

INSULET CORPORATION

SAR EXCLUSION EVALUATION

REPORT

SCOPE OF WORK

SAR Exclusion Evaluation on Omnipod 5 with Orion Pod

REPORT NUMBER

105948073BOX-001.FCCMPE.Rev1

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SAR EXCLUSION EVALUATION REPORT

(FULL COMPLIANCE)

Report Number: 105948073BOX-001.FCCMPE.Rev1
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Report Issue Date: December 20, 2024
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Model(s) Tested:

Standards: FCC Part 1.1310 (12/23)
FCC KDB Publication 447498 D01 v06
ISED RSS-102 Issue 6 December 15, 2023

Tested by:
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1 Introduction and Conclusion

This evaluation report covers for a mobile device subject to routine environmental evaluation for RF exposure. A mobile device is defined as a transmitting device designed to generally be used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's radiating structure(s) and the body of the user or nearby persons.

The evaluation indicated in section 2.0 were performed on the product constructed as described in section 4.0. The remaining sections are the verbatim text from the actual evaluation during the investigation. These sections include the evaluation name, the specified Method, and Results. No additions, deviations, or exclusions have been made from the standard(s) unless specifically noted.

Based on the results of our investigation, we have concluded the product evaluated **complies** with the requirements of the standard(s) indicated. The results obtained in this report pertain only to the item(s) evaluated. Intertek does not make any claims of compliance for samples or variants which were not evaluated.

2 Evaluation Summary

| Section | Test full name | Result |
|---------|--|-----------|
| 3 | Client Information | - |
| 4 | Description of Equipment Under Evaluation and Variant Models | - |
| 5 | SAR Exclusion Evaluation FCC KDB Publication 447498 D01 v06 ISED RSS-102 Issue 6 December 15, 2023 | Compliant |
| 6 | Revision History | - |

3 Client Information

This EUT was tested at the request of:

Client: Insulet Corporation
100 Nagog Park
Acton, MA 01720
USA

Contact: Rachel Zhang
Telephone: 978.600.7000
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4 Description of Equipment Under Test and Variant Models

Manufacturer:

Insulet Corporation
100 Nagog Park
Acton, MA 01720
USA

Description of Equipment Under Test (provided by client)

The EUT is the Insulin Delivery Pod

Equipment Under Test Power Configuration

| Rated Voltage | Rated Current | Rated Frequency | Number of Phases |
|------------------|---------------|-----------------|------------------|
| Internal battery | N/A | N/A | N/A |

Variant Models:

The following variant models have been identified by the manufacturer as being electrically identical models, depopulated models, or with reasonable similarity to the model(s) tested. Intertek does not make any claims of compliance for samples or variants which were not tested.

None

5 SAR Exclusion Evaluation

FCC SAR Test Exclusion Thresholds (FCC KDB Publication 447498 D01 v06):

For 100 MHz to 6 GHz and *test separation distances* \leq 50 mm, the 1-g and 10-g *SAR test exclusion thresholds* are determined by the following:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f_{(\text{GHz})}}] \leq 3.0$ for 1-g SAR, and ≤ 7.5 for 10-g extremity SAR,³⁰ where

- $f_{(\text{GHz})}$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation³¹
- The result is rounded to one decimal place for comparison
- The values 3.0 and 7.5 are referred to as *numeric thresholds* in step b) below

The test exclusions are applicable only when the minimum *test separation distance* is \leq 50 mm, and for transmission frequencies between 100 MHz and 6 GHz. When the minimum *test separation distance* is $<$ 5 mm, a distance of 5 mm according to 4.1 f) is applied to determine SAR test exclusion.

Calculation:

$$\text{SAR Test Exclusion Thresholds} = [1.33\text{mW}/5\text{mm}] * [\sqrt{2.440\text{GHz}}] = 0.42$$

| Cond. Power | Cond. Power | Antenna Gain | EIRP Power | EIRP Power | Min Separation Distance | Frequency | SAR Test Exclusion Thresholds For 1-g SAR | SAR Test Exclusion Thresholds \leq 7.5 For 10-g Extremity SAR | Test Result |
|-------------|-------------|--------------|------------|------------|-------------------------|-----------|---|---|-------------|
| (dBm) | (mW) | (dBi) | (dBm) | (mW) | (mm) | GHz | ≤ 3.0 | ≤ 7.5 | |
| 1.25 | 1.33 | 1.1 | 2.35 | 1.72 | 5 | 2.440 | 0.42 | 0.42 | Compliant |

Note: The maximum conducted power of 1.25 dBm at 2.440 GHz was taken from Intertek Report # 105948073BOX-001.FCC.

