FCC CLASS II CHANGE EMI TEST REPORT

of

E.U.T. : Wireless LAN Card

FCC ID. : M4Y-XI-300

MODEL : XI-300

for

APPLICANT : Z-COM, INC.

ADDRESS : 7F-2, NO. 9, PROSEPERITY 1ST RD.,
SCIENCE-BASED INDUSTRIAL PARK,
HSINCHU, TAIWAN, R.O.C.

Test Performed by

ELECTRONICS TESTING CENTER, TAIWAN
NO. 34, LIN 5, DING FU TSUN, LINKOU HSIANG
TAIPEI HSIEN, TAIAWN, R.O.C.

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Report Number : ET90R-11-087

TEST REPORT CERTIFICATION

Applicant : Z-COM, INC.
7F-2, NO. 9, PROSEPERITY 1ST RD., SCIENCE-BASED INDUSTRIAL PARK, HSINCHU, TAIWAN, R.O.C.

Manufacturer : Z-COM, INC.
7F-2, NO. 9, PROSEPERITY 1ST RD., SCIENCE-BASED INDUSTRIAL PARK, HSINCHU, TAIWAN, R.O.C.

Description of EUT :

a) Type of EUT : Wireless LAN Card

b) Trade Name : Z-COM

c) Model No. : XI-300

d) Power Supply : From Notebook PC

e) Antenna Model No. : a) SMA Reverse, RG316; 4cm; MMCX90 (ATOP Technologies, Inc.)
b) SMA Reverse, RG316; 20cm; MMCX90 (ATOP Technologies, Inc.)
c) 2.4GHz Swivel Ant; SMA Reverse (ATOP Technologies, Inc.)

Regulation Applied : FCC Rules and Regulations Part 15 Subpart B & C (1999)

I HEREBY CERTIFY THAT: The data shown in this report were made in accordance with the procedures given in ANSI C63.4, and the energy emitted by the device was founded to be within the limits applicable. I assume full responsibility for accuracy and completeness of these data.

Note: 1. The result of the testing report relate only to the item tested.
2. The testing report shall not be reproduced expect in full, without the written approval of ETC.

Issued Date : Jan. 11, 2002

Test Engineer : Jeff Chuang
(Jeff Chuang)

Approve & Authorized Signer : Will Yauo
Will Yauo, Manager
EMC Dept. II of ELECTRONICS TESTING CENTER, TAIWAN

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1 GENERAL INFORMATION

1.1 Product Description

a) Type of EUT : Wireless LAN Card
b) Trade Name : Z-COM
c) Model No. : XI-300
d) Power Supply : From Notebook PC

1.2 Characteristics of Device

The Wireless LAN Card designed with a transmitting method of direct sequence spread spectrum is for local area network operation, which operates at 2.4 GHz ISM band and data rate up to 11 Mbps. The spread spectrum unit is HFA3861 and the rated output power is 10.8 dBm (12.0 mW).

1.3 Test Methodology

The Wireless LAN Card designed with a transmitting method of direct sequence spread spectrum is for local area network operation, which operates at 2.4 GHz ISM band and data rate up to 11 Mbps. The spread spectrum unit is HFA3861 and the rated output power is 10.8 dBm (12.0 mW).

1.4 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located on the roof top of Building at No. 34, Lin 5, Ding Fu Tsun, Linkou Hsiang, Taipei Hsien, Taiwan 244, R.O.C.
This site has been fully described in a report submitted to your office, and accepted in a letter dated Feb. 10, 2000.

2 PROVISIONS APPLICABLE

2.1 Definition

Unintentional radiator:
A device that intentionally generates and radio frequency energy for use within the device, or that sends radio frequency signals by conduction to associated equipment via connecting wiring, but which is not intended to emit RF energy by radiation or induction.

Class A Digital Device:
A digital device which is marketed for use in commercial or business environment; exclusive of a device which is market for use by the general public, or which is intended to be used in the home.

Class B Digital Device :
A digital device which is marketed for use in a residential environment notwithstanding use in a commercial, business of industrial environment. Example of such devices that are marketed for the general public.

