



2014/11/20

UL Japan, Inc.
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FCC ID: DV8LX7230G

To whom it may concern,

We, UL Japan, Inc., hereby declare that ECG, Respiration and SpO2 Transmitter, model : LX-7230N (FCC ID: DV8LX7230G) of Fukuda Denshi 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 ≤ 50 mm are determined by:

$[(\text{maximum tune-up with tolerance (conducted)})(\text{mW})/(\text{Minimum separation distance}(\text{mm}))] \cdot \sqrt{f (\text{GHz})}$

≤ 3.0 for 1g SAR and ≤ 7.5 for 10g extremity SAR where

- $f(\text{GHz})$ 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.

This device $f = 1.4314625$ GHz, distance = 5mm (minimum separation distance: 5 mm was used in the calculation) and the maximum tune-up with tolerance (conducted) was 8 mW

So for this device:

$8 \text{ mW} [\text{maximum tune-up with tolerance (conducted)}] / 5 \text{ mm} [\text{minimum separation distance}] \cdot (\sqrt{1.4314625}) = 1.9$

* calculation: $\text{maximum tune-up tolerance limit (conducted)} = 10^{((10 \times \log(\text{specification output power [mW]} + \text{tolerance [dB]})) / 10)}$
 $= 10^{((10 \times \log(5 [\text{mW}]) + 2 [\text{dB}]) / 10)}$

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

Thank you for your attention to this matter.

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