



FCC PART 15, SUBPART C TEST REPORT

For

Roku, Inc.

150 Winchester Cir,
Los Gatos, CA 95032, USA

FCC ID: TC2-R1032

Report Type:	Model:
Original Report	100002420
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* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "*" (Rev.12)

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1906283-247	Original Report	2019-08-21

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Roku, Inc.*, Model: 100002420, FCC ID: TC2-R1032.

1.2 Objective

This report is 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 is 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.

1.3 Related Submittal(s)/Grant(s)

FCC Part 15, Subpart E, Equipment NII with FCC ID: TC2-R1032

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 v05r2: 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	±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 %

1.6 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, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), 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 3279.03) 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 3279.01) 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 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 PSD 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
802.11b	2412	47
	2437	48
	2462	48
802.11g	2412	47
	2437	61
	2462	43
802.11n20	2412	38
	2437	60
	2462	42

Data Rates Tested:

802.11b mode: 1Mbps

802.11g mode: 6Mbps

802.11n HT20 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).

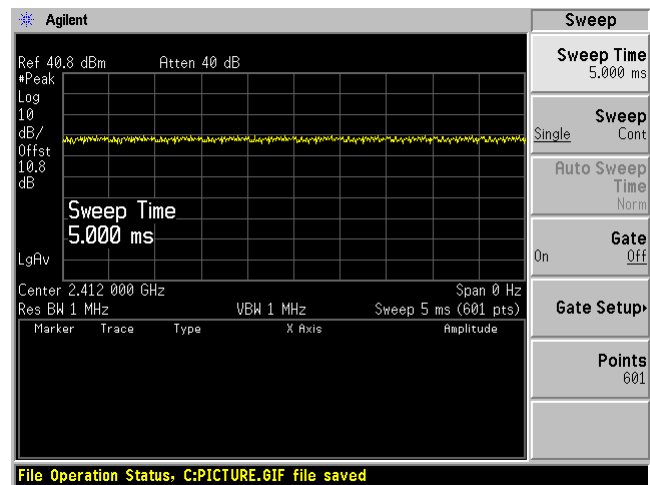
Radio Mode	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
802.11b	0.762	0.748	98.16	0.08
802.11g	-	-	100	0
802.11n20	-	-	100	0

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

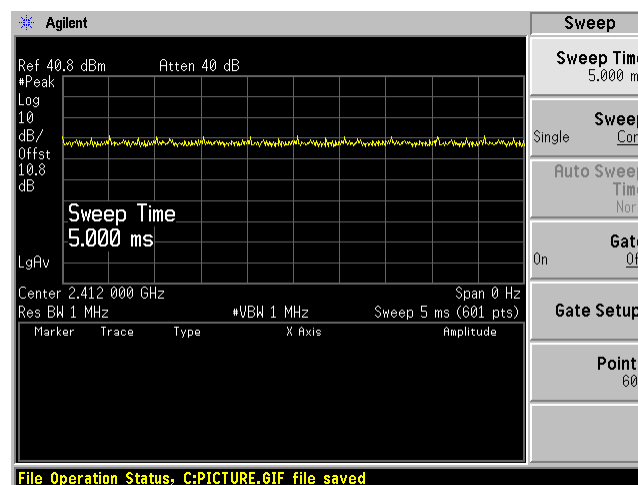
Duty Cycle Correction Factor (dB) = $10 \cdot \log(1/\text{Duty Cycle})$

Please refer to the following plots.

802.11g mode



802.11n20 mode



2.4 Local Support Equipment

Manufacturer	Description	Model
Dell	Laptop	Latitude E7450

2.5 Support Equipment

Manufacturer	Description	Model
Roku	Debug Board	Unknown

2.6 Interface Ports and Cabling

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

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)
2.4GHz Wi-Fi	2400-2480	4
5GHz Wi-Fi	5180-5240,5745-5825	4

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.

Limits for General Population/Uncontrolled Exposure

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

f = frequency in MHz

* = Plane-wave equivalent power density

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

2.4GHz Wifi

Maximum output power at antenna input terminal (dBm):	17.47
Maximum output power at antenna input terminal (tune-up) (mW):	18.47
Maximum output power at antenna input terminal (tune-up) (mW):	70.31
Prediction distance (cm):	20
Prediction frequency (MHz):	2412
Maximum Antenna Gain, typical (dBi):	4
Maximum Antenna Gain (numeric):	2.51
Power density of prediction frequency at 20.0 cm (mW/cm ²):	0.0351
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm ²):	1.0

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.04mW/cm². Limit is 1.0 mW/cm².

6 FCC §15.207 - AC Line Conducted Emissions

6.1 Applicable Standards

As per FCC §15.207 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 μ 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 ^{Note1}	56 to 46 ^{Note2}
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 were 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 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".

6.4 Corrected Amplitude and Margin Calculation

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

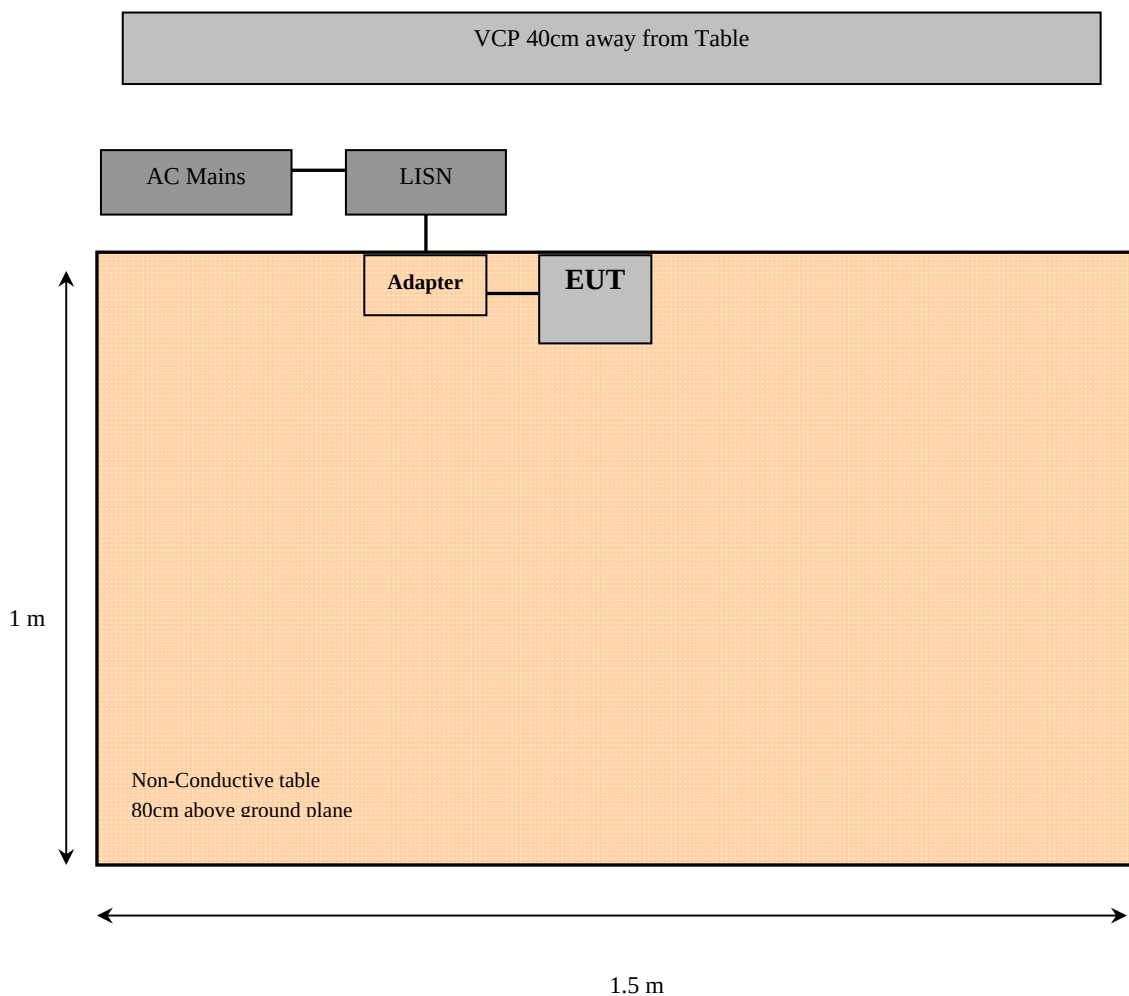
$$CA = A_i + CL + \text{Atten}$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 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:

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

6.5 Test Setup Block Diagram



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	2018-07-05	2 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101964	2019-07-31	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150204	2019-02-25	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2019-04-11	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

6.7 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	101.31 kPa

The testing was performed by Corey Phan on 2019-08-09 in 5 chamber 3.

6.8 Summary of Test Results

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

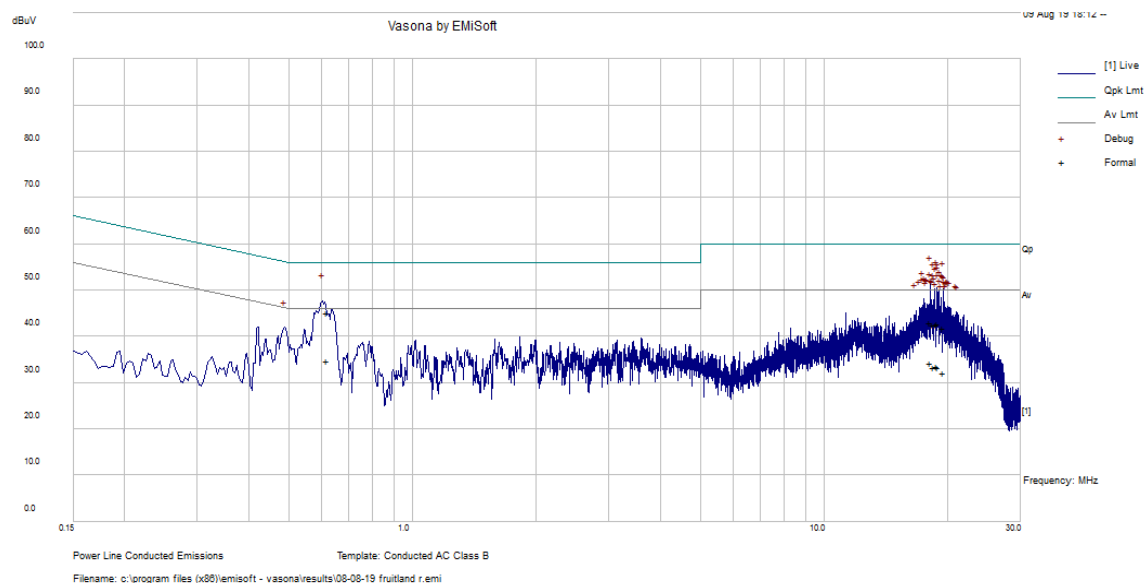
2.4 GHz Wi-Fi

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-10.76	0.612947	Neutral	0.15-30

