

Exhibit D

Analysis of Non-Ionizing Radiation for Ka-band Earth Station Antenna Systems

This report analyzes the non-ionizing radiation levels for a 1.8 m earth station antenna system and a 2.4 m earth station antenna system.

The FCC's Office of Engineering Technology's Bulletin No. 65 specifies that there are two separate tiers of exposure limits that are dependant upon the situation in which the exposure takes place and/or the status of the individuals who are subject to the exposure. The two tiers are General Population / Uncontrolled environment, and an Occupational / Controlled environment.

The applicable exposure limit for the General Population / Uncontrolled environment, i.e., areas that people may enter freely, at this frequency of operation is 1 mW/cm² average power density over a 30 minute period.

The applicable exposure limit for the Occupational / Controlled environment, i.e., areas that only authorized / trained personnel have access to, at this frequency of operation is 5 mW/cm² average power density over a 6 minute period.

Summary of expected radiation levels for a 1.8 m Ka-band antenna in an Uncontrolled environment when operating at 30 GHz with a 100 W PA

<u>Region</u>	<u>Maximum Power Density</u>	<u>Hazard Assessment</u>
Far field (R_{ff}) = 228.308 m	0.819 mW/cm ²	Satisfies FCC MPE
Near field (R_{nf}) = 95.128 m	2.243 mW/cm ²	Potential Hazard
Transition region (R_t) (R_t) = $R_{nf} < R_t < R_{ff}$	2.233 mW/cm ²	Potential Hazard
Main Reflector Surface ($S_{surface}$)	4.706 mW/cm ²	Potential Hazard

Note, power density level in the area between the feed and the reflector surface is greater than the reflector surface and is assumed to be a potential hazard.

Summary of expected radiation levels for a 1.8 m Ka-band Antenna in a Controlled environment when operating at 30 GHz and 100 W of input power

<u>Region</u>	<u>Maximum Power Density</u>	<u>Hazard Assessment</u>
Far field (R_{ff}) = 228.308 m	0.819 mW/cm ²	Satisfies FCC MPE
Near field (R_{nf}) = 95.128 m	2.243 mW/cm ²	Satisfies FCC MPE
Transition region (R_t) (R_t) = $R_{nf} < R_t < R_{ff}$	2.233 mW/cm ²	Satisfies FCC MPE
Main Reflector Surface ($S_{surface}$)	4.706 mW/cm ²	Satisfies FCC MPE

Note, power density level in the area between the feed and the reflector surface is greater than the reflector surface and is assumed to be a potential hazard.

Conclusions

The proposed earth station system will be located in an environment with controlled access and will be serviced by trained personnel. Only trained personnel will operate the transmitting system during testing. No access to the reflector/feed area will be permitted when the transmitter is turned on. Based on the above analysis it is concluded that no hazard exists for the public when the system is being operated.

Analysis of 1.8 m antenna for operation at 30 GHz

The analysis and calculations that follow in this report are performed in compliance with the methods described in the OET Bulletin No. 65.

Definition of terms

The terms are used in the formulas here are defined as follows:

S_{surface}	= maximum power density at the antenna surface
S_{nf}	= maximum near-field power density
S_{t}	= power density in the transition region
S_{ff}	= power density (on axis)
R_{nf}	= extent of near-field
R_{ff}	= distance to the beginning of the far-field
R	= distance to point of interest
P_{a}	= 100 W maximum power amplifier output
L_{fs}	= 0.7 dB loss between power amplifier and antenna feed
OBO	= 4.19 dB operating PA output back off
P	= 32.4 W power fed to the antenna in Watts
A	= 2.757 m ² physical area of the aperture antenna
G	= 1.654 * 10 ⁵ power gain relative to an isotropic radiator
D	= 1.873 diameter of antenna in meters
F	= 30000 frequency in MHz
λ	= 0.01 m wavelength in meters (300/F _{MHz})
η	= 0.477 aperture efficiency

Antenna Surface. The maximum power density directly in front of an antenna (e.g., at the antenna surface) can be approximated by the following equation:

$$\begin{aligned} S_{\text{surface}} &= (4 * P) / A && (1.1) \\ &= (4 * 32.4 \text{ W}) / 2.757 \text{ m}^2 \\ &= 4.706 \text{ mW/cm}^2 \end{aligned}$$

