

5 FCC §2.1091, FCC §15.247(i) & ISEDC RSS-102 – RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i), Radio frequency devices operating under the provisions of this part are subject to the radio frequency radiation exposure requirements specified in §§ 1.1307(b), 1.1310, 2.1091, and 2.1093 of this chapter, as appropriate. Applications for equipment authorization of mobile or portable devices operating under this section must contain a statement confirming compliance with these requirements. Technical information showing the basis for this statement must be submitted to the Commission upon request.

According to FCC §2.1091 and §1.1310(e)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
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 ²)	30
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

According to ISEDC RSS-102 Issue 6 Section 6.6: Field reference level exposure exemption limits

Field reference level (FRL) exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm (i.e. mobile devices), except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 1 W (adjusted for tune-up tolerance)
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $4.49/f0.5W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance)
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $1.31 \times 10^{-2} f0.6834W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 5 W (adjusted for tune-up tolerance)

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the EIRP was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

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

5.3 MPE Result

Note: The Maximum power measurements were referenced from the test report: R2108A0712-M1 by TA Technology (Shanghai) Co., LTD, issued on 2021-09-07.

Note: 2.4GHz and 5 GHz Wi-Fi simultaneous transmission cannot be enabled by this device.

Band	Antenna Gain (dBi)	Maximum Power (dBm)	Maximum EIRP (dBm)	Maximum EIRP (mW)	Power Density at 20cm (mW/cm ²)	Limit (mW/cm ²)
BT	2.34	15	17.34	54.2	0.011	1.0
2.4 GHz Wi-Fi	2.34	19	21.34	136.1	0.027	1.0

Worst Case Sum of Ratios:

$$2.4 \text{ GHz Wi-Fi} + \text{BT}: 0.027/1.0 + 0.011/1.0 = 0.038 < 1$$

For this device, a separation distance of 20 cm complies with the Simultaneous transmission limit of ≤ 1.0 .

5.4 IC Exemption

2.4 GHz Wi-Fi:

The EIRP of this device is 21.34 dBm (136.1 mW) which is less than the exemption threshold, i.e., $1.31 \times 10^{-2} \times f^{(0.6834)} = 2.68 \text{ W}$. Therefore, the RF exposure evaluation is exempt.

BT:

The EIRP of this device is 17.34 dBm (54.2 mW) which is less than the exemption threshold, i.e., $1.31 \times 10^{-2} \times f^{(0.6834)} = 2.71 \text{ W}$. Therefore, the RF exposure evaluation is exempt.

Worst Case Sum of Ratios:

$$2.4 \text{ GHz Wi-Fi} + \text{BT}: 0.1361/2.68 + 0.0542/2.71 = 0.0707 < 1$$