

Test Report

Report Number:

F231078E8

Equipment under Test (EUT):

KOSTAL COM2020 EMC0

Applicant:

KOSTAL Engineering CR, spol. s r.o.

Manufacturer:

KOSTAL Engineering CR, spol. s r.o.



Deutsche
Akkreditierungsstelle
D-PL-17186-01-00

References

- [1] **CFR 47 Rule part 1** Practice and Procedure
- [2] **CFR 47 Rule part 2** Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
- [3] **KDB 447498 D04 Interim General RF Exposure Guidance v01**
- [4] **ANSI C63.10: 2013** American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

Assessed and
written by:



Sebastian KREHS
20.09.2024

Signature

Reviewed and
approved by:



Bernward Rohde
20.09.2024

Signature

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1 Identification

1.1 Applicant

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Applicant represented during the test by the following person:	None

1.2 Manufacturer

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Manufacturer represented during the test by the following person:	None

1.3 Test Laboratory

The tests were carried out by: **PHOENIX TESTLAB GmbH**
Königswinkel 10
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accredited by Deutsche *Akkreditierungsstelle GmbH (DAkkS)* according to DIN EN ISO/IEC 17025:2018. The accreditation is only valid for the scope of accreditation listed in the annex of the certificate D-PL-17186-01-00.

1.4 EUT (Equipment under Test)

Test object: *	Steering column module (KOSTAL COM2020 EMC0)
Model name: *	PSA COM2020
Model number: *	10538719-07
Order number: *	9852618980
FCC ID: *	2BCB9-COM2020
IC certification number: *	31740-COM2020
PMN: *	COM2020
HVIN: *	COM2020
FVIN: *	MEV9.5
Serial number: *	93905WG400015
PCB identifier: *	12171357-01
Hardware version: *	8.5
Software version: *	9.4

* Declared by the applicant

Note: PHOENIX TESTLAB GmbH does not take samples. The samples used for tests are provided exclusively by the applicant.

1.5 Technical Data of Equipment

General EUT data			
Power supply EUT: *	DC		
Supply voltage EUT: *	U _{Nom} = 13.5 V _{DC}	U _{Min} = 8 V _{DC}	U _{Max} = 16 V _{DC}
Temperature range: *	-40 °C to +85 °C		
Lowest / highest internal clock frequency: *	125 kHz / 16 MHz		
Receiver frequency: *	433 MHz		

* Declared by the applicant

RFID part	
Operating frequency: *	125 kHz
Number of channels: *	1
Type of modulation: *	ASK
Data rate: *	N/A
Duty cycle: *	
Antenna type: *	Loop antenna
Antenna connector: *	Customized

* Declared by the applicant

2 Evaluation Method

2.1 RF exposure test exemptions for single sources

2.1.1 General Exemption CFR 47 §1.1307(b)(3)(i)(A)

The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in [paragraph \(b\)\(3\)\(ii\)\(A\)](#) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

2.1.2 SAR Based Exemption CFR 47 §1.1307(b)(3)(i)(B)

The available maximum time-averaged power of effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz inclusive.

For the following separation distances [d] and frequency ranges P_{th} is given by the following formulas

	0.5 cm ≤ d ≤ 20cm	20 cm < d ≤ 40 cm
0.2 GHz ≤ f < 1.5 GHz	$P_{th}(mW) = ERP_{20cm} \left(\frac{d}{20} \right)^x$ $ERP_{20cm} (mW) = 2040f$ $x = -\log_{10} \left(\frac{60}{ERP_{20cm} \sqrt{f}} \right)$	$P_{th}(mW) = ERP_{20cm}$ $ERP_{20cm} (mW) = 2040f$
1.5 GHz ≤ f ≤ 6 GHz	$P_{th}(mW) = ERP_{20cm} \left(\frac{d}{20} \right)^x$ $ERP_{20cm} (mW) = 3060$ $x = -\log_{10} \left(\frac{60}{ERP_{20cm} \sqrt{f}} \right)$	$P_{th}(mW) = ERP_{20cm}$ $ERP_{20cm} (mW) = 3060$

2.1.3 MPE Based Exemption CFR 47 §1.1307(b)(3)(i)(C)

By using Table 1 and the minimum separation distance (d in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, d must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP 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 (1.64 linear value).

RF Source frequency [MHz]	Threshold ERP [W]
0.3 - 1.34	1920 d ²
1.34 – 30	3450 d ² /f ²
30 – 300	3.83 d ²
300 – 1500	0.0128 d ² /f
1500 - 100000	19.2 d ²

d: Minimal separation distance from antenna to the user

2.1.4 Stand alone MPE evaluation limits

The human exposure to RF emissions from such devices could be evaluated based on the MPE limits adopted by the FCC for electric and magnetic field strength and / or power density. The limits for General Population / Uncontrolled Exposure are given in the following table from CFR 47 §1.1310(e)1:

Frequency range [MHz]	Electric field strength (E) [V/m]	Magnetic field strength (H) [A/m]	Power density (S) [mW/cm ²]	Averaging time [min]
(i)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
(ii)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 – 1500			f/1500	< 30
1500 – 100,000			1.0	< 30

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

The power density is calculated as follows:

$$S = \frac{P \cdot G \cdot D}{4 \cdot \pi \cdot d^2}$$

Where:

P: conducted power

G: Antenna gain (linear)

D: Duty Cycle

d: Minimal separation distance from antenna to the user

2.2 RF exposure test exemptions for simultaneous transmission sources

2.2.1 1 mW Test Exemption for simultaneous transmission sources

As discussed in CFR 47 §1.1307(b)(3)(ii)(A) [1] the 1 mW exemption intended for single transmitters may be also applied to simultaneous transmission conditions, within the same host device, according one of the following criteria:

- When the maximum available power each individual transmitting antenna with the same time averaging period is ≤ 1 mW, and the nearest parts of the antenna structures of the simultaneously operating transmitters are separated by at least 2 cm
- When the aggregate maximum available power of all transmitting antennas is ≤ 1 mW in the same time-averaging period

This exemption may not be combined with any other exemption.

