

APPENDIX E: MULTI-TX AND ANTENNA SAR CONSIDERATIONS

E.1 Introduction

The following procedures adopted from FCC KDB Publication 447498 D04v01 are applicable to devices with built-in unlicensed transmitters such as 802.11 and Bluetooth devices which may simultaneously transmit with the licensed transmitter

E.2 Simultaneous Transmission Procedures

This device contains transmitters that may operate simultaneously. Therefore, simultaneous transmission analysis is required. Per FCC KDB Publication 447498 D04v01 and IEEE 1528-2013 Section 6.3.4.1.2, simultaneous transmission SAR test exclusion may be applied when the sum of the 1g SAR for all the simultaneous transmitting antennas in a specific a physical test configuration is ≤ 1.6 W/kg. The different test positions in an exposure condition may be considered collectively to determine SAR test exclusion according to the sum of 1g or 10g SAR.

This device is enabled with Qualcomm® Smart Transmit Gen2 with pre-defined sub6 antenna groups (AG0 and AG1). Simultaneous transmission analysis is performed per antenna groups. Below analysis demonstrates the mutually exclusive operation of AG0 and AG1 and the compliance between AG0 and BT/WLAN/NFC/UWB, and between AG1 and BT/WLAN/NFC/UWB.

When operating in the same antenna group, Qualcomm Smart Transmit algorithm in WWAN directly adds the time-averaged RF exposure from 4G and time-averaged RF exposure from 5G NR. Smart Transmit algorithm controls the total RF exposure from both 4G and 5G NR to not exceed FCC limit. Therefore, simultaneous transmission compliance between 4G+5G operations within an antenna group is demonstrated in the Part 2 Report during algorithm validation.

The standalone reported SAR in the original filing was used to determine simultaneous transmission compliance as it is more conservative. Please see the original filing for complete evaluation of simultaneous transmission analysis.

E.3 Sub6 Antenna Groups

The 2nd generation of Smart Transmit (GEN2) operates based on pre-defined sub6 antenna groups (AG) and mmW module groups (MG). Sub6 Tx antennas in the device are grouped based on spatial variation of RF exposure distributions, where the RF exposure of one AG is mutually exclusive from other AG. This is accomplished by demonstrating either of below conditions for all exposure scenarios:

- a) Sum of SAR of one antenna from each of the sub6 AGs and the RF exposure from radios outside Smart Transmit is less than regulatory limits. This condition must be demonstrated for all antenna combinations of sub6 AGs.

(or)

- b) Every antenna from each sub6 AG meets SPLSR criteria (Section 4.3.2(c) in FCC KDB 447498 D04) with every antenna from another sub6 AG. This criteria must be demonstrated for all antenna combinations for each pair of AGs.

This device supports two sub6 AG: AG0 and AG1, with AG0 having 4 antennas (A, B, C, D) and AG1 having 3 antennas (E, F, I), and two WIFI/BT antennas outside of Smart Transmit. The conditions are verified through the following criteria:

- i) (SAR1 + SAR2 criteria): If SPLSR criteria is not used, then the highest reported SAR at P_{limit} (or P_{max} when $P_{limit} > P_{max}$) for each antenna should be obtained out of all supported technologies and frequency bands for each DSI. Demonstrate that the sum of reported SAR of one antenna from

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each of the sub6 AGs and the sum of RF exposure from all supported radios outside of Smart Transmit should be less than the regulatory limit as given below for each DSI.

1. Obtain the worst-case reported SAR for each antenna group (i.e., maximum *reported* SAR at P_{limit} (or P_{max} when $P_{limit} > P_{max}$) out of all supported technologies, frequency bands and antennas in AG0 and AG1), denoted as max.SAR.AG0 and max.SAR.AG1, and obtain the worst-case RF exposure for each external radio, and demonstrate that the sum of these RF exposures meets: $\{ [\text{max.SAR.AG0} + \text{max.SAR.AG1}] + \text{WIFI/BT Ant 1} + \text{WIFI/BT Ant 2} \} \leq 1.6$ (for 1g, or 4.0 for 10g).

ii) (SPLSR criteria): For each antenna, obtain the highest reported SAR value at P_{limit} out of all supported technologies for each frequency band. Using these values, demonstrate for a given DSI that every antenna from one sub6 AG meets SPLSR criteria with every antenna in another sub6 AG for all frequency bands. This criteria must be demonstrated for all antenna pair combinations irrespective of supported simultaneous transmission scenarios as given below for each DSI:

- SPLSR criteria should be met for all antenna pair combinations of AG0 and AG1: {antenna (A, B, C, D) in AG0; antenna (E, F, I) in AG1. As it can be seen, these include all combinations of antenna groups, antennas, and frequency bands.

iii) (combination of SPLSR & SAR1+SAR2 criteria): If SPLSR criteria for all the combinations of sub6 antenna groups in (i) is demonstrated to show that each AG is mutually exclusive from other AGs, and if the WIFI/BT antennas supported outside of Smart Transmit do not meet SPLSR criteria, then the condition in (ii) reduces to: $\{ \text{max.SAR.AG0} + \text{WIFI/BT Ant 1} + \text{WIFI/BT Ant 2} \} \leq 1.6$ and $\{ \text{max.SAR.AG1} + \text{WIFI/BT Ant 1} + \text{WIFI/BT Ant 2} \} \leq 1.6$ for compliance demonstration (for 1g, or 4.0 for 10g).

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If SPLSR criteria evaluation and analysis is needed to determine compliance for a certain DSI configuration, SPLSR is performed by taking the highest reported SAR for each of the supported technologies and bands per antenna, along with the peak SAR locations. Per Qualcomm guidance, only Y-axis coordinates are recorded in the analysis for calculation simplicity (assumes all 0mm of separation on the x-axis). Peak locations are documented in the Highest Report SAR and Hotspot Location Section below for each DSI configuration.

For this device, AG0 is located at the bottom of the device and is identified in this report as the “bottom set”. Per April 2022 TCB Workshop Notes, AG1 and the BT/WIFI antennas are located at the top of the device and were summed together as the “top set” for hybrid SPLSR calculation. The minimum distance when considering all transmissions between the top set and bottom set groups was considered when calculating the SPLSR. The SAR of the transmissions within each set is less than 1.6 W/kg (for 1g, and 4.0W/kg for 10g). (for ex: SAR for AG0 < 1.6W/kg (for 1g, 4.0 W/kg for 10g) for bottom set, and SAR for AG1+BT/WIFI < 1.6 W/kg (for 1g, 4.0 W/kg for 10g) for top set).

For bottom set (AG0), Y_max coordinate represents the worst case hotspot location that is closest to the top set (AG1 + BT/WIFI Antennas). Similarly, for top set (AG1 + BT/WIFI Antennas), Y_min coordinate represents the worst case hotspot location that is closest to the bottom set (AG0).

The following formula is used to calculate the SPLSR between Top Set and Bottom Set for each exposure configuration:

$$SPLSR = \frac{(Max\ SAR\ Top\ Set + Max\ SAR\ Bottom\ Set)^{1.5}}{|Y_{max} - Y_{min}|}$$

E.4 Conclusion

The above numerical summed SAR results and SPLSR for all the combinations of sub6 antenna groups are sufficient to show that AG0 is mutually exclusive from AG1 and that simultaneous transmission cases will not exceed the SAR limit and therefore no measured volumetric simultaneous SAR summation is required per FCC KDB Publication 447498 D04v01 and IEEE 1528- 2013 Section 6.3.4.1.

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