## FCC ID: SWN-TD40UT

According to KDB 447498 D01 General RF Exposure Guidance v06.

For frequencies below 100 MHz , the following may be considered for SAR test exclusion (also illustrated in Appendix C).

1) For test separation distance $>50 \mathrm{~mm}$ and $<200 \mathrm{~mm}$, the power threshold at the corresponding test separation distance at 100 NHz in setp b) is mutiplied by $\left[1+\log \left(100 / \mathrm{f}_{(\mathrm{NHt})}\right)\right]$
2) For test separation distance $\leq 50 \mathrm{~mm}$, the power threshold determined by the equation in C) 1) for 50 mm and 100 MHz is multiplied by $1 / 2$
[(max. power of channel, including tune-up tolerance, mW) / (min. test separation distance, mm)] $x[\operatorname{Vf}(\mathrm{GHz})] \leq 3.0$

## 1. SAR test exclusion threshold: 3.0

Step a): at 100 MHz and 50 mm , power threshold $=(3.0 * 50) / \operatorname{sqrt}(0.1)=474.342 \mathrm{~mW}$
Step b1): $474.342+(50-50) \times(27.145 / 150)=474.342 \mathrm{~mW}$
Step c1): $474.342 \times[1+\log (100 / 27.145)]=742.967 \mathrm{~mW}$
Step c2): 742.967/2 = 371.484 mW

| Frequency | Max. tune-up <br> tolerance | Duty | Duty Factor | Result | Limit |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 27.145 NHzz | 794.328 mW <br> $(29.00 \mathrm{dBm})$ | 45.85 | 6.77 | 167.109 mW <br> $(22.23 \mathrm{dBm})$ | 371.484 mW |

## Note;

The EUT has two buttons (Constant, Nick) and each button transmits with same duty cycle.
The only difference is transmission time.
Nick : one pulse with duty cycle.
Constant : press and hold the button to automatically stop for up to 12 seconds with duty cycle.

## Calculation;

$\mathrm{t} 1=3.05 \mathrm{~ms}, \mathrm{t} 2=0.95 \mathrm{~ms}, \mathrm{t} 3=0.85 \mathrm{~ms}, \mathrm{t} 4=1.35 \mathrm{~ms}, \mathrm{t} 5=1.75 \mathrm{~ms}, \mathrm{t} 6=1.65 \mathrm{~ms}, \mathrm{t} 7=0.75 \mathrm{~ms}$,
$\mathrm{t} 8=1.55 \mathrm{~ms}, \mathrm{t} 9=1.15 \mathrm{~ms}, \mathrm{t} 10=1.45 \mathrm{~ms}, \mathrm{t} 11=1.05 \mathrm{~ms}, \mathrm{t} 12=2.45 \mathrm{~ms}$
$T_{\text {on }}=\left\{t 1+(2\right.$ * $\left.t 2)+t 3+\left(3^{*} t 4\right)+t 5+\left(4^{*} t 6\right)+t 7+\left(3^{*} t 8\right)+\left(2^{*} t 9\right)+\left(5^{*} t 10\right)+t 11+t 12\right\}$
$\mathrm{T}_{\text {on }}=36.65 \mathrm{~ms}$.
$\mathrm{T}_{\text {on+off }}=79.93 \mathrm{~ms}$.
Duty Cycle $=20 \log \left(T_{\text {on }} / T_{\text {on+off }}\right)=20 \log (0.4585)=-6.77 \mathrm{~dB}$

## 2. Conclusion: No SAR is required.

Note: Measured maximum output power : $26.30 \mathrm{dBm} /$ Tune-up tolerance : $27 \mathrm{dBm} \pm 2 \mathrm{~dB}$

Test Plots;

t3
t4

t5
t6



t7
t8

t9
t6



t10
t4

t6
t10


t8
t8

t11




Period

