

12. ANSI C63.10)6.2.2) requires that, for AC line conducted (AClc) testing on a table-top, the vertical conducting plane (or screen room wall) be located 40 cm behind the test stand, as shown in the figure at the bottom of p.13 of the EMC reports, however, from the test set-up photos provided, it does not appear that this is the case. Please address.

Response: This was brought up by our NVLAP auditor during our last audit in that we were using the alternative test set up in Cisp 22 when performing conducted emissions testing. Cisp 22 allows an alternative test procedure which is to lower the table to 40cm. Our auditor pointed out that this was not in accordance with ANSI C63.4 and when checking it was confirmed that for FCC testing when using ANSI C63.4 the table must remain at 80cm, however, it was pointed out in accordance with ANSI C63.4 Clause 5.2.2 that the Vertical Conductive Plane was optional. *"A tabletop device may be measured for ac power-line conducted emissions without a vertical conducting plane while maintaining the 80 cm EUT elevation specified in 6.3.1."* This appears to be confirmed in ANSI C63.10 Clause 6.2.2 last sentence on page *"The LISN housing, measuring instrument case, and reference ground plane or vertical conducting plane, if used, shall be bonded together (see ANSI C63.4)."* As such in accordance with our NVLAP auditor we have been conducted our conducted emissions on our OATS using a 40cm table for EU (CISPR) testing and an 80cm table without the optional vertical ground plane for any testing using ANSI as the base standard. Consequently, we feel that the device as presented has been tested in accordance with the applicable standards and does not require any further testing.