Attestation   Statements
(Processing Gain)
of the Wireless LAN PC card (P/N: 26P8030)

The Wireless LAN PC card used in the applying product(ThinkPad A22) is an OEM card supplied by Agere Systems (renamed from Lucent Technologies).

-The original card name of Agere is "PC24-H-FC", FCC ID : IMRWLPC24H.
-The Official card name in IBM is "IBM Internal High Rate Wireless LAN PC card".

Both products are functionally, electrically, and mechanically identical.   Only antenna is replaced with IBM's inverted F antenna from the original card of Agere Systems.

Based on this back ground, Agere Systems guarantees the Processing Gain measured for "PC24-H-FC" covers the " IBM Internal High Rate Wireless LAN PC card".
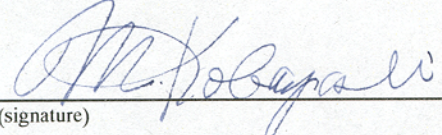Please refer to the next two pages.

To whom this may concern

Re: OEM Acknowledgement

IBM Japan, Ltd., 1623-14, Shimotsuruma, Yamato-shi, Kanagawa-ken, 242-8502, Japan, and
Agere Systems Nederland B.V. in Nieuwegein, The Netherlands,
hereby acknowledge that IBM Japan will change the (Lucent) model PC24-H-FC only with
regard to labels and identification and will sell the product under its own company name IBM
Internal High Rate Wireless LAN PC Card.

Both products are functionally, electrically and mechanically identical

IBM Japan, Ltd.

_____
(signature)

Masaki Kobayashi / Portable Products
(name/function)

March 12 /2001
(date)

Agere Systems Nederland B.V.

_____
(signature)

C. VAN VELZEN, MGR QA
(name/function)

16 Mar 2001
(date)

To whom this may concern

Nieuwegein, 19 March 2001

Re: Processing Gain Orinoco (WaveLAN) Cards

We hereby confirm that the report files 015127 cover the following products:
- PC Card Extended, e.g. Lucent identification PC24E-H-FC
- PC Card Integrated, e.g. Lucent identification PC24-H-FC
- MiniPCI, e.g. Lucent identification MPCI3A-20.

Sincerely yours,

Bert Vos, Certifications Support

Encl.

cc:

Lucent Technologies
Bell Labs Innovations

Nederland B.V.

Zadelstede 1-10
3431 JZ Nieuwegein
The Netherlands
Phone: +31 30 6097666
Fax: +31 30 6097556

FCC...

Nieuwegein, 19 March 2001

Re: Processing Gain Orinoco (WaveLAN) PC Cards and MiniPCI

- For Chip/symbol rate etc. see the table below:

Bit rate	Chip/symbol rate	Bit/symbol rate	Chip/bit rate
1 Mbit/sec	11	1, DBPSK	11
2 Mbit/sec	11	2, DQPSK	5.5
5.5 Mbit/sec	8	4, CCK	2
11 Mbit/sec	8	8, CCK	1

Sincerely yours,

Bert Vos, Certifications Support,
Email: bvos@lucent.com

Encl.

cc:

12 July 1999

Zadelstede 1-10
3431 JZ Nieuwegein
The Netherlands
Phone: +31 30 6097666
Fax: +31 30 6097556

To whom this may concern

FCC ID: <u>IMRWLPCE24H</u>

Re: <u>Questions on processing gain</u>, EA94181 Corr. Ref. Number 8361

1.   For 1 and 2 Mbp/s DQPSK modulation using a fixed spreading sequence the symbol rate is 1 MSymbol/s. The symbol length is 11 chips. Each chip duration is 1/11 uS. A symbol duration is 1 uS.

The chip/symbol rate is 11.

The theoretical process gain is $10*LOG(11) = 10$ dB.

2.   For 5.5 and 11 Mbp/s CCK where the spreading sequence is a function of the transmitted data, the symbol rate is 8/11 MSymbol/s. The symbol length is 8 chips. Each chip duration is 1/11 uS. A symbol duration is 8/11 uS.

