RF Exposure Evaluation Declaration

FCC ID	: 2AXJ4AX72PRO
Applicant	: TP-Link Technologies Co., Ltd.
Application Type	: Certification
Product	: AX5400 Multi-Gigabit Wi-Fi 6 Router
Model No.	: Archer AX72 Pro, EX710 Pro
Brand Name	: tp-link
FCC Classification	: Digital Transmission System (DTS) Unlicensed National Information Infrastructure (NII)
FCC Rule Part(s)	: FCC Part 2.1091
Result	: Complies

Test By : Owen Tsai
(Owen Tsai)

Reviewed By : Paddy Chen
(Paddy Chen)

Approved By : Chenz Ker
(Chenz Ker)

Testing Laboratory
3261

The test results relate only to the samples tested.

The test results shown in the test report are traceable to the national/international standards through the calibration of the equipment and evaluated measurement uncertainty herein.

Revision History

Report No.	Version	Description	Issue Date	Note
2208TW0121-U4	1.0	Original Report	2022-11-15	Valid

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1. General Information

Applicant	TP-Link Corporation Limited
Applicant Address	Room 901, 9/F., New East Ocean Centre, 9 Science Museum Road, Tsim Sha Tsui, Kowloon, Hongkong
Manufacturer	TP-Link Corporation Limited
Manufacturer Address	Room 901, 9/F., New East Ocean Centre, 9 Science Museum Road, Tsim Sha Tsui, Kowloon, Hongkong
Test Site	MRT Technology (Taiwan) Co., Ltd
Test Site Address	No. 38, Fuxing Second Rd., Guishan Dist., Taoyuan City 333, Taiwan (R.O.C)
MRT FCC Registration No.	291082
Test Device Serial No.	N/A ☐ Production ☒ Pre-Production ☐ Engineering

Test Facility / Accreditations

1. MRT facility is a FCC registered (Reg. No. 291082) test facility with the site description report on file and is designated by the FCC as an Accredited Test Firm.
2. MRT facility is an IC registered (MRT Reg. No. 21723) test laboratory with the site description on file at Industry Canada.
3. MRT Lab is accredited to ISO 17025 by the Taiwan Accreditation Foundation (TAF Cert. No. 3261) in EMC, Telecommunications and Radio testing for FCC (Designation Number: TW3261), Industry Taiwan, EU and TELEC Rules.

