



Part 2: Test Under Dynamic Transmission Condition

For
SMARTPHONE

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1 Introduction

The equipment under test (EUT) is A2403, A2404, and A2405 (FCC ID: BCG-E3544A), it contains the Qualcomm modems supporting 2G/3G/4G technologies and mmW 5G NR bands. Both of these modems are enabled with Qualcomm Smart Transmit feature to control and manage transmitting power in real time and to ensure at all times the time-averaged RF exposure is in compliance with the FCC requirement.

This purpose of the Part 2 report is to demonstrate the EUT complies with FCC RF exposure requirement under Tx varying transmission scenarios, thereby validity of Qualcomm Smart Transmit feature for FCC equipment authorization of Model A2403, A2404, A2405. This EUT does not support mmW 5G WWAN therefore disregard all references to mmW PD.

The P_{limit} and *input.power.limit* used in this report is determined in Part 0 and Part 1 reports.

Refer to Compliance summary report for product description and terminology used in this report.

2 Tx Varying Transmission Test Cases and Test Proposal

To validate time averaging feature and demonstrate the compliance in Tx varying transmission conditions, the following transmission scenarios are covered in 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 a call disconnect and re-establish scenario: To prove that the Smart Transmit feature accounts for history of past Tx power transmissions accurately.
3. During technology/band handover: To prove that the Smart Transmit feature functions correctly during transitions in technology/band.
4. During DSI (Device State Index) change: To prove that the Smart Transmit feature functions correctly during transition from one device state (DSI) to another.
5. During 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).
6. 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.
7. During time window switch: To prove that the Smart Transmit feature correctly handles the transition from one time window to another specified by FCC, and maintains the normalized time-averaged RF exposure to be less than normalized FCC limit of 1.0 at all times.
8. SAR exposure switching between two active radios (radio1 and radio2): To prove that the Smart Transmit feature functions correctly and ensures total RF exposure compliance when exposure varies among SAR_radio1 only, SAR_radio1 + SAR_radio2, and SAR_radio2 only 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 8.

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 (such as, for scenario 3 requiring change in SAR probe calibration file to accommodate different bands and/or tissue simulating liquid).

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 transmission only:

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

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC \ SAR \ limit} \leq 1 \quad (1b)$$

- For sub-6+mmW transmission:

$$1g_or_10gSAR(t) = \frac{conducted_Tx_power(t)}{conducted_Tx_power_P_{limit}} * 1g_or_10gSAR_P_{limit} \quad (2a)$$

$$4cm^2PD(t) = \frac{radiated_Tx_power(t)}{radiated_Tx_power_input_power_limit} * 4cm^2PD_input_power_limit \quad (2b)$$

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

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 sub-6 transmission. Similarly, $radiated_Tx_power(t)$, $radiated_Tx_power_input_power_limit$, and $4cm^2PD_input_power_limit$ correspond to the measured instantaneous radiated Tx power, radiated Tx power at $input_power_limit$ (i.e., radiated power limit), and $4cm^2PD$ value at $input_power_limit$ corresponding to mmW transmission. Both P_{limit} 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 sub-6 transmission only:

$$1g_or_10gSAR(t) = \frac{pointSAR(t)}{pointSAR_P_{limit}} * 1g_or_10gSAR(t)_P_{limit} \quad (3a)$$

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC \ SAR \ limit} \leq 1 \quad (3b)$$

- For LTE+mmW transmission:

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

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

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

where, $pointSAR(t)$, $pointSAR_P_{limit}$, and $1g_or_10gSAR_P_{limit}$ correspond to the measured instantaneous point SAR, measured point SAR at P_{limit} , and measured 1gSAR or 10gSAR values at P_{limit} corresponding to sub-6 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 $4cm^2PD$ value at $input.power.limit$ corresponding to mmW transmission.

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.

3 SAR Time Averaging Validation Test Procedures

This chapter provides the test plan and test procedure for validating Qualcomm Smart Transmit feature for sub-6 transmission. The 100 seconds time window for operating $f < 3\text{GHz}$ is used as an example to detail the test procedures in this chapter. The same test plan and test procedures described in this chapter apply to 60 seconds time window for operating $f \geq 3\text{GHz}$.

3.1 Test sequence determination for validation

Following the FCC recommendation, two test sequences having time-variation in Tx power are predefined for sub-6 ($f < 6\text{GHz}$) validation:

- Test sequence 1: request EUT's Tx power to be at maximum power, measured P_{max}^\dagger , for 80s, then requesting for half of the maximum power, i.e., measured $P_{max}/2$, for the rest of the time.
- Test sequence 2: request EUT's Tx power to vary with time. This sequence is generated relative to measured P_{max} , measured P_{limit} and calculated $P_{reserve}$ (= measured P_{limit} in dBm - *Reserve_power_margin* in dB) of EUT based on measured P_{limit} .

The details for generating these two test sequences is described and listed in Appendix A.

Note: For test sequence generation, "measured P_{limit} " and "measured P_{max} " are used instead of the " P_{limit} " specified in EFS entry and " P_{max} " specified for the device, because Smart Transmit feature operates against the actual power level of the " P_{limit} " that was calibrated for the EUT. The "measured P_{limit} " accurately reflects what the feature is referencing to, therefore, it should be used during feature validation testing. The RF tune up and device-to-device variation are already considered in Part 0 report prior to determining P_{limit} .

3.2 Test configuration selection criteria for validating Smart Transmit feature

For validating Smart Transmit feature, this section provides a general guidance to select test cases. In practice, an adjustment can be made in test case selection. The justification/clarification may be provided.

3.2.1 Test configuration selection for time-varying Tx power transmission

The Smart Transmit time averaging feature operation is independent of bands, modes, and channels for a given technology. Hence, validation of Smart Transmit in one band/mode/channel per technology is sufficient. Two bands per technology are proposed and selected for this testing to provide high confidence in this validation.

The criteria for the selection are based on the P_{limit} values determined in Part 0 report. Select two bands* in each supported technology that correspond to least** and highest*** P_{limit} values that are less than P_{max} for validating Smart Transmit.

- * If one P_{limit} level applies to all the bands within a technology, then only one band needs to be tested. In this case, within the bands having the same P_{limit} , the radio configuration (e.g., # of RBs, channel#) and device position that correspond to the highest *measured* 1gSAR at P_{limit} shown in Part 1 report is selected.
- ** In case of multiple bands having the same least P_{limit} within the technology, then select the band having the highest *measured* 1gSAR at P_{limit} .

- *** The band having a higher P_{limit} needs to be properly selected so that the power limiting enforced by Smart Transmit can be validated using the pre-defined test sequences. If the highest P_{limit} in a technology is too high where the power limiting enforcement is not needed when testing with the pre-defined test sequences, then the next highest level is checked. This process is continued within the technology until the second band for validation testing is determined.

3.2.2 Test configuration selection for change in call

The criteria to select a test configuration for call-drop measurement is:

- Select technology/band with least P_{limit} among all supported technologies/bands, and select the radio configuration (e.g., # of RBs, channel#) in this technology/band that corresponds to the highest *measured* 1gSAR at P_{limit} listed in Part 1 report.
- In case of multiple bands having same least P_{limit} , then select the band having the highest *measured* 1gSAR at P_{limit} in Part 1 report.

This test is performed with the EUT's Tx power requested to be at maximum power, the above band selection will result in Tx power enforcement (i.e., EUT forced to have Tx power at $P_{reserve}$) for longest duration in one FCC defined time window. The call change (call drop/reestablish) is performed during the Tx power enforcement duration (i.e., during the time when EUT is forced to have Tx power at $P_{reserve}$). One test is sufficient as the feature operation is independent of technology and band.

3.2.3 Test configuration selection for change in technology/band

The selection criteria for this measurement is, for a given antenna, to have EUT switch from a technology/band with lowest P_{limit} within the technology group (in case of multiple bands having the same P_{limit} , then select the band with highest *measured* 1gSAR at P_{limit}) to a technology/band with highest P_{limit} within the technology group, in case of multiple bands having the same P_{limit} , then select the band with lowest *measured* 1gSAR at P_{limit} in Part 1 report, or vice versa.

This test is performed with the EUT's Tx power requested to be at maximum power, the technology/band switch is performed during Tx power enforcement duration (i.e., during the time when EUT is forced to have Tx power at $P_{reserve}$).

3.2.4 Test configuration selection for change in antenna

The criteria to select a test configuration for antenna switch measurement is:

- Whenever possible and supported by the EUT, first select antenna switch configuration within the same technology/band (i.e., same technology and band combination).
- Then, select any technology/band that supports multiple Tx antennas, and has the highest difference in P_{limit} among all supported antennas.
- In case of multiple bands having same difference in P_{limit} among supported antennas, then select the band having the highest *measured* 1gSAR at P_{limit} in Part 1 report.

This test is performed with the EUT's Tx power requested to be at maximum power in selected technology/band, and antenna change is conducted during Tx power enforcement duration (i.e., during the time when EUT is forced to have Tx power at $P_{reserve}$).

3.2.5 Test configuration selection for change in DSI

The criteria to select a test configuration for DSI change test is:

- Select a technology/band having the $P_{limit} < P_{max}$ within any technology and DSI group, and for the same technology/band having a different P_{limit} in any other DSI group. Note that the selected DSI transition need to be supported by the device.

This test is performed with the EUT's Tx power requested to be at maximum power in selected technology/band, and DSI change is conducted during Tx power enforcement duration (i.e., during the time when EUT is forced to have Tx power at $P_{reserve}$).

3.2.6 Test configuration selection for change in time window

FCC specifies different time window for time averaging based on operation frequency. The criteria to select a test configuration for validating Smart Transmit feature and demonstrating the compliance during the change in time window is:

- Select any technology/band that has operation frequency classified in one time window defined by FCC (such as 100-seconds time window), and its corresponding P_{limit} is less than P_{max} if possible.
- Select the 2nd technology/band that has operation frequency classified in a different time window defined by FCC (such as 60-seconds time window), and its corresponding P_{limit} is less than P_{max} if possible.
- Note it is preferred both P_{limit} values of two selected technology/band less than corresponding P_{max} , but if not possible, at least one of technologies/bands has its P_{limit} less than P_{max} .

This test is performed with the EUT's Tx power requested to be at maximum power in selected technology/band. Test for one pair of time windows selected is sufficient as the feature operation is the same.

3.2.7 Test configuration selection for SAR exposure switching

If supported, the test configuration for SAR exposure switching should cover:

1. SAR exposure switch when two active radios are in the same time window
2. SAR exposure switch when two active radios are in different time windows. One test with two active radios in any two different time windows is sufficient as Smart Transmit operation is the same for RF exposure switch in any combination of two different time windows. For device supporting LTE + mmW NR, this test is covered in Section 8.2.3 and 8.2.4.

The Smart Transmit time averaging operation is independent of the source of SAR exposure (for example, LTE vs. Sub6 NR) and ensures total time-averaged RF exposure compliance. Hence, validation of Smart Transmit in any one simultaneous SAR transmission scenario (i.e., one combination for LTE + Sub6 NR transmission) is sufficient, where the SAR exposure varies among SAR_{radio1} only, SAR_{radio1} + SAR_{radio2}, and SAR_{radio2} only scenarios.

The criteria to select a test configuration for validating Smart Transmit feature during SAR exposure switching scenarios is:

- Select any two < 6GHz technologies/bands that the EUT supports simultaneous transmission (for example, LTE+Sub6 NR).
- Among all supported simultaneous transmission configurations, the selection order is
 1. select one configuration where both P_{limit} of radio1 and radio2 is less than their corresponding P_{max} , preferably, with different P_{limits} . If this configuration is not available, then,
 2. select one configuration that has P_{limit} less than its P_{max} for at least one radio. If this cannot be found, then,
 3. select one configuration that has P_{limit} of radio1 and radio2 greater than P_{max} but with least $(P_{limit} - P_{max})$ delta.

Test for one simultaneous transmission scenario is sufficient as the feature operation is the same.

3.3 Test procedures for conducted power measurements

This section provides general conducted power measurement procedures to perform compliance test under dynamic transmission scenarios described in Section 2. In practice, an adjustment can be made in these procedures. The justification/clarification may be provided.

3.3.1 Time-varying Tx power transmission scenario

This test is performed with the two pre-defined test sequences described in Section 3.1 for all the technologies and bands selected in Section 3.2.1. The purpose of the test is to demonstrate the effectiveness of power limiting enforcement and that the time-averaged SAR (corresponding time-averaged Tx power) does not exceed the FCC limit at all times (see Eq. (1a) and (1b)).

Test procedure:

1. Measure P_{max} , measure P_{limit} and calculate $P_{reserve}$ (= measured P_{limit} in dBm – *Reserve_power_margin* in dB) and follow Section 3.1 to generate the test sequences for all the technologies and bands selected in Section 3.2.1. Both test sequence 1 and test sequence 2 are created based on measured P_{max} and measured P_{limit} of the EUT. Test condition to measure P_{max} and P_{limit} is:
 - Measure P_{max} with Smart Transmit disabled and callbox set to request maximum power.
 - Measure 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 (3dB for this EUT based on Part 1 report) and reset power on EUT to enable Smart Transmit, establish radio link in desired radio configuration, with callbox requesting the EUT’s Tx power to be at pre-defined test sequence 1, measure and record Tx power versus time, and then convert the conducted Tx power into 1gSAR or 1gSAR value (see Eq. (1a)) using measured P_{limit} from above Step 1. Perform running time average to determine time-averaged power and 1gSAR or 1gSAR versus time as illustrated in Figure 3-1 where using 100-seconds time window as an example.

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

Note: For an easier computation of the running time average, 0 dBm can be added at the beginning of the test sequences the length of the responding time window, for example, add 0dBm for 100-seconds so the running time average can be directly performed starting with the first 100-seconds data using excel spreadsheet. This technique applies to all tests performed in this Part 2 report for easier time-averaged computation using excel spreadsheet.

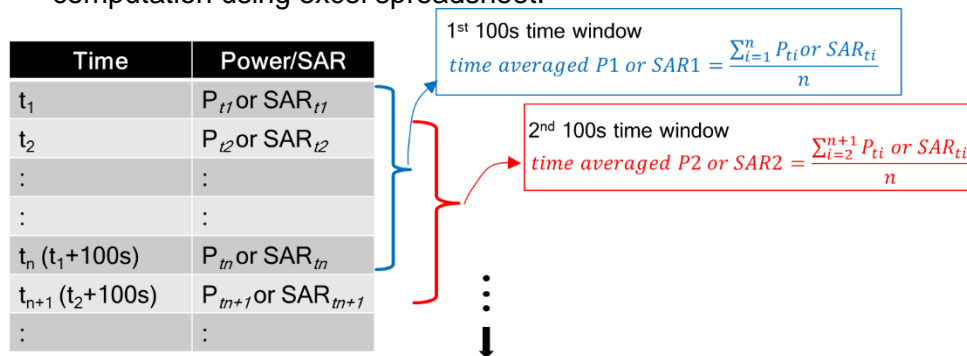


Figure A-1 100s running average illustration

3. Make one plot containing:
 - a. Instantaneous Tx power versus time measured in Step 2,
 - b. Requested Tx power used in Step 2 (test sequence 1),
 - c. Computed time-averaged power versus time determined in Step 2,
 - d. Time-averaged power limit (corresponding to FCC SAR limit of 1.6 W/kg for 1gSAR or 1.6W/kg for 1gSAR) given by:

$$Time\ averaged\ power\ limit = meas.P_{limit} + 10 \times \log\left(\frac{FCC\ SAR\ limit}{meas.SAR_P_{limit}}\right) \quad (5a)$$

where $meas.P_{limit}$ and $meas.SAR_P_{limit}$ correspond to measured power at P_{limit} and measured SAR at P_{limit} .

4. Make another plot containing:
 - a. Computed time-averaged 1gSAR or 1gSAR versus time determined in Step 2
 - b. FCC $1gSAR_{limit}$ of 1.6W/kg or FCC $1gSAR_{limit\ of\ 1.6}W/kg$.
5. Repeat Steps 2 ~ 4 for pre-defined test sequence 2 and replace the requested Tx power (test sequence 1) in Step 2 with test sequence 2.
6. Repeat Steps 2 ~ 5 for all the selected technologies and bands.
 The validation criteria are, at all times, the time-averaged power versus time shown in Step 3 plot shall not exceed the time-averaged power limit (defined in Eq. (5a)), in turn, the time-averaged 1gSAR or 1gSAR versus time shown in Step 4 plot shall not exceed the FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR (i.e., Eq. (1b)).

3.3.2 Change in call scenario

This test is to demonstrate that Smart Transmit feature accurately accounts for the past Tx powers during time-averaging when a new call is established.

The call disconnects and re-establishment needs to be performed during power limit enforcement, i.e., when the EUT's Tx power is at $P_{reserve}$ level, to demonstrate the continuity of RF exposure management and limiting in call change scenario. In other words, the RF exposure averaged over any FCC defined time window (including the time windows containing the call change) doesn't exceed FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR.

Test procedure:

1. Measure P_{limit} for the technology/band selected in Section 3.2.2. Measure 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.
3. Establish radio link with callbox in the selected technology/band.
4. Request EUT's Tx power at 0 dBm for at least one time window specified for the selected technology/band, followed by requesting EUT's Tx power to be at maximum power for about ~60 seconds, and then drop the call for ~10 seconds. Afterwards, re-establish another call in the same radio configuration (i.e., same technology/band/channel) and continue callbox requesting EUT's Tx power to be at maximum power for the remaining time of at least another full duration of the specified time window. Measure and record Tx power versus time. Once the measurement is done, extract instantaneous Tx power versus time, convert the measured conducted Tx power into 1gSAR or 1gSAR value using Eq. (1a), and then perform the running time average to determine time-averaged power and 1gSAR or 1gSAR versus time.
Note: In Eq.(1a), instantaneous Tx power is converted into instantaneous 1gSAR or 1gSAR value by applying the measured worst-case 1gSAR or 1gSAR value at P_{limit} for the corresponding technology/band/antenna/DSI reported in Part 1 report.
5. Make one plot containing: (a) instantaneous Tx power versus time, (b) requested power, (c) computed time-averaged power, (d) time-averaged power limit calculated using Eq.(5a).
6. Make another plot containing: (a) computed time-averaged 1gSAR or 1gSAR versus time, and (b) FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR.

The validation criteria are, at all times, the time-averaged power versus time shall not exceed the time-averaged power limit (defined in Eq.(5a)), in turn, the time-averaged 1gSAR or 1gSAR versus time shall not exceed the FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR (i.e., Eq. (1b)).

3.3.3 Change in technology and band

This test is to demonstrate the correct power control by Smart Transmit during technology switches and/or band handovers.

Similar to the change in call test in Section 3.3.2, to validate the continuity of RF exposure limiting during the transition, the technology and band handover needs to be performed when EUT's Tx power is at $P_{reserve}$ level (i.e., during Tx power enforcement) to make sure that the EUT's Tx power from previous $P_{reserve}$ level to the new $P_{reserve}$ level (corresponding to new technology/band). Since the P_{limit} could vary with technology and band, Eq. (1a) can be written as follows to convert the instantaneous Tx power in 1gSAR or 1gSAR exposure for the two given radios, respectively:

$$1g_or_10gSAR_1(t) = \frac{conducted_Tx_power_1(t)}{conducted_Tx_power_P_{limit_1}} * 1g_or_10gSAR_P_{limit_1} \quad (6a)$$

$$1g_or_10gSAR_2(t) = \frac{conducted_Tx_power_2(t)}{conducted_Tx_power_P_{limit_2}} * 1g_or_10gSAR_P_{limit_2} \quad (6b)$$

$$\frac{1}{T_{SAR}} \left[\int_{t-T_{SAR}}^{t_1} \frac{1g_or_10gSAR_1(t)}{FCC\ SAR\ limit} dt + \int_{t-T_{SAR}}^t \frac{1g_or_10gSAR_2(t)}{FCC\ SAR\ limit} dt \right] \leq 1 \quad (6c)$$

where, $conducted_Tx_power_1(t)$, $conducted_Tx_power_P_{limit_1}$, and $1g_or_10gSAR_P_{limit_1}$ correspond to the measured instantaneous conducted Tx power, measured conducted Tx power at P_{limit} , and measured 1gSAR or 10gSAR value at P_{limit} of technology1/band1; $conducted_Tx_power_2(t)$, $conducted_Tx_power_P_{limit_2}$, and $1g_or_10gSAR_P_{limit_2}$ correspond to the measured instantaneous conducted Tx power, measured conducted Tx power at P_{limit} , and measured 1gSAR or 10gSAR value at P_{limit} of technology2/band2. Transition from technology1/band1 to the technology2/band2 happens at time-instant ' t_1 '.