6.9 Conducted Emissions Test Plots and Data

2.4 GHz Wi-Fi

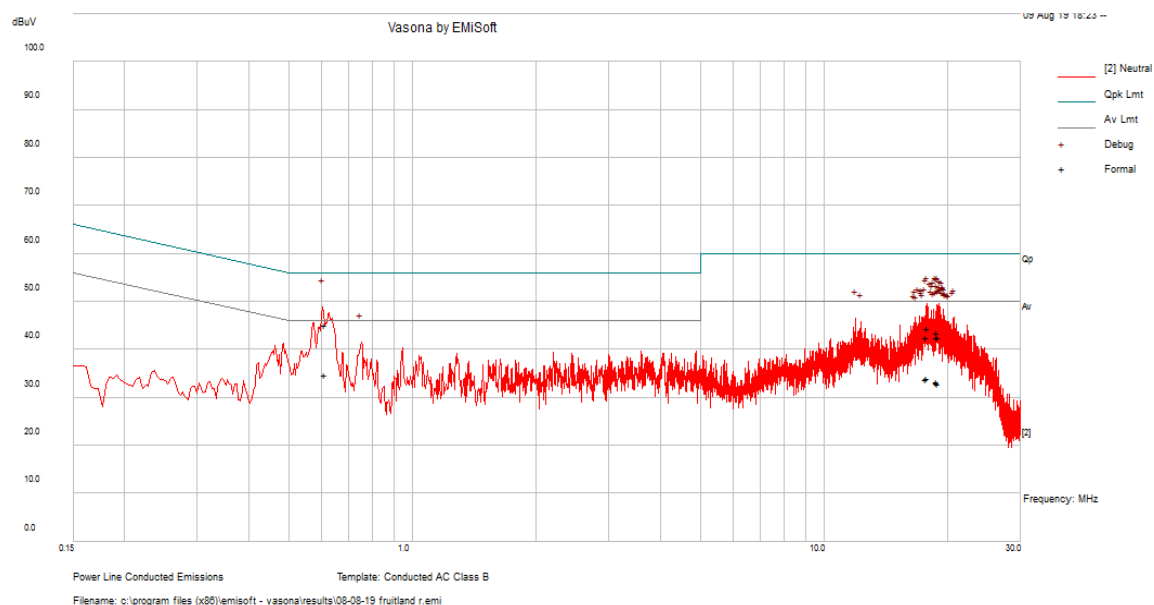
120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.620633	45.22	Line	56	-10.78	QP
18.115253	42.98	Line	60	-17.02	QP
18.807291	42.53	Line	60	-17.47	QP
19.492498	41.76	Line	60	-18.24	QP
18.501808	42.43	Line	60	-17.57	QP
18.934671	42.8	Line	60	-17.2	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.620633	34.73	Line	46	-11.27	Ave.
18.115253	34.25	Line	50	-15.75	Ave.
18.807291	33.47	Line	50	-16.53	Ave.
19.492498	32.2	Line	50	-17.8	Ave.
18.501808	33.44	Line	50	-16.56	Ave.
18.934671	33.27	Line	50	-16.73	Ave.

120 V, 60 Hz – Neutral



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.612947	45.24	Neutral	56	-10.76	QP
18.945651	42.5	Neutral	60	-17.5	QP
17.813405	44.47	Neutral	60	-15.53	QP
18.754639	42.53	Neutral	60	-17.47	QP
18.848177	43.38	Neutral	60	-16.62	QP
17.696708	42.64	Neutral	60	-17.36	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.612947	34.66	Neutral	46	-11.34	Ave.
18.945651	32.85	Neutral	50	-17.15	Ave.
17.813405	33.98	Neutral	50	-16.02	Ave.
18.754639	33.01	Neutral	50	-16.99	Ave.
18.848177	33.37	Neutral	50	-16.63	Ave.
17.696708	33.86	Neutral	50	-16.14	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) and RSS-Gen 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:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW = 10Hz or 1/T / Sweep = 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:

$$CA = Ai + AF + CL + Atten - Ga$$

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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950K03	100044	2018-10-26	2 years
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 years
EMCO	Antenna, Horn	3115	9511-4627	2018-03-28	2 years
Agilent	Amplifier, Pre	8447D	2443A04374	2018-08-13	1 year
Insulated Wire INC	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1501AN- 3960-KPS	DC 1807	2018-03-13	2 years
-	SMA cable	-	C0002	Each time ¹	N/A
HP/Agilent	Pre-Amplifier	8449B	3008A01978	2018-08-17	1 year
Wisewave	Antenna, Horn	ARH-4223-02	10555-01	2018-02-14	2 years
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2019-04-02	2 years
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.*

7.6 Test Environmental Conditions

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

The testing was performed by Christian McCaig and Corey Phan from 2019-08-06 to 2019-08-09 in 5m chamber 3.

7.7 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:

2.4 GHz Wi-Fi

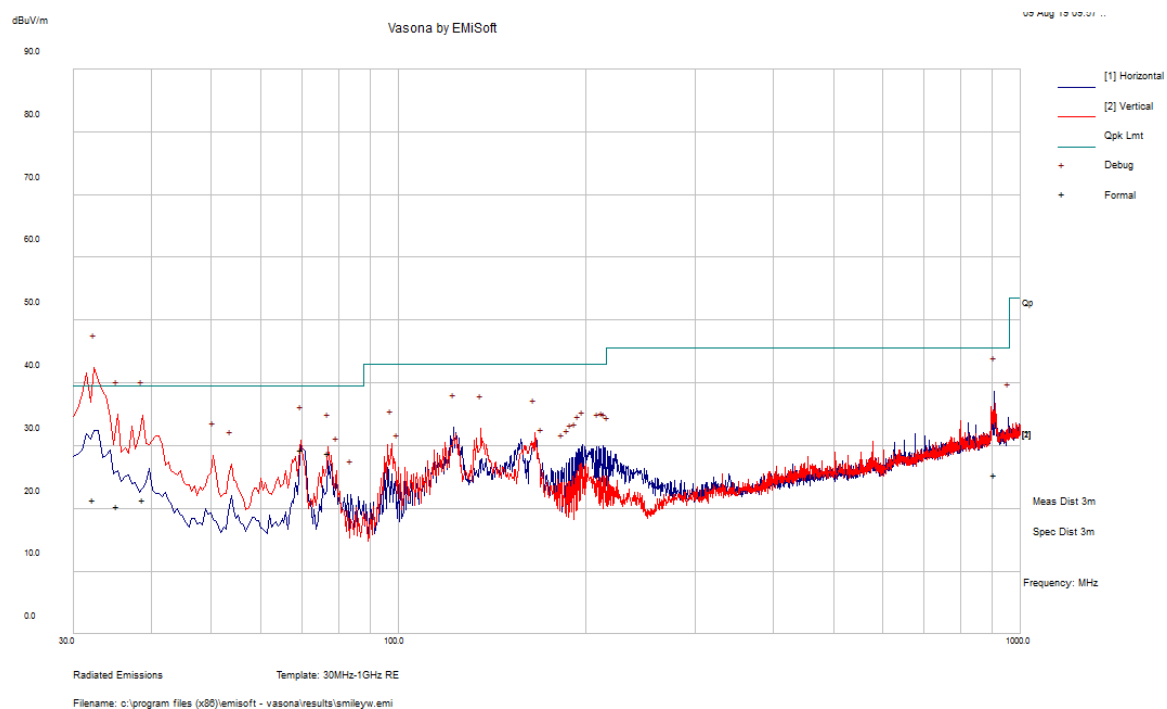
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, channel
-0.59	2483.5	Vertical	b mode, high channel

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

7.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

2.4 GHz Wi-Fi



Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
32.34225	21.35	228	V	267	39.5	-18.15	QP
35.326	20.39	119	V	175	39.5	-19.11	QP
38.8925	21.49	104	V	347	39.5	-18.01	QP
906.674	25.43	144	H	177	45.5	-20.07	QP
69.83825	29.39	232	V	7	39.5	-10.11	QP
77.08625	28.87	119	V	82	39.5	-10.63	QP

2) 1–25 GHz Measured at 3 meters

802.11b 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 2412 MHz											
2390	58.93	326	211	H	28.865	5.728	36.162	57.36	74	-16.64	PK
2390	50.96	326	211	H	28.865	5.728	36.162	49.39	54	-4.61	AV
2390	63.07	256	179	V	28.89	5.728	36.162	61.53	74	-12.47	PK
2390	54.07	256	179	V	28.89	5.728	36.162	52.53	54	-1.47	AV
4824	45.12	0	100	H	33.135	10.354	35.655	52.95	74	-21.05	PK
4824	30.96	0	100	H	33.135	10.354	35.655	38.79	54	-15.21	AV
4824	44.84	0	100	V	33.135	10.354	35.655	52.67	74	-21.33	PK
4824	30.96	0	100	V	33.135	10.354	35.655	38.79	54	-15.21	AV
7236	46.31	220	219	H	37.401	12.757	35.67	60.80	74	-13.20	PK
7236	35.51	220	219	H	37.401	12.757	35.67	50.00	54	-4.00	AV
7236	45.17	148	198	V	37.401	12.757	35.67	59.66	74	-14.34	PK
7236	31.61	148	198	V	37.401	12.757	35.67	46.10	54	-7.90	AV
Middle Channel 2437 MHz											
4874	44.65	147	218	H	33.389	10.341	35.655	52.73	74	-21.28	PK
4874	30.88	147	218	H	33.389	10.341	35.655	38.96	54	-15.05	AV
4874	45.23	280	215	V	33.389	10.341	35.655	53.31	74	-20.70	PK
4874	30.53	280	215	V	33.389	10.341	35.655	38.61	54	-15.40	AV
7311	46.53	213	222	H	37.523	12.757	35.67	61.14	74	-12.86	PK
7311	34.41	213	222	H	37.523	12.757	35.67	49.02	54	-4.98	AV
7311	45.16	181	192	V	37.523	12.757	35.67	59.77	74	-14.23	PK
7311	31.86	181	192	V	37.523	12.757	35.67	46.47	54	-7.53	AV
High Channel 2462 MHz											
2483.5	61.18	245	219	H	29.169	5.848	36.148	60.05	74	-13.95	PK
2483.5	53.81	245	219	H	29.169	5.848	36.148	52.68	54	-1.32	AV
2483.5	61.92	263	222	V	29.095	5.848	36.148	60.72	74	-13.29	PK
2483.5	54.62	263	222	V	29.095	5.848	36.148	53.42	54	-0.59	AV
4924	45.82	141	223	H	33.599	8.5161667	35.655	52.28	74	-21.72	PK
4924	31.56	141	223	H	33.599	8.5161667	35.655	38.02	54	-15.98	AV
4924	45.12	0	100	V	33.599	8.5161667	35.655	51.58	74	-22.42	PK
4924	30.97	0	100	V	33.599	8.5161667	35.655	37.43	54	-16.57	AV
7386	45.85	220	231	H	37.401	12.757	35.67	60.34	74	-13.66	PK
7386	33.46	220	231	H	37.401	12.757	35.67	47.95	54	-6.05	AV
7386	45.22	180	190	V	37.401	12.757	35.67	59.71	74	-14.29	PK
7386	32.03	180	190	V	37.401	12.757	35.67	46.52	54	-7.48	AV

