

PCTEST ENGINEERING LABORATORY, INC.

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RF EXPOSURE EVALUATION Maximal Permissible Exposure [MPE]

Applicant Name: Netcomm Wireless Limited 18-20 Orion Road Lane Cove NSW 2066 Sydney Austrailia

Date of Testing: 7/31-10/2/2019 **Test Site/Location:** PCTEST Lab. Columbia, MD, USA **Test Report Serial No.:** 1M1907090120-5-R1.XIA

FCC ID: XIA-IFWA661

APPLICANT: Netcomm Wireless Limited

EUT Type: Outdoor LTE Router Model: IFWA-661, OWAR1-35

FCC Part 1 (§1.1310) and Part 2 (§2.1091) **FCC Rule Part:**

KDB 447498 D01 Test Procedure(s):

This equipment has been shown to be capable of compliance with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures specified in FCC KDB 447498 D01. Test results reported herein relate only to the item(s) tested.

This revised Test Report (S/N: 1M1907090120-4-R1.XIA) supersedes and replaces the previously issued test report (S/N: 1M1907090120-5.XIA) on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Randy Ortanez President





FCC ID: XIA-IFWA661	PCTEST*	MAXIMUM PERMISSIBLE EXPOSURE REPORT	mm Wireless	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:		Dage 1 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router		Page 1 of 7



TABLE OF CONTENTS

RF E	EXPOSURE EVALUATION – MAXIMUM PERMISSIBLE EXPOSURE (MPE)	3
1.1	Introduction	3
1.2	EUT Description	3
1.3	MPE Requirements Overview	4
1.4	Procedure	5
1.5	Summary of Results	6
CON	NCLUSION	7
	1.1 1.2 1.3 1.4 1.5	RF EXPOSURE EVALUATION – MAXIMUM PERMISSIBLE EXPOSURE (MPE) 1.1 Introduction 1.2 EUT Description 1.3 MPE Requirements Overview 1.4 Procedure 1.5 Summary of Results CONCLUSION

FCC ID: XIA-IFWA661	PCTEST* ENGINEERING LABORATORY, INC.	MAXIMUM PERMISSIBLE EXPOSURE REPORT	CommWireless	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:		Daga 2 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router		Page 2 of 7



1.0 RF EXPOSURE EVALUATION - MAXIMUM PERMISSIBLE EXPOSURE (MPE)

1.1 Introduction

This document is prepared to show compliance with the RF Exposure requirements as required in §1.1310 of the FCC Rules and Regulations and RSS-102 of Industry Canada.

The limit for Maximum Permissible Exposure (MPE), specified in FCC §1.1310, is listed in Table 1-1. According to FCC §1.1310 and RSS-102: the criteria listed in the following table shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b).

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm²)	Average Time (Minutes)	
(A	(A) Limits For Occupational / Control Exposures (f = frequency)				
30-300	61.4	0.163	1.0	6	
300-1500			f/300	6	
1500-100,000			5.0	6	
(B) Lim	(B) Limits For General Population / Uncontrolled Exposure (f = frequency)				
30-300	27.5	0.073	0.2	30	
300-1500			f/1500	30	
1500-100,000			1.0	30	

Table 1-1. Limits for Maximum Permissible Exposure (MPE)

1.2 EUT Description

The **Netcomm FCC ID: XIA-IFWA661** is an Outdoor LTE Router that operates with a 19dBi gain antenna.

FCC ID: XIA-IFWA661	PCTEST* ENGINEERING LABORATORY, INC.	MAXIMUM PERMISSIBLE EXPOSURE REPORT	NetCommWireless	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:		Dama 2 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router		Page 3 of 7



1.3 **MPE Requirements Overview**

Three different categories of transmitters are defined by the FCC KDB 447498 D01. These categories are fixed installation, mobile, and portable and are defined as follows:

- Fixed Installations: fixed location means that the device, including its antenna, is physically secured at a permanent location and is not able to be easily moved to another location. Additionally, distance to humans from the antenna is maintained to at least 2 meters.
- Mobile Devices: a mobile device is defined as a transmitting device designed to be used in other than fixed locations and to be generally used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's radiating structures and the body of the user or nearby persons. Transmitters designed to be used by consumers or workers that can be easily relocated, such as a wireless modem operating in a laptop computer, are considered mobile devices if they meet the 20 centimeter separation requirement. The FCC rules for evaluating mobile devices for RF compliance are found in 47 CFR §2.1091.
- Portable Devices: a portable device is defined as a transmitting device designed to be used so that the radiating structure(s) of the device is/are within 20 centimeters of the body of the user. Portable device requirements are found in Section 2.1093 of the FCC's Rules (47 CFR§2.1093).

