



DATE: 17 December 2019

I.T.L. (PRODUCT TESTING) LTD. FCC Radio Test Report

for

Orcam Technologies Ltd.

Equipment under test:

Portable, Pocket- Sized Smart Pen Scanner

Orcam Read

Tested by:

M. Zohar

Approved by:

D. Shidlowsky

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Measurement/Technical Report for Orcam Technologies Ltd.

Portable, Pocket- Sized Smart Pen Scanner

Orcam Read FCC ID: 2AAWI-READ

This report concerns:	Original Grant: X
	Class I Change:
	Class II Change:
Equipment type:	FCC: (DTS) Digital Transmission System
Limits used:	47CFR15 Section 15.247
Measurement procedure use	d is KDB 558074 D01 v05r02 and ANSI

Measurement procedure used is KDB 558074 D01 v05r02 and ANSI C63.10:2013

Application for Certification prepared by: R. Pinchuck ITL (Product Testing) Ltd. 1 Bat Sheva St. Lod 7116002 e-mail <u>Rpinchuck@itlglobal.org</u> Applicant for this device: (different from "prepared by") Ram Ben Yehuda 3 Kiryat Mada St. PO Box 45157 Jerusalem, 9777603, Israel Tel: +972-2-591-7805 Fax: +972-2-586-0121 e-mail: : Rami.Ben-Yehuda@orcam.com



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1. General Information

1.1 Administrative Information

Manufacturer:	Orcam Technologies Ltd.
Manufacturer's Address:	3 Kiryat Mada St. P.O. Box 45157 Jerusalem, 9777603, Israel Tel: +972-2-591-7805 Fax: +972-2-586-0121
Manufacturer's Representative:	Ram Ben-Yehuda
Equipment Under Test (E.U.T):	Portable, Pocket- Sized Smart Pen Scanner
Equipment PMN:	Orcam Read
Equipment Serial No.:	19350053
Date of Receipt of E.U.T:	November 10, 2019
Start of Test:	November 10, 2019
End of Test:	November 28, 2019
Test Laboratory Location:	I.T.L (Product Testing) Ltd. 1 Batsheva St., Lod ISRAEL 7120101
Test Specifications:	FCC Part 15, Subpart C, Section 15.247



1.2 List of Accreditations

The EMC laboratory of I.T.L. is accredited by the following bodies:

- 1. The American Association for Laboratory Accreditation (A2LA) (U.S.A.), Certificate No. 1152.01.
- 2. The Federal Communications Commission (FCC) (U.S.A.), FCC Designation No. IL1005.
- 3. The Israel Ministry of the Environment (Israel), Registration No. 1104/01.
- 4. Department of Innovation, Science and Economic Development (ISED) Canada, CAB identifier: IL1002

I.T.L. Product Testing Ltd. is accredited by the American Association for Laboratory Accreditation (A2LA) and the results shown in this test report have been determined in accordance with I.T.L.'s terms of accreditation unless stated otherwise in the report.



1.3 *Product Description*

Orcam Read is a portable, pocket- sized smart pen scanner. Orcam Read provides the most advanced solution for those who suffer from reading difficulties such as dyslexia.

Working voltage	5.0VDC Rechargeable battery
Mode of operation	Transceiver
Modulations	For Wi-Fi/g: OFDM(BPSK,QPSK,16QAM ,64QAM) For Wi-Fi/n: OFDM(BPSK,QPSK,16QAM ,64QAM) For BLE: GFSK
Assigned Frequency Range	2400.0-2483.5MHz
Operating Frequency Range	For Wi-Fi/g/n: 2412.0-2462.0MHz For BLE: 2402.0-2480.0MHz
Conducted power	~ 15dBm
Antenna Gain	-0.87dBi
Modulation BW	For Wi-Fi/g/n: 20MHz For BLE: 2MHz
Bit rate (Mbit/s)	For Wi-Fi/g: 6, 9, 12, 18, 24, 36, 48, 54 For Wi-Fi/n: 6.5,13,19.5,26,39,52,58.5,65 For BLE: 1,2,3

1.4 Test Methodology

Both conducted and radiated testing was performed according to the procedures in KDB 558074 D01 v05 r02 and ANSI C63.10: 2013. Radiated testing was performed at an antenna to EUT distance of 3 meters.

1.5 Test Facility

Emissions tests were performed at I.T.L.'s testing facility in Lod, Israel. I.T.L.'s EMC Laboratory is accredited by A2LA, certificate No. 1152.01 and its FCC Designation Number is IL1005.



