

# Test Report 2024-168

**Version A**

**Issued 18 Nov 2024**

**Project GCL-0648**

**Model Identifier: AA4999**

**Primary Test Standard(s):**

CFR 47, FCC Part 15.247

RSS-247 Issue 3

## Garmin Compliance Lab

Garmin International

1200 E 151<sup>st</sup> Street

Olathe Kansas 66062 USA

### Client-supplied Information

FCC ID: IPH-A4999  
IC ID: 1792A-A4999



**See section 6 of this report regarding the presence or absence of accreditation logos or marks on this cover page.**

## 1. Summary

The equipment or product described in section 5 of this report was tested at the Garmin Compliance Lab according to standards listed in section 6. This report focuses on the 2.4 GHz Bluetooth Low Energy (BLE) transceiver. The results are as follows.

Parameter	Description	Key Performance Values	Result	Data starts at page
Radio Modulation	Summary of the kinds of communication this radio can achieve, as stated by the client. [RSS-GEN at Annex A item 10b]	Digitally modulated spread spectrum at rates as high as 2 Mbps.	Reported	N/A
Hopping Channels	The radio manages its use of channels appropriately. [15.247(a)(1); RSS-247 at 5.1]	N/A. The radios described in this report are not subjected to the Frequency Hopping rules.	N/A	N/A
DTS Bandwidth	The nature of the radio signal is broadband, being at least 500 kHz wide. [15.247(a)(2); RSS-247 at 5.2(a)]	The 6dB bandwidth is 695 kHz or greater.	PASS	15
Other Bandwidths	Regulatory agencies also require the reporting of signal bandwidths using alternate processes. [2.202; RSS-GEN at 6.7]	These values are reported but have no actual performance requirements.	Reported	17
Transmit Power	The peak transmit power presented to the antenna is no greater than 1 Watt or 30 dBm. The effective radiated power is limited to 4 Watts or 36 dBm EIRP. [15.247(b); RSS-247 at 5.4(d)]	The maximum transmit power is 2.6 dBm or 1.8 mW.	PASS	22
Antenna Gain	The radio should not focus too much energy in any direction. Unless additional rules are applied, the antenna gain is no greater than 6 dBi. [15.247(b)(4) and (c)]	NT. The client stated that the antenna gain was -0.35 dBi and will document antenna gain separately.	NT	NT
Unwanted Emissions (Conducted Spurious)	The radio should not provide too much radio energy to the antenna at frequencies beyond its intended frequency band. [15.247(d); RSS-247 at 5.5]	Emissions outside the band must be reduced at least 30 dB from in-band levels. The measured reduction was at least 56 dB.	PASS	25
Restricted Bands	The radio must not emit in certain designated restricted frequency bands above a set of limit values. [15.247(d) and 15.205; RSS-247 at 3.3]	Emissions in the restricted bands were at least 12.3 dB below the applicable limits.	PASS	29

Power Spectral Density	The radio must not focus too much radio energy in a narrow frequency band. [15.247(e); RSS-247 at 5.2(b)]	The limit is 8 dBm in a 3 kHz band. The strongest emission level was -13.8 dBm in a band of at least 3 kHz.	PASS	34
Hybrid Systems	A radio that is both frequency hopping and digitally modulated should satisfy a combination of system rules. [15.247(f); RSS-247 at 5.3]	N/A. The radios described in this report are not subjected to the Hybrid System rules.	N/A	N/A
Frequency Hopping Rules	Frequency hopping systems have additional functional requirements. [15.247(g) and (h); RSS-247 at 5.1]	N/A. The radios described in this report are not subjected to the Frequency Hopping rules.	N/A	N/A
Radio Safety	The radio emissions must meet public health & safety guidelines related to human exposure. [15.247(i) and 1.1307; RSS-Gen at 3.4]	NT. Client will report radio energy safety results separately.	NT	NT
Unwanted Emissions (Radiated Spurious)	While transmitting, the radiated emissions must not be too strong. [15.209, RSS-Gen at 8.9]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 10 dB of margin.	PASS	36
Unwanted Emissions (Mains Conducted)	While transmitting, the emissions conducted into the power mains must not be too strong. [15.207, RSS-Gen at 8.8]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 19 dB of margin.	PASS	52

**NT** (Not Tested) means the requirement may or may not be applicable, but the relevant measurement or test was not performed as part of this test project.

**N/A** (Not Applicable) means the lab judged that the test sample is exempt from the requirement.

#### Table 1: Summary of results

#### Report Organization

For convenience of the reader, this report is organized as follows:

1. Summary
2. Test Background
3. Report History and Approval
4. Test Sample Modifications and Special Conditions
5. Description of Equipment Tested
6. Test Standards Applied
7. Measurement Instrumentation Uncertainty
8. Selected Examples of Calculations
9. Environmental Conditions During Test
10. Immunity Performance Criteria
11. 3m RF Chamber Block Diagrams

Annex: Test records are provided for each type of test, following the order and page numbering stated in the summary table. Concluding notes appear on the final page of this report.

Due to confidentiality, certain material (such as test setup photographs) has been removed from this report and placed in GCL Test Report 2024-173 That report is treated as a part of this document by way of this reference.

## 2. Test Background

### 2.1 The Test Lab

The testing reported here was performed at the Garmin Compliance Lab, an organization within Garmin International, located at 1200 E 151<sup>st</sup> St, Olathe Kansas, USA. The contact telephone number is +1.913.397.8200.

### 2.2 The Client

The testing was performed on behalf of the Garmin design group, a separate organization located at 1200 E 151<sup>st</sup> St, Olathe Kansas, USA. Witnesses from the business group included: None.

### 2.3 Other Information

Test Sample received: 09 Aug 2024

Test Start Date: 28 Aug 2024

Test End Date: 11 Nov 2024

The data in this test report apply only to the specific samples tested.

Upon receipt all test samples were believed to be properly assembled and ready for testing.

## 3. Report History and Approval

This report was written by Andy Heier and initially issued on 18 Nov 2024 as Version A.

### Report Technical Review:

David Arnett  
Technical Lead EMC Engineer



### Report Approval:

Shruti Kohli  
Manager Test and Measurement (EMC, Reliability and Calibration)



#### 4. Test Sample Modifications and Special Conditions

The following special conditions or usage attributes were judged during test to be necessary to achieve compliance with one or more of the standards listed in section 6 of this report:  
None

The following modifications to the test sample(s) were made, and are judged necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

##### Modification 1

Detailed Description: Sample E1's (s/n 483183122) firmware was rolled back from version 1.03 to 1.01.

Date applied: 25-Sept-2024 at 9:30am

Reason for this modification: Recover the "Accessories" menu to enable pairing with companion heart rate monitor for Rx blocking test.

The following tests were performed without this modification being present, and the presence or absence of the modification is judged by the lab and client to have no significant effect on these specific tests: Transmit Power, DTS Bandwidth, Occupied Bandwidth, Power Spectral Density, Conducted Spurious Emissions, AC Mains Conducted Emissions, and Radiated Emissions.

## 5. Description of the Equipment Tested

### 5.1 Unique Identification

Product Model	AA4999
Serial Numbers Tested	Initial Group: 483183122, 483183211 Updated Group: None for this report

This product tested is a mobile device for collecting and sharing data with the user and nearby electronic devices.

The client delivered an initial group of test samples and affirmed that the test samples will be representative of production in all relevant aspects. However, prior to the start of testing the client identified design changes that would be needed in the 13.56 MHz NFC transceiver. The client stated that a second group of test samples would be provided with these design updates implemented. The client stated that the non-NFC transceivers in the initial group are representative of production and asked GCL to begin testing using those samples. This report may contain compliance data that was taken in non-NFC operating modes with samples from this initial group. The second group of NFC-updated samples was delivered to GCL on 04 November 2024. GCL only performed NFC-focused tests on samples from that updated group. The client affirmed that the test samples in this updated group will be representative of production in all relevant aspects.

### 5.2 Key Parameters

EUT Input Power:	5 Vdc
I/O Ports:	USB
Radio Transceivers:	Bluetooth Low Energy, NFC
Radio Receivers:	GPS L1, Galileo E1, BeiDou, GLONASS
Primary Functions:	Data collection and communication
Typical use:	Portable in multiple orientations
Highest internal frequency:	2.484 GHz
Firmware Revision	1.03, 1.01 (see section 4)

### 5.3 Operating modes

During test, the EUT was operated in one or more of the following modes.

Mode 3: M3 (Ble Tx). Bluetooth Low Energy radio transmitting consistently on a selected channel at 1 Mbps or 2 Mbps

Mode 4: M4 (Ble Lnk). Bluetooth Low Energy radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.

Mode 12: M12 (NfcLnk). The NFC 13.56 MHz transceiver is in Card Emulation mode, and is actively linked to a companion NFC Reader.

Mode 13: M13 (GNSS). The Global Navigation Satellite System receiver is monitoring the GNSS bands, attempting to detect a constellation and determine location. Unless otherwise noted, the EUT was provided simulated GNSS signals representing one of more constellation types. In addition, the EUT may have been reporting signal levels and satellite data to an attached computer to monitor link health.

Mode 14: M14 (NfcIdle). The NFC 13.56 MHz transceiver is powered, but not actively linked to a companion device.

Mode 16: M12 (NfcTag). The NFC 13.56 MHz transceiver is in Card Reader mode, and is actively linked to a companion NFC Tag.

Mode 19: M19 (ML1). Multiple link, combining modes M12 & M13. The EUT is actively linked to a NFC card reader and the specified satellite system, used for immunity tests.

5.4 EUT Arrangement

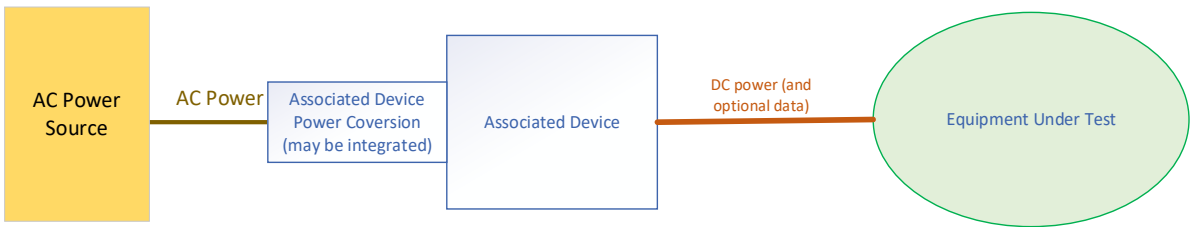
During test, the EUT components and associated support equipment were selected including the following arrangement sets.

Arrangement 1: A1 (Solo). The test sample operates from its battery and no external physical connections. No block diagram is needed for this arrangement.

Arrangement 2: A2 (Upwr). The test sample is attached to a Mains-powered device connected that provides dc power to the sample over a cable but no user data. See the block diagram in Figure 1.

Arrangement 3: A3 (Udata). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and user data over a cable. See the block diagram in Figure 1.

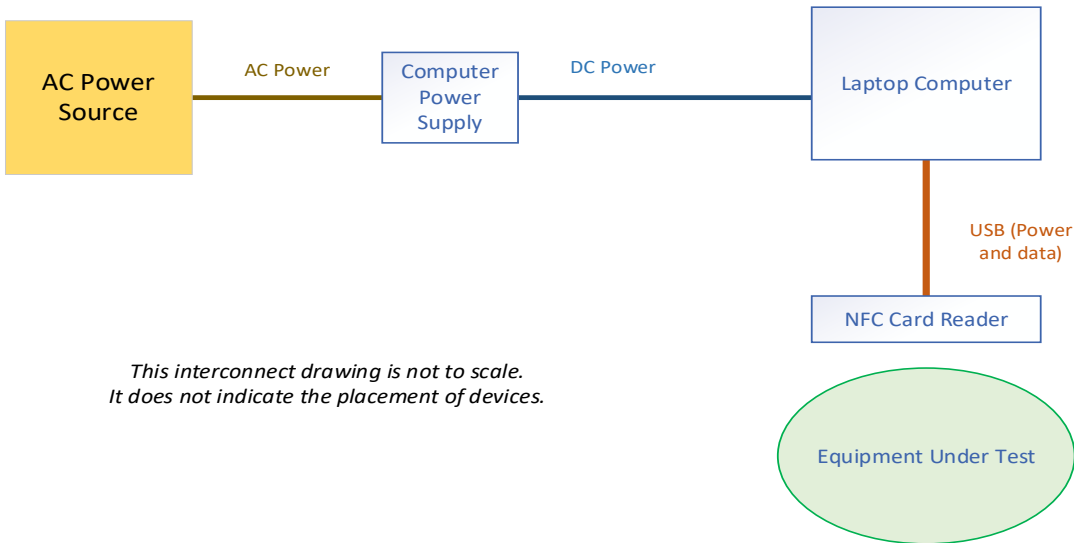
Arrangement 4: A4 (Udc). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and may or may not provide user data. This arrangement is specified in the test plan to provide staff flexibility when the presence or absence of data on the cable is not pertinent. See the block diagram in Figure 1.



*This interconnect drawing is not to scale.  
It does not indicate the placement of devices.*

Figure 1: Block diagram of equipment arrangements A2, A3, A4

Arrangement 6: A6 (NFCu). The test sample is powered via internal battery and actively linked to a NCR reader powered by a laptop PC.

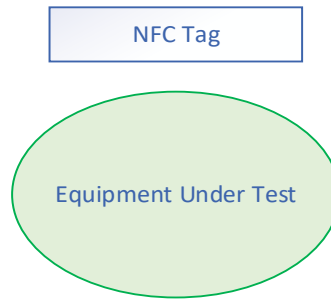


*This interconnect drawing is not to scale.  
It does not indicate the placement of devices.*

Figure 2: Block diagram of equipment arrangement A6

Arrangement 7: A7 (NFCu). The test sample is powered via internal battery and actively linked to a passive NFC tag.

*This interconnect drawing is not to scale.  
It does not indicate the placement of devices.*



**Figure 2: Block diagram of equipment arrangement A7**

### 5.5 Associated Equipment (AE) used

Description	Manufacturer	Model	Serial/Part Number
USB C power adaptor	Phihong (Garmin)	AQ27A-59CFA	362-00118-00
Tablet	Apple	iPad Pro 11 inch	DMPZ7582KD6L
Laptop	Dell	Latitude 5410	5VSPFB3
Power Supply	Dell	HA65NM191	0BD-7TC0-A02
Phone	Samsung	SM-G973U (S10)	RF8MC0W9XVR
NFC Card Reader	ACS	ACR1252U-M1	RR554-118449
NFC Tag	NXP	NTAG210μ	04:11:CC:AA:8F:51:81
Auxiliary Device	Garmin	A04999	3423419439

**Table 2: List of associated equipment that may have been used during test**

### 5.6 Cables used

Description	From	To	Length	EMC Treatment
USB C to custom cable	Power and/or Data source	EUT	0.5m	None

**Table 3: List of cables that may have been used during test**



## 6. Test Standards Applied

### 6.1. Accredited Standards

The following test or measurement standards were applied and are within the scope of the lab's accreditation. All results in this report that cite these standards are presented as Accredited results consistent with ISO/IEC 17025.

CFR 47, FCC Part 15, Subpart C  
ANSI C63.10: 2020 and ANSI C63.10: 2020 +Cor 1: 2023  
AS/NZS 4268: 2017  
RSS-GEN Issue 5 Amd 2  
RSS-247 Issue 3

### 6.2 Non-accredited Standards

The following test or measurement standards were applied and are either outside the scope of the lab's accreditation, or were performed in such a way that results are not presented as being fully accredited.

FCC Part 2.202  
TRC-43 Issue 3

### 6.3 Variances

The following variances were applied to standards cited in this section.

Where different test standards cover the same test parameter or phenomenon, and the standards have compatible differences, the stricter of the requirements is typically applied. For example, a consolidated limit may be applied to emission tests selecting the strictest of the limits at each frequency. Likewise, if one standard requires a vertical antenna sweep with bore sighting and another does not, swept motion with bore sighting will typically be used as it is the more stringent requirement.

### 6.4 Laboratory Accreditation

The Garmin Compliance Lab, an organization within Garmin International, is registered with the US Federal Communication Commission as US1311. The lab is recognized by the Canada Department of Innovation, Science, and Economic Development (ISED) under CAB identifier US0233.

The Garmin Compliance Lab, an organization within Garmin International, is accredited by A2LA, Certificate No. 6162.01. The presence of the A2LA logo on the cover of this report indicates this is an accredited ISO/IEC 17025 test report. If the logo is absent, this report is not issued as an accredited report. Other marks and symbols adjacent to the A2LA logo are accreditation co-operations of which A2LA is a member under a mutual recognition agreement, and to which the Garmin Compliance Lab has been sublicensed.

## 7. Measurement Instrumentation Uncertainty

The lab has analyzed the sources of measurement instrumentation uncertainty. The analysis concludes that the actual measurement values cited in this report are accurate within the  $U_{\text{LAB}}$  intervals shown below with approximately 95% statistical confidence. Where the report shows a judgment that a test sample passes a test against a published limit based on these measured values, that judgment has a statistical confidence of 97.5% or greater. Measurement Instrumentation Uncertainty is one component of over-all measurement uncertainty, and other uncertainty components are not considered as part of this analysis.

The primary benchmark for measurement instrumentation uncertainty (MIU) in an electromagnetic compatibility (EMC) test lab is the set of  $U_{\text{CISPR}}$  values published in CISPR 16-4-2. In all cases where a  $U_{\text{CISPR}}$  value is published by CISPR, the analysis shows that  $U_{\text{LAB}}$  – this lab's estimated MIU – is better than the  $U_{\text{CISPR}}$  benchmark.

