

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:

RFID

Frequency Range		Center frequency (MHz)	60/f SAR Limitation (mw)
Low Frequency (MHz)	High Frequency(MHz)		
902.75	927.25	915.25	66.67

Maximum measured transmitter power:

Average Source Based Calculated Power (mw)
55.02

Threshold at which no SAR required is 66.67 mw.

Average Source Based Calculated Power is 55.02mW.

Conclusion: No SAR is required.

Bluetooth

Frequency Range		Center frequency (MHz)	60/f SAR Limitation (mw)
Low Frequency (MHz)	Low Frequency(MHz)		
2402	2480	2441	24.58

Maximum measured transmitter power:

Conducted Power (mw)	Max Antenna Gain (dBi)	EIRP (mw)
0.79	2	1. 26

Threshold at which no SAR required is 24.58 mw.

Maximum Tx power is 1.26 mw EIRP.

Conclusion: No SAR is required.

SIMULTANEOUS TRANSMISSION EVALUATION

EUT has meet KDB447498 (3)(b)(ii)(1) requirement so that No Simultaneous SAR is required.

(a) Antennas separation is at least 5 cm.

(b) Sum of 1-g SAR is less than 1.6W/KG for all simultaneous transmitting antennas pair.

(c) Output Power is < 60/f_(GHz) for any simultaneous transmitting antenna for which stand alone SAR is not required.