

# Inter Lab

# RF Exposure and Maximum ERP/EIRP Assessment

For

TOBY-L210 GSM/UMTS Module

FCC ID: XPYTOBYL210 IC: 8595A-TOBYL210

Assessment Reference: MDE\_UBLOX\_1409\_MPEa Rev3

Test Laboratory:

Borsigstrasse 11 Germany 7Layers AG 40880 Ratingen



Note:

The following test results relate only to the devices specified in this document. This report shall not be reproduced in parts without the written approval of the test laboratory.

7 layers AG Borsigstrasse 11 40880 Ratingen, Germany Phone: +49 (0) 2102 749 0 Fax: +49 (0) 2102 749 350 www.7Layers.com Aufsichtsratsvorsitzender • Chairman of the Supervisory Board: Peter Mertel Vorstand • Board: Dr. H.-J. Meckelburg Dr. H. Ansorge

Registergericht • registered in: Düsseldorf, HRB 44096 USt-IdNr • VAT No.: DE 203159652 TAX No. 147/5869/0385



# **Table of Contents**

| 0 | ) Summary                       |  |                  |  |  |  |
|---|---------------------------------|--|------------------|--|--|--|
|   | 0.1                             | Technical Report Summary   | 3                |  |  |  |
| 1 | Adm                             | inistrative Data   | 4                |  |  |  |
|   | 1.1<br>1.2<br>1.3<br>1.4        | Testing Laboratory<br>Project Data<br>Applicant Data<br>Manufacturer Data  | 4<br>4<br>4      |  |  |  |
| 2 | Test                            | object Data  | 5                |  |  |  |
|   | 2.1<br>2.2<br>2.3<br>2.4<br>2.5 | General EUT Description EUT Main components Ancillary Equipment Auxiliary Equipment Operating Modes                  | 5<br>5<br>5<br>6 |  |  |  |
| 3 | Eval                            | uation Results   | 7                |  |  |  |
|   | 3.1<br>3.2<br>3.3               | Maximum ERP / EIRP RF Exposure Evaluation for Module RF Exposure Evaluation for multiple transmitters in co-location | 7<br>8<br>10     |  |  |  |



# 0 Summary

# 0.1 Technical Report Summary

# Type of Report

RF Exposure and Maximum ERP/EIRP Assessment for a GSM/UMTS/LTE radio module. Including RF Exposure for use with co-located radios on generic host device.

# **Applicable FCC Rules**

#### For RF Exposure:

OET Bulletin 65 Edition 97-01 August 1997 FCC 47 CFR §1.1307 FCC 47 CFR §1.1310 RSS-102 Issue 4 – March 2010

# For Maximum ERP/EIRP:

FCC 47 CFR §22.913 IC SRSP-503 Issue 7, September 2008 IC SRSP-510 Issue 5, February 2009 FCC 47 CFR §27.50(d) RSS-139, Issue 2 / SRSP-513

| Report version control       |            |                                    |           |  |  |
|------------------------------|------------|------------------------------------|-----------|--|--|
| Version Release date Changes |            |                                    |           |  |  |
| 001                          | 24.09.2014 | Initial version                    | Not Valid |  |  |
| 002                          | 20.10.2014 | Applied Tune-up values to ERP/EIRP | Valid     |  |  |

Responsible for Accreditation Scope: Responsible for Report:



# 1 Administrative Data

# 1.1 Testing Laboratory

| Company Name:   | 7Layers AG   |
|---|--|
| Address   | Borsigstr. 11<br>40880 Ratingen<br>Germany   |
| This facility has been fully described in a report sub number 96716.                  | mitted to the FCC and accepted under the registration  |
| The test facility is also accredited by the following a Laboratory accreditation no.: | occreditation organisation:<br>DAkkS D-PL-12140-01-01  |
| Responsible for Accreditation Scope:  | DiplIng. Bernhard Retka DiplIng. Robert Machulec DiplIng. Andreas Petz DiplIng. Marco Kullik |
| Report Template Version:  | 2014-05-15   |
| 1.2 Project Data  |  |
| Responsible for assessment and report:  | Mr. Patrick Lomax  |
| Date of Report:   | 2014-09-23   |
| 1.3 Applicant Data  |  |
| Company Name:   | u-blox AG  |
| Address:  | Zürcherstrasse 68,<br>CH-8800 Thalwil<br>Switzerland   |
| Contact Person:   | Giulio Comar   |
| 1.4 Manufacturer Data   |  |
| Company Name:   | please see applicant data  |
| Address:  |  |
| Contact Person:   |  |



