

4 FCC §2.1093 & §15.407(f) - RF Exposure

4.1 Applicable Standard

According to FCC KDB 447498 D01 General RF Exposure Guidance v05r02 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

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

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

- $f(\text{GHz})$ 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
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

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 according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:

- [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · ($f(\text{MHz})/150$)] mW, at 100 MHz to 1500 MHz
- [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:

- The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm
- The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm

- c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

4.2 RF Exposure Evaluation Results

Customer declares the separation distance between antenna and user's hand is 10mm.

The turn-up conducted power report was 6.01 dBm (3.99 mW).

According to KDB 447498D01, $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR.

$(3.99/10) * \sqrt{5.24} = 0.913$ which is less than 7.5

SAR testing for this device is excluded.