Near Field Region. In the near-field or Fresnel region, of the main beam, the power density can reach a maximum before it begins to decrease with distance. The extent of the near field can be described by the following equation (**D** and λ in same units):

$$\begin{aligned} R_{\text{nf}} &= D^2 / (4 * \lambda) && (1.2) \\ &= (1.873 \text{ m})^2 / (4 * 0.01 \text{ m}) \\ &= 95.128 \text{ m} \end{aligned}$$

The magnitude of the on-axis (main beam) power density varies according to location in the near field. However, the maximum value of the near-field, on-axis, power density can be expressed by the following equation:

$$\begin{aligned}
 S_{nf} &= (16 * \eta * P) / (\pi * D^2) & (1.3) \\
 &= (16 * 0.477 * 32.4 \text{ W}) / (\pi * (1.873 \text{ m})^2) \\
 &= 2.243 \text{ mW/cm}^2
 \end{aligned}$$

Transition Region. Power density in the transition region decreases inversely with distance from the antenna, while power density in the far field (Fraunhofer region) of the antenna decreases inversely with the *square* of the distance. The transition region will then be the region extending from R_{nf} to R_{ff} . If the location of interest falls within this transition region, the on-axis power density can be determined from the following equation:

$$\begin{aligned}
 S_t &= (S_{nf} * R_{nf}) / R & (1.4) \\
 &= (2.243 \text{ mW/cm}^2 * 95.128 \text{ m}) / R \\
 &= (213.412 \text{ m} * \text{mW/cm}^2) / R \text{ where } R \text{ is the location of interest in meters}
 \end{aligned}$$

Far-Field Region. The power density in the far-field or Fraunhofer region of the antenna pattern decreases inversely as the square of the distance. The distance to the start of the far field can be calculated by the following equation:

$$\begin{aligned}
 R_{ff} &= (0.6 * D^2) / \lambda & (1.5) \\
 &= (0.6 * (1.873 \text{ m})^2) / 0.01 \text{ m} \\
 &= 228.308 \text{ m}
 \end{aligned}$$

The power density at the start of the far-field region of the radiation pattern can be estimated by the equation:

$$\begin{aligned}
 S_{ff} &= (P * G) / (4 * \pi * R_{ff}^2) & (1.6) \\
 &= (32.4 \text{ W} * 1.654 * 10^5) / (4 * \pi * (228.308 \text{ m})^2) \\
 &= 0.819 \text{ mW/cm}^2
 \end{aligned}$$

Summary of expected radiation levels for a 2.4 m Ka-band antenna in an Uncontrolled environment when operating at 30 GHz with a 100 W PA

<u>Region</u>	<u>Maximum Power Density</u>	<u>Hazard Assessment</u>
Far field (R_{ff}) = 405.881 m	0.259 mW/cm ²	Satisfies FCC MPE
Near field (R_{nf}) = 169.117 m	0.710 mW/cm ²	Potential Hazard
Transition region (R_t) (R_t) = $R_{nf} < R_t < R_{ff}$	0.710 mW/cm ²	Potential Hazard
Main Reflector Surface ($S_{surface}$)	2.647 mW/cm ²	Potential Hazard

Note, power density level in the area between the feed and the reflector surface is greater than the reflector surface and is assumed to be a potential hazard.

Summary of expected radiation levels for a 2.4 m Ka-band Antenna in a Controlled environment when operating at 30 GHz and 100 W of input power

<u>Region</u>	<u>Maximum Power Density</u>	<u>Hazard Assessment</u>
Far field (R_{ff}) = 405.881 m	0.259 mW/cm ²	Satisfies FCC MPE
Near field (R_{nf}) = 169.117 m	0.710 mW/cm ²	Satisfies FCC MPE
Transition region (R_t) (R_t) = $R_{nf} < R_t < R_{ff}$	0.710 mW/cm ²	Satisfies FCC MPE
Main Reflector Surface ($S_{surface}$)	2.647 mW/cm ²	Satisfies FCC MPE

Note, power density level in the area between the feed and the reflector surface is greater than the reflector surface and is assumed to be a potential hazard.

