

## FCC Test Report

**Report No.:** RFBDQY-WTW-P22040472-2

**FCC ID:** 2ACTO-APX320X

**Test Model:** APX 320X

**Received Date:** Apr. 13, 2022

**Test Date:** May 12 ~ May 13, 2022

**Issued Date:** Oct. 19, 2022

**Applicant:** Sophos Ltd

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**Issued By:** Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch  
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**FCC Registration / Designation Number:** 788550 / TW0003



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### Release Control Record

Issue No.	Description	Date Issued
RFBDQY-WTW-P22040472-2	Original release	Oct. 19, 2022

## 1 Certificate of Conformity

**Product:** Sophos Access Point

**Brand:** Sophos

**Test Model:** APX 320X

**Sample Status:** Engineering sample

**Applicant:** Sophos Ltd

**Test Date:** May 12 ~ May 13, 2022

**Standards:** 47 CFR FCC Part 15, Subpart C (Section 15.247)  
ANSI C63.10:2013

This report is issued as a supplementary report of RF191104C18. This report shall be used combined together with its original report.

**Prepared by :**                     *Polly Chien*                     , **Date:**                     Oct. 19, 2022                      
Polly Chien / Specialist

**Approved by :**                     *Jeremy Lin*                     , **Date:**                     Oct. 19, 2022                      
Jeremy Lin / Project Engineer

Note: Radiated emission below 1GHz and conducted emission are performed for the addendum. Refer to original report for the other test data.

## 2 Summary of Test Results

47 CFR FCC Part 15, Subpart C (Section 15.247)			
FCC Clause	Test Item	Result	Remarks
15.207	AC Power Conducted Emission	Pass	Meet the requirement of limit. Minimum passing margin is -2.00dB at 14.74212MHz
15.205 / 15.209 / 15.247(d)	Radiated Emissions and Band Edge Measurement	Pass	Meet the requirement of limit. Minimum passing margin is -1.8dB at 52.31MHz.
15.247(d)	Antenna Port Emission	N/A	Refer to Note 1
15.247(a)(2)	6dB bandwidth	N/A	Refer to Note 1
15.247(b)	Conducted power	N/A	Refer to Note 1
15.247(e)	Power Spectral Density	N/A	Refer to Note 1
15.203	Antenna Requirement	Pass	Antenna connector is IPEX connector not a standard connector.

Note:

1. Radiated emission below 1GHz and conducted emission are performed for the addendum. Refer to original report for the other test data.
2. Determining compliance based on the results of the compliance measurement, not taking into account measurement instrumentation uncertainty.

### 2.1 Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the EUT as specified in CISPR 16-4-2:

Measurement	Frequency	Expanded Uncertainty (k=2) ( $\pm$ )
Conducted Emissions at mains ports	150kHz ~ 30MHz	2.79 dB
Radiated Emissions up to 1 GHz	9kHz ~ 30MHz	3.04 dB
	30MHz ~ 200MHz	3.59 dB
	200MHz ~ 1000MHz	3.60 dB

### 2.2 Modification Record

There were no modifications required for compliance.

### 3 General Information

#### 3.1 General Description of EUT

Product	Sophos Access Point
Brand	Sophos
Test Model	APX 320X
Sample Status	Engineering sample
Power Supply Rating	55Vdc (PoE)
Modulation Type	GFSK
Transfer Rate	1Mbps
Operating Frequency	2402~2480MHz
Number of Channel	40
Channel Spacing	2MHz
Output Power	7.129mW
Antenna Type	PIFA antenna with 5.2dBi gain
Antenna Connector	IPEX
Accessory Device	NA
Cable Supplied	NA

Note:

1. This report is prepared for FCC class II permissive change. The difference compared with the original report no. RF191104C18 is removing TPM IC. Therefore, radiated emission below 1GHz and conducted emission are performed for the addendum. Refer to original report for the other test data.
2. The EUT uses the following PoE. (Support unit only)

Brand	Microsemi
Model	PD-9001GR/AC
Input Power	100-240Vac~50/60Hz, 0.67A
Output Power	55Vdc / 0.6A

3. Detail antenna specification please refer to antenna datasheet and/or antenna measurement report.

### 3.2 Description of Test Modes

40 channels are provided for EUT:

Channel	Freq. (MHz)	Channel	Freq. (MHz)	Channel	Freq. (MHz)	Channel	Freq. (MHz)
0	2402	10	2422	20	2442	30	2462
1	2404	11	2424	21	2444	31	2464
2	2406	12	2426	22	2446	32	2466
3	2408	13	2428	23	2448	33	2468
4	2410	14	2430	24	2450	34	2470
5	2412	15	2432	25	2452	35	2472
6	2414	16	2434	26	2454	36	2474
7	2416	17	2436	27	2456	37	2476
8	2418	18	2438	28	2458	38	2478
9	2420	19	2440	29	2460	39	2480

### 3.2.1 Test Mode Applicability and Tested Channel Detail

EUT Configure Mode	Applicable to		Description
	RE<1G	PLC	
-	√	√	-

Where RE $\geq$ 1G: Radiated Emission above 1GHz & Bandedge Measurement  
 RE<1G: Radiated Emission below 1GHz  
 PLC: Power Line Conducted Emission  
 APCM: Antenna Port Conducted Measurement

Note:

1. The EUT had been pre-tested on the positioned of each 3 axis. The worst case was found when positioned on **Z-plane**.
2. For radiated emission (below 1GHz) and power line conducted emission test items, the worst maximum power was selected.

#### Radiated Emission Test (Below 1GHz):

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations, data rates and antenna ports (if EUT with antenna diversity architecture).
- Following channel(s) was (were) selected for the final test as listed below.

EUT Configure Mode	Available Channel	Tested Channel	Modulation Technology	Data Rate (Mbps)	Remark
-	0 to 39	39	GFSK	1	-

#### Power Line Conducted Emission Test:

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations, data rates and antenna ports (if EUT with antenna diversity architecture).
- Following channel(s) was (were) selected for the final test as listed below.

EUT Configure Mode	Available Channel	Tested Channel	Modulation Technology	Data Rate (Mbps)	Remark
-	0 to 39	39	GFSK	1	-

#### Test Condition:

Applicable to	Environmental Conditions	Input Power (system)	Tested by
RE<1G	23deg. C, 68%RH	120Vac, 60Hz	Adair Peng
PLC	25deg. C, 75%RH	120Vac, 60Hz	Rex Wang



### 3.3 Description of Support Units

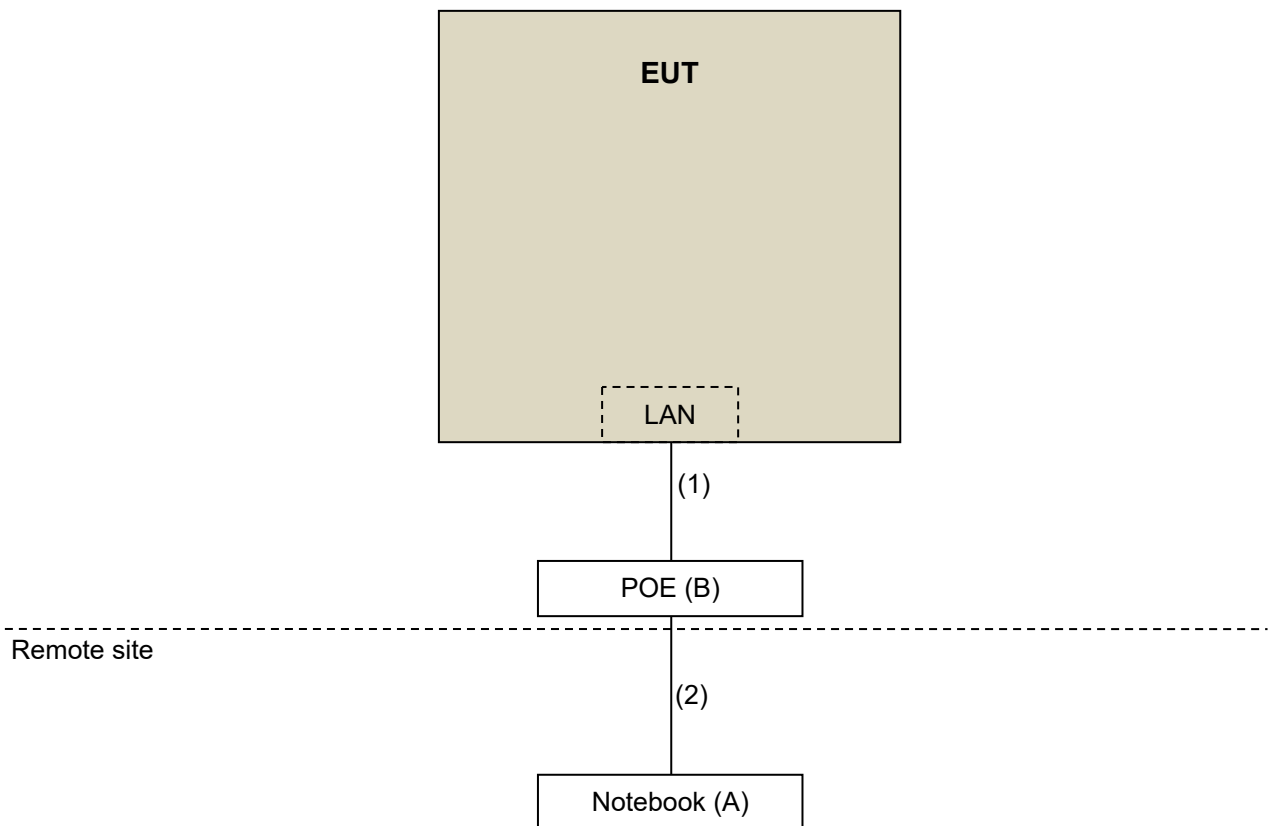
The EUT has been tested as an independent unit together with other necessary accessories or support units. The following support units or accessories were used to form a representative test configuration during the tests.