Note : A manufacturer may also qualify a device intended to be marketed in a commercial, business, or industrial environment as a Class B digital device, and in fact is encouraged to do so, provided the device complies with the technical specifications for a Class B Digital Device. In the event that a particular type of device has been found to repeatedly cause harmful interference to radio communications, the Commission may classify such a digital device as a Class B Digital Device, Regardless of its intended use.

Intentional radiator:
A device that intentionally generates and emits radio frequency energy by radiation or induction.

2.2 Requirement for Compliance

(1) Conducted Emission Requirement

For unintentional device, according to §15.107(a) Line Conducted Emission Limits is as following:

Frequency MHz	Emissions μV	Emissions dBμV
0.45 - 30.0	250	48.0

For intentional device, according to §15.207(a) Line Conducted Emission Limits is same as above table.

(2) Radiated Emission Requirement

For unintentional device, according to §15.109(a), except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the following values:

Frequency MHz	Distance Meters	Radiated dBμV/m	Radiated μV/m
30 - 88	3	40.0	100
88 - 216	3	43.5	150
216 - 960	3	46.0	200
Above 960	3	54.0	500

For intentional device, according to §15.209(a), the general requirement of field strength of radiated emissions from intentional radiators at a distance of 3 meters shall not exceed the above table.

(3) Antenna Requirement

For intentional device, according to §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.

(4) Bandwidth Requirement

For direct sequence system, according to 15.247(a)(2), the minimum 6dB bandwidth shall be at least 500 kHz.

(5) Output Power Requirement

For direct sequence system, according to 15.247(b), the maximum peak output power of the transmitter shall not exceed 1 Watt. 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.

(6) 100 kHz Bandwidth of Frequency Band Edges Requirement

According to 15.247(c), if any 100 kHz bandwidth outside these frequency bands, the radio frequency power that is produced by the modulation products of the spreading sequence, the information sequence and the carrier frequency shall be either at least 20 dB below that in any 100 kHz bandwidth within the band that contains the highest level of the desired power or shall not exceed the general levels specified in §15.209(a), whichever results in the lesser attenuation.

(7) Power Density Requirement

According to 15.247(d), for direct sequence systems, the transmitted power density averaged over any 1 second interval shall not be greater than 8 dBm in any 3 kHz bandwidth within these bands.

(8) Processing Gain Requirement

According to 15.247(e), the processing gain of a direct sequence system shall be at least 10 dB. The processing gain shall be determined from the ratio in dB of the signal to noise ratio with the system spreading code turned off to the signal to noise ratio with the system spreading code turned on, as measured at the demodulated output of the receiver.

2.3 Restricted Bands of Operation

Only spurious emissions are permitted in any of the frequency bands listed below :

MHz	MHz	MHz	GHz
0.090 - 0.110	16.42-16.423	399.9-410	4.5-5.25
0.495 - 0.505 **	16.69475 - 16.69525	608-614	5.35-5.46
2.1735 - 2.1905	16.80425 - 16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475 - 156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2655-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3360-4400	Above 38.6
13.36-13.41			

** : Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz

2.4 Labeling Requirement

The device shall bear the following statement in a conspicuous location on the device :

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

2.5 User Information

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

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

The Federal Communications Commission Radio Frequency Interference Statement includes the following paragraph.

This equipment has been tested and found to comply with the limits for a Class B Digital Device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation.

This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instruction may cause harmful interference to radio communication. However, there is no guarantee that interference will not occur in a particular installation.

If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

-- Reorient or relocate the receiving antenna.

-- Increase the separation between the equipment and receiver.

-- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.

-- Consult the dealer or an experienced radio / TV technician for help.

3. SYSTEM TEST CONFIGURATION

3.1 Justification

For this device is changing the antenna used only, after making some assessments the test items need to be re-investigated are radiated emissions. Therefore the test data provided for applying Class II Permissive Change is radiated emissions only. And we also found the test result was sure to fullfill the requirement of Class II Permissive Change.

For radiated emissions below 1 GHz, the system was configured for testing in a typical fashion as a customer would normally use it. The peripherals other than EUT were connected in normally standing by situation. Measurement was performed under the condition that a computer program was exercised to simulate data communication of EUT, and the transmission rate was set to maximum allowed by EUT. Three highest emissions were verified with varying placement of the transmitting antenna connected to EUT to maximize the emission from EUT.

