

RF EXPOSURE EVALUATION REPORT

Application No.: GZCR2603000625AT
Applicant: Positive LLC
Address of Applicant: 2820 S Alma School Rd Suite 18 PMB 2011, Chandler, Arizona 85286, United States
Manufacturer: Jia Ge Digital Technology Co. Ltd
Address of Manufacturer: 11F, No. 176, Changchun Rd., Zhongshan Dist., Taipei City 104082, Taiwan
Product Name: Wireless Foot Controller
Model No.: Spark PEDAL
Trade Mark: Positive Grid
Standard(s) : KDB 447498 D01 V06
 47 CFR Part 1.1310
Date of Receipt: 2026-04-03
Date of Evaluation: 2026-05-14
Date of Issue: 2026-06-12

Evaluation Result:	Pass*
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* In the configuration evaluated, the EUT complied with the standards specified above.



Revision Record			
Version	Report No.	Date	Remark
01	GZCR260300062505	2026-06-12	Original

Authorized for issue by:			
		Luke Lin	
		Luke Lin/Project Engineer	
Approved By		Vico Cui	
		Vico Cui/Reviewer	



2 Evaluation Summary

Item	Standard	Method	Requirement	Result
RF Exposure	KDB 447498 D01 V06	KDB 447498 D01 V06	47 CFR Part 1.1310	Pass

Note:

E.U.T./EUT means Equipment Under Test.

Pass means the test result passed the test standard requirement, please find the detailed decision rule in the report relative section.

Remark:

For model Spark PEDAL optional USB port isolator IC **ISOUSB111** or **AduM3160**. And all RF modules selected for use are the same. So only the EUT with optional IC **ISOUSB111** was evaluated in this report.



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3 Contents

	Page
1 Cover Page	1
2 Evaluation Summary.....	3
3 Contents.....	4
4 General Information	5
4.1 Details of E.U.T.	5
4.2 Evaluating Location	5
4.3 Facility	6
4.4 Deviation from Standards.....	6
4.5 Abnormalities from Standard Conditions	6
5 Technical Requirements Specification	7
5.1 General Description of Applied Standards	7
5.2 RF Exposure Evaluation.....	7
5.2.1 Limit & Test Method	7
5.2.2 Conclusion	8
6 EUT Constructional Details (EUT Photos)	9



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4 General Information

4.1 Details of E.U.T.

Power supply: Powered by built in rechargeable battery as below:
 Model: GSP872693
 Rated: DC 3.7V, 3000mAh
 DC 5V 2A for charging

Cable(s): AUX-IN output *1pcs
 Audio OUTPUT port L & R *1pcs
 EXP port *1pcs
 USB-C port *1pcs (charge and transmit data)
 MIDI IN/OUT port
 Earphone port
 Refer to test report GZCR260300062502 for BLE detail.

RF characters: Refer to test report GZCR260300062503 for BT classic detail.
 Refer to test report GZCR260300062504 for 2.4GHz Wi-Fi detail.

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

4.2 Evaluating Location

All tests were performed at:
 SGS-CSTC Standards Technical Services Co., Ltd., Guangzhou Branch EMC Laboratory,
 No.198, Kezhu Road, Science City, Economic & Technological Development Area, Guangzhou,
 Guangdong, China 510663
 Tel: +86 20 82155555
 No tests were sub-contracted.



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4.3 Facility

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

- **ACMA**

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory can also perform testing for the Australian/New Zealand Regulatory Compliance Mark (RCM).

- **SGS UK(Certificate No.: 32), SGS-TUV SAARLAND and SGS-FIMKO**

Have approved SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory as a supplier of EMC TESTING SERVICES and SAFETY TESTING SERVICES.

- **FCC Recognized Accredited Test Firm(Registration No.: 486818)**

SGS-CSTC Standards Technical Services Co., Ltd., EMC Laboratory has been accredited and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Designation Number: CN5016, Test Firm Registration Number: 486818.

- **ISED (Registration No.: 4620B, CAB identifier: CN0052)**

SGS-CSTC Standards Technical Services Co., Ltd., has been registered by Innovation Science and Economic Development Canada for Wireless Device Testing laboratories to test to Canadian radio equipment requirements. Registration No. 4620B, CAB identifier: CN0052.

