

MAXIMUM PERMISSIBLE EXPOSURE ADDENDUM REPORT TO 98384-9 (Measurement)

FOR THE

Device: SRR+RV50WWAN+WIFI+GPSRx Models: CCU100B, CCU100B Repeater, CCU100RB, CCU100RB Repeater & CCU100TB

Report No.: 98384-9A

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The test data contained in this report documents the observed testing parameters pertaining to and are relevant for only the sample equipment tested in the agreed upon operational mode(s) and configuration(s) as identified herein. Compliance assessment remains the client's responsibility. This report may not be used to claim product endorsement by A2LA or any government agencies. This test report has been authorized for release under quality control from CKC Laboratories, Inc.

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Steve Behm Director of Quality Assurance & Engineering Services CKC Laboratories, Inc.

Revision History

Addendum A: To revise statements in Device and Antenna Configuration and Other Considerations for purpose of assessment. Also, revised tables for MPE Measurements for Static Fields (Free Space Configuration).

Purpose:

To demonstrate compliance with United States, Canada, Australia and/or European Union RF Exposure requirements for Mobile Equipment (devices used >20cm from the body), where MPE measurements apply.

Manufacturer's Model Equivalency Statement:

The following models were tested by CKC Laboratories: **CCU100B, CCU100RB, CCU100TB**

The manufacturer states that during previous testing it was found that the two devices with a cellular modem had a much worse emissions profile than without a cellular modem in the device. The difference between the repeater versions of these devices and the non-repeater versions is that the repeater versions do not have a cellular modem in them. Therefore, the manufacturer claims that any difference between the following devices without modem in them do not affect their EMC characteristics, and therefore meet the level of testing equivalent to the tested models: **CCU100B Repeater and CCU100RB Repeater**

For the CCU family, these have the same ISM transmitter as what was tested, except they have a Tx/Rx switch with more loss. So the CCUB tested would be worse case, less attenuation to the antenna. For the CCUA family, these have the identical ISM transmitter as what was tested. Therefore, the manufacturer claims that any difference between the following devices do not affect their EMC characteristics, and therefore meet the level of testing equivalent to the tested models:

CCU100, CCU100R, CCU100 Repeater, CCU100R Repeater, CCU100A, CCU100AR, CCU100A Repeater and CCU100AR Repeater.

Device and Antenna Operating Configuration:

Device operating at maximum output power with continuous transmission of modulated data. Assessment includes all transmitters included in the EUT, including the Itron ISM radio, WiFi and cellular module. The cellular module certification numbers are: FCC ID: N7NMC7355 and IC: 2417C-MC7355

Test Procedure:

This equipment is evaluated in accordance with the guidelines set forth in KDB 447498 & ANSI C95.1 for the US, Health Canada Safety Code 6 & RSS 102 for Canada. Single point measurement used, representing conservative worst-case assessment.

Other Considerations:

Report considers stand-alone configuration only. RF Exposure limits are calculated at the mid-point of each operating band. Multi-transmitter devices are assumed to permit simultaneous transmission, unless indicated otherwise. Simultaneous transmissions aggregated providing a worst case assessment. To provide a conservative, worst case assessment, the highest output power modes were utilized for testing and the limits selected were those using the lowest limit¹.

Referenced Test Reports:

None

¹ See appendix B

MPE Measurements

Operational Details (Attached 915MHz, Attached WAN)							
Power Reported is:	🛛 Peak 🗆 A	verage					
Limit Used is:	🖾 General P	opulation 🗆 Oo	cupational Exp	oosure			
Operating Band MHz	Power dBm						
915MHz	29.7	5.15	34.85	Yes	Monopole (attached)		
850/1800MHz (WAN)	33 (850MHz) 30 (1800MHz)	2	35 (850MHz) 32 (1800MHz)	Yes	Monopole (attached)		
2400MHz (Wifi)	21	0.5	21.5	Yes	Ceramic Board mount Antenna		

