



FCC PART 15, SUBPART C
ISEDC RSS-247, ISSUE 2, FEBRUARY 2017
TEST REPORT

For

Zebra Technologies Corporation

3 Overlook Point, Lincolnshire, IL 60069, USA

**FCC ID: I28MD-FXLAN11AC
IC: 3798B-FXLAN11AC**

Report Type: Class II Permissive Change	Product Type: Wireless 802.11ac + Bluetooth Module
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Report Number: R1911192-247 DTS	
Report Date: 2020-01-23	
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Note: This test report was prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This test report shall not be used by the customer to claim product certification, approval, or endorsement by A2LA or any agency of the United States Government or any foreign government.

* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk **

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1911192-247 DTS	CIIPC Report	2020-01-23

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Zebra Technologies Corp.*, and their product model: WYSBHVGXG, FCC ID: I28MD-FXLAN11AC, IC: 3798B-FXLAN11AC, the “EUT” as referred to in this report. The EUT is a Wireless 802.11ac + Bluetooth Module. The EUT was installed in host device model number: ZQ511, ZQ521. The host devices were declared to be identical, and ZQ521 was selected for testing. Please refer to the manufacturer declaration of similarity letter in Annex C of this report.

1.2 Objective

This report is prepared on behalf of *Zebra Technologies Corp.* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISEDC RSS-247 Issue 2, February 2017.

The objective is to determine compliance with FCC Part 15.247 and ISEDC RSS-247 for Radiated Spurious Emissions testing, AC Line Conducted Emission testing and to verify the Output Power.

This project is a Permissive Change II submission for the purpose of placing the module in new host (Model: ZQ511, ZQ521), lowering power, and enabling colocation with RFID (FCC ID: I28-RFIDM6EMTT, IC: 3798B-RFIDM6EMTT).

Model Number	WYSBHVGXG (EUT)
FCC ID	I28MD-FXLAN11AC
IC	3798B-FXLAN11AC
Radio Type	WLAN-ac/bt
Operating Frequency	2402MHz – 2480MHz, 2412MHz – 2462MHz 5180MHz – 5240MHz, 5260MHz – 5320MHz 5500MHz – 5700MHz, 5745MHz – 5825MHz
Modulation	GFSK, $\pi/4$ -DQPSK, 8DPSK (BDR/EDR); GFSK (LE); DSSS, OFDM (WLAN)
Channel Spacing	1MHz (BDR, EDR); 2MHz (LE) 5MHz (2.4G); 20MHz (5G); 40MHz (5G) ; 80MHz (5G)
Omnidirectional Antenna Gain	3.66 dBi (2.4G), 3.19 dBi (5G);
Original RF Output Power	0.0081W (BDR/EDR); 0.0071W (LE) 0.0399W (2.4G WLAN); 0.0115W (UNII-1); 0.0086W (UNII-2); 0.0086W (UNII-2E); 0.0073W (UNII-3)

Model Number	M6E-NANO
FCC ID	I28- M6ENANO
IC	3798B-M6ENANO
Radio Type	UHF RFID
Operating Frequency	902MHz – 928MHz
Modulation	ASK
Channel Spacing	500 kHz
Loop Antenna Gain	-28 dBi
RF Output power	0.147 Watt

1.3 Related Submittal(s)/Grant(s)

R19111924-247 DSS

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247

1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.6 Test Facility Registrations

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03) to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Industry Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.

- For Singapore (Info-Communications Development Authority (IDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2

- For the Hong Kong Special Administrative Region:

- 1 All Radio Equipment, per KHCA 10XX-series Specifications;
- 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
- 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.

- For Japan:

- 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
- 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

2.2 EUT Exercise Software

The test utility used was the “Toolbox v1.83”, provided by *Zebra Technologies Corp.*, the software is compliant with the standard requirements being tested against.

2.3 Equipment Modifications

Installation in host device; lowering output power.

2.4 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6410	3CKRAQ1

2.5 Interface Ports and Cabling

Cable Descriptions	Length (m)	From	To
USB Cable	< 1	Laptop	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISEDC Rules	Description of Test	Results
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247(d) ISEDC RSS-247 §5.5 ISEDC RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant
FCC §15.207 ISEDC RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
FCC §15.247(b)(1) ISEDC RSS-247 §5.4 (b)	Output Power	Compliant
FCC §2.1093 ISEDC RSS-102	RF Exposure	Note ¹

Note¹: Please refer to Test Report R1911192-SAR for RF Exposure result.

4 FCC §15.207 & ISEDC RSS-210 §8.8 - AC Line Conducted Emissions

4.1 Applicable Standards

As per FCC §15.207 and ISEDC RSS-Gen §8.8 Conducted limits:

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

Frequency of Emission (MHz)	Conducted Limit (dBuV)	
	Quasi-Peak	Average
0.15-0.5	66 to 56 ^{Note1}	56 to 46 ^{Note2}
0.5-5	56	46
5-30	60	50

Note1: Decreases with the logarithm of the frequency.

Note2: A linear average detector is required

4.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.207 and ISEDC RSS-Gen §8.8 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

The AC/DC power adapter of the EUT was connected with LISN-1 which provided 120 V / 60 Hz AC power.

4.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cords of support equipment were connected to LISN-2.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data were recorded in the peak, quasi-peak, and average detection mode. Quasi-Peak readings are distinguished with a "QP." Average readings are distinguished with an "Ave".

