



*Testing Tomorrow's Technology*

May 11, 2023

Ms. Debbie LeMaster  
Radio Systems Corporation  
10427 Petsafe Way  
Knoxville, TN 37932

Dear Ms. LeMaster:

Enclosed herewith, please find Radio Systems Corporation's file copy of the FCC Part 95 Certification Report for the Radio Systems Corporation Model RFA-621 Base station. The base station is part of a larger system under SKU number PIF00-17777. For the purpose of this report, only the model base station has been evaluated.

Please keep the report in your files as proof that the product has been successfully tested and evaluated for compliance with Part 95 Subpart J.

If you have any questions, please don't hesitate to call. Thank you very much for your business.

Sincerely,

A handwritten signature in cursive script, reading "Alan Ghasiani", is shown within a light gray rectangular box.

Alan Ghasiani  
Consulting Engineer - President

**3505 Francis Circle Alpharetta, GA 30004**  
**PH: 770-740-0717 Fax: 770-740-1508**  
**[www.ustech-lab.com](http://www.ustech-lab.com)**



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## **Report of**

**Title 47 CFR Part 95 Subpart J,  
Multi User Radio Services (MURS) and  
TIA-603-E (2016) Land Mobile FM or PM- Communications Equipment  
Measurement and Performance Standard**

**For the  
Radio Systems Corporation**

**Model: RFA-621  
FCC ID: KE3-30035901**

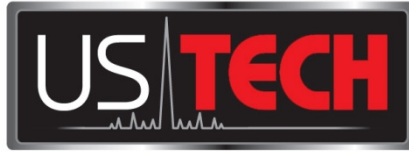
**Issue Date: May 11, 2023**

**Test Dates: May 4-10, 2023**

**UST Project No.: 23-0066**

Total Number of Pages Contained in this Report: 19

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I certify that I am authorized to sign for the test facility and that all of the statements in this report and in the Exhibits attached hereto are true and correct to the best of my knowledge and belief:

US TECH (Agent Responsible For Test):

By: 

Name: George Yang

Title: Laboratory Manager

Date: May 11, 2023



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## **1 General Information**

### **1.1 Product Description**

The Equipment under Test (EUT) is the Radio Systems model RFA-621 base unit. The EUT is part of the PetSafe Precision GPS Customizable Fence model PIF00-17777. The Percision GPS Customizable Fence system uses GPS technology to keep your dog within a boundary you design. The system consists of three main parts: the My PetSafe® app, the base unit (EUT) and the collar. The base unit is the hub for communication with your dog's collar. The base unit and collar communicate with one another through a two-way radio frequency (RF) link while the collar is within range of the base unit (about 300 feet).

The EUT communicates to smart device via the My PetSafe® app. It contains a FCC Certified Wi-Fi radio module bearing FCC ID: 2AC7Z-ESP32WROVERE and IC: 21098- ESPWROVERE in addition to being able to transmit in the MURS band. The Wi-Fi radio is not being evaluated in this certification except for collocation compliance.

MURS Radio specifications, Fundamental frequency: 151.82 MHz  
Rated Maximum Output Power: +20 dBm  
Measured Output Power (ERP): +11.56 dBm  
Modulation type: GFSK  
Data Rate: 3.6 kbps  
Frequency Deviation: 1428 Hz

### **1.2 Related Submittal(s)/Grant(s)**

The EUT is subject to the following authorizations:

- a) Certification as a 151.82 MHz, MURS transmitter per FCC Part 2, Subpart J and Part 95, Subpart J, MURS and Subpart E, Technical Requirements.
- b) Verification under 15.101 as a digital device and receiver.

### **1.3 Test Methodology**

These measurements were conducted in accordance with the requirements of Title 47 CFR Part 95, Subpart E and TIA-603-E (2016). All measurements are in terms of peak values unless stated otherwise. The measurement system video bandwidth was set to at least three times that of the resolution bandwidth to prevent the introduction of amplitude smoothing throughout the evaluation process. If interconnecting cables are part of the measurement setup, then they were manipulated as necessary to maximize emissions. A block diagram of the tested system is shown in Figure 1.

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## **1.4 Test Facility**

Testing was performed at US Tech's measurement facility at 3505 Francis Circle, Alpharetta, GA, 30004. This site has been fully described and registered with the FCC under registration number US5301. Additionally, this site has also been fully described and submitted to Industry Canada (IC), and has been approved under file number 9900A-1. US Tech is an accredited laboratory under the National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code: 200162-0.

