RF Exposure Evaluation Report

1. Product Information

FCC ID:	2AGR4-100937
Number of tested samples	1
Sample number	210312020A
Product Name	Truman Dual Wireless Charger and Headphone Stand
Model Number	100937-001, 100937-121
Power Supply	Input: DC 9V/3.0A Wireless Output: 10W(max)*2
Modulation Type	CW (Continuous Wave)
Frequency Range	110.7 KHz - 148 KHz
Operation Frequency	146 KHz
Antenna Type	Coil Antenna
Hardware version	FC-HB23-V10
Software version	/
Accessories	Mobile Phone(MI9, iPhoneX)
Exposure category	General population/uncontrolled environment
EUT Type	Production Unit
Device Type	Mobile Device

2. Evaluation Method

Per KDB 680106 D01 Section 3. RF Exposure Requirements;

1) Consumer wireless power transfer devices approved under Part 15 and Part 18 in some cases have to demonstrate compliance with RF exposure requirements. The potential for exposure must be assessed according to the operating configurations of the wireless system and the exposure conditions of users and bystanders. RF exposure must be evaluated with the client device(s) being charged by the primary at maximum output power. The RF exposure requirements must be determined in conjunction with the device operating characteristics, according to the mobile and portable exposure requirements in Section 2.1091 and Section 2.1093 of the rules. SAR and MPE limits do not cover the frequency range for wireless power transfer applications which operate below 100 kHz and 300 kHz respectively; therefore, RF exposure compliance needs to be determined with respect to 1.1307 (c) and (d) of the FCC rules.
2) Based on the design and implementation of the power transfer application, it must be clearly identified if mobile or portable RF exposure conditions apply. Devices that are installed to provide separation of at least 20 cm from users and bystanders may qualify for mobile exposure conditions. For some conditions where users and bystanders may be exposed at closer than 20 cm, section 2.1091(d) (4) of the rules may apply.
3) For devices designed for typical desktop applications, such a wireless charging pads, RF exposure evaluation should be conducted assuming a user separation distance of 15 cm. E and H field strength measurements or numerical modeling may be used to demonstrate compliance. Measurements should be made from all sides and the top of the primary/client pair, with the 15 cm measured from the center of the probe(s) to the edge of the device. Emissions between 100 kHz to 300 kHz should be assessed versus the limits at 300 kHz in Table 1 of Section 1.1310: 614 V/m and 1.63 A/m. A KDB inquiry is required to determine the applicable exposure limits below 100 kHz.

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4) Portable exposure conditions from 100 kHz to 6 GHz are determined with respect to SAR requirements. Existing SAR systems and test procedures are generally intended for measurements above 100 MHz. While numerical modeling can be an alternative, the constraints of substantial computational resources at low frequencies could introduce further limitations. Under these circumstances, including operations below 100 kHz, the Commission may consider a combination of analytical analysis, field strength, radiated and conducted power measurements, in conjunction with some limited numerical modeling to assess compliance.
5) Depending on the operating frequency, existing SAR and MPE measurement procedures may be adapted to evaluate wireless power transfer devices for compliance with respect to mobile or portable exposure conditions. If the grantee or its test lab have any questions regarding RF exposure evaluation they should contact the FCC Laboratory with sufficient system operating configuration details to determine if RF exposure evaluation is necessary and, if required, how to apply specific test procedures. Below 100 MHz, when SAR testing is required and the device is operating at close proximity to persons, information on device design, implementation, operating configurations, exposure conditions of users and bystanders are needed to determine the evaluation and testing requirements. In addition, the influence of nearby objects may also need consideration according to the wireless power transfer system implementation; for example, the effects of placing the device, its coils or radiating elements on or near metallic surfaces

3. Evaluation Limit

3.1 Refer evaluation method

ANSI C95.1–1999: IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

FCC KDB publication 680106 D01 RF Exposure Wireless Charging Apps v03: RF Exposure Considerations for Low Power Consumer Wireless Power Transfer Applications

FCC CFR 47 part1 1.1310: Radiofrequency radiation exposure limits.

