

MET Laboratories, Inc. Safety Certification - EMI - Telecom Environmental Simulation

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October 27, 2016

Ooma, Inc. 1880 Embarcadero Rd. Palo Alto, CA 94303

Dear Vi Lu,

Enclosed is the EMC Wireless test report for compliance testing of the Ooma, Inc., SENSEDW001 and DHAN-O as tested to the requirements of Title 47 CFR 2015 edition for Part 15, Subpart D and RSS-213, Issue 3, March 2015 for Intentional Radiators.

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 contact me.

Sincerely yours,

MET LABORATORIES, INC.

Jennifer Warnell

Documentation Department

Reference: (\Ooma, Inc.\EMCS91495-FCC15D REV 1)

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Electromagnetic Compatibility Criteria Test Report

for the

Ooma, Inc. Model SENSEDW001 and DHAN-O

Tested under

the FCC Rules contained in Title 47 of the CFR, Part 15. Subpart D and RSS-213 for Intentional Radiators

MET Report: EMCS91495-FCC15D REV 1

October 27, 2016

Prepared For:

Ooma, Inc. 1880 Embarcadero Rd. Palo Alto, CA 94303

> Prepared By: MET Laboratories, Inc. 914 W. Patapsco Ave. Baltimore, MD 21230



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Ooma, Inc. Model SENSEDW001 and DHAN-O

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the FCC Rules contained in Title 47 of the CFR, Part 15. Subpart D and RSS-213 for Intentional Radiators

Jun Qi, Project Engineer

Electromagnetic Compatibility Lab

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 Part 15 Subpart D, of the FCC Rules and Industry Canada standard RSS-213, Issue 3, March 2015 under normal use and maintenance.

Asad Bajwa

Director, Electromagnetic Compatibility Lab

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Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	September 8, 2016	Initial Issue.
1	October 27, 2016	Report Updates Made During TCB Review



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List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
d	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
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
f	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
Н	Magnetic Field
НСР	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μΗ	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 Ooma, Inc. SENSEDW001 and DHAN-O, with the requirements of Part 15 Subpart D. 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 SENSEDW001 and DHAN-O. Ooma, Inc. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the SENSEDW001 and DHAN-O, 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 Subpart D, in accordance with Ooma, Inc., purchase order number 7891.

Requirement	FCC Part	Canada RSS-213	Test Procedure (Section numbers refer to ANSI C63.17 unless otherwise noted)	Result
Emission Bandwidth	15.303(c) & 15.323 (a)	5.5	6.1.3	Compliant
Labeling Requirements	15.311 & 15.19(a)(3)	RSS-Gen		Compliant
Conducted Emissions	15.315 & 15.207	5.4	ANSI C63.4	Not Applicable
Antenna Requirements	15.317 & 15.203	N/A	Declaration	Compliant
Use digital modulation	15.319 (b)	5.1	6.1.4	Compliant
Peak transmit power	15.303(f) & 15.319 (c)	5.6	6.1.2	Compliant
Power spectral density	15.319 (d) & 15.107	5.7	6.1.5	Compliant
Power adjustment for antenna gain	15.319 (e)	5.6	4.3.1	Compliant
Automatically discontinue transmission	15.319 (f)	5.2		Compliant
Spurious emissions conducted	15.323 (d) (1) & 15.323 (d) (2)	5.8	6.1.6	Compliant
RF Exposure	15.319 (i) & 1.1307(b), 2.1091 and 2.1093	RSS-102	ANSI/IEEE C95.1	Compliant
Monitoring time	15.323 (c)(1)	5.2(1)	7.3.4	Compliant
Monitoring threshold	15.323 (c)(2)	5.2(2)	7.3	Compliant
Duration of transmission	15.323 (c)(3)	5.2(3)	8.2.2	Not Applicable
Channel confirmation	15.323 (c)(5.2)	5.2(4)	7.3.3 & 7.3.4	Compliant
Power accuracy	15.323 (c)(5.3)	5.2(5)	7.3.3	Compliant
Segment occupancy	15.323 (c)(5.4)	5.2(5)	Declaration	Compliant
Random waiting	15.323 (c)(6)	5.2(6)	8.1.3	Not Applicable
Monitoring bandwidth	15.323 (c)(7)	5.2(7)	7.4	Compliant
Monitoring reaction time	15.323 (c)(1)	5.2(7)	7.5	Compliant



