May 25, 2023

FCC ID: 2BA68LC

To whom it may concern,

We, UL Japan, Inc, hereby declare that LiLz Cam, model: LC-10 (FCC ID: 2BA68LC) of LiLz Inc. is exempt from RF exposure SAR evaluation because the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula according to the Code of Federal Regulation title 47 section 1.1307(b)(3)(i)(B). This method is used at separation distances *d* (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive) for single RF sources. P_{th} is given by:

$$P_{th}\ (\mathrm{mW}) = \begin{cases} ERP_{20\ \mathrm{cm}}\ (d\ /\ 20\ \mathrm{cm})^{x} & d \le 20\ \mathrm{cm} \\ ERP_{20\ \mathrm{cm}} & 20\ \mathrm{cm}\ <\ d\ \le\ 40\ \mathrm{cm} \end{cases}$$

Where

$$x = -\log_{10}\left(\frac{60}{ERP_{20\ \mathrm{cm}}\sqrt{f}}\right) \text{and } f \text{ is in GHz}$$

$$ERP_{20\ \mathrm{cm}}\ (\mathrm{mW}) = \begin{cases} 2040f & 0.3\ \mathrm{GHz} \le f < 1.5\ \mathrm{GHz} \\ 3060 & 1.5\ \mathrm{GHz} \le f \le 6\ \mathrm{GHz} \end{cases}$$

When the minimum separation distance is shorter than 0.5 cm, 0.5 cm is applied.

The SAR evaluation exemption threshold is calculated as below.

[Bluetooth (LE)]

Pth (mW)	3060
f (GHz)	2.48
$ERP_{20\ \mathrm{cm}}$ (mW)	3060
d (cm)	20.0

Conducted Power	(dBm)	6.54
	(mW)	4.51
Antenna Gain (dBi)		1.90
EIRP (dBm)		8.44
ERP	(dBm)	6.30
	(mW)	4.27

The Maximum time-averaged power or ERP whichever greater is 4.6 mW.
(Rounded up to two decimals place)

Thank you for your attention to this matter.

S. Matsuyama

Satofumi Matsuyama
Engineer