The shielded semi anechoic EMC Chamber and the conducted disturbance measurement facilities used to collect the radiated and conducted emissions data are located at 3505 Francis Circle, Alpharetta, GA (USA). These test sites meet the requirements given in ANSI C63.4:2014.

### **1.4.1 Radiated Emissions Test Site (Shielded Semi Anechoic EMC Chamber)**

The radiated emissions disturbance measurement facility consists of an 8.5 m long by 5.5 m wide and 5.6 m high shielded semi anechoic EMC Chamber. The chamber is lined with ferrite core and RF absorbers. The quiet zone is 2.0 m.

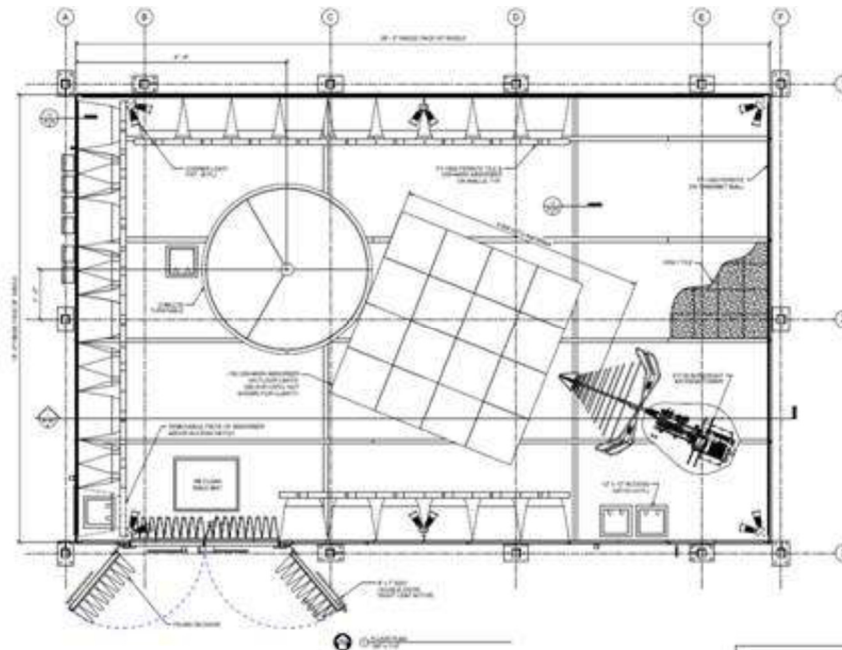
The test facility layout is shown in the figure below. A remotely controlled 2.0 m diameter flush-mounted turntable is provided for rotating (through at least 360 degrees) the EUT. A non-conductive table, 1.5 m long by 1.0 m wide by 0.8 m high is used in conjunction with the turntable for tabletop equipment. Electrical service for the EUT is provided through openings at the center of the turntable.

Provision for receiving antenna power and data wires is provided by junction boxes placed at the perimeter of the chamber. The receive antenna mast is remotely controlled and can be varied in height from 1 m to 4 m.

Power and data cables for the radiated disturbance measurement facility are run through PVC tubing under the raised floor or are laid directly upon the ground plane.

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**Figure 1. Radiated Emissions Disturbance Measurement Facility Diagram**



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## 1.5 Test Equipment

Table 1 describes test equipment used to evaluate this product.