Requirement	FCC Part	Canada RSS-213	Test Procedure (Section numbers refer to ANSI C63.17 unless otherwise noted)	Result
Monitoring antenna	15.323 (c)(8)	5.2(8)	4	Compliant
Monitoring threshold relaxation	15.323 (c)(9)	5.2(9)	4	Compliant
Duplex connections	15.323 (c)(10)	5.2(10)	8.3	Not Applicable
Alternate monitoring interval	15.323 (c)(11)	5.2(11)	8.4	Not Applicable
Fair access	15.323 (c)(12)	5.2(12)	Declaration	Not Applicable
Frame period	15.323 (e)	5.2(13)	6.2.2 & 6.2.3	Compliant
Frequency stability	15.323 (f)	5.3	6.2.1	Compliant
Radiated Out of Band Emissions	15.309 (b) & FCC Part 15 Subpart B, 15.109 and 15.209	5.8		Compliant

Table 1. Executive Summary of EMC Part 15 Subpart D ComplianceTesting



II. Equipment Configuration



A. Overview

MET Laboratories, Inc. was contracted by Ooma, Inc. to perform testing on the SENSEDW001 and DHAN-O, under Ooma, Inc.'s purchase order number 7891.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Ooma, Inc., SENSEDW001 and DHAN-O.

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

Model(s) Tested:	SENSEDW001 and DHAN-O		
Model(s) Covered:	SENSEDW001 and DHAN-O		
Type of Modulations: GFSK Emission Designators: G1Q Equipment Code: PUB EUT power: 19.51dBm		DECT wireless technology based module GFSK G1Q PUB 19.51dBm	
	EUT Frequency Ranges: Time Slot Length Slots per Frame Number of Channels	1921.16- 1928.07MHz 24/10 [ms] (1 frame=10 ms, 24 slots per frame) 24 5	
Analysis:	The results obtained relate only to the item(s) tested.		
	Temperature: 15-35° C		
Environmental Test Conditions:	Relative Humidity: 30-60%		
	Barometric Pressure: 860-1060 mbar		
Evaluated by:	Jun Qi		
Report Date(s):	October 27, 2016		



B. References

CFR 47, Part 15, Subpart D Federal Communication Commission, Code of Federal Regulations, Topart 15: General Rules and Regulations, Allocation, Assignment, and Radio Frequencies	
CFR 47, Part 15, Subpart B	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ICES-003, Issue 5, August 2012	Information Technology Equipment (ITE) - Limits and methods of measurement
RSS-213, Issue 3, March 2015	2 GHz Licence-exempt Personal Communications Service Devices (LE-PCS)
ANSI C63.4:2014	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ISO/IEC 17025:2005	General Requirements for the Competence of Testing and Calibration Laboratories

C. Test Site

All testing was performed at MET Laboratories, Inc., 3162 Belick St., Santa Clara, CA 95054. 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 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 DHAN-O module is the DECT wireless technology based module. The SENSEDW001 is a window/door open and closed sensor build based on DHAN-O module.

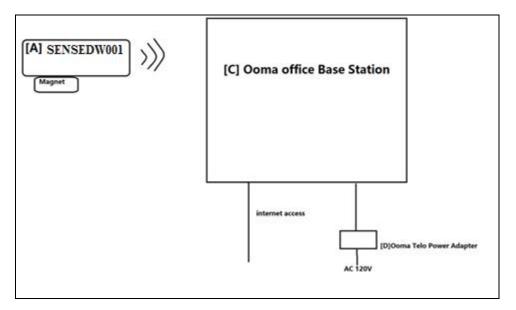


Figure 1. Block Diagram of Test Configuration



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	Revision
A	SENSEDW001	SENSEDW001	550-0153-900	N/A	9
В	DHAN-O	DHAN-O	550-0156-100	N/A	1

Table 2. Equipment Configuration

F. Support Equipment

Ooma, Inc. supplied support equipment necessary for the operation and testing of the SENSEDW001 and DHAN-O. All support equipment supplied is listed in the following Support Equipment List.

Ref. ID	Name / Description	Manufacturer	Model Number
С	Ooma Office Base Station	Ooma	telo
D	Ooma Telo Power Adapter	Ooma	Telo power adapter
Е	2 AAA BATTERY	N/A	N/A

Table 3. Support Equipment

G. Mode of Operation

After power up the SENSEDW001 using 3V power supply or 2 AAA batteries, it need to be registered to a Ooma Telo device which got connected to the internet. Then the SENSEDW001 will go into service. It will be in the idle mode for most of the time until there is an event been triggered. Events including separating the magnet away from the main body or get closed to the main body as well as internal keep alive timer that triggered the event every 90 seconds.

H. Method of Monitoring

The Ooma Telo device will be able to tell when the event have been triggered on ELWOOD and have been send over to Ooma Telo device.

I. Modifications

a) Modifications to EUT

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the standard.

J. Disposition of EUT

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





§ 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 EUT as tested is compliant the criteria of §15.203. The antenna is permanently attached to

the unit.

