



February 13, 2026

Test Letter #: 19441-02 REV 0

Applicant: Senseonics, Inc.

Exempt RF Device: Phoenix2 Transmitter

FCC ID: 2AHYA-3402

EUT Summary: The Phoenix2 Transmitter is categorically excluded from SAR testing.

Reference: KDB 447498 DO1 General RF Exposure Guidance v06, Clause 4.3.1(a).

For 100 MHz to 6 GHz and test separation distances of ≤ 50 mm the 1-g, and 10-g, SAR test exclusion thresholds are determined by the following:

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

note: that power and distance shall be rounded to the nearest mW and mm before the calculation. When the minimum separation distance is < 5 mm, a calculation distance of 5mm shall be used.

Final Exclusion Calculation:

The peak conducted power delivered to the antenna port/coil is 0.5W (26.99 dBm).

The worst-case, source-based, duty factor is 16.67% (maximum duty cycle).

$10\text{LOG}(0.1667) = -7.78 \text{ dB}$.

The applicant's tune-up tolerance is ± 1.0 dB at 13.56 MHz.

$26.99\text{dBm} + (-7.78\text{dB}) + 1.0\text{dB} = 20.21 \text{ dBm}$.

$20.21 \text{ dBm} = 104.95 \text{ mW}$ (rounded to 105.0 mW).

$[105\text{mW} \div 5\text{mm}] \times [\sqrt{0.01356\text{GHz}}] = 2.445$ (unitless)

Because 2.445 is less than 3, the EUT complies with the 1-g SAR exclusion.

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