



MET Laboratories, Inc. *Safety Certification - EMI - Telecom Environmental Simulation*
914 WEST PATAPSCO AVENUE • BALTIMORE, MARYLAND 21230 • PHONE (410) 354-3300 • FAX (410) 354-3313

October 31, 2008

Spirent Comm.
20324 Seneca Meadows Parkway
Germantown, MD 20876

Dear Enio Montenegro,

Enclosed is the EMC Wireless test report for compliance testing of the Spirent Comm., Tech-X-Flex as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15, Subpart B for a Class A Digital Device and FCC Part 15 Subpart C.

Thank you for using the services of MET Laboratories, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
MET LABORATORIES, INC.

Jennifer Warnell
Documentation Department

Reference: (\Spirent Comm.\EMC25550-FCC247 Rev. 2)

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Electromagnetic Compatibility Criteria Test Report

for the

**Spirent Comm.
Model Tech-X-Flex**

Tested under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B
for Class A Digital Devices
&
15.247 Subpart C

MET Report: EMC25550-FCC247 Rev. 2

October 31, 2008

Prepared For:

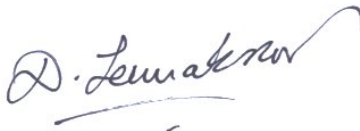
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for Class A Digital Devices
&
15.247 Subpart C



Dusmantha Tennakoon
Project Engineer



Jennifer Warnell
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Parts 15B, 15.247 under normal use and maintenance.



Shawn McMillen
Wireless Manager, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	October 16, 2008	Initial Issue.
1	October 23, 2008	Customer correction
2	October 31, 2008	Corrections per engineer comments.

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List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current μ
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GR-1089-CORE	(GR) General Requirement(s) imposed by the NEBS standard, (CORE) Central Office Recovery Express (AT&T), (1089) specifies various parts of the General Requirements under Bellcore Technical Standard, Requirements for Electromagnetic Compatibility and Electrical Safety - Generic Criteria for Network Telecommunications Equipment
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μH	microhenry
μ	microfarad
μs	microseconds
NEBS	Network Equipment-Building System
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Spirent Comm. Tech-X-Flex, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the Tech-X-Flex. Spirent Comm. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the Tech-X-Flex, has been **permanently** discontinued

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with Spirent Comm., purchase order number 61860. All tests were conducted using measurement procedure ANSI C63.4-2003.

FCC Reference	Description	Compliance
47 CFR Part 15.247:2005	Applicable Standard	Compliant
Title 47 of the CFR, Part 15 §15.203	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.205	Emissions at Restricted Band	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	Conducted Emission Voltage	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	RF Output Power	Compliant
Title 47 of the CFR, Part 15 §15.209, §15.247(d)	Radiated and Conducted Spurious Emissions	Compliant
Title 47 of the CFR, Part 15; §15.247(e)	Power Spectral Density	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	Maximum Permissible Exposure	Compliant

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by Spirent Comm. to perform testing on the Tech-X-Flex, under Spirent Comm.'s purchase order number 61860.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Spirent Comm., Tech-X-Flex.

The results obtained relate only to the item(s) tested.

Model(s) Tested:	Tech-X-Flex	
Model(s) Covered:	Tech-X-Flex	
EUT Specifications:	Primary Power: 100 - 220 VAC, 50/60 Hz	
	FCC ID: WR2-TECH-X-FLEX	
	Type of Modulations:	DSSS (Direct Sequence Spread Spectrum)
	Equipment Code:	DTS
	Peak RF Output Power:	17.75 dBm
	EUT Frequency Ranges:	2412 – 2462 MHz
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature: 15-35° C	
	Relative Humidity: 30-60%	
	Barometric Pressure: 860-1060 mbar	
Evaluated by:	Dusmantha Tennakoon	
Date(s):	October 16, 2008	

Table 2. EUT Summary Table

B. References

CFR 47, Part 15, Subpart C	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
RSS-210, Issue 7, June 2007	Low-power Licence-exempt Radiocommunications Devices (All Frequency Bands): Category I Equipment
CFR 47, Part 15, Subpart B	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ICES-003, Issue 4 February 2004	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ANSI C63.4:2003	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ANSI/NCSL Z540-1-1994	Calibration Laboratories and Measuring and Test Equipment - General Requirements
ANSI/ISO/IEC 17025:2000	General Requirements for the Competence of Testing and Calibration Laboratories

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 914 W. Patapsco Ave., Baltimore, MD 21230. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 3 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

D. Description of Test Sample

The Spirent Comm. Tech-X-Flex, is a field tester. It is used to troubleshoot IP services. The device has a built-in 802.11b radio.



Photograph 1. Spirent Comm. Tech-X-Flex

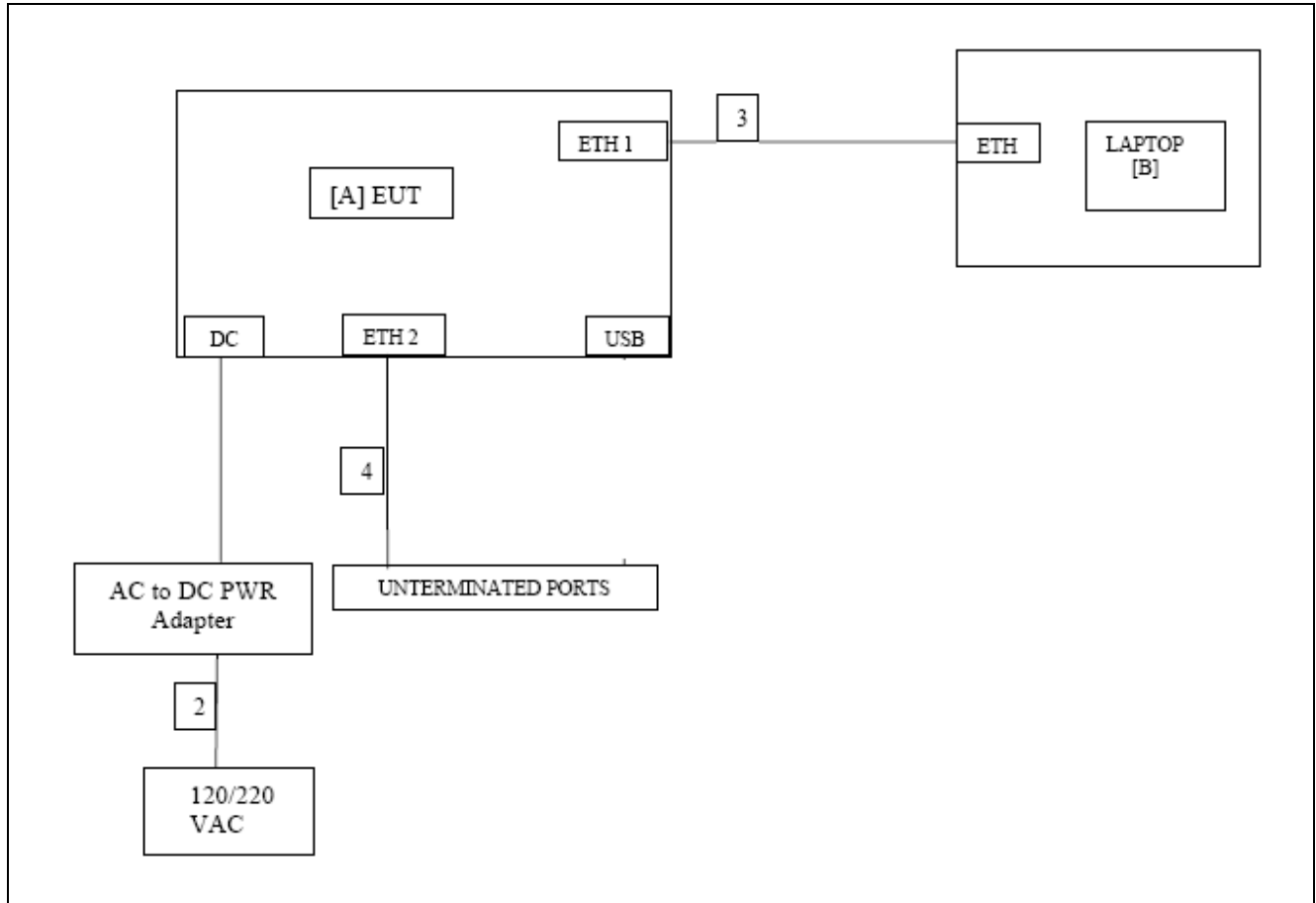


Figure 1. Block Diagram of Test Configuration

Note: USB port will not be used by end users. It is only for diagnostics at the factory.

E. Equipment Configuration

The EUT was set up as outlined in Figure 1, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

Ref. ID	Name / Description	Model Number	Part Number	Serial Number	Rev. #
A	TECH-X-FLEX	TECH-X-FLEX	N/A	N/A	N/A

Table 4. Equipment Configuration

F. Support Equipment

Spirent Comm. supplied support equipment necessary for the operation and testing of the Tech-X-Flex. All support equipment supplied is listed in the following Support Equipment List.

Ref. ID	Name / Description	Manufacturer	Model Number	*Customer Supplied Calibration Data
B	LAPTOP	DELL	LATITUDE D600	NA

Table 5. Support Equipment

* The 'Customer Supplied Calibration Data' column will be marked as either not applicable, not available, or will contain the calibration date supplied by the customer.

G. Ports and Cabling Information

Ref. ID	Port name on EUT	Cable Description or reason for no cable	Qty	Length as tested (m)	Max Length (m)	Shielded? (Y/N)	Termination Box ID & Port Name
2	AC POWER	3 CONDUCTOR, 18 AWG	1	2	2	NO	AC
3	ETH 1	ETHERNET CABLE	1	10	10	NO	LAPTOP ETHERNET
4	ETH 2	ETHERNET CABLE	1	10	10	NO	UNTERMINATED

Table 6. Ports and Cabling Information

H. Mode of Operation

Un-intentional Testing: The EUT was pinged continuously from a laptop via Ethernet connection.

Intentional Testing: The radio was enabled to transmit continuously during testing.

I. Modifications

a) Modifications to EUT

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the test standard.

J. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Spirent Comm. upon completion of testing.

III. Electromagnetic Compatibility Criteria for Unintentional Radiators

Electromagnetic Compatibility Criteria

§ 15.107 Conducted Emissions Limits

Test Requirement(s): **15.107 (a)** Except for Class A digital devices, for equipment 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 Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals.

15.107 (b) For a Class A digital device 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 Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals. The lower limit applies at the band edges.

15.207(a), Except as shown in paragraphs (b) and (c) of this section*, charging, AC adapters or battery eliminators 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 Table 7, as measured using a 50 μ 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 range (MHz)	Class A Conducted Limits (dB μ V)		*Class B Conducted Limits (dB μ V)	
	Quasi-Peak	Average	Quasi-Peak	Average
* 0.15- 0.45	79	66	66 - 56	56 - 46
0.45 - 0.5	79	66	56	46
0.5 - 30	73	60	60	50

Note 1 — The lower limit shall apply at the transition frequencies.
 Note 2 — The limit decreases linearly with the logarithm if the frequency in the range 0.15 MHz to 0.5 MHz.
 * -- Limits per Subsection 15.207(a).

Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)

Test Results: The EUT was found compliant with the Class B requirement(s) of this section. Measured emissions were below applicable limits. The batteries were charging during the conducted emissions testing.

