

*Testing Tomorrow's Technology*

**Application**

**For**

**Title 47 USC Part 2, Subpart J, Paragraph 2.907 Equipment Authorization of  
Certification for an Intentional Radiator per Part 15, Subpart C,  
Paragraphs 15.207 and 15.209**

**And**

**Industry Canada, Radio Standards Specifications:  
RSS Gen Issue 4 and RSS-210 Issue 9**

**For the**

**Radio Systems**

**Model: ICT 801**

**FCC ID: KE3-300996**

**IC: 2721A-300996**

**UST Project: 18-0161**

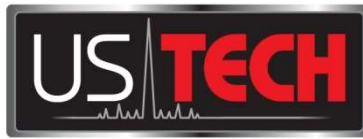
**Issue Date: June 30, 2018**

Total Pages in This Report: 22

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I certify that I am authorized to sign for the Test Agency 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: Alan Ghasiani

Name: Alan Ghasiani

Title: Compliance Engineer – President

Date: June 30, 2018



TESTING  
NVLAP LAB CODE 200162-0

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## MEASUREMENT TECHNICAL REPORT

**COMPANY NAME:** Radio Systems

**MODEL:** ICT 801

**FCC ID:** KE3-300996

**IC:** 2721A-300996

**DATE:** June 30, 2018

This report concerns (check one): Class II Change ☒

Equipment type: 7.5 kHz or 10.7 kHz Transmitter Module

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? yes \_\_\_\_\_ No X

If yes, defer until: N/A  
date

agrees to notify the Commission by N/A  
date

of the intended date of announcement of the product so that the grant can be issued on that date.

Report prepared by:

US Tech  
3505 Francis Circle  
Alpharetta, GA30004

Phone Number: (770) 740-0717  
Fax Number: (770) 740-1508

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### **List of Attachments**

FCC Agency Agreement  
IC Agency Agreement  
Canadian Representative Letter  
Application Forms  
Letter of Confidentiality  
Test Configuration Photographs  
Theory of Operation  
Permissive Change Letter  
FCC to IC Cross Reference

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## **1 General Information**

### **1.1 Purpose of this Report**

The purpose of this report is to file for a Class II permissive change for the following reasons:

The ICT-801 has been updated to include a second mode of operation. The only difference between the original product and the updated product is the modulation scheme. No hardware changes are required for this new mode of operation. The 7.5 K and 10.7 K transmit frequencies stayed the same. Instead of the OOK modulation that transmits a digital code to the collar that would generally cause activation, this model generates a signal that prevents the collar from activating. The masking signal is about 50% duty cycle and 120Hz. The change is implemented with a firmware update. No changes were made to the transmitter circuitry.

### **1.2 Characterization of Test Sample**

The sample used for testing was received by US Tech on June 6, 2018 in good operating condition.

### **1.3 Product Description**

The Equipment Under Test (EUT) is the Radio Systems Model ICT 801. The EUT is a pet containment signal loop transmitter. The product is designed to transmit a low frequency signal around the perimeter of the customer's property utilizing a continuous loop of wire. The output driver is a constant current design, which is controlled by the position of the field width adjustment potentiometer. Voltage and current feedback allows for loop continuity testing by software.

Frequency: 7.5 kHz or 10.7 kHz  
Modulation: digital code

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## **1.4 Configuration of Tested System**

The Test Sample was tested per *ANSI C63.4:2009 and ANSI C63.4:2013, Methods of Measurement of Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz (2009)* for FCC subpart A Digital equipment Verification requirements and per *ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices* for FCC subpart C Intentional Radiators.

A list of EUT and Peripherals is found in Table 1 below. A block diagram of the tested system is shown in Figure 1. Test configuration photographs are provided in separate Appendices.

## **1.5 Test Facility**

Testing was performed at US Tech's measurement facility at 3505 Francis Circle, Alpharetta, GA30004. This site has been fully described and registered with the FCC. Its designation number is 186022. Additionally this site has also been fully described and submitted to Industry Canada (IC), and has been approved under file number 9900A-1.