The secondary benchmark for MIU in an EMC lab performing radio transceiver tests is a set of uncertainty limit values published in various ETSI standards. In this report,  $U_{\text{ETSI}}$  is the most restrictive of the values found in the ETSI EN standards listed in section 5 of this report. The analysis principles are described in the ETSI TR documents listed there. In most cases  $U_{\text{LAB}}$  is better than the  $U_{\text{ETSI}}$  benchmark. Where  $U_{\text{LAB}}$  exceeds the  $U_{\text{ETSI}}$  benchmark cited here, that entry is preceded by an asterisk. When required by the ETSI EN standards, excess uncertainty will be added to the measurand before comparison to a limit. In an individual test report, staff may re-evaluate that excess uncertainty based on the uncertainty of the method used and the uncertainty limits of the actual ETSI EN standard being applied, and the revised uncertainty values will be shown in the test report.

Some measurement uncertainties analyzed and reported here are not addressed in CISPR 16-4-2 or the ETSI standards, as indicated by the entry 'None.'

Test Type	$U_{\text{LAB}}$	$U_{\text{CISPR}}$	$U_{\text{ETSI}}$
Conducted DC voltage	0.09% + 2 x LSDPV	None	1%
Conducted AC voltage below 500 Hz	1.0% + 3 x LSDPV	None	2%
Conducted Emissions, Mains Voltage	0.10% + 10 mV	None	None
Conducted Emissions, Mains Current	0.10% + 3 mA	None	None
Conducted Emissions, Mains Power	0.15% + 100 mW	None	None
Conducted Emissions, Power Mains, 9 kHz to 150 kHz	1.49 dB	3.8 dB	None
Conducted Emissions, Power Mains, 150 kHz to 30 MHz	1.40 dB	3.4 dB	None
Conducted Emissions, Cat 6 LCL, 150 kHz to 30 MHz	2.80 dB	5 dB	None
Conducted Emissions, Cat 5 LCL, 150 kHz to 30 MHz	3.21 dB	5 dB	None
Conducted Emissions, Cat 3 LCL, 150 kHz to 30 MHz	4.24 dB	5 dB	None
Radiated Emissions, below 30 MHz	0.88 dB	None	6 dB
Radiated Emissions, 30 MHz to 1000 MHz	2.77 dB	6.3 dB	6 dB
Radiated Emissions, 1 GHz to 18 GHz	2.60 dB	5.2 & 5.5 dB	6 dB
Radiated Emissions, 18 GHz to 26.5 GHz	2.73 dB	None	6 dB
*Radio Signal Frequency Accuracy	$1.55 \times 10^{-7}$	None	$1.0 \times 10^{-7}$
Radio Signal Occupied Bandwidth	0.95%	None	5%
Radio Power or Power Spectral Density	0.98 dB	None	1 dB
Temperature	0.38 °C	None	1 °C
Barometric Pressure	0.38 kPa	None	None
Relative Humidity	2.85% RH	None	±5% RH
Signal Timing	The greater of these three...	None	None
	0.01% of value		
	0.5 x LSDPV		

**Note:** LSDPV stands for the Least Significant Digit Place Value reported. In the value 1470 msec, the least significant digit is the 7. It has a 10 msec place value. The LSDPV is thus 10 msec and the maximum error due to roundoff would be 5 msec. If the time value were reported as 1470 msec, the underscore indicates that the 0 is a significant figure and the error due to roundoff would be 0.5 msec. All digits provided to the right of a decimal point radix are significant.

## 8. Selected Example Calculations

Certain regulators require samples of the calculations that lead from the raw measurement to the final result for AC Mains conducted and unintended radiated emissions. The assumption is that the lab performs raw measurements, then adds, subtracts, multiplies, or divides based on transducer factors, amplifier gains, and losses in the signal transmission path. In this lab, our CISPR 16 Receiver does not work that way. The calibration factors and losses and gains are provided to the receiver as detailed data files. These factors are applied in the RF measurement path prior to the detector. But as a step in the lab measurement process, staff frequently verify that these factors are applied correctly. They make a measurement with the factors applied inside the receiver, then they disable the factors and remeasure the result manually adding in the various relevant factors.

The transmission loss is measured including the combined losses and gains of preamplifiers, cables, and any band-selective filters. In many cases above 1 GHz it is a negative value, indicating that the preamplifier gain is greater than these other losses.

Here are examples of these calculations. The data in these examples was not taken as part of this project:

### 8.1 AC Mains conducted emissions at 22 MHz

(Raw measurement) + (AMN factor) + (transmission loss) = Result

$$(7.145 \text{ dB}\mu\text{V}) + (9.812 \text{ dB}) + (0.216 \text{ dB}) = 17.173 \text{ dB}\mu\text{V}$$

### 8.2 Radiated Emissions at 630 MHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

$$(2.25 \text{ dB}\mu\text{V}) + (27.80 \text{ dB/m}) + (2.89 \text{ dB}) = 32.94 \text{ dB}\mu\text{V/m}$$

### 8.3 Radiated Emissions at 2.7 GHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

$$(43.72 \text{ dB}\mu\text{V}) + (32.22 \text{ dB/m}) + (-36.09 \text{ dB}) = 39.85 \text{ dB}\mu\text{V/m}$$

## 9. Environmental Conditions During Test

Environmental conditions in the test lab were monitored during the test period. Temperature and humidity are controlled by an air handling system. As information to the reader, the conditions were observed at the values or within the ranges noted below. For any tests where environmental conditions are critical to test results and require further constraints or details, the test records in the annex may provide more specific information.

Temperature:	19.7 to 20.9 °C
Relative Humidity:	38.6% to 57.1% (non-condensing)
Barometric Pressure	96.8 to 98.7 kPa

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
Barometer	Traceable	6453	240300703	9-Apr-2024	9-Apr-2027

**Table 4: Environmental monitoring device**

## 10. Immunity Performance Criteria

If this report includes immunity tests then results have been categorized as Performance Criteria A, B, C, or D. The standards that the lab applied will define the details for A, B, and C, as well as which criterion is required for each type of test. They will also define the electrical stresses that were applied during each test. In a very general sense the observed criteria noted in this report are as follows:

Criterion A. The stress applied did not alter product operation. This criterion is generally used for ‘continuous’ stresses that can be present for a long time in the places the product will be used, or that can appear often, even though they may come and go over time.

Criterion B. The stress applied altered product operation, but the product self-recovered so that the user would not have to try to figure out how to restore it to full operation. This criterion is generally used for ‘transient’ stresses that appear briefly and occasionally, but are usually not present in the places the product will be used.

Criterion C. The stress applied altered product operation, but the user could restore it to full operation, for example by power cycling the product. This criterion is generally used for ‘transient’ stresses that appear briefly and only rarely in the places the product will be used.

Criterion D. This is not an official criterion in the standards, because it would be a failure of the requirements. This indication in a test record means the product was affected in a way that the user might not be able to correct. The effect could include some degree of hardware damage, or it could include loss of program files or data files necessary for operation.

Repeatability is an issue in all EMC immunity work. When the product operation changes unexpectedly during a test, and the change would fail the requirements of the standard, this is an anomaly. The test operator needs to determine whether the anomaly was a result of the applied electrical stress. The investigation is done by repeating the section of the test where the anomaly occurred three times. If the same or a similar anomaly occurs in any of the three repeat trials, it is confirmed as a response to the stress. If not, the anomaly is judged unreproducible and is not considered when judging the A, B, or C observed performance. Since there is usually no ability to confirm a Criterion D anomaly, these are usually treated as Criterion D upon a single occurrence.

Tests that require Criterion B performance will be judged to Pass if criteria A or B is observed. Similarly, tests that require Criterion C performance will be judged to Pass if criteria A, B, or C is observed.

11. 3m RF Chamber Block Diagrams

The 3m chamber has three basic configurations which are shown in the figures below. These figures are not to scale.

Figure 1 shows a semi anechoic setup which is typically used for frequencies below 1 GHz. In this example, the antenna is mounted on a mast capable of 1-4 m elevation changes. If a preamplifier or RF filter is used, they are located at or just below floor level. The receiver is outside the chamber, typically in an adjacent separate shielded room.

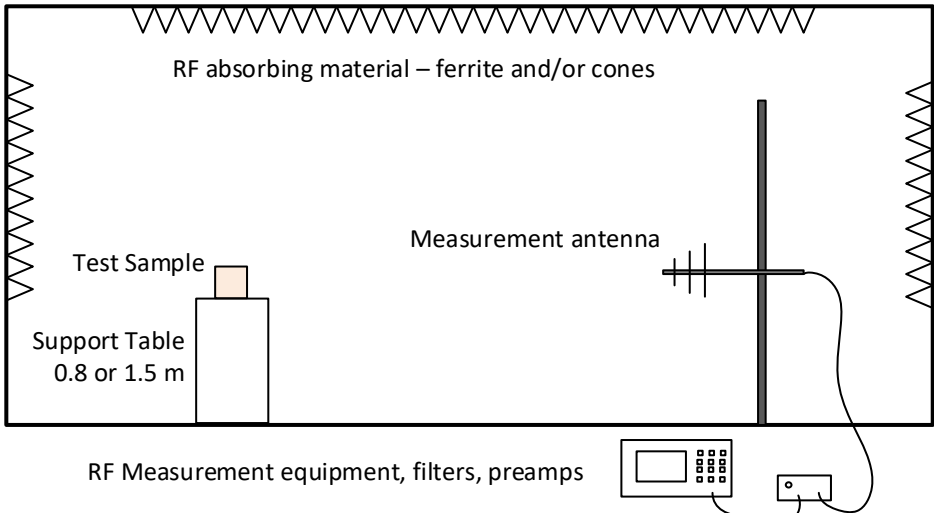


Figure 1: Typical configuration for measurements below 1 GHz

Figure 2 shows an FSOATS setup which is typically used for frequencies above 1 GHz but below an upper limit such as 14 or 18 GHz. In this example, the antenna is mounted on a mast capable of 1-4 m elevation changes and bore sighting. If a preamplifier or RF filter is used, they are located at or just below floor level. The receiver is outside the chamber, typically in an adjacent separate shielded room.

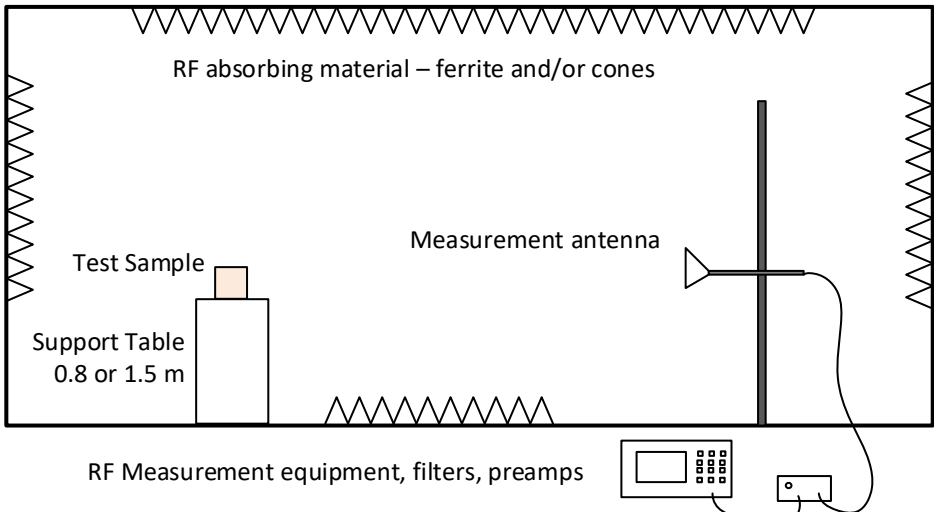


Figure 2: Typical configuration for measurements between 1 GHz and 14 GHz

Figure 3 shows an alternate FSOATS setup which is typically used for frequencies above 14 GHz. In this example, the antenna is mounted on a mast capable of 1-4 m elevation changes and bore sighting. A preamplifier is located on the mast just behind the antenna. The receiver is located in the chamber near floor level but outside the antenna beam. The receiver may be operated manually by an operator in the chamber and or remotely via an Ethernet connection.

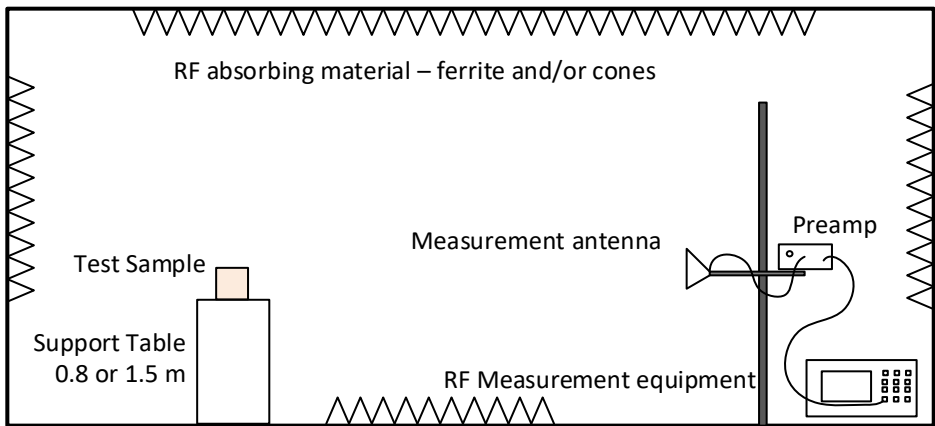


Figure 3: Typical configuration for measurements above 14 GHz

**ANNEX**

The remainder of this report is an Annex containing individual test data records. These records are the basis for the judgments summarized in section 1 of this report. The Annex ends with a set of concluding notes regarding use of the report.

**Test Record**  
**Transmitter Bandwidth Tests**  
**Test IDs TR06**  
**Project GCL-0648**

Test Date(s) 04 Sep 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183122

Operating Mode M3 (BleTx)  
Arrangement A4 (Udc)  
Input Power 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN (as noted in Section 6 of the report).

Radio Protocol Bluetooth Low Energy (BLE)  
Radio Band 2400 to 2483.5 MHz

**Pass/Fail Judgment: PASS**

**Test record created by: Jim Solum**  
**Date of this record: 05 Sep 2024**

Original record, Version A.

**Test Equipment Used**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025

**Table TR06.1: List of test equipment used**

**Test Software Used:** Keysight PXE firmware A.37.02

**Test Method**

During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified portion of the total power observed, and also identify parameters such as the edge frequencies for that bandwidth and the center frequency error. The spectrum is scanned many times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other non-WiFi radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

**Test Setup**

This block diagram shows the test equipment setup.

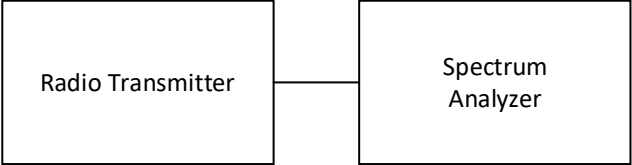


Figure TR06.1: Test setup

Test Data

The data for each test is summarized below, followed by the spectral data for each case highlighted in yellow.

The DTS Bandwidth is measured using a spectrum analyzer operating with a defined resolution bandwidth. The analysis finds the smallest continuous range of frequencies containing all emissions within 6 dB of the highest value. The requirement is that the DTS Bandwidth be greater than 500 kHz. As such the lowest measured bandwidth is worst case. All radios reported here are judged to have met this requirement.

	2402	2440	2480
BLE 1 Mbps	694.8	710.2	710.5

Table TR06.2: Summary of bandwidth data in kHz BLE modes

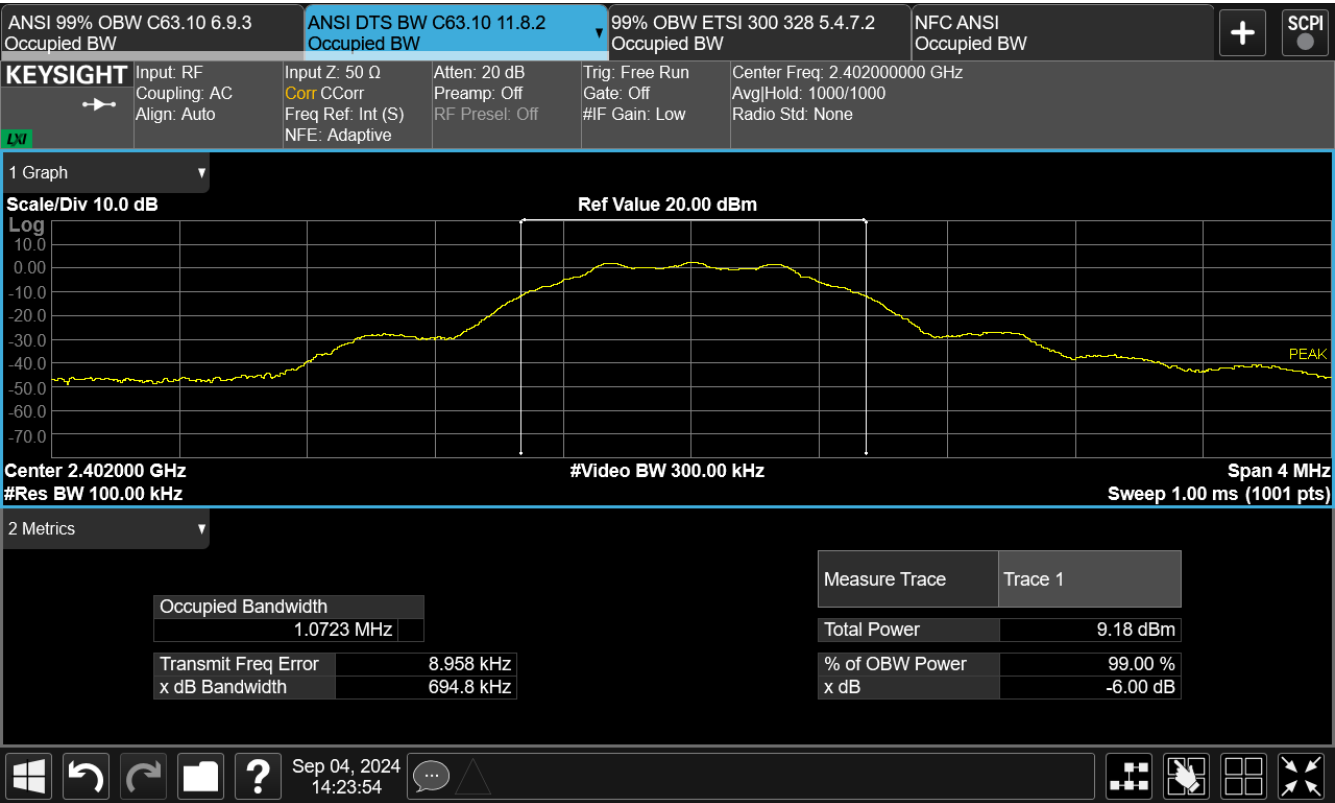


Figure TR06.2: Bandwidth data for BLE 1 Mbps at low channel (2402 MHz)

This line is the end of the test record.



