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Subject: SAR Compliance

Pursuant to OET Bulletin 65, Supplement C, section 3: RF exposure compliance for spread spectrum transmitters, the devices are categorically excluded from routine environmental evaluation because they generally operate at relatively low power levels where there is a high likelihood of compliance with RF exposure standards.

Our RF module operates using spread spectrum with an output power that is under 40mW. The antenna gain is 3, resulting in 120mW EIRP. However, the worker transmits one 1.8msec blink per second so the time averaged duty factor reduces the actual EIRP to  $40\text{mW} \times 3 \times 0.18\% = 0.216\text{mW}$  (216 micro watts.) Therefore, it would meet SAR limits and cautionary labeling is all that is required.

The duty cycle is controlled by the firmware and cannot be adjusted by the user.

Sincerely,

Sara Woitel  
Sr Project Manager  
Metrom Rail, LLC