

### 7.3 MAXIMUM PERMISSIBLE EXPOSURE

#### LIMITS for FCC RF Exposure Evaluation

§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 <sup>2</sup> )	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 <sup>2</sup> )	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 <sup>2</sup> )	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 <sup>2</sup> )	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.

#### LIMITS for FCC SAR Evaluation

##### KDB 447498 D04 Interim General RF Exposure Guidance v01, section 2.1.3 SAR-Based Exemption:

“A more comprehensive exemption, considering a variable power threshold that depends on both the *separation distance* and power, is provided in § 1.1307(b)(3)(i)(B). This exemption is applicable to the frequency range between 300 MHz and 6 GHz, with *test separation distances* between 0.5 cm and 40 cm, and for all RF sources in fixed, mobile, and portable device exposure conditions.”

For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$

for 1-g SAR, and ≤ 7.5 for 10-g extremity SAR,  
 where f(GHz) is the RF channel transmit frequency in GHz

FCC KDB 447498 D01 General RF Exposure Guidance v06, section 4.3.1 & Appendix A provides the SAR Test Exclusion Thresholds (ERP/Condcuted) to verify that the device is exempt from 1-g extremity SAR at different separation distances.

Details in calculation formula for reference, given in § 1.1307(b)(3)(i)(B) to calculate the exemption:

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

Where

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

and

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

$d$  = the separation distance (cm);

**LIMITS per ISED RSS-102, Section 2.5 & Table 1**

**Per 2.5.1 Exemption Limits for Routine Evaluation — SAR Evaluation**

Table 1: SAR evaluation – Exemption limits for routine evaluation based on frequency and separation distance<sup>4,5</sup>

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm
≤300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW
835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5.

Example: Exclusion Thresholds to verify that the device is exempt from 1-g SAR at separation distance of ≤5 mm: For 900MHz Tx: 16mW (12dBm); For 2450MHz Tx: 4mW (6dBm).

**Per 2.5.2 Exemption Limits for Routine Evaluation – RF Exposure Evaluation**

- RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:
- below 20 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
  - at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $4.49/f^{0.5}$  W (adjusted for tune-up tolerance), where  $f$  is in MHz;
  - at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
  - **at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $1.31 \times 10^{-2} f^{0.6834}$  W (adjusted for tune-up tolerance), where  $f$  is in MHz;**
  - at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

**Summary**

For FCC and IC, that max. declared power level can be modified by any duty cycle over the time averaging period. Time-averaging period is a time period not to exceed 30 minutes for fixed RF sources or a time period inherent from device transmission characteristics not to exceed 30 minutes for mobile and portable RF sources.

For rf exposure, the averaging period is 6 minutes for ISED Canada and for FCC it varies by frequency but 1~60 second for RF exposure or the period specified by product design spec. for RF exposure can be used.

So the power value for RF exposure= Declared power x Duty Cycle factor

### CALCULATIONS for MPE distance and Power Density

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 and rearranging the terms to express the distance as a function of the remaining variables yields:

$$d = \sqrt{((30 * P * G) / (3770 * S))}$$

Changing to units of Power to mW and Distance to cm, using:

$$P(\text{mW}) = P(\text{W}) / 1000 \text{ and}$$

$$d(\text{cm}) = 100 * d(\text{m})$$

yields

$$d = 100 * \sqrt{((30 * (P / 1000) * G) / (3770 * S))}$$

$$d = 0.282 * \sqrt{(P * G / S)}$$

where

d = distance in cm

P = Power in mW

G = Numeric antenna gain

S = Power Density in mW/cm<sup>2</sup>

Substituting the logarithmic form of power and gain using: P

$$(mW) = 10^{(P(\text{dBm}) / 10)} \text{ and}$$

$$G(\text{numeric}) = 10^{(G(\text{dBi}) / 10)}$$

yields

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

Equation (1)

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

Equation (2)

where

d = MPE distance in cm

P = Power in dBm

G = Antenna Gain in dBi

S = Power Density Limit in mW/cm<sup>2</sup>

Equation (1) and the measured Output power is used to calculate the MPE distance.

Equation (2) and the measured Output power is used to calculate the Power density.

## APPLICABLE LIMITS

**RF Expoure** for separation  $\geq 20\text{cm}$

FCC: From §1.1310 Table 1 (B), for Public  $S = 1.0 \text{ mW/cm}^2$  ; for Professional,  $S = 5.0 \text{ mW/cm}^2$   
IC: With formula of  $1.31 \times 10^{-2} f^{0.6834} \text{ W}$ , more restricted EIRP limit value are 1.37W at 902MHz,  
2.67W at 2400MHz.

**SAR Exclusion Thresholds** for separation of  $>5\sim 40\text{cm}$ :

FCC : Use Formular in FCC § 1.1307(b)(3)(i)(B) & KDB 447498 D04. Calculated  $P_{th} = 10.32\text{mW}$  at 10mm distance for 2.4GHz ISM Band device.

IC: Use RSS-102 Table1  
Apply duty cycle factor & 2.5 factor for extremity or limb-worn devices: The power limit is  $7 \times 2.5 = 17.5\text{mW}$  for separation distance of 10 mm in 2.4GHz ISM band.

## RESULTS

No non-compliance noted:

For Hand-held /limb-worn usage: **SAR Exemption Evaluation Limit** (2.5 factor with 10-g extremity SAR) is  $7 \times 2.5 = 17.5\text{mW}$  for separation distance of 10 mm for 2.4GHz band.

EUT frequency band: 2.405-2.480GHz

Duty Cycle: Based on EUT design document, total duty cycle factor (DCF) is 20.87%.

---For FCC,  $P_{conducted} = 15\text{mW}$ . With DCF, it is  $3.13\text{mW} < 10.32\text{mW}$ ;

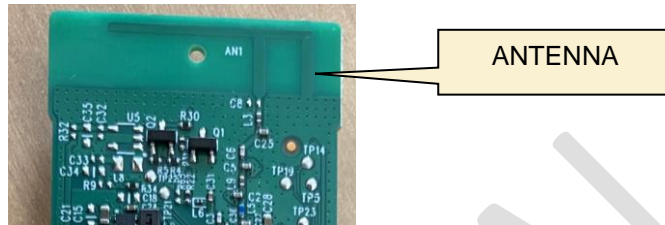
--- For IC,  $\text{EIRP} = 59\text{mW}$ . With DCF, it is  $12.3\text{mW} < 17.5\text{mW}$ .

According to the product design, minimum 10mm distance from antenna to user's hand/wrist is also well kept.

**Therefore, EUT design & power meets this 10mm minimum separation requirement for SAR test exclusion.**

## 13 Distance between antenna and user's finger

### 13.1 Location of the antenna



The antenna is on the opposite side of the buttons.

### 13.2 Normal use in the hand

