



RF Exposure Evaluation

For

WYBOTICS CO., LTD.

Underwater cleaning equipment wireless charging seat

Test Model: WY210

Prepared for : WYBOTICS CO., LTD.
Address : No.30, 4th Street Zhongnan, West Zone, TEDA, Tianjin, China

Prepared by : Shenzhen LCS Compliance Testing Laboratory Ltd.
Address : 101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Shajing Street,
Baoan District, Shenzhen, China
Tel : (+86)755-82591330
Fax : (+86)755-82591332
Web : www.LCS-cert.com
Mail : webmaster@LCS-cert.com

Date of receipt of test sample : May 27, 2024
Number of tested samples : 2
Sample No. : A240516079-1, A240516079-2
Serial number : Prototype
Date of Test : May 27, 2024 ~ May 22, 2025
Date of Report : May 23, 2025



**RF Exposure Evaluation****Report Reference No. : LCSA03135034EB**

Date Of Issue..... : May 23, 2025

Testing Laboratory Name..... : Shenzhen LCS Compliance Testing Laboratory Ltd.Address..... : 101, 201 Bldg A & 301 Bldg C, Juji Industrial Park Shajing Street,
Baoan District, Shenzhen, ChinaTesting Location/ Procedure..... : Full application of Harmonised standards ■
Partial application of Harmonised standards □
Other standard testing method □**Applicant's Name..... : WYBOTICS CO., LTD.**

Address..... : No.30, 4th Street Zhongnan, West Zone, TEDA, Tianjin, China

Test SpecificationStandard..... : FCC KDB publication 680106 D01 Wireless Power Transfer v04
FCC CFR 47 part1 1.1310
FCC CFR 47 part2 2.1091
FCC CFR 47 part 18.107
Test Report Form No..... : TRF-4-E-214 A/0
TRF Originator..... : Shenzhen LCS Compliance Testing Laboratory Ltd.
Master TRF..... : Dated 2011-03**Shenzhen LCS Compliance Testing Laboratory Ltd. All rights reserved.**

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Test Item Description..... : Underwater cleaning equipment wireless charging seat

Trade Mark..... : N/A

Test Model..... : WY210

Ratings..... : Please Refer to Page 6

Result : Pass**Compiled by:**

Ling Zhu/ Administrator

Supervised by:

Jack Liu / Technique principal

Approved by:

Gavin Liang/ Manager



**FCC TEST REPORT**

Test Report No. : LCSA03135034EB	May 23, 2025 Date of issue
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Test Model.....	: WY210
EUT.....	: Underwater cleaning equipment wireless charging seat
Applicant.....	: WYBOTICS CO., LTD.
Address.....	: No.30, 4th Street Zhongnan, West Zone, TEDA, Tianjin, China
Telephone.....	: /
Fax.....	: /
Manufacturer.....	: WYBOTICS CO., LTD.
Address.....	: No.30, 4th Street Zhongnan, West Zone, TEDA, Tianjin, China
Telephone.....	: /
Fax.....	: /
Factory.....	: WYBOTICS CO., LTD.
Address.....	: No.30, 4th Street Zhongnan, West Zone, TEDA, Tianjin, China
Telephone.....	: /
Fax.....	: /
Test Result	Pass

The test report merely corresponds to the test sample.

It is not permitted to copy extracts of these test result without the written permission of the test laboratory.





Revision History

Report Version	Issue Date	Revision Content	Revised By
000	May 23, 2025	Initial Issue	--





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1. Product Information

EUT : Underwater cleaning equipment wireless charging seat

Test Model : WY210

Power Supply : For AC Adapter Input: 100-240V~, 50/60Hz, 2.5A
Adapter Output: 29.4V=3.0A, 88.2W

Hardware Version : /

Software Version : /

Bluetooth :

Frequency Range : 2402MHz~2480MHz

Channel Number : 79 channels for Bluetooth V5.0 (DSS)
40 channels for Bluetooth V5.0 (DTS)

Channel Spacing : 1MHz for Bluetooth V5.0 (DSS)
2MHz for Bluetooth V5.0 (DTS)

Modulation Type : GFSK, $\pi/4$ -DQPSK, 8-DPSK for Bluetooth V5.0 (DSS)
GFSK for Bluetooth V5.0 (DTS)

Bluetooth Version : V5.0

Antenna Description : PCB Antenna, 4.16dBi(Max.)

