

## **FCC§15.247 (i), §1.1307 (b) (3) &§2.1093 – RF EXPOSURE**

### **Applicable Standard**

According to FCC §2.1093 and §1.1307(b) (3), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission’s guideline.

According to KDB 447498 D04 Interim General RF Exposure Guidance

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 timeaveraged power or maximum time-averaged ERP, whichever is greater.

Per § 1.1307(b)(3)(i)(B), for single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2) of this section): A single RF source is exempt if:

the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (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).  $P_{th}$  is given by:

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

Where

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

and

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

$d$  = the separation distance (cm);

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

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:

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

## Result

### For worst case:

| Mode      | Frequency (MHz) | P <sub>th</sub> |       | Antenna Gain |       | Maximum tune-up conducted power (dBm) | Exemption |
|-----------|-----------------|-----------------|-------|--------------|-------|---------------------------------------|-----------|
|           |                 | (mW)            | (dBm) | (dBi)        | (dBd) |                                       |           |
| Bluetooth | 2402-2480       | 2.72            | 4.35  | 0.17         | -1.98 | 2.0                                   | Compliant |
| BLE       | 2402-2480       | 2.72            | 4.35  | 0.17         | -1.98 | 2.0                                   | Compliant |

- Note: 1. The tune up conducted power was declared by the applicant.  
 2. 0dBd=2.15dBi  
 3. The antenna gain is -1.98dBd, so the maximum tune-up conducted power was used for evaluation.  
 4. The Bluetooth and BLE can transmit simultaneously.  
 5. To maintain compliance with the FCC's RF exposure guidelines, place the equipment at least 0.5cm from nearby persons.

Simultaneous transmitting consideration (worst case):

The ratio= $P_{BT}/P_{th} + P_{BLE}/P_{th} = 2.0/4.35 + 2.0/4.35 = 0.92 < 1.0$ , so simultaneous exposure is compliant.

**So the stand-alone SAR evaluation can be exempted.**