## **1.6 Related Submittals**

The EUT is subject to the following FCC authorizations:

- a) Certification under section 15.207 and 15.209 as a transmitter.
- b) Verification under 15.101 as a digital device.

The Verification requirement shares many common report elements with the Certification report. Therefore, though this report is mostly intended to provide data for the Certification process, the Verification authorization report (Parts 15.107 and 15.109) for the EUT is included herein.

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**Table 1. EUT and Peripherals**

<b>EUT and MANUFACTURER</b>	<b>MODEL NUMBER</b>	<b>SERIAL NUMBER</b>	<b>FCC/IC ID</b>	<b>CABLES P/D</b>
Pet Containment System Radio Systems Corp (EUT)	ITC 801	Engineering Sample	FCC: KE3-300996 IC: 2721A-300996	(None)
<b>PERIPHERAL and MANUFACTURER</b>	<b>MODEL NUMBER</b>	<b>SERIAL NUMBER</b>	<b>FCC/IC ID</b>	<b>CABLES P/D</b>
Power Adapter Radio Systems Corp. (Peripheral)	KSASB024190 0100HU	Engineering Sample	(None)	1.8 m U P
Sealed Rechargeable Battery Power Sonic (Peripheral)	PS-1212	(None)	(None)	0.8 m U P

**U= Unshielded S= Shielded P= Power D= Data**



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## 2 Tests and Measurements

### 2.1 Test Equipment

The table below lists test equipment used to evaluate this product. Model numbers, serial numbers and their calibration status are indicated.

**Table 2. Test Instruments**

TEST INSTRUMENT	MODEL NUMBER	MANUFACTURER	SERIAL NUMBER	CALIBRATION DUE DATE
SPECTRUM ANALYZER (USED ONLY FOR RADIATED EMISSIONS TESTING)	E4407B	Agilent	US41442935	6/22/2018
SPECTRUM ANALYZER (USED ONLY FOR CONDUCTED EMISSIONS TESTING)	DSA815	RIGOL	DSA8A18030 0138	10/11/2019 2 yr
PREAMP	8447D	HEWLETT-PACKARD	1937A02980	3/7/2019
LOOP ANTENNA	6502	ETS Lindgren	9810-3246	1/22/2020 2 yr
BICONICAL ANTENNA	3110B	EMCO	9306-1708	5/2/2019 2 yr
LOG PERIODIC ANTENNA	3146	EMCO	9305-3600	9/21/2018 2 yr
LISN x 2	9247-50-TS-50-N	Solar Electronics	955824 & 955826	3/9/2019

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

## 2.2 Modifications to EUT Hardware

No physical modifications were made by US Tech in order to bring the EUT into compliance with FCC Part 15, Subpart C Intentional Radiator Limits for the transmitter portion of the EUT or the Subpart B Unintentional Radiator Limits (Receiver and Digital Device) Requirements.

## 2.3 Number of Measurements for Intentional Radiators (15.31(m))

Measurements of intentional radiators or receivers shall be performed and reported for each band in which the device can be operated with the device operating at the number of frequencies in each band specified in Table 3 below.

**Table 3. Number of Test Frequencies for Intentional Radiators**

FrequencyRange over which the device operates	Number ofFrequencies	Location in the Range of operation
1 MHz or less	1	Middle
1 to 10 MHz	2	1 near the top 1 near the bottom
Greater than 10 MHz	3	1 near top 1 near middle 1 near bottom

Because the EUT operates at 7.5 kHz or 10.7 kHz, 1 test frequency was used.

## 2.4 Frequency Range of Radiated Measurements (Part 15.33)

### 2.4.1 Intentional Radiator

The spectrum shall be investigated for the intentional radiator from the lowest RF signal generated in the EUT, without going below 9 kHz to the 10<sup>th</sup> harmonic of the highest fundamental frequency generated or 40 GHz, whichever is the lowest.

