



RF Exposure / SAR Exclusion Evaluation Report

Applicant	Itamar Medical Ltd.
Applicant Address	9 Halamish St., P.O.Box 3579, Caesarea 3088900 Israel
Product	Sleep Related Breathing Disorders Device
FCC ID	FCC ID: 2APUBWP400
IC	IC: 27705WP400
HVIN	WatchPAT400
FVIN	4
PMN	WatchPAT400
Standard(s)	47CFR15 Section 15.247
	RSS-247, Issue 3, August 2023, Section 5
Test Report No.	Ra293830.02

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Date:	19 December 2024					





1 EUT Information

Model No.	WatchPAT 400
Power supply	DC, 1.5V
Antenna type	Integral
Antenna gain	+3.71 dBi
Assigned frequency range	MHz
Operating frequency range	2402MHz -2480MHz
Transmit power (conducted)	4 dBm
Modulation bandwidth	1.0 MHz
Bit rate	1 Mbp/s
Distance from the human body (min.)	11 mm

2 Evaluation Methods and Limits

2.1 FCC: MPE (Maximum Permissible Exposure) assessment

• 47 CFR Section 1.1310(e)(1)

The limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields are described in Table 1 to 1.1310(e)(1). See below.

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm ²)	Averaging time (minutes)								
(i) Limits for Occupational/Controlled Exposure												
0.3-3.0	614	1.63	*(100)	≤6								
3.0-30	1842/f	4.89/f	*(900/f ²)	<6								
30-300	0-300 61.4 0.163 1.0											
300-1,500			f/300	<6								
1,500-100,000			5	<6								
	(ii) Limits for Genera	al Population/Uncontrolled	Exposure									
0.3-1.34	614	1.63	*(100)	<30								
1.34-30	824/f	2.19/f	*(180/f ²)	<30								
30-300	27.5	0.073	0.2	<30								
300-1,500			f/1500	<30								
1,500-100,000			1.0	<30								

Table 1 to § 1.1310(e)(1) - Limits for Maximum Permissible Exposure (MPE)





• KDB447498 D01 V06

"RF Exposure Procedures and Equipment Authorization Policies for Mobile and Portable Devices" v06, Section 4.3.1: "Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition(s), listed below, is (are) satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance defined in 4.1 f) is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander".

Appendix A

SAR Test Exclusion Thresholds for 100 MHz - 6 GHz and ≤ 50 mm

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table. The equation and threshold in 4.3.1 must be applied to determine SAR test exclusion.

MHz	5	10	15	20	25	mm		
150	39	77	116	155	194			
300	27	55	82	110	137			
450	22	45	67	89	112			
835	16	33	49	66	82			
900	16	32	47	63	79			
1500	12	24	37	49	61	SAR Test		
1900	11	22	33	44	54	Threshold (mW)		
2450	10	19	29	38	48			
3600	8	16	24	32	40			
5200	7	13	20	26	33			
5400	6	13	19	26	32			
5800	6	12	19	25	31			
MHz	30	35	40	45	50	mm		
150	232	271	310	349	387			
300	164	192	219	246	274			
450	134	157	179	201	224			
835	98	115	131	148	164			
900	95	111	126	142	158			
1500	73	86	98	110	122	SAR Test		
1900	65	76	87	98	109	Threshold (mW)		
2450	57	67	77	86	96			
3600	47	55	63	71	79			
5200	39	46	53	59	66			
5400	39	45	52	58	65			
5800	37	44	50	56	62			



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Appendix **B**

SAR Test Exclusion Thresholds for 100 MHz - 6 GHz and > 50 mm

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table. The equation and threshold in 4.3.1 must be applied to determine SAR test exclusion.

MHz	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	
150	387	397	407	417	427	437	447	457	467	477	487	497	507	517	527	
300	274	294	314	334	354	374	394	414	434	454	474	494	514	534	554	
450	224	254	284	314	344	374	404	434	464	494	524	554	584	614	644	
835	164	220	275	331	387	442	498	554	609	665	721	776	832	888	943	
900	158	218	278	338	398	458	518	578	638	698	758	818	878	938	998	
1500	122	222	322	422	522	622	722	822	922	1022	1122	1222	1322	1422	1522	mW
1900	109	209	309	409	509	609	709	809	909	1009	1109	1209	1309	1409	1509	
2450	96	196	296	396	496	596	696	796	896	996	1096	1196	1296	1396	1496	
3600	79	179	279	379	479	57 9	679	779	879	979	1079	1179	1279	1379	1479	
5200	66	166	266	366	466	566	666	766	866	966	1066	1166	1266	1366	1466	
5400	65	165	265	365	465	565	665	765	865	965	1065	1165	1265	1365	1465	
5800	62	162	262	362	462	562	662	762	862	962	1062	1162	1262	1362	1462	

Appendix C

SAR Test Exclusion Thresholds for < 100 MHz and < 200 mm

Approximate SAR test exclusion power thresholds at selected frequencies and test separation distances are illustrated in the following table. The equation and threshold in 4.3.1 must be applied to determine SAR test exclusion.

