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United States

Test report no.:

260170-AU01+W04

for:

DOOR Systems, Inc
Smart lock controller
Luther

according to:

47 CFR Part 2
RSS-102
SAFETY CODE 6



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Deutsche
Akkreditierungsstelle
D-PL-12155-01-00

Accreditation:

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MRA US-EU, FCC designation number: DE0010
Test firm registration number: 997268
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Recognized until 2027-03-18 by the
Department of Innovation, Science and Economic Development Canada (ISED)
as a recognized testing laboratory
CAB identifier: DE0011
Company number: 3472A

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1 Summary of test results

1.1 FCC standard

<i>FCC standard</i>	<i>Requirement</i>	<i>Result</i>	<i>Page</i>
47 CFR Part 2, § 2.1091	Maximum permissible exposure, except WPT, calculation	Passed	10
47 CFR Part 2, § 2.1091	Simultaneous transmissions - Maximum permissible exposure, except WPT	Passed	15

1.2 IC standard

<i>IC standard</i>	<i>Requirement</i>	<i>Result</i>	<i>Page</i>
RSS-102 Issue 6, section 6.6	Evaluation for separation distance > 20 cm, except 3 kHz – 10 MHz	Passed	17
SAFETY CODE 6, section 2.2.2, note 4	Simultaneous transmissions - evaluation for separation distance > 20 cm, except 3 kHz – 10 MHz	Passed	21

Straubing, July 23, 2026



Tested by
Konrad Graßl
Department Manager Radio



Approved by
Christian Kiermeier
Reviewer

2 Test regulations

2.1 FCC standards

Standard	Title
Part 1, Subpart I, Section 1.1307 October 2025	Actions that may have a significant environmental effect, for which Environmental Assessment (EAs) must be prepared.
Part 1, Subpart I, Section 1.1310 October 2025	Radiofrequency radiation exposure limits
Part 2, Subpart J, Section 2.1091 October 2025	Radiofrequency radiation exposure evaluation: mobile devices.
KDB 447498 D04 v01 November 29, 2021	RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices
ANSI C63.10 September, 2020	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
ANSI/USEMCSC C63.10-2020/Cor 1-2023 (Corrigendum to ANSI C63.10-2020)	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Corrigendum 1
ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020)	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Amendment 1
ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020)	Errata to American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Amendment 1

Note: Where ANSI C63.10 is referred to in combination with Canadian standards (RSS), this is equivalent to

- ANSI C63.10-2020
- + ANSI/USEMCSC C63.10-2020/Cor 1-2023 (Corrigendum to ANSI C63.10-2020)
- + ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020), Amendment
- + ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020), Errata

2.2 ISED standards

Standard	Title
RSS-102 Issue 6 (December 15, 2023)	Spectrum Management and Telecommunications Radio Standards Specification Radio Frequency (RF) Exposure Compliance of Radio communication Apparatus (All Frequency Bands)
Safety Code 6 (2015)	Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz
ANSI C63.10 September, 2020	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
ANSI/USEMCSC C63.10-2020/Cor 1-2023 (Corrigendum to ANSI C63.10-2020)	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Corrigendum 1
ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020)	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Amendment 1
ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020)	Errata to American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices Amendment 1

Note: Where ANSI C63.10 is referred to in combination with Canadian standards (RSS), this is equivalent to

- ANSI C63.10-2020
- + ANSI/USEMCSC C63.10-2020/Cor 1-2023 (Corrigendum to ANSI C63.10-2020)
- + ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020), Amendment
- + ANSI/USEMCSC C63.10a-2024 (Amendment to ANSI C63.10-2020), Errata

3 Equipment under Test

All Information in this clause is declared by customer.

