FCC PART 15, SUBPART C
ISEDC RSS-247, ISSUE 3, AUGUST 2023

TEST REPORT

For

Hitachi Energy USA, Inc.

3055 Orchard Drive
San Jose, 95134, CA, United States

Model: Bluefin 2G
FCC ID: P9J-642402, IC: 4751A-642402

Report Type:	Product Type:
Original Report	2.4GHz Wi-Fi Radio

Prepared By:	Arturo Reyes RF Test Engineer
Report Number:	R2408262-247
Report Date:	2025-01-16
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ACCREDITED
CERTIFICATE #3297.02

* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "*"

TABLE OF CONTENTS

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2408262-247	Original Report	2025-01-16

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report is prepared on behalf of *Hitachi Energy USA, Inc.*, and their product model: Bluefin 2G, FCC ID: P9J-642402, IC: 4751A-642402, the "EUT" as referred to in this report. The EUT is a 2.4 GHz Wi-Fi module that supports 802.11b/g/n20/n40.

Model Number	Bluefin 2G
FCC ID	P9J-642402
IC	4751A-642402
Radio Type	2.4 GHz Wi-Fi radio
Operating Frequency	2400MHz – 2462MHz
Mode	802.11b, 802.11g, 802.11n20, 802.11 n40
Antenna Gain	7.4 dBi

The data gathered was from a module sample provided by Hitachi Energy USA, Inc. with S/N: 3800012101

1.2 Objective

This report is prepared on behalf of *Hitachi Energy USA, Inc.* in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission's rules and ISEDC RSS-247 Issue 3, August 2023.

The objective is to determine compliance with FCC Part 15.247 and ISEDC RSS-247 for Antenna Requirement, RF Exposure, AC Line Conducted Emissions, Radiated & Conducted Spurious Emissions, Emission Bandwidth, Maximum Output Power, Peak Power Spectral Density, and 100 kHz Band Edges.

In order to determine compliance, the manufacturer or a contracted laboratory makes measurements and takes the necessary steps to ensure that the equipment complies with the appropriate technical standards.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product maybe which result in lowering the immunity should be checked to ensure compliance has been maintained (i.e., printed circuit board layout changes, different line filter, different power supply, harnessing and/or I/O cable changes, etc.).

1.3 Related Submittal(s)/Grant(s)

N/A

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.5 Measurement Uncertainty

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

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

1.6 Test Facility Registrations

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

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

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

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

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- ***An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02),*** in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

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

B- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03)*** to certify

- For the USA (Federal Communications Commission):
  - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
  - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
  - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
  - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
  - 2 All Scope 2-Licensed Personal Mobile Radio Services;
  - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
  - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
  - 5 All Scope 5-Licensed Fixed Microwave Radio Services
  - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
  - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
  - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
  - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
  - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
  - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
  - 1 MIC Telecommunication Business Law (Terminal Equipment):
    - All Scope A1 - Terminal Equipment for the Purpose of Calls;
    - All Scope A2 - Other Terminal Equipment
  - 2 Radio Law (Radio Equipment):
    - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
    - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
    - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01)*** to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

1 Electronics and Office Equipment:
- for Telephony (ver. 3.0)
- for Audio/Video (ver. 3.0)
- for Battery Charging Systems (ver. 1.1)
- for Set-top Boxes & Cable Boxes (ver. 4.1)
- for Televisions (ver. 6.1)
- for Computers (ver. 6.0)
- for Displays (ver. 6.0)
- for Imaging Equipment (ver. 2.0)
- for Computer Servers (ver. 2.0)

2 Commercial Food Service Equipment
- for Commercial Dishwashers (ver. 2.0)
- for Commercial Ice Machines (ver. 2.0)
- for Commercial Ovens (ver. 2.1)
- for Commercial Refrigerators and Freezers

3 Lighting Products
- For Decorative Light Strings (ver. 1.5)
- For Luminaires (including sub-components) and Lamps (ver. 1.2)
- For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
- For Integral LED Lamps (ver. 1.4)

4 Heating, Ventilation, and AC Products
- for Residential Ceiling Fans (ver. 3.0)
- for Residential Ventilating Fans (ver. 3.2)

5 Other
- For Water Coolers (ver. 3.0)

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

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

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

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

2.2 EUT Exercise Software

The exercising software used during testing was “artgui.exe”, provided by Hitachi Energy USA, Inc.. The software is compliant with the standard requirements being tested against.

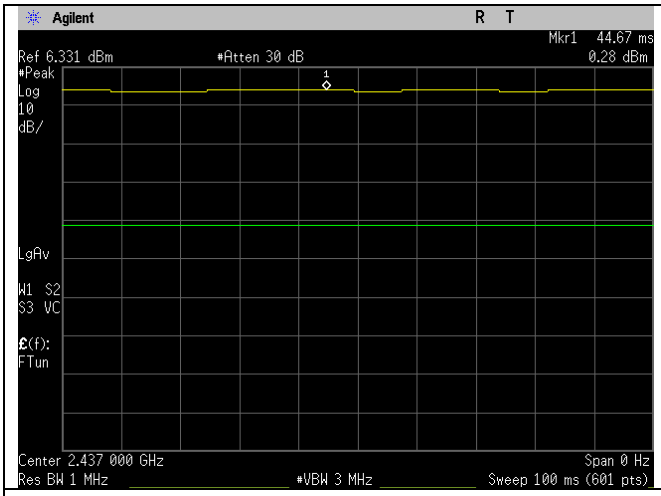
Radio	Frequency (MHz)	Mode	Power Setting	
			Port 1	Port 2
2.4 GHz Wi-Fi	2412	802.11b	26.5	26.5
	2437		28.5	28.5
	2462		26.5	26.5
	2412	802.11g	23	23
	2437		28.5	28.5
	2462		23	23
	2412	802.11n20: MCS0	20	20
	2437		21.5	21.5
	2462		20	20
	2422	802.11n40: MCS0	18	18
	2437		22	22
	2452		18	18
	2412	802.11n20: MCS8	21	21
	2437		25	25
	2462		21	21
	2422	802.11n40: MCS8	19	19
	2437		25	25
	2452		19	19

Data rates used:
802.11b: 1Mbps
802.11g: 6 Mbps
802.11n: MCS0, MCS8

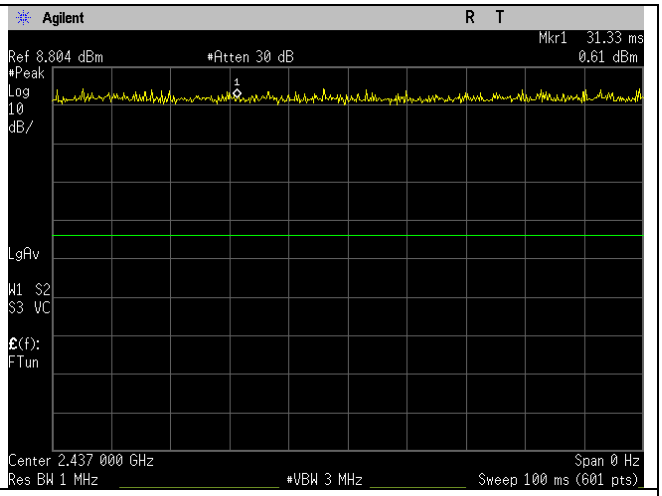
NOTE: only MCS0 configurations capable of MIMO transmission. All other configurations, SISO only.

2.3 Duty Cycle

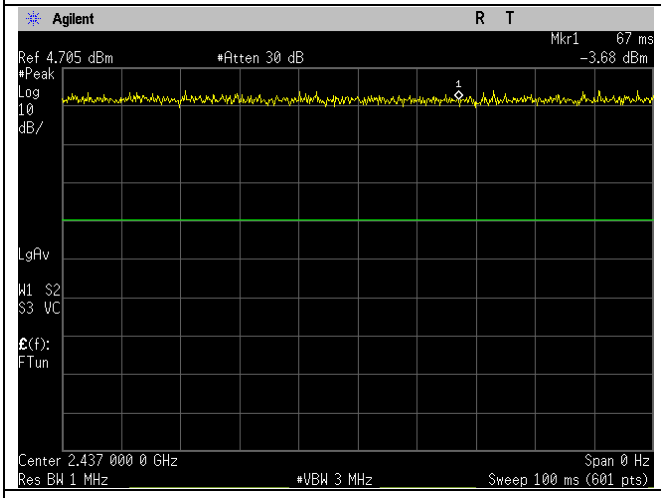
Radio	Mode	Frequency (MHz)	Duty Cycle (%)
2.4 GHz Wi-Fi	802.11b	2437	100
	802.11g	2437	100
	802.11n20: MCS0	2437	100
	802.11n40: MCS0	2437	100
	802.11n20: MCS8	2437	100
	802.11n40: MCS8	2437	100



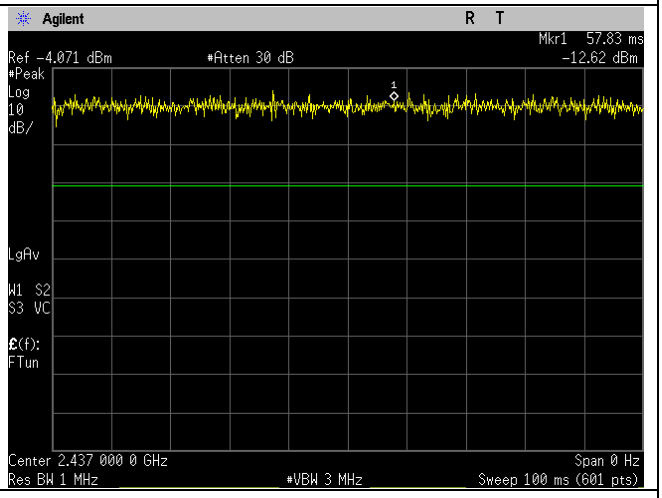
802.11b 2437 MHz Port 1



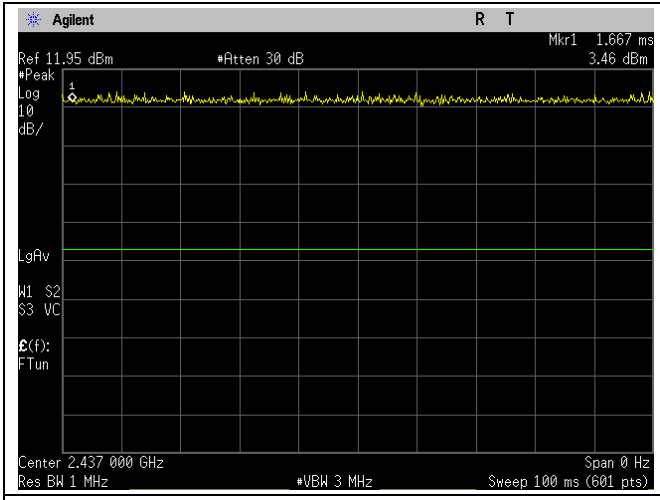
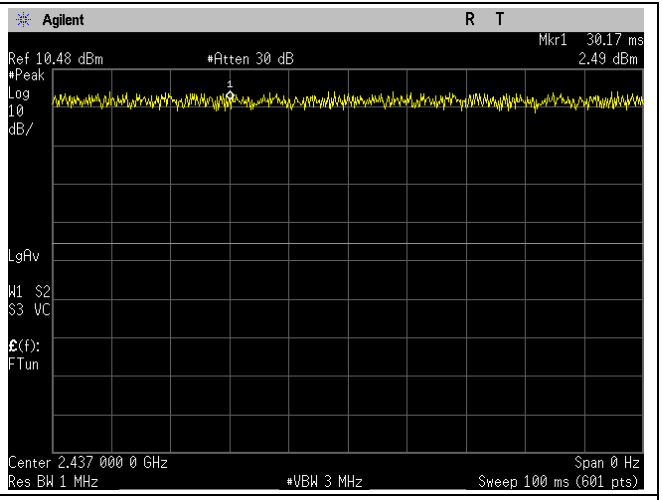
802.11g 2437 MHz Port 1



802.11n20, MCS0, 2437 MHz Port 1



802.11n40, MCS0, 2437 MHz Port 1

	
802.11n20, MCS8, 2437 MHz Port 1	802.11n40, MCS8, 2437 MHz Port 1

2.4 Equipment Modification

No modifications were made to the EUT during testing.

2.5 Local Support Equipment

N/A

2.6 Remote Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6440	4252N72

2.7 Power Supply and Line Filters

Manufacturer	Description	Model	Serial Number
ELPAC Power Systems	10-pin header AC adapter	FWE050024A	0083366

2.8 Interface Ports and Cabling

Cable Description	Length (m)	From	To
Ethernet	> 1	EUT	Laptop

3 Summary of Test Results

FCC & ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1091, §15.247(i) ISEDC RSS-102	RF Exposure	Compliant
FCC §15.207 ISEDC RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247(d) ISEDC RSS-247 §5.5 ISEDC RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISEDC RSS-247 §5.2 RSS-Gen §6.7	6 dB & 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISEDC RSS-247 §5.4	Maximum Output Power	Compliant
FCC §15.247(e) ISEDC RSS-247 §5.2(2)	Peak Power Spectral Density	Compliant
FCC §2.1051, §15.247 (d) ISEDC RSS-247 §5.5	Spurious Emissions at Antenna Terminal (dBc)	Compliant

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

4 FCC §15.203 & ISEDC RSS-Gen §6.8 – Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

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

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotopically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

External/Internal/ Integral	Part Number	Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
External	SF-245W-R	Omni-Directional	2400-2500	7.4

Note: Device uses unique MMCX ports on board by which the antenna will be connected in order to meet 15.203

Note: antenna gain info is information provided by the customer.

5 FCC §2.1091, FCC §15.247(i) & ISEDC RSS-102 – RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i), Radio frequency devices operating under the provisions of this part are subject to the radio frequency radiation exposure requirements specified in §§ 1.1307(b), 1.1310, 2.1091, and 2.1093 of this chapter, as appropriate. Applications for equipment authorization of mobile or portable devices operating under this section must contain a statement confirming compliance with these requirements. Technical information showing the basis for this statement must be submitted to the Commission upon request.

