

## ELECTROMAGNETIC EMISSIONS COMPLIANCE REPORT

**Applicant:** Seiko Epson Corporation  
6925 Tazawa, Toyoshina, Azumino-shi, Nagano, 399-8285 Japan

**Product Name:** Intelligent Controller

**Brand Name:** EPSON

**Model No.:** BO-IC400

**Model Difference:** N/A

**Report Number:** E2/2020/50086

**FCC ID:** SKSBO-IC400

**FCC Rule Part:** §15.407, Cat: NII

**Issue Date:** Jul. 10, 2020

**Date of Test:** May 29, 2020 ~ Jul. 03, 2020

**Date of EUT Received:** May 29, 2020

**We hereby certify that:**

The above equipment was tested by SGS Taiwan Ltd. Central RF Lab. The test data, data evaluation, test procedures, and equipment configurations shown in this report were made in accordance with the procedures given in ANSI C63.10: 2013 and the energy emitted by the sample EUT tested as described in this report is in compliance with conducted and radiated emission limits.

The test results of this report relate only to the tested sample identified in this report.

Approved By: \_\_\_\_\_

Jazz Huang

Jazz Huang / Asst. Supervisor



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## Revision History

Report Number	Revision	Description	Issue Date	Remark
E2/2020/50086	Rev.00	Original.	Jul. 10, 2020	Revised By: Yuri Tsai

### Note:

#### 1、Disclaimer

Antenna information is provided by the applicant, test results of this report are applicable to the sample EUT received.

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## 1 GENERAL INFORMATION

### 1.1 Product Description

Product Name:	Intelligent Controller	
Brand Name:	EPSON	
Model No.:	BO-IC400	
Model Difference:	N/A	
Hardware Version:	DVT	
Software Version:	Android 9	
Power Supply:	3.85Vdc from Rechargeable Li-ion Battery or 5Vdc from Micro USB port	
	Battery:	Battery:
Modulation type	64QAM, 16QAM, QPSK, BPSK for OFDM 256QAM for OFDM in 802.11ac only	
Transition Rate	802.11 a: 6/9/12/18/24/36/48/54 Mbps 802.11 n_20MHz: 6.5 – 144.4Mbps 802.11 n_40MHz: 13.5 – 300.0Mbps	802.11 ac_20MHz: 6.5 – 173.3Mbps 802.11 ac_40MHz: 13.5 – 400.0Mbps 802.11 ac_80MHz: 29.3 – 866.7Mbps 802.11 ac_160MHz: 58.5 – 1733.4Mbps

### 1.2 Antenna Designation

Antenna Type	Supplier	Antenna Part No.	Freq. (MHz)	Peak Antenna Gain (dBi)	Worst Antenna Gain
PIFA	PEGATRON	K1606-00028F1BS1	5150~5250	1.7 (Main)	
			5250~5350	2 (Main)	
			5470~5725	1.9 (Main)	
			5725~5850	0.8 (Main)	
		K1606-00029E1BS1	5150~5250	3.3 (Aux)	V
			5250~5350	3.3 (Aux)	V
			5470~5725	3.5 (Aux)	V
			5725~5850	1.8 (Aux)	V
Note: Pre-scanned was done on the above 2 antennas, the Aux antenna results higher emission at 5GHz. Therefore, the completed set of measurement was done on the antenna to be presented on this test report.					

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### 1.3 FCC worst power

Wi-Fi 802.11	Frequency Range	Channels	Rated Power (Avg.) (dBm) (Worst case)		Modulation Technology
a	5180~5240	4	15.84		OFDM
	5260~5320	4	15.73		
	5500~5700	12	15.9		
	5745-5825	5	15.88		
n_HT ac_VHT 20M	5180~5240	4	HT	15.41	OFDM
	5260~5320	4	HT	15.37	
	5500~5700	12	HT	15.39	
	5745-5825	5	HT	15.42	
n_HT ac_VHT 40M	5190~5230	2	HT	15.47	OFDM
	5270~5310	2	HT	15.47	
	5510~5670	5	HT	15.33	
	5755-5795	2	HT	15.23	
ac_VHT 80M	5210	1	HT	15.23	OFDM
	5290	1	HT	15.35	
	5530~5610	2	HT	15.79	
	5775	1	HT	15.60	

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#### 1.4 Test Methodology of Applied Standards

FCC Part 15, Subpart E §15.407

FCC KDB 905462 D02 UNII DFS Compliance Procedures New Rules v02

FCC KDB 905462 D03 UNII Clients Without Radar Detection New Rules v01r02

#### 1.5 Test Facility

SGS Taiwan Ltd. Central RF Lab (TAF code 3702)

No.2, Keji 1st Rd., Guishan District, Taoyuan City, Taiwan 333

FCC Designation number: TW0028

#### 1.6 Special Accessories

There are no special accessories used while test was conducted.

#### 1.7 Equipment Modifications

There was no modification incorporated into the EUT.

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## 2 SUMMARY OF TEST RESULT

FCC / IC Rules	IC Rules	Description Of Test	Result
§15.407(h)	IC RSS-247 issue 1 §6.3	TPC and DFS Measurement	Compliant

## 3 MEASUREMENT UNCERTAINTY

Test Items	Uncertainty
TPC and DFS Measurement	+/- 123.36 Hz
Temperature	+/- 0.65 °C
Humidity	+/- 4.6 %
DC / AC Power Source	DC= +/- 0.13%, AC=+/- 0.2%

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

The conformity assessment statement in this report is based solely on the test results, measurement uncertainty is excluded.

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## 4 TPC AND DFS MEASUREMENT

### 4.1 TPC: Standard Applicable

According to §15.407(h)(1), Transmit power control (TPC). U-NII devices operating in the 5.25-5.35 GHz band and the 5.47-5.725 GHz band shall employ a TPC mechanism. The U-NII device is required to have the capability to operate at least 6 dB below the mean EIRP value of 30 dBm. A TPC mechanism is not required for systems with an e.i.r.p. of less than 500 mW.

