



# element

**Fortell Research Inc.**

**Fortell AI Hearing Aid, Right**

**FCC 2.1093:2025**

**Bluetooth Low Energy**

**Report: CHRM0004.5, Issue Date: October 14, 2025**



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# CERTIFICATE OF EVALUATION

Last Date of Evaluation: October 14, 2025

Fortell Research Inc.

EUT: Fortell AI Hearing Aid, Right

## RF Exposure Evaluation

### Standards

| Specification   | Method                                          |
|-----------------|-------------------------------------------------|
| FCC 2.1093:2025 | FCC 447498 D01 General RF Exposure Guidance v06 |

### Results

| Method Clause | Description        | Applied | Results   | Comments |
|---------------|--------------------|---------|-----------|----------|
| 4.3.1         | SAR Test Exclusion | Yes     | Compliant | None     |

Compliance distance: 5 mm

### Deviations From Evaluation Standards

None

### Approved By:



Donald Facteau, Process Architect

*Product compliance is the responsibility of the client; therefore, the tests and equipment modes of operation represented in this report were agreed upon by the client, prior to testing. The results of this test pertain only to the sample(s) tested. The specific description is noted in each of the individual sections of the test report supporting this certificate of test. This report reflects only those tests from the referenced standards shown in the certificate of test. It does not include inspection or verification of labels, identification, marking or user information. As indicated in the Statement of Work sent with the quotation, Element's standard process is to always use the latest published version of the test methods even when earlier versions are cited in the test specification. Issuance of a purchase order was de facto acceptance of this approach. Otherwise, the client would have advised Element in writing of the specific version of the test methods they wanted applied to the subject testing*

# REVISION HISTORY



| Revision Number |      | Description | Date (yyyy-mm-dd) | Page Number |
|-----------------|------|-------------|-------------------|-------------|
| 00              | None |             |                   |             |

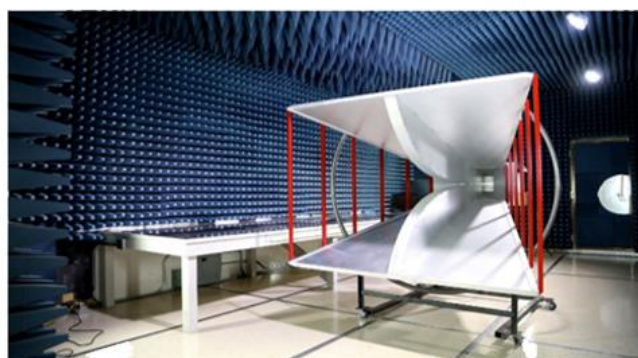
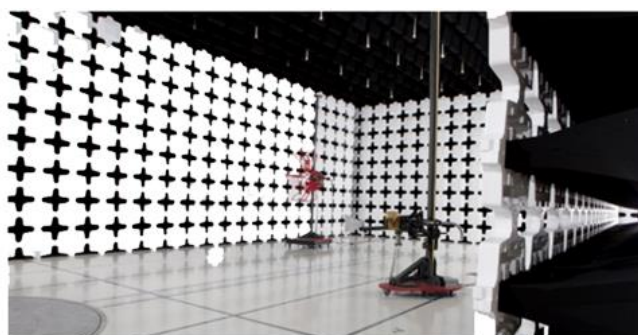
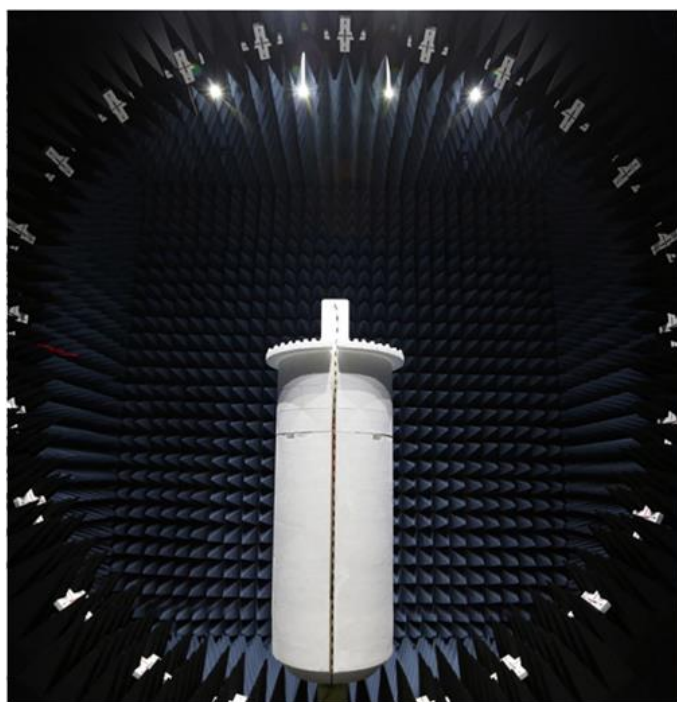
# FACILITIES

