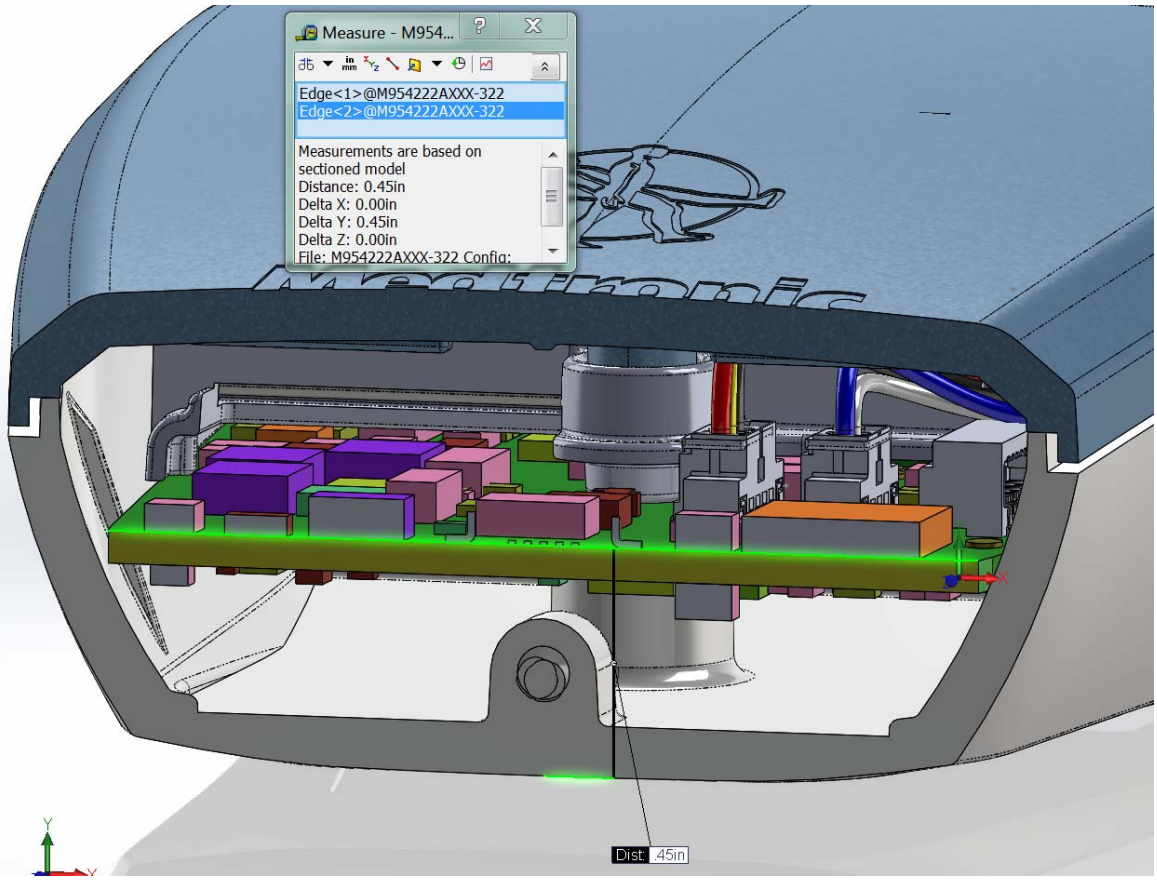

The distance between the top of the Model 24965 Patient Connector PCB and the bottom of the outside of the housing is 0.45in (11.4mm). The Bluetooth antenna resides on the Bluetooth module which is above the surface of the PCB (it resides on the top side of the PCB). Therefore, the Bluetooth antenna is greater than 11.4mm from the surface of the patient's torso.

According to FCC KDB 447498, Section 4.3.1:

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

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] · [√f(GHz)] ≤ 3.0 for 1-g SAR and ≤ 7.5 for 10-g 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 calculation26
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

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 according to 5) in section 4.1 is applied to determine SAR test exclusion. "

Since the maximum conducted power is 14mW, and solving for a ratio of 3, the minimum distance would need to be 7mm in order to claim a SAR test exclusion. Since the minimum distance is 11.4mm, a SAR test exclusion is claimed.