Result: N/A, The output power is less than 500mW.

### 4.2 DFS: Standard Applicable

According to §15.407(h)(2) and FCC KDB 905462 D02 , Radar Detection Function of Dynamic Frequency Selection (DFS).

Radar Detection Function of Dynamic Frequency Selection (DFS). U-NII devices operating with any part of its 26 dB emission bandwidth in the 5.25-5.35 GHz and 5.47-5.725 GHz bands shall employ a DFS radar detection mechanism to detect the presence of radar systems and to avoid co-channel operation with radar systems. Operators shall only use equipment with a DFS mechanism that is turned on when operating in these bands. The device must sense for radar signals at 100 percent of its emission bandwidth. The minimum DFS detection threshold for devices with a maximum e.i.r.p. of 200 mW to 1 W is -64 dBm. For devices that operate with less than 200 mW e.i.r.p. and a power spectral density of less than 10 dBm in a 1 MHz band, the minimum detection threshold is -62 dBm. The detection threshold is the received power averaged over 1 microsecond referenced to a 0 dBi antenna. For the initial channel setting, the manufacturers shall be permitted to provide for either random channel selection or manual channel selection.

(i) Operational Modes. The DFS requirement applies to the following operational modes:

- (a) The requirement for channel availability check time applies in the master operational mode.
- (b) The requirement for channel move time applies in both the master and slave operational modes.

(ii) Channel Availability Check Time. A U-NII device shall check if there is a radar system already operating on the channel before it can initiate a transmission on a channel and when it has to move to a new channel. The U-NII device may start using the channel if no radar signal with a power level greater than the interference threshold values listed in paragraph (h)(2) of this section, is detected within 60 seconds.

(iii) Channel Move Time. After a radar's presence is detected, all transmissions shall cease on the operating channel within 10 seconds. Transmissions during this period shall consist of normal traffic for a maximum of 200 ms after detection of the radar signal. In addition, intermittent management and control signals can be sent during the remaining time to facilitate vacating the operating channel.

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- (iv) Non-occupancy Period. A channel that has been flagged as containing a radar system, either by a channel availability check or in-service monitoring, is subject to a non-occupancy period of at least 30 minutes. The non-occupancy period starts at the time when the radar system is detected.

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#### 4.2.1 Limit

**Table 1: Applicability of DFS requirements prior to use of a channel**

Requirement	Operational Mode		
	Master	Client(without radar detection)	Client(with radar detection)
Non-occupancy Period	Yes	Not required	Yes
DFS Detection Threshold	Yes	Not required	Yes
Channel Availability Check Time	Yes	Not required	Not required
U-NII Detection Bandwidth	Yes	Not required	Yes

**Table 2: Applicability of DFS requirements during normal operation**

Requirement	Operational Mode	
	Master Device or Client with Radar Detection	Client Without Radar Detection
DFS Detection Threshold	Yes	Not required
Channel Closing Transmission time	Yes	Yes
Channel Move time	Yes	Yes
U-NII Detection Bandwidth	Yes	Not required

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Additional requirements for devices with multiple bandwidth mode	Master Device or Client with Radar Detection	Client Without Radar Detection
U-NII Detection Bandwidth and Statistical Performance Check	All BW modes must be tested	Not required
Channel Move Time and Channel Closing Transmission Time	Test using widest BW mode available	Test using the widest BW mode available for the link
All other tests	Any single BW mode	Not required
<b>Note:</b> Frequencies selected for statistical performance check (Section 7.8.4) should include several frequencies within the radar detection bandwidth and frequencies near the edge of the radar detection bandwidth. For 802.11 devices it is suggested to select frequencies in each of the bonded 20 MHz channels and the channel center frequency.		

**Table 3: Interference Threshold values, Master or Client incorporating In-Service Monitoring**

Maximum Transmit Power	Value (See Notes 1, 2, and 3)
EIRP $\geq$ 200 milliwatt	-64 dBm
EIRP < 200 milliwatt and power spectral density < 10 dBm/MHz	-62 dBm
EIRP < 200 milliwatt that do not meet the power spectral density requirement	-64 dBm
Note 1: This is the level at the input of the receiver assuming a 0 dBi receive antenna. Note 2: Throughout these test procedures an additional 1 dB has been added to the amplitude of the test transmission waveforms to account for variations in measurement equipment. This will ensure that the test signal is at or above the detection threshold level to trigger a DFS response. Note3: EIRP is based on the highest antenna gain. For MIMO devices refer to KDB Publication 662911 D01.	

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Table 4: DFS Response requirement values

Parameter	Value
<i>Non-occupancy period</i>	Minimum 30 minutes
<i>Channel Availability Check Time</i>	60 seconds
<i>Channel Move Time</i>	10 seconds See Note 1.
<i>Channel Closing Transmission Time</i>	200 milliseconds + an aggregate of 60 milliseconds over remaining 10 second period. See Notes 1 and 2.
<i>U-NII Detection Bandwidth</i>	Minimum 100% of the U-NII 99% transmission power bandwidth. See Note 3.
<p><b>Note 1:</b> <i>Channel Move Time</i> and the <i>Channel Closing Transmission Time</i> should be performed with Radar Type 0. The measurement timing begins at the end of the Radar Type 0 burst.</p> <p><b>Note 2:</b> The <i>Channel Closing Transmission Time</i> is comprised of 200 milliseconds starting at the beginning of the <i>Channel Move Time</i> plus any additional intermittent control signals required to facilitate a <i>Channel</i> move (an aggregate of 60 milliseconds) during the remainder of the 10 second period. The aggregate duration of control signals will not count quiet periods in between transmissions.</p> <p><b>Note 3:</b> During the <i>U-NII Detection Bandwidth</i> detection test, radar type 0 should be used. For each frequency step the minimum percentage of detection is 90 percent. Measurements are performed with no data traffic.</p>	

