

## RF EXPOSURE REPORT



**FCC Applicant:** LEDGER SAS  
1 rue du Mail, 75002 Paris, France  
**Product Name:** LEDGER STAX  
**Brand Name:** L or LEDGER  
**Model No.:** 2103  
**Model Difference:** N/A  
**Report Number:** TESA2212000574E5  
**FCC ID** 2ASAL-2103  
**Issue Date:** Jan. 09, 2023

Approved By

John Yeh

**We hereby certify that:**

The above equipment was evaluated by SGS Taiwan Ltd. The evaluation in this report is in compliance with FCC KDB 447498 D01 v06.

The results of this report relate only to the sample identified in this report.

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## Revision History

Report Number	Revision	Description	Issue Date	Revised By	Remark
TESA2212000574E5	00	Original	Jan. 09, 2023	Kimmy Chiou	

**Note:**

- 1、The remark "\*" indicates modification of the report upon requests from certification body.

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## 1 DESCRIPTION OF EQUIPMENT UNDER TEST (EUT)

### 1.1 Product Description

Product Name:	LEDGER STAX
Brand Name:	L or LEDGER
Model No.:	2103

### 1.2 Reference Test Report

Test Lab:	SGS Taiwan Ltd
Report Number:	TERF2212002634E2, TERF2212002635E2

### 1.3 Antenna Information:

Mode	Freq. Range (MHz)	Channels	Modulation Technology	Max Output Power (dBm)	Antenna Gain (dBi)	Antenna Directional Gain (dBi)	EIRP (dBm)
BLE	2402-2480	40	GFSK	0	-3.71	N/A	-3.71

The antenna information is provided by the applicant.

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## 2 RF EXPOSURE EVALUATION FOR PORTABLE CONDITIONS

### 2.1 FCC Standard Applicable:

According to §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

#### 2.1.1 As per KDB 447498 D01 4.3.1,

**Step a:** For 100 MHz to 6 GHz and test separation distances  $\leq 50$  mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot \sqrt{f(\text{GHz})} \leq 3.0$  for 1-g Head & Body SAR and  $\leq 7.5$  for 10-g extremity Hand SAR, where

- $f(\text{GHz})$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- The values 3.0 and 7.5 are referred to as numeric thresholds in **step b)** below

**Step b:** For 100 MHz to 6 GHz and test separation distances  $> 50$  mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following (also illustrated in Appendix B):

- 1)  $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)]\}$  mW, for 100 MHz to 1500 MHz
- 2)  $\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$  mW, for  $> 1500$  MHz and  $\leq 6$  GHz

**Step c:** For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):

- 1) For test separation distances  $> 50$  mm and  $< 200$  mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by  $[1 + \log(100/f(\text{MHz}))]$
- 2) For test separation distances  $\leq 50$  mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by  $\frac{1}{2}$
- 3) SAR measurement procedures are not established below 100 MHz

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## 2.2 Measurement Result:

### Step a:

This is a portable device and the max. output power including tune-up tolerance is 1 (mW), lower than the threshold given and derived as formula given above, where

$$=1(\text{mW})/5(\text{mm}) \cdot \sqrt{2.402(\text{GHz})} = 0.31 < 3.0$$

Frequency (MHz)	Max. output power including tune-up tolerance(dBm)	Max. output power including tune-up tolerance(mW)	Distance (mm)	Result	≤ 3.0 for 1-g SAR
2402	0	1	5	0.310	TRUE

As the result of calculation result indicates, the RF exposure generating from given transmitter (transmitter employed digital modulation) can be excluded from SAR measurement, and is deemed compliant with RF exposure as per FCC.

### NFC

Frequency (MHz)	E-FIELD dBuV/m	Test Distance (m)	EIRP (dBm)	EIRP (mW)
13.56	12.4	30	-62.75757	0.0000005

### Note:

$$\text{EIRP (dBm)} = (\text{E-FIELD(dBuV/m)} + 20\log(d(\text{m})) - 104.7$$

$$\text{EIRP(mW)} = (10^{(\text{EIRP(dBm)}/10)})$$

Based on KDB447498D01v06 4.3.1 c), SAR test exclusion threshold for NFC (13.56MHz) shall be evaluated as below,

- For test separation distances ≤ 50 mm, the power threshold determined by the equation in 4.3.1 c) 1) for 50 mm and 100 MHz is multiplied by ½
- The power threshold at 50mm/100 MHz in 4.3.1 b) is multiplied by [1 + log(100/f(MHz))] where f is 13.56MHz

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c) The power threshold in 4.3.1 b) is [Power allowed at numeric threshold for 50 mm in 4.3.1 a)] + [(test separation distance – 50 mm)·(f(MHz)/150)] mW, for 100 MHz to 1500 MHz where test separation distance is 50mm, frequency is 100MHz.

d) Power allowed at numeric threshold for 50 mm in 4.3.1 a) is  $[3/\sqrt{f_{\text{(GHz)}}}] \cdot (\text{test separation distance})$

Hence, SAR test exclusion threshold is calculated in reverse sequence:

d) :  $[3/\sqrt{0.1}] \cdot 50 = 474.3416\text{mW}$

c) :  $474.3416 + (50-50) \cdot (100/150) = 474.3416\text{mW}$

b) :  $474.3416 \cdot [1 + \log(100/13.56)] = 885.9470\text{mW}$

a) :  $885.9470 \cdot 0.5 = 442.974\text{mW}$

So the SAR test exclusion power threshold for NFC(13.56MHz) is 442.974mW(equal to 26.464dBm).

Also, the maximum power of NFC is -62.76dBm which is far below the exclusion threshold (26.464dBm), so SAR test for NFC can be excluded.

*~ End of Report ~*

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