FCC Part 1 Subpart I
FCC Part 2 Subpart J
RSS 102 ISSUE 6

RF EXPOSURE REPORT

FOR

57 – 71 GHz Wireless Transmitter

MODEL NUMBER: C420 / P421 / D621 / P621

FCC ID: 2AMP5-46211
IC: 22992-46211

Contains FCC ID: 2AC7Z-ESPC3MINI1
Contains IC: 21098-ESPC3MINI1

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ACCREDITED
CERT #0751.06

Revision History

Rev.	Issue Date	Revisions	Revised By
V1	2024-10-11	Initial Issue	Noah Bennett
V2	2024-11-12	Updated power value; misc. editorial update	Mike Antola

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1. ATTESTATION OF TEST RESULTS

COMPANY NAME: Altowav Inc.
7801 E. Bush Lake Rd. Suite 300
Minneapolis, MN 55439 USA

EUT DESCRIPTION: 57-71 GHz Wireless Transmitter

MODEL: C240 / P421 / D621 / P621

SERIAL NUMBER: KB-C0-01-18 / KB-C0-00-DA

DATE TESTED: 2024-08-23 to 2024-08-29

APPLICABLE STANDARDS	
STANDARD	**TEST RESULTS**
FCC PART 1 SUBPART I & PART 2 SUBPART J	Complies
RSS 102 ISSUE 6	Complies

UL LLC tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

This document may not be altered or revised in any way unless done so by UL LLC and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL LLC will constitute fraud and shall nullify the document.

Approved & Released For
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2. TEST METHODOLOGY

All calculations were made in accordance with FCC Parts 1.1310, 2.1091, 2.1093, KDB 447498 D01 v06, KDB 447498 D03 V01, IEEE Std C95.1-2005, IEEE Std C95.3-2002, IC Safety Code 6 and RSS 102 Issue 6.

3. REFERENCES

Output power, and Antenna gain data is excerpted from product documentation provided by the applicant.

Note: Output Power is the declared maximum power across production units.

4. FACILITIES AND ACCREDITATION

UL LLC is accredited by A2LA, Cert. No. 751.06, for all testing performed within the scope of this report. Testing was performed at the locations noted below.

	Address	ISED CABID	ISED Company Number	FCC Registration
☐	12 Laboratory Drive Research Triangle Park, NC 27709, U.S.A.	US0067	2180C	825374
☒	2800 Perimeter Dr., Suite B, Morrisville, NC 27560, U.S.A.		27265	

5. DECISION RULES AND MEASUREMENT UNCERTAINTY

5.1. METROLOGICAL TRACEABILITY

The measuring equipment utilized to perform the tests documented in this report has been calibrated in accordance with the manufacturer's recommendations, and is traceable to recognized national standards.

5.2. DECISION RULES

For all tests where the applicable U_{LAB} <= U_{MAX} the Decision Rule is based on Simple Acceptance in accordance with ISO Guide 98-4: 2012 Clause 8.2, where U_{MAX} = 30% (0.3) for RF Exposure evaluations. (Measurement uncertainty is not taken into account when stating conformity with a specified requirement.)

For all tests where the applicable U_{LAB} > U_{MAX} the Decision Rule is based on Guarded Acceptance in accordance with ISO Guide 98-4: 2012 Clause 8.3.2, with a guard band equal to (U_{LAB} – U_{MAX}), where U_{MAX} = 30% (0.3) for RF Exposure evaluations. (Test results are adjusted by the value of the guard band to determine conformity with a specified requirement.)

5.3. MEASUREMENT UNCERTAINTY

Not applicable – calculations are based on the maximum output power and, where applicable, nominal antenna gains as declared by the manufacturer.

6. MAXIMUM PERMISSIBLE EXPOSURE (LIMITS AND EQUATIONS)

6.1. FCC RULES

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm^2)	Averaging time (minutes)
(A) Limits for Occupational/Controlled Exposure				
0.3-3.0	614	1.63	*100	6
3.0-30	1842/f	4.89/f	$*900/f^2$	6
30-300	61.4	0.163	1.0	6
300-1,500			f/300	6
1,500-100,000			5	6
(B) 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
300-1,500			f/1500	30
1,500-100,000			1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

Notes:

(1) Occupational/controlled exposure limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when a person is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

(2) General population/uncontrolled exposure limits apply in situations in which the general public may be exposed, or in which persons who are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure

6.2. ISED RULES

For the purpose of this standard, Innovation, Science and Economic Development (ISED) has adopted the SAR and RF field strength limits established in Health Canada's RF exposure guideline, Safety Code 6.

Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Dentisty (W/m^2)	Reference Period (minutes)
0.003-10[21]	83	90	-	Instantaneous*
0.1-10	-	$0.73/f$	-	6**
1.1-10	$87/f^{0.5}$	-	-	6**
10-20	27.46	0.0728	-2	6
20-48	$58.07/f^{0.25}$	$0.1540/f^{0.25}$	$8.944/f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	$3.142f^{0.3417}$	$0.008335f^{0.3417}$	$0.02619f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	$616000/f^{1.2}$
150000-300000	$0.158f^{0.5}$	$4.21 \times 10^{-4}f^{0.5}$	$6.67 \times 10^{-5}f$	$616000/f^{1.2}$

Note: f is frequency in MHz.

* Based on nerve stimulation (NS).

** Based on specific absorption rate (SAR).

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6.3. EQUATIONS

POWER DENSITY

Power density is given by:

S = EIRP / (4 * Pi * D^2)

Where

S = Power density in mW/cm^2
EIRP = Equivalent Isotropic Radiated Power in mW
D = Separation distance in cm

Power density in units of mW/cm^2 is converted to units of W/m^2 by multiplying by 10.

DISTANCE

Distance is given by:

D = SQRT (EIRP / (4 * Pi * S))

Where

D = Separation distance in cm
EIRP = Equivalent Isotropic Radiated Power in mW
S = Power density in mW/cm^2

SOURCE-BASED DUTY CYCLE

Where applicable (for example, multi-slot cell phone applications) a duty cycle factor may be applied.

Source-based time-averaged EIRP = (DC / 100) * EIRP

Where

DC = Duty Cycle in %, as applicable
EIRP = Equivalent Isotropic Radiated Power in mW

MIMO AND COLOCATED TRANSMITTERS (IDENTICAL LIMIT FOR ALL TRANSMITTERS)

For multiple chain devices, and colocated transmitters operating simultaneously in frequency bands where the limit is identical, the total power density is calculated using the total EIRP obtained by summing the EIRP (in linear units) of each transmitter.

Total EIRP = (EIRP1) + (EIRP2) + ... + (EIRPn)

where

EIRPx = Source-based time-averaged EIRP of chain x or transmitter x

The total EIRP is then used to calculate the Power Density or the Distance as applicable.

MIMO AND COLOCATED TRANSMITTERS (NON-IDENTICAL LIMIT FOR ALL TRANSMITTERS)

For multiple colocated transmitters operating simultaneously in frequency bands where different limits apply:

The Power Density at the specified separation distance is calculated for each transmitter chain or transmitter.

The fraction of the exposure limit is calculated for each chain or transmitter as
(Power Density of chain or transmitter) / (Limit applicable to that chain or transmitter).

The fractions are summed.

Compliance is established if the sum of the fractions is less than or equal to one.

7. RF EXPOSURE RESULTS

This report contains data provided by the customer which can impact the validity of results. UL LLC is only responsible for correctly integrating customer-provided data with measurements performed by UL LLC.

In the table(s) below, Power and Gain are entered in units of dBm and dBi respectively and conversions to linear forms are used for the calculations.

The minimum separation distance of the D621 EUT is **34cm**.

The minimum separation distance of the C420 EUT is **28cm**.

Model D621

Multiple chain or colocated transmitters

Band	(GHz)	60.48GHz	2.4 GHz
Mode		60GHz	WLAN
Transmitter		D621	D621
Separation Distance	(cm)	34	34
Output Power	(dBm)	15.54	20.5
Antenna Gain	(dBi)	24.36	3.96
Duty Cycle	(%)	100	100
Source Based EIRP	(mW)	9772.372	279.3
FCC Power Density	(mW/cm^2)	0.673	0.02
FCC Power Density Limit	(mW/cm^2)	1	1
FCC Fraction of Limit	(%)	67.31	1.92
FCC Sum of Fractions (%)	**69.23**		
ISED Power Density	(W/m^2)	6.731	0.192
Total Power Density	(W/m^2)	6.530	
ISED Power Density Limit	(W/m^2)	10	5.366
ISED Fraction of Limit	(%)	67.3	3.6
ISED Sum of Fractions (%)	**70.89**		

Model C420

Single Chain and non-colocated transmitters											
Band	**Mode**	**FCC Limit (mW/cm^2)**	**IC Limit (W/m^2)**	**Output AVG Power (dBm)**	**Antenna Gain (dBi)**	**EIRP (dBm)**	**Duty Cycle (%)**	**EIRP (mW)**	**Power Density (W/m^2)**	**Separ. Distance FCC (cm)**	**Separ. Distance ISED (cm)**
60.48GHz	C420	1.00	10.00	15.54	24.36	39.90	100.0	9772.37	1.00	27.89	27.89

Notes:

1) For MPE the KDB 447498 D01 v6 and RSS-102 the calculations use the maximum rated power.

2) The manufacturer configures output power so that the maximum power, after accounting for manufacturing tolerances, will never exceed the maximum power level measured.

3) The output power in the tables above is the maximum power per chain among various channels and various modes within the specific band.

4) The antenna gain in the tables above is the maximum antenna gain among various channels within the specified band.

5) 100% Duty Cycle was used as worst-case.

6) Worst-case EIRP reported amongst all models.