





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

For

**Cisco Systems, Inc.**

125 West Tasman Drive,  
San Jose, CA 95134 USA

**FCC ID: LDKVCVER1937**  
**IC: 2461N-VCVER1937**

<b>Report Type:</b> Class II Permissive Change	<b>Product type:</b> Cisco Catalyst 9120AX Series Access Point
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<b>Report Number:</b> R2106223-247	
<b>Report Date:</b> 2021-08-20	
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\* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "\*\*\*"

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**DOCUMENT REVISION HISTORY**

<b>Revision Number</b>	<b>Report Number</b>	<b>Description of Revision</b>	<b>Date of Revision</b>
0	R2106223-247	Original Report	2021-08-20

## 1 General Description

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

This test report was prepared on behalf of *Cisco Systems, Inc.*, and their product model: *C9120AXI-A (Canada), C9120AXI-B (US), FCC ID: LDKVCVER1937, IC: 2461N-VCVER1937, or the "EUT"* as referred to in this report. The product is a Wireless Access Point with 2.4 GHz Wi-Fi, 5 GHz Wi-Fi, and BLE functionalities.

### 1.2 Mechanical Description of EUT

Length (cm)	Width (cm)	Height (cm)	Weight (kg)	S/N
20.5	20.5	4.0	0.95	FOC2517056S

### 1.3 Objective

This report was prepared on behalf of *Cisco Systems Inc.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission's rules and ISED RSS-247 Issue 2 on February 2017.

The objective was to determine continuous compliance with FCC Part 15.247 and ISED RSS-247 rules for AC Line Conducted Emissions and Radiated Spurious Emissions.

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

Equipment Class: NII, FCC ID: LDKVCVER1937, IC: 2461N-VCVER1937

### 1.5 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 v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

## 1.6 Measurement Uncertainty

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

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

## 1.7 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.

## 1.8 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):
  - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
  - o ENERGY STAR Recognized Test Laboratory – US EPA
  - o Telecommunications Certification Body (TCB) – US FCC;
  - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

## 2 System Test Configuration

### 2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v04.

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

To test the EUT cabinet radiation, the radio was configured to transmit its highest output power possible, which represents the worst case.

### 2.2 EUT Exercise Software

The software used was Tera Term and test commands, provided by *Cisco Systems Inc.*, the software is compliant with the standard requirements being tested against.

The EUT image version:

svn base: b22cae05ec30b4a758eb0171b9c2cb24f4cb3167  
commit: b22cae05ec30b4a758eb0171b9c2cb24f4cb3167  
tree 713c406cb897cc942f3f3d41b9ade640092cfba7

Radio	Modulation	Frequency (MHz)	Power Setting
2.4 GHz Wi-Fi	802.11b	2412	17
2.4 GHz AUX	802.11g	2412	17
BLE	GFSK	2402	default

Data Rates Tested:

802.11b mode: 1Mbps

802.11g mode: 6Mbps

BLE: default



## 2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v04 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).

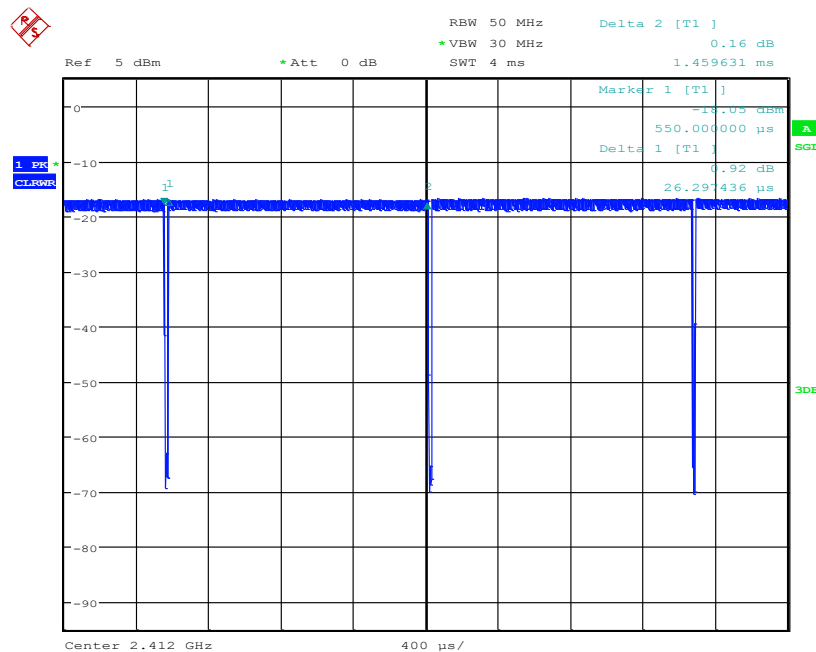
Radio Mode	Total On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
802.11b	1.43333	1.45963	98.20	0
802.11g AUX	0.292949	0.31217	93.84	0.276
BLE	1	1	100	0