Test procedure:

1. Measure P_{limit} for both the technologies and bands selected in Section 3.2.3. Measure 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
3. Establish radio link with callbox in first technology/band selected.
4. Request EUT's Tx power at 0 dBm for at least one time window specified for the selected technology/band, followed by requesting EUT's Tx power to be at maximum power for about ~60 seconds, and then switch to second technology/band selected. Continue with callbox requesting EUT's Tx power to be at maximum power for the remaining time of at least another full duration of the specified time window. Measure and record Tx power versus time for the full duration of the test.
5. Once the measurement is done, extract instantaneous Tx power versus time, and convert the conducted Tx power into 1gSAR or 10gSAR value using Eq. (6a) and (6b) and corresponding measured P_{limit} values from Step 1 of this section. Perform the running time average to determine time-averaged power and 1gSAR or 10gSAR versus time.
Note: In Eq.(6a) & (6b), 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.
6. Make one plot containing: (a) instantaneous Tx power versus time, (b) requested power, (c) computed time-averaged power, (d) time-averaged power limit calculated using Eq.(5a).
7. Make another plot containing: (a) computed time-averaged 1gSAR or 10gSAR versus time, and (b) FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR.
The validation criteria are, at all times, the time-averaged 1gSAR or 10gSAR versus time shall not exceed the FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR (i.e., Eq. (6c)).

3.3.4 Change in antenna

This test is to demonstrate the correct power control by Smart Transmit during antenna switches from one antenna to another. The test procedure is identical to Section 3.3.3, by replacing technology/band switch operation with antenna switch. The validation criteria are, at all times, the time-averaged 1gSAR or 10gSAR versus time shall not exceed FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR.

Note: If the EUT does not support antenna switch within the same technology/band, but has multiple antennas to support different frequency bands, then the antenna switch test is included as part of change in technology and band (Section 3.3.3) test.

3.3.5 Change in DSI

This test is to demonstrate the correct power control by Smart Transmit during DSI switches from one DSI to another. The test procedure is identical to Section 3.3.3, by replacing technology/band switch operation with DSI switch. The validation criteria are, at all times, the time-averaged 1gSAR or 10gSAR versus time shall not exceed FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR.

3.3.6 Change in time window

This test is to demonstrate the correct power control by Smart Transmit during the change in averaging time window when a specific band handover occurs. FCC specifies time-averaging windows of 100s for Tx frequency < 3GHz, and 60s for Tx frequency between 3GHz and 6GHz.

To validate the continuity of RF exposure limiting during the transition, the band handover test needs to be performed when EUT handovers from operation band less than 3GHz to greater than 3GHz and vice versa. The equations (3a) and (3b) in Section 2 can be written as follows for transmission scenario having change in time window:

$$1gSAR_1(t) = \frac{\text{conducted_Tx_power_1}(t)}{\text{conducted_Tx_power_Plimit_1}} * 1g_or\ 10g_SAR_Plimit_1 \quad (7a)$$

$$1gSAR_2(t) = \frac{\text{conducted_Tx_power_2}(t)}{\text{conducted_Tx_power_Plimit_2}} * 1g_or\ 10g_SAR_Plimit_2 \quad (7b)$$

$$\frac{1}{T1_{SAR}} \left[\int_{t-T1_{SAR}}^{t_1} \frac{1g_or\ 10g_SAR_1(t)}{FCC\ SAR\ limit} dt \right] + \frac{1}{T2_{SAR}} \left[\int_{t-T2_{SAR}}^t \frac{1g_or\ 10g_SAR_2(t)}{FCC\ SAR\ limit} dt \right] \leq 1 \quad (7c)$$

where, $\text{conducted_Tx_power_1}(t)$, $\text{conducted_Tx_power_Plimit_1}(t)$, and $1g_or\ 10g_SAR_Plimit_1$ correspond to the instantaneous Tx power, conducted Tx power at P_{limit} , and compliance $1g_or\ 10g_SAR$ values at P_{limit_1} of band1 with time-averaging window ' $T1_{SAR}$ '; $\text{conducted_Tx_power_2}(t)$, $\text{conducted_Tx_power_Plimit_2}(t)$, and $1g_or\ 10g_SAR_Plimit_2$ correspond to the instantaneous Tx power, conducted Tx power at P_{limit} , and compliance $1g_or\ 10g_SAR$ values at P_{limit_2} of band2 with time-averaging window ' $T2_{SAR}$ '. One of the two bands is less than 3GHz, another is greater than 3GHz. Transition from first band with time-averaging window ' $T1_{SAR}$ ' to the second band with time-averaging window ' $T2_{SAR}$ ' happens at time-instant ' t_1 '

Test procedure:

1. Measure P_{limit} for both the technologies and bands selected in Section 3.2.6. Measure 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 enable Smart Transmit

Transition from 100s time window to 60s time window, and vice versa

3. Establish radio link with callbox in the technology/band having 100s time window selected in Section 3.2.6.
4. Request EUT's Tx power to be at 0 dBm for at least 100 seconds, followed by requesting EUT's Tx power to be at maximum power for about ~140 seconds, and then switch to second technology/band (having 60s time window) selected in Section 3.2.6. Continue with callbox requesting EUT's Tx power to be at maximum power for about ~60s in this second technology/band, and then switch back to the first technology/band. Continue with callbox requesting EUT's Tx power to be at maximum power for at least another 100s. Measure and record Tx power versus time for the entire duration of the test.

5. Once the measurement is done, extract instantaneous Tx power versus time, and convert the conducted Tx power into 1gSAR or 1gSAR value (see Eq. (7a) and (7b)) using corresponding technology/band Step 1 result, and then perform 100s running average to determine time-averaged 1gSAR or 1gSAR versus time. Note that in Eq.(7a) & (7b), instantaneous Tx power is converted into instantaneous 1gSAR or 1gSAR value by applying the worst-case 1gSAR or 1gSAR value tested in Part 1 for the selected technologies/bands at P_{limit} .
6. Make one plot containing: (a) instantaneous Tx power versus time measured in Step 4.
7. Make another plot containing: (a) instantaneous 1gSAR versus time determined in Step 5, (b) computed time-averaged 1gSAR versus time determined in Step 5, and (c) corresponding regulatory $1gSAR_{limit}$ of 1.6W/kg or $1gSAR_{limit\ of\ 1.6W/kg}$.

Transition from 60s time window to 100s time window, and vice versa

8. Establish radio link with callbox in the technology/band having 60s time window selected in Section 3.2.6.
9. Request EUT's Tx power to be at 0 dBm for at least 60 seconds, followed by requesting EUT's Tx power to be at maximum power for about ~80 seconds, and then switch to second technology/band (having 100s time window) selected in Section 3.2.6. Continue with callbox requesting EUT's Tx power to be at maximum power for about ~100s in this second technology/band, and then switch back to the first technology/band. Continue with callbox requesting EUT's Tx power to be at maximum power for the remaining time for a total test time of 500 seconds. Measure and record Tx power versus time for the entire duration of the test.
10. Repeat above Step 5~7 to generate the plots

The validation criteria is, at all times, the time-averaged 1gSAR or 1gSAR versus time shall not exceed the regulatory $1gSAR_{limit}$ of 1.6W/kg or $1gSAR_{limit\ of\ 1.6W/kg}$.

3.3.7 SAR exposure switching

This test is to demonstrate that Smart Transmit feature is accurately accounts for switching in exposures among SAR from radio1 only, SAR from both radio1 and radio2, and SAR from radio2 only scenarios, and ensures total time-averaged RF exposure complies with the FCC limit. Here, radio1 represents primary radio (for example, LTE anchor in a NR non-standalone mode call) and radio2 represents secondary radio (for example, sub6 NR or mmW NR). The detailed test procedure for SAR exposure switching in the case of LTE+Sub6 NR non-standalone mode transmission scenario is provided in Appendix B.2.

Test procedure:

1. Measure conducted Tx power corresponding to P_{limit} for radio1 and radio2 in selected band. Test condition to measure conducted P_{limit} is:
 - Establish device in call with the callbox for radio1 technology/band. Measure conducted Tx power corresponding to radio1 P_{limit} with Smart Transmit enabled and *Reserve_power_margin* set to 0 dB, callbox set to request maximum power.
 - Repeat above step to measure conducted Tx power corresponding to radio2 P_{limit} . If radio2 is dependent on radio1 (for example, non-standalone mode of Sub6 NR requiring radio1 LTE as anchor), then establish radio1 + radio2 call with callbox, and request all down bits for radio1 LTE. In this scenario, with callbox requesting maximum power from radio2 Sub6 NR, measured conducted Tx power corresponds to radio2 P_{limit} (as radio1 LTE is at all-down bits)
2. Set *Reserve_power_margin* to actual (intended) value, with EUT setup for radio1 + radio2 call. In this description, it is assumed that radio2 has lower priority than radio1. Establish device in radio1+radio2 call, and request all-down bits or low power on radio1, with callbox requesting EUT's Tx power to be at maximum power in radio2 for at least one time window. After one time window, set callbox to request EUT's Tx power to be at maximum power on radio1, i.e., all-up bits. Continue radio1+radio2 call with both radios at maximum power for at least one time window, and drop (or request all-down bits on) radio2. Continue radio1 at maximum power for at least one time window. Record the conducted Tx power for both radio1 and radio2 for the entire duration of this test.
3. Once the measurement is done, extract instantaneous Tx power versus time for both radio1 and radio2 links. Convert the conducted Tx power for both these radios into 1gSAR or 1gSAR value (see Eq. (6a) and (6b)) using corresponding technology/band P_{limit} measured in Step 1, and then perform the running time average to determine time-averaged 1gSAR or 1gSAR versus time.
4. Make one plot containing: (a) instantaneous Tx power versus time measured in Step 2.
5. Make another plot containing: (a) instantaneous 1gSAR versus time determined in Step 3, (b) computed time-averaged 1gSAR versus time determined in Step 3, and (c) corresponding regulatory $1gSAR_{limit}$ of 1.6W/kg or $1gSAR_{limit\ of\ 1.6W/kg}$.

The validation criteria is, at all times, the time-averaged 1gSAR or 1gSAR versus time shall not exceed the regulatory $1gSAR_{limit}$ of 1.6W/kg or $1gSAR_{limit\ of\ 1.6W/kg}$.

3.4 Test procedure for time-varying SAR measurements

This section provides general time-varying SAR measurement procedures to perform compliance test under dynamic transmission scenarios described in Section 2. In practice, an adjustment can be made in these procedures. The justification/clarification may be provided.

To perform the validation through SAR measurement for transmission scenario 1 described in Section 2, the “path loss” between callbox antenna and EUT needs to be calibrated to ensure that the EUT Tx power reacts to the requested power from callbox in a radiated call. It should be noted that when signaling in closed loop mode, protocol-level power control is in play, resulting in EUT not solely following callbox TPC (Tx power control) commands. In other words, EUT response has many dependencies (RSSI, quality of signal, path loss variation, fading, etc.) other than just TPC commands. These dependencies have less impact in conducted setup (as it is a controlled environment and the path loss can be very well calibrated) but have significant impact on radiated testing in an uncontrolled environment, such as SAR test setup. Therefore, the deviation in EUT Tx power from callbox requested power is expected, however the time-averaged SAR should not exceed FCC SAR requirement at all times as Smart Transmit controls Tx power at EUT.

The following steps are for time averaging feature validation through SAR measurement:

1. “Path Loss” calibration: Place the EUT against the phantom in the worst-case position determined based on Section 3.2.1. For each band selected, prior to SAR measurement, perform “path loss” calibration between callbox antenna and EUT. Since the SAR test environment is not controlled and well calibrated for OTA (Over the Air) test, extreme care needs to be taken to avoid the influence from reflections. The test setup is described in Section 7.1.
2. Time averaging feature validation:
 - i For a given radio configuration (technology/band) selected in Section 3.2.1, enable Smart Transmit and set *Reserve_power_margin* to 0 dB, with callbox to request maximum power, perform area scan, conduct pointSAR measurement at peak location of the area scan. This point SAR value, *pointSAR_Plimit*, corresponds to point SAR at the measured *Plimit* (i.e., measured *Plimit* from the EUT in Step 1 of Section 3.3.1).
 - ii Set *Reserve_power_margin* to actual (intended) value and reset power on EUT to enable Smart Transmit. Note, if *Reserve_power_margin* cannot be set wirelessly, care must be taken to re-position the EUT in the exact same position relative to the SAM phantom as in above Step 2.i. Establish radio link in desired radio configuration, with callbox requesting the EUT’s Tx power at power levels described by test sequence 1 generated in Step 1 of Section 3.3.1, conduct point SAR measurement versus time at peak location of the area scan determined in Step 2.i of this section. Once the measurement is done, extract instantaneous point SAR vs time data, *pointSAR(t)*, and convert it into instantaneous 1gSAR or 1gSAR vs. time using Eq. (3a), re-written below:

$$1g_or_10gSAR(t) = \frac{pointSAR(t)}{pointSAR_Plimit} * 1g_or_10gSAR_Plimit$$

where, *pointSAR_Plimit* is the value determined in Step 2.i, and *pointSAR(t)* is the instantaneous point SAR measured in Step 2.ii, *1g_or_10gSAR_Plimit* is the measured 1gSAR or 1gSAR value listed in Part 1 report.

- iii Perform 100s running average to determine time-averaged 1gSAR or 1gSAR versus time.
- iv Make one plot containing: (a) time-averaged 1gSAR or 1gSAR versus time determined in Step 2.iii of this section, (b) FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR.
- v Repeat 2.ii ~ 2.iv for test sequence 2 generated in Step 1 of Section 3.3.1.
- vi Repeat 2.i ~ 2.v for all the technologies and bands selected in Section 3.2.1.

The time-averaging validation criteria for SAR measurement is that, at all times, the time-averaged 1gSAR or 1gSAR versus time shall not exceed FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 1gSAR (i.e., Eq. (3b)).

4 Test Configurations

4.1 WWAN (sub-6) transmission

The P_{limit} values, corresponding to 1.0 W/kg (1gSAR) of SAR_{design_target} , for technologies and bands supported by EUT are derived in Part 0 report and summarized in Table 4-1. Note all P_{limit} power levels entered in Table 4-1 correspond to average burst power levels plus tolerance after accounting for duty cycle in the case of TDD modulation schemes (for e.g., GSM, LTE TDD & Sub6 NR TDD).

Table 4-1: P_{limit} for supported technologies and bands (P_{limit} in EFS file)

Tech/Band	Port	Worst-case SAR (W/kg)	P_{limit} Max Tune-up Burst Power (dBm)	Port	Worst-case SAR (W/kg)	P_{limit} Max Tune-up Burst Power (dBm)
GSM850	B	0.788	31.00	A	0.758	32.50
GSM1900	D	0.998	25.00	A	0.966	22.50
W-CDMA B2	D	0.953	19.00	D	0.968	20.25
W-CDMA B4	B	0.993	18.50	B	0.995	17.25
W-CDMA B5	B	0.696	23.90	A	0.750	25.70
CDMA BC0	B	0.772	23.90	A	0.883	25.70
CDMA BC1	B	0.898	20.00	A	0.957	16.50
CDMA BC10	B	0.755	23.90	A	0.894	25.70
LTE B5	B	0.755	24.50	A	0.697	25.70
LTE B7	B	0.996	16.50	C	0.982	18.00
LTE B12	B	0.664	23.90	A	0.679	25.70
LTE B13	B	0.609	23.90	A	0.753	25.70
LTE B25	D	0.952	19.00	C	0.977	19.50
LTE B26	B	0.754	24.50	A	0.914	25.70
LTE B30	B	0.997	19.75	A	0.982	21.00
LTE B41	D	0.989	21.75	B	0.996	19.75
LTE B48	D	0.976	18.50	C	0.997	22.50
LTE B66	B	0.992	18.50	B	0.995	17.25
FR1 n5	B	0.576	24.50	B	0.458	24.50
FR1 n12	B	0.404	23.90	A	0.381	25.70
FR1 n25	B	0.521	20.00	D	0.892	20.25
FR1 n41	B	0.734	16.50	C	0.833	18.00
FR1 n66	D	0.549	20.00	A	0.698	17.00
FR1 n77	B	0.997	17.50	A	0.984	18.25

* Maximum target power, P_{limit} , is configured in NV settings in EUT to limit maximum average transmitting power. This power is converted into peak power in NV settings for TDD schemes.

Based on selection criteria described in Section 3.2.1, the selected technologies/bands for testing time-varying test sequences are highlighted in Table 4-1. During Part 2 testing, the *Reserve_power_margin* (dB) for A2403, A2404, A2405 is set to 3dB in EFS.

As Part 1 and Part 2 testing took place in parallel the selected technologies/bands were chosen based upon anticipated values encountered during pretesting before Tx powers were finalized.

The radio configurations used in Part 2 test for selected technologies, bands, DSIs and antennas are listed in Table 4-2. The corresponding worst-case radio configuration 1g SAR or 1g SAR values for selected technology/band/D SI are extracted from Part 1 report and are listed in the last column of Table 5-2.

Based on equations (1a), (2a), (3a) and (4a), it is clear that Part 2 testing outcome is normalized quantity, which implies that it can be applied to any radio configuration within a selected technology/band/D SI. Thus, as long as applying the worst-case SAR obtained from the worst radio configuration in Part 1 testing to calculate time-varying SAR exposure in equations (1a), (2a), (3a) and (4a), the accuracy in compliance demonstration remains the same.

Table 4-2: Radio configurations selected for Part 2 test

Part 2 Test Configurations											Part 1 worst-case radio config 1g SAR measured at Plim (W/kg)
Test Case	Test Scenario	Tech	Band	Ant	DSI	Channel	Freq	RB/Offset	Mode	Detail	
1	time-varying Tx power transmission (Seq1/Seq2) for conducted	GSM	1900	2	1	661	1880	N/A	B	GSM Rear/1g/5mm	0.914
3		WCDMA	BIV	2	1	1413	1732.6	N/A	B	UMTS Edge 1/1g/5mm	0.995
5		CDMA	BC1	1	1	600	1880	N/A	B	CDMA Edge 3/1g/5mm	0.957
7		LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	0.905
9		sub6 NR	n66	1	1	349000	1745	1/49	B	NR Edge 3/1g/5mm	0.698
11	call drop for conducted power test	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	0.905
12	tech/band for conducted power test	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	0.905
		LTE	B30	1	1	27710	2310	1/24	B	LTE Rear/1g/5mm	0.982
13	DSI switch for conducted power test	LTE	B30	2	1	27710	2310	1/24	B	LTE Rear/1g/5mm	0.908
		LTE	B30	2	0	27710	2310	1/24	A	LTE RT/1g/5mm	0.997
14	Time-window/Ant switch for	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	0.905
		LTE	B48	7	1	56207	3646.7	1/49	B	LTE Edge 2/1g/5mm	0.658
15	SAR exposure switch for conducted power test	ENDC	B5	2	1	20525	836.5	1/24	B	LTE Rear/1g/5mm	0.373
			n66	1	1	349000	1745	1/49	B	NR Edge 3/1g/5mm	0.698
16	SAR exposure switch for conducted power test	interband ULCA	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	0.905
			B12	2	1	23095	707.5	1/24	B	LTE Rear/1g/5mm	0.352

Note: Reported SAR values in UL SAR report 13259310-S1 are tested at $P_{lim} + \text{tolerance}$ therefor 100s average SAR is shown to be ± 1 dB from SAR design target $+1$ dB = 1 W/kg

Based on the selection criteria described in Section 3.2, the radio configurations for the Tx varying transmission test cases listed in Section 2 are:

1. Technologies and bands for time-varying Tx power transmission: The test case 1~10 listed in Table 4-2 are selected to test with the test sequences defined in Section 3.1 in both time-varying conducted power measurement and time-varying SAR measurement.
2. Technology and band for change in call test: LTE 66 having the lowest P_{limit} among all technologies and bands (test case 11 in Table 4-2) is selected for performing the call drop test in conducted power setup.
3. Technologies and bands for change in technology/band test: Following the guidelines in Section 3.2.3 and 3.2.4, test case 12 in Table 4-2 is selected for handover test from a technology/band/antenna with lowest P_{limit} within one technology group (LTE 66, DSI=1 antenna 1), to a technology/band in the same DSI with highest P_{limit} within another technology group (Tech 30, DSI=1, antenna 1) in conducted power setup.
4. Technologies and bands for change in DSI: Based on selection criteria in Section 3.2.5, for a given technology and band, test case 13 in Table 4-2 is selected for DSI switch test by establishing a call in LTE 30 in DSI=1, and then handing over to DSI = 0 exposure scenario in conducted power setup.