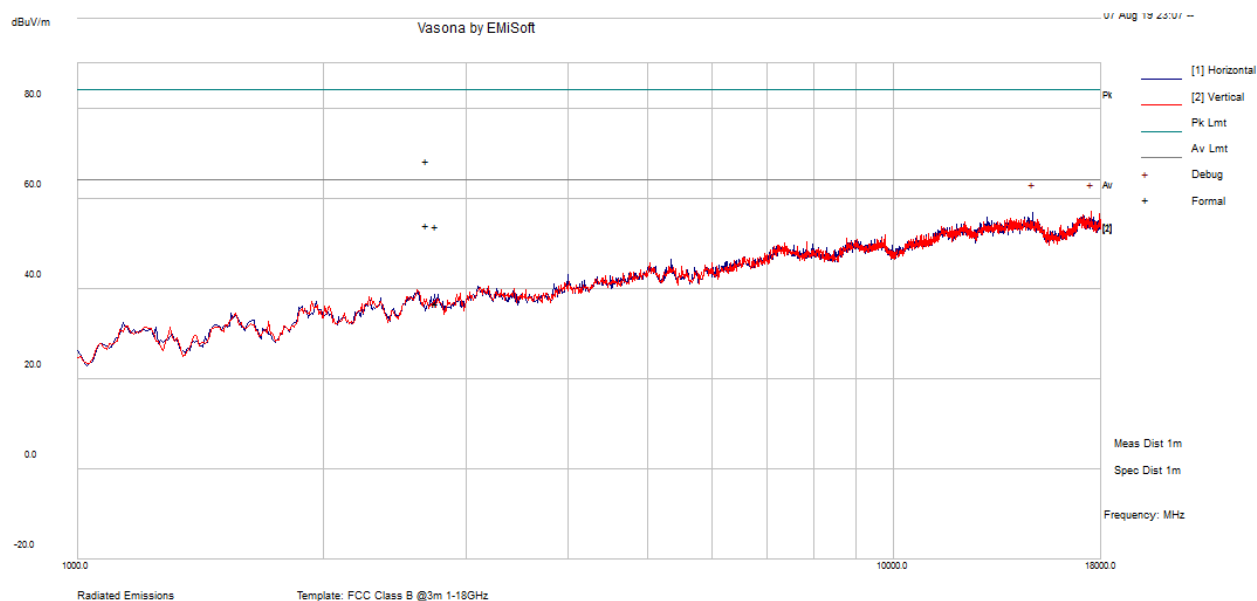
802.11g mode

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 2412 MHz											
2390	66.94	340	272	H	28.865	5.728	36.162	65.37	74	-8.63	PK
2390	47.44	340	272	H	28.865	5.728	36.162	45.87	54	-8.13	AV
2390	69.89	271	226	V	28.89	5.728	36.162	68.35	74	-5.65	PK
2390	51.35	271	226	V	28.89	5.728	36.162	49.81	54	-4.19	AV
4824	45.00	0	100	H	33.135	10.354	35.655	52.83	74	-21.17	PK
4824	32.60	0	100	H	33.135	10.354	35.655	40.43	54	-13.57	AV
4824	47.28	0	100	V	33.135	10.354	35.655	55.11	74	-18.89	PK
4824	32.51	0	100	V	33.135	10.354	35.655	40.34	54	-13.66	AV
Middle Channel 2437 MHz											
4874	45.14	0	100	H	33.389	10.341	35.655	53.22	74	-20.79	PK
4874	32.95	0	100	H	33.389	10.341	35.655	41.03	54	-12.98	AV
4874	44.77	0	100	V	33.389	10.341	35.655	52.85	74	-21.16	PK
4874	32.61	0	100	V	33.389	10.341	35.655	40.69	54	-13.32	AV
High Channel 2462 MHz											
2483.5	65.73	319	127	H	29.169	5.848	36.148	64.60	74	-9.40	PK
2483.5	51.73	319	127	H	29.169	5.848	36.148	50.60	54	-3.40	AV
2483.5	70.87	250	200	V	29.095	5.848	36.148	69.67	74	-4.34	PK
2483.5	53.90	250	200	V	29.095	5.848	36.148	52.70	54	-1.31	AV
4924	45.29	0	100	H	33.599	8.5161667	35.655	51.75	74	-22.25	PK
4924	33.03	0	100	H	33.599	8.5161667	35.655	39.49	54	-14.51	AV
4924	44.63	0	100	V	33.599	8.5161667	35.655	51.09	74	-22.91	PK
4924	32.88	0	100	V	33.599	8.5161667	35.655	39.34	54	-14.66	AV

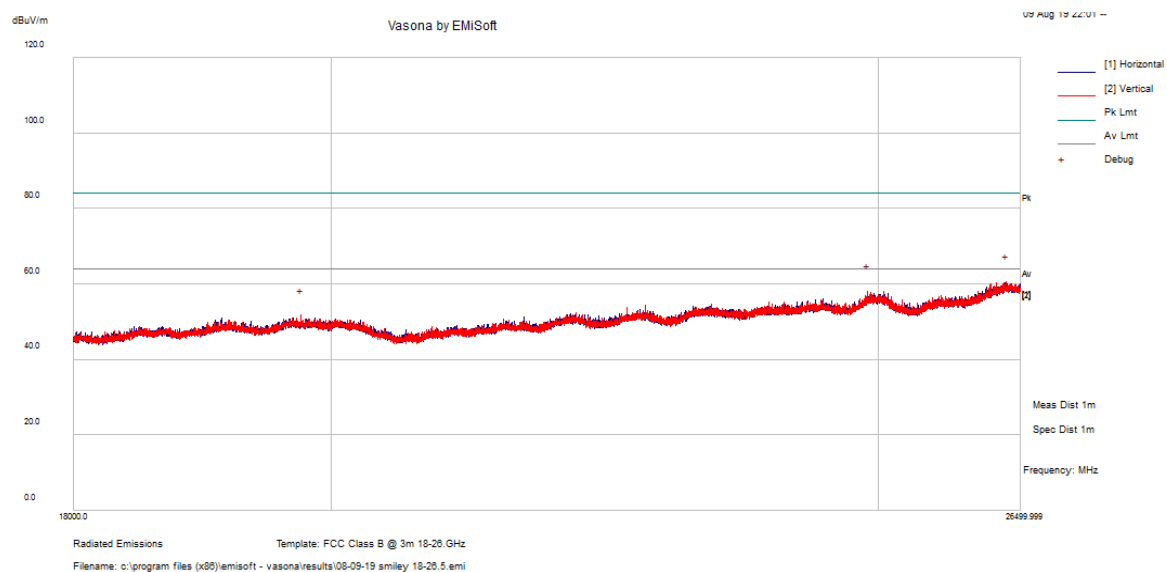
802.11n20 mode

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 2412 MHz											
2390	73.70	240	170	H	28.865	5.728	36.162	72.13	74	-1.87	PK
2390	54.47	240	170	H	28.865	5.728	36.162	52.90	54	-1.10	AV
2390	73.46	259	208	V	28.89	5.728	36.162	71.92	74	-2.08	PK
2390	53.72	259	208	V	28.89	5.728	36.162	52.18	54	-1.82	AV
4824	45.00	0	100	H	33.135	10.354	35.655	52.83	74	-21.17	PK
4824	33.38	0	100	H	33.135	10.354	35.655	41.21	54	-12.79	AV
4824	44.58	0	100	V	33.135	10.354	35.655	52.41	74	-21.59	PK
4824	33.20	0	100	V	33.135	10.354	35.655	41.03	54	-12.97	AV
Middle Channel 2437 MHz											
4874	44.51	0	100	H	33.389	10.341	35.655	52.59	74	-21.42	PK
4874	33.12	0	100	H	33.389	10.341	35.655	41.20	54	-12.81	AV
4874	44.46	0	100	V	33.389	10.341	35.655	52.54	74	-21.47	PK
4874	33.04	0	100	V	33.389	10.341	35.655	41.12	54	-12.89	AV
High Channel 2462 MHz											
2483.5	70.92	315	100	H	29.169	5.848	36.148	69.79	74	-4.21	PK
2483.5	53.20	315	100	H	29.169	5.848	36.148	52.07	54	-1.93	AV
2483.5	71.00	260	204	V	29.095	5.848	36.148	69.80	74	-4.21	PK
2483.5	53.44	260	204	V	29.095	5.848	36.148	52.24	54	-1.77	AV
4924	44.52	0	100	H	33.599	8.5161667	35.655	50.98	74	-23.02	PK
4924	33.81	0	100	H	33.599	8.5161667	35.655	40.27	54	-13.73	AV
4924	43.85	0	100	V	33.599	8.5161667	35.655	50.31	74	-23.69	PK
4924	32.63	0	100	V	33.599	8.5161667	35.655	39.09	54	-14.91	AV

1 GHz – 18 GHz Worst Case Scan



18 GHz – 26.5 GHz Worst Case Scan



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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

8.4 Test Environmental Conditions

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

The testing was performed by Christian McCaig on 2019-07-29 in RF site.

8.5 Test Results

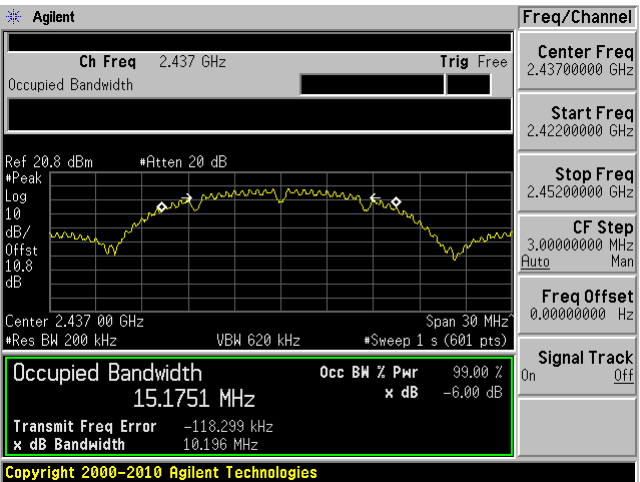
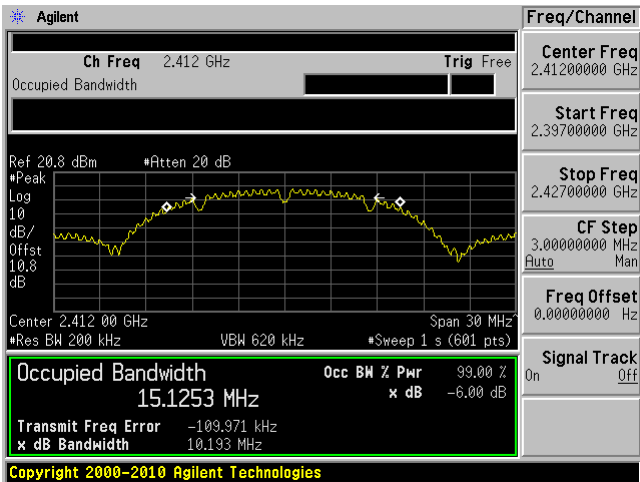
Channel	Frequency (MHz)	99% OBW (kHz)	6 dB BW (kHz)	6 dB OBW limit (kHz)
802.11b mode				
Low	2412	15125.3	10141	500
Middle	2437	15175.1	10147	500
High	2462	15185.6	10148	500
802.11g mode				
Low	2412	18046.5	16545	500
Middle	2437	17889.8	16548	500
High	2462	16570.5	16553	500
802.11n-20 mode				
Low	2412	17670.2	17689	500
Middle	2437	18397.0	17667	500
High	2462	17692.9	17668	500

Please refer to the following plots for detailed test results.

