



December 27, 2023

FCC ID: CWTB2211

To whom it may concern,

We, UL Japan, Inc, hereby declare that Automatic access gesture control, model: B2211 (FCC ID: CWTB2211) of ALPS ALPINE CO., LTD. is exempt from RF exposure SAR evaluation because the available maximum time-averaged power or effective radiated power (ERP), whichever is greater, is less than or equal to the threshold P_{th} (mW) described in the following formula according to the Code of Federal Regulation title 47 section 1.1307(b)(3)(i)(C). This method is used at minimum separation distances R (m) from 3 centimeters and at frequencies from 0.3 MHz to 100 GHz (inclusive) for single RF sources. P_{th} is given by:

RF Source frequency [MHz]	RF sources. P_{th} [watts]
0.3 - 1.34	$1,920 R^2$
1.34 - 30	$3,450 \frac{R^2}{f^2}$
30 - 300	$3.83 R^2$
300 - 1,500	$0.0128 R^2 f$
1,500 - 100,000	$19.2 R^2$

R must be at least $\lambda/2\pi$, where λ is the free-space operating wavelength in meters.

The SAR evaluation exemption threshold is calculated as below.

[24 GHz band part]

P_{th} (mW)	17.28
f (GHz)	24.25
R (cm)	3.0

EIRP (dBm)	4.67
ERP (dBm)	2.53
ERP (mW)	1.79

The Maximum time-averaged power or ERP whichever greater is 1.8 mW.
(Rounded up to two decimals place)

Even considering the tolerance, this device can be satisfied with the threshold.

Thank you for your attention to this matter.

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Engineer