



Sony Global Manufacturing & Operations Corporation EMC/RF Test Laboratory, Main Lab.
8-4 Shiomi Kisarazu-shi Chiba-ken, 292-0834, Japan

Date: March 3, 2022

FCC ID : AK8YY2965
Applicant: Sony Group Corporation

SAR Evaluation Exemption

To whom it may concern,

We, Sony Global Manufacturing & Operations Corporation EMC/RF Test Laboratory, Main Lab., hereby declare that USB Transceiver, model: YY2965 (FCC ID: AK8YY2965) of Sony Corporation is exempt from RF exposure SAR evaluation, as its output power meets the exclusion limits, stated in FCC Part 2 §2.1093.

According to KDB 447498 D01 (v06), section 4.3.1:

... These test exclusion conditions are based on source-based time-averaged (i.e. frame averaged) maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.
... The 1-g 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*

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.

For above device,

Regarding **Bluetooth Low Energy**;

$f = 2.48$ GHz, distance = 5mm,
the max. possible duty cycle = 100 % = 0.00 dB,
the max. possible burst averaged power incl. tune-up tolerance = 4.60 dBm, and
the max. possible frame averaged power incl. tune-up tolerance = $4.60 + (0.00) = 4.60$ dBm
= 2.88 mW ≈ 3 mW.

Therefore,

$3 \text{ mW} / 5 \text{ mm} \cdot (\sqrt{2.48 \text{ GHz}}) = 0.9 < 3.0$
and no SAR evaluation is required.

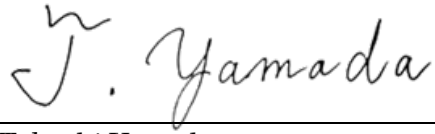
SONY

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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, reading "T. Yamada". The signature is written in a cursive, flowing style. The first letter "T" is large and stylized, with a small flourish above it. The rest of the name "Yamada" is written in a continuous, cursive script.

Takashi Yamada

Technical Manager

EMC/ RF Test Laboratory Main Lab.

Design Technology Division

Sony Global Manufacturing & Operations Corporation