

ELECTROMAGNETIC EMISSIONS COMPLIANCE REPORT

Applicant: Seiko Epson Corporation
6925 Tazawa, Toyoshina, Azumino-shi, Nagano, 399-8285 Japan

Product Name: Intelligent Controller

Brand Name: EPSON

Model No.: BO-IC400

Model Difference: N/A

Report Number: E2/2020/50086

FCC ID: SKSBO-IC400

FCC Rule Part: §15.407, Cat: NII

Issue Date: Jul. 10, 2020

Date of Test: May 29, 2020 ~ Jul. 03, 2020

Date of EUT Received: May 29, 2020

We hereby certify that:

The above equipment was tested by SGS Taiwan Ltd. Central RF Lab. The test data, data evaluation, test procedures, and equipment configurations shown in this report were made in accordance with the procedures given in ANSI C63.10: 2013 and the energy emitted by the sample EUT tested as described in this report is in compliance with conducted and radiated emission limits.

The test results of this report relate only to the tested sample identified in this report.

Approved By: _____

Jazz Huang

Jazz Huang / Asst. Supervisor



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Revision History

| Report Number | Revision | Description | Issue Date | Remark |
|---------------|----------|-------------|---------------|-----------------------|
| E2/2020/50086 | Rev.00 | Original. | Jul. 10, 2020 | Revised By: Yuri Tsai |

Note:

1、Disclaimer

Antenna information is provided by the applicant, test results of this report are applicable to the sample EUT received.

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1 GENERAL INFORMATION

1.1 Product Description

| | | |
|-------------------|---|---|
| Product Name: | Intelligent Controller | |
| Brand Name: | EPSON | |
| Model No.: | BO-IC400 | |
| Model Difference: | N/A | |
| Hardware Version: | DVT | |
| Software Version: | Android 9 | |
| Power Supply: | 3.85Vdc from Rechargeable Li-ion Battery or 5Vdc from Micro USB port | |
| | Battery: | Battery: |
| Modulation type | 64QAM, 16QAM, QPSK, BPSK for OFDM 256QAM for OFDM in 802.11ac only | |
| Transition Rate | 802.11 a: 6/9/12/18/24/36/48/54 Mbps 802.11 n_20MHz: 6.5 – 144.4Mbps 802.11 n_40MHz: 13.5 – 300.0Mbps | 802.11 ac_20MHz: 6.5 – 173.3Mbps 802.11 ac_40MHz: 13.5 – 400.0Mbps 802.11 ac_80MHz: 29.3 – 866.7Mbps 802.11 ac_160MHz: 58.5 – 1733.4Mbps |

1.2 Antenna Designation

| Antenna Type | Supplier | Antenna Part No. | Freq. (MHz) | Peak Antenna Gain (dBi) | Worst Antenna Gain |
|--------------|----------|------------------|-------------|-------------------------|--------------------|
| PIFA | PEGATRON | K1606-00028F1BS1 | 5150~5250 | 1.7 (Main) | |
| | | | 5250~5350 | 2 (Main) | |
| | | | 5470~5725 | 1.9 (Main) | |
| | | | 5725~5850 | 0.8 (Main) | |
| | | K1606-00029E1BS1 | 5150~5250 | 3.3 (Aux) | V |
| | | | 5250~5350 | 3.3 (Aux) | V |
| | | | 5470~5725 | 3.5 (Aux) | V |
| | | | 5725~5850 | 1.8 (Aux) | V |

Note: Pre-scanned was done on the above 2 antennas, the Aux antenna results higher emission at 5GHz. Therefore, the completed set of measurement was done on the antenna to be presented on this test report.

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1.3 FCC worst power

| Wi-Fi 802.11 | Frequency Range | Channels | Rated Power (Avg.) (dBm) (Worst case) | | Modulation Technology |
|-----------------------|--------------------|----------|--|-------|--------------------------|
| a | 5180~5240 | 4 | 15.84 | | OFDM |
| | 5260~5320 | 4 | 15.73 | | |
| | 5500~5700 | 12 | 15.9 | | |
| | 5745-5825 | 5 | 15.88 | | |
| n_HT ac_VHT 20M | 5180~5240 | 4 | HT | 15.41 | OFDM |
| | 5260~5320 | 4 | HT | 15.37 | |
| | 5500~5700 | 12 | HT | 15.39 | |
| | 5745-5825 | 5 | HT | 15.42 | |
| n_HT ac_VHT 40M | 5190~5230 | 2 | HT | 15.47 | OFDM |
| | 5270~5310 | 2 | HT | 15.47 | |
| | 5510~5670 | 5 | HT | 15.33 | |
| | 5755-5795 | 2 | HT | 15.23 | |
| ac_VHT 80M | 5210 | 1 | HT | 15.23 | OFDM |
| | 5290 | 1 | HT | 15.35 | |
| | 5530~5610 | 2 | HT | 15.79 | |
| | 5775 | 1 | HT | 15.60 | |

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1.4 Test Methodology of Applied Standards

FCC Part 15, Subpart E §15.407

FCC KDB 905462 D02 UNII DFS Compliance Procedures New Rules v02

FCC KDB 905462 D03 UNII Clients Without Radar Detection New Rules v01r02

1.5 Test Facility

SGS Taiwan Ltd. Central RF Lab (TAF code 3702)

No.2, Keji 1st Rd., Guishan District, Taoyuan City, Taiwan 333

FCC Designation number: TW0028

1.6 Special Accessories

There are no special accessories used while test was conducted.

1.7 Equipment Modifications

There was no modification incorporated into the EUT.

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2 SUMMARY OF TEST RESULT

| FCC / IC Rules | IC Rules | Description Of Test | Result |
|----------------|-------------------------|-------------------------|-----------|
| §15.407(h) | IC RSS-247 issue 1 §6.3 | TPC and DFS Measurement | Compliant |

3 MEASUREMENT UNCERTAINTY

| Test Items | Uncertainty |
|-------------------------|-----------------------------|
| TPC and DFS Measurement | +/- 123.36 Hz |
| Temperature | +/- 0.65 °C |
| Humidity | +/- 4.6 % |
| DC / AC Power Source | DC= +/- 0.13%, AC= +/- 0.2% |

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

The conformity assessment statement in this report is based solely on the test results, measurement uncertainty is excluded.