The chip/symbol rate is 8.

The theoretical process gain is $10*LOG(8) = 9$ dB. Due to the fact that only 256 code sequences out of the 65536 code sequences that are available are used, there is coding gain. Therefore the processing gain of a CCK system consists of spreading gain and coding gain together. As such a CCK system does meet the FCC requirement for a process gain of minimal 10 dB.

See below our reply that we've sent to the FCC last time for the previous certification, this answer

Explanation:

The Lucent High Speed modulation is compliant to draft standard extension IEEE 802.11b for 5.5 and 11 MBit/s signaling rates. For this modulation technique the Symbol length is 8 Chips (1 Symbol duration equals 8/11 uS). However, the 8 Chips are not a fixed spreading sequence as is the case for the 1 and 2 MBit/s modulation technique. These 8 Chips, applied in a QPSK modulation, use 256 unique patterns out of the 65536 different possible patterns, whereby each pattern represents a specific data sequence (4 or 8 bits). Thus this type of modulation introduces Coding Gain, since only 256 patterns are used out of 65536 possible combinations.

Therefore it can be concluded that the system employs Coding Gain in addition to Spreading Gain.

The Processing Gain of the system is taken as the combined result of Coding and Spreading Gain, so a Processing Gain of 10 dB can be met with 8 Chips per Symbol.

Lucent has shown by a CW jammer margin test, that a SIR of 10 dB can be met, while meeting the system specified BER. It is our understanding that this is compliant with the FCC ruling.

Therefore the Revision B test report shows that the Lucent product, operating at 1, 2, 5.5 and 11 Mbit/s meets a Processing Gain of at least 10 dB, under the conditions as specified by the FCC.

TEST REPORT

Subject: Processing Gain For the ORiNOCO IEEE802.11b products

Ref.:   FCC Rules 47 CFR Part 15, Section 5.247d

Report Prepared by:

Maarten Visee	_____	July 28, 2000
Name	Signature	Date

Concurrence:

1. Director of Engineering

Bruce Tuch	_____	August 10, 2000
Name	Signature	Date

2. Team Captain

Frans Hoekstra	_____	August 10, 2000
Name	Signature	Date

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0   Change History:

Date	Section	Description
07/28/00, Rev. A		Initial release.

FCC Processing Gain Measurements Results,
Report No. 015127, Rev. A.

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1 . Summary:

This document describes the Receiver Processing Gain verification measurements performed at the Lucent Technologies ORiNOCO IEEE802.11b products according to Ref.[2] and Ref.[5].

2 . Conclusion:

The Lucent Technologies ORiNOCO Mini PCI product conforms to the minimum required 10 dB processing gain, as set forth by the FCC for operation in the 2.4 GHz ISM band.

3 . References:

1- Document FCC 97-114, Appendix C, Guidance on Measurements for Direct Sequence Spread Spectrum Systems.
2- Hardware Functional Specification for WaveLAN-II Embedded, High Speed, Doc. No. 011735, Rev. A, Source Organization Lucent Technologies WCND Utrecht.
3- Viterbi, A. J., Principles of Coherent Communications, New York, McGraw-Hill 1966.
4- Proakis, J.G., Digital Communications, New York, McGraw-Hill 1989, page 270.
5- Hardware Functional Specification for the Lucent Technologies ORiNOCO Mini PCI, Doc. No. 015143, Source Organization Lucent Technologies WCND Utrecht.

4 . Measurement description:

4.1 Test introduction - FCC requirements:

Part of FCC certification for Lucent Technologies ORiNOCO IEEE802.11b High Speed compliant Network Interface Cards (NIC) is a processing gain test. This test proves that the receiver of the tested product employs a true spread spectrum device receiver structure, taking full advantage of the direct sequence spread spectrum modulation technique.

