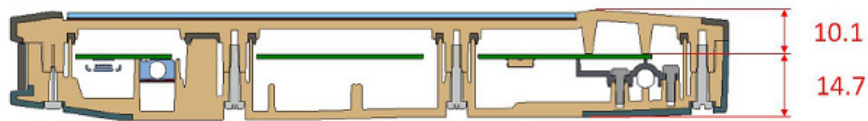




## ANNEX for SAR Exemption

Model: PD-C (01)  
FCC ID: SDL-PDC01  
IC: 5228A-PDC01

PD-C (01) Bluetooth antenna separation distance to device outer surfaces [mm]



The picture is illustrating the BT antenna distance to PD-C surfaces. Minimum distance from the antenna to PD-C surface is 10.1mm.



When we add the soft pouch and user clothing, the 15mm separation distance is easily exceeded.



MHz	5	10	15	20	25	mm
150	39	77	116	155	194	SAR Test Exclusion Threshold (mW)
300	27	55	82	110	137	
450	22	45	67	89	112	
835	16	33	49	66	82	
900	16	32	47	63	79	
1500	12	24	37	49	61	
1900	11	22	33	44	54	
2450	10	19	29	38	48	
3600	8	16	24	32	40	
5200	7	13	20	26	33	
5400	6	13	19	26	32	
5800	6	12	19	25	31	

**Note:** 10-g Extremity SAR Test Exclusion Power Thresholds are 2.5 times higher than the 1-g SAR Test Exclusion Thresholds indicated above. These thresholds do not apply, by extrapolation or other means, to occupational exposure limits.

Calculating according to KDB 447498 D01  $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}]$ , using PD-C values  $[11/10] \cdot [\sqrt{2.4}]$  gives us result 1.704 which is significantly lower than 7.5 mentioned in the KDB above. (in the equation above 11 = max transmit power (10.94 [mW]), 10 = min separation distance [mm] from antenna to PD-C surface)- therefore we don't see need for SAR testing.

The Laser Range Meter "PD-C (01) device has a maximum output power of 10.39 dBm (10.94 mW). In the case of this product 10-g Extremity SAR test exclusion applies. Therefore exempted from SAR as per KDB 447498 D01 General RF Exposure Guidance v05r02 given that a minimum distance of 10 mm is set between the antenna and the Body.

Yours sincerely,

Abdellah Ahakki