



RF Exposure Evaluation Declaration

FCC ID: 2AI9TOAW-AP152X
Applicant: ALE USA Inc.
Product: OmniAccess Stellar
Model No.: OAW-AP1521
Brand Name: Alcatel-Lucent Enterprise
FCC Rule Part(s): FCC Part 2.1091
Evaluated Date: 2024-10-29
Result: Complies

Reviewed By:

Vincent Yu

Approved By:

Robin Wu



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.

The test report shall not be reproduced except in full without the written approval of MRT Technology (Suzhou) Co., Ltd.

Revision History

Report No.	Version	Description	Issue Date	Note
2408RSU020-U7	V01	Initial Report	2024-12-24	Invalid
2408RSU020-U7	V02	Correct error of 5G frequency band	2025-01-10	Valid

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1. General Information

1.1. Applicant

ALE USA Inc.
2000 Corporate Center Drive Thousand Oaks, CA 91320

1.2. Manufacturer

ALE USA Inc.
2000 Corporate Center Drive Thousand Oaks, CA 91320

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 Location (Suzhou - Wujiang)			
	Building 1, No.1 Xingdong Road, Wujiang, Suzhou, Jiangsu, People’s Republic of China			
☐	Laboratory Accreditations			
	A2LA: 3628.01		CNAS: L10551	
	FCC: CN1166		ISED: CN0001	
	VCCI:	☐ 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		CNAS: L10551	
☐	FCC: CN1284		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: 3261			
	FCC: 291082, TW3261		ISED: TW3261	

1.4. Product Information

Product Name	OmniAccess Stellar
Model No.	OAW-AP1521
Wi-Fi Specification	802.11a/b/g/n/ac/ax/be
Bluetooth Specification	V5.1 single mode, BLE only
Zigbee Specification	802.15.4
Antenna Information	Refer to section 1.5
Power Type	AC/DC Adapter Input or PoE Input
Operating Environment	Indoor Use
Accessories	
Adapter	Model: ADP-50GR B Input: 100-240V ~ 1.3A 50-60Hz Output: 48.0V, 1.042A 50.1W
PoE Injector	Model: POE60U-1BT-X (ALE P/N: POE60U-1BT-X-R) Input: 100-240V ~ 1.5A, 50/60Hz Output: 56.0V, 0.535A, 30W PIN 3, 6+ PIN 1, 2 Return Output: 56.0V, 0.535A, 30W PIN 4, 5+ PIN 7, 8 Return
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

BLE/ZigBee

Antenna Type	Frequency Band (MHz)	Antenna Gain (dBi)
Dipole	2402 ~ 2480	5.3

Wi-Fi

Antenna Type	Frequency (MHz)	TX Paths	Max. Directional Gain (dBi)	
			Correlated	Uncorrelated
Wi-Fi Antenna				
PIFA	2412 ~ 2462	2	5.82	2.83
	5180 ~ 5825	4	9.12	3.18
PIFA & Dipole	5925 ~ 7125	2	4.84	4.84
Notes:				
1. The EUT supports Cyclic Delay Diversity (CDD) mode, and CDD signals are correlated.				
2. The EUT also supports Beam Forming mode, and the Beam Forming support 802.11n/ac/ax/be, not include 802.11a/b/g.				
3. For beamforming operation, the software automatically backs power down based on CDD power.				
4. The detail calculation method of directional gain refers to antenna report provided by the applicant.				
5. Uncorrelated Directional Gain is for EIRP calculation, and Correlated Directional Gain is for PSD calculation.				

1.6. Device Classification

According to the user manual, this device is classified as a Mobile Device. So, the RF exposure evaluation requirements of § 2.1091 for mobile device exposure conditions subject to MPE limits.

1.7. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 2.1091 & KDB 447498 D04 Interim General RF Exposure Guidance v01

2. RF Exposure Evaluation

2.1. Test Limits

According to FCC §1.1310: 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 §1.1307(b)

Limits For Maximum Permissible Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Average Time (Minutes)
(A) Limits for Occupational/ Control 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
300-1,500	--	--	f/300	<6
1,500-100,000	--	--	5	<6
(B) Limits for General Population/ Uncontrolled Exposures				
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
300-1,500	--	--	f/1500	<30
1,500-100,000	--	--	1.0	<30

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

2.2. MPE Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option 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 §1.1307(b)(3)(ii)(A) of this section.

Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

$$P_{th}(mW) = \{ERP_{20cm}(d / 20cm)^x \quad d \leq 20cm$$

$$P_{th}(mW) = \{ERP_{20cm} \quad 20cm < d \leq 40cm$$

Where

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

and

$$ERP_{20cm}(mW) = \{2040f \quad 0.3GHz \leq f < 1.5GHz$$

$$ERP_{20cm}(mW) = \{3060 \quad 1.5GHz \leq f \leq 6GHz$$

(Option C) Or using Table 1 and 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. 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 (1.64 linear value).

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	1920R ²
1.34-30	3450R ² /f ²
30-300	3.83R ²
300-1,500	0.0128R ² f
1,500-100,000	19.2R ²

For multiple RF sources: Multiple RF sources are exempt if:

(A) The available maximum time-averaged power of each source is no more than 1 mW and there is a separation distance of two centimeters between any portion of a radiating structure operating and the nearest portion of any other radiating structure in the same device, except if the sum of multiple sources is less than 1 mW during the time-averaging period, in which case they may be treated as a single source (separation is not required). This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(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.

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

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th} , including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source i at a distance between 0.5 cm and 40 cm (inclusive).

$P_{th,i}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i .

ERP_j = the ERP of fixed, mobile, or portable RF source j .

$ERP_{th,j}$ = exemption threshold ERP for fixed, mobile, or portable RF source j , at a distance of at least $\lambda/2\pi$ according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

$Evaluated_k$ = the maximum reported SAR or MPE of fixed, mobile, or portable RF source k either in the device or at the transmitter site from an existing evaluation at the location of exposure.

$Exposure Limit_k$ = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source k , as applicable from §1.1310 of this chapter.

2.3. Calculated Result

Product	OmniAccess Stellar (OAW-AP1521)
Test Item	RF Exposure Evaluation

Test Mode	Frequency Band (MHz)	Max. Tune-up Conducted Power (dBm)	Antenna Gain (dBi)	Tune-up ERP (dBm)	Tune-up ERP (mW)
BLE	2400 ~ 2483.5	10.00	5.30	13.15	20.65
ZigBee	2400 ~ 2483.5	10.00	5.30	13.15	20.65
2.4G Wi-Fi	2400 ~ 2483.5	22.00	2.83	22.68	185.35
5G Wi-Fi	5150 ~ 5850	24.00	3.18	25.03	318.42
6G Wi-Fi	5925 ~ 7125	22.00	4.84	24.69	294.44

Notes:

1. Tune-up power was declared by manufacturer.
2. Tune-up ERP = Tune up Conducted Power + Antenna Gain - 2.15.

For BLE/ZigBee/2.4G Wi-Fi/5G Wi-Fi Antenna, Option B

Test Mode	Frequency Band (MHz)	R (m)	Tune-up ERP (mW)	Threshold ERP (mW)
BLE	2400 ~ 2483.5	0.20	20.65	3060.0
ZigBee	2400 ~ 2483.5	0.20	20.65	3060.0
2.4G Wi-Fi	2400 ~ 2483.5	0.20	185.35	3060.0
5G Wi-Fi	5150 ~ 5850	0.20	318.42	3060.0

Note: R is from user manual.

For 6G Wi-Fi Antenna, Option C

Test Mode	Frequency Band (MHz)	$\lambda / 2 \pi$ (m)	R (m)	Tune-up ERP (mW)	Threshold ERP (mW)
6G Wi-Fi	5925 ~ 7125	0.04	0.20	294.44	768.0

Note: R is from user manual.

For multiple RF sources

Wi-Fi 2.4GHz, 5GHz, 6GHz and BLE/ZigBee can transmit simultaneously.

So the Max Simultaneous Transmission ratio = $20.65 / 3060.0 + 185.35 / 3060.0 + 318.42 / 3060.0 + 294.44 / 768.0 = 0.55 < 1$

Conclusion:

The device qualifies for RF exposure test exemption at 20cm distance.

The End