WIFI(2.4G Band) :

Frequency Range : 2412MHz~2462MHz

Channel Spacing : 5MHz

Channel Number : 11 Channels for 20MHz bandwidth (2412~2462MHz)
7 Channels for 40MHz bandwidth (2422~2452MHz)

Modulation Type : IEEE 802.11b: DSSS (CCK, DQPSK, DBPSK)
IEEE 802.11g: OFDM (64QAM, 16QAM, QPSK, BPSK)
IEEE 802.11n: OFDM (64QAM, 16QAM, QPSK, BPSK)

Antenna Description : PCB Antenna, 4.16dBi(Max.)

433MHz Operation frequency : 433.92

Modulation Type : FSK

Channel Number : 1

Antenna Type : PCB Antenna

Antenna Gain : 0dBi (Max)

Wireless Charging :

Operating Frequency : 110.0~205.0KHz

Modulation Type : Msk

Exposure category : General population/uncontrolled environment

EUT Type : Production Unit

Device Type : Mobile Device

Exposure category : General population/uncontrolled environment

Note: For a more detailed antenna description, please refer to the antenna specifications or the antenna report provided by the customer.





2. Evaluation Method

Per KDB 680106 D01 Section 3. RF Exposure Requirements;

- 1) Wireless power transfer devices must comply with RF exposure requirements for all design configurations in which they can operate. At a minimum, RF exposure must be evaluated for the worst-case scenario, typically when the transmitter, while delivering energy to a client device, is operating at maximum output power. RF exposure compliance for equipment authorization must be determined following the guidance of KDB447498, which includes consideration of the different test requirements for *Mobile Device* and *Portable Device* exposure categories, as defined in §§ 2.1091 and 2.1093 of the Rules.
- 2) The RF exposure limits, as set forth in § 1.1310, do not cover the frequency range below 100 kHz for Specific Absorption Rate (SAR) and below 300 kHz for Maximum Permitted Exposure (MPE). In addition, present limitations of RF exposure evaluation systems prevent an accurate evaluation of SAR below 4 MHz. For these reasons, a specific MPE-based RF Exposure compliance procedure for devices operating in the aforementioned low-frequency ranges has been set in place. This procedure is applicable to Equipment Authorization of all RF devices, thus including, but not limited to, Part 18 and WPT devices. Accordingly, for § 2.1091-*Mobile* devices, the MPE limits between 100 kHz to 300 kHz are to be considered the same as those at 300 kHz in Table 1 of § 1.1310, that is, 614 V/m and 1.63 A/m, for the electric field and magnetic field, respectively. For § 2.1093-*Portable* devices below 4 MHz and down to 100 kHz, the MPE limits in § 1.1310 (with the 300 kHz limit applicable all the way down to 100 kHz) can be used for the purpose of equipment authorization in lieu of SAR evaluations.

Furthermore, consistent with FCC's equipment authorization RF exposure guidance, any device (both portable and mobile) operating at frequencies below 100 kHz is considered compliant for the purpose of equipment authorization when the external (unperturbed) temporal peak field strengths do not exceed the following reference levels:

83 V/m for the electric field strength (E)

and 90 A/m for the magnetic field strength (H)

These data may be provided through measurements and/or numerical simulations, and for all the positions in space relevant for any possible body exposure.

- 3) "Large size" probes may prevent the measurement of E- and/or H-fields near the surface of the radiating structure (e.g., a WPT source coil), as in the example shown in Figure 1.

If the center of the probe sensing element is located more than 5 mm from the probe outer surface, the field strengths need to be estimated through modeling for those positions that are not reachable. The estimates may be done either via numerical calculation, or via analytic model: e.g., approximated formulas for circular coils, dipoles, etc., may be acceptable if it is shown that the model is applicable for the design parameters considered. A typical example is the use of a quasi-static approximation formula for a low-frequency magnetic field source. These estimates shall include points spaced no more than 2 cm from each other. Thus, in the example of

Figure 1, at least the estimates at 0 cm² and 2 cm are required, while only one point would not be sufficient. In addition, the model needs to be validated through the probe measurements for the two closest points to the device surface, and with 2-cm increments, as indicated in Figure 1. In that example, the same model must also be applied to the 4 cm and 6 cm positions, and then compared with the measured data, for validation purposes. The validation is considered sufficient if a 30% agreement between the model and the (E- and/or H-field) probe measurements is demonstrated. If such a level of agreement cannot be shown, a more accurate model (and/or a smaller probe) shall be used.



