



# FCC PART 15, SUBPART C TEST REPORT

For

**Roku, Inc.**

1155 Coleman Ave,  
San Jose, CA 95110, USA

**FCC ID: TC2-R1036**

<b>Report Type:</b> Class II Permissive Change	<b>Model:</b> 4800X
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\* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "\*" (Rev 2)

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**DOCUMENT REVISION HISTORY**

<b>Revision Number</b>	<b>Report Number</b>	<b>Description of Revision</b>	<b>Date of Revision</b>
0	R2104214-DTS	Original Report	2021-08-27

# 1 General Description

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## 1.1 Product Description for Equipment Under Test (EUT)

This test report was prepared on behalf of *Roku, Inc.*, and their product model: *4800X*, FCC ID: TC2-R1036, or the “EUT” as referred to in this report. It is a Set-top-box.

## 1.2 Objective

This test report was prepared on behalf of *Roku, Inc.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules.

The objective was to determine compliance with FCC Part 15.247 rules for Output Power, Antenna Requirements, 6 dB Bandwidth, Power Spectral Density, 100 kHz Bandwidth of Band Edges Measurement, Conducted and Radiated Spurious Emissions.

This project is a Permissive Change II submission for the purpose of adding 40 MHz and 80 MHz bandwidth to device capability (Model: 4800X).

## 1.3 Related Submittal(s)/Grant(s)

FCC Part 15, Subpart E, Equipment NII with FCC ID: TC2-R1036

## 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	$\pm 5$ %
RF output power, conducted	$\pm 0.86$ dB
Power Spectral Density, conducted	$\pm 0.86$ dB
Unwanted Emissions, conducted	$\pm 2.76$ dB
All emissions, radiated	$\pm 4.94$ dB
AC power line Conducted Emission	$\pm 2.0$ dB
Temperature	$\pm 2$ ° C
Humidity	$\pm 5$ %
DC and low frequency voltages	$\pm 1.0$ %
Time	$\pm 2$ %
Duty Cycle	$\pm 3$ %

## 1.6 Test Facility Registrations

BACLs 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, 3<sup>rd</sup>-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02),** 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 3297.03) 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 3297.01) 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):



- BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - 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:
  - ENERGY STAR Recognized Test Laboratory – US EPA
  - Telecommunications Certification Body (TCB) – US FCC;
  - 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 software used was Teraterm. The software is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Power Setting	
		Ant A	Ant B
802.11n40	2422	63	63
	2437	127	127
	2452	68	68

Data Rates Tested:

802.11n HT40 mode: MCS0

## 2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

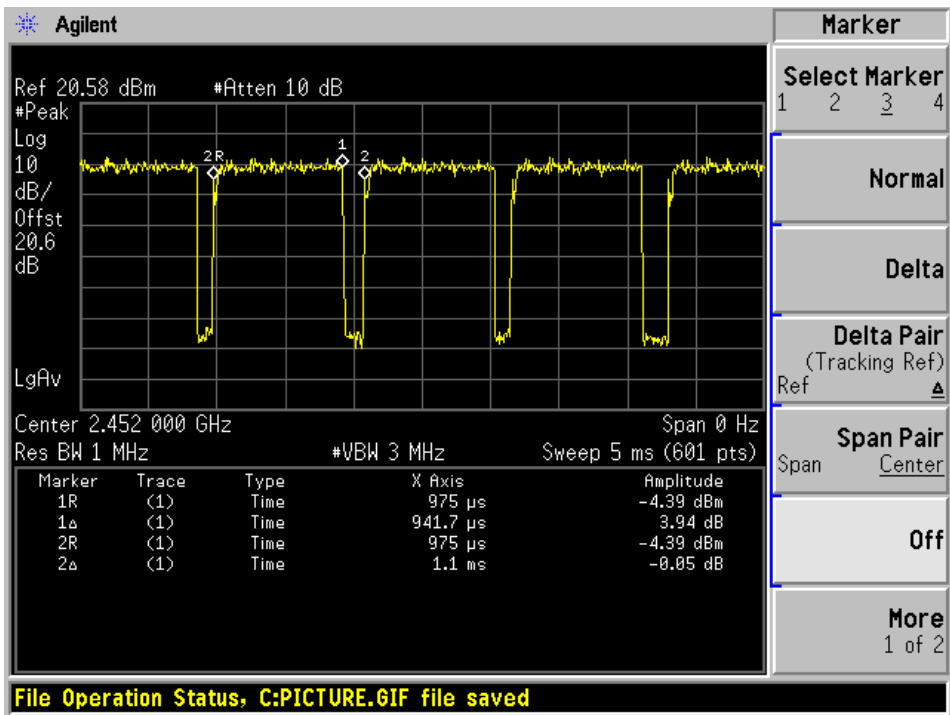
Radio Mode	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
802.11n40	0.94	1.10	85.45	0.68

Duty Cycle = On Time (ms)/ Period (ms)

Duty Cycle Correction Factor (dB) =  $10 \cdot \log(1/\text{Duty Cycle})$

Please refer to the following plots.

802.11n40 mode



## 2.4 Equipment Modifications

N/A

## 2.5 Local Support Equipment

Manufacturer	Description	Model
Dell	Laptop	Latitude E6410

## 2.6 Support Equipment

Manufacturer	Description	Model
Roku, Inc.	Debug Board	-

## 2.7 Interface Ports and Cabling

Cable Description	Length (m)	To	From
USB Cable	< 1 m	Laptop	EUT
RF Cable	< 1 m	EUT	PSA

## 2.8 Information Provided by Customer

Antenna usage	Frequency Range (MHz)	Antenna Type	Maximum Antenna Gain (dBi)
Bluetooth	2400-2483.5	Metal Antenna	2.7
2.4GHz Wi-Fi (Ant A)	2400-2483.5	Metal Antenna	2.4
2.4GHz Wi-Fi (Ant B)	2400-2483.5	PCB Antenna	3.9
5GHz Wi-Fi (Ant A)	5150-5850	Metal Antenna	4.7
5GHz Wi-Fi (Ant B)	5150-5850	PCB Antenna	4.5

### 3 Summary of Test Results

Results reported relate only to the product tested.

FCC Rules	Description of Test	Results
FCC §15.203	Antenna Requirement	Compliant
FCC §15.207	AC Line Conducted Emissions	Compliant
FCC §2.1091, §15.247(i)	RF Exposure	Compliant
FCC §2.1051, §15.247 (d)	Spurious Emissions at Antenna Port	Compliant
FCC §2.1053, §15.205, §15.209, §15.247 (d)	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2)	6 dB and 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3)	Maximum Peak Output Power	Compliant
FCC §15.247(d)	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §15.247(e)	Power Spectral Density	Compliant

## 4 FCC §15.203 - Antenna Requirements

### 4.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

### 4.2 Antenna Description

The antennas used by the EUT are permanent attached antennas.

Antenna usage	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Bluetooth Metal Antenna	2400-2483.5	2.7
2.4GHz Wi-Fi Metal Antenna (Ant A)	2400-2483.5	2.4
2.4GHz Wi-Fi PCB Antenna (Ant B)	2400-2483.5	3.9
5GHz Wi-Fi Metal Antenna (Ant A)	5150-5850	4.7
5GHz Wi-Fi PCB Antenna (Ant B)	5150-5850	4.5

Antenna information is provided by customer.

## 5 FCC §2.1091, §15.247(i) – RF Exposure

### 5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB 447 498 Section (7.2), "simultaneous transmission of MPE test exclusion applies when the sum of the MPE ratios for all simultaneous transmitting antennas incorporated in a host device, based on calculated or measured field strengths or power density, is  $\leq 1.0$ . The MPE ratio of each antenna is determined at the minimum *test separation distance* required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to MPE limit, at the test frequency.

#### Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Averaging Time (minutes)
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 <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

Where: f = frequency in MHz

\* = Plane-wave equivalent power density

Before equipment certification is granted, the procedure of IC RSS-102 must be followed concerning the exposure of humans to RF field.

### 5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from 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



## 5.3 MPE Results

### 2.4 Wi-Fi

*Worst Case: 802.11n40, 2437 MHz*

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>26.91</u>
<u>Maximum output power at antenna input terminal (mW):</u>	<u>491.00</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2437</u>
<u>Maximum Directional Antenna Gain, typical (dBi):</u>	<u>6.19</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>4.16</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.605</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement FCC MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.605 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

### Radio Co-location

2.4 GHz Wi-Fi and 5 GHz Wi-Fi simultaneous transmission is not supported.

#### Worst case colocation 2.4 GHz Wi-Fi and 2.4 GHz Classic Bluetooth:

Frequency Band	Max Conducted Power(dBm)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm <sup>2</sup> )	MPE Limit (mW/cm <sup>2</sup> )	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
Worst Case							
2.4 GHz Wi-Fi	26.91	20	0.605	1.0	60.5%	61.6%	1
2.4 GHz Classic BT	14.58	20	0.011	1.0	1.1%		

## 6 FCC §15.207 - AC Power Line Conducted Emissions

### 6.1 Applicable Standards

As per FCC §15.207

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  $\mu$ 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 <sup>Note1</sup>	56 to 46 <sup>Note2</sup>
0.5-5	56	46
5-30	60	50

*Note1: Decreases with the logarithm of the frequency.*

*Note2: A linear average detector is required*

### 6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used was FCC §15.207 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.

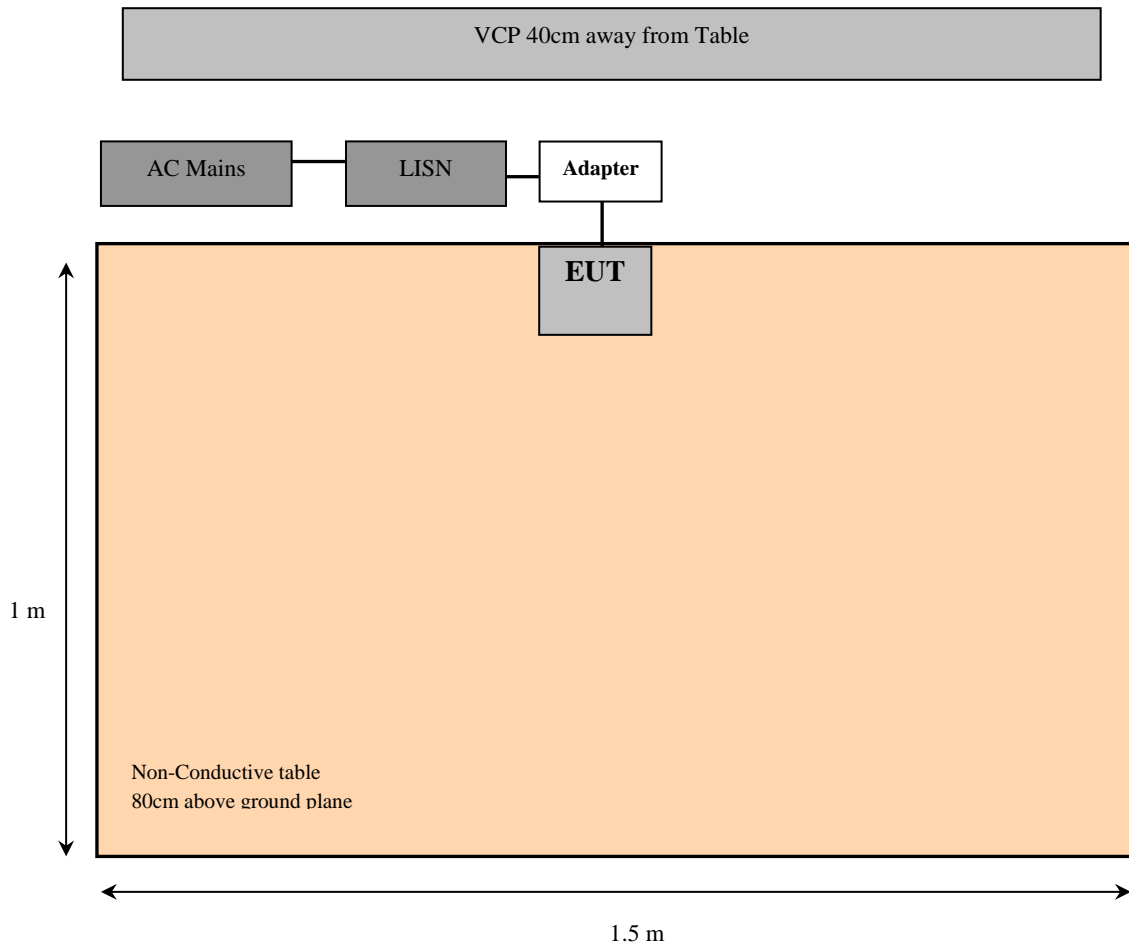
### 6.3 Test Procedure

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 was 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".

## 6.4 Test Setup Block Diagram



## 6.5 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Correction Factor (CF) to indicated Amplitude ( $A_i$ ) reading. The basic equation is as follows:

$$CA = A_i + CF$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Correction Factor (13.7 dB)

The Correction Factor is calculated by adding Cable loss (CL), LISN calibration factor, and attenuation of the impulse limiter and the high pass filter. The basic equation is as follows:

$$CF = CL + \text{LISN calibration factor} + \text{Attenuation}$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.5 dB) + LISN calibration factor (0.2 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:

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

## 6.6 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	2020-03-17	1.5 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101964	2020-07-01	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150203	2021-03-02	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2020-10-13	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 6.7 Test Environmental Conditions

<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	101.31 kPa

The testing was performed by Christian McCaig on 2021-05-14 in the Ground Plane test site.