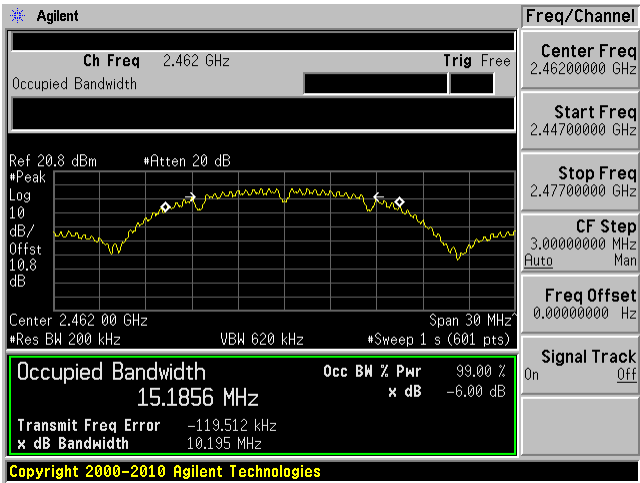
99% OBW
802.11b mode

Low Channel 2412 MHz

Middle Channel 2437 MHz



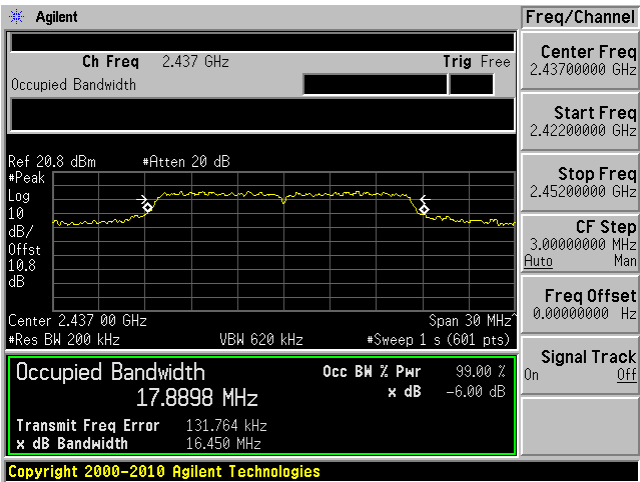
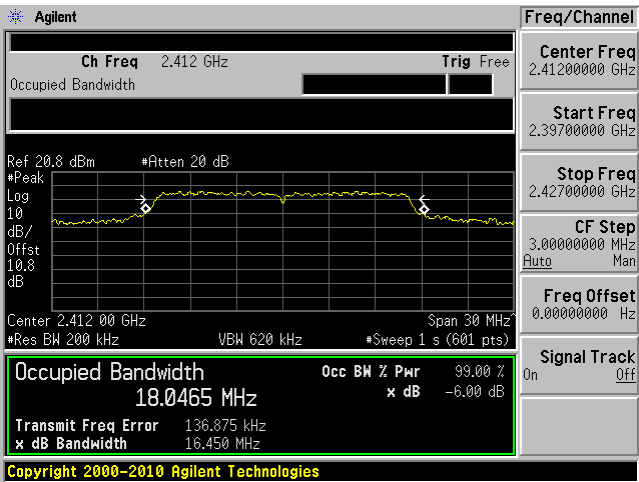
High Channel 2462 MHz



