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## Maximum Permissible Exposure Study - Engineering Analysis

**IW9165DH-B  
IW9165DH-A**

Cisco Industrial Wireless Access Point

FCC ID: LDKIW9165DH  
IC: 2461A-IW9165DH

**2400-2483.5 MHz, 4.9GHz 5150-5250 MHz,**

**5250-5350 MHz, 5470-5725 MHz, 5725-5850 MHz**

Against the following Specifications:  
47 Code of Federal Regulations 2.1091  
RSS-102 Issue 5

**Cisco Systems**  
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This report replaces any previously entered test report under This test report has been electronically authorized and archived using the CISCO Doc Central. Test Report Template EDCS# 11556830.

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## Summary of Test Result

Report Clause	Ref Std. Clause	Test Items	Result (PASS/FAIL)	Remark
2	-	Exposure evaluation	PASS	-

### Declaration of Conformity:

1. The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers. It's means measurement values may risk exceeding the limit of regulation standards, if measurement uncertainty is include in test results.
2. The measurement uncertainty please refer to report "Measurement Uncertainty".

# 1 General Description

## 1.1 EUT General Information

RF General Information			
Evaluation Mode	Frequency Range (MHz)	Operating Frequency (MHz)	Modulation Type
5GHz WLAN	5150-5250 5250-5350 5470-5725 5725-5850	5180-5250 5250-5320 5500-5720 5745-5825	802.11a/n: OFDM (BPSK, QPSK, 16QAM, 64QAM) 802.11ac: OFDM (BPSK, QPSK, 16QAM, 64QAM, 256QAM) 802.11ax: OFDMA (BPSK, QPSK, 16QAM, 64QAM, 256QAM, 1024QAM)
4.9GHz WLAN	4940-4990	4945-4985	OFDM (BPSK, QPSK, 16QAM, 64QAM)
Bluetooth	2400-2483.5	2402-2480	LE: GFSK

## 1.2 Antenna Information

Product ID	Family	Description	Supported by IW9165DHD?	Supported by IW9165E?	Peak Gain 2.4 GHz (dBi)	Peak Gain 4.9 GHz (dBi)	Peak Gain 5 GHz (dBi)	Gain > 30° Elevation UNII-1 (dBi)	Peak Gain 6 GHz (dBi)	Gain > 30° Elevation UNII-5 & 7 (dBi)	5 GHz Fixed Point-to-Point?	5 GHz Point-to-Multipoint?
IW-ANT-OMM-53-N=	Legacy	5 GHz 3 dBi Omnidirectional Antenna, Multi-polarized, N Female Connector	No	Yes	N/A	3	3	0	N/A	N/A	No	Yes
AIR-ANT5180V-N=	Legacy	5 GHz 8 dBi Omnidirectional Colinear Array Antenna, N Male Connector	Yes	Yes	N/A	8	8	-3	N/A	N/A	No	Yes
IW-ANT-PNL-59-N=	Legacy	5 GHz 9 dBi 2-Element Patch Array Antenna, Slant ±45 Polarized, N Female Connectors	Yes	Yes	N/A	N/A	10	7	N/A	N/A	Yes	Yes
AIR-ANT5114P2M-N=	Legacy	5 GHz 13 dBi 2-Element Patch Array Antenna, N Male Connectors	Yes	Yes	N/A	N/A	13	4	N/A	N/A	Yes	Yes
AIR-ANT5114P2M-NS=	SIA	5 GHz 14 dBi 2-Element Shark Antenna, Slant ±45 Polarized, QMA Female Connectors	Yes	Yes	N/A	N/A	13	3	N/A	N/A	Yes	Yes
IW-ANT-SKD-513-Q=	Legacy	5 GHz 14 dBi 2-Element Shark Antenna, Slant ±45 Polarized, QMA Female Connectors	No	Yes	N/A	13	13	8	N/A	N/A	No	Yes
IW-ANT-SKS-514-Q=	Legacy	5.4 GHz 14 dBi 2-Element Shark Antenna, Slant ±45 Polarized, QMA Female Connectors	No	Yes	N/A	13	13	8	N/A	N/A	No	Yes
AIR-ANT2547V-N=	Legacy	2.4 GHz 4 dBi / 5 GHz 7 dBi Omnidirectional Colinear Array Antenna, N male connector	Yes	Yes	4	N/A	7	-3	N/A	N/A	No	Yes
AIR-ANT2547VG-N=	Legacy	2.4 GHz 4 dBi / 5 GHz 7 dBi Omnidirectional Colinear Array	Yes	Yes	4	N/A	7	-3	N/A	N/A	No	Yes
AIR-ANT2547VG-NS=	SIA	Omnidirectional Colinear Array	Yes	Yes	4	N/A	7	-3	N/A	N/A	No	Yes
AIR-ANT2568VG-N=	Legacy	2.4 GHz 6 dBi / 5 GHz 8 dBi Omnidirectional Antenna, N Male	Yes	Yes	6	N/A	8	3	N/A	N/A	No	Yes
AIR-ANT2568VG-NS=	SIA	Omnidirectional Antenna, N Male	Yes	Yes	6	N/A	8	3	N/A	N/A	No	Yes
AIR-ANT2588P4M-NS=	SIA	2.4 GHz 8 dBi / 5 GHz 8 dBi 4-Element Dual-Polarized Patch Antenna, N	No	Yes	8	N/A	8	-2	N/A	N/A	No	Yes
AIR-ANT2513P4M-N=	Legacy	2.4 GHz 13 dBi / 5 GHz 13 dBi Polarization Diverse Patch Array	No	Yes	13	N/A	13	1	N/A	N/A	Yes	Yes
AIR-ANT2513P4M-NS=	SIA	Polarization Diverse Patch Array	No	Yes	13	N/A	13	1	N/A	N/A	Yes	Yes
IW-ANT-OMV-2567-N	SIA	Tri-band 2.4 GHz 4 dBi, 5/6 GHz 7 dBi Omnidirectional Colinear Array Antenna, Vertically Polarized, N Male Connector	Yes	Yes	4	7	7	-7	7	-6	No	Yes
IW-ANT-OMH-2567-N	SIA	Tri-band 2.4 GHz 4 dBi, 5/6 GHz 7 dBi Omnidirectional Colinear Array Antenna, Horizontally Polarized, N Male Connector	Yes	Yes	4	7	7	-6	7	-4	No	Yes
IW-ANT-PNL-515-N=	SIA	Tri-band 5 GHz 15dBi Panel Antenna	Yes	Yes		15	15	3			Yes	Yes

