

Electromagnetic Compatibility Test Report

Tests Performed on a goTenna, Inc. goTenna Pro, Model 37337-X2 Radiometrics Document RP-9748A



Product E	Detail:							
FCC ID	FCC ID: 2ABVK373372							
Equipm	Equipment type: 150-479 MHz Transceiver							
' '								
Test Star	dards:							
US CF	R Title 47, Chapter I, F	CC Part 2 and 90						
FCC P	arts 2, 15, and 90 CFR	Title 47: 2023						
IC RSS	S-119 Issue 12							
IC RSS	S-GEN Issue 5							
Tests Per	formed For:		Test Facility:					
goTen	na, Inc.		Radiometrics Midwest Corporation					
81 Will	oughby St.		12 Devonwood Avenue					
Brookly	/n, NY 11201		Romeoville, IL 60446					
			Phone: (815) 293-0772					
Test Date	e(s):							
Januar	y 25 to February 20, 2	023						
Docum	ent RP-9748A Revisio	ns:						
Rev.	Issue Date	Revised By						
0	March 6, 2023	·						



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Test Report for the goTenna, Inc. goTenna Pro, Model 37337-X2

1.0 ADMINISTRATIVE DATA

Equipment Under Test:							
A goTenna, Inc. goTenna Pro							
Model: 37337-X2; Serial Numbers: 023 & 047							
This will be referred to as the EUT in this Report							
Date EUT Received at Radiometrics: (Month-Day-Year)	Test Date(s): (Month-Day-Year)						
January 5, 2023	January 25 to February 15, 2023						
Test Report Written and authorized By:	Test Witnessed By:						
Joseph Strzelecki	The tests were not witnessed by personnel from						
Senior EMC Engineer	goTenna, Inc.						
Radiometrics' Personnel Responsible for Test:	Test Report Approved By						
Joseph Strzelecki 03/06/2023	Chris W. Carlson Director of Engineering NARTE EMC-000921-NE						
Date	NARTE EIVIC-000921-INE						
Joseph Strzelecki							
Senior EMC Engineer							
NARTE EMC-000877-NE							
Richard L. Tichgelaar							
EMC Technician							

2.0 TEST SUMMARY AND RESULTS

The EUT (Equipment Under Test) is a goTenna Pro, Model 37337-X2, manufactured by goTenna, Inc. The detailed test results are presented in a separate section. The following is a summary of the test results.

Transmitter Requirements

Environmental Phenomena	Frequency Range	FCC Sections	RSS 119 Section	Test Result
RF Power Output	450-470 MHz	2.1046 & 90.205	5.4	Pass
Occupied Bandwidth Test; Emissions Masks	150-480 MHz	2.1049 & 90.209	5.5	Pass
Spurious RF Conducted Emissions	1-4800 MHz	2.1051 & 90.210	5.8	Pass
Field Strength of Spurious Radiation	30-4700 MHz	2.1053	5.3	Pass
Frequency Vs. Temperature	450-470 MHz	2.1055 & 90.213	5.3	Pass
Frequency Vs. Voltage	450-470 MHz	2.1055 & 90.213	5.3	Pass
Transient Frequency Behavior	450-470 MHz	90.214	5.9	Pass
Radiated Emissions Receive Mode	30-2000 MHz	FCC part 15	RSS-GEN	Pass

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3.0 EQUIPMENT UNDER TEST (EUT) DETAILS

3.1 EUT Description

The EUT is a goTenna Pro, manufactured by goTenna, Inc. The RF communications link is encrypted in both directions. The EUT was in good working condition during the tests, with no known defects.

4.0 TESTED SYSTEM DETAILS

4.1 Tested System Configuration

The system was configured for testing in a typical fashion. The testing was performed in conditions as close as possible to installed conditions. The wiring was consistent with the manufacturer's recommendations. The networking radio was tested as a stand-alone device. The identification for all equipment used in the tested system, is:

Tested System Configuration List

Item	Description	Type*	Manufacturer	Model Number	Serial Number(s)
1	goTenna Pro Mesh Networking Radio	E	goTenna, Inc.	37337-X2	023, & 047
2	USB power Supply	Р	Apple	A1401	LPS 0012ADU00

^{*} Type: E = EUT; P = Peripheral

Type of modulation including the bit rate	4GFSK; 9.6 & 19.2 kHz
Name and version of the test software used to exercise the device	"goTenna FCC Test App" V1.0.2
Power settings used for the purpose of exercising the device	"5 Watts"
Firmware number of the transmitter	128.0.68

4.2 Special Accessories

No special accessories were used during the tests in order to achieve compliance.

4.3 Equipment Modifications

No modifications were made to the EUT at Radiometrics' test facility in order to comply with the standards listed in this report.

