DEKRA Testing and Certification, S.A.U.
Parque Tecnológico de Andalucía,
c/ Severo Ochoa nº 2 · 29590 Campanillas · Málaga · España

Assessment report No:

NIE: 56316RAN.002A1

Assessment report (Modification 1)
RF EXPOSURE REPORT ACCORDING TO
FCC 47 CFR Part 2.1093
ISED RSS -102 Issue 5:2015

Identification of item tested.....:	GPS Tracking Device
Trade mark .....:	Ping
Model and /or type reference .....:	P0100D0, P0100D1, P0100D2, P0100D3, P0100D4, P0100D5, P0100D6, P0100D7, P0100D8, P0100D9
Other identification of the product .....:	FCC ID: 2AOL3-P0100DX IC: 23634-P0100DX
Final HW version .....:	R1.8
Final SW version .....:	---
Features.....:	---
Applicant.....:	PING GPS 19825 North Cove Rd, Ste 173 Cornelius, NC 28031
Test method requested, standard.....:	FCC 47 CFR Part 2.1093. (10-1-15 Edition) Radiofrequency radiation exposure evaluation: portable devices. ISED RSS-102 Issue 5 (2015-03) – Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
Summary.....:	IN COMPLIANCE
Approved by (name / position & signature) .....:	Miguel Lacave Antennas Lab Manager  MIGUEL LACAVE GARCÍA 2018.03.07 09:36:48 +01'00'
Date of issue .....:	2018-03-07
Report template No.....:	FAN24_01

Index

Competences and guarantees

In order to assure the traceability to other national and international laboratories, DEKRA has a calibration and maintenance program for its measurement equipment.

DEKRA guarantees the reliability of the data presented in this report, which is the result of the measurements and the tests performed to the item under test on the date and under the conditions stated on the report and, it is based on the knowledge and technical facilities available at DEKRA at the time of performance of the test.

DEKRA is liable to the client for the maintenance of the confidentiality of all information related to the item under test and the results of the test.

The results presented in this Test Report apply only to the particular item under test established in this document.

General conditions

1. This report is only referred to the item that has undergone the test.
2. This report does not constitute or imply on its own an approval of the product by the Certification Bodies or competent Authorities.
3. This document is only valid if complete; no partial reproduction can be made without previous written permission of DEKRA.
4. This test report cannot be used partially or in full for publicity and/or promotional purposes without previous written permission of DEKRA and the Accreditation Bodies.

Identification of the client and manufacturer

PING GPS

19825 North Cove Rd, Ste 173. Cornelius, NC 28031

Modifications to the reference test report

It was introduced the following modifications in respect to the test report number 56316RAN.002, in the next clauses and sub-clauses:

Clauses / Sub-clauses	Modification	Justification
Title page	Updated applicant information	Applican information update requested.
General description of the device under evaluation, Page 4.	Reference to followed guidance of section "6.3. Low transmission duty fator devices" of KDB 447498 D01 has been included.	Information requested.
General description of the device under evaluation, Page 4.	Reference to section "4.1. General test requirements" of KDB 447498 D01, related to device's simultaneous transmission, has been included.	Information requested.
FCC Evaluation Results, Page 10.	Reference to followed guidance of section "6.3. Low transmission duty fator devices" of KDB 447498 D01 has been included.	Information requested.

This modification test report cancels and replaces the test report 56316RAN.002.

General description of the device under evaluation

The device under evaluation uses a combination of GPS, GSM and Bluetooth Low Energy hardware, in conjunction with a smartphone app, the Ping device provides the end user with the capability to track the location of people and valuables around the world.

The device has the capability of operating in Text Mode or Data Mode, depending of the mode the device will operate on GSM 850/1900 or UMTS II/V available network, using an Ublox SARA-U201 module.

As the device transmits only intermittently in data mode, and voice mode is not supported, guidance shown into KDB 447498 D01, section "6.3. Low transmission duty factor devices" has been followed in order to perform this assessment.

According to the manufacturer, in the Text Mode, the transmitter will send out a SMS each 18 ms. The 18 ms is 4 possible attepts at sending de SMS over the GSM mode. This is the highest transmit time the device would operate in Text Mode. The device is limited by the firmware to only allow a transmission once every 1 second. Therefore, the maximum duty cycle of this mode will be:

Duty cycle = Tx on/(Tx on+Tx off) = 18 ms/(18ms+1000ms) = 1.77 %

The SARA-U201 module has a maximum Tx power of 33 dBm in the 900 MHz band and 30 dBm for 1800 MHz band. GSM mode has an inherent 12.5% duty cycle. Taking in account the hardware transmission limitation, the maximum average TX power for the GSM modes will be:

850MHz: 1996 mW*0.125 = 249.5 mW * 0.0177 = 4.47 mW = 6.5 dBm

1900MHz: 1000 mW*0.125 = 125 mW * 0.0177 = 2.21 mW = 3.45 dBm

If the device uses Data Mode, the transmitter will send out a SMS in 120 ms. The 120 ms is 4 possible attepts at sending de SMS over the UMTS mode. This is the highest transmit time the device would operate in Data Mode. The device is limited by the firmware to only allow a transmission once every 5 second. Therefore, the maximum duty cycle of this mode will be:

