ACLARA Technologies LLC 30400 Solon Road . Solon, OH 44139 440-528-7200

Apr 12th 2012

LLB11009X3 RF Exposure calculations Based on FCC 1.1307 & 2.1091, FCC OET Bulletin 65.

- (1) Categorically Exclusion from RF exposure Evaluation: According to FCC regulations, RF exposure evaluation is Categorically Excluded if transmitter's operation frequency is less than 1.5 GHz and ERP is less than 1.5 watt.
- (2) Absolute Maximum specifications of LLB11009X3 transmitter
- Operational frequency band 450 MHz to 470 MHz.
- The LLB11009X3 transmitter is measured for Max RF Power = 0.891 W.
- Absolute Maximum transmission time (duration) for any ACLARA transmitters does not exceed 100 mS (0.10second).
- Transmission period Absolute maximum is 4 transmissions per hour.
- All Aclara Transmitters utilize FSK modulation.
- (3) Average RF Power Calculation:

FCC regulations on permissible RF exposure are not based on peak envelope power (PEP), but on average power (P_ave) over a 30-minute time period for uncontrolled environments. As mentioned in (2), during any 30 minute Hexagram MTU can transmit only two times. Duration = 0.10 second. With maximum RF radiation equal to .891 W, the Average RF Power over 30 minutes is: P_ave (worst case) at 30 minute = .891 W*2* [0.10sec/((30*60)sec)] = 0.099mW

- (4) Maximum Radiated Power Density prediction (S): To predict power density (S) at distance R=20 cm from transmitter with P_ave = 0.099mW, next formula is used: $S = P_ave/(4*(PI)*R^2)$ For the worst of the worst worst-case prediction of power density at or near a transmitter surface let's use: $S = P_ave/((PI)*R^2) = 0.099$ mW/(4*3.14*20cm*20cm) = 19.7 uW/cm*20. This is the worst case of the near field power density of LLB11009X3 transmitter.
- (5) Maximum Permissible Exposure (MPE) from LLB11009X3: AS FCC require, the maximum permissible exposure for general public in "uncontrolled situation" at 20 cm is: MPE = 460MHz/1500 = 0.440 mW/cm^2. By comparing results in (4) and (5), S=19.7 uW/cm^2 < MPE=0.440 mW/cm^2. We see that LLB11009X3 fully complies with RF safety at a distance of 20 cm.

Sincerely,

Larry Murphy
Executive Director of Engineering
440-528-7200
Lmurphy@aclara.com