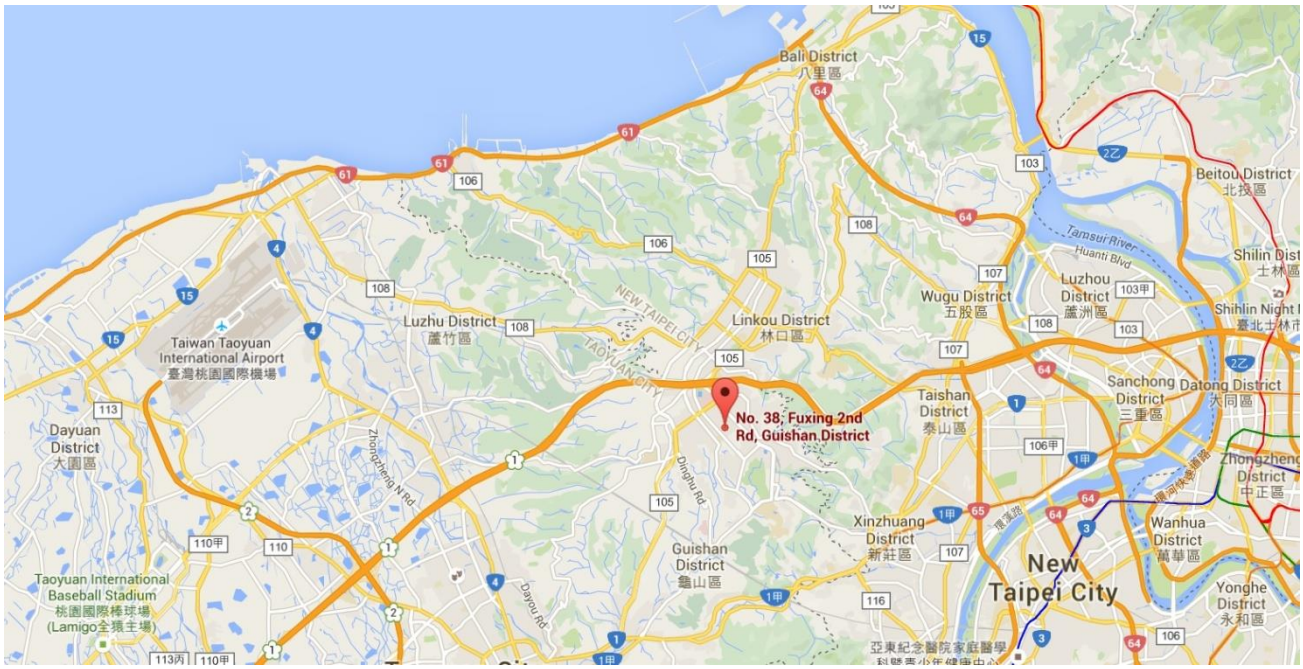
2. INTRODUCTION

2.1. Scope

Measurement and determination of electromagnetic emissions (EMC) of radio frequency devices including intentional and/or unintentional radiators for compliance with the technical rules and regulations of the Federal Communications Commission and the Innovation, Science and Economic Development Canada and Certification and Engineering Bureau.

2.2. MRT Test Location

The map below shows the location of the MRT LABORATORY, its proximity to the Taoyuan City. These measurement tests were conducted at the MRT Technology (Taiwan) Co., Ltd. Facility located at No.38, Fuxing 2nd Rd., Guishan Dist., Taoyuan City 33377, Taiwan (R.O.C).



3. PRODUCT INFORMATION

3.1. Feature of Equipment under Test

Product Name:	AX5400 Multi-Gigabit Wi-Fi 6 Router
Model No.:	Archer AX72 Pro, EX710 Pro
Brand Name:	tp-link
Wi-Fi Specification:	802.11a/b/g/n/ac/ax
Accessory	
Adapter	BRAND: MASS POWER MODEL: NBS30D120250VU INPUT: 100 - 240V ~ 50/60Hz 0.8A OUTPUT: DC 12.0V 2.5A
Note: Hardware design and PCB layout are the same between the two models, only the model for our marketing strategy is different.	

3.2. Description of Available Antennas

Antenna Type	Frequency Band (MHz)	T_X Paths	Max Antenna Gain (dBi)	Beamforming Directional Gain (dBi)	CDD Directional Gain (dBi)	
					For Power	For PSD
Dipole Antenna	2412 ~ 2462	2	2.00	5.01	2.00	5.01
	5150 ~ 5250	4	1.91	7.93	1.91	7.93
	5250 ~ 5350	4	2.27	8.29	2.27	8.29
	5470 ~ 5725	4	2.50	8.52	2.50	8.52
	5725 ~ 5850	4	2.50	8.52	2.50	8.52

Remark:

1. The EUT supports Cyclic Delay Diversity (CDD) mode, and CDD signals are correlated.

   If all antennas have the same gain, G_{ANT}, Directional gain = G_{ANT} + Array Gain, where Array Gain is as follows.

   - For power spectral density (PSD) measurements on all devices,

   Array Gain = 10 log (N_{ANT}/ N_{SS}) dB;

   - For power measurements on IEEE 802.11 devices,

   Array Gain = 0 dB for $N_{ANT} \leq 4$;

2. The EUT also supports Beam Forming mode, and the Beam Forming support 802.11ac/ax, not

include 802.11a/b/g/n. BF Directional gain = G_{ANT} + 10 log (N_{ANT}).

3. The Messages as above is from the antenna specifications.

Test Mode	T_X Paths	CDD Mode	Beamforming Mode
802.11b/g/n	2	√	X
802.11ax	2	√	√
802.11a/n(NII)	4	√	X
802.11ac/ax (NII)	4	√	√

4. .

3.3. Applied Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 2.1091 & KDB 447498 D04 Interim General RF Exposure Guidance v01

4. RF Exposure Evaluation

4.1. Limits

According to FCC §1.1310: The criteria listed in the following table shall be used to evaluate the environment impact of human exposure to radio frequency (RF) radiation as specified in §1.1307(b)

Limits For Maximum Permissible Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm^2)	Average Time (Minutes)
(A) Limits for Occupational/ Control 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
300-1,500	--	--	f/300	<6
1,500-100,000	--	--	5	<6
(B) Limits for General Population/ Uncontrolled Exposures				
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.

