FCC PART 15, SUBPART F
ISEDC RSS-220, ISSUE 1, JULY 2018

TEST REPORT

For

Tesla, Inc.

3500 Deer Creek Road, Palo Alto, CA 94304, USA

FCC ID: 2AEIM-1733130
IC: 20098-1733130

Report Type:	**Product Type:**
Original Report	Automotive Part

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Report Number: R2109306-519

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ACCREDITED
CERTIFICATE #3297.02

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2109306-519	Original Report	2021-10-28
1	R2109306-519	Updated 17065 Reviewer's comments	2021-11-12

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report was prepared on behalf of *Tesla, Inc* and their product model: 1733130, FCC ID: 2AEIM-1733130; IC: 20098-1733130 or the "EUT" as referred to in this report. It is an automotive part (Fascia Endpoint) with BLE radio, Ultra Wide-band (UWB) radio and UHF receiver.

This device is an update from model 1613851 (report number: R2009183-519) to 1733130. Please refer to the manufacturer declaration of similarity letter in Annex D of this report.

UWB Subclass as specified by RSS-220 §3.2: Hand-held Communication Devices.

The radio terminal has data port.

1.2 Mechanical Description of EUT

1733130 measures approximately 12.7 cm (Length), 6.35 cm (Width), and 1.91 cm (Height).

The data gathered are from a production sample provided by Tesla, Inc., serial number: ED321272000008.

1.3 Objective

This report was prepared on behalf of *Tesla, Inc.,* in accordance with Part 2, Subpart J, and Part 15, Subpart and F of the Federal Communication Commission's rules and ISEDC RSS-220 Issue 1, July 2018.

The objective was to determine compliance with FCC Part 15.519 and ISEDC RSS-220 rules for Peak Fundamental Emission, Antenna Requirements, UWB Bandwidth, Average Radiated Emissions, Radiated Spurious Emissions and Ceasing Transmission requirements.

Due to the similarities between 1733130 and 1613851, test results for 1613851 (report number: R2009183-519) were leveraged. 1733130 (EUT) was verified to show continuous compliance. Verification results were shown in this report.

1.4 Related Submittal(s)/Grant(s)

N/A

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 393761 D01 UWB FAQ v02: Ultra-Wideband (UWB) Devices Frequently Asked Questions.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 º C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R.

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- ***An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3297.01)*****,** in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide

range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.02)*** to certify

- For the USA (Federal Communications Commission):
  - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
  - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
  - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
  - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
  - 2 All Scope 2-Licensed Personal Mobile Radio Services;
  - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
  - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
  - 5 All Scope 5-Licensed Fixed Microwave Radio Services
  - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
  - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
  - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
  - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
  - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
  - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
  - 1 MIC Telecommunication Business Law (Terminal Equipment):
    - All Scope A1 - Terminal Equipment for the Purpose of Calls;
    - All Scope A2 - Other Terminal Equipment
  - 2 Radio Law (Radio Equipment):
    - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
    - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
    - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03)*** to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

1 Electronics and Office Equipment:
- for Telephony (ver. 3.0)
- for Audio/Video (ver. 3.0)
- for Battery Charging Systems (ver. 1.1)
- for Set-top Boxes & Cable Boxes (ver. 4.1)
- for Televisions (ver. 6.1)
- for Computers (ver. 6.0)

- for Displays (ver. 6.0)
- for Imaging Equipment (ver. 2.0)
- for Computer Servers (ver. 2.0)

2 Commercial Food Service Equipment
- for Commercial Dishwashers (ver. 2.0)
- for Commercial Ice Machines (ver. 2.0)
- for Commercial Ovens (ver. 2.1)
- for Commercial Refrigerators and Freezers

3 Lighting Products
- For Decorative Light Strings (ver. 1.5)
- For Luminaires (including sub-components) and Lamps (ver. 1.2)
- For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
- For Integral LED Lamps (ver. 1.4)

4 Heating, Ventilation, and AC Products
- for Residential Ceiling Fans (ver. 3.0)
- for Residential Ventilating Fans (ver. 3.2)

5 Other
- For Water Coolers (ver. 3.0)

D- ***A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:***

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
  - BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
  - ENERGY STAR Recognized Test Laboratory – US EPA
  - Telecommunications Certification Body (TCB) – US FCC;
  - Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

Python scripts were provided by Tesla, Inc., and was verified to be compliant with the standard requirements being tested against. The following channel frequencies were selected for testing. All the modes were measured for fundamental field strength, and the corresponding power settings used are listed below.

