

AN1200.06

Application Note:

FCC Part 15.247 Rules Systems Using Digital Modulation

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1 Introduction

The wideband operation and high data rate capabilities of Semtech's family of Wireless ISM band devices makes them suitable candidates for low cost applications. In most of the low cost applications the program memory and CPU power of the microcontroller is very limited especially if it is battery operated. The main concern in such applications is to make protocol and accessing methods as simple as possible to let the program memory and data memory run the application program. Most of these applications establish communication for a limited time (a few hundred microseconds) and then go into sleep mode to save power. During active time these applications try to send as much data as possible in short period of time. The high data rate operation and low power consumption of the Semtech's ISM radios makes them a perfect fit for these applications.

The main issue with high data rate and long range communication systems not using Spread Spectrum Techniques in North America is that of maximum output power limitation.

Historically, for non-Frequency Hopping Spread Spectrum Systems (FHSS), the FCC required that a Direct Sequence Spread Spectrum (DSSS) approach was applied. Direct Sequence required the direct multiplication of the binary data at the transmitter by a pseudo-random bit sequence to generate a transmitted data stream defined in terms of a kilochips/second data rate and to provide a minimum of 10 dB processing gain in the receiver during the demodulation process.

At the receiver, the reverse process was applied to recover the original binary data stream. The redundancy provided by multiplying each data bit by the pseudo-random "spreading" sequence, resulted in the processing gain. For example, in a low bit rate application, multiplying each bit by an 11 bit coding sequence could theoretically improve the link budget by 10 dB if bit rate is decreased by the same factor.

The effect of the spreading process was to generate a transmitted modulation spectrum that approaches that of "random" (or white) noise. Since the power spectral density of random noise is less than that of a coherent signal at the same power level, this allows for a higher transmit power level to be maintained whilst still complying with FCC regulations.

In recent years this rule has been changed and the FCC now permits systems that employ digital modulation techniques that have an occupied 6 dB bandwidth of at least 500 kHz, to have a power spectral density of up to +8 dBm in 3 kHz bandwidth without the need to employ Spread Spectrum techniques.

The programmable frequency deviation and output power of Semtech's Wireless ISM band devices easily fit these criteria.

Whilst this application note focuses on the SX1231, the methodology is equally valid for the both the SX1211 ultra-low power ISM band transceiver and the XE120x range of ISM transceivers.

Ordinarily 902 - 928 MHz radio systems which do not exploit code or frequency hopping are constrained to Part 15.249 output powers. The purpose of this application note is to assist the engineer in understanding how to use the 'digitally modulated' of the part 15 regulations to avail of increased output power for Semtech ISM band radios without resorting to spreading.

It is intended that this report is read in conjunction with the following documents:

- Part 15 of Title 47 of the Code of Federal Regulations
- FCC Office of Engineering and Technology; "Measurement of Digital Transmission Systems Operating under Section 15.247"; March 23, 2005
- Semtech Application Note AN1200.04 "FCC Regulations for ISM Band Devices: 902 - 928 MHz"

2 An Overview of FCC Regulations

In the United States, the FCC is the body responsible for implementing rules to limit the potential for interference to licensed operations by low-power, non-licensed transmitters. These rules are documented in Part 15 of Title 47 of the Code of Federal Regulations (“47 CFR Part 15”), and it is recommended that the engineer refers to an up to date version of this regulation.

2.1 FCC Part 15

Operation to FCC Part 15 is subject to two conditions. Firstly, the device may not cause harmful interference, and secondly the device must accept any interference received, including interference that may cause undesired operation. Hence, there is no guaranteed quality of service when operating a Part 15 device.

For operation in the 902 - 928 MHz band, a low-power, non-licensed device will generally fall within the remit of the following subparts of the regulation:

- Part 15.247: Frequency Hopping and Digitally Modulated Intentional Radiators
- Part 15.249: General Non-Licensed Intentional Radiators

This application note will focus on Part 15.247 as it relates to Systems using Digital Modulation operating in the 902 – 928 MHz band.

2.2 Part 15.247

Devices that operate to FCC Part 15.247 are limited to frequency hopping and digitally modulated systems.