3.1 General information

Product type:	Smart lock controller	
Model name:	Luther	
Serial number(s):	N/A	
Applicant:	DOOR Systems, Inc.	
Manufacturer:	CODEREPUBLIK SRL	
Hardware version:	04	
Software version:	v2.5.255+b31400	
Short description:	EUT is a smart lock controller, which transmits its data via LoRa. Additionally RFID at 13.56 MHz and Bluetooth low energy are integrated.	
Additional modifications:	None	
FCC ID:	2AK5B-L3	
IC registration number:	22134-L3	
Power supply:	DC supply (battery)	
	Nominal voltage:	9.0 V
	Minimum voltage:	4.5 V
	Maximum voltage:	9.0 V

3.2 Radio specifications

3.2.1 Radio technology 1

System type:	RFID Reader		
Application frequency band:	13.110 MHz – 14.010 MHz		
Operating frequencies:	13.56 MHz		
Number of RF channels	1		
Highest internal frequency:	2480 MHz (BLE)		
Modulation	ASK		
Antenna:	Type:	PCB antenna	
	Connector:	☐ external	☐ internal
		☐ temporary	☒ none (integral antenna)

3.2.2 Radio technology 2

System type:	Digital transmission system (DTS)		
Radio technology:	Bluetooth low energy		
Application frequency band:	2400.0 MHz - 2483.5 MHz		
Number of RF channels:	40		
Nominal bandwidth:	2 MHz		
Modulation(s):	GFSK		
Antenna:	Type:	PCB antenna	
	Gain:	1.4 dBi (maximum)	
	Model:	Luther BLE/LoRa	
	Manufacturer:	WaveLink	
	Connector:	☐ external	☐ internal
		☐ temporary	☒ none (integral antenna)

3.2.3 Radio technology 3

System type:	Digital transmission system (DTS)		
Radio technology:	LoRa		
Application frequency band:	902 MHz - 928 MHz		
Nominal bandwidth:	125 kHz		
Modulation(s):	GFSK		
Antenna:	Type:	PCB antenna	
	Gain:	-1.5 dBi (maximum)	
	Model:	Luther BLE/LoRa	
	Manufacturer:	WaveLink	
	Connector:	☐ external	☐ internal
		☐ temporary	☒ none (integral antenna)

3.3 Human exposure specifications

Exposed body region during normal use:	whole body
Exposure limits applied for:	general public
Applied separation distance for permanent exposure (see note):	> 20 cm
Simultaneous transmissions:	yes

3.4 Photographs of EUT

See Annex B of test report 260170-AU01+W01 of test laboratory Element Materials Technology Straubing GmbH.

4 Test results

This clause gives details about the test results as collected in the summary of test results on page 4.

4.1 FCC

4.1.1 Maximum permissible exposure, except WPT, calculation

Requirement: Part 2, §2.1091
Reference: KDB 447498 D04 v01

Performed by:	Konrad Graßl	Date of test:	July 23, 2026
Result:	☒ Product exempt	☐ Product not exempt	

4.1.1.1 Requirements and limits maximum permissible exposure

According to §2.1091(b):

A mobile device is defined as “a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter’s radiating structure(s) and the body of the user or nearby persons.”

According to §2.1091(c)(1):

Evaluation of compliance with the exposure limits in §1.1310 of this chapter, and preparation of an EA if the limits are exceeded, is necessary for mobile devices with single RF sources having either more than an available maximum time-averaged power of 1 mW or more than the ERP listed in Table 1 to §1.1307(b)(3)(i)(C), whichever is greater. For mobile devices not exempt by §1.1307(b)(3)(i)(C) at distances from 20 centimeters to 40 centimeters and frequencies from 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 of this chapter is necessary if the ERP of the device is greater than ERP_{20cm} in the formula below. If the ERP of a single RF source at distances from 20 centimeters to 40 centimeters and frequencies from 0.3 GHz to 6 GHz is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP) in comparison with the following formula 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 (1.64 linear value).

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

According to §1.1307(b)(3)(i)(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).

RF Source frequency (MHz)	Threshold ERP (watts)
0.3-1.34	$1,920 R^2$.
1.34-30	$3,450 R^2/f^2$.
30-300	$3.83 R^2$.
300-1,500	$0.0128 R^2 f$.
1,500-100,000	$19.2 R^2$.

