



Radio Frequency Exposure Evaluation Report

For:

Xirgo Technologies Inc.

Model Number:

XT4970D

Product Description:

Vehicle Solar harvesting GPS/Cellular Tracker with BT/ZGB Tech

FCC ID: GKM-XT4970D

IC ID: 10281A-XT4970D

Per:

CFR Part Part 1 (1.1307 &1.1310), Part 2 (2.1091),
FCC KDB 447498 D01 General RF Exposure Guidance v06

Report number: EMC_XIRGO-111-15001_FCC_MPE_v1.2

DATE: February 19, 2016



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1 Assessment


This RF Exposure evaluation report provides information about compliance of the below identified device with the RF Exposure limits for mobile devices as defined in FCC CFR Part 1 (1.1307 & 1.1310), Part 2 (2.1091) and IC standard RSS-102 issue 5 under given conditions (measured or rated RF output power, antenna gain, distance towards human body, multiple transmitter information as presented by the applicant). In addition, maximum antenna gain or minimum distance towards the human body is calculated, respectively, where relevant.

The device meets the limits as stipulated by the above given FCC and IC rule parts based on available specifications.

| Company | Description | Model # |
|-------------------------|--|---------|
| Xirgo Technologies Inc. | Vehicle Solar harvesting GPS/Cellular Tracker with BT/ZGB Tech | XT4970D |

Responsible for the Test Laboratory:


February 19, 2016 Compliance Heiko Strehlow
 (VP RC&EMC)

 Digitally signed by Heiko Strehlow
 Date: 2016.02.21 22:44:50 -08'00'

| Date | Section | Name | Signature |
|------|---------|------|-----------|
|------|---------|------|-----------|

Responsible for the Report:

February 19, 2016 Compliance Franz Engert
 (Manager Compliance Services)

 Digitally signed by Franz Engert
 DN: cn=Franz Engert, c=US, o=CETECOM, ou=Compliance, email=franz.engert@cetecom.com

| Date | Section | Name | Signature |
|------|---------|------|-----------|
|------|---------|------|-----------|

2 Administrative Data

1.1 Identification of the Testing Laboratory Issuing the Test Report

| | |
|----------------------------|---|
| Company Name: | CETECOM Inc. |
| Department: | Compliance |
| Address: | 6370 Nancy Ridge Drive San Diego, CA 92121 U.S.A. |
| Telephone: | +1 (858) 362 2400 |
| Fax: | +1 (858) 687-4809 |
| Compliance Manager: | Franz Engert |
| Project Engineer: | Tony Planinac |

2.1 Identification of the Client / Manufacturer

| | |
|-------------------------|-------------------------|
| Clients Name: | Xirgo Technologies Inc. |
| Clients Address: | 188 Camino Ruiz |
| City/Zip Code | Camarillo, CA 93012 |
| Country | USA |
| Contact Person: | Johnny Chen |
| Phone No. | 805-338-2204 |
| Fax: | |
| e-mail: | Jchen@xirgotech.com |

3 Equipment under Assessment

| | |
|---|---|
| Model #: | XT4970D |
| Product Description: | Vehicle Solar harvesting GPS/Cellular Tracker with BT/ZGB Tech |
| FCC-ID: | GKM-XT4970D |
| IC certification number, HVIN, PMN, FVIN: | 10281A-XT4970D, XT4970D, CXT4970D, NA |
| Technology/ Type(s) of Modulation: | UMTS/HSPA; LTE SC-FDMA: (Module ublox TOBY-L201, FCC ID: XPYTOBYL201, IC: 8595A-TOBYL201) Bluetooth 4.0 with BT-LE and BT-BDR/EDR (TI CC2564) ZigBee (TI CC2530 with CC2591 LNA/PA) |
| Operating Frequency Ranges (MHz)/ Channels: | UMTS FDD II / LTE Band 2 (1800MHz): 1850 MHz – 1910 MHz LTE Band 4 (1700 MHz): 1710 -1755 MHz UMTS FDD V / LTE Band 5 (800MHz): 824 MHz – 849 MHz LTE Band 13 (700 MHz): 777 MHz – 787 MHz LTE Band 17 (700 MHz): 704 MHz – 716 MHz BT and ZigBee: ISM band 2.4GHz – 2.4835GHz |
| Antenna info: | cellular radio: SMD dielectric antenna peak gain: 3.05dBi @ Band 4 -0.21dBi @ Band 13,17 0.77dBi @ Band 5 2.92dBi @ Band 2 BT and ZigBee: SMD ceramic antenna 1.5dBi @ 2.45GHz |
| Co-located Transmitters/ Antennas? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Device Category: | <input checked="" type="checkbox"/> Fixed Installation <input type="checkbox"/> Mobile <input type="checkbox"/> Portable <input type="checkbox"/> Mixed Mobile and Portable |
| Exposure Category: | <input type="checkbox"/> Occupational/ Controlled <input checked="" type="checkbox"/> General Population/ Uncontrolled |
| Power Supply/ Rated Operating Voltage Range: | Vmin: 8.0V dc/ Vnom: 12.0V dc / Vmax: 24.0V dc |
| operating temperature range | -40 °C to 70 °C |
| Test Sample Status: | Pre-production |

4 RF Exposure Limits - EMC (ERP/EIRP) Limits - FCC and IC Basic Rules

For the specific described radio apparatus the following basic limits and rules apply:

4.1 Power Density Limits acc. to FCC 1.1310(e) / IC RSS-102 i5, cl. 4:

FCC

| Frequency Range (MHz) | Power density (mW/cm ²) | Averaging time (minutes) |
|-----------------------|-------------------------------------|--------------------------|
| 300 – 1500 | $f \text{ (MHz)} / 1500$ | 30 |
| 1500 – 100.000 | 1.0 | 30 |

IC

| Frequency Range (MHz) | Power density (W/m ²) | Averaging time (minutes) |
|-----------------------|---|--------------------------|
| 300 – 6000 | $0.02619 \times f \text{ (MHz)}^{0.6834}$ | 6 |

4.2 FCC Categorical Exclusion and IC Routine Environmental Evaluation Exemption Thresholds

FCC § 2.1091(c)

operating frequency < 1.5GHz: excluded if ERP < 1.5W / 31.8dBm (EIRP: 33.9);

operating frequency > 1.5GHz: excluded if ERP < 3.0W / 34.8dBm (EIRP: 36.9);

IC RSS-102, cl. 2.5

300MHz < = operating frequency < 6 GHz: exempted if EIRP < $0.0131 \times f \text{ (MHz)}^{0.6834} \text{ W}$

When a device (mobile or fixed application) qualifies for the FCC categorical exclusion provision of § 2.1091(c) estimation of RF exposure compliance for example per plane wave power density formula (see below) is permitted. Otherwise, further MPE evaluation (measurement or simulation) would be required for TCB approval.

