

FCC §15.247 (i) & §1.1307 (b) (3) - RF EXPOSURE EVALUATION

Applicable Standard

According to subpart 15.247 (i) and §1.1307(b) (3), systems operating under the provisions of this section shall be operated in a manner that ensures the public is not exposed to RF energy level in excess of the communication guidelines.

According to KDB 447498 D04 Interim General RF Exposure Guidance

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.

Per § 1.1307(b)(3)(i)(B), for single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2) of this section): A single RF source is exempt if:

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);

Finally, when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

Result**For worst case:**

Exemption limit:

For $f=915.5\text{MHz}$, $d=0.5\text{cm}$, the $P_{th}=8.13\text{mW}$

For limb-worn devices, the exemption limits= $2.5*8.13\text{mW}=20.33\text{mW}$.

The higher of the available maximum time-averaged power or effective radiated power (ERP):

The antenna gain is $0.25\text{dBi}(-1.90\text{dBd})$, $0\text{dBd}=2.15\text{dBi}$

The maximum tune-up conducted power is $13.0\text{dBm}(19.95\text{mW})$, which less than $20.33\text{mW}@915.5\text{MHz}$ exemption limit.

Note1: This device is a handheld device.

Note2: The BLE cannot transmit at the same time with the Lora.

So the stand-alone SAR evaluation can be exempted.