## 6.8 Summary of Test Results

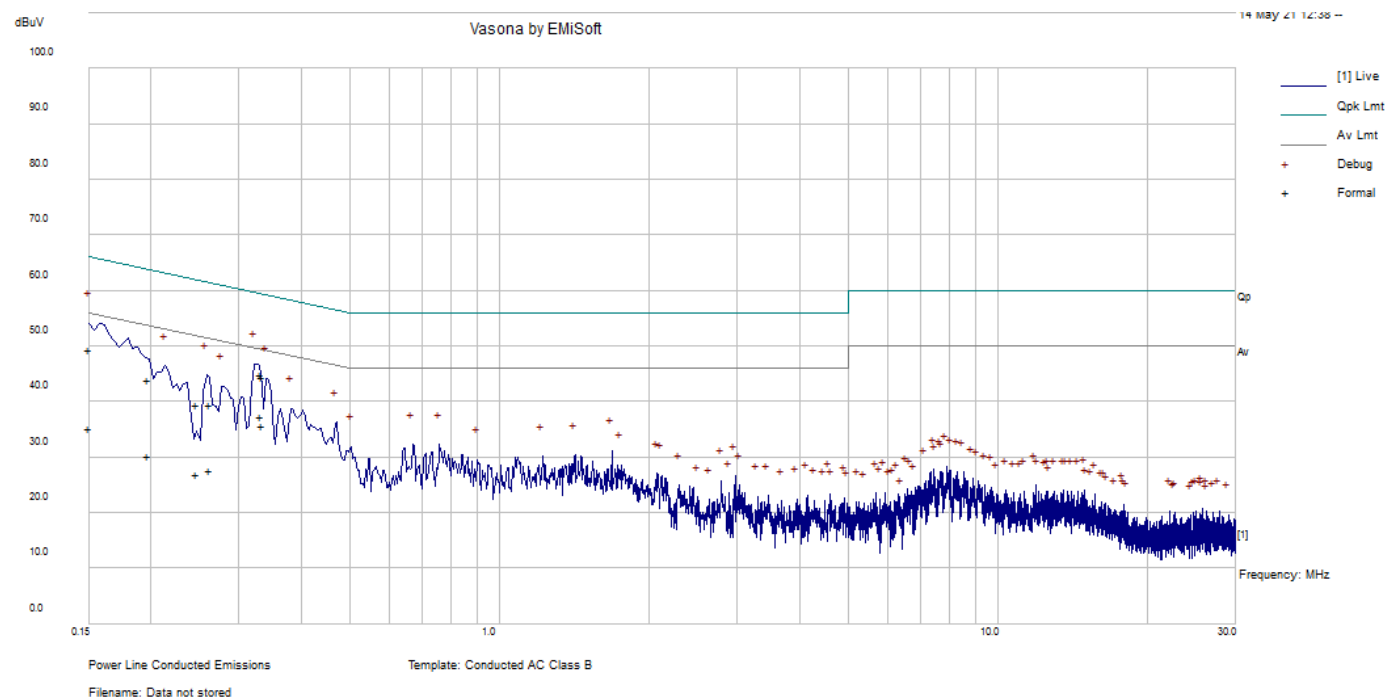
According to the recorded data in following table, the EUT complied with the FCC Part 15 and RSS-Gen standards'conducted emissions limits, with the margin reading of:

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-13.53	0.335005	Line	0.15-30

## 6.9 Conducted Emissions Test Plots and Data

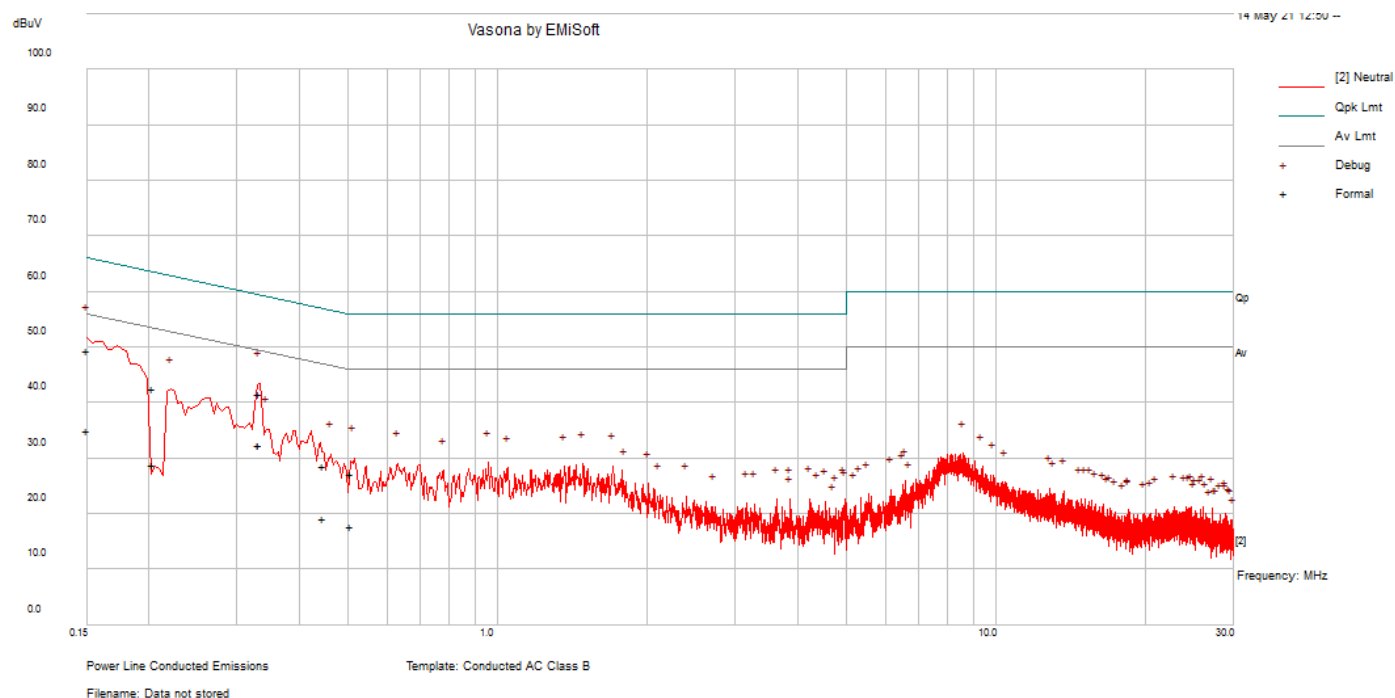
Worst Case: 802.11n40 mode – 2437MHz

### 120 V, 60 Hz – Line



Frequency (MHz)	Ai. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBμV)	Limit (dBμV)	Margin (dB)	Detector
0.150361	38.76	10.74	49.5	65.98	-16.48	QP
0.335005	33.84	10.51	44.35	59.33	-14.97	QP
0.332927	34.45	10.52	44.97	59.38	-14.41	QP
0.197146	33.25	10.69	43.94	63.73	-19.79	QP
0.246424	28.76	10.63	39.39	61.88	-22.49	QP
0.263047	28.94	10.6	39.54	61.33	-21.79	QP
0.150361	24.45	10.74	35.19	55.98	-20.79	Ave
<b>0.335005</b>	<b>25.28</b>	<b>10.51</b>	<b>35.79</b>	<b>49.33</b>	<b>-13.53</b>	<b>Ave</b>
0.332927	26.75	10.52	37.27	49.38	-12.11	Ave
0.197146	19.59	10.69	30.28	53.73	-23.45	Ave
0.246424	16.24	10.63	26.87	51.88	-25.01	Ave
0.263047	16.95	10.6	27.55	51.33	-23.78	Ave

## 120 V, 60 Hz – Neutral



Frequency (MHz)	Ai. Reading (dBμV)	Correction Factor (dB)	Corrected Amplitude (dBμV)	Limit (dBμV)	Margin (dB)	Detector
0.15025	38.7	10.74	49.44	66	-16.55	QP
0.325627	31.06	10.51	41.57	59.4	-17.82	QP
0.161852	31.79	10.68	42.47	63.46	-20.98	QP
0.238768	31.09	10.51	41.6	59.39	-17.79	QP
0.362503	18.17	10.39	28.56	56.93	-28.37	QP
0.299188	16.94	10.34	27.28	56	-28.72	QP
0.15025	24.33	10.74	35.07	56	-20.93	Ave
0.325627	21.79	10.51	32.3	49.4	-17.09	Ave
0.161852	18.17	10.68	28.85	53.46	-24.6	Ave
0.238768	21.88	10.52	32.4	49.39	-16.99	Ave
0.362503	8.88	10.39	19.27	46.93	-27.66	Ave
0.299188	7.52	10.33	17.85	46	-28.15	Ave

## 7 FCC §15.209, §15.247(d) - Spurious Radiated Emissions

### 7.1 Applicable Standards

As per FCC §15.35(d): 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)).



## 7.2 Test Setup

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

The spacing between the peripherals was 10 centimeters.

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

## 7.3 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 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter 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:  $\text{RBW} = 1\text{MHz} / \text{VBW} = 10\text{Hz} \text{ or } 1/\text{T} / \text{Sweep} = \text{Auto}$

## 7.4 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:

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

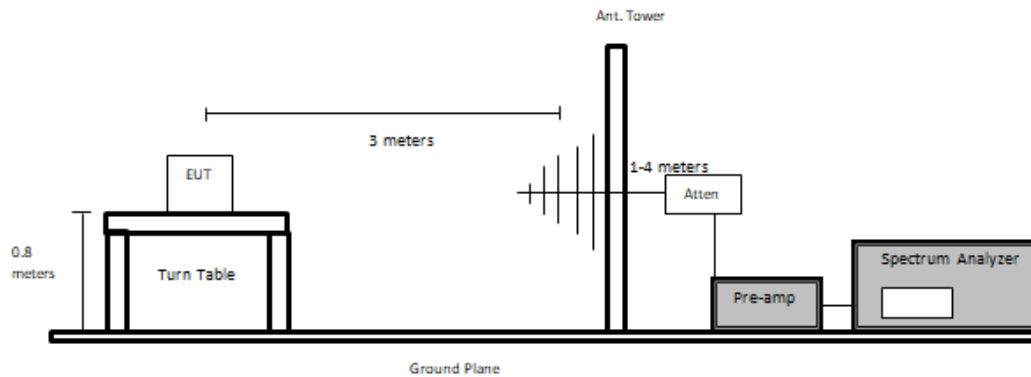
For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

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:

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

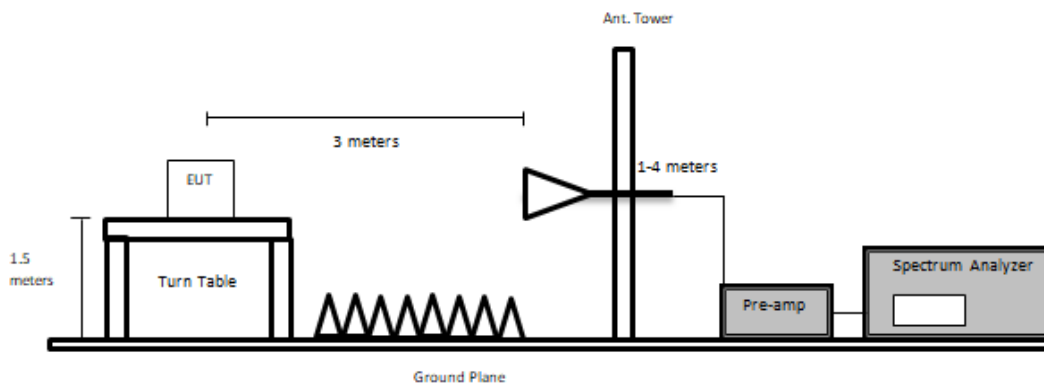
## 7.5 Test Setup Block Diagram

Below 1GHz:

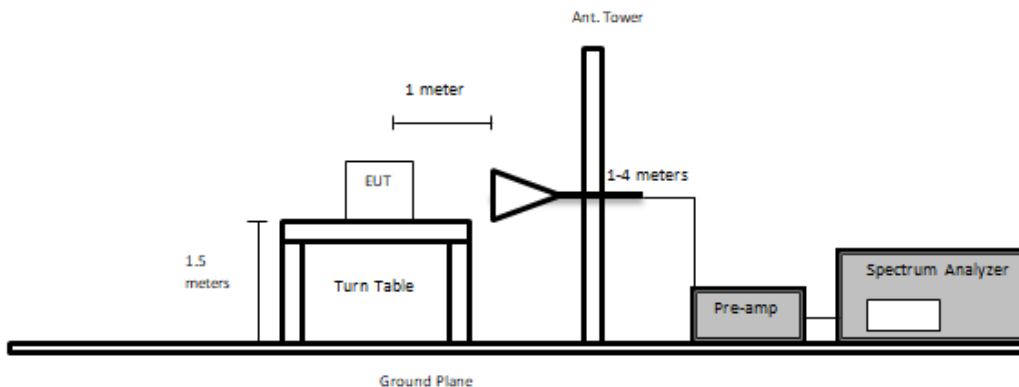


Above 1GHz:

At 3 meters:



At 1 meter:



## 7.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100044	2020-10-26	2 years
Agilent	Spectrum Analyzer	E4446A	US44300386	2020-04-27	18 months
Sunol Science Corp	System Controller	SC110V	122303-1	N/R	N/A
HP	Pre-Amplifier	8447D	2944A07030	2020-08-17	1 year
HP	Pre-Amplifier	8449B	3147A00400	2021-03-02	1 year
AH Systems	Pre-Amplifier	PAM 1840 VH	170	2020-11-09	1 year
Wisewave	Horn Antenna	ARH-4223-02	10555-02	2020-02-05	2 years
ETS Lindgren	Horn Antenna	3117	00218973	2019-02-13	2.5 years
Sunol Sciences	Biconilog Antenna	JB3	A020106-2	2019-11-20	2 years
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	Notch Filter	-	-	Each time <sup>1</sup>	N/A
IW Incorporated	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN-3960-KPS	DC 1917	2021-03-03	1 year
MDP Digital	Times Microwave LMR 400 UltraFex Coaxial Cable 35'	LMR400UF	BACL1904161	2020-05-20	1 year
IW Incorporated	157 Series Cable Armored with 2.92mm Male Plugs	KPS-1571AN-2400	DC 1922	2020-06-06	1 year
BACL	5m3 Sensitivity Box	1	2	2020-10-27	1 years

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** **BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 7.7 Test Environmental Conditions

<b>Temperature:</b>	20-22 °C
<b>Relative Humidity:</b>	42-50 %
<b>ATM Pressure:</b>	102.7 kPa

The testing was performed by Rita Yang from 2021-05-06 to 2021-05-13 in 5m chamber 3.