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.

### 2.4 GHz Wi-Fi (802.11b)



Date: 10.AUG.2021 16:19:52

Ref 15 dBm \* Att 10 dB RBW 50 MHz Delta 2 [T1] -3.55 dB  
 \* VBW 30 MHz 312.179487  $\mu$ s  
 SWT 1 ms

Marker 1 [T1] -19.37 dBm  
 Delta 1 [T1] 162.943590  $\mu$ s  
 Delta 2 [T1] -1.78 dB  
 Delta 3 [T1] 19.230769  $\mu$ s

Center 2.412 GHz 100  $\mu$ s/

BLE



## 2.4 Equipment Modifications

No equipment modifications are made to the EUT

## 2.5 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6410	3CKRAQ1

## 2.6 Remote Support Equipment

Manufacturer	Description	Model
Cisco	PoE	SB-PWR-INJ2

## 2.7 Interface Ports and Cabling

Cable Description	Length	To	From
RS232 Male to Ethernet Cable	2 m	RS232 Female to USB Cable	EUT
RS232 Female to USB Cable	2 m	Laptop	RS232 Male to Ethernet Cable
Category 6 Ethernet Cable	2 m	EUT	PoE Injector

### 3 Summary of Test Results

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Results reported relate only to the product tested.

FCC and ISED Rules	Description of Test	Results
FCC §15.207 ISED RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247 (d) ISED RSS-247 §5.5 ISED RSS-Gen §8.9 and §8.10	Radiated Spurious Emissions	Compliant

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

### 4.1 Applicable Standards

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

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50  $\mu$ 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*

### 4.2 Test Setup

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

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

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

### 4.3 Test Procedure

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

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

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

#### 4.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

For example, a corrected amplitude of 40.3 dBuV = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB)

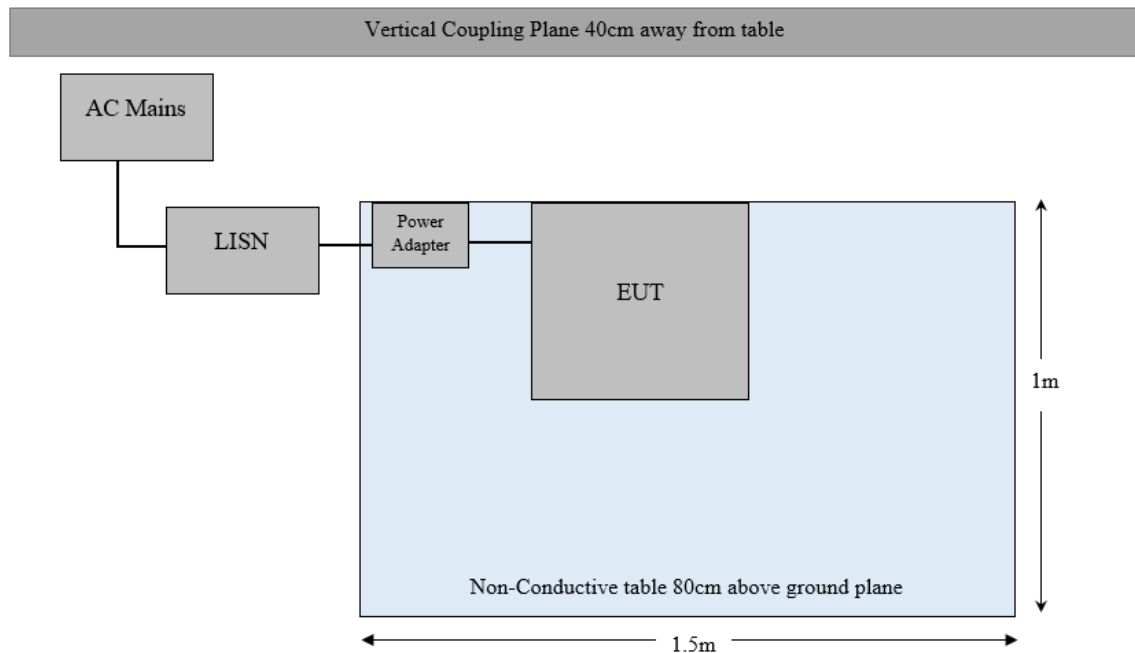
The Correction Factor is calculated by adding the Cable Loss (CL) and the Attenuator Factor (Atten) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = \text{CL} + \text{Atten}$$