4.4 Corrected Amplitude & Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Cable Loss (CL), the Attenuator Factor (Atten) to indicated Amplitude (Ai) reading. The basic equation is as follows:

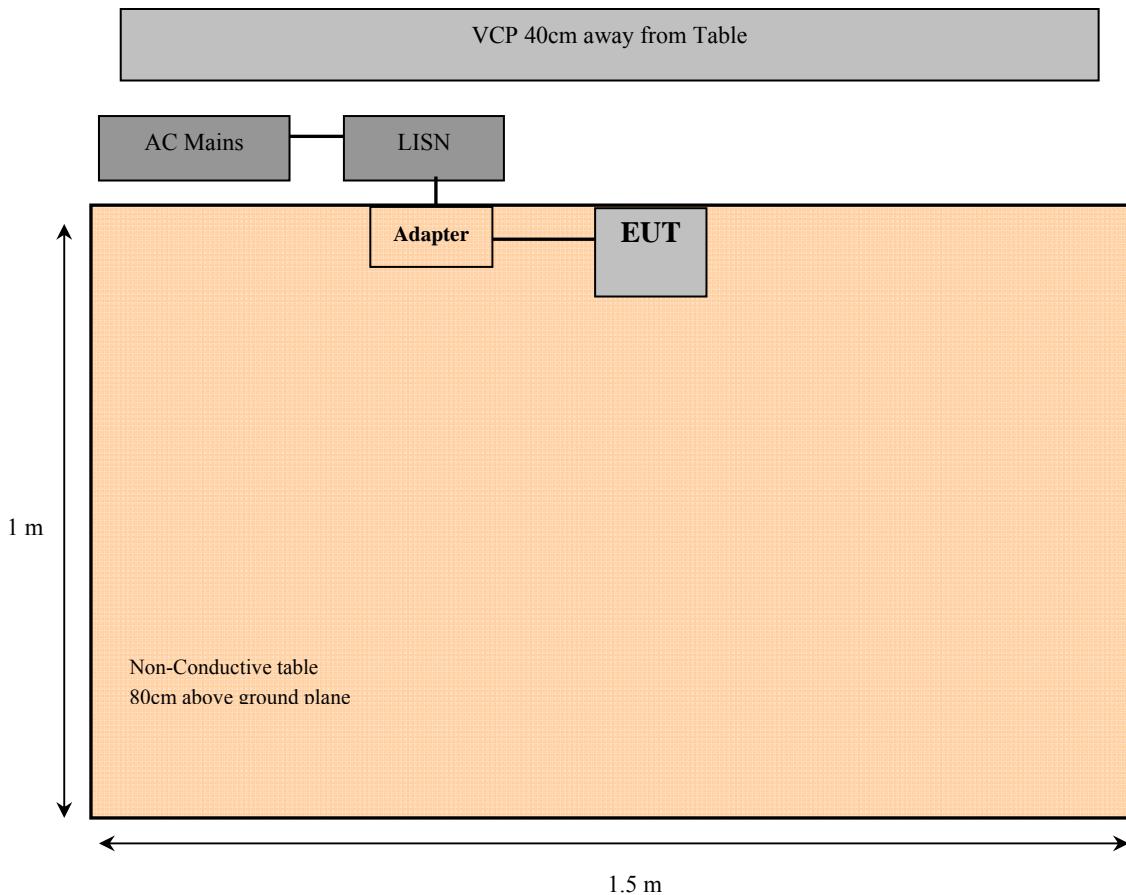
$$CA = Ai + CL + Atten$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 dB) + Attenuator (10 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

4.5 Test Setup Block Diagram



4.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101964	2019-07-31	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150204	2019-02-25	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2019-04-11	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

4.7 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	101.31 kPa

The testing was performed by Christian McCaig on 2019-12-04 in 5m chamber 3

4.8 Summary of Test Results

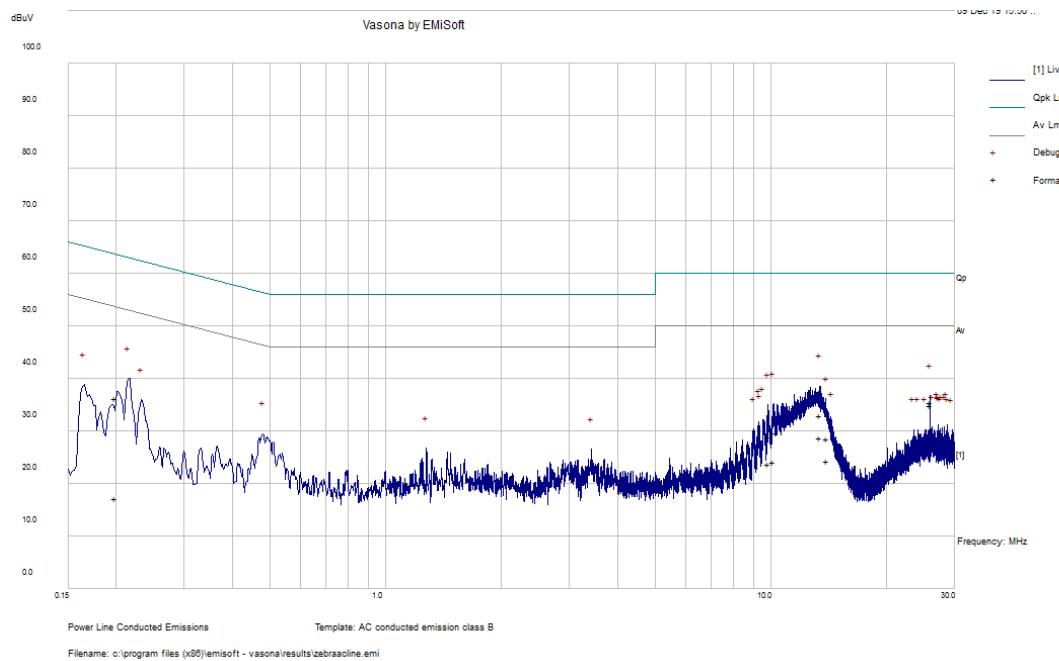
According to the recorded data in following table, the EUT complied with the FCC 15C and ISEDC RSS-Gen standard's conducted emissions limits, with the margin reading of:

