





**FCC PART 15, SUBPART C**  
**ISED C RSS-247, ISSUE 2, FEBRUARY 2017**  
**TEST AND MEASUREMENT REPORT**

For

**Tesla, Inc.**

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

**FCC ID: 2AEIM-1817073**  
**IC: 20098-1817073**

<b>Report Type:</b> Original Report	<b>Product Type:</b> Automotive Part
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**Note:** This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA\*, NIST, or any agency of the Federal Government.

\* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "\*" (Rev.2)

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**DOCUMENT REVISION HISTORY**

<b>Revision Number</b>	<b>Report Number</b>	<b>Description of Revision</b>	<b>Date of Revision</b>
0	R2301231-247	Original Report	2023-03-10

## **1 General Description**

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### **1.1 Product Description for Equipment Under Test (EUT)**

This test report was prepared on behalf of *Tesla, Inc.*, and their product model: 1817073, FCC ID: 2AEIM-1817073, IC: 20098-1817073 or the “EUT” as referred to in this report. It is Rear left endpoint with Bluetooth Low Energy radio that operates within the 2400-2483.5 MHz frequency range and Ultra Wide-band (UWB).

### **1.2 Mechanical Description of EUT**

1817073 measures approximately 4.8 cm (Length) x 14.2 cm (Width) x 1.4 cm (Height).

*The data gathered is from a production sample provided by Tesla, Inc. R2301231-1.*

### **1.3 Objective**

This report was prepared on behalf of *Tesla, Inc.* in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission’s rules and ISED RSS-247 Issue 2, February 2017.

The objective was to determine compliance with FCC Part 15.247 and ISED RSS-247 for Antenna Requirement, RF Exposure, AC Line Conducted Emissions, Emission Bandwidth, Radiated & Conducted Spurious Emissions, 100 kHz Band Edges, Maximum Output Power, and Peak Power Spectrum Density

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

FCC Part 15, Subpart F, Equipment Class: UWB with FCC ID: 2AEIM-1817073, IC: 20098-1817073

### **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.

## 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	$\pm 5\%$
RF output power, conducted	$\pm 0.57\text{ dB}$
Power Spectral Density, conducted	$\pm 1.48\text{ dB}$
Unwanted Emissions, conducted	$\pm 1.57\text{ dB}$
All emissions, radiated	$\pm 4.0\text{ dB}$
AC power line Conducted Emission	$\pm 2.0\text{ dB}$
Temperature	$\pm 2^\circ\text{C}$
Humidity	$\pm 5\%$
DC and low frequency voltages	$\pm 1.0\%$
Time	$\pm 2\%$
Duty Cycle	$\pm 3\%$

## 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, 3<sup>rd</sup>-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02),** 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 17025:2017 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 17025:2017 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 3297.03) 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 3297.01) 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 - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
  - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - o 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:
  - o ENERGY STAR Recognized Test Laboratory – US EPA
  - o Telecommunications Certification Body (TCB) – US FCC;
  - o 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 in accordance to ANSI C63.10.

### 2.2 EUT Exercise Software

The software “BTool – Bluetooth Low Energy PC Application v1.41.11” was used to transmit signal for all the modules. The software was provided by *Tesla Motors, Inc* and verified by Christian Schwartz to comply with the standard requirements being tested against. The following channels and power settings were selected for testing.

PHY1

Channel Frequency (MHz)	Power Setting
2402	0xE
2440	0xE
2480	0xE

PHY2

Channel Frequency (MHz)	Power Setting
2402	0xE
2440	0xE
2480	0xE

### 2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

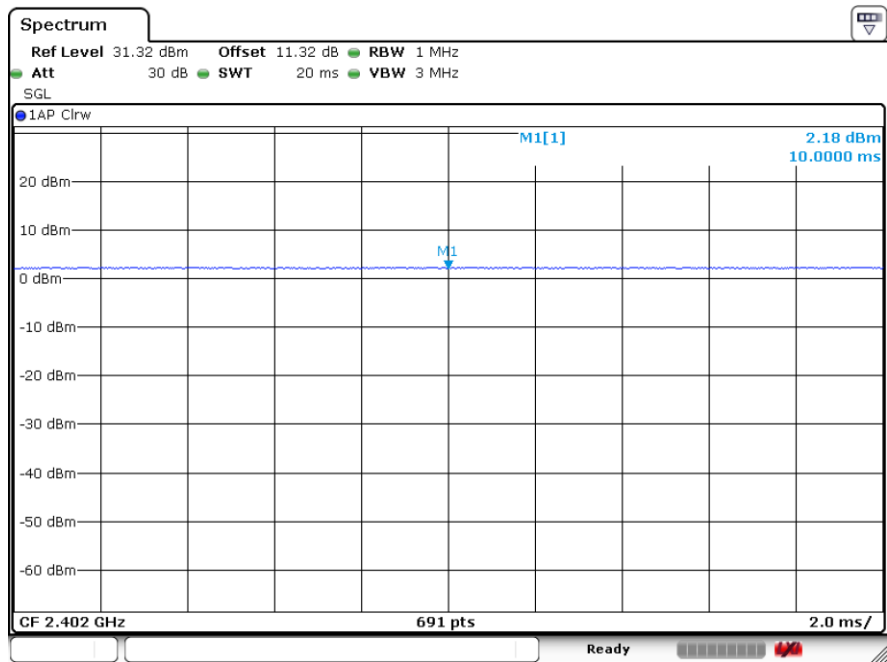
Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

Rate	Radio frequency (MHz)	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
PHY1	2402	-	-	100	0
PHY2	2402	-	-	100	0

Duty Cycle = On Time (ms)/ Period (ms)  
Duty Cycle Correction Factor (dB) = 10\*log(1/Duty Cycle)

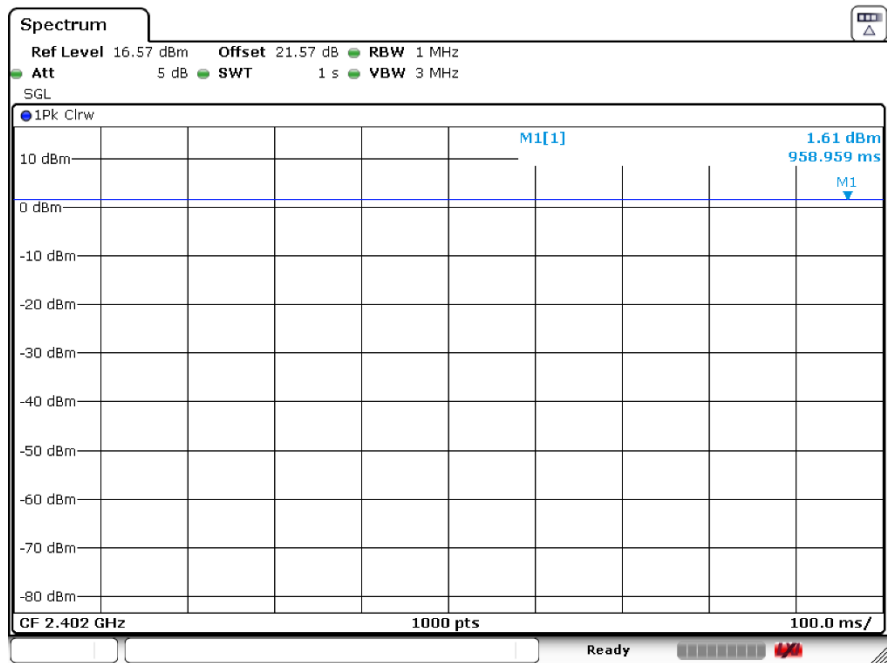
Please refer to the following plots.

## PHY1



Date: 13.FEB.2023 11:25:34

## PHY2



Date: 2.MAR.2023 09:33:47

## 2.4 Equipment Modifications

N/A

## 2.5 Local Support Equipment

Manufacturer	Description	Model No.	Serial No.
Volteq	DC Power Supply	HY5003D	160402343

## 2.6 Remote Support Equipment

Manufacturer	Description	Model
HP	Laptop	ZBook Studio G3
Teensy	Microcontroller	-

## 2.7 Interface Ports and Cabling

Cable Descriptions	Length (m)	From	To
USB Type A to Micro USB Type B	< 1 m	Microcontroller	Laptop
Power cables	< 1 m	EUT	Power Supply
RS-232	< 1 m	EUT	Microcontroller

### 3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISED Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1091, §15.247(i) ISED RSS-102	RF Exposure	Compliant
FCC §15.207 ISED RSS-Gen §8.8	AC Line Conducted Emissions	N/A <sup>1</sup>
FCC §15.209, §15.247(d) ISED RSS-247 §5.5 RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISED RSS-247 §5.2 RSS-Gen §6.7	6 dB & 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISED RSS-247 §5.4	Maximum Output Power	Compliant
FCC §15.247(e) ISED RSS-247 §5.2(2)	Peak Power Spectral Density	Compliant
FCC §15.247(d) ISED RSS-247 §5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §2.1051, §15.247 (d) ISED RSS-247 §5.5	Spurious Emissions at Antenna Port	Compliant

Note<sup>1</sup>: Device is powered by car battery.

*BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.*

## 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.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

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

This radio transmitter 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	Frequency Range (MHz)	Antenna Type	Maximum Antenna Gain (dBi)
Integral	2400-2483.5 MHz	Trace Antenna	4.25

Antenna gain is information provided by customer.

## 5 FCC §2.1091, §15.247(i) & ISEDC RSS-102 - RF Exposure

### 5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

#### Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Averaging Time (minutes)
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 <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	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 MHz<sup>6</sup> 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  $1.31 \times 10^{-2} f^{0.6834}$  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

### BLE Standalone

Maximum peak output power at antenna input terminal (dBm): 3.5

Maximum peak output power at antenna input terminal (mW): 2.24

Prediction distance (cm): 20

Prediction frequency (MHz): 2402

Maximum Antenna Gain, typical (dBi): 4.25

Maximum Antenna Gain (numeric): 2.66

Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>): 0.0012

FCC MPE limit for uncontrolled exposure at prediction frequency 1.0  
(mW/cm<sup>2</sup>):

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.0012 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

### 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	3.5	20	0.0012 mW/cm <sup>2</sup>	1.0 mW/cm <sup>2</sup>	0.12%	0.12%	100%
UWB	-41.674*	20	0.0000000135 mW/cm <sup>2</sup>	1.0 mW/cm <sup>2</sup>	0.00000135%		

Note\*: EIRP

## 5.4 RF exposure evaluation exemption for IC

### BLE

Maximum EIRP power = 3.5 dBm + 4.25 dBi = 7.75 dBm which is lesser than  $1.31 \times 10^{-2} f^{0.6834} = 2.6764 \text{ W} = 34.276 \text{ dBm}$ .

Therefore, the RF exposure Evaluation is exempt.

## 6 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

### 6.1 Applicable Standards

As per FCC §15.35(d): 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	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	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 FCC §15.247 (d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator 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, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

As per ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emission from licence-exempt transmitters shall comply with the field strength limits shown in the table below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

#### General Field Strength Limits for Licence-Exemption Transmitters 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

\* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for licence-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

## 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 C and ISED RSS-247 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 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was connected to the AC floor outlet.

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

The EUT was set 1 meter and 3 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 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

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

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1MHz / VBW = 10Hz / Sweep = Auto

## 6.4 Corrected Amplitude & 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:

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

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:

$$\text{Correction Factor} = AF + CL + \text{Atten} - Ga$$

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

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:

$$CA = Ai + AF + CL + \text{Atten} - Ga$$

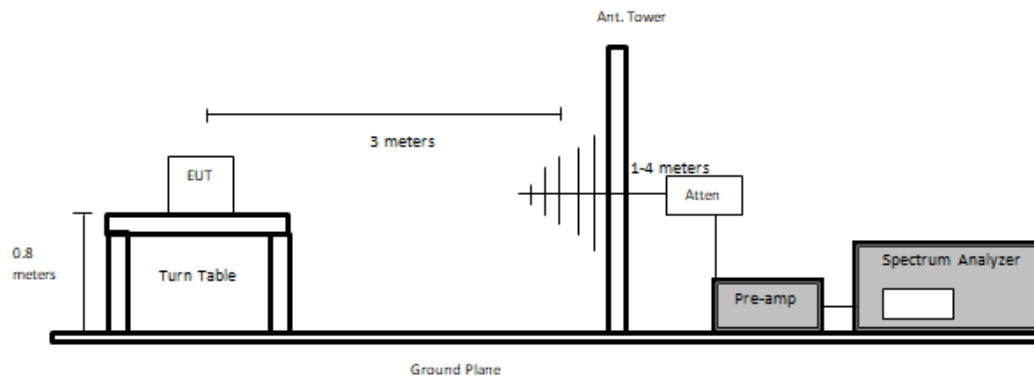
For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

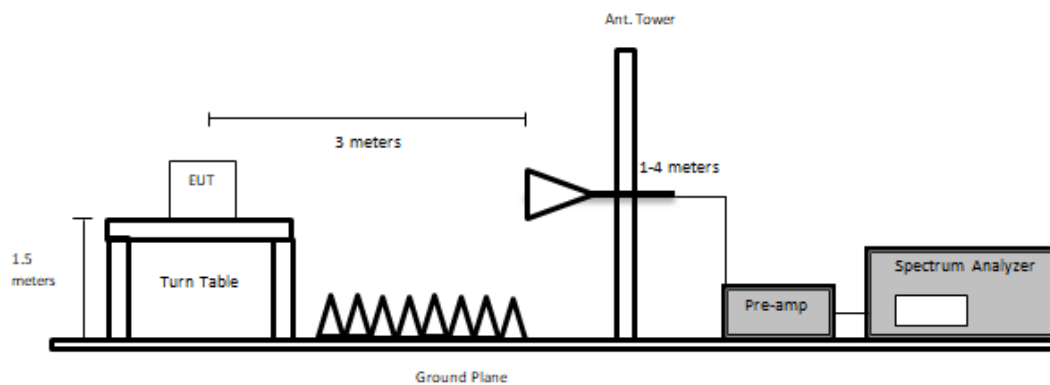
## 6.5 Test Setup Block Diagram

Below 1GHz:

