

FCC §15.247 (i) & §1.1307 (b) (3) & §2.1091- MPE-BASED EXEMPTION

Applicable Standard

According to subpart 15.247 (i) and subpart 2.1091 systems operating under the provisions of this section shall be operated in a manner that ensures the public is not exposed to RF energy level in excess of the communication guidelines.

According to KDB 447498 D04 Interim General RF Exposure Guidance

MPE-Based Exemption:

An alternative to the SAR-based exemption is provided in § 1.1307(b)(3)(i)(C), for a much wider frequency range, from 300 kHz to 100 GHz, applicable for separation distances greater or equal to $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. The MPE-based test exemption condition is in terms of ERP, defined as the product of the maximum antenna gain and the delivered maximum time-averaged power. For this case, a RF source is an RF exempt device if its ERP (watts) is no more than a frequency-dependent value, as detailed tabular form in Appendix B. These limits have been derived based on the basic specifications on Maximum Permissible Exposure (MPE) considered for the FCC rules in § 1.1310(e)(1).

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	$1,920 R^2$.
1.34-30	$3,450 R^2/f^2$.
30-300	$3.83 R^2$.
300-1,500	$0.0128 R^2 f$.
1,500-100,000	$19.2 R^2$.

R = minimum separation distance from the body of a nearby person (appropriate units, e.g., m);
f = frequency in MHz

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

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:

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

Result

Mode	Frequency (MHz)	Tune up conducted power [#] (dBm)	Antenna Gain [#]		ERP		Evaluation Distance (m)	ERP Limit (W)
			(dBi)	(dBd)	(dBm)	(W)		
Bluetooth	2402-2480	5	-0.58	-2.73	2.27	0.002	0.2	0.768
BLE	2402-2480	3.5	-0.58	-2.73	0.77	0.001	0.2	0.768

Note: The tune up conducted power and antenna gain was declared by the applicant.

To maintain compliance with the FCC's RF exposure guidelines, place the equipment at least 20cm from nearby persons.

Result: Compliant.