FCC CFR 47 part2 2.1091: Radiofrequency radiation exposure evaluation: mobile devices

FCC CFR 47 part 18.107: Indusial, Scientific, and Medical Equipment

3.2 Limit

Limits for Maximum Permissible Exposure (MPE)/Controlled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm²)	Averaging Time (minute)
Limits for Occupational/Controlled Exposure				
0.3-3.0	614	1.63	*100	6
3.0-30	1842/f	4.89/f	*900/f²	6
30-300	61.4	0.163	1.0	6
300-1,500	/	/	f/300	6
1,500-100,000	/	/	5	6

Limits for Maximum Permissible Exposure (MPE)/Uncontrolled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm²)	Averaging Time (minute)
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
300-1,500	/	/	f/1500	30
1,500-100,000	/	/	1.0	30

F=frequency in MHz

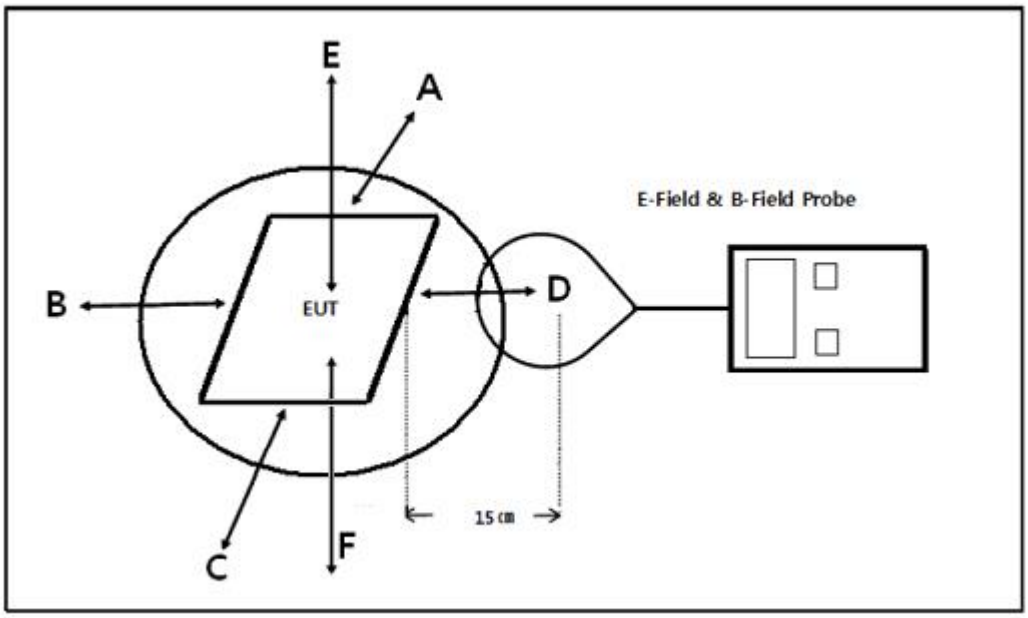
*=Plane-wave equivalent power density

According to FCC KDB 680106 D01 Section 3. RF Exposure Requirements clause 3 the Emission-Limits in the frequency range from 100 KHz to 300 KHz should be assessed versus the limits at 300 KHz in Table 1 of CFR 47 – Section1.1310 as following (measured distance shall be 15cm from the center of the probe to the edge of the device):

	E-filed	H-filed	B-filed
Frequency	V/m	A/m	uT
0.3 MHz – 3.0 MHz	614	1.613	2.0
3.0 MHz – 30 MHz	824/f (=27.5_{30MHz})	2.19/f (=0.073_{30MHz})	--

A KDB inquire was required to determine/confirm the applicable limits below 100 KHz.

4. Test Setup Diagram



Due to installation limitations no tests from the underside of the charging device (Test Position F) are required.

5. Test Equipment

Equipment	Manufacturer	Model	Serial no.	Calibrated date	Calibrated Due
Exposure Level Tester	Narda	ELT-400	N-0713	2020-06-22	2021-06-21
B-Field Probe	Narda	ELT-400	M-1154	2020-06-22	2021-06-21

6. Measurement Procedure

a) The RF exposure test was performed on 360 degree turn table in anechoic chamber.

b) The measurement probe was placed at test distance (15cm and 20cm) which is between the edge of the charger and the geometric center of probe.

c) The turn table was rotated 360d degree to search of highest strength.

d) The highest emission level was recorded and compared with limit as soon as measurement of each points (A, B, C, D, E) were completed.

e) The EUT were measured according to the dictates of KDB 680106D01v03.