Test Engineer(s): Jun Qi



§ 15.319(b) Modulation Techniques

Test Requirement: § 15.319: All transmissions must use only digital modulation techniques.

Test Procedure: Attestation of manufacturer supported by reference to relevant DECT specifications.

Attestation: This device is compliant with the DECT standards described in European Standards EN 300

175-2 and EN 300 175-3. DECT transmissions are MC/TDMA/TDD (Multi carrier / Time Division Multiple Access / Time Division Duplex) using Digital GFSK modulation. For further

details see operational description or relevant portions of the DECT standards.

Results: The EUT as tested is compliant the criteria of §15.319(b).

Test Engineer(s): Jun Qi



§ 15.323(a) Emission Bandwidth

Test Criteria: § 15.323(a): For purposes of this subpart the emission bandwidth shall be determined by

measuring the width of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, that are 26 dB down relative to the maximum level of the modulated carrier. Compliance with the emissions limits is based on the use of measurement instrumentation employing a peak detector function with an instrument resolutions bandwidth approximately equal to 1.0 percent of the emission bandwidth of the device under

measurement.

Test Procedure: Operation shall be contained within the 1920-1930 MHz band. The emission bandwidth shall be

less than 2.5 MHz. The power level shall be as specified in §15.319(c), but in no event shall the

emission bandwidth be less than 50 kHz.

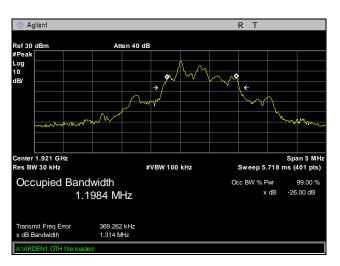
Test Results The EUT was compliant with this requirement.

Test Engineer(s): Jun Qi

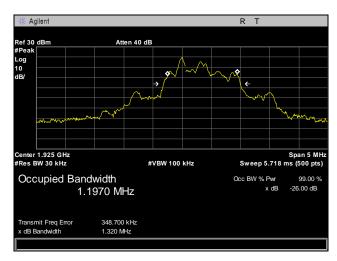
Channel	BW(MHz)
LOW(23)	1.314
MID(25)	1.32
HIGH(27)	1.319
AVG	1.3176667

Table 4. Emission Bandwidth, Test Results

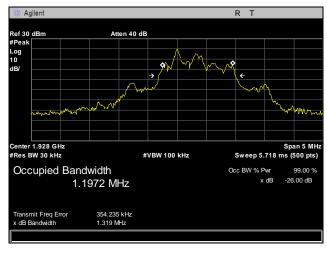




Plot 1. Emission Bandwidth, Channel 23 @ 1921 MHz



Plot 2. Emission Bandwidth, Channel 25 @ 1925 MHz



Plot 3. Emission Bandwidth, Channel 27 @ 1928 MHz



§ 15.319(c) Peak Transmit Power

Test Criteria: §15.319(c): The peak transmit power shall not exceed 100 microwatts multiplied by the square

root of the emission bandwidth in hertz. Peak transmit power must be measured over any interval of continuous transmission using instrumentation calibrated in terms of an rms equivalent voltage. The measurement results shall be properly adjusted for any instrument limitations, such as detector response times, limited resolution bandwidth capability when compared to the emission bandwidth, sensitivity, etc., so as to obtain a true peak measurement

for the emission in question over the full bandwidth of the channel.

Test Procedure: Testing to ANSI C63.17-2013 Clause 6.1.2, which provides the test methodology for this

provision. The EUT is controlled from a personal computer and set into continuous transmission

mode.

Test Results: Equipment complies with the Peak Transmit Output limits of § 15.319(c).

Peak Transmit Power Limit= 5Log (1.317667 exp6) – 10dBm

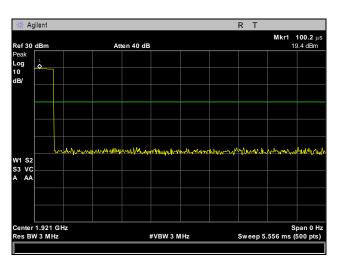
20.61dBm

Test Engineer(s): Jun Qi

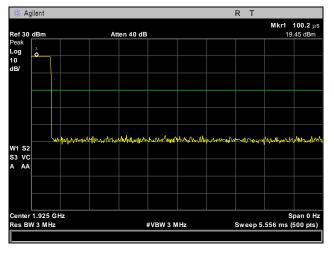
RF Transmit Power				
Carrier Frequency Measured Peak Output Power				
Channel	(MHz)	dBm		
Low(23)	1921.16	19.4		
Mid(25)	1924.62	19.45		
High(27)	1928.07	19.51		

