

Electromagnetic Emissions Test Report and Request for Class II Permissive Change pursuant to FCC Part 15, Subpart C Specifications for an Intentional Radiator on the OTC Telecom Inc. Model: AirEZY 2462-TRX

> FCC ID: MKZAZY2462TRX

GRANTEE: OTC Telecom Inc.

> 602 Charcot Ave. San Jose, CA. 95131

TEST SITE: Elliott Laboratories, Inc.

> 684 W. Maude Avenue Sunnyvale, CA 94086

> > Paved W Bare

REPORT DATE: June 13, 2000

FINAL TEST DATE: May 26 and June 2, 2000

AUTHORIZED SIGNATORY:

David W. Bare Principal Engineer

TABLE OF CONTENTS

COVER PAGE	1
TABLE OF CONTENTS	2
SCOPE	4
OBJECTIVE	4
STATEMENT OF COMPLIANCE	4
EMISSION TEST RESULTS	5
LIMITS OF CONDUCTED INTERFERENCE VOLTAGE	5
LIMITS OF ANTENNA CONDUCTED POWER	
LIMITS OF RADIATED INTERFERENCE FIELD STRENGTH	
LIMITS OF BANDWIDTH	
MEASUREMENT UNCERTAINTIES	
EQUIPMENT UNDER TEST (EUT) DETAILS	7
GENERAL	7
ENCLOSURE	7
MODIFICATIONS	
SUPPORT EQUIPMENT	
EUT INTERFACE PORTS	
TEST SOFTWARE	
PROPOSED MODIFICATION DETAILS	9
GENERAL	9
CHANNELS	
TEST SITE	10
GENERAL INFORMATION	10
CONDUCTED EMISSIONS CONSIDERATIONS	
RADIATED EMISSIONS CONSIDERATIONS	10
MEASUREMENT INSTRUMENTATION	11
RECEIVER SYSTEM	11
INSTRUMENT CONTROL COMPUTER	11
LINE IMPEDANCE STABILIZATION NETWORK (LISN)	11
POWER METER	
FILTERS/ATTENUATORS	
ANTENNAS MACETANIS FOLUEN ENTERIOR DE LA CONTRA DA F	
ANTENNA MAST AND EQUIPMENT TURNTABLEINSTRUMENT CALIBRATION	
TEST PROCEDURES	-
EUT AND CABLE PLACEMENT	
CONDUCTED EMISSIONS	
CONDUCTED EMISSIONS FROM ANTENNA PORT	
RADIATED EMISSIONS	
SPECIFICATION LIMITS AND SAMPLE CALCULATIONS	15
CONDUCTED EMISSIONS SPECIFICATION LIMITS, SECTION 15.207	15
RADIATED EMISSIONS SPECIFICATION LIMITS, SECTION 15.209	
SAMPLE CALCULATIONS - CONDUCTED EMISSIONS	
SAMPLE CALCULATIONS - RADIATED EMISSIONS	17

TABLE OF CONTENTS (Continued)

EXHIBIT 1:	Test Data Log Sheets	S		
EXHIBIT 2: Rad	diated Emissions Test (Configuration	Photographs	

File: R37959 Page 3 of 17 pages

SCOPE

An electromagnetic emissions test has been performed on the OTC Telecom, Inc. model AirEZY 2462-TRX pursuant to Subpart C of Part 15 of FCC Rules for intentional radiators. Conducted and radiated emissions data has been collected, reduced, and analyzed within this report in accordance with measurement guidelines set forth in ANSI C63.4-1992 as outlined in Elliott Laboratories test procedures.

The intentional radiator above has been tested in a simulated typical installation to demonstrate compliance with the relevant FCC performance and procedural standards.

Final system data was gathered in a mode that tended to maximize emissions by varying orientation of EUT, orientation of power and I/O cabling, antenna search height, and antenna polarization.

Every practical effort was made to perform an impartial test using appropriate test equipment of known calibration. All pertinent factors have been applied to reach the determination of compliance.

The test results recorded herein are based on a single type test of the OTC Telecom, Inc. model AirEZY 2462-TRX and therefore apply only to the tested sample. The sample was selected and prepared by Ray Negronof OTC Telecom Inc.

OBJECTIVE

The primary objective of the manufacturer is compliance with Subpart C of Part 15 of FCC Rules for the radiated and conducted emissions of intentional radiators. Certification of these devices is required as a prerequisite to marketing as defined in Part 2 the FCC Rules.

