

Test report No:  
 NIE: 75691RAN.006A3

## Assessment report

### RF EXPOSURE REPORT ACCORDING TO FCC 47 CFR Part 2.1091; FCC 47 CFR Part 1.1307 FCC 47 CFR Part 1.1310

(*) Identification of item under evaluation	SCG2228
(*) Trademark	Sepura
(*) Model and /or type reference	SCG2228
(*) Other identification of the product	HW version: PLX-85015500 SW Version: 1807 020 10138 FCC ID: XX6SCG2228X IC ID: 8739A-SCG2228X
(*) Features	TETRA ( 806-870MHz ) , GNSS
(*) Manufacturer	Sepura Limited 9000 Cambridge Research Park, Beach Drive, Waterbeach, Cambridge, CB25 9TL, UK
Test method requested, standard	FCC 47 CFR Part 2.1091 Radiofrequency radiation exposure evaluation: mobile devices. FCC 47 CFR Part 1.1307: Actions that may have a significant environmental effect, for which Environmental Assessments (EAs) must be prepared. FCC 47 CFR Part 1.1310: Radiofrequency radiation exposure limits.
Summary	IN COMPLIANCE
Approved by (name / position & signature)	Manuel Garcia Antennas Lab Technical Responsible
Date of issue	2025-04-01
Report template No	FAN36_02 (*) "Data provided by the client"

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## Data provided by the client

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The following data has been provided by the client:

1. Information relating to the description of the sample ("Identification of the item under evaluation", "Trademark", "Model and/or type reference", "General description of the device", "Other identification of the product").
2. Maximum output power, maximum antenna gain and use distance information.
3. The device under evaluation consists of a TETRA Mobile radio working in frequency range 806-870MHz with GNSS.

DEKRA Testing and Certification, S.A.U. declines any responsibility with respect to the information provided by the client and that may affect the validity of results.

## Identification of the client

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## Document history

Report number	Date	Description
75691RAN.006	2024-07-23	First release
75691RAN.006A1	2025-01-20	Second release. FCC ID on main page, TETRA maximum output power and controlled use distance have been updated. This test report cancels and replaces test report 75691RAN.001.
75691RAN.006A2	2025-03-05	Third release. Evaluation distance paragraph has been updated. This test report cancels and replaces test report 75691RAN.006A1.
75691RAN.006A3	2025-04-01	Fourth release. Evaluation distance paragraph has been updated. This test report cancels and replaces test report 75691RAN.006A2.

## Appendix A: FCC RF Exposure assessment result

## General description of the device under evaluation

Table 1 shows information used for the RF Evaluation, taking into account the following declared specifications for the device:

**Description and technologies:** the device under evaluation consists of a TETRA Mobile radio working in frequency range 806-870MHz with GNSS. with the following features: TETRA (806-870MHz), GNSS. For RF Exposure evaluation, only transmission technologies: TETRA (806-870MHz) are taken into account.

**Evaluation Distance:** according to the manufacturer, during its normal use, the separation distance between the radiating structures of the device and nearby users will be greater than 1 m for workers (controlled use devices) and for general users. In order to perform the assessment a conservative evaluation distance of 35 cm and 91 cm have been used respectively.

### Maximum output power:

- Values corresponding to maximum output power have been declared by the device manufacturer (maximum output power values stated in module manufacturer's datasheet).

**Antennas:** the device supports one antenna for the TETRA (806-870MHz) transmitting technology:

- Values corresponding to antenna gain have been declared by the device manufacturer (maximum peak gain stated in antenna manufacturer's datasheet).

The following table shows the information provided above:

Technology / Mode	Operating Band	Frequency under evaluation (MHz)	Maximum Conducted Output Power (Incl. Tune-Up) (dBm)	Antenna peak gain (dBi)	Maximum E.R.P. (dBm)	Maximum E.R.P. (mW)	Maximum E.I.R.P. (dBm)	Maximum E.I.R.P. (mW)
TETRA	806-870 MHz	806 - 870	41.00	5.00	43.85	24266.10	46.00	39810.72

Table 1: Equipment specifications

## Evaluation Results

### RF Exposure Exemption evaluation:

Technology / Mode	Operating Band	Frequency under evaluation (MHz)	Distance (cm)	Maximum Conducted Power (mW)	Maximum E.R.P. (mW)	§ 1.1307(b)(3).i.(B) Exposure Limit (mW)	Verdict for exemption § 1.1307(b)(3).i
TETRA	806-870 MHz	806 - 870	35.00	N/A	24266.10	1644.24	MPE required

Table 2: FCC Exemption Evaluation Results for Controlled use Distance

Technology / Mode	Operating Band	Frequency under evaluation (MHz)	Distance (cm)	Maximum E.R.P. (mW)	§ 1.1307(b)(3).i.(C) Exposure Limit (mW)	Verdict for exemption § 1.1307(b)(3).i
TETRA	806-870 MHz	806 - 870	91.00	24266.10	N/A	MPE required

Table 3: FCC Exemption Evaluation Results for General Public use Distance

The device fails to comply with applicable §1.1307(b)(3).i. exemption limits, so Maximum Permissible Exposure (MPE) evaluation is necessary to demonstrate compliance.

