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MEASUREMENT REPORT FCC Part 15.407 802.11a/ax/be WiFi 6GHz

Applicant Name:

Microsoft Corporation
1 Microsoft Way
Redmond, WA 98052-8300
United States

Date of Testing:

1/2/2025 - 1/31/2025

Test Report Issue Date:

3/28/2025

Test Site/Location:

Element Lab., Columbia, MD, USA

Test Report Serial No.:

1M2503050023-11-R1.C3K

FCC ID:**C3K00002101****APPLICANT:****Microsoft Corporation****Application Type:**

Class II Permissive Change, Module Host Integration

Host Model:

2109

EUT Type:

Limited Modular Approval – Host Integration

Frequency Range:

5935 – 7115MHz

Modulation Type:

OFDM, OFDMA

FCC Classification:

15E 6GHz Low Power Dual Client (6CD)

FCC Rule Part(s):

Part 15 Subpart E (15.407)

Test Procedure(s):

ANSI C63.10-2013, KDB 987594 D02 v01r01,
KDB 648474 D03 v01r04

Permissive Change(s):

Please see change document

This equipment has been shown to be capable of compliance with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures specified in ANSI C63.10-2013. Test results reported herein relate only to the item(s) tested.

This revised Test Report (S/N: 1M2503050023-11-R1.C3K) supersedes and replaces the previously issued test report on the same subject device for the same type of testing as indicated. Please discard or destroy the previously issued test report(s) and dispose of it accordingly.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

RJ Ortanez
Executive Vice President



CERT #2041.01

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)		Approved by: Technical Manager
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1.0 INTRODUCTION

1.1 Scope

Measurement and determination of electromagnetic emissions (EMC) of radio frequency devices including intentional and\or unintentional radiators for compliance with the technical rules and regulations of the Federal Communications Commission and the Innovation, Science and Economic Development Canada.

1.2 Element Test Location

Measurements were conducted at the Element laboratory(ies) indicated in Section 1.3 below. All measurement facilities are compliant with the test site requirements specified in ANSI C63.4-2014 and KDB 414788 D01 v01r01.

1.3 Test Facility / Accreditations

Measurements were performed at Element lab located in Columbia, MD 21046, U.S.A. ("MD")

- Element Washington DC LLC is an ISO 17025-2017 accredited test facility under the American Association for Laboratory Accreditation (A2LA) with Certificate number 2041.01 for Specific Absorption Rate (SAR), Hearing Aid Compatibility (HAC) testing, where applicable, and Electromagnetic Compatibility (EMC) testing for FCC and Innovation, Science, and Economic Development Canada rules.
- Element Washington DC LLC TCB is a Telecommunication Certification Body (TCB) accredited to ISO/IEC 17065-2012 by A2LA (Certificate number 2041.03) in all scopes of FCC Rules and ISED Standards (RSS).
- Element Washington DC LLC facility is a registered (2451B) test laboratory with the site description on file with ISED.
- Element Washington DC LLC is a Recognized U.S. Certification Assessment Body (CAB # US0110) for ISED Canada as designated by NIST under the U.S. and Canada Mutual Recognition Agreements (MRAs).

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2.0 PRODUCT INFORMATION

2.1 Equipment Description

The Equipment Under Test (EUT) is the **Microsoft Module (FCC ID: C3K00002101)** integrated into the **Portable Computing Device Model 2109**. The test data contained in this report pertains only to the emissions due to the EUT's UNII transmitter.

This host device (2109) contains a WLAN/BT transmitter module previously certified under FCC ID: C3K00002101. No changes have been made to the module and therefore all conducted testing performed on the original module remain applicable to this filing. This test report covers additional test cases for integrating the module transmitter into this host product.

Test Device Serial No.: 0F3K4CP24453Q6, 0F3K4CT24453Q6, 0F3K4CW24453Q6, 0F3K4CK24453Q6

2.2 Device Capabilities

This device contains the following capabilities:

Bluetooth (1x, EDR, LE), 802.11b/g/n/ac/ax/be WLAN, 802.11a/n/ac/ax/be UNII (5GHz and GHz), Wireless Power Transfer, NFC

Band 5		Band 6		Band 7		Band 8	
Ch.	Frequency (MHz)						
2	5935	97	6435	117	6535	189	6895
:	:	:	:	:	:	:	:
45	6175	105	6475	149	6695	209	6995
:	:	:	:	:	:	:	:
93	6415	113	6515	185	6875	233	7115

Table 2-1. 802.11a/ax/be (20MHz) Frequency / Channel Operations

Band 5		Band 6		Band 7		Band 8	
Ch.	Frequency (MHz)						
3	5965	99	6445	123	6565	187	6885
:	:	:	:	:	:	:	:
43	6165	107	6485	155	6725	211	7005
:	:	:	:	:	:	:	:
91	6405	115	6525	179	6845	227	7085

Table 2-2. 802.11ax/be (40MHz BW) Frequency / Channel Operations

Band 5		Band 6		Band 7		Band 8	
Ch.	Frequency (MHz)						
7	5985	103	6465	119	6545	199	6945
:	:			:	:	:	:
39	6145			151	6705		
:	:			:	:		
87	6385			183	6865		

Table 2-3. 802.11ax/be (80MHz BW) Frequency / Channel Operations

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Band 5		Band 6		Band 7		Band 8	
Ch.	Frequency (MHz)						
15	6025	111	6505	143	6665	207	6985
47	6185			175	6825		
79	6345						

Table 2-4. 802.11ax/be (160MHz BW) Frequency / Channel Operations

Band 5		Band 6		Band 7		Band 8	
Ch.	Frequency (MHz)						
31	6105	95	6425	127	6585	191	6905
63	6265			159	6745		

Table 2-5. 802.11be (320MHz BW) Frequency / Channel Operations

Notes:

1. 6GHz NII operation is possible in 20MHz, 40MHz, 80MHz, 160MHz, and 320MHz channel bandwidths. The maximum achievable duty cycles for all modes were determined based on measurements performed on a spectrum analyzer in zero-span mode with RBW = 8MHz, VBW = 50MHz, and detector = peak per the guidance of Section B2(b) of ANSI C63.10-2013. The RBW and VBW were both greater than 50/T, where T is the minimum transmission duration, and the number of sweep points across T was greater than 100. The duty cycles are as follows:

802.11 Mode/Band		MIMO (1+2)	
		Duty Cycle [%]	
6GHz	a	98.63	
	ax (HE20)	99.24	
	be (EHT20)	99.63	
	ax (HE40)	98.74	
	be (EHT40)	98.69	
	ax (HE80)	98.75	
	be (EHT80)	98.88	
	ax (HE160)	98.87	
	be (EHT160)	98.89	
	be (EHT320)	97.95	

Table 2-6. Measured Duty Cycles

2. The device employs MIMO technology. Below are the possible configurations.

WiFi Configurations		SISO		CDD		SDM	
		ANT1	ANT2	ANT1	ANT2	ANT1	ANT2
6GHz	11a	✓	✓	✓	✓	✗	✗
	11ax	✓	✓	✓	✓	✓	✓
	11be	✓	✓	✓	✓	✓	✓

Table 2-7. Antenna / Technology Configurations

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✓ = Support; ✗ = NOT Support

SISO = Single Input Single Output

SDM = Spatial Diversity Multiplexing – MIMO function

CDD = Cyclic Delay Diversity – 2Tx Function

3. The device supports the following data rates (shown in Mbps):

802.11a	MCS Index	Spatial Stream	OFDM (802.11ax/be)															
			20MHz			40MHz			80MHz			160MHz			320MHz			
			0.8µs GI	1.6µs GI	3.2µs GI	0.8µs GI	1.6µs GI	3.2µs GI	0.8µs GI	1.6µs GI	3.2µs GI	0.8µs GI	1.6µs GI	3.2µs GI	0.8µs GI	1.6µs GI	3.2µs GI	
6	0	0	1	8.6	8.1	7.3	17.2	16.3	14.6	36	34	30.6	72.1	68.1	61.3	144.1	136.1	122.5
9	1	1	1	17.2	16.3	14.6	34.4	32.5	29.3	72.1	68.1	61.3	144.1	136.1	122.5	288.2	272.2	245
12	2	2	1	25.8	24.4	21.9	51.6	48.8	43.9	108.1	102.1	91.9	216.2	204.2	183.8	432.4	408.3	367.5
18	3	3	1	34.4	32.5	29.3	68.8	65	58.5	144.1	136.1	122.5	288.2	272.2	245	576.5	544.4	490
24	4	4	1	51.6	48.8	43.9	108.2	97.5	87.8	216.2	204.2	183.8	432.4	408.3	367.5	864.7	816.7	735
36	5	5	1	68.8	65	58.5	137.6	130	117	288.2	272.2	245	576.5	544.4	490	1152.9	1088.9	980
48	7	6	1	77.4	73.1	65.8	154.9	146.3	131.6	324.3	306.3	275.6	648.5	612.5	551.3	1297.1	1225	1102.5
54	7	1	86	81.3	73.1	172.1	162.5	146.3	360.3	340.3	306.3	720.6	680.6	612.5	1441.2	1361.1	1225	
	8	1	103.2	97.5	87.8	206.5	195	175.5	432.4	408.3	367.5	864.7	816.7	735	1729.4	1633.3	1470	
	9	1	114.7	108.3	97.5	229.4	216.7	195	480.4	453.7	408.3	960.8	907.4	816.7	1921.6	1814.8	1633.3	
	10	1	129	121.9	109.7	258.1	243.8	219.4	540.4	510.4	459.4	1080.9	1020.8	918.8	2161.8	2041.7	1837.5	
	11	1	143.4	135.4	121.9	286.8	270.8	243.8	600.5	567.1	510.4	1201	1134.3	1020.8	2402	2268.5	2041.7	
	12	1	154.9	146.3	131.6	309.7	292.5	263.8	648.5	612.5	551.3	1297.1	1225	1102.5	2594.1	2450	2205	
	13	1	172.1	162.5	146.3	344.1	325	292.5	720.6	680.6	612.5	1441.2	1361.1	1225	2882.4	2722.2	2450	
6	8	0	2	17.2	16.3	14.6	34.4	32.5	29.3	72.1	68.1	61.3	144.1	136.1	122.5	288.2	272.2	245
9	9	1	2	34.4	32.5	29.3	68.8	65	58.5	144.1	136.1	122.5	288.2	272.2	245	576.5	544.4	490
12	10	2	2	51.6	48.8	43.9	103.2	97.5	87.8	216.2	204.2	183.8	432.4	408.3	367.5	864.7	816.7	735
18	11	3	2	68.8	65	58.5	137.6	130	117	288.2	272.2	245	576.5	544.4	490	1152.9	1088.9	980
24	12	4	2	103.2	97.5	87.8	206.5	195	175.5	432.4	408.3	367.5	864.7	816.7	735	1729.4	1633.3	1470
36	13	5	2	137.6	130	117	275.3	260	234	576.5	544.4	490	1152.9	1088.9	980	2305.9	2177.8	1960
48	14	6	2	154.9	146.3	131.6	309.7	292.5	263.3	648.5	612.5	551.3	1297.1	1225	1102.5	2594.1	2450	2205
54	15	7	2	172.1	162.5	146.3	344.1	325	292.5	720.6	680.6	612.5	1441.2	1361.1	1225	2882.4	2722.2	2450
	8	2	206.5	195	175.5	412.9	390	351	864.7	816.7	735	1729.4	1633.3	1470	3458.8	3266.7	2940	
	9	2	229.4	216.7	195	458.8	433.3	390	960.8	907.4	816.7	1921.6	1814.8	1633.3	3843.1	3629.6	3266.7	
	10	2	258.1	243.8	219.4	516.2	487.5	438.8	1080.9	1020.8	918.8	2161.8	2041.7	1837.5	4323.5	4083.3	3675	
	11	2	286.8	270.8	243.8	573.5	541.7	487.5	1201	1134.3	1020.8	2402	2268.5	2041.7	4803.9	4537	4083.3	
	12	2	309.7	292.5	263.3	619.4	585	526.5	1297.1	1225	1102.5	2594.1	2450	2205	5188.2	4900	4410	
	13	2	344.1	325	292.5	688.2	650	585	1441.2	1361.1	1225	2882.4	2722.2	2450	5764.7	5444.4	4900	

