



RF Exposure Evaluation Report

APPLICANT : NetComm Limited
EQUIPMENT : HSPA+ WiFi Router
BRAND NAME : NetComm
MODEL NAME : 3G39W-V & 3G39W-I
MARKETING NAME : HSPA+ Wi-Fi Router
FCC ID : XIA-3G39W
FILING TYPE : Certification
STANDARD : OET Bulletin 65 Supplement C (Edition 01-01)

We, SPORTON INTERNATIONAL INC., would like to declare that the device has been evaluated in accordance with FCC OET Bulletin 65 Supplement C (Edition 01-01), and pass the limit. Without written approval of SPORTON INTERNATIONAL INC., the test report shall not be reproduced except in full.

Reviewed by:

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1. RF Exposure Introduction

Requirements

Three different categories of transmitters are defined by the FCC in OET Bulletin 65. These categories are fixed installation, mobile and portable and are defined as follows:

▪ Fixed installation:

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.

▪ 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 transmitters' 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 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.

▪ 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)



The FCC also categorizes the use of the device as based upon the user's awareness and ability to exercise control over his or her exposure. The two categories defined are Occupational/Controlled Exposure and General Population/Uncontrolled Exposure. These two categories are defined as follows:

▪ **Occupational/controlled Exposure:**

In general, occupational/controlled exposure limits are applicable to situation in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure. 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.

▪ **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.



2. Administration Data

2.1 Testing Laboratory

Test Site	SPORTON INTERNATIONAL INC.
Test Site Location	No. 52, Hwa Ya 1 st Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C. TEL: +886-3-327-3456 FAX: +886-3-328-4978

2.2 Applicant

Company Name	NetComm Limited
Address	Level 2, 18-20 Orion Road Lane Cove, NSW Australia

2.3 Manufacturer

Company Name	NetComm Limited
Address	Level 2, 18-20 Orion Road Lane Cove, NSW Australia

3. General Information

3.1 Description of Device Under Test (DUT)

Product Feature & Specification	
DUT Type	HSPA+ WiFi Router
Brand Name	NetComm
Model Name	3G39W-V & 3G39W-I
Marketing Name	HSPA+ Wi-Fi Router
FCC ID	XIA-3G39W
Tx Frequency	2400 MHz ~ 2483.5 MHz <contain WWAN module> GSM850 : 824 MHz ~ 849 MHz GSM1900 : 1850 MHz ~ 1910 MHz WCDMA Band V : 824 MHz ~ 849 MHz WCDMA Band IV : 1710 MHz ~ 1755 MHz WCDMA Band II : 1850 MHz ~ 1910 MHz
Rx Frequency	2400 MHz ~ 2483.5 MHz <contain WWAN module> GSM850 : 869 MHz ~ 894 MHz GSM1900 : 1930 MHz ~ 1990 MHz WCDMA Band V : 869 MHz ~ 894 MHz WCDMA Band IV : 2110 MHz ~ 2155 MHz WCDMA Band II : 1930 MHz ~ 1990 MHz
Antenna Type	Main : Fixed External Antenna Aux: Fixed Internal Antenna
HW Version	V1.32
SW Version	3G39W-I: 1.1.70.0/3G39W-V: 1.1.86.0
Type of Modulation	802.11b : DSSS 802.11g : OFDM <contain WWAN module> GSM: GMSK GPRS: GMSK EDGE: GMSK / 8PSK WCDMA: QPSK (Uplink) HSDPA: QPSK (Uplink) HSUPA: QPSK (Uplink)
DUT Stage	Identical Prototype

Remark: The above DUT's information was declared by manufacturer. Please refer to the specifications or user's manual for more detailed description.



4. RF Exposure Evaluation

4.1 Radio Frequency Radiation Exposure Evaluation

According to 1.1310 of the FCC rules, the power density limit for General Population/Uncontrolled Exposure is f/1500 mW/cm² for 300 MHz to 1500 MHz and 1.0 mW/cm² for 1500 MHz to 100000 MHz. As this is a mobile application the MPE shall be calculated at 20 cm to show compliance with the power density limit. The following formula was used to calculate the Power Density:

S = PG / (4πR²)

Where:

S = Power Density

P = Output Power at Antenna Terminals

G = Gain of Transmit Antenna (linear gain)

R = Distance from Transmitting Antenna

This device is evaluated by mobile device with general population/uncontrolled exposure condition.

For this device, the calculation is as follows:

Wireless LAN operated in IEEE 802.11b mode (Tx/Rx: 2400~2483.5MHz) Chain 0:

Table with 9 columns: Channel Number, Frequency (MHz), Antenna Gain (dBi), Antenna Gain (numeric), Source-based time-average power (dBm), Source-based time-average power (mW), Average EIRP (mW), Calculated RF Exposure (W/m²), Limit (W/m²). Rows for channels 1, 6, and 11.