Industry Canada RSS-102 does generally not require further RF exposure evaluation for fixed or mobile applications which stay below the above given exemption limits.

Note that the thresholds for FCC categorical exclusion and IC routine evaluation exemption are no compliance limits but determine the ERP/EIRP limit above which further MPE evaluation (e.g. E or H field measurement) or simulation would be required to show compliance.

4.3 EMC Output Power Limits (ERP/EIRP)

In any case, the EMC ERP/EIRP limits of the relevant FCC / IC rule parts must be respected.

FCC part 22/24 / IC RSS-132, RSS-133 (to be additionally taken into account for maximum antenna gain considerations)

FCC part 22: 7W ERP / 38.5dBm / IC RSS-132: 11.5W EIRP / 40.6dBm

FCC part 24: 2W EIRP / 33.0dBm / IC RSS 133: same as FCC part 24

FCC Part 27.50 (d) (4) (6) / RSS-139 Section 6.5

4.4 RF Exposure Estimation (MPE Estimation)

Having available the source based average output power and peak antenna gain or the ERP/EIRP of the specified device and for a known minimum distance of its radiating structures from the body of persons according to its use cases (at least 20cm) the power density at that distance can be estimated by the following formula for plane-wave equivalent conditions (far-field conditions), when ground reflection is neglected.

$$S = \frac{PG}{4\pi R^2}$$

where: S = power density (mW/cm² or W/m²)
P = power input to the antenna (mW or W)
G = power gain of the antenna in the direction of interest relative to an isotropic radiator
R = distance to the center of radiation of the antenna (cm or m)

5 Evaluations

5.1 Routine Environmental Evaluation Applicability - Categorical Exclusion per FCC § 2.1091(c)

EIRP for cellular is based on measured results under 6. in this report as these results were higher than maximum conducted power + tune up tolerance + declared antenna gain would suggest.

EIRP for BT and Zig Bee is based on maximum declared conducted output power + declared gain as this was slightly higher than the verification measurement.

| Transmission Mode | Duty Cycle (%) | Maximum EIRP [dBm] | FCC / IC Limits for Routine Environmental Evaluation Applicability, EIRP (dBm) | Exempt from Routine evaluation (Yes/No) |
|-------------------|----------------|--------------------|--|---|
| LTE 2 | 100 | 27.7 | 36.9 / 33.5 | Yes |
| UMTS FDD II | 100 | 29.1 | 36.9 / 33.5 | Yes |
| LTE4 | 100 | 29.4 | 36.9 / 33.3 | Yes |
| LTE 5 | 100 | 26.3 | 33.9 / 31.1 | Yes |
| UMTS FDD V | 100 | 30.7 | 33.9 / 31.1 | Yes |
| LTE 13 | 100 | 28.4 | 33.9 / 30.9 | Yes |
| LTE 17 | 100 | 26.6 | 33.9 / 30.7 | Yes |
| BT | 100 | 13.5 | 36.9 / 34.3 | Yes |
| ZigBee | 100 | 13.5 | 36.9 / 34.3 | Yes |

(1) max. cellular oputput powers as measured under 6.

(2) the cellular and either BT or ZigBee may transmit simultaneously, but not BT and ZigBee, acc. to documentation;

(3) powers for ZigBee and BT were measured with peak detector so no duty cycle correction required.

Conclusion:

- For operation of a single transmitter the equipment qualifies for the categorical exclusion provision of FCC § 2.1091(c) and is exempted from further RF exposure routine evaluation acc. to IC RSS-102 section 2.5.2.

5.2 Compliance with FCC and IC Plane Wave Power Density Limits - single transmitters

| Power Density Calculation for a distance between the transmitter and the human body of 20cm | | | | |
|---|----------------|-------------------------------------|------------------------------------|---------|
| Band of Operation (MHz) | max EIRP (dBm) | Power Density (mW/cm ²) | FCC/IC Limit (mW/cm ²) | Verdict |
| LTE 2 | 27.7 | 0.1171 | 1.00 / 0.45 | Pass |
| UMTS FDD II | 29.1 | 0.1617 | 1.00 / 0.45 | Pass |
| LTE4 | 29.4 | 0.1733 | 1.00 / 0.43 | Pass |
| LTE 5 | 26.3 | 0.0849 | 0.55 / 0.26 | Pass |
| UMTS FDD V | 30.7 | 0.2337 | 0.55 / 0.26 | Pass |
| LTE 13 | 28.4 | 0.1376 | 0.52 / 0.25 | Pass |
| LTE 17 | 26.6 | 0.0909 | 0.47 / 0.23 | Pass |
| BT | 13.5 | 0.0045 | 1.00 / 0.54 | Pass |
| ZigBee | 13.5 | 0.0045 | 1.00 / 0.54 | Pass |

note: comparison with IC limits is provided for information only but not required according to the result of section 5.1

Conclusion:

- The equipment respects the FCC and IC Plane Wave Power Density Limits for the minimum distance between the antenna and the human body of 20cm, and above.

