

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 – $\geq (5 + \frac{1}{2} \cdot n)$ cm: test SAR on highest output channel only $< (5 + \frac{1}{2} \cdot n)$ 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: when $\sum (\text{SAR}_{1g}) < \text{SAR limit}$, 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	SAR not required: antenna-to-antenna $\geq (5 + \frac{1}{2} \cdot n_x + \frac{1}{2} \cdot n_y)$ and antenna-to-person $\geq (5 + \frac{1}{2} \cdot n_x)$ cm

The EUT have WiFi transmitter and Bluetooth transmitter, and allow simultaneous transmission.

$$60/f(\text{GHz}) = 24.5 \text{ mW}$$

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

The maximum output power of Bluetooth = 1.87 dBm = 1.54 mW $< 60/f$ (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.