Connection: AC/DC Adapter Connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-15.03	25.87134	Line	0.15-30

4.9 Conducted Emissions Test Plots and Data

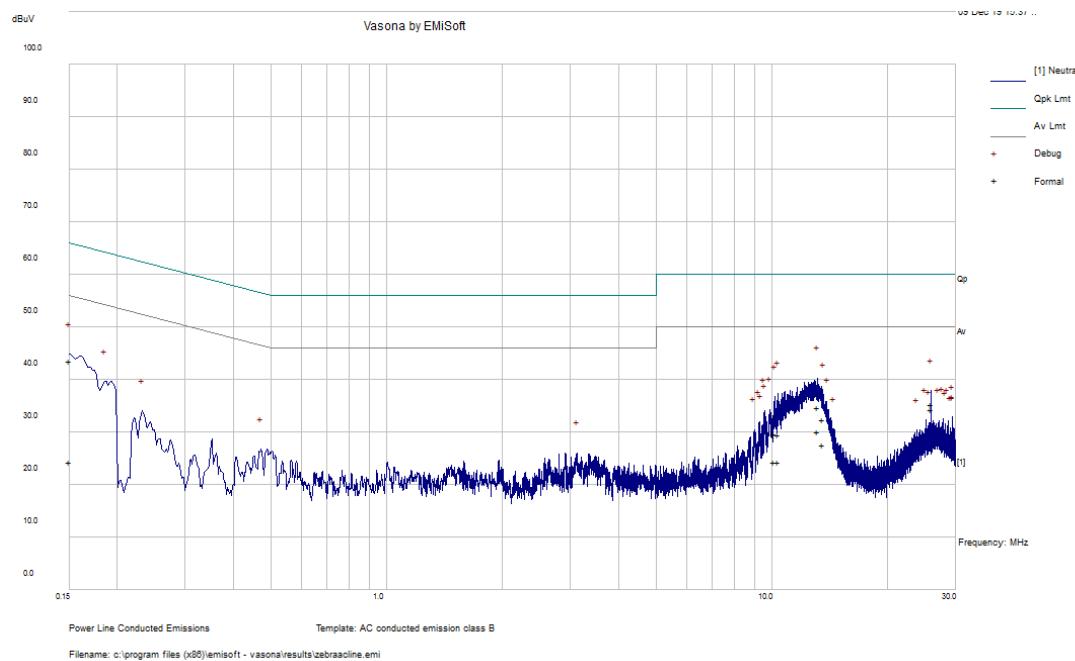
2.4 GHz Wi-Fi + RFID Colocation

120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
13.42426	33.1	Line	60	-26.9	QP
0.198949	36.25	Line	63.65	-27.4	QP
25.87063	35.59	Line	60	-24.41	QP
10.13874	29.69	Line	60	-30.31	QP
9.841474	29.03	Line	60	-30.97	QP
13.94317	28.55	Line	60	-31.45	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
13.42426	28.74	Line	50	-21.26	Ave.
0.198949	17.3	Line	53.65	-36.36	Ave.
25.87063	34.85	Line	50	-15.15	Ave.
10.13874	24.21	Line	50	-25.79	Ave.
9.841474	23.87	Line	50	-26.13	Ave.
13.94317	24.36	Line	50	-25.64	Ave.

