



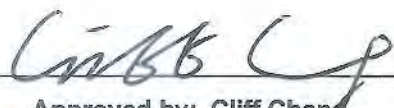
FCC DFS TEST REPORT

FCC ID : BKMAE-8111
Equipment : ELPAP11
Brand Name : EPSON
Model Name : WN8111BEP
Applicant : Seiko Epson Corporation
3-3-5 Owa Suwa-shi, Nagano-ken 392-8502 Japan
Manufacturer : Arcadyan Technology Corporation
No.8, Sec.2, Guangfu Rd., Hsinchu, 30071 Taiwan
Standard : 47 CFR FCC Part 15.407

The product was received on Apr. 25, 2019, and testing was started from May 07, 2019 and completed on May 15, 2019. We, SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory, would like to declare that the tested sample has been evaluated in accordance with the procedures given in FCC KDB 905462 D02 UNII DFS Compliance Procedures New Rules v02 and shown compliance with the applicable technical standards.

The report must not be used by the client to claim product certification, approval, or endorsement by TAF or any agency of government.

The test results in this report apply exclusively to the tested model / sample. Without written approval of SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory, the test report shall not be reproduced except in full.


Approved by: Cliff Chang

SPORTON INTERNATIONAL INC. EMC & Wireless Communications Laboratory
No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.)



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TEL : 886-3-656-9065
FAX : 886-3-656-9085
Report Template No.: CB Ver1.0



Summary of Test Result

Report Clause	Ref Std. Clause	Test Items	Result (PASS/FAIL)	Remark
3.3	FCC KDB 905462 7.8.3	DFS: In-Service Monitoring for Channel Move Time (CMT)	PASS	-
3.3	FCC KDB 905462 7.8.3	DFS: In-Service Monitoring for Channel Closing Transmission Time (CCTT)	PASS	-
3.3	FCC KDB 905462 7.8.3	DFS: In-Service Monitoring for Non-Occupancy Period (NOP)	PASS	-
Note: Since the product is client without radar detection function, only Channel Move Time, Channel Closing Transmission Time and Non-Occupancy Period are required to perform.				

Declaration of Conformity:

The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.

Comments and Explanations:

The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.

Reviewed by: Sam Chen

Report Producer: Sandy Chuang



1 General Description

1.1 Information

1.1.1 RF General Information

Specification Items	Description	
Frequency Range	5250 MHz – 5350 MHz 5470 MHz – 5725 MHz	
Power Type	From host system	
Channel Bandwidth	20/40/80 MHz operating channel bandwidth	
Operating Mode	☐ Master	
	☐ Client with radar detection	
	☒ Client without radar detection	
Communication Mode	☒ IP Based (Load Based)	☐ Frame Based
TPC Function	☐ With TPC	☒ Without TPC
Weather Band (5600~5650MHz)	☒ With 5600~5650MHz	☐ Without 5600~5650MHz
Power-on cycle	NA (No Channel Availability Check Function)	
Software / Firmware Version	Jan 24 2019 20:48:50 version 13.10.246.144 (r709346 CY WLTEST) FWID 01 - 59afd104	
♦ 11a, HT20 and HT40 use a combination of OFDM-BPSK, QPSK, 16QAM, 64QAM modulation. ♦ VHT20, VHT40, VHT80 use a combination of OFDM-BPSK, QPSK, 16QAM, 64QAM, 256QAM modulation. ♦ TPC is not required since the maximum EIRP is less than 500mW (27dBm).		

Note: The above information was declared by manufacturer.

**1.1.2 Antenna Information**

Ant.	Port	Brand	P/N	Antenna Type	Connector	Gain (dBi)		
						WLAN 2.4GHz	WLAN 5GHz	Bluetooth
1	1	Wieson	GT128HT346C-001	Chip	N/A	0.71	4.64	0.71
2	2	Wieson	GT128HT346C-001	Chip	N/A	1.76	3.33	-

Note1: The above information was declared by manufacturer.

Note2: The EUT has two antennas.

<For 2.4GHz Band>**For IEEE 802.11b/g/n mode(1TX/1RX):**

The EUT supports the antenna with TX and RX diversity functions.

Both Port 1 and Port 2 support transmit and receive functions, but only one of them will be used at one time.

<For 5GHz Band>**For IEEE 802.11a/n/ac mode(1TX/1RX):**

The EUT supports the antenna with TX and RX diversity functions.

Both Port 1 and Port 2 support transmit and receive functions, but only one of them will be used at one time.

<For Bluetooth>

Only Port 1 can be used as transmitting/receiving antenna.



1.1.3 DFS Band Carrier Frequencies

There are three bandwidth systems.

For 20MHz bandwidth systems, use Channel 52, 56, 60, 64, 100, 104, 108, 112, 116, 120, 124, 128, 132, 136, 140.

For 40MHz bandwidth systems, use Channel 54, 62, 102, 110, 118, 126, 134.

For 80MHz bandwidth systems, use Channel 58, 106, 122.

Frequency Band	Channel No.	Frequency	Channel No.	Frequency
5250~5350 MHz Band 2	52	5260 MHz	60	5300 MHz
	54	5270 MHz	62	5310 MHz
	56	5280 MHz	64	5320 MHz
	58	5290 MHz	-	-
5470~5725 MHz Band 3	100	5500 MHz	120	5600 MHz
	102	5510 MHz	122	5610 MHz
	104	5520 MHz	124	5620 MHz
	106	5530 MHz	126	5630 MHz
	108	5540 MHz	128	5640 MHz
	110	5550 MHz	132	5660 MHz
	112	5560 MHz	134	5670 MHz
	116	5580 MHz	136	5680 MHz
	118	5590 MHz	140	5700 MHz



1.2 Accessories

N/A

1.3 Support Equipment

Support Equipment				
No.	Equipment	Brand Name	Model Name	FCC ID
A	Notebook	DELL	E4300	N/A
B	Notebook	DELL	E4300	N/A
C	WLAN AP	D-LINK	DIR860L	KA2IR860LA1

1.4 Applicable Standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- ♦ FCC KDB 905462 D02 UNII DFS Compliance Procedures New Rules v02

1.5 Testing Location Information

Testing Location				
☐	HWA YA	ADD : No. 52, Huaya 1st Rd., Guishan Dist., Taoyuan City, Taiwan (R.O.C.) TEL : 886-3-327-3456 FAX : 886-3-327-0973		
☒	JHUBEI	ADD : No.8, Lane 724, Bo-ai St., Jhubei City, HsinChu County 302, Taiwan, R.O.C. TEL : 886-3-656-9065 FAX : 886-3-656-9085		
Test Condition		Test Site No.	Test Engineer	Test Environment
DFS Site		DF01-CB	Kevin Huang	23.2~24.4°C / 56~62%
				May 07, 2019~ May 15, 2019

Test site Designation No. TW0006 with FCC

Test site registered number IC 4086B with Industry Canada.

