



FCC / IC Test Report

FOR:

Xirgo Technologies, LLC

Model Name:

XT4964

Product Description:

Sends reports of location and various sensor information periodically via the cellular network

FCC ID: GKM-XT4964

IC ID: 10281A-XT4964

Applied Rules and Standards:

47 CFR Part 15.247 (DTS)

RSS-247 Issue 2 (DTS) & RSS-Gen Issue 5

REPORT #: EMC_XIRGO-128-19001_15.247_BTLE_DTS

DATE: 2019-11-21



A2LA Accredited

IC recognized #
3462B-2

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CETECOM Inc. is a Delaware Corporation with Corporation number: 2905571

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1 Assessment

The following device was evaluated against the applicable criteria specified in FCC rules Parts 15.247 of Title 47 of the Code of Federal Regulations and the relevant ISED Canada standard RSS-247.

No deviations were ascertained.

Company	Description	Model #
Xirgo Technologies, LLC	Sends reports of location and various sensor information periodically via the cellular network	XT4964

Responsible for Testing Laboratory:

2019-11-21	Compliance	Cindy Li (EMC Lab Manager)	
Date	Section	Name	Signature

Responsible for the Report:

2019-11-21	Compliance	Chin Ming Lui (Associate EMC Engineer)	
Date	Section	Name	Signature

The test results of this test report relate exclusively to the test item specified in Section 3.
CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

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2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the EMC Test Report

Company Name:	CETECOM Inc.
Department:	Compliance
Street Address:	411 Dixon Landing Road
City/Zip Code	Milpitas, CA 95035
Country	USA
Telephone:	+1 (408) 586 6200
Fax:	+1 (408) 586 6299
EMC Lab Manager:	Cindy Li
Responsible Project Leader:	Rami Saman

2.2 Identification of the Client

Client's Name:	Xirgo Technologies, LLC
Street Address:	188 Camino Ruiz
City/Zip Code	Camarillo, CA 93012
Country	USA

2.3 Identification of the Manufacturer

Manufacturer's Name:	Same as Client
Manufacturers Address:	
City/Zip Code	
Country	

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3 Equipment Under Test (EUT)

3.1 EUT Specifications

Model No:	XT4964
HW Version :	XT4964-001
SW Version :	XT4964-01
FCC-ID:	GKM-XT4964
IC-ID:	10281A-XT4964
HVIN:	XT4964
PMN:	XT4964
Product Description:	Sends reports of location and various sensor information periodically via the cellular network
Frequency Range / number of channels:	Nominal band: 2400 MHz – 2483.5 MHz; Center to center: 2402 MHz (ch 0) – 2480 MHz (ch 39), 40 channels
Type(s) of Modulation:	BTLE
Modes of Operation:	BTLE
Antenna Information as declared:	• Type: Ceramic Chip • Location: Internal • Peak Gain: 0.5 dBi • Operating Frequency: 2400 – 2483.5 MHz
Max. Peak Output Power:	Conducted Power: 11.15 dBm
Power Supply/ Rated Operating Voltage Range:	Battery / Vmin: 8 VDC/ Vnom: 12 VDC / Vmax: 24 VDC
Operating Temperature Range:	-40 °C to 70 °C
Other Radios included in the device:	❖ <u>LTE / WCDMA (UMTS) / GSM</u> • Module name: Quectel • Model number: EG25-G(D) • FCC ID: XMR201903EG25G • IC ID: 10224A-201903EG25G • Frequency Band of Operation:

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	▪ FDD LTE Band 2: 1850 – 1910 MHz ▪ FDD LTE Band 4: 1710 – 1755 MHz ▪ FDD LTE Band 5: 824 – 849 MHz ▪ FDD LTE Band 12: 699 – 716 MHz ▪ WCDMA/UMTS FDD Band II: 1852.4 – 1907.6 MHz ▪ WCDMA/UMTS FDD Band IV: 1712.4 – 1752.6 MHz ▪ WCDMA/UMTS FDD Band V: 826.4 – 846.6 MHz ▪ GSM 850: 824.2 – 848.8 MHz ▪ GSM 1900: 1850.2 – 1909.8 MHz • Main Antenna ▪ Type: PCB ▪ Location: Internal (The Antenna Company) ▪ Peak Gain: ○ LTE 2 / UMTS II / GSM 1900: 3.3 dBi ○ LTE 4 / UMTS IV: 3.1 dB ○ LTE 5 / UMTS V / GSM 850: 4.0 dBi ○ LTE 12: 2.4 dBi
Sample Revision:	☐ Prototype Unit; ☒ Production Unit; ☐ Pre-Production

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3.2 EUT Sample details

EUT #	Serial Number	HW Version	SW Version	Notes/Comments
1	861861040020011	XT4964-001	XT4964-01	Conducted Measurement
2	861861040020029	XT4964-001	XT4964-01	Radiated Measurement

3.3 Support Equipment

SE #	Type	Model	Manufacturer	Serial Number
1	DC Power Supply	GPS-3030DD	GW INSTR	EM850939
2	DC Power Supply	1672	BK PRECISION	1672002260611085

3.4 Test Sample Configuration

EUT Set-up #	Combination of SE used for test set up	Comments
1	EUT#1 + SE#1	Conducted RF measurements were performed by configuring the BTLE radio of the unit to low, mid, and high channels via customer provided special commands through command window that will not be available to the end user
2	EUT#2 + SE#2	Radiated RF measurements were performed by configuring the BTLE radio of the unit to low, mid, and high channels via customer provided special commands through command window that will not be available to the end user

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3.5 Justification for Worst Case Mode of Operation

During the testing process, the EUT was tested with transmitter sets on low, mid and high channels at maximum output power. Based on client declaration, the EUT was configured to the highest duty cycle. For radiated measurements, all data in this report shows the worst case between horizontal and vertical antenna polarizations and for all orientations of the EUT.

4 Subject of Investigation

The objective of the measurements done by CETECOM Inc. was to assess the performance of the EUT according to the relevant requirements specified in FCC rules Part 15.247 of Title 47 of the Code of Federal Regulations and Radio Standard Specification RSS-247 of ISED Canada.

Testing procedures are based on 558074 D01 15.247 Meas Guidance v05r01 – “GUIDANCE FOR COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEM, FREQUENCY HOPPING SPREAD SPECTRUM SYSTEM, AND HYBRID SYSTEM DEVICES OPERATING UNDER SECTION 15.247 OF THE FCC RULES” – February 11, 2019, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.

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5 Measurement Results Summary

Test Specification	Test Case	Temperature and Voltage Conditions	Mode	Pass	NA	NP	Result
§15.247(a)(1) RSS-247 5.2(1)	Emission Bandwidth	Nominal	BTLE	■	□	□	Complies
§15.247(e) RSS-247 5.2(2)	Power Spectral Density	Nominal	BTLE	■	□	□	Complies
§15.247(b)(1) RSS-247 5.4(4)	Maximum Conducted Output Power and EIRP	Nominal	BTLE	■	□	□	Complies
§15.247(d) RSS-247 5.5	Band edge compliance Unrestricted Band Edges	Nominal	BTLE	■	□	□	Complies
§15.247; 15.209; 15.205 RSS-Gen 8.9; 8.10	Band edge compliance Restricted Band Edges	Nominal	BTLE	■	□	□	Complies
§15.247(d); §15.209 RSS-Gen 6.13	TX Spurious emissions- Radiated	Nominal	BTLE	■	□	□	Complies
§15.207(a) RSS Gen 8.8	AC Conducted Emissions	Nominal	BTLE	□	■	□	N/A ²

Note1: NA= Not Applicable; NP= Not Performed.

Note2: EUT is powered by 12VDC battery

6 Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the apparatus, with 95% confidence interval (in dB delta to result), based on a coverage factor k=1.

Radiated measurement

9 kHz to 30 MHz	±2.5 dB (Magnetic Loop Antenna)
30 MHz to 1000 MHz	±2.0 dB (Biconilog Antenna)
1 GHz to 40 GHz	±2.3 dB (Horn Antenna)

Conducted measurement

150 kHz to 30 MHz	±0.7 dB (LISN)
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RF conducted measurement	±0.5 dB
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According to TR 102 273 a multiplicative propagation of error is assumed for RF measurement systems. For this reason the RMS method is applied to dB values and not to linear values as appropriate for additive propagation of error. Also used: <http://physics.nist.gov/cuu/Uncertainty/typeb.html>. The above calculated uncertainties apply to direct application of the Substitution method. The Substitution method is always used when the EUT comes closer than 3 dB to the limit.

6.1 Environmental Conditions During Testing:

The following environmental conditions were maintained during the course of testing:

- Ambient Temperature: 20-25° C
- Relative humidity: 40-60%

6.2 Dates of Testing:

10/23/2019 – 10/25/2019, 11/20/2019

7 Measurement Procedures

7.1 Radiated Measurement

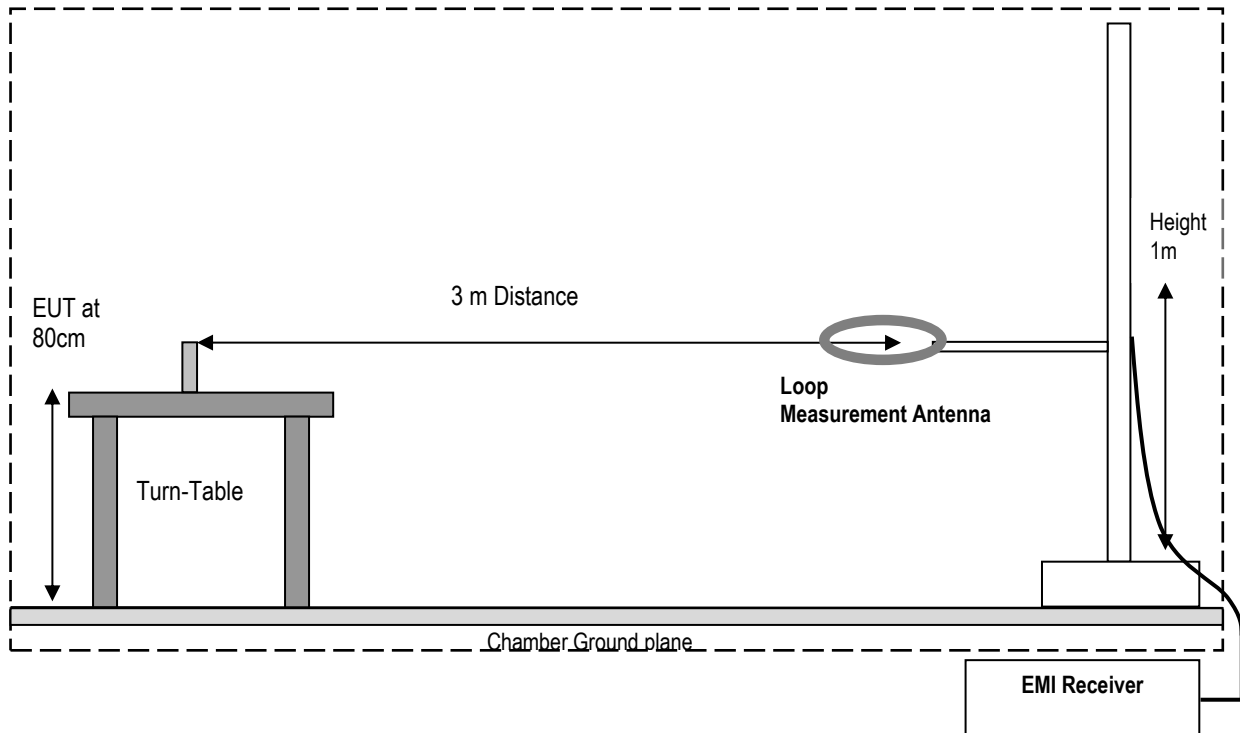
The radiated measurement is performed according to ANSI C63.10 (2013)

- The exploratory measurement is accomplished by running a matrix of 16 sweeps over the required frequency range with R&S Test-SW EMC32 for 4 positions of the turntable, two orthogonal positions of the EUT and both antenna polarizations. This procedure exceeds the requirement of the above standards to cover the 3 orthogonal axis of the EUT. A max peak detector is utilized during the exploratory measurement. The Test-SW creates an overall maximum trace for all 12 sweeps and saves the settings for each point of this trace. The maximum trace is part of the test report.
- The 10 highest emissions are selected with an automatic algorithm of EMC32 searching for peaks in the noise floor and ensuring that broadband signals are not selected multiple times.
- The maxima are then put through the final measurement and again maximized in a 90deg range of the turntable, fine search in frequency domain and height scan between 1m and 4m.
- The above procedure is repeated for all possible ways of power supply to EUT and for all supported modulations.
- In case there are no emissions above noise floor level only the maximum trace is reported as described above.
- The results are split up into up to 4 frequency ranges due to antenna bandwidth restrictions. A magnetic loop is used from 9 kHz to 30 MHz, a Biconilog antenna is used from 30 MHz to 1 GHz, and two different horn antennas are used to cover frequencies up to 40 GHz.

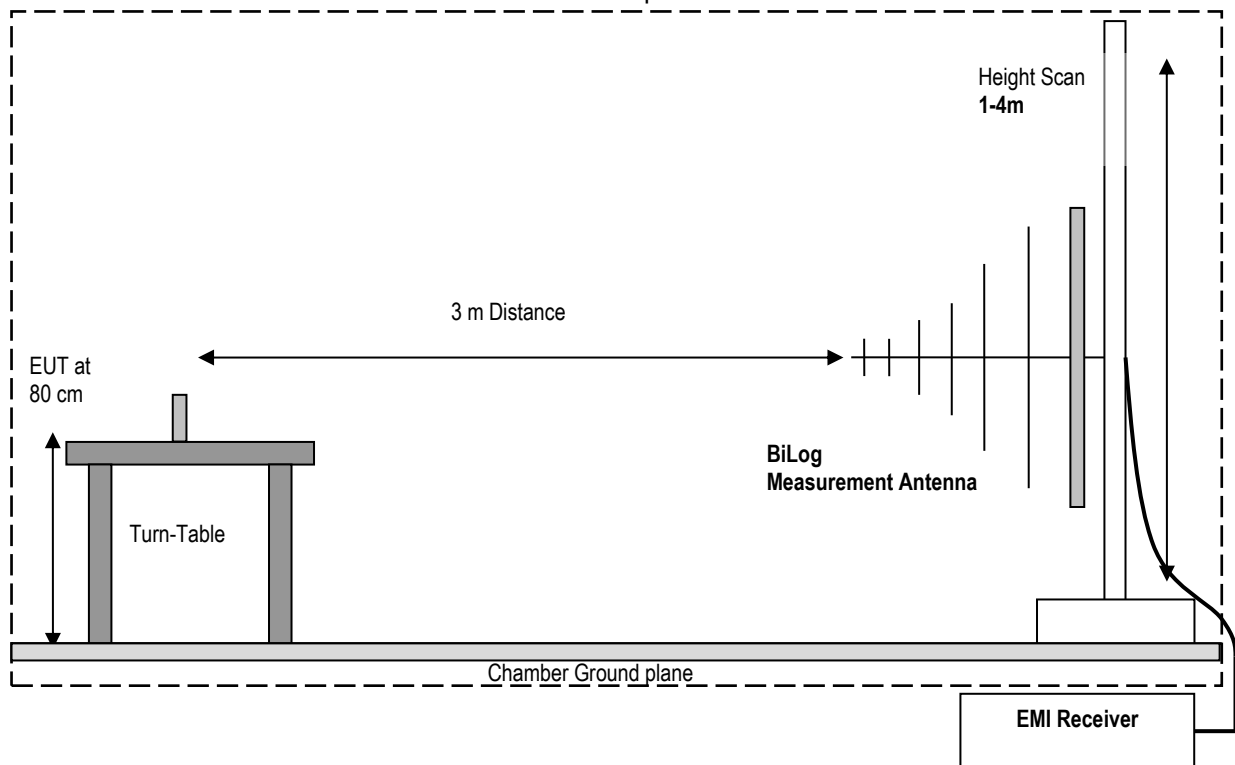
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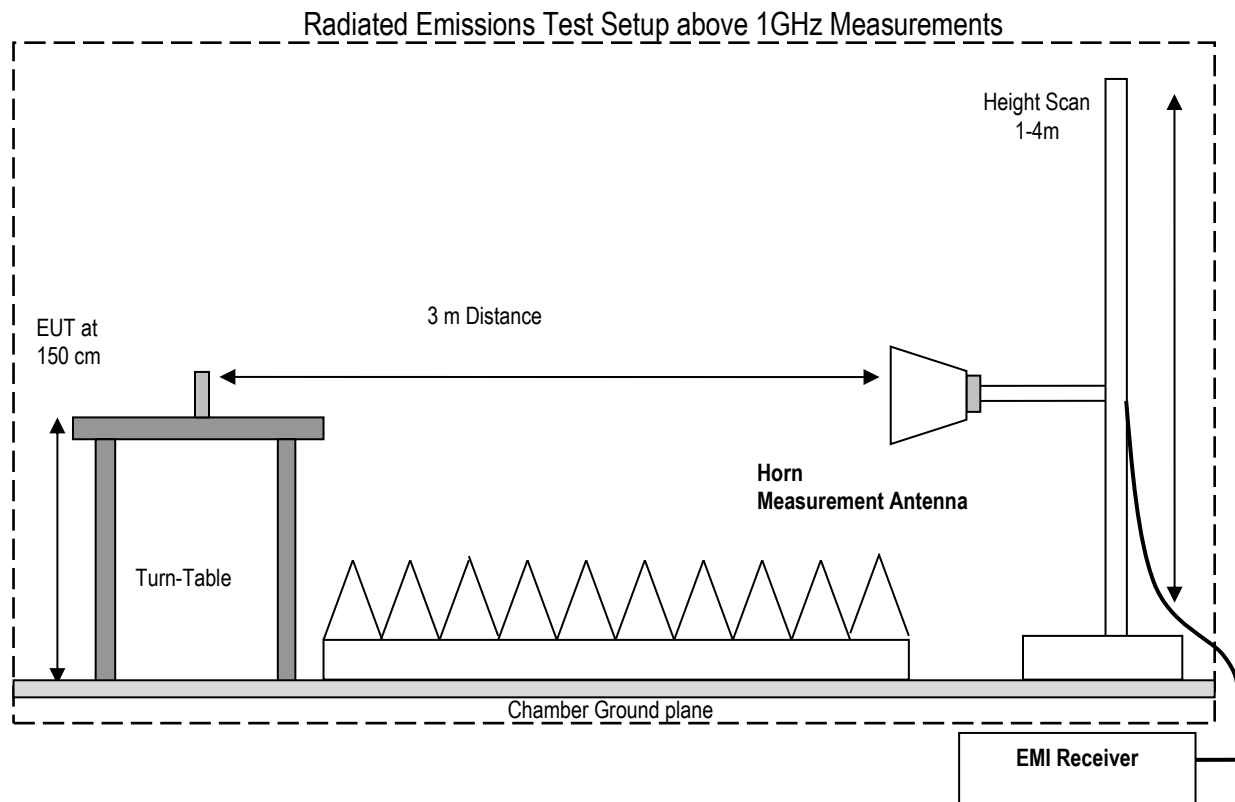
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Radiated Emissions Test Setup below 30MHz Measurements



