

### 1 Cover Page

## RF Exposure Evaluation Report

**Application No.:** SHCR2303000424HS  
**FCC ID:** 2BA2LG7  
**IC:** 30328-G7  
**Applicant:** MGI Golf Inc  
**Address of Applicant:** 6825 Speedway Blvd Suite #B101B Las Vegas, NEVADA 89115, United States  
**Manufacturer:** CADDIESTER GOLF BUGGY TECHNOLOGY LTD  
**Address of Manufacturer:** NO.16-8 TONGZI RIVER WEST ROAD, ZHONGLOU DEVELOPMENT DIST, CHANGZHOU, CHINA  
**Factory:** CADDIESTER GOLF BUGGY TECHNOLOGY LTD  
**Address of Factory:** NO.16-8 TONGZI RIVER WEST ROAD, ZHONGLOU DEVELOPMENT DIST, CHANGZHOU, CHINA  
**Equipment Under Test (EUT):**  
**EUT Name:** Golf Trolley  
**Model No.:** NAVIGATOR Ai  
**Trade Mark:** MGI  
**Standard(s) :** FCC Rules 47 CFR §2.1093  
 KDB 447498 D04 interim General RF Exposure Guidance v01  
 RSS-102 Issue 5 Amendment 1 (February 2, 2021)  
**Date of Receipt:** 2023-03-02  
**Date of Test:** 2023-03-17 to 2023-04-18  
**Date of Issue:** 2023-06-06

<b>Test Result:</b>	<b>Pass*</b>
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\* In the configuration tested, the EUT complied with the standards specified above.

Parlam Zhan

Parlam Zhan  
Laboratory Manager



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Revision Record			
Version	Description	Date	Remark
00	Original	2023-06-06	/

Authorized for issue by:			
		Wade Zhang	
		Wade Zhang/Project Engineer	
		Parlam Zhan	
		Parlam Zhan / Reviewer	



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### 3 General Information

#### 3.1 General Description of E.U.T.

Power supply:	DC 28.8V 13Ah 380Wh Rechargeable Li-ion Battery Charging Adapter Model: LC-2323 Input: AC 100-240V 50/60Hz 85W Output: DC 28.8V 2A
S/N:	UAINV1225233178
Firmware Version:	Release_QFIL_WL_1.43.2_1.2.22
Product Type:	<input checked="" type="checkbox"/> Portable device <input type="checkbox"/> Mobile device <input type="checkbox"/> Fixed device

#### 3.2 Technical Specifications

##### BT

Operation Frequency:	2402MHz to 2480MHz
Modulation Type:	GFSK, pi/4DQPSK, 8DPSK
Number of Channels:	79
Channel Spacing:	1MHz
Spectrum Spread Technology:	Frequency Hopping Spread Spectrum(FHSS)
Antenna Type:	FPC Antenna
Antenna Gain:	2.2 dBi (Provided by manufacturer)

##### BLE 4.0 (For SC20-WL module)

Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	V4.0 LE
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Antenna Type:	FPC Antenna
Antenna Gain:	2.2 dBi (Provided by manufacturer)

##### BLE 5.0 (For nRF52811 module)

Operation Frequency:	2402MHz to 2480MHz
Bluetooth Version:	V5.0 LE
Modulation Type:	GFSK
Number of Channels:	40
Channel Spacing:	2MHz
Antenna Type:	PCB Antenna
Antenna Gain:	-3.86dBi (Provided by manufacturer)

##### 2.4GHz Wi-Fi

Operation Frequency:	802.11b/g/n(HT20): 2412MHz to 2462MHz;802.11n(HT40): 2422MHz to 2452MHz
Modulation Type:	802.11b: DSSS (CCK, DQPSK, DBPSK);802.11g/n: OFDM (64QAM, 16QAM, QPSK, BPSK)



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Number of Channels:	802.11b/g/n(HT20):11;802.11n(HT40):7
Channel Spacing:	5MHz
Antenna Type:	FPC Antenna
Antenna Gain:	2.2 dBi (Provided by manufacturer)
Date Rate:	802.11b:1/2/5.5./11Mbps 802.11g:6/9/12/18/24/36/48/54Mbps 802.11n:MCS0-MCS7