According to FCC §2.1091 and §1.1310(e)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

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

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

According to ISED RSS-102 Issue 6:

Table 7: RF field strength and power density limits for devices used by the general public (uncontrolled environment)

Frequency range (MHz)	Electric field (V_{RMS}/m)	Magnetic field (A_{RMS}/m)	Power density (W/m^2)	Reference period (minutes)
10-20	27.46	0.0728	2	6
20-48	$58.07 / f^{0.25}$	$0.1540 / f^{0.25}$	$8.944 / f^{0.5}$	6
48-300	22.06	0.05852	1.291	6
300-6000	$3.142 f^{0.3417}$	$0.008335 f^{0.3417}$	$0.02619 f^{0.6834}$	6
6000-15000	61.4	0.163	10	6
15000-150000	61.4	0.163	10	$616000/ f^{1.2}$
150000-300000	$0.158 f^{0.5}$	$4.21\times10^{-4} f^{0.5}$	$6.67\times10^{-5} f$	$616000/ f^{1.2}$

5.2 MPE Prediction

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

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

Where: S = power density
P = power input to antenna
G = power gain of the antenna in the direction of interest relative to an isotropic radiator
R = distance to the center of radiation of the antenna

5.3 FCC MPE Result

802.11n20:MCS0, 2437 MHz

Maximum output power at antenna input terminal (dBm):	25.4
Maximum output power at antenna input terminal (mW):	346.74
Prediction distance (cm):	25
Prediction frequency (MHz):	2437
Maximum Directional Antenna Gain, typical (dBi):	10.4
Maximum Antenna Gain (numeric):	10.96
Power density of prediction frequency at 25.0 cm (mW/cm^2):	0.484
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm^2):	1.0

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 25 cm is 0.484 mW/cm^2. Limit is 1 mW/cm^2.

5.4 IC MPE Result

802.11n20:MCS0, 2437 MHz

Maximum output power at antenna input terminal (dBm):	25.4
Maximum output power at antenna input terminal (W):	0.34674
Prediction distance (m):	0.25
Prediction frequency (MHz):	2437
Maximum Directional Antenna Gain, typical (dBi):	10.4
Maximum Antenna Gain (numeric):	10.96
Power density of prediction frequency at 0.25m (W/m^2):	4.84
IC MPE limit for uncontrolled exposure at prediction frequency (W/m^2):	5.404

The device is compliant with the requirement IC MPE limit for uncontrolled exposure. The maximum power density at the distance of 0.25m is 4.84 W/m^2. Limit is 5.404 W/m^2.

6 FCC §15.207 & ISEDC RSS-Gen §8.8 – AC Line Conducted Emissions

6.1 Applicable Standards

As per FCC §15.207 and ISEDC RSS-Gen Section 8.8: Conducted limits

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

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

Note1: Decreases with the logarithm of the frequency.
Note2: A linear average detector is required

6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.207 and ISEDC RSS-Gen §8.8 limits.

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

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

6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cords of support equipment were connected to LISN-2.

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

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

6.4 Corrected Amplitude & Margin Calculation

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

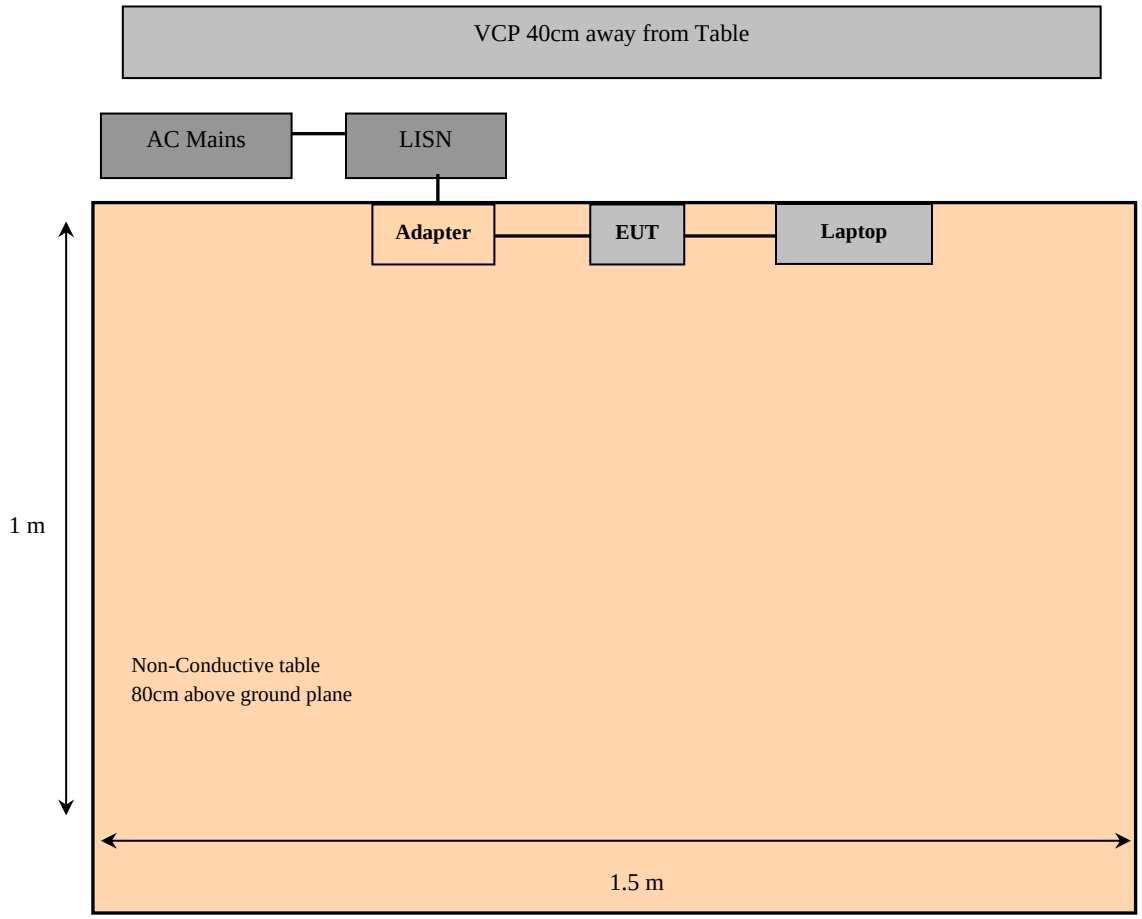
$$CA = Ai + CL + Atten$$

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

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

$$Margin = Corrected\ Amplitude - Limit$$

6.5 Test Setup Block Diagram



6.6 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
124	Rohde & Schwarz	Receiver, EMI Test	ESCI 1166.5950K03	100044	2024-06-19	1 year
681	Rohde & Schwarz	Impulse Limiter	ESH3-Z2	101962	2024-09-17	6 months
725	Solar Electronics Company	High Pass Filter	Type 7930-100	7930150203	2024-09-17	6 months
1425	Pasternack	Ground Plane RG58 Coaxial Cable	PE3441-500CM	NA	2024-07-12	6 months
732	Fischer Custom Communications, Inc.	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2024-09-13	1 year
734	Fischer Custom Communications, Inc.	LISN	FCC-LISN-50-25-2-10-CISPR16	160131	2024-03-05	1 year
348	California Instruments	AC Power Source	5001ix-208	57079	N/R	N/R

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

6.7 Test Environmental Conditions

Temperature:	22.9 ºC
Relative Humidity:	54.5 %
ATM Pressure:	102.1 kPa

The testing was performed by Steven Lianto on 2024-09-27 at the Ground Plane test site

6.8 Summary of Test Results

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

802.11b, 2437 MHz, Port 2

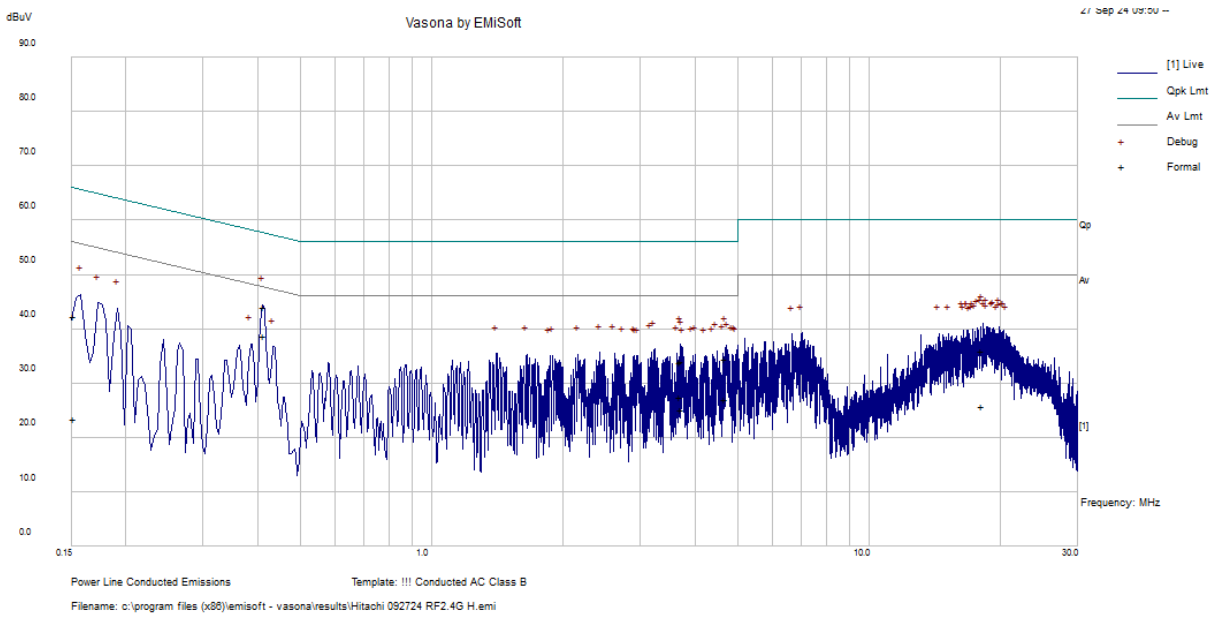
Worst Case – AC Line: 120V, 60Hz			
Margin (dB)	**Frequency (MHz)**	**Conductor Mode (Hot/Neutral)**	**Range (MHz)**
8.82	0.412	Hot	0.15 to 30

Please refer to the tables and plots in the next section for detailed test results.

6.9 Conducted Emissions Test Plots and Data

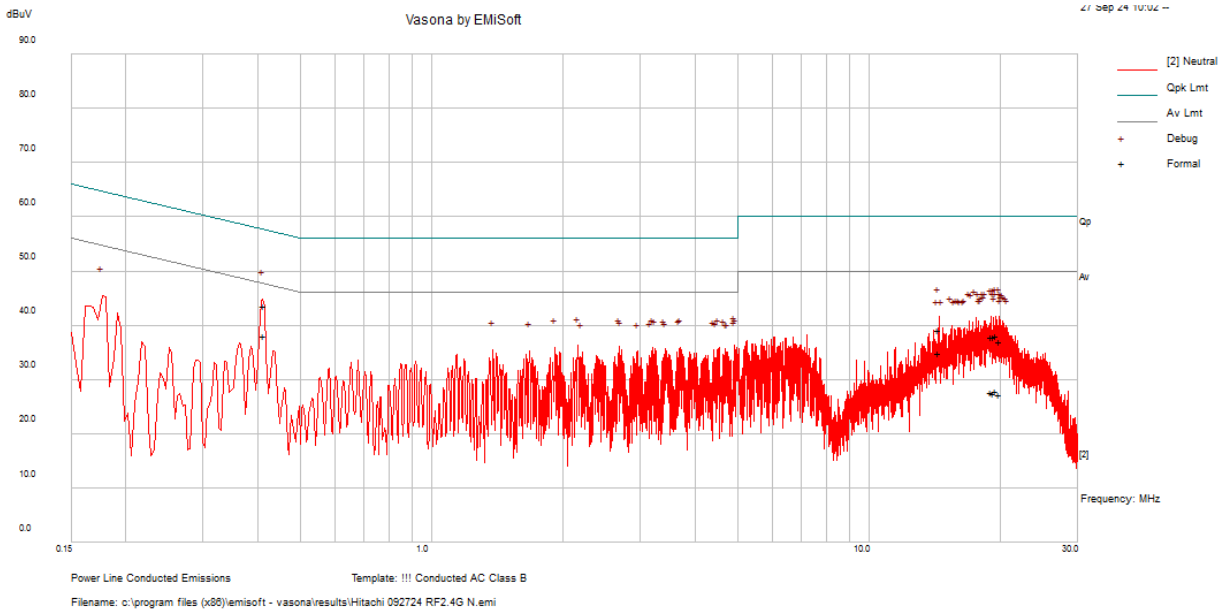
Worst Mode: 802.11b, 2437 MHz, Port 2

AC Line (via AC/DC Adapter): 120V, 60Hz – Hot Conductor



Frequency (MHz)	Ai. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBµV)	Limit (dBµV)	Margin (dB)	Detector
0.412969	33.79	10.27	44.06	57.59	-13.53	QP
3.708033	23.75	10.12	33.87	56	-22.13	QP
4.69919	24.41	10.13	34.54	56	-21.46	QP
18.18699	25.66	10.36	36.02	60	-23.98	QP
0.151955	30.92	11.31	42.23	65.89	-23.66	QP
3.733974	23.93	10.11	34.05	56	-21.95	QP
0.412969	28.49	10.27	38.77	47.59	-8.82	Ave
3.708033	17.36	10.12	27.48	46	-18.52	Ave
4.69919	16.97	10.13	27.1	46	-18.9	Ave
18.18699	15.31	10.36	25.67	50	-24.33	Ave
0.151955	12.02	11.31	23.33	55.89	-32.57	Ave
3.733974	15	10.11	25.12	46	-20.88	Ave

AC Line (via AC/DC Adapter): 120V, 60Hz – Neutral Conductor



Frequency (MHz)	Ai. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBµV)	Limit (dBµV)	Margin (dB)	Detector
0.412933	33.33	10.27	43.61	57.59	-13.98	QP
14.42749	28.94	10.28	39.22	60	-20.78	QP
19.51704	27.7	10.38	38.08	60	-21.92	QP
19.85563	26.7	10.39	37.09	60	-22.91	QP
19.00099	27.57	10.36	37.94	60	-22.06	QP
19.23962	27.47	10.37	37.84	60	-22.16	QP
0.412933	27.69	10.27	37.97	47.59	-9.62	Ave
14.42749	24.54	10.28	34.82	50	-15.18	Ave
19.51704	17.58	10.38	27.96	50	-22.04	Ave
19.85563	16.74	10.39	27.13	50	-22.87	Ave
19.00099	17.27	10.36	27.64	50	-22.36	Ave
19.23962	16.99	10.37	27.37	50	-22.63	Ave

7 FCC §15.35(b), §15.205, §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 – Spurious Radiated Emissions

7.1 Applicable Standards

As per FCC §15.35(b): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

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

MHz	MHz	MHz	GHz
0.090 – 0.110 0.495 – 0.505 2.1735 – 2.1905 4.125 – 4.128 4.17725 – 4.17775 4.20725 – 4.20775 6.215 – 6.218 6.26775 – 6.26825 6.31175 – 6.31225 8.291 – 8.294 8.362 – 8.366 8.37625 – 8.38675 8.41425 – 8.41475 12.29 – 12.293 12.51975 – 12.52025 12.57675 – 12.57725 13.36 – 13.41	16.42 – 16.423 16.69475 – 16.69525 25.5 – 25.67 37.5 – 38.25 73 – 74.6 74.8 – 75.2 108 – 121.94 123 – 138 149.9 – 150.05 156.52475 – 156.52525 156.7 – 156.9 162.0125 –167.17 167.72 – 173.2 240 – 285 322 – 335.4 399.9 – 410 608 – 614	960 – 1240 1300 – 1427 1435 – 1626.5 1645.5 – 1646.5 1660 – 1710 1718.8 – 1722.2 2200 – 2300 2310 – 2390 2483.5 – 2500 2690 – 2900 3260 – 3267 3.332 – 3.339 3 3458 – 3 358 3.600 – 4.400	4. 5 – 5. 15 5. 35 – 5. 46 7.25 – 7.75 8.025 – 8.5 9.0 – 9.2 9.3 – 9.5 10.6 – 12.7 13.25 – 13.4 14.47 – 14.5 15.35 – 16.2 17.7 – 21.4 22.01 – 23.12 23.6 – 24.0 31.2 – 31.8 36.43 – 36.5 Above 38.6

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

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

As per FCC §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, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. 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) (see §15.205(c).

