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According to KDB 447498 section 4.3.1, the 1-g SAR test exclusion thresholds at test separation distance ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] \*·[ f(GHz)]  $\leq 3.0$ 

The tune-up power is -14 dBm +/- 2dB, therefore the highest tune-up power is -14.13 dBm (0.04 mW) @ 433.9 MHz

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.

So,

 $(0.04 \text{mW} / 5 \text{mm}) * (0.433 \text{GHz} ^0.5) = 0.0$ 

[(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] \* [ f(GHz)] = 0.0 < 3.0

Therefore, standalone SAR measurements are not required for both head and body.