



RF Exposure Evaluation Declaration

FCC ID: XIA-CMS2

Applicant: NetComm Wireless Pty Ltd

Product: Wi-Fi 6 CloudMesh Satellite

Model No.: CMS2

FCC Classification: Digital Transmission System (DTS)
Unlicensed National Information Infrastructure (NII)

FCC Rule Part(s) FCC Part 2.1091

Test Procedure KDB 447498 D04 Interim General RF Exposure
Guidance v01

Reviewed By:

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The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

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Revision History

Report No.	Version	Description	Issue Date	Note
2201RSU011-U4	Rev. 01	Initial Report	2022-08-10	Valid

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1. General Information

1.1. Applicant

NetComm Wireless Pty Ltd

Level 5, 18-20 Orion Road, Lane Cove NSW 2066 Australia

1.2. Manufacturer

Casa Systems Inc.

100 Old River Road, Andover MA 01810 USA

1.3. Testing Facility

☐	Test Site – MRT Suzhou Laboratory
	Laboratory Location (Suzhou - Wuzhong) D8 Building, No.2 Tian'edang Rd., Wuzhong Economic Development Zone, Suzhou, China
	Laboratory Location (Suzhou - SIP) 4b Building, Liando U Valley, No.200 Xingpu Rd., Shengpu Town, Suzhou Industrial Park, China
	Laboratory Accreditations
	A2LA: 3628.01 FCC: CN1166 VCCI:
	CNAS: L10551 ISED: CN0001 ☐R-20025 ☐G-20034 ☐C-20020 ☐T-20020 ☐R-20141 ☐G-20134 ☐C-20103 ☐T-20104
☒	Test Site – MRT Shenzhen Laboratory
	Laboratory Location (Shenzhen) 1G, Building A, Junxiangda Building, Zhongshanyuan Road West, Nanshan District, Shenzhen, China
	Laboratory Accreditations
	A2LA: 3628.02 FCC: CN1284
	CNAS: L10551 ISED: CN0105
☐	Test Site – MRT Taiwan Laboratory
	Laboratory Location (Taiwan) No. 38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C.)
	Laboratory Accreditations
	TAF: L3261-190725 FCC: 291082, TW3261
	ISED: TW3261

1.4. Product Information

Product Name	Wi-Fi 6 CloudMesh Satellite
Model No.	CMS2
Serial No.	065625212300753 (Conducted Sample) 065625212300685 (Radiated Sample)
Wi-Fi Specification	802.11a/b/g/n/ac/ax
Antenna Information	Refer to Clause 1.5
Power Supply	AC/DC Adapter
Accessory	
Adapter	Model: S24B72-120A200-0K Input: 100 - 240V ~ 50/60Hz 0.8A Output: 12.0V 2.0A, 24W
Remark: The information of EUT was provided by the manufacturer, and the accuracy of the information shall be the responsibility of the manufacturer.	

1.5. Antenna Details

Antenna Type	Frequency Band (MHz)	Tx Paths	Max. Antenna Gain (dBi)	Beamforming Directional Gain (dBi)	CDD Directional Gain (dBi)	
					For Power	For PSD
Dipole	2412 ~ 2462	2	3.41	6.42	3.41	6.42
	5180 ~ 5825	2	4.20	7.21	4.20	7.21
Remark: - The EUT supports Cyclic Delay Diversity (CDD) mode, and CDD signals are correlated. If all antennas have the same gain, G_{ANT}, Directional gain = $G_{ANT} + \text{Array Gain}$, where Array Gain is as follows. - For power spectral density (PSD) measurements on all devices, Array Gain = $10 \log (N_{ANT} / N_{SS})$ dB; - For power measurements on IEEE 802.11 devices, Array Gain = 0 dB for $N_{ANT} \leq 4$; - The EUT also supports Beam Forming mode, and the Beam Forming support 802.11n/ac/ax, not include 802.11a/b/g. BF Directional gain = $G_{ANT} + 10 \log (N_{ANT})$. For beamforming operation, manufacturer automatically backs power down based on a $10 \log (N_{ANT})$ factor based on CDD power. Therefore, only the CDD mode was evaluated in this report. Therefore, only the CDD mode was evaluated in the report.						

1.6. Device Classification

According to the user manual, the antenna of this device is at least 40cm away from the body of the user, this device is classified as a **Mobile Device**. Therefore, the RF exposure evaluation requirements of FCC Part 2.1091 for mobile device exposure conditions subject to MPE limits.

2. RF Exposure Evaluation

2.1. Test Limits

According to FCC Part 2.1091, A mobile device is defined as a transmitting device designed to be used in other than fixed locations and to generally be used in such a way that a separation distance of at least 20 cm is normally maintained between the RF source's radiating structure(s) and the body of the user or nearby persons.

According to FCC Part 1.1307(b)(3)(i)(C), for the exemption in Table 1 to apply, R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole.

Table 1 to § 1.1307(b)(3)(i)(C) - Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	$1.920 R^2$
1.34-30	$3.450 R^2/f^2$
30-300	$3.83 R^2$
300-1500	$0.0128 R^2 f$
1500-100,000	$19.2 R^2$

f = frequency in MHz, R = minimum separation distance in meters.

According to FCC Part 1.1307(b)(3)(ii)(B), in the case of fixed RF sources operating in the same time-averaging period, or of multiple mobile or portable RF sources within a device operating in the same time averaging period, if the sum of the fractional contributions to the applicable thresholds is less than or equal to 1 as indicated in the following equation.

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure Limit_k} \leq 1$$

2.2. Test Result

Product	Wi-Fi 6 CloudMesh Satellite
Test Item	RF Exposure Evaluation

Test Mode	Frequency Band (MHz)	Max. Conducted Power (dBm)	Max. Antenna Gain (dBi)	EIRP (dBm)	ERP (W)	Compliance Distance (R) (m)	Threshold ERP (W)
802.11b/g/n/ax	2412 ~ 2462	29.86	3.41	33.27	1.29	0.4	3.072
802.11a/n/ac/ax	5180 ~ 5825	29.62	4.20	33.82	1.47	0.4	3.072

Note:

1. $EIRP (dBm) = \text{Max. Conducted Power (dBm)} + \text{Max. Antenna Gain (dBi)}$
2. $ERP (W) = 10^{[ERP (dBm) - 30]/10} = 10^{[EIRP (dBm) - 2.15 (dB) - 30]/10}$
3. $\text{Threshold ERP (W)} = 19.2 * R^2 (W) = 19.2 * 0.4^2 (W) = 3.072 (W)$

The 2.4GHz WLAN and 5GHz WLAN can transmit simultaneously with Wi-Fi.

$$\text{Exposure Ratio} = 1.29 / 3.072 + 1.47 / 3.072 = 0.90 < 1.$$

Therefore, this device meets the RF Exposure requirements when it is installed and operated with a minimum distance of 40cm between the radiator and user.