## **2.4.2 Unintentional Radiator**

For the digital device, an unintentional radiator, the frequency range shall be 30 MHz to 1000 MHz, or to 5 times the highest internal clock frequency.

## **2.5 Measurement Detector Function and Bandwidth (CFR 15.35)**

The radiated and conducted emissions limits shown herein are based on the parameters outlined following.

### **2.5.1 Detector Function and Associated Bandwidth**

On frequencies below 1000 MHz, the limits herein are based upon measurement equipment employing a CISPR Quasi-peak detector function and related measurement bandwidths (i.e. 9 kHz from 150 kHz to 30 MHz and 120 kHz from 30 MHz to 1000 MHz). Alternatively, measurements may be made with equipment employing a peak detector function as long as the same bandwidths specified for the quasi-peak device are used.

### **2.5.2 Corresponding Peak and Average Requirements**

Above 1000 MHz, radiated limits are based on measuring instrumentation employing an average detector function. When average radiated emissions are specified there is also a corresponding Peak requirement, as measured using a peak detector, of 20 dB greater than the average limit. For all measurements above 1000 MHz the Resolution Bandwidth shall be at least 1 MHz.

### **2.5.3 Pulsed Transmitter Averaging**

When the radiated emissions limit is expressed as an average value, and the transmitter is pulsed, the measured field strength shall be determined by applying a Duty Cycle Correction Factor based upon dividing the total ON time during the first 100 ms period by 100 ms (or by the period if less than 100 ms). The duty cycle may be expressed logarithmically in dB.

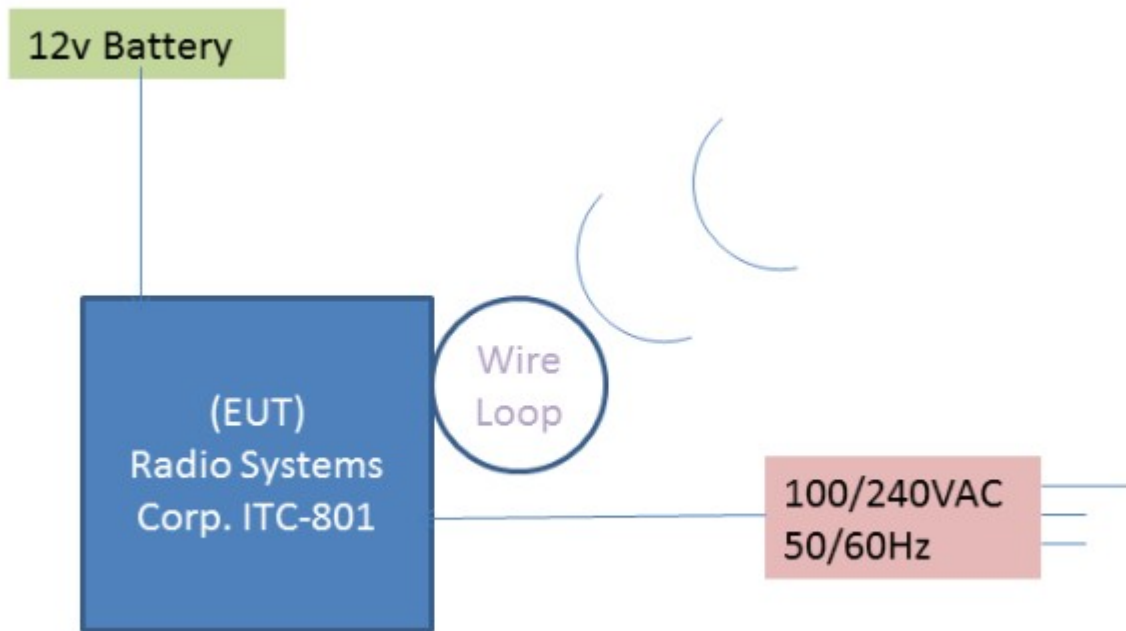
NOTE: If the transmitter was programmed to transmit at >98% duty cycle, then, wherever applicable (where the detection mode was AVG), the duty cycle factor calculated will be applied.