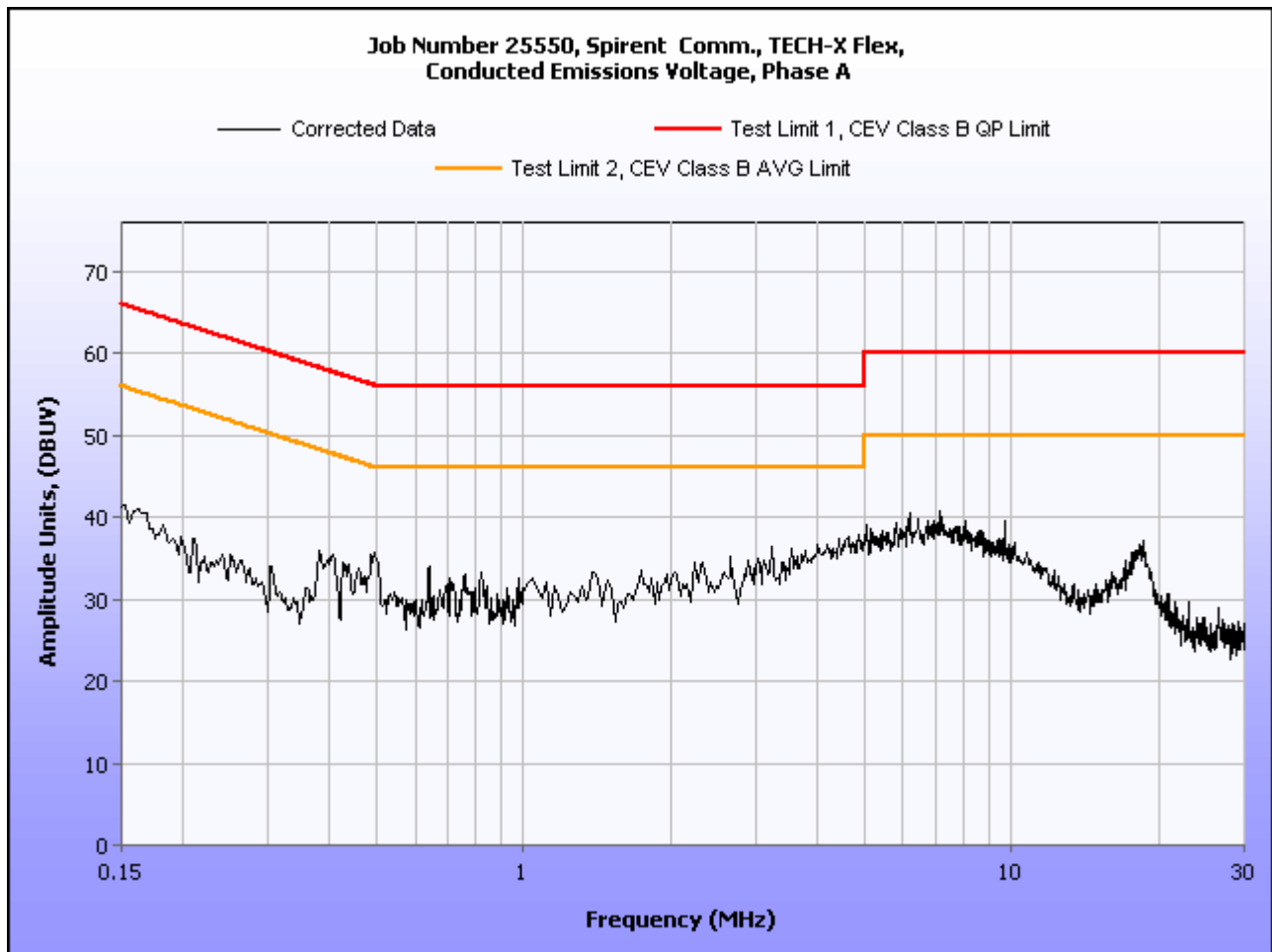
Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/25/08

Conducted Emissions - Voltage, AC Power, Phase Line (120 VAC, 60 Hz)

FREQ. (MHz)	Corrected Amplitude (dBuV) QP	Limit (dBuV) QP	Margin (dB) QP	Corrected Amplitude (dBuV) AVG	Limit (dBuV) AVG	Margin (dB) AVG
0.151	23.9967	65.95	-41.9533	14.1667	55.95	-41.7833
0.1975	20.26575	63.72	-43.4543	7.84675	53.72	-45.8733
7.15	30.938	60	-29.062	24.678	50	-25.322
18.43	28.38	60	-31.62	22.41	50	-27.59
0.4265	29.29	57.32	-28.03	17.46	47.32	-29.86
0.3943	24.94	57.97	-33.03	14.56	47.97	-33.41

Table 8. Conducted Emissions - Voltage, AC Power, Phase Line (120 VAC, 60 Hz)

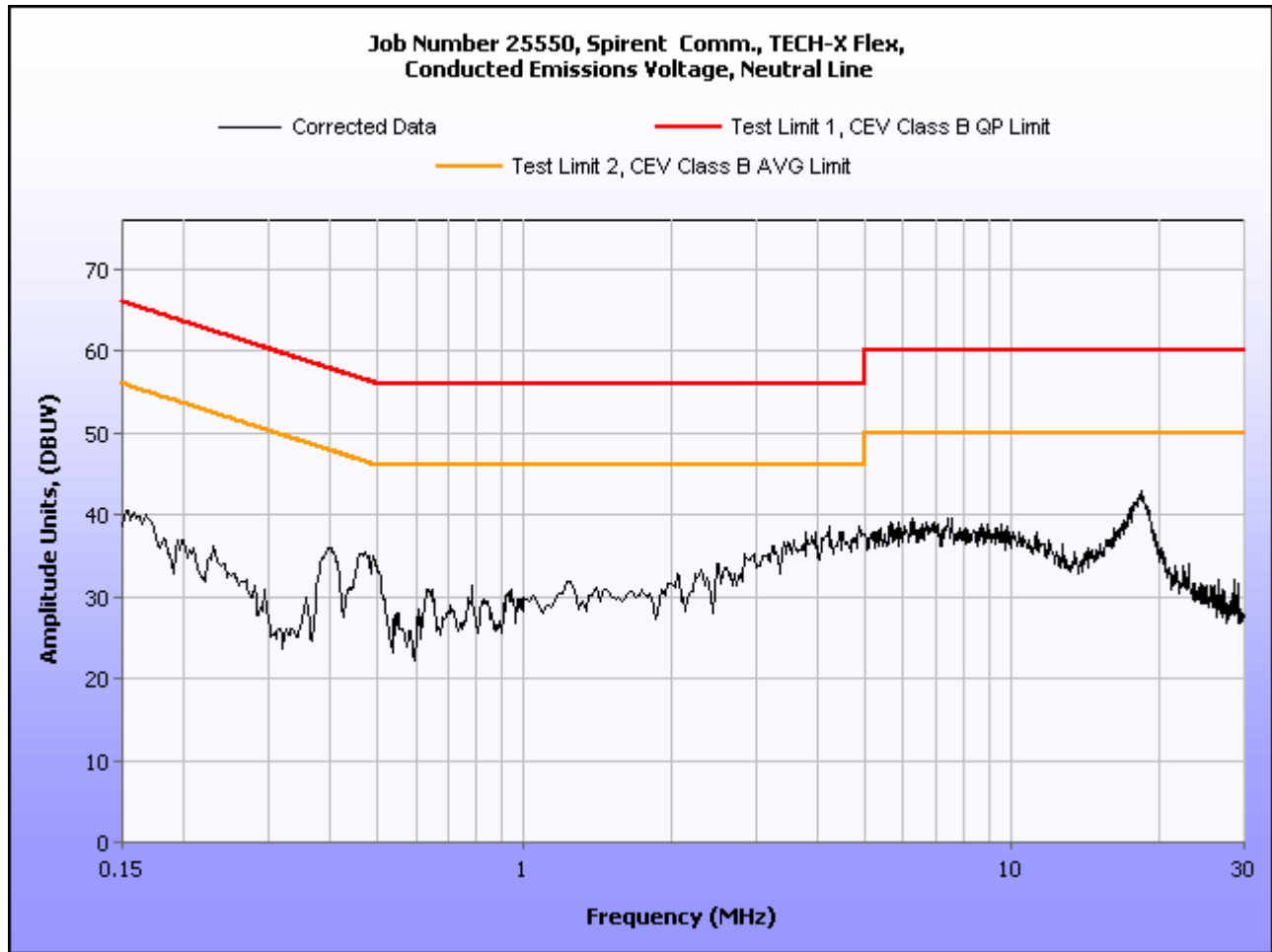


Plot 1. Conducted Emissions, Phase Line Plot

Conducted Emissions - Voltage, AC Power, Neutral Line (120 VAC, 60 Hz)

FREQ. (MHz)	Corrected Amplitude (dBuV) QP	Limit (dBuV) QP	Margin (dB) QP	Corrected Amplitude (dBuV) AVG	Limit (dBuV) AVG	Margin (dB) AVG
0.1514	28.14738	65.92	-37.7726	21.67738	55.92	-34.2426
0.4	24.21	57.85	-33.64	15.46	47.85	-32.39
0.4265	34.11	57.32	-23.21	24.89	47.32	-22.43
7.45	30.274	60	-29.726	25.644	50	-24.356
18.4	36.03	60	-23.97	32.3	50	-17.7
0.383	29.33	58.21	-28.88	22.53	48.21	-25.68

Table 9. Conducted Emissions - Voltage, AC Power, Neutral Line (120 VAC, 60 Hz)



Plot 2. Conducted Emissions, Neutral Line Plot

Conducted Emission Limits Test Setup



Photograph 2. Conducted Emissions Test Setup

Radiated Emission Limits

§ 15.109 Radiated Emissions Limits

Test Requirement(s): **15.109 (a)** Except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the Class B limits expressed in Table 10.

15.109 (b) The field strength of radiated emissions from a Class A digital device, as determined at a distance of 10 meters, shall not exceed the Class A limits expressed in Table 10.

Frequency (MHz)	Field Strength (dB μ V/m)	
	§15.109 (b), Class A Limit (dB μ V) @ 10m	§15.109 (a), Class B Limit (dB μ V) @ 3m
30 - 88	39.00	40.00
88 - 216	43.50	43.50
216 - 960	46.40	46.00
Above 960	49.50	54.00

Table 10. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b)

Test Procedures: The EUT was placed on a 0.8m-high wooden table inside a semi-anechoic chamber. The method of testing and test conditions of ANSI C63.4 were used. An antenna was located 3 m from the EUT on an adjustable mast. A pre-scan was first performed in order to find prominent radiated emissions. For final emissions measurements at each frequency of interest, the EUT was rotated and the antenna height was varied between 1 m and 4 m in order to maximize the emission. Measurements in both horizontal and vertical polarities were made and the data was recorded. Unless otherwise specified, measurements were made using a quasi-peak detector with a 120 kHz bandwidth.

Test Results: The EUT was found to comply with the Class A requirement(s) of this section. Measured emissions were below applicable limits. The batteries were charging during this test requirement.