Radiated Emissions Test Setup 30MHz-1GHz Measurements





7.1.1 Sample Calculations for Field Strength Measurements

Field Strength is calculated from the Spectrum Analyzer/ Receiver readings, taking into account the following parameters:

1. Measured reading in dB μ V
2. Cable Loss between the receiving antenna and SA in dB and
3. Antenna Factor in dB/m

All radiated measurement plots in this report are taken from a test SW that calculates the Field Strength based on the following equation:

$$FS \text{ (dB}\mu\text{V/m)} = \text{Measured Value on SA (dB}\mu\text{V)} - \text{Cable Loss (dB)} + \text{Antenna Factor (dB/m)}$$

Example:

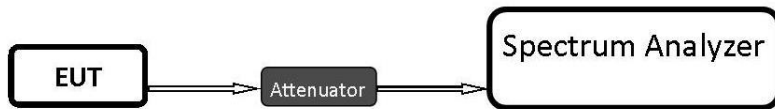
Frequency (MHz)	Measured SA (dB μ V)	Cable Loss (dB)	Antenna Factor Correction (dB)	Field Strength Result (dB μ V/m)
1000	80.5	3.5	14	98.0

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7.2 RF Conducted Measurement Procedure

Testing procedures are based on 558074 D01 15.247 Meas Guidance v05r01 – “GUIDANCE FOR COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEM, FREQUENCY HOPPING SPREAD SPECTRUM SYSTEM, AND HYBRID SYSTEM DEVICES OPERATING UNDER SECTION 15.247 OF THE FCC RULES” - February 11, 2019, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.



- Connect the equipment as shown in the above diagram.
- Adjust the settings of the SA (Rohde-Schwarz Spectrum Analyzer) to connect the EUT at the required mode of test.
- Measurements are to be performed with the EUT set to the low, middle and high channels and for worst case modulation schemes.
- Calculate the conducted power by taking into account attenuation of the cable and the attenuator

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8 Test Result Data

8.1 Maximum Peak Conducted Output Power

8.1.1 Measurement according to FCC 558074 D01 15.247 Meas Guidance v05r01

Spectrum Analyzer settings:

- RBW $\geq$ DTS bandwidth
- VBW $\geq 3 \times$ RBW
- Span $\geq 3 \times$ RBW
- Sweep = Auto couple
- Detector function = Peak
- Trace = Max hold
- Use peak marker function to determine the peak amplitude level

8.1.2 Limits:

Maximum Peak Output Power:

- FCC §15.247 (b)(1): 1 W
- IC RSS-247: 1 W

8.1.3 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
23.1° C	1	BTLE continuous fixed channel	12 VDC	0.5 dBi

8.1.4 Measurement result:

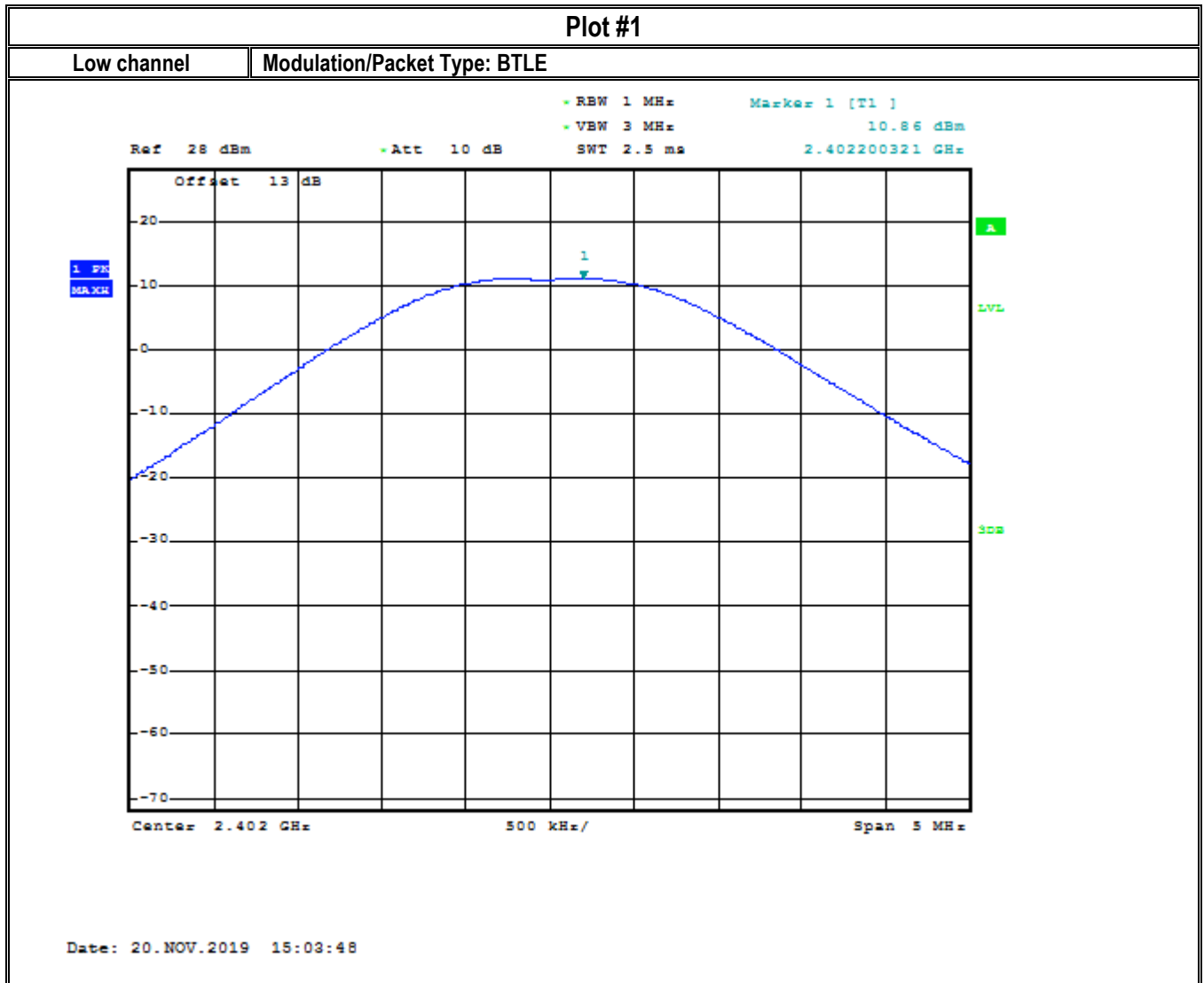
Attenuation of cable and attenuator (already taken into account): 13 dB

Plot #	Frequency (MHz)	Maximum Peak Conducted Output Power (dBm)	EIRP (dBm)	Limit (dBm)	Result
1	2402	10.86	11.36	30 (Pk) / 36 (EIRP)	Pass
2	2440	11.15	11.65	30 (Pk) / 36 (EIRP)	Pass
3	2480	11.13	11.63	30 (Pk) / 36 (EIRP)	Pass

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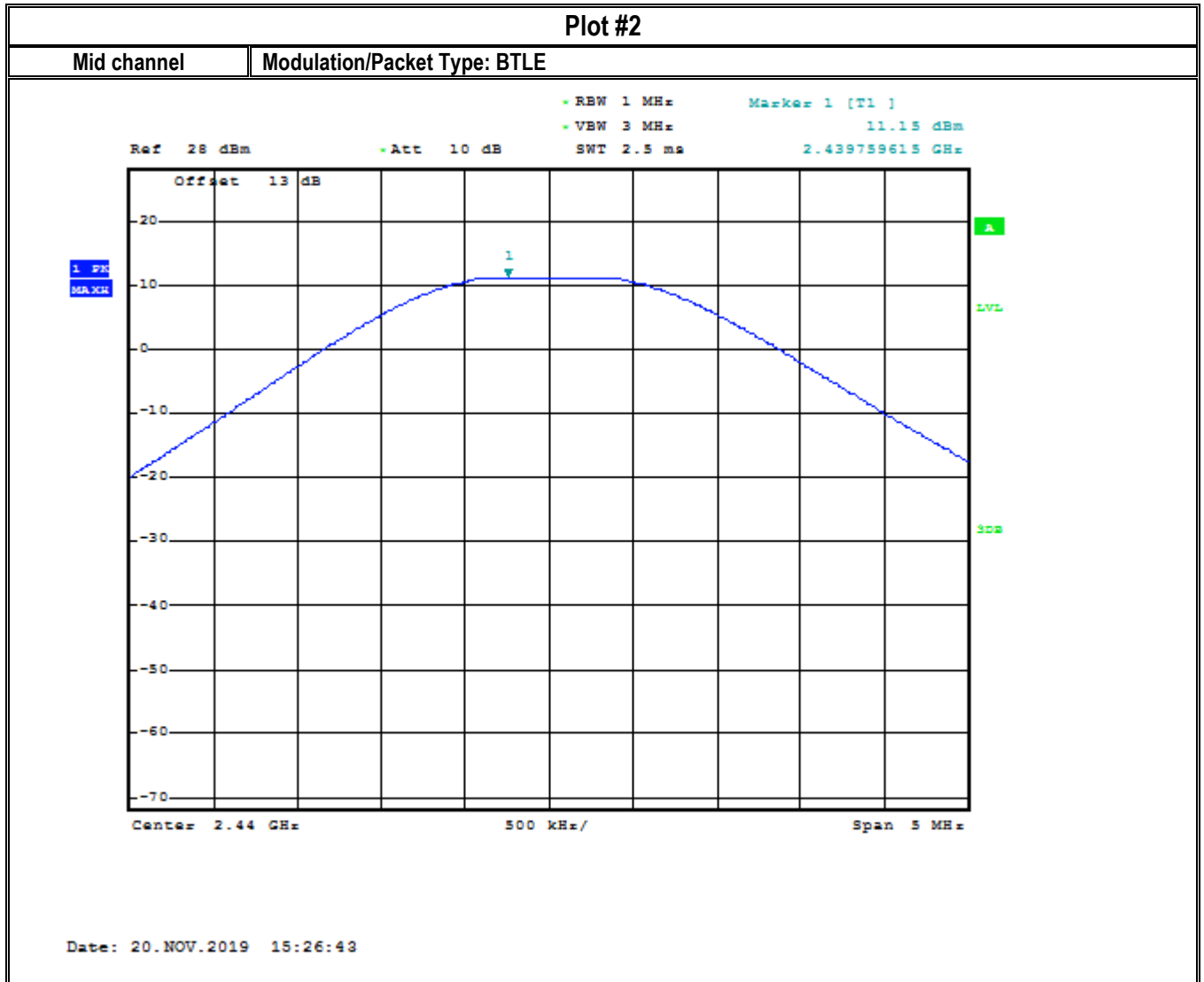
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8.1.5 Measurement Plots:



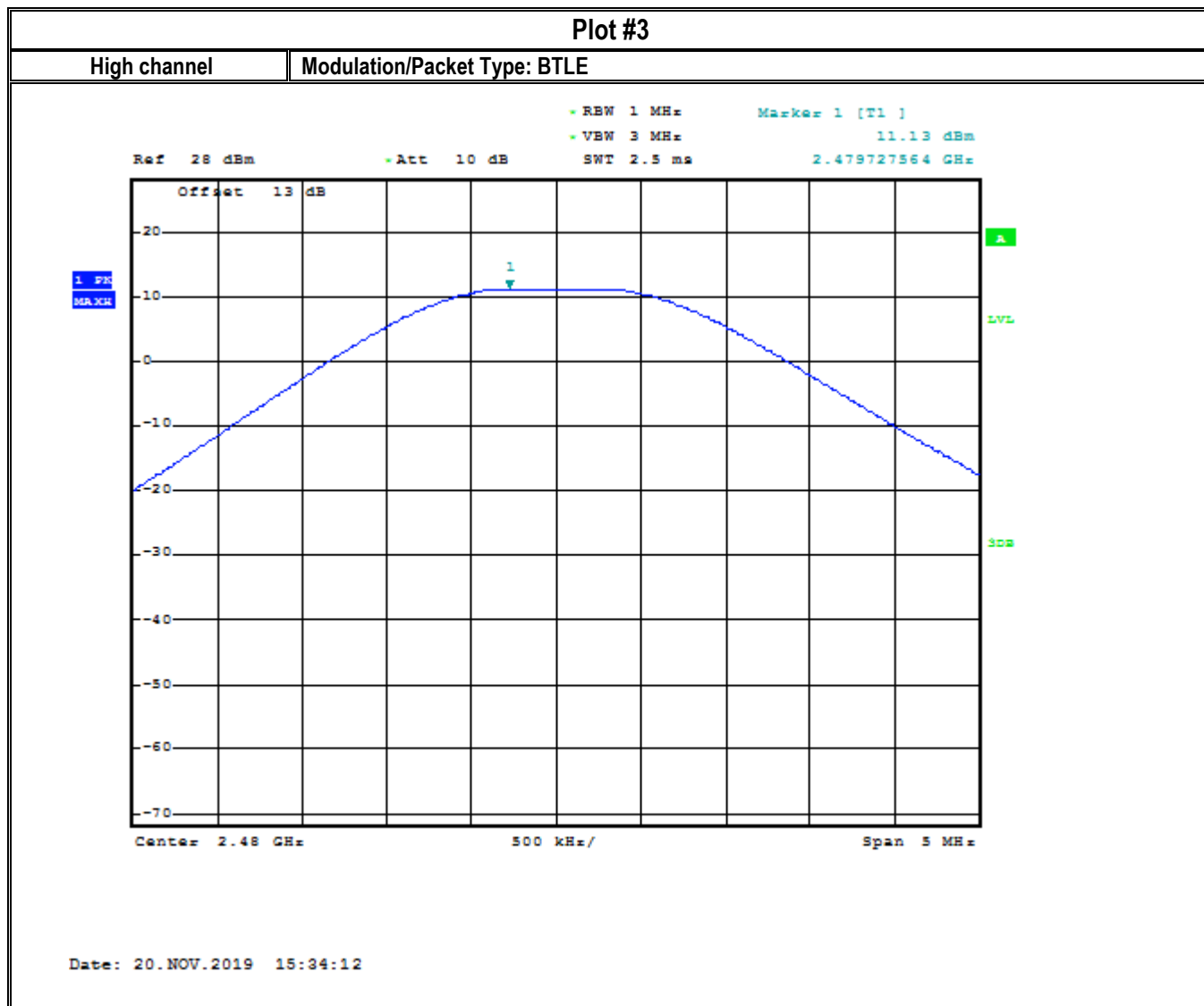
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8.2 Power Spectral Density

8.2.1 Measurement according to FCC 558074 D01 15.247 Meas Guidance v05r01

Spectrum Analyzer settings for Peak PSD method:

- Set analyzer center frequency to DTS channel center frequency
- Set the span to 1.5 x DTS bandwidth
- Set RBW to: $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$
- Set the VBW $\geq 3 \times \text{RBW}$
- Detector = Peak
- Sweep time = Auto couple
- Trace mode = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level within the RBW
- If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat

8.2.2 Limits:

FCC§15.247(e) & RSS-247 5.2(2)

- For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

8.2.3 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
23.1° C	1	BTLE continuous fixed channel	12 VDC	0.5 dBi