2 Test Configuration of EUT

2.1 Test Channel Frequencies Configuration

Test Channel Frequencies Configuration	
IEEE Std.	Test Channel Freq. (MHz)
802.11ac (VHT80)	5530 MHz

2.2 The Worst Case Measurement Configuration

The Worst Case Mode for Following Conformance Tests	
Tests Item	Dynamic Frequency Selection (DFS)
Test Condition	Radiated measurement The EUT shall be configured to operate at the highest transmitter output power setting. If more than one antenna assembly is intended for this power setting, the gain of the antenna assembly with the lowest gain shall be used. The DFS radar test signals have been aligned to the direction corresponding to the EUT's maximum antenna gain.
Modulation Mode	802.11ac (VHT80)

3 Dynamic Frequency Selection (DFS) Test Result

3.1 General DFS Information

3.1.1 DFS Parameters

Table D.1: DFS requirement values	
Parameter	Value
Non-occupancy period	Minimum 30 minutes
Channel Availability Check Time	60 seconds
Channel Move Time	10 seconds (Note 1).
Channel Closing Transmission Time	200 milliseconds + an aggregate of 60 milliseconds over remaining 10 second periods. (Notes 1 and 2).
U-NII Detection Bandwidth	Minimum 100% of the 99% power bandwidth (Note 3).

Note 1: Channel Move Time and the Channel Closing Transmission Time should be performed with Radar Type 0. The measurement timing begins at the end of the Radar Type 0 burst.

Note 2: The Channel Closing Transmission Time is comprised of 200 milliseconds starting at the beginning of the Channel Move Time plus any additional intermittent control signals required to facilitate Channel changes (an aggregate of 60 milliseconds) during the remainder of the 10 second period. The aggregate duration of control signals will not count quiet periods in between transmissions.

Note 3: During the U-NII Detection Bandwidth detection test, radar type 0 is used and for each frequency step the minimum percentage of detection is 90%. Measurements are performed with no data traffic.

Table D.2: Interference threshold values	
Maximum Transmit Power	Value (see note)
EIRP $\geq$ 200 mW	-64 dBm
EIRP < 200 mW and PSD < 10dBm/MHz	-62 dBm
EIRP < 200 mW and PSD $\geq$ 10dBm/MHz	-64 dBm

Note 1: This is the level at the input of the receiver assuming a 0 dBi receive antenna.

Note 2: Throughout these test procedures an additional 1 dB has been added to the amplitude of the test transmission waveforms to account for variations in measurement equipment. This will ensure that the test signal is at or above the detection threshold level to trigger a DFS response.

Note3: EIRP is based on the highest antenna gain. For MIMO devices refer to KDB Publication 662911D01.

3.1.2 Applicability of DFS Requirements Prior to Use of a Channel

Requirement	DFS Operational mode		
	Master	Client without radar detection	Client with radar detection
<i>Non-Occupancy Period</i>	Yes	Not required	Yes
<i>DFS Detection Threshold</i>	Yes	Not required	Yes
<i>Channel Availability Check Time</i>	Yes	Not required	Not required
<i>U-NII Detection Bandwidth</i>	Yes	Not required	Yes

3.1.3 Applicability of DFS Requirements during Normal Operation

Requirement	DFS Operational mode		
	Master	Client without radar detection	Client with radar detection
<i>DFS Detection Threshold</i>	Yes	Not required	Yes
<i>Channel Closing Transmission Time</i>	Yes	Yes	Yes
<i>Channel Move Time</i>	Yes	Yes	Yes
<i>U-NII Detection Bandwidth</i>	Yes	Not required	Yes

Additional requirements for devices with multiple bandwidth modes	Master Device or Client with Radar Detection	Client Without Radar Detection
U-NII Detection Bandwidth and Statistical Performance Check	All BW modes must be tested	Not required
Channel Move Time and Channel Closing Transmission Time	Test using widest BW mode available	Test using the widest BW mode available for the link
All other tests	Any single BW mode	Not required

Note: Frequencies selected for statistical performance check (Section 7.8.4) should include several frequencies within the radar detection bandwidth and frequencies near the edge of the radar detection bandwidth. For 802.11 devices it is suggested to select frequencies in each of the bonded 20 MHz channels and the channel center frequency.

3.1.4 Channel Loading/Data Streaming

☐	The data file (MPEG-4) has been transmitting in a streaming mode.
☒	Software to ping the client is permitted to simulate data transfer with random ping intervals.
☒	Minimum channel loading of approximately 17%.
☐	Unicast protocol has been used.

3.2 Radar Test Waveform Calibration

3.2.1 Short Pulse Radar Test Waveforms

Radar Type	Pulse Width (μsec)	PRI (μsec)	Number of Pulses	Minimum Percentage of Successful Detection	Minimum Trials
0	1	1428	18	See Note 1	See Note 1
1A	1	15 unique PRI in KDB 905462 D02 Table 5a	$\text{Roundup}\left\{\left(\frac{1}{360}\right) \times \left(\frac{19 \times 10^6}{PRI}\right)\right\}$	60%	15
1B	1	15 unique PRI within 518-3066, Excluding 1A PRI		60%	15
2	1-5	150-230	23-29	60%	30
3	6-10	200-500	16-18	60%	30
4	11-20	200-500	12-16	60%	30
Aggregate (Radar Types 1-4)				80%	120
Note 1: Short Pulse Radar Type 0 should be used for the detection bandwidth test, channel move time, and channel closing time tests.					

A minimum of 30 unique waveforms are required for each of the short pulse radar types 1 through 4. If more than 30 waveforms are used for short pulse radar types 1 through 4, then each additional waveform must also be unique and not repeated from the previous waveforms. The aggregate is the average of the percentage of successful detections of short pulse radar types 1-4.

