



August 22, 2014

Simple Matters  
3050-C Airport Ave.  
Santa Monica, CA, 90405

Model: ditto radio

FCC ID: 2AB7P-0001 IC: 11900A-0001

Washington Laboratories, Ltd. performed a SAR Evaluation on the ditto radio device. This product is a portable transmitter using Bluetooth LE Technology, operating between 2402MHz and 2480MHz. It is designed to be worn by the user with a separation distance  $\leq$  5mm and therefore SAR must be considered.

The EUT was tested under FCC Part 15.247 as a DTS device and the maximum measured conducted power was determined as 2.14mW (3.3dBm), the antenna gain is stated as 3.32dBi for a total EIRP of 6.62dBm (4.59mW). The manufacturer declares that the maximum output power including a tune-up tolerance of 2.5mW (3.98dBm) for a total output EIRP of 7.3dBm (5.38mW). Documentation of the measurement technique used and test data measured can be found in Washington Laboratory Report 13474-01.

Referring to the FCC Document, 447498 D01 General RF Exposure Guidance v05r01, Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies, section 4.1 allows for the exclusion of SAR Testing if the device meets the following requirements:

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR}$$

Where:

- $f$  (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
- When the minimum *test separation distance* is  $< 5$  mm, a distance of 5 mm is used

Using the above formula and highest power:

$$(5\text{mW} \div 5) * \sqrt{2.402} = 1.55 \leq 3.0$$

$$(5\text{mW} \div 5) * \sqrt{2.440} = 1.56 \leq 3.0$$

$$(5\text{mW} \div 5) * \sqrt{2.480} = 1.67 \leq 3.0$$

Therefore, the EUT does not require SAR Testing.

Testing was performed on an Open Area Test Site (OATS) of Washington Laboratories, Ltd, 7560 Lindbergh Drive, Gaithersburg, MD 20879. Site description and site attenuation data have been placed on file with the FCC's Sampling and Measurements Branch at the FCC laboratory in Columbia, MD. Washington Laboratories, Ltd. has been accepted by the FCC and approved by ACLASS under Certificate AT-1448 as an independent FCC test laboratory.

These tests are accredited and meet the requirements of ISO/IEC 17025 as verified by the ANSI-ASQ National Accreditation Board/ACCLASS. Refer to certificate and scope of accreditation AT-1448.

Should you have any questions, please do not hesitate to contact us.

Sincerely,



James Ritter  
EMC Compliance Engineer



Steven D. Koster  
Vice President