7. Equipment Approval Considerations

The EUT does not fully comply with item 5.2 of KDB 680106 D01 V03 as follows table;

Requirements of KDB 680106 D01	Yes / No	Description
Power transfer frequency is less than 1 MHz	Yes	The device operate in the frequency range 110.7 KHz – 148.0 KHz
Output power from each primary coil is less than 15 watts	Yes	The maximum output power of the each primary coil is 10W.
The transfer system includes only single primary and secondary coils. This includes charging systems that may have multiple primary coils and clients that are able to detect and allow coupling only between individual pairs of coils.	No	The transfer system includes two same charging circuit part and each part include one pair of primary and secondary coils.
Client device is placed directly in contact with the transmitter.	Yes	Client device is placed directly in contact with the transmitter.
Mobile exposure conditions only (portable exposure conditions are not covered by this exclusion).	Yes	Mobile exposure conditions only
The aggregate H-field strengths at 15 cm surrounding the device and 20 cm above the top surface from all simultaneous transmitting coils are demonstrated to be less than 50% of the MPE limit.	Yes	The EUT H-field strengths at 15 cm surrounding the device and 20 cm above the top surface from all simultaneous transmitting coils are demonstrated to be less than 50% of the MPE limit.

In all other cases, unless excluded by 5. b) above, an RF exposure evaluation report must be reviewed and accepted through a KDB inquiry to enable authorization of the equipment. When evaluation is required to show compliance; for example, using field strength, power density, SAR measurements or computational modeling etc., the specific authorization requirements will be determined based on the results of the RF exposure evaluation.

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8. E and H field Strength

8.1 Symbols

For the purpose of the present document, the following symbols apply;

E: Filed strength

H: Magnetic field strength

E_{AVG} = Spatial average of Filed strength

H_{AVG} = Spatial average of Magnetic field strength

E_1: Filed Strength of wireless charge port 1 (MI9)

H_1: Magnetic field strength of wireless charge port 1 (MI9)

E_2: Filed Strength of wireless charge port 1 (iphone X)

H_2: Magnetic field strength of wireless charge port 1 (iphone X)

E_{1A}: Filed strength of wireless charge port 1 at test position A

H_{1A}: Magnetic field strength of wireless charge port 1 at test position A

8.2 Standalone E-Filed Strength and H-Filed Strength

Test Modes:		
TM1	AC/DC Adapter (9V/3A) + EUT + Mobile Phone (MI9) + Mobile Phone iphone X) (Battery Status: <1%)	Record
TM2	AC/DC Adapter (9V/3A) + EUT + Mobile Phone (MI9) + Mobile Phone iphone X) (Battery Status: <50%)	Record
TM3	AC/DC Adapter (9V/3A) + EUT + Mobile Phone (MI9) + Mobile Phone iphone X) (Battery Status: <100%)	Record

The three charge ports are same for rated power, tested at charge together and measure each five points;

Test mode: Normal Operation (Charging mode)

E-Filed Strength at 15 cm from the edges surrounding the EUT and 15 cm above the top surface

Charge Port	Charging Battery Level	Frequency Range (MHz)	Measured E-Field Strength Values (V/m)					FCC E-Field Strength 50% Limits (V/m)	FCC E-Field Strength Limits (V/m)
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
E_1	1%	0.146	5.81	5.89	5.83	5.89	5.91	307.0	614.0
	50%	0.146	5.22	5.31	5.25	5.26	5.36	307.0	614.0
	99%	0.146	4.92	4.76	4.73	4.81	4.72	307.0	614.0
E_2	1%	0.146	5.88	5.84	5.92	5.86	5.79	307.0	614.0
	50%	0.146	5.43	5.46	5.37	5.42	5.25	307.0	614.0
	99%	0.146	5.26	5.19	5.31	5.23	5.08	307.0	614.0

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H-Filed Strength at 15 cm from the edges surrounding the EUT and 15 cm above the top surface

Charge Port	Charging Battery Level	Frequency Range (MHz)	Measured H-Field Strength Values (A/m)					FCC H-Field Strength 50% Limits (A/m)	FCC H-Field Strength Limits (A/m)
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
H_1	1%	0.146	0.169	0.148	0.164	0.158	0.153	0.815	1.63
	50%	0.146	0.127	0.134	0.129	0.136	0.127	0.815	1.63
	99%	0.146	0.121	0.107	0.148	0.121	0.103	0.815	1.63
H_2	1%	0.146	0.161	0.187	0.165	0.167	0.162	0.815	1.63
	50%	0.146	0.135	0.137	0.136	0.133	0.141	0.815	1.63
	99%	0.146	0.124	0.126	0.119	0.117	0.128	0.815	1.63

H-Field Strength at 20cm from the top surface of the EUT

Charge Port	Charging Battery Level	Frequency Range (MHz)	Measured H-Field Strength Values (A/m)	FCC H-Field Strength 50% Limits (A/m)	FCC H-Field Strength Limits (A/m)
			Test Position E		
H_1	1%	0.146	0.137	0.815	1.63
	50%	0.146	0.112	0.815	1.63
	99%	0.146	0.102	0.815	1.63
H_2	1%	0.146	0.141	0.815	1.63
	50%	0.146	0.125	0.815	1.63
	99%	0.146	0.113	0.815	1.63

