

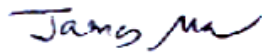
FCC PART 101 TYPE APPROVALS
EMI MEASUREMENT AND TEST REPORT

For

ComoTech Corporation

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812-1, Hyomun-Dong, Buk-Gu,
Ulsan City, 683-360 Korea

FCC ID: RL3ALTE1000

This Report Concerns: ☒ Class II Permissive Change Report (Rev.1.1)		Product type: Millimeter wave radio communication system
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Report Number:	S0602093 (Rev.1)	
Report Date:	2007-01-19	
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1 GENERAL INFORMATION

1.1 Product Description for Equipment under Test (EUT)

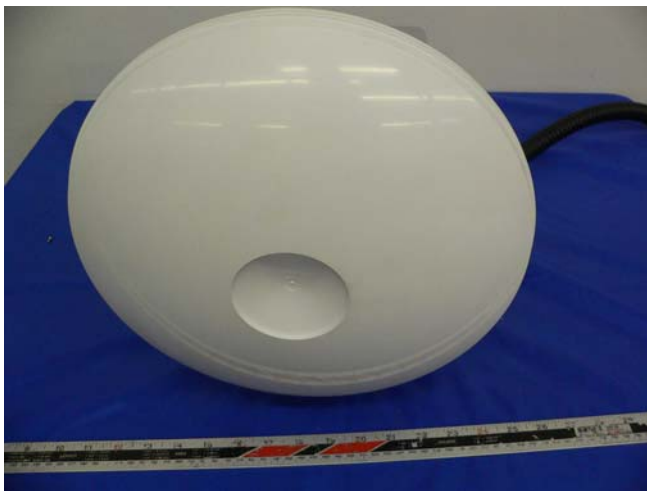
The ComoTech Corporation's product, FCC ID: RL3ALTE1000 or the "EUT" as referred to in this report is a Millimeter wave radio communication system, which measures approximately 30.48 cmL x 20.32 cmW x 30.48 cmH that operates at 72.1GHz for A unit and 74.9 GHz for B unit. This system supports the use of two different parabolic antennas; the first model being a 12" antenna with 43 dBi gain, and the second model being a 24" antenna with 51 dBi gain.

** The test data gathered are from typical production sample, serial number: S0520600016 for A unit and S0510600016 for B unit provided by the manufacturer.*

1.2 EUT Photo



EUT with 51 dBi 24" Antenna



EUT with 43 dBi 12" Antenna

1.3 Mechanical Description

The EUT is a device meant for permanent attachment that measures approximately 30.48 cmL x 20.32 cmW x 30.48 cmH and operates at 72.1 or 74.9 GHz.

1.4 Objective

This type approval report is prepared on behalf of *ComoTech Corporation* in accordance with Part 2, Subpart J, and Part 101 Subpart Q of the Federal Communication Commissions rules.

The objective of this Permissive change II is to add a new antenna with gain of 51dBi and determine continued compliance with FCC rules for RF output power, field strength of spurious radiation and RF Exposure (All tests required to verify continued compliance after implementation of PCII).

1.5 Related Submittal(s)/Grant(s)

For detailed information pertaining to original submission, tests, and data therein, please refer to BACL ComoTech project R0512154.

1.6 Test Methodology

All tests and measurements indicated in this document were performed in accordance with the Code of Federal Regulations Title 47 Part 2, Sub-part J as well as the following parts:

Part 101 Subpart Q SERVICE AND TECHNICAL RULES FOR THE 70/80/90 GHZ BANDS

Applicable Standards: TIA603-C.

All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratory, Corp. The radiated testing was performed at an antenna-to-EUT distance of 3 or 1 meters.

1.7 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.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the values ranging from ± 2.0 dB for Conducted Emissions tests and ± 4.0 dB for Radiated Emissions tests are the most accurate estimates pertaining to uncertainty of EMC measurements at BACL Corp.

Detailed instrumentation measurement uncertainties can be found in BACL Corp. report QAP-018.

1.8 Test Facility

The test site used by BACL Corp. to collect radiated and conducted emissions measurement data is located at its facility in Sunnyvale, California, USA.

The test site at BACL Corp. has been fully described in reports submitted to the Federal Communication Commission (FCC) and Voluntary Control Council for Interference (VCCI). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on February 11, 1997 and December 10, 1997 and Article 8 of the VCCI regulations on December 25, 1997. The facility also complies with the test methods and procedures set forth in ANSI C63.4-2003 & TIA/EIA-603.

