

## **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  $\leq 50$  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.

We use 5mm as separation distance to calculated.

Maximum measured transmitter power:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up power(dBm)	Result calculation	1-g SAR
2.402	GFSK	2.499	2±1	3	0.618	3.00
2.441	GFSK	3.826	3±1	4	0.785	3.00
2.480	GFSK	3.502	3±1	4	0.791	3.00
2.402	$\pi/4$ -DQPSK	0.225	0±1	1	0.390	3.00
2.441	$\pi/4$ -DQPSK	2.005	2±1	3	0.623	3.00
2.480	$\pi/4$ -DQPSK	1.590	1±1	2	0.499	3.00
2.402	8-DPSK	0.817	0±1	1	0.390	3.00
2.441	8-DPSK	2.606	2±1	3	0.623	3.00
2.480	8-DPSK	2.231	2±1	3	0.628	3.00
2.402	GFSK	3.937	3±1	4	0.779	3.00
2.440	GFSK	4.551	4±1	5	0.988	3.00
2.480	GFSK	4.159	4±1	5	0.996	3.00

### **Conclusion:**

For the max result  $0.996 \leq 3.0$  for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

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