	Operational Details (Remote 915MHz, Attached WAN)						
Power Reported is:	🛛 Peak 🗆 A	verage					
Limit Used is:	🛛 General P	opulation 🗌 Oo	cupational Exp	oosure			
Operating Band MHz	Power dBm	Power Ant EIRP TX Antenna Con					
915MHz	29.7	6.15dBi (8.15dBi with 2dB attenuator)	35.85	Yes	Monopole (remote via cable)		
850/1800MHz (WAN)	33 (850MHz) 30 (1800MHz)	2	35 (850MHz) 32 (1800MHz)	Yes	Monopole (attached)		
2400MHz (Wifi)	21	0.5	21.5	Yes	Ceramic Board mount Antenna		

	Operational Details (Remote 915MHz, Remote WAN)						
Power Reported is:	🛛 Peak 🗆 A	🛛 Peak 🗆 Average					
Limit Used is:	🛛 General P	opulation 🗆 Oc	cupational Exp	posure			
Operating Band MHz	Power dBm						
915MHz	29.7	6.15dBi (8.15dBi with 2dB attenuator)	35.85	Yes	Monopole (remote via cable)		
850/1800MHz (WAN)	33 (850MHz) 30 (1800MHz)	3.5dBi (850MHz) 4.5dBi (1800MHz)	36.5 (850MHz) 34.5 (1800MHz)	Yes	Monopole (remote via cable)		
2400MHz (Wifi)	21	0.5	21.5	Yes	Ceramic Board mount Antenna		

Operational Details (Attached 915MHz, Remote WAN)							
Power Reported is:	🛛 Peak 🗆 A	verage					
Limit Used is:	🛛 General P	opulation 🗆 Oo	cupational Exp	oosure			
Operating Band MHz	Power dBm						
915MHz	29.7	5.15	34.85	Yes	Monopole (attached)		
850/1800MHz (WAN)	33 (850MHz) 30 (1800MHz)	3.5dBi (850MHz) 4.5dBi (1800MHz)	36.5 (850MHz) 34.5 (1800MHz)	Yes	Monopole (remote via cable)		
2400MHz (Wifi)	21	0.5	21.5	Yes	Ceramic Board mount Antenna		

Test Equipment							
Asset	Description	Manufacturer	Model	Cal Date	Cal Due		
03450	Field Monitor	ETS Lindgren	HI-6100	5/20/2015	5/20/2017		
03452	Field Probe	ETS-Lindgren	HI-6153	5/28/2015	5/28/2017		

MPE Measurements for Static Fields (Free Space Configuration)

For equipment where the fields are invariant in time, measurements are performed at a fixed height between 1.0m to 1.8mrepresenting worst case measurements as determined by preliminary assessment.

Configuration	Distance (m)	Height (m)	Measured Exposure W/m ²	Limit W/m ²	Result
Attached 915MHz, Attached WAN	0.2	1.4	1.7	2.3	Pass
Remote 915MHz, Attached WAN	0.2	1.0	0.6	2.3	Pass
Remote 915MHz, Remote WAN	0.2	1.2	0.3	2.3	Pass
Attached 915MHz, Remote WAN	0.2	1.4	2.1	2.3	Pass

MPE Single Point Assessment - Canada

Note: WAN 850MHz and 1800MHz investigated, worst case reported against lowest limit.

MPE Measurements for Static Fields (Free Space Configuration)

For equipment where the fields are invariant in time, measurements are performed at a fixed height between 1.0m to 1.8mrepresenting worst case measurements as determined by preliminary assessment.

Configuration	Distance (m)	Height (m)	Measured Exposure mW/cm ²	Limit mW/cm ²	Result
Attached 915MHz, Attached WAN	0.2	1.4	0.17	0.47	Pass
Remote 915MHz, Attached WAN	0.2	1.0	0.06	0.47	Pass
Remote 915MHz, Remote WAN	0.2	1.2	0.03	0.47	Pass
Attached 915MHz, Remote WAN	0.2	1.4	0.21	0.47	Pass

MPE Single Point Assessment - US

Note: WAN 850MHz and 1800MHz investigated, worst case reported against lowest limit.