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5.0 TEST SPECIFICATIONS AND RELATED DOCUMENTS

Document	Date	Title
FCC CFR Title 47	2023	Code of Federal Regulations Title 47, Chapter 1, Federal Communications Commission, Part 15 & 90 - Radio Frequency Devices
ANSI C63.4-2014	2014	Methods of Measurement of Radio Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz
ANSI C63.26	2015	American National Standard for Compliance Testing of Transmitters Used in Licensed Radio Services
TIA-603-E	2016	Land Mobile FM or PM Communications Equipment – Measurement and Performance Standards
IC RSS-Gen Issue 5	2018	General Requirements and Information for the Certification of Radiocommunication Equipment (RSS-Gen) + Amd 1 + Amd 2
IC RSS-119 Issue 12	2015	Radio Transmitters and Receivers Operating in the Land Mobile and Fixed Services in the Frequency Range 27.41-960 MHz + Amd 2022

6.0 RADIOMETRICS' TEST FACILITIES

The results of these tests were obtained at Radiometrics Midwest Corp. in Romeoville, Illinois, USA. Radiometrics is accredited by A2LA (American Association for Laboratory Accreditation) to conform to ISO/IEC 17025: 2017 "General Requirements for the Competence of Calibration and Testing Laboratories". Radiometrics' Lab Code is 121191 and Certification Number is 1495.01. A copy of the accreditation can be accessed on our web site (www.radiomet.com). Radiometrics accreditation status can be verified at A2LA's web site (www.a2la2.org).

The following is a list of shielded enclosures located in Romeoville, Illinois used during the tests:

- Chamber A: Is an anechoic chamber that measures 24' L X 12' W X 12' H. The walls and ceiling are fully lined with ferrite absorber tiles. The floor has a 10' x 10' section of ferrite absorber tiles located in the center. Panashield of Rowayton, Connecticut manufactured the chamber. The enclosure is NAMAS certified.
- Chamber B: Is a shielded enclosure that measures 20' L X 12' W X 8' H. Erik A. Lindgren & Associates of Chicago, Illinois manufactured the enclosure.
- Chamber C: Is a shielded enclosure that measures 17' L X 10' W X 8' H. Lindgren RF Enclosures Inc. of Addison, Illinois manufactured the enclosure.
- Chamber E: Is a custom made anechoic chamber that measures 52' L X 30' W X 18' H. The walls and ceiling are fully lined with RF absorbers. Pro-shield of Collinsville, Oklahoma manufactured the chamber.

A separate ten-foot long, brass plated, steel ground rod attached via a 6-inch copper braid grounds each of the above chambers. Each enclosure is also equipped with low-pass power line filters.

The FCC has accepted these sites as test site number US1065. The FCC test site Registration Number is 732175. Details of the site characteristics are on file with the Industry Canada as site number IC 3124A.

7.0 DEVIATIONS AND EXCLUSIONS FROM THE TEST SPECIFICATIONS

There were no deviations or exclusions from the test specifications.

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8.0 CERTIFICATION

Radiometrics Midwest Corporation certifies that the data contained herein was taken under conditions that meet or exceed the requirements of the test specification. The results relate only to the EUT listed herein. Any modifications made to the EUT subsequent to the indicated test date will invalidate the data and void this certification.

