Date: July 14, 2023

FCC ID : AK8WW351513
Applicant: Sony Group Corporation

SAR Evaluation Exemption

To whom it may concern,

We, Sony Global Manufacturing & Operations Corporation EMC/RF Test Laboratory, Main Lab., hereby declare that Radio Equipment, model: WW351513 (WW351513) of Sony Corporation is exempted from RF exposure SAR evaluation, as its output power meets 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 ≤ 50 mm are determined by:
  [(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] · [√f(GHz)] ≤ 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,
  f = 2.48 GHz, distance = 5mm,
  the max. possible duty cycle = 100 % = 0.00 dB,
  the max. possible <u>burst averaged</u> power incl. tune-up tolerance = 8.16 dBm, and
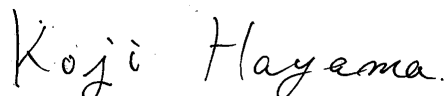 the max. possible <u>frame averaged</u> power incl. tune-up tolerance = 8.16 + (0.00) = 8.16 dBm ≈ 7 mW.

Therefore,
       7 mW / 5 mm * (√ 2.48 GHz) = 2.2 < 3.0
and no SAR evaluation is required.

Thank you for your attention to this matter.

Sincerely,

Koji Hayama
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EMC/ RF Test Laboratory Main Lab.
Design Technology Division
Sony Global Manufacturing & Operations Corporation