

RF Exposure evaluation

FCC ID : 2ATWO-GFM915A

IC ID:

1. Reference

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According to section 2.5.1 (Exemption from Routine Evaluation Limits – SAR Evaluation) of RSS-102 Issue 5. SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or 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

According to linear calculation

For 917MHz Exemption(≤5mm)=16.23mW

For 2480MHz Exemption(≤5mm)=3.94mW

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According to KDB447498 D01 General RF Exposure Guidance v06 Section 4.3.1 Standalone SAR test exclusion considerations: “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, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure

conditions.²² The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.²³ “

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot \sqrt{f \text{ (GHz)}} \leq 3.0$ 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
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

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 according to 5) in section 4.1 is applied to determine SAR test exclusion.

2. Result

The device is designed to be used in portable exposure conditions; the minimum distance used is 5mm and the output power measured, the conclusion can be obtained

Manufacturing tolerance

BLE(Output AV Power)			
Channel	Channel 00	Channel 39	Channel 78
Target (dBm)	-13	-13	-13
Tolerance \pm (dB)	1.0	1.0	1.0

Lora(Output AV Power)			
Channel	Channel 00	Channel 04	Channel 09
Target (dBm)	10.5	10.5	10.5
Tolerance \pm (dB)	1.0	1.0	1.0

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Modulation Type	f (MHz)	Max Output Power measured (dBm)	Max Output Power with Tune-Up (mW)	Limit (mW)	Results
BLE	2480	-13	0.050	3.94	Pass
Lora	917	10.5	11.22	16.32	Pass

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Evaluation Results

Band/Mode	f (MHz)	Antenna Distance (mm)	RF output power (including tune-up tolerance)		SAR Test Exclusion Threshold	SAR Test Exclusion
			dBm	mW		
BT	2480	5	-12	0.063	0.019 < 3.0	Yes
Lora	917	5	11.5	14.125	2.705 < 3.0	Yes

3. Conclusion

The SAR measurement is not required.