1.6 Measurement Uncertainty

Conducted Emission

Conducted Emission (CISPR 11, EN 55011, CISPR 22, EN 55022, ANSI C63.4) 0.15 – 30 MHz:

Expanded Uncertainty (95% Confidence, K=2): \pm 3.44 dB

Radiated Emission Radiated Emission (CISPR 11, EN 55011, CISPR 22, EN 55022, ANSI C63.4) for open

site:

30-1000MHz:

Expanded Uncertainty (95% Confidence, K=2): $\pm 4.96 \text{ dB}$

1 GHz to 6 GHz Expanded Uncertainty (95% Confidence, K=2): ±5.19 dB

>6 GHz Expanded Uncertainty (95% Confidence, K=2): ±5.51 dB



2. System Test Configuration

2.1 Justification

- 1. The E.U.T contains 2 optional transceivers: IEEE 802.15.1 standard (BLE) or IEEE 802.11g/n standard (Wi-Fi/g/n) with only 20MHz CBW.
- 2. For BLE The unit was evaluated while transmitting at the low channel (2402MHz), the mid channel (2440MHz) and the high channel (2480MHz). For Wi-Fi /g/n The unit was evaluated while transmitting at the low channel (2412MHz), the mid channel (2437MHz) and the high channel (2462MHz).
- 3. The evaluation was performed while the E.U.T was connected to an AC/DC power supply in charge mode as the "worst case".
- 4. Conducted emission tests were performed with the E.U.T. antenna terminal connected by a RF cable to the Spectrum Analyzer through a 30dB external attenuator.
- 5. Final radiated emission for Wi-Fi g/n modes tests were performed using the lowest and highest bit rates for each different protocol type. The bit rates for each protocol are shown in the table below:

Protocol Type	"Worst Case" Bit Rate
Wi-Fi/g	6,54 Mbit/s
Wi-Fi/n	6.5,65 Mbit/s (MCS0,MCS7)

7. Final radiated emission tests was performed after exploratory emission testing that was performed in 3 orthogonal polarities to determine the "worst case" radiation. According to below results the worst case was at the X axis

Orientation	Frequency	2 nd Harmonic	3 rd Harmonic	Band Edge
Orientation	(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)
	2412.0	47.4	55.2	61.2
X axis	2437.0	48.0	55.9	-
	2462.0	47.1	55.6	73.8
	2412.0	47.0	53.8	59.8
Y axis	2437.0	47.1	54.2	-
	2462.0	46.9	54.0	73.5
	2412.0	45.2	47.6	57.4
Z axis	2437.0	45.1	48.0-	-
	2462.0	45.5	50.0	71.3

Figure 1. Screening Results



2.2 EUT Exercise Software

No special exercise software was used.

2.3 Special Accessories

Equipment	Manufacturer	Part Number	Serial Number
AC/DC power supply	Shenzhen Super Eagle Technology Co. Ltd	СН06-050200-ЕU	N/A

2.4 Equipment Modifications

Initially the E.U.T failed in the high band edge testing at the high channel (2462MHz).

The customer reduced the fundamental power until the E.U.T passed the specified limit. Power was reduced by using the value code 8 for the power configuration script.

2.5 Configuration of Tested System

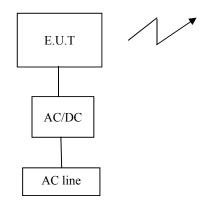


Figure 2. Configuration of Tested System – Radiated

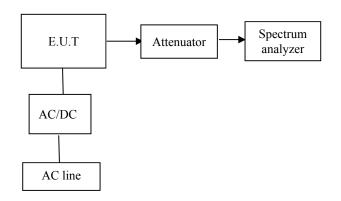


Figure 3. Configuration of Tested System - Conducted

Orcam Technologies Ltd.





3. Conducted & Radiated Measurement Test Set-Up Photos



Figure 4. Conducted Emission Test from AC Line Test

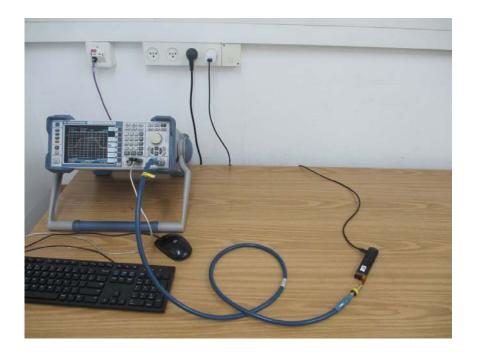


Figure 5. Conducted Emission Test





Figure 6. Radiated Emission Test, 0.009-30MHz



Figure 7. Radiated Emission Test, 30-200MHz





Figure 8. Radiated Emission Test, 200-1000MHz



Figure 9. Radiated Emission Test, 1-18GHz





Figure 10. Radiated Emission Test, 18-26.5GHz



4. Conducted Emission From AC Mains

4.1 Test Specification

FCC Part 15, Subpart C, Section 15.207

4.2 Test Procedure

(Temperature (20°C)/ Humidity (45%RH))

The E.U.T operation mode and test setup are as described in Section 2 of this report. In order to minimize background noise interference, the conducted emission testing was performed inside a shielded room, with the E.U.T placed on a 0.8 meter high wooden table, 0.4 meter from the room's vertical wall. In the case of a floor-standing E.U.T., it was placed on the horizontal ground plane.

The E.U.T was powered from 115 V AC / 60 Hz via 50 Ohm / 50 μ Hn Line Impedance Stabilization Network (LISN) on the phase and neutral lines. The LISN's were grounded to the shielded room ground plane (floor), and were kept at least 0.8 meters from the nearest boundary of the E.U.T.

The center of the E.U.T.'s AC cable was folded back and forth, in order to form a bundle less than 0.40 meters and a total cable length of 1 meter.

The effect of varying the position of the cables was investigated to find the configuration that produces maximum emission. The configurations tested are shown in the photographs, *Figure 4* and *Figure 5*.

