



## TEST REPORT

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**Project Number: 3036360**

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**Date(s) of Test: January 6 to 10, 2003**

**Evaluation of the  
Model number: 3101D**

**To**

**CFR 47 Part 15 Subpart F**

**For**

**Geophysical Survey Systems**

Test Performed by:  
Intertek Testing Services

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Test Authorized by:  
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**EXECUTIVE SUMMARY**

Testing performed for Geophysical Survey Systems  
Model Number: 3101D

<b>Test Description</b>	<b>FCC Rules Section</b>	<b>Results</b>	<b>Page #</b>
UWB bandwidth <960MHz GPR operated by law enforcement, etc. Eligible for licensing (Part 90) Cease operation 10 seconds after release	15.509 (a)-(c)	PASS	10
Quasi-peak emissions IAW 15.209	15.509(d)	PASS	14
RMS emissions >960MHz	15.509(d)	PASS	17
RMS emissions in GPS bands	15.509(e)	PASS	19
Emission at frequency of highest emission	15.509(f)	PASS	12
Label indicating restricted operation	15.509(g)	PASS	23
Prohibited use Unique antenna Frequency of maximum emission within UWB bandwidth Measurement frequency range	15.521	Client informed	10
Coordination with FCC and NTIA	15.525	Client informed	24

## **1. INTRODUCTION**

### **1.1. Client Information**

Geophysical Survey Systems

13 Klein Drive  
PO Box  
Salem, NH 03079

Contact: Alan Schutz  
Title: Engineering Director

### **1.2. Test Plan Reference**

47 CFR Part 15 Subpart F – Ultra-wideband operation

FCC 02-48 FCC First Report and Order Revision of Part 15 of the Commission's rules Regarding Ultra-Wideband Transmission Systems; Appendix F – Measurement Procedures; 22 April 2002

### **1.3. Equipment Under Test (EUT)**

The Equipment Under Test (EUT) is a low frequency imaging device operating as a Ground Penetrating Radar (GPR). It is designed to be operated only for ground contact. A model designated FCC was received in good condition on 12/20/02.

#### **1.3.1 System Support Equipment**

Description: Survey Controller  
Model: MF-20/1000  
Serial: 0001

#### **1.3.2 System Block Diagram**

Figure 1-1 shows a block diagram of the test setup.

#### **1.3.3 Justification**

The system was configured for testing in a typical fashion (as a customer would normally use it), and in the confines as outlined in C63.4 (1992).

Initial testing was performed to maximize emissions. The system was rotated every 45°, the antenna height was varied from 1 meter to 4 meters above the ground, and the antenna polarization was changed. The EUT azimuth of maximum emissions was recorded.

During final testing, the antenna height was varied from 1 meter to 4 meters above the ground, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data in this report. For measurements using the horn antenna, the horn was tilted to aim at the EUT. At antenna height of 1-2.5m, the horn was angled at 10° below horizontal (25° if antenna distance =1m). At antenna height of 2.5-4m, the horn was angled at 35° below horizontal (55° if antenna distance =1m).

Radiated emissions were tested in the frequency range up to at least  $f_C+3/PW$  where, for model: 3101D  
 $PW \approx 0.5ns$ ;  
 $f_C=430.28MHz$

$f_{\max}=38.65\text{MHz}$ .

**1.3.4 Mode(s) of Operation**

The EUT was configured above a sand pit of approximately 3m x 3m x 1.2m. The EUT was set to transmit continuously with its normal operational characteristics. The EUT was operated at a pulse repetition rate (PRR) of 100kHz.

**1.4. Modifications required for compliance**

No modifications were made to the EUT by Intertek Testing Services during these tests.

## 2. TEST ENVIRONMENT

### 2.1. Test facility

The test site used during testing was made in according with FCC Part 15F. The test site was constructed with a dimension of 9 ft x 9 ft x 48 inches deep. The whole area was filled with dry sand. The equipment under test (EUT) was placed directly on the sand while the receiving antenna was placed on the blacktop at a distance of 3m from the closest point of the EUT. A groundplane with a dimension of 96.0625inch X 144.250inch was placed between the EUT and receiving antenna and connected to earth ground via a ground rod.

### 2.2. Test Equipment

The following equipment was used to make measurements for emissions testing:

Description	Manufacturer	Model	Serial #	Cal Due
EMI Receiver	Hewlett Packard	8546A	3704A00331	08/19/2003
Horn Antenna	EMCO	3115	9602-4675	06/06/2003
Biconolog Antenna	EMCO	3142	9711-1223	11/05/2003
Pre-Amp	Miteq	NSP-4000-NF	507145	09/27/2003
Pre-Amp	CTT	ALM/100-5030-329	34510	04/05/2003
Pre-amp	Hewlett Packard	8447	PRE6	11/15/2003
High Frequency Cables	Huber + Suhner, Inc	Sucoflex 104PEA	CBLSHF203	04/01/2003
High Frequency Cables	Huber + Suhner, Inc.	Sucoflex 104PEA	CBLSHF103	04/01/2003
Loop Antenna	Empire Devices	LP105	905	05/04/2003

### 2.3. Sample Calculations

The following sample calculations were performed to determine compliance with the respective requirements

#### 2.3.1 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF + CF + NG - AG$$

where FS = Field Strength in dB $\mu$ V/m

RA = Receiver Amplitude (including preamplifier) in dB $\mu$ V

CF = Cable Attenuation Factor in dB

AF = Antenna Factor in dB/m

AG = Amplifier Gain in dB

NG = No Groundplane Factor in dB (0dB if ground plane is used)

In the following table(s), the reading shown on the data table reflects the preamplifier gain. An example for the calculations in the following table is as follows:

Assume a receiver reading of 52.0 dB $\mu$ V is obtained. The antenna factor of 7.4 dB, cable factor of 1.6 dB, and no groundplane factor of 4.7 dB is added. The amplifier gain of 29 dB is subtracted, giving a field strength of 36.7 dB $\mu$ V/m. This value in dB $\mu$ V/m was converted to its corresponding level in  $\mu$ V/m.

$$RA = 52.0 \text{ dB}\mu\text{V}$$

$$AF = 7.4 \text{ dB/m}$$

$$CF = 1.6 \text{ dB}$$

$$NG = 4.7 \text{ dB}$$

AG = 29.0 dB  
FS = 36.7 dBμV/m

Level in μV/m =  $[10^{(36.7 \text{ dBμV/m}/20)}] = 68.4 \text{ μV/m}$

### **2.3.2 EIRP Calculation**

In the frequency range above 960MHz, the field strength in dBμV/m measured at 1m and 3m is converted to EIRP in dBm as follows:

$$\text{dBm/m}^2 = \text{dBμV/m} - 90 - 10 \cdot \log 377$$

$$\text{dBm} = \text{dBm/m}^2 + 10 \cdot \log(4 \cdot \pi \cdot 3^2) = \text{dBμV/m} - 90 - 10 \cdot \log 377 + 10 \cdot \log(4 \cdot \pi \cdot 3^2)$$

$$\text{dBm} = \text{dBμV/m} - 95.2$$

### **2.3.3 RMS calculation**

All RMS measurements >960MHz were taken with the following spectrum analyzer settings:

RBW = 1MHz (or 1kHz in GPS band)  
VBW = 3MHz  
Detector = Sample  
Sweep time = 200 ms

At each frequency measured above 960MHz (where RMS values are specified) the spectrum analyzer was set up with the appropriate measurement bandwidth (1MHz or 1kHz) in 'zero-span' mode. The maximum signal level was captured and the waveform was downloaded to the computer. A total of 400 points were acquired at each frequency. The RMS level at the measurement frequency was calculated as follows:

$$\text{mW}_{\text{RMS}} = \sqrt{(P_1^2 + P_2^2 + \dots + P_x^2)/x} \text{ where:}$$

$\text{mW}_{\text{RMS}}$  = RMS power in a 1msec interval at measurement frequency  
x = 1 to (number of analyzer samples)  
 $P_x$  = Power at each time sample

Using this RMS power at the analyzer, EIRP at each frequency was calculated as described above.