During the preliminary test, the worse case is the antenna with a cable, and data presented in this test report just shows the worse case.

3.2 Devices for Tested System

Device	Manufacture	Model	Cable Description
Wireless LAN Card *	Z-COM, INC.	XI-300	----
Note Book Computer	Twinhead	P79T	2.5m Unshielded AC Adaptor Poewr Cord

Remark "*" means equipment under test.

4 RADIATED EMISSION MEASUREMENT

4.1 Applicable Standard

For unintentional radiator, the radiated emission shall comply with §15.109(a).

For intentional radiators, according to §15.247 (a), operation under this provision is limited to frequency hopping and direct sequence spread spectrum, and the out band emission shall be comply with §15.247 (c)

4.2 Measurement Procedure

1. Setup the configuration per figure 5 and 6 for frequencies measured below and above 1 GHz respectively.

2. For emission frequencies measured below 1 GHz, a pre-scan is performed in a shielded chamber to determine the accurate frequencies of higher emissions will be checked on a open test site. As the same purpose, for emission frequencies measured above 1 GHz, a pre-scan also be performed with a 1 meter measuring distance before final test.

3. For emission frequencies measured below and above 1 GHz, set the spectrum analyzer on a 100 kHz and 1 MHz resolution bandwidth respectively for each frequency measured in step 2.

4. The search antenna is to be raised and lowered over a range from 1 to 4 meters in horizontally polarized orientation. Position the highness when the highest value is indicated on spectrum analyzer, then change the orientation of EUT on test table over a range from 0° to 360° with a speed as slow as possible, and keep the azimuth that highest emission is indicated on the spectrum analyzer. Vary the antenna position again and record the highest value as a final reading. A RF test receiver is also used to confirm emissions measured.

   Note : A band pass filter was used to avoid pre-amplifier saturated when measure TX operation mode in frequency band above 1 GHz.

5. Repeat step 4 until all frequencies need to be measured were complete.

6. Repeat step 5 with search antenna in vertical polarized orientations.

7. Check the three frequencies of highest emission with varying the placement of cables associated with EUT to obtain the worse case and record the result.