5. Technologies and bands for change in time-window/antenna: Based on selection criteria in Section 3.2.6, for a given DSI=1, test case 14 in Table 4-2 is selected for time window switch between 100s window (LTE 66, Antenna 1) and 60s window (LTE 48, Antenna 7) in conducted power setup.
6. Technologies and bands for switch in SAR exposure: Based on selection criteria in Section 3.2.7 Scenario 1, test case 15 in Table 4-2 is selected for SAR exposure switching test in one of the supported simultaneous WWAN transmission scenario, i.e., LTE + Sub6 NR active in the same 100s time window, in conducted power setup. Since this device supports LTE+mmW NR, test for Section 3.2.7 Scenario 2 for RF exposure switch is covered in Sections 8.2.3 and 8.2.4 between LTE (100s window) and mmW NR (4s window).

5 Conducted Power Test Results for Sub-6 Smart Transmit Feature Validation

5.1 Measurement setup

The Rohde & Schwarz CMW500 callbox is used in this test. The test setup picture and schematic are shown in Figures 6-1a & 6-1c for measurements with a single antenna of EUT, and in Figures 6-1b & 6-1d for measurements involving antenna switch (see Appendix C for missing figures). For single antenna measurement, one port (RF1 COM) of the callbox is connected to the RF port of the EUT using a directional coupler. For antenna & technology switch measurement, two ports (RF1 COM and RF3 COM) of the callbox used for signaling two different technologies are connected to a combiner, which is in turn connected to a directional coupler. The other end of the directional coupler is connected to a splitter to connect to two RF ports of the EUT corresponding to the two antennas of interest. In both the setups, power meter is used to tap the directional coupler for measuring the conducted output power of the EUT. For time averaging validation test (Section 3.3.1), call drop test (Section 3.3.2), and DSI switch test (Section 3.3.4), only RF1 COM port of the callbox is used to communicate with the EUT. For technology/band switch measurement (Section. 3.3.3), both RF1 COM and RF3 COM port of callbox are used to switch from one technology communicating on RF1 COM port to another technology communicating on RF3 COM port. Note that for this EUT, antenna switch test (Section 3.3.4) is included within time-window switch test (Section 3.3.6) as the selected technology/band combinations for the time-window switch test are on two different antennas. All the path losses from RF port of EUT to the callbox RF COM port and to the power meter are calibrated and automatically entered as offsets in the callbox and the power meter via test scripts on the PC used to control callbox and power meter.

LTE+Sub6 NR test setup:

If LTE conducted port and Sub6 NR conducted port are same on this EUT (i.e., they share the same antenna), then low-/high-pass filter is used to separate LTE and Sub6 NR signals for power meter measurement via directional couplers, as shown in below Figures 6-1a, 6-1b & 6-1c.

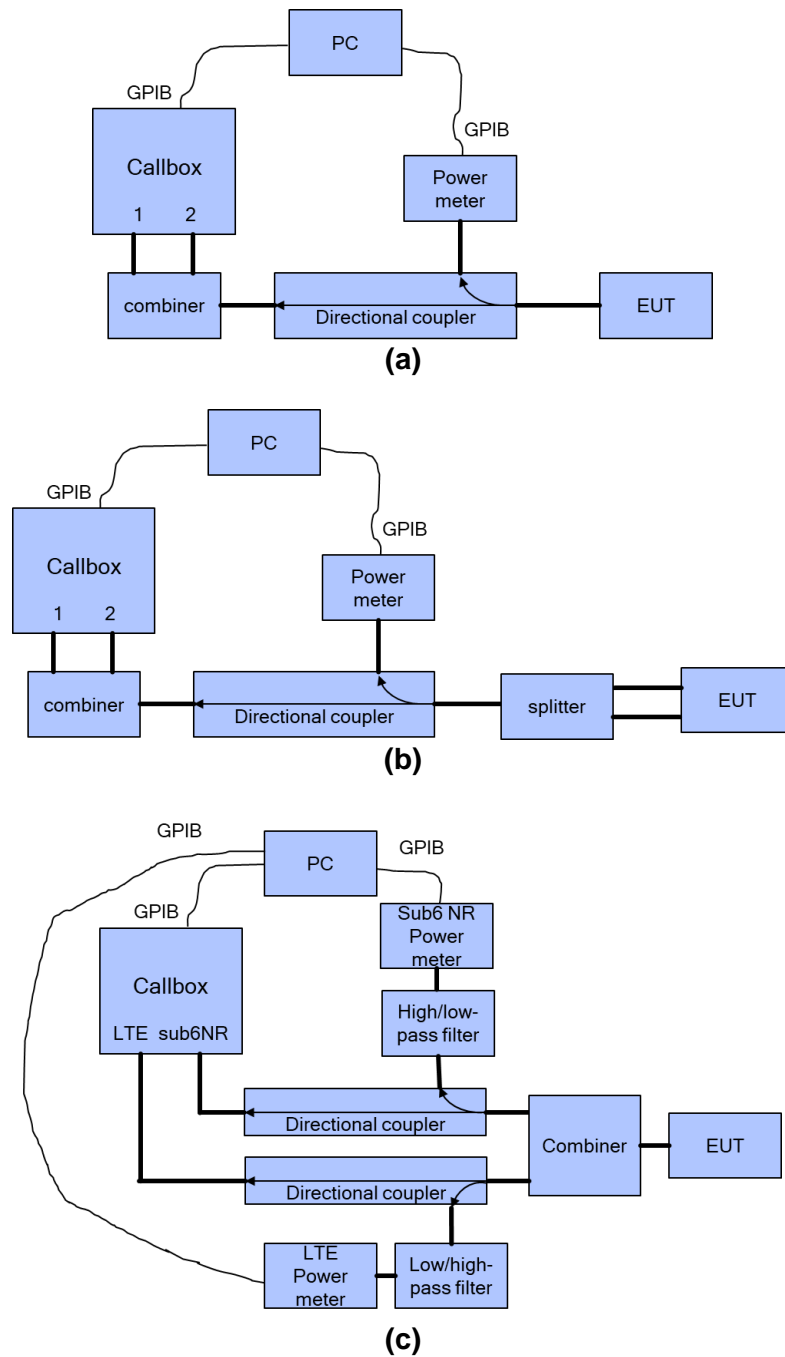


Figure A-1: Example conducted power measurement setup

Both the callbox and power meter are connected to the PC using GPIB cables. Two test scripts are custom made for automation, and the test duration set in the test scripts is 500 seconds.

For time-varying Tx power measurement, the PC runs the 1st test script to send GPIB commands to control the callbox's requested power versus time, while at the same time to record the conducted power measured at EUT RF port using the power meter. The commands sent to the callbox to request power are:

- 0dBm for 100 seconds
- Test sequence 1 or test sequence 2 (defined in Section 3.1 and generated in Section 3.2.1), for 360 seconds
- Stay at the last power level of test sequence 1 or test sequence 2 for the remaining time. Power meter readings are periodically recorded every 100ms. A running average of this measured Tx power over 100 seconds is performed in the post-data processing to determine the 100s-time averaged power.

For call drop, technology/band/antenna switch, and DSI switch tests, after the call is established, the callbox is set to request the EUT's Tx power at 0dBm for 100 seconds while simultaneously starting the 2nd test script runs at the same time to start recording the Tx power measured at EUT RF port using the power meter. After the initial 100 seconds since starting the Tx power recording, the callbox is set to request maximum power from the EUT for the rest of the test. Note that the call drop/re-establish, or technology/band/antenna switch or DSI switch is manually performed when the Tx power of EUT is at $P_{reserve}$ level. See Section 3.3 for detailed test procedure of call drop test, technology/band/antenna switch test and DSI switch test.

5.2 P_{limit} and P_{max} measurement results

The measured P_{limit} for all the selected radio configurations given in Table 4-2 are listed in below Table 6-1. P_{max} was also measured for radio configurations selected for testing time-varying Tx power transmission scenarios in order to generate test sequences following the test procedures in Section 3.1.

Table 5-1: Measured P_{limit} and P_{max} of selected radio configurations
 Note: the device uncertainty of P_{max} is +1dB/-1dB as provided by manufacturer.

Test Case	Test Scenario	Tech	Band	Antenna	DSI	Channel	Freq	RB/offset	Mode	Detail(s)	P_{limit} (Burst)	Tune-up Target Power P_{max} (Burst)	Measured P_{lim}
1	time-varying Tx power transmission (Seq1/Seq2) for conducted power	GSM	1900	2	1	661	1880	N/A	B	GSM Rear/1g/5mm	26.3	28.5	26.3
3		WCDMA	BIV	2	1	1413	1732.6	N/A	B	UMTS Edge 1/1g/5mm	17.3	23.1	17.3
5		CDMA	BC1	1	1	600	1880	N/A	B	CDMA Edge 3/1g/5mm	16.5	25.7	16.3
7		LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	17.0	25.7	16.5
9		sub6 NR	n66	1	1	349000	1745	1/49	B	NR Edge 3/1g/5mm	17.0	25.7	17.0
11	call drop for conducted power test	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	17.0	25.7	16.5
12	tech/band for conducted power test	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	17.0	25.7	16.5
		LTE	B30	1	1	27710	2310	1/24	B	LTE Rear/1g/5mm	21.0	25.7	21.0
13	DSI switch for conducted power test	LTE	B30	2	1	27710	2310	1/24	B	LTE Rear/1g/5mm	20.8	22.8	20.5
		LTE	B30	2	0	27710	2310	1/24	A	LTE RT/1g/5mm	19.8	22.8	19.8
14	Time-window/Ant switch for conducted power test	LTE	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	17.0	25.7	16.5
		LTE	B48	7	1	56207	3646.7	1/49	B	LTE Edge 2/1g/5mm	21.0	22.8	20.5
15	SAR exposure switch for conducted power test	ENDC	B5	2	1	20525	836.5	1/24	B	LTE Rear/1g/5mm	24.5	24.5	24.0
			n66	1	1	349000	1745	1/49	B	NR Edge 3/1g/5mm	17.0	25.7	17.0
16		interband ULCA	B66	1	1	132322	1745	1/49	B	LTE Edge 3/1g/5mm	17.0	25.7	16.5
			B12	2	1	23095	707.5	1/24	B	LTE Rear/1g/5mm	23.9	23.9	23.3

Note – tests including duty-cycle transmit are normalized to frame average.

5.3 Time-varying Tx power measurement results

The measurement setup is shown in Figures 6-1(a) and 6-1(c). The purpose of the time-varying Tx power measurement is to demonstrate the effectiveness of power limiting enforcement and that the time-averaged Tx power when represented in time-averaged 1gSAR or 10gSAR values does not exceed FCC limit as shown in Eq. (1a) and (1b), rewritten below:

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

$$\frac{\frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t 1g_or_10gSAR(t) dt}{FCC\ SAR\ limit} \leq 1 \quad (1b)$$

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 and 10gSAR values at P_{limit} reported in Part 1 test (listed in Table 4-2 of this report as well).

Following the test procedure in Section 3.3, the conducted Tx power measurement for all selected configurations are reported in this section. In all the conducted Tx power plots, the dotted line represents the requested power by callbox (test sequence 1 or test sequence 2), the blue curve represents the instantaneous conducted Tx power measured using power meter, the green curve represents time-averaged power and red line represents the conducted power limit that corresponds to FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR .

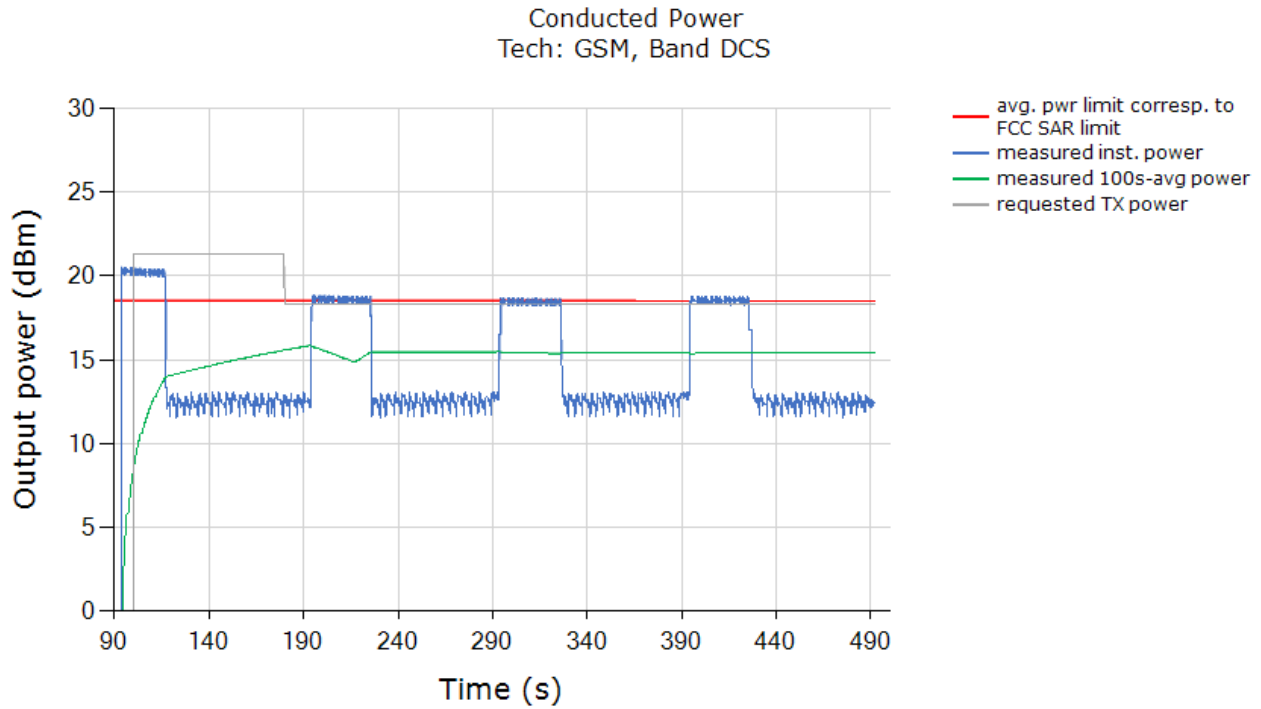
Similarly, in all the 1g or 10gSAR plots (when converted using Eq. (1a)), the green curve represents the 100s/60s-time averaged 1gSAR or 10gSAR value calculated based on instantaneous 1gSAR or 10gSAR ; and the red line limit represents the FCC limit of 1.6 W/kg for 1gSAR or 1.6 W/kg for 10gSAR .

Time-varying Tx power measurements were conducted on test cases #1 ~ #10 in Table 4-2, by generating test sequence 1 and test sequence 2 given in Appendix A using measured P_{limit} and measured P_{max} (last two columns of Table 6-1) for each of these test cases. Measurement results for test cases #1 ~ #10 are given in Sections 6.3.1 - 6.3.10.

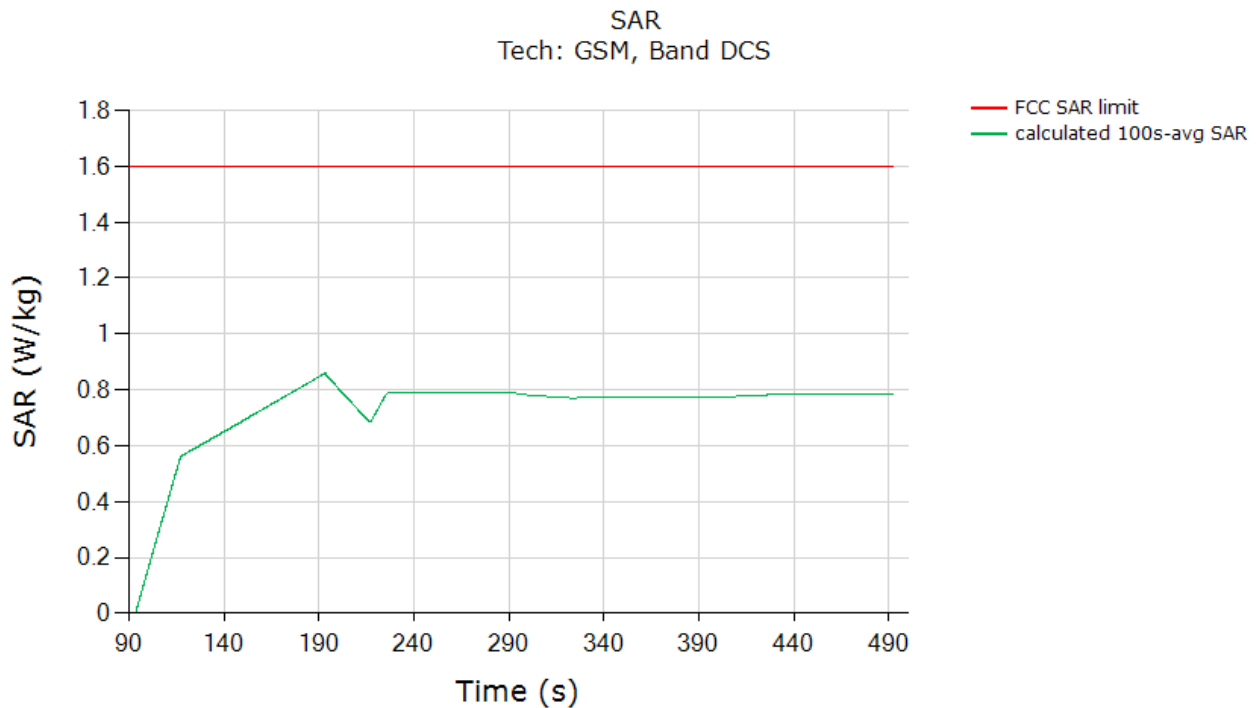
Test case reduction has been implemented in this report per Qualcomm guidance for multiple EUT using same chipset. For all test cases, refer to model A2172 (FCC ID: BCG-E3542A).