## 7.8 Summary of Test Results

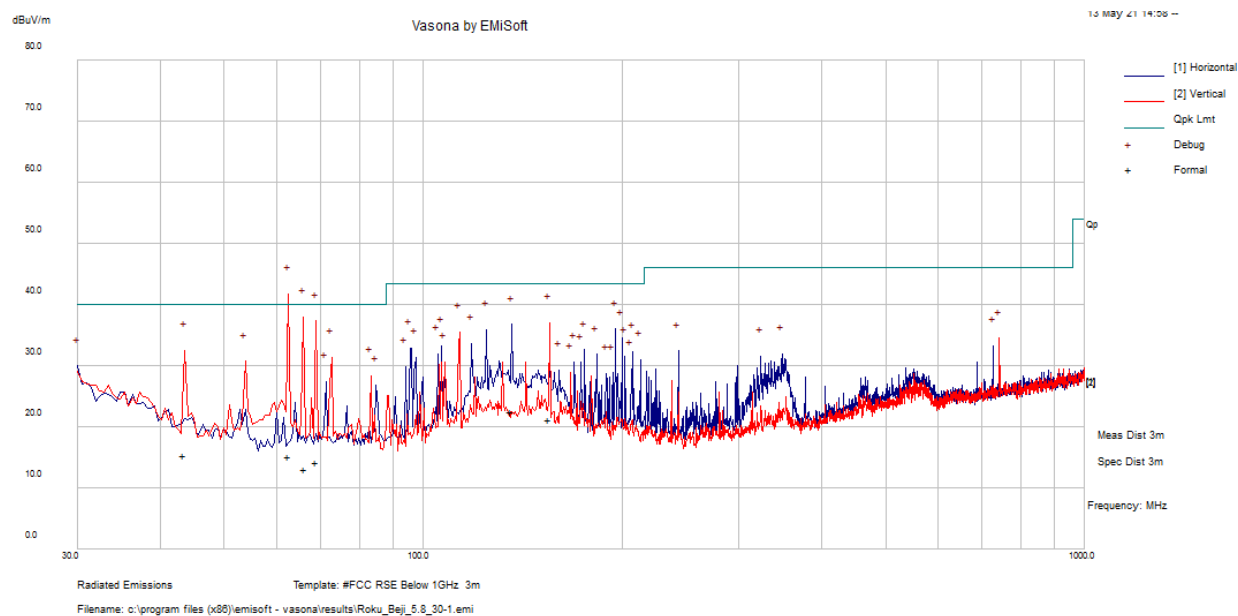
According to the data here in after, the EUT complied with FCC Title 47, Part 15C standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, channel
-0.99	2483.5	Vertical	N40 mode, High channel

## 7.9 Radiated Emissions Test Results

### 1) 30 MHz – 1 GHz at 3 meters

Worst Case: n40 mode, 2437 MHz

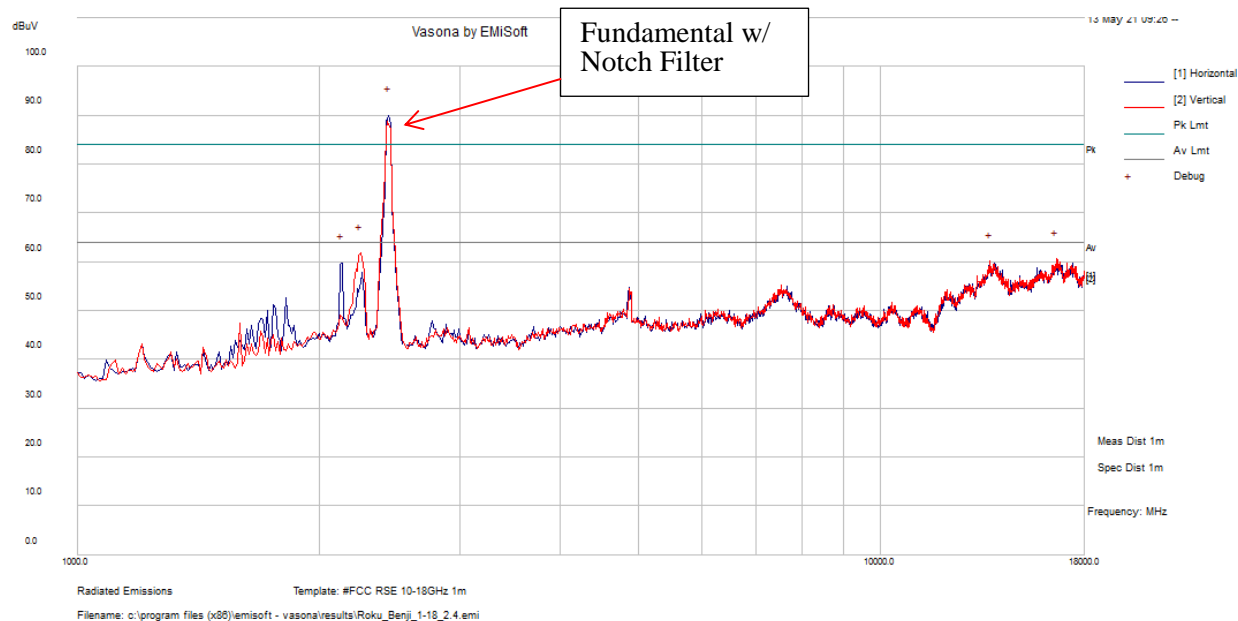


Frequency (MHz)	S.A Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Comment
62.70325	25.96	3.74	29.7	105	H	232	40	-10.3	Pass
66.06875	23.66	5.74	29.4	114	H	118	46	-16.6	Pass
68.91475	24.48	8.49	32.97	122	H	279	46	-13.03	Pass
155.1755	26.99	-8.39	18.6	196	V	159	40	-21.4	Pass
135.9025	27.38	-3.25	24.13	289	H	352	43.5	-19.37	Pass
43.43325	22.95	8.04	30.99	108	H	164	46	-15.01	Pass

## 2) 1-26.5GHz measurement data tables, Measured at 3 meters

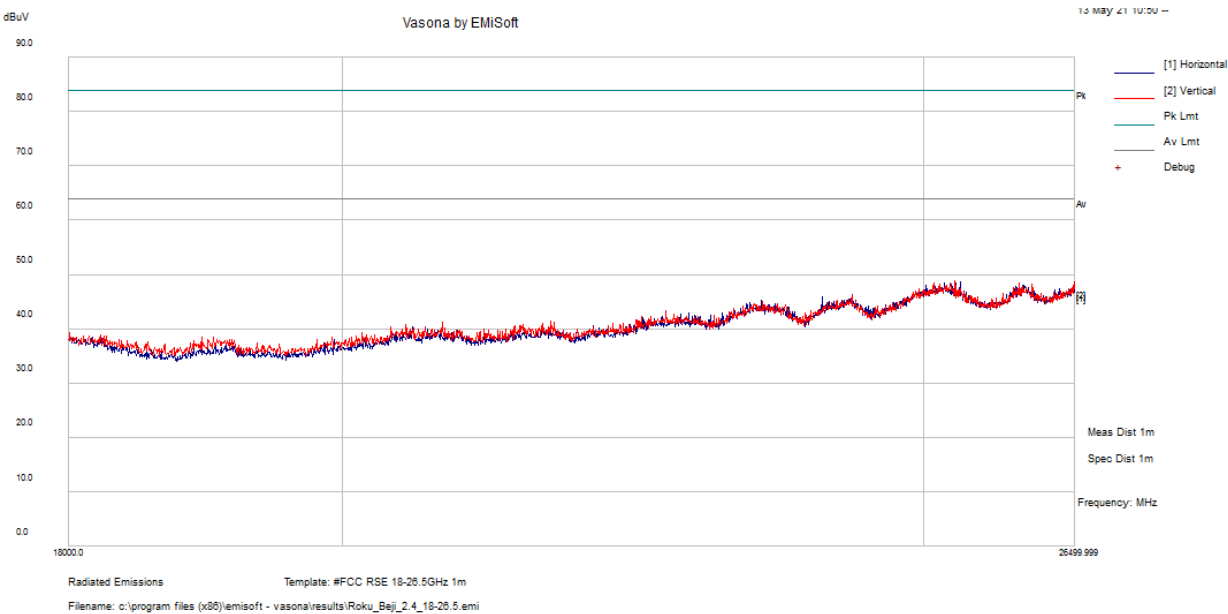
## 802.11n40 mode

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel 2422 MHz											
2390	68.13	0	125	V	32.6	5.69	36.863	69.56	74	-4.44	Peak
2390	67.27	0	110	H	32.6	5.69	36.863	68.70	74	-5.30	Peak
2390	51.34	0	125	V	32.6	5.69	36.863	52.77	54	-1.23	Ave
2390	45.90	0	110	H	32.6	5.69	36.863	47.32	54	-6.68	Ave
4844	43.15	0	100	V	35.2	9.196	35.707	51.839	74	-22.161	Peak
4844	43.47	0	100	H	35.2	9.196	35.707	52.159	74	-21.841	Peak
4844	32.38	0	100	V	35.2	9.196	35.707	41.069	54	-12.931	Ave
4844	32.63	0	100	H	35.2	9.196	35.707	41.319	54	-12.681	Ave
Middle Channel 2437 MHz											
4874	45.14	0	100	V	35.2	9.406	35.707	54.04	74	-19.96	Peak
4874	45.09	0	100	H	35.2	9.406	35.707	53.99	74	-20.01	Peak
4874	34.24	0	100	V	35.2	9.406	35.707	43.14	54	-10.86	Ave
4874	32.66	0	100	H	35.2	9.406	35.707	41.56	54	-12.44	Ave
High Channel 2452 MHz											
2483.5	67.36	45	110	V	33	5.763	36.863	69.26	74	-4.74	Peak
2483.5	65.48	100	105	H	33	5.763	36.863	67.38	74	-6.62	Peak
2483.5	51.11	45	110	V	33	5.763	36.863	53.01	54	-0.99	Ave
2483.5	47.11	100	105	H	33	5.763	36.863	49.01	54	-4.99	Ave
4904	44.11	0	100	V	35.4	9.306	35.707	53.109	74	-20.891	Peak
4904	43.91	0	100	H	35.4	9.306	35.707	52.909	74	-21.091	Peak
4904	32.979	0	100	V	35.4	9.306	35.707	41.978	54	-12.022	Ave
4904	32.732	0	100	H	35.4	9.306	35.707	41.731	54	-12.269	Ave

**3) 1–18 GHz Measured Worst case scan at 1 meter***Worst Case: n40 mode, 2437 MHz*

4) 18 – 26.5 GHz Measured at 1 meter

Worst Case: n40 mode, 2437 MHz





## 8 FCC §15.247(a) (2) - Emission Bandwidth

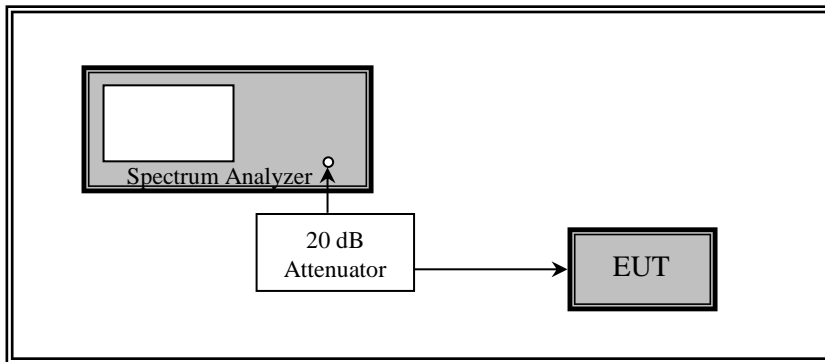
### 8.1 Applicable Standards

According to ECFR §15.247(a) (2), systems using digital modulation techniques may operate in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz

### 8.2 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 8: DTS bandwidth

### 8.3 Test Setup Block Diagram



### 8.4 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	MY48250238	2021-02-12	18 months
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20 dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** **BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 8.5 Test Environmental Conditions

