

Portable device

According to §15.247(e)(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB447498 D01 General RF Exposure Guidance V05

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:

$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})]^*$

$[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

$f(\text{GHz})$ is the RF channel transmit frequency in GHz;

Power and distance are rounded to the nearest mW and mm before calculation;

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.

We use 5mm as separation distance to calculated.

Maximum measured transmitter power:

Transmit Frequency (GHz)	Mode	Measured Power (dBm)	Tune-up power (dBm)	Max tune-up power(dBm)	Result calculation	1-g SAR
2.402	GFSK	1.939	2 ± 1	3	0.6185	3.00
2.441	GFSK	2.994	2 ± 1	3	0.6235	3.00
2.480	GFSK	2.698	2 ± 1	3	0.6284	3.00
2.402	$\pi/4$ -DQPSK	-2.311	-2 ± 1	-1	0.2462	3.00
2.441	$\pi/4$ -DQPSK	-1.231	-2 ± 1	-1	0.2482	3.00
2.480	$\pi/4$ -DQPSK	-1.696	-2 ± 1	-1	0.2502	3.00
2.402	8-DPSK	-1.588	-1 ± 1	0	0.3100	3.00
2.441	8-DPSK	-0.206	-1 ± 1	0	0.3125	3.00
2.480	8-DPSK	-0.605	-1 ± 1	0	0.3150	3.00

Conclusion:

For the max result $0.6284 \leq 3.0$ for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

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