



Evaluation of RF Exposure for AirCard 880U Wireless Modem as a Mobile Device

In this application we seek modular approval to the AIRCARD 880U wireless modem for use in mobile configuration. Based on the FCC OET Bulletin 65 Supplement C and 47 CFR §2.1091, we have concluded that the AIRCARD 880E will comply with the FCC rules on RF exposure for mobile devices if the antenna gain does not exceed 5 dBi in cellular band and 4 dBi in PCS band. The following analysis will demonstrate such compliance. The analysis will be done in two US bands.

Operation in cellular band (824 – 849 MHz)

The peak conducted output power of AIRCARD 880E in cellular band is 32 dBm. Take the worst case as an example, in which an antenna with 5 dBi gain is used. The resulted power density at a distance of 20 cm can be deducted as follows:

$$\begin{aligned} \text{EIRP} &= 32 + 5 = 37 \text{ dBm} = 5012 \text{ mW} \\ \text{Power Density} &= \text{EIRP} * \text{DutyCycle} / (4\pi R^2) \\ &= 5012 * 0.5 / (4 * \pi * 20^2) = 0.50 \text{ mW/cm}^2 \\ &\text{where DutyCycle is 0.5 for GPRS operation (the worst case) and R is 20 cm.} \end{aligned}$$

The MPE limit for General Population/Uncontrolled Exposure is shown in the FCC OET Bulletin 65 Supplement C and can be calculated as follows:

$$\text{MPE limit} = 824/1500 = 0.55 \text{ mW/cm}^2$$

As we can see the resulted power density is below the MPE limit, therefore AIRCARD 880U in cellular band is compliant with the FCC rules on RF exposure.

Operation in PCS band (1850 – 1910 MHz)

The peak conducted output power of AIRCARD 880U in PCS band is 29 dBm. Take the worst case as an example, in which an antenna with 4 dBi gain is used. The resulted ERP can be expressed as follows:

$$\text{ERP} = 29 + 4 - 2.15 = 30.85 \text{ dBm} (1.22 \text{ W}) < 3 \text{ W}$$

The FCC OET Bulletin 65 Supplement C states that mobile devices identified in 47 CFR §2.1091 that operate at frequencies above 1.5 GHz with an ERP of 3.0 watts or more are required to perform routine environmental evaluation for RF exposure prior to equipment authorization or use; otherwise, they are categorically excluded.

As we can see this resulted ERP is below 3 W, therefore routine environmental evaluation for RF exposure prior to equipment authorization or use for AIRCARD 880U in PCS band is categorically excluded.