

# **Exhibit: RF Exposure – FCC**

(FCC ID: WR9EBSTAT3LT01)

Report File #: 7169001182-000

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Client	Ecobee Inc	
Product	Ecobee3 Lite	SUD
Standard(s)	FCC Part 15 Subpart 15.247:2016 FCC KDB 447498:2015	Canada

# RF Exposure – FCC

The device is intended for use for mobile application and the minimum separation distance from the radiating structure to any part of the body or extremity of a user is greater than 20 cm as stated by the manufacturer during normal operation.

The EUT contains a 902 - 928 MHz FHSS transmitter and a 2400 - 2483.5 MHz DTS transmitter. The Firmware guarantees simultaneous will not occur. Antenna co-location testing is therefore not applicable.

# General SAR test exclusion guidance:

As per FCC KDB 447498 Section 4.3.1 b), the SAR Test Exclusion Threshold for 100 MHz to 6 GHz at test separation distances > 50 mm is determined by:

1) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm) $\cdot$ (f<sub>(MHz)</sub>/150)]} mW, for 100 MHz to 1500 MHz

2) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm) $\cdot$ 10]} mW, for > 1500 MHz and  $\leq$  6 GHz

Where:

Power allowed at *numeric threshold* for 50 mm in step a) (for 1-g SAR) is given by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] [ $\sqrt{f_{(GHz)}}$ ]  $\leq 3.0$ 

(max power of channel, including tune-up tolerance, mW)  $\leq [3.0 / \sqrt{f_{(GHz)}}] *$  [min. test separation distance, mm]

#### Where:

 $f_{(GHz)}$  is the RF channel transmit frequency in GHz (max. power of channel, including tune-up tolerance, mW) (min. test separation distance, mm)

# SAR Calculations: 2412 – 2462 MHz DTS transmitter

Power allowed at *numeric threshold* for 50 mm in step a)

(max power of channel, including tune-up tolerance, mW)  $\leq [3.0 / \sqrt{f_{(GHz)}}] *$  [min. test separation distance, mm]

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(max power of channel, including tune-up tolerance, mW)  $\leq [3.0 / \sqrt{(2.462 \text{ GHz})}] * [50 \text{ mm})$ 

(max power of channel, including tune-up tolerance, mW)  $\leq$  95.6 mW

Therefore SAR Exclusion for 200 mm test distance is

{[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm) $\cdot$ 10]} mW, for > 1500 MHz and  $\leq$  6 GHz

 $\{[95.6 \text{ mW}] + [(200 \text{ mm} - 50 \text{ mm}) * 10]\} \text{ mW}$ 

{1596} mW

Peak conducted power of DTS transmitter was measured to be 71.3 mW. Therefore, the EUT meets SAR Exclusion Threshold.

#### SAR Calculations: 902.8 – 927.7 MHz FHSS transmitter

Power allowed at numeric threshold for 50 mm in step a)

(max power of channel, including tune-up tolerance, mW)  $\leq [3.0 / \sqrt{f_{(GHz)}}] *$  [min. test separation distance, mm]

(max power of channel, including tune-up tolerance, mW)  $\leq$  [3.0 /  $\sqrt{(0.928 \text{ GHz})}$ ] \* [50 mm)

(max power of channel, including tune-up tolerance, mW)  $\leq$  155.7 mW

Therefore SAR Exclusion for 200 mm test distance is

{[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance  $-50 \text{ mm}) \cdot (f_{(MHz)}/150)$ ]} mW, for 100 MHz to 1500 MHz

{[155.7 mW] + [(200 mm - 50 mm) \* (902.8 MHz/150)]} mW

{1058} mW

Peak conducted power of FHSS transmitter was measured to be 9.29 mW. Therefore, the EUT meets SAR Exclusion Threshold.

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### **Radiofrequency Radiation Exposure Evaluation: Mobile Devices**

Portable devices shall be evaluated for RF radiation exposure according to the provisions of FCC §2.1091 and the MPE guidelines identified in FCC §1.1310.

The limits, as defined FCC 1.1310 Table 1 (B) limits for general public exposure was applied. The limits for the frequency ranges 300 MHz to 1.5 GHz and 1.5 GHz to 100 GHz was applied. The limits are  $f/1500 \text{ mW/cm}^2$  and 1.0 mW/cm<sup>2</sup> respectively

The power density formula is given by:  $P_d = PG / (4*pi*R^2)$ 

Where, P = Peak Antenna Conducted Power in mW G = Numeric Antenna Gain Pi = 3.1416 R = Separation distance in cm

#### MPE Calculations: 2412 – 2462 MHz DTS transmitter

The DTS transmitter have a 2 dBi antenna and the maximum peak power is 71.3 mW.

$$\begin{split} P_d &= (71.3 \text{ mW} * 1.6) \ / \ (4 * 3.1416 * (20 \text{cm})^2) \\ P_d &= 0.022 \ \text{mW} \ / \ \text{cm}^2 \end{split}$$

The device passes the requirement. The calculated power density is  $0.022 \text{ mW/cm}^2$  and this is below the  $1.0 \text{ mW/cm}^2$  limit.

#### MPE Calculations: 902.8 – 927.7 MHz FHSS transmitter

The FHSS transmitter have a 1.5 dBi antenna and the maximum peak power is 9.29 mW.

$$\begin{split} P_d &= (9.3 \text{ mW} * 1.4) \, / \, (4 * 3.1416 * (20 \text{cm})^2) \\ P_d &= 0.0026 \text{ mW} / \, \text{cm}^2 \end{split}$$

The device passes the requirement. The calculated power density is  $0.0026 \text{ mW/cm}^2$  and this is below the (902.8/1500) =  $0.6 \text{ mW/cm}^2$  limit.

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