



W66 N220 Commerce Court • Cedarburg, WI 53012
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RF Evaluation Exclusion Exhibit For:

Sterling-LWB

Prepared by:

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Product Description:

The Sterling-LWB module is a module with support for WLAN (802.11 b/g/n), Bluetooth 2.1 +EDR, and BLE 4.1.

Associated Antenna(s):

The antennas associated with the EUT are:

1. Johanson Technology 2.4 GHz high frequency ceramic chip antenna. Part number 2450AT18D0100 with a peak antenna gain of 1.5 dBi.
2. LSR 2.4 GHz FlexPIFA antenna. Part number 001-0014 with a peak antenna gain of 2.0 dBi.
3. LSR 2.4 GHz FlexNotch antenna. Part number 001-0015 with peak antenna gain of 2.0 dBi.
4. LSR 2.4 GHz Dipole antenna. Part number 001-0010 with peak antenna gain of 2.0 dBi.

Statement of compliance:

The Sterling-LWB module was evaluated against the requirements and limits of OET Bulletin 65, KDB 447498 as well as RSS-102 Issue 5 and was found to be compliant.

Limits:

A. Mobile (MPE)

OET Bulletin 65 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 ²)	Averaging Time E ² , H ² or S (minutes)
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

RSS 102 limits for General population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m ²)	Reference Period (minutes)
0.003-10 ²¹	83	90	-	Instantaneous*
0.1-10	-	0.73/ <i>f</i>	-	6**
1.1-10	87/ <i>f</i> ^{0.5}	-	-	6**
10-20	27.46	0.0728	2	6
20-48	58.07/ <i>f</i> ^{0.25}	0.1540/ <i>f</i> ^{0.25}	8.944/ <i>f</i> ^{0.5}	6
48-300	22.06	0.05852	1.291	6
300-6000	3.142 <i>f</i> ^{0.3417}	0.008335 <i>f</i> ^{0.3417}	0.02619 <i>f</i> ^{0.6834}	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	616000/ <i>f</i> ^{1.2}
150000-300000	0.158 <i>f</i> ^{0.5}	4.21 x 10 ⁻⁴ <i>f</i> ^{0.5}	6.67 x 10 ⁻⁵ <i>f</i>	616000/ <i>f</i> ^{1.2}
<p>Note: <i>f</i> is frequency in MHz. *Based on nerve stimulation (NS). ** Based on specific absorption rate (SAR).</p>				

Per RSS 102 issue 5 section 2.5.2, RF exposure evaluation is required if separation distance between the user and/or bystander and the device's radiating element is greater than 20cm, except when the device operates as follows:

- below 20 MHz 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 22.48/*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 x 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).

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B. Portable (SAR Test Exclusion Threshold).

FCC:

SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 20 cm

1-g SAR test exclusion threshold equation:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] * [\text{vf(GHz)}] \leq 3.0$$

10-g SAR test exclusion threshold equation:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] * [\text{vf(GHz)}] \leq 7.5$$

RSS 102:

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤ 5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤ 300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥ 50 mm
≤ 300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW
835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

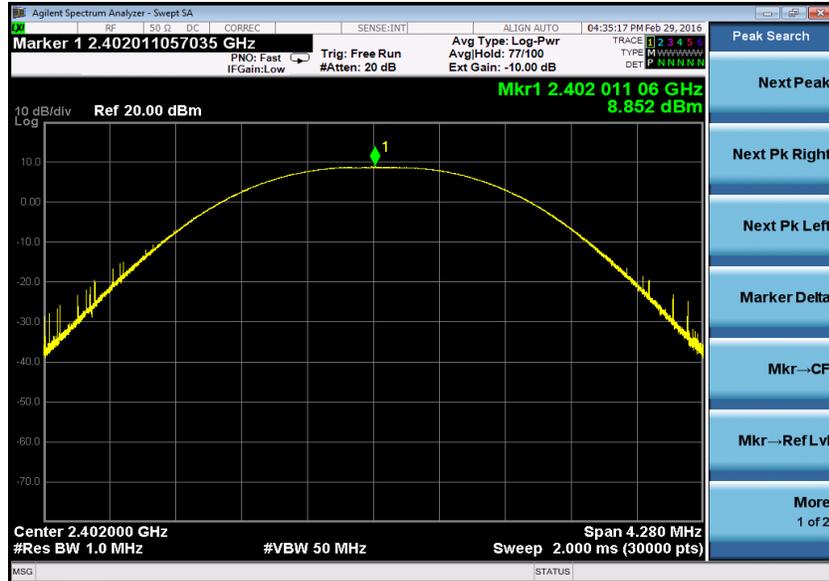
Note:

1. Table above if for 1-gram tissue, head and body, evaluation (uncontrolled). Limb-worn devices where 10-gram tissue applies, multiply limit by a factor of 2.5

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Data and calculations:

Screen Capture of maximum output power



Frequency 2402 MHz; GFSK



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A. MPE Calculation

RF exposure compliance will be shown by applying SAR exemption.
Please refer to section B

B. SAR Test Exclusion

FCC:

Frequency = 2402MHz

Output Power = 8.9 dBm

Tune Up Tolerance = 2.5 dB

EIRP = 11.4 dBm = 13.80mW

Minimum separation distance for SAR test exclusion (1g tissue) = $(P_{out} * [v_f(\text{GHz})])/3$
= $(13.80 * 1.55)/3$
= **7.13 mm**

RSS 102:

Frequency = 2402MHz

Output Power = 8.9 dBm

Tune Up Tolerance = 2.5 dB

Antenna gain = 2 dBi

EIRP = 13.4 dBm = 21.88 mW

Minimum separation distance for SAR test Exclusion (1g tissue) = **11.31 mm** (based on table 1 of RSS 102)

Summary:

Based on the calculation above, the EUT, when used in a portable application complies with SAR test exclusion requirement when used at a minimum separation distance of at least **11.31 mm**.