5.3 Maximum allowed Antenna Gain – Gmax

- not applicable since fixed internal antenna is used in the product;

5.4 Simultaneous Transmission Evaluation

Simultaneous transmission does not occur between BT and ZigBee, only between one of the unlicensed radios and one of the licensed radios.

| Power Density Calculation for a distance between the transmitter and the human body of 20cm | | | | | | |
|---|-------------------------------------|---|------------------------------|------------------------------------|--------------------|---------|
| Band of Operation (MHz) | Power Density (mW/cm ²) | IC Limit worst case (mW/cm ²) | Single transmitter MPE ratio | simultaneous transmitter MPE ratio | FCC/IC Limit ratio | Verdict |
| LTE 2 | 0.1171 | 0.45 | 0.26 | 0.27 | 1.00 | Pass |
| UMTS FDD II | 0.1617 | 0.45 | 0.36 | 0.37 | 1.00 | Pass |
| LTE4 | 0.1733 | 0.43 | 0.40 | 0.41 | 1.00 | Pass |
| LTE 5 | 0.0849 | 0.26 | 0.33 | 0.34 | 1.00 | Pass |
| UMTS FDD V | 0.2337 | 0.26 | 0.90 | 0.91 | 1.00 | Pass |
| LTE 13 | 0.1376 | 0.25 | 0.55 | 0.56 | 1.00 | Pass |
| LTE 17 | 0.0909 | 0.23 | 0.40 | 0.41 | 1.00 | Pass |
| BT | 0.0045 | 0.54 | 0.01 | 0.25 | 1.00 | Pass |
| ZigBee | 0.0045 | 0.54 | 0.01 | 0.25 | 1.00 | Pass |

Conclusion:

- The equipment qualifies for the exclusion from further simultaneous transmission MPE evaluation (measurement or simulation as appropriate and agreed on with FCC/IC)

6 Effective Isotropic Radiated Power measurements for the licensed radios

FCC 2.1046: RF power output

Power output shall be measured at the RF output terminals when the transmitter is adjusted in accordance with the tune-up procedure to give the values of current and voltage on circuit elements as specified. The electrical characteristics of the radio frequency load attached to the output terminals when this test is made shall be stated.

RSS-Gen 6.12: RF power output.

Transmitter output power measurements shall be carried out before the unwanted emissions test. The transmitter output power value, obtained from this test, serves as the reference level used to determine the unwanted emissions.

6.1 References

FCC: CFR Part 2.1046, CFR Part 22.913, CFR Part 24.232, CFR Part 27.50

IC: RSS-Gen Section 6.12; RSS-132 Section 5.4; RSS-133 Section 6.4, RSS-139 Section 6.5

6.2 Limits:

ERP/EIRP (850 MHz Band)

FCC Part 22.913 (a) & RSS-132 Section 5.4

FCC: Peak ERP < 38.45 dBm (7W)

The effective radiated power (ERP) of mobile transmitters must not exceed 7 Watts.

IC: Average EIRP < 40.60 dBm (11.5W)

The transmitter output power shall be measured in terms of average power. The equivalent isotropically radiated power (e.i.r.p.) for mobile equipment shall not exceed 11.5 watts.

EIRP (1900 MHz Band)

FCC Part 24.232 (c) (e) & RSS-133 Section 6.4

FCC: Peak EIRP < 33 dBm (2W)

(b) Mobile/portable stations are limited to 2 Watts effective isotropic radiated power (EIRP).

(c) Peak transmit power must be measured over any interval of continuous transmission using instrumentation calibrated in terms of an rms equivalent voltage. The measurement results shall be properly adjusted for any limitations, such as detector response times, limited resolution bandwidth capability when compared to the emission bandwidth, sensitivity, etc., so as to obtain a true peak measurement over the full bandwidth of the channel.

IC: Average EIRP < 33 dBm (2W)

The transmitter output power shall be measured in terms of average power. The equivalent isotropically radiated power (e.i.r.p.) for mobile equipment shall not exceed 2 watts.

EIRP (1700 MHz Band)

FCC Part 27.50 (d) (4) (6) & RSS-139 Section 6.5

FCC: Peak EIRP < 30 dBm (1W)

Fixed, mobile and portable (handheld stations) operating in the 1710-1755 MHz band are limited to 1 watt EIRP

Peak transmit power must be measured over any interval of continuous transmission using instrumentation calibrated in terms of an rms-equivalent voltage. The measurement results shall be properly adjusted for any instrument limitations, such as detector response times, limited resolution bandwidth capability when compared to the emission bandwidth, sensitivity, *etc.*, so as to obtain a true peak measurement for the emission in question over the full bandwidth of the channel

IC: Average EIRP < 30 dBm (1W)

The average equivalent isotropically radiated power (e.i.r.p.) for fixed, mobile and portable transmitters in the 1710-1755 MHz shall not exceed 1 watt.

6.3 Measurement Procedure:

The EIRP measurements were performed in a fully anechoic chamber at a measurement distance to the EUT of 1.65m. The chamber is calibrated by substitution method according to TIA-603C 2004.

For LTE 1 uplink resource block has been used with a nominal bandwidth of 10MHz as this depicts the highest power for LTE.

For UMTS powers have been tested in Rel. 99 mode as this depicts the highest powers for UMTS.

An RMS detector was used for the measurements in all cases.

