Project #: PRJ0040425

Company: American Innovations

Models (HVINs): RM520C, RM540C

RF Exposure Evaluation Report

Prepared for:

American Innovations 12211 Technology Blvd. Austin, TX 78727

Ву

Nemko USA, Inc. 1601 North A.W. Grimes Blvd., Suite B Round Rock, Texas 78665

October 24, 2023

Written by

Larry Finn Laboratory Manager

Table of Contents

1.0 N	Maximum Permissible Exposure Evaluation (Supplements the test report.)	3
	Applicable Documents	
	Criteria	
	Report Summary	
	FCC RF Exposure Exemption	
	TCB Guidance for Collocate Radios Transmitting Simultaneously	
	FCC Collocation Evaluation	
	ISED RF Exposure Limits	
	ISED Collocation Evaluation	

NOTICE:

- (1) This Report must not be used to claim product endorsement, by ANAB, NIST, the FCC or any other Agency. This report also does not warrant certification by ANAB or NIST.
- (2) This report shall not be reproduced except in full, without the written approval of Nemko USA, Inc.
- (3) The significance of this report is dependent on the representative character of the test sample submitted for evaluation and the results apply only in reference to the sample tested. The manufacturer must continuously implement the changes shown herein to attain and maintain the required degree of compliance.

1.0 Maximum Permissible Exposure Evaluation (Supplements the test report.)

The measured power is considered for the intended use of the device and resulting RF exposure to the user.

1.1 Applicable Documents

Table 1.1.1: Applicable Documents

Document	Title
RSS-102 Issue 5 am1	Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
KDB 447498 D04 Interim General RF Exposure Guidance v01	RF EXPOSURE PROCEDURES AND EQUIPMENT AUTHORIZATION POLICIES FOR MOBILE AND PORTABLE DEVICES
OET Bulletin 65 Edition 97-01	Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields

1.2 Criteria

Section Reference	Test Detail		
FCC 47 CFR Part 1 I, 1.1310 //	Padiofroguency radiation exposure limits		
RSS-102, Issue 5 am1	Radiofrequency radiation exposure limits		

1.3 Report Summary

This report summarizes RF Exposure evaluation of collocated radios in the RM520C and RM540C device. The following two radios are collocated in the device:

BLE (2.4GHz) transmitter – FCC ID DJU626733, IC ID: 2466B-626733 Cellular Transmitter – FCC ID XMR202005BG95M5, IC ID: 10224A-2020BG95M5

The EUT is fixed when operated, with the user no closer than 20cm from the antenna during transmission. Worst case duty cycle operation and antenna gains were considered for this evaluation.

1.4 FCC RF Exposure Exemption

447498 D04 Interim General RF Exposure Guidance v01 was used as a basis for RF exposure requirements. The SAR-Based Exemption per 1.1307(b)(3)(i)(B) was considered for each radio based on the calculations below. Maximum power (P, EIRP) was obtained from the MPE and Test reports for each of the radios being considered. Table 1 below outlines the Maximum Permissible Exposure Limits (MPE).

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm²)	Averaging time (minutes)				
(i) Limits for Occupational/Controlled Exposure								
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				
300-1,500			f/300	<6				
1,500-100,000			5	<6				
	(ii) Lim	nits 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				
30-300	27.5	0.073	0.2	<30				
300-1,500			f/1500	<30				
1,500-100,000			1.0	<30				

Table 1: FCC Limits for RF Exposure

Threshold Power

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

Where:

$$x = - {\rm log_{10}}(\frac{60}{{\it ERP}_{20cm}\sqrt{f}}) \ where \ f \ is \ in \ {\it GHz}$$

ERP_{20cm} Calculation

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

$$Threshold \ ERP_W = \begin{cases} 1920R^2 \ for \ 0.3 \ MHz \leq f < 1.34 \ MHz \\ 3450 \frac{R^2}{f^2} \ for \ 1.34 \ MHz \leq f < 30 \ MHz \\ 3.83R^2 \ for \ 30 \ MHz \leq f < 300 \ MHz \\ 0.0128R^2 f \ for \ 300 \ MHz \leq f < 1500 \ MHz \\ 19.2R^2 \ for \ 1500 \ MHz \leq f < 100000 \ MHz \end{cases}$$

1.5 TCB Guidance for Collocate Radios Transmitting Simultaneously

For all transmitters that operate simultaneously, sum the following ratios of the individual transmitters:

- P / Pth for transmitters meeting exclusion thresholds of option B
- ERP / ERPth for transmitters meeting exclusion thresholds of option C
- RF Exposure measured value / RF Exposure limit for transmitters evaluated through measurement The total must be less than 1.0
 - If not then it will require measurements one or more of the excluded transmitters

1.6 FCC Collocation Evaluation

Radio	Band	Frequency	Conducted Power	Antenna Gain	P(EIRP)	Power Density	Uncontrolled PD Limit	P/P _{limit}
-	-	MHz	dBm	dBi	mW	mW/cm²	mW/cm²	-
XMR202005BG95M5	GSM 850	849	25.97	3.19	824.14	0.16	0.566	0.290
XMR202005BG95M5	GSM 1900	1900	22.97	1.59	285.76	0.06	1.000	0.057
XMR202005BG95M5	LTE Band 4	1700	25	2	501.19	0.10	1.000	0.100
XMR202005BG95M5	LTE Band 13	715	25	4.45	881.05	0.18	0.477	0.368
DJU-626733	2.4GHz	2400	13.826	1.7	35.69	0.01	1.000	0.007

Table 2: Worst-Case Collocation Radio Combination

The highlighted lines above in Table 2 represent the worst-case combination of simultaneously transmitting collocated radios.

Radio	XMR202005BG95M5	DJU626733	Total Exposure	Limit	Result
Band	LTE Band 13	WLAN 2.4GHz,	Ratio (TER)	Lillie	Nesuit
P/P _{limit}	0.368	0.007	0.375	1	Pass

Table 3: Total Exposure Ratio (TER)

Table 3 shows the summation of the exposure ratios (P/P_{limit}). The total summation of all P/P_{limit} values is < 1, as such, the device meets RF exposure requirements.

1.7 ISED RF Exposure Limits

For compliance to Canada, RF Exposure levels were evaluated against the limits se forth in RSS -102. Power Density limits were used per Table 4 of RSS-102. Each collocated radio was evaluated against the power density limit, and the ratio of power density to power density limits were summed. A total value of less than 1 is considered a passing result, as the total RF exposure is under the exemption limit.

Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m²)	Reference Period (minutes)
$0.003 - 10^{21}$	83	90	•	Instantaneous*
0.1-10	•	0.73/f	-	6**
1.1-10	$87/f^{0.5}$	-		6**
10-20	27.46	0.0728	2	6
20-48	58.07/ f 0.25	$0.1540/f^{0.25}$	$8.944/f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	$3.142 f^{0.3417}$	$0.008335 f^{0.3417}$	$0.02619f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	616000/ f ^{1.2}
150000-300000	$0.158 f^{0.5}$	4.21 x 10 ⁻⁴ f ^{0.5}	6.67 x 10 ⁻⁵ f	616000/ f 1.2

Note: f is frequency in MHz.

Table 4: RSS-102 RF Exposure Limits

1.8 ISED Collocation Evaluation

Radio	Band	Frequency	Conducted Power	Antenna Gain	P(EIRP)	Power Density	Uncontrolled PD Limit	P/P _{limit}
-	-	MHz	dBm	dBi	mW	W/m²	W/m²	-
10224A-2020BG95M5	GSM 850	849	25.97	3.19	824.14	1.64	2.629	0.624
10224A-2020BG95M5	GSM 1900	1900	22.97	1.59	285.76	0.57	4.559	0.125
10224A-2020BG95M5	LTE Band 4	1700	25	2	501.19	1.00	4.225	0.236
10224A-2020BG95M5	LTE Band 13	715	25	4.45	881.05	1.75	2.338	0.750
2466B-626733	2.4GHz	2400	13.826	1.7	35.69	0.07	5.348	0.013

Table 5: Worst-Case Collocation Radio Combination

The highlighted lines above in Table 5 represent the worst-case combination of simultaneously transmitting collocated radios.

Radio	10224A- 2020BG95M5	2466B- 626733	Total Exposure	Limit	Result
Band	GSM 850	WLAN 2.4GHz,	Ratio (TER)	2	
P/P _{limit}	0.624	0.013	0.637	1	Pass

Table 6: Total Exposure Ratio (TER)

Table 6 shows the summation of the exposure ratios (P/P_{limit}). The total summation of all P/P_{limit} values is < 1, as such, the device meets RF exposure requirements for ISED (Canada).

^{*}Based on nerve stimulation (NS).

^{**} Based on specific absorption rate (SAR)



End of Report