

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:

BT

Frequency Range		Center Frequency [MHz]	60/f SAR Limitation [mW]
Low Frequency [MHz]	High Frequency [MHz]		
2 402	2 480	2 441	24.58

Maximum measured transmitter power:

Type of Modulation	Output Power		Max Antenna Gain [dBi]	EIRP [mW]
	[dBm]	[mW]		
GFSK	6.67	4.65	-3.00	2.33
8DPSK	5.07	3.21	-3.00	1.61

Conclusion: No Stand Alone SAR is required.