Radio	Frequency (MHz)	Mode	Power Setting
UWB	6489.6 MHz (Channel 5)	0	1.5
		4	0
		8	-0.5
		9	1
		13	0
		14	1
	6988.8 MHz (Channel 6)	0	1
		4	-0.75
		8	-1.25
		9	0.25
		13	-0.5
		14	0.5
	7987.2 MHz (Channel 9)	0	0.5
		4	-1.25
		8	-1.5
		9	0.25
		13	-0.75
		14	0.25

2.3 Equipment Modifications

None

2.4 Remote Support Equipment

Manufacturer	Description	Model	S/N
HP	Laptop	Zbook Studio G3	00329-00000-00003-AA284
PJRC	Teensy	Teensy-LC	M26M6VFT1N1SJCRFKCJ

2.5 Local Support Equipment

Manufacturer	Description	Model	S/N
Volteq	DC Power Supply	HY5003D	160402343

2.6 Interface Ports and Cabling

Cable Description	Length (m)	To	From
Power Cables	< 1 m	EUT	DC Power Supply
RF Cable	1 m	EUT	PSA
USB Type A to Micro USB Type B Cable	< 1 m	PC	Teensy
RS-232 Cable	< 1 m	Teensy	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC and ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirement	Compliant[1]
FCC §15.207 ISEDC RSS-Gen §8.8	AC Line Conducted Emissions	N/A[2]
FCC §2.1091, §1.1310(d) (3) ISEDC RSS-102	RF Exposure	Compliant[1]
FCC §2.1053, §15.205, §15.209, §15.519(c) ISEDC RSS-220 §3.4, §5.3.1(c), ISEDC RSS-Gen §8.9 and §8.10	Radiated Spurious Emissions	Compliant[1]
FCC §15.503(d), §15.519(b) ISEDC RSS-220 §5.1(a) ISEDC RSS-Gen§6.7	Emission Bandwidth	Compliant[1]
FCC §15.519(e) ISEDC RSS-220 §5.3.1(g)	Peak Fundamental Emission	Compliant[3]
FCC §15.519(c), §15.519(d) ISEDC RSS-220 §5.3.1(d), §5.3.1(e)	Average Radiated Emissions	Compliant[3]
FCC §15.519(a)(1) ISEDC RSS-220 §5.3.1(b)	Cease Transmission	Compliant[1]

Note[1]: Compliance was based on test data from the similar model, which was reported in Report Number: R2009183-519 issued by BACL on 2020-12-21

Note[2]: Device is powered by car battery.

Note[3]: Mode 0 was tested for verification. All other modes' compliance was based on test data from the similar model, which was reported in Report Number: R2009183-519 issued by BACL on 2020-12-21

4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements

4.1 Applicable Standards

According to FCC §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. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For licence-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device's ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

External/Internal/Integral	Maximum Antenna Gain (dBi)	Antenna Type
Integral	5.41	Chip Antenna

Antenna gain is information provided by customer.

5 FCC §2.1091, §1.1310(d) (3) & ISEDC RSS-102 - RF Exposure

5.1 Applicable Standards

As per FCC §1.1310(d) (3), At operating frequencies above 6 GHz, the MPE limits listed in Table 1 in paragraph (e)(1) of this section shall be used in all cases to evaluate the environmental impact of human exposure to RF radiation as specified in §1.1307(b) of this part.

TABLE 1 TO §1.1310(E)(1)—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm^2)	Averaging time (minutes)
(i) Limits for Occupational/Controlled Exposure				
0.3-3.0	614	1.63	*(100)	≤6
3.0-30	1842/f	4.89/f	*($900/f^2$)	<6
30-300	61.4	0.163	1.0	<6
300-1,500			f/300	<6
1,500-100,000			5	<6
(ii) Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	<30
1.34-30	824/f	2.19/f	*($180/f^2$)	<30
30-300	27.5	0.073	0.2	<30
300-1,500			f/1500	<30
1,500-100,000			1.0	<30

f = frequency in MHz. * = Plane-wave equivalent power density.