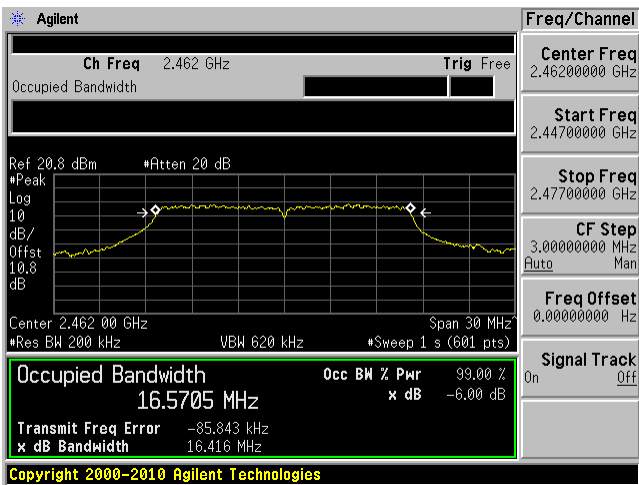
802.11g mode

Low Channel 2412 MHz

Middle Channel 2437 MHz

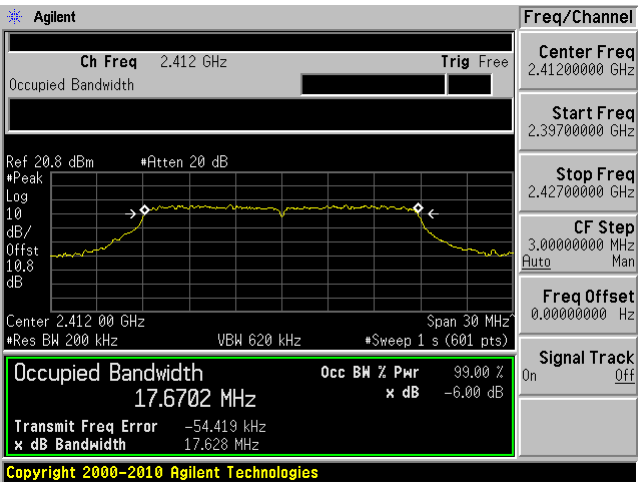


High Channel 2462 MHz

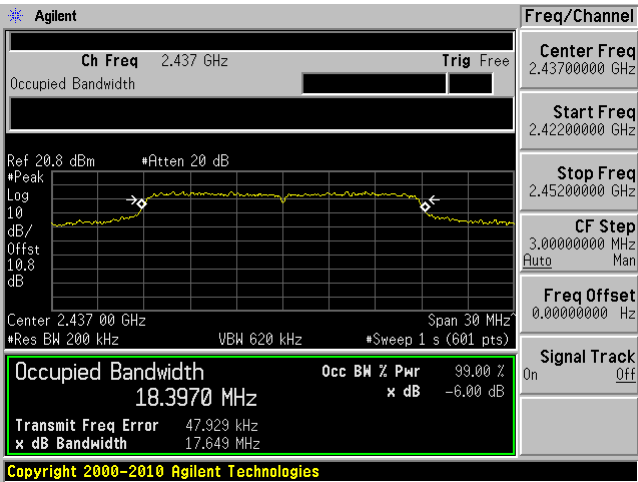


802.11n20 mode

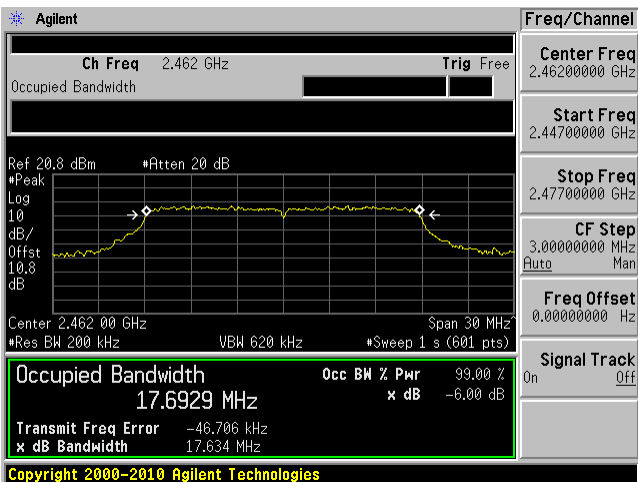
Low Channel 2412 MHz



Middle Channel 2437 MHz

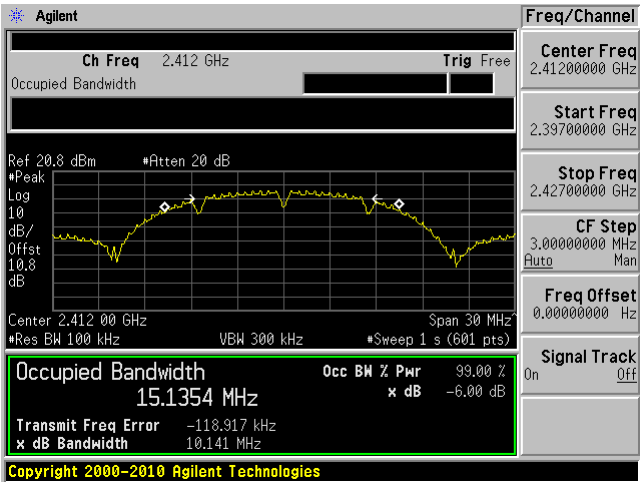


High Channel 2462 MHz

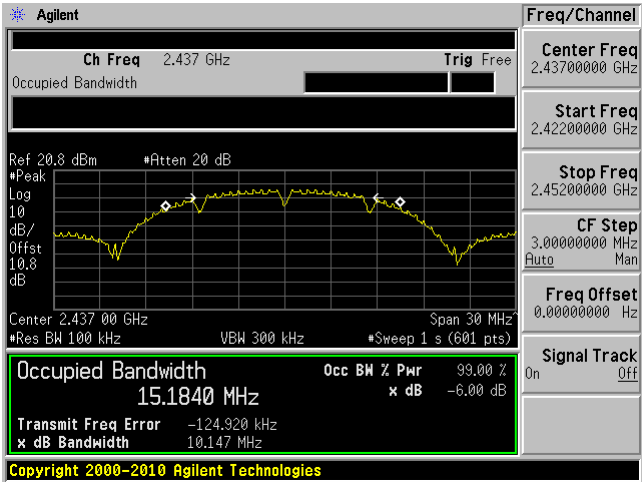


6dB OBW
802.11b mode

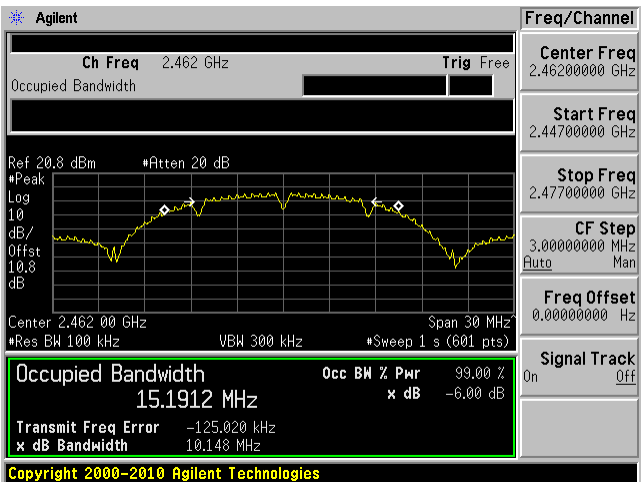
Low Channel 2412 MHz



Middle Channel 2437 MHz

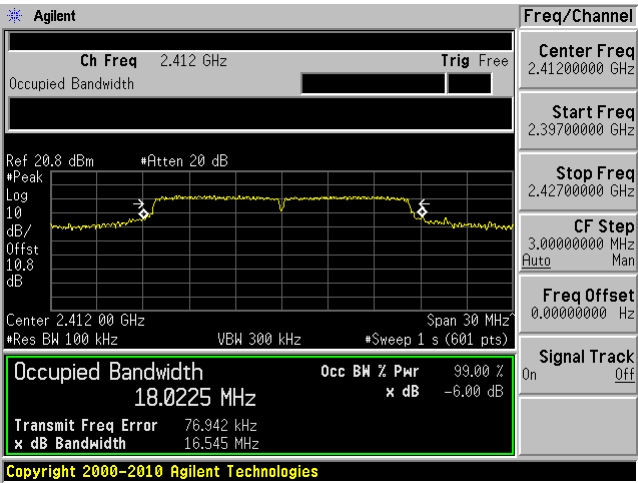


High Channel 2462 MHz

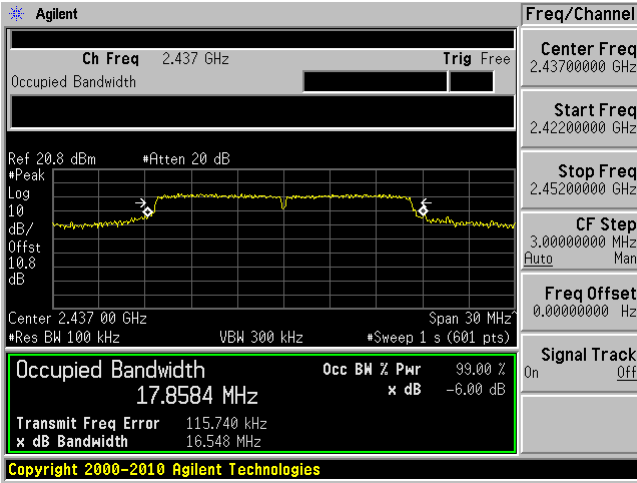


802.11g mode

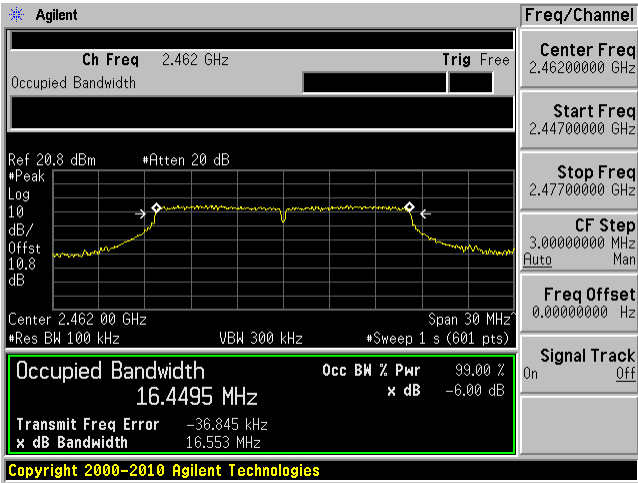
Low Channel 2412 MHz



Middle Channel 2437 MHz

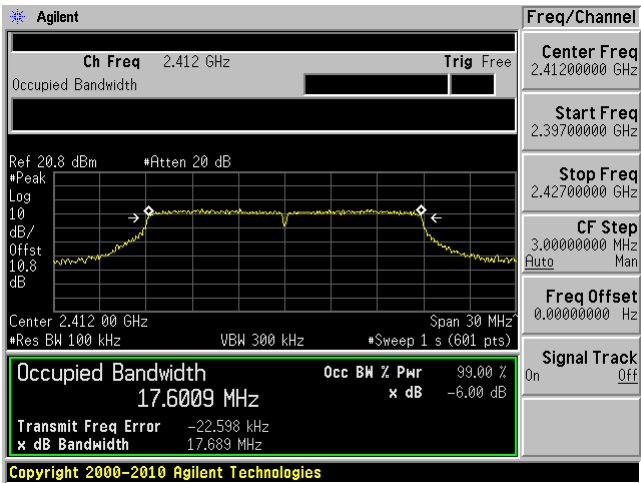


High Channel 2462 MHz

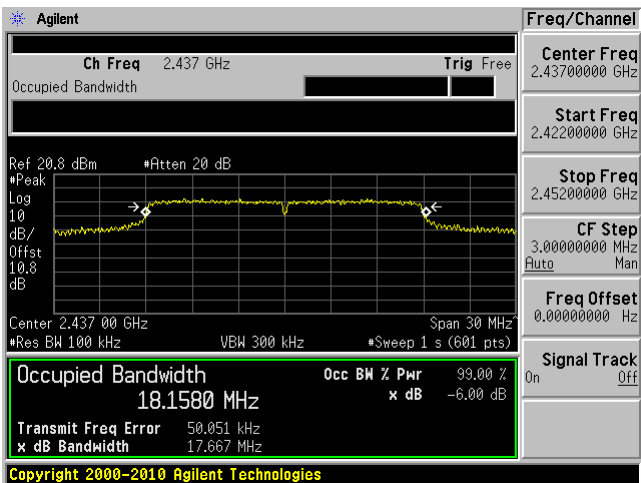


802.11n20 mode

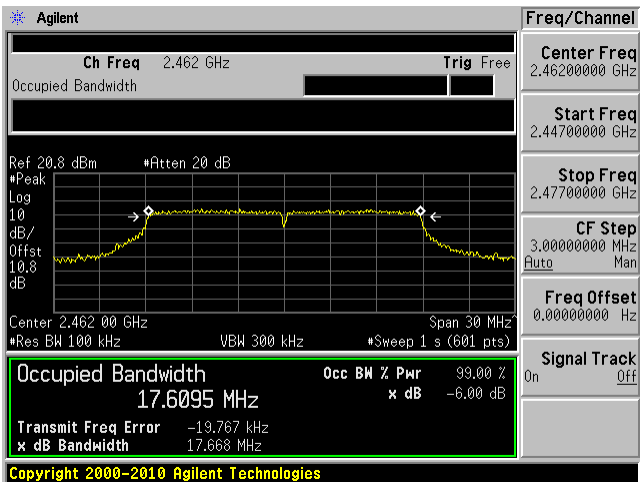
Low Channel 2412 MHz



Middle Channel 2437 MHz



High Channel 2462 MHz



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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
ETS- Lingerin	Power Sensor	7002-006	160097	2018-12-31	2 years
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

9.4 Test Environmental Conditions

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

The testing was performed by Christian McCaig on 2019-08-07 in RF site.

9.5 Test Results

Average Output Power

Channel	Frequency (MHz)	Conducted Average Power (dBm)	Limit (dBm)
802.11b mode			
1	2412	17.39	30
6	2437	17.47	30
11	2462	17.04	30
802.11g mode			
1	2412	12.20	30
6	2437	17.29	30
11	2462	9.82	30
802.11n-HT20 mode			
1	2412	8.48	30
6	2437	16.87	30
11	2462	9.28	30

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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

10.4 Test Environmental Conditions

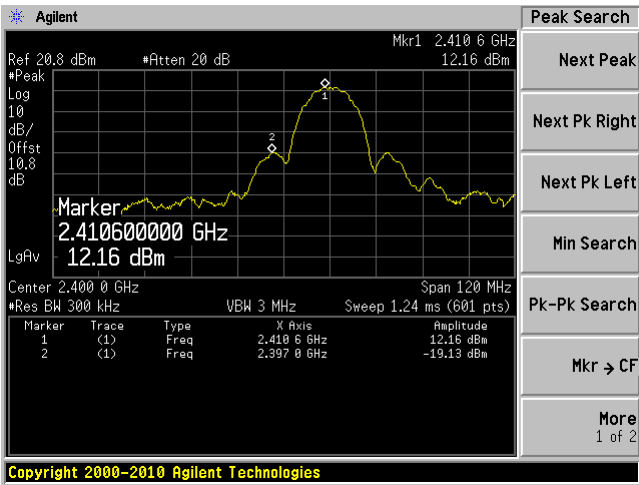
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2019-07-29 in RF site.