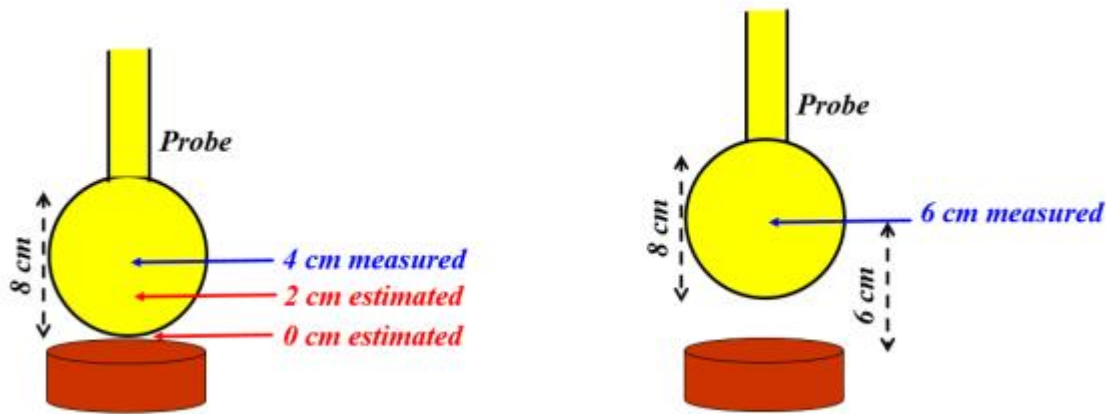


Figure 1. Example of probe (in yellow) measurements in points close to the WPT device (in red/brown). The probe radius is 4 cm, thus the closest point to the device where the field can be measured is at 4 cm from the surface (this example assumes that the probe calibration refers to the center of the sensing element structure, in this case a sphere of 4 cm radius). Data at 0 cm and 2 cm must be estimated through a model, and then the same model must be validated via comparison with the actual measurements at 4 cm and 6 cm, where the probe center can be positioned and collect valid data.

- 4) Part 18 Wireless Power Transfer up to One-Meter Distance. This section applies only to WPT transmitters that, by design, can provide power to a load located at a distance no greater than one meter. This distance shall be measured between the closest points between the transmitter and the receiver enclosure surfaces. For instance, two coils positioned as in Figure 2-a may be operated and considered under the provisions of this section, because both receivers are within one-meter distance from the transmitter. However, the case in Figure 2-b cannot be considered in the same way, and it is treated according to the prescription of Section 5.3.

For WPT designs with more than one radiating structure the distance to the load shall be considered as in Figure 3, thus measured between the receiver and the closest transmitting structure.

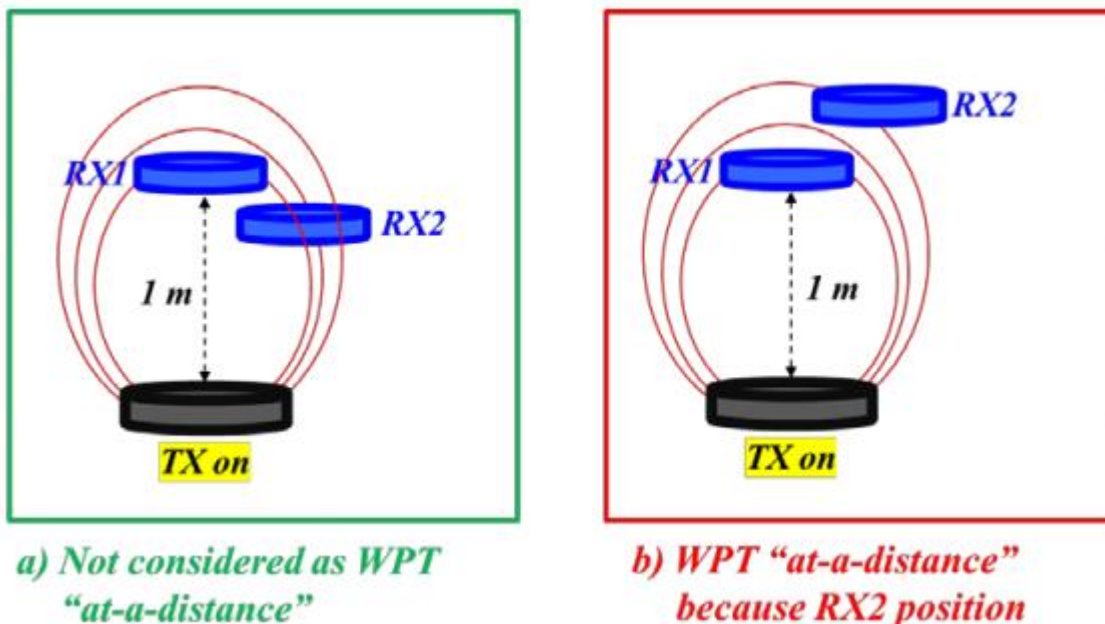


Figure 2-a) For multiple-receiver systems (here shown with two receivers, indicated with RX1 and RX2) the one-meter distance limit must apply for all the receivers that are engaged in the charging process. **b)** The WPT system is considered "at-a-distance" because it can function when the RX2 is further away than one meter from the transmitter.



