

# HEARING AID COMPATIBILITY RF EMISSIONS TEST REPORT

FCC ID : IHDT56ZP6  
Equipment : Mobile Cellular Phone  
Brand Name : Motorola  
Model Name : XT2271-3, XT2271-4  
M-Rating : M3  
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.



Approved by: Si Zhang

**Sporton International Inc. (Shenzhen)**

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People's Republic of China



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### History of this test report

Report No.	Version	Description	Issued Date
HA260816-04A	Rev. 01	Initial issue of report	Nov. 25, 2022

**1. General Information**

Product Feature & Specification	
Applicant Name	Motorola Mobility LLC
Equipment Name	Mobile Cellular Phone
Brand Name	Motorola
Model Name	XT2271-3, XT2271-4
IMEI Code	Sample 1: 358390900028989 Sample 2: 358390900031322
FCC ID	IHDT56ZP6
HW	PVT
SW	S3SG32.39-32
EUT Stage	Identical Prototype
Date Tested	2022/11/11 ~ 2022/11/18
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 5: 824 MHz ~ 849 MHz LTE Band 12 : 699 MHz ~ 716 MHz LTE Band 13 : 777 MHz ~ 787 MHz LTE Band 14 : 788 MHz ~ 798 MHz LTE Band 30 : 2305 MHz ~ 2315 MHz LTE Band 66: 1710 MHz ~ 1780 MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5700 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz Bluetooth: 2402 MHz ~ 2480 MHz
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA/HSUPA DC-HSDPA HSPA+ (16QAM uplink is supported) LTE: QPSK, 16QAM, 64QAM 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



## **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.

Testing Laboratory			
Test Firm	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		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR01-SZ	CN1256	421272

## **3. Applied Standards**

- FCC CFR47 Part 20.19
- ANSI C63.19-2011
- FCC KDB 285076 D01 HAC Guidance v06r02
- FCC KDB 285076 D03 HAC FAQ v01r06

## **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.

Emission Categories	E-field emissions	
	<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)
M3	40 to 45 dB (V/m)	30 to 35 dB (V/m)
M4	<40 dB (V/m)	<30 dB (V/m)

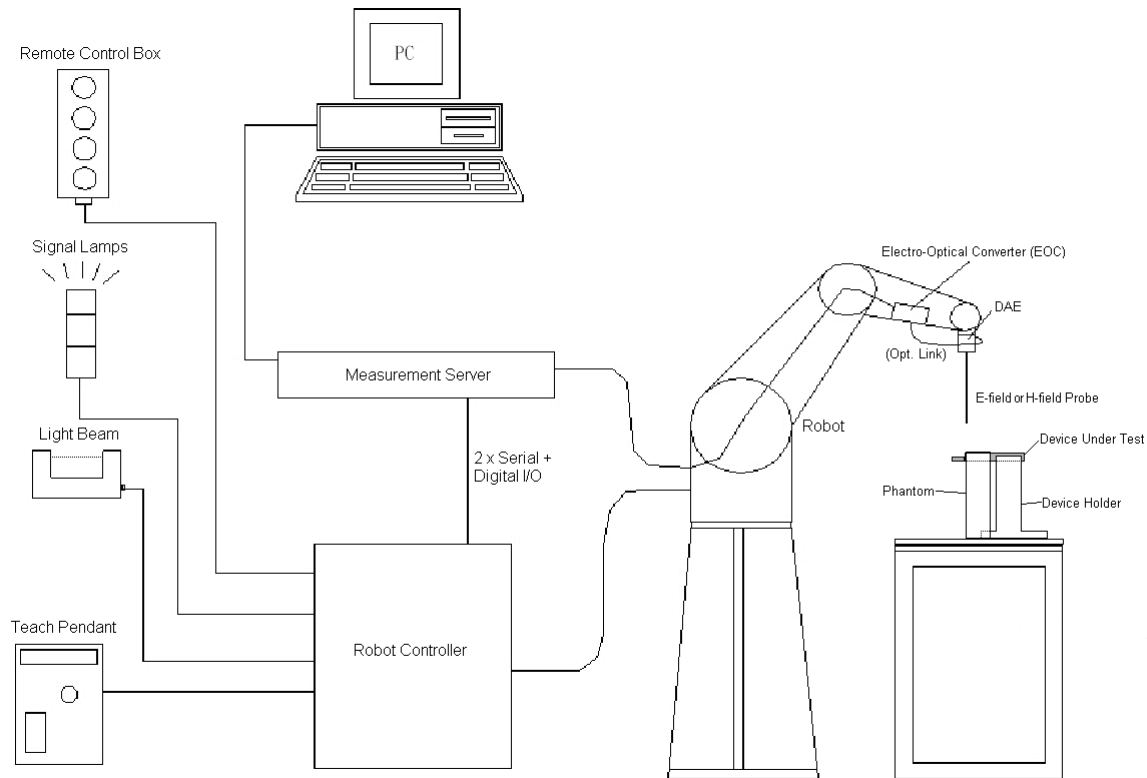
**Table 4.1 Telephone near-field categories in linear units**