The Federal Communications Commission and Voluntary Control Council for Interference have the reports on file and they are listed under FCC registration number: 90464 and VCCI Registration No.: R-2463 and C-2698. The test site has been approved by the FCC and VCCI for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, BACL Corp. is a National Institute of Standards and Technology (NIST) accredited laboratory under the National Voluntary Laboratory Accredited Program (Lab Code 200167-0). The current scope of accreditations can be found at <http://ts.nist.gov/ts/htdocs/210/214/scopes/2001670.htm>.

2 SYSTEM TEST CONFIGURATION

2.1 Justification

The EUT was configured for testing according to TIA/EIA-603-C.

The final qualification test was performed with the EUT operating at normal mode.

2.2 Equipment Modifications

No modifications were made to the EUT.

2.3 Local Support Equipment List and Details

Manufacturer	Description	Model	Serial Number
MultiNet	Media Converter	OMC-1000M	OMC07011602

2.4 Power Supply Information

Manufacturer	Description	Model	Serial Number
KK Precision	DC Power Supply	1740	26502000233

2.5 Interface Ports and Cabling

Cable Description	Length (M)	From	To
Optical, Fiber cable	2.0	Media Converter	EUT

3 SUMMARY OF TEST RESULTS

Results reported relate only to the product tested.

FCC RULES	DESCRIPTION OF TEST	RESULT
§ 2.1047 § 101.141	Modulation Characteristics	NA
§ 2.1053 § 101.111	Field Strength of Spurious Radiation	Compliant
§ 2.1091 § 101.1525	RF Exposure	Compliant
§ 2.1046, § 101.113	RF Output Power	Compliant
§ 2.1049 § 101.109	Occupied Bandwidth	Compliant
§ 2.1055 (a) § 2.1055 (d) § 101.107	Frequency stability vs. temperature Frequency stability vs. voltage	NA

* Please refer to BACL's project # R0512154 for complete test data and photos pertaining to the original Comotech submission.

4 §2.1047 §101.141 – MODULATION CHARACTERISTIC

4.1 Applicable Standard

Requirement: FCC § 2.1047(d). As Part 101.141, there is no requirement for transmitters operating at 70 GHz.

5 §2.1053 / §101.111- HARMONIC & SPURIOUS EMISSIONS

5.1 Applicable Standard

Requirements: CFR 47, § 2.1053 / §101.111 (2) (ii)

For operating frequencies above 15 GHz, In any 1 MHz band, the center frequency of which is removed from the assigned frequency by more than 250 percent of the authorized bandwidth: At least $43 + 10 \log_{10}$ (the mean output power in watts) decibels, or 80 decibels, whichever is the lesser attenuation. The authorized bandwidth includes the nominal radio frequency bandwidth of an individual transmitter/modulator in block-assigned bands. Equipment licensed prior to April 1, 2005 shall only be required to meet this standard in any 4 kHz band.

For EIRP=60dBm , which is equivalent = 164.77 dBμV/m @ 1 meter or 155.23 dBμV/m @ 3 meter.

$A = 43 + 30 \text{ dBW} = 73 \text{ dBc}$.

Emission Limit = 91.77 dBμV/m @ 1 meter or 82.23 dBμV/m.@ 3 meter

5.2 Test Procedure

The transmitter was placed on a wooden turntable, and it was transmitting into antenna which was also placed on the turntable.

The measurement antenna was placed at a distance of 1 or 3 meters from the EUT. During the tests, the antenna height and polarization as well as EUT azimuth were varied in order to identify the maximum level of emissions from the EUT. The test was performed by placing the EUT on 3-orthogonal axis.

The frequency range up 200 GHz.

5.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Cal. Date
OML	WR-12 harmonic Mixer with Horn antenna	M12HW/A	E60120-1	2006-01-23
OML	WR-05 Harmonic Mixer with Horn Antenna	M05HW/A	G60106-1	2006-01-23
OML	WR-03 Harmonic Mixer with Horn Antenna	M03HWD	H60120-1	2006-01-23
OML	Diplexer for Agilent Spectrum Analyzer	DPL26	N/A	N/A
HP	Pre, Amplifier (1 ~ 26.5 GHz)	8449B	3147A00400	2005-10-05
Agilent	Analyzer, Spectrum	E4446A	US44300386	2005-11-10
A. H. Systems	Antenna, Horn, DRG	SAS-200/571	261	2005-04-20

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

5.4 Environmental Conditions

Temperature:	18° C
Relative Humidity:	55%
ATM Pressure:	1020mbar

* The testing was performed by Snell Leong on 2006-02-08.