MHz	< 50	50	60	70	80	90	100	110	120	130	140	150	160	170	180	190	mm
100	237	474	481	487	494	501	507	514	521	527	534	541	547	554	561	567	
50	308	617	625	634	643	651	660	669	677	686	695	703	712	721	729	738	
10	474	948	961	975	988	1001	1015	1028	1041	1055	1068	1081	1095	1108	1121	1135	
1	711	1422	1442	1462	1482	1502	1522	1542	1562	1582	1602	1622	1642	1662	1682	1702	mW
0.1	948	1896	1923	1949	1976	2003	2029	2056	2083	2109	2136	2163	2189	2216	2243	2269	
0.05	1019	2039	2067	2096	2125	2153	2182	2211	2239	2268	2297	2325	2354	2383	2411	2440	
0.01	1185	2370	2403	2437	2470	2503	2537	2570	2603	2637	2670	2703	2737	2770	2803	2837	





2.2 ISED

The limits for Maximum Permissible Exposure (MPE) to radiofrequency electromagnetic fields are as described in RSS-102 - Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus, table 4. See below.

Table 4: RF Field Strength Limits for Devices Used by the General Public (Uncontrolled Environment)											
Frequency Range (MHz)	Electric Field (V/m rms)	Magnetic Field (A/m rms)	Power Density (W/m²)	Reference Period (minutes)							
0.003-10 ²¹	83	90	-	Instantaneous*							
0.1-10	-	0.73/ f	-	6**							
1.1-10	87/ f ^{0.5}	-	-	6**							
10-20	27.46	0.0728	2	6							
20-48	58.07/ f ^{0.25}	0.1540/ f ^{0.25}	8.944/ f ^{0.5}	6							
48-300	22.06	0.05852	1.291	6							
300-6000	3.142 f ^{0.3417}	0.008335 f ^{0.3417}	0.02619 f ^{0.6834}	6							
6000-15000	61.4	0.163	10	6							
15000-150000	61.4	0.163	10	616000/ f ^{1.2}							
150000-300000	0.158 f ^{0.5}	4.21 × 10 ⁻⁴ f ^{0.5}	6.67 x 10 ⁻⁵ f	616000/f ^{1.2}							
Note: f is frequency in MHz. * Based on nerve stimulation (NS). ** Based on specific absorption rate (SAR).											

• RSS-102, Issue 5, March 2015, Sections 2.5.2, 3, and 4, table 4.

According to RSS-102, Section 3, "Devices that have a radiating element normally operating at or below 6 GHz, with a separation distance of up to 20 cm between the user and/or bystander and the device, shall undergo a SAR evaluation. Devices that have a radiating element normally operating at or below 6 GHz, with a separation distance greater than 20 cm between the user and/or bystander and the device shall undergo an RF exposure evaluation. However, a SAR evaluation may be performed in lieu of an RF exposure evaluation for devices operating below 6 GHz with a separation distance of greater than 20 cm between the user and/or bystander and the device shall undergo an RF exposure evaluation. However, a SAR evaluation may be performed in lieu of an RF exposure evaluation for devices operating below 6 GHz with a separation distance of greater than 20 cm between the user and/or bystander and the device. Devices operating above 6 GHz regardless of the separation distance shall undergo an RF exposure evaluation."



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Table 1: SAR evaluation — Exemption limits for routine evaluation based on frequency and separation distance											
	Exemption Limits (mW)										
Frequency (MHz)	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm						
≤300	71 mW	101 mW	132 mW	162 mW	193 mW						
450	52 mW	70 mW	88 mW	106 mW	123 mW						
835	17 mW	30 mW	42 mW	55 mW	67 mW						
1900	7 mW	10 mW	18 mW	34 mW	60 mW						
2450	4 mW	7 mW	15 mW	30 mW	52 mW						
3500	2 mW	6 mW	16 mW	32 mW	55 mW						
5800	1 mW	6 mW	15 mW	27 mW	41 mW						

	Exemption Limits (mW)										
Frequency (MHz)	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm						
≤300	223 mW	254 mW	284 mW	315 mW	345 mW						
450	141 mW	159 mW	177 mW	195 mW	213 mW						
835	80 mW	92 mW	105 mW	117 mW	130 mW						
1900	99 mW	153 mW	225 mW	316 mW	431 mW						
2450	83 mW	123 mW	173 mW	235 mW	309 mW						
3500	86 mW	124 mW	170 mW	225 mW	290 mW						
5800	56 mW	71 mW	85 mW	97 mW	106 mW						

2.3 Calculated MPE SAR

2.3.1 FCC

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

where:

- 1. Max. power (conducted): 0.46 mW
- 2. Minimum test separation: 11 cm
- 3. Frequency = 2.4GHz

(0.46/11) * √2.4 = 0.06 Limit = ~13

Verdict: Pass





2.3.2 ISED

E.I.R.P.=Power density (W/m²) * Antenna Gain (numeric) = 0.00046 * 2.35 = 0.001

 $f = \frac{EIRP (P_t G_t)}{4\pi R^2} = \frac{0.00046 * 2.35}{4\pi 0.011^2} = 0.0007$

where:

- 1. Max. power (conducted): 0.00046 W
- 2. Minimum test separation: 0.011 m
- 3. Antenna gain: 3.71 dBi = 2.35 (numeric)
- 4. Frequency=2.4GHz

Limit = $0.02619 f^{0.6834} = 0.02619 * 2.4^{0.6834} = 0.05$

Verdict: Pass

3 Conclusion

The measurement results comply with the limits per the abovementioned FCC and ISED requirements.

End of Report