RF Exposure Evaluation Declaration

FCC ID:	Z9G-EDF201
Applicant:	Edifier International Limited
Product:	True Wireless Noise Cancellation Earbuds Headphones
Model No.:	EDF200117
Brand Name:	EDIFIER
FCC Rule Part(s):	FCC Part 2.1093
Result:	Complies

Reviewed By: Sunny Sun

Approved By: Robin Wu

Revision History

Report No.	Version	Description	Issue Date	Note
2302RSZ025-U4	V01	Initial Report	2023-03-10	Invalid
2302RSZ025-U4	V02	Revise the SAR Test Exclusion Threshold	2023-03-15	Valid

CONTENTS

1. General Information

1.1. Applicant

Edifier International Limited

P.O. Box 6264 General Post Office Hong Kong

1.2. Manufacturer

Beijing Edifier Technology Co., Ltd.

8th floor, ZuoAn Building, NO.68 BeiSiHuanXiLu, Haidian District, Beijing 100080, CHINA

1.3. Testing Facility

☐	**Test Site – MRT Suzhou Laboratory**				
	Laboratory Location (Suzhou - Wuzhong) D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China **Laboratory Location (Suzhou - SIP)** 4b Building, Liando U Valley, No.200 Xingpu Rd., Shengpu Town, Suzhou Industrial Park, China				
	Laboratory Accreditations				
	A2LA: 3628.01		CNAS: L10551		
	FCC: CN1166		ISED: CN0001		
	VCCI:	☐R-20025	☐G-20034	☐C-20020	☐T-20020
		☐R-20141	☐G-20134	☐C-20103	☐T-20104
☐	**Test Site – MRT Shenzhen Laboratory**				
	Laboratory Location (Shenzhen) 1G, Building A, Junxiangda Building, Zhongshanyuan Road West, Nanshan District, Shenzhen, China				
	Laboratory Accreditations				
	A2LA: 3628.02		CNAS: L10551		
	FCC: CN1284		ISED: CN0105		
☐	**Test Site – MRT Taiwan Laboratory**				
	Laboratory Location (Taiwan) No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.)				
	Laboratory Accreditations				
	TAF: L3261-190725				
	FCC: 291082, TW3261		ISED: TW3261		

1.4. Product Information

Product	True Wireless Noise Cancellation Earbuds Headphones
Model No.	EDF200117
Bluetooth Specification	Bluetooth 5.3 (Dual Mode)
Working Voltage (Earbuds)	Battery (3.85V DC)
Antenna Information	Refer to Section 1.5
Note: The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer.	

1.5. Antenna Information

Frequency Range	2402~2480MHz
Antenna Type	Chip Antenna
Antenna Gain	Left Earbud Gain: -1.6dBi Right Earbud Gain: -3.0dBi

1.6. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 2.1093 & KDB 447498 D04 Interim General RF Exposure Guidance v01

1.7. Device Classification

According to the user manual, the device is classified as a Portable Device. So, the RF exposure evaluation requirements of § 2.1093 for portable device exposure conditions subject to MPE limits.

2. RF Exposure Evaluation

2.1. Limits

According to FCC §1.1310: The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency (RF) radiation as specified in §1.1307(b)

Limits For Maximum Permissible Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm^2)	Average Time (Minutes)
(A) Limits for Occupational/ Control Exposures				
0.3-3.0	614	1.63	*(100)	≤6
3.0-30	1842/f	4.89/f	*($900/f^2$)	<6
30-300	61.4	0.163	1.0	<6
300-1,500	--	--	f/300	<6
1,500-100,000	--	--	5	<6
(B) Limits for General Population/ Uncontrolled Exposures				
0.3-1.34	614	1.63	*(100)	<30
1.34-30	824/f	2.19/f	*($180/f^2$)	<30
30-300	27.5	0.073	0.2	<30
300-1,500	--	--	f/1500	<30
1,500-100,000	--	--	1.0	<30

f= frequency in MHz. * = Plane-wave equivalent power density.

2.2. MPE Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(ii)(A) of this section.
Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

$\mathrm{P\,th(mW)} = \{\mathrm{ERP_{20cm}(d\,/\,20cm)^{x}}$ d ≤ 20cm

$\mathrm{P\,th(mW)} = \{\mathrm{ERP_{20cm}}$ 20cm < d ≤ 40cm

Where

$\mathrm{x} = -\log_{10}\left(\frac{60}{\mathrm{ERP_{20cm}}\sqrt{\mathrm{f}}}\right)$ and f is in GHz;

and

$\mathrm{ERP_{20cm}(mW)} = \{2040\mathrm{f}$ 0.3GHz ≤ f < 1.5GHz

$\mathrm{ERP_{20cm}(mW)} = \{3060$ 1.5GHz ≤ f ≤ 6GHz

(Option C) Or using Table 1 and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, R must be at least λ/2π, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP 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 (1.64 linear value).

Table 1 to §1.1307(b)(3)(i)(C) - Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	$1920R^2$
1.34-30	$3450R^2/f^2$
30-300	$3.83R^2$
300-1,500	$0.0128R^2f$
1,500-100,000	$19.2R^2$

For multiple RF sources: Multiple RF sources are exempt if:

(A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those is paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(B) in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

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

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th}, including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section 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 including existing evaluated transmitters.

$\boldsymbol{P_i}$ = 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).

$\boldsymbol{P_{th,i}}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source *i*.

$\boldsymbol{ERP_j}$ = the ERP of fixed, mobile, or portable RF source *j*.

ERP$_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source *j*, at a distance of at least λ/2π according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

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 at the location of exposure.

Exposure Limit$_k$ = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source *k*, as applicable from §1.1310 of this chapter.

2.3. Calculation Result

Product	True Wireless Noise Cancellation Earbuds Headphones
Test Item	RF Exposure Evaluation

Test Mode	Frequency Range (MHz)	Max. Conducted Power or ERP (dBm)	Tune-up Conducted Power or ERP (dBm)	Tune-up Conducted Power or ERP (mW)	SAR Test Exclusion Threshold (mW)
Bluetooth	2402 ~ 2480	2.44	3	2	2.77

Note 1: Tune-up tolerance was declared by manufacturer.

Note 2: The minimum distance between antenna and enclosure is 1mm. A distance of 5mm is applied to determine RF exposure exemption.

For single RF source, Option B

Therefore, the device qualifies for RF exposure exemption.