Testing was performed at the following location(s)

|                                     | Location   | Labs <sup>(1)</sup> | Address                                                              | A2LA <sup>(2)</sup> | ISED <sup>(3)</sup> | BSMI <sup>(4)</sup> | VCCI <sup>(5)</sup> | CAB    | FDA <sup>(6)</sup> |
|-------------------------------------|------------|---------------------|----------------------------------------------------------------------|---------------------|---------------------|---------------------|---------------------|--------|--------------------|
| <input type="checkbox"/>            | California | OC01-17             | 41 Tesla<br>Irvine, CA 92618<br>(949) 861-8918                       | 3310.04             | 2834B               | SL2-IN-E-1154R      | A-0029              | US0158 | TL-55              |
| <input checked="" type="checkbox"/> | Minnesota  | MN01-11             | 9349 W Broadway Ave.<br>Brooklyn Park, MN 55445<br>(612) 638-5136    | 3310.05             | 2834E               | SL2-IN-E-1152R      | A-0109              | US0175 | TL-57              |
| <input type="checkbox"/>            | Oregon     | EV01-12             | 6775 NE Evergreen Pkwy #400<br>Hillsboro, OR 97124<br>(503) 844-4066 | 3310.02             | 2834D               | SL2-IN-E-1017       | A-0108              | US0017 | TL-56              |
| <input type="checkbox"/>            | Washington | NC01-05             | 19201 120th Ave NE<br>Bothell, WA 98011<br>(425) 984-6600            | 3310.06             | 2834F               | SL2-IN-E-1153R      | A-0110              | US0157 | TL-67              |
| <input type="checkbox"/>            | Offsite    | N/A                 | See Product Description                                              | N/A                 | N/A                 | N/A                 | N/A                 | N/A    | N/A                |

See data sheets for specific labs

- (1) The lab designations denote individual rooms within each location. (OC01, OC02, OC03, etc.)
- (2) A2LA Certificate No.
- (3) ISED Company No.
- (4) BSMI No.
- (5) VCCI Site Filing No.
- (6) FDA ASCA No.



# PRODUCT DESCRIPTION



## Client and Equipment Under Evaluation Information

|                                 |                               |
|---------------------------------|-------------------------------|
| <b>Company Name:</b>            | Fortell Research Inc.         |
| <b>Address:</b>                 | 379 W Broadway                |
| <b>City, State, Zip:</b>        | New York City, NY 10012       |
| <b>Evaluation Requested By:</b> | John Becker                   |
| <b>EUT:</b>                     | Fortell AI Hearing Aid, Right |
| <b>Date of Evaluation:</b>      | 10/14/2025                    |

## Information Provided by the Party Requesting the Evaluation

|                                                                                          |
|------------------------------------------------------------------------------------------|
| <b>Functional Description of the Equipment:</b>                                          |
| Right Hearing aid with BTLE                                                              |
| <b>Objective:</b>                                                                        |
| To demonstrate compliance with FCC RF exposure requirements for 2.1093 portable devices. |