8.3 Simultaneous E-Filed Strength and H-Filed Strength

KDB 447498 points for simultaneous transmission on far-filed measurement, while for below 30 MHz usually measured at near-filed. KDB680106 require aggregate leakage fields at 15 cm surrounding the device from all simultaneous transmitting coils are demonstrated to be less than 50% of the MPE limit;
KDB680106 can accept using field strength, power density, SAR measurements or computational modeling etc., the specific authorization requirements will be determined based on the results of the RF exposure evaluation.
Test labs suggest use Computational modelling to calculate Nerve Stimulation BRs;
Computational modelling, such as finite-difference time-domain (FDTD) may be used to demonstrate compliance with FCC § 1.1310 limits requirement,
Basic Calculations - The following calculations may be used to evaluate systems without consideration for the effects of phase resulting from multiple frequency and/or multiple antennas co-located in the measurement space, which may overestimate the actual result. If the result exceeds the limits, the advanced calculations described in follows may be used.

$$E_{AVG} = \sum_{i=1}^{n} (E_{MaxRMS})_i$$

Where:
E-field measurements
E_{AVG} = Spatial average
E_{MaxRMS} = E-field at a measurement point

N = Number of spatially averaged points

And

$$H_{AVG} = \sum_{i=1}^{n} (H_{MaxRMS})_i$$

Where:
H-field levels of magnetic field strength
H_{AVG} = Spatial average
H_{MaxRMS} = H-field at a measurement point
N = Number of spatially averaged points

E-Filed Strength at 15 cm from the edges surrounding the EUT and 15 cm above the top surface

Spatial Average	Charging Battery Level	Frequency Range (MHz)	Measured E-Field Strength Values (V/m)					FCC E-Field Strength 50% Limits (V/m)	FCC E-Field Strength Limits (V/m)
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
E_{AVG}	1%	0.146	11.69	11.73	11.75	11.75	11.7	307.0	614.0
	50%	0.146	10.65	10.77	10.62	10.68	10.61	307.0	614.0
	99%	0.146	10.18	9.95	10.04	10.04	9.8	307.0	614.0

H-Filed Strength at 15 cm from the edges surrounding the EUT and 15 cm above the top surface

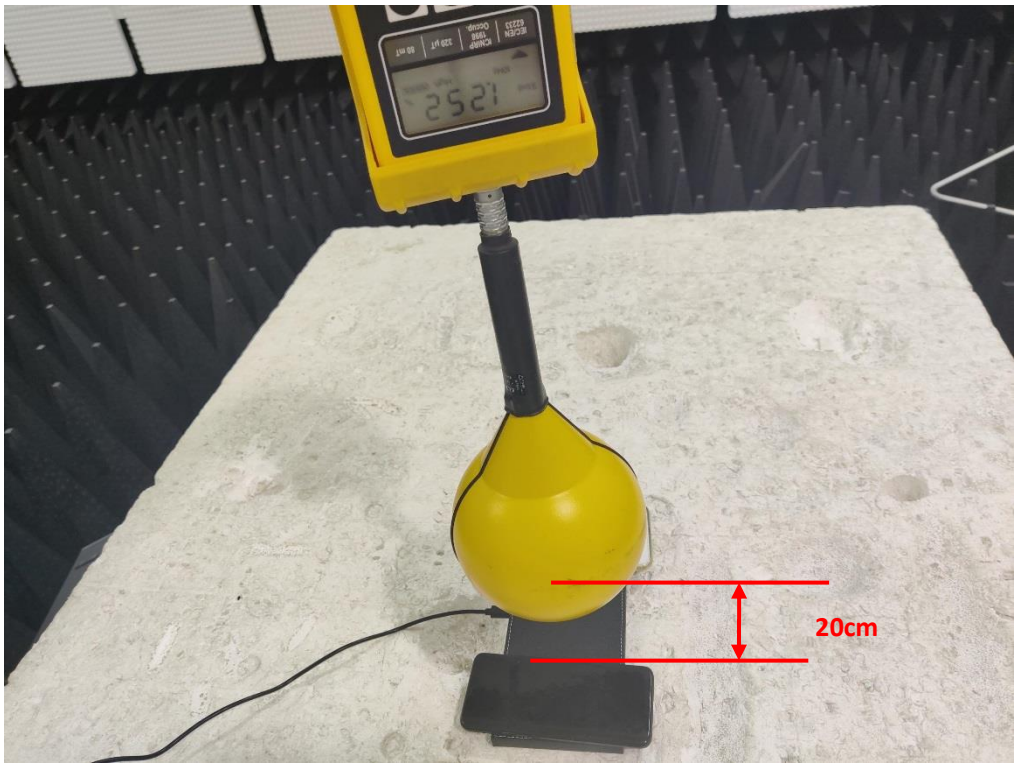
Spatial Average	Charging Battery Level	Frequency Range (MHz)	Measured H-Field Strength Values (A/m)					FCC H-Field Strength 50% Limits (A/m)	FCC H-Field Strength Limits (A/m)
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
H_{AVG}	1%	0.146	0.33	0.335	0.329	0.325	0.315	0.815	1.63
	50%	0.146	0.262	0.271	0.265	0.269	0.268	0.815	1.63
	99%	0.146	0.245	0.233	0.267	0.238	0.231	0.815	1.63