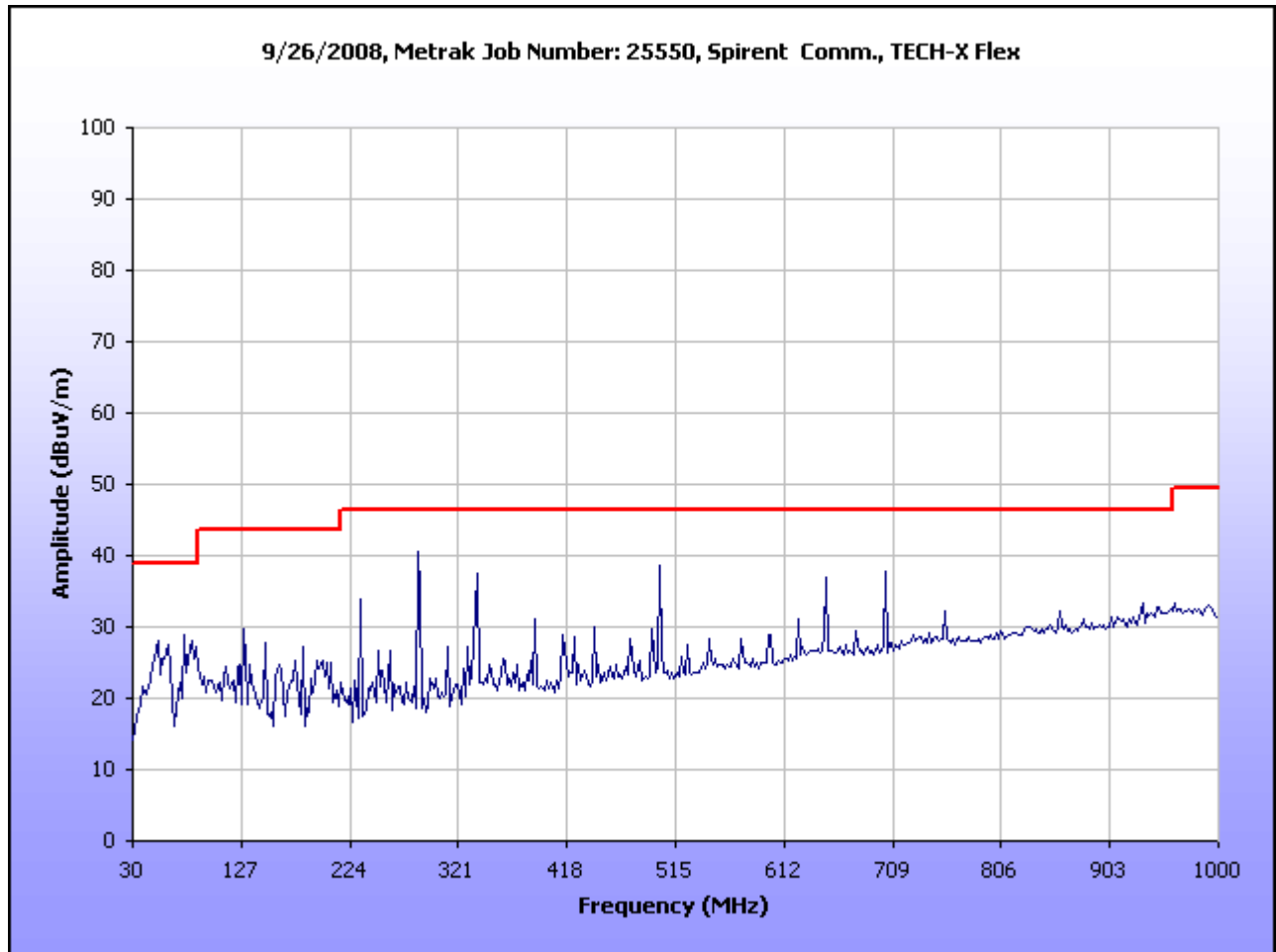
Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/26/08

Radiated Emissions Limits Test Results, Class A

Frequency (MHz)	EUT Azimuth (Degrees)	Antenna Polarity (H/V)	Antenna HEIGHT (m)	Uncorrected Amplitude (dBuv)	Antenna Correction Factor (dB) (+)	Cable Loss (dB) (+)	Distance Correction Factor (dB) (-)	Corrected Amplitude (dBuv)	Limit (dBuv)	Margin (dB)
233.977	105	H	1.16	29.09	10.96	0.96	10.46	30.55	46.40	-15.85
233.977	141	V	1.00	32.43	11.50	0.96	10.46	34.43	46.40	-11.97
285.973	76	H	1.16	37.46	12.84	1.40	10.46	41.24	46.40	-5.16
285.973	264	V	1.00	29.64	12.16	1.40	10.46	32.74	46.40	-13.66
337.963	258	H	1.16	30.92	14.02	1.62	10.46	36.09	46.40	-10.31
337.963	122	V	1.69	29.49	14.62	1.62	10.46	35.26	46.40	-11.14
500.012	204	H	1.91	32.29	17.30	2.27	10.46	41.40	46.40	-5.00
500.012	22	V	1.00	31.67	17.30	2.27	10.46	40.78	46.40	-5.62
649.942	219	H	2.47	25.10	20.30	2.52	10.46	37.46	46.40	-8.94
649.942	28	V	1.00	23.99	20.10	2.52	10.46	36.15	46.40	-10.25
701.950	227	H	1.16	23.32	20.34	2.56	10.46	35.76	46.40	-10.64
701.950	0	V	1.82	20.69	20.54	2.56	10.46	33.33	46.40	-13.07

Table 11. Radiated Emissions Limits Test Results, 30 MHz – 1GHz



Plot 3. Radiated Emissions, Pre-Scan

Radiated Emission Limits Test Setup



Photograph 3. Radiated Emission Test Setup 30 MHz - 1 GHz

IV. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.203 Antenna Requirement

Test Requirement: § 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

Results: The antenna connector on EUT is Reverse SMA. The EUT is therefore compliant with §15.203.

Gain/Model	Model #	Manufacturer
1.8 dBi	GW-11	Taoglas

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/26/08



Photograph 4. Antenna Connector

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207 Conducted Emissions Limits

Test Requirement(s): § 15.207 (a): 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 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω 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 frequency ranges.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB μ V)	
	Quasi-Peak	Average
* 0.15- 0.45	66 - 56	56 - 46
0.45 - 0.5	56	46
0.5 - 30	60	50

Table 12. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Procedure: The EUT was placed on a 0.8 m-high wooden table inside a semi-anechoic chamber. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50 Ω /50 μ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with *ANSI C63.4-2003 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz"*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50 Ω /50 μ H LISN as the input transducer to an EMC/field intensity meter. The tests were conducted in a RF-shielded enclosure.

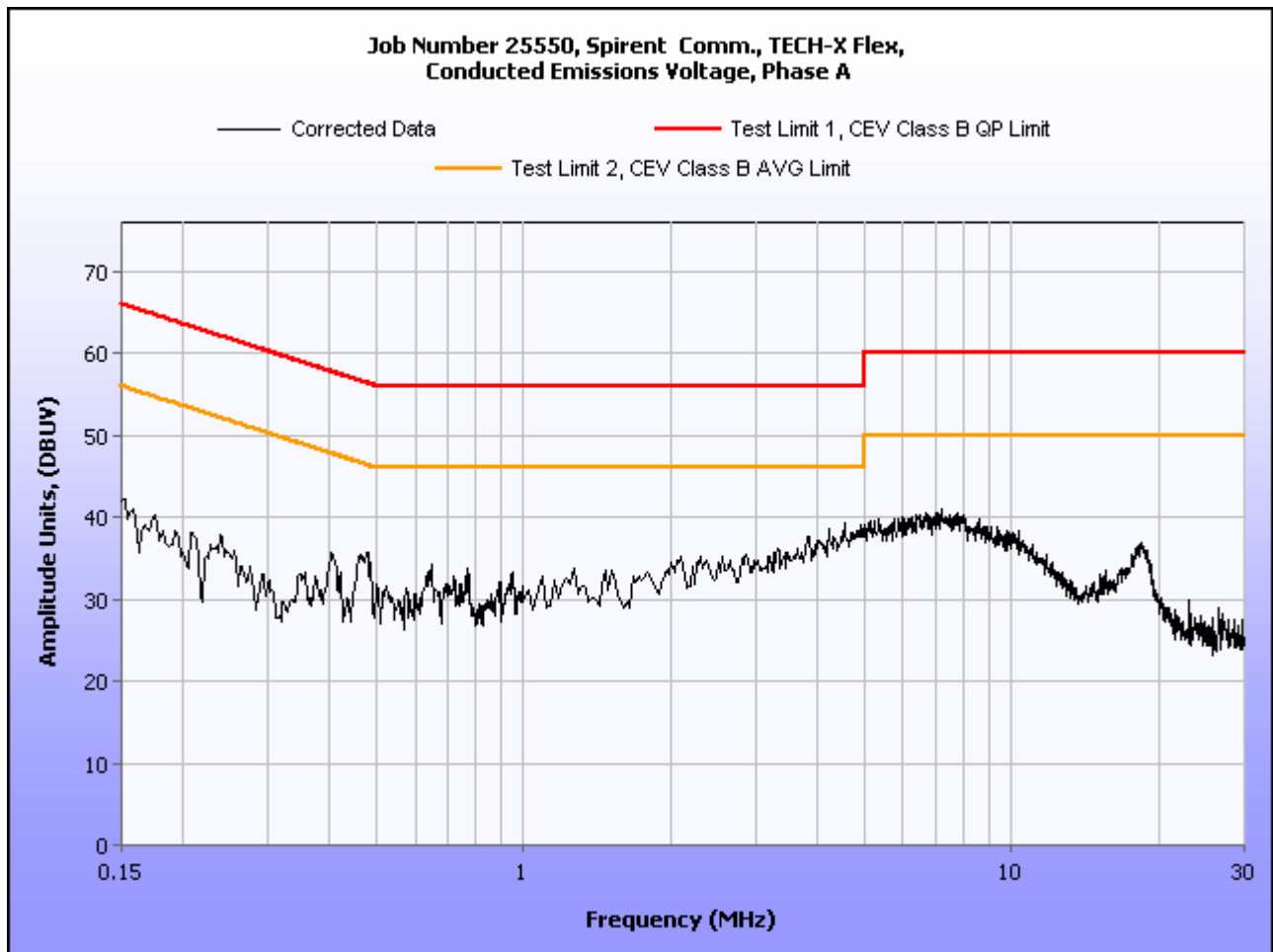
Test Results: The EUT is compliant with this requirement. Pre-scans revealed that the emissions are similar for channels 1, 6, and 11. Therefore, final measurements were only made on channel 6.