5.3.1 GSM 1900 Ant 2 (test case 1 in Table 4-2)

Test result for test sequence 1:



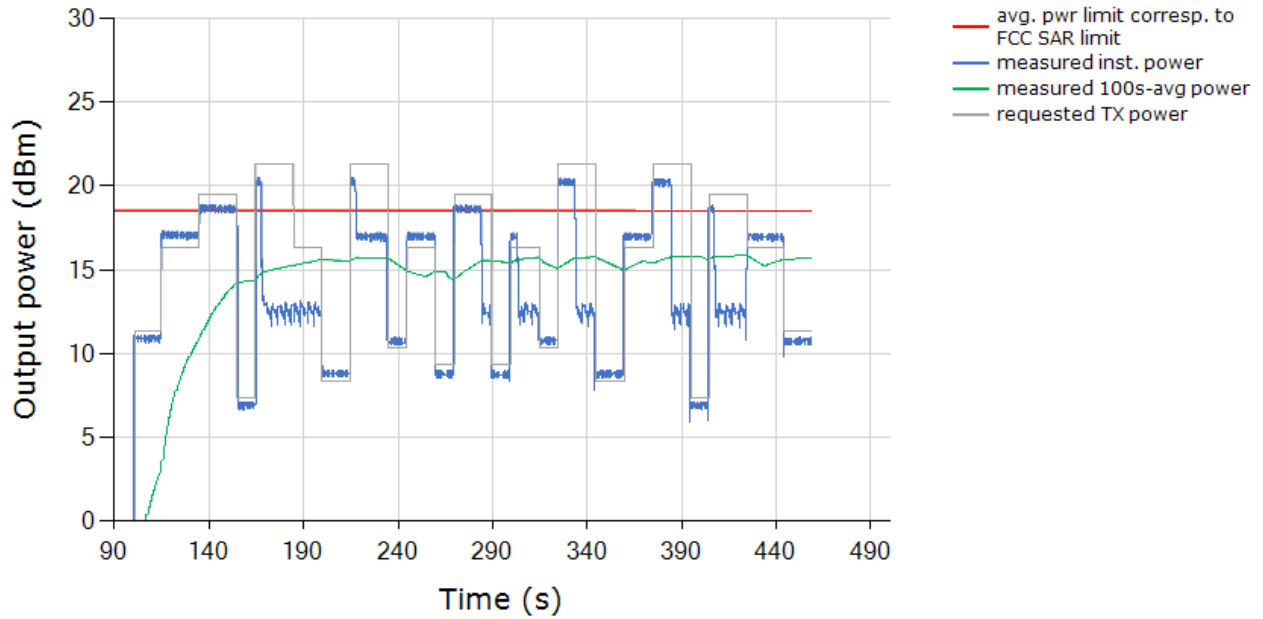
Above time-averaged conducted Tx power is converted/calculated into time-averaged 1g SAR using Equation (1a) and plotted below to demonstrate that the time-averaged 1g SAR versus time does not exceed the FCC limit of 1.6 W/kg for 1gSAR:



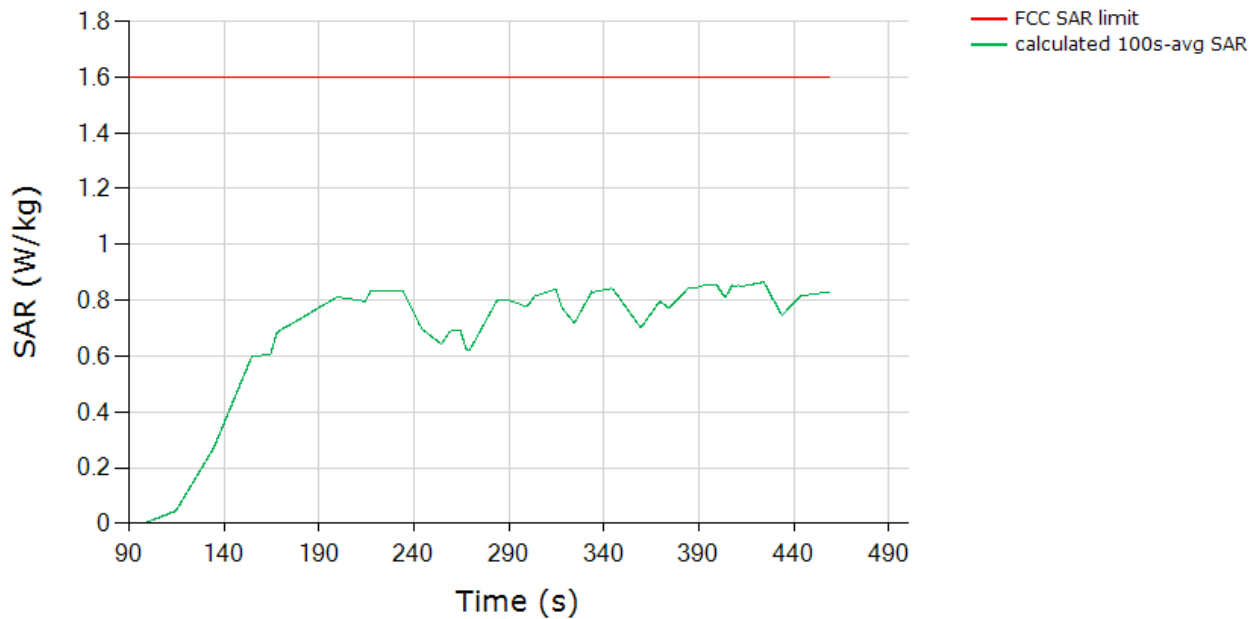
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	0.859
Validated	

Test result for test sequence 2:

Conducted Power
Tech: GSM, Band DCS

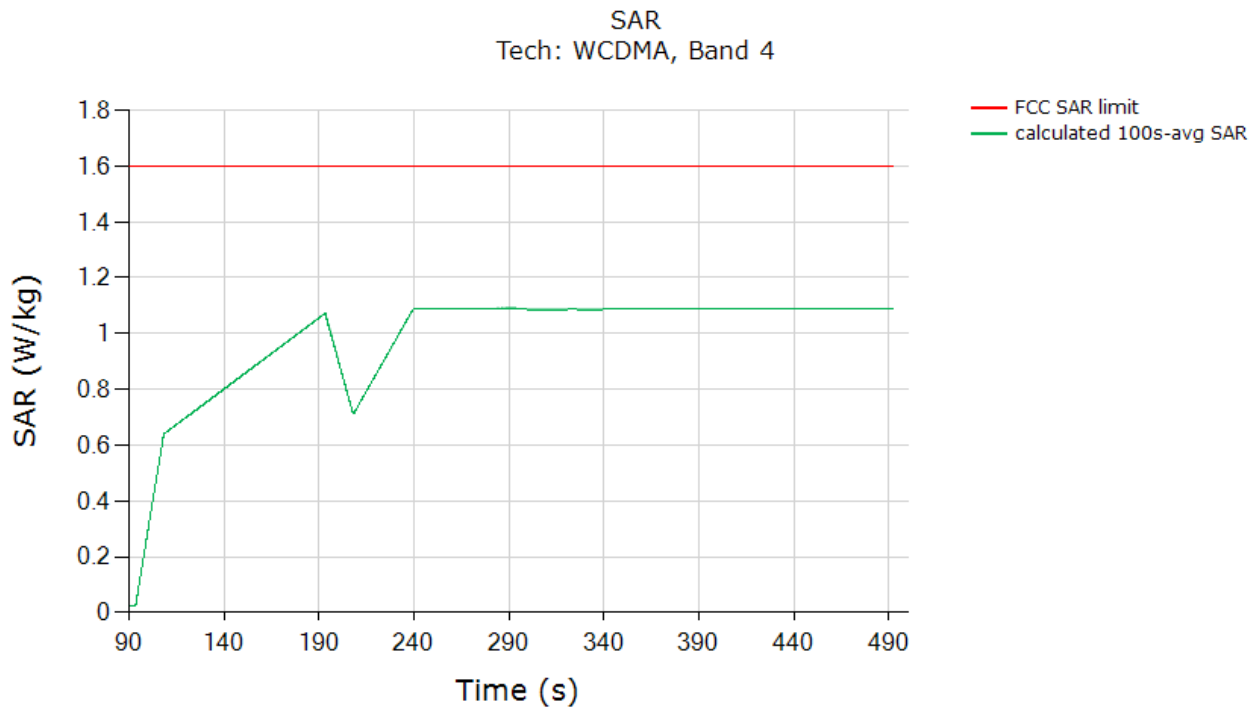
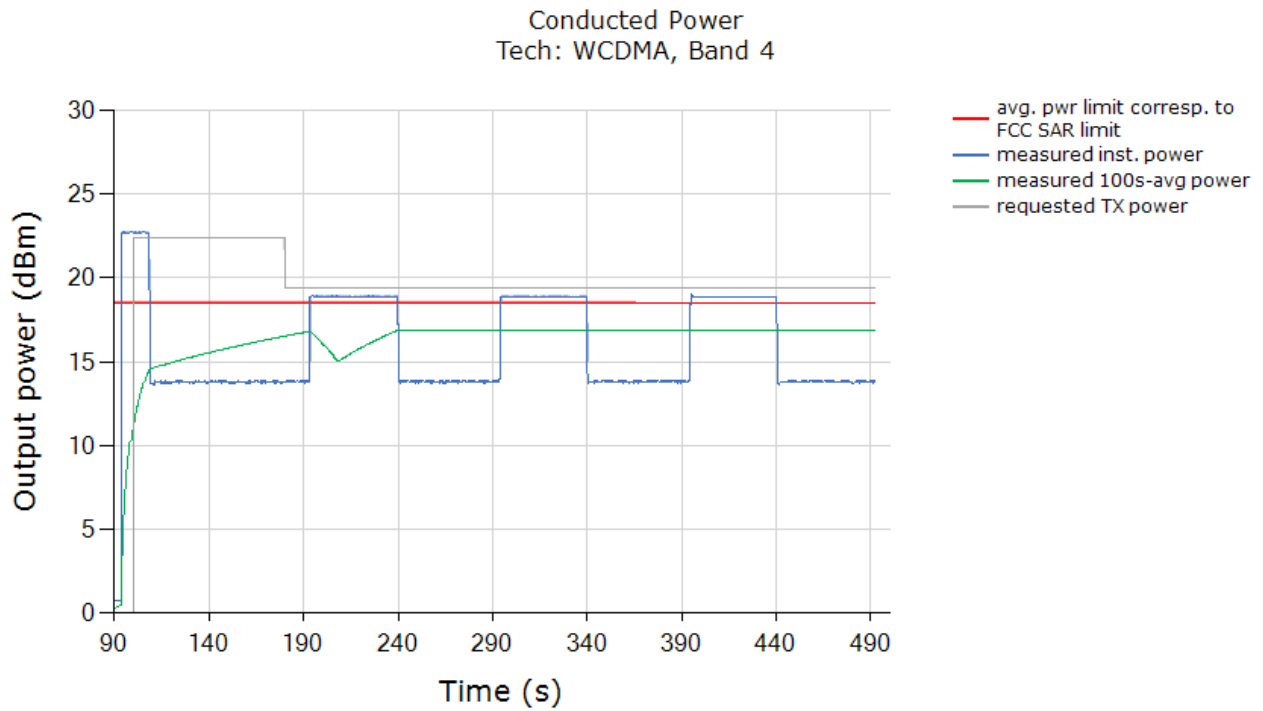


SAR
Tech: GSM, Band DCS



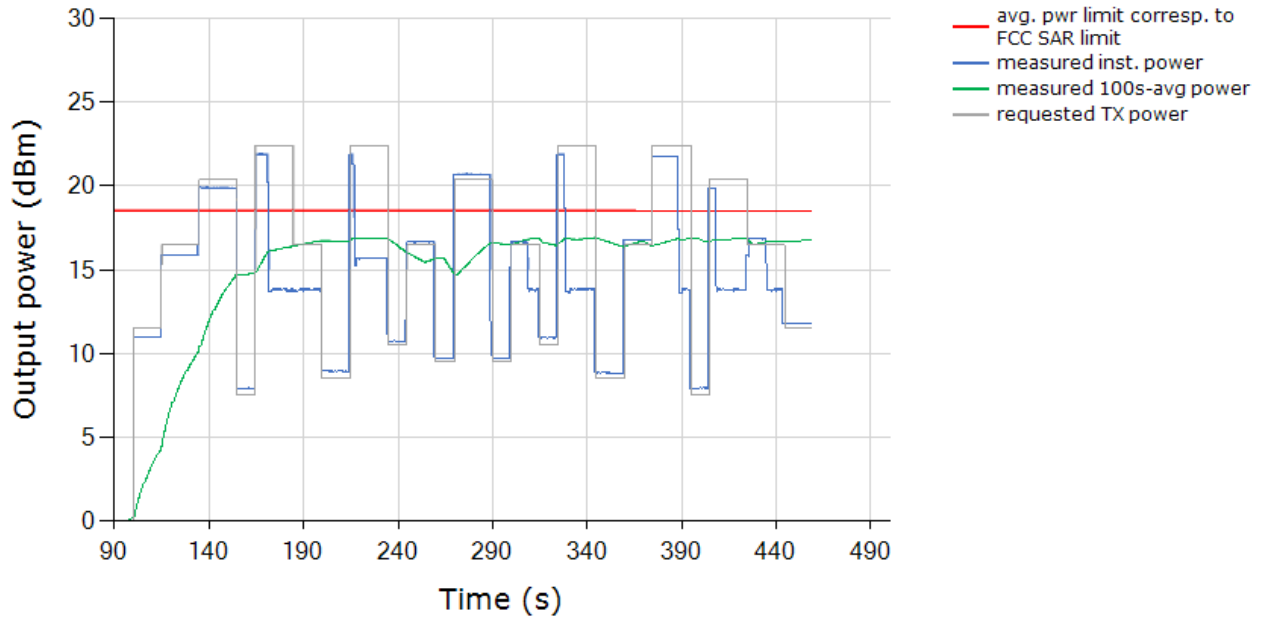
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	0.864
Validated	

5.3.2 WCDMA Band IV Ant 2 (test case 3 in Table 4-2)

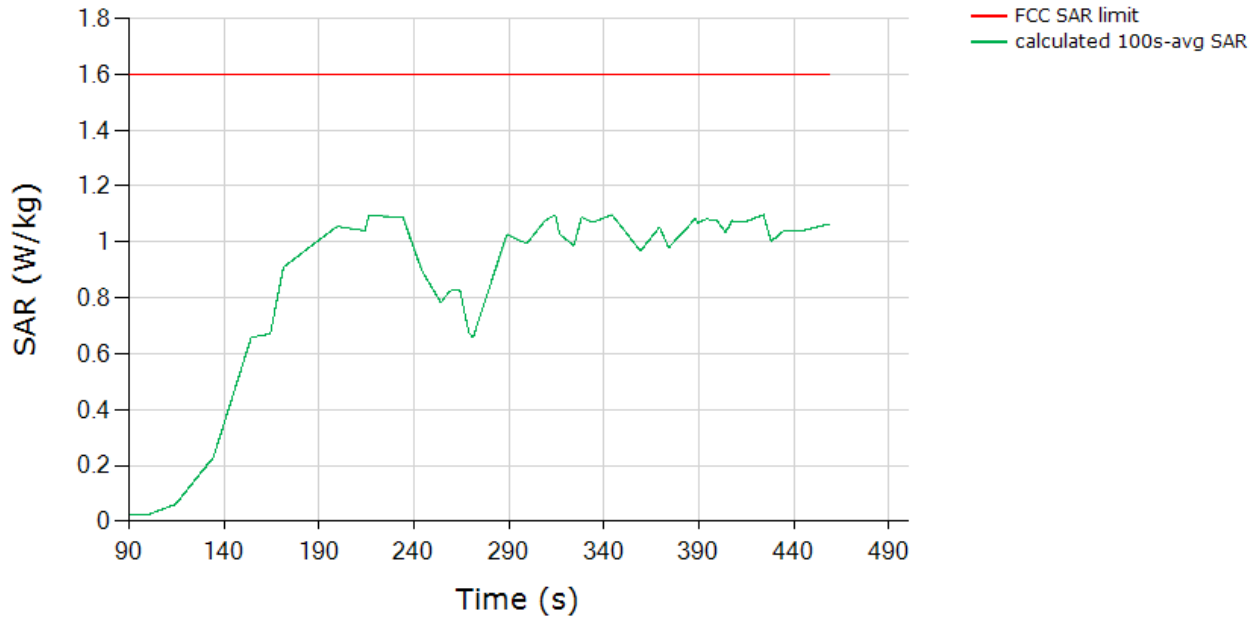


	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	1.09
Validated	

Conducted Power
Tech: WCDMA, Band 4



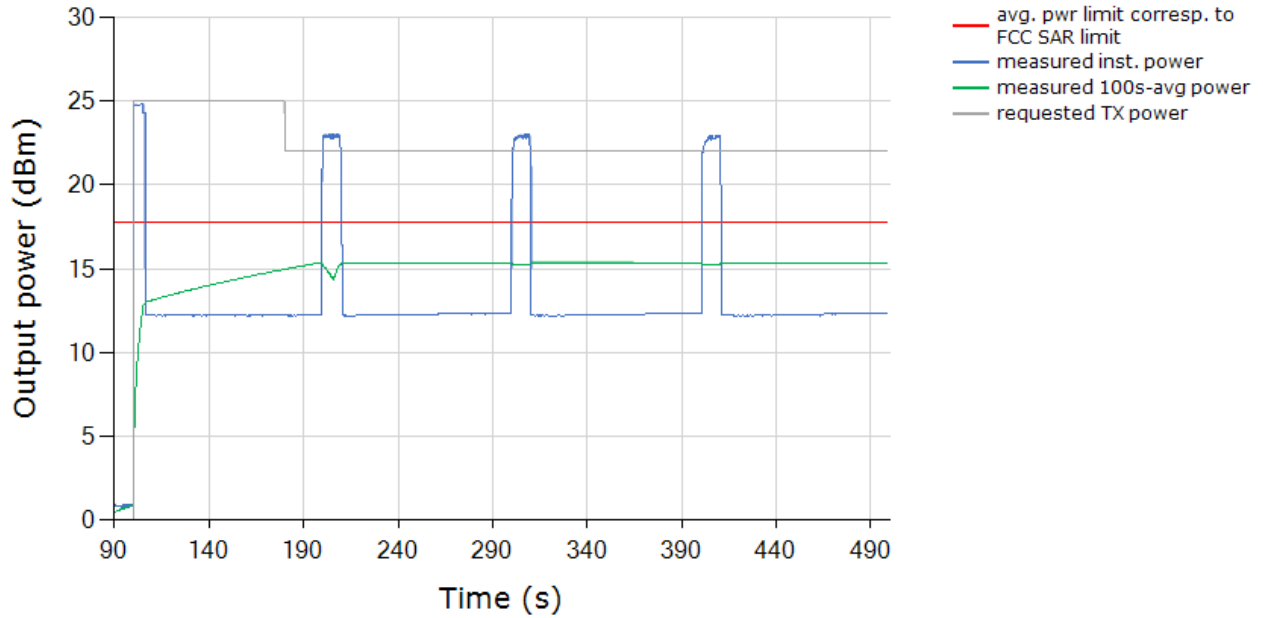
SAR
Tech: WCDMA, Band 4



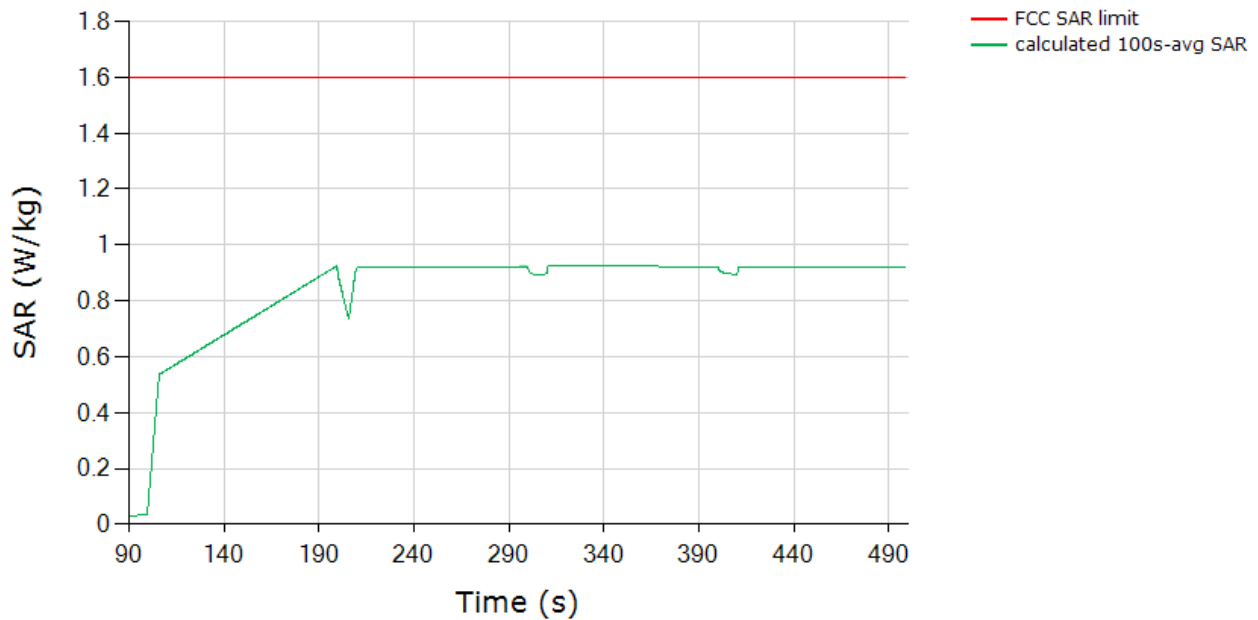
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	1.097
Validated	