## 5. Air Interface and Operating Mode

Air Interface	Band MHz	Type	C63.19 Tested	Simultaneous Transmitter	Name of Voice Service	Power Reduction
GSM	GSM850	VO	Yes	WLAN, BT	CMRS Voice	No
	GSM1900			WLAN, BT		No
	EDGE850	VD	Yes	WLAN, BT	Google Duo	No
	EDGE1900			WLAN, BT		
WCDMA	Band II	VO	No <sup>(1)</sup>	WLAN, BT	CMRS Voice	No
	Band IV			WLAN, BT		No
	Band V			WLAN, BT		No
	HSPA	VD	No <sup>(1)</sup>	WLAN, BT	Google Duo	No
LTE (FDD)	Band 2	VD	No <sup>(1)</sup>	WLAN, BT	VoLTE / Google Duo	No
	Band 4			WLAN, BT		No
	Band 5			WLAN, BT		No
	Band 12			WLAN, BT		No
	Band 13			WLAN, BT		No
	Band 14			WLAN, BT		No
	Band 30			WLAN, BT		No
	Band 66			WLAN, BT		No
Wi-Fi	2450	VD	Yes	GSM,WCDMA,LTE	VoWiFi / Google Duo	No
	5200	VD	No <sup>(1)</sup>	GSM,WCDMA,LTE, BT		No
	5300			GSM,WCDMA,LTE, BT		No
	5500			GSM,WCDMA,LTE, BT		No
	5800			GSM,WCDMA,LTE, BT		No
BT	2450	DT	No	GSM,WCDMA,LTE, WLAN 5GHz	NA	No
Type Transport: VO= Voice only DT= Digital Transport only (no voice) VD= CMRS and IP Voice Service over Digital Transport						
Remark: 1. 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 as M4. 2. The device have similar frequency in some LTE bands: LTE B4/66, 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.						

## 6. Measurement System Specification



**Fig 6.1 System Configurations**

### 6.1 E-Field Probe System

#### E-Field Probe Specification

<EF3DV3>

<b>Construction</b>	One dipole parallel, two dipoles normal to probe axis Built-in shielding against static charges
<b>Calibration</b>	In air from 30 MHz to 6.0 GHz (absolute accuracy $\pm 6.0\%$ , $k=2$ )
<b>Frequency</b>	30 MHz to 6 GHz; Linearity: $\pm 2.0$ dB (100 MHz to 3 GHz)
<b>Directivity</b>	$\pm 0.2$ dB in air (rotation around probe axis) $\pm 0.4$ dB in air (rotation normal to probe axis)
<b>Dynamic Range</b>	2 V/m to 1000 V/m (M3 or better device readings fall well below diode compression point)
<b>Linearity</b>	$\pm 0.2$ dB
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 4 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.5 mm



**Photo of E-field Probe**

#### 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).

## **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.

<b>Probe parameters :</b>	- 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>
<b>Device parameters :</b>	- Frequency	f
	- Crest factor	cf
<b>Media parameters :</b>	- Conductivity	σ
	- Density	ρ

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 :

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

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),  $\mu\text{V}/(\text{V/m})^2$  for E-field Probes

ConvF = sensitivity enhancement in solution

f = carrier frequency [GHz]