Table 5. Peak Transmit Power, Test Results

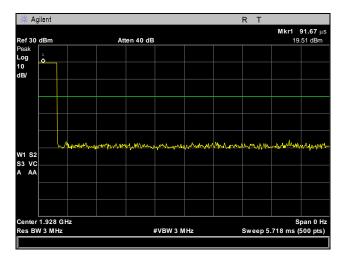




Plot 4. Peak Transmit Power, Channel 21, 1921 MHz



Plot 5. Peak Transmit Power, Channel 25, 1925 MHz



Plot 6. Peak Transmit Power, Channel 27, 1928 MHz



§ 15.319(d) Power Spectral Density

Test Criteria: §15.319(d): Power spectral density shall not exceed 3 milliwatts in any 3 kHz bandwidth as

measured with a spectrum analyzer having a resolution bandwidth of 3 kHz.

Test Procedure: Testing to ANSI C63.17-2013 Clause 6.1.5, which provides the test methodology for this

provision.

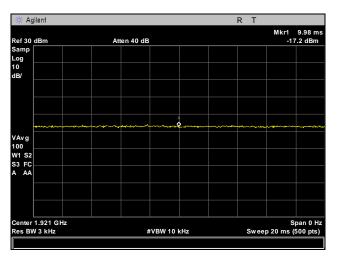
Test Results: Equipment complies with the Power Spectral Density limits of § 15.319(d).

Test Engineer(s): Jun Qi

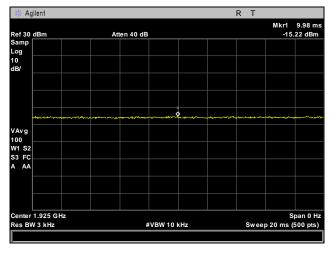
Power Spectral Density					
Carrier Frequency Measured Peak Power					
Channel	(MHz)	Spectral Density (dBm)			
Low(23)	1921.16	-17.2			
Mid(25)	1924.62	-15.22			
High(27)	1928.07	-19.38			

Table 6. Power Spectral Density, Test Results

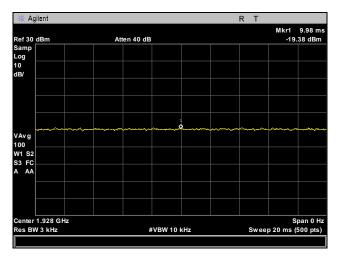




Plot 7. Power Spectral Density, Channel 23, 1921 MHz



Plot 8. Power Spectral Density, Channel 25, 1925 MHz



Plot 9. Power Spectral Density, Channel 27, 1928 MHz



§ 15.319(e) Power Adjustment for Antenna Gain

Test Criteria: §15.319(e): The peak transmit power shall be reduced by the amount in decibels that the

maximum directional gain of the antenna exceeds 3 dBi.

Test Procedure: Testing to ANSI C63.17-2013 Clause 4.3.1, which provides the test methodology for this

provision.

Test Results: Equipment Employs a 2.5 dBi Antenna. Max output power allowed with this gain by the EUT is

20.67dBm. The Max output power does not need to be reduced.

The Output Power complies with the Power Adjustment for Antenna Gain requirements of

§15.319(e).

Test Engineer(s): Jun Qi



§ 15.319(f) Automatically Discontinue Transmission

Test Criteria: §15.319(f): The device shall automatically discontinue transmission in case of either absence of

information to transmit or operational failure. These provisions are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain

digital technologies to complete frame or burst intervals.

Test Results: Equipment complies with the Automatic Discontinuance of transmission in accordance with

§15.319(f).

	Test	Reaction of EUT	Result
1	Remove Power from Companion Device	A	Pass
2	Switch off the companion device	A	Pass
3	Terminate call at the companion device	NA1	Pass
4	Switch off the EUT	NA2	Pass
5	Terminate call at the EUT	NA3	Pass

Table 7. Automatic Discontinuance of Transmission, Test Results

- A Connection was terminated and transmission ceased.
- B Connection was terminated but the EUT transmits control or signaling information.
- C Connection was terminated but the companion device transmits control or signaling information.
- NA 1 Companion Device does not have an on/off switch for terminate call.
- NA 2 EUT does not have an on/off switch.
- NA 3 EUT does not have a switch for terminate call.



§ 15.319(i) 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.

