Date: October 17, 2017

FCC ID : AK8WISP500 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 Noise Canceling Stereo Headset, models: WI-SP500 (FCC ID: AK8WISP500) 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. <u>frame averaged</u>) 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)] • [ $\sqrt{f}(GHz)$ ]  $\leq 3.0$  for 1-g SAR and  $\leq 7.5$  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  $\leq 50$  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 is applied to determine SAR test exclusion.

For above device,

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

the max. possible duty cycle = 78.5% = -1.05 dB,

the max. possible <u>burst averaged</u> power incl. tune up tolerance = 5.00 dBm, and

the max. possible <u>frame averaged</u> power incl. tune-up tolerance = 5.00 + (-1.05) = 3.95 dBm  $\approx 3$  mW. Therefore,

3 mW / 5 mm \* (  $\sqrt{2.48}$  GHz) = 0.8 < 3.0 and no SAR evaluation is required.

Thank you for your attention to this matter.

Sincerely,

Hwihara

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