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4 TPC AND DFS MEASUREMENT

4.1 TPC: Standard Applicable

According to §15.407(h)(1), Transmit power control (TPC). U-NII devices operating in the 5.25-5.35 GHz band and the 5.47-5.725 GHz band shall employ a TPC mechanism. The U-NII device is required to have the capability to operate at least 6 dB below the mean EIRP value of 30 dBm. A TPC mechanism is not required for systems with an e.i.r.p. of less than 500 mW.

Result: N/A, The output power is less than 500mW.

4.2 DFS: Standard Applicable

According to §15.407(h)(2) and FCC KDB 905462 D02 , Radar Detection Function of Dynamic Frequency Selection (DFS).

Radar Detection Function of Dynamic Frequency Selection (DFS). U-NII devices operating with any part of its 26 dB emission bandwidth in the 5.25-5.35 GHz and 5.47-5.725 GHz bands shall employ a DFS radar detection mechanism to detect the presence of radar systems and to avoid co-channel operation with radar systems. Operators shall only use equipment with a DFS mechanism that is turned on when operating in these bands. The device must sense for radar signals at 100 percent of its emission bandwidth. The minimum DFS detection threshold for devices with a maximum e.i.r.p. of 200 mW to 1 W is -64 dBm. For devices that operate with less than 200 mW e.i.r.p. and a power spectral density of less than 10 dBm in a 1 MHz band, the minimum detection threshold is -62 dBm. The detection threshold is the received power averaged over 1 microsecond referenced to a 0 dBi antenna. For the initial channel setting, the manufacturers shall be permitted to provide for either random channel selection or manual channel selection.

- (i) Operational Modes. The DFS requirement applies to the following operational modes:
 - (a) The requirement for channel availability check time applies in the master operational mode.
 - (b) The requirement for channel move time applies in both the master and slave operational modes.
- (ii) Channel Availability Check Time. A U-NII device shall check if there is a radar system already operating on the channel before it can initiate a transmission on a channel and when it has to move to a new channel. The U-NII device may start using the channel if no radar signal with a power level greater than the interference threshold values listed in paragraph (h)(2) of this section, is detected within 60 seconds.
- (iii) Channel Move Time. After a radar's presence is detected, all transmissions shall cease on the operating channel within 10 seconds. Transmissions during this period shall consist of normal traffic for a maximum of 200 ms after detection of the radar signal. In addition, intermittent management and control signals can be sent during the remaining time to facilitate vacating the operating channel.

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- (iv) Non-occupancy Period. A channel that has been flagged as containing a radar system, either by a channel availability check or in-service monitoring, is subject to a non-occupancy period of at least 30 minutes. The non-occupancy period starts at the time when the radar system is detected.

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4.2.1 Limit

Table 1: Applicability of DFS requirements prior to use of a channel

| Requirement | Operational Mode | | |
|---------------------------------|------------------|---------------------------------|------------------------------|
| | Master | Client(without radar detection) | Client(with radar detection) |
| Non-occupancy Period | Yes | Not required | Yes |
| DFS Detection Threshold | Yes | Not required | Yes |
| Channel Availability Check Time | Yes | Not required | Not required |
| U-NII Detection Bandwidth | Yes | Not required | Yes |

Table 2: Applicability of DFS requirements during normal operation

| Requirement | Operational Mode | |
|-----------------------------------|--|--------------------------------|
| | Master Device or Client with Radar Detection | Client Without Radar Detection |
| DFS Detection Threshold | Yes | Not required |
| Channel Closing Transmission time | Yes | Yes |
| Channel Move time | Yes | Yes |
| U-NII Detection Bandwidth | Yes | Not required |

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| Additional requirements for devices with multiple bandwidth mode | Master Device or Client with Radar Detection | Client Without Radar Detection |
|--|--|--|
| U-NII Detection Bandwidth and Statistical Performance Check | All BW modes must be tested | Not required |
| Channel Move Time and Channel Closing Transmission Time | Test using widest BW mode available | Test using the widest BW mode available for the link |
| All other tests | Any single BW mode | Not required |

Note: Frequencies selected for statistical performance check (Section 7.8.4) should include several frequencies within the radar detection bandwidth and frequencies near the edge of the radar detection bandwidth. For 802.11 devices it is suggested to select frequencies in each of the bonded 20 MHz channels and the channel center frequency.

Table 3: Interference Threshold values, Master or Client incorporating In-Service Monitoring

| Maximum Transmit Power | Value (See Notes 1, 2, and 3) |
|--|----------------------------------|
| EIRP \geq 200 milliwatt | -64 dBm |
| EIRP < 200 milliwatt and power spectral density < 10 dBm/MHz | -62 dBm |
| EIRP < 200 milliwatt that do not meet the power spectral density requirement | -64 dBm |

Note 1: This is the level at the input of the receiver assuming a 0 dBi receive antenna.
Note 2: Throughout these test procedures an additional 1 dB has been added to the amplitude of the test transmission waveforms to account for variations in measurement equipment. This will ensure that the test signal is at or above the detection threshold level to trigger a DFS response.
Note 3: EIRP is based on the highest antenna gain. For MIMO devices refer to KDB Publication 662911 D01.

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Table 4: DFS Response requirement values

| Parameter | Value |
|--|---|
| <i>Non-occupancy period</i> | Minimum 30 minutes |
| <i>Channel Availability Check Time</i> | 60 seconds |
| <i>Channel Move Time</i> | 10 seconds See Note 1. |
| <i>Channel Closing Transmission Time</i> | 200 milliseconds + an aggregate of 60 milliseconds over remaining 10 second period. See Notes 1 and 2. |
| <i>U-NII Detection Bandwidth</i> | Minimum 100% of the U-NII 99% transmission power bandwidth. See Note 3. |
| <p>Note 1: <i>Channel Move Time</i> and the <i>Channel Closing Transmission Time</i> should be performed with Radar Type 0. The measurement timing begins at the end of the Radar Type 0 burst.</p> <p>Note 2: The <i>Channel Closing Transmission Time</i> is comprised of 200 milliseconds starting at the beginning of the <i>Channel Move Time</i> plus any additional intermittent control signals required to facilitate a <i>Channel</i> move (an aggregate of 60 milliseconds) during the remainder of the 10 second period. The aggregate duration of control signals will not count quiet periods in between transmissions.</p> <p>Note 3: During the <i>U-NII Detection Bandwidth</i> detection test, radar type 0 should be used. For each frequency step the minimum percentage of detection is 90 percent. Measurements are performed with no data traffic.</p> | |