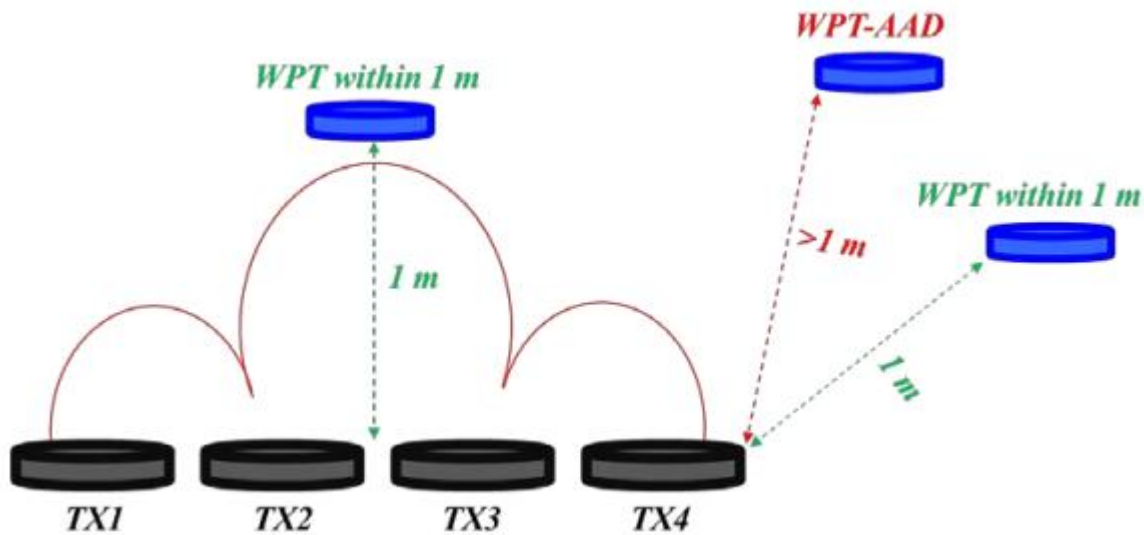


Figure 3. For multiple-coil transmitter systems, the one-meter distance limit is measured from the closest coil edge. A WPT within one meter operates with loads configured as those labeled in green font, if a load can be powered beyond one meter (in red), then it shall be considered “at-a-distance”

There might be situations where the WPT RF emissions are limited enough that even operations in a “crowded” environment, where many similar WPT devices are present, do not pose significant EMC and RF exposure concerns. In this scenario, and for devices operating within a one-meter distance from the receiver, as defined above, a manufacturer will not have to submit an “Equipment Compliance Review” KDB, and receive FCC concurrence before proceeding with equipment authorization. This exception to the requirement of submitting the ECR to obtain FCC concurrence only applies when all the following criteria (1) through (6) are met:

- (1) The power transfer frequency is below 1 MHz.
- (2) The output power from each transmitting element (e.g., coil) is less than or equal to 15 watts.
- (3) A client device providing the maximum permitted load is placed in physical contact with the transmitter (i.e., the surfaces of the transmitter and client device enclosures need to be in physical contact)
- (4) Only § 2.1091- Mobile exposure conditions apply (i.e., this provision does not cover § 2.1093 – Portable exposure conditions).
- (5) The E-field and H-field strengths, at and beyond 20 cm surrounding the device surface, are demonstrated to be less than 50% of the applicable MPE limit, per KDB 447498, Table 1. These measurements shall be taken along the principal axes of the device, with one axis oriented along the direction of the estimated maximum field strength, and for three points per axis or until a 1/d (inverse distance from the emitter structure) field strength decay is observed. Symmetry considerations may be used for test reduction purposes. The device shall be operated in documented worst-case compliance scenarios (i.e., the ones that lead to the maximum field components), and while all the radiating structures (e.g., coils or antennas) that by design can simultaneously transmit are energized at their nominal maximum power.
- 5) For systems with more than one radiating structure, the conditions specified in (5) must be met when the system is fully loaded (i.e., clients absorbing maximum power available), and with all the radiating structures operating at maximum power at the same time, as per design conditions. If the design allows one or more radiating structures to be powered at a higher level while other radiating structures are not powered, then those cases must be tested as well. For instance, a device may use three RF coils powered at 5 W, or one coil powered at 15 W: in this case, both scenarios shall be tested