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### 1.3 Table for EUT support function

Function	Support Band
AP	BLE, 5GHz, 4.9GHz
P2P/P2MP	BLE, 5GHz, 4.9GHz

Note1: For above table list, only AP mode was tested and recorded in this test.

Note2: The above information was declared by manufacturer.

### 1.4 Table for Radio function

Radio (R)	5GHz UNII 1~UNII 3	4.9 GHz	BLE	GPS
R1	V (AP: 20/40/80) (P2P/P2MP: 20/40/80)	V	V	-
R2	V (AP: 20/40/80/160) (P2P/P2MP: 20/40/80/160)	V	-	-
R3	-	-	-	V

Note: The above information was declared by manufacturer.

### 1.5 Applicable Standards

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

- 47 CFR Part 2.1091
- KDB 447498 D04 Interim General RF Exposure Guidance v01

The following reference test guidance is not within the scope of accreditation of TAF.

- 47 CFR Part 1.1307
- 47 CFR Part 1.1310
- RSS – 102 Issue 5

RSS – 102: IEEE C95.3-2002: *IEEE recommended practice for measurements and computations of radio frequency electromagnetic fields with respect to human exposure to such fields, 100 kHz-300 GHz.*

A device requiring an RF exposure evaluation shall be made in accordance with the latest version of IEEE C95.3

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## 2 Maximum Permissible Exposure

### 2.1 MPE Exemption - FCC

Option (A): 1.1307(b)(3)(i)(A): Available maximum time-averaged power is < 1 mW.

Option (B): 1.1307(b)(3)(i)(B): Device operates between 300 MHz and 6 GHz and the maximum time-averaged power or effective radiated power (ERP), whichever is greater,  $\leq P_{th}$ .

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

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);

Option (C): 1.1307(b)(3)(i)(C): ERP is below a threshold calculated based on the distance

$R$  between the person and the antenna / radiating structure, where  $R > \lambda / 2 \text{ TT}$ .

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	$19.2R^2$ .