**Test Record**  
**Transmitter Bandwidth Tests**  
**Test IDs TR10**  
**Project GCL0468**

Test Date(s) 04 Sep 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183122

Operating Mode M3 (BleTx)  
Arrangement A4 (Udc)  
Input Power USB 5 Vdc

Test Standards: FCC Part 2.202, ANSI C63.10, TRC-43, RSS-GEN (as noted in Section 6 of the report).

Radio Protocol Bluetooth Low Energy (BLE)  
Radio Band 2480 to 2483.5 MHz

**Pass/Fail Judgment:** **Reported**

**Test record created by:** Jim Solum  
**Date of this record:** 05 Sep 2024

Original record, Version A.

**Test Equipment Used**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025

**Table TR10.1 Equipment Used**

**Software used:** Keysight PXE software A.37.02

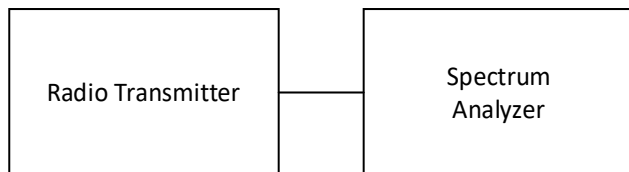
**Background**

There are regulatory requirements to present two additional types of bandwidth analyses: 99% Occupied Bandwidth and Necessary Bandwidth. There are no limits or functional requirements around these data, beyond a reporting requirement. The contents of this test record are for information, and do not affect compliance of the devices that are the subject of this report.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other Bluetooth, BLE, and ANT radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

**Test Setup**

This block diagram shows the test equipment setup.



**Figure TR10.1: Test setup**

## Occupied Bandwidth, 99% Test Method

During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified percentage of the total power observed. The spectrum is scanned hundreds of times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

## Occupied Bandwidth, 99% Test Data

The data for each type of bandwidth is summarized below, followed by the spectral data for the cases highlighted in yellow. The analysis threshold for this test was the bandwidth containing 99% of the observed power using the ANSI C63.10 method. The standards require testing a frequency near the bottom, middle, and top of the band. The measured bandwidth data are in bold font and have MHz as their units of measure.

	2402 (04)	2440	2480 (78)
BLE 1 Mbps	1.0475	1.0504	1.0496
BLE 2 Mbps	2.0417	2.0446	2.0463

Table TR10.2: Summary of 99% Occupied Bandwidth Data BLE modes



Figure TR10.2: Occupied bandwidth data for BLE 1 Mbps at mid channel (2440 MHz)

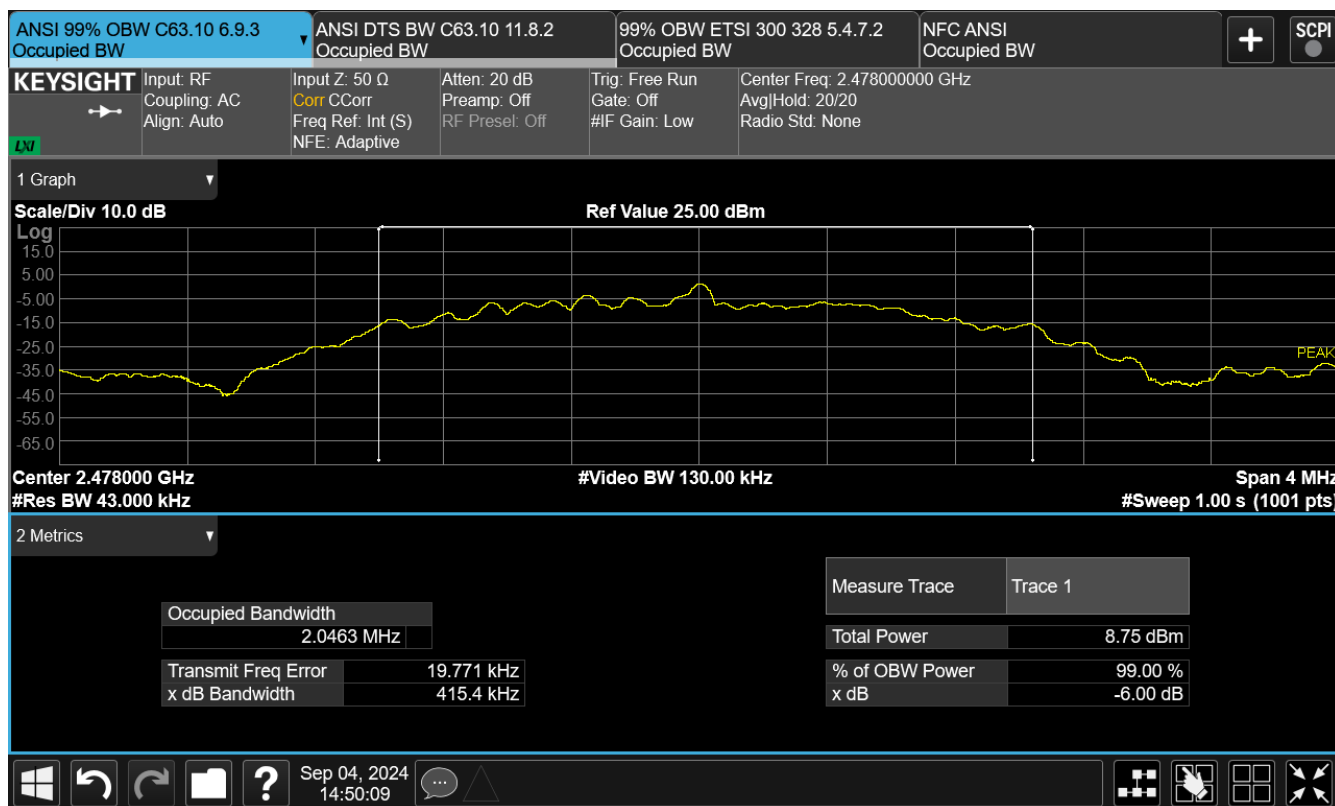


Figure TR10.3: Occupied bandwidth data for BLE 2 Mbps at high channel (2478 MHz)

### Necessary Bandwidth Calculations

The Necessary Bandwidth is a theoretical value based on the specifications for a communication protocol, rather than the hardware implementation and a subsequent lab measurement. The analysis methods in FCC Part 2.202 and TRC-43 are the same for NFC, Bluetooth, ANT, and IEEE 802.11b WiFi. However, they differ for IEEE 802.11g and 11n systems because the Canadian TRC-43 standard provides different analysis methods for Orthogonal Frequency Division Multiplexing systems (OFDM). The tables below will show the analysis for most of the radios signals as a combined approach, then separately analyze the results for IEEE 802.11g and n systems. The tables below may include radio protocols that are not part of the product being evaluated.

NFC (Near Field Communication) at 13.56 MHz uses continuous wave telegraphy without tone modulation. The bit rate 'B' in the FCC and TRC equations is split into two parts here. B is the baud rate. C is a coding factor. C=1 for Miller encoding where the transition speed is as high as the bit rate, or C=2 for Manchester encoding where the transition speed is as high as twice the bit rate). K is a factor set to 3 for non-fading circuits under the standards. The Necessary Bandwidth,  $B_N$  is then:

$$B_N = BCK$$

Radio Type	B (kbaud)	C	K	$B_N$ (kHz)
NFC A	106	1	3	318.0
NFC B	212	2	3	1272.0
NFC B	424	2	3	2544.0

Table TRxx.100: Necessary Bandwidth for NFC

The radio modulation schemes for Ant, for the various Bluetooth protocols, and for IEEE 802.11 b WiFi are a mix of Phase Shift Key (PSK) and Quadrature Amplitude Modulation (QAM) techniques. The Necessary Bandwidth calculations use the equations from 47CFR Part 2.202(g) table section 6. We have set the variable K=1, which leaves the equation for both PSK and QAM as:

$$B_N = 2R / \log_2(S)$$

where  $B_N$  is the Necessary Bandwidth, R is the bit rate, and S is the number of signaling states.

Radio Type	R Mbps	K	S	LogBase2 of (S)	$B_N$ (MHz)
ANT / ANT+	1	1	2	1	2

Table TRxx.101: Necessary Bandwidth for ANT and ANT+ Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	Method	R Mbps	K	S	LogBase2 of (S)	$B_N$ (MHz)
Bluetooth	BR	GFSK	1	1	2	1	2
	EDR2	Pi/4 DPSK	2	1	4	2	2
	EDR3	8DPSK	3	1	8	3	2
BLE	1Mbps	GFSK	1	1	2	1	2
	2Mbps	DQPSK	2	1	4	2	2

Table TRxx.102: Necessary Bandwidth for Bluetooth Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	$B_N$ (MHz)
802.11 b	1	1	1	2	1	2
	2	2	1	4	2	2
	5.5	5.5	1	4	2	5.5
	11	11	1	4	2	11

Table TRxx.103: Necessary Bandwidth for IEEE 802.11 b Radio Protocol (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	$B_N$ (MHz)
802.11 a/g	6	6	1	2	1	12
	9	9	1	2	1	18
	12	12	1	4	2	12
	18	18	1	4	2	18
	24	24	1	16	4	12
	36	36	1	16	4	18
	48	48	1	64	6	16
	54	54	1	64	6	18
802.11 n/ac	MCS0	7.2	1	2	1	14.4
	MCS1	14.4	1	4	2	14.4
	MCS2	21.7	1	4	2	21.7
	MCS3	28.9	1	16	4	14.5
	MCS4	43.3	1	16	4	21.7
	MCS5	57.8	1	64	6	19.3
	MCS6	65	1	64	6	21.7
	MCS7	72.2	1	64	6	24.1
	MCS8	86.7	1	256	8	21.7

Table TRxx.104: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac 20 MHz Radio Protocols (FCC)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B <sub>N</sub> (MHz)
802.11 n/ac	MCS0	15	1	2	1	30.0
	MCS1	30	1	4	2	30.0
	MCS2	45	1	4	2	45.0
	MCS3	60	1	16	4	30.0
	MCS4	90	1	16	4	45.0
	MCS5	120	1	64	6	40.0
	MCS6	135	1	64	6	45.0
	MCS7	150	1	64	6	50.0
	MCS8	180	1	256	8	45.0
	MCS9	200	1	256	8	50.0

Table TRxx.105: Necessary Bandwidth for IEEE 802.11 n and ac 40 MHz Radio Protocols (FCC)

As a note, the bit rate for IEEE 802.11 n or ac WiFi is calculated based on the IEEE standard's short guard interval of 400 nsec. If only the long guard interval of 800 nsec were implemented, the bit rates would decrease by a small amount.

The TRC-43 method for OFDM signals simply multiplies the number of subcarriers, K, and the subcarrier spacing, N<sub>s</sub>. In both cases, N<sub>s</sub> is 312.5 kHz. The count of subcarriers includes nulls. So for example, 802.11 n uses 4 pilot subcarriers, 52 data subcarriers, and one null suppressed subcarrier in the middle for 57 total subcarrier channels.

$$B_N = N_s * K$$

Radio Type	Mode	N <sub>s</sub> (MHz)	K	B <sub>N</sub> (MHz)
802.11a/g	20 MHz	0.3125	53	16.6
802.11n/ac	20 MHz	0.3125	57	17.8
802.11n/ac	40 MHz	0.3125	117	36.6

Table TRxx.106: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac Radio Protocols (TRC-43)

**This line is the end of the test record.**

**Test Record**  
**Transmitter Power, Duty Cycle**  
**Test IDs TR02**  
**Project GCL0648**

Test Date(s) 29 Aug and 19, 20 Sep 2024, 11 Nov 2024  
Test Personnel Vladimir Tolstik supervised by Jim Solum and Majid Farah

Product Model AA4999  
Serial Number 483183122

Operating Mode M3 (BleTx)  
Arrangement A4 (Udc)  
Input Power 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, ETSI EN 300 328, RSS-GEN, RSS-247, (as noted in Section 6 of the report).

Antenna Gain -0.35 dBi, as reported by the client  
Radio Protocol Bluetooth Low Energy  
Hopping Frequencies 40 for BT-LE

**Pass/Fail Judgment: PASS**

**Test record created by:** Jim Solum, Vladimir Tolstik, Majid Farah  
**Date of this record:** 12 Nov 2024

Version C has an update of table TR02.4.  
Version B was an updated test record with power data using gated average power with broadband power meter on 31 Oct 2024. Original record, Version A dated 30 Sep 2024.

**Test Equipment Used**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
RF Power Sensor	Rohde&Schwarz	NRP8S	109927	18-Jul-2024	18-Jul-2026
RF Power Sensor	Rohde&Schwarz	NRP8S	109124	18-Jul-2023	15-Jul-2025
Thermometer	Thermco	ACCD370P	210607316	21-Sep-2023	15-Sep-2025
Thermal Chamber	Tenney	T2RC	32774-02	Calibration	Not Required

Table TR02.1: List of test equipment used

Software used: Rohde & Schwarz Power Viewer V11.3; TimePowerAnalysisSpreadsheetV12a.xls

**Test Method**

The basic test standards provide options for the time evaluation test method. The following test methods were applied.

ETSI EN 300 328: 5.4.2.2.1.3  
ANSI C63.10: 11.9.2.3.2 (Gated average power with broadband power meter)

Under the ETSI standard, the parameters of duty cycle, transmitter timing, or medium utilization are typically not required for adaptive transceivers or transceivers emitting at 10 dBm EIRP or less, so those results will typically be omitted from the data set. Duty Cycle data will be included if it is relevant to test methods used for other standards such as Average Detector methods in the ANSI standards that apply duty cycle correction or certain kinds of analysis under the RF exposure standards.

## Transmit Power and Timing Data

Each measurement is made conducted from the antenna port with the transmitter on a specified channel and in a selected transmission protocol. Where standards cited here apply harmonized test methods and different limits, the more strict limit has applied.

This test record will show results based on one or more of the following methods of analyzing the same set of raw power data vs. time. The ANSI peak power method looks for the highest power in the data record, with results in dBm units. The ANSI gated average power method determines the average power in the data record but only during times when the transmitter is keyed on, with results in dBm units. Under the US and Canadian rules a limit of 30 dBm is applied independent of which ANSI method is used. The ETSI 300 328 method looks at the individual transmission bursts within the data record and reports the power level from the burst with the for the highest average power. The ETSI result is presented in dBm EIRP units, and a 20 dBm EIRP limit is applied. The RF exposure analysis asks for the average power observed over the entire data record time, with results in linear power units such as milliwatts. RF exposure limits are not addressed in this test record. Many of these standards also care about duty cycle, the portion of the time when the transmitter was actually transmitting. That is presented as a percentage, and no limit applies. All of these results are drawn from the same trace of Tx power data. The results are shown below.

### ANSI Power

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	2.00	NT	1.92	NT	1.81
BT Low Energy	2 Mbps	NT	1.53	1.45	1.35	NT

Table TR02.2: Transmit Power, ANSI method, in dBm

The following figures show the gate settings used for the test cases highlighted in yellow in Table TR02.2. Gate setting diagrams may not be included for radio modes where the duty cycle reported in Table TR02.6 below is greater than 98%, since ANSI C63.10 treats these as continuous transmissions.

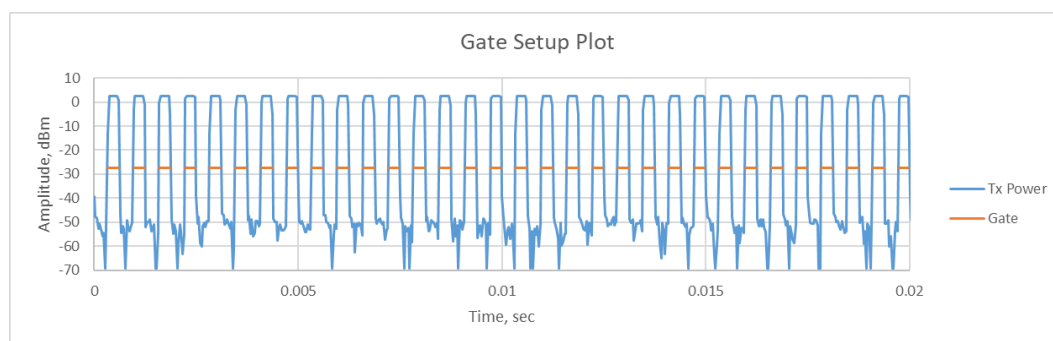


Figure TR02.1: Gate setting diagram for BLE Radio, 1 Mbps modulation, 2402 MHz

### ETSI Power

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	2.06	NT	1.97	NT	1.86
BT Low Energy	2 Mbps	NT	1.41	1.33	1.23	NT

Table TR02.3: Transmit Power, ETSI method, in dBm EIRP

The ETSI method also requires that transmit power be verified for stability at the extremes of operating temperature. The BLE1 transmitter was verified for power stability vs temperature on 2402 MHz.

