1. RF Exposure Requirements

1.1 General Information

Client Information

Applicant: Payment as a Service Corporation

Address of applicant: 2200 Kraft Dr Ste 1000 Blacksburg VA USA

Manufacturer: Shenzhen Itron Electronics co.,ltd.

Room A1208,Baohua Building Hua Qiang North Road Shenzhen Address of manufacturer:

518031,P.R.C

General Description of EUT:

Product Name: Card Reader

Trade Name /
Model No.: i9
Adding Model(s): /

Type-C Port:DC5V Rated Voltage:

Battery:DC3.7V

Capacity: 500mAh

Power Adapter: /

FCC ID: 2BG3A-ITI9
Equipment Type: Mobile device

Technical Characteristics of EUT:

Bluetooth

Bluetooth Version: V4.2 (BLE mode) Frequency Range: 2402-2480MHz

RF Output Power: 2.81dBm (Conducted)

Data Rate: 1Mbps
Modulation: GFSK
Quantity of Channels: 40
Channel Separation: 2MHz

Type of Antenna: PCB Antenna
Antenna Gain: -0.09dBi

NFC

Support Standards: NFC

Frequency Range: 13.56MHz

Max. Field Strength: 65.03dBuV/m (at 3m)

Antenna Type: PCB Antenna

Antenna Gain 0dBi

1.2 RF Exposure Exemption

According to §1.1307(b)(3) and KDB 447498 D04 Interim General RF Exposure Guidance v01, system operating under the provisions of this section shall be operating in a manner that the public is not exposed to radio frequency energy level in excess limit for maximum permissible exposure.

Option A: FCC Rule Part 1.1307 (b)(3)(i)(A):The available maximum time-averaged power is no more than 1mW, regardless of separation distance.

Option B: FCC Rule Part 1.1307 (b)(3)(i)(B): 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. P_{th} is given by:

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

Where

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

and

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

d = the separation distance (cm);

Option C: FCC Rule Part 1.1307 (b)(3)(i)(C): The minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters.

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 ² f				
1,500-100,000	19.2R ²				

For Multiple RF sources: FCC Rule Part 1.1307(b)(3)(ii):

- (A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required).
- (B) In the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

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

1.3 Calculated Result

Radio	Prediction	Output	Antenna	Duty	Tune-Up	ERP
Access	Frequency	Power	Gain	Cycle	Time-Averaged Power	ERP
Technology	(MHz)	(dBm)	(dBi)	(%)	(dBm)	(dBm)
Bluetooth	2402	2.81	-0.09	100	3.00	0.76
NFC	13.56	-30.23	0	100	-30.00	-32.15

Frequency	Option	Min. Distance	Max.	Power	Exposure Limit	Ratio	Result
(MHz)	Option	(cm)	(dBm)	(mW)	(mW)	Rallo	Pass/Fail
2402	В	0.5	3.00	2.00	2.788	0.72	Pass
13.56	В	0.5	-30.00	0.00	2997.21	0.01	Pass

Note: 1. Time-Averaged Power=Output Power * Duty Cycle; ERP= Time-Averaged Power+ Antenna gain-2.15dB

- 2. Option A, B and C refers as clause 1.2.
- 3. For option B, Max (time-averaged power, effective radiated power (ERP)) converts to Max. Power. For option C. ERP converts to Max. Power:
- 4. For option B, P_{th} (mW) converts to Exposure Limit (mW); For option C, ERP (W) converts to Exposure Limit (mW).
 - 5. Ratio= Tune-Up ERP (mW)/ Exposure Limit (mW)

Mode for Simultaneous Multi-band Transmission:

Radio Access	Potio 1	Ratio 2	Simultaneous	Limit	Result
Technology	Ratio 1		Ratio	Limit	Pass/Fail
Bluetooth + NFC	0.72	0.01	0.73	1	Pass

Result: Pass