

Maximum Permissible Exposure (MPE) Evaluation Report

Report No. : 140800079TWN-001

Model No. : LNL9ZA1CB

Issued Date : Aug. 25, 2014

Applicant: Leeo, Inc.
989 Commercial Street, Palo Alto, CA 94303 USA

Test Method/ Standard: FCC 1.1310

Test By: Intertek Testing Services Taiwan Ltd.
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Summary of Tests

MPE Evaluation meet FCC OET No. 65: 1997, IEEE C95.1-2005

Test	Reference	Results
MPE Evaluation	FCC Guidelines for Human Exposure IEEE C95.1	Complies

1. General information

1.1 Identification of the EUT

Product:	Nightlight
Model No:	LNL9ZA1CB
FCC ID:	2ACWP-LNL9ZA1C
Operating Frequency:	1. 2412 MHz ~ 2462 MHz for 802.11b, 802.11g, 802.11n (HT20) 2. 2402 MHz ~ 2480 MHz for BT 4.0, BT 2.0
Channel Number:	1. 11 channels for 2412 MHz ~ 2462 MHz(WiFi) 2. 39 channels for 2402 MHz ~ 2480 MHz(BT 4.0) 3. 79 channels for 2402 MHz ~ 2480 MHz(BT 2.0)
Access scheme:	WiFi: DSSS, OFDM ; BT4.0: GFSK BT 2.0: GFSK, $\pi/4$ -DQPSK, 8-DPSK
Rated Power:	100-240 Vac, 50-60 Hz, 0.2 A
Power Cord:	N/A
Sample Received:	Jul. 31, 2014
Sample condition:	Workable
Test Date(s):	Aug. 06, 2014
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Note 2:	When determining the test conclusion, the Measurement Uncertainty of test has been considered.



1.2 Antenna description

The antenna is affixed to the EUT using a unique connector, which allows for replacement of a broken antenna, but DOES NOT use a standard antenna jack or electrical connector.

Antenna Gain : -0.59 dBi max

Antenna Type : PIFA antenna

Connector Type : IPEX

1.3 Peripherals equipment

Peripherals	Brand	Model No.	Serial No.	Data cable
Notebook PC	HP	HSTNN-I04C	N/A	USB to RS232 × 1 meter



2. Test specifications

2.1 Introduction

The EUT operates in the 2.4 GHz ISM band. Due to the EUT (include antenna) at its normal operation distance is at least 20 cm from the human body, the EUT was defined as a Mobile Device.

The reason to do the MPE Evaluation is to avoid the RF hazard to human body. The maximum output power and gain of the antenna were used to calculate the limited Power density (S) at 20 cm distance away from the product. The limit for Maximum Permissible Exposure (MPE) specified in FCC 1.1310 and Safety Code 6 are followed.

According to 1.1307 (b)(1), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

2.2 RF Exposure Limit

According to FCC 1.1310: The criteria listed in the following table shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in 1.1307(b) and KDB 447498 D01 General RF Exposure Guidance v05r02.

SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and ≤ 50 mm

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table.

MHz	5	10	15	20	25	mm
150	39	77	116	155	194	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	
450	22	45	67	89	112	
835	16	33	49	66	82	
900	16	32	47	63	79	
1500	12	24	37	49	61	
1900	11	22	33	44	54	
2450	10	19	29	38	48	
3600	8	16	24	32	40	
5200	7	13	20	26	33	
5400	6	13	19	26	32	
5800	6	12	19	25	31	
MHz	30	35	40	45	50	mm
150	232	271	310	349	387	SAR Test Exclusion Threshold (mW)
300	164	192	219	246	274	
450	134	157	179	201	224	
835	98	115	131	148	164	
900	95	111	126	142	158	
1500	73	86	98	110	122	
1900	65	76	87	98	109	
2450	57	67	77	86	96	
3600	47	55	63	71	79	
5200	39	46	53	59	66	
5400	39	45	52	58	65	
5800	37	44	50	56	62	

Note: 10-g Extremity SAR Test Exclusion Power Thresholds are 2.5 times higher than the 1-g SAR Test Exclusion Thresholds indicated above. These thresholds do not apply, by extrapolation or other means, to occupational exposure limits.

SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and > 50 mm

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table.