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

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

#### 4.5 Test Setup Block Diagram



#### 4.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2020-03-17	1.5 years
Rohde & Schwarz	Impulse Limiter	ESH3-Z2	101963	2021-07-07	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150203	2021-03-02	1 year
Fairview Microwave	Micro-Coax Cable	FMC0101223-240	1907181	2020-08-25	1 year
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2020-10-12	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R
California Instruments	AC Power Source	5001ix-208	57079	Calibration not Required	Calibration not Required

**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 A2LA Policy P102 "A2LA Policy on Metrological Traceability".

#### 4.7 Test Environmental Conditions

Temperature:	24 °C
Relative Humidity:	38 %
ATM Pressure:	101.6 kPa

The testing was performed by Giriraj Gurjar on 2021-08-03 on ground plane test site.

#### 4.8 Summary of Test Results

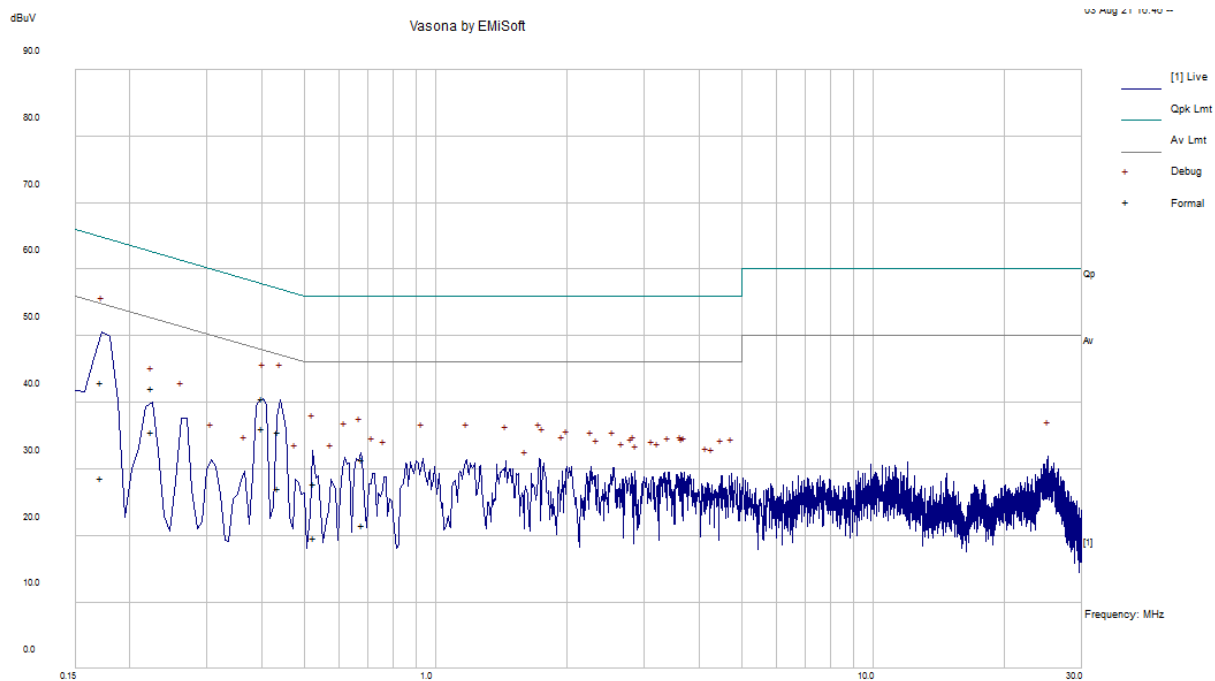
According to the recorded data in following table, the EUT complied with the FCC 15C and ISEDC RSS-Gen standard's conducted emissions limits, with the margin reading of:

