

## **RF Exposure**

Product: Robot home 3.0  
Applicant: Robot Home Co., Ltd.  
Model: RBT3.0  
Address: 21F, 1-5-8, Jingumae, Shibuya-ku, Tokyo, Japan  
FCC ID: 2ATJ5RBT3

### **[For BLE device]**

Per KDB 447498 D01 General RF Exposure Guidance v06 (10/23/2015) section 4.3.1 (a)

Stand alone SAR test exclusion threshold is applied;

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

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

- where  $f(\text{GHz})$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- The values 3.0 and 7.5 are referred to as numeric thresholds in step b) below

### **Exclusion threshold calculation:**

Freq: BLE / 2 480 MHz

Tune-up max. power : 3.00 dBm (1.995 mW)

Min. Test separation distance : 5 mm

SAR exclusion threshold:  $[1.995/5] \times [\sqrt{2.480}] = 0.628$  (=0.6, is rounded to one decimal place)

\* Tune-up tolerance : 2 dBm +/- 1.0 dB

**Conclusion: The Threshold level is much smaller than the limit, no SAR measurement is necessary.**

## [For NFC device]

The following excerpts from KDB447498 indicate the procedure to follow to calculate power exclusion thresholds for transmitters operating below 100MHz and within 50mm separation distance. The exclusion threshold calculation was carried out using 13.56MHz as the transmit frequency and the measured field strength at 3m from the Part 15.225 was used to calculate the radiated output power.

Per KDB 447498 D01 General RF Exposure Guidance v06 (10/23/2015) section 4.3.1 (c)

Stand alone SAR test exclusion threshold is applied;

b) 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 (also illustrated in Appendix B):

- 1) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm)·(f<sub>(MHz)</sub>/150)]} mW, for 100 MHz to 1500 MHz
- 2) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm)·10]} mW, for > 1500 MHz and ≤ 6 GHz

c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):

- 1) For *test separation distances* > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by [1 + log(100/f<sub>(MHz)</sub>)]
- 2) For *test separation distances* ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by ½**
- 3) SAR measurement procedures are not established below 100 MHz.

## Appendix C

### ***SAR Test Exclusion Thresholds for < 100 MHz and < 200 mm***

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table. The equation and threshold in 4.3.1 must be applied to determine SAR test exclusion.

| MHz  | < 50 | 50   | 60   | 70   | 80   | 90   | 100  | 110  | 120  | 130  | 140  | 150  | 160  | 170  | 180  | 190  | mm |
|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|----|
| 100  | 237  | 474  | 481  | 487  | 494  | 501  | 507  | 514  | 521  | 527  | 534  | 541  | 547  | 554  | 561  | 567  | mW |
| 50   | 308  | 617  | 625  | 634  | 643  | 651  | 660  | 669  | 677  | 686  | 695  | 703  | 712  | 721  | 729  | 738  |    |
| 10   | 474  | 948  | 961  | 975  | 988  | 1001 | 1015 | 1028 | 1041 | 1055 | 1068 | 1081 | 1095 | 1108 | 1121 | 1135 |    |
| 1    | 711  | 1422 | 1442 | 1462 | 1482 | 1502 | 1522 | 1542 | 1562 | 1582 | 1602 | 1622 | 1642 | 1662 | 1682 | 1702 |    |
| 0.1  | 948  | 1896 | 1923 | 1949 | 1976 | 2003 | 2029 | 2056 | 2083 | 2109 | 2136 | 2163 | 2189 | 2216 | 2243 | 2269 |    |
| 0.05 | 1019 | 2039 | 2067 | 2096 | 2125 | 2153 | 2182 | 2211 | 2239 | 2268 | 2297 | 2325 | 2354 | 2383 | 2411 | 2440 |    |
| 0.01 | 1185 | 2370 | 2403 | 2437 | 2470 | 2503 | 2537 | 2570 | 2603 | 2637 | 2670 | 2703 | 2737 | 2770 | 2803 | 2837 |    |

**Exclusion threshold calculation:**

- Per 4.3(b)(1) the SAR exclusion threshold for <50mm at 100MHz = 237mW
- Per 4.3(c)(1) for test separation distances between 50mm and 200mm the power threshold is multiplied by a factor of  $[1 + \log(100/f_{\text{(MHz)}})]$  Using 13.56MHz as the transmit frequency this factor is 1.86. Multiplying this factor and the exclusion threshold from 4.3(b)(1) above we end up with a value of:

$$1.86 \times 237\text{mW} = 440.82\text{mW}$$

- Per 4.3(c)(2) for test separation distances below 50mm the power threshold determined by 4.3(c)(1) are multiplied by 0.5. Doing this we have an exclusion threshold for 13.56MHz and a separation distance of under 50mm of:

$$440.82\text{mW} \times 0.5 = 220.41\text{mW}$$

The maximum measured RF field strength from the part 15.225 testing was **17.01** dBuV/m at 30m or **57.01** dBuV/m at 3m using 40dB per decade factor. This translates to an EIRP of **0.00001** mW which is much less than the exclusion threshold of 220.41mW calculated above.

**Conclusion: The Threshold level is much smaller than the limit, no SAR measurement is necessary.**