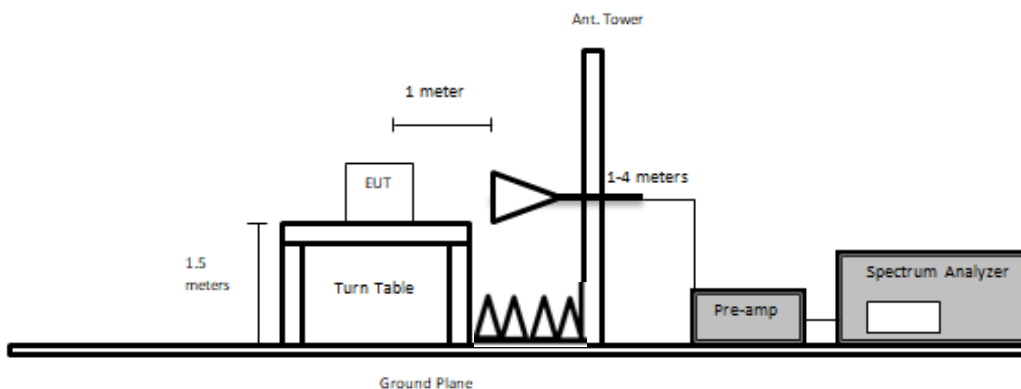


Above 1GHz:

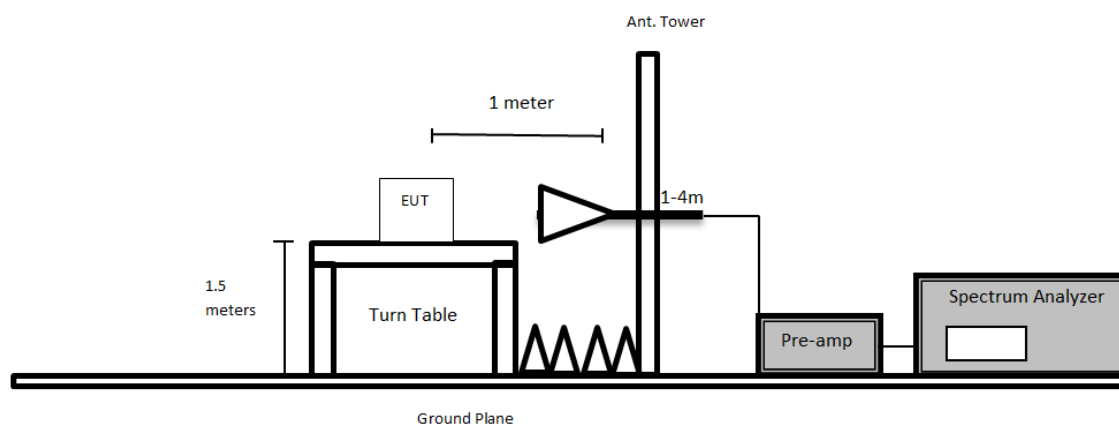
At 3 meters:



At 1 meter with asset#1192:



At 1 meter with asset#91:



## 6.6 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rhode & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	2 years
287	Agilent	Spectrum Analyzer	E4446A	US44300386	2022-05-05	1 year
124	Rhode & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100044	2021-05-14	2 years
-	Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
321	Sunol Sciences	Antenna, Log-Periodic	JB3	A020106-2	2021-11-22	2 years
1192	ETS Lindgren	Antenna, Horn	3117	00218973	2022-09-29	2 years
91	Wisewave	Antenna, Horn	ARH-4223-02	10555-02	2022-03-08	2 years
-	-	SMA cable	-	-	Each time <sup>1</sup>	N/A
-	-	Notch Filter	-	-	Each time <sup>1</sup>	N/A
1186	Pasternack	Coaxial Cable, RG213	PE3496-800CM	2111301	2022-09-26	1 year
1295	Carlisle	10m Ultra Low Loss Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2022-10-28	6 months
827	AH Systems	Pre-Amplifier	PAM 1840 VH	170	2022-06-21	1 year
658	Agilent	Pre-Amplifier	8449B	3008A01103	2022-07-22	1 year
459	HP	Pre-Amplifier	8447D	2443A04374	2022-12-28	6 months
-	Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note<sup>1</sup>: cable and notch filter 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

<b>Temperature:</b>	19 °C
<b>Relative Humidity:</b>	34 %
<b>ATM Pressure:</b>	102.2 kPa

The testing was performed by Deepak Mishra from 2023-02-01 to 2023-02-08 at 5 meter chamber 3.

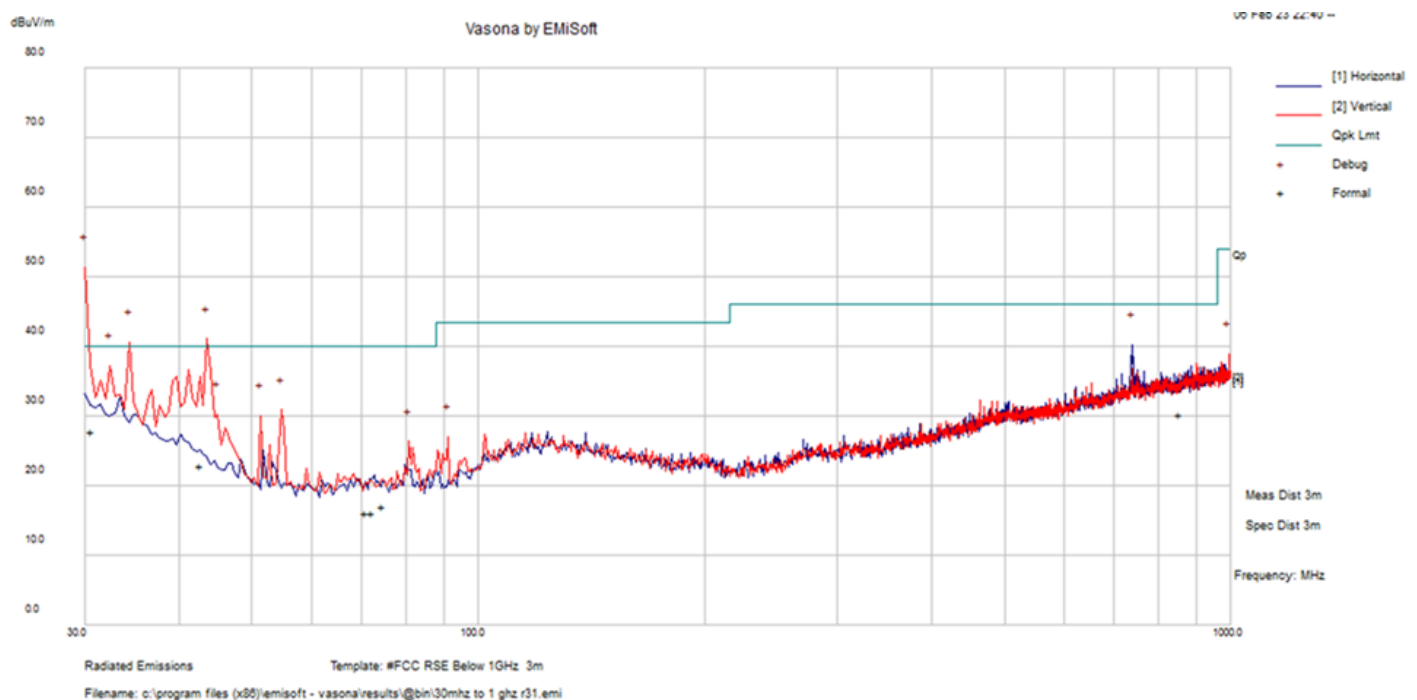
## 6.8 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Part 15C and ISED RSS-247 standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Transmitting Channel (MHz)
-8.23	16830.68	H	2402, PHY1

## 6.9 Radiated Emissions Test Results

### 1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters



Frequency (MHz)	S.A. Reading (dBUV)	Correction Factor (dB/m)	Corrected Amplitude (dBUV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBUV/m)	Margin (dB)	Comment
30	29.09	-0.98	28.11	104	V	266	40	-11.89	Pass
43.81575	34.04	-10.06	23.98	246	V	43	40	-16.02	Pass
34.337	31.85	-3.91	27.94	291	V	286	40	-12.06	Pass
32.28225	29.06	-2.58	26.48	109	V	206	40	-13.52	Pass
739.1903	35.52	1.74	37.26	118	H	315	46	-8.74	Pass
54.50325	29.78	-13.64	16.14	114	V	79	40	-23.86	Pass

FCC/IC Limits for 1 GHz to 26.5 GHz				
Applicability	(dBm)	(uV/m at 3meters)	(dBuV/m at 3meters)	(dBuV/m at 1meter) <sup>2</sup>
Restricted Band Average Limit	-	500	54	64
Restricted Band Peak Limit <sup>1</sup>	-	-	74	84

Note<sup>1</sup>: Restricted Band Peak Limit is defined to be 20dB higher than Average Limit.

Note<sup>2</sup>: Limits at 1 meter are determined by applying a Distance correction factor accounts for extrapolation from 1 meters to 3 meters. Formula used is as follows:  $20 \cdot \log(3\text{meters}/1\text{meter}) = 9.54$  (According to ANSI C63.10-2013 Section 9.4)

## 2) 1–26.5 GHz, Measured at 3 Meters and 1 Meter

### PHY1

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC/ISED		Note
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel Frequency: 2402 MHz											
2390	51.012	283	129	H	32.142	4.984	37.896	50.242	74	-23.758	Peak
2390	51.400	118	262	V	32.142	4.984	37.896	50.63	74	-23.37	Peak
2390	-	283	129	H	-	-	-	30.242	54	-23.758	Ave
2390	-	118	262	V	-	-	-	30.63	54	-23.37	Ave
4804	52.960	145	215	H	34.418	7.097	36.701	57.774	74	-16.226	Peak
4804	51.980	50	105	V	34.418	7.097	36.701	56.794	74	-17.206	Peak
4804	-	145	215	H	-	-	-	37.774	54	-16.226	Ave
4804	-	50	105	V	-	-	-	36.794	54	-17.206	Ave
Middle Channel Frequency: 2440 MHz											
4880	51.090	291	129	H	34.360	7.231	36.796	55.885	74	-18.115	Peak
4880	50.110	248	117	V	34.360	7.231	36.796	54.905	74	-19.095	Peak
4880	-	291	129	H	-	-	-	35.885	54	-18.115	Ave
4880	-	248	117	V	-	-	-	34.905	54	-19.095	Ave
High Channel Frequency: 2480 MHz											
2483.5	57.700	75	210	H	32.672	5.080	37.913	57.539	74	-16.461	Peak
2483.5	53.950	88	107	V	32.672	5.080	37.913	53.789	74	-20.211	Peak
2483.5	-	75	210	H	-	-	-	37.539	54	-16.461	Ave
2483.5	-	88	107	V	-	-	-	33.789	54	-20.211	Ave
4960	55.770	312	101	H	34.419	7.315	36.905	60.599	74	-13.401	Peak
4960	53.050	286	270	V	34.419	7.315	36.905	57.879	74	-16.121	Peak
4960	-	312	101	H	-	-	-	40.599	54	-13.401	Ave
4960	-	286	270	V	-	-	-	37.879	54	-16.121	Ave

Note: Duty Cycle in normal operation is protocol limited to 10% as a worst case. Thus, per KDB 558074, Section 11 Q/A #3, the operational duty cycle of the EUT is subtracted from the Peak reading to derive the RMS average value.

Note: Ave = Peak – 20log(1/DC). Ave = Peak – 20dB.