Table 2-8. Supported Data Rates

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2.3 Antenna Description

The following antenna gains are used in this device per the "Unlicensed Band Antenna Gain" document provided by the client. This document is also included in the filing as a public exhibit.

	Ant1 Peak Gain [dBi]	Ant2 Peak Gain [dBi]	Measured Directional Gain [dBi]
5925 – 6425 MHz	5.87	4.94	7.08
6425 – 6525 MHz	3.93	4.35	7.08
6525 – 6875 MHz	3.78	3.92	6.55
6875 – 7125 MHz	2.74	3.78	5.91

Table 2-9. Antenna Peak Gain

The antenna gains shown in this table were provided by the manufacturer.

2.4 Test Configuration

The EUT was tested per the guidance of ANSI C63.10-2013 and KDB 987594 D02 v01r01. ANSI C63.10-2013 was used to reference the appropriate EUT setup for radiated spurious emissions testing and AC line conducted testing. See Sections 3.2 for AC line conducted emissions test setups, 3.3 for radiated emissions test setups.

This device supports operation under control of either a low-power indoor access point or standard power access point. The worst-case emissions data is shown in this report.

This device operates in the 5.925-7.125 GHz band when under control of a low power indoor access point. Additionally, the device may operate in the 5.925-6.425 GHz and 6.525-6.875 GHz bands when under control of a standard power access point.

2.5 Software and Firmware

The test was conducted with firmware version 1.0.4166.1200 installed on the EUT.

2.6 EMI Suppression Device(s) / Modifications

No EMI suppression device(s) were added and/or no modifications were made during testing.

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3.0 DESCRIPTION OF TESTS

3.1 Evaluation Procedure

The measurement procedures described in the American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices (ANSI C63.10-2013) and the guidance provided in KDB 987594 D02 v01r01 were used in the measurement of the EUT.

Deviation from measurement procedure.....**None**

3.2 AC Line Conducted Emissions

The line-conducted facility is located inside a 10'x16'x9' shielded enclosure. The shielded enclosure is manufactured by ETS Lindgren RF Enclosures. The shielding effectiveness of the shielded room is in accordance with MIL-Std-285 or NSA 65-5. A 1m x 1.5m wooden table 80cm high is placed 40cm away from the vertical wall and 80cm away from the sidewall of the shielded room. Two 10kHz-30MHz, 50Ω/50µH Line-Impedance Stabilization Networks (LISNs) are bonded to the shielded room floor. Power to the LISNs is filtered by external high-current high-insertion loss power line filters. The external power line filter is an ETS Lindgren Model LPRX-4X30 (100dB Attenuation, 14kHz-18GHz) and the two EMI/RFI filters are ETS Lindgren Model LRW-2030-S1 (100dB Minimum Insertion Loss, 14kHz – 10GHz). These filters attenuate ambient signal noise from entering the measurement lines. These filters are also bonded to the shielded enclosure.

The EUT is powered from one LISN and the support equipment is powered from the second LISN. If the EUT is a DC-powered device, power will be derived from the source power supply it normally will be powered from and this supply line(s) will be connected to the second LISN. All interconnecting cables more than 1 meter were shortened to a 1 meter length by non-inductive bundling (serpentine fashion) and draped over the back edge of the test table. All cables were at least 40cm above the horizontal reference groundplane. Power cables for support equipment were routed down to the second LISN while ensuring that that cables were not draped over the second LISN.

Sufficient time for the EUT, support equipment, and test equipment was allowed in order for them to warm up to their normal operating condition. The RF output of the LISN was connected to the spectrum analyzer and exploratory measurements were made to determine the frequencies producing the maximum emission from the EUT. The spectrum was scanned from 150kHz to 30MHz with a spectrum analyzer. The detector function was set to peak mode for exploratory measurements while the bandwidth of the analyzer was set to 10kHz. The EUT, support equipment, and interconnecting cables were arranged and manipulated to maximize each emission. Once the worst case emissions have been identified, the one EUT cable configuration/arrangement and mode of operation that produced these emissions is used for final measurements on the same test site. The analyzer is set to CISPR quasi-peak and average detectors with a 9kHz resolution bandwidth for final measurements.

Line conducted emissions test results are shown in Section 7.2.2. The EMI Receiver mode of the Agilent MXE was used to perform AC line conducted emissions testing.

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3.3 Radiated Emissions

The radiated test facilities consisted of an indoor 3-meter semi-anechoic chamber used for final measurements and exploratory measurements, when necessary. The measurement area is contained within the semi-anechoic chamber which is shielded from any ambient interference. The test site inside the chamber is a 6m x 5.2m elliptical, obstruction-free area in accordance with Figure 5.7 of Clause 5 in ANSI C63.4-2014. Absorbers are arranged on the floor between the turn table and the antenna mast in such a way so as to maximize the reduction of reflections for measurements above 1GHz. An 80cm tall test table made of Styrodur is placed on top of the turn table. For measurements above 1GHz, an additional Styrodur pedestal is placed on top of the test table to bring the total table height to 1.5m.

For all measurements, the spectrum was scanned through all EUT azimuths and from 1 to 4 meter receive antenna height using a broadband antenna from 30MHz up to the upper frequency shown in 15.33 depending on the highest frequency generated or used in the device or on which the device operates or tunes. For frequencies above 1GHz, linearly polarized double ridge horn antennas were used. For frequencies below 30MHz, a calibrated loop antenna was used. When exploratory measurements were necessary, they were performed at 1 meter test distance inside the semi-anechoic chamber using broadband antennas, broadband amplifiers, and spectrum analyzers to determine the frequencies and modes producing the maximum emissions. Sufficient time for the EUT, support equipment, and test equipment was allowed for them to warm up to their normal operating condition. The test set-up was placed on top of the 1 x 1.5 meter table. The EUT, support equipment, and interconnecting cables were arranged and manipulated to maximize each emission. Appropriate precautions were taken to ensure that all emissions from the EUT were maximized and investigated. The system configuration, mode of operation, turntable azimuth, and receive antenna height were noted for each frequency found.

Final measurements were made in the semi-anechoic chamber using calibrated, linearly polarized broadband and horn antennas. The test setup was configured to the setup that produced the worst-case emissions. The spectrum analyzer was set to investigate all frequencies required for testing to compare the highest radiated disturbances with respect to the specified limits. The turntable containing the EUT was rotated through 360 degrees and the height of the receive antenna was varied 1 to 4 meters and stopped at the azimuth and height producing the maximum emission. Each emission was maximized by changing the orientation of the EUT through three orthogonal planes and changing the polarity of the receive antenna, whichever produced the worst-case emissions.

All radiated measurements are performed in a chamber that meets the site requirements per ANSI C63.4-2014. Additionally, radiated emissions below 30MHz are also validated on an Open Area Test Site to assert correlation with the chamber measurements per the requirements of KDB 414788 D01 v01r01.

3.4 Environmental Conditions

The temperature is controlled within range of 15°C to 35°C. The relative humidity is controlled within range of 10% to 75%. The atmospheric pressure is monitored within the range 86-106kPa (860-1060mbar).

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4.0 ANTENNA REQUIREMENTS

Excerpt from §15.203 of the FCC Rules/Regulations:

"An intentional radiator antenna shall be designed to ensure that no antenna other than that furnished by the responsible party can 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 antennas of the EUT are **permanently attached**.
- There are no provisions for connection to an external antenna.

Conclusion:

The EUT complies with the requirement of §15.203.

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5.0 MEASUREMENT UNCERTAINTY

The measurement uncertainties shown below were calculated in accordance with the requirements of ANSI C63.10-2013. All measurement uncertainty values are shown with a coverage factor of $k = 2$ to indicate a 95% level of confidence. The measurement uncertainty shown below meets or exceeds the U_{CISPR} measurement uncertainty values specified in CISPR 16-4-2 and, thus, can be compared directly to specified limits to determine compliance.

Contribution	Expanded Uncertainty (\pm dB)
Contention Based Protocol Conducted Measurements	0.86
Conducted Bench Top Measurements	1.13
Line Conducted Disturbance	3.09
Radiated Disturbance (<1GHz)	4.98
Radiated Disturbance (>1GHz)	5.07
Radiated Disturbance (>18GHz)	5.09

Table 5-1. Measurement Uncertainty Budget – MD

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6.0 TEST EQUIPMENT CALIBRATION DATA

Test Equipment Calibration is traceable to the National Institute of Standards and Technology (NIST). Measurements antennas used during testing were calibrated in accordance to the requirements of ANSI C63.5-2017.

