

November 21, 2014

UL Kashima, Inc.
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FCC ID: AK8SSEBTR1

To whom it may concern,

We, UL Japan, Inc., hereby declare that Smart B-Trainer, model : SSE-BTR 1 (FCC ID: AK8SSEBTR1) of Sony Corporation is exempt from RF exposure SAR evaluation as its output power meets the exclusion limits stated in FCC Part 2 §2.1093.

KDB 447498D01(v05r02) has the following exclusion for portable devices:

The 1g and 10g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$\frac{[(\text{maximum average output power with tolerance (mW)})/(\text{Minimum separation distance(mm)})] \cdot \sqrt{f \text{ (GHz)}}}{\leq 3.0 \text{ for 1g SAR and } \leq 7.5 \text{ for 10g extremity SAR where}}$$

- 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

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.

This device $f = 2.48$ GHz, distance = 5mm (minimum separation distance: 5 mm was used in the calculation) and the maximum average output power with tolerance was 2 mW (Output power in Theory of Operation)

So for this device:

$2 \text{ mW} [\text{maximum average output power with tolerance}] / 5 \text{ mm} [\text{minimum separation distance}] * (\sqrt{2.48}) = 0.6$

*This is less than 3.0, so no SAR is required.

Thank you for your attention to this matter.



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