## 2.6 EUT Antenna Requirements (CFR 15.203)

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. Only the antenna(s) listed in Table 4 will be used with this module.

**Table 4. Allowed Antenna(s)**

REPORT REFERENCE	MANUFACTURER	TYPE OF ANTENNA	MODEL	GAIN dBi	TYPE OF CONNECTOR
Antenna 1	Radio Systems	Integral Loop Antenna	Engineering Sample	--	Integral Loop Antenna



**Figure 1. Block Diagram of Test Configuration**

## **2.7 Restricted Bands of Operation (Part 15.205)**

Only spurious emissions can fall in the frequency bands of CFR 15.205. The field strength of these spurious emissions cannot exceed the limits of 15.209. Radiated Harmonics and other Spurious Emissions are examined for this requirement; see paragraph 2.1.

## **2.8 Intentional Radiator, Power Line Conducted Emissions (CFR 15.207)**

The EUT is battery-powered and includes an AC powered battery charger; 100/240 V and 50/60 Hz. Power line conducted emissions testing was performed to ensure that with the EUT in operation (exercising all transmitter functions), the complete system continues to meet the applicable requirements for CFR 15.207. These measurements were completed while the EUT was connected to the battery charger and transmitting while charging. Results are displayed along with the 15.107 power line test data in the sections below.

## **2.9 Intentional Radiator, Radiated Emissions (CFR 15.209, (IC RSS 210))**

Radiated Radio measurements: the EUT was placed into a continuous transmit mode of operation and a preliminary scan was performed on the EUT to find signal frequencies that were caused by the transmitter part of the product. To obtain the worst case results, the EUT was placed on a table top of a non-conductive table, 80 cm above the ground floor. The EUT was positioned 3 meters away from the receiving antenna during testing (1 meter at frequencies above 6 GHz and if the emissions were less than 6 dB from the noise floor). The EUT was tested in X, Y and Z axes or the position of normal operation to determine the worst case orientation. Radiated measurements below 30 MHz were tested with a RBW = 9 kHz; emissions below 1 GHz were tested with a RBW = 120 kHz and radiated measurements above 1 GHz were measured using a RBW = 1 MHz. VBW was set to three times the RBW value.

The test data is detailed below for this section. For radiated emissions, any emission that was greater than 20 dB from the applicable limit was not recorded. If radiated emissions above 1 GHz were measured at a distance of 1 meter, the measured value at 1 meter was extrapolated to the results at 3 meters using an inverse distance extrapolation factor of -20 dB/decade. There were no test failures.

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**Table 5. Intentional Radiated Emissions 9 kHz to 30 MHz**

Test: FCC Part 15, Para 15.209				Client: Radio Systems			
Project: 18-0161				Model: ICT 801			
Frequency (MHz)	Test Data (dBuV)	AF+CA-AMP (dB/m)	Results (dBuV/m)	Limits (dBuV/m)	Antenna Distance/ Polarization	Margin (dB)	Detector Mode
0.0107	72.15	15.60	87.75	127.0	3 meters	39.3	PK
All other detected emissions were 20 dB or more below the applicable limit.							

1. (\*) Falls within the restricted bands of CFR 15.205. Limits based on CFR15.209 & 20 dB relaxation for peak measurements of CFR 15.35.
2. No other signals detected within 20 dB of specification limit. Harmonics investigated up to the 10<sup>th</sup> harmonic

Sample Calculations: at 0.0107 MHz, 72.15 dBuV + (15.60)= 87.85 dBuV/m  
Limit @ 3m= 127.0 dBuV/m  
Margin= 20.2 dB

Test Date: June 15, 2018

Tested By

Signature: Afzal Fazal

Name: Afzal Fazal

**NOTE: Measurements above 30 MHz are presented in Table 9.**

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## 2.10 99% Occupied Bandwidth (IC RSS 210, A8.1)

These measurements were performed while the EUT was in a constant transmit mode. A method similar to the marker delta method was used to capture the points. The RBW was set to approximately 1/100 of the manufacturers claimed RBW and with the VBW  $\geq$  RBW. The results of this test are given in Table 7 and Figure 2.