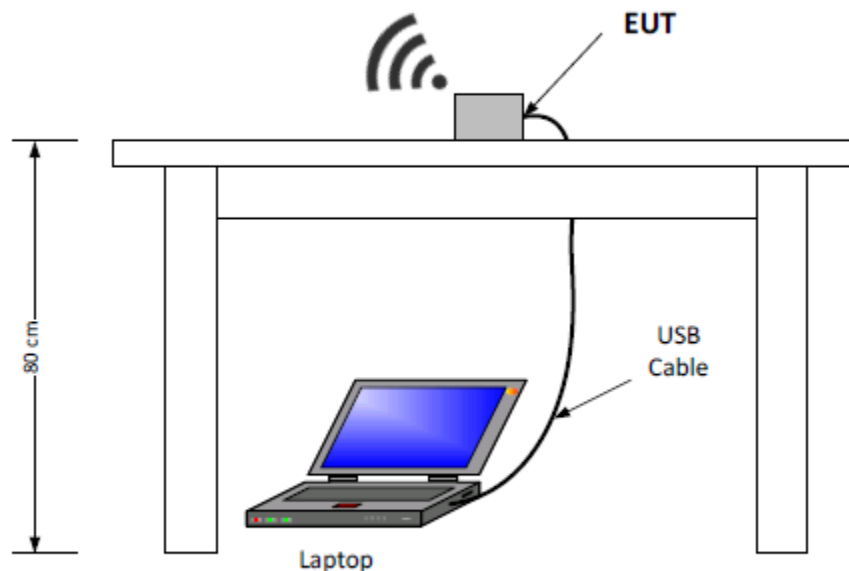
**Table 1. Test Instruments**

INSTRUMENT TYPE	MANUFACTURER	MODEL	SERIAL NUMBER	CALIBRATION DUE DATE
Spectrum Analyzer	Hewlett-Packard	8593E	3205A00124	2/28/2024 2 yr.
RF Preamp	Hewlett-Packard	8449B	3008A00914	3/3/2024
RF Preamp	Hewlett-Packard	8447D	1937A02980	6/9/2023
Loop Antenna	ETS Lindgren	6502	9810-3246	12/7/2024 2 yr.
Biconical Antenna	EMCO	3110B	9306-1708	8/17/2023 2 yr.
Biconical Antenna	EMCO	3110B	9307-1431	1/13/2025 2 yr.
Log Periodic Antenna	EMCO	3146	9305-3600	6/3/2023 2 yr.
Log Periodic Antenna	EMCO	3146	9110-3236	12/13/2023 2 yr.
Horn Antenna	A. H. Systems	SAS-571	605	4/28/2024 2 yr.
Horn Antenna	EMCO	3115	9107-3723	3/13/2025 2 yr.
Environmental Chamber	Thermotron	SM16	17095	4/17/2025 2 yr.
LISN (x2)	Solar Electronics	8028-50-TS24-BNC	955824 & 955825	4/28/2024
Spectrum Analyzer	Rigol	DSA815	DSA8A180300138	1/6/2024 2 yr.
Signal Generator	Rhode & Schwarz	SMT06	831285/010	8/18/2023

Note: The calibration interval of the above test instruments is 12 months unless stated otherwise and all calibrations are traceable to NIST/USA.

## 1.6 Modifications to EUT

No modifications were necessary to bring the EUT into compliance with FCC Part 95.



**Figure 2. Test Configuration Block Diagram**

Note 1: Laptop is only used to program radio to continuously transmit. It is not required for normal operation.

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**Table 2. EUT and Peripherals**

PERIPHERAL MANUFACTURER	MODEL NUMBER	SERIAL NUMBER	FCC/ IC ID:	CABLES P/D
Radio Systems Corporation (EUT)	RFA-621	V131205001253	FCC ID: KE3-30035901 Contains FCC ID: 2AC7Z-ESP32WROVERE IC: 21098-ESPWROVERE	P/D
Salom AC/DC Adaptor	SSW-2725U	22063N	N/A	P
Lenovo Laptop	82C6	PF2FRG6z	N/A	P/D

P = Power; D = Data U = Unshielded

**Table 3. Antennas**

REPORT REFERENCE	MANUFACTURER	TYPE OF ANTENNA	PART NUMBER	GAIN dB <sub>i</sub>	TYPE OF CONNECTOR
Antenna	Radio Systems Corp	Loop	100-1130	-1.0	SMA

## **2 Output Power**

### **2.1 Maximum Transmitter Power (FCC 2.1046 & 95.2767)**

On the test site, the EUT was placed on top of a non-conductive table, 80 cm above the floor for measurements below 1 GHz and 150 cm above the floor for measurements > 1 GHz. The EUT was also evaluated in three orthogonal positions to determine the worst-case position. The front of the EUT faced the measurement antenna located 3 meters away. Each signal measured was maximized by raising and lowering the receive antenna between 1 and 4 meters in height while monitoring the ever-changing spectrum analyzer display (with channel A in the Clear-Write mode and channel B in the Max-Hold mode) for the largest signal visible. That exact antenna height where the signal was maximized was recorded for reproducibility purposes. Also, the EUT was rotated about its Z-axis while monitoring the Spectrum Analyzer display for maximum. The EUT azimuth was recorded for reproducibility purposes. The EUT was measured when both maxima were simultaneously satisfied.

The maximum power was measured using the radiated method. The EUT was setup to transmit a continuous signal with >98% duty cycle. The receiver and video bandwidth on the spectrum analyzer was maximized and the span was sufficiently large enough to capture the peak emissions. The peak measurement of the signal was recorded.

#### **2.1.1 Maximum Power Allowed**

The maximum power allowed is 2 Watts (or 33 dBm) per FCC 95.2767.