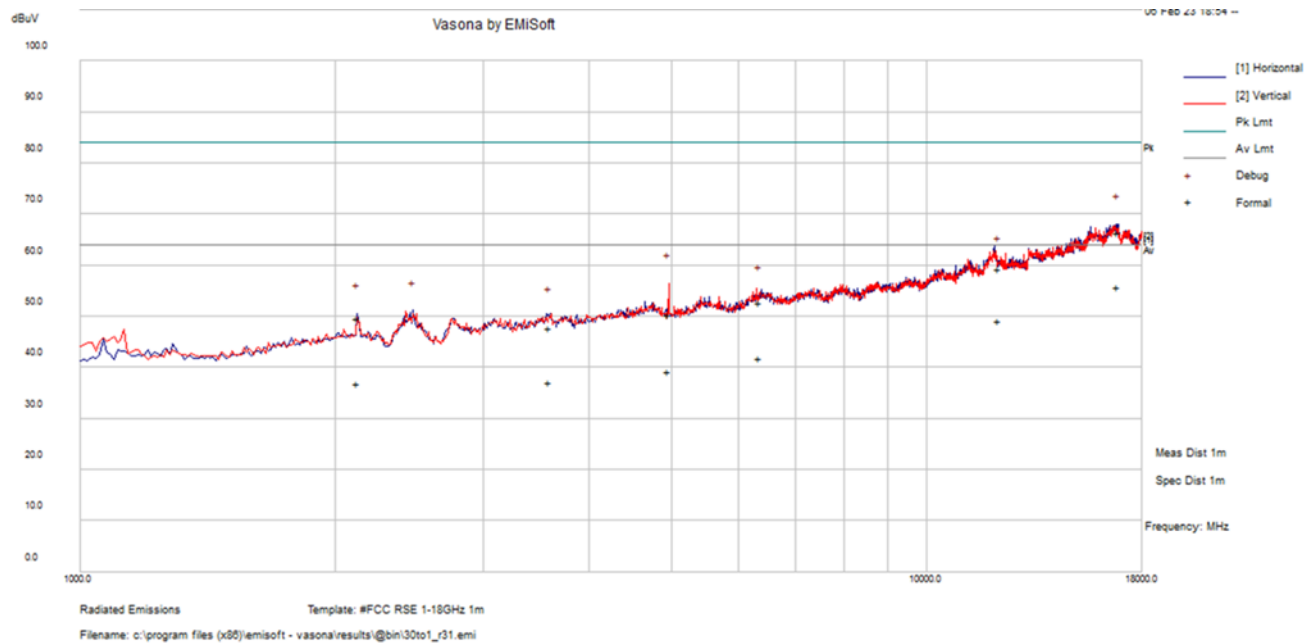


## PHY2

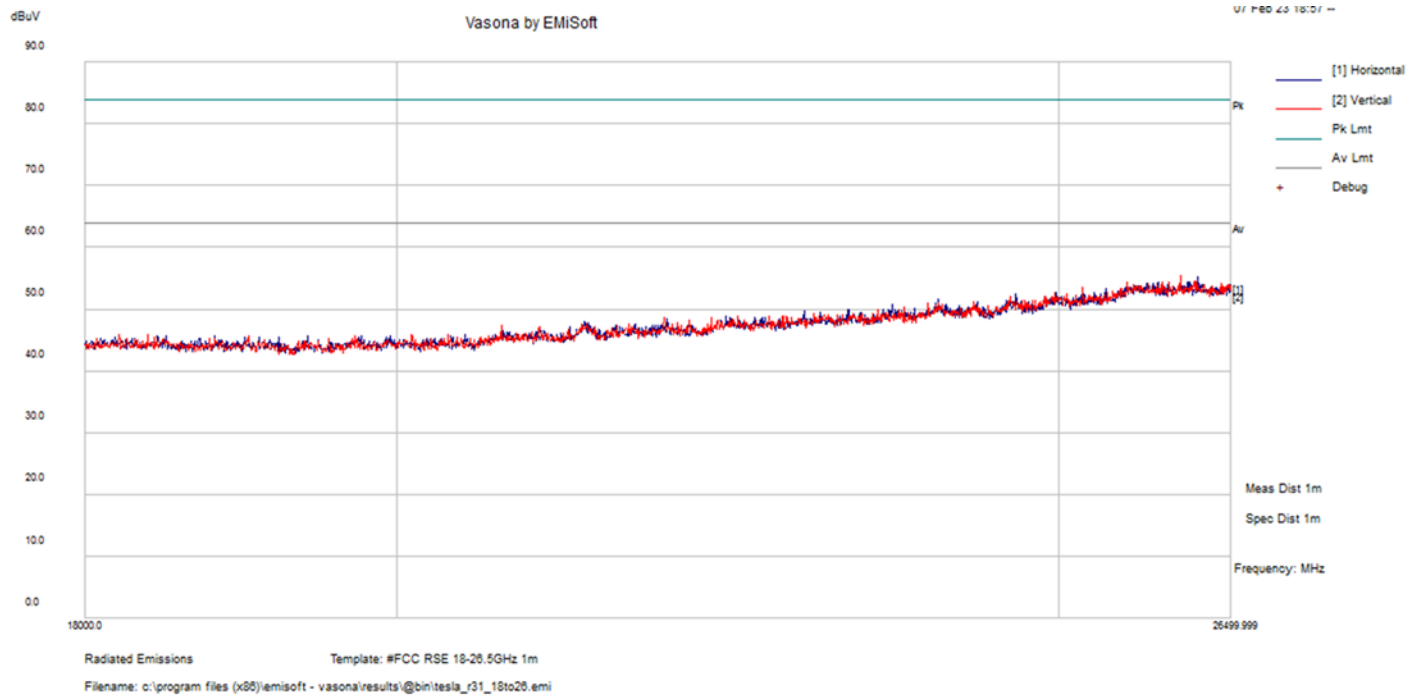
Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC/ISED		Note
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel Frequency: 2402 MHz											
2390	53.020	353	143	H	32.142	4.984	37.896	52.25	74	-21.75	Peak
2390	50.790	349	235	V	32.142	4.984	37.896	50.02	74	-23.98	Peak
2390	-	353	143	H	-	-	-	32.25	54	-21.75	Ave
2390	-	349	235	V	-	-	-	30.02	54	-23.98	Ave
4804	52.190	154	240	H	34.360	7.231	36.796	56.985	74	-17.015	Peak
4804	50.192	66	127	V	34.360	7.231	36.796	54.987	74	-19.013	Peak
4804	-	154	240	H	-	-	-	36.985	54	-17.015	Ave
4804	-	66	127	V	-	-	-	34.987	54	-19.013	Ave
Middle Channel Frequency: 2440 MHz											
4880	52.190	154	240	H	34.360	7.231	36.796	56.985	74	-17.015	Peak
4880	50.192	66	127	V	34.360	7.231	36.796	54.987	74	-19.013	Peak
4880	-	154	240	H	-	-	-	36.985	54	-17.015	Ave
4880	-	66	127	V	-	-	-	34.987	54	-19.013	Ave
High Channel Frequency: 2480 MHz											
2483.5	61.020	355	156	H	32.672	5.080	37.913	60.859	74	-13.141	Peak
2483.5	54.290	202	208	V	32.672	5.080	37.913	54.129	74	-19.871	Peak
2483.5	-	355	156	H	-	-	-	40.859	54	-13.141	Ave
2483.5	-	202	208	V	-	-	-	34.129	54	-19.871	Ave
4960	51.990	153	124	H	34.419	7.315	36.905	56.819	74	-17.181	Peak
4960	49.280	356	241	V	34.419	7.315	36.905	54.109	74	-19.891	Peak
4960	-	153	124	H	-	-	-	36.819	54	-17.181	Ave
4960	-	356	241	V	-	-	-	34.109	54	-19.891	Ave

Note: Duty Cycle in normal operation is protocol limited to 10% as a worst case. Thus, per KDB 558074, Section 11 Q/A #3, the operational duty cycle of the EUT is subtracted from the Peak reading to derive the RMS average value.

Note: Ave = Peak – 20log(1/DC). Ave = Peak – 20dB.

**1 – 18 GHz Worst Case Pre-Scan, Measured at 1 meter**

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
16830.68	45.68	20.82	66.5	134	H	103	84	-17.5	Pass
12167.851	44.19	15.02	59.21	163	H	147	84	-24.79	Pass
4961.475	45.47	4.89	50.36	215	V	308	84	-33.64	Pass
6348.821	44.93	7.73	52.66	168	H	167	84	-31.34	Pass
2124.805	51.16	-1.55	49.61	106	H	136	84	-34.39	Pass
3582.1295	45.54	2.29	47.83	205	H	251	84	-36.17	Pass
16830.68	34.94	20.83	55.77	134	H	103	64	-8.23	Pass
12167.851	34.1	15.02	49.12	163	H	147	64	-14.88	Pass
4961.475	34.32	4.89	39.21	215	V	308	64	-24.79	Pass
6348.821	34.11	7.72	41.83	168	H	167	64	-22.17	Pass
2124.805	38.31	-1.54	36.77	106	H	136	64	-27.23	Pass
3582.1295	34.86	2.28	37.14	205	H	251	64	-26.86	Pass

**18 – 26.5 GHz Worst Case Pre-Scan, Measured at 1 meter**

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
26113	34.27	19.87	54.13	100	V	7	64	-9.87	Peak

Note: Max peak emission compared to average limit to show compliance.

## 7 FCC §15.247(a) (2) & ISEDC RSS-247 §5.2, RSS-Gen §6.7 - Emission Bandwidth

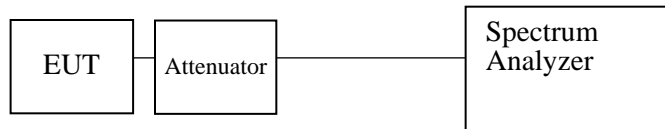
### 7.1 Applicable Standards

According to FCC §15.247(a) (2) and ISEDC RSS-247 §5.2: the minimum 6 dB bandwidth shall be 500 kHz.

### 7.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

### 7.3 Test Setup Block Diagram



### 7.4 Test Equipment List and Details

BACL Number	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	2 years
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k3 9-101203-UW	2022-05-05	1 year
-	-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	10dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	RF cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator 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

<b>Temperature:</b>	21° C
<b>Relative Humidity:</b>	39 %
<b>ATM Pressure:</b>	102.0 KPa

The testing was performed by Christian Schwartz on 2023-01-30 and 2023-02-28 at RF test site.

## 7.6 Test Results

### PHY1

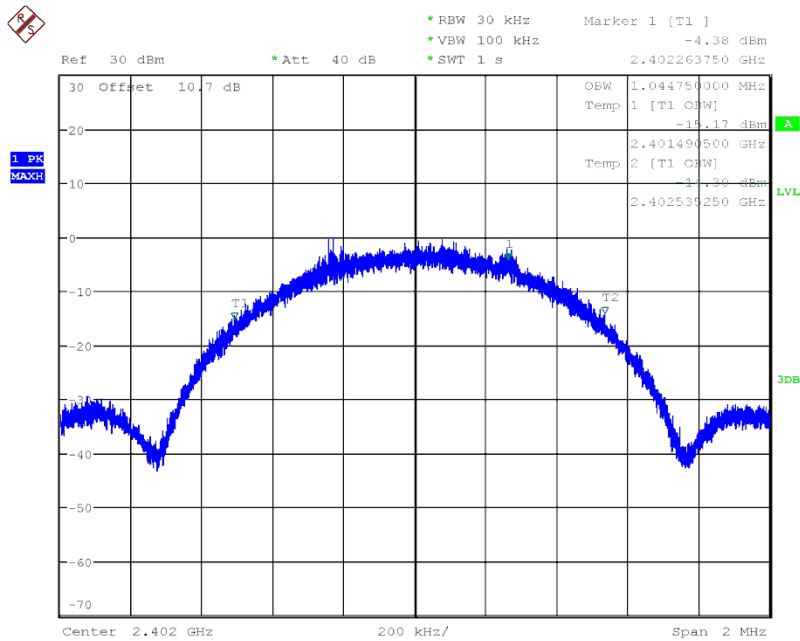
Channel	Frequency (MHz)	99% OBW (MHz)	6 dB OBW (kHz)	6 dB OBW limit (kHz)
Low	2402	1.04475	661	> 500
Middle	2440	1.05325	670.75	> 500
High	2480	1.0835	671.25	> 500

### PHY2

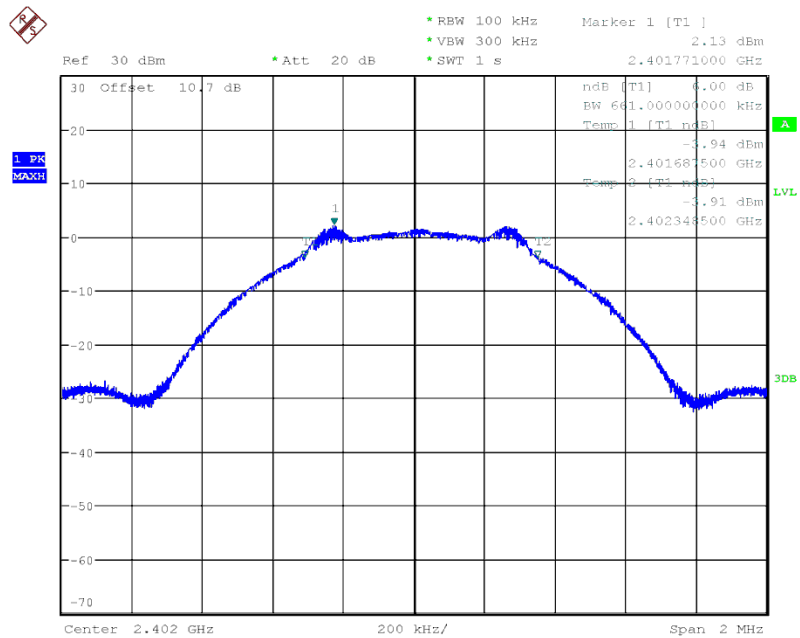
Channel	Frequency (MHz)	99% OBW (MHz)	6 dB OBW (kHz)	6 dB OBW limit (kHz)
Low	2402	2.1055	1165.5	> 500
Middle	2440	2.155	1156	> 500
High	2480	2.13	1151	> 500

Please refer to the following plots for detailed test results.

PHY1  
2402 MHz, 99% OBW



2402 MHz, -6 dB OBW



[illegible]

Ref 30 dBm      \*Att 20 dB      \*RBW 100 kHz      \*VBW 300 kHz      \*SWT 1 s      Marker 1 [T1]      1.57 dBm      2.440270000 GHz

30 Offset 10.7 dB

20      dB [T1]      4.00 dB  
BW 670.750000000 kHz  
Temp 1 [T1 dB]      -4.50 dBm