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/25/08

Frequency (MHz)	Corrected Measurement (dBuV) QP	Limit (dBuV) QP	Margin (dB) QP	Corrected Measurement (dBuV) AVG	Limit (dBuV) AVG	Margin (dB) AVG
0.1522	30.67874	65.88	-35.2013	20.42874	55.88	-35.4513
0.2297	25.55	62.46	-36.91	20.02	52.46	-32.44
0.3475	18.72	59.02	-40.3	9.758	49.02	-39.262
0.441	27.47	57.04	-29.57	15.82	47.04	-31.22
6.85	30.07	60	-29.93	24	50	-26
18.27	27.98	60	-32.02	22.09	50	-27.91

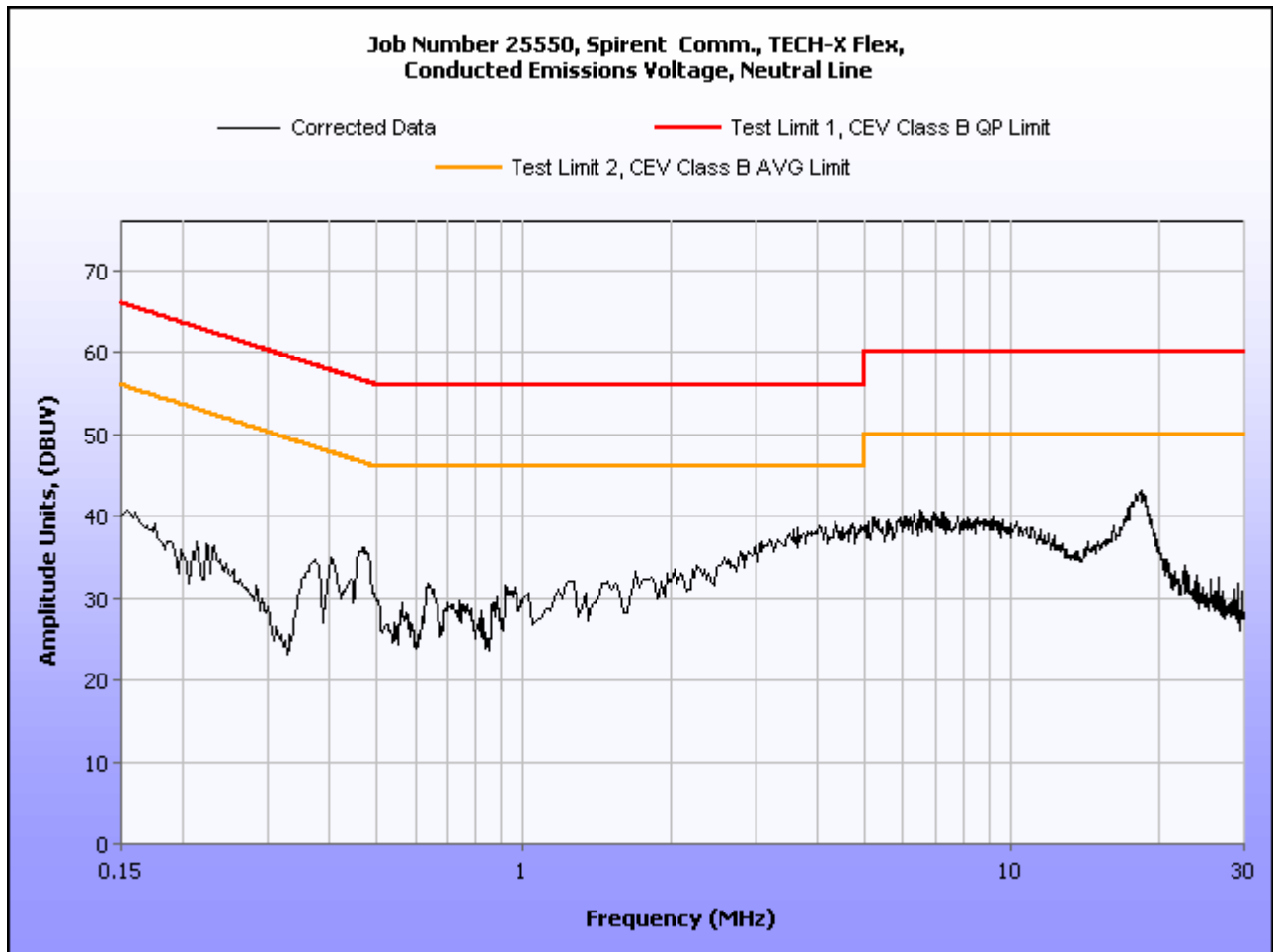
Table 13. Conducted Emissions, Phase Line, Test Results



Plot 4. Conducted Emissions, Phase Line Plot

Frequency (MHz)	Corrected Measurement (dBuV) QP	Limit (dBuV) QP	Margin (dB) QP	Corrected Measurement (dBuV) AVG	Limit (dBuV) AVG	Margin (dB) AVG
0.1514	31.68738	65.92	-34.2326	23.62738	55.92	-32.2926
0.2075	28.13	63.31	-35.18	11.73	53.31	-41.58
0.3982	29.37	57.89	-28.52	21.17	47.89	-26.72
0.439	32.19	57.08	-24.89	26.88	47.08	-20.2
7.7	29.56733333	60	-30.4327	25.17733333	50	-24.8227
18.4	36.07	60	-23.93	32.05	50	-17.95

Table 14. Conducted Emissions, Neutral Line, Test Results



Plot 5. Conducted Emissions, Neutral Line Plot



Photograph 5. Conducted Emissions, Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a) 6 dB and 99% Bandwidth

Test Requirements: § 15.247(a): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

Test Procedure: The transmitter was set to the mid channel at the highest output power and connected to the spectrum analyzer through an attenuator. The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately 1% of the total emission bandwidth, VBW > RBW. The 6 dB Bandwidth was measured and recorded. The measurements were repeated at the low, mid and high channels.

Test Results Equipment complies with § 15.247 (a). The 6 dB and 99% Bandwidth was determined from the plots on the following pages.

802.11b mode			
Carrier Channel	Frequency (MHz)	Measured 6 dB Bandwidth (MHz)	Measured 99% Bandwidth (MHz)
Low	2412	8.98	15.46
Mid	2437	9.57	15.52
High	2462	9.07	15.41

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/26/08

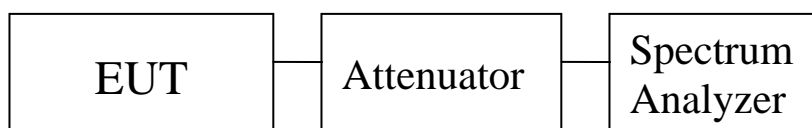
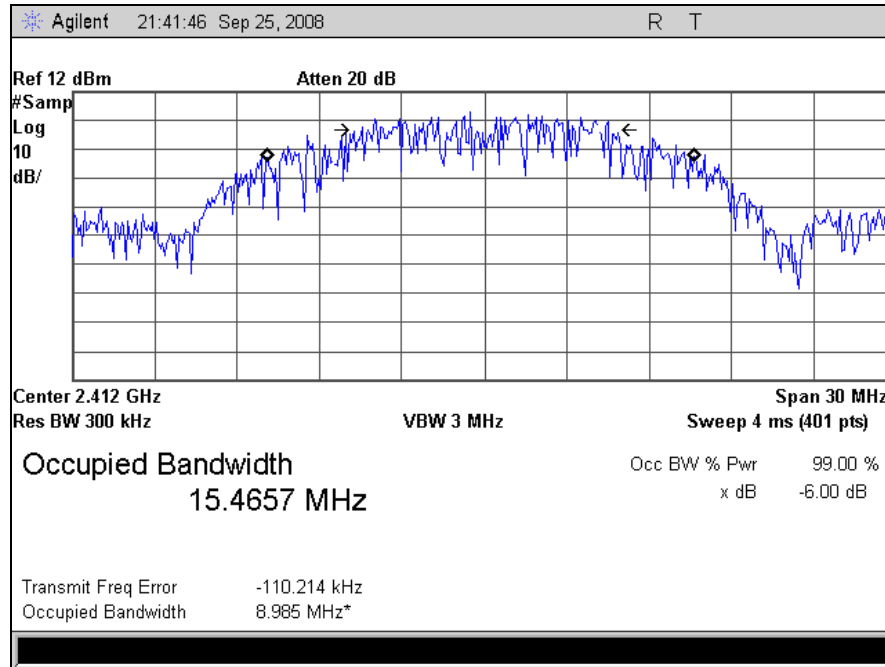
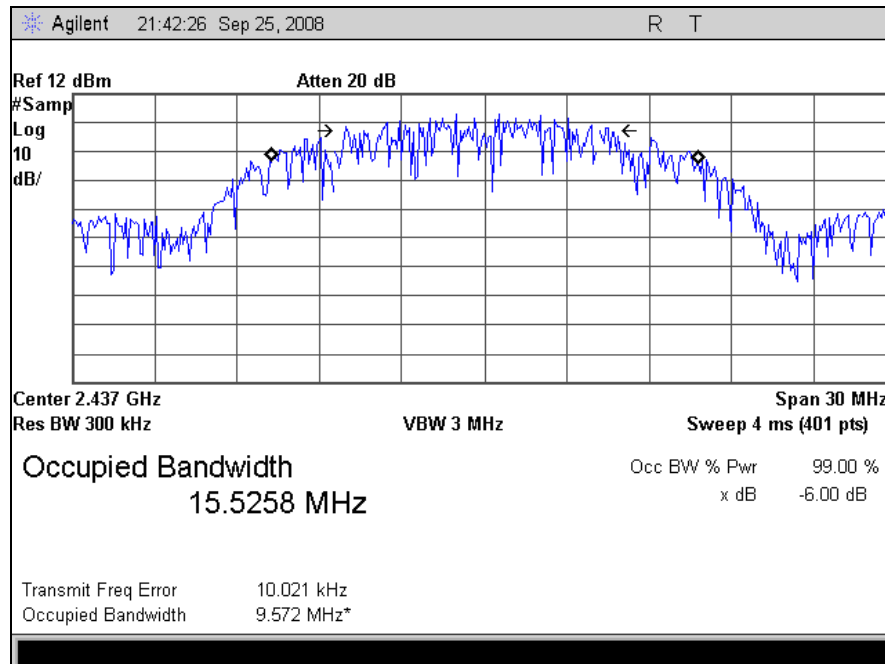


Figure 2. Occupied Bandwidth Test Setup

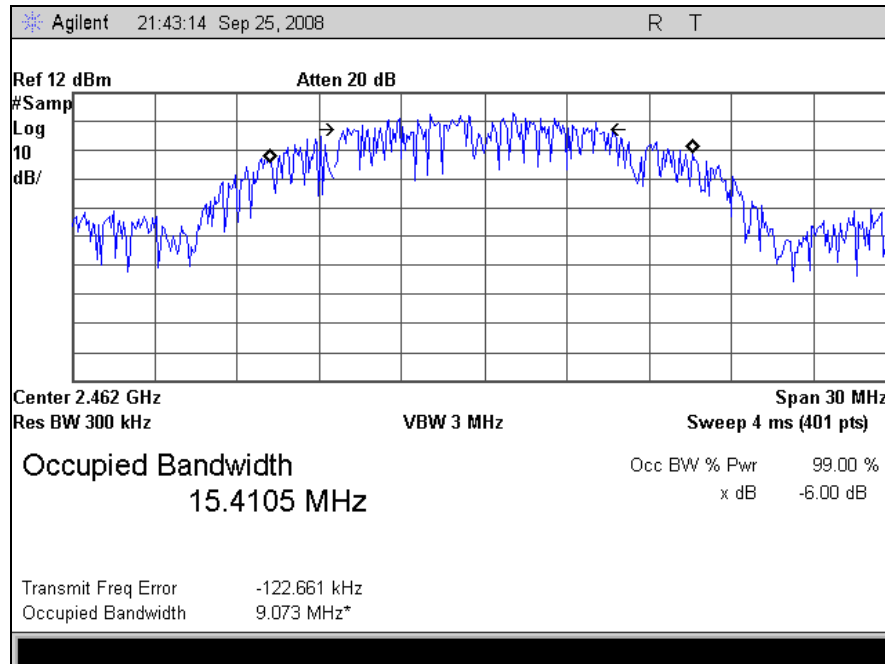
Electromagnetic Compatibility Criteria for Intentional Radiators



Plot 6. Occupied Bandwidth, Low Channel



Plot 7. Occupied Bandwidth, Mid Channel



Plot 8. Occupied Bandwidth, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output and RF Exposure

Test Requirements: §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

Digital Transmission Systems (MHz)	Output Limit (Watts)
902-928	1.000
2400-2483.5	1.000
5725- 5850	1.000

Table 15. Output Power Requirements from §15.247

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values in the Table 15, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

Fixed, point-to-point operation excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

Test Procedure: The transmitter was connected to a calibrated Spectrum Analyzer. The EUT was measured at the low, mid and high channels of each band at a data rate which gave the maximum power level.

