

The device has a standalone transmission.

According to KDB 447498 section 4.3.1, the 1-g SAR test exclusion thresholds at test separation distances  $\leq$  50 mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$

For Bluetooth:

The maximum tune-up limit power is 0.874mW mW @ 2.480GHz

For the head and body SAR, use 5mm as the conservative minimum test separation distance,  
 $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] = 0.874/50 * \text{SQRT}(2.480) = 0.027 \leq 3.0$

For FM Transmitter:

The maximum tune-up limit power is 0.174mW @ 98.1MHz

For the head and body SAR, use 5mm as the conservative minimum test separation distance,  
 $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] = 0.174/50 * \text{SQRT}(0.0981) = 0.001 \leq 3.0$

So standalone SAR measurements are not required for both head and body.