



## **Maximum Permissible Exposure Evaluation**

**For the  
Orbcomm Inc.  
OG2 MODULE  
FCC ID: XGS-ORBCOG2BAM1**

**April 15, 2014  
WLL Report: 13348-MPE Rev 0**

**Prepared for:  
ORBCOMM INC.  
22265 PACIFIC BLVD – STE. 200  
STERLING, VA, 20166-6801**

**Prepared by:  
WASHINGTON LABORATORIES, LTD.  
7560 LINDBERGH DRIVE  
GAITHERSBURG, MARYLAND 20879**



**Testing Certificate AT-1448**

## Maximum Permissible Exposure Evaluation

For the  
**Orbcomm Inc.**

**OG2 MODULE**  
**FCC ID: XGS-ORBCOG2BAM1**

**April 15, 2014**

WLL Report #13348-MPE

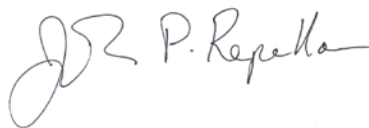
Prepared by:

A handwritten signature in blue ink, appearing to read 'James Ritter', is enclosed in a rectangular box.

---

James Ritter  
Compliance Engineer

Reviewed by:

A handwritten signature in black ink, appearing to read 'John P. Repella', is shown below the 'Reviewed by:' text.

---

John P. Repella  
EMC & Wireless Lab Manager

## Abstract

This report has been prepared on behalf of Orbcomm Inc. OG2 Module to document the findings of the maximum permissible exposure evaluation on the Orbcomm Inc. OG2 Module. The purpose of this evaluation is to establish a minimum safe distance as per the RF exposure requirements as defined in FCC §1.1307 & §1.1310.

This report documents the results of testing to the requirements of:

- CFR Title 47 Volume 1 Practice and Procedure; (1.1307) Environmental Assessments

The Evaluation was performed by Washington Laboratories, Ltd, 7560 Lindbergh Drive, Gaithersburg, MD 20879. Washington Laboratories, Ltd. has been accepted as an EMC Conformity Assessment Body (CAB) under the United States/European Union Memorandum of Agreement. Washington Laboratories, Ltd. is accredited by ACLASS under Testing Certificate AT-1448.

Revision History	Reason	Date
Rev 0	Initial Release	April 15, 2014

## Table of Contents

<b>Abstract .....</b>	<b>ii</b>
<b>1 Introduction .....</b>	<b>1</b>
<b>2 Requirements .....</b>	<b>1</b>
2.1 Transmitter Categories .....	1
2.2 Exposure Categories .....	2
<b>3 Device Summary.....</b>	<b>3</b>
<b>4 Radio Frequency Radiation Exposure Evaluation .....</b>	<b>3</b>
4.1 Exposure Reductions.....	3
4.2 Exposure Calculations.....	4
4.3 Results.....	4

## List of Tables

Table 1: MPE Limits .....	2
Table 2: Device Summary of the OG2 Module.....	3
Table 3: Transmitter MPE Calculation Summary .....	4

## 1 Introduction

This report has been prepared on behalf of Orbcomm Inc. OG2 Module Transmitter to show compliance with the RF exposure requirements as defined in FCC §1.1307.

Testing supporting this evaluation was performed at Washington Laboratories, Ltd, 7560 Lindbergh Drive, Gaithersburg, MD 20879. Washington Laboratories, Ltd. has been accepted as an EMC Conformity Assessment Body (CAB) under the United States/European Union Memorandum of Agreement. Washington Laboratories, Ltd. is accredited with ACLASS under Testing Certificate AT-1448.

## 2 Requirements

Three different categories of transmitters are defined by the FCC in OET Bulletin 65. These categories are fixed installation, mobile, and portable. Additionally, the FCC categorizes the use of the devices based on the user's awareness and the ability to exercise control over his or her exposure. The two categories are defined as Occupational/Controlled Exposure and General Population/Uncontrolled Exposure.

### 2.1 Transmitter Categories

#### 2.1.1 Fixed Installations

A fixed location means that the device, including its antenna, is physically secured at a permanent location and is not able to be easily moved to another location. Additionally, distance to humans from the antenna is maintained to at least 2 meters.

