



SAR EVALUATION REPORT

**FCC 47 CFR § 2.1093
IEEE Std 1528-2013**

For

Low Power Data Transceiver

FCC ID: IPH-04954

Model Name: A04954

**Report Number: R15651588-S1
Issue Date: 2025-04-03**

Prepared for

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Revision History

Rev.	Date	Revisions	Revised By
V1	2025-04-03	Initial Issue	-

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1. Attestation of Test Results

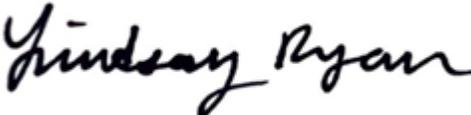
Applicant Name	Garmin International Inc.
FCC ID	IPH-04954
Model Name	A04954
Applicable Standards	Published RF exposure KDB procedures IEEE Std 1528-2013
Date Evaluated	2025-04-03
Test Results	Compliant

UL LLC tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

This report contains data provided by the customer which can impact the validity of results. UL LLC is only responsible for the validity of results after the integration of the data provided by the customer.

The results documented in this report apply only to the tested sample, under the conditions and modes of operation as described herein. It is the manufacturer's responsibility to assure that additional production units of this model are manufactured with identical electrical and mechanical components. All samples tested were in good operating condition throughout the entire test program. Measurement Uncertainties are published for informational purposes only and were not taken into account unless noted otherwise.

This document may not be altered or revised in any way unless done so by UL LLC and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by UL LLC will constitute fraud and shall nullify the document. This report must not be used by the client to claim product certification, approval, or endorsement by A2LA, NIST, or any agency of the U.S. Government, or any agency of the U.S. government.

Approved & Released By: 	Prepared By: 
Lindsay Ryan Engineer Project Associate UL LLC	Sarah Kuhaneck Engineer Project Associate UL LLC

2. Test Specification, Methods and Procedures

All calculations were made in accordance with FCC KDB 447498 D01 v07 and RSS-102 Issue 5

3. Accreditation

UL LLC is accredited by A2LA, cert. # 0751.06.

4. Device Under Test (DUT) Information

4.1. DUT Description

The DUT is a wireless device with a BLE and ANT radio transceiver. The antenna to user separation distance was assumed to be 0 mm as this is the most conservative condition.

4.2. Wireless Technologies and Maximum Output Power

Wireless Technology	Frequency Band	Maximum Output Power		Antenna Gain dBi	E.I.R.P		E.R.P	
		dBm	mW		dBm	mW	dBm	mW
Bluetooth LE	2450	4.00	2.51	1.45	5.45	3.51	3.30	2.14
ANT	2450	4.00	2.51	1.45	5.45	3.51	3.30	2.14

Notes:

E.I.R.P = Maximum Output Power + Antenna Gain

E.R.P = E.I.R.P – 2.15

5. FCC Standalone SAR Test Exclusion Considerations

Since the *Dedicated Host Approach* is applied, the standalone SAR test exclusion procedure in KDB 447498 D01 § 4.3.1 is applied in conjunction with KDB 616217 § 4.3 to determine the minimum test separation distance:

- When the separation distance from the antenna to an adjacent edge is ≤ 5 mm, a distance of 5 mm is applied to determine SAR test exclusion.
- When the separation distance from the antenna to an adjacent edge is > 5 mm, the actual antenna-to-edge separation distance is applied to determine SAR test exclusion.

SAR Test Exclusion Calculations for WLAN

Antennas < 50 mm to Edges

1g Exclusion:

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)		Calculated Threshold Value	
		dBm	mW	Back	Front	Back	Front
Bluetooth LE	2480	4.0	2.5	6.0	9.9	0.7 -EXEMPT-	0.4 -EXEMPT-
ANT	2480	4.0	2.5	6.0	9.9	0.7 -EXEMPT-	0.4 -EXEMPT-

Note(s):

According to KDB 447498 D01, if the calculated threshold value is >3 then SAR testing is required.

10g Exclusion:

Tx Interface	Frequency (MHz)	Output Power		Separation Distances (mm)						Calculated Threshold Value					
		dBm	mW	Back	Front	Edge Top	Edge Right	Edge Bottom	Edge Left	Back	Front	Edge Top	Edge Right	Edge Bottom	Edge Left
Bluetooth LE	2480	4.0	2.5	6.0	9.9	39.9	6.8	18.5	43.8	0.7 -EXEMPT-	0.4 -EXEMPT-	0.1 -EXEMPT-	0.6 -EXEMPT-	0.2 -EXEMPT-	0.1 -EXEMPT-
ANT	2480	4.0	2.5	6.0	9.9	39.9	6.8	18.5	43.8	0.7 -EXEMPT-	0.4 -EXEMPT-	0.1 -EXEMPT-	0.6 -EXEMPT-	0.2 -EXEMPT-	0.1 -EXEMPT-

Note(s):

According to KDB 447498 D01, if the calculated threshold value is >7.5 then SAR testing is required.