# **RF Exposure evaluation**

## **1. RF Exposure evaluation for the applying LMA transmitter**

As shown below, the main antenna is built in the left top side of LCD and the auxiliary antenna is built in the top right side of LCD. The separation distances between those antennas and the human body are 20cm or more.

Therefore the applying LMA transmitter and the antenna system is categorized as a mobile device by FCC CFR 47 Section 2.1091.



#### [MPE evaluation]

The following table shows the highest conducted peak output power of the applying modular device measured with the host device, and the maximum peak antenna gains of the host device.

| Transmission mode | P: conducted peak output power | G: peak antenna gain |  |  |
|-------------------|--------------------------------|----------------------|--|--|
| 5.2GHz band OFDM  | 17.36 dBm (54.5 mW)            | + 2.15 dBi           |  |  |

With those results, the maximum power density at 20cm distance is calculated as follows.

| Transmission        | EIRP = P + G | EIRP | Max. power density                     |
|---------------------|--------------|------|--|
| mode                | (dBm)        | (mW) | S = EIRP/ $(4 \times 20^2 \times \pi)$ |
| 5.2GHz bnad<br>OFDM | 19.51        | 89.3 | 0.0178 mW/ cm <sup>2</sup>             |

Since the applying modular transmitter device does not function to emit the radio frequency from both diversity antennas simultaneously, the above result is the maximum value of RF exposure to the persons, and is far below the MPE limit (1.0 mW/  $cm^2$ ). Therefore the LMA transmitter meets the MPE requirements for general Population/Uncontrolled exposure.

### 2. RF Exposure evaluation for co-located Bluetooth transmitters

|                                  | FCC ID         | Grantee Name    | Granted Date                           | Output |
|----------------------------------|----------------|-----------------|--|--------|
| Built-in type<br>LMA transmitter | ANO20020100MTN | IBM Japan, Ltd. | Under inspection with this application | 2.5mW  |

The applying host device supports co-located Bluetooth device as follows.

#### Co-located Bluetooth options for ThinkPad X40 Series



The main and auxiliary antennas placed at LCD section of the host device (ThinkPad X40 Series) are assembled apart from the Bluetooth antenna shown in the previous page with 20 cm or more.

Therefore the RF exposure evaluation for the Bluetooth transmitter is allowed to be examined independently of the applying WLAN antennas. In other word, the SAR testing for the applying transmitter in co-locating with the Bluetooth option is not required thanks to the following reason.

Although when a customer operates the applying PC on his lap the sufficient separation distance (minimum 20cm) between the above Bluetooth antenna and his body (lap) can not be maintained, the footnote of the Section 3 in Supplement C to OET Bulletin 65 states:

"<sup>14</sup> ……… If a device, its antenna or other radiating structures are operating at closer than 2.5 cm from a person's body or in contact with the body, SAR evaluation may be necessary when the output is more than 50 – 100 mW, depending on the device operating configurations and exposure conditions."

The output power of the Bluetooth transmitter in the previous table does not exceed 5mW.

Therefore the transmitters also satisfies the RF exposure evaluation regarding CFR 47 Part 15.247(b)(4) without a SAR compliance test report, and can operate with the applying transmitter simultaneously.

IBM Web site guides customers about the **grant condition** concerning the co-located transmitter devices. See the next page.

## 3. IBM Web site for user's guidance concerning the co-located transmitters

Note) The info for the applying LMA transmitter is not available until the product announcement. http://www.pc.ibm.com/qtechinfo/MIGR-43693.html

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| Related links:  | Applicable countries/regio  | ans                |  |                       |        | 5    |  |
| Support phone list<br>Business Partner<br>support                       | United States<br>Service hints & tips<br>Affected configurations<br>Additional RF Option devices receive FCC certification for use on:  |                    |  |                       |        |      |  |
| 1BM Publications  | LMA (Limitted Modular<br>Approval Ladacters   | FCC IDs            | Approved<br>ThickPad models                    | multiple transmission |        |      |  |
| Center<br>Posto Postorio  |   |                    | P20 0  | #1                    | #2     | #3   |  |
| Find a Busness<br>Partner<br>IBM Supports<br>Microsoft Service<br>Packs | IBM High Rate Wireless<br>LAN Min PCI Adapter   | ANOM3AWEB560A      | R32 Series<br>T30 Series<br>)(30 Series (/30)  | NG                    | 0      | 0    |  |
|   | Cisco Aironet Wireless<br>802.11b   | ANOU58H804         | R32 Series<br>T30 Series<br>) 30 Series (\30)  | NB                    | 0      | 0    |  |
|   |   |                    | R40 Series<br>T40 Series<br>):30 Series ():31) | 0                     | 0      | 0    |  |
|   |   |                    | PS0 Series                                     | 0                     | NG     | 0    |  |
|   | Intel PRO/Wireless LAN<br>2100 3B Mini PCI Adapter  | AN020020201CLK     | R40 Series<br>T40 Series<br>) 30 Series 0(31)  | 0                     | 0      | 0    |  |
|   |   | 1                  | )(40 Series                                    | 0                     | NB     | NB   |  |
|   | For the second  |                    | R50 Series                                     | 0                     | NG     | 0    |  |
|   | IBM 11a/b/g Wireless<br>LAN Mini PCI Adapter  | ANC20030400LEG     | T40 Series<br>) 20 Series () 21)               | 0                     | 0      | 0    |  |
|   |   |                    | X40 Series                                     | 0                     | NG     | NG   |  |
|   | IBM High Rate Wireless  | ANO20020280BRX     | G40 Series                                     | NG                    | NG     | 0    |  |
|   | LAN Mini POI Adapter II   |                    | R40 Series                                     | 0                     | 0      | 0    |  |
|   | NOTES:         MB: Not authorized to use by the FCC rule, or not recognized by BIOS.         MI: FCO ID: ANO20020100MTN       Option Name: IBM Integrated Bluetooth with 56K Modem.         MI: FCO ID: PI4BT-ULTRA       Option Name: Bluetooth UltraPort Module from IBM.         MI: FCO ID: PI4BT-UETRA       Option Name: Bluetooth PC Card II         MD: FCO ID: PI4BT-IBM-PCI       Option Name: Bluetooth PC Card II         Solution       The supplementary document of ThinkPad's "Service and Troubleshooting Guide" has the following information in "Wireless regulatory information - USA Federal Communications Commission (FCC)" section:                       |                    |  |                       |        |      |  |
|   | <ul> <li>Please make sure of the following conditions on use of wireless features.</li> <li>1. Visit the IBM site at www.bm.com/pc/gtechinfo/MJ3R-43693.html and confirm the updated list of RF option devices that have been approved to cooperate with the integrated wireless feature.</li> <li>2. When you use any other RF option device that is not listed on the IBM site, all other wireless features including the integrated transmitter in your ThinkPad computer are required to be turned off.</li> <li>3. Users are requested to follow the RF Safety instructions on wireless option devices that are included in the RF option device's user's manual.</li> </ul> |                    |  |                       |        |      |  |
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