



中认信通
CHINA CERTIFICATION ICT CO., LTD (DONGGUAN)



RF EXPOSURE EVALUATION

Applicant: Xiamen Milesight IoT Co., Ltd.

Address: Building C09, Software Park Phase III, Xiamen 361024, Fujian, China

FCC ID: 2AYHY-VS135LORA

Product Name: Ultra ToF People Counter

**Standard(s): 47 CFR §1.1307, 47 CFR §2.1091
447498 D04 Interim General RF Exposure Guidance
v01**

The above device has been tested and found compliant with the requirement of the relative standards by China Certification ICT Co., Ltd (Dongguan)

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Reviewed By: Calvin Chen

Title: RF Engineer

Approved By: Sun Zhong

Title: Manager

Test Laboratory: China Certification ICT Co., Ltd (Dongguan)

No. 113, Pingkang Road, Dalang Town, Dongguan,
Guangdong, China
Tel: +86-769-82016888

Test Facility

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No. : 442868, the FCC Designation No. : CN1314.

Declarations

China Certification ICT Co., Ltd (Dongguan) is not responsible for the authenticity of any test data provided by the applicant. Data included from the applicant that may affect test results are marked with a triangle symbol “▲”. Customer model name, addresses, names, trademarks etc. are not considered data.

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	CR240102703-00F	Original Report	2024/3/14

1. RF EXPOSURE EVALUATION

1.1 Applicable Standard

According to §1.1307(b)(3)(ii)(B)

Simultaneous Transmission with both SAR-based and MPE-Based Test Exemptions

This case is described in detail in § 1.1307(b)(3)(ii)(B) and covers the situations where both SAR-based and MPE-based exemption may be considered for test exemption in fixed, mobile, or portable device exposure conditions. For these cases, a device with multiple RF sources transmitting simultaneously will be considered an RF exempt device if the condition of Formula (1) is satisfied.

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	$0.0128 R^2f$.
1,500-100,000	$19.2R^2$.

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

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using [paragraph \(b\)\(3\)\(i\)\(B\)](#) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using [paragraph \(b\)\(3\)\(i\)\(C\)](#) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

$P_{th,j}$ = the exemption threshold power (P_{th}) according to [paragraph \(b\)\(3\)\(i\)\(B\)](#) of this section for fixed, mobile, or portable RF source i .

ERP_j = the ERP of fixed, mobile, or portable RF source j .

$ERP_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source j , at a distance of at least $\lambda/2\pi$ according to the applicable formula of [paragraph \(b\)\(3\)\(i\)\(C\)](#) of this section.

$Evaluated_k$ = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

$Exposure Limit_k$ = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k , as applicable from [§ 1.1310 of this chapter](#).

1.2 Measurement Result

Radio	Frequency (MHz)	$\lambda / 2\pi$ (mm)	Distance (mm)	Exemption ERP (mW)	Maximum Conducted Power including Tune-up Tolerance (dBm)	Antenna Gain (dBi)	ERP	
							dBm	mW
Wi-Fi	2412-2462	19.80	200	768	19	1.45	18.30	67.61
Lora- FHSS	902.3-927.6	52.92	200	462	15	-0.35	12.50	17.78
Lora- DTS	903.-926.9	52.88	200	462	15	-0.35	12.50	17.78
5.8G SRD	5765.3	8.28	200	768	/	/	-4.3	0.37

Note:

1. The Maximum Conducted Power including Tune-up Tolerance was declared by manufacturer.
2. For SRD, This device maximum E-Field level is 93.05dB μ V/m at 3m, so the EIRP power is -2.15 dBm.
3. EIRP (dBm)=Field Strength of Fundamental(dBuV/m)-95.2
4. ERP (dBm)= EIRP (dBm)-2.15

The Wi-Fi, Lora and SRD can transmit simultaneously.

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

$$=ERP_{Wi-Fi} / ERP_{th} + P_{Lora} / ERP_{th} + P_{5.8G SRD} / ERP_{th}$$

$$=67.61/768 + 17.78/462 + 0.37/768$$

$$=0.127$$

$$< 1.0$$

Result: The device meet FCC MPE at 20 cm distance.

===== END OF REPORT =====