According to ISED RSS-102 Issue 5 §2.5.2, Exemption Limits for Routine Evaluation- RF Exposure Evaluation,

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MH and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);

- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1.31 x 10^{-2} $f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density
P = power input to antenna
G = power gain of the antenna in the direction of interest relative to an isotropic radiator
R = distance to the center of radiation of the antenna

5.3 MPE Results for the FCC

UWB Standalone

Maximum output power at antenna input terminal (dBm):	-47.036
Maximum output power at antenna input terminal (mW):	0.0000198
Prediction distance (cm):	20
Prediction frequency (MHz):	6988.8
Maximum Antenna Gain, typical (dBi):	5.41
Maximum Antenna Gain (numeric):	3.48
Power density of prediction frequency at 20 cm (mW/cm^2):	0.00000001
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm^2):	1.0

The device is compliant with the FCC requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.00000001 mW/cm^2. Limit is 1.0 mW/cm^2.

Worst Case Co-location MPE Calculation: UWB and BLE

Radio	Max Conducted Power (dBm)	Evaluated Distance (cm)	Worst-Case Exposure Level	Limit	Worst-Case Ratios	Sum of Ratios	Limit
Worst Case							
BLE	3.07	20	0.00084 mW/cm2	1.0 mW/cm^2	0.084%	0.084%	100%
UWB	-47.036	20	0.00000001 mW/cm^2	1.0 mW/cm^2	0.000001%		

5.4 RF Exposure Evaluation Exemption for IC

The conducted output power of this device is -47.036 dBm, which is less than the exemption threshold, i.e., 5 W. Therefore, the RF exposure evaluation is exempt.

6 FCC §15.209, §15.519(c), (d) & ISEDC RSS-220 §3.4, §5.3.1(d), (e), RSS-Gen §8.9, §8.10 - Average Radiated Emissions

6.1 Applicable Standards

As per FCC §15.519(c), the radiated emissions at or below 960 MHz from a device operating under the provisions of this section shall not exceed the emission levels in §15.209

As per FCC §15.35(b): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4. 5 – 5. 15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5. 35 – 5. 46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 –167.17	3332 – 3339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3345.8 – 3358	23.6 – 24.0
12.29 – 12.293	240 – 285	3600 – 4400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per ISEDC RSS-Gen §8.9, except where otherwise indicated in the applicable RSS, radiated emissions shall comply with the field strength limits shown in the table below. Additionally, the level of any transmitter unwanted emission shall not exceed the level of the transmitter's fundamental emission.

General Field Strength Limits at Frequencies above 30 MHz

Frequency (MHz)	Field Strength (µv/m at 3 meters)
30-88	100
88-216	150
216-960	200
Above 960	500

As per ISEDC RSS-220 §5.3.1(c), Radiated emissions at or below 960 MHz from a device shall not exceed the limits in section 3.4

As per ISEDC RSS-220 §3.4, Radiated emissions at or below 960 MHz for all subclasses of UWB device shall not exceed the following limits. Measurements of radiated emissions at and below 960 MHz are to be made using a CISPR quasi-peak detector. CISPR measurement bandwidth specifications are to be used

Radiated Emissions at or below 960 MHz

Frequency (MHz)	Field Strength (Microvolts/m)	Measurement Distance (Metres)	E.i.r.p. (dBmW)
0.009-0.490	2,400/F (F in kHz)	300	10 log (17.28 / F^2) (F in kHz)
0.490-1.705	24,000/F (F in kHz)	30	10 log (17.28 / F^2) (F in kHz)
1.705-30	30	30	-45.7
30-88	100	3	-55.2
88-216	150	3	-51.7
216-960	200	3	-49.2

According to FCC §15.519(c): (c) The radiated emissions at or below 960 MHz from a device operating under the provisions of this section shall not exceed the emission levels in §15.209. The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz:

Frequency in MHz	EIRP in dBm
960-1610	-75.3
1610-1990	-63.3
1990-3100	-61.3
3100-10600	-41.3
Above 10600	-61.3

According to ISEDC RSS-220 §5.3.1(d): Radiated emissions above 960 MHz from a device shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz.

Frequency	EIRP
960-1610 MHz	-75.3 dBm
1.61-4.75 GHz	-70.0 dBm
4.75-10.6 GHz	-41.3 dBm
Above 10.6 GHz	-61.3 dBm

According to FCC §15.519(c): (d) In addition to the radiated emission limits specified in the table in paragraph (c) of this section, UWB transmitters operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of no less than 1 kHz:

Frequency in MHz	EIRP in dBm
1164-1240	-85.3
1559-1610	-85.3

According to ISEDC RSS-220 §5.3.1(e): In addition to the limits specified in paragraph (d) of this section, radiated emissions shall not exceed the following average limits when measured using a resolution bandwidth greater than or equal to 1 kHz. The measurements shall demonstrate compliance with the stated limits at whatever resolution bandwidth is used.