The emission voltages at the LISN's outputs were measured using a computerized receiver, complying with CISPR 16 requirements. The specification limits are loaded to the receiver and are displayed on the receiver's spectrum display.

The E.U.T was evaluated in TX operation mode (WI-FI/g 6Mbps)

A frequency scan between 0.15 and 30 MHz was performed at 9 kHz I.F. band width, using peak detection.

The spectral components having the highest level on each line were measured using a quasi-peak and average detector.

Frequency of emission (MHz)	Conducted limit (dBµV)	
	Quasi-peak	Average
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

4.3 Test Limit

* Decreases with the logarithm of the frequency.



4.4 Test Results

JUDGEMENT:

Passed by 4.94 dB

The margin between the emission levels and the specification limit is, in the worst case, -19.06 dB for the phase line at 0.578 MHz and -4.94 dB at 0.578 MHz for the neutral line.

The EUT met the F.C.C. Part 15, Subpart C specification requirements.

The details of the highest emissions are given in *Figure 11* to *Error! Reference source not found.*.



Detectors: :

Conducted Emission

E.U.T Description	Portable, Pocket- Sized Smart Pen Scanner
Туре	Orcam Read
Serial Number:	19350053
Specification: Lead:	FCC Part 15, Subpart C Phase

Peak, Quasi-peak, Average **Power Operation** AC/DC power supply

	IT PEAK LIST (Fina	al Measurement Re	sults)
Trace1:	CE22BQP		
Trace2:	CE22BAP		
Trace3:			
TRACE	FREQUENCY	LEVEL dBµV	DELTA LIMIT dB
1 Quasi Peak		39.89	-24.49
2 Average	242 kHz	19.49	-32.53
1 Quasi Peak	402 kHz	37.42	-20.38
2 Average	426 kHz	24.20	-23.12
2 Average	578 kHz	26.93	-19.06
1 Quasi Peak	582 kHz	35.75	-20.24
1 Quasi Peak	886 kHz	33.52	-22.47
2 Average	1.042 MHz	25.76	-20.23
1 Quasi Peak	1.382 MHz	21.92	-34.07
2 Average	1.582 MHz	18.49	-27.50
1 Quasi Peak	2.51 MHz	27.88	-28.11
2 Average	2.51 MHz	18.59	-27.41
1 Quasi Peak	4.01 MHz	22.23	-33.76
2 Average	4.45 MHz	12.22	-33.77
2 Average	9.126 MHz	17.23	-32.76
1 Quasi Peak	9.166 MHz	27.16	-32.83
2 Average	13.418 MHz	21.10	-28.89
1 Quasi Peak	17.378 MHz	26.79	-33.20
1 Quasi Peak	17.694 MHz	30.71	-29.28
2 Average	17.694 MHz	24.80	-25.19

Date: 24.NOV.2019 16:03:45

Figure 11. Detectors: Peak, Quasi-peak, Average

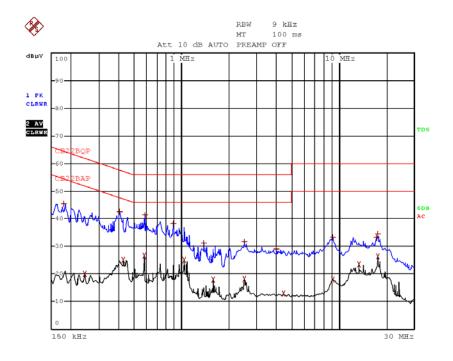
Note: QP Delta/Av Delta refers to the test results obtained minus specified requirement; thus a positive number indicates failure, and a negative result indicates that the product passes the test.



Conducted Emission

E.U.T Description	Portable, Pocket- Sized Smart Pen Scanner
Туре	Orcam Read
Serial Number:	19350053

Specification:	FCC Part 15, Subpart C
Lead:	Phase
Detectors:	Peak, Quasi-peak, Average
Power Operation	AC/DC power supply



Date: 24.NOV.2019 15:58:24

Figure 12. Detectors: Peak, Quasi-peak, Average



Conducted Emission

E.U.T Description	Portable, Pocket- Sized Smart Pen Scanner
Туре	Orcam Read
Serial Number:	19350053
Specification:	FCC Part 15, Subpart C
Lead:	Neutral
Detectors:	Peak, Quasi-peak, Average

AC/DC power supply

		T PEAK LIST (Fina	al Measurement Re	sults)
Tra	cel:	CE22BQP		
Tra	ce2:	CE22BAP		
Tra	ce3:			
	TRACE	FREQUENCY	LEVEL dBµV	DELTA LIMIT dB
2	Average	194 kHz	32.55	-21.30
1	Quasi Peak	198 kHz	38.07	-25.62
1	Quasi Peak	426 kHz	39.94	-17.38
2	Average	426 kHz	32.05	-15.27
1	Quasi Peak	578 kHz	50.75	-5.24
2	Average	578 kHz	41.05	-4.94
1	Quasi Peak	1.042 MHz	50.33	-5.66
2	Average	1.042 MHz	34.78	-11.21
1	Quasi Peak	1.582 MHz	41.55	-14.44
2	Average	1.582 MHz	26.15	-19.85
1	Quasi Peak	2.51 MHz	39.40	-16.59
2	Average	2.51 MHz	26.52	-19.47
2	Average	4.014 MHz	14.18	-31.81
1	Quasi Peak	4.03 MHz	23.76	-32.23
2	Average	9.11 MHz	17.92	-32.08
1	Quasi Peak	9.158 MHz	26.48	-33.51
1	Quasi Peak	12.438 MHz	27.70	-32.29
2	Average	13.358 MHz	22.64	-27.35
1	Quasi Peak	17.694 MHz	29.66	-30.33
2	Average	17.694 MHz	24.79	-25.20