#### **2.4. Measurement Uncertainty**

Compliance of the product is based on the measured value. However, the measurement uncertainty is included for informational purposes.

The expanded uncertainty ( $k = 2$ ) for radiated emissions from 30 to 1000 MHz has been determined to be:

±4.2 dB at 10m  
±5.5 dB at 3m

The expanded uncertainty ( $k = 2$ ) for radiated emissions from 1 to 18 GHz has been determined to be:

±4.6 dB at 3m  
±4.5 dB at 1m

The expanded uncertainty ( $k = 2$ ) for radiated emissions from 18 to 40 GHz has been determined to be:

±4.2 dB at 1m

The expanded uncertainty ( $k = 2$ ) for mains conducted emissions from 150 kHz to 30 MHz has been determined to be:

±2.6 dB

### **3. ULTRA WIDEBAND OPERATION**

#### **3.1. Operational Limitations (section 15.521)**

The EUT is subject to the following limitations related to GPR. The client has been informed of these requirements.

- a. pursuant to 15.203 and 15.204, the EUT must use a permanently attached antenna or an antenna that uses a unique connector. Additionally, no 'after-market' amplifiers or antenna modifications may be made without further demonstration of system compliance.
- b. Emissions not intended to be radiated from the transmitter's antenna must comply with section 15.209
- c. Manufacturer (or representative) is responsible for ensuring that EUT is marketed only to:
  - law enforcement
  - fire or emergency organizations
  - scientific research institutes
  - commercial mining companies
  - construction companies

#### **3.2. UWB Bandwidth (section 15.503(a))**

The UWB bandwidth is the frequency band bounded by the points that are 10 dB below the highest radiated UWB emission. The upper boundary is designated  $f_H$  and the lower boundary is designated  $f_L$ . The frequency at which the highest radiated emission occurs is designated  $f_M$ .

##### **3.2.1 Requirement (low-frequency imaging systems)**

The UWB bandwidth of low frequency imaging systems must be contained below 960MHz.

##### **3.2.2 Test Procedure**

- 1) With the EUT set up as specified in 1.3 above, set up the log periodic antenna at a distance of 3m from the EUT. Using the analyzer/receiver, measure emissions from the EUT at frequencies above 26MHz.
- 2) Maximize the emissions by rotating the EUT in 45° increments.
- 3) Maximize the emissions by varying the antenna height from 1 – 4m and changing antenna polarization.
- 4) Record all emissions from the EUT. Due to the broadband nature of the emissions, significant care must be taken to capture the true spectrum of the emission. This may require measurements with extremely narrow sweep widths.
- 5) Verify that the measured spectrum allows resolution of levels 10dB below the maximum level, both above and below the frequency of maximum emission.
- 6) If necessary, use the loop antenna to measure below 26MHz, or the horn antenna to measure above 2GHz.

##### **3.2.3 Test Results**

The model 3101D complies with the requirement. The frequency of maximum emission ( $f_M$ ) is 38.65MHz. The lower boundary frequency ( $f_L$ ) is 25.15MHz. The upper boundary frequency ( $f_H$ ) is 835.4MHz.

The following table shows the final results of measurements made in accordance with FCC Subpart 15.503 and the above procedure.

Engineer: Kouma Sinn Location: Site 2C Serial #: FCC  
 Project #: 3036360.0 Pressure: Receiver: HP 8546A  
 Date: 1/9/03 Temp: Antenna: LOG2 11-5-03 V3.ant HORN2 6-6-0  
 Standard: FCC Part 15F Humidity: PreAmp: Miteq, CTT  
 Class: B Group: Cable(s): CBLSHF201; CBLSHF  
 Limit Distance: 3 meters Test Distance: 1 or 3 meters  
 Voltage/Frequency: Frequency Range: 960-6000MHz  
 ! - value over limit \* - value that is within the margin of measurement uncertainty of +/- dB

Notes	frequency (Hz)	dBm	AF	preamp	cable loss	Result	Test distance	Date	preamp
	15200000	-7.6500E+01	39.3	2.84E+01	0.00E+00	3.19E+01	1	1/9/03	pre6
	25150000	-6.8200E+01	37.7	2.82E+01	1.00E-01	3.89E+01	1	1/9/03	pre6
	30009000	-7.7000E+01	17.4	0.00E+00	1.00E-01	4.75E+01	3	1/9/03	
	33250000	-7.6920E+01	17.4	0.00E+00	1.00E-01	4.76E+01	3	1/9/03	
	38650000	-7.4090E+01	17.4	0.00E+00	1.00E-01	5.04E+01	3	1/9/03	
	50880000	-7.2520E+01	8.9	0.00E+00	2.00E-01	4.36E+01	3	1/9/03	
	52466300	-6.9430E+01	8.9	0.00E+00	2.00E-01	4.67E+01	3	1/9/03	
	63585000	-6.7890E+01	8.8	0.00E+00	2.00E-01	4.81E+01	3	1/9/03	
	69977500	-6.8720E+01	8.8	0.00E+00	2.00E-01	4.73E+01	3	1/9/03	
	85004000	-7.4890E+01	7.5	0.00E+00	3.00E-01	3.99E+01	3	1/9/03	
	127000000	-5.3260E+01	7.1	2.25E+01	4.00E-01	3.87E+01	3	1/9/03	miteq
	165232500	-5.3180E+01	9.2	2.25E+01	6.00E-01	4.11E+01	3	1/9/03	miteq
	182250000	-5.4760E+01	8.9	2.25E+01	6.00E-01	3.92E+01	3	1/9/03	miteq
	244000000	-5.7170E+01	12	2.25E+01	1.00E+00	4.04E+01	3	1/9/03	miteq
	287500000	-5.8810E+01	14.2	2.25E+01	1.00E+00	4.09E+01	3	1/9/03	miteq
	409500000	-6.0500E+01	16.3	2.29E+01	1.20E+00	4.11E+01	3	1/9/03	ctt
	425000000	-5.9670E+01	16.6	2.29E+01	1.20E+00	4.22E+01	3	1/9/03	ctt
	435500000	-6.0450E+01	16.6	2.29E+01	1.20E+00	4.15E+01	3	1/9/03	ctt
	519500000	-5.8050E+01	18.7	2.77E+01	1.30E+00	4.13E+01	3	1/9/03	ctt
	533500000	-5.8700E+01	18.8	2.77E+01	1.30E+00	4.07E+01	3	1/9/03	ctt
	559500000	-5.9810E+01	19	2.82E+01	1.40E+00	3.94E+01	3	1/9/03	ctt
	590100000	-5.8740E+01	18.6	2.82E+01	1.40E+00	4.01E+01	3	1/9/03	ctt
	594235000	-5.8370E+01	18.6	2.82E+01	1.40E+00	4.04E+01	3	1/9/03	ctt
	629993000	-5.7430E+01	19.8	2.92E+01	1.40E+00	4.16E+01	3	1/9/03	ctt
	646875000	-5.7170E+01	19.8	2.92E+01	1.40E+00	4.18E+01	3	1/9/03	ctt
	659000000	-5.5830E+01	19.9	3.16E+01	1.70E+00	4.12E+01	3	1/9/03	ctt
	671500000	-5.5780E+01	19.9	3.16E+01	1.70E+00	4.12E+01	3	1/9/03	ctt
	700000000	-5.7320E+01	20.5	3.27E+01	1.70E+00	3.92E+01	3	1/9/03	ctt
	718430000	-5.6660E+01	20.5	3.27E+01	1.70E+00	3.98E+01	3	1/9/03	ctt
	740500000	-5.6810E+01	20.9	3.27E+01	1.70E+00	4.01E+01	3	1/9/03	ctt
	767250000	-5.6290E+01	21.1	3.18E+01	1.70E+00	4.17E+01	3	1/9/03	ctt
	791993800	-5.6900E+01	21.7	3.18E+01	1.70E+00	4.17E+01	3	1/9/03	ctt
	803250000	-5.7550E+01	21.4	3.21E+01	2.00E+00	4.08E+01	3	1/9/03	ctt
	835425000	-5.8200E+01	22.1	3.21E+01	2.00E+00	4.08E+01	3	1/9/03	ctt
	909675000	-5.9500E+01	24.3	3.35E+01	2.40E+00	3.12E+01	1	1/9/03	ctt
	974250000	-5.8800E+01	23.8	3.50E+01	2.50E+00	3.00E+01	1	1/9/03	ctt
	1.018E+09	-5.0240E+01	24.5	3.79E+01	2.50E+00	3.63E+01	1	1/9/03	ctt
	1.06E+09	-5.0540E+01	24.5	3.79E+01	2.90E+00	3.64E+01	1	1/9/03	ctt
	1.28E+09	-5.6980E+01	24.5	3.79E+01	3.30E+00	3.04E+01	1	1/9/03	ctt
	1.305E+09	-5.7470E+01	24.5	3.79E+01	3.30E+00	2.99E+01	1	1/9/03	ctt
	1.5E+09	-5.8420E+01	25.7	3.80E+01	3.80E+00	3.05E+01	1	1/9/03	ctt
	1.829E+09	-6.0200E+01	25.7	3.80E+01	4.30E+00	2.93E+01	1	1/9/03	ctt
	2.087E+09	-6.2070E+01	27.9	3.81E+01	4.60E+00	2.98E+01	1	1/9/03	ctt