3.2.2 Long Pulse Radar Test Waveform

Radar Type	Pulse Width (μsec)	Chirp Width (MHz)	PRI (μsec)	Number of Pulses per Burst	Number of Bursts	Minimum Percentage of Successful Detection	Minimum Trials
5	50-100	5-20	1000-2000	1-3	8-20	80%	30

Each waveform is defined as follows:

- The transmission period for the Long Pulse Radar test signal is 12 seconds.
- There are a total of 8 to 20 Bursts in the 12 second period, with the number of Bursts being randomly chosen. This number is Burst Count.
- Each Burst consists of 1 to 3 pulses, with the number of pulses being randomly chosen. Each Burst within the 12 second sequence may have a different number of pulses.
- The pulse width is between 50 and 100 microseconds, with the pulse width being randomly chosen. Each pulse within a Burst will have the same pulse width. Pulses in different Bursts may have different pulse widths.
- Each pulse has a linear FM chirp between 5 and 20 MHz, with the chirp width being randomly chosen. Each pulse within a transmission period will have the same chirp width. The chirp is centered on the pulse. For example, with a radar frequency of 5300 MHz and a 20 MHz chirped signal, the chirp starts at 5290 MHz and ends at 5310 MHz.

- If more than one pulse is present in a Burst, the time between the pulses will be between 1000 and 2000 microseconds, with the time being randomly chosen. If three pulses are present in a Burst, the time between the first and second pulses is chosen independently of the time between the second and third pulses.
- The 12 second transmission period is divided into even intervals. The number of intervals is equal to Burst Count. Each interval is of length $(12,000,000 / \text{Burst Count})$ microseconds. Each interval contains one Burst. The start time for the Burst, relative to the beginning of the interval, is between 1 and $[(12,000,000 / \text{Burst Count}) - (\text{Total Burst Length}) + (\text{One Random PRI Interval})]$ microseconds, with the start time being randomly chosen. The step interval for the start time is 1 microsecond. The start time for each Burst is chosen independently.

3.2.3 Frequency Hopping Radar Test Waveform

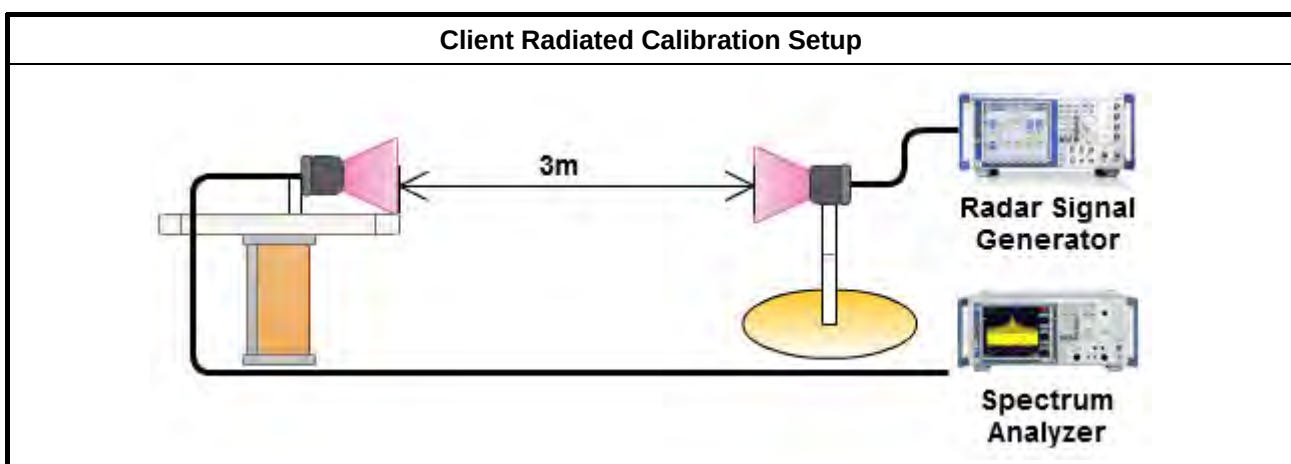
Radar Type	Pulse Width (μsec)	PRI (μsec)	Pulses per Hop	Hopping Rate (kHz)	Hopping Sequence Length (ms)	Minimum Percentage of Successful Detection	Minimum Trials
6	1	333	9	0.333	300	70%	30

The FCC Type 6 waveform uses a static waveform with 100 bursts in the instruments ARB. In addition, the RF list mode is operated with a list containing 100 frequencies from a randomly generated list and it had be ensured that at least one of the random frequencies falls into the UNII Detection Bandwidth of the DUT. Each burst from the waveform file initiates a trigger pulse at the beginning that switches the RF list from one item to the next one.