Certification is a procedure where the manufacturer or a contracted laboratory makes measurements and submits the test data and technical information to the FCC. The FCC issues a grant of equipment authorization upon successful completion of their review of the submitted documents. Once the equipment authorization has been obtained, the label indicating compliance must be attached to all identical units subsequently manufactured.

STATEMENT OF COMPLIANCE

The tested sample of OTC Telecom, Inc. model AirEZY 2462-TRX complied with the requirements of Subpart C of Part 15 of the FCC Rules for low power intentional radiators.

Maintenance of FCC compliance is the responsibility of the manufacturer. Any modification of the product which may result in increased emissions should be checked to ensure compliance has been maintained (i.e., printed circuit board layout changes, different line filter, different power supply, harnessing or I/O cable changes, etc.).

File: R37959 Page 4 of 17 pages

EMISSION TEST RESULTS

The following emissions tests were performed on the OTC Telecom, Inc. model AirEZY 2462-TRX. Only these tests were performed for the addition of the 2412 MHz channel. The actual test results are contained in an exhibit of this report.

LIMITS OF CONDUCTED INTERFERENCE VOLTAGE

The EUT was not tested for AC mains conducted emissions.

LIMITS OF ANTENNA CONDUCTED POWER

The EUT tested complied with the limits detailed in FCC Rules Part 15 Section 15.247.

The maximum power output was 17 dBm at 2412 MHz. The maximum power spectral density was 0 dBm at 2412 MHz. The actual test data and any correction factors are contained in an exhibit of this report.

LIMITS OF RADIATED INTERFERENCE FIELD STRENGTH

The EUT tested complied with the limits detailed in FCC Rules Part 15 Section 15.247 and 15.209 in the case of emissions falling within the frequency bands specified in Section 15.205.

The following measurement was extracted from the data recorded during the radiated electric field emissions scan and represents the highest amplitude emission relative to the specification limit. The actual test data and any correction factors are contained in an exhibit of this report.

Frequency	Level	Pol	FCC 1	5.209	Detector	Azimuth	Height	Comments
MHz	dBuV/m	v/h	Limit	Margin	Pk/QP/Avg	degrees	meters	
4824.047	50.4	h	54.0	-3.6	Avg	350	1.0	

LIMITS OF BANDWIDTH

The EUT tested complied with the limits detailed in FCC Rules Part 15 Section 15.247.

The minimum 6 dB bandwidth was 8.73 Megahertz at 2412 MHz. The actual test data and any correction factors are contained in an exhibit of this report.

File: R37959 Page 5 of 17 pages

MEASUREMENT UNCERTAINTIES

ISO Guide 25 requires that an estimate of the measurement uncertainties associated with the emissions test results be included in the report. The measurement uncertainties given below are based on a 95% confidence level and were calculated in accordance with NAMAS document NIS 81.

Measurement Type	Frequency Range (MHz)	Calculated Uncertainty (dB)
Conducted Emissions	0.15 to 30	± 2.4
Radiated Emissions	30 to 1000	± 3.2

File: R37959 Page 6 of 17 pages

EQUIPMENT UNDER TEST (EUT) DETAILS

GENERAL

The OTC Telecom, Inc. model AirEZY 2462-TRX is a wire less ethernet transceiver which is designed to transmit data. Normally, the EUT would be placed on a table top during operation. The EUT was, therefore, placed in this position during emissions testing to simulate the end user environment. The electrical rating of the EUT is 120/60 Hz.

The sample was received on May 26, 2000 and tested on May 26 and June 2, 2000. The EUT consisted of the following component(s):

Manufacturer	Model	Description	Serial Number	FCC ID
OTC Telecom	AirEZY 2462-TRX	Wireless ethernet transceiver	2W10502470	MKZAZY2462TRX
		transcerver		

ENCLOSURE

The EUT enclosure is primarily constructed of fabricated sheet steel. It measures approximately 10cm wide by 16 cm deep by 0.4 cm high.

MODIFICATIONS

The EUT did not require modifications during testing in order to comply with the emission specifications.