MHz	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	mW
150	387	397	407	417	427	437	447	457	467	477	487	497	507	517	527	
300	274	294	314	334	354	374	394	414	434	454	474	494	514	534	554	
450	224	254	284	314	344	374	404	434	464	494	524	554	584	614	644	
835	164	220	275	331	387	442	498	554	609	665	721	776	832	888	943	
900	158	218	278	338	398	458	518	578	638	698	758	818	878	938	998	
1500	122	222	322	422	522	622	722	822	922	1022	1122	1222	1322	1422	1522	
1900	109	209	309	409	509	609	709	809	909	1009	1109	1209	1309	1409	1509	
2450	96	196	296	396	496	596	696	796	896	996	1096	1196	1296	1396	1496	
3600	79	179	279	379	479	579	679	779	879	979	1079	1179	1279	1379	1479	
5200	66	166	266	366	466	566	666	766	866	966	1066	1166	1266	1366	1466	
5400	65	165	265	365	465	565	665	765	865	965	1065	1165	1265	1365	1465	
5800	62	162	262	362	462	562	662	762	862	962	1062	1162	1262	1362	1462	

SAR Test Exclusion Thresholds for < 100 MHz and < 200 mm

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table.

MHz	< 50	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	237	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	mW
50	308	617	625	634	643	651	660	669	677	686	695	703	712	721	729	738	
10	474	948	961	975	988	1001	1015	1028	1041	1055	1068	1081	1095	1108	1121	1135	
1	711	1422	1442	1462	1482	1502	1522	1542	1562	1582	1602	1622	1642	1662	1682	1702	
0.1	948	1896	1923	1949	1976	2003	2029	2056	2083	2109	2136	2163	2189	2216	2243	2269	
0.05	1019	2039	2067	2096	2125	2153	2182	2211	2239	2268	2297	2325	2354	2383	2411	2440	
0.01	1185	2370	2403	2437	2470	2503	2537	2570	2603	2637	2670	2703	2737	2770	2803	2837	

2.3 RF Exposure calculations

From §FCC 1.1310 table 1, the maximum permissible RF exposure for an uncontrolled environment is 1 mW/(cm²) (or 10 W/m²)*

Power density (S) is calculated by the following formula:

$$S = (P * G) / 4\pi R^2$$

where, S = Power density (mW/cm²)

P = Output power to antenna (mW)

R = Distance between radiating structure and observation point (cm)

G = Gain of antenna in numeric

$\pi = 3.1416$

Example:

Assume a mobile device operates at 2412MHz and its maximum output power is 50mW, and the maximum gain of antenna is 1 (numeric) /0dBi.

then the power density (S) = $(50 * 1) / 4 * \pi * 20^2 = 0.00995$ (mW/cm²) (or = 0.0995 W/m²)

2.4 Operation mode

The EUT was supplied with 120Vac, 60Hz

TX Mode: Based on “M Tool” to execute, and select different frequency and modulation.

With individual verifying, the maximum output power was found out 1 Mbps data rate for 802.11b mode, 6 Mbps data rate for 802.11g mode, 6.5 Mbps data rate for 802.11n HT 20 mode.