6.4 Test Conditions:

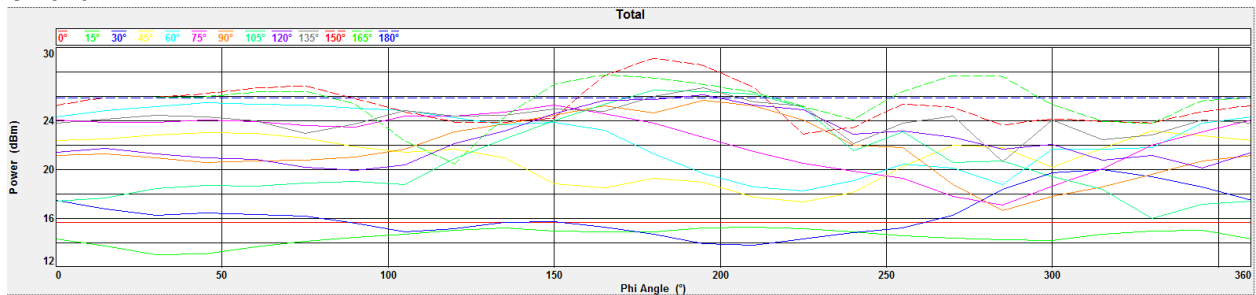
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6.5 Test Results

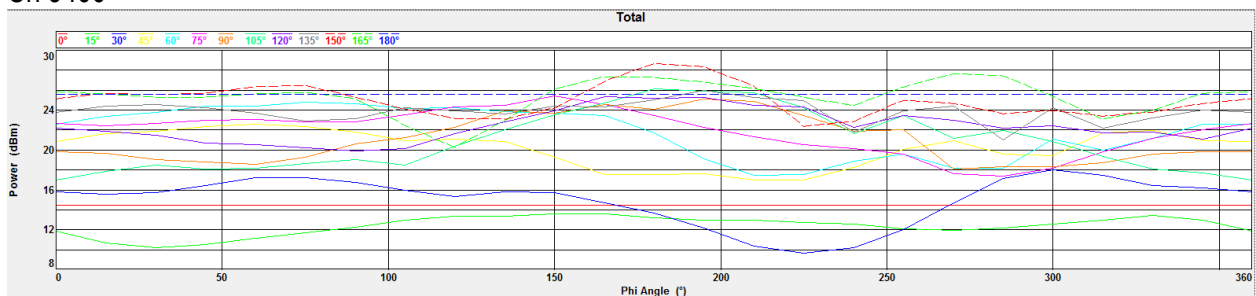
UMTS II WCDMA Dual channel QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|-------------------------|--------------------------|
| 9262 | 1852.4 | 22.8 | 29.1 |
| 9400 | 1880.0 | 22.4 | 28.7 |
| 9538 | 1907.6 | 22.8 | 28.8 |

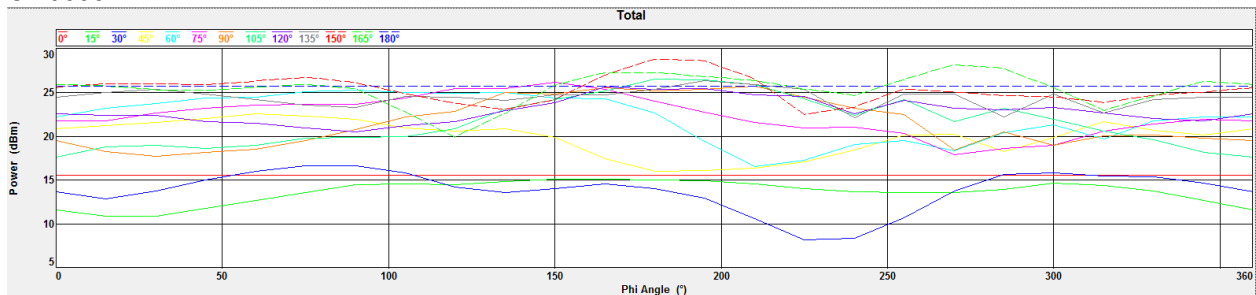
Ch 9262



Ch 9400



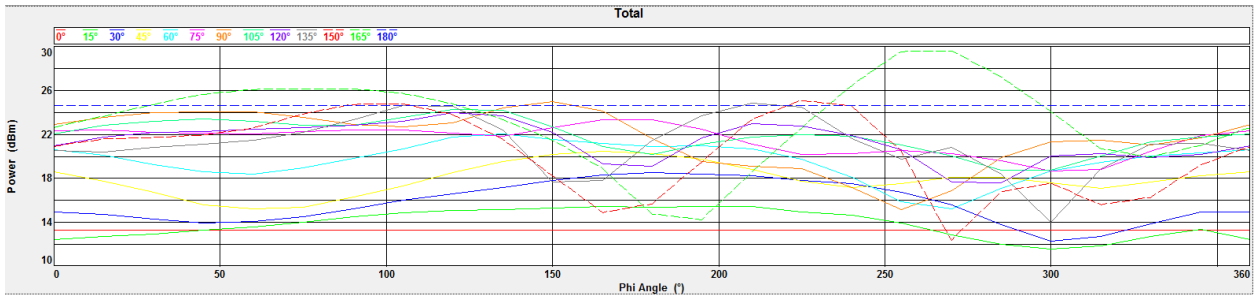
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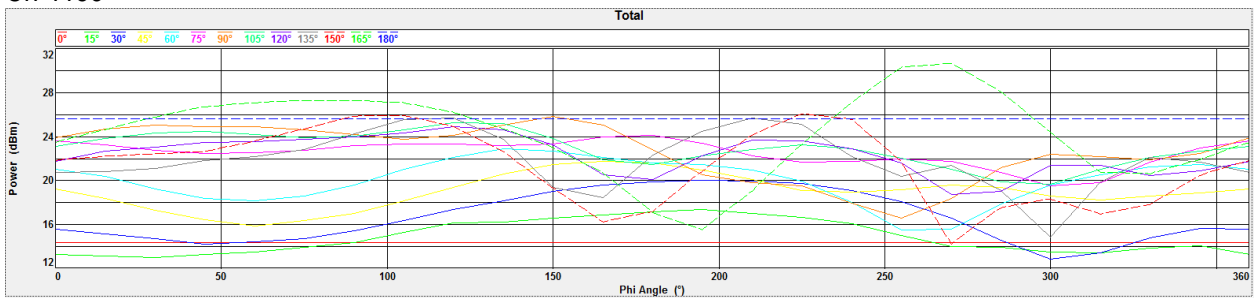
UMTS V WCDMA Dual channel QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|----------------------|-----------------------|
| 4132 | 826.4 | 21.2 | 29.5 |
| 4183 | 836.6 | 22.1 | 30.7 |
| 4233 | 846.6 | 20.9 | 29.7 |