4.2. MPE Exemptions

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph §1.1307(b)(2) of this section): A single RF source is exempt if:

(Option A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph §1.1307(b)(3)(ii)(A) of this section.
Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(ii)(A);

(Option B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P (mW) described in the following formula. This method shall only be used at separation distances (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive). P is given by:

$P\,th(mW) = \{ERP_{20cm}(d\ /\ 20cm)^x$ d ≤ 20cm

$P\,th(mW) = \{ERP_{20cm}$ 20cm < d ≤ 40cm

Where

$x = -log_{10}\left(\frac{60}{ERP_{20cm}\sqrt{f}}\right)$ and f is in GHz;

and

$ERP_{20cm}(mW) = \{2040f$ 0.3GHz ≤ f < 1.5GHz

$ERP_{20cm}(mW) = \{3060$ 1.5GHz ≤ f ≤ 6GHz

(Option C) Or using Table 1 and 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. For the exemption in Table 1 to apply, R must be at least λ/2π, where λ is the free-space operating wavelength in meters. If the ERP of a single RF source is not easily obtained, then the available maximum time-averaged power may be used in lieu of ERP if the physical dimensions of the radiating structure(s) do not exceed the electrical length of λ/4 or if the antenna gain is less than that of a half-wave dipole (1.64 linear value).

Table 1 to §1.1307(b)(3)(i)(C) - Single RF Sources Subject to Routine Environmental Evaluation

RF Source Frequency (MHz)	Threshold ERP (watts)
0.3-1.34	$1920R^2$
1.34-30	$3450R^2/f^2$
30-300	$3.83R^2$
300-1,500	$0.0128R^2/f$
1,500-100,000	$19.2R^2$

For multiple RF sources: Multiple RF sources are exempt if:

(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). This exemption may not be used in conjunction with other exemption criteria other than those is paragraph §1.1307(b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph §1.1307(b)(3)(i)(A).

(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.

$$\sum_{i=1}^{a} \frac{P_i}{P_{th,i}} + \sum_{j=1}^{b} \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^{c} \frac{Evaluated_k}{Exposure\ Limit_k} \leq 1$$

Where:

a = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(B) of this section for P_{th}, including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph §1.1307(b)(3)(i)(C) of this section for Threshold ERP, including existing exempt transmitters and those being added.

c = number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance including existing evaluated transmitters.

P_i = the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile,

or portable RF source *i* at a distance between 0.5 cm and 40 cm (inclusive).

$\boldsymbol{P_{th,i}}$ = the exemption threshold power (P_{th}) according to paragraph §1.1307(b)(3)(i)(B) of this section for fixed, mobile, or portable RF source *i*.

$\boldsymbol{ERP_j}$ = the ERP of fixed, mobile, or portable RF source *j*.

$\boldsymbol{ERP_{th,j}}$ = exemption threshold ERP for fixed, mobile, or portable RF source *j*, at a distance of at least λ/2π according to the applicable formula of paragraph §1.1307(b)(3)(i)(C) of this section.

$\boldsymbol{Evaluated_k}$ = the maximum reported SAR or MPE of fixed, mobile, or portable RF source *k* either in the device or at the transmitter site from an existing evaluation at the location of exposure.

$\boldsymbol{Exposure\ Limit_k}$ = either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable RF source *k*, as applicable from §1.1310 of this chapter.

4.3. Calculated Result

Product Name:	AX5400 Multi-Gigabit Wi-Fi 6 Router
Test Item	RF Exposure Evaluation

Test Mode	Frequency Band (MHz)	Conducted Power (dBm)	Tune-up Power (dBm)	Antenna Gain (dBi)	Tune-up EIRP (dBm)
802.11b/g/n/ax	2412 ~ 2462	29.71	29.80	5.01	34.81
802.11a/n/ac/ax	5180 ~ 5240 5260 ~ 5320 5500 ~ 5720 5745 ~ 5825	27.38	27.40	8.52	35.92

Note: Tune-up power was declared by manufacturer.

For single RF source, Option C

Test Mode	λ / 2 π (m)	R (m)	Turn-up ERP (mW)	Threshold ERP (mW)	Power Density (mW/cm^2)	Limit (mW/cm^2)
Wi-Fi (DTS)	0.0198	0.47	1845.0	4241.28	0.1090	< 1
Wi-Fi (NII)	0.0092	0.47	2382.3	4241.28	0.1408	< 1

Note: R is from user manual.

For multiple RF sources

The EUT supports Wi-Fi 2.4GHz + Wi-Fi 5GHz (NII) simultaneous transmissions.

So the Max Simultaneous Transmission = 1845.0/4241.28 (DTS) + 2382.3/4241.28 (NII) = 0.9967 < 1

Therefore, the device qualifies for RF exposure test exemption.

The End

Appendix A : External Photograph

Refer to “2208TW0121-External Photo” file.

Appendix B : Internal Photograph

Refer to “2208TW0121-Internal Photo” file.