

According to §15.247(e)(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB 447498, no SAR required if power is lower than the flowing threshold:

Frequency Range		Center frequency (MHz)	60/f SAR Limitation (mw)
Low Frequency (MHz)	Low Frequency(MHz)		
2402	2480	2441	24.58

Maximum measured Average transmitter power:

Conducted Average Power (dBm)	Conducted Average Power (mw)
9.1	8.13

Threshold at which no SAR required is 24.58 mw.

Maximum Tx power is 8.13mw EIRP.

Conclusion: No SAR is required.