SUPPORT EQUIPMENT

The following equipment was used as local support equipment for emissions testing:

Manufacturer	Model	Description	Serial Number	FCC ID
HP	Pavilion	Computer	None	None
Gateway	EV500	Monitor	15009A804758	BEJCS592
HP	M-S34	Mouse	LZB82407215	DZL211029
Gateway	E06350US001-C	Keyboard	J8293M2815	None
OTC Telecom	None	Omni directional antenna	None	None
OTC Telecom	None	Parabolic antenna	None	None

No remote support equipment was used during emissions testing.

File: R37959 Page 7 of 17 pages

EUT INTERFACE PORTS

The I/O cabling configuration during emissions testing was as follows:

			Cable(s)	
EUT Port Connected To		Description	Shielded or	Length(m)
			Unshielded	
Ethernet output	PC ethernet input	Ethernet Port	Unshielded	2m
BSMA input	IS-MT10LN output, IS-	Antenna cable	Shielded	10m
	MT50LN input to polyphase			
	output to receiver antenna			

TEST SOFTWARE

Transmitting 2M/bit data to antenna.

File: R37959 Page 8 of 17 pages

PROPOSED MODIFICATION DETAILS

GENERAL

This section details the modifications to the OTC Telecom Inc. model AirEZY 2462-TRX being proposed. All performance and construction deviations from the characteristics originally reported to the FCC are addressed

CHANNELS

The original AirEZY2462-TRX operated from 2422 to 2462 MHz. The radio has been changed to allow operation at 2412 MHz as well.

File: R37959 Page 9 of 17 pages

TEST SITE

GENERAL INFORMATION

Final test measurements were taken on May 26 and June 2, 2000 at the Elliott Laboratories Open Area Test Site #2 located at 684 West Maude Avenue, Sunnyvale, California. The test site contains separate areas for radiated and conducted emissions testing. Pursuant to section 2.948 of the Rules, construction, calibration, and equipment data has been filed with the Commission.

The FCC recommends that ambient noise at the test site be at least 6 dB below the allowable limits. Ambient levels are below this requirement with the exception of predictable local TV, radio, and mobile communications traffic. The test site contains separate areas for radiated and conducted emissions testing. Considerable engineering effort has been expended to ensure that the facilities conform to all pertinent FCC requirements.

CONDUCTED EMISSIONS CONSIDERATIONS

Conducted emissions testing is performed in conformance with ANSI C63.4-1992. Measurements are made with the EUT connected to the public power network through a nominal standardized RF impedance, provided by a line impedance stabilization network, known as a LISN. A LISN is inserted in series with each current-carrying conductor in the EUT power cord.

RADIATED EMISSIONS CONSIDERATIONS

The FCC has determined that radiation measurements made in a shielded enclosure are not suitable for determining levels of radiated emissions. Radiated measurements are performed in an open field environment. The test site is maintained free of conductive objects within the CISPR defined elliptical area incorporated in ANSI C63.4 guidelines.

File: R37959 Page 10 of 17 pages

MEASUREMENT INSTRUMENTATION

RECEIVER SYSTEM

An EMI receiver as specified in CISPR 16-1 is used for emissions measurements. The receivers used can measure over the frequency range of 9 kHz up to 2000 MHz. These receivers allow both ease of measurement and high accuracy to be achieved. The receivers have Peak, Average, and CISPR (Quasi-peak) detectors built into their design so no external adapters are necessary. The receiver automatically sets the required bandwidth for the CISPR detector used during measurements.

For measurements above the frequency range of the receivers, a spectrum analyzer is utilized because it provides visibility of the entire spectrum along with the precision and versatility required to support engineering analysis. Average measurements above 1000MHz are performed on the spectrum analyzer using the linear-average method with a resolution bandwidth of 1 MHz and a video bandwidth of 10 Hz.

INSTRUMENT CONTROL COMPUTER

The receivers utilize either a Rohde and Schwarz EZM Spectrum Monitor/Controller or contain an internal Spectrum Monitor/Controller to view and convert the receiver measurements to the field strength at an antenna or voltage developed at the LISN measurement port, which is then compared directly with the appropriate specification limit. This provides faster, more accurate readings by performing the conversions described under Sample Calculations within the Test Procedures section of this report. Results are printed in a graphic and/or tabular format, as appropriate. A personal computer is used to record all measurements made with the receivers.

The Spectrum Monitor provides a visual display of the signal being measured. In addition, the controller or a personal computer run automated data collection programs which control the receivers. This provides added accuracy since all site correction factors, such as cable loss and antenna factors are added automatically.

