

FCC ID: 2ADSI-HUGONX8252

Portable device

According to §15.247(e)(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB447498 D01 General RF Exposure Guidance V05

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:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})]^*$

$[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 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 ≤ 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.

We use 5mm as separation distance to calculate.

Maximum measured transmitter power:

BT DSS:

| Transmit Frequency (GHz) | Mode | Measured Power (dBm) | Tune-up power (dBm) | Max tune-up power(dBm) | Result calculation | 1-g SAR |
|--------------------------|----------------|----------------------|---------------------|------------------------|--------------------|---------|
| 2.402 | GFSK | 0.262 | -3~+1 | +1 | 0.3902 | 3.0 |
| 2.441 | GFSK | -1.013 | -3~+1 | +1 | 0.3934 | 3.0 |
| 2.480 | GFSK | -2.481 | -3~+1 | +1 | 0.3965 | 3.0 |
| 2.402 | $\pi/4$ -DQPSK | 0.850 | -3~+1 | +1 | 0.3902 | 3.0 |
| 2.441 | $\pi/4$ -DQPSK | -0.490 | -3~+1 | +1 | 0.3934 | 3.0 |
| 2.480 | $\pi/4$ -DQPSK | -1.979 | -3~+1 | +1 | 0.3965 | 3.0 |
| 2.402 | 8DPSK | 1.259 | -3~+1 | +1 | 0.3902 | 3.0 |
| 2.441 | 8DPSK | 0.026 | -3~+1 | +1 | 0.3934 | 3.0 |
| 2.480 | 8DPSK | -1.492 | -3~+1 | +1 | 0.3965 | 3.0 |

Conclusion:

For the max result : $0.3965 \leq 3.0$ for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

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