**DEKRA Testing and Certification, S.A.U.**
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Test report No:
NIE: 58611RAN.002

# Assessment report
## RF EXPOSURE REPORT ACCORDING TO
FCC 47 CFR Part 2.1091
ISED RSS-102 Issue 5:2015
IEEE Std C95.3™ -2002 (R2008)

| | |
|---|---|
| Identification of item tested | Companion module |
| Trademark | Telit |
| Model and /or type reference | WE866C3-P |
| Other identification of the product | FCC ID: RI7WE866C3<br>IC ID: 5131A–WE866C3<br>HW version: CS1929a-A<br>SW Version: Host SW V_25.20.000-B010 |
| Features | BT BR/EDR/LE 4.2 + Wifi a/b/g/n/ac (wave 1=> Max BW= 80 MHz) |
| Manufacturer | TELIT AUTOMOTIVE SOLUTIONS<br>Esplanade Anton Philips 14460 Colombelles, France |
| Test method requested, standard | IEEE Std C95.3™ -2002 (R2008). IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to Such Fields, 100 kHz–300 GHz<br>FCC 47 CFR Part 2.1091 Radiofrequency radiation exposure evaluation: mobile devices.<br>ISED RSS-102 Issue 5 (2015-03) – Radio Frequency Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands) |
| Summary | IN COMPLIANCE |
| Approved by (name / position & signature) | Miguel Lacave<br>Antennas Lab Manager<br>  MIGUEL LACAVE GARCÍA 2019.05.03 12:00:04 +02'00' |
| Date of issue | 2019-05-03 |
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# Data provided by the client

The device under evaluation consist of a companion module, supporting Wi-Fi 802.11 a/b/g/n/ac (wave 1) and BT (BR/EDR/LE(4.2)). It supports single RF antenna port for both technologies Wifi and BT. SDIO and HCI I/F, respectively for Wi-Fi and BT control. Module is controlled via a host Telit module, LE920A4 or LE910C1

DEKRA declines any responsibility with respect to the information provided by the client and that may affect the validity of results.

# Identification of the client

TELIT AUTOMOTIVE SOLUTIONS

Esplanade Anton Philips 14460 Colombelles, France

# Document history

| Report number | Date | Description |
|---|---|---|
| 58611RAN.002 | 2019-05-03 | First release |

# General description of the device under evaluation

The device under evaluation consist of a companion module, supporting Wi-Fi 802.11 a/b/g/n/ac (wave 1) and BT (BR/EDR/LE(4.2)). It supports single RF antenna port for both technologies Wifi and BT. SDIO and HCI I/F, respectively for Wi-Fi and BT control. Module is controlled via a host Telit module, LE920A4 or LE910C1.

According to the manufacturer, during its normal use, the separation distance between the device and the body of nearby users will be greater than 20 cm. In order to perform the assessment a conservative separation distance of 20 cm has been used.

The equipment specifications declared by the manufacturer for each supported technology and band are:

| Band (MHz) | Technology* | Band | Maximum RF output power (incl. tune-up) (dBm) | Max. Antenna gain (dBi) | Maximum E.I.R.P. (dBm) |
|---|---|---|---|---|---|
| 2412-2480 | Wi-Fi 802.11b/g/n | ISM | 18.0 | +2.5 | 20.5 |
| 5170-5725 | Wi-Fi 802.11a/n/ac | U-NII | 16.5 | +4.5 | 21.0 |
| 2402-2480 | Bluetooth BR/RDR/LE | ISM | 3.9 | +2.5 | 6.4 |

**Table 1:** Equipment specifications

*Note: Only the maximum output power mode has been taken into account as a worst case mode for technologies with different transmission modes that use the same module and antenna at the same transmission frequency range.

# Assessment summary

| Radiofrequency radiation exposure limits | | | | |
|---|---|---|---|---|
| **FCC 47 CFR § 2.1091 & ISED RSS-102 Issue 5 (2015-03)** | | | | |
| **Assessment** | **Band (MHz)** | **Technology** | **Band** | **VERDICT (Pass/Fail)** |
| 1 | 2450 | Wi-Fi | ISM | Pass |
| 2 | 5000 | Wi-Fi | U-NII | Pass |
| 3 | 2450 | Bluetooth | ISM | Pass |

**Table 2:** Assessment summary

# **Appendix A:** FCC RF Exposure

# FCC RF Exposure evaluation for mobile devices

Devices operating in standalone mobile device exposure conditions may contain a single transmitter or multiple transmitters that do not transmit simultaneously. A minimum test separation distance ≥ 20 cm is required between the antenna and radiating structures of the device and nearby persons to apply mobile device exposure limits. The distance must be at least 20 cm and fully supported by the operating and installation configurations of the transmitter and its antenna(s), according to the source-based time-averaged maximum power requirements of § 2.1091(d)(2). In cases where cable losses or other attenuations are applied to determine compliance, the most conservative operating configurations and exposure conditions must be evaluated. The minimum test separation distance required for a device to comply with mobile device exposure conditions must be clearly identified in the installation and operating instructions, for all installation and exposure conditions, to enable users and installers to comply with RF exposure requirements. For mobile devices that have the potential to operate in portable device exposure conditions, similar to the configurations described in § 2.1091(d)(4), a KDB inquiry is required to determine the SAR test requirements for demonstrating compliance.

