

RF Exposure Evaluation Declaration

FCC ID: 2AD6M-AX51
Applicant: P2 Mobile Technologies Limited
Product: AX51 Anywhere Network Node
Model No.: AX51
Brand Name: Anywhere Networks
FCC Classification: Digital Transmission System (DTS)
FCC Rule Part(s): FCC Part 2.1091
Evaluated Date: 2023-09-05
Result: Complies

Reviewed By:

Sunny Sun

Approved By:

Robin Wu



The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

The test report shall not be reproduced except in full without the written approval of MRT Technology (Suzhou) Co., Ltd.

Revision History

| Report No. | Version | Description | Issue Date | Note |
|---------------|---------|----------------|------------|-------|
| 2305RSU021-U3 | V01 | Initial Report | 2023-09-13 | Valid |
| | | | | |

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1. General Information

1.1. Applicant

P2 Mobile Technologies Limited

Unit D5, 19th Floor, TML Tower, No. 3, Hoi Shing Road, Tsuen Wan, New Territories, Hong Kong

1.2. Manufacturer

P2 Mobile Technologies Limited

Unit D5, 19th Floor, TML Tower, No. 3, Hoi Shing Road, Tsuen Wan, New Territories, Hong Kong

1.3. Testing Facility

| | |
|--------------------------|---|
| <input type="checkbox"/> | Test Site – MRT Suzhou Laboratory |
| | Laboratory Location (Suzhou - Wuzhong) |
| | D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China |
| | Laboratory Location (Suzhou - SIP) |
| | 4b Building, Liando U Valley, No.200 Xingpu Rd., Shengpu Town, Suzhou Industrial Park, China |
| | Laboratory Accreditations |
| | A2LA: 3628.01 CNAS: L10551 |
| | FCC: CN1166 ISED: CN0001 |
| | VCCI: <input type="checkbox"/> R-20025 <input type="checkbox"/> G-20034 <input type="checkbox"/> C-20020 <input type="checkbox"/> T-20020 |
| | <input type="checkbox"/> R-20141 <input type="checkbox"/> G-20134 <input type="checkbox"/> C-20103 <input type="checkbox"/> T-20104 |
| <input type="checkbox"/> | Test Site – MRT Shenzhen Laboratory |
| | Laboratory Location (Shenzhen) |
| | 1G, Building A, Junxiangda Building, Zhongshanyuan Road West, Nanshan District, Shenzhen, China |
| | Laboratory Accreditations |
| | A2LA: 3628.02 CNAS: L10551 |
| | FCC: CN1284 ISED: CN0105 |
| <input type="checkbox"/> | Test Site – MRT Taiwan Laboratory |
| | Laboratory Location (Taiwan) |
| | No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.) |
| | Laboratory Accreditations |
| | TAF: 3261 |
| | FCC: 291082, TW3261 ISED: TW3261 |

1.4. Product Information

| | |
|------------------------|---|
| Product Name | AX51 Anywhere Network Node |
| Model No. | AX51 |
| EUT Identification No. | 20230509Sample#01(For Conducted Testing) 20230803Sample#03(For Radiated Testing) |
| Wi-Fi Specification | 802.11a/b/g/n/ac/ax |
| Antenna Specification | Refer to Clause 1.7 |
| Operating Temp. | -35~60°C |

Notes:

1. The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer.
2. Due to the same modular and antenna between AX51 and AX52, we use all testing data of AX52.

1.5. Antenna Details

| Antenna Type | Frequency Band (MHz) | Antenna Gain (dBi) | | Directional Gain (dBi) |
|------------------|----------------------|--------------------|-------|------------------------|
| | | Ant 0 | Ant 1 | |
| Wi-Fi (2*2 MIMO) | | | | |
| Panel Antenna | 5150 ~ 5850 | 17 | 17 | 17 |

Remark:

1. The 17dBi panel antenna is the internal panel antenna.
2. Due to all antennas belong to Cross-Polarized Antenna, so for power and power spectral density (PSD) measurements, Directional Gain = Antenna Gain.
3. The EUT supports Cyclic Delay Diversity (CDD) mode on 802.11a/n/ac/ax.
4. The EUT also supports Beam Forming mode on 802.11n/ac/ax, not include 802.11a. Manufacturer automatically backs power down based on a $10\log(N)$ factor based on CDD power.