5.3.3 CDMA Band BC1 Ant 1 (test case 5 in Table 4-2)

Conducted Power
Tech: CDMA, Band CDMA 1900

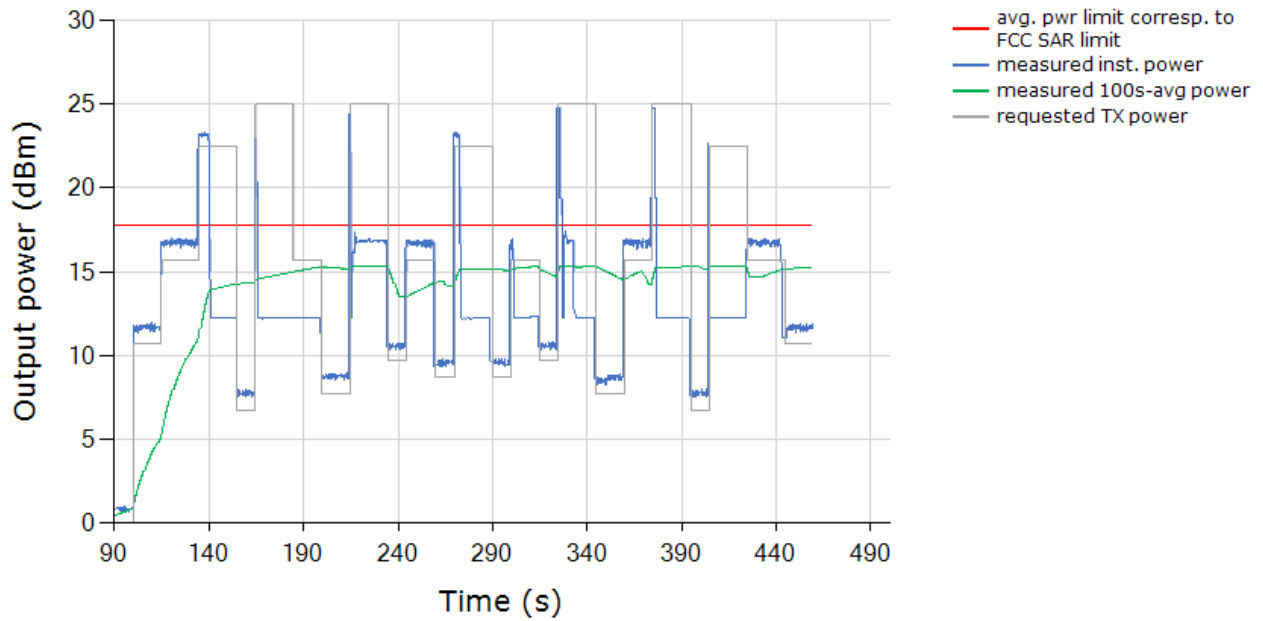


SAR
Tech: CDMA, Band CDMA 1900

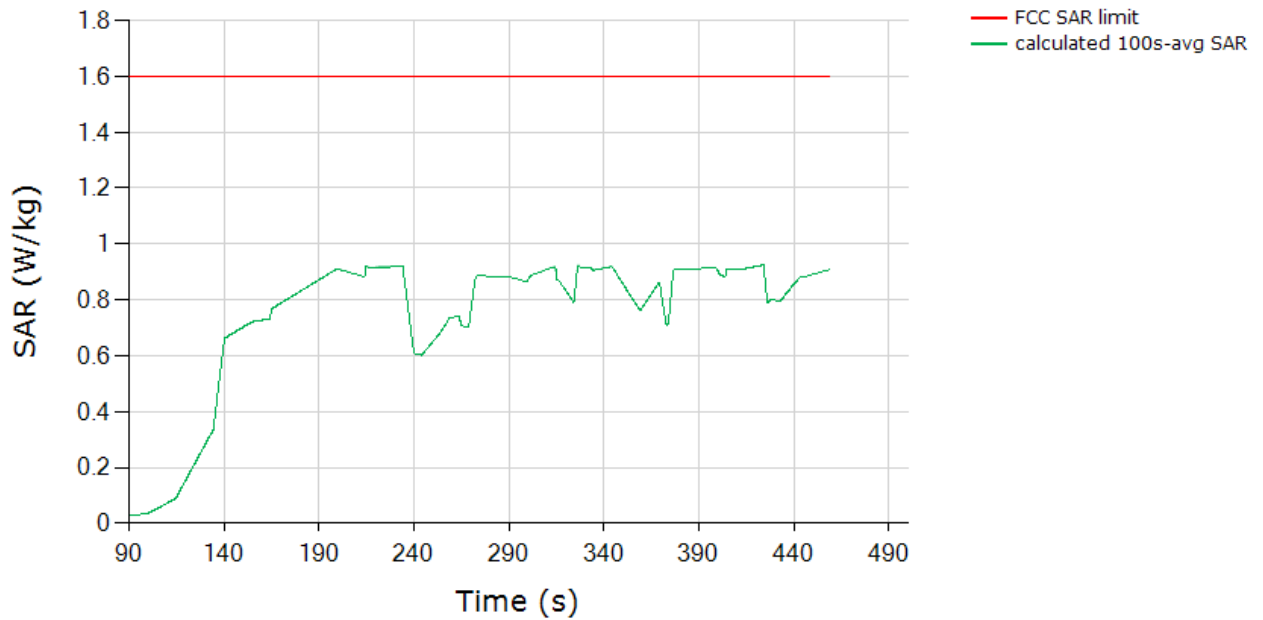


	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	0.925
Validated	

Conducted Power
Tech: CDMA, Band CDMA 1900

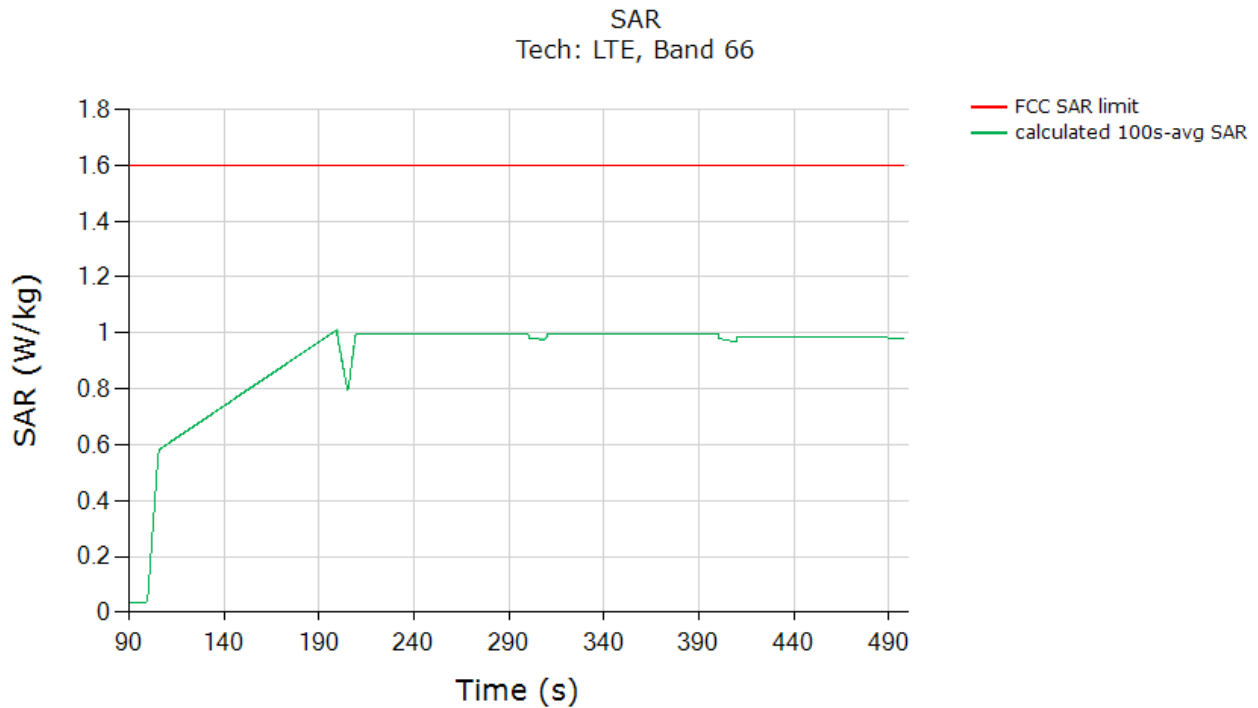
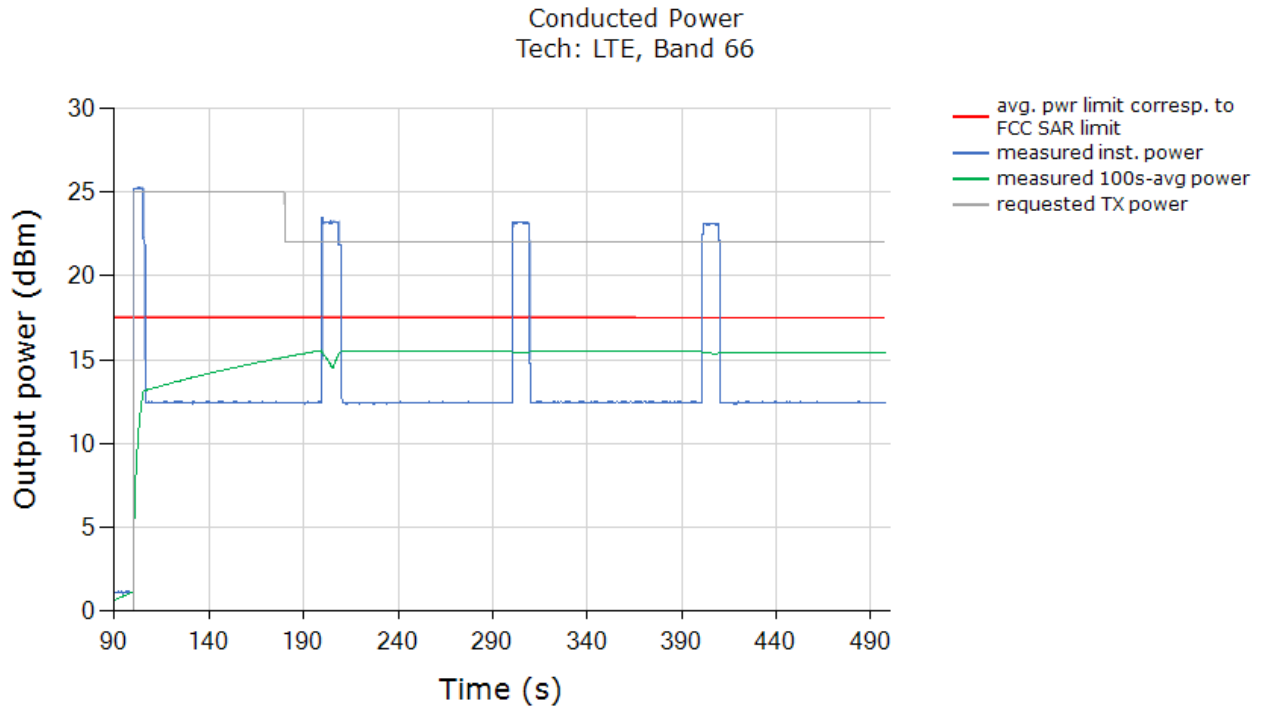


SAR
Tech: CDMA, Band CDMA 1900



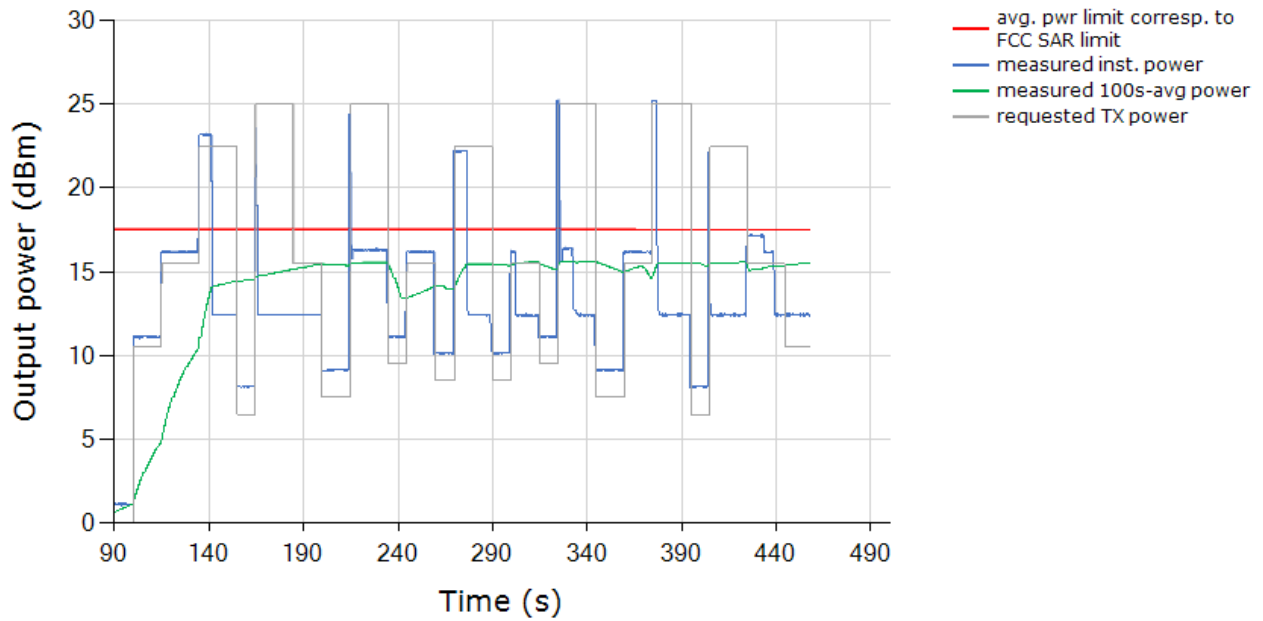
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	0.924
Validated	