Date: 24.NOV.2019 15:52:36

Power Operation

Figure 13. Detectors: Peak, Quasi-peak, Average

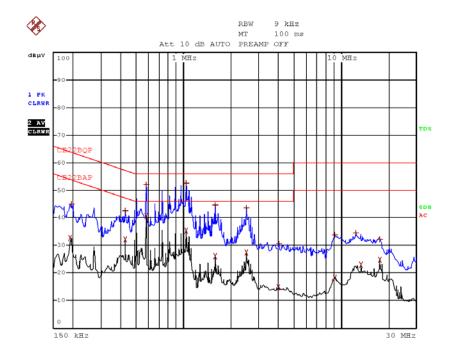
Note: QP Delta/Av Delta refers to the test results obtained minus specified requirement; thus a positive number indicates failure, and a negative result indicates that the product passes the test.



Conducted Emission

E.U.T Description	Portable, Pocket- Sized Smart Pen Scanner
Туре	Orcam Read
Serial Number:	19350053

Specification:	FCC Part 15, Subpart C
Lead:	Neutral
Detectors:	Peak, Quasi-peak, Average
Power Operation	AC/DC power supply



Date: 24.NOV.2019 15:50:37

Figure 14 Detectors: Peak, Quasi-peak, Average



Instrument	Manufacturer	Model	Serial No.	Last Calibration Date	Next Calibration Due	
LISN	Fischer	FCC-LISN-25A	127	September 8, 2019	September 30, 2020	
Transient Limiter	НР	11947A	3107A03041	September 16, 2019	September 30, 2020	
EMI Receiver	Rohde & Schwarz	ESCI7	100724	February 27, 2019	February 28, 2020	
Cable CE Chamber 3M + 3M	Testline 18 + RJ214	11556	-	March 31, 2019	March 31, 2020	

4.5 Test Equipment Used; Conducted Emission from AC Mains

Figure 15 Test Equipment Used



5. 6 dB Minimum Bandwidth

5.1 Test Specification

FCC Part 15, Subpart C, Section 247(a)(2)

5.2 Test Procedure

(Temperature (20°C)/ Humidity (52%RH))

The E.U.T operation mode and test set-up are as described in Section 2 of this report.

The E.U.T. antenna terminal was connected to the Spectrum Analyzer through an external attenuator and an appropriate coaxial cable Special attention was taken to prevent Spectrum Analyzer RF input overload.

The spectrum bandwidth of the E.U.T. at the point of 6 dB below maximum peak power was measured and recorded. The RBW was set to 100 kHz.

5.3 Test Limit

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.



5.4 Test Results

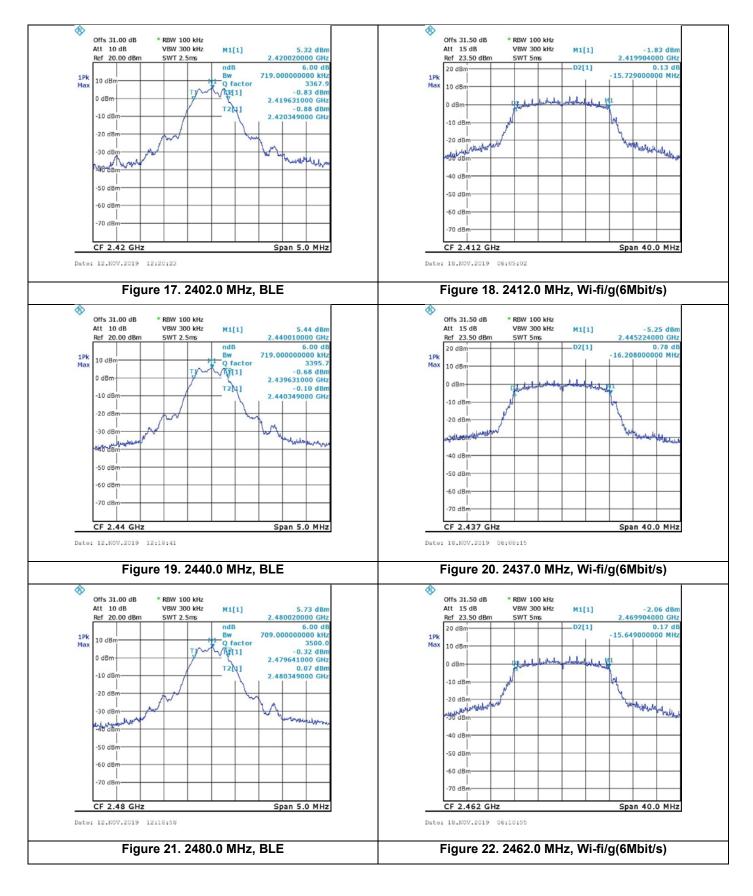
Protocol Type	Operation Frequency	Reading	Limit
	(MHz)	(kHz)	(kHz)
	2402.0	719.0	>500.0
BLE	2440.0	719.0	>500.0
	2480.0	709.0	>500.0
	2412.0	15,729.0	>500.0
Wi-fi/g(6Mbit/s)	2437.0	16,208.0	>500.0
	2462.0	15,649.0	>500.0
	2412.0	15,968.0	>500.0
Wi-fi/g(54Mbit/s)	2437.0	16,457.0	>500.0
	2462.0	16,208.0	>500.0
	2412.0	16,926.0	>500.0
Wi-fi/n(6.5Mbit/s)	2437.0	16,607.0	>500.0
	2462.0	15,888.0	>500.0
	2412.0	17,405.0	>500.0
Wi-fi/n(65Mbit/s)	2437.0	17,166.0	>500.0
	2462.0	16,926.0	>500.0

