

## Portable device

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 KDB447498 D01 General RF Exposure Guidance V05

The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm are determined by:

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] * [\sqrt{f(\text{GHz})}] \leq 3.0$  for 1-g SAR and  $\leq 7.5$  for 10-g extremity SAR, where

$f(\text{GHz})$  is the RF channel transmit frequency in GHz;

Power and distance are rounded to the nearest mW and mm before calculation;

The result is rounded to one decimal place for comparison;

The test exclusions are applicable only when the minimum test separation distance is  $\leq 50$  mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is  $< 5$  mm, a distance of 5 mm is applied to determine SAR test exclusion.

We use 5mm as separation distance to calculated.

Maximum measured transmitter power:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up power(dBm)	Result calculation	1-g SAR
2.402	GFSK	-4.870	$-6 \pm 1$	-5	0.080	3.00
2.441	GFSK	-5.404	$-6 \pm 1$	-5	0.082	3.00
2.480	GFSK	-6.904	$-6 \pm 1$	-5	0.082	3.00
2.402	$\pi/4$ -DQPSK	-3.658	$-5.5 \pm 1$	-4.5	0.091	3.00
2.441	$\pi/4$ -DQPSK	-3.892	$-5.5 \pm 1$	-4.5	0.092	3.00
2.480	$\pi/4$ -DQPSK	-6.087	$-5.5 \pm 1$	-4.5	0.093	3.00
2.402	8-DPSK	-3.231	$-5 \pm 1$	-4	0.102	3.00
2.441	8-DPSK	-3.909	$-5 \pm 1$	-4	0.103	3.00
2.480	8-DPSK	-5.514	$-5 \pm 1$	-4	0.104	3.00

### Conclusion:

For the max result  $0.0021 \leq 3.0$  for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

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