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**FCC§15.247 (i), §1.1307(b)(3)(i)(B)& §2.1093 - SAR-BASED EXEMPTION**

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**Applicable Standard**

According to FCC §2.1093 and §1.1307(b)(3)(i)(B)

According to KDB 447498 D04 Interim General RF Exposure Guidance v01

This exemption is applicable to the frequency range between 300 MHz and 6 GHz, with test separation distances between 0.5 cm and 40 cm, and for all RF sources in fixed, mobile, and portable device exposure conditions.

Accordingly, a RF source is considered an RF exempt device if its available maximum time averaged (matched conducted) power or its effective radiated power (ERP), whichever is greater, are below a specified threshold. This exemption threshold was derived based on general population 1-g SAR requirements and is detailed in Appendix C.

Either SAR-based or MPE-based exemption may be considered for test exemption for fixed, mobile, or portable device exposure conditions; therefore, the contributions from each exemption in conjunction with the measured SAR (Evaluated term) shall be used to determine exemption for simultaneous transmission according to Formula (C.1) [repeated from § 1.1307(b)(3)(ii)(B)].

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of  $\lambda/4$ .

As for devices with antennas of length greater than  $\lambda/4$  where the gain is not well defined, but always less than that of a half-wave dipole (length  $\lambda/2$ ), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of § 1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold  $P_{th}$  (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive).  $P_{th}$  is given by Formula (B.2).

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d/20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases} \quad (\text{B.2})$$

where

$$x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right)$$

and  $f$  is in GHz,  $d$  is the separation distance (cm), and  $ERP_{20 \text{ cm}}$  is per Formula (B.1). The example values shown in Table B.2 are for illustration only.

Table B.2—Example Power Thresholds (mW)

Frequency (MHz)	Distance (mm)										
		5	10	15	20	25	30	35	40	45	50
	300	39	65	88	110	129	148	166	184	201	217
	450	22	44	67	89	112	135	158	180	203	226
	835	9	25	44	66	90	116	145	175	207	240
	1900	3	12	26	44	66	92	122	157	195	236
	2450	3	10	22	38	59	83	111	143	179	219
	3600	2	8	18	32	49	71	96	125	158	195
	5800	1	6	14	25	40	58	80	106	136	169

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases} \quad (\text{B.1})$$

$$\sum_{i=1}^a \frac{P_i}{P_{th,i}} + \sum_{j=1}^b \frac{ERP_j}{ERP_{th,j}} + \sum_{k=1}^c \frac{Evaluated_k}{Exposure \text{ Limit}_k} \leq 1 \quad (\text{C.1})$$

- $a$  number of fixed, mobile, or portable RF sources claiming exemption using the § 1.1307(b)(3)(i)(B) formula for  $P_{th}$ , including existing exempt transmitters and those being added.
- $b$  number of fixed, mobile, or portable RF sources claiming exemption using the applicable § 1.1307(b)(3)(i)(C) Table 1 formula for Threshold ERP, including existing exempt transmitters and those being added.
- $c$  number of existing fixed, mobile, or portable RF sources with known evaluation for the specified minimum distance.
- $P_i$  the available maximum time-averaged power or the ERP, whichever is greater, for fixed, mobile, or portable RF source  $i$  at a distance between 0.5 cm and 40 cm (inclusive).
- $P_{th,i}$  the exemption threshold power ( $P_{th}$ ) according to the § 1.1307(b)(3)(i)(B) formula for fixed, mobile, or portable RF source  $i$ .
- $ERP_j$  the available maximum time-averaged power or the ERP, whichever is greater, of fixed, mobile, or portable RF source  $j$ .
- $ERP_{th,j}$  exemption threshold ERP for fixed, mobile, or portable RF source  $j$ , at a distance of at least  $\lambda/2\pi$ , according to the applicable § 1.1307(b)(3)(i)(C) Table 1 formula at the location in question.
- $Evaluated_k$  the maximum reported SAR or MPE of fixed, mobile, or portable RF source  $k$  either in the device or at the transmitter site from an existing evaluation.
- $Exposure \text{ Limit}_k$  either the general population/uncontrolled maximum permissible exposure (MPE) or specific absorption rate (SAR) limit for each fixed, mobile, or portable sources, as applicable

The sum of the ratios of the applicable terms for SAR-based, MPE-based and measured SAR or MPE shall be less than 1, to determine simultaneous transmission exposure compliance.

**Measurement Result****For worst case:**

Radio	Frequency (MHz)	Distance (mm)	P <sub>th</sub> (mW)	Maximum Conducted Power including Tune-up Tolerance (dBm)	Antenna Gain (dBi)	The Greater of Conducted Power	
						dBm	mW
BLE	2402-2480	5	2.72	2	1.62	2	1.58

Note: Max tune-up conducted power<sup>#</sup> and antenna gain<sup>#</sup> was declared and provided by the applicant

**Result: Compliant**