#### **2.1.2 Measured Fundamental Signal**

The maximum output power of the EUT as measured below is 0.01432 W.

11.56 dBm into 50 ohm measurement system = 14.32 mW << 2 Watts  
Antenna gain = -1 dBi

$EIRP = 11.56 - 1 = 10.56 \text{ dBm} = 0.0113 \text{ W} \ll 2 \text{ Watts}$

The EUT was determined to comply with the Maximum Allowed Power.

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**Table 4. Maximum Output Power**

Frequency MHz	Maximum RX Reading (Units A)	Recreated Reading During Substitution (Using Same Units A) - Ideally 0	Difference Column A - B	TX Gain (dBi)	TX Gain Relative to Dipole (dBd)	RF Power into TX antenna (dB)	RF Power into substitution TX antenna corrected by TX Gain Relative to Dipole and TX Cable (dBm) ERP	Limit (dBm) ERP	Margin Below Limit (dB)
151.82	100.38	100.37	0.01	1.7	-0.44	13	11.56	33	21.44

Sample Calculation at 151.82 MHz:

SG Power into TX antenna	13.00 (dBm)
+ TX Gain	1.70 (dB)
+ Difference between recreated and actual	0.01 (dB)
+ TX Cable Loss	-0.44 (dB)
RF Power into TX Antenna	+11.56 (dBm)
Limit	33.00 (dBm)
RF Power Into TX Antenna	-11.56 (dBm)
Margin	21.44 (dBm)

Test Date: May 8, 2023

Tested By  
Signature:



Name: Gabriel Medina

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### 3 Emissions Bandwidth (Part 95.2773(a))

The EUT was modulated by its own internal sources. The Bandwidth of the Fundamental was measured using a spectrum analyzer, as shown below. A RBW that was > 1% of the authorized bandwidth was used to measure the EUT's bandwidth.

Using the Emission Bandwidth measurement technique of ANSI C63.10-2009 as a guide, the measurement of the Emission Bandwidth is found to be 4.10 kHz.

#### 3.1 Maximum Authorized Bandwidth

The maximum authorized Bandwidth per 95.2773 (a) = 11.25 kHz. The EUT was found to comply with the Maximum Authorized Bandwidth since 4.10 kHz < 11.25 kHz.

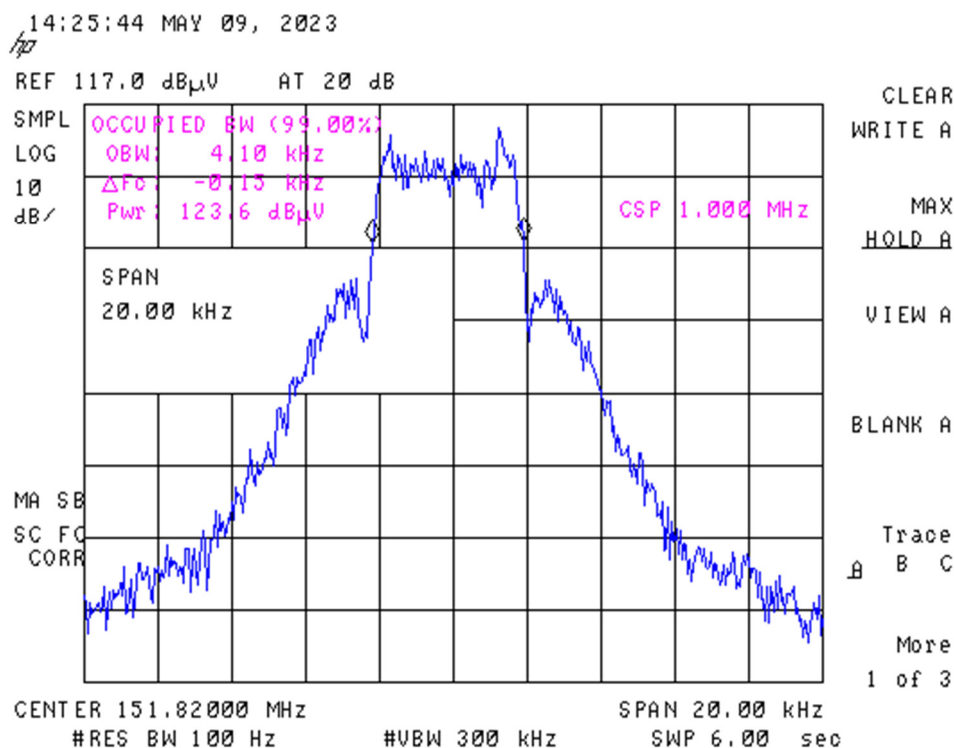


Figure 3. Bandwidth Measurement

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Tested By  
Signature:

*Gabriel Medina*

Name: Gabriel Medina

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#### **4 Unwanted Radiation Emissions (CFR 95.2779 (a)(b)(c))**

This requirement is from 47 CFR Part 2, Subpart J, Sections 1053 and 95.2779(b). The power of each unwanted emission shall be less than TP (Transmitter Power) as specified in paragraph 5.2 below.

