

RF Exposure Estimation

1. Introduction

Applicant:	Zhejiang Lingzhu Technology CO., Ltd
Address:	Room 302, No 1 Building Huace Center, Xihu District, Hangzhou City, Zhejiang Province, China
Product:	Smart Tag
FCC ID:	2BEWX-TTFM-53
Model No.:	TTFM-53
Reference RF report #	709502407723-00A

2. B.2 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of § 1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance. The 1 mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph § 1.1307(b)(3)(ii)(A). The 1 mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

3. B.4 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of § 1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by Formula (B.2).

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B.2})$$

where

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

and f is in GHz, d is the separation distance (cm), and ERP20cm is per Formula (B.1). The example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

Table B.2 Example Lower Thresholds (mW)											
Frequency (MHz)	Distance (mm)										
		5	10	15	20	25	30	35	40	45	50
	300	39	65	88	110	129	148	166	184	201	217
	450	22	44	67	89	112	135	158	180	203	226
	835	9	25	44	66	90	116	145	175	207	240
	1900	3	12	26	44	66	92	122	157	195	236
	2450	3	10	22	38	59	83	111	143	179	219
	3600	2	8	18	32	49	71	96	125	158	195
	5800	1	6	14	25	40	58	80	106	136	169

4. RF Exposure Evaluation

Per the test report included herein, for 2402-2480MHz

Transmitter output power for 2402-2480MHz Function

Maximum peak output power at antenna input terminal (dBm):	4.58
tune-up conducted power(dBm):	5
Antenna Gain, typical (dBi):	-4.44
EIRP (dBm)	0.56
EIRP (mW):	1.138 (mW)

Note: The tune-up conducted power (5 dBm) was declared by the manufacturer.



We used the maximum ERP/EIRP to perform RF exposure exemption evaluation.

	Evaluation method	Exempt Limit (mW)	Verdict
<input type="checkbox"/>	Blanket 1 mW Blanket Exemption	1mW	
<input checked="" type="checkbox"/>	MPE-based Exemption (ERP)	3mW (EIRP)	Yes
<input type="checkbox"/>	SAR-based Exemption (Pth)	3060mW	N/A

So, the device is qualified for SAR test exemption, the exemption report is in lieu of the SAR report.

- TÜV SÜD Certification and Testing (China) Co., Ltd. Shanghai Branch

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EMC Test Engineer
Date: Oct. 23, 2024

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