





FCC PART 15, SUBPART C
ISED C RSS-247, ISSUE 2, FEBRUARY 2017
TEST REPORT

For

Cisco Systems Inc.

125 W Tasman Drive,
San Jose, CA 95134, USA

FCC ID: LDK948342197
IC: 2461N-948342197

Report Type: CIIPC Report	Product Type: Cisco Catalyst 9130AXE Series Wi-Fi 6 Access Points
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Report Number: R2104052-247	
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* 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 "***"

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2104052-247	Original Report	2021-08-03

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report was prepared on behalf of *Cisco Systems Inc.*, and their product model: *C9130AXE-B (US)*, *C9130AXE-A (Canada)*, FCC ID: LDK948342197, IC: 2461N-948342197 with Marlin Antenna Model: C-ANT9104 as referred to as EUT in this report. The product is an 802.11ax Access Point operates in 2.4 GHz and 5 GHz bands.

1.2 Mechanical Description of EUT

Length (cm)	Width (cm)	Height (cm)	Weight (kg)
40	59	46	8.48

S/N: ACE21060026, assigned by Cisco System, Inc.

1.3 Objective

This report was prepared on behalf of *Cisco Systems Inc.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission's rules, ISED RSS-247 Issue 2 on February 2017.

The objective was to determine continuous compliance with FCC Part 15.247, ISED RSS-247 rules for Radiated Spurious Emissions.

1.4 Related Submittal(s)/Grant(s)

Equipment Class: NII, FCC ID: LDK948342197, IC: 2461N-948342197

1.5 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 v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.6 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 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 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.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 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):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o 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:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o 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 v04.

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

2.2 EUT Exercise Software

The test firmware used was Tera Term and test commands, provided by *Cisco Systems Inc.*, the software is compliant with the standard requirements being tested against.

Radio	Modulation	Frequency (MHz)	Power Setting
2.4 GHz Wi-Fi	802.11b	2437	17
2.4 GHz Aux	802.11g	2437	17
BLE	GFSK	2440	5

Data Rates Tested:

802.11b mode: 1Mbps

802.11g mode: 6Mbps

BLE: Default

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v04 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

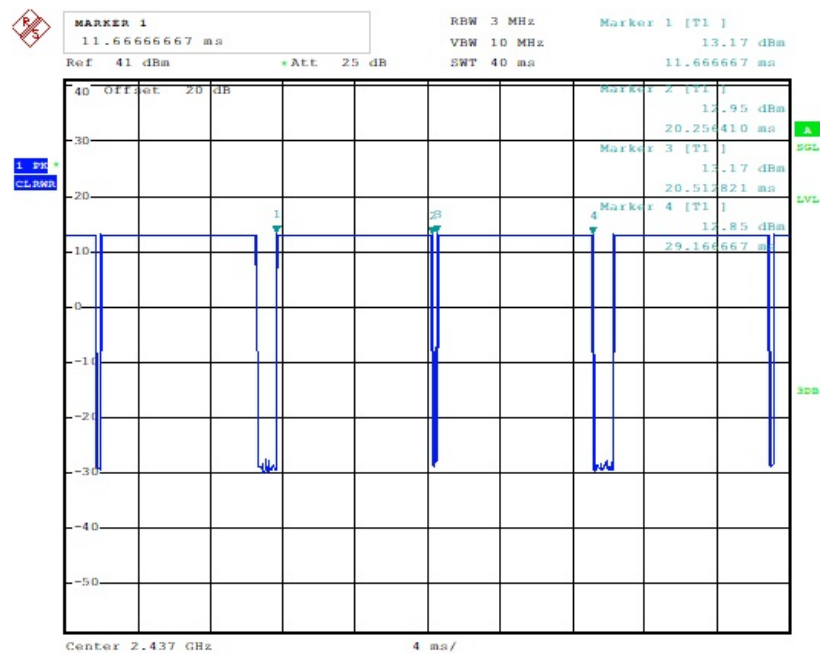
Radio	Radio Mode	Total On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
2.4 GHz Wi-Fi	802.11b	17.243589	18.647435	92.47%	0.34
BLE	GFSK	-	-	100	0
2.4 GHz Aux	802.11g	0.29487	0.310897	94.84%	0.23

Duty Cycle = On Time (ms)/ Period (ms)

