



FCC PART 15.407


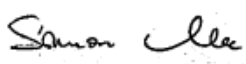
TEST REPORT

For

**Roku Inc.**

150 Winchester Circle,  
Los Gatos, CA 95032, USA

**FCC ID: TC2-R1031**

<b>Report Type:</b> Original Report	<b>Model:</b> 9101X
<b>Prepared By:</b> Christian McCaig Test Engineer	
<b>Report Number:</b> R1907164-407	
<b>Report Date:</b> 2019-08-21 Simon Ma	
<b>Reviewed By:</b> RF Supervisor	
Bay Area Compliance Laboratories Corp. 1274 Anvilwood Avenue, Sunnyvale, CA 94089, USA Tel: (408) 732-9162, Fax: (408) 732-9164	



**Note:** This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA\*, NIST, or any agency of the Federal Government.

\* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk “\*” en-2

## TABLE OF CONTENTS

<b>1</b>	<b>GENERAL DESCRIPTION.....</b>	<b>5</b>
1.1	PRODUCT DESCRIPTION FOR EQUIPMENT UNDER TEST (EUT).....	5
1.2	OBJECTIVE.....	5
1.3	RELATED SUBMITTAL(S)/GRANT(S).....	5
1.4	TEST METHODOLOGY.....	5
1.5	MEASUREMENT UNCERTAINTY.....	5
1.6	TEST FACILITY REGISTRATIONS.....	6
1.7	TEST FACILITY ACCREDITATIONS.....	6
<b>2</b>	<b>EUT TEST CONFIGURATION.....</b>	<b>9</b>
2.1	JUSTIFICATION.....	9
2.2	EUT EXERCISE SOFTWARE.....	9
2.3	DUTY CYCLE CORRECTION FACTOR.....	10
2.4	EQUIPMENT MODIFICATIONS.....	12
2.5	LOCAL SUPPORT EQUIPMENT.....	12
2.6	SUPPORT EQUIPMENT.....	12
2.7	INTERFACE PORTS AND CABLING.....	12
<b>3</b>	<b>SUMMARY OF TEST RESULTS.....</b>	<b>13</b>
<b>4</b>	<b>FCC §2.1091 &amp; §15.407(F) - RF EXPOSURE.....</b>	<b>14</b>
4.1	APPLICABLE STANDARDS.....	14
4.2	MPE PREDICTION.....	14
4.3	MPE RESULTS.....	15
<b>5</b>	<b>FCC §15.203 - ANTENNA REQUIREMENTS.....</b>	<b>17</b>
5.1	APPLICABLE STANDARDS.....	17
5.2	ANTENNA LIST.....	17
<b>6</b>	<b>FCC §15.207 - AC LINE CONDUCTED EMISSIONS.....</b>	<b>18</b>
6.1	APPLICABLE STANDARDS.....	18
6.2	TEST SETUP.....	18
6.3	TEST PROCEDURE.....	18
6.4	CORRECTED AMPLITUDE AND MARGIN CALCULATION.....	19
6.5	TEST EQUIPMENT LIST AND DETAILS.....	19
6.6	TEST ENVIRONMENTAL CONDITIONS.....	19
6.7	SUMMARY OF TEST RESULTS.....	20
6.8	CONDUCTED EMISSIONS TEST PLOTS AND DATA.....	21
<b>7</b>	<b>FCC §15.209 &amp; §15.407(B) - SPURIOUS RADIATED EMISSIONS.....</b>	<b>23</b>
7.1	APPLICABLE STANDARD.....	23
7.2	TEST SETUP.....	24
7.3	TEST PROCEDURE.....	24
7.4	CORRECTED AMPLITUDE AND MARGIN CALCULATION.....	25
7.5	TEST EQUIPMENT LIST AND DETAILS.....	26
7.6	TEST ENVIRONMENTAL CONDITIONS.....	26
7.7	SUMMARY OF TEST RESULTS.....	27
7.8	RADIATED EMISSIONS TEST RESULT DATA.....	28
<b>8</b>	<b>FCC §15.407(E) - 6 DB, 26 DB &amp; 99% OCCUPIED BANDWIDTH.....</b>	<b>41</b>
8.1	APPLICABLE STANDARDS.....	41
8.2	MEASUREMENT PROCEDURE.....	41
8.3	TEST EQUIPMENT LIST AND DETAILS.....	41

8.4	TEST ENVIRONMENTAL CONDITIONS.....	41
8.5	TEST RESULTS .....	41
<b>9</b>	<b>FCC §15.407(A) - OUTPUT POWER.....</b>	<b>45</b>
9.1	APPLICABLE STANDARDS .....	45
9.2	MEASUREMENT PROCEDURE .....	45
9.3	TEST EQUIPMENT LIST AND DETAILS .....	45
9.4	TEST ENVIRONMENTAL CONDITIONS.....	46
9.5	TEST RESULTS .....	47
<b>10</b>	<b>FCC §15.407(A) - POWER SPECTRAL DENSITY .....</b>	<b>49</b>
10.1	APPLICABLE STANDARDS .....	49
10.2	MEASUREMENT PROCEDURE .....	49
10.3	TEST EQUIPMENT LIST AND DETAILS .....	49
10.4	TEST ENVIRONMENTAL CONDITIONS.....	50
10.5	TEST RESULTS .....	51
<b>11</b>	<b>FCC §15.407(B) - OUT OF BAND EMISSIONS.....</b>	<b>53</b>
11.1	APPLICABLE STANDARDS .....	53
11.2	MEASUREMENT PROCEDURE .....	53
11.3	TEST EQUIPMENT LIST AND DETAILS .....	54
11.4	TEST ENVIRONMENTAL CONDITIONS.....	54
11.5	TEST RESULTS .....	54
<b>12</b>	<b>ANNEX A (NORMATIVE) – EUT TEST SETUP PHOTOGRAPHS .....</b>	<b>55</b>
<b>13</b>	<b>ANNEX B (NORMATIVE) – EUT EXTERNAL PHOTOGRAPHS .....</b>	<b>56</b>
<b>14</b>	<b>ANNEX C (NORMATIVE) – EUT INTERNAL PHOTOGRAPHS .....</b>	<b>57</b>
<b>15</b>	<b>ANNEX D - PLOTS.....</b>	<b>58</b>
<b>16</b>	<b>ANNEX E (NORMATIVE) - A2LA ELECTRICAL TESTING CERTIFICATE .....</b>	<b>59</b>

### DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1907164-407	Original Report	2019-08-21

## 1 General Description

### 1.1 Product Description for Equipment under Test (EUT)

This test and measurement report was prepared on behalf of *Roku Inc.*, FCC ID: TC2-R1031.

### 1.2 Objective

This report is prepared on behalf of *Roku Inc.* in accordance with FCC CFR47 §15.407.

The objective is to determine compliance with FCC Part 15.407 rules for Output Power, Antenna Requirements, AC Line Conducted Emissions, Emission Bandwidth, Power spectral density, and Radiated Spurious Emissions.

### 1.3 Related Submittal(s)/Grant(s)

FCC 15.247 Report: R1907164-247 (DTS), FCC ID: TC2-R1031

FCC 15.247 Report: R1907164-247 (DSS), FCC ID: TC2-R1031

### 1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the range of 9 kHz to 40 GHz, and FCC KDB 789033 D02 General UNII Test Procedure New Rules v02r01.

### 1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

## 1.6 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

## 1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

**A- An independent, 3<sup>rd</sup>-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02)**, in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (\*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

**B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03)** to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Industry Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.

- For Singapore (Info-Communications Development Authority (IDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2

2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
  - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
  - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
  - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
  - 1 MIC Telecommunication Business Law (Terminal Equipment):
    - All Scope A1 - Terminal Equipment for the Purpose of Calls;
    - All Scope A2 - Other Terminal Equipment
  - 2 Radio Law (Radio Equipment):
    - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
    - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
    - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

**C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:**

- 1 Electronics and Office Equipment:
  - for Telephony (ver. 3.0)
  - for Audio/Video (ver. 3.0)
  - for Battery Charging Systems (ver. 1.1)
  - for Set-top Boxes & Cable Boxes (ver. 4.1)
  - for Televisions (ver. 6.1)
  - for Computers (ver. 6.0)
  - for Displays (ver. 6.0)
  - for Imaging Equipment (ver. 2.0)
  - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
  - for Commercial Dishwashers (ver. 2.0)
  - for Commercial Ice Machines (ver. 2.0)
  - for Commercial Ovens (ver. 2.1)
  - for Commercial Refrigerators and Freezers
- 3 Lighting Products
  - For Decorative Light Strings (ver. 1.5)
  - For Luminaires (including sub-components) and Lamps (ver. 1.2)
  - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
  - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
  - for Residential Ceiling Fans (ver. 3.0)
  - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
  - For Water Coolers (ver. 3.0)

**D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:**

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;

- Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
  - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
  - o ENERGY STAR Recognized Test Laboratory – US EPA
  - o Telecommunications Certification Body (TCB) – US FCC;
  - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;



## 2 EUT Test Configuration

### 2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 789033 D02 General UNII Test Procedures New Rules v02r01.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

The worst-case data rates are determined by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

### 2.2 EUT Exercise Software

The test firmware used was Putty, the software is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Power Setting RADIO 2 Ant A & B	Power Setting RADIO 1 Ant A
802.11a	5180	51	58
	5220	51	58
	5240	51	58
	5745	53	63
	5785	52	63
	5825	52	63
802.11n20	5180	52	59
	5220	52	59
	5240	52	59
	5745	54	63
	5785	50	63
	5825	50	63
802.11ac20	5180	54	58
	5220	54	58
	5240	54	58
	5745	54	63
	5785	51	63
	5825	52	63

Data Rates Tested:

802.11a mode: 6Mbps

802.11n HT20 mode: MCS0

802.11ac VHT20 mode: MCS0

Note: Radio 2 is Roku Wifi 1 and Radio 1 is Roku Wifi 2 in the block diagram.

