

RF Exposure Considerations for the LINK.10

FCC ID: 2ALENLINK10

The above device operates using a 13.56 MHz transmitter and uses a pre-certified Bluetooth LE Module (FCC ID: XPYNORAB1) in 2402-2480MHz frequency band. The transmitters can transmit simultaneously. The FCC requires that the calculated MPE be equal to or less than a given limit dependent on frequency at a distance of 20 cm from a device to the body of a user.

The following FCC Rule Parts and procedures are applicable:

- Part 1.1310 – Radiofrequency radiation exposure limits
- Part 2.1091 – Radiofrequency radiation exposure evaluation: mobile devices
- KDB447498 D01 v06 – Mobile and Portable Devices RF Exposure Procedures and Equipment Authorisation Policies

LINK.10 MAXIMUM TRANSMITTER POWER CONSIDERATIONS

13.56 MHz:

Tx Power_{max} (declared): 16.92 dBμV/m @30m = 56.92 dBμV/m @3m* = -38.28 dBm EIRP

* Extrapolation factor of 40 dB was used for calculation.

2402-2480 MHz (pre-certified Bluetooth LE Module (FCC ID: XPYNORAB1):

Tx Power: 3.0 dBm (conducted)

Antenna gain: 2.0 dBi

EIRP = 3.0 dBm + 2.0 dBi = 5.0 dBm

MPE CALCULATIONS

The MPE calculation to calculate the safe operating distance for the user is.

$$S = \text{EIRP} / 4 \pi R^2$$

Where S = Power density

EIRP = Effective Isotropic Radiated Power

R = distance to the centre of radiation of the antenna (safe operating distance)

For 13.56MHz:

Values:

EIRP = -38.28 dBm
= 0.15×10^{-6} W
= 0.15×10^{-3} mW

R = 20cm

Power Density Requirement

From Table 1 to § 1.1310(e)(1)- Limits for General Population/ Uncontrolled Exposure of FCC Rule Part 1.1310 for 13.56MHz

$$\begin{aligned} S_{\text{req1}} &= 180/f^2 \\ &= 0.98 \text{ mW/cm}^2 \end{aligned}$$

Calculation:

$$\begin{aligned} S &= 0.15 \times 10^{-3} / 4 \pi R^2 \\ S &= 0.15 \times 10^{-3} / (12.56 \times 20^2) \\ S &= 0.15 \times 10^{-3} / (5024) \\ \mathbf{S_1} &= \mathbf{3 \times 10^{-8} \text{ mW/cm}^2} (< 0.98 \text{ mW/cm}^2) \end{aligned}$$

For 2402-2480 MHz:

Values:

EIRP = 5.0 dBm
= 3.2 mW
R = 20cm

Power Density Requirement

From Table 1 to § 1.1310(e)(1)- Limits for General Population/ Uncontrolled Exposure of FCC Rule Part 1.1310 for 2402-2480 MHz

$$\mathbf{S_{req2} = 1.0 \text{ mW/cm}^2}$$

Calculation:

$$\begin{aligned} S &= 3.2 / 4 \pi R^2 \\ S &= 3.2 / (12.56 \times 20^2) \\ S &= 3.2 / (5024) \\ \mathbf{S_2} &= \mathbf{0.0006 \text{ mW/cm}^2} (< 1.0 \text{ mW/cm}^2) \end{aligned}$$

KDB447498 D01 v06 Section 7.2 SIMULTANEOUS TRANSMISSION CONSIDERATIONS

The equipment operates from a single antenna. All transmitters can transmit simultaneously.
As per KDB, summation of calculated MPE ratios for 13.56 MHz and 2402-2480 MHz:

$$\begin{aligned} \Sigma \text{MPE}_{\text{ratios}} &= (\mathbf{S_1 / S_{req1}}) + (\mathbf{S_2 / S_{req2}}) \\ &= (3 \times 10^{-8} / 0.98) + (0.0006 / 1.0) \\ &= \mathbf{0.0006} \end{aligned}$$

Σ of MPE ratios < 1.0, so in accordance with KDB447498 Section 7.2, simultaneous transmission test exclusion applies for the transmitters.

Conclusion

The required 20cm RF exposure limits for General Population/Uncontrolled Exposure will not be exceeded for the LINK.10.

Yours sincerely
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