



PART 2 RF EXPOSURE EVALUATION REPORT

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11/15/2021 – 12/03/2021
Test Site/Location:
PCTEST, Columbia, MD, USA
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FCC ID: **2ABGH-R678L5**

APPLICANT: **RELIANCE COMMUNICATIONS LLC**

DUT Type: Portable Handset
Application Type: Class II Permissive Change
FCC Rule Part(s): CFR §2.1093
Model: R678L5
Permissive Change(s): See FCC Change Document
Device Serial Numbers: Pre-Production Samples [10681]
Date of Original Certification: 06/16/2021

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them. Test results reported herein relate only to the item(s) tested.





Randy Ortanez
President



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1 DEVICE UNDER TEST

1.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
GSM 850	Voice/Data	824.20 - 848.80 MHz
GSM 1900	Voice/Data	1850.20 - 1909.80 MHz
WCDMA Band II	Voice/Data	1852.4 - 1907.6 MHz
WCDMA Band IV	Voice/Data	1712.4 - 1752.6 MHz
WCDMA Band V	Voice/Data	826.4 - 846.6 MHz
LTE Band 2	Voice/Data	1850.7 - 1909.3 MHz
LTE Band 4	Voice/Data	1710.7 - 1754.3 MHz
LTE Band 5	Voice/Data	824.7 - 848.3 MHz
LTE Band 12	Voice/Data	699.7 - 715.3 MHz
LTE Band 13	Voice/Data	779.5 - 784.5 MHz
LTE Band 46 (Rx Only)	Voice/Data	5150 - 5925 MHz
LTE Band 66	Voice/Data	1710.7 - 1779.3 MHz
5G NR n2	Voice/Data	1852.5 - 1907.5 MHz
5G NR n5	Voice/Data	826.5 - 846.5 MHz
5G NR n66	Voice/Data	1712.5 - 1777.5 MHz
5G NR n77	Voice/Data	3705 - 3975 MHz
NR n260	Data	37000 - 40000 MHz
NR n261	Data	27500 - 28350 MHz
WLAN 2.4GHz	Voice/Data	2412 - 2472 MHz
WLAN 5.2GHz	Voice/Data	5180 - 5240 MHz
WLAN 5.3GHz	Voice/Data	5260 - 5320 MHz
WLAN 5.6GHz	Voice/Data	5500 - 5720 MHz
WLAN 5.8GHz	Voice/Data	5745 - 5825 MHz
Bluetooth	Data	2402 - 2480 MHz

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1.2 Time-Averaging Algorithm for RF Exposure Compliance

This device is enabled with Qualcomm® Smart Transmit feature. This feature performs time averaging algorithm in real time to control and manage transmitting power and ensure the time-averaged RF exposure is in compliance with FCC requirements all the time. DUT contains embedded file system (EFS) version 15 configured for the first generation (GEN1) for Sub6 and mmWave.

The Smart Transmit algorithm maintains the time-averaged transmit power, in turn, time-averaged RF exposure of SAR_design_target or PD_design_target, below the predefined time-averaged power limit (i.e., P_{limit} for sub-6 radio, and input.power.limit for 5G mmW NR), for each characterized technology and band.


Smart Transmit allows the device to transmit at higher power instantaneously, as high as P_{max}, when needed, but enforces power limiting to maintain time-averaged transmit power to P_{limit} for frequencies < 6 GHz and input.power.limit for frequencies > 6 GHz.

Note that the device uncertainty for sub-6GHz WWAN is 1.0dB for this DUT, the device uncertainty for mmW is 2.1 dB, and the reserve power margin is 3 dB.

This purpose of the Part 2 report is to demonstrate the DUT complies with FCC RF exposure requirement under Tx varying transmission scenarios, thereby validity of Qualcomm® Smart Transmit feature implementation in this device. It serves to compliment the Part 0 and Part 1 Test Reports to justify compliance per FCC.

1.3 Test Scope

This report contains the smart transmit evaluation for frequencies above 6 GHz. Smart transmit evaluation for frequencies below 6 GHz can be found in a separate report.

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2 RF EXPOSURE LIMITS

2.1 Uncontrolled Environment

UNCONTROLLED ENVIRONMENTS are defined as locations where there is the exposure of individuals who have no knowledge or control of their exposure. The general population/uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity.

2.2 Controlled Environment

CONTROLLED ENVIRONMENTS are defined as locations where there is exposure that may be incurred by persons who are aware of the potential for exposure, (i.e. as a result of employment or occupation). In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

2.3 RF Exposure Limits for Frequencies Above 6 GHz

Per §1.1310 (d)(3), the MPE limits are applied for frequencies above 6 GHz. Power Density is expressed in units of W/m² or mW/cm².

Peak Spatially Averaged Power Density was evaluated over a circular area of 4 cm² per interim FCC Guidance for near-field power density evaluations per October 2018 TCB Workshop notes.

**Table 2-1
Human Exposure Limits Specified in FCC 47 CFR §1.1310**

Human Exposure to Radiofrequency (RF) Radiation Limits		
Frequency Range [MHz]	Power Density [mW/cm ²]	Averaging Time [Minutes]
(A) Limits for Occupational / Controlled Environments		
1,500 – 100,000	5.0	6
(B) Limits for General Population / Uncontrolled Environments		
1,500 – 100,000	1.0	30

Note: 1.0 mW/cm² is 10 W/m²

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2.4 Time Averaging Windows for FCC Compliance

Per October 2018 TCB Workshop Notes, the below time-averaging windows can be used for assessing time-averaged exposures for devices that are capable of actively monitoring and adjusting power output over time to comply with exposure limits.

Interim Guidance	Frequency (GHz)	Maximum Averaging Time (sec)
SAR	< 3	100
	3 – 6	60
MPE	6 - 10	30
	10 - 16	14
	16 – 24	8
	24 – 42	4
	42 – 95	2

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3 TIME VARYING TRANSMISSION TEST CASES

To validate the time averaging feature and demonstrate the compliance in Tx varying transmission conditions, the following transmission scenarios are covered in the Part 2 test:

1. During a time-varying Tx power transmission: To prove that the Smart Transmit feature accounts for Tx power variations in time accurately.
2. During an antenna (or beam) switch: To prove that the Smart Transmit feature functions correctly during transitions in antenna (such as AsDiv scenario) or beams (different antenna array configurations) or beams (different antenna array configurations).
3. SAR vs. PD exposure switching during sub-6+mmW transmission: To prove that the Smart Transmit feature functions correctly and ensures total RF exposure compliance during transitions in SAR dominant exposure, SAR+PD exposure, and PD dominant exposure scenarios.

As described in Part 0 report, the RF exposure is proportional to the Tx power for a SAR- and PD-characterized wireless device. Thus, feature validation in Part 2 can be effectively performed through conducted (for $f < 6\text{GHz}$) and radiated (for $f \geq 6\text{GHz}$) power measurement. Therefore, the compliance demonstration under dynamic transmission conditions and feature validation are done in conducted/radiated power measurement setup for transmission scenario 1 through 3.

To add confidence in the feature validation, the time-averaged SAR and PD measurements are also performed but only performed for transmission scenario 1 to avoid the complexity in SAR and PD measurement.

The strategy for testing in Tx varying transmission condition is outlined as follows:

- Demonstrate the total RF exposure averaged over FCC defined time windows does not exceed FCC's SAR and PD limits, through time-averaged power measurements
 - Measure conducted Tx power (for $f < 6\text{GHz}$) versus time, and radiated Tx power (EIRP for $f > 10\text{GHz}$) versus time.
 - Convert it into RF exposure and divide by respective FCC limits to get normalized exposure versus time.
 - Perform running time-averaging over FCC defined time windows.
 - Demonstrate that the total normalized time-averaged RF exposure is less than 1 for all transmission scenarios (i.e., transmission scenarios 1, 2, 3, 4, 5, 6, 7, and 8) at all times.

Mathematical expression:

For sub-6+mmW transmission:

$$1g_or_10gSAR(t) = \frac{conducted_Tx_power(t)}{conducted_Tx_power_P_{limit}} * 1g_or_10gSAR_P_{limit} \quad (1a)$$

$$4cm^2PD(t) = \frac{radiated_Tx_power(t)}{radiated_Tx_power_input.power.limit} * 4cm^2PD_input.power.limit \quad (1b)$$

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$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC SAR limit} + \frac{\frac{1}{T_{PD}} \int_{t-T_{PD}}^t 4cm^2 PD(t) dt}{FCC 4cm^2 PD limit} \leq 1 \quad (1c)$$

where, *conducted_Tx_power(t)*, *conducted_Tx_power_Plimit*, and *1g_or_10gSAR_Plimit* correspond to the measured instantaneous conducted Tx power, measured conducted Tx power at *Plimit*, and measured 1gSAR or 10gSAR values at *Plimit* corresponding to sub-6 transmission. Similarly, *radiated_Tx_power(t)*, *radiated_Tx_power_input.power.limit*, and *4cm²PD_input.power.limit* correspond to the measured instantaneous radiated Tx power, radiated Tx power at *input.power.limit* (i.e., radiated power limit), and 4cm²PD value at *input.power.limit* corresponding to mmW transmission. Both *Plimit* and *input.power.limit* are the parameters pre-defined in Part 0 and loaded via Embedded File System (EFS) onto the EUT. *T_{SAR}* is the FCC defined time window for sub-6 radio; *T_{PD}* is the FCC defined time window for mmW radio.

- Demonstrate the total RF exposure averaged over FCC defined time windows does not exceed FCC’s SAR and PD limits, through time-averaged SAR and PD measurements. Note as mentioned earlier, this measurement is performed for transmission scenario 1 only.
 - For sub-6 transmission only, measure instantaneous SAR versus time; for LTE+sub6 NR transmission, request low power (or all-down bits) on LTE so that measured SAR predominantly corresponds to sub6 NR.
 - For LTE + mmW transmission, measure instantaneous E-field versus time for mmW radio and instantaneous conducted power versus time for LTE radio.
 - Convert it into RF exposure and divide by respective FCC limits to obtain normalized exposure versus time.
 - Perform time averaging over FCC defined time window.
 - Demonstrate that the total normalized time-averaged RF exposure is less than 1 for transmission scenario 1 at all times.