5.5 Test Result (for 51 dBi antenna)

Worst case reading as follows:

-20.7 dB at 149800 MHz (74.9GHz)

Final scan 1GHz -200GHz , Fundamental = 74.9 GHz)

Frequency MHz	Reading dBμV	Direction Degree	Height Meter	Polar H / V	Antenna Loss dB	Cable loss dB	Amplifier dB	Distance Factor dB	Correction Factor dBμV/m	101.111 Limit (dBμV/m)	Margin dB
1947.50	59.6	270	2.4	V	24.8	1.9	36.3	10.0	39.9	91.77	-51.9
1947.50	54.2	180	2.2	H	24.8	1.9	36.3	10.0	34.5	91.77	-57.3
2071.30	63.7	270	2.4	V	28.7	2.0	35.8	10.0	48.5	91.77	-43.3
2071.30	54.3	180	2.2	H	28.7	2.0	35.8	10.0	39.1	91.77	-52.7
4142.70	49.9	270	2.4	V	31.8	2.9	34.7	10.0	39.9	91.77	-51.9
4142.70	44.6	180	2.2	H	31.8	2.9	34.7	10.0	34.6	91.77	-57.2
149800.00	67.8	0	1.5	V	24.0	8.8	0.0	29.5	71.1	91.77	-20.7
149800.00	63.4	0	1.5	H	24.0	8.8	0.0	29.5	66.7	91.77	-25.1

Note: For Freq. 149.8 GHz measured at distance 10 cm.

5.6 Radiated Emissions Test Data for 12" 43 dBi Antenna (for reference purposes)**5.7 Environmental Conditions**

Temperature:	18° C
Relative Humidity:	55%
ATM Pressure:	1020mbar

* The testing was performed by Snell Leong on 2006-01 -26.

5.8 Test Result: 43 dBi antenna

Worst case reading as follows:
-21.7 dB at 149800MHz

Final scan 1GHz -200GHz, Fundamental = 74.9 GHz)

Frequency MHz	Reading dBuV	Direction Degree	Height Meter	Polar H / V	Antenna Loss dB	Cable loss dB	Amplifier dB	Distance Factor dB	Correction Factor dBuV/m	101.111 Limit (dBuV/m)	Margin dB
1947.50	58.1	270	2.4	V	24.8	1.9	36.3	10.0	38.4	91.77	-53.4
1947.50	51.3	180	2.2	H	24.8	1.9	36.3	10.0	31.6	91.77	-60.2
2071.30	60.3	270	2.4	V	28.7	2.0	35.8	10.0	45.1	91.77	-46.7
2071.30	51.2	180	2.2	H	28.7	2.0	35.8	10.0	36.0	91.77	-55.8
4142.70	47.8	270	2.4	V	31.8	2.9	34.7	10.0	37.8	91.77	-54.0
4142.70	42.1	180	2.2	H	31.8	2.9	34.7	10.0	32.1	91.77	-59.7
149800.00	66.8	0	1.5	V	24.0	8.8	0.0	29.5	70.1	91.77	-21.7
149800.00	61.1	0	1.5	H	24.0	8.8	0.0	29.5	64.4	91.77	-27.4

6 §1.1307(b) (1), §2.1091 & 101.1525 - RF EXPOSURE

According to §1.1310 and §2.1091 RF exposure is calculated.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minute)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	30
1.34-30	824/f	2.19/f	*(180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

MPE Prediction

Predication of MPE limit at a given distance

Equation from page 18 of OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

51 dBi Antenna:

Maximum peak output power at antenna input terminal: 9 (dBm)

Maximum peak output power at antenna input terminal: 7.9(mW)

Prediction distance: 300 (cm)

Predication frequency: 72100 (MHz)

Antenna Gain (typical): 51 (dBi)

Antenna gain: 125892.5 (numeric)

Power density at predication frequency at 300 cm: 0.880 (mW/cm²)

MPE limit for uncontrolled exposure at prediction frequency: 1 (mW/cm²)

43 dBi Antenna:

Maximum peak output power at antenna input terminal: 9 (dBm)

Maximum peak output power at antenna input terminal: 7.9(mW)

Prediction distance: 120 (cm)

Predication frequency: 71500 (MHz)

Antenna Gain (typical): 43 (dBi)

Antenna gain: 19952.6 (numeric)

Power density at predication frequency at 120 cm: 0.871 (mW/cm²)

MPE limit for uncontrolled exposure at prediction frequency: 1 (mW/cm²)

6.1 Test Result

The EUT is a mobile device. The power density level at 300 cm (51 dBi antenna) is 0.879 mW/cm² and the power density level at 120 cm (43 dBi antenna) is 0.871 mW/cm², both of which are below the uncontrolled exposure limit of 1 mW/cm².