ID	Product	Brand	Model No.	Serial No.	FCC ID	Remarks
A.	Notebook	Lenovo	80Q7	PF0KUGU6	NA	-
B.	PoE	Microsemi	PD-9001GR/AC	NA	NA	-

Note: All power cords of the above support units are non-shielded (1.8m).

ID	Descriptions	Qty.	Length (m)	Shielding (Yes/No)	Cores (Qty.)	Remarks
1.	RJ45 cable	1	2	N	0	-
2.	RJ45 cable	1	10	N	0	-

#### 3.3.1 Configuration of System under Test



### **3.4 General Description of Applied Standards and References**

The EUT is a RF Product. According to the specifications of the manufacturer, it must comply with the requirements of the following standards and References:

**Test Standard:**

**FCC Part 15, Subpart C (15.247)**

ANSI C63.10:2013

All test items have been performed and recorded as per the above standards.

**References Test Guidance:**

**KDB 558074 D01 15.247 Meas Guidance v05r02**

All test items have been performed as a reference to the above KDB test guidance.

## 4 Test Types and Results

### 4.1 Radiated Emission and Bandedge Measurement

#### 4.1.1 Limits of Radiated Emission and Bandedge Measurement

Radiated emissions which fall in the restricted bands must comply with the radiated emission limits specified as below table. Other emissions shall be at least 20dB below the highest level of the desired power:

Frequencies (MHz)	Field Strength (microvolts/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

**Note:**

1. The lower limit shall apply at the transition frequencies.
2. Emission level (dBuV/m) = 20 log Emission level (uV/m).
3. For frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits, specified above by more than 20dB under any condition of modulation.

#### 4.1.2 Test Instruments

Description & Manufacturer	Model No.	Serial No.	Cal. Date	Cal. Due
Test Receiver KEYSIGHT	N9038A	MY55420137	Apr. 27, 2022	Apr. 26, 2023
Spectrum Analyzer ROHDE & SCHWARZ	FSP40	100039	Jun. 10, 2021	Jun. 09, 2022
BILOG Antenna SCHWARZBECK	VULB9168	9168-160	Oct. 28, 2021	Oct. 27, 2022
Loop Antenna TESEQ	HLA 6121	45745	Jul. 21, 2021	Jul. 20, 2022
Preamplifier Agilent (Below 1GHz)	8447D	2944A10638	Jun. 05, 2021	Jun. 04, 2022
RF signal cable Woken	8D-FB	Cable-CH9-01	Jun. 05, 2021	Jun. 04, 2022
Software BV ADT	ADT_Radiated_ V7.6.15.9.5	NA	NA	NA
Antenna Tower & Turn BV ADT	AT100	AT93021705	NA	NA
Turn Table BV ADT	TT100	TT93021705	NA	NA
Turn Table Controller BV ADT	SC100	SC93021705	NA	NA
Boresight Antenna Fixture	FBA-01	FBA-SIP01	NA	NA

