



attn: Reviewing Engineer
MET Laboratories, Inc.
914 West Patapsco Avenue
Baltimore, MD 21230

January 9, 2007

RE: RF exposure information FCC ID: QOQWRAPAS229X

<u>FCC ID Number</u>	<u>Product</u>	<u>Title/Model</u>
QOQWRAPAS229X		Bluetooth Access Server/ WRAP Access Server

TO WHOM IT MAY CONCERN

The product **WRAP Access Server** is designed to be used as an access point. This transmitter must be installed to provide a separation distance of at least 20 cm from everybody.

The table below is excerpted from Table 1B of 47 CFR 1.1310 titled Limits for Maximum Permissible Exposure (MPE), Limits for General Population/Uncontrolled Exposure:

Frequency Range (MHz)	Power Density (mW/cm ²)
300 – 1500	f/1500
1500 – 100.000	1.0

The equipment **WRAP Access Server** transmits in the 2400 - 2483.5 MHz frequency range, so the applicable MPE limit is 1 mW/cm². The equipment can be provided with up to 4 Bluetooth modules WT11# (FCC ID: QOQWT11):

Under the conditions stated above MPE limits can be guaranteed as the calculation below shows:

When provided with the four Bluetooth modules (worst case) (WT11# (FCC ID: QOQWT11) (please refer to page 12 of the test report 24407RET.101):

Measured maximum peak output power (e.i.r.p.) = 12.43 dBm at 2441 MHz = 17.50 mW e.i.r.p.

Using Equation from page 18 of OET Bulletin 65, Edition 97-01:

$$S = P \cdot G / 4\pi R^2 = \text{Prad (e.i.r.p.)} / 4\pi R^2$$

Where,

S = power density in mW/cm² (1 mW/cm² used for G)

P = power input to the antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the centre of radiation of the antenna in cm (20 cm Prediction distance)

We obtain the following results:

Maximum EIRP (dB)	Maximum E.I.R.P. (mW)	R - Prediction distance (cm)	S – Power density (mW/cm ²)
12.43	17.50	20	0.003481

The equipment can be provided with up to 4 Bluetooth modules and additionally the equipment has a Compact Flash slot, where an additional transmitter (WLAN, GPRS, etc.) can be installed.

In this case, the total power density at a distance of 20 cm from the device is the sum of the power density from each transmitter (worst case):

$$S_{\text{Total}} = S_{\text{Bluetooth}} + S_{\text{Compact Flash card}} = 0.003481 \text{ mW/cm}^2 + S_{\text{Compact Flash card}}$$

Reminding that MPE limit is 1 mW:

$$S_{\text{Total}} < 1 \text{ mW/cm}^2$$

$$0.003481 \text{ mW/cm}^2 + S_{\text{Compact Flash card}} < 1 \text{ mW/cm}^2$$

$$S_{\text{Compact Flash card}} < 1 \text{ mW/cm}^2 - 0.003481 \text{ mW/cm}^2 = 0.996519 \text{ mW/cm}^2$$

$$S_{\text{Compact Flash card}} < 0.996519 \text{ mW/cm}^2$$

$$\text{Prad (e.i.r.p.)}_{\text{Compact Flash card}} / 4\pi R^2 < 0.996519 \text{ mW}$$

Where $R = 20 \text{ cm}$

We obtain the following result:

$$\text{Prad (e.i.r.p.)}_{\text{Compact Flash card}} < 5009,049779 \text{ mW} = 37.00 \text{ dBm}$$

In the following paragraphs we will present some examples to demonstrate the compliance of the device in different situations:

Example 1: 15.247 or 15.407 Compact Flash Card with maximum allowed e.i.r.p. of 4 W

Using Equation from page 18 of OET Bulletin 65, Edition 97-01:

$$S_{\text{Compact Flash card}} = \text{Prad (e.i.r.p.)}_{\text{Compact Flash card}} / 4\pi R^2 = 4000 \text{ mW} / 4\pi (20 \text{ cm})^2$$

$$S_{\text{Compact Flash card}} = 0.795774 \text{ mW/cm}^2$$

$$S_{\text{Total}} = S_{\text{Bluetooth}} + S_{\text{Compact Flash card}} = 0.003481 \text{ mW/cm}^2 + 0.795774 \text{ mW/cm}^2 =$$

$$S_{\text{Total}} = 0.799255 \text{ mW/cm}^2 < 1 \text{ mW/cm}^2$$

Example 2: Part 22 Compact Flash Card with maximum e.i.r.p. of 1.5 W (Category excluded of MPE evaluation according to §2.1091)

Using Equation from page 18 of OET Bulletin 65, Edition 97-01 and considering that e.i.r.p. = 1.64 x e.r.p.:

$$S_{\text{Compact Flash card}} = \text{Prad (e.i.r.p.)}_{\text{Compact Flash card}} / 4\pi R^2 = 1500 \cdot 1.64 \text{ mW} / 4\pi (20 \text{ cm})^2$$

$$S_{\text{Compact Flash card}} = 0.489401 \text{ mW/cm}^2$$

$$S_{\text{Total}} = S_{\text{Bluetooth}} + S_{\text{Compact Flash card}} = 0.003481 \text{ mW/cm}^2 + 0.489401 \text{ mW/cm}^2 =$$

$$S_{\text{Total}} = 0.492882 \text{ mW/cm}^2 < 1 \text{ mW/cm}^2$$

Example 3: Part 24 Compact Flash Card with maximum e.i.r.p. of 3 W (Category excluded of MPE evaluation according to §2.1091)

Using Equation from page 18 of OET Bulletin 65, Edition 97-01 and considering that e.i.r.p. = 1.64 x e.r.p.:

$$S_{\text{Compact Flash card}} = \text{Prad (e.i.r.p.)}_{\text{Compact Flash card}} / 4\pi R^2 = 3000 \cdot 1.64 \text{ mW} / 4\pi (20 \text{ cm})^2$$

$$S_{\text{Compact Flash card}} = 0.978803 \text{ mW/cm}^2$$

$$S_{\text{Total}} = S_{\text{Bluetooth}} + S_{\text{Compact Flash card}} = 0.003481 \text{ mW/cm}^2 + 0.978803 \text{ mW/cm}^2 =$$

$$S_{\text{Total}} = 0.982284 \text{ mW/cm}^2 < 1 \text{ mW/cm}^2$$

This prediction demonstrates that:

The power density levels at a distance of 20 cm are below the maximum levels allowed by the FCC rules providing that the transmitter installed (co-located) in the CF slot will have a radiated transmitting power of 37 dBm.

Conclusion:

The equipment *WRAP Access Server* complies with the MPE, if it is installed to provide a separation distance of at least 20 cm from everybody.

Sincerely,

P.A.



Mr. Mikael Björkas
Director of Production
Bluegiga Technologies Inc.
Sinikalliontie 11, 02631 Espoo, Finland
Phone: +358 40 848 3339
E-mail: Mikael.Bjorkas@bluegiga.com