7 §2.1046, §101.113 – Transmitter Power Limitation

7.1 Applicable Standard

Maximum allowable EIRP \1\ \2\		
Frequency band (MHz)	Fixed \1\, \2\ (dBW)	Mobile (dBW)
928.0-929.0(2).....	+17	
932.0-932.5(2).....	+17	
932.5-935.0.....	+40	
941.0-941.5(2).....	+30	+14
941.5-944.0.....	+40	
952.0-960.0(2).....	+40	+14
1,850-1,990.....	+45	
2,110-2,150.....	+45	
2,150-2,180 \3\.....	+45	
2,180-2,200.....	+45	
2,450-2,500.....	+45	
2,500-2,686.....		
2,686-2,690.....	+45	
3,700-4,200.....	+55	
5,925-6,425.....	+55	
6,425-6,525.....		+35
6,525-6,875.....	+55	
10,550 to 10,600 5.....	+55	
10,600 to 10,680 5.....	+40	
10,700-11,700.....	+55	
12,200-12,700 \11\.....	+50	
12,700-13,200 \4\.....	+50	
13,200-13,250 \4\.....	+55	
14,200-14,400 \12\.....	+45	
17,700-18,600.....	+55	
18,600-18,800 \6\.....	+35	
18,800-19,700.....	\5\ +55	
21,200-23,600 \10\.....	+55	
24,250-25,250.....	\5\ +55	
27,500-28,350 \9\.....	+55	
29,100-29,250.....	(\7\)	
31,000 to 31,075 8, 9.....	30 dBW/MHz	30 dBW/MHz
31,075 to 31,225 8, 9.....	30 dBW/MHz	30 dBW/MHz
31,225 to 31,300 8, 9.....	30 dBW/MHz	30 dBW/MHz
38,600-40,000.....	+55	
92,000-95,000.....	+55	+55

7.2 Test Procedure

Conducted:

The RF output of the transmitter was connected to the spectrum analyzer through sufficient attenuation.

7.3 Test Equipment List and Details

Manufacturer	Description	Serial Number	Model	Cal. Date
OML	WR-12 harmonic Mixer with Horn antenna	E60120-1	M12HW/A	2006-01-23
OML	Diplexer for Agilent Spectrum Analyzer	N/A	DPL26	N/A
Agilent	Analyzer, Spectrum	US44300386	E4446A	2006-03-06

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

7.4 Environmental Conditions

Temperature:	19° C
Relative Humidity:	58%
ATM Pressure:	1018mbar

** The testing was performed by Snell Leong on 2006-01-26.*

7.5 Test Results

43 dBi Antenna:

Frequency (GHz)	Reading (dBm)	Mixer Conversion Factor (dB)	Corrected Conducted Power (dBm)	Antenna Gain (dBi)	EIRP (dBm)	EIRP (dBW)	§101.113 limit (dBW)	Margin (dB)	Comments
72.1000	-38.5	47.5	9	43.0	52.0	22.0	55	-33.0	Fund/Peak
74.9000	-38.7	47.5	8.8	43.0	51.8	21.8	55	-33.2	Fund/Peak

51 dBi Antenna:

Frequency (GHz)	Reading (dBm)	Mixer Conversion Factor (dB)	Corrected Conducted Power (dBm)	Antenna Gain (dBi)	EIRP (dBm)	EIRP (dBW)	§101.113 Limit (dBW)	Margin (dB)	Comments
72.1000	-38.5	47.5	9	51	60.0	22.0	55	-25.0	Fund/Peak
74.9000	-38.7	47.5	8.8	51	59.8	21.8	55	-25.2	Fund/Peak