**3.3. Center Frequency (section 15.503(b))**

The center frequency,  $f_C$ , of a UWB device is defined as  $(f_H + f_L)/2$ .

**3.3.1 Requirement**

The center frequency,  $f_C$ , is used to define the fractional bandwidth as well as the minimum required measurement band.

**3.3.2 Test Procedure**

The center frequency,  $f_C$ , is determined from the data obtained in 3.2 above.

**3.3.3 Test Results**

From 3.2:

$$f_L = 25.15 \text{ MHz}$$

$$f_H = 835.4 \text{ MHz}$$

$$\text{The center frequency } f_C = (835.4 + 25.15)/2 = 430.28 \text{ MHz}$$

**3.4. Fractional Bandwidth (section 15.503(c-d))**

The fractional bandwidth of a device is defined as:

$$BW_f = (f_H - f_L)/f_C$$

**3.4.1 Requirement**

A UWB transmitter is one that, at any point in time, has a fractional bandwidth equal to or greater than 0.20 or has a UWB bandwidth equal to or greater than 500 MHz, regardless of the fractional bandwidth.

**3.4.2 Test Procedure**

The fractional bandwidth is determined using the frequencies defined in 3.2 and 3.3 above.

**3.4.3 Test Results**

From 3.2 and 3.3:

$$f_L = 25.15 \text{ MHz}$$

$$f_H = 835.4 \text{ MHz}$$

$$f_C = 430.28 \text{ MHz}$$

The fractional bandwidth  $BW_f = 1.8$ . The 3101D complies with the requirement for fractional bandwidth.

**3.5. Peak Emissions 50MHz Resolution Bandwidth (Section 15.509(f))**

The peak emission as defined by this section is the emission (in EIRP) contained within a 50MHz bandwidth centered on the frequency at which the highest radiated emission occurs,  $f_M$ .

Peak radiated emission measurements shall be made using a spectrum analyzer with a 3 MHz resolution bandwidth and no less than a 3 MHz video bandwidth. The analyzer should be used in a maximum-hold trace mode. The peak power level expressed in a 3 MHz bandwidth and the frequency at which this level was measured shall be reported in the application for certification.

**3.5.1 Limit**

The peak emission in a 50MHz bandwidth centered on  $f_M$  must be limited to a maximum of 0dBm EIRP.

**3.5.2 Test Procedure**

- 1) Using the results of 3.2 above, determine the frequency of maximum emissions  $f_M$ .

- 2) With the EUT set up as specified in 1.3 above, set up the log periodic antenna at a distance of 3m from the EUT.
- 3) Using the analyzer/receiver, measure emissions from the EUT at  $f_M$ .
- 4) Place the analyzer/receiver as follows:
  - max hold
  - peak detector
  - RBW=3MHz
  - VBW=3MHz
  - Span=0
- 5) Maximize the emissions by varying the antenna height from 1 – 4m and changing antenna polarization. Maximize the emission by rotating the EUT in 45° increments.
- 6) Record the peak emissions from the EUT.

### 3.5.3 Test Results

The peak emission (using a 3MHz RBW) from the EUT at 38.65MHz is -32.3dBm EIRP.

dBm = -61.6 @3m

AF = 17.4 dB

Bandwidth correction factor (BW)=  $20 \cdot \log(50/3) = 24.4$

Preamp factor (PF)= 0

Cable factor (CF)=0

$$\begin{aligned} \text{EIRP(3MHz)} &= \text{dBm} + \text{AF} - \text{PF} + \text{CF} + 107 - 95.2 \\ &= -61.6 + 17.4 - 0 + 0 + 11.8 \\ &= -32.3\text{dBm @ RBW=3MHz} \end{aligned}$$

Peak limit at RBW=3MHz (per 15.521(g)) =  $0\text{dBm} + 20 \cdot \log(3/50) = -24.4\text{dBm EIRP}$

Margin at  $f=38.65\text{ MHz}$  is  $(-32.3) - (-24.4) = -7.9\text{dB}$

## 4. RADIATED EMISSIONS

### 4.1. Section 5.209(d) Quasi-Peak

#### 4.1.1 Limit

The emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field Strength (V/m)	Field Strength (dBV/m)	Measurement distance (m)
0.009 - 0.490	2400/f(kHz)	67.6-20*log(f(kHz))	300
0.490 - 1.705	24000/f(kHz)	87.6-20*log(f(kHz))	30
1.705 - 30.0	30	29.5	30
30 – 88	100	40	3
88 – 216	150	43.5	3
216 – 960	200	46	3

- (a) In the emission table above, the tighter limit applies at the band edges.
- (b) The level of any unwanted emissions from an intentional radiator shall not exceed the level of the fundamental emission.
- (c) The limits in this table are based on the frequency of the unwanted emission and not the fundamental frequency.

#### 4.1.2 Test Procedure

Procedures for measurement in the frequency range of below 960 MHz are those used to show compliance with FCC Section 15.209.

