

Test report No:
2660507R.703B

SAR Exemption Evaluation Report

Product Name	PEPS
Trademark	KOSTAL
Model and /or type reference	SMART KEY MODULE
FCC ID	2AYARBR1SKM
Applicant's name / address	Kostal (shanghai) Management Co.,Ltd. No.189 Xingting Road, Jiading District, Shanghai, P.R. China
Test method requested, standard	FCC 47CFR §2.1093
Verdict Summary	IN COMPLIANCE
Documented By (name / position & signature)	Tim Cao / Project Manager 
Approved by (name / position & signature)	Frank He / Technical Manager 
Date of issue	2026-07-22
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COMPETENCES AND GUARANTEES

DEKRA is a testing laboratory competent to carry out the tests described in this report.

In order to assure the traceability to other national and international laboratories, DEKRA has a calibration and maintenance program for its measurement equipment.

DEKRA guarantees the reliability of the data presented in this report, which is the result of the measurements and the tests performed to the item under test on the date and under the conditions stated in the report and it is based on the knowledge and technical facilities available at DEKRA at the time of performance of the test.

DEKRA is liable to the client for the maintenance of the confidentiality of all information related to the item under test and the results of the test.

The results presented in this Test Report apply only to the particular item under test established in this document.

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GENERAL CONDITIONS

Test Location	No. 99, Hongye Road, Suzhou Industrial Park Suzhou, 215006, P.R. China
Date(receive sample)	Jun. 16, 2026
Date (start test)	Jul. 01, 2026
Date (finish test)	Jul. 15, 2026

1. This report is only referred to the item that has undergone the test.
2. This report does not constitute or imply on its own an approval of the product by the Certification Bodies or Competent Authorities.
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ENVIRONMENTAL CONDITIONS

The climatic conditions during the tests are within the limits specified by the manufacturer for the operation of the EUT and the test equipment. The climatic conditions during the tests were within the following limits:

Ambient temperature	15 °C – 35 °C
Relative Humidity air	30% - 60%

If explicitly required in the basic standard or applied product / product family standard the climatic values are recorded and documented separately in this test report.

POSSIBLE TEST CASE VERDICTS

Test case does not apply to test object	N/A
Test object does meet requirement	P (Pass) / PASS
Test object does not meet requirement	F (Fail) / FAIL
Not measured	N/M

ABBREVIATIONS

For the purposes of the present document, the following abbreviations apply:

EUT	: Equipment Under Test
QP	: Quasi-Peak
CAV	: CISPR Average
AV	: Average
CDN	: Coupling Decoupling Network
SAC	: Semi-Anechoic Chamber
OATS	: Open Area Test Site
BW	: Bandwidth
AM	: Amplitude Modulation
PM	: Pulse Modulation
HCP	: Horizontal Coupling Plane
VCP	: Vertical Coupling Plane
U_N	: Nominal voltage
T_x	: Transmitter
R_x	: Receiver
N/A	: Not Applicable
N/M	: Not Measured

DOCUMENT HISTORY

Report No.	Version	Description	Issued Date
2660507R.703B	V1.0	Initial issue of report.	2026-07-22

REMARKS AND COMMENTS

1. The equipment under test (EUT) does meet the essential requirements of the stated standard(s)/test(s).
2. These test results on a sample of the device are for the purpose of demonstrating Compliance with FCC 47CFR §2.1093.
3. The measurement result is considered in conformance with the requirement if it is within the prescribed limit, It is not necessary to account the uncertainty associated with the measurement result.
4. The test results relate only to the samples tested.
5. The test report shall not be reproduced without the written approval of DEKRA Testing and Certification (Suzhou) Co., Ltd.
6. This report will not be used for social proof function in China market.
7. DEKRA declines any responsibility with the following test data provided by customer that may affect the validity of result:
 - Chapter 1.1 General Description of the Item(s);

1.1 General Description of the Item(s)

Product Name..... :	PEPS
Trademark	KOSTAL
Model No. :	SMART KEY MODULE
Operating Temperature..... :	-40°C - 85°C
Power Supply	12 Vdc
Test EUT	#1
Manufacturer	Kostal (shanghai) Management Co.,Ltd.
Manufacturer address	No.189 Xingting Road, Jiading District, Shanghai, P.R.China
Wireless specification	IEEE 802.15.4 (UWB)
Operating frequency range(s)..... :	6 GHz to 8.5 GHz
Type of Modulation	BPM/BPSK
Antenna Type	On board Antenna
Antenna Gain..... :	-2 dBi
Wireless Specification..... :	RFID
Operating frequency range(s)..... :	125 kHz
Type of modulation	ASK
Number of channel..... :	1
Antenna Type	LF Antenna
Antenna Gain..... :	-5 dBi

Remark:

As above information is provided and confirmed by the applicant. DEKRA is not liable to the accuracy, suitability, reliability or/and integrity of the information.

2. RF Exposure Evaluation

2.1. Limits: KDB 447498 D04

B.2 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of § 1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1 mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph § 1.1307(b)(3)(ii)(A).

The 1 mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

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
f_L MHz		f_H 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 columns.						

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.

B.4 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of § 1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by Formula (B.2).

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

where

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

and f is in GHz, d is the separation distance (cm), and ERP_{20cm} is per Formula (B.1).

The example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

Frequency (MHz)	Distance (mm)										
		5	10	15	20	25	30	35	40	45	50
	300	39	65	88	110	129	148	166	184	201	217
	450	22	44	67	89	112	135	158	180	203	226
	835	9	25	44	66	90	116	145	175	207	240
	1900	3	12	26	44	66	92	122	157	195	236
	2450	3	10	22	38	59	83	111	143	179	219
	3600	2	8	18	32	49	71	96	125	158	195
	5800	1	6	14	25	40	58	80	106	136	169

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	

2.2. Test Procedure

Software provided by client enabled the EUT to transmit and receive data at lowest, middle and highest channel individually.

The temperature and related humidity: 18°C and 78% RH.

2.3. Test Result of RF Exposure Evaluation

Product	:	PEPS
Test Item	:	RF Exposure Evaluation
Test Site	:	AC-6

Exemption

Wireless Configuration	Frequency	Pmax	Pmax	Pmax	Limit
		(dBμV/m)	(dBm)	(mw)	(mw)
RFID	125KHz	103.43	8.23	6.65	925
UWB	7987MHz	N/A	-41.412	7.22E-8	1
Note : dBm = dBμV/m - 95.2					

Note: Maximum EIRP reference test reports: 2660507R.701B, 2660507R.702B, So the safe use distance of the EUT is 5mm, Access Point without any other radio equipment. SAR was not required

_____ The End _____