3. Evaluation Limit

3.1 Refer evaluation method

[ANSI C95.1-1999](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

[FCC KDB publication 680106 D01 Wireless Power Transfer v04](#): EQUIPMENT AUTHORIZATION OF WIRELESS POWER TRANSFER DEVICES

[FCC CFR 47 part1 1.1310](#): Radiofrequency radiation exposure limits.

[FCC CFR 47 part2 2.1091](#): Radiofrequency radiation exposure evaluation: mobile devices

[FCC CFR 47 part 18.107](#): Industrial, Scientific, and Medical Equipment

3.2 Limit

Limits for Maximum Permissible Exposure (MPE)/Controlled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm ²)	Averaging Time (minute)
Limits for Occupational/Controlled Exposure				
0.3-3.0	614	1.63	*100	6
3.0-30	1842/f	4.89/f	*900/f ²	6
30-300	61.4	0.163	1.0	6
300-1,500	/	/	f/300	6
1,500-100,000	/	/	5	6

Limits for Maximum Permissible Exposure (MPE)/Uncontrolled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm ²)	Averaging Time (minute)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*100	30
1.34-30	824/f	2.19/f	*180/f ²	30
30-300	27.5	0.073	0.2	30
300-1,500	/	/	f/1500	30
1,500-100,000	/	/	1.0	30

F=frequency in MHz

*=Plane-wave equivalent power density

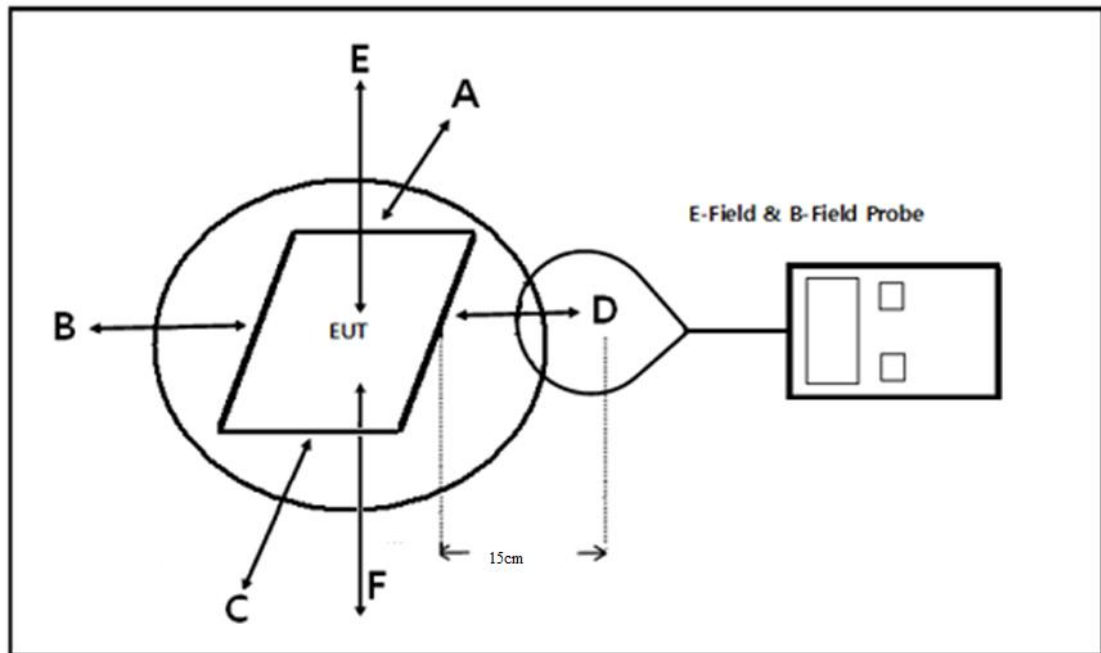
According to FCC KDB 680106 D01 Section 3. RF Exposure Requirements clause 3 the Emission-Limits in the frequency range from 100 KHz to 300 KHz should be assessed versus the limits at 300 KHz in Table 1 of CFR 47 – Section 1.310 as following (measured distance shall be 15cm from the center of the probe to the edge of the device):

	E-Field	*/*	B-Field
Frequency	V/m	A/m	uT
0.3 MHz – 3.0 MHz	614	1.613	2.0
3.0 MHz – 30 MHz	824/f (=27.5 _{30MHz})	2.19/f (=0.073 _{30MHz})	--

A KDB inquire was required to determine/confirm the applicable limits below 100 KHz.



