

07/14/2026

Control Bionics, Inc.
745 Center Street, Suite 303
Milford OH 45150
USA

Dear James Schorey,

Enclosed is the EMC test report for testing of the Control Bionics, Inc., NeuroStrip, tested to the requirements of RSS-102 Issue 6, FCC KDB 447498 D01, and EN62479: 2010

Thank you for using the services of Eurofins E&E North America. If you have any questions regarding these results or if MET can be of further service to you, please do feel free to contact me.

Sincerely,



Nancy LaBrecque
Documentation Department
Eurofins Electrical and Electronic Testing NA, Inc.

Reference: WIRA139679-SAR Exemption-R2



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RF Exposure Criteria Test Report

for the

**Control Bionics, Inc.
NeuroStrip**

Tested under

RSS-102 Issue 6, FCC KDB 447498 D01, and EN62479: 2010

Report: WIRA139679-SAR Exemption-R2

07/14/2026

Prepared For:

Control Bionics, Inc.
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Milford OH 45150
USA**

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**RF Exposure Criteria
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Bryan Taylor, Wireless Team Lead
Electromagnetic Compatibility Lab



Nancy LaBrecque
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them.

Report Status Sheet

Revision	Report Date	Reason for Revision
0	04/22/2026	Initial Issue.
1	06/16/2026	Fixed typographical error.
2	07/14/2026	TCB reviewer corrections

List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
CISPR	Comite International Special des Perturbations Radioelectriques (International Special Committee on Radio Interference)
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kiloHertz
kPa	kiloPascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	MegaHertz
μH	microHenry
μF	microFarad
μs	microseconds
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
V/m	Volts per meter
VCP	Vertical Coupling Plane

1.0 Requirements Summary

Page Number	Test Name	Result
10	EN62479: 2010 SAR Exemption (For General Public Exposure)	Exempt from SAR
11	RSS-102 Issue 6 SAR Exemption (For General Public Exposure)	Exempt from SAR
12	FCC KDB 447498 D01 SAR Exemption (For General Public Exposure)	Exempt from SAR

Table 1. Summary of Test Results

2.0 Equipment Configuration

2.1 Overview

Eurofins E&E North America was contracted by Control Bionics, Inc. to perform testing on the NeuroStrip.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Control Bionics, Inc. NeuroStrip.

The results obtained relate only to the item(s) tested.

Product Name:	NeuroStrip	
Model(s) Tested:	NeuroStrip	
Primary Power	3.6VDC	
BLE Radio Specifications	Type of Modulations:	GFSK
	Maximum EIRP	0.5dBm (1.122mW)
	EUT Frequency Ranges:	2402 – 2480MHz
	Antenna Gain ¹ :	0.5dBi
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature: 15-35° C	
	Relative Humidity: 30-60%	
	Barometric Pressure: 860-1060 mbar	
Evaluated by:	Bryan Taylor	
Test Date(s):	12/28/2025 through 1/9/2026	

Table 2. EUT Summary Table

¹ The antenna gain information was provided by Control Bionics, Inc. and may affect compliance.

2.2 Test Site

All testing was performed at Eurofins E&E North America, Austin, TX. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

2.3 References

EN62479:2010	Assessment of the compliance of low power electronic and electrical equipment with the basic restrictions related to human exposure to electromagnetic fields (10 MHz to 300 GHz)
RSS-102: Issue 6	Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
FCC KDB 447498 D01	RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices

Table 3. References

2.4 Description of Test Sample

The NeuroStrip is a body worn, battery powered device for reading physiological signals (e.g., surface EMG) and transmitting these readings via Bluetooth Low Energy (BLE) to an off-the-shelf device (Windows, OSX, iOS, Android, Linux) running an App from Control Bionics to receive the telemetry and present it to the user graphically or in some other format.

2.5 Modifications

2.5.1 Modifications to EUT

No modifications were made to the EUT.

2.5.2 Modifications to Test Standard

No modifications were made to the test standard.

2.6 Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Control Bionics, Inc. upon completion of testing.

3.0 Maximum Permissible Exposure Results

3.1 EN 62479 SAR Exemption Limits (Pmax Values)

Table A.1 – Example values of SAR-based $P_{\max}$ for some cases described by ICNIRP, IEEE Std C95.1-1999 and IEEE Std C95.1-2005

Guideline / Standard	SAR limit, $SAR_{\max}$ W/kg	Averaging mass, m g	$P_{\max}$ mW	Exposure tier ^a	Region of body ^a
ICNIRP [1]	2	10	20	General public	Head and trunk
	4	10	40	General public	Limbs
	10	10	100	Occupational	Head and trunk
	20	10	200	Occupational	Limbs

3.2 RSS-102 SAR Exemption Levels

6.3 SAR exemption limits

Devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table 11, based on the separation distance, are exempt from SAR evaluation. The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply.

Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance

Frequency (MHz)	≤ 5 mm (mW)	10 mm (mW)	15 mm (mW)	20 mm (mW)	25 mm (mW)	30 mm (mW)	35 mm (mW)	40 mm (mW)	45 mm (mW)	> 50 mm (mW)
≤ 300	45	116	139	163	189	216	246	280	319	362
450	32	71	87	104	124	147	175	208	248	296
835	21	32	41	54	72	96	129	172	228	298
1900	6	10	18	33	57	92	138	194	257	323
2450	3	7	16	32	56	89	128	170	209	245
3500	2	6	15	29	50	72	94	114	134	158
5800	1	5	13	23	32	41	54	74	102	128

The exemption limits in table 11 are based on measurements and simulations of half-wave dipole antennas at separation distances of 5 mm to 50 mm from a flat phantom, which provides a SAR value of approximately 0.4 W/kg for 1 g of tissue.

For limb-worn devices where the 10 gram of tissue applies, the exemption limits for routine evaluation in table 11 are multiplied by a factor of 2.5.

For controlled-use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in table 11 are multiplied by a factor of 5.

When the operating frequency of the device is between two frequencies located in table 11, linear interpolation shall be applied for the applicable separation distance. If the separation distance of the device is between two distances located in table 11, linear interpolation may be applied for the applicable frequency. Alternatively, the limit corresponding to the smaller distance may be employed. For example, in case of a 7 mm separation distance, either use the exception value for a 5 mm separation distance or interpolate between the limits corresponding to 5 mm and 10 mm separation distances.

For implanted medical devices, the exemption limit for routine SAR evaluation is set at an output power of 1 mW, regardless of frequency.

The SAR levels from exempted transmitters shall be included in the compliance assessment and the determination of the TER. Detailed guidance is included in sections 7.1.8 and 8.2.2.1.

3.3 SAR Exemption Levels

4.3. General SAR test exclusion guidance

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 Test Exclusion Threshold* condition(s), listed below, is (are) satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum *test separation distance* required for the exposure conditions.²⁸ The minimum *test separation distance* defined in 4.1 f) 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. To qualify for SAR test exclusion, the *test separation distances* applied must be fully explained and justified, typically in the SAR measurement or SAR analysis report, by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, according to the required *published RF exposure KDB procedures*. When no other RF exposure testing or reporting are required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for SAR test exclusion. When required, the device specific conditions described in the other *published RF exposure KDB procedures* must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops and tablets, etc.²⁹

- a) For 100 MHz to 6 GHz and *test separation distances* ≤ 50 mm, the 1-g and 10-g *SAR test exclusion thresholds* are determined by the following:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f_{\text{GHz}}}] \leq 3.0 \text{ for 1-g SAR, and } \leq 7.5 \text{ for 10-g extremity SAR,}^{30} \text{ where}$$

Test Procedure:

The maximum possible conducted output power from the NeuroStrip was added to the antenna gain to arrive at the maximum possible EIRP. This value was compared to the exemption limits from RSS-102, and EN62479.

For the FCC, KDB 447498 D01 includes an exemption formula that was applied that is based on the minimum separation distance from the user, maximum output power, and frequency.

Test Results:

The NeuroStrip was **exempt** from SAR for FCC, ISED, and the Radio Equipment Directive. The maximum output power was lower than the exemption levels in each case.

Frequency	Max Output Power (dBm)	Antenna Gain (dBi)	Max EIRP (dBm)	Max EIRP (mW)
2402MHz	1.59	0.5	2.09	1.6

RSS-102 SAR Exemption Level: 3mW
EN62479 SAR Exemption Level: 20mW

FCC Exemption Calculation:

100 MHz to 6 GHz and separation distance $\leq$ 50 mm KDB 447498 D01 v06 4.3.1.a			
Description	Value	Unit	Comments
Max Power of Channel	1.44	mW	1.59dBm converted to mW
Minimum Separation Distance	5	mm	
Frequency	2.402	GHz	
Max Power of Channel (Rounded)	1.44	mW	Rounded to nearest 0.01 mW
Minimum Separation Distance (Rounded)	5	mm	Rounded to nearest mm, limited to 5 mm
SAR Exclusion Threshold	0.446		Max power, mW / min. separation distance, mm $\times$ $\sqrt{\text{frequency, GHz}}$
Excluded from 1-g SAR?	Yes		Threshold $\leq$ 3.0
Excluded from 10-g extremity SAR?	Yes		Threshold $\leq$ 7.5