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-11.74	0.401997	Line	0.15-30

## 4.9 Conducted Emissions Test Plots and Data

*EUT Configuration: 2.4 GHz Wi-Fi (4x4, 802.11b, 2412 MHz), 2.4 GHz AUX (802.11g, 2412 MHz), BLE (2402 MHz)*

### AC Line: 120V/60Hz



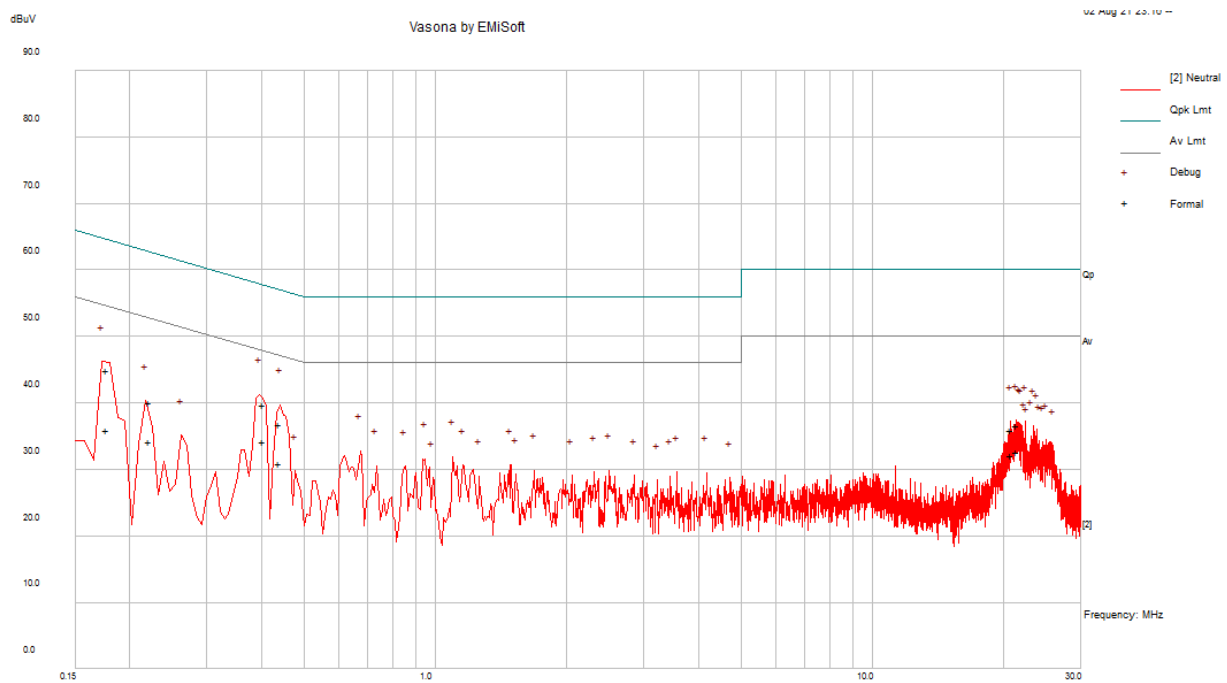
### Quasi-peak Measurement:

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.401997	30.16	10.41	40.57	Line	57.81	-17.24	QP
0.223581	31.59	10.64	42.23	Line	62.68	-20.45	QP
0.43751	25.27	10.38	35.65	Line	57.11	-21.46	QP
0.171254	32.32	10.72	43.04	Line	64.9	-21.86	QP
0.681033	21.18	10.23	31.41	Line	56	-24.59	QP
0.526833	17.48	10.3	27.78	Line	56	-28.22	QP

### Average Measurement:

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.401997	25.66	10.41	36.07	Line	47.81	-11.74	Ave.
0.223581	24.98	10.64	35.62	Line	52.68	-17.06	Ave.
0.43751	16.72	10.38	27.1	Line	47.11	-20.01	Ave.
0.681033	11.38	10.23	21.61	Line	46	-24.39	Ave.
0.171254	17.93	10.72	28.65	Line	54.9	-26.25	Ave.
0.526833	9.34	10.3	19.64	Line	46	-26.36	Ave.