As per ISEDC RSS-247 §5.5,

in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

As per ISEDC RSS-Gen §8.9,

Except where otherwise indicated in the applicable RSS, radiated emissions shall comply with the field strength limits shown in table 5 and table 6. Additionally, the level of any transmitter unwanted emission shall not exceed the level of the transmitter's fundamental emission.

Table 5 – General field strength limits at frequencies above 30 MHz

Frequency (MHz)	Field Strength (µV/m at 3 m)
30 – 88	100
88 – 216	150
216 – 960	200
Above 960	500

Table 6 – General field strength limits at frequencies below 30 MHz

Frequency	Field Strength (micro volts/meter)	Measurement Distance (meters)
9 – 490 kHz[Note 1]	6.37/F (F in kHz)	300
490 – 1705 kHz	63.7/F (F in kHz)	30
1.705 – 30 MHz	0.08	30

Note 1: The emission limits for the ranges 9-90 kHz and 110-490 kHz are based on measurements employing a linear average detector.

As per ISEDC RSS-Gen §8.10(c),

Unwanted emissions that do not fall within the restricted frequency bands listed in table 7 shall comply either with the limits specified in the applicable RSS or with those specified in table 5 and table 6.

Table 7 – Restricted frequency bands[Note 1]

MHz	MHz	GHz
0.090 – 0.110	149.9 – 150.05	9.0 – 9.2
0.495 – 0.505	156.52475 – 156.52525	9.3 – 9.5
2.1735 – 2.1905	156.7 – 156.9	10.6 – 12.7
3.020 – 3.026	162.0125 –167.17	13.25 – 13.4
4.125 – 4.128	167.72 – 173.2	14.47 – 14.5
4.17725 – 4.17775	240 – 285	15.35 – 16.2
4.20725 – 4.20775	322 – 335.4	17.7 – 21.4
5.677 – 5.683	399.9 – 410	22.01 – 23.12
6.215 – 6.218	608 – 614	23.6 – 24.0
6.26775 – 6.26825	960 – 1427	31.2 – 31.8
6.31175 – 6.31225	1435 – 1626.5	36.43 – 36.5
8.291 – 8.294	1645.5 – 1646.5	Above 38.6
8.362 – 8.366	1660 – 1710	
8.37625 – 8.38675	1718.8 – 1722.2	
8.41425 – 8.41475	2200 – 2300	
12.29 – 12.293	2310 – 2390	
12.51975 – 12.52025	2483.5 – 2500	
12.57675 – 12.57725	2655 – 2900	
13.36 – 13.41	3260 – 3267	
16.42 – 16.423	3332 – 3339	
16.69475 – 16.69525	3345.8 – 3358	
16.80425 – 16.80475	3500 – 4400	
25.5 – 25.67	4500 – 5150	
37.5 – 38.25	5350 – 5460	
73 – 74.6	7250 – 7750	
74.8 – 75.2	8025 – 8500	
108 – 138		

Note 1: Certain frequency bands listed in table 7 and in bands above 38.6 GHz are designated for license-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

7.2 Test Setup

The radiated emissions tests were performed in the 5-meter chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC §15.247 and ISEDC RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

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

7.3 Test Procedure

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

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meters, and the EUT was placed on a turntable, which was 0.8 meters and 1.5 meters above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 3MHz / Sweep = Auto
(2) Average: RBW = 1MHz / VBW = 3MHz / Sweep = Auto/Sweep Count = 100

7.4 Corrected Amplitude and Margin Calculation: Radiated

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

CA = S.A. Reading + Correction Factor

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

Correction Factor = AF + CL + Atten – Ga

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

Margin = Corrected Amplitude – Limit

For emission above 1 GHz,

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

CA = Ai + AF + CL + Atten – Ga

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

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

Margin = Corrected Amplitude – Limit

7.5 Conversion of Amplitudes and Offset Calculations: Conducted

The measurements are performed conducted in lieu of radiated as permitted by ANSI C63.10-2013. The formulas presented below were used in making such conversions. Below conversions will result in units of dBuV/m at 3meters.

Above 1 GHz:

$$E[dB\mu V/m] = EIRP[dBm] - 20 \log (d[m]) + 104.77$$

where E is field strength and d is distance at which the field strength limit is specified in the applicable requirements.

$$E[dB\mu V/m] = EIRP[dBm] + 95.2$$

for d = 3 m.

Straight conversion between E[dBuV/m] and EIRP[dBm} = -107, thus offset for dBuV/m at 3meters is

$$E[dB\mu V/m] = EIRP[dBm] + 95.2 – 107 + \text{Antenna Gain (dBi)} + \text{Attenuator (dB)} + \text{Cable Loss (dB)}$$

Below 1 GHz:

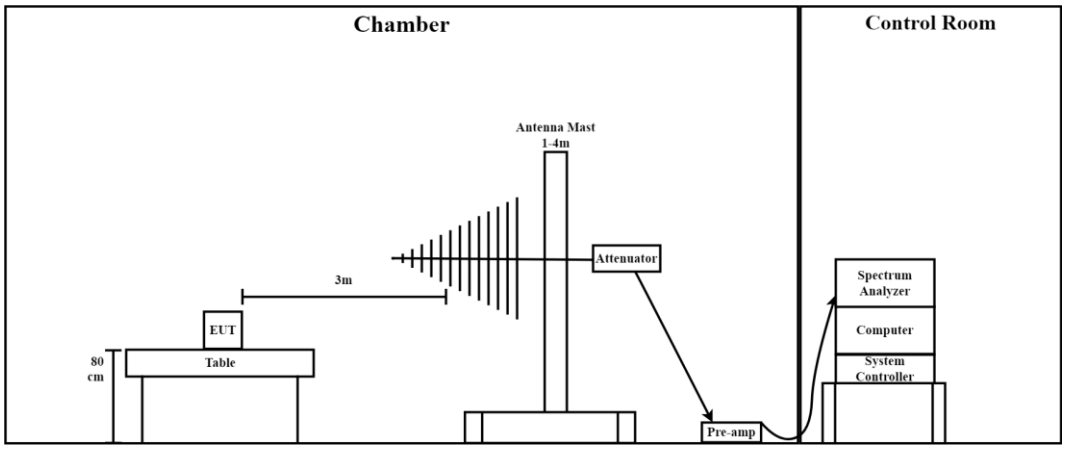
The formula bove is true in addition to adding ground plane contribution of 4.7 dB, thus offset for dBuV/m at 3meters is

$$E[dB\mu V/m] = EIRP[dBm] + 95.2 – 107 + 4.7 + \text{Antenna Gain (dBi)} + \text{Attenuator (dB)} + \text{Cable Loss (dB)}$$

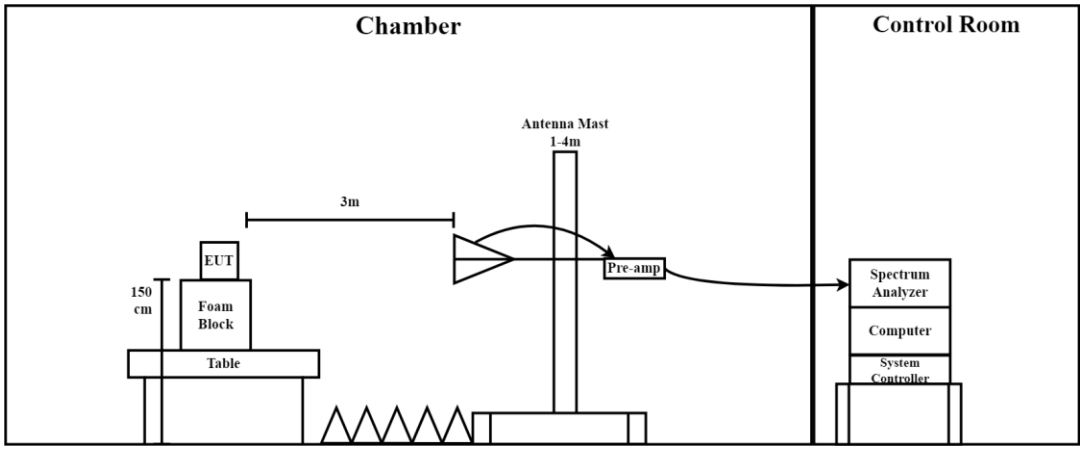
Note: For MIMO configurations, 3dB is added.

7.6 Test Setup Block Diagram

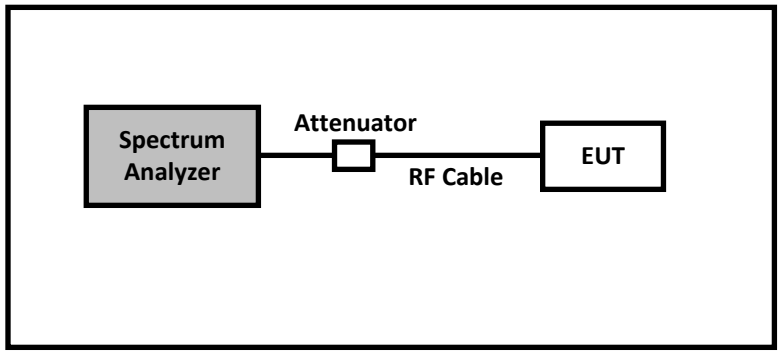
Below 1 GHz



Above 1 GHz



Conducted Spurious Emission



7.7 Test Equipment List and Details

Radiated:

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
327	Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/R
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	N/R	N/R
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/R
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2024-06-14	1 year
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2024-08-30	6 months
321	Sunol Sciences	Biconilog Antenna	JB3	A020106-2; 1504	2023-12-18	2 years
1245	-	6dB Attenuator	PE7390-6	01182018A	2023-12-18	2 years
1246	Hewlet Packard	RF Limiter	11867A	01734	2024-04-09	6 months
1248	Pasternack	RG214 COAX Cable	PE3062	-	2024-04-04	6 months
1249	Time microwave	LMR-400 Cable Dc-3 GHz	AE13684	2k80612-5 6fts	2024-04-09	6 months
1359	Pasternack	N 600in RF Cable	PE3496LF-600	-	2024-07-26	6 months
1192	ETS Lindgren	Horn Antenna	3117	00218973	2022-09-29	2 years
1295	Carlisle	10m Ultra Low Loss Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2024-05-01	6 months
1397	Mini Circuit	CBL ASSY 2.92MM PLUG TO PLUG 12"	FL086-12KM+	QN2318110-2318	2024-08-16	6 months
1449	BACL	100 MHz – 18 GHz Preamplifier	BACL1313-A100M18G	4052472	2024-08-19	6 months
1334	Micro-Tronics	Notch Filter	BRM50702	G361	2024-01-05	1 year
90	Wisewave	Horn Antenna	ARH-4223-02	10555-01	2023-05-02	2 years
1355	Megaphase	2.92mm 236in RF Cable DC to 40GHz	GC12-K1K1-236-H	1 GVT4 20554701 001	2024-02-27	1 year
1394	Mini Circuit	CBL ASSY 2.92MM PLUG TO PLUG 12"	FL086-12KM+	QN2318110-2318	2024-08-16	6 months
1451	BACL	18 – 40 GHz Preamplifier	BACL-1313-A1840	4052432	2024-08-16	6 months

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

Conducted:

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
1506	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
1507	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
-	-	10 dB attenuator	-	-	Each Time[1]	Each Time[1]

Radiated Retest performed on 2025-02-27:

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
310	Rohde & Schwarz	EMI test receiver	ESCI 1166.5950.03	100338	2024-05-29	1 year
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2024-08-30	6 months
321	Sunol Sciences	Biconilog Antenna	JB3	A020106-2; 1504	2023-12-18	2 years
1245	-	6dB Attenuator	PE7390-6	01182018A	2023-12-18	2 years
1246	Hewlet Packard	RF Limiter	11867A	01734	2024-04-09	6 months
1248	Pasternack	RG214 COAX Cable	PE3062	-	2024-04-04	6 months
1249	Time microwave	LMR-400 Cable Dc-3 GHz	AE13684	2k80612-5 6fts	2024-04-09	6 months
1456	Pasternack	11m LMR-400 RF Cable	PE3C0033-1100CM	-	2025-01-27	6 months
327	Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/R
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	N/R	N/R
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/R

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

7.8 Test Environmental Conditions

	Radiated	Conducted
Temperature:	20–25 ºC	21–23 ºC
Relative Humidity:	30–50 %	32–48 %
ATM Pressure:	102.8 kPa	102.5 kPa

The radiated testing was performed by Arturo Reyes from 2024-09-03 and 2024-09-17 to 2024-09-23 in 5m chamber 3.
The conducted testing was performed by Arturo Reyes from 2024-09-20 to 2024-09-26 and 2024-09-30 to 2024-10-03 in RF Site.
The conducted testing for MCS8 was performed by Arturo Reyes on 2024-10-22 at RF test site.
The 30 MHz – 1 GHz radiated testing for 802.11g middle & high channel was performed by Arturo Reyes on 2025-02-27 in 5m-chamber 3.

7.9 Summary of Test Results

According to the data hereinafter, the EUT complied with the FCC Part 15.205, 15.209, 15.247 and ISEDC RSS-247, RSS-GEN standards' radiated emissions limits, and had the worst margin of:

Worst Case – Mode: Transmitting			
Margin (dB)	**Frequency (MHz)**	**Polarization (Horizontal/Vertical)**	**Configuration**
-0.34	629.9825	Horizontal	802.11b 2462 MHz

For Conducted Results:
Please refer to Annex E for the Conducted Spurious Emissions plots.
Please refer to Annex F for Band Edge Measurements.

