

## TEST REPORT

### *Covering the DYNAMIC FREQUENCY SELECTION (DFS) REQUIREMENTS OF*

*FCC Part 15 Subpart E (UNII), RSS-210 Annex 9*

*Intel Mobile Communications  
Model: 7265D2W*

IC CERTIFICATION #: 1000M-7265D2

FCC ID: PD97265D2

COMPANY: Intel Mobile Communications  
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Columbia, SC, 29210

TEST SITE: National Technical Systems - Silicon Valley  
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### VALIDATING SIGNATORIES

PROGRAM MGR /  
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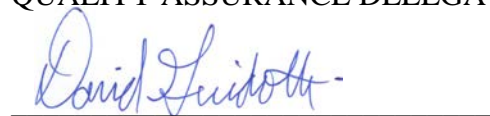
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***REVISION HISTORY***

Rev #	Date	Comments	Modified By
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## SCOPE

Test data has been taken pursuant to the relevant DFS requirements of the following standard(s):

- FCC Part 15 Subpart E Unlicensed National Information Infrastructure (U-NII) Devices.
- RSS-210 Annex 9 Local Area Network Devices.

Tests were performed in accordance with these standards together with the current published versions of the basic standards referenced therein including FCC KDB 848637 and the appendix to FCC 06-96 MO&O as outlined in NTS Silicon Valley test procedures. The test results recorded herein are based on a single type test of the Intel Mobile Communications 7265D2W and therefore apply only to the tested sample. The sample was selected and prepared by Steve Hackett of Intel Mobile Communications.

## OBJECTIVE

The objective of the manufacturer is to comply with the standards identified in the previous section. In order to demonstrate compliance, the manufacturer or a contracted laboratory makes measurements and takes the necessary steps to ensure that the equipment complies with the appropriate technical standards. Compliance with some DFS features is covered through a manufacturer statement or through observation of the device.

## STATEMENT OF COMPLIANCE

The tested sample of the Intel Mobile Communications 7265D2W complied with the DFS requirements of FCC Part 15.407(h)(2), RSS-210 Annex 9.3.

Maintenance of compliance is the responsibility of the manufacturer. Any modifications to the product should be assessed to determine their potential impact on the compliance status of the device with respect to the standards detailed in this test report.

## DEVIATIONS FROM THE STANDARD

No deviations were made from the test methods and requirements covered by the scope of this report.

Note, per KDB 905462 D03, DFS evaluation in the 80MHz mode of the 802.11ac operation was not performed.

**TEST RESULTS****TEST RESULTS SUMMARY – FCC Part 15, CLIENT DEVICE**

Table 1 - FCC Part 15 Subpart E Client Device Test Result Summary						
Description	Radar Type	EUT Frequency	Measured Value	Requirement	Test Data	Status
Channel closing transmission time	Type 1	5700MHz 5550MHz	2.0 ms 2.0 ms	60ms	Appendix B	Pass
Channel move time	Type 1	5700MHz 5550MHz	0.6 s 0.7 s	10s	Appendix B	Pass
Non-occupancy period - associated	Type 1	5500MHz 5510MHz	> 30 minutes	> 30 minutes	Appendix B	Pass
Passive Scanning	N/A	N/A	Refer to manufacturer attestation			
1) Tests were performed using the radiated test method.						
2) Channel availability check, detection threshold and non-occupancy period are not applicable to client devices.						

**MEASUREMENT UNCERTAINTIES**

ISO/IEC 17025 requires that an estimate of the measurement uncertainties associated with the emissions test results be included in the report. The measurement uncertainties given below are based on a 95% confidence level, with a coverage factor (k=2) and were calculated in accordance with UKAS document LAB 34.

Measurement	Measurement Unit	Expanded Uncertainty
Timing (Channel move time, aggregate transmission time)	ms	Timing resolution ± 0.24%
Timing (non occupancy period)	seconds	5 seconds
DFS Threshold (radiated)	dBm	1.6
DFS Threshold (conducted)	dBm	1.2

**EQUIPMENT UNDER TEST (EUT) DETAILS****GENERAL**

The Intel Mobile Communications 7265D2W is a PCIe form factor IEEE 802.11 a/b/g/n/ac +Bluetooth Low Energy wireless network adapter that operates in both the 2.4GHz and 5GHz bands. The card supports 2x2 for 802.11 modes in 20MHz, 40MHz and 80MHz bandwidths.

The sample was received on June 5, 2014 and tested on June 10, 2014. The EUT consisted of the following component(s):

Manufacturer	Model	Description	Serial Number	FCC ID	IC ID
Intel Mobile Communications	7265D2W	PCIe M.2 IEEE 2x2 802.11a/b/g/n/ac (80MHz) wireless network adapter	00:15:00:F1:5B:7B	PD97265D2	1000M-7265D2

The manufacturer declared values for the EUT operational characteristics that affect DFS are as follows:

**Operating Modes (5250 – 5350 MHz, 5470 – 5725 MHz)**

☒ Client Device (no In Service Monitoring, no Ad-Hoc mode)

**Antenna Gains / EIRP (5250 – 5350 MHz, 5470 – 5725 MHz)**

	5250 – 5350 MHz	5470 – 5725 MHz
Lowest Antenna Gain (dBi)	3.7	4.8
Highest Antenna Gain (dBi)	3.7	4.8
EIRP Output Power (dBm)	16.5	16.5

☐ Power can exceed 200mW eirp

**Channel Protocol**

☒ IP Based

**ENCLOSURE**

The EUT has no enclosure. It is designed to be installed within the enclosure of a host computer.