This test verifies the receiver processing gain to be 10 dB or more for a data rate of 1, 2, 5.5 and 11 Mbit/s, by monitoring the Bit Error Rate (BER) of the product under test for each data rate, while operating under strict defined received signal conditions.

Several methods of showing compliance to the rules are possible, from a stepped CW jammer to a continuous sweeping CW interferer. For this test the discrete stepped CW jammer method was chosen, as described in Ref.[1].

Therefore a receiver input signal is applied to the product under test, in the presence of a Continuous Wave (CW) interference source, also referred to as CW jammer.

The test takes place at the product Functional Specification (Ref.[2], Ref.[5]) specified conditions for BER rate measurements, specifying a BER equal or better than 10^{-8} at a receiver input level of -55 dBm. For practical reasons these test are performed at -55 dBm or -53 dBm. This small deviation from the Functional Specification should not cause any deviation from the specified Bit Error Rate, since the received levels are well above the thermal noise.

The test criteria for meeting the minimal processing gain is such that it takes the theoretical calculated SNR for the applied modulation technique and specified BER as a reference. From this given SNR the processing gain is subtracted, yielding the CW Jammer to Signal ratio J/S. From Ref. [4], likewise as Ref.[3] consulted in Ref. [1], it is determined that for a BER of 10^{-8} the SNR $(S/N)_o$ equals:

    13 dB @ 1 Mbit/s,
    15 dB @ 2 Mbit/s,
    15 dB @ 5.5 Mbit/s,
    18 dB @ 11 Mbit/s.

Thus the J/S ratio for a processing gain of 10 dB that must be met is calculated as:

    -13 + 10 = -3 dB @ 1 Mbit/s (DBPSK),

    -15 + 10 = -5 dB @ 2 Mbit/s (DQPSK),

    -15 + 10 = -5 dB @ 5.5 Mbit/s (CCK),

    -18 + 10 = -8 dB @ 11 Mbit/s (CCK).

Two types of measurement corrections are allowed for as described in Ref.[1]. The first taking into account 2 dB implementation losses, thus increasing the absolute J/S ratio by 2 dB.

The second correction allows for deleting the 20% worst-case frequencies in the processing gain test that causes the test at that CW interference to fail. This implies that for the considered 14 MHz wide measurement interval the worst case 57 CW jammer frequencies can be ignored, being those that result in received data errors/missing frames (20% of 14 MHz *(1 MHz/50 KHz) + 1 = (20% * 281) + 1 = 57).

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4.2 Test sequence:

The measurements are performed at a 50 KHz CW jammer raster. For each CW jammer frequency 10^8 bits are transmitted by the reference transmitter, and received by the product under test. For practical reasons 50.000 messages are transmitted. After blanking out frame overhead 1927 bits per frame are monitored. This results in 50.000 * 1927 = 9650000 transmitted bits for a BER test, which is a mere 1.4% less than the targeted 10^8 bits. Though it would be more elegant to show BER compliance for at least say ten times 10^8 transmitted/received bits, the time involved with this grows significantly. Since the CW interferer is stepped in a 50 KHz raster, covering the receiver bandwidth of 14 MHz, it is considered that the BER requirement is sufficiently met since such a multitude of measurements are taken.

The total measurement is being performed under computer control, hereafter referred to as controller. It involves the control over the reference transmitter, CW-interference generator, receiver under test and received data error-checker/frame counter. The controller is programmed by a configuration file, that lists the CW jammer frequencies and CW jammer signal levels. The controller program flow chart is given in Annex A, WaveLAN-II FCC Processing Gain Measurements, Controller Flow Chart.

The transmitted data pattern is fixed, and known at the receiver. Therefore the error checker compares the known transmitted data sequence with received data sequence. Received data errors and missing received frames information is retrieved by the controller.

In the receiver at the inter-connection between the received data demodulator output at the DSP and the digital interface the demodulated received RF signal is made available to an error checker. This error checker is a dedicated piece of hardware that monitors real-time the received data, gating-out any other non-relevant information that is present in the received data (message header, message length field, CRC field, diagnostic information field etc.). For a chosen Tx message length of 230 bytes this yields 1927 useable bits.

