

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 TCB Exclusions list, no SAR required if power is lower than the flowing threshold:

Bluetooth

Frequency Range		Center frequency (MHz)	60/f SAR Limitation (mW)
Low Frequency (MHz)	High Frequency(MHz)		
2402	2480	2441	25

Maximum measured transmitter power: Basic Rate mode

Conducted Power (mW)	Max Antenna Gain (dBi)	EIRP (mW)
0.6310	2.64	1.1588

Maximum measured transmitter power: EDR test mode

Conducted Power (mW)	Max Antenna Gain (dBi)	EIRP (mW)
0.8913	2.64	1.6368

Threshold at which no SAR required is 25 mW.

Maximum Tx power is 1.6368mW EIRP.

Conclusion: No SAR is required.

No Simultaneous transmission occurs.