Figure 1 : Frequencies measured below 1 GHz configuration

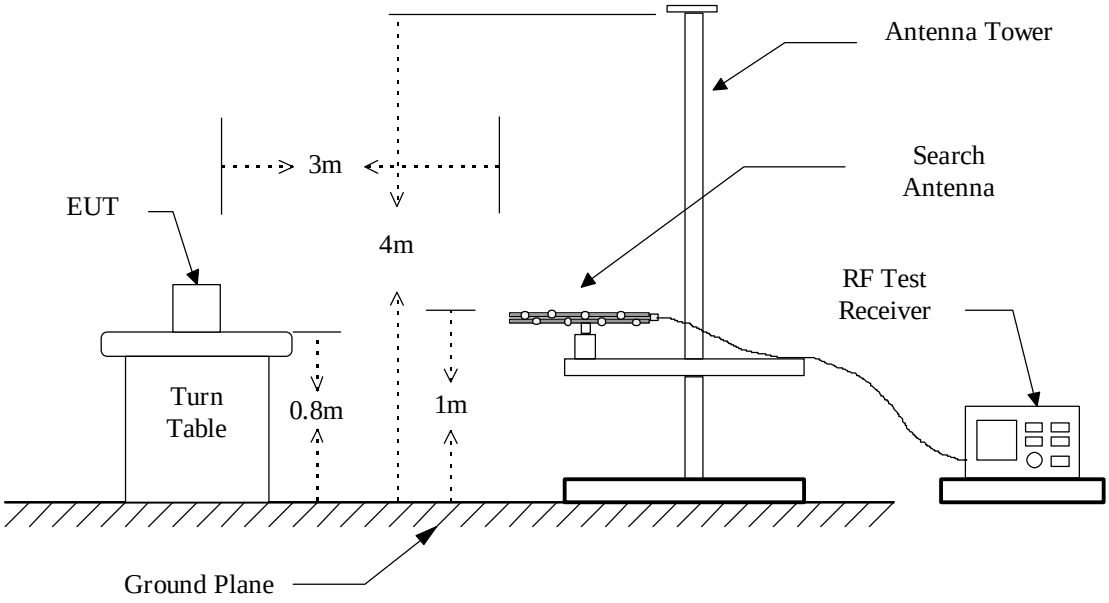
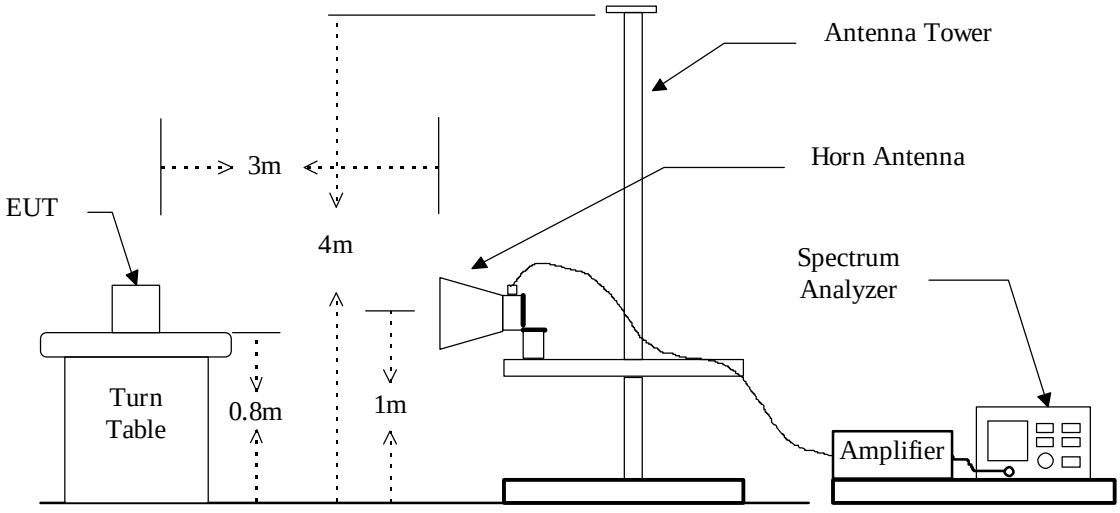


Figure 2 : Frequencies measured above 1 GHz configuration



4.3 Measuring Instrument

The following instrument are used for radiated emissions measurement:

Equipment	Manufacturer	Model No.	Next Cal. Due
Spectrum Analyzer	Hewlett-Packard	8568B	12/21/2002
Pre-selector	Hewlett-Packard	85685A	01/01/2003
Quasi Peak Detector	Hewlett-Packard	85650A	01/01/2003
Spectrum Analyzer	Adventest	R3271	09/09/2002
RF Test Receiver	Rohde & Schwarz	ESVS 30	08/05/2002
Horn Antenna	EMCO	3115	05/14/2002
Log periodic Antenna	EMCO	3146	11/02/2002
Biconical Antenna	EMCO	3110B	11/02/2002
Preamplifier	Hewlett-Packard	8449B	05/10/2002
Preamplifier	Hewlett-Packard	8447D	04/09/2002
Spectrum Analyzer	Hewlett-Packard	8564E	04/22/2002

Measuring instrument setup in measured frequency band when specified detector function is used :

Frequency Band (MHz)	Instrument	Function	Resolution bandwidth	Video Bandwidth
30 to 1000	RF Test Receiver	Quasi-Peak	120 kHz	N/A
	Spectrum Analyzer	Peak	100 kHz	100 kHz
Above 1000	Spectrum Analyzer	Peak	1 MHz	1 MHz
	Spectrum Analyzer	Average	1 MHz	300 Hz

4.4 Radiated Emission Data

4.4.1 RF Portion

a) Channel 1

Operation Mode : Receiving /Transmitting

Fundamental Frequency : 2412 MHz (Local Frequency : 2038 MHz)

