

**Technical memorandum
CFR 47, FCC Part 15, Subpart C and ISED
Intentional Radiators**

Report Number: 125-25804-11

Date of issue: 2026-06-12

Total number of pages.....: 8

**Name of Testing Laboratory
preparing the Memorandum.....**: FORCE Technology
Venlighedsvej 4
2970 Hørsholm
DENMARK

Applicant's name: Vitrolife A/S
Address: Jens Juuls Vej 20
8260 Viby J
Denmark

Specification:: KDB 447498 (General RF Exposure Guidance v06)
TRF template used:: N/A
Standards: 47 CFR Part 2, Subpart J (Specific rule part § 2.1093)
Test procedure: -

Test Report Form No.: -
Test Report Form(s) Originator: -
Master TRF: -

Personnel.....: Jan Askov, Senior Specialist

Test item description	Tagging system
Trademark or brand name.....	
Manufacturer.....	Vitrolife A/S
Model/Type reference(s)	eWitness
FCC ID	2BO96EW0140100202
ISED ID	-
Ratings	12 VDC - 100-240 VAC / 50/60 Hz from AC/DC adaptor – 60 W

Possible test case verdicts:	
- test case does not apply to the test item .:	N/A (Not Applicable)
- test item does meet the requirement	P (Pass)
- test item does not meet the requirement .:	F (Fail)
Date of receipt of test item	2025-05-01
Date (s) of performance of tests	2025-05-06 to 2025-06-10
General product information (GPI) and other remarks: A RFID System, the eWitness is a safety mechanism used to prevent mix-ups of gametes and embryos, ensuring correct identification and tracking throughout the IVF process. The two antennas are not transmitting simultaneously. The system employs internal multiplexing, ensuring that only one antenna is active in transmit mode at any given time.	

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1 General description of test item

See FORCE Technology report no. 125-25804-1

2 Verdict summary section

USA: 47 CFR Part 2, Subpart J (Specific rule part § 2.1093)				
Test Clause	Requirement – Test case	FCC rule part	Test methods	Results
4.3.1 c) 2)	SAR Test Exclusion	47 CFR Part 2, Subpart J Specific rule part § 2.1093	KDB 447498	P
Supplementary information: For 10-g extremity SAR and conducted power values are derived from FORCE Technology report no. 125-25804-1				

3 Measurement of zero span

Name	Jan Askov
Date	2025-06-03
Rationale for verdict N/A	--

Test location (stand)	Hørsholm EMCRUM4 and SRD setup
Applied limit	☐ 6 dB bandwidth
	☐ 20 dB bandwidth according to 47 CFR Part 15.215(c)
	☐ 26 dB bandwidth
	☐ 99 % emission bandwidth according to 47 CFR Part 15.215(c)
	☒ Duty cycle measurement
Test setup description	☐ Relative Loop antenna measurement, distance < 10 cm.
	☒ Other: Antenna connector measurement
Supplementary test setup description	A spectrum analyzer was used for the measurements, the video bandwidth was set to a value at least three times greater than the IF bandwidth of the measuring instrument to avoid the introduction of unwanted amplitude smoothing. Video filtering is not used during occupied bandwidth tests.
Test method applied	☐ 6.9.2 Occupied bandwidth—relative measurement procedure
	☐ 6.9.3 Occupied bandwidth—power bandwidth (99 %) measurement procedure
	☒ Other: Zero Span measurements
Supplementary information	--

