

Sesamsec GmbH  
Finsterbachstraße 1  
86504 Merching  
Germany  
Tel.: +49 8233 79445-0

240028-AU04+W05

Sesamsec GmbH  
RFID reader / writer  
Secustos MU20 LEGIC  
(EUT operated via USB)

47 CFR Part 15, §15.209  
RSS-210

**Accreditation:**

FCC test firm accreditation expiration date: 2025-09-19  
MRA US-EU, FCC designation number: DE0010  
Test firm registration number: 997268  
FCC Registration Number (FRN): 0032245045  
BNetzA-CAB-02/21-02/7 Valid until 2028-11-26

Recognized until 2025-03-16 by the  
Department of Innovation, Science and Economic Development Canada (ISED)  
as a recognized testing laboratory  
CAB identifier: DE0011  
Company number: 3472A

**Location of Testing:**

Element Materials Technology Straubing GmbH  
Tel.: +49 9421 56868-0  
Fax: +49 9421 56868-100  
Email: [info.straubing@element.com](mailto:info.straubing@element.com)  
Gustav-Hertz-Straße 35  
94315 Straubing, Germany

The technical accuracy is guaranteed through the quality management of  
Element Materials Technology Straubing GmbH.

This document may be reproduced only in its entirety and without change.  
The results contained in this document relate only to the item(s) tested

## Table of contents

1	Summary of test results .....	5
2	Referenced publications .....	6
3	Equipment under test (EUT) .....	7
3.1	General information .....	7
3.2	Radio specifications .....	8
3.3	Photo documentation .....	8
4	Test configuration and mode of operation .....	9
4.1	Test configuration .....	9
4.2	Mode of operation .....	9
5	Test procedures .....	10
5.1	General specifications .....	10
5.2	AC power line conducted emission .....	10
5.3	Radiated emissions below 30 MHz .....	12
5.4	Radiated emissions from 30 MHz to 1 GHz .....	15
5.5	Radiated emissions above 1 GHz .....	18
5.6	Bandwidth measurements .....	21
6	Test results .....	22
6.1	AC power line conducted emissions 150 kHz to 30 MHz .....	23
6.2	Occupied bandwidth .....	27
6.3	Radiated emissions below 30 MHz .....	29
6.4	Radiated emissions from 30 MHz to 1 GHz .....	33
6.5	Radiated emissions > 1 GHz .....	37
7	Measurement uncertainties .....	41
8	Revision history .....	42

## List of figures

Figure 1: Setup for AC power-line conducted emissions test from 150 kHz to 30 MHz .....	11
Figure 2: Setup for radiated emissions test below 30 MHz .....	14
Figure 3: Setup for radiated emissions test from 30 MHz to 1 GHz .....	17
Figure 4: Setup for radiated emissions test above 1 GHz .....	20
Figure 5: Chart of AC powerline conducted emissions on L1 .....	25
Figure 6: Chart of AC powerline conducted emissions on N .....	26
Figure 7: Chart of occupied bandwidth test, with tag .....	28
Figure 8: Chart of radiated emissions test below 30 MHz, EUT position Y, antenna polarization parallel, without tag .....	31
Figure 9: Chart of radiated emissions test from 30 MHz to 1 GHz, EUT position Y, with tag, antenna vertical .....	35
Figure 10: Chart of radiated emissions pre-measurement from 1 GHz to 12.5 GHz, EUT position Y, without tag, antenna polarization vertical .....	39

---

## List of tables

Table 1: EUT used for testing .....	9
Table 2: Support equipment used for testing .....	9
Table 3: Bandwidth and detector type for AC power-line conducted emissions test .....	10
Table 4: Sample calculation .....	11
Table 5: Recalculation factors for extrapolation .....	12
Table 6: Bandwidth and detector type for radiated emissions test below 30 MHz.....	12
Table 7: Sample calculation .....	13
Table 8: Bandwidth and detector type for radiated emissions test from 30 MHz to 1 GHz .....	15
Table 9: Sample calculation .....	15
Table 10: Sample calculation .....	18
Table 11: Bandwidth and trace settings for exploratory radiated emissions test above 1 GHz.....	18
Table 12: Bandwidth and detector type for final radiated emissions test above 1 GHz.....	19
Table 13: Limits for AC powerline conducted emissions according to § 15.207(a) and RSS-Gen, section 8.8 .....	24
Table 14: Results of AC powerline conducted emissions on L1 .....	25
Table 15: Results of AC powerline conducted emissions on N.....	26
Table 16: Results of occupied bandwidth test, with tag .....	28
Table 17: General radiated emission limits up to 30 MHz according to §15.209.....	30
Table 18: General radiated emission limits up to 30 MHz according to section 8.9 of RSS Gen .....	30
Table 19: Final results of radiated emissions test below 30 MHz according to § 15.209, without tag.....	32
Table 20: Final results of radiated emissions test below 30 MHz according to RSS-210, without tag .....	32
Table 21: General radiated emission limits $\geq$ 30 MHz according to §15.209 and RSS-Gen .....	34
Table 22: Results of radiated emissions test from 30 MHz to 1 GHz, with tag .....	36
Table 23: General radiated emission limits above 960 MHz according to §15.209 and RSS-Gen .....	38
Table 24: Results of radiated emissions test > 1 GHz, without tag.....	40

## 1 Summary of test results

System type: RFID Reader

47 CFR part and section	Test	Equivalent to IC radio standard(s)	Result	Note(s)	Page
15.207(a)	AC power line conducted emissions 150 kHz to 30 MHz	RSS-Gen, section 8.8	Passed	2	23
---	Occupied bandwidth	RSS-Gen, section 6.7	Recorded	---	27
15.209(a)	Radiated emissions below 30 MHz	RSS-210 section 7.3	Passed	---	29
15.209(a)	Radiated emissions from 30 MHz to 1 GHz	RSS-210 section 7.3	Passed	---	33
15.209(a)	Radiated emissions > 1 GHz	RSS-210 section 7.3	Passed	3, 4	37

Note(s):

- 1 For information about EUT see clause 3.
- 2 Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.
- 3 Not applicable if the 10<sup>th</sup> harmonic of the intentional transmitter is below 1 GHz (please see 47 CFR Part 15, section 15.33(a)(1), and RSS-Gen, section 6.13.2(a))
- 4 According to 47 CFR Part 15, §15.33 (a)(5) and RSS-Gen, section 6.13.2 (d), the frequency range of investigation for the digital device shall be used if the range of investigation determined by the highest internal frequency of the digital device is higher than the 10<sup>th</sup> harmonic of the intentional radiator

Straubing, August 14, 2024



Tested by  
Patricio Montenegro, M.Sc.-Ing.  
Radio Test Engineer



Approved by  
Konrad Graßl  
Reviewer

## 2 Referenced publications

<i>Publication</i>	<i>Title</i>
CFR 47 Part 2 October 2023	Code of Federal Regulations, Title 47 (Telecommunication), Part 2 (Frequency allocation and radio treaty matters; General rules and regulations) of the Federal Communication Commission (FCC)
CFR 47 Part 15 October 2023	Code of Federal Regulations, Title 47 (Telecommunication), Part 15 (Radio Frequency Devices) of the Federal Communication Commission (FCC)
ANSI C63.10 June 2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
KDB 174176 D01 June 3, 2015	AC power-line conducted emissions Frequently Asked Questions
RSS-Gen Issue 5 April 2018 Amendment 1 (March 2019) Amendment 2 (February 2021)	Spectrum Management and Telecommunications - Radio Standards Specification - General Requirements for Compliance of Radio Apparatus
RSS-210 Issue 10, December 2019 Amendment (April 2020)	Spectrum Management and Telecommunications Radio Standards Specification Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment

### 3 Equipment under test (EUT)

All Information in this clause is declared by customer.

#### 3.1 General information

Product type:	RFID reader / writer		
Model name:	Secustos MU20 LEGIC		
Serial number(s):	N/A		
Applicant:	Sesamsec GmbH		
Manufacturer:	Sesamsec GmbH		
Hardware version:	Rev B		
Software version:	TWN4/B1.50/NKD4.70/CONT1.26/BSD		
Short description:	EUT is a RFID reader / writer operating at the frequencies 125 kHz and 13.56 MHz. BLE is additionally integrated. In this test report only RFID working at 125 kHz is in consideration.		
Additional modifications:	3 ferrites with the item number 742 711 11 of the manufacturer Würth were fixed around the USB cable. 2 ferrites were attached to the end of the cable that is plugged into the laptop and 1 ferrite was attached to the end of the cable that is plugged into the EUT.		
FCC ID:	2BAACMU20LE		
IC registration number:	30098-MU20LE		
Designation of emissions:	19K8K1D--		
Power supply:	DC supply (powered via USB)		
	Nominal voltage:	5.0 V	
	Minimum voltage:	4.7 V	
	Maximum voltage:	5.8 V	
Temperature range:	-25°C to +70 °C (Declared by customer)		
Device type:	<input type="checkbox"/> Portable	<input type="checkbox"/> Mobile	<input checked="" type="checkbox"/> Fixed

## 3.2 Radio specifications

System type:	RFID Reader		
Application frequency band:	n/a		
Operating frequency:	125 kHz		
Number of RF channels	1		
Highest internal frequency:	2480 MHz (BLE)		
Modulation	ASK		
Antenna:	Type:	Magnetic loop antenna	
	Inductance:	490 $\mu\text{H} \pm 5\%$	
	Diameter of wire:	0.11 mm	
	Turns:	135, max 140	
		Coil is fixed by using backed wire	
		Leadfree and RoHS conform	
	Connector:	<input type="checkbox"/> external	<input type="checkbox"/> internal
		<input type="checkbox"/> temporary	<input checked="" type="checkbox"/> none (integral antenna)

## 3.3 Photo documentation

Photos taken during testing including EUT positions can be found in annex A.  
For external photos of the EUT see annex B, for internal ones see annex C.