### 2.3 Duty Cycle Correction Factor

According to KDB 789033 D02 General UNII Test Procedures New Rules v02r01 section B:

All measurements are to be performed with the EUT transmitting at 100% duty cycle at its maximum power control level; however, if 100% duty cycle cannot be achieved, measurements of duty cycle,  $x$ , and maximum-power transmission duration,  $T$ , are required for each tested mode of operation.

#### Duty Cycle:

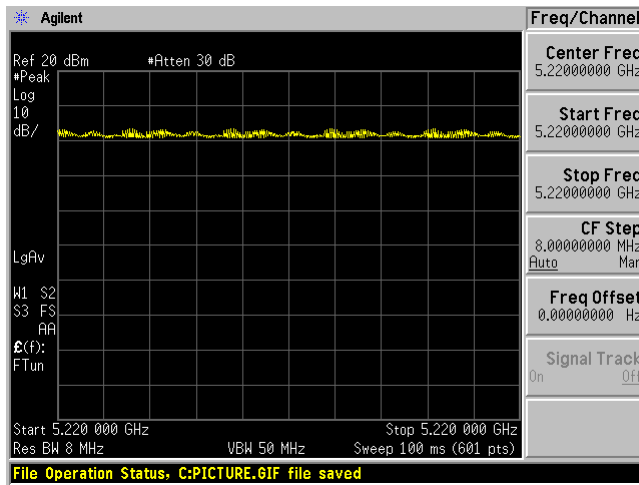
Radio Mode	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
802.11a	100	100	100	0.00
802.11n20	100	100	100	0.00
802.11ac20	100	100	100	0.00

Note: Duty Cycle Correction Factor =  $10 \cdot \log(1/\text{duty cycle})$

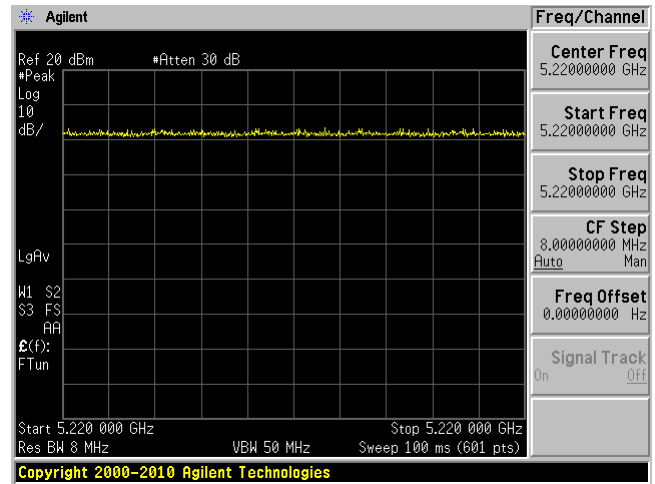
Please refer to the following plots.

Duty Cycle

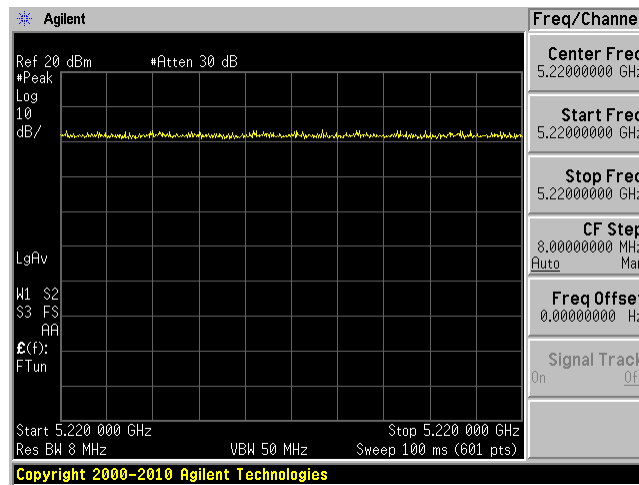
802.11 a mode



802.11 n20 mode



802.11 ac20 mode



## 2.4 Equipment Modifications

N/A

## 2.5 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6410	3CKRAQ1

## 2.6 Support Equipment

Manufacturer	Description	Model
Roku	Debug Board	Unknown

## 2.7 Interface Ports and Cabling

Cable Description	Length (m)	To	From
USB 2.0 A-Male to B-Male	2 m	Laptop	EUT
RF Cable	< 1 m	EUT	PSA

### 3 Summary of Test Results

FCC Rules	Description of Test	Result
§2.1091, §15.407(f),	RF Exposure	Compliant
§15.203	Antenna Requirement	Compliant
§15.207	AC Power Line Conducted Emissions	Compliant
§2.1053, §15.205, §15.209, 15.407(b)	Spurious Radiated Emissions	Compliant
§15.407(e)	Emission Bandwidth	Compliant
§407(a)	Output Power	Compliant
§2.1051, §15.407(b)	Band Edges	Compliant
§15.407(a)	Power Spectral Density	Compliant
§2.1051, §15.407(b)	Spurious Emissions at Antenna Terminals	Compliant

## 4 FCC §2.1091 & §15.407(f) - RF Exposure

### 4.1 Applicable Standards

According to FCC §15.407(f) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

#### Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Averaging Time (minutes)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* (180/f <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

### 4.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

### 4.3 MPE Results

#### Radio 1

##### 5 GHz Wi-Fi

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>21.91</u>
<u>Tuned up maximum output power at antenna input terminal (dBm):</u>	<u>22.91</u>
<u>Tuned up maximum output power at antenna input terminal (mW):</u>	<u>195.4339</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>5745</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>2.6</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.82</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.0708</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0708 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

##### 2.4 GHz Wi-Fi

<u>Maximum peak output power at antenna input terminal (dBm):</u>	<u>22.47</u>
<u>Tuned up maximum output power at antenna input terminal (dBm):</u>	<u>23.47</u>
<u>Tuned up maximum output power at antenna input terminal (mW):</u>	<u>222.331</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2437</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>1.8</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.51</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.0670</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0670 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

#### Radio 2

##### 5 GHz Wi-Fi

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>19.18</u>
<u>Tuned up maximum output power at antenna input terminal (dBm):</u>	<u>20.18</u>
<u>Tuned up maximum output power at antenna input terminal (mW):</u>	<u>104.232</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>5745</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>2.6</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.82</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.0378</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0378 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

**2.4 GHz Wi-Fi**

<u>Maximum peak output power at antenna input terminal (dBm):</u>	<u>22.02</u>
<u>Tuned up maximum output power at antenna input terminal (dBm):</u>	<u>23.02</u>
<u>Tuned up maximum output power at antenna input terminal (mW):</u>	<u>200.45</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2412</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>1.8</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.51</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.0604</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0604 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

**2.4 GHz Classic Bluetooth**

<u>Maximum peak output power at antenna input terminal (dBm):</u>	<u>12.81</u>
<u>Tuned up maximum output power at antenna input terminal (dBm):</u>	<u>13.81</u>
<u>Tuned up maximum output power at antenna input terminal (mW):</u>	<u>24.04</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2402</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>1.8</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.51</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>0.00724</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.00724mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

**Worst case colocation Radio 1 5 GHz Wi-Fi, Radio 2 2.4 GHz Wi-Fi and 2.4 GHz Classic Bluetooth:**

Frequency Band	Tuned up Max Conducted Power(dBm)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm <sup>2</sup> )	MPE Limit (mW/cm <sup>2</sup> )	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
Worst Case							
Radio 1 5 GHz WiFi	22.91	20	0.0708	1.0	7.08%	13.844%	100%
Radio 2 2.4 GHz WiFi	23.02	20	0.0604	1.0	6.04%		
2.4 GHz Classic BT	13.81	20	0.00724	1.0	0.724%		



## 5 FCC §15.203 - Antenna Requirements

### 5.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.407 (a) (ii), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

### 5.2 Antenna List

The antennas used by the EUT are permanent attached antennas.