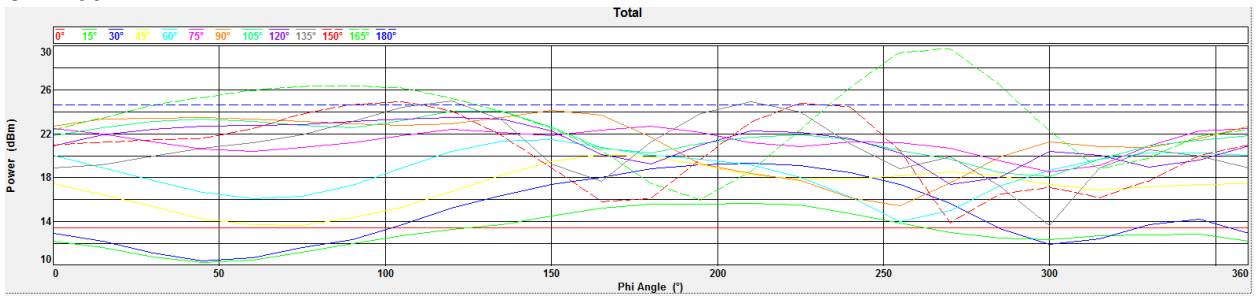
Ch 4132



Ch 4183



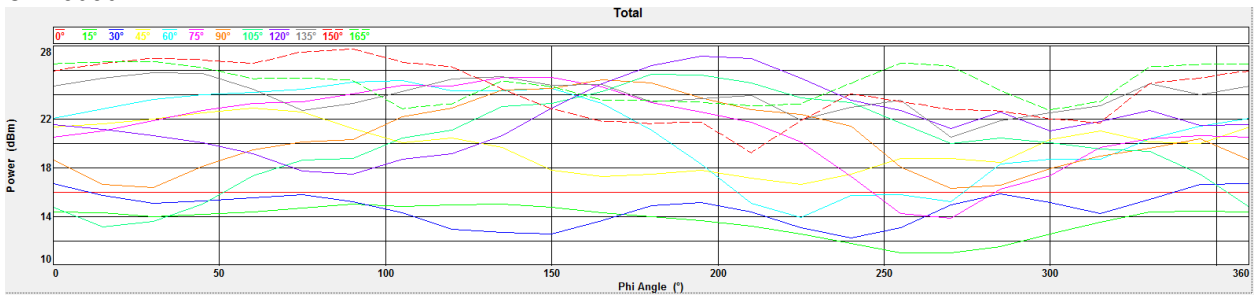
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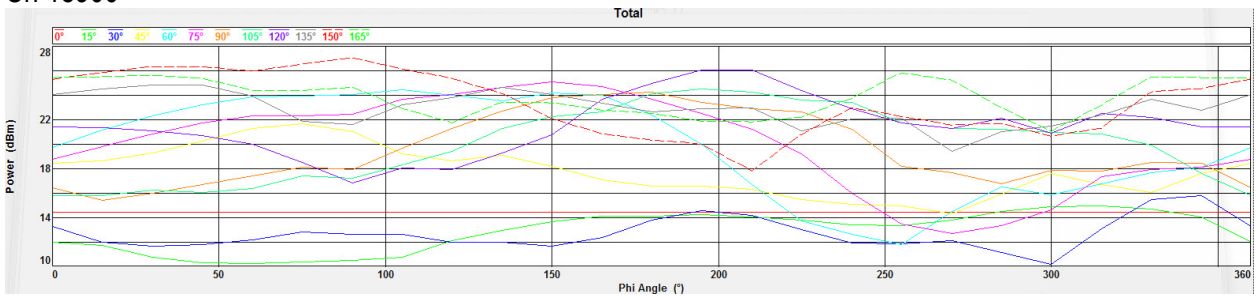
LTE 2 SC-FDMA with QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|----------------------|-----------------------|
| 18650 | 1851.6 | 22.00 | 27.7 |
| 18900 | 1880.0 | 21.14 | 27.0 |
| 19150 | 1908.4 | 21.94 | 27.6 |

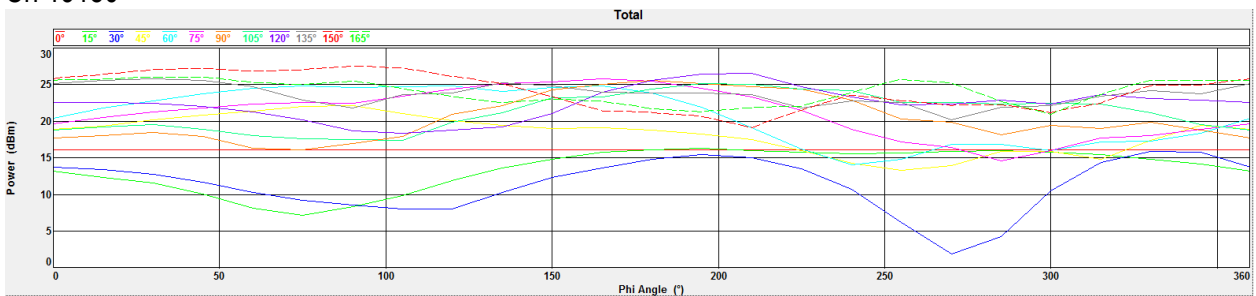
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Ch 18900