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Table 5: Radar Test Waveforms
Short Pulse Radar

| Radar Type | Pulse Width (μsec) | PRI (μsec) | Number of Pulses | Minimum Percentage of Successful Detection | Minimum Number of Trials |
|---|--------------------|--|---|--|--------------------------|
| 0 | 1 | 1428 | 18 | See Note 1 | See Note 1 |
| 1 | 1 | Test A: 15 unique PRI values randomly selected from the list of 23 PRI values in Table 5a Test B: 15 unique PRI values randomly selected within the range of 518-3066 μsec, with a minimum increment of 1 μsec, excluding PRI values selected in Test A | Roundup $\left\{ \left(\frac{1}{360} \right) \cdot \left(\frac{19 \cdot 10^6}{\text{PRI}_{\mu\text{SEC}}} \right) \right\}$ | 60% | 30 |
| 2 | 1-5 | 150-230 | 23-29 | 60% | 30 |
| 3 | 6-10 | 200-500 | 16-18 | 60% | 30 |
| 4 | 11-20 | 200-500 | 12-16 | 60% | 30 |
| Aggregate (Radar Types 1-4) | | | | 80% | 120 |
| Note 1: Short Pulse Radar Type 0 should be used for the detection bandwidth test, channel move time, and channel closing time tests. | | | | | |

Long Pulse Radar

| Radar Type | Pulse Width (μsec) | Chirp Width (MHz) | PRI (μsec) | Number of Pulses per Burst | Number of Bursts | Minimum Percentage of Successful Detection | Minimum Number of Trials |
|------------|--------------------|-------------------|------------|----------------------------|------------------|--|--------------------------|
| 5 | 50-100 | 5-20 | 1000-2000 | 1-3 | 8-20 | 80% | 30 |

Frequency Hopping Radar

| Radar Type | Pulse Width (μsec) | PRI (μsec) | Pulses per Hop | Hopping Rate (kHz) | Hopping Sequence Length (msec) | Minimum Percentage of Successful Detection | Minimum Number of Trials |
|------------|--------------------|------------|----------------|--------------------|--------------------------------|--|--------------------------|
| 6 | 1 | 333 | 9 | 0.333 | 300 | 70% | 30 |

The applicant of this given application confirms that information regarding the parameters of the detected Radar Waveforms is not available to the end user.

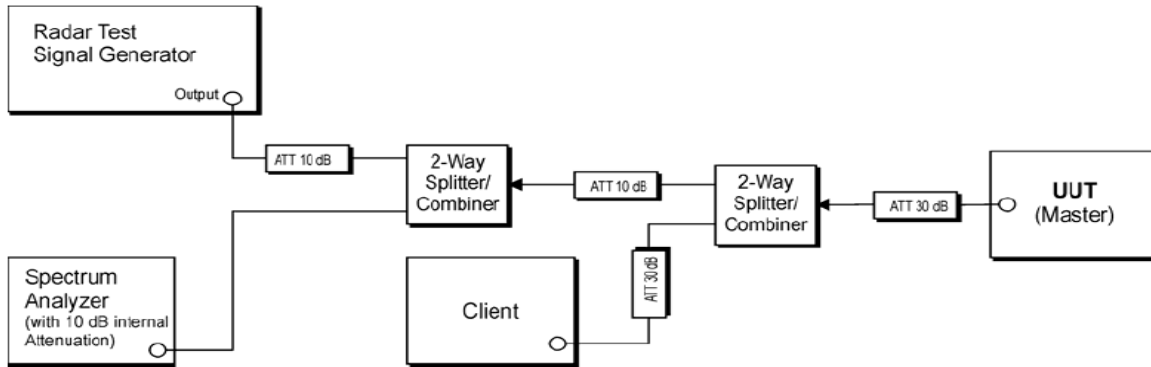
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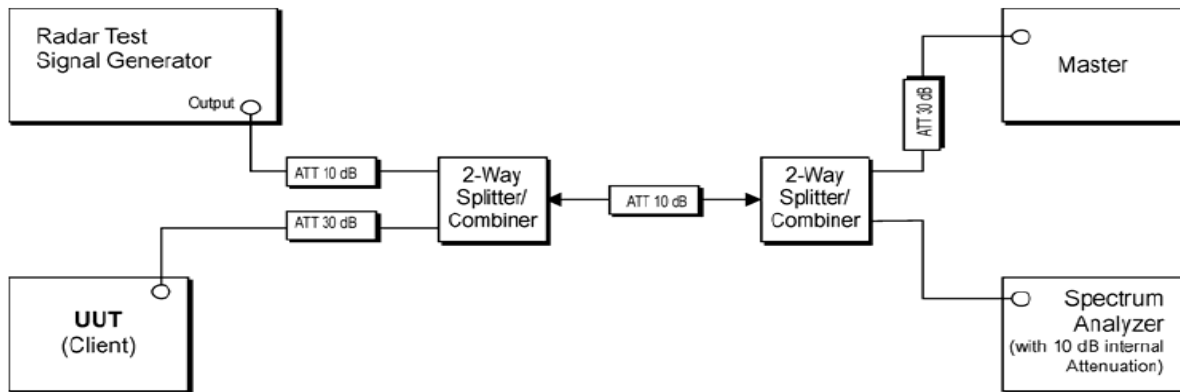
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4.2.2 Test Setup

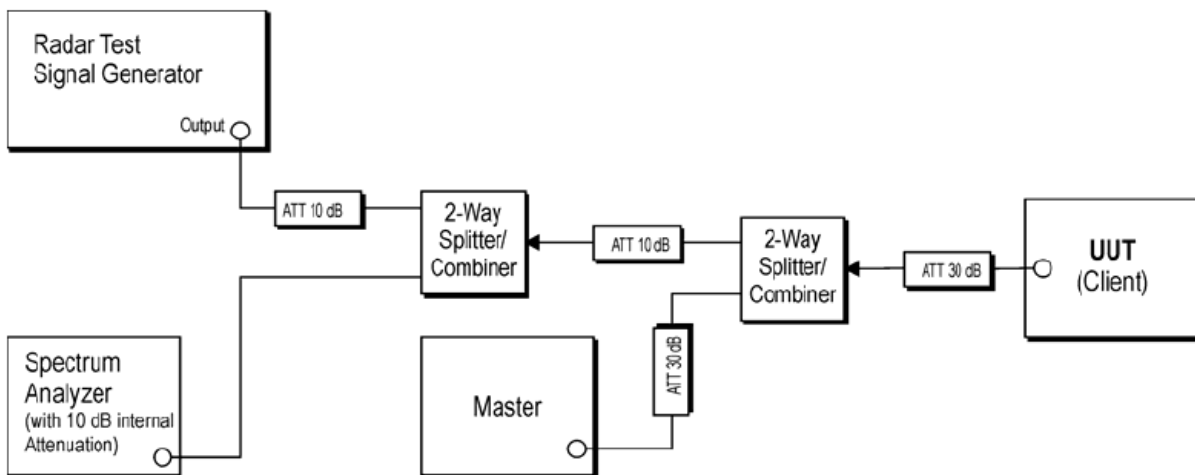
Setup for Master with injection at the Master