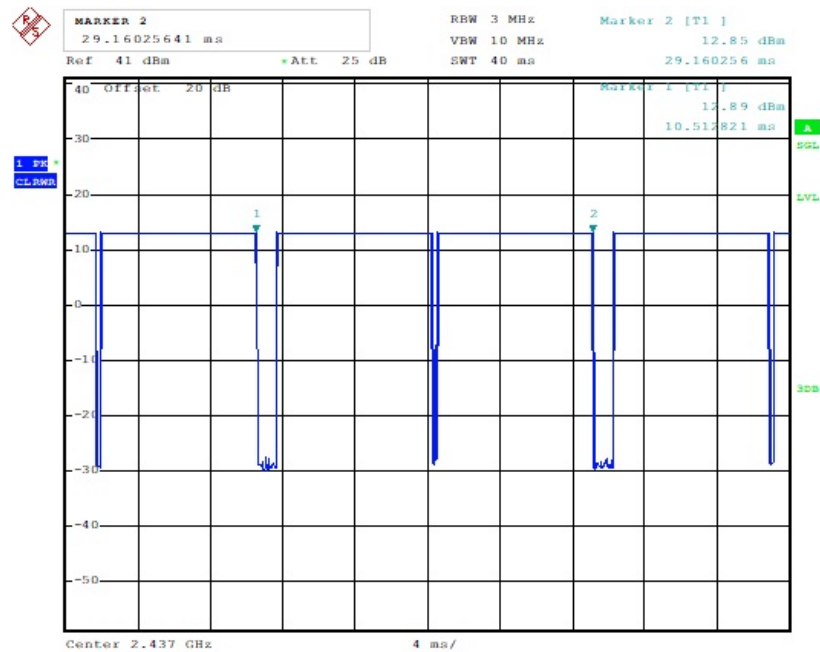
Duty Cycle Correction Factor (dB) = $10 \cdot \log(1/\text{Duty Cycle})$

Please refer to the following plots.

Duty Cycle
2.4 GHz 802.11b mode

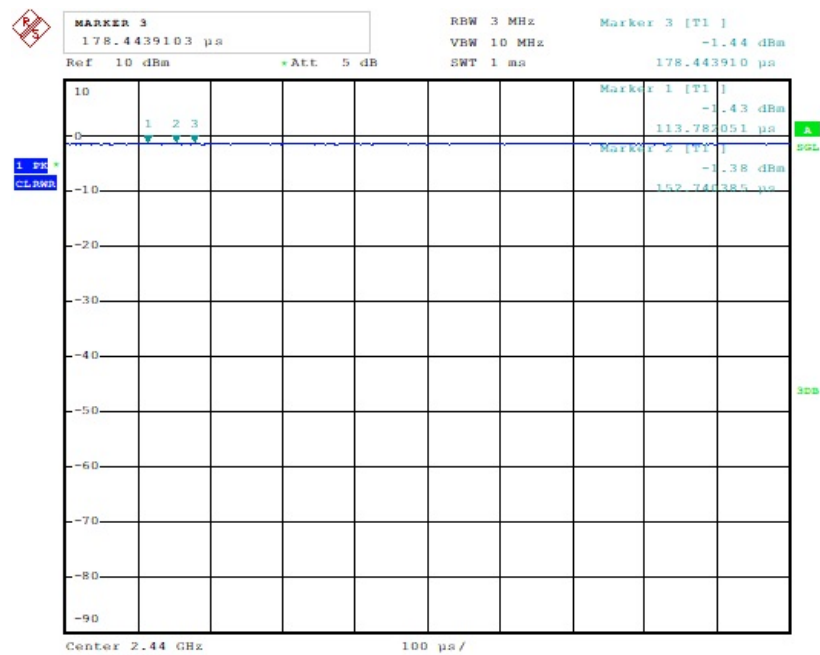


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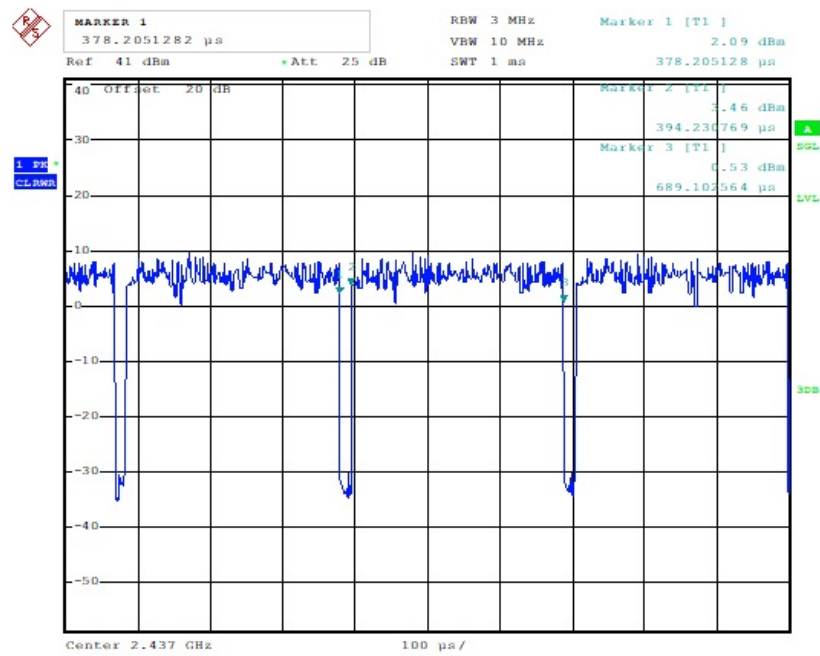
Date: 21.MAY.2021 15:43:38