	Antenna usage	Band of Operation (GHz)	Maximum Antenna Gain (dBi)
Radio 1	Wi-Fi	2400-2483.5	1.8
	Wi-Fi	5000-6000	2.6
Radio 2	Wi-Fi	2400-2483.5	1.8
	Wi-Fi	5000-6000	2.6

Antenna usage	Band of Operation (GHz)	Maximum Antenna Gain (dBi)
Bluetooth	2400-2483.5	1.8

## 6 FCC §15.207 - AC Line Conducted Emissions

### 6.1 Applicable Standards

As per FCC §15.207 Conducted limits:

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50  $\mu$ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

Frequency of Emission (MHz)	Conducted Limit (dBuV)	
	Quasi-Peak	Average
0.15-0.5	66 to 56 <sup>Note1</sup>	56 to 46 <sup>Note2</sup>
0.5-5	56	46
5-30	60	50

*Note1: Decreases with the logarithm of the frequency.*

*Note2: A linear average detector is required*

### 6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.207 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

The AC/DC power adapter of the EUT was connected with LISN-1 which provided 120 V / 60 Hz AC power.

### 6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data were recorded in the peak, quasi-peak, and average detection mode. Quasi-Peak readings are distinguished with a "QP." Average readings are distinguished with an "Ave".

## 6.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Cable Loss (CL), the Attenuator Factor (Atten) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + CL + Atten$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 dB) + Attenuator (10 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

## 6.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101964	2019-07-31	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150204	2019-02-25	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2019-04-11	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

*Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) “A2LA Policy on Metrological Traceability”.*

## 6.6 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	101.31 kPa

*The testing was performed by Corey Phan on 2019-08-09 in the outside emission test site.*

## 6.7 Summary of Test Results

According to the recorded data in following table, the EUT complied with the FCC 15C standard's conducted emissions limits, with the margin reading of:

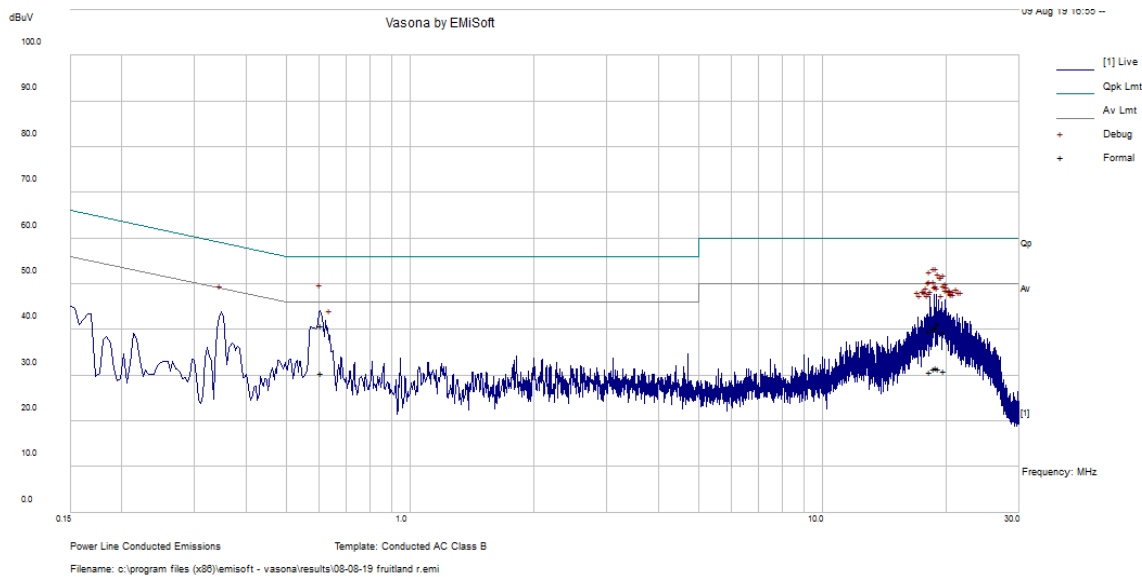
### Colocation 5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-15	0.608627	Line	0.15-30

### 6.8 Conducted Emissions Test Plots and Data

Worst Case Colocation, Radio 1-5 GHz Wi-Fi, Radio 2-5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth

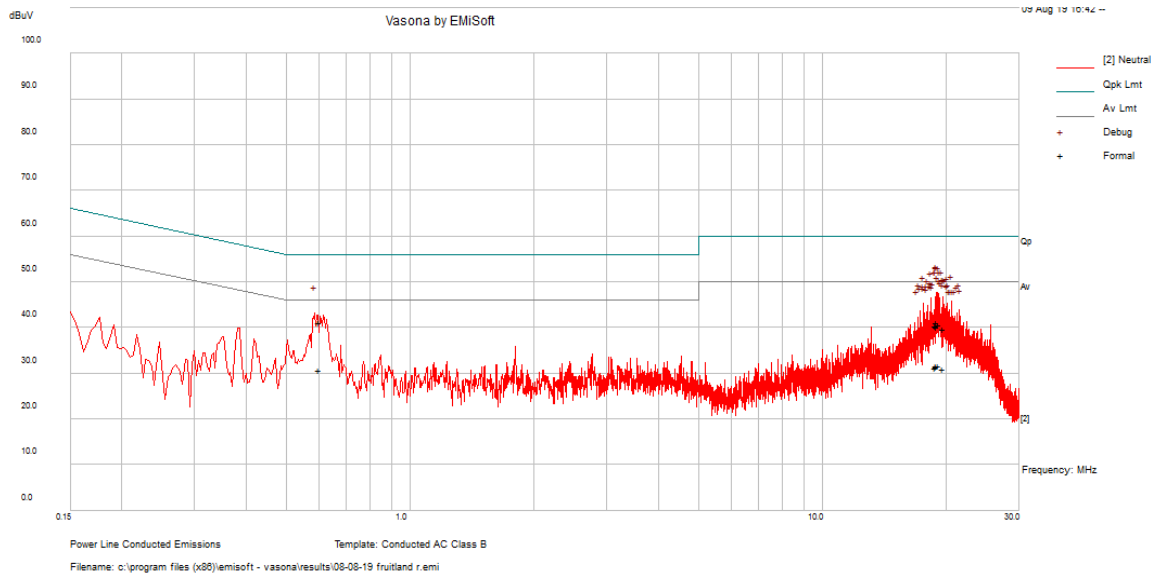
120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.608627	41	Line	56	-15	QP
18.910556	40.36	Line	60	-19.64	QP
18.685911	40.26	Line	60	-19.74	QP
18.229369	39.81	Line	60	-20.19	QP
19.114246	41.38	Line	60	-18.62	QP
19.790352	39.57	Line	60	-20.43	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.608627	30.39	Line	46	-15.61	Ave.
18.910556	31.69	Line	50	-18.31	Ave.
18.685911	31.53	Line	50	-18.47	Ave.
18.229369	30.69	Line	50	-19.31	Ave.
19.114246	31.34	Line	50	-18.66	Ave.
19.790352	31.04	Line	50	-18.96	Ave.

120 V, 60 Hz – Neutral



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
18.880579	40.23	Neutral	60	-19.77	QP
18.964867	41.06	Neutral	60	-18.94	QP
19.182076	40.73	Neutral	60	-19.27	QP
0.603812	41.07	Neutral	56	-14.93	QP
18.789467	40.39	Neutral	60	-19.61	QP
19.566725	39.71	Neutral	60	-20.29	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
18.880579	31.41	Neutral	50	-18.59	Ave.
18.964867	31.72	Neutral	50	-18.28	Ave.
19.182076	31.77	Neutral	50	-18.23	Ave.
0.603812	30.84	Neutral	46	-15.16	Ave.
18.789467	31.12	Neutral	50	-18.88	Ave.
19.566725	31.04	Neutral	50	-18.96	Ave.

## 7 FCC §15.209 & §15.407(b) - Spurious Radiated Emissions

### 7.1 Applicable Standard

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209: The emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/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 Note 1	3
88 - 216	150 Note 1	3
216 - 960	200 Note 1	3
Above 960	500	3

Note 1: Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC Part 15.407 (b)

(1) For transmitters operating in the 5.15-5.25 GHz band: All emissions outside of the 5.15-5.35 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

(2) For transmitters operating in the 5.25-5.35 GHz band: All emissions outside of the 5.15-5.35 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

(3) For transmitters operating in the 5.47-5.725 GHz band: All emissions outside of the 5.47-5.725 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

(4) For transmitters operating in the 5.725-5.85 GHz band:

(i) All emissions shall be limited to a level of  $-27$  dBm/MHz at 75 MHz or more above or below the band edge increasing linearly to 10 dBm/MHz at 25 MHz above or below the band edge, and from 25 MHz above or below the band edge increasing linearly to a level of 15.6 dBm/MHz at 5 MHz above or below the band edge, and from 5 MHz above or below the band edge increasing linearly to a level of 27 dBm/MHz at the band edge.

(ii) Devices certified before March 2, 2017 with antenna gain greater than 10 dBi may demonstrate compliance with the emission limits in §15.247(d), but manufacturing, marketing and importing of devices certified under this alternative must cease by March 2, 2018. Devices certified before March 2, 2018 with antenna gain of 10 dBi or less may demonstrate compliance with the emission limits in §15.247(d), but manufacturing, marketing and importing of devices certified under this alternative must cease before March 2, 2020.

