

December 5, 2014

UL Kashima, Inc.  
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FCC ID: CWTUGMZ2AA

To whom it may concern,

We, UL Japan, Inc., hereby declare that Bluetooth Module, model : UGMZ2AA  
(FCC ID: CWTUGMZ2AA) of ALPS Electric Co., Ltd. is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in FCC Part 2 §2.1093.

KDB 447498D01(v05r02) has the following exclusion for portable devices:

The 1g and 10g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances  $\leq 50$  mm are determined by:

$[(\text{maximum average output power with tolerance (mW)})/(\text{Minimum separation distance(mm)})] \cdot \sqrt{f \text{ (GHz)}}$

$\leq 3.0$  for 1g SAR and  $\leq 7.5$  for 10g 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.

This device  $f = 2.48$  GHz, distance = 5mm (minimum separation distance: 5 mm was used in the calculation) and the maximum average output power with tolerance was 1 mW  
(Output power in theory of Operation.)

So for this device:

$1 \text{ mW} [\text{maximum average output power with tolerance}] / 5 \text{ mm} [\text{minimum separation distance}] \cdot (\sqrt{2.48}) = 0.3$

\*This is less than 3.0, so no SAR is required.

Thank you for your attention to this matter.



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