9.0 TEST EQUIPMENT TABLE

					Frequency Range	Cal	Cal
RMC ID	Manufacturer	Description	Model No.	Serial No.		Period	Date
AMP-05	RMC/Celeritek	Pre-amplifier	MW110G	1001	1.0-12GHz	12 Mo.	01/04/23
ANT-06	EMCO	Log-Periodic Ant.	3146	1248	200-1000MHz	24 Mo.	01/18/22
ANT-13	EMCO	Horn Antenna	3115	2502	1.0-18GHz	24 Mo.	02/14/23
ANT-42	EMCO	Bicon Antenna	3104C	9512-4713	25-300MHz	24 Mo.	12/15/22
ANT-66	ETS-Lindgren	Horn Antenna	3115	62580	1.0-18GHz	24 Mo.	03/11/21
ANT-68	EMCO	Log-Periodic Ant.	93146	9604-4456	200-1000MHz	24 Mo.	02/07/22
ANT-79	AH Systems	Bicon Antenna	SAS-540	793	20-330MHz	24 Mo.	01/26/23
ANT-80	AH Systems	Bicon Antenna	SAS-540	294	20-330MHz	24 Mo.	01/26/23
ATT-53	Weinschel	Attenuator (20 dB)	23-20-34	CG7857	DC-18 GHz	24 Mo	12/17/21
CDT-01	Wiltron	Crystal RF Detector	75N50	CDT-01	DC-18GHz	N/A	NCR
COM-01	Anaren	Coupler	10023-3	COM-01	250-1000MHz	N/A	NCR
DIR-19	Narda	Directional Coupler	3000-10	01174	200-500MHz	N/A	NCR
DMM-13	Keithley	DMM	2100	1424276	DC-300kHz	24 Mo	02/12/22
HPF-01	Solar	High Pass Filter	7930-100	HPF-1	0.15-30MHz	24 Mo.	03/07/22
LSN-01	Electrometrics	50 uH LISN	FCC/VDE 50/2	1001	0.01-30MHz	24 Mo.	08/23/21
PWM-01	Boonton	Power Meter	4230	22503	50kHz-18GHz	24 Mo.	02/12/22
REC-11	HP / Agilent	Spectrum Analyzer	E7405A	US39110103	9Hz-26.5GHz	24 Mo.	05/05/22
			85460A/84562	33330A00135			
REC-20	HP / Agilent	Spectrum Analyzer	Α	3410A00178	30Hz-6GHz	24 Mo.	08/18/21
REC-44	Agilent	Spectrum Analyzer	E4440A	US40420673	3Hz-26.5GHz	24 Mo.	03/31/22
SCP-05	Tektronix	Oscilloscope	TDS320	B032608	DC-100 MHz	24 Mo.	02/04/22
	Rohde	Vector Signal					
SIG-31	Schwarz	Generator	SMJ 100A	101395	100kHz-6GHz	36 Mo.	09/08/20
	GS Blue M	Temperature					
TC-01	Electric	Chamber	ETC-04S-E	0003-ETC-201	-40 to 100 Deg C	24 Mo.	10/14/22
THM-03	Fluke	Temp/Humid Meter	971	95850465	N/A	24 Mo.	05/25/21

Note: All calibrated equipment is subject to periodic checks.

NCR - No Calibration Required. Device monitored by calibrated equipment. N/A: Not Applicable.

All Equipment calibration was current while it was being used for the tests.

Note: All calibrated equipment is subject to periodic checks.

Software Company	Test Software Name	Version	Applicable Tests
Radiometrics	EN550XX0	07.21.22	RF Conducted Emissions (FCC/CE)
Radiometrics	REREC11D	07.25.22	RF Radiated Emissions (FCC/CE)

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10.0 TEST SECTIONS

10.1 Peak Output Power

The peak power was measured by connecting the EUT antenna port to the spectrum analyzer via a low loss coaxial cable and an appropriate power attenuator.

Model	37337-X2	Specification	FCC part 90.205
Serial Number	023	Test Date	January 31, 2023
Test Personnel	Joseph Strzelecki	Test Location	Chamber B
Test Equipment	Attenuator ATT-53; PWM-01		

TX Freq MHz	Reading dBm	Attenuator dB	Cable Loss dB	Total dBm	Peak Power Watts
150.0250	16.75	20.03	36.78	4.764	150.0250
162.0000	16.68	20.02	36.70	4.677	162.0000
173.2750	16.74	20.01	36.75	4.732	173.2750
450.0250	16.25	20.09	36.34	4.305	450.0250
460.0000	16.53	20.13	36.66	4.634	460.0000
469.9750	16.62	20.14	36.76	4.742	469.9750
479.0000	16.74	20.12	36.86	4.853	479.0000

Judgement: Pass

10.2 Occupied Bandwidth; Emissions Masks

Model	37337-X2	Specification	FCC Part 90.209 & 90.2105 RSS-119 Section 5.5
Test Date	February 3, 2021	Test Personnel	Joseph Strzelecki
Test Equipment	Spectrum Analyzer (REC-21)		

The spectrum analyzer was set to the MAX HOLD mode to record the worst case of the modulation. The EUT was transmitting at its maximum data rate. The trace was allowed to stabilize.

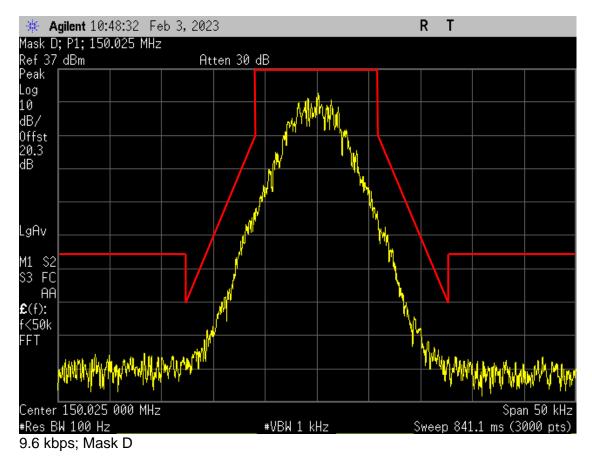
Emission Masks:

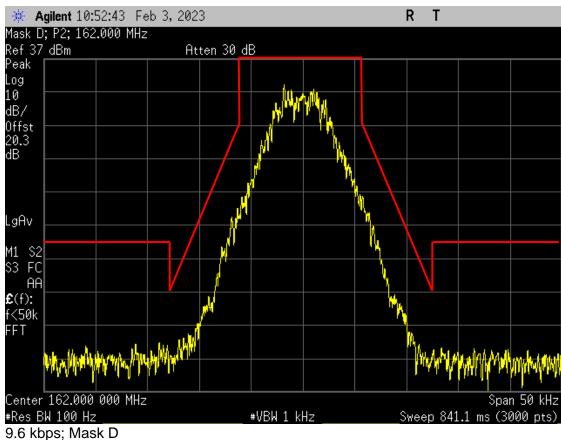
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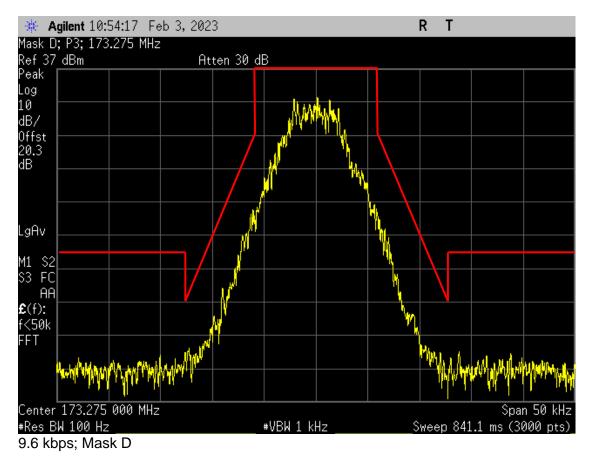


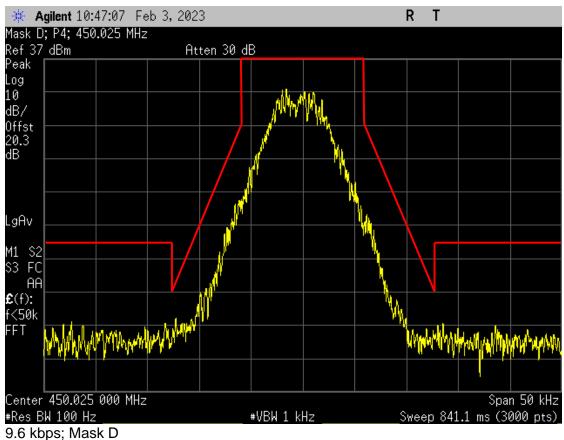
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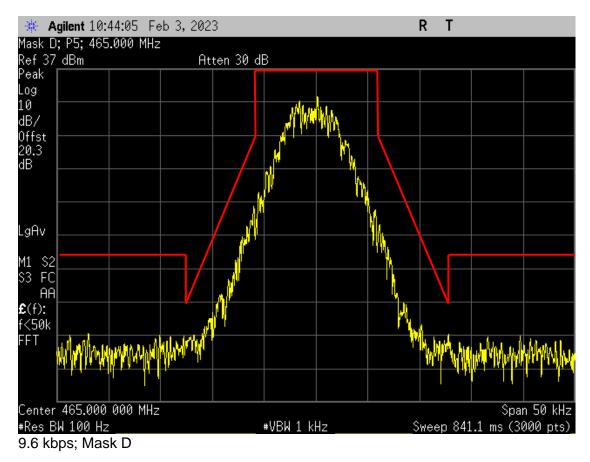


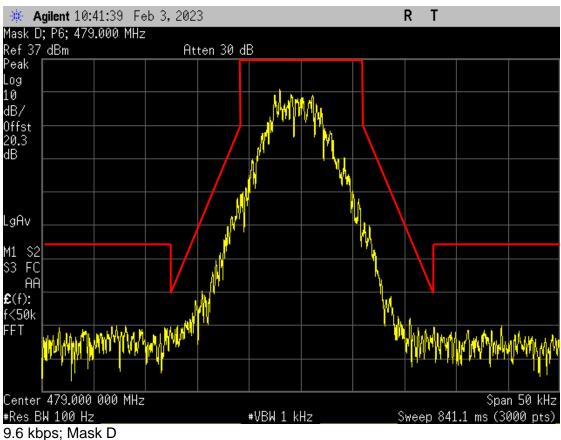
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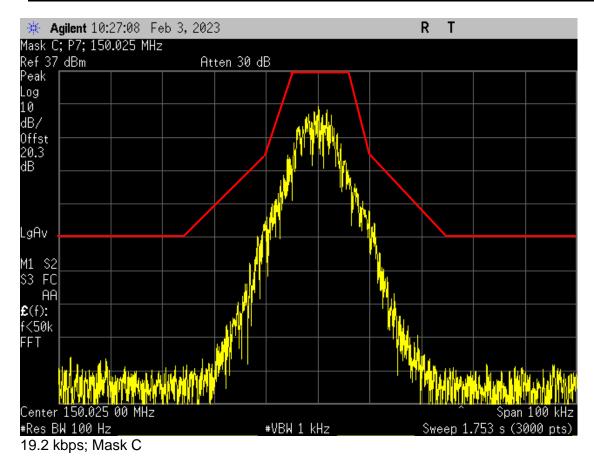