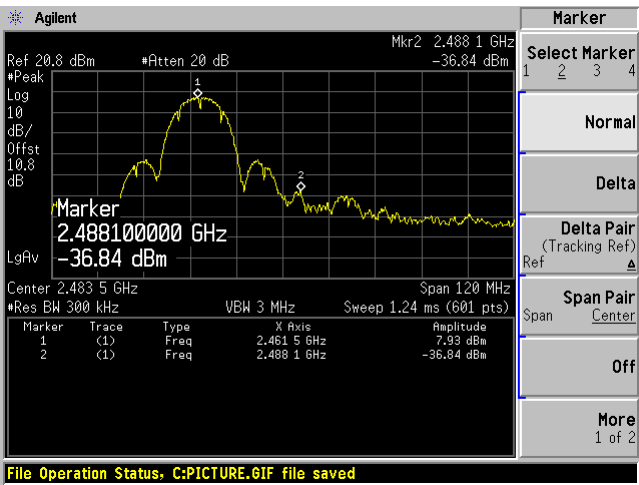
10.5 Test Results

802.11b mode

Low Channel 2412 MHz

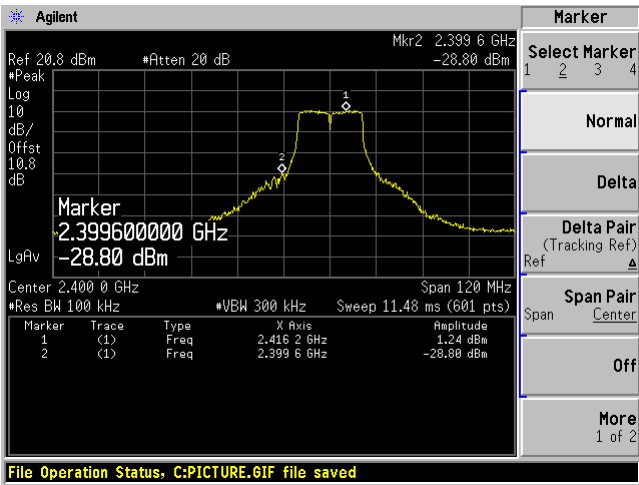


High Channel 2462 MHz

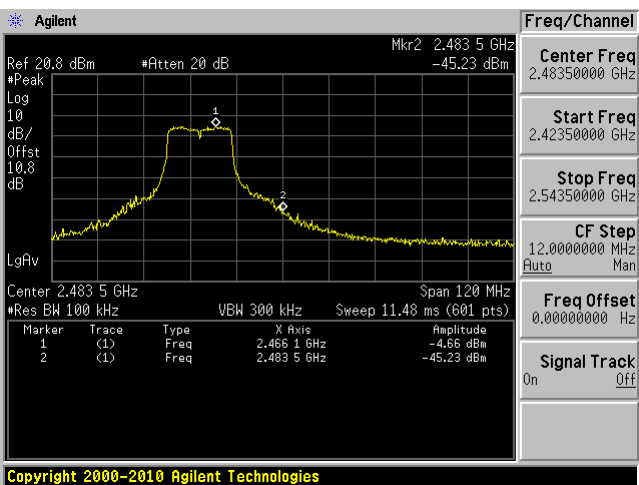


802.11g mode

Low Channel 2412 MHz

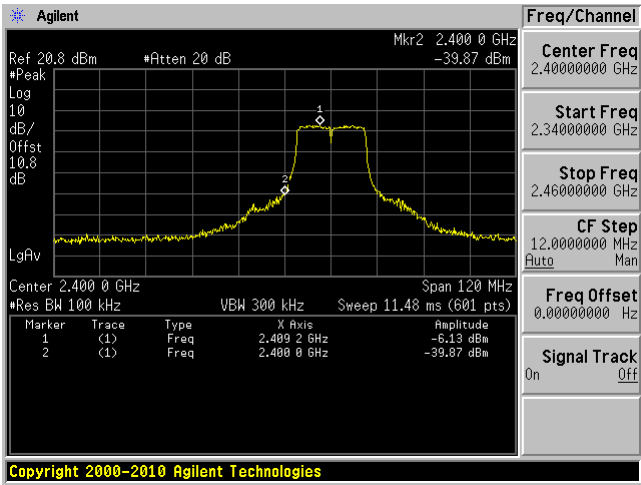


High Channel 2462 MHz

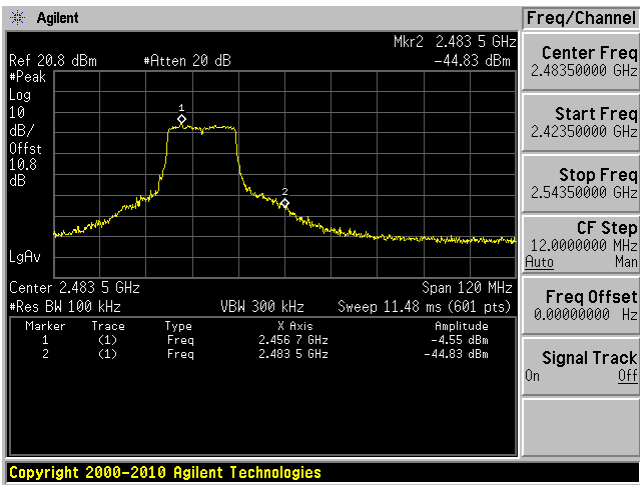


802.11n20 mode

Low Channel 2412 MHz



High Channel 2462 MHz



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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

11.4 Test Environmental Conditions

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

The testing was performed by Christian McCaig on 2019-07-29 in RF site.

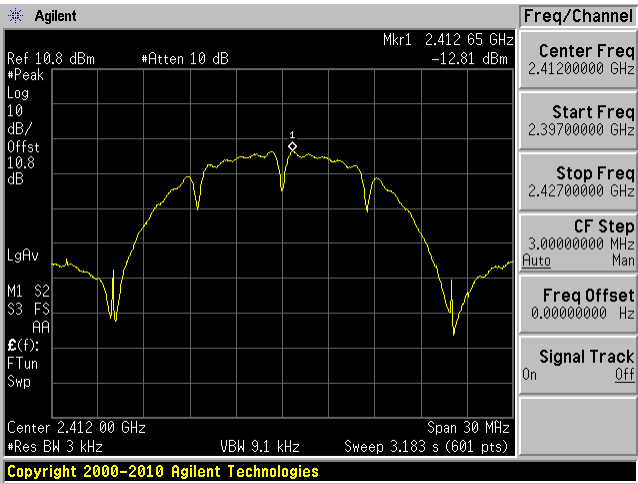
11.5 Test Results

Channel	Frequency (MHz)	PSD (dBm/3kHz)	Limit (dBm/3kHz)
802.11b mode			
Low	2412	-12.81	8
Middle	2437	-12.85	8
High	2462	-13.21	8
802.11g mode			
Low	2412	-16.21	8
Middle	2437	-11.34	8
High	2462	-18.20	8
802.11n-HT20 mode			
Low	2412	-20.26	8
Middle	2437	-11.53	8
High	2462	-18.74	8

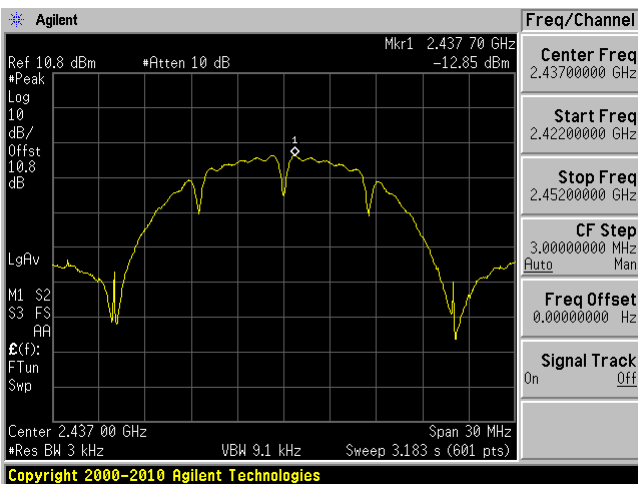
Please refer to the following plots for detailed test results

