

1. RF Exposure Requirements

1.1 General Information

Client Information	
Applicant:	PIN GENIE, INC. DBA LOCKLY
Address of applicant:	2024 Macopin Rd., Unit E, West Milford, NJ 07480 United States
Manufacturer:	Smart Electronic Industrial (Dong Guan) Co., Ltd.
Address of manufacturer:	Qing Long Road, Long Jian Tian Village, Huang Jiang Town, Dong Guan, Guang Dong, China
General Description of EUT:	
Product Name:	LOCKLY LUX COMPACT MORTISE EDITION WITH RFID
Trade Name	LOCKLY
Model No.:	PGD688FC
Adding Model(s):	/
Rated Voltage:	DC6V
Power Adapter:	/
FCC ID:	2ASIVPGD688FNC
Equipment Type:	Fixed device
Technical Characteristics of EUT:	
Bluetooth	
Bluetooth Version:	V5.0 (BLE mode)
Frequency Range:	2402-2480MHz
RF Output Power:	-0.06dBm (Conducted)
Data Rate:	1Mbps
Modulation:	GFSK
Quantity of Channels:	40
Channel Separation:	2MHz
Type of Antenna:	FPC Antenna
Antenna Gain:	0.5dBi
NFC	
Support Standards:	NFC
Frequency Range:	13.56MHz
Max. Field Strength:	47.57dBuV/m (at 3m)
Antenna Type:	FPC Antenna
Support Standards:	NFC

1.2 RF Exposure Exemption

According to §1.1307(b)(3) and KDB 447498 D04 Interim General RF Exposure Guidance v01, system operating under the provisions of this section shall be operating in a manner that the public is not exposed to radio frequency energy level in excess limit for maximum permissible exposure.

Option A: FCC Rule Part 1.1307 (b)(3)(i)(A): The available maximum time-averaged power is no more than 1mW, regardless of separation distance.

Option B: FCC Rule Part 1.1307 (b)(3)(i)(B): The available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula. P_{th} is given by:

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

Where

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

and

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

d = the separation distance (cm);

Option C: FCC Rule Part 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. R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters.

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	$3.83 R^2$
300-1,500	$0.0128 R^2 f$
1,500-100,000	$19.2 R^2$

For Multiple RF sources: FCC Rule Part 1.1307(b)(3)(ii):

(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).

- (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.

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

1.3 Calculated Result

Radio Access Technology	Prediction Frequency (MHz)	Output Power (dBm)	Antenna Gain (dBi)	Duty Cycle (%)	Tune-Up Time-Averaged Power (dBm)	ERP (dBm)
Bluetooth	2402	-0.06	0.5	100	0.00	-1.65
NFC	13.56	-47.69	0	/	-47.00	-49.15

Frequency (MHz)	Option	Min. Distance (cm)	Max. Power (dBm)	Max. Power (mW)	Exposure Limit (mW)	Ratio	Result Pass/Fail
2402	B	0.5	0.00	1.00	2.788	0.36	Pass
13.56	B	0.5	-47.00	0.00	2997.21	0.01	Pass

Note: 1. a. Time-Averaged Power=Output Power * Duty Cycle;

ERP= Time-Averaged Power+ Antenna gain-2.15dB;

b. EIRP= E-104.8+20logD; Output Power=EIRP- Antenna Gain;

ERP=EIRP-2.15dB

2. Option A, B and C refers as clause 1.2.

3. For option B, Max (time-averaged power, effective radiated power (ERP)) converts to Max. Power. For option C, ERP converts to Max. Power;

4. For option B, P_{th} (mW) converts to Exposure Limit (mW); For option C, ERP (W) converts to Exposure Limit (mW).

5. Ratio= Tune-Up ERP (mW)/ Exposure Limit (mW)

Mode for Simultaneous Multi-band Transmission:

Radio Access Technology	Ratio 1	Ratio 2	Simultaneous Ratio	Limit	Result Pass/Fail
Bluetooth + NFC	0.36	0.01	0.37	1	Pass

Result: Pass