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 KDB 447498 (2)(a)(i)

For portable device,the power limit is 60/f(in GHz) mW

For limit 60/f is equal:

60/2.412=24.87mW

60/2.437=24.62 mW

60/2.462=24.37mW

Maximum measured transmitter power

Model	MAX Conducted Power (dBm)	Max Antenna Gain (dBi)	EIRP (mW)	Limit EIRP (mW)
802.11b	10.84	2	19.95	24.87
802.11g	7.85	2	10	24.37

The max.output power E.I.R.P is 19.95mW<24.87mW

For the Tune Up information from the applicant, the maximum output power is 11 dBm and 8 dBm for 11b and 11g mode, so the worst case of Conducted Power and EIRP will be still less than FCC SAR exemption threshold.

Conclusion: No SAR is required.