BLE



Date: 21.MAY.2021 16:53:59

2.4 GHz AUX 802.11g mode



Date: 21.MAY.2021 15:50:51

2.4 Equipment Modifications

No equipment modifications are made to the EUT

2.5 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6410	3CKRAQ1

2.6 Remote Support Equipment

Manufacturer	Description	Model
Cisco	Power supply	AIR-PWRINJ6 V01

2.7 Interface Ports and Cabling

Cable Description	Length	To	From
Ethernet cable	2 m	PoE	EUT
Ethernet-serial-USB cable	2 m	EUT	Laptop

3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISED Rules	Description of Test	Results
FCC §15.207 ISED RSS-Gen §8.8	AC Power Line Conducted Emissions	Compliant
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247 (d) ISED RSS-247 §5.5 ISED RSS-Gen §8.9 and §8.10	Radiated Spurious Emissions	Compliant

4 FCC §15.207 & ISEDC RSS-Gen §8.8 - AC Power Line Conducted Emissions

4.1 Applicable Standards

As per FCC §15.207, ISEDC RSS GEN §8.

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 μ H/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

4.2 Test Setup

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

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.

4.3 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.

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

All data was 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".

4.4 Corrected Amplitude and Margin Calculation

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

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

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

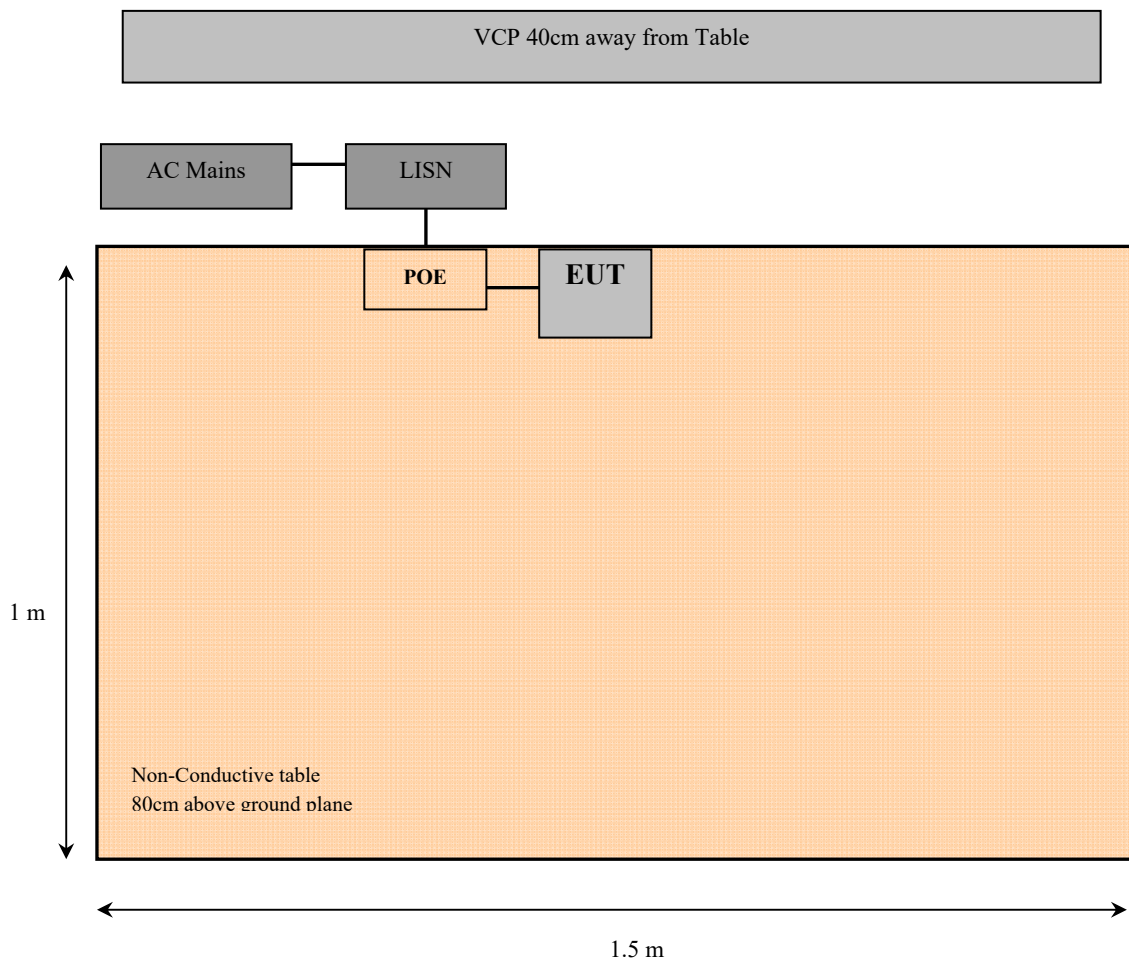
The Correction Factor is calculated by adding the Cable Loss (CL) and the Attenuator Factor (Atten) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = \text{CL} + \text{Atten}$$

