

According to KDB 447498 section 4.3.1, the 1-g SAR test exclusion thresholds at test separation distance  $\leq 50$  mm are determined by:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$$

The tune-up power is 0 dBm +/- 0dB, therefore the highest tune-up power is

$$0 \text{ dBm} \quad (1 \text{ mW}) \quad @ \text{ 0.667 MHz}$$

When the minimum *test separation distance* is  $< 5$  mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

So,

$$(1.0 \text{ mW} / 5 \text{ mm}) \cdot (0.0067 \text{ GHz}^{0.5}) = 0.016$$

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] = 0.016 < 3.0$$

Therefore, SAR are not required