Tx Mode	Temp	Power	Limit	Result
Bluetooth	°C	dBm EIRP	dBm EIRP	
BLE 1 Mbps	60	0.99	20	Pass
BLE 1 Mbps	20	1.45	20	Pass
BLE 1 Mbps	-20	2.51	20	Pass

Table TR02.4: Transmit Power over temperature, ETSI method, in dBm EIRP

Other Power Analyses

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	0.74	NT	0.73	NT	0.71
BT Low Energy	2 Mbps	NT	0.40	0.39	0.38	NT

Table TR02.5: Transmit Power, RF exposure method, in mW

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	46.7%	NT	46.7%	NT	46.7%
BT Low Energy	2 Mbps	NT	28.0%	28.0%	28.0%	NT

Table TR02.6: Duty cycle for each radio mode

**Setup Diagram**

The following block diagrams show how the EUT and test equipment is arranged for test.

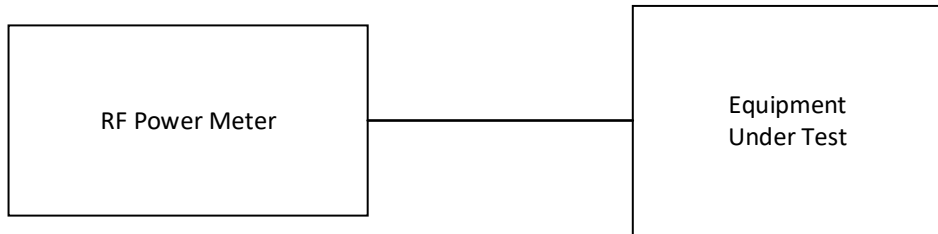


Figure TR02.2: Test equipment setup

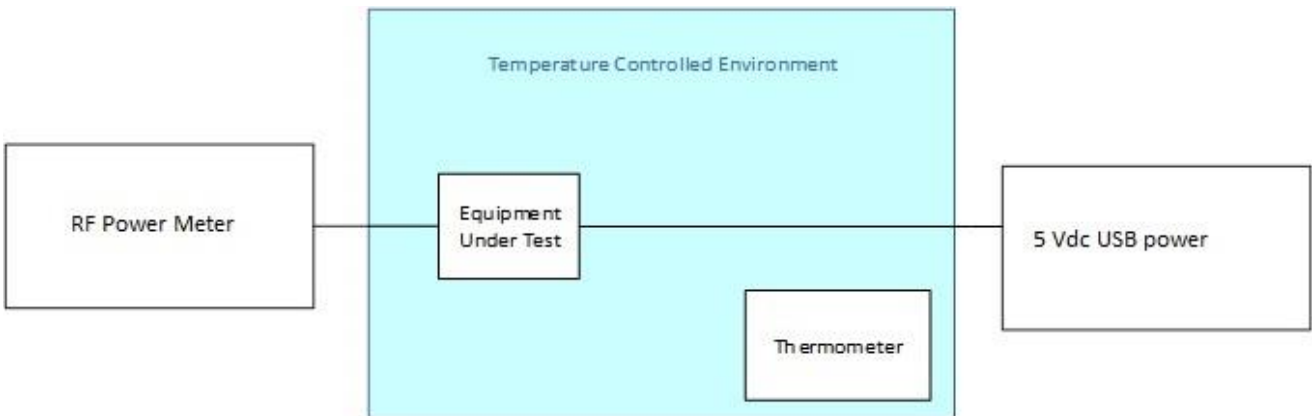


Figure TR02.3: Test equipment setup during power measurement in extreme conditions

This line is the end of the test record.



## Test Record

### Conducted Spurious Emissions Test TR27

### Project GCL0648

Test Date(s) 10 Sep 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183122

Operating Mode M3 (BleTx)  
Arrangement A4 (Udc)  
Input Power USB 5V dc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, RSS-247 (as noted in Section 6 of the report).

**Pass/Fail Judgment: PASS**

**Test record created by: Jim Solum**  
**Date of this test record: 10 Sep 2024**

Original record, Version A.

### Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025

**Table TR27.1: Test equipment used**

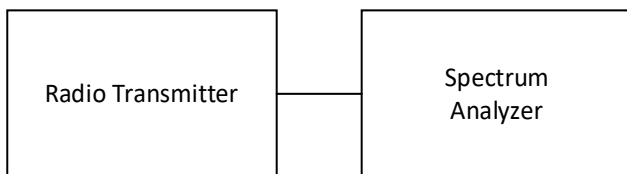
**Test software used:** Keysight PXE software A.33.03.

### Test Method

The basic test standards provide options for the test method. The following test methods were applied.  
ANSI C63.10: 11.11.2 and 11.11.3

### Test Setup

This block diagram shows the test equipment setup.



**Figure TR27.1: Test setup**

### Test Data

The conducted spurious emission test measures the strength of intentional and unintentional radio signals conducted from the transmitter to the antenna across a wide range of frequencies. It does not evaluate whether intentional signals meet specific limits. Rather, it ensures that magnitudes unintentional signals are sufficiently reduced relative to the intentional signal to satisfy the requirements of the relevant standards.

This measurement requires that a coaxial feed line from the transmitter is available as a connector exterior to the test sample. This feed line and connector may be a part of the shipping product, or it may be a special modification

to the product for testing purposes. The connector is attached via laboratory cables to the measurement instrument. The results have been adjusted to account for the losses in the laboratory cables. Where feasible, the losses of any added feed lines are also included in that adjustment.

Data is collected using the required detector function(s) across the frequency range. The instrument uses a 100 kHz bandwidth detector at half-bandwidth intervals to ensure overlapping measurements. For very wide spectra, this may be done by subranges. The data sets are saved for later analysis.

The data table below shows the final measurement data which may be at harmonics of the carrier, or at frequencies that represent one of the highest data points measured.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For BLE, operating at 1 Mbps, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

The peak level of the fundamental is also identified. The harmonics or spurious emissions must be reduced from this fundamental level by 30 dBc. This harmonic limit is calculated and used to determine compliance. A reduction from the carrier that is greater than 30 is a passing result. The minimum margin from the peak level for each mode are highlighted in yellow.

Data plots are provided for the worst-case data sets. One plot shows the spectrum at the carrier, and another shows the spectrum across the band. On this second plot, a green reference line is at approximately the 20 dBc spurious emission level.