FCC									
Frequency (MHz)	Con. Pwr. (dBm)	Con. Pwr. (mW)	Ant. Gain (dBi)	Ant. Gain numeric	Pwr. Density (mW/cm²)	Limit (mW/cm ²)	Margin	Distance (cm)	Result
1928	19.51	89.331	2.5	1.778	0.0316	1	0.9684	20	Pass

IC											
Frequency (MHz)	Con. Pwr. (dBm)	Con. Pwr. (mW)	Ant. Gain (dBi)	Ant. Gain numeric	Pwr. Density (W/m²)	MPE Limit (W/m²)	Margin	Distance (cm)	e.i.r.p. (W)	e.i.r.p. Exempt Limit (W)	Result
1928	19.51	89.331	2.5	1.778	N/A	N/A	N/A	20	0.15885	2.3031	Exempt



§ 15.323(c)(7) Monitoring Reaction Time

Test Criteria: §15.323 (c)(7) If a signal is detected that is 6 dB or more above the applicable threshold level,

the maximum reaction time shall be 35xSQRT (1.25/emission bandwidth in MHz)

microseconds but shall not be required to be less than 35 microseconds.

Test Procedure: Testing to ANSI C63.17-2013 Clause 7.5, which provides the test methodology for this

provision..

Test Results: The Manufacturer declares that this provision is not utilized by the EUT.



§ 15.323(c)(2); (c)(9) Monitoring Threshold

Test Criteria: §15.323 (c)(2). The monitoring threshold must not be more than 30 dB above the thermal noise

power for a bandwidth equivalent to the emission bandwidth used by the device.

§15.323 (c)(9). Devices that have a power output lower than the maximum permitted under this subpart may increase their monitoring detection threshold by one decibel for each one decibel

that the transmitter power is below the maximum permitted.

Test Procedure: Testing to ANSI C63.17-2013 Clause 7.3, which provides the test methodology for this

provision. The Clause states that the lower threshold is for devices that do not use the LIC procedure. The equation for the lower monitoring threshold is given in ANSI C63.17 Clause

4.3.4.

Test Results: The EUT is compliant with this requirement.

Test Engineer(s): Jun Qi

Upper Threshold							
В	1.3177	MHz					
Mu	50	dB					
Peut	19.51	dBm					
Tu =	-61.701	dBm					
Lower Threshold							
В	1.3177	MHz					
Ml	30	dB					
Peut	19.51	dBm					
Tl =	-81.701	dBm					

Table 8. Monitoring Threshold, Test Results



§ 15.323(c)(3) Duration of Transmission

Test Criteria: §15.323 (c)(3) If no signal above the threshold level is detected, transmission may commence

and continue with the same emission bandwidth in the monitored time and spectrum windows without further monitoring. However, occupation of the same combined time and spectrum windows by a device or group of cooperating devices continuously over a period of time longer

than 8 hours is not permitted without repeating the access criteria.

Test Procedure: Testing to ANSI C63.17-2013 Clause 4, which provides the test methodology for this provision.

A communication link is established between BS and MS in a conducted mode and in a room without other US DECT devices to prevent influence from other transmissions. According to FCC Part 15.323(c)(3), the access criteria have to be verified at least every 8 hours. The

following test is performed:

Attestation: The sensor will go into hibernation after a few minutes. It is not possible to keep a connection

running very long. Therefore, this requirement is not applicable.



§ 15.323(c)(5) Selected Channel Confirmation, Power Accuracy, Segment Occupancy

Test Criteria:

§15.323 (c)(5) If access to spectrum is not available as determined by the above, and a minimum of 40 duplex system access channels are defined for the system, the time and spectrum windows with the lowest power level below a monitoring threshold of 50 dB above the thermal noise power determined for the emission bandwidth may be accessed. A device utilizing the provisions of this paragraph must have monitored all access channels defined for its system within the last 10 seconds and must verify, within the 20 milliseconds (40 milliseconds for devices designed to use a 20 milliseconds frame period) immediately preceding actual channel access that the detected power of the selected time and spectrum windows is no higher than the previously detected value. The power measurement resolution for this comparison must be accurate to within 6 dB. No device or group of co-operating devices located within 1 meter of each other shall during any frame period occupy more than 6 MHz of aggregate bandwidth, or alternatively, more than one third of the time and spectrum windows defined by the system.

Test Procedure:

Testing to ANSI C63.17-2013 Clause 7.3.2. & 7.3.3, which provides the test methodology for this provision. The current product offers 12 duplex channels per frequency channel and therefore 12x5=60 duplex channels in total. Hence Part §15.323(c)(5) applies. The equation for the upper monitoring threshold is given in ANSI C63.17 Clause 4.3.3.

Max measured interference level (dBm) = -85.02 dBm

Test Results: The EUT was compliant with this requirement.