- Note: 1. The calibration interval of the above test instruments is 12 months and the calibrations are traceable to NML/ROC and NIST/USA.  
 2. The test was performed in HwaYa Chamber 9.  
 3. Tested date: May 12, 2022

### 4.1.3 Test Procedures

#### For Radiated emission below 30MHz

- a. The EUT was placed on the top of a rotating table 0.8 meters above the ground at a 3 meter chamber room. The table was rotated 360 degrees to determine the position of the highest radiation.
- b. The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. Parallel, perpendicular, and ground-parallel orientations of the antenna are set to make the measurement.
- d. For each suspected emission, the EUT was arranged to its worst case and the rotatable table was turned from 0 degrees to 360 degrees to find the maximum reading.
- e. The test-receiver system was set to Quasi-Peak Detect Function and Specified Bandwidth with Maximum Hold Mode.

Note:

1. The resolution bandwidth and video bandwidth of test receiver/spectrum analyzer is 9kHz at frequency below 30MHz.

#### For Radiated emission above 30MHz

- a. The EUT was placed on the top of a rotating table 0.8 meters above the ground at 3 meter chamber room for test. The table was rotated 360 degrees to determine the position of the highest radiation.
- b. The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. The height of antenna is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are set to make the measurement.
- d. For each suspected emission, the EUT was arranged to its worst case and then the antenna was tuned to heights from 1 meter to 4 meters and the rotatable table was turned from 0 degrees to 360 degrees to find the maximum reading.
- e. The test-receiver system was set to quasi-peak detect function and specified bandwidth with maximum hold mode when the test frequency is below 1 GHz.

Note:

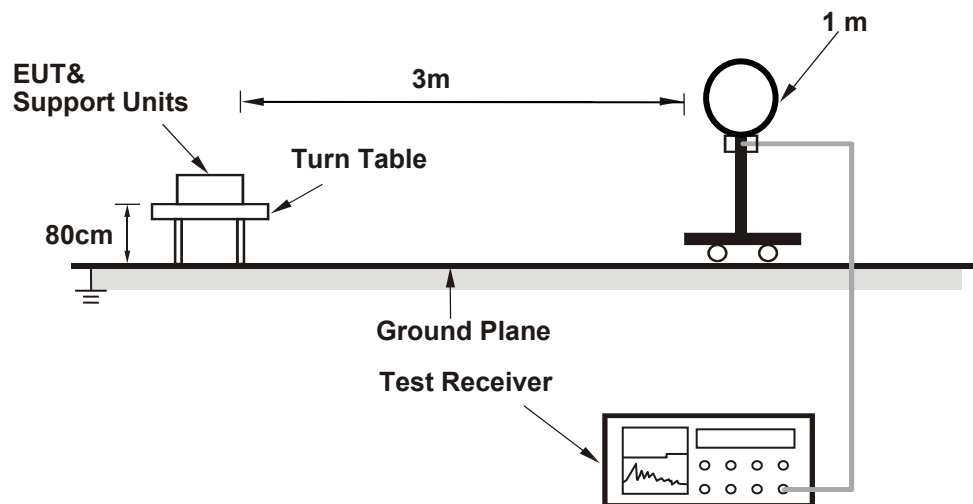
1. The resolution bandwidth and video bandwidth of test receiver/spectrum analyzer is 120kHz for Quasi-peak detection (QP) at frequency below 1GHz.
2. All modes of operation were investigated and the worst-case emissions are reported.