8.2.4 Measurement result:

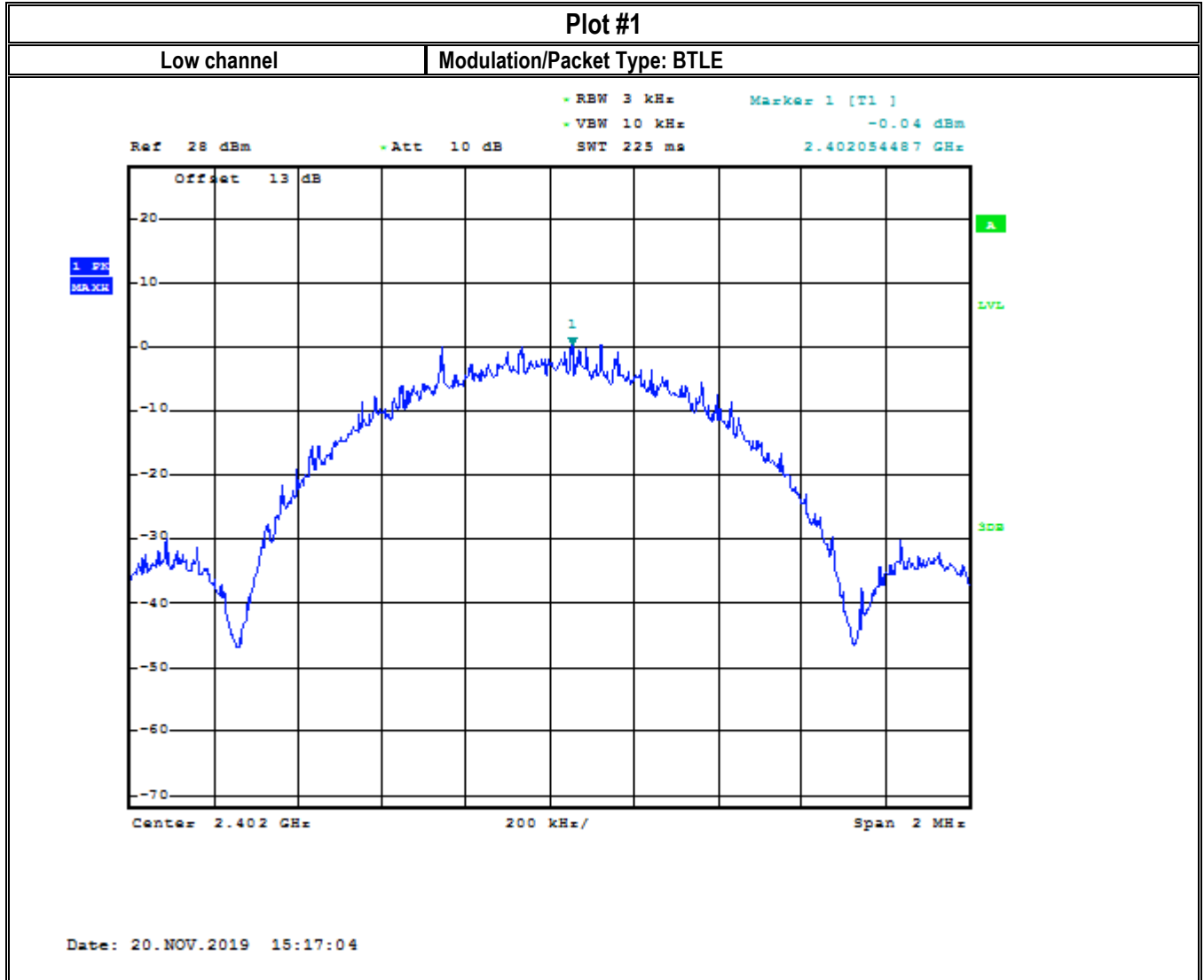
Attenuation of cable and attenuator (already taken into account): 13 dB

Plot #	Frequency (MHz)	Maximum Power Spectral Density (dBm/3 kHz)	PSD Adjusted for Antenna Gain (dBm/3 kHz)	Limit (dBm / 3 kHz)	Result
1	2402	-0.04	0.46	8	Pass
2	2440	1.12	1.62	8	Pass
3	2480	1.45	1.95	8	Pass

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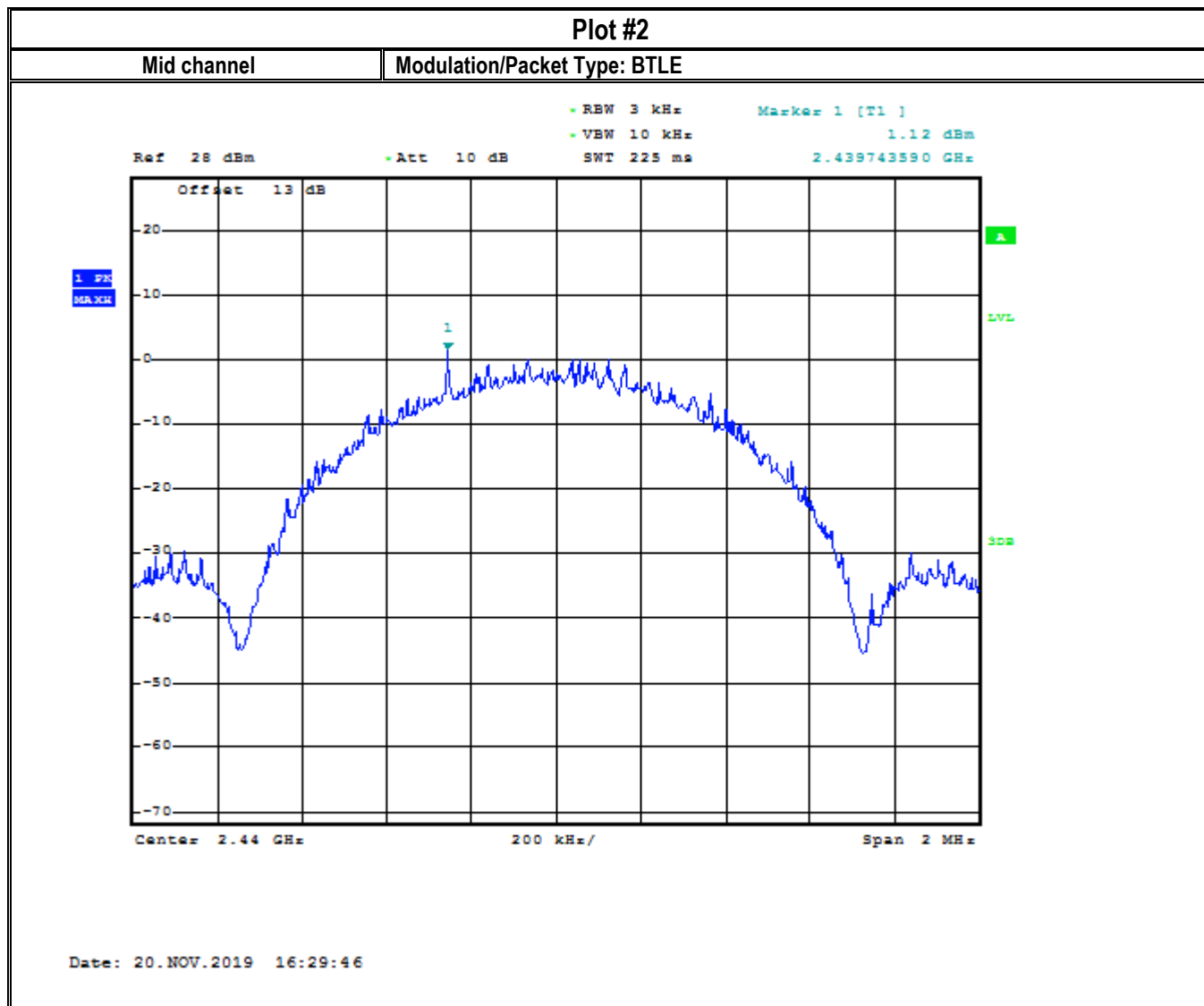
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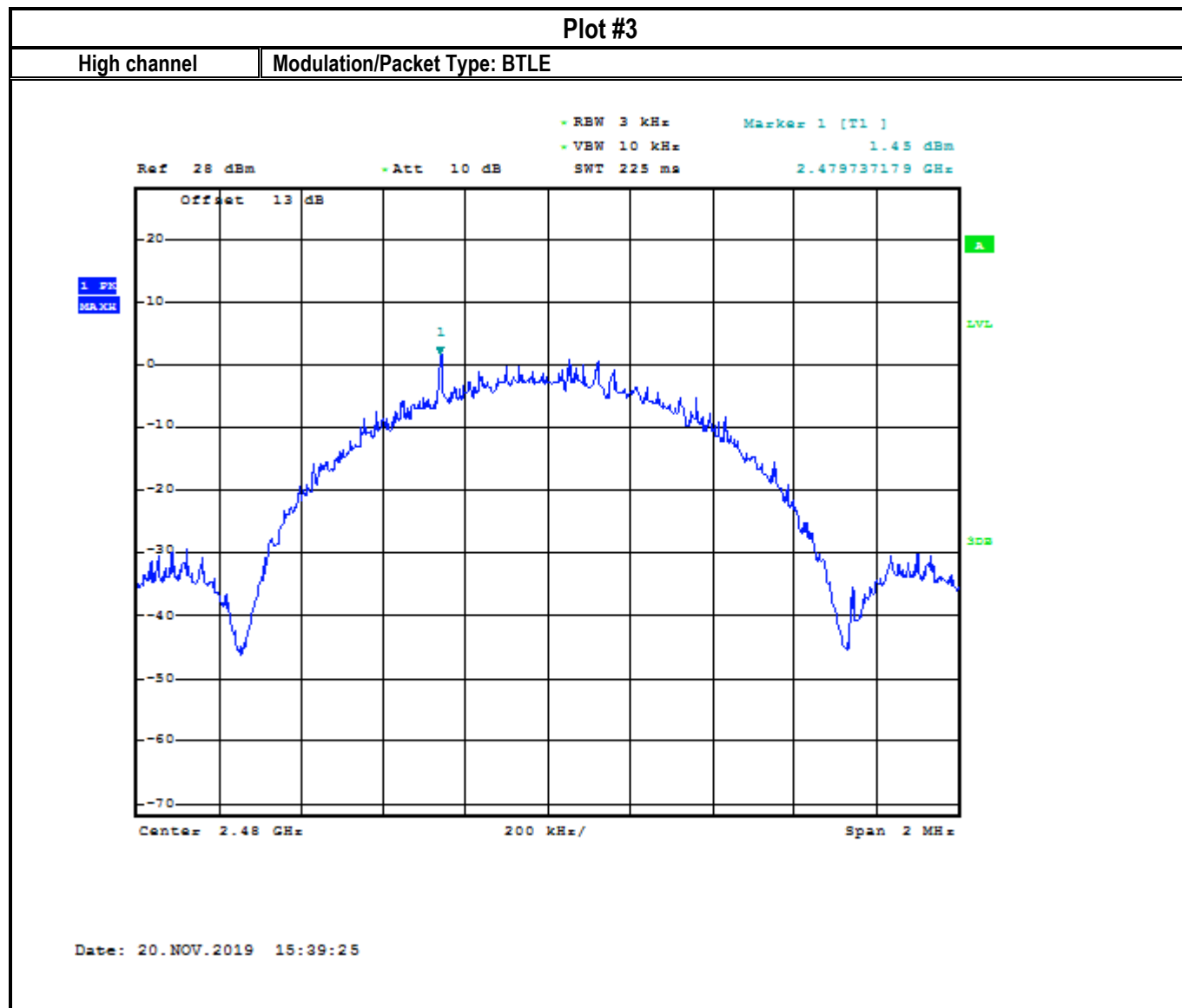
8.2.5 Measurement Plots:



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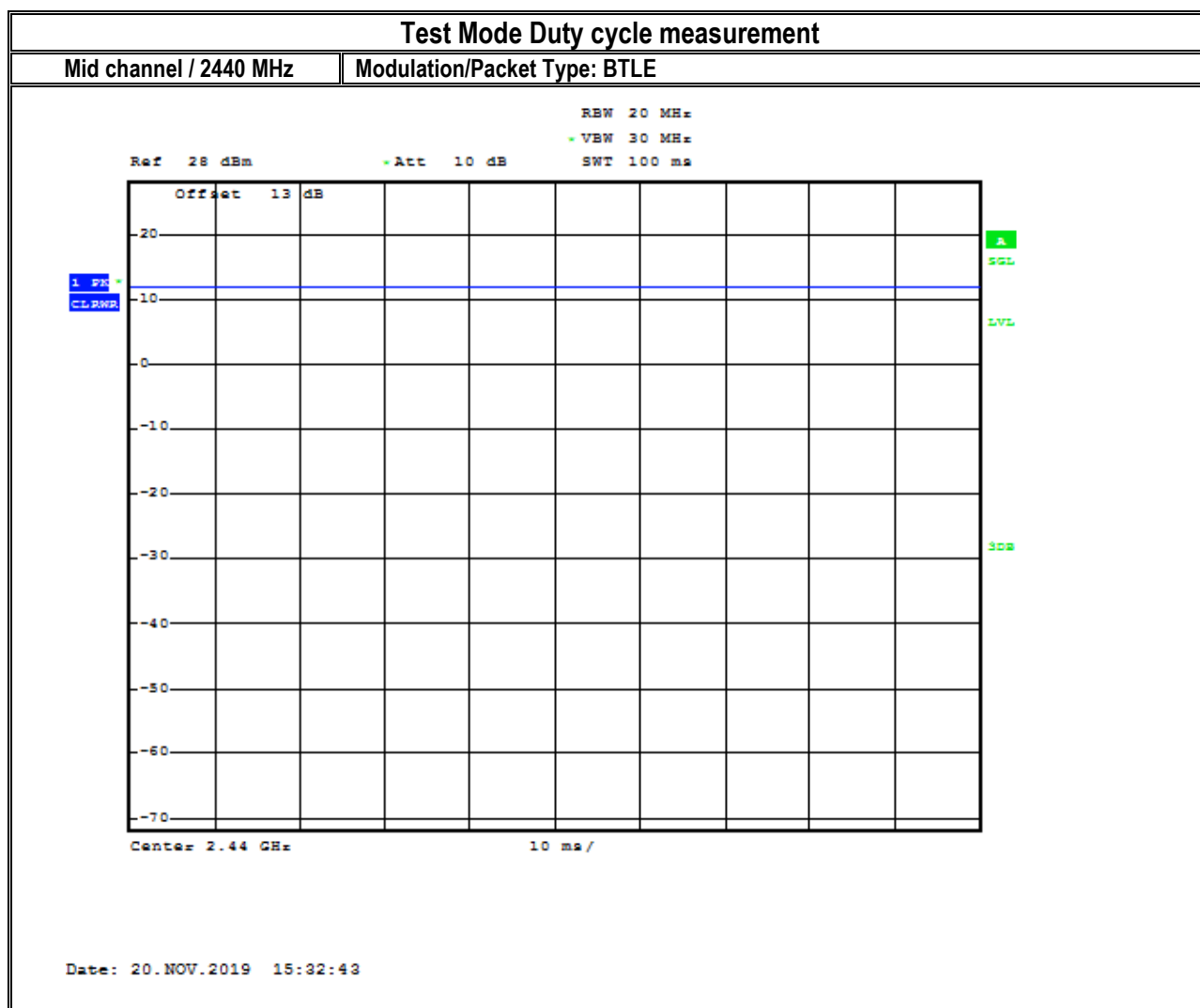
8.3 Duty cycle

8.3.1 Measurement according to FCC 558074 D01 15.247 Meas Guidance v05r01

Spectrum Analyzer settings:

- Set the center frequency and of the instrument to the center frequency of the transmission
- Zero span
- Set RBW $\geq$ OBW if possible; otherwise, set RBW to the largest available value
- Detector = Peak or average

8.3.2 Measurement result



Test Mode Duty cycle = 100%

Duty cycle correction factor = $10 \cdot \log(1/1) = 0$ dB

8.4 Band Edge Compliance

8.4.1 Measurement according to FCC 558074 D01 15.247 Meas Guidance v05r01

Spectrum Analyzer settings for band edge:

- Set the center frequency and span to encompass frequency range to be measured
- RBW = 100 kHz
- VBW $\geq 3 \times$ RBW
- Sweep Time: Auto couple
- Detector = Peak
- Trace = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level
- Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge

8.4.2 Limits non restricted band:

FCC§15.247 (d)

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

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- In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30dB instead of 20dB.

