



MAX Testing Co.,Ltd.

Report No.: MAX26040104P01-R01RF

RF TEST REPORT

Report Reference No..... : MAX26040104P01-R01RF

FCC ID..... : 2BV6V-TRUP0100

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Address..... : 1/F, Building B, Xinshidai GR Park,Shiyan Street, Bao'an District,
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Applicant's name..... : Tru Count Inc.

Address..... : 1449 S Michigan Ave STE 13315 Chicago, IL 60605

Test specification..... :

Standard..... : KDB 447498 D01 General RF Exposure Guidance v06

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Test item description..... : Tru Pebble step-tracker

Trade Mark..... : TRU

Manufacturer..... : U-C Group Limited

Model/Type reference..... : TRU-P0100

Listed Models : /

Modulation : GFSK

Frequency..... : From 2402MHz to 2480MHz

Rating..... : DC 3.7V From Battery or DC 5V by USB port

Result..... : PASS

RF EXPOSURE EVALUATION METHOD

According to KDB 447498 D01 General RF Exposure Guidance v06, 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 Threshold condition(s), listed below, is (are) satisfied.

For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f_{(\text{GHz})}}] \leq 3.0$ for 1-g SAR, and ≤ 7.5 for 10-g extremity SAR, 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

According to FCC 1.1310: The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency(RF) Radiation as specified in §1.1307(b)

EUT Specification

Frequency band (Operating)	☐ WLAN: 2.412GHz ~ 2.462GHz ☐ WLAN: 5.150GHz ~ 5.250GHz ☐ WLAN: 5.725GHz ~ 5.850GHz ☒ Others BT:2402-2480MHz
Device category	☒ Portable (<20cm separation) ☐ Mobile (>20cm separation) ☐ Others
Exposure classification	☒ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR
Antenna diversity	☒ Single antenna ☐ Multiple antennas ☐ Tx diversity ☐ Rx diversity ☐ Tx/Rx diversity
Max. output power	3.72 dBm (0.00236W)
Antenna gain (Max)	0.50dBi
Evaluation applied	☐ MPE Evaluation ☒ SAR Evaluation

RF EXPOSURE EVALUATION METHOD

SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and ≤ 50 mm

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table.

MHz	5	10	15	20	25	mm
150	39	77	116	155	194	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	
450	22	45	67	89	112	
835	16	33	49	66	82	
900	16	32	47	63	79	
1500	12	24	37	49	61	
1900	11	22	33	44	54	
2450	10	19	29	38	48	
3600	8	16	24	32	40	
5200	7	13	20	26	33	
5400	6	13	19	26	32	
5800	6	12	19	25	31	

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, 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

The test exclusions are applicable only when the minimum test separation distance is ≤ 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 is applied to determine SAR test exclusion.

Maximum measured transmitter power.

BLE

Operating Mode	Frequency	Measured Power	max. power	Antenna Gain	min. test separation distance	$[\sqrt{f}(\text{GHz})]$	Result	Limit
	(MHz)	(dBm)	(mW)	(dBi)	(mm)			
GFSK	2402	3.72	2.36	0	5	1.550	0.7300	3
	2440	3.05	2.02	0	5	1.562	0.6306	3
	2480	3.08	2.03	0	5	1.575	0.6401	3

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f}(\text{GHz})]$$

The test Result is less than 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR.

Conclusion: No SAR is required.