Test Engineer(s): Jun Qi

Test Date(s): 08/03/16



§ 15.323(c)(6) Random Waiting

Test Criteria: §15.323 (c)(6)) If the selected combined time and spectrum windows are unavailable, the

device may either monitor and select different windows or seek to use the same windows after waiting an amount of time, randomly chosen from a uniform random distribution between 10

and 150 milliseconds, commencing when the channel becomes available.

Test Procedure: Testing to ANSI C63.17-2013 Clause 8.1.3, which provides the test methodology for this

provision.

Attestation: The Manufacturer declared that this provision is not utilized by the EUT.



§ 15.323(c)(7) Monitoring Bandwidth

Test Criteria: §15.323 (c)(7) The monitoring system bandwidth must be equal to or greater than the emission

bandwidth of the intended transmission and have a maximum reaction time less than 50xSQRT (1.25/ emission bandwidth in MHz) microseconds for signals at the applicable threshold level but shall not be required to be less than 50 microseconds. If a signal is detected that is 6 dB or more above the applicable threshold level, the maximum reaction time shall be 35xSQRT (1.25/emission bandwidth in MHz) microseconds but shall not be required to be less than 35

microseconds.

Test Procedure: Testing to ANSI C63.17-2013 Clause 7.4, which provides the test methodology for this

provision.

Test Results: Per Manufacturer the monitoring is made through the radio receiver used by the EUT for

communication, the intended bandwidth requirement on the monitoring system is met. Based

on manufacturer's declaration this requirement is considered to be met.

Test Engineer(s): Jun Qi



§ 15.323(c)(8) Monitoring Antenna

Test Criteria: §15.323 (c)(8)) Transmission is intended to occupy. The following criteria must be met: (8)

The monitoring system shall use the same antenna used for transmission, or an antenna that

yields equivalent reception at that location.

Test Procedure: Testing to ANSI C63.17-2013 Clause 4, which provides the test methodology for this provision.

Attestation: The EUT uses the same antennas for transmission and reception as for monitoring.

Test Engineer(s): Jun Qi



§ 15.323(c)(10) Duplex Connections

Test Criteria: §15.323 (c)(10) An initiating device may attempt to establish a duplex connection by

monitoring both its intended transmit and receive time and spectrum windows. If both the intended transmit and receive time and spectrum windows meet the access criteria, then the initiating device can initiate a transmission in the intended transmit time and spectrum window. If the power detected by the responding device can be decoded as a duplex connection signal from the initiating device, then the responding device may immediately begin transmitting on

the receive time and spectrum window monitored by the initiating device.

Test Procedure: Testing to ANSI C63.17-2013 Clause 8.3, which provides the test methodology for this

provision. The MS is the initiating device and the BS is the companion device.

Test Results: The Manufacturer declares that this provision is not utilized by the EUT.



§ 15.323(c)(11) Alternative Monitoring Interval For Co-Located Devices

Test Criteria: §15.323 (c)(11) An initiating device that is prevented from monitoring during its intended

transmit window due to monitoring system blocking from the transmissions of a co-located (within one meter) transmitter of the same system, may monitor the portions of the time and spectrum windows in which they intend to receive over a period of at least 10 milliseconds. The monitored time and spectrum window must total at least 50 percent of the 10 millisecond frame interval and the monitored spectrum must be within the 1.25 MHz frequency channel(s) already occupied by that device or co-located co-operating devices. If the access criteria is met for the intended receive time and spectrum window under the above conditions, then transmission in

the intended transmit window by the initiating device may commence.

Test Procedure: Testing to ANSI C63.17-2013 Clause 8.4, which provides the test methodology for this

provision. The MS is initiating device and the BS is the companion device.

Test Results: The Manufacturer declares that this provision is not utilized by the EUT.



§ 15.323(c)(12) Fair Access

Test Criteria: §15.323 (c)(12) The provisions of (c)(10) or (c)(11) of this section shall not be used to extend

the range of spectrum occupied over space or time for the purpose of denying fair access to

spectrum to other devices.

Test Procedure: The manufacturer supplies an attestation.

Attestation: The manufacturer declares that the EUT does not work in a mode which denies fair access to

spectrum for other devices.



Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.323(d)(1) Spurious Emissions

Test Criteria: §15.323(d)(1): Out of Band Emissions

Emissions shall be attenuated below a reference power of 112 milliwatts as follows: 30 dB between the band edge and 1.25 MHz above or below the band; 50 dB between 1.25 and 2.5 MHz above or below the band; and 60 dB at 2.5 MHz or greater above or below the band.