H-Field Strength at 20cm from the top surface of the EUT

Charge Port	Charging Battery Level	Frequency Range (MHz)	Measured H-Field Strength Values (A/m)	FCC H-Field Strength 50% Limits (A/m)	FCC H-Field Strength Limits (A/m)
			Test Position E		
H_{AVG}	1%	0.146	0.278	0.815	1.63
	50%	0.146	0.237	0.815	1.63
	99%	0.146	0.215	0.815	1.63

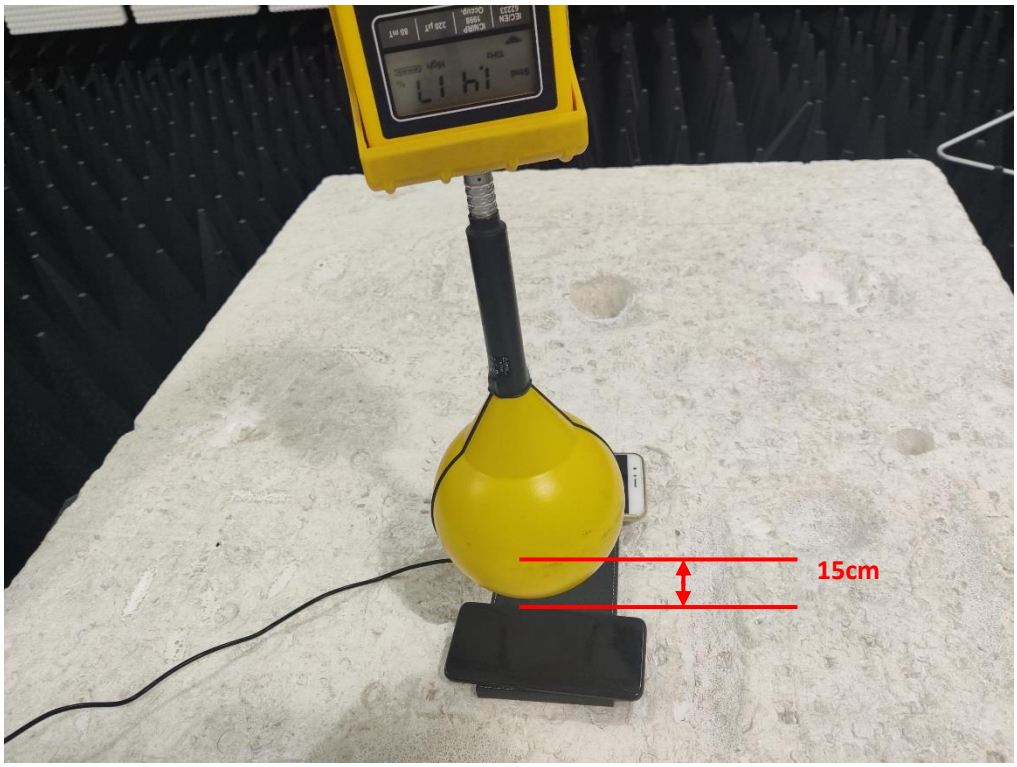
9. Test Setup Photos

9.1. Test Position E - Exposure photo from top surface (20cm)



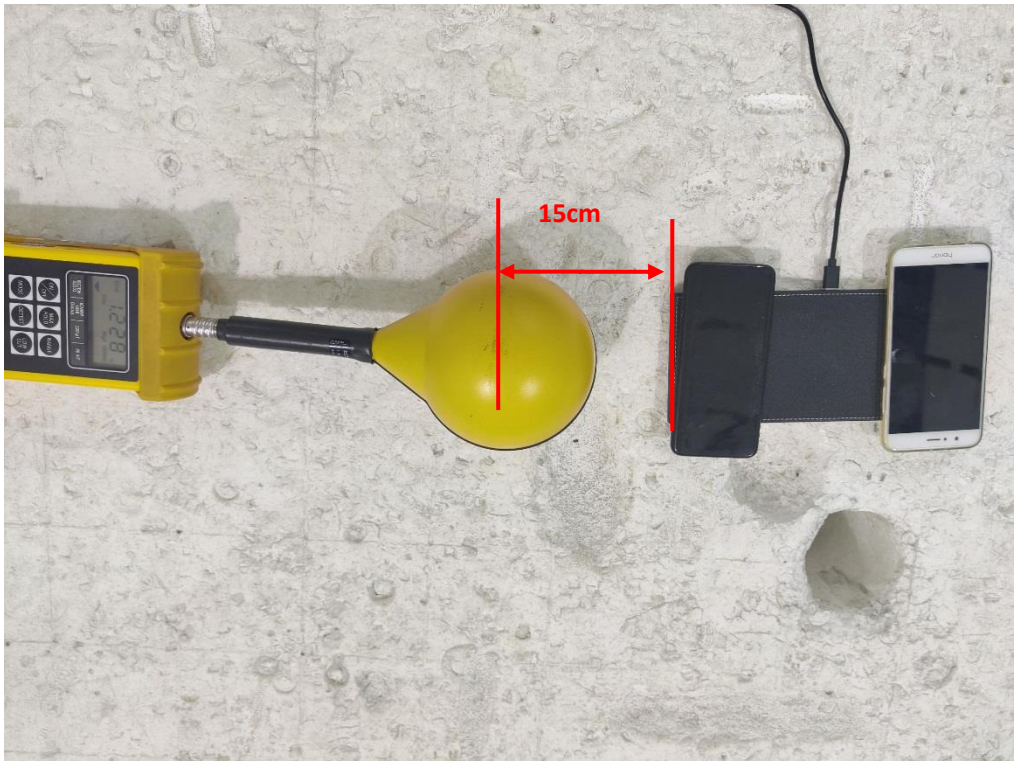
(TM1)

9.2. Test Position E - Exposure photo from top surface (15cm)



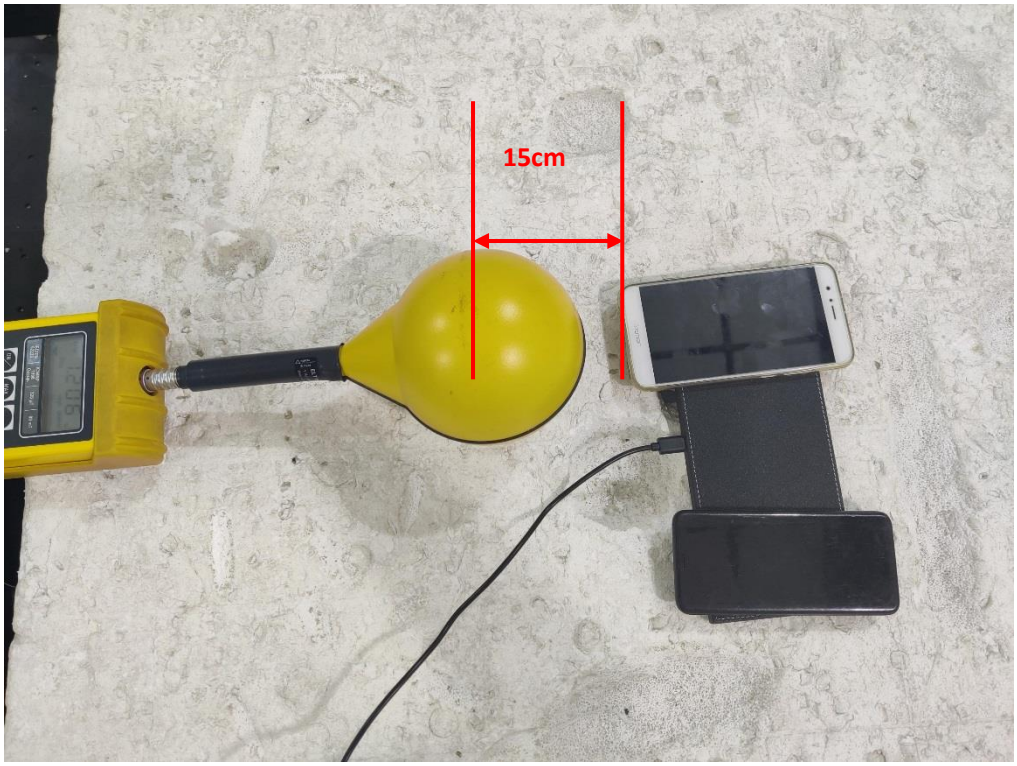
(TM1)