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Table 5: Radar Test Waveforms

## Short Pulse Radar

Radar Type	Pulse Width (μsec)	PRI (μsec)	Number of Pulses	Minimum Percentage of Successful Detection	Minimum Number of Trials
0	1	1428	18	See Note 1	See Note 1
1	1	Test A: 15 unique PRI values randomly selected from the list of 23 PRI values in Table 5a Test B: 15 unique PRI values randomly selected within the range of 518-3066 μsec, with a minimum increment of 1 μsec, excluding PRI values selected in Test A	$\text{Roundup} \left\{ \left( \frac{1}{360} \right) \cdot \left( \frac{19 \cdot 10^6}{\text{PRI}_{\mu\text{SEC}}} \right) \right\}$	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>Note 1:</b> Short Pulse Radar Type 0 should be used for the detection bandwidth test, channel move time, and channel closing time tests.					

## Long Pulse Radar

Radar Type	Pulse Width (μsec)	Chirp Width (MHz)	PRI (μsec)	Number of Pulses per Burst	Number of Bursts	Minimum Percentage of Successful Detection	Minimum Number of Trials
5	50-100	5-20	1000-2000	1-3	8-20	80%	30

## Frequency Hopping Radar

Radar Type	Pulse Width (μsec)	PRI (μsec)	Pulses per Hop	Hopping Rate (kHz)	Hopping Sequence Length (msec)	Minimum Percentage of Successful Detection	Minimum Number of Trials
6	1	333	9	0.333	300	70%	30

**The applicant of this given application confirms that information regarding the parameters of the detected Radar Waveforms is not available to the end user.**

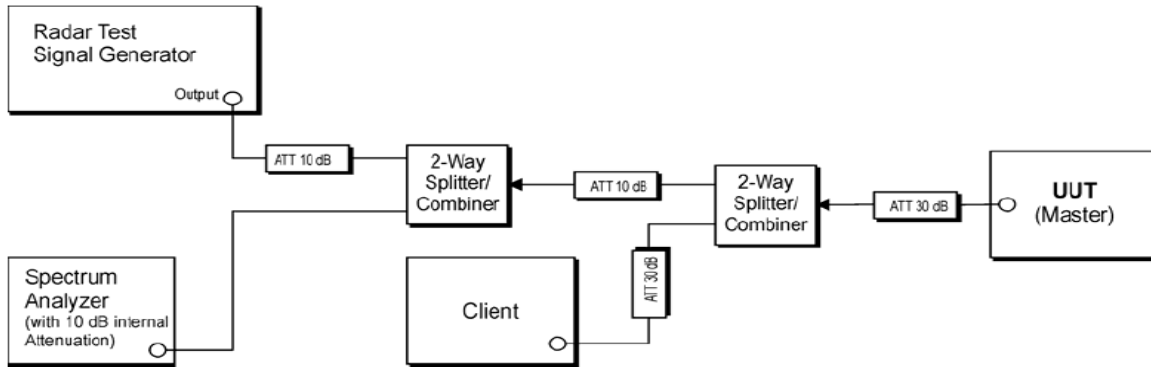
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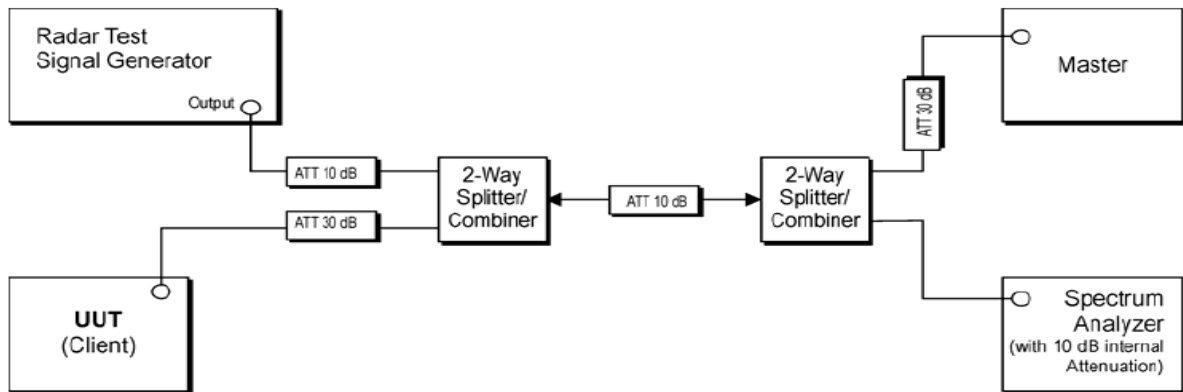
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## 4.2.2 Test Setup

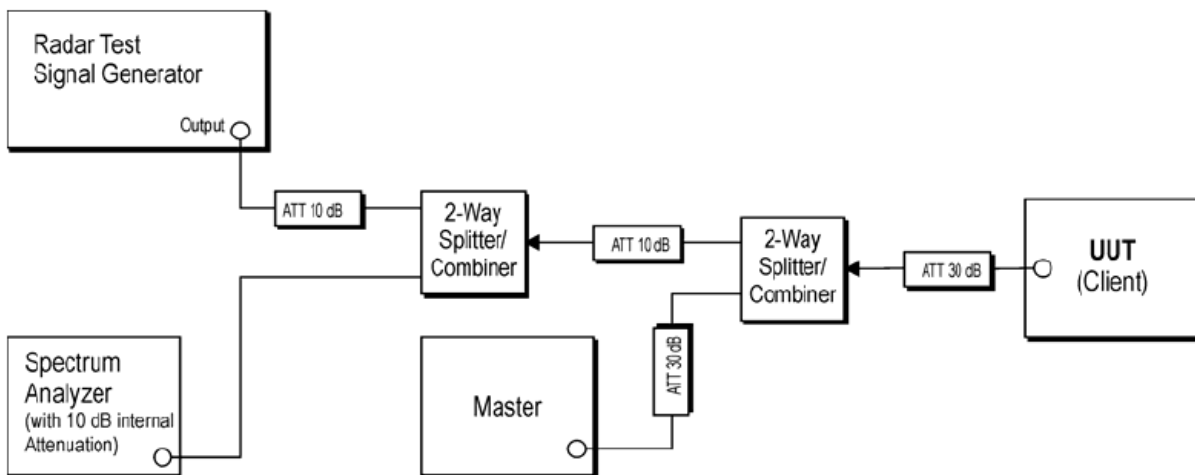
### Setup for Master with injection at the Master



