

Response to Inquiry to FCC (Tracking Number 782646)

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主题：Response to Inquiry to FCC (Tracking Number 782646)
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Inquiry on 06/02/2026 :

Inquiry:
Dear Madam/Sir

We have a case about WPT (Specification: 115 206 kHz, 360 kHz), client want FCC ID for their product, so we test it by following FCC part 15C. now it comes to filing stage, the TCB ask us to conduct a ECR for it, this is confused. for futhere information, please check the attachment. Thanks

Best Wishes

FCC response on 06/03/2026

Hello.

The ECR exception criteria in KDB 680106 is clearly defined below. For example, if the WPT device output power exceeds 15W, then an ECR submission is required. The ECR KDB shall include all the requested information as listed in KDB 680106. As such, all supporting document and information about the device shall be submitted for review.

This exception to the requirement of submitting the ECR to obtain FCC concurrence only applies when all the following criteria (1) through (6) are met:

(1) The power transfer frequency is below 1 MHz.
(2) The output power from each transmitting element (e.g., coil) is less than or equal to 15 watts.
(3) A client device providing the maximum permitted load is placed in physical contact with the transmitter (i.e., the surfaces of the transmitter and client device enclosures need to be in physical contact)
(4) Only § 2.1091-Mobile exposure conditions apply (i.e., this provision does not cover § 2.1093-Portable exposure conditions).
(5) The E-field and H-field strengths, at and beyond 20 cm surrounding the device surface, are demonstrated to be less than 50% of the applicable MPE limit, per KDB 447498, Table 1. These measurements shall be taken along the principal axes of the device, with one axis oriented along the direction of the estimated maximum field strength, and for three points per axis or until a 1/d (inverse distance from the emitter structure) field strength decay is observed. Symmetry considerations may be used for test reduction purposes. The device shall be operated in documented worst-case compliance scenarios (i.e., the ones that lead to the maximum field components), and while all the radiating structures (e.g., coils or antennas) that by design can simultaneously transmit are energized at their nominal maximum power.
(6) For systems with more than one radiating structure, the conditions specified in (5) must be met when the system is fully loaded (i.e., clients absorbing maximum power available), and with all the radiating structures operating at maximum power at the same time, as per design conditions. If the design allows one or more radiating structures to be powered at a higher level while other radiating structures are not powered, then those cases must be tested as well. For instance, a device may use three RF coils powered at 5 W, or one coil powered at 15 W: in this case, both scenarios shall be tested.

---Reply from Customer on 06/08/2026---

Dear Madam/Sir

Thanks for your prompt response to our inquiry. Butwe are still confused. hope you can give more deeper guidance, thanks.

FCC response on 06/16/2026

Hello.

Are you asking if Part 15C certification of a >15W WPT device requires an ECR? If you are asking this, then you are correct, a Part 15C WPT certification does not require an ECR as a precondition to authorization as noted in the April 2024 TCBC presentation.

Thank you.

-OET Lab staff

Attachment Details:
[WPT ECR for 15C and power greater than 15W](#)
[Response - 20260607](#)

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