5.3.4 LTE Band B66 Ant 1 (test case 7 in Table 4-2)

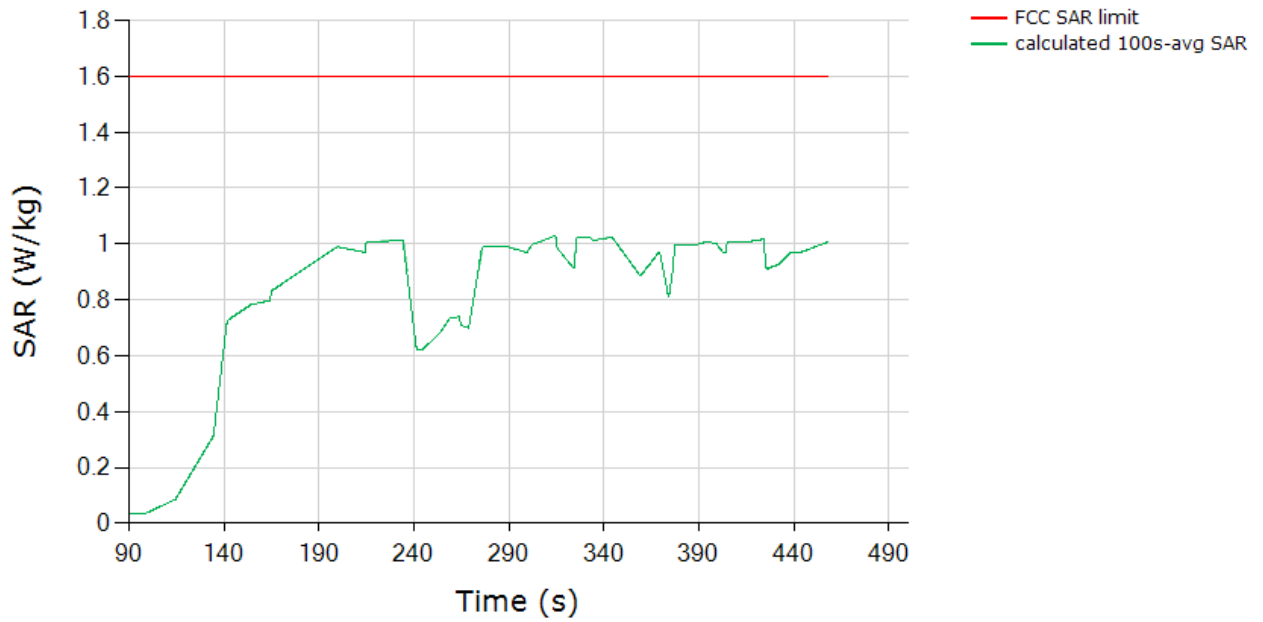


	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	1.011
Validated	

Conducted Power
Tech: LTE, Band 66



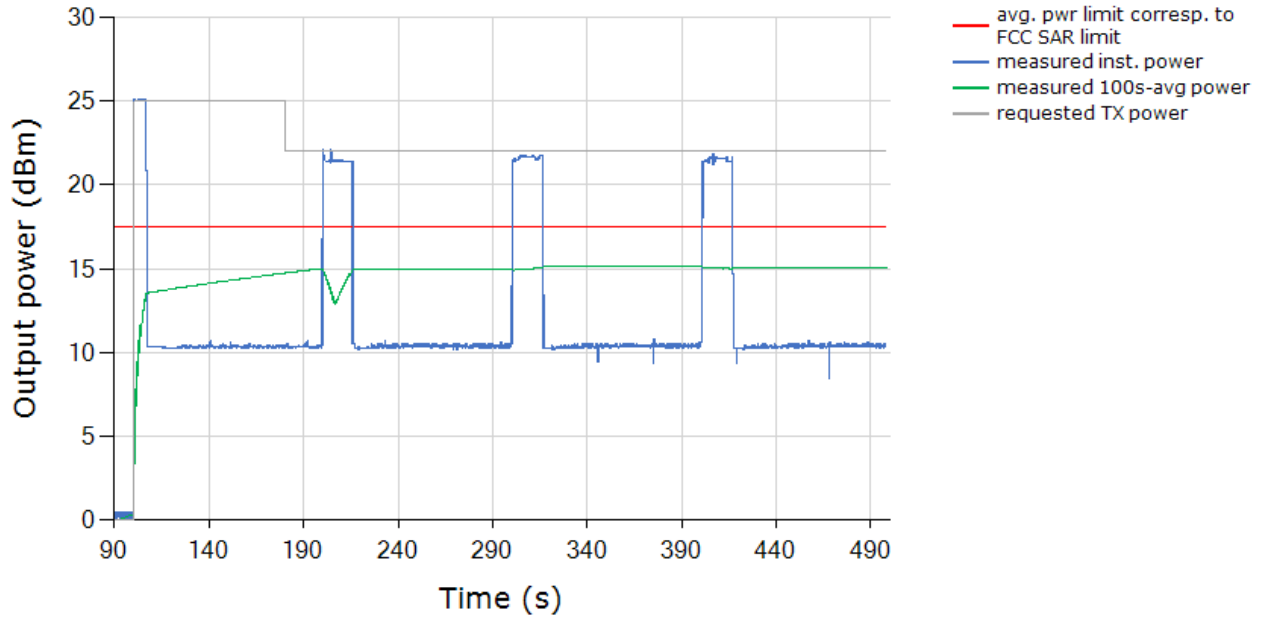
SAR
Tech: LTE, Band 66



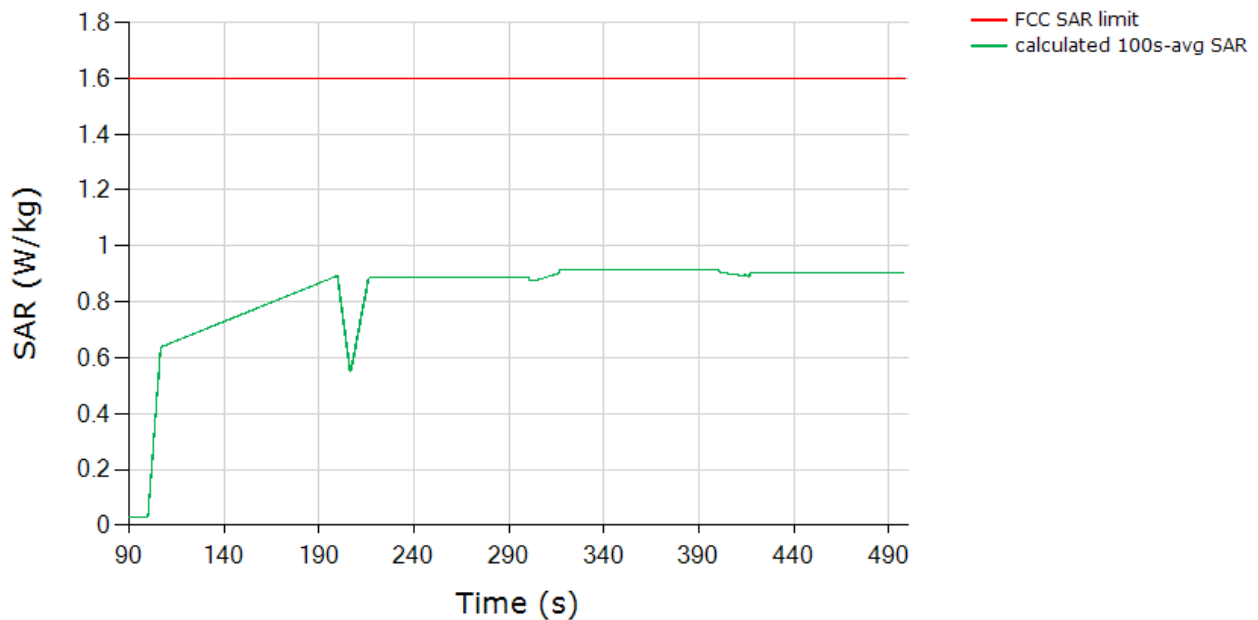
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	1.028
Validated	

5.3.5 Sub6 NR Band n66 Ant 1 (test case 9 in Table 4-2)

Conducted Power
Tech: NR5G SUB6, Band n66

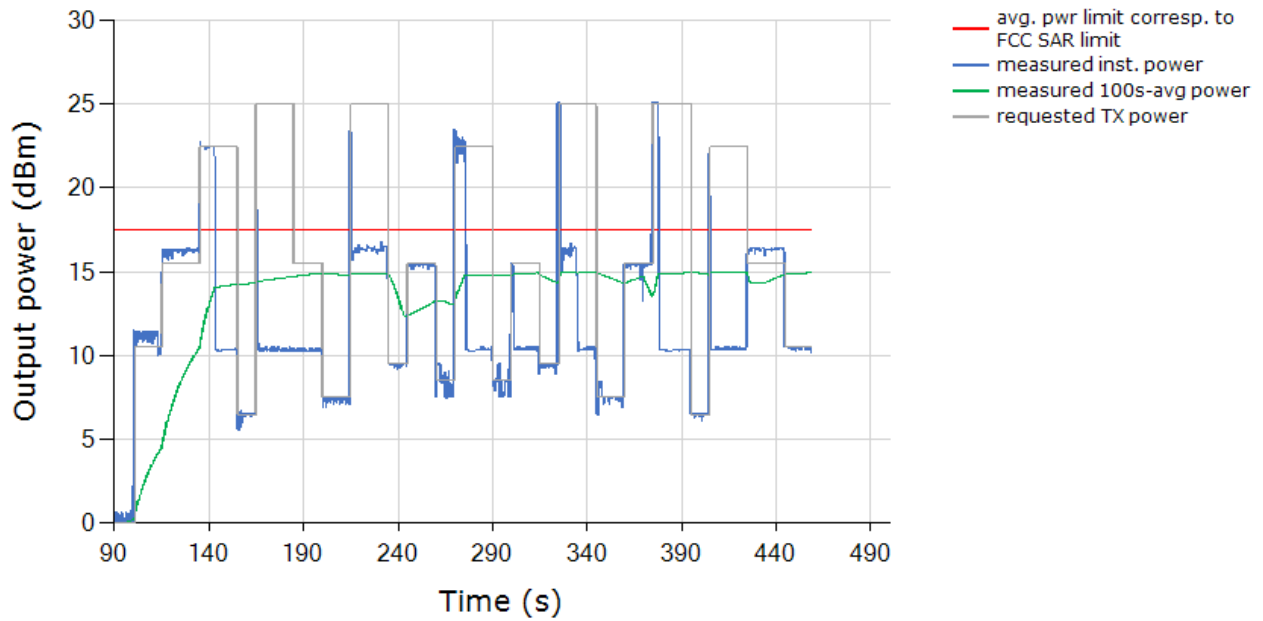


SAR
Tech: NR5G SUB6, Band n66

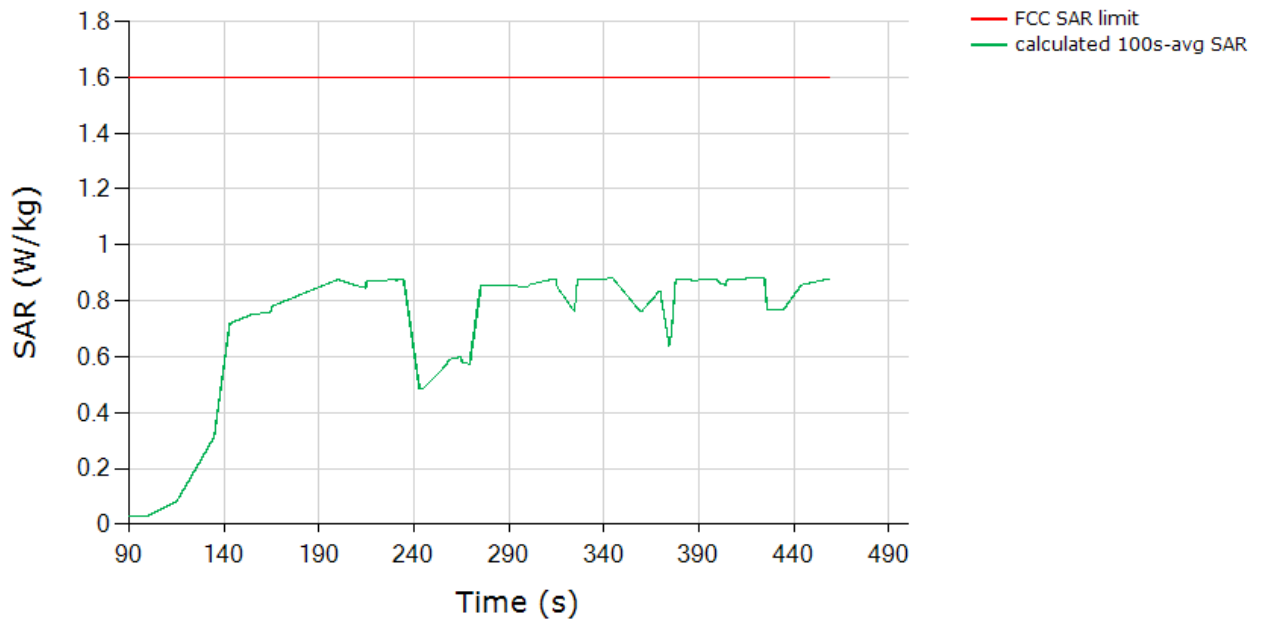


	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	.916
Validated	

Conducted Power
Tech: NR5G SUB6, Band n66



SAR
Tech: NR5G SUB6, Band n66



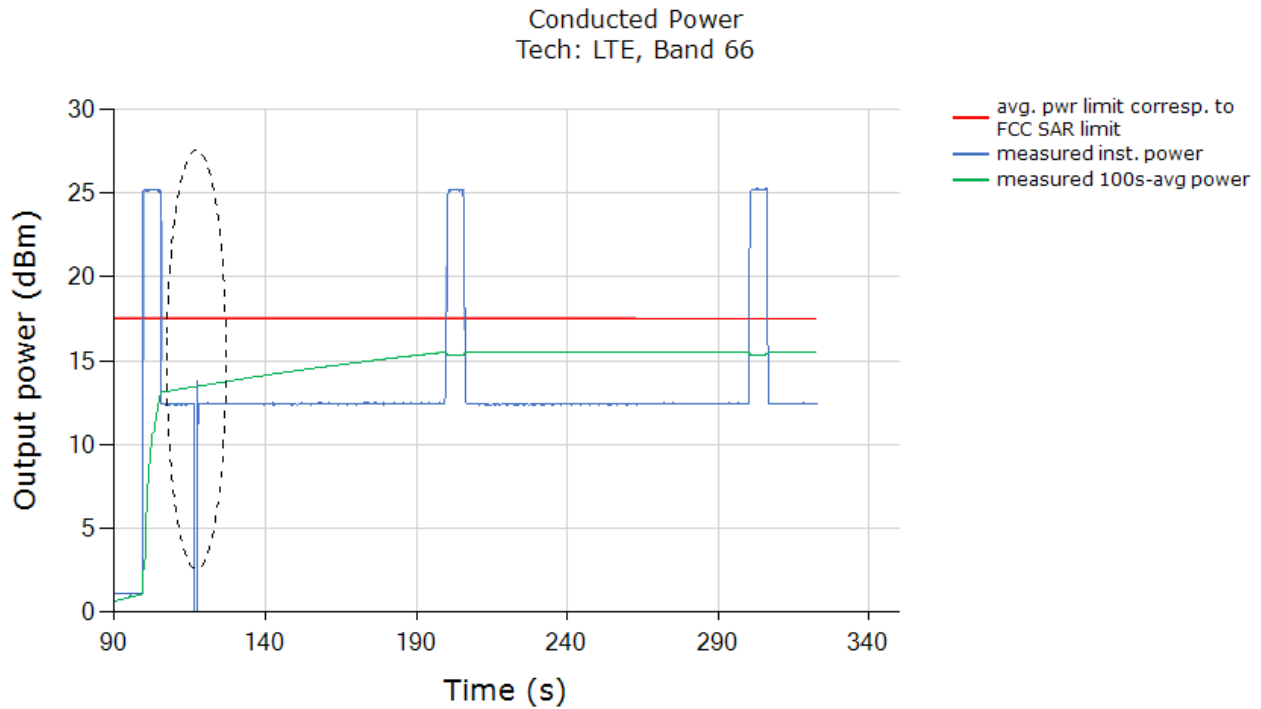
	(W/kg)
FCC 1gSAR limit	1.6
Max 100s-time averaged 1gSAR (green curve)	.884
Validated	

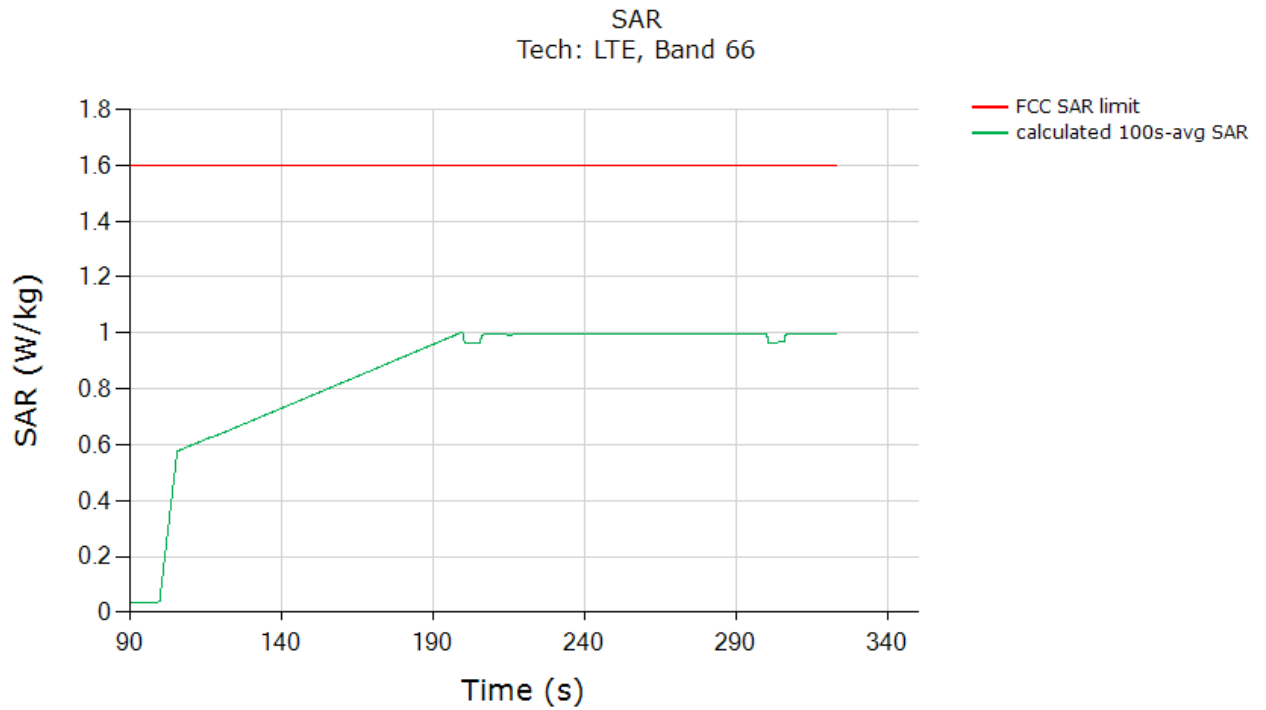
5.4 Change in Call Test Results (test case 11 in Table 4-2)

This test was measured with LTE 66, Antenna 1, DSI=1, and with callbox requesting maximum power. The call drop was manually performed when the EUT is transmitting at $P_{reserve}$ level as shown in the plot below (dotted black region). The measurement setup is shown in Figure 6-1(a) and (c). The detailed test procedure is described in Section 3.3.2.

Call drop test result:

Plot 1: Measured Tx power (dBm) versus time shows that the transmitting power kept the same $P_{reserve}$ level of LTE 66 after the call was re-established:





	(W/kg)
FCC 1gSAR limit	1.6
Max 60s-time averaged 1gSAR (green curve)	1.002
Validated	

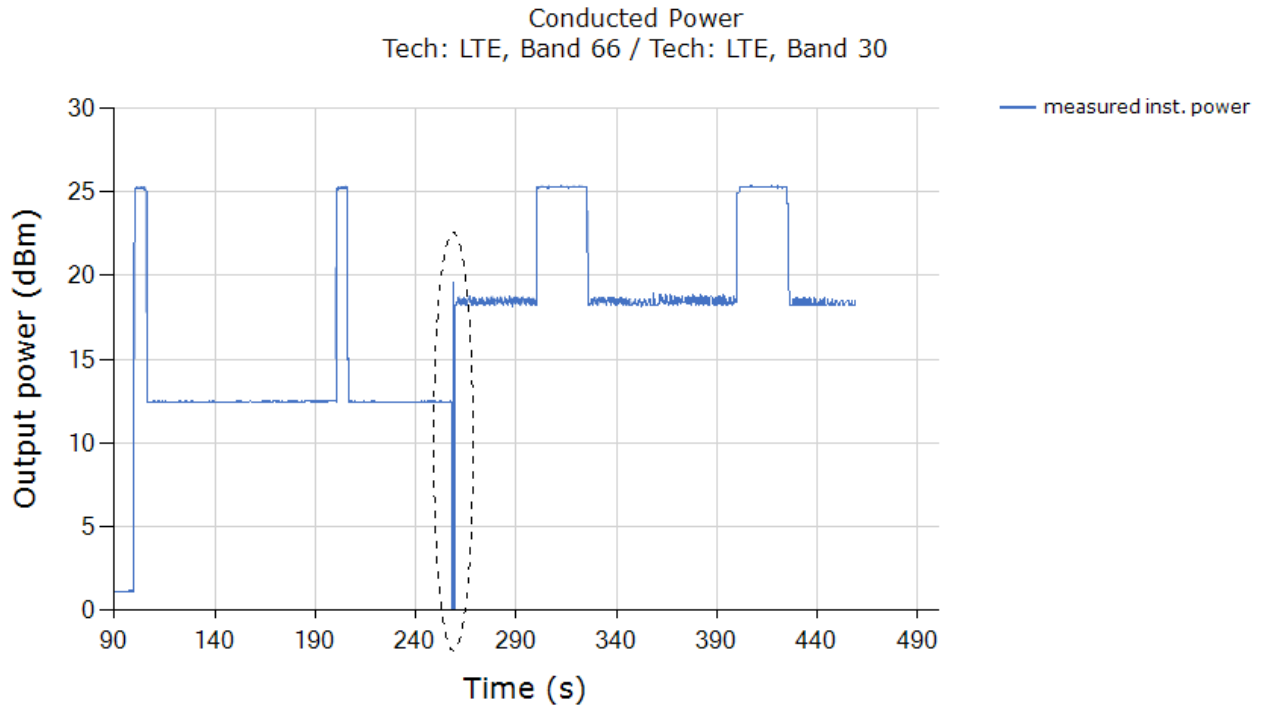
The test result validated the continuity of power limiting in call change scenario.

