RF EXPOSURE EVALUATION

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Applicable Standard

According to FCC §2.1093 and §1.1307(b) (1), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

According to KDB 447498 D01 General RF Exposure Guidance v06.

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:
[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] •
[√ f(GHz)] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where
1. f(GHz) is the RF channel transmit frequency in GHz.
2. Power and distance are rounded to the nearest mW and mm before calculation.
3. The result is rounded to one decimal place for comparison.
4. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test Exclusion.

Measurement Result

For worst case:

Mode	Frequency (MHz)	Max tune-up conducted power# (dBm)	Max tune-up conducted power# (mW)	Distance (mm)	Calculated value	Threshold (1-g SAR)	SAR Test Exclusion
BLE	2402-2480	2.0	1.58	5	0.5	3.0	**Yes**

Result: Compliant

SAR EXEMPTION LIMITS

Applicable Standard

According to RSS-102 Issue 6 § (6.3), Devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table 11, based on the separation distance, are exempt from SAR evaluation. The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply.

Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance

Frequency (MHz)	≤ 5 mm (mW)	10 mm (mW)	15 mm (mW)	20 mm (mW)	25 mm (mW)	30 mm (mW)	35 mm (mW)	40 mm (mW)	45 mm (mW)	> 50 mm (mW)
≤ 300	45	116	139	163	189	216	246	280	319	362
450	32	71	87	104	124	147	175	208	248	296
835	21	32	41	54	72	96	129	172	228	298
1900	6	10	18	33	57	92	138	194	257	323
2450	3	7	16	32	56	89	128	170	209	245
3500	2	6	15	29	50	72	94	114	134	158
5800	1	5	13	23	32	41	54	74	102	128

The exemption limits in table 11 are based on measurements and simulations of half-wave dipole antennas at separation distances of 5 mm to 50 mm from a flat phantom, which provides a SAR value of approximately 0.4 W/kg for 1 g of tissue.

For limb-worn devices where the 10 gram of tissue applies, the exemption limits for routine evaluation in table 11 are multiplied by a factor of 2.5.

For controlled-use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in table 11 are multiplied by a factor of 5.

When the operating frequency of the device is between two frequencies located in table 11, linear interpolation shall be applied for the applicable separation distance. If the separation distance of the device is between two distances located in table 11, linear interpolation may be applied for the applicable frequency. Alternatively, the limit corresponding to the smaller distance may be employed. For example, in case of a 7 mm separation distance, either use the exception value for a 5 mm separation distance or interpolate between the limits corresponding to 5 mm and 10 mm separation distances.

For implanted medical devices, the exemption limit for routine SAR evaluation is set at an output power of 1 mW, regardless of frequency.

The SAR levels from exempted transmitters shall be included in the compliance assessment and the determination of the TER. Detailed guidance is included in sections 7.1.8 and 8.2.2.1.

Test Result:

For worst case:

Mode	Frequency (MHz)	Gain# (dBi)	Max tune-up conducted power# (dBm)	Max tune-up EIRP# (dBm)	Max tune-up EIRP# (mW)	Distance (mm)	Exemption Limit (mW)	SAR Evaluation Exemption
BLE	2402-2480	1.18	2.0	3.18	2.08	5	2.97	Yes

Note 1: (2480-2450)/(3500-2450)= (3-P)/(3-2), the exemption limit of 2480MHz is P= 2.97 mW
Note 2: The max tune-up conducted power# and antenna gain# were declared by the applicant