For Radiated Results:
Please refer to the tables and plots in the next section for detailed test results.

7.10 Radiated Emissions Test Results

Note 1: Port 2 was tested since it outputs higher power than Port 1 (refer to Section 9: Maximum Output Power).

Note 2: The test data presented below are the radiated cabinet emissions.
For conducted in-lieu of radiated measurements performed at the antenna port, please refer to Annex E & F.

Note 3: The EUT is not transmitting at below 30 MHz, thus 9 kHz to 30 MHz was not evaluated for Spurious Emissions.

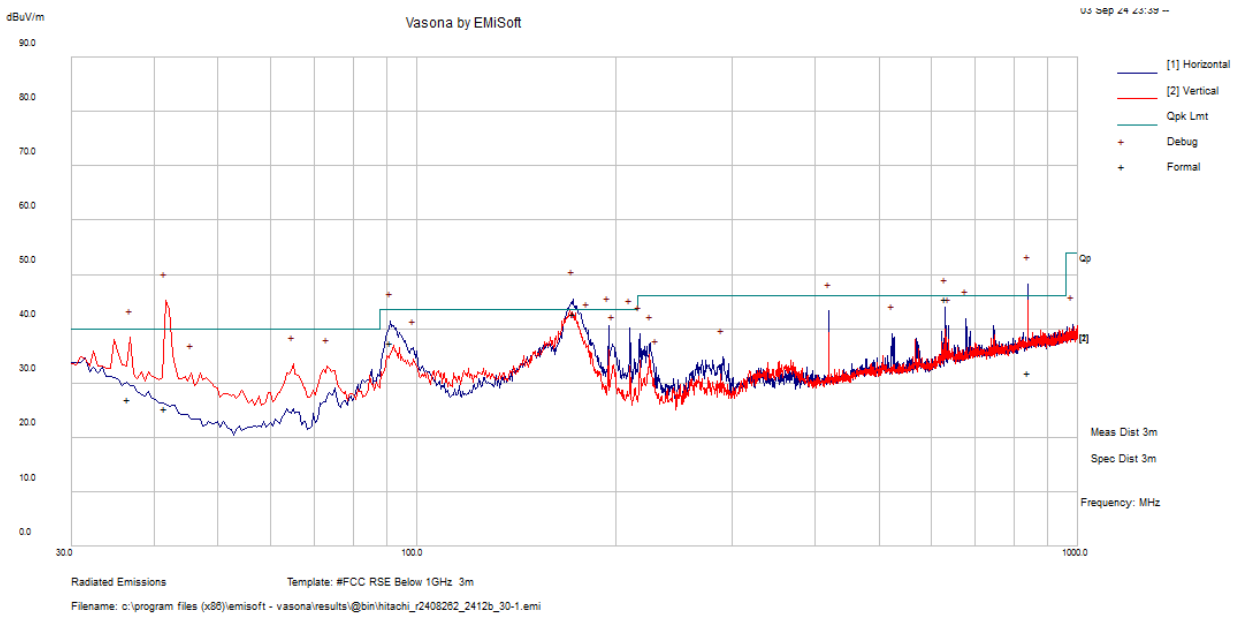
Note 4: Pre-scan was performed in order to determine worst-case orientation of device with respect to measurement antenna in the X/Y/Z axis. Plots/data shown represent measurements made in worst-case orientation.

Note 4: For all peaks exceeding the limit line in the graph that fall out of restricted bands, 30dBc limit (FCC 15.247(d)/RSS-247 5.5) was instead applied.
i.e.: Fundamental field strength measured for 802.11b middle channel: 122.8 dBµV/m @3m
Non-Restricted Band Limit: (122.8dBµV/m @3m) – 30dB = 92.8dBuV/m @3m)

Mode + Channel	Fundamental Field Strength [dBµV/m@3m]	Non-Restricted Band Limit [dBµV/m@3m]
802.11b 2437 MHz	122.8	92.8
802.11b 2462 MHz	120.4	90.4
802.11g 2412 MHz	119.5	89.5
802.11g 2437 MHz	122.2	92.2
802.11g 2462 MHz	117.9	87.9

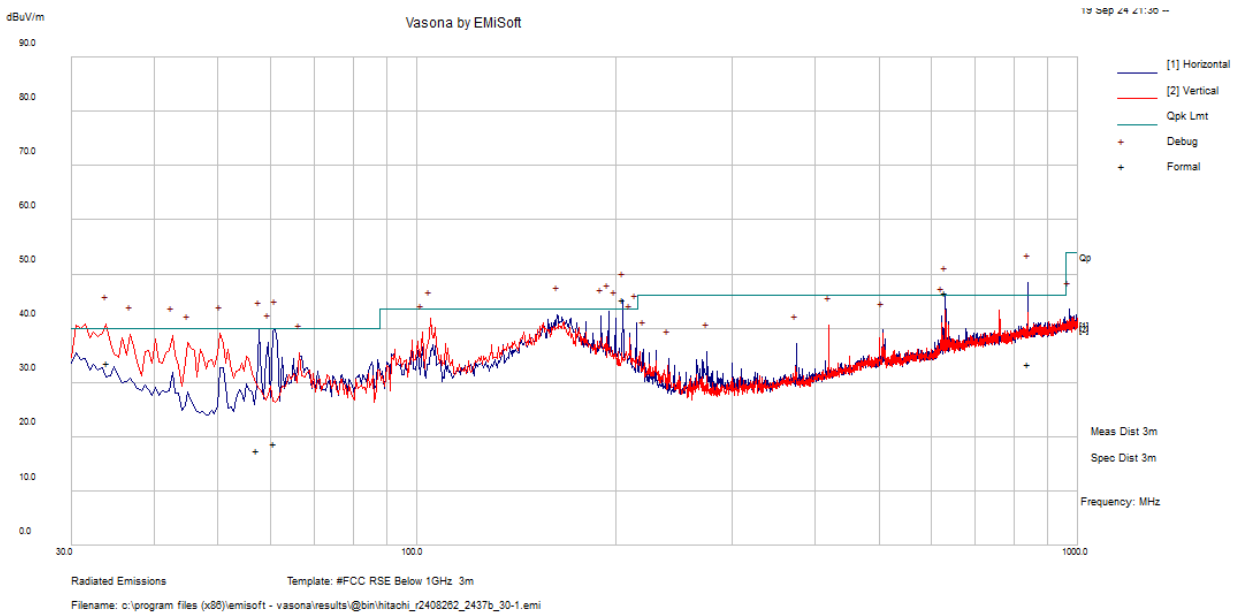
1) 30 MHz – 1 GHz, Measured at 3 meters

802.11b, Channel 2412 MHz



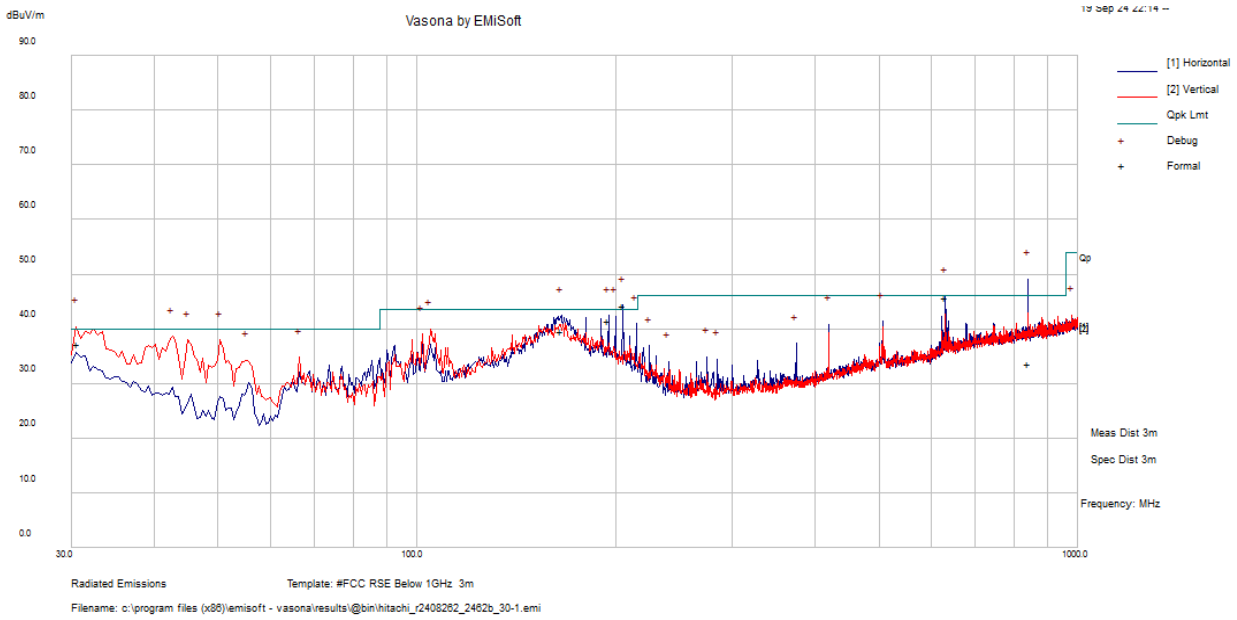
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
41.5155	33.99	-8.73	25.26	104	V	86	40	-14.74	QP
840.1965	28.07	3.76	31.82	230	H	97	46	-14.18	QP
172.2875	51.78	-8.94	42.84	145	H	288	43.5	-0.66	QP
36.55475	32.17	-5.26	26.92	109	V	266	40	-13.08	QP
630.004	44.46	0.99	45.45	127	H	107	46	-0.55	QP
91.29675	49.95	-12.61	37.33	223	H	289	43.5	-6.17	QP

802.11b, Channel 2437 MHz



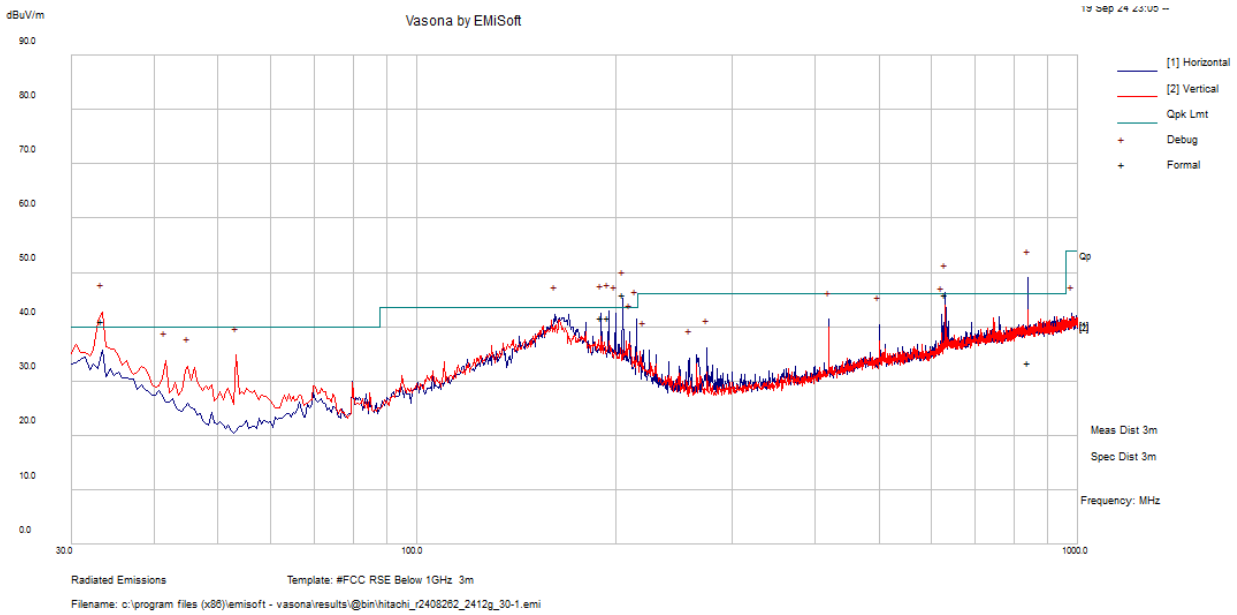
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
840.66	27.75	5.75	33.49	233	H	292	46	-12.51	QP
204.9975	54.03	-8.78	45.26	179	H	7	92.8	-47.54	QP
34.073	37.07	-3.48	33.59	100	V	319	40	-6.41	QP
630.015	43.59	2.93	46.52	116	H	272	92.8	-46.28	QP
60.8555	32.09	-13.36	18.73	225	H	324	40	-21.27	QP
57.40725	31.19	-13.63	17.55	102	H	324	40	-22.45	QP

802.11b, Channel 2462 MHz



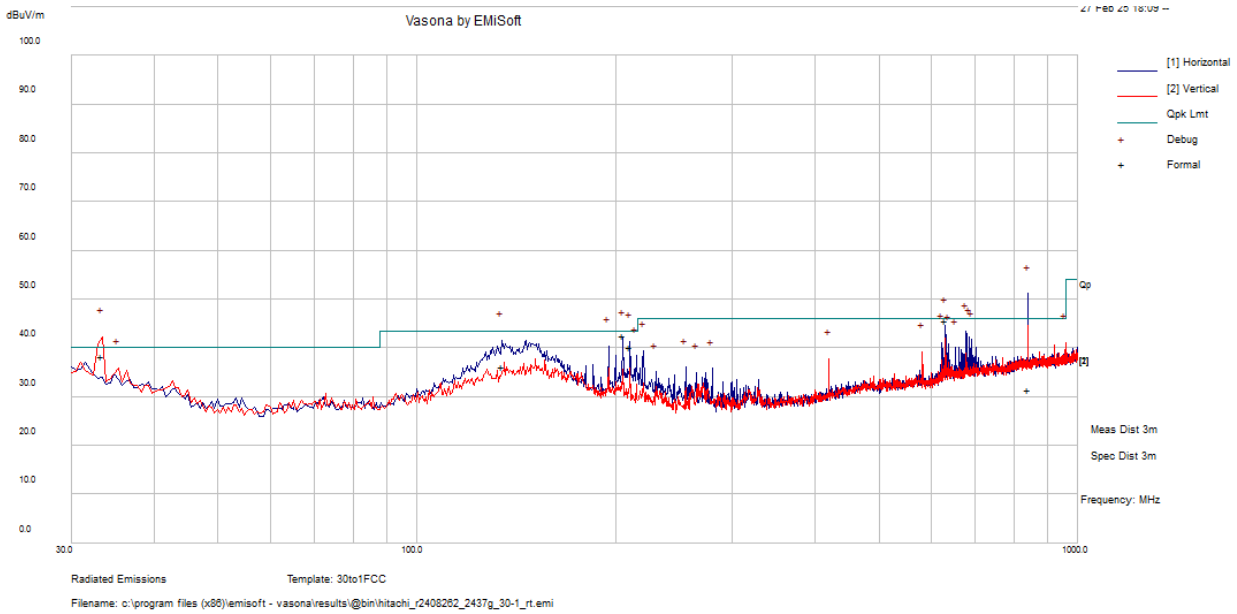
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
840.2625	27.78	5.75	33.53	162	H	53	46	-12.47	QP
204.9925	52.94	-8.77	44.17	181	H	20	90.4	-46.23	QP
30.644	38.28	-1.1	37.17	100	V	53	40	-2.83	QP
629.9825	42.73	2.93	45.66	112	H	280	46	-0.34	QP
194.9813	49.01	-7.6	41.41	128	H	7	43.5	-2.09	QP
165.0755	47.38	-7.89	39.49	208	H	255	43.5	-4.01	QP