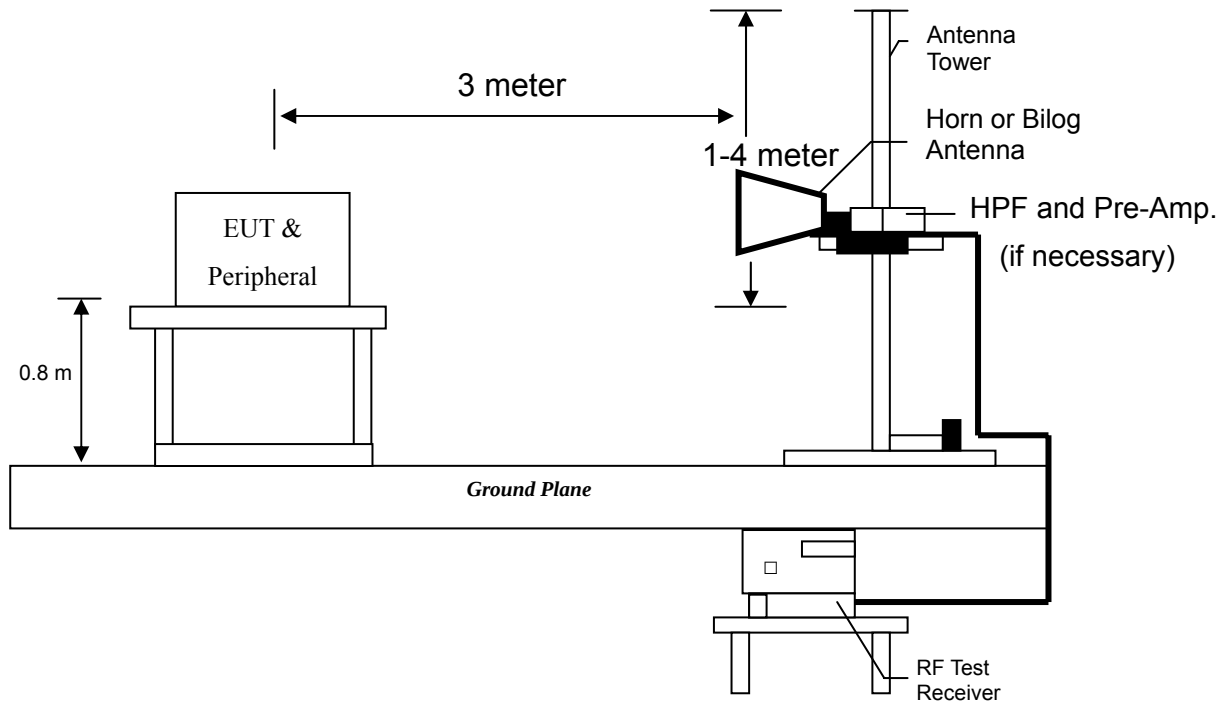
2.5 Test equipment

Equipment	Brand	Model No.	Serial No.	Calibration Date	Next Calibration Date
ESCI EMI Test Receiver	Rohde & Schwarz	ESCI	100018	2013/12/03	2014/12/02
Spectrum Analyzer	Rohde&schwarz	FSEK30	100186	2014/01/20	2015/01/19
Horn Antenna (1-18G)	Schwarzbeck	BBHA 9120 D	9120D-456	2012/09/03	2014/09/02
Horn Antenna (14-42G)	SHWARZBECK	BBHA 9170	BBHA9170159	2012/09/05	2014/09/04
Broadband Antenna	SCHWARZBECK	VULB 9168	9168-172	2013/08/08	2015/08/07
Loop Antenna	RolfHeine	LA-285	02/10033	2014/3/18	2016/03/16
Pre-Amplifier	MITEQ	AFS44-00102650 --42-10P-44	1495287	2013/10/27	2015/10/26
Pre-Amplifier	MITEQ	JS4-26004000--2 7-8A	828825	2012/9/18	2014/9/17
Power Meter	Anritsu	ML2495A	0844001	2013/10/10	2014/10/09
Power Sensor	Anritsu	MA2411B	0738452	2013/10/10	2014/10/09
Temperature&Humidity Test Chamber	TERCHY	MHU-225LRU (SA)	950838	2014/6/12	2015/06/11
Two-Line V-Network	Rohde & Schwarz	ENV216	101159	2014/06/16	2015/06/15
Singal Analyzer	Agilent	N9030A	MY51380492	2013/09/19	2014/09/18

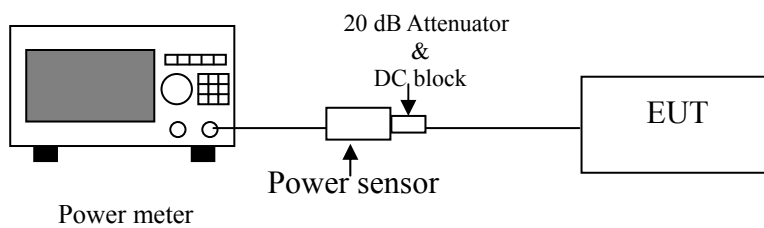
Note: The above equipments are within the valid calibration period.

2.6 Test Set-up

For BT 2.0



For WiFi, BT 4.0



Remark: Cable loss is 2 dB.

3. Test results

For WiFi

Mode	Channel	Frequency (MHz)	Antenna Gain0 (numeric)	Output power to antenna 0 (mW)	Power density (mW/cm ²)	Limit of power density (mW/cm ²)
802.11b	1	2412	0.87	26.98	0.005	1.0
	6	2437	0.87	28.64	0.005	1.0
	11	2462	0.87	27.16	0.005	1.0
802.11g	1	2412	0.87	19.54	0.003	1.0
	6	2437	0.87	19.82	0.003	1.0
	11	2462	0.87	20.65	0.004	1.0
802.11n (HT20)	1	2412	0.87	18.84	0.003	1.0
	6	2437	0.87	19.54	0.003	1.0
	11	2462	0.87	19.68	0.003	1.0

The Notice in Installation Manual has been stated as below:

While installing and operating this transmitter, the radio frequency exposure limit of 1 mW/(cm²) may be exceeded at distances close to the transmitter. Therefore, the user must maintain a minimum distance of 20 cm from the device at all time.

For BT 4.0

Mode	Channel	Frequency (MHz)	Antenna Gain0 (numeric)	Output power to antenna 0 (mW)	Power density (mW/cm ²)	Limit of power density (mW/cm ²)
BT 4.0	0	2402	0.87	5.45	0.0009	1.0
	20	2442	0.87	5.48	0.0010	1.0
	39	2480	0.87	5.33	0.0009	1.0

The Notice in Installation Manual has been stated as below:

While installing and operating this transmitter, the radio frequency exposure limit of 1 mW/(cm²) may be exceeded at distances close to the transmitter. Therefore, the user must maintain a minimum distance of 20 cm from the device at all time.

For BT 2.0

The EUT is a mobile device with the max. peak output power 97.29 dBuV/m at 3m (1.607 mW) much lower than the low threshold 96 mW at 50mm.