Setup for Client with injection at the Master



Setup for Client with injection at the Client



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4.2.3 Test Equipment Used:

| Conducted Emission Test Site | | | | | |
|------------------------------|-----------|-----------------|--|------------|------------|
| EQUIPMENT TYPE | MFR | MODEL NUMBER | SERIAL NUMBER | LAST CAL. | CAL DUE. |
| EMI Receiver | KEYSIGHT | N9038A | MY52260216 | 11/28/2019 | 11/27/2020 |
| Signal Generator | Keysight | N5182B | MY56200007 | 08/11/2019 | 08/10/2020 |
| Splitter | RF-LAMBAD | RFLT4W1G18 G | SPCD10-004 | 01/02/2020 | 01/01/2021 |
| Splitter | RF-LAMBAD | RFLT2W1G18 G | 11-JSPF412-0 20 | 01/02/2020 | 01/01/2021 |
| Splitter | RF-LAMBAD | RFLT2W1G18 G | 11-JSPF412-0 17 | 01/02/2020 | 01/01/2021 |
| Attenuator | Agilent | 8495B | 3308A22470 | 01/02/2020 | 01/01/2021 |
| Attenuator | HP | 8494B | 2812A170605 | 01/02/2020 | 01/01/2021 |
| Accece Ponit | ASUS | RT-AX88U | FCC ID :MSQ-RTA XHP00 IC : 3568A-RTAX HP00 CAN IC- ES-3(B)/NMB- 3(B) | N/A | N/A |

4.2.4 Description of EUT:

EUT operates over the 5250-5350MHz and 5470-5725MHz ranges and EUT is a slave device (client equipment) w/o radar detection and DFS capability.

EUT has no TPC mechanism implemented with no adjustment of lowest, and highest power, but the level of power emission stays at fixed level.

WLAN traffic is generated by streaming the mpeg file from the master to slave in full monitor video mode using the media player.

The rated output power of the master unit is >23dBm(EIRP).therefore the required interference threshold level is -64dBm.after correction for antenna gain and procedural adjustments, the required conducted threshold at the antenna port is -64dBm.

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While calibrate the path on antenna port of DFS test equipment (master), measurements equipments (spectrum) is ensured to be 50 Ohms, and therefore verification on antenna gain measurement can be ignored.

Conducted test was performed with appropriate adjustment, and calibration to ensure power from DFS simulator injects to antenna port of DFS test equipment (DFS) is -64dBm

Message or files that is used for communication between Master and Client:

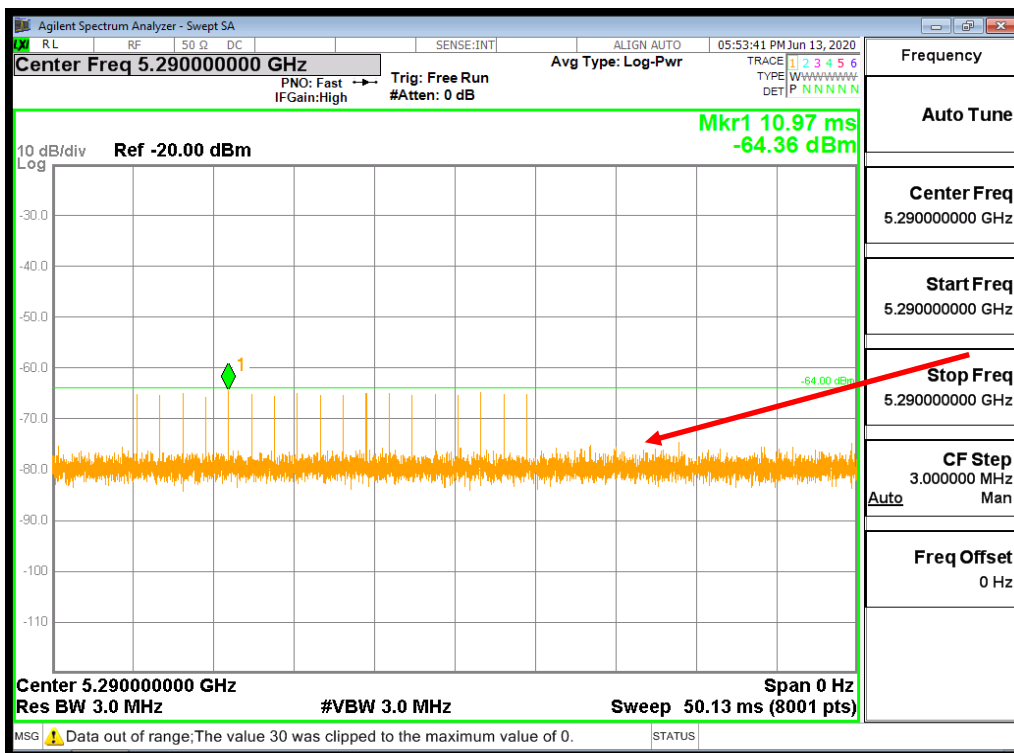
IP based system:

For the required channel loading, the full motion, 30 frames per second MPEG video file from <http://ntiacsd.ntia.doc.gov/dfs/> was streamed from a network on a test bench (server of the storage to download the mandatory format of Video file), via the DFS Master device, to the UE (mobile phone).