Duty cycle = Tx on/(Tx on+Tx off) = 120 ms/(120ms+5000ms) = 2.34 %

The SARA-U201 module has a maximum Tx power of 24 dBm (251.2 mW) for the UMTS bands. As the device is limited to transmit once during 120 ms every 5 second, the maximum averaged TX power for the UMTS modes will be:

Band II: 252 mW * 0.0234 = 5.90 mW = 7.71 dBm

Band V: 252 mW * 0.0234 = 5.90 mW = 7.71 dBm

The device also supports Bluettoth LE transmission, the maximum output power value for the module and the maximum gain declared by the manufacturer are, 0.0 dBm and +2.0 dBi repectively.

Into the operational description document, the manufacturer declares that WWAN and Bluetooth LE simultaneous transmissions may occur only into specific scenarios, and that these transmissions are extremely brief.

Following guidance shown into KDB 447498 D01, section "4.1. General test requirements", paragraph c), "compliance for simultaneous transmission must be considered when the maximum duration of the overlapping transmissions, including network hand-offs, is greater than 30 seconds", therefore, according to the manufacturer's declaration, it can be considered that the device does not support simultaneous transmissions.

The equipment specifications declared by the manufacturer for each supported feature are:

Band (MHz)	Technology	Band	Maximum RF output power (mW)	Maximum RF output power (dBm)	Maximum antenna gain (dBi)	Average radiated power (E.I.R.P.) (dBm)
850	GSM	850	4.47	6.5	-5.0	1.50
1900	GSM	1900	2.21	3.45	-2.0	1.45
1900	WCDMA	II	5.90	7.71	-2.0	5.71
850	WCDMA	V	5.90	7.71	-2.0	5.71
2450	Bluetooth LE	ISM	1.0	0.0	+2.0	2.00

Table 1: Equipment specifications

Assessment summary

Radiofrequency radiation exposure limits			
FCC 47 CFR § 2.1093 & ISED RSS-102 Issue 5 (2015-03)			
Band (MHz)	**Technology**	**Band**	**VERDICT (Pass/Fail)**
850	GSM	850	Pass
1900	GSM	1900	Pass
1900	WCDMA	II	Pass
850	WCDMA	V	Pass
2450	Bluetooth LE	ISM	Pass

Table 2: Assessment summary

Appendix A – FCC RF Exposure

FCC Exposure evaluation portable or mobile devices

Human exposure to RF emissions from portable devices (47 CFR §2.1093), as defined by the FCC, must be evaluated with respect to the FCC-adopted limits for SAR. Evaluation of mobile devices, as defined by the FCC, may also be performed with respect to SAR limits, but in such cases it is usually simpler and more cost-effective to evaluate compliance with respect to field strength or power density limits. For certain devices that are designed to be used in both mobile and portable configurations similar to those described in 47 CFR §2.1091(d)(4), such as certain desktop phones and wireless modem modules, compliance for mobile configurations is also satisfied when the same device is evaluated for SAR compliance in portable configurations.

FCC SAR test exclusion considerations

According to FCC OET KDB 447498 D01 General RF Exposure Guidance:

Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition is satisfied.

- For distances ≤ 50 mm

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(*max. power of channel, including tune-up tolerance, mW*)/(*min. test separation distance, mm*)] · [√f(GHz)]

≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

Where

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table:

MHz	5	10	15	20	25	30	35	40	45	50	mm
150	39	77	116	155	194	232	271	310	349	387	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	164	192	219	246	274	
450	22	45	67	89	112	134	157	179	201	224	
835	16	33	49	66	82	98	115	131	148	164	
900	16	32	47	63	79	95	111	126	142	158	
1500	12	24	37	49	61	73	86	98	110	122	
1900	11	22	33	44	54	65	76	87	98	109	
2450	10	19	29	38	48	57	67	77	86	96	
3600	8	16	24	32	40	47	55	63	71	79	
5200	7	13	20	26	33	39	46	53	59	66	
5400	6	13	19	26	32	39	45	52	58	65	
5800	6	12	19	25	31	37	44	50	56	62	

Table 3: SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and ≤ 50 mm

- For distances > 50 mm

For 100 MHz to 6 GHz frequencies and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following:

1) [Power allowed at numeric threshold for 50 mm in table 1) + (test separation distance - 50 mm)·(f(MHz)/150)] mW, at 100 MHz to 1500 MHz

2) [Power allowed at numeric threshold for 50 mm in table 1) + (test separation distance - 50 mm)·10] mW, at > 1500 MHz and ≤ 6 GHz