802.11b mode

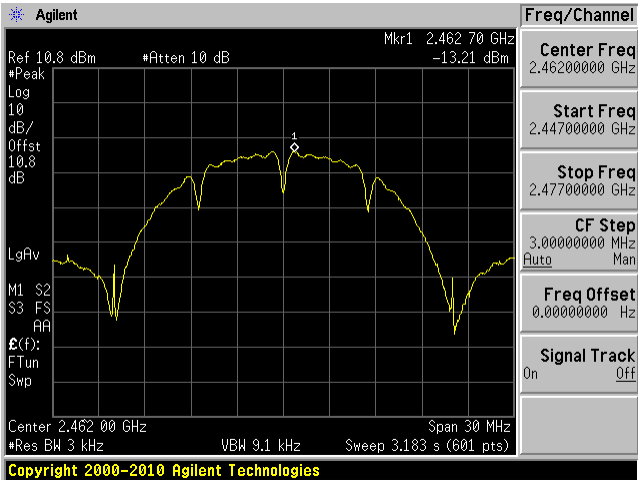
Low Channel 2412 MHz



Middle Channel 2437 MHz

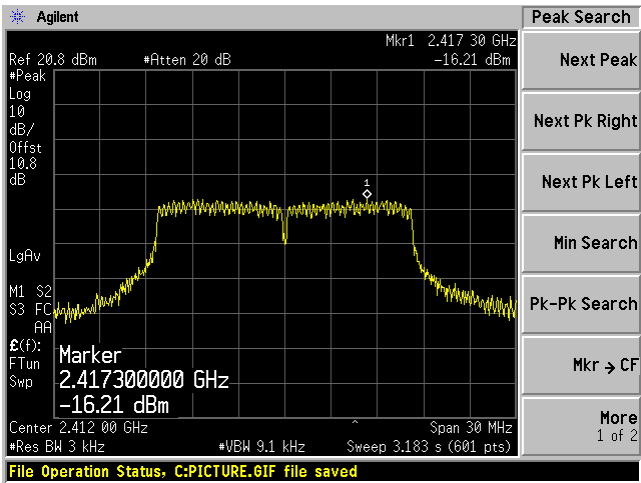


High Channel 2462 MHz

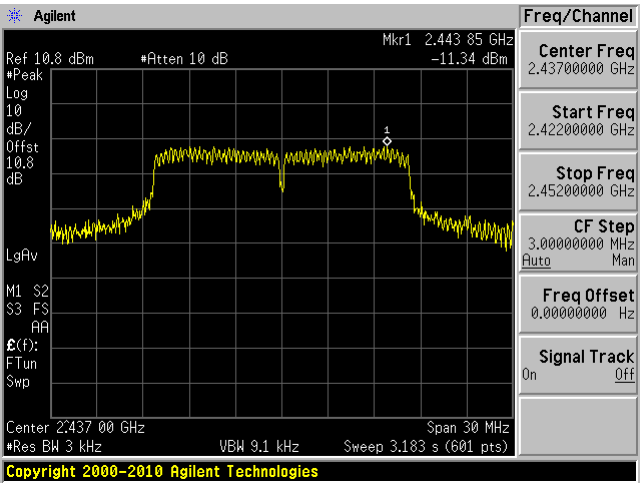


802.11g mode

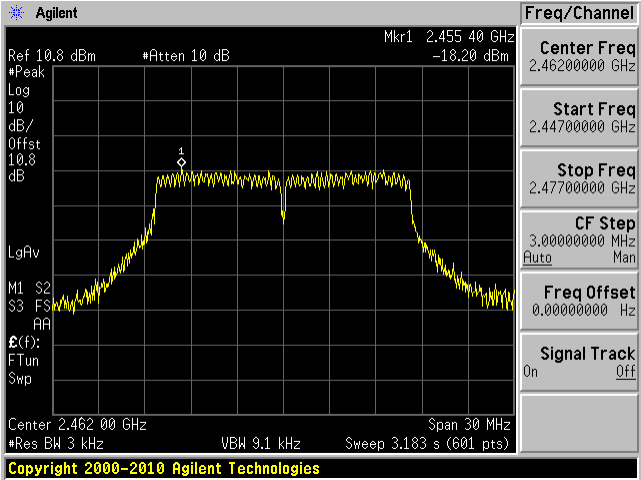
Low Channel 2412 MHz



Middle Channel 2437 MHz

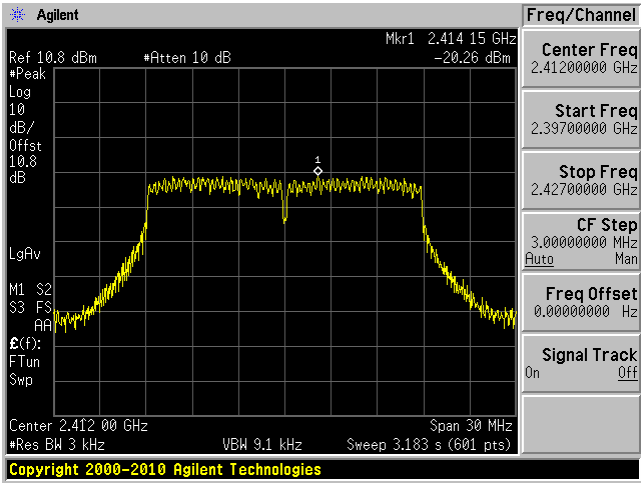


High Channel 2462 MHz

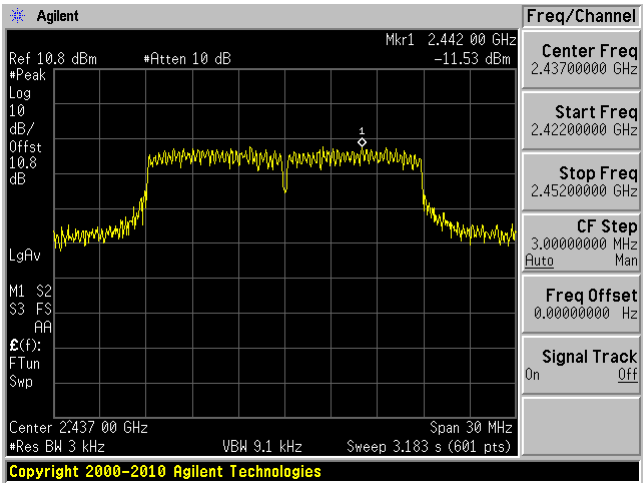


802.11n20 mode

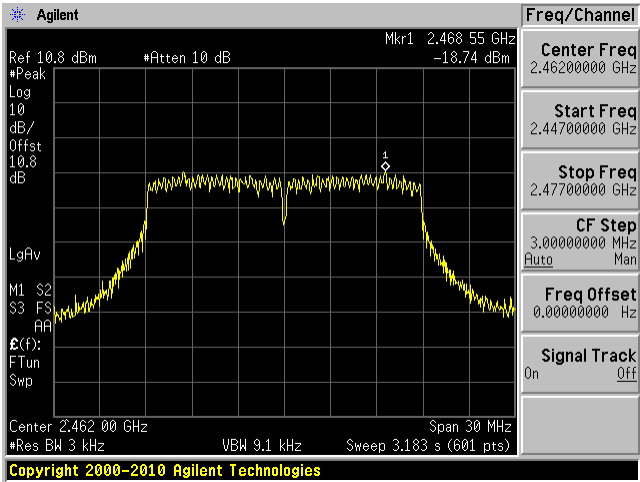
Low Channel 2412 MHz



Middle Channel 2437 MHz



High Channel 2462 MHz



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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

12.4 Test Environmental Conditions

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

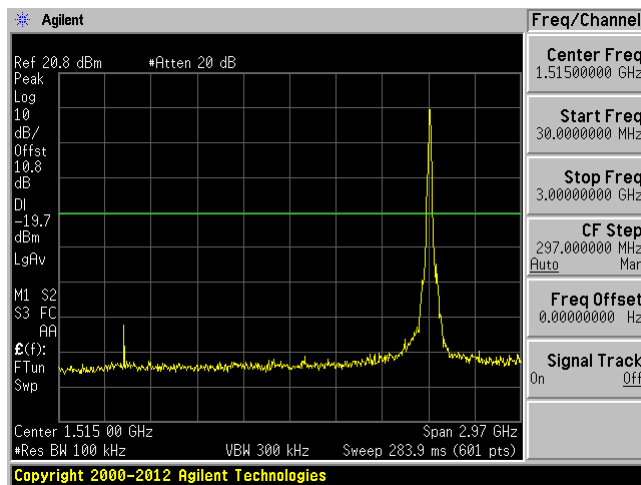
The testing was performed by Christian McCaig on 2019-07-29 in RF site.

12.5 Test Results

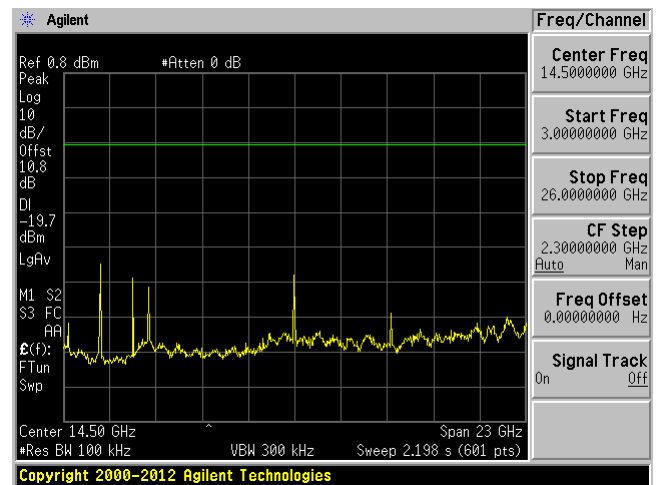
Please refer to following plots.