3.2.4 DFS Threshold Level

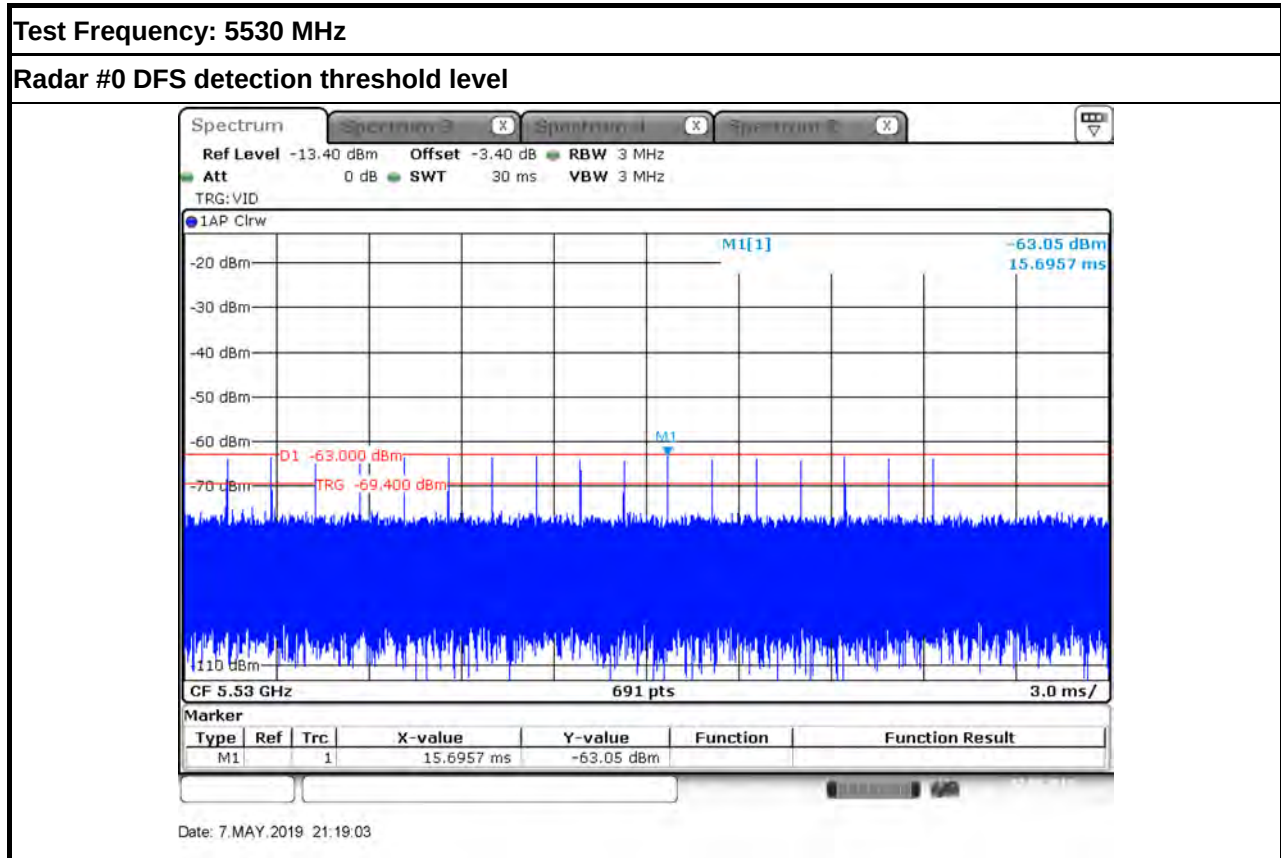
DFS Threshold Level	
DFS Threshold level: -63 dBm	☐ at the antenna connector
	☒ in front of the antenna
The Interference Radar Detection Threshold Level is is $-64 \text{ dBm} + 0 [\text{dBi}] + 1 \text{ dB} = -63 \text{ dBm}$. That had been taken into account the output power range and antenna gain.	