§15.323(d)(2): In-Band Emissions

Emissions inside the band must comply with the following emission mask: In the bands between 1B and 2B measured from the center of the emission bandwidth, the total power emitted by the device shall be at least 30 dB below the transmit power permitted for that device; in the bands between 2B and 3B measured from the center of the emission bandwidth, the total power emitted by an intentional radiator shall be at least 50 dB below the transmit power permitted for that radiator; in the bands between 3B and the band edge, the total power emitted by an intentional radiator in the measurement bandwidth shall be at least 60 dB below the transmit power permitted for that radiator. "B" is defined as the emission bandwidth of the device in hertz. Compliance with the emission limits is based on the use of measurement instrumentation employing peak detector function with an instrument resolution bandwidth approximately equal to 1.0 percent of the emission bandwidth of the device under measurement.

Test Procedure: For both in and out of band emissions the EUT was connected directly to a spectrum analyzer.

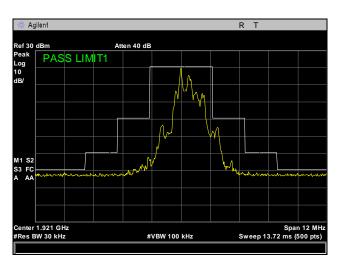
The RBW of the spectrum analyzer was set to a minimum 1% of the emission band width.

Test Results: Equipment complies with the Spurious Emission limits of § 15.323(d)(1).

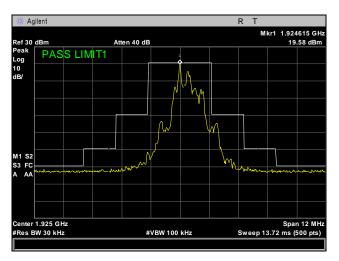
Test Engineer(s): Jun Qi

Test Date(s): 07/28/16

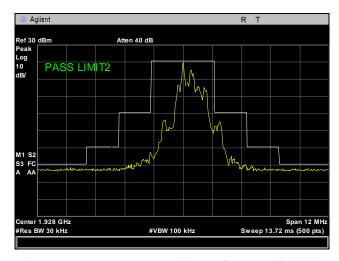




Plot 10. In-Band Unwanted Emissions, Channel 23, 1921 MHz

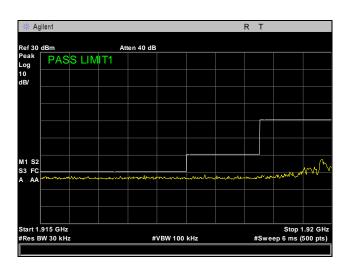


Plot 11. In-Band Unwanted Emissions, Channel 25, 1925 MHz

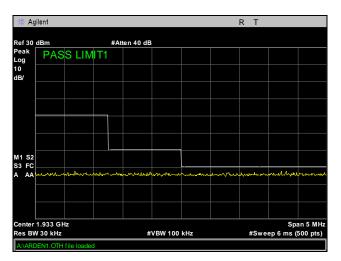


Plot 12. In-Band Unwanted Emissions, Channel 28, 1928 MHz

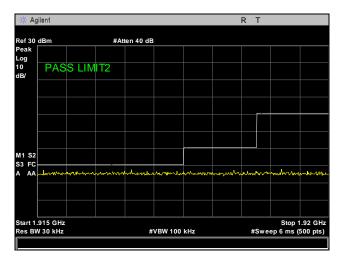




Plot 13. Out-of-Band Emissions, Low, Channel 23, 1915 MHz – 1920 MHz

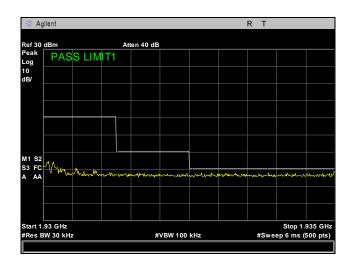


Plot 14. Out-of-Band Emissions, High, Channel 23, 1930 MHz - 1935 MHz



Plot 15. Out-of-Band Emissions, Low, Channel 27, 1915 MHz - 1920 MHz





Plot 16. Out-of-Band Emissions, High, Channel 27, 1930 MHz – 1935 MHz



Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.323(e) Frame Period

Test Criteria: §15.323 (e) The frame period (a set of consecutive time slots in which the position of each time

slot can be identified by reference to a synchronizing source) of an intentional radiator operating in these sub-bands shall be 20 milliseconds or 10 milliseconds/X where X is a positive whole number. Each device that implements time division for the purposes of maintaining a duplex connection on a given frequency carrier shall maintain a frame repetition rate with a frequency stability of at least 50 parts per million (ppm). Each device which further divides access in time in order to support multiple communication links on a given frequency carrier

Timing Jitter

§ 15.323 (e) Specific requirements for isochronous devices operating in the 1920–1930 MHz sub-band. The jitter (time-related, abrupt, spurious variations in the duration of the frame interval) introduced at the two ends of such a communication link shall not exceed 25 microseconds for any two consecutive transmissions. Transmissions shall be continuous in

every time and spectrum window during the frame period defined for the device.

shall maintain a frame repetition rate with a frequency stability of at least 10 ppm.

