

5 FCC §2.1091, §15.247(i) & ISED RSS-102 - RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
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
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

According to ISED 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

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

5.3 MPE Results

BLE Standalone

Maximum peak output power at antenna input terminal (dBm): 4.89

Maximum peak output power at antenna input terminal (mW): 3.08

Prediction distance (cm): 20

Prediction frequency (MHz): 2402

Maximum Antenna Gain, typical (dBi): 2.47

Maximum Antenna Gain (numeric): 1.77

Power density of prediction frequency at 20.0 cm (mW/cm²): 0.0011

FCC MPE limit for uncontrolled exposure at prediction frequency
(mW/cm²): 1.0

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0011 mW/cm². Limit is 1.0 mW/cm².

Worst Case Co-location MPE Calculation:

Radio	Max EIRP (dBm)	Evaluated Distance (cm)	Worst-Case Exposure Level	Limit	Worst-Case Ratios	Sum of Ratios	Limit
Worst Case							
BLE	7.36	20	0.0011 mW/cm ²	1.0 mW/cm ²	0.11%	0.11%	100%
UWB	-41.4883	20	0.000000141 mW/cm ²	1.0 mW/cm ²	0.00000141%		
NFC*	-15.607	20	0.00000547 mW/cm ²	0.979 mW/cm ²	0.00000559%		

Note*: NFC is ERP

5.4 MPE Prediction

BLE

Maximum EIRP power = 4.89 dBm + 2.47 dBi = 7.36 dBm which is lesser than $1.31 \times 10^{-2} f^{0.6834} = 2.6764 \text{ W} = 34.276 \text{ dBm}$.

Therefore, the RF exposure Evaluation is exempt.