

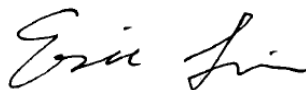
1 Cover Page

RF Exposure Evaluation Report

Application No.: KSCR2203000393AT
FCC ID: 2AGOFRC466A
IC: 24503-RC466A
Applicant: HCS (SUZHOU) LIMITED
Address of Applicant: 19F-20F, Building B-3rd, No.209 Zhuyuan Road, New District, Suzhou, Jiangsu, China
Manufacturer: HCS (SUZHOU) LIMITED
Address of Manufacturer: 19F-20F, Building B-3rd, No.209 Zhuyuan Road, New District, Suzhou, Jiangsu, China
Factory: Himit (Yueyang) Technology Ltd.
Address of Factory: Building 4, Lingang High-tech Industrial Park, Yueyang Area, China (Hunan) Free Trade Pilot Zone
Equipment Under Test (EUT):
EUT Name: Remote Control
Model No.: RC4663801/01BR
Add Model No.: RC466XXXX/XXR, RC466XXXX/XXBR, ("X"=0-9."B"means packed with battery)
For IC Model No.: RC4663801/01BR
Standard(s) : FCC Rules 47 CFR §2.1093
KDB 447498 D04 interim General RF Exposure Guidance v01
RSS-102 Issue 5 Amendment 1 (February 2, 2021)
Date of Receipt: 2022-03-30
Date of Test: 2022-04-02 to 2022-04-14
Date of Issue: 2022-04-18

| | |
|---------------------|--------------|
| Test Result: | Pass* |
|---------------------|--------------|

* In the configuration tested, the EUT complied with the standards specified above.



Eric Lin
EMC Laboratory Manager



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| Revision Record | | | | |
|-----------------|---------|------------|----------|----------|
| Version | Chapter | Date | Modifier | Remark |
| 01 | | 2022-04-18 | | Original |
| | | | | |
| | | | | |

| | | | | |
|--------------------------|--|-----------------------------|--|--|
| Authorized for issue by: | | | | |
| | | Damon Zhou | | |
| | | Damon Zhou/Project Engineer | | |
| | | Eric Lin | | |
| | | Eric Lin/Reviewer | | |



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3 General Information

3.1 General Description of E.U.T.

| | |
|---------------|---|
| Power supply: | DC 3V |
| Product Type: | <input checked="" type="checkbox"/> Portable device |
| | <input type="checkbox"/> Mobile device |
| | <input type="checkbox"/> Fixed device |

3.2 Details of E.U.T.

| | |
|----------------------|-------------------------------------|
| Operation Frequency: | 2402MHz to 2480MHz |
| Bluetooth Version: | V5.0 LE |
| Modulation Type: | GFSK |
| Number of Channels: | 40 |
| Data Rate: | 1Mbps, 2 Mbps |
| Channel Spacing: | 2MHz |
| Antenna Type: | PCB Antenna |
| Antenna Gain: | 0dBi (Provided by the manufacturer) |
| Firmware Version: | V0.4 |
| Serial Number: | 313923841731 |



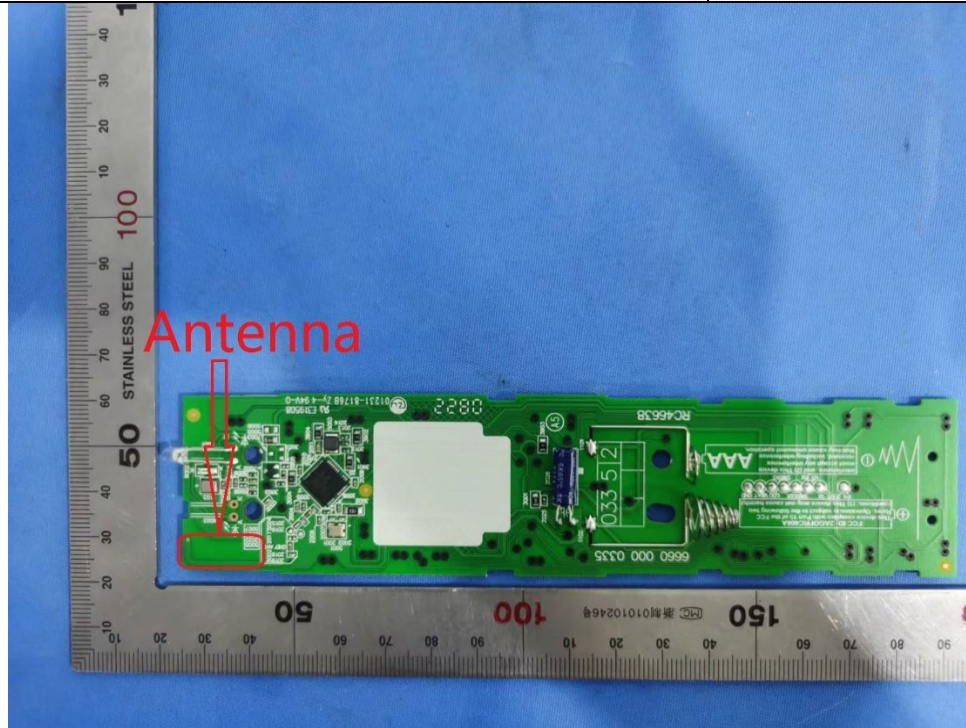
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3.3 Separation Distance