Figure 16 6 dB Minimum Bandwidth

JUDGEMENT: Passed

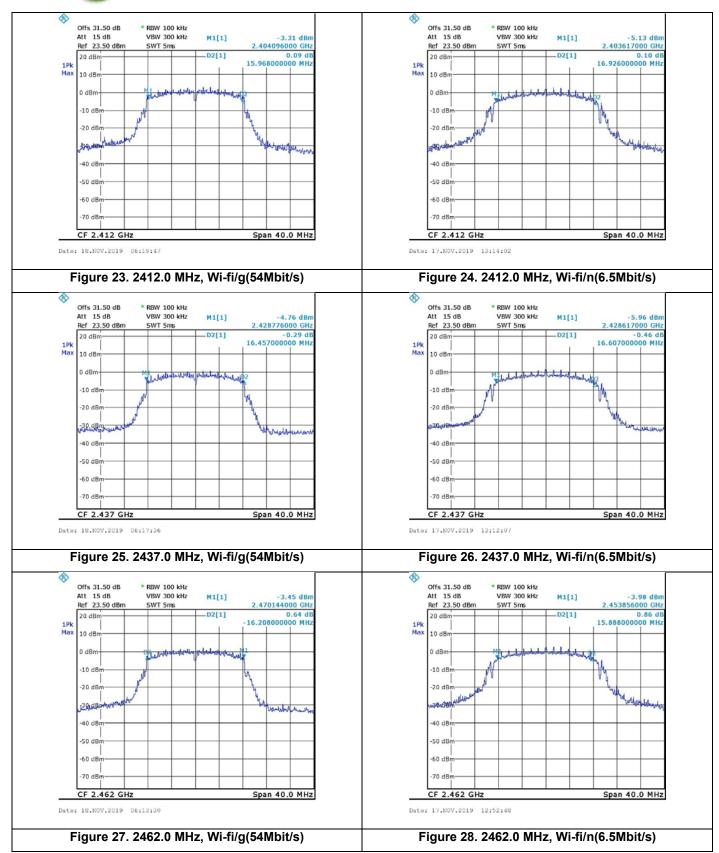
For additional information see *Figure 17* to *Figure 31*.

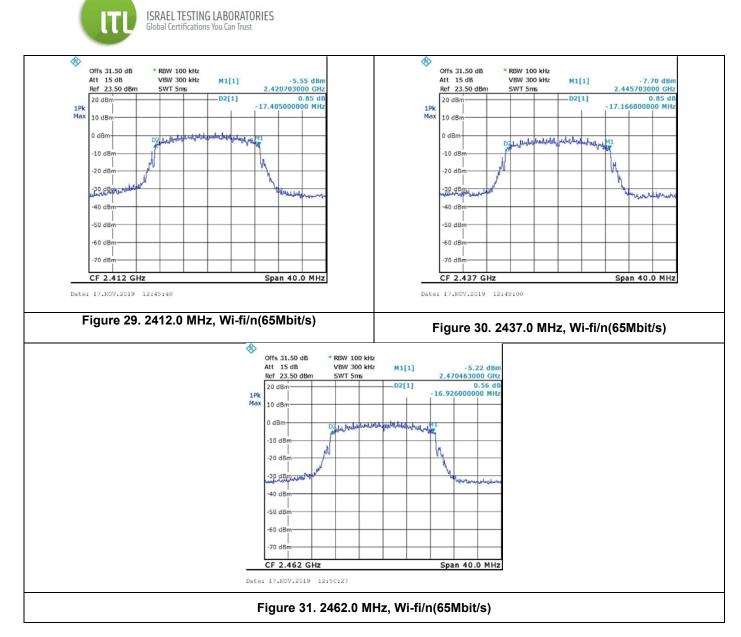






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5.5	Test Equipment Used; 6dB Bandwidth
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Instrument	Manufacturer	Model	Serial No.	Last Calibration Date	Next Calibration Due
Spectrum Analyzer	R&S	FSL6	100194	March 24, 2019	March 31, 2020
30dB Attenuator	MCL	BW-S30W5	533	December 24, 2018	December 31, 2019
RF Cable	Huber Suner	Sucofelex	27502/4PEA	December 24, 2018	December 31, 2019
RF Cable	Itl 1846				

Figure 32 Test Equipment Used



6. Maximum Conducted Output Power

6.1 Test Specification

FCC, Part 15, Subpart C, Section 247(b)(3)

6.2 Test Procedure

(Temperature (20°C)/ Humidity (58%RH))

The E.U.T operation mode and test set-up are as described in Section 2 of this report.

