

# ELEMENT MATERIALS TECHNOLOGY

(formerly PCTEST)  
7185 Oakland Mills Road, Columbia, MD 21046 USA  
Tel. +1.410.290.6652 / Fax +1.410.290.6654  
<http://www.element.com>



## COMPLIANCE SUMMARY REPORT

**Applicant Name:**  
Microsoft Corporation

One Microsoft Way  
Redmond, WA 98052 USA  
Microsoft Corporation

**Test Site/Location:**  
Element Washington DC LLC,  
Columbia, MD, USA

**Document Serial No.:**  
1M2311170118-02.C3K

**FCC ID:** C3K2085

**APPLICANT:** MICROSOFT CORPORATION

**Report Type:** Compliance Summary  
**DUT Type:** Portable Computing Device  
**Model:** 2085

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# 1 STRATEGY FOR COMPLIANCE DEMONSTRATION

## 1.1 RF Exposure Evaluation Strategy

The FCC RF exposure limits defined based on time-averaged RF exposure. The device under test (DUT) uses the Qualcomm FastConnect 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 via FastConnect TAS for WLAN operations. Additionally, this device supports BT/NFC technologies but the output power of these modems is not controlled by the TAS algorithm.

Demonstrating compliance of DUT enabled with Qualcomm FastConnect feature is completed in three parts:

### 0. RF Exposure Compliance Test Report Part 0: SAR Characterization

The SAR Characterization, denoted as SAR Char, determines the power limit that meets FCC exposure requirement after accounting for device design related uncertainties for each supported radio configuration and RF exposure usage scenario. The determined power limits will be loaded and stored in the EUT via the Board Data File (BDF), and then used as inputs for TAS to operate.

For WLAN SAR Char is derived from SAR test measurements and conducted power measurements to determine  $P_{Limit}$  for each technology/band. The  $P_{Limit}$  represents the maximum time-averaged power level for the corresponding radio/antenna configuration.

### 1. RF Exposure Compliance Test Report Part 1: Test in Static Transmission Condition

Part 1 demonstrates that DUT meets FCC SAR limits when transmitting at pre-determined maximum time-averaged power level:  $P_{Limit}$  for WLAN. The SAR measurement in Part 1 is under static transmission condition.

The compliance for BT radio is demonstrated at a fixed power level (fixed = maximum RF tune-up level or power-back off level).

The exposure from the simultaneous transmission of WLAN is evaluated in Part 2 report.

### 2. RF Exposure Compliance Test Report Part 2: Test in Dynamic Transmission Condition

Part 2 demonstrates compliance in Tx varying transmission conditions and validates Qualcomm FastConnect algorithm. The test results reported in Part 2 demonstrates that DUT complies with FCC RF exposure requirement under Tx varying transmission scenarios, thereby validity of Qualcomm FastConnect algorithm.

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## 1.2 Nomenclature

Applicable Technologies	Term	Description
WLAN	$P_{Limit}$	Power level that corresponds to the exposure design target ( $SAR_{design\_target}$ ) after accounting for all device design related uncertainties
	$P_{Max}$	Maximum tune up output power
	$T_{SAR}$	Defined time averaging window for $f < 6$ GHz
	$SAR_{design\_target}$	Target SAR level resulting in maximum time-averaged exposure optimized from total uncertainty
	$SAR_{Char}$	Table containing $P_{Limit}$ for all technologies
WLAN	<i>regulatory body</i>	Regulatory body that the algorithm is designed to comply. Algorithm's time averaging window is dependent on either FCC or ICNIRP requirements.
	<i>Reserve margin</i>	Margin below $P_{Limit}$ reserved for future transmission
	$P_{reserve}$	Minimum transmit power with a designated margin below $P_{Limit}$

## 1.3 Bibliography

Report Type	Report Serial Number
SAR Evaluation Report (Part 1)	1M2311170118-01.C3K
SAR Evaluation Report (Part 0)	1M2311170118-21.C3K
RF Exposure Part 2 Test Report	1M2311170118-22.C3K

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## 2 TIME AVERAGING ALGORITHM

### 2.1 Algorithm Description

The FCC RF exposure limit is defined based on time-averaged RF exposure. When running in a wireless device, Qualcomm FastConnect algorithm enables more elegant power control mechanisms for RF exposure management. It ensures at all times the wireless device is in compliance with the FCC limit of RF exposure time-averaged over a defined time window, denoted as  $T_{SAR}$  and  $T_{PD}$  for specific absorption rate (SAR for transmit frequency < 6 GHz) and power density (PD for transmit frequency > 6 GHz) time windows, respectively.