### 5GHz WiFi

Operation Frequency/Number of channels (20MHz):	U-NII-1: 5180-5240MHz (4 Channels); U-NII-2A: 5260-5320MHz (4 Channels); U-NII-2C: 5500-5700MHz (11 Channels); U-NII-3: 5745-5825MHz (5 Channels)
Operation Frequency/Number of channels/(40MHz):	U-NII-1: 5190-5230MHz (2 Channels); U-NII-2A: 5270-5310MHz (2 Channels); U-NII-2C: 5510-5670MHz (5 Channels); U-NII-3: 5755-5795MHz (2 Channels)
Modulation Type:	802.11a: OFDM (64QAM, 16QAM, QPSK, BPSK); 802.11n: OFDM (BPSK, QPSK, 16QAM, 64QAM)
Channel Spacing:	802.11a/n(HT20): 20MHz; 802.11n(HT40): 40MHz
DFS Function:	Slave without Radar detection
TPC Function:	Without TPC function
Antenna Type:	FPC Antenna
Antenna Gain:	3.8 dBi (Provided by manufacturer)
Date Rate:	802.11a:6/9/12/18/24/36/48/54Mbps 802.11n:MCS0-MCS7



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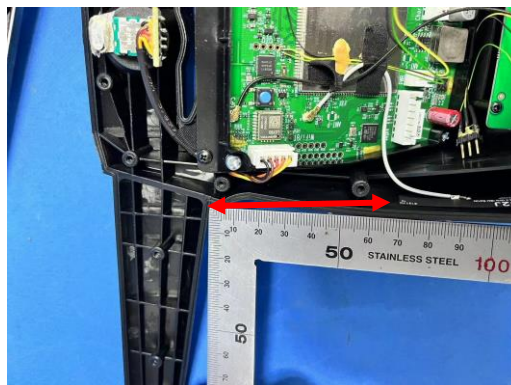
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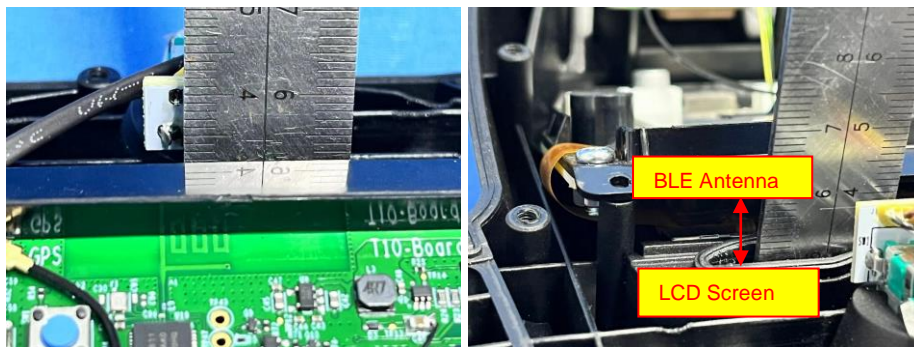


### 3.3 Separation Distance

Separation distance between the antenna to person (R):	7cm (SC20-WL WIFI&BT Antenna) 1cm (NRF52811 BLE Antenna)
Remark: This minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander.	



The WIFI Antenna to Handle(Where the hand holds) Distance



The NRF52811 BLE Antenna to LCD screen Distance (1cm)



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### 3.4 Test Location

All tests were performed at:

SGS-CSTC Standards Technical Services Co., Ltd. Shanghai Branch

588 West Jindu Road, Xinqiao, Songjiang, 201612 Shanghai, China.

Tel: +86 21 6191 5666

Fax: +86 21 6191 5678

No tests were sub-contracted.

Note:

1. SGS is not responsible for wrong test results due to incorrect information (e.g. max. clock frequency, highest internal frequency, antenna gain, cable loss, etc ) is provided by the applicant. (if applicable).

2. SGS is not responsible for the authenticity, integrity and the validity of the conclusion based on results of the data provided by applicant. (if applicable).