<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

*The testing was performed by Rita Yang on 2021-05-10 in RF site.*

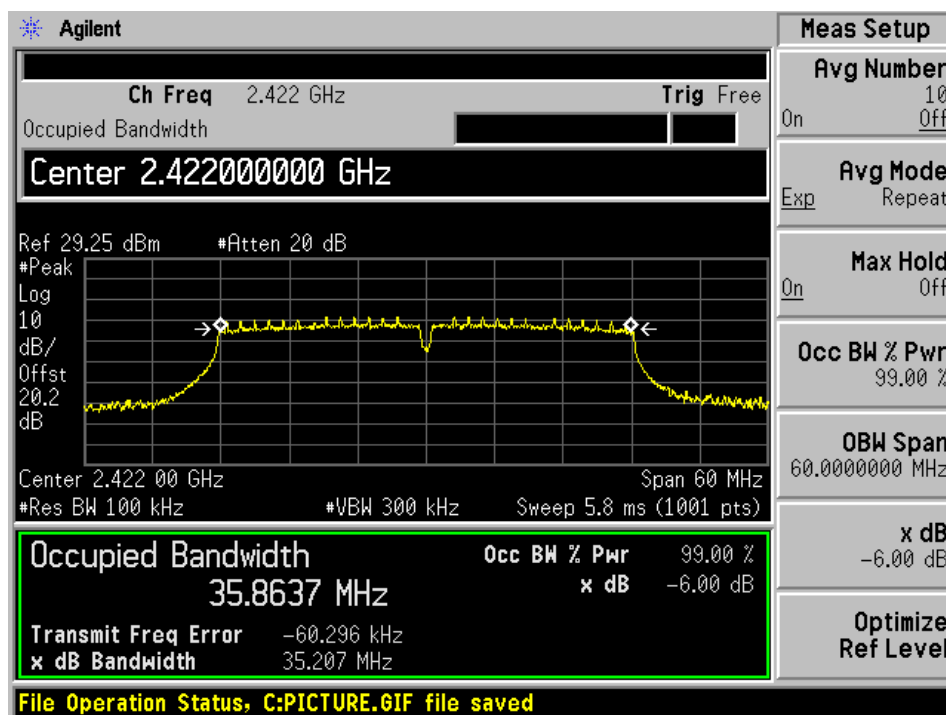
## 8.6 Test Results

Channel	Frequency (MHz)	6 dB OBW (MHz)		99% OBW (MHz)		6 dB OBW Limit (kHz)	Result
		Antenna A	Antenna B	Antenna A	Antenna B		
802.11n40							
Low	2422	35.207	35.210	36.1338	36.1632	≥ 500	Pass
Middle	2437	35.020	36.377	76.3230	65.5458	≥ 500	Pass
High	2452	35.207	35.192	36.153	36.2229	≥ 500	Pass

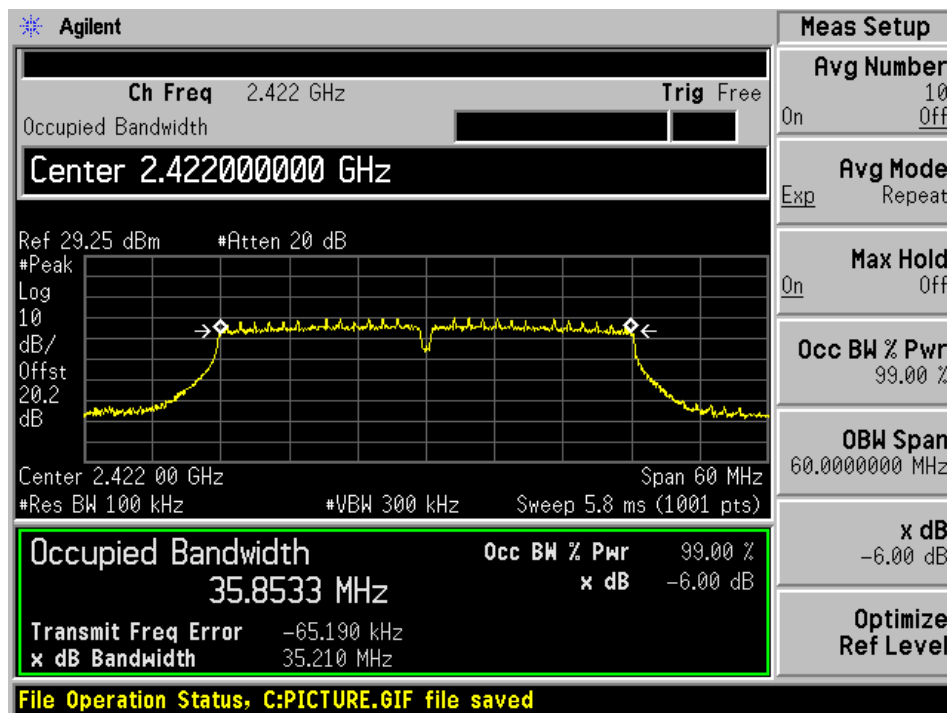
Please refer to the following plots for detailed test results:

