

According to KDB 447498 D01 v06 section 4.3.1, the 1-g SAR test exclusion thresholds at test separation distance ≤ 50 mm are determined by:

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

The average power is 5.19 dBm and duty factor is 1.01dB, therefore the highest tune-up power is 6.20 dBm

6.20 dBm (4.1687 mW) @ 2480 MHz

When the minimum *test separation distance* is < 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

So,

$$(4.1687\text{mW} / 5\text{mm}) \cdot (2.480\text{GHz}^{0.5}) = 1.313$$

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] = 1.313 < 3.0$$

Therefore, SAR are not required