10      2.439683750 GHz  
Temp 2 [T1 dB]      -4.44 dBm  
2.440354500 GHz

0      1      12

-10

-20

-30

-40

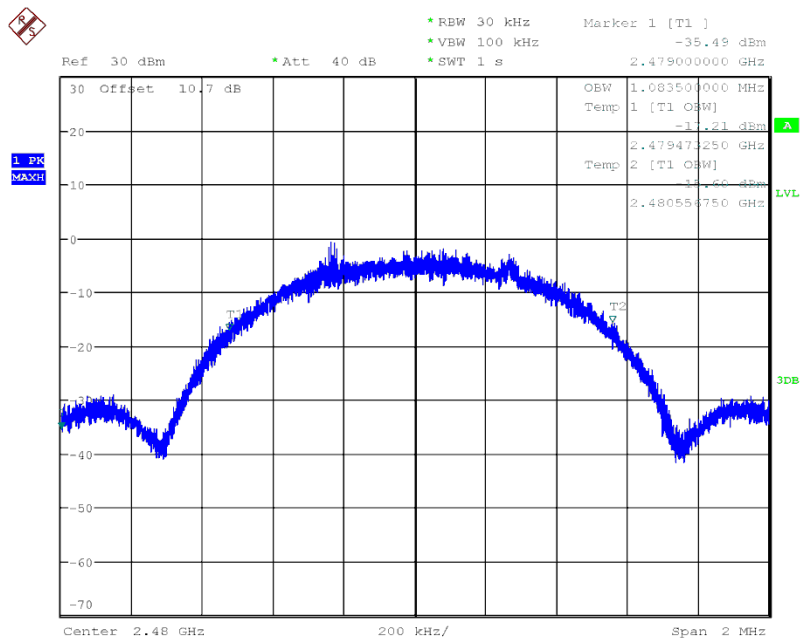
-50

-60

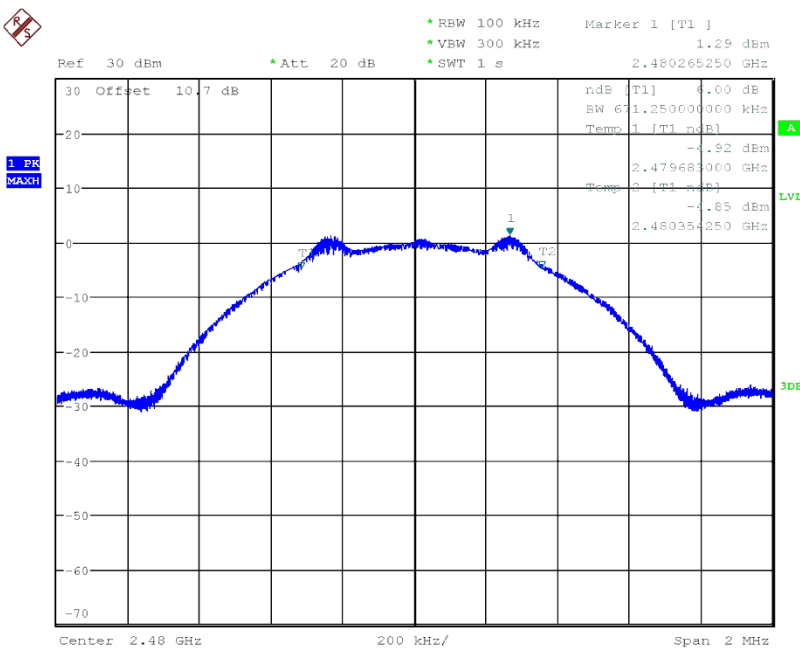
-70

Center 2.44 GHz      200 kHz/      Span 2 MHz

2480 MHz, 99% OBW



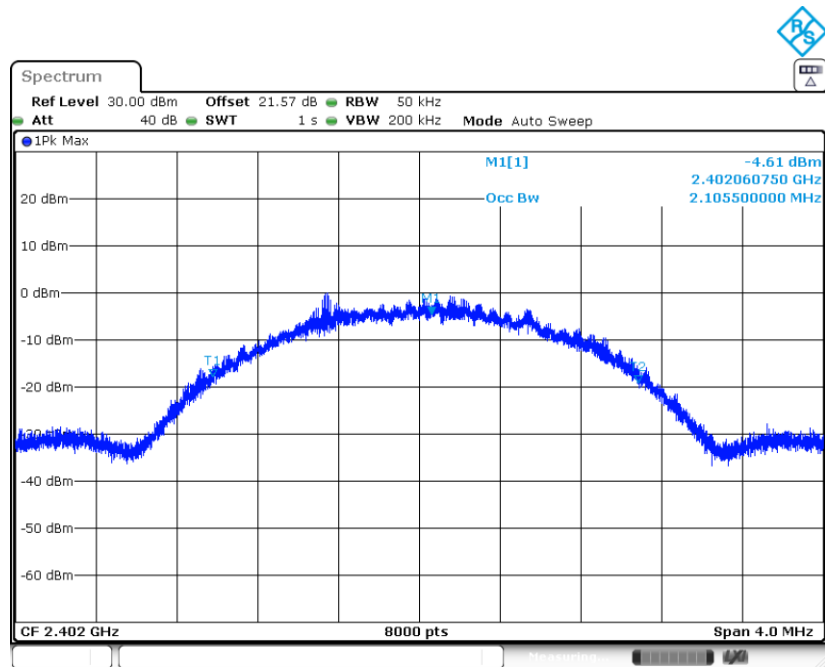
2480 MHz, -6 dB OBW



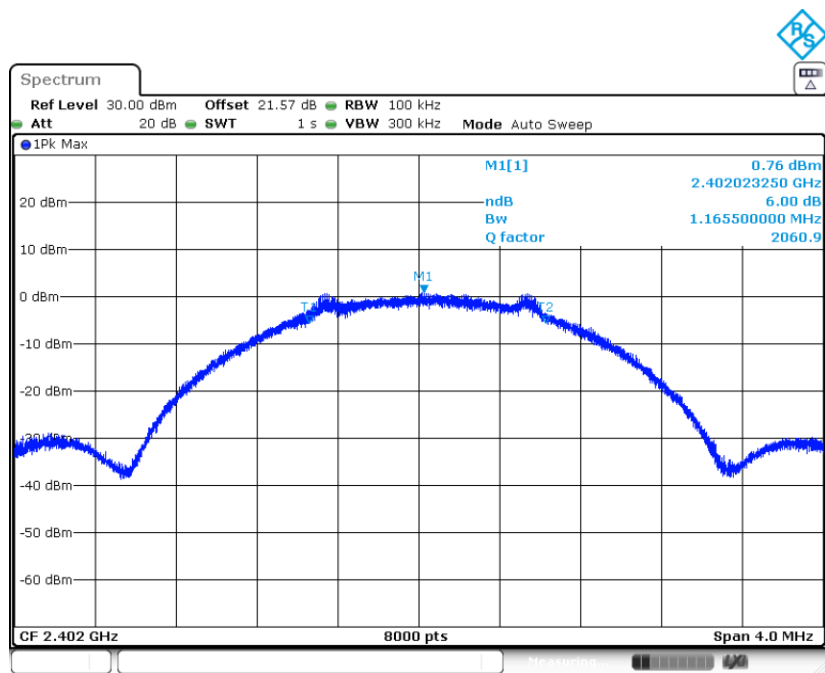


## PHY2

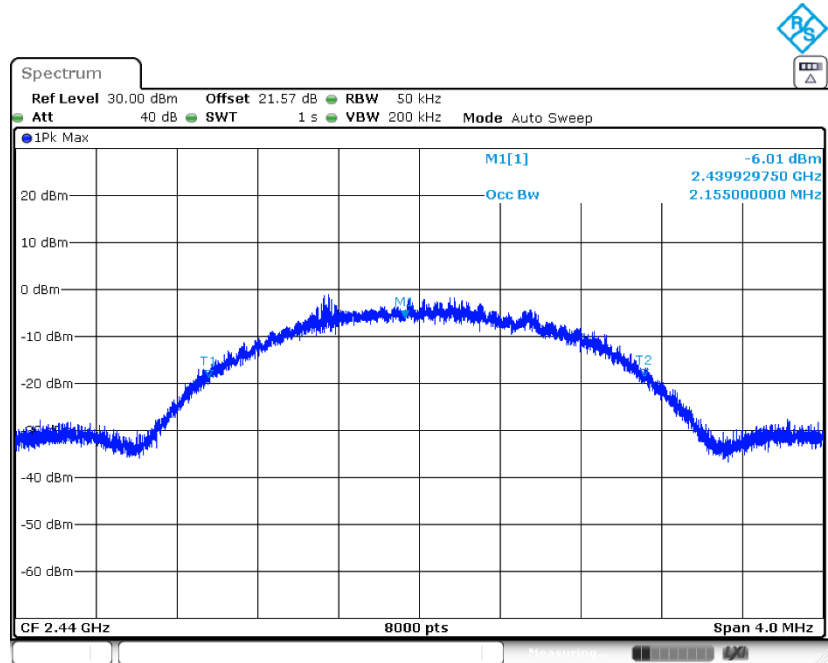
## 2402 MHz, 99% OBW



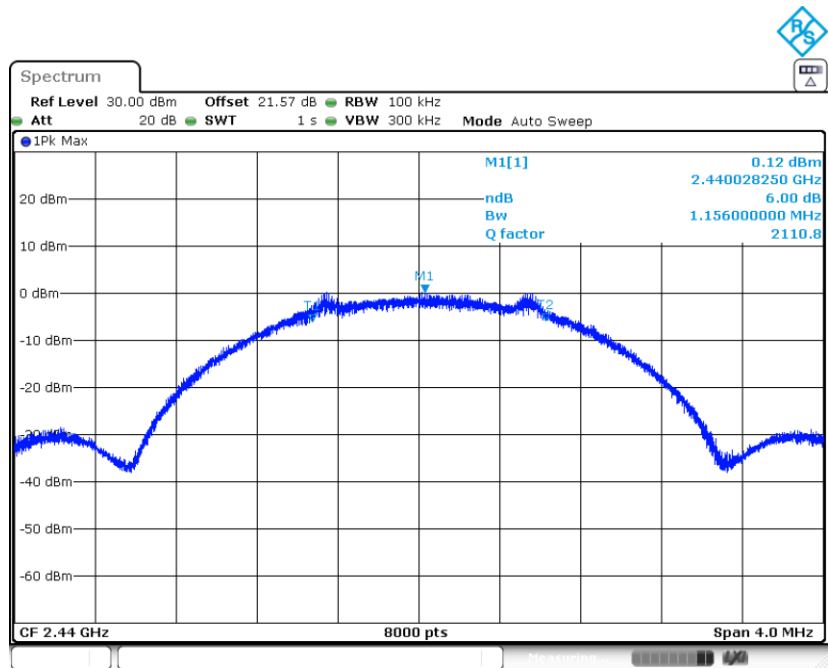
## 2402 MHz, -6 dB OBW



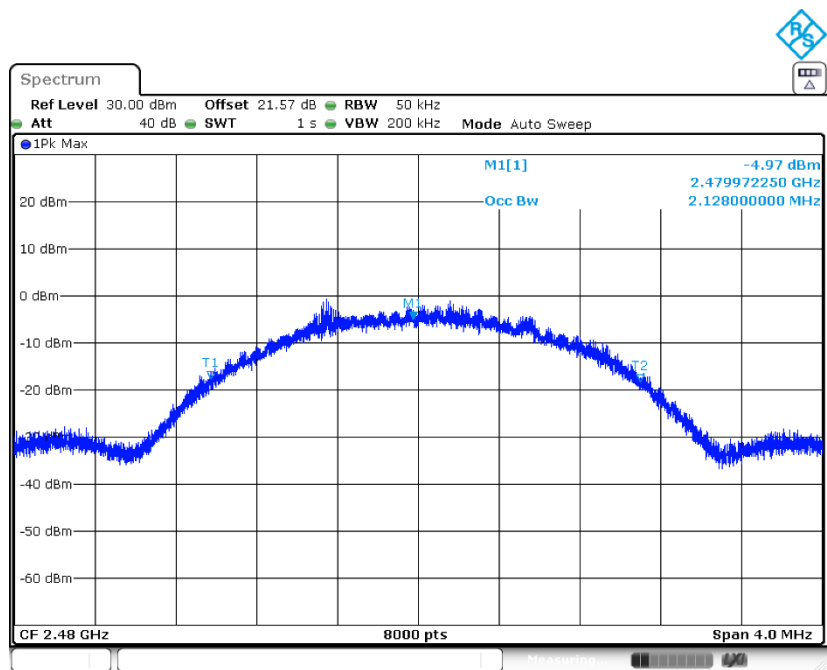
## 2440 MHz, 99% OBW



## 2440 MHz, -6 dB OBW

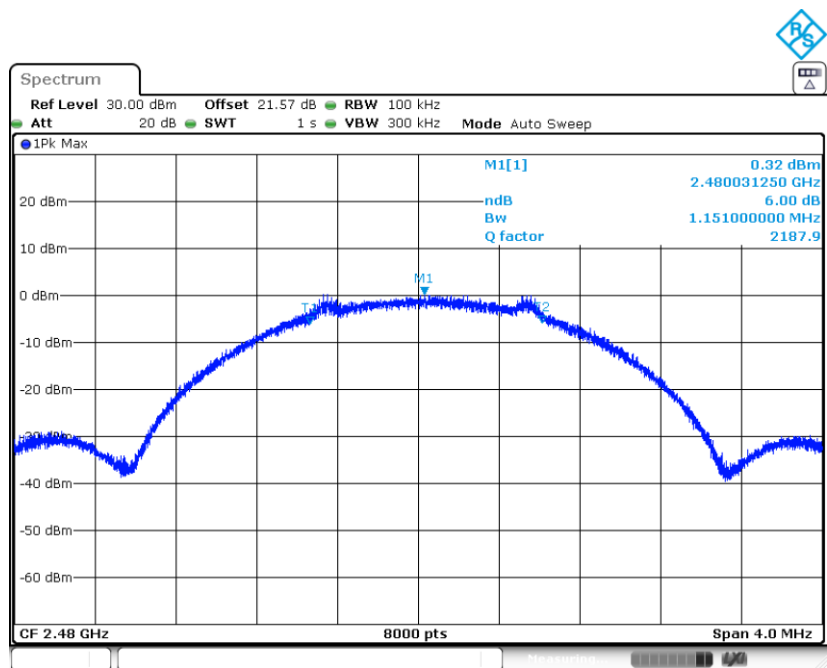


## 2480 MHz, 99% OBW



Date: 28.FEB.2023 14:04:11

## 2480 MHz, -6 dB OBW



Date: 28.FEB.2023 14:04:30

## 8 FCC §15.247(b) (3) & ISEDC RSS-247 §5.4 – Maximum Output Power

### 8.1 Applicable Standards

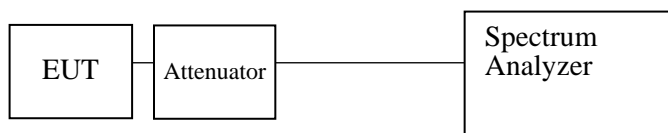
According to FCC §15.247(b) (3): For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

According to RSS-247 §5.4: For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

### 8.2 Measurement Procedure

The measurements are based on ANSI C63.10-2013, Section 11.9.1.1.

### 8.3 Test Setup Block Diagram



### 8.4 Test Equipment List and Details

BACL Number	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	2 years
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k39-101203-UW	2022-05-05	1 year
-	-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	10dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	RF cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator 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”.

## 8.5 Test Environmental Conditions

<b>Temperature:</b>	21° C
<b>Relative Humidity:</b>	39 %
<b>ATM Pressure:</b>	102.0 KPa

The testing was performed by Christian Schwartz on 2023-01-30 and 2023-02-28 at RF test site.