Mathematical expression:




- For LTE+mmW transmission:

$$1g_or_10gSAR(t) = \frac{conducted_Tx_power(t)}{conducted_Tx_power_Plimit} * 1g_or_10gSAR_Plimit \quad (2a)$$

$$4cm^2 PD(t) = \frac{[pointE(t)]^2}{[pointE_input.power.limit]^2} * 4cm^2 PD_input.power.limit \quad (2b)$$

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC SAR limit} + \frac{\frac{1}{T_{PD}} \int_{t-T_{PD}}^t 4cm^2 PD(t) dt}{FCC 4cm^2 PD limit} \leq 1 \quad (2c)$$

where, *pointSAR(t)*, *pointSAR_Plimit*, and *1g_or_10gSAR_Plimit* correspond to the measured instantaneous point SAR, measured point SAR at *Plimit*, and measured 1gSAR or 10gSAR values at *Plimit* corresponding to sub-6 transmission. Similarly, *pointE(t)*, *pointE_input.power.limit*, and *4cm²PD_input.power.limit* correspond to the measured instantaneous E-field, E-field at *input.power.limit*, and 4cm²PD value at *input.power.limit* corresponding to mmW transmission.

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Note: cDASY6 measurement system by Schmid & Partner Engineering AG (SPEAG) of Zurich, Switzerland measures relative E-field, and provides ratio of $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$ versus time.

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This section provides the test plan and test procedures for validating Qualcomm Smart Transmit feature for mmW transmission. For this EUT, millimeter wave (mmW) transmission is only in non-standalone mode, i.e., it requires an LTE link as anchor.

4.1 Test sequence for validation in mmW NR transmission

In 5G mmW NR transmission, the test sequence for validation is with the callbox requesting EUT's Tx power in 5G mmW NR at maximum power all the time.

4.2 Test configuration selection criteria for validating Smart Transmit feature

4.2.1 Test configuration selection for time-varying Tx power transmission

The Smart Transmit time averaging feature operation is independent of bands, modes, channels, and antenna configurations (beams) for a given technology. Hence, validation of Smart Transmit in any one band/mode/channel per technology is sufficient.

4.2.2 Test configuration selection for change in antenna configuration (beam)

The Smart Transmit time averaging feature operation is independent of bands, modes, channels, and antenna configurations (beams) for a given technology. Hence, validation of Smart Transmit with beam switch between any two beams is sufficient.

4.2.3 Test configuration selection for SAR vs. PD exposure switch during transmission

The Smart Transmit time averaging feature operation is independent of the nature of exposure (SAR vs. PD) and ensures total time-averaged RF exposure compliance. Hence, validation of Smart Transmit in any one band/mode/channel/beam for mmW + sub-6 (LTE) transmission is sufficient, where the exposure varies among SAR dominant scenario, SAR+PD scenario, and PD dominant scenario.

4.3 Test procedures for mmW radiated power measurements

Perform conducted power measurement (for $f < 6\text{GHz}$) and radiated power measurement (for $f > 6\text{GHz}$) for LTE + mmW transmission to validate Smart Transmit time averaging feature in the various transmission scenarios described in Section 3.

This section provides general conducted power measurement procedures to perform compliance test under dynamic transmission scenarios described in Section 3. In practice, an adjustment can be made in these procedures. The justification/clarification may be provided.

4.3.1 Time-varying Tx power scenario

The purpose of the test is to demonstrate the effectiveness of power limiting enforcement and that the time-averaged Tx power when converted into RF exposure values does not exceed the FCC limit at all times (see Eq. (1a), (1b) & (1c) in Section 3).

Test procedure:

1. Measure conducted Tx power corresponding to P_{limit} for LTE in selected band, and measure radiated Tx power corresponding to *input.power.limit* in desired mmW band/channel/beam by following below steps:

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- a. Measure radiated power corresponding to mmW *input.power.limit* by setting up the EUT's Tx power in desired band/channel/beam at *input.power.limit* in Factory Test Mode (FTM). This test is performed in a calibrated anechoic chamber. Rotate the EUT to obtain maximum radiated Tx power, keep the EUT in this position and do not disturb the position of the EUT inside the anechoic chamber for the rest of this test.
 - b. Reset EUT to place in online mode and establish radio link in LTE, measure conducted Tx power corresponding to LTE P_{limit} with Smart Transmit enabled and *Reserve_power_margin* set to 0 dB, callbox set to request maximum power.
2. Set *Reserve_power_margin* to actual (intended) value and reset power on EUT to enable Smart Transmit. With EUT setup for a mmW NR call in the desired/selected LTE band and mmW NR band, perform the following steps:
- a. Establish LTE and mmW NR connection in desired band/channel/beam used in Step 1. As soon as the mmW connection is established, immediately request all-down bits on LTE link. With callbox requesting EUT's Tx power to be at maximum mmW power to test predominantly PD exposure scenario (as SAR exposure is less when LTE's Tx power is at low power).
 - b. After 120s, request LTE to go all-up bits for at least 100s. SAR exposure is dominant. There are two scenarios:
 - i If $P_{limit} < P_{max}$ for LTE, then the RF exposure margin (provided to mmW NR) gradually runs out (due to high SAR exposure). This results in gradual reduction in the 5G mmW NR transmission power and eventually seized 5G mmW NR transmission when LTE goes to $P_{reserve}$ level.
 - ii If $P_{limit} \geq P_{max}$ for LTE, then the 5G mmW NR transmission's averaged power should gradually reduce but the mmW NR connection can sustain all the time (assuming TxAGC uncertainty = 0dB).
 - c. Record the conducted Tx power of LTE and radiated Tx power of mmW for the full duration of this test of at least 300s.
3. Once the measurement is done, extract instantaneous Tx power versus time for both LTE and mmW links. Convert the conducted Tx power for LTE into 1gSAR or 10gSAR value using Eq. (2a) and P_{limit} measured in Step 1.b, and then divide by FCC limit of 1.6 W/kg for 1gSAR or 4.0 W/kg for 10gSAR to obtain instantaneous normalized 1gSAR or 10gSAR versus time. Perform 100s running average to determine normalized 100s-averaged 1gSAR or 10gSAR versus time.

NOTE: In Eq.(2a), instantaneous Tx power is converted into instantaneous 1gSAR or 10gSAR value by applying the measured worst-case 1gSAR or 10gSAR value at P_{limit} for the corresponding technology/band/antenna/DSI reported in Part 1 report.

4. Similarly, convert the radiated Tx power for mmW into 4cm²PD value using Eq. (2b) and the radiated Tx power limit (i.e., radiated Tx power at *input.power.limit*) measured in Step 1.a, then divide by FCC 4cm²PD limit of 10W/m² to obtain instantaneous normalized 4cm²PD versus time. Perform 4s running average to determine normalized 4s-averaged 4cm²PD versus time.

NOTE: In Eq.(2b), instantaneous radiated Tx power is converted into instantaneous 4cm²PD by applying the worst-case 4cm²PD value measured at *input.power.limit* for the selected band/beam in Part 1 report.

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- Make one plot containing: (a) instantaneous conducted Tx power for LTE versus time, (b) computed 100s-averaged conducted Tx power for LTE versus time, (c) instantaneous radiated Tx power for mmW versus time, as measured in Step 2, (d) computed 4s-averaged radiated Tx power for mmW versus time, and (e) time-averaged conducted and radiated power limits for LTE and mmW radio using Eq. (3a) & (3b), respectively:

$$\text{Time averaged LTE power limit} = \text{meas. } P_{\text{limit}} + 10 \times \log\left(\frac{\text{FCC SAR limit}}{\text{meas.SAR}_P\text{limit}}\right) \quad (3a)$$

$$\text{Time averaged mmW NR power limit} = \text{meas. EIRP}_{\text{input.power.limit}} + 10 \times \log\left(\frac{\text{FCC PD limit}}{\text{meas.PD}_{\text{input.power.limit}}}\right) \quad (3b)$$

where $\text{meas. EIRP}_{\text{input.power.limit}}$ and $\text{meas. PD}_{\text{input.power.limit}}$ correspond to measured EIRP at input.power.limit and measured power density at input.power.limit .

- Make another plot containing: (a) computed normalized 100s-averaged 1gSAR or 10gSAR versus time determined in Step 3, (b) computed normalized 4s-averaged 4cm²PD versus time determined in Step 4, and (c) corresponding total normalized time-averaged RF exposure (sum of steps (6.a) and (6.b)) versus time.

The validation criteria are, at all times, the total normalized time-averaged RF exposure versus time determined in Step 6.c shall not exceed the normalized limit of 1.0 of FCC requirement (i.e., Eq. (1c)).

4.3.2 Switch in SAR vs. PD exposure during transmission

This test is to demonstrate that Smart Transmit feature is independent of the nature of exposure (SAR vs. PD), accurately accounts for switching in exposures among SAR dominant, SAR+PD, and PD dominant scenarios, and ensures total time-averaged RF exposure compliance.

Test procedure:

- Measure conducted Tx power corresponding to P_{limit} for LTE in selected band, and measure radiated Tx power corresponding to input.power.limit in desired mmW band/channel/beam by following below steps:
 - Measure radiated power corresponding to input.power.limit by setting up the EUT's Tx power in desired band/channel/beam at input.power.limit in FTM. This test is performed in a calibrated anechoic chamber. Rotate the EUT to obtain maximum radiated Tx power, keep the EUT in this position and do not disturb the position of the EUT inside the anechoic chamber for the rest of this test.
 - Reset EUT to place in online mode and establish radio link in LTE, measure conducted Tx power corresponding to LTE P_{limit} with Smart Transmit enabled and $\text{Reserve_power_margin}$ set to 0 dB, callbox set to request maximum power.
- Set $\text{Reserve_power_margin}$ to actual (intended) value and reset power in EUT, with EUT setup for LTE + mmW call, perform the following steps:
 - Establish LTE (sub-6) and mmW NR connection with callbox.
 - As soon as the mmW connection is established, immediately request all-down bits on LTE link. Continue LTE (all-down bits) + mmW transmission for more than 100s duration to test predominantly PD exposure scenario (as SAR exposure is negligible from all-down bits in LTE).
 - After 120s, request LTE to go all-up bits, mmW transmission should gradually run out of RF exposure margin if LTE's $P_{\text{limit}} < P_{\text{max}}$ and seize mmW transmission (SAR only scenario); or mmW transmission should gradually reduce in Tx power and will sustain the connection if LTE's $P_{\text{limit}} > P_{\text{max}}$.