- 1) Set the antenna to the measurement distance specified in the applicable standard.
- 2) With the analyzer bandwidth set to 120kHz, monitor the frequency range <960 MHz using a peak detector mode. It is recommended to demodulate the received signals for convenient discrimination of ambient emissions from those emanating from the EUT.
- 3) Upon detection of a suspect signal note its amplitude and frequency.
- 4) Manipulate EUT system cables to maximize emission levels. At each measurement frequency, maximize the emission by rotating the EUT in 45° increments.
- 5) Move the antenna over the range 1m – 4m to maximize the suspected highest amplitude observation and proceed.
- 6) Change the polarity of the antenna and repeat steps (2) and (3). Compare the resulting suspected highest amplitude signal with that found for the other polarity. Select and note the higher of the two signals. This signal is termed the highest observed signal with respect to the limit for this EUT operational mode.
- 7) The effects of various modes of operation shall be examined. Examine all possible operating modes and, if possible, vary the modes while steps (2) – (6) are being performed.
- 8) After completing steps (2) through (7), record the final EUT configuration, mode of operation, and cable configuration to use for the remaining radiated emission test.
- 9) Verify that all components of the measurement system (antenna, cables, and analyzer) have valid calibration tags and are within the prescribed calibration interval. If an out-of-calibration condition exists, notify the supervisor. Verify that the site is clear of reflecting objects.
- 10) Check the calibration of the analyzer, using either its internal calibration signal or an external source.
- 11) With the resolution bandwidth set to 120kHz and using peak detector mode, set the span of analyzer to that consistent with resolving individual emissions.
- 12) Re-maximize emissions from the EUT (rotating the EUT in 45° increments) at the worst-case combinations of frequency, antenna height and polarization. Use small variations in placement consistent with the applicable standard.

- 13) Increment the span of the analyzer such that the EUT spectrum <960MHz is measured. At the worst-case combinations of EUT operating mode, azimuth, frequency and antenna height and polarization, record the field strength measurements using the Peak detector mode. At least 6 emissions that are within 20dB of the applicable limit shall be recorded. (This method applies to emissions that are not intended to be radiated from the transmitter's antenna. Any emissions that are intended to be transmitted via the antenna are instead measured using the procedures of section 4.2 and 4.3 herein.) At each of these frequencies, record the final field strength measured using a Quasi-Peak detector. Record the values of the parameters listed in this paragraph.
- 14) Verify that all emissions recorded in step (13) comply with the limits shown in Section 4.1.1.
- 15) Document the final emissions configuration of the EUT, using either photographs or diagrams.

#### **4.1.3 Test Results**

The following table shows the final results of measurements made in accordance with FCC Subpart 15.209 and the above procedure. No signals detected <30MHz.

Company: Geophysical Survey Systems Inc	Model #: 3101D
Engineer: Kouma Sinn	Location: Site 2C
Project #: 3036360.0	Pressure:
Date: 1/13/03	Temp:
Standard: FCC Part 15F	Humidity:
Class: B	Group:
Limit Distance: 3 meters	Test Distance: 1 or 3 meters
Voltage/Frequency:	Frequency Range:
! - value over limit * - value that is within the margin of measurement uncertainty of +/-4 dB	

Notes #	Ant. Pol. (V/H)	Frequency MHz	Reading dB(uV)	Antenna Factor	Cable Loss dB	Pre-amp Factor dB	Distance Factor dB	Net dBuV/m	Limit dBuV/m	Margin dB	test distance
	V	30.000	10.9	17.4	0.1	0.0	0.0	28.4	40.0	-11.6	3
	V	30.645	11.6	17.4	0.1	0.0	0.0	29.1	40.0	-10.9	3
	V	37.400	13.5	17.4	0.1	0.0	0.0	31.0	40.0	-9.0	3
	V	46.700	19.7	11.8	0.2	0.0	0.0	31.7	40.0	-8.3	3
	V	57.980	18.5	8.9	0.2	0.0	0.0	27.6	40.0	-12.4	3
	V	58.290	19.3	8.9	0.2	0.0	0.0	28.4	40.0	-11.6	3
	V	58.770	19.3	8.9	0.2	0.0	0.0	28.4	40.0	-11.6	3
	V	62.800	18.4	8.8	0.2	0.0	0.0	27.4	40.0	-12.6	3
	V	53.200	19.1	8.9	0.2	0.0	0.0	28.2	40.0	-11.8	3
	V	150.000	30.5	8.4	0.6	22.5	0.0	17.0	43.5	-26.5	miteq 3
	V	153.225	31.3	8.4	0.6	22.5	0.0	17.8	43.5	-25.7	miteq 3
	V	155.850	30.9	8.4	0.6	22.5	0.0	17.4	43.5	-26.1	miteq 3
	V	160.950	32.8	9.2	0.6	22.5	0.0	20.1	43.5	-23.4	miteq 3
	V	164.500	34.6	9.2	0.6	22.5	0.0	21.9	43.5	-21.6	miteq 3
	V	183.250	33.9	8.9	0.6	22.5	0.0	20.9	43.5	-22.7	miteq 3
	V	200.250	30.5	10.8	1.0	22.5	0.0	19.9	43.5	-23.6	miteq 3
	V	267.000	24.8	13.1	1.0	22.5	0.0	16.4	46.0	-29.6	miteq 3
	V	283.600	27.2	14.2	1.0	22.5	0.0	19.9	46.0	-26.1	miteq 3
	V	318.000	21.5	14.9	1.1	22.4	0.0	15.0	46.0	-31.0	miteq 3
	V	375.000	19.4	16.1	1.1	22.4	0.0	14.1	46.0	-31.9	miteq 3
	V	400.000	23.9	16.3	1.2	22.9	0.0	18.5	46.0	-27.6	ctt 3
	V	433.750	27.0	16.6	1.2	22.9	0.0	21.9	46.0	-24.1	ctt 3
	V	409.250	25.5	16.3	1.2	22.9	0.0	20.1	46.0	-25.9	ctt 3
	V	493.000	26.2	18.2	1.2	24.5	0.0	21.1	46.0	-24.9	ctt 3
	V	557.425	27.1	19.0	1.4	28.2	0.0	19.3	46.0	-26.7	ctt 3
	V	606.713	27.9	19.4	1.4	29.2	0.0	19.5	46.0	-26.5	ctt 3
	V	659.500	29.6	19.9	1.7	31.6	0.0	19.6	46.0	-26.4	ctt 3
	V	700.000	28.4	20.5	1.7	32.7	0.0	17.9	46.0	-28.1	ctt 3
	V	736.000	30.3	20.9	1.7	32.7	0.0	20.2	46.0	-25.8	ctt 3
	V	751.398	30.5	21.1	1.7	31.8	0.0	21.5	46.0	-24.5	ctt 3
	V	817.750	30.1	21.4	2.0	32.1	0.0	21.4	46.0	-24.6	ctt 3
	V	911.500	30.1	24.3	2.4	33.5	0.0	23.3	46.0	-22.7	ctt 3
	V	985.750	30.1	23.8	2.5	35.0	0.0	21.4	46.0	-24.6	ctt 3
	V	1000.000	31.8	24.5	2.5	37.9	9.5	11.3	46.0	-34.7	ctt 1
	V	1047.500	44.1	24.5	2.5	37.9	9.5	23.7	46.0	-22.3	ctt 1
	V	1237.500	39.1	24.5	3.1	37.9	9.5	19.3	46.0	-26.7	ctt 1
	V	1462.500	34.4	24.5	3.7	37.9	9.5	15.2	46.0	-30.8	ctt 1



#### 4.2. Section 15.509(d) RMS >960MHz

##### 4.2.1 Limit

The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz. RMS average field strength measurements, required for all frequencies above 960 MHz, shall be made using techniques to obtain true RMS average.