Test Procedure: The manufacturer supplies an attestation.

Test Engineer(s): Jun Qi

Test Date(s): 08/03/16

Mean Frame Repetition (Hz)	Standard Deviation (Hz)	Frame Repetition Stability (ppm)	Limit (PPM)	Result
100	0.000091	2.729029	10	Pass

Table 9. Frame Period, Test Results

Sample Calculation

Frame Repetition Stability = $(3 \text{ x Standard Deviation}) / \text{Frame Rate}) * 10^6$

Frame Rate = 1 / 10ms = 100 Hz

Measurement recorded:

Mean Frame rate = 1/10ms = 100 Hz

The following timing jitter was recorded:

Measured Max Jitter (μsec)	Limit (µsec)	Results	
0.4	25	Pass	



Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.323(f) Frequency Stability

Test Criteria: §15.323 (f) The frequency stability of the carrier frequency of the intentional radiator shall be

maintained within ± 10 ppm over 1hour or the interval between channel access monitoring, whichever is shorter. The frequency stability shall be maintained over a temperature variation of -20° to $+50^{\circ}$ C at normal supply voltage and over a variation in the primary supply voltage of 85% to 115% of the rated supply voltage at a temperature of 20° C. For equipment that is capable only of operating from a battery, the frequency stability tests shall be performed using a

new battery without any further requirement to vary supply voltage.

Test Procedure: The EUT was placed in the Environmental Chamber and support equipment are outside the

chamber on a table. A CW signal was injected into the EUT at the appropriate RF level. The frequency counter option on the Spectrum Analyzer was used to measure frequency deviations. The frequency drift was investigated for every 10° C increment until the unit is stabilized then

recorded the reading in tabular format with the temperature range of -20° to +50° C.

Voltage supplied to EUT is 3 VDC reference temperature was done at 20°C. The voltage was

varied by \pm 15 % of nominal

Test Results: The EUT was compliant with this requirement.

Test Engineer(s): Jun Qi

Test Date(s): 08/01/16



	(Lo	w Channel)		
	Voltage (DC)	Temperature (C)	Frequency (MHz)	PPM
	2.55	50	1921.145290	5.216
D. C Francisco	3.00	50	1921.145290	5.216
Reference Frequency	3.45	50	1921.145290	5.216
	2.55	20	1921.155310	0.000
	3.00	20	1921.155310	0.000
	3.45	20	1921.155310	0.000
1001 155010	2.55	-20	1921.165330	5.216
1921.155310	3.00	-20	1921.165330	5.216
	3.45	-20	1921.165330	5.216
	(Mi	d Channel)		
	Voltage (DC)	Temperature (C)	Frequency (MHz)	PPM
	2.55	50	1924.604208	0.000
	3.00	50	1924.604208	0.000
Reference Frequency	3.45	50	1924.604208	0.000
	2.55	20	1924.604208	0.000
	3.00	20	1924.604208	0.000
	3.45	20	1924.604208	0.000
1024 (04200	2.55	-20	1924.594188	5.206
1924.604208	3.00	-20	1924.594188	5.206
	3.45	-20	1924.594188	5.206
	(Hig	h Channel)		
	Voltage (DC)	Temperature (C)	Frequency (MHz)	PPM
	2.55	50	1928.055130	5.187
D.C. E	3.00	50	1928.055130	5.187
Reference Frequency	3.45	50	1928.055110	5.197
	2.55	20	1928.065130	0.000
	3.00	20	1928.065130	0.000
	3.45	20	1928.065130	0.000
1000 065100	2.55	-20	1928.075150	5.197
1928.065130	3.00	-20	1928.075150	5.197
	3.45	-20	1928.075150	5.197

Table 10. Frequency Stability, Test Results



IV. Test Equipment



Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2005.

MET Asset #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1U0258	SPECTRUM ANALYZER	AGILENT TECHNOLOGIES	E4407B	2/2/2016	2/2/2017
1S2643	SIGNAL GENERATOR 40GHZ	ANRITSU	MG3694B	3/24/2016	9/24/2017
1S3853	DIGITAL DC POWER SUPPLY	EXTECH INSTRUMENTS	382200	SEE NOTE	
1S2229	TEMPERATURE CHAMBER	TENNY ENGINEERING	T63C	5/4/2015	11/4/2016

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.





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:
 - 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 preproduction 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.



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. 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.

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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.



§ 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.



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 user's 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.



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.



End of Report