

## RF Exposure Report

**Report No.:** MFCCOG-WTW-P21120247C

**FCC ID:** 2AH7L-UPSC

**Test Model:** PAS400

**Received Date:** Jun. 01, 2023

**Test Date:** Aug. 16, 2023

**Issued Date:** Sep. 02, 2025

**Applicant:** Schneider Electric Industries SAS

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Grenoble cedex 9

**Issued By:** Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch  
Lin Kou Laboratories

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**Test Location:** No. 19, Hwa Ya 2nd Rd., Wen Hwa Vil., Kwei Shan Dist., Taoyuan City  
33383, Taiwan

**FCC Registration /** 788550 / TW0003  
**Designation Number:**



This report is governed by, and incorporates by reference, the Conditions of Testing as posted at the date of issuance of this report at <http://www.bureauveritas.com/home/about-us/our-business/cps/about-us/terms-conditions/> and is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. Measurement uncertainty is only provided upon request for accredited tests. Statements of conformity are based on simple acceptance criteria without taking measurement uncertainty into account, unless otherwise requested in writing. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence or if you require measurement uncertainty; provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.

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### Release Control Record

Issue No.	Description	Date Issued
MFCCOG-WTW-P21120247C	Original release.	Sep. 02, 2025

## 1 Certificate of Conformity

**Product:** EcoStruxure™ Panel Server Entry

**Brand:** Schneider Electric

**Test Model:** PAS400

**Sample Status:** Engineering sample

**Applicant:** Schneider Electric Industries SAS

**Test Date:** Aug. 16, 2023

**FCC Rule Part:** FCC Part 2 (Section 2.1091 & 2.1093)

**Standards:** KDB 447498 D04 Interim General RF Exposure Guidance v01

The above equipment has been tested by **Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's RF characteristics under the conditions specified in this report.

**Prepared by :** Polly Chen , **Date:** Sep. 02, 2025  
Polly Chen / Specialist

**Approved by :** Jeremy Lin , **Date:** Sep. 02, 2025  
Jeremy Lin / Project Engineer

## 2 Applicable RF Exposure Limit

### § 1.1310 Radiofrequency radiation exposure limits.

(a) Specific absorption rate (SAR) shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in § 1.1307(b) of this part within the frequency range of 100 kHz to 6 GHz (inclusive).

(b) The SAR limits for occupational/controlled exposure are 0.4 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 8 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit for occupational/controlled exposure is 20 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 6 minutes to determine compliance with occupational/controlled SAR limits.

(c) The SAR limits for general population/uncontrolled exposure are 0.08 W/kg, as averaged over the whole body, and a peak spatial-average SAR of 1.6 W/kg, averaged over any 1 gram of tissue (defined as a tissue volume in the shape of a cube). Exceptions are the parts of the human body treated as extremities, such as hands, wrists, feet, ankles, and pinnae, where the peak spatial-average SAR limit is 4 W/kg, averaged over any 10 grams of tissue (defined as a tissue volume in the shape of a cube). Exposure may be averaged over a time period not to exceed 30 minutes to determine compliance with general population/uncontrolled SAR limits.

### (e) Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields

#### ➤ Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Average 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 <sup>2</sup> )*	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.

#### ➤ Limits for Occupational/Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Average Time (minutes)
Limits For General Population / Uncontrolled Exposure				
0.3-3.0	614	1.63	*(100)	≤6
3.0-30	1842/f	4.89/f	*(900/f <sup>2</sup> )	<6
30-300	61.4	0.163	1.0	<6
300-1,500			f/300	<6
1,500-100,000			5	<6

f = frequency in MHz. \* = Plane-wave equivalent power density.

### 3 Applicable Evaluation Criteria

#### ☒ 1 mW Blanket Exemption – §1.1307(b)(3)(i)(A)

- The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A).

#### ☒ MPE-based Exemption – §1.1307(b)(3)(i)(C)

- The minimum separation distance (R in meters) from the body of a nearby person for the frequency (f in MHz) at which the source operates, the ERP (watts) is no more than the calculated value prescribed for that frequency. Table applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits.

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	$3.83 R^2$
300-1,500	$0.0128 R^2 f$
1,500-100,000	$19.2 R^2$
R must be at least $\lambda/2\pi$ , where $\lambda$ is the free-space operating wavelength in meters.	

#### ☐ MPE-based Exemption – §1.1307(b)(3)(i)(B)

- For mobile devices that are not exempt per Table 1 of §1.1307(b)(1)(i)(C) and device at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz.

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

#### ☐ SAR-based Exemption - §1.1307(b)(3)(i)(B)

- The SAR-based exemption formula of §1.1307(b)(3)(i)(B), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold  $P_{th}$  (mW). This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

where

$$x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right)$$

and  $f$  is in GHz,  $d$  is the separation distance (cm)

When 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

#### 4 Calculation Result of Maximum Conducted Power

##### For Single RF Source

MPE-based Exemption §1.1307(b)(3)(i)(C)							
Operation Mode	Frequency Band (MHz)	Average Power (mW)	Antenna Gain (dBi)	Maximum ERP (mW)	Distance (cm)	Limit Threshold (mW)	Test Result
Bluetooth	2402-2480	0.1169	3.22	0.1496	20	768	Pass
Zigbee	2405-2480	0.9863	3.03	1.2078	20	768	Pass
WLAN 2.4 GHz	2412-2462	0.4198	3.22	0.5371	20	768	Pass
WLAN 5 GHz	5180-5825	0.3614	2.94	0.4335	20	768	Pass

##### For Multiple RF Sources (Simultaneous Operations Condition 1)

Multiple RF Sources (Simultaneous Operations)							
Exemption Evaluation					Sum of Ratios	Limit of Ratios	Test Result
Operation Mode	Frequency Band (MHz)	Maximum ERP (mW)	Limit Threshold (mW)	Ratio			
Bluetooth	2402-2480	0.1496	768	0.000195	0.003195	1	Pass
Zigbee	2405-2480	1.2078	768	0.002			
WLAN 2.4 GHz	2412-2462	0.5371	768	0.001			

##### For Multiple RF Sources (Simultaneous Operations Condition 2)

Multiple RF Sources (Simultaneous Operations)							
Exemption Evaluation					Sum of Ratios	Limit of Ratios	Test Result
Operation Mode	Frequency Band (MHz)	Maximum ERP (mW)	Limit Threshold (mW)	Ratio			
Bluetooth	2402-2480	0.1496	768	0.000195	0.003195	1	Pass
Zigbee	2405-2480	1.2078	768	0.002			
WLAN 5 GHz	5180-5825	0.4335	768	0.001			

##### Note:

1. The differences compared with the original report (BV CPS report no.: MFCCOG-WTW-P21120247B) is adding 2.4GHz Access Point Mode through F/W updaten and and the Client and AP modes have the same power settings and only Reduced Power settings. Due to no effect on any test item, no re-test is performed.
2. Detail antenna specification please refer to antenna datasheet and/or antenna measurement report.
3. Determining compliance based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.

#### 5 Conclusion

Source-base time average power is below Exemption Criteria and/or Routine Evaluation MPE thresholds, therefore the device is compliant FCC RF exposure requirement.

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