# 2 Test object Data

# 2.1 General EUT Description

**Equipment under Test** TOBY-L210 Module **Type Designation:** TOBY-L210

Kind of Device: GPRS/EDGE MSC GSM/UMTS/LTE Data Module

GPRS Multi-slot class 12

 FCC ID:
 XPYTOBYL210

 IC Number:
 8595A-TOBYL210

#### General product description:

The EUT is Cellular radio module supporting GSM/GPRS/WCDMA/HSDPA/HSUPA/LTE

# 2.2 EUT Main components

# Type, S/N, Short Descriptions etc. used in this Test Report

| Short Description | <b>Equipment under Test</b> | Type Designation | Serial No.      | <b>HW Status</b> | SW Status |
|-------------------|-----------------------------|------------------|-----------------|------------------|-----------|
| EUT A Code:       | TOBY-L210                   | L210             | 352255060017906 | 192B00           | 09.41     |
| DE1015004BC13     |                             |                  |                 |                  |           |

NOTE: The short description is used to simplify the identification of the EUT in this test report.

# 2.3 Ancillary Equipment

For the purposes of this test report, ancillary equipment is defined as equipment which is used in conjunction with the EUT to provide operational and control features to the EUT. It is necessary to configure the system in a typical fashion, as a customer would normally use it. But nevertheless Ancillary Equipment can influence the test results.

| Short<br>Description | Equipment<br>under Test | Type<br>Designation | HW Status | SW Status | Serial no. | FCC ID |
|----------------------|-------------------------|---------------------|-----------|-----------|------------|--------|
| N/A                  |                         | •                   |           | •         |            | -      |

# 2.4 Auxiliary Equipment

For the purposes of this test report, auxiliary equipment is defined as equipment which is used temporarily to enable operational and control features especially used for the tests of the EUT which is not used during normal operation or equipment that is used during the tests in combination with the EUT but is not subject of this test report. It is necessary to configure the system in a typical fashion, as a customer would normally use it. But nevertheless Auxiliary Equipment can influence the test results.

| Short       | Equipment  | Type        | Serial no. | HW Status | SW Status | FCC ID |
|-------------|------------|-------------|------------|-----------|-----------|--------|
| Description | under Test | Designation |            |           |           |        |
| N/A         |            |             |            |           |           | _      |



# 2.5 Operating Modes

This chapter describes the operating modes of the EUTs used for testing.

| Op. Mode   | Description of Operating Modes  | Remarks                           |
|--|---|-----------------------------------|
| Op-mode 1  | EUT transmitting in standalone configuration  | Antenna-to-person distance > 20cm |
| Op-mode 2 EUT transmitting in the 850 MHz Band simultaneously with a generic Bluetooth radio.                |   | Antenna-to-person distance > 20cm |
| Op-mode 3  | EUT transmitting in the 1900 MHz Band simultaneously with a generic Bluetooth radio.                | Antenna-to-person distance > 20cm |
| Op-mode 4  | EUT transmitting in the 850 MHz Band simultaneously with a generic WLAN radio.                      | Antenna-to-person distance > 20cm |
| Op-mode 5 EUT transmitting in the 1900 MHz Band simultaneously with a generic WLAN radio.                    |   | Antenna-to-person distance > 20cm |
| Op-mode 6 EUT transmitting in the 850 MHz Band simultaneously with a generic Bluetooth radio and WLAN radio. |   | Antenna-to-person distance > 20cm |
| Op-mode 7  | EUT transmitting in the 1900 MHz Band simultaneously with a generic Bluetooth radio and WLAN radio. | Antenna-to-person distance > 20cm |
| Op-mode 14   | EUT transmitting in the 2500 MHz Band simultaneously with a generic Bluetooth radio.                | Antenna-to-person distance > 20cm |
| Op-mode 15   | EUT transmitting in the 2500 MHz Band simultaneously with a generic WLAN radio.                     | Antenna-to-person distance > 20cm |
| Op-mode 16   | EUT transmitting in the 2500 MHz Band simultaneously with a generic Bluetooth radio and WLAN radio. | Antenna-to-person distance > 20cm |



