



**FCC Part 1 Subpart I  
FCC Part 2 Subpart J  
INDUSTRY CANADA RSS 102 ISSUE 3**

**RF EXPOSURE REPORT**

**FOR**

**DUAL-BAND 802.11a/b/g/n ACCESS POINT**

**MODEL NUMBER: ZONEFLEX 7351**

**FCC ID: S9GZF7351**

**IC: 5912A-ZF7351**

**REPORT NUMBER: 12U14419-35, Revision D**

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Revision History

<u>Rev.</u>	<u>Issue Date</u>	<u>Revisions</u>	<u>Revised By</u>
--	01/08/13	Initial Issue	F. Ibrahim
A	01/24/13	Changed output power values from PK to AVG, and removed 5.3 and 5.6 GHz band.	F. Ibrahim
B	01/28/13	Split the RF exposure table into two tables, one for 2.4+5.2 GHz, and the other is for 2.4+5.8 GHz.	F. Ibrahim
C	02/05/13	Added a statement about using maximum power in section 6.	F. Ibrahim
D	02/12/13	Revised section 6.	F. Ibrahim

## TABLE OF CONTENTS

<b>1. ATTESTATION OF TEST RESULTS .....</b>	<b>4</b>
<b>2. TEST METHODOLOGY .....</b>	<b>5</b>
<b>3. REFERENCES .....</b>	<b>5</b>
<b>4. FACILITIES AND ACCREDITATION .....</b>	<b>5</b>
<b>5. MAXIMUM PERMISSIBLE RF EXPOSURE .....</b>	<b>6</b>
5.1. <i>FCC RULES</i> .....	6
5.2. <i>IC RULES</i> .....	7
5.3. <i>EQUATIONS</i> .....	8
5.4. <i>LIMITS AND IC EXEMPTION</i> .....	10
<b>6. RF EXPOSURE RESULTS .....</b>	<b>11</b>

# 1. ATTESTATION OF TEST RESULTS

**COMPANY NAME:** RUCKUS WIRELESS, INC.  
350 WEST JAVA DRIVE CITY  
SUNNYVALE, CA 94089, USA

**EUT DESCRIPTION:** DUAL-BAND 802.11a/b/g/n ACCESS POINT

**MODEL:** ZONEFLEX 7351

**SERIAL NUMBER:** 301204006396

**DATE TESTED:** OCTOBER 01 - DECEMBER 04, 2012

APPLICABLE STANDARDS	
STANDARD	TEST RESULTS
FCC PART 1 SUBPART I & PART 2 SUBPART J	Pass
INDUSTRY CANADA RSS 102 ISSUE 3	Pass

UL CCS calculated the RF Exposure of the above equipment in accordance with the requirements set forth in the above standards, using test results reported in the test report documents referenced below and/or documentation furnished by the applicant. All indications of Pass/Fail in this report are opinions expressed by UL CCS based on interpretations of these calculations. The results show that the equipment is capable of demonstrating compliance with the requirements as documented in this report.

**Note:** The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. This document may not be altered or revised in any way unless done so by UL CCS and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL CCS will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, any agency of the Federal Government, or any agency of any government.

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## 2. TEST METHODOLOGY

All calculations were made in accordance with FCC OET Bulletin 65 Edition 97-01 and IC Safety Code 6.

## 3. REFERENCES

All measurements were made as documented in test reports UL CCS Document 12U14419-26 FCC IC DTS WLAN Report, in the 2.4GHz Bands and 12U14419-28 and 12U14419-29 FCC IC UNII WLAN Report for operation in the 5 GHz bands.

Output power, Duty cycle and Antenna gain data is excerpted from the applicable test reports.

## 4. FACILITIES AND ACCREDITATION

The test sites and measurement facilities used to collect data are located at 47173 Benicia Street, Fremont, California, USA.

UL CCS is accredited by NVLAP, Laboratory Code 200065-0. The full scope of accreditation can be viewed at <http://www.ccsemc.com>.