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- d. After 75s, request LTE to go all-down bits, mmW transmission should start getting back RF exposure margin and resume transmission again.
 - e. Record the conducted Tx power of LTE and radiated Tx power of mmW for the entire duration of this test of at least 300s.
3. Once the measurement is done, extract instantaneous Tx power versus time for both LTE and mmW links. Convert the conducted Tx power for LTE into 1gSAR or 10gSAR value using Eq. (1a) and P_{limit} measured in Step 1.b, and then divide by FCC limit of 1.6 W/kg for 1gSAR or 4.0 W/kg for 10gSAR to obtain instantaneous normalized 1gSAR or 10gSAR versus time. Perform 100s running average to determine normalized 100s-averaged 1gSAR or 10gSAR versus time.

NOTE: In Eq.(1a), instantaneous Tx power is converted into instantaneous 1gSAR or 10gSAR value by applying the measured worst-case 1gSAR or 10gSAR value at P_{limit} for the corresponding technology/band/antenna/DSI reported in Part 1 report.

4. Similarly, convert the radiated Tx power for mmW into 4cm²PD value using Eq. (1b) and the radiated Tx power limit (i.e., radiated Tx power at *input.power.limit*) measured in Step 1.a, then divide this by FCC 4cm²PD limit of 10W/m² to obtain instantaneous normalized 4cm²PD versus time. Perform 4s running average to determine normalized 4s-averaged 4cm²PD versus time.

NOTE: In Eq.(1b), instantaneous radiated Tx power is converted into instantaneous 4cm²PD by applying the worst-case 4cm²PD value measured at *input.power.limit* for the selected band/beam in Part 1 report.

5. Make one plot containing: (a) instantaneous conducted Tx power for LTE versus time, (b) computed 100s-averaged conducted Tx power for LTE versus time, (c) instantaneous radiated Tx power for mmW versus time, as measured in Step 2, (d) computed 4s-averaged radiated Tx power for mmW versus time, and (e) time-averaged conducted and radiated power limits for LTE and mmW radio using Eq. (3a) & (3b), respectively.
6. Make another plot containing: (a) computed normalized 100s-averaged 1gSAR or 10gSAR versus time determined in Step 3, (b) computed normalized 4s-averaged 4cm²PD versus time determined in Step 4, and (c) corresponding total normalized time-averaged RF exposure (sum of steps (6.a) and (6.b)) versus time.

The validation criteria are, at all times, the total normalized time-averaged RF exposure versus time determined in Step 6.c shall not exceed the normalized limit of 1.0 of FCC requirement (i.e., Eq. (2c)).

4.3.3 Change in antenna configuration (beam)

This test is to demonstrate the correct power control by Smart Transmit during changes in antenna configuration (beam). Since the *input.power.limit* varies with beam, the Eq. (1a), (1b) and (1c) in Section 3 are written as below for transmission scenario having change in beam,

$$1g_or_10gSAR(t) = \frac{conducted_Tx_power(t)}{conducted_Tx_power_P_{limit}} * 1g_or_10gSAR_P_{limit} \quad (4a)$$

$$4cm^2PD_1(t) = \frac{radiated_Tx_power_1(t)}{radiated_Tx_power_input.power.limit_1} * 4cm^2PD_input.power.limit_1 \quad (4b)$$

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$$4cm^2PD_2(t) = \frac{radiated_Tx_power_2(t)}{radiated_Tx_power_input.power.limit_2} * 4cm^2PD_input.power.limit_2 \quad (4c)$$

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t)dt}{FCC\ SAR\ limit} + \frac{\frac{1}{T_{PD}} \left[\int_{t-T_{PD}}^{t_1} 4cm^2PD_1(t)dt + \int_{t_1}^t 4cm^2PD_2(t)dt \right]}{FCC\ 4cm^2\ PD\ limit} \leq 1 \quad (4d)$$

where, $conducted_Tx_power(t)$, $conducted_Tx_power_P_{limit}$, and $1g_or_10gSAR_P_{limit}$ correspond to the measured instantaneous conducted Tx power, measured conducted Tx power at P_{limit} , and measured $1gSAR$ or $10gSAR$ values at P_{limit} corresponding to LTE transmission. Similarly, $radiated_Tx_power_1(t)$, $radiated_Tx_power_input.power.limit_1$, and $4cm^2PD_input.power.limit_1$ correspond to the measured instantaneous radiated Tx power, radiated Tx power at $input.power.limit$, and $4cm^2PD$ value at $input.power.limit$ of beam 1; $radiated_Tx_power_2(t)$, $radiated_Tx_power_input.power.limit_2$, and $4cm^2PD_input.power.limit_2$ correspond to the measured instantaneous radiated Tx power, radiated Tx power at $input.power.limit$, and $4cm^2PD$ value at $input.power.limit$ of beam 2 corresponding to mmW transmission.

Test procedure:

1. Measure conducted Tx power corresponding to P_{limit} for LTE in selected band, and measure radiated Tx power corresponding to $input.power.limit$ in desired mmW band/channel/beam by following below steps:
 - a. Measure radiated power corresponding to mmW $input.power.limit$ by setting up the EUT's Tx power in desired band/channel at $input.power.limit$ of beam 1 in FTM. Do not disturb the position of the EUT inside the anechoic chamber for the rest of this test. Repeat this Step 1.a for beam 2.
 - b. Reset EUT to place in online mode and establish radio link in LTE, measure conducted Tx power corresponding to LTE P_{limit} with Smart Transmit enabled and $Reserve_power_margin$ set to 0 dB, callbox set to request maximum power.
2. Set $Reserve_power_margin$ to actual (intended) value and reset power in EUT, With EUT setup for LTE + mmW connection, perform the following steps:
 - a. Establish LTE (sub-6) and mmW NR connection in beam 1. As soon as the mmW connection is established, immediately request all-down bits on LTE link with the callbox requesting EUT's Tx power to be at maximum mmW power.
 - b. After beam 1 continues transmission for at least 20s, request the EUT to change from beam 1 to beam 2, and continue transmitting with beam 2 for at least 20s.
 - c. Record the conducted Tx power of LTE and radiated Tx power of mmW for the entire duration of this test.
3. Once the measurement is done, extract instantaneous Tx power versus time for both LTE and mmW links. Convert the conducted Tx power for LTE into $1gSAR$ or $10gSAR$ value using the similar approach described in Step 3 of Section 4.3.2. Perform 100s running average to determine normalized 100s-averaged $1gSAR$ versus time.
4. Similarly, convert the radiated Tx power for mmW NR into $4cm^2PD$ value using Eq. (4b), (4c) and the radiated Tx power limits (i.e., radiated Tx power at $input.power.limit$) measured in Step 1.a for beam 1 and beam 2, respectively, and then divide the resulted PD values by FCC $4cm^2PD$ limit of $10W/m^2$ to obtain instantaneous normalized $4cm^2PD$ versus time for beam 1 and beam 2. Perform 4s running average to determine normalized 4s-averaged $4cm^2PD$ versus time.

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NOTE: In Eq.(4b) and (4c), instantaneous radiated Tx power of beam 1 and beam 2 is converted into instantaneous 4cm²PD by applying the worst-case 4cm²PD value measured at the *input.power.limit* of beam 1 and beam 2 in Part 1 report, respectively.

5. Since the measured radiated powers for beam 1 and beam 2 in Step 1.a were performed at an arbitrary rotation of EUT in anechoic chamber, repeat Step 1.a of this procedure by rotating the EUT to determine maximum radiated power at *input.power.limit* in FTM mode for both beams separately. Re-scale the measured instantaneous radiated power in Step 2.c by the delta in radiated power measured in Step 5 and the radiated power measured in Step 1.a for plotting purposes in next Step. In other words, this step essentially converts measured instantaneous radiated power during the measurement in Step 2 into maximum instantaneous radiated power for both beams. Perform 4s running average to compute 4s-avearged radiated Tx power. Additionally, use these EIRP values measured at *input.power.limit* at respective peak locations to determine the EIRP limits (using Eq. (5b)) for both these beams.
6. Make one plot containing: (a) instantaneous conducted Tx power for LTE versus time, (b) computed 100s-averaged conducted Tx power for LTE versus time, (c) instantaneous radiated Tx power for mmW versus time, as obtained in Step 5, (d) computed 4s-averaged radiated Tx power for mmW versus time, as obtained in Step 5, and (e) time-averaged conducted and radiated power limits for LTE and mmW radio, respectively.
7. Make another plot containing: (a) computed normalized 100s-averaged 1gSAR versus time determined in Step 3, (b) computed normalized 4s-averaged 4cm²PD versus time determined in Step 4, and (c) corresponding total normalized time-averaged RF exposure (sum of steps (6.a) and (6.b)) versus time.

The validation criteria are, at all times, the total normalized time-averaged RF exposure versus time determined in Step 6.c shall not exceed the normalized limit of 1.0 of FCC requirement (i.e., (4d)).

4.4 Test procedure for time-varying PD measurements

The following steps are used to perform the validation through PD measurement for transmission scenario 1 described in Section 3:

1. Place the EUT on the cDASY6 platform to perform PD measurement in the worst-case position/surface for the selected mmW band/beam. In PD measurement, the callbox is set to request maximum Tx power from EUT all the time. Hence, “path loss” calibration between callbox antenna and EUT is not needed in this test.
2. Time averaging feature validation:
 - a. Measure conducted Tx power corresponding to P_{limit} for LTE in selected band, and measure point E-field corresponding to *input.power.limit* in desired mmW band/channel/beam by following the below steps:
 - i. Measure conducted Tx power corresponding to LTE P_{limit} with Smart Transmit enabled and *Reserve_power_margin* set to 0 dB, with callbox set to request maximum power.
 - ii. Measure point E-field at peak location of fast area scan corresponding to *input.power.limit* by setting up the EUT’s Tx power in desired mmW band/channel/beam at *input.power.limit* in FTM. Do not disturb the position of EUT and mmW cDASY6 probe.
 - b. Set *Reserve_power_margin* to actual value (i.e., intended value) and reset power on EUT, place EUT in online mode. With EUT setup for LTE (sub-6) + mmW NR call, as soon as the mmW NR connection is established, request all-down bits on LTE link. Continue LTE (all-down bits) + mmW transmission for more than 100s duration to test predominantly PD exposure scenario. After

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120s, request LTE to go all-up bits, mmW transmission should gradually reduce. Simultaneously, record the conducted Tx power of LTE transmission using power meter and point E-field (in terms of ratio of $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$) of mmW transmission using cDASY6 E-field probe at peak location identified in Step 2.a.ii for the entire duration of this test of at least 300s.