### 3.5 Test Facility

The test facility is recognized, certified, or accredited by the following organizations:

• **A2LA (Certificate No. 6332.01)**

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. is accredited by the American Association for Laboratory Accreditation(A2LA).

• **FCC (Designation Number: CN1301)**

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. has been recognized as an accredited testing laboratory.

• **ISED (CAB Identifier: CN0020)**

SGS-CSTC Standards Technical Services (Shanghai) Co., Ltd. EMC Laboratory has been recognized by Innovation, Science and Economic Development Canada (ISED) as an accredited testing laboratory  
Company Number: 8617A

• **VCCI (Member No.: 3061)**

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## 4 Test Standards and Limits

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.

### 4.1 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of §1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance.

The 1-mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph §1.1307(b)(3)(ii)(A).

The 1-mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

### 4.2 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

**Table B.1—Thresholds For Single RF Sources Subject to Routine Environmental Evaluation**

RF Source Frequency			Minimum Distance			Threshold ERP
$f_L$ MHz		$f_H$ MHz	$\lambda_L / 2\pi$		$\lambda_H / 2\pi$	W
0.3	—	1.34	159 m	—	35.6 m	1,920 R <sup>2</sup>
1.34	—	30	35.6 m	—	1.6 m	3,450 R <sup>2</sup> /f <sup>2</sup>
30	—	300	1.6 m	—	159 mm	3.83 R <sup>2</sup>
300	—	1,500	159 mm	—	31.8 mm	0.0128 R <sup>2</sup> f
1,500	—	100,000	31.8 mm	—	0.5 mm	19.2R <sup>2</sup>

Subscripts L and H are low and high;  $\lambda$  is wavelength.  
From §1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least  $\lambda/2\pi$ . The thresholds are based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of §1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in §1.1310 is necessary if



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the ERP of the device is greater than  $ERP_{20cm}$  in Formula (B.1) [repeated from §2.1091(c)(1); also in §1.1307(b)(1)(i)(B)].

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases} \quad (\text{B. 1})$$

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only 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.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

Limit calculation			
Frequency range	Frequency(MHz)	$R(\lambda/2\pi)(m)$	Threshold ERP(W)
300~1500MHz	<b>915</b>	0.0522	0.032
1500~100000MHz	<b>2462</b>	0.0194	0.007

### 4.3 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of  $\lambda/4$ .

As for devices with antennas of length greater than  $\lambda/4$  where the gain is not well defined, but always less than that of a half-wave dipole (length  $\lambda/2$ ), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold  $P_{th}$  (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive).  $P_{th}$  is given by Formula (B.2).

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}}(d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B. 2})$$



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where

$$x = -\log_{10} \left( \frac{60}{ERP_{20\text{cm}} \sqrt{f}} \right)$$

and  $f$  is in GHz,  $d$  is the separation distance (cm), and  $ERP_{20\text{cm}}$  is per Formula (B.1).

Example values shown in Table B.2 are for illustration only.

**Table B.2—Example Power Thresholds (mW)**

Frequency (MHz)	Distance(mm)									
	5	10	15	20	25	30	35	40	45	50
300	39	65	88	110	129	148	166	184	201	217
450	22	44	67	89	112	135	158	180	203	226
835	9	25	44	66	90	116	145	175	207	240
1900	3	12	26	44	66	92	122	157	195	236
2450	3	10	22	38	59	83	111	143	179	219
3600	2	8	18	32	49	71	96	125	158	195
5800	1	6	14	25	40	58	80	106	136	169

Limit calculation				
Frequency range(GHz)	Frequency(GHz)	X	Distance(cm)	Pth (mW)
0.3~1.5	<b>0.915</b>	1.474	<b>0.5</b>	<b>8.133</b>
1.5~6	<b>2.462</b>	1.903	<b>7</b>	<b>414.940</b>
1.5~6	<b>5.825</b>	2.090	<b>7</b>	<b>340.976</b>
1.5~6	<b>2.48</b>	1.905	<b>1</b>	<b>10.175</b>



## 4.4 IC Radiofrequency radiation exposure limits:

According to RSS-102 section 2.5.1, SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance

MHz	5	10	15	20	25	30	35	40	45	50	mm
≤300	71	101	132	162	193	223	254	284	315	345	mW
450	52	70	88	106	123	141	159	177	195	213	
835	17	30	42	55	67	80	92	105	117	130	
1900	7	10	18	34	60	99	153	225	316	431	
2450	4	7	15	30	52	83	123	173	235	309	
3500	2	6	16	32	55	86	124	170	225	290	
5800	1	6	15	27	41	56	71	85	97	106	

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance.