LINE IMPEDANCE STABILIZATION NETWORK (LISN)

Line conducted measurements utilize a fifty microhenry Line Impedance Stabilization Network as the monitoring point. The LISN used also contains a 250 uH CISPR adapter. This network provides for calibrated radio frequency noise measurements by the design of the internal low pass and high pass filters on the EUT and measurement ports, respectively.

File: R37959 Page 11 of 17 pages

POWER METER

A power meter and thermister mount are used for all direct output power measurements from transmitters as they provide a broadband indication of the power output.

FILTERS/ATTENUATORS

External filters and precision attenuators are often connected between the receiving antenna or LISN and the receiver. This eliminates saturation effects and non-linear operation due to high amplitude transient events.

ANTENNAS

A biconical antenna is used to cover the range from 30 MHz to 300 MHz and a log periodic antenna is utilized from 300 MHz to 1000 MHz. Narrowband tuned dipole antennas are used over the entire 30 to 1000 MHz range for precision measurements of field strength. Above 1000 MHz, a horn antenna is used. The antenna calibration factors are included in site factors, which are programmed into the test receivers.

ANTENNA MAST AND FOUIPMENT TURNTABLE

The antennas used to measure the radiated electric field strength are mounted on a non-conductive antenna mast equipped with a motor-drive to vary the antenna height.

ANSI C63.4 specifies that the test height above ground for table mounted devices shall be 80 centimeters. Floor mounted equipment shall be placed on the ground plane if the device is normally used on a conductive floor or separated from the ground plane by insulating material from 3 to 12 mm if the device is normally used on a non-conductive floor. During radiated measurements, the EUT is positioned on a motorized turntable in conformance with this requirement.

INSTRUMENT CALIBRATION

All test equipment is regularly checked to ensure that performance is maintained in accordance with the manufacturer's specifications. All antennas are calibrated at regular intervals with respect to tuned half-wave dipoles. An exhibit of this report contains the list of test equipment used and calibration information.

File: R37959 Page 12 of 17 pages

TEST PROCEDURES

EUT AND CABLE PLACEMENT

The FCC requires that interconnecting cables be connected to the available ports of the unit and that the placement of the unit and the attached cables simulate the worst case orientation that can be expected from a typical installation, so far as practicable. To this end, the position of the unit and associated cabling is varied within the guidelines of ANSI C63.4, and the worst case orientation is used for final measurements.

CONDUCTED EMISSIONS

Conducted emissions are measured at the plug end of the power cord supplied with the EUT. Excess power cord length is wrapped in a bundle between 30 and 40 centimeters in length near the center of the cord. Preliminary measurements are made to determine the highest amplitude emission relative to the specification limit for all the modes of operation. Placement of system components and varying of cable positions are performed in each mode. A final peak mode scan is then performed in the position and mode for which the highest emission was noted on all current carrying conductors of the power cord.

CONDUCTED EMISSIONS FROM ANTENNA PORT

Direct measurements are performed with the antenna port of the EUT connected to either the power meter or spectrum analyzer via a suitable attenuator and/or filter. These are used to ensure that the front end of the measurement instrument is not overloaded by the fundamental transmission.

File: R37959 Page 13 of 17 pages

RADIATED EMISSIONS

Radiated emissions measurements are performed in two phases as well. A preliminary scan of emissions is conducted in which all significant EUT frequencies are identified with the system in a nominal configuration. At least two scans are performed from 30 MHz up to the frequency required by the regulation specified on page 1. One or more of these is with the antenna polarized vertically while the one or more of these are with the antenna polarized horizontally. During the preliminary scans, the EUT is rotated through 360°, the antenna height is varied and cable positions are varied to determine the highest emission relative to the limit.

A speaker is provided in the receiver to aid in discriminating between EUT and ambient emissions. Other methods used during the preliminary scan for EUT emissions involve scanning with near field magnetic loops, monitoring I/O cables with RF current clamps, and cycling power to the EUT.

Final maximization is a phase in which the highest amplitude emissions identified in the spectral search are viewed while the EUT azimuth angle is varied from 0 to 360 degrees relative to the receiving antenna. The azimuth which results in the highest emission is then maintained while varying the antenna height from one to four meters. The result is the identification of the highest amplitude for each of the highest peaks. Each recorded level is corrected in the receiver using appropriate factors for cables, connectors, antennas, and preamplifier gain. Emissions which have values close to the specification limit may also be measured with a tuned dipole antenna to determine compliance.