$E_i$  = electric field strength of channel i in V/m

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

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

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



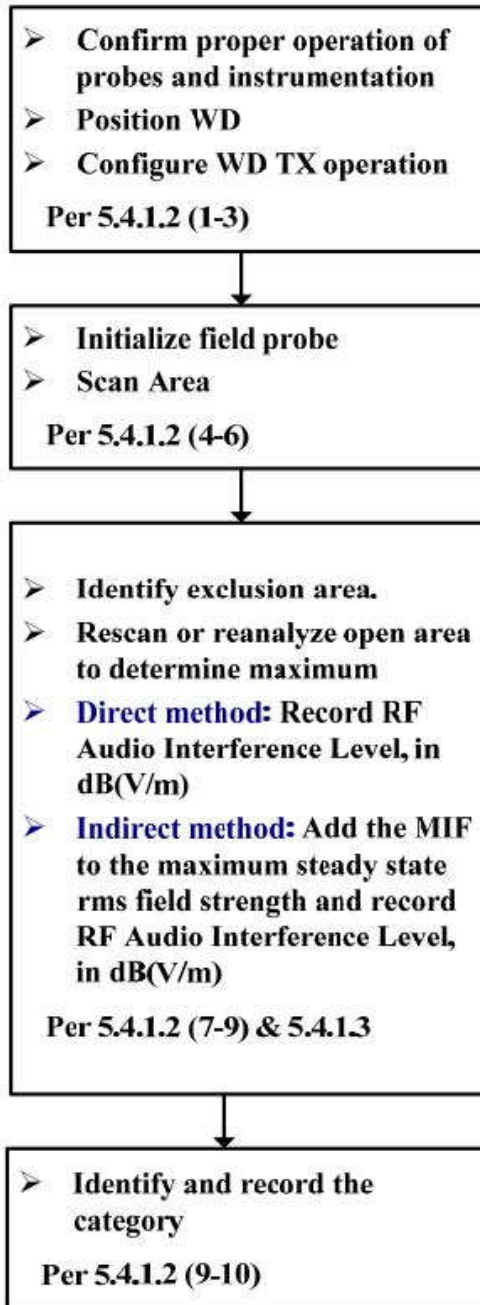


## **7. RF Emissions Test Procedure**

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.
- 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.
- l. For the T-Coil perpendicular measurement location is  $\geq 5.0$  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.

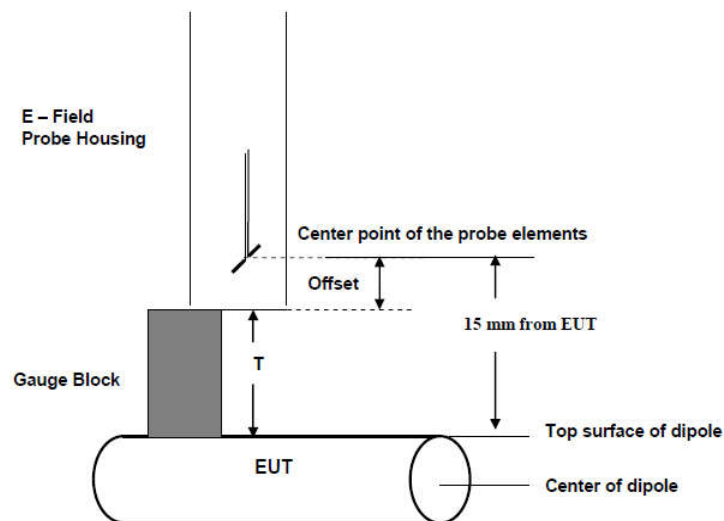
**Test Instructions**



**Figure 8.1 RF Emissions Flow Chart**



**Fig 8.2 EUT reference and plane for HAC RF emission measurements**



**Fig. 8.3 Gauge block with E-field probe**



## 8. Test Equipment List

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	835MHz Calibration Dipole	CD835V3	1184	Jan. 25, 2022	Jan. 24, 2023
SPEAG	1880MHz Calibration Dipole	CD1880V3	1170	Jan. 24, 2022	Jan. 23, 2023
SPEAG	2450MHz Calibration Dipole	CD2450V3	1158	Sep. 26, 2022	Sep. 25, 2023
SPEAG	Data Acquisition Electronics	DAE4	1664	May 30, 2022	May 29, 2023
SPEAG	Isotropic E-Field Probe	EF3DV3	4053	Jul. 27, 2022	Jul. 26, 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	6201300653	Jul. 07, 2022	Jul. 06, 2023
R&S	Base Station(Measure)	CMU200	108440	Dec. 28, 2021	Dec. 27, 2022
R&S	Base Station(Measure)	CMW500	157651	Dec. 29, 2021	Dec. 28, 2022
Anritsu	Power Sensor	MA2411B	1542004	Dec. 28, 2021	Dec. 27, 2022
Anritsu	Power Meter	ML2495A	1339473	Dec. 28, 2021	Dec. 27, 2022
R&S	Power Sensor	NRP50S	101254	Apr. 07, 2022	Apr. 06, 2023
Anritsu	Signal Generator	N5181A	MY50145381	Dec. 28, 2021	Dec. 27, 2022
Agilent	Dual Directional Coupler	778D	50422	NCR	NCR
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
R&S	Spectrum Analyzer	FSP7	100818	Jul. 07, 2022	Jul. 06, 2023
Anymetre	Thermo-Hygrometer	JR593	2015030904	Jul. 12, 2022	Jul. 11, 2023
Weinschel	Attenuator 1	3M-10	N/A	NCR	NCR
Weinschel	Attenuator 2	3M-20	N/A	NCR	NCR
SPEAG	Device Holder	N/A	N/A	NCR	NCR
ARRA	Power Divider	A3200-2	N/A	NCR	NCR
ET Industries	Dual Directional Coupler	C-058-10	N/A	NCR	NCR

**Note:**

1. NCR: "No-Calibration Required"
2. 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.
3. 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.