### 4.1.4 Deviation from Test Standard

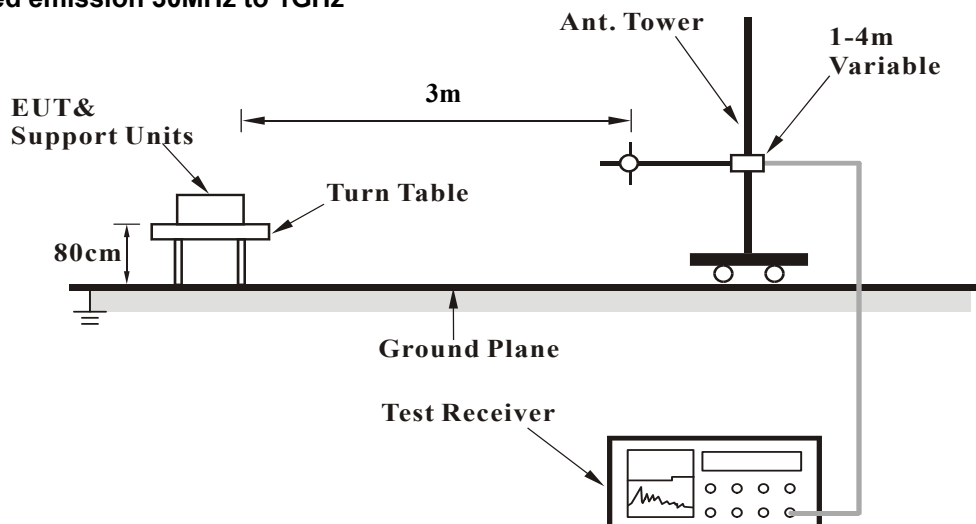
No deviation.

#### 4.1.5 Test Setup

##### For Radiated emission below 30MHz



##### For Radiated emission 30MHz to 1GHz



For the actual test configuration, please refer to the attached file (Test Setup Photo).

#### 4.1.6 EUT Operating Conditions

- Placed the EUT on the testing table.
- Prepared a notebook to act as a communication partner and placed it outside of testing area.
- The communication partner connected with EUT via a RJ45 cable and ran a test program (QRCT) to enable EUT under transmission condition continuously at specific channel frequency.
- The communication partner sent data to EUT by command "PING".

#### 4.1.7 Test Results

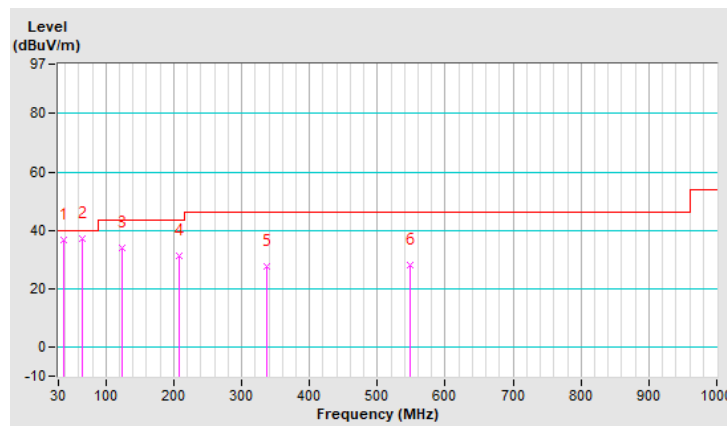
Below 1GHz worst-case data:

FREQUENCY RANGE	9kHz ~ 1GHz	DETECTOR FUNCTION	Quasi-Peak (QP)
CHANNEL	TX Channel 39		

ANTENNA POLARITY & TEST DISTANCE: HORIZONTAL AT 3 M								
NO.	FREQ. (MHz)	EMISSION LEVEL (dBuV/m)	LIMIT (dBuV/m)	MARGIN (dB)	ANTENNA HEIGHT (m)	TABLE ANGLE (Degree)	RAW VALUE (dBuV)	CORRECTION FACTOR (dB/m)
1	37.76	36.8 QP	40.0	-3.2	1.00 H	178	46.5	-9.7
2	65.89	37.2 QP	40.0	-2.8	2.00 H	84	47.8	-10.6
3	123.12	33.8 QP	43.5	-9.7	1.00 H	222	44.8	-11.0
4	207.51	31.3 QP	43.5	-12.2	1.00 H	59	42.7	-11.4
5	337.49	27.6 QP	46.0	-18.4	1.50 H	236	33.7	-6.1
6	547.98	28.3 QP	46.0	-17.7	2.00 H	239	29.9	-1.6

Remarks:

1. Emission Level(dBuV/m) = Raw Value(dBuV) + Correction Factor(dB/m)
2. Correction Factor(dB/m) = Antenna Factor(dB/m) + Cable Factor(dB) – Pre-Amplifier Factor(dB)
3. The other emission levels were very low against the limit of frequency range 30MHz~1000MHz.
4. Margin value = Emission Level – Limit value
5. The emission levels were very low against the limit of frequency range 9kHz~30MHz: the amplitude of spurious emissions attenuated more than 20dB below the permissible value to be report.