Test Date : Nov. 29, 2001 Temperature : 25 ℃ Humidity : 60 %

Frequency	Reading (dBuV)				Factor	Result @3m (dBuV/m)		Limit @3m (dBuV/m)		Margin	Table Deg.	Ant. High
	H		V		(dB)	Peak	Ave	Peak	Ave.	(dB)	(Deg.)	(m)
(MHz)	Peak	Ave	Peak	Ave	Corr.							
*2037.720	52.7	50.6	57.1	54.3	-4.5	52.6	49.8	74.0	54.0	-4.2	110	1.00
*4075.440	44.8	***	43.2	***	2.0	46.8	***	74.0	54.0	-7.2	110	1.00
*6113.160	---	---	---	---	4.5	---	---	74.0	54.0	---	---	---
*8150.880	---	---	---	---	6.5	---	---	74.0	54.0	---	---	---
*10188.600	---	---	---	---	7.6	---	---	74.0	54.0	---	---	---
4824.000	---	---	---	---	2.6	---	---	74.0	54.0	---	---	---
7236.000	---	---	---	---	5.8	---	---	74.0	54.0	---	---	---
9648.000	---	---	---	---	7.3	---	---	74.0	54.0	---	---	---
12060.000	---	---	---	---	9.2	---	---	74.0	54.0	---	---	---
14472.000	---	---	---	---	11.6	---	---	74.0	54.0	---	---	---
16884.000	---	---	---	---	12.1	---	---	74.0	54.0	---	---	---
19296.000	---	---	---	---	8.8	---	---	74.0	54.0	---	---	---
21708.000	---	---	---	---	9.8	---	---	74.0	54.0	---	---	---
24120.000	---	---	---	---	10.4	---	---	74.0	54.0	---	---	---

Note :

1. Item of margin shown in above table refer to average limit.
2. It is considered that the results of average comply with average limit when measuring data with a peak function detector meet the average limit. Mark "***" means that Peak result is meet average limit.
3. Remark "---" means that the emissions level is too low to be measured.
4. Item "Margin" referred to Average limit while there is only peak result.
5. The expanded uncertainty of the radiated emission tests is 3.53 dB.

b) Channel 6

Operation Mode : Receiving / Transmitting

Fundamental Frequency : 2437 MHz (Local Frequency : 2063 MHz)

Test Date : Nov. 29, 2001 Temperature : 25 ℃ Humidity : 60 %

Frequency (MHz)	Reading (dBuV) H Peak	H Ave	V Peak	V Ave	Factor (dB) Corr.	Result @3m (dBuV/m) Peak	Result @3m (dBuV/m) Ave	Limit @3m (dBuV/m) Peak	Limit @3m (dBuV/m) Ave.	Margin (dB)	Table Deg. (Deg.)	Ant. High (m)
*2062.770	51.6	48.7	53.0	51.3	-4.4	48.6	46.9	74.0	54.0	-7.1	100	1.00
*4125.540	43.8	***	44.1	***	2.0	46.1	***	74.0	54.0	-7.9	100	1.00
*6188.310	---	---	---	---	4.5	---	---	74.0	54.0	---	---	---
*8251.080	---	---	---	---	6.6	---	---	74.0	54.0	---	---	---
*10313.850	---	---	---	---	7.7	---	---	74.0	54.0	---	---	---
4874.000	---	---	---	---	2.7	---	---	74.0	54.0	---	---	---
7311.000	---	---	---	---	5.9	---	---	74.0	54.0	---	---	---
9748.000	---	---	---	---	7.3	---	---	74.0	54.0	---	---	---
12185.000	---	---	---	---	9.3	---	---	74.0	54.0	---	---	---
14622.000	---	---	---	---	11.6	---	---	74.0	54.0	---	---	---
17059.000	---	---	---	---	13.1	---	---	74.0	54.0	---	---	---
19496.000	---	---	---	---	8.5	---	---	74.0	54.0	---	---	---
21933.000	---	---	---	---	9.9	---	---	74.0	54.0	---	---	---
24370.000	---	---	---	---	10.7	---	---	74.0	54.0	---	---	---

Note :

1. Item of margin shown in above table refer to average limit.
2. It is considered that the results of average comply with average limit when measuring data with a peak function detector meet the average limit. Mark "***" means that Peak result is meet average limit.
3. Remark "---" means that the emissions level is too low to be measured.
4. Item "Margin" referred to Average limit while there is only peak result.
5. The expanded uncertainty of the radiated emission tests is 3.53 dB.