802.11g, Channel 2412 MHz



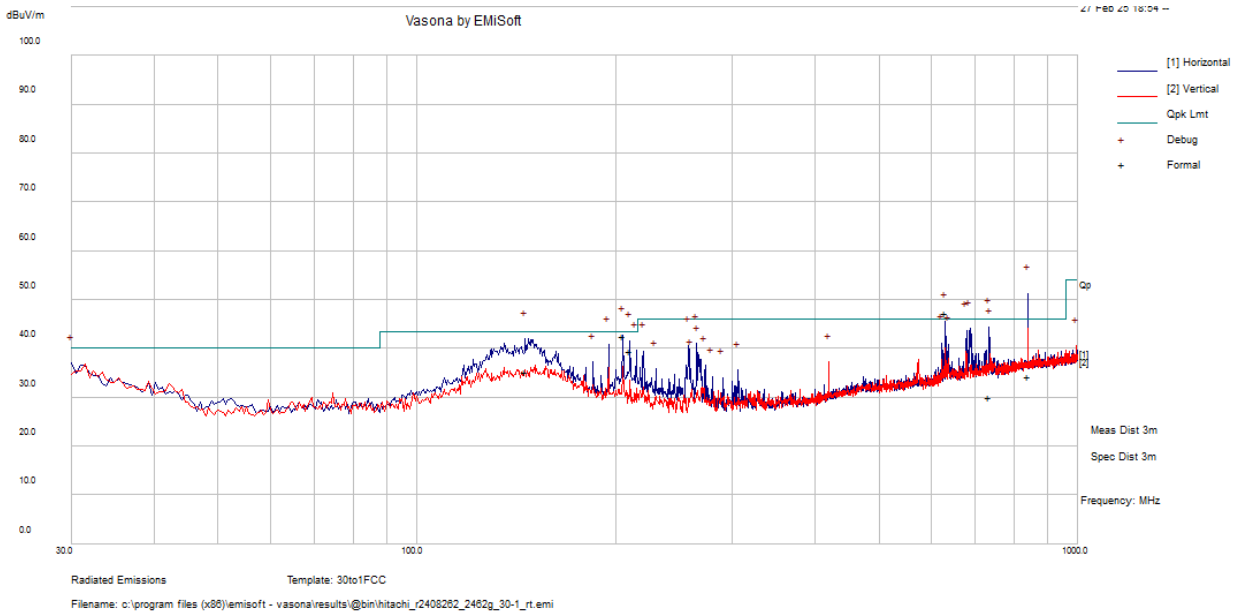
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
840.2243	27.66	5.75	33.41	121	H	360	46	-12.59	QP
33.31525	44.09	-3.03	41.06	100	V	170	89.5	-48.44	QP
205.003	54.61	-8.78	45.84	154	H	352	89.5	-43.66	QP
630.0273	43.08	2.93	46.01	128	H	269	89.5	-43.49	QP
195.0073	49.28	-7.6	41.69	184	H	333	43.5	-1.81	QP
190.0038	50.07	-8.35	41.71	111	H	7	43.5	-1.79	QP

802.11g, Channel 2437 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
840.39275	28.05	3.44	31.49	121	H	162	46	-14.51	QP
33.29975	41.35	-3.03	38.32	100	V	67	40	-1.68	QP
629.9805	44.71	0.84	45.55	125	H	126	46	-0.45	QP
205.00225	52.03	-9.42	42.61	148	H	16	43.5	-0.89	QP
134.41625	43.02	-6.95	36.07	217	H	285	43.5	-7.43	QP
209.97925	50.14	-9.94	40.2	163	H	208	43.5	-3.3	QP

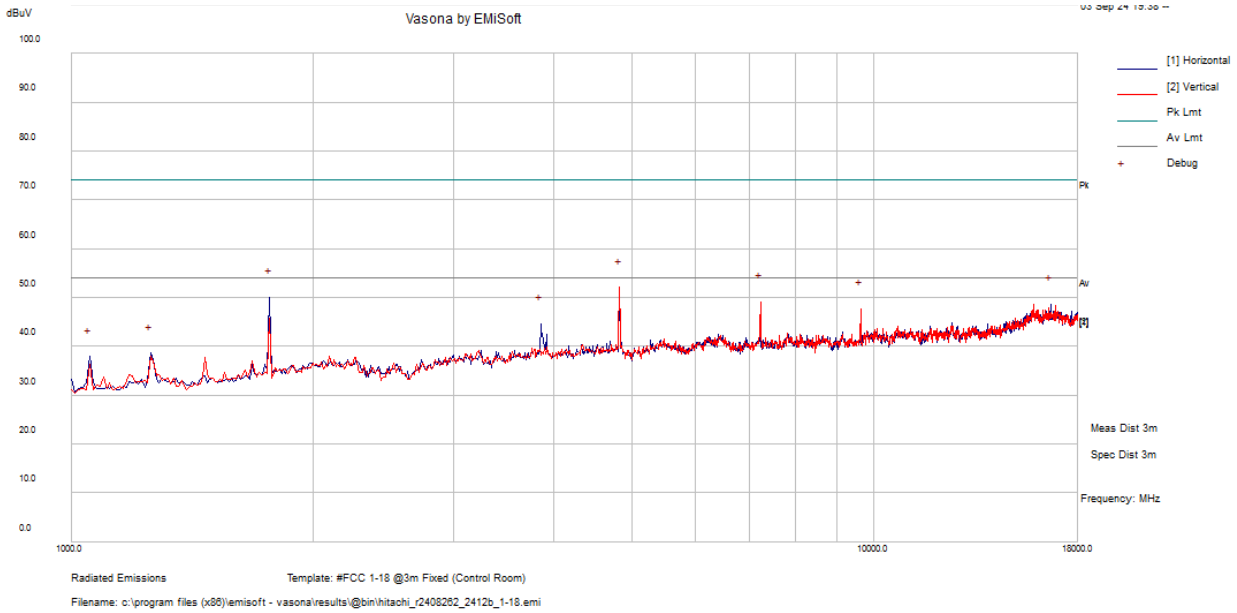
802.11g, Channel 2462 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
840.27825	30.9	3.44	34.34	113	H	99	46	-11.66	QP
629.9795	46.52	0.84	47.36	146	H	283	87.9	-40.54	QP
205.0005	51.92	-9.42	42.5	184	H	7	43.5	-1	QP
145.875	43.06	-7.85	35.21	229	H	107	43.5	-8.29	QP
733.08475	28	2.03	30.03	171	H	26	46	-15.97	QP
210.01575	49.34	-9.94	39.4	129	H	353	43.5	-4.1	QP
840.27825	30.9	3.44	34.34	113	H	99	46	-11.66	QP

2) 1 GHz – 18 GHz, Measured at 3 meter

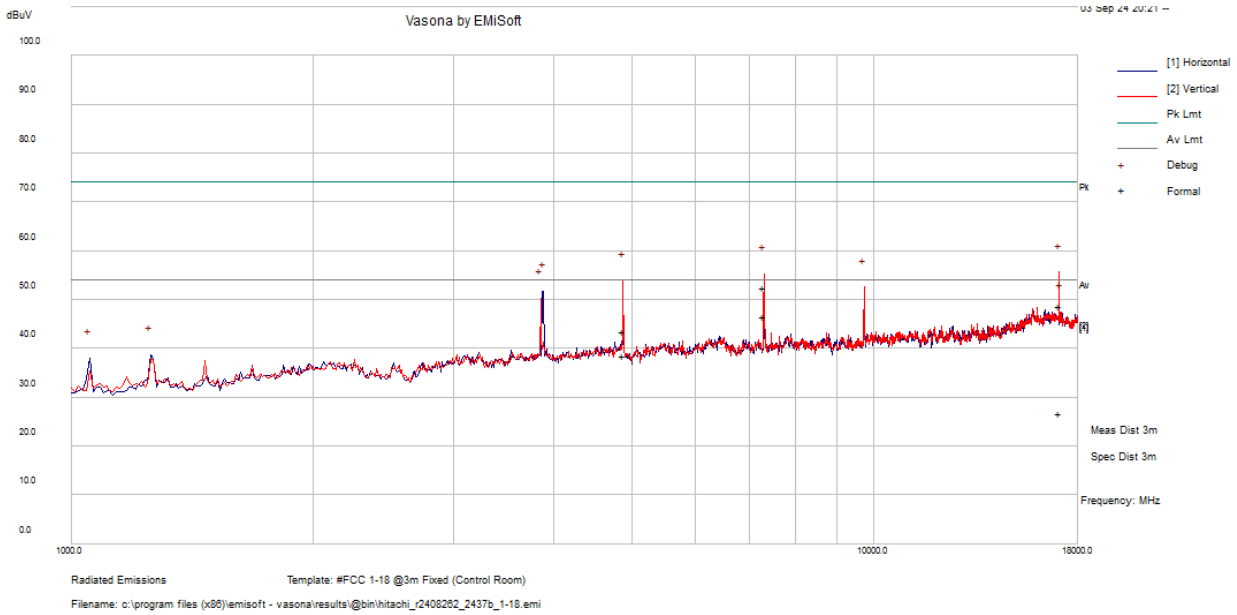
802.11b, Channel 2412 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
4825	56.9	-4.83	52.06	200	V	360	54	-1.94	Peak
1765	59.79	-9.77	50.02	200	H	360	54	-3.98	Peak
7236.875	51.98	-2.92	49.06	100	V	360	54	-4.94	Peak
16640	41.68	6.94	48.62	300	H	360	54	-5.38	Peak
9648.75	48.33	-0.6	47.72	100	V	360	54	-6.28	Peak
3847.5	50.36	-5.7	44.66	300	H	360	54	-9.34	Peak

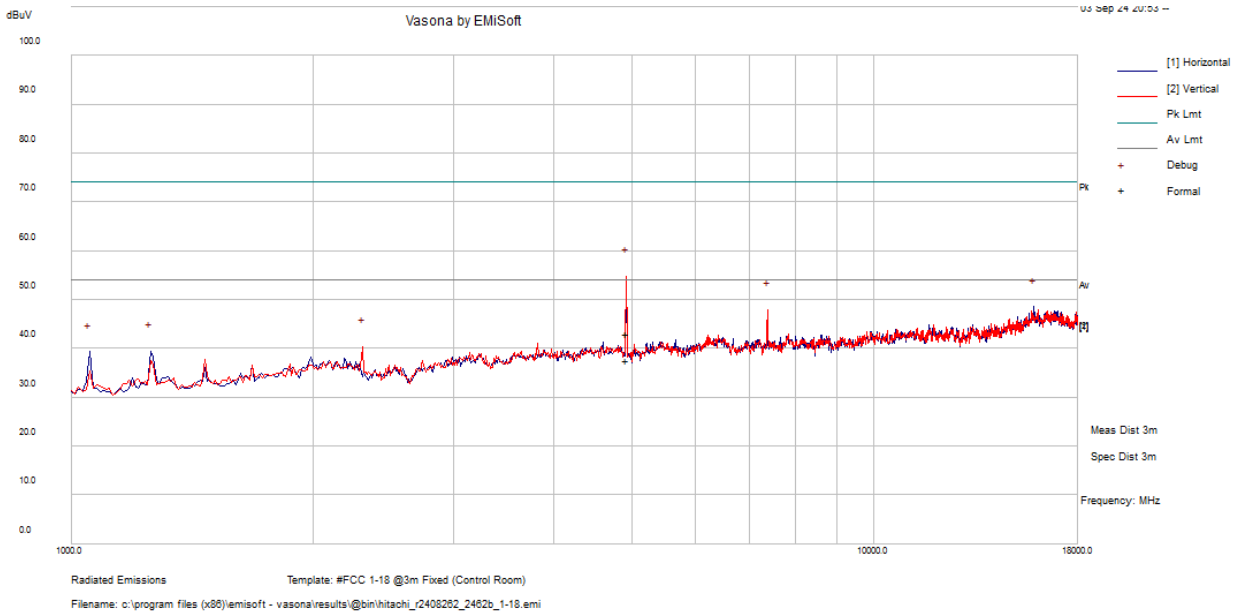
Note: The plot above shows that all peak emissions passed the average limits.