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
-	WL25-1	Conducted Cable Set (25GHz)	4/2/2024	Annual	4/2/2025	WL25-1
-	MD 1M 18-40	EMC Cable and Switch System	4/3/2024	Annual	4/3/2025	AP1-002
-	AP1-002	EMC Cable and Switch System	4/4/2024	Annual	4/4/2025	ETS-001
-	ETS-001	EMC Cable and Switch System	4/5/2024	Annual	4/5/2025	ETS-002
-	ETS-002	EMC Cable and Switch System	4/6/2024	Annual	4/6/2025	MD 1M 18-40
ETS-Lindgren	3116C	Horn Antenna (18-40GHz)	2/27/2023	Biennial	2/27/2025	218893
Rohde & Schwarz	TC-TA18	Vivaldi Antenna	2/23/2023	Biennial	2/23/2025	26040036
Rohde & Schwarz	FSW26	Spectrum Analyzer (26.5GHz)	3/8/2024	Annual	3/8/2025	103187
Rohde & Schwarz	ESU26	EMI Test Receiver (26.5GHz)	10/16/2024	Annual	10/16/2025	100342
Rohde & Schwarz	ESU40	EMI Test Receiver (40GHz)	11/25/2024	Annual	11/25/2025	100348
Pasternack	NMLC-2	Line Condcted Emissions Cable	4/2/2024	Annual	4/2/2025	NMLC-2
Rohde & Schwarz	ENV216	Two-Line V-Network	1/31/2023	Biennial	1/31/2025	101379
Sunol	JB6	Bi-Log Antenna (20M-6GHz)	3/2/2023	Biennial	3/2/2025	A082816
Sunol	JB5	Bi-Log Antenna (20M-5GHz)	9/11/2024	Biennial	9/11/2026	A051107

Table 6-1. Test Equipment Calibration Table – MD

Note:

For equipment listed above that has a calibration date or calibration due date that falls within the test date range, care was taken to ensure that this equipment was used after the calibration date and before the calibration due date.

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7.0 TEST RESULTS

7.1 Summary

Company Name: Microsoft Corporation
 FCC ID: C3K00002101
 FCC Classification: 15E 6GHz Low Power Dual Client (6CD)

FCC Part Section(s)	RSS Section(s)	Test Description	Test Limit	Test Condition	Test Result	Reference
2.1046, 15.407(a)(11)	RSS-248(4.5)	Maximum Conducted Output Power	N/A	CONDUCTED	PASS	See Original Filing for Module
15.407(a)(8), 15.407(a)(7)	RSS-248(4.5)	Maximum Radiated Output Power	< 24dBm over the frequency band of operation <30dBm over the frequency band of operation when connecting to a standard power access point		PASS	See Original Filing for Module
2.1049, 15.407(a)(10)	RSS-248(4.4)	Occupied Bandwidth/ 26dB Bandwidth	99% of the occupied bandwidth of any channel must be contained within each of its respective U-NII sub bands. The maximum transmitter channel bandwidth for U-NII devices in the 5.925-7.125 GHz band is 320 megahertz.		PASS	See Original Filing for Module
15.407(a)(8), 15.407(a)(7)	RSS-248(4.5)	Maximum Power Spectral Density	< -1dBm/MHz e.i.r.p. <17dBm/MHz when operating with a standard power access point		PASS	See Original Filing for Module
15.407(b)(7)	RSS-248(4.6)	In-Band Emissions	EUT must meet the limits detailed in 15.407(b)(7)	RADIATED / CONDUCTED	PASS	See Original Filing for Module
15.407(d)(6)	RSS-248(4.7)	Contention Based Protocol	EUT must detect AWGN signal with 90% (or better) certainty		PASS	See CBP Report
15.407(b)(6)	RSS-248(4.6)	Undesirable Emissions	< -27dBm/MHz e.i.r.p. outside of the 5.925 – 7.125GHz band		PASS	Section 7.2
15.205, 15.209	RSS-Gen (8.9)	General Field Strength Limits (Restricted Bands and Radiated Emission Limits)	Emissions in restricted bands must meet the radiated limits detailed in 15.209		PASS	Section 7.2
15.407(b)(9)	RSS-Gen (8.8)	AC Conducted Emissions (150kHz – 30MHz)	< FCC 15.207 limits	LINE CONDUCTED	PASS	Section 7.3

Table 7-1. Summary of Test Results

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**Notes:**

- 1) All channels, modes, and modulations/data rates were investigated among all UNII bands. The test results shown in the following sections represent the worst-case emissions.
- 2) For band edge, automated test software was used to measure emissions and capture the corresponding plots necessary to show compliance. The measurement software utilized is Element "Chamber Automation," Version 1.3.1.
- 3) The test data shown in this report follows the test plan prepared by the Grantee after consultation with FCC. Also, additional measurements are included based on worst-case findings from the filing of the original module report.

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7.2 Emission Measurements

Test Overview and Limit

All out of band radiated spurious emissions are measured with a spectrum analyzer connected to a receive antenna while the EUT is operating at its maximum duty cycle, at its maximum power control level, as defined in ANSI C63.10-2013, and at the appropriate frequencies. All channels, modes (e.g. 802.11a, 802.11ax (20/40/80/160MHz), and modulations/data rates were investigated among all UNII bands. Only the radiated emissions of the configuration that produced the worst-case emissions are reported in this section.

For transmitters operating in the 5.925-7.125 GHz band: All emissions outside of the 5.925-7.125 GHz band shall not exceed an EIRP of -27dBm/MHz (68.2dBuV/m at a 3m distance). Emissions found in a restricted band are subject to the limits of 15.209 as shown in the table below.

Frequency	Field Strength [μ V/m]	Measured Distance [Meters]
0.009 – 0.490 MHz	2400F (kHz)	300
0.490 – 1.705 MHz	24000F (kHz)	30
1.705 – 30.00 MHz	30	30
30.00 – 88.00 MHz	100	3
88.00 – 216.0 MHz	150	3
216.0 – 960.0 MHz	200	3
Above 960.0 MHz	500	3

Table 7-2. Radiated Limits

Test Procedures Used

ANSI C63.10-2013 – Sections 12.7.7.2, 12.7.6, 12.7.5

Test Settings – Above 1GHz

Average Field Strength Measurements (Method AD – Average Detection)

1. Analyzer center frequency was set to the frequency of the radiated spurious emission of interest.
2. RBW = 1MHz
3. VBW = 3MHz
4. Detector = power average (RMS)
5. Number of measurement points = 1001 (Number of points must be $\geq 2 \times \text{span} \backslash \text{RBW}$)
6. Sweep time = auto
7. Trace (RMS) averaging was performed over at least 100 traces.

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Peak Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the radiated spurious emission of interest.
2. RBW = 1MHz
3. VBW = 3MHz
4. Detector = peak
5. Sweep time = auto couple
6. Trace mode = max hold
7. Trace was allowed to stabilize.

Test Settings – Below 1GHz

Quasi-Peak Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the radiated spurious emission of interest.
2. RBW = 120kHz (for emissions from 30MHz – 1GHz)
3. Detector = quasi-peak
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize.

Test Setup

The EUT and measurement equipment were set up as shown in the diagram below.

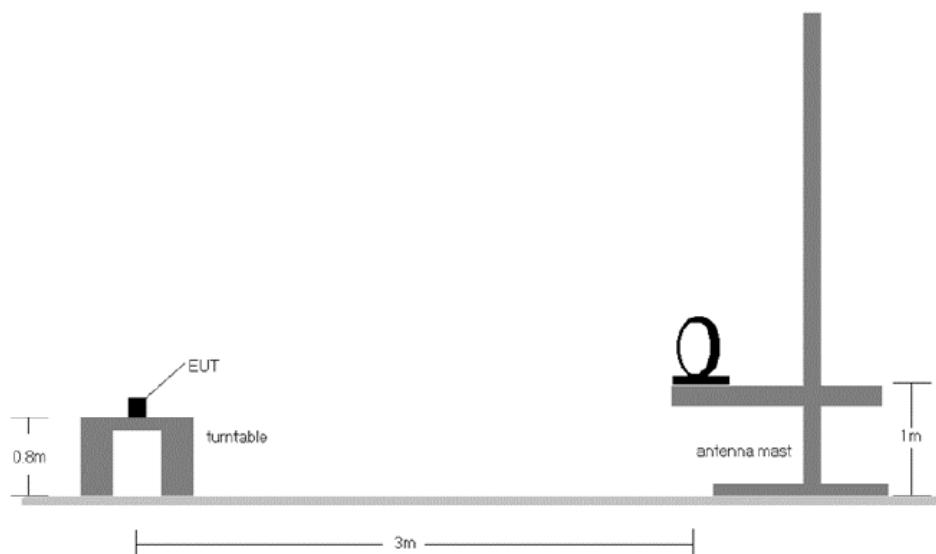


Figure 7-1. Radiated Test Setup < 30MHz

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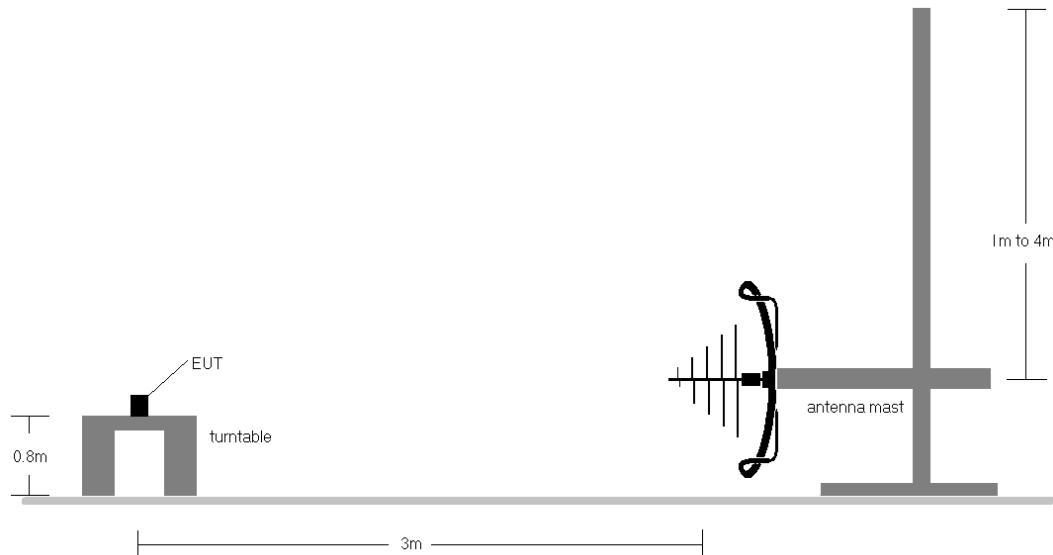


