No SAR justification

The device is measured 193.1x79.7x54.9 mm and it became even big when thermal paper is loaded under normal work condition. The device is specific designed for using on countertop for fee processing and normally seat on countertop when it is not in use and is not suitable for body worn application. Regarding to the hand SAR issue, per KDB 447498, SAR is required only if average SAR excess 1000*[f(GHz)]^{-0.5}. Although, peak average output power for this device is rated at 1738mw max for 850M band and 813mw max for 1900M band. However, the actual output power adjusted after considering that the device is a class 12 for GSM/GPRS and it can use only 4 out of 8 slots max. Beside the product transmit only shortly once per few minutes. Accordingly, the average output power for this device is way below the SAR test threshold defined in KDB 447498. Accordingly, SAR evaluation is not applicable to this product.