Summary:

MPE Measurement Results:

Equipment demonstrating compliance with MPE measurement have been evaluated for use under mobile RF exposure configurations as identified herein. Additional configurations including collocation or simultaneous transmission with other transmitters (including necessary separation distances) are subject to further assessment. It is assumed that the manufacturer shall design the equipment such that the minimum separation distance of 20cm (or greater, as listed above) is met or that the manufacturer provides a protection guide (e.g. installation instructions) to the end user such that the antenna(s) may be installed in accordance with the manufacturer's instructions in such a manor to maintain the minimum separation distance.

General Comments:

The absorption and distribution of Electromagnetic energy in the body is a very complex phenomena that depends on the mass, shape and physiological condition of the body; the orientation of the body with respect to the fields; and, the electrical properties of the body and the environment. Variables that may play a substantial role in possible biological effects are those that characterize the environment (including but not limited to: ambient temperature, air velocity, relative humidity and body insulation); and those that characterize the individual (including but not limited to: age, gender, activity level and existing debilitation or disease). Because innumerable factors may interact to determine specific biological effects of exposure to electromagnetic fields, any protection guide should consider both intended and unintended operational environments and provide guidance for installation and use of the product such that proper separation distances can be maintained. (ANSI C95.1)

APPENDIX A - Assessment Procedure

TEST CONFIGURATION

The EUT antenna is placed in a configuration typical of normal installation. Where antenna mounting is required, non-conductive materials are used for support structures. In the special case of magnetically mounted vehicle antennas, a reference ground plane is used to simulate actual installation. In order to limit external interference effects, the test is performed in a semi-anechoic chamber. The EUT equipment is setup in a configuration representative of normal use. Support equipment for the measurement instruments are located outside of the testing area.

TEST PROCEDURE

Measurements are performed using a broadband detector with three orthogonal measurement axes. Values recorded are RMS based on the maximum measurements. To determine the direction of the maximum measurement, the detector is moved throughout the RF field generated by the transmit antenna. The detector is positioned at a minimum of 12 radials and at varying distances from the antenna along each radial. The area of maximum RF energy determined during preliminary investigation shall be used for the remainder of the tests. In the case where a transmitter may have multiple frequency bands, the preliminary investigation shall be repeated for each band.

For time varying fields, the appropriate averaging time is used. For spatially uniform fields, the measurement height is selected based on maximum preliminary measurements.

For spatially non-uniform fields (e.g. distances close to a magnetically mounted vehicle antenna), spatial averaging may be performed. The method for performing spatially averaged measurements is as follows:

- 1. Determine the direction of the maximum measurement.
- 2. At a specific distance measure vertically from the floor 5 points comprising a linear cross section of an adult human body, beginning at 0.2m and at each 40cm up to 1.8m.
- 3. Calculate the average of the measurements and compare with the established limit.

Since the applicable limits exist in several different measurement units, the following outlines the most common calculations used for determining the spatially averaged field.

Case 1: Where limits are applied in electric field strength (V/m), the spatially averaged electric field strength along a grid of n points is calculated using:

$$E = \left[\frac{1}{n}\sum_{i=1}^{n}E_{i}^{2}\right]^{\frac{1}{2}}$$

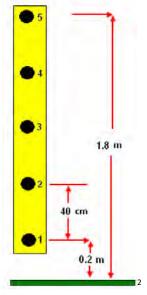
Case 2: Where limits are applied in units of power density (mW/cm²), assuming measurements are made in the far field, where the E and H vectors are mutually orthogonal, power density is first calculated using:

$$S = \frac{E^2}{3770}$$

And the spatially averaged power density along a grid of n points is calculated using:

$$S = \frac{1}{n} \sum_{i=1}^{n} S_i$$

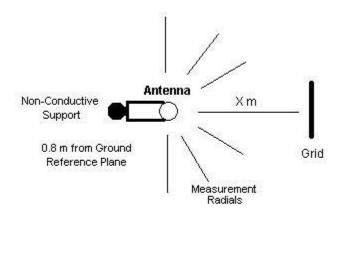
Page 7 of 16 Report No: 98384-9A The following diagram is an example of the grid used to perform local measurements for RF exposure evaluation over a whole-body spatial average.