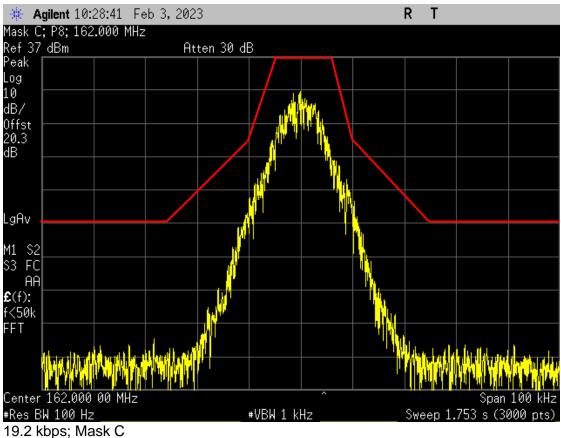
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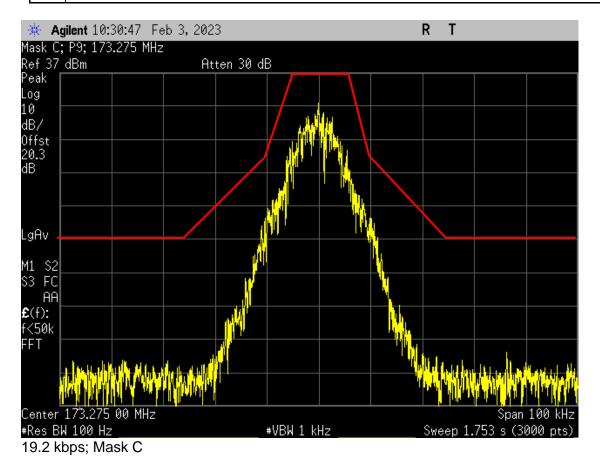


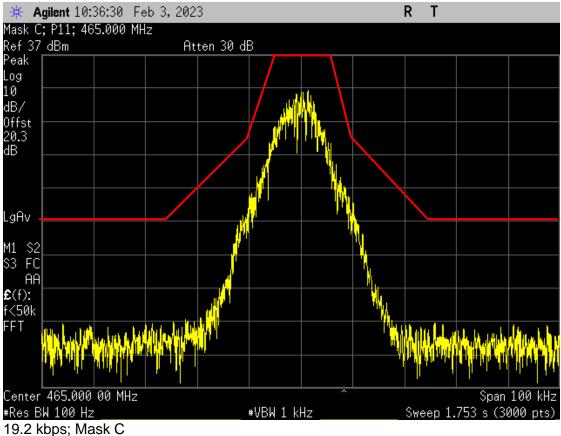
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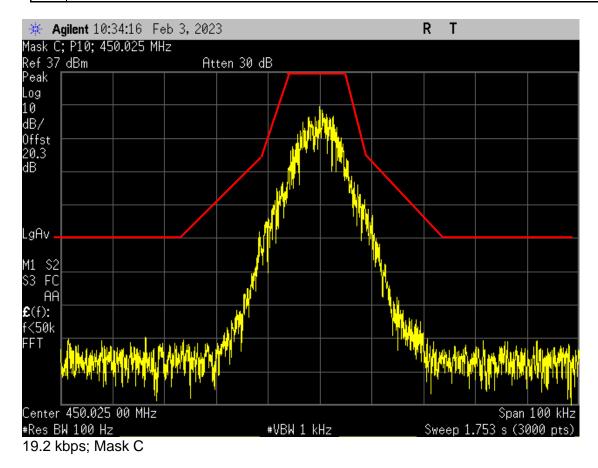