2.2.1 Digital Modulation System Requirements

The FCC, under the definition of systems using digital modulation techniques, allows a device to comply with these regulations without necessarily implementing Direct Sequence Spread Spectrum (DSSS), provided that the following requirements are met:

1. The minimum 6 dB bandwidth of the signal shall be at least 500 kHz.
2. The maximum permitted peak conducted output power is +30 dBm (1 W). However, 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.
3. If the antenna used has a directional gain in excess of 6 dBi then the conducted output power described shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.
4. In any 100 kHz bandwidth outside the frequency band of operation the power 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.
5. Radiated harmonic and spurious emissions which fall within the restricted bands, as defined in FCC Part 15.205, must comply with the radiated emission limits specified in FCC Part 15.209.

From the above it can be seen that compliance with digital modulation schemes implies wideband modulation. Wideband operation requires the transmitter to be capable of high frequency deviation and high data rates; either with raw NRZ data or “data-whitened” spread spectrum communications.

In addition the receiver requires not only that the bandwidth be capable of correctly demodulating the transmitted data but that the sensitivity is not adversely degraded so as to negate the benefits of being able to transmit at significantly higher output power.

In both the above respects, Semtech’s family of ISM band devices is ideally suited for such applications.

3 Measurement of Signal Bandwidth and Spectral Density for Digital Modulation Systems

For a complete description of all the RF measurements and procedures required to ensure compliance with either Part 15.247 or 15.249, please refer to the Semtech Application Note AN1200.04 "FCC Regulations for ISM Band Devices: 902 - 928 MHz."

3.1 Signal Bandwidth

As an example of signal bandwidth measurement, Figure 1 illustrates a carrier modulated with a data stream of 76.8 kb/s and a peak frequency deviation of 140 kHz, measured using a spectrum analyzer of frequency span wide enough to capture the entire modulation envelope and RBW of 100 kHz.

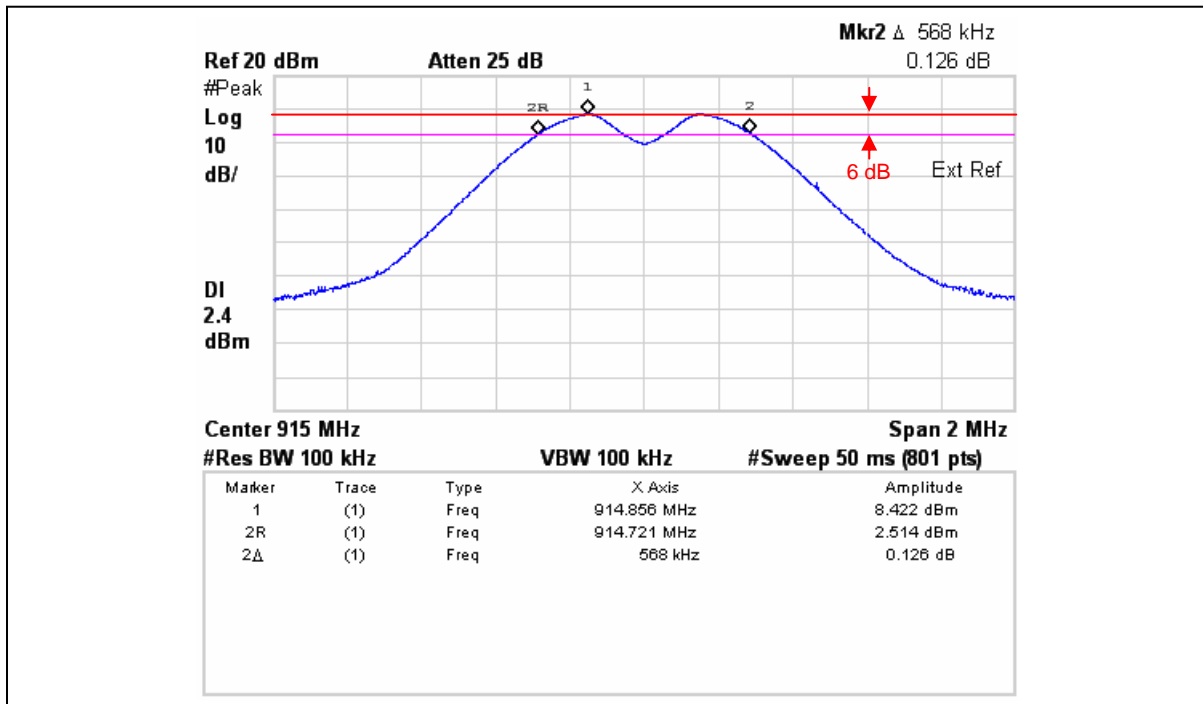


Figure 1: Measurement of Signal Bandwidth

3.2 Power Spectral Density

The FCC requires that the method of measuring the power spectral density be similar to that used to measure the conducted output power.