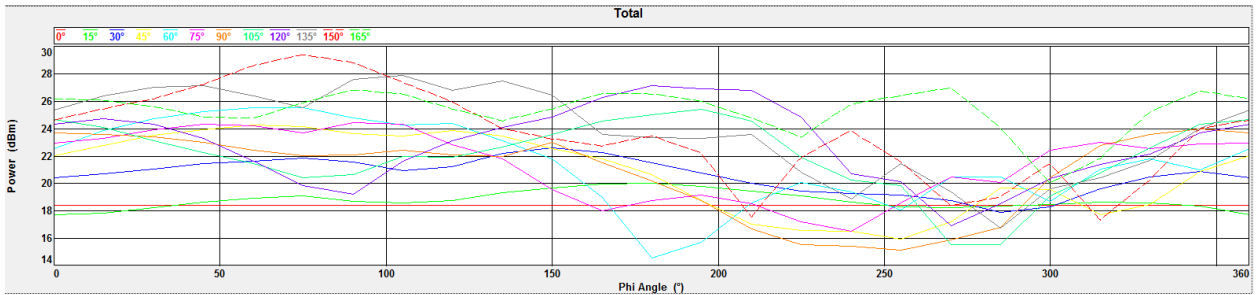
Ch 19150



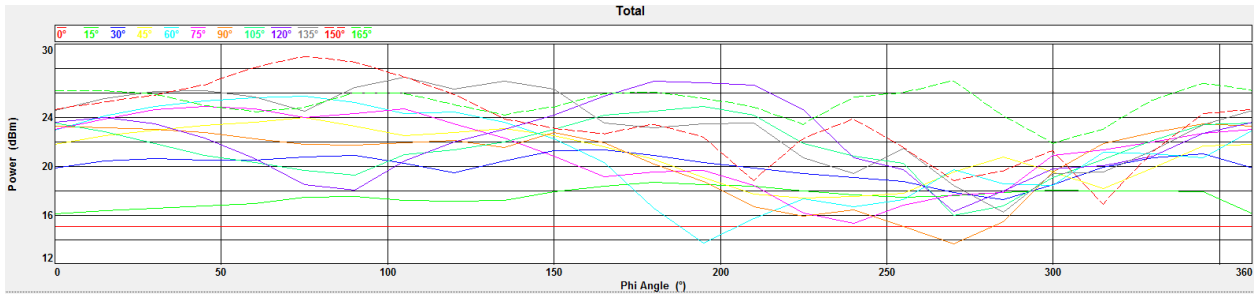
LTE 4 SC-FDMA with QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|-------------------------|--------------------------|
| 20000 | 1715.0 | 22.65 | 29.4 |
| 20175 | 1732.5 | 22.31 | 29.0 |
| 20350 | 1750.0 | 22.87 | 29.1 |

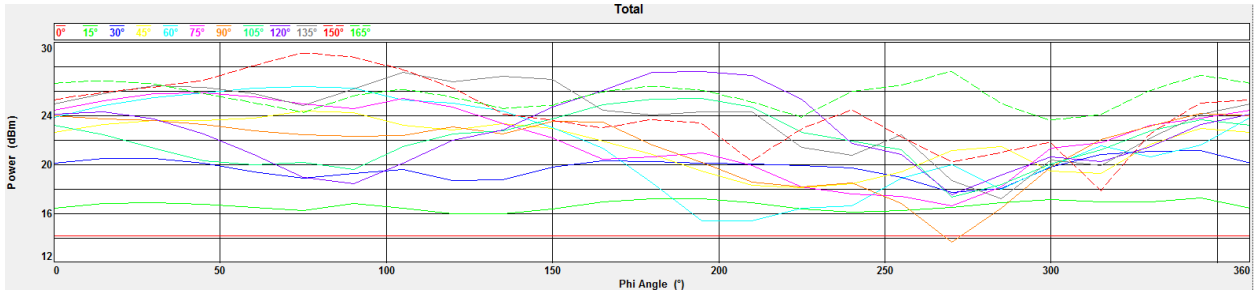
Ch 20000



Ch 20175



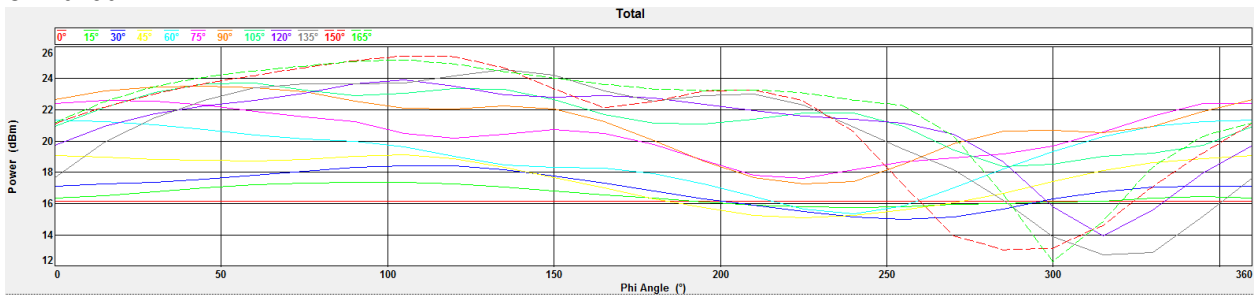
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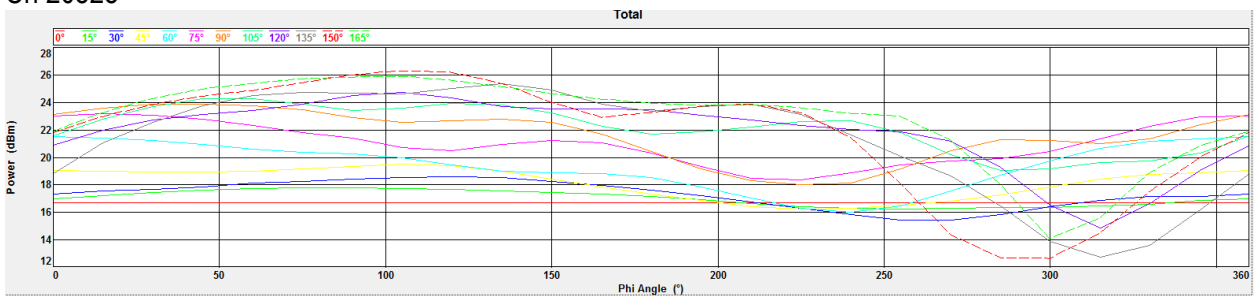
LTE 5 SC-FDMA with QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|----------------------|-----------------------|
| 20450 | 825.58 | 20.68 | 25.4 |
| 20525 | 836.50 | 21.31 | 26.3 |
| 20600 | 847.42 | 20.15 | 25.3 |

