FCC ID: 2BBAS-GEMTONES

RF exposure evaluation

According to§15.247(i), §1.1307 (b) and KDB447498, 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 guidance.

The SAR-based exemption formula of §1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold Pth (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). Pth is given by Formula (B.2).

$$P_{\text{th}}\,(\text{mW}) = \begin{cases} ERP_{20\,\text{cm}}(d/20\,\text{cm})^{x} & d \le 20\,\text{cm} \\ ERP_{20\,\text{cm}} & 20\,\text{cm} < d \le 40\,\text{cm} \end{cases} \qquad \text{(B.2)}$$

where

$$x = -\log_{10}\left(\frac{60}{ERP_{20\,\text{cm}}\sqrt{f}}\right)$$

F is in GHz, d is the separation distance (cm), and ERP20cm is per Formula (B.1).
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
BT
Antenna gain: 3.59 dBi
Conducted Transmit Power Max: = -8.89dBm = 0.13 mW
EIRP=-8.89dBm + 3.59 dBi=-5.3dBm
ERP= -5.3-2.15dB= -7.45dBm
The maximun ERP power specified is -7.45dBm = 0.18mW
The source- based time-averaging conducted output power
=0.18 * Duty factor mW (where Duty Factor≤1)
= 0.18 mW

BLE

Antenna gain: 3.59 dBi

Conducted Transmit Power Max: = -9.48dBm = 0.11 mW

EIRP=-9.48dBm + 3.59 dBi=-5.89dBm

ERP= -5.89-2.15dB= -8.04 dBm

The maximun ERP power specified is -8.04 dBm = 0.16mW

The source- based time-averaging conducted output power

=0.16 * Duty factor mW (where Duty Factor≤1)

= 0.16 mW

The SAR Exclusion Threshold Level:

P_{th}(mW) = ERP_{20cm} * (d/20cm) ^{x} (X= $-\log_{10}\left(\frac{60}{ERP_{20\,cm}\sqrt{f}}\right)$)

= 2.72 mW

Since the source-based time-averaging conducted output power is well below the SAR low threshold level, so the EUT is considered to comply with SAR requirement without testing.