4.2.5 Test results

Calibration plots for each of the required radar waveforms

Radar type 0



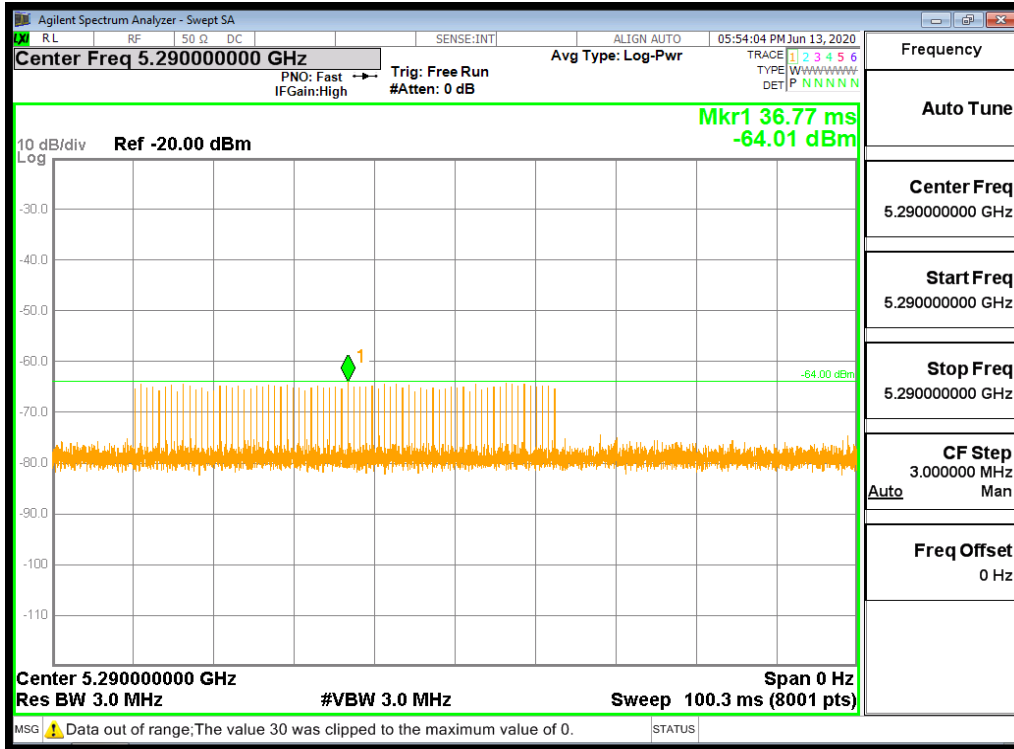
Noise Floor

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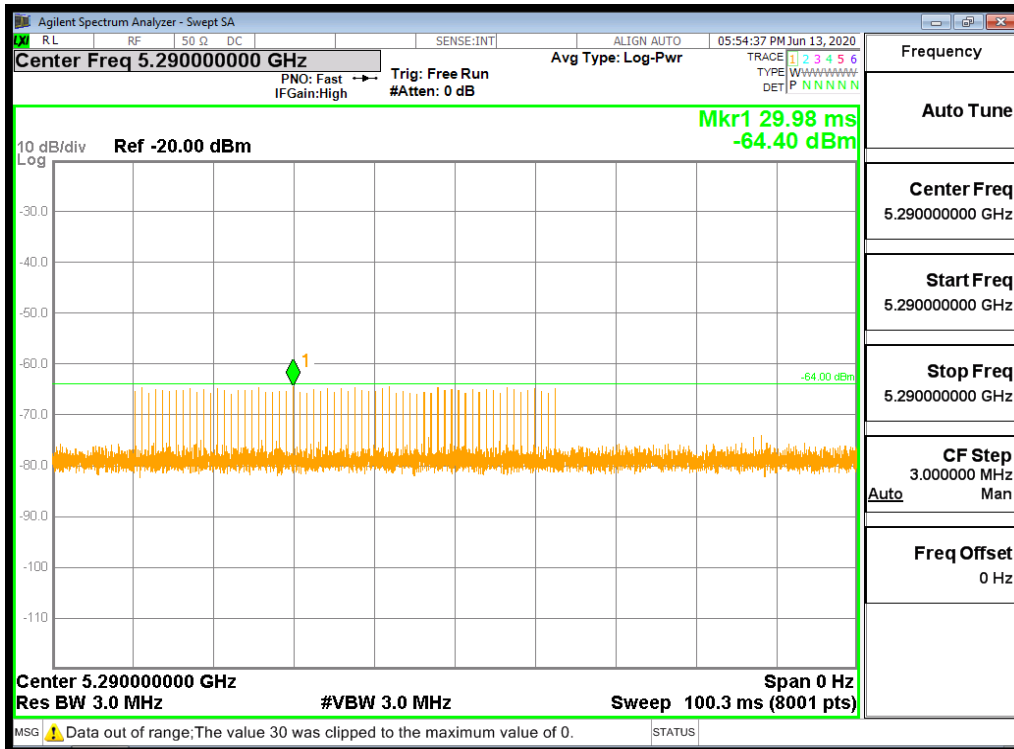
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Radar type 1 A



