

RF Exposure Report

Application No.: SZCR2511004844AT
Applicant: DS Services of America, Inc. dba Primo Water North America
Address of Applicant: 1150 Assembly Drive, Suite 800, Tampa, FL 33607.
Manufacturer: DS Services of America, Inc. dba Primo Water North America
Address of Manufacturer: 1150 Assembly Drive, Suite 800, Tampa, FL 33607.
Factory: DS Services of America, Inc. dba Primo Water North America
Address of Factory: 1150 Assembly Drive, Suite 800, Tampa, FL 33607.
Equipment Under Test (EUT):
EUT Name: Water Filtration with Touch Controls
Model No.: JL-SPR2, JL1666S-C, STFP2KHK1RU, STFP2KHK1LR ♣
 ♣ Please refer to section 2 of this report which indicates which model was actually tested and which were electrically identical.
Trade Mark: PRIMO
FCC ID: 2A9TV-JLSPR2
Standard(s) : FCC Rules 47 CFR §2.1091
 KDB 447498 D04 interim General RF Exposure Guidance v01
Date of Receipt: 2025-11-06
Date of Test: 2025-11-11 to 2025-12-12
Date of Issue: 2025-12-14

Test Result:	Pass*
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* In the configuration tested, the EUT complied with the standards specified above.

Keny Xu

Keny Xu
EMC Laboratory Manager



SGS-CSTC Standards Technical Services Co., Ltd.
Shenzhen Branch EMC Laboratory

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SZEMC-TRF-01 Rev. A/2

Report No.: SZCR251100484404

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Revision Record				
Version	Chapter	Date	Modifier	Remark
01		2025-12-14		Original

Authorized for issue by:				
		Edison Li		
		Edison Li/Project Engineer		
		Eric Fu		
		Eric Fu/Reviewer		



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2 General Information

2.1 General Description of E.U.T.

Product Type:	☐ Portable device
	☐ Mobile device
	☒ Fixed device

2.2 Details of E.U.T.

Power supply:	AC 120V, 60Hz
Cable(s):	AC cable:140cm unshielded
For BLE	
Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	V5.0
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Data rate:	1Mbps, 2Mbps
Antenna Type:	PCB Antenna
Antenna Gain:	4.54dBi

For 2.4G WiFi	
Operation Frequency:	802.11b/g/n(HT20): 2412MHz to 2462MHz 802.11n(HT40): 2422MHz to 2452MHz
Modulation Type:	802.11b: DSSS(CCK, DQPSK, DBPSK) 802.11g: OFDM(64QAM, 16QAM, QPSK, BPSK) 802.11n(HT20 and HT40): OFDM (BPSK, QPSK, 16QAM, 64QAM)
Channel Numbers:	802.11b/g, 802.11n HT20: 11 Channels 802.11n HT40: 7 Channels
Channel Spacing:	5MHz
Antenna Type:	PCB Antenna
Antenna Gain:	4.54dBi



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For CatM1 Band	
LTE Operation Frequency Band:	CatM1 Band 2/4/5/12/13/25/26/66/85
Modulation Type:	QPSK, 16QAM
Antenna Type:	PIFA Antenna
Antenna Gain:	CatM1 Band 2: 4.61dBi, CatM1 Band 4: 4.61dBi, CatM1 Band 5: 2.43dBi, CatM1 Band 12: 2.43dBi, CatM1 Band 13: 2.43dBi, CatM1 Band 25: 4.61dBi, CatM1 Band 26: 2.43dBi, CatM1 Band 66: 2.43dBi, CatM1 Band 85: 2.43dBi.
RF Cable:	9kHz ~ 30MHz(0.3dB); 30MHz ~ 1000MHz(0.6dB) 1000MHz ~ 2000MHz(0.8dB); 2000MHz ~ 4000MHz(1.1dB) 4000MHz ~ 6000MHz(1.8dB); 6000MHz ~ 12750MHz(2.6dB)

Declaration of EUT Family Grouping:

Model No.: JL-SPR2, JL1666S-C, STFP2KHK1RU, STFP2KHK1LR

The models JL1666S-C, STFP2KHK1RU, STFP2KHK1LR were tested. According to the declaration from the applicant, the electrical circuit design, layout, components used, internal wiring and functions were identical for the above models, with only difference on model No., and appearance.

2.3 Separation Distance

Minimum test separation distance:	20cm
Remark: This minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander.	



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2.4 Test Location

All tests were performed at:

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No tests were sub-contracted.

2.5 Test Facility

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

• A2LA (Certificate No. 3816.01)

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory is accredited by the American Association for Laboratory Accreditation(A2LA). Certificate No. 3816.01.

• VCCI (Member No. 1937)

The 3m Fully-anechoic chamber for above 1GHz, 10m Semi-anechoic chamber for below 1GHz, Shielded Room for Mains Port Conducted Interference Measurement and Telecommunication Port Conducted Interference Measurement of SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen EMC laboratory have been registered in accordance with the Regulations for Voluntary Control Measures with Registration No.: G-20026, R-14188, C-12383 and T-11153 respectively.

• FCC –Designation Number: CN1336

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized as an accredited testing laboratory.

Designation Number: CN1336. Test Firm Registration Number: 787754.

• Innovation, Science and Economic Development Canada

SGS-CSTC Standards Technical Services Co., Ltd., Shenzhen EMC Laboratory has been recognized by ISED as an accredited testing laboratory.

CAB identifier: CN0006.

