



January 14, 2025

FCC ID: T8VFZ134

To whom it may concern,

We, UL Japan, Inc, hereby declare that Controller, model: FZ134 (FCC ID: T8VFZ134) of ASAHI DENSO CO.,LTD. is exempt from RF exposure SAR evaluation because the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold  $P_{th}$  (mW) described in the following formula according to the Code of Federal Regulation title 47 section 1.1307(b)(3)(i)(B). This method is used at separation distances  $d$  (cm) from 0.5 centimeters to 40 centimeters and at frequencies from 0.3 GHz to 6 GHz (inclusive) for single RF sources.  $P_{th}$  is given by:

$$P_{th} \text{ (mW)} = \begin{cases} ERP_{20 \text{ cm}} (d / 20 \text{ cm})^x & d \leq 20 \text{ cm} \\ ERP_{20 \text{ cm}} & 20 \text{ cm} < d \leq 40 \text{ cm} \end{cases}$$

Where

$$x = -\log_{10} \left( \frac{60}{ERP_{20 \text{ cm}} \sqrt{f}} \right) \text{ and } f \text{ is in GHz}$$

$$ERP_{20 \text{ cm}} \text{ (mW)} = \begin{cases} 2040f & 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \\ 3060 & 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz} \end{cases}$$

When the minimum separation distance is shorter than 0.5 cm, 0.5 cm is applied.

The SAR evaluation exemption threshold is calculated as below.

$P_{th}$ (mW)	2.71
$f$ (GHz)	2.48
$ERP_{20 \text{ cm}}$ (mW)	3060
$d$ (cm)	0.5

Conducted Power	(dBm)	-15.89
	(mW)	0.03
Antenna Gain (dBi)		2.60
EIRP (dBm)		-13.29
ERP	(dBm)	-15.43
	(mW)	0.03

The Maximum time-averaged power or ERP whichever greater is 0.1 mW.

Even considering the tolerance, this device can be satisfied with the threshold.

Thank you for your attention to this matter.

  
Shinichi Miyazono  
Leader