(5) The emission measurements shall be performed using a minimum resolution bandwidth of 1 MHz. A lower resolution bandwidth may be employed near the band edge, when necessary, provided the measured energy is integrated to show the total power over 1 MHz.

(6) Unwanted emissions below 1 GHz must comply with the general field strength limits set forth in §15.209. Further, any U-NII devices using an AC power line are required to comply also with the conducted limits set forth in §15.207.

(7) The provisions of §15.205 apply to intentional radiators operating under this section.

(8) When measuring the emission limits, the nominal carrier frequency shall be adjusted as close to the upper and lower frequency band edges as the design of the equipment permits.

## 7.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15.407 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

## 7.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.



The EUT is set 3 meter away from the testing antenna, which is varied from 1-4 meter, and the EUT is placed on a turntable, which is 0.8 meter or 1.5 meter above ground plane, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 3MHz / Sweep = 100 ms
- (2) Average: RBW = 1MHz / VBW = 1 / T or 10 Hz / Sweep = Auto

#### 7.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$\text{CA} = \text{Ai} + \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit for Class A. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

## 7.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950K03	100044	2018-10-26	2 years
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-19	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 years
EMCO	Antenna, Horn	3115	9511-4627	2018-03-28	2 years
Agilent	Amplifier, Pre	8447D	2443A04374	2018-8-13	1 year
AH Systems	Pre-Amplifier 18-40GHz	PAM-1840VH	170	2018-09-10	1 year
Insulated Wire INC	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1501AN-3960- KPS	DC 1807	2018-03-13	2 years
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A
HP/Agilent	Pre-Amplifier	8449B	3008A01978	2018-08-17	1 year
Wisewave	Antenna, Horn 18-26.5GHz	ARH-4223-02	10555-02	2017-12-15	2 years
Wisewave	Antenna, Horn 26.5-40GHz	ARH-2823-02	10555-01	2017-09-18	2 years
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2019-04-02	2 years
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note<sup>1</sup>: cables included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

## 7.6 Test Environmental Conditions

<b>Temperature:</b>	20-22 °C
<b>Relative Humidity:</b>	42-50 %
<b>ATM Pressure:</b>	102.7 kPa

The testing was performed by Christian McCaig and Corey Phan from 2019-07-29 to 2019-08-07 in 5m chamber 3.

## 7.7 Summary of Test Results

According to the data hereinafter, the EUT complied with the FCC Part 15.407 standards' radiated emissions limits, and had the worst margin of:

### Radio 1:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, Channel
-0.15	10480	Horizontal	n20 mode, 5240 MHz

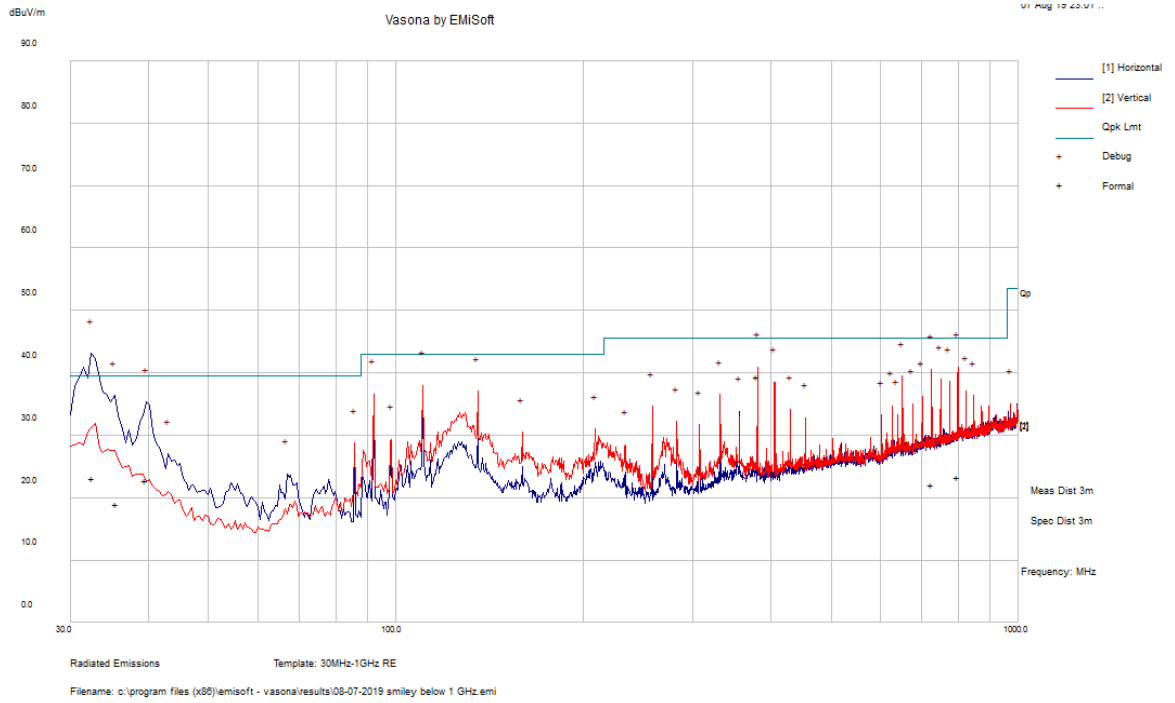
### Radio 2:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, Channel
-0.25	10480	Horizontal	n20 mode, 5240 MHz

### 7.8 Radiated Emissions Test Result Data

#### 1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

*Worst Case Colocation, Radio 1-5 GHz Wi-Fi, Radio 2-5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth*



Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
32.58025	23.07	146	H	56	39.5	-16.43	QP
35.56175	19.04	279	H	268	39.5	-20.46	QP
39.5535	22.82	148	H	257	39.5	-16.68	QP
799.32025	23.24	155	V	240	45.5	-22.26	QP
380.90625	39.38	104	V	44	45.5	-6.12	QP
725.2835	22.08	284	V	134	45.5	-23.42	QP

## 2) 1-40 GHz at 3 meter

**Radio 1**  
**5150 - 5250 MHz**

802.11a mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	50.00	194	236	H	33.59	8.958	35.515	57.03	74	-16.97	PK
5150	33.49	194	236	H	33.59	8.958	35.515	40.52	54	-13.48	AV
5150	53.84	275	220	V	33.542	8.958	35.515	60.82	74	-13.18	PK
5150	37.01	275	220	V	33.542	8.958	35.515	43.99	54	-10.01	AV
10360	51.29	0	100	H	38.17	13.71	35.42	67.75	68	-0.25	PK
10360	51.13	0	100	V	38.13	13.71	35.42	67.55	68	-0.45	PK
Middle Channel 5220 MHz											
10440	49.65	0	100	H	39.27	11.06	34.63	65.35	68	-2.65	PK
10440	50.53	0	100	V	39.27	11.06	34.63	66.23	68	-1.77	PK
High Channel 5240 MHz											
10480	51.57	0	100	H	39.31	11.27	34.63	67.52	68	-0.48	PK
10480	50.01	0	100	V	39.31	11.27	34.63	65.96	68	-2.04	PK

## 802.11n20 mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	61.65	196	219	H	33.99	7.87	35.52	68.00	74	-6.00	PK
5150	41.46	196	219	H	33.99	7.87	35.52	47.81	54	-6.19	AV
5150	65.79	276	222	V	33.99	7.87	35.52	72.14	74	-1.86	PK
5150	45.58	276	222	V	33.99	7.87	35.52	51.93	54	-2.07	AV
10360	51.42	0	100	H	39.24	11.06	34.63	67.09	68	-0.91	PK
10360	48.60	0	100	V	39.24	11.06	34.63	64.28	68	-3.72	PK
Middle Channel 5220 MHz											
10440	48.78	0	100	H	39.27	11.06	34.63	64.49	68	-3.51	PK
10440	47.93	0	100	V	39.27	11.06	34.63	63.63	68	-4.37	PK
High Channel 5240 MHz											
10480	51.90	0	100	H	39.31	11.27	34.63	67.85	68	-0.15	PK
10480	51.17	0	100	V	39.31	11.27	34.63	67.12	8	-0.88	PK

## 802.11ac20 mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	49.86	194	169	H	33.99	7.87	35.52	56.21	74	-17.79	PK
5150	33.68	194	169	H	33.99	7.87	35.52	40.03	54	-13.97	AV
5150	54.78	275	233	V	33.99	7.87	35.52	61.13	74	-12.87	PK
5150	37.00	275	233	V	33.99	7.87	35.52	43.35	54	-10.65	AV
10360	51.92	0	100	H	39.24	11.06	34.63	67.59	68	-0.41	PK
10360	51.86	0	100	V	39.24	11.06	34.63	67.53	68	-0.47	PK
Middle Channel 5220 MHz											
10440	51.74	0	100	H	39.27	11.06	34.63	67.44	68	-0.56	PK
10440	51.09	0	100	V	39.27	11.06	34.63	66.79	68	-1.21	PK
High Channel 5240 MHz											
10480	49.06	0	100	H	39.31	11.27	34.63	65.01	68	-2.99	PK
10480	49.56	0	100	V	39.31	11.27	34.63	65.51	68	-2.49	PK