.



## 4 Test configuration and mode of operation

### 4.1 Test configuration

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID reader / writer	Secustos MU20 LEGIC	N/A	Sesamsec GmbH

Table 1: EUT used for testing

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID-tag	125 kHz	---	Sesamsec GmbH
Laptop	Latitude 3410	98DY103	Dell
Power supply for laptop	LA65NS2-01	---	DELL
USB cable	---	---	---

Table 2: Support equipment used for testing

### 4.2 Mode of operation

- The device was powered by a laptop via USB.
- All tests were performed with a supply voltage of 5 V (normal USB connection to the laptop).
- By means of the test software “AppBlaster V4.05.04” the EUT was set in continuous interrogation mode at 125 kHz.

## 5 Test procedures

### 5.1 General specifications

#### 5.1.1 Test setups

Tabletop devices are placed on a non-conductive table with a height of 0.8 m. In case of AC power-line conducted emissions test, the rear of the EUT is located 40 cm to the vertical wall of the RF-shielded (screened) room which is used as vertical conducting plane. For radiated emission measurements above 1 GHz, tabletop devices are placed at a height of 1.5 m above the floor using a support made of styrene placed on top of the non-conductive table.

Floor-standing devices are placed either directly on the reference ground-plane or on insulating material (see clause 6.2.3 of ANSI C63.10-2013 for more details).

All other surfaces of tabletop or floor-standing EUTs are at least 80 cm from any other grounded conducting surface. This includes the case or cases of one or more LISNs when performing an AC power-line conducted emissions test.

Radiated emission measurements of equipment that can be used in multiple orientations (e.g. portable or handheld devices) are performed with the EUT in each of three orthogonal axis positions.

### 5.2 AC power line conducted emission

AC power-line conducted emissions are measured according to clause 6.2 of ANSI C63.10 over the frequency range from 150 kHz to 30 MHz to determine the line-to-ground radio-noise voltage that is conducted from all of the EUT current-carrying power input terminals that are directly (or indirectly via separate transformers or power supplies) connected to a public power network. The tests are performed in a shielded room.

If the EUT normally receives power from another device that in turn connects to the public utility ac power lines, measurements are made on that device with the EUT in operation to demonstrate that the device continues to comply with the appropriate limits while providing the EUT with power. If the EUT is operated only from internal or dedicated batteries, with no provisions for connection to the public utility ac power lines (600 VAC or less) to operate the EUT (such as an adapter), then ac power-line conducted measurements are not required.

For direct current (dc) powered devices where the ac power adapter is not supplied with the device, an “off-the-shelf” unmodified ac power adapter is used. If the device is supposed to be installed in a host (e.g., the device is a module or PC card), then it is tested in a typical compliant host.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
150 kHz ≤ f < 30 MHz	9 kHz	≤ 4.5 kHz	Peak, Average	Quasi-peak, Average	Quasi-peak, Average

Table 3: Bandwidth and detector type for AC power-line conducted emissions test

The AC power-line conducted emissions test is performed in the following steps:

- The EUT is arranged as tabletop or floor-standing equipment, as applicable, and connected to a line impedance stabilization network (LISN) with 50  $\mu$ H / 50  $\Omega$ . If required, a second LISN of the same type and terminated by 50  $\Omega$  is used for peripheral devices. The EUT is switched on.

- b) The measurement equipment is connected to the LISN for the EUT and set-up according to the specifications of the test (see table 3). At the LISN, the neutral line is selected to be tested.
- c) The prescan is performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescan, but not for final scan.
- d) When the prescan is completed, maximum levels with less margin than 10 dB or exceeding the limit are determined and collected in a list.
- e) With the first frequency of the list selected, a frequency zoom over a range of ten times of the measurement receiver bandwidth around this frequency is performed. If the EUT has no significant drift in frequency, the frequency zoom can be skipped.
- f) For final scan, the emission level is measured and the maximum is recorded.
- g) Steps e) to f) are repeated for all other frequencies in the list. At least the six highest EUT emissions relative to the limit have to be recorded.
- h) Steps c) to g) are repeated for all current-carrying conductors of all of the power cords of EUT, i.e. all phase and (if used) neutral line(s).

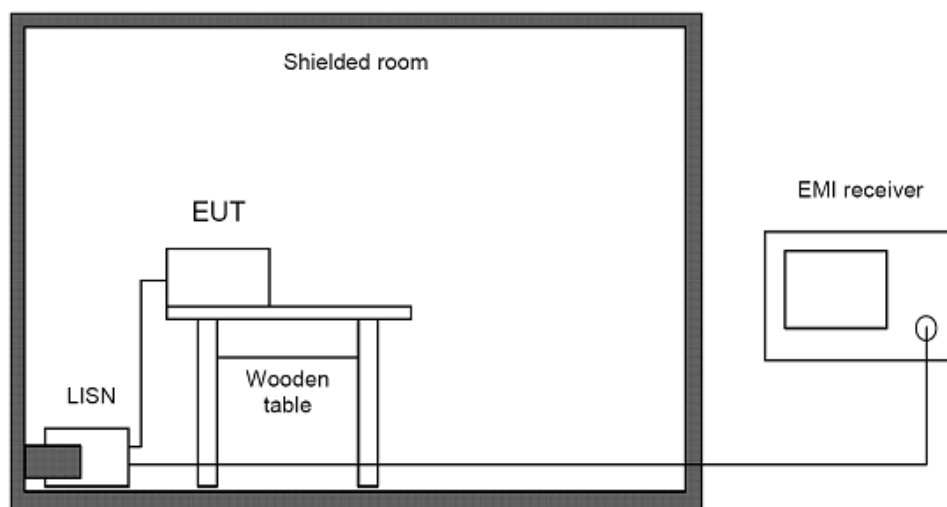


Figure 1: Setup for AC power-line conducted emissions test from 150 kHz to 30 MHz

Phase	Frequency (MHz)	Reading value (dB $\mu$ V)	AMN correction (dB)	Cable attenuation + 10 dB attenuator (dB)	Correction factor (Corr.) (dB)	Level (dB $\mu$ V/m)
L 1	10	10	0.6	10.9	11.5	21.5
N	10	10	1.0	10.9	11.9	21.9

Table 4: Sample calculation

Correction factor = Artificial mains network correction + Cable attenuation + 10 dB

Level = Reading value + Correction factor = 10 dB $\mu$ V + 11.5 dB = 21.5 dB $\mu$ V

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

### 5.3 Radiated emissions below 30 MHz

Radiated emissions below 30 MHz are measured according to clause 6.4 of ANSI C63.10 using an inductive shielded loop antenna. As this antenna measures the magnetic field only, its antenna factors are converted to electric field strength values assuming a free space impedance of  $377 \Omega$  as described in clause 4.3.1 of ANSI C63.10. This results in an additional correction of 51.53 dB.

According to clause 6.4.3 of ANSI C63.10, at frequencies below 30 MHz, measurements may be performed at a distance closer than that specified in the requirements. In this case, the results are extrapolated to the specified distance by using a recalculation factor determined according to one of the methods described in clause 6.4.4 of ANSI C63.10, provided that the maximum dimension of the device is equal to or less than 0.625 times the wavelength at the frequency being measured. As the minimum wavelength is 10 meters corresponding to the maximum frequency of 30 MHz, this requirement is fulfilled if the maximum dimension of the device is equal to or less than 6.25 meters.

Unless otherwise stated, the recalculation factor is determined according to clause 6.4.4.2 “Extrapolation from the measurement of a single point” of ANSI C63.10:

$$\begin{aligned} d_{\text{near field}} &= 47.77 / f_{\text{MHz}}, \text{ or} \\ f_{\text{MHz}} &= 47.77 / d_{\text{near field}} \end{aligned}$$

The frequency  $f_{\text{MHz}}$  at which the near field distance is equal to the limit and/or test distance is important for selection of the right formula to determine the recalculation factor:

$$\begin{aligned} f_{\text{MHz}}(300 \text{ m}) &\approx 0.159 \text{ MHz} \\ f_{\text{MHz}}(30 \text{ m}) &\approx 1.592 \text{ MHz} \\ f_{\text{MHz}}(3 \text{ m}) &\approx 15.923 \text{ MHz} \end{aligned}$$

Based on the test distances for the general radiated emission limits as specified in §15.209 of 47 CFR Part 15 or RSS-Gen, the following formulas are used to determine the recalculation factor:

Frequency (f)	$d_{\text{limit}}$	$d_{\text{measure}}$	Formula for recalculation factor
9 kHz $\leq$ f $\leq$ 159 kHz 490 kHz $<$ f $\leq$ 1.592 MHz	300 m 30 m	3 m	$-40 \log(d_{\text{limit}} / d_{\text{measure}})$
159 kHz $<$ f $\leq$ 490 kHz 1.592 MHz $<$ f $\leq$ 15.923 MHz	300 m 30 m	3 m	$-40 \log(d_{\text{near field}} / d_{\text{measure}}) - 20 \log(d_{\text{limit}} / d_{\text{near field}})$
f $>$ 15.923 MHz	30 m	3 m	$-20 \log(d_{\text{limit}} / d_{\text{measure}})$

Table 5: Recalculation factors for extrapolation

The radiated measurements below 30 MHz are performed in a fully anechoic room (called “CDC”). The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 6.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type
9 kHz $\leq$ f $<$ 150 kHz	200 Hz	$\leq$ 100 Hz	Peak Quasi-peak Aerage
150 kHz $\leq$ f $<$ 30 MHz	9 kHz	$\leq$ 4.5 kHz	Peak Quasi-peak Aerage

Table 6: Bandwidth and detector type for radiated emissions test below 30 MHz

<i>Frequency</i> (MHz)	<i>Reading value</i> (dBμV)	<i>Antenna correction</i> (dB/m)	<i>Cable attenuation</i> (dB)	<i>Correction factor (Corr.)</i> (dB)	<i>Level</i> (dBμV/m)
10	20.00	19.59	0.33	19.92	39.92

Table 7: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 20 dBμV + 19.92 dB = 39.92 dBμV/m

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

The radiated emissions test below 30 MHz is performed in the following steps:

### 5.3.1 Automatic test method

- The loop antenna is positioned with its plane perpendicular to the ground with the lowest height of the antenna 1 m above the ground.
- The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- The measurement equipment is connected to the loop antenna and set-up according to the specifications of the test (see table 6).
- The EUT is turned to a position likely to get the maximum and the test antenna is rotated to detect the maximum of the fundamental in this EUT position.
- Then the EUT is rotated in a horizontal plane through 360° in steps of 20°. Starting at 0°, at each table position the spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the current table position is noted as the maximum position.
- After the last prescan, the significant maximum emissions and their table positions are determined and collected in a list.
- With the test receiver set to the first frequency of the list, the EUT is rotated by ±180° around the table position found during prescans while measuring the emission level continuously. For final scan, the worst-case table position is set and the maximum emission level is recorded.
- Step g) is repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to h) are repeated in two other orthogonal positions.