Frequency	e.i.r.p. in a Resolution Bandwidth of no less than 1 kHz
1164-1240 MHz	-85.3 dBm
1559-1610 MHz	-85.3 dBm

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart F and ISEDC RSS-220 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

6.3 Measurement Procedure

The EUT host, and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

For radiated testing the EUT was set 1 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 960 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 960 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 960 MHz:

The measurements were based on ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices section 10.3: Radiated measurement procedure above 960MHz.

6.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

CA = S.A. Reading + Correction Factor

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

Correction Factor = AF + CL + Atten – Ga

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

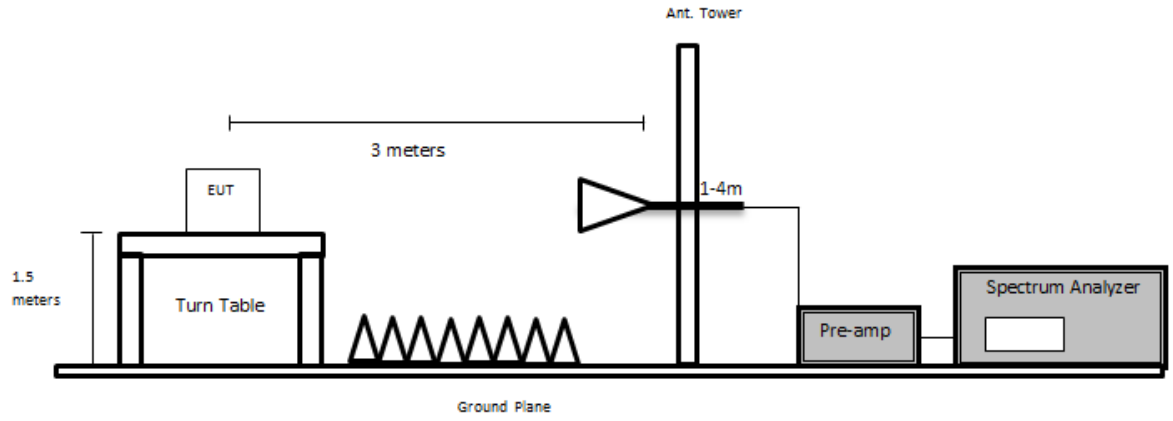
The "**Margin**" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$Margin = Corrected\ Amplitude - Limit$$

6.5 Test Setup Block Diagram

Above 1 GHz:

At 3 meters:



6.6 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
655	Rhode & Schwarz	Spectrum Analyzer	FSQ26	200749	2019-11-07	2 years
-	Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
1192	ETS Lindgren	Horn Antenna	3117	00218973	2021-09-04	2 years
658	Agilent	Preamplifier	8449B OPT HO2	3008A011 3	2021-05-06	1 year
-	-	SMA cable	-	-	Each time[1]	N/A
1077	Insulted Wire Corp.	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN-3960-KPS	DC 1917	2021-03-03	1 year

Note[1]: cable included in the test set-up will be checked each time before testing.
Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

6.7 Test Environmental Conditions

Temperature:	20-22 ºC
Relative Humidity:	42-50 %
ATM Pressure:	102.7 kPa

The testing was performed by Christian McCaig on 2021-10-18 in 5m3.

6.8 Test Results

Note: Measurements were performed at 3m distance.