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table

MHz	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	SAR Test Exclusion Threshold (mW)
150	387	397	407	417	427	437	447	457	467	477	487	497	507	517	527	
300	274	294	314	334	354	374	394	414	434	454	474	494	514	534	554	
450	224	254	284	314	344	374	404	434	464	494	524	554	584	614	644	
835	164	220	275	331	387	442	498	554	609	665	721	776	832	888	943	
900	158	218	278	338	398	458	518	578	638	698	758	818	878	938	998	
1500	122	222	322	422	522	622	722	822	922	1022	1122	1222	1322	1422	1522	
1900	109	209	309	409	509	609	709	809	909	1009	1109	1209	1309	1409	1509	
2450	96	196	296	396	496	596	696	796	896	996	1096	1196	1296	1396	1496	
3600	79	179	279	379	479	579	679	779	879	979	1079	1179	1279	1379	1479	
5200	66	166	266	366	466	566	666	766	866	966	1066	1166	1266	1366	1466	
5400	65	165	265	365	465	565	665	765	865	965	1065	1165	1265	1365	1465	
5800	62	162	262	362	462	562	662	762	862	962	1062	1162	1262	1362	1462	

Table 4: SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and > 50 mm

- For frequencies below 100 MHz

The following may be considered for SAR test exclusion:

1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by [1 + log(100/f(MHz))]

2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by ½

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table

MHz	< 50	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	237	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	mW
50	308	617	625	634	643	651	660	669	677	686	695	703	712	721	729	738	
10	474	948	961	975	988	1001	1015	1028	1041	1055	1068	1081	1095	1108	1121	1135	
1	711	1422	1442	1462	1482	1502	1522	1542	1562	1582	1602	1622	1642	1662	1682	1702	
0.1	948	1896	1923	1949	1976	2003	2029	2056	2083	2109	2136	2163	2189	2216	2243	2269	
0.05	1019	2039	2067	2096	2125	2153	2182	2211	2239	2268	2297	2325	2354	2383	2411	2440	
0.01	1185	2370	2403	2437	2470	2503	2537	2570	2603	2637	2670	2703	2737	2770	2803	2837	

Table 5: SAR Test Exclusion Thresholds for frequencies < 100 MHz

FCC Evaluation Results

Following guidance of KDB 447498 D01, section "6.3 Low transmission duty fator devices", SAR Test Exclusion Threshold condition for each supported transmitting technology has been evaluated for the duty factor adjusted maximum output power, using a conservative minimum test separation distance of 5 mm:

Technology	Max Declared Time Avg. Output Power (dBm)		Min. Test Distance (mm)	Freq. (GHz)	Result	Test Exclusion
	(dBm)	(mW)				
GSM 850	6.5	4.42	5	0.849	0.82	Pass
GSM 1900	3.45	2.21		1.91	0.61	Pass
WCDMA II	7.71	5.90		0.849	1.09	Pass
WCDMA V	7.71	5.90		1.91	1.63	Pass
Bluetooth LE	0.0	1.0		2.48	0.31	Pass

Table 6: Evaluation Result

The computed values are < 3.0, so according to KDB 447498 D01 – General RF Exposure Guidance, these modes qualify for Standalone SAR test exclusion for 1-g SAR and 10-g SAR.

Appendix B – ISED RF Exposure

ISED SAR test exclusion considerations

According to "RSS-102 Issue 5 (2015-03) – Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)", paragraph "2.5.1 Exemption Limits for Routine Evaluation – SAR Evaluation", the device operates below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1:

Table 1: SAR evaluation – Exemption limits for routine evaluation based on frequency and separation distance[4,5]

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm
≤300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW
835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

Output Power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based time-averaged output power. If the operating frequency of the device is between two frequencies lotaced in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required

ISED Evaluation Results

According to paragraph "2.5.1 Exemption Limits for Routine Evaluation – SAR Evaluation", the exemption limits for the applicable separation distance have been calculated by linear interpolation for the following operating frequencies:

Distance (mm)	Technology	Frequency (MHz)	Exemption Limits (mW)
5	GSM 850	824.2	17.98
		836.6	16.98
		848.8	16.87
	GSM 1900	1850.2	7.47
		1880.0	7.19
		1909.8	6.95
	WCDMA II	1850.0	7.47
		1880.0	7.19
		1910.0	6.95
	WCDMA V	826.4	17.78
		836.6	16.98
		846.6	16.89
	Bluetooth LE	2402	4.26
		2440	4.05
		2480	3.95

Table 7: Exemption Limits

The evaluation into the worst cases for the applicable maximum output power levels/maximum E.I.R.P and exemption limits for each operating frequency and technology will be as follow:

Technology	Frequency (MHz)	Max. RF output power/ Max. EIRP (dBm)	Max. RF output power/ Max. EIRP (mW)	ISED Exemption Limits (mW)	Verdict
GSM 850	848.8	6.5	4.47	16.87	Pass
GSM 1900	1909.8	3.45	2.21	6.95	Pass
WCDMA II	1910.0	7.71	5.90	6.95	Pass
WCDMA V	846.6	7.71	5.90	16.89	Pass
Bluetooth LE	2480.0	2.0	1.59	3.95	Pass

Table 8: Evaluation Result

As all operating frequencies comply with SAR Test Exclusion Thresholds, according to the standard "ISED RSS-102 Issue 5 (2015-03)", SAR testing is not required.