- c. Once the measurement is done, extract instantaneous conducted Tx power versus time for LTE transmission and $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$ ratio versus time from cDASY6 system for mmW transmission. Convert the conducted Tx power for LTE into 1gSAR or 10gSAR value using Eq. (2a) and P_{limit} measured in Step 2.a.i, and then divide this by FCC limit of 1.6 W/kg for 1gSAR or 4.0 W/kg for 10gSAR to obtain instantaneous normalized 1gSAR or 10gSAR versus time. Perform 100s running average to determine normalized 100s-averaged 1gSAR or 10gSAR versus time

NOTE: In Eq.(2a), instantaneous Tx power is converted into instantaneous 1gSAR or 10gSAR value by applying the measured worst-case 1gSAR or 10gSAR value at P_{limit} for the corresponding technology/band reported in Part 1 report.

- d. Similarly, convert the point E-field for mmW transmission into 4cm²PD value using Eq. (2b) and radiated power limit measured in Step 2.a.ii, and then divide this by FCC 4cm²PD limit of 10W/m² to obtain instantaneous normalized 4cm²PD versus time. Perform 4s running average to determine normalized 4s-averaged 4cm²PD versus time.
- e. Make one plot containing: (i) computed normalized 100s-averaged 1gSAR or 10gSAR versus time determined in Step 2.c, (ii) computed normalized 4s-averaged 4cm²PD versus time determined in Step 2.d, and (iii) corresponding total normalized time-averaged RF exposure (sum of steps (2.e.i) and (2.e.ii)) versus time.

The validation criteria are, at all times, the total normalized time-averaged RF exposure versus time determined in Step 2.e.iii shall not exceed the normalized limit of 1.0 of FCC requirement (i.e., Eq. (2c)).

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5.2 Power Density Measurement Test setup

The measurement setup is similar to normal PD measurements, the EUT is positioned on cDASY6 platform, and is connected with the callbox (conducted for LTE and wirelessly for mmW). Keysight UXM callbox is set to request maximum mmW Tx power from EUT all the time. Hence, “path loss” calibration between callbox antenna and EUT is not needed in this test. The callbox’s LTE port is directly connected to the EUT’s RF port via a directional coupler to measure the EUT’s conducted Tx power using a Rohde & Schwarz NRP8S power sensor. Additionally, EUT is connected to the PC via USB connection for toggling between FTM and online mode with Smart Transmit enabled following the test procedures described Section 4.4.

Worst-surface of EUT (for the mmW beam being tested) is positioned facing up for PD measurement with cDASY6 mmW probe. Figure 5-2 shows the schematic of this measurement setup.

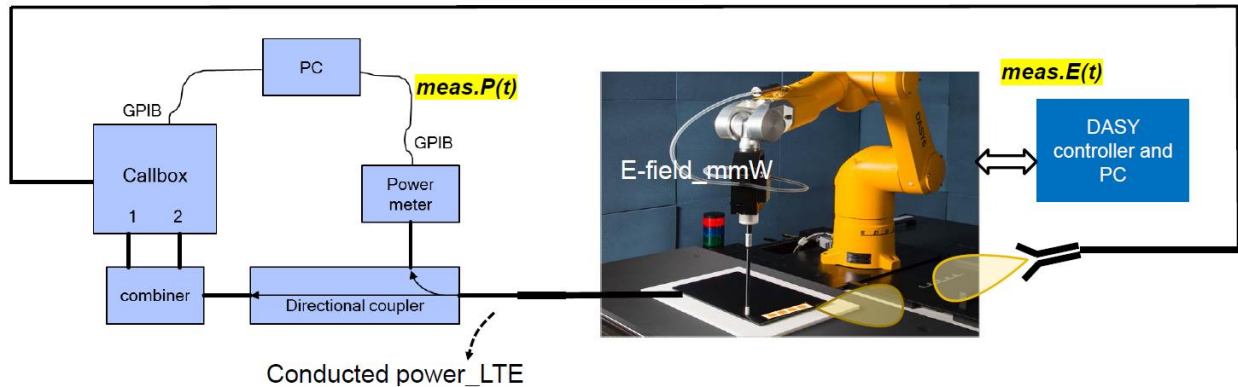


Figure 5-2
Power Density Measurement Setup – Test Setup Photo 2

Both callbox and power meters are connected to the PC using USB cables. Test scripts are custom made for automation of establishing LTE + mmW call, and for conducted Tx power recording of LTE transmission. These tests are manually stopped after desired time duration. Once the mmW link is established, LTE Tx power is programmed to toggle between all-up and all-down bits on the callbox. For all the tests, the callbox is set to request maximum Tx power in mmW NR radio from EUT all the time. Therefore, the calibration for the pathloss between the EUT and the horn antenna connected to the remote radio head of the callbox is not required.

Power meter readings are periodically recorded every 10ms on NR8S power sensor for LTE conducted Tx power. Time-averaged E-field measurements are performed using EUmmWV4 mmW probe at peak location of fast area scan. The distance between EUmmWV4 mmW probe tip to EUT surface is ~0.5 mm, and the distance between EUmmWV4 mmW probe sensor to probe tip is 1.5 mm. cDASY6 records relative point E-field (i.e., ratio $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$) versus time for mmW NR transmission.

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6.1 LTE + mmW NR transmission

Based on the selection criteria described in Section 4.2, the selections for LTE and mmW NR validation test are listed in Table 6-1. The radio configurations used in this test are listed in Table 6-2.

Table 6-1
Selections for LTE + mmW NR validation measurements

Transmission Scenario	Test	Technology and Band	mmWave Beam
Time-varying Tx power test	1. Cond. & Rad. Power meas. 2. PD meas.	LTE Band 2 and n261	Beam ID 31
		LTE Band 2 and n260	Beam ID 32
Switch in SAR vs. PD	1. Cond. & Rad. Power meas.	LTE Band 2 and n261	Beam ID 31
		LTE Band 2 and n260	Beam ID 32
Beam switch test	1. Cond. & Rad. Power meas.	LTE Band 2 and n261	Beam ID 31 to Beam ID 2
		LTE Band 2 and n260	Beam ID 32 to Beam ID 2

Table 6-2
Test configuration for LTE + mmW NR validation

Tech	Band	Antenna	DSI	Channel	Freq (MHz)	RB/RB Offset/Bandwidth (MHz)	Mode	UL Duty Cycle
LTE	2	3	255	18900	1880	1/0/20 MHz BW	QPSK	100%
mmW NR	n261	QTM1	-	2077915	27924.96	20/22/100 MHz BW	DFT-s-OFDM, QPSK	75.6%*
	n260	QTM1	-	2254165	38499.96	20/22/100 MHz BW	DFT-s-OFDM, QPSK	75.6%*

6.2 mmW NR radiated power test results

To demonstrate the compliance, the conducted Tx power of LTE Band 2 in DSI = 255 is converted to 1gSAR exposure by applying the corresponding worst-case 1g SAR value at P_{limit} as reported in Part 1 report and listed in Table 6-2 of this report.

Similarly, following Step 4 in Section 4.3.1, radiated Tx power of mmW Band n261 and n260 for the beams tested is converted by applying the corresponding measured worst-case 4cm²PD values, and listed in below Table 6-3. Qualcomm Smart Transmit feature operates based on time-averaged Tx power reported on a per symbol basis, which is independent of modulation, channel, and bandwidth (RBs), therefore the worst-case 4cm²PD was conducted with the EUT in FTM mode, with CW modulation and 100% duty cycle. cDASY6 system verification for power density measurement is provided in Section 8, and the associated SPEAG certificates are attached in Appendix C.

Both the worst-case 1gSAR and 4cm²PD values used in this section are listed in Table 6-3. The measured EIRP at *input.power.limit* for the beams tested in this section are also listed in Table 6-3.

Note: For evaluation of LTE+Sub6 NR transmission, please refer to Sub6 part2 report.

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Table 6-3
Worst-case 1gSAR, 4cm² avg. PD and EIRP measured at *input.power.limit* for the selected configurations

Tech	Band	Antenna	Beam ID	input.power.limit (dBm)	Measured psPD at input.power.limit		Measured EIRP at input.power.limit (dBm)
					4cm ² psPD (W/m ²)	Test Position	
mmW NR	n261	QTM1	31	2.3	4.04	Right Edge	16.99
		QTM1	2	8.0	3.78	Right Edge	13.72
mmW NR	n260	QTM1	32	2.3	3.19	Right Edge	16.53
		QTM1	2	7.3	5.16	Right Edge	12.19

Tech	Band	Antenna	DSI	Measured Plimit (dBm)	Measured 1g SAR at Plimit	
					1g SAR (W/kg)	Test Position
LTE	2	3	255	21.12	0.267	Right, Tilt

The 4cm² psPD distributions for the highest PD value per band, as listed in Table 6-3, are plotted below.