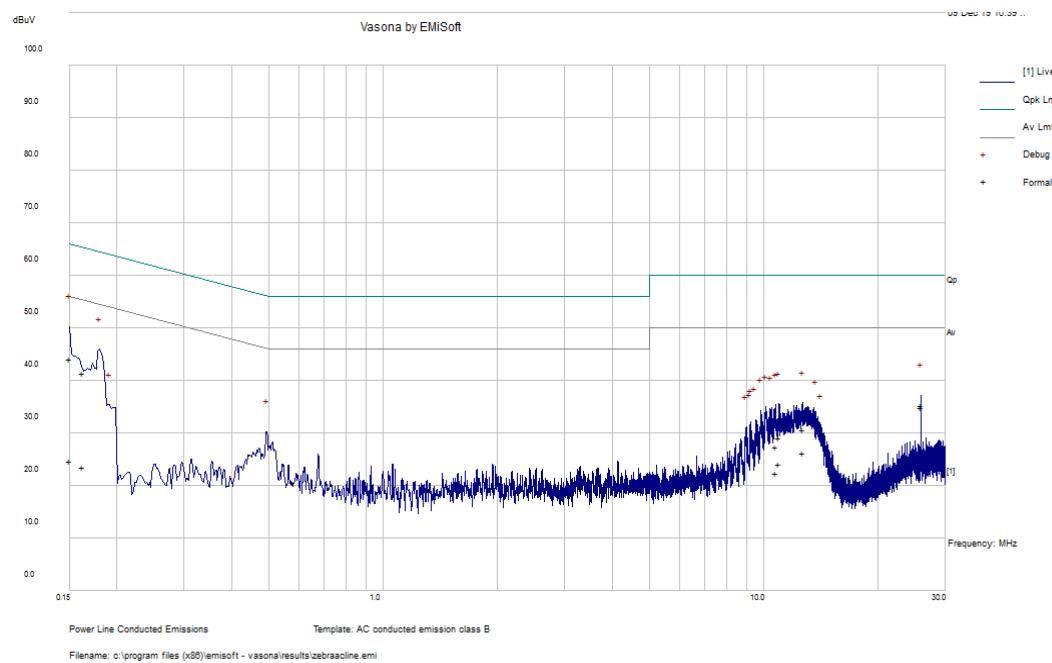
120 V, 60 Hz – Neutral

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
13.16084	34.79	Neutral	60	-25.21	QP
0.150092	43.62	Neutral	65.99	-22.37	QP
25.86998	35.33	Neutral	60	-24.67	QP
10.38812	29.53	Neutral	60	-30.47	QP
13.59432	32.53	Neutral	60	-27.47	QP
10.16083	29.78	Neutral	60	-30.22	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
13.16084	30.07	Neutral	50	-19.93	Ave.
0.150092	24.31	Neutral	55.99	-31.69	Ave.
25.86998	34.28	Neutral	50	-15.72	Ave.
10.38812	24.45	Neutral	50	-25.55	Ave.
13.59432	27.65	Neutral	50	-22.35	Ave.
10.16083	24.36	Neutral	50	-25.64	Ave.

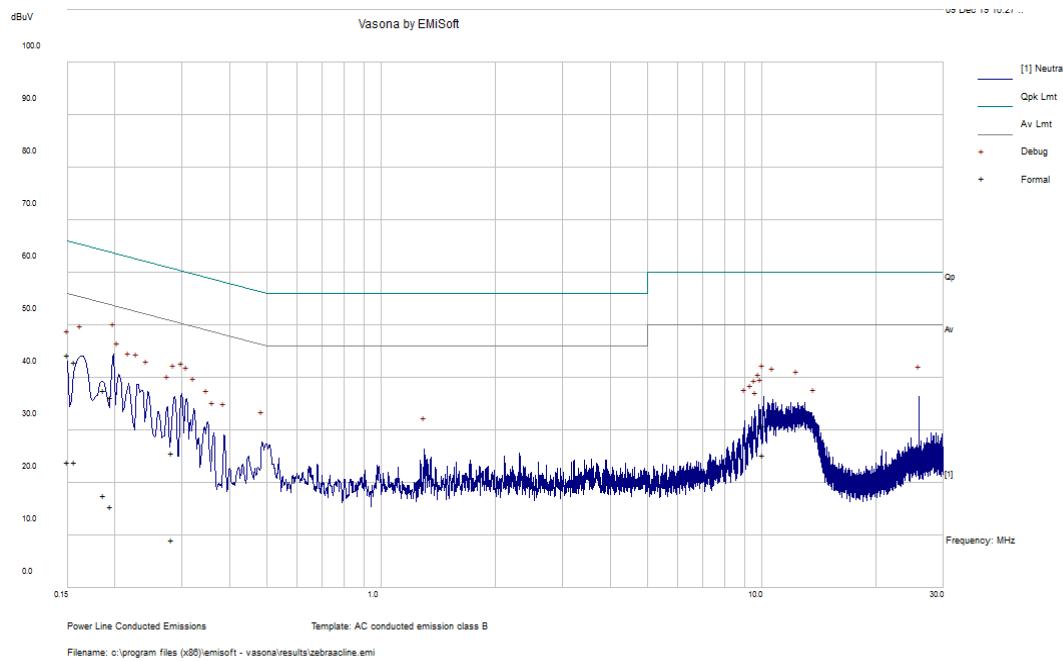
BLE + RFID Colocation

120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150068	44.08	Line	66	-21.92	QP
0.162262	41.39	Line	65.35	-23.96	QP
25.87134	35.34	Line	60	-24.66	QP
12.6908	30.75	Line	60	-29.25	QP
10.98654	29.14	Line	60	-30.86	QP
10.77789	27.53	Line	60	-32.47	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Live/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150068	24.81	Line	56	-31.18	Ave.
0.162262	23.53	Line	55.35	-31.81	Ave.
25.87134	34.97	Line	50	-15.03	Ave.
12.6908	26.26	Line	50	-23.74	Ave.
10.98654	24.13	Line	50	-25.87	Ave.
10.77789	22.52	Line	50	-27.48	Ave.

120 V, 60 Hz – Neutral

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.187487	37.71	Neutral	64.15	-26.44	QP
0.156921	43.03	Neutral	65.63	-22.6	QP
0.195298	36.19	Neutral	63.81	-27.62	QP
0.150212	44.35	Neutral	65.99	-21.63	QP
0.282302	25.75	Neutral	60.75	-35	QP
10.09679	30.84	Neutral	60	-29.16	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Live/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.187487	17.69	Neutral	54.15	-36.46	Ave.
0.156921	23.96	Neutral	55.63	-31.67	Ave.
0.195298	15.6	Neutral	53.81	-38.21	Ave.
0.150212	23.94	Neutral	55.99	-32.05	Ave.
0.282302	9.23	Neutral	50.75	-41.52	Ave.
10.09679	25.35	Neutral	50	-24.65	Ave.