		2402 (04)	2440	2480 (78)
BLE	1 Mb	55.97	60.70	60.54
	2 Mb	59.06	61.21	58.59

Table TR27.2: Results Summary in dBc

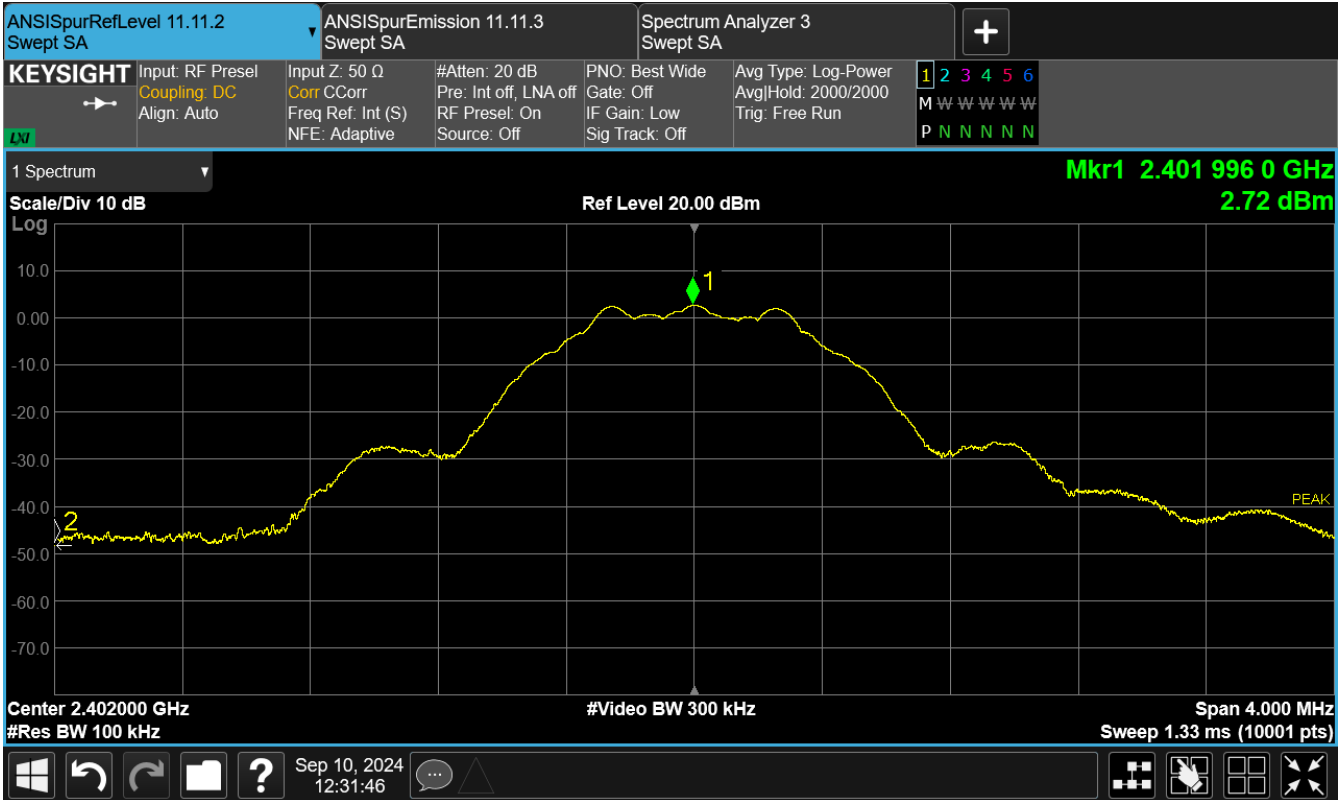


Figure TR27.2: Reference level measurement for BLE 1 at 2402 MHz

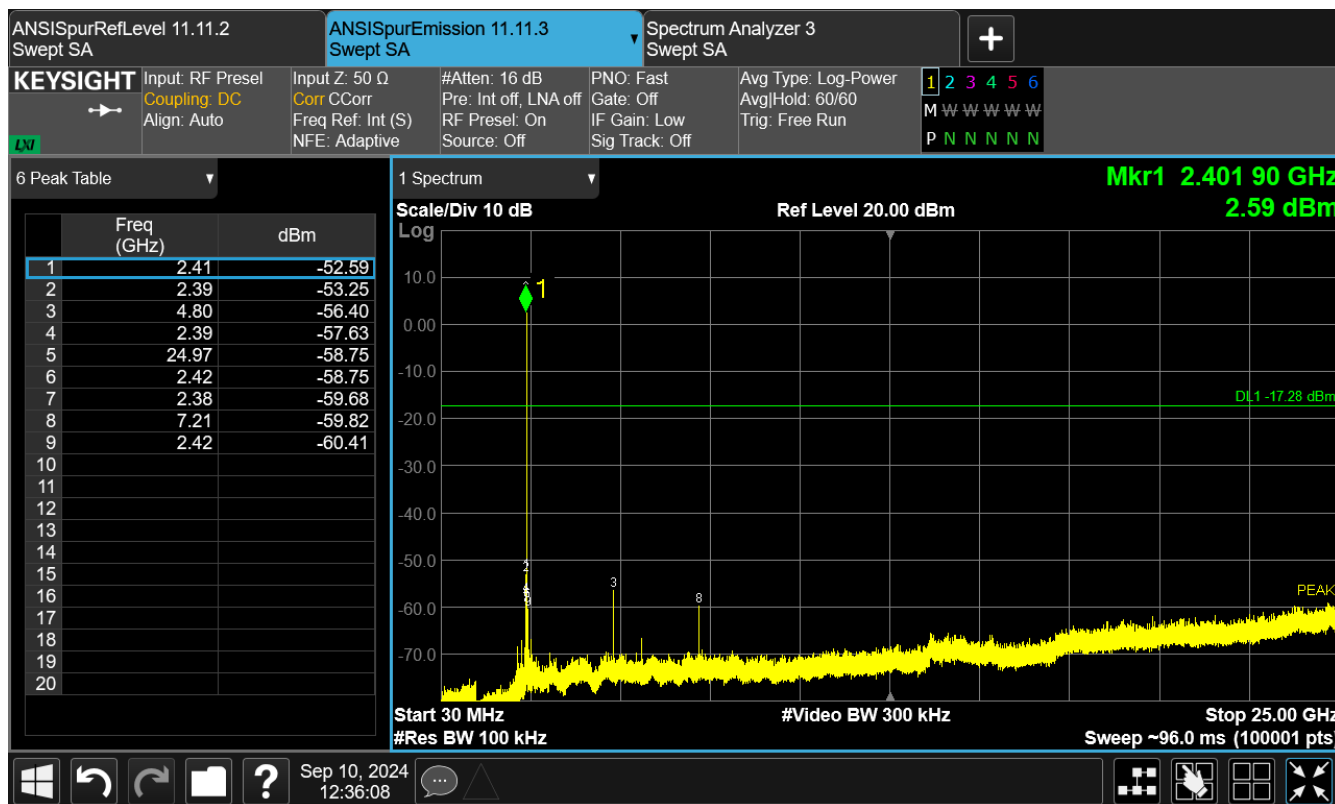


Figure TR27.3: Spectral data for BLE 1 at 2402 MHz

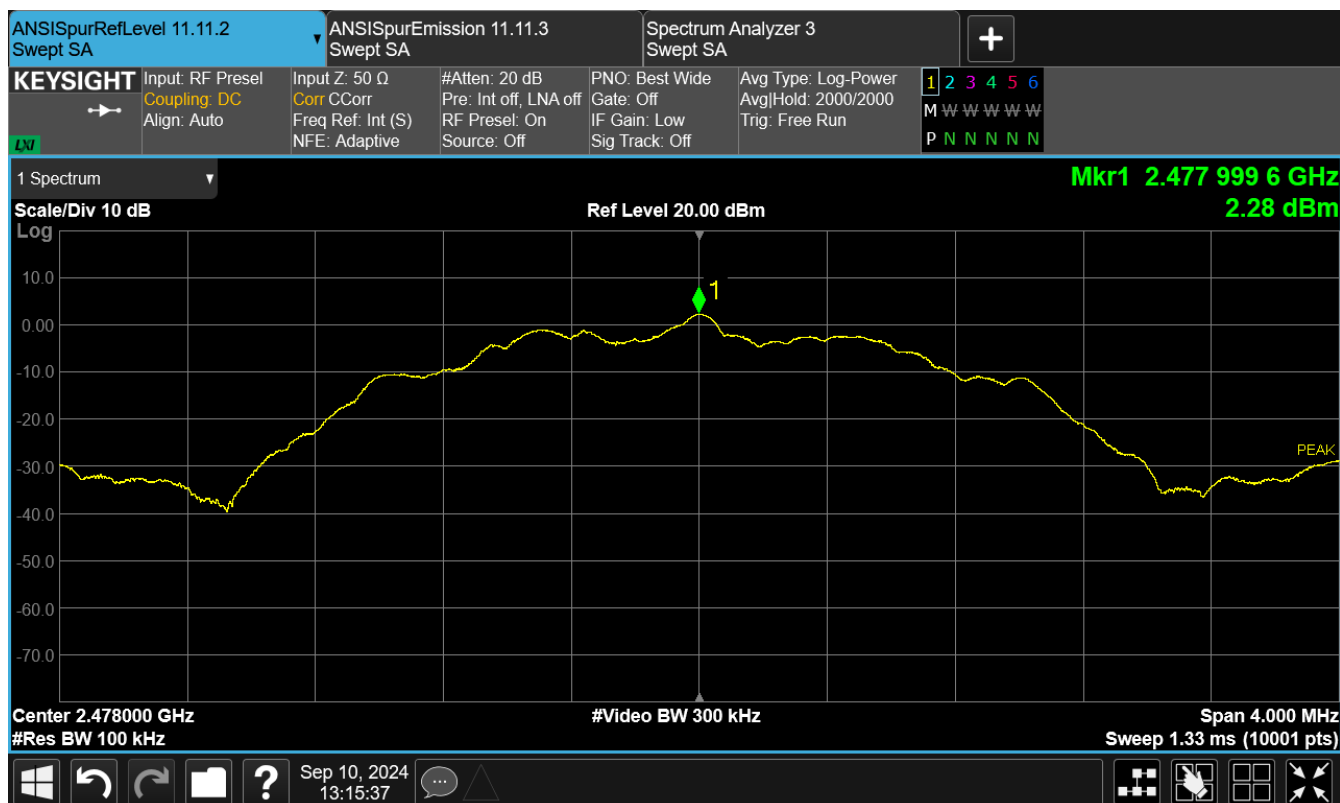


Figure TR27.4: Reference level measurement for BLE 2 Mbps at 2478 MHz

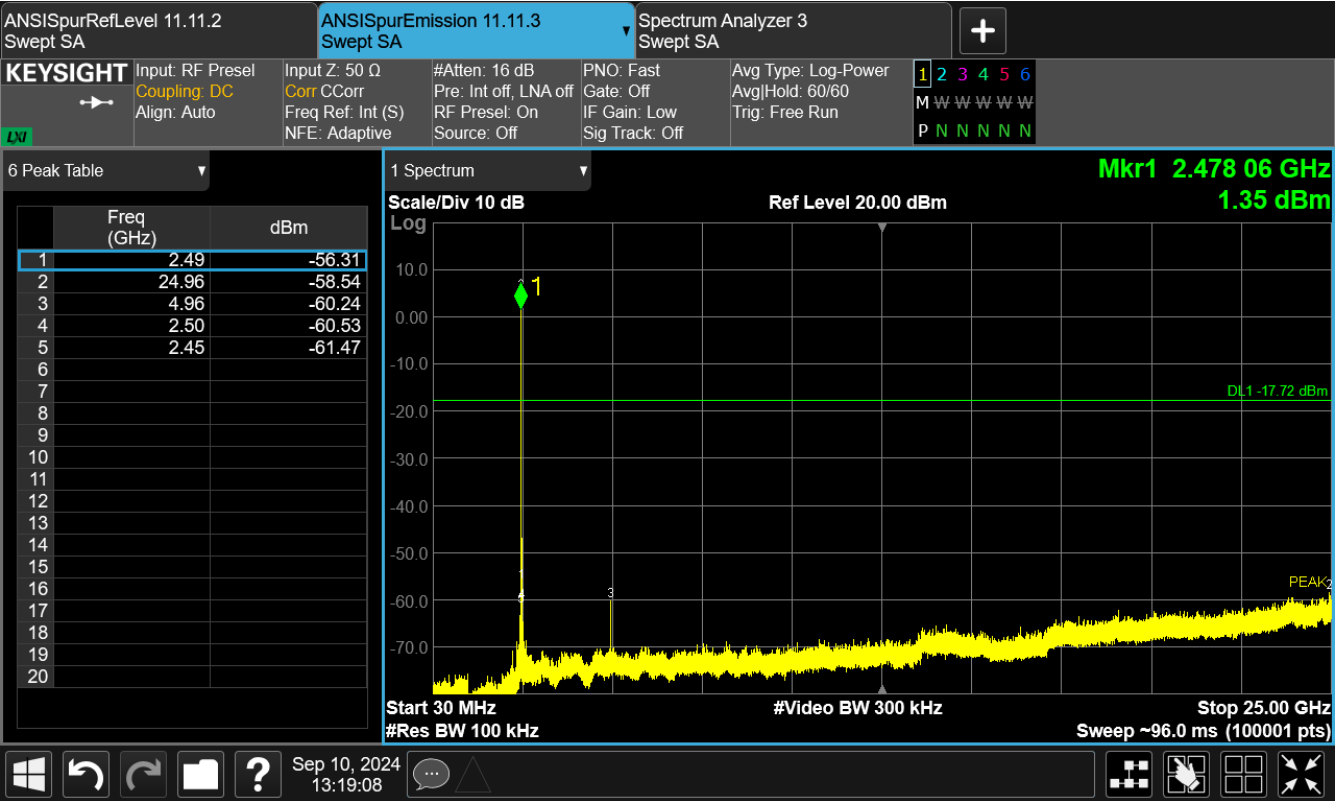


Figure TR27.5 Spectral data for BLE 2 Mbps at 2478 MHz

This line is the end of the test record.

**Test Record**  
**Radiated Emission Test RE03**  
**Project GCL0648**

Test Date(s) 11 Sep 2024  
Test Personnel Vladimir Tolstik supervised by Jim Solum

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx)  
Arrangement A2 (Upwr)  
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, RSS-210 (as noted in Section 6 of the report)

Frequency Range: Restricted Bands (2200-2300 MHz, 2310-2390 MHz, 2483.5-2500 MHz)

**Pass/Fail Judgment: PASS**

**Test record created by:** Jim Solum  
**Date of this record:** 12 Sep 2024

Original record, Version A.

**Test Equipment**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	00259208	30-May-2024	30-May-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-01		Calibration	Not Required
Shockforce G1 Tape Measure	Crecent Lufkin	L1135CME-02	GMN0013784	26-Jun-2024	26-Jun-2027

**Table RE03.1: Test Equipment Used**

**Software Used**

Keysight PXE receiver software A.32.06, RE Signal Maximization Tool v2024Jul31.xlsx

**Test Data**

The radiated emission test began with a preliminary scan in each restricted band at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Final field strength measurements were taken in that set of positions.

Restricted band measurements in the lower band were made while the transmitter was tuned to its lowest frequency of 2402 MHz for the 1 Mbps data rate, and 2404 MHz for the 2 Mbps data rate. Measurements in the upper band were made while the transmitter was tuned to its highest frequency of 2480 MHz for the 1 Mbps data rate, and 2478 MHz for the 2 Mbps data rate.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The tables show the selected final measurement data between the FCC restricted bands. It includes a the strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC restricted band Class B Limit at 3m.

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dB)	(dB)	(degree)	(mm)	---
2389.8	54	74	31.91	54.42	22.10	19.58	146	1863	HORZ
2390	54	74	31.94	54.77	22.06	19.24	146	1863	HORZ

**Table RE03.2: FCC restricted bands from 2200 to 2390 MHz, BLE 1 Mbps**

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dB)	(dB)	(degree)	(mm)	---
2390	54	74	31.95	53.80	22.05	20.20	146	1863	HORZ
2390	54	74	31.96	54.30	22.04	19.70	146	1863	HORZ

**Table RE03.3: FCC restricted bands from 2200 to 2390 MHz, BLE 2 Mbps**

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dB)	(dB)	(degree)	(mm)	---
2483.5	54	74	33.24	61.71	20.76	12.29	167	3720	VERT
2483.5	54	74	33.24	61.66	20.76	12.34	167	3720	VERT

**Table RE03.4: FCC restricted band from 2483.5 to 2500 MHz, BLE 1 Mbps**

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dBµV/m)	(dB)	(dB)	(degree)	(mm)	---
2483.5	54	74	32.93	59.04	21.07	14.959	167	3720	VERT
2483.5	54	74	32.92	58.94	21.08	15.059	167	3720	VERT

**Table RE03.5: FCC restricted band from 2483.5 to 2500 MHz, BLE 2 Mbps**

The graphs below show the background spectrum observed during pre-scan, as well as the final data points from the table above.

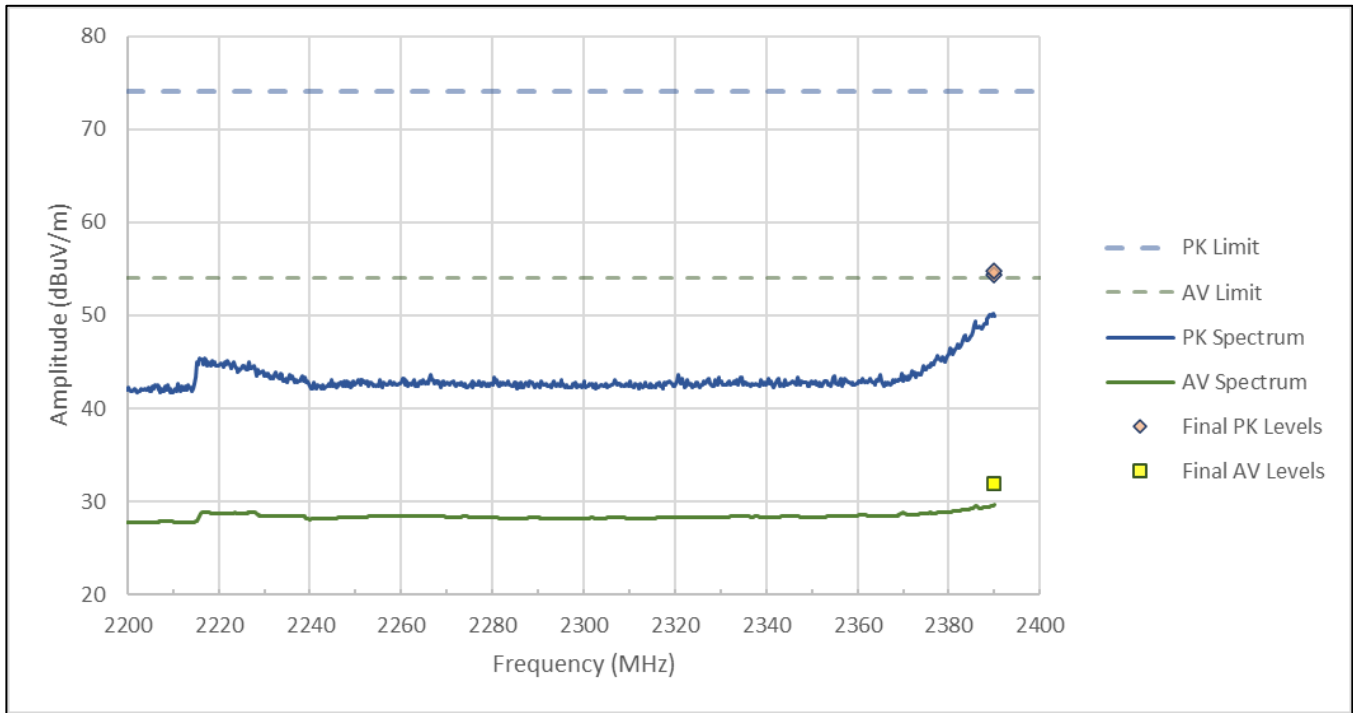


Figure RE03.1: FCC restricted band spectral data from 2200 to 2390 MHz, BLE 1 Mbps

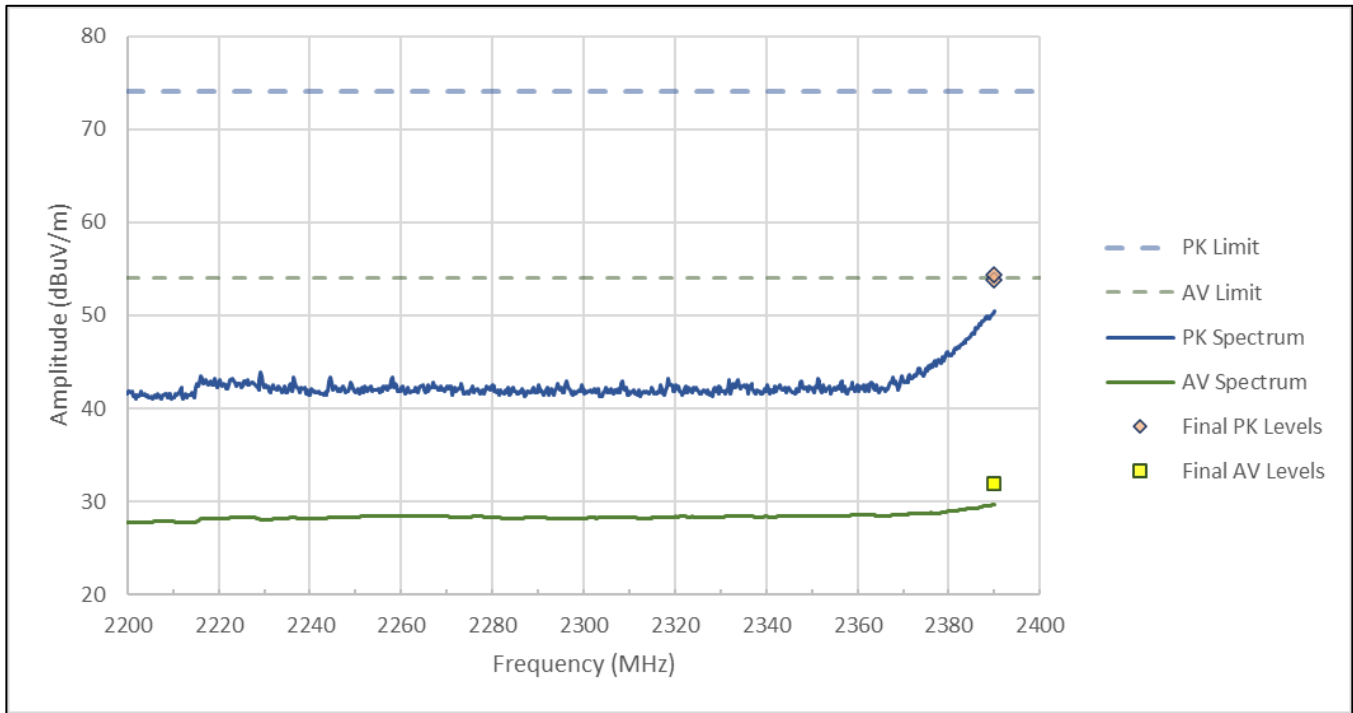


Figure RE03.2: FCC restricted band spectral data from 2200 to 2390 MHz, BLE 2 Mbps

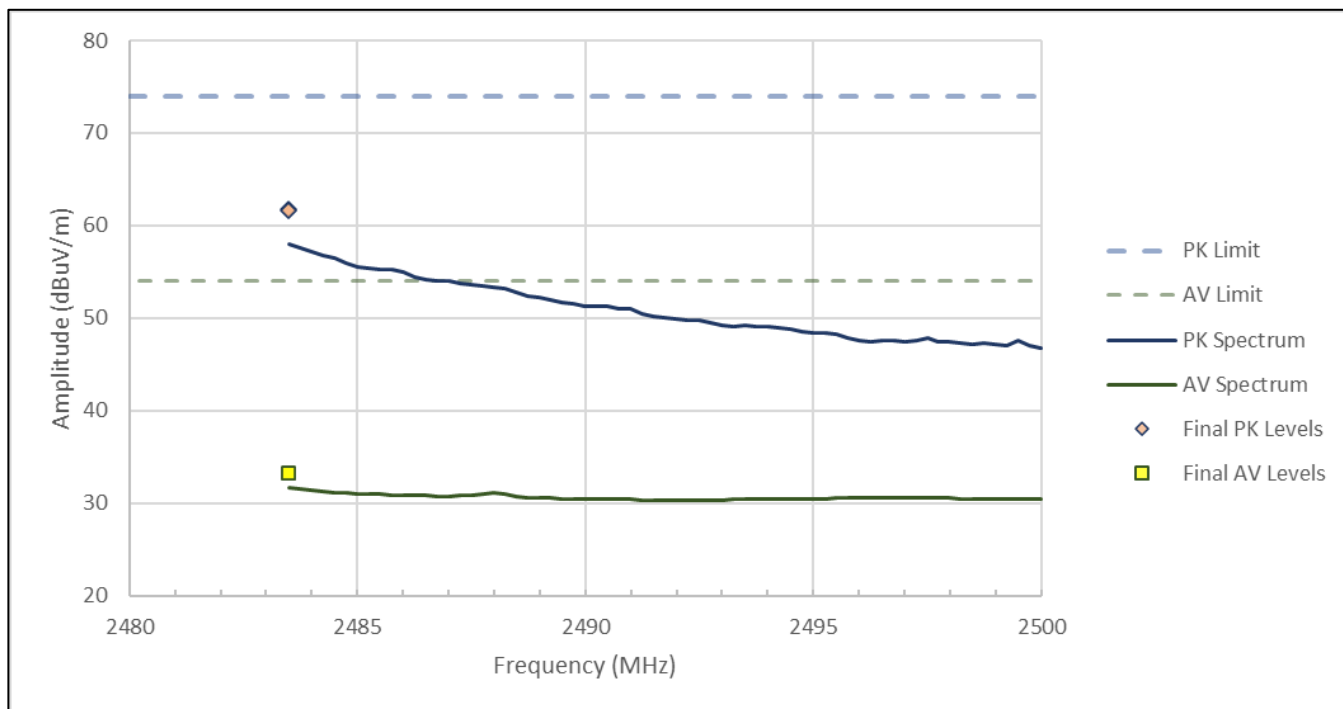


Figure RE03.3: FCC restricted band spectral data from 2483.5 to 2500 MHz, BLE 1 Mbps

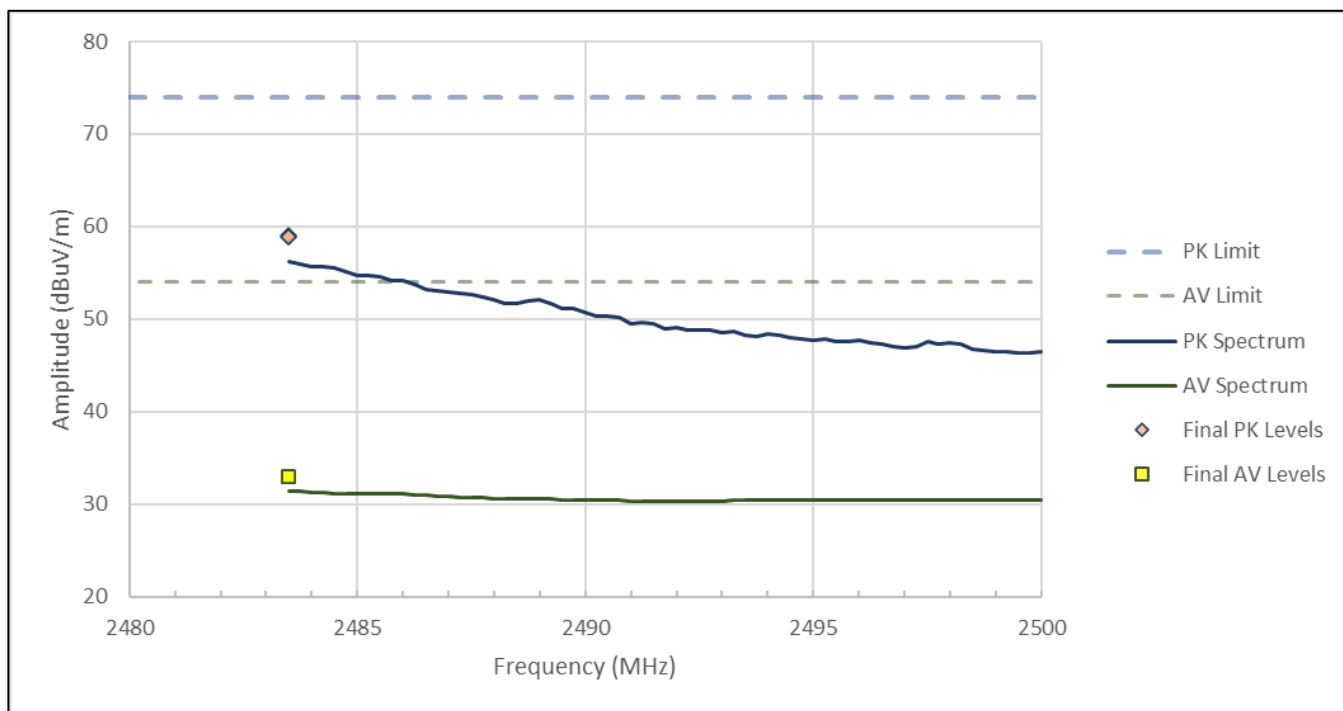


Figure RE03.4: FCC restricted band spectral data from 2483.5 to 2500 MHz, BLE 2 Mbps



Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE03.5: EUT test setup, primary view

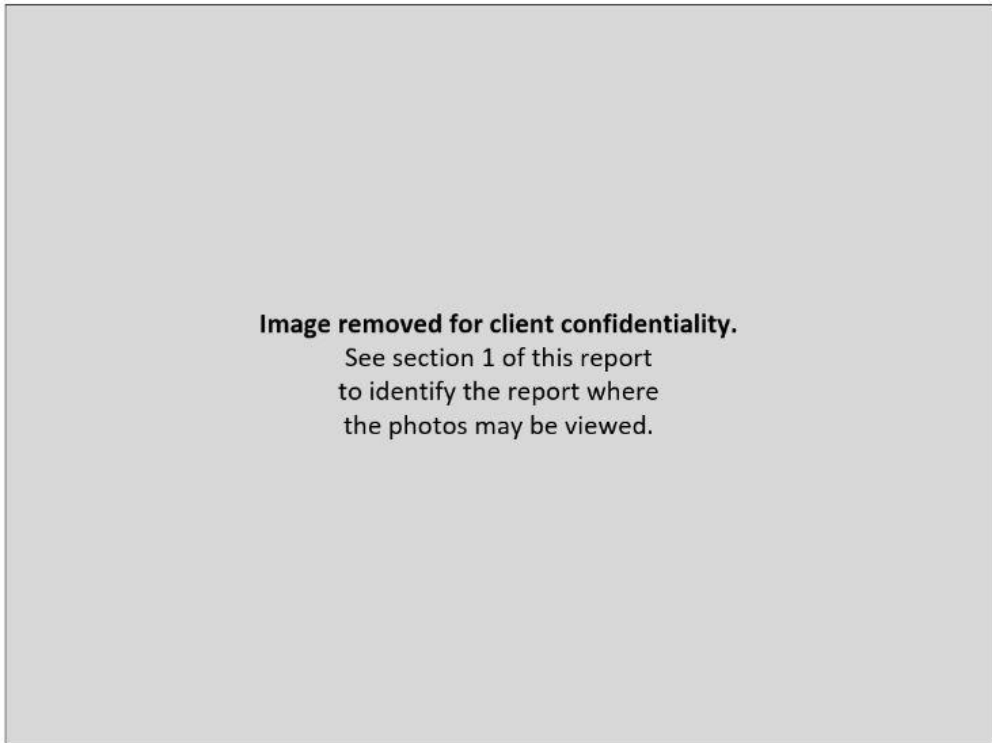


Figure RE03.6: EUT test setup, reverse view

This line is the end of the test record.

Test Record

Page 33 of 55	GCL Test Report 2024-168	Version A
This report may be reproduced in whole. Reproduction of parts or excerpts requires lab management approval.		
Garmin		

## Transmitter Power Spectral Density

### Test IDs TR19

### Project GCL-0648

Test Date(s) 09 Sep 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183122

Operating Mode M3 (BleTx)  
Arrangement A1 (Solo)  
Input Power Battery

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, RSS-210 (as noted in Section 6 of the report).

Antenna Gain -0.35 dBi, as reported by the client  
Radio Protocol Bluetooth Low Energy (BLE)

**Pass/Fail Judgment: PASS**

Test record created by: Jim Solum  
Date of this record: 10 Sep 2024

Original record, Version A.

### Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025

**Table TR19.1: Test equipment used**

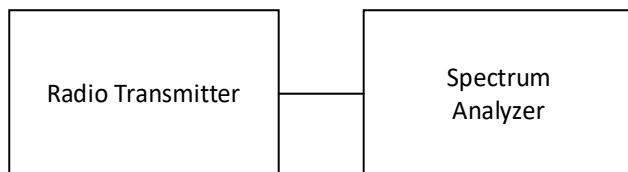
**Software Used:** Keysight PXE software A.37.02

### Test Method

The basic test standards provide options for the test method. The following test methods were applied.  
ANSI C63.10: PKPSD (11.10.2)

### Test Setup

This block diagram shows the test equipment setup.



**Figure TR19.1: Test setup**

### Test Data

Each measurement is made conducted from the antenna port with the transmitter on a specified channel and in a selected transmission protocol. The results include the effects of any measurement cable losses. Results reported are in units of dBm/Bandwidth and do not include the effect of antenna gain. The standard limit is 8 dBm / 3 kHz, and meeting the limit with a wider resolution bandwidths is permitted. All data met the limit using a 3 kHz resolution bandwidth.

For BLE operating at 1 Mbps, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

The highest PSD levels for each mode are highlighted in yellow, and graphical results are provided for those cases.

	2402	2440	2480
BLE 1 Mbps	-13.80	-13.87	-13.75

Table TR19.2: Summary of results

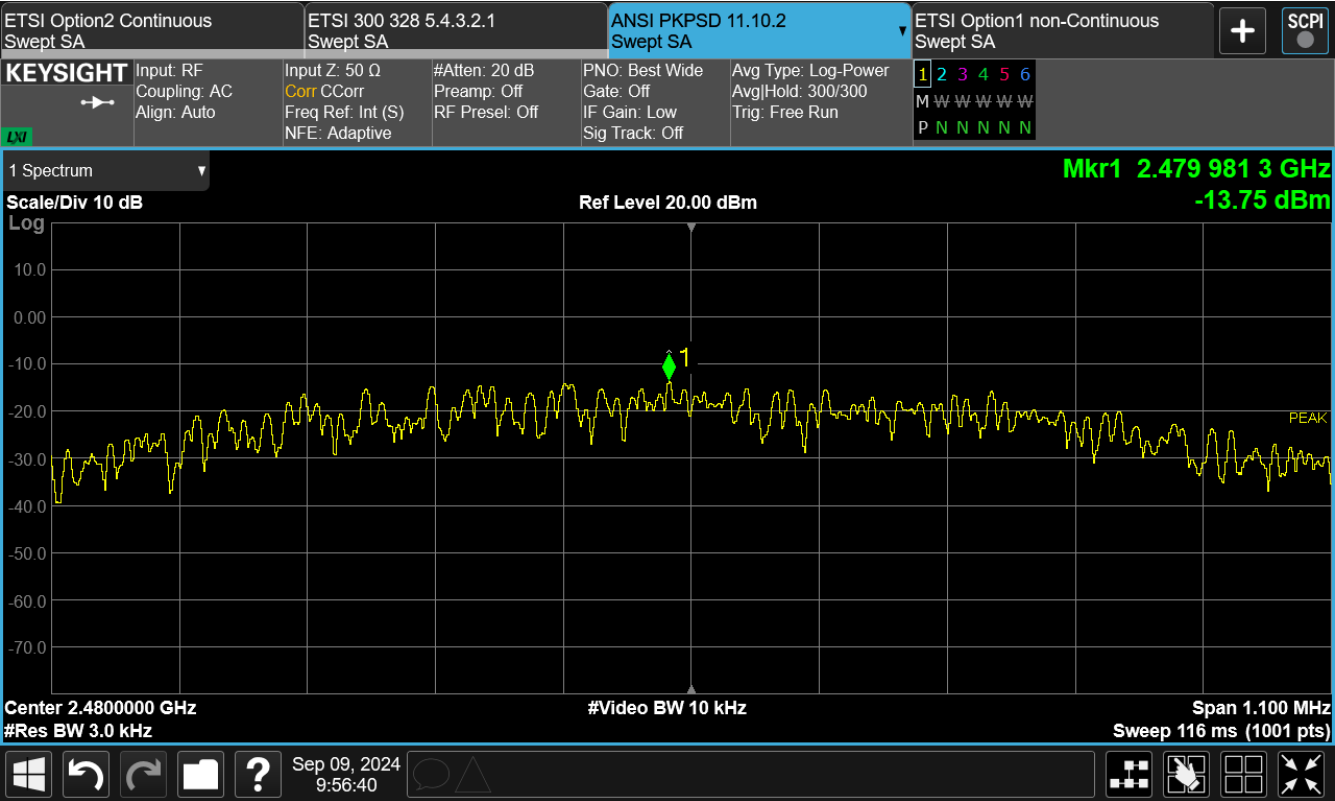


Figure TR19.2: Test data for BLE 1 Mbps 2480 MHz

This line is the end of the test record.

**Test Record**  
**Radiated Emission Test RE37**  
**Project GCL0468**

Test Date(s) 09 Oct 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx)  
Arrangement A2 (Upwr)  
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247, RSS-GEN (as noted in Section 6 of the report).

Frequency Range: 9 kHz to 30 MHz  
**Pass/Fail Judgment: PASS**

**Test record created by:** Jim Solum  
**Date of this record:** 14 Oct 2024

Original record, Version A.

**Test Equipment**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	2-Nov-2024
Loop antenna, amplified	Schwarzbeck	FMZB 1519B	00174	18-Jul-2024	18-Jul-2026
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	7-Nov-2022	7-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026

**Table RE37.1: Test Equipment Used**

**Software Used:** Keysight PXE software A.32.06, RE 150k to 30M Signal Maximization Tool V1 2021Mar17.xlsx, RE 9k to 30M XYZ\_orientations\_TemplateV7.xlsm, RE Loop 9k30mAnalysisV1.xlsx

**Test Data**

For test standards that require reorienting the test sample, preliminary scans were taken in those alternate orientations to find the orientation that produced that largest field at the receive antenna. With intentional radiators, that highest field is usually found at the carrier frequency. The alternate orientations are typically described as X, Y, and Z and explained with a photograph. Subsequent testing was done using on the orientation identified in this way.

The radiated emission test process continued with a preliminary scan at multiple turntable angles, and in the three loop antenna polarizations. The loop antenna was positioned at a 1.5 m height. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the loop was set to the worst case orientation for that frequency and the turntable angle was explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 9 kHz and 30 MHz. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

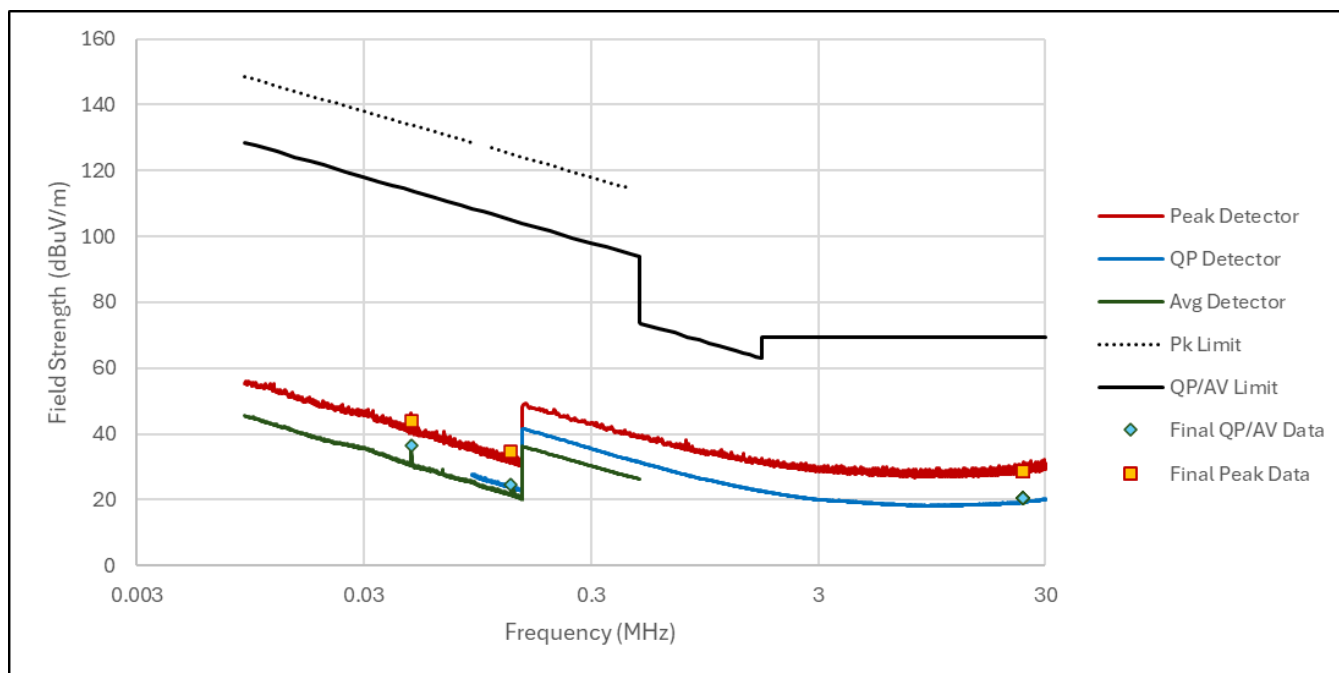
Test limits for electric fields above 30 MHz that are stated for a distance other than 3 m are adjusted to 3 m with a factor of 20 dB [per decade of distance. Test limits for electric or magnetic fields below 30 MHz that are stated for a distance other than 3 m are adjusted to 3 m by one of two methods. For ETSI testing, the extrapolation uses the curve of ETSI EN 300 330 Annex H figure H.2. For FCC and ISSED testing, the conservative method of ANSI C63.10 clause 6.4.4.1 is applied: 40 dB per decade for distances within ( $\text{wavelength} / 2 \pi$ )

In this test, fewer than six emissions were observed within 20 dB of the limit. The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

Freq.	Level	Detector	Limit	Margin	Peak Level	Pk Limit	Pk Margin	Antenna	Table
MHz	dBuV/m	Type	dBuV/m	dB	dBuV/m	dBuV/m	dB	Orientation	Azimuth, deg
0.04855	36.31	Avg	113.88	77.57	43.83	133.88	90.05	X	152
0.13335	24.59	Avg	105.10	80.51	34.56	125.10	90.55	Y	-111
24	20.63	QP	69.54	48.92	28.57	None	None	Z	-70

**Table RE37.2: Emission summary**

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.



**Figure RE37.1: Spectral data**

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE37.2: EUT test setup, first view (Antenna X POL)



Figure RE37.3: EUT test setup, second view (Antenna X POL)

**Image removed for client confidentiality.**

See section 1 of this report  
to identify the report where  
the photos may be viewed.

**Figure RE37.4: EUT test setup, first view (Antenna Y POL)**

**Image removed for client confidentiality.**

See section 1 of this report  
to identify the report where  
the photos may be viewed.

**Figure RE37.5: EUT test setup, second view (Antenna Y POL)**

**Image removed for client confidentiality.**

See section 1 of this report  
to identify the report where  
the photos may be viewed.

**Figure RE37.6: EUT test setup, first view (Antenna Z POL)**

**Image removed for client confidentiality.**

See section 1 of this report  
to identify the report where  
the photos may be viewed.

**Figure RE37.7: EUT test setup, second view (Antenna Z POL)**

This line is the end of the test record.



**Test Record**  
**Radiated Emission Test RE38**  
**Project GCL0648**

Test Date(s) 07 Oct 2024  
Test Personnel Jim Solum

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx)  
Arrangement A2 (Upwr)  
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247, RSS-GEN (as noted in Section 6 of the report).

Frequency Range: 30 MHz to 1000 MHz  
**Pass/Fail Judgment: PASS**

**Test record created by:** Jim Solum  
**Date of this record:** 08 Oct 2024

Original record, Version A.

