

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 ≤ 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 ≤ 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 ≤ 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
2.412	11b	7.39	7 ± 1	8	1.95983	3.00
2.437	11b	7.91	7 ± 1	8	1.96996	3.00
2.462	11b	7.59	7 ± 1	8	1.98004	3.00
2.412	11g	7.82	7 ± 1	8	1.95983	3.00
2.437	11g	7.78	7 ± 1	8	1.96996	3.00
2.462	11g	7.74	7 ± 1	8	1.98004	3.00
2.412	11n HT20	8.01	8 ± 1	9	2.46728	3.00
2.437	11n HT20	8.05	8 ± 1	9	2.48004	3.00
2.462	11n HT20	8.03	8 ± 1	9	2.49272	3.00
2402	GFSK	-16.17	-16 ± 1	-15	0.00980	3.00
2441	GFSK	-16.78	-16 ± 1	-15	0.00988	3.00
2480	GFSK	-18.26	-18 ± 1	-17	0.00628	3.00
2402	pi/4-DQPSK	-15.29	-15 ± 1	-14	0.01234	3.00
2441	pi/4-DQPSK	-15.75	-15 ± 1	-14	0.01244	3.00
2480	pi/4-DQPSK	-17.27	-17 ± 1	-16	0.00791	3.00
2402	8DPSK	-15.29	-15 ± 1	-14	0.01234	3.00
2441	8DPSK	-16.04	-16 ± 1	-15	0.00988	3.00
2480	8DPSK	-17.43	-17 ± 1	-16	0.00791	3.00

Conclusion:

For the max result $2.49272 \leq 3.0$ for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

Company Name: SHENZHEN EMTEK CO., LTD.

Address: Bldg 69, Majialong Industry Zone, Nanshan District, Shenzhen, China.

David Lee/ Manager