RF Exposure:

11) RF exposure information does not appear to be provided. RF exposure – Part 1.1307 REQUIRES Evaluation for Part 25. Calculations are not Evaluation under the rules. The term evaluation refers to actual measurements. Evaluation actually requires RF exposure measurements made with NARDA probes, etc. which requires a page or 2 of measurement method plus results following OET Bulletin No. 65, etc. In addition the calculations are also provided many time to support the distances tested (i.e. 110 cm listed above). Certain EMC labs can accommodate this testing.

As stated above, these evaluations are conducted at installation sites when the device is being installed before operation. All RF Exposure FCC rules to gain compliance are executed with MPE surveys/studies at these sites before turn-up. Notwithstanding, a representative MPE calculations was done by the EMC lab on this device using a typical (compatible) antenna's gain and listed in the test report.

12) Information regarding allowed antennas and/or gain does not appear to be provided. For evaluation of RF exposure – this is something that is needed to be known.

As stated above, these evaluations are conducted at installation sites when the device is being installed using selected antennas designated for each installation site. MPE surveys/studies are conducted to ensure sites are compliant and follow all FCC rules for operation/transmission. Many antennas could be used, as long as they don't violate the FCC limits for RF exposure, i.e., for the general public and occupational personnel.

Test Report – Part 25:

15) Figure 18 appears to show a second harmonic above the limits. If this plot is a prescan – and final data is later, please comment. Please review.

The plot in figure 18 was a prescan. Figure 19 on the other hand shows the final plot where this second harmonic is below the limit. This was how the EMC lab displayed this data, as you can see both have the same description.

16) For RF exposure – the power on page 31 appears different than page 16 by 1.2 dB. Please review.

This piece of information should be ignored as previously stated, as its not required for this application, but notwithstanding, the conducted power (dBm) had a +1dBm tune up tolerance which added 1dBm to 45.88dBm (page 16) to approximate the value to 47dBm (page 31) according to the EMC lab. As courtesy, this representative MPE calculations was done by the EMC lab using a typical (compatible) antenna's gain.