**AC Line: 120V/60Hz****Quasi-Peak Measurement:**

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.404705	29.45	10.38	39.82	Neutral	57.76	-17.93	QP
0.177374	34.27	10.67	44.95	Neutral	64.61	-19.66	QP
0.440606	26.51	10.33	36.85	Neutral	57.05	-20.2	QP
0.221501	29.46	10.61	40.07	Neutral	62.76	-22.7	QP
21.32873	26.01	10.66	36.68	Neutral	60	-23.32	QP
20.69612	25.26	10.63	35.88	Neutral	60	-24.12	QP

**Average Measurement:**

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.404705	23.88	10.38	34.26	Neutral	47.76	-13.5	Ave.
0.440606	20.67	10.33	31.01	Neutral	47.05	-16.04	Ave.
21.32873	21.92	10.66	32.58	Neutral	50	-17.42	Ave.
20.69612	21.51	10.63	32.14	Neutral	50	-17.86	Ave.
0.221501	23.69	10.61	34.3	Neutral	52.76	-18.47	Ave.
0.177374	25.22	10.67	35.89	Neutral	54.61	-18.71	Ave.

## 5 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

### 5.1 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)).

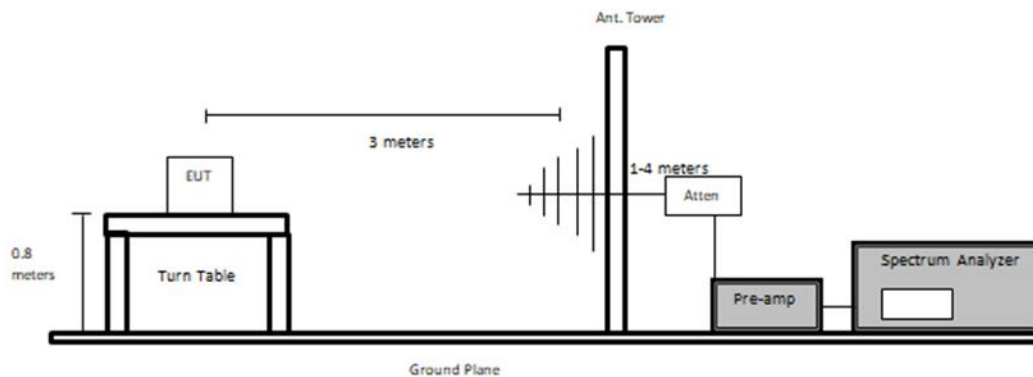
## 5.2 Test Setup

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.

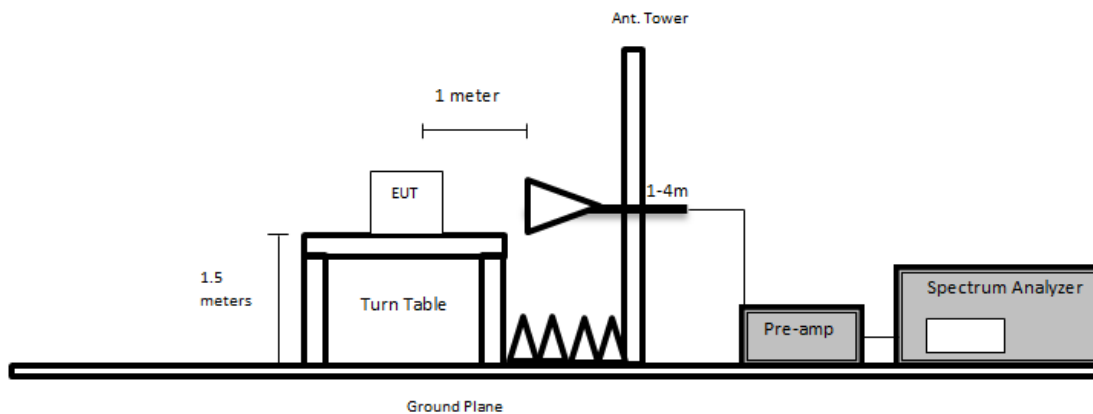
The spacing between the peripherals was 10 centimeters.

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

Below 1GHz:



Above 1GHz:



### 5.3 Test Procedure

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.