1.6. Device Classification

According to the user manual, the antenna of this device is at least 20cm away from the body of the user, this device is classified as a Mobile Device. So, the RF exposure evaluation requirements of § 2.1091 for mobile device exposure conditions subject to MPE limits.

1.7. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 2.1091 & KDB 447498 D04 Interim General RF Exposure Guidance v01

2. RF Exposure Evaluation

2.1. Test Limits

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)

Limits For Maximum Permissible Exposure (MPE)

| Frequency Range (MHz) | Electric Field Strength (V/m) | Magnetic Field Strength (A/m) | Power Density (mW/cm ²) | Average Time (Minutes) |
|---|-------------------------------|-------------------------------|-------------------------------------|------------------------|
| (A) Limits for Occupational/ Control Exposures | | | | |
| 0.3-3.0 | 614 | 1.63 | *(100) | ≤6 |
| 3.0-30 | 1842/f | 4.89/f | *(900/f ²) | <6 |
| 30-300 | 61.4 | 0.163 | 1.0 | <6 |
| 300-1,500 | -- | -- | f/300 | <6 |
| 1,500-100,000 | -- | -- | 5 | <6 |
| (B) Limits for General Population/ Uncontrolled Exposures | | | | |
| 0.3-1.34 | 614 | 1.63 | *(100) | <30 |
| 1.34-30 | 824/f | 2.19/f | *(180/f ²) | <30 |
| 30-300 | 27.5 | 0.073 | 0.2 | <30 |
| 300-1,500 | -- | -- | f/1500 | <30 |
| 1,500-100,000 | -- | -- | 1.0 | <30 |

f= frequency in MHz. * = Plane-wave equivalent power density.

2.2. MPE Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option 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 §1.1307(b)(3)(ii)(A) of this section.

Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option 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 (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 is given by:

$$P_{th}(mW) = \{ERP_{20cm}(d / 20cm)^x \quad d \leq 20cm$$

$$P_{th}(mW) = \{ERP_{20cm} \quad 20cm < d \leq 40cm$$

Where

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

and

$$ERP_{20cm}(mW) = \{2040f \quad 0.3GHz \leq f < 1.5GHz$$

$$ERP_{20cm}(mW) = \{3060 \quad 1.5GHz \leq f \leq 6GHz$$

(Option 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 | 1920R ² |
| 1.34-30 | 3450R ² /f ² |
| 30-300 | 3.83R ² |
| 300-1,500 | 0.0128R ² f |
| 1,500-100,000 | 19.2R ² |

For multiple RF sources: Multiple RF sources are exempt if:

(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 §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(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.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure\ Limit_k} \leq 1$$

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

$P_{th,i}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i .

ERP_j = the ERP of fixed, mobile, or portable RF source j .

$ERP_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source j , at a distance of at least $\lambda/2\pi$ according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

$Evaluated_k$ = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

$Exposure\ Limit_k$ = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k , as applicable from §1.1310 of this chapter.

2.3. Calculated Result

| | | | | |
|-----------|----------------------------|--|--|--|
| Product | AX51 Anywhere Network Node | | | |
| Test Item | RF Exposure Evaluation | | | |

| Test Mode | Frequency Band (MHz) | Tune-up Conducted Power (dBm) | Antenna Gain (dBi) | Tune-up EIRP (dBm) |
|-----------------|----------------------|-------------------------------|--------------------|--------------------|
| 802.11a/n/ac/ax | 5150 ~ 5850 | 19 | 17 | 36 |

Note: Tune-up power was declared by manufacturer.

For single RF source, Option B

| Test Mode | $\lambda / 2 \pi$ (m) | R (m) | Tune-up ERP (mW) | Threshold ERP (mW) |
|-------------|-----------------------|-------|------------------|--------------------|
| Wi-Fi (NII) | 0.0092 | 0.20 | 2426.61 | 3060 |

Note: R is from user manual.

Therefore, the device qualifies for RF exposure test exemption.