

RF EXPOSURE REPORT FCC

APPLICANT

Zipline International Inc.

MODEL NAME

ZFC-P2EV3-0

FCC ID

2BML6P2EV3-0

REPORT NUMBER

HA2603-0033-R02-2

TEST REPORT

Date of Issue

May 04, 2026

Test SiteHCT America, Inc.
840 Yosemite Way, Milpitas, CA 95035, USA

Applicant	Zipline International Inc.
Applicant Address	333 Corey Way, South San Francisco, CA 94080, U.S.A
FCC ID	2BML6P2EV3-0
Model Name	ZFC-P2EV3-0
EUT Type	Module
Modulation Type	OFDM
FCC Classification	Digital Transmission System (DTS)
FCC Rule Part(s)	47 CFR FCC PART C § 15.247/15.205/15.207/15.209
Test Procedure	ANSI C63.10-2020 Corrigendum 1, KDB 558074 D01 v05r02

The device bearing the trade name and model specified above, has been shown to comply with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures required. The results of testing in this report apply only to the product which was tested. Other similar equipment will not necessarily produce the same results due to production tolerance and measurement uncertainties.

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.

HCT America, Inc. certifies that no party to application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C 862

Reviewed and Approved By:**Tested By:**Dan Coronio
Technical ManagerJoe Vang
RF Regulatory Engineer

REVISION HISTORY

The revision history for this document is shown in table.

TEST REPORT NO.	REVISION	DATE	DESCRIPTION
HA2603-0033-R02	0	April 24, 2026	Initial Issue
HA2603-0033-R02-1	1	April 30, 2026	Updated power
HA2603-0033-R02-2	2	May 4, 2026	Updated power and tolerance

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1. EUT DESCRIPTION

Model	ZFC-P2EV3-0	
EUT Type	Module	
Power Supply	48 V	
RF Specification	WIFI 2.4 GHz: 802.11g/11n HT20	
Transmitter Chain	WIFI 2.4: SISO	
Exemption Analysis	☐	1-mW Test Exemptions
	☐	SAR-Based Test Exemptions
	☒	MPE-Based Test Exemptions
Antenna Specification ¹⁾	Antenna Type : Flexible Printed Circuit (FPC) Dipole Peak Gain : 6.5 dBi	
Operating Environment	Indoors and outdoor	
Operating Temperature	-20 °C ~ 50 °C	

Note(s) :

1. Antenna information is based on the document provided.

2. INTRODUCTION

2.1. RF Exposure Exemptions for Single Source

(A) 1-mW Blanket Exemption

Per § 1.1307(b)(3)(i)(A), a single RF source is exempt RF device if the available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption applies to all operating configurations and exposure conditions, for the frequency range 100 kHz - 100 GHz, regardless of fixed, mobile, or portable device exposure conditions. This is a standalone exemption, and it cannot be applied in conjunction with any other test exemption.

(B) SAR-Based Exemption

A more comprehensive exemption, considering a variable power threshold that depends on both the separation distance and power, is provided in § 1.1307(b)(3)(i)(B). This exemption is applicable to the frequency range between 300 MHz - 6 GHz, with test separation distances between 0.5 cm and 40 cm, and for all RF sources in fixed, mobile, and portable device exposure conditions. Accordingly, a RF source is considered an RF exempt device if its available maximum time-averaged (matched conducted) power or its effective radiated power (ERP), whichever is greater, are below a specified threshold (P_{th}).

$$P_{th}(mW) = ERP_{20cm} \left(\frac{d}{20} \right)^x, \text{ where } d \leq 20 \text{ cm}$$

$$P_{th}(mW) = ERP_{20cm}, \text{ where } 20 \text{ cm} < d \leq 40 \text{ cm}$$

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

$$ERP_{20cm}(mW) = 2040 f, \text{ where } 0.3 \text{ GHz} \leq f(\text{GHz}) < 1.5 \text{ GHz}$$

$$ERP_{20cm}(mW) = 3060, \text{ where } 1.5 \text{ GHz} \leq f(\text{GHz}) \leq 6 \text{ GHz}$$

(C) MPE-Based Exemption

MPE-based exemption is provided in the table 1, § 1.1307(b)(3)(i)(C), for a much wider frequency range, from 300 kHz - 100 GHz. The table 1 applies to any RF source (i.e. single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The MPE-based test exemption condition is in terms of ERP, defined as the product of the maximum antenna gain and the delivered maximum time-averaged power.

RF Source Frequency f_L (MHz) – f_H (MHz)	Minimum Distance $\lambda/2\pi$ (f_L) – $\lambda/2\pi$ (f_H)	Threshold ERP (ERP_{th})
0.3 – 1.34	150 m – 35.6 m	1,920 R^2
1.34 – 30	35.6 m – 1.6 m	3,450 R^2 / f^2
30 – 300	1.6 m – 159 mm	3.83 R^2
300 – 1,500	159 mm – 31.8 mm	0.0128 $R^2 f$
1,500 – 100,000	31.8 mm – 0.5 mm	19.2 R^2

Table 1. § 1.1307(b)(3)(i)(C) – Single RF Source Subject to Routine Environmental Evaluation

2.2. RF Exposure Exemptions for Simultaneous Transmission

(A) 1-mW Blanket Exemption

Per § 1.1307(b)(3)(ii)(A), the 1-mW exemption may be also applied to simultaneous transmission conditions, within the same host device, according to one of the following criteria:

- When maximum available power each individual transmits antenna within the same time averaging period is ≤ 1 mW, and the nearest parts of the antenna structures of the simultaneously operating transmitters are separated by at least 2 cm.
- When the aggregate maximum available power of all transmitting antennas is ≤ 1 mW in the same time-averaging period.

This exemption cannot be combined with other options (B) or (C).

(B) SAR-Based Exemptions and MPE-Based Exemptions

As described in § 1.1307(b)(3)(ii)(B) and covers the situations where both SAR-based and MPE-based exemption may be considered for test exemption in fixed, mobile, or portable device exposure conditions. For these cases, a device with multiple RF sources transmitting simultaneously will be considered an RF exempt device if the condition of the following formula is satisfied:

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure\ Limit_k} \leq 1$$

3. RESULT

3.1. MPE-Based Exemptions Calculation

Frequency	2437	MHz		
Separation Distance	0.2	m		
Threshold ERP (ERP _{th})	23.236	W		
Max Conducted Output Power	29	dBm	794.328234724	mW
Antenna Gain	6.5	dBi	4.47	-
EIRP	36.000	dBm	3.981071706	W
ERP	33.850	dBm	2.426610095	W
ERP / ERP _{th} Ratio	0.104431610			

Note:

1. Maximum conducted output power including tune-up tolerance
2. The minimum distance separation has been indicated in the user manual.

3.2. SUMMARY OF RESULTS

Mode	Frequency Range (MHz)	Threshold ERP (ERP _{th}) (W)	ERP (W)	ERP / ERP _{th} Ratio
11n HT20	2437	3.981071706	2.426610095	0.104431610

Sample Calculation

RF Exposure at 20 cm distance = $P / ERP_{th} = 0.005834 / 0.768 = \mathbf{0.007596} < 1.0$

END OF TEST REPORT