3.2.5 Calibration Setup



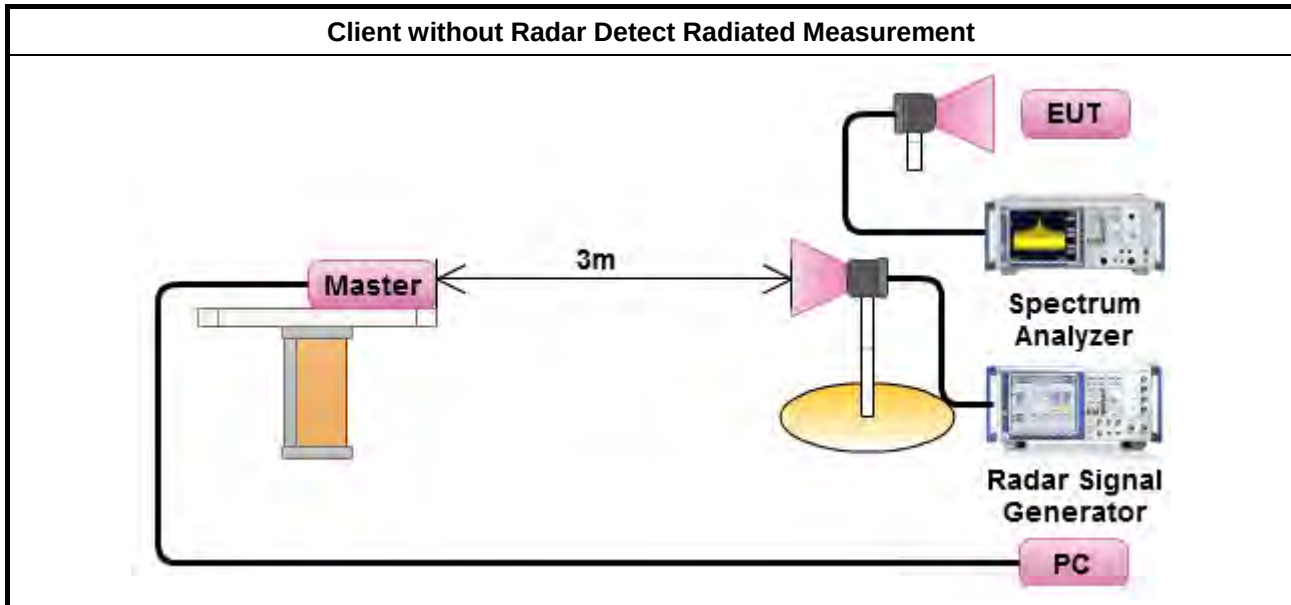


3.2.6 Radar Waveform calibration Plot



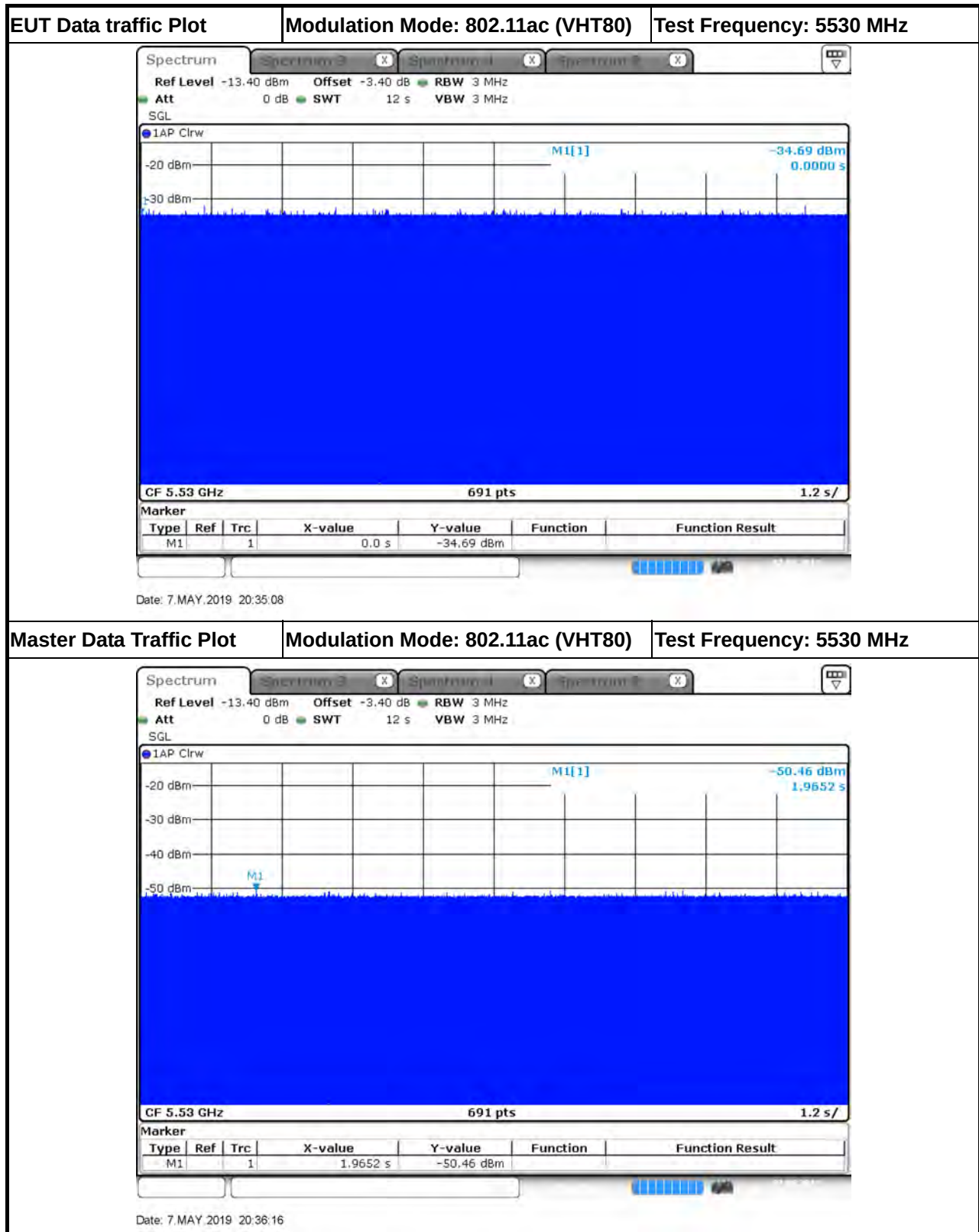
3.2.7 Test Setup

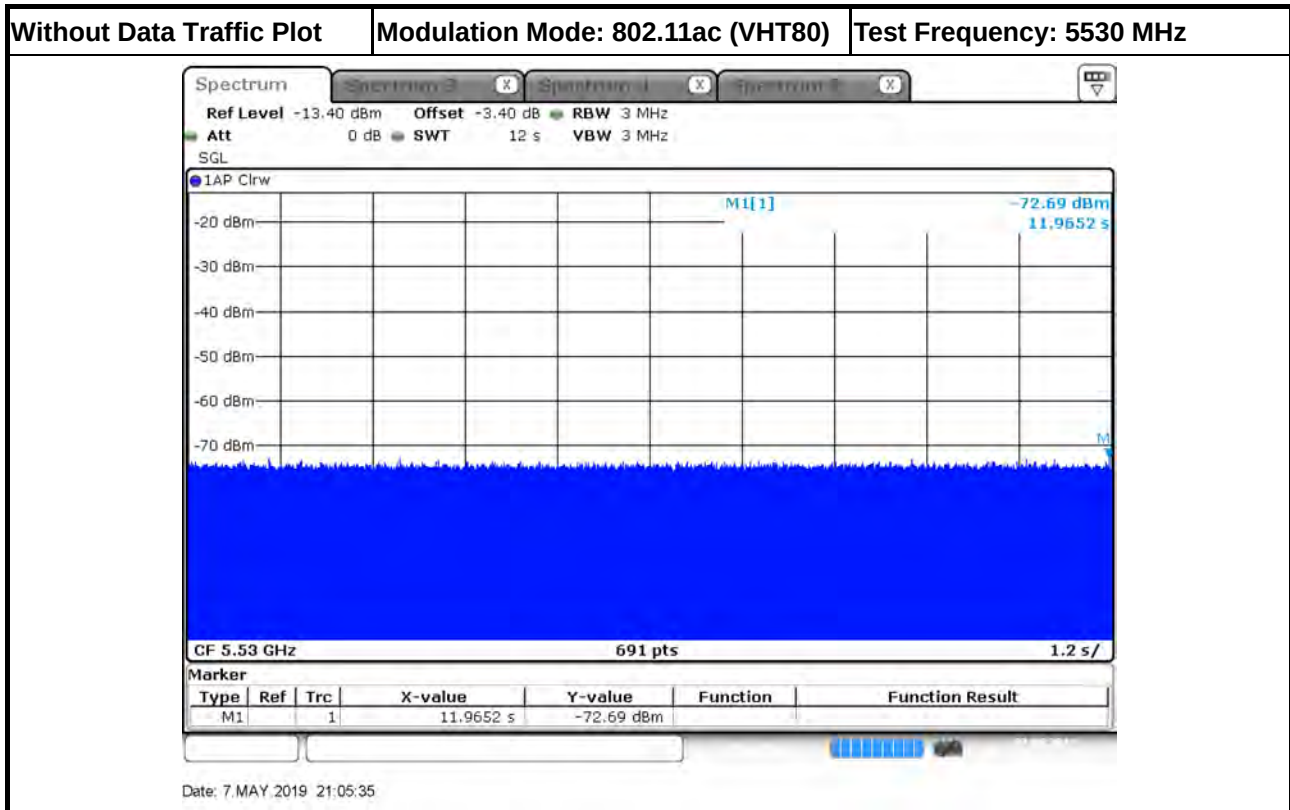
A spectrum analyzer is used as a monitor to verify that the EUT has vacated the Channel within the (Channel Closing Transmission Time and Channel Move Time, and does not transmit on a Channel during the Non-Occupancy Period after the detection and Channel move.