## 5725 - 5850 MHz Harmonics

802.11a mode

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	43.01	0	100	H	38.95	12.37	33.83	60.49	74	-13.51	PK
11490	29.01	0	100	H	38.95	12.37	33.83	46.49	54	-7.51	AV
11490	42.87	0	100	V	38.95	12.37	33.83	60.35	74	-13.65	PK
11490	29.19	0	100	V	38.95	12.37	33.83	46.67	54	-7.33	AV
Middle Channel 5785 MHz											
11570	42.99	0	100	H	39.13	12.46	34.46	60.12	74	-13.88	PK
11570	29.27	0	100	H	39.13	12.46	34.46	46.39	54	-7.61	AV
11570	42.84	0	100	V	39.13	12.46	34.46	59.97	74	-14.03	PK
11570	29.13	0	100	V	39.13	12.46	34.46	46.26	54	-7.74	AV
High Channel 5825 MHz											
11650	43.34	0	100	H	39.13	12.45	34.21	60.70	74	-13.30	PK
11650	28.76	0	100	H	39.13	12.45	34.21	46.13	54	-7.87	AV
11650	42.78	0	100	V	39.13	12.45	34.21	60.14	74	-13.86	PK
11650	29.32	0	100	V	39.13	12.45	34.21	46.68	54	-7.32	AV

802.11n20 mode

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	43.64	0	100	H	38.95	12.37	33.83	61.12	74	-12.88	PK
11490	29.34	0	100	H	38.95	12.37	33.83	46.82	54	-7.18	AV
11490	42.87	0	100	V	38.95	12.37	33.83	60.36	74	-13.64	PK
11490	29.10	0	100	V	38.95	12.37	33.83	46.59	54	-7.41	AV
Middle Channel 5785 MHz											
11570	43.65	0	100	H	39.13	12.46	34.46	60.78	74	-13.22	PK
11570	28.55	0	100	H	39.13	12.46	34.46	45.68	54	-8.32	AV
11570	43.42	0	100	V	39.13	12.46	34.46	60.55	74	-13.45	PK
11570	29.33	0	100	V	39.13	12.46	34.46	46.46	54	-7.54	AV
High Channel 5825 MHz											
11650	42.52	0	100	H	39.13	12.45	34.21	59.88	74	-14.12	PK
11650	28.34	0	100	H	39.13	12.45	34.21	45.70	54	-8.30	AV
11650	42.71	0	100	V	39.13	12.45	34.21	60.07	74	-13.93	PK
11650	29.47	0	100	V	39.13	12.45	34.21	46.84	54	-7.16	AV



## 802.11ac20 mode

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	43.26	0	100	H	38.95	12.37	33.83	60.74	74	-13.26	PK
11490	29.53	0	100	H	38.95	12.37	33.83	47.02	54	-6.98	AV
11490	42.55	0	100	V	38.95	12.37	33.83	60.03	74	-13.97	PK
11490	29.14	0	100	V	38.95	12.37	33.83	46.63	54	-7.37	AV
Middle Channel 5785 MHz											
11570	43.55	0	100	H	39.13	12.46	34.46	60.68	74	-13.32	PK
11570	29.21	0	100	H	39.13	12.46	34.46	46.34	54	-7.66	AV
11570	43.68	0	100	V	39.13	12.46	34.46	60.80	74	-13.20	PK
11570	28.40	0	100	V	39.13	12.46	34.46	45.53	54	-8.47	AV
High Channel 5825 MHz											
11650	42.52	0	100	H	39.13	12.45	34.21	59.88	74	-14.12	PK
11650	28.34	0	100	H	39.13	12.45	34.21	45.70	54	-8.30	AV
11650	43.06	0	100	V	39.13	12.45	34.21	60.42	74	-13.58	PK
11650	29.18	0	100	V	39.13	12.45	34.21	46.55	54	-7.45	AV

## 5725 - 5850 MHz Band Edges

Please refer to Annex D for plots.

**Radio 2**  
**5150 - 5250 MHz**

802.11a mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	59.04	113	180	H	33.59	8.958	35.515	66.07	74	-7.93	PK
5150	42.12	113	180	H	33.59	8.958	35.515	49.15	54	-4.85	AV
5150	57.75	156	142	V	33.542	8.958	35.515	64.73	74	-9.27	PK
5150	40.76	156	142	V	33.542	8.958	35.515	47.74	54	-6.26	AV
10360	51.27	115	160	H	38.17	13.71	35.42	67.73	68	-0.27	PK
10360	51.09	135	120	V	38.13	13.71	35.42	67.51	68	-0.49	PK
Middle Channel 5220 MHz											
10440	49.48	91	138	H	39.27	11.06	34.63	65.18	68	-2.82	PK
10440	50.48	160	140	V	39.27	11.06	34.63	66.18	68	-2.82	PK
High Channel 5240 MHz											
10480	51.50	109	171	H	39.31	11.27	34.63	67.45	68	-0.55	PK
10480	49.88	158	138	V	39.31	11.27	34.63	65.83	68	-2.17	PK

## 802.11n20 mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	56.91	111	149	H	33.99	7.87	35.52	63.26	74	-10.74	PK
5150	35.91	111	149	H	33.99	7.87	35.52	42.26	54	-11.74	AV
5150	60.32	172	271	V	33.99	7.87	35.52	66.67	74	-7.33	PK
5150	35.26	172	271	V	33.99	7.87	35.52	41.61	54	-12.39	AV
10360	49.01	126	163	H	39.24	11.06	34.63	64.68	68	-3.32	PK
10360	48.58	177	271	V	39.24	11.06	34.63	64.25	68	-3.75	PK
Middle Channel 5220 MHz											
10440	48.73	127	143	H	39.27	11.06	34.63	64.43	68	-3.57	PK
10440	47.73	151	130	V	39.27	11.06	34.63	63.43	68	-4.57	PK
High Channel 5240 MHz											
10480	51.80	110	154	H	39.31	11.27	34.63	67.75	68	-0.25	PK
10480	51.16	151	132	V	39.31	11.27	34.63	67.11	68	-0.89	PK

## 802.11ac20 mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5180 MHz											
5150	57.61	149	100	H	33.99	7.87	35.52	63.96	74	-10.04	PK
5150	42.08	149	100	H	33.99	7.87	35.52	48.43	54	-5.57	AV
5150	58.81	137	124	V	33.99	7.87	35.52	65.16	74	-8.84	PK
5150	42.22	137	124	V	33.99	7.87	35.52	48.57	54	-5.43	AV
10360	51.47	128	120	H	39.24	11.06	34.63	67.14	68	-0.86	PK
10360	51.67	166	150	V	39.24	11.06	34.63	67.34	68	-0.66	PK
Middle Channel 5220 MHz											
10440	51.57	16	158	H	39.27	11.06	34.63	67.27	68	-0.73	PK
10440	50.98	155	255	V	39.27	11.06	34.63	66.68	68	-1.32	PK
High Channel 5240 MHz											
10480	48.80	110	171	H	39.31	11.27	34.63	64.75	68	-3.25	PK
10480	49.38	139	214	V	39.31	11.27	34.63	65.33	68	-2.67	PK

## 5725 - 5850 MHz Harmonics

802.11a mode

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	51.36	0	100	H	38.95	14.37	33.83	70.84	74	-3.16	PK
11490	30.48	0	100	H	38.95	14.37	33.83	49.96	54	-4.04	AV
11490	51.33	0	100	V	38.95	14.37	33.83	70.82	74	-3.18	PK
11490	30.11	0	100	V	38.95	14.37	33.83	49.59	54	-4.41	AV
Middle Channel 5785 MHz											
11570	51.63	0	100	H	39.13	12.46	34.46	68.76	74	-5.24	PK
11570	32.12	0	100	H	39.13	12.46	34.46	49.24	54	-4.76	AV
11570	51.46	0	100	V	39.13	12.46	34.46	68.58	74	-5.42	PK
11570	31.40	0	100	V	39.13	12.46	34.46	48.53	54	-5.47	AV
High Channel 5825 MHz											
11650	52.23	0	100	H	39.13	12.45	34.21	69.60	74	-4.40	PK
11650	31.10	0	100	H	39.13	12.45	34.21	48.46	54	-5.54	AV
11650	52.39	0	100	V	39.13	12.45	34.21	69.75	74	-4.25	PK
11650	32.17	0	100	V	39.13	12.45	34.21	49.54	54	-4.46	AV

