



December 14, 2015

UL Japan, Inc.
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FCC ID: ACJ-RP-BTS50

To whom it may concern,

We, UL Japan, Inc. hereby declare that Digital Wireless Stereo Earphones, model: RP-BTS50 (FCC ID: ACJ-RP-BTS50) of Panasonic Corporation is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in KDB 447498D01(v06).

KDB 447498D01(v06) has the following exclusion for portable devices:

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

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})]$

· $[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 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

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

This device has $f = 2.48$ GHz and distance = 5 mm (minimum separation distance: 5 mm was used in the calculation) and the maximum average output power was 1 mW

So for this device:

$1 \text{ mW}[\text{maximum average output power}]/5 \text{ mm}[\text{minimum separation distance}] * \sqrt{2.48} = 0.3$

*This is less than 3.0, so no SAR is required.

Even taking into account the tolerance, this device

Thank you for your attention to this matter.

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UL Japan, Inc.