### Setup for Client with injection at the Master



### Setup for Client with injection at the Client



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#### 4.2.3 Test Equipment Used:

Conducted Emission Test Site					
EQUIPMENT TYPE	MFR	MODEL NUMBER	SERIAL NUMBER	LAST CAL.	CAL DUE.
EMI Receiver	KEYSIGHT	N9038A	MY52260216	11/28/2019	11/27/2020
Signal Generator	Keysight	N5182B	MY56200007	08/11/2019	08/10/2020
Splitter	RF-LAMBAD	RFLT4W1G18 G	SPCD10-004	01/02/2020	01/01/2021
Splitter	RF-LAMBAD	RFLT2W1G18 G	11-JSPF412-0 20	01/02/2020	01/01/2021
Splitter	RF-LAMBAD	RFLT2W1G18 G	11-JSPF412-0 17	01/02/2020	01/01/2021
Attenuator	Agilent	8495B	3308A22470	01/02/2020	01/01/2021
Attenuator	HP	8494B	2812A170605	01/02/2020	01/01/2021
Accece Ponit	ASUS	RT-AX88U	FCC ID :MSQ-RTA XHP00 IC : 3568A-RTAX HP00 CAN IC- ES-3(B)/NMB- 3(B)	N/A	N/A

#### 4.2.4 Description of EUT:

EUT operates over the 5250-5350MHz and 5470-5725MHz ranges and EUT is a slave device (client equipment) w/o radar detection and DFS capability.

EUT has no TPC mechanism implemented with no adjustment of lowest, and highest power, but the level of power emission stays at fixed level.

WLAN traffic is generated by streaming the mpeg file from the master to slave in full monitor video mode using the media player.

The rated output power of the master unit is >23dBm(EIRP).therefore the required interference threshold level is -64dBm.after correction for antenna gain and procedural adjustments, the required conducted threshold at the antenna port is -64dBm.

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While calibrate the path on antenna port of DFS test equipment (master), measurements equipments (spectrum) is ensured to be 50 Ohms, and therefore verification on antenna gain measurement can be ignored.

Conducted test was performed with appropriate adjustment, and calibration to ensure power from DFS simulator injects to antenna port of DFS test equipment (DFS) is -64dBm

### Message or files that is used for communication between Master and Client:

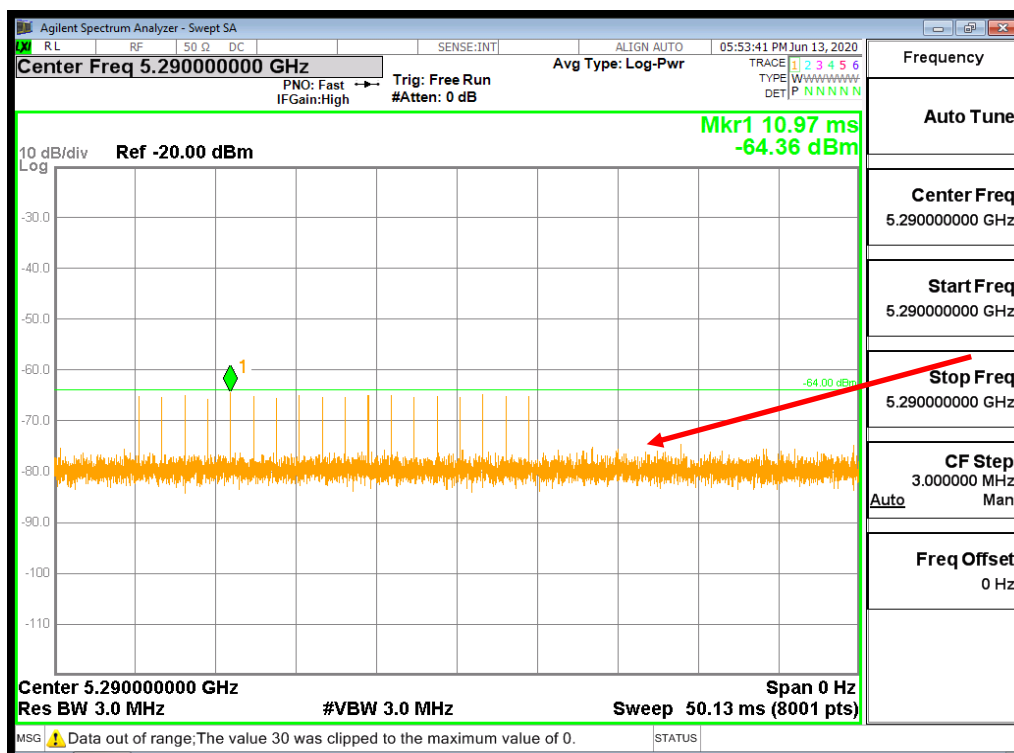
IP based system:

For the required channel loading, the full motion, 30 frames per second MPEG video file from <http://ntiacsd.ntia.doc.gov/dfs/> was streamed from a network on a test bench (server of the storage to download the mandatory format of Video file), via the DFS Master device, to the UE (mobile phone).