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Figure 6-1
4cm² psPD distribution measured at *input.power.limit* of 2.3 dBm on the right edge for n261 beam 31

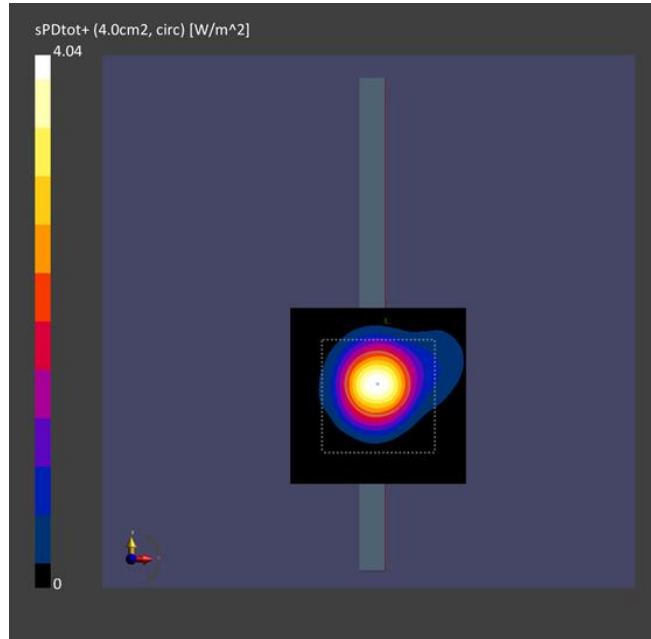
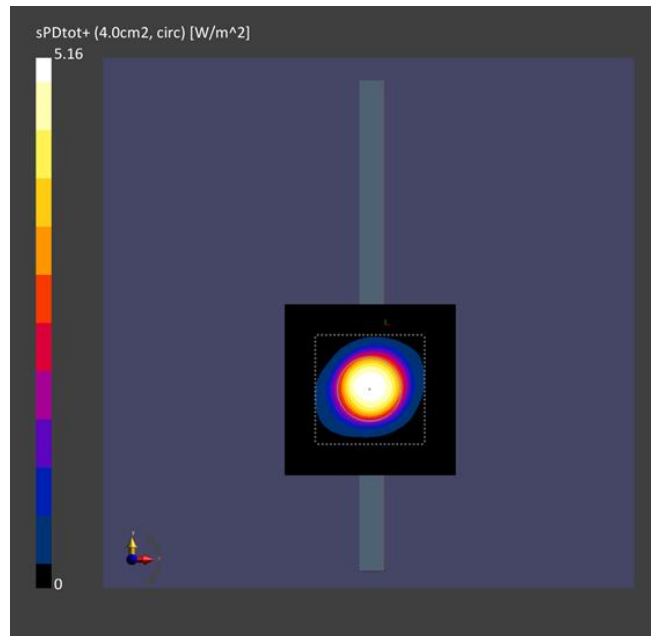




Figure 6-2
4cm² psPD distribution measured at *input.power.limit* of 7.3 dBm on the right edge for n260 beam 2



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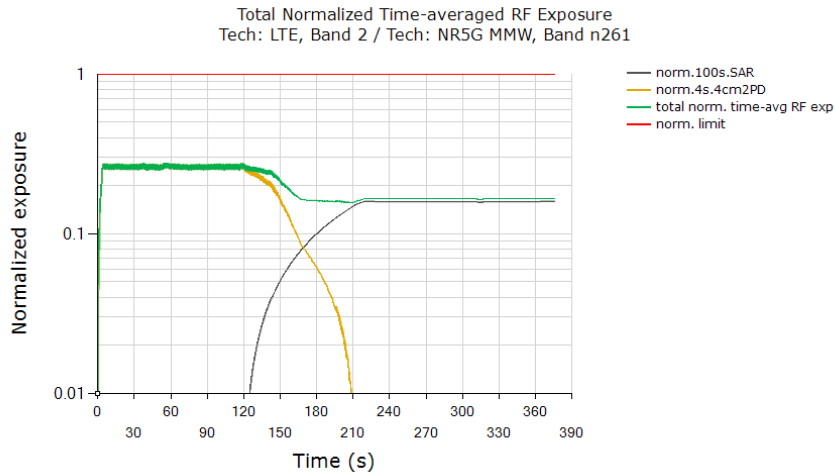
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RADIATED POWER TX CASES (FREQ > 6 GHZ)

7.1 Maximum Tx power test results for n261

This test was measured with LTE Band 2 and mmW Band n261 Beam ID 31, by following the detailed test procedure described in Section 4.3.1.

Time-averaged conducted Tx power for LTE Band 2 and radiated Tx power for mmW NR n261 beam 31 are converted into time-averaged 1gSAR and time-averaged 4cm²PD using Equation (1a) and (1b), which are divided by FCC 1gSAR limit of 1.6 W/kg and 4cm²PD limit of 10 W/m², respectively, to obtain normalized exposures versus time. Below plot shows (a) normalized time-averaged 1gSAR versus time, (b) normalized time-averaged 4cm²-avg.PD versus time, (c) sum of normalized time-averaged 1gSAR and normalized time-averaged 4cm²-avg.PD:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.279
Validated	

Plot notes: As soon as 5G mmW NR call was established, LTE was placed in all-down bits immediately. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW (based on the 3dB reserve setting in Part 1 report). At ~120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually and towards the end of the test, LTE is the dominant contributor towards RF exposure. Table 7-1 shows the calculations for the normalized 4cm² PD exposure values and the normalized 1g SAR exposure value.

Table 7-1

	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncertainty [dB]
0s~120s: NR Green/Orange Curve	4.04	40.4%	2.1
After ~120s: LTE Black Curve	0.267	16.7%	1

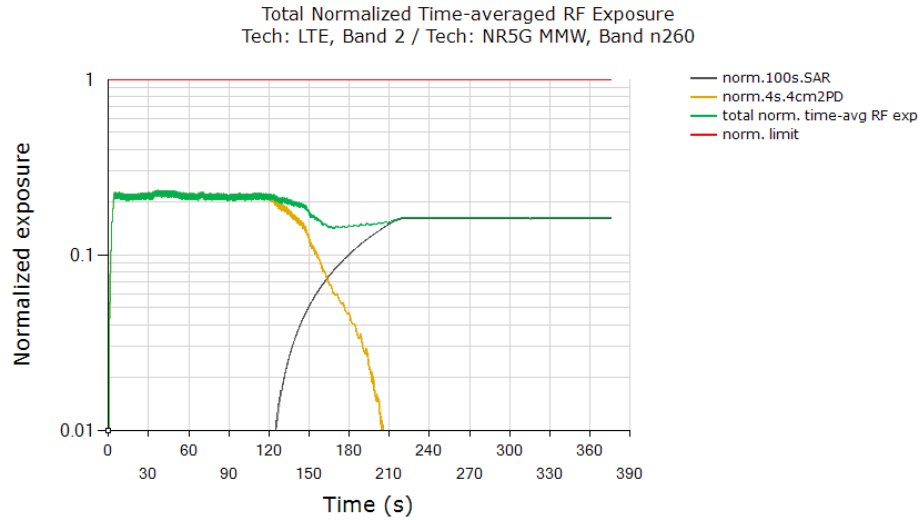
As can be seen, the power limiting enforcement is effective and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm® Smart Transmit time averaging feature is validated.

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7.2 Maximum Tx power test results for n260

This test was measured with LTE Band 2 and mmW Band n260 Beam ID 32, by following the detailed test procedure described in Section 4.3.1.

Time-averaged conducted Tx power for LTE Band 2 and radiated Tx power for mmW NR n260 beam 32 are converted into time-averaged 1gSAR and time-averaged 4cm²PD using Equation (1a) and (1b), which are divided by FCC 1gSAR limit of 1.6 W/kg and 4cm²PD limit of 10 W/m², respectively, to obtain normalized exposures versus time. Below plot shows (a) normalized time-averaged 1gSAR versus time, (b) normalized time-averaged 4cm²-avg.PD versus time, (c) sum of normalized time-averaged 1gSAR and normalized time-averaged 4cm²-avg.PD:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.235
Validated	

Plot notes: As soon as 5G mmW NR call was established, LTE was placed in all-down bits immediately. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW (based on the 3dB reserve setting in Part 1 report). At ~120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually and towards the end of the test, LTE is the dominant contributor towards RF exposure. Table 7-2 shows the calculations for the normalized 4cm² PD exposure values and the normalized 1g SAR exposure value.

Table 7-2

	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncertainty [dB]
0s~120s: NR Green/Orange Curve	3.19	31.9%	2.1
After ~120s: LTE Black Curve	0.267	16.7%	1

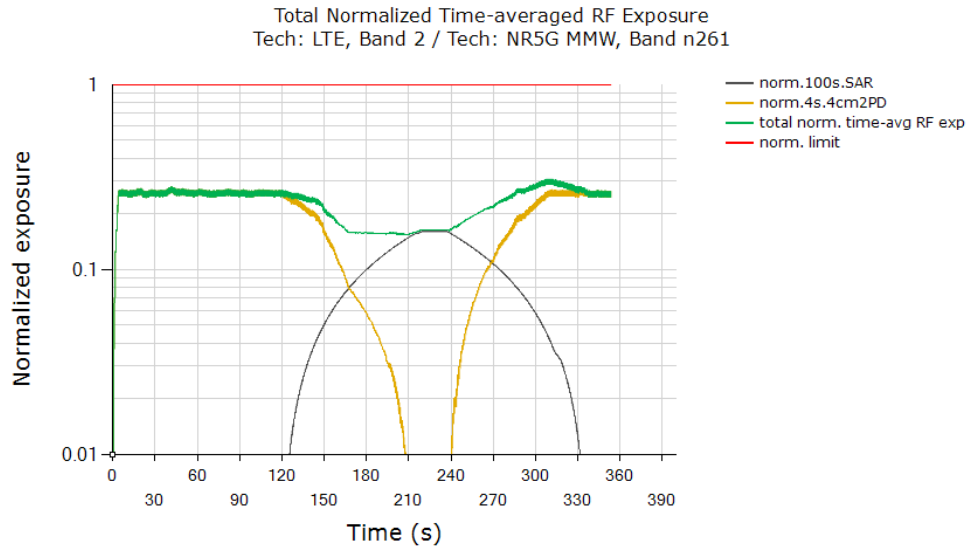
As can be seen, the power limiting enforcement is effective and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm® Smart Transmit time averaging feature is validated.

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7.3 Switch in SAR vs. PD exposure test results for n261

This test was measured with LTE Band 2 (DSI = 255) and mmW Band n261 Beam ID 31, by following the detailed test procedure described in Section 4.3.2.

