

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	-3.668	-3 ± 1	-2	0.196	3.00
2.441	GFSK	-1.520	-1 ± 1	0	0.312	3.00
2.480	GFSK	0.124	0 ± 1	1	0.397	3.00
2.402	$\pi/4$ -DQPSK	-5.929	-5 ± 1	-4	0.123	3.00
2.441	$\pi/4$ -DQPSK	-3.492	-3 ± 1	-2	0.197	3.00
2.480	$\pi/4$ -DQPSK	-1.803	-1 ± 1	0	0.315	3.00
2.402	8-DPSK	-5.935	-5 ± 1	-4	0.123	3.00
2.441	8-DPSK	-3.478	-3 ± 1	-2	0.197	3.00
2.480	8-DPSK	-1.798	-1 ± 1	0	0.315	3.00
2.402	GFSK	-1.095	-1 ± 1	0	0.310	3.00
2.440	GFSK	-1.456	-1 ± 1	0	0.312	3.00
2.480	GFSK	-0.859	0 ± 1	1	0.397	3.00

Conclusion:

For the max result $0.397 \leq 3.0$ for 1-g SAR extremity SAR, No SAR is required.

Sincerely,



Signature

Company Name: Emttek (Shenzhen) Co., Ltd.

Address: Bldg 69, Majialong Industry Zone, NanshanDistrict, Shenzhen, China.

David Lee/ Manager