#### 4.2.5 Test results

### Calibration plots for each of the required radar waveforms

#### Radar type 0



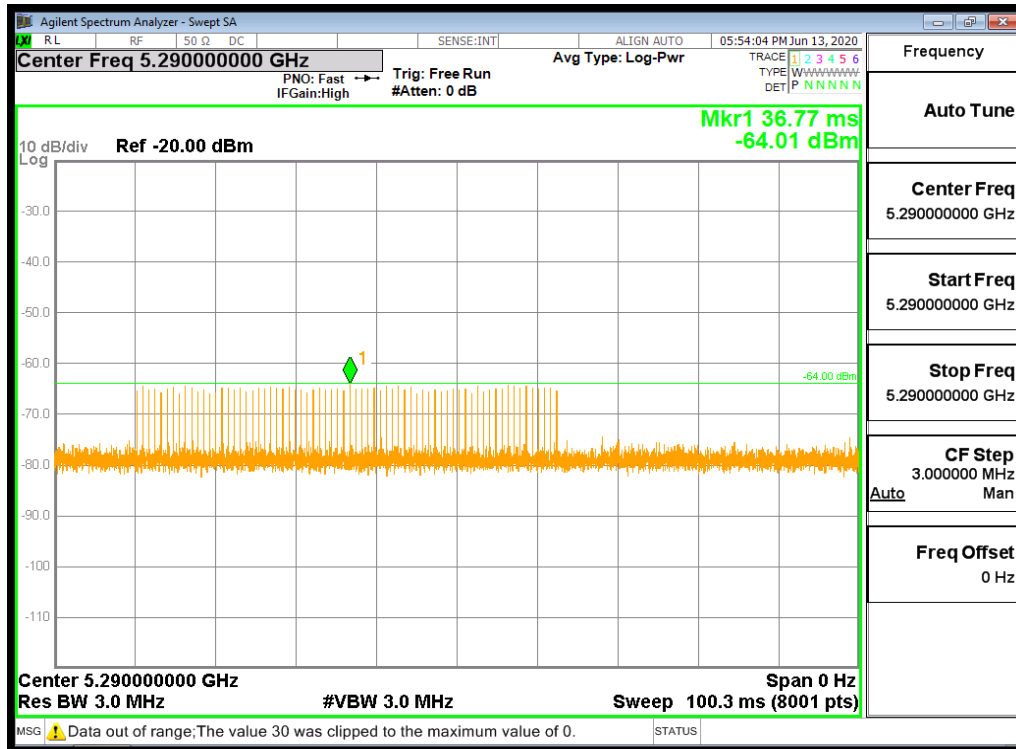
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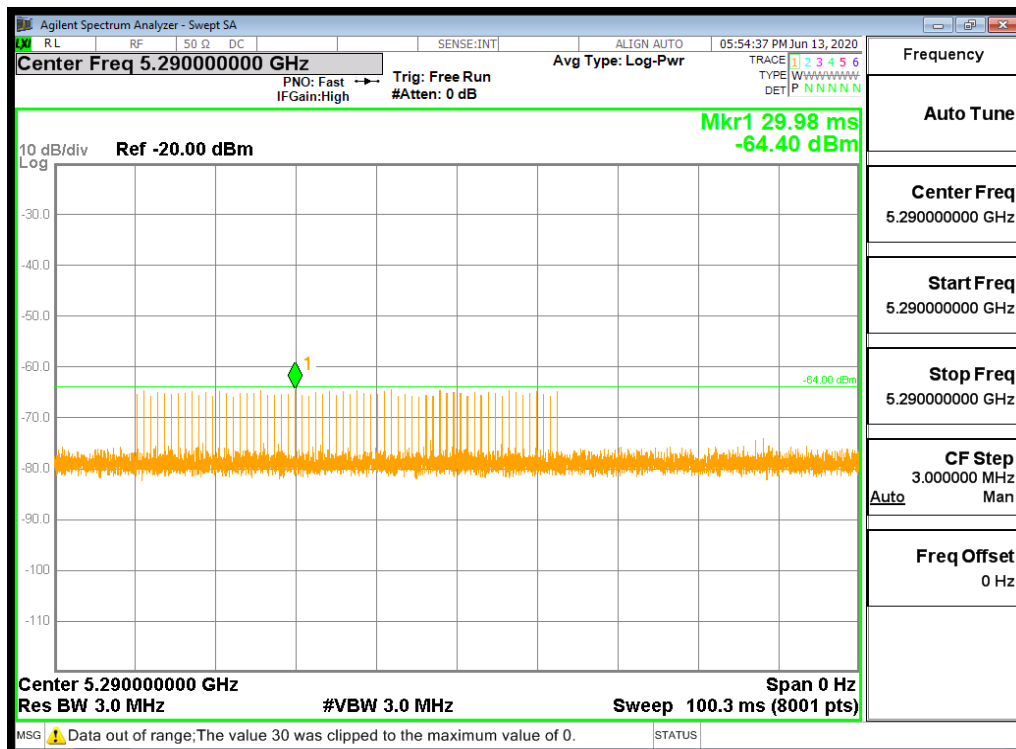
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## Radar type 1 A