4. Test Setup Diagram



5. Test Equipment

Item	Equipment	Manufacturer	Model No.	Serial No.	Cal Date	Due Date
1	Exposure Level Tester	Narda	ELT-400	N-0713	2023-10-18	2024-10-17
2	B-Field Probe	Narda	ELT-400	M-1154	2023-10-18	2024-10-17
3	Electric field probe	Narda	EP601	611WX70332	2023-01-29	2024-01-28

Item	Equipment	Manufacturer	Model No.	Serial No.	Cal Date	Due Date
1	Exposure Level Tester	Narda	ELT-400	N-0713	2024-11-11	2025-11-10
2	B-Field Probe	Narda	ELT-400	M-1154	2024-10-08	2025-10-07
3	Electric field probe	Narda	EP601	611WX70332	N/A	N/A

6. Measurement Procedure

- The RF exposure test was performed on 360 degree turn table in anechoic chamber.
- The measurement probe was placed at test distance (15cm and 20cm) which is between the edges of the charger and the geometric center of probe.
- The turn table was rotated 360d degree to search of highest strength.
- The highest emission level was recorded and compared with limit as soon as measurement of each points (A, B, C, D, E) were completed.
- The EUT were measured according to the dictates of KDB 680106D01v03.





7. Equipment Approval Considerations

The EUT does comply with item 5.2 of KDB 680106 D01v04 as follows table;

Requirements of KDB 680106 D01	Yes / No	Description
Power transfer frequency is less than 1 MHz	Yes	The device operates in the frequency range 110.1~205KHz,
The output power from each transmitting element (e.g., coil) is less than or equal to 15 watts.	Yes	The device contains only one transmitter coils and the maximum output power of coil is 15W.
A client device providing the maximum permitted load is placed in physical contact with the transmitter (i.e., the surfaces of the transmitter and client device enclosures need to be in physical contact)	Yes	Client device is placed directly in contact with the transmitter.
Only § 2.1091- Mobile exposure conditions apply (i.e., this provision does not cover § 2.1093-Portable exposure conditions).	Yes	Mobile exposure conditions only
The E-field and H-field strengths, at and beyond 20 cm surrounding the device surface, are demonstrated to be less than 50% of the applicable MPE limit, per KDB 447498, Table 1. These measurements shall be taken along the principal axes of the device, with one axis oriented along the direction of the estimated maximum field strength, and for three points per axis or until a 1/d (inverse distance from the emitter structure) field strength decay is observed. Symmetry considerations may be used for test reduction purposes. The device shall be operated in documented worst-case compliance scenarios (i.e., the ones that lead to the maximum field components), and while all the radiating structures (e.g., coils or antennas) that by design can simultaneously transmit are energized at their nominal maximum power.	Yes	The EUT H-field strengths at 15 cm surrounding the device and 20 cm above the top surface from all simultaneous transmitting coils are demonstrated to be less than 50% of the MPE limit.
For systems with more than one radiating structure, the conditions specified in (5) must be met when the system is fully loaded (i.e., clients absorbing maximum power available), and with all the radiating structures operating at maximum power at the same time, as per design conditions. If the design allows one or more radiating structures to be powered at a	Yes	Only one radiating structure and tested at maximum Output Power





higher level while other radiating structures are not powered, then those cases must be tested as well. For instance, a device may use three RF coils powered at 5 W, or one coil powered at 10 W: in this case, both scenarios shall be tested

There might be situations where the WPT RF emissions are limited enough that even operations in a “crowded” environment, where many similar WPT devices are present, do not pose significant EMC and RF exposure concerns. In this scenario, and for devices operating within a one-meter distance from the receiver, as defined above, a manufacturer will not have to submit an “Equipment Compliance Review” KDB, and receive FCC concurrence before proceeding with equipment authorization. This exception to the requirement of submitting the ECR to obtain FCC concurrence only applies when all the following criteria (1) through (6) are met.

