

April 16, 2024

FCC ID: Y8PSU23S-1

To whom it may concern,

We, UL Japan, Inc, hereby declare that Keyless Access with Push-Button Start System, model: SU23S-1 (FCC ID: Y8PSU23S-1) of SUBARU CORPORATION is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in KDB 447498D01(v06).

KDB 447498D01(v06) has the following exclusion for portable devices:

The SAR test exclusion thresholds for below 100 MHz at test separation distances ≤ 50 mm are determined by step c) 2):

- c) For frequencies below 100 MHz, the following may be considered for SAR test exclusion:
- 1) For test separation distances > 50 mm and < 200 mm, the power threshold at the corresponding test separation distance at 100 MHz in step b) is multiplied by $[1 + \log(100 / f(\text{MHz}))]$
 - 2) For test separation distances ≤ 50 mm, the power threshold determined by the equation in c) 1) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$

Numeric exemption threshold:

P_{th} step c) [mW]:	918.38
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Radio specification and use-case for this device are below:

f [MHz]:	0.1342
d [mm]:	0
Maximum average output power [mW]:	519

f [MHz]: Operating frequency

d [mm]: Minimum separation distance

Maximum average output power [mW]: timed-average power

This is less than P_{th} step c), so SAR test is exemption for this device.

Thank you for your attention to this matter.



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