802.11n20 mode

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	47.82	218	151	H	38.95	12.37	33.83	65.30	74	-8.70	PK
11490	31.71	218	151	H	38.95	12.37	33.83	49.19	54	-4.81	AV
11490	46.81	79	149	V	38.95	12.37	33.83	64.29	74	-9.71	PK
11490	32.08	79	149	V	38.95	12.37	33.83	49.56	54	-4.44	AV
Middle Channel 5785 MHz											
11570	49.05	106	151	H	39.13	12.46	34.46	66.18	74	-7.82	PK
11570	32.52	106	151	H	39.13	12.46	34.46	49.65	54	-4.35	AV
11570	45.51	165	160	V	39.13	12.46	34.46	62.64	74	-11.36	PK
11570	32.05	165	160	V	39.13	12.46	34.46	49.18	54	-4.82	AV
High Channel 5825 MHz											
11650	49.24	144	100	H	39.13	12.45	34.21	66.60	74	-7.40	PK
11650	28.40	144	100	H	39.13	12.45	34.21	45.76	54	-8.24	AV
11650	48.41	208	100	V	39.13	12.45	34.21	65.77	74	-8.23	PK
11650	33.73	208	100	V	39.13	12.45	34.21	51.09	54	-2.91	AV

## 802.11ac20 mode

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC		Comments (PK/Ave.)
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 5745 MHz											
11490	50.00	218	100	H	38.95	12.37	33.83	67.48	74	-6.52	PK
11490	31.08	218	100	H	38.95	12.37	33.83	48.56	54	-5.44	AV
11490	49.56	218	100	V	38.95	12.37	33.83	67.04	74	-6.96	PK
11490	31.88	218	100	V	38.95	12.37	33.83	49.36	54	-4.64	AV
Middle Channel 5785 MHz											
11570	47.52	104	137	H	39.13	12.46	34.46	64.65	74	-9.35	PK
11570	31.99	104	137	H	39.13	12.46	34.46	49.12	54	-4.88	AV
11570	46.62	163	121	V	39.13	12.46	34.46	63.75	74	-10.25	PK
11570	31.65	163	121	V	39.13	12.46	34.46	48.78	54	-5.22	AV
High Channel 5825 MHz											
11650	48.12	117	100	H	39.13	12.45	34.21	65.48	74	-8.52	PK
11650	31.55	117	100	H	39.13	12.45	34.21	48.91	54	-5.09	AV
11650	46.62	168	162	V	39.13	12.45	34.21	63.98	74	-10.02	PK
11650	31.00	168	162	V	39.13	12.45	34.21	48.36	54	-5.64	AV

## 5725 - 5850 MHz Band Edges

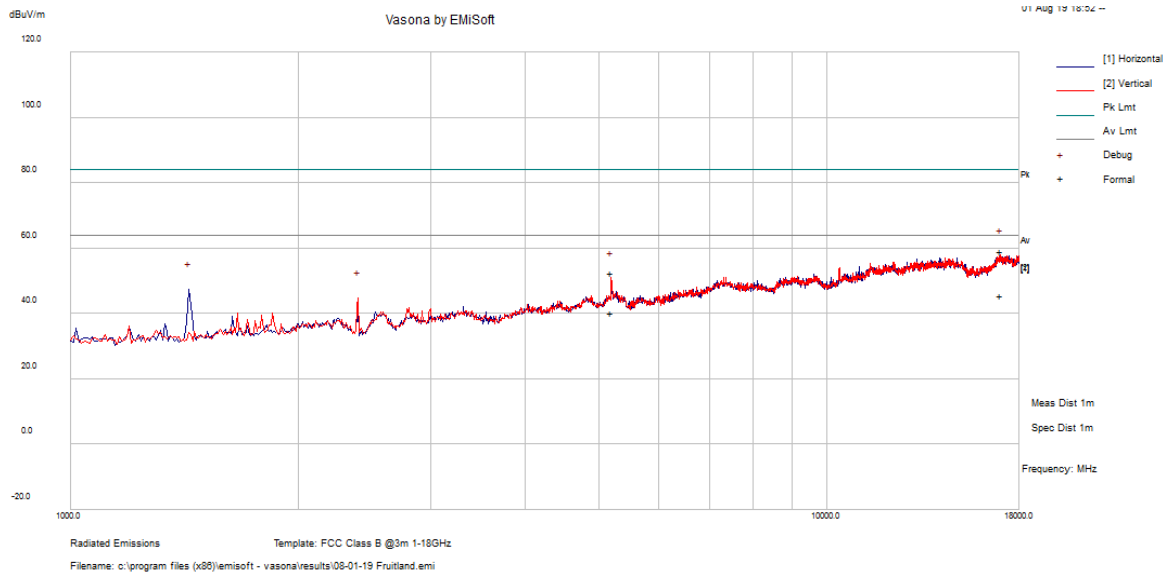
Please refer to Annex D for plots.

Note 1: Any emissions above 12 GHz are emissions from the noise floor.

Note 2: The worst-case modulations were used to show compliance.

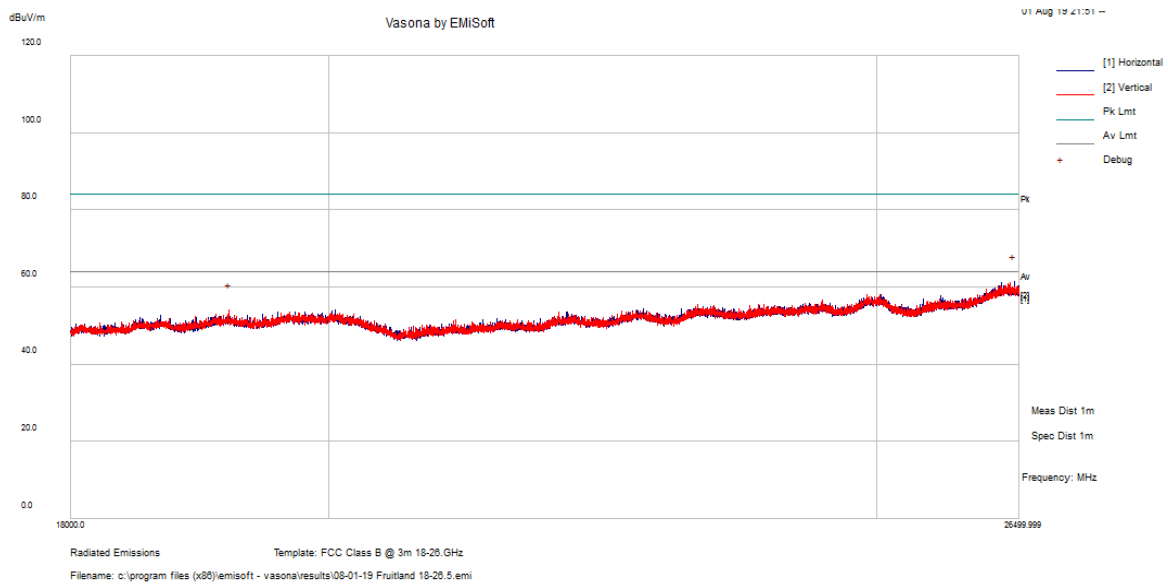
### 1 GHz – 18 GHz Worst Case Scan at 1 meter

*Worst Case Colocation, Radio 1-5 GHz Wi-Fi, Radio 2-5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth*



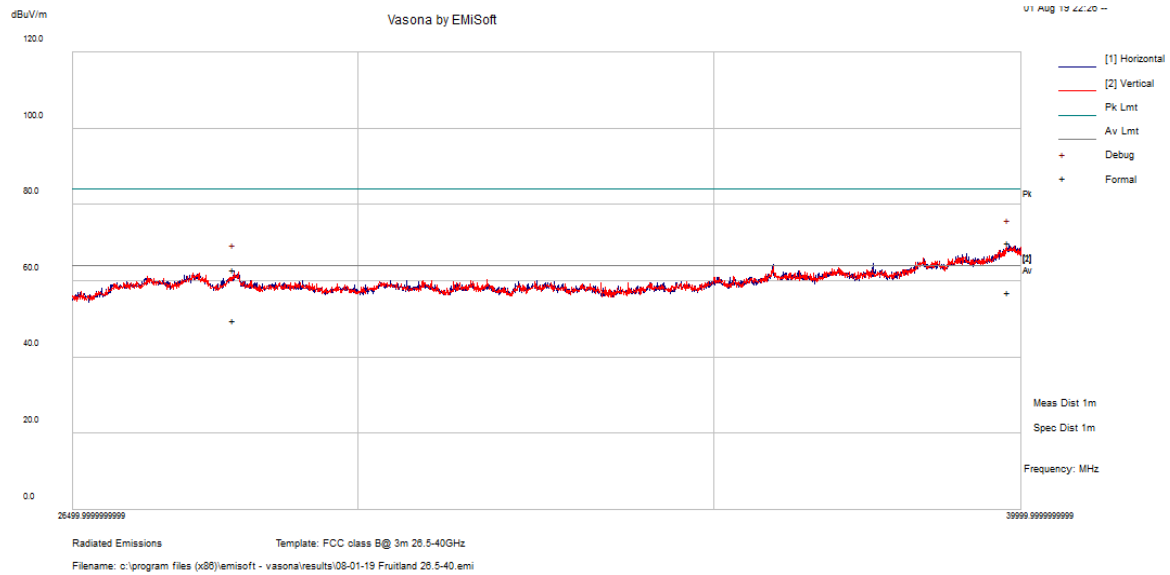
### 18 GHz – 26.5 GHz Worst Case Scan at 1 meter

*Worst Case Colocation, Radio 1-5 GHz Wi-Fi, Radio 2-5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth*



### 26.5 GHz – 40 GHz Worst Case Scan at 1 meter

*Worst Case Colocation, Radio 1-5 GHz Wi-Fi, Radio 2-5 GHz Wi-Fi and 2.4 GHz Classic Bluetooth*





## 8 FCC §15.407(e) - 6 dB, 26 dB & 99% Occupied Bandwidth

### 8.1 Applicable Standards

As per FCC §15.407(e): for equipment operating in the band 5725 – 5850 MHz, the minimum 6 dB bandwidth of U-NII devices shall be 500 kHz.