The E.U.T. antenna terminal was connected to the Spectrum Analyzer through an external attenuator and an appropriate coaxial cable. Special attention was taken to prevent Spectrum Analyzer RF input overload.

6.3 Test Limit

The maximum peak conducted output power of the intentional radiator for systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt.

Protocol Type	Operation Frequency	Power	Power	Limit	Margin
• •	(MHz)	(dBm)	(mW)	(mW)	(mW)
	2402.0	6.7	4.7	1000.0	-995.3
BLE	2440.0	6.5	4.5	1000.0	-995.5
	2480.0	6.8	4.8	1000.0	-995.2
	2412.0	15.6	36.3	1000.0	-963.7
Wi-fi/g(6Mbit/s)	2437.0	13.9	24.5	1000.0	-975.5
	2462.0	14.9	30.9	1000.0	-969.1
	2412.0	15.2	33.1	1000.0	-966.9
Wi-fi/g(54Mbit/s)	2437.0	13.5	22.4	1000.0	-977.6
	2462.0	14.7	29.5	1000.0	-970.5
	2412.0	14.9	30.9	1000.0	-969.1
Wi-fi/n(6.5Mbit/s)	2437.0	13.3	21.3	1000.0	-978.7
	2462.0	14.3	26.9	1000.0	-973.1
	2412.0	14.9	30.9	1000.0	-969.1
Wi-fi/n(65Mbit/s)	2437.0	12.5	17.8	1000.0	-982.2
	2462.0	13.5	22.4	1000.0	-977.6

6.4 Test Results

Figure 33 Maximum Peak Power Output

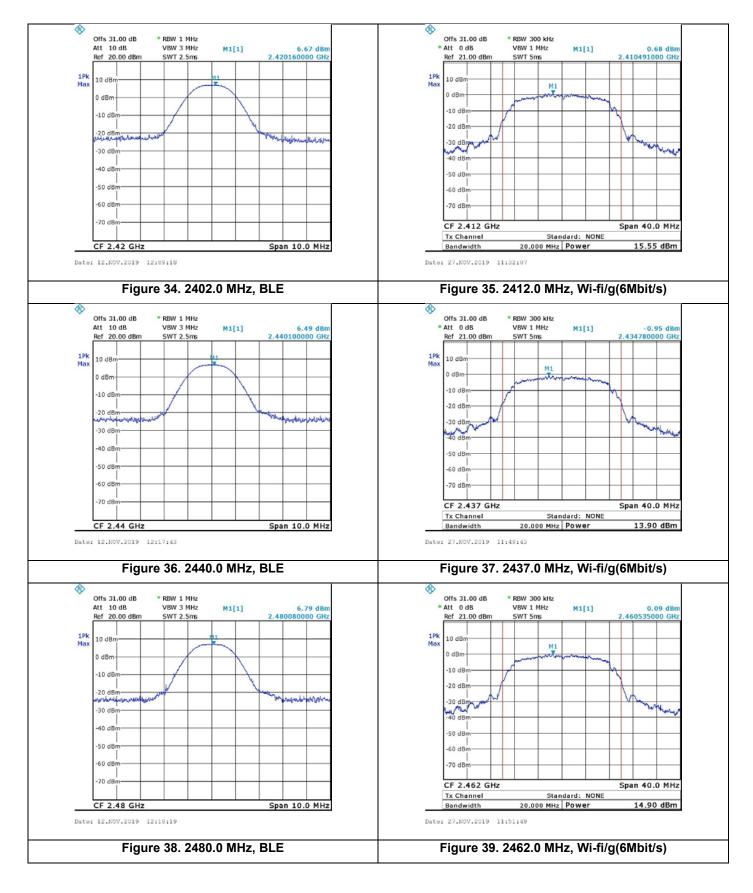
JUDGEMENT: Passed

Passed by 963.7 mW

For additional information see Figure 34 to Figure 48.

