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**Date:** 22 May 2020

**To:**  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, Maryland 21046  
USA

**RE: SAR Test Exclusion for FCC ID: IPH-03699**

The Garmin International Inc. Model A03699, FCC ID: **IPH-03699** is a Body Worn low power ANT/BLE transceiver. It has a manufacturers maximum rated output power of 8dBm and was verified by means of conducted output power measurement at the antenna port. The highest measured conducted output power for ANT and BLE was 7.81dBm and 6.79dBm respectively. The highest measured field strength at 3m was 48.84dBuV and 52.38dBuV respectively. This equates to an EIRP of approximately -17dBm and -14dBm respectively. The manufacturer's maximum rated transmit duty cycle (Reference Exhibit x – Operation Description) is 13.3% and 26.5% respectively. The measured duty cycle was 0.067% and 0.17% respectively. Using the rated output power of 8dBm (6.3mW) and the maximum rated transmit duty cycle of 26.5%, the equivalent output power is:

$$6.3\text{mW} \times 0.265 = 1.7\text{mW}$$

Per FCC KDB 447498 D01v06r02 Appendix A, the SAR Test Exclusion Threshold is 10mW therefore this device meets the Standalone SAR Test Exclusion requirement.

Should there be any questions or concerns with this filing, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Art Voss'.

**Art Voss, P.Eng.**  
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