5 FCC §15.35(b), §15.205, §15.209, §15.247(d) & ISED RSS-247 §5.5, RSS-Gen §8.9, §8.10- Spurious Radiated Emissions

5.1 Applicable Standards

As per FCC §15.35(b): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3 3458 – 3 358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d), in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

As per ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength (μV/m at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

5.2 Test Setup

The radiated emissions tests were performed in the 5-meter chamber and 10-meter chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISED RSS-247.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundled when necessary.

5.3 Test Procedure

For the radiated emissions test, the EUT host and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meters, and the EUT was placed on a turntable, which was 0.8 meters and 1.5 meters above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak: $\text{RBW} = 1\text{MHz} / \text{VBW} = 1\text{MHz} / \text{Sweep} = \text{Auto}$
- (2) Average: $\text{RBW} = 1\text{MHz} / \text{VBW} = 10\text{Hz} \text{ or } 1/\text{T} / \text{Sweep} = \text{Auto}$

5.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$\text{CA} = \text{Ai} + \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

5.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Agilent	Analyzer, Spectrum	E4446A	US44300386	2019-06-26	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 years
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2019-04-02	2 years
Agilent	Amplifier, Pre	8447D	2944A10187	2019-04-11	1 year
HP	Pre-Amplifier	8449B	3008A01978	2019-09-27	1 year
Wisewave	Antenna, Horn 18-26.5GHz	ARH-4223-02	10555-02	2017-12-15	2 years
Insulated Wire Corp.	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN-3960-KPS	DC 1917	2019-05-08	1 year
-	SMA cable	-	C0002	Each time ¹	N/A
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

5.6 Test Location, Date, Personnel and Environmental Conditions

Temperature:	20-22 °C
Relative Humidity:	42-50 %
Barometric Pressure:	102.7 kPa

The testing was performed by Christian McCaig from 2019-11-22 to 2019-12-12 in 5m chamber 3 and by Matthew Riego from 2019-12-06 to 2019-12-07 in 10m chamber 1.

5.7 Summary of Test Results

According to the data hereinafter, the EUT complied with the FCC Part 15.209, 15.247 and ISEDC RSS-247 standards' radiated emissions limits, and had the worst margin of:

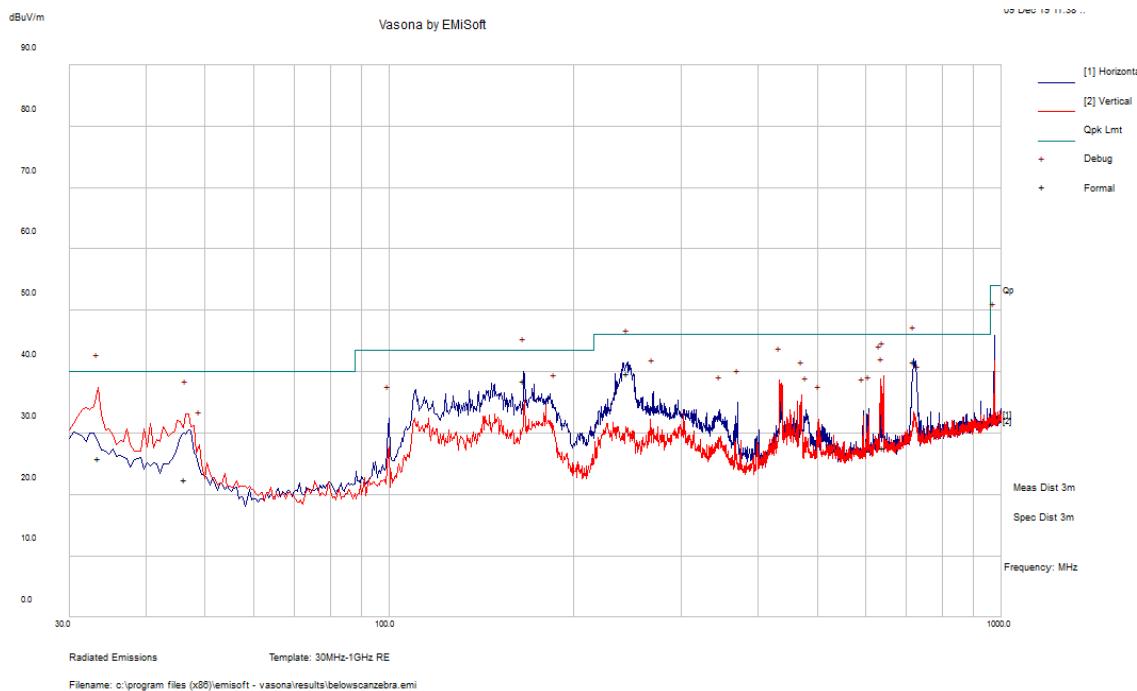
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Configuration
-0.55	17137.25	Horizontal	BLE, low channel + 927.2MHz RFID

Please refer to the following table and plots for specific test result details.