Separation distance between the antenna to person (R):



Remark 1: This 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.

Remark 2: The distance between BLE antenna and handle of the EUT is 5mm.



Compliance Certification Services (Kunshan) Inc.
EMC Laboratory

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3.4 Test Location

All tests were performed at:

Compliance Certification Services (Kunshan) Inc.

No.10 Weiye Rd, Innovation park, Eco&Tec, Development Zone, Kunshan City, Jiangsu, China.

Tel: +86 512 5735 5888

Fax: +86 512 5737 0818

3.5 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

• CNAS (No. CNAS L4354)

CNAS has accredited Compliance Certification Services (Kunshan) Inc. to ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories (CNAS-CL01 Accreditation Criteria for the Competence of Testing and Calibration Laboratories) for the competence in the field of testing.

• A2LA (Certificate No. 2541.01)

Compliance Certification Services (Kunshan) Inc. is accredited by the American Association for Laboratory Accreditation (A2LA). Certificate No. 2541.01.

• FCC (Designation Number: CN1172)

Compliance Certification Services (Kunshan) Inc. has been recognized as an accredited testing laboratory.

Designation Number: CN1172.

• ISED (CAB identifier: CN0072)

Compliance Certification Services (Kunshan) Inc. has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory.

Company Number: 2324E

• VCCI (Member No.: 1938)

The 3m and 10m Semi-anechoic chamber and Shielded Room of Compliance Certification Services (Kunshan) Inc. has been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-20134, R-11600, C-11707, T-11499, G-10216 respectively.



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4 FCC Radiofrequency radiation exposure limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

4.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

4.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation

| RF Source Frequency | | | Minimum Distance | | | Threshold ERP |
|---------------------|---|-----------|--------------------|---|--------------------|--------------------------------------|
| f_L MHz | | f_H MHz | $\lambda_L / 2\pi$ | | $\lambda_H / 2\pi$ | W |
| 0.3 | — | 1.34 | 159 m | — | 35.6 m | 1,920 R ² |
| 1.34 | — | 30 | 35.6 m | — | 1.6 m | 3,450 R ² /f ² |
| 30 | — | 300 | 1.6 m | — | 159 mm | 0.83 R ² |
| 300 | — | 1,500 | 159 mm | — | 31.8 mm | 0.0128 R ² f |
| 1,500 | — | 100,000 | 31.8 mm | — | 0.5 mm | 19.2R ² |

Subscripts L and H are low and high; λ is wavelength.
From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The thresholds are



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based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary if the ERP of the device is greater than $ERP_{20\text{cm}}$ in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{\text{th}} \text{ (mW)} = ERP_{20\text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases} \quad (\text{B. 1})$$

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only 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.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

| Limit calculation | | | |
|-------------------|----------------|-----------------------|------------------|
| Frequency range | Frequency(MHz) | $R(\lambda/2\pi)$ (m) | Threshold ERP(W) |
| 1500~100000MHz | 2480 | 0.0193 | 0.007 |

4.3 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.



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The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by Formula (B.2).

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B.2})$$

where

$$x = -\log_{10} \left(\frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right)$$

and f is in GHz, d is the separation distance (cm), and $ERP_{20 \text{ cm}}$ is per Formula (B.1).