802.11b, Channel 2437 MHz



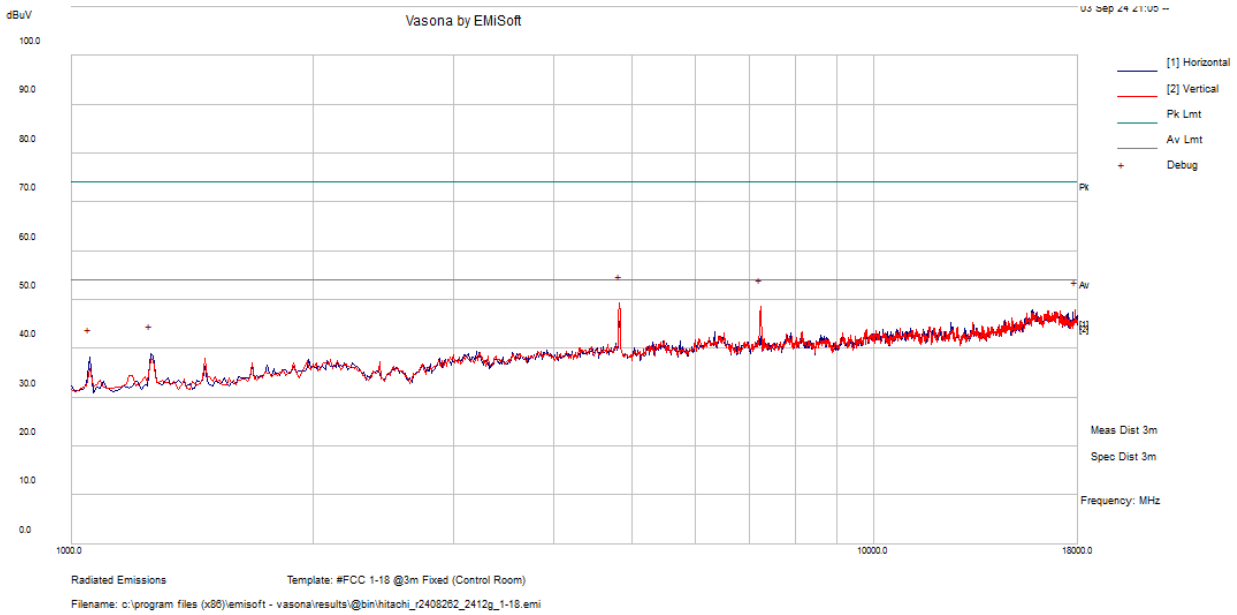
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
17052.69	42.59	6.11	48.69	127	V	149	74	-25.31	Peak
7310.823	55.41	-2.97	52.44	103	V	213	74	-21.56	Peak
4876.985	48.75	-5.34	43.4	148	V	31	74	-30.6	Peak
17052.69	20.53	6.11	26.63	127	V	149	54	-27.37	Average
7310.823	49.52	-2.97	46.56	103	V	213	54	-7.44	Average
4876.985	43.83	-5.34	38.48	148	V	31	54	-15.52	Average

802.11b, Channel 2462 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
4920.963	48.65	-5.63	43.03	173	V	251	74	-30.97	Peak
4920.963	43.22	-5.63	37.6	173	V	251	54	-16.4	Average

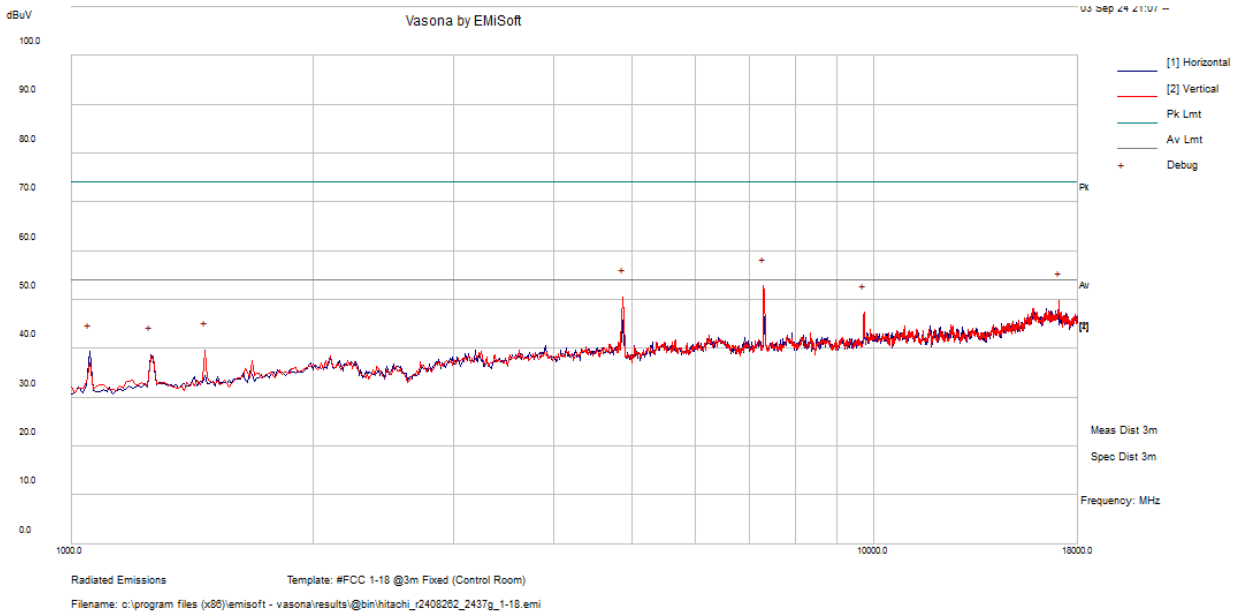
802.11g, Channel 2412 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
4825	54.04	-4.83	49.2	300	V	360	54	-4.8	Peak
7236.875	51.49	-2.92	48.56	100	V	360	54	-5.44	Peak

Note: The plot above shows that all peak emissions passed the average limits.

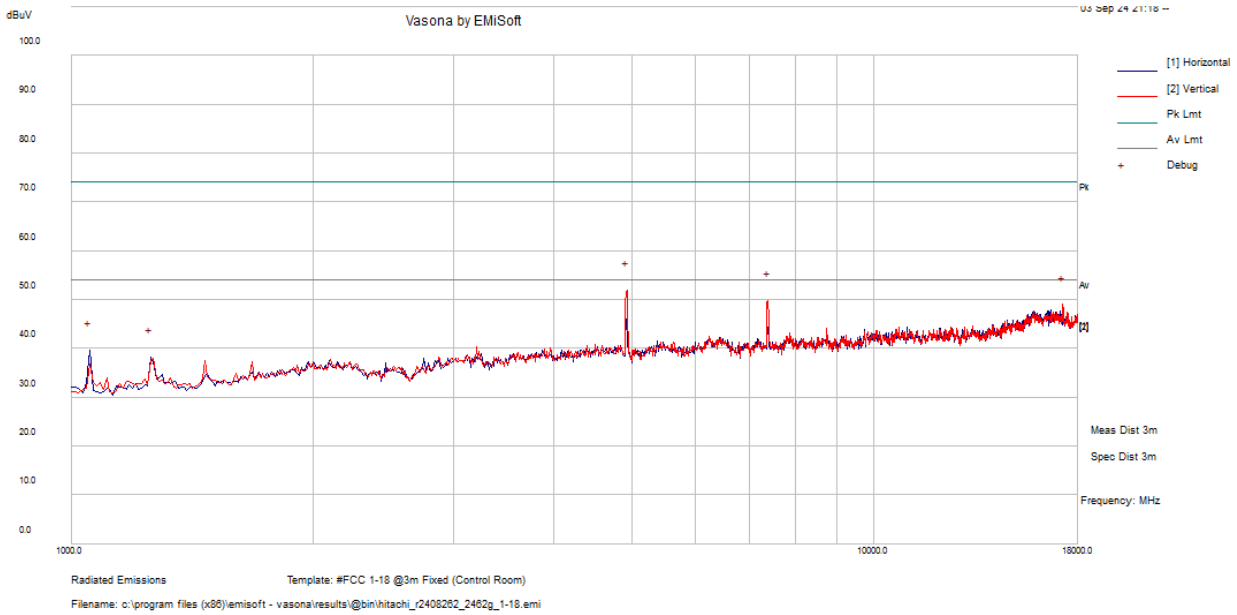
802.11g, Channel 2437 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
7300.625	55.67	-2.93	52.74	100	V	360	54	-1.26	Peak
4878.125	55.95	-5.35	50.59	100	V	360	54	-3.41	Peak
17054.38	43.72	6.1	49.82	100	V	360	54	-4.18	Peak
9744.375	47.44	-0.06	47.38	100	V	360	54	-6.62	Peak
1467.5	51.2	-11.59	39.61	200	V	360	54	-14.39	Peak
1053.125	53.54	-14.26	39.28	300	H	360	54	-14.72	Peak
1255	50.8	-12.09	38.71	300	H	360	54	-15.29	Peak

Note: The plot above shows that all peak emissions passed the average limits.

802.11g, Channel 2462 MHz

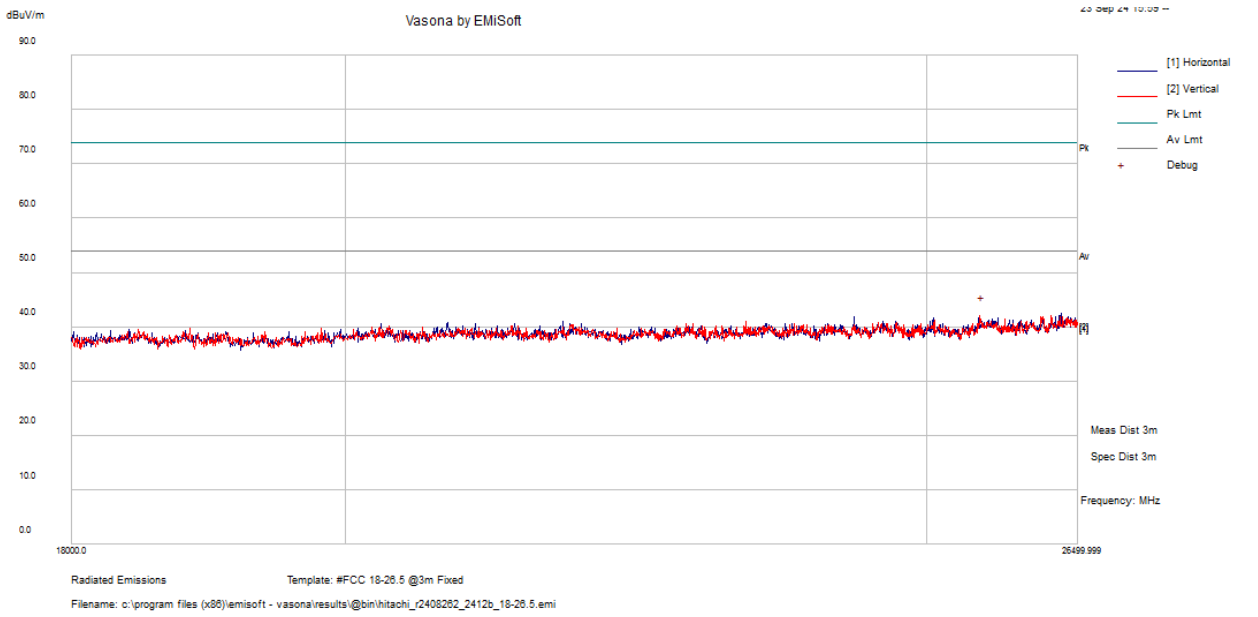


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
4931.25	57.57	-5.63	51.94	300	V	360	54	-2.06	Peak
7385.625	53.1	-3.3	49.79	100	V	360	54	-4.21	Peak
17245.63	43.06	5.96	49.02	100	V	360	54	-4.98	Peak
1053.125	53.9	-14.26	39.63	300	H	360	54	-14.37	Peak
1255	50.31	-12.09	38.23	300	H	360	54	-15.77	Peak

Note: The plot above shows that all peak emissions passed the average limits.

3) 18 GHz – 26.5 GHz, Measured at 3 meter

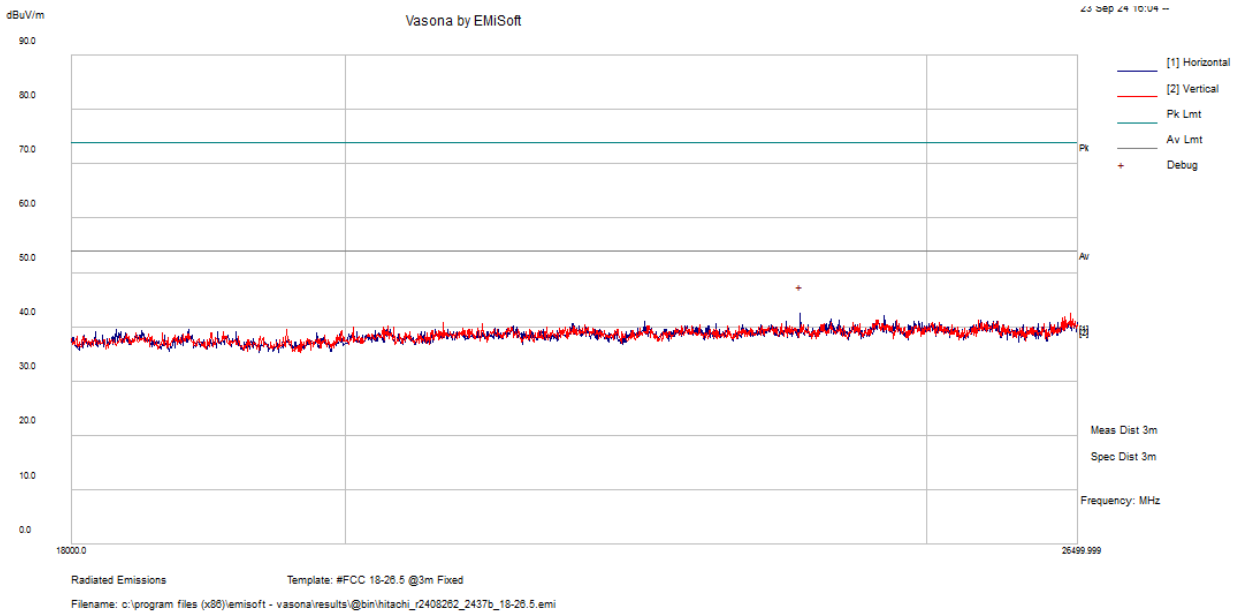
802.11b, Channel 2412 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
25539.03	49.35	-8.95	40.4	200	V	352	54	-13.6	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

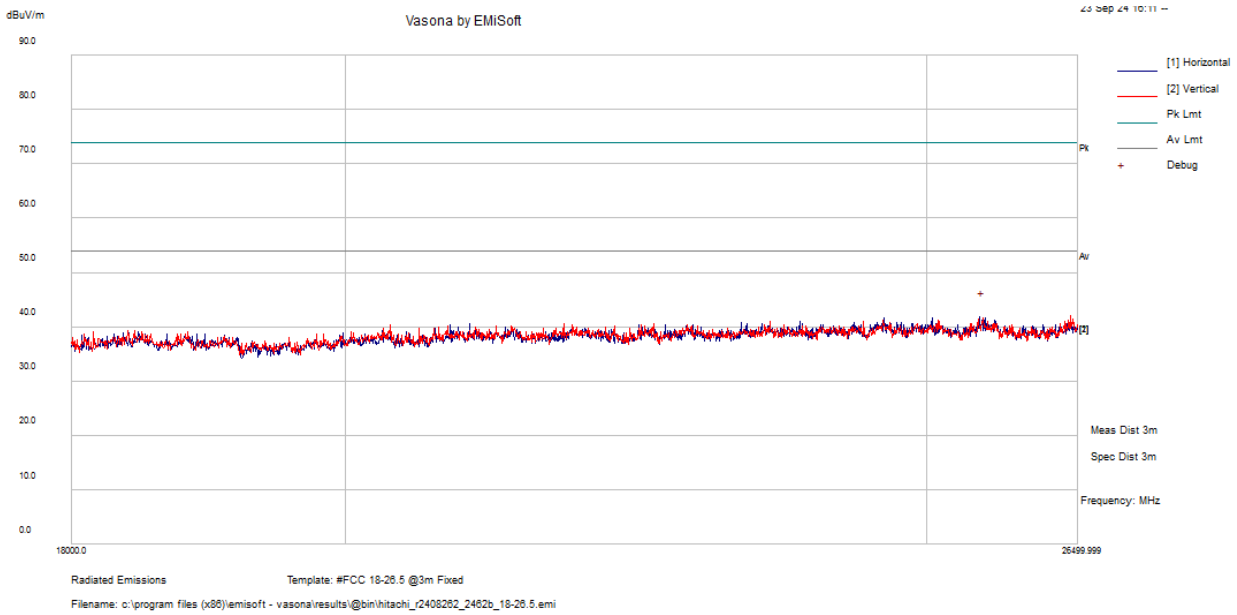
802.11b, Channel 2437 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
23816.9	52.02	-9.73	42.29	200	V	352	54	-11.71	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