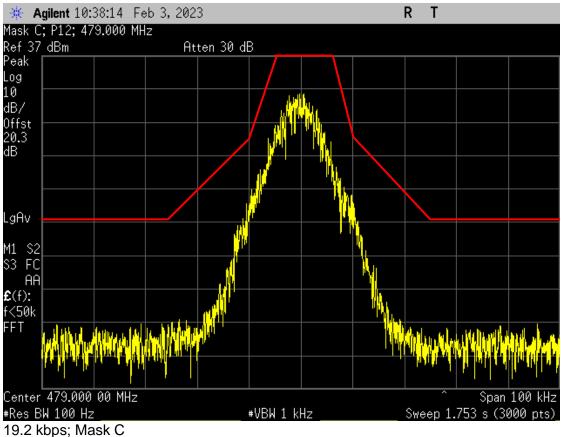
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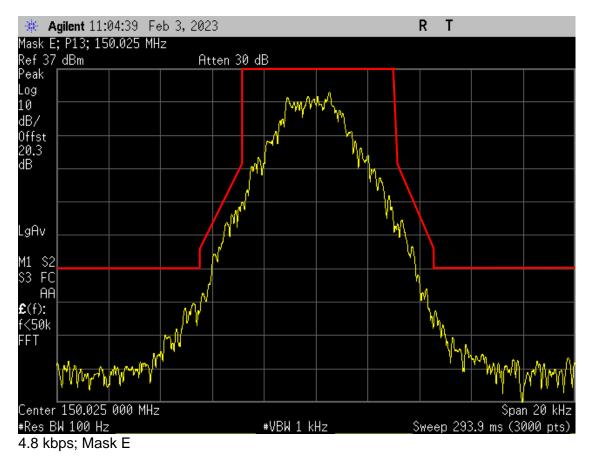


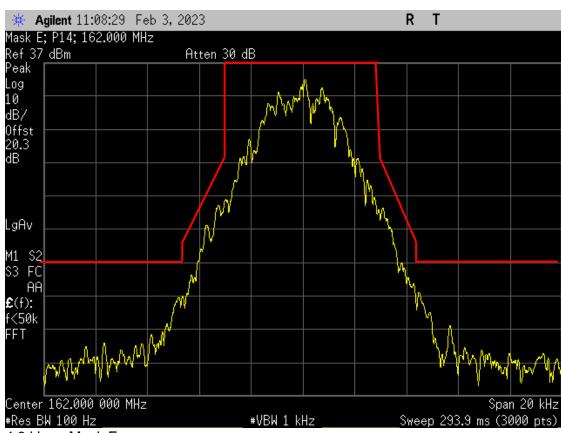
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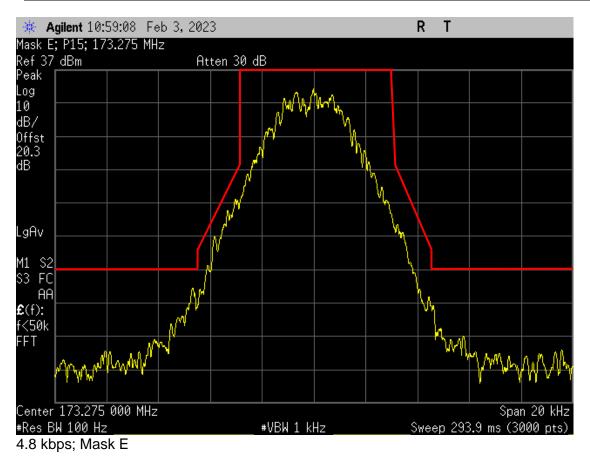
4.8 kbps; Mask E

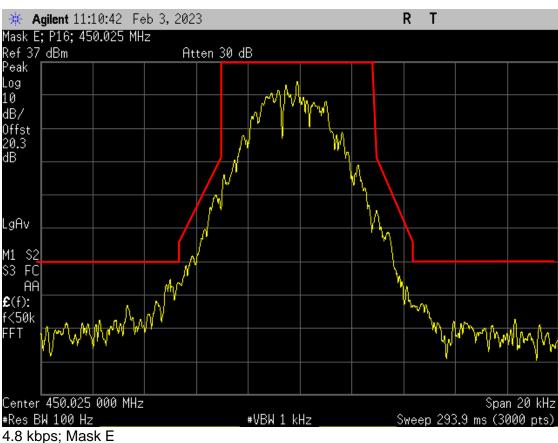
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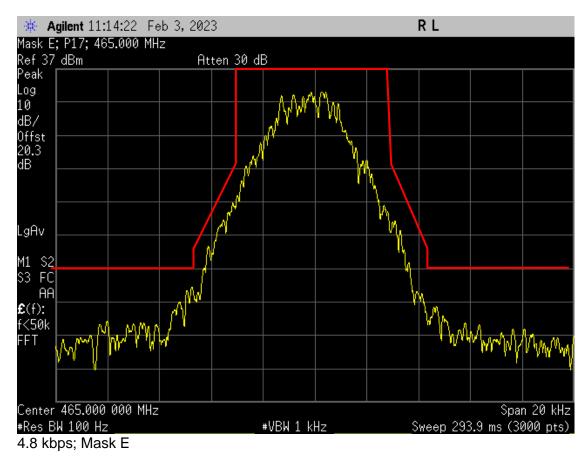