### 5.3.2 Manual test method

- a) The loop antenna is positioned with its plane perpendicular to the ground with the lowest height of the antenna 1 m above the ground.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the loop antenna and set-up according to the specifications of the test (see table 6).
- d) The EUT is turned to a position likely to get the maximum and the test antenna is rotated to detect the maximum of the fundamental in this EUT position.
- e) Then the EUT is rotated in a horizontal plane through 360° continuously. The scan table method in receiver mode of the measurement instrument is used for pre-measurements. The max hold function is used.
- f) After the last prescan, the significant maximum emissions are determined and collected in a list.
- g) Final scan: the test receiver is set in the bargraph max hold function and is set to the first frequency of the list, the EUT is rotated by 360° while measuring the emission level continuously. The worst-case table position and the maximum emission level is recorded.
- h) Step g) is repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to h) are repeated in two other orthogonal positions.

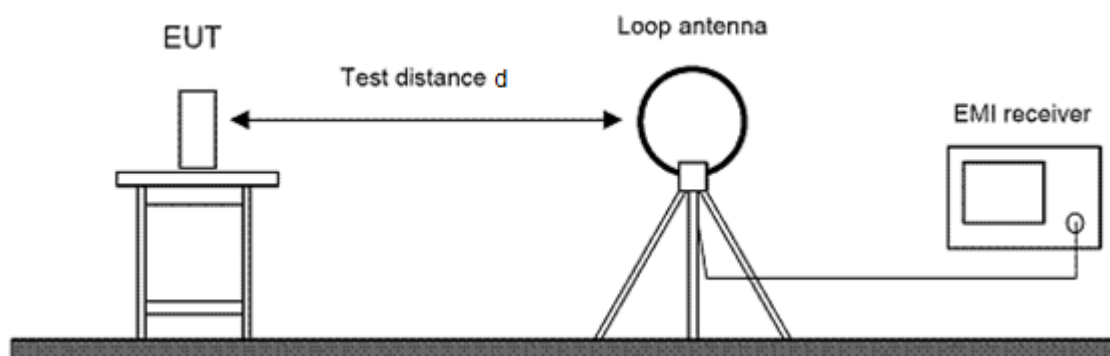


Figure 2: Setup for radiated emissions test below 30 MHz

## 5.4 Radiated emissions from 30 MHz to 1 GHz

Radiated emissions in the frequency range 30 MHz to 1 GHz are measured according to clause 6.5 of ANSI C63.10 using a semi-anechoic chamber (SAC) with a ground plane on the floor. The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 8.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
30 MHz $\leq f \leq$ 1 GHz	120 kHz	$\leq$ 60 kHz	Peak	Quasi-peak	Quasi-peak

Table 8: Bandwidth and detector type for radiated emissions test from 30 MHz to 1 GHz

Frequency (MHz)	Reading value (dB $\mu$ V)	Antenna correction (dB/m)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dB $\mu$ V/m)
100	30.00	11.71	1.06	12.77	42.77

Table 9: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 30 dB $\mu$ V + 12.77 dB = 42.77 dB $\mu$ V/m

The measurement antenna is a combination of a biconical antenna and a logarithmic-periodic dipole array antenna. It is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and in a height between 1 m and 4 m above the ground plane.

If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The radiated emissions test from 30 MHz to 1 GHz is performed in the following steps:

### 5.4.1 Automatic test method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 8).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
- g) The antenna height is increased to 4 m in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from 4 m to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) The EUT is rotated in a horizontal plane through 360° in steps of 20°. At each table position, steps e) to i) are repeated.
- k) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- l) With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- m) The antenna is moved at a height from 1 m to 4 m and the EUT is rotated through 360° while measuring the emission level continuously.
- n) The worst-case positions of antenna and table and the maximum emission level are recorded.
- o) Steps l) to n) are repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

### 5.4.2 Manual test method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 8).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded while the EUT is rotated in a horizontal plane through 360° continuously. The measurement is performed with peak detector and max hold.
- g) The antenna height is increased to 4 m in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from 4 m to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna are determined and collected in a list.
- k) For the final scan the test receiver is set to the first frequency of the list. By using the bargraph max hold function of the measurement receiver the emission in consideration is maximised by rotating the EUT in the horizontal plane through 360° and moving the antenna from 1 m to 4 m.
- l) The worst-case positions of antenna and table and the maximum emission level are recorded.
- m) Steps k) to l) are repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to m) are repeated in two other orthogonal positions.



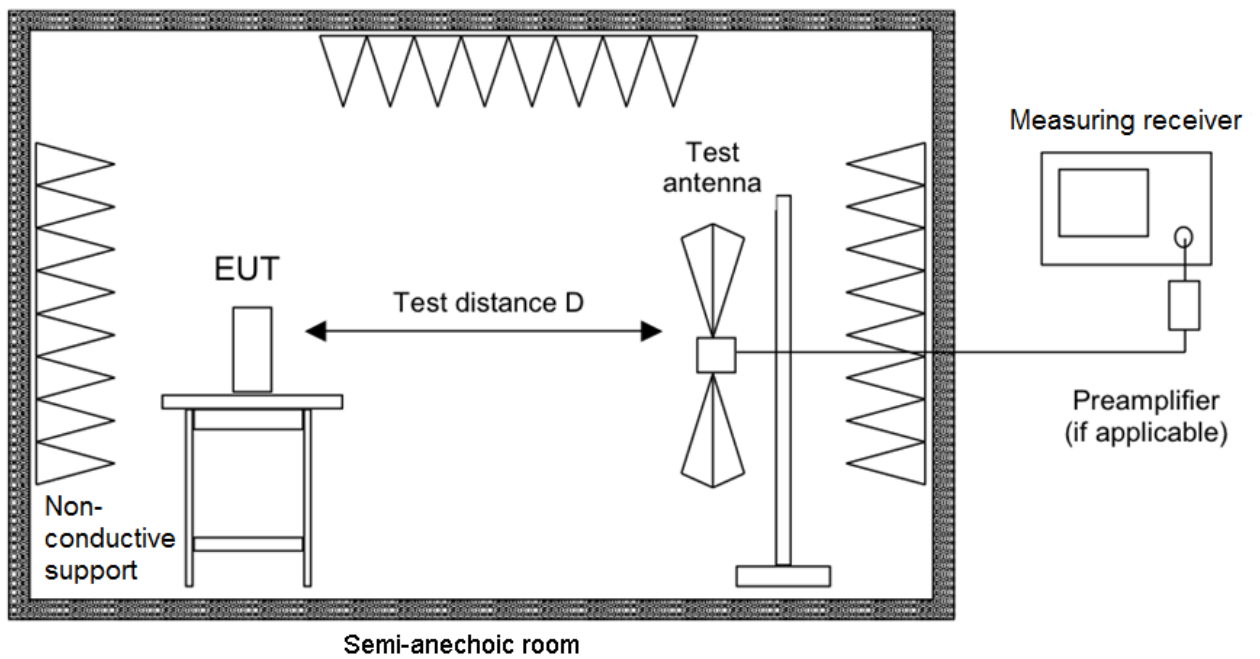


Figure 3: Setup for radiated emissions test from 30 MHz to 1 GHz

## 5.5 Radiated emissions above 1 GHz

Radiated emissions above 1 GHz are measured according to clause 6.6 of ANSI C63.10 by conducting exploratory and final radiated emission tests. According to clause 6.6.4.1 of ANSI C63.10, measurements may be performed at a distance closer than that specified in the requirements. However, an attempt shall be made to avoid making final measurements in the near field of both the measurement antenna and the EUT.

For measurement of radiated emissions above 1 GHz, horn antennas are used.

Test chamber	Frequency (MHz)	Reading value (dBμV)	Antenna correction (dB/m)	Correction pre-amplifier (dB)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dBμV/m)
SAC3	2400	50.00	27.76	-47.91	5.24	-14.92	35.08
FS-SAC	2400	50.00	27.76	-34.57	3.51	-3.30	46.70

Table 10: Sample calculation

Correction factor = Antenna correction + Correction pre-amplifier + Cable attenuation

SAC3:

Level = Reading value + Correction factor = 50.00 dBμV - 14.92 dB/m = 35.08 dBμV/m

FS-SAC:

Level = Reading value + Correction factor = 50.00 dBμV - 3.30 dB/m = 46.70 dBμV/m

### 5.5.1 Exploratory radiated emissions measurements

Exploratory radiated emissions above 1 GHz are measured in a semi-anechoic chamber with RF absorbing material on the floor or a fully anechoic room. They are performed by moving the receiving antenna over all sides of the EUT at a closer distance (e.g. 0.5 or 1 m) while observing the display of the test receiver to find the emissions to be re-tested during final radiated emission measurements.