#### 2.1.2 Mobile Devices

A mobile device is defined as a transmitting device designed to be used in other than fixed locations and to be generally used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's radiating structures and the body of the user or nearby persons. Transmitters designed to be used by consumers or workers that can be easily re-located, such as a wireless modem operating in a laptop computer, are considered mobile devices if they meet the 20 centimeter separation requirement. The FCC rules for evaluating mobile devices for RF compliance are found in 47 CFR §2.1091.

#### 2.1.3 Portable Devices

A portable device is defined as a transmitting device designed to be used so that the radiating structure(s) of the device is/are within 20 centimeters of the body of the user. Portable device requirements are found in Section 2.1093 of the FCC's Rules (47 CFR §2.1093).

## 2.2 Exposure Categories

The limits for exposure are determined by the type of situation the individual is exposed to. Table 1 lists the limits for the particular environment.

### 2.2.1 Occupational/Controlled Exposure

In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means. Awareness of the potential for RF exposure in a workplace or similar environment can be provided through specific training as part of a RF safety program. If appropriate, warning signs and labels can also be used to establish such awareness by providing prominent information on the risk of potential exposure and instructions on methods to minimize such exposure risks.

### 2.2.2 General Population/Uncontrolled Exposure

The general population / uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity. Warning labels placed on low-power consumer devices such as cellular telephones are not considered sufficient to allow the device to be considered under the occupational/controlled category and the general population/uncontrolled exposure limits apply to these devices.

**Table 1: MPE Limits**

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	6
300–1500	N/A	N/A	f/300	6
1500–100,000	N/A	N/A	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
30–300	27.5	0.073	0.2	30
300–1500	N/A	N/A	f/1500	30
1500–100,000	N/A	N/A	1	30

### 3 Device Summary

Table 1 below summarizes the criteria used to evaluate the OG2 Module.

**Table 2: Device Summary of the OG2 Module**

<b>Model Evaluated:</b>	OG2 Modem
<b>Transmitter Category:</b>	Mobile
<b>Exposure Category:</b>	General Population/Uncontrolled Exposure
<b>Antenna Gain:</b>	2.4dBi
<b>Power Output (dBm):</b>	38.34dBm
<b>Evaluation Distance:</b>	20cm
<b>Frequency Range:</b>	148.25-150.25 MHz
<b>Limit:</b>	0.200 mW/cm <sup>2</sup>
<b>Minimum Safe Distance</b>	6.8cm

### 4 Radio Frequency Radiation Exposure Evaluation

The highest RF output power of the unit was measured and recorded. According to §1.1310 of the FCC rules, the power density limit for General Population/Uncontrolled Exposure is 0.2 mW/cm<sup>2</sup>.

#### 4.1 Exposure Reductions

According to §1.1310 of the FCC rules “Exposure levels higher than the limits are permitted for shorter exposure times, as long as the average exposure over the specified averaging time in Table 1 is less than the limits”. For General Population/Uncontrolled Exposure the averaging time is 30 minutes.

This unit transmits 38.3dBm (at antenna output connector). This device is limited by regulatory limitation to 9 seconds of transmissions in any 900 seconds (15 minutes). Even though the actual transmit rate is lower this worst case scenario shall be used. Thus the unit can transmit a most 18 seconds in any 30 minute (1800seconds) interval. The averaging power reduction would equal:

$$10\text{Log} * (18\text{s}/1800\text{s}) = 10\text{Log} * 0.01 = -20\text{dB power reduction}$$

Using this reduction the MPE source based time averaged power output would be 18.3dBm (38.3dBm continuous power minus 20dB duty cycle reduction). 18.3 dBm will be used in the following exposure table for output power.

## 4.2 Exposure Calculations

The MPE shall be calculated at 20cm to show compliance with the power density limit. The following formula was used to calculate the Power Density:

$$S = \frac{PG}{4\pi R^2}$$

Where:

S = Power Density

P = Output Power at the Antenna Terminals

G = Gain of Transmit Antenna (linear gain-isotropic)

R = Distance from Transmitting Antenna

**Table 3: Transmitter MPE Calculation Summary**

One Transmitter		
Frequency	148.025	MHz
Limit	0.200	mW/cm <sup>2</sup>
Distance (cm), R =	20	cm
Power (dBm), P =	18.3	dBm
TX Ant Gain (dBi), G =	2.4	dB
<b>Power Density:</b>	0.02	mW/cm <sup>2</sup>
<b>Minimum Distance:</b>	6.8	cm

**Separation < 20 cm**

## 4.3 Results

Based on the calculations above in Table 3, the minimum safe distance for this device is 6.8cm.