



Radio Frequency Exposure Evaluation Report

FOR:

Telular Corporation

Model:

GXT5002C

Product Description:

The GXT5002C is a solar powered GPS asset management solution that provides enhanced asset utilization and cargo visibility

Applied Rules and Standards:

CFR 47 Part 2 (2.1091),
FCC KDB 447498 D01 General RF Exposure Guidance v06
ISED RSS-102 Issue 5

FCC ID: MTFGXT5002C

IC ID: 2175D-GXT5002C

Report number: EMC_TELUL-076-19001_FCC_ISED_MPE

DATE: 2019-11-27



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3462B-2**

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1. Assessment

This RF Exposure evaluation report provides evidence for 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 worst case 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 for worst case conditions at 20cm distance to the body.

| Company | Description | Model # |
|---------|---|----------|
| Telular | The GXT5002C is a solar powered GPS asset management solution that provides enhanced asset utilization and cargo visibility | GXT5002C |

Responsible for Testing Laboratory:

| 2019-11-27 | Compliance | Cindy Li (Lab Manager EMC) | |
|------------|------------|-------------------------------|-----------|
| Date | Section | Name | Signature |

Responsible for the Report:

| 2019-11-27 | Compliance | Chin Ming Lui (Associate EMC Engineer) | |
|------------|------------|---|-----------|
| Date | Section | Name | Signature |

The test results of this test report relate exclusively to the test item specified in Section 3.

CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

2. Administrative Data

2.1. Identification of the Testing Laboratory Issuing the Test Report

| | |
|------------------------------------|------------------------|
| Company Name: | CETECOM Inc. |
| Department: | Compliance |
| Street Address: | 411 Dixon Landing Road |
| City/Zip Code | Milpitas, CA 95035 |
| Country | USA |
| Telephone: | +1 (408) 586 6200 |
| Fax: | +1 (408) 586 6299 |
| Lab Manager EMC: | Cindy Li |
| Responsible Project Leader: | Cathy Palacios |

2.2. Identification of the Client

| | |
|--------------------------|---------------------------------|
| Applicant's Name: | Telular Corporation. |
| Street Address: | 3225 Cumberland Blvd. Suite 300 |
| City/Zip Code | Atlanta, GA 30339 |
| Country | USA |

2.3. Identification of the Manufacturer

| | |
|--------------------------|----------------|
| Applicant's Name: | Same as Client |
| Street Address: | |
| City/Zip Code | |
| Country | |

3. Equipment under Assessment

3.1. EUT Specifications

| | |
|---|--|
| Firmware Version Identification Number (FVIN): | CM.00.01.1025 |
| Hardware Version Identification Number (HVIN): | REV C |
| Product Marketing Name (PMN): | Falcon GXT5002C |
| Antenna (Primary & Diversity) Information as declared: | Ethertronics P822601, Peak Gain: 3.9 dBi |
| Other Radios included in the device: | <ul style="list-style-type: none"> ❖ <u>ISM</u> <ul style="list-style-type: none"> • Module: SiLab EFR32 • Model Number: EFR32FG1P131F256GM32 • Modulation: 2GFSK • Main Antenna: <ul style="list-style-type: none"> ▪ Type: Small Helix ▪ Location: Internal ▪ Gain: 0.8 dBi ▪ Operating Frequency: 902 – 928 MHz ❖ <u>GPS</u> <ul style="list-style-type: none"> • Module: Quectel L80 • Antenna location: Internal |
| Power Supply/ Rated Operating Voltage Range: | Battery / Low 6.2 VDC, Nominal 12 VDC, High 17 VDC |
| Operating Temperature Range: | Low -30° C, High 70° C |
| Sample Revision | <input type="checkbox"/> Prototype Unit; <input checked="" type="checkbox"/> Production Unit; <input type="checkbox"/> Pre-Production |
| EUT Dimensions(inches): | 1.5" (H) x 3.75" (W) x 21.5" (L) |
| Weight(lbs): | 3 lbs |
| EUT Diameter | <input checked="" type="checkbox"/> < 60 cm <input type="checkbox"/> Other _____ |

| Module Information | |
|-------------------------------------|--|
| Module Name: | Sierra Wireless |
| Model Number: | HL7688 |
| FCC/IC ID: | FCC ID: N7NHL7688 IC ID: 2417C-HL7688 |
| Frequency Band of Operation: | <ul style="list-style-type: none">• FDD UMTS II: 1852.4 – 1907.6 MHz• FDD UMTS V: 826.4 – 846.6 MHz• LTE Band 2: 1850 – 1910 MHz• LTE Band 4: 1710 – 1755 MHz• LTE Band 5: 824 – 849 MHz• LTE Band 17: 704 – 716 MHz |
| Main Antenna: | Type: Ethertronics P822601 Location: Internal Peak Gain: <ul style="list-style-type: none">• FDD UMTS Band II: 3.8 dBi• FDD UMTS Band V: 1.8 dBi• LTE Band 2: 3.8 dBi• LTE Band 4: 3.9 dBi• LTE Band 5: 1.8 dBi• LTE Band 17: 1.1 dBi |

4. RF Exposure Limits and FCC and IC Basic Rules

For the specific described radio apparatus the following basic limits and rules apply for both, FCC and IC where not indicated differently.