Test Results: Equipment complies with the Peak Power Output limits of § 15.247(b).

802.11b		
Carrier Channel	Frequency (MHz)	Measured Peak Output Power dBm
Low	2412	17.75
Mid	2437	17.65
High	2462	17.35

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 09/26/08

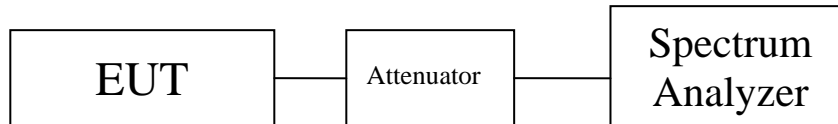
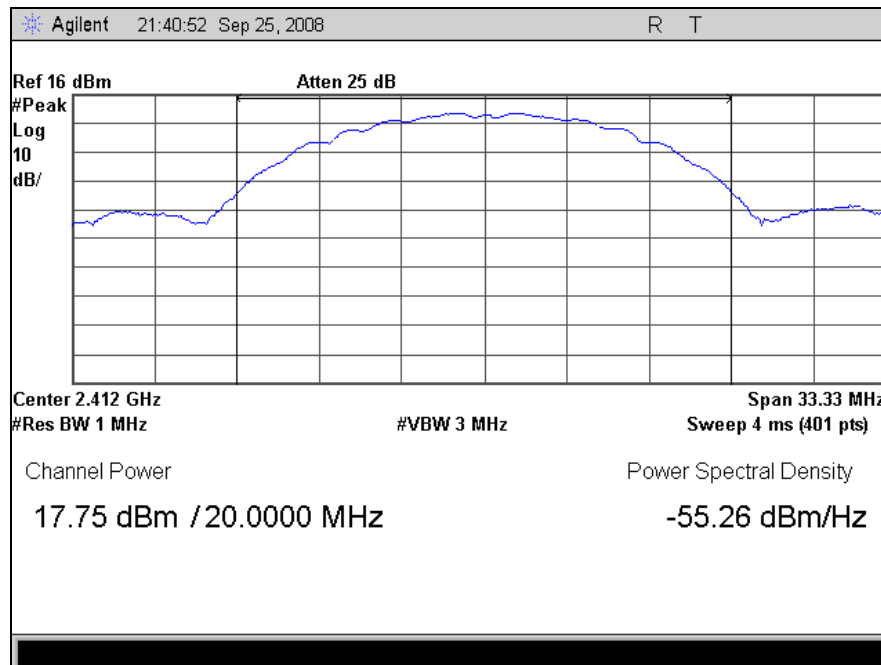
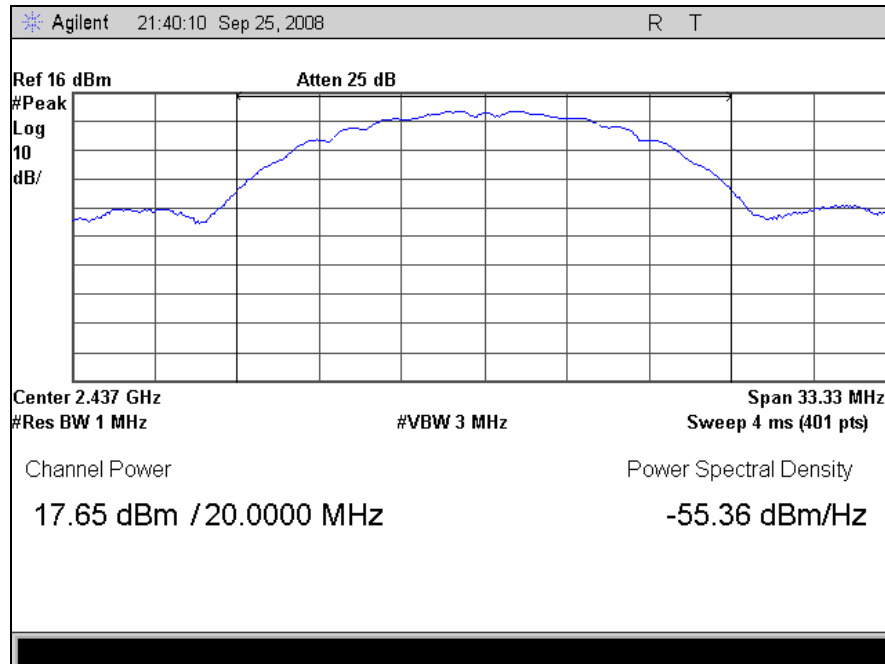


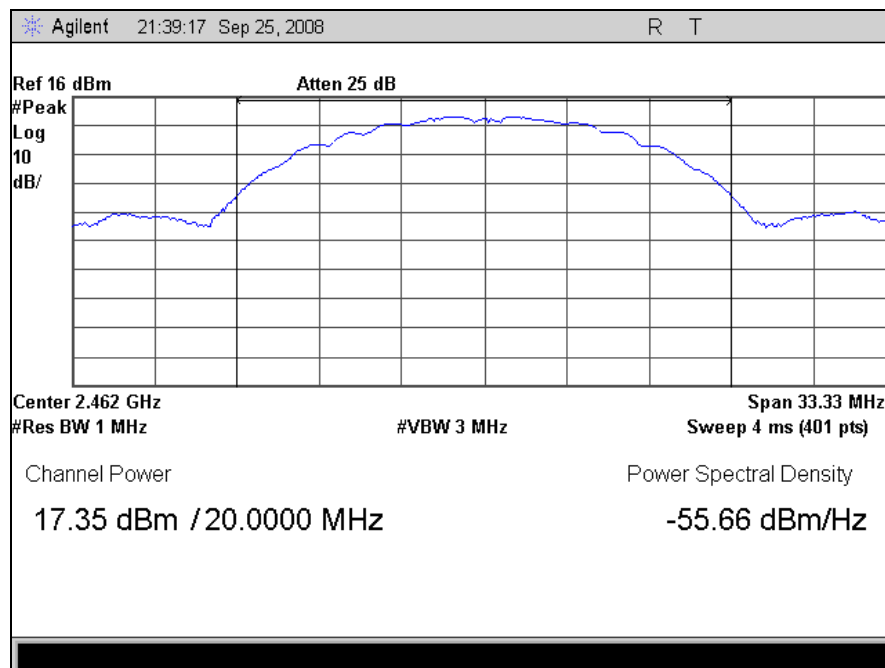
Figure 3. Peak Power Output Test Setup



Plot 9. Peak Power Output, Low Channel



Plot 10. Peak Power Output, Mid Channel



Plot 11. Peak Power Output, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output and RF Exposure

RF Exposure Requirements: §1.1307(b)(1) and §1.1307(b)(2): 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 levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: §1.1310: As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

MPE Limit Calculation: EUT's operating frequencies between 2412 and 2462 MHz; Highest conducted peak power = 17.75 dBm. Therefore, **Limit for Uncontrolled exposure: 1 mW/cm²**.

Highest gain antenna used = 1.8 dBi

Equation from page 18 of OET 65, Edition 97-01

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

where,

S = Power Density (mW/m²)

P = Power (mW)

G = numerical gain of antenna

R = Distance to the center of radiation of the antenna (20 cm for Mobile minimum distance)

$$P = 59.7 \text{ mW}$$

$$G = 1.5$$

$$S = 59.7 * 1.5 / 4(3.1416)(20)^2$$

$$S = 0.018 \text{ mW/cm}^2$$

Therefore, EUT meets the Uncontrolled Exposure limit.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Harmonic Emissions – Radiated

Test Requirements: §15.247(d); §15.205: Emissions outside the frequency band.

§15.247(d): In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. Attenuation below the general limits specified in § 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in § 15.205(a), must also comply with the radiated emission limits specified in § 15.209(a).

§15.205(a): Except as shown 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	399.9–410	4.5–5.15
¹ 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358.36	43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	(²)

Table 16. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

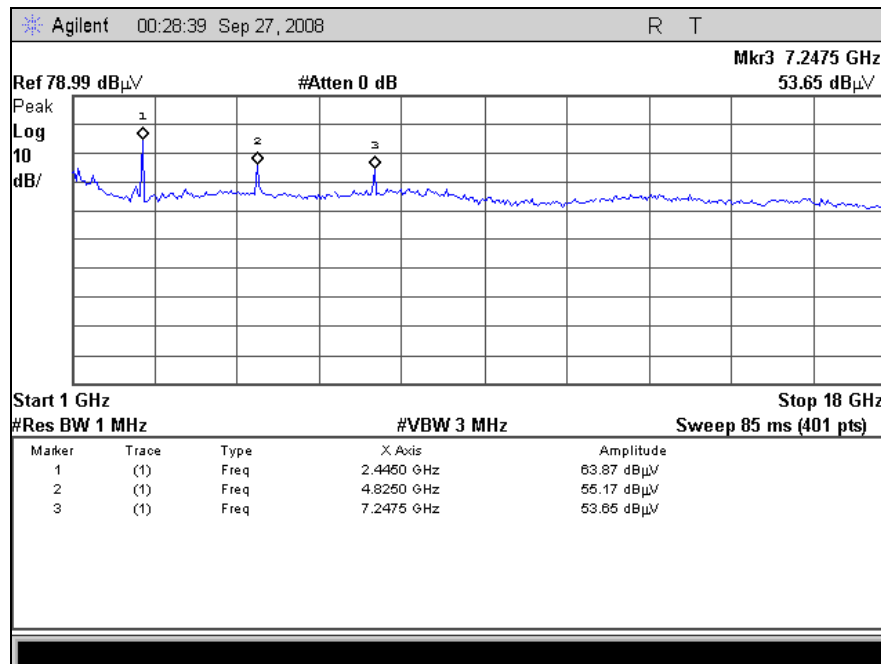
Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Harmonic Emissions Requirements – Radiated (802.11b)

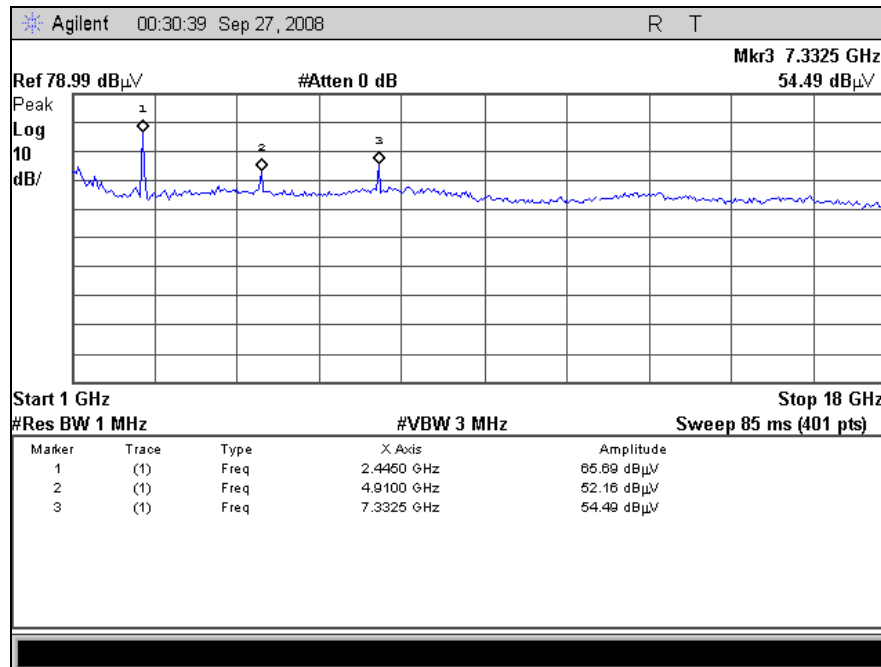
Channel	Frequency (GHz)	Final measurement corrected for cable loss, preamp, ACF and distance (dBuV/m)	Limit (dBuV/m)	Remark	Pass/Fail
1	4.824	53.12	74	Peak	Pass
	4.824	47.6	54	Avg	Pass
	7.236	52.44	<20 dBc	Peak	Pass
	9.648	35.15	<20 dBc	Peak	Pass
6	4.874	49.41	74	Peak	Pass
	4.874	44.9	54	Avg	Pass
	7.311	54.56	74	Peak	Pass
	7.311	48.39	54	Avg	Pass
	9.76	36.26	<20 dBc	Peak	Pass
11	4.924	47.38	74	Peak	Pass
	4.924	43.61	54	Avg	Pass
	7.386	55.84	74	Peak	Pass
	7.386	50.04	54	Avg	Pass
	9.848	36.09	<20 dBc	Peak	Pass