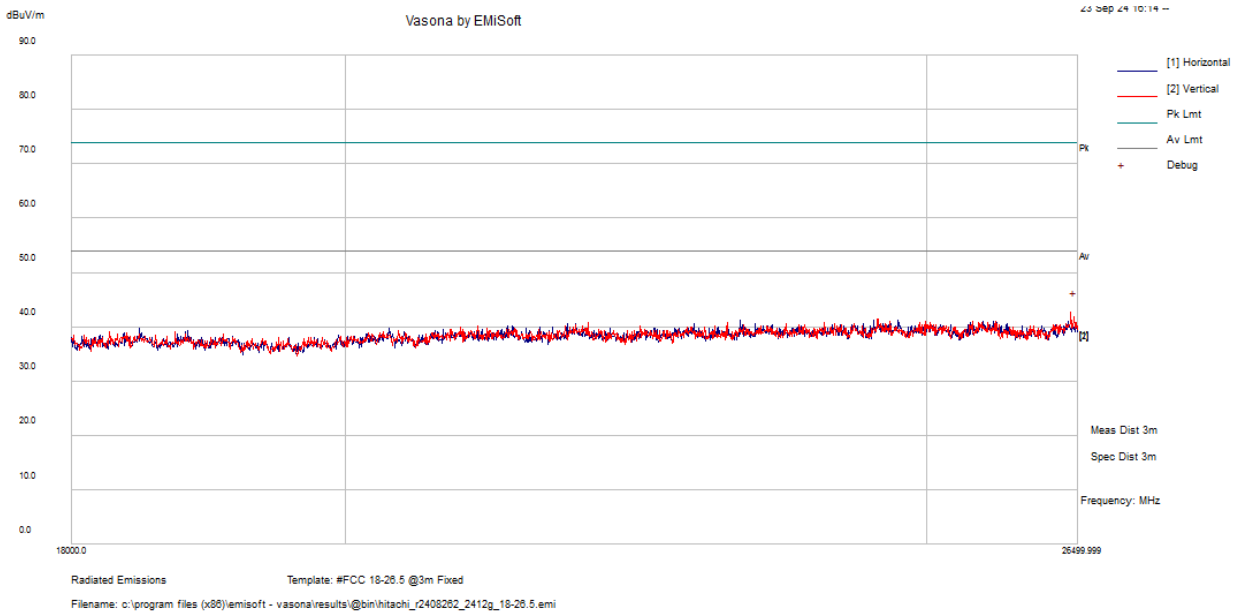
802.11b, Channel 2462 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
25539.03	50.12	-8.95	41.17	200	V	352	54	-12.83	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

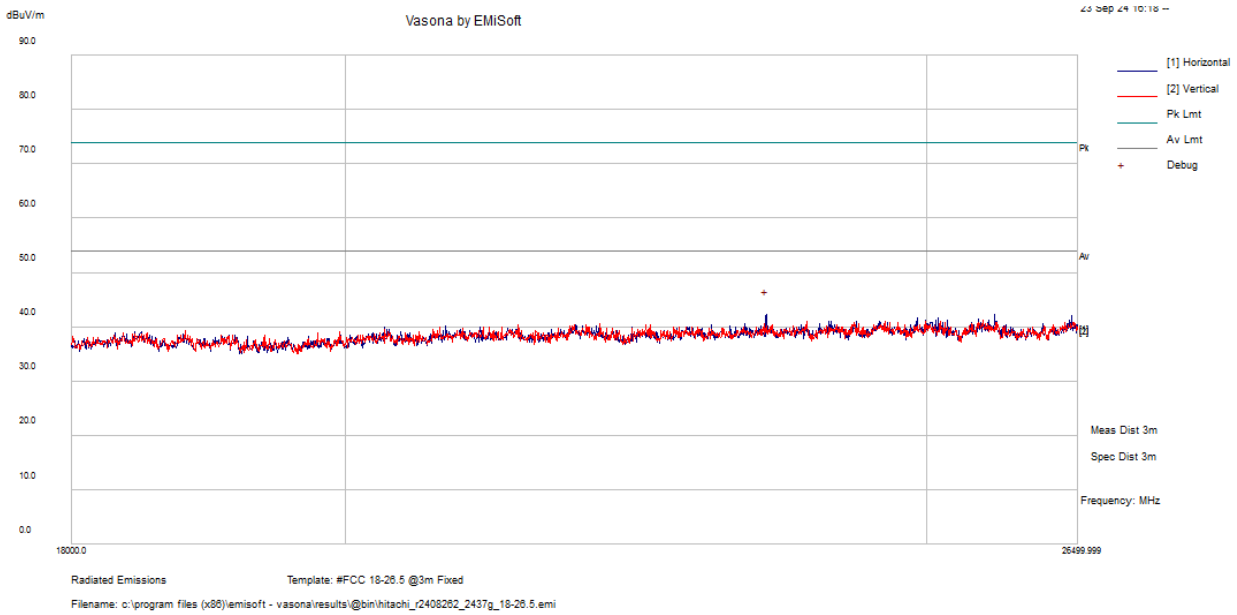
802.11g, Channel 2412 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
26459.03	49.65	-8.3	41.35	199	V	352	54	-12.65	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

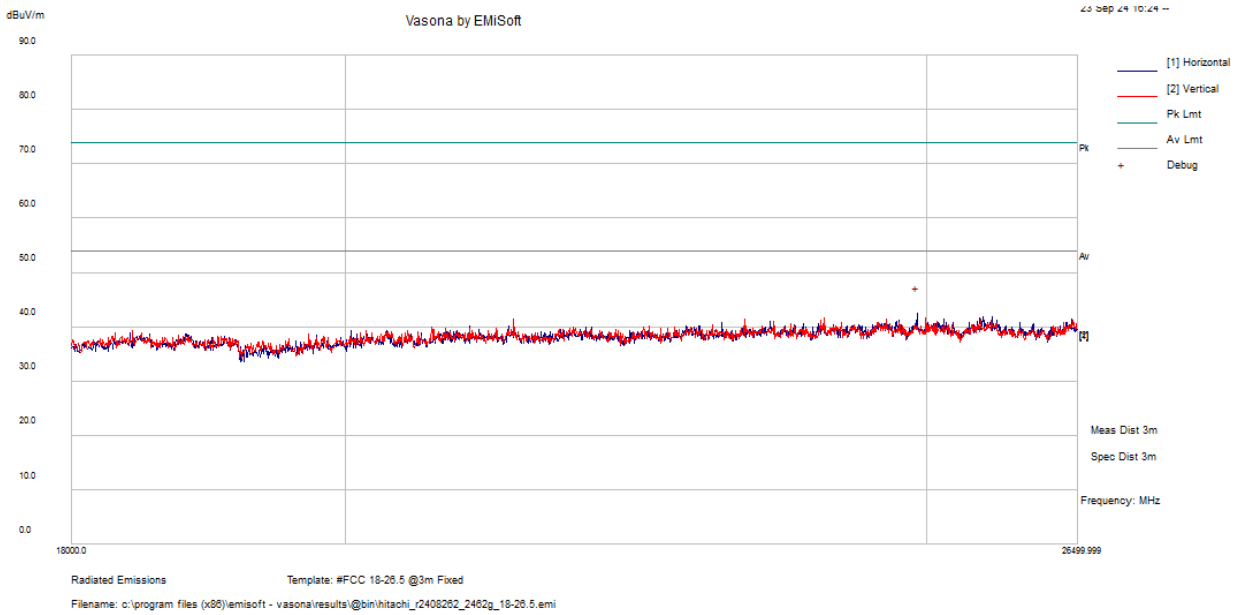
802.11g, Channel 2437 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
23510.3	51	-9.52	41.48	200	V	352	54	-12.52	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

802.11g, Channel 2462 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµ V/m)	Margin (dB)	Detector
24910.87	51.18	-9.1	42.08	200	V	352	54	-11.92	Peak

Note: The plot above shows that all peak emissions passed the average limits.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

8 FCC §15.247(a) (2) & ISEDC RSS-247 §5.2, RSS-Gen §6.7 – Emission Bandwidth

8.1 Applicable Standards

According to FCC §15.247(a) (2) and ISEDC RSS-247 §5.2: the minimum 6 dB bandwidth shall be 500 kHz.

8.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

As per ANSI C63.10 Clause 6.9.3: Occupied bandwidth—power bandwidth (99%) measurement procedure

The occupied bandwidth is the frequency bandwidth such that, below its lower and above its upper frequency limits, the mean powers are each equal to 0.5% of the total mean power of the given emission.

The following procedure shall be used for measuring 99% power bandwidth:

a. The instrument center frequency is set to the nominal EUT channel center frequency. The frequency span for the spectrum analyzer shall be between 1.5 times and 5.0 times the OBW.
b. The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1% to 5% of the OBW, and VBW shall be approximately three times the RBW, unless otherwise specified by the applicable requirement.
c. Set the reference level of the instrument as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than [10 log (OBW/RBW)] below the reference level. Specific guidance is given in 4.1.5.2.
d. Step a) through step c) might require iteration to adjust within the specified range.
e. Video averaging is not permitted. Where practical, a sample detection and single sweep mode shall be used. Otherwise, peak detection and max hold mode (until the trace stabilizes) shall be used.
f. Use the 99% power bandwidth function of the instrument (if available) and report the measured bandwidth.
g. If the instrument does not have a 99% power bandwidth function, then the trace data points are recovered and directly summed in linear power terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached; that frequency is recorded as the lower frequency. The process is repeated until 99.5% of the total is reached; that frequency is recorded as the upper frequency. The 99% power bandwidth is the difference between these two frequencies.
h. The occupied bandwidth shall be reported by providing plot(s) of the measuring instrument display; the plot axes and the scale units per division shall be clearly labeled. Tabular data may be reported in addition to the plot(s).

As per ANSI C63.10 Clause 11.8: DTS bandwidth

One of the following procedures may be used to determine the modulated DTS bandwidth.

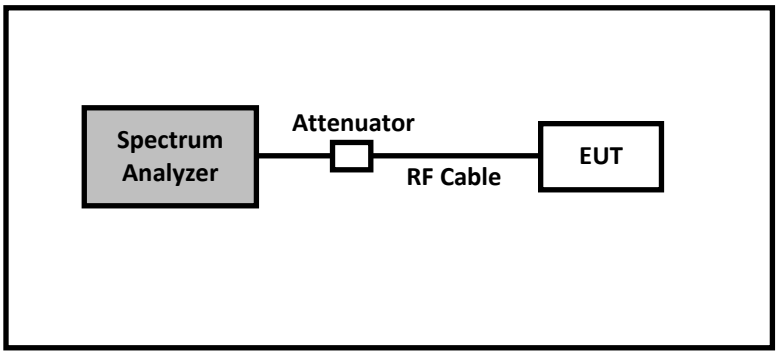
Option 1:

a. Set RBW = 100 kHz.
b. Set the VBW $\geqslant$ [3 $\times$ RBW].
c. Detector = peak.
d. Trace mode = max hold.
e. Sweep = auto couple.
f. Allow the trace to stabilize.
g. Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

Option 2:

The automatic bandwidth measurement capability of an instrument may be employed using the X dB bandwidth mode with X set to 6 dB, if the functionality described in 11.8.1 (i.e., RBW = 100 kHz, VBW $\geqslant$ 3 $\times$ RBW, and peak detector with maximum hold) is implemented by the instrumentation function.
When using this capability, care shall be taken so that the bandwidth measurement is not influenced by any intermediate power nulls in the fundamental emission that might be $\geqslant$6 dB.

8.3 Test Setup Block Diagram



8.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
1506	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
1507	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
-	-	10 dB attenuator	-	-	Each Time[1]	Each Time[1]

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

8.5 Test Environmental Conditions

Temperature:	19.5 - 23 ºC
Relative Humidity:	37 - 45 %
ATM Pressure:	107.2 kPa

The testing was performed by Arturo Reyes from 2024-09-24 to 2024-09-26 and 2024-09-30 to 2024-10-04 at RF test site. The testing for MCS8 was performed by Arturo Reyes on 2024-10-22 at RF test site.

8.6 Test Results

Channel	Frequency (MHz)	99% OBW (MHz)		6 dB OBW (MHz)		6 dB OBW Limit (kHz)	Result
		Port 1	Port 2	Port 1	Port 2		
802.11b							
Low	2412	14.650	13.869	10.108	10.116	≥ 500	Pass
Middle	2437	14.314	15.116	10.171	10.075	≥ 500	Pass
High	2462	14.075	14.115	10.536	10.123	≥ 500	Pass
802.11g							
Low	2412	17.793	18.352	16.388	16.385	≥ 500	Pass
Middle	2437	22.546	27.705	16.436	16.464	≥ 500	Pass
High	2462	17.871	17.401	15.822	16.359	≥ 500	Pass
802.11n20: MCS0							
Low	2412	18.406	18.334	17.585	17.494	≥ 500	Pass
Middle	2437	18.423	18.535	17.415	17.165	≥ 500	Pass
High	2462	18.569	18.192	17.138	16.958	≥ 500	Pass
802.11n40: MCS0							
Low	2422	38.336	37.337	36.581	36.648	≥ 500	Pass
Middle	2437	37.867	38.131	36.570	35.176	≥ 500	Pass
High	2452	37.538	38.008	36.207	36.066	≥ 500	Pass
802.11n20: MCS8							
Low	2412	18.297	18.647	16.387	17.303	≥ 500	Pass
Middle	2437	18.775	22.010	17.675	16.597	≥ 500	Pass
High	2462	18.693	18.470	16.691	17.433	≥ 500	Pass
802.11n40: MCS8							
Low	2422	38.276	37.738	36.527	36.564	≥ 500	Pass
Middle	2437	36.066	37.023	36.427	36.856	≥ 500	Pass
High	2452	36.229	38.248	36.071	35.987	≥ 500	Pass

Please refer to Annex A for detailed Emissions Bandwidth test results.