Spectrum Analyzer settings for restricted band:

- Peak measurements are made using a peak detector and RBW=1 MHz

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8.4.3 Limits restricted band §15.247/15.209/15.205 and RSS-Gen 8.9/8.10

- *PEAK LIMIT= 74 dB μ V/m @3m =-21.23 dBm
 - *AVG LIMIT= 54 dB μ V/m @3m =-41.23 dBm
 - Start frequency & stop frequency according to frequency range specified in the restricted band table in FCC section 15.205 & RSS-Gen 8.10
 - Measurements with a peak detector were used to show compliance to average limits, thus showing compliance to both peak and average limits.
- (a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

(b)

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
10.495-0.505	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2690-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36-13.41			

8.4.4 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
23.1° C	1	BTLE continuous fixed channel	12 VDC	0.5 dBi

8.4.5 Measurement result:

Plot #	EUT operating mode	Band Edge	Band Edge Delta (dBc)	Limit (dBc)	Result
1	BTLE continuous fixed channel	Lower, Non-restricted	58.82	> 20	Pass

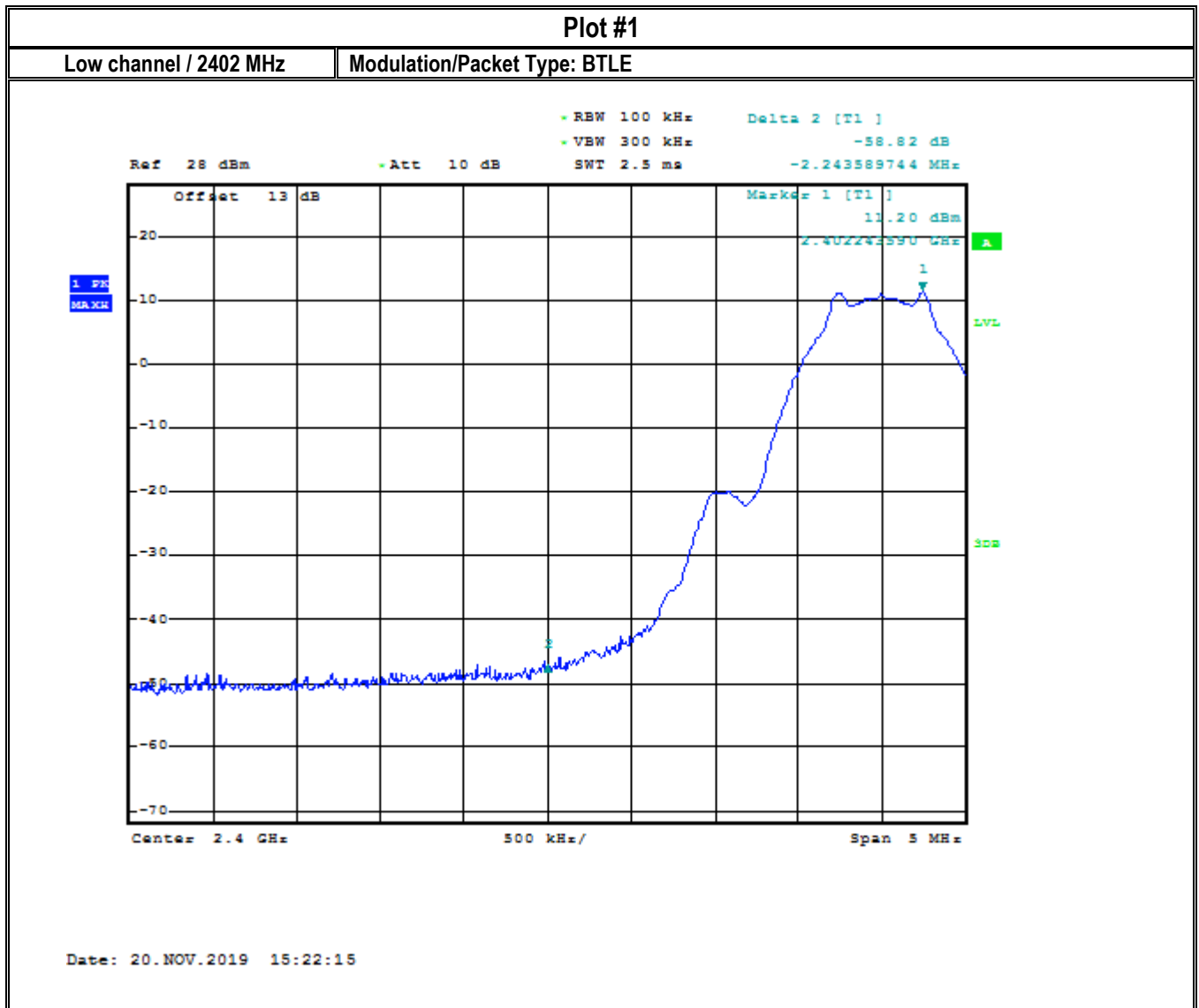
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #	EUT operating mode	Band Edge	Measured Peak Value (dBm)	Corrected by duty cycle (dB) ^{Note}	Corrected by Antenna Gain (dBm)	Limit (dBm)	Result
2	BTLE continuous fixed channel	Upper Restricted peak	-39.98	N/A	-39.48	-21.23 Peak	Pass
3	BTLE continuous fixed channel	Upper Restricted Average	-51.77	0	-51.27	-41.23 AVG	Pass

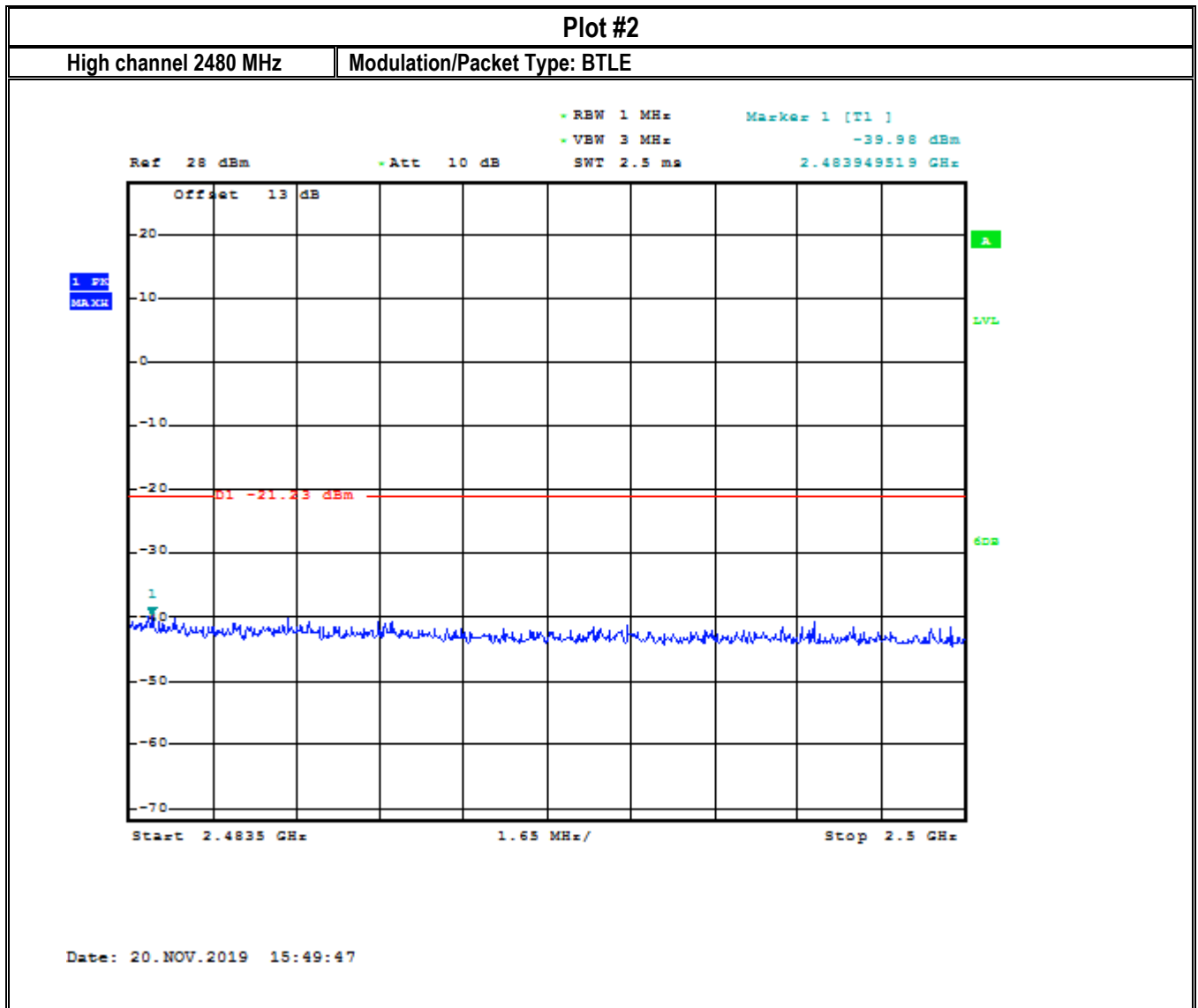
Note: EUT operating in 100% Test Mode Duty Cycle

8.4.6 Measurement Plots:



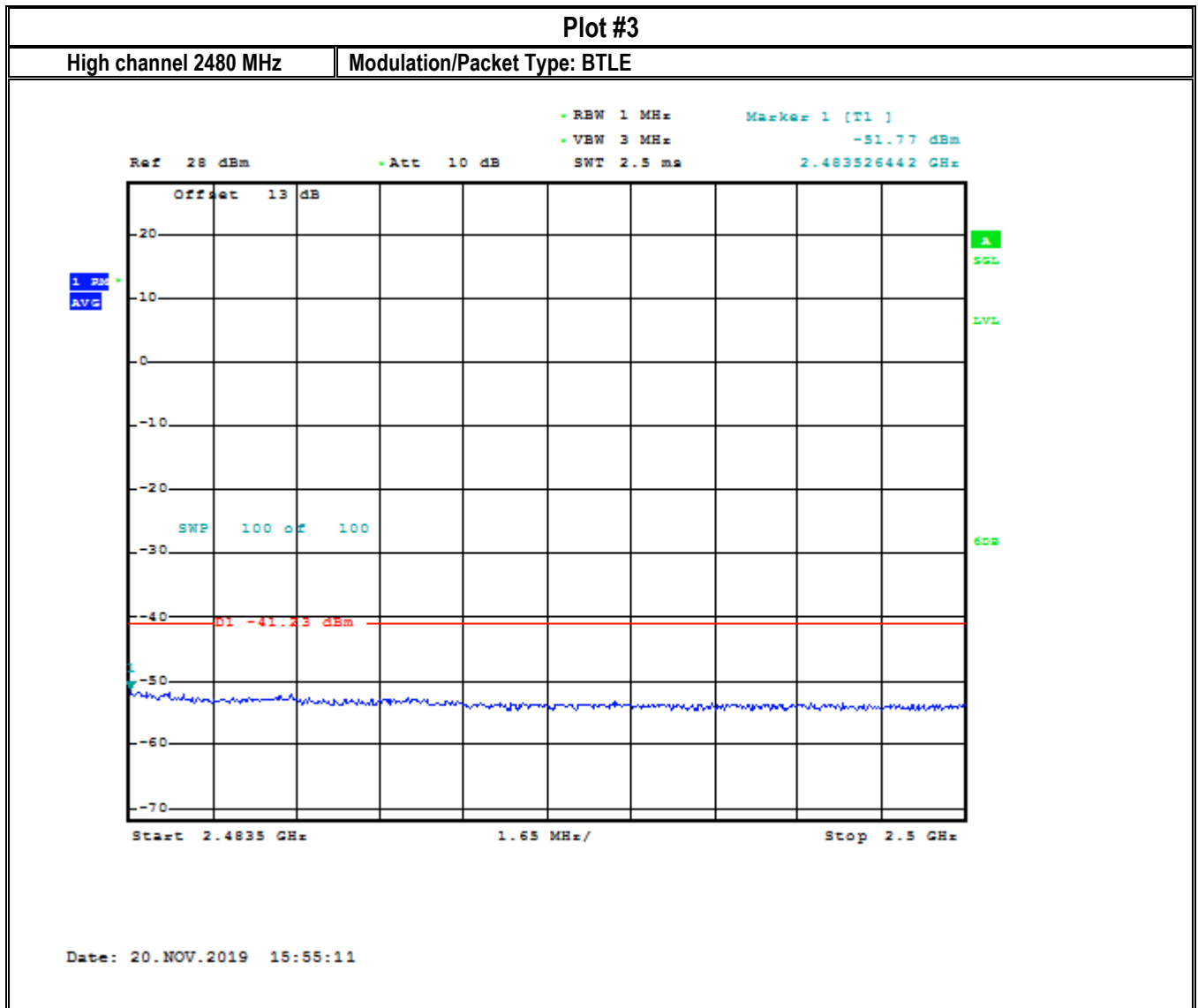
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



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FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

8.5 Emission Bandwidth 6 dB and 99% Occupied Bandwidth

8.5.1 Measurement according to FCC 558074 D01 15.247 Meas Guidance v05r01

Spectrum Analyzer settings:

- Set RBW = 100 kHz
- Set the video bandwidth (VBW) $\geq 3 \times$ RBW
- Detector = Peak
- Trace mode = Max hold
- Sweep = Auto couple
- Allow the trace to stabilize
- Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

8.5.2 Limits:

FCC §15.247(a)(1) and RSS-247 5.2(1)

- Systems using digital modulation techniques may operate in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

8.5.3 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input
23.1° C	1	BTLE continuous fixed channel	12 VDC

8.5.4 Measurement result:

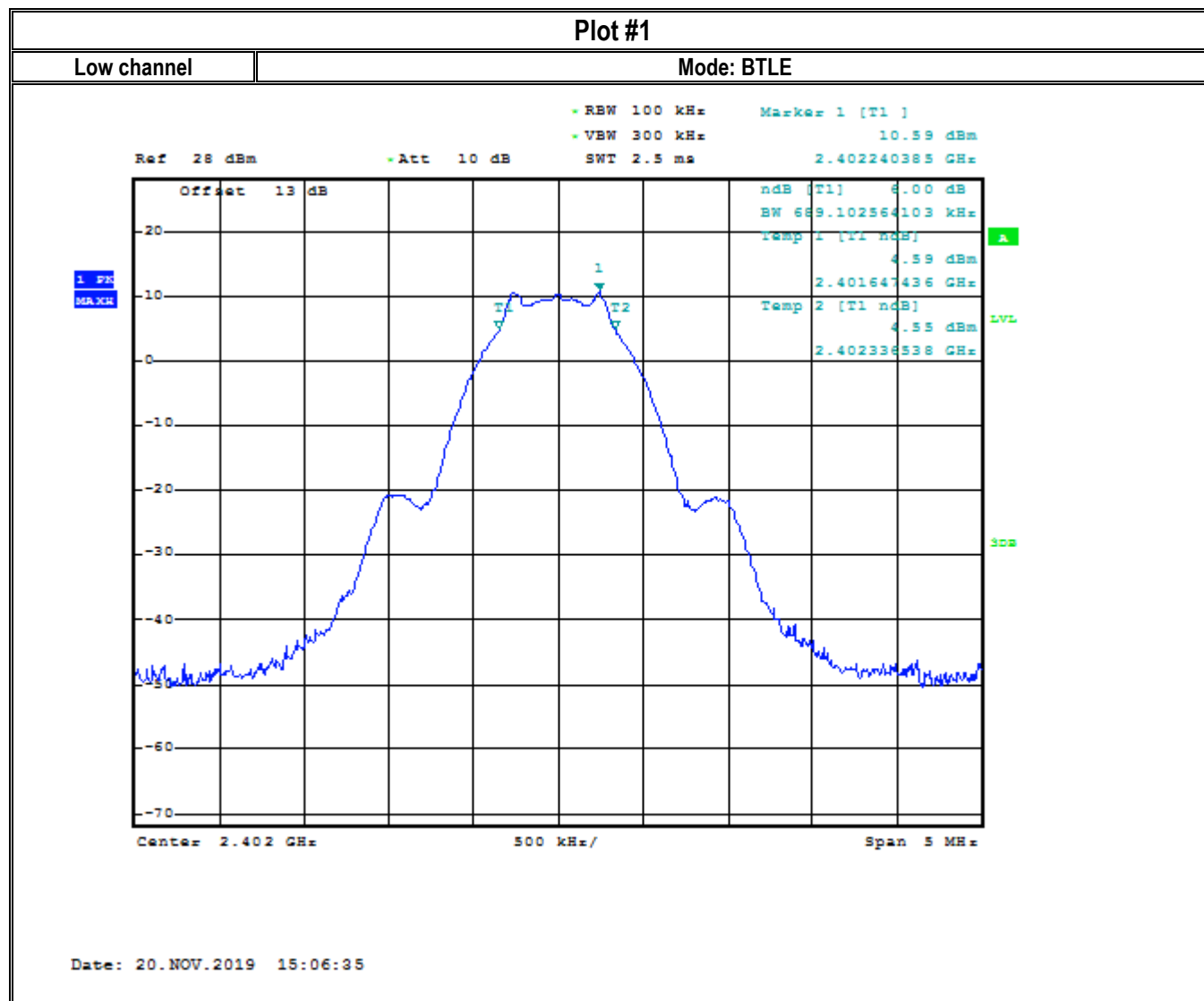
Plot #	Frequency (MHz)	6 dB Emissions Bandwidth (MHz)	Limit (MHz)	Result
1	2402	0.6891	> 0.5	Pass
2	2440	0.6891	> 0.5	Pass
3	2480	0.6891	> 0.5	Pass

Plot #	Frequency (MHz)	99% Occupied Bandwidth (MHz)	Limit (MHz)	Result
4	2402	1.0417	> 0.5	Pass
5	2440	1.0417	> 0.5	Pass
6	2480	1.0417	> 0.5	Pass