Note:  $R$  is in meters,  $f$  is in MHz.

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## **Exemption Limits for Routine Evaluation - ISED RSS 102**

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<sup>6</sup> 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).

## 2.2 RF exposure evaluation exemption for FCC

Radio 1: 15dBi antenna gain

Prediction frequency (MHz)	5745
Maximum Output Power (dBm) – Antenna 1	15.1dBm
Maximum Output Power (dBm) – Antenna 2	14.1dBm
Duty Cycle	0.22dB
Tolerances	0.50dB
Max antenna gain	15dBi
EIRP (dBm)	33.3dBm
ERP (W)	1.306
Prediction distance (cm)	40
1500 MHz $\leq f < 100000$ MHz	MPE-based Exemption Threshold
	$P_{th}$ (W)
	$19.2R^2 = 3.072W$

Radio 2: 15dBi antenna gain

Prediction frequency (MHz)	5745
Maximum Output Power (dBm) – Antenna 1	17.8dBm
Maximum Output Power (dBm) – Antenna 2	17.4dBm
Duty Cycle	0.36dB
Tolerances	0.50dB
Max antenna gain	15dBi
EIRP (dBm)	35.97dBm
ERP (W)	2.415
Prediction distance (cm)	40
1500 MHz $\leq f < 100000$ MHz	MPE-based Exemption Threshold
	$P_{th}$ (W)
	$19.2R^2 = 3.072W$

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## 2.3 RF exposure evaluation exemption for ISED

### Radio 1: 15dBi antenna gain

Prediction frequency (MHz)	5745
Maximum Output Power (dBm) – Antenna 1	15.1dBm
Maximum Output Power (dBm) – Antenna 2	14.1dBm
Duty Cycle	0.22dB
Tolerances	0.50dB
Max antenna gain	15dBi
EIRP (dBm)	33.3dBm
EIRP (W)	2.13
Prediction distance (cm)	40
$300\text{MHz} \leq f < 6\text{GHz}$	MPE-based Exemption Threshold
	$P_{th} (\text{W})$
	$1.31 \times 10^{-2} f 0.6834 \text{ W} = 4.857 \text{ watt.}$

The routine evaluation is exempted because  $2.13 < 4.857$  watt.

### Radio 2: 15dBi antenna gain

Prediction frequency (MHz)	5745
Maximum Output Power (dBm) – Antenna 1	17.8dBm
Maximum Output Power (dBm) – Antenna 2	17.4dBm
Duty Cycle	0.36dB
Tolerances	0.50dB
Max antenna gain	15dBi
EIRP (dBm)	35.97dBm
ERP (W)	3.95
Prediction distance (cm)	40
$300\text{MHz} \leq f < 6\text{GHz}$	Exemption Limits for Routine Evaluation
	(W)
	$1.31 \times 10^{-2} f 0.6834 \text{ W} = 4.857 \text{ watt.}$

The routine evaluation is exempted because  $3.95\text{W} < 4.857$  watt.

## 2.4 Limit of Maximum Permissible Exposure

(A) Limits for Occupational / Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/ cm <sup>2</sup> )	Averaging Time  E  <sup>2</sup> , H  <sup>2</sup> or S (minutes)
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
300-1500	-	-	f/300	<6
1500-100,000	-	-	5	<6

(B) Limits for General Population / Uncontrolled Exposure

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

Note: f = frequency in MHz; \*Plane-wave equivalent power density

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## RSS-102 limits

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m <sup>2</sup> )	Reference Period (minutes)
0.003-10 <sup>21</sup>	83	90	-	Instantaneous*
0.1-10	-	0.73/ $f$	-	6**
1.1-10	87/ $f^{0.5}$	-	-	6**
10-20	27.46	0.0728	2	6
20-48	58.07/ $f^{0.25}$	0.1540/ $f^{0.25}$	8.944/ $f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	3.142 $f^{0.3417}$	0.008335 $f^{0.3417}$	0.02619 $f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	616000/ $f^{1.2}$
150000-300000	0.158 $f^{0.5}$	$4.21 \times 10^{-4} f^{0.5}$	$6.67 \times 10^{-5} f$	616000/ $f^{1.2}$

**Note:**  $f$  is frequency in MHz.

\* Based on nerve stimulation (NS).

\*\* Based on specific absorption rate (SAR).

