According to KDB 447498 D01 Mobile Portable RF Exposure v04

Requirement

- 5) Push-to-talk (PTT) devices
- a) RF exposure is evaluated with a duty factor of 50 % when the actual operating duty factor is ≤50%. Devices supporting higher duty factors shall be evaluated at the maximum duty factor; for example, devices supporting operator-assisted PSTN calls. Contact the FCC Laboratory when unable to test a device at the required duty factor due to hardware limitations or other reasons.

b) Portable PTT devices

i) The power thresholds and operating conditions in Table 1 are used to determine SAR test requirements for PTT radios required to comply with the general population exposure limit. When the occupational exposure limit applies, these power thresholds are increased by a factor of five (5) to determine the test requirements. SAR is required for PTT devices with maximum output power greater than these thresholds. SAR evaluation is also required for separation distances smaller than those in Table 1. Contact the FCC Laboratory to determine if SAR evaluation is necessary for other frequencies or when the SAR is very low.

Table 1 - SAR Evaluation Power Thresholds for PTT devices, $f \le 0.5$ GHz Exposure Conditions	mW
Held to face ≥ 2.5 cm	250
Body-worn ≥ 1.5 cm	200
Body-worn ≥ 1.0 cm	150

Evaluation

The model SP-400 has an output power of 1.86W and operates with a duty factor of less than 50%. At 50% duty factor, the SP-400 has an output power rating of 0.93W.

The SP-400 is intended for occupational use and is held to face ≥ 2.5 cm. The power threshold of 250mW is increased by a factor of 5 which is equivalent to 1.25W.

Since 0.93W is below the threshold of 1.25W, SAR testing is not required.