For radiated testing 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:  $\text{RBW} = 1\text{MHz} / \text{VBW} = 3\text{MHz} / \text{Sweep} = 100 \text{ ms}$
- (2) Average:  $\text{RBW} = 1\text{MHz} / \text{VBW} = 3\text{MHz} / \text{Sweep} = \text{Auto}$

### 5.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz and for above 1GHz scans.

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

$$\text{CA} = \text{S.A. Reading} + \text{Correction Factor}$$

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

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:

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

For emission above 1 GHz,

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

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

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

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

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

## 5.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2020-03-17	18 months
Agilent	Analyzer, Spectrum	E4446A	MY48250238	2021-02-12	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Antenna, Biconi-Log	JB3	A020106-2	2019-11-20	2 years
ETS Lindgren	Horn Antenna	3117	00218973	2019-02-13	2.5 years
Wisewave	Antenna, Horn	ARH-4223-02	10555-02	2021-04-12	2 years
Agilent	Amplifier, Pre	8447D	2443A04374	2020-08-17	1 year
HP	Pre-Amplifier	8449B	3008A01978	2021-05-05	1 year
AH Systems	Preamplifier	PAM 1840 VH	170	2020-11-09	1 year
IW Incorporated	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN- 3960-KPS	DC 1917	2021-03-03	1 year
Keysight Technologies	RF Limiter	11867A	MY42242932	2021-03-03	1 year
MDP Digital	Times Microwave LMR 400 UltraFex Coaxial Cable 35'	LMR400UF	BACL1904161	2021-06-18	1 year
-	SMA cable	-	C00011	Each time <sup>1</sup>	N/A
-	Band Reject Filter	-	-	Each time <sup>1</sup>	N/A
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

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 A2LA Policy P102 “A2LA Policy on Metrological Traceability”.

## 5.6 Test Environmental Conditions

<b>Temperature:</b>	20-24 °C
<b>Relative Humidity:</b>	28-45 %
<b>ATM Pressure:</b>	102.5 kPa

The testing was performed by Giriraj Gurjar from 2021-07-08 to 2021-07-12 in 5m chamber 3.

## 5.7 Summary of Test Results

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

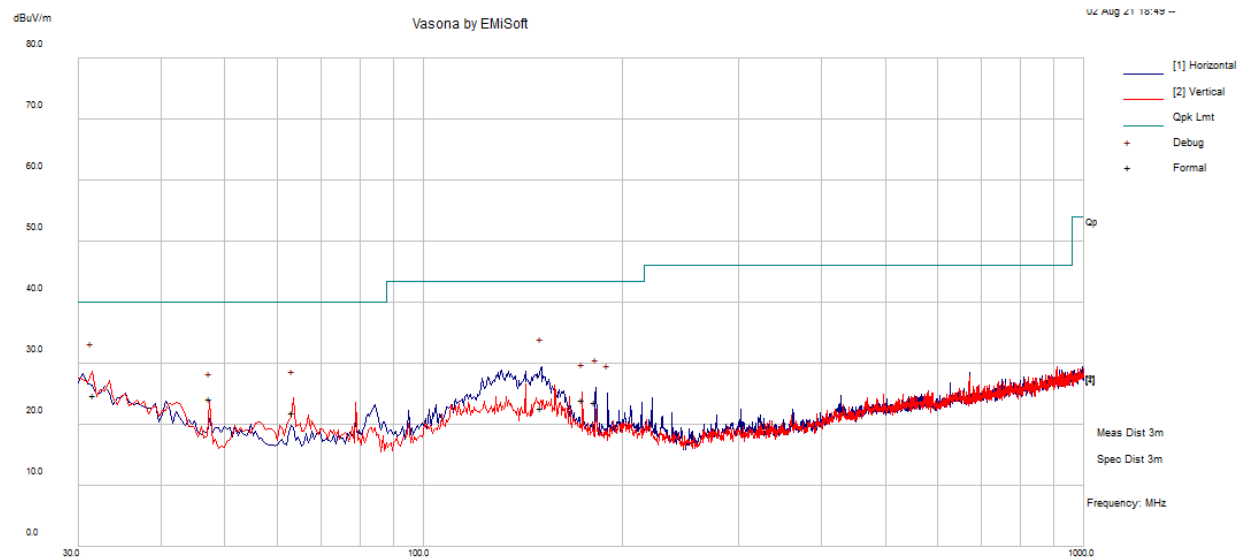
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, channel
-7.56	16821.12	Horizontal	802.11b, 2412 MHz

