

Description letter

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Equipment Type:	NFCR-INTERNAL					
Model Name:	NFC-I-SX-21548					
Brand Name:	INVISPOWER					
FCC ID:	2BBHHYGKJ-V216NFC					
Test Standard:	KDB 447498 D01 v06					

ISSUED BY:

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SAR test exclusion (KDB 447498 D01 General RF Exposure Guidance v06)

1. Standalone SAR test exclusion considerations

Unless specifically required by the *published RF exposure KDB procedures*, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition(s), listed below, is (are) satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance defined in 4.1 f) is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander. To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified, typically in the SAR measurement or SAR analysis report, by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, according to the required *published RF exposure KDB procedures*. When no other RF exposure testing or reporting are required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops and tablets, etc.

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:

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

- $f_{(GHz)}$ 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 values 3.0 and 7.5 are referred to as *numeric thresholds* in step b) below

The test exclusions are applicable only when the minimum *test separation distance* is \leq 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 according to 4.1 f) is applied to determine SAR test exclusion.

b) For 100 MHz to 6 GHz and *test separation distances* > 50 mm, the 1-g and 10g *SAR test exclusion thresholds* are determined by the following (also illustrated in Appendix B):

1) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance

 $-50 \text{ mm} \cdot (f_{(MHz)}/150)]$ mW, for 100 MHz to 1500 MHz

2) {[Power allowed at *numeric threshold* for 50 mm in step a)] + [(test separation distance – 50 mm) \cdot 10]} mW, for > 1500 MHz and \leq 6GHz



c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion (also illustrated in Appendix C):

1) For *test separation distances* > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100/f_{(MHz)})]$

2) For *test separation distances* \leq 50 mm, the power threshold determined by the equation in

c) 1) for 50 mm and 100 MHz is multiplied by $^{1\!\!/}_2$

3) SAR measurement procedures are not established below 100 MHz.

2. EUT technologies

Typical distance to the human body during normal use: 200 mm

Technology	Frequency [MHz]		Reference	Output Power [dBm]		
	f _{Min}	f _{Max}	#	P_{cond}	P _{EIRP}	P _{RF Exp}
NFC 13.56 MHz	13.56	13.56	N/A	-25.13	-25.13	-25.13

Note: The frequency of EUT is not applicable in KDB 447498 D01 v06.

3. Conclusion

RF exposure evaluation of the EUT is not required.