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1. Description of Equipment Under Test

EUT Type	WIFI/BT Module
FCC ID	S4LFF50
Brand Name	TomTom
Model Name	K019-CW43-DW
Tx Frequency Bands (Unit: MHz)	WLAN : 2412 ~ 2462, 5180 ~ 5240, 5260 ~ 5320, 5500 ~ 5700, 5745 ~ 5825 Bluetooth/LE : 2402 ~ 2480
Uplink Modulations	802.11b : DSSS 802.11a/g/n/ac : OFDM Bluetooth : GFSK, $\pi/4$ -DQPSK, 8-DPSK
HW Version	K019-CW43-DW-A4
SW version	wl0: Mar 18 2020 21:09:13 version 7.45.203 (r724662 CY) FWID 01-5c2ca542
Antenna Type	WLAN: Dipole Antenna
EUT Stage	Engineering sample

Note:

1. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

2. MPE(Maximum Permissible Exposure) Assessment

2.1 Introduction

According to 47 CFR §2.1091, a mobile device is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that a separation distance of at least 20 cm is normally maintained between the transmitting antenna and the body of the user or nearby persons. In this context, the term “fixed location” means that the device is physically secured at one location and is not able to be easily moved to another location. Transmitting devices designed to be used by consumers or workers that can be easily re-located, such as wireless devices associated with a personal computer, are considered to be mobile devices if they meet the 20 cm separation requirement. The limits to be used for MPE evaluation are specified in §1.1310. All unlicensed personal communications service (PCS) devices and unlicensed NII devices shall be subject to the limits for general population/uncontrolled exposure.

2.2 RF Radiation Exposure Limits

According to 47 CFR §1.1310, the criteria listed in below table shall be used to evaluate the environmental impact of human exposure to RF radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093.

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (min)
(A) Limits for Occupational / Controlled Exposures				
0.3 – 3.0	614	1.63	100	6
3.0 – 30	1842/f	4.89/f	900/f ²	6
30 – 300	61.4	0.163	1.0	6
300 – 1500	-	-	f/300	6
1500 – 100000	-	-	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	30
300 – 1500	-	-	f/1500	30
1500 – 100000	-	-	1.0	30

Limits for maximum permissible exposure (MPE)

Notes:

1. f = frequency in MHz
2. Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided they are made aware of the potential for exposure.
3. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

2.3 MPE Assessment Method

Calculations can be made to predict RF field strength and power density levels around typical RF sources. For example, in the case of a single radiating antenna, a prediction for power density in the far-field of the antenna can be made by use of the general Equations below. This equation is generally accurate in the far-field of an antenna but will over-predict power density in the near field, where they could be used for making a "worst case" or conservative prediction.

$$\text{Power Density (S)} = \frac{PG}{4\pi R^2} = \frac{\text{EIRP}}{4\pi R^2}$$

Where

S = Power Density, unit in mW/cm²

P = Power input to the antenna, unit in mW

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

R = Distance to the center of radiation of the antenna, unit in cm

EIRP = Effective isotropically radiated power

2.4 MPE Calculation for Standalone Operations

The manufacturer expects that the radiated component of this device will not close to the human body during normal usage and the warning statement was also stated in the user instruction. Since the transmitting antenna will be kept at least 20 cm away from the human body, the MPE level is calculated based on this condition and the result is listed in below table.

BT

Band	Antenna Gain (dBi)	Maximum Power (dBm)	Average EIRP (mW)	Power Density (mW/cm ²)	Limit (mW/cm ²)	Power Density / Limit	Result
Bluetooth	1.5	8.5	1.259	0.000	1.000	0.000	Pass
BT_LE (1M)	1.5	8.5	1.259	0.000	1.000	0.000	

WIFI 2.4G

Band	Antenna Gain (dBi)	Maximum Power (dBm)	Average EIRP (mW)	Power Density (mW/cm ²)	Limit (mW/cm ²)	Power Density / Limit	Result
WIFI 2.4G	1.5	16.0	56.234	0.011	1.000	0.011	Pass

Wifi 5G

Band	Antenna Gain (dBi)	Maximum Power (dBm)	Average EIRP (mW)	Power Density (mW/cm ²)	Limit (mW/cm ²)	Power Density / Limit	Result
BAND 1	5	14.0	79.433	0.016	1.000	0.016	Pass
BAND 2	5	14.0	79.433	0.016	1.000	0.016	Pass
BAND 3	5	14.5	89.125	0.018	1.000	0.018	Pass
BAND 4	2	13.5	35.481	0.007	1.000	0.007	Pass

Summary:

Since the ERP (effective radiated power) operated at < 1.5 GHz is less than 1.5 watts and > 1.5 GHz is less than 3 watts, the routine environmental evaluation is not required, and the MPE result calculated for this device complies with the MPE limit as specified in 47 CFR §1.1310.

3. Information on the Testing Laboratories

We, BV 7LAYERS COMMUNICATIONS TECHNOLOGY (SHENZHEN) CO. LTD., were founded in 2015 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

If you have any comments, please feel free to contact us at the following:

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The road map of all our labs can be found in our web site also.

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