

April 22, 2024

FCC ID: 2A29TITSHRW110S2404

To whom it may concern,

We, UL Japan, Inc, hereby declare that HF Band RFID Reader/Writer, model: ITS-HRW110 (FCC ID: 2A29TITSHRW110S2404) of NITTOKU 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 SAR test exclusion thresholds for below 100 MHz at test separation distances  $\leq 50$  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  $\leq 50$  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:

$P_{th \text{ step c)}} [\text{mW}]$ :	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]:	250

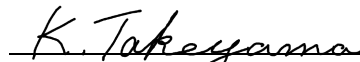
$f$  [MHz]: Operating frequency

$d$  [mm]: Minimum separation distance

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

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

Thank you for your attention to this matter.

  
Kazutaka Takeyama  
Leader