

KDB 680106 explains when a PAG is required for WPT devices. The 6 conditions detailed in section 5 of that publication are addressed below.

Power transfer frequency is less than 1 MHz.	This device operates at 917.5 MHz
Output power from each primary coil is less than or equal to 15 watts.	The total transmitted power is 34.5 dBm which is greater than 1W
The system may consist of more than one source primary coils, charging one or more clients. If more than one primary coil is present, the coil pairs may be powered on at the same time.	This device has a single antenna and supports charging of a single device.
Client device is placed directly in contact with the transmitter.	The client device is placed on the charger.
Mobile exposure conditions only (portable exposure conditions are not covered by this exclusion).	The charger is designed for mobile use – it requires external power (via AC-DC adapter and USB-C interface). It does not include a battery and is not designed for portable use.
The aggregate H-field strengths anywhere at or beyond 15 cm surrounding the device, and 20 cm away from the surface from all coils that by design can simultaneously transmit, and while those coils are simultaneously energized, are demonstrated to be less than 50% of the MPE limit.	<p>As this device operates at 917.5MHz RF exposure is addressed using SAR measurement and not by measurement of E- and H- fields. Due to the low SAR values measurements are made at distances much less than the 15cm / 20cm required by the KDB. Actual distances were 0mm from all sides, 0mm from the top (0mm between client device and phantom, 13cm between top of device and phantom). All measured values are significantly lower than 50% of the limit at the reduced distance.</p> <p>The testing follows previous guidance for similar devices.</p>