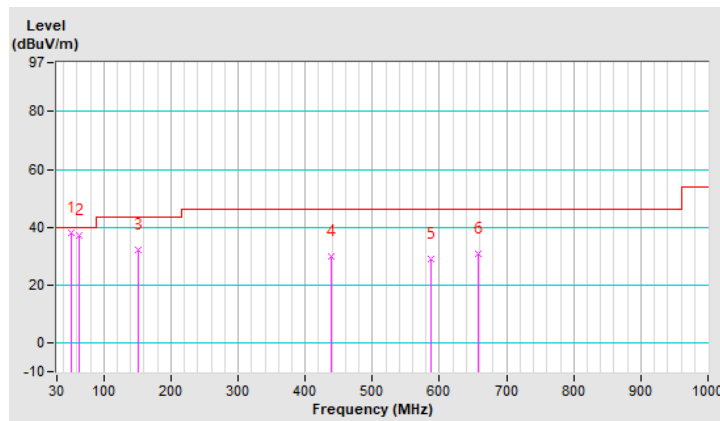


FREQUENCY RANGE	9kHz ~ 1GHz	DETECTOR FUNCTION	Quasi-Peak (QP)
CHANNEL	TX Channel 39		

ANTENNA POLARITY & TEST DISTANCE: VERTICAL AT 3 M								
NO.	FREQ. (MHz)	EMISSION LEVEL (dBuV/m)	LIMIT (dBuV/m)	MARGIN (dB)	ANTENNA HEIGHT (m)	TABLE ANGLE (Degree)	RAW VALUE (dBuV)	CORRECTION FACTOR (dB/m)
1	52.31	38.2 QP	40.0	-1.8	1.50 V	185	47.2	-9.0
2	63.95	37.2 QP	40.0	-2.8	1.00 V	133	47.2	-10.0
3	152.22	32.0 QP	43.5	-11.5	1.00 V	330	40.9	-8.9
4	438.37	29.8 QP	46.0	-16.2	1.00 V	63	33.4	-3.6
5	586.78	28.9 QP	46.0	-17.1	2.00 V	71	29.6	-0.7
6	658.56	30.7 QP	46.0	-15.3	1.00 V	5	30.4	0.3

Remarks:

1. Emission Level(dBuV/m) = Raw Value(dBuV) + Correction Factor(dB/m)
2. Correction Factor(dB/m) = Antenna Factor(dB/m) + Cable Factor(dB) – Pre-Amplifier Factor(dB)
3. The other emission levels were very low against the limit of frequency range 30MHz~1000MHz.
4. Margin value = Emission Level – Limit value
5. The emission levels were very low against the limit of frequency range 9kHz~30MHz: the amplitude of spurious emissions attenuated more than 20dB below the permissible value to be report.





## 4.2 Conducted Emission Measurement

### 4.2.1 Limits of Conducted Emission Measurement

Frequency (MHz)	Conducted Limit (dBuV)	
	Quasi-peak	Average
0.15 - 0.5	66 - 56	56 - 46
0.50 - 5.0	56	46
5.0 - 30.0	60	50

- Note: 1. The lower limit shall apply at the transition frequencies.  
 2. The limit decreases in line with the logarithm of the frequency in the range of 0.15 to 0.50MHz.