According to clause 5.3.3 of ANSI C63.10, when performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade of distance (inverse of linear distance for field-strength measurements). To simplify testing and documentation, the limits are increased accordingly instead of decreasing the results.

The emissions of the EUT are displayed and recorded with an EMI test receiver operating in the spectrum analyzer mode using the settings as described in table 11.

Frequency (f)	Resolution bandwidth	Video bandwidth	Sweep time	Trace detector(s)
f ≥ 1 GHz	1 MHz	3 MHz	AUTO	Max Peak, Average

Table 11: Bandwidth and trace settings for exploratory radiated emissions test above 1 GHz

If during exploratory radiated emissions measurements no levels to be re-tested are found, the final radiated emissions measurement may be omitted. In this case, the chart of the exploratory radiated emissions measurements has to be reported.

## 5.5.2 Final radiated emissions measurements

Final radiated emissions above 1 GHz are measured in the semi-anechoic chamber (SAC3) or Free space semi-anechoic chamber (FS-SAC) with RF absorbing material on the floor between measurement antenna and EUT. The measurement distance is 3 meters in the semi-anechoic chamber (SAC3) or 1.5 m in the Free space semi-anechoic chamber (FS-SAC). The emissions of the EUT are recorded with an EMI test receiver configured as described in table 12.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type	
			Prescan	Final scan
$f \geq 1 \text{ GHz}$	1 MHz	$\leq 500 \text{ kHz}$	Peak, Average	Peak, Average

Table 12: Bandwidth and detector type for final radiated emissions test above 1 GHz

Prescans are performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The horn antenna is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and to be moved in a scan height range between 1 m and the scan height upper range defined in clause 6.6.3.3 of ANSI C63.10. When the EUT is manipulated through three different orientations, the scan height upper range for the measurement antenna is limited to 2.5 m above the ground plane.or 0.5 m above the top of the EUT, whichever is higher. Otherwise, the scan height upper range is 4 m above the ground plane.

To keep the emission signal within the illumination area of the 3 dB beamwidth of the measurement antenna, the automatic tilt function of the antenna support device is used to point the antenna at an angle toward the source of the emission.

The final radiated emissions test above 1 GHz is performed in the following steps:

### 5.5.2.1 Automatic measurement method

- The measurement antenna is oriented initially for vertical polarization.
- The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 12).
- The table position is set to 0°.
- The antenna height is set to 1 m.
- The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
- The antenna height is increased to the scan height upper range in steps of 50 cm. At each height, step f) is repeated.
- The polarization of the measurement antenna is changed to horizontal.
- The antenna height is decreased from the scan height upper range to 1 m in steps of 50 cm. At each height, step f) is repeated.
- The EUT is rotated in a horizontal plane through 360° in steps of 20°. At each table position, steps e) to i) are repeated.
- After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- The antenna is moved from 1 m to 4 m around this height and the EUT is rotated through 360° around while measuring the emission level continuously.
- The worst-case positions of antenna and table and the maximum emission level are recorded.
- Steps l) to n) are repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

### 5.5.2.2 Manual measurement method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 12).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded while the EUT is rotated in a horizontal plane through 360° continuously. The measurement is performed with peak detector and max hold.
- g) The antenna height is increased to the scan height upper range in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from the scan height upper range to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) After the last prescan, the significant maximum emissions with their polarizations are determined and collected in a list.
- k) For the final scan the test receiver is set to the first frequency of the list. By using the bargraph max hold function of the measurement receiver the emission in consideration is maximised by rotating the EUT in the horizontal plane through 360° and moving the antenna from 1 m to 4 m (2.5 m).
- l) The worst-case positions of antenna and table and the maximum emission level are recorded.
- m) Steps k) to l) are repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to m) are repeated in two other orthogonal positions.

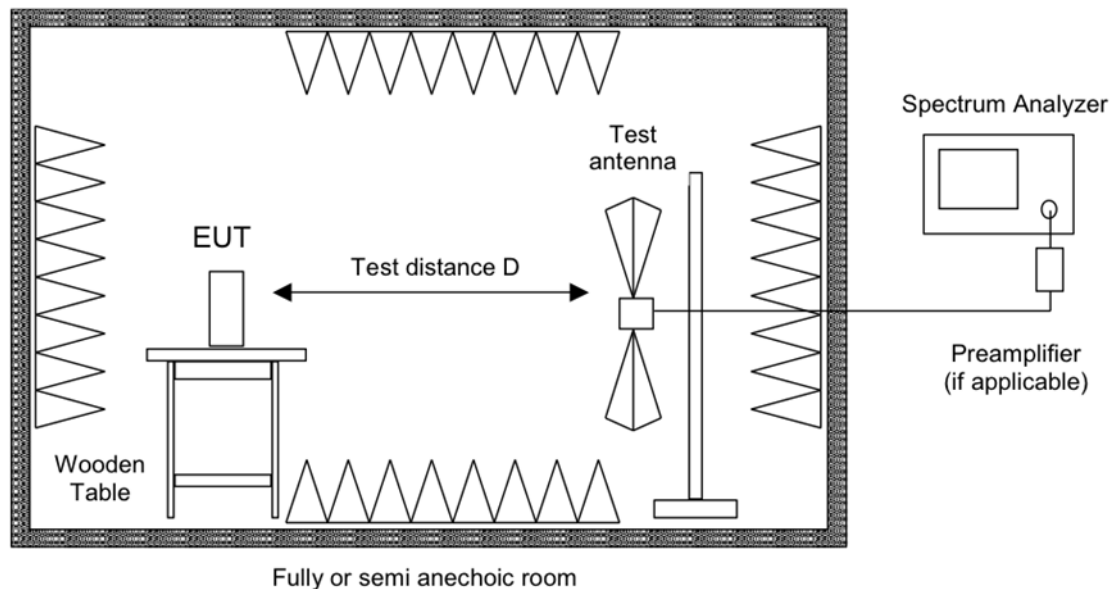


Figure 4: Setup for radiated emissions test above 1 GHz

## **5.6 Bandwidth measurements**

### **5.6.1 99 % occupied bandwidth**

According to section 6.7 of RSS-Gen, the occupied bandwidth (OBW) is defined as the 99 % emission bandwidth.

The span of the spectrum analyzer is set large enough to capture all products of the modulation process, including the emission skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.

The resolution bandwidth is in the range of 1 % to 5 % of the occupied bandwidth and the video bandwidth is not smaller than three times the resolution bandwidth. Video averaging is not permitted.

If possible, the detector of the spectrum analyzer is set to "Sample". However, if the device is not transmitting continuously, a peak, or peak hold is used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement).

To measure the 99 % emission bandwidth, the OBW function of the test receiver is used with the power bandwidth set to 99 %. This function indicates the lowest frequency (starting from the left side of the span) and the highest frequency (starting from the right side of the span) where 0.5% of the total sum is reached. The difference between the two frequencies is the 99 % occupied bandwidth.

---

## 6 Test results

This clause gives details about the test results as collected in the summary of test results on page 5.

For information about measurement uncertainties see page 41.

The climatic conditions are recorded during the tests. It is ensured that the climatic conditions are within the following ranges:

Ambient temperature	Ambient humidity	Ambient pressure
15°C to 35°C	30 % to 75 %	86 kPa to 106 kPa

## 6.1 AC power line conducted emissions 150 kHz to 30 MHz

Section(s) in 47 CFR Part 15: Requirement(s): 15.207(a)  
Reference(s): ANSI C63.10, clause 6.2

Section(s) in RSS: Requirement(s): RSS-Gen, section 8.8  
Reference(s): ANSI C63.10, clause 6.2

Performed by: Patricio Montenegro, M.Sc.-Ing. Date of test: August 8, 2024

Result: ☒ Test passed ☐ Test not passed

### 6.1.1 Test equipment

Description	Designation	Manufacturer	Inventory number(s)	Last check	Next check	Check type
Shielded room	P92007	S+M Components	E00107	---	---	N/A
EMI test receiver	ESR7	Rohde & Schwarz	E00739	2024-03-08	2025-03-08	C
Attenuator (10 dB)	HFP 50	Trilithic	E00355	2024-06-18	2025-12-18	V
Artificial mains network (AMN) with artificial hand connection	ENV432	Rohde & Schwarz	E01733	2023-11-14	2024-11-14	C
Cable set no. 1 for shielded room	RG 223/U	Huber & Suhner	E00741	2024-06-18	2025-12-18	V
	RG 223/U	Huber & Suhner	E00804	2024-06-18	2025-12-18	V

#### Note(s)

1. C = Calibration
2. V = Verification

## 6.1.2 Limits

According to §15.207(a):

Except as shown in paragraphs (b) and (c) of this section, for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30 MHz, shall not exceed the limits in the following table, as measured using a 50  $\mu$ H / 50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

According to §15.207(c):

Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

According to RSS-Gen, section 8.8:

Unless stated otherwise in the applicable RSS, for radio apparatus that are designed to be connected to the public utility AC power network, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the range 150 kHz to 30 MHz shall not exceed the limits in of the following table, as measured using a 50  $\mu$ H / 50  $\Omega$  line impedance stabilization network. This requirement applies for the radio frequency voltage measured between each power line and the ground terminal of each AC power-line mains cable of the EUT.

For an EUT that connects to the AC power lines indirectly, through another device, the requirement for compliance with the limits in the following table shall apply at the terminals of the AC power-line mains cable of a representative support device, while it provides power to the EUT. The lower limit applies at the boundary between the frequency ranges. The device used to power the EUT shall be representative of typical applications.

