

5 FCC §2.1091, FCC §15.407(i) & ISEDC RSS-102 – RF Exposure

5.1 Applicable Standard

As per FCC §1.1310(d) (3), At operating frequencies above 6 GHz, the MPE limits listed in Table 1 in paragraph (e)(1) of this section shall be used in all cases to evaluate the environmental impact of human exposure to RF radiation as specified in §1.1307(b) of this part.

TABLE 1 TO §1.1310(E)(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)
(i) Limits for Occupational/Controlled Exposure				
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
300-1,500			f/300	<6
1,500-100,000			5	<6
(ii) 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
30-300	27.5	0.073	0.2	<30
300-1,500			f/1500	<30
1,500-100,000			1.0	<30

f = frequency in MHz. * = Plane-wave equivalent power density.

According to ISSED RSS-102 Issue 5:

2.5.2 Exemption Limits for Routine Evaluation — RF Exposure Evaluation

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz Footnote6 and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = \text{EIRP}/4\pi R^2$$

Where: S = power density

EIRP = Effective Isotropic Radiated Power

R = distance to the center of radiation of the antenna

5.3 MPE Result for FCC

Note: The Maximum power measurements were referenced from the test report: R2108A0712-M1 by TA Technology (Shanghai) Co., LTD, issued on 2021-09-07.

Note: 2.4GHz and 5 GHz Wi-Fi simultaneous transmission cannot be enabled by this device.

Band	Antenna Gain (dBi)	Maximum Power (dBm)	Maximum EIRP (dBm)	Maximum EIRP (mW)	Power Density at 20cm (mW/cm ²)	Limit (mW/cm ²)
5 GHz Wi-Fi	4.58	17	21.58	143.88	0.029	1.0

For this device, a separation distance of 20 cm complies with the Simultaneous transmission limit of ≤ 1.0 .

Worst Case Sum of Ratios:

BT + 5GHz Wi-Fi: $0.011/1.0 + 0.029/1.0 = 0.04 < 1$

5.4 IC Exemption

5 GHz W-Fi:

The EIRP of this device is 21.58 dBm (143.88 mW) which is less than the exemption threshold, i.e., $1.31 \times 10^{-2} \times f^{(0.6834)} = 4.90\text{W}$. Therefore, the RF exposure evaluation is exempt.

Worst Case Sum of Ratios:

BT + 5 GHz Wi-Fi: $0.0542/2.71 + 0.14388/4.9 = 0.049 < 1$