The FCC also categorizes the use of the device as based upon the user's awareness and ability to exercise control over his or her exposure. The two categories defined are Occupational/ Controlled Exposure and General Population/Uncontrolled Exposure. These two categories are defined as follows:

- Occupational/Controlled Exposure: In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means. Awareness of the potential for RF exposure in a workplace or similar environment can be provided through specific training as part of a RF safety program. If appropriate, warning signs and labels can also be used to establish such awareness by providing prominent information on the risk of potential exposure and instructions on methods to minimize such exposure risks.
- General Population/Uncontrolled Exposure: The general population / uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity. Warning labels placed on low-power consumer devices such as cellular telephones are not considered sufficient to allow the device to be considered under the occupational/controlled category, and the general population/uncontrolled exposure limits apply to these devices.

The Netcomm Outdoor LTE Router FCC ID: XIA-IFWA661 is evaluated to the Fixed Installation requirements and is considered a device to be used by the General Population/Uncontrolled Exposure.

FCC ID: XIA-IFWA661	PCTEST* ENGINEERING LABORATORY, INC.	MAXIMUM PERMISSIBLE EXPOSURE REPORT	NetCommWireless	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:		Dage 4 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router		Page 4 of 7



1.4 Procedure

The procedure used to determine the RF power density was based upon a calculation for determining compliance with the MPE requirements.

The power generated by each transmitter used in this product was initially measured by a power meter and the powers were recorded. Through use of the Friis transmission formula and knowledge of the maximum antenna gain to be used, the power density level is calculated at a distance of 20cm.

Friis Transmission Formula

Friis transmission formula: $P_d = (P_{out}*G) / (4\pi r^2)$

Where,

 P_d = Power Density (mW/cm²) π = 3.1416

P_{out} = output power to antenna (mW) r = distance between observation point and center of the radiator (cm)

G = gain of antenna in linear scale

Calculated MPE

The power density limit for General Population/Uncontrolled Exposure at each frequency is determined based on the information in Table 1-1.

There is no co-location between the electric fields of any two transmitters therefore following power densities are calculated for each individual transmitter by frequency at 20cm spacing:

Frequency	3700	MHz		
Limit	1.000	mW/cm^2		
Distance (cm), R =	20	cm		
Power (dBm), P =	23.13	dBm	205.59	mW
Power with SBTA (dBm), P =	21.58	dBm	143.91	mW
TX Ant Gain (dBi), G =	19	dBi		
Power Density (S) =	2.274	mW/cm^2	(at 20cm)	
Minimum Distance =	30.2	cm		

Table 1-2. Calculated MPE Data for 3.7GHz Band - Main Antenna

Frequency:	3700	MHz		
Limit:	1.000	mW/cm ²		
Distance (cm), R =	20	cm		
Power (dBm), P =	22.87	dBm	193.64	mW
Power with SBTA (dBm), P =	21.32	dBm	135.55	mW
TX Ant Gain (dBi), G =	19	dBi		
Power Density (S) =	2.1420	mW/cm ²	(at 20cm)	
Minimum Distance =	29.3	cm		

Table 1-3. Calculated MPE Data for 3.7GHz Band - Diversity Antenna

FCC ID: XIA-IFWA661	PCTEST* ENGINEERING LABORATORY, INC.	MAXIMUM PERMISSIBLE EXPOSURE REPORT	NetComm Wireless	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:		Page 5 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router	loor LTE Router	



1.5 Summary of Results

Frequency Band [MHz]	Maximum Antenna Gain [dBi]	1 mW/cm² MPE Distance [cm]	Test Result
3.7GHz – Main	19	30.2	PASS
3.7GHz - Diversity	19	29.3	PASS

Table 1-4. Maximum Permissible Exposure Summary Table

FCC ID: XIA-IFWA661	MAXIMUM PERMISSIBLE EXPOSURE REPORT REPORT		ess Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:	Done 6 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router	Page 6 of 7



2.0 CONCLUSION

The device meets the fixed installation RF exposure limit at the distances listed in Table 1-4 as specified in §2.1091 of the FCC Rules and Regulations and Health Canada Safety Code 6. An appropriate RF exposure compliance statement will be placed in the user's manual.

FCC ID: XIA-IFWA661	PCTEST* ENGINEERING LABORATORY, INC.	MAXIMUM PERMISSIBLE EXPOSURE REPORT REPORT	Approved by: Quality Manager
Test Report S/N:	Test Dates:	EUT Type:	Dage 7 of 7
1M1907090120-2.XIA	7/31-10/2/2019	Outdoor LTE Router	Page 7 of 7