**Table 6. 20 dB Bandwidth and 99% Occupied Bandwidth**

Frequency (kHz)	20 dB Bandwidth (kHz)	99% Occupied Bandwidth (kHz)
10.7	0.702	0.726

Test Date: June 16-18, 2018

Tested By

Signature: 

Name: Afzal Fazal

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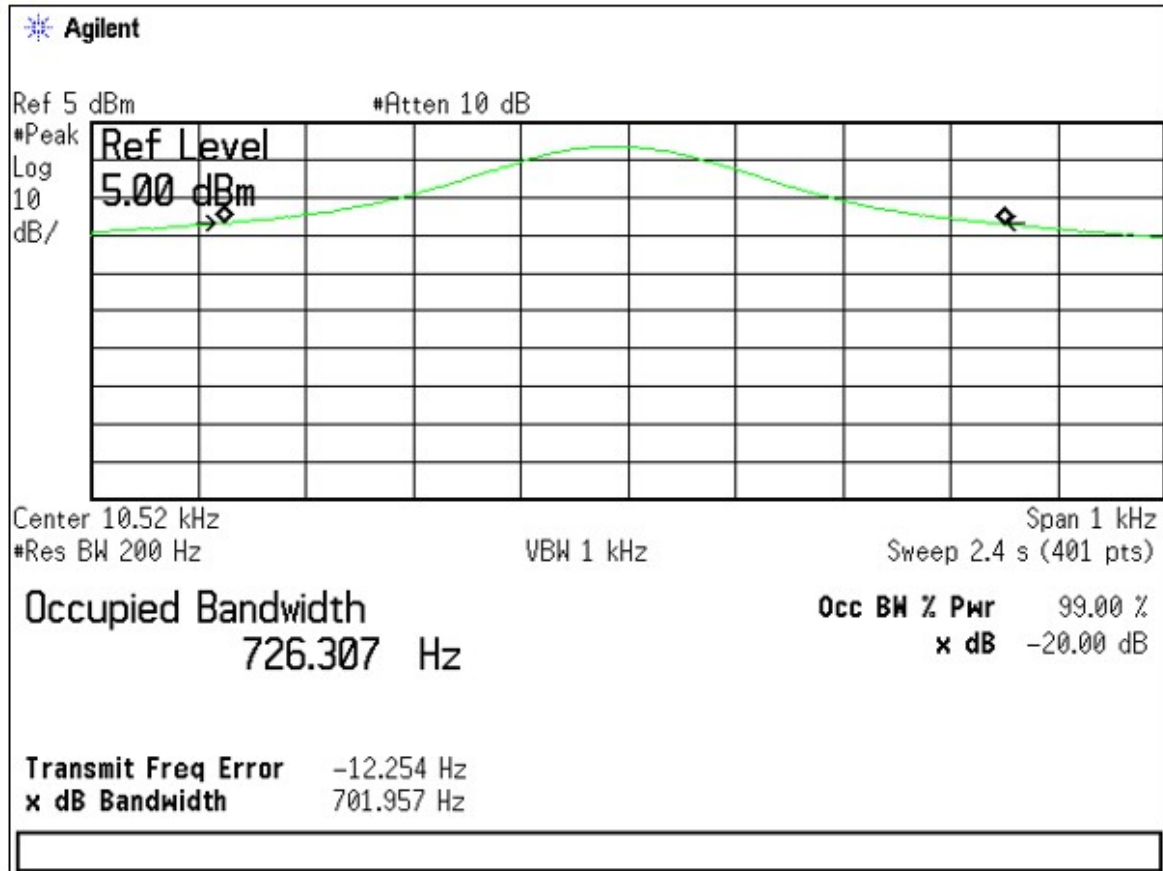


Figure 2. 20 dB & 99% Bandwidth



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## **2.11 Unintentional/Intentional Radiator, Power line Emissions (CFR 15.107 and 15.207)**

The power line conducted voltage emissions measurements have been carried out in accordance with CFR 15.107, per ANSI C63.4:2009 and ANSI C63.4:2013, Paragraph 7, with a spectrum analyzer connected to a LISN and the EUT placed into a continuous mode of transmission.