5.5 Change in technology/band test results (test case 12 in Table 4-2)

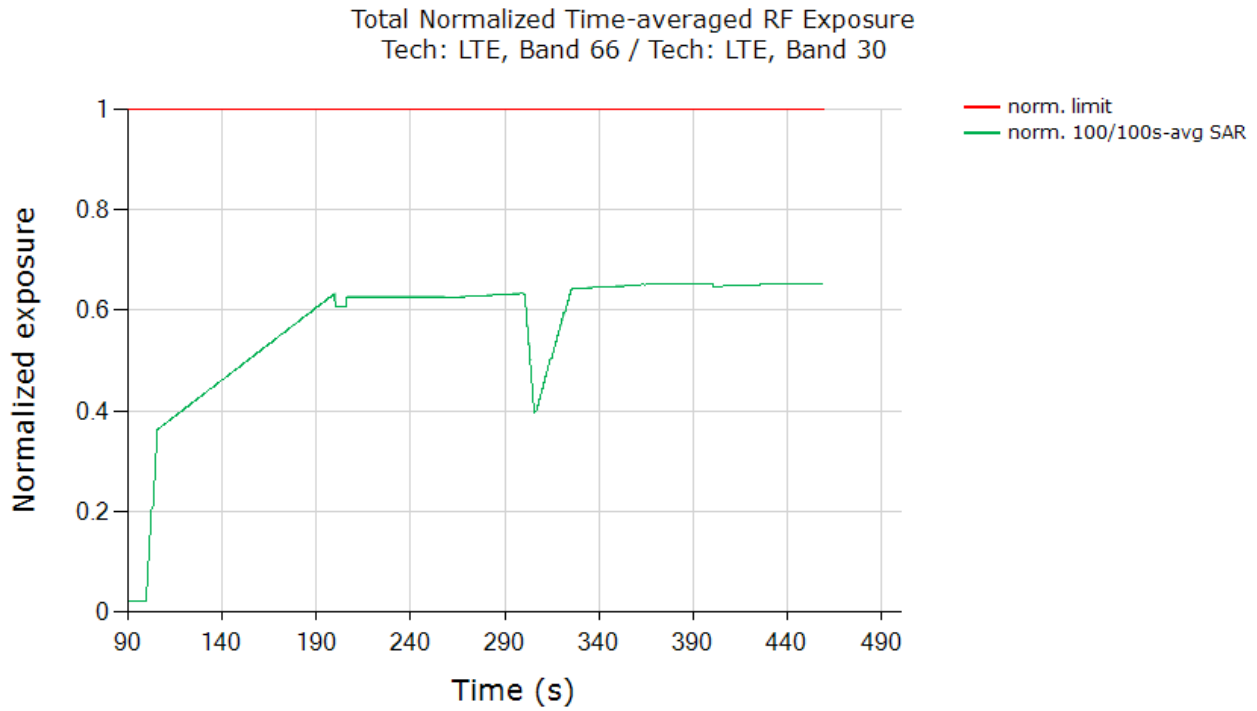
This test was conducted with callbox requesting maximum power, and with antenna & technology switch from LTE 66, Antenna 1, DSI = 1 to LTE 30, Antenna 1, DSI = 1. Following procedure detailed in Section 3.3.3, and using the measurement setup shown in Figure 6-1(a) and (c), the technology/band switch was performed when the EUT is transmitting at $P_{reserve}$ level as shown in the plot below (dotted black region).

Test result for change in technology/band:

Plot 1: Measured Tx power (dBm) versus time shows that the transmitting power changed from LTE 66, Antenna 1, DSI =1 $P_{reserve}$ level to LTE 30, Antenna 1, DSI = 1 $P_{reserve}$ level (within 1dB device uncertainty):



Plot 2: All the time-averaged conducted Tx power measurement results were converted into time-averaged normalized SAR values using Equation (6a), (6b) and (6c), and plotted below to demonstrate that the time-averaged normalized SAR versus time does not exceed the normalized FCC limit of 1.0:



	(W/kg)
FCC normalized SAR limit	1.0
Max 100s-time averaged normalized SAR (green curve)	0.654
Validated	

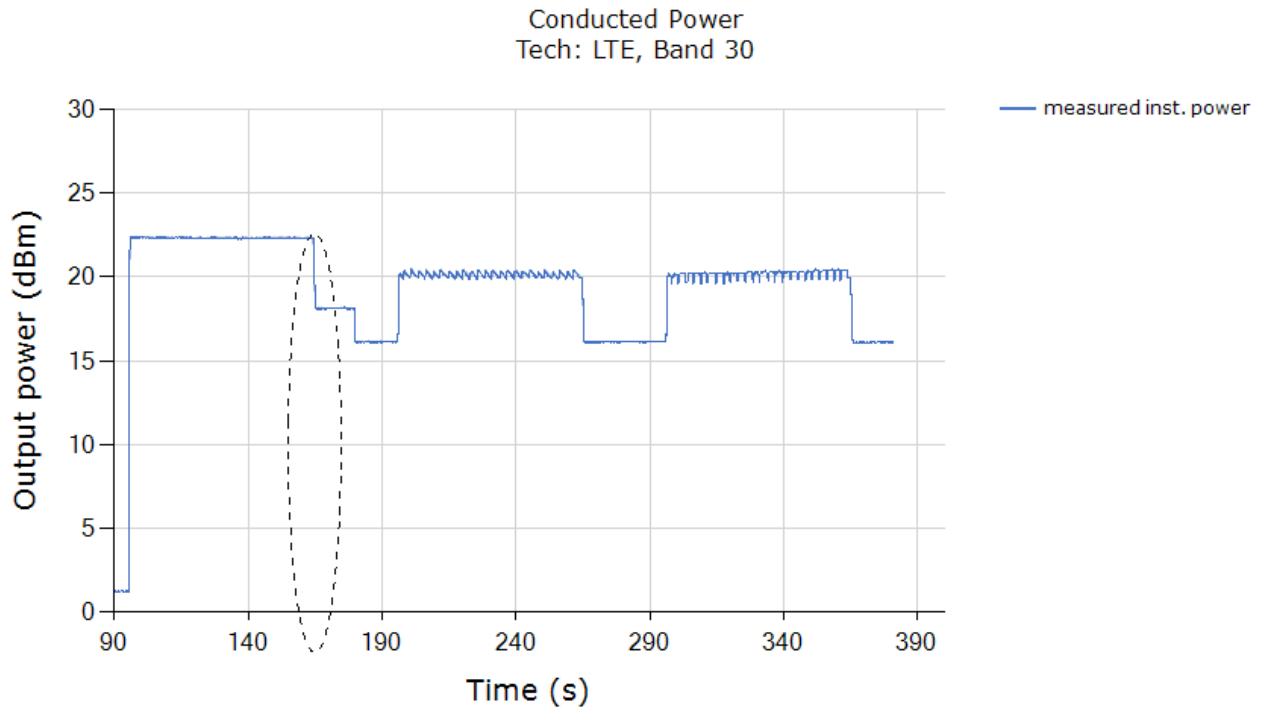
The test result validated the continuity of power limiting in technology/band switch scenario.

5.6 Change in DSI test results (test case 13 in Table 4-2)

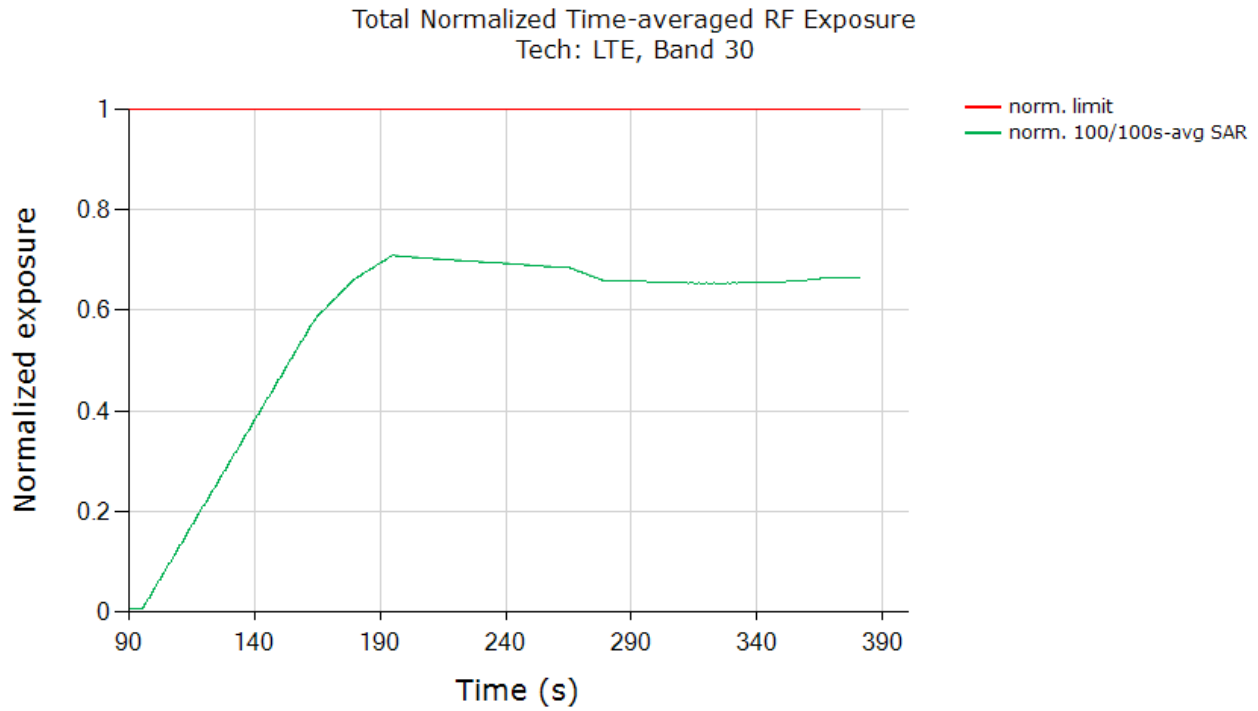
This test was conducted with callbox requesting maximum power, and with DSI switch from LTE 30 DSI = 1 to DSI = 0. Following procedure detailed in Section 3.3.5 using the measurement setup shown in Figure 6-1(a) and (c), the DSI switch was performed when the EUT is transmitting at $P_{reserve}$ level as shown in the plot below (dotted black circle).

Test result for change in DSI:

Plot 1: Measured Tx power (dBm) versus time shows that the transmitting power changed when DSI = 1 switches to DSI = 0:



Plot 2: All the time-averaged conducted Tx power measurement results were converted into time-averaged normalized SAR values using Equation (6a), (6b) and (6c), and plotted below to demonstrate that the time-averaged normalized SAR versus time does not exceed the FCC limit of 1 unit.



	(W/kg)
FCC normalized total exposure limit	1.0
Max 100s-time averaged normalized SAR (green curve)	0.711
Validated	

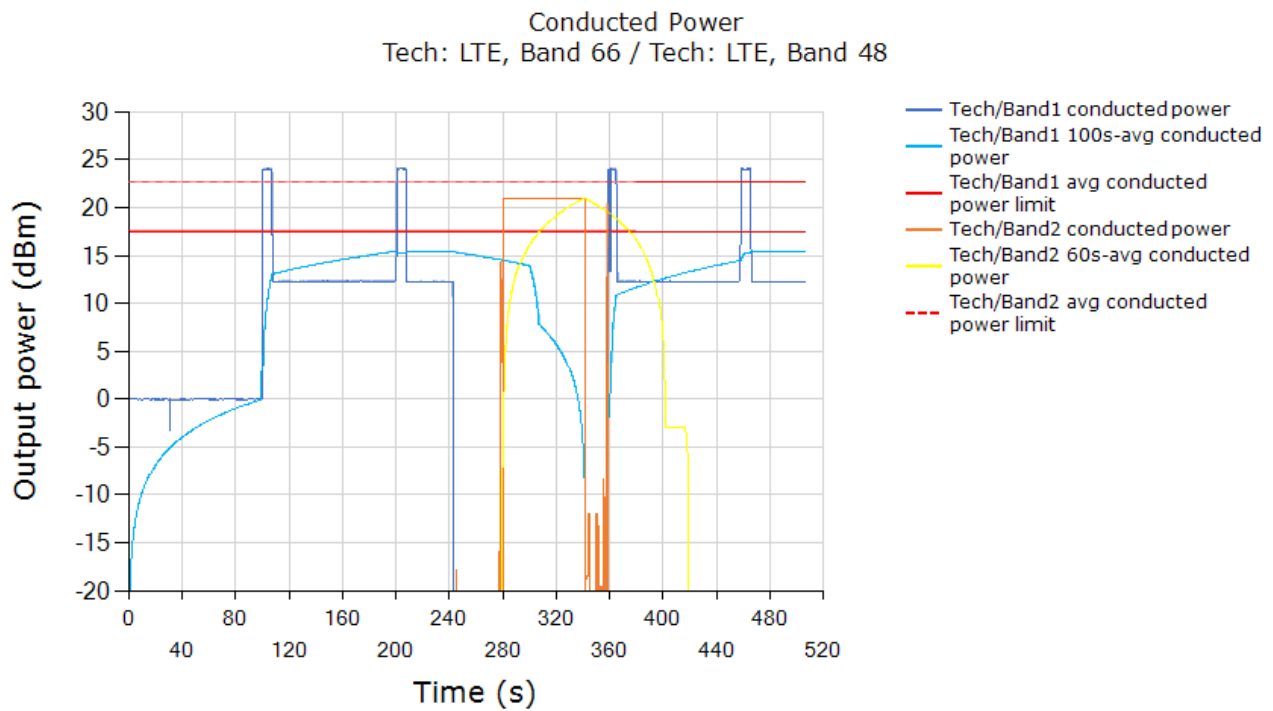
The above test result validated the continuity of power limiting in DSI switch scenario.

5.7 Change in Time Window/Antenna test results (test case 14 in Table 4-2)

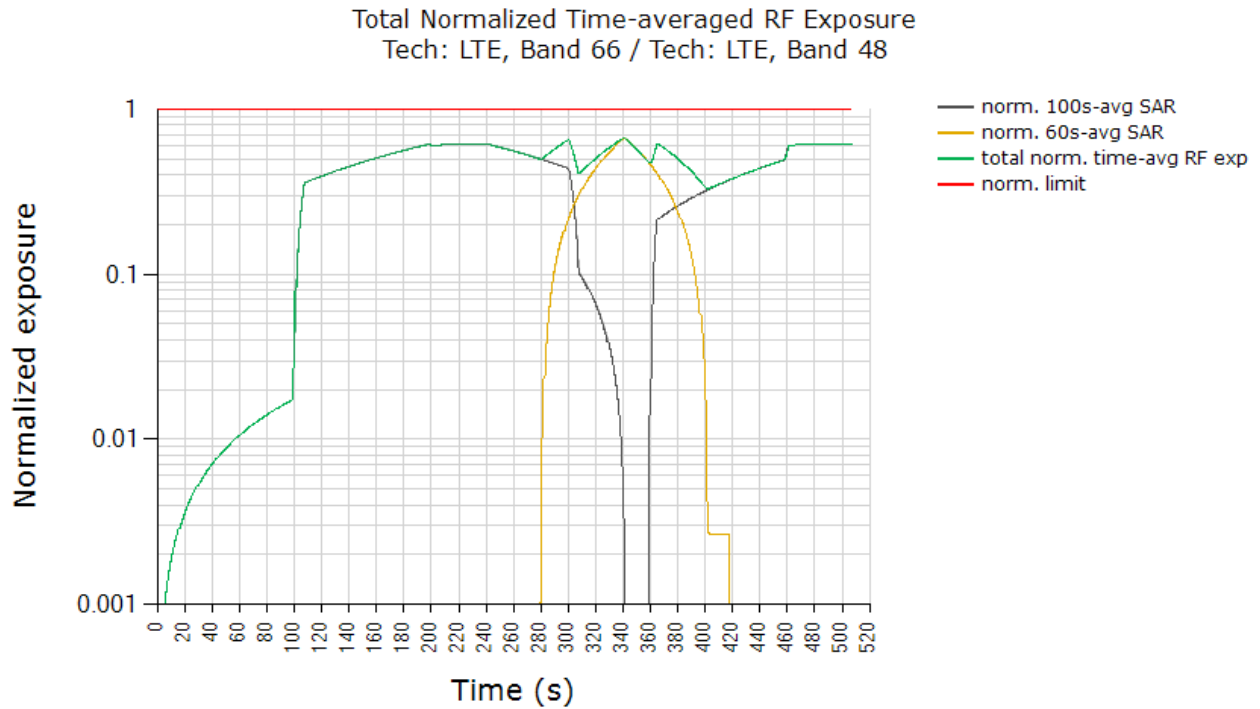
This test was conducted with callbox requesting maximum power, and with time-window/antenna switch between LTE 66, Antenna 1, DSI = 1 (100s window) and LTE 48, Antenna 7, DSI = 1 (60s window). Following procedure detailed in Section 3.3.6, and using the measurement setup shown in Figure 6-1(b) and (d), the time-window switch via tech/band/antenna switch was performed when the EUT is transmitting at $P_{reserve}$ level.

Test result for change in time-window (from 100s to 60s to 100s):

Plot 1: Measured Tx power (dBm) versus time shows that the transmitting power changed when LTE 66 switches to LTE 48 and switches back to LTE 66:



Plot 2: All the conducted Tx power measurement results were converted into time-averaged normalized SAR values using Equation (7a), (7b) and (7c), and plotted below to demonstrate that the time-averaged normalized SAR versus time does not exceed the FCC limit of 1 unit. Equation (7a) is used to convert the Tx power of device to obtain 100s-averaged normalized SAR in LTE 66 as shown in black curve. Similarly, equation (7b) is used to obtain 60s-averaged normalized SAR in LTE 48 as shown in orange curve. Equation (7c) is used to obtain total time-averaged normalized SAR as shown in green curve (i.e., sum of black and orange curves).



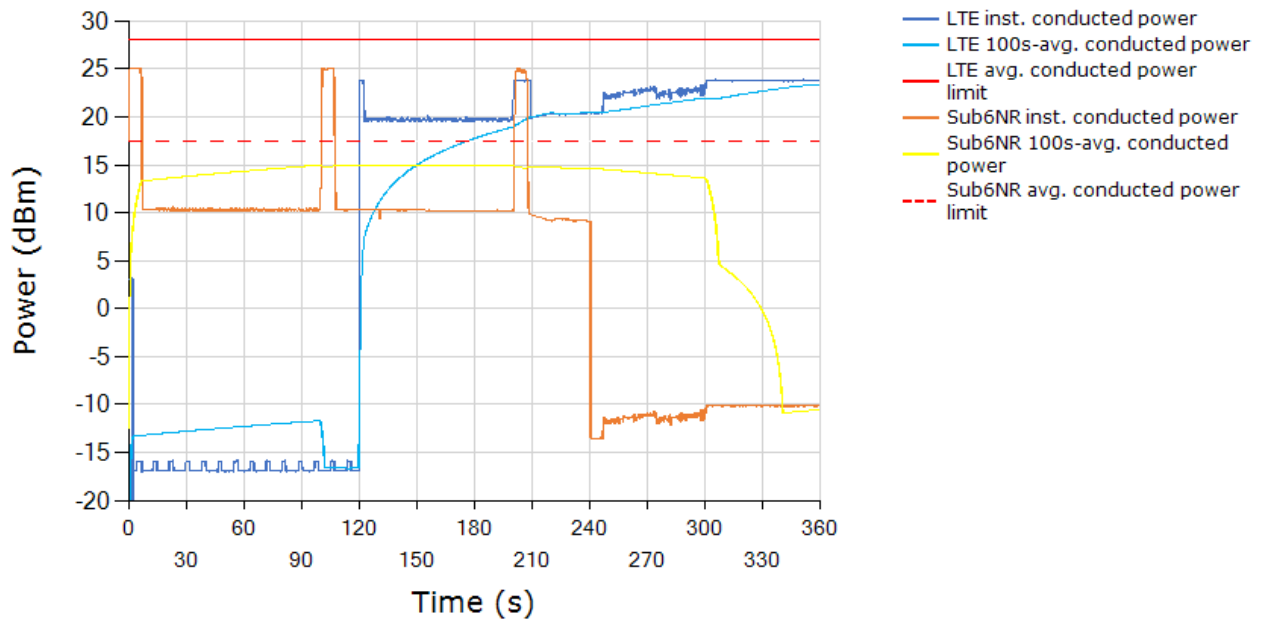
	(W/kg)
FCC normalized total exposure limit	1.0
Max time averaged normalized SAR (green curve)	0.668
Validated	

The above test result validated the continuity of power limiting in time-window switch scenario.

