

Device “Handheld Reader/Writer” is only used in handheld position without any body-worn configuration and therefore can be classified as mobile.

However it will be classified as portable for conservative RF exposure evaluation purposes.

“Handheld Reader/Writer” houses a BT module with **FCC ID:PI403B** that has a portable modular approval.

According to KDB 447498 v03r03 Item 3(b)(ii)(1):

Antennas are considered to be <5cm from the user and the closest separation distance between the simultaneous transmitting antennas (RFID antenna and BT module antenna) is > 5cm as it can be verified in the photo attached to this document.

None of the transmitters in this device require stand-alone SAR evaluation

Stand-alone SAR is not required for BT module due to its low power (<60/f(GHz))

Conducted output power = 2.31dBm

Maximum antenna gain = 2dBi

EIRP = 2.7mW

Low threshold limit for BT = $60/f(\text{GHz}) = 60/2.48 = 24.2\text{mW}$, therefore stand-alone SAR is not required

For RFID radio

EIRP = 0.00314mW (based on maximum fundamental field strength conversion)

Low threshold limit for RFID = $60/f(\text{GHz}) = 60/0.01356 = 4424.78\text{mW}$, therefore stand-alone SAR is not required

Based on the above; SAR is not required for simultaneous operation of the RFID radio and the BT module housed inside the “Handheld Reader/Writer”.

In conclusion, “Handheld Reader/Writer” complies with FCC and IC RF exposure limits for general population as a portable device.

HAND HELD

Antennas