Photo.	Measurement of Zero Span
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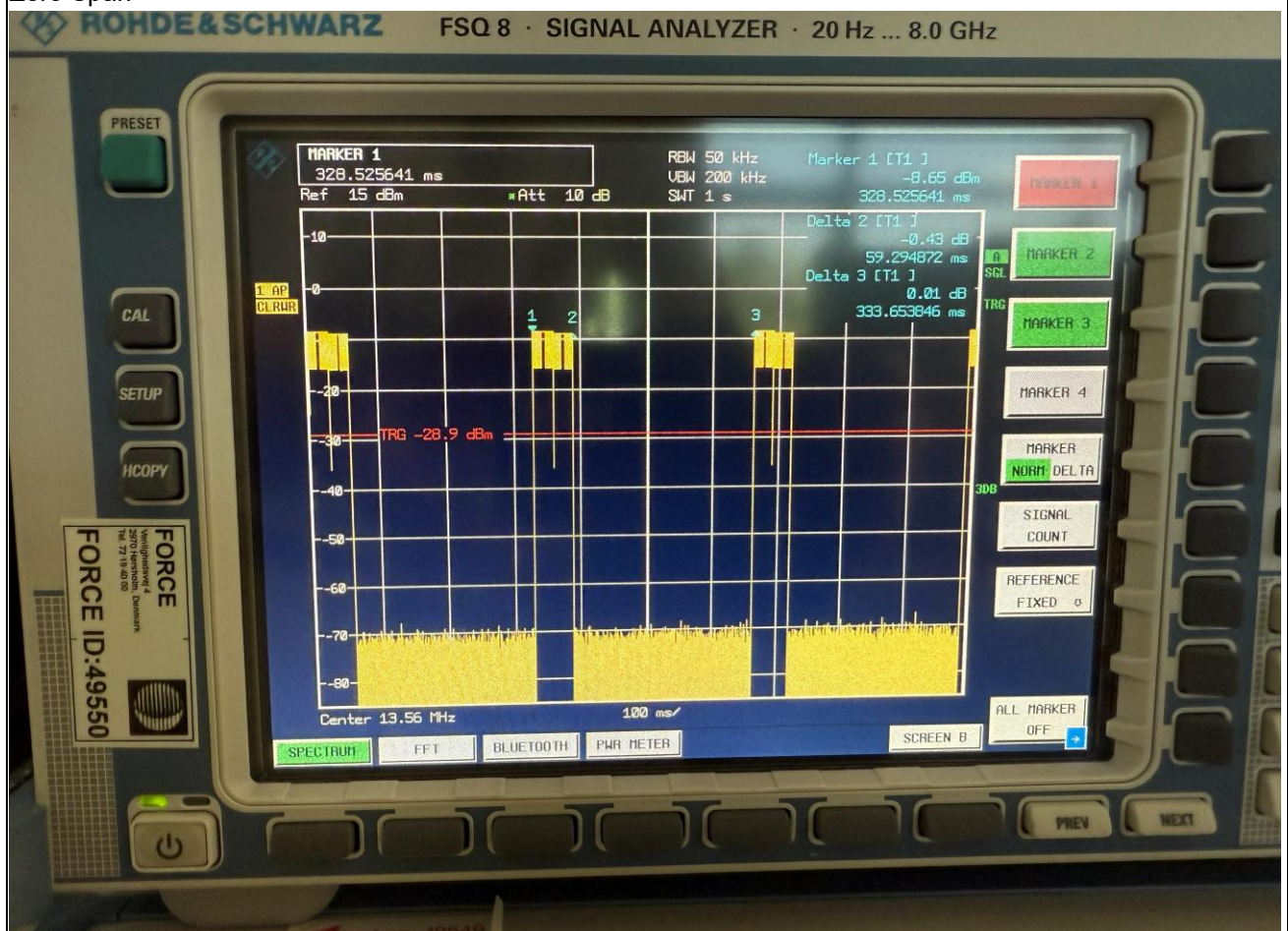


Tabulated Results summary

Operating frequency [MHz] Note 1	On time [ms]	Cycle time [ms]	Duty Cycle (DC) [%]
13.560587	59.29	333.65	17.77

Graphical representation

Zero Span



Note 1: Relative measurement – normal operation

4 Test results for maximum time average conducted output power

Tabulated Results summary

Operating frequency [MHz] Note 1	Power (99 % BW) [dBm] / [mW] Note 1	On time [ms]	Cycle time [ms]	Duty Cycle (DC) [%]	Time average conducted output power [mW] Note 2	Limit [mW] Note 4	Factor 'Time average conducted output power' / 'Limit'	Remarks
13.560587	32.63 / 1.832	59.29	333.65	17.77	325.6 (355 – Note 3)	1108	0.29 (0.32 – Note 3)	Passed

Note 1: Conducted power values are derived from FORCE Technology report no. 125-25804-1
 Note 2: Time average conducted output power is Duty Cycle [%] * Power (99 % BW) [mW]
 Note 3: Including tune-up tolerance (9%)
 Note 4: Power threshold according to KDB 447498 §4.3.1 c) 2) for 10-g extremity SAR