Wireless LAN operated in IEEE 802.11b mode (Tx/Rx: 2400~2483.5MHz) Chain 1:

Table with 9 columns: Channel Number, Frequency (MHz), Antenna Gain (dBi), Antenna Gain (numeric), Source-based time-average power (dBm), Source-based time-average power (mW), Average EIRP (mW), Calculated RF Exposure (W/m²), Limit (W/m²). Rows for channels 1, 6, and 11.



Wireless LAN operated in IEEE 802.11g mode (Tx/Rx: 2400~2483.5MHz) Chain 0:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
1	2412	2.00	1.58	12.16	16.44	26.06	0.01	1.00
6	2437	2.00	1.58	12.14	16.37	25.94	0.01	1.00
11	2462	2.00	1.58	11.51	14.16	22.44	0.00	1.00

Wireless LAN operated in IEEE 802.11g mode (Tx/Rx: 2400~2483.5MHz) Chain 1:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
1	2412	2.00	1.58	11.53	14.22	22.54	0.00	1.00
6	2437	2.00	1.58	11.81	15.17	24.04	0.00	1.00
11	2462	2.00	1.58	12.13	16.33	25.88	0.01	1.00

Wireless LAN operated in IEEE 802.11n (BW 20MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 0:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
1	2412	2.00	1.58	11.47	14.03	22.23	0.00	1.00
6	2437	2.00	1.58	11.69	14.76	23.39	0.00	1.00
11	2462	2.00	1.58	11.50	14.13	22.39	0.00	1.00

Wireless LAN operated in IEEE 802.11n (BW 20MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 1:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
1	2412	2.00	1.58	11.47	14.03	22.23	0.00	1.00
6	2437	2.00	1.58	11.69	14.76	23.39	0.00	1.00
11	2462	2.00	1.58	11.50	14.13	22.39	0.00	1.00



Wireless LAN operated in IEEE 802.11n (BW 20MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 0+1:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
1	2412	2.00	1.58	12.25	16.79	26.61	0.01	1.00
6	2437	2.00	1.58	12.05	16.03	25.41	0.01	1.00
11	2462	2.00	1.58	11.87	15.38	24.38	0.00	1.00

Wireless LAN operated in IEEE 802.11n (BW 40MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 0:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
3	2422	2.00	1.58	11.81	15.17	24.04	0.00	1.00
6	2437	2.00	1.58	12.08	16.14	25.59	0.01	1.00
9	2452	2.00	1.58	12.14	16.37	25.94	0.01	1.00

Wireless LAN operated in IEEE 802.11n (BW 40MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 1:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
3	2422	2.00	1.58	11.96	15.70	24.89	0.00	1.00
6	2437	2.00	1.58	11.94	15.63	24.77	0.00	1.00
9	2452	2.00	1.58	12.06	16.07	25.47	0.01	1.00

Wireless LAN operated in IEEE 802.11n (BW 40MHz) mode (Tx/Rx: 2400~2483.5MHz) Chain 0+1:

Channel Number	Frequency (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (W/m ²)	Limit (W/m ²)
3	2422	2.00	1.58	12.34	17.14	27.16	0.01	1.00
6	2437	2.00	1.58	12.36	17.22	27.29	0.01	1.00
9	2452	2.00	1.58	12.17	16.48	26.12	0.01	1.00



Function	Antenna Gain (dBi)	Antenna Gain (numeric)	Maximum Output Power (dBm)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (mW/cm ²)	Limit (mW/cm ²)
GSM Cellular Band (1 time slot)	1	1.26	32.95	23.95	248.31	312.61	0.06	0.55
GSM PCS Band (1 time slot)	1	1.26	29.6	20.6	114.82	144.54	0.03	1.00

WCDMA

Function	Antenna Gain (dBi)	Antenna Gain (numeric)	Source-based time-average power (dBm)	Source-based time-average power (mW)	Average EIRP (mW)	Calculated RF Exposure (mW/cm ²)	Limit (mW/cm ²)
WCDMA Cellular Band	1	1.26	23.78	238.78	300.61	0.06	0.55
WCDMA PCS Band	1	1.26	23.93	247.17	311.17	0.06	1.00
WCDMA AWS Band	1	1.26	24.1	257.04	323.59	0.06	1.00

For WWAN and WLAN Transmit Simultaneously:

WWAN Max. Power Density (GPRS Cellular)	WLAN Max. Power Density (802.11n (BW 20MHz))	Totally RF Exposure (mW/cm ²)	Limit (mW/cm ²)
0.06	0.01	0.07	0.55

NOTE: The Maximum Output Power Refer QISEM820U MPE Report FCC ID: QISEM820U

This device can pass RF exposure limit.