##### **4.1 Test Method**

These emissions were measured on the Spectrum Analyzer via a short RF cable soldered to the RF output port of the transmitter circuit board.

##### **4.2 FCC Limits**

Per CFR Part 95.2779(b), the power of unwanted emissions must be attenuated below the transmitter output power in Watts (P) by at least:

- (1)  $7.27(f_d - 2.88 \text{ kHz})$  dB on any frequency removed from the channel center frequency by a displacement frequency ( $f_d$  in kHz) that is more than 5.625 kHz, but not more than 12.5 kHz.
- (2)  $50 + 10 \log(P)$  dB or 70 dB, whichever is the lesser attenuation, on any frequency removed from the channel center frequency by more than 12.5 kHz.

##### **4.3 Test Results**

The EUT is designed to operate at 151.8200 MHz and is assumed not to be using any audio low pass filter circuits, therefore only Emissions Mask 1 was applied.

The measured emissions comply with the specified mask as shown below.

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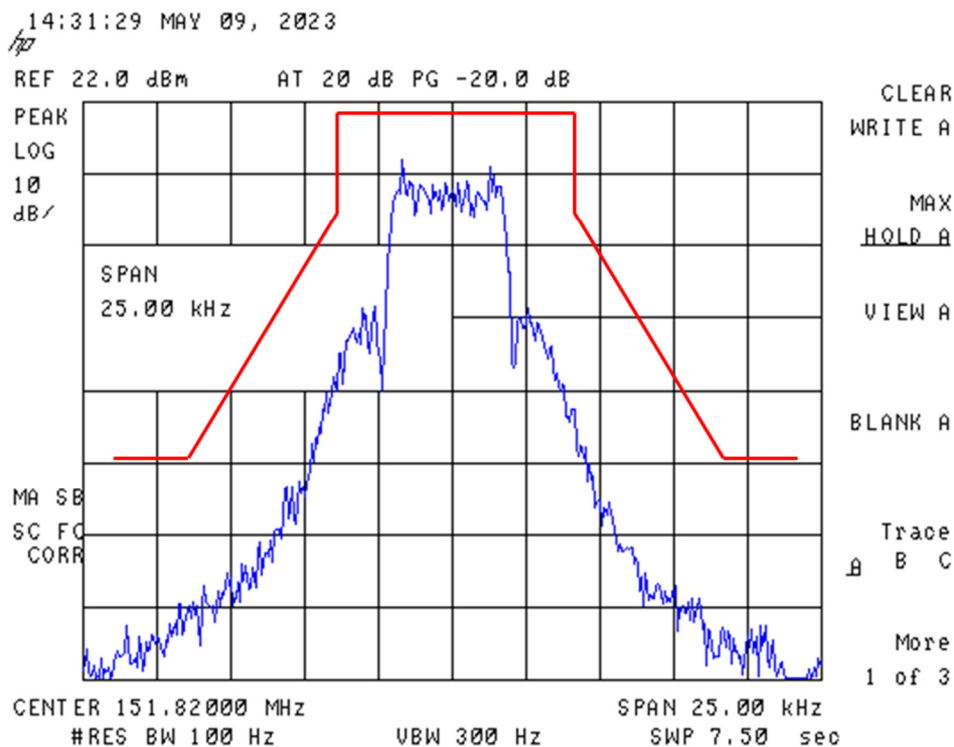


Figure 4. Emissions Mask 1

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Tested By  
Signature:

*Gabriel Medina*

Name: Gabriel Medina



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## **5 Field Strength of Spurious Radiation, (FCC 2.1051 & 95.2779(b)(2))**

### **5.1 Test Method**

Spurious emissions were evaluated by the substitution method from 30 MHz to 1.0 GHz at a EUT to antenna distance of 3 meters. The EUT was tested in the far field. Measurements for 30 to 1000 MHz were made with the analyzer's bandwidth set to 120 kHz. Measurements above 1000 MHz were made with analyzer's bandwidth set to 1 MHz and 3 MHz . Since the EUT is part of a portable handheld configuration, the EUT was rotated through the three orthogonal planes to produce the highest emissions relative to the limits. Results are shown in the Table below.