The worst-case results for conducted emissions were determined to be produced when the EUT was operating under continuous transmission. The worst case measurement occurred on the Phase line at 0.1733 MHz. The emission level was 7.5 dB from the applicable limit. All other emissions were at least 8.7 dB from the limit. Those results are given in the table following.

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**Table 7. Transmitter Power Line Conducted Emissions Test Data, (15.107 and 15.207)**

150 kHz to 30 MHz with Class B Limits						
Test: Power Line Conducted Emissions				Client: Radio Systems		
Project: 18-161				Model: ICT 801		
Frequency (MHz)	Test Data (dBuV)	LISN+CL-PA (dB)	Results (dBuV)	AVG Limits (dBuV)	Margin (dB)	Detector PK, QP, or AVG
120 VAC, 60 Hz Phase						
0.1733	46.89	0.40	47.29	54.8	7.5	PK
0.6092	36.62	0.14	36.76	46.0	9.2	PK
1.7930	34.45	0.16	34.61	46.0	11.4	PK
5.9670	29.07	0.26	29.33	50.0	20.7	PK
10.9500	25.89	0.44	26.33	50.0	23.7	PK
23.2160	25.66	0.72	26.38	50.0	23.6	PK
120VAC, 60 Hz Neutral						
0.1675	45.84	0.54	46.38	55.1	8.7	PK
0.5792	30.78	0.29	31.07	46.0	14.9	PK
1.6000	30.03	0.30	30.33	46.0	15.7	PK
6.4330	28.06	0.43	28.49	50.0	21.5	PK
11.0500	25.98	0.56	26.54	50.0	23.5	PK
20.7660	25.28	0.74	26.02	50.0	24.0	PK

Note: (\*) denotes QP Limit used.

SAMPLE CALCULATION at 0.1733 MHz:

Magnitude of Measured Frequency	46.89	dBuV
+ Cable Loss+ LISN Loss	0.40	dB
=Corrected Result	47.29	dBuV
Limit	54.80	dBuV
-Corrected Result	47.29	dBuV
Margin	7.50	dB

Test Date: June 26, 2018

Tested By  
 Signature: 

Name: Afzal Fazal

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## **2.12 Unintentional/Intentional Radiator, Radiated Emissions (CFR 15.109 and 15.209)**

Radiated emissions disturbance Measurements were performed with EUT in constant transmit mode and using an instrument having both peak and quasi-peak detectors over the frequency range of 9 kHz to 1 GHz. Measurements of the radiated emissions were made with the receiver antenna at a distance of 3m from the boundary of the test unit.

The test antenna was varied from 1 m to 4 m in height while watching the analyzers' display for the maximum magnitude of the signal at the test frequency. The antenna polarization (horizontal or vertical) and test sample azimuth were varied during the measurements to find the maximum field strength readings to record.

The worst-case radiated emission in the range of 9 kHz to 1 GHz was 6.0 dB below the limit at 708.90 MHz. This signal is found in Table 9. All other radiated emissions were 8.3 dB or more below the limit.

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**Table 8. Unintentional Radiated Emissions 9 kHz to 30 MHz**

Test: FCC Part 15, Para 15.209				Client: Radio Systems			
Project: 18-0161				Model: ICT 801			
Frequency (MHz)	Test Data (dBuV)	AF+CA-AMP (dB/m)	Results (dBuV/m)	Limits (dBuV/m)	Antenna Distance/ Polarization	Margin (dB)	Detector Mode
1.85	26.41	11.77	38.18	82.0	3 meter	43.8	PK
All other detected emissions were 20 dB or more below the applicable limit.							