Radar type 1 B

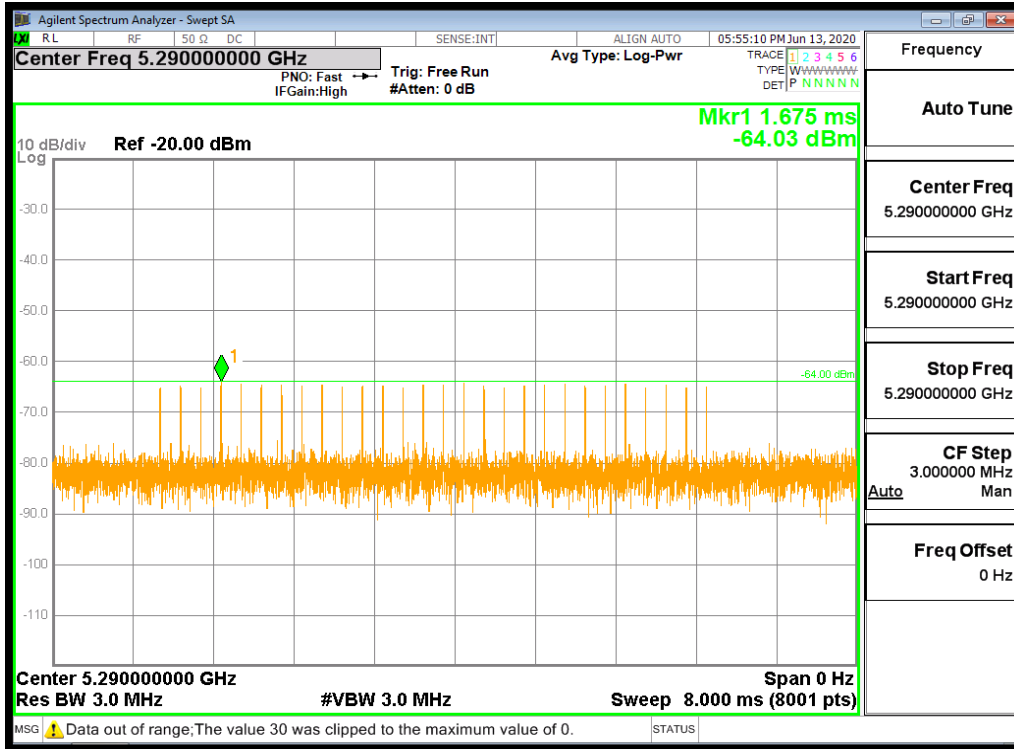


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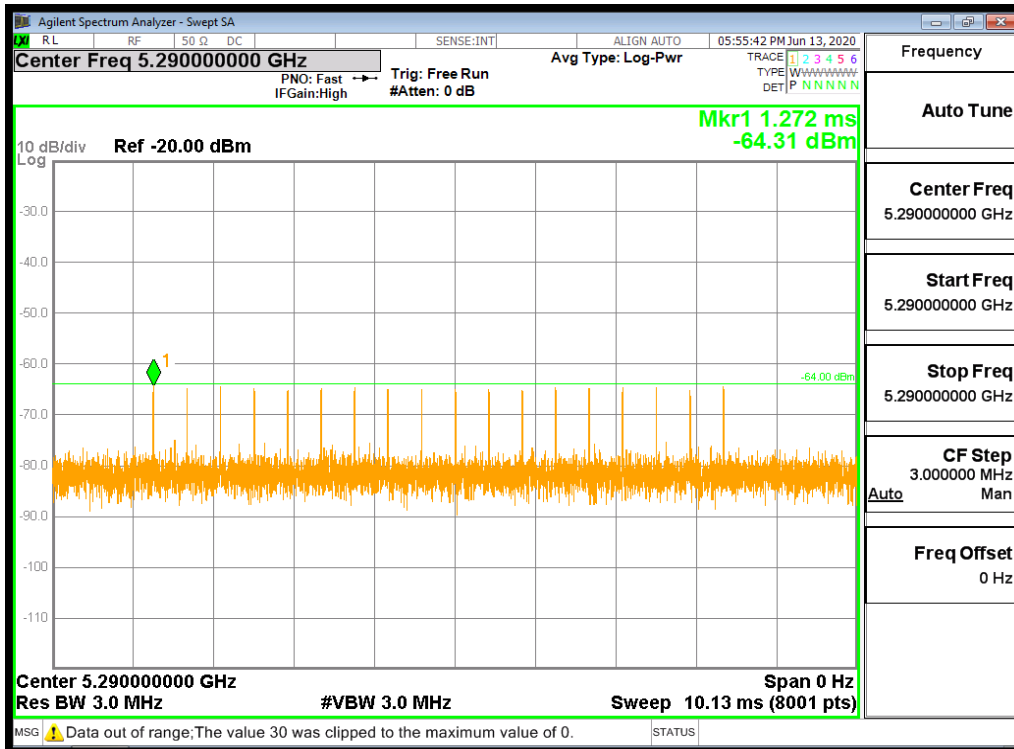
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Radar type 2