Frequency MHz	EIRP dBm
960-1610	-65.3
1610-1990	-53.3
Above 1990	-51.3

##### 4.2.2 Test Procedure

- 1) Set up the EUT above the sand at a height typical of normal installation. Record the height.
- 2) Operate the EUT in a continuous mode during all tests. (e.g. – If the EUT uses a gated transmitter, configure it such that the transmitter is gated on continuously).
- 3) Set up the log-periodic antenna in horizontal polarization at a distance of 3m from the EUT.
- 4) Rotate the EUT 45°. Set the analyzer to max hold and adjust the height of the measuring antenna from 1-4m and vary the polarization. Record the maximum level and the angle of rotation if it is higher than the level measured in the previous step. Continue to rotate the EUT in 45° increments until the maximum orientation is determined.
- 5) Set up the analyzer as follows:
  - RBW=1MHz
  - VBW=3MHz
  - Detector=SAMPLE
  - Sweep=200ms
  - Frequency=960MHz
- 6) Refer to document UWB\_Work\_instruction.doc for details on software use.
- 7) Operate the analyzer in a mode and frequency range that allows discrimination of signal from the EUT vs. ambient. Record the exact frequency and set it to the center frequency.
- 8) Set the analyzer to zero-span. Using single sweep, trigger the sweep until the display contains at least 10 pulses of the EUT transmitter.
- 9) Maximize the emission by rotating the EUT in 45° increments.
- 10) Acquire and save the data from the analyzer using the procedure in UWB\_Work\_instruction.doc.
- 11) Repeat 8) through 10) at 970MHz, 980MHz, 990MHz, 1000MHz.
- 12) Replace the log-periodic antenna with the EMCO 3115 horn antenna.
- 13) Rotate the antenna to an inclination of –10°.
- 14) Determine the five frequencies ( $f_1 - f_5$ ) of maximum radiation above 960MHz using the results of 3.2 above. If there are no clear peaks above 1000MHz, use the frequencies in the following table:

$f_1$	1028MHz
$f_2$	1114MHz
$f_3$	1260MHz
$f_4$	1410MHz
$f_5$	1580MHz
$f_6$	2000MHz
$f_7$	2500MHz

- 15) Set the analyzer frequency to  $f_1$ . Operate the analyzer in a mode and frequency range that allows discrimination of signal from the EUT vs. ambient. Record the exact frequency and set it to the center frequency.
- 16) Set the analyzer to max hold and adjust the height of the measuring antenna from 1-2.5m and vary the polarization. Maximize the emission by rotating the EUT in  $45^\circ$  increments. Record the maximum level.
- 17) Rotate the antenna to an inclination of  $-35^\circ$  and adjust the height of the measuring antenna from 2.5-4m and vary the polarization.
- 18) Set the antenna height & orientation to the maximum determined in 16) and/or 17) above.
- 19) Set the analyzer to zero-span.
- 20) Maximize the emission by rotating the EUT in  $45^\circ$  increments.
- 21) Acquire and save the data using the procedure in UWB\_Work\_instruction.doc.
- 22) Repeat 15) through 21) at  $f_2$  through  $f_5$  and in 1MHz bands around each.
- 23) Using the detailed procedure in UWB\_Work\_instruction.doc, record the data points to determine the RMS levels as described in 2.2.3 above.

### 4.2.3 Test Results

Raw data for each frequency point consists of hundreds of samples. Tables of raw data are not presented here. An explanation of calculations is contained in 2.2.3 above. A table of final data follows:

Company:	Geophysical Survey Systems Inc		Model #:	3101D	
Engineer:	Kourma Sinn	Location:	Site 2C	Serial #:	LF
Project #:	3036360.0	Pressure:	Receiver: HP 8546A		
Date:	1/9/03	Temp:	LOG2 11-5-03 V3.ant		
Standard:	FCC Part 15F	Humidity:	Antenna: HORN2 6-6-03 V1m.ant		
Class:	Group:	PreAmp: Miteq, CTT			
Limit Distance:	3	meters	Cable(s): CBLSHF201; CBLSHF203		
Voltage/Frequency:			Test Distance:	1 or 3 meters	
		Frequency Range:			
! - value over limit * - value that is within the margin of measurement uncertainty of +/- 4 dB					

values of the limit		values that do not limit the margin of measurement uncertainty of WPA2								
f(MHz)	mW RMS	dBm RMS	AF	preamp	cable loss	test distance	result (dBuV/m)	result (dBmEIRP)	limit	margin
960.85	1.25E-08	-79.04	23.80	35.00	2.50	3.00	19.26	-75.94	-65.30	-10.64
970	4.47E-08	-73.50	23.80	35.00	2.50	3.00	24.80	-70.40	-65.30	-5.10
980	3.55E-08	-74.50	23.80	35.00	2.50	3.00	23.80	-71.40	-65.30	-6.10
990	2.63E-08	-75.80	23.80	35.00	2.50	3.00	22.50	-72.70	-65.30	-7.40
1004.3	1.89E-07	-67.22	24.50	37.90	2.50	1.00	19.33	-75.87	-65.30	-10.57
1195	1.53E-07	-68.16	24.50	37.90	2.90	1.00	18.80	-76.40	-65.30	-11.10
1445	3.58E-08	-74.46	24.50	37.90	3.30	1.00	12.90	-82.30	-65.30	-17.00
1776.9	5.58E-09	-82.53	25.70	38.00	4.30	1.00	6.92	-88.28	-53.30	-34.98
1847.4	6.23E-09	-82.05	25.70	38.00	4.30	1.00	7.40	-87.80	-53.30	-34.50
2041.4	4.68E-09	-83.30	27.90	38.10	4.90	1.00	8.86	-86.34	-51.30	-35.04
2200	1.46E-09	-88.35	27.90	38.10	5.20	1.00	4.11	-91.09	-51.30	-39.79
2500	1.58E-09	-88.01	28.80	37.90	5.30	1.00	5.65	-89.55	-51.30	-38.25
3000	8.2E-10	-90.86	30.50	37.80	5.90	1.00	5.20	-90.00	-51.30	-38.70
3500	3.03E-10	-95.19	31.80	38.10	6.30	1.00	2.27	-92.93	-51.30	-41.63

A plot of the final data is shown in Figure 4.2-1.

#### 4.3. Section 15.5509(e) RMS GPS bands

##### 4.3.1 Limit

The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1kHz. RMS average field strength measurements, required for all frequencies above 960 MHz, shall be made using techniques to obtain true RMS average.

Frequency MHz	EIRP dBm
1164 – 1240	-75.3
1559 - 1610	-75.3

##### 4.3.2 Test Procedure

- 1) Set up the EUT above the sand at a height typical of normal installation. Record the height.
- 2) Operate the EUT in a continuous mode during all tests. (e.g. – If the EUT uses a gated transmitter, configure it such that the transmitter is gated on continuously).
- 3) Set up the analyzer as follows:
  - RBW=1kHz
  - VBW=3MHz
  - Detector=SAMPLE
  - Sweep=200ms
  - Frequency=1164MHz
- 4) Set up the horn antenna in horizontal at a distance of 3m from the EUT. Rotate the antenna to an inclination of  $-10^{\circ}$ . Set the analyzer to max hold and adjust the height of the measuring antenna from 1-2.5m and vary the polarization. Record the maximum level.
- 5) Rotate the EUT  $45^{\circ}$ . Set the analyzer to max hold and adjust the height of the measuring antenna from 1-4m and vary the polarization. Record the maximum level and the angle of rotation if it is higher than the level measured in the previous step. Continue to rotate the EUT in  $45^{\circ}$  increments until the maximum orientation is determined.
- 6) Rotate the antenna to an inclination of  $-35^{\circ}$  and adjust the height of the measuring antenna from 2.5-4m and vary the polarization. Record the maximum level.
- 7) Maximize the emission by rotating the EUT in  $45^{\circ}$  increments
- 8) Operate the analyzer in a mode and frequency range that allows discrimination of signal from the EUT. Record the exact frequency and set it to the center frequency.
- 9) Refer to ITS document UWB\_Work\_instruction.doc for details on software use.
- 10) Set the analyzer to zero-span. Using single sweep, trigger the sweep until the display contains at least 10 pulses of the EUT transmitter.
- 11) Maximize the emission by rotating the EUT in  $45^{\circ}$  increments.
- 12) Acquire the data from the analyzer and save, using procedure in UWB\_Work\_instruction.doc
- 13) Repeat 4) through 12) at the following frequencies:

Frequency (MHz)
1.179E+09
1.194E+09
1.209E+09
1.224E+09
1.240E+09

1.559E+09
1.569E+09
1.579E+09
1.589E+09
1.599E+09
1.610E+09

#### 4.3.3 Test Results

Raw data for each frequency point consists of hundreds of samples. Tables of raw data are not presented here. An explanation of calculations is contained in 2.2.3 above. A table of final data follows:

Company: Geophysical Survey Systems Inc Model #: 3101D  
 Engineer: Kouma Sinn Location: Site 2C Serial #: FCC  
 Project #: 3036360 Pressure: Receiver: HP 8546A  
 Date: 1/10/03 Temp: Antenna: HORN2 6-6-03 V1m.a  
 Standard: FCC Part 15F Humidity: PreAmp: Miteq, CTT  
 Class: B Group: Cable(s): CBLSHF201; CBLSHF203  
 Limit Distance: 3 meters Test Distance: 1 meters  
 Voltage/Frequency: Frequency Range:  
 ! - value over limit \* - value that is within the margin of measurement uncertainty of +/- 4 dB

f(MHz)	mWRMS	dBm	AF	preamp	cable loss	test distance	result (dBuV/m)	result (dBm EIRP)	limit	LF	margin
1160	2.4E-10	-96.20	24.50	37.90	2.90	1	-9.24	-104.44	#N/A	#N/A	
1180	5.72E-11	-102.42	24.50	37.90	2.90	1	-15.47	-110.67	-75.30	-35.37	
1190	5.69E-11	-102.45	24.50	37.90	2.90	1	-15.49	-110.69	-75.30	-35.39	
1210	5.44E-11	-102.64	24.50	37.90	3.10	1	-15.49	-110.69	-75.30	-35.39	
1220	5.18E-11	-102.86	24.50	37.90	3.10	1	-15.70	-110.90	-75.30	-35.60	
1560	1.57E-10	-98.05	25.70	38.00	3.80	1	-9.10	-104.30	-75.30	-29.00	
1570	5.12E-11	-102.90	25.70	38.00	3.80	1	-13.95	-109.15	-75.30	-33.85	
1580	5.6E-11	-102.52	25.70	38.00	3.80	1	-13.56	-108.76	-75.30	-33.46	
1590	5.97E-11	-102.24	25.70	38.00	3.80	1	-13.28	-108.48	-75.30	-33.18	
1600	6.63E-11	-101.79	25.70	38.00	3.90	1	-12.73	-107.93	-75.30	-32.63	
1610	5.77E-11	-102.39	25.70	38.00	3.90	1	-13.33	-108.53	-75.30	-33.23	

A plot of the final data is shown in Figure 4.3-1.

#### 4.4. Test Setup Photographs

Photographs of the test setup are submitted as a separate exhibit with the filename 3101D setup.doc

## 5. AC MAINS CONDUCTED EMISSIONS

### 5.1.1 Limit

The following table shows the line-conducted emission limits for FCC Part 15 Subpart B Section 15.207 and CISPR 22 Amend 1- 2002:

Frequency (MHz)	Conducted Limit dBmV	
	QP	Ave
0.15 – 0.5	66 to 56	56 to 46
0.5 – 5	56	46
5 to 30	60	50

### 5.1.2 Test Procedure

- 1) All conducted voltage measurements shall be made on each current-carrying conductor at the plug end of the EUT power cord or calibrated extension by the use of mating plugs and receptacles on the EUT and LISN/AMN if used. Equipment shall be tested with power cords that are normally used or that have electrical and shielding characteristics that are the same as those cords normally used. For those measurements using a LISN/AMN, the 50  $\Omega$  measuring port is terminated by a 50  $\Omega$  receiver or a 50  $\Omega$  resistive load. Hence all 50  $\Omega$  measuring ports of the LISN/AMN are terminated by 50  $\Omega$ . **CAUTION: Observe safety precautions appropriate to hazardous mains or power line voltages, such as de-energizing circuits and tagging/lockout procedures.**
- 2) The EUT shall be placed 40 cm from the vertical ground plane 40 cm away from the rear of the EUT.
- 3) The EUT should be set up in its typical configuration
- 4) Each EUT current-carrying power lead, except the ground (safety) lead, shall be individually connected through a LISN/AMN to the input power source. **Note especially the supply of the appropriate power voltage and frequency.** All unused 50  $\Omega$  connectors of the LISN/AMN shall be resistively terminated when not connected to the measuring instrument. When the test configuration comprises multiple units that have their own individual power cords, AC power line conducted emissions measurements shall be performed with the line cord of the EUT connected to one LISN/AMN that is connected to the receiver. Those power cords for the units in the remainder of the configuration not under measurement shall be connected to a multiple outlet, which in turn shall be connected to a LISN/AMN different from the LISN/AMN used for the power cord of the EUT. Adapters connected between the EUT power cord plug and the LISN/AMN power socket shall be less than 20cm long and contain only one plug and one outlet.
- 5) The excess length of the lead between the EUT and the LISN/AMN receptacle (or mains outlet where a LISN/AMN cannot be used) shall be folded back and forth at the center of the lead to form a bundle not exceeding 40cm in length. If the EUT does not have a flexible power lead, it shall be placed at a distance of 80cm from the LISN/AMN (or mains outlet where a LISN/AMN cannot be used) and connected to it by a lead or appropriate connection no longer than 1m. Measurements shall be made at the LISN/AMN end of this lead or connection.
- 6) The LISN/AMN housing, receiver case ground, conducting ground plane and vertical conducting surface (if any) shall be bonded together. Care shall be taken to assure an adequate RF bonding of the LISN/AMN to the conducting ground plane.
- 7) Set the receiver bandwidth to the correct value for the measurement frequency range and monitor the entire frequency range for which a limit is specified (or a subset) using a peak detector mode.
- 8) For each mode of operation of the EUT and for each current-carrying conductor, manipulate the system cables or wires to produce the highest amplitude signal relative to the limit. Record the final EUT configuration, mode of operation, cable configuration and current-carrying conductor that produced the highest emissions relative to the test limit.
- 9) Based on the preliminary scan of the EUT, select the one EUT and cable or wire configuration and mode of operation that produced the emission with the highest amplitude relative to the applicable

limit. If the EUT is relocated from a preliminary test site to a final test site, the highest emissions shall be re-maximized at the final test location, by cable manipulation within the constraints of the applicable standard. If no preliminary scan was performed, the worst-case configuration must be determined during the course of the final scan.

- 10) Set the receiver to quasi-peak detector mode. Set the span of the receiver to the maximum consistent with resolving individual emissions. Record the six highest emissions relative to the limit for all the current-carrying conductors of the power cords that comprise the EUT, over the frequency range specified in the relevant standard.
- 11) Document the final emissions configuration of the EUT, using either photographs and/or diagrams.

### 5.1.3 Test Results

The EUT is powered by remote controller and does not derive power directly from the mains. The controller, when connected to a m/n 3101D antenna complies with the requirements of CISPR 22 Amend 1-2002 and 15.207. The EUT complies with the average limit when measured with a quasi-peak detector.

### Conducted Emissions / Interference

Company: Geophysical Survey Systems, Inc.

Model: SIR-20

Serial: 34

Project: 3021297

Date: 03/05/02

Standard: FCC15.207

Class:

Group: None

Notes: The SIR-20 was tested while connected to a m/n3101D (s/n 1484) GPR antenna

System Loss: Includes the Cable and LISN loss.