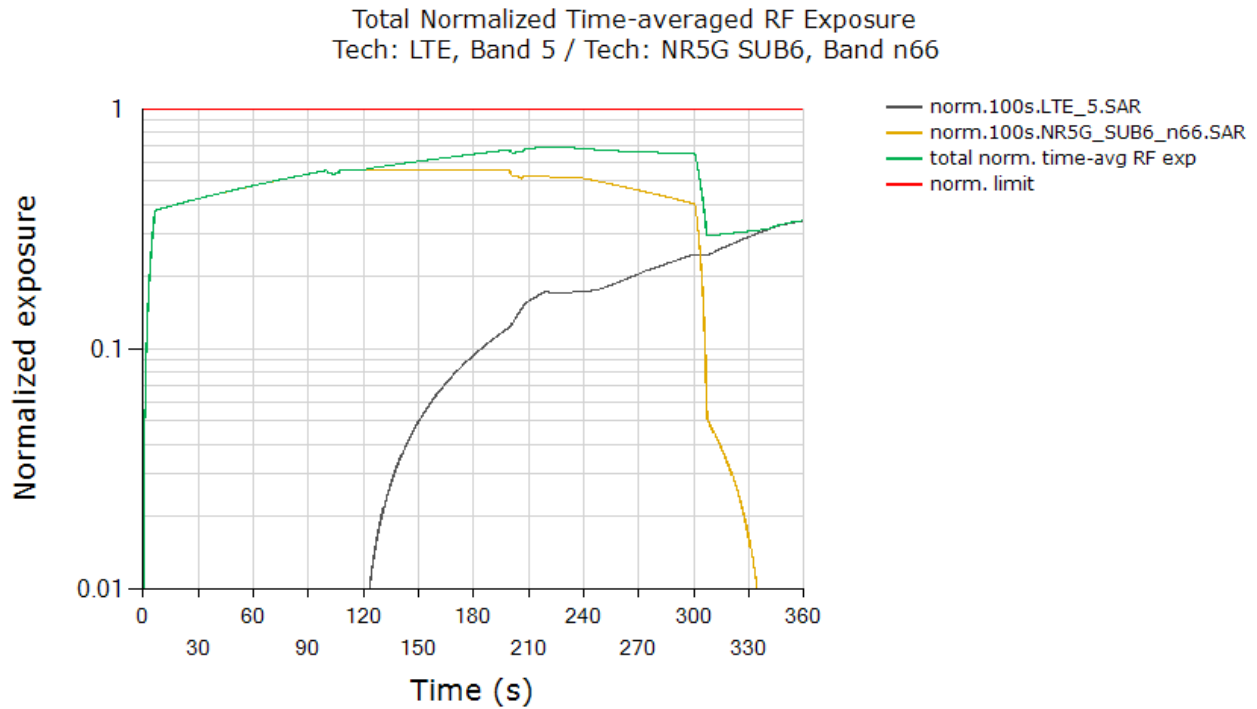
5.8 Switch in SAR exposure test results LTE B5 Ant 2 NR n66 Ant 1 (test case 15 in Table 4-2)

This test was conducted with callbox requesting maximum power, and with the EUT in LTE 5 + Sub6 NR Band 66 call. Following procedure detailed in Section 3.3.7 and Appendix B.2, and using the measurement setup shown in Figure 6-1(a) and (c) since LTE and Sub6 NR are sharing the same antenna port (otherwise, it should be Figure 6-1(b) and (d) for different antenna ports), the SAR exposure switch measurement is performed with the EUT in various SAR exposure scenarios, i.e., in SAR_{sub6NR} only scenario (t = 10s ~ 125s), SAR_{sub6NR} + SAR_{LTE} scenario (t = 125s ~ 235s) and SAR_{LTE} only scenario (t > 235s).

LTE and mmW Instantaneous and Time-averaged TX Power
 Tech: LTE, Band 5 / Tech: NR5G SUB6, Band n66



Plot 2: All the conducted Tx power measurement results were converted into time-averaged normalized SAR values using Equation (7a), (7b) and (7c), and plotted below to demonstrate that the time-averaged normalized SAR versus time does not exceed the FCC limit of 1 unit. Equation (7a) is used to convert the LTE Tx power of device to obtain 100s-averaged normalized SAR in LTE 5 as shown in black curve. Similarly, equation (7b) is used to obtain 100s-averaged normalized SAR in Sub6 NR n66 as shown in orange curve. Equation (7c) is used to obtain total time-averaged normalized SAR as shown in green curve (i.e., sum of black and orange curves).

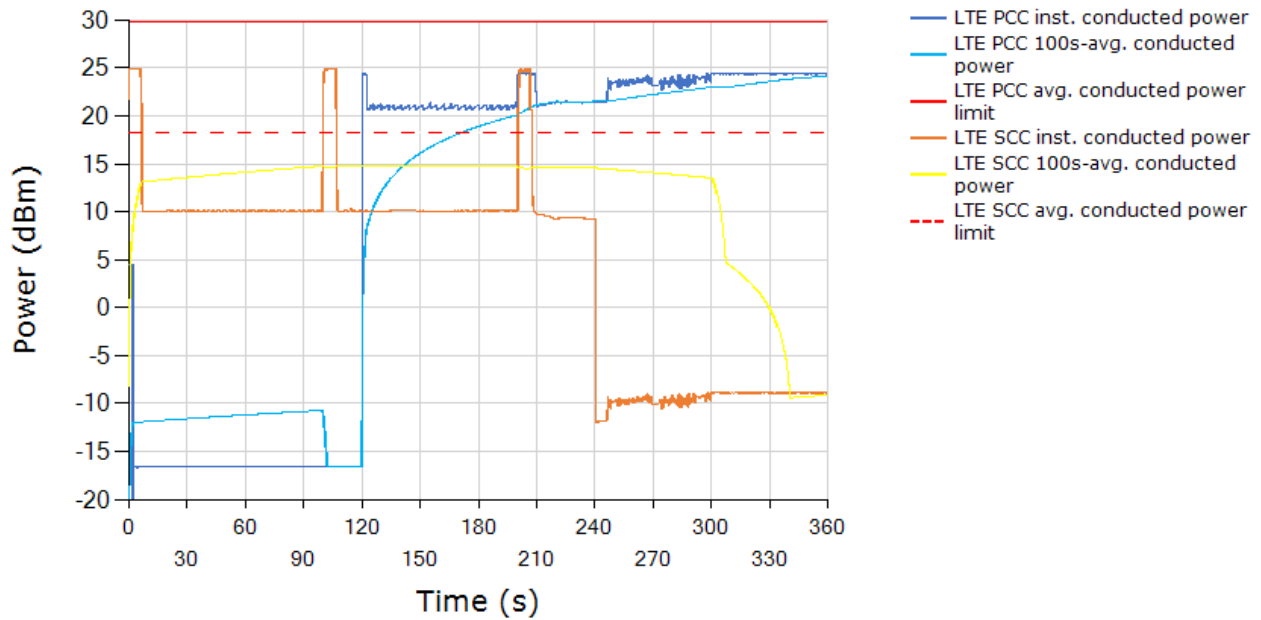


	(W/kg)
FCC normalized total exposure limit	1.0
Max time averaged normalized SAR (green curve)	0.743
Validated	

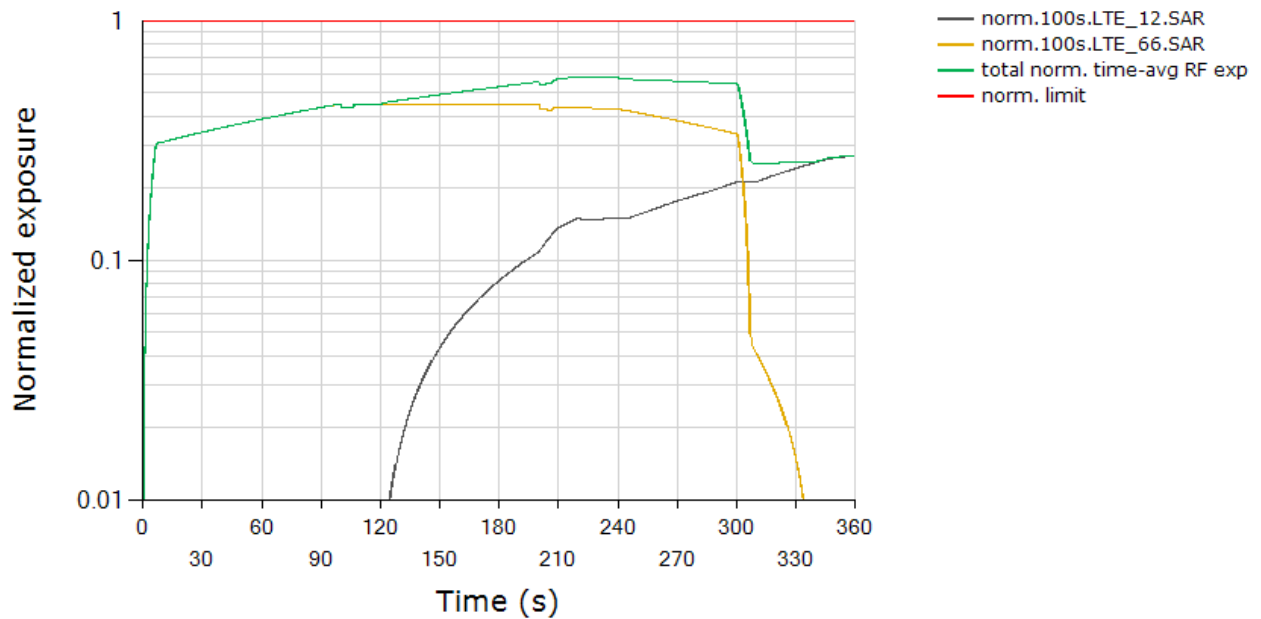
The above test result validated the continuity of power limiting in SAR exposure switch scenario.

5.9 Switch in SAR exposure test results LTE B66 Ant 1 B12 Ant 2 (test case 16 in Table 4-2)

LTE PCC/SCC Instantaneous and Time-averaged TX Power
Tech: LTE, Band 12 / Tech: LTE, Band 66



Total Normalized Time-averaged RF Exposure
Tech: LTE, Band 12 / Tech: LTE, Band 66



	(W/kg)
FCC normalized total exposure limit	1.0
Max time averaged normalized SAR (green curve)	0.584
Validated	

6 Conclusions

Qualcomm Smart Transmit feature employed in A2403, A2404, and A2405 has been validated through the conducted/radiated power measurement (as demonstrated in Chapter 5).

As demonstrated in this report, the power limiting enforcement is effective and the total normalized time-averaged RF exposure does not exceed 1.0 for all the transmission scenarios described in Section 2. Therefore, the EUT complies with FCC RF exposure requirement.

A Test Sequences

1. Test sequence is generated based on below parameters of the EUT:
 - a. Measured maximum power (P_{max})
 - b. Measured Tx_power_at_SAR_design_target (P_{limit})
 - c. Reserve_power_margin (dB)
 - $P_{reserve}$ (dBm) = measured P_{limit} (dBm) – Reserve_power_margin (dB)
 - d. SAR_time_window (100s for FCC)
2. Test Sequence 1 Waveform:

Based on the parameters above, the Test Sequence 1 is generated with one transition between high and low Tx powers. Here, high power = P_{max} ; low power = $P_{max}/2$, and the transition occurs after 80 seconds at high power P_{max} . As long as the power enforcement is taking into effective during one 100s/60s time window, the validation test with this defined test sequence 1 is valid, otherwise, select other radio configuration (band/DSI within the same technology group) having lower P_{limit} for this test. The Test sequence 1 waveform is shown below:

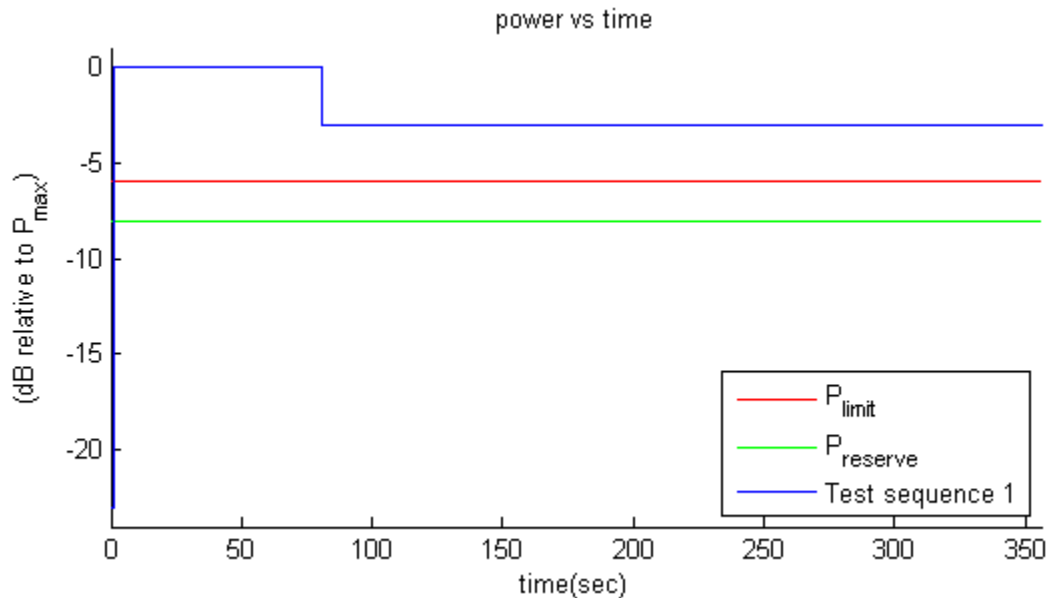


Figure A-1 Test sequence 1 waveform

3. Test Sequence 2 Waveform:
 Based on the parameters in A-1, the Test Sequence 2 is generated as described in Table 10-1, which contains two 170 second-long sequences (yellow and green highlighted rows) that are mirrored around the center row of 20s, resulting in a total duration of 360 seconds:

Table A-1: Test Sequence 2

Time duration (seconds)	dB relative to P_{limit} or $P_{reserve}$
15	$P_{reserve} - 2$
20	P_{limit}
20	$(P_{limit} + P_{max})/2$ averaged in mW and rounded to nearest 0.1 dB step
10	$P_{reserve} - 6$
20	P_{max}
15	P_{limit}
15	$P_{reserve} - 5$
20	P_{max}
10	$P_{reserve} - 3$
15	P_{limit}
10	$P_{reserve} - 4$
20	$(P_{limit} + P_{max})/2$ averaged in mW and rounded to nearest 0.1 dB step
10	$P_{reserve} - 4$
15	P_{limit}
10	$P_{reserve} - 3$
20	P_{max}
15	$P_{reserve} - 5$
15	P_{limit}
20	P_{max}
10	$P_{reserve} - 6$
20	$(P_{limit} + P_{max})/2$ averaged in mW and rounded to nearest 0.1 dB step
20	P_{limit}
15	$P_{reserve} - 2$

The Test Sequence 2 waveform is shown in Figure A-2.
 power vs time

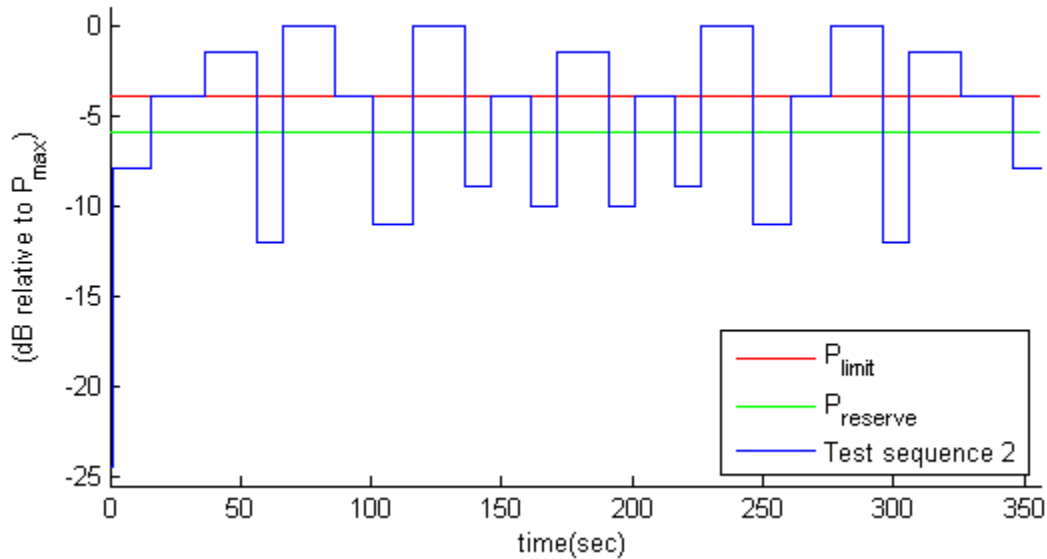


Figure A-2: Test Sequence 2 waveform

B Test Procedures for sub6 NR + LTE Radio

Appendix B provides the test procedures for validating Qualcomm Smart Transmit feature for LTE + Sub6 NR non-standalone (NSA) mode transmission scenario, where sub-6GHz LTE link acts as an anchor.

B.1 Time-varying Tx power test for sub6 NR in NSA mode

Follows Section 3.2.1 to select test configurations for time-varying test. This test is performed with two pre-defined test sequences (described in Section 3.1) applied to Sub6 NR (with LTE on all-down bits or low power for the entire test after establishing the LTE+Sub6 NR call with the callbox). Follow the test procedures described in Section 3.3.1 to demonstrate the effectiveness of power limiting enforcement and that the time averaged Tx power of Sub6 NR when converted into 1gSAR values does not exceed the regulatory limit at all times (see Eq. (1a) and (1b)). Sub6 NR response to test sequence1 and test sequence2 will be similar to other technologies (say, LTE), and are shown in Sections 6.3.7 and 6.3.8.

B.2 Switch in SAR exposure between LTE vs. Sub6 NR during transmission

This test is to demonstrate that Smart Transmit feature accurately accounts for switching in exposures among SAR for LTE radio only, SAR from both LTE radio and sub6 NR, and SAR from sub6 NR only scenarios, and ensures total time-averaged RF exposure compliance with FCC limit.

Test procedure:

1. Measure conducted Tx power corresponding to P_{limit} for LTE and sub6 NR in selected band. Test condition to measure conducted P_{limit} is:
 - Establish device in call with the callbox for LTE in desired band. 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.
 - Repeat above step to measure conducted Tx power corresponding to Sub6 NR P_{limit} . If testing LTE+Sub6 NR in non-standalone mode, then establish LTE+Sub6 NR call with callbox and request all down bits for radio1 LTE. In this scenario, with callbox requesting maximum power from Sub6 NR, measured conducted Tx power corresponds to radio2 P_{limit} (as radio1 LTE is at all-down bits)
2. Set *Reserve_power_margin* to actual (intended) value with EUT setup for LTE + Sub6 NR call. First, establish LTE connection in all-up bits with the callbox, and then Sub6 NR connection is added with callbox requesting UE to transmit at maximum power in Sub6 NR. As soon as the Sub6 NR connection is established, request all-down bits on LTE link (otherwise, Sub6 NR will not have sufficient RF exposure margin to sustain the call with LTE in all-up bits). Continue LTE (all-down bits)+Sub6 NR transmission for more than one time-window duration to test predominantly Sub6 NR SAR exposure scenario (as SAR exposure is negligible from all-down bits in LTE). After at least one time-window, request LTE to go all-up bits to test LTE SAR and Sub6 NR SAR exposure scenario. After at least one more time-window, drop (or request all-down bits) Sub6 NR transmission to test predominantly LTE SAR exposure scenario. Continue the test for at least one more time-window. Record the conducted Tx powers for both LTE and Sub6 NR for the entire duration of this test.

3. Once the measurement is done, extract instantaneous Tx power versus time for both LTE and Sub6 NR links. Similar to technology/band switch test in Section 3.3.3, convert the conducted Tx power for both these radios into 1gSAR value (see Eq. (6a) and (6b)) using corresponding technology/band P_{limit} measured in Step 1, and then perform 100s running average to determine time-averaged 1gSAR versus time as illustrated in Figure 3-1. Note that here it is assumed both radios have Tx frequencies < 3GHz, otherwise, 60s running average should be performed for radios having Tx frequency between 3GHz and 6GHz.
4. Make one plot containing: (a) instantaneous Tx power versus time measured in Step 2.
5. Make another plot containing: (a) instantaneous 1gSAR versus time determined in Step 3, (b) computed time-averaged 1gSAR versus time determined in Step 3, and (c) corresponding regulatory $1gSAR_{limit}$ of 1.6W/kg.

The validation criteria is, at all times, the time-averaged 1gSAR versus time shall not exceed the regulatory $1gSAR_{limit}$ of 1.6W/kg.