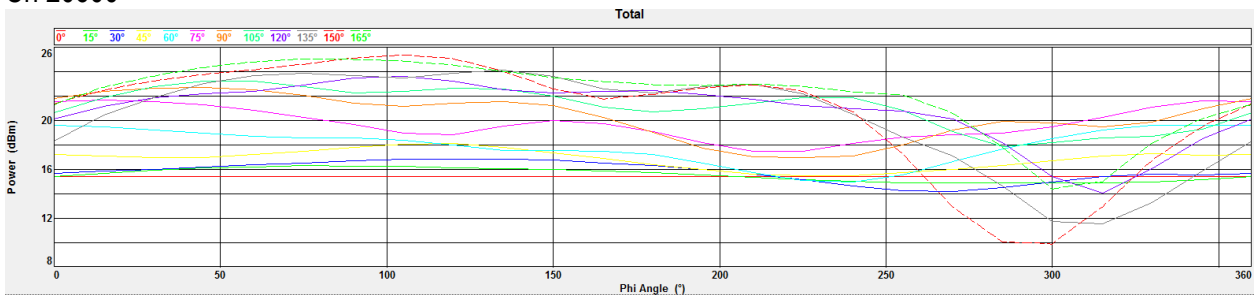
Ch 20450



Ch 20525



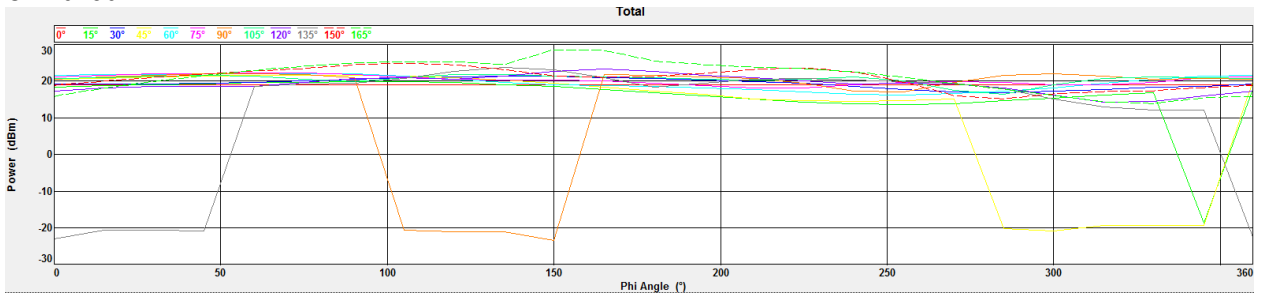
Ch 20600



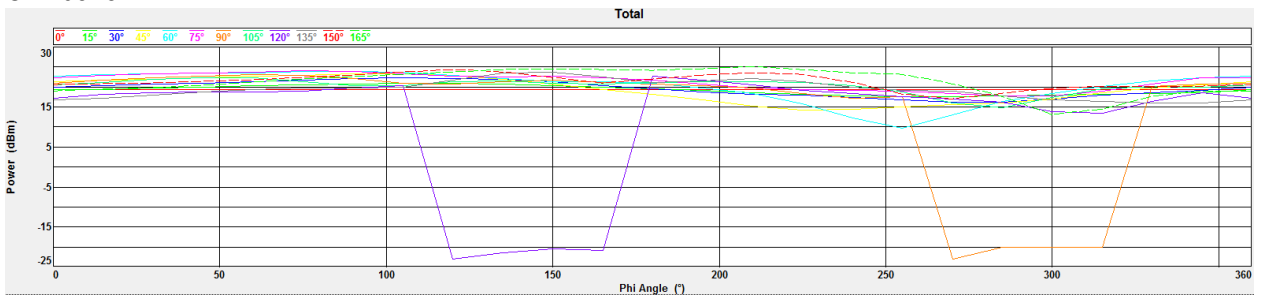
LTE 13 SC-FDMA with QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|-------------------------|--------------------------|
| 23230 | 778.58 | 20.01 | 28.4 |
| 23230 | 782.00 | 20.48 | 25.1 |
| 23230 | 785.42 | 19.87 | 25.6 |