# 3 Evaluation Results

# 3.1 Maximum ERP / EIRP

| Standard                    | Frequency Band                                  |
|-----------------------------|---|
| FCC 47 CFR §22.913          | (850MHZ GSM/GPRS) (FDD5 WCDMA/HSUPA/HSDPA/LTE)  |
| IC RSS-132, Issue 3         |   |
| FCC 47 CFR §24.232          | (1900MHZ GSM/GPRS) (FDD2 WCDMA/HSUPA/HSDPA/LTE) |
| IC RSS-133 Issue 6          |   |
| FCC 47 CFR §27.50(d)        | (FDD4,7,17 UMTS/LTE)                            |
| RSS-139, Issue 2 / SRSP-513 |   |

# 3.1.1 Test Limits

For the 850MHz band, FCC §22.913 states that the maximum ERP of this device shall not exceed 7 Watts. IC SRSP-503 Issue 7, states that this device shall not exceed a maximum EIRP of 11.5 Watts For the purposes of this test report, the 7 Watt ERP limit stipulated in FCC §22.913 has been converted to an equivalent ERIP value of 11.5 Watts.

For all other limits, refer to the values stipulated in the corresponding tables.

# 3.1.2 Test Protocol

| Band   | Mode | Duty Cycle<br>(%) | Frequency (MHZ) | Maximum<br>Conducted<br>output power<br>(dBm) | Maximum<br>Conducted<br>output power<br>(mW) | Freq of highest<br>power | FCC / IC<br>EIRP limit<br>(mW) | Maximum<br>antenna gain to<br>meet EIRP Limit<br>(dBi) |
|--------|------|-------------------|-----------------|---|--|--------------------------|--------------------------------|--|
| 850    | GSM  | 50.0%             | 836.2 - 848.8   | 33.25   | 2113.48904                                   | 848.80                   | 11484                          | 7.4  |
|        |      |                   |                 |   |  |                          |                                |  |
| 1900   | GSM  | 50.0%             | 1850.2 - 1909.8 | 30.2  | 1047.128548                                  | 1909.80                  | 2000                           | 2.8  |
| FDD 2  | UMTS | 100.0%            | 1850 - 1907.6   | 24.5  | 281.8382931                                  | 1852.40                  | 2000                           | 8.5  |
| FDD 5  | UMTS | 100.0%            | 824 - 846.6     | 24.5  | 281.8382931                                  | 846.60                   | 11484                          | 16.1   |
| eFDD 5 | LTE  | 100.0%            | 824 - 849       | 24  | 251.1886432                                  | 826.50                   | 11484                          | 16.6   |
| eFDD 7 | LTE  | 100.0%            | 2500-2570       | 24  | 251.1886432                                  | 2535.00                  | 1000                           | 6.0  |

# 3.1.3 Conclusion

| All gains in (dBi) | Band     | Max gain to be used to comply with EIRP Limits | Max gain to be<br>used to comply<br>with MPE Limits | Maximum gain<br>to be compliant<br>with all limits |
|--------------------|----------|--|---|--|
|                    | GSM 850  | 7.4  | 4.3   | 4.3  |
|                    | GSM 1900 | 2.8  | 9.8   | 2.8  |
|                    | FDD 7    | 6.0  | 13.0  | 6.0  |



