

Date 06/06/2011	Document C63.4-2009
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National Committee	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
C63®	5.5	1	Technical	<p>In response to the explanation published by ANSI C63, dated February 17, 2011, of clause 8.3.2.2 of C63.4-2009 about the interpretation of “keeping the source of emission in the cone of radiation” it is unclear how the validation of the test site is to be performed and how the approach of absorber coverage suggested in ANSI C63.4-2009 clause 5.5 is to be implemented. The explanation states that tilting of the antenna is required during the measurement process and a planar scan is not acceptable.</p> <p>ANSI C63.4-2009 states in clause 5.5 that a site is deemed suitable for measurements above 1 GHz if it meets the SVSWR criterion called out in CISPR 16-1-4 (2007) or an area of 2.4m x2.4 m is covered with absorbers. The CISPR 16-1-4 based process only determines the SVSWR based on a planar orientation of the antennas. No tilting of the receiving antenna towards the ground is involved. It is clear that tilting of the antenna downward towards the floor will illuminate the part of the test environment that may not be covered by absorbers. Since the minimum absorber coverage is not specifically stated in CISPR 16-1-4 and only evidence of compliance with the acceptance criterion is to be provided, a test laboratory can determine its own way of covering the ground plane with absorbers to meet the SVSWR criterion. Tilting the receiving antenna, as required per explanation through the measurement process, introduces a test setup that has not been verified. Therefore, it cannot</p>	none	<p>There are no changes needed.</p> <p>As stated in C63.4-2009, section 5.5, there are two parts for site validation requirements above 1 GHz. Both of these shall be met.</p> <p>1) Facilities suitable for measurements in the frequency range 30 MHz to 1000 MHz are considered suitable for the frequency range 1 GHz to 40 GHz.</p> <p>2) SVSWR criteria as defined in CISPR 16-1-4:2007 or use of a 2.4m by 2.4m section of RF absorber is sufficient for determining suitability of a test site for the C63.4 emissions measurements above 1 GHz.</p>

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				<p>be assumed that the site meets the SVSWR criterion which again is based on a planar orientation of the antennas involved. During the measurement process the tilting may therefore reflections from the floor which may lead to erroneous measurement results, based on the definition of the test environment in CISPR 16-1-4. This in turn may lead to perceived product failures which penalize manufacturers and test houses.</p> <p>The committee is asked to clearly define how the SVSWR method is to be modified in order to be applicable to antenna tilting. It is not technically feasible to validate a test environment is a way that differs significantly from the process applied during EUT measurements.</p> <p>The second acceptance criterion (absorber coverage of 2.4m x 2.4 m between EUT and antenna) was based on a planar antenna orientation only. Tilting of the antenna will certainly require a larger absorber coverage area. The committee is asked to provide an update either on how the required absorber coverage area is to be determined (which is based on the pattern of the receiving antenna) or provide revised information for the proper absorber coverage to address the tilting of the receive antenna.</p> <p>It is to be noted that a simple reference to future revision of ANSI C63.4-2009 to address this matter is unacceptable since users of ANSI C63.4-2009 do have to apply the site validation (or setup) right now and tilting is required during the measurement process right now.</p>		