<i>Frequency of emission</i> (MHz)	<i>Conducted limit (dB<math>\mu</math>V)</i>	
	<i>Quasi-peak</i>	<i>Average</i>
0.15-0.5	66.0 to 56.0*	56.0 to 46.0*
0.5-5	56.0	46.0
5-30	60.0	50.0

Table 13: Limits for AC powerline conducted emissions according to § 15.207(a) and RSS-Gen, section 8.8

\*Decreases with the logarithm of the frequency



### 6.1.3 Test procedure

AC power line conducted emissions are measured using the test procedure as described in clause 5.2.

### 6.1.4 Test results

Note(s):

1. The test was performed at 120 V and 60 Hz.
2. Apart from the documented emissions, all other emissions were greater than 20 dB below the limit

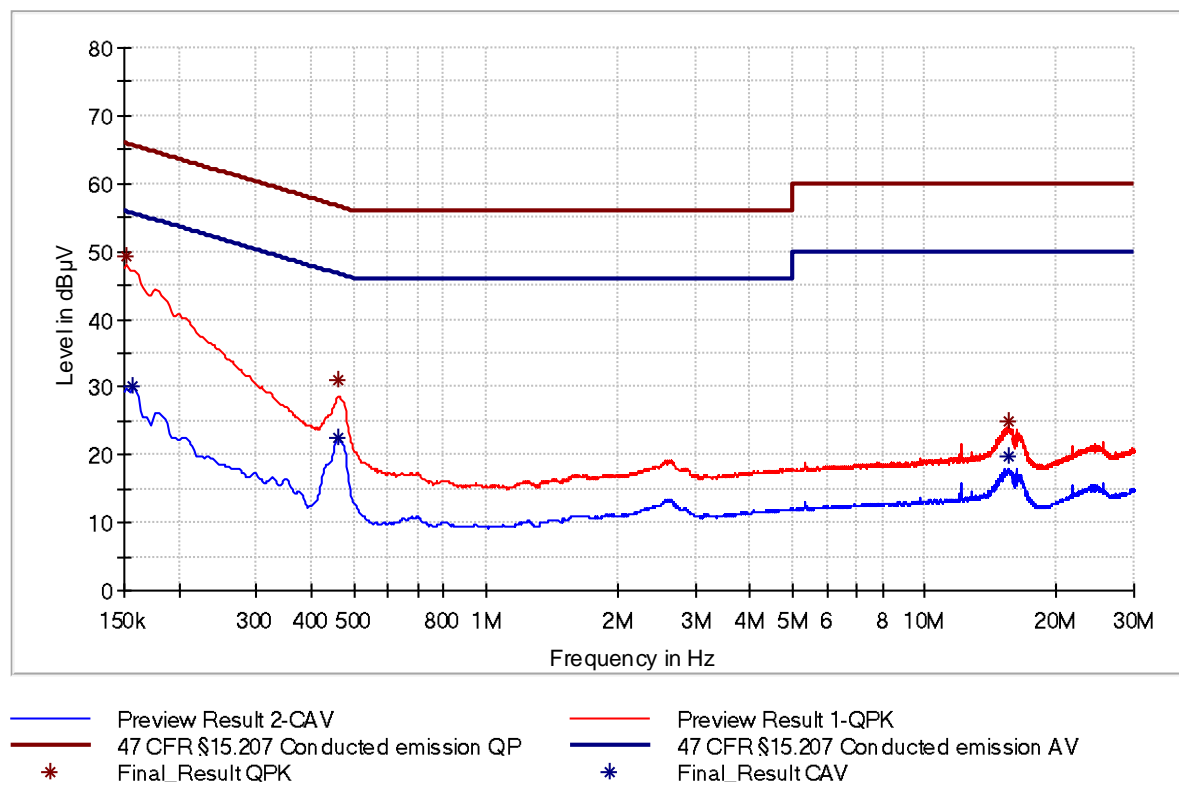


Figure 5: Chart of AC powerline conducted emissions on L1

Frequency (MHz)	QuasiPeak (dBμV)	Average (dBμV)	Limit (dBμV)	Margin (dB)	Line	PE	Corr. (dB)	Result
0.152	49.3	-	65.9	16.6	L1	GND	20.3	Passed
0.157	-	30.0	55.6	25.6	L1	GND	20.3	Passed
0.461	-	22.5	46.7	24.2	L1	GND	20.3	Passed
0.461	31.0	-	56.7	25.7	L1	GND	20.3	Passed
15.470	25.1	-	60.0	34.9	L1	GND	21.0	Passed
15.560	-	19.9	50.0	30.1	L1	GND	21.0	Passed

Table 14: Results of AC powerline conducted emissions on L1

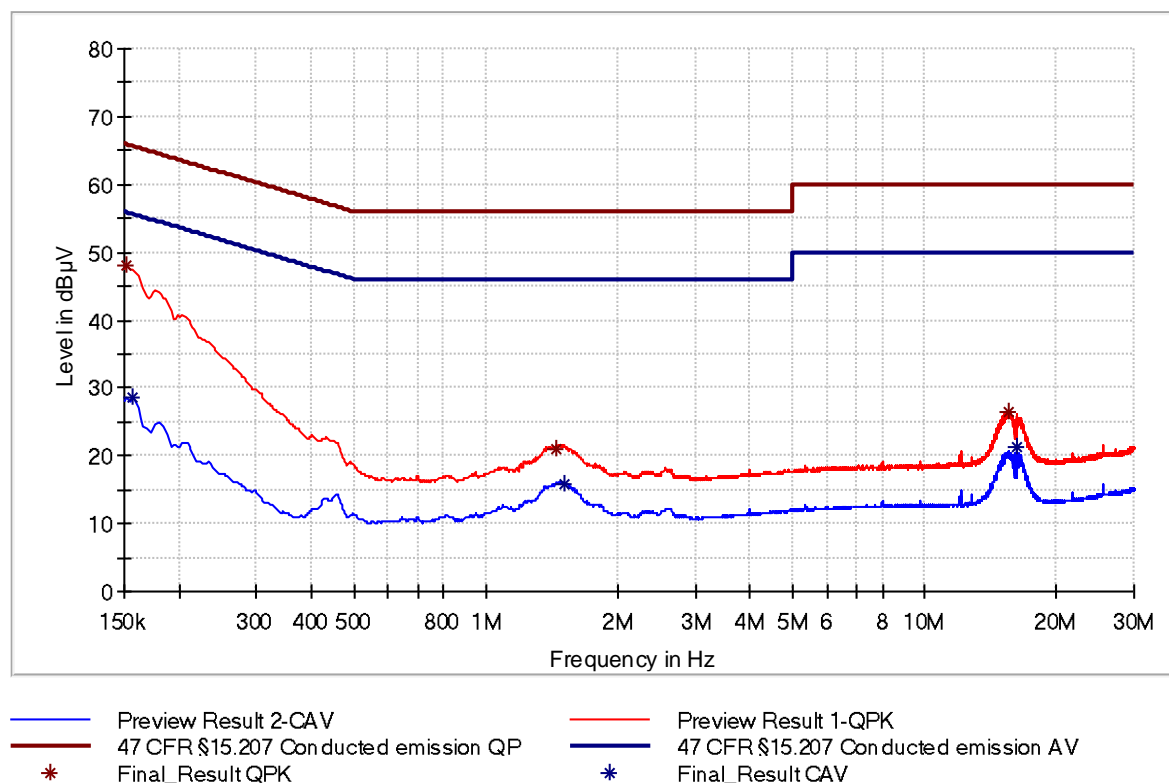


Figure 6: Chart of AC powerline conducted emissions on N

Frequency (MHz)	QuasiPeak (dBμV)	Average (dBμV)	Limit (dBμV)	Margin (dB)	Line	PE	Corr. (dB)	Result
0.152	48.1	-	65.9	17.8	N	GND	20.3	Passed
0.157	-	28.6	55.6	27.0	N	GND	20.3	Passed
1.453	20.9	-	56.0	35.1	N	GND	20.3	Passed
1.505	-	15.9	46.0	30.1	N	GND	20.3	Passed
15.558	26.5	-	60.0	33.5	N	GND	21.2	Passed
16.215	-	21.3	50.0	28.7	N	GND	21.2	Passed

Table 15: Results of AC powerline conducted emissions on N

## 6.2 Occupied bandwidth

Section(s) in RSS:

Requirement(s):  
Reference(s):RSS-Gen, section 6.7  
ANSI C63.10, clause 6.9

Performed by:	Patricio Montenegro, M.Sc.-Ing.	Date of test:	August 8, 2024
---------------	------------------------------------	---------------	----------------

Result:	<input checked="" type="checkbox"/> Result recorded	<input type="checkbox"/> Result not recorded
---------	---	--

### 6.2.1 Test equipment

Description	Designation	Manufacturer	Inventory number	Last check	Next check	Check type
EMI test receiver	ESR7	Rohde & Schwarz	E00739	2024-03-08	2025-03-08	C
RF field probe set	---	---	E00270	See note 1		N/A

Note(s)

1. Only used for relative measurements.
2. C = Calibration

### 6.2.2 Limits

According to RSS-Gen, section 6.7:

There is no limit specified, the occupied bandwidth has to be recorded and reported.

### 6.2.3 Test procedure

Occupied bandwidth is measured using the

- ☐ radiated measurement procedure with the analyzer settings as described in clause 5.6.1.
- ☒ conducted measurement procedure using a test fixture with the analyzer settings as described in clause 5.6.1.

## 6.2.4 Test results

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.