8 §2.1049 & §101.109- OCCUPIED BANDWIDTH

8.1 Applicable Standard

Frequency band (MHz)	Maximum authorized bandwidth
928 to 929.....	25 kHz 1 5 6
932 to 932.5, 941 to 941.5.....	12.5 kHz 1 5 6
932.5 to 935, 941.5 to 944.....	200 kHz \1\
952 to 960.....	200 KHz 1 5 6
1,850 to 1,990.....	10 MHz \1\
2,110 to 2,130.....	3.5 MHz
2,130 to 2,150.....	800 or 1600 KHz \1\
2,150 to 2,160.....	10 MHz
2,160 to 2,180.....	3.5 MHz
2,180 to 2,200.....	800 or 1600 KHz \1\
2,450 to 2,483.5.....	625 KHz \2\
2,483.5 to 2,500.....	800 KHz
3,700 to 4,200.....	20 MHz
5,925 to 6,425.....	30 MHz \1\
6,425 to 6,525.....	25 MHz
6,525 to 6,875.....	10 MHz \1\
10,550 to 10,680.....	5 MHz \1\
10,700 to 11,700.....	40 MHz \1\
12,200 to 12,700\8\.....	500 megahertz
13,200 to 13,250.....	25 MHz
17,700 to 18,140.....	220 MHz \1\
18,140 to 18,142.....	2 MHz
18,142 to 18,580.....	6 MHz
18,580 to 18,820.....	20 MHz \1\
18,820 to 18,920.....	10 MHz
18,920 to 19,160.....	20 MHz \1\
19,160 to 19,260.....	10 MHz
19,260 to 19,700.....	220 MHz \1\
21,200 to 23,600.....	50 MHz \1\ \4\
24,250 to 25,250.....	40 MHz \7\
27,500 to 28,350.....	850 MHz
29,100 to 29,250.....	150 MHz
31,000 to 31,075.....	75 MHz
31,075 to 31,225.....	150 MHz
31,225 to 31,300.....	75 MHz
38,600 to 40,000.....	50 MHz \7\
71,000 to 76,000.....	5000 MHz
81,000 to 86,000.....	5000 MHz
92,000 to 95,000.....	(3\)

8.2 Test Procedure

The RF output of the transmitter was connected to the spectrum analyzer through sufficient attenuation.

The resolution bandwidth of the spectrum analyzer was set at 1 MHz and the 26 dB Bandwidth was recorded.

8.3 Test Equipment List and Details

Manufacturer	Description	Serial Number	Model	Cal. Date
OML	WR-12 harmonic Mixer with Horn antenna	E60120-1	M12HW/A	2006-01-23
OML	Diplexer for Agilent Spectrum Analyzer	N/A	DPL26	N/A
Agilent	Analyzer, Spectrum	US44300386	E4446A	2006-03-06

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

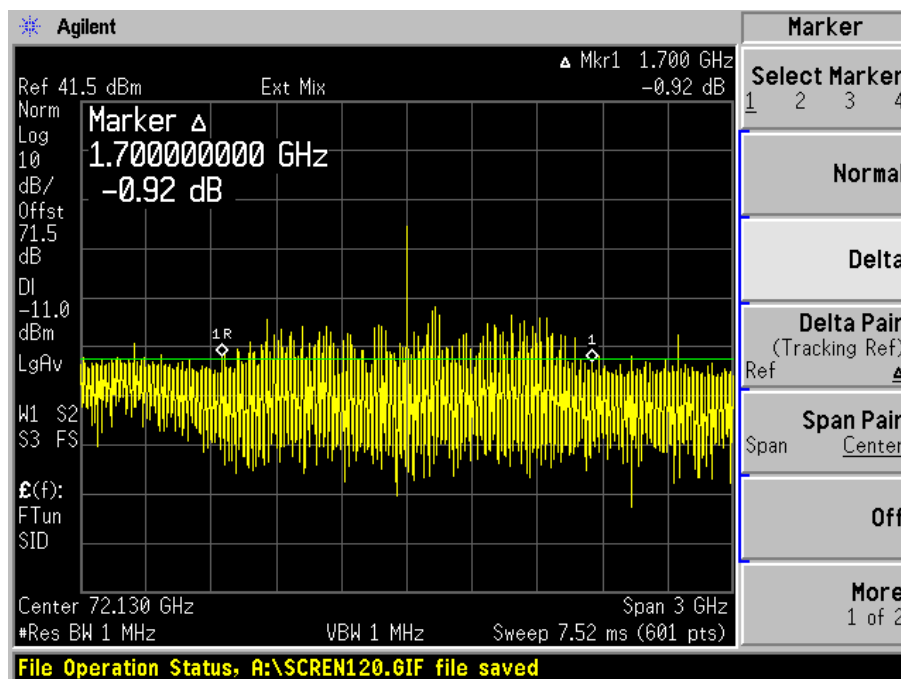
8.4 Environmental Conditions

Temperature:	19° C
Relative Humidity:	58%
ATM Pressure:	1018 mbar

** The testing was performed by James Ma on 2007-01-19.*

8.5 Test Results

Please refer to the following plots.

Plots of 26 dB Bandwidth for 72.13 GHz Transmitter*Plots of 26 dB Bandwidth for 74.9 GHz Transmitter*