The Qualcomm FastConnect algorithm not only ensures the wireless device complies with RF exposure requirement, but also improves the user experience and network performance.

For a given wireless device, RF exposure is proportional to the transmitting power.

- Once the SAR of the wireless device is characterized at a transmit power level, RF exposure at a different power level for the characterized configurations can be scaled by the change in the corresponding power level.
- Therefore, for a characterized device, RF exposure compliance can be achieved through transmit power control and management.

The Qualcomm FastConnect algorithm embedded in Qualcomm modems reliably controls the transmit power of the wireless device in real time to maintain the time-averaged transmit power, in turn, time-averaged RF exposure, below the predefined time-averaged power limit for each characterized technology and band.

- This predefined time-averaged power limit is denoted as  $P_{Limit}$  corresponding SAR limit (frequency < 6 GHz) in this report.
- The wireless device continuously transmitting at  $P_{Limit}$  level complies with the FCC RF exposure requirement.

In a simultaneous transmission scenario, the algorithm manages all active transmitters and make sure the total exposure ratio from each transmitter not exceeding to 1.

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## 2.2 Basic concept of the algorithm

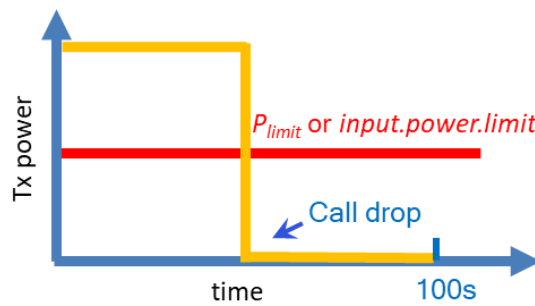
The Qualcomm FastConnect algorithm controls and manages the instantaneous transmit power (Tx) to maintain the time-averaged Tx power and therefore, time-averaged RF exposure in compliance with FCC limits.

- If time-averaged transmit power approaches  $P_{Limit}$ , then the modem needs to limit instantaneous transmit power to ensure the time-averaged transmit power does not exceed  $P_{Limit}$  in any  $T_{SAR}$  time windows since the time-averaged RF exposure is required to comply with the FCC RF exposure limit in any  $T_{SAR}$  time window.
- The wireless device can instantaneously transmit at high transmit powers and exceed the  $P_{Limit}$  level for a short duration before limiting the power to maintain the time-averaged transmit power under  $P_{Limit}$ .
- If the wireless device transmits at high power for a long time, then the radio link needs to be dropped to be compliant with time-averaged Tx power requirement (see Figure 2-1).
- To avoid dropping the radio link, TAS algorithm starts the power limiting enforcement earlier in time to back off the Tx power to a reserve level (denoted as  $P_{reserve}$ ), so the wireless device can maintain the radio link at a minimum reserve power level for as long as needed, and at the same time ensure the time-averaged Tx power over any defined time window is less than  $P_{Limit}$  at all times (see Figure 2-2). At all times, TAS meets the below equation:

$$time. avg. Tx power = \frac{1}{T_{SAR}} \int_{t-T_{SAR}}^t inst. Tx power(t) dt \leq P_{limit}$$

**Equation 2-1**

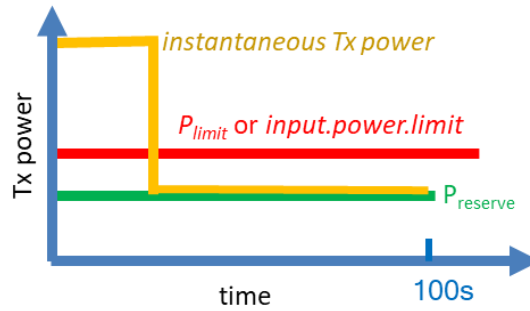
where, *time. avg. Tx power* is the transmit power averaged between  $t-T_{SAR}$  and  $t$  time period;  $T_{SAR}$  is the time window defined by FCC for time-averaging RF exposure for Tx frequency less than 6GHz (sub6); *inst. Tx power (t)* is the instantaneous transmit power at  $t$  time instant;  $P_{Limit}$  is the predefined time-averaged power limit.