The recommended procedure for measuring peak spectral density is outlined below:

1. Center the spectrum analyzer on to the emission peak(s) within the signal passband. Set the RBW to 3 kHz and VBW to greater than the RBW. The sweep time should be set to the frequency span/3kHz (i.e. for a 1.5 MHz span, the sweep time should be 500 seconds). The peak measured signal level should not exceed + 8 dBm.
2. Take into account the following and correct the measured results as defined below.
3. If the measured spectral line spacing is greater than 3 kHz then no correction factor is required.
4. If the measured spectral line spacing is equal or less than 3 kHz, reduce the RBW until the individual spectral lines are resolved. The measured results must be normalized to 3 kHz by summing the power of all the individual spectral lines within a 3kHz band (in linear power units) to determine compliance.
5. If the spectrum line spacing cannot be resolved on the available spectrum analyzer, the noise density function on most modern conventional spectrum analyzers will directly measure the

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noise power density normalized to a 1 Hz noise power bandwidth. Add 35 dB for correction to 3 kHz.

An example of the measuring the peak power spectral density measured is shown in Figure 2. Since the spectral line spacing is greater than 3 kHz, no correction factor is required. As outlined in Section 1, there is now no longer a requirement for the addition of processing gain in the signal path, which was typically achieved by the implementation of an encoding/decoding algorithm or “chip spreading”

It is possible to transmit at a higher carrier power level whilst still complying with FCC regulations, as illustrated in Figure 3.