**Test Equipment**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	2-Nov-2024
Antenna, Biconilog, 30M-6 GHz	ETS Lindgren	3142E	00233201	18-Jul-2024	18-Jul-2026
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	7-Nov-2022	7-Nov-2025
Shockforce G1 Tape Measure	Crecent Lufkin	L1135CME-02	GMN0013784	26-Jun-2024	26-Jun-2027

**Table RE38.1: Test Equipment Used**

**Software Used:** Keysight PXE software A.32.06, EPX test software Version 2023.01.001

**Test Data**

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

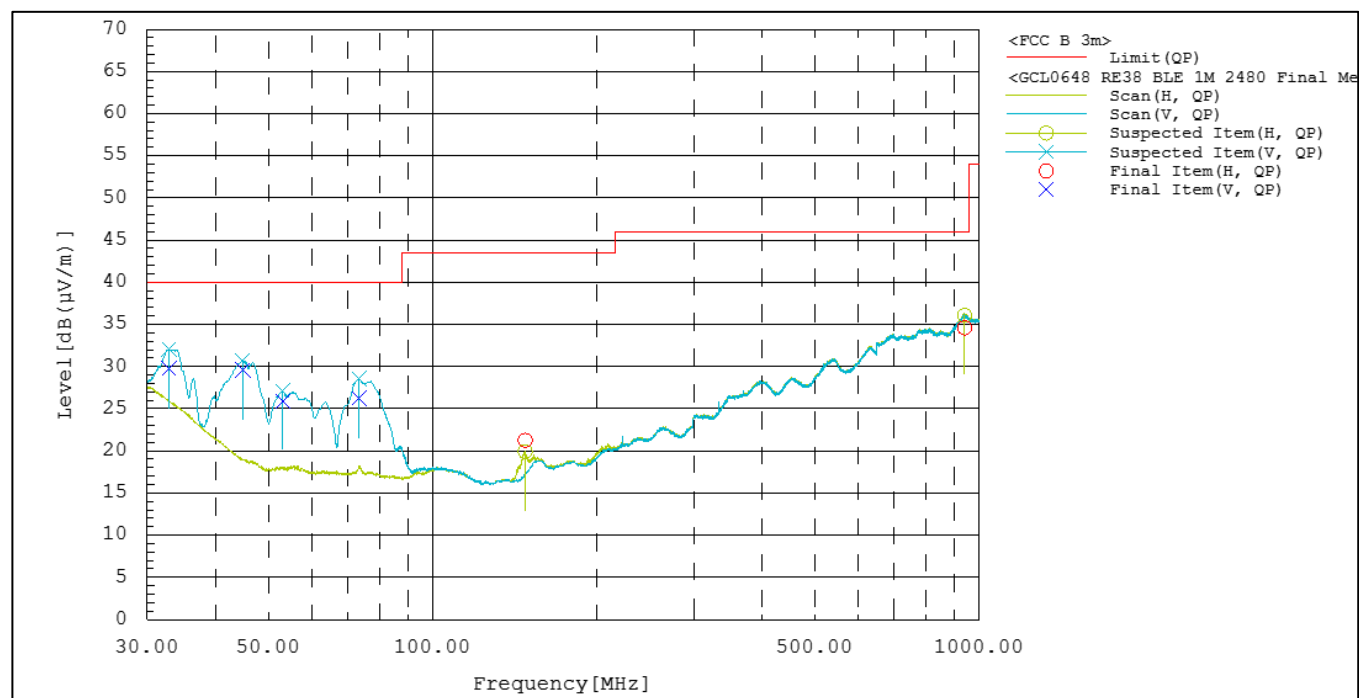
At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 30 MHz and 1 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted in yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency	Pol.	Reading	Factor	Level	Limit	Margin	Height	Angle
MHz		dB( $\mu$ V)	dB(1/m)	dB( $\mu$ V/m)	dB( $\mu$ V/m)	dB	cm	deg
		QP		QP	QP	QP		
32.910	V	9.0	20.8	29.8	40.0	10.2	100.0	359.0
44.910	V	14.8	14.8	29.6	40.0	10.4	100.0	210.0
53.160	V	12.3	13.5	25.8	40.0	14.2	100.0	167.0
73.320	V	12.2	14.0	26.2	40.0	13.8	100.0	6.0
147.660	H	5.0	16.3	21.3	43.5	22.2	213.4	264.0
940.560	H	0.0	34.6	34.6	46.0	11.4	143.1	281.0

**Table RE38.2: Emission summary**

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.



**Figure RE38.1: Spectral data**

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE38.2: EUT test setup, first view

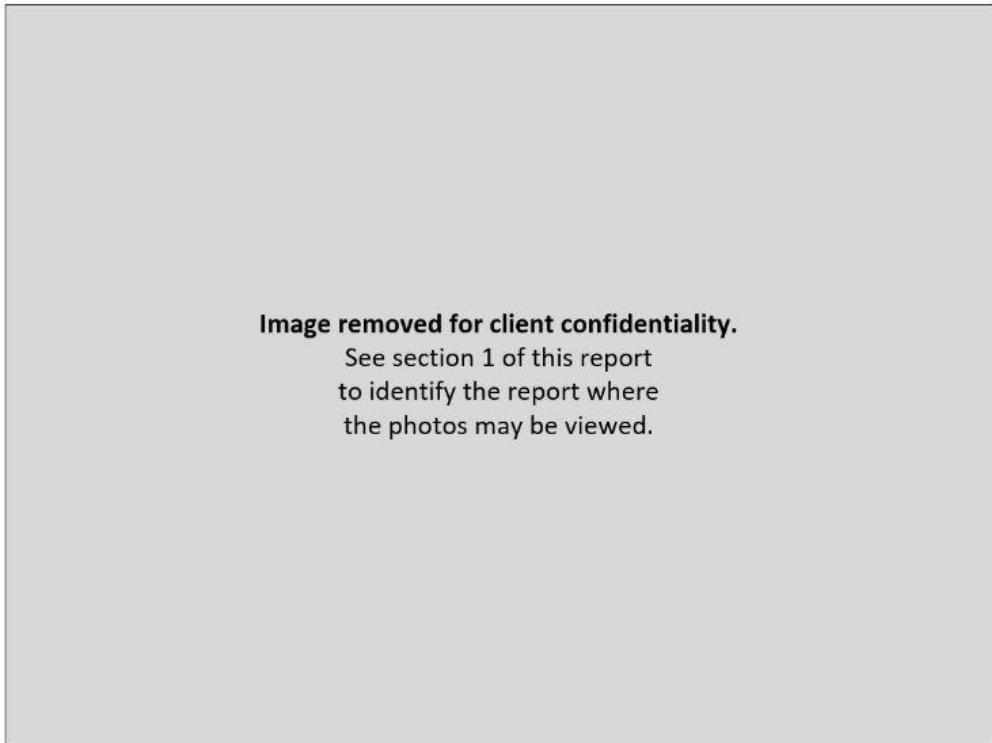


Figure RE38.3: EUT test setup, second view

This line is the end of the test record.

Test Record

Page 43 of 55	GCL Test Report 2024-168	Version A
This report may be reproduced in whole. Reproduction of parts or excerpts requires lab management approval.		
Garmin		

**Radiated Emission Test RE39**  
**Project GCL0648**

Test Date(s) 13 Sep 2024,16 Sep 2024  
Test Personnel David Kerr, Aditya Prakash

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx) (1Mbs)  
Arrangement A2 (Upwr)  
Input Power USB 5 Vdc

Test Standards: FCC Part 15.247, RSS-247, RSS-GEN, ANSI C63.10 (as noted in Section 6 of the report).

Frequency Range: 1 GHz to 14 GHz

**Pass/Fail Judgment: PASS**

**Test record created by:** David A Kerr  
**Date of this record:** 16 Sep 2024

Original record, Version A.

**Test Equipment**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	00259208	30-May-2024	30-May-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-01		Calibration	Not Required
3 GHz High Pass filter	Anatech Electronics	OK0R2	01	Calibration	Not Required

**Table RE39.1: Test Equipment Used**

**Software Used:** Keysight PXE software A.32.06, EPX test software Version 2023.01.001

**Test Data**

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

In the 1 GHz to 14 GHz frequency range, pre-scan spectral data was taken at 1 meter and extrapolated to a 3 meter distance. Final measurements were made at 3 meters.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 1 GHz and 14 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
1722.480	H	31.9	46.0	-6.1	25.8	39.9	54.0	74.0	28.2	34.1	232.0	278.0
1733.920	V	31.8	45.3	-6.0	25.8	39.3	54.0	74.0	28.2	34.7	110.7	0.0
1893.640	V	43.5	64.4	-4.3	39.2	60.1	54.0	74.0	14.8	13.9	184.0	22.0
1905.960	V	31.8	45.7	-4.2	27.6	41.5	54.0	74.0	26.4	32.5	400.0	257.0
2215.720	H	32.7	48.7	-4.0	28.7	44.7	54.0	74.0	25.3	29.3	259.2	37.0
10573.700	H	27.5	41.5	13.0	40.5	54.5	54.0	74.0	13.5	19.5	255.2	86.0

**Table RE39.2: Emission summary (BLE 1Mbps, 2402MHz)**

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
1725.560	H	32.1	45.5	-6.1	26.0	39.4	54.0	74.0	28.0	34.6	211.7	0.0
1893.640	V	32.1	45.6	-4.3	27.8	41.3	54.0	74.0	26.2	32.7	213.2	146.0
1905.080	H	32.1	45.5	-4.2	27.9	41.3	54.0	74.0	26.1	32.7	374.5	119.0
2217.920	H	33.0	48.3	-4.0	29.0	44.3	54.0	74.0	25.0	29.7	327.1	302.0
4591.580	H	31.2	44.8	3.3	34.5	48.1	54.0	74.0	19.5	25.9	362.5	275.0
7320.200	V	29.5	43.3	6.9	36.4	50.2	54.0	74.0	17.6	23.8	100.0	249.0

**Table RE39.3: Emission summary (BLE 1Mbps, 2440MHz)**

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2215.720	H	32.9	48.8	-4.0	28.9	44.8	54.0	74.0	25.1	29.2	328.4	301.0
1907.280	V	32.2	45.7	-4.3	27.9	41.4	54.0	74.0	26.1	32.6	100.0	0.0
8446.100	H	28.3	42.1	9.8	38.1	51.9	54.0	74.0	15.9	22.1	290.9	7.0
10532.660	H	27.3	40.7	12.7	40.0	53.4	54.0	74.0	14.0	20.6	240.5	0.0
3928.460	V	32.6	46.7	0.6	33.2	47.3	54.0	74.0	20.8	26.7	142.4	336.0
12797.960	V	27.3	41.3	14.9	42.2	56.2	54.0	74.0	11.8	17.8	314.8	49.0

**Table RE39.4: Emission summary (BLE 1Mbps, 2480MHz)**

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

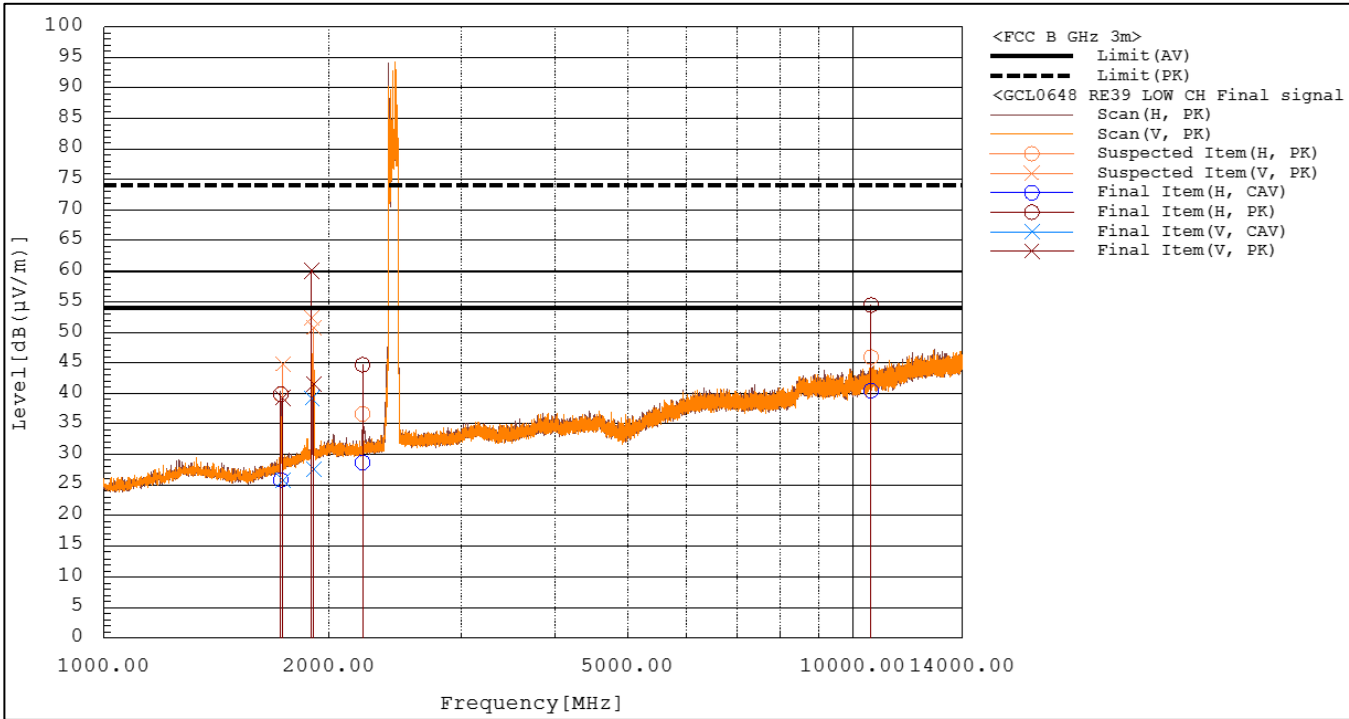


Figure RE39.1: Spectral data (BLE 1Mbps, 2402MHz)

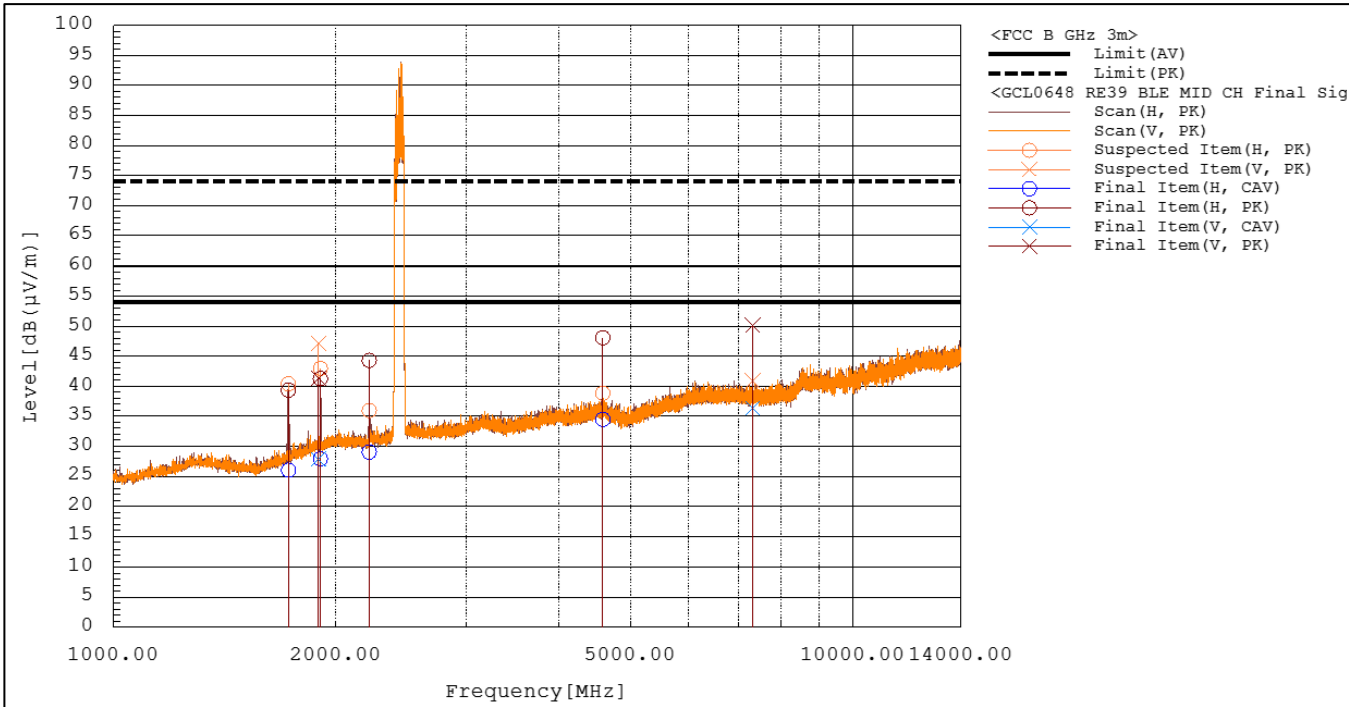


Figure RE39.2: Spectral data (BLE 1Mbps, 2440MHz)

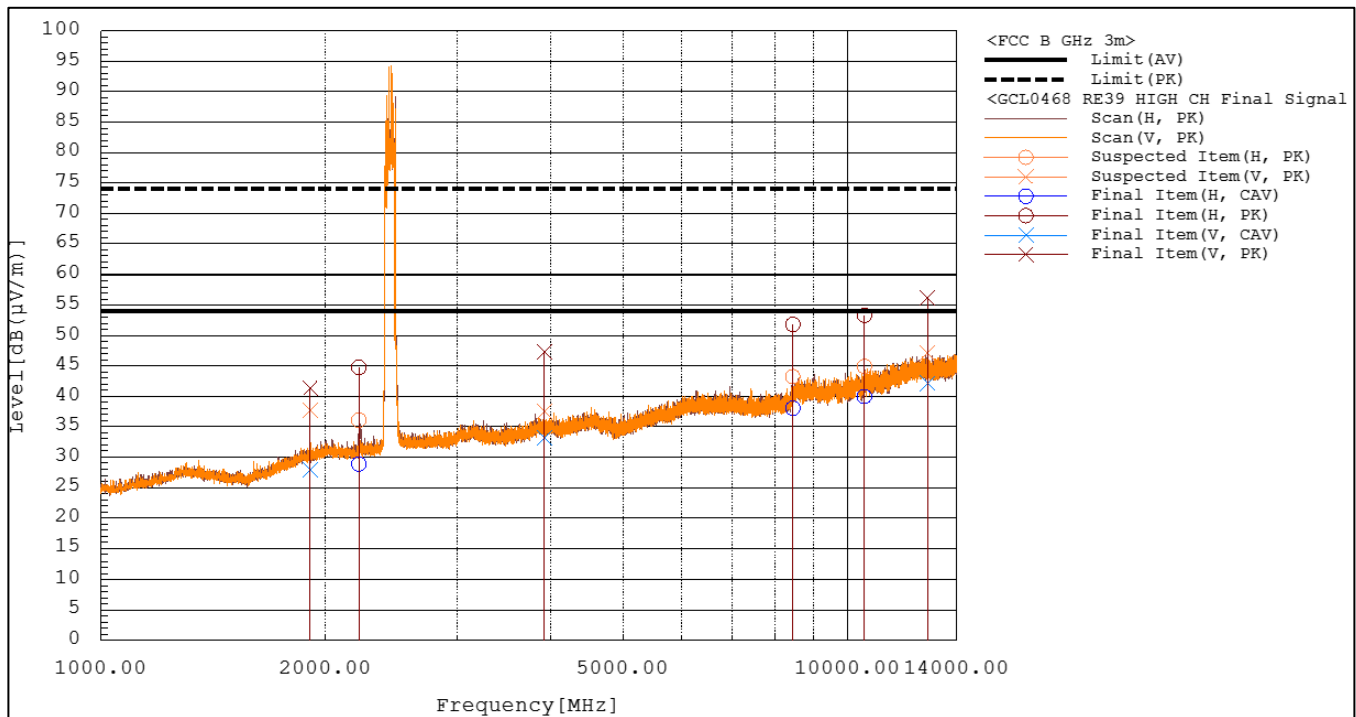


Figure RE39.3: Spectral data (BLE 1Mbps, 2480MHz)

## Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE39.4: EUT test setup, first view (Y orientation)

**Image removed for client confidentiality.**

See section 1 of this report  
to identify the report where  
the photos may be viewed.

