



Radio Frequency Exposure Evaluation Report

for

Manufacturer: Verizon Telematics Inc.
Model number: AT-255

Product Description: GPS Navigation Device with 3G and Bluetooth

FCC ID: ZOQAT-255
IC Certification Number: 9734A-AT255

Applied Rules and Standards

CFR Part Part 1 (1.1307 &1.1310), Part 2 (2.1091),
FCC KDB 447498 D01 General 24 RF Exposure Guidance v05r02

Industry Canada RSS-102, Issue 4 of March 2010

Report number: EMC_VERIT-005-14001_AT_255_MPE

DATE: 2014-11-22

1 Administrative Data

1.1 Identification of the Testing Laboratory Issuing the Test Report

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1.2 Identification of the Client / Manufacturer

Applicant's Name:	Verizon Telematics Inc.
Street Address:	2002 Summit Blvd., Suite 1800
City/Zip Code	Atlanta, GA 30319
Country	USA
Contact Person:	Bryant Elliott
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2 Equipment under Assessment

Marketing Name:	in-Drive Communicator AT-255
Model Number:	AT-255
FCC ID:	ZOQAT-255
IC Certification Number:	9734A-AT255
Product Description:	GPS Navigation Device with 3G and Bluetooth
Transmitter information:	<ol style="list-style-type: none">1. Sierra Wireless SL8080; FCC ID: N7NSL8080; IC ID: 2417C-SL8080<ul style="list-style-type: none">• 850/900/1800/1900MHz GSM/GPRS/EDGE; GPRS multislot class 10; EDGE multislot class 12• 850/900/1900/2100 MHz WCDMA;2. Bluetooth EDR / 4.0 radio, Peak 3.98mW/6dBm;3. GPS 1575.42 MHz;
Antenna info (antenna as presented for testing with the development board):	cellular: internal; -1.6 dBi at 850MHz; +1 dBi at 1900MHz; BT: ceramic chip; 0.4dBi peak gain;
Co-located Transmitters/ Antennas?	<input checked="" type="checkbox"/> Yes (Bluetooth and Cellular) <input type="checkbox"/> No
Device Category:	<input checked="" type="checkbox"/> Fixed Installation <input type="checkbox"/> Mobile <input type="checkbox"/> Portable <input type="checkbox"/> mixed Mobile and Portable
Exposure Category:	<input type="checkbox"/> Occupational/ Controlled <input checked="" type="checkbox"/> General Population/ Uncontrolled
Rated Operating Voltage Range:	+6 to +24Vdc
Rated Operating Temperature Range:	-40°C ~ +85°C
Test Sample Status:	Prototype

3 Assessment

This RF Exposure evaluation report provides information about compliance of the below identified device with the RF Exposure limits for mobile or fixed devices as defined in FCC CFR Part 1 (1.1307 &1.1310), Part 2 (2.1091) and IC standard RSS-102 under given conditions (measured or rated RF output power, antenna gain, distance towards human body, multiple transmitter information as presented by the applicant).

In addition, maximum antenna gain or minimum distance towards the human body is calculated, respectively, where relevant.

The device meets the limits as stipulated by the above given FCC and IC rule parts based on available specifications.

Company	Description	Model #
Verizon Telematics, Inc.	GPS Navigation Device with 3G and Bluetooth	AT-255

Report reviewed by:

2014-11-22	Compliance	Franz Engert (EMC Compliance Manager)
Date	Section	Name

Responsible for the Report:

2014-11-22	Compliance	James Donnellan (Sr. EMC Engineer)
Date	Section	Name

4 RF Exposure Limits and FCC and IC Basic Rules

For the specific described radio apparatus the following basic limits and rules apply for both, FCC and IC where not indicated differently.

4.1 Maximum Permissible Exposure (MPE) Limits acc. to FCC 1.1310(e) / RSS-102, cl. 4.2:

Frequency Range (MHz)	Power density (mW/cm ²)	Averaging time (minutes)
300 – 1500	f (MHz) /1500	30 (IC:6)
1500 – 100.000 (IC:1500 – 150000)	1.0	30 (IC:6)

4.2 Routine Environmental Evaluation Categorical Exclusion Limits acc. to FCC 2.109(c) / RSS-102, cl. 2.5 (rounded to 1 decimal point):

Operating frequency < 1.5GHz: excluded if ERP < 1.5W / 31.8dBm (IC: 2.5W / 34.0dBm EIRP);
Operating frequency > 1.5GHz: excluded if ERP < 3.0W / 34.8dBm (IC: 5.0W / 37.0dBm EIRP);

4.3 EMC Output Power Limits (ERP/EIRP) acc. to FCC part 22/24/27 / IC RSS-132, RSS-133, RSS-139 (to be additionally taken into account for maximum antenna gain considerations)

part 22: 7W ERP / 38.5dBm (IC: 11.5W / 40.6dBm EIRP)

part 24: 2W EIRP / 33.0dBm

part 27: 1W EIRP / 30.0dBm

Per KDB 447498 D01 FCC allows calculative estimation of RF exposure for mobile applications when routine environmental evaluation categorical exclusion applies and also for fixed applications.

