

## RF Exposure

### Standard Applicable:

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

This is a Portable device with its physical nature to be used nearby, the distance between radiating structure and human is less than 20cm.

As per KDB 447498 D01 §4.3.1.1, The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm, and  $\leq 5$  m (not to exceed) are determined by:

$$\left[ \frac{\text{(max. power of channel, including tune-up tolerance, mW)}}{\text{(min. test separation distance, mm)}} \right] \cdot$$

$$\left[ \sqrt{f(\text{GHz})} \right] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

*f (GHz) is the RF channel transmit frequency in GHz*

*Power and distance are rounded to the nearest mW and mm before calculation*

The operational distance is 10mm with the verification of KDB inquiry, tracking number with 803558, that KDB941225 D07 can be referred and used to evaluate the most proper way how RF exposure concern shall be met.

**Measurement Result:****IEEE 802.11b/g/n\_20MHz****802.11b**

| Cable loss = 0 |                 | Average Power Output (dBm) |      |      |      |            |
|----------------|-----------------|----------------------------|------|------|------|------------|
| CH             | Frequency (MHz) | Data Rate                  |      |      |      | Power (mW) |
|                |                 | 1                          | 2    | 5.5  | 11   |            |
| 1              | 2412            | 9.51                       | 9.56 | 9.57 | 9.54 | 9.06       |
| 6              | 2437            | 9.78                       | 9.79 | 9.82 | 9.78 | 9.59       |
| 11             | 2462            | 9.25                       | 9.27 | 9.69 | 9.66 | 9.31       |

**802.11g**

| Cable loss = 0 |                 | Average Power Output(dBm) |      |      |      |      |      |      |      |            |
|----------------|-----------------|---------------------------|------|------|------|------|------|------|------|------------|
| CH             | Frequency (MHz) | Data Rate                 |      |      |      |      |      |      |      | Power (mW) |
|                |                 | 6                         | 9    | 12   | 18   | 24   | 36   | 48   | 54   |            |
| 1              | 2412            | 9.56                      | 9.41 | 9.38 | 9.44 | 9.37 | 9.33 | 9.35 | 9.47 | 9.03       |
| 6              | 2437            | 9.86                      | 9.80 | 9.79 | 9.83 | 9.75 | 9.68 | 9.73 | 9.67 | 9.68       |
| 11             | 2462            | 9.66                      | 9.63 | 9.62 | 9.64 | 9.60 | 9.51 | 9.57 | 9.52 | 9.25       |

**802.11n\_20M**

| Cable loss = 0 |                 | Average Power Output(dBm) |      |      |      |      |      |      |      |            |
|----------------|-----------------|---------------------------|------|------|------|------|------|------|------|------------|
| CH             | Frequency (MHz) | Data Rate                 |      |      |      |      |      |      |      | Power (mW) |
|                |                 | MCS0                      | MCS1 | MCS2 | MCS3 | MCS4 | MCS5 | MCS6 | MCS7 |            |
| 1              | 2412            | 9.42                      | 9.47 | 9.43 | 9.41 | 9.39 | 9.41 | 9.40 | 9.39 | 8.85       |
| 6              | 2437            | 9.85                      | 9.87 | 9.79 | 9.81 | 9.80 | 9.79 | 9.75 | 9.77 | 9.71       |
| 11             | 2462            | 9.65                      | 9.66 | 9.64 | 9.65 | 9.64 | 9.62 | 9.63 | 9.61 | 9.25       |

Bluetooth:

**BR mode (GFSK):**

| Frequency (MHz) | Output Power (dBm) | Duty Cycle | Output Power (mW) |
|-----------------|--------------------|------------|-------------------|
| 2402.00         | 0.81               | 0.77       | 0.92788           |
| 2441.00         | 0.91               | 0.77       | 0.94949           |
| 2480.00         | 0.71               | 0.77       | 0.90676           |

**EDR mode ( $\pi/4$ DQPSK):**

| Frequency (MHz) | Output Power (dBm) | Duty Cycle | Output Power (mW) |
|-----------------|--------------------|------------|-------------------|
| 2402.00         | 3.45               | 0.77       | 1.70408           |
| 2441.00         | 3.67               | 0.77       | 1.79263           |
| 2480.00         | 3.40               | 0.77       | 1.68458           |

**EDR mode (8DPSK):**

| Frequency (MHz) | Output Power (dBm) | Duty Cycle | Output Power (mW) |
|-----------------|--------------------|------------|-------------------|
| 2402.00         | 3.96               | 0.77       | 1.91642           |
| 2441.00         | 4.16               | 0.77       | 2.00674           |
| 2480.00         | 3.89               | 0.77       | 1.88578           |