The test sequence is as follows: the controller issues a request to the transmitter for 1000 frames to be transmitted. Once this number of frames has been transmitted the transmitter signals to the controller the completion of this. The controller reads the number of received frames and number of erroneous received frames. If there are no missing frames or received data errors detected, the controller increases the CW interference level by 1 dB. Consequently it re-issues a 1000 frames transmit request, and the test is re-started. This

sequence is repeated until received data errors or missing
frames are detected.

Now instead of a quick error scan using 1000 frames, 50000 frames (equals 10^8 bits) are transmitted to verify the BER. For this test the CW jammer level is lowered 1 dB, compared to the CW jammer level at which the first receive data errors and/or missing frames were detected. All the measurement results are recorded for later use.

After completion of the 50000 frames BER test, the spreading gain verification test continues by raising the CW jammer frequency by 50 KHz and re-setting the CW jammer level to the start value, taken from the controller configuration file. For this new CW frequency the measurements are repeated as described above (see Annex A).

All CW frequencies and power levels are listed in a command-file that is read by the controller at start up.

Before measurements are started, the receiver input level and CW jammer level need to be calibrated. See figure 1 for the test set-up.

The test takes place at an arbitrarily chosen channel, being channel two (2417 MHz).

4.3 Receiver level calibration:

The receiver input level is calibrated using the RF power meter. For this purpose, the reference transmitter output attenuator is set to 0 dB. The CW jammer is disabled during the calibration. Using the RF power meter at the receiver input of the device under test, the received level at the receiver input is measured for a continuos active reference transmitter. The attenuator value is calculated to achieve a received level of -55 dBm. Finally the attenuator is adjusted to this value.

4.4 CW level calibration:

The reference transmitter is disabled during this calibration. The CW jammer generator output level is set to 0 dBm, and the RF power meter value is read. The difference in CW output level setting and RF power meter measured at receiver input of the device under test is the attenuation of the test set-up. This is the correction factor that needs to be applied for analysis of the measurements results.

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5   .   Equipment used:

# Item needed	Description
1	Portable PC with WaveLAN-II NIC, Zenith Z-lite, SN-3GSAZW000061, for receiver.
1	Portable PC with WaveLAN-II NIC, NCR 3150, SN 17-26106224, for transmitter.
1	Software 'Testware, V5.09', Rev. 0, <TW.EXE>, 141456 bytes, 12-13-1998. Used for the transmitter and receiver.
2	WaveLAN Turbo NIC IEEE802.11b ORiNOCO Mini PCI card IEEE802.11b
1	PC + IEEE interface card, NCR PC6, SN 17-17039925 and CEC PC<>488 interface card.
1	Received error checker, wire-wrap prototype, Lucent WCND designed and built.
1	Power supply, Delta D030-1, for error checker.
1	Spectrum Analyzer, HP 9592B SN 3009U00102.
1	Power Meter, Rohde & Schwarz, Millivolt meter URV5, SN 893430/070.
1	Power Sensor, Rhode & Schwarz, type NRV-Z2 828218.02, SN 860925/005.
1	CW jammer generator, Gigatronics 7200, SN 746604.
1	Variable attenuator, 0-70 dB, Midwest Microwave, Model 1044.
2	Fixed attenuator, 10 dB, Inmet Corp., model 18AH-10.
1	RF power splitter, ARRA 3-9200-2, SN 2001.
1	Misc. IEEE cabling.
1	Misc. SMA cabling.
1	RF shielded cage.

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6 . Measurement set_up:

The test setup is given below in Figure 1, measurement test set-up. To avoid interference that can disrupt the measurement, the whole test is performed within a RF shielded cage.

Figure 1, measurement test set-up.