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

Note:

- According to the TCB Workshop on April 27, 2022 P_{th} can be calculated to the extended frequency range 100 kHz to 6 GHz. The formulas in the presentation of the TCB workshop beginning at slide 17 were used in addition to the KDB 447498 D04 v01.

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

Where

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

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

Table 2: Formula for calculation P_{th}

4.1.1.2 Process to Determine RF Exposure Compliance

According to Appendix A of KDB 447498 D04 Interim General RF Exposure Guidance V01: Generally, the sequence to apply for single portable RF sources includes the following steps:

- 1) Determination of 1 mW blanket exemption under § 1.1307(b)(3)(i)(A)
- 2) Determination of exemption under the MPE-based § 1.1307(b)(3)(i)(C) if 1) is not met
- 3) Determination of exemption under the SAR-based § 1.1307(b)(3)(i)(B) if both 1) and 2) are not met

4.1.1.3 Results

4.1.1.3.1 Radio technology 1

The following data are based on applicants document: Test report 260170-AU01+W01 of the test laboratory Element Materials Technology Straubing GmbH

Field strength: 22.4 dB μ V/m at 30 m at 13.56 MHz
Calculated EIRP: -52.8 dBm
Calculated ERP: -55.0 dBm

Information related to Exposure:

Tune-up tolerance 0 dB
(according to the manufacturer):
Separation distance: 20 cm
Body region: whole body
Exposure limits applied for: general public
Power averaging over time: not applied
Applied determination process: step 3 of clause 4.1.1.2

<i>Channel Frequency (MHz)</i>	<i>ERP + tune-up tolerance (dBm)</i>	<i>ERP (mW)</i>	<i>Limit threshold ERP (mW)</i>	<i>Ratio of limit</i>	<i>Result</i>
13.56	-55.0	0.0000032	661.1156801	4.8E-09	Passed

Table 3: Result of evaluation of compliance

EIRP is calculated using the formula of ANSI C63.10, clause 11.12.2.2:

$$\text{EIRP} = E + 20\log(d) - 104.8$$

Where: EIRP = equivalent isotropically radiated power in dBm
E = electric field strength in dB μ V/m
d = measurement distance in meters (m)

According to annex G.4 of ANSI C63.10:

$$\text{ERP} = \text{EIRP} - 2.15 \text{ dB}$$

4.1.1.3.2 Radio technology 2

The following data are based on applicants document: Test report 260170-AU01+W02 of the test laboratory Element Materials Technology Straubing GmbH

Antenna gain: 1.4 dBi
Maximum conducted output power: 2.8 dBm at 2440 MHz
Calculated EIRP: 4.2 dBm at 2440 MHz
Calculated ERP: 2.1 dBm at 2440 MHz

Information related to Exposure:

Tune-up tolerance (according to the manufacturer): 0 dB
Separation distance: 20 cm
Body region: whole body
Exposure limits applied for: general public
Power averaging over time: not applied
Applied determination process: step 2 of clause 4.1.1.2

<i>Channel Frequency (MHz)</i>	<i>ERP + tune-up tolerance (dBm)</i>	<i>ERP (W)</i>	<i>Limit threshold ERP (W)</i>	<i>Ratio of limit</i>	<i>Result</i>
2440	2.1	0.0016	0.7680	0.0021	Passed

Table 4: Result of evaluation of compliance

According to annex G.4 of ANSI C63.10:

ERP = EIRP – 2.15 dB

4.1.1.3.3 Radio technology 3

The following data are based on applicants document: Test report 260170-AU01+W03 of the test laboratory Element Materials Technology Straubing GmbH

Field strength: 91.5 dB μ V/m at 3 m at 910.3 MHz
 Calculated EIRP: -3.7 dBm
 Calculated ERP: -5.9 dBm

Information related to Exposure:

Tune-up tolerance 0 dB
 (according to the manufacturer):
 Separation distance: 20 cm
 Body region: whole body
 Exposure limits applied for: general public
 Power averaging over time: not applied
 Applied determination process: step 2 of clause 4.1.1.2