Step 1: ( $\leq 5$ mm)

This is a portable device and the Max peak output power is (9.68mW) lower than the threshold given and derived as formula given above, where

Test with 1gram SAR with 10mm separation

Limit of threshold:

| Limit on 10 gram | Limit on 1 gram |
|------------------|-----------------|
| 7.5              | 3.0             |

Tolerance = 2.5dB, please refer to operational description for further detail

Wifi 802.11b/g/n\_20MHz:

| Mode    | Frequency | Power<br>(avg in dBm) | Power +<br>Tolerance | Power<br>(avg mw) | Distance<br>(mm) | Threshold<br>(<10mm) |
|---------|-----------|-----------------------|----------------------|-------------------|------------------|----------------------|
| 802.11b | 2437      | 9.82                  | 12.32                | 17.06082389       | 10               | 2.66334707           |
| 802.11g | 2437      | 9.86                  | 12.36                | 17.21868575       | 10               | 2.687990717          |
| 802.11n | 2437      | 9.87                  | 12.37                | 17.25837892       | 10               | 2.694187176          |

Bluetooth:

| Mode          | Frequency | Power<br>(avg in dBm) | Power<br>(avg mw) | Distance<br>(mm) | Threshold<br>(<10mm) |
|---------------|-----------|-----------------------|-------------------|------------------|----------------------|
| GFSK          | 2441      | 0.7007                | 1.175086941       | 10               | 0.183592058          |
| $\pi$ /4DQPSK | 2441      | 2.8259                | 1.916858257       | 10               | 0.299484182          |
| 8DPSK         | 2441      | 3.2032                | 2.090836148       | 10               | 0.326665966          |

Test with 10gram SAR with 0mm separation, taken 5mm as the most conservative test distance

Wifi 802.11b/g/n\_20MHz:

| Mode    | Frequency | Power<br>(avg in dBm) | Power +<br>Tolerance | Power<br>(avg mw) | Distance<br>(mm) | Threshold<br>(<5mm) |
|---------|-----------|-----------------------|----------------------|-------------------|------------------|---------------------|
| 802.11b | 2437      | 9.82                  | 12.32                | 17.06082389       | 5                | 5.326694141         |
| 802.11g | 2437      | 9.86                  | 12.36                | 17.21868575       | 5                | 5.375981435         |
| 802.11n | 2437      | 9.87                  | 12.37                | 17.25837892       | 5                | 5.388374352         |

Bluetooth:

| Mode          | Frequency | Power<br>(avg in dBm) | Power<br>(avg mw) | Distance<br>(mm) | Threshold<br>(<5mm) |
|---------------|-----------|-----------------------|-------------------|------------------|---------------------|
| GFSK          | 2441      | 0.7007                | 1.175086941       | 5                | 0.367184116         |
| $\pi$ /4DQPSK | 2441      | 2.8259                | 1.916858257       | 5                | 0.598968365         |
| 8DPSK         | 2441      | 3.2032                | 2.090836148       | 5                | 0.653331932         |

Conclusion:

As the result of calculation result indicates, the RF exposure generating from given transmitter (transmitter employed digital modulation) can be excluded from SAR measurement, ( $<3.0$  and  $<7.0$ , respectively), and therefore is deemed compliant with RF exposure as per KDB 447498 D01, FCC.

**Standard Applicable:**

As per RSS-102, any transmitter shall be compliant with applicable RF exposure prior to being market. In §2.5.2, while the operative frequency range is “above 2.2 GHz and up to 3 GHz inclusively, and with output power (i.e. the higher of the conducted or radiated (e.i.r.p.) source-based, time-averaged output power) that is less than or equal to 20 mW for general public use and 100 mW for controlled use”

**Measurement Result:**

| Mode      | Power | Power<br>+<br>Tolerance | Gain | Radiated Power<br>or Conducted Power<br>(mW) |
|-----------|-------|-------------------------|------|--|
| 802.11b   | 9.59  | 12.09                   | -3   | 9.099132726                                  |
| 802.11g   | 9.68  | 12.18                   | -3   | 9.289663868                                  |
| 802.11n   | 9.71  | 12.21                   | -3   | 9.354056741                                  |
| Bluetooth | 1.79  | 1.79                    | -2.1 | 1.510080154                                  |

$$9.10 \text{ mW} < 20\text{mW}$$

Therefore, RF exposure generating from Bluetooth transmitter can be excluded based on RSS-102