

RF Exposure statement

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To whom it may concern:

TÜV SÜD Zacta is authorized as an agency from **Applicant: Seiko Instruments Inc.** (**FCC ID: C4ZAB000005, IC: 4445A-AB000005**) to act on their behalf in all matters relating to applications for equipment authorization, including testing the device and the signing of all documents relating to these matters.

MAXIMUM PERMISSIBLE EXPOSURE

FCC RULES

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
(A) Limits for Occupational/Controlled 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
300–1500	f/300	6
1500–100,000	5	6
(B) 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 ²)	30

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)—Continued

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)
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

NOTE 1 TO TABLE 1: Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or can not exercise control over their exposure.

IC RULES

IC RSS-102 Issue 5, Section 4 Exposure Limits, For the purpose of this standard, Industry Canada has adopted the SAR and RF field strength limits established in Health Canada's RF exposure guideline, Safety Code 6.

Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m ²)	Reference Period (minutes)
0.003-10 ²¹	83	90	-	Instantaneous*
0.1-10	-	0.73/ $f^{0.5}$	-	6**
1.1-10	87/ $f^{0.5}$	-	-	6**
10-20	27.46	0.0728	2	6
20-48	58.07/ $f^{0.25}$	0.1540/ $f^{0.25}$	8.944/ $f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	3.142 $f^{0.3417}$	0.008335 $f^{0.3417}$	0.02619 $f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	616000/ $f^{1.2}$
150000-300000	0.158 $f^{0.5}$	4.21 x 10 ⁻⁴ $f^{0.5}$	6.67 x 10 ⁻⁵ f	616000/ $f^{1.2}$

Note: f is frequency in MHz.

*Based on nerve stimulation (NS).

** Based on specific absorption rate (SAR).

CALCULATIONS

Given

$$E = \sqrt{(30 * P * G) / d}$$

and

$$S = E^2 / 3770$$

where

E = Field Strength in Volts/meter

P = Power in Watts

G = Numeric antenna gain

d = Distance in meters

S = Power Density in milliwatts/square centimeter

Combining equations, rearranging the terms to express the distance as a function of the remaining variables, changing to units of Power to mW and Distance to cm, and substituting the logarithmic form of power and gain yields:

$$d = 0.282 * 10^{((P + G) / 20) / \sqrt{S}}$$

where

d = MPE distance in cm

P = Power in dBm

G = Antenna Gain in dBi

S = Power Density Limit in mW/cm²

Rearranging terms to calculate the power density at a specific distance yields

$$S = 0.0795 * 10^{((P + G) / 10) / (d^2)}$$

The power density in units of mW/cm² is converted to units of W/m² by multiplying by a factor of 10.

LIMITS

From FCC §1.1310 Table 1 (B), the maximum value of S = 1.0 mW/cm²

From IC RSS-102 Issue 5, Section 4 Table 4, S:

$$S = 0.02619f^{0.6834} = 0.02619 \cdot 2400^{0.6834} = 5.35 \text{ W /m}^2$$

$$S = 0.02619f^{0.6834} = 0.02619 \cdot 5180^{0.6834} = 8.95 \text{ W /m}^2$$

RESULTS

(MPE distance equals 20 cm)

Mode	Band	MPE Distance (cm)	Output Power (dBm)	Antenna Gain (dBi)	FCC Power Density (mW/cm ²)	IC Power Density (W/m ²)
802.11b	2.4GHz	20.0	15.76	0.4	0.00821	0.08209
802.11g	2.4GHz	20.0	12.35	0.4	0.00374	0.03744
802.11n HT20	2.4GHz	20.0	12.08	0.4	0.00352	0.03518
802.11a	5GHz	20.0	16.77	2.6	0.01719	0.17191
802.11n HT20	5GHz	20.0	16.75	1.9	0.01456	0.14565

NOTE: For mobile or fixed location transmitters, the minimum separation distance is 20 cm, even if calculations indicate that the MPE distance would be less.