Radar type 3

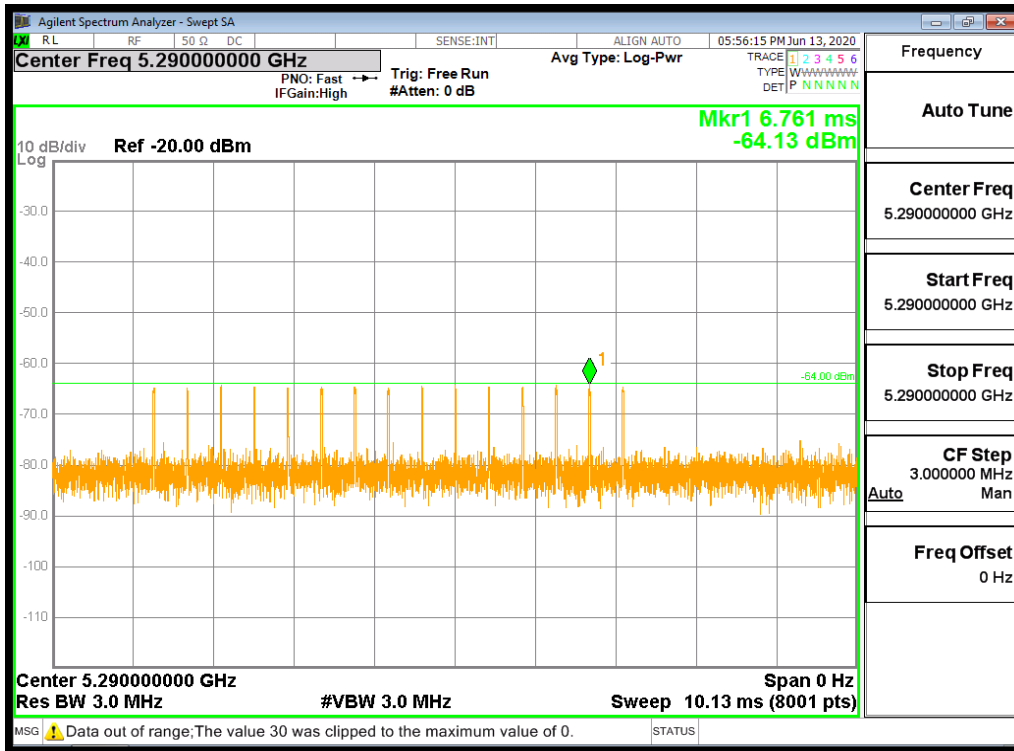


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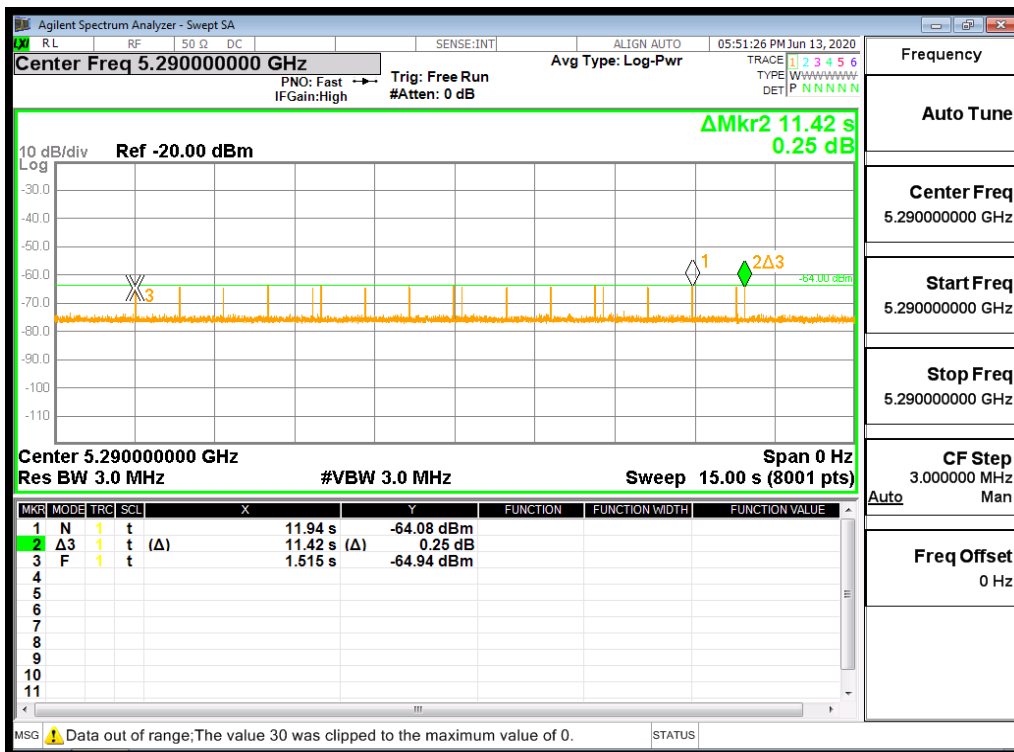
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Radar type 4



