RF Exposure Report

Application No.:	FYCR2204000089AT
Applicant:	Armatura LLC
Address of Applicant:	190 Bluegrass Valley Parkway Alpharetta, GA 30005, USA
Manufacturer:	Armatura LLC
Address of Manufacturer:	190 Bluegrass Valley Parkway Alpharetta, GA 30005, USA
Factory:	Armatura Tech Co., Ltd
Address of Factory:	1. 999/43 Moo 15 Bangsaothong, Samutprakarn 10570, Thailand 2. 999/120-121 Moo15 Bangsaothong, Samutprakarn 10570, Thailand
Equipment Under Test (EUT):	
EUT Name:	Smart Reader
Model No.:	EP10C
Trade Mark:	ARMATURA
FCC ID:	2A5UQ-EP10C
Standard(s) :	FCC Rules 47 CFR §2.1093 KDB 447498 D04 interim General RF Exposure Guidance v01
Date of Receipt:	2022-03-07
Date of Test:	2022-03-23 to 2022-04-24
Date of Issue:	2022-04-26
Test Result:	**Pass***

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

Kidd Yang
EMC Laboratory Manager

Revision Record				
Version	**Chapter**	**Date**	**Modifier**	**Remark**
01		2022-04-26		Original

Authorized for issue by:				
		Tree Zhan **Tree Zhan/Project Engineer**		
		Winkey Wang **Winkey Wang/Reviewer**		

1 Contents

2 General Information

2.1 General Description of E.U.T.

Product Type:	☐ Portable device
	☒ Mobile device
	☐ Fixed device

2.2 Details of E.U.T.

Power supply:	DC 9-24V
BLE	
Operation Frequency:	2402MHz to 2480MHz
Modulation Type:	GFSK
Number of Channels:	40
Date Rate:	1MBps, 2Mbps
Channel Spacing:	2MHz
Antenna Type:	PCB Antenna
Antenna Gain:	2.3dBi
125kHz	
Operation Frequency:	125kHz
Modulation Type:	ASK
Antenna Type:	Loop Antenna
NFC	
Operation Frequency:	13.56MHz
Modulation Type:	ASK
Antenna Type:	Loop Antenna

2.3 Separation Distance

Minimum test separation distance:	20cm
Remark: 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.	

2.4 Test Location

All tests were performed at:

Compliance Certification Services（Kunshan）Inc. Shenzhen branch.

Fuyong lab. Xinlong TechnoPark,Fengtang Road, Fuyong Subdistrict, Bao'an, Shenzhen, China

Tel: +86 755 8866 3988 Fax: +86 755 2671 0594

No tests were sub-contracted.

2.5 Test Facility

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

• A2LA (Certificate No. 6606.01)

Compliance Certification Services（Kunshan）Inc. Shenzhen branch is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 6606.01.

• FCC –Designation Number: CN1322

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

Designation Number: CN1322. Test Firm Registration Number: 718073

• Innovation, Science and Economic Development Canada

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

CAB identifier: CN0129.

IC#: 28189.

3 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.

3.1 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.

3.2 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	3.83 R^2
300	–	1,500	159 mm	–	31.8 mm	0.0128 R^2f
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 λ/2π. The thresholds are

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_{20cm} in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

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

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 λ/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.

3.3 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 λ/4.

As for devices with antennas of length greater than λ/4 where the gain is not well defined, but always less than that of a half-wave dipole (length λ/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.

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).

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

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_{20cm} is per Formula (B.1).

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)
0.3~1.5	**0.01356**	-1.270	**20**	**27.662**
1.5~6	**2.48**	1.905	**20**	**3060.000**

4 Measurement and Calculation

4.1 Maximum transmit power

BLE:

Frequency	EIRP [dBm]	EIRP (mW)
2440MHz	6.21	4.18

125KHz :

Frequency	Level@3m(dBuV/m)	ERP (mW)
125KHz	67.37	0.001

13.56MHz :

Frequency	Level@3m(dBuV/m)	ERP (mW)
13.56MHz	58.19	0.00012

The Power Data is based on the RF Test report FYCR220400008901 & FYCR220400008902&FYCR220400008903.

The ERP calculation formula for 125kHz and 13.56MHz transmitters:

*Note: ERP = $p_t \times g_t = (E \times d)^{*2}/49.2$ (According to ANSI C63.10 Annex G.2).

where

p_t is the transmitter output power in watts

g_t is the numeric gain of the transmitting antenna (dimensionless)

E is the electric field strength in V/m

d is the measurement distance in meters (m)

V/m =10^(((dBuV/m) -120) / 20)

4.2 RF Exposure Calculation

Exposure condition for standalone operations

For BLE transmitter:
The Max. Power is 4.18mW. The best case gain of the antenna is 2.3dBi.

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

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	N/A	N/A
☐	MPE-based Exemption(ERP)	N/A	N/A
☒	SAR-based Exemption(P_{th})	3060	Yes

For 125KHz transmitter:
The max. ERP is 0.001mW.

	Evaluation method	Exempt Limit(mW)	Verdict
☒	Blanket 1 mW Blanket Exemption	1.0	Yes
☐	MPE-based Exemption(ERP)	N/A	N/A
☐	SAR-based Exemption(P_{th})	N/A	N/A

For 13.56MHz transmitter:
The max. ERP is 0.00012mW.

	Evaluation method	Exempt Limit(mW)	Verdict
☒	Blanket 1 mW Blanket Exemption	1.0	Yes
☐	MPE-based Exemption(ERP)	N/A	N/A
☐	SAR-based Exemption(P_{th})	N/A	N/A

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

Exposure condition for simultaneous transmission operations

Either SAR-based or MPE-based exemption may be considered for test exemption for fixed, mobile, or portable device exposure conditions; therefore, the contributions from each exemption in conjunction with the measured SAR (Evaluatedk term) shall be used to determine exemption for simultaneous transmission according to Formula (C.1) [repeated from § 1.1307(b)(3)(ii)(B)].

$$\sum_{i=1}^{a}\frac{P_i}{P_{\mathrm{th},i}}+\sum_{j=1}^{b}\frac{ERP_j}{ERP_{\mathrm{th},j}}+\sum_{k=1}^{c}\frac{Evaluated_k}{Exposure\ Limit_k}\leq 1 \qquad (C.1)$$

Remark:

a -number of fixed, mobile, or portable RF sources claiming exemption using the §1.1307(b)(3)(i)(B) formula for Pth, including existing exempt transmitters and those being added.

b -number of fixed, mobile, or portable RF sources claiming exemption using the applicable § 1.1307(b)(3)(i)(C) Table 1 formula 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.

Pi -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).

Pth,i -the exemption threshold power (Pth) according to the § 1.1307(b)(3)(i)(B) formula for fixed, mobile, or portable RF source i.

ERPj -the available maximum time-averaged power or the ERP, whichever is greater, of fixed, mobile, or portable RF source j.

ERPth,j -exemption threshold ERP for fixed, mobile, or portable RF source j, at a distance of at least λ/2π, according to the applicable § 1.1307(b)(3)(i)(C) Table 1 formula at the location in question.

$Evaluated_k$ -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.

$Exposure\ Limit_k$ -either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable sources, as applicable

The sum of the ratios = 0.001mW/1mW + 0.00012mW/1mW + 4.18mW/3060mW = 0.0025 < 1

Therefore, the device is to qualify for simultaneous transmission SAR test exemption, the exemption report is in lieu of the SAR report.

--End of the Report--