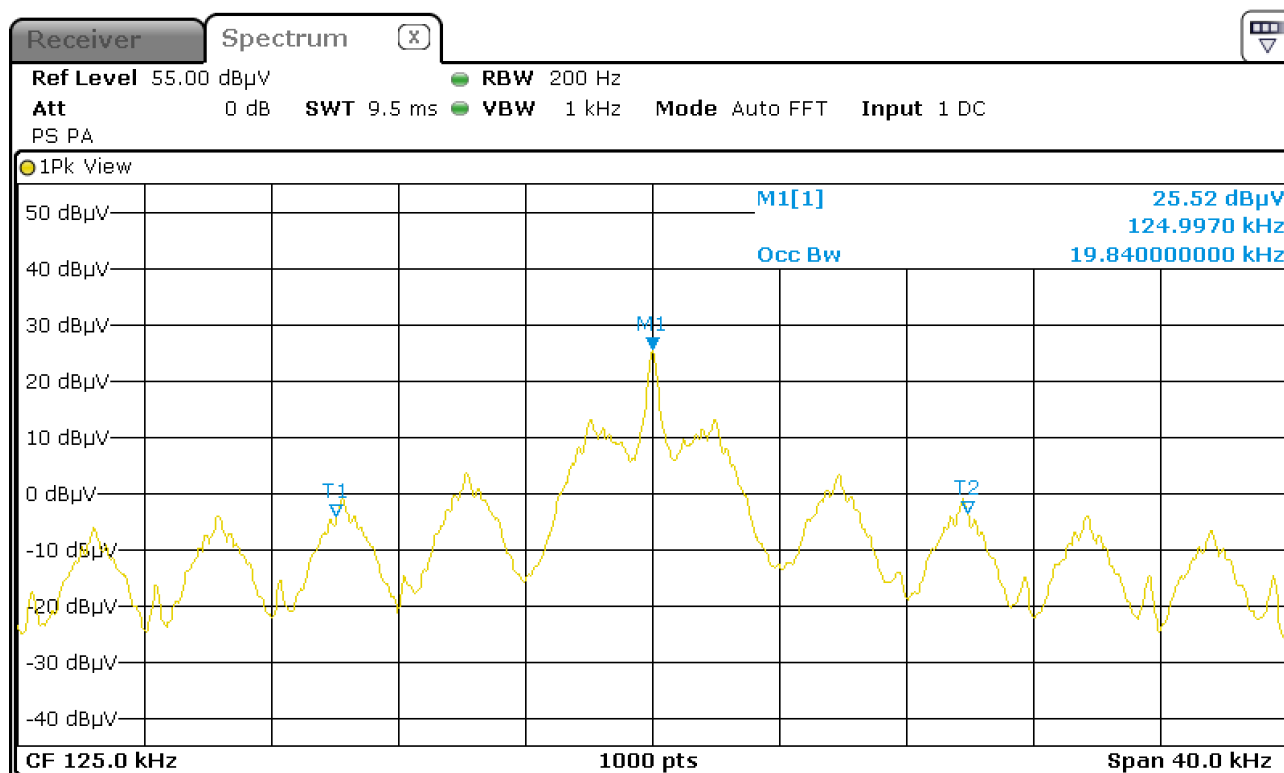


Figure 7: Chart of occupied bandwidth test, with tag

Occupied bandwidth (kHz)	Lower frequency (kHz)	Higher frequency (kHz)	Result
19.84	115.06	134.90	Recorded

Table 16: Results of occupied bandwidth test, with tag

### 6.3 Radiated emissions below 30 MHz

Section(s) in 47 CFR Part 15:	Requirement(s): Reference(s):	15.209(a) ANSI C63.10, clause 6.4
Section(s) in RSS:	Requirement(s): Reference(s):	RSS-210, section 7.3 ANSI C63.10, clause 6.4

Performed by:	Patricio Montenegro, M.Sc.-Ing.	Date of test:	August 5, 2024
---------------	------------------------------------	---------------	----------------

Result: ☒ Test passed ☐ Test not passed

#### 6.3.1 Test equipment

Description	Designation	Manufacturer	Inventory number	Last check	Next check	Check type
Compact diagnostic chamber (CDC)	VK041.0174	Albatross Projects	E00026	2021-10-21	2024-10-21	V
EMI test receiver	ESR7	Rohde & Schwarz	E00739	2024-03-08	2025-03-08	C
Loop antenna	HFH2-Z2	Rohde & Schwarz	E00060	2023-11-07	2024-11-07	C
Cable set CDC	RG214 Hiflex - 500cm	AME HF-Technik	E01474	2024-08-06	2026-02-06	V
	LCF12-50J-N-N-7300	stabo Elektronik	E01215	2024-08-06	2026-02-06	V
	LMR400 - 350cm	AME HF-Technik	E00920	2024-08-06	2026-02-06	V
	S04272B - 200cm	AME HF-Technik	E01284	2024-08-06	2026-02-06	V

Note(s)

1. Only used for relative measurements.
2. C = Calibration
3. V = Verification

### 6.3.2 Limits

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{V/m}$ )	( $\text{dB}\mu\text{V/m}$ )	
0.009 – 0.490	2400/F(kHz) (266.67 – 4.90)	48.5 – 13.8	300
0.490 – 1.705	24000/F(kHz) (48.98 – 14.08)	33.8 – 23.0	30
1.705 – 30	30	29.5	30

Table 17: General radiated emission limits up to 30 MHz according to §15.209

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{A/m}$ )	( $\text{dB}\mu\text{A/m}$ )	
0.009 – 0.490	6.37/F(kHz) (0.708 – 0.013)	-3.0 – -37.7	300
0.490 – 1.705	63.7/F(kHz) (0.130 – 0.037)	-17.7 – -28.6	30
1.705 – 30	0.08	-21.9	30

Table 18: General radiated emission limits up to 30 MHz according to section 8.9 of RSS Gen

In case of measurements that are performed at other distances than that specified in the requirements, the limits in the charts and tables reported with the test results are derived from the general radiated emission limits as listed in table 17 and Table 18, using the recalculation factor as described in clause 5.3.

### 6.3.3 Test procedure

The radiated emissions below 30 MHz are measured using the

- ☒ manual measurement procedure as described in clause 5.3.
- ☐ automatic measurement procedure as described in clause 5.3.

### 6.3.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m		
Antenna alignment:	<input checked="" type="checkbox"/> in parallel (O)	<input checked="" type="checkbox"/> in line (I)	
EUT position:	<input type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.
2. No assessable emissions could be detected.
3. The limits in CFR 47, Part 15, Subpart C, paragraph 15.209(a), are identical to those in RSS-Gen section 8.9, Table 6, since the measurements are performed in terms of magnetic field strength and converted to electric field strength levels (as reported in the table) using the free space impedance of 377 Ohms. For example, the measurement at frequency X kHz resulted in a level of Y dBuV/m, which is equivalent to  $Y - 51.5 = Z$  dBuA/m, which has the same margin, W dB, to the corresponding RSS-Gen limit as it has to 15.209(a) limit.

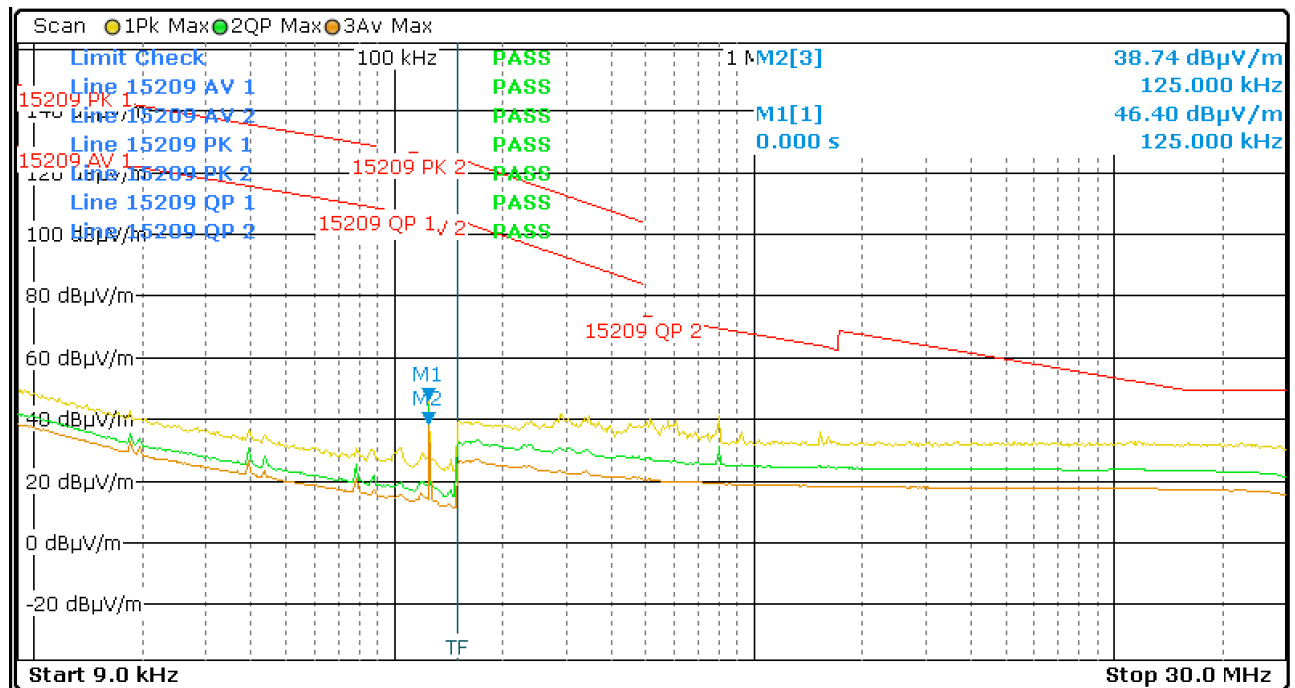


Figure 8: Chart of radiated emissions test below 30 MHz, EUT position Y, antenna polarization parallel, without tag