3.2.8 Data traffic Plot





3.3 In-service Monitoring

3.3.1 In-service Monitoring Limit

In-service Monitoring Limit	
Channel Move Time	10 sec
Channel Closing Transmission Time	200 ms + an aggregate of 60 ms over remaining 10 sec periods.
Non-occupancy period	Minimum 30 minutes

3.3.2 Measuring Instruments

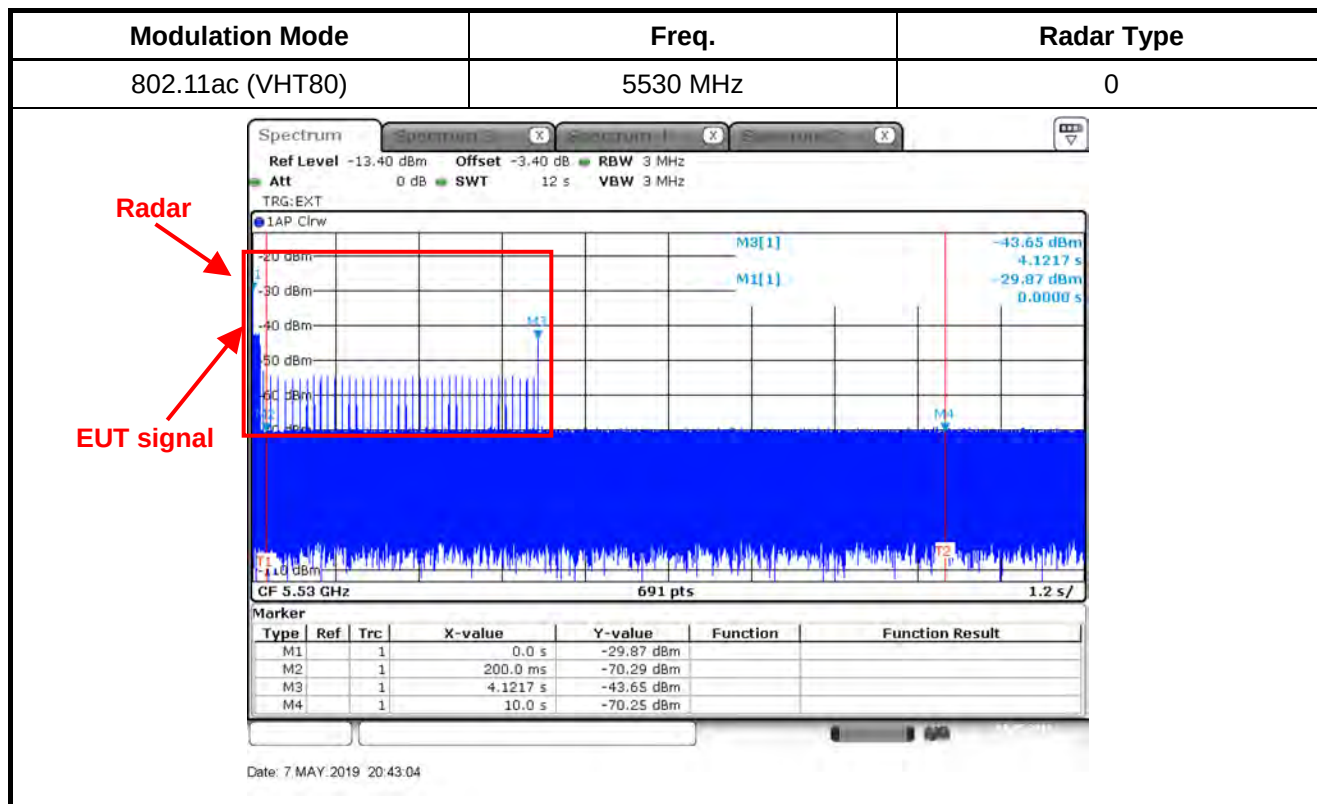
Refer a test equipment and calibration data table in this test report.

3.3.3 Test Procedures

Test Method	
☒	Verified during In-Service Monitoring; Channel Closing Transmission Time, Channel Move Time. Client Device will associate with the EUT. Observe the transmissions of the EUT at the end of the radar Burst on the Operating Channel for duration greater than 10 seconds. Measure and record the transmissions from the EUT during the observation time (Channel Move Time). Compare the Channel Move Time and Channel Closing Transmission Time limits.
☒	Verified during In-Service Monitoring; Channel Closing Transmission Time, Channel Move Time. One 12 sec plot needs to be reported for the Short Pulse Radar Types 0. And zoom-in a 60 ms plot verified channel closing time for the aggregate transmission time starting from 200ms after the end of the radar signal to the completion of the channel move.
☒	Verified during In-Service Monitoring; Non-Occupancy Period. Client Device will associate with the EUT. Observe the transmissions of the EUT at the end of the radar Burst on the Operating Channel for duration greater than 10 seconds. Measure and record the transmissions from the EUT during the observation time (Non-Occupancy Period). Compare the Non-Occupancy Period limits.

**3.3.4 Test Result of Channel Move Time****Modulation Mode: 802.11ac (VHT80)**

Parameter	Test Result	Limit
	Type 0	
Test Channel (MHz)	5530 MHz	-
Channel Move Time (sec.)	4.121	< 10s



