



**ZENNER**  
All that counts.

January 12, 2017

American Certification Body  
6731 Whittier Ave  
C110  
McLean, VA 22101

Attn:  
Gregory Czumak  
Review Engineer

RE: Zenner Performance Meters d.b.a. Zenner USA  
FCC ID: 2ACOABTIR  
Ref: ATCB020351

Mr. Czumak,

Per your request, Zenner is providing a statement regarding the control of transmission times to reduce RF Exposure to below the SAR limit.

Zenner has established operational controls in the firmware of the BTIR that limits the transmission duty cycle to 39%. This allows the BTIR to qualify for the FCC SAR Exclusion per FCC Document, 447498 D01 General RF Exposure Guidance v05r02, Mobile and Portable Devices RF Exposure Procedures and Equipment Authorization Policies, section 4.1.

The mechanism is as follows:

Over any 30 minute time period the percentage of transmission duty cycle is calculated and if it exceeds 39%, the transmitter is disabled. This uses a moving average of the most recent 30 minute period. The granularity of the transmit on-time is 100uSec. The transmitter is re-enabled when the moving average is less than 39% at the start of the next period.

Sincerely,

Kenneth J. Derry P.E.  
Hardware Development Engineer