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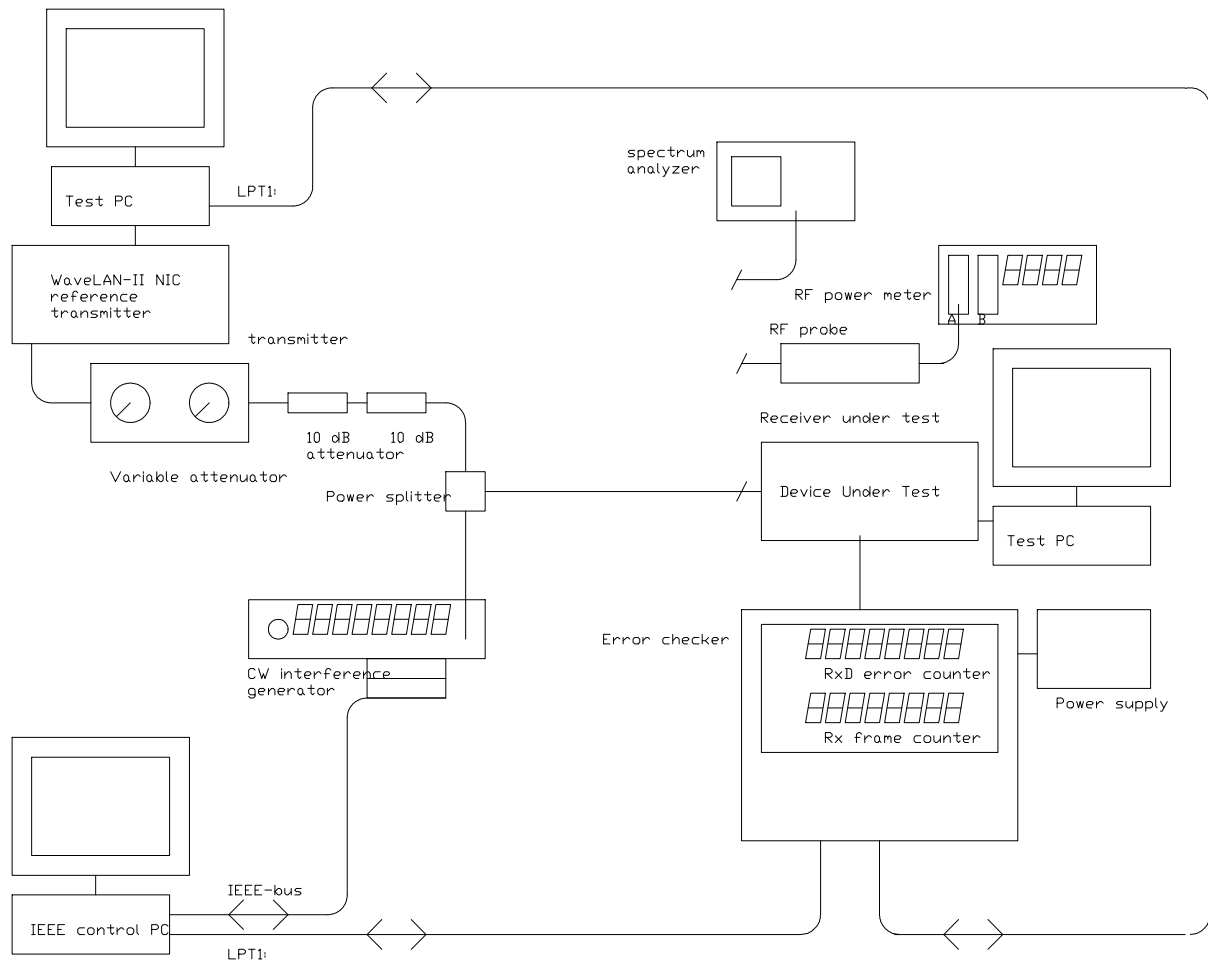
7   .   Measurement results:

7.1 Calibrations:

Receiver calibration 1, 2, 5.5 and 11 Mbit/s: For 0 dB total attenuator setting the received level at the receiver input equals +10 dBm.
Test setting: the fixed attenuator is chosen to be 20 dB, the variable attenuator is set to 45, respectively 43 dB attenuation.