<i>Channel Frequency (MHz)</i>	<i>ERP + tune-up tolerance (dBm)</i>	<i>ERP (W)</i>	<i>Limit threshold ERP (W)</i>	<i>Ratio of limit</i>	<i>Result</i>
910.3	-5.9	0.0003	0.4661	0.00064	Passed

Table 5: Result of evaluation of compliance

EIRP is calculated using the formula of ANSI C63.10, clause 11.12.2.2:

$$\text{EIRP} = E + 20\log(d) - 104.8$$

Where: EIRP = equivalent isotropically radiated power in dBm
 E = electric field strength in dB μ V/m
 d = measurement distance in meters (m)

According to annex G.4 of ANSI C63.10:

$$\text{ERP} = \text{EIRP} - 2.15 \text{ dB}$$

4.1.2 Simultaneous transmissions - Maximum permissible exposure, except WPT

Requirement: Part 2, § 2.1091
Reference: KDB 447498 D04 Interim v01

Performed by:	Konrad Graßl	Date of test:	July 23, 2026
Result:	☒ Product exempt	☐ Product not exempt	

4.1.2.1 Requirements and limits

According to §2.1091(c)(2):

For multiple mobile or portable RF sources within a device operating in the same time averaging period, routine environmental evaluation is required if the formula in §1.1307(b)(3)(ii)(B) of this chapter is applied to determine the exemption ratio and the result is greater than 1.

According to §1.1307(b)(3)(ii)(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.

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

According to clause 2.2.2 of KDB 447498 D04 Interim v01:

This case is described in detail in § 1.1307(b)(3)(ii)(B) and covers the situations where both SAR-based and MPE-based exemption may be considered for test exemption in fixed, mobile, or portable device exposure conditions. For these cases, a device with multiple RF sources transmitting simultaneously will be considered an RF exempt device if the condition of the formula in §1.1307(b)(3)(ii)(B) is satisfied.

4.1.2.2 Results

Note(s):

1. The ratios are taken from clause 4.1.1.3
2. All radio technologies can work simultaneously.

MPE ratio of radio technology 1: 4.8E-09

MPE ratio of radio technology 2: 0.0021

MPE ratio of radio technology 3: 0.00064

<i>Radio technologies</i>	<i>MPE ratios</i>	<i>Sum of MPE ratios</i>	<i>MPE exemption limit</i>	<i>Result</i>
1 + 2 + 3	4.8E-09 + 0.0021 + 0.00064	0.0027400048	≤ 1	Passed

Table 6: Result of MPE exemption, simultaneous transmissions

4.2 Canada

4.2.1 Evaluation for separation distance > 20 cm, except 3 kHz – 10 MHz

Requirement: RSS-102 Issue 6, section 6.6

Reference: n/a

Performed by:	Konrad Graßl	Date of test:	July 23, 2026
Result:	☒ Product exempt ☐ Product not exempt		

4.2.1.1 Field reference level exposure exemption limits

According to RSS 102, section 6.6:

Field reference level (FRL) exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm (i.e. mobile devices), except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 1 W (adjusted for tune-up tolerance)
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance)
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz
- at or above 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 5 W (adjusted for tune-up tolerance)

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the EIRP was derived.

4.2.1.2 Results

4.2.1.2.1 Radio technology 1

The following data are based on applicants document: Test report 260170-AU01+W01 of the test laboratory Element Materials Technology Straubing GmbH

Field strength: 22.4 dB μ V/m at 30 m at 13.56 MHz
 Calculated EIRP: -52.8 dBm

Information related to Exposure:

Tune-up tolerance 0 dB
 (according to the manufacturer):
 Separation distance: 20 cm
 Body region: whole body
 Exposure limits applied for: general public
 Power averaging over time: not applied

<i>Channel Frequency (MHz)</i>	<i>EIRP + tuneup tolerance (dBm)</i>	<i>EIRP (W)</i>	<i>EIRP limit (W)</i>	<i>Ratio of limit</i>	<i>Result</i>
13.56	-52.8	0.0000000052	1.0000000000	0.0000000052	Passed