IC#: 4620C.



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3 FCC Radiofrequency radiation exposure limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

3.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

3.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency			Minimum Distance			Threshold ERP
f_L MHz		f_H MHz	$\lambda_L / 2\pi$		$\lambda_H / 2\pi$	W
0.3	—	1.34	159 m	—	35.6 m	1,920 R ²
1.34	—	30	35.6 m	—	1.6 m	3,450 R ² /f ²
30	—	300	1.6 m	—	159 mm	3.83 R ²
300	—	1,500	159 mm	—	31.8 mm	0.0128 R ² f
1,500	—	100,000	31.8 mm	—	0.5 mm	19.2R ²

Subscripts L and H are low and high; λ is wavelength.
From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The thresholds are

based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary if the ERP of the device is greater than ERP_{20cm} in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

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

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

Limit calculation			
Frequency range	Frequency(MHz)	$R(\lambda/2\pi)$ (m)	Threshold ERP(W)
300~1500MHz	915	0.0522	0.032
1500~100000MHz	2480	0.0193	0.007

3.3 SAR-based Exemption

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.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

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.



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The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

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).

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

where

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

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

Example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

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

Limit calculation				
Frequency range(GHz)	Frequency(GHz)	X	Distance(cm)	Pth (mW)
0.3~1.5	0.915	1.474	0.5	8.133
1.5~6	2.44	1.901	0.5	2.753

4 Measurement and Calculation

4.1 Maximum transmit power

For BLE:

Antenna Gain: 4.54dBi

Output Power Into Antenna & RF Exposure Evaluation Distance:

Frequency (MHz)	Maximum Conducted Power/EIRP [dBm]	Maximum Conducted Power/EIRP (mW)
2480	7.94	6.22

Note: Refer to report No. SZCR251100484402 for EUT test Max Power Value.

The distance r (4th column) calculated from the Fries transmission formula is far greater than 20 cm separation requirement.

For 2.4G WIFI:

Antenna Gain: 4.54dBi

Output Power Into Antenna & RF Exposure Evaluation Distance:

Frequency (MHz)	Maximum Conducted Power/EIRP [dBm]	Maximum Conducted Power/EIRP (mW)
2462	20.60	114.82

Note: Refer to report No. SZCR251100484403 for EUT test Max Power Value.

The distance r (4th column) calculated from the Fries transmission formula is far greater than 20 cm separation requirement.



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For CatM1 Band: Standalone transmission

Type	Test Freq. (MHz)	Max Antenna Gain (dBi)	Max Cond. power (dBm)	Max Cond. power (mW)	Max EIRP (dBm)	Max EIRP (mW)	Limit (mw)	Cond. Ratio	EIRP Ratio	Result
CatM1 B2	1850.7	4.61	25.00	316.23	29.61	914.11	3060.00	0.10334	0.29873	PASS
CatM1 B4	1710.7	4.61	25.00	316.23	29.61	914.11	3060.00	0.10334	0.29873	PASS
CatM1 B5	824.7	2.43	25.00	316.23	27.43	553.35	1682.39	0.18796	0.32891	PASS
CatM1 B12	699.7	2.43	25.00	316.23	27.43	553.35	1427.39	0.22154	0.38767	PASS
CatM1 B13	779.5	2.43	25.00	316.23	27.43	553.35	1590.18	0.19886	0.34798	PASS
CatM1 B25	1850.7	4.61	25.00	316.23	29.61	914.11	3060.00	0.10334	0.29873	PASS
CatM1 B26	824.7	2.43	25.00	316.23	27.43	553.35	1682.39	0.18796	0.32891	PASS
CatM1 B66	1710.7	4.61	25.00	316.23	29.61	914.11	3060.00	0.10334	0.29873	PASS
CatM1 B85	700.5	2.43	25.00	316.23	27.43	553.35	1429.02	0.22129	0.38722	PASS

Note Use the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.



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4.2 RF Exposure Calculation

Remark: we used the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

For BLE:

The Max. EIRP Power is 6.22mW, the best case gain of the Antenna: 4.54dBi

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	1mW	N/A
☐	MPE-based Exemption(ERP)	7mW(ERP)	N/A
☒	SAR-based Exemption(<i>P</i> _{th})	3060	Yes

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report.

For 2.4G WIFI:

The Max. EIRP Power is 114.82mW, the best case gain of the Antenna: 4.54dBi

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	1mW	N/A
☐	MPE-based Exemption(ERP)	7mW(ERP)	N/A
☒	SAR-based Exemption(<i>P</i> _{th})	3060	Yes

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report.

For CatM1 Band:

The Max. EIRP Power is 914.11 mW, the best case gain of the Antenna: 4.61dBi.

	Evaluation method	Exempt Limit(mW)	Verdict
☐	Blanket 1 mW Blanket Exemption	1mW	N/A
☐	MPE-based Exemption(ERP)	7mW(ERP)	N/A
☒	SAR-based Exemption(<i>P</i> _{th})	1427.39	Yes

So, the device is to qualify for SAR test exemption, the exemption report is in lieu of the SAR report.



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SGS-CSTC Standards Technical Services Co., Ltd. Shenzhen Branch

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Simultaneous transmission

Test Mode	CatM1 Band	BLE 2.4G WiFi	Total Ratio	Limit	Result
Ratio	0.38767	0.03752	N/A	N/A	N/A
Scenario 1	☒	☒	0.42519	1.0	Pass

--End of the Report--



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