1. (\*) Falls within the restricted bands of CFR 15.205. Limits based on CFR15.209 & 20 dB relaxation for peak measurements of CFR 15.35.
2. No other signals detected within 20 dB of specification limit. Harmonics investigated up to the 10<sup>th</sup> harmonic

Sample Calculations: at 1.85 MHz, 26.41 dBuV + (11.77) = 82.0 dBuV/m

Limit @ 3m= 82.0 dBuV/m

Margin= 43.8 dB

Test Date: June 15, 2018

Tested By

Signature: Afzal Fazal

Name: Afzal Fazal

**NOTE: Measurements above 30 MHz are presented in Table 9.**

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**Table 9. Unintentional Radiator, Peak Radiated Emissions (CFR 15.109, 15.209), 30 MHz to 1000 MHz**

30 MHz to 1000 MHz with Class B Limits							
Test: Radiated Emissions				Client: Radio Systems			
Project: 18-0161				Model: ICT 801			
Frequency (MHz)	Test Data (dBuV)	AF+CA-AMP (dB/m)	Results (dBuV/m)	QP Limits (dBuV/m)	Antenna Distance/ Polarization	Margin (dB)	Detector PK, or QP
89.93	52.26	-17.02	35.24	43.5	3m./HORZ	8.3	PK
92.48	47.83	-16.11	31.72	43.5	3m./VERT	11.8	PK
201.04	32.66	-13.69	18.97	43.5	3m./HORZ	24.5	PK
212.14	30.78	-14.02	16.76	43.5	3m./VERT	26.7	PK
249.48	30.44	-13.49	16.95	46.0	3m./VERT	29.1	PK
708.90	42.63	-2.64	39.99	46.0	3m./HORZ	6.0	PK
966.20	28.56	-0.50	28.06	54.0	3m./VERT	25.9	PK
972.50	28.29	0.55	28.84	54.0	3m./HORZ	25.2	PK

Tested from 30 MHz to 1 GHz

SAMPLE CALCULATION at 89.93MHz:

Magnitude of Measured Frequency	52.26	dBuV
+ Cable Loss+ LISN Loss	-17.02	dB
=Corrected Result	35.24	dBuV
Limit	43.50	dBuV
-Corrected Result	35.24	dBuV
Margin	8.30	dB

Test Date: June 16, 2018

Tested By  
 Signature: 

Name: Afzal Fazal

US Tech Test Report  
FCC ID:  
IC:  
Test Report Number:  
Issue date:  
Customer:  
Model:

FCC Part 15 & RSS-GEN Certification  
KE3-300996  
2721A-300996  
18-0161  
June 30, 2018  
Radio Systems Corporation  
ICT 801

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## **2.13 Measurement Uncertainty**

The measurement uncertainties given were calculated using the method detailed in CISPR 16-4. A coverage factor of  $k=2$  was used to give a level of confidence of approximately 95%.

### **2.13.1 Conducted Emissions Measurement Uncertainty**

Measurement Uncertainty (within a 95% confidence level) for this test is  $\pm 2.78\text{dB}$ .

The data listed in this test report does have sufficient margin to negate the effects of uncertainty. Therefore, the EUT unconditionally meets this requirement.

### **2.13.2 Radiated Emissions Measurement Uncertainty**

For a measurement distance of 3 m the measurement uncertainty (with a 95% confidence level) for this test using a Biconical Antenna (30 MHz to 200 MHz) is  $\pm 5.39\text{dB}$ . This value includes all elements of measurement.

The measurement uncertainty (with a 95% confidence level) for this test using a Log Periodic Antenna (200 MHz to 1000 MHz) is  $\pm 5.18\text{dB}$ .

The data listed in this test report does have sufficient margin to negate the effects of uncertainty. Therefore, the EUT unconditionally meets this requirement.