## 802.11n40 mode

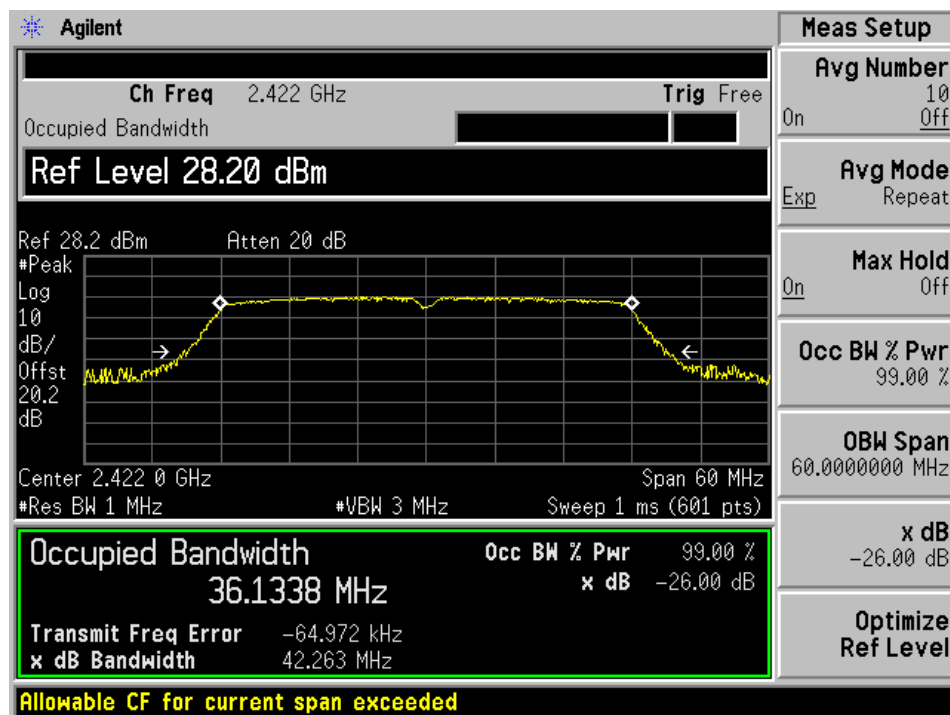
Low Channel 6 dB OBW Antenna A



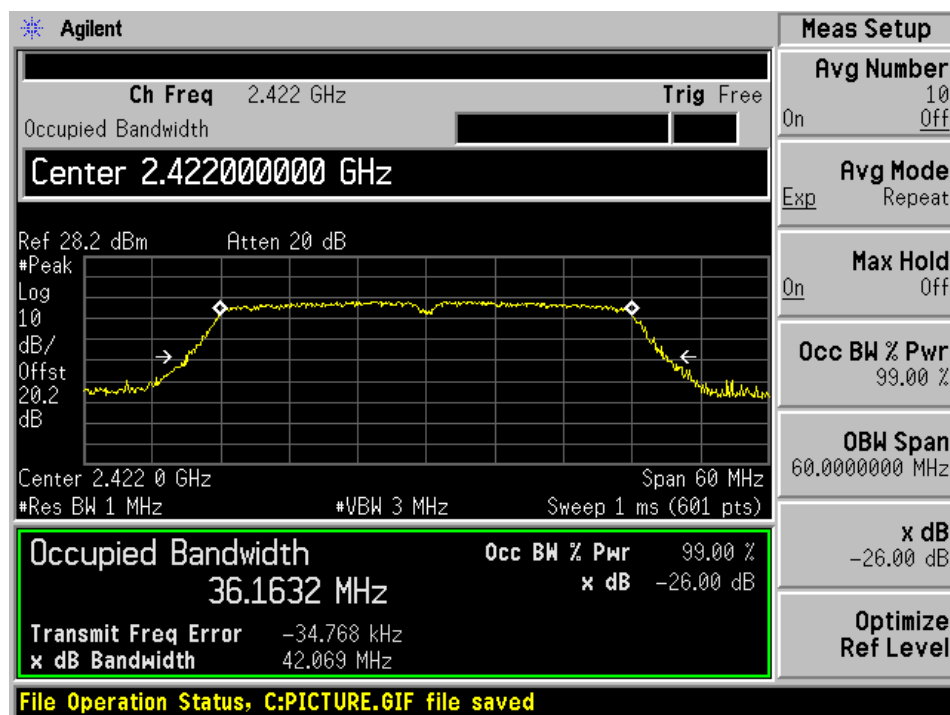
Low Channel 6 dB OBW Antenna B



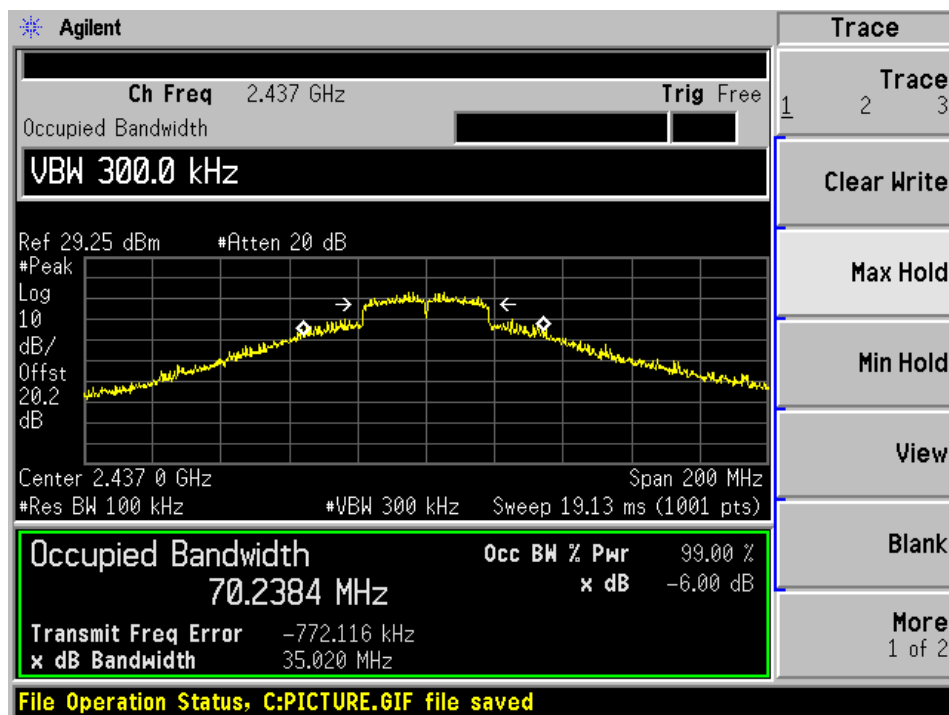
## Low Channel 99% dB OBW Antenna A



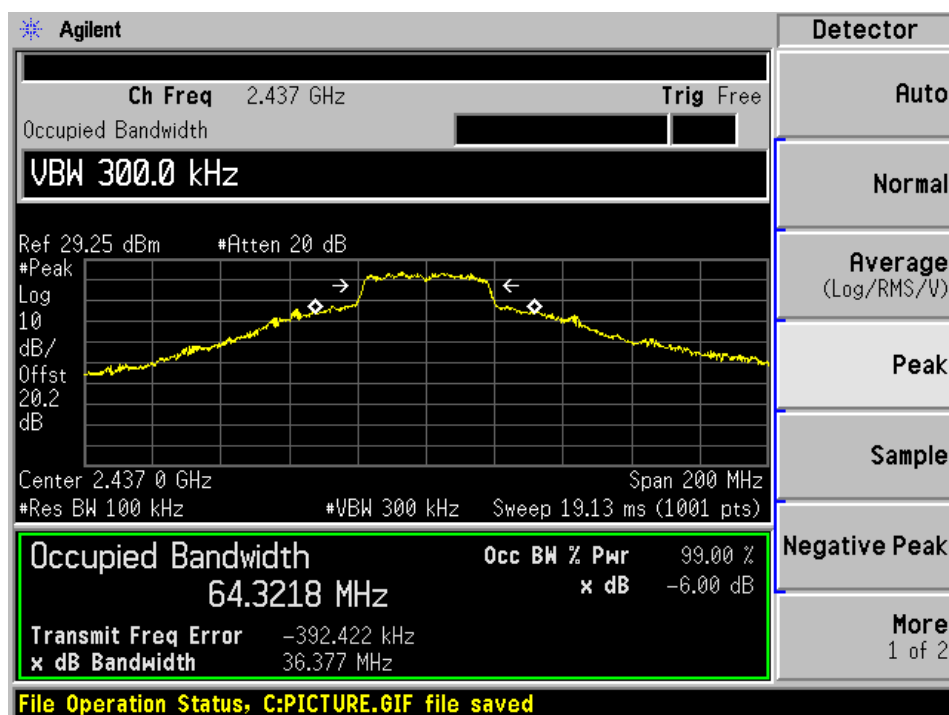
## Low Channel 99% dB OBW Antenna B



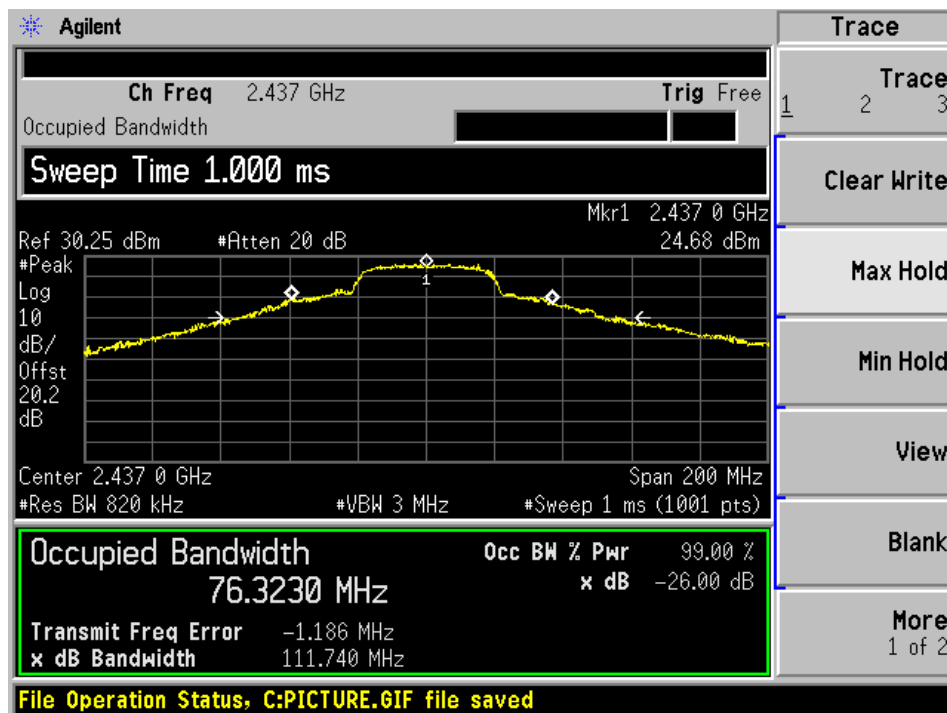
## Mid Channel 6 dB OBW Antenna A



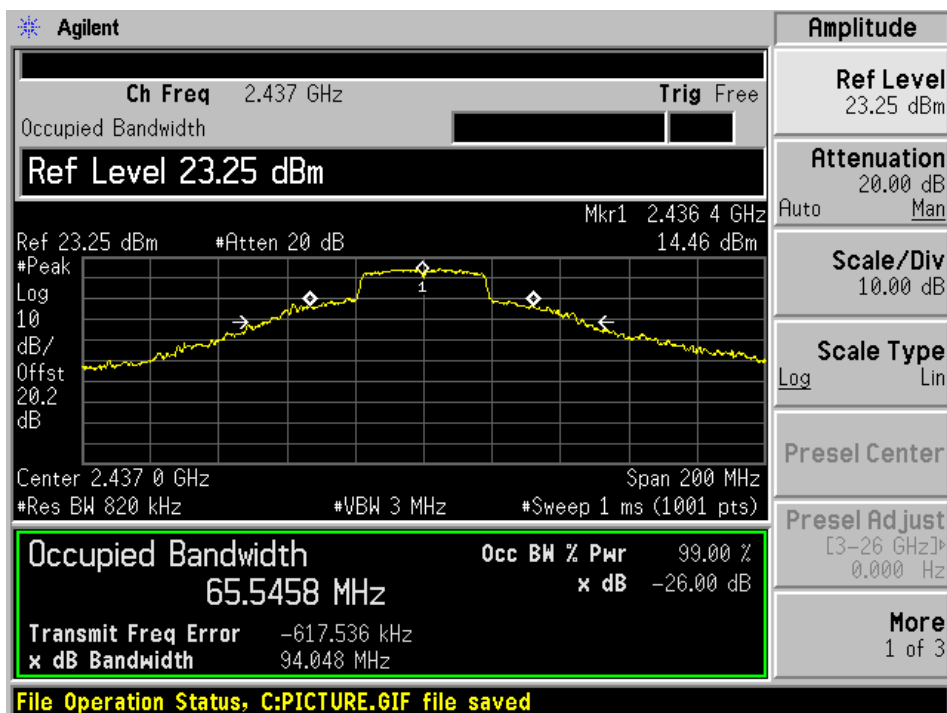
## Mid Channel 6 dB OBW Antenna B



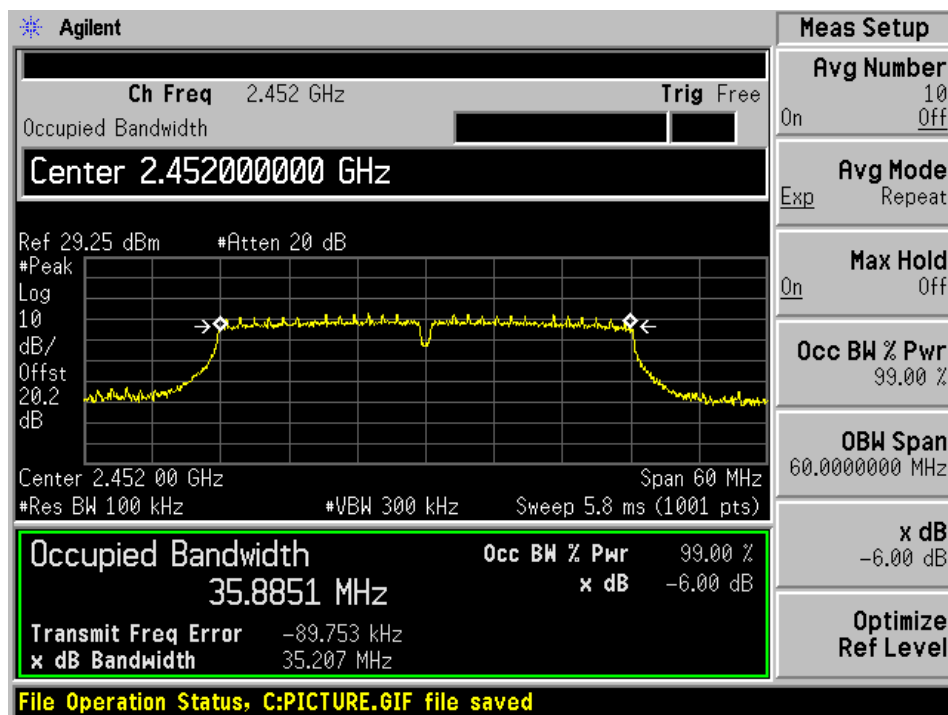
## Mid Channel 99% dB OBW Antenna A



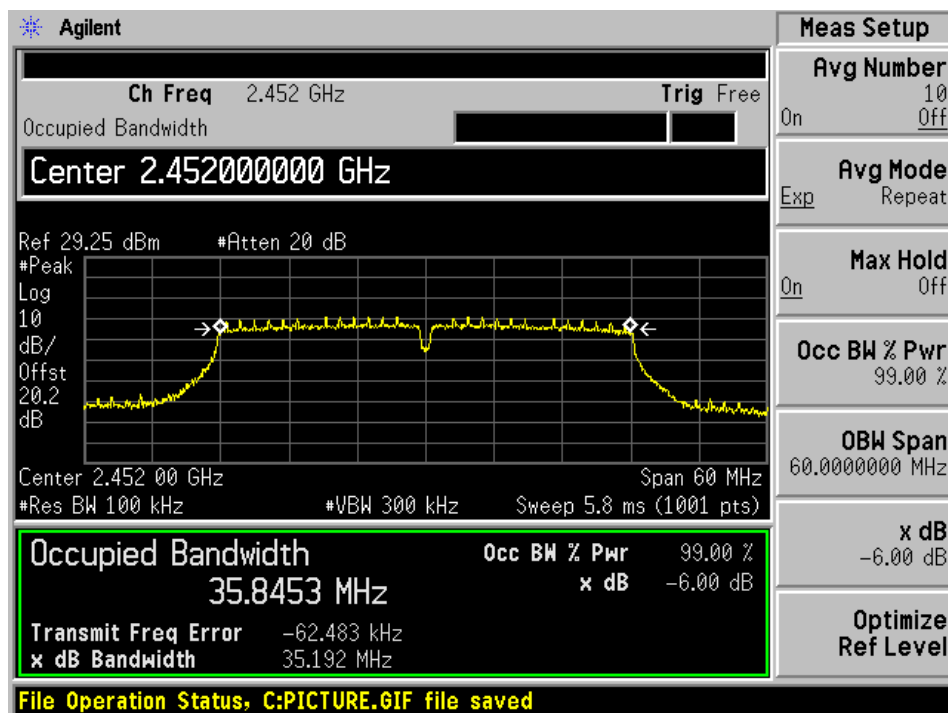
## Mid Channel 99% dB OBW Antenna B



## High Channel 6 dB OBW Antenna A

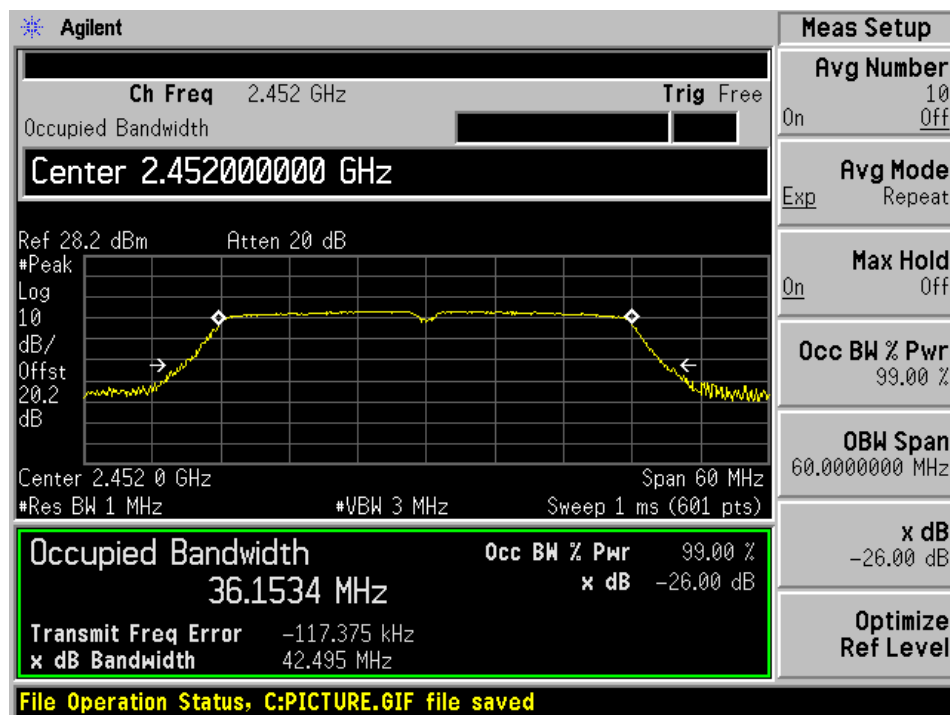


## High Channel 6 dB OBW Antenna B

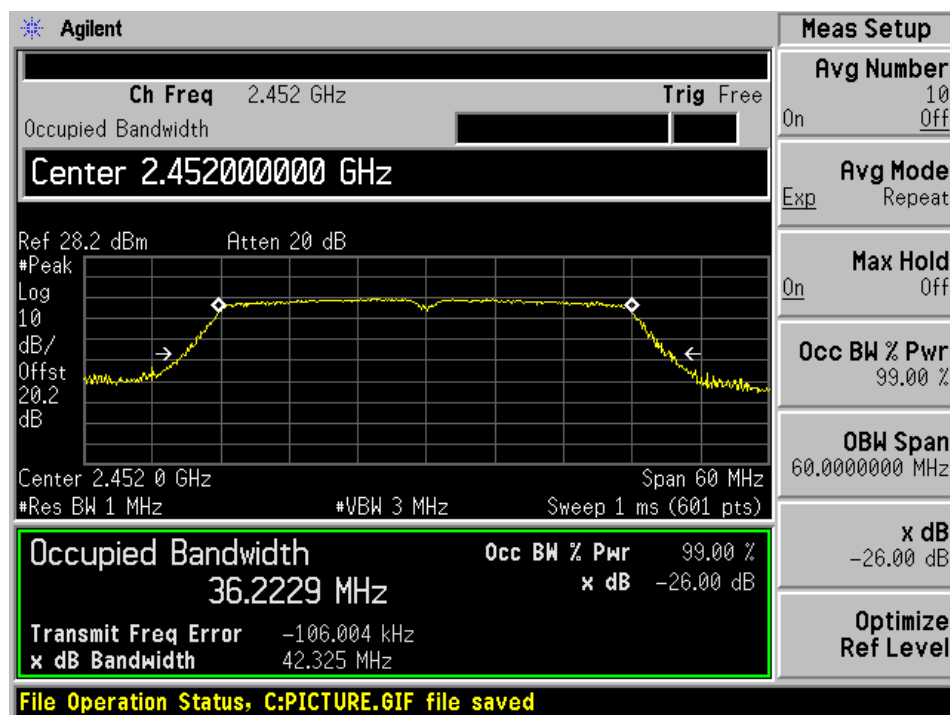




## High Channel 99% dB OBW Antenna A



## High Channel 99% dB OBW Antenna B



## 9 FCC §15.247(b) (3) - Output Power Measurement

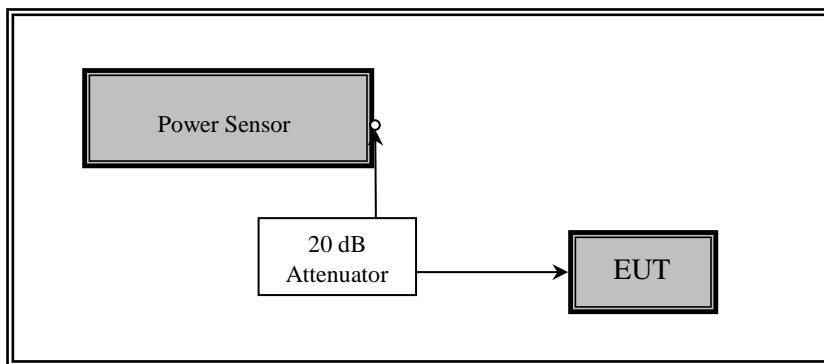
### 9.1 Applicable Standards

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

### 9.2 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

### 9.3 Test Setup Block Diagram



### 9.4 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20 dB attenuator	-	-	Each time <sup>1</sup>	N/A
ETS- Lingerin	Power Sensor	7002-006	160097	2021-02-12	2 years

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 9.5 Test Environmental Conditions

<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

The testing was performed by Rita Yang on 2021-05-11 in RF site.

