

Sony Global Manufacturing & Operations Corporation EMC/RF Test Laboratory, Main Lab.

Kisarazu Site 8-4 Shiomi Kisarazu-shi, Chiba, 292-0834 Japan

Date: August 1, 2019

FCC ID : AK8WFH800 Applicant: Sony Corporation

SAR Evaluation Exemption

To whom it may concern,

We, Sony Global Manufacturing & Operations Corporation EMC/RF Test Laboratory, Main Lab., hereby declare that Wireless Stereo Headset, models: WF-H800L,WF-H800R (FCC ID: AK8WFH800) of Sony Corporation are exempt from RF exposure SAR evaluation, as their output power meet the exclusion limits, stated in FCC Part 2 §2.1093.

According to KDB 447498 D01 (v06), section 4.3.1:

- ... These test exclusion conditions are based on source-based time-averaged (i.e. frame 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 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances \leq 50 mm are determined by:

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

For above device,

Regarding **Bluetooth BR/EDR**;

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f = 2.48 \text{ GHz}, distance = 5mm (the min. separation distance is < 5 mm),
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the max. possible duty cycle = 83.3% = -0.79 dB,

(* xDH5: 83.3% = (On time; 625 µs * 5 slots) / (On time + Off time; 625 µs * 6 slots))

the max. possible burst averaged power incl. tune-up tolerance = 9.5 dBm, and

the max. possible <u>frame averaged</u> power incl. tune-up tolerance = 9.5 + (-0.79) = 8.71 dBm ≈ 7 mW. Therefore,

 $7 \text{ mW} / 5 \text{ mm} * (\sqrt{2.48 \text{ GHz}}) = 2.2 < 3.0$

and no SAR evaluation is required.

Regarding Bluetooth Low Energy;

f = 2.48 GHz, distance = 5mm (the min. separation distance is < 5 mm),

the max. possible duty cycle = 100% = 0.00 dB,

the max. possible burst averaged power incl. tune-up tolerance = 2.9 dBm, and

the max. possible <u>frame averaged</u> power incl. tune-up tolerance = $2.9 + (0.00) = 2.9 \text{ dBm} \approx 2 \text{ mW}$. Therefore,

 $2 \text{ mW} / 5 \text{ mm} * (\sqrt{2.48 \text{ GHz}}) = 0.6 < 3.0$

and no SAR evaluation is required.



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Thank you for your attention to this matter.

Sincerely,

Teruki Kurihara

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Design Technology Division

Sony Global Manufacturing & Operations Corporation