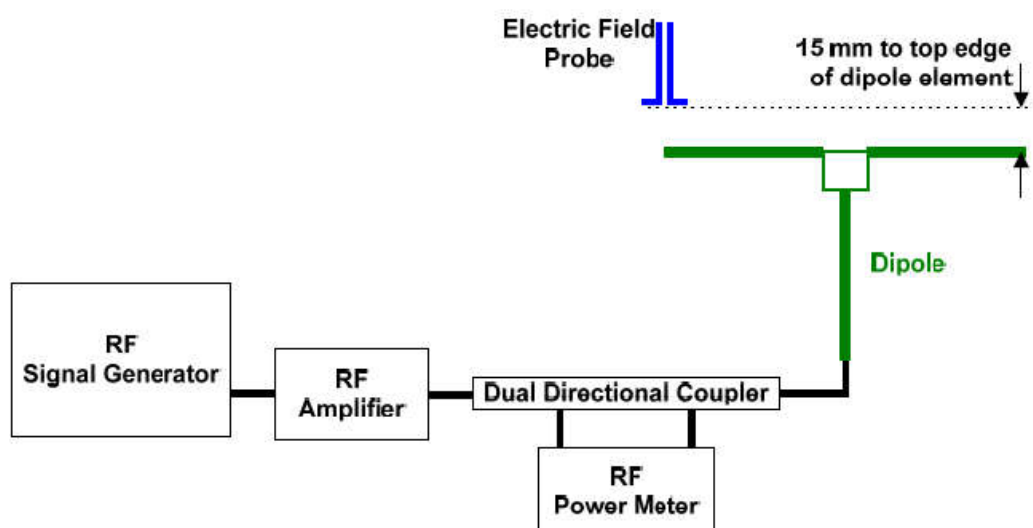
## 9. Measurement System Validation

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.

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	110.8	118.7	112.1	115.4	4.15	Nov. 11, 2022
1880	20	87.6	97.31	92.03	94.67	8.07	Nov. 11, 2022
2450	20	84.9	91.37	88.15	89.76	5.72	Nov. 18, 2022

## **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.

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 alternatively 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 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
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 Greenfield, 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
10671	IEEE 802.11ax (20MHz, MCS0, 90pc duty cycle)	-5.58

## 11. Low-power Exemption

<Max Tune-up Limit>

**ANT1:**

Frequency Band		Average Power (dBm)
GSM	GSM850	33.50
	EDGE850	28.00
	GSM1900	30.50
	EDGE1900	27.50
WCDMA	Band V	24.00
	Band IV	24.00
	Band II	24.00
	HSPA	23.00
FDD LTE	Band 2	24.00
	Band 4	24.00
	Band 5	24.00
	Band 12	24.00
	Band 13	24.00
	Band 14	24.00
	Band 30	24.00
	Band 66	24.00

**ANT2:**

Frequency Band		Average Power (dBm)
GSM	GSM850	30.00
	EDGE850	25.00
	GSM1900	25.50
	EDGE1900	22.50
WCDMA	Band V	22.00
	Band II	18.50
	HSPA	21.00
FDD LTE	Band 2	19.00
	Band 5	22.00
	Band 12	23.00
	Band 30	14.50

**ANT3:**

Frequency Band		Average Power (dBm)
2.4GHz WLAN	802.11b	19.30
	802.11g	18.60
	802.11n-HT20	19.20
	802.11n-HT40	19.20

**ANT4:**

Frequency Band		Average Power (dBm)
5GHz WLAN	802.11a	20.00
	802.11n-HT20	19.90
	802.11n-HT40	19.00
	802.11ac-VHT20	19.90
	802.11ac-VHT40	19.10
	802.11ac-VHT80	18.10



**<Low Power Exemption>**
**ANT1:**

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	28.00	3.75	31.75	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

**ANT2:**

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
GSM850	30.00	3.63	33.63	Yes
EDGE850	25.00	3.75	28.75	No <sup>(1)</sup>
GSM1900	25.50	3.63	29.13	Yes
EDGE1900	22.50	3.75	26.25	No <sup>(1)</sup>
WCDMA	22.00	-25.43	-3.43	No
WCDMA - HSPA	22.00	-20.39	1.61	No
LTE - FDD	23.00	-9.76	13.24	No