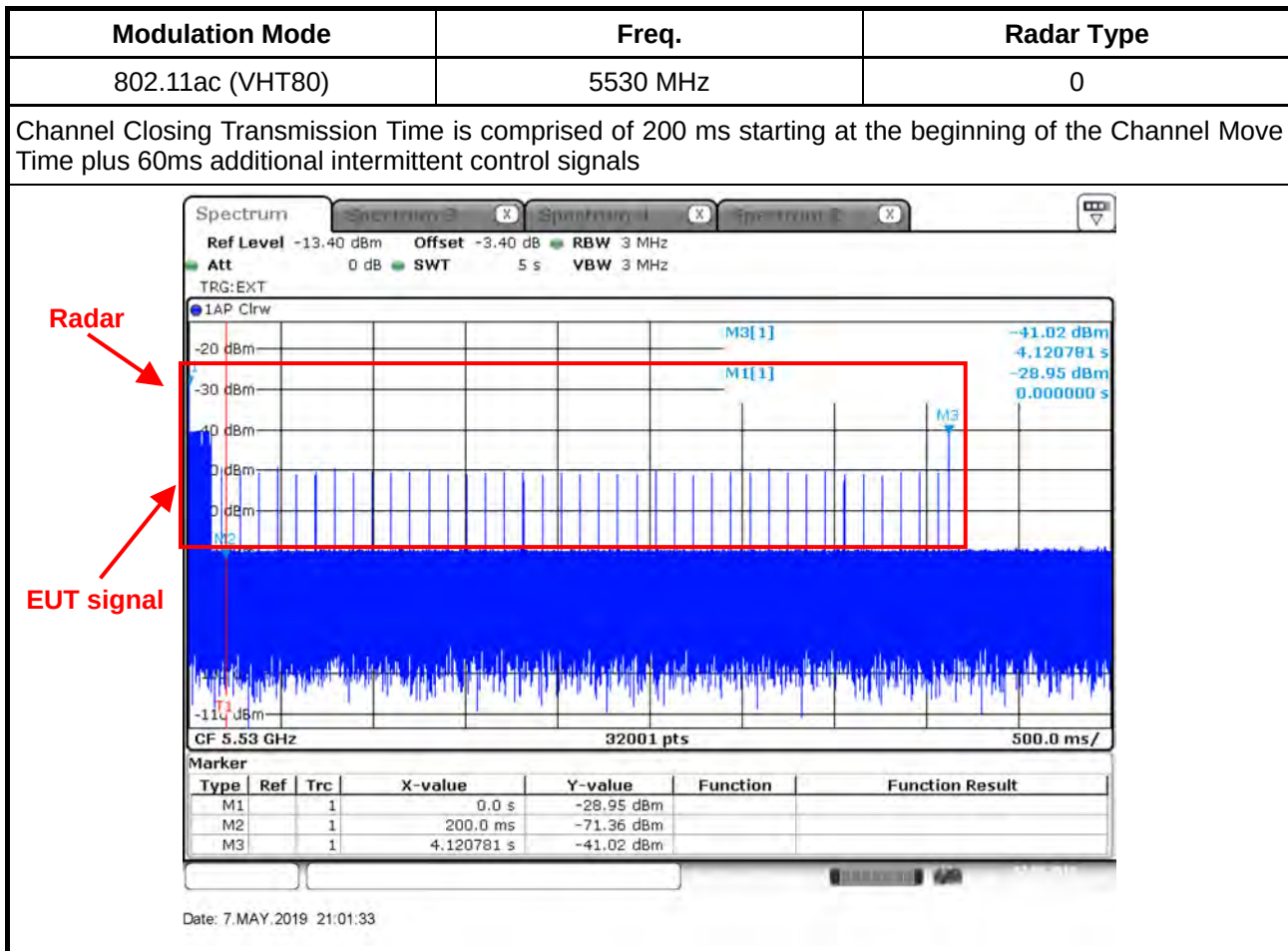


3.3.5 Test Result of Channel Closing Transmission Time

Modulation Mode: 802.11ac (VHT80)

Parameter	Test Result	Limit
	Type 0	
Test Channel (MHz)	5530 MHz	-
Channel Closing Transmission Time (ms) (Note)	0.625	< 60ms

Note: The Channel Closing Transmission Time is comprised of 200 milliseconds starting at the beginning of the Channel Move Time plus any additional intermittent control signals required to facilitate a Channel move (an aggregate of 60 milliseconds) during the remainder of the 10 seconds period. The aggregate duration of control signals will not count quiet periods in between transmissions.



Dwell is the dwell time per spectrum analyzer sampling bin.

S is the sweep time

B is the number of spectrum analyzer sampling bins

C is the intermittent control signals of Channel Closing Transmission Time

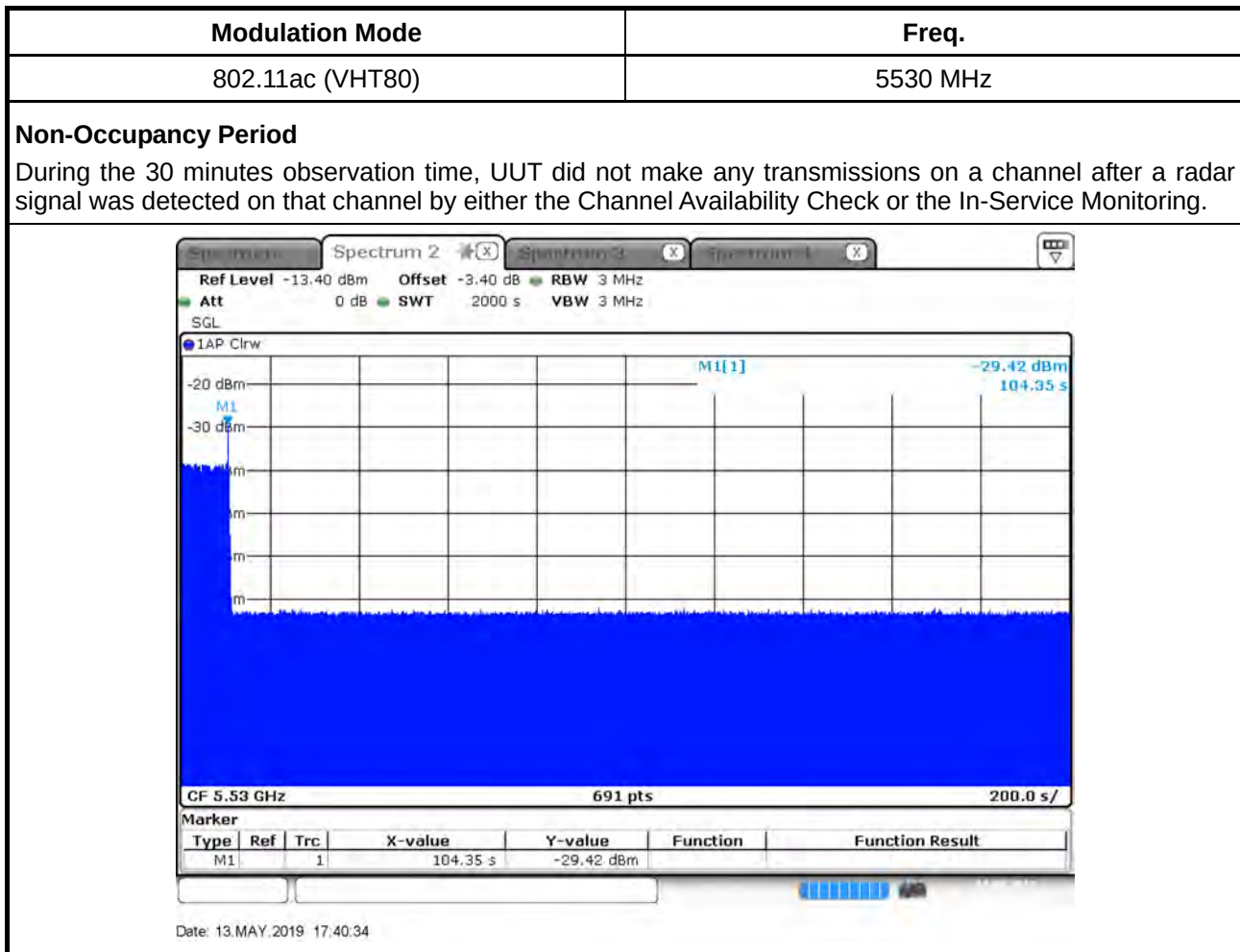
N is the number of spectrum analyzer sampling bins (intermittent control signals) showing a U-NII transmission