## 9.6 Test Results

Channel	Frequency (MHz)	Conducted Output Power (dBm)			Output Power Limit (dBm)	Result
		Antenna A	Antenna B	Total		
802.11 n40						
Low	2422	14.0240	12.0518	16.16	29	Pass
Middle	2437	24.1723	23.6107	26.91	29	Pass
High	2452	14.9014	13.1454	17.12	29	Pass

Note: When the directional gain is greater than 6dBi, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain for 802.11n40 mode is 6.19 dBi calculated based on method specified in KDB 662911 D01.

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

## 10 FCC §15.247(d)– 100 kHz Bandwidth of Band Edges

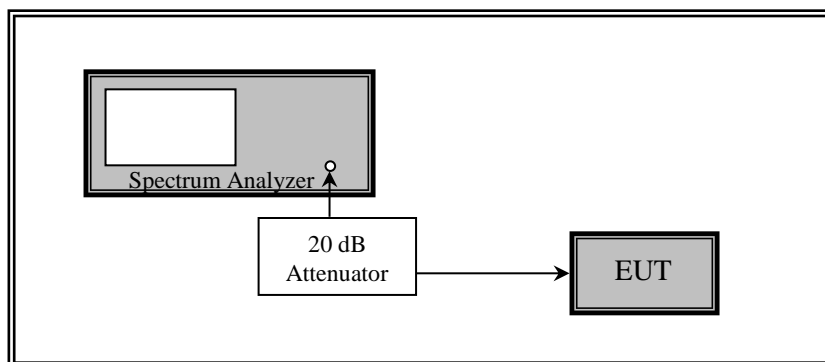
### 10.1 Applicable Standards

According to ECFR §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum 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. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

### 10.2 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 13: Band-edge measurements

### 10.3 Test Setup Block Diagram



### 10.4 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	MY48250238	2021-02-12	18 months
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20 dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 10.5 Test Environmental Conditions

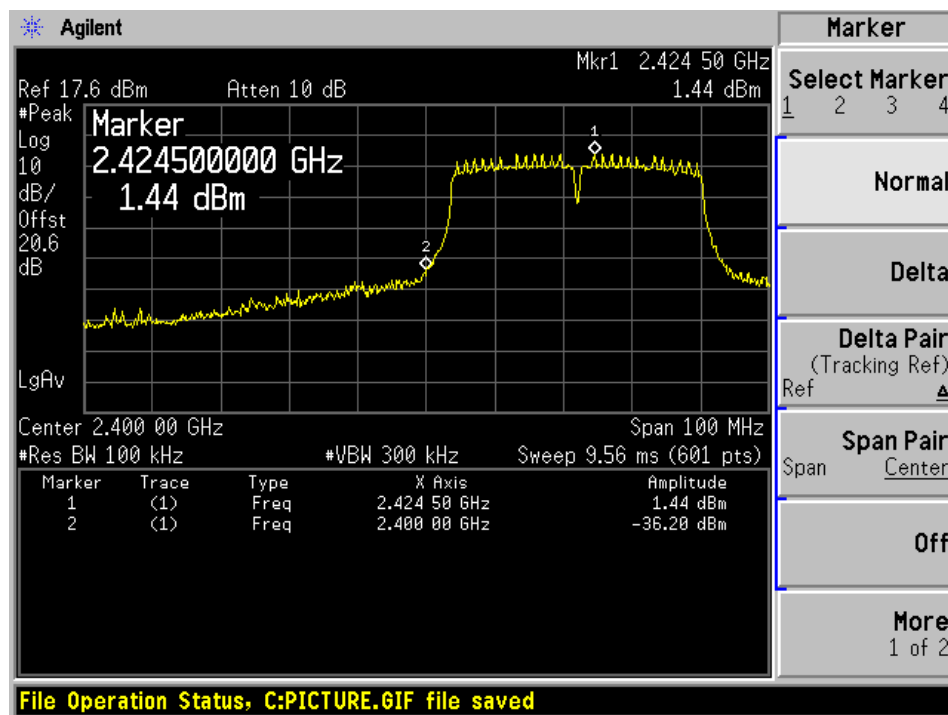
<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

*The testing was performed by Rita Yang on 2021-05-10 in RF site.*

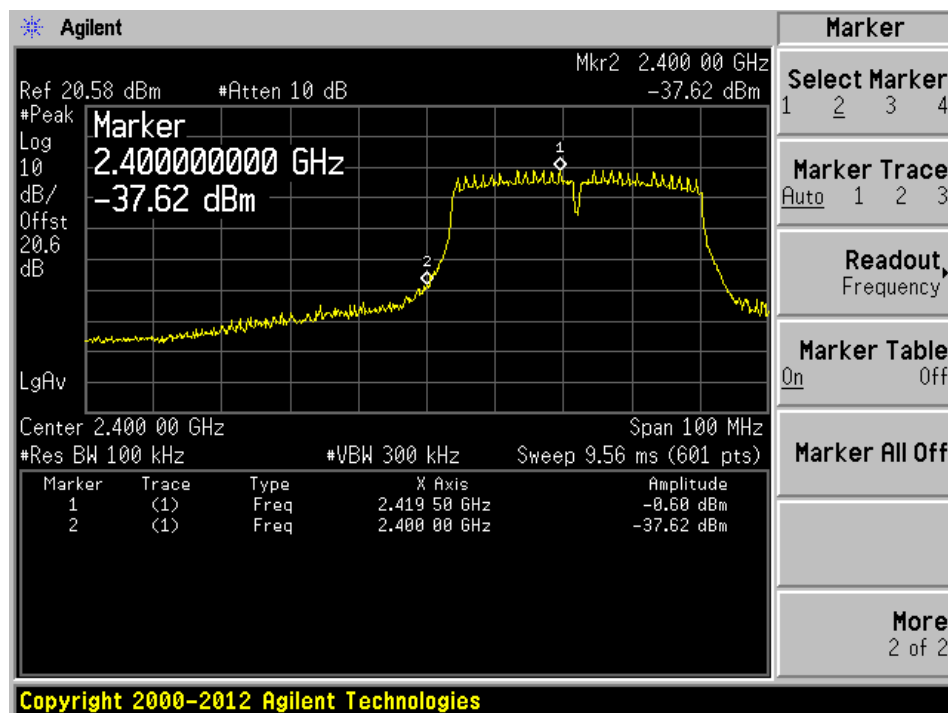
## 10.6 Test Results

### 802.11 n40 mode

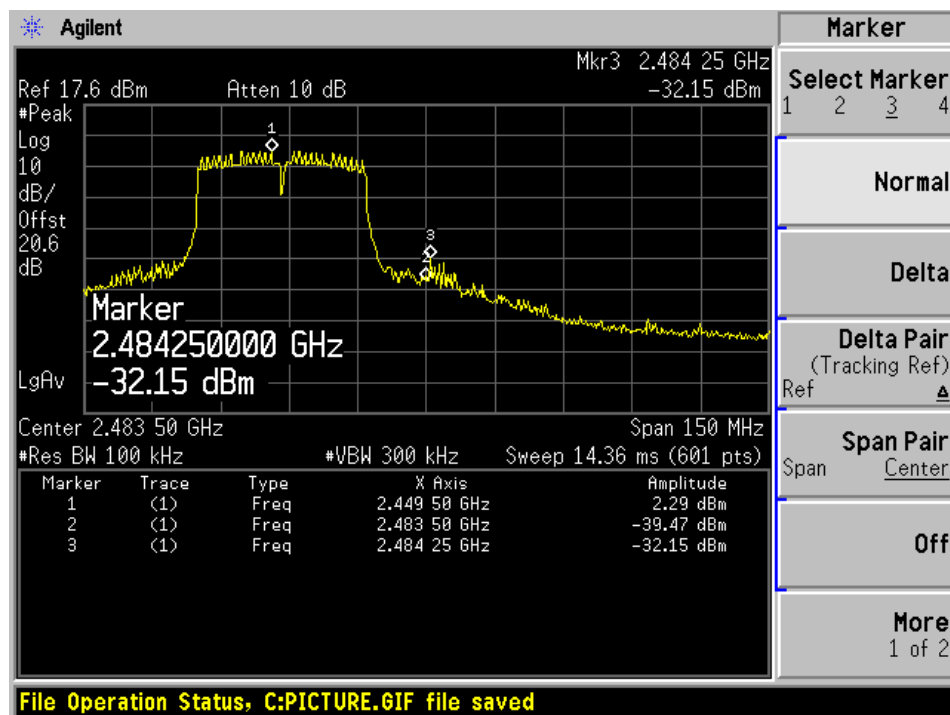
#### Low Channel Antenna A



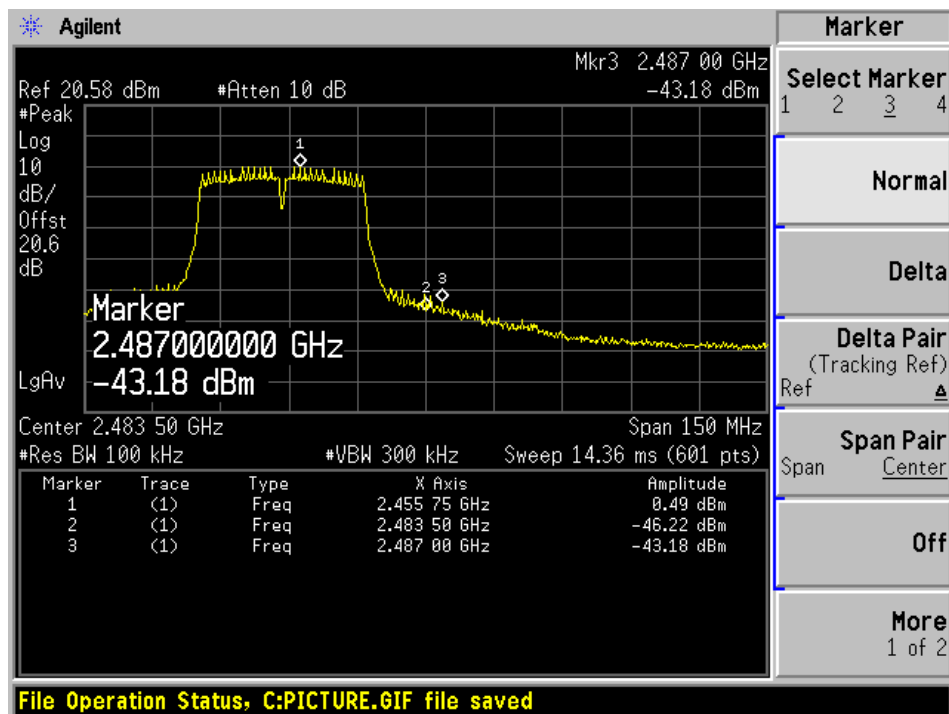
#### Low Channel Antenna B



## High Channel Antenna A



## High Channel Antenna B



## 11 FCC §15.247(e) – Power Spectral Density

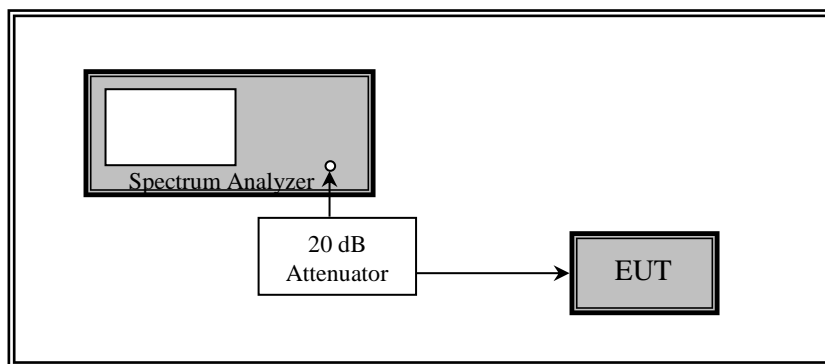
### 11.1 Applicable Standards

According to ECFR §15.247(e), for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

### 11.2 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 10: Maximum power spectral density level in the fundamental emission.

### 11.3 Test Setup Block Diagram



### 11.4 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	MY48250238	2021-02-12	18 months
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20 dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 “A2LA Policy on Metrological Traceability”.



## 11.5 Test Environmental Conditions

<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

*The testing was performed by Rita Yang on 2021-05-10 in RF site.*

## 11.6 Test Results

Channel	Frequency (MHz)	PSD (dBm/3kHz)			Limit (dBm/3Khz)	Result
		Corrected PSD (Antenna A)	Corrected PSD (Antenna B)	Combined Total		
802.11 n40						
Low	2422	-13.34	-14.88	-11.03	7	Pass
Middle	2437	-1.41	-2.87	0.93	7	Pass
High	2452	-11.63	-13.76	-9.56	7	Pass

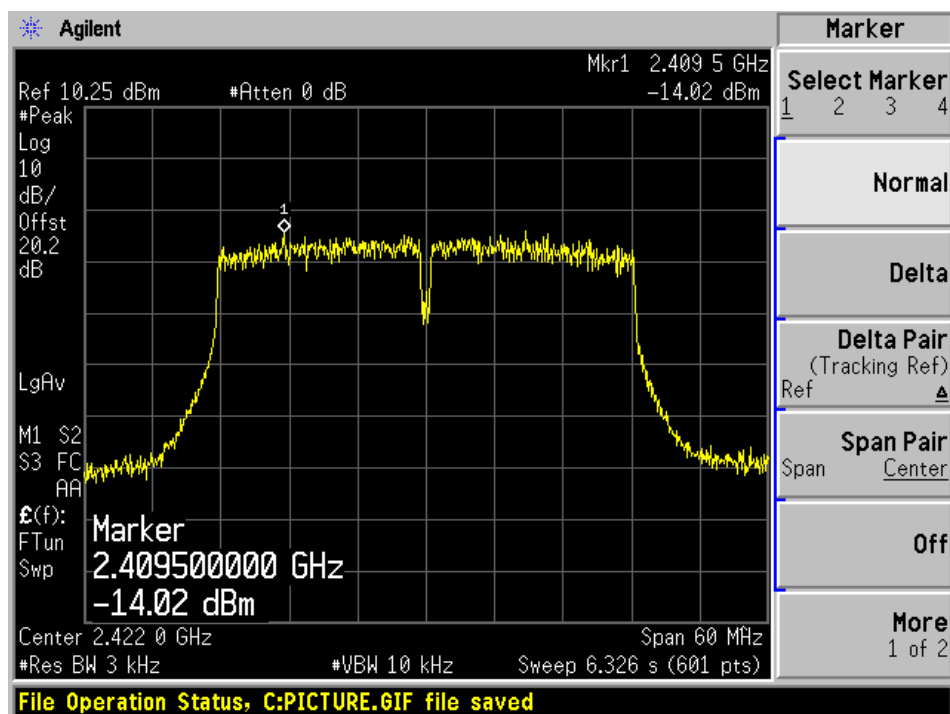
Corrected PSD considers an applied Duty Cycle Correction (dB)  
 Combined Total is the sum of the two Antenna port measurements.

