

KDB 680106 explains when a PAG is required for WPT devices. The 6 conditions detailed in section 5 of that publication are addressed below.

Power transfer frequency is less than 1 MHz.	This device operates from 917.5MHz
Output power from each primary coil is less than or equal to 15 watts.	The total transmitted power is 40 dBm which is around 10W
The system may consist of more than one source primary coils, charging one or more clients. If more than one primary coil is present, the coil pairs may be powered on at the same time.	This device has a single antenna and supports charging of a single receiver.
Client device is placed directly in contact with the transmitter.	The client device can be charged through distance up to 1m.
Mobile exposure conditions only (portable exposure conditions are not covered by this exclusion).	The charger is designed for mobile use – it requires external power (via AC-DC adapter and USB-C interface). It does not include a battery and is not designed for portable use.
The aggregate H-field strengths anywhere at or beyond 15 cm surrounding the device, and 20 cm away from the surface from all coils that by design can simultaneously transmit, and while those coils are simultaneously energized, are demonstrated to be less than 50% of the MPE limit.	<p>As this device operates at 917.5MHz RF exposure is addressed using SAR measurement and not by measurement of E- and H- fields.</p> <p>SAR values measurements are made at 35cm in front the charger per KDB 258315. Actual test distances were 10cm from all sides, 5cm from the back. All measured values are significantly lower than 50% of the limit at the reduced distance.</p>