FCC RF Exposure Evaluation

1. Product Information

Product name	Roku Keypad
Test Model	SS100KX
Power Supply	DC 4.5V By 3*AA Battery
Hardware Version	KP3U-P1.0-V1.3
Software Version	6.1.0.93
Frequency Range	906.8MHz, 910MHZ, 913.2MHz
Channel Number	3
Modulation Type	GFSK
Antenna Description	FPC Antenna, 0.283dBi (max.)
Exposure category	General population/uncontrolled environment
EUT Type	Production Unit
Device Type	Mobile Devices

2.Evaluation method and Limit

Systems operating under the provisions of FCC 47 CFR 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.
In accordance with 47 CFR FCC Part 2 Subpart J, section 2.1091 this device has been defined as mobile device whereby a distance of 0.2m normally can be maintained between the user and the device, and below RF Permissible Exposure limit shall comply with.
In accordance with KDB447498D01 for Simultaneous transmission MPE test exclusion applies when the sum of the MPE ratios for all simultaneous transmitting antennas incorporated in a host device, based on the calculated/estimated, numerically modelled or measured field strengths or power density, is ≤ 1.0. The MPE ratio of each antenna is determined at the minimum test separation distance required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to MPE limit, at the test frequency. Either the maximum peak or spatially averaged results from measurements or numerical simulations may be used to determine the MPE ratios. Spatial averaging does not apply when MPE is estimated using simple calculations based on far-field plane-wave equivalent conditions. The antenna installation and operating requirements for the host device must meet the minimum test separation distances required by all antennas, in both standalone and simultaneous transmission operations, to satisfy compliance.

3. Limit

3. 1 Refer Evaluation Method

ANSI C95.1–2019: IEEE Standard for Safety Levels with Respect to Human Exposure to Electric, Magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz
FCC KDB publication 447498 D01 General 1 RF Exposure Guidance v06: Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies.
FCC CFR 47 part1 1.1310: Radiofrequency radiation exposure limits.
FCC CFR 47 part2 2.1091: Radiofrequency radiation exposure evaluation: mobile devices.

3. 2 Limit

Limits for Maximum Permissible Exposure (MPE)/Controlled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm²)	Averaging Time (minute)
Limits for Occupational/Controlled Exposure				
0.3 – 3.0	614	1.63	(100) *	6
3.0 – 30	1842/f	4.89/f	(900/f²)*	6
30 – 300	61.4	0.163	1.0	6
300 – 1500	/	/	f/300	6
1500 – 100,000	/	/	5	6

Limits for Maximum Permissible Exposure (MPE)/Uncontrolled Exposure

Frequency Range(MHz)	Electric Field Strength(V/m)	Magnetic Field Strength(A/m)	Power Density (mW/cm²)	Averaging Time (minute)
Limits for Occupational/Uncontrolled Exposure				
0.3 – 3.0	614	1.63	(100) *	30
3.0 – 30	824/f	2.19/f	(180/f²)*	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

4. MPE Calculation Method

Predication of MPE limit at a given distance
Equation from page 18 of 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. Antenna Information

EUT can only use antennas certificated as follows provided by manufacturer;

Antenna type and antenna number	Operate frequency band	Maximum antenna gain	Notes
FPC Antenna	906.8-913.2MHz	0.283dBi	SRD Antenna

6. Conducted Power

Test Procedure

TX frequency range: 906.8MHz, 910MHZ, 913.2MHz

Mode	Channel	Frequency (MHz)	Field Strength (dBuV/m @3m)	Maximum Conducted Output Power (dBm)
GFSK	1	906.8	81.58	-13.58
	2	910	79.29	-15.87
	3	913.2	84.31	-10.85

Field Strength: dBuV/m @3m

Maximum Conducted Output Power: EIRP=E-104.7+20logD=E-104.7+20log3

Turn-up

Channel	Channel 1	Channel 2	Channel 3
Target (dBm)	-13.0	-15.0	-10.0
Tolerance ± (dB)	1.0	1.0	1.0

7. Evaluation Results

As declared by the Applicant, the EUT is a wireless device used in a fix application, at least 20 cm from any body part of the user or nearby persons; from the maximum EUT RF output power, the minimum separation distance, r =20cm, as well as the gain of the used antenna refer to antenna information, the RF power density can be obtained.

[*SRD*]

Modulation Type	Output power		Antenna Gain (dBi)	Antenna Gain (linear)	MPE (mW/cm2)	MPE Limits (mW/cm2)
	dBm	mW				
GFSK	-12.0	0.0631	0.283	1.0673	0.00001	0.6045
	-14.0	0.0398	0.283	1.0673	0.00001	0.6045
	-9.0	0.1259	0.283	1.0673	0.00003	0.6045

Remark:
1. Output power including turn-up tolerance;
2. Output power was adjust to duty cycle at 100% if measured duty cycle less than 98%;
3. MPE evaluate distance is 20cm from user manual provide by manufacturer.

8. Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1093 for the uncontrolled RF Exposure and SAR Exclusion Threshold per KDB 447498 v06.

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