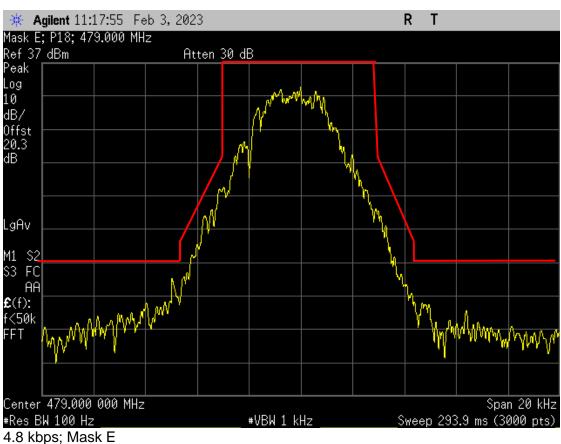
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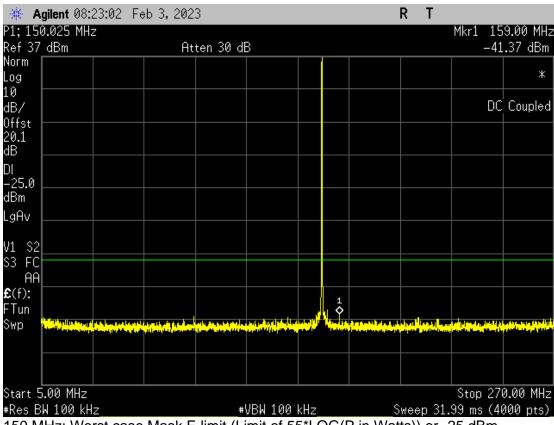
Radiometrics Midwest Corporation

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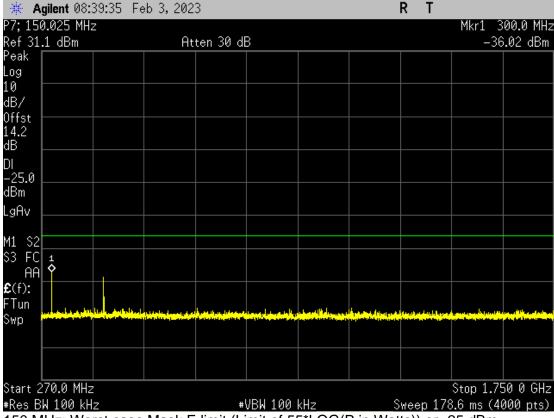




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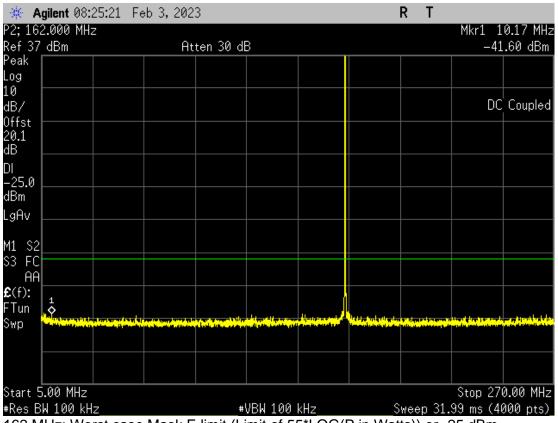




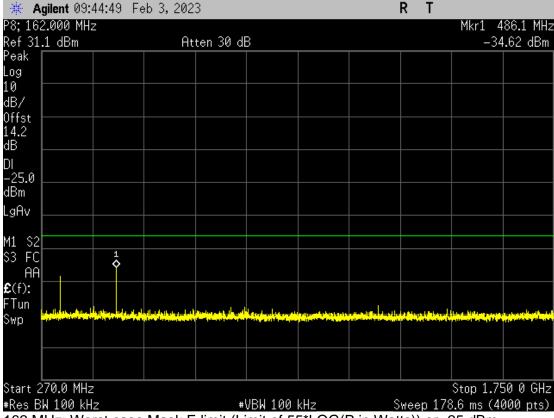


150 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

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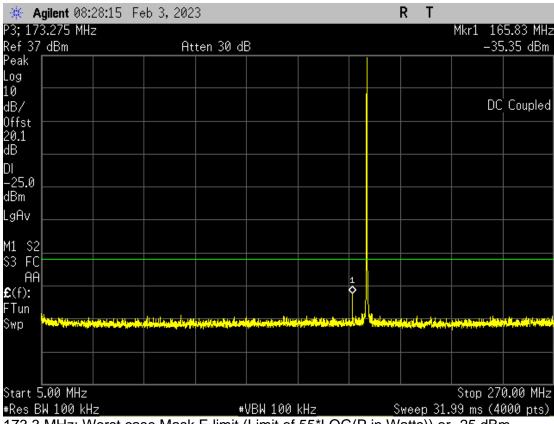


