

**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:

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

$f(\text{GHz})$  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 calculate.

Maximum measured transmitter power:

BT DSS:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up power(dBm)	Result calculation	1-g SAR
2.402	GFSK	-1.47	-1 $\pm$ 1	0	0.3100	3
2.441	GFSK	-1.39	-1 $\pm$ 1	0	0.3125	3
2.48	GFSK	-1.87	-1 $\pm$ 1	0	0.3150	3
2.402	$\pi$ /4-DQPSK	-2.64	-2 $\pm$ 1	-1	0.2462	3
2.441	$\pi$ /4-DQPSK	-2.50	-2 $\pm$ 1	-1	0.2482	3
2.48	$\pi$ /4-DQPSK	-2.72	-2 $\pm$ 1	-1	0.2502	3
2.402	8DPSK	-2.41	-2 $\pm$ 1	-1	0.2462	3
2.441	8DPSK	-2.25	-2 $\pm$ 1	-1	0.2482	3
2.48	8DPSK	-2.65	-2 $\pm$ 1	-1	0.2502	3
2.402	GFSK	-1.91	-2 $\pm$ 1	-1	0.2462	3
2.440	GFSK	-1.95	-2 $\pm$ 1	-1	0.2482	3
2.48	GFSK	-1.97	-2 $\pm$ 1	-1	0.2502	3

**Conclusion:**

For the max result :  $0.3150 \leq 3.0$  for 1-g SAR extremity SAR, No SAR is required.

**Signature:**

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