Average Radiated Fundamental Field Strength

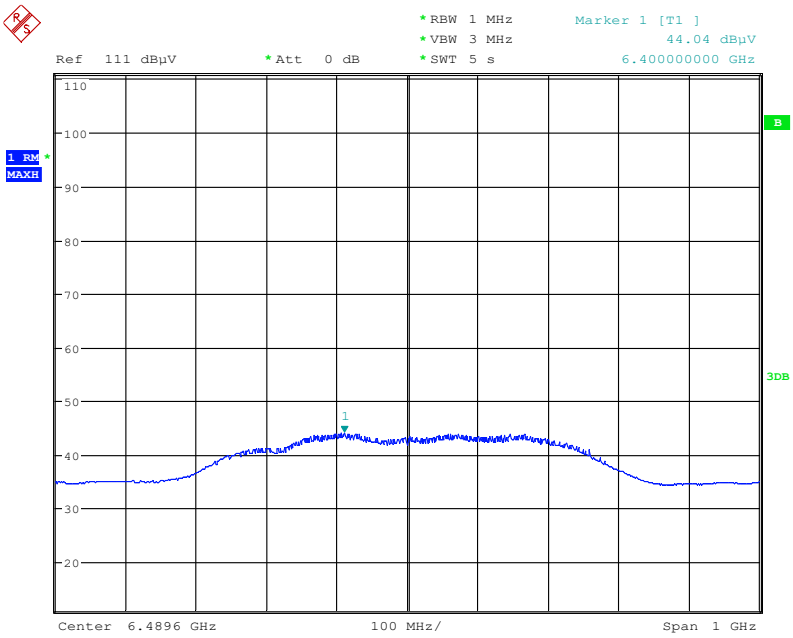
Channel Number	Channel Frequency (MHz)	Mode	PSA Reading (dBµV)	Antenna Factor (dB/m)	Cable Loss (dB)	Pre Amp Gain (dB)	Corrected Field Strength (dBµV/m at 3m)	EIRP (dBm)[1]	Limit (dBm)	Margin (dB)
5	6489.6	0	44.04	35.74	11.418	38.124	53.074	-42.126	-41.3	-0.856
6	6988.8	0	43.89	35.7	12.295	38.211	53.674	-41.526	-41.3	-0.256
9	7987.2	0	43.3	35.9	12.8	38.905	53.095	-42.105	-41.3	-0.835

Note[1]: EIRP [dBm] = Field Strength [dBµV/m at 3 meters] – 95.2.

Please refer to the following plots.

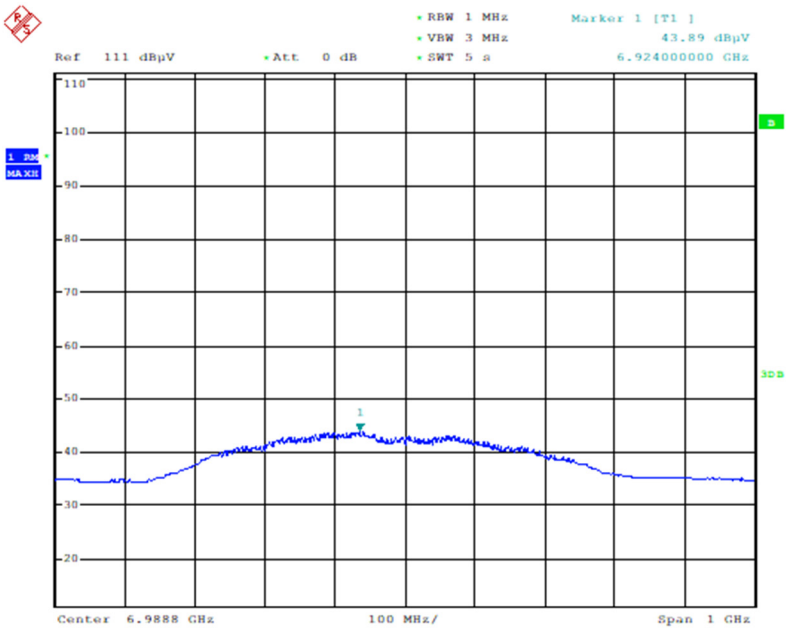
Channel 5 (6489.6 MHz), Fundamental Average Measurement

Mode 0



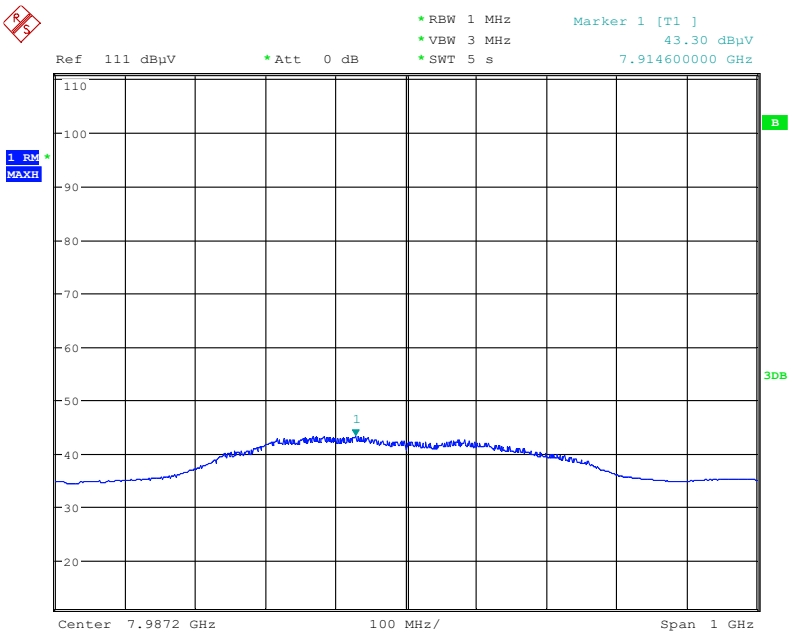
Channel 6 (6988.8 MHz), Fundamental Average Measurement