## Radar type 1 B

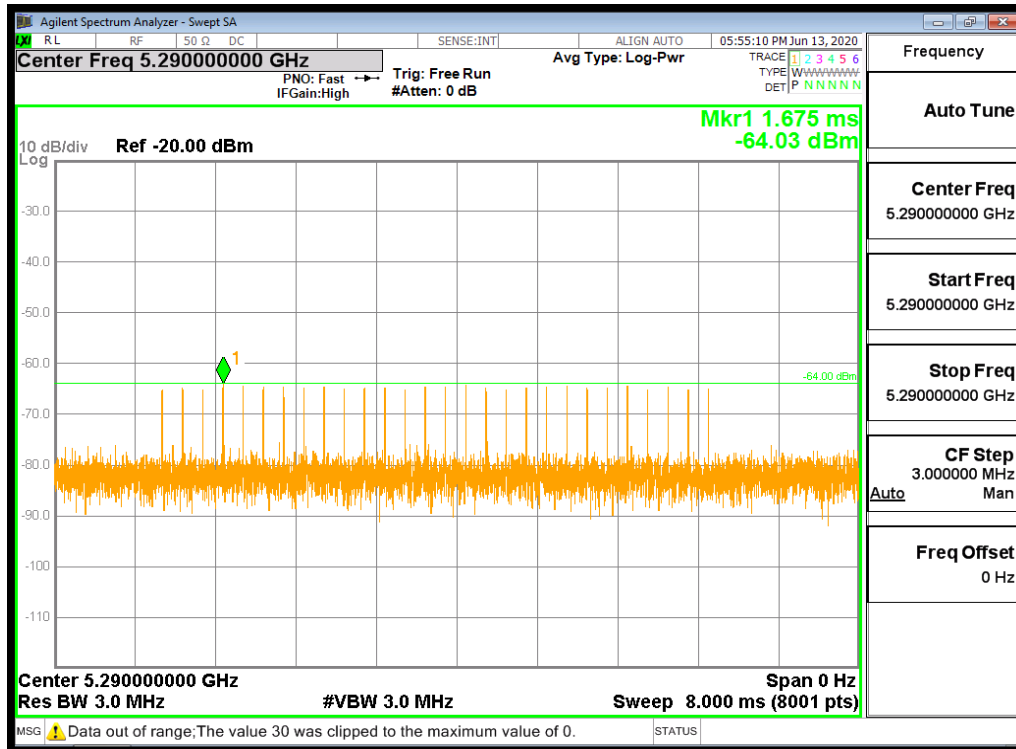


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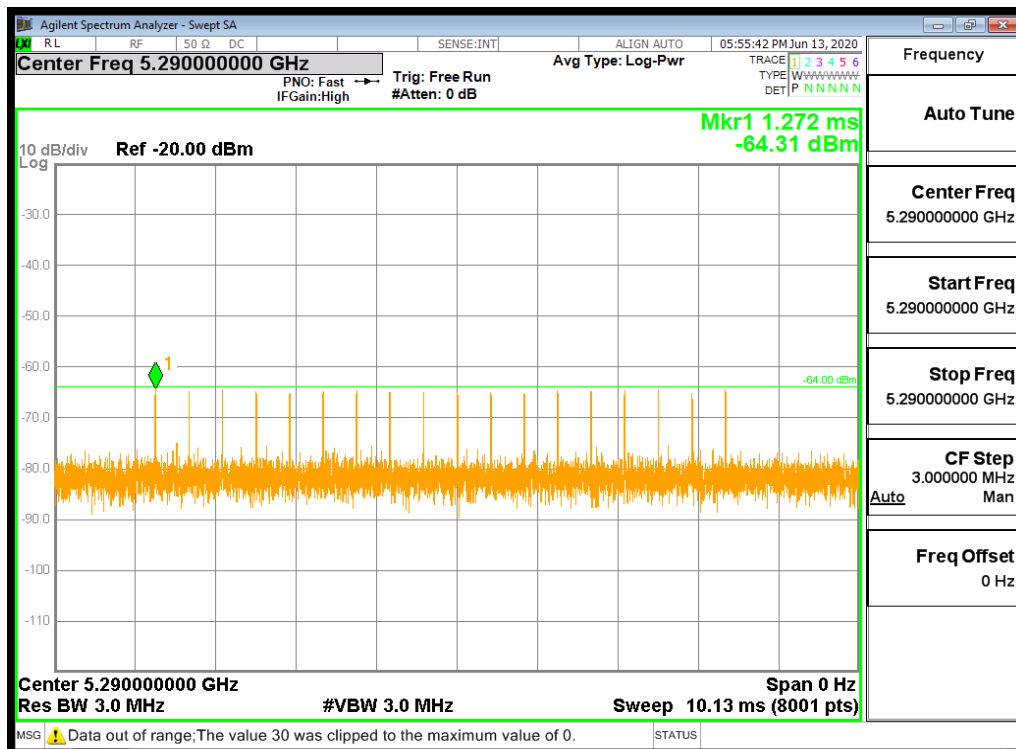
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## Radar type 2