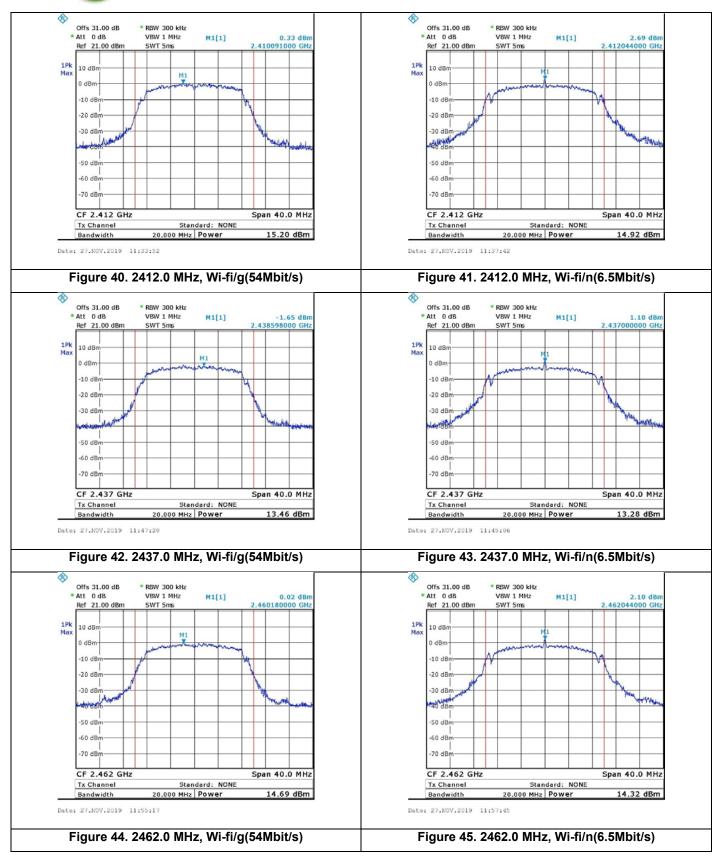
Orcam Technologies Ltd.

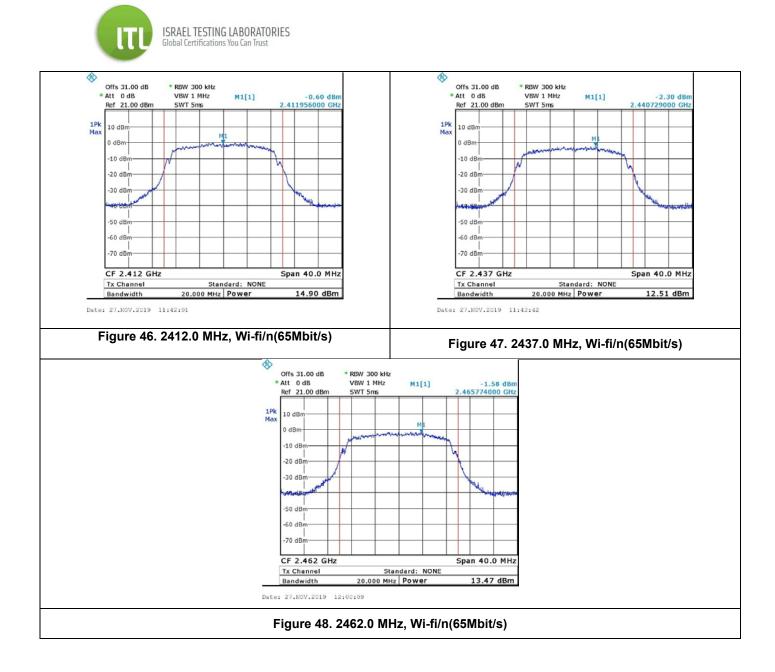






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6.5 Test Equipment Used; Maximum Peak Power Output

Instrument	Manufacturer	Model	Serial No.	Last Calibration Date	Next Calibration Due
Spectrum Analyzer	R&S	FSL6	100194	March 24, 2019	March 31, 2020
30dB Attenuator	MCL	BW-S30W5	533	December 24, 2018	December 31, 2019
RF Cable	Huber Suner	Sucofelex	27502/4PEA	December 24, 2018	December 31, 2019
RF Cable	EIM	705A009301 EIM	-	December 24, 2018	December 31, 2019

Figure 49 Test Equipment Used



7.1 Test Specification

FCC, Part 15, Subpart C, Section 247(d)

7.2 Test Procedure

(Temperature (20°C)/ Humidity (62%RH))

The E.U.T operation mode and test set-up are as described in Section 2 of this report.

The E.U.T. antenna terminal was connected to the Spectrum Analyzer through an external attenuator and an appropriate coaxial cable Special attention was taken to prevent Spectrum Analyzer RF input overload.

The RBW was set to 100 kHz.

7.3 Test Limit

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.



7.4 Test Results

Protocol Type	Operation Frequency	Band Edge Frequency	Spectrum Level	Limit	Margin
	(MHz)	(MHz)	(dBm)	(dBm)	(dB)
BLE	2402.0	2400.0	-38.0	-14.9	-23.1
	2480.0	2483.5	-38.9	-14.3	-24.6
Wi fi/g(6Mbit/s)	2412.0	2400.0	-23.7	-15.5	-8.2
Wi-fi/g(6Mbit/s)	2462.0	2483.5	-34.5	-16.4	-18.1
W: Fila(54Mbit/s)	2412.0	2400.0	-27.6	-17.0	-10.6
Wi-Fi/g(54Mbit/s)	2462.0	2483.5	-37.1	-18.5	-18.6
Wi Film(6 5Mbit/a)	2412.0	2400.0	-22.6	-17.2	-5.4
Wi-Fi/n(6.5Mbit/s)	2462.0	2483.5	-35.2	-16.9	-18.3
Wi-fi/n(65Mbit/s)	2412.0	2400.0	-29.5	-18.2	-11.3
	2462.0	2483.5	-44.1	-19.2	-24.9

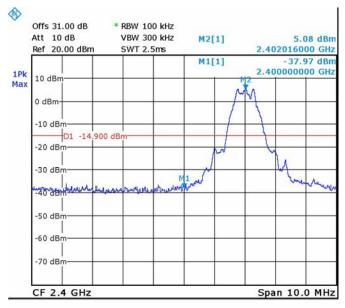
Figure 50 Band Edge Spectrum

JUDGEMENT:

Passed by 5.4 dB

For additional information see *Figure 51* and *Figure 60*.