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

4.5 Test Setup Block Diagram



4.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz..	EMI Test Receiver	ESCI 1166.5950K03	100337	2021-03-09	2 years
Rohde & Schwarz..	Impulse Limiter	ESH3-Z2	101964	2020-07-01	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150203	2021-03-02	1 year
Fairview Microwave	Coaxial Cable	LMR240UF	BACL1907181	2020-08-25	1 year
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2020-10-13	1 year
California Instruments	AC Power Source	5001ix-208	57079	N/A	N/A

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".

4.7 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	101.31 kPa

The testing was performed by Deepak Mishra on 2021-06-02

4.8 Summary of Test Results

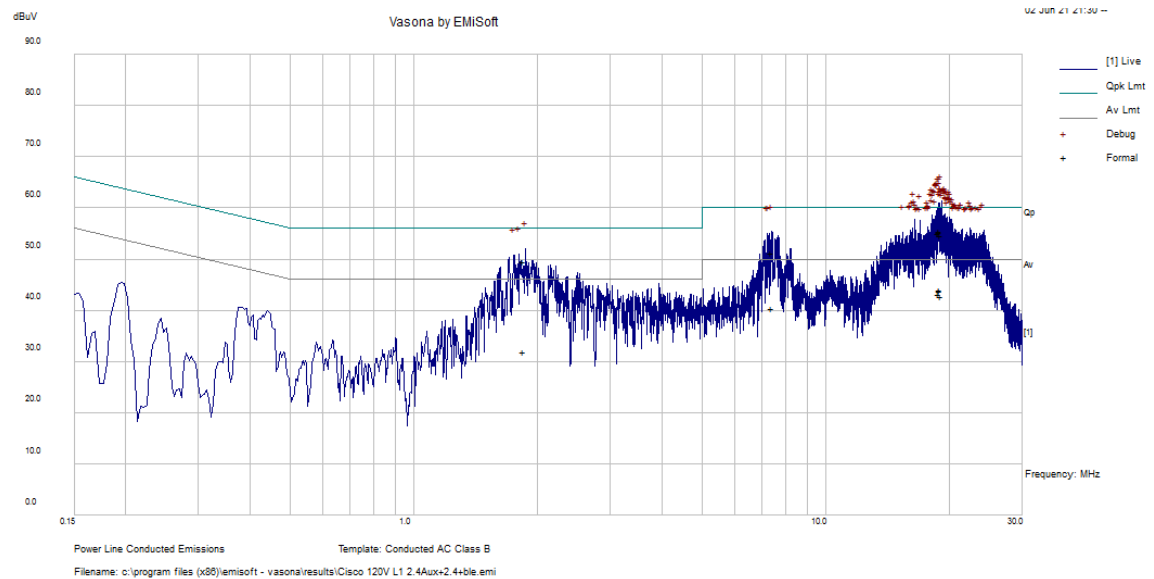
According to the recorded data in following table, the EUT complied with the FCC Part 15 and RSS-Gen standards’ conducted emissions limits, with the margin reading of:

Connection: POE connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Live/Neutral)	Range (MHz)
-4.48	18.93775	Line	0.15-30

4.9 Conducted Emissions Test Plots and Data

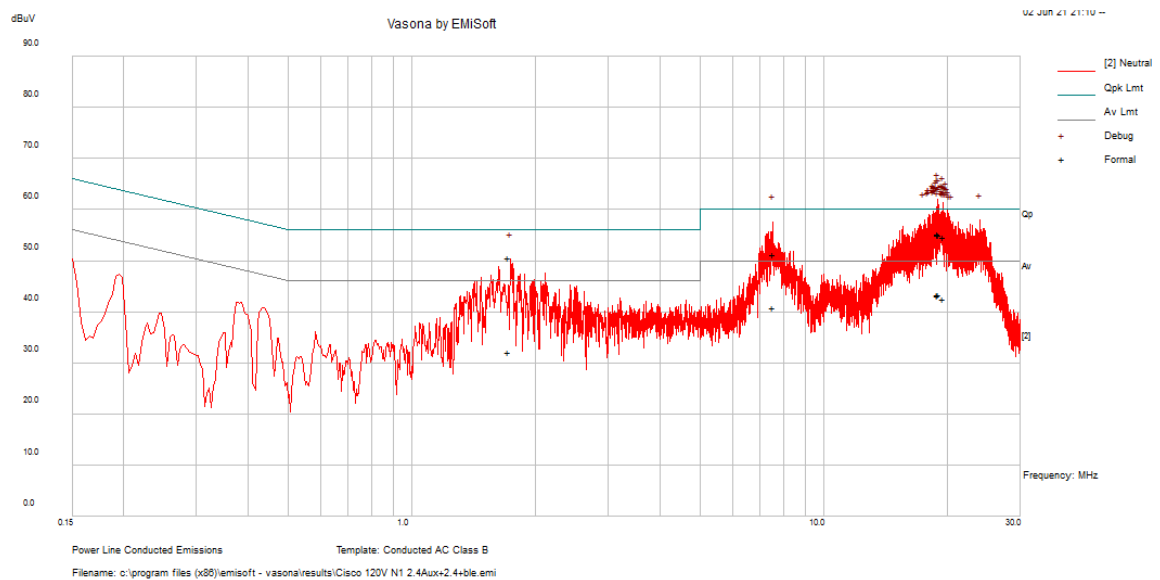
Radio Configuration: 2.4 GHz Wi-Fi b mode 2437 MHz with 2.4G AUX g mode 2437MHz and BLE 2440 MHz