## 5. MAXIMUM PERMISSIBLE RF EXPOSURE

### 5.1. FCC RULES

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (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 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm <sup>2</sup> )	Averaging time (minutes)
(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 <sup>2</sup> )	6
30–300 .....	61.4	0.163	1.0	6
300–1500 .....	.....	.....	f/300	6
1500–100,000 .....	.....	.....	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/f <sup>2</sup> )	30

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)—Continued

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm <sup>2</sup> )	Averaging time (minutes)
30–300 .....	27.5	0.073	0.2	30
300–1500 .....	.....	.....	f/1500	30
1500–100,000 .....	.....	.....	1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

NOTE 1 TO TABLE 1: 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 he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: 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 can not exercise control over their exposure.

## 5.2. IC RULES

IC Safety Code 6, Section 2.2.1 (a) A person other than an RF and microwave exposed worker shall not be exposed to electromagnetic radiation in a frequency band listed in Column 1 of Table 5, if the field strength exceeds the value given in Column 2 or 3 of Table 5, when averaged spatially and over time, or if the power density exceeds the value given in Column 4 of Table 5, when averaged spatially and over time.

**Table 5**  
**Exposure Limits for Persons Not Classed As RF and Microwave Exposed Workers (Including the General Public)**

1 Frequency (MHz)	2 Electric Field Strength; rms (V/m)	3 Magnetic Field Strength; rms (A/m)	4 Power Density (W/m <sup>2</sup> )	5 Averaging Time (min)
0.003–1	280	2.19		6
1–10	280/ <i>f</i>	2.19/ <i>f</i>		6
10–30	28	2.19/ <i>f</i>		6
30–300	28	0.073	2*	6
300–1 500	1.585 <i>f</i> <sup>0.5</sup>	0.0042 <i>f</i> <sup>0.5</sup>	<i>f</i> /150	6
1 500–15 000	61.4	0.163	10	6
15 000–150 000	61.4	0.163	10	616 000 / <i>f</i> <sup>1.2</sup>
150 000–300 000	0.158 <i>f</i> <sup>0.5</sup>	4.21 x 10 <sup>-4</sup> <i>f</i> <sup>0.5</sup>	6.67 x 10 <sup>-5</sup> <i>f</i>	616 000 / <i>f</i> <sup>1.2</sup>

\* Power density limit is applicable at frequencies greater than 100 MHz.

- Notes:**
1. Frequency, *f*, is in MHz.
  2. A power density of 10 W/m<sup>2</sup> is equivalent to 1 mW/cm<sup>2</sup>.
  3. A magnetic field strength of 1 A/m corresponds to 1.257 microtesla (μT) or 12.57 milligauss (mG).

### **5.3. EQUATIONS**

#### **POWER DENSITY**

Power density is given by:

$$S = \text{EIRP} / (4 * \text{Pi} * \text{D}^2)$$

Where

S = Power density in mW/cm<sup>2</sup>  
EIRP = Equivalent Isotropic Radiated Power in mW  
D = Separation distance in cm

Power density in units of mW/cm<sup>2</sup> is converted to units of W/m<sup>2</sup> by multiplying by 10.

#### **DISTANCE**

Distance is given by:

$$D = \text{SQRT} (\text{EIRP} / (4 * \text{Pi} * S))$$

Where

D = Separation distance in cm  
EIRP = Equivalent Isotropic Radiated Power in mW  
S = Power density in mW/cm<sup>2</sup>

#### **SOURCE-BASED DUTY CYCLE**

Where applicable (for example, multi-slot cell phone applications) a duty cycle factor may be applied.

$$\text{Source-based time-averaged EIRP} = (\text{DC} / 100) * \text{EIRP}$$

Where

DC = Duty Cycle in %, as applicable  
EIRP = Equivalent Isotropic Radiated Power in W



**MIMO AND COLOCATED TRANSMITTERS (IDENTICAL LIMIT FOR ALL TRANSMITTERS)**

For multiple chain devices, and colocated transmitters operating simultaneously in frequency bands where the limit is identical, the total power density is calculated using the total EIRP obtained by summing the EIRP (in linear units) of each transmitter.

$$\text{Total EIRP} = (\text{EIRP1}) + (\text{EIRP2}) + \dots + (\text{EIRPn})$$

where

$$\text{EIRPx} = \text{Source-based time-averaged EIRP of chain x or transmitter x}$$

The total EIRP is then used to calculate the Power Density or the Distance as applicable.