The following diagram is an example of the setup used for most tests, excluding magnetically mounted vehicle antennas.

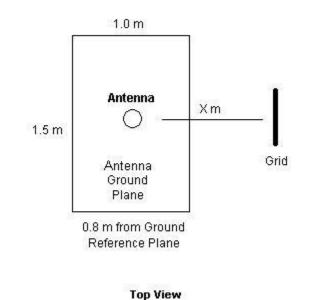
Setup Used for RF Evaluation Measurements

(excluding magnetically mounted vehicle antennas)



Top View

The following diagram is an example of the setup used for vehicle-mounted antennas. In the case where vehicle glass mounted antennas are used, this setup shall not apply. The letter X represents the test distance used for RF exposure measurements. The distance X is measured from the phase center of the transmitting antenna to the volumetric center of the measurement instrument. In order to more accurately simulate normal installation, the antenna ground plane is not bonded to the ground reference plane. The transmitting antenna is placed in the center of the antenna ground plane.



Setup Used for Vehicle-Mounted Antennas

APPENDIX B - RF Exposure Limits

United States Compliance Requirements (1.1310):

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
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	6
300-1500			f/300	6
1500-100,000			5.0	6

RF Exposure Evaluation Limits Occupational / Controlled Exposure

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
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
300-1500			f/1500	30
1500-100,000			1.0	30

* Plane wave equivalent power density

Limit is calculated based on the mid-band frequency used in the operating frequency range.

Stand-Alone Evaluation Exemption Levels:

In accordance with KDB 447498 D01 v05r02

	Max Output Power at Exemption Limit (mW)				
Frequency (MHz)	d ≤ 50mm	50mm < d ≤ 20cm			
<100	$\frac{1}{2} \cdot \left(\frac{R \cdot 50}{\sqrt{0.1}}\right) \cdot \left(1 + LOG\left(\frac{100}{f_{MHz}}\right)\right)$	$\left(\frac{R \cdot 50}{\sqrt{0.1}} + (d - 50)\frac{100}{150}\right) \cdot \left(1 + LOG\left(\frac{100}{f_{MHz}}\right)\right)$			
100-1500	$\left(\begin{array}{c} R \cdot d \end{array} \right)$	$\left(\frac{R\cdot 50}{\sqrt{f_{GHz}}} + (d-50)\frac{f_{MHz}}{150}\right)$			
1500-6000	$\left(\sqrt{f_{GHz}}\right)$	$\left(\frac{R\cdot 50}{\sqrt{f_{GHz}}} + (d-50)\cdot 10\right)$			

R is the allowed ratio: 3 for 1-g SAR and 7.5 for 10-g extremity SAR. *d* is distance in mm, rounded to the nearest mm.

Canadian Compliance Requirements (RSS-102):

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)			
0.003-10	170	180		Instantaneous			
0.1-10		1.6 / f		6			
1.29-10	193 / f ^{0.5}			6			
10-20	61.4	0.163	10	6			
20-48	129.8 / f ^{0.5}	0.3444 / f ^{0.25}	44.72 / f ^{0.5}	6			
48-100	49.33	0.1309	6.455	6			
100-6000	15.60 f ^{0.25}	0.04138 f ^{0.25}	0.6455 f ^{0.5}	6			
6000-15000	137	0.364	50	6			
15000-150,000	137	0.364	50	616000/ f ^{1.2}			
150,000-300,000	0.354 f ^{0.5}	9.40x10 ⁻⁴ f ^{0.5}	3.33x10⁻⁴ f	616000/ f ^{1.2}			

RF Exposure Evaluation Limits Occupational / Controlled Exposure:

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)		
0.003-10	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}	0.02619 f ^{0.6834}	6		
6000-15000	61.4	0.163	10	6		
15000-150,000	61.4	0.163	10	616000/ f ^{1.2}		
150,000-300,000	0.158 f ^{0.5}	4.21x10 ⁻⁴ f ^{0.5}	6.67x10⁻⁵ f	616000/ f ^{1.2}		

