



SPORTON International Inc.

No. 52, Hwa Ya 1st Rd., Hwa Ya Technology Park, Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C.
Ph: 886-3-327-3456 / FAX: 886-3-327-0973 / www.sporton.com.tw

Project No: CB10501014

Maximum Permissible Exposure Report

Applicant's company	Extreme Networks, Inc.
Applicant Address	9 Northeastern Blvd. Salem, NH 03079 USA
FCC ID	QXO-4411OAC
Manufacturer's company	Senao Networks, Inc.
Manufacturer Address	3F, No. 529, Chung Cheng Rd., Hsintien, Taipei, Taiwan

Product Name	Wireless 802.11a/AC+ b/g/n Access Point
Brand Name	Extreme Networks
Model Name	31016, 31018, 31017, 31019
Ref. Standard(s)	47 CFR FCC Part 2 Subpart J, section 2.1091
Received Date	Nov. 17, 2015
Final Test Date	Dec. 30, 2015
Submission Type	Class II Change

Sam Chen

SPORTON INTERNATIONAL INC.



Testing Laboratory
1190

Table of Contents

1. GENERAL DESCRIPTION.....	1
1.1. EUT General Information	1
1.2. Table for Multiple Listing and Class II Change	1
1.3. Testing Location.....	1
2. MAXIMUM PERMISSIBLE EXPOSURE.....	2
2.1. Limit of Maximum Permissible Exposure	2
2.2. MPE Calculation Method	2
2.3. Calculated Result and Limit.....	3

History of This Test Report

REPORT NO.	VERSION	DESCRIPTION	ISSUED DATE
FA541521-02	Rev. 01	Initial issue of report	Jan. 18, 2016

1. GENERAL DESCRIPTION

1.1. EUT General Information

RF General Information			
Evaluation Mode	Frequency Range (MHz)	Operating Frequency (MHz)	Modulation Type
2.4GHz WLAN	2400-2483.5	2412-2462	802.11b: DSSS (DBPSK, DQPSK, CCK) 802.11g/n: OFDM (BPSK, QPSK, 16QAM, 64QAM) 802.11ac: OFDM (BPSK, QPSK, 16QAM, 64QAM, 256QAM)
5GHz WLAN	5150-5250 5250-5350 5470-5725 5725-5850	5180-5240 5260-5320 5500-5720 5745-5825	802.11a/n: OFDM (BPSK, QPSK, 16QAM, 64QAM) 802.11ac: OFDM (BPSK, QPSK, 16QAM, 64QAM, 256QAM)

1.2. Table for Multiple Listing and Class II Change

The model names are identical to each other in all aspects except for the following table:

Equipment	EUT	Product Name	Model Name	Internal Antenna	External Antenna	Equipped Antenna
Wireless 802.11a/AC + b/g/n Access Point	1	WS-AP3965e-FCC	31018	X	V	Set 1~11
		WS-AP3965e-ROW	31019			
	2	WS-AP3965i-FCC	31016	V	X	Set 12
		WS-AP3965i-ROW	31017			

Note: Different model names for EUT 1 (31018 and 31019) and EUT 2 (31016 and 31017) served as marketing strategy.

This product is an extension of original one reported under Sporton project number: FA541521-01

Below is the table for the change of the product with respect to the original one.

Modifications	Performance Checking
Add Band 2 and Band 3 (5250~5350 MHz, 5470~5725 MHz)	MPE (5G B2 B3)

1.3. Testing Location

Testing Location		
☐	HWA YA	ADD : No. 52, Hwa Ya 1st Rd., Kwei-Shan Hsiang, Tao Yuan Hsien, Taiwan, R.O.C. TEL : 886-3-327-3456 FAX : 886-3-327-0973
☒	JHUBEI	ADD : No.8, Lane 724, Bo-ai St., Jhubei City, HsinChu County 302, Taiwan, R.O.C. TEL : 886-3-656-9065 FAX : 886-3-656-9085

2. MAXIMUM PERMISSIBLE EXPOSURE

2.1. Limit of Maximum Permissible Exposure

(A) Limits for Occupational / Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/ cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842 / f	4.89 / f	(900 / f)*	6
30-300	61.4	0.163	1.0	6
300-1500			F/300	6
1500-100,000			5	6

(B) Limits for General Population / Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/ cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f)*	30
30-300	27.5	0.073	0.2	30
300-1500			F/1500	30
1500-100,000			1.0	30

Note: f = frequency in MHz ; *Plane-wave equivalent power density

2.2. MPE Calculation Method

The MPE was calculated at 58 cm for EUT 1 and 25 cm for EUT 2 to show compliance with the power density limit.