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

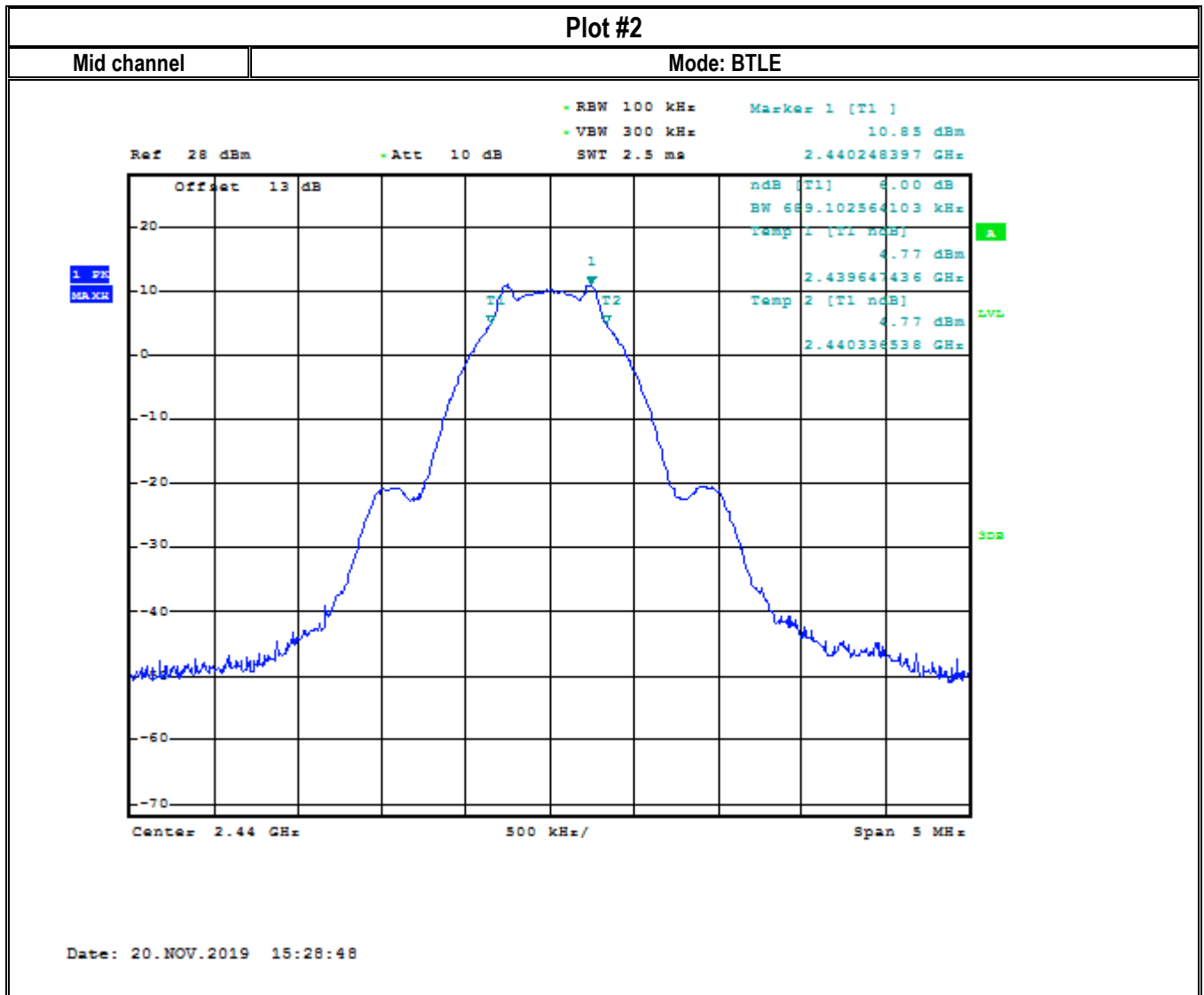
FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

8.5.5 Measurement Plots:



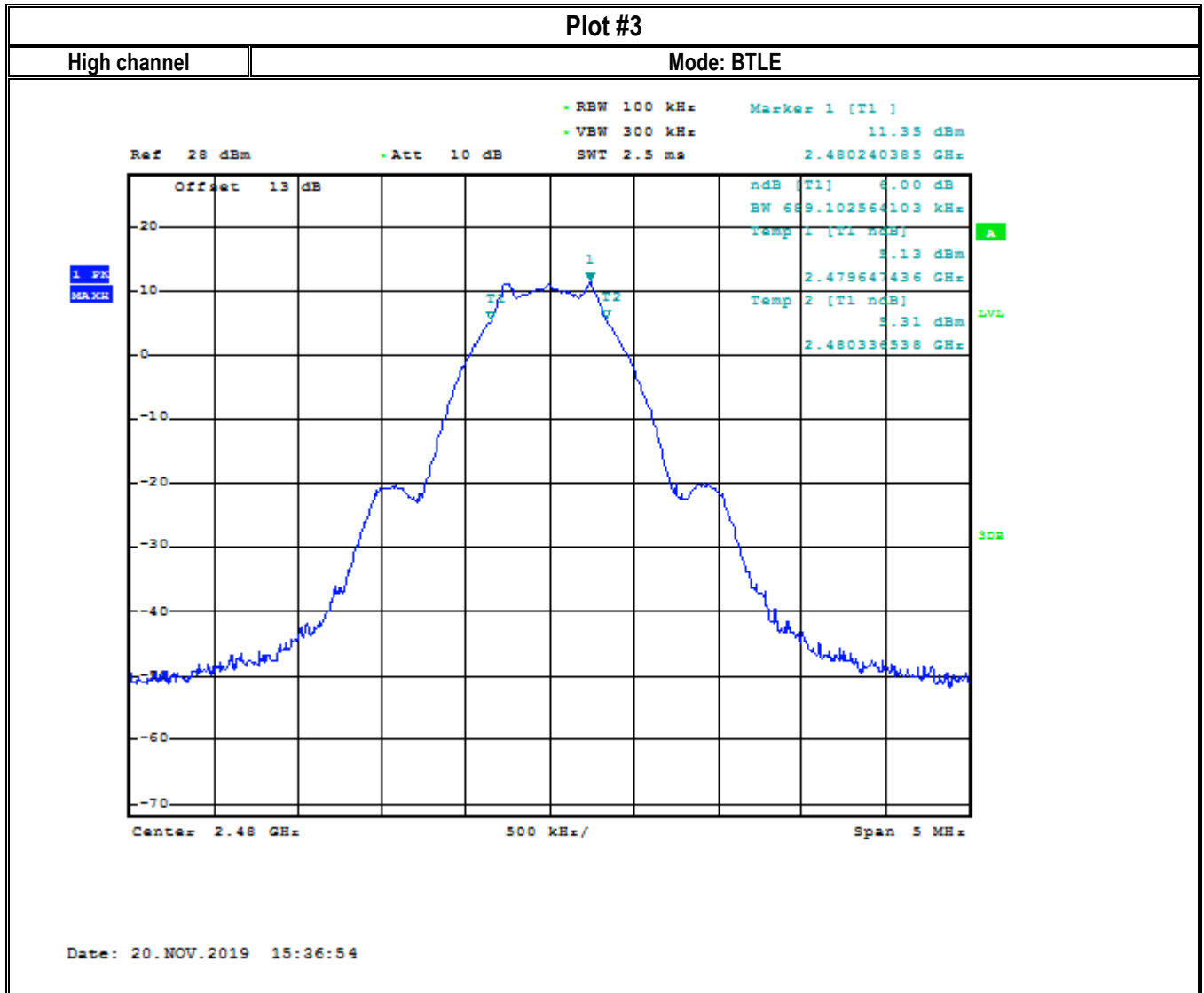
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



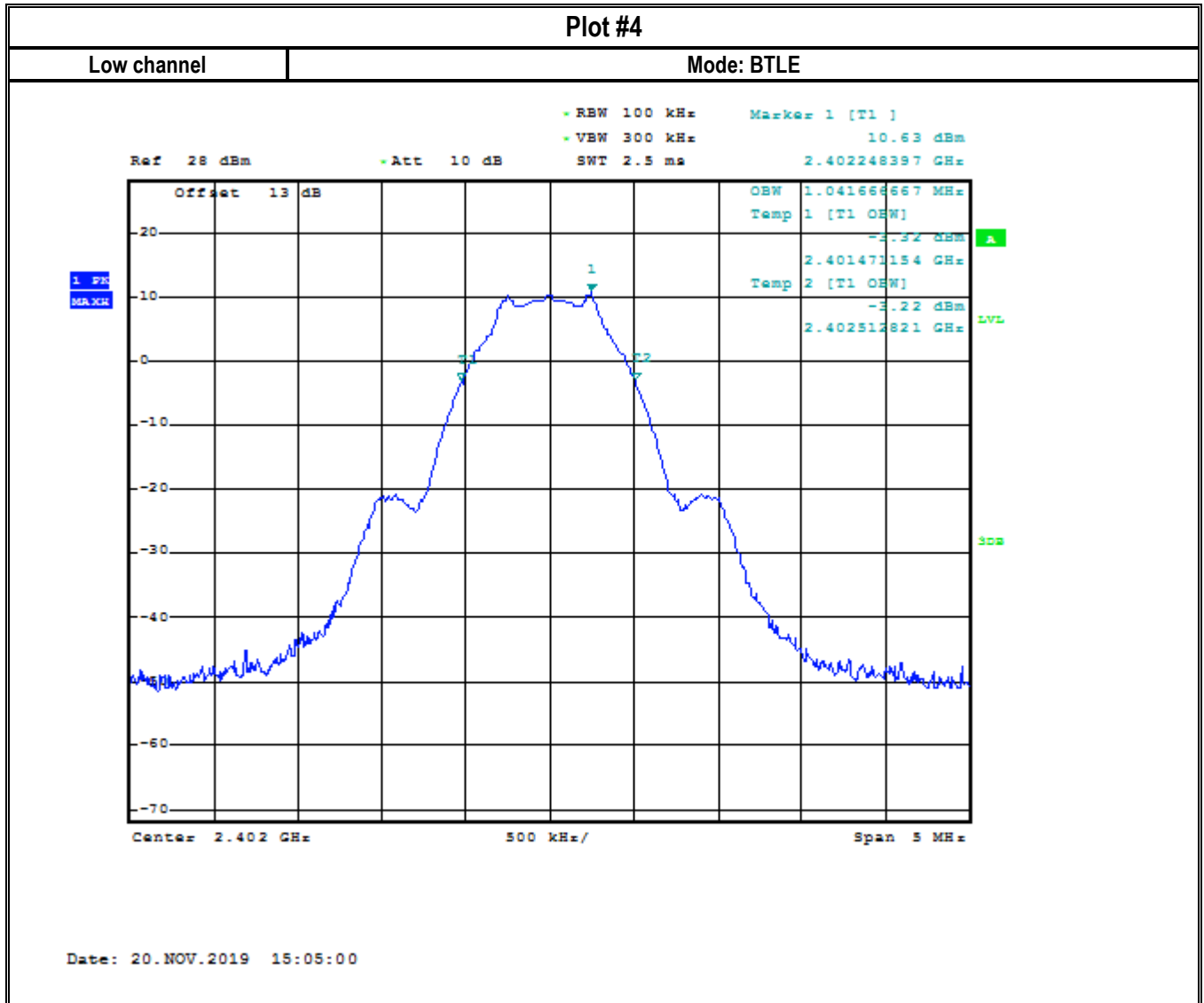
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



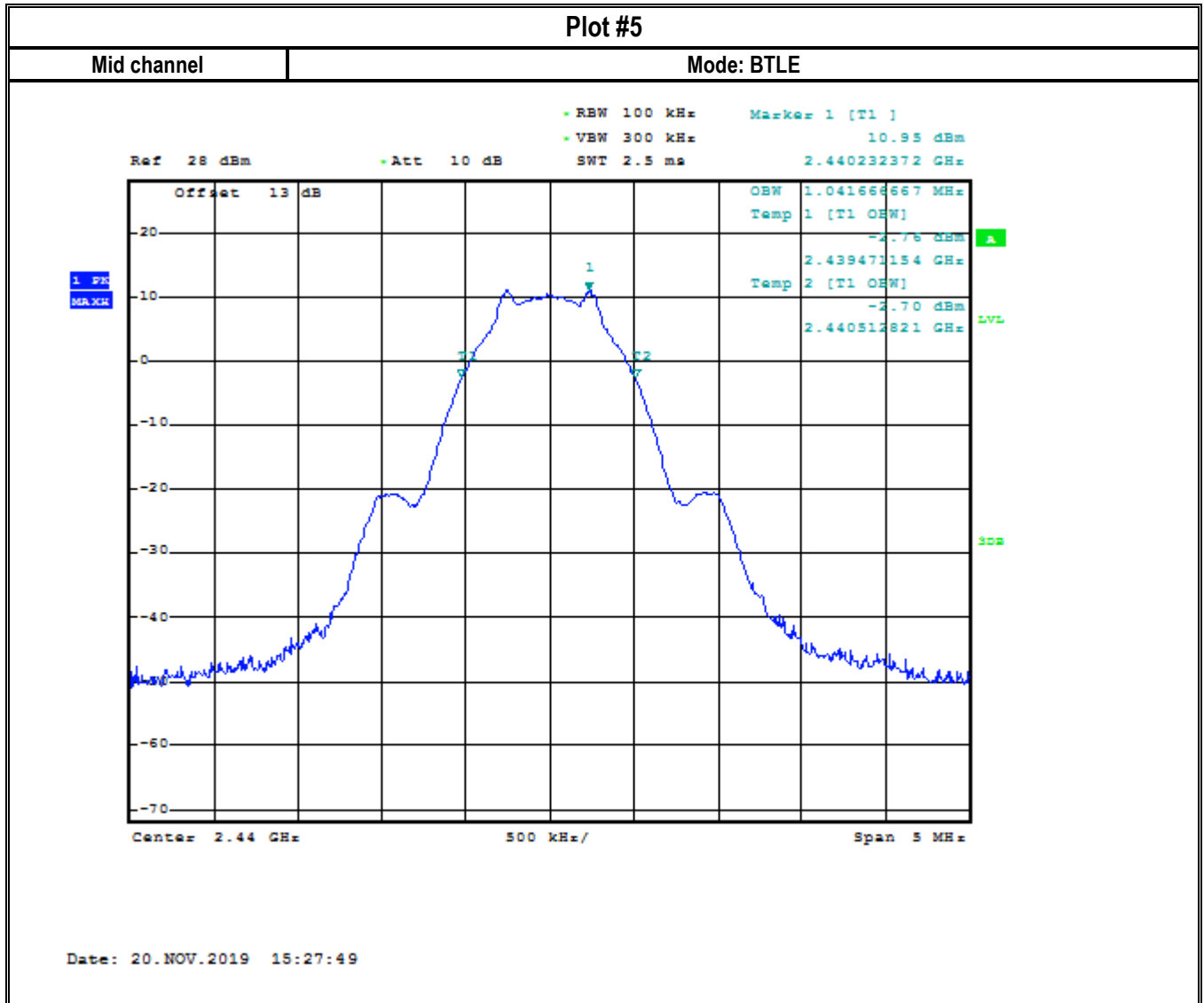
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



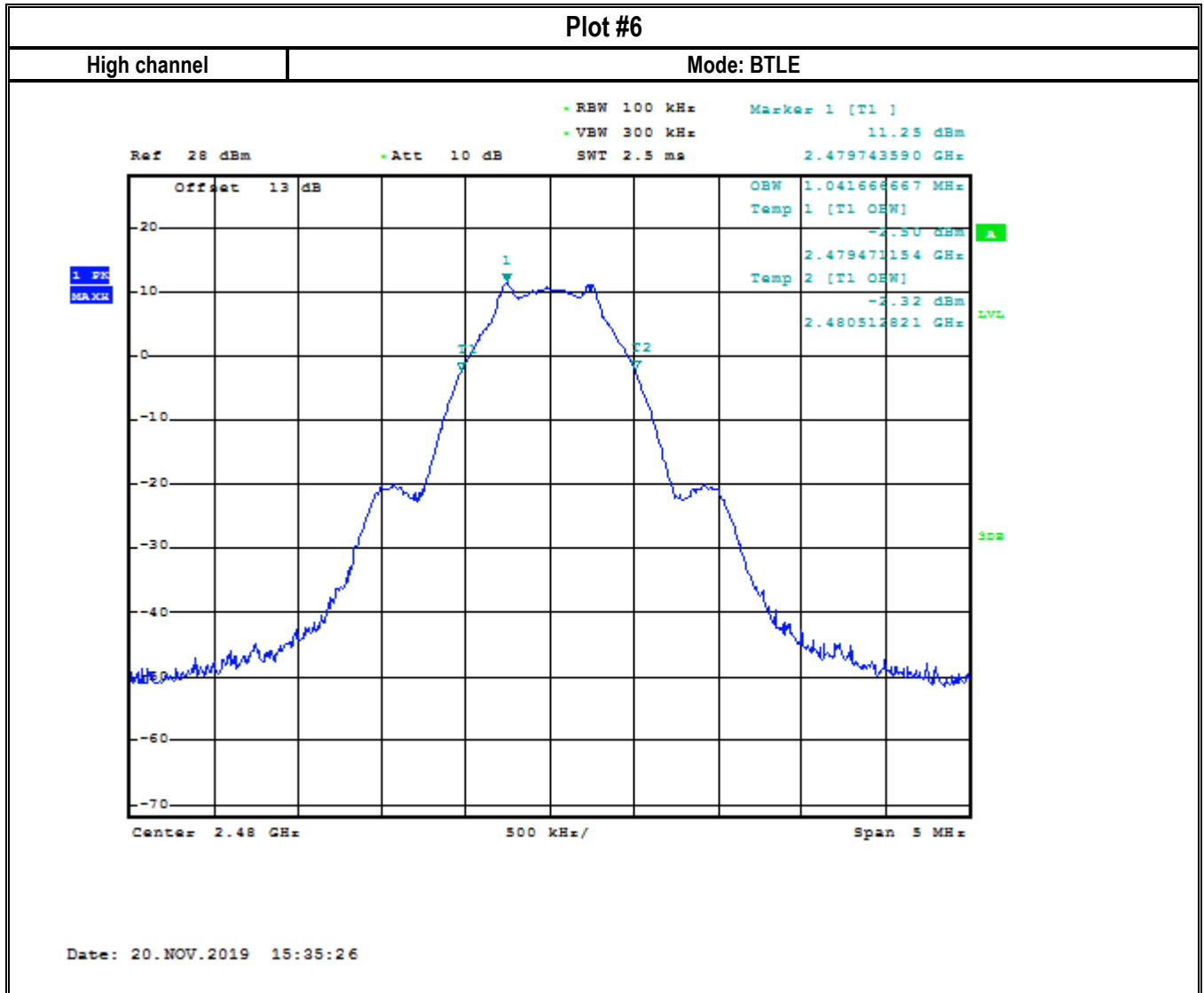
Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