Figure 7-2. Radiated Test Setup < 1GHz

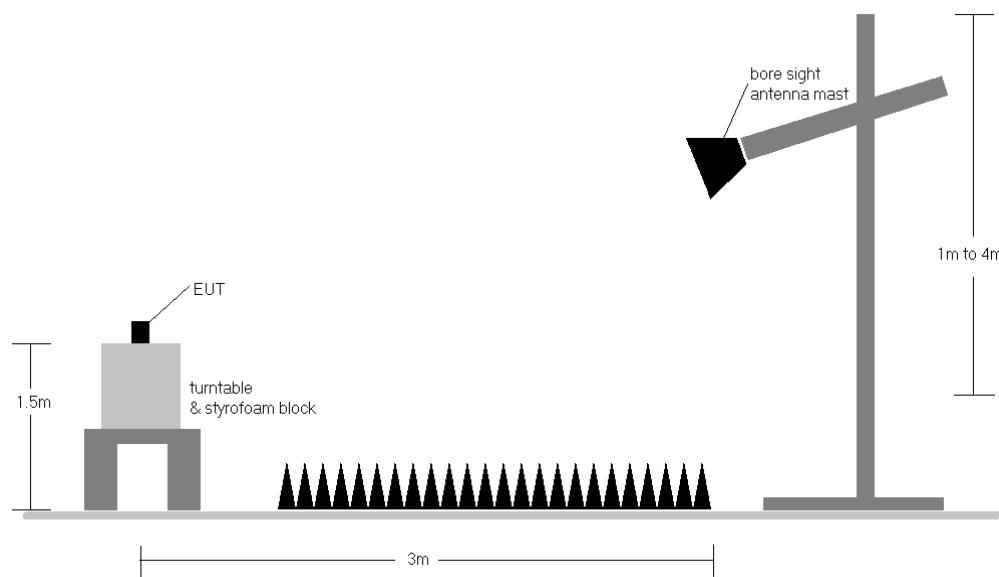


Figure 7-3. Radiated Test Setup > 1GHz



Figure 7-4. Conducted Test Setup > 1GHz

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Test Notes

1. All spurious emissions lying in restricted bands specified in §15.205 are below the limits specified in §15.209. All spurious emissions that do not lie in a restricted band are subject to an average limit of -27dBm/MHz. At 3 meters, the field strength limit in dB μ V/m can be determined by adding a "conversion" factor of 95.2dB to the EIRP limit of -27dBm/MHz to obtain the limit for out of band spurious emissions of 68.2dB μ V/m.
2. All spurious emissions that do not lie in a restricted band are subject to a peak limit not to exceed 20dB of the average limit [68.2dB μ V/m]. If a peak measurement passes the average limit, it was determined no further investigation is necessary.
3. The antenna is manipulated through typical positions, polarity, and length during the tests. The EUT is manipulated through three orthogonal planes.
4. This unit was tested with its standard battery.
5. The spectrum is measured from 9kHz to the 10th harmonic of the fundamental frequency of the transmitter using CISPR quasi peak detector below 1GHz. Above 1 GHz, average and peak measurements were taken using linearly polarized horn antennas. The worst-case emissions are reported, however emissions whose levels were not within 20dB of the respective limits were not reported.
6. Emissions below 18GHz were measured at a 3-meter test distance while emissions above 18GHz were measured at a 1-meter test distance with the application of a distance correction factor.
7. The wide spectrum spurious emissions plots shown on the following pages are used only for the purpose of emission identification. Any emissions found to be within 20dB of the limit are fully investigated and the results are shown in this section. The "-" shown in the following RSE tables are used to denote a noise floor measurement.
8. In the case where a peak-detector measurement passed the given RMS limit it was determined sufficient to demonstrate compliance.
9. The results recorded using the broadband antenna are known to correlate with the results obtained by using a tuned dipole with an acceptable degree of accuracy. The VSWR for the measurement antenna was found to be less than 2:1.
10. Restricted Band Edge testing was performed using a conducted setup per C63.10 12.7.4.2.

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Sample Calculations

Determining Spurious Emissions Levels

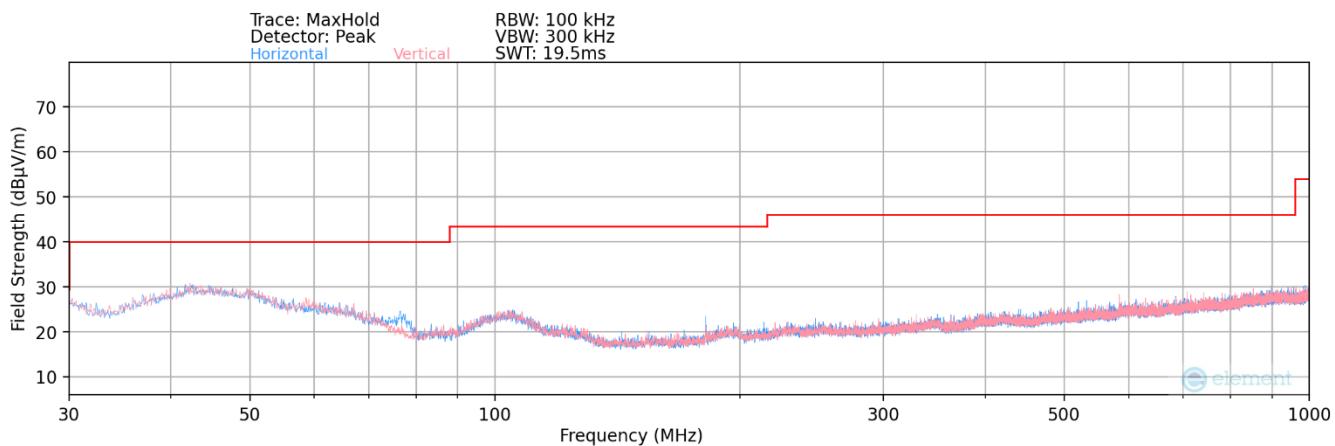
- Field Strength Level $[\text{dB}_{\mu\text{V/m}}]$ = Analyzer Level $[\text{dBm}] + 107 + \text{AFCL} [\text{dB/m}]$
- AFCL $[\text{dB/m}]$ = Antenna Factor $[\text{dB/m}] + \text{Cable Loss} [\text{dB}]$
- Margin $[\text{dB}]$ = Field Strength Level $[\text{dB}_{\mu\text{V/m}}] - \text{Limit} [\text{dB}_{\mu\text{V/m}}]$

Conducted Band Edge Field Strength Conversion

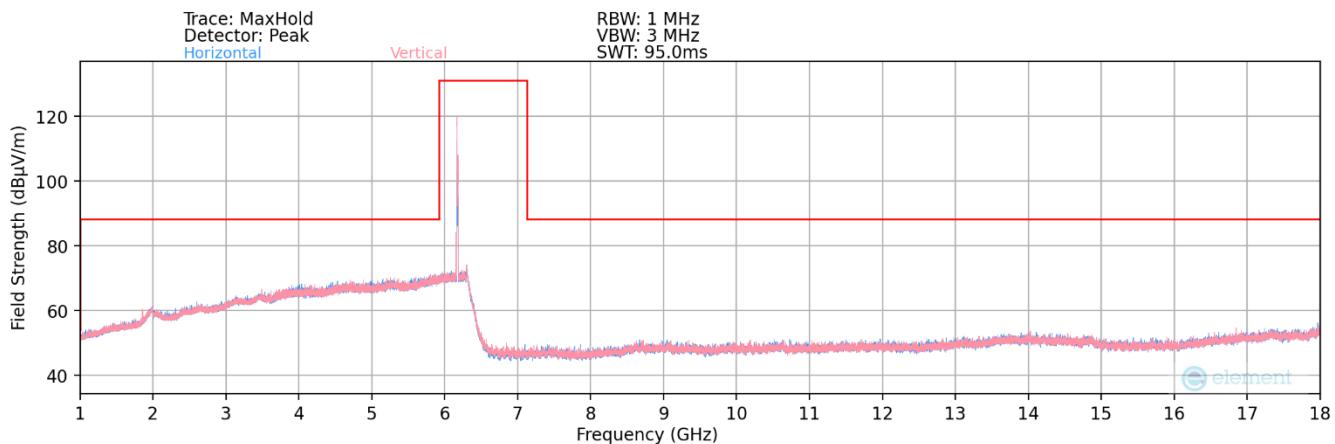
- Field Strength Level $[\text{dB}_{\mu\text{V/m}}]$ = EIRP $[\text{dBm}] + 95.2$

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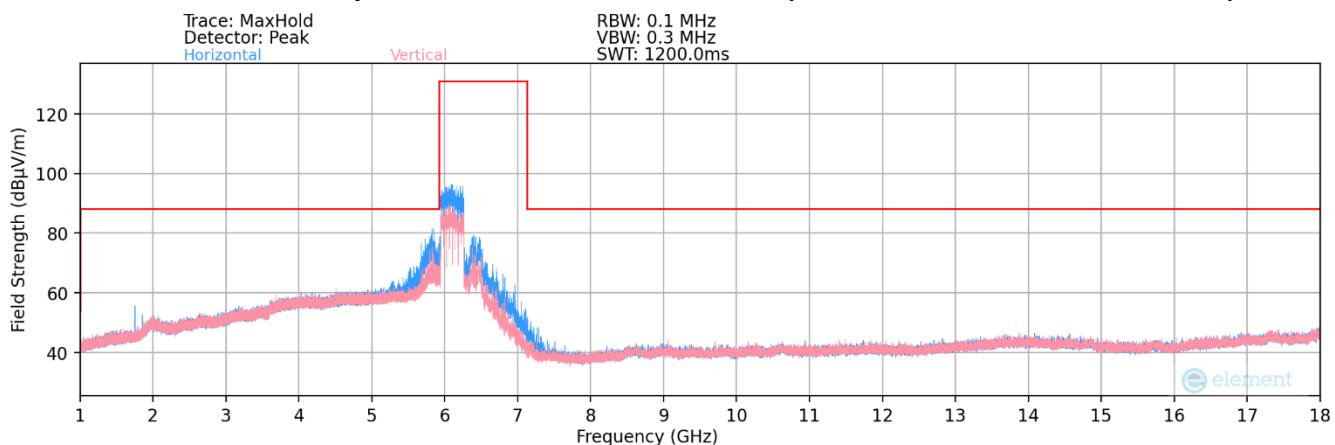
7.2.1 MIMO Radiated Spurious Emission Measurements



Plot 7-1. Radiated Spurious Plot below 1GHz MIMO (802.11be – Ch.49)