### 8.2 Measurement Procedure

The measurements are based on FCC KDB 789033 D02 General U-NII Test Procedures New Rules v02r01: C. Bandwidth Measurement.

### 8.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-06	1 year
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note1: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) “A2LA Policy on Metrological Traceability”.

### 8.4 Test Environmental Conditions

<b>Temperature:</b>	24 °C
<b>Relative Humidity:</b>	44 %
<b>ATM Pressure:</b>	102.5kPa

The testing was performed by Zhao Zhao on 2019-07-09 in RF site.

### 8.5 Test Results

Please refer to the following table

**5150 - 5250 MHz**

**RADIO 2 Ant A**

Channel	Frequency (MHz)	99% OBW (MHz)
802.11a mode		
36	5180	16.9706
40	5220	16.6915
48	5240	16.6514
802.11n20 mode		
36	5180	17.9440
40	5220	17.8145
48	5240	17.7594
802.11ac20 mode		
36	5180	18.6797
40	5220	18.0355
48	5240	17.8986

**RADIO 2 Ant B**

Channel	Frequency (MHz)	99% OBW (MHz)
802.11a mode		
36	5180	16.5336
40	5220	16.5304
48	5240	16.5271
802.11n20 mode		
36	5180	17.6373
40	5220	17.6396
48	5240	17.6402
802.11ac20 mode		
36	5180	17.6631
40	5220	17.6691
48	5240	17.6662

**RADIO 1 Ant A**

Channel	Frequency (MHz)	99% OBW (MHz)
802.11a mode		
36	5180	19.8957
40	5220	20.4561
48	5240	20.5840
802.11n20 mode		
36	5180	20.3306
40	5220	21.0414
48	5240	21.5254
802.11ac20 mode		
36	5180	20.6212
40	5220	21.1964
48	5240	21.4187

**5725 - 5850 MHz****RADIO 2 Ant A**

Channel	Frequency (MHz)	99% OBW (MHz)	6 dB OBW (MHz)	6 dB OBW limit (kHz)
802.11a mode				
149	5745	17.0142	16.509	≥500
157	5785	16.7590	16.509	≥500
165	5825	16.6905	16.541	≥500
802.11n20 mode				
149	5745	18.2729	17.689	≥500
157	5785	17.8279	17.674	≥500
165	5825	17.7597	17.656	≥500
802.11ac20 mode				
149	5745	18.3000	17.717	≥500
157	5785	17.8622	17.663	≥500
165	5825	17.8046	17.653	≥500

**RADIO 2 Ant B**

Channel	Frequency (MHz)	99% OBW (MHz)	6 dB OBW (MHz)	6 dB OBW limit (kHz)
802.11a mode				
149	5745	16.5302	16.525	≥500
157	5785	16.5141	16.505	≥500
165	5825	16.5266	16.532	≥500
802.11n20 mode				
149	5745	17.6352	17.663	≥500
157	5785	17.6181	17.666	≥500
165	5825	17.6264	17.658	≥500
802.11ac20 mode				
149	5745	17.6494	17.671	≥500
157	5785	17.6370	17.668	≥500
165	5825	17.6395	17.663	≥500

**RADIO 1 Ant A**

Channel	Frequency (MHz)	99% OBW (MHz)	6 dB OBW (MHz)	6 dB OBW limit (kHz)
802.11a mode				
149	5745	21.4969	16.495	≥500
157	5785	21.3076	16.494	≥500
165	5825	21.1206	16.508	≥500
802.11n20 mode				
149	5745	22.3259	17.761	≥500
157	5785	21.6614	17.763	≥500
165	5825	21.7002	17.749	≥500
802.11ac20 mode				
149	5745	22.4698	17.756	≥500
157	5785	22.0599	17.768	≥500
165	5825	21.8278	17.769	≥500

Please refer to Annex D for plots.

## 9 FCC §15.407(a) - Output Power

### 9.1 Applicable Standards

According to FCC §15.407(a):

For client devices in the 5.15-5.25 GHz band, the maximum conducted output power over the frequency band of operation shall not exceed 250 mW provided the maximum antenna gain does not exceed 6 dBi. In addition, the maximum power spectral density shall not exceed 11 dBm in any 1 megahertz band. If transmitting antennas of directional gain greater than 6 dBi are used, both the maximum conducted output power and the maximum power spectral density shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

For the band 5.725-5.85 GHz, the maximum conducted output power over the frequency band of operation shall not exceed 1 W. In addition, the maximum power spectral density shall not exceed 30 dBm in any 500-kHz band. If transmitting antennas of directional gain greater than 6 dBi are used, both the maximum conducted output power and the maximum power spectral density shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi. However, fixed point-to-point U-NII devices operating in this band may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter conducted power. Fixed, point-to-point operations exclude the use of point-to-multipoint systems, omnidirectional applications, and multiple collocated transmitters transmitting the same information. The operator of the U-NII device, or if the equipment is professionally installed, the installer, is responsible for ensuring that systems employing high gain directional antennas are used exclusively for fixed, point-to-point operations.

### 9.2 Measurement Procedure

The measurements are based on FCC KDB 789033 D02 General U-NII Test Procedures New Rules v02r01: E. Maximum Conducted Output Power.

### 9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
ETS-LINDGREN	Power Sensor	7002-006	160097	2018-12-31	2 year
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note1: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

#### 9.4 Test Environmental Conditions

<b>Temperature:</b>	24° C
<b>Relative Humidity:</b>	44 %
<b>ATM Pressure:</b>	102.5 KPa

*The testing was performed by Zhao Zhao on 2019-07-09 in RF site.*

## 9.5 Test Results

### 5150 - 5250 MHz

#### RADIO 2

Channel	Frequency (MHz)	Conducted Output Power (dBm)		Total (dBm)	Limit (dBm)
		ANT A	ANT B		
802.11a mode					
Low	5180	15.62	13.58	17.73	24.00
Middle	5220	15.59	13.67	17.75	24.00
High	5240	15.37	13.56	17.57	24.00
802.11n20 mode					
Low	5180	15.79	14.29	18.11	24.00
Middle	5220	15.55	14.31	17.98	24.00
High	5240	15.46	14.19	17.88	24.00
802.11ac20 mode					
Low	5180	16.41	14.81	18.69	24.00
Middle	5220	16.78	14.85	18.93	24.00
High	5240	16.69	14.97	18.92	24.00

#### RADIO 1

Channel	Frequency (MHz)	Conducted Output Power (dBm)	Limit (dBm)
802.11a mode			
Low	5180	18.63	24.00
Middle	5220	18.83	24.00
High	5240	19.09	24.00
802.11n20 mode			
Low	5180	19.17	24.00
Middle	5220	19.23	24.00
High	5240	19.18	24.00
802.11ac20 mode			
Low	5180	18.84	24.00
Middle	5220	18.95	24.00
High	5240	18.89	24.00

**5745 - 5825 MHz****RADIO 2**

Channel	Frequency (MHz)	Conducted Output Power (dBm)		Total (dBm)	Limit (dBm)
		ANT A	ANT B		
802.11a mode					
Low	5745	16.58	13.97	18.48	30
Middle	5785	15.84	13.27	17.75	30
High	5825	15.27	13.29	17.40	30
802.11n20 mode					
Low	5745	17.13	14.93	19.18	30
Middle	5785	15.29	13.05	17.32	30
High	5825	14.99	12.97	17.11	30
802.11ac20 mode					
Low	5745	16.95	14.38	18.86	30
Middle	5785	15.33	13.35	17.46	30
High	5825	15.16	13.46	17.40	30

**RADIO 1**

Channel	Frequency (MHz)	Conducted Output Power (dBm)	Limit (dBm)
802.11a mode			
Low	5745	21.91	30.00
Middle	5785	20.56	30.00
High	5825	20.19	30.00
802.11n20 mode			
Low	5745	20.84	30.00
Middle	5785	20.55	30.00
High	5825	20.24	30.00
802.11ac20 mode			
Low	5745	20.86	30.00
Middle	5785	20.53	30.00
High	5825	20.07	30.00



## 10 FCC §15.407(a) - Power Spectral Density

### 10.1 Applicable Standards

According to FCC §15.407(a):