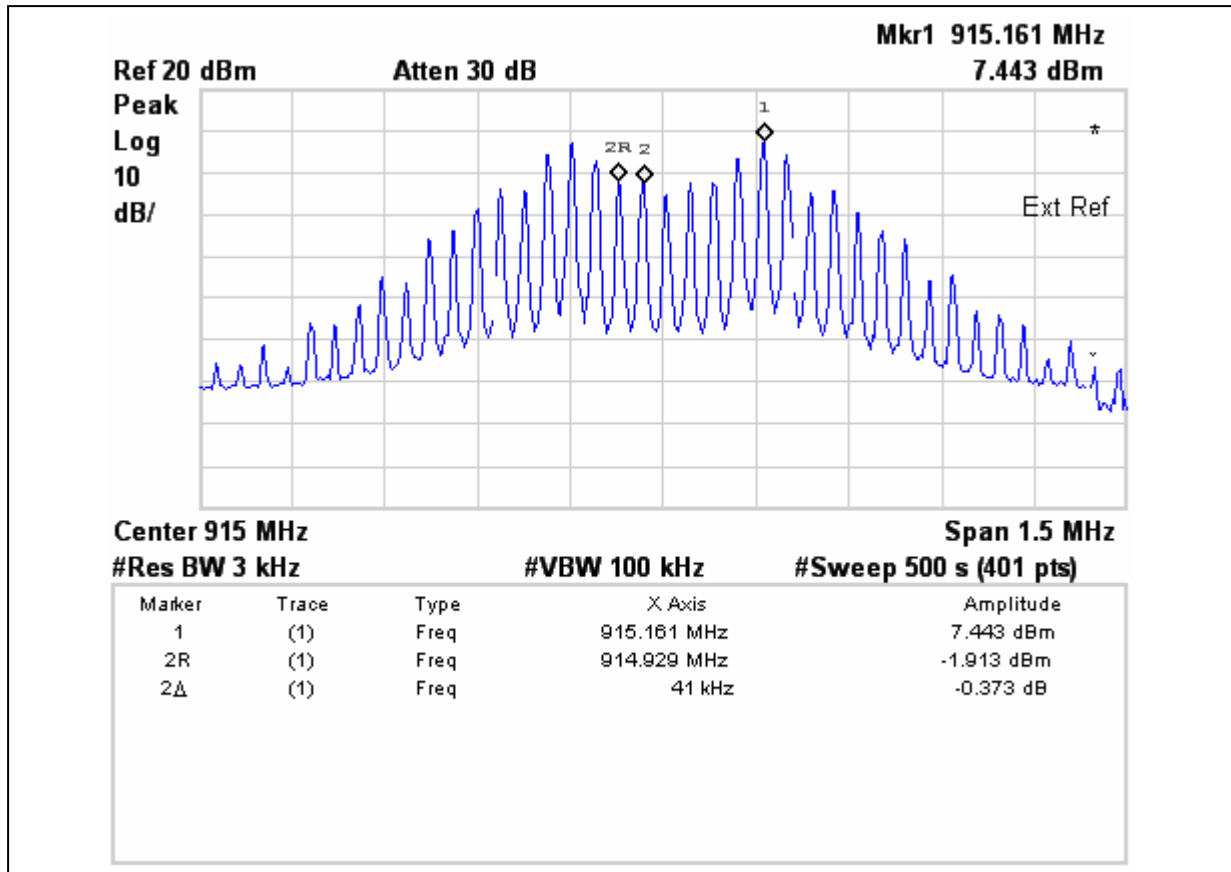


Figure 2: Measurement of Power Spectrum Density

Figures 2 and 3 provide an illustration of the indicated power spectral density and peak output power when measured following the procedures recommended by the FCC for a carrier modulated with a 76.8 kb/s preamble data stream at a peak frequency deviation of 140 kHz.

Whilst a preamble data stream of alternating “1” and “0” is not particularly representative of a normal data transmission, this example does illustrate how implementing a digital modulation transmission scheme in compliance with FCC 15.247 enables a much higher peak output power than the power spectral density to be transmitted.

