



November 26, 2024

FCC ID: PENAD10

To whom it may concern,

We, UL Japan, Inc, hereby declare that UWB/NFC Module, model: AD10 (FCC ID: PENAD10) of AISIN CORPORATION is exempt from RF exposure SAR evaluation as its output power meets the 1-mW test exemption threshold stated in the Code of Federal Regulation title 47 section 1.1307(b)(3)(i)(A).

UWB part:

This device available maximum time-averaged power is 0.05 mW, so no other assessment is required.

Reference of average Power [EIRP]

EIRP specification value: -41.3 dBm/MHz = 0.00007413 mW/MHz

99 % occupied bandwidth = 628.699 MHz

$0.00007413 \text{ [mW/MHz]} \times 628.699 \text{ [MHz]} = \textbf{0.04660546 [mW]}$

NFC part:

This device available maximum time-averaged power is 0.001 mW, so no other assessment is required.

Reference average Power [EIRP]

EIRP: **0.0014693 mW**

The EIRP was derived from a field strength measurement of the fundamental signal which was converted to an EIRP using the free space equation $P(\text{EIRP}) = (E^*d)^2 / 30$

66.9 dB μ V/m at 3m = 0.00221309 V/m

$(0.00221309 \text{ V/m} \times 3\text{m}) (0.00221309 \text{ V/m} \times 3\text{m})/30 = 0.0000014693 \text{ W (0.0014693 mW)}$

Evaluation for multiple RF sources given by the Code of Federal Regulation title 47 section

1.11307(b)(3)(ii)(A):

The device of UWB maximum time-averaged power is 0.05 mW.

The device of NFC maximum time-averaged power is 0.001 mW.

$0.05 \text{ mW} + 0.001 \text{ mW} = 0.051 \text{ mW} < 1 \text{ mW.}$

Thank you for your attention to this matter.

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