

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 KDB 648474 given in Oct08 FCC-TCB meeting notes Harrington (Per FCC comment from KDB Inquiry tracking number 662292)

P1 = 1.96mW (BT), P2 = 9.27mW (WLAN),

D = 1.5cm (Closest distance from antenna to human body)

Dxy = 1.1cm (Closest distance between two antennas)

## BT

| Frequency Range     |                     | Center frequency (MHz) | Pref SAR Limitation (mw) |
|---------------------|---------------------|------------------------|--------------------------|
| Low Frequency (MHz) | High Frequency(MHz) |                        |                          |
| 2402                | 2480                | 2442                   | 12                       |

Maximum measured transmitter power:

| Average Source Based Power (mw) |
|---------------------------------|
| 1.96mW                          |

In page 11, Table (c)(iii) , P1 (BT) is less than 12mW, and P2 (WLAN) is also less than 12 mW.

**Conclusion:** No Stand Alone SAR is required.

## WLAN

| Frequency Range     |                     | Center frequency (MHz) | Pref SAR Limitation (mw) |
|---------------------|---------------------|------------------------|--------------------------|
| Low Frequency (MHz) | High Frequency(MHz) |                        |                          |
| 2412                | 2472                | 2442                   | 12                       |

Maximum measured transmitter power: 802.11b

| Conducted Power (mw) | Max Antenna Gain (dBi) | EIRP (mw) |
|----------------------|------------------------|-----------|
| 9.27                 | -0.9                   | 7.53      |

Maximum measured transmitter power: 802.11g

| Conducted Power (mw) | Max Antenna Gain (dBi) | EIRP (mw) |
|----------------------|------------------------|-----------|
| 5.42                 | -0.9                   | 4.41      |

In page 11, Table (c)(iii) , P2 (WLAN) is less than 12mW, and P1 (BT) is also less than 12 mW.

**Conclusion:** No Stand Alone SAR is required.



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## SIMULTANEOUS TRANSMISSION EVALUATION

EUT has meet requirement of page 14 of KDB 648474 given in Oct08 FCC-TCB meeting notes Harrington so that No Simultaneous SAR is required.

Sum of 1g SAR is less than 1.6 W/Kg