RF EXPOSURE EVALUATION REPORT

Application No.:	SZCR2307002309AT
Applicant:	Standard Euler, Inc.
Address of Applicant:	479 Jessie Street San Francisco California 94103 United States
Manufacturer:	Jetta Company Limited
Address of Manufacturer:	19 On Kui St., On Lok Tsuen, Fanling, NT, HK, Hong Kong
Equipment Under Test (EUT):	
EUT Name:	Vent
Model No.:	VENT 6x10, VENT-6x12, VENT-6x14, VENT-8x8, VENT-10x10, VENT-12x12 ♣
♣	Please refer to section 2 of this report which indicates which model was actual tested and which were electrically identical.
Trade Mark:	Flair
FCC ID:	2AK78VENTO
Standard(s) :	FCC Rules 47 CFR §2.1091 KDB 447498 D04 interim General RF Exposure Guidance v01
Date of Receipt:	2023-07-18
Date of Evaluation:	2023-08-29 to 2023-09-18
Date of Issue:	2023-09-22
Evaluation Result:	**Pass***

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

Keny Xu
EMC Laboratory Manager

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Revision Record				
Version	**Chapter**	**Date**	**Modifier**	**Remark**
01		2023-09-22		Original

Authorized for issue by:				
		Leo Li **Leo Li/Project Engineer**		
		Eric Fu **Eric Fu/Reviewer**		

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2 Contents

3 General Information

3.1 General Description of E.U.T.

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

3.2 Details of E.U.T.

Power supply:	3.0V DC (2 x alkaline C cell batteries)
Operation Frequency	915MHz
Channel Numbers:	1
Modulation Type:	GFSK
Antenna Gain:	4.1dBi
Antenna Type:	Planar Inverted-F Antenna

Remark: The information in this section is provided by the applicant or manufacturer, CCS is not liable to the accuracy, suitability, reliability or/and integrity of the information.

Declaration of EUT Family Grouping:

Model No.: VENT 6x10, VENT-6x12, VENT-6x14, VENT-8x8, VENT-10x10, VENT-12x12

Only the model VENT 6x14, VENT-8x8, VENT-10x10, VENT-12x12, was valuated, since according to the declaration from the applicant, the electrical circuit design, PCB layout, components used and internal wiring and functions were identical for the above models, with only difference on as below.

a: Mechanical dimensions
b: Antenna matching circuit, consisting of a capacitor and an inductor

Model&different	VENT 4x10	VENT-4x12	VENT-4x14	VENT 6x10	VENT-6x12	VENT-6x14	VENT-8x8	VENT-8x10	VENT-10x10	VENT-12x12
VENT 4x10	\	a	a	ab	ab	ab	ab	ab	ab	ab
VENT-4x12	a	\	a	ab	ab	ab	ab	ab	ab	ab
VENT-4x14	a	a	\	ab	ab	ab	ab	ab	ab	ab
VENT 6x10	ab	ab	ab	\	a	a	ab	ab	ab	ab
VENT-6x12	ab	ab	ab	a	\	a	ab	ab	ab	ab
VENT-6x14	ab	ab	ab	a	a	\	ab	ab	ab	ab
VENT-8x8	ab	ab	ab	ab	ab	ab	\	ab	ab	ab
VENT-8x10	ab	ab	ab	ab	ab	ab	ab	\	ab	ab
VENT-10x10	ab	ab	ab	ab	ab	ab	ab	ab	\	ab
VENT-12x12	ab	ab	ab	ab	ab	ab	ab	ab	ab	\

3.3 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.	

3.4 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen Branch

No. 1 Workshop, M-10, Middle Section, Science & Technology Park, Nanshan District, Shenzhen, Guangdong, China. 518057.

Tel: +86 755 2601 2053 Fax: +86 755 2671 0594

No tests were sub-contracted.

3.5 Test Facility

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

- **A2LA (Certificate No. 3816.01)**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

- **VCCI (Member No. 1937)**

The 3m Fully-anechoic chamber for above 1GHz, 10m Semi-anechoic chamber for below 1GHz, Shielded Room for Mains Port Conducted Interference Measurement and Telecommunication Port Conducted Interference Measurement of SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen EMC laboratory have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-20026, R-14188, C-12383 and T-11153 respectively.

- **FCC –Designation Number: CN1336**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1336. Test Firm Registration Number: 787754.

- **Innovation, Science and Economic Development Canada**

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006.

IC#: 4620C.

3.6 Deviation from Standards

None

3.7 Abnormalities from Standard Conditions

None

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	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)].

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

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.

Limit calculation			
Frequency range	Frequency(MHz)	R(λ/2π)(m)	Threshold ERP(W)
300~1500MHz	**915**	0.0522	0.032
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 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).

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

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_{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	**0.915**	1.474	**0.5**	**8.133**
1.5~6	**2.48**	1.905	**0.5**	**2.717**

5 Measurement and Calculation

5.1 Maximum transmit power

For VENT-6x14:

The Power Data is based on the RF Test Report SZCR230700230901.
The Max. power (including tune-up tolerance) is -8.63dBm on the channel 0.915GHz(*)
-5.08dBm logarithmic terms convert to numeric result is nearly 0.137mW

For VENT-8x8:

The Power Data is based on the RF Test Report SZCR230700230901.
The Max. power (including tune-up tolerance) is -10.84dBm on the channel 0.915GHz(*)
-5.08dBm logarithmic terms convert to numeric result is nearly 0.083mW

For VENT-10x10:

The Power Data is based on the RF Test Report SZCR230700230901.
The Max. power (including tune-up tolerance) is -6.09dBm on the channel 0.915GHz(*)
-5.08dBm logarithmic terms convert to numeric result is nearly 0.246mW

For VENT-12x12:

The Power Data is based on the RF Test Report SZCR230700230901.
The Max. power (including tune-up tolerance) is -6.38dBm on the channel 0.915GHz(*)
-5.08dBm logarithmic terms convert to numeric result is nearly 0.230mW

Note: EIRP = pt × gt = (E×d)*2/49.2 (According to ANSI C63.10 Annex G.2).
ERP=EIRP-2.15dB
where
pt is the transmitter output power in watts
gt 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)

5.2 RF Exposure Calculation

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

	Evaluation method	Exempt Limit(mW)	Verdict
☒	Blanket 1 mW Blanket Exemption	1mW	Yes
☐	MPE-based Exemption(ERP)	7mW(ERP)	N/A
☐	SAR-based Exemption(P_{th})	3060	N/A

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

--End of the Report--