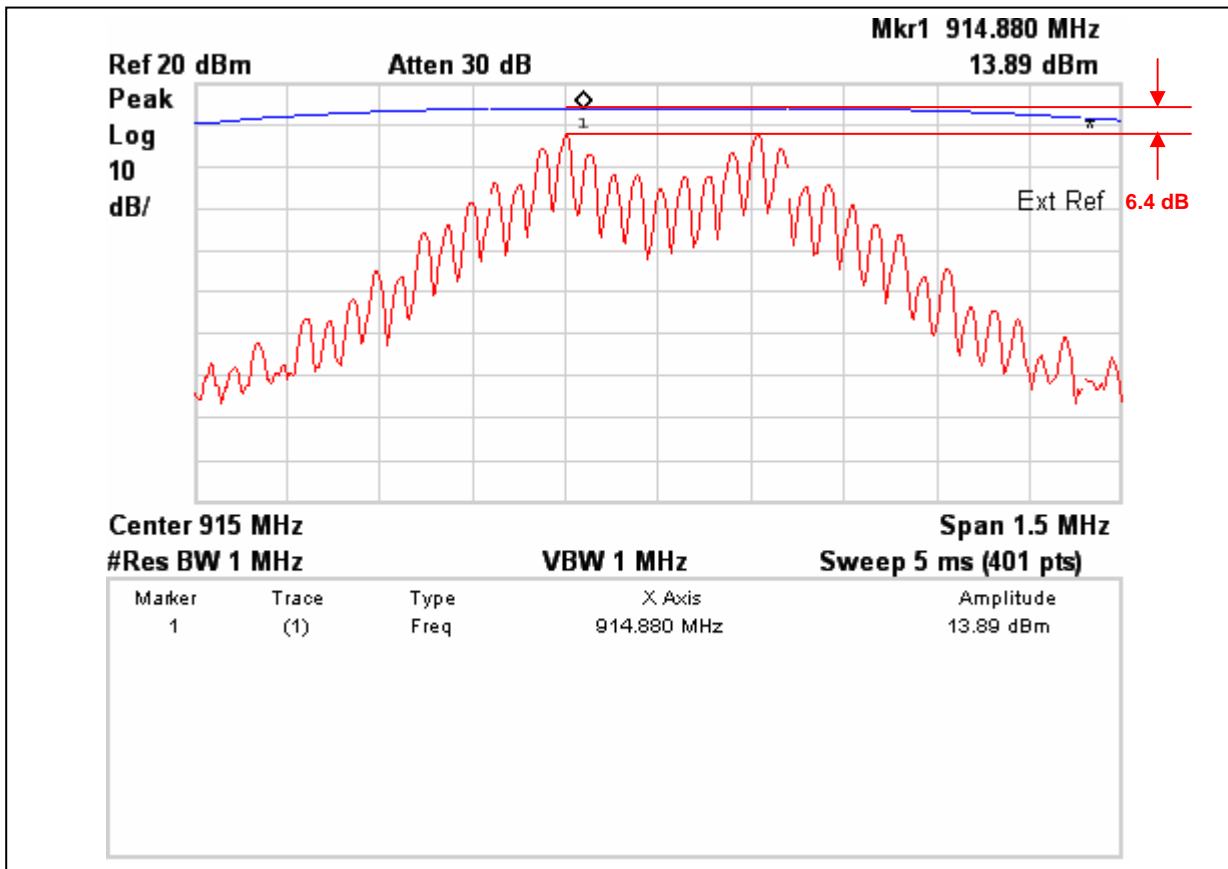


Figure 3: Comparison of Measured Peak Output Power and Power Spectral Density

Alternatively, it is recommended that the average power spectral density is measured using the following procedure:

1. Center the spectrum analyzer on to the emission peak(s) within the signal passband. Set the RBW to 3 kHz and VBW to greater than 9 kHz. The sweep time should be set to automatic.
2. The spectrum analyzer's peak detector mode should be used. A sample detector may be employed providing that; (i) the bin width (i.e. frequency span/number of points in the spectrum display) is less than 0.5 RBW; (ii) the transmission pulse or sequence of pulses remains at maximum transmit power throughout each of the 100 sweeps of averaging and that the interval between pulses is not included in any of the sweeps (e.g., 100 sweeps should occur during one transmission, or each sweep gated to occur during a transmission). If this condition cannot be met then a peak detector set to max hold must be used.
3. Select video triggering and ensure that the trigger level only triggers on transmitted pulses at the maximum power level. The transmitter must operate at maximum power for the entire sweep of every sweep. If the device transmits continuously, with no off intervals or reduced power intervals, the trigger may be set to "free run".
4. Average over 100 sweeps and determine the peak from the resulting trace average. Ensure that in averaging mode that the spectrum analyzer does not default to sample detector mode.

4 Using Semtech Wireless ISM Band Devices

From Section 3.2 above, it can be noted that with a minimum RBW of 100 kHz and a VBW greater or equal to the RBW, the indicated peak to peak signal bandwidth is much greater than the twice the dynamic single sideband bandwidth that defines the minimum receive filter bandwidth (BBW).

The dynamic single sideband bandwidth is defined as:

$$BBW_{SSB} = \Delta f + \frac{BR}{2} \quad (\text{kHz})$$

For the example illustrated above, the dynamic single sideband bandwidth of a 76.8 kb/s data stream modulated at a peak frequency deviation of 140 kHz is 178.4 kHz, thus the double sideband bandwidth is twice this value, or 356.8 kHz.

Hence, to obtain a measured 6 dB signal bandwidth of 500 kHz, it is not always necessary to transmit at a frequency deviation in excess of 200 kHz. The wide range of programmable receive filter bandwidths of Semtech's ISM band radios are ideally suited to optimizing receiver bandwidth to transmitted spectrum, thus maximizing link budget.

Note that in the examples below that the VBW of the spectrum analyzer is set equal to the RBW for illustrative purposes only to highlight that the configured frequency deviation is the maximum required to ensure compliance with FCC regulations.

Whilst this application note focuses on the SX1231, the methodology is equally valid for the entire Semtech ISM band wireless product range.

The results for transmitter 6 dB bandwidth, power spectral density and receiver sensitivity of the SX1231 for both FCC Part 15.249 and in compliance with the digital modulation system requirements of FCC Part 15.247 are tabulated below. As has been noted, the example of power spectral density measurements using a preamble data stream is not representative of typical data transmissions. For the purposes of the analysis below, a PN15 data stream has been used.