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## 2.5 MPE Calculation Method

The MPE was calculated at 100 cm to show compliance with the power density limit.

The following formula was used to calculate the Power Density:

$$E \text{ (V/m)} = \frac{\sqrt{30 \xi P \xi G}}{d} \quad \text{Power Density: } Pd \text{ (W/m}^2\text{)} = \frac{E^2}{377}$$

**E** = Electric field (V/m)

**P** = RF output power (W)

**G** = EUT Antenna numeric gain (numeric)

**d** = Separation distance between radiator and human body (m)

The formula can be changed to

$$Pd = \frac{30 \xi P \xi G}{377 \xi d^2}$$

## 2.6 Calculated Result and Limit

Exposure Environment: General Population / Uncontrolled Exposure

For Radio 1

Antenna Gain – 15 dBi (integral antenna)

Frequency	DG (dBi)	Power (dBm)	EIRP (dBm)	Tolerance (dB)	Tune-up EIRP (dBm)	Tune-up EIRP (W)	Distance (cm)	S (mW/cm <sup>2</sup> )	S Limit (mW/cm <sup>2</sup> )
5220 MHz	15.0	17.0	32.0	0.50	32.50	1.22	40	0.088	1.00000
5320 MHz	15.0	12.0	27.0	0.50	27.50	0.562	40	0.028	1.00000
5660 MHz	15.0	12.0	27.0	0.50	27.50	0.562	40	0.028	1.00000
<b>5745 MHz</b>	<b>15.0</b>	<b>17.8</b>	<b>32.8</b>	<b>0.50</b>	<b>33.3</b>	<b>2.13</b>	<b>40</b>	<b>0.106</b>	<b>1.00000</b>
4950 MHz	15.0	15.0	30	0.50	30.50	1.22	40	0.056	1.00000

For Radio 1 - BLE

For Antenna – 5.5dBi (integral antenna)

Frequency	DG (dBi)	Power (dBm)	EIRP (dBm)	Tolerance (dB)	Tune-up EIRP (dBm)	Tune-up EIRP (W)	Distance (cm)	S (mW/cm <sup>2</sup> )	S Limit (mW/cm <sup>2</sup> )
2437 MHz	5.5	4.5	12.5	0.50	13.0	0.020	40	0.001	1.00000

For Radio 2

For Antenna – 15 dBi (external antenna)

Frequency	DG (dBi)	Power (dBm)	EIRP (dBm)	Tolerance (dB)	Tune-up EIRP (dBm)	Tune-up EIRP (W)	Distance (cm)	S (mW/cm <sup>2</sup> )	S Limit (mW/cm <sup>2</sup> )
5220 MHz	15.0	17.0	32.0	0.50	32.50	1.22	40	0.088	1.00000
5320 MHz	15.0	12.0	27.0	0.50	27.50	0.562	40	0.028	1.00000
5660 MHz	15.0	12.0	27.0	0.50	27.50	0.562	40	0.028	1.00000
<b>5745 MHz</b>	<b>15.0</b>	<b>20.47</b>	<b>35.47</b>	<b>0.50</b>	<b>35.97</b>	<b>3.95</b>	<b>40</b>	<b>0.197</b>	<b>1.00000</b>
4950 MHz	15.0	15.0	30	0.50	30.50	1.22	40	0.056	1.00000

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## 2.7 Calculations with additional transmitters

The FCC's MPE limits vary with frequency. Therefore, in mixed or broadband RF fields where several sources and frequencies are involved, the fraction of the recommended limit (in terms of power density or square of the electric or magnetic field strength) incurred within each frequency interval should be determined, and the sum of all fractional contributions should not exceed 1.0, or 100% in terms of percentage.

### **Worst Case Scenario:**

**BLE (Highest power) – 13dBm**

**5GHz Radio 1 – 34.50dBm**

**5GHz Radio 2 – 35.50dBm**

Total Power Densities (Percentages) = 5GHz Radio 1 Power Density % + 5GHz Radio 2 Power Density % +

BLE Power Density % + 4.9GHz Radio 1

Total Relative Power Densities (Percentages) =  $(0.106/1.0) *100 + (0.197/1.0) *100 + (0.001/1)*100 + (0.056/1.0)*100 = 10.6 \% + 19.7 \% + 1 \% + 5.6 \% = 36.9\%$

-----THE END-----