

**Portable device**

According to §15.247(e)(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB447498 D01 General RF Exposure Guidance V06

The 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$  for 1-g SAR and  $\leq 7.5$  for 10-g extremity SAR, where:

- $f(\text{GHz})$  is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison

When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion.

**BLE:**

| Modulation | Channel Freq. (GHz) | Conduct ed power (dBm) | Conducte d power (mW) | Tune-up power (dBm) | Max tune-up power (dBm) | Max tune-up power (mW) | Distance (mm) | Result calculation | SAR Exclusion threshold | SAR test exclusion |
|------------|---------------------|------------------------|-----------------------|---------------------|-------------------------|------------------------|---------------|--------------------|-------------------------|--------------------|
| BLE 1M     | 2.402               | 1.82                   | 1.52                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49127            | 3.00                    | YES                |
|            | 2.440               | 1.56                   | 1.43                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49514            | 3.00                    | YES                |
|            | 2.480               | 0.42                   | 1.10                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49918            | 3.00                    | YES                |
| BLE 2M     | 2.402               | 1.72                   | 1.49                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49127            | 3.00                    | YES                |
|            | 2.440               | 1.43                   | 1.39                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49514            | 3.00                    | YES                |
|            | 2.480               | 0.23                   | 1.05                  | 1±1                 | 2                       | 1.58                   | <5            | 0.49918            | 3.00                    | YES                |

**2.4G SRD**

| Modulation | Channel Freq. (GHz) | Conduct ed power (dBm) | Conducte d power (mW) | Tune-up power (dBm) | Max tune-up power (dBm) | Max tune-up power (mW) | Distance (mm) | Result calculation | SAR Exclusion threshold | SAR test exclusion |
|------------|---------------------|------------------------|-----------------------|---------------------|-------------------------|------------------------|---------------|--------------------|-------------------------|--------------------|
| GFSK       | 2.44                | 2.2                    | 1.66                  | 2±1                 | 3                       | 2.00                   | <5            | 0.62334            | 3.00                    | YES                |

**Conclusion:**

For the max result :  $0.62334 \leq 3.0$  for 1g SAR, SAR is not required.

**SIMULTANEOUS TRANSMISSIONS**

BLE and 2.4G SRD cannot transmit simultaneously.

**Signature:**

*Alex Li*

**Date:** 2026-01-23

**NAME AND TITLE** (Please print or type): Alex Li/Manager

**COMPANY** (Please print or type): Shenzhen NTEK Testing Technology Co., Ltd./ No. 24 Xinfa East Road, Xiangshan Community, Xinqiao Street, Baoan District, Shenzhen, Guangdong, People's Republic of China