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Device: MacKay Guardian™ Solo: FCC ID: ZPZ0213MGSOLO

To whom it may concern:

The transmission for the parking meter are expected to be sporadic and limited to short durations for credit card transaction or service requests (a maximum of 400 bytes of data is transmitted which takes a few seconds). The body of users and bystanders are generally not expected to be closer than 20 cm to the meter for an extended duration; for example, more than 30 seconds, when the device is actively transmitting.

The credit card transactions service requests are short duration (typically expected to have a total transmission time of much less than 1 second), additionally credit card-related transmissions are initiated approximately 3 seconds after the card is swiped so the person would typically have moved their hand from the proximity of the device. In accordance with guidance from FCC (included in this applications as a separate exhibit) FCC 2.1091(d)(4) is not required for both body and extremity (hand) exposure and evaluation as a portable device does not need to be considered for this device. RF exposure for this device is being based on mobile RF exposure conditions using an MPE calculation as provided below.

This calculation presents a conservative estimate for the RF exposure from this device as it only takes into consideration the source-based duty cycle and does not also include any additional duty factor corrections for the short duration nature of the transmissions.

Sincerely,

Greg Chauvin,
Director Engineering