
7th December 2022

Telecommunication Certification Body
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To whom it may concern

RF Exposure Analysis – SAR Test Exemption – sugarBEAT

FCC ID: 2A8VFAA

The sugarBEAT equipment operates using 2.4GHz BT LE

The following FCC Rule Parts are applicable:

Part 2.1093 – Radiofrequency radiation exposure evaluation: portable devices

Part 1.1307(b)(3)(i)(A) - Blanket RF exposure exemption (i)

Part 1.1307(b)(3)(i)(C) - MPE-based test exemption (ii)

Part 1.1307(b)(3)(i)(B) - SAR-based test exemption (iii)

and:

KDB447498 D04 - RF Exposure Procedures and Equipment Authorization Policies for
Mobile and Portable Devices

For the sugarBEAT

BT Operating Frequency: 2402 – 2480MHz

Tx Power_{max} Conducted: -3.0 dBm

Antenna gain +0.5dBi

EIRP = -2.5 dBm

ERP = -2.5-2.15dBm = -4.65 dBm (0.34 mW)

Evaluation

From Part 2.1093(c)(1). RF exemption applies if the maximum transmitted power is less than the maximum of the following three criteria:

- i) Less than 1 mw Blanket exemption. $P_{TH} = 0.001 \text{ W}$ – §1.1307(b)(3)(i)(A)
- ii) determination of exemption under the MPE-based §1.1307(b)(3)(i)(C), if i) not met
- iii) determination of exemption under the SAR-based §1.1307(b)(3)(i)(B) if both i) and ii) are not met

Conclusion

The sugarBEAT source-based, time-averaged power is less than 1mW, so complies with the RF exposure blanket exemption in accordance with §1.1307(b)(3)(i)(A).

Yours faithfully,



Kevin Powell,
Senior Software and Electronics Engineer