Tested by: Kouma Sinn

Location: Site 1C

Temp/Humidity: 16.7C/L%

Detector: HP 8546A

System Loss: LISN Calibration + 10 meter RG58

Supply Voltage: 120VAC/60Hz

REC1 01/09/03, CBL10MS1 08/24/02, DS28 08/14/02, LISN10 9252-5--R-24-BNC, 94172 05/02

Frequency MHz	Reading Side A dB(uV)	Reading Side B dB(uV)	Attenuator Factor dB	System Loss dB	Quasi-Peak			Average	
					Net dB(uV)	Limit dB(uV)	Margin dB	Limit dB(uV)	Margin dB
0.489	17.4	16.5	20.0	2.0	39.4	56.2	-16.8	46.2	-6.8
0.623	18.7	18.9	20.0	2.0	40.9	56.0	-15.1	46.0	-5.1
7.018	11.9	10.8	20.0	2.0	33.9	60.0	-26.1	50.0	-16.1
23.850	11.6	12.3	20.0	2.0	34.3	60.0	-25.7	50.0	-15.7
27.320	16.0	15.7	20.0	2.0	38.0	60.0	-22.0	50.0	-12.0
29.970	16.4	16.4	20.0	2.0	38.4	60.0	-21.6	50.0	-11.6

## **6. LABELING AND INSTRUCTION MANUAL**

Prior to marketing, the EUT shall be labeled in accordance with 15.19. In addition to the application of the FCC ID, the following statement shall be permanently affixed in a conspicuous location:

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

In addition, the following statement shall be permanently affixed in a conspicuous location:

Operation of this device is restricted to law enforcement, fire and rescue officials, scientific research institutes, commercial mining companies, and construction companies. Operation by any other party is a violation of 47 U.S.C. § 301 and could subject the operator to serious legal penalties.

**7. OPERATING COORDINATION (15.525)**

GSSI shall inform the users of UWB devices that they are required to provide usage information to the National Telecommunication and Information Administration, including company contact information and proposed geographical area of operation. Further details of the submittals are found in 47 CFR subsection 15.525.



**8. EQUIPMENT LIST**

<b>Description</b>	<b>Frequency range</b>	<b>Model</b>	<b>Serial number</b>	<b>Calibration due</b>
Preamp	10kHz – 1MHz	HP8447D	1937A03354	11/14/2003
Preamp	400MHz – 1GHz	Miteq NSP4000-NF	507145	9/27/2003
Preamp	1GHz – 18GHz	CTT ALM/100-5030-329	34510	4/5/2003
Antenna	10kHz – 30MHz	EMPIRE DEVICES LP-105	905	5/4/2003
Antenna	30MHz – 1GHz	EMCO 3142	9711-1223	11/5/2003
Antenna	1GHz – 18GHz	EMCO 3115	9602-4675	6/6/2003
Spectrum Analyzer	9kHz-6GHz	HP 8546A	3850A00362	8/19/03
SA filter section	9kHz-6GHz	HP 85460A	3704A00331	8/19/03
Cable	<18GHz	Sucoflex (Huber Suhner) 104PE	CBLSHF201	4/1/2003
Cable	<18GHz	Sucoflex (Huber Suhner) 104PE	CBLSHF203	4/1/2003

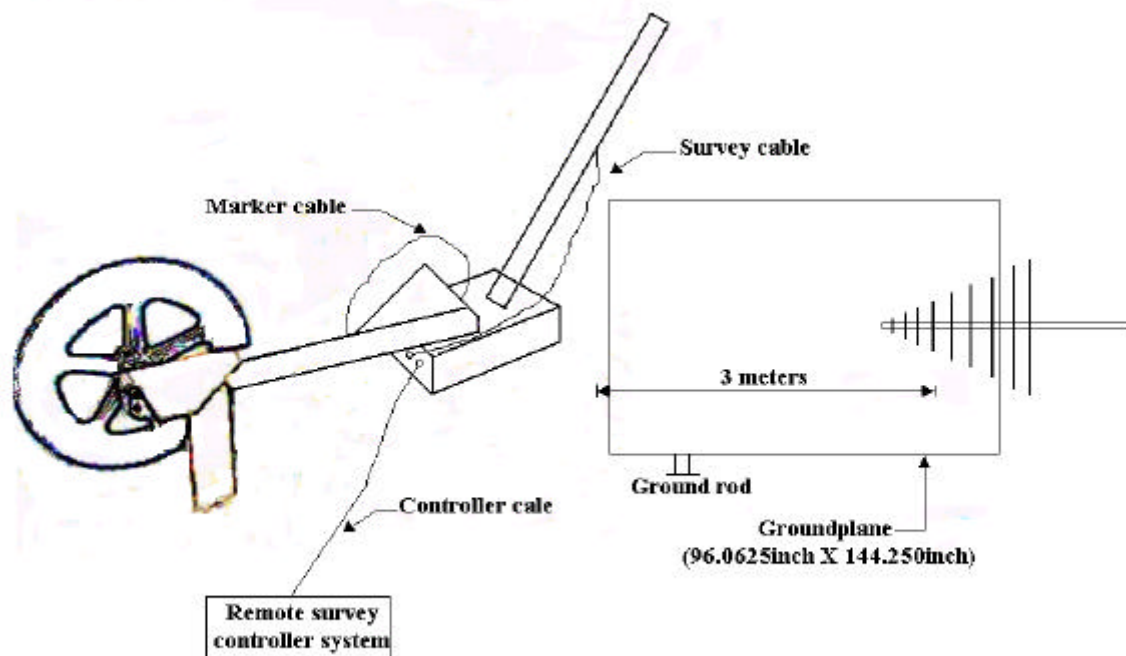


FIGURE 1.3-1 TEST SETUP BLOCK DIAGRAM (M/N 3101D)