When a device qualifies for the categorical exclusion provision of § 2.1091(c), the minimum test separation distance may be estimated, when applicable, by simple calculations according to plane-wave equivalent conditions, to ensure the transmitter and its antenna(s) can operate in manners that meet or exceed the estimated distance. The source-based time-averaged maximum radiated power, according to the maximum antenna gain, must be applied to calculate the field strength and power density required to establish the minimum test separation distance. When the estimated test separation distance becomes overly conservative and does not support compliance, MPE measurement or computational modeling may be used to determine the required minimum separation distance.

According to §1.1310 Radiofrequency radiation exposure limits, paragraph (e), the limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields are:

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

| Frequency range (MHz) | Electric field strength (V/m) | Magnetic field strength (A/m) | Power density (mW/cm²) | Averaging time (minutes) |
|---|---|---|---|---|
| **(A) Limits for Occupational/Controlled Exposure** | | | | |
| 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 Exposure** | | | | |
| 0.3–1.34 | 614 | 1.63 | *100 | 30 |
| 1.34–30 | 824/f | 2.19/f | *180/f² | 30 |
| 30–300 | 27.5 | 0.073 | 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

# FCC MPE Evaluation Results

Each supported transmission technology will be evaluated to determine if it is in compliance with limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields.

In order to perform the assessment, the following equations have been used for the calculations; these equations are accurate in the far-field of an antenna and will over-predict power density in the near field, where they could be used for making a "worst case" or conservative prediction:

Power density: $S[mW/cm^2] = \frac{P_{E.I.R.P.}[mW]}{4\Pi R[cm]^2}$

Minimum compliance distance: $R_{\min}[cm] = \sqrt{\frac{P_{E.I.R.P.}[mW]}{4\Pi S[mW/cm^2]}}$

Where:

$S$ = power density

$P_{E.I.R.P.}$ = Equivalent isotropically radiated power

$R$ = distance to the center of radiation of the antenna (evaluation distance)

$R_{\min}$ = distance to the center of radiation of the antenna

**Assessment 1 – Wi-Fi 2.45 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 18.0 |
| Maximum antenna Gain (dBi): | 2.5 |
| Minimum use distance (cm): | 20.0 |
| Worst Case Frequency (MHz): | 2412.0 |
| Maximum EIRP (dBm): | 20.5 |
| Maximum EIRP (mW): | 112.2 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (mW/cm$^2$): | 0.22 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |
| Verdict for general population: | PASS |

The power density level for this transmission mode is below general population exposure power density limit.

**Assessment 2 – Wi-Fi 5 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 16.5 |
| Maximum antenna Gain (dBi): | 4.5 |
| Minimum use distance (cm): | 20.0 |
| Worst Case Frequency (MHz): | 5170.0 |
| Maximum EIRP (dBm): | 21.0 |
| Maximum EIRP (mW): | 125.89 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (mW/cm$^2$): | 0.025 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |
| Verdict for general population: | PASS |

The power density level for this transmission mode is below general population exposure power density limit.

**Assessment 3 – Bluetooth 2.45 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 3.9 |
| Maximum antenna Gain (dBi): | 2.5 |
| Minimum use distance (cm): | 20.0 |
| Worst Case Frequency (MHz): | 2402.0 |
| Maximum EIRP (dBm): | 6.4 |
| Maximum EIRP (mW): | 4.37 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (mW/cm$^2$): | 0.00087 |
| General population - Power density limit (mW/cm$^2$): | 1.0 |
| Verdict for general population: | PASS |

The power density level for this transmission mode is below general population exposure power density limit.

# **Appendix B:** ISED RF Exposure

# ISED RF Exposure evaluation for mobile devices

According to RSS-102 Issue 5, Paragraph "4. Exposure Limits", Industry of Canada has adopted the RF field strength limits established in Health Canada's RF exposure guideline, Safety code 6:

**Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)**

| Frequency Range (MHz) | Electric Field (V/m rms) | Magnetic Field (A/m rms) | Power Density ($W/m^2$) | Reference Period (minutes) |
|---|---|---|---|---|
| 0.003-10[21] | 83 | 90 | - | Instantaneous* |
| 0.1-10 | - | $0.73/f$ | - | 6** |
| 1.1-10 | $87/f^{0.5}$ | - | - | 6** |
| 10-20 | 27.46 | 0.0728 | 2 | 6 |
| 20-48 | $58.07/f^{0.25}$ | $0.1540/f^{0.25}$ | $8.944/f^{0.5}$ | 6 |
| 48-300 | 22.06 | 0.05852 | 1.291 | 6 |
| 300-6000 | $3.142f^{0.3417}$ | $0.008335f^{0.3417}$ | $0.02619f^{0.6834}$ | 6 |
| 6000-15000 | 61.4 | 0.163 | 10 | 6 |
| 15000-150000 | 61.4 | 0.163 | 10 | $616000/f^{1.2}$ |
| 150000-300000 | $0.158f^{0.5}$ | $4.21 \times 10^{-4} f^{0.5}$ | $6.67 \times 10^{-5} f$ | $616000/f^{1.2}$ |