120 V, 60 Hz – Line



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
19.09482	44.04	10.55	54.59	Line	60	-5.41	QP
18.93775	44.97	10.54	55.52	Line	60	-4.48	QP
18.83491	44.5	10.54	55.04	Line	60	-4.96	QP
18.93139	44.64	10.54	55.19	Line	60	-4.81	QP
1.84984	39.61	10.02	49.63	Line	56	-6.37	QP
7.399431	41.16	10.03	51.19	Line	60	-8.81	QP

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
19.09482	32.22	10.55	42.77	Line	50	-7.23	Ave.
18.93775	33.19	10.54	43.74	Line	50	-6.26	Ave.
18.83491	32.7	10.54	43.25	Line	50	-6.75	Ave.
18.93139	33.55	10.54	44.09	Line	50	-5.91	Ave.
1.84984	21.83	10.02	31.85	Line	46	-14.15	Ave.
7.399431	30.42	10.03	40.45	Line	50	-9.55	Ave.

120 V, 60 Hz – Neutral

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
18.9194	44.59	10.54	55.13	Neutral	60	-4.87	QP
19.50177	44.03	10.57	54.6	Neutral	60	-5.4	QP
19.02392	44.58	10.55	55.13	Neutral	60	-4.87	QP
18.91515	44.73	10.54	55.28	Neutral	60	-4.72	QP
7.527997	41.12	10.03	51.16	Neutral	60	-8.84	QP
1.722566	40.52	10.01	50.54	Neutral	56	-5.46	QP

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/ Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
18.9194	32.81	10.54	43.36	Neutral	50	-6.64	Ave.
19.50177	32.02	10.57	42.59	Neutral	50	-7.41	Ave.
19.02392	32.77	10.55	43.32	Neutral	50	-6.68	Ave.
18.91515	32.68	10.54	43.22	Neutral	50	-6.78	Ave.
7.527997	30.82	10.03	40.85	Neutral	50	-9.15	Ave.
1.722566	22.02	10.01	32.04	Neutral	46	-13.96	Ave.

5 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

5.1 Applicable Standards

As per FCC §15.35(d): 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	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

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 ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength ($\mu\text{V}/\text{m}$ at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

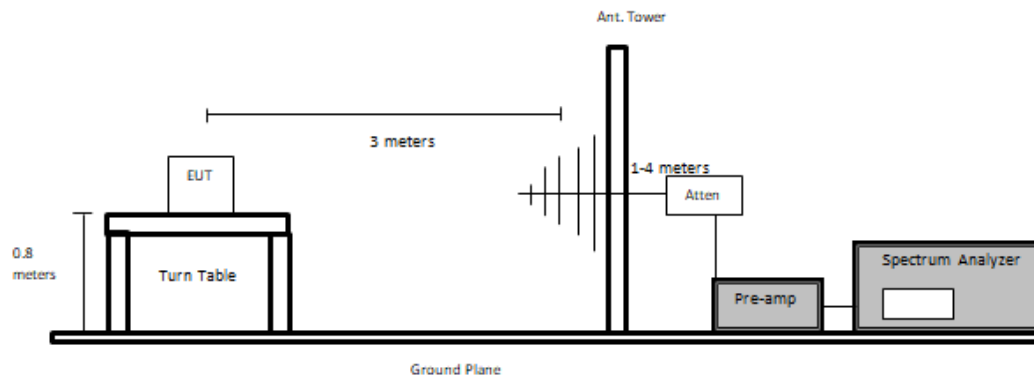
5.2 Test Setup

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 Subpart C limits.

The spacing between the peripherals was 10 centimeters.