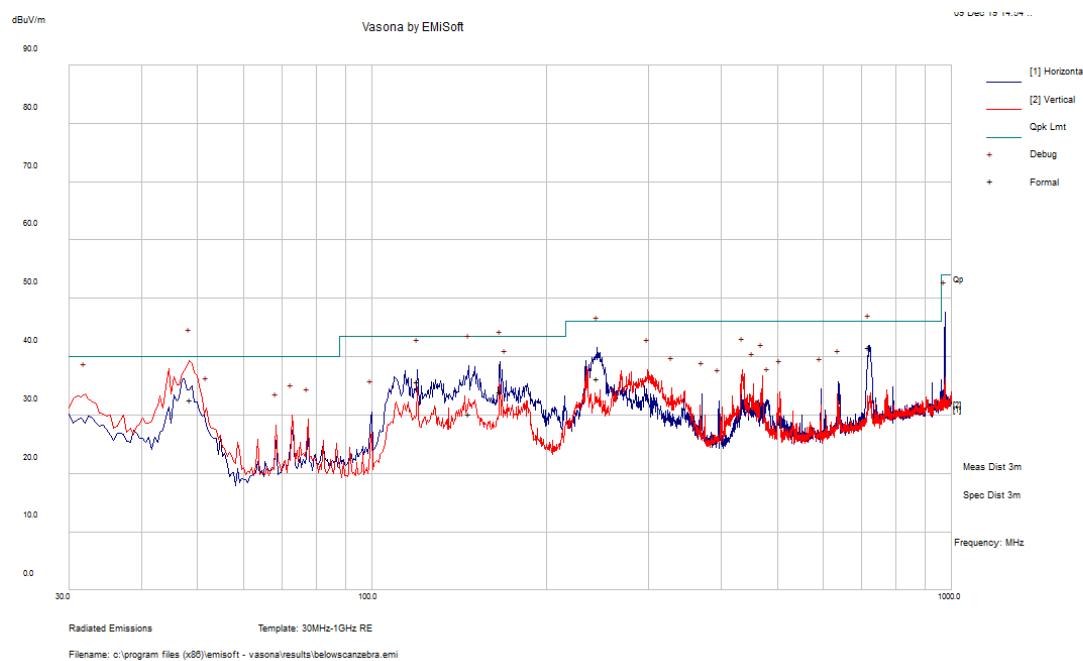
5.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

Wi-Fi + RFID Colocation



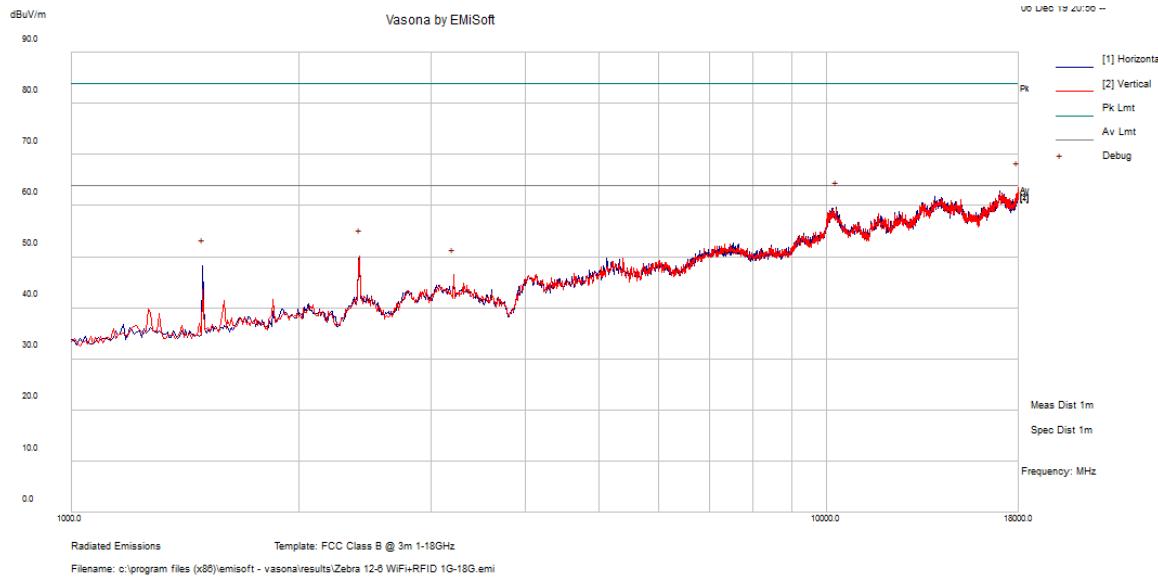
Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Comment
33.49075	25.88	251	V	237	40	-14.12	QP
166.004	38.57	214	H	289	43.5	-4.93	QP
719.2605	41.63	107	H	143	46	-4.37	QP
245.102	39.78	122	H	106	46	-6.22	QP
641.1083	27.56	104	V	14	46	-18.44	QP
46.342	22.52	149	V	65	40	-17.48	QP

BLE + RFID Colocation

Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Comment
48.60175	32.6	113	V	100	40	-7.4	QP
720.0103	41.69	102	H	151	46	-4.31	QP
166.3128	34.06	204	H	286	43.5	-9.44	QP
244.3753	36.21	138	H	64	46	-9.79	QP
146.8323	30.17	201	H	99	43.5	-13.33	QP
119.9633	35.78	241	H	155	43.5	-7.72	QP