<i>Freq.</i> (MHz)	<i>EUT</i> <i>Pos.</i>	<i>Det</i>	<i>FS</i> <i>at 3 m</i>	<i>Rec.</i> <i>Factor</i> (dB)	<i>Calc.</i> <i>field</i> <i>strength</i> (dB $\mu$ V/ m)	<i>at</i> <i>dist.</i> (m)	<i>Limit</i> (dB $\mu$ V/ m)	<i>at</i> <i>dist.</i> (m)	<i>Mar.</i> (dB)	<i>Pol</i>	<i>Azim.</i> (deg)	<i>Corr.</i> (dB/m)	<i>Res</i>
0.125	Y	Pk	46.2	-80.0	-33.8	300	45.7	300	79.5	O	196	19.6	P
0.125	Y	AV	39.5	-80.0	-40.5	300	25.7	300	66.2	O	196	19.6	P

Table 19: Final results of radiated emissions test below 30 MHz according to § 15.209, without tag

with:

- Freq.* = Frequency
- EUT Pos.* = EUT Position
- Det* = Detector
- FS at 3 m* = Field strength (dB $\mu$ V/m at 3 m)
- Rec. factor* = Recalculation factor
- Calc.* = Calculated
- at dis* = at distance
- Mar.* = Margin
- Pol.* = Polarization of the measurement antenna
- I* = Polarization of the measurement antenna in line
- O* = Polarization of the measurement antenna parallel
- Azim. (deg)* = Azimuth (degree)
- Corr.* = Correction factor
- Res.* = Result
- P* = Passed
- Np* = Not passed

<i>Freq.</i> (MHz)	<i>EUT</i> <i>Pos.</i>	<i>Det.</i>	<i>Calc.</i> <i>field</i> <i>strength</i> (dB $\mu$ A/m at 3 m)	<i>Rec.</i> <i>Factor</i> (dB)	<i>Calc.</i> <i>field</i> <i>strength</i> (dB $\mu$ A/ m)	<i>at</i> <i>dist.</i> (m)	<i>Limit</i> (dB $\mu$ A/ m)	<i>at</i> <i>dist.</i> (m)	<i>Mar.</i> (dB)	<i>Pol</i>	<i>Azim.</i> (deg)	<i>Corr.</i> (dB/m)	<i>Res</i>
0.125	Y	Pk	-5.3	-80.0	-85.3	300	-5.8	300	79.5	O	196	-31.9	P
0.125	Y	AV	-12.0	-80.0	-92.0	300	-25.8	300	66.2	O	196	-31.9	P

Table 20: Final results of radiated emissions test below 30 MHz according to RSS-210, without tag

Note:

- The calculated field strength (dB $\mu$ A/m at 3 m) is the measured field strength (dB $\mu$ V/m at 3 m) minus 51.5 dB.

with:

- Freq.* = Frequency
- EUT Pos.* = EUT Position
- Det.* = Detector
- Rec. factor* = Recalculation factor
- Calc.* = Calculated
- at dis* = at distance
- Mar.* = Margin
- Pol.* = Polarization of the measurement antenna
- I* = Polarization of the measurement antenna in line
- O* = Polarization of the measurement antenna parallel
- Azim. (deg)* = Azimuth (degree)
- Corr.* = Correction factor
- Res.* = Result
- P* = Passed
- Np* = Not passed



## 6.4 Radiated emissions from 30 MHz to 1 GHz

Section(s) in 47 CFR Part 15:	Requirement(s): Reference(s):	15.209(a) ANSI C63.10, clause 6.5
Section(s) in RSS:	Requirement(s): Reference(s):	RSS-210, section 7.3 ANSI C63.10, clause 6.5

Performed by:	Patricio Montenegro, M.Sc.-Ing.	Date of test:	July 2, 2024
---------------	------------------------------------	---------------	--------------

Result: ☒ Test passed ☐ Test not passed

### 6.4.1 Test equipment

Description	Designation	Manufacturer	Inventory number	Last check	Next check	Check type
Semi-anechoic chamber (SAC)	SAC3	Albatross Projects	E00716	2023-01-03	2026-01-03	V
EMI test receiver	ESW44	Rohde & Schwarz	E00895	2023-11-23	2024-11-23	C
TRILOG broadband antenna	VULB 9162	Schwarzbeck Mess-Elektronik	E00643	2024-04-17	2027-04-17	C
Cable set anechoic chamber	262-0942-1500	Teledyne Storm Microwave	E00435	2024-02-19	2025-08-19	V
	SF104EA/11PC35/11PC35/5000MM	Huber & Suhner	E01032	2023-08-29	2025-02-28	V
	262-0942-1500	Teledyne Storm Microwave	E00433	2024-02-19	2025-08-19	V
Cable set no. 1 for semi-anechoic chamber SAC3	SF104E/11PC35/11PC35/2000MM	Huber & Suhner	E01034	2023-01-03	2024-07-03	V
	SF104E/11PC35/11PC35/2000MM	Huber & Suhner	E01435	2023-01-03	2024-07-03	V
	SF104EA/11PC35/11PC35/1000MM	Huber & Suhner	E01439	2024-05-06	2025-11-06	V

Note(s)

1. C = Calibration
2. V = Verification

### 6.4.2 Limits

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

<i>Frequency (MHz)</i>	<i>Field strength</i>		<i>Measurement distance (m)</i>
	<i>(<math>\mu</math>V/m)</i>	<i>(dB<math>\mu</math>V/m)</i>	
30 – 88	100	40.0	3
88 – 216	150	43.5	3
216 - 960	200	46.0	3
Above 960	500	54.0	3

Table 21: General radiated emission limits  $\geq$  30 MHz according to §15.209 and RSS-Gen

### 6.4.3 Test procedure

The radiated emissions from 30 MHz to 1 GHz are measured using the

- ☒ manual measurement procedure as described in clause 5.4.2
- ☐ automatic measurement procedure as described in clause 5.4.1

## 6.4.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m	<input type="checkbox"/> ..... m	
Polarization:	<input checked="" type="checkbox"/> horizontal	<input checked="" type="checkbox"/> vertical	
EUT position:	<input type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.

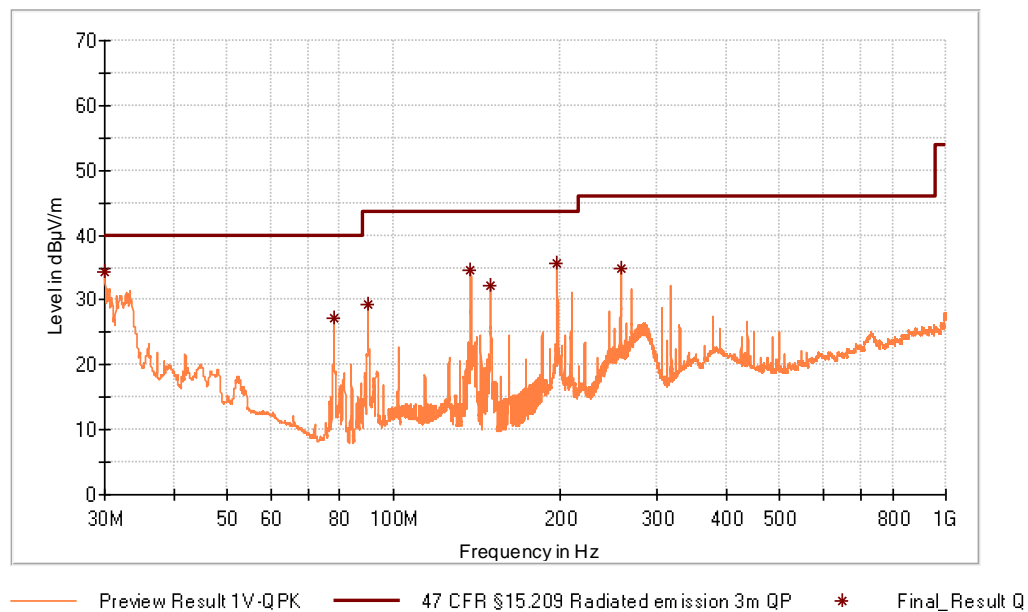


Figure 9: Chart of radiated emissions test from 30 MHz to 1 GHz, EUT position Y, with tag, antenna vertical

<i>Freq.</i> (MHz)	<i>EUT</i> <i>Pos.</i>	<i>Det.</i>	<i>Field</i> <i>strength</i> (dB $\mu$ V/m at 3 m)	<i>Limit</i> (dB $\mu$ V/m at 3 m)	<i>Margin</i> (dB)	<i>Height</i> (cm)	<i>Pol.</i>	<i>Azim.</i> (deg)	<i>Corr.</i> (dB/m)	<i>Result</i>
30.00	Y	QP	34.3	40.0	5.7	100.0	V	229.0	10.9	Passed
78.00	Y	QP	27.1	40.0	12.9	196.0	V	26.0	7.9	Passed
90.00	Y	QP	29.4	43.5	14.1	113.0	V	60.0	10.7	Passed
138.00	Y	QP	34.7	43.5	8.8	100.0	V	120.0	9.3	Passed
150.00	Y	QP	32.2	43.5	11.3	100.0	V	266.0	9.3	Passed
198.00	Y	QP	35.6	43.5	7.9	100.0	V	76.0	13.3	Passed
258.00	Y	QP	34.8	46.0	11.2	146.0	V	180.0	14.5	Passed

Table 22: Results of radiated emissions test from 30 MHz to 1 GHz, with tag

with: *Freq.* = Frequency  
*EUT Pos.* = EUT Position  
*Det.* = Detector  
*Pol.* = Polarization of the measurement antenna  
*Azim. (deg)* = Azimuth (degree)  
*Corr.* = Correction factor

## 6.5 Radiated emissions > 1 GHz

Section(s) in 47 CFR Part 15:	Requirement(s): Reference(s):	15.209(a) ANSI C63.10, clause 6.6
Section(s) in RSS:	Requirement(s): Reference(s):	RSS-210, section 7.3 ANSI C63.10, clause 6.6

Performed by:	Patricio Montenegro, M.Sc.-Ing.	Date of test:	July 2, 2024
---------------	------------------------------------	---------------	--------------