### 4.2.2 Test Instruments

Description & Manufacturer	Model No.	Serial No.	Cal. Date	Cal. Due
Test Receiver ROHDE & SCHWARZ	ESCI	100613	Dec. 03, 2021	Dec. 02, 2022
RF signal cable (with 10dB PAD) Woken	5D-FB	Cable-cond1-01	Jan. 15, 2022	Jan. 14, 2023
LISN ROHDE & SCHWARZ (EUT)	ENV216	101826	Mar. 14, 2022	Mar. 13, 2023
LISN ROHDE & SCHWARZ (Peripheral)	ESH3-Z5	100311	Sep. 07, 2021	Sep. 06, 2022
Software ADT	BV ADT_Cond_ V7.3.7.4	NA	NA	NA

- Note: 1. The calibration interval of the above test instruments is 12 months and the calibrations are traceable to NML/ROC and NIST/USA.  
 2. The test was performed in HwaYa Shielded Room 1 (Conduction 1).  
 3. The VCCI Site Registration No. is C-12040.  
 4. Test Date: May 13, 2022

#### 4.2.3 Test Procedures

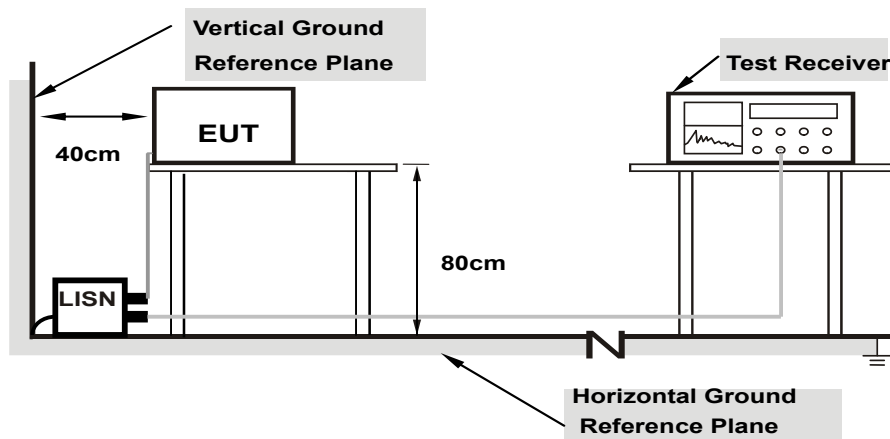
- The EUT was placed 0.4 meters from the conducting wall of the shielded room with EUT being connected to the power mains through a line impedance stabilization network (LISN). Other support units were connected to the power mains through another LISN. The two LISNs provide 50 ohm/ 50uH of coupling impedance for the measuring instrument.
- Both lines of the power mains connected to the EUT were checked for maximum conducted interference.
- The frequency range from 150kHz to 30MHz was searched. Emission levels under (Limit - 20dB) was not recorded.

Note: The resolution bandwidth and video bandwidth of test receiver is 9kHz for quasi-peak detection (QP) and average detection (AV) at frequency 0.15MHz-30MHz.

#### 4.2.4 Deviation from Test Standard

No deviation.

#### 4.2.5 Test Setup



**Note: 1.Support units were connected to second LISN.**

For the actual test configuration, please refer to the attached file (Test Setup Photo).

#### 4.2.6 EUT Operating Conditions

Same as item 4.1.6.

#### 4.2.7 Test Results

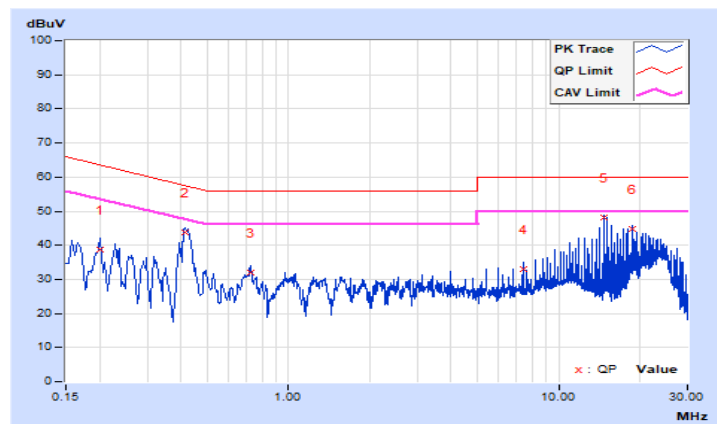
Worst-case data:

Phase	Line (L)	Detector Function	Quasi-Peak (QP) / Average (AV)
Channel	TX Channel 39		

