

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:

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

The maximum tune-up limit power is -3.93dBm (0.40mW) @ 2.442GHz

For the head and body SAR, use 5mm as the conservative minimum test separation distance,

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] = 0.125 \leq 3.0$$

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