**MODIFICATIONS**

The EUT did not require modifications during testing in order to comply with the requirements of the standard(s) referenced in this test report.



**SUPPORT EQUIPMENT**

The following equipment was used as local support equipment for testing:

Manufacturer	Model	Description	Serial Number	FCC ID
Dell	Latitude E5400	Laptop (EUT host)	8FZW54J	DoC
<i>Cisco</i>	<i>AIR-CT5502G-K9</i>	<i>Access Point</i>	<i>FTX1209906V</i>	<i>FCC: LDK102062 IC: 2461B- 24610262</i>
Dell	Inspiron 8600	Laptop	42707742661	-

The italicized device was the master device.

**EUT INTERFACE PORTS**

The I/O cabling configuration during testing was as follows:

Port	Connected To	Cable(s)		
		Description	Shielded or Unshielded	Length (m)
AP – POE	POE Injector / remote laptop	CAT5	Unshielded	5.0

**EUT OPERATION**

The EUT was operating with the following software. The software is secured by encryption to prevent the user from disabling the DFS function.

Client Device: 17.1.0.11

During the in-service monitoring detection probability and channel moving tests the system was configured with a streaming video file from the master device (sourced by the PC connected to the master device via an Ethernet interface) to the client device.

The streamed file was the “FCC” test file and the client device was using Windows Media Player Classic as required by FCC Part 15 Subpart E.

**RADAR WAVEFORMS**

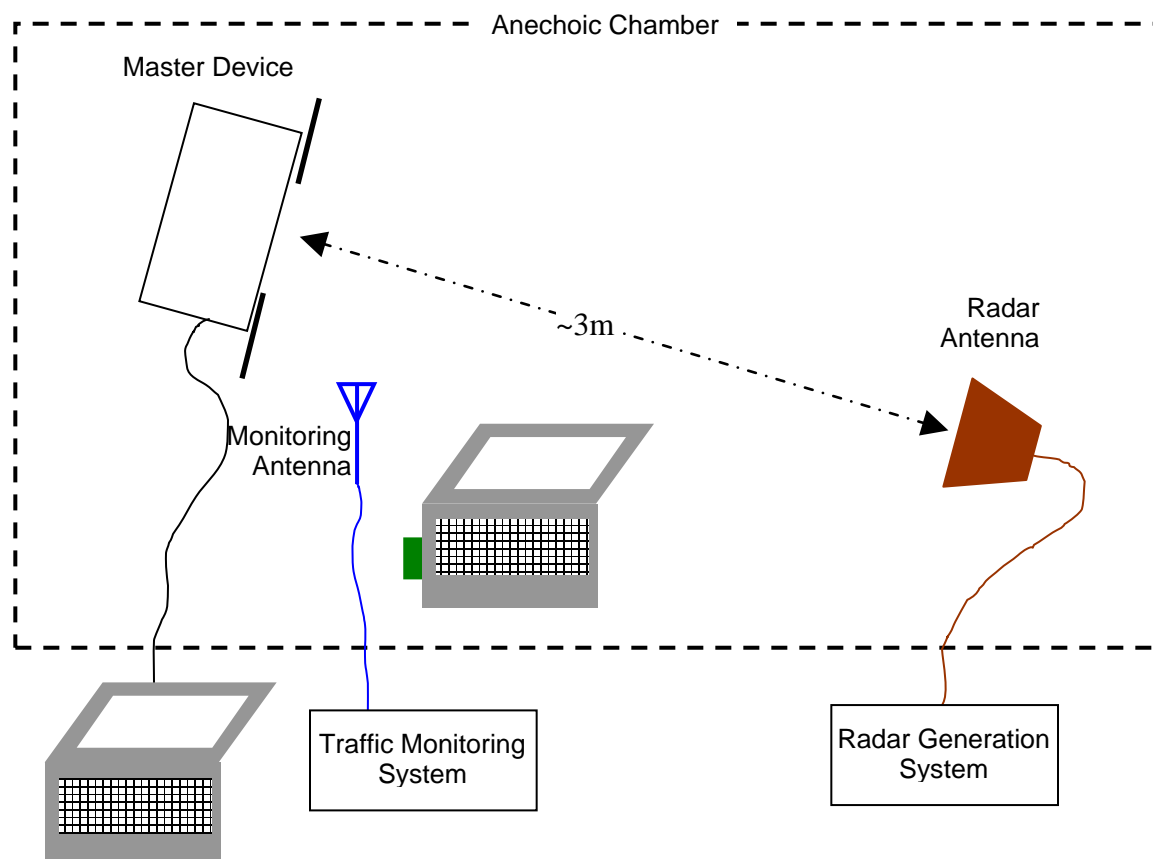
<b>Table 2 - FCC Short Pulse Radar Test Waveforms</b>					
Radar Type	Pulse Width (μsec)	PRI (μsec)	Pulses / burst	Minimum Detection Percentage	Minimum Number of Trials
1	1	1428	18	60%	30
2	1-5	150-230	23-29	60%	30
3	6-10	200-500	16-18	60%	30
4	11-20	200-500	12-16	60%	30
Aggregate (Radar Types 1-4)				80%	120

