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Report No.: 2112RSU004-U5 Report Version: V01 Issue Date: 2022-06-20

RF Exposure Evaluation Declaration

FCC ID: P27ME4221 Applicant: Sercomm Corporation **Application Type:** Certification **Product:** Dual Band WiFi Mesh Model No.: **AME-4221SR Brand Name:** Airtel FCC Classification: Digital Transmission System (DTS) Unlicensed National Information Infrastructure (NII) FCC Rule Part(s): 47 CFR Part 2.1091 Test Procedure(s): KDB 447498 D04v01 **Reviewed By: Approved By:** TESTING LABORATORY CERTIFICATE #3628.01

The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

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Revision History

Report No.	Version	Description	Issue Date	Note
2112RSU004-U5	Rev. 01	Initial Report	2022-06-20	Valid



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1. General Information

1.1. Applicant

Sercomm Corporation

8F, No. 3-1, YuanQu St., NanKang, Taipei 115, Taiwan, R.O.C.

1.2. Manufacturer

Sercomm Corporation

8F, No. 3-1, YuanQu St., NanKang, Taipei 115, Taiwan, R.O.C.

1.3. Testing Facility

\boxtimes	Test Site – MRT Suzhou Laboratory Laboratory Location (Suzhou - Wuzhong) D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China					
	Laboratory Location (Suzhou - SIP)					
	4b Building, Liando U Valley, No.200 Xingpu Rd., Shengpu Town, Suzhou Industrial Park, China					
	Laboratory Accreditations					
	A2LA: 3628.01		CNAS	5: L10551		
	FCC: CN1166		ISED:	CN0001		
	VCCI:	□R-20025	□G-20034	□C-20020	□T-20020	
	VCCI:	□R-20141	□G-20134	□C-20103	□T-20104	
	Test Site – MRT Shenzhen Laboratory					
	Laboratory Location (Shenzhen)					
	1G, Building A, Junxiangda Building, Zhongshanyuan Road West, Nanshan District, Shenzhen,					
	China					
	Laboratory Accre	editations				
	A2LA: 3628.02 CNAS: L10551					
	FCC: CN1284 ISED: CN0105					
	Test Site – MRT Taiwan Laboratory					
	Laboratory Location (Taiwan)					
	No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.)					
	Laboratory Accre	editations				
	TAF: L3261-19072	<u></u> 25				
FCC: 291082, TW3261 ISED: TW3261						



1.4. Product Information

Product Name	Dual Band WiFi Mesh			
Model No.	AME-4221SR			
Brand Name	Airtel			
Wi-Fi Specification	802.11a/b/g/n/ac			
Antenna Information	Refer to section 1.5			
Accessories				
Adapter 1#	Model No.: MSA-C2000IS12.0-24W-IN			
	Input Power: 90 - 270V ~ 50/60Hz, 0.7A max			
	Output Power: 12V dc 2.0A			
Adapter 2#	Model No.: NSA18E1-12015001			
	Input Power: 100 - 240V ~ 50/60Hz, 1.0A max			
	Output Power: 12V dc 1.5A			

Remark:

 The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer.

1.5. Antenna Details

Antenna Type	Frequency Band	Tx	Max Antenna	Beamforming	CDD Direc	tional Gain
	(MHz)	Paths	Gain	Directional Gain	(dl	Bi)
			(dBi)	(dBi)	For Power	For PSD
	2412 ~ 2462	2	3.10		3.10	6.11
	5180 ~ 5240	2	2.90	5.91	2.90	5.91
PIFA Antenna	5260 ~ 5320	2	3.50	6.51	3.50	6.51
	5500 ~ 5720	2	3.50	6.51	3.50	6.51
	5745 ~ 5825	2	3.40	6.41	3.40	6.41

Remark:

- The EUT supports Cyclic Delay Diversity (CDD) mode and CDD signals are correlated.
 If all antennas have the same gain, G_{ANT}, Directional gain = G_{ANT} + Array Gain, where Array Gain is as follows.
 - For power spectral density (PSD) measurements on all devices,
 Array Gain = 10 log (N_{ANT}/ N_{SS}) dB;
 - For power measurements on IEEE 802.11 devices,
 Array Gain = 0 dB for N_{ANT} ≤ 4;
- 2. The EUT also supports Beam Forming mode, and the Beam Forming support 802.11n/ac for 5G Wi-Fi, not include 802.11a for 5G Wi-Fi and 2.4G Wi-Fi. BF Directional gain = G_{ANT} + 10 log (N_{ANT}).