Table 17. Harmonic Emissions – Radiated, Test Results

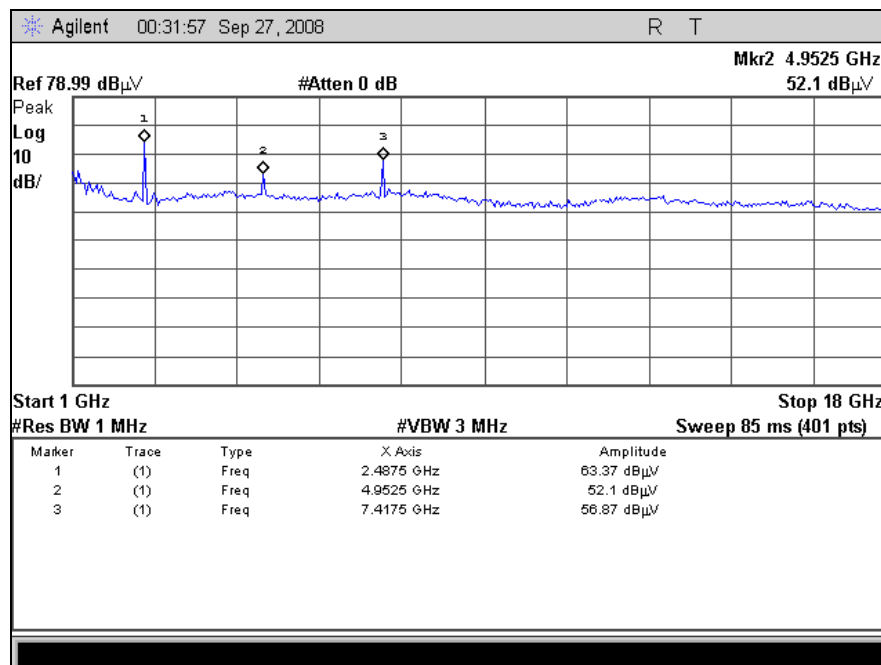
Note: All other emissions were measured at the noise floor of the spectrum analyzer.



Plot 12. Harmonics, Low Channel



Plot 13. Harmonics, Mid Channel



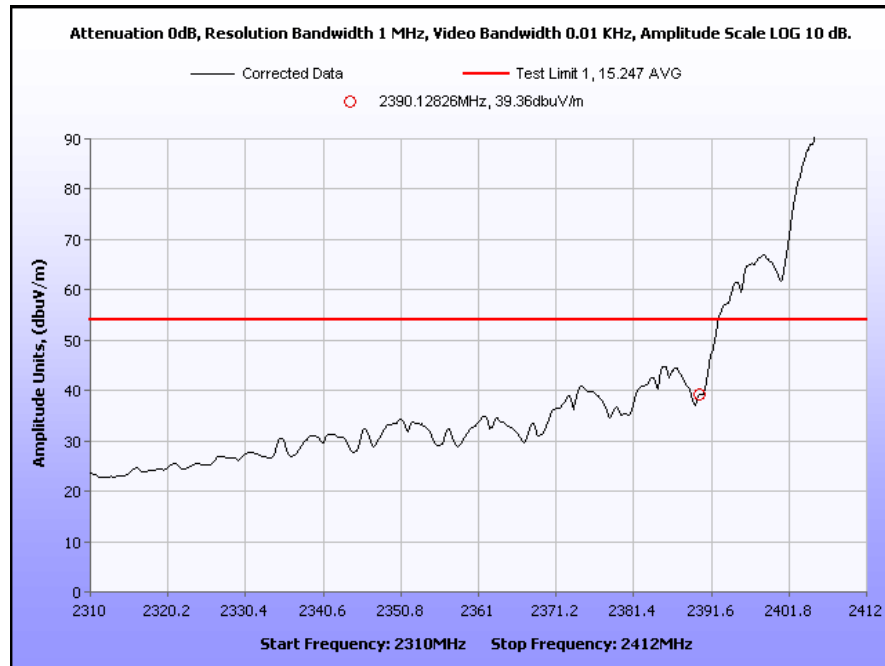
Plot 14. Harmonics, High Channel



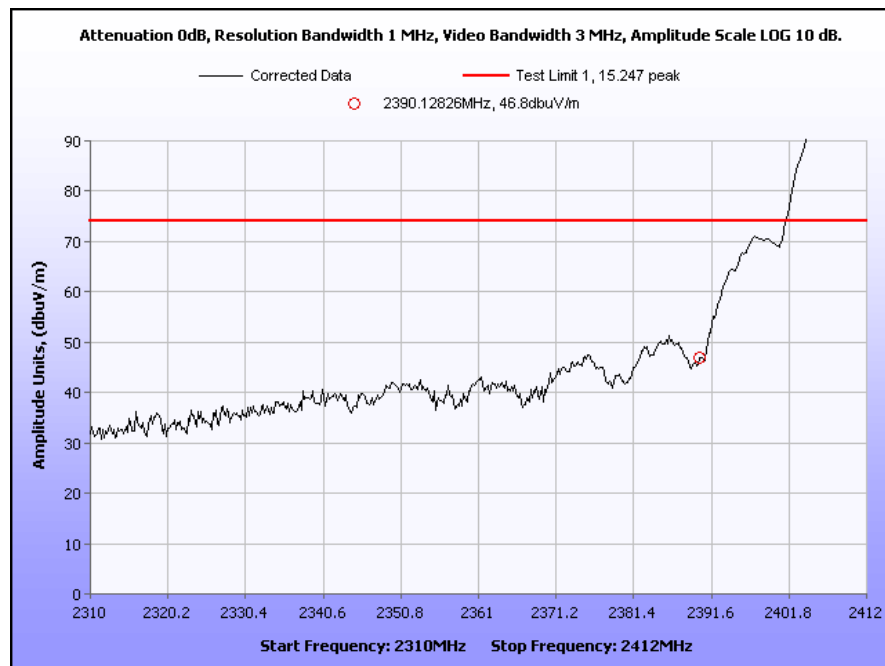
Photograph 6. Test Equipment and setup for various Radiated Measurements

Electromagnetic Compatibility Criteria for Intentional Radiators

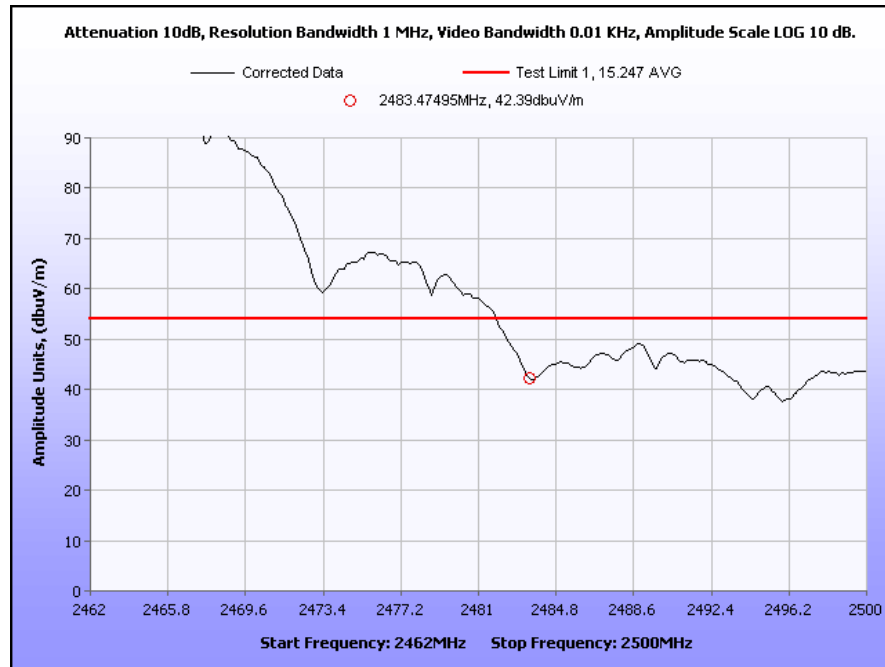
§ 15.247 Spurious Emissions Requirements –Band Edge (Radiated)



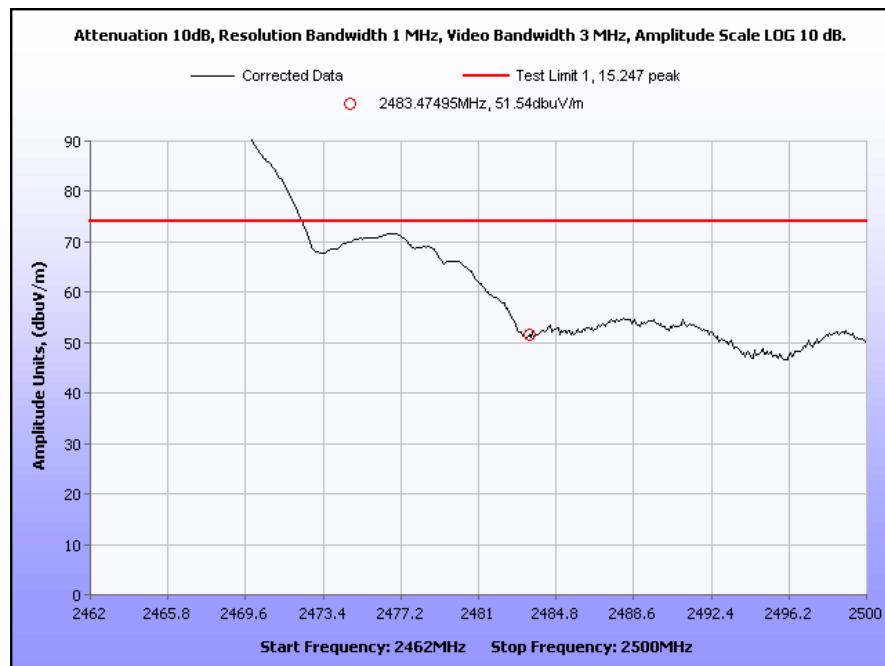
Plot 15. Lower Band Edge, Average



Plot 16. Lower Band Edge, Peak



Plot 17. Upper Band Edge, Average



Plot 18. Upper Band Edge, Peak

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Spurious Emissions Requirements –RF Conducted