c) Channel 11

Operation Mode : Receiving / Transmitting

Fundamental Frequency : 2462 MHz (Local Frequency : 2088 MHz)

Test Date : Nov. 29, 2001 Temperature : 25 ℃ Humidity : 60 %

Frequency (MHz)	Reading (dBuV) H Peak	H Ave	V Peak	V Ave	Factor (dB) Corr.	Result @3m (dBuV/m) Peak	Result @3m (dBuV/m) Ave	Limit @3m (dBuV/m) Peak	Limit @3m (dBuV/m) Ave.	Margin (dB)	Table Deg. (Deg.)	Ant. High (m)
*2087.750	49.5	47.3	53.0	51.1	-4.3	48.7	46.8	74.0	54.0	-7.2	90	1.10
*4175.500	45.7	---	46.3	---	2.0	48.3	---	74.0	54.0	-5.7	90	1.10
*6263.250	---	---	---	---	4.5	---	---	74.0	54.0	---	---	---
*8351.000	---	---	---	---	6.7	---	---	74.0	54.0	---	---	---
*10438.750	---	---	---	---	7.8	---	---	74.0	54.0	---	---	---
4924.000	---	---	---	---	2.8	---	---	74.0	54.0	---	---	---
7386.000	---	---	---	---	6.0	---	---	74.0	54.0	---	---	---
9848.000	---	---	---	---	7.3	---	---	74.0	54.0	---	---	---
12310.000	---	---	---	---	9.3	---	---	74.0	54.0	---	---	---
14772.000	---	---	---	---	11.5	---	---	74.0	54.0	---	---	---
17234.000	---	---	---	---	14.3	---	---	74.0	54.0	---	---	---
19696.000	---	---	---	---	8.5	---	---	74.0	54.0	---	---	---
22158.000	---	---	---	---	10.0	---	---	74.0	54.0	---	---	---
24620.000	---	---	---	---	10.9	---	---	74.0	54.0	---	---	---

Note :

1. Item of margin shown in above table refer to average limit.
2. It is considered that the results of average comply with average limit when measuring data with a peak function detector meet the average limit. Mark "***" means that Peak result is meet average limit.
3. Remark "---" means that the emissions level is too low to be measured.
4. Item "Margin" referred to Average limit while there is only peak result.
5. The expanded uncertainty of the radiated emission tests is 3.53 dB.

4.4.2 Other Emission

a) Emission frequencies below 1 GHz

Test Date : Feb. 09, 2002 Temperature : 15 ℃ Humidity : 69 %

Frequency (MHz)	Ant-Pol H/V	Meter Reading (dBuV)	Corrected Factor (dB)	Result @3m (dBuV/m)	Limit @3m (dBuV/m)	Margin (dB)	Table Degree (Deg.)	Ant. High (m)
80.792	V	47.7	-14.9	32.8	40.0	-7.2	180	1.00
133.415	H	46.1	-11.3	34.8	43.5	-8.7	90	1.80
192.023	H	44.3	-8.1	36.2	43.5	-7.3	215	4.00
200.048	H	45.2	-7.1	38.1	43.5	-5.4	45	3.00
233.620	H	40.8	-4.9	35.9	46.0	-10.1	360	3.80
334.085	H	47.5	-8.1	39.4	46.0	-6.6	279	3.00
467.120	V	43.1	-4.8	38.3	46.0	-7.7	180	1.50

Note :

1. Remark "---" means that the emissions level is too low to be measured.

2. The expanded uncertainty of the radiated emission tests is 3.53 dB.

3. Emissions show on above table are from Notebook other than from the EUT itself, for these frequencies are not the working frequency of EUT.

b) Emission frequencies above 1 GHz

Radiated emission frequencies above 1 GHz to 5 GHz were too low to be measured with a pre-amplifier of 35 dB.

4.5 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor, High Pass Filter Loss(if used) and Cable Loss, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation calculation is as follows:

Result = Reading + Corrected Factor

where

Corrected Factor = Antenna FACTOR + Cable Loss + High Pass Filter Loss - Amplifier Gain