9.3. Test Position A - Exposure photo from side edge surface-Rear

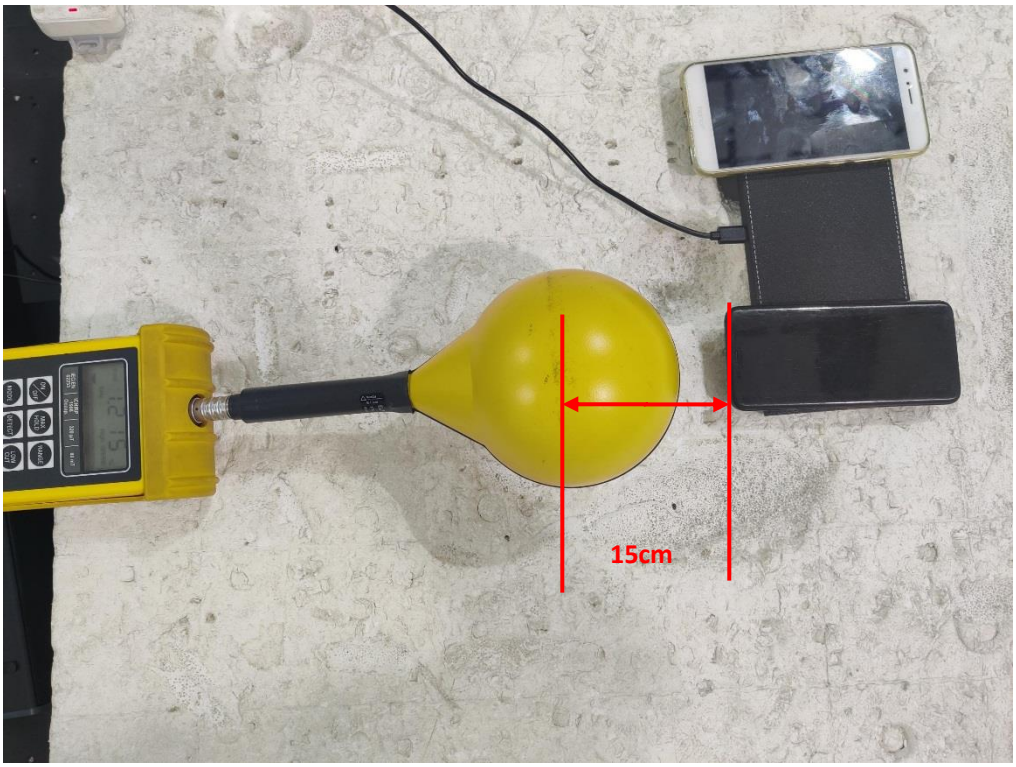


(TM1)

