

According to KDB 447498 and KDB 616217

3) Transmitters and modules for use in portable exposure conditions that allow simultaneous transmission

- a) Except during network hand-offs where the maximum hand-off duration is less than 30 seconds, simultaneous transmission applies when there is overlapping transmission. SAR is evaluated for simultaneous transmission using volume scan measurements.
- b) SAR is not required for the following simultaneous transmission conditions
 - i) When excluded by the procedures in KDB 616217 or KDB 648474.
 - ii) When specific requirements for simultaneous transmission SAR evaluation have not been established for the host platform or device configuration:
 - (1) for the antennas that are located < 5 cm from persons, where
 - (a) The closest antenna separation distance is ≥ 5 cm for all simultaneous transmitting antennas within the host or device; and
 - (b) The sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas that require stand-alone SAR evaluation or the SAR to peak location separation ratios are < 0.3 for all simultaneous transmitting antenna pairs; and
 - (c) The output power is $\leq 60/f(\text{GHz})$ mW for any simultaneous transmitting antenna(s) for which stand-alone SAR evaluation is not required.
 - (2) for the antennas that are located ≥ 5 cm from persons, contact the FCC Laboratory to determine if the simultaneous transmission SAR exclusion procedures for Laptop/notebook/netbook computers in KDB 616217 and its supplement may be applied.

Table 2 – Summary of SAR Evaluation Requirements

| Antenna Output Power (mW) | $\leq 60/f_{(\text{GHz})}$ | $> 60/f_{(\text{GHz})}$ |
|------------------------------------|---|---|
| Individual Transmitter or Antenna | SAR not required | Antenna-to-user distance – $\geq (5 + \frac{1}{2}n)$ cm: test SAR on highest output channel only $< (5 + \frac{1}{2}n)$ cm: test SAR according to normal procedures |
| Simultaneous Transmitting Antennas | SAR not required: antenna-to-antenna or antenna-to-person distance ≥ 5 cm | SAR not required: antenna-to-antenna $\geq (5 + \frac{1}{2}n_x + \frac{1}{2}n_y)$ and antenna-to-person $\geq (5 + \frac{1}{2}n_x)$ cm |
| | SAR not required: when $\sum (SAR_{1g}) < \text{SAR limit}$, antenna-to-antenna distances > 5 cm and antenna-to-user distance > 5 cm if output $> 60/f$ | |
| | otherwise, test antenna(s) using highest SAR configuration for the individual transmitter/antenna | |

The EUT have WiFi transmitter and Bluetooth transmitter, and allow simultaneous transmission.
 $60/f(\text{GHz}) = 24.5$ mW

The maximum output power of WiFi = $12.83 \text{ dBm} = 19.19 \text{ mW} < 60/f(\text{GHz})$

The maximum output power of Bluetooth = $1.87 \text{ dBm} = 1.54 \text{ mW} < 60/f(\text{GHz})$

And the antenna-to-antenna distance > 5 cm, antenna-to-person distance > 5 cm, the details please refer to EUT plots.

So the SAR evaluation is exempt.