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

FCC

| Frequency Range (MHz) | Power density (mW/cm ²) | Averaging time (minutes) |
|-----------------------|-------------------------------------|--------------------------|
| 300 – 1500 | f (MHz) /1500 | 30 |
| 1500 – 100000 | 1.0 | 30 |

IC

| | | |
|------------|---|---|
| 300 – 6000 | $0.02619 \times f \text{ (MHz)}^{0.6834}$ | 6 |
|------------|---|---|

4.2 Routine Environmental Evaluation Categorical Exclusion Limits acc. to FCC 2.109(c) / RSS-102, cl. 2.5 (rounded to 1 decimal point):

FCC

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

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

4.3 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 Analysis to Exclude Routine RF Exposure evaluation for Stand Alone Operation

| Band | Lowest Frequency [MHz] | FCC EIRP Limit | IC EIRP Limit in W | IC EIRP Limit in dBm | EIRP in dBm | Verdict |
|---------|------------------------|----------------|--------------------|----------------------|-------------|---------|
| UMTS II | 1850.00 | 36.900 | 2.24 | 33.50 | 28.8 | Exempt |
| UMTS V | 826.40 | 33.900 | 1.29 | 31.11 | 26.8 | Exempt |
| | | | | | | |
| LTE 2 | 1850.00 | 36.900 | 2.24 | 33.50 | 28.8 | Exempt |
| LTE 4 | 1710.00 | 36.900 | 2.12 | 33.26 | 28.9 | Exempt |
| LTE 5 | 824.00 | 33.900 | 1.29 | 31.11 | 26.8 | Exempt |
| LTE 17 | 704.00 | 33.900 | 1.16 | 30.64 | 26.1 | Exempt |
| | | | | | | |
| ISM | 902 | 33.900 | 1.37 | 31.37 | 21.16 | Exempt |

The single radios are exempt from routine environmental evaluation.

5.2 Analysis of RF Exposure for simultaneous transmission

Standalone MPE analysis:

- Evaluations are based on worst case power density limits for Canada.
- Calculations are made for 20cm.
- Evaluations are based on EIRP measured or calculated from known gain and conducted output power.
- Cellular and ISM can transmit simultaneously

| Radio | Freq MHz | EIRP in W | Canada W/m2 | Actual W/m2 | How much of limit is used up |
|---------|----------|-----------|-------------|-------------|------------------------------|
| UMTS II | 1852.4 | 0.76 | 4.480 | 1.509 | 33.68% |
| UMTS V | 826.4 | 0.48 | 2.581 | 0.952 | 36.89% |
| | | | | | |
| LTE 2 | 1857.5 | 0.76 | 4.489 | 1.509 | 33.62% |
| LTE 4 | 1717.5 | 0.78 | 4.255 | 1.544 | 36.29% |
| LTE 5 | 829 | 0.48 | 2.586 | 0.952 | 36.81% |
| LTE 17 | 704 | 0.41 | 2.313 | 0.810 | 35.04% |
| | | | | | |
| ISM | 902 | 0.13 | 2.740 | 0.260 | 9.48% |

Conclusion:

The worst case simultaneous transmission is UMTS V simultaneous with ISM which is using $36.89+9.48 = 46.37\%$ of a limit of 100%. The equipment is passing RF exposure requirements for 20cm distance.

5.3 Routine Environmental Evaluation Applicability Simultaneous Transmission

Possible simultaneous transmissions: According to the manufacturer, the two radio modules incorporated within the device operate independently from each other. Theoretically, the worst case of simultaneous transmission is with two transmitters operating at the highest output power mode, within the same band (ISM+ Band 5).

| Transmission Mode | Sum of the Ratios for the Highest Possible Simultaneous Operation | Limits for the Highest Combined Ratio | Exempt from Routine evaluation |
|-------------------|---|---------------------------------------|--------------------------------|
| ISM + UMTS V | $0.095 + 0.369 = 0.46$ | < 1 | Yes |

Note: Power Density to Applicable limit for Stand Alone Operation are derived from table in section 5.2

Conclusion:

- The equipment meets the MPE requirements limits for simultaneous transmission for distance greater than or equal to 20 cm.

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5. Revision History

| Date | Report Name | Changes to report | Report prepared by |
|-------------|----------------------------------|--------------------------|---------------------------|
| 2019-11-27 | EMC_TELUL-076-19001_FCC_ISED_MPE | Initial version | Chin Ming Lui |