Radar type 5

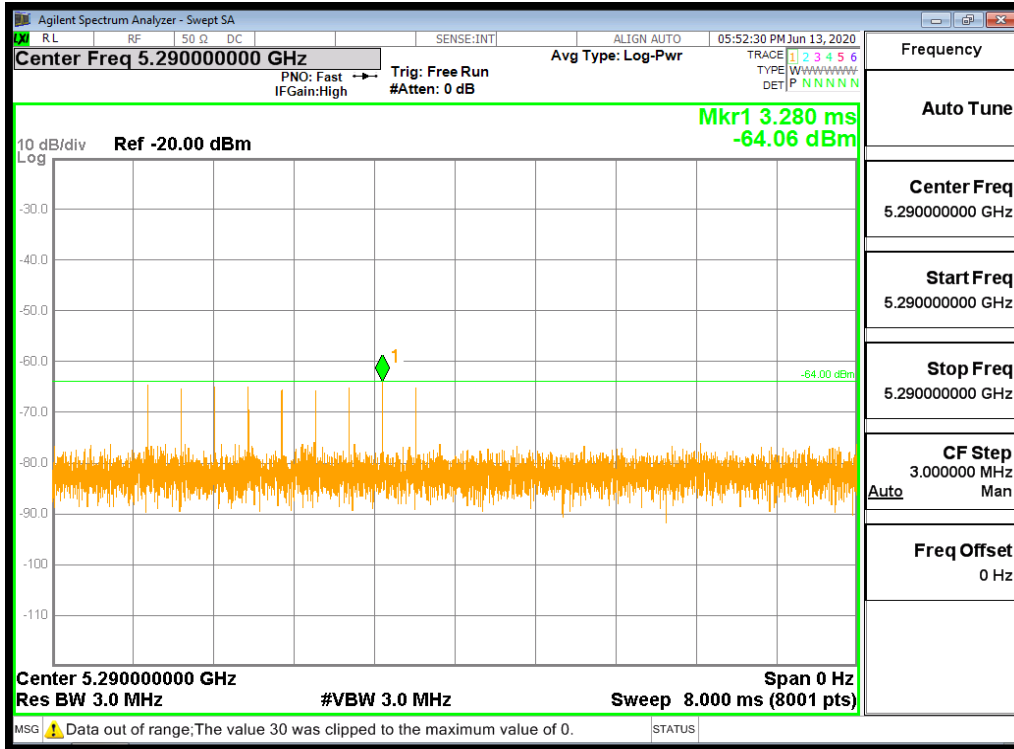


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Radar type 6

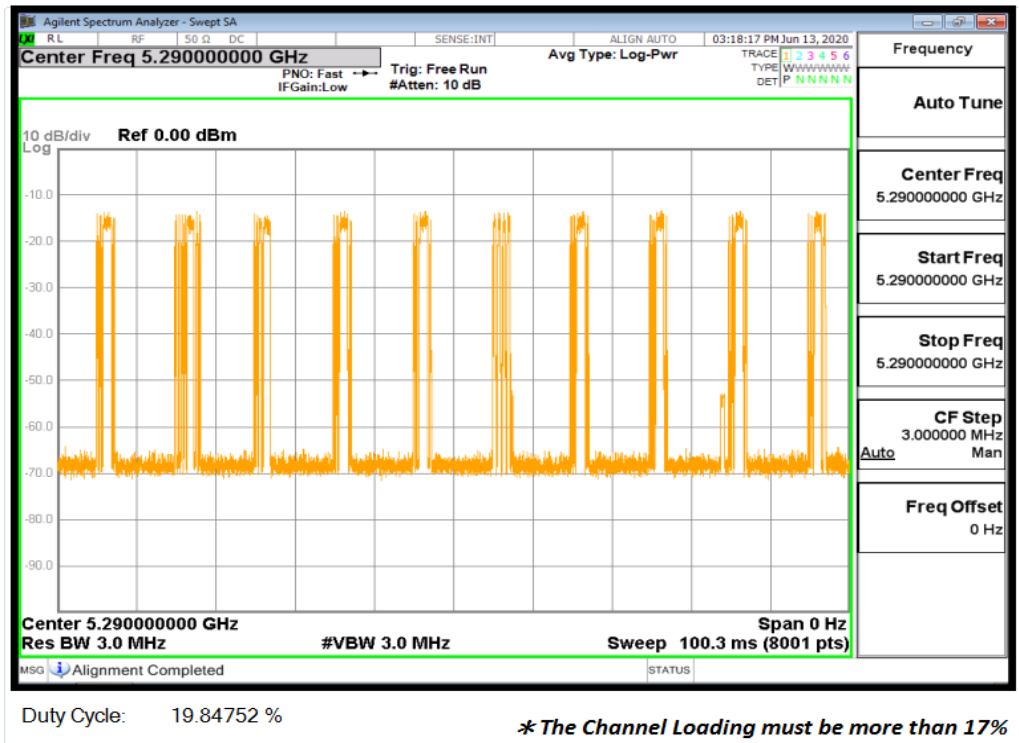


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WLAN traffic

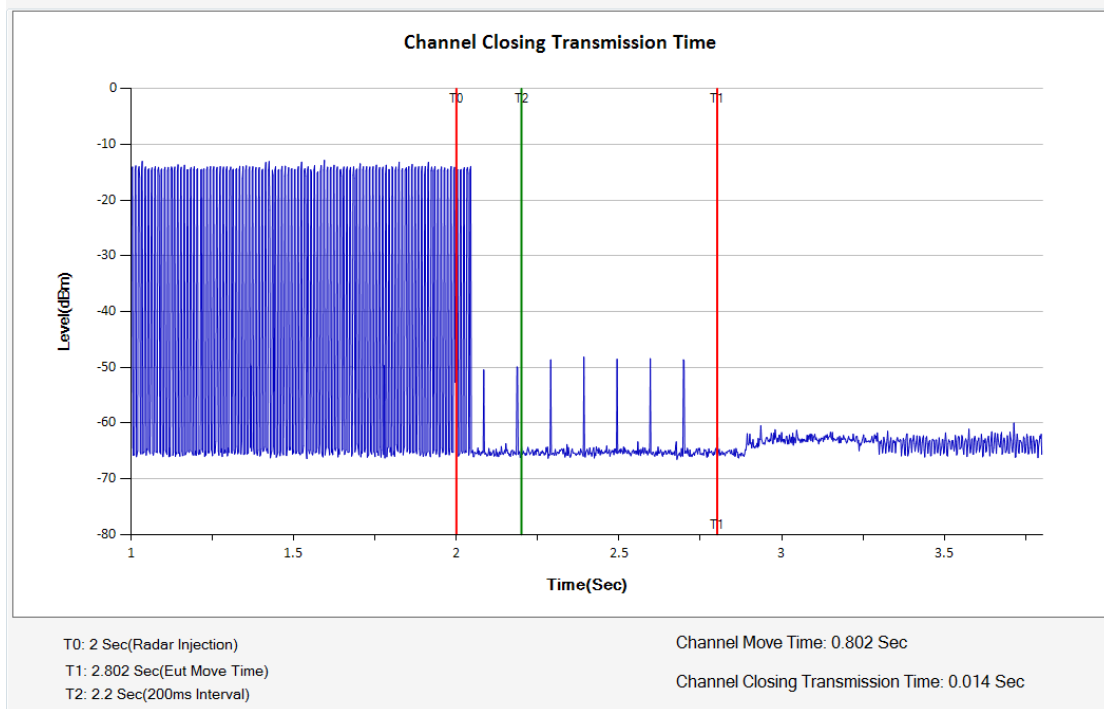


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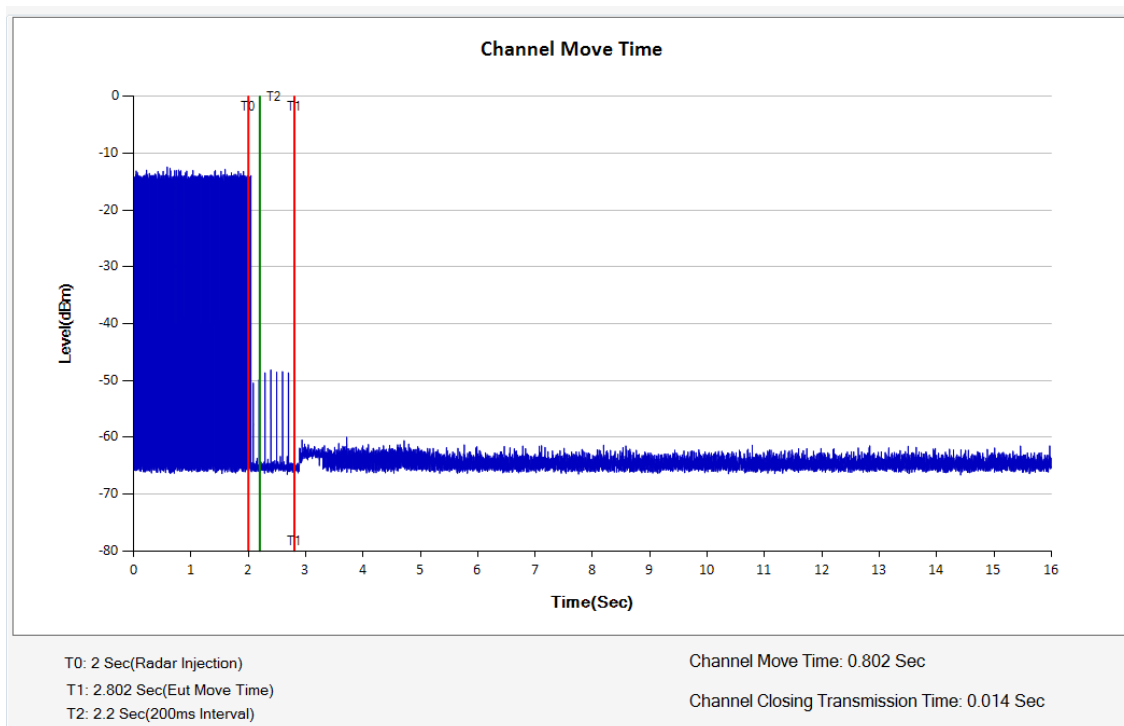
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Radar Type 0 Channel Move and Closing Transmission Time - 1



Radar Type 0 Channel Move and Closing Transmission Time - 2



Verdict: Note: narrowing the sweep time as the good engineering process for the verification of transmission closing in 200ms

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Non-occupancy Period (without radar detection)



Verdict: To verify whether channel is unavailable to be operated in 30 minutes.

$$1.8ks = 1800s = 1800 \text{ s/min} / 60 = 30\text{minute}$$

~ End of Report ~

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