

October 31, 2025

FCC ID: CWT1AEA0001

To whom it may concern,

We, UL Japan, Inc, hereby declare that DK ECU, model: T1AEA0001 (FCC ID: CWT1AEA0001) of ALPS ALPINE CO., LTD. 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:

[LF and NFC part]

The SAR test exclusion thresholds for below 100 MHz at test separation distances > 50 mm and < 200 mm are determined by step c) 1):

c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion:

- 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 $[1 + \log(100 / f(\text{MHz}))]$

(LF)

Numeric exemption threshold:

$P_{th \text{ step c)}}$ [mW]:	2241.70
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Radio specification and use-case for this device are below:

f [MHz]:	0.125
d [mm]:	200
Maximum average output power [mW]:	79

 f [MHz]: Operating frequency d [mm]: Minimum separation distance

Maximum average output power [mW]: timed-average power

(NFC)

Numeric exemption threshold:

$P_{th \text{ step c)}}$ [mW]:	1072.71
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Radio specification and use-case for this device are below:

f [MHz]:	13.56
d [mm]:	200
Maximum average output power [mW]:	296

 f [MHz]: Operating frequency d [mm]: Minimum separation distance

Maximum average output power [mW]: burst-average power

This is less than $P_{th \text{ step c)}}$, so SAR test is exemption for this device.
Even taking into account the tolerance, this device can be satisfied with the limits.

[Bluetooth (LE) part]

The 1g and 10g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances > 50 mm are determined by step b) 2):

$\{[\text{Power allowed at numeric threshold for 50 mm in step a)}] + [(\text{test separation distance} - 50 \text{ mm}) \cdot 10]\}$
mW, for > 1500 MHz and ≤ 6 GHz

Power allowed at numeric threshold for 50 mm in step a: 95.25 mW
[(test separation distance: 200 mm – 50 mm) · 10] mW: 1500 mW

Numeric exemption threshold:

P_{th} step b) [mW]:	1595.25
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Radio specification and use-case for this device are below:

f [MHz]:	2480
d [mm]:	200
Maximum average output power [mW]:	4.37

f [MHz]: Operating frequency

d [mm]: Minimum separation distance

Maximum average output power [mW]: burst-average power

This is less than P_{th} step b), so SAR test is exemption for this device.
Even taking into account the tolerance, this device can be satisfied with the limits.

[Simultaneous transmission evaluation]

Estimated SAR is applied as 0.4 W/kg for 1-g SAR, when the test separation distance is > 50mm for each transmitter.

$$0.4 \text{ W/kg(LF1)} + 0.4 \text{ W/kg(LF2)} + 0.4 \text{ W/kg(NFC)} + 0.4 \text{ W/kg(BLE)} = 1.6 \text{ W/kg} < 1.6 \text{ W/kg(1-g SAR)}$$

Therefore, this device is exempt from the SAR evaluation.

Thank you for your attention to this matter.


Shinichi Miyazono
Leader