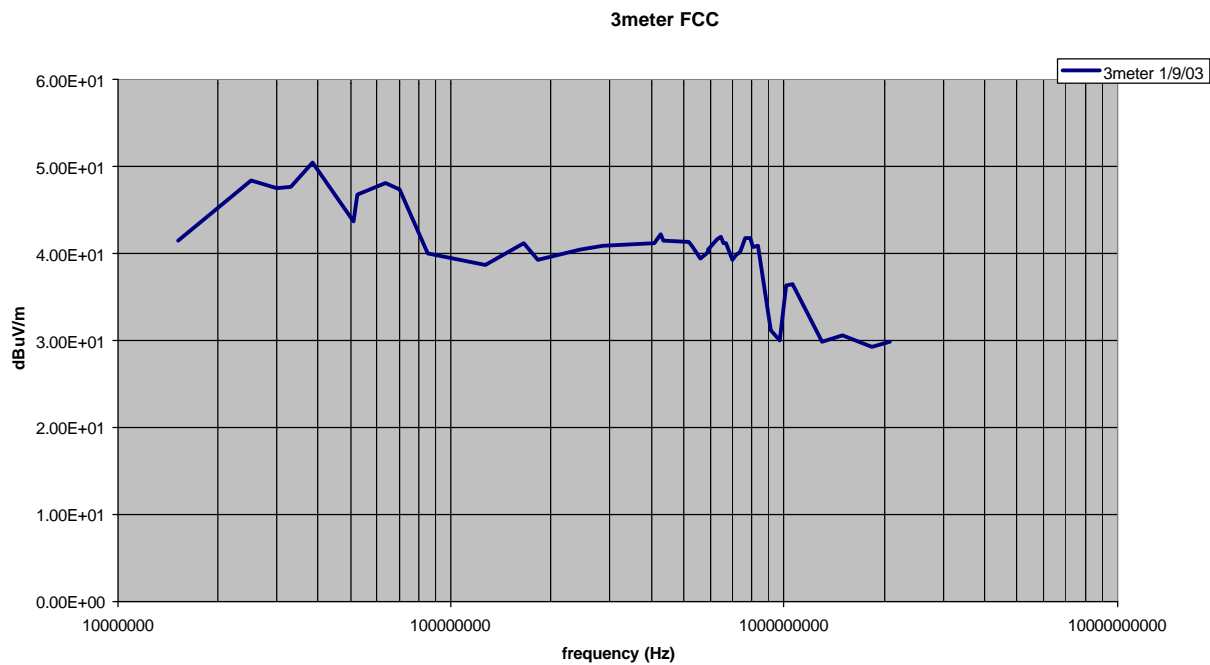


FIGURE 3.2-1 3101D 10dB BANDWIDTH

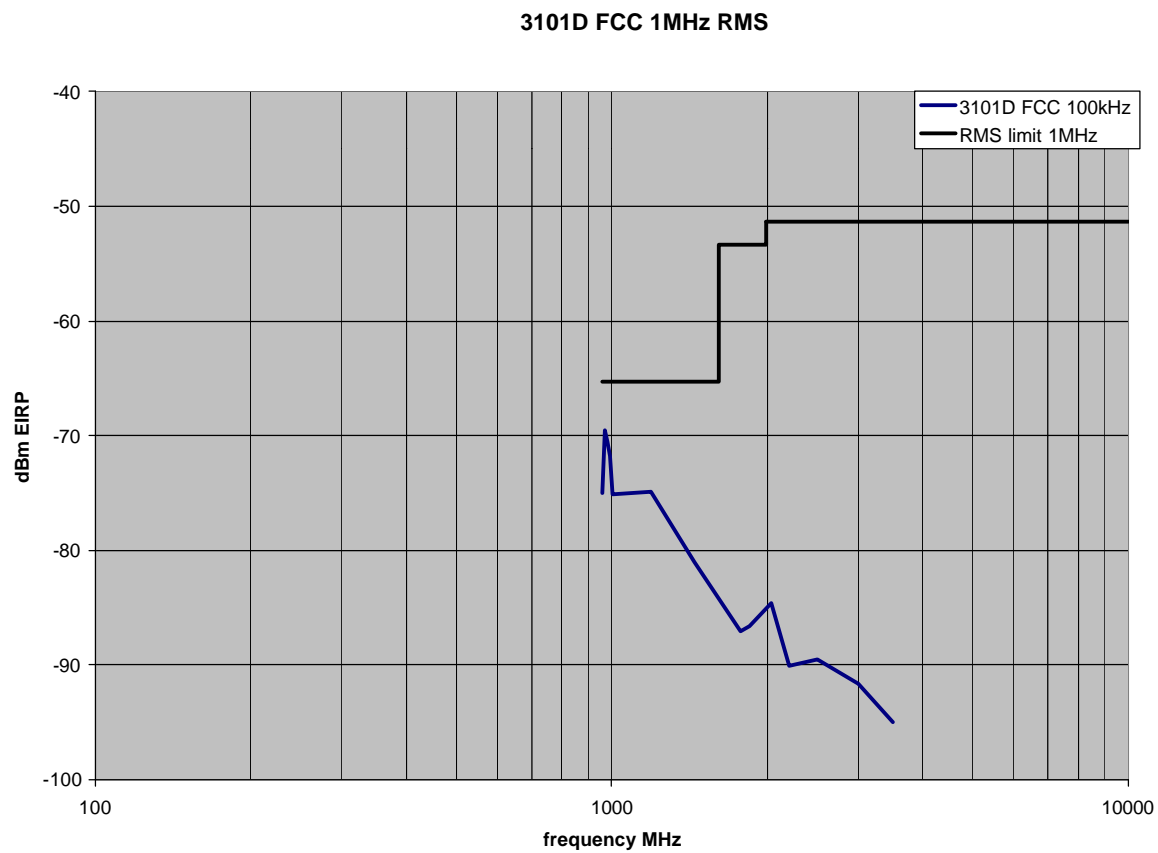


FIGURE 4.2-1 3101D RMS (RBW=1MHz)

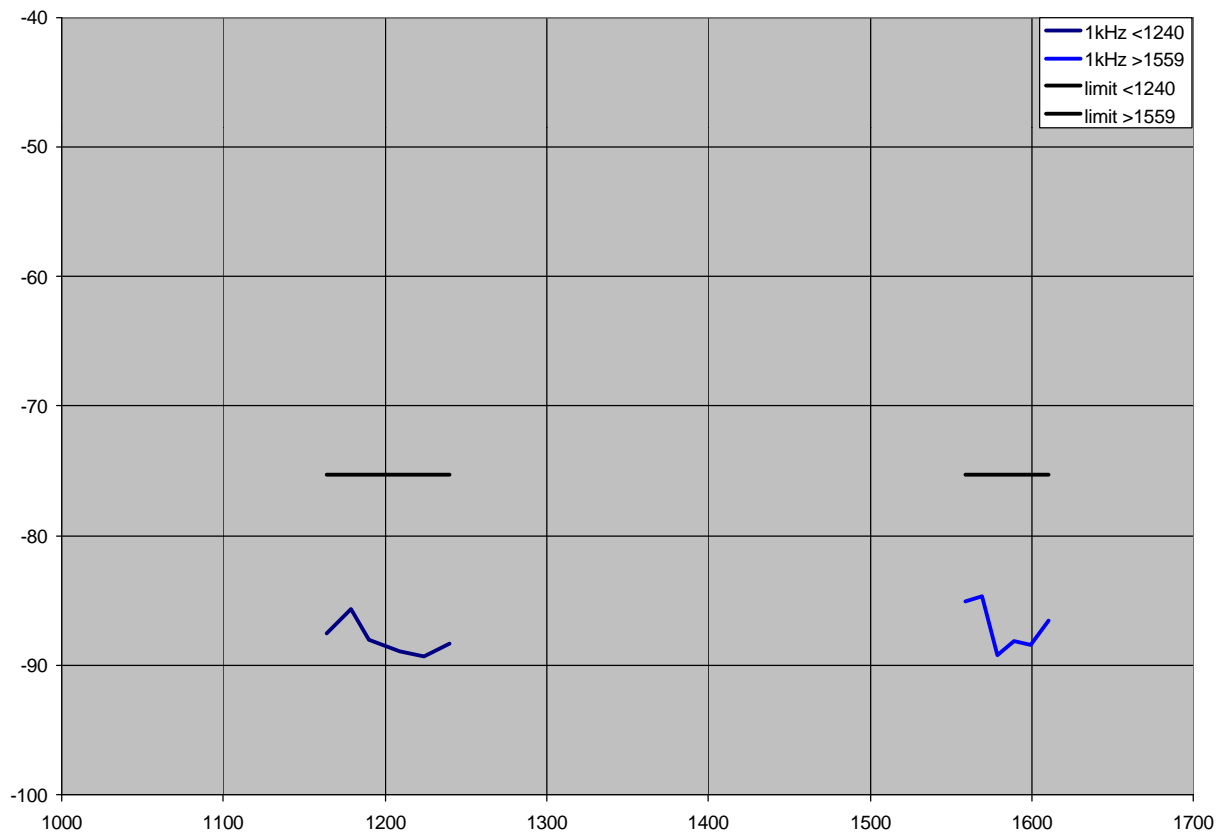


FIGURE 4.3-1 3101D RMS (GPS; RBW=1kHz)

**9. REVISION HISTORY**

16 January 2003	Issue date
30 January 2003	Add columns to data tables (4.2.3; 4.3.3) to show conversion to dBuV/m to dBm EIRP
3 February 2003	Add revision history Add conducted emission data (5.1.3) for SIR-20 Add statement (3.2.2) regarding maximizing EUT orientations