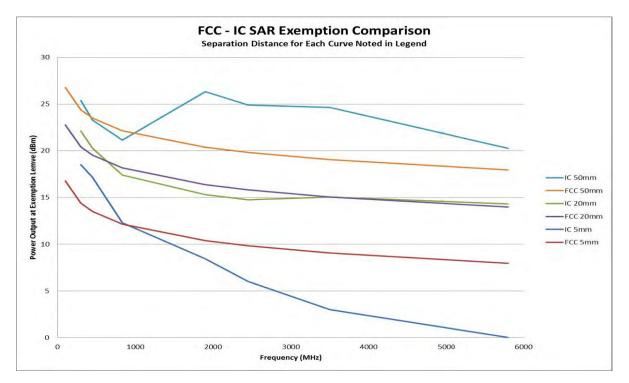
Stand-Alone Evaluation Exemption Levels:

	Exemption Limits (mW) at Separation Distance (mm)									
Freq(MHz)	≤5	10	15	20	25	30	35	40	45	≥50
≤300	71	101	132	162	193	223	254	284	315	345
450	52	70	88	106	123	141	159	177	195	213
835	17	30	42	55	67	80	92	105	117	130
1900	7	10	18	34	60	99	153	225	316	431
2450	4	7	15	30	52	83	123	173	235	309
3500	2	6	16	32	55	86	124	170	225	290
5800	1	6	15	27	41	56	71	85	97	106

Stand-Alone Evaluation Exemption Levels:

Frequency (MHz)	RF Exposure Exemption Limit (mW)
<20	1000
20-48	22480 / f ^{0.5}
48-300	600
300-6000	1310 f ^{0.6834}
≥6000	5000

General³ Comparison of FCC and IC Exemption Limits



Australian Radiation Protection and Nuclear Safety Agency Requirements (ARPANSA):

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)		
0.1 - 1.0	614	1.63/f		6		
1.0-10	614/f	1.63/f	1000/f ²	6		
10-400	61.4	0.163	10	6		
400-2000	3.07 * f ^{0.5}	0.00814 * f ^{0.5}	f/40	6		
2000-10,000	137	0.36	50	6		
10,000 - 300,000	137	0.36	50	9.6x10 ⁴ / f ^{1.05}		

RF Exposure Evaluation Limits Occupational / Controlled Exposure:

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m ²)	Averaging Time (minutes)
0.10-0.15	86.8	4.86		6
0.150-1.0	86.8	0.729/f		6
1.0-10	86.8/f ^{0.5}	0.729/f		6
10-400	27.4	0.0729	2	6
400-2000	1.37 f ^{0.5}	0.00364*f ^{0.5}	f/200	6
2000-10,000	61.4	0.163	10	6
10,000 - 300,000	61.4	0.163	10	9.6x10 ⁴ / f ^{1.05}

*Power density limit applicable >100MHz

Stand-Alone Evaluation Exemption Levels:

Occupational Exposure: 100mW Portable - General Public: 20mW Mobile – General Public: Separation distance >20cm and power < ARPANSA RPS3 Table S2 Or according to ARPANSA RPS3 Table S1

Table S2				
Operating Frequency	Nominal Mean Power Output			
(MHz)	(W)			
0.1-450	7			
450-2500	3150 / f			

European Union Compliance Requirements (ICNIRP):

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)
0.00082-0.065	610	24.4		6
0.065-1.0	610	1.6/f		
1.0-10	610/f	1.6/f		6
10-400	61	0.16	10	6
400-2000	3.0 * f ^{0.5}	0.008 * f ^{0.5}	f/40	6
2000-300,000	137	0.36	50	6

RF Exposure Evaluation Limits Occupational / Controlled Exposure:

RF Exposure Evaluation Limits General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (W/m²)	Averaging Time (minutes)
0.003-0.150	87	5.0		6
0.150-1.0	87	0.73/f		6
1.0-10	87/f ^{0.5}	0.73/f		6
10-400	28	0.073	2	6
400-2000	1.375 f ^{0.5}	0.0037*f ^{0.5}	f/200	6
2000-300,000	61	0.16	10	6