9.4. Test Position B - Exposure photo from side edge surface-Left

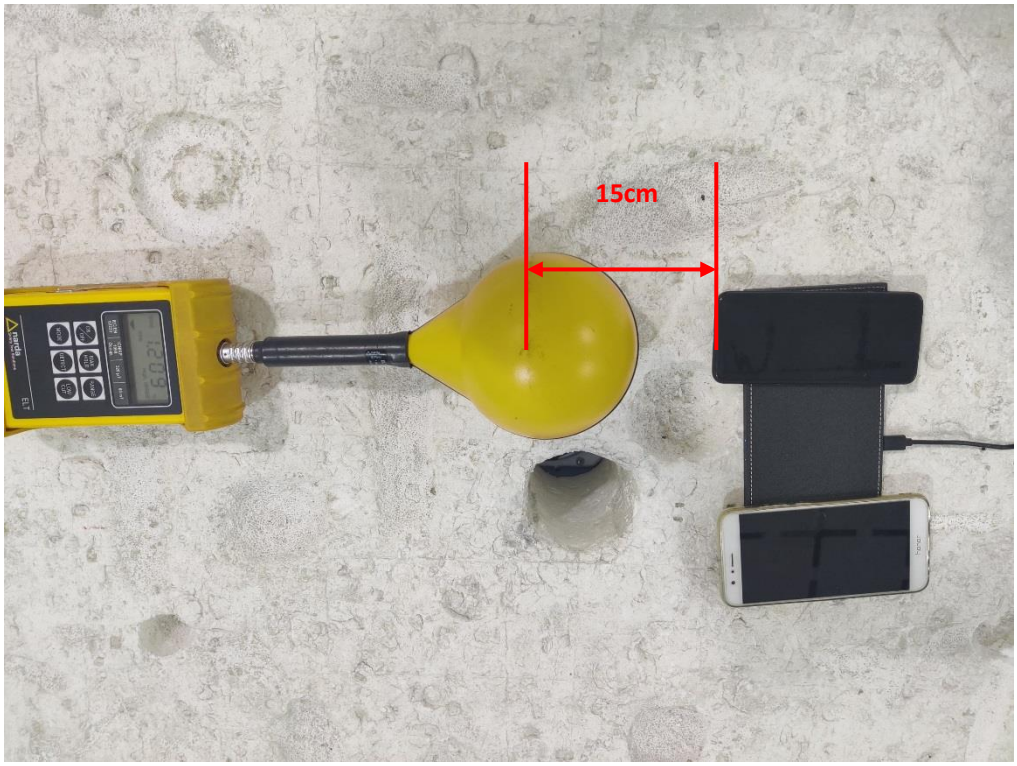


(TM1)



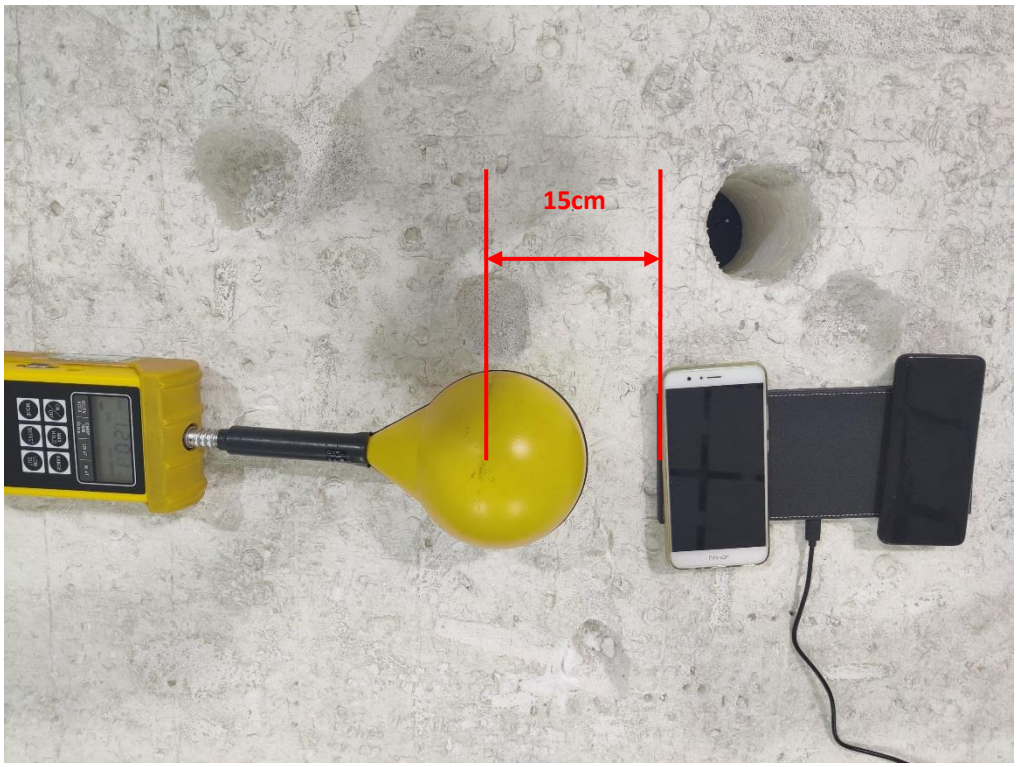
(TM1)

9.5. Test Position C - Exposure photo from side edge surface-Right



(TM1)

9.6. Test Position D - Exposure photo from side edge surface- Front



(TM1)

10. Conclusion

A minimum safety distance of at 15 cm surrounding the device and 20 cm above the top surface of the device is required when the device is charging a smart phone. The detected emissions with a distance of 15 cm surrounding the device and 20 cm above the top surface of the device are below the limitations according to FCC KDB 680106 D01 Section 3. RF Exposure Requirement Clause 3.

Revision History

Revision	Issue Date	Revisions	Revised By
000	March 26, 2021	Initial Issue	Gavin Liang

.....END OF REPORT.....