Note: When the directional gain is greater than 6dBi, similar to the total conducted output power, the total power spectrum density shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain for 802.11n40 mode is 6.19 dBi calculated based on method specified in KDB 662911 D01.

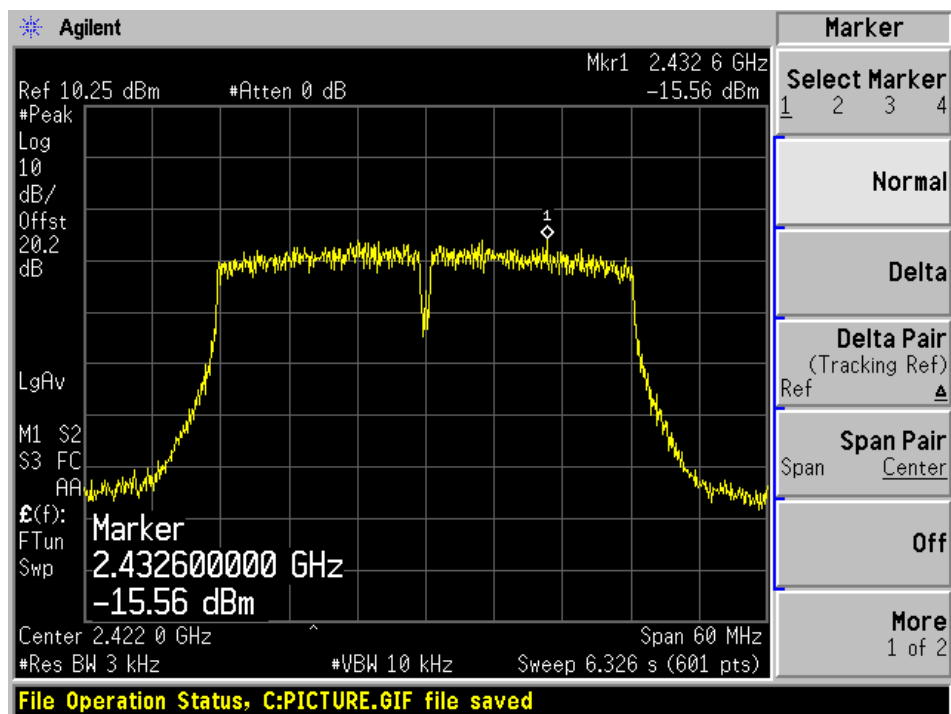
Please refer to the following plots for detailed test results

## 802.11n40 mode

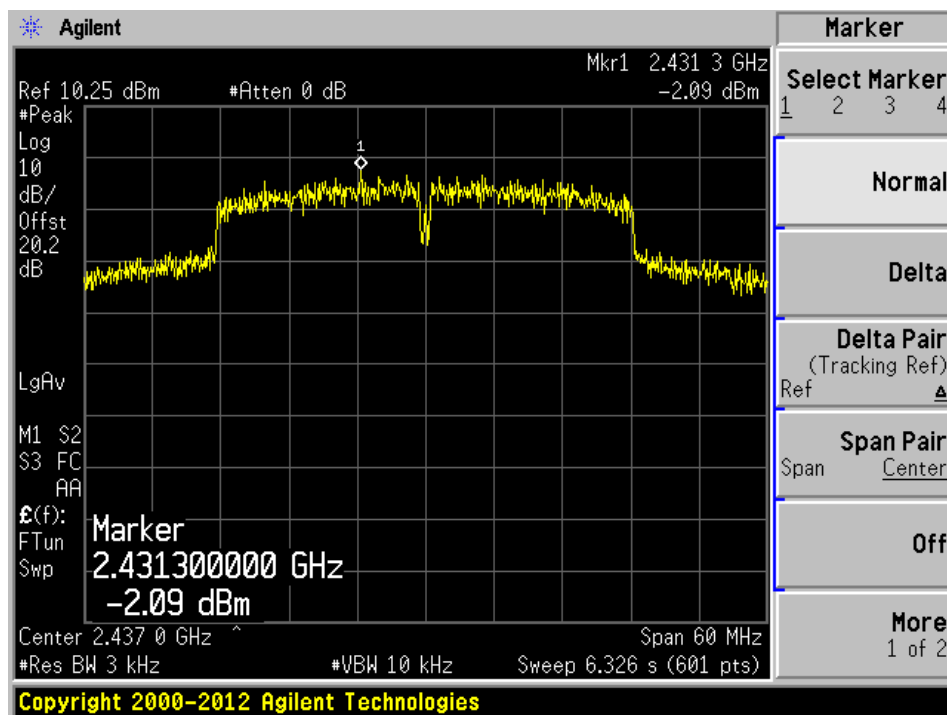
## Low Channel Antenna A



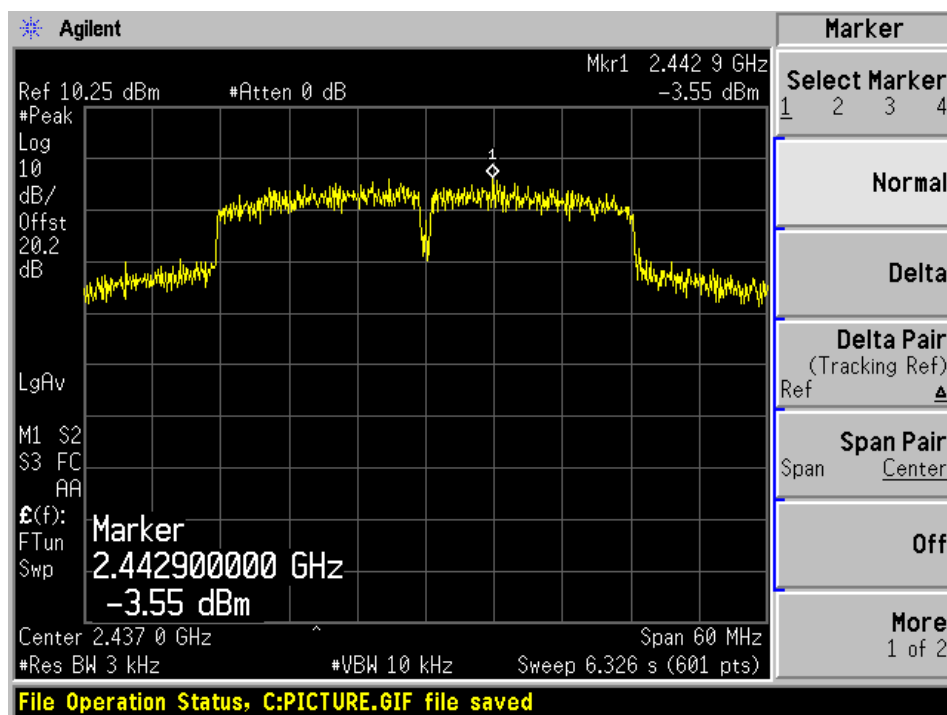
## Low Channel Antenna B



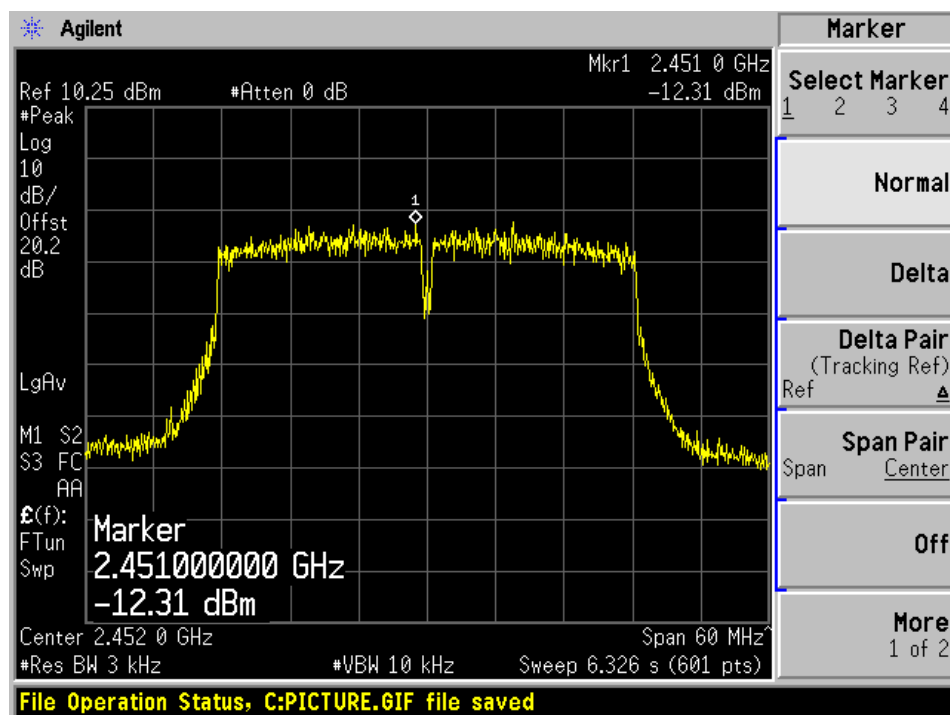
## Mid Channel Antenna A



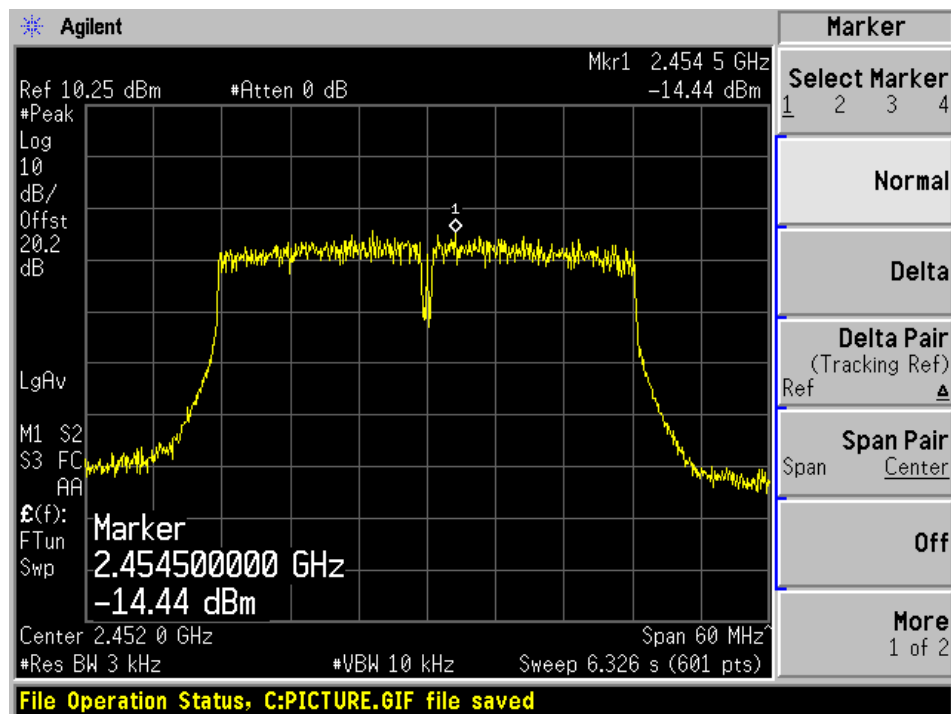
## Mid Channel Antenna B



## High Channel Antenna A



## High Channel Antenna B



## 12 FCC §15.247(d) – Spurious Emissions at Antenna Terminals

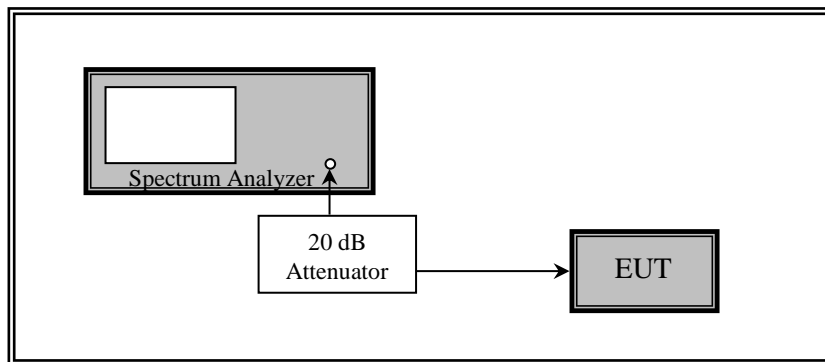
### 12.1 Applicable Standards

For ECFR §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)).

