

RF EXPOSURE REPORT

Applicant	:	Sublue Underwater AI Co.,Ltd
Address	:	Building 7, Jinbin Development Industrial Park, #45Muning Road, TEDA.TianJin China.
Manufacturer	:	Sublue Underwater AI Co.,Ltd
Address	:	Building 7, Jinbin Development Industrial Park, #45Muning Road, TEDA.TianJin China.
Equipment under Test	:	Sublue Underwater Scooter
Model No.	:	Vapor Pro Floater
Trade Mark	:	SUBLUE
FCC ID	:	2ASEE-AP8003-1
Report No.	:	LS-R26032023-12F05
Issue Date	:	May. 25, 2026



LabSure Testing Services (Suzhou) Co., Ltd.

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Standard Used: 47 CFR FCC Part 2.1093, KDB447498 D04 Interim General RF Exposure Guidance v01

We Declare:

The equipment described above is assessed by LabSure Testing Services (Suzhou) Co., Ltd. and in the configuration assessed the equipment complied with the standards specified above. The assessed results are contained in this report and LabSure Testing Services (Suzhou) Co., Ltd. is assumed of full responsibility for the accuracy and completeness of these assess.

After evaluation, our opinion is that the equipment in accordance with above standard.

Report No:	LS-R26032023-12F05		
Sample No:	Y26032023-07, Y26032023-08		
Date of Receipt:	Apr. 07, 2026	Date of Test:	Apr. 07, 2026~ May. 24, 2026

Prepared By:

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Bacon Dong/Engineer

Reviewed By:

leon wu

Leon Wu/Director

Authorized By:

Chris Zhong

Chris Zhong/Manager

Note: This report applies to above tested sample only. This report shall not be reproduced in parts without written approval of LabSure Testing Services (Suzhou) Co., Ltd. The results in this report apply to the test sample(s) mentioned above at the time of the testing period only and are not to be used to indicate applicability to other similar products. This report does not imply that the product(s) has met the criteria for certification.

The results reported herein have been performed in accordance with the laboratory's terms of accreditation.

Revision History

Rev.	Revisions	Issue Date	Revised By
---	Initial issue	May. 25, 2026	

1. General information

1.1. Description of Equipment

EUT Name	: Subblue Underwater Scooter
Model Number	: Vapor Pro Floater
EUT Function Description	: Please reference user manual of this device
Power supply	: DC 3.7V from the battery
Radio Technology	: 2.4GHz WiFi, Bluetooth (LE)
Operation frequency	: WiFi: 2412MHz-2462MHz for 20MHz bandwidth 2422MHz-2452MHz for 40MHz bandwidth BLE: 2402MHz-2480MHz
Modulation	: 2.4GHz WiFi: IEEE 802.11b/g/n (HT20, HT40) Bluetooth (LE): GFSK
Transmitter rate	: 2.4GHz WiFi: IEEE 802.11b: 1, 2, 5.5, 11 Mbps IEEE 802.11g: 6, 9, 12, 18, 24, 36, 48, 54 Mbps IEEE 802.11n HT20, HT40: MCS0~MCS7 BLE: 1Mbps
Antenna Type	: FPC Antenna
Antenna Gain	: For 2.4GHz WiFi: Max. Peak antenna gain: 1.25dBi For BLE : Max. Peak antenna gain: 1.25dBi (Declare by customer and the lab isn't responsible for the value)
Exposure category	: General population/uncontrolled environment
Tune-up Power	: 2.4GHz WiFi: Tune-up Power: 15.5dBm $\pm$ 1dB BLE: Tune-up Power: 6dBm $\pm$ 1dB

1.2. Assess laboratory

Lab Information	Company Name: LabSure Testing Services (Suzhou) Co., Ltd. Address: Phase II, No.16 Runsheng Road, Suzhou Industrial Park, Suzhou, People's Republic of China. Tel: +86-0512-62531270, E-mail: labsure@lab-sure.com, www.lab-sure.com
Accreditation Certificate	A2LA (Certificate No.: 7346.01) LabSure Testing Services (Suzhou) Co., Ltd. has been assessed and proved to be in compliance with A2LA. FCC (FCC Designation No.: CN1397) LabSure Testing Services (Suzhou) Co., Ltd. has been recognized to perform compliance testing on equipment subject to the Commission's Declaration of Conformity (DoC) and Certification rules. IC (IC Designation No.: 32952; CAB No.:CN0182) LabSure Testing Services (Suzhou) Co., Ltd. has been recognized to perform compliance testing on equipment subject to the Commission's Declaration of Conformity (DoC) and Certification rules.
Note 1: All tests measurement facilities use to collect the measurement data are located at Phase II, No.16 Runsheng Road, Suzhou Industrial Park, Suzhou, People's Republic of China Note 2: For below 30MHz, lab had performed measurements at test anechoic chamber and comparing to measurements obtained on an open field site. These measurements below 30MHz had been correlated to measurements performed on an OFS. Note 3: The test anechoic chamber in LabSure Testing Services (Suzhou) Co., Ltd. had been calibrated and compared to the open field sites and the test anechoic chamber is shown to be equivalent to or worst case from the open field site.	

2. RF Exposure Evaluation

2.1. Requirement

Systems operating under the provisions of FCC 47 CFR section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

In accordance with 47 CFR FCC Part 2 Subpart J, section 2.1093 this device has been defined as portable device whereby a distance from 0.5 centimeters to 20 centimeters normally can be maintained between the user and the device, and below RF Permissible Exposure limit shall comply with Limits for General Population/Uncontrolled Exposure

(B) Limits for General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f)*	30
30-300	27.5	0.073	0.2	30
300-1500			F/1500	30
1500-100,000			1.0	30

Note: f = frequency in MHz ; *Plane-wave equivalent power density

According to KDB447498 D04 Interim General RF Exposure Guidance v01 B.3 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
fL MHz		fH 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						

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) and § 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.

2.2. Calculation method

According with Table B.1, RF source frequency is 2.4GHz, R=0.16m

Threshold ERP = $19.2R^2 = 19.2 \times (0.16)^2 = 491.5 \text{ mW}$

2.3. Estimation result

The closest distance from all wireless RF components to the touchable handle is 16cm. So we used the 16cm distance to evaluate the MPE

Mode	Max Output Tune-up Power (dBm)	Max. Output Tune-up Power (mW)	Antenna Gain (dBi)	Antenna Gain (numerical)	Max. EIRP (mW)	P _{th} (mW)	Result
2.4GHz WiFi	16.5	44.67	1.25	1.33	59.57	491.5	Pass
BLE	7	5.01	1.25	1.33	6.66	491.5	Pass

Result: Pass

Conclusion: The measurement results comply with the FCC Limit: 47 CFR FCC Part 1.1307(b)(3) (i)(C) and the requirements of 47 CFR Part 2.1093 for the uncontrolled RF Exposure of portable device.

END OF REPORT