The transmitting signal consists of a few transmissions 78.8 msec long each (see Plots 4.1.1, 4.1.2, pages 11,12 of our test report TADRAD_FCC.14175) with approximately 160 msec time interval between them. Upon this, only one entire transmission may fall in 100 msec window, as defined in §15.35 of the FCC rules. Each transmission, in turn, is pulse modulated with 50% duty cycle carrier (for this you can see Plots 4.1.3, 4.1.4, which are stretched plots of Plot 4.1.2).
The total T_x ON time within 100 msec window will be calculated as follows:

$T_{x\ ON}$= Transmission duration × Duty cycle = 78.8 × 0.5 = 39.4 msec

Average factor = 20 log($T_{x\ ON}$/100) = -8.09 dB

Transmission ON-OFF sequence explanation.