

**RF Exposure Evaluation**

Standard	CFR 47 Part 2.1091(c)
	KDB 447498 D01 V06

Limits

The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency (RF) radiation as specified in 1.1310

Limits for Maximum Permissible Exposure (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled Exposures				
0.3–3.0	614	1.63	*(100)	6
3.0–30	1842/f	4.89/f	*(900/f ²)	6
30–300	61.4	0.163	1.0	6
300–1500			f/300	6
1500–100,000			5	6
(B) 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

Friis transmission formula: $Pd = (Pout * G) / (4 * \pi * r^2)$

Where

Pd = power density in mW/cm², **Pout** = output power to antenna in mW;

G = gain of antenna in linear scale, **Pi** = 3.1416;

R = distance between observation point and center of the radiator in cm

Pd is the limit of MPE, 1 mW/cm². If we know the maximum gain of the antenna and the total power input to the antenna, through the calculation, we will know the distance r where the MPE limit is reached.



FCC RF Exposure Exemption Criteria

The exemption criteria for RF exposure evaluation from CFR 47 Part 2.1091(c) are as follows:

(c)(1) Mobile devices that operate in the Commercial Mobile Radio Services pursuant to part 20 of this chapter; the Cellular Radiotelephone Service pursuant to part 22 of this chapter; the Personal Communications Services pursuant to part 24 of this chapter; the Satellite Communications Services pursuant to part 25 of this chapter; the Miscellaneous Wireless Communications Services pursuant to part 27 of this chapter; the Maritime Services (ship earth station devices only) pursuant to part 80 of this chapter; the Specialized Mobile Radio Service, and the 3650 MHz Wireless Broadband Service pursuant to part 90 of this chapter; and the Citizens Broadband Radio Service pursuant to part 96 of this chapter are subject to routine environmental evaluation for RF exposure prior to equipment authorization or use if:

(i) They operate at frequencies of 1.5 GHz or below and their effective radiated power (ERP) is 1.5 watts or more, or

(ii) They operate at frequencies above 1.5 GHz and their ERP is 3 watts or more.

(2) Unlicensed personal communications service devices, unlicensed millimeter wave devices and unlicensed NII devices authorized under §§15.253(f), 15.255(g), 15.257(g), 15.319(i), and 15.407(f) of this chapter are also subject to routine environmental evaluation for RF exposure prior to equipment authorization or use if their ERP is 3 watts or more or if they meet the definition of a portable device as specified in §2.1093(b) requiring evaluation under the provisions of that section.

(3) All other mobile and unlicensed transmitting devices are categorically excluded from routine environmental evaluation for RF exposure prior to equipment authorization or use, except as specified in §§1.1307(c) and 1.1307(d) of this chapter.



Test Procedure

Software provided by client enabled the EUT to transmit and receive data at lowest, middle and highest channel individually.

According to KDB447498 General RF Exposure Guidance V06 Section 7.2 to test details are as follows

transmission configurations, further equipment approval is not required to incorporate transmitter modules in host devices that operate in the *mixed mobile and portable host* platform exposure conditions. The grantee is responsible for documenting this according to Class I permissive change requirements. Antennas that qualify for standalone SAR test exclusion must apply the estimated standalone SAR to determine simultaneous transmission test exclusion.

- a) The $[\sum \text{of (the highest measured or estimated SAR for each standalone antenna configuration, adjusted for maximum tune-up tolerance)} / 1.6 \text{ W/kg}] + [\sum \text{of MPE ratios}] \leq 1.0$.
- b) The SAR to peak location separation ratios of all simultaneously transmitting antenna pairs operating in portable device exposure conditions are all ≤ 0.04 , and the $[\sum \text{of MPE ratios}] \leq 1.0$.

When RF exposure test exclusion does not apply, simultaneous transmission evaluation is required for mixed mobile device and portable device exposure conditions. For each simultaneous transmission configuration, the sum of the MPE ratios for the simultaneously transmitting antennas operating in mobile device exposure conditions must be determined according to the calculated/estimated, numerically modeled or measured field strengths or power density. For each simultaneous transmission configuration, the enlarged zoom scan measurement and volume scan post-processing procedures in KDB Publication 865664 D01 must be applied to test the simultaneously transmitting antennas operating in portable device exposure conditions. The $[(\text{highest measured simultaneous transmission SAR, adjusted for maximum tune-up tolerance}) / 1.6 \text{ W/kg}] + [\sum \text{of MPE ratios}]$ must be ≤ 1.0 for each simultaneous transmission configuration; otherwise, a PAG is required for the FCC to determine compliance on a case-by-case basis, with respect to antenna-to-antenna and antenna-to-user separation, device form factor, operating requirements and exposure conditions, etc.

For *mobile exposure host* platform devices to qualify for simultaneous transmission MPE test exclusion, all transmitters and antennas in the host must either be evaluated for MPE compliance, by measurement or computational modeling, or qualify for the standalone MPE test exclusion in 7.1. When modular transmitters are used, the minimum *test separation distance* required for each simultaneously transmitting antenna installed in the host device must satisfy MPE compliance for both standalone and simultaneous transmission operations. When simultaneous transmission MPE test exclusion applies, transmitter modules may be incorporated in host devices according to Class I permissive change requirements to document the test exclusion conditions.⁶⁸

Simultaneous transmission MPE test exclusion applies when the sum of the MPE ratios for all simultaneously transmitting antennas incorporated in a host device is ≤ 1.0 , according to calculated/estimated, numerically modeled, or measured field strengths or power density. 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 the MPE limit at the test frequency.⁶⁹ Either the maximum peak or spatially averaged results from measurements or numerical simulations may be used to determine the MPE ratios. Spatial averaging should not be applied 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 for all antennas, in both standalone and simultaneous transmission operations, to satisfy compliance.

When one of the following test exclusion conditions is satisfied for all combinations of simultaneous



Test Result of RF Exposure Evaluation

Mode	Output power to antenna (dBm)	Output power to antenna (mW)	Power Density at R=20cm (mW/cm ²)	Limit (mW/cm ²)	Result
WIFI 802.11 ah	26.95	495.45	0.16627	0.6	PASS
WIFI 2.4G	18.78	75.51	0.04044	1.0	PASS

Remark:

1. antenna gain=2.27dBi for 802.11 ah Halow WIF I ,antenna gain=4.3dBi for 802.11 b/g/n WIF I 2.4G
2. Simultaneously transmitting methods and limit for details, see Section 7.2 b),limit=1
3. Simultaneously transmitting mode

Max Pd (WIFI) =(0.16627/0.6) +(0.04044/1) = 0.31756,Pd1≤1,Result pass.