**Figure RE39.5: EUT test setup, second view (Y orientation)**

**This line is the end of the test record.**



## Test Record

### Radiated Emission Test RE40

### Project GCL0648

Test Date(s) 19 Sep 2024  
Test Personnel David Kerr, Jim Solum

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx)  
Arrangement A2 (Upwr)  
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247, RSS-GEN (as noted in Section 6 of the report).

Frequency Range: 14 GHz to 25 GHz  
**Pass/Fail Judgment: PASS**

**Test record created by:** Jim Solum  
**Date of this record:** 19 Sep 2024

Original record, Version A.

## Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025
Antenna, Horn, 10-40 GHz	ETS Lindgren	3116C	00259186	29-Apr-2024	29-Apr-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Preamplifier, 18 Ghz to 40 Ghz	Com-Power	PAM-840A	461364	Calibration	Not Required
Shockforce G1 Tape Measure	Crecent Lufkin	L1135CME-02	GMN0013784	26-Jun-2024	26-Jun-2027

**Table RE40.1: Test Equipment Used**

**Software Used:** Keysight PXE software A.33.03, EPX test software Version 2023.01.001

## Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

In the 14 GHz to 26.5 GHz frequency range, pre-scan spectral data was taken at 1 meter and extrapolated to a 3 meter distance. Final measurements were made at 3 meters.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

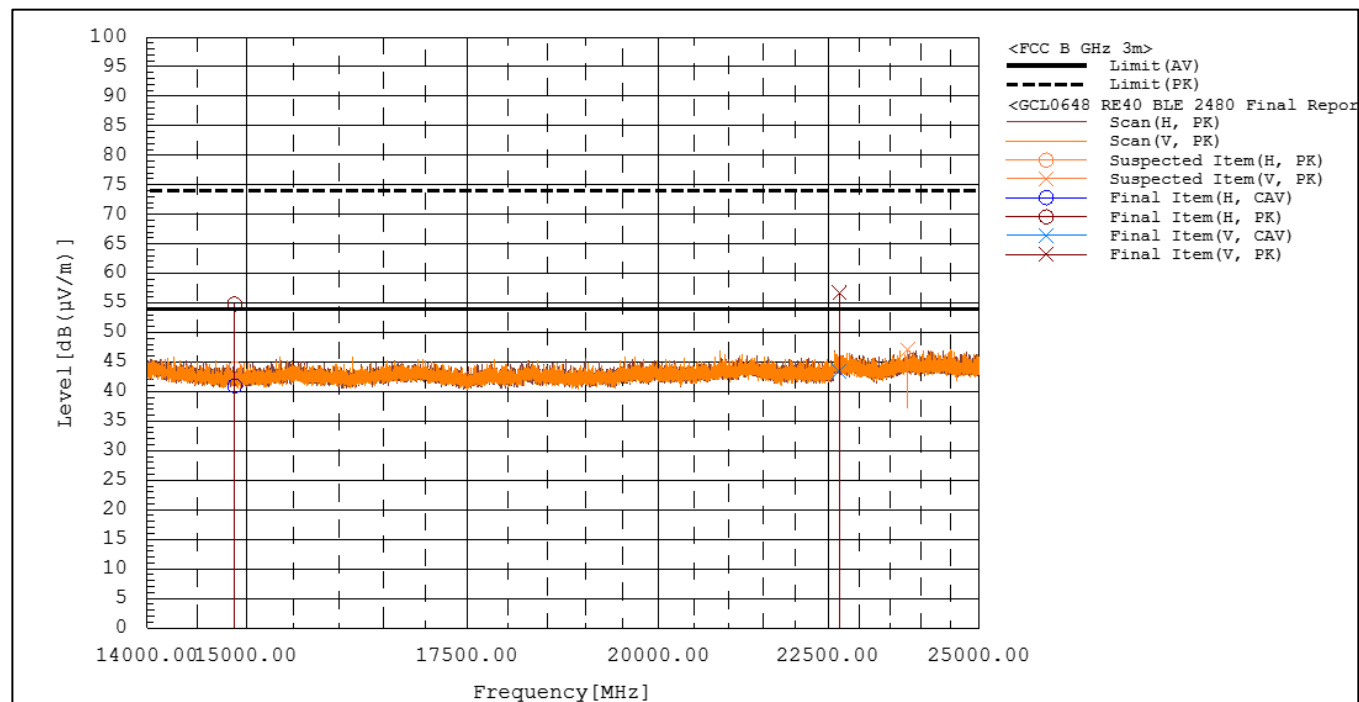
The table shows the selected final measurement data between 14 GHz and 25 GHz. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

In this test, fewer than six emissions were observed within 20 dB of the limit. The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μ V)		dB(1/m)	dB(μ V/m)		dB(μ V/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
14879.750	H	16.3	30.1	24.7	41.0	54.8	54.0	74.0	13.0	19.2	400.0	284.0
22679.200	V	22.4	35.7	21.0	43.4	56.7	54.0	74.0	10.6	17.3	215.7	0.0

**Table RE40.2: Emission summary**

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.



**Figure RE40.1: Spectral data**

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE40.2: EUT test setup, first view

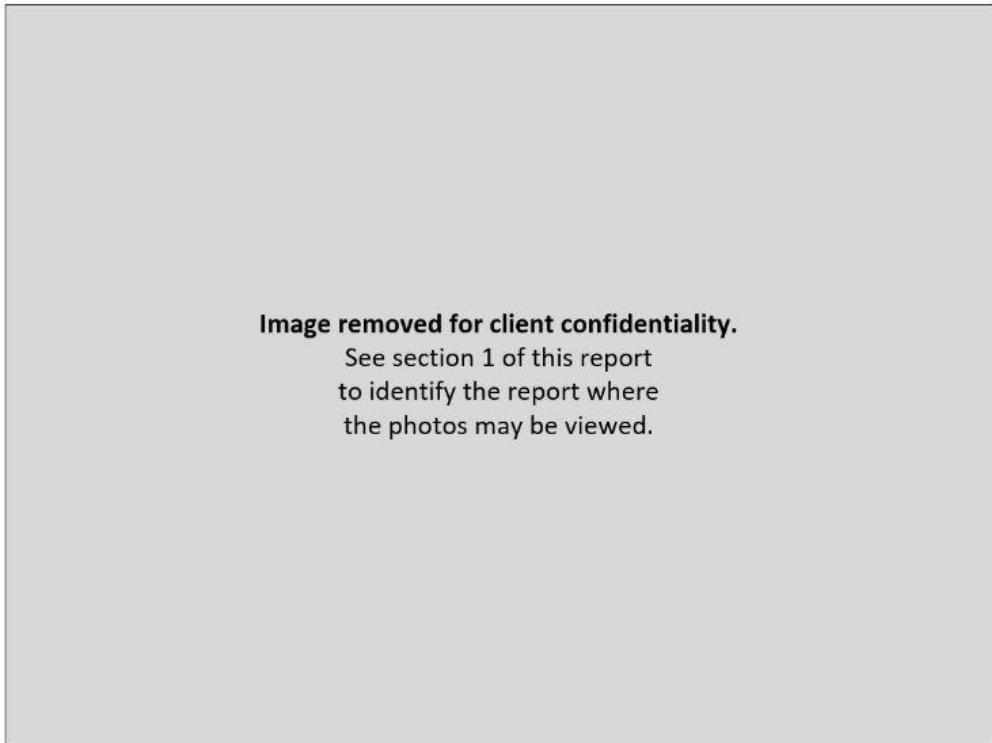


Figure RE40.3: EUT test setup, second view

This line is the end of the test record.

Test Record

Page 51 of 55	GCL Test Report 2024-168	Version A
This report may be reproduced in whole. Reproduction of parts or excerpts requires lab management approval.		
Garmin		

**Conducted Emissions Mains Test CE01**  
**Project GCL0648**

Test Date(s) 19 Sep 2024  
Test Personnel David Kerr

Product Model AA4999  
Serial Number tested 483183211

Operating Mode M3 (BleTx) (2440MHz, 1Mbs)  
Arrangement A2 (Upwr)  
Input Power 120 Vac 60 Hz

Test Standards: FCC Part 15.247, RSS-247, RSS-GEN, ANSI C63.10 (as noted in Section 6 of the report).

Frequency Range: 150 kHz to 30 MHz

**Pass/Fail Judgment: PASS**

**Test record created by:** David A Kerr  
**Date of this record:** 19 Sep 2024

Original record, Version A.

**Test Equipment**

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
LISN multiline; 20A 50uH	Com-Power	LIN-120C	20160005	3-Apr-2024	1-Apr-2027
DMM Multimeter 87V	Fluke	87V	63490051	21-Jun-2024	21-Jun-2025

**Table CE01.1: Test Equipment Used**

**Software Used**

Keysight PXE software A32.06 CE Mains 150k to 30M Data Analysis V3 2024May23.xlsx

**Test Data**

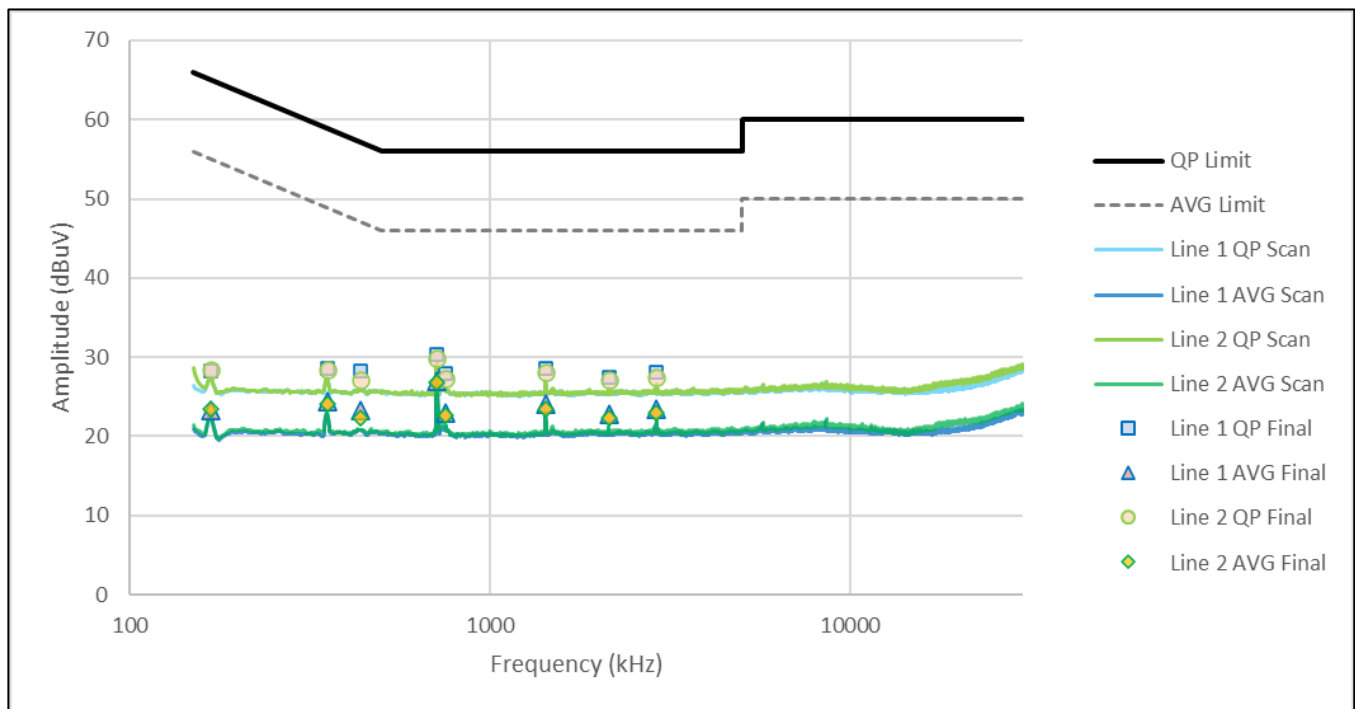
The conducted emission test process began with a set of preliminary scans on both power conductors using both Quasi-Peak and Average detectors across the frequency range. Where the test standard requires cable manipulation, one or more likely worst case frequencies selected by the test personnel. Cables were manipulated to find the maximal signal strength while observing the receiver levels at those selected frequencies. At each of the frequencies selected for final measurements, Quasi-peak and Average detector readings were taken on each conductor.

The table shows the selected final measurement data. It includes at least the six strongest emissions observed relative to the limit lines, along with other data points of interest. The yellow highlight indicate the data points with the least margin to the quasi-peak detector limit and the average detector limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit.

Frequency	QP Limit	AV Limit	L1 QP	L2 QP	L1 AV	L2 AV	QP Margin	AV Margin
(kHz)	(dBμV)	(dBμV)	(dBμV)	(dBμV)	(dBμV)	(dBμV)	(dB)	(dB)
168	65.06	55.06	28.26	28.43	23.33	23.43	36.63	31.63
353	58.90	48.90	28.62	28.46	24.45	24.06	30.28	24.46
438	57.10	47.10	28.28	27.12	23.34	22.34	28.82	23.76
713	56.00	46.00	30.27	29.94	26.99	26.81	25.73	19.01
753	56.00	46.00	27.89	27.35	22.94	22.64	28.11	23.06
1426	56.00	46.00	28.61	28.07	24.07	23.51	27.39	21.93
2137	56.00	46.00	27.50	27.19	22.85	22.39	28.50	23.15
2897	56.00	46.00	28.10	27.45	23.49	22.91	27.90	22.51

**Table CE01.1: Emission summary**

The graph below shows preliminary scan data as continuous curves. Superimposed are the final measurement data points reported in the table above.



**Figure CE01.1: Spectral data**

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure CE01.2: Test setup, first view

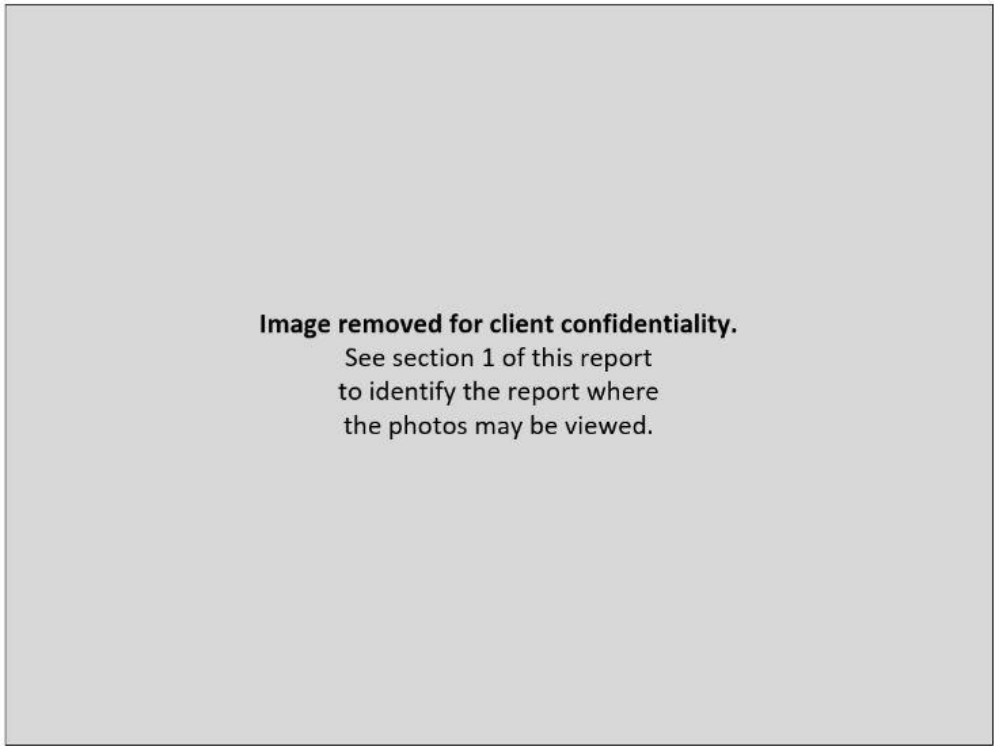


Figure CE01.3: Test setup, second view

This line is the end of the test record.

**Concluding Notes**

This report stands as an integrated record of the tests performed and must be copied or distributed in its complete form. The reproduction of selected pages or sections separate from the complete report would require specific approval from the manager of the Garmin Compliance Lab.

**This is the final page of the report.**