<b>Table 3 - FCC Long Pulse Radar Test Waveforms</b>							
Radar Type	Pulse Width (μsec)	Chirp Width (MHz)	PRI (μsec)	Pulses / burst	Number of Bursts	Minimum Detection Percentage	Minimum Number of Trials
5	50-100	5-20	1000-2000	1-3	8-20	80%	30

<b>Table 4 - FCC Frequency Hopping Radar Test Waveforms</b>							
Radar Type	Pulse Width (μsec)	PRI (μsec)	Pulses / hop	Hopping Rate (kHz)	Hopping Sequence Length (msec)	Minimum Detection Percentage	Minimum Number of Trials
6	1	333	9	0.333	300	70%	30

**DFS TEST METHODS****RADIATED TEST METHOD**

The combination of master and slave devices is located in an anechoic chamber. The simulated radar waveform is transmitted from a directional horn antenna (typically an EMCO 3115) toward the unit performing the radar detection (radar detection device, RDD). Every effort is made to ensure that the main beam of the EUT's antenna is aligned with the radar-generating antenna.



**Figure 1 Test Configuration for radiated Measurement Method**

The signal level of the simulated waveform is set to a reference level equal to the threshold level (plus 1dB if testing against FCC requirements). Lower levels may also be applied on request of the manufacturer. The level reported is the level at the RDD antenna and so it is not corrected for the RDD's antenna gain. The RDD is configured with the lowest gain antenna assembly intended for use with the device.

The signal level is verified by measuring the CW signal level from the radar generation system using a reference antenna of gain  $G_{REF}$  (dBi). The radar signal level is calculated from the measured level,  $R$  (dBm), and any cable loss,  $L$  (dB), between the reference antenna and the measuring instrument:

$$\text{Applied level (dBm)} = R - G_{REF} + L$$

If both master and client devices have radar detection capability then the device not under test is positioned with absorbing material between its antenna and the radar generating antenna, and the radar level at the non RDD is verified to be at least 20dB below the threshold level to ensure that any responses are due to the RDD detecting radar.

The antenna connected to the channel monitoring subsystem is positioned to allow both master and client transmissions to be observed, with the level of the EUT's transmissions between 6 and 10dB higher than those from the other device.

## **DFS MEASUREMENT INSTRUMENTATION**

### **RADAR GENERATION SYSTEM**

An Agilent PSG is used as the radar-generating source. The integral arbitrary waveform generators are programmed using Agilent's "Pulse Building" software and NTS Silicon Valley custom software to produce the required waveforms, with the capability to produce both un-modulated and modulated (FM Chirp) pulses. Where there are multiple values for a specific radar parameter then the software selects a value at random and, for FCC tests, the software verifies that the resulting waveform is truly unique.

With the exception of the hopping waveforms required by the FCC's rules (see below), the radar generator is set to a single frequency within the radar detection bandwidth of the EUT. The frequency is varied from trial to trial by stepping in 5MHz steps.

Frequency hopping radar waveforms are simulated using a time domain model. A randomly hopping sequence algorithm (which uses each channel in the hopping radar's range once in a hopping sequence) generates a hop sequence. A segment of the first 100 elements of the hop sequence are then examined to determine if it contains one or more frequencies within the radar detection bandwidth of the EUT. If it does not then the first element of the segment is discarded and the next frequency in the sequence is added. The process repeats until a valid segment is produced. The radar system is then programmed to produce bursts at time slots coincident with the frequencies within the segment that fall in the detection bandwidth. The frequency of the generator is stepped in 1 MHz increments across the EUT's detection range.

The radar signal level is verified during testing using a CW signal with the AGC function switched on. Correction factors to account for the fact that pulses are generated with the AGC functions switched off are measured annually and an offset is used to account for this in the software.

The generator output is connected to the coupling port of the conducted set-up or to the radar-generating antenna.

**CHANNEL MONITORING SYSTEM**

Channel monitoring is achieved using a spectrum analyzer and digital storage oscilloscope. The analyzer is configured in a zero-span mode, center frequency set to the radar waveform's frequency or the center frequency of the EUT's operating channel. The IF output of the analyzer is connected to one input of the oscilloscope.

A signal generator output is set to send either the modulating signal directly or a pulse gate with an output pulse co-incident with each radar pulse. This output is connected to a second input on the oscilloscope and the oscilloscope displays both the channel traffic (via the IF input) and the radar pulses on its display.