Result: ☒ Test passed ☐ Test not passed

### 6.5.1 Test equipment

Description	Designation	Manufacturer	Inventory number	Last check	Next check	Check type
Semi-anechoic chamber (SAC)	SAC3	Albatross Projects	E00716	2023-01-03	2026-01-03	V
EMI test receiver	ESW44	Rohde & Schwarz	E00895	2023-11-23	2024-11-23	C
Preamplifier (1 GHz to 18 GHz)	ALS05749	Aldetec	W01007	2024-06-17	2025-06-17	V
Double ridged broadband horn antenna	BBHA 9120D	Schwarzbeck Mess-Elektronik	W00053	2022-09-27	2025-09-27	C
Cable set no. 1 for semi-anechoic chamber SAC3	SF104E/11PC35/11PC35/2000 MM	Huber & Suhner	E01034	2023-01-03	2024-07-03	V
	SF104E/11PC35/11PC35/2000 MM	Huber & Suhner	E01435	2023-01-03	2024-07-03	V
	SF104EA/11PC35/11PC35/1000MM	Huber & Suhner	E01439	2024-05-06	2025-11-06	V

Note(s)

1. C = Calibration
2. V = Verification

## 6.5.2 Limits

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

<i>Frequency (MHz)</i>	<i>Field strength</i>		<i>Measurement distance (m)</i>
	<i>(<math>\mu</math>V/m)</i>	<i>(dB<math>\mu</math>V/m)</i>	
Above 960	500	54.0	3

Table 23: General radiated emission limits above 960 MHz according to §15.209 and RSS-Gen

## 6.5.3 Test procedure

The radiated emissions above 1 GHz are measured using the

- ☒ manual measurement procedure as described in clause 5.5.
- ☐ automatic measurement procedure as described in clause 5.5.

## 6.5.4 Test results

Test distance:	Exploratory tests:	<input type="checkbox"/> 1 m	<input type="checkbox"/> 0.5 m
	Final tests:	<input checked="" type="checkbox"/> 3 m	<input type="checkbox"/> 1.5 m
Polarization:	<input checked="" type="checkbox"/> horizontal	<input checked="" type="checkbox"/> vertical	
EUT position:	<input type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input type="checkbox"/> Position Z

Note(s):

- 1 Pre-measurements were performed to declare the worst case which is documented below. The table results show the final measurements of the emissions detected in the pre-measurements which are shown in this test report.
- 2 According to clause 6.6.4.3, note 1 of ANSI C63.10, if the maximized peak measured value complies with the average limit, than it is unnecessary to perform an average measurement.

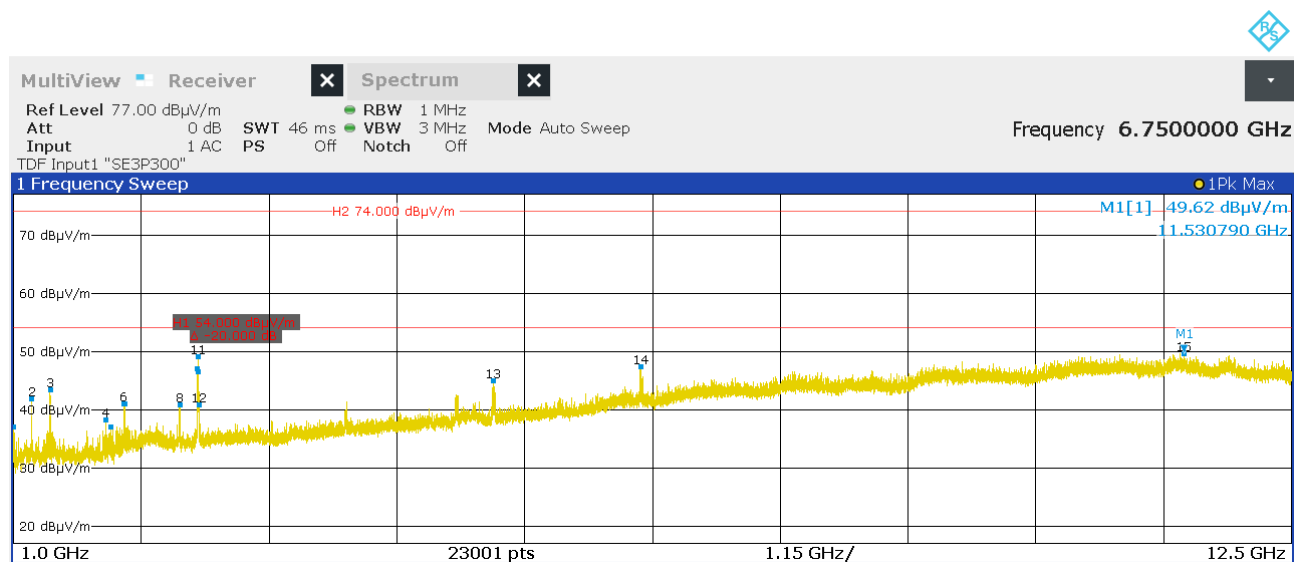


Figure 10: Chart of radiated emissions pre-measurement from 1 GHz to 12.5 GHz, EUT position Y, without tag, antenna polarization vertical

<i>Freq.</i> (MHz)	<i>EU</i> <i>T</i> <i>Pos.</i>	<i>Det.</i>	<i>Level</i> (dB $\mu$ V/m) at 3 m	<i>Peak</i> <i>limit</i> (dB $\mu$ V/m) at 3 m	<i>Mar.</i> (dB)	<i>Average</i> <i>limit</i> (dB $\mu$ V/m) at 3 m	<i>Mar.</i> (dB)	<i>Height</i> (cm)	<i>Pol.</i>	<i>Azim.</i> (deg)	<i>Corr.</i> (dB/m)	<i>Res.</i>
1001.750	Y	Pk	40.1	74.0	33.9	54.0	13.9	153	V	172	-19.9	P
1164.740	Y	Pk	47.5	74.0	26.5	54.0	6.5	156	V	194	-19.0	P
1329.740	Y	Pk	42.6	74.0	31.4	54.0	11.4	150	V	212	-18.7	P
1829.710	Y	PK	44.6	74.0	29.4	54.0	9.4	150	V	104	-18.0	P
1993.710	Y	Pk	46.5	74.0	27.5	54.0	7.5	194	V	127	-16.9	P
2497.180	Y	Pk	43.1	74.0	30.9	54.0	10.9	218	V	159	-14.9	P
2662.180	Y	Pk	51.0	74.0	23.0	54.0	3.0	150	V	204	-14.3	P
5316.060	Y	Pk	47.4	74.0	26.6	54.0	6.6	150	V	360	-6.9	P
6650.500	Y	Pk	51.1	74.0	22.9	54.0	2.9	150	V	62	-3.2	P

Table 24: Results of radiated emissions test &gt; 1 GHz, without tag

with:

- Freq.* = Frequency
- EUT Pos.* = EUT Position
- Det.* = Detector
- Mar.* = Margin
- Pol.* = Polarization of the measurement antenna
- Azim. (deg)* = Azimuth (degree)
- Corr.* = Correction factor
- Res.* = Result
- P* = Passed
- Np* = Not passed



## 7 Measurement uncertainties

Description	Uncertainty	$U_{Limit}$	Note(s)	k=
AC power line conducted emission	$\pm 3.0$ dB	$\pm 3.4$ dB	2b), 3b)	2
Bandwidth tests	$\pm 2.0$ %	$\pm 5$ %	2a), 3a)	2
Radiated emissions				
from 9 kHz to 30 MHz	$\pm 3.8$ dB	$\pm 4.0$ dB	2b), 3b)	2
from 30 MHz to 1 GHz	$\pm 6.1$ dB	$\pm 6.3$ dB	2b), 3b)	2
from 1 GHz to 6 GHz	$\pm 4.6$ dB	$\pm 5.2$ dB	2b), 3b)	2
from 6 GHz to 18 GHz	$\pm 5.0$ dB	$\pm 5.5$ dB	2b), 3b)	2
from 18 GHz to 26.5 GHz	$\pm 5.4$ dB	$\pm 6.0$ dB	2b), 3c)	2
from 26.5 GHz to 40 GHz	$\pm 6.2$ dB	$\pm 6.5$ dB	2b), 3c)	2

### Note(s):

- The uncertainty stated is the expanded uncertainty obtained by multiplying the standard uncertainty by the coverage factor k. For a confidence level of 95 % the coverage factor k is 2.
- The values of the measurement uncertainty as listed above are calculated according to
  - ETSI TR 100 028-1 V1.4.1 and ETSI TR 100 028-2 V1.4.1
  - CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
- The limits for the measurement uncertainty as listed above are
  - derived from ETSI EN 300 328 V2.1.1
  - equal to  $U_{CISPR}$  taken from CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
  - defined by the test laboratory
- Simple acceptance is applied as the decision rule while keeping the specified limits ( $U_{Limit}$ ) for the expanded measurement uncertainty (i.e. Test Uncertainty Ratio  $TUR \geq 1:1$ ). That means, compliance is based on the recorded level by the lab irrespective of the expanded measurement uncertainty value but with a limitation to it. For details on simple acceptance and the level of risk (such as false accept, false reject and false statistical assumptions) associated with this decision rule see ISO/IEC Guide 98-4:2012 and ILAC G8:09/2019 "Guidelines on Decision Rules and Statements of Conformity" ("Binary Statement for Simple Acceptance Rule" according to clause 4.2.1).
- All used test instruments as well as the test accessories are calibrated at regular intervals.

## 8 Revision history

<i>Revision</i>	<i>Date</i>	<i>Issued by</i>	<i>Description of modifications</i>
0	2024-08-14	Patricio Montenegro, M.Sc.-Ing.	First edition

Template: RF\_15.209\_RSS-210\_V1.10