**ANT3:**

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
802.11b	19.30	-2.02	17.28	No <sup>(2)</sup>
802.11g	18.60	0.12	18.72	Yes
802.11n-HT20	19.20	-13.44	5.76	No
802.11n-HT40	19.20	-13.44	5.76	No

**ANT4:**

Air Interface	Max Average Antenna Input Power (dBm)	Worst Case MIF (dB)	Power + MIF(dB)	C63.19 test required
802.11a	20.00	-3.15	16.85	No
802.11n-HT20	19.90	-13.44	6.46	No
802.11n-HT40	19.00	-13.44	5.56	No
802.11ac-VHT20	19.90	-5.57	14.33	No
802.11ac-VHT40	19.10	-5.57	13.53	No
802.11ac-VHT80	18.10	-5.57	12.53	No

**General Note:**

- EDGE data modes is not necessary due the GSM Voice mode is the worst case.
- 802.11b is not necessary due to the 802.11g is the worst case.
- 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  $\leq 17$  dBm for any of its operating modes.
- HAC RF rating is M4 for the air interface which meets the low power exemption.

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

### <GSM>

Average Antenna Input Power(dBm)						
Band	GSM850 ANT1			GSM1900 ANT1		
Channel	128	189	251	512	661	810
Frequency (MHz)	824.2	836.4	848.8	1850.2	1880.0	1909.8
GSM (GMSK, 1 Tx slot)	32.18	32.14	32.17	29.41	29.38	29.44

Average Antenna Input Power(dBm)						
Band	GSM850 ANT2			GSM1900 ANT2		
Channel	128	189	251	512	661	810
Frequency (MHz)	824.2	836.4	848.8	1850.2	1880.0	1909.8
GSM (GMSK, 1 Tx slot)	28.16	28.10	28.16	23.59	23.61	23.54

### <WLAN>

2.4GHz WLAN	Mode	Channel	Frequency (MHz)	Average power (dBm)
	802.11g 6Mbps	1	2412	16.23
		6	2437	16.63
		11	2462	16.42

**13. HAC RF Emission Test Results**

Plot No.	Air Interface	Mode	Sample	Transmit Ant.	Channel	Average Antenna Input Power (dBm)	MIF	E-Field (dBV/m)	Margin to FCC M3 limit (dB)	E-Field M Rating
01	GSM850	Voice	1	Ant 1	128	32.18	3.63	40.29	4.71	M3
02	GSM850	Voice	1	Ant 1	189	32.14	3.63	39.65	5.35	M4
03	GSM850	Voice	1	Ant 1	251	32.17	3.63	38.59	6.41	M4
04	GSM850	Voice	1	Ant 2	128	28.16	3.63	42.74	2.26	M3
05	GSM850	Voice	1	Ant 2	189	28.1	3.63	42.71	2.29	M3
06	GSM850	Voice	1	Ant 2	251	28.16	3.63	42.64	2.36	M3
07	GSM1900	Voice	1	Ant 1	512	29.41	3.63	34.68	0.32	M3
08	GSM1900	Voice	1	Ant 1	661	29.38	3.63	34.69	0.31	M3
09	GSM1900	Voice	2	Ant 1	661	29.38	3.63	32.62	2.38	M3
10	GSM1900	Voice	1	Ant 1	810	29.44	3.63	34.07	0.93	M3
11	GSM1900	Voice	1	Ant 2	512	23.59	3.63	34.41	0.59	M3
12	GSM1900	Voice	1	Ant 2	661	23.61	3.63	33.65	1.35	M3
13	GSM1900	Voice	1	Ant 2	810	23.54	3.63	32.78	2.22	M3
14	WLAN2.4GHz	802.11g 6Mbps	1	Ant 3	1	16.23	0.12	30.03	4.97	M3
15	WLAN2.4GHz	802.11g 6Mbps	1	Ant 3	6	16.63	0.12	29.71	5.29	M4
16	WLAN2.4GHz	802.11g 6Mbps	1	Ant 3	11	16.42	0.12	29.57	5.43	M4

**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 uncertainty may generally be categorized according to the methods used to evaluate them. The evaluation of uncertainty 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.

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.

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

**Table 14.1 Uncertainty Budget of HAC free field assessment**



## **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.
- [2] FCC KDB 285076 D01v06r02, "Equipment Authorization Guidance for Hearing Aid Compatibility", September 19, 2022
- [3] FCC KDB 285076 D03v01r06, "Hearing aid compatibility frequently asked questions", July 20, 2022.
- [4] SPEAG DASY System Handbook

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