



No SAR justification for FCC ID: MQT-FD35GT

Following FCC KDB 447498 D01 “General SAR test exclusion guidance”

The corresponding SAR Exclusion Threshold condition, listed below:

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:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [f(\text{GHz})] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- Ø $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Ø Power and distance are rounded to the nearest mW and mm before calculation
- Ø The result is rounded to one decimal place for comparison

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 is applied to determine SAR test exclusion.

2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following:

- a) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · (f(MHz)/150)] mW, at 100MHz to 1500 MHz
- b) [Threshold at 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion.

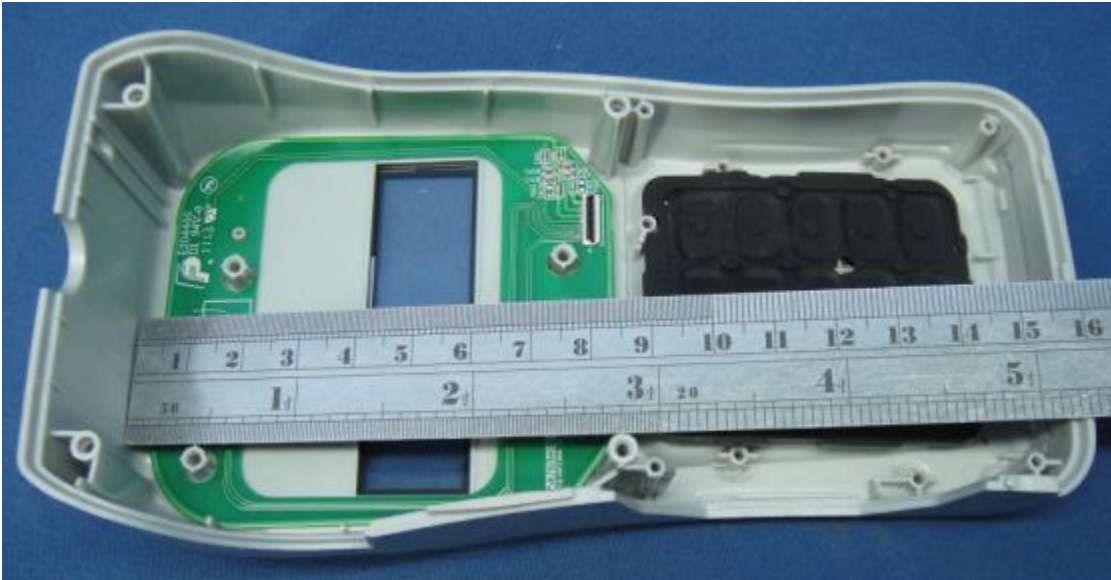
- a) The threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm.
- b) The threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm.
- c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.



Smallest distance from the antenna and radiating structures or outer surface of the device

The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander. (See below figure)





Power table

Mode	Frequency (MHz)	Electric field (dBuV/m) @3m	EIRP (dBm)
RFID	13.56	76.3	-18.93

Field strength is then converted to EIRP as follows:

(i) $EIRP = ((E*d)^2) / 30$

where:

E is the field strength in V/m;

d is the measurement distance in meters;

EIRP is the equivalent isotropically radiated power in watts.

(ii) Working in dB units, the above equation is equivalent to: $EIRP[dBm] = E[dB\mu V/m] + 20 \log(d[meters]) - 104.77$

(iii) Or, if d is 10 meters: $EIRP[dBm] = E[dB\mu V/m] - 84.8$



SAR Test Exclusion Thresholds

Frequency (MHz)	Max. Power (mW) ^{*1}	Min. test separation distance (mm)	SAR test exclusion power thresholds ^{*2} (mW)	Result
13.56	0.01288	≤ 50 mm	593	Pass

^{*1} Max. power obtained from maximum EIRP.

^{*2} Calculate SAR test exclusion thresholds from “ 3 ” formulas. (base on 10-g extremity SAR exclusion thresholds)

Conclusion

Since maximum EIRP is below SAR test exclusion power thresholds, the SAR evaluation is not required.