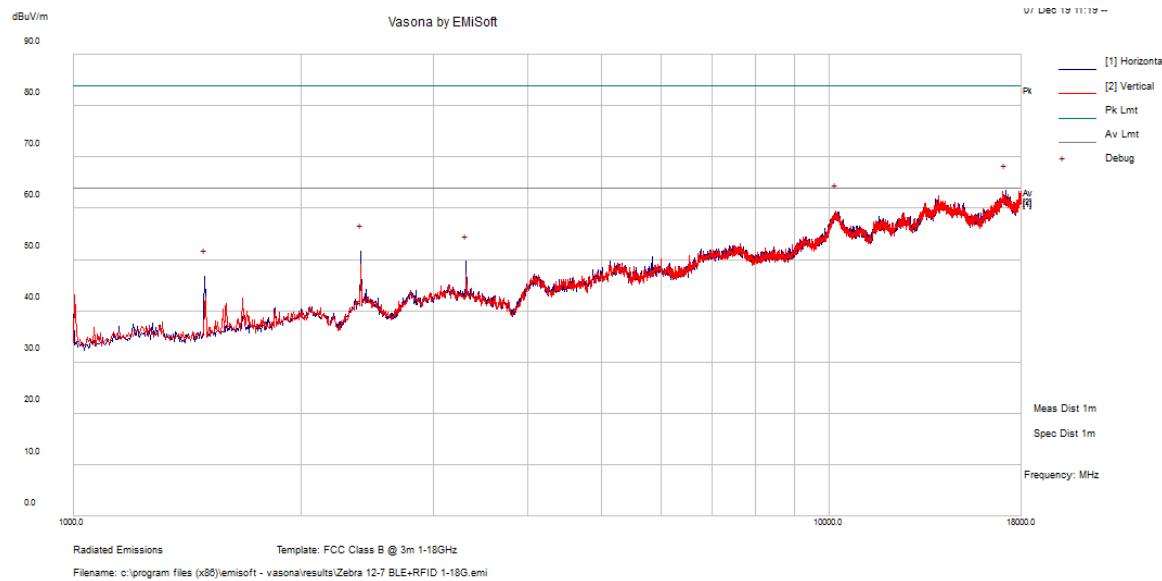
2) 1 – 18 GHz Worst Case, Measured at 1 meter

Wi-Fi + RFID Colocation



Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Detector (Peak /Avg.)
17949	63.43	V	100	0	64	-0.57	Peak*
10324.5	59.61	H	200	0	64	-4.39	Peak*
2411	50.16	V	100	0	64	-13.84	Peak*
1493	48.18	H	100	0	64	-15.82	Peak*
3210	46.46	V	200	0	64	-17.54	Peak*

Note*: Due to the testing value by using peak detector is within the average limit, no average detector testing is needed.

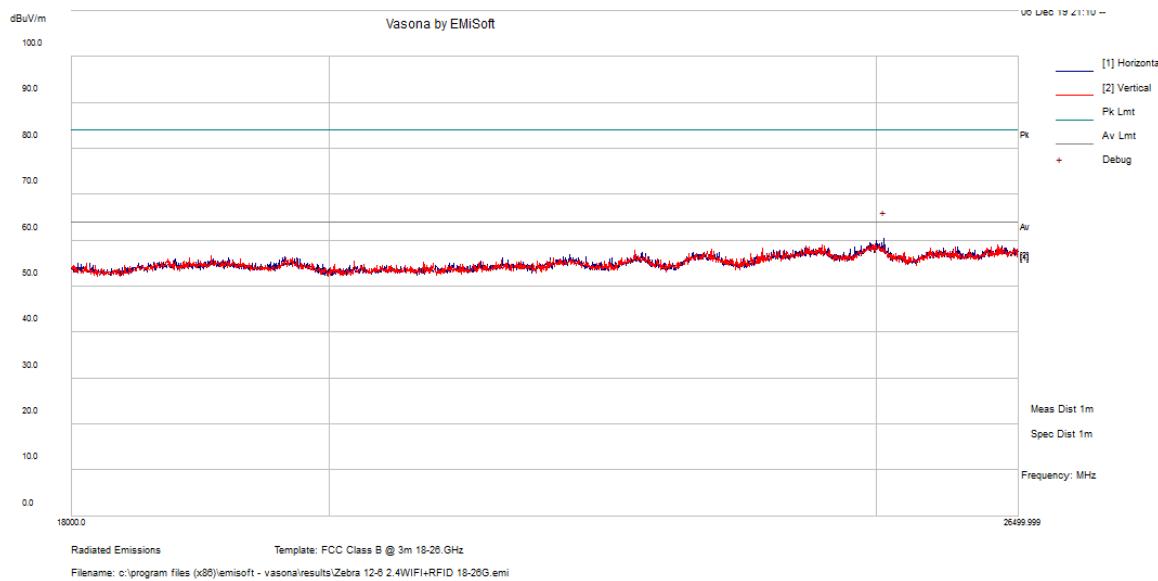
BLE + RFID Colocation

Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Detector (Peak /Avg.)
17137.25	63.45	H	200	0	64	-0.55	Peak*
10218.25	59.49	V	300	0	64	-4.51	Peak*
2402.5	51.58	H	200	0	64	-12.42	Peak*
3312	49.61	H	200	0	64	-14.39	Peak*
1493	46.8	H	100	0	64	-17.2	Peak*

Note*: Due to the testing value by using peak detector is within the average limit, no average detector testing is needed.