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Example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

| Frequency (MHz) | Distance(mm) | | | | | | | | | |
|-----------------|--------------|----|----|-----|-----|-----|-----|-----|-----|-----|
| | 5 | 10 | 15 | 20 | 25 | 30 | 35 | 40 | 45 | 50 |
| 300 | 39 | 65 | 88 | 110 | 129 | 148 | 166 | 184 | 201 | 217 |
| 450 | 22 | 44 | 67 | 89 | 112 | 135 | 158 | 180 | 203 | 226 |
| 835 | 9 | 25 | 44 | 66 | 90 | 116 | 145 | 175 | 207 | 240 |
| 1900 | 3 | 12 | 26 | 44 | 66 | 92 | 122 | 157 | 195 | 236 |
| 2450 | 3 | 10 | 22 | 38 | 59 | 83 | 111 | 143 | 179 | 219 |
| 3600 | 2 | 8 | 18 | 32 | 49 | 71 | 96 | 125 | 158 | 195 |
| 5800 | 1 | 6 | 14 | 25 | 40 | 58 | 80 | 106 | 136 | 169 |

| Limit calculation | | | | |
|----------------------|----------------|-------|--------------|----------|
| Frequency range(GHz) | Frequency(GHz) | X | Distance(cm) | Pth (mW) |
| 1.5~6 | 2.48 | 1.905 | 0.5 | 2.717 |
| | | | | |



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4.4 IC Radiofrequency radiation exposure limits

According to RSS-102 section 2.5.1, SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance

| MHz | 5 | 10 | 15 | 20 | 25 | 30 | 35 | 40 | 45 | 50 | mm |
|------|----|-----|-----|-----|-----|-----|-----|-----|-----|-----|----|
| ≤300 | 71 | 101 | 132 | 162 | 193 | 223 | 254 | 284 | 315 | 345 | mW |
| 450 | 52 | 70 | 88 | 106 | 123 | 141 | 159 | 177 | 195 | 213 | |
| 835 | 17 | 30 | 42 | 55 | 67 | 80 | 92 | 105 | 117 | 130 | |
| 1900 | 7 | 10 | 18 | 34 | 60 | 99 | 153 | 225 | 316 | 431 | |
| 2450 | 4 | 7 | 15 | 30 | 52 | 83 | 123 | 173 | 235 | 309 | |
| 3500 | 2 | 6 | 16 | 32 | 55 | 86 | 124 | 170 | 225 | 290 | |
| 5800 | 1 | 6 | 15 | 27 | 41 | 56 | 71 | 85 | 97 | 106 | |

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required



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5 Measurement and Calculation

5.1 Maximum transmit power

The Power Data is based on the RF Test Report KSCR220300039301.

| Test Mode | Test Channel | Power[dBm] | | Peak Power (mW) | |
|-----------|--------------|------------|------|-----------------|------|
| | | 1M | 2M | 1M | 2M |
| BLE | 2402 | 2.33 | 2.37 | 1.71 | 1.73 |
| BLE | 2440 | 2.64 | 2.68 | 1.84 | 1.85 |
| BLE | 2480 | 2.93 | 2.91 | 1.96 | 1.95 |

5.2 RF Exposure Calculation

The Max Conducted Peak Output Power is 1.96mW. The best case gain of the antenna is 0dBi.

0dBi logarithmic terms convert to numeric result is nearly 1.

According to the formula, calculate the EIRP test result:

For FCC: $EIRP = P \times G = 1.96mW \times 1 = 1.96mW < 2.717mW$

Remark: we used the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

| | Evaluation method | Separation distance between the antenna to person (R) | Exempt Limit(mW) | Verdict |
|-------------------------------------|---------------------------------|---|------------------|---------|
| <input type="checkbox"/> | Blanket 1 mW Blanket Exemption | No distance requirement | 1mW | N/A |
| <input type="checkbox"/> | MPE-based Exemption(ERP) | $(\lambda / 2 \pi) \leq R$ | 7mW(ERP) | N/A |
| <input checked="" type="checkbox"/> | SAR-based Exemption(P_{th}) | $0.5cm \leq R \leq 40cm$ | 2.7mW | Yes |

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report.

For IC: $EIRP = P \times G = 1.96mW \times 1 = 1.96mW < 10mW$

So the SAR report is not required.

--End of the Report--



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