

RF Exposure statement

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To whom it may concern:

TÜV SÜD Zacta is authorized as an agency from **Applicant: Japan Radio Co Ltd. (FCC ID: CKEJRN-130K, IC: 768B-JRN130K)** to act on their behalf in all matters relating to applications for equipment authorization, including testing the device and the signing of all documents relating to these matters.

MAXIMUM PERMISSIBLE EXPOSURE

FCC RULES

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled Exposures				
0.3–3.0	614	1.63	*(100)	6
3.0–30	1842/f	4.89/f	*(900/f ²)	6
30–300	61.4	0.163	1.0	6
300–1500	f/300	6
1500–100,000	5	6
(B) Limits for General Population/Uncontrolled Exposure				
0.3–1.34	614	1.63	*(100)	30
1.34–30	824/f	2.19/f	*(180/f ²)	30

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)—Continued

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
30–300	27.5	0.073	0.2	30
300–1500	f/1500	30
1500–100,000	1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

NOTE 1 TO TABLE 1: Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or can not exercise control over their exposure.

IC RULES

IC Safety Code 6, Section 2.2.1 (a) A person other than an RF and microwave exposed worker shall not be exposed to electromagnetic radiation in a frequency band listed in Column 1 of Table 5, if the field strength exceeds the value given in Column 2 or 3 of Table 5, when averaged spatially and over time, or if the power density exceeds the value given in Column 4 of Table 5, when averaged spatially and over time.

Table 5
Exposure Limits for Persons Not Classed As RF and Microwave Exposed Workers (Including the General Public)

1 Frequency (MHz)	2 Electric Field Strength; rms (V/m)	3 Magnetic Field Strength; rms (A/m)	4 Power Density (W/m ²)	5 Averaging Time (min)
0.003–1	280	2.19		6
1–10	280/ <i>f</i>	2.19/ <i>f</i>		6
10–30	28	2.19/ <i>f</i>		6
30–300	28	0.073	2*	6
300–1 500	1.585 <i>f</i> ^{0.5}	0.0042 <i>f</i> ^{0.5}	<i>f</i> /150	6
1 500–15 000	61.4	0.163	10	6
15 000–150 000	61.4	0.163	10	616 000 / <i>f</i> ^{1.2}
150 000–300 000	0.158 <i>f</i> ^{0.5}	4.21 × 10 ⁻⁴ <i>f</i> ^{0.5}	6.67 × 10 ⁻⁵ <i>f</i>	616 000 / <i>f</i> ^{1.2}

* Power density limit is applicable at frequencies greater than 100 MHz.

Notes: 1. Frequency, *f*, is in MHz.
2. A power density of 10 W/m² is equivalent to 1 mW/cm².
3. A magnetic field strength of 1 A/m corresponds to 1.257 microtesla (μT) or 12.57 milligauss (mG).

CALCULATIONS

Given

$$E = \sqrt{(30 * P * G) / d}$$

and

$$S = E^2 / 3770$$

where

E = Field Strength in Volts/meter

P = Power in Watts

G = Numeric antenna gain

d = Distance in meters

S = Power Density in milliwatts/square centimeter

Combining equations, rearranging the terms to express the distance as a function of the remaining variables, changing to units of Power to mW and Distance to cm, and substituting the logarithmic form of power and gain yields:

$$d = 0.282 * 10^{((P + G) / 20)} / \sqrt{S}$$

where

d = MPE distance in cm

P = Power in dBm

G = Antenna Gain in dBi

S = Power Density Limit in mW/cm²

Rearranging terms to calculate the power density at a specific distance yields

$$S = 0.0795 * 10^{((P + G) / 10)} / (d^2)$$

The power density in units of mW/cm² is converted to units of W/m² by multiplying by a factor of 10.

LIMITS

From FCC §1.1310 Table 1 (B), the maximum value of S:

$$S (850\text{MHz}) = f/1500 = 824/1500 = 0.549 \text{ mW/cm}^2$$

$$S (1900\text{MHz}) = 1.0 \text{ mW/cm}^2$$

From IC Safety Code 6, Section 2.2 Table 5 Column 4, S:

$$S (850\text{MHz}) = f/150 = 824/150 = 5.49 \text{ W/m}^2$$

$$S (1900\text{MHz}) = 10 \text{ W/m}^2$$

RESULTS

(MPE distance equals 20 cm)

Mode	Band	MPE Distance (cm)	Output Power (dBm)	Antenna Gain (dBi)	FCC Power Density (mW/cm ²)	IC Power Density (W/m ²)
GSM850	850MHz	20.0	33.50	-0.58	0.39	3.89
WCDMA V	850MHz	20.0	24.00	-0.58	0.04	0.44
GSM1900	1900MHz	20.0	30.50	1.05	0.28	2.84
WCDMA II	1900MHz	20.0	24.00	1.05	0.06	0.64

NOTE: For mobile or fixed location transmitters, the minimum separation distance is 20 cm, even if calculations indicate that the MPE distance would be less.