

5. RF EXPOSURE EVALUATION

5.1 FCC SAR test exclusion

5.1.1 Applicable Standard

According to §15.247(i) and §1.1310, systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

According to KDB447498 D01 General RF Exposure Guidance v06:

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:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ 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
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

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 according to 5) in section 4.1 is applied to determine SAR test exclusion.

5.1.2 Measurement Result

For BLE:

The max conducted power including tune-up tolerance is 5.0 dBm (3.16 mW).

$[(\text{max. power of channel, mW})/(\text{min. test separation distance, mm})][\sqrt{f(\text{GHz})}]$
 $= 3.16/5 \cdot (\sqrt{2.480}) = 1.0 < 3.0$

Result: Compliant. The stand-alone SAR evaluation is not necessary.

5.2 Exemption limits for Routine Evaluation – SAR Evaluation

5.2.1 Applicable Standard

According to RSS-102 § (2.5.1):

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5.

Table 1: SAR evaluation – Exemption limits for routine evaluation based on frequency and separation distance⁴⁵

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤ 5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤ 300	71 mW	101 mW	132 mW	162 mW	193 mW
450	52 mW	70 mW	88 mW	106 mW	123 mW
835	17 mW	30 mW	42 mW	55 mW	67 mW
1900	7 mW	10 mW	18 mW	34 mW	60 mW
2450	4 mW	7 mW	15 mW	30 mW	52 mW
3500	2 mW	6 mW	16 mW	32 mW	55 mW
5800	1 mW	6 mW	15 mW	27 mW	41 mW

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥ 50 mm
≤ 300	223 mW	254 mW	284 mW	315 mW	345 mW
450	141 mW	159 mW	177 mW	195 mW	213 mW
835	80 mW	92 mW	105 mW	117 mW	130 mW
1900	99 mW	153 mW	225 mW	316 mW	431 mW
2450	83 mW	123 mW	173 mW	235 mW	309 mW
3500	86 mW	124 mW	170 mW	225 mW	290 mW
5800	56 mW	71 mW	85 mW	97 mW	106 mW

5.2.2 Measurement Result:

For BLE:

The max tune-up conducted power is 5.0 dBm (3.16 mW), Antenna Gain: -2.54 dBi,
EIRP: 2.46 dBm (1.76mW)

For limb-worn devices, the exemption power (P) limits for routine evaluation in 2402-2480MHz is:
 $(2480-2450)/(3500-2450)=(P-4)/(2-4)$

$$\Rightarrow 2.5 \times P = 2.5 \times 3.94 = 9.85 \text{ mW}$$

$$> 1.76 \text{ mW}$$

So the stand-alone SAR evaluation can be exempted.