### 12.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

### 12.3 Test Setup Block Diagram



## 12.4 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	MY48250238	2021-02-12	18 months
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20 dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

## 12.5 Test Environmental Conditions

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

The testing was performed by Rita Yang on 2021-05-10 in RF site.

## 12.6 Test Results

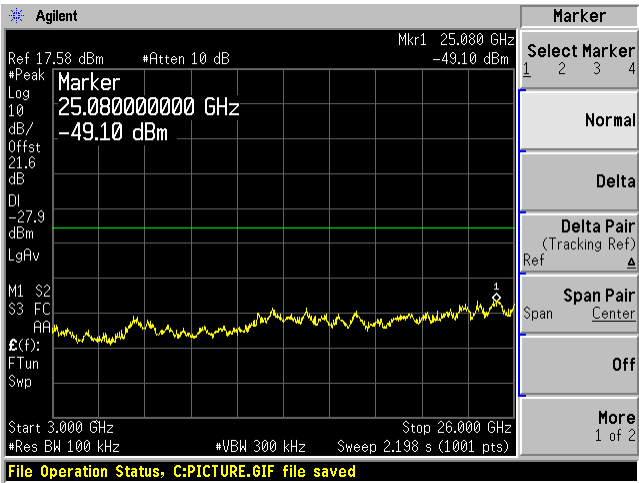
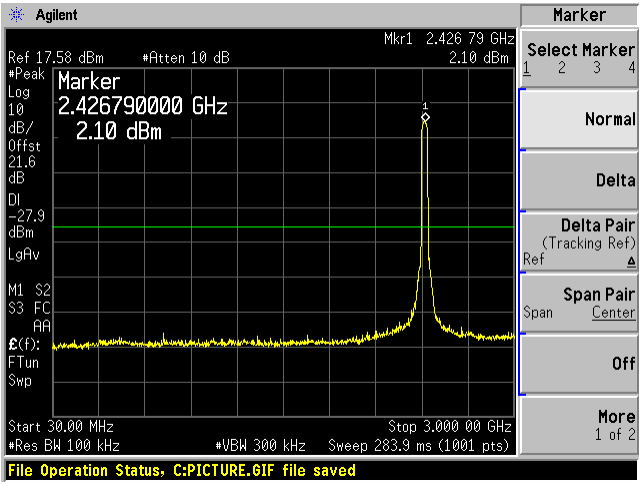
Please refer to following plots.

802.11 n40 mode

Antenna A Low Channel 2422MHz

30MHz – 3GHz

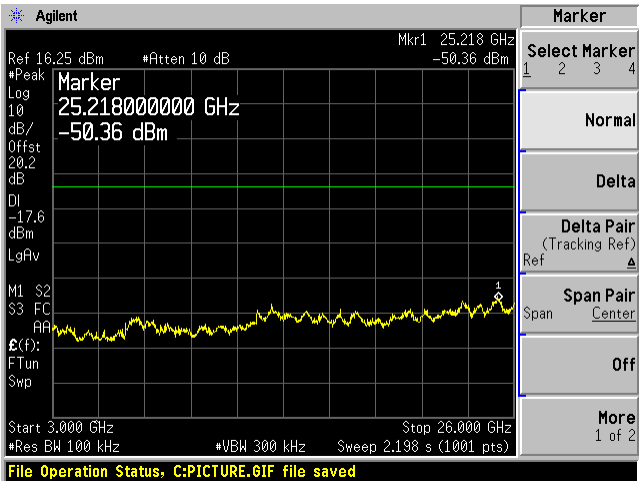
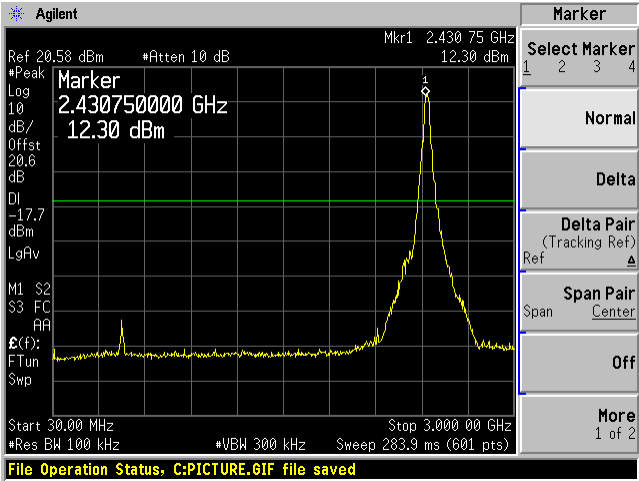
3GHz – 26GHz



Antenna A Mid Channel 2437MHz

30MHz – 3GHz

3GHz – 26GHz

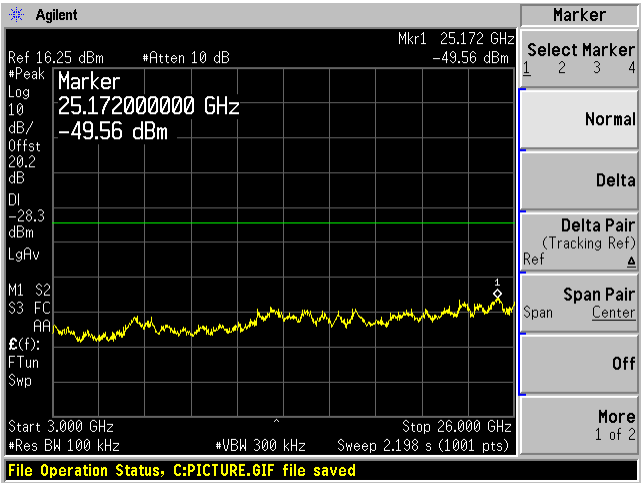
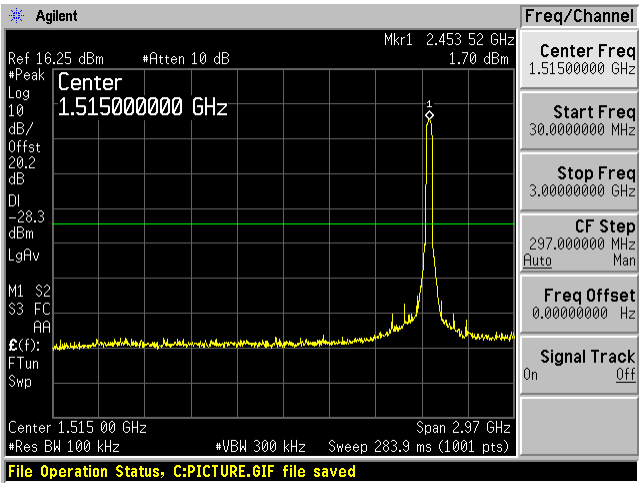




Antenna A High Channel 2452MHz

30MHz – 3GHz

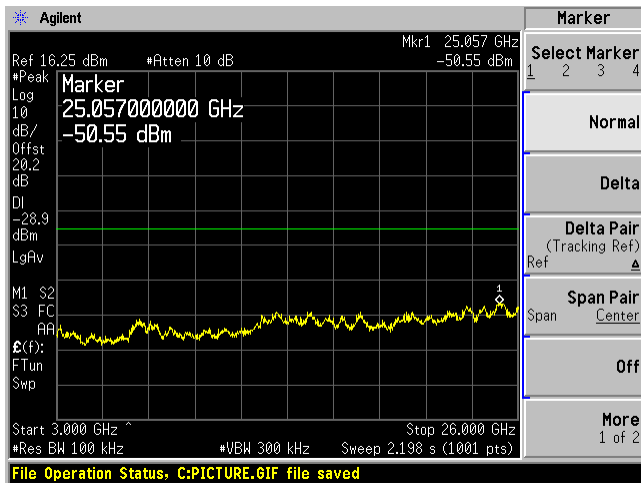
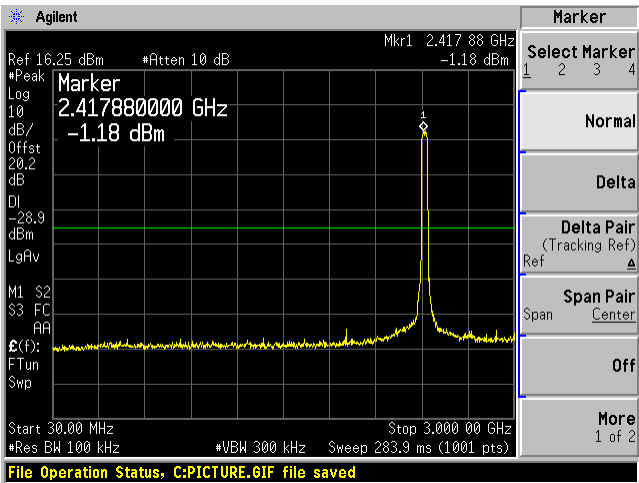
3GHz – 26GHz



Antenna B Low Channel 2422MHz

30MHz – 3GHz

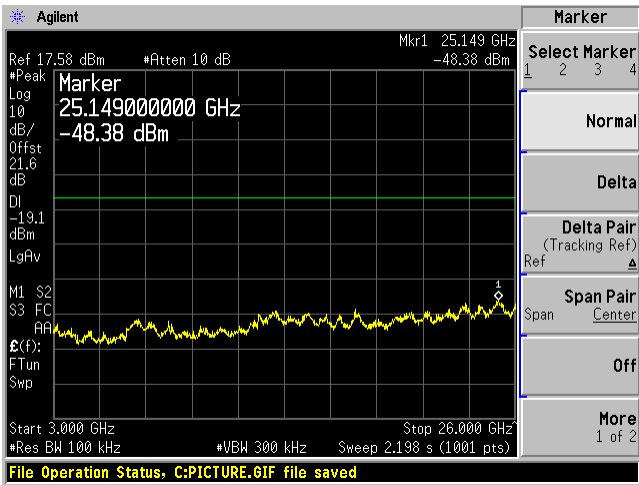
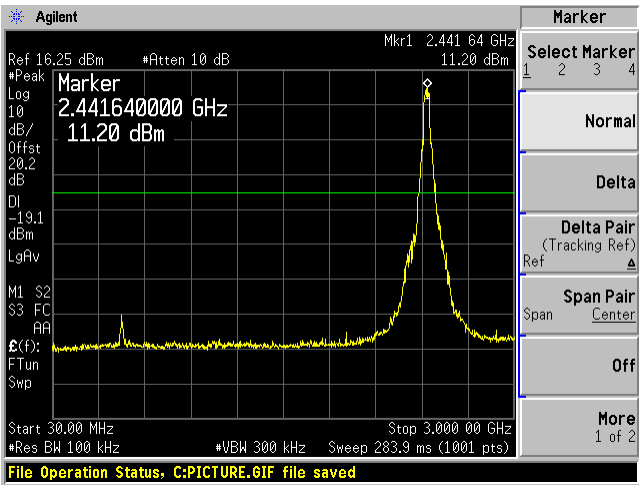
3GHz – 26GHz



Antenna B Mid Channel 2437MHz

30MHz – 3GHz

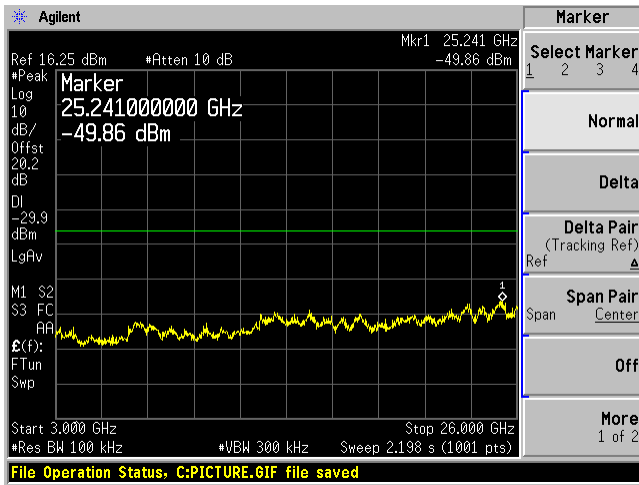
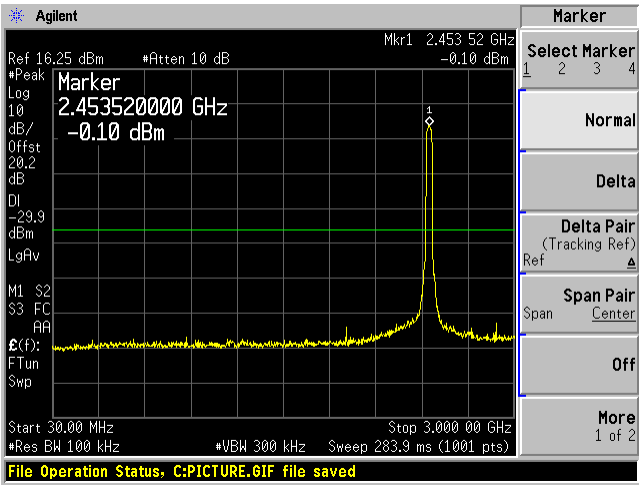
3GHz – 26GHz



Antenna B High Channel 2452MHz

30MHz – 3GHz

3GHz – 26GHz



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## **13 Annex A (Normative) – EUT Test Setup Photographs**

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Please refer to the attachment.

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## **14 Annex B (Normative) – EUT External Photographs**

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Please refer to the attachment.

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## **15 Annex C (Normative) – EUT Internal Photographs**

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Please refer to the attachment.

**16 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 17025:2017 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 10<sup>th</sup> day of March 2021.

A blue ink signature of Trace McInturf.

Trace McInturf, Vice President, Accreditation Services  
For the Accreditation Council  
Certificate Number 3297.02  
Valid to September 30, 2022

*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 ---**