## Radar type 3

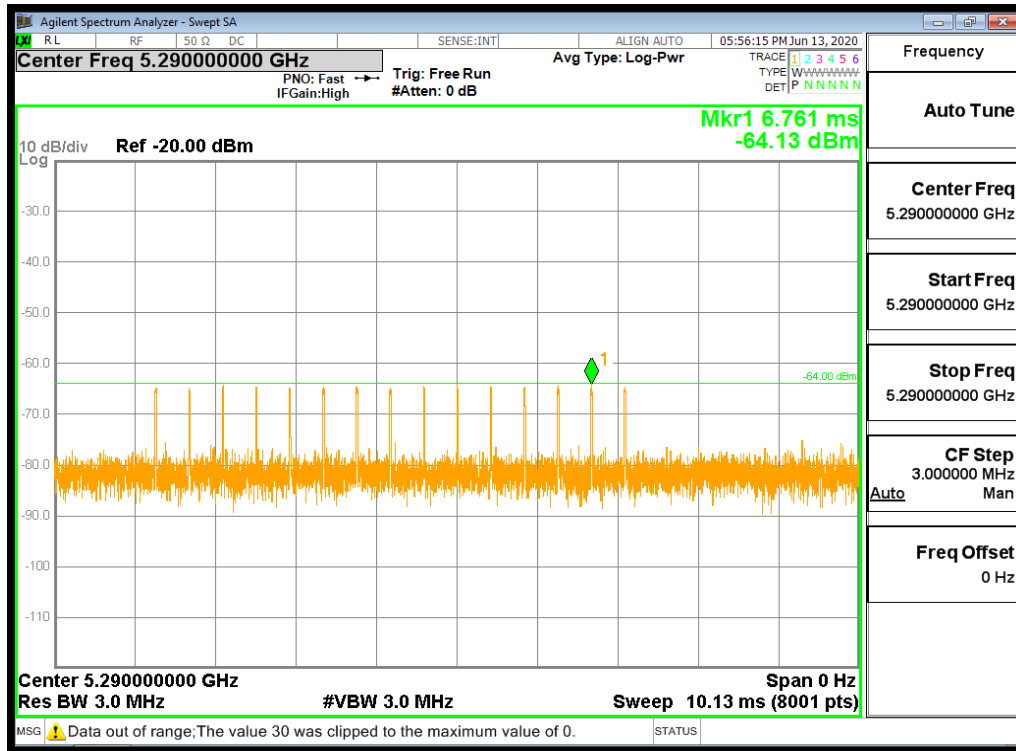


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## Radar type 4



## Radar type 5

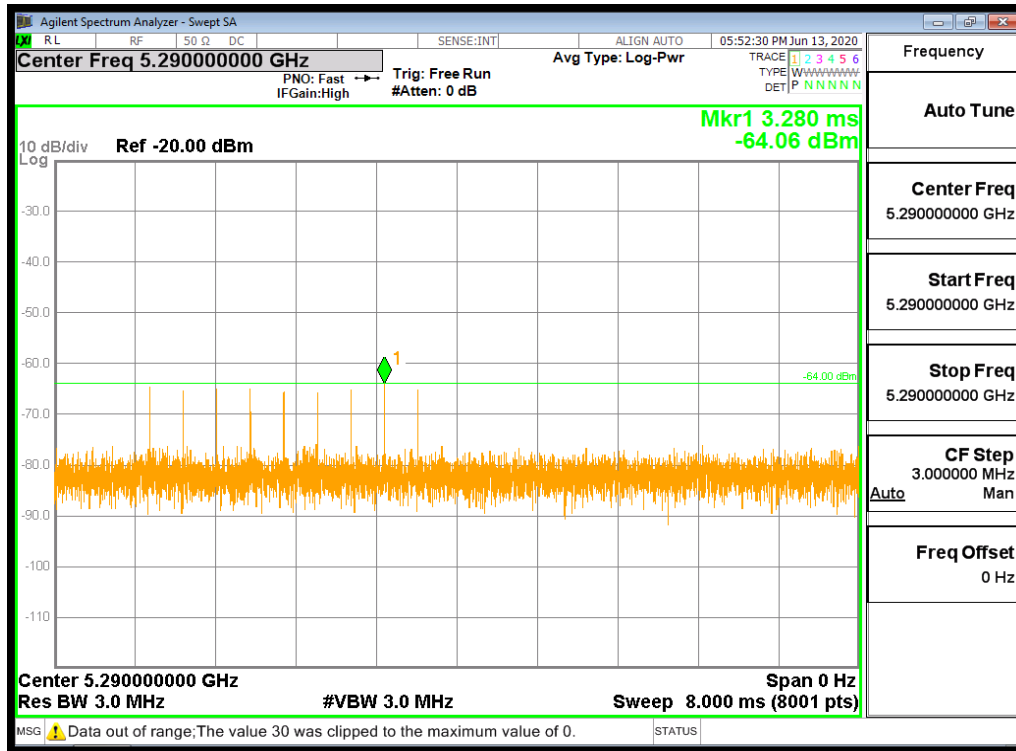


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## Radar type 6

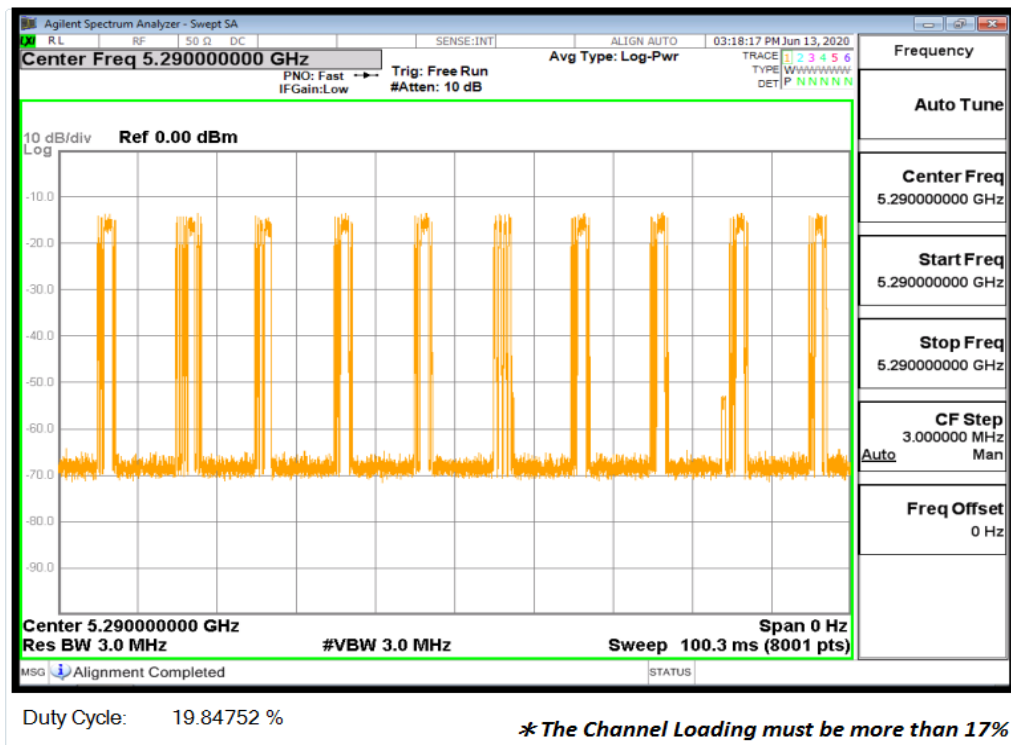


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## WLAN traffic

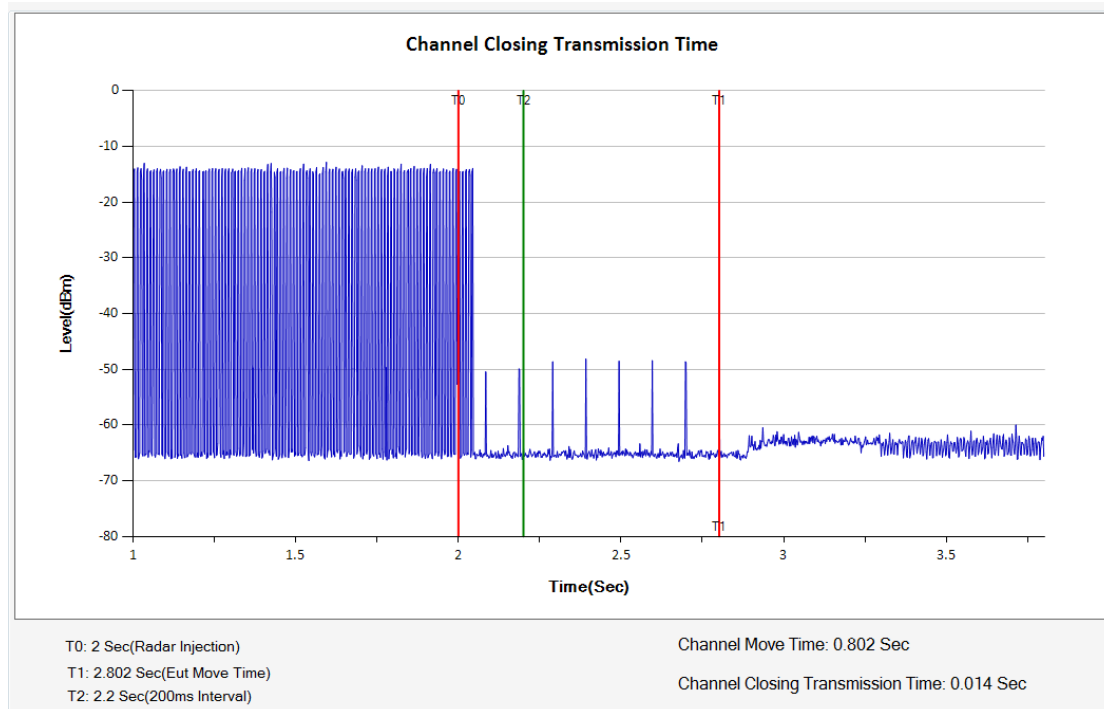


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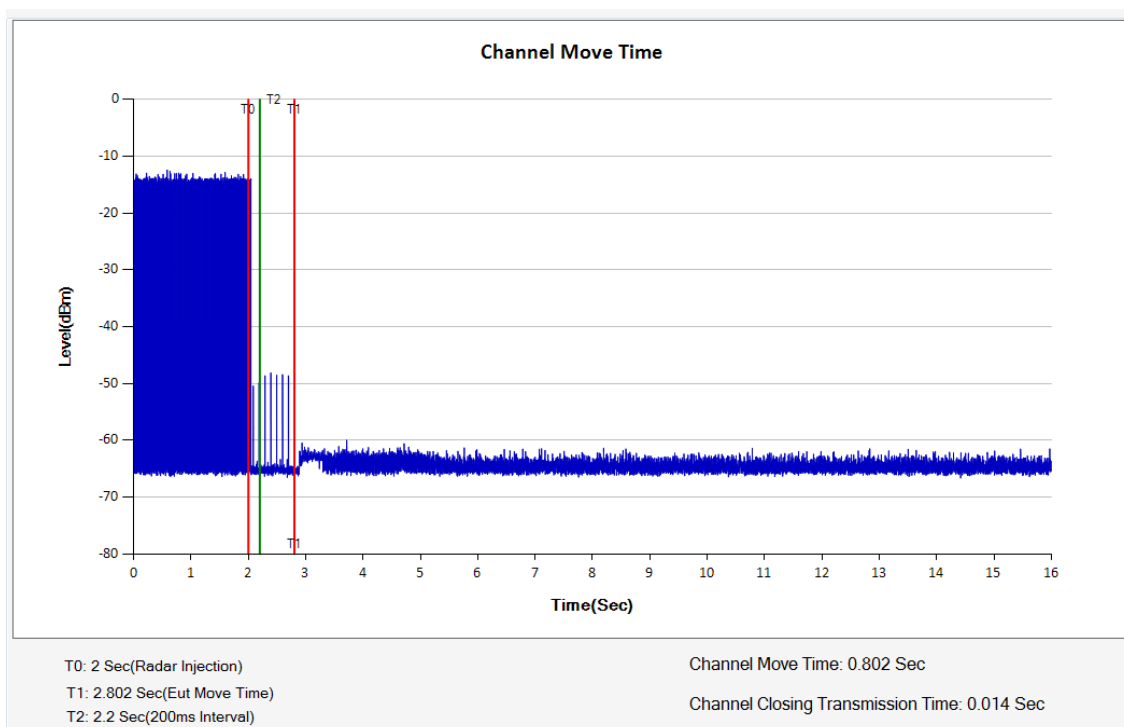
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## Radar Type 0 Channel Move and Closing Transmission Time - 1



## Radar Type 0 Channel Move and Closing Transmission Time - 2



**Verdict:** Note: narrowing the sweep time as the good engineering process for the verification of transmission closing in 200ms

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## Non-occupancy Period (without radar detection)



**Verdict:** To verify whether channel is unavailable to be operated in 30 minutes.

$$1.8ks = 1800s = 1800 \text{ s/min} / 60 = 30\text{minute}$$

~ End of Report ~

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