Mode 0



Channel 9 (7987.2 MHz), Fundamental Average Measurement

Mode 0



7 FCC §15.519(e), §15.521(e) & ISEDC RSS-220 §5.3.1(g) - Peak Fundamental Emission

7.1 Applicable Standards

According to FCC §15.519(e): There is a limit on the peak level of the emissions contained within a 50 MHz bandwidth centered on the frequency at which the highest radiated emission occurs, f_M. That limit is 0 dBm EIRP. It is acceptable to employ a different resolution bandwidth, and a correspondingly different peak emission limit, following the procedures described in §15.521.

According to FCC §15.521(e): The frequency at which the highest radiated emission occurs, f_M, must be contained within the UWB bandwidth.

According to ISEDC RSS-220 §5.3.1(g): The peak level of the transmissions shall not exceed the peak equivalent of the average limit contained within any 50 MHz bandwidth, as defined in section 4 of the Annex

According to ISEDC RSS-220 Annex 4(c): Peak measurements shall be made in addition to average measurements. Transmissions shall not exceed 0 dBm e.i.r.p. in any 50 MHz bandwidth when the average limit is -41.3 dBm/MHz.

According to FCC §15.521(g): When a peak measurement is required, it is acceptable to use a resolution bandwidth other than the 50 MHz specified in this subpart. This resolution bandwidth shall not be lower than 1 MHz or greater than 50 MHz, and the measurement shall be centered on the frequency at which the highest radiated emission occurs, f_M. If a resolution bandwidth other than 50 MHz is employed, the peak EIRP limit shall be 20 log (RBW/50) dBm where RBW is the resolution bandwidth in megahertz that is employed. This may be converted to a peak field strength level at 3 meters using E(dBuV/m) = P(dBm EIRP) + 95.2. If RBW is greater than 3 MHz, the application for certification filed with the Commission must contain a detailed description of the test procedure, calibration of the test setup, and the instrumentation employed in the testing.

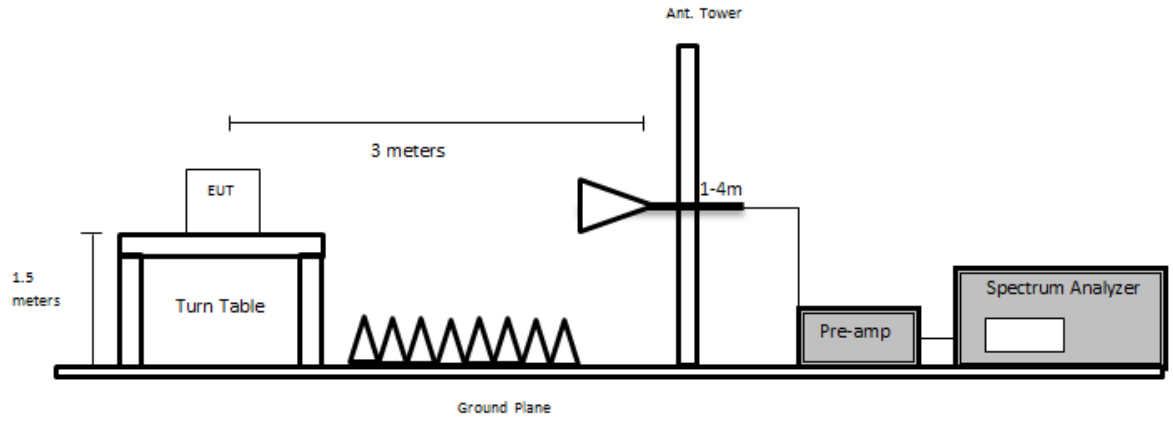
7.2 Measurement Procedure

The measurements were based on ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices section 10.3: Radiated measurement procedure above 960MHz.

