

# RF Exposure Exemption Report

Manufacturer: LEGO System A/S  
Model: MOTOR NO. 21

In accordance with FCC CFR 47 Pt 1.1307



Prepared for: LEGO System A/S  
Aastvej 1  
7190 Billund  
Denmark

**Add value.  
Inspire trust.**

## COMMERCIAL-IN-CONFIDENCE

FCC ID: NPI104905

Document 75962744-10 Issue: 01

### SIGNATURE

NAME	JOB TITLE	RESPONSIBLE FOR	ISSUE DATE
Steve Marshall	Senior Engineer	Authorised Signatory	27 March 2025

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

FCC Accreditation  
294497/UK2010 Octagon House, Fareham Test Laboratory

### EXECUTIVE SUMMARY

The wireless devices described within this report are compliant with the exemption criteria related to human exposure to electromagnetic fields laid out in FCC CFR Title 47 Part 1.1307.



### DISCLAIMER AND COPYRIGHT

This non-binding report has been prepared by TÜV SÜD with all reasonable skill and care. The document is confidential to the potential Client and TÜV SÜD. No part of this document may be reproduced without the prior written approval of TÜV SÜD. © 2025 TÜV SÜD. This report relates only to the actual item/items tested.

### ACCREDITATION

Our UKAS Accreditation does not cover opinions and interpretations and any expressed are outside the scope of our UKAS Accreditation. Results of tests not covered by our UKAS Accreditation Schedule are marked NUA (Not UKAS Accredited).

TÜV SÜD  
is a trading name of TÜV SÜD Ltd  
Registered in Scotland at East Kilbride,  
Glasgow G75 0QF, United Kingdom  
Registered number: SC215164

TÜV SÜD Ltd is a  
TÜV SÜD Group Company

Phone: +44 (0) 1489 558100  
Fax: +44 (0) 1489 558101  
[www.tuvsud.com/en](http://www.tuvsud.com/en)

TÜV SÜD  
Octagon House  
Concorde Way  
Fareham  
Hampshire PO15 5RL  
United Kingdom



Contents

1      **Report Summary .....2**

1.1    Report Modification Record.....2

1.2    Introduction.....2

1.3    Brief Summary of Results .....3

1.4    Application Form .....3

1.5    Product Information .....5

2      **Assessment Details .....6**

2.1    Single RF Source options for determination of exemption.....6

2.2    Multiple RF Sources options for determination of exemption. ....7

2.3    Individual Antenna Port Exposure Results.....8

2.4    Combined Antenna Port RF Exposure Results FCC 1.1307(b)(3)(ii)(A) .....8



# 1 Report Summary

## 1.1 Report Modification Record

Alterations and additions to this report 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	27 March 2025

Table 1

## 1.2 Introduction

Applicant	LEGO System A/S
Manufacturer	LEGO System A/S
Model Number(s)	MOTOR NO. 21
Hardware Version(s)	EP2
Software Version(s)	0.3.1
Specification/Issue/Date	FCC 47 CFR Part 1.1307: 2022
Order Number	7000395228
Date	15-Oct-24
Related Document(s)	<ul style="list-style-type: none"><li>• KDB 447498 D04 v01</li><li>• FCC 47 CFR Part 2.1093: 2023</li></ul>



### 1.3 Brief Summary of Results

The wireless devices described within this report are compliant with the exemption criteria related to human exposure to electromagnetic fields laid out in FCC CFR Title 47 Part 1.1307.

The calculations shown in this report were made in accordance with the procedures specified in the applied test specification(s).

### 1.4 Application Form

If more than one frequency band is supported, please confirm which combinations of bands are capable of Simultaneous Transmit.	
--	--

#### Frequency Band 1: 2.4 GHz Bluetooth Low Energy

Antenna Model:	PCB	
Antenna length:	2.7	cm
Bottom frequency:	2402	MHz
Middle frequency:	2442	MHz
Top frequency:	2480	MHz

Maximum power (input to the antenna including a tolerance):	0	dBm
Antenna gain (or maximum gain allowed):	-7.56	dBi

Or

Field Strength Measurement:		dBμA/M
Measurement Distance:		cm

Separation distance from antenna to the user/bystander	0.5462	cm
Transmitter Duty Cycle:	33	%



Frequency Band 2: 13.56 MHz NFC

Antenna Model:	Loop antenna	
Antenna length:	31.4	cm
Bottom frequency:		MHz
Middle frequency:	13.56	MHz
Top frequency:		MHz

Maximum power (input to the antenna including a tolerance):		dBm
Antenna gain (or maximum gain allowed):		dBi

Or

Field Strength Measurement:	5,7	dB $\mu$ A/M
Measurement Distance:	300	cm

Separation distance from antenna to the user/bystander	0.4475	cm
Transmitter Duty Cycle:	ATM 100% normal 6%	%

The above information was provided by the applicant.

## 1.5 Product Information

### 1.5.1 Technical Description

The Equipment under test (EUT) was a LEGO System A/S, MOTOR NO. 21 incorporating Bluetooth Low Energy and NFC transmitters.

The primary function of the EUT is a Toy for use in a classroom.

### 1.5.2 Transmitter Description

The following radio access technologies and frequency bands are supported by the equipment under test.

Radio Access Technology	Frequency Band (MHz)	Minimum Frequency (MHz)	Output Power (dBm)	Duty Cycle (%)
Bluetooth Low Energy	2402-2480	2402	0.0	33
NFC	13.56	13.56	-38.03	100*

**Table 2 – Transmitter Description- FCC**

\* The duty cycle of 100% has been provided for test modes only and the production model will be less than this. For the sake of 'worst case' calculations, 100% has been used.