### **5.2 FCC Limits**

The limit is determined using the following information: On any frequency removed from the center of the authorized bandwidth by a displacement frequency ( $f_d$  in kHz) of more than 12.5 kHz, the limit will be at least  $50 + 10 \log (P)$  dB or 70 dB, whichever is the lesser attenuation.

Measured ERP Power= 0.01432 Watts = 11.56 dBm  
Attenuation Calculation =  $50 + 10\log(0.01432) = 31.56$   
Power Limit = 11.56 dBm – 31.56 dB = -20 dBm

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### 5.3 Test Results

**Table 5. Field Strength of Spurious Radiation**

Frequency MHz	Maximum RX Reading (Units A)	Recreated Reading During Substitution (Using Same Units A) - Ideally 0	Difference Column A - B	TX Cable Loss (dB)	TX Gain Relative to Dipole (dB)	RF Power into TX antenna (dBm) (SG Value- CL)	RF Power into substitution TX antenna (dBm)	Limit (dBm)	Margin Below Limit (dB)
50.70	44.48	45.12	-0.64	-6.2	-8.34	-62.5	-71.68	-20	51.68
75.22	55.53	55.89	-0.36	-0.8	-2.94	-53.4	-56.83	-20	36.83
88.72	47.38	48.25	-0.87	-0.5	-2.64	-60.0	-64.45	-20	44.45
142.20	46.43	46.16	0.27	1.3	-0.84	-64.5	-66.08	-20	46.08
346.30	46.43	46.80	-0.37	5.9	3.76	-65.0	-62.80	-20	42.80
369.00	43.88	43.97	-0.09	6.2	4.06	-68.5	-65.81	-20	45.81
All other emissions were 20 dB or greater below the applicable limit.									

Sample Calculation at 50.7 MHz:

SG Power Into TX Antenna	-62.5 (dBm)
+ TX Gain	-8.34 (dB)
+Difference between recreated and Actual	-0.64 (dB)
-TX Cable Loss	-6.20 (dB)
RF Power Into TX Antenna	-71.68 (dBm)
Limit	-20.00 (dBm)
RF Power into TX Antenna	-71.68 (dBm)
Margin	51.68 (dB)

Test Date: May 8, 2023

Tested By  
 Signature: 

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## **6 Frequency Stability (CFR 2.1055, 95.2765(a)(b))**

### **6.1 Test Method**

The EUT was tested in the Thermotron Environmental Chamber. The humidity was tested to a relative value of no more than 50%. The temperature was varied between -30°C to +50°C in 10° increments. All measurements were referenced back to the frequency measured at +20°C. At each set point the temperature was allowed to stabilize for no less than 30 minutes before measurements were recorded and the temperature changed.

### **6.2 FCC Limits**

Per CFR 95.2765 (a)(b) MURS transmitters must maintain a frequency stability of 5.0 ppm, or 2.0 ppm if designed to operate with a 6.25 kHz bandwidth. Since this EUT was measured to have a bandwidth of 4.10 the limit applied was 5.0 ppm.

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### 6.3 Test Results

**Table 6. Frequency Deviation/Stability**

Temperature (°C)	Measured Frequency (MHz)	Allocated Frequency (MHz)	Deviation (ppm)	Limit (ppm)
-30	151.81830	151.81843	0.9	5.00
-20	151.81830	151.81843	0.9	5.00
-10	151.81838	151.81843	0.3	5.00
0	151.81833	151.81843	0.7	5.00
10	151.81833	151.81843	0.7	5.00
20 (low voltage)	151.81843	151.81843	0.0	5.00
20 (Nominal voltage)	151.81843	151.81843	0.0	5.00
20 (High voltage)	151.81838	151.81843	0.3	5.00
30	151.81838	151.81843	0.3	5.00
40	151.81843	151.81843	0.0	5.00
50	151.81838	151.81843	0.3	5.00

**Actual TX Frequency was: 151.81843 MHz**

Sample Calculation at -30°C

$$\text{Deviation} = \frac{|(151.81830 - 151.81843)|}{151.81843} = 0.00000090 = 0.90 \text{ ppm} < 5\text{ppm}$$

Test Date: May 9, 2023

Tested By  
Signature: 

Name: Gabriel Medina