2. RF Exposure Evaluation

2.1. Test Limits

According to §1.1310: The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency (RF) radiation as specified in §1.1307(b)

LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency Range	Electric Field	Magnetic Field	Power Density	Average Time			
(MHz)	Strength (V/m)	Strength (A/m)	(mW/cm ²)	(Minutes)			
	(A) Limits for Occupational/ Control Exposures						
0.3-3.0	614	1.63	*(100)	≤6			
3.0-30	1842/f	4.89/f	*(900/f²)	<6			
30-300	61.4	0.163	1.0 <6				
300-1,500			f/300	<6			
1,500-100,000			5	<6			
(B) Limits for General Population/ Uncontrolled Exposures							
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	0.2 <30			
300-1,500			f/1500	<30			
1,500-100,000			1.0	<30			

f= frequency in MHz. * = Plane-wave equivalent power density.



2.2. Test Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(ii)(A) of this section.

Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \ cm} (d/20 \ \text{cm})^x & d \leq 20 \ \text{cm} \\ ERP_{20 \ cm} & 20 \ \text{cm} < d \leq 40 \ \text{cm} \end{cases}$$

Where

$$x = -\log_{10}\left(\frac{60}{ERP_{20\ cm}\sqrt{f}}\right)$$
 and f is in GHz;

and

$$\mathit{ERP}_{20\;cm}\;(\mathrm{mW}) = \begin{cases} 2040f & 0.3\;\mathrm{GHz} \le f < 1.5\;\mathrm{GHz} \\ \\ 3060 & 1.5\;\mathrm{GHz} \le f \le 6\;\mathrm{GHz} \end{cases}$$

d = the separation distance (cm);

(Option C) Or using Table 1 and the minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. For the exemption in Table 1 to apply, R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole (1.64 linear value).



	Table 1 to §1.1307((3)(i)(C) - Single RF Sources	Subject to Routine Environmental Evaluation
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RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	1920R ²
1.34-30	3450R ² /f ²
30-300	3.83R ²
300-1,500	0.0128R ² /f
1,500-100,000	19.2R ²

For multiple RF sources: Multiple RF sources are exempt if:

(A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those is paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(B) in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

$$\sum_{i=1}^{a} \frac{P_i}{P_{th,i}} + \sum_{j=1}^{b} \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^{c} \frac{Evaluated_k}{Exposure\ Limit_k} \le 1$$

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

 P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

 $P_{th,i}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

 ERP_j = the ERP of fixed, mobile, or portable RF source j.





ERP_{th,j} = exemption threshold ERP for fixed, mobile, or portable RF source j, at a distance of at least $\lambda/2\pi$ according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

Evaluated_k = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

Exposure Limit_k = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k, as applicable from §1.1310 of this chapter.



2.3. Test Result

Product	Dual Band WiFi Mesh
Test Item	RF Exposure Evaluation

Test Mode	Frequency Band (MHz)	Max Conducted Power (dBm)	Tune-up Power (dBm)	Antenna Gain (dBi)	Max ERP (dBm)
802.11b/g/n	2412 ~ 2462	29.85	30.00	3.10	33.10
	5180 ~ 5240	29.29	30.00	2.90	32.90
802.11a/n/ac	5260 ~ 5320	23.96	24.00	3.50	27.50
(CDD Mode)	5500 ~ 5720	23.92	24.00	3.50	27.50
	5745 ~ 5825	26.47	27.00	3.40	30.40
	5180 ~ 5240	29.29	30.00	5.91	35.91
802.11n/ac	5260 ~ 5320	23.96	24.00	6.51	30.51
(BF Mode)	5500 ~ 5720	23.92	24.00	6.51	30.51
	5745 ~ 5825	26.47	27.00	6.41	33.41

Note:

- 1. The level of max peak power was from RF report 2112RSU004-U2 and 2112RSU004-U3.
- 2. Tune-up power declared by manufacturer.

For multiple RF sources

Frequency (MHz)	Max ERP (Watts)	λ / 2 π (cm)	R (cm)	Option C (Watts)
2412	2.042	1.98	56	6.021
5180	3.899	0.92	56	6.021
5260	1.125	0.91	56	6.021
5500	1.125	0.87	56	6.021
5745	2.193	0.83	56	6.021

Simultaneous analysis

Exposure ratio = 2.042 / 6.021 + 3.899 / 6.021 = 0.987 < 1

CONCLUSION:

WLAN 2.4GHz and WLAN 5GHz can transmit simultaneously.

Therefore, the min compliance distance is 56cm.