For in service monitoring tests the analyzer sweep time is set to  $> 20$  seconds and the oscilloscope is configured with a data record length of 10 seconds for the short duration and frequency hopping waveforms, 20 seconds for the long duration waveforms. Both instruments are set for a single acquisition sequence. The analyzer is triggered 500ms before the start of the waveform and the oscilloscope is triggered directly by the modulating pulse train. Timing measurements for aggregate channel transmission time and channel move time are made from the oscilloscope data, with the end of the waveform clearly identified by the pulse train on one trace. The analyzer trace data is used to confirm that the last transmission occurred within the 10-second record of the oscilloscope. If necessary the record length of the oscilloscope is expanded to capture the last transmission on the channel prior to the channel move.

Channel availability check time timing plots are made using the analyzer. The analyzer is triggered at start of the EUT's channel availability check and used to verify that the EUT does not transmit when radar is applied during the check time.

The analyzer detector and oscilloscope sampling mode is set to peak detect for all plots.

## **DFS MEASUREMENT METHODS**

### **DFS – CHANNEL CLOSING TRANSMISSION TIME AND CHANNEL MOVE TIME**

Channel clearing and closing times are measured by applying a burst of radar with the device configured to change channel and by observing the channel for transmissions. The time between the end of the applied radar waveform and the final transmission on the channel is the channel move time.

The aggregate transmission closing time is measured in one of two ways:

FCC/KCC Notice No. 2010-48 – the total time of all individual transmissions from the EUT that are observed starting 200ms at the end of the last radar pulse in the waveform. This value is required to be less than 60ms.

### **DFS – CHANNEL NON-OCCUPANCY AND VERIFICATION OF PASSIVE SCANNING**

The channel that was in use prior to radar detection by the master is additionally monitored for 30 minutes to ensure no transmissions on the vacated channel over the required non-occupancy period. This is achieved by tuning the spectrum analyzer to the vacated channel in zero-span mode and connecting the IF output to an oscilloscope. The oscilloscope is triggered by the radar pulse and set to provide a single sweep (in peak detect mode) that lasts for at least 30 minutes after the end of the channel move time.

For devices with a client-mode that are being evaluated against FCC rules the manufacturer must supply an attestation letter stating that the client device does not employ any active scanning techniques (i.e. does not transmit in the DFS bands without authorization from a Master device).

**Appendix A Test Equipment Calibration Data**

<b><u>Manufacturer</u></b>	<b><u>Description</u></b>	<b><u>Model #</u></b>	<b><u>Asset #</u></b>	<b><u>Cal Due</u></b>
Hewlett Packard	EMC Spectrum Analyzer, 9 kHz - 6.5 GHz	8595EM	780	20-Aug-14
EMCO	Antenna, Horn, 1-18 GHz	3115	2732	12-Nov-14
EMCO	Antenna, Horn, 1-18 GHz	3115	1386	26-Sep-14
Agilent Technologies	PSG Vector Signal Generator (250kHz - 20GHz)	E8267C	1877	05-Jun-14
Tektronix	Digital Phosphor Oscilloscope	TDS5502B	2118	23-Oct-14



**Appendix B Test Data Tables and Plots for Channel Closing****FCC PART 15 SUBPART E Channel Closing Measurements**

<b>Table 5 - FCC Part 15 Subpart E Channel Closing Test Results</b>					
Waveform Type	Channel Closing Transmission Time <sup>1</sup>		Channel Move Time		Result
	Measured	Limit	Measured	Limit	
Radar Type 1 (20MHz)	2.0 ms	60 ms	0.6 s	10 s	Pass
Radar Type 1 (40MHz)	2.0 ms	60 ms	0.7 s	10 s	Pass

After the final channel closing test the channel was monitored for a further 30 minutes. No transmissions occurred on the channel.

Note - all plots were generated by observing the channel with the control signals.

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<sup>1</sup> Channel closing time for FCC measurements is the aggregate transmission time starting from 200ms after the end of the radar signal to the completion of the channel move.

