

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 TCB Exclusions list, no SAR required if power is lower than the following threshold:

Frequency Range		Center frequency (MHz)	60/f SAR Limitation (mw)
Low Frequency (MHz)	Low Frequency(MHz)		
2402	2480	2440	25

Maximum measured transmitter power:

Conducted Power (mw)	Max Antenna Gain (dBi)	EIRP (mw)
3.98	4.4	10.97

Threshold at which no SAR required is 25 mw.

Maximum Tx power is 10.97mw EIRP.

Conclusion: No SAR is required.