SAR TEST EXCLUSION EVALUATION REPORT

BT voice remote controller
N/A
HS-9A
25032616856RFC-2
FCC 47 CFR Part 2.1093
RSS-102 Issue 6
2ANM3HS9A
23165-HS9A
PASS
May 19, 2025

Prepared for:

Shenzhen Chuangwei-RGB Electronics Co., Ltd. 13F-16F, Unit A, Skyworth Building, Shennan Road South, Nanshan District, Shenzhen, Guangdong, China

Prepared by:

Shenzhen UnionTrust Quality and Technology Co., Ltd. 16/F, Block A, Building 6th, Baoneng Science and Technology Park, Longhua Street, Longhua District, Shenzhen, China TEL: +86-755-2823 0888 FAX: +86-755-2823 0886

Prepared by:

Parid Chen

Double Chern

David Chen Senior Project Engineer

Approved by:

Billy Li

Technical Director

Reviewed by:

Kevin Liang Assistant Manager

Date:

May 19, 2025

Shenzhen UnionTrust Quality and Technology Co., Ltd.

Address: 16/F, Block A, Building 6th, Baoneng Science and Technology Park, Longhua Street, Longhua District, Shenzhen, China Tel: +86-755-28230888 Fax: +86-755-28230886 E-mail: info@uttlab.com <u>http://www.uttlab.com</u> <u>UTTR-RF-RSS102-V1.1</u>

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Shenzhen UnionTrust Quality and Technology Co., Ltd.

 Address: 16/F, Block A, Building 6th, Baoneng Science and Technology Park, Longhua Street, Longhua District, Shenzhen, China

 Tel: +86-755-28230888
 Fax: +86-755-28230886
 E-mail: info@uttlab.com
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1. GENERAL INFORMATION

Applicant: Shenzhen Chuangwei-RGB Electronics Co., Ltd.						
Address of Applicant:	13F-16F, Unit A, Skyworth Building, Shennan Road South, Nanshan District, Shenzhen, Guangdong, China					
Manufacturer:	Shenzhen Chuangwei-RGB Electronics Co., Ltd.					
Address of Manufacturer:	13F-16F, Unit A, Skyworth Building, Shennan Road South, Nanshan District, Shenzhen, Guangdong, China					

1.2 EUT INFORMATION

Product Name:	BT voice remote controller					
Model No. /HVIN:	HS-9A					
Trade Mark:	N/A					
DUT Stage:	Identical Prototype					
EUT Supports Function: (Provided by the customer)	2.4 GHz ISM Band: Bluetooth 5.1					
Software Version:	HS-9A00-20240711-1520 (Provided by the customer)					
Hardware Version:	HOF-24C-CW24TLS-V1.0 (Provided by the customer)					
Sample Received Date:	March 26, 2025					
Note: 1. The ISED certification is only for the main model.						

Remark: The above EUT's information was provided by customer. Please refer to the specifications or user's manual for more detailed description.

1.3 PRODUCT SPECIFICATION SUBJECTIVE TO THIS STANDARD

For BT_EDR	
Frequency Band:	2400 MHz to 2483.5 MHz
Frequency Range:	2402 MHz to 2480 MHz
Bluetooth Version:	Bluetooth LE
Modulation Technique:	Frequency Hopping Spread Spectrum(FHSS)
Type of Modulation:	GFSK, π/4DQPSK, 8DPSK
Number of Channels:	79
Channel Separation:	1 MHz
Antenna Type:	PCB Antenna
Antenna Gain: (Provided by the customer)	-1.8 dBi
Maximum Conducted Peak Power:	-0.86 dBm

1.4OTHER INFORMATION

Type of Modulation	Tx/Rx Frequency	Test RF Channel Lists			
GFSK		Lowest(L)	Middle(M)	Highest(H)	
	2402 MHz to 2480 MHz	Channel 0	Channel 19	Channel 39	
		2402 MHz	2440 MHz	2480 MHz	

1.5 GENERAL DESCRIPTION OF APPLIED STANDARDS

The EUT is a RF product, according to the specifications of the manufacturers. It must comply with the requirements of the following standards:

FCC 47 CFR Part 2.1093 RSS-102 Issue 6

All test items have been performed and recorded as per the above standards

1.6 DEVIATION FROM STANDARDS

None.