Bit Rate (kb/s)	f_{DEV} (kHz)	Signal SSB (kHz)	Filter BWSSB (kHz)	Sensitivity (dBm)	TX PWR (dBm)	6 dB BW (kHz)	PSD (dBm/ 3 kHz)	Link Budget (dB)	
								Part 15.249	Part 15.247(a)(2)
4.8	5	7.4	10	-113.9	-1	N/A	-	112.9	-
4.8	150	152.4	200	-110.4	7.5	570	7.5	-	117.9
38.4	40	59.2	83	-106.9	-1	N/A	-	105.9	-
38.4	150	169.2	200	-104.3	8.5	570	7.3	-	112.8
76.8	80	118.4	166	-104.2	-1	N/A	-	103.2	-
76.8	140	178.4	250	-103.7	10.4	540	7.8	-	114.1

Table 1: SX1231 Typical Link Budget Enhancement for FCC 15.247 over FCC 15.249

At higher data rates, it can be expected that the mode of operation will typically comply with the requirements of FCC Part 15.247, and an example of link budgets obtained with the SX1231 is tabulated below:

Bit Rate (kb/s)	f_{DEV} (kHz)	Signal SSB (kHz)	Filter BWSSB (kHz)	Sensitivity (dBm)	TX PWR (dBm)	6 dB BW (kHz)	PSD (dBm/ 3 kHz)	Link Budget (dB)
100	140	190	250	-102.6	10.8	550	7.7	113.4
300	150	300	400	-97.6	11.8	560	7.3	109.4

Table 2: SX1231 Typical Link Budget at Higher Data Rates

Note that the actual power spectral density will depend upon the content or bit-pattern of the data stream transmitted

5 Conclusions

This document shows that the Semtech's ISM band radios can be used for increasing the output power above the classical FCC Part 15.249 conducted output power limitation of typically -1 dBm without using complex spread spectrum techniques such as Frequency Hopping Spread Spectrum. This report shows that the higher the bit rate the higher the advantage of using the Semtech's radios in term of link budget.

Another advantage of Semtech's radios is the programmable output power (up to +17 dBm for the SX1231), which allows this output power to be dynamically adjusted depending on the received signal level in order to minimize the power consumption of the system.

As described previously, the use of data whitening can increase the output power limit still further (whilst maintaining the spectral power density limits outlined above). The data whitening process distributes 1 and 0 FSK patterns equally about the transmission spectrum.

The data whitening functions of the SX1231 and SX1211 easily allows for this mode of operation, if required.

Additionally, coding gain could improve drastically the budget link. For example as low BR application, a 1024 bits coding could improve the budget link by 30 dB if BR is decreased by the same factor. The Semtech XE1203F incorporates an 11-bit Barker Encoder / Decoder, which provides for 10 dB of processing gain under the above conditions.

6 Further Information

The latest published version of Part 15 of Title 47 of the Code of Federal Regulations can be obtained from the National Archives and Records Administration Code of Federal Regulations website at the following link: <http://www.access.gpo.gov/nara/cfr/cfr-table-search.html#page1>

FCC Office of Engineering and Technology; "Understanding the FCC Regulations for Low-Power, Non-Licensed Transmitters (OET Bulletin 63); February 1996:
http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet63/oet63rev.pdf

FCC Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems (DA 00-705); March 30, 2000:
http://www.fcc.gov/Bureaus/Engineering_Technology/Public_Notices/2000/da000705.txt

FCC Office of Engineering and Technology; "Measurement of Digital Transmission Systems Operating under Section 15.247"; March 23, 2005:
http://gulfoss2.fcc.gov/prod/oet/forms/blobs/IDRetrieve.cgi?attachment_id=20422

The Federal Communications Commission website can be found at: <http://www.fcc.gov/>

The Office of Engineering and Technology of the FCC home page: <http://www.fcc.gov/oet/>

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Contact information

Semtech Corporation
Advanced Communication and Sensing Products Division
200 Flynn Road, Camarillo, CA 93012
Phone: (805) 498-2111 Fax: (805) 498-3804
E-mail: sales@semtech.com
Support_RF@semtech.com
Internet: <http://www.semtech.com>