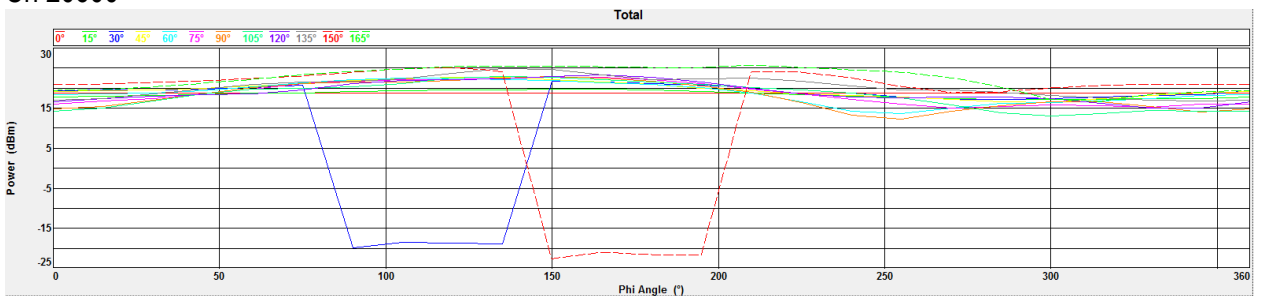
Ch 20450



Ch 20525



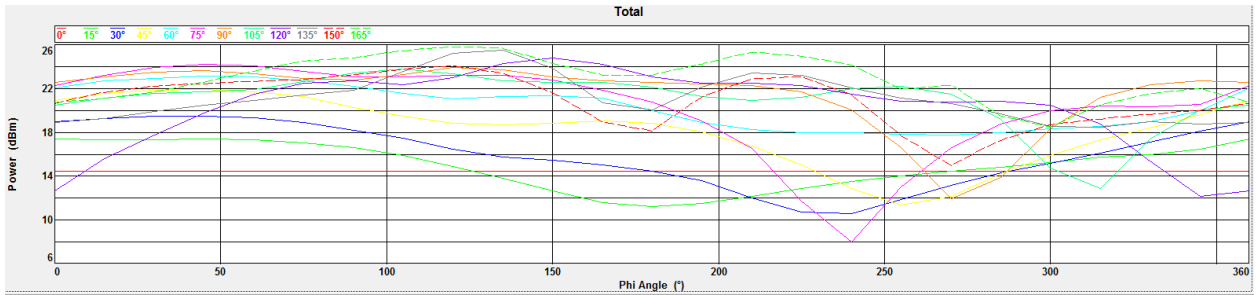
Ch 20600



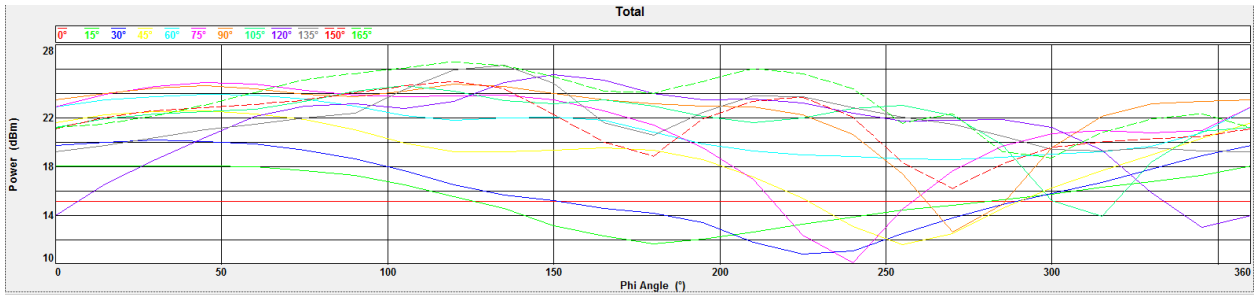
LTE 17 SC-FDMA with QPSK

| Channel | Frequency (MHz) | TRP (dBm) Free Space | EIRP (dBm) Free Space |
|---------|-----------------|-------------------------|--------------------------|
| 23780 | 705.58 | 20.95 | 25.8 |
| 23790 | 710.00 | 21.69 | 26.6 |
| 23800 | 714.42 | 20.90 | 25.7 |

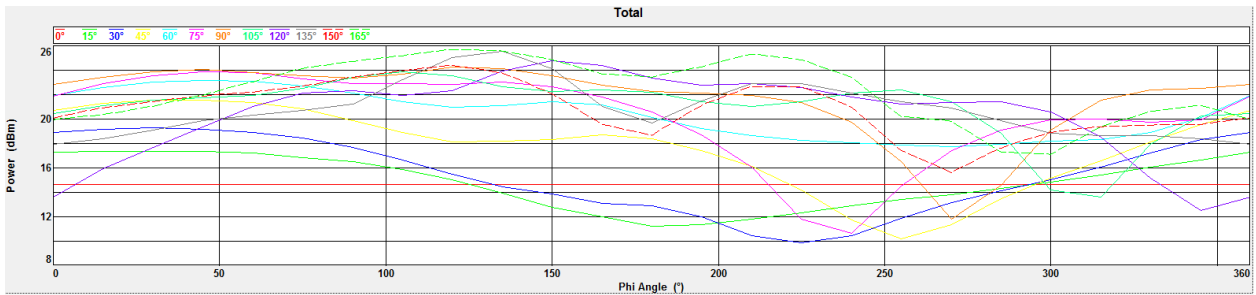
Ch 23780



Ch 23790



Ch 23800



6.6 Anechoic Chamber OTA2 used for EIRP measurements

| TYPE OF EQUIPMENT | MODEL NUMBER | MANUFACTURER | SN | CALIBRATION DUE DATE |
|--|-----------------|---------------------|--------------|----------------------|
| Rectangular Anechoic Chamber | DR S 201 4x7 RH | ETS-Lindgren | N/A | Aug 2016 |
| Quad-Ridge Horn Antenna 400MHz-6GHz | EMCO3164 | ETS-Lindgren | 00069447 | N/R |
| Circularly Polarized Communication Antenna | EMCO3102 | ETS-Lindgren | 00078664 | N/A |
| Circularly Polarized Communication Antenna | EMCO3102 | ETS-Lindgren | 00069033 | N/A |
| Antenna Position Controller | EMCO2090 | ETS-Lindgren | 00078764 | N/A |
| Dual Axis Positioner | None | The Howland Company | N/A | N/A |
| Low loss RF Cables | N/A | Huber & Suhner | N/A | N/R |
| Desktop Test Computer | Optiplex745 | Dell Computer | N/A | N/A |
| Pattern Measurement Software | EMQuest | ETS-Lindgren | 1013 | N/A |
| Base Station Emulator | CMU-200 | Rohde & Schwarz | 110230 | July 2017 |
| Power Meter | NRVD | Rohde & Schwarz | 849708 / 005 | July 2017 |
| Power Meter | NRVD | Rohde & Schwarz | 849708 / 005 | July 2017 |
| Spectrum Analyzer | FSP | Rohde & Schwarz | 100837 | July 2017 |

7 Revision History

| Date | Report Name | Changes to report | Report prepared by |
|-------------------|----------------------------------|--|--------------------|
| February 09, 2016 | EMC_XIRGO-111-15001_FCC_MPE | First Version | Franz Engert |
| February 17, 2016 | EMC_XIRGO-111-15001_FCC_MPE_v1.1 | Use measured EIRPs because they are much higher than conducted power + gain. Clarify wording on categorical exclusion. | Franz Engert |
| February 19, 2016 | EMC_XIRGO-111-15001_FCC_MPE_v1.2 | Added EIRP measurement results | Franz Engert |