



RF Exposure Evaluation Declaration

FCC ID: 2AEDR-SPLUSCP-1
Applicant: Accuride International Inc.
Product: Senseon Plus Wireless Card Programmer
Model No.: SPLUSCP-1
Brand Name: Senseon
FCC Rule Part(s): FCC Part 2.1091
Result: Complies
Test Date 2022-05-13

Reviewed By:

Jame Yuan

Jame Yuan

Approved By:

Robin Wu

Robin Wu



The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

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Revision History

Report No.	Version	Description	Issue Date	Note
2203RSU011-U2	Rev. 01	Initial Report	2022-07-07	Valid

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1. General Information

1.1. Applicant

Accuride International Inc.

12311 Shoemaker Ave, Santa Fe Springs, CA 90760

1.2. Manufacturer

Accuride International Inc.

citcuito norte 6, parque industrial nelson, 21395 mexicali, bc mexico

1.3. Testing Facility

☒	Test Site – MRT Suzhou Laboratory
	Laboratory Location (Suzhou - Wuzhong) D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China
	Laboratory Location (Suzhou - SIP) 4b Building, Liando U Valley, No.200 Xingpu Rd., Shengpu Town, Suzhou Industrial Park, China
	Laboratory Accreditations
	A2LA: 3628.01 FCC: CN1166 VCCI: ☐ R-20025 ☐ G-20034 ☐ C-20020 ☐ T-20020 ☐ R-20141 ☐ G-20134 ☐ C-20103 ☐ T-20104
	CNAS: L10551 ISED: CN0001
☐	Test Site – MRT Shenzhen Laboratory
	Laboratory Location (Shenzhen) 1G, Building A, Junxiangda Building, Zhongshanyuan Road West, Nanshan District, Shenzhen, China
	Laboratory Accreditations
	A2LA: 3628.02 FCC: CN1284
	CNAS: L10551 ISED: CN0105
☐	Test Site – MRT Taiwan Laboratory
	Laboratory Location (Taiwan) No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.)
	Laboratory Accreditations
	TAF: L3261-190725 FCC: 291082, TW3261
	ISED: TW3261

1.4. Product Information

Product Name	Senseon Plus Wireless Card Programmer
Model No.	SPLUSCP-1
Brand Name	Senseon
EUT Identification No.	20220304Sample#07
Integrated modular Information	Product Type: Wi-Fi & Bluetooth Internet of Things Module Model No.: ESP32-WROOM-32E Radio Specification:802.11b/g/n (Support Wi-Fi only)
SRD Specification	13.56MHz
Power Supply	5 Vdc
Remark: 1. The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer. 2. The minimum distance between the radiating structure of a device and the general public is 50cm, declared by the manufacturer.	

1.5. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 2.1091 & KDB 447498 D04 Interim General RF Exposure Guidance v01

2. Measurement instrument

Instrument	Manufacturer	Model No.	Asset No.	Cali. Interval	Cali. Due Date	Test Site
Broadband EM Field Meter	ar	SM40G	MRTSUE06358	3 years	2024-05-05	WZ-SR4
E-field sensor head	ar	SHE100K6z5G	MRTSUE06444	3 years	2024-05-05	WZ-SR4
Thermohygrometer	testo	608-H1	MRTSUE06222	1 year	2022-10-10	WZ-SR4

3. RF Exposure Evaluation

2.1. Test Limits

According to FCC §1.1310: 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 §1.1307(b)

Limits For Maximum Permissible Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Average Time (Minutes)
(A) Limits for Occupational/ Control 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
300-1,500	--	--	f/300	<6
1,500-100,000	--	--	5	<6
(B) Limits for General Population/ Uncontrolled Exposures				
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
300-1,500	--	--	f/1500	<30
1,500-100,000	--	--	1.0	<30

f= frequency in MHz. * = Plane-wave equivalent power density.

2.1. MPE Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(ii)(A) of this section.

Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

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

Where

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

and

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

d = the separation distance (cm);

(Option C) Or using Table 1 and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP 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 (1.64 linear value).

Table 1 to §1.1307(b)(3)(i)(C) - Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	$1920R^2$
1.34-30	$3450R^2/f^2$
30-300	$3.83R^2$
300-1,500	$0.0128R^2/f$
1,500-100,000	$19.2R^2$

For multiple RF sources: Multiple RF sources are exempt if:

(A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(B) in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure Limit_k} \leq 1$$

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum

distance including existing evaluated transmitters.

P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

$P_{th,i}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i .

ERP_j = the ERP of fixed, mobile, or portable RF source j .

$ERP_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source j , at a distance of at least $\lambda/2\pi$ according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

Evaluated_k = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

Exposure Limit_k = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k , as applicable from §1.1310 of this chapter.

2.2. Calculated Result

Product	Senseon Plus Wireless Card Programmer
Test Item	RF Exposure Evaluation

Technical Specification	Frequency Band (MHz)	Max. Conducted Power (dBm)	Max. Tune-up Conducted Power (dBm)	Max. Antenna Gain (dBi)	Max. ERP		Threshold ERP (mW) @ 50cm
					dBm	mW	
Wi-Fi	2412 ~ 2462	26.0	26.0	3.4	27.25	530.88	4800

Note:

- Max EIRP = Max Turn-up conducted power (dBm) + Max. Antenna Gain (dBi).
Max ERP = Max EIRP - 2.15dB.
Threshold ERP = 19R²
- The maximum EIRP power of the device was calculated according to the maximum permissible power from the module's reports (2AC7Z-ESP32WROOM32E) provided by the manufacturer.
- R is declared by the manufacturer.

Technical Specification	Frequency Band (MHz)	Electric Field (V/m) @ 50cm	Electric Field Limit (V/m)
NFC	13.56	0.72	60.77

For multiple RF sources

NFC, and WLAN 2.4GHz can transmit simultaneously.

Exposure ratio = $530.88 / 4800 + 0.72 / 60.77 = 0.1224 < 1$

Therefore, the device qualifies for RF exposure test exemption.

Appendix A - Test Setup Photograph

Refer to “2203RSU011-UT” file.

Appendix B - EUT Photograph

Refer to “2203RSU011-UE” file.