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

## 5.8 Spurious Emissions Test Results

### 1) 30 MHz – 1 GHz, Measured at 3 meters

*EUT Configuration: 2.4 GHz Wi-Fi (4x4, 802.11b, 2412 MHz), 2.4 GHz AUX (802.11g, 2412 MHz), BLE (2402 MHz)*



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
31.67775	23.69	1.15	24.84	122	V	141	40	-15.16	QP
47.50525	34.1	-9.84	24.26	105	V	300	40	-15.74	QP
63.34225	32.81	-10.81	22	147	V	100	40	-18	QP
174.18	30.73	-6.76	23.97	106	V	119	43.5	-19.53	QP
182.1233	30.59	-7.02	23.57	124	H	337	43.5	-19.93	QP
150.5923	28.44	-5.82	22.62	276	H	72	43.5	-20.88	QP

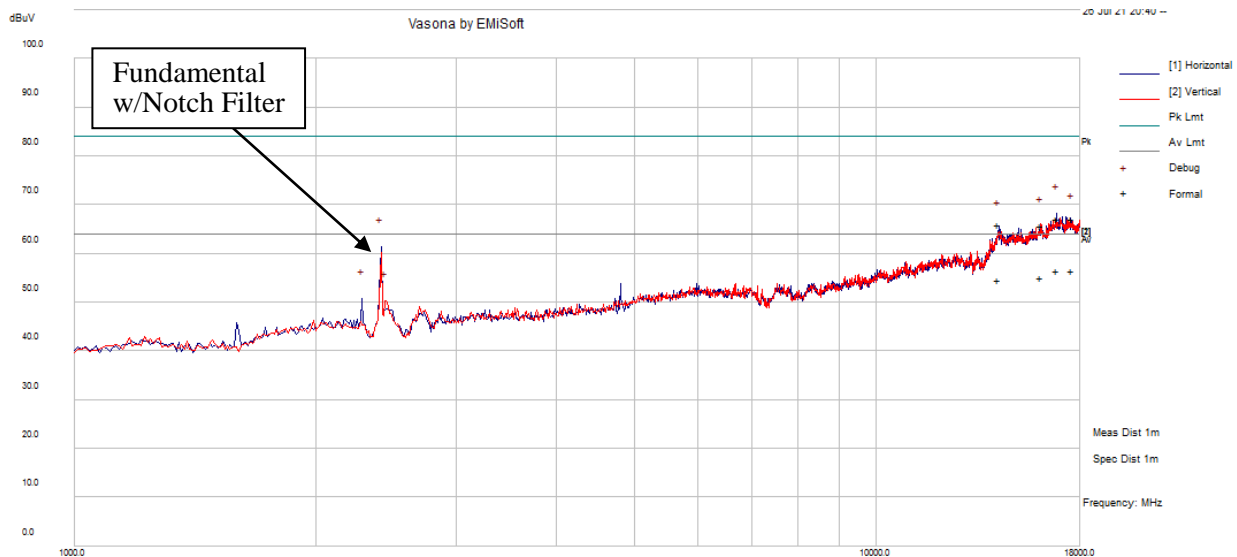
**2) 1 GHz-18 GHz, Measurement at 1 meter**

*EUT Configuration: 2.4 GHz Wi-Fi (4x4, 802.11b, 2412 MHz), 2.4 GHz AUX (802.11g, 2412 MHz), BLE (2402 MHz)*

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBμV/m)	FCC/ISED		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
2762	48.92	0	150	V	32.70	4.79	36.79	49.62	84	-34.38	PK
2762	37.05	0	150	V	32.70	4.79	36.79	37.75	64	-26.25	AVG
4806	46.89	0	150	H	35.00	6.46	35.70	52.65	84	-31.35	PK
4806	38.78	0	150	H	35.00	6.46	35.70	44.54	64	-19.46	AVG
4823	45.78	140	150	V	35.00	6.46	35.70	51.54	84	-32.46	PK
4823	33.84	140	150	V	35.00	6.46	35.70	39.60	64	-24.40	AVG
4816	47.24	0	150	H	35.00	6.46	35.70	53.00	84	-31.00	PK
4816	36.42	0	150	H	35.00	6.46	35.70	42.18	64	-21.82	AVG
7235	46.89	320	150	V	36.10	8.10	36.38	54.71	84	-29.29	PK
7235	34.87	320	150	V	36.10	8.10	36.38	42.69	64	-21.31	AVG
7241	46.48	200	150	H	36.10	8.10	36.38	54.30	84	-29.70	PK
7241	33.84	200	150	H	36.10	8.10	36.38	41.66	64	-22.34	AVG