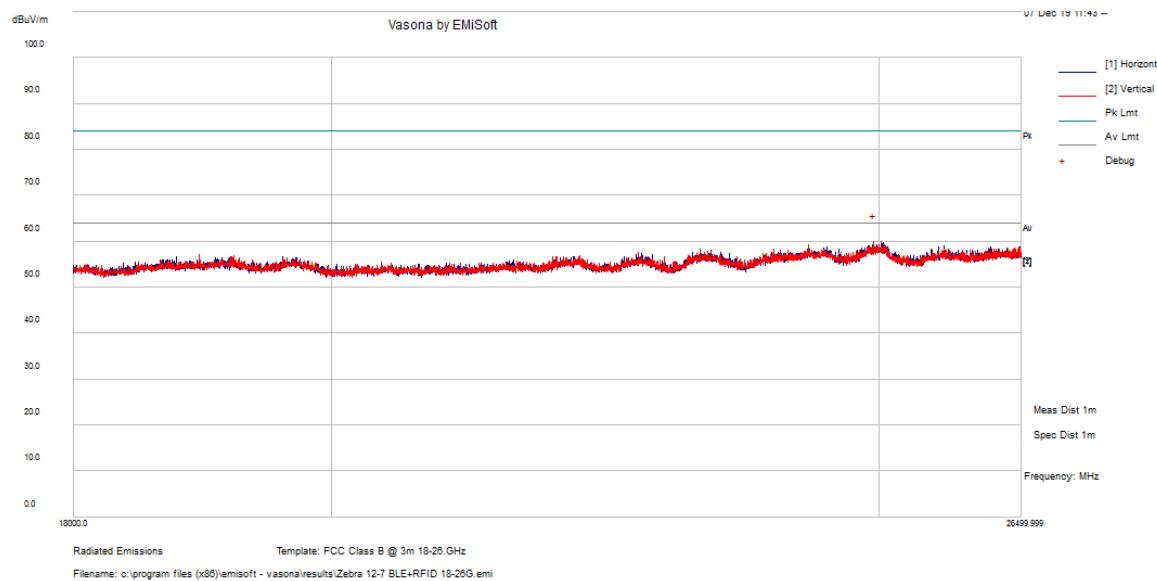
3) 18 - 26.5 GHz Worst Case, Measured at 1 meter

Wi-Fi + RFID Colocation



Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Detector (Peak /Avg.)
25084.75	60.52	H	300	0	64	-3.48	Peak*

Note*: Due to the testing value by using peak detector is within the average limit, no average detector testing is needed.

BLE + RFID Colocation

Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Detector (Peak /Avg.)
24953	60	V	200	0	64	-4	Peak*

Note*: Due to the testing value by using peak detector is within the average limit, no average detector testing is needed.

6 FCC §15.247(b) (3) & ISEDC RSS-247 §5.4 (d) - Output Power Measurement

6.1 Applicable Standards

According to ECFR §15.247(b) (3) and ISEDC RSS-247 §5.4 (d) for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

6.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 9: Fundamental emission output power

6.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
ETS- Lindgren	Power Sensor	7002-006	160097	2018-12-31	2 years
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

6.4 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Zhao Zhao on 2019-12-06 in RF site.

6.5 Test Results

Wi-Fi

Frequency (MHz)	Conducted Power (dBm)	Limit (dBm)	Margin (dB)
802.11b mode			
2412	16.01	30	-13.99
2437	15.95	30	-14.05
2462	15.55	30	-14.45
802.11g mode			
2412	13.48	30	-16.52
2437	13.43	30	-16.57
2462	13.11	30	-16.89
802.11n-HT20 mode			
2412	13.41	30	-16.59
2437	13.16	30	-16.84
2462	12.96	30	-17.04
802.11n-HT40 mode			
2422	12.74	30	-17.26
2437	12.70	30	-17.3
2452	12.57	30	-17.43

BLE

Channel	Frequency (MHz)	Conducted Power (dBm)	Limit (dBm)	Margin (dB)
Low	2402	8.51	30	-21.49
Middle	2440	8.40	30	-21.6
High	2480	8.12	30	-21.88

Note: Duty Cycle correction factor has already been added to the measurements

7 Annex A - EUT Test Setup Photographs

Please refer to the attachment

8 Annex B – EUT and Host Photographs

Please refer to the attachment

9 Annex C (Informative) - Manufacturer Declaration of Similarity

**ZEBRA**

Zebra Technologies Corporation
3 Overlook Point
Lincolnshire, IL 60069

p 847-634-6700
f 847-913-8766
zebra.com

January 20, 2020

Declaration of Similarity

To:

FEDERAL COMMUNICATIONS COMMISSIONS
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046, USA

Innovation, Science and Economic Development Canada
Certification and Engineering Bureau
P.O. Box 11490, Station 'H'
3701 Carling Ave., Building 94
Ottawa, Ontario K2H 8S2, Canada

Dear Sir or Madam:

We Zebra Technologies Corp. hereby declare that product: printer, models: ZQ521 and ZQ511 are electrically similar with the same electromagnetic emissions and electromagnetic compatibility characteristics. Both models were tested by BACL with some reductions of duplicated testing, based on the similarity.

A description of the differences between those two models is as follow:
The print heads are different sizes.

Please contact me should there be need for any additional clarification or information.

Best Regards,

A handwritten signature in blue ink, appearing to read "Charles A. Derrow".

Charles A. Derrow
Director of Compliance Engineering
3 Overlook Point, Lincolnshire, IL 60069 USA

10 Annex D (Normative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 General requirements for the competence of testing and calibration laboratories. This laboratory also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 2nd day of October 2018.

A handwritten signature in blue ink, appearing to read 'John'.

Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2020
Revised June 5, 2019

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---