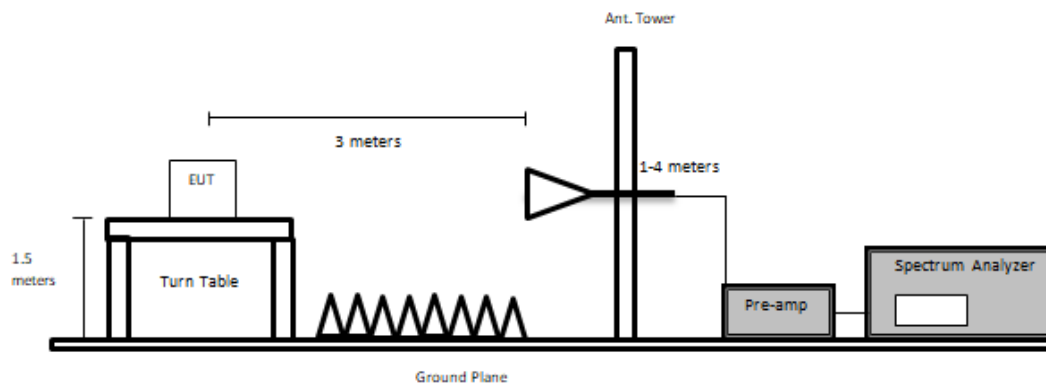
External I/O cables were draped along the edge of the test table and bundle when necessary.

Below 1GHz:

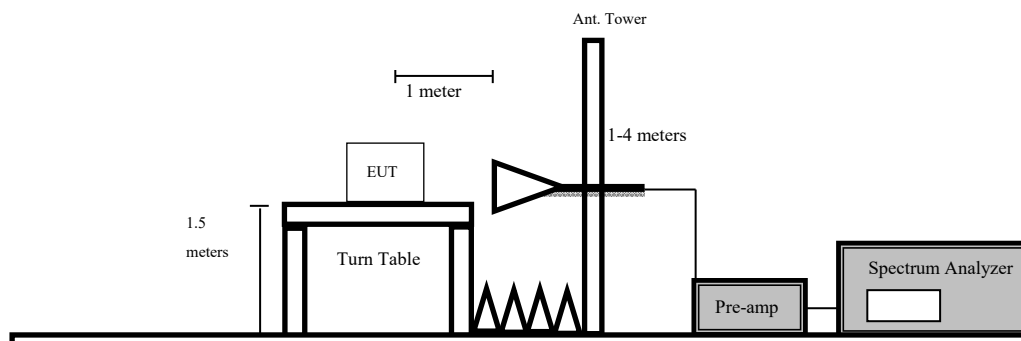


Above 1GHz:

At 3 meters:



At 1 meter:



5.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

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 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter 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:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

(1) Peak: $\text{RBW} = 1\text{MHz} / \text{VBW} = 1\text{MHz} / \text{Sweep} = \text{Auto}$

(2) Average: $\text{RBW} = 1\text{MHz} / \text{VBW} = 10\text{Hz or } 1/\text{T} / \text{Sweep} = \text{Auto}$

5.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz and for above 1GHz scans.

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

$$\text{CA} = \text{S.A. Reading} + \text{Correction Factor}$$

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:

$$\text{Correction Factor} = \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

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:

$$\text{CA} = \text{Ai} + \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

5.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950.03	100338	2020-03-17	1.5 years
Rhode & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100044	2021-05-14	2 years
ETS Lindgren	Horn Antenna	3117	00218973	2019-02-13	2.5 years
Insulated Wire Corp.	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN- 3960-KPS	DC 1917	2021-03-03	1 year
Agilent	Analyzer, Spectrum	E4446A	MY48250238	2021-02-12	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Biconilog Antenna	JB3	A020106-2	2019-11-20	2 years
Wisewave	Antenna, Horn	ARH-4223-02	10555-01	2021-04-12	2 years
Agilent	Amplifier, Pre	8447D	2944A07030	2020-08-17	1 year
MDP Digital	Times Microwave LMR 400 UltraFex Coaxial Cable 35'	LMR400UF	BACL1904161	2020-5-20	1.5 years
-	SMA cable	-	C00011	Each time ¹	N/A
-	N-Type Cable	-	C00012	Each time ¹	N/A
-	N-Type Cable	-	C00014	Each time ¹	N/A
Agilent	Pre-Amplifier	8449B	3147A00400	2021-03-02	1 year
Agilent	Analyzer, Spectrum	E4446A	US44300386	2021-04-27	1 year
BACL	5m3 Sensitivity Box	1	2	2020-10-27	1 year
IW Microwave	157 Series 2.92 SM (x2) Armored 20 ft. Cable	KPS-1571AN- 2400	DC 1922	2020-06-06	1 year
A.H. Systems	Pre-Amplifier	PAM 1840V	170	2020-11-09	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and attenuator included in the test set-up will be 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”.

5.6 Test Environmental Conditions

Temperature:	22-25 °C
Relative Humidity:	29-30 %
ATM Pressure:	102.1 kPa

The testing was performed by Deepak Mishra 2021-05-24 to 2021-06-02 in 5m chamber 3.