When categorical exclusion can not be claimed for mobile applications MPE measurement is required for TCB approval.

RSS-102 of Industry Canada does generally not require RF exposure evaluation for fixed or mobile applications which stay below the given exclusion limits.

4.4 RF Exposure Estimation (MPE Estimation)

Having available the source based average output power and peak antenna gain or the ERP/EIRP of the specified device and for a known minimum distance of it's radiating structures from the body of persons according to it's use cases (at least 20cm) the power density at that distance can be estimated by the following formula for plane-wave equivalent conditions (far-field conditions), when ground reflection is neglected.

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

where: S = power density (mW/cm² or W/m²)

P = power input to the antenna (mW or W)

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 (cm or m)

5 Evaluations

The following calculations are – for the portion of the cellular transmitter - based on the specified maximum conducted average output power of the cellular module incorporated in the EUT and thus – considering the specified peak antenna gain of the integral antennae - resulting in the theoretical worst case maximum average ERP/EIRP, because all measured conducted average values are lower.

5.1 Routine Environmental Evaluation Applicability

Based on the theoretical maximum average ERP/EIRP, see above.

Pmax is the target conducted output power plus the upper tolerance as specified for the integrated cellular module. For the Bluetooth transmitter the maximum conducted output power value is taken from the relevant FCC grant;

Only the known worst cases with highest resulting average EIRP are listed per band.

Transmission Mode	Pmax (Target Power + Upper Tolerance)	Peak Gain	Duty Cycle	EIRP, source based time averaged (EIRP _{max})	Total EIRP simultaneous transmissions intra-band (worst cases only)	FCC & IC Limit for Routine Environmental Evaluation Applicability, EIRP	Excluded?
	dBm	dBi	%	dBm	dBm	dBm	
GPRS 850 1TS	33+2	-1.6	12.5	24.4	n.a.	33.9	yes
GPRS 850 2TS	33+2	-1.6	25	27.4	n.a.	33.9	yes
WCDMA Bd V	24+1	-1.6	100	23.4	n.a.	33.9	yes
GPRS 1900 1TS	30+2	+1.0	12.5	24.0	n.a.	36.9	yes
GPRS 1900 2TS	30+2	+1.0	25	27.0	n.a.	36.9	yes
WCDMA Bd II	24+1	+1.0	100	26.0	n.a.	36.9	yes
Bluetooth LE	5.6	0.4	50%	3.0	n.a.	36.9	yes

Result: The transmitters in the equipment are categorically excluded from Routine Environmental Evaluation. There are no intra-band co-transmissions possible in the device.

5.2 Compliance with MPE (Power Density) limits

Limits:

Smax @ 824MHz = 0.55mW/cm² (824MHz is worst case as lowest operating frequency in the cellular band);

Smax @ 1900MHz and @ 2400MHz = 1.0mW/cm²:

The highest source base time averaged EIRPmax per band calculated with the rated peak antenna gain values are taken from the table in section 5.1 above;

The highest power density is resulting from the formula: $S = \text{EIRPmax} / 4\pi r^2$;

The power density is calculated for the minimum distance $r = 20\text{cm}$;

Highest source base time averaged EIRP with GPRS 850 MHz, 2TS: 27.4dBm;
Resulting maximum power density at 850MHz: **S(850MHz) = 0.11mW/cm²**

Highest source base time averaged EIRP with GPRS 1900 MHz, 2TS: 27dBm;
Resulting maximum power density at 1900MHz: **S(1900MHz) = 0.11mW/cm²**

Result: The equipment fulfills the MPE limits for the minimum distance between the antenna and the human body of 20cm.

5.3 Simultaneous Transmission MPE Test Exclusion (per KDB 447498 D01)

Possible simultaneous transmissions: Cellular Radio and Bluetooth.

Consideration of simultaneous transmission with the Bluetooth radio is considered obsolete due to the low average power of only about 2 mW.

Result: The equipment is excluded from simultaneous transmission MPE test.

6 Revision History

Date	Report Name	Changes	Prepared by
2014-11-11	EMC_VERIT-005-14001_AT_255_MPE	Initial Release	James Donnellan