162 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

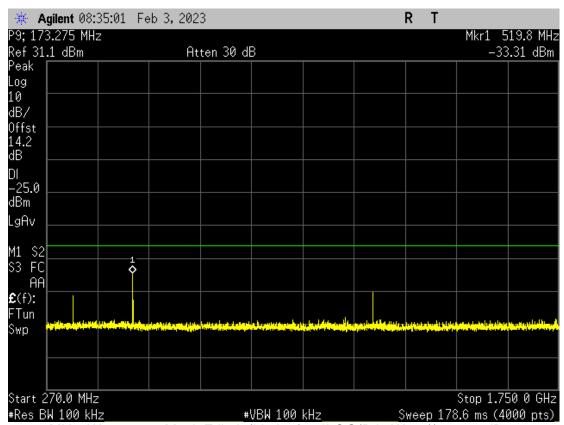
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173.3 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

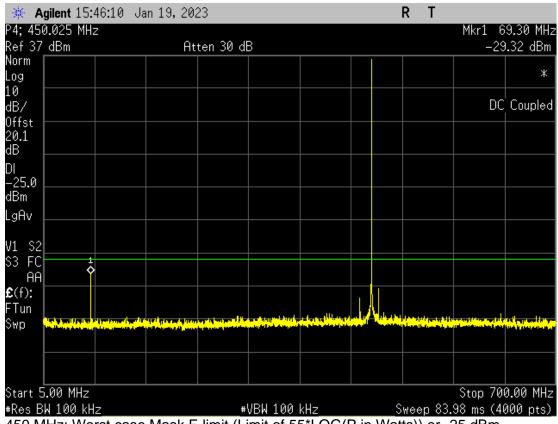


173.3 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

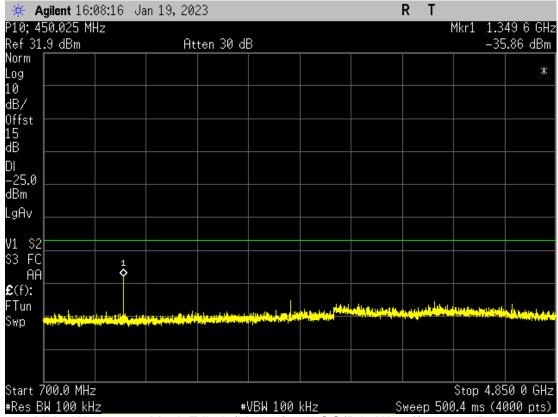
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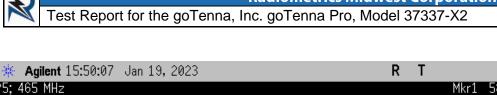


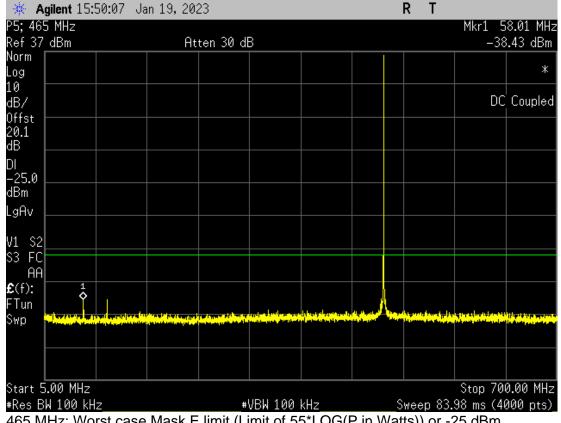
450 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm



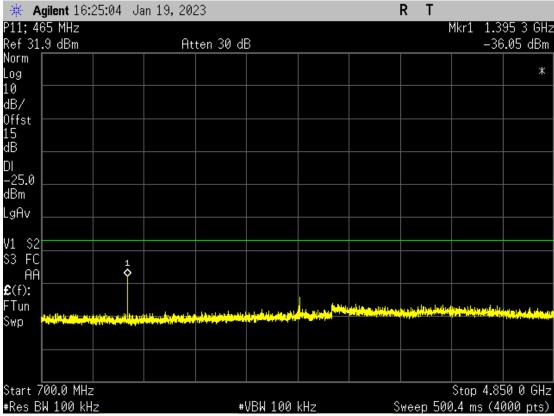
450 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

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