

## **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           | 0.657                | -0±1                | 1                      | 0.390              | 3.00    |
| 2.441                    | GFSK           | -2.599               | -2±1                | -1                     | 0.240              | 3.00    |
| 2.480                    | GFSK           | 0.270                | -0±1                | 1                      | 0.390              | 3.00    |
| 2.402                    | $\pi/4$ -DQPSK | 1.398                | -0±1                | 1                      | 0.390              | 3.00    |
| 2.441                    | $\pi/4$ -DQPSK | 0.483                | -0±1                | 1                      | 0.393              | 3.00    |
| 2.480                    | $\pi/4$ -DQPSK | -0.031               | -0±1                | 1                      | 0.396              | 3.00    |
| 2.402                    | 8-DPSK         | 0.510                | -0±1                | 1                      | 0.390              | 3.00    |
| 2.441                    | 8-DPSK         | 0.747                | -0±1                | 1                      | 0.393              | 3.00    |
| 2.480                    | 8-DPSK         | 0.239                | -0±1                | 1                      | 0.396              | 3.00    |

### **Conclusion:**

For the max result  $0.396 \leq 3.0$  for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

Company Name: SHENZHEN EMTEK CO., LTD.

Address: Bldg 69, Majialong Industry Zone, NanshanDistrict, Shenzhen, China.

David Lee/ Manager