### 3) 1 GHz-18 GHz, Vasona scan graph at 1 meter

*EUT Configuration: 2.4 GHz Wi-Fi (4x4, 802.11b, 2412 MHz), 2.4 GHz AUX (802.11g, 2412 MHz), BLE (2402 MHz)*

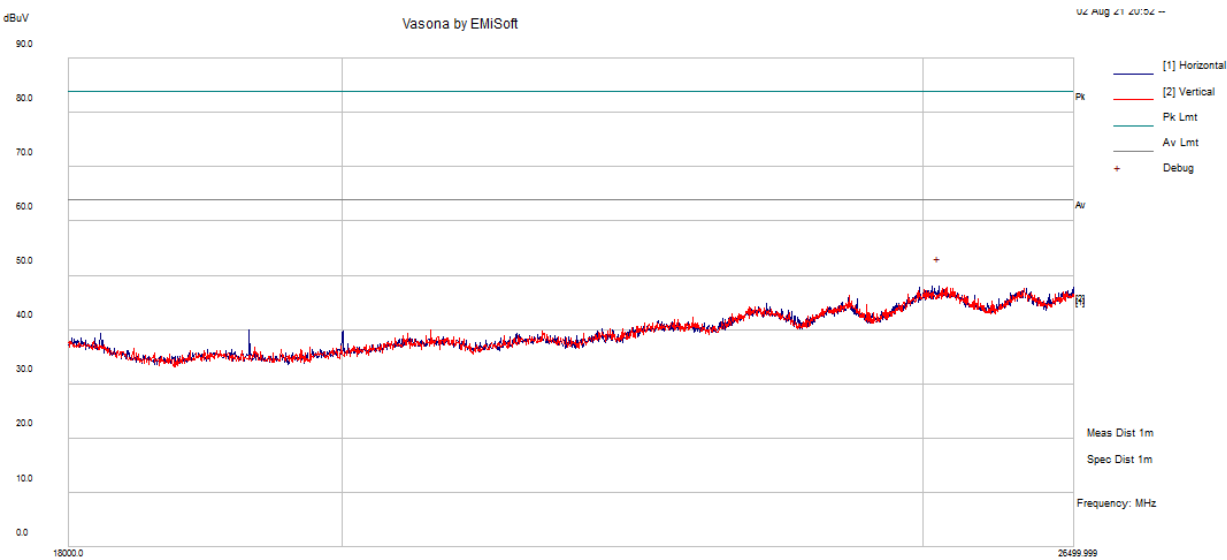


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
16821.12	43.01	24.17	67.18	134	H	188	84	-16.82	PK
17567.03	43.21	23.84	67.05	287	H	249	84	-16.95	PK
16090.94	43.33	22.36	65.69	266	H	74	84	-18.31	PK
14252.35	43.7	22.17	65.87	183	H	316	84	-18.13	PK
<b>16821.12</b>	<b>32.28</b>	<b>24.17</b>	<b>56.44</b>	<b>134</b>	<b>H</b>	<b>188</b>	<b>64</b>	<b>-7.56</b>	<b>Ave</b>
17567.03	32.54	23.84	56.38	287	H	249	64	-7.62	Ave
16090.94	32.72	22.36	55.08	266	H	74	64	-8.92	Ave
14252.35	32.52	22.17	54.69	183	H	316	64	-9.31	Ave



4) 18 GHz-26.5 GHz, Vasona scan graph at 1 meter

EUT Configuration: 2.4 GHz Wi-Fi (4x4, 802.11b, 2412 MHz), 2.4 GHz AUX (802.11g, 2412 MHz), BLE (2402 MHz)



## **6 Annex A – Test Setup Photographs**

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Please refer to the attachment

**7 Annex B (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 ---**