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 KDB 447498 (2)(a)(i)

For portable device, the power limit is 60/f(in GHz) mW

For limit 60/f is equal:

60/2.402=24.97mW

60/2.441=24.58 mW

60/2.480=24.19mW

Maximum measured transmitter power

MAX Conducted Power (dBm)	Max Antenna Gain (dBm)	EIRP (dBm)	EIRP (mW)
-0.21	-2.0	-2.21	0.60

The max.output power E.I.R.P is 0.60mW<24.97mW

Conclusion: No SAR is required.