.732	1	0.67	1.4
Co	mbined Std. Unc	ertainty				16.4%
Co	overage Factor fo	or 95 %				K=2
Ex	panded STD Und	ertainty				32.7%

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Table 14.1 Uncertainty Budget of HAC free field assessment

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# 15. References

[1] ANSI C63.19-2011, "American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids", 27 May 2011.

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- [2] FCC KDB 285076 D01v06, "Equipment Authorization Guidance for Hearing Aid Compatibility", Feb. 23, 2022
- [3] FCC KDB 285076 D03v01r05, "Hearing aid compatibility frequently asked questions", Feb. 23, 2022.
- [4] SPEAG DASY System Handbook

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