Note: Transmitter power includes upper bounds of uncertainty therefore maximum values are used.

### 1.5.3 Antenna Description

The following antennas are supported by the equipment under test.

Radio Access Technology	Antenna Model	Gain (dBi)	Antenna length (cm)	Minimum Separation Distance (mm)
Bluetooth Low Energy	PCB	-7.56	2.7	5.462
NFC	Loop Antenna	N/A*	31.4	4.475

**Table 3 – Antenna description**

\* Details for NFC power have been provided in the form of an H-field measurement. Thus, the separation of conducted power and gain is not possible.

In the case of more than one type of antenna being supported by the equipment, the calculation is based on the maximum of the antenna gains. If other antennas can be used that have greater gains, the minimum separation distances will need to be recalculated.

Note: Antenna gain includes upper bounds of uncertainty therefore maximum values are used.

### 1.5.4 Equipment Configuration

Simultaneous transmission: Bluetooth Low Energy and NFC



## 2 Assessment Details

### 2.1 Single RF Source options for determination of exemption.

Option	Reference	RF Exposure Test Exemptions for Single Source												
A (1-mW Test Exemption)	FCC 1.1307(b)(3)(i)(A)	The available maximum time averaged power is no more than 1 mW, regardless of separation distance.												
B (SAR-Based Exemption)	FCC 1.1307(b)(3)(i)(B)	<p>The available maximum timeaveraged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P<sub>th</sub> (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<sub>th</sub> is given by:</p> $P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}}(d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$ <p>Where</p> $x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right) \text{ and } f \text{ is in GHz;}$ <p>and</p> $ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$ <p><i>d</i> = the separation distance (cm);</p>												
C (MPE-Based Exemption)	FCC 1.1307(b)(3)(i)(C)	<p>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 λ/2π, 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 λ/4 or if the antenna gain is less than that of a half-wave dipole (1.64 linear value).</p> <p><b>TABLE 1 TO § 1.1307(b)(3)(i)(C)—SINGLE RF SOURCES SUBJECT TO ROUTINE ENVIRONMENTAL EVALUATION</b></p> <table><tr><th>RF Source frequency (MHz)</th><th>Threshold ERP (watts)</th></tr><tr><td>0.3–1.34 .....</td><td>1,920 R<sup>2</sup>.</td></tr><tr><td>1.34–30 .....</td><td>3,450 R<sup>2</sup>/f<sup>2</sup>.</td></tr><tr><td>30–300 .....</td><td>3.83 R<sup>2</sup>.</td></tr><tr><td>300–1,500 .....</td><td>0.0128 R<sup>2</sup>f.</td></tr><tr><td>1,500–100,000 .....</td><td>19.2R<sup>2</sup>.</td></tr></table>	RF Source frequency (MHz)	Threshold ERP (watts)	0.3–1.34 .....	1,920 R <sup>2</sup> .	1.34–30 .....	3,450 R <sup>2</sup> /f <sup>2</sup> .	30–300 .....	3.83 R <sup>2</sup> .	300–1,500 .....	0.0128 R <sup>2</sup> f.	1,500–100,000 .....	19.2R <sup>2</sup> .
RF Source frequency (MHz)	Threshold ERP (watts)													
0.3–1.34 .....	1,920 R <sup>2</sup> .													
1.34–30 .....	3,450 R <sup>2</sup> /f <sup>2</sup> .													
30–300 .....	3.83 R <sup>2</sup> .													
300–1,500 .....	0.0128 R <sup>2</sup> f.													
1,500–100,000 .....	19.2R <sup>2</sup> .													



## 2.2 Multiple RF Sources options for determination of exemption.

Option	Reference	
A 1-mW Test Exemption for Multiple Sources	FCC 1.1307(b)(3)(ii)(A)	The available maximum time averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(i)(A).
B Simultaneous Transmission with both SAR-based and MPE- Based Test Exemptions	FCC 1.1307(b)(3)(ii)(B)	in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.  $\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure Limit_k} \leq 1$





## 2.3 Individual Antenna Port Exposure Results

### 2.3.1 Single Source Calculation of Exposure at Specified Separation Distance FCC 1.1307 (b)(3)(i)(A) 'Option A'

RAT	Frequency (MHz)	Conducted Power Output mW	Duty Cycle %	Time Average Conducted Power Output mW	1.1307(b)(3)(ii)(A) Exemption (Yes/No)
Bluetooth Low Energy	2402	1.000000	33	0.330000	Yes
NFC	13.56	0.000157	100	0.000157	Yes

**Table 4 –Transmitter Result**

The calculations show that the individual transmitters comply with FCC 1.1307(b)(3)(i)(A) 1 mW based exception.

## 2.4 Combined Antenna Port RF Exposure Results FCC 1.1307(b)(3)(ii)(A)

### 2.4.1 Combination 1 – Option A 1mW Summation

RAT	Frequency (MHz)	Conducted Power Output mW	Duty Cycle %	Time Average Conducted Power Output mW	The sum of multiple sources is less than 1 mW during the time-averaging period?
Bluetooth Low Energy	2402	1.000000	33	0.330000	
NFC	13.56	0.000157	100	0.000157	
Summation				0.330157	Yes

**Table 5 –Transmitter Result**

The calculations show that the multiple transmitters comply with FCC 1.1307(b)(3)(ii)(A) summation-based exemption.