



October 1, 2024

Test Letter #: 18922-01 REV 0 (Created with Reference to WL Report # 18921)

Applicant: Perin Health Devices, LLC (Phase Margin, Inc.)

Exempt RF Device, FCC ID: 2BKSW-PHP-0124

EUT Summary: The Perin Health Patch (FCC ID: 2BKSW-PHP-0124) is categorically excluded from SAR testing.

Time-Averaged Exclusion Threshold for FCC:

Reference: KDB 447498 DO1 General RF Exposure Guidance v06. -- SAR evaluation for general population exposure conditions, by measurement or simulation, is not required when the corresponding SAR Test Exclusion Threshold condition(s), listed below, are satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions.

In accordance with Section 4.3.1, of the referenced document, the following formula may be used to calculate the exclusion of SAR Testing for a stand-alone device:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f_{(\text{GHz})}}] \leq 3.0 \text{ for 1-g SAR, and } \leq 7.5 \text{ for 10-g extremity SAR}$$

where,

- a) $f_{(\text{GHz})}$ is the RF channel transmit frequency in GHz
- b) power and distance shall be rounded to the nearest mW and mm before calculation.
- c) the result is rounded to the nearest mW and mm before calculation.
- d) when the minimum test separation distance is < 5mm, a distance of 5mm is used
- e) the values of 3.0 and 7.5 are the final numerical thresholds, these values are unitless.



EUT Transmitter Details:

The EUT has a peak output power, conducted at the antenna port, that measured -4.387 dBm.

The manufacturer has declared a tune-up tolerance of ± 1.0 dB.

as such,

$$-4.387 \text{ dBm} + 1.0 \text{ dB} = -3.387 \text{ dBm (peak, conducted)}$$

therefore,

$$-3.387 \text{ dBm} = 0.46 \text{ mW (shall be rounded to 1 mW).}$$

1 mW = maximum power of RF the channel, adjusted for tune-up tolerance

Exclusion Results for FCC:

$$(1\text{mW} \div 5\text{mm}) \cdot (\sqrt{2.48\text{GHz}}) = 0.315$$

finally,

because 0.315 is less than 3.0, the EUT is categorically excluded from SAR testing.