# 3.2 RF Exposure Evaluation for Module

| Standards                                 |
|---|
| OET Bulletin 65 Edition 97-01 August 1997 |
| FCC 47 CFR §1.1307                        |
| FCC 47 CFR §1.1310                        |
| RSS-102 Issue 4 – March 2010              |

# 3.2.1 Test limits

As specified in Table 1B of 47 CFR 1.1310 – Limits for Maximum Permissible Exposure (MPE), Limits for General Population/Uncontrolled Exposure.

| Frequency range (MHz) | Power density (mW/cm²) |
|-----------------------|------------------------|
| 300 – 1,500           | f/1500                 |
| 1,500 – 100,000       | 1.0                    |

Equation OET bulletin 65, page 18, edition 97-01: 
$$S=rac{PG}{4\pi R^2}=rac{EIRP}{4\pi R^2}$$

Where:

S = power density

P = power input to the antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the centre of radiation of the antenna



# 3.2.2 Test Protocol

|        | Maximu | m ante | nna gain  | to comply w  | ith MPE I | imits for FCC | and Indus | stry Cana | da         |
|--------|--------|--------|-----------|--------------|-----------|---------------|-----------|-----------|------------|
|        |        |        |           |              |           |               |           | Maximum   |            |
|        |        |        |           |              | Maximum   |               |           | antenna   |            |
|        |        |        |           | Maximum      | Conducted | Equivalent    |           | gain to   |            |
|        |        |        |           | Conducted    | output    | conducted     |           | meet      | Separation |
|        |        | Duty   | Frequency | output power | power     | output power  | MPE Limit | MPE Limit | distance   |
| Band   | Mode   | Cycle  | (MHZ)     | (dBm)        | (mW)      | (mW)          | (mW/cm²)  | (dBi)     | (cm)       |
|        | GSM /  |        |           |              |           |               |           |           |            |
| 850    | GPRS   | 50%    | 848.8     | 33.25        | 2113.49   | 1056.82       | 0.5659    | 4.3       | 20         |
|        | GSM /  |        |           |              |           |               |           |           |            |
| 1900   | GPRS   | 50%    | 1909.8    | 30.2         | 1047.13   | 523.60        | 1.0000    | 9.8       | 20         |
| FDD 2  | UMTS   | 100.0% | 1852.4    | 24.5         | 281.84    | 281.84        | 1.0000    | 12.5      | 20         |
| FDD 5  | UMTS   | 100.0% | 846.6     | 24.5         | 281.84    | 281.84        | 0.5644    | 10.0      | 20         |
| eFDD 5 | LTE    | 100.0% | 826.5     | 24           | 251.19    | 251.19        | 0.5510    | 10.4      | 20         |
| eFDD 7 | LTE    | 100.0% | 2535.0    | 24           | 251.19    | 251.19        | 1.0000    | 13.0      | 20         |

<sup>\*</sup> Conducted output power values bases on "Tune-up" information provided by manufacturer.

# 3.2.3 Conclusion

| Maximum antenna gain for MPE compliance | Frequency Band | Maximum gain to be used for MPE Compliance |
|---|----------------|--|
|   | 850 MHz        | 4.3  |
|   | 1900 MHz       | 9.8  |
|   | 2500 MHz       | 13.0                                       |



# 3.3 RF Exposure Evaluation for multiple transmitters in co-location

| Standards                                 |
|---|
| OET Bulletin 65 Edition 97-01 August 1997 |
| FCC 47 CFR §1.1307                        |
| FCC 47 CFR §1.1310                        |
| RSS-102 Issue 4 – March 2010              |

#### 3.3.1 Co-Location Considerations

The calculation below is used to consider situations in which simultaneous exposure to fields of different frequencies occur. The calculation is performed by the sum of each relative exposure for each equipment according to the following criteria.

$$\sum_{1}^{N} \frac{S_{eqn}}{S_{Limn}} = \frac{S_{eq1}}{S_{Lim1}} + \frac{S_{eq2}}{S_{Lim2}} + \dots + \frac{S_{eqN}}{S_{LimN}} \le 1$$

Where:

 $S_{eq}$  is the power density of the electromagnetic field at a given distance by a specific transmitter and a defined frequency.