Table 7: Result of exemption for routine evaluation of RF exposure

EIRP is calculated using the formula of ANSI C63.10, clause 11.12.2.2:

$$\text{EIRP} = E + 20\log(d) - 104.8$$

Where: EIRP = equivalent isotropically radiated power in dBm
 E = electric field strength in dB μ V/m
 d = measurement distance in meters (m)

4.2.1.2.2 Radio technology 2

The following data are based on applicants document: Test report 260170-AU01+W02 of the test laboratory Element Materials Technology Straubing GmbH

Antenna gain: 1.4 dBi
Maximum conducted output power: 2.8 dBm at 2440 MHz
Calculated EIRP: 4.2 dBm at 2440 MHz

Information related to Exposure:

Tune-up tolerance (according to the manufacturer): 0 dB
Separation distance: 20 cm
Body region: whole body
Exposure limits applied for: general public
Power averaging over time: not applied

<i>Channel frequency (MHz)</i>	<i>EIRP + tuneup tolerance (dBm)</i>	<i>EIRP (W)</i>	<i>EIRP limit (W)</i>	<i>Ratio of limit</i>	<i>Result</i>
2440	4.2	0.0026	2.7053	0.00096	Passed

Table 8: Result of field reference level (FRL) evaluation

4.2.1.2.3 Radio technology 3

The following data are based on applicants document: Test report 260170-AU01+W03 of the test laboratory Element Materials Technology Straubing GmbH

Field strength: 91.5 dB μ V/m at 3 m at 910.3 MHz

Calculated EIRP: -3.7 dBm

Information related to Exposure:

Tune-up tolerance 0 dB
(according to the manufacturer):

Separation distance: 20 cm

Body region: whole body

Exposure limits applied for: general public

Power averaging over time: not applied

<i>Channel frequency (MHz)</i>	<i>EIRP + tuneup tolerance (dBm)</i>	<i>EIRP (W)</i>	<i>EIRP limit (W)</i>	<i>Ratio of limit</i>	<i>Result</i>
910.3	-3.7	0.00043	1.37904	0.00031	Passed

Table 9: Result of field reference level (FRL) evaluation

EIRP is calculated using the formula of ANSI C63.10, clause 11.12.2.2:

$$\text{EIRP} = E + 20\log(d) - 104.8$$

Where: EIRP = equivalent isotropically radiated power in dBm
E = electric field strength in dB μ V/m
d = measurement distance in meters (m)

4.2.2 Simultaneous transmissions - evaluation for separation distance > 20 cm, except 3 kHz – 10 MHz

Requirement: SAFETY CODE 6, section 2.2.2, note 4

Reference: ---

Performed by:	Konrad Graßl	Date of test:	July 23, 2026
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Result:	☒ Product exempt	☐ Product not exempt
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4.2.2.1 Requirements and limit

According to note 4 of section 2.2.2 of SAFETY CODE 6:

For simultaneous exposure to multiple frequencies and where exposure is estimated in terms of power density, each of the power density frequency component amplitudes shall be divided by the corresponding reference level for that frequency, and the sum of all these ratios shall not exceed unity. This may be expressed as: $\sum (S_i/SRL) \leq 1$.

4.2.2.2 Results

Note(s):

- 1 The RF exposure ratios are taken from clause 4.2.1.2.
- 2 All radio technologies can work simultaneously.

FRL ratio of radio technology 1: 0.0000000052

FRL ratio of radio technology 2: 0.00096

FRL ratio of radio technology 3: 0.00031

<i>Radio technologies</i>	<i>FRL ratios</i>	<i>Sum of FRL ratios</i>	<i>Limit</i>	<i>Result</i>
1 + 2 + 3	0.0000000052 + 0.00096 + 0.00031	0.0012700052	≤ 1	Passed

Table 10: Result of FRL exemption, simultaneous transmissions

5 Revision history

<i>Revision</i>	<i>Date</i>	<i>Issued by</i>	<i>Description of modifications</i>
0	2026-07-23	Konrad Graßl	First edition

Template: RF_FCC_IC_Human Exposure_V1.13