# RF EXPOSURE CONDITION



| The following RF Exposure conditions were used for the assessment documented in this report: |                                                                            |
|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Intended Use                                                                                 | Portable                                                                   |
| Location on Body (if applicable)                                                             | Head/Torso                                                                 |
| How is the Device Used                                                                       | Hearing aid is worn on the ear at a distance less than 20 cm from the user |
| Radios Contained in the Same Host Device                                                     | Bluetooth Low Energy                                                       |
| Simultaneous Transmitting Radios                                                             | None                                                                       |
| Body Worn Accessories                                                                        | n/a                                                                        |
| Environment                                                                                  | General Population/Uncontrolled Exposure                                   |

# SAR TEST EXCLUSION

## OVERVIEW

Human exposure to RF emissions from portable devices (47 CFR §2.1093) used with the radiating antenna closer than 20 cm to the user requires Specific Absorption Rate (SAR) to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation.

## COMPLIANCE WITH FCC REQUIREMENTS IN 47 CFR §2.1093

The EUT will be used with a separation distance of less than 20 centimeters between the radiating antenna and the body of the user or nearby persons and must therefore be considered a portable transmitter per 47 CFR 2.1093(b).

### 47 CFR §2.1093

*“(b) For purposes of this section, the definitions in §1.1307(b)(2) of this chapter shall apply. A portable device is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that the RF source's radiating structure(s) is/are within 20 centimeters of the body of the user.”*

## COMPLIANCE WITH FCC KDB 447498 D01 GENERAL RF EXPOSURE GUIDANCE V06

“KDB 447498 D01 General RF Exposure Guidance v06” provides the procedures, requirements, and authorization policies for mobile and portable devices.

Standalone radio SAR test exclusion is covered under section 4.3.1. Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Thresholds are met as shown in the Limits section below.

Simultaneous transmission SAR test exclusion is covered under section 4.3.2. SAR test exclusion is determined for each operating configuration and exposure condition according to the reported standalone SAR of each applicable simultaneously transmitting antenna. When the sum of 1-g or 10-g SAR of all simultaneously transmitting antennas in an operating mode and exposure condition combination is within the SAR limit, SAR test exclusion applies to that simultaneous transmission configuration.

# SAR TEST EXCLUSION

## LIMITS

### Limits for General Population /Uncontrolled Exposure: 47 CFR §1.1310 (c)

The SAR limits for general population/uncontrolled exposure are 0.08 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 1.6 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit is 4 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 30 minutes to determine compliance with general population/uncontrolled SAR limits.

For 100 kHz to 6 GHz and test separation distances  $\leq 50$  mm, the SAR test exclusion thresholds are 1-g for head and body SAR and 10-g SAR for extremity SAR.

## ASSESSMENT (KDB 447498 D01 GENERAL RF EXPOSURE GUIDANCE V06)

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:

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

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
- 3.0 and 7.5 are referred to as the numeric thresholds

The test exclusions are applicable only when the minimum test separation distance is  $\leq 50$  mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm according to 4.1f) is applied to determine SAR test exclusion.

## ASSESSMENT

By operating below the SAR Test Exclusion Threshold, the standalone radio is compliant with the requirements of 47 CFR §1.1310. If applicable, collocated radios are further assessed later in this document. The SAR Test Exclusion Threshold is summarized in the following table:

| Radio                | Frequency Range (MHz) | Conducted Output Power | Power Tolerance (dB) | Duty Cycle | Antenna Assembly Gain (dBi) | Minimum Separation Distance (mm) | Exclusion Threshold | Limit | Compliant |
|----------------------|-----------------------|------------------------|----------------------|------------|-----------------------------|----------------------------------|---------------------|-------|-----------|
| Bluetooth Low Energy | 2400-2483.5           | 5.45 dBm               | 2.0                  | 100.0%     | -4.54                       | 5                                | 1.8                 | 3.0   | yes       |

The information in the table above was obtained from:

The rated value was used in these calculations. From Element Report No. CHRM0004.1 Rev. 1 and customer supplied information

Evaluator: Nolan De Ramos

End of Test Report