8.6 Radiated Transmitter Spurious Emissions and Restricted Bands

8.6.1 Measurement according to ANSI C63.10 (2013)

Spectrum Analyzer Settings:

- Frequency = 9 KHz – 30 MHz
- RBW = 9 KHz
- Detector: Peak

- Frequency = 30 MHz – 1 GHz
- Detector = Peak / Quasi-Peak
- RBW= 120 KHz (<1GHz)

- Frequency > 1 GHz
- Detector = Peak / Average
- RBW = 1 MHz

- Radiated spurious emissions shall be measured for the transmit frequencies, transmit power, and data rate for the lowest, middle and highest channel in each frequency band of operation and for the highest gain antenna for each antenna type, and using the appropriate parameters and test requirements.
- The highest (or worst-case) data rate shall be recorded for each measurement.
- For testing at distance other than the specified in the standard, the limit conversion is calculated by using 40 dB/decade extrapolation factor as follow: Conversion factor (CF) = $40 \log (D/d) = 40 \log (300\text{m} / 3\text{m}) = 80\text{dB}$

8.6.2 Limits:

FCC §15.247

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

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FCC §15.209 & RSS-Gen 8.9

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

Frequency of emission (MHz)	Field strength (μV/m)	Measurement Distance (m)	Field strength @ 3m (dBμV/m)
0.009–0.490	2400/F(kHz) / -----	300	-
0.490–1.705	24000/F(kHz) / -----	30	-
1.705–30.0	30 / (29.5)	30	-
30–88	100	3	40 dBμV/m
88–216	150	3	43.5 dBμV/m
216–960	200	3	46 dBμV/m
Above 960	500	3	54 dBμV/m

FCC §15.205 & RSS-Gen 8.10

- Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
10.495-0.505	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2690-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36-13.41			

- Radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

*PEAK LIMIT= 74 dBμV/m

*AVG. LIMIT= 54 dBμV/m

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FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

8.6.3 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input
23.1° C	2	BTLE continuous fixed channel	12 VDC

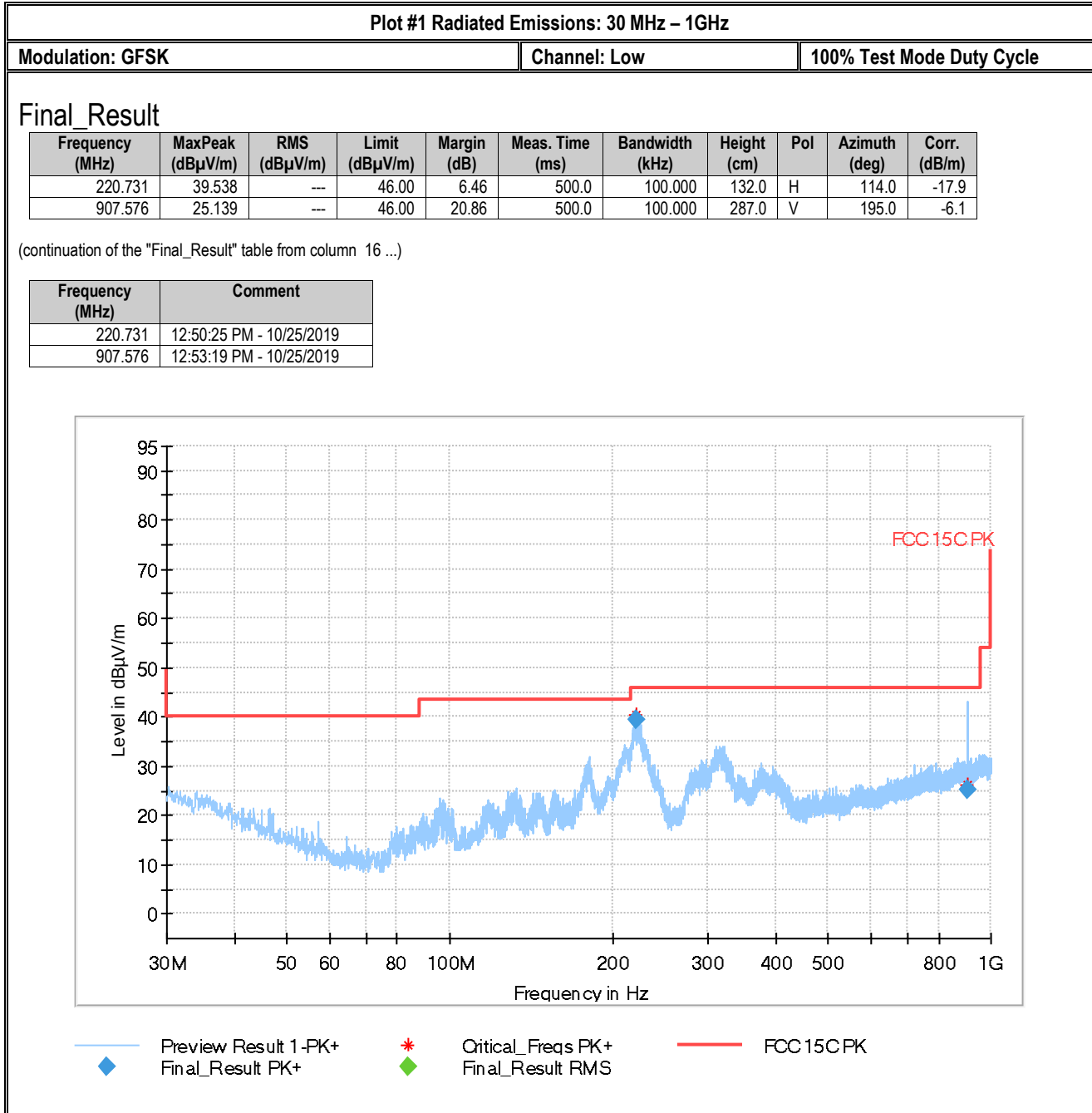
8.6.4 Measurement result:

Plot #	Channel #	Scan Frequency	Limit	Result
1-3	Low	30 MHz – 18 GHz	See section 8.6.2	Pass
4-8	Mid	9 kHz – 26 GHz	See section 8.6.2	Pass
9-11	High	30 MHz – 18 GHz	See section 8.6.2	Pass

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
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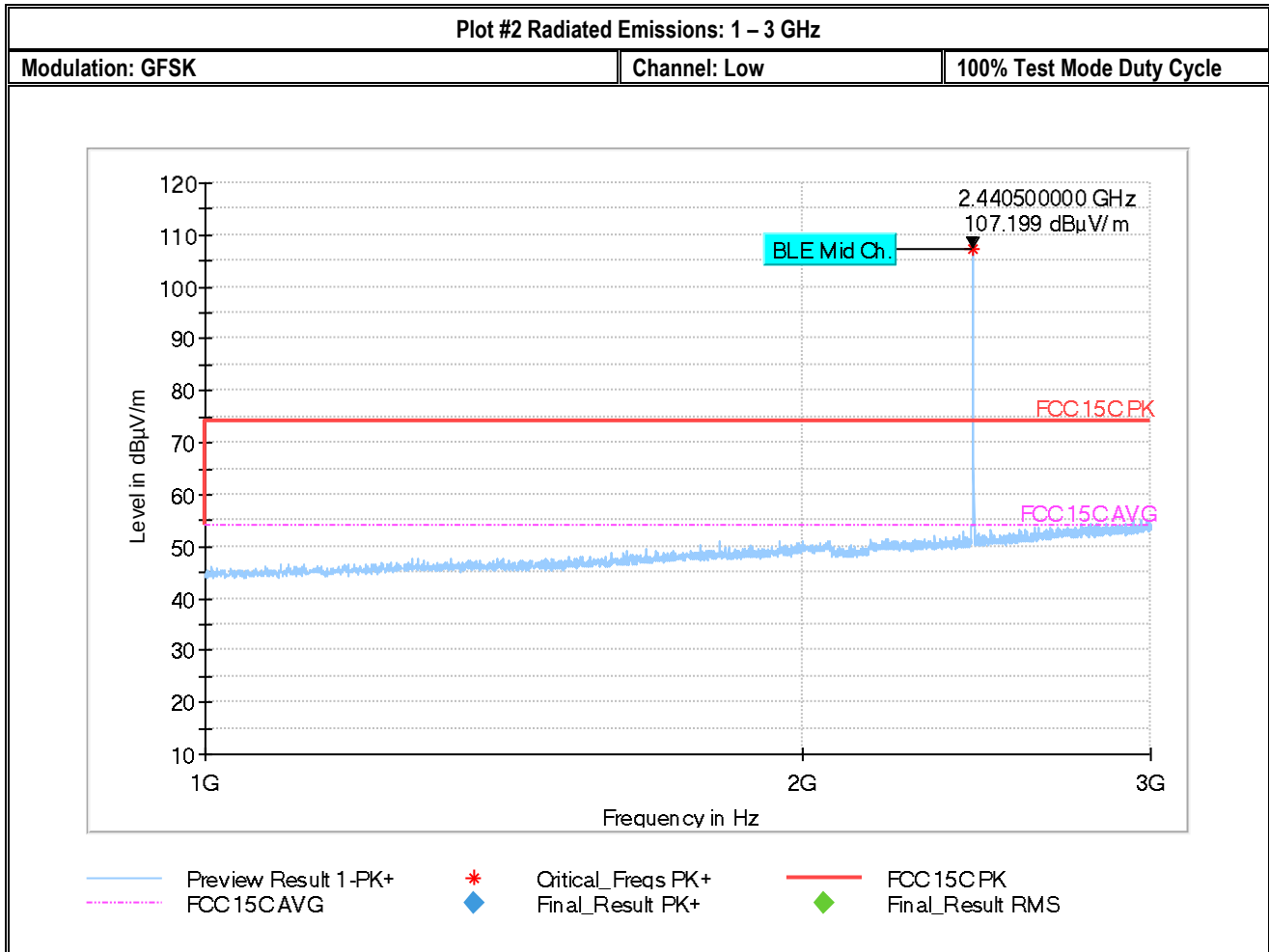
FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

8.6.5 Measurement Plots:



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #3 Radiated Emissions: 3 – 18 GHz

Modulation: GFSK

Channel: Low

100% Test Mode Duty Cycle

Final_Result

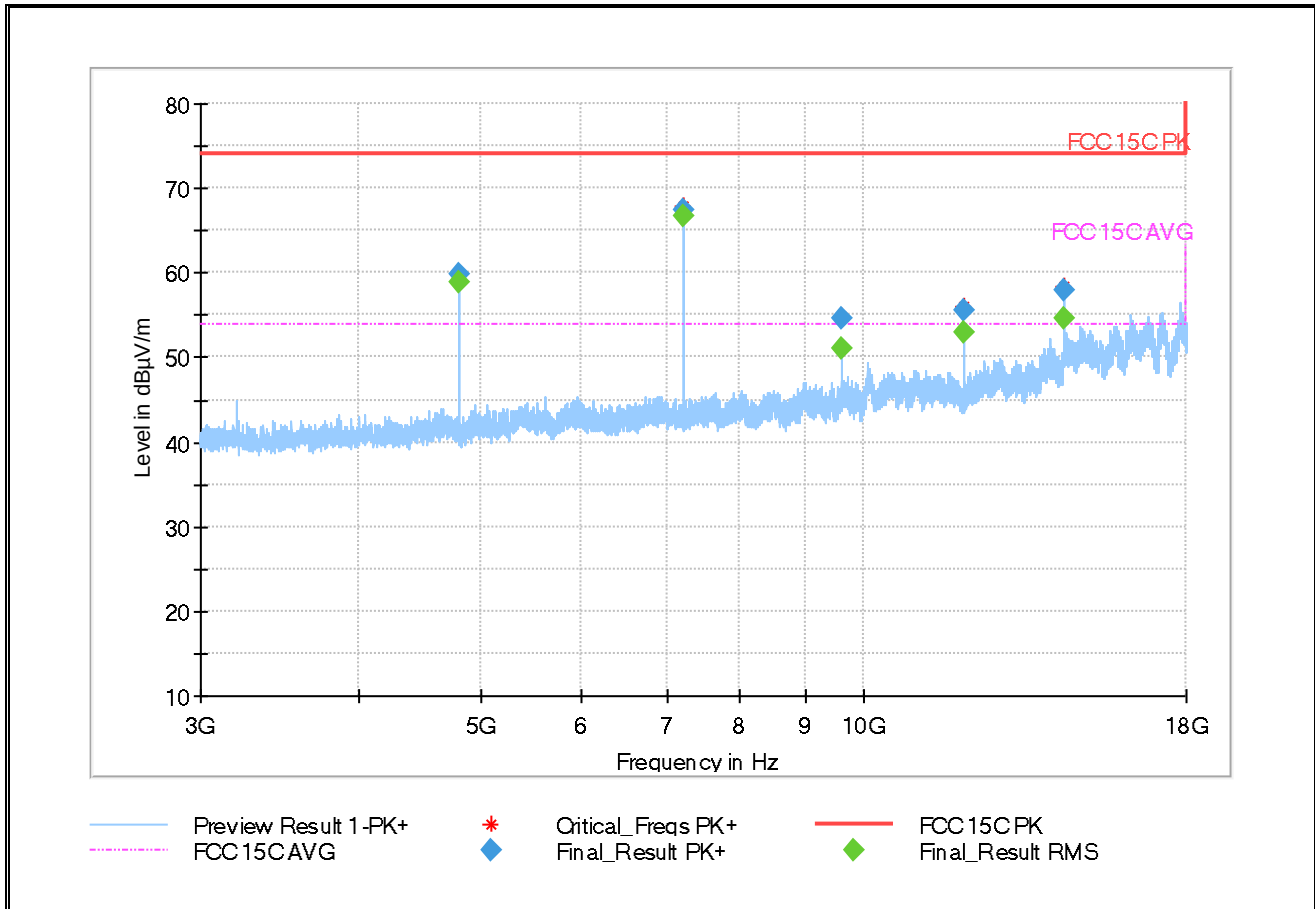
Frequency (MHz)	MaxPeak (dBμV/m)	RMS (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
4804.546	---	58.799	53.98	-4.82	200.0	1000.000	100.0	H	177.0	-6.0
4804.546	59.938	---	73.99	14.05	200.0	1000.000	100.0	H	177.0	-6.0
7206.752	67.332	---	73.99	6.65	200.0	1000.000	145.0	H	75.0	-2.8
7206.752	---	66.789	53.98	-12.81	200.0	1000.000	145.0	H	75.0	-2.8
9608.865	54.526	---	73.98	19.46	200.0	1000.000	107.0	V	70.0	2.8
9608.865	---	51.067	53.98	2.91	200.0	1000.000	107.0	V	70.0	2.8
12011.236	55.660	---	73.98	18.32	10.0	1000.000	157.0	H	131.0	4.6
12011.236	---	52.984	53.98	1.00	10.0	1000.000	157.0	H	131.0	4.6
14413.700	57.818	---	73.98	16.16	10.0	1000.000	132.0	H	150.0	8.6
14413.700	---	54.517	53.98	-0.54	10.0	1000.000	132.0	H	150.0	8.6

(continuation of the "Final_Result" table from column 16 ...)