1.7 ABNORMALITIES FROM STANDARD CONDITIONS

None.

1.8 OTHER INFORMATION REQUESTED BY THE CUSTOMER

None.

2. EQUIPMENT LIST

Please refer to the RF test report.

3. SAR TEST EXCLUSION EVALUATION 3.1 REFERENCE DOCUMENTS FOR EVALUATION

No.	Identity	Document Title							
1	FCC 47 CFR Part 2.1093	Radiofrequency radiation exposure evaluation: portable devices.							
2	RSS-102 Issue 6	Radio Frequency (RF) Exposure Compliance of Radio communication Apparatus (All Frequency Bands)							
3	KDB 447498 D04 Interim General RF Exposure Guidance v01	RF EXPOSURE PROCEDURES AND EQUIPMENT AUTHORIZATION POLICIES FOR MOBILE AND PORTABLE DEVICES							

3.2 EXEMPTION LIMITS FOR ROUTINE EVALUATION – SAR EVALUATION 3.2.1 SAR Test Exclusion Threshold

3.2.1.1 KDB 447498 D04

According to KDB 447498 D04, 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.

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.

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).

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

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

where

P

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

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

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

Shenzhen UnionTrust Quality and Technology Co., Ltd.

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3.2.1.2 RSS-102 Issue 6

According to RSS-102 Issue 6, Devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table 11, based on the separation distance, are exempt from SAR evaluation. The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply.

When the operating frequency of the device is between two frequencies located in table 11, linear interpolation shall be applied for the applicable separation distance. If the separation distance of the device is between two distances located in table 11, linear interpolation may be applied for the applicable frequency. Alternatively, the limit corresponding to the smaller distance may be employed. For example, in case of a 7 mm separation distance, either use the exception value for a 5 mm separation distance or interpolate between the limits corresponding to 5 mm and 10 mm separation distances.

Frequenc	≤5mm	10	15	20	25	30	35	40	45 mm	> 50 mm
y (MHz)	(mW)	mm (mW)	(mW)	(mW)						
≤ 300	45	116	139	163	189	216	246	280	319	362
450	32	71	87	104	124	147	175	208	248	296
835	21	32	41	54	72	96	129	172	228	298
1900	6	10	18	33	57	92	138	194	257	323
2450	3	7	16	32	56	89	128	170	209	245
3500	2	6	15	29	50	72	94	114	134	158
5800	1	5	13	23	32	41	54	74	102	128

Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance

3.2.2 Test Procedure

Software provided by client enabled the EUT to transmit and receive data at lowest, middle and highest channel individually.

3.3 MPE CALCULATION RESULTS

Note: For the test results, the EUT had been tested with all conditions. But only the worst case was shown in test report.

3.3.1.1 Antenna Type:

PCB Antenna

3.3.1.2 Antenna Gain:

2402MHz to 2480 MHz: -1.8 dBi

3.3.1.3 Results for FCC 47 CFR Part 2.1093

Operating Mode	Frequency	Tune-up Power (conducted average)	Tolerance	Antenna Gain	Calculated maximum EIRP		Separation Distance	SAR Test Exclusion Threshold
	(MHz)	(dBm)	(dBm)	(dBi)	(dBm)	(mW)	(mm)	(mW)
LE	2402-2480	-2	1.0	-1.8	-2.8	0.5248	5	3

So the transmitter complies with the RF exposure requirements and the SAR is not required.

3.3.1.4 Results for RSS-102 Issue 6

Operating Mode	Frequency	Tune-up Power (conducted average)	ToleranceAntenna GainCalculated maximum EIRPSeparation Distance		maximum		SAR Test Exclusion Threshold	
	(MHz)	(dBm)	(dBm)	(dBi)	(dBm)	(mW)	(mm)	(mW)
LE	2402-2480	-2	1.0	-1.8	-2.8	0.5248	5	3

So the transmitter complies with the RF exposure requirements and the SAR is not required.



APPENDIX 1 PHOTOS OF TEST SETUP

N/A

APPENDIX 2 PHOTOS OF EUT CONSTRUCTIONAL DETAILS

Refer to Appendix 2 for EUT external and internal Photos.

*** End of Report ***

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