

5 FCC §2.1091, §1.1307 & ISED RSS-102 – RF Exposure

5.1 Applicable Standards

According to FCC §2.1091, and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
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 ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

According to ISED RSS-102 Issue 5 §2.5.2, Exemption Limits for Routine Evaluation- RF Exposure Evaluation,

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

5.2 MPE Prediction

As Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

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

5.3 MPE Result for FCC

NFC Standalone

Maximum peak EIRP at antenna input terminal (dBm): -3.29

Maximum peak EIRP at antenna input terminal (mW): 0.47

Prediction distance (cm): 20

Prediction frequency (MHz): 13.56

Power density of prediction frequency at 20.0 cm (mW/cm²): 0.000093

FCC MPE limit for uncontrolled exposure at prediction frequency: 0.979

Maximum peak EIRP was calculated from Section 6.9 of this test report: 91.91dBuV/m – 95.2 = -3.29 dBm

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.000093 mW/cm². Limit is 0.979 mW/cm².

Worst Case Co-location MPE Calculation:

Radio	Max EIRP (dBm)	Evaluated Distance (cm)	Worst-Case Exposure Level (mW/cm ²)	Limit (mW/cm ²)	Worst-Case Ratios	Sum of Ratios	Limit
BLE	14.80	20	0.006	1.0	0.006	0.006125	1.0
UWB	-8.24	20	0.00003	1.0	0.00003		
NFC	-3.29	20	0.000093	0.979	0.000095		

Note 1: BLE Max. EIRP is referenced from BACL report R2509243-247

Note 2: UWB Max. EIRP is referenced from BACL report R2509243-519

5.4 RF Exposure Evaluation for IC

NFC Standalone

Maximum EIRP power = -3.29 dBm (0.00047 W) which is less than exemption threshold of 1 W.

Therefore, the RF Exposure is exempt for IC.