## 8.6 Test Results

### PHY1

Channel	Frequency (MHz)	Conducted Output Power (dBm)	FCC/ISED Limit (dBm)	EIRP (dBm)	EIRP Limit (dBm)
Low	2402	3.50	30	7.75	36
Middle	2440	3.09	30	7.34	36
High	2480	2.58	30	6.83	36

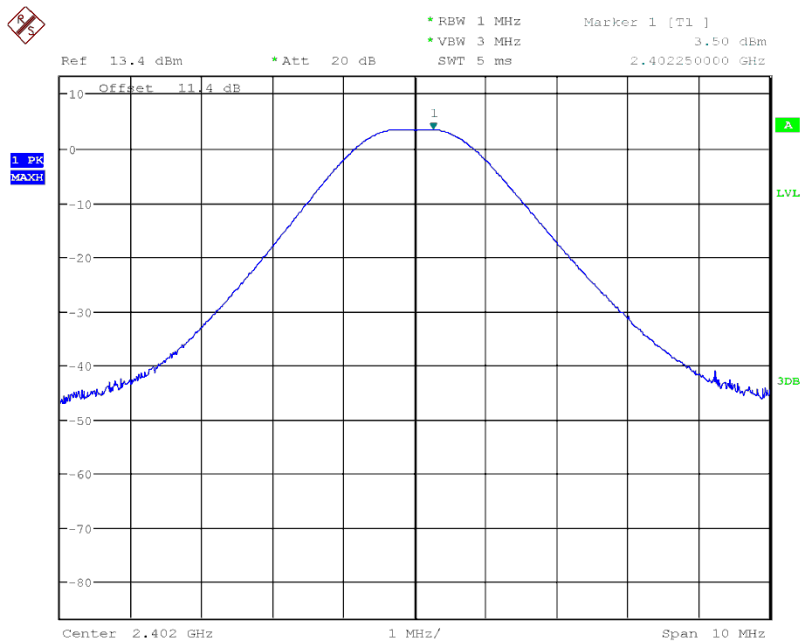
### PHY2

Channel	Frequency (MHz)	Conducted Output Power (dBm)	FCC/ISED Limit (dBm)	EIRP (dBm)	EIRP Limit (dBm)
Low	2402	1.72	30	5.97	36
Middle	2440	1.36	30	5.61	36
High	2480	1.70	30	5.95	36

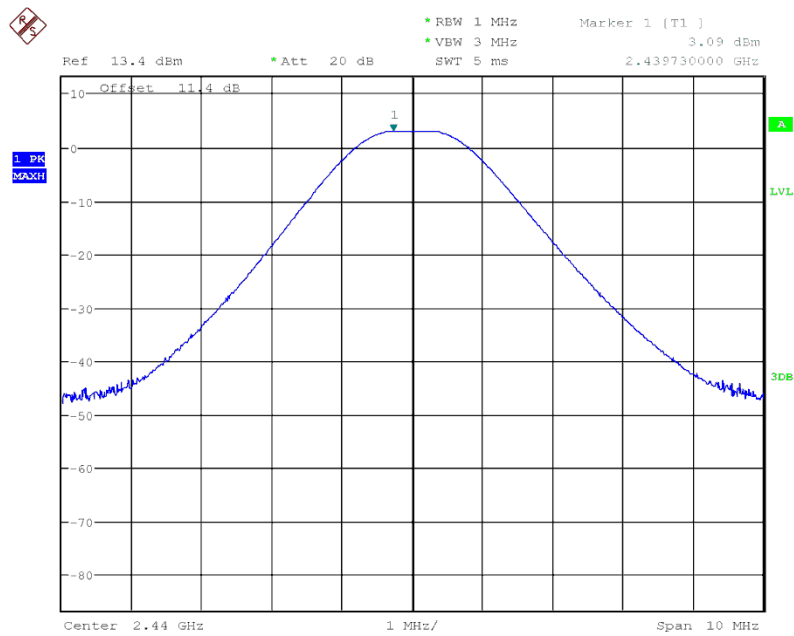
Note: EIRP (dBm) = Conducted Output Power (dBm) + Antenna Gain (dBi)

PHY1

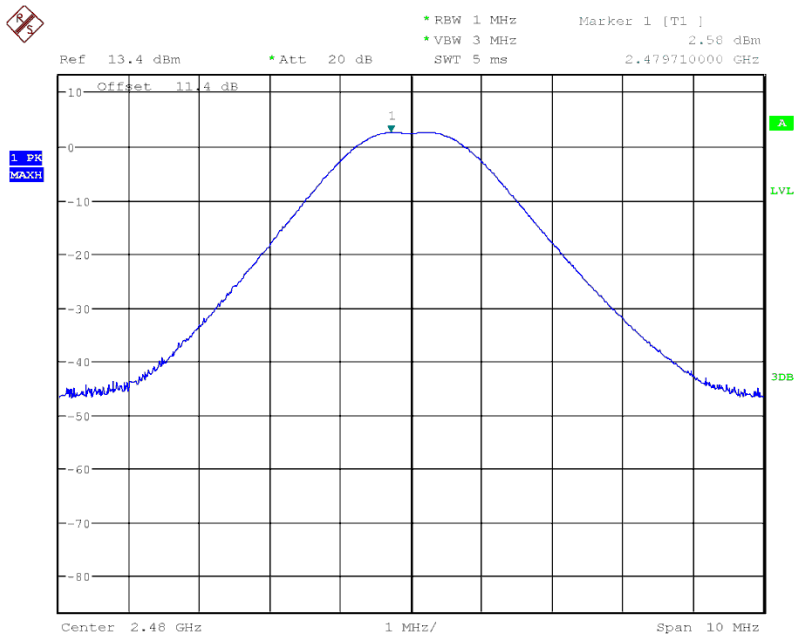
Low Channel: 2402 MHz



Middle Channel: 2440 MHz

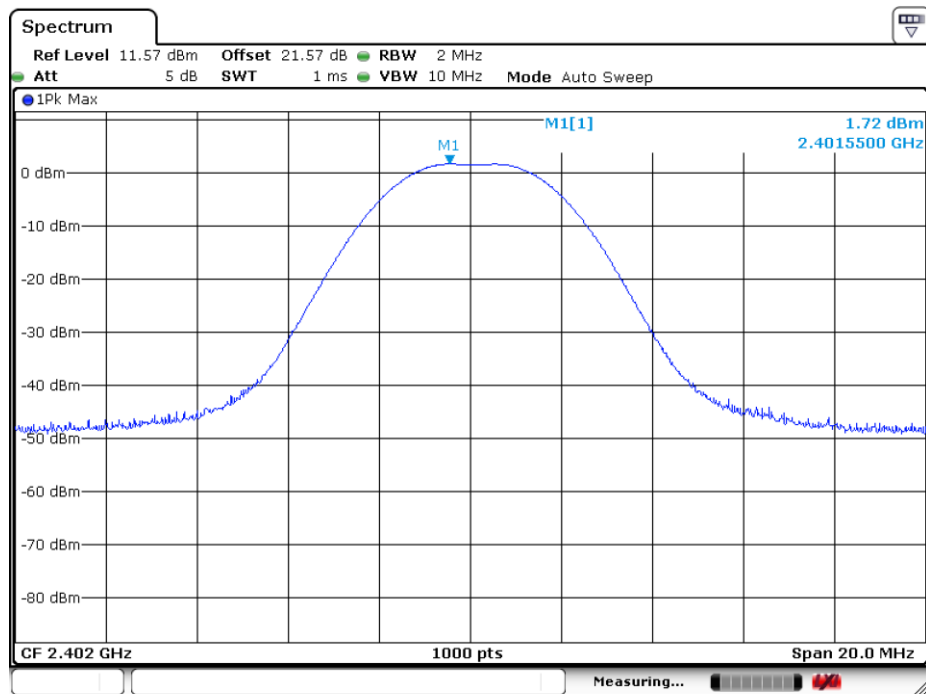


High Channel: 2480 MHz

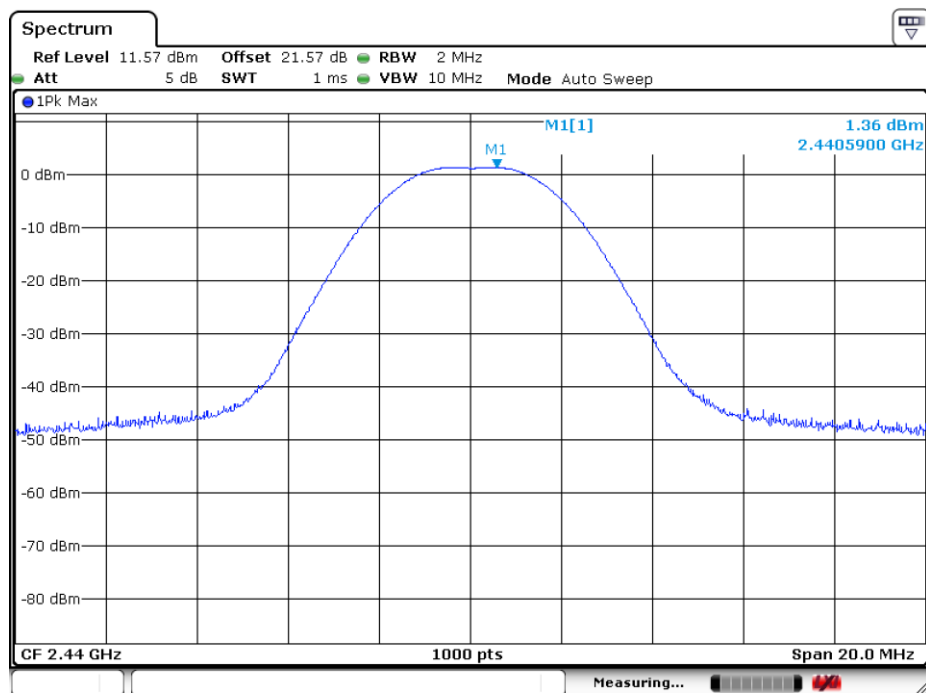


## PHY2

## Low Channel: 2402 MHz

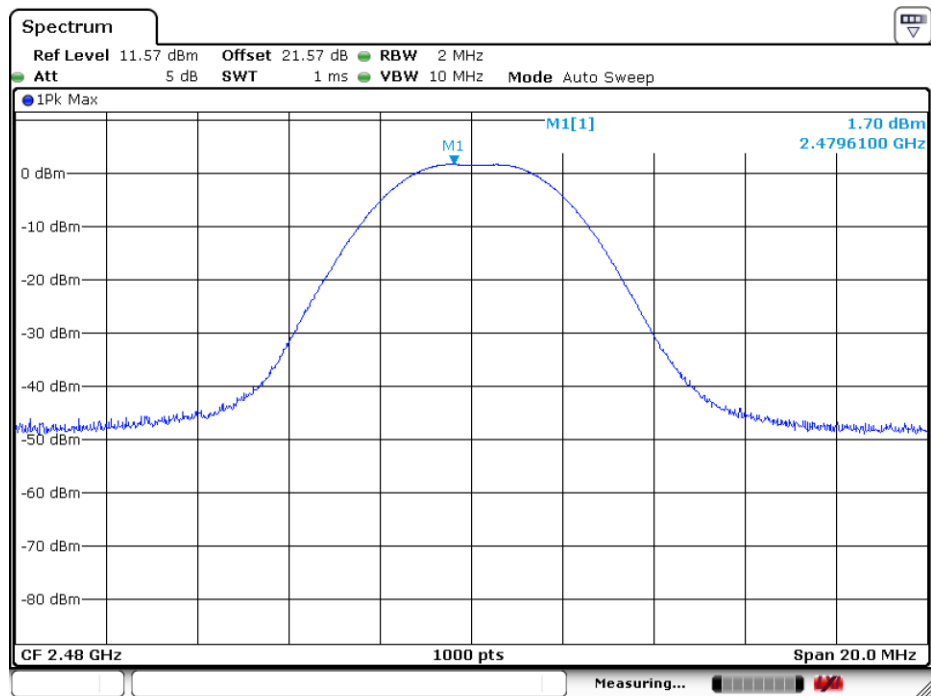


## Middle Channel: 2440 MHz





## High Channel: 2480 MHz



## 9 FCC §15.247(e) & ISEDC RSS-247 §5.2(2) – Peak Power Spectral Density

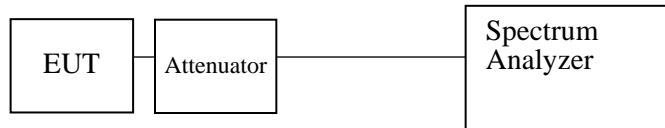
### 9.1 Applicable Standards

According to ECFR §15.247(e) and RSS-247 §5.2 (2) , for digitally modulated systems, 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.

### 9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 10: Maximum power spectral density level in the fundamental emission.

### 9.3 Test Setup Block Diagram



### 9.4 Test Equipment List and Details

BACL Number	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k3 9-101203-UW	2022-05-05	1 year
-	-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	10dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	RF cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator 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”.*

## 9.5 Test Environmental Conditions

<b>Temperature:</b>	23° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

The testing was performed by Christian Schwartz on 2023-01-30 and 2023-02-28 at RF test site.