For 2.4G band device, the limit is  $P_{max} \leq 309mW$

For 5G band device, the limit is  $P_{max} \leq 106mW$

For BLE(NRF52811)@1cm, the limit is  $P_{max} \leq 7mW$



## 5 Measurement and Calculation

### 5.1 Maximum transmit power

BT

The Power Data is based on the RF Test Report SHCR230300042401

TestMode	Antenna	Channel	Maximum Peak Conducted Output Power (dBm)	Maximum Peak Conducted Output Power (mW)
DH5	Ant1	2402	3.85	2.43
		2441	4.51	2.82
		2480	3.6	2.29
2DH5	Ant1	2402	3.94	2.48
		2441	4.52	2.83
		2480	3.65	2.32
3DH5	Ant1	2402	4.27	2.67
		2441	4.87	<b>3.07</b>
		2480	3.96	2.49

BLE 4.0

The Power Data is based on the RF Test Report SHCR230300042402

Mode	TX Type	Frequency (MHz)	Maximum Peak Conducted Output Power (dBm)	Maximum Peak Conducted Output Power (mW)
1M	SISO	2402	-0.22	0.95
		2440	0.42	<b>1.10</b>
		2480	-0.51	0.89

BLE 5.0

The Power Data is based on the RF Test Report SHCR230300042405

TestMode	Antenna	Channel	Maximum Peak Conducted Output Power (dBm)	Maximum Peak Conducted Output Power (mW)
BLE_1M	Ant1	2402	-2.47	<b>0.57</b>
		2440	-3.19	0.48
		2480	-2.94	0.51
BLE_2M	Ant1	2402	-2.54	0.56
		2440	-3.2	0.48
		2480	-2.99	0.50



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### 2.4GHz WiFi

The Power Data is based on the RF Test Report SHCR230300042403

Test Mode	Test Frequency (MHz)	Maximum Peak Conducted Output Power (dBm)	Maximum Peak Conducted Output Power (mW)
11B	2412	15.93	39.17
	2437	15.73	37.41
	2462	16.71	<b>46.88</b>
11G	2412	11.03	12.68
	2437	12.12	16.29
	2462	12.26	16.83
11N20 SISO	2412	11.02	12.65
	2437	12.15	16.41
	2462	12.34	17.14
11N40 SISO	2422	10.24	10.57
	2437	10.80	12.02
	2452	10.03	10.07

### 5GHz WiFi:

The Power Data is based on the RF Test Report SHCR230300042404

Test Mode	Antenna	Channel	Maximum Peak Conducted Output Power (dBm)	Maximum Peak Conducted Output Power (mW)
11A	Ant1	5180	9.43	8.77
		5220	9.65	9.23
		5240	10.18	10.42
		5260	10.38	10.91
		5300	9.97	9.93
		5320	10.00	10.00
		5500	9.62	9.16
		5580	7.15	5.19
		5700	6.75	4.73
		5745	6.67	4.65
		5785	6.28	4.25
		5825	6.88	4.88
11N20SISO	Ant1	5180	8.60	7.24
		5220	7.97	6.27
		5240	8.94	7.83
		5260	9.82	9.59



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		5300	10.63	11.56
		5320	10.10	10.23
		5500	11.29	13.46
		5580	9.57	9.06
		5700	7.74	5.94
		5745	6.62	4.59
		5785	5.85	3.85
		5825	6.65	4.62
11N40SISO	Ant1	5190	9.24	8.39
		5230	9.33	8.57
		5270	9.75	9.44
		5310	9.83	9.62
		5510	11.50	<b>14.13</b>
		5550	11.14	13.00
		5670	8.50	7.08
		5755	7.02	5.04
		5795	5.89	3.88