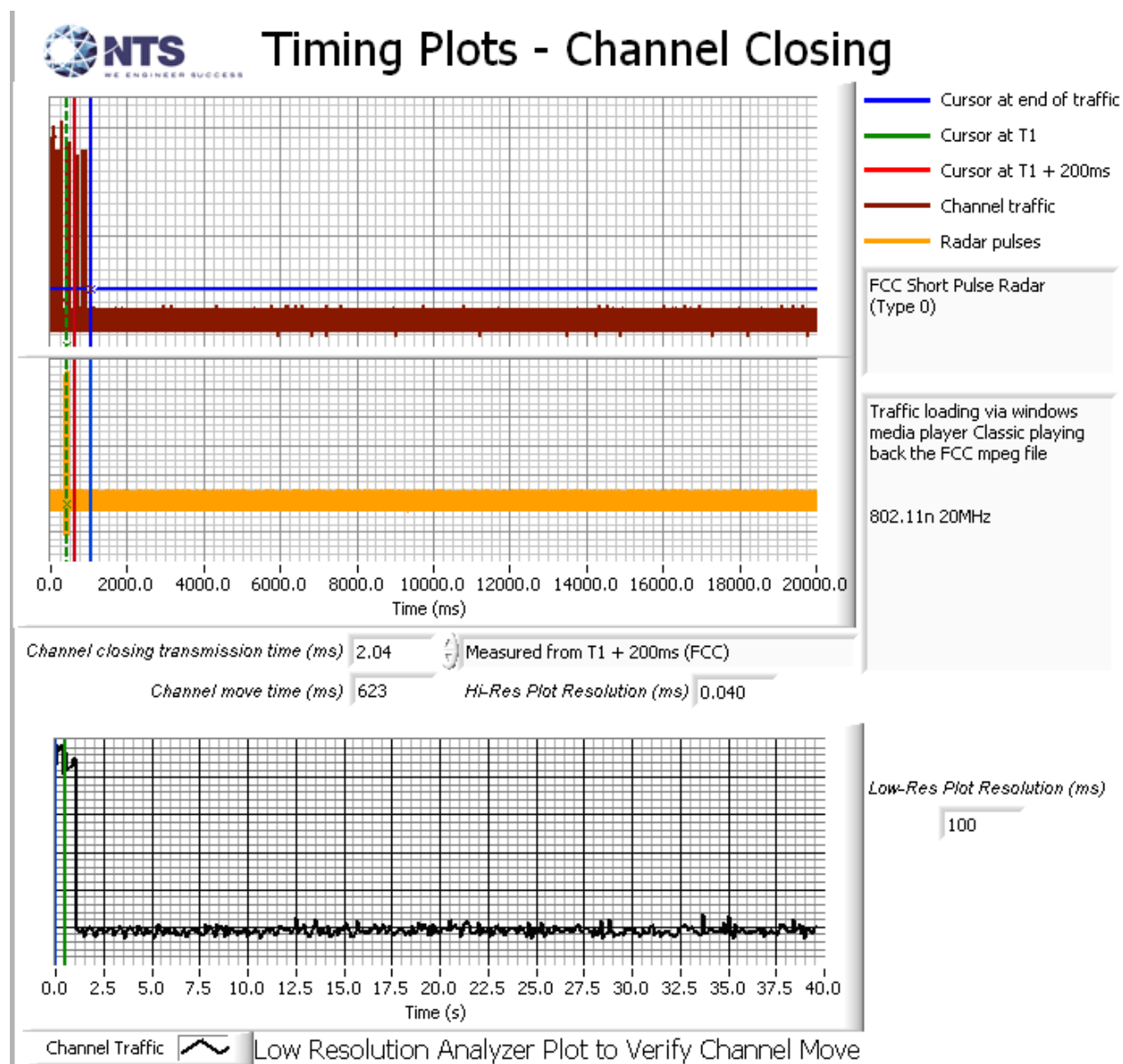


Figure 2 Channel Closing Time and Channel Move Time (20MHz) – 40 second plot

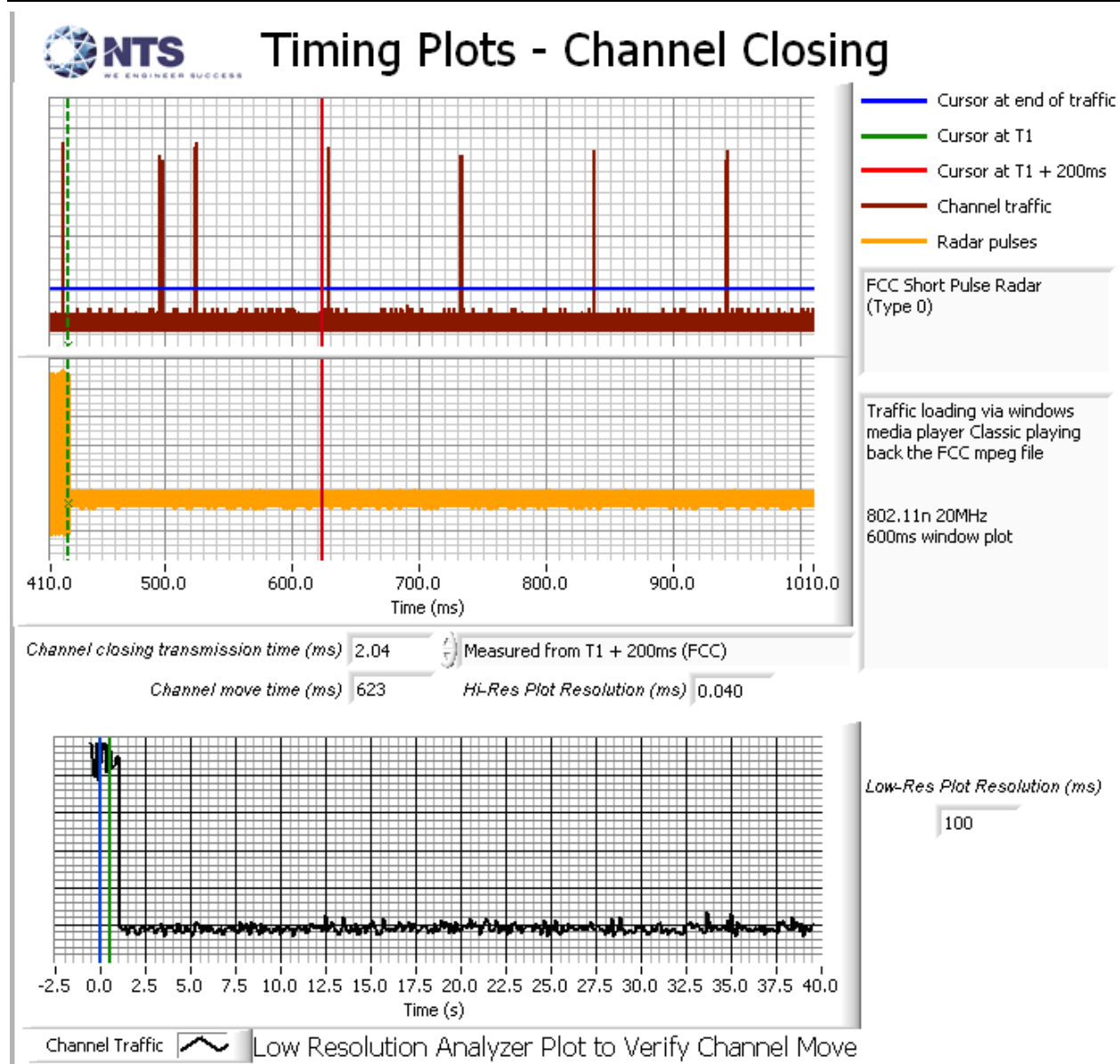


Figure 3 Close-Up of Transmissions Occurring More Than 200ms After The End of Radar (20MHz)