## 9.6 Test Results

PHY1

Channel	Frequency (MHz)	Conducted PSD (dBm/3 kHz)	FCC/ISED Limit (dBm/3 kHz)
Low	2402	-7.75	8
Middle	2440	-8.21	8
High	2480	-8.80	8

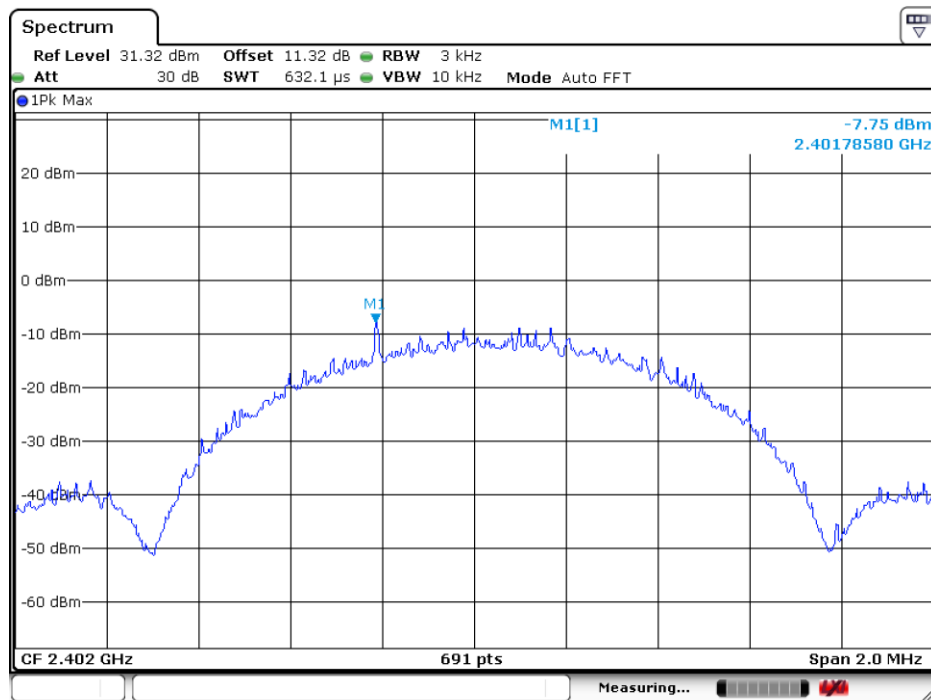
PHY2

Channel	Frequency (MHz)	Conducted PSD (dBm/3 kHz)	FCC/ISED Limit (dBm/3 kHz)
Low	2402	-11.30	8
Middle	2440	-11.61	8
High	2480	-11.45	8

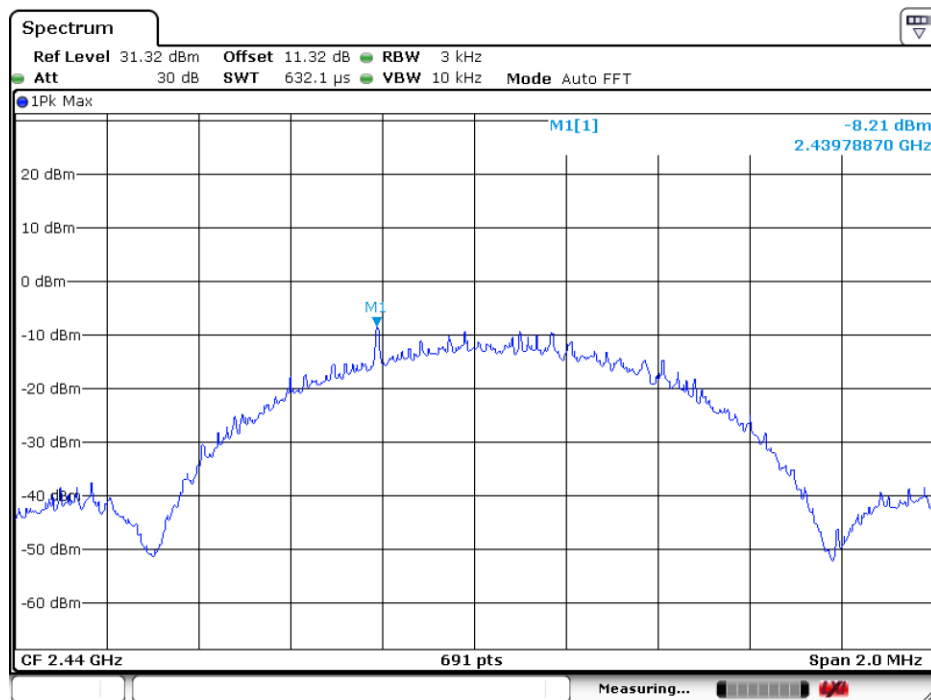
Please refer to the following measurement plots.

## PHY1

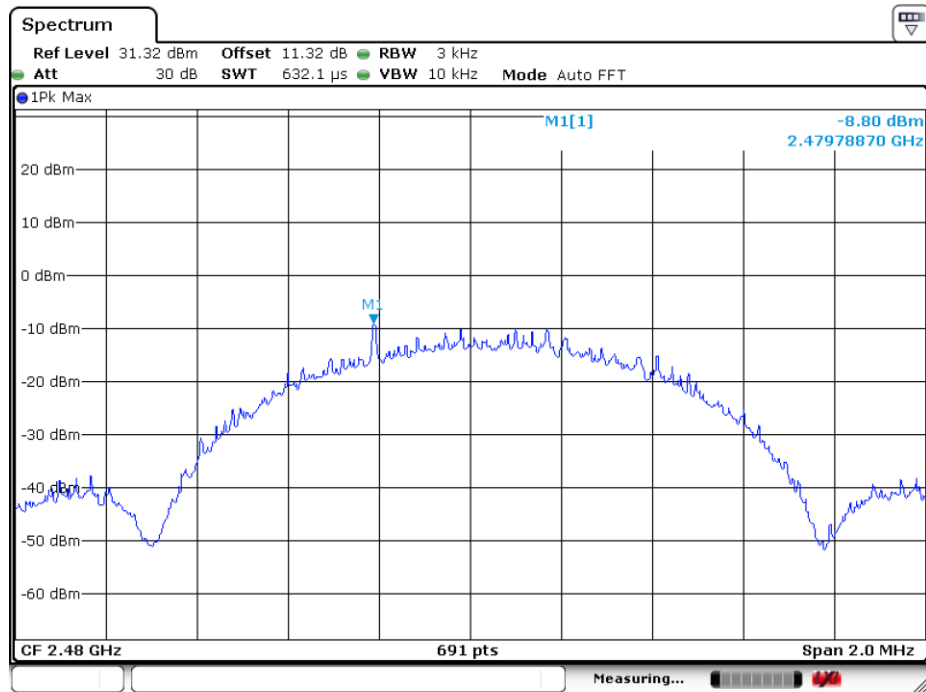
## Low Channel: 2402 MHz



## Middle Channel: 2440 MHz

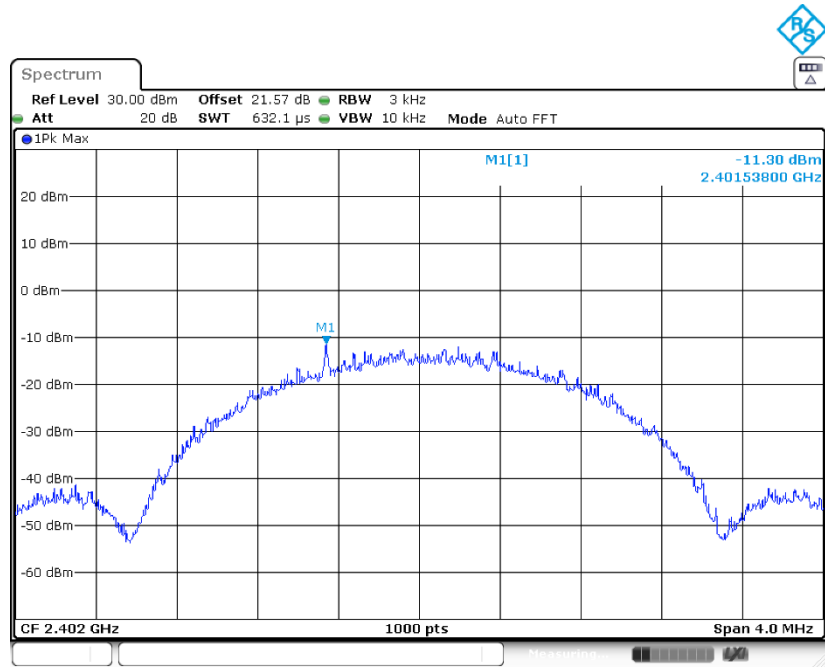


## High Channel: 2480 MHz



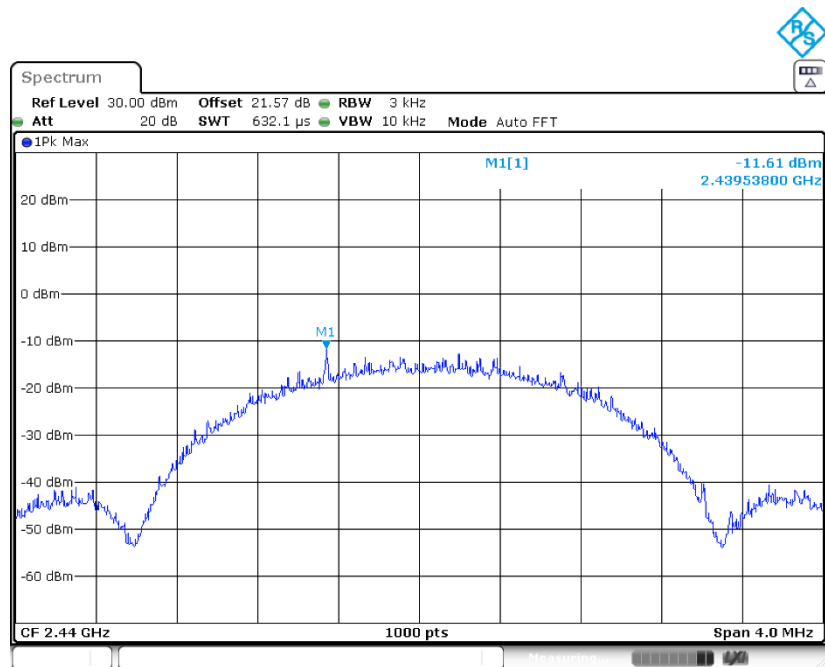
## PHY2

## Low Channel: 2402 MHz



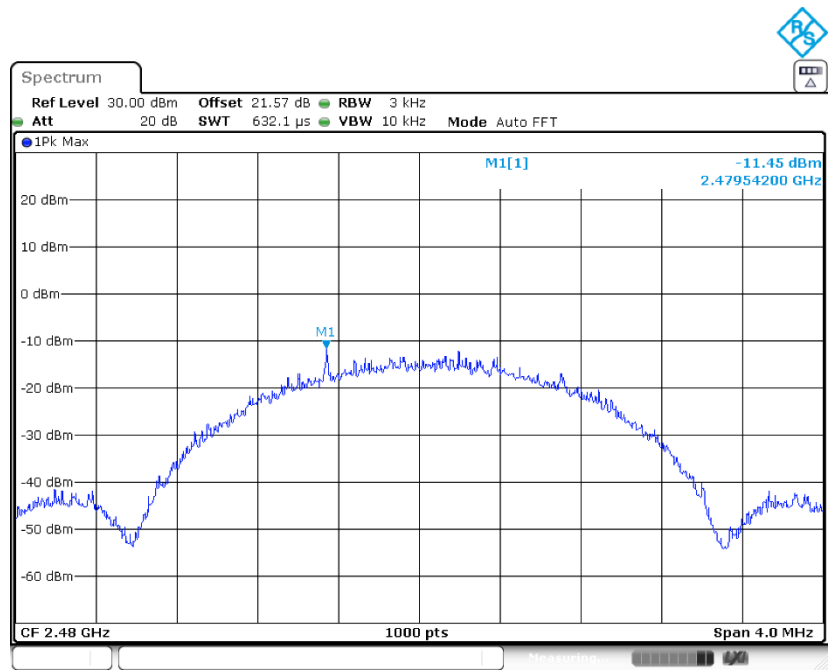
Date: 28.FEB.2023 13:53:55

## Middle Channel: 2440 MHz



Date: 28.FEB.2023 13:58:54

## High Channel: 2480 MHz



Date: 28.FEB.2023 14:04:47

## 10 FCC §15.247(d) & ISEDC RSS-247 §5.5 - 100 kHz Bandwidth of Band Edges

### 10.1 Applicable Standards

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator 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, based on either an RF conducted or a radiated measurement. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

According to ISEDC RSS-247 §5.5. In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

### 10.2 Measurement Procedure

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation

RBW = 100 kHz

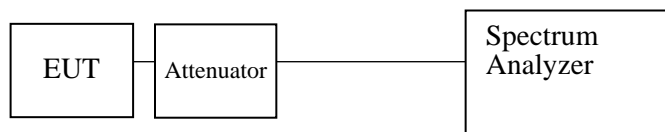
VBW = 300 kHz

Sweep = coupled

Detector function = peak

Trace = max hold

### 10.3 Test Setup Block Diagram





#### 10.4 Test Equipment List and Details

BACL Number	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	2 years
-	-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k3 9-101203- UW	2022-05-05	1 year
-	-	10dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	RF cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator 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".

#### 10.5 Test Environmental Conditions

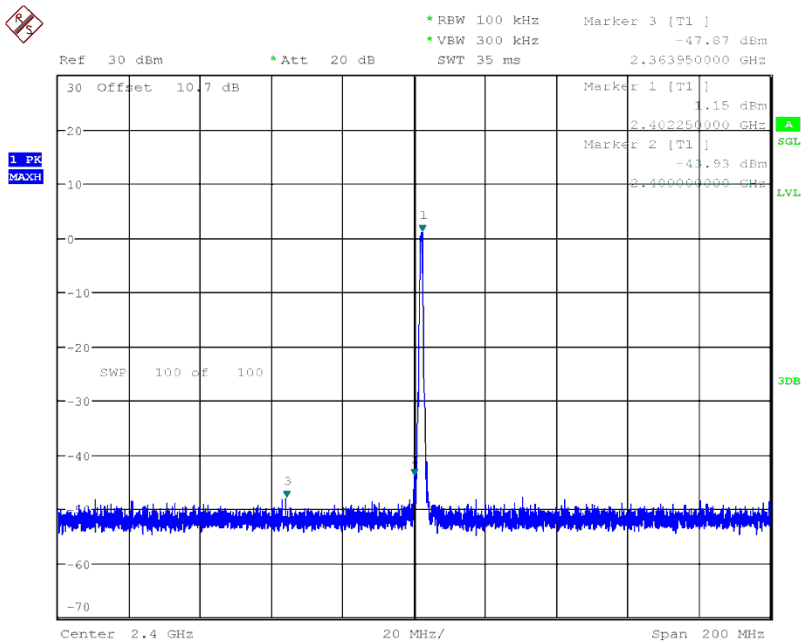
<b>Temperature:</b>	21° C
<b>Relative Humidity:</b>	39 %
<b>ATM Pressure:</b>	102.0 KPa

The testing was performed by Christian Schwartz on 2023-01-30 and 2023-02-28 at RF test site.