9 FCC §15.247(b)(3) & ISEDC RSS-247 §5.4 – Maximum Output Power

9.1 Applicable Standards

According to FCC §15.247(b)(3): For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

According to RSS-247 §5.4: For DTS employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

9.2 Measurement Procedure

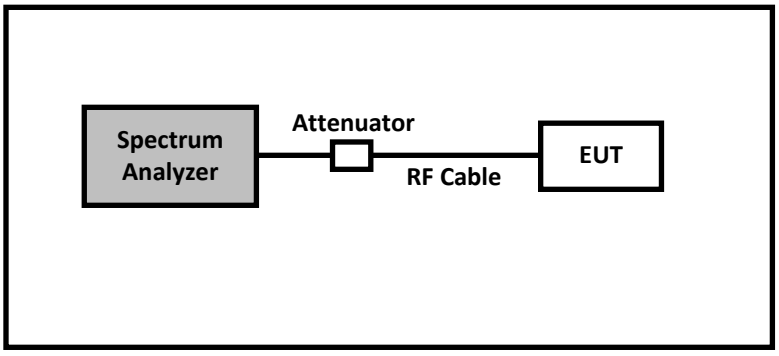
The measurements are based on ANSI C63.10-2013, Section 11.9.2.2.2.

11.9.2.2.2 Method AVGSA-1

Method AVGSA-1 uses trace averaging with the EUT transmitting at full power throughout each sweep. The procedure for this method is as follows:

a. Set span to at least 1.5 times the OBW.
b. Set RBW = 1% to 5% of the OBW, not to exceed 1 MHz.
c. Set VBW $\geqslant$ [3 $\times$ RBW].
d. Number of points in sweep $\geqslant$ [2 $\times$ span / RBW]. (This gives bin-to-bin spacing $\leqslant$ RBW / 2, so that narrowband signals are not lost between frequency bins.)
e. Sweep time = auto.
f. Detector = RMS (i.e., power averaging), if available. Otherwise, use sample detector mode.
g. If transmit duty cycle < 98%, use a sweep trigger with the level set to enable triggering only on full power pulses. The transmitter shall operate at the maximum power control level for the entire duration of every sweep. If the EUT transmits continuously (i.e., with no OFF intervals) or at duty cycle $\geqslant$ 98%, and if each transmission is entirely at the maximum power control level, then the trigger shall be set to "free run."
h. Trace average at least 100 traces in power averaging (rms) mode.
i. Compute power by integrating the spectrum across the OBW of the signal using the instrument's band power measurement function, with band limits set equal to the OBW band edges. If the instrument does not have a band power function, sum the spectrum levels (in power units) at intervals equal to the RBW extending across the entire OBW of the spectrum.

9.3 Test Setup Block Diagram



9.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
1506	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
1507	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
-	-	10 dB attenuator	-	-	Each Time[1]	Each Time[1]

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

9.5 Test Environmental Conditions

Temperature:	19.5 - 23 ºC
Relative Humidity:	37 - 45 %
ATM Pressure:	107.2 kPa

The testing was performed by Arturo Reyes from 2024-09-20 to 2024-09-24 and 2024-09-30 to 2024-10-04 at RF test site. The testing for MCS8 was performed by Arturo Reyes on 2024-10-22 at RF test site.

9.6 Test Results

Channel	Frequency (MHz)	Antenna Gain (dBi)	Conducted Output Power (dBm)			Conducted Output Power Limit (dBm)	EIRP (dBm)			EIRP Limit (dBm)	Result
			Port 1	Port 2	Port 1+2		Port 1	Port 2	Port 1+2		
802.11b											
Low	2412	7.4	26.2	27.1	-	< 28.6	33.6	34.5	-	< 36	Pass
Middle	2437	7.4	27.0	27.6	-	< 28.6	34.4	35.0	-	< 36	Pass
High	2462	7.4	25.1	25.2	-	< 28.6	32.5	32.6	-	< 36	Pass
802.11g											
Low	2412	7.4	23.6	24.3	-	< 28.6	31.0	31.7	-	< 36	Pass
Middle	2437	7.4	27.0	27.0	-	< 28.6	34.4	34.4	-	< 36	Pass
High	2462	7.4	22.4	22.7	-	< 28.6	29.8	30.1	-	< 36	Pass
802.11n20: MCS0											
Low	2412	10.4	21.2	22.3	24.8	< 25.6	31.6	32.7	35.2	< 36	Pass
Middle	2437	10.4	21.8	23.0	25.4	< 25.6	32.2	33.4	35.9	< 36	Pass
High	2462	10.4	19.7	20.6	23.2	< 25.6	30.1	31.0	33.6	< 36	Pass
802.11n40: MCS0											
Low	2422	10.4	18.7	20.3	22.6	< 25.6	29.1	30.7	33.0	< 36	Pass
Middle	2437	10.4	21.9	22.8	25.4	< 25.6	32.3	33.3	35.8	< 36	Pass
High	2452	10.4	17.7	18.4	21.1	< 25.6	28.1	28.8	31.5	< 36	Pass
802.11n20: MCS8											
Low	2412	7.4	21.7	22.4	-	< 28.6	29.1	29.8	-	< 36	Pass
Middle	2437	7.4	25.1	25.5	-	< 28.6	32.5	32.9	-	< 36	Pass
High	2462	7.4	21.2	21.0	-	< 28.6	28.6	28.4	-	< 36	Pass
802.11n40: MCS8											
Low	2422	7.4	19.9	21.0	-	< 28.6	27.3	28.4	-	< 36	Pass
Middle	2437	7.4	25.0	25.2	-	< 28.6	32.4	32.6	-	< 36	Pass
High	2452	7.4	19.3	19.3	-	< 28.6	26.7	26.7	-	< 36	Pass

Note 1: EIRP [dBm] = Conducted Output Power [dBm] + Antenna Gain [dBi].
*Note 2: Conducted Output Power Limit [dBm] = 10*log(Power[mW]/1mW) = 10*log(1000mW/1mW) = 30 dBm*
Note 3: According to FCC 15.247(b)(4), Conducted Output Power Limit [dBm] is reduced by the amount in dB for however much the Antenna Gain [dBi] is over 6 dBi.
*Note 4: EIRP Limit [dBm] = 10*log(Power[mW]/1mW) = 10*log(4000mW/1mW) = 36 dBm*
*Note 5: Port 1+2 [dBm] = 10*log((10^(Port 1 [dBm]/10)) + (10^(Port 2 [dBm]/10)))*
Note 6: Duty Cycle correction factor has already been added to the measurement.

Please refer to Annex B for detailed Maximum Output Power test results.

10 FCC §15.247(e) & ISEDC RSS-247 §5.2(2) – Peak Power Spectral Density

10.1 Applicable Standards

According to ECFR §15.247(e) and RSS-247 §5.2 (2) , for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

10.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8.4: Maximum power spectral density level in the fundamental emission.

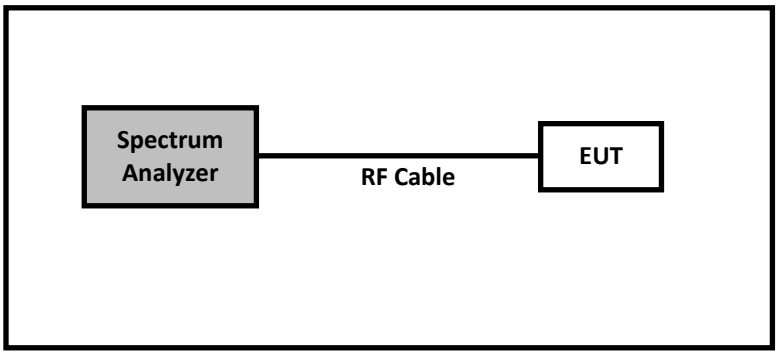
As per ANSI C63.10 Clause 11.10: Maximum power spectral density level in the fundamental emission

Some regulatory requirements specify a conducted PSD limit within the DTS bandwidth during any time interval of continuous transmission.88 Such specifications require that the same method as used to determine the conducted output power shall be used to determine the power spectral density. If maximum peak conducted output power was measured, then the peak PSD procedure 11.10.2 (method PKPSD) shall be used. If maximum conducted output power was measured, then one of the average PSD procedures shall be used, as applicable based on the following criteria (the peak PSD procedure is also an acceptable option):

Method PKPSD (peak PSD): The following procedure shall be used if maximum peak conducted output power was used to determine compliance, and it is optional if the maximum conducted (average) output power was used to determine compliance:

a. Set analyzer center frequency to DTS channel center frequency.
b. Set the span to 1.5 times the DTS bandwidth.
c. Set the RBW to 3 kHz $\leqslant$ RBW $\leqslant$ 100 kHz.
d. Set the VBW $\geqslant$ [3 $\times$ RBW].
e. Detector = peak.
f. Sweep time = auto couple.
g. Trace mode = max hold.
h. Allow trace to fully stabilize.
i. Use the peak marker function to determine the maximum amplitude level within the RBW.
j. If measured value exceeds requirement, then reduce RBW (but no less than 3 kHz) and repeat.

10.3 Test Setup Block Diagram



10.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
1506	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
1507	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
-	-	10 dB attenuator	-	-	Each Time[1]	Each Time[1]

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

10.5 Test Environmental Conditions

Temperature:	19.5 - 23 ºC
Relative Humidity:	37 - 45 %
ATM Pressure:	107.2 kPa

The testing was performed by Arturo Reyes from 2024-09-20 to 2024-09-24 and 2024-09-30 to 2024-10-04 at RF test site. The testing for MCS8 was performed by Arturo Reyes on 2024-10-22 at RF test site.

10.6 Test Results

Channel	Frequency (MHz)	PSD [dBm/3kHz][1]			Limit (dBm/3kHz)	Result
		Port 1	Port 2	Port 1+2		
802.11b						
Low	2412	1.98	3.67	-	< 6.6	Pass
Middle	2437	3.31	4.04	-	< 6.6	Pass
High	2462	0.95	1.89	-	< 6.6	Pass
802.11g						
Low	2412	-1.01	0.23	-	< 6.6	Pass
Middle	2437	1.52	2.32	-	< 6.6	Pass
High	2462	-1.34	-0.61	-	< 6.6	Pass
802.11n20: MCS0						
Low	2412	-3.44	-3.23	-0.32	< 3.6	Pass
Middle	2437	-3.38	-2.61	0.03	< 3.6	Pass
High	2462	-4.48	-4.09	-1.27	< 3.6	Pass
802.11n40: MCS0						
Low	2422	-8.31	-8.50	-5.39	< 3.6	Pass
Middle	2437	-6.95	-4.38	-2.47	< 3.6	Pass
High	2452	-7.07	-6.09	-3.54	< 3.6	Pass
802.11n20: MCS8						
Low	2412	-2.47	-1.81	-	< 6.6	Pass
Middle	2437	0.54	1.11	-	< 6.6	Pass
High	2462	-2.85	-3.19	-	< 6.6	Pass
802.11n40: MCS8						
Low	2422	-7.76	-6.80	-	< 6.6	Pass
Middle	2437	-3.12	-1.77	-	< 6.6	Pass
High	2452	-8.69	-7.74	-	< 6.6	Pass

*Note 1: Port 1+2 [dBm/3kHz] = 10*log((10^(Port 1 [dBm/3kHz]/10)) + (10^(Port 2 [dBm/3kHz]/10)))*
Note 2: According to FCC 15.247(b)(4), PSD Limit [dBm/3kHz] is reduced by the amount in dB by however much the Antenna Gain [dBi] is over 6 dBi.

Please refer to Annex C for detailed Peak Power Spectral Density test results.

11 FCC §15.247(d) & ISEDC RSS-247 §5.5 – 100 kHz Spurious Emissions at Antenna Terminal (dBc)

11.1 Applicable Standards

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum 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. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

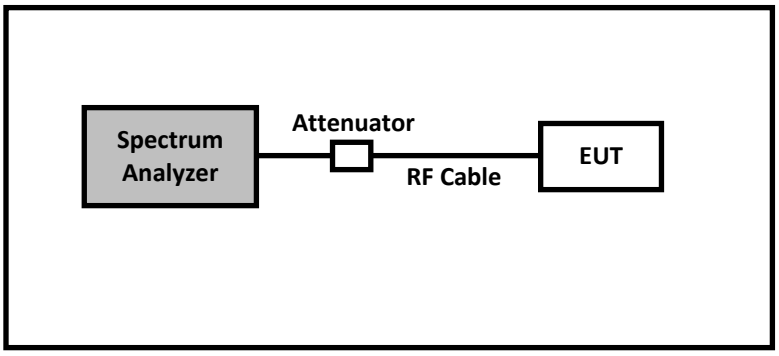
According to ISEDC RSS-247 §5.5.In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

11.2 Measurement Procedure

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation

RBW = 100 kHz
VBW = 300 kHz
Sweep = coupled
Detector function = peak
Trace = max hold

11.3 Test Setup Block Diagram



11.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
1506	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
1507	Mini-Circuits	RF cable, SMA-N , gray, 1.5m	SMA-J/SWA-360/N-J/1.5m	-	Each Time[1]	Each Time[1]
-	-	10 dB attenuator	-	-	Each Time[1]	Each Time[1]

Note[1]: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

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

11.5 Test Environmental Conditions

Temperature:	19.5 - 23 ºC
Relative Humidity:	37 - 45 %
ATM Pressure:	107.2 kPa

The testing was performed by Arturo Reyes from 2024-09-20 to 2024-09-26 and 2024-09-30 to 2024-10-03 at RF test site. The testing for MCS8 was performed by Arturo Reyes on 2024-10-22 at RF test site.

11.6 Test Results

Test Result: Pass

Please refer to Annex D for detailed 100 kHz Spurious Emissions at Antenna Terminal (dBc) test results.

Note: -30dBc was calculated twice, one for spurious emissions and the other for band edge emission.

12 Annex A – Emission Bandwidth

Please refer to the attachment.

13 Annex B – Maximum Output Power

Please refer to the attachment.

14 Annex C – Peak Power Spectral Density

Please refer to the attachment.

15 Annex D – 100 kHz Spurious Emissions at Antenna Terminal (dBc)

Please refer to the attachment.

16 Annex E – FCC §15.209 Conducted Spurious Emissions

Please refer to the attachment.

17 Annex F – FCC §15.209 Band Edges Measurement

Please refer to the attachment.

18 Appendix A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

19 Appendix B (Normative) – EUT External Photographs

Please refer to the attachment

20 Appendix C (Normative) – EUT Internal Photographs

21 Appendix D (Normative) – A2LA Electrical Testing Certificate

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BAY AREA COMPLIANCE LABORATORIES CORP.

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

Presented this 13th day of September 2024.

Mr. Trace McInturff, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2026

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

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

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

--- END OF REPORT ---