**S**<sub>lin</sub> is the MPE limit for the frequency being evaluated.

#### 3.3.2 Assumptions

- 1. Primary transmitter does not support power reduction for multiple time slots on the uplink.
- 2. Antenna separation from is  $\geq$  20cm.
- 3. Separation distance between co-located transmitting antennas is 0cm.
- 4. Hypothetical Bluetooth radio is assumed to have an EIRP of 100mW.
- 5. Hypothetical WLAN radio is assumed to have an EIRP of 2000mW.

# 3.3.3 Test Protocol

The below table is to determine the MPE values using the maximum gain values obtained in section 3.3.4 of this document.

## OP mode-1

|        |            | Duty   | Frequency | Maximum<br>Conducted<br>output<br>power | Equivalent conducted output power | MPE Limit | MPE<br>Value<br>using | Separation distance |         |
|--------|------------|--------|-----------|---|-----------------------------------|-----------|-----------------------|---------------------|---------|
| Band   | Mode       | Cycle  | (MHZ)     | (dBm)                                   | (mW)                              | (mW/cm²)  | Max gain              | (cm)                | Verdict |
| 850    | GSM / GPRS | 50%    | 848.8     | 33.25                                   | 1056.82                           | 0.5659    | 0.3182                | 20                  | Pass    |
| 1900   | GSM / GPRS | 50%    | 1909.8    | 30.2                                    | 523.60                            | 1.0000    | 0.5858                | 20                  | Pass    |
| FDD 2  | UMTS       | 100.0% | 1852.4    | 24.5                                    | 281.84                            | 1.0000    | 0.0849                | 20                  | Pass    |
| FDD 5  | UMTS       | 100.0% | 846.6     | 24.5                                    | 281.84                            | 0.5644    | 0.0849                | 20                  | Pass    |
| eFDD 5 | LTE        | 100.0% | 826.5     | 24                                      | 251.19                            | 0.5510    | 0.0756                | 20                  | Pass    |
| eFDD 7 | LTE        | 100.0% | 2535.0    | 24                                      | 251.19                            | 1.0000    | 0.5738                | 20                  | Pass    |

<sup>\*</sup> Conducted output power values bases on "Tune-up" information provided by manufacturer.



MPE Values for the generic Bluetooth and WLAN radios operating alone. These values are used to calculate the relative exposure for simultaneous transmission with the primary transmitter.

| MPE Calculation for Single Transmitter installed in Generic host |               |           |                            |                       |                                  |                              |                                |         |
|--|---------------|-----------|----------------------------|-----------------------|----------------------------------|------------------------------|--------------------------------|---------|
| Radio type   | Duty<br>Cycle | EIRP (mW) | EIRP<br>Equivalent<br>(mW) | MPE Limit<br>(mW/cm²) | Maximum<br>antenna gain<br>(dBi) | Power<br>density<br>(mW/cm²) | Separation<br>distance<br>(cm) | Verdict |
| Bluetooth  | 25%           | 100.00    | 76.43                      | 1.0000                | 0.0                              | 0.0152                       | 20                             | Pass    |
| WLAN   | 100%          | 2000.00   | 2000.00                    | 1.0000                | 0.0                              | 0.3979                       | 20                             | Pass    |

