5 FCC §2.1091, §15.247(i) & ISEDC RSS-102- RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm²)	Averaging Time (minutes)	
Limits for General Population/Uncontrolled Exposure					
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	
300-1500	/	/	f/1500	30	
1500-100,000	/	/	1.0	30	

f = frequency in MHz

According to ISED RSS-102 Issue 5:

2.5.2 Exemption Limits for Routine Evaluation – RF Exposure Evaluation

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz⁶ and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the
 device is equal to or less than 4.49/f^{0.5} W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the
 device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1.31 x 10⁻² f^{0.6834} W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

^{* =} Plane-wave equivalent power density

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

5.3 MPE Results for the FCC

Standalone

900 MHz (FCC ID: 2AE5A-SRZEUS2)

Maximum output power at antenna input terminal (dBm): 12.386 Maximum output power at antenna input terminal (mW): 17.322

Prediction distance (cm): 20 Prediction frequency (MHz): 927.8

Maximum Antenna Gain, typical (dBi): -5.0

Maximum Antenna Gain (numeric): 0.316

Power density of prediction frequency at 20.0 cm (mW/cm²): 0.001090

FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 0.6185

MPE Ratio(numeric): 0.002

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.001090 mW/cm². Limit is 0.6185 mW/cm².

Wi-Fi Radio (FCC ID: 2ADHKATWINC1500)

Maximum output power at antenna input terminal (dBm): 23.03

Maximum output power at antenna input terminal (mW): 200.9

Prediction distance (cm): 20

Prediction frequency (MHz): 2437

Maximum Antenna Gain, typical (dBi): -6.16

Maximum Antenna Gain (numeric): 0.242

Power density of prediction frequency at 20.0 cm (mW/cm²): 0.010

FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 1.0

MPE Ratio(numeric): 0.010

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.02003 mW/cm². Limit is 1.0 mW/cm².

Cellular Radio (FCC ID: XMR2020BG95M2)

Band 2:

Maximum output power at antenna input terminal (dBm):	<u>22</u>
Maximum output power at antenna input terminal (mW):	158.49
Prediction distance (cm):	<u>20</u>
Prediction frequency (MHz):	<u>1850</u>
Maximum Antenna Gain, typical (dBi):	2.76
Maximum Antenna Gain (numeric):	1.89
Power density of prediction frequency at 20.0 cm (mW/cm ²):	0.0595
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm ²):	1.0

MPE Ratio(numeric): 0.0595

Band 4:

Maximum output power at antenna input terminal (dBm):	<u>22</u>
Maximum output power at antenna input terminal (mW):	<u>158.49</u>
<u>Prediction distance (cm):</u>	<u>20</u>
Prediction frequency (MHz):	<u>1710</u>
Maximum Antenna Gain, typical (dBi):	<u>2.95</u>
Maximum Antenna Gain (numeric):	<u>1.97</u>
Power density of prediction frequency at 20.0 cm (mW/cm ²):	0.0622
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm ²):	1.0
MPE Ratio(numeric):	0.0622

Band 12:

Maximum output power at antenna input terminal (dBm):	
Maximum output power at antenna input terminal (mW):	<u>158.49</u>
Prediction distance (cm):	<u>20</u>
Prediction frequency (MHz):	<u>699</u>
Maximum Antenna Gain, typical (dBi):	<u>-1.05</u>
Maximum Antenna Gain (numeric):	0.79
Power density of prediction frequency at 20.0 cm (mW/cm ²):	0.0248
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²):	0.466
MPE Ratio(numeric):	<u>0.0531</u>

Co-location

The 900 MHz radio can transmit with Wi-Fi simultaneously or with LTE cellular radio simultaneously. The combined MPE radio is 0.002 + 0.010 = 0.012 or 0.002 + 0.0622 = 0.0642 which are less than the limit of 1.0.

5.4 RF exposure evaluation exemption for IC

900 MHz (IC: 20891-SRZEUS2)

Maximum Conducted power = 12.386 dBm which is lesser than $1.31 \times 10^{-2} f^{0.6834} = 1.3706 \text{ W} = 31.37 \text{ dBm}$

The RF exposure evaluation is exempt.

2.4 GHz Wi-Fi (IC: 20266-WINC1500PB)

Maximum Conducted power = 23.03 dBm which is lesser than $1.31 \times 10^{-2} f^{0.6834} = 2.703014$ W = 34.32 dBm

The RF exposure evaluation is exempt.

Cellular Radio (IC: 10224A-2020BG95M2)

Maximum EIRP power = 22 dBm + 2.95 dBi = 24.95 dBm for LTE band 4 which is lesser than $1.31 \times 10^{-2} f^{0.6834}$ = 2.121782 W = 33.27 dBm

The RF exposure evaluation is exempt.