Normalized time-averaged exposures for LTE (1gSAR) and mmW (4cm²PD), as well as total normalized time-averaged exposure versus time:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.309
Validated	

Plot notes: As soon as 5G mmW NR call was established, LTE was placed in all-down bits immediately. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW. At ~120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually (orange curve for mmW exposure goes down while black curve for LTE exposure goes up). At ~235s time mark, LTE is set to all-down bits, which results in mmW getting back RF margin slowly as seen by gradual increase in mmW exposure (orange curve for mmW exposure goes up while black curve for LTE exposure goes down). Table 7-3 shows the calculations for the normalized 4cm² PD exposure value and the normalized 1g SAR exposure value.

Table 7-3

	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncert [dB]
0s~120s + After 240s: NR Green/Orange Curve	4.04	40.4%	2.1
120s - 240s: LTE Black Curve	0.267	16.7%	1

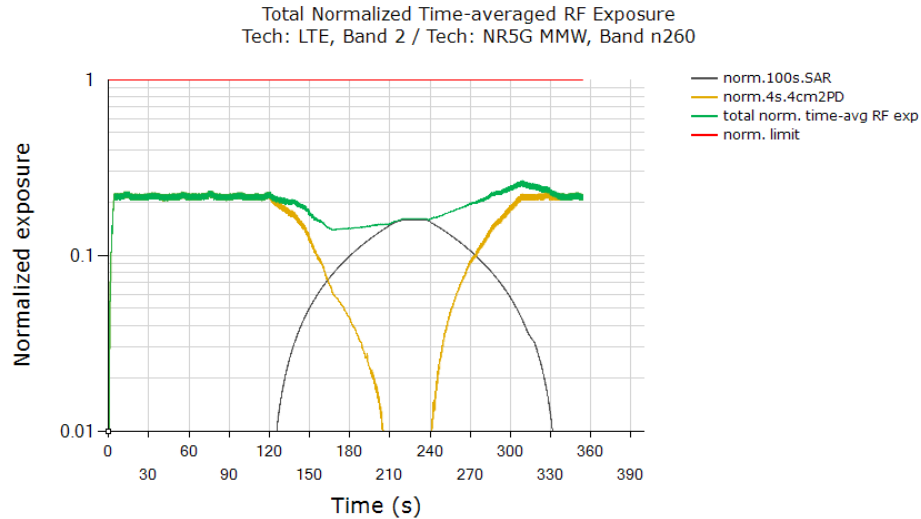
As can be seen, the power limiting enforcement is effective during transmission when SAR and PD exposures are switched, and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm® Smart Transmit time averaging feature is validated.

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7.4 Switch in SAR vs. PD exposure test results for n260

This test was measured with LTE Band 2 (DSI =255) and mmW Band n260 Beam ID 32, by following the detailed test procedure is described in Section 4.3.2.

Normalized time-averaged exposures for LTE (1gSAR) and mmW (4cm²PD), as well as total normalized time-averaged exposure versus time:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.267
Validated	

Plot notes: As soon as 5G mmW NR call was established, LTE was placed in all-down bits immediately. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW). At ~120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually (orange curve for mmW exposure goes down while black curve for LTE exposure goes up). At ~235s time mark, LTE is set to all-down bits, which results in mmW getting back RF margin slowly as seen by gradual increase in mmW exposure (orange curve for mmW exposure goes up while black curve for LTE exposure goes down). Table 7-4 shows the calculations for the normalized 4cm² PD exposure value and the normalized 1g SAR exposure value.

Table 7-4

	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncert [dB]
0s~120s + After 240s: NR Green/Orange Curve	3.19	31.9%	2.1
120s - 240s: LTE Black Curve	0.267	16.7%	1

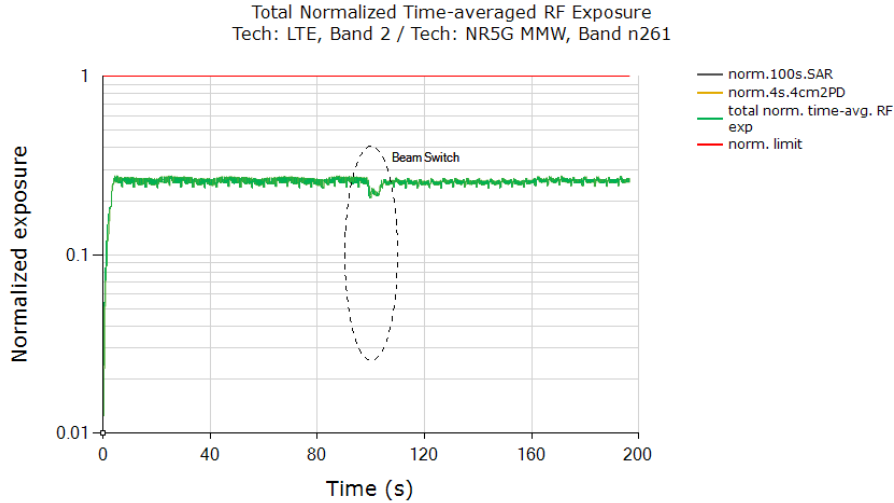
As can be seen, the power limiting enforcement is effective during transmission when SAR and PD exposures are switched, and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm[®] Smart Transmit time averaging feature is validated.

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7.5 Change in Beam test results for n261

This test was measured with LTE Band 2 (DSI = 255) and mmW Band n261, with beam switch from Beam ID 31 to Beam ID 2, by following the test procedure is described in Section 4.3.3.

Normalized time-averaged exposures for LTE and mmW (4cm²PD), as well as total normalized time-averaged exposure versus time:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.277
Validated	

Plot notes: 5G mmW NR call was established at ~1s time mark and LTE was placed in all-down bits immediately after 5G mmW NR call was established. For the rest of this test, mmW exposure is the dominant contributor as LTE is left in all-down bits. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW for the first beam (based on 3dB reserve setting in Part 1 report). At ~100s time mark (shown in black dotted ellipse), beam switch takes place and mmW starts transmission from the second beam. Second beam transmits at *input.power.limit* with active power limiting. During the switch, the ratio between the averaged radiated powers of the two beams (yellow curve) should correspond to the difference in EIRPs measured at each corresponding *input.power.limit* for these beams listed in Table 7-5. Table 7-5 shows the calculations for the normalized 4cm² PD exposure values and the difference in EIRPs between two beams.

Table 7-5

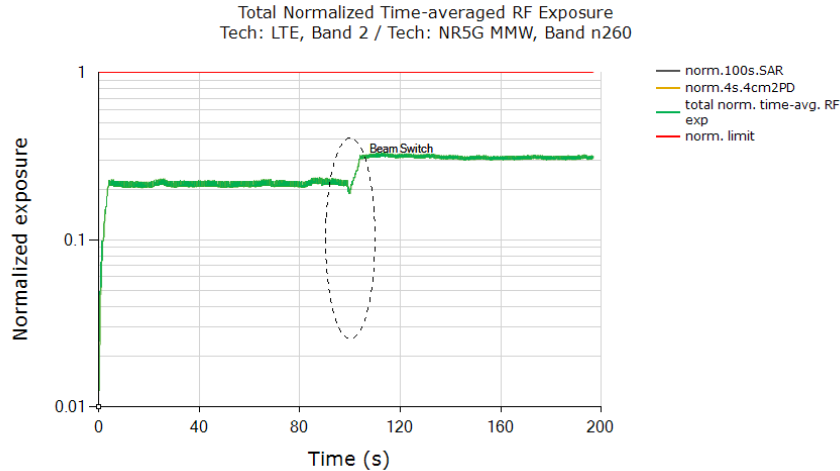
	Beam ID 31 (0 - 100 sec, before ellipse)	Beam ID 2 (100 - 200 sec, after ellipse)
Static psPD [W/m ²]	4.04	3.78
Input.power.limit [dBm]	2.3	8.0
Maximum Power [dBm]	12.0	
Normalized 4cm ² PD exposure value [% ± 2.1 dB uncertainty]	40.4%	37.8%
EIRP Difference [dB ± 2.1 dB uncertainty]	3.3 dB	

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7.6 Change in Beam test results for n260

This test was measured with LTE Band 2 (DSI = 255) and mmW Band n260, with beam switch from Beam ID 32 to Beam ID 2, by following the test procedure is described in Section 4.3.3.

Normalized time-averaged exposures for LTE and mmW (4cm²PD), as well as total normalized time-averaged exposure versus time:



FCC requirement for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.330
Validated	

Plot notes: 5G mmW NR call was established at ~1s time mark and LTE was placed in all-down bits immediately after 5G mmW NR call was established. For the rest of this test, mmW exposure is the dominant contributor as LTE is left in all-down bits. Here, Smart Transmit feature allocates a maximum of 1.0 for mmW for the first beam (based on 3dB reserve setting in Part 1 report). At ~100s time mark (shown in black dotted ellipse), beam switch takes place and mmW starts transmission from the second beam. Second beam transmits at *input.power.limit* with active power limiting. During the switch, the ratio between the averaged radiated powers of the two beams (yellow curve) should correspond to the difference in EIRPs measured at each corresponding *input.power.limit* for these beams listed in Table 7-6. Table 7-6 shows the calculations for the normalized 4cm² PD exposure values and the difference in EIRPs between two beams.