No	Freq. [MHz]	Corr. Factor (dB)	Reading Value [dB (uV)]		Emission Level [dB (uV)]		Limit [dB (uV)]		Margin (dB)	
			Q.P.	AV.	Q.P.	AV.	Q.P.	AV.	Q.P.	AV.
			1	0.20083	9.64	29.22	19.55	38.86	29.19	63.58
2	0.41197	9.69	33.92	22.71	43.61	32.40	57.61	47.61	-14.00	-15.21
3	0.72084	9.70	22.13	15.32	31.83	25.02	56.00	46.00	-24.17	-20.98
4	7.37177	9.78	23.25	21.93	33.03	31.71	60.00	50.00	-26.97	-18.29
<b>5</b>	<b>14.74212</b>	<b>9.84</b>	<b>38.27</b>	<b>38.16</b>	<b>48.11</b>	<b>48.00</b>	<b>60.00</b>	<b>50.00</b>	<b>-11.89</b>	<b>-2.00</b>
6	18.71077	9.86	35.03	34.58	44.89	44.44	60.00	50.00	-15.11	-5.56

Remarks:

1. Q.P. and AV. are abbreviations of quasi-peak and average individually.
2. The emission levels of other frequencies were very low against the limit.
3. Margin value = Emission level - Limit value
4. Correction factor = Insertion loss + Cable loss
5. Emission Level = Correction Factor + Reading Value.

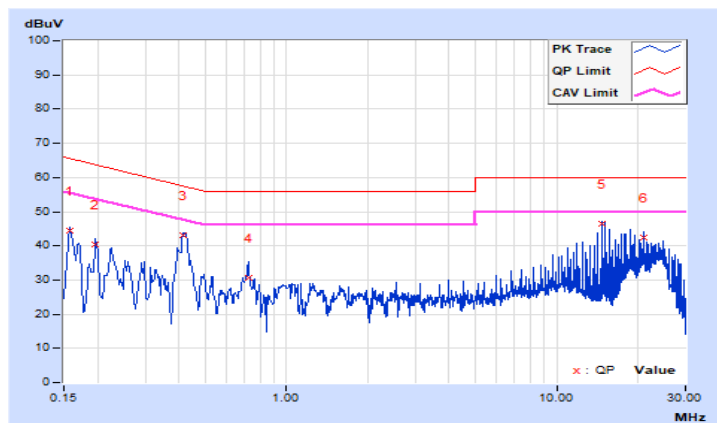


Phase	Neutral (N)	Detector Function	Quasi-Peak (QP) / Average (AV)
Channel	TX Channel 39		

No	Freq. [MHz]	Corr. Factor (dB)	Reading Value [dB (uV)]		Emission Level [dB (uV)]		Limit [dB (uV)]		Margin (dB)	
			Q.P.	AV.	Q.P.	AV.	Q.P.	AV.	Q.P.	AV.
			1	0.15782	9.62	34.68	22.85	44.30	32.47	65.58
2	0.19692	9.64	30.91	23.10	40.55	32.74	63.74	53.74	-23.19	-21.00
3	0.41560	9.69	33.36	24.61	43.05	34.30	57.54	47.54	-14.49	-13.24
4	0.72084	9.70	21.09	14.40	30.79	24.10	56.00	46.00	-25.21	-21.90
5	14.74212	9.86	36.68	36.58	46.54	46.44	60.00	50.00	-13.46	-3.56
6	20.97857	9.89	32.37	31.24	42.26	41.13	60.00	50.00	-17.74	-8.87

Remarks:

1. Q.P. and AV. are abbreviations of quasi-peak and average individually.
2. The emission levels of other frequencies were very low against the limit.
3. Margin value = Emission level - Limit value
4. Correction factor = Insertion loss + Cable loss
5. Emission Level = Correction Factor + Reading Value.



## 5 Pictures of Test Arrangements

Please refer to the attached file (Test Setup Photo).

## Appendix – Information of the Testing Laboratories

We, Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch, were founded in 1988 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are FCC recognized accredited test firms and accredited and approved according to ISO/IEC 17025.

If you have any comments, please feel free to contact us at the following:

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The address and road map of all our labs can be found in our web site also.

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