7.3 Test Setup Block Diagram

Above 1GHz:

At 3 meters:



7.4 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
655	Rhode & Schwarz	Spectrum Analyzer	FSQ26	200749	2019-11-07	2 years
-	Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
1192	ETS Lindgren	Horn Antenna	3117	00218973	2021-09-04	2 years
658	Agilent	Preamplifier	8449B OPT HO2	3008A011 3	2021-05-06	1 year
-	-	SMA cable	-	-	Each time[1]	N/A
1077	Insulted Wire Corp.	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN-3960-KPS	DC 1917	2021-03-03	1 year

Note[1]: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

7.5 Test Environmental Conditions

Temperature:	23º C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2021-10-18 in 5m3.

7.6 Test Results

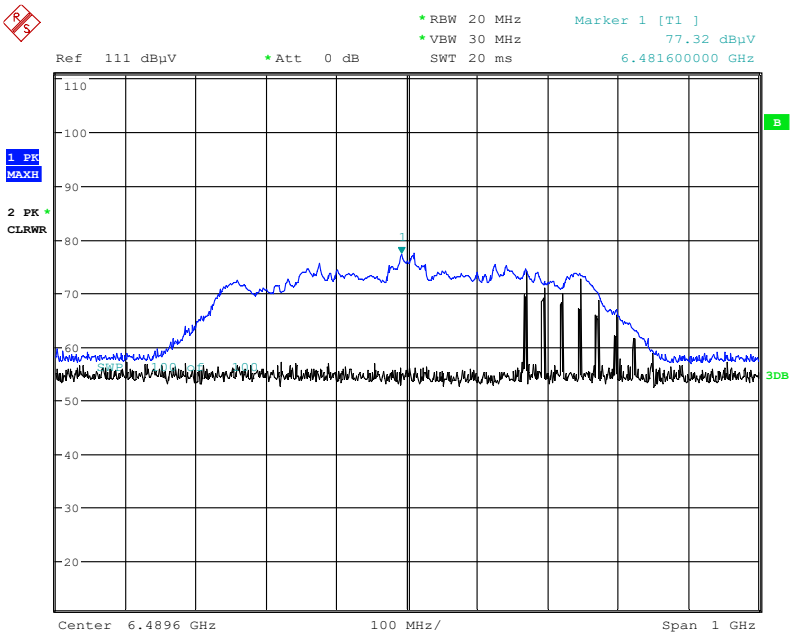
Channel Number	Channel Frequency (MHz)	Mode	PSA Reading (dBµV)	Antenna Factor (dB/m)	Cable Loss (dB)	Pre Amp Gain (dB)	Corrected Field Strength (dBµV/m at 3m)	Limit[1] (dBµV/m at 3m)	Margin (dB)
5	6489.6	0	77.32	35.74	11.418	38.124	86.354	87.24	-0.886
6	6988.8	0	76.75	35.7	12.295	38.211	86.534	87.24	-0.706
9	7987.2	0	76.54	35.9	12.80	38.905	86.335	87.24	-0.905

Note[1]: Radiated Peak limit determined using a 1MHz measurement BW. (i.e. 20*log(20/50)= -7.96dBm) then adding 95.2dB for field strength at 3 meters as instructed to in FCC §15.521(g)

Please refer to the following plots.

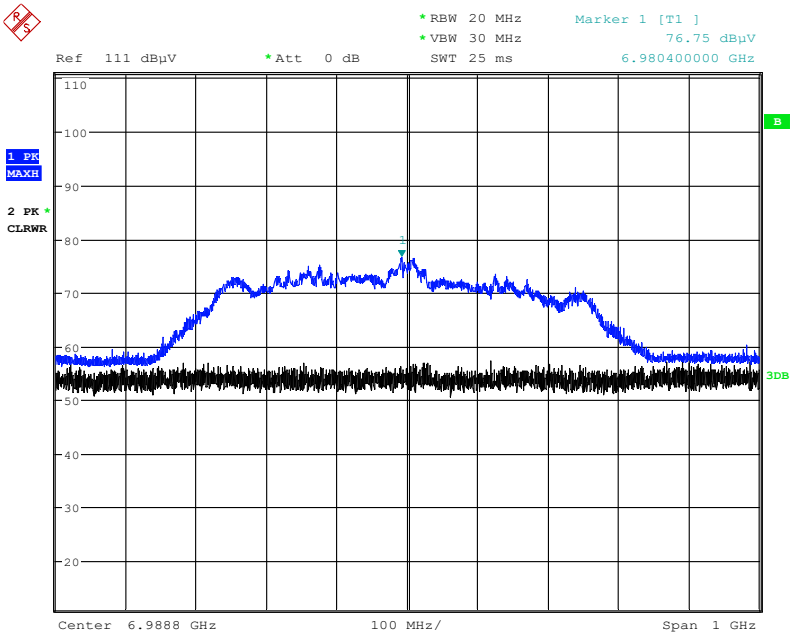
Channel 5 (6489.6 MHz), Fundamental Peak Measurement

