



Federal Communication Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road
Columbia, MD 21048

October 11, 2013

TO WHOM IT MAY CONCERN

Dear Sir/Madam,

Herewith we confirm that the transmitter emission from the product:

<u>FCC ID Number</u>	<u>Trade Name/Model</u>
<i>KWCTX18</i>	<i>Roger Clip-On Mic</i>

is in compliance with the exposure limits for maximum permissible exposure specified in §1.1310, §1.1307(b)(1) and (2), §2.1093(c) of 47 C.F.R. and are categorically excluded from routine RF evaluation. Furthermore, according to section 4.3.1 of the FCC guidance for RF exposure evaluation of mobile and portable devices (KDB publication 447498 D01 General RF exposure guidance) standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or simulation, is not required when the corresponding SAR Exclusion Threshold condition is satisfied. The above mentioned product is a portable device as defined in §2.1093(b) of 47 CFR, operate in the frequency range 2.402-2.480 GHz with maximum conducted output power of 9.5 mW (9.8 dBm) including the tune-up tolerance. The maximum conducted output power for the above mentioned product was measured to be 9.44 mW (9.75 dBm) at 2.402 GHz and the test results are provided within the submitted FCC test report No: 13-MO-0087.12A. Following the formula in section 4.3.1 (1) for the range 100 MHz to 6 GHz and using the most conservative separation distance of 5 mm we obtain a result of 2.9 which is lower than the 1-g SAR test exclusion threshold. Therefore, the above mentioned product qualify for SAR test exclusion and in lieu of SAR report we are submitting this statement of justification and compliance.

If you have any questions, please feel free to contact me at the address shown below.

Sincerely,

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