**MIMO AND COLOCATED TRANSMITTERS**

For multiple colocated transmitters operating simultaneously in frequency bands where different limits apply:

The Power Density at the specified separation distance is calculated for each transmitter chain or transmitter.

The fraction of the exposure limit is calculated for each chain or transmitter as  
(Power Density of chain or transmitter) / (Limit applicable to that chain or transmitter).

The fractions are summed.

Compliance is established if the sum of the fractions is less than or equal to one.

## **5.4. LIMITS AND IC EXEMPTION**

### **VARIABLE LIMITS**

For mobile radio equipment operating in the cellular phone band, the lowest power density limit is calculated using the lowest frequency:

$$824 \text{ MHz} / 1500 = 0.55 \text{ mW/cm}^2 \text{ (FCC)}$$

$$824 \text{ MHz} / 150 = 5.5 \text{ W/m}^2 \text{ (IC)}.$$

### **FIXED LIMITS**

For operation in the PCS band, the 2.4 GHz band and the 5 GHz bands:

From FCC §1.1310 Table 1 (B), the maximum value of  $S = 1.0 \text{ mW/cm}^2$

From IC Safety Code 6, Section 2.2 Table 5 Column 4,  $S = 10 \text{ W/m}^2$

### **INDUSTRY CANADA EXEMPTION**

RSS-102 Clause 2.5.2 RF exposure evaluation is required if the separation distance between the user and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 1.5 GHz and the maximum e.i.r.p. of the device is equal to or less than 2.5 W;
- at or above 1.5 GHz and the maximum e.i.r.p. of the device is equal to or less than 5 W.

## 6. RF EXPOSURE RESULTS

In the table(s) below, Power and Gain are entered in units of dBm and dBi respectively and conversions to linear forms are used for the calculations.

2TX

Two chain or colocated transmitters										
Band	Mode	Chain for MIMO	Separatio Distance (cm)	Output Power (dBm)	Antenna Gain (dBi)	EIRP (dBm)	Duty Cycle (%)	EIRP (mW)	FCC Power Density (mW/cm <sup>2</sup> )	IC Density (W/m <sup>2</sup> )
2.4 GHz	WLAN	0		22.35	1.00	23.35	100.0	216.3		
2.4 GHz	WLAN	1		22.20	1.00	23.20	100.0	208.9		
5.2GHz	WLAN	0		13.85	2.00	15.85	100.0	38.5		
5.2GHz	WLAN	1		13.78	2.00	15.78	100.0	37.8		
Combined			20					501.5	0.100	1.00

Two chain or colocated transmitters										
Band	Mode	Chain for MIMO	Separatio Distance (cm)	Output Power (dBm)	Antenna Gain (dBi)	Duty Cycle (%)	EIRP (mW)	FCC Power Density (mW/cm <sup>2</sup> )	IC Density (W/m <sup>2</sup> )	
2.4 GHz	WLAN	0		22.35	1.00	100.0	216.3			
2.4 GHz	WLAN	1		22.20	1.00	100.0	208.9			
5.8GHz	WLAN	0		18.50	2.00	100.0	112.2			
5.8GHz	WLAN	1		18.15	2.00	100.0	103.5			
Combined			20				640.9	0.128	1.28	

### Notes:

- 1) The manufacturer configures output power so that the maximum power, after accounting for manufacturing tolerances, will never exceed the maximum power level measured
- 2) The output power in the tables above is the maximum power per chain among various channels and various modes within the specific band.
- 3) The antenna gain in the tables above is the maximum antenna gain among various channels within the specified band.

**END OF REPORT**