For client devices in the 5.15-5.25 GHz band, the maximum conducted output power over the frequency band of operation shall not exceed 250 mW provided the maximum antenna gain does not exceed 6 dBi. In addition, the maximum power spectral density shall not exceed 11 dBm in any 1 megahertz band. If transmitting antennas of directional gain greater than 6 dBi are used, both the maximum conducted output power and the maximum power spectral density shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

For the 5.25-5.35 GHz and 5.47-5.725 GHz bands, the maximum conducted output power over the frequency bands of operation shall not exceed the lesser of 250 mW or  $11 \text{ dBm} + 10 \log B$ , where B is the 26 dB emission bandwidth in megahertz. In addition, the maximum power spectral density shall not exceed 11 dBm in any 1 megahertz band. If transmitting antennas of directional gain greater than 6 dBi are used, both the maximum conducted output power and the maximum power spectral density shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

For the band 5.725-5.85 GHz, the maximum conducted output power over the frequency band of operation shall not exceed 1 W. In addition, the maximum power spectral density shall not exceed 30 dBm in any 500-kHz band. If transmitting antennas of directional gain greater than 6 dBi are used, both the maximum conducted output power and the maximum power spectral density shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi. However, fixed point-to-point U-NII devices operating in this band may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter conducted power. Fixed, point-to-point operations exclude the use of point-to-multipoint systems, omnidirectional applications, and multiple collocated transmitters transmitting the same information. The operator of the U-NII device, or if the equipment is professionally installed, the installer, is responsible for ensuring that systems employing high gain directional antennas are used exclusively for fixed, point-to-point operations.

### 10.2 Measurement Procedure

The measurements are based on FCC KDB 789033 D02 General U-NII Test Procedures New Rules v02r01: F. Maximum Power Spectral Density (PSD).

### 10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-06	1 year
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note1: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

## 10.4 Test Environmental Conditions

<b>Temperature:</b>	24 °C
<b>Relative Humidity:</b>	44 %
<b>ATM Pressure:</b>	102.5 kPa

*The testing was performed by Zhao Zhao on 2019-07-09 in RF site.*

**10.5 Test Results****RADIO 2  
5150 - 5250 MHz**

Channel	Frequency (MHz)	PSD (dBm/MHz)		Total (dBm/MHz)	Limit (dBm/MHz)
		ANT A	ANT B		
802.11a mode					
Low	5180	5.463	2.720	7.31	11.00
Middle	5220	4.872	2.903	7.01	11.00
High	5240	4.473	2.381	6.56	11.00
802.11n20 mode					
Low	5180	4.787	3.311	7.12	11.00
Middle	5220	4.431	3.019	6.79	11.00
High	5240	4.073	2.830	6.51	11.00
802.11ac20 mode					
Low	5180	6.072	3.512	7.99	11.00
Middle	5220	5.700	3.609	7.79	11.00
High	5240	5.215	3.174	7.32	11.00

**RADIO 1**

Channel	Frequency (MHz)	PSD (dBm/MHz)	Limit (dBm/MHz)
802.11a mode			
Low	5180	9.396	11.00
Middle	5220	9.580	11.00
High	5240	9.492	11.00
802.11n20 mode			
Low	5180	8.963	11.00
Middle	5220	9.467	11.00
High	5240	9.321	11.00
802.11ac20 mode			
Low	5180	9.052	11.00
Middle	5220	9.313	11.00
High	5240	9.160	11.00

**RADIO 2**  
**5745 - 5825 MHz**

Channel	Frequency (MHz)	PSD (dBm/100 kHz)		Total PSD (dBm/100 kHz)	Corrected PSD Total (dBm/500 kHz)	Limit (dBm/500 kHz)
		ANT A	ANT B			
802.11a mode						
Low	5745	-3.982	-6.247	-1.96	5.03	30
Middle	5785	-4.131	-6.354	-2.09	4.90	30
High	5825	-4.204	-6.622	-2.24	4.75	30
802.11n20 mode						
Low	5745	-3.937	-6.647	-2.07	4.92	30
Middle	5785	-4.810	-7.890	-3.07	3.92	30
High	5825	-4.777	-7.617	-2.96	4.03	30
802.11ac20 mode						
Low	5745	-3.965	-6.620	-2.08	4.91	30
Middle	5785	-4.701	-7.299	-2.80	4.19	30
High	5825	-5.197	-7.176	-3.06	3.93	30

**RADIO 1**

Channel	Frequency (MHz)	PSD (dBm/MHz)	Corrected PSD Total (dBm/500 kHz)	Limit (dBm/500 kHz)
802.11a mode				
Low	5745	0.502	7.49	30
Middle	5785	0.687	7.68	30
High	5825	0.726	7.72	30
802.11n20 mode				
Low	5745	0.478	7.47	30
Middle	5785	-0.009	6.98	30
High	5825	0.145	7.13	30
802.11ac20 mode				
Low	5745	0.207	7.20	30
Middle	5785	0.063	7.05	30
High	5825	0.003	6.99	30

Note: For the 5725-5850 MHz band, the Corrected PSD (dBm/500 kHz) is equal to:  
 Correct PSD (dBm/500 kHz) = PSD (dBm/100 kHz) + Duty Cycle Correction (dB) + 10\*log(500 kHz/100 kHz)

**Please refer to Annex D for plots.**

## 11 FCC §15.407(b) - Out of Band Emissions

---

### 11.1 Applicable Standards

According to FCC §15.407(b):

For transmitters operating in the 5.15-5.25 GHz band: All emissions outside of the 5.15-5.35 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

For transmitters operating in the 5.25-5.35 GHz band: All emissions outside of the 5.15-5.35 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

For transmitters operating in the 5.47-5.725 GHz band: All emissions outside of the 5.47-5.725 GHz band shall not exceed an e.i.r.p. of  $-27$  dBm/MHz.

For transmitters operating in the 5.725-5.85 GHz band: All emissions shall be limited to a level of  $-27$  dBm/MHz at 75 MHz or more above or below the band edge increasing linearly to 10 dBm/MHz at 25 MHz above or below the band edge, and from 25 MHz above or below the band edge increasing linearly to a level of 15.6 dBm/MHz at 5 MHz above or below the band edge, and from 5 MHz above or below the band edge increasing linearly to a level of 27 dBm/MHz at the band edge.

Unwanted emissions below 1 GHz must comply with the general field strength limits set forth in §15.209. Further, any U-NII devices using an AC power line are required to comply also with the conducted limits set forth in §15.207.

The provisions of §15.205 apply to intentional radiators operating under this section.

### 11.2 Measurement Procedure

Add a correction factor (antenna gain+ Attenuator loss+cable loss) to the offset of the spectrum analyzer.  
Integration Method

1. For peak emissions measurements, follow the procedures described in section H)5), "Procedures for Peak Unwanted Emissions Measurements above 1000 MHz", except for the following changes:
  - Set RBW = 100 kHz
  - Set VBW = 3RBW
  - Perform a band-power integration across the 1 MHz bandwidth in which the band-edge emission level is to be measured. CAUTION: You must ensure that the spectrum analyzer or EMI receiver is set for peak-detection and max-hold for this measurement.
2. For average emissions measurements, follow the procedures described in section H)6), "Procedures for Average Unwanted Emissions Measurements above 1000 MHz", except for the following changes:
  - Set RBW = 100 kHz
  - Set VBW = 3RBW
  - Perform a band-power integration across the 1 MHz bandwidth in which the band-edge emission level is to be measured.

### 11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2019-03-06	1 year
Rohde & Schwarz	Analyzer, Spectrum	FSQ26	200749	2019-03-14	2 years
-	RF cable	-	-	Each time <sup>1</sup>	N/A
-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A

Note1: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

### 11.4 Test Environmental Conditions

<b>Temperature:</b>	24 °C
<b>Relative Humidity:</b>	44 %
<b>ATM Pressure:</b>	102.5 kPa

*The testing was performed by Zhao Zhao on 2019-07-09 in RF site.*

### 11.5 Test Results

Compliant

**Please refer to Annex D for plots.**

---

## **12 Annex A (Normative) – EUT Test Setup Photographs**

---

Please see attachments:

---

## **13 Annex B (Normative) – EUT External Photographs**

---

Please see attachments:



---

## **14 Annex C (Normative) – EUT Internal Photographs**

---

Please see attachments:

---

## **15 Annex D - Plots**

---

Please see attachments:

- Appendix B – Occupied Bandwidth
- Appendix C – Spurious Emissions at Antenna Port
- Appendix D – Power Spectral Density
- Appendix E – Band Edge

# 16 Annex E (Normative) - A2LA Electrical Testing Certificate



## Accredited Laboratory

A2LA has accredited

### BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

### Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 General requirements for the competence of testing and calibration laboratories. This laboratory also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 2<sup>nd</sup> day of October 2018.

Vice President, Accreditation Services  
For the Accreditation Council  
Certificate Number 3297.02  
Valid to September 30, 2020  
Revised June 5, 2019

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---