

Portable device

According to §15.247(e)(i) , § 2.1093 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

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

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

- $f(\text{GHz})$ 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.

For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C of KDB447498 D01):

- 1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100/f(\text{MHz}))]$
- 2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $1/2$
- 3) SAR measurement procedures are not established below 100 MHz.

When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any SAR test results below 100 MHz to be acceptable.

BLE:

Antenna Type: FPC Antenna

Antenna Gain: -2.46 dBi

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 calculatio n	1g SAR Exclusion threshold	SAR test exclusion
BLE(1M)	2.402	-1.96	0.637	-1±1	0.0	1.000	<5	0.30997	3.00	YES
	2.44	-1.91	0.644	-1±1	0.0	1.000	<5	0.31241	3.00	YES
	2.48	-0.84	0.824	-1±1	0.0	1.000	<5	0.31496	3.00	YES
BLE(2M)	2.402	-1.64	0.685	-1±1	0.0	1.000	<5	0.30997	3.00	YES
	2.44	-1.6	0.692	-1±1	0.0	1.000	<5	0.31241	3.00	YES
	2.48	-0.69	0.853	-1±1	0.0	1.000	<5	0.31496	3.00	YES

Transmit power

NFC

Frequency (MHz)	Max Output power (dBuV/m)	EIRP power (dBm)
13.56	59.48	-35.78

$EIRP = E - 104.8 + 20 \log(D)$

Mode	Channel Freq. (MHz)	EIRP power (dBm)	EIRP power (mW)	Tune-up power (dBm)	Max tune-up power (dBm)	Evaluation result (mW)	Power density Limits (mW)
NFC	13.56	-35.78	0.00026	-36±1	-35	0.00000032	442.64

Note: The EUT cannot support simultaneous multiple transmissions.

Conclusion:

For the max result: $0.31496 \leq 3.0$ for 1-g SAR, No SAR is required.

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Signature:

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