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## 5.2 RF Exposure Calculation

### For SC20-WL module:

The best case gain of antenna(2.4GHz Band) is 2.2dBi. 2.2dBi logarithmic terms convert to numeric result is nearly 1.66, According to the formula. calculate the EIRP test result:

#### BT

$$\text{EIRP} = P \times G = 3.07 \text{ mW} \times 1.66 = 5.10 \text{ mW}$$

#### BLE 4.0

$$\text{EIRP} = P \times G = 1.1 \text{ mW} \times 1.66 = 1.83 \text{ mW}$$

#### 2.4GHz WiFi

$$\text{EIRP} = P \times G = 46.88 \text{ mW} \times 1.66 = 77.82 \text{ mW}$$

The best case gain of the antenna(5GHz Band) is 3.8dBi. 3.8dBi logarithmic terms convert to numeric result is nearly 2.4, According to the formula. calculate the EIRP test result:

#### 5GHz WiFi

$$\text{EIRP} = P \times G = 14.13 \text{ mW} \times 2.4 = 33.91 \text{ mW}$$

### For nRF52811 module:

The best case gain of the antenna is -3.86dBi. -3.86dBi logarithmic terms convert to numeric result is nearly 0.41, According to the formula. calculate the EIRP test result:

#### BLE 5.0

$$\text{EIRP} = P \times G = 0.57 \text{ mW} \times 0.41 = 0.23 \text{ mW}$$

The BT,BLE,2.4GHz WiFi,5GHz WiFi modules can transmit simultaneously, but the maximum rate of MPE is  $5.10/414.94+77.82/414.94+33.91/340.976+0.23/10.175 = 0.32 \leq 1$

**Remark:** we used the maximum power between the conducted power and ERP/EIRP to perform RF exposure exemption evaluation.

	Evaluation method	Exempt Limit(mW)	Verdict
<input type="checkbox"/>	Blanket 1 mW Blanket Exemption	1mW	N/A
<input type="checkbox"/>	MPE-based Exemption(ERP)	7mW(ERP) (2.4GHz Band)	N/A
<input checked="" type="checkbox"/>	SAR-based Exemption( $P_{th}$ )	414.94mW(ERP) (2.4GHz Band) 340.976mW(ERP) (5GHz Band) 10.175mW(ERP) (NRF52811 BLE)	Yes

So, the device is to qualify for FCC SAR test exemption, the exemption report is in lieu of the SAR report.



For IC:

### BT

$$\text{EIRP} = P \times G = 3.07 \text{ mW} \times 1.66 = 5.10 \text{ mW} = 0.0051 \text{ W} < 0.309 \text{ W}$$

### BLE 4.0

$$\text{EIRP} = P \times G = 1.1 \text{ mW} \times 1.66 = 1.83 \text{ mW} = 0.00183 \text{ W} < 0.309 \text{ W}$$

### 2.4GHz WiFi

$$\text{EIRP} = P \times G = 46.88 \text{ mW} \times 1.66 = 77.82 \text{ mW} = 0.07782 \text{ W} < 0.309 \text{ W}$$

### BLE 5.0

$$\text{EIRP} = P \times G = 0.57 \text{ mW} \times 0.41 = 0.23 \text{ mW} = 0.00023 \text{ W} < 0.007 \text{ W}$$

### 5GHz WiFi

$$\text{EIRP} = P \times G = 14.13 \text{ mW} \times 2.4 = 33.91 \text{ mW} = 0.03391 \text{ W} < 0.106 \text{ W}$$

The BT, BLE, 2.4GHz WiFi, 5GHz WiFi modules can transmit simultaneously, but the maximum rate of MPE is  $0.0051/0.309 + 0.07782/0.309 + 0.03391/0.106 + 0.00023/0.007 = 0.621 \leq 1$

So, the device is to qualify for FCC & IC SAR test exemption, the exemption report is in lieu of the SAR report.

-End of the Report-



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