March 5, 2025

FCC ID: AK8CFIZCT2A

To whom it may concern,

We, UL Japan, Inc, hereby declare that Wireless Controller, model: CFI-ZCT2W (FCC ID: AK8CFIZCT2A) of Sony Interactive Entertainment 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.
For 10-g extremity SAR test exemption, P_{th} is applied a factor of 2.5 to the SAR-based exemption thresholds.

[Bluetooth (BR / EDR) part]

Body

Pth (mW)	10.17
f (GHz)	2.48
ERP $_{20\ \mathrm{cm}}$ (mW)	3060
d (cm)	1.0

Extremity

Pth (mW)	6.78
f (GHz)	2.48
ERP $_{20\ \mathrm{cm}}$ (mW)	3060
d (cm)	0.5

Conducted Power	(dBm)	4.00
	(mW)	2.51
Antenna Gain (dBi)		3.80
EIRP (dBm)		7.80
ERP	(dBm)	5.66
	(mW)	3.68

The Maximum time-averaged power or ERP whichever greater is 3.7 mW.
(Rounded up to two decimals place)

Thank you for your attention to this matter.

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Leader

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