5.7 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and RSS-247 standard's radiated emissions limits, and had the worst margin of:

2.4 GHz Wi-Fi b mode 2437 MHz with 2.4G AUX g mode 2437 MHz and BLE 2440 MHz

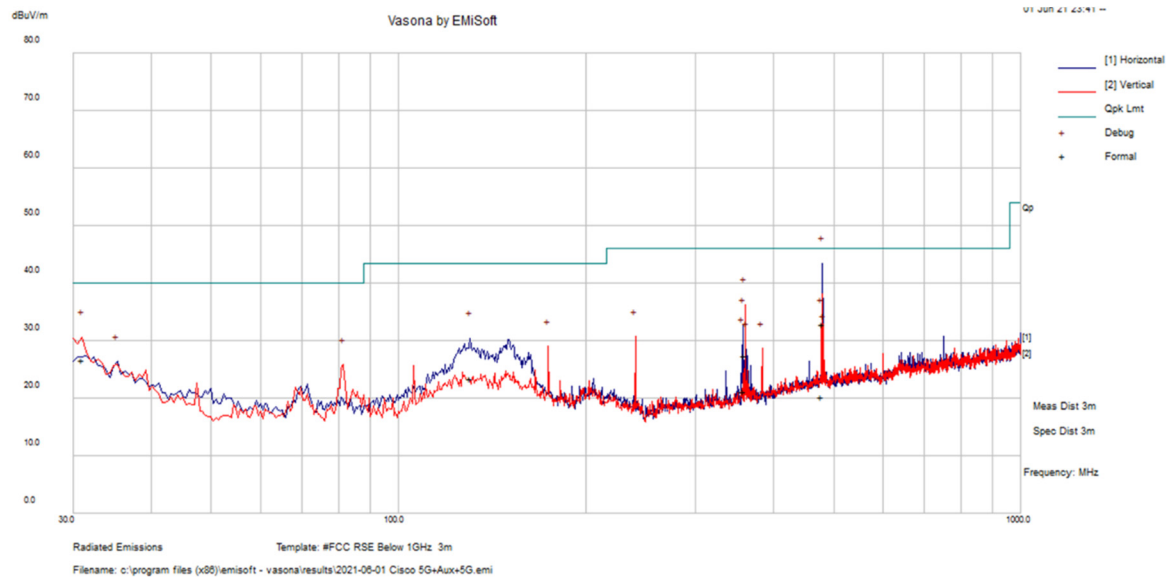
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, channel
-4.61	4852	Vertical	2440 Middle Channel

Please refer to the following table and plots for test result details

5.8 Spurious Emissions Test Results

Worst Case Colocation, 2.4 GHz Wi-Fi (802.11b, 2437 MHz) + 2.4 GHz Aux (802.11g, 2437 MHz) + BLE (2442 MHz)

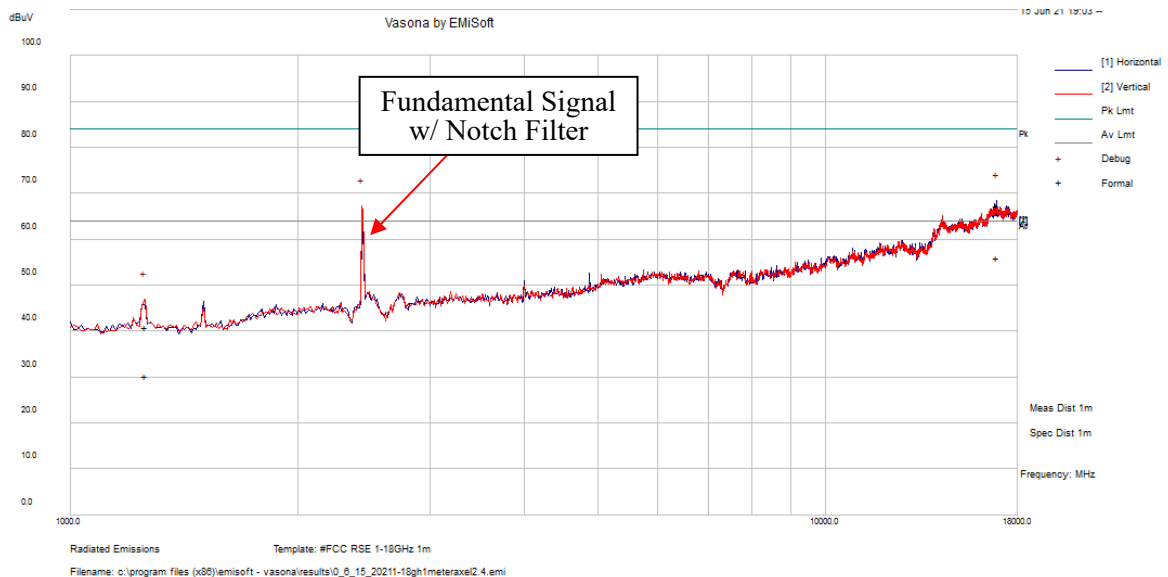
1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters



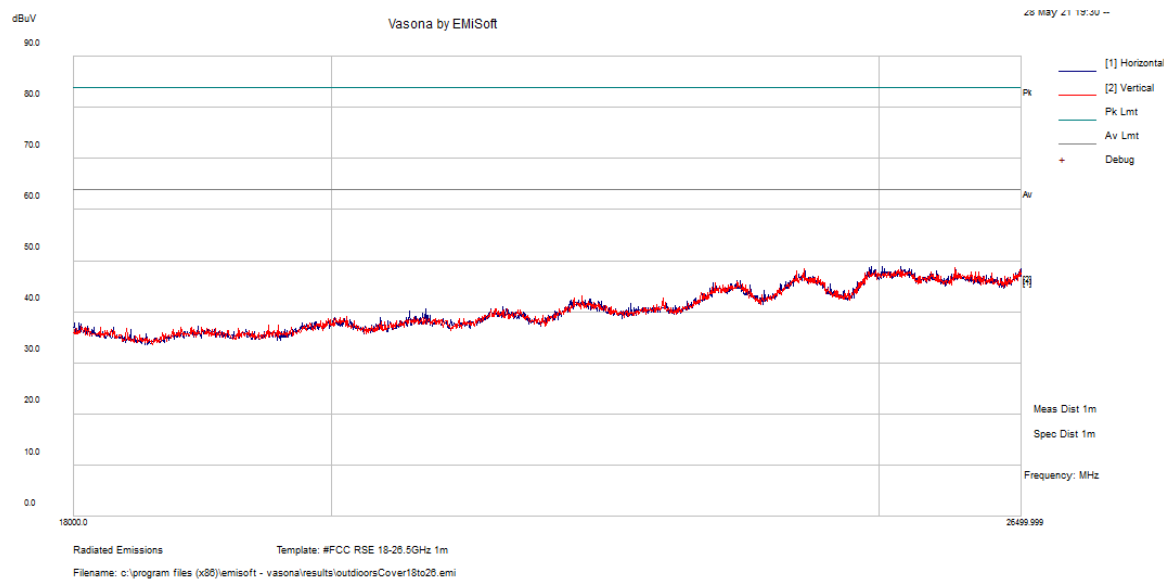
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Comment
30.966	24.84	1.7800	26.62	100	V	344	40	-13.38	QP
359.98125	30.6	-3.1700	27.43	289	H	217	46	-18.57	QP
130.5195	27.82	-4.3300	23.48	172	H	188	43.5	-20.02	QP
477.9785	20.49	-0.1600	20.33	135	H	164	46	-25.67	QP
357.9665	24.32	-3.1800	21.15	197	H	160	46	-24.85	QP
479.974	33.14	-0.1500	32.99	147	V	334	46	-13.01	QP

2) 1 GHz-18 GHz, measured at 1 meter

Freq. (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
1250	51.81	177	130	V	28.90	4.14	35.12	49.73	84	-34.27	Peak
1250	40.52	177	130	V	28.90	4.14	35.12	38.44	64	-25.56	Ave
1250	52.21	115	163	H	28.90	4.14	35.12	50.13	84	-33.87	Peak
1250	40.92	115	163	H	28.90	4.14	35.12	38.84	64	-25.16	Ave
4852	41.97	0	150	V	35.20	8.34	30.42	55.09	84	-28.91	Peak
4852	29.83	0	150	V	35.20	8.34	30.42	42.95	64	-21.05	Ave
4874	43.70	21	162	H	35.20	8.34	30.42	56.82	84	-27.18	Peak
4874	34.58	21	162	H	35.20	8.34	30.42	47.70	64	-16.30	Ave
7286	42.90	0	150	V	36.10	10.78	28.44	61.34	84	-22.66	Peak
7286	30.59	0	150	V	36.10	10.78	28.44	49.03	64	-14.97	Ave
7285	43.41	0	150	H	36.10	10.78	28.44	61.85	84	-22.15	Peak
7285	31.51	0	150	H	36.10	10.78	28.44	49.95	64	-14.05	Ave
16893.78	43.22	62	215	H	42.2	15.12	33.31	67.23	84	-16.77	Peak
16893.78	32.08	62	250	V	42.2	15.12	33.31	56.09	64	-7.91	Ave



3) 18 GHz-26.5 GHz, measured at 1 meter



6 Annex A – Test Setup Photographs

Please refer to the attachment

7 Annex B- EUT External Photographs

Please refer to the attachment

8 Annex C- EUT Internal Photographs

Please refer to the attachment

9 Annex D (Normative) – A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

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 10th day of March 2021.

A blue ink signature of Trace McInturff.

Trace McInturff, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2022

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 ---