ISED RSS-102 Issue 6 Section 6.3 SAR exemption limits:

Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance

| Frequency (MHz) | ≤ 5 mm (mW) | 10 mm (mW) | 15 mm (mW) | 20 mm (mW) | 25 mm (mW) | 30 mm (mW) | 35 mm (mW) | 40 mm (mW) | 45 mm (mW) | > 50 mm (mW) |
|-----------------|-------------|------------|------------|------------|------------|------------|------------|------------|------------|--------------|
| ≤ 300 | 45 | 116 | 139 | 163 | 189 | 216 | 246 | 280 | 319 | 362 |
| 450 | 32 | 71 | 87 | 104 | 124 | 147 | 175 | 208 | 248 | 296 |
| 835 | 21 | 32 | 41 | 54 | 72 | 96 | 129 | 172 | 228 | 298 |
| 1900 | 6 | 10 | 18 | 33 | 57 | 92 | 138 | 194 | 257 | 323 |
| 2450 | 3 | 7 | 16 | 32 | 56 | 89 | 128 | 170 | 209 | 245 |
| 3500 | 2 | 6 | 15 | 29 | 50 | 72 | 94 | 114 | 134 | 158 |
| 5800 | 1 | 5 | 13 | 23 | 32 | 41 | 54 | 74 | 102 | 128 |

SAR evaluation is not required when the maximum of the conducted output power or EIRP is less than the exemption limits given in RSS-102 Issue 6 Table 11, above.

| Frequency (MHz) | Conducted Power (dBm) | Antenna Gain (dBi) | EIRP Power (dBm) | EIRP Power (mW) |
|-----------------|-----------------------|--------------------|------------------|-----------------|
| 2440 | 1.25 | 1.1 | 2.35 | 1.72 |

Evaluation Results: The EUT met the SAR exemption since the EIRP power is less than 3 mW at a separation distance of less than 5 mm. The separation distance of the radio's antenna structure to the human body is more than 5 mm.

SAR estimation for exempted transmitters per RSS-102 Issue 6 Clause 7.1.8

SAR values from exempted transmitters shall be included in the total exposure assessment. A SAR value of 0.4 W/kg for 1 g, 1 W/kg for 10 g, or an estimated SAR value based on the ratio of the power level and the power exemption limit may be used to determine the standalone SAR value for test configurations that do not require a SAR evaluation based on test reductions or on the exemption limits outlined in section 6.3.

The estimated SAR value, $SAR_{estimated}$, is calculated using equation below

$$SAR_{estimated} = \frac{P_{max}}{P_{max,exemption}} \times 0.25 \times SAR_{limit} \text{ W/kg}$$

Where

- P_{max} is the maximum power level including tune-up tolerance for the exempted transmitter
- $P_{max,exemption}$ is the maximum power level of exemption at the same frequency and distance for the exempted transmitter
- SAR_{limit} is the applicable SAR limit (e.g. 1.6 W/kg for 1 g or 4 W/kg for 10 g)

The EUT has a maximum conducted power of 1.25 dBm or 1.33 mW at 2440 MHz, using the worst-case

power exemption threshold at 2450 MHz of 3 mW.

$$\text{SAR}_{\text{Estimated}} = (1.33 \text{ mW} / 3\text{mW}) \times 0.25 \times 1.6 \text{ W/kg}$$

$$\text{SAR}_{\text{Estimated}} = (1.33 \text{ mW} / 3\text{mW}) \times 0.4 \text{ W/kg}$$

$$\text{SAR}_{\text{Estimated}} = 0.443 \times 0.4 \text{ W/kg}$$

$$\text{SAR}_{\text{Estimated}} = 0.177 \text{ W/kg}$$

6 Revision History

| Revision Level | Date | Report Number | Prepared By | Reviewed By | Notes |
|----------------|------------|------------------------------|----------------|----------------|--|
| 0 | 12/20/2024 | 105948073BOX-001.FCCMPE | KPS <i>KPS</i> | VFV <i>VFV</i> | Original Issue |
| 1 | 04/24/2025 | 105948073BOX-001.FCCMPE.Rev1 | KPS <i>KPS</i> | VFV <i>VFV</i> | Added SAR estimation for exempted transmitters on page 7 |
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