Table 7-6

	Beam ID 32 (0 - 100 sec, before ellipse)	Beam ID 2 (100 - 200 sec, after ellipse)
Static psPD [W/m ²]	3.19	5.16
Input.power.limit [dBm]	2.3	7.3
Maximum Power [dBm]	11.0	
Normalized 4cm ² PD exposure value [% ± 2.1 dB uncertainty]	31.9%	51.6%
EIRP Difference [dB ± 2.1 dB uncertainty]	4.3 dB	

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8 SYSTEM VERIFICATION (FREQ > 6 GHZ)

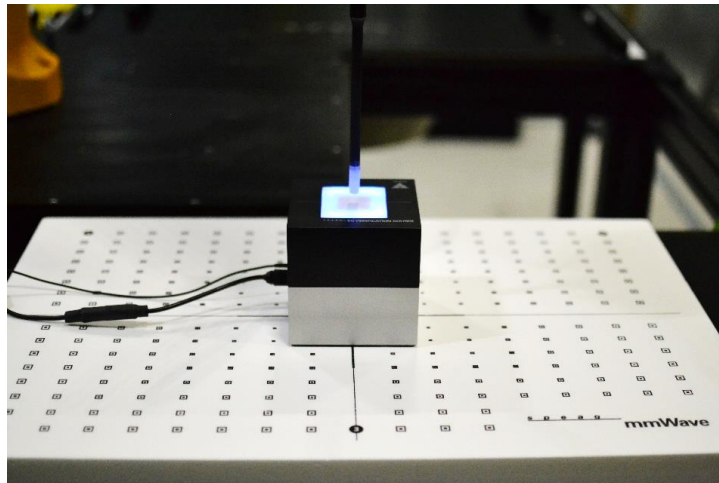
The system was verified to be within ± 0.66 dB of the power density targets on the calibration certificate according to the test system specification in the user's manual and calibration facility recommendation. The 0.66 dB deviation threshold represents the expanded uncertainty for system performance checks using SPEAG's mmWave verification sources. The same spatial resolution and measurement region used in the source calibration was applied during the system check.

The measured power density distribution of verification source was also confirmed through visual inspection to have no noticeable differences, both spatially (shape) and numerically (level) from the distribution provided by the manufacturer, per November 2017 TCBC Workshop Notes.

**Table 8-1
System Verification Results**

System Verification										
Syst.	Freq. (GHz)	Date	Source SN	Probe SN	Normal psPD (W/m ² over 4 cm ²)		Deviation (dB)	Total psPD (W/m ² over 4 cm ²)		Deviation (dB)
					measured	target		measured	target	
N	30.00	11/22/2021	1045	9541	31.50	32.70	-0.16	32.00	33.20	-0.16
N	30.00	12/2/2021	1035	9541	28.60	31.00	-0.35	28.90	31.00	-0.30

Note: A **10 mm distance spacing** was used from the reference horn antenna aperture to the probe element. This includes 4.45 mm from the reference antenna horn aperture to the surface of the verification source plus 5.55 mm from the surface to the probe. The SPEAG software requires a setting of "5.55 mm" for the correct set up.



**Figure 8-1
System Verification Setup Photo**

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9.1 PD measurement results for maximum power transmission scenario

The following configurations were measured by following the detailed test procedure is described in Section 4.4:

1. LTE Band 2 (DSI = 255) and mmW Band n261 Beam ID 31
2. LTE Band 2 (DSI = 255) and mmW Band n260 Beam ID 32

The measured conducted Tx power of LTE and ratio of $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$ of mmW is converted into 10gSAR and 4cm²PD value, respectively, using Eq. (4a) and (4b), rewritten below:

$$1g_or_10gSAR(t) = \frac{conducted_Tx_power(t)}{conducted_Tx_power_P_{limit}} * 1g_or_10gSAR_P_{limit} \quad (4a)$$

$$4cm^2PD(t) = \frac{[pointE(t)]^2}{[pointE_input.power.limit]^2} * 4cm^2PD_input.power.limit \quad (4b)$$

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC\ SAR\ limit} + \frac{\frac{1}{T_{PD}} \int_{t-T_{PD}}^t 4cm^2PD(t) dt}{FCC\ 4cm^2PD\ limit} \leq 1 \quad (4c)$$

where, $conducted_Tx_power(t)$, $conducted_Tx_power_P_{limit}$, and $1g_or_10gSAR_P_{limit}$ correspond to the measured instantaneous conducted Tx power, measured conducted Tx power at P_{limit} , and measured 1gSAR or 10gSAR values at P_{limit} corresponding to LTE transmission. Similarly, $pointE(t)$, $pointE_input.power.limit$, and $4cm^2PD@input.power.limit$ correspond to the measured instantaneous E-field, E-field at $input.power.limit$, and 4cm²PD value at $input.power.limit$ corresponding to mmW transmission.

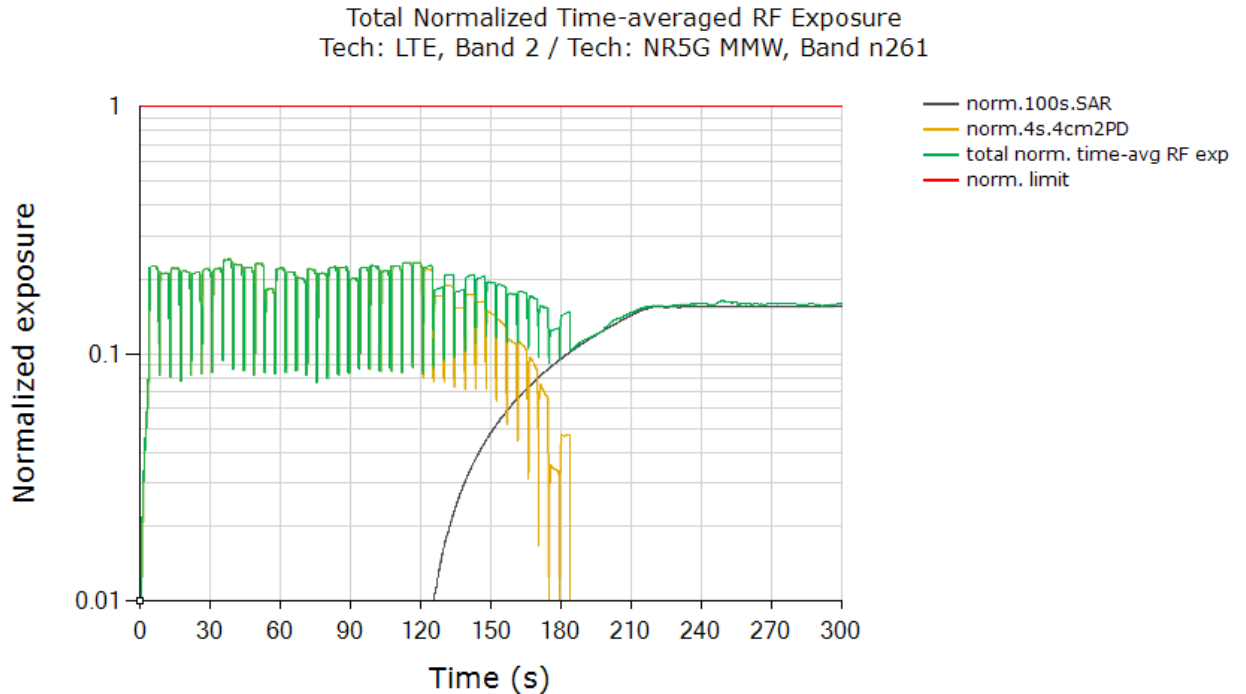
NOTE: cDASY6 system measures relative E-field, and provides ratio of $\frac{[pointE(t)]^2}{[pointE_input.power.limit]^2}$ versus time.

The radio configurations tested are described in Table 12-1 and Table 12-2. The 1gSAR at P_{limit} for LTE 2 DSI = 255, the measured 4cm²PD at $input.power.limit$ of mmW n261 beam 31 and n260 beam 32, are all listed in Table 6-3.

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9.1.1 PD test results for n261

Step 2.e plot (in Section 4.4) for normalized instantaneous and time-averaged exposures for LTE and mmW n261 beam 31.



FCC limit for total RF exposure (normalized)	1.0
Max total normalized time-averaged RF exposure (green curve)	0.242
Validated	

Plot notes: LTE was placed in all-down bits immediately after 5G mmW NR call was established. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 100% for mmW (based on the 3dB reserve setting in Part 1 report). Around the 120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually. Towards the end of the test, LTE is the dominant contributor towards RF exposure. Table 9-1 shows the calculations for the normalized 4cm² PD exposure values and the normalized 1g SAR exposure value.

Table 9-1

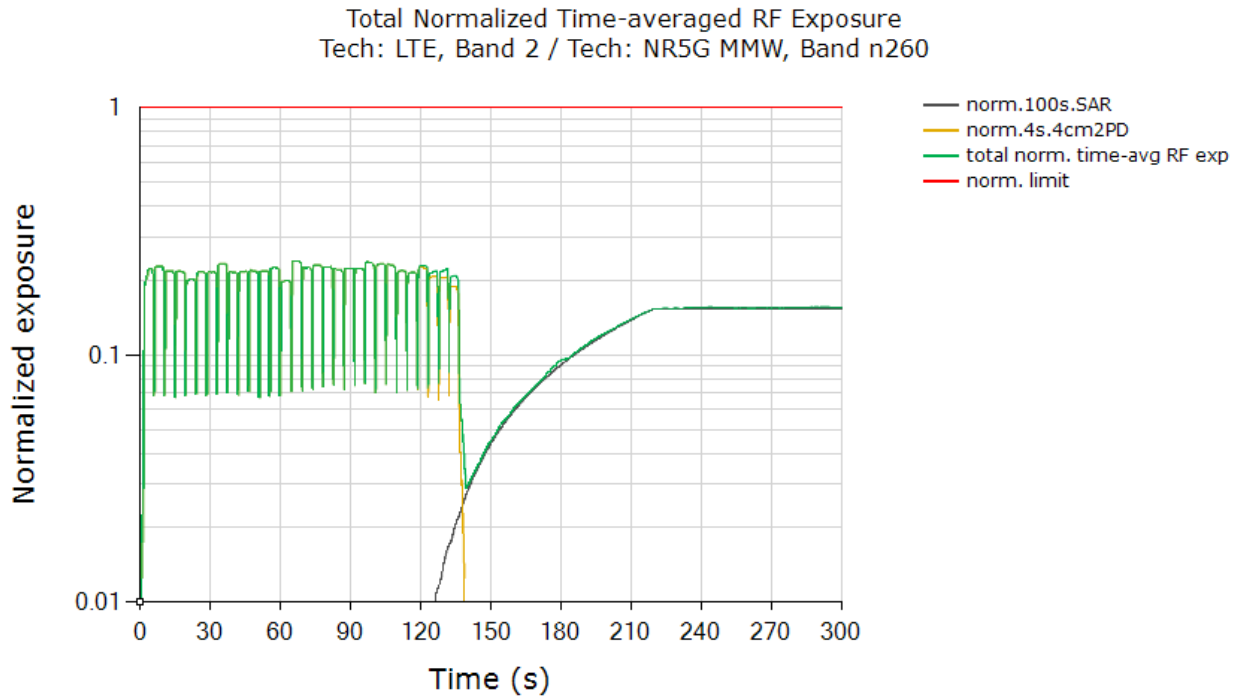
	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncertainty [dB]
0s~120s: NR Green/Orange Curve	4.04	40.4%	2.1
After ~120s: LTE Black Curve	0.267	16.7%	1

As can be seen, the power limiting enforcement is effective and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm® Smart Transmit time averaging feature is validated.