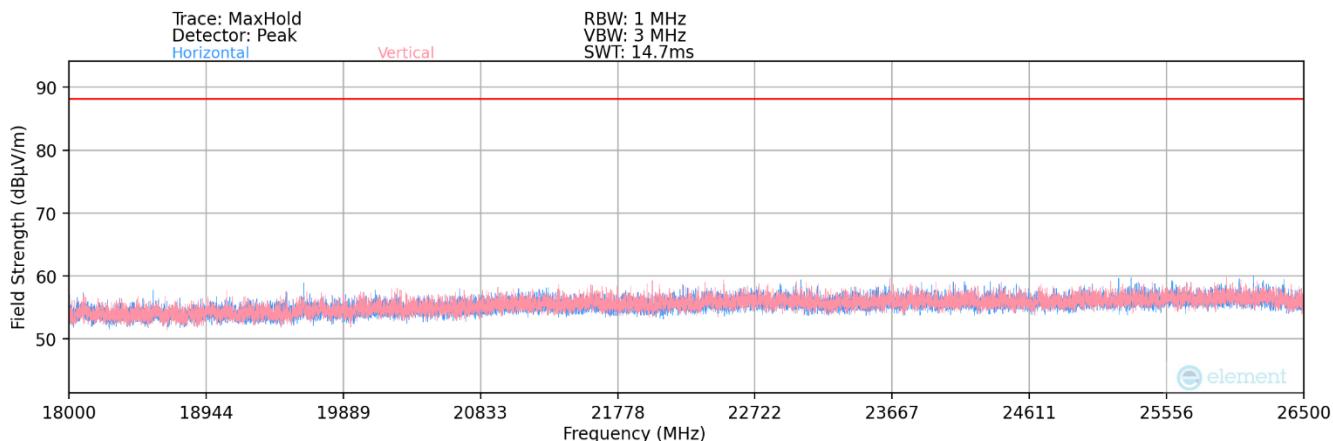


Plot 7-2. Radiated Spurious Plot 1GHz – 18GHz MIMO (802.11be – UNII Band 5 Ch. 49 52T)

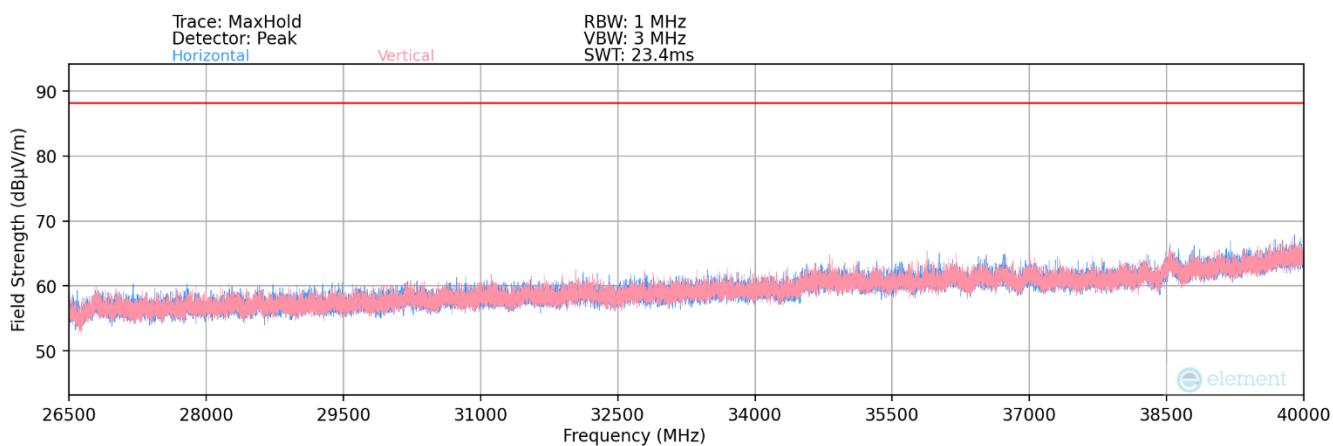


Plot 7-3. Radiated Spurious Plot 1GHz – 18GHz MIMO (802.11be – UNII Band 5 Ch. 31)

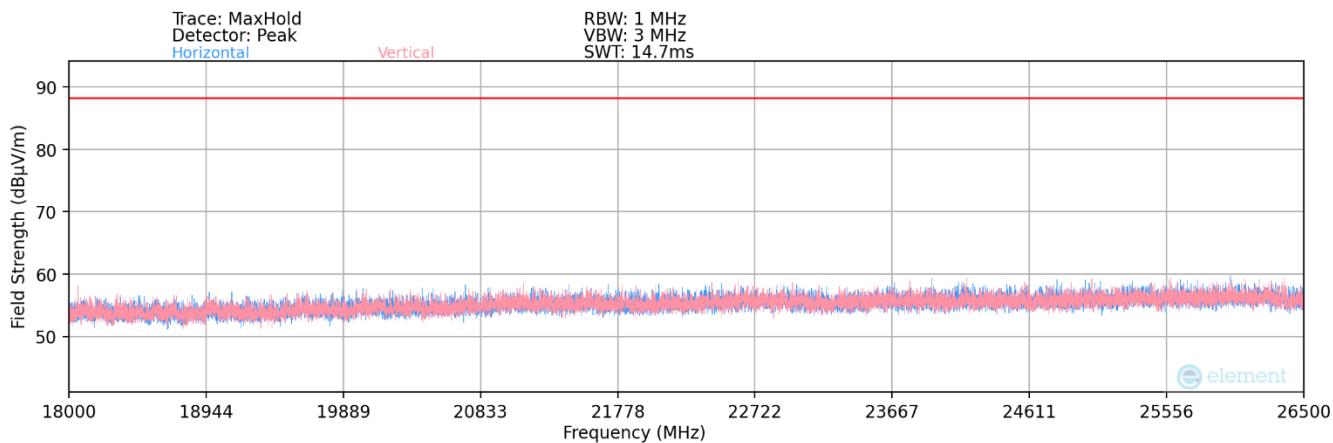
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Plot 7-4. Radiated Spurious Plot 18GHz - 26.5GHz (802.11be (20MHz 52T) Ch.40)

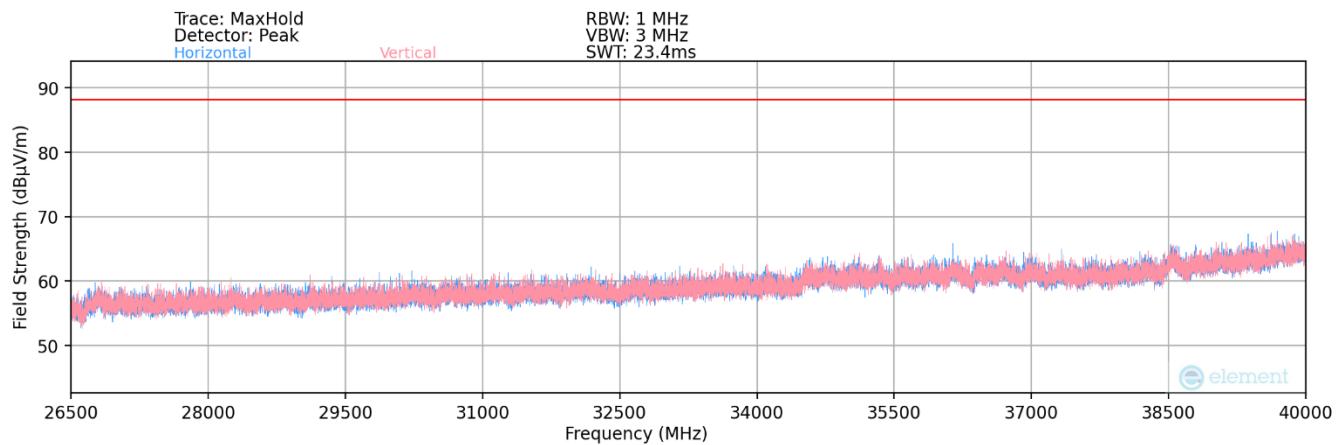


Plot 7-5. Radiated Spurious Plot 26.5GHz - 40GHz (802.11be(20MHz 52T) Ch.40)



Plot 7-6. Radiated Spurious Plot 18GHz - 26.5GHz (802.11be (320MHz) Ch.31)

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Plot 7-7. Radiated Spurious Plot 26.5GHz - 40GHz (802.11be(320MHz) Ch.31)

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MIMO Radiated Spurious Emission Measurements – UNII Band 5

Worst Case Mode:	802.11be
Worst Case Transfer Rate:	MCS0
Distance of Measurements:	1 & 3 Meters
Operating Frequency:	6195MHz
Channel:	49

Restricted	Frequency [MHz]	Detector	Ant. Pol. [H/V]	Antenna Height [cm]	Turntable Azimuth [degree]	Analyzer Level [dBm]	Distance Correction Factor [dB]	Field Strength [dB μ V/m]	Limit [dB μ V/m]	Margin [dB]
*	11870.00	Average	H	-	-	-87.55	0.00	42.43	53.98	-11.55
*	11870.00	Peak	H	-	-	-75.11	0.00	54.52	73.98	-19.46
*	17805.00	Average	H	-	-	-64.23	0.00	44.25	53.98	-9.73
*	17805.00	Peak	H	-	-	-55.14	0.00	53.34	73.98	-20.64
*	23740.00	Average	H	-	-	-64.98	-9.54	36.23	53.98	-17.75
*	23740.00	Peak	H	-	-	-55.32	-9.54	45.89	73.98	-28.09
	29675.00	Peak	H	-	-	-54.78	-9.54	49.16	68.20	-19.04

Table 7-3. Radiated Measurements MIMO

Frequency [MHz]	Detector	Ant. Pol. [H/V]	Antenna Height [cm]	Turntable Azimuth [degree]	Analyzer Level [dBm]	AFCL [dB/m]	Field Strength [dB μ V/m]	Limit [dB μ V/m]	Margin [dB]
200.00	Quasi-Peak	V	-	-	-71.59	-13.60	21.81	43.52	-21.71

Table 7-4. Radiated Measurements MIMO below 1GHz

Worst Case Mode:	802.11ax
Worst Case Transfer Rate:	MCS0
Distance of Measurements:	1 & 3 Meters
Operating Frequency:	6105MHz
Channel:	31

