

1. RF Exposure Requirements

1.1 General Information

Client Information

Applicant: PIN GENIE, INC. DBA LOCKLY
Address of applicant: 676 Transfer Rd., St. Paul, MN 55114

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: ENABLES WI-FI, RF &BLE CONNECTIVITY FOR LOCKLY SMART LOCKS
Trade Name: LOCKLY
Model No.: PGH200
Adding Model(s): /
Rated Voltage: DC5V
FCC ID: 2ASIVPGH200UM
Equipment Type: Mobile device

Technical Characteristics of EUT:

Wi-Fi

Support Standards: 802.11b, 802.11g, 802.11n-HT20/40
Frequency Range: 2412-2462MHz for 802.11b/g/n(HT20)
2422-2452MHz for 802.11n(HT40)
RF Output Power: 18.30dBm (Conducted)
Type of Modulation: CCK, OFDM, QPSK, BPSK, 16QAM, 64QAM
Quantity of Channels: 11 for 802.11b/g/n(HT20); 7 for 802.11n(HT40)
Channel Separation: 5MHz
Type of Antenna: PCB Antenna
Antenna Gain: 3.13dBi

Bluetooth 1

Bluetooth Version: V4.2 (BLE mode)
Frequency Range: 2402-2480MHz
RF Output Power: 3.519dBm (Conducted)
Data Rate: 1Mbps
Modulation: GFSK
Quantity of Channels: 40
Channel Separation: 2MHz
Type of Antenna: PCB Antenna
Antenna Gain: 3.13dBi

Bluetooth 2

Bluetooth Version:	V4.2 (BLE mode)
Frequency Range:	2402-2480MHz
RF Output Power:	3.515dBm (Conducted)
Data Rate:	1Mbps
Modulation:	GFSK
Quantity of Channels:	40
Channel Separation:	2MHz
Type of Antenna:	FPC Antenna
Antenna Gain:	4.12dBi

1.2 RF Exposure Exemption

According to §1.1307(b)(3) and 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	19.2R 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)
Wi-Fi	2412	18.3	3.13	100	19.00	19.98
Bluetooth 1	2402	3.519	3.13	100	4.00	4.98
Bluetooth 2	2402	3.515	4.12	100	4.00	5.97

Frequency (MHz)	Option	Min. Distance (cm)	Max. Power (dBm) (mW)		Exposure Limit (mW)	Ratio	Result
			(dBm)	(mW)			
2412	C	20.00	19.98	99.54	768.00	0.13	Pass
2402	C	20.00	4.98	3.15	768.00	0.01	Pass
2402	C	20.00	5.97	3.95	768.00	0.01	Pass

Note: 1. Time-Averaged Power=Output Power * Duty Cycle; ERP= Time-Averaged Power+ Antenna gain-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
Wi-Fi+ Bluetooth 2	0.13	0.01	0.14	1	Pass
Bluetooth 1+ Bluetooth 2	0.01	0.01	0.02	1	Pass

Note: Wi-Fi and Bluetooth 1 are used the same Antenna, not support simultaneous transmission.

Result: Pass