Date: 12.NOV.2019 12:25:18

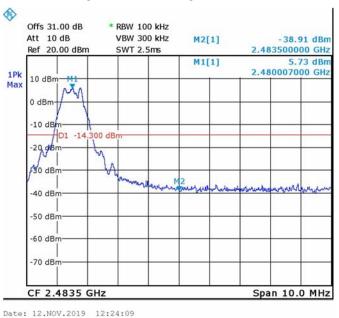
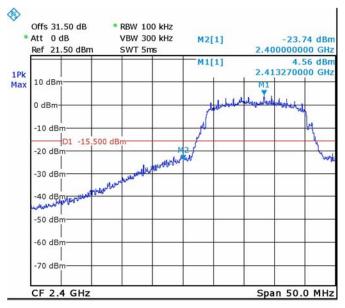


Figure 51 Band Edge Low, BLE

Figure 52 Band Edge High, BLE





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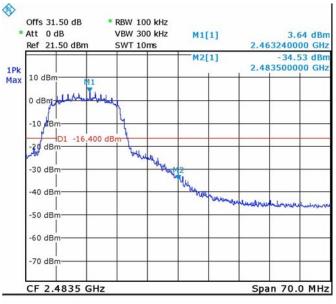
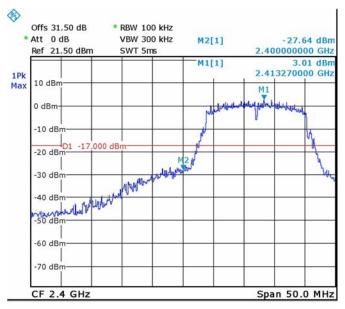


Figure 53 Band Edge Low, Wi-fi/g(6Mbit/s)

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Figure 54 Band Edge High, Wi-fi/g(6Mbit/s)





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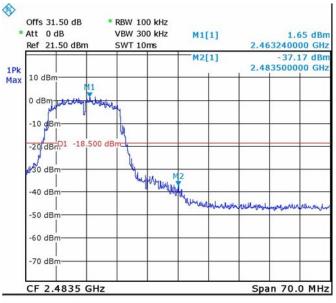
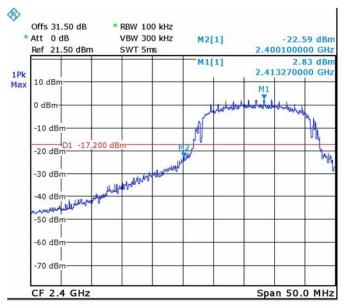


Figure 55 Band Edge Low, Wi-fi/g(54Mbit/s)

Date: 18.NOV.2019 07:22:42

Figure 56 Band Edge High, Wi-fi/g(54Mbit/s)





Date: 18.NOV.2019 06:45:05

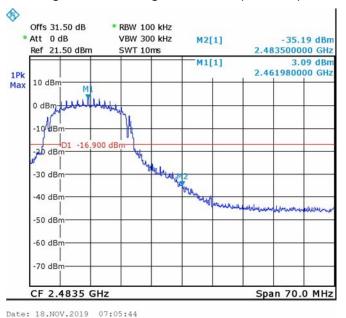
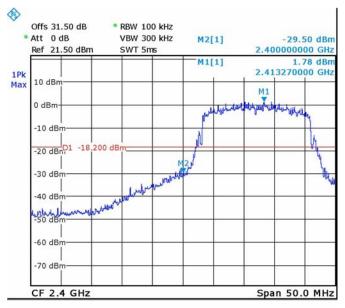


Figure 57 Band Edge Low, Wi-fi/n(6.5Mbit/s)

Figure 58 Band Edge High, Wi-fi/n(6.5Mbit/s)





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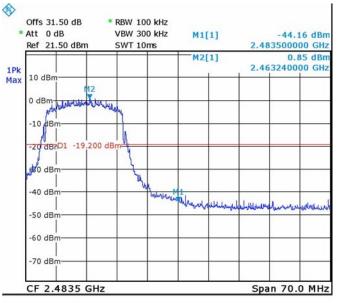


Figure 59 Band Edge Low, Wi-fi/n(65Mbit/s)

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Figure 60 Band Edge High, Wi-fi/n(65Mbit/s)



7.5 Test Equipment Used; Band Edge

Instrument	Manufacturer	Model	Serial No.	Last Calibration Date	Next Calibration Due
Spectrum Analyzer	R&S	FSL6	100194	March 24, 2019	March 31, 2020
30dB Attenuator	MCL	BW-S30W5	533	December 24, 2018	December 31, 2019
RF Cable	Huber Suner	Sucofelex	27502/4PEA	December 24, 2018	December 31, 2019
RF Cable	EIM	705A00930 1EIM	-	December 24, 2018	December 31, 2019

Figure 61 Test Equipment Used