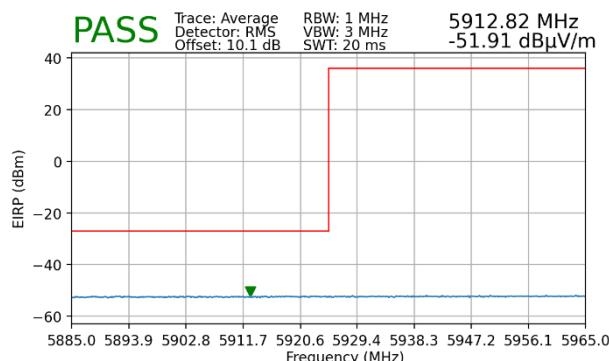
Restricted	Frequency [MHz]	Detector	Ant. Pol. [H/V]	Antenna Height [cm]	Turntable Azimuth [degree]	Analyzer Level [dBm]	Distance Correction Factor [dB]	Field Strength [dB μ V/m]	Limit [dB μ V/m]	Margin [dB]
*	12210.00	Average	H	-	-	-89.01	0.00	40.45	53.98	-13.53
*	12210.00	Peak	H	-	-	-76.21	0.00	53.25	73.98	-20.73
*	18315.00	Average	H	-	-	-66.21	-9.54	32.43	53.98	-21.55
*	18315.00	Peak	H	-	-	-56.41	-9.54	42.23	73.98	-31.75
	24420.00	Peak	H	-	-	-55.67	-9.54	45.54	68.20	-22.66
	30525.00	Peak	H	-	-	-55.43	-9.54	48.00	68.20	-20.20

Table 7-5. Radiated Measurements MIMO

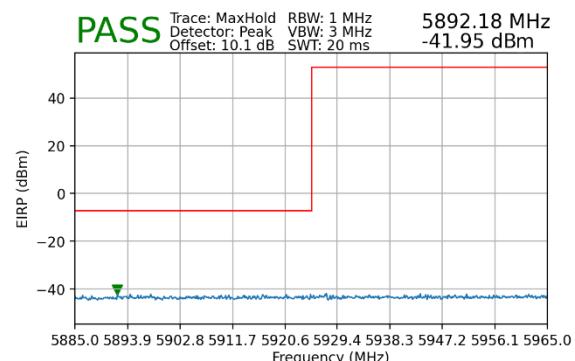
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7.2.2 MIMO Band Edge Measurements (20MHz BW)

Worst Case Mode: 802.11be
 Worst Case Transfer Rate: MCS0
 Distance of Measurements: 3 Meters
 Operating Frequency: 6175MHz
 Channel: 45
 RU: 37

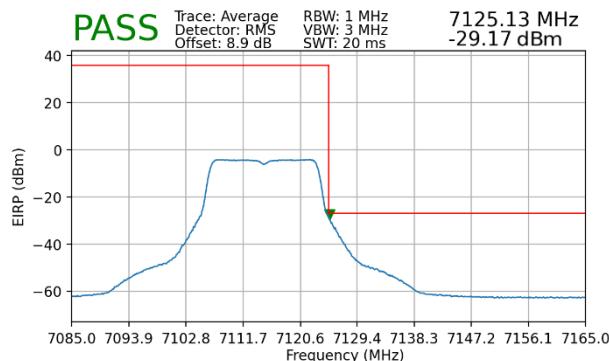


Plot 7-8. Lower Band Edge Plot MIMO (Average – UNII Band 5)

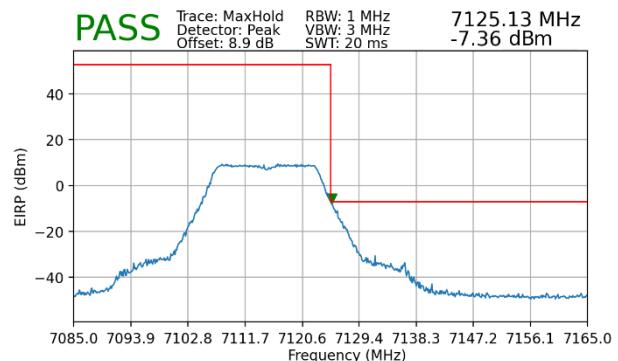


Plot 7-9. Lower Band Edge Plot MIMO (Peak – UNII Band 5)

Worst Case Mode: 802.11a
 Worst Case Transfer Rate: 6Mbps
 Distance of Measurements: 3 Meters
 Operating Frequency: 7115MHz
 Channel: 233



Plot 7-10. Upper Band Edge Plot MIMO (Average – UNII Band 8)

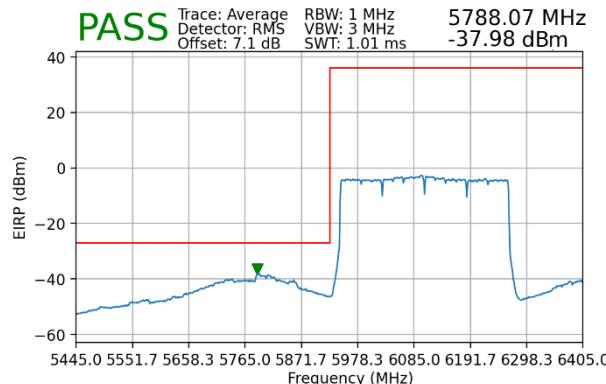


Plot 7-11. Upper Band Edge Plot MIMO (Peak – UNII Band 8)

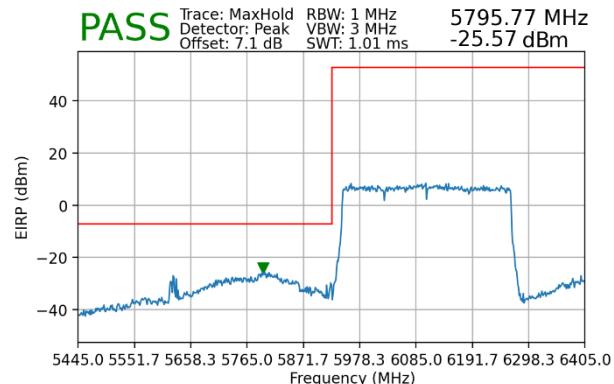
FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)		Approved by: Technical Manager
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7.2.3 MIMO Band Edge Measurements (320MHz BW)

Worst Case Mode: 802.11ax
 Worst Case Transfer Rate: MCS0
 Distance of Measurements: 3 Meters
 Operating Frequency: 5935MHz
 Channel: 2



Plot 7-12. Lower Band Edge Plot MIMO (Average – UNII Band 5)



Plot 7-13. Lower Band Edge Plot MIMO (Peak – UNII Band 5)

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7.3 Line Conducted Test Data

Test Overview and Limit

All AC line conducted spurious emissions are measured with a receiver connected to a grounded LISN while the EUT is operating at its maximum duty cycle, at maximum power, and at the appropriate frequencies. All data rates and modes were investigated for conducted spurious emissions. Only the conducted emissions of the configuration that produced the worst-case emissions are reported in this section.

All conducted emissions must not exceed the limits shown in the table below, per Section 15.207.

Frequency of emission (MHz)	Conducted Limit (dB μ V)	
	Quasi-peak	Average
0.15 – 0.5	66 to 56*	56 to 46*
0.5 – 5	56	46
5 – 30	60	50

Table 7-6. Conducted Limits

*Decreases with the logarithm of the frequency.

Test Procedures Used

ANSI C63.10-2013, Section 6.2

Test Settings

Quasi-Peak Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the spurious emission of interest.
2. RBW = 9kHz (for emissions from 150kHz – 30MHz)
3. Detector = quasi-peak
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize.

Average Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the spurious emission of interest.
2. RBW = 9kHz (for emissions from 150kHz – 30MHz)
3. Detector = RMS
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize.

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Test Setup

The EUT and measurement equipment were set up as shown in the diagram below.

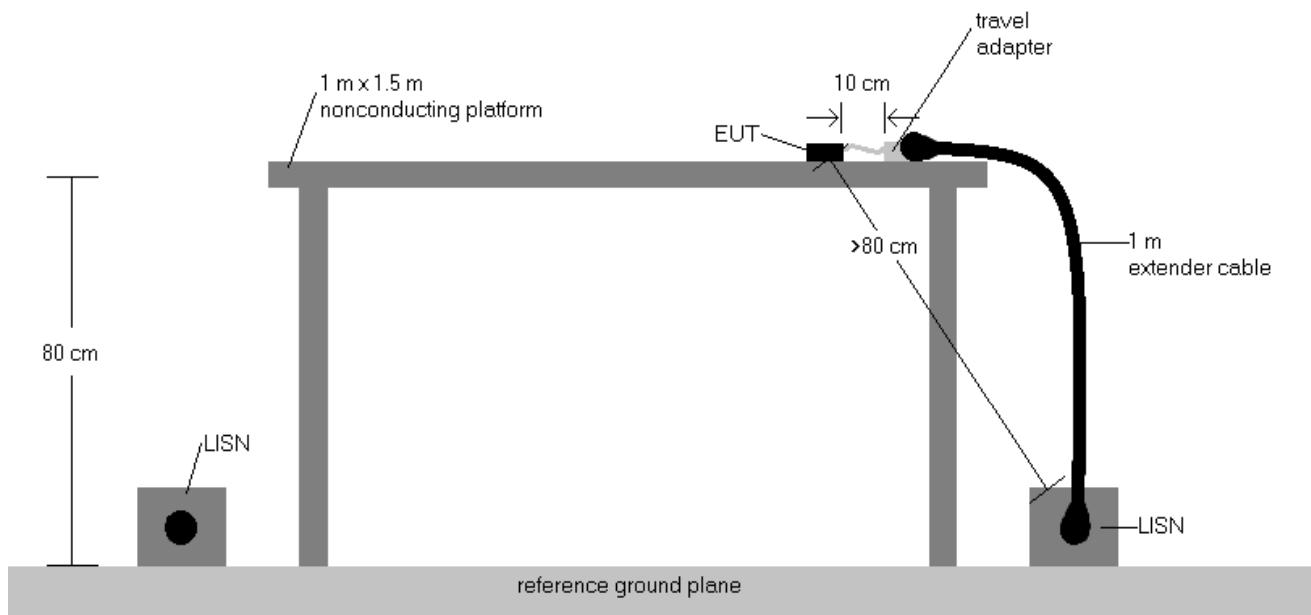
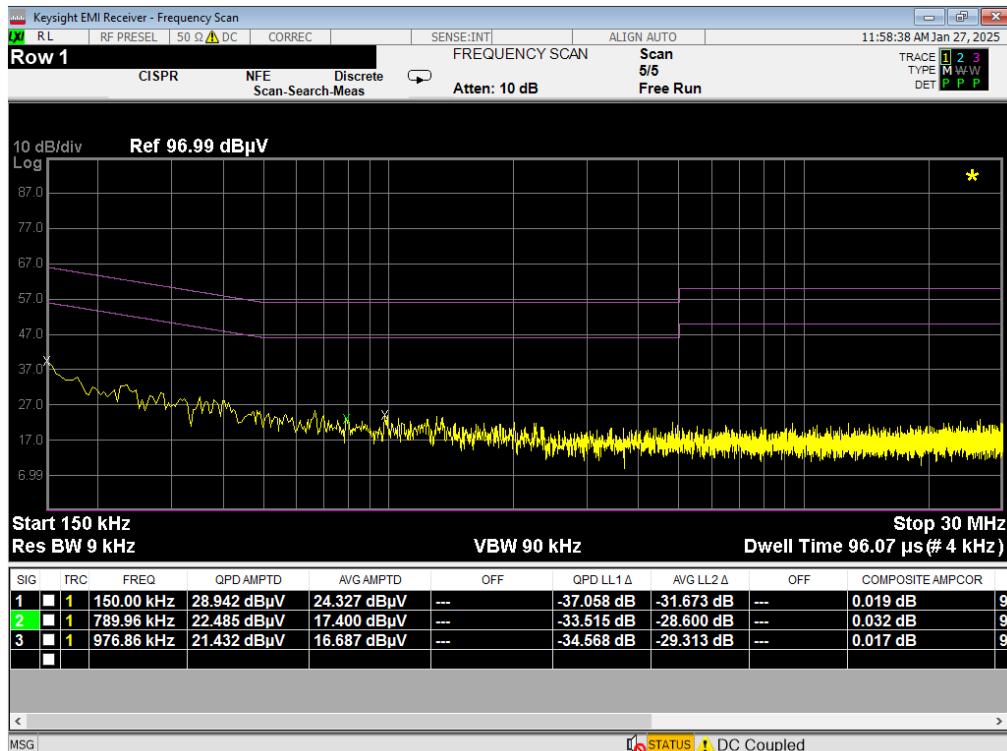


