



June 26, 2024

FCC ID: UOE-MR1130MB

To whom it may concern,

We, UL Japan, Inc, hereby declare that RFID UNIT2, model: RWM2MR (FCC ID: UOE-MR1130MB) of Maxell,Ltd. is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in KDB 447498D01(v06).

KDB 447498D01(v06) has the following exclusion for portable devices:

The SAR test exclusion thresholds for below 100 MHz at test separation distances \leq 50 mm are determined by step c) 1):

c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion:

- 1) For test separation distances $>$ 50 mm and $<$ 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100 / f(\text{MHz}))]$
- 2) For test separation distances \leq 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$

Numeric exemption threshold:

P_{th} step c) [mW]:	1072.71
------------------------	---------

Radio specification and use-case for this device are below:

f [MHz]:	13.56
d [mm]:	200
Maximum average output power [mW]:	120

f [MHz]: Operating frequency

d [mm]: Minimum separation distance

Maximum average output power [mW]: burst-average power

This is less than P_{th} step c), so SAR test is exemption for this device.

Thank you for your attention to this matter.

Takumi Shimada
Engineer