**RF Exposure MPE evaluation:**

Technology / Mode	Operating Band	Frequency under evaluation (MHz)	Distance (cm)	Power density (mW/cm <sup>2</sup> )	FCC Occupational Exposure Limit (mW/cm <sup>2</sup> )	Verdict
TETRA	806-870 MHz	806 - 870	35.00	2.59	2.69	<b>Pass</b>

**Table 4:** FCC Evaluation Results for Controlled use Distance

Technology / Mode	Operating Band	Frequency under evaluation (MHz)	Distance (cm)	Power density (mW/cm <sup>2</sup> )	FCC General Population Limit (mW/cm <sup>2</sup> )	Verdict
TETRA	806-870 MHz	806 - 870	91.00	0.38	0.54	<b>Pass</b>

**Table 5:** FCC Evaluation Results for General Public use Distance

The computed value(s) are below the limit(s), so these modes meet the requirements stated in FCC 47 CFR Part 1.1310.

## Appendix B: FCC RF Exposure information

## RF Exposure determination of exemption

According to FCC 47 CFR §1.1307 (b)(3) Determination of exemption:

(i) For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2), a single RF source is exempt if:

(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 (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

(B) Or the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (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).  $P_{th}$  is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

Where

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

and

$$ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

$d$  = the separation distance (cm);

(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  $\lambda/2\pi$ , where  $\lambda$  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  $\lambda/4$  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	$1,920 R^2$ .
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	$19.2 R^2$ .

(ii) 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 in paragraph (b)(3)(i)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (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 (b)(3)(i)(B) of this section for P<sub>th</sub>, including existing exempt transmitters and those being added.

b = number of fixed, mobile, or portable RF sources claiming exemption using paragraph (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<sub>i</sub> = 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).

P<sub>th,i</sub> = the exemption threshold power (P<sub>th</sub>) according to paragraph (b)(3)(i)(B) of this section for fixed, mobile, or portable RF source i.

ERP<sub>j</sub> = the ERP of fixed, mobile, or portable RF source j.

ERP<sub>th,j</sub> = 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 (b)(3)(i)(C) of this section.

Evaluated<sub>k</sub> = 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.

Exposure Limit<sub>k</sub> = 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.

The available maximum time-averaged power or effective radiated power (ERP), can be calculated using the following formula to assess compliance with the Exemption Limits:

$$P_{E.I.R.P.} = P_T + G_T - L_C$$

Where:

P<sub>T</sub> = transmitter time-averaged output power (including Duty Cycle and tune-up tolerance, if applicable)

G<sub>T</sub> = gain of the transmitting antenna

L<sub>C</sub> = signal attenuation in the connecting cable between the transmitter and the antenna if applicable

$$P_{E.R.P.} = P_{E.I.R.P.} - 2.15 \text{ dB}$$

## RF Exposure evaluation

Limits for Maximum Permissible Exposure (MPE) for RF sources are defined in FCC 47 CFR “§1.1310 Radiation Exposure limits, paragraph (e)”:

**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 <sup>2</sup> )	Averaging time (minutes)
<b>(i) Limits for Occupational/Controlled Exposure</b>				
0.3-3.0	614	1.63	*(100)	≤6
3.0-30	1842/f	4.89/f	*(900/f <sup>2</sup> )	<6
30-300	61.4	0.163	1.0	<6
300-1,500			f/300	<6
1,500-100,000			5	<6
<b>(ii) Limits for General Population/Uncontrolled Exposure</b>				
0.3-1.34	614	1.63	*(100)	<30
1.34-30	824/f	2.19/f	*(180/f <sup>2</sup> )	<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.

Each supported transmission technology will be evaluated to determine if it is in compliance with limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields.

In order to perform the assessment, the following equations have been used for the calculations; these equations are accurate in the far-field of an antenna and will over-predict power density in the near field, where they could be used for making a "worst-case" or conservative prediction:

$$\text{Power density: } S[mW/cm^2] = \frac{P_{E.I.R.P.}[mW]}{4\pi R[cm]^2}$$

Where:

$S$  = power density

$P_{E.I.R.P.}$  = Equivalent isotropically radiated power

$R$  = distance to the center of radiation of the antenna (evaluation distance)

$$P_{E.I.R.P.} = P_T + G_T - L_C$$

Where:

$P_T$ = transmitter time-averaged output power (including Duty Cycle and tune-up tolerance, if applicable)

$G_T$ = gain of the transmitting antenna

$L_C$  = signal attenuation in the connecting cable between the transmitter and the antenna if applicable