Test Procedure: For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

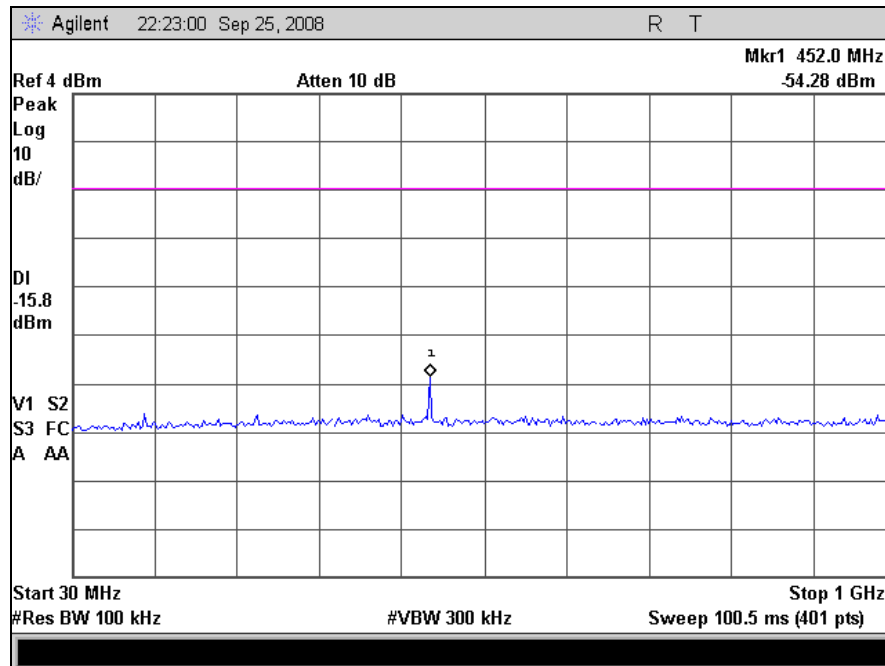
Test Results: Equipment complies with the Conducted Spurious Emissions Requirements.

Test Engineer(s): Dusmantha Tennakoon

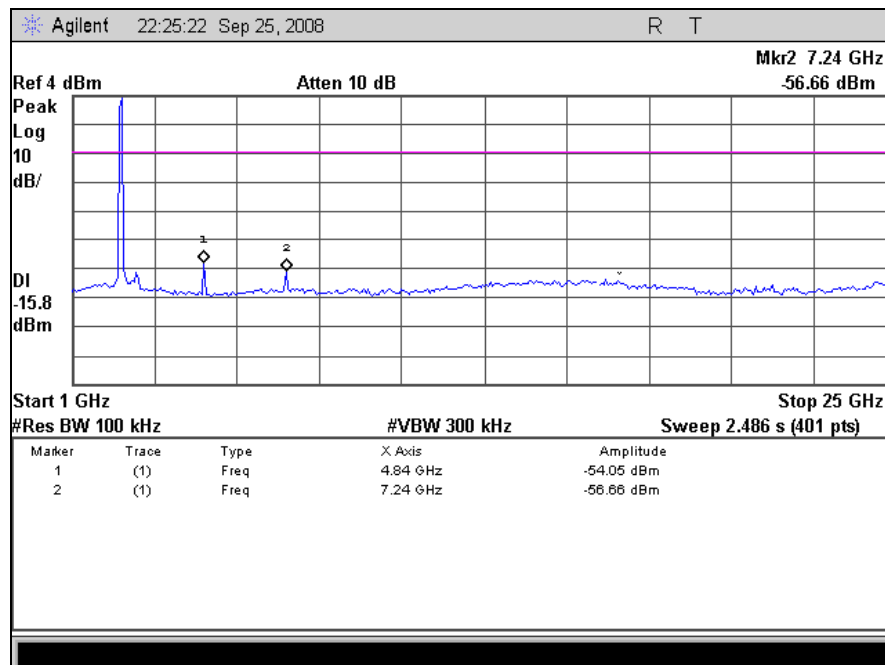
Test Date(s): 09/26/08



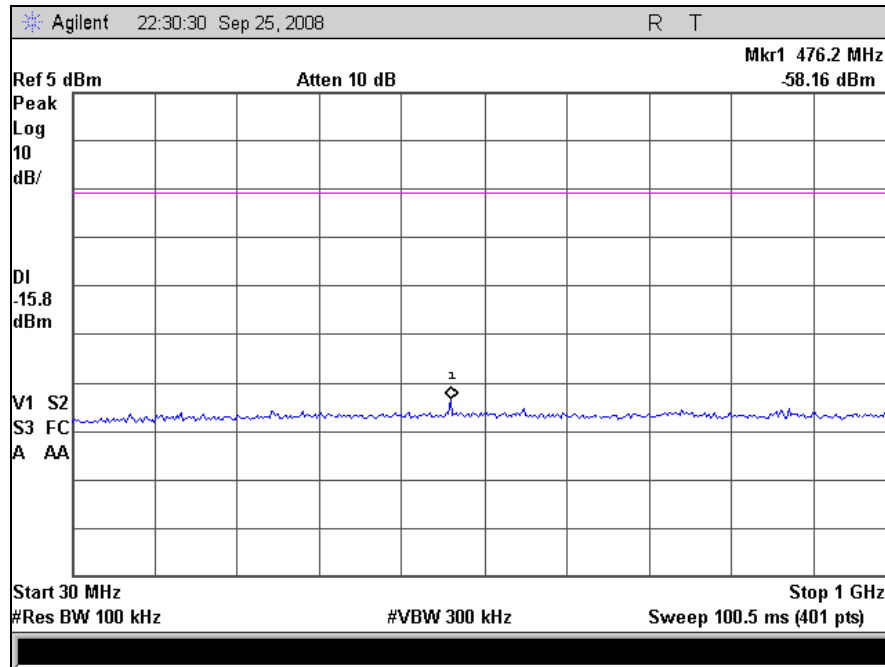
Figure 4. Spurious Conducted Emissions Test Setup



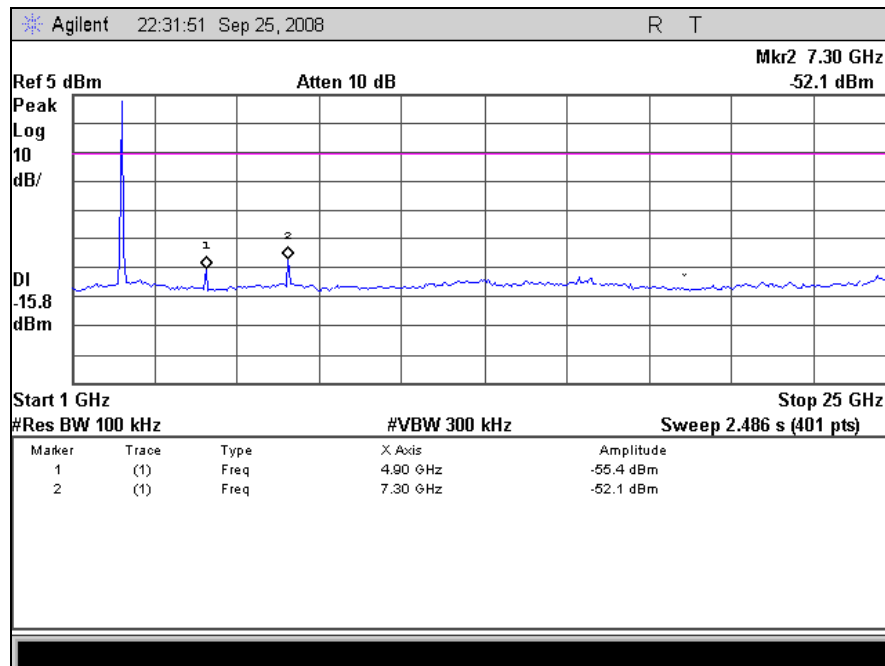
Plot 19. Low Channel Conducted Emissions 30MHz - 1GHz



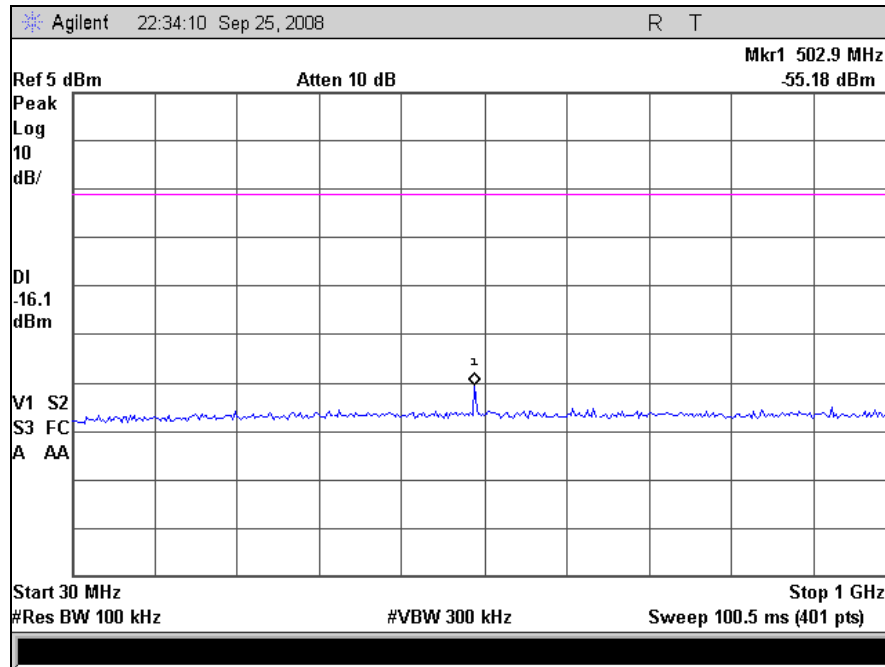
Plot 20. Low Channel Conducted Emissions 1-25GHz



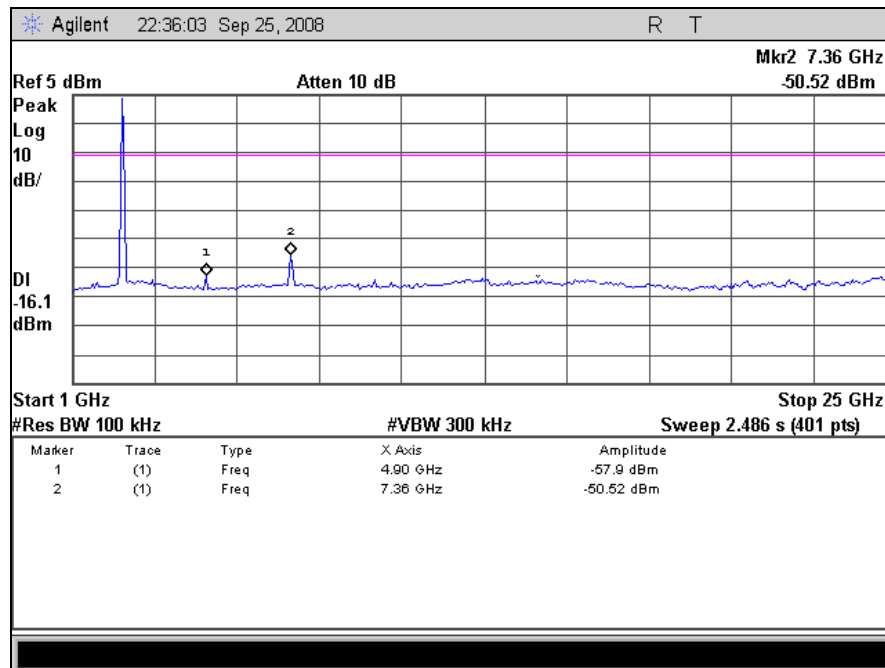
Plot 21. Mid Channel Conducted Emissions 30MHz – 1GHz



Plot 22. Mid Channel Conducted Emissions 1 - 25GHz



Plot 23. High Channel Conducted Emissions 30MHz- 1GHz



Plot 24. High Channel Conducted Emissions 1-18GHz

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(e) Peak Power Spectral Density

Test Requirements: §15.247(e): For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8dBm in any 3 kHz band during any time interval of continuous transmission.