*Power density limit applicable >100MHz

Stand-Alone Evaluation Exemption⁴ Levels:

Head / Body: 20mW Extremity: 40mW

⁴ EN 62479 Annex A, General Public

Limit Calculations for RF Exposure Assessment shown above:

Frequencies shown include all bands of operation for incorporated transmitters						
Start Frequency (MHz)	Stop Frequency (MHz)	Mid Band Frequency (MHz)	US / FCC Power Density (mW/cm²)	Canada / ISED Power Density (W/m²)		
704	716	710.0	0.47*	2.3*		
777	787	782.0	0.52	2.5		
817	824	820.5	0.55	2.6		
824	849	836.5	0.56	2.6		
903	926.9	914.95	0.6	2.8		
1710	1755	1732.5	1.0	4.3		
1850	1910	1880.0	1.0	4.5		
1850	1915	1882.5	1.0	4.5		
2412	2462	2437.0	1.0	5.4		

Limits Calculated for Assessment Frequencies shown include all bands of operation for incorporated transmitters

*Worst case limit used for assessment.

APPENDIX C - References

- 1. ACMA Radiocommunications (Electromagnetic Radio Human Exposure) Standard, 2014.
- 2. AS/NZS 2772.2, Radiofrequency fields Principles and method of measurement and computation 3 kHz to 300 GHz, 2011.
- 3. Australian Radiation Protection and Nuclear Safety Agency, ARPANSA RPS 3, <u>Maximum Exposure Levels to</u> <u>Radiofrequency Fields 3 kHz to 300 GHz</u>, 2002 (&Errata, 2003).
- 4. New Zealand Standard, NZS 2772.1, <u>Radiofrequency Fields Part 1: Maximum Exposure Levels 3 kHz to 300</u> <u>GHz</u>, 2009.
- 5. Federal Communications Commission Knowledge Database (KDB) Publication 447498, "What are the RF exposure requirements and procedures for mobile and portable devices?" As in effect on the issue date of this report.
- 6. Title 47 Code of Federal Regulations, Part 1.1310, "Radiofrequency radiation exposure limits." As in effect on the issue date of this report.
- 7. Title 47 Code of Federal Regulations, Part 2.1091, "Radiofrequency radiation exposure evaluation: mobile devices." As in effect on the issue date of this report.
- 8. ANSI C95.1 (2005) <u>IEEE Standard for Safety Level with Respect to Human Exposure to Radio Frequency</u> <u>Electromagnetic Fields, 3kHz to 300 GHz</u>, 2005.
- 9. Health Canada Safety Code 6 Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz, 2015.
- 10. Industry Canada GL-01 <u>Guidelines for the Measurement of Radio Frequency Fields at Frequencies from 3 kHz</u> to 300 GHz, Issue 3, March 2015.
- 11. Industry Canada RSS-102 <u>Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)</u>, Issue 5, March 2015.
- 12. EC Council Recommendation 1999/519/EC "On the limitation of exposure of the general public to electromagnetic fields (0Hz to 300GHz)," (1999).
- 13. European Committee for Electrotechnical Standardization. European Normative, EN 62311 <u>Assessment of electronic and electrical equipment related to human exposure restrictions for electromagnetic fields (0 Hz to 300 GHz)</u>, 2008.
- 14. European Committee for Electrotechnical Standardization. European Normative, EN 62479 <u>Assessment of the</u> <u>compliance of low power electronic and electrical equipment with the basic restrictions related to human</u> <u>exposure to electromagnetic fields (10 MHz to 300 GHz)</u>, 2010.
- 15. International Commission on Non-Ionizing Radiation Protection. Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic, and Electromagnetic Fields (up to 300 GHz). Health Physics 74 (4): 494-522; 1998.
- 16. International Commission on Non-Ionizing Radiation Protection Statement on the "Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 GHz). Health Physics 97(3):257-259, 2009.