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 from 917.5MHz.
Output power from each primary coil is less than or equal to 15 watts.	The total transmitted power is 41.76 dBm which is around 15W.
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 receiver.
Client device is placed directly in contact with the transmitter.	The client device can be charged at distances greater than 1m.
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.	As this device operates at 917.5MHz RF exposure is addressed using SAR measurement and not by measurement of E- and H- fields. SAR values measurements are made at 35cm in front the charger per KDB inquiry. Actual test distances were 10cm from all sides, 5cm from the back. All measured values are significantly lower than 50% of the limit at the reduced distance.

KDB 680106-DR04 explains the 4 conditions that are required for Part 18 Wireless Power Transfer Devices Beyond 1 Meter Distances. The 4 conditions detailed in section 5 of that publication are addressed below.

The applicant must demonstrate that the RF field in all locations anywhere at or beyond one meter is at or below the level that would be present within 1 meter when all devices being charged are within 1 meter of the transmitter. In other words, the RF emissions must be unaffected by the placement of the load/target device.	SAR values were measured at 35cm and 44cm and showed the measurement at the 35cm distance was significantly higher than the value measured at 44cm distance. Measurements at distances of 1m or more would be impractical as the readings would be too low to measure.
The device may only operate indoor.	As per User Manual the system is designed for indoor use only as it is not weatherproofed and not intended to be used outside. Device will be professionally installed to ensure indoor use only.
Devices shall professionally installed.	As per User Manual professional installation is required for the device. Device is intended to be used in commercial, industrial, and retailer environments. Training documentation will be provided to installers during distribution.
The indoor operations must be configured (e.g., through proper positioning of transmitter and/or attenuating material structures) such that when measured outdoors, the maximum fundamental and unwanted radiated emissions of the Part 18 device on any non-ISM frequency meet the limits in Part 15 of the Commission's rules. The distance specified in Part 15 (§ 15.209(a)) for evaluating field strength is to be measured from the outer surface of the structure delimiting the indoor operations.	Report number 14272097-E1V1 evaluates the device with the limits in Part 15 (§ 15.209(a)) of the Commission's rules on any non-ISM frequency. When factoring median attenuation loss from Figure 1 of ITU-R P.2109-1 for horizontal incidence the device is below the limits in Part 15 (§ 15.209(a)) of the Commission's rules on any non-ISM frequency. Please refer to the table below.

Frequency Range (MHz)	Worst Case Frequency (MHz)	Level (dBuV/m)	Distance (m)	15.209(a) Limit (dBuV/m)	Wall Attenuation (dB)	Expected Margin 3m from external walls of building
0.009-0.490	0.453	-35.12	300	14.48	Not Stated	49.60 dB
0.490-1.705	1.170	4.90	30	26.26	Not Stated	21.36 dB
1.705-30.0	20.525	-11.91	30	29.50	Not Stated	41.41 dB
30-1000	857.957	55.75	3	46.00	>10	>0.25 dB
1000-3000	1785.800	66.72	3	54.00	>15	>2.28 dB
3000-10000	9821.919	52.07	3	54.00	>17	>18.93 dB