FCC §15.247 (i) &§1.1307 (b) (3) - RF EXPOSURE EVALUATION

Applicable Standard

According to subpart 15.247 (i) and §1.1307(b) (3), 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

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:

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

Where

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

and

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

d = the separation distance (cm);

Finally, when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

Result

For worst case:

Exemption limit:

For f=915.5MHz, d=0.5cm, the P_{th}=8.13mW

For limb-worn devices, the exemption limits= 2.5*8.13mW=20.33mW.

The higher of the available maximum time-averaged power or effective radiated power (ERP):

The antenna gain is 0.25dBi(-1.90dBd), 0dBd=2.15dBi

The maximum tune-up conducted power is 13.0dBm(19.95mW), which less than 20.33mW@915.5MHz exemption limit.

Note1: This device is a handheld device.

Note2:The BLE cannot transmit at the same time with the Lora.

So the stand-alone SAR evaluation can be exempted.