802.11b mode

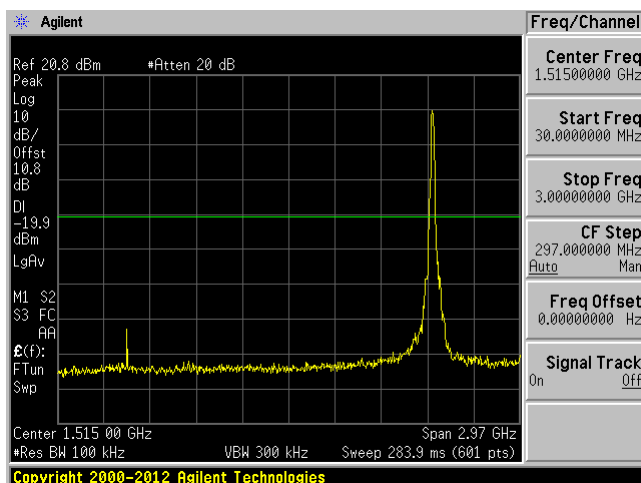
Low Channel 30MHz – 3 GHz



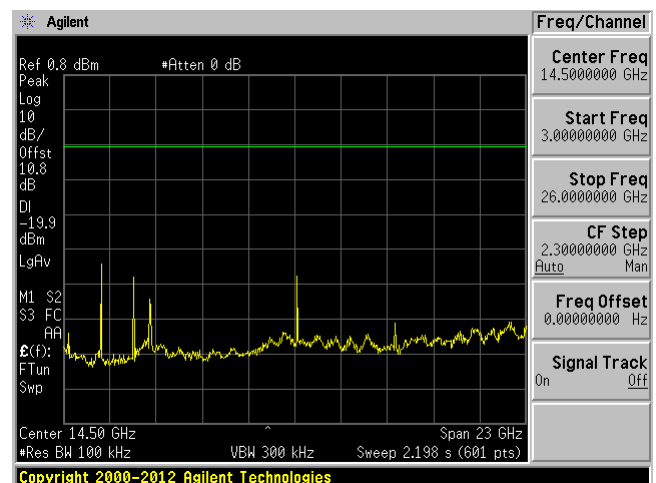
Low Channel 3 GHz – 26 GHz



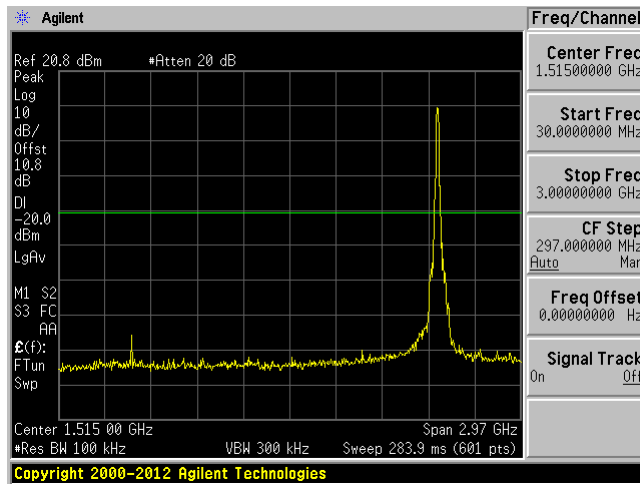
Middle Channel 30 MHz – 3 GHz



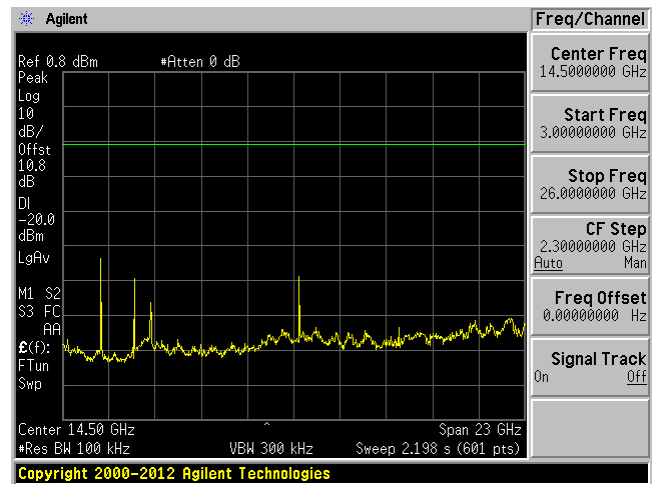
Middle Channel 3 GHz – 26 GHz



High Channel 30 MHz – 3 GHz

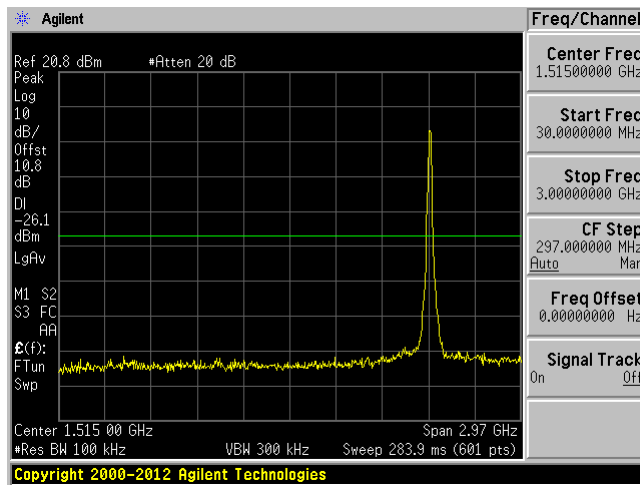


High Channel 3 GHz – 26 GHz

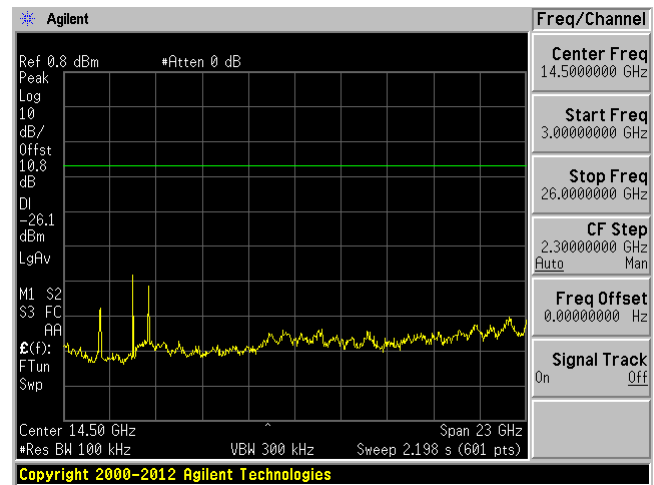


802.11g mode

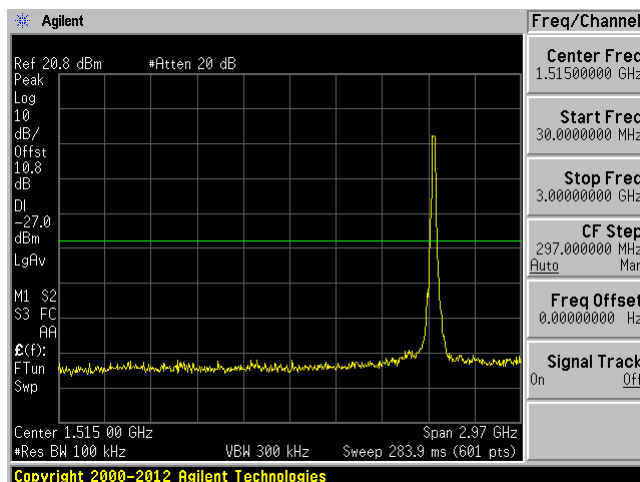
Low Channel 30 MHz – 3 GHz



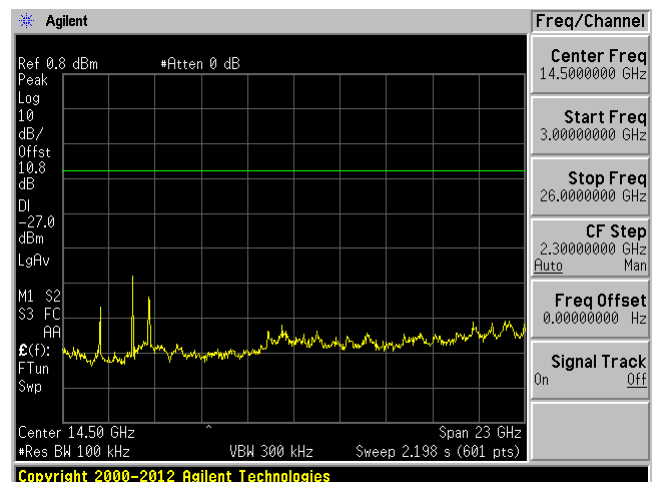
Low Channel 3 GHz – 26 GHz



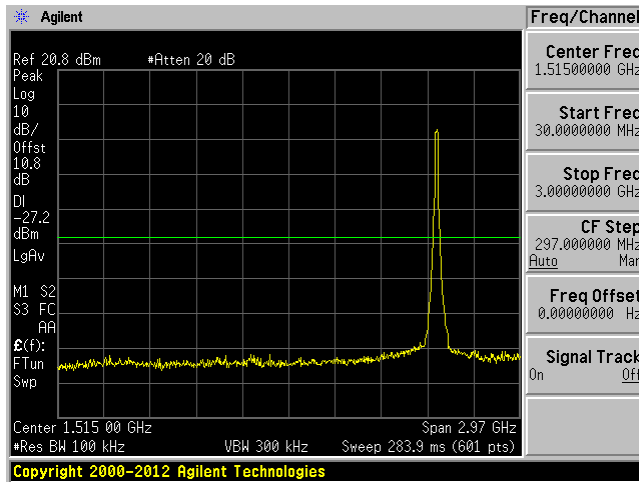
Middle Channel 30 MHz – 3 GHz



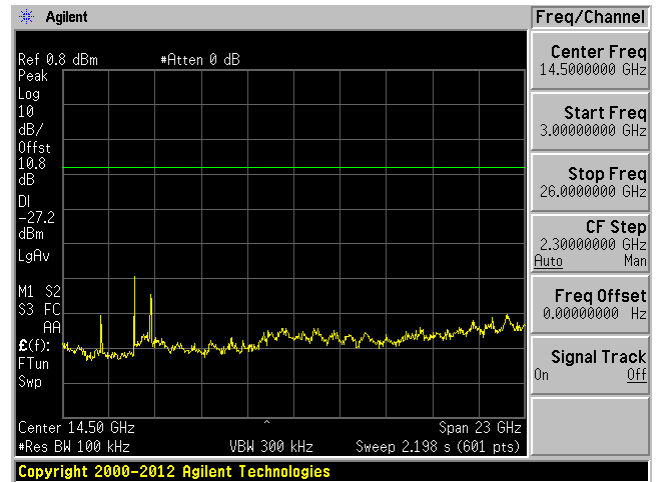
Middle Channel 3 GHz – 26 GHz



High Channel 30 MHz – 3 GHz

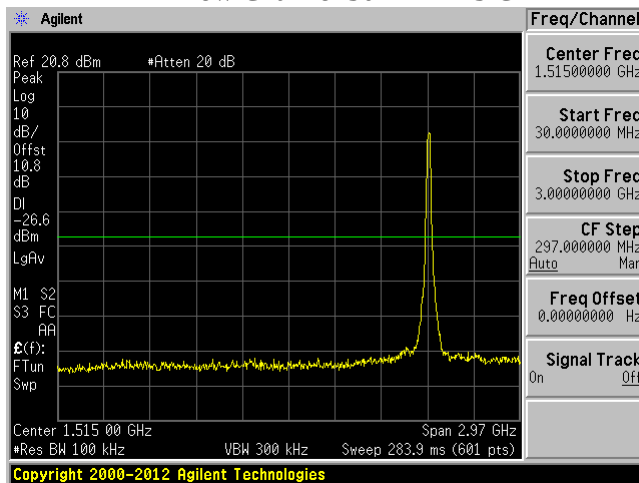


High Channel 3 GHz – 26 GHz

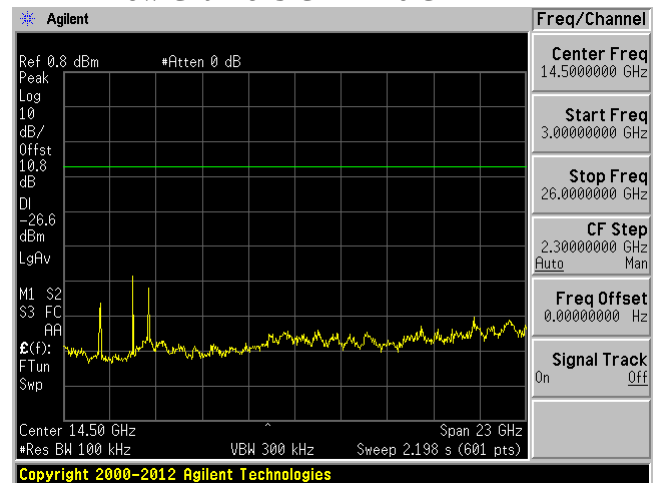


802.11n20 mode

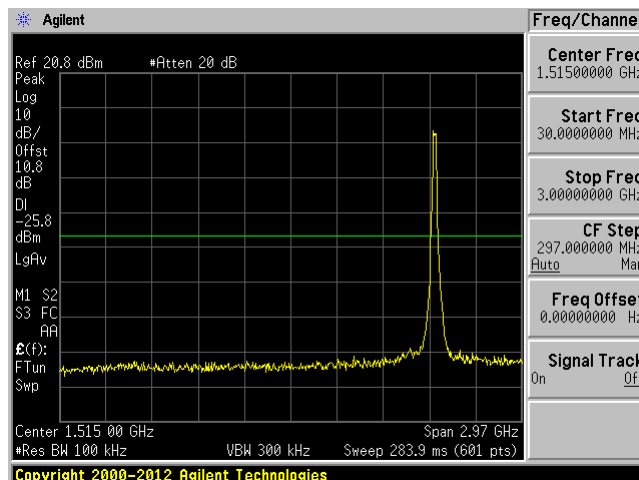
Low Channel 30 MHz – 3 GHz



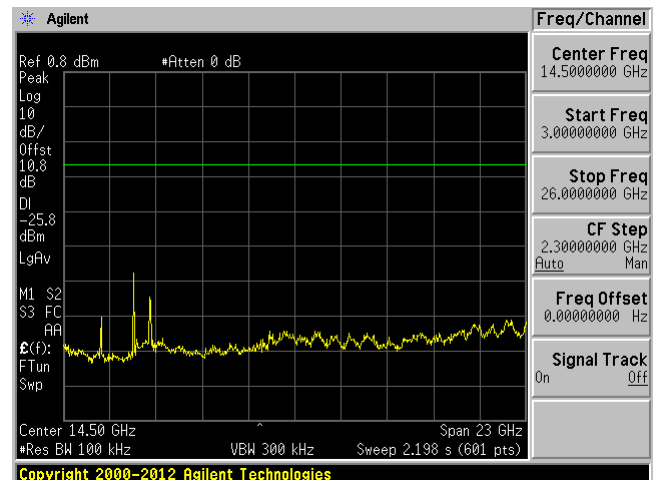
Low Channel 3 GHz – 26 GHz



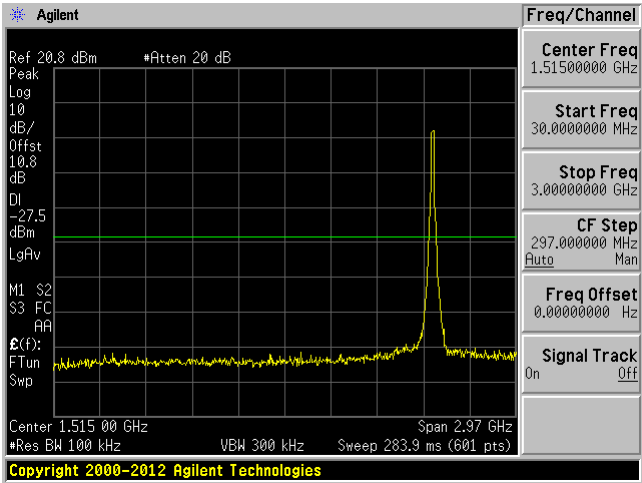
Middle Channel 30 MHz – 3 GHz



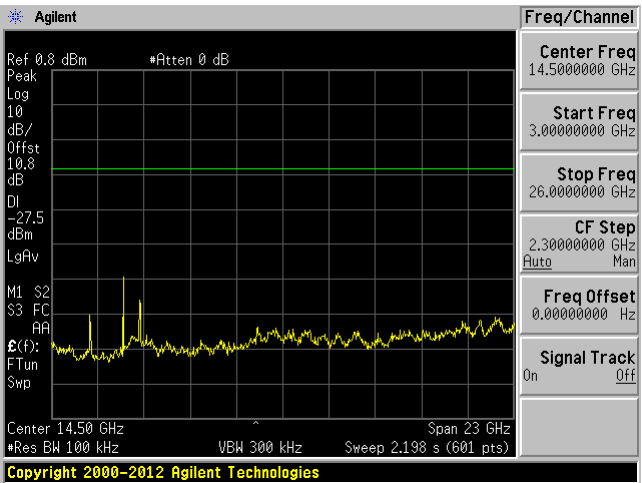
Middle Channel 3 GHz – 26 GHz



High Channel 30 MHz – 3 GHz



High Channel 3 GHz – 26 GHz



13 Annex A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

14 Annex B (Normative) – EUT External Photographs

Please refer to the attachment.

15 Annex C (Normative) – EUT Internal Photographs

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 17025:2005 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 2nd day of October 2018.

A blue ink signature of the Vice President, Accreditation Services.

Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2020
Revised June 5, 2019

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 ---