Frequency (MHz)	Comment
4804.546	11:54:51 AM - 10/23/2019
4804.546	11:54:51 AM - 10/23/2019
7206.752	11:45:03 AM - 10/23/2019
7206.752	11:45:03 AM - 10/23/2019
9608.865	11:58:24 AM - 10/23/2019
9608.865	11:58:24 AM - 10/23/2019
12011.236	11:48:22 AM - 10/23/2019
12011.236	11:48:22 AM - 10/23/2019
14413.700	11:51:35 AM - 10/23/2019
14413.700	11:51:35 AM - 10/23/2019

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

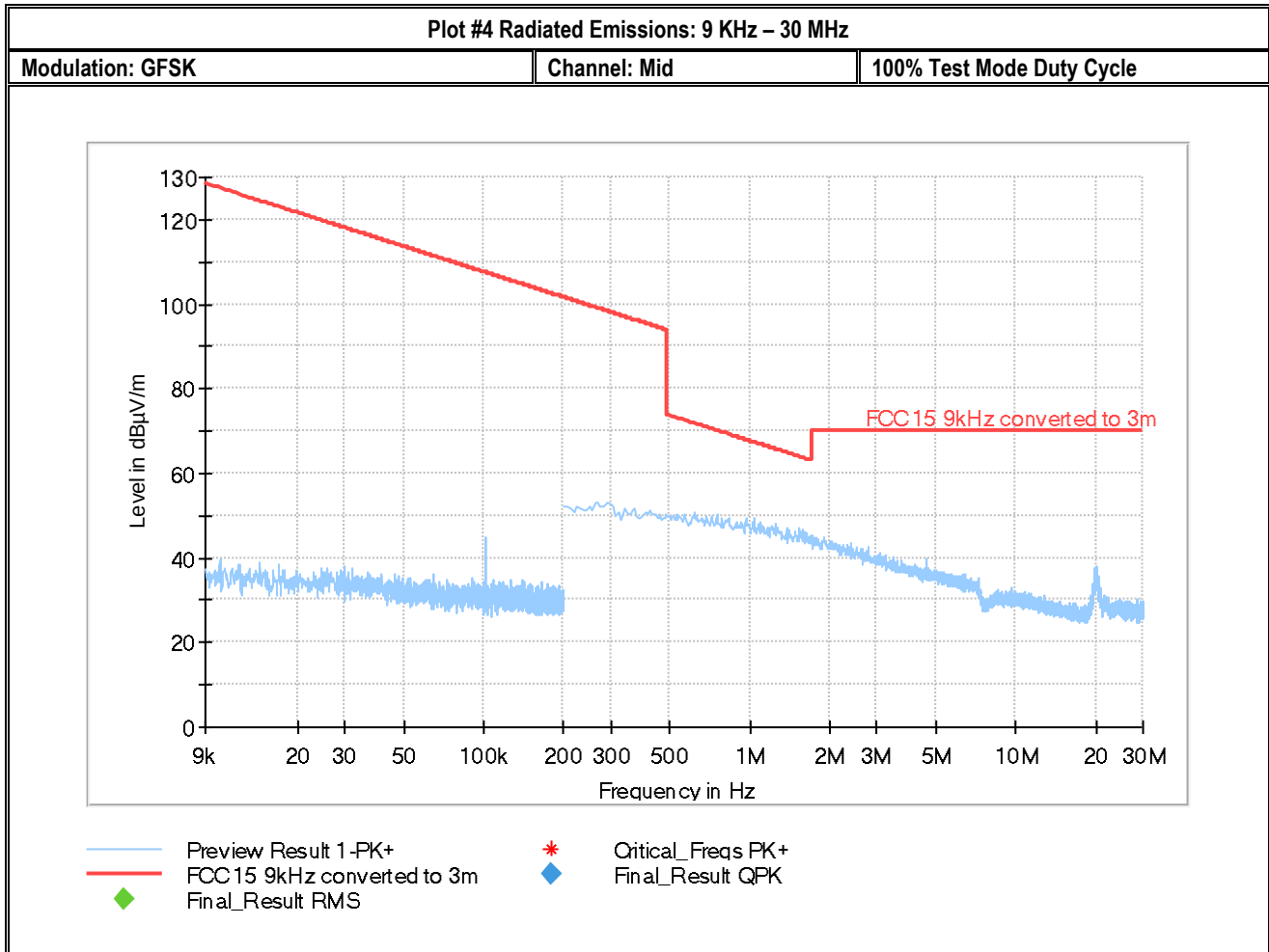
FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Note: Based on the maximum data payload/packet, maximum number of packet per interval, and minimum connection interval of BTLE 4.0, the duty cycle in normal operating mode is 12.8%. The duty cycle correction factor is calculated to be 17.86 dB and is applied to the margin. Worst case margin is at frequency 7206.752 MHz for peak measurement. By applying the duty cycle correction factor, the corrected margin is **4.51 dB**, thus passing FCC average limit of 53.98 dBμV/m.

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #5 Radiated Emissions: 30 MHz – 1GHz

Modulation: GFSK

Channel: Mid

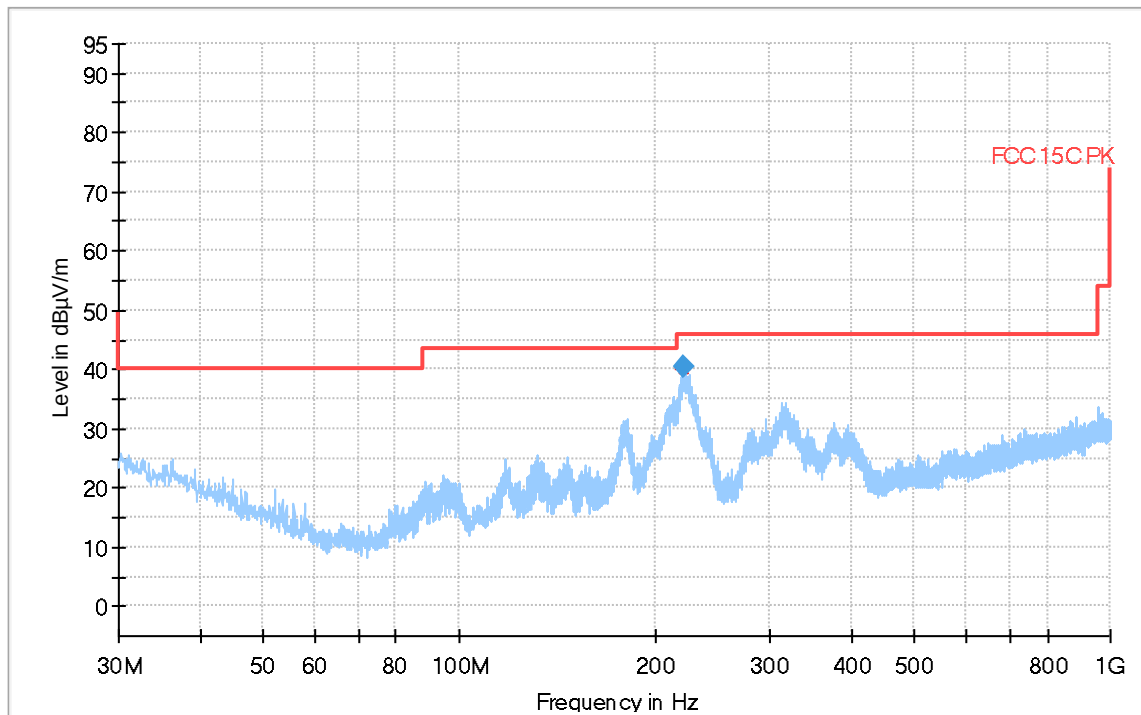
100% Test Mode Duty Cycle

Final_Result

Frequency (MHz)	MaxPeak (dBμV/m)	RMS (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
220.741	40.319	---	46.00	5.68	500.0	100.000	100.0	H	112.0	-17.9

(continuation of the "Final_Result" table from column 16 ...)

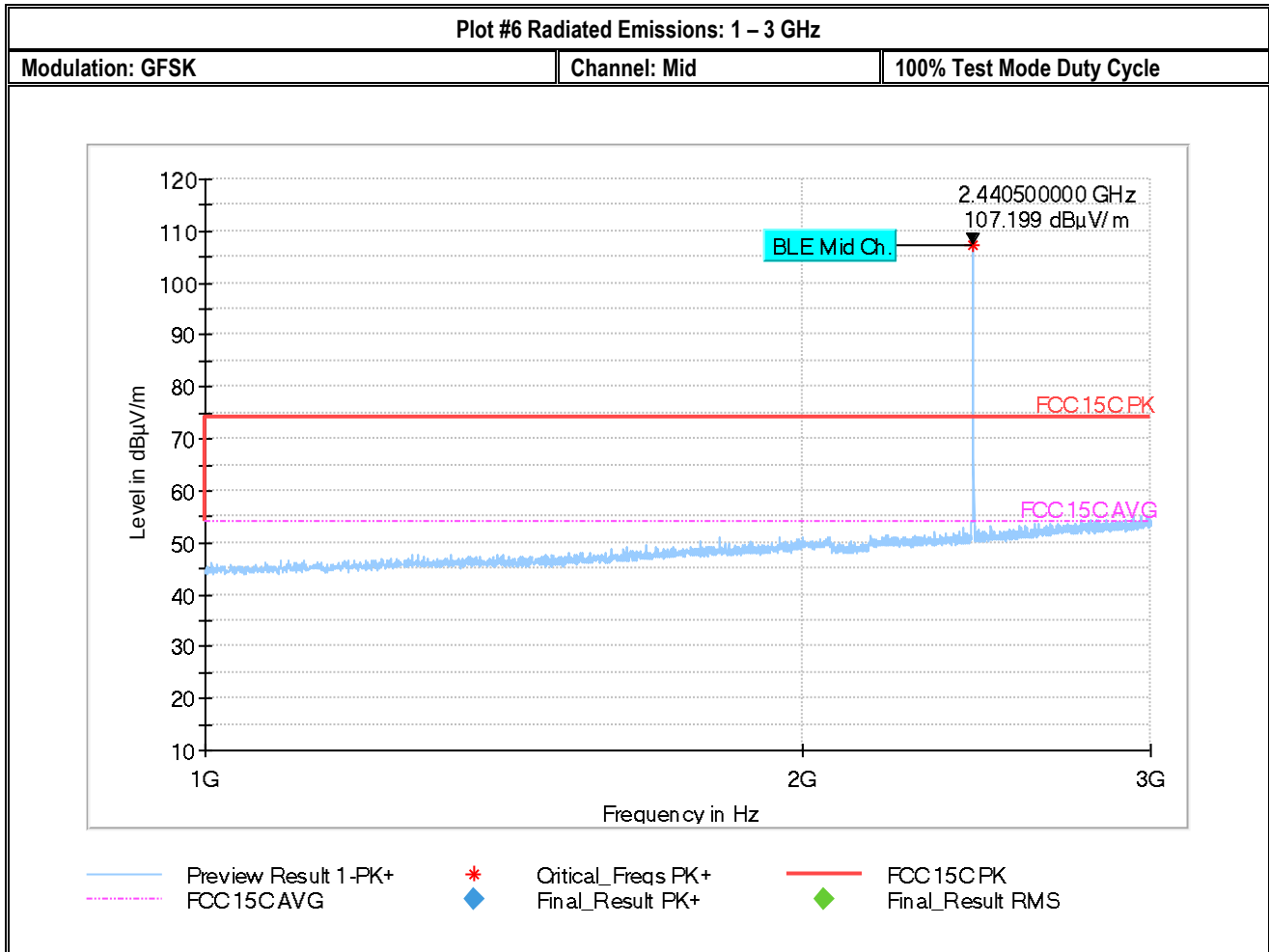
Frequency (MHz)	Comment
220.741	12:37:53 PM - 10/25/2019



◆ Preview Result 1-PK+ Final_Result PK+
 * Critical_Freqs PK+
 — FCC 15C PK
 ◆ Final_Result RMS

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #7 Radiated Emissions: 3 – 18 GHz

Modulation: GFSK

Channel: Mid

100% Test Mode Duty Cycle

Final_Result

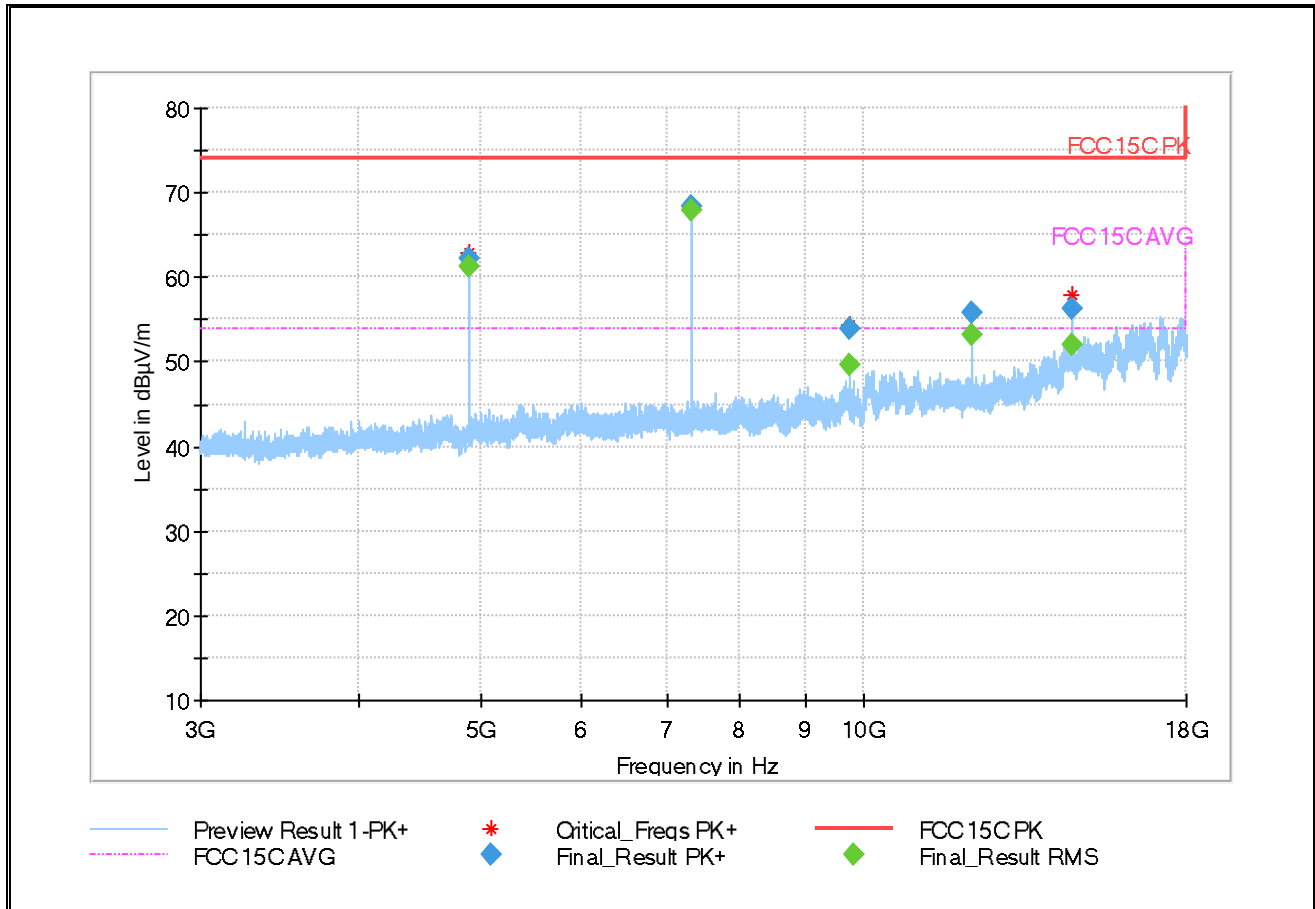
Frequency (MHz)	MaxPeak (dBμV/m)	RMS (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
4880.458	62.235	---	73.99	11.75	200.0	1000.000	145.0	H	180.0	-5.7
4880.458	---	61.183	53.98	-7.20	200.0	1000.000	145.0	H	180.0	-5.7
7320.754	68.319	---	73.99	5.67	200.0	1000.000	132.0	H	87.0	-2.7
7320.754	---	67.846	53.98	-13.87	200.0	1000.000	132.0	H	87.0	-2.7
9761.047	---	49.737	53.98	4.24	200.0	1000.000	121.0	V	81.0	2.9
9761.047	53.881	---	73.98	20.10	200.0	1000.000	121.0	V	81.0	2.9
12201.330	55.750	---	73.98	18.23	10.0	1000.000	148.0	H	137.0	4.9
12201.330	---	53.217	53.98	0.76	10.0	1000.000	148.0	H	137.0	4.9
14641.566	56.177	---	73.98	17.80	10.0	1000.000	118.0	H	104.0	10.0
14641.566	---	51.898	53.98	2.08	10.0	1000.000	118.0	H	104.0	10.0

(continuation of the "Final_Result" table from column 16 ...)

