No SAR justification

The device is measured 193.1x79.7x54.9 mm and it became even big when thermal paper is loaded under normal work condition. The device is specific designed for using on countertop for fee processing and normally seat on countertop when it is not in use and is not suitable for body worn application. The peak average output power for this device is rated at 324mw max for 850M band and 288mw max for 1900M band, and is below the SAR exemption level 1085mw for 850M band and 725mw for 1900M band as defined in KDB 447498 (No SAR if less than $1000*[f_{(GHz)}]^{45}$). The actual average output power is even less when in considering that the device transmits only 1-2 sec in few minutes per transaction. Accordingly, SAR evaluation is conservatively not required for this product.