Dwell (0.156 ms)= S (5000 ms) / B (32000)

C (0.625 ms) = N (4) X Dwell (0.156 ms)

**3.3.6 Test Result of Non-Occupancy Period****Modulation Mode: 802.11ac (VHT80)**

Parameter	Test Result	Limit
	Type 0	
Test Channel (MHz)	5530 MHz	-
Non-Occupancy Period (min.)	≥ 30	≥ 30 min

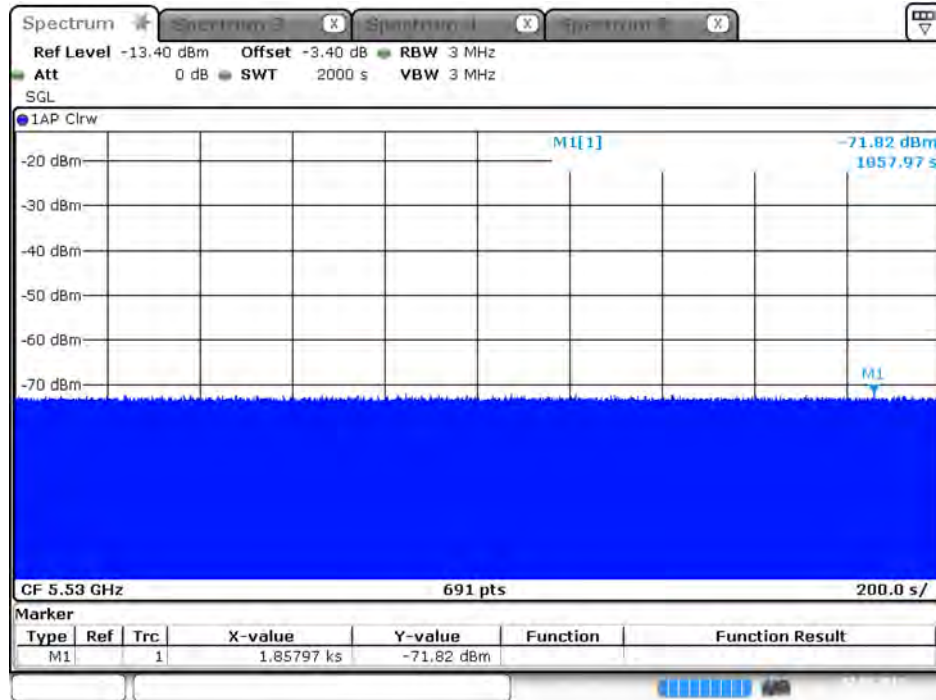




Non-associated test

Master was off.

During the 30 minutes observation time, The UUT did not make any transmissions in the DFS band after UUT power up.



Date: 7.MAY.2019 20:21:09



4 Test Equipment and Calibration Data

Instrument	Manufacturer	Model No.	Serial No.	Characteristics	Calibration Date	Calibration Due Date	Remark
Spectrum Analyzer	R&S	FSV40	101026	9kHz~40GHz	Sep. 28, 2018	Sep. 27, 2019	Radiated (DF01-CB)
Vector Signal generator	R&S	SMU200A	102782	100kHz-6GHz	Jan. 16, 2019	Jan. 15, 2020	Radiated (DF01-CB)
Horn Antenna	COM-POWER	AH-118	071187	1GHz – 18GHz	Jun. 29, 2018	Jun. 28, 2019	Radiated (DF01-CB)
Horn Antenna	COM-POWER	AH-118	071042	1GHz – 18GHz	Dec. 24, 2018	Dec. 23, 2019	Radiated (DF01-CB)
RF Power Divider	ANAREN	2 Way	DFS-01-DV-02	1GHz ~ 6GHz	Oct. 08, 2018	Oct. 07, 2019	Radiated (DF01-CB)
RF Power Divider	MTJ	2 Way	DFS-01-DV-03	1GHz ~ 6GHz	Oct. 08, 2018	Oct. 07, 2019	Radiated (DF01-CB)
RF Power Divider	ANAREN	4 Way	DFS-01-DV-01	1GHz ~ 6GHz	Oct. 08, 2018	Oct. 07, 2019	Radiated (DF01-CB)
RF Cable-high	Woken	RG402	High Cable-57	1 GHz –18 GHz	Oct. 08, 2018	Oct. 07, 2019	Radiated (DF01-CB)
RF Cable-high	Woken	RG402	High Cable-58	1 GHz –18 GHz	Oct. 08, 2018	Oct. 07, 2019	Radiated (DF01-CB)

Note: Calibration Interval of instruments listed above is one year.



5 Measurement Uncertainty

Test Items	Uncertainty	Remark
Radiated Emission	2.9 dB	Confidence levels of 95%