(a)

**Figure 2-1**  
**Transmit at high power when needed and permitted**

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(b)

**Figure 2-2**

**Transmit with reserve power to support continuous transmission at a minimum power level ( $P_{reserve}$ )**

- In the case of simultaneous transmission, TAS manages all active transmitters and make sure the total exposure ratio is less than 1

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

**Equation 2-2**

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## 2.3 Configurable Parameters

The following input parameters are required for functionality of Qualcomm FastConnect TAS algorithm. These parameters cannot be accessed by the end user, because at the factory they are entered through the BDF entries by the OEM.

Input Parameter	Description
<i>regulatory body</i>	<ul style="list-style-type: none"> <li>Inputs of “0” and “1” corresponding to FCC and ICNIRP requirements for the averaging time windows.</li> <li>For FCC, algorithm uses an averaging window of 100 seconds for <math>f &lt; 3</math> GHz, 60 seconds for <math>3 \text{ GHz} &lt; f &lt; 6 \text{ GHz}</math>, and 4 seconds for <math>24 \text{ GHz} &lt; f &lt; 42 \text{ GHz}</math>.</li> </ul>
<i>Tx_power_at_SAR_design_target</i> ( $P_{Limit}$ in dBm) $f < 6 \text{ GHz}$	<p>The maximum time-averaged transmit power, in dBm, corresponding to the <i>SAR_design_target</i>.</p> <p><i>SAR_design_target</i> is pre-determined for this DUT and it is less than regulatory SAR limit after accounting for all design related tolerances. The time-averaged SAR is assessed against this <i>SAR_design_target</i> in real time to determine the compliance.</p> <p><math>P_{Limit}</math> could vary with technology, band and Device State Index (DSI) and therefore, it has the unique value for each technology, band and DSI.</p>
<i>Reserve margin</i> ( $P_{reserve}$ in dBm)	<p>The margin below <math>P_{Limit}</math> reserved for future transmission with a minimum transmit power <math>P_{reserve}</math></p> $P_{reserve} \text{ (dBm)} = P_{limit} \text{ (dBm)} - \text{Reserve margin (dB)}$ <p>When the <i>Reserve margin</i> is set to 0 dB, TAS effectively limits the upper bound of the transmit power to <math>P_{limit}</math> and the DUT transmits continuously at <math>P_{limit}</math> without utilizing TAS dynamic control feature.</p>

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### 3 DUT DESCRIPTION

#### 3.1 Device Overview

Band & Mode	Operating Modes	Tx Frequency
2.4 GHz WIFI	Data	2412 - 2472 MHz
5 GHz WIFI	Data	U-NII-1: 5180 - 5240 MHz U-NII-2A: 5260 - 5320 MHz U-NII-2C: 5500 - 5720 MHz U-NII-3: 5745 - 5825 MHz
6 GHz WIFI	Data	U-NII-5: 5935 - 6415 MHz U-NII-6: 6435 - 6515 MHz U-NII-7: 6535 - 6855 MHz U-NII-8: 6875 - 7115 MHz
2.4 GHz Bluetooth	Data	2402 - 2480 MHz
NFC	Data	13.56 MHz

This device uses the Qualcomm FastConnect 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 for WLAN operations. Additionally, this device supports BT/NFC technologies but the output power of these modems is not controlled by the FastConnect algorithm.

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## 4 COMPLIANCE SUMMARY

### 4.1 RF Exposure Compliance Summary

All transmission scenarios that the DUT supports comply with FCC time-averaged RF exposure requirements, as shown in Table 4-1.

**Table 4-1  
Reported RF Exposure Levels**

	RFx Evaluation	Power Level	FCC Limit	<i>Reported</i> RF Exposure Level	Test Report
<b>SAR (W/kg)</b>	Standalone 1g SAR	$P_{limit}$	1.6	0.79	FCC SAR Evaluation Report (Part 1)
	Simultaneous Tx 1g SAR	$P_{limit}$	1.6	1.59	

b

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