Frequency (MHz)	Comment
4880.458	2:44:26 PM - 10/23/2019
4880.458	2:44:27 PM - 10/23/2019
7320.754	2:33:34 PM - 10/23/2019
7320.754	2:33:35 PM - 10/23/2019
9761.047	2:47:59 PM - 10/23/2019
9761.047	2:47:59 PM - 10/23/2019
12201.330	2:41:07 PM - 10/23/2019
12201.330	2:41:07 PM - 10/23/2019
14641.566	2:37:46 PM - 10/23/2019
14641.566	2:37:46 PM - 10/23/2019

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

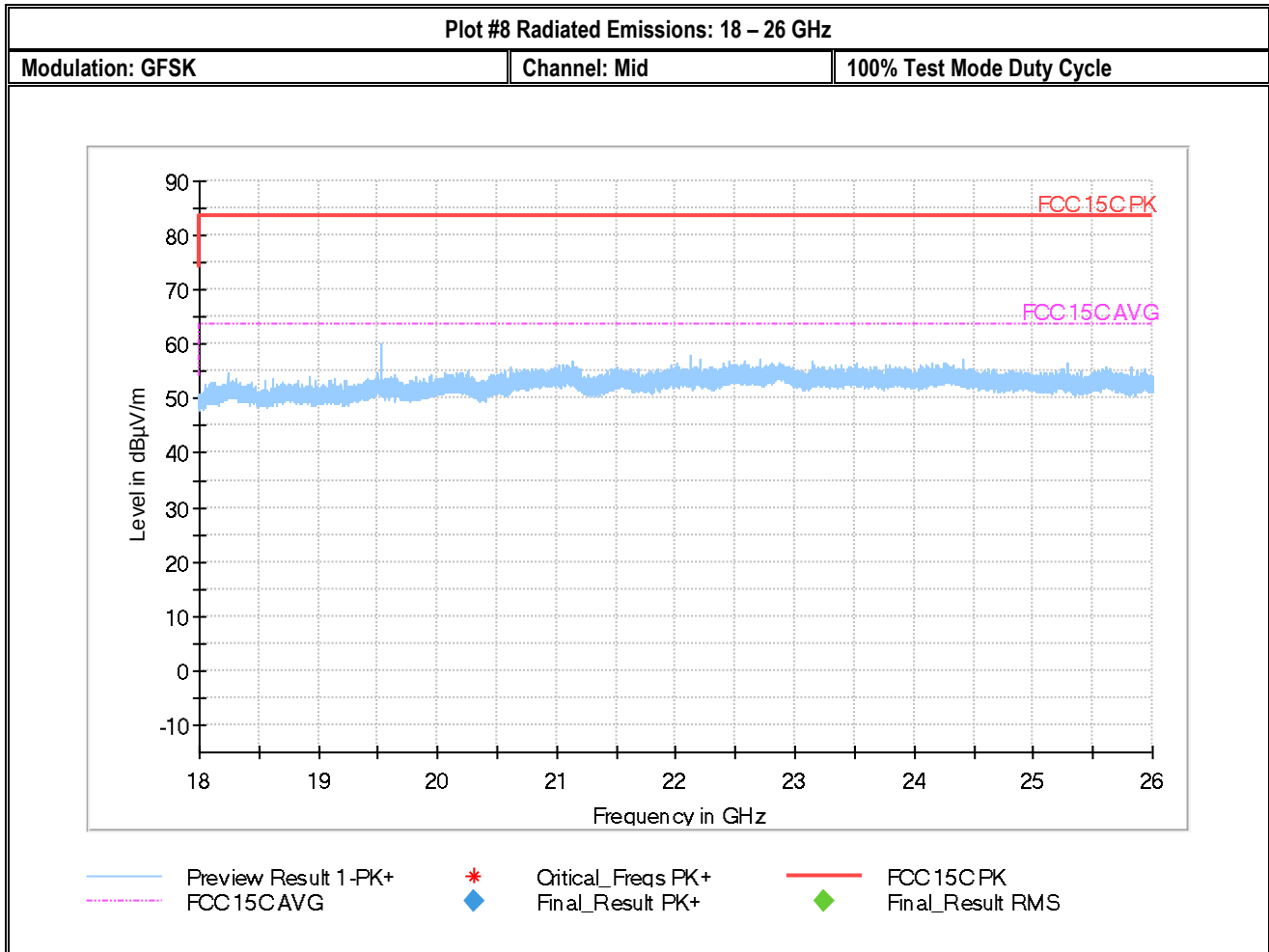
FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Note: Based on the maximum data payload/packet, maximum number of packet per interval, and minimum connection interval of BTLE 4.0, the duty cycle in normal operating mode is 12.8%. The duty cycle correction factor is calculated to be 17.86 dB and is applied to the margin. Worst case margin is at frequency 7320.754 MHz for peak measurement. By applying the duty cycle correction factor, the corrected margin is **3.52 dB**, thus passing FCC average limit of 53.98 dBμV/m.

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #9 Radiated Emissions: 30 MHz – 1GHz

Modulation: GFSK

Channel: High

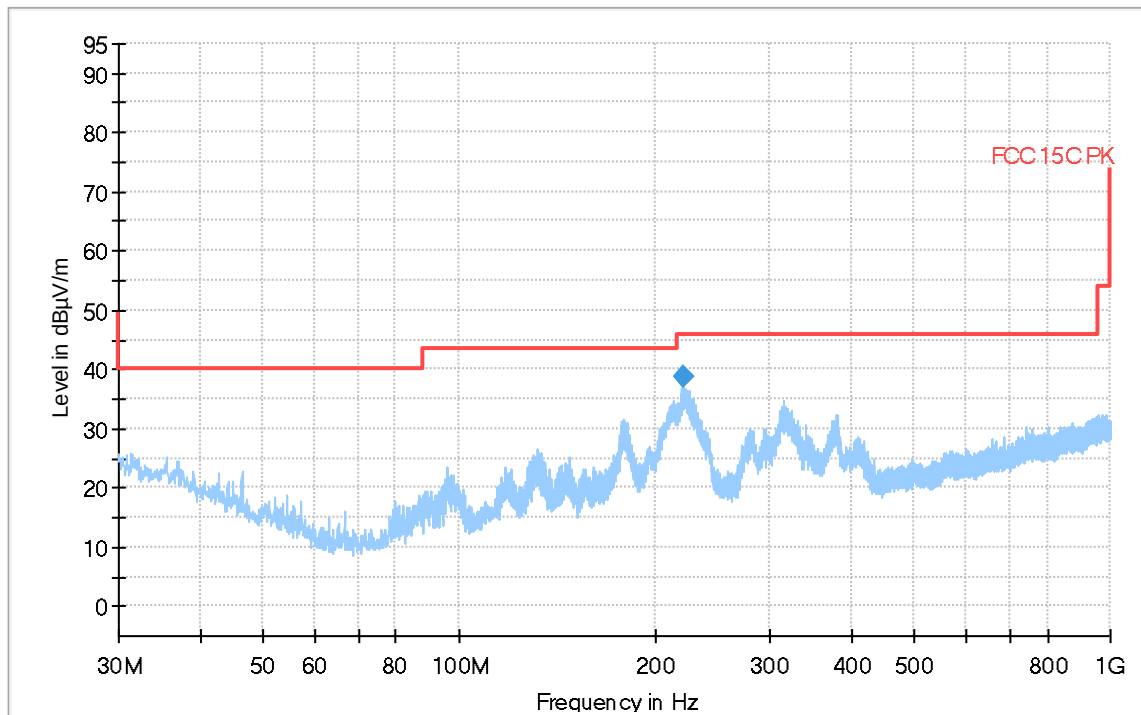
100% Test Mode Duty Cycle

Final_Result

Frequency (MHz)	MaxPeak (dBμV/m)	RMS (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
221.598	38.659	---	46.00	7.34	500.0	100.000	100.0	H	110.0	-17.8

(continuation of the "Final_Result" table from column 16 ...)

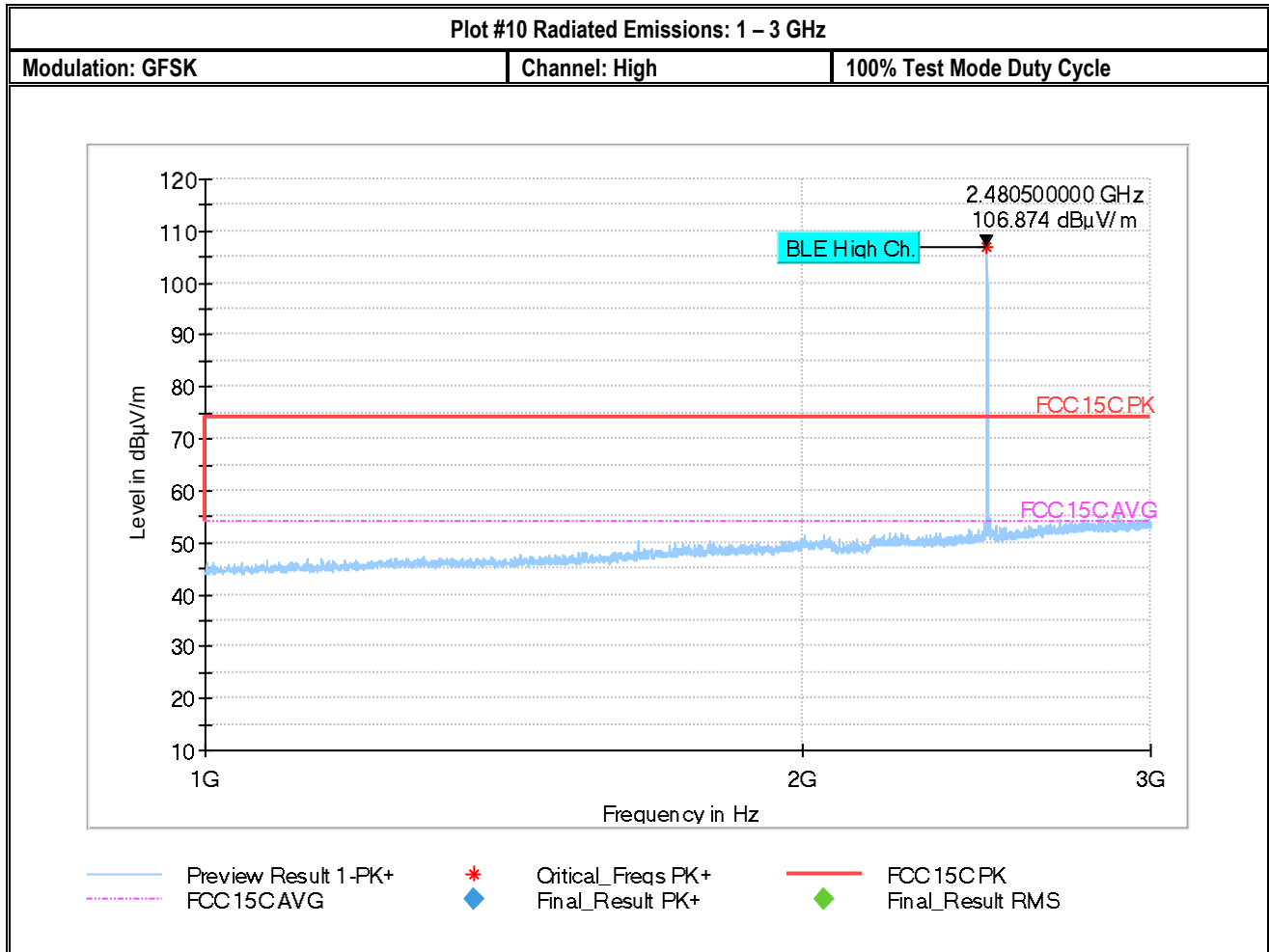
Frequency (MHz)	Comment
221.598	1:04:55 PM - 10/25/2019



◆ Preview Result 1-PK+ Final_Result PK+
 * Critical_Freqs PK+
 — FCC 15C PK
 ◆ Final_Result RMS

Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
Date of Report: 2019-11-21

FCC ID: GKM-XT4964
IC ID: 10281A-XT4964



Test Report #: EMC_XIRGO-128-19001_15.247_BTLE_DTS
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FCC ID: GKM-XT4964
IC ID: 10281A-XT4964

Plot #11 Radiated Emissions: 3 – 18 GHz

Modulation: GFSK

Channel: High

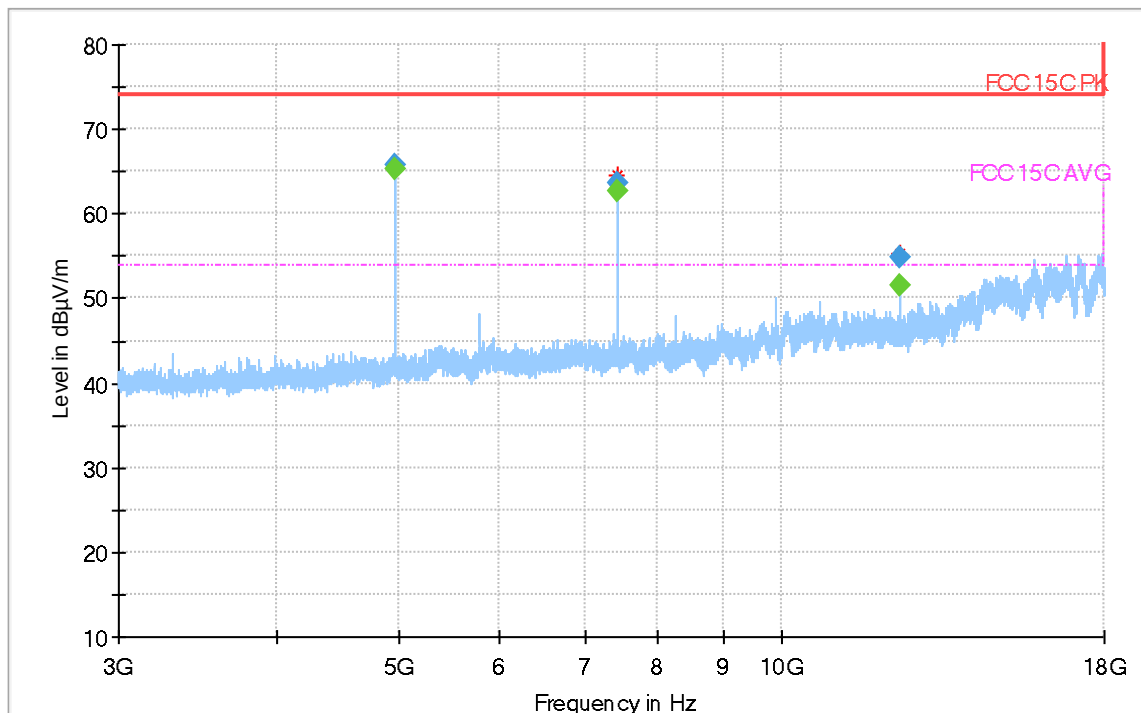
100% Test Mode Duty Cycle

Final_Result

Frequency (MHz)	MaxPeak (dBμV/m)	RMS (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
4960.521	---	65.171	53.98	-11.19	200.0	1000.000	121.0	H	184.0	-5.6
4960.521	65.725	---	73.99	8.26	200.0	1000.000	121.0	H	184.0	-5.6
7440.785	63.708	---	73.99	10.28	200.0	1000.000	121.0	H	77.0	-2.1
7440.785	---	62.793	53.98	-8.81	200.0	1000.000	121.0	H	77.0	-2.1
12401.124	54.812	---	73.98	19.17	10.0	1000.000	128.0	H	53.0	5.8
12401.124	---	51.540	53.98	2.44	10.0	1000.000	128.0	H	53.0	5.8

(continuation of the "Final_Result" table from column 16 ...)

Frequency (MHz)	Comment
4960.521	1:55:09 PM - 10/23/2019
4960.521	1:55:09 PM - 10/23/2019
7440.785	1:48:25 PM - 10/23/2019
7440.785	1:48:25 PM - 10/23/2019
12401.124	1:51:40 PM - 10/23/2019
12401.124	1:51:41 PM - 10/23/2019



Preview Result 1-PK+ * Critical_Freqs PK+ FCC 15C PK
FCC 15C AVG ◆ Final_Result PK+ ◆ Final_Result RMS

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Note: Based on the maximum data payload/packet, maximum number of packet per interval, and minimum connection interval of BTLE 4.0, the duty cycle in normal operating mode is 12.8%. The duty cycle correction factor is calculated to be 17.86 dB and is applied to the margin. Worst case margin is at frequency 4960.521 MHz for peak measurement. By applying the duty cycle correction factor, the corrected margin is **6.12 dB**, thus passing FCC average limit of 53.98 dB μ V/m.

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9 Test setup photos

Setup photos are included in supporting file name: "EMC_XIRGO-128-19001_15.247_Setup_Photos.pdf"

10 Test Equipment And Ancillaries Used For Testing

Equipment Type	Manufacturer	Model	Serial #	Calibration Cycle	Last Calibration Date
Active Loop Antenna	ETS LINDGREN	6507	00161344	3 years	10/26/2017
Biconlog Antenna	TESEO	CBL 6141B	41106	3 years	11/01/2017
Horn Antenna	EMCO	3115	00035111	3 years	04/17/2019
Horn Antenna	ETS LINDGREN	3117	00167061	3 years	08/08/2017
Signal Analyzer	R&S	FSU26	200302	3 years	07/16/2019
Signal Analyzer	R&S	FSV 40	101022	3 years	07/15/2019
Thermometer Humidity Monitor	CONTROL COMPANY	36934-164	191871994	2 years	01/10/2019
DC Power Supply	BK PRECISION	1672	1672002260611085	N/A	N/A
DC Power Supply	GW INSTRON	GPS-3030DD	EM850939	N/A	N/A

Note: Equipment used meets the measurement uncertainty requirements as required per applicable standards for 95% confidence levels. Calibration due dates, unless defined specifically, falls on the last day of the month. Items indicated "N/A" for cal status either do not specifically require calibration or is internally characterized before use.

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11 Revision History

Date	Report Name	Changes to report	Report prepared by
2019-11-21	EMC_XIRGO-128-19001_15.247_BTLE_DTS	Initial version	Chin Ming Lui