The following formula was used to calculate the Power Density:

$$E \text{ (V/m)} = \frac{\sqrt{30 \times P \times G}}{d} \quad \text{Power Density: } Pd \text{ (W/m}^2\text{)} = \frac{E^2}{377}$$

E = Electric field (V/m)

P = Peak RF output power (W)

G = EUT Antenna numeric gain (numeric)

d = Separation distance between radiator and human body (m)

The formula can be changed to

$$Pd = \frac{30 \times P \times G}{377 \times d^2}$$

2.3. Calculated Result and Limit

Exposure Environment: General Population / Uncontrolled Exposure

For EUT 1

For Non-Beamforming Mode

For 5GHz Band 1 and Band 4:

Antenna Type : Panel Antenna

Conducted Power for IEEE 802.11a: 19.96dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	5785	23.00	199.5262	19.9595	99.0709	0.467843	1	Complies

For 5GHz Band 2 and Band 3:

Antenna Type : Sector Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT40): 18.49dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	5550	11.50	14.1254	18.4886	70.6083	0.023605	1	Complies

For 2.4GHz Band:

Antenna Type : Sector Antenna

Conducted Power for IEEE 802.11b: 25.45 dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	2437	10.50	11.2202	25.4489	350.6592	0.093119	1	Complies

For Beamforming Mode

For 5GHz Band 1 and Band 4:

Antenna Type : Panel Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 19.71dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	5785	26.01	399.0525	19.7143	93.6336	0.884333	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

For 5GHz Band 2 and Band 3:

Antenna Type : Omni Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 17.97dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	5700	12.02	15.9243	17.9738	62.7159	0.023637	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

For 2.4GHz Band:

Antenna Type : Omni Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 24.34dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
58	2437	11.52	14.1925	24.3438	271.8811	0.091326	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

Conclusion:

Both of the WLAN 2.4GHz Band and WLAN 5GHz Band can transmit simultaneously, the formula of calculated the MPE is:

$$CPD1 / LPD1 + CPD2 / LPD2 +etc. < 1$$

CPD = Calculation power density

LPD = Limit of power density

Therefore, the worst-case situation is $0.093119 / 1 + 0.884333 / 1 = 0.977452$, which is less than "1". This confirmed that the device complies.

For EUT 2

For Non-Beamforming Mode

For 5GHz Band 1 and Band 4:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11a: 22.17dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	5785	6.25	4.2170	28.3953	691.0762	0.371241	1	Complies

For 5GHz Band 2 and Band 3:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT80): 23.70dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	5690	6.25	4.2170	23.6963	234.2210	0.125822	1	Complies

For 2.4GHz Band:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 28.63dBm

Distance (cm)	Test Freq. (MHz)	Antenna Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	2437	6.45	4.4157	28.6295	729.3666	0.410276	1	Complies

For Beamforming Mode

For 5GHz Band 1 and Band 4:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT40): 23.38dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	5785	12.09	16.1673	23.5851	228.3024	0.470197	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

For 5GHz Band 2 and Band 3:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 17.90dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	5500	12.09	16.1673	17.9006	61.6680	0.127007	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

For 2.4GHz Band:

Antenna Type : PIFA Antenna

Conducted Power for IEEE 802.11ac MCS0/Nss1 (VHT20): 23.91dBm

Distance (cm)	Test Freq. (MHz)	Directional Gain (dBi)	Antenna Gain (numeric)	The maximum combined Average Output Power		Power Density (S) (mW/cm ²)	Limit of Power Density (S) (mW/cm ²)	Test Result
				(dBm)	(mW)			
25	2437	12.04	16.0139	23.9127	246.1917	0.502227	1	Complies

Note:

$$DirectionalGain = 10 \cdot \log \left[\frac{\sum_{j=1}^{N_{SS}} \left\{ \sum_{k=1}^{N_{ANT}} g_{j,k} \right\}^2}{N_{ANT}} \right]$$

Conclusion:

Both of the WLAN 2.4GHz Band and WLAN 5GHz Band can transmit simultaneously, the formula of calculated the MPE is:

$$CPD1 / LPD1 + CPD2 / LPD2 +etc. < 1$$

CPD = Calculation power density

LPD = Limit of power density

Therefore, the worst-case situation is $0.502227 / 1 + 0.470197 / 1 = 0.972424$, which is less than "1". This confirmed that the device complies.