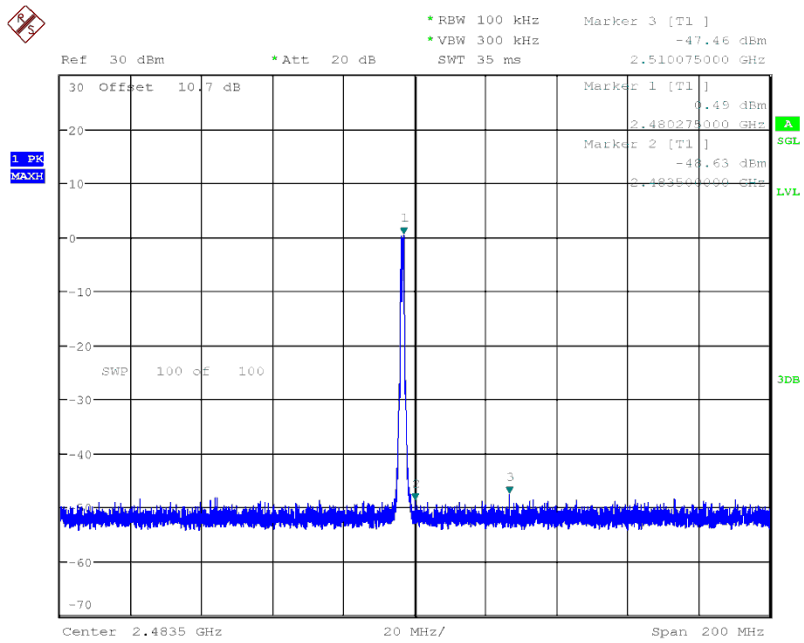
10.6 Test Results

PHY1

Low Channel: 2402 MHz

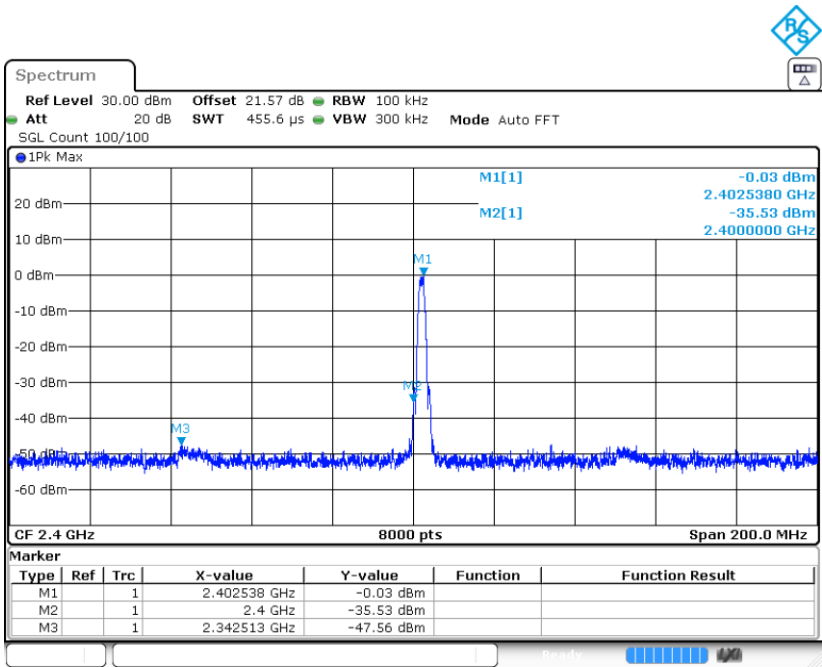


High Channel: 2480 MHz

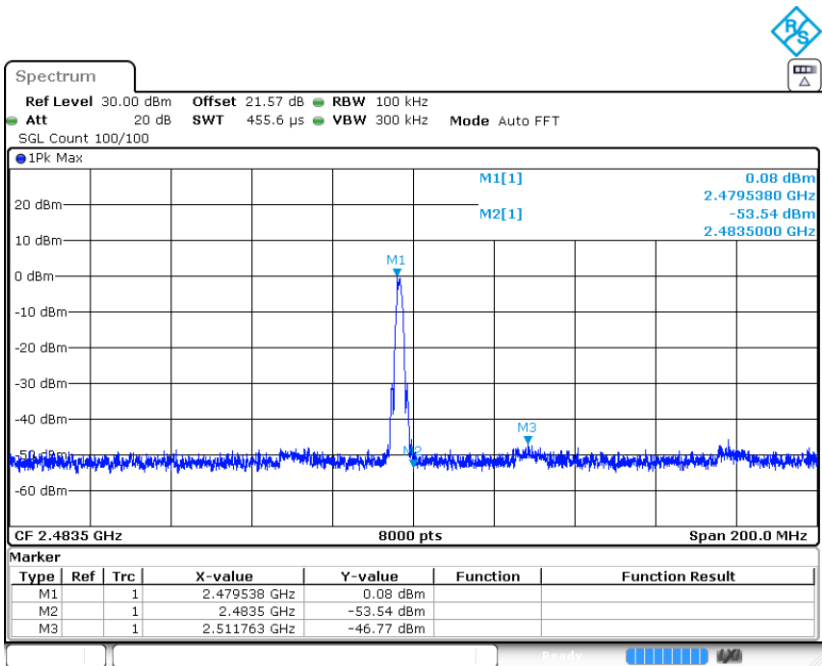


PHY2

Low Channel: 2402 MHz



High Channel: 2480 MHz



## 11 FCC §15.247(d) & ISEDC RSS-247 §5.5 - Spurious Emissions at Antenna Terminals

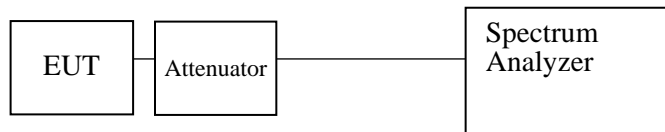
### 11.1 Applicable Standards

For FCC §15.247(d) and ISEDC RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator 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, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

### 11.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

### 11.3 Test Setup Block Diagram



### 11.4 Test Equipment List and Details

BACL Number	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	2 years
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k3 9-101203-UW	2022-05-05	1 year
-	-	20dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	10dB attenuator	-	-	Each time <sup>1</sup>	N/A
-	-	RF cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator 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".

## 11.5 Test Environmental Conditions

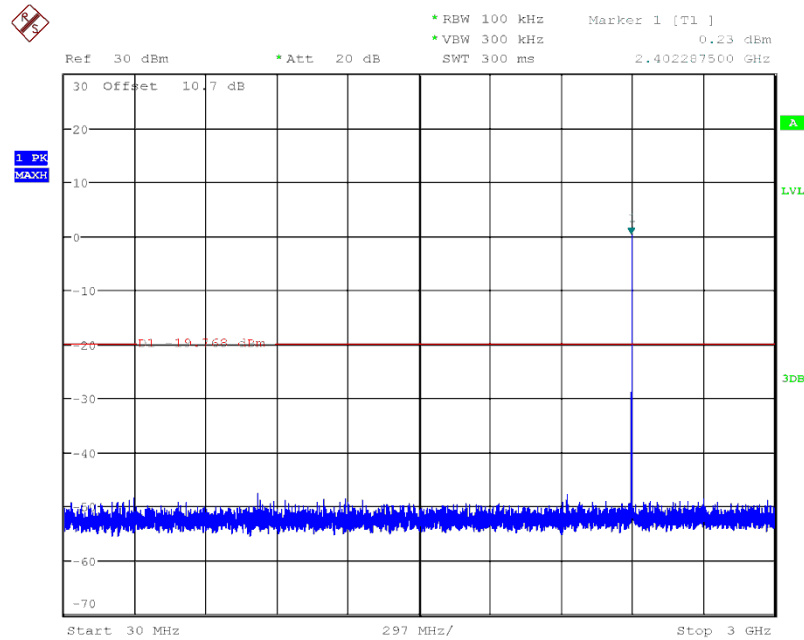
<b>Temperature:</b>	21° C
<b>Relative Humidity:</b>	39 %
<b>ATM Pressure:</b>	102.0 KPa

*The testing was performed by Christian Schwartz on 2023-01-30 and 2023-02-28 at RF test site.*

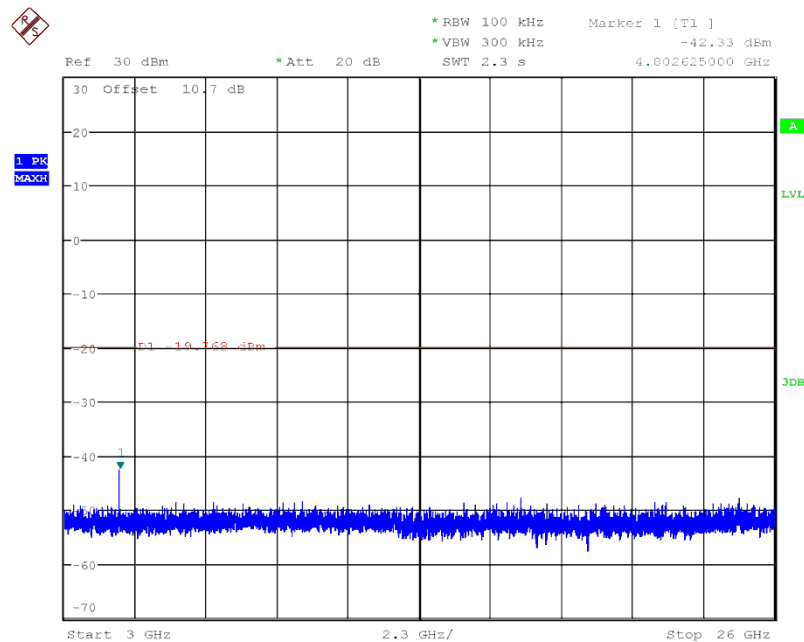
## 11.6 Test Results

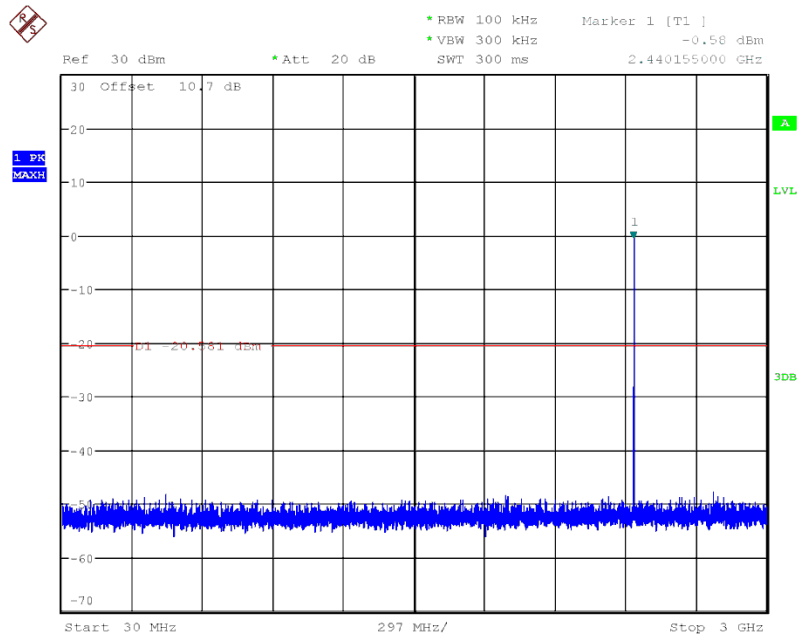
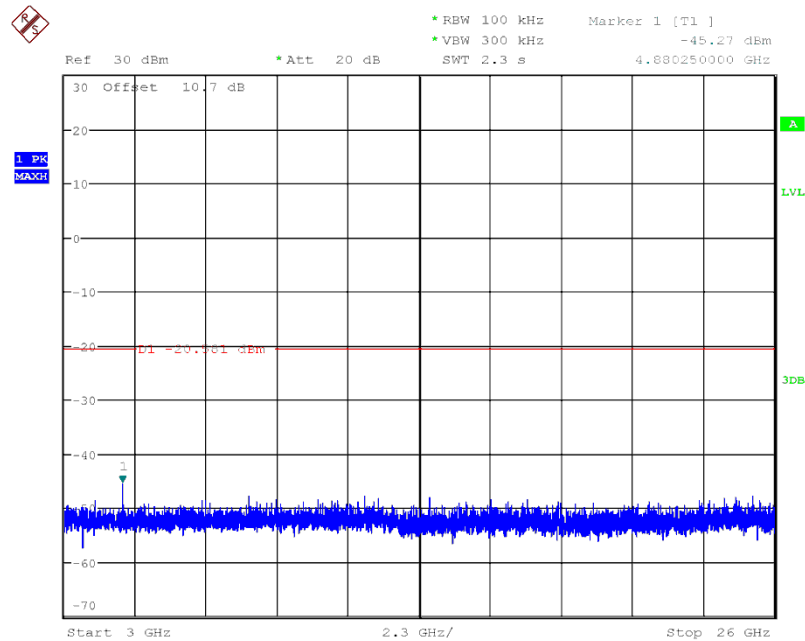
### PHY1

