Compliance with 47 CFR 15.247(i)

> "*Systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines. See § 1.1307(b)(1) of this chapter*."

The EUT is a Netguard Access Point transceiver that operates in the 2400-2483.5MHz band. The Netguard Access Point will only be used with a separation distance of 20 centimeters or greater between the antenna and the body of the user or nearby persons and can therefore be considered a mobile transmitter per 47 CFR 2.1091(b). The Access Point has a single antenna: Telex 2405AA 2.4GHz, circularly polarized, ceramic patch antenna. The antenna is enclosed in the plastic housing of the device and has a maximum gain of 5 dBic (2dBi). The maximum peak conducted output power is 0.232 mW.

The maximum peak power is 0.737 mW (EIRP) for FCC ID: .DXXNG1400AP. The EUT is not subject to routine environmental evaluation per 47 CFR 2.1091(c). Per 47 CFR 1.1310, the EUT must meet the General Population / Uncontrolled Exposure limits listed in Table 1.

The MPE estimates are as follows:

Table 1 in 47 CFR 1.1310 defines the maximum permissible exposure (MPE) for the general population as 1 mW/cm^2 for frequencies greater than 1500MHz. The exposure level at a 20 cm distance from the EUT's transmitting antenna is calculated using the general equation:

$S = (PG)/4\pi R^2$
Where: S = power density (mW/cm^2)
P = power input to the antenna (mW)
G = numeric power gain relative to an isotropic radiator
R = distance to the center of the radiation of the antenna (20 cm = limit for MPE estimates)
PG = EIRP

Solving for S, the maximum power density 20 cm from the transmitting antenna is summarized in the following table:

MPE Estimate

FCC ID: DXXNG1400AP

Antenna Type	Antenna Manufacturer	Antenna Part No.	Transmit Frequency (MHz)	Max Peak Conducted Output Power (mW)	Antenna Gain (dBi)	Minimum Antenna Cable Loss (dB)	Power Density @ 20 cm (mW/cm^2)	General Population Exposure Limit from 1.1310 (mW/cm^2)
Ceramic Patch	Telex	2405AA	2400	0.232	2	0.5	0.000065	1

The power density does not exceed 1 mW/cm^2 at 20 cm; therefore, the exposure condition is compliant with FCC rules.

The applicant's radio, FCC ID: DXXNG1400AP, is compliant with the requirements of 15.247(i).