**Note:** $f$ is frequency in MHz.
*Based on nerve stimulation (NS).
** Based on specific absorption rate (SAR).

**Table 6: RF Field Strength Limits for Controlled Use Devices (Controlled Environment)**

| Frequency Range (MHz) | Electric Field (V/m rms) | Magnetic Field (A/m rms) | Power Density ($W/m^2$) | Reference Period (minutes) |
|---|---|---|---|---|
| 0.003-10[23] | 170 | 180 | - | Instantaneous* |
| 0.1-10 | - | $1.6/f$ | - | 6** |
| 1.29-10 | $193/f^{0.5}$ | - | - | 6** |
| 10-20 | 61.4 | 0.163 | 10 | 6 |
| 20-48 | $129.8/f^{0.25}$ | $0.3444/f^{0.25}$ | $44.72/f^{0.5}$ | 6 |
| 48-100 | 49.33 | 0.1309 | 6.455 | 6 |
| 100-6000 | $15.60f^{0.25}$ | $0.04138f^{0.25}$ | $0.6455f^{0.5}$ | 6 |
| 6000-15000 | 137 | 0.364 | 50 | 6 |
| 15000-150000 | 137 | 0.364 | 50 | $616000/f^{1.2}$ |
| 150000-300000 | $0.354f^{0.5}$ | $9.40 \times 10^{-4} f^{0.5}$ | $3.33 \times 10^{-4} f$ | $616000/f^{1.2}$ |

**Note:** $f$ is frequency in MHz.
*Based on nerve stimulation (NS).
** Based on specific absorption rate (SAR).

# ISED MPE Evaluation Results

Each supported transmission technology will be evaluated to determine if it is in compliance with RSS-102 Issue 5, RF Field Strength Limits for devices used by the General Public.

In order to perform the assessment, the following equations have been used for the calculations; these equations are accurate in the far-field of an antenna and will over-predict power density in the near field, where they could be used for making a "worst case" or conservative prediction:

Power density: $S[W/m^2] = \frac{P_{E.I.R.P.}[W]}{4\Pi R[m]^2}$

Minimum compliance distance: $R_{\min}[m] = \sqrt{\frac{P_{E.I.R.P.}[W]}{4\Pi S[W/m^2]}}$

Where:

$S$ = power density

$P_{E.I.R.P.}$ = Equivalent isotropically radiated power

$R$ = distance to the center of radiation of the antenna (evaluation distance)

$R_{\min}$ = distance to the center of radiation of the antenna

**Assessment 1 – Wi-Fi 2.45 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 18.0 |
| Maximum antenna gain (dBi): | 2.5 |
| Minimum use distance (m): | 0.2 |
| Worst Case Frequency (MHz): | 2412.0 |
| Maximum EIRP (dBm): | 20.5 |
| Maximum EIRP (W): | 0.11 |
| General public - Power density limit (W/m$^2$): | 5.366 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (W/m$^2$): | 0.223 |
| General public - Power density limit (W/m$^2$): | 5.366 |
| Verdict for general public: | PASS |

The power density level for this transmission mode is below general public power density limit.

**Assessment 2 – Wi-Fi 5 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 16.5 |
| Maximum antenna gain (dBi): | 4.5 |
| Minimum use distance (m): | 0.2 |
| Worst Case Frequency (MHz): | 5170.0 |
| Maximum EIRP (dBm): | 21.0 |
| Maximum EIRP (W): | 0.13 |
| General public - Power density limit (W/m$^2$): | 9.035 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (W/m$^2$): | 0.250 |
| General public - Power density limit (W/m$^2$): | 9.035 |
| Verdict for general public: | PASS |

The power density level for this transmission mode is below general public power density limit.

**Assessment 3 – Bluetooth 2.45 GHz Band**

| | |
|---|---|
| Maximum output power (dBm): | 3.9 |
| Maximum antenna gain (dBi): | 2.5 |
| Minimum use distance (m): | 0.2 |
| Worst Case Frequency (MHz): | 2402.0 |
| Maximum EIRP (dBm): | 6.4 |
| Maximum EIRP (W): | 0.004 |
| General public - Power density limit (W/m$^2$): | 5.35 |

**Power density at minimum use distance:**

| | |
|---|---|
| Power density (W/m$^2$): | 0.009 |
| General public - Power density limit (W/m$^2$): | 5.35 |
| Verdict for general public: | PASS |

The power density level for this transmission mode is below general public power density limit.