



Maximum Permissible Exposure Evaluation
for
Comtech Mobile Datacom Corporation
MTM-203

FCC ID: UQR-CTMDCMTM203

November 8, 2006

WLL PROJECT #: 9330

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Maximum Permissible Exposure Test Report

for

FCC ID: UQR-CTMDCMTM203

1.0 Introduction

This report has been prepared on behalf of Comtech Mobile Datacom Corporation MTM-203 transmitter to show compliance with the RF exposure requirements as defined in FCC §1.1307.

1.1 Requirements

Three different categories of transmitters are defined by the FCC in OET Bulletin 65. These categories are fixed installation, mobile, and portable and are defined as follows:

- **Fixed Installations:** fixed location means that the device, including its antenna, is physically secured at a permanent location and is not able to be easily moved to another location. Additionally, distance to humans from the antenna is maintained to at least 2 meters.
- **Mobile Devices:** a mobile device is defined as a transmitting device designed to be used in other than fixed locations and to be generally used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's radiating structures and the body of the user or nearby persons. Transmitters designed to be used by consumers or workers that can be easily re-located, such as a wireless modem operating in a laptop computer, are considered mobile devices if they meet the 20 centimeter separation requirement. The FCC rules for evaluating mobile devices for RF compliance are found in 47 CFR §2.1091.
- **Portable Devices:** a portable device is defined as a transmitting device designed to be used so that the radiating structure(s) of the device is/are within 20 centimeters of the body of the user. Portable device requirements are found in Section 2.1093 of the FCC's Rules (47 CFR§2.1093).

The FCC also categorizes the use of the device as based upon the user's awareness and ability to exercise control over his or her exposure. The two categories defined are Occupational/ Controlled Exposure and General Population/Uncontrolled Exposure. These two categories are defined as follows:

- **Occupational/Controlled Exposure:** In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means. Awareness of the potential for RF exposure in a workplace or similar environment can be provided through specific training as part of a RF safety program. If appropriate, warning signs and labels can also be used to establish such awareness by providing prominent information on the risk of potential exposure and instructions on methods to minimize such exposure risks.
- **General Population/Uncontrolled Exposure:** The general population / uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity. Warning labels placed on low-power consumer devices such as cellular telephones are not considered sufficient to allow the device to be considered under the occupational/controlled category, and the general population/uncontrolled exposure limits apply to these devices.

The Comtech Mobile Datacom Corporation MTM-203 is evaluated to the General Population/Uncontrolled Exposure limits. Evaluation is done as a mobile device. The MTM-203 is not to be body worn or have no intent of body worn accessories.

1.2 Radio Frequency Radiation Exposure Evaluation

The MPE shall be calculated to show compliance with the power density limit for each radio and frequency individually at the minimum mounting distance. The total percentage of allowable RF Exposure will be calculated for each radio and then added to ensure the overall percentage does not exceed 100%. The following formula was used to calculate the Power Density from each radio:

$$S = \frac{PG}{4\pi R^2}$$

Where:

S = Power Density

P = Output Power at the Antenna Terminals

G = Gain of Transmit Antenna (linear gain)

R = Distance from Transmitting Antenna

Transmitter Data:

Transmitter Frequency	Power Output dBm	Maximum Antenna Gain dB
1626.5 – 1660.5 MHz	33.99	5

The following table is the RF exposure calculation for the MTM-203.

MTM-203 Radio:

Frequency	1626.5	MHz		
Limit	1.000	mW/cm ²		
Distance (cm), R =	20	cm		
Power (dBm), P =	33.99	dBm	2506.11	mW
TX Ant Gain (dB), G =	5	dB		
Power Density (S) =	1.5766	mW/cm ²	(at 20cm)	
Minimum Distance =	25.1	cm		

The calculations above are at a 100% duty cycle which would require a minimum separation distance of 25.1cm. However, the MTM-203 transmits at a maximum rate of 380 mSec on and 8 seconds off.. Therefore the actual power is calculated as follows:

MTM-203 transmitter power was reduced from 33.99dBm to 20.59dBm based on a 4.5% on-time duty cycle over a 30 minute averaging period.

Frequency	1626.5	MHz		
Limit	1.000	mW/cm ²		
Distance (cm), R =	20	cm		
Power (dBm), P =	20.59	dBm	114.55	mW
TX Ant Gain (dB), G =	5	dB		
Power Density (S) =	0.072	mW/cm ²	(at 20cm)	
Minimum Distance =	5.4	cm		

From the table above the MTM-203 meets the MPE limits at the 20cm separation distance for a mobile device.