

FCC §1.1307 (B) & §2.1091- MPE-BASED EXEMPTION

Applicable Standard

According to subpart 2.1091 systems operating under the provisions of this section shall be operated in a manner that ensures the public is not exposed to RF energy level in excess of the communication guidelines.

According to KDB 447498 D04 Interim General RF Exposure Guidance

MPE-Based Exemption:

General frequency and separation-distance dependent MPE-based effective radiated power(ERP) thresholds are in Table B.1 [Table 1 of § 1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

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	1,920 R ² .
1.34-30	3,450 R ² /f ² .
30-300	3.83 R ² .
300-1,500	0.0128 R ² f.
1,500-100,000	19.2R ² .

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:

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

Result

Mode	Frequency (MHz)	Tune up conducted power [#]	Antenna Gain [#]		ERP		Evaluation Distance (m)	ERP Limit (mW)
		(dBm)	(dBi)	(dBd)	(dBm)	(mW)		
BT	2402-2480	11.5	2.97	0.82	12.32	17.06	0.2	768
BLE	2402-2480	2.5	2.97	0.82	3.32	2.15	0.2	768
2.4G Wi-Fi	2412-2462	20.0	2.97	0.82	20.82	120.78	0.2	768
5.2G Wi-Fi	5180-5240	16.5	4.34	2.19	18.69	73.96	0.2	768
GSM850*	824-849	26.24	-0.8	-2.95	23.29	213.30	0.2	422
PCS1900*	1850-1910	20.99	3.58	1.43	22.42	174.58	0.2	768
WCDMA B2	1850-1910	22.5	3.58	1.43	23.93	247.17	0.2	768
WCDMA B5	824-849	24.0	-0.8	-2.95	21.05	127.35	0.2	422
LTE B2	1850-1910	22.0	3.58	1.43	23.43	220.29	0.2	768
LTE B4	1710-1755	22.0	3.73	1.58	23.58	228.03	0.2	768
LTE B5	824-849	23.0	-0.8	-2.95	20.05	101.16	0.2	422
LTE B7	2500-2570	21.5	5.08	2.93	24.43	277.33	0.2	768
LTE B38	2570-2620	21.5	5.00	2.85	24.35	272.27	0.2	768
LTE B40 Lower	2305-2315	19.5	5.32	3.17	22.67	184.93	0.2	768
LTE B40 Upper	2350-2360	19.5	5.32	3.17	22.67	184.93	0.2	768
LTE B41	2496-2690	22.0	5.08	2.93	24.93	311.17	0.2	768

Note: 1. The tune up conducted power and antenna gain was declared by the applicant.
 2. The BT, 2.4G Wi-Fi and 5G Wi-Fi can transmit at same time.
 3. 0dBd=2.15dBi

Note*: It was the time average power according to the duty cycle.

Mode		Tune-up Peak Output Power (dBm)			Tune-up Average Output Power (dBm)		
		Low	Middle	High	Low	Middle	High
GPRS850	1 slot	32.5	32.5	32.5	23.47	23.47	23.47
	2 slots	31.5	31.5	31.5	25.48	25.48	25.48
	3 slots	30.5	30.5	30.5	26.24	26.24	26.24
	4 slots	28.5	28.5	28.5	25.49	25.49	25.49
GPRS1900	1 slot	28.0	28.0	28.0	18.97	18.97	18.97
	2 slots	26.5	26.5	26.5	20.48	20.48	20.48
	3 slots	25.0	25.0	25.0	20.74	20.74	20.74
	4 slots	24.0	24.0	24.0	20.99	20.99	20.99

Note: the duty cycle for 1 slot is 1/8, 2 slots is 1/4, 3 slots is 3/8, 4 slots is 1/2
 The average power=Peak power+ duty cycle factor
 Duty cycle factor=10*log (duty cycle)

NFC:

Mode	Frequency (MHz)	Maximum E-Field (dBuV/m@3m)	Maximum EIRP (dBm)	ERP		Evaluation Distance (m)	ERP Limit (mW)
				(dBm)	(mW)		
NFC	13.56	72.09	-23.11	-25.26	0.003	0.2	751

Note: EIRP = E-Field – 95.2 @3m, ERP = EIRP-2.15

Simultaneous transmitting consideration (worst case):

$$\begin{aligned} \text{The ratio} &= \text{ERP}_{\text{BT}}/\text{limit} + \text{ERP}_{\text{2.4G Wi-Fi}}/\text{limit} + \text{ERP}_{\text{5G Wi-Fi}}/\text{limit} + \text{ERP}_{\text{GSM850}}/\text{limit} + \text{ERP}_{\text{NFC}}/\text{limit} \\ &= 17.06/768 + 120.78/768 + 73.96/768 + 213.3/422 + 0.003/751 = 0.781 < 1.0 \end{aligned}$$

So simultaneous exposure is compliant.

To maintain compliance with the FCC’s RF exposure guidelines, place the equipment at least 20cm from nearby persons.

Result: Compliant.