



April 12, 2021

RF Exposure Report, Rev 1  
Supports WL Report # 17018

KAZ USA, Inc. c/o Helen of Troy  
Digital Transmission System  
FCC ID: 2ABRGIRT6575  
ISED ID: 11714A-IRT6575

FCC: The EUT does not require SAR testing as the power is below the SAR threshold at 5mm.

KDB 447498 DO1 General RF Exposure Guidance v06 Section 4.3.1 (a) –

For 100 MHz to 6 GHz and *test separation distances*  $\leq 50$  mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following:

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

The peak transmitter output measured -3.2 dBm (antenna port, conducted).

Using the formula  $\text{EIRP} = P_{(\text{dBm})} + G_{(\text{dBi})}$   
 $\text{EIRP} = -3.2 + 5.3$   
 $\text{EIRP} = 2.1 \text{ dBm}$

$$2.1 \text{ dBm} = 1.6 \text{ mW}$$

Per KDB 447498, the power shall be rounded to the nearest mW.  
2.0 mW will be used for the calculation.

$$[2\text{mW}/5\text{mm}] \times [\sqrt{2.48(\text{GHz})}] = 0.4 \times 1.57 = 0.622 < 3$$

As this is less than 3, the EUT complies with the 1-g SAR exclusion.



ISED Canada: The EUT is categorically excluded from RF Exposure and does not require SAR testing.

Per section 2.5.1 of RSS 102:

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance as defined in the table below.

**SAR Evaluation – Exemption Limits for Routine Evaluation Based on Frequency and Separation Distance.**

Frequency (MHz)	Exemption Limits				
	At separation distance of $\leq 5$ 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
$\leq 300$	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

The interpolated exemption limit at 2400 MHz is: 4.3 mW

The interpolated exemption limit at 2483.5 MHz is: 3.9 mW

EUT Data: 2.1 dBm EIRP = 1.6 mW (rounded to 2 mW)

This power level shows that the EUT complies with the  $\leq 5$  mm separation distance, does not require SAR testing.

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