Figure 7-5. Test Instrument & Measurement Setup

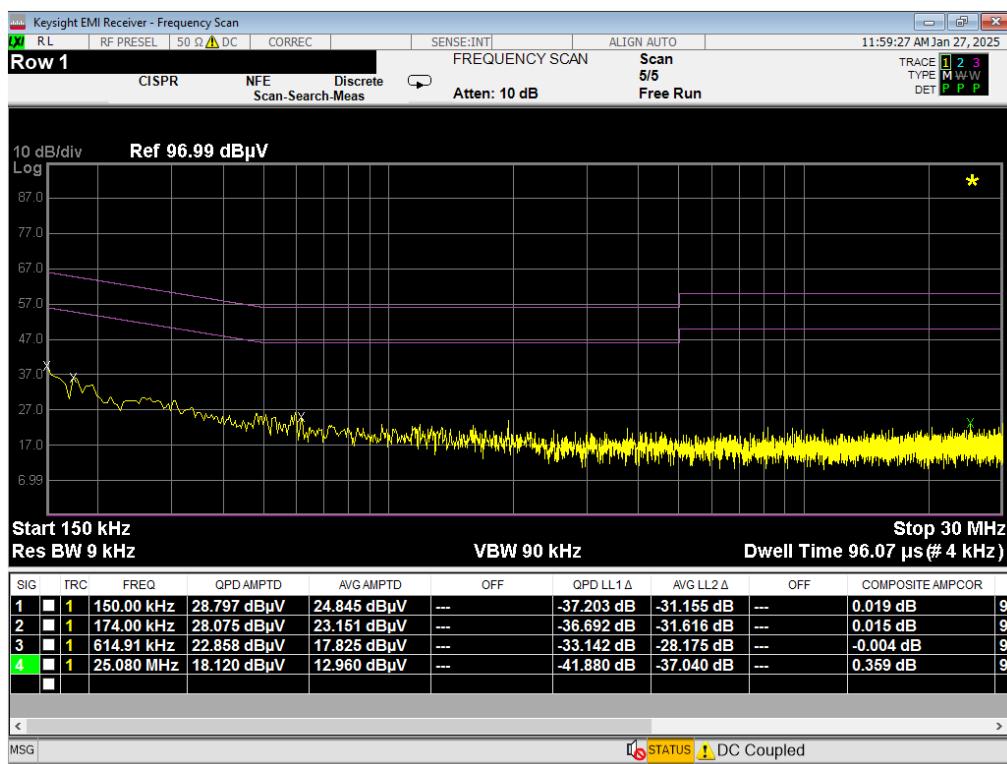
Test Notes

1. All modes of operation were investigated, and the worst-case emissions are reported using mid channel. The emissions found were not affected by the choice of channel used during testing.
2. The limit for an intentional radiator from 150kHz to 30MHz is specified in 15.207.
3. Corr. (dB) = Cable loss (dB) + LISN insertion factor (dB)
4. QP/AV Level (dB μ V) = QP/AV Analyzer/Receiver Level (dB μ V) + Corr. (dB)
5. Margin (dB) = QP/AV Limit (dB μ V) - QP/AV Level (dB μ V)
6. Traces shown in plot are made using a peak detector.
7. Deviations to the Specifications: None.

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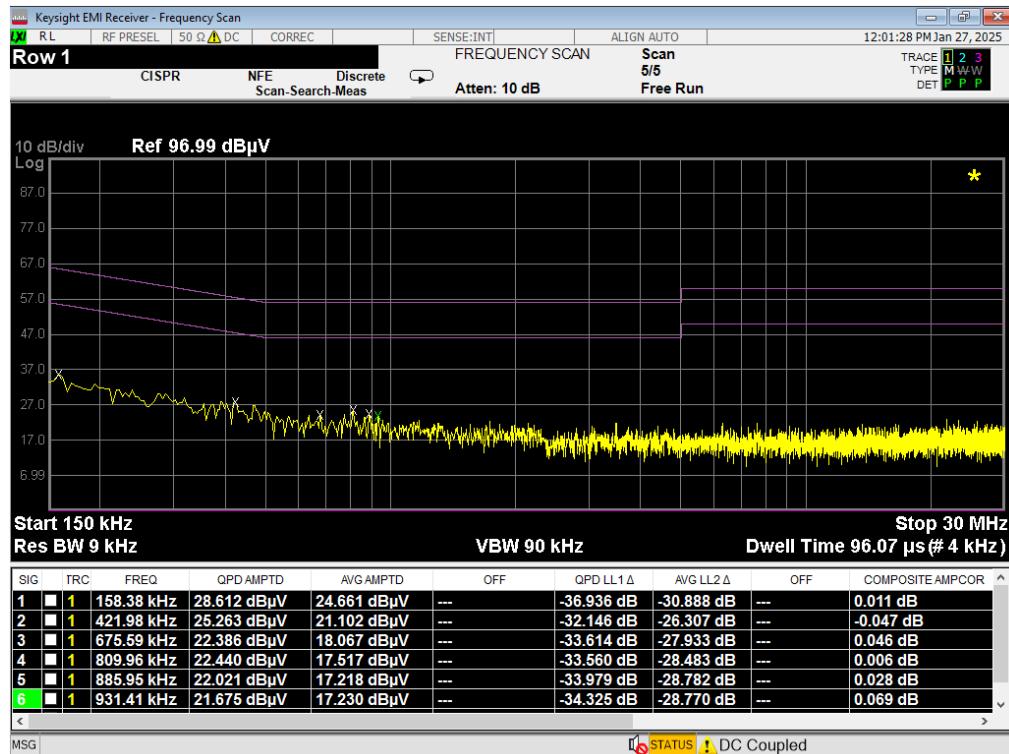


Plot 7-14. Line Conducted Plot with 802.11a UNII Band 5 – Ch.45 (L1)

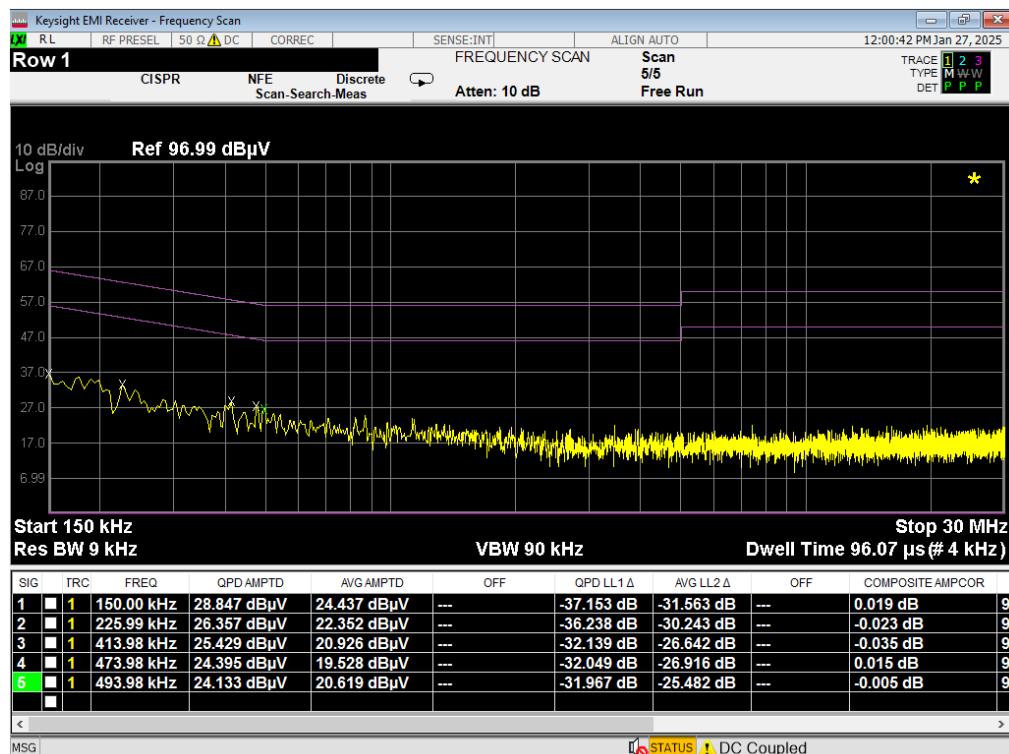


Plot 7-15. Line Conducted Plot with 802.11a UNII Band 5 – Ch.45 (N)

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)			Approved by: Technical Manager
Test Report S/N: 1M2503050023-11-R1.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Limited Modular Approval	Page 28 of 32	