Mode 0



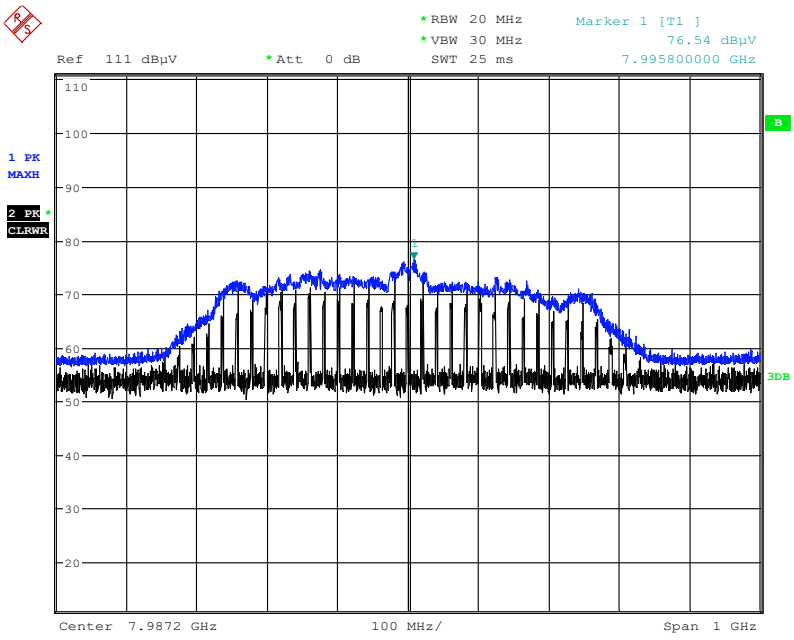
Channel 6 (6988.8 MHz), Fundamental Peak Measurements

Mode 0



Channel 9 (7987.2 MHz), Fundamental Peak Measurement

Mode 0



9 Annex A (Normative) - Test Setup Photographs

Please refer to the attachment

10 Annex B (Normative) - EUT External Photographs

Please refer to the attachment

11 Annex C (Normative) - EUT Internal Photographs

Please refer to the attachment

12 Annex D (Informative) – Manufacturer Declaration of Similarity

DECLARATION LETTER

October 25, 2021

To:
FEDERAL COMMUNICATIONS COMMISSIONS
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

Innovation, Science and Economic Development Canada
Certification and Engineering Bureau
P.O. Box 11490, Station 'H'
3701 Carling Ave., Building 94
Ottawa, Ontario K2H 8S2
Canada

Dear Sir or Madam:

We *Tesla Inc.* hereby declare that product: *Fascia Endpoint,* model(s): *1733130 (FCC ID: 2AEIM-1733130, IC: 20098-1733130)* is similar as model: *1613851 (FCC ID: 2AEIM-1613851, IC: 20098-1613851)* tested by BACL, the results of which are featured in BACL project: *R2009183*

A description of the differences and similarity between the tested models are as follows:

Model Number	***Similar***	***Difference***
1733130	*UWB layout*	*Add UHF receiver function BLE Antenna Change*
1613851	*UWB layout*	*No UHF function*

For above modification which is not affect original test data. As a result, the UWB data will be referred to previous certified model: 1613851 (FCC ID: 2AEIM-1613851, IC: 20098-1613851).

Please contact me should there be need for any additional clarification or information.

Best Regards,

Peng Zhang Sr Staff Certification Engineer
3500 Deer Creek Road, Palo Alto, CA 94304

13 Annex E (Normative) - A2LA Electrical Testing Certificate

Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 *General requirements for the competence of testing and calibration laboratories*. This laboratory also meets A2LA *R222 - Specific Requirements EPA ENERGY STAR Accreditation Program*. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (*refer to joint ISO-ILAC-IAF Communiqué dated April 2017*).

Presented this 10th day of March 2021.

Trace McInturff, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2022

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope

https://www.a2la.org/scopepdf/3297-02.pdf

--- END OF REPORT ---