- **VCCI (Registration No.: R-12460, C-12584, G-20107 and T-11179)**

The 10m Semi-anechoic chamber, 966 Anechoic Chamber and Shielded Room of SGS-CSTC Standards Technical Services Co., Ltd. have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: R-12460, C-12584, G-20107 and T-11179 respectively.

- **CBTL (Lab Code: TL129)**

SGS-CSTC Standards Technical Services Co., Ltd., E&E Laboratory has been assessed and fully comply with the requirements of ISO/IEC 17025:2017, the Basic Rules, IECEE 01 and Rules of procedure IECEE 02, and the relevant IECEE CB-Scheme Operational documents.

4.4 Deviation from Standards

None

4.5 Abnormalities from Standard Conditions

None



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5 Technical Requirements Specification

5.1 General Description of Applied Standards

KDB447498D01 General RF Exposure Guidance v06

4.3.1. Standalone SAR test exclusion considerations

Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Exclusion Threshold condition, listed below, is satisfied.

5.2 RF Exposure Evaluation

5.2.1 Limit & Test Method

According to FCC Part1.1310: 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 part1.1307(b)

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled 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
300–1500			f/300	6
1500–100,000			5	6
(B) Limits for General Population/Uncontrolled Exposure				
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
300–1500			f/1500	30
1500–100,000			1.0	30

F= Frequency in MHz

Friis Formula

Friis transmission formula: $P_d = (P_{out} * G) / (4 * P_i * R^2)$

Where

P_d = power density in mW/cm²

P_{out} = output power to antenna in mW

G = gain of antenna in linear scale

P_i = 3.1416

R = distance between observation point and center of the radiator in cm

P_d is the limit of MPE, 1 mW/cm². If we know the maximum gain of the antenna and the total power input to the antenna, through the calculation, we will know the distance r where the MPE limit is reached.



5.2.2 Conclusion

Normal use condition for Distance between antenna and body: 20cm declared by applicant

For Bluetooth BLE

Antenna Gain: 2.63 dBi

Frequency (MHz)	Antenna Gain (Numeric)	Peak Output Power (dBm)	Peak Output Power (mW)	Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
2402	1.832314422	-0.83	0.83	0.00030	1.000	Complies
2440	1.832314422	0.11	1.03	0.00037	1.000	Complies
2480	1.832314422	0.54	1.13	0.00041	1.000	Complies

For Bluetooth Classic

Antenna Gain: 3.74 dBi

Frequency (MHz)	Antenna Gain (Numeric)	Peak Output Power (dBm)	Peak Output Power (mW)	Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
2402	2.365919697	0.3	1.07	0.00050	1.000	Complies
2441	2.365919697	1.22	1.32	0.00062	1.000	Complies
2480	2.365919697	1.7	1.48	0.00070	1.000	Complies

For 2.4 GHz Wi-Fi

Antenna Gain: 2.63 dBi

Frequency (MHz)	Antenna Gain (Numeric)	Peak Output Power (dBm)	Peak Output Power (mW)	Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
11B						
2412	1.832314422	11.52	14.19	0.00517	1.000	Complies
2442	1.832314422	8.08	6.43	0.00234	1.000	Complies
2462	1.832314422	7.79	6.01	0.00219	1.000	Complies
11N20						
2412	1.832314422	15.04	31.92	0.01163	1.000	Complies
2442	1.832314422	11.59	14.42	0.00526	1.000	Complies
2462	1.832314422	11.3	13.49	0.00492	1.000	Complies
11N40						
2422	1.832314422	13.33	21.53	0.00785	1.000	Complies
2442	1.832314422	11.24	13.30	0.00485	1.000	Complies
2452	1.832314422	10.78	11.97	0.00436	1.000	Complies

The Bluetooth and Wi-Fi can be transmitted together, the result is

0.00041 /1+

0.00070 /1+

0.01163 /1=

0.01274 <1

So further test is not required.

Note: Refer to report No. GZCR260300062502, GZCR260300062503, GZCR260300062504 for EUT test Max Conducted Peak Output Power value.

6 EUT Constructional Details (EUT Photos)

Refer to Appendix - External and Internal Photos for GZCR2603000625AT

- End of the Report -