File: R37959 Page 14 of 17 pages

SPECIFICATION LIMITS AND SAMPLE CALCULATIONS

The limits for conducted emissions are given in units of microvolts, and the limits for radiated emissions are given in units of microvolts per meter at a specified test distance. Data is measured in the logarithmic form of decibels relative to one microvolt, or dB microvolts (dBuV). For radiated emissions, the measured data is converted to the field strength at the antenna in dB microvolts per meter (dBuV/m). The results are then converted to the linear forms of uV and uV/m for comparison to published specifications.

For reference, converting the specification limits from linear to decibel form is accomplished by taking the base ten logarithm, then multiplying by 20. These limits in both linear and logarithmic form are as follows:

CONDUCTED EMISSIONS SPECIFICATION LIMITS, SECTION 15.207

Frequency Range (MHz)	Limit (uV)	Limit (dBuV)
0.450 to 30.000	250	48

RADIATED EMISSIONS SPECIFICATION LIMITS, SECTION 15.209

Frequency Range (MHz)	Limit (uV/m @ 3m)	Limit (dBuV/m @ 3m)
0.009-0.490	2400/F _{KHz} @ 300m	$67.6-20*\log_{10}(F_{KHz})$ @ 300m
0.490-1.705	24000/F _{KHz} @ 30m	87.6-20*log ₁₀ (F _{KHz}) @ 30m
1.705 to 30	30 @ 30m	29.5 @ 30m
30 to 88	100	40
88 to 216	150	43.5
216 to 960	200	46.0
Above 960	500	54.0

File: R37959 Page 15 of 17 pages

SAMPLE CALCULATIONS - CONDUCTED EMISSIONS

Receiver readings are compared directly to the conducted emissions specification limit (decibel form) as follows:

$$R_r - B = C$$

and

$$C - S = M$$

where:

 R_r = Receiver Reading in dBuV

B = Broadband Correction Factor*

C = Corrected Reading in dBuV

S = Specification Limit in dBuV

M = Margin to Specification in +/- dB

* Broadband Level- Per ANSI C63.4, 13 dB may be subtracted from the quasi-peak level if it is determined that the emission is broadband in nature. If the signal level in the average mode is six dB or more below the signal level in the peak mode, the emission is classified as broadband.

File: R37959 Page 16 of 17 pages

SAMPLE CALCULATIONS - RADIATED EMISSIONS

Receiver readings are compared directly to the specification limit (decibel form). The receiver internally corrects for cable loss, preamplifier gain, and antenna factor. The calculations are in the reverse direction of the actual signal flow, thus cable loss is added and the amplifier gain is subtracted. The Antenna Factor converts the voltage at the antenna coaxial connector to the field strength at the antenna elements. A distance factor, when used for electric field measurements, is calculated by using the following formula:

$$F_d = 20*LOG_{10} (D_m/D_s)$$

where:

 F_d = Distance Factor in dB

 $D_m = Measurement Distance in meters$

 D_S = Specification Distance in meters

Measurement Distance is the distance at which the measurements were taken and Specification Distance is the distance at which the specification limits are based. The antenna factor converts the voltage at the antenna coaxial connector to the field strength at the antenna elements.

The margin of a given emission peak relative to the limit is calculated as follows:

$$R_c = R_r + F_d$$

and

$$M = R_C - L_S$$

where:

 R_r = Receiver Reading in dBuV/m

 F_d = Distance Factor in dB

 R_C = Corrected Reading in dBuV/m

 L_S = Specification Limit in dBuV/m

M = Margin in dB Relative to Spec

File: R37959 Page 17 of 17 pages

EXHIBIT 1:Test Data Log Sheets

ELECTROMAGNETIC EMISSIONS

TEST LOG SHEETS

AND

MEASUREMENT DATA

T37750 17 Pages

File: R37959 Appendix Page 1 of 3

EXHIBIT 2: Radiated Emissions Test Configuration Photographs



File: R37959 Appendix Page 2 of 3

APPENDIX 2: Radiated Emissions Test Configuration Photographs



File: R37959 Appendix Page 3 of 3