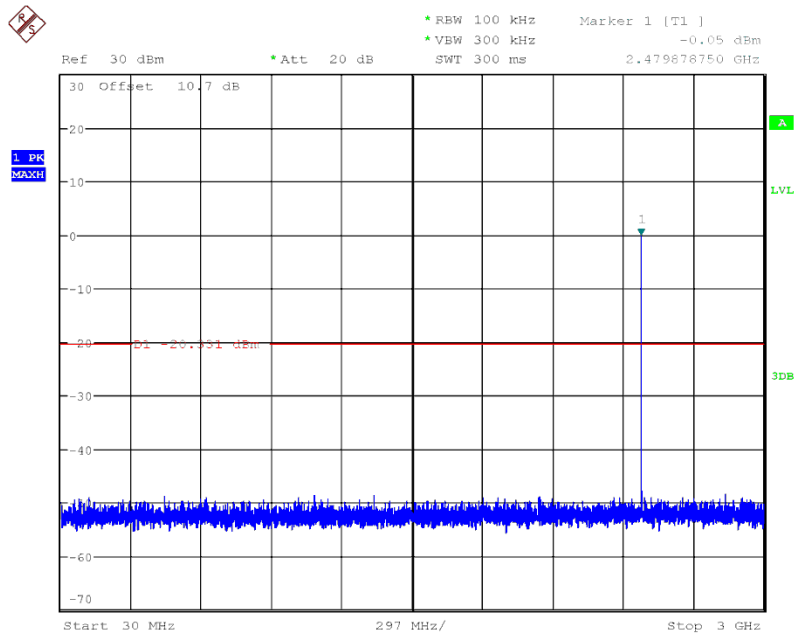
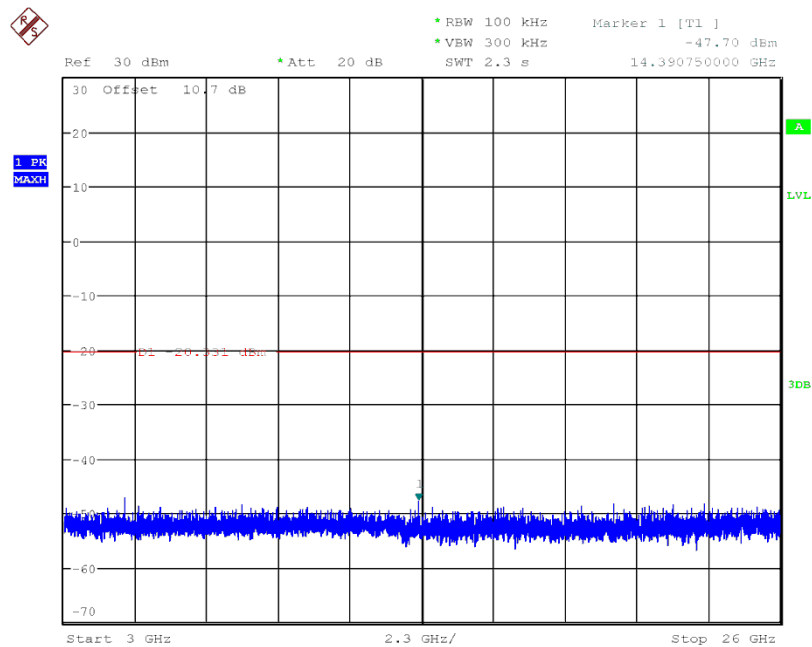
#### Low Channel: 2402 MHz 30MHz-3000MHz



#### Low Channel: 2402 MHz 3000MHz-26000MHz



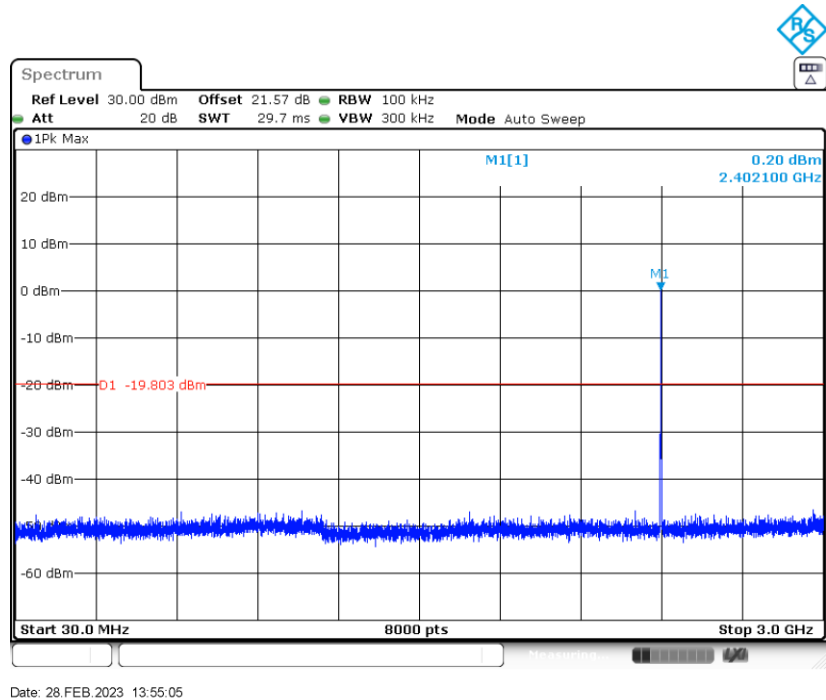
**Middle Channel: 2440 MHz 30MHz-3000MHz****Middle Channel: 2440 MHz 3000MHz-26000MHz**

**High Channel: 2480 MHz 30MHz-3000MHz****High Channel: 2480 MHz 3000MHz-26000MHz**

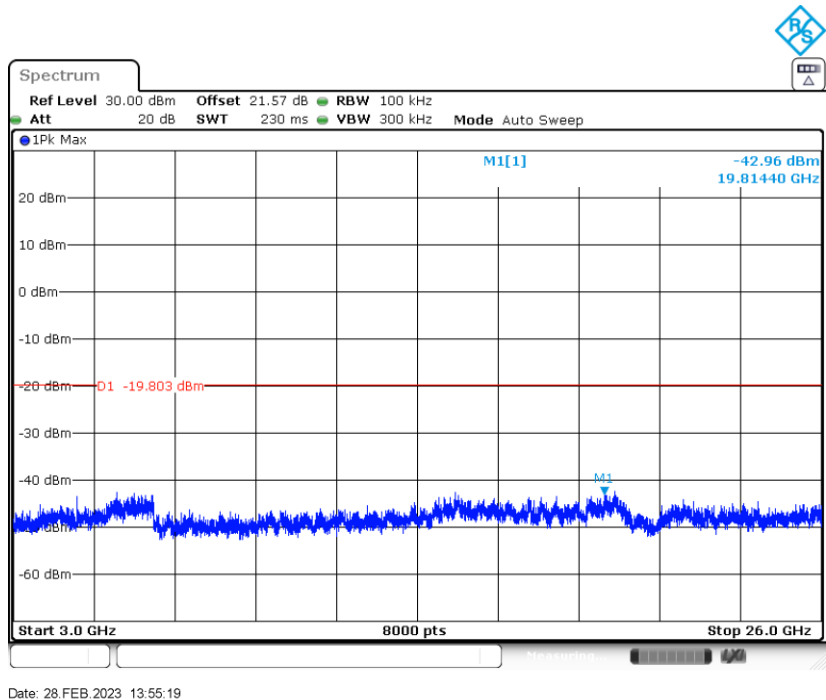


## PHY2

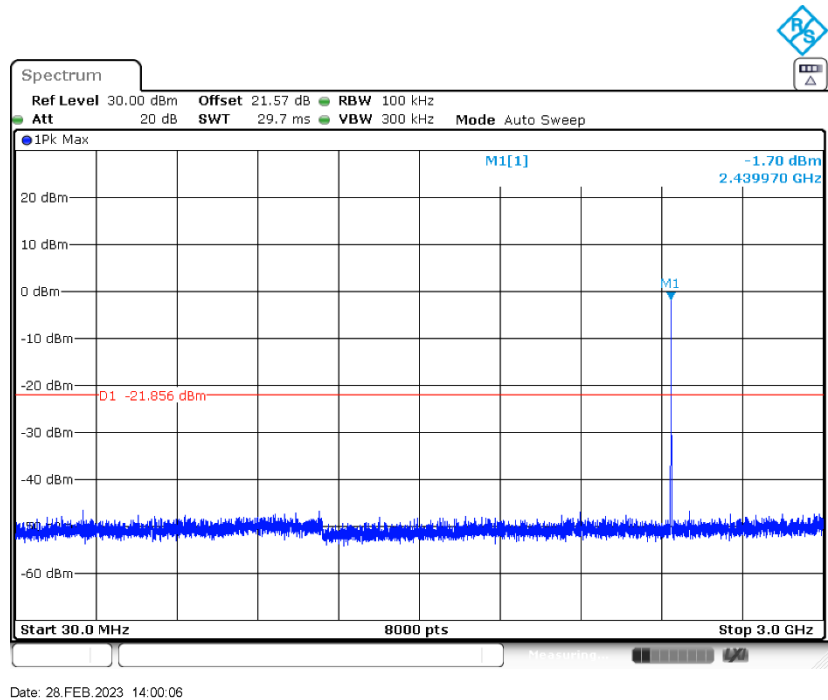
## Low Channel: 2402 MHz 30MHz-3000MHz



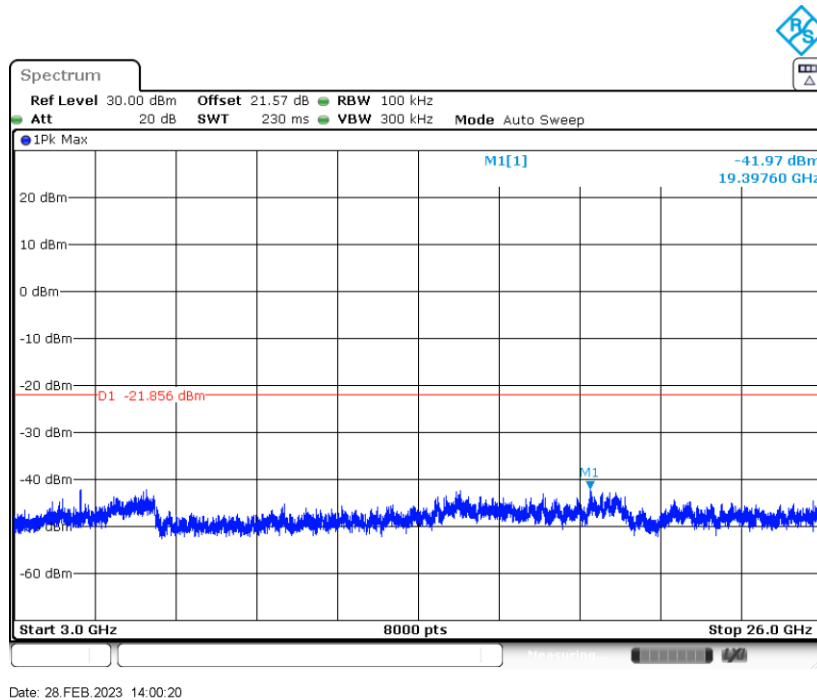
## Low Channel: 2402 MHz 3000MHz-26000MHz

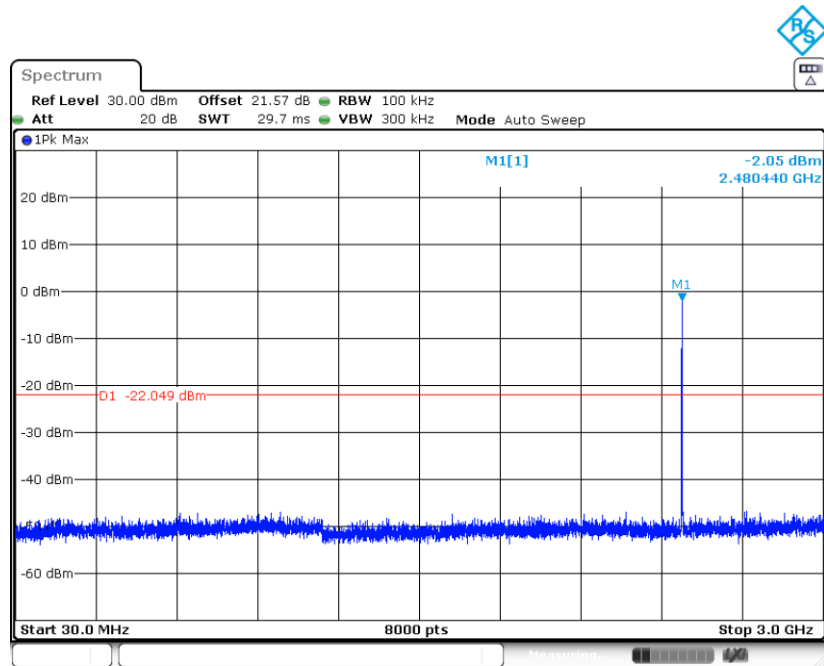


## Middle Channel: 2440 MHz 30MHz-3000MHz

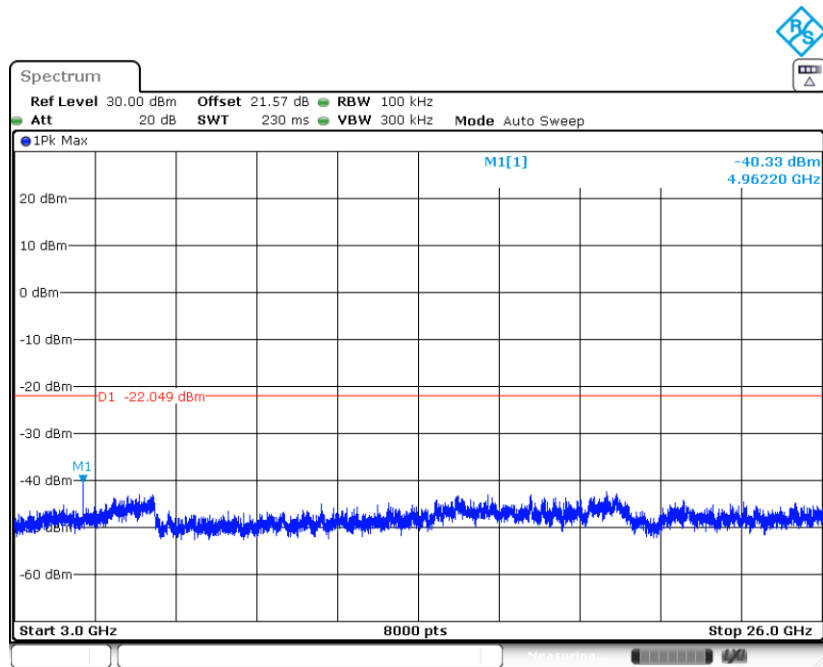


## Middle Channel: 2440 MHz 3000MHz-26000MHz



**High Channel: 2480 MHz 30MHz-3000MHz**

Date: 28.FEB.2023 14:05:58

**High Channel: 2480 MHz 3000MHz-26000MHz**

Date: 28.FEB.2023 14:06:12

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## **12 Annex A (Normative) - Test Setup Photographs**

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Please refer to the attachment

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## **13 Annex B (Normative) - EUT External Photographs**

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Please refer to the attachment

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## **14 Annex C (Normative) - EUT Internal Photographs**

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Please refer to the attachment

**15 Annex D (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 21<sup>st</sup> day of December 2022.

A blue ink signature of Mr. Trace McInturf.

Mr. Trace McInturf, Vice President, Accreditation Services  
For the Accreditation Council  
Certificate Number 3297.02  
Valid to September 30, 2024

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 ---**