

November 17, 2025

FCC ID: DV8LX13002

To whom it may concern,

We, UL Japan, Inc, hereby declare that ECG, Respiration and SpO2 Transmitter, model: LX-1300E (FCC ID: DV8LX13002) of Fukuda Denshi 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:

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

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

$\cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

$\cdot f(\text{GHz})$ is the RF channel transmit frequency in GHz

$\cdot$ Power and distance are rounded to the nearest mW and mm before calculation

$\cdot$ The result is rounded to one decimal place for comparison

The test exclusions are applicable only when the minimum test separation distance is $\leq$ 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.

WMTS part:

This device has $f = 614$ MHz and distance = 5 mm (minimum separation distance: 5 mm was used in the calculation) and the maximum average output power (Burst power average) was 7.9 mW.

BT LE part:

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 (Burst power average) was 3.2 mW.

So for this device:

7.9 mW [maximum average output power]/5 mm [minimum separation distance] $\cdot \sqrt{0.614} = 1.2$ for WMTS part

3.2 mW [maximum average output power]/5 mm [minimum separation distance] $\cdot \sqrt{2.48} = 1$ for BT LE part

*These results are less than 3.0, so no SAR is required.

Even taking into account the tolerance, this device can be satisfied with the limits.

NFC part:

This device's SAR Value: 0.005 W/kg (Limit: 1.6 W/kg)

*Refer to RF EXPOSUR TEST REPORT No. 15886547S.

Simultaneous transmission SAR test exclusion considerations by the KDB 447498D01v06 4.3.2 b)
Estimated SAR Value formula

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})/x}] \text{ W/kg}$, for *test separation distances* $\leq 50 \text{ mm}$;
where $x = 7.5$ for 1-g SAR and $x = 18.75$ for 10-g SAR.

WMTS part: $(7.9 \text{ mW}/5 \text{ mm}) \cdot (\sqrt{0.6139875/7.5}) = 0.17$

BT LE part: $(3.2 \text{ mW}/5 \text{ mm}) \cdot (\sqrt{2.48/7.5}) = 0.13$

Total SAR Value: $0.17(\text{WMTS}) + 0.13(\text{BT LE}) + 0.005(\text{NFC}) = 0.305 \text{ W/kg}$ (Limit: 1.6 W/kg)

Thank you for your attention to this matter.



Toyokazu Imamura
Engineer