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9.1.2 PD test results for n260

Step 2.e plot (in Section 4.4) for normalized instantaneous and time-averaged exposures for LTE and mmW n260 beam 32.



FCC limit for total RF exposure	1.0
Max total normalized time-averaged RF exposure (green curve)	0.239
Validated	

Plot notes: LTE was placed in all-down bits immediately after 5G mmW NR call was established. Between 0s~120s, mmW exposure is the dominant contributor. Here, Smart Transmit feature allocates a maximum of 100% for mmW (based on the 3dB reserve setting in Part 1 report). Around the 120s time mark, LTE is set to all-up bits, taking away margin from mmW exposure gradually. Towards the end of the test, LTE is the dominant contributor towards RF exposure. Table 9-2 shows the calculations for the normalized 4cm² PD exposure values and the normalized 1g SAR exposure value.

Table 9-2

	Static 4cm ² PD or 1g SAR [W/m ² or W/kg]	Normalized Exposure	Uncertainty [dB]
0s~120s: NR Green/Orange Curve	3.19	31.9%	2.1
After ~120s: LTE Black Curve	0.267	16.7%	1

As can be seen, the power limiting enforcement is effective and the total normalized time-averaged RF exposure does not exceed 1.0. Therefore, Qualcomm® Smart Transmit time averaging feature is validated.

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10 EQUIPMENT LIST

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
Agilent	N9020A	MXA Signal Analyzer	2/24/2021	Annual	2/24/2022	MY48010233
Agilent	N5182A	MXG Vector Signal Generator	6/15/2021	Annual	6/15/2022	MY47420800
Agilent	8753ES	S-Parameter Network Analyzer	2/2/2021	Annual	2/2/2022	US39170122
Agilent	8753ES	S-Parameter Vector Network Analyzer	12/15/2020	Annual	12/15/2021	MY40003841
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433972
Amplifier Research	15S1G6	Amplifier	CBT	N/A	CBT	433974
COMTECH	AR85729-5/5759B	Solid State Amplifier	CBT	N/A	CBT	M3W1A00-1002
COMTECH	AR85729-5	Solid State Amplifier	CBT	N/A	CBT	M1S5A00-009
Control Company	4040	Therm./ Clock/ Humidity Monitor	3/6/2020	Biennial	3/6/2022	200170289
K & L	11SH10-1300/U4000	High Pass Filter	N/A	N/A	N/A	11SH10-1300/U4000 - 2
Keysight Technologies	772D	Dual Directional Coupler	CBT	N/A	CBT	MY52180215
Keysight Technologies	E7515B	UXM 5G Wireless Test Platform	N/A	N/A	N/A	MY59150289
Keysight Technologies	M1740A	mmWave Transceiver	2/20/2020	Biennial	2/20/2022	MY59291989
Keysight Technologies	M1740A	mmWave Transceiver	2/20/2020	Biennial	2/20/2022	MY59291982
Keysight Technologies	E7770A	Common Interface Unit	N/A	N/A	N/A	MY58290483
Krytar	110067006	Directional Coupler, 10 - 67 GHz	N/A	N/A	N/A	200391
MCL	BW-N6W5+	6dB Attenuator	CBT	N/A	CBT	1139
Mini Circuits	ZA2PD2-63-S+	Power Splitter	CBT	N/A	CBT	SUU64901930
Mini Circuits	ZAPD-2-272-S+	Power Splitter	CBT	N/A	CBT	SF702001405
Mini-Circuits	BW-N20W5+	DC to 18 GHz Precision Fixed 20 dB Attenuator	CBT	N/A	CBT	N/A
Mini-Circuits	BW-N20W5	Power Attenuator	CBT	N/A	CBT	1226
Narda	4216-10	Directional Coupler, 0.5 to 8.0 GHz, 10 dB	CBT	N/A	CBT	01492
Narda	4216-10	Directional Coupler, 0.5 to 8.0 GHz, 10 dB	CBT	N/A	CBT	01493
Narda	4772-3	Attenuator	CBT	N/A	CBT	9406
Narda	BW-53W2	Attenuator	CBT	N/A	CBT	120
Narda	BW-510W2+	Attenuator	CBT	N/A	CBT	831
Pasternack	PE2208-6	Bidirectional Coupler	CBT	N/A	CBT	N/A
Pasternack	PE2209-10	Bidirectional Coupler	CBT	N/A	CBT	N/A
Rohde & Schwarz	NRP85	3 Path Dipole Power Sensor	3/24/2021	Annual	3/24/2022	108168
Rohde & Schwarz	NRP85	3-Path Dipole Power Sensor	5/13/2021	Annual	5/13/2022	109322
Rohde & Schwarz	NRP85	3-Path Dipole Power Sensor	5/13/2021	Annual	5/13/2022	109052
Rohde & Schwarz	NRP50S	3-Path Dipole Power Sensor	3/24/2021	Annual	3/24/2022	101164
SPEAG	5G Verification Source 30GHz	30GHz System Verification Antenna	2/10/2021	Annual	2/10/2022	1035
SPEAG	5G Verification Source 30GHz	30GHz System Verification Antenna	12/10/2020	Annual	12/10/2021	1045
SPEAG	EUmmWV4	E-field Probe	5/20/2021	Annual	5/20/2022	9541
SPEAG	DAE4	Dasy Data Acquisition Electronics	2/12/2021	Annual	2/12/2022	665
Zhuai Bojay Electronics	BJ8827	Shielded Test Enclosure	N/A	N/A	N/A	F229647

Notes:



1. CBT (Calibrated Before Testing). Prior to testing, the measurement paths containing a cable, amplifier, attenuator, coupler, or filter were connected to a calibrated source (i.e. a signal generator) to determine the losses of the measurement path. The power meter offset was then adjusted to compensate for the measurement system losses. This level offset is stored within the power meter before measurements are made. This calibration verification procedure applies to the system verification and output power measurements. The calibrated reading is then taken directly from the power meter after compensation of the losses for all final power measurements.
2. Each equipment item is used solely within its respective calibration period.

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11 MEASUREMENT UNCERTAINTIES

For PD Measurements

a	b	c	d	e	f =	g
Uncertainty Component	Unc. (± dB)	Prob. Dist.	Div.	c _i	c × f/e u (± dB)	v _i
Measurement System						
Calibration	0.49	N	1	1	0.49	∞
Probe Correction	0.00	R	1.73	1	0.00	∞
Frequency Response	0.20	R	1.73	1	0.12	∞
Sensor Cross Coupling	0.00	R	1.73	1	0.00	∞
Isotropy	0.50	R	1.73	1	0.29	∞
Linearity	0.20	R	1.73	1	0.12	∞
Probe Scattering	0.00	R	1.73	1	0.00	∞
Probe Positioning offset	0.30	R	1.73	1	0.17	∞
Probe Positioning Repeatability	0.04	R	1.73	1	0.02	∞
Sensor Mechanical Offset	0.00	R	1.73	1	0.00	∞
Probe Spatial Resolution	0.00	R	1.73	1	0.00	∞
Field Impedance Dependence	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Drift	0.00	R	1.73	1	0.00	∞
Amplitude and Phase Noise	0.04	R	1.73	1	0.02	∞
Measurement Area Truncation	0.00	R	1.73	1	0.00	∞
Data Acquisition	0.03	N	1	1	0.03	∞
Sampling	0.00	R	1.73	1	0.00	∞
Field Reconstruction	0.60	R	1.73	1	0.35	∞
Forward Transformation	0.00	R	1.73	1	0.00	∞
Power Density Scaling	0.00	R	1.73	1	0.00	∞
Spatial Averaging	0.10	R	1.73	1	0.06	∞
System Detection Limit	0.04	R	1.73	1	0.02	∞
Test Sample Related						
Probe Coupling with DUT	0.00	R	1.73	1	0.00	∞
Modulation Response	0.40	R	1.73	1	0.23	∞
Integration Time	0.00	R	1.73	1	0.00	∞
Response Time	0.00	R	1.73	1	0.00	∞
Device Holder Influence	0.10	R	1.73	1	0.06	∞
DUT alignment	0.00	R	1.73	1	0.00	∞
RF Ambient Conditions	0.04	R	1.73	1	0.02	∞
Ambient Reflections	0.04	R	1.73	1	0.02	∞
Immunity/Secondary Reception	0.00	R	1.73	1	0.00	∞
Drift of DUT	0.21	R	1.73	1	0.12	∞
Combined Standard Uncertainty (k=1)		RSS			0.76	∞
Expanded Uncertainty (95% CONFIDENCE LEVEL)		k=2			1.52	

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12 CONCLUSION

12.1 Measurement Conclusion

The SAR evaluation indicates that the DUT complies with the RF radiation exposure limits of the FCC and Innovation, Science, and Economic Development Canada, with respect to all parameters subject to this test. These measurements were taken to simulate the RF effects of RF exposure under worst-case conditions. Precise laboratory measures were taken to assure repeatability of the tests. The results and statements relate only to the item(s) tested.

Please note that the absorption and distribution of electromagnetic energy in the body are very complex phenomena that depend on the mass, shape, and size of the body, the orientation of the body with respect to the field vectors, and the electrical properties of both the body and the environment. Other variables that may play a substantial role in possible biological effects are those that characterize the environment (e.g. ambient temperature, air velocity, relative humidity, and body insulation) and those that characterize the individual (e.g. age, gender, activity level, debilitation, or disease). Because various factors may interact with one another to vary the specific biological outcome of an exposure to electromagnetic fields, any protection guide should consider maximal amplification of biological effects as a result of field-body interactions, environmental conditions, and physiological variables. [3]

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