

Certification Exhibit

RF Exposure:

FCC 47 CFR Part 2.1091

Rimage Corporation
RAS39

FCC ID: QT5-RFID4
IC: 4496A-RFID4

Prepared for: Rimage Corporation
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COMMERCIAL-IN-CONFIDENCE

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SIGNATURE

A handwritten signature in black ink, appearing to read "Yves-Thierry Jean-Charles".

NAME	JOB TITLE	RESPONSIBLE FOR	ISSUE DATE
Yves-Thierry Jean-Charles	Senior Engineer	Authorized Signatory	11 July 2026

Signatures in this approval box have checked this document in line with the requirements of TÜV SÜD America, Inc. document control rules.

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1 Report Summary

1.1 Document Modification Record

Alterations and Additions of this document will be issued to the holders of each copy in the form of a complete document.

Issue	Description of Change	Date of Issue
1	First Issue	2026-July-11

1.2 Purpose

The purpose of the document is to report the RF exposure evaluation of the RAS39 in accordance with FCC 47 CFR Part 2.1091.

1.3 General Information

Applicant: Rimage Corporation
Device Category: Mobile
Environment: General Population/Uncontrolled Exposure
Test Specification/Issue/Date: US Code of Federal Regulations (CFR): Title 47, Part 1, Subpart I: Procedures Implementing the National Environmental Policy Act of 1969, 2025.
US Code of Federal Regulations (CFR): Title 47, Part 2, Subpart J: Equipment Authorization Procedures, 2025.

1.4 Device under Test (DUT) Description

The RAS39 is an automated USB recording and publishing system. The EUT incorporates a 13.56 MHz RFID transceiver based on the STMicroelectronics ST25R3917B IC and a Taoglas FXR.1515.A.DG loop antenna for identification and tracking of consumables using the ISO/IEC 15693 protocol.

The EUT contains a previously approved RFID subsystem, Model CDPR6 (FCC ID: QT5-CDPR6). The two radios are not capable of simultaneous transmission.



1.5 Technical Information

FCC ID:	QT5-RFID4
ISED Certification Number:	4496A-RFID4
Transmission Protocol:	13.56 MHz RFID
Frequency:	13.56 MHz
Antenna Type:	Flexible PCB loop Antenna
Antenna Gain:	----- dBi
Maximum Field Strength:	26.98 dBuV/m
Measurement Distance:	3 m
Exposure Conditions:	≥ 200 mm



2 Evaluation Details

2.1 Specific Requirements

FCC 47 CFR Part 1.1307 Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared.

1.1307 (b)(3) Determination of exemption.

(i) For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2) of this section): A single RF source is exempt if:

(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);

(B) Or the available maximum time-averaged power or 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 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by:

$$P_{th} = \begin{cases} ERP_{20\text{ cm}} \left(\frac{d}{20\text{ cm}} \right)^x & d \leq 20\text{ cm} \\ ERP_{20\text{ cm}} & 20\text{ cm} < d \leq 40\text{ cm} \end{cases}$$

Where

$$x = -\log_{10} \left(\frac{60}{ERP_{20\text{ cm}} \sqrt{f}} \right) \quad \text{and } f \text{ is in GHz;}$$

And

$$ERP_{20\text{ cm}} (\text{mw}) = \begin{cases} 2040f & 0.3\text{ GHz} \leq f < 1.5\text{ GHz} \\ 3060 & 1.5\text{ GHz} \leq f < 6\text{ GHz} \end{cases}$$

$d = \text{the separation distance (cm)}$

(C) Or using Table 1 and the minimum separation distance (R 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, R 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).

Table 1 to § 1.1307(b)(3)(i)(C)—Single RF Sources Subject to Routine Environmental Evaluation

RF Source frequency (MHz)	Threshold ERP (watts)
0.3-1.34	1,920 R ² .
1.34-30	3,450 R ² /f ² .
30-300	3.83 R ² .
300-1,500	0.0128 R ² f.
1,500-100,000	19.2R ² .

2.2 RF Exposure Assessment

RAS39 RFID

Minimum Test Separation Distance: 20.0 cm
 Highest Operating Frequency: 13.56 MHz
 Antenna Type: Flexible PCB Loop Antenna
 Antenna Gain: N/A
 Antenna Dimensions: 15 mm x 15 mm x 0.27 mm
 Maximum Transmitter Field Strength: 26.98 dBuV/m
 Field Strength Test Distance: 3.0 m
 Maximum RF Conducted Power: N/A
 Maximum RF Conducted Power: N/A
 Maximum Transmitter EIRP: -68.24879 dBm
 Maximum Transmitter EIRP: 0.00000015 mW
 Exposure Condition: Body

Determination of Exemption:

47 CFR 1.1307(b)(3)(i)(A)

Exclusion Threshold: **1.0 mW**
 Exemption: **YES**

Note: The maximum EIRP and RF conducted power were calculated from the measured Field Strength in dBuV/m at a distance of 3 m.

**CDPR6 Printer RFID**

Minimum Test Separation Distance:	20.0 cm
Highest Operating Frequency:	13.56 MHz
Antenna Type:	Rectangular spiral PCB trace
Antenna Gain:	N/A
Antenna Dimensions:	38.1 mm × 53.34 mm
Maximum Transmitter Field Strength:	43.0 dBuV/m
Field Strength Test Distance:	3.0 m
Maximum RF Conducted Power:	N/A
Maximum RF Conducted Power:	N/A
Maximum Transmitter EIRP:	-52.22879 dBm
Maximum Transmitter EIRP:	0.000005986 mW
Exposure Condition	Body

Determination of Exemption:**47 CFR 1.1307(b)(3)(i)(A)**

Exclusion Threshold:	1.0 mW
Exemption:	YES

Note: The maximum EIRP and RF conducted power were calculated from the measured Field Strength in dBuV/m at a distance of 3 m.

The field strength level used for the calculations were obtained from the original certification test report of the printer.

3 Conclusion

Exemption from Routine Environmental Evaluation applies. The EUT meets the RF exposure requirements of the standards listed above.