



September 5, 2014

UL Japan, Inc.  
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FCC ID: 2ACS48600043

To whom it may concern,

We, UL Japan, Inc. hereby declare that Heart rate Sensor, model: WHS-2 (FCC ID: 2ACS48600043) of UNION TOOL CO. is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in KDB 447498D01(V05).

KDB 447498D01(V05) has the following exclusion for portable devices:

The 1g and 10g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  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  $\leq 7.5$  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  $\leq 50$  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.

This device has  $f = 2.48$  GHz and distance = 5 mm (minimum separation distance: 5mm was used in the calculation) and the maximum tune-up tolerance limit was 2 mW.

So for this device:

$2 \text{ mW}[\text{maximum tune-up tolerance limit}]/5 \text{ mm}[\text{minimum separation distance}] \cdot \sqrt{2.48} = 0.6$

\*This is less than 3.0, so no SAR is required.

Thank you for your attention to this matter.

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UL Japan, Inc.