Test Procedure: The transmitter was connected directly to a Spectrum Analyzer. The power level was set to the maximum level. The RBW was set to 3 kHz. The spectrum analyzer was set to sweep over a 500 second interval. Measurements were carried out at the low, mid and high channels.

Test Results: Equipment complies with the peak power spectral density limits of § 15.247 (e). The peak power spectral density was determined from plots on the following page(s).

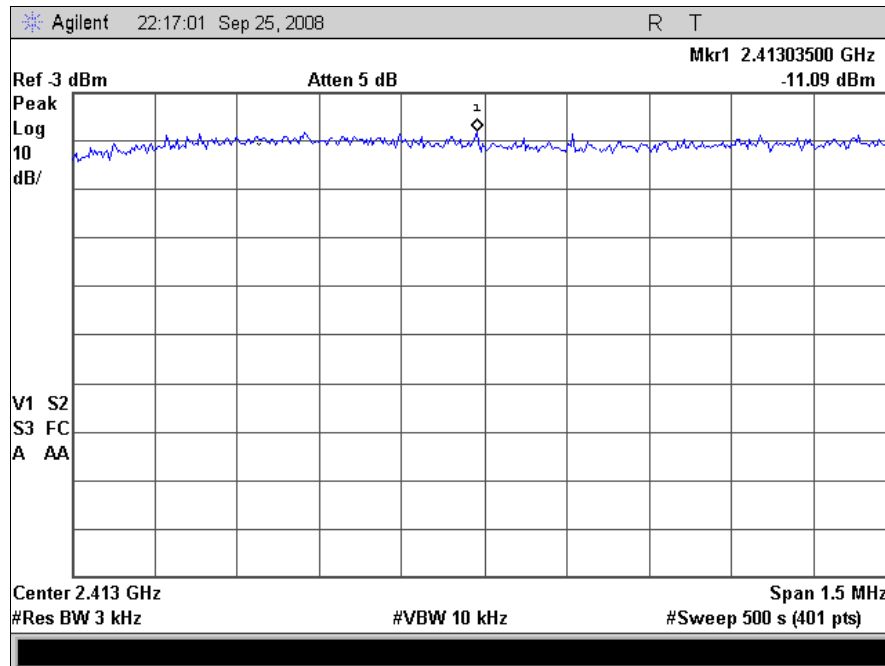
802.11b				
Carrier Channel	Frequency (MHz)	Measured PPSD (dBm)	Limit (dBm)	Margin (dB)
Low	2413	-11.09	8	-19.09
Mid	2433	-10.63	8	-18.63
High	2459	-10.78	8	-18.78

Test Engineer: Dusmantha Tennakoon

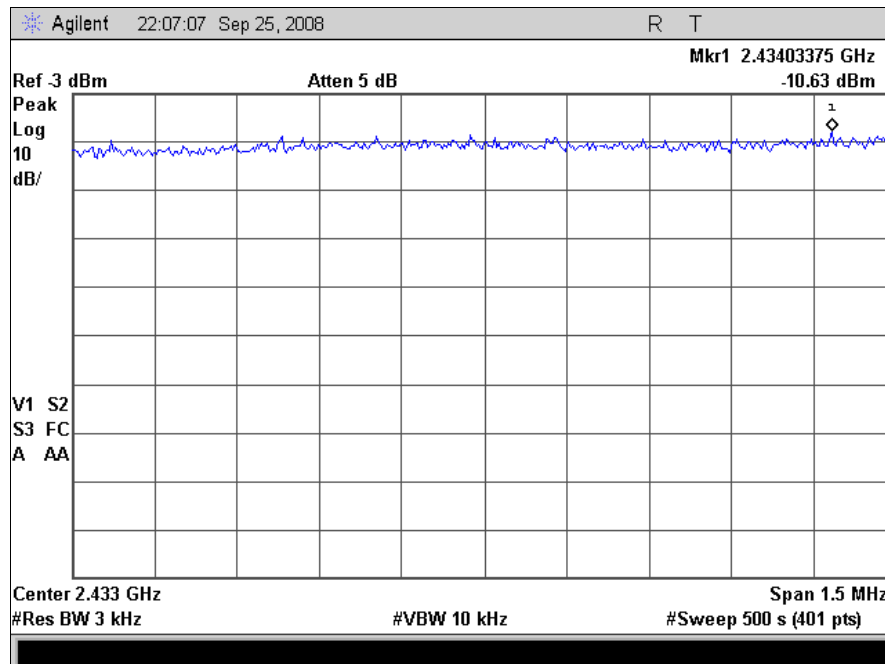
Test Date: 09/26/08

Electromagnetic Compatibility Criteria for Intentional Radiators

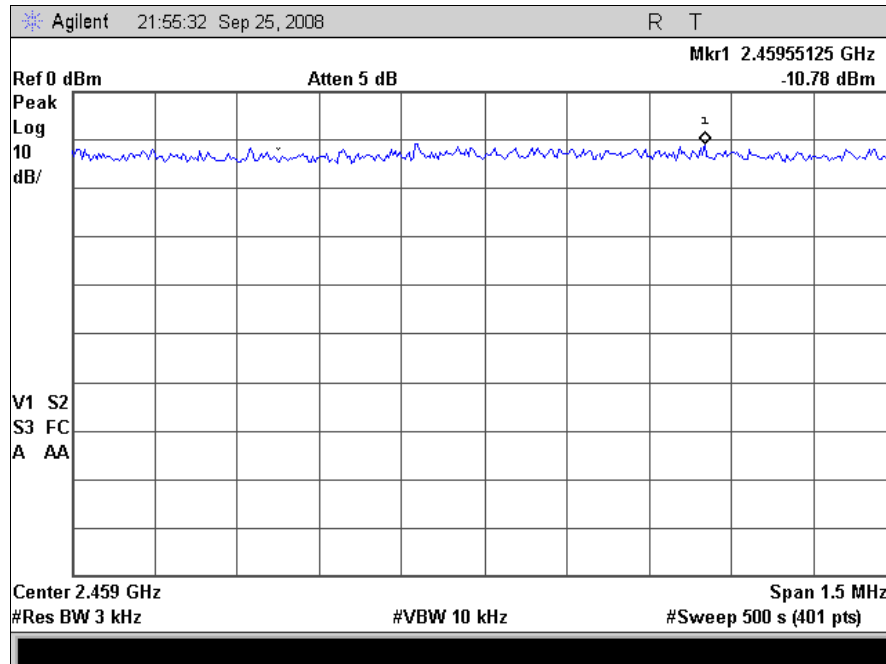
§ 15.247(e) Peak Power Spectral Density (802.11b/g)



Plot 25. Low Ch Peak Power Spectral Density



Plot 26. Mid Ch Peak Power Spectral Density



Plot 27. High Ch Peak Power Spectral Density

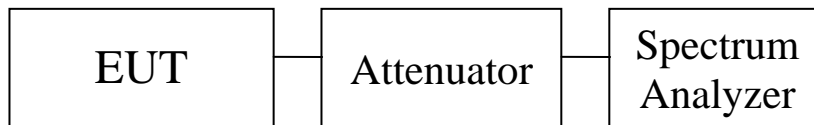


Figure 5. Peak Power Spectral Density Test Setup

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ANSI/NCSL Z540-1-1994 and ANSI/ISO/IEC 17025:2000.

MET Asset #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1T4502	COMB GENERATOR	COM-POWER	CGC-255	09/08/2008	09/08/2009
1T4621	ESA-E SERIES SPECTRUM ANALYZER	AGILENT	E4402B	02/29/2008	03/01/2009
1T4212	LISN; SWITCH	SOLAR ELECTRONICS	9252-R-24-BNC	01/04/2008	01/04/2009
1T4079	LISN; SWITCH	SOLAR	8012-50-R-24-BNC	04/22/2008	04/22/2009
1T4627	THERMO/HYGROMETER	CONTROL COMPANY	S6-627-9	09/25/2007	09/25/2009
1T4503	SHIELDED ROOM	UNIVERSAL SHIELDING CORP	N/A	N/A	N/A
1T4442	PRE-AMPLIFIER, MICROWAVE	MITEQ	AFS42-01001800-30-10P	N/A	N/A
1T4409	EMI RECEIVER	ROHDE & SCHWARZ	ESIB7	04/18/2008	04/18/2009
1T2511	ANTENNA; HORN	EMCO	3115	07/29/2008	07/29/2009
1T4300	SEMI-ANECHOIC CHAMBER # 1	EMC TEST SYSTEMS	NONE	02/17/2006	01/17/2009
1T4303	ANTENNA; BILOG	SCHAFNER - CHASE EMC	CBL6140A	07/07/2008	07/07/2009
1T4592	RF FILTER KIT	VARIOUS	N/A	N/A	N/A
1T4612	ESA-E SERIES SPECTRUM ANALYZER	AGILENT	E4407B	01/04/2008	01/04/2009

V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing*;
 - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
 - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer, be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.*
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
- (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
- (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
- (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
- (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

(a) *In addition to the requirements in Part 2 of this chapter, a device subject to certification or verification shall be labeled as follows:*

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

- (4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified under paragraph (a) of this section is required to be affixed only to the main control unit.

- (5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

§ 15.21 Information to user.

The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

ICES-003 Procedural & Labeling Requirements

From the Industry Canada Electromagnetic Compatibility Advisory Bulletin entitled, "Implementation and Interpretation of the Interference-Causing Equipment Standard for Digital Apparatus, ICES-003" (EMCAB-3, Issue 2, July 1995):

"At present, CISPR 22: 2002 and ICES technical requirements are essentially equivalent. Therefore, if you have CISPR 22: 2002 approval by meeting CISPR Publication 22, the only additional requirements are: to attach a note to the report of the test results for compliance, indicating that these results are deemed satisfactory evidence of compliance with ICES-003 of the Canadian Interference-Causing Equipment Regulations; to maintain these records on file for the requisite five year period; and to provide the device with a notice of compliance in accordance with ICES-003."

Procedural Requirements:

According to Industry Canada's Interference Causing Equipment Standard for Digital Apparatus ICES-003 Issue 4, February 2004:

- Section 6.1: A record of the measurements and results, showing the date that the measurements were completed, shall be retained by the manufacturer or importer for a period of at least five years from the date shown in the record and made available for examination on the request of the Minister.
- Section 6.2: A written notice indicating compliance must accompany each unit of digital apparatus to the end user. The notice shall be in the form of a label that is affixed to the apparatus. Where because of insufficient space or other constraints it is not feasible to affix a label to the apparatus, the notice may be in the form of a statement in the user's manual.

Labeling Requirements:

The suggested text for the notice, in English and in French, is provided below, from the Annex of ICES-003:

This Class [²] digital apparatus complies with Canadian ICES-003.

Cet appareil numérique de la classe [¹] est conforme à la norme NMB-003 du Canada.

² Insert either A or B but not both as appropriate for the equipment requirements.

End of Report