| OP-Mode | Mode          | EIRP      | Frequency (MHZ) | S <sub>eq</sub> | <b>S</b> lin<br>(mW/cm²) | S <sub>eq</sub><br><br>S <sub>Lin</sub> | Verdict |
|---------|---------------|-----------|-----------------|-----------------|--------------------------|---|---------|
| 850     | GSM /<br>GPRS | 1330.4544 | 848.8           | 0.3182          | 0.5659                   | 0.56236256                              | Pass    |
| 1900    | GSM /<br>GPRS | 659.1739  | 1909.8          | 0.5858          | 1.0000                   | 0.58577457                              | Pass    |
| FDD 2   | UMTS          | 354.8134  | 1852.4          | 0.3153          | 1.0000                   | 0.31530475                              | Pass    |
| FDD 5   | UMTS          | 354.8134  | 846.6           | 0.0849          | 0.5644                   | 0.15036387                              | Pass    |
| eFDD 5  | LTE           | 316.2278  | 826.5           | 0.0756          | 0.5510                   | 0.13727104                              | Pass    |
| eFDD 7  | LTE           | 316.2278  | 2535.0          | 0.5738          | 1.0000                   | 0.57376032                              | Pass    |

# OP mode-1

|         | Relative exposure for Secondary transmitter |         |                 |                   |             |  |
|---------|---|---------|-----------------|-------------------|-------------|--|
| OP-Mode | Transmitter                                 | EIRP    | Seq<br>(mW/cm²) | Slin (mW/cm²) Seq |             |  |
|         |   |         | (IIIVV/CIII)    |                   | Clim        |  |
|         |   |         |                 |                   | SLin        |  |
| 2       | Bluetooth                                   | 76.43   | 0.0152          | 1.0000            | 0.015205278 |  |
| 3       | WLAN  | 2000.00 | 0.3979          | 1.0000            | 0.397887694 |  |
| 4       | Bluetooth                                   | 76.43   | 0.0152          | 1.0000            | 0.015205278 |  |
|         | WLAN  | 2000.00 | 0.3979          | 1.0000            | 0.397887694 |  |



# Simultaneous exposure or Primary and Secondary transmitter installed in generic host device with Bluetooth and WLAN

| moduled in generic most device with blactooth and vviz in |             |                    |                                    |   |   |
|---|-------------|--------------------|------------------------------------|---|---|
|   |             |                    | Maximum                            | Maximum<br>S <sub>pri</sub> /S <sub>lim_pri</sub> + | Compliance Maximum (S <sub>pri</sub> /S <sub>lim_pri)</sub> + (S <sub>sec</sub> / |
| OP-Mode   | Transmitter | Frequency<br>(MHZ) | S <sub>eq</sub> / S <sub>Lin</sub> | S <sub>sec</sub> / S <sub>lin_Sec</sub>             | S <sub>lin_Sec)</sub> < 1   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
| 2   | TOBY L200   | 850                | 0.5624                             | 0.5776  | Compliant   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
| 3   | TOBY L200   | 1900               | 0.5858                             | 0.6010  | Compliant   |
|   | WLAN        | 2437               | 0.3979                             |   |   |
| 4   | TOBY L200   | 850                | 0.5624                             | 0.9603  | Compliant   |
|   | WLAN        | 2437               | 0.3979                             |   |   |
| 5   | TOBY L200   | 1900               | 0.5858                             | 0.9837  | Compliant   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
|   | WLAN        | 2437               | 0.3979                             |   |   |
| 6   | TOBY L200   | 850                | 0.5624                             | 0.9755  | Compliant   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
|   | WLAN        | 2437               | 0.3979                             |   |   |
| 7   | TOBY L200   | 1900               | 0.5858                             | 0.9989  | Compliant   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
| 14  | TOBY L200   | 2500               | 0.5738                             | 0.5890  | Compliant   |
|   | WLAN        | 2437               | 0.0152                             |   |   |
| 15  | TOBY L200   | 2500               | 0.5738                             | 0.5890  | Compliant   |
|   | Bluetooth   | 2441               | 0.0152                             |   |   |
|   | WLAN        | 2437               | 0.3979                             |   |   |
| 16  | TOBY L200   | 2500               | 0.5738                             | 0.9869  | Compliant   |

# 3.3.4 Conclusion

When operating the primary transmitter simultaneously with a generic Bluetooth and WLAN radio, the following antenna gains can be used while still complying with the exposure limits.

| dBi  | Band |
|------|------|
| 1.8  | 850  |
| 7.5  | 1900 |
| 10.6 | 2500 |