8. and H field Strength

Test Modes		
Mode 1	AC/DC Adapter(29.4V/3A) + EUT + Mobile phone + TWS Earphone + Watch (Battery Status: <1%)	Record
Mode 2	AC/DC Adapter (29.4V/3A)+ EUT + Mobile phone + TWS Earphone + Watch (Battery Status: <50%)	Record
Mode 3	AC/DC Adapter (29.4V/3A) + EUT + Mobile phone + TWS Earphone + Watch (Battery Status: 100%)	Record
Note: All test modes were pre-tested, but we only recorded the worst case in this report.		





Field Strength at 15 cm from the edges surrounding the EUT and 15cm from the top surface of the EUT

Load mode	Frequency Range (kHz)	Field Strength	Measured Field Strength Values					50% Limits	Limits
			Test Position A	Test Position B	Test Position C	Test Position D	Test Position E		
Mode 1	110.0~205.0	uT	0.128	0.135	0.139	0.134	0.142	--	--
Mode 1	110.0~205.0	A/m	0.102	0.108	0.111	0.107	0.114	0.815	1.63
Mode 1	110.0~205.0	V/m	38.467	40.522	41.776	40.384	42.797	307.0	614.0
Mode 2	110.0~205.0	uT	0.126	0.134	0.139	0.133	0.140	--	--
Mode 2	110.0~205.0	A/m	0.101	0.107	0.111	0.107	0.112	0.815	1.63
Mode 2	110.0~205.0	V/m	37.920	40.302	41.882	40.083	42.062	307.0	614.0
Mode 3	110.0~205.0	uT	0.123	0.133	0.140	0.124	0.138	--	--
Mode 3	110.0~205.0	A/m	0.098	0.106	0.112	0.099	0.111	0.815	1.63
Mode 3	110.0~205.0	V/m	36.842	39.911	42.162	37.361	41.601	307.0	614.0

Field Strength at 20 cm from the edges surrounding the EUT and 20cm from the top surface of the EUT

Load mode	Frequency Range (kHz)	Field Strength	Measured Field Strength Values	50% Limits	Limits
			Test Position E		
Mode 1	110.0~205.0	uT	0.148	--	--
Mode 1	110.0~205.0	A/m	0.119	0.815	1.63
Mode 1	110.0~205.0	V/m	44.577	307	614
Mode 2	110.0~205.0	uT	0.148	--	--
Mode 2	110.0~205.0	A/m	0.119	0.815	1.63
Mode 2	110.0~205.0	V/m	44.544	307	614
Mode 3	110.0~205.0	uT	0.141	--	--
Mode 3	110.0~205.0	A/m	0.113	0.815	1.63
Mode 3	110.0~205.0	V/m	42.334	307	614

Note: $V/m = 10(((20 \lg(A/m \cdot 10^6) + 51.5) - 120)/20)$

Note: $A/m = uT/1.25$



9. Test Setup Photos

9.1. Test Position A - Exposure photo from side edge surface-Rear(15cm)



(TM1)

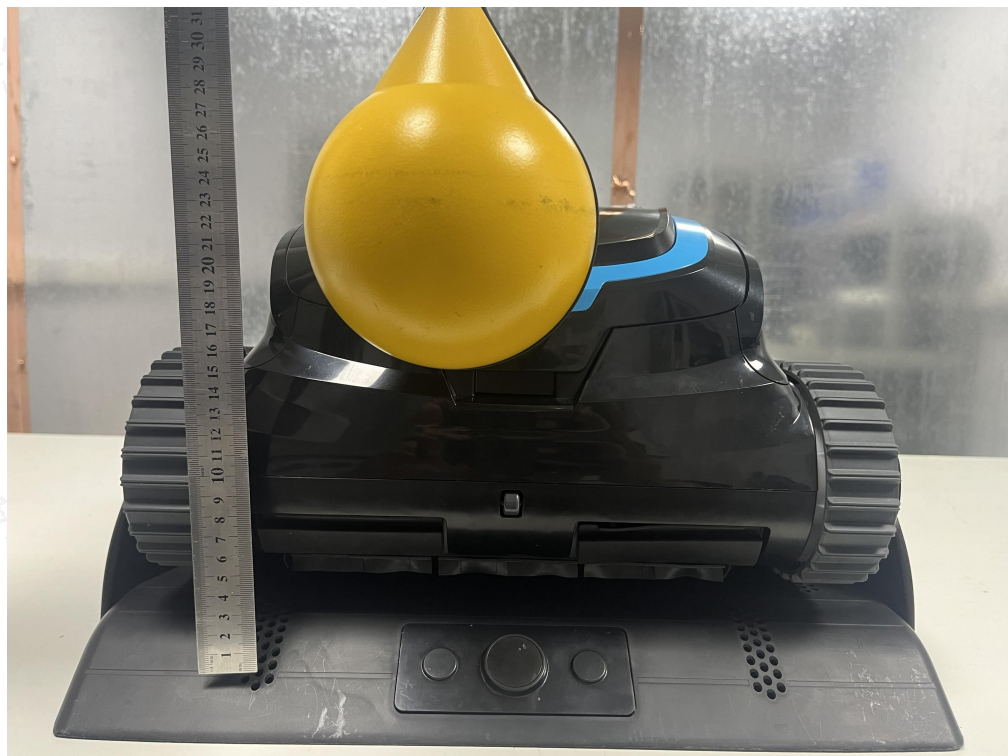
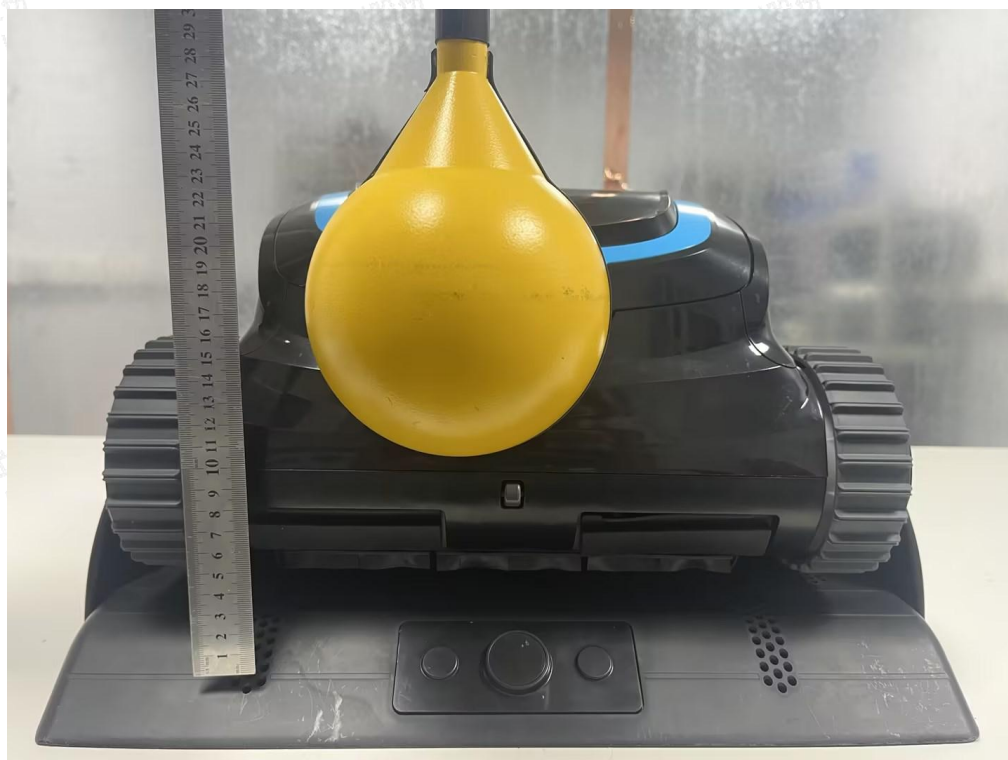
9.2. Test Position B - Exposure photo from side edge surface-Left(15cm)



(TM1)



9.3.Test Position C - Exposure photo from side edge surface-Front(15cm)**(TM1)****9.4.Test Position D - Exposure photo from side edge surface-Right(15cm)****(TM1)**

9.5.Test Position E - Exposure photo from top surface (20cm)**(TM1)****9.6.Test Position E - Exposure photo from top surface (15cm)****(TM1)**



10. Conclusion

A minimum safety distance of at 15 cm surrounding the device and 20 cm above the top surface of the device is required when the device is charging a smart phone. The detected emissions with a distance of 15 cm surrounding the device and 20 cm above the top surface of the device are below the limitations according to FCC KDB 680106 D01 Section 3. RF Exposure Requirement Clause 3.

11. Description of Test Facility

NVLAP Accreditation Code is 600167-0.

FCC Designation Number is CN5024

CAB identifier is CN0071.

CNAS Registration Number is L4595.

Test Firm Registration Number: 254912.

12. Measurement Uncertainty

Test Item	Frequency Range	Uncertainty	Note
Field Strength Uncertainty :	1Hz~400KHz	1%	(1)

(1). This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

-----THE END OF REPORT-----

