

December 16, 2025

FCC ID: MLBHLSS-8A

To whom it may concern,

We, UL Japan, Inc, hereby declare that ECU of 2R SMART SYSTEM, model: HLSS-8A (FCC ID: MLBHLSS-8A) of Minebea AccessSolutions Inc. 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 SAR test exclusion thresholds for below 100 MHz at test separation distances ≤ 50 mm are determined by step c) 2):

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 $[1 + \log(100 / f(\text{MHz}))]$
- 2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$

Numeric exemption threshold:

P_{th} step c) [mW]:	925.69
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Radio specification and use-case for this device are below:

f [MHz]:	0.125
d [mm]:	0
Maximum peak output power [mW]:	1.69

f [MHz]: Operating frequency

d [mm]: Minimum separation distance

Maximum peak output power [mW]: burst power

This is less than P_{th} step c), so SAR test is exemption for this device.

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

Thank you for your attention to this matter.



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Leader