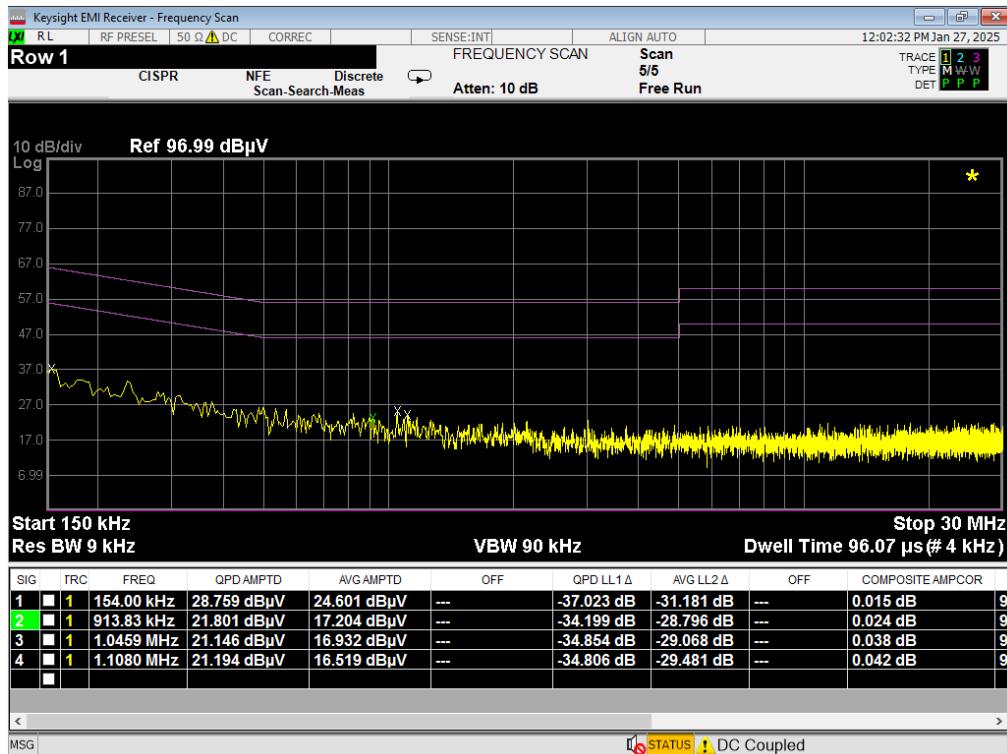


Plot 7-16. Line Conducted Plot with 802.11a UNII Band 6 – Ch.105 (L1)

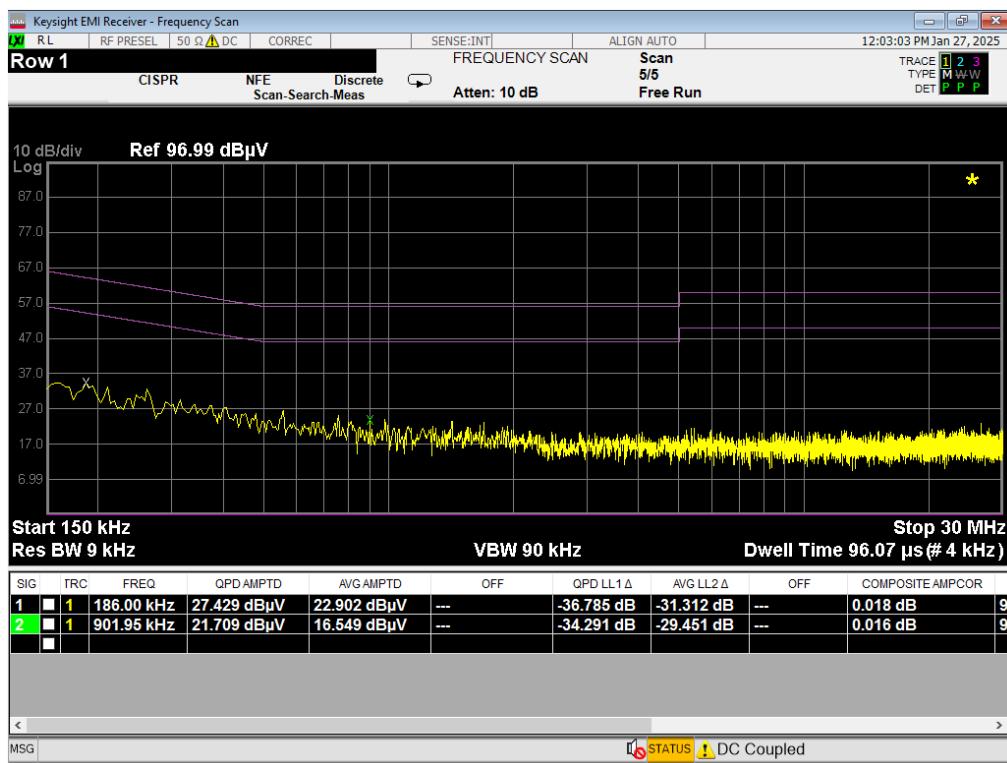


Plot 7-17. Line Conducted Plot with 802.11a UNII Band 6 – Ch.105 (N)

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)			Approved by: Technical Manager
Test Report S/N: 1M2503050023-11-R1.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Limited Modular Approval	Page 29 of 32	

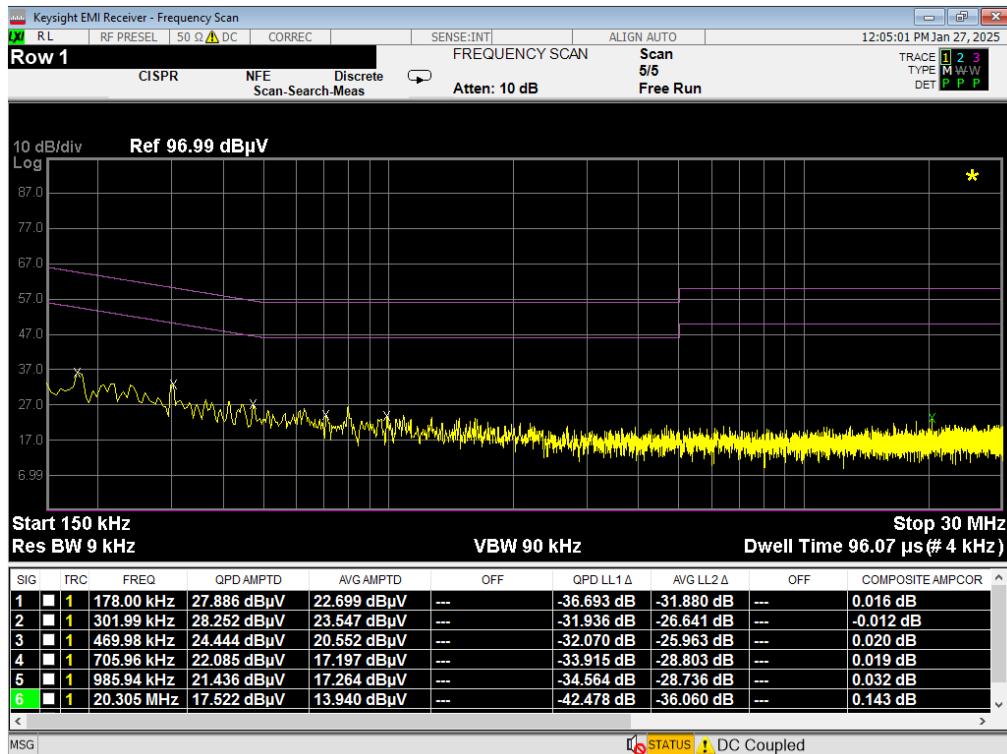


Plot 7-18. Line Conducted Plot with 802.11a UNII Band 7 – Ch.149 (L1)

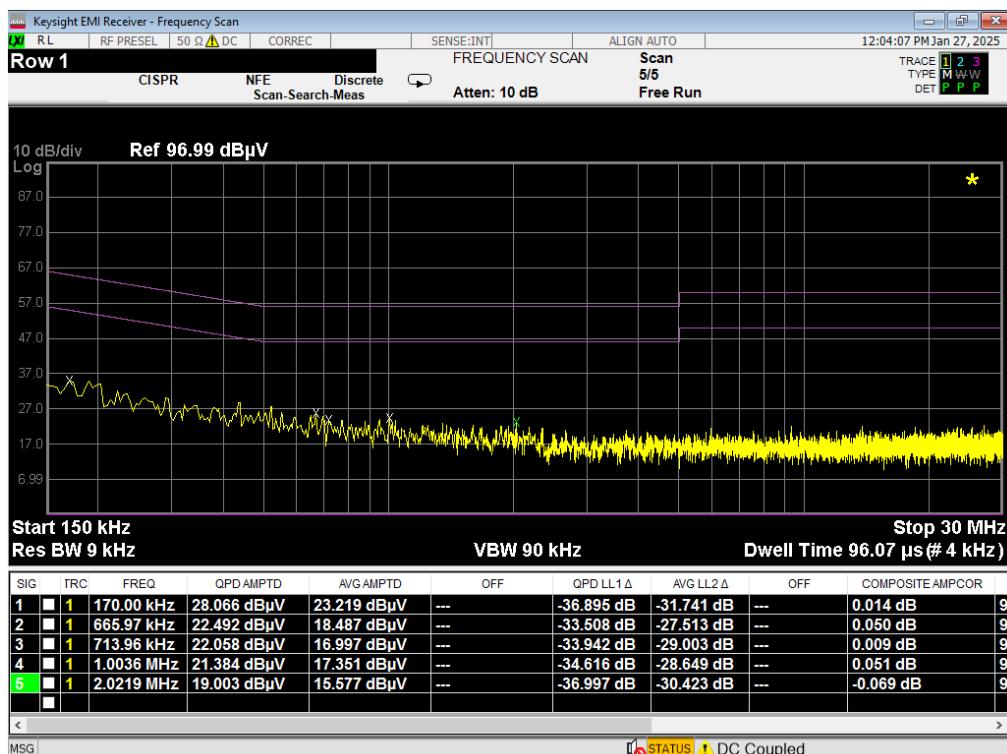


Plot 7-19. Line Conducted Plot with 802.11a UNII Band 7 – Ch.149 (N)

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)			Approved by: Technical Manager
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Plot 7-20. Line Conducted Plot with 802.11a UNII Band 8 – Ch.209 (L1)



Plot 7-21. Line Conducted Plot with 802.11a UNII Band 8 – Ch.209 (N)

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)			Approved by: Technical Manager
Test Report S/N: 1M2503050023-11-R1.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Limited Modular Approval	Page 31 of 32	

8.0 CONCLUSION

The data collected relate only the item(s) tested and show that the **Microsoft Portable Computing Device Model 2109 containing module FCC ID: C3K00002101** is in compliance with FCC Part Subpart E (15.407) of the FCC rules for operation as a client device.

FCC ID: C3K00002101	MEASUREMENT REPORT (Class II Permissive Change)		Approved by: Technical Manager
Test Report S/N: 1M2503050023-11-R1.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Limited Modular Approval	Page 32 of 32