CW jammer generator calibration: For a 0 dBm output level at the generator the received level at the receiver input is -6 dBm.

7.2 Processing Gain Measurement Results:

For each CW jammer frequency between Fc +/-7 MHz, being the receiver bandwidth, a BER measurement is taken.
For each CW measurement frequency the jammer level is varied from -66 dBm to -58 dBm a the receiver input, yielding a J/S ratio of -11 to -3 dB, respectively -13 to -5 dB.
For some CW frequencies received data errors/missing frames are detected while performing the BER test.

Applying the allowed margin of 2 dB implementation losses for 1 Mbit/s, a 1 dB implementation loss for 5.5 and 11 Mbit/s, and no implementation loss for 2 Mbit/s, together with the rule of discarding the 20% worst-case jamming/signal points (Ref.[1]), results in meeting the specified BER for which less than 20% of the measured CW interference frequencies were found to cause received data errors and/or missing frames.
These percentage numbers are respectively 16% @ 1 Mbit/s, 3% @ 2 Mbit/s, 17% @ 5.5 Mbit/s and 18% @ 11 Mbit/s.
Therefore, a J/S ratio better or equal to -5 dB @ 1 Mbit/s, -5 dB @ 2 Mbit/s, -7 dB @ 5.5 Mbit/s and -9 dB @ 11 Mbit/s is measured.

7.3 Measurement Conclusion:

The tested product complies to the required Processing Gain of 10 dB for a data rate of 1, 2, 5.5 and 11 Mbit/s, as set forth in Ref.[1].

Annex A: Flow-Chart IEEE control program

```
                    ( START )
                         |
        +----------------------------------+
        | Initialize IEEE card.            |
        | Set name for:                    |
        | -Input file <input.cmd>          |
        | -Output result file              |
        |   <measres.txt>.                 |
        +----------------------------------+
                         |
        +----------------------------------+
        | Write to <measres.txt>           |
        |  date, time                      |
        | Input file name <input.cmd>,     |
        | Output file name is              |
        | <measres.txt>.                   |
        +----------------------------------+
                         |
        +----------------------------------+
        | Read line from <input.cmd>       |
        +----------------------------------+
                         |
                    / input <> "" /  ---No--->  END
                         |
                        Yes
                         |
        +----------------------------------+
        | Fill array (meas(I,J) )          |
        |  from <input.cmd>.               |
        | Set CW frequency                 |
        +----------------------------------+
                         |
        +----------------------------------+
        | For I=1 to 9                     |
        +----------------------------------+
                         |
        +----------------------------------+
        | Set CW output level              |
        | CW level := MEAS(I,1)            |
        +----------------------------------+
                         |
        +----------------------------------+
        | Reset counters                   |
        | Start Tx                         |
        +----------------------------------+
                         |
        +----------------------------------+
        | Wait for Tx to finish            |
        +----------------------------------+
                         |
        +----------------------------------+
        | Read counter values              |
        +----------------------------------+
                         |
                    / Count = 0 /  ---No--->  / I = 1 /  ---No--->
                         |                        |
                        Yes                      Yes
                         |                        |
                    / I = 9 /        +----------------------------------+
                  No    |            | Set CW output level              |
                       Yes          | CW level := MEAS(I,1)            |
                                     +----------------------------------+

                              +----------------------------------+
                              | Set CW output level              |
                              | CW level := MEAS((I-1),1)        |
                              +----------------------------------+

        +----------------------------------+
        | Reset counters                   |
        | Start Tx                         |
        +----------------------------------+
                         |
        +----------------------------------+
        | Wait for Tx to finish            |
        +----------------------------------+
                         |
        +----------------------------------+
        | Read counter value               |
        | Write to file <measres.txt>:     |
        | -CW  frequency                   |
        | -CW interference level           |
        | -#measured errors                |
        | -Start time, stop time           |
        +----------------------------------+
```