FCC ID: 2AXP2-OWL31

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 V06
The 1-g SAR and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:
[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)]·[√f(GHZ)] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where:

- f(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

When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.

Modulation	Channel Freq. (GHz)	Conducted power (dBm)	Conducted power (mW)	Tune-up power (dBm)	Max tune-up power (dBm)	Max tune-up power (mW)	Distance (mm)	Result calculation	SAR Exclusion threshold	SAR test exclusion
BLE 1M	2.402	-3.18	0.48	-4±1	-3	0.50	<5	0.15535	3.00	YES
	2.440	-4.61	0.35	-4±1	-3	0.50	<5	0.15658	3.00	YES
	2.480	-3.42	0.45	-4±1	-3	0.50	<5	0.15785	3.00	YES
GFSK	2.403	-2.78	0.53	-3±1	-2	0.63	<5	0.19562	3.00	YES
	2.445	-3.99	0.40	-3±1	-2	0.63	<5	0.19732	3.00	YES
	2.480	-2.91	0.51	-3±1	-2	0.63	<5	0.19873	3.00	YES

Conclusion:
For the max result : 0.19732 ≤ 3.0 for 1g SAR, SAR is not required.

Signature: **Date:** 2025-07-24

Alex Li

NAME AND TITLE (Please print or type): Alex Li/Manager

COMPANY (Please print or type): Shenzhen NTEK Testing Technology Co., Ltd./ No. 24 Xinfa East Road, Xiangshan Community, Xinqiao Street, Baoan District, Shenzhen, Guangdong, People's Republic of China