Conclusions

The proposed earth station system will be located in an environment with controlled access and will be serviced by trained personnel. Only trained personnel will operate the transmitting system during testing. No access to the reflector/feed area will be permitted when the transmitter is turned on. Based on the above analysis it is concluded that no hazard exists for the public when the system is being operated.

Analysis of 2.4 m antenna for operation at 30 GHz

The analysis and calculations that follow in this report are performed in compliance with the methods described in the OET Bulletin No. 65.

Definition of terms

The terms are used in the formulas here are defined as follows:

S_{surface}	= maximum power density at the antenna surface
S_{nf}	= maximum near-field power density
S_{t}	= power density in the transition region
S_{ff}	= power density (on axis)
R_{nf}	= extent of near-field
R_{ff}	= distance to the beginning of the far-field
R	= distance to point of interest
P_{a}	= 100 W maximum power amplifier output
L_{fs}	= 0.7 dB loss between power amplifier and antenna feed
OBO	= 4.19 dB operating PA output back off
P	= 32.4 W power fed to the antenna in Watts
A	= 4.901 m ² physical area of the aperture antenna
G	= 1.654 * 10 ⁵ power gain relative to an isotropic radiator
D	= 2.498 diameter of antenna in meters
F	= 30000 frequency in MHz
λ	= 0.01 m wavelength in meters (300/F _{MHz})
η	= 0.268 aperture efficiency

Antenna Surface. The maximum power density directly in front of an antenna (e.g., at the antenna surface) can be approximated by the following equation:

$$\begin{aligned} S_{\text{surface}} &= (4 * P) / A && (1.1) \\ &= (4 * 32.4 \text{ W}) / 4.901 \text{ m}^2 \\ &= 2.647 \text{ mW/cm}^2 \end{aligned}$$

Near Field Region. In the near-field or Fresnel region, of the main beam, the power density can reach a maximum before it begins to decrease with distance. The extent of the near field can be described by the following equation (**D** and λ in same units):

$$\begin{aligned} R_{\text{nf}} &= D^2 / (4 * \lambda) && (1.2) \\ &= (2.498 \text{ m})^2 / (4 * 0.01 \text{ m}) \\ &= 169.117 \text{ m} \end{aligned}$$

The magnitude of the on-axis (main beam) power density varies according to location in the near field. However, the maximum value of the near-field, on-axis, power density can be expressed by the following equation:

$$\begin{aligned}
 S_{nf} &= (16 * \eta * P) / (\pi * D^2) & (1.3) \\
 &= (16 * 0.268 * 32.4 \text{ W}) / (\pi * (2.498 \text{ m})^2) \\
 &= 0.710 \text{ mW/cm}^2
 \end{aligned}$$

Transition Region. Power density in the transition region decreases inversely with distance from the antenna, while power density in the far field (Fraunhofer region) of the antenna decreases inversely with the *square* of the distance. The transition region will then be the region extending from R_{nf} to R_{ff} . If the location of interest falls within this transition region, the on-axis power density can be determined from the following equation:

$$\begin{aligned}
 S_t &= (S_{nf} * R_{nf}) / R & (1.4) \\
 &= (2.243 \text{ mW/cm}^2 * 169.117 \text{ m}) / R \\
 &= (120.069 \text{ m} * \text{mW/cm}^2) / R \text{ where } R \text{ is the location of interest in meters}
 \end{aligned}$$

Far-Field Region. The power density in the far-field or Fraunhofer region of the antenna pattern decreases inversely as the square of the distance. The distance to the start of the far field can be calculated by the following equation:

$$\begin{aligned}
 R_{ff} &= (0.6 * D^2) / \lambda & (1.5) \\
 &= (0.6 * (2.498 \text{ m})^2) / 0.01 \text{ m} \\
 &= 405.881 \text{ m}
 \end{aligned}$$

The power density at the start of the far-field region of the radiation pattern can be estimated by the equation:

$$\begin{aligned}
 S_{ff} &= (P * G) / (4 * \pi * R_{ff}^2) & (1.6) \\
 &= (32.4 \text{ W} * 1.654 * 10^5) / (4 * \pi * (405.881 \text{ m})^2) \\
 &= 0.259 \text{ mW/cm}^2
 \end{aligned}$$