

Portable device

According to §15.247(e)(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB447498 D01 General RF Exposure Guidance V05

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:

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

$[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 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.

We use 5mm as separation distance to calculated.

Maximum measured transmitter power:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up power(dBm)	Result calculation	1-g SAR
2.402	GFSK	-3.770	-4.5 ± 1	-3.5	0.0021	3.00
2.441	GFSK	-4.441	-4.5 ± 1	-3.5	0.0018	3.00
2.480	GFSK	-5.305	-4.5 ± 1	-3.5	0.0015	3.00
2.402	$\pi/4$ -DQPSK	-4.323	-5 ± 1	-4	0.0019	3.00
2.441	$\pi/4$ -DQPSK	-5.071	-5 ± 1	-4	0.0016	3.00
2.480	$\pi/4$ -DQPSK	-5.940	-5 ± 1	-4	0.0013	3.00
2.402	8-DPSK	-5.468	-6.2 ± 1	-5.2	0.0014	3.00
2.441	8-DPSK	-6.301	-6.2 ± 1	-5.2	0.0012	3.00
2.480	8-DPSK	-7.128	-6.2 ± 1	-5.2	0.0010	3.00

Conclusion:

For the max result $0.0021 \leq 3.0$ for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

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