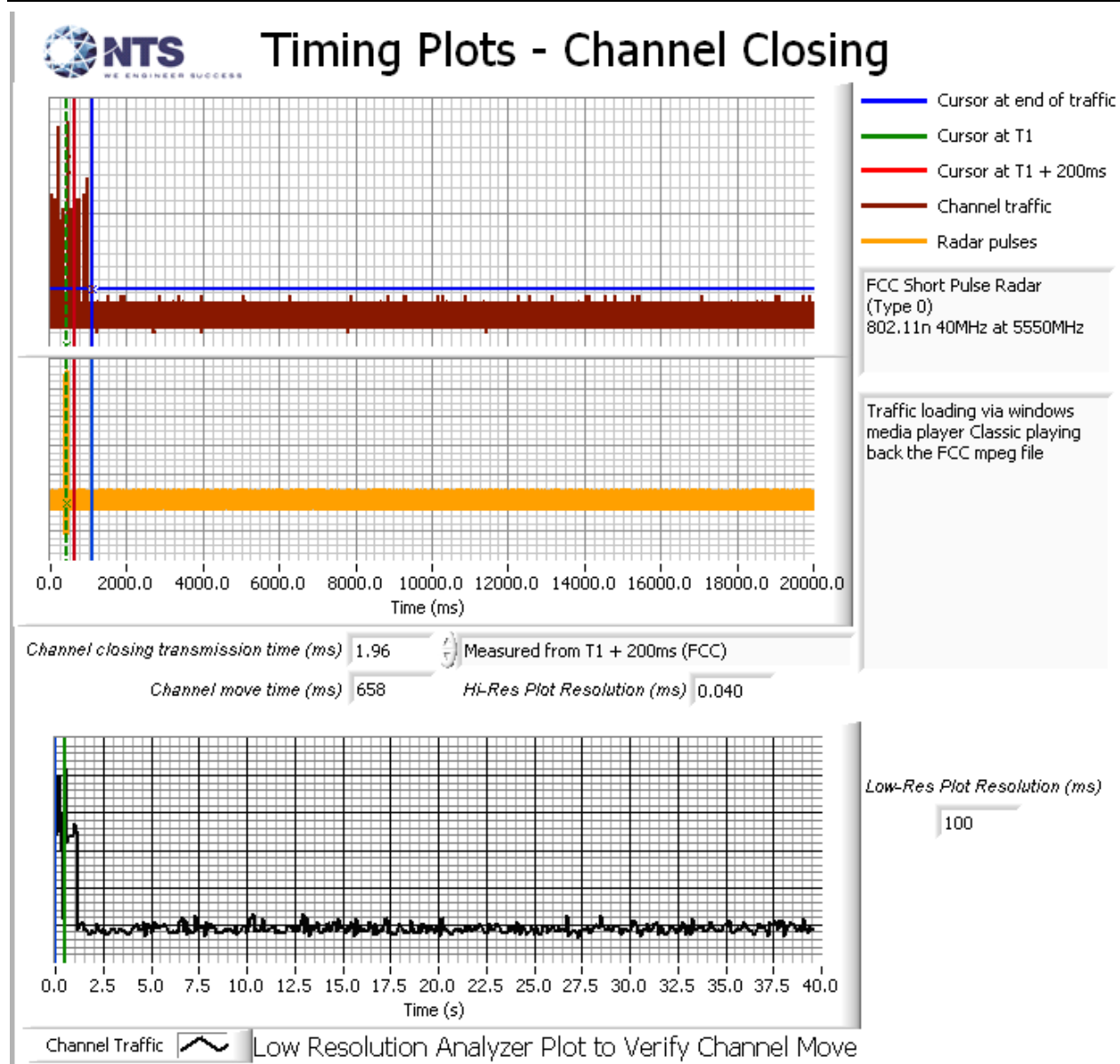


Figure 4 Channel Closing Time and Channel Move Time (40MHz) – 40 second plot

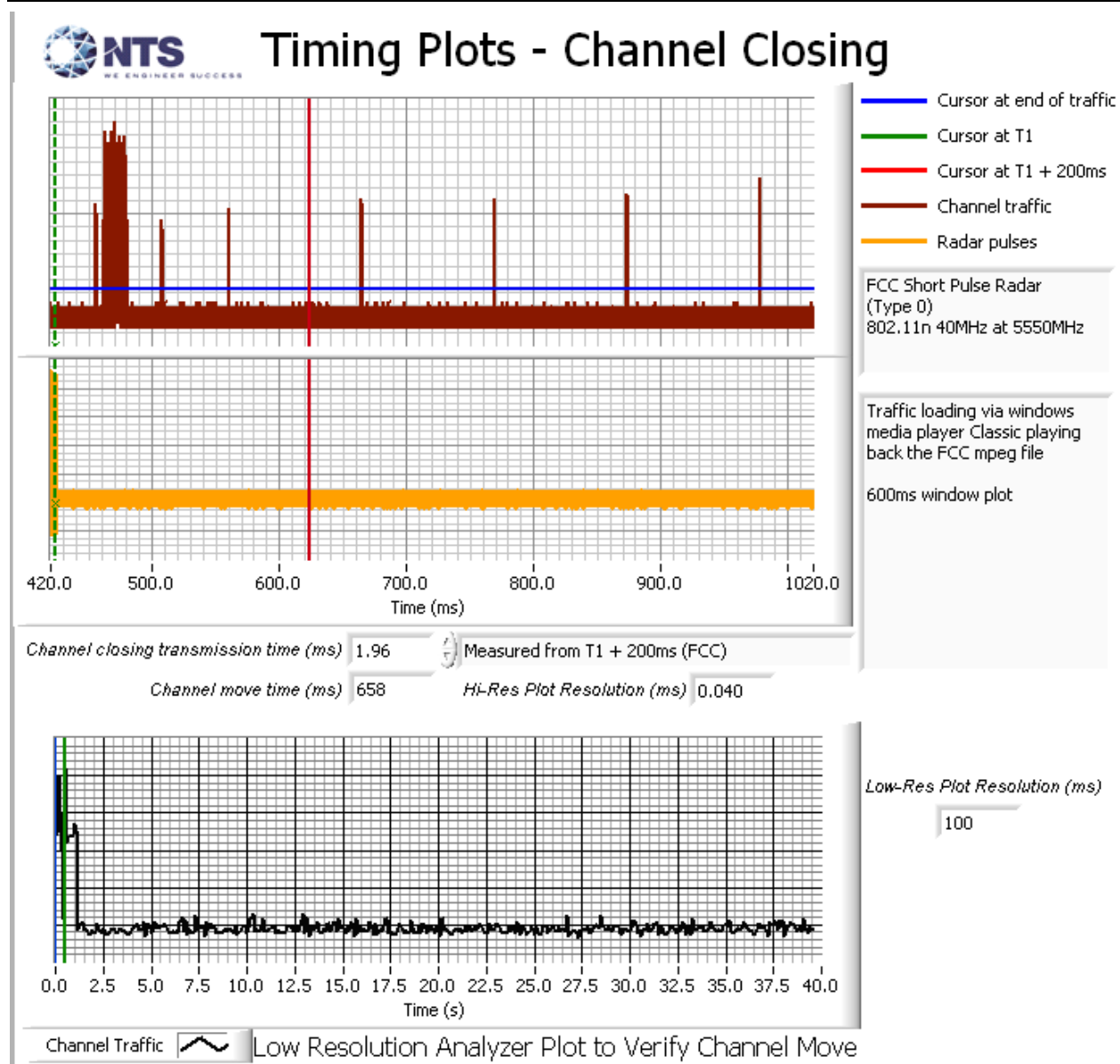
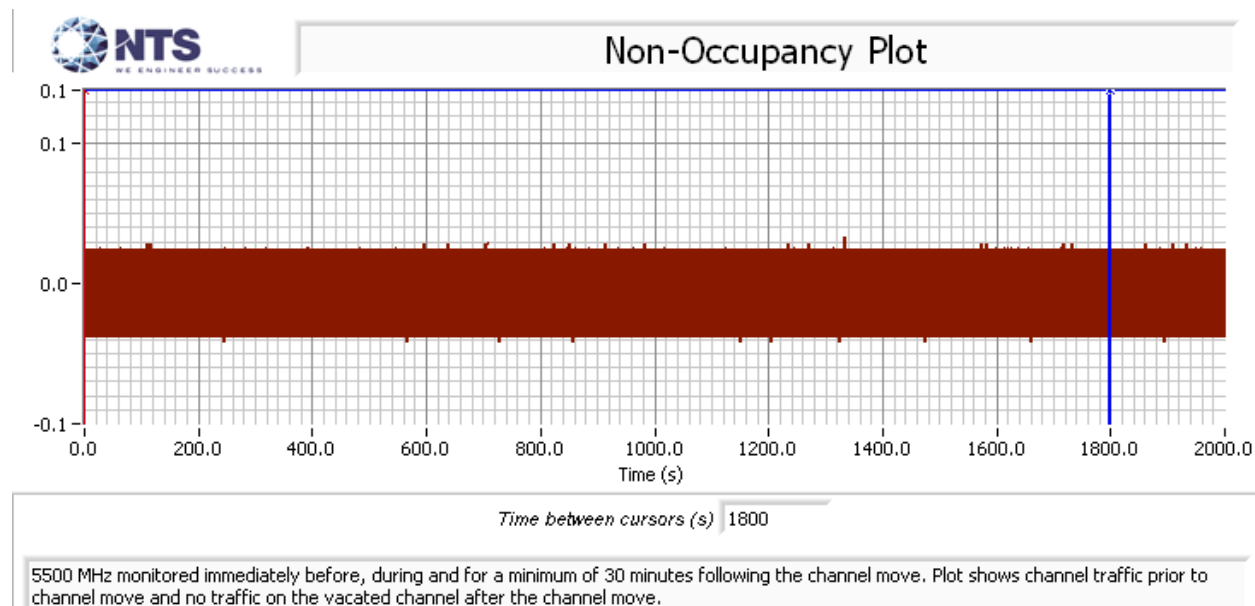
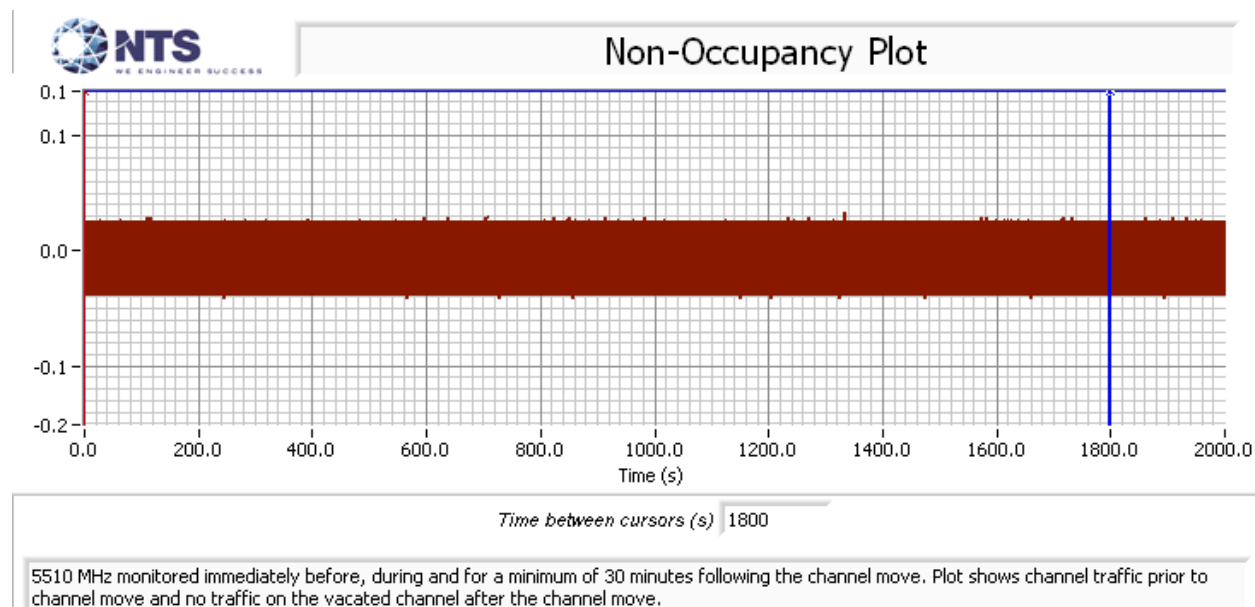


Figure 5 Close-Up of Transmissions Occurring More Than 200ms After The End of Radar (40MHz)



**Figure 6 Radar Channel Non-Occupancy Plot (20MHz)**



**Figure 7 Radar Channel Non-Occupancy Plot (40MHz)**

The non-occupancy plot was made over a 30-minute time period following the channel move time with the analyzer IF output connected to the scope and tuned to the vacated channel. No transmissions were observed after the channel move had been completed.

After the channel move the client device stopped transmitting on the vacated channel. After the channel move the client re-associated with the master device on the new channel.

*End of Report*

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