

RF Exposure statement

TÜV SÜD Zacta Ltd.
4149-7 Hachimanpara 5-chome
Yonezawa-shi, Yamagata 992-1128 Japan

To whom it may concern:

TÜV SÜD Zacta is authorized as an agency from **Applicant: Telepathy Japan Inc. (FCC ID: 2AF83TPC008)** to act on their behalf in all matters relating to applications for equipment authorization, including testing the device and the signing of all documents relating to these matters.

1. TEST METHODOLOGY

All calculations were made in accordance with FCC Part 2.1091, 2.1093 and KDB 447498 D01 v06.

- References

All measurements were made as documented in test reports JPD-TR-16003-0 and JPD-TR-16004-0 for operation in the 2.4GHz band.

2. STANDALONE SAR TEST EXCLUSION CONSIDERATIONS

FCC RULES

SAR test exclusion in accordance with KDB 447498.

The 1-g and 10-g SAR test exclusion thresholds for 100MHz to 6GHz 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.

SAR Exclusion Calculations Table for Portable Devices (separation distance < 20cm)

Antenna	Tx	Frequency (GHz)	Avg Output power		Separation distance (mm)	Calculated Threshold
			dBm	mW		
WLAN/BT	11b	2.462	8.5	7.08	5	2.2
WLAN/BT	11g	2.462	8.0	6.31	5	2.0
WLAN/BT	BT LE	2.480	6.5	4.47	5	1.4

Conclusion:

The computed values are < 3; therefore, WLAN and Bluetooth qualify for Standalone SAR test exclusion.