2.2.2 Simultaneous transmission SAR based and MPE based test exemptions

Although this is not a module integration in the sense of product approval, the procedure for simultaneous transmission specified in KDB 447498 D04 Interim General RF Exposure Guidance v01 [3] in chapter 2.2 was taken into account:

According to the RF exposure KDB 447498 D04 General RF Exposure Guidance v01 [3] in chapter 2.2.2: This case is described in detail in CFR 47 §1.1307(b)(3)(ii)(B) and covers the situations where both SAR-based and MPE-based exemption may be considered for test exemption in fixed, mobile, or portable device exposure conditions. For these cases, a device with multiple RF sources transmitting simultaneously will be considered an RF exempt device if the condition of the following formula is satisfied.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure Limit_k} \leq 1$$

For these test exemptions to apply, the maximum output power, duty factor, and other applicable parameters used in the standalone ERP determination tests, must be the same, or corresponding to a more conservative choice, than those required for simultaneous transmission.

Simultaneous transmission MPE test exclusion applies when the sum of the MPE ratios for all simultaneously transmitting antennas incorporated in a host device is ≤ 1.0 , according to calculated/estimated, numerically modelled, or measured field strengths or power density. The MPE ratio of each antenna is determined at the minimum test separation distance required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to the MPE limit at the test frequency.

2.2.3 Test exemption based on the SAR to Peak Location Separation Ratio

When the ERP-based condition in the previous section does not apply, a test exemption may be still applicable based on the SAR to peak location separation ratio (SPLSR) procedure.

In this case, the simultaneously transmitting antennas in each operating mode and exposure condition combination must be considered one pair at a time to determine the SPLSR that qualifies for the additional test exemption.

This ratio is defined as:

$$SPLSR = (SAR_1 + SAR_2)^{\frac{1.5}{R_i}}$$

Where: SAR₁ and SAR₂ = highest reported SAR or estimated SAR values for the two sources in the pair i, and R_i is their distance in mm.

When SPLSR ≤ 0.0.4 (rounded to two decimal digits), for all antenna pairs in the configuration, then the device qualifies for 1 g SAR test exemption.

When 10 g SAR applies (e.g. for extremities) the corresponding test exemption condition is SPLSR ≤ 0.10.

If any antenna pair does not qualify for simultaneous transmission SAR test exemption, then the device must be tested for SAR compliance, according to the enlarged zoom scan and volume scan post-processing procedures in KDB Pub. 865664 D01.

3 Results of evaluation

3.1 Used evaluation methods

RF Exposure test exemptions for single sources			
Used	Method	See sub-clause	Comment
☒	General Exemption acc. CFR 47 §1.1307(b)(3)(i)(A)	2.1.1	-
☐	SAR Based Exemption acc. CFR 47 §1.1307(b)(3)(i)(B)	2.1.2	-
☐	MPE Based Exemption acc. CFR 47 §1.1307(b)(3)(i)(C)	2.1.3	-
☐	MPE Calculation	2.1.4	-

RF Exposure test exemptions for simultaneous transmission sources			
Used	Method	See sub-clause	Comment
☒	Not applicable		No simultaneous possible
☐	1 mW test Exemption acc. 2.2.1 [3]	2.2.1	-
☐	SAR Based Exemption acc. 2.2.2 [3]	2.2.2	
☐	MPE Based Exemption acc. 2.2.2 [3]	2.2.2	
☐	SAR to Peak location separation ratio acc. 2.2.3 [3]	2.2.3	

3.2 Evaluation Distance

No evaluation distance is given by the manufacturer / applicant. According to the CFR 47 §2.1091 the device as declared by the applicant is a fixed device.

3.3 RFID Emissions

The following information are based on Test-Report F231078E5 of PHOENIX TESTLAB GmbH.

General exemption CFR 47 §1.1307(b)(3)(i)(A)

The radiated field strength of the transmitter was measured at a distance of 3 m. The measured field strength at 3 m (= Reading @3m distance + Antenna factor) was 71.4 dBμV/m. This value is converted into an EIRP power with formula according to ANSI C63-10 clause 9.5:

$$EIRP = E_{Meas} + 20 \log(d_{Meas}) - 104.7$$

Where

EIRP is the equivalent isotropically radiated power
 E_{Meas} is the field strength of the emission at the measurement distance, in dBμV/m
 d_{Meas} is the measurement distance, in m

$$EIRP = 71.4 \text{ dB}\mu\text{V/m} + 20 \log(3\text{m}) - 104.7 = -23.8 \text{ dBm}$$

This value is converted into an ERP power with formula according to ANSI C63-10 clause G.5:

$$ERP = EIRP - 2.15 = -25.95 \text{ dBm}$$

The ERP power of the transmitter is -23.95 dBm or 2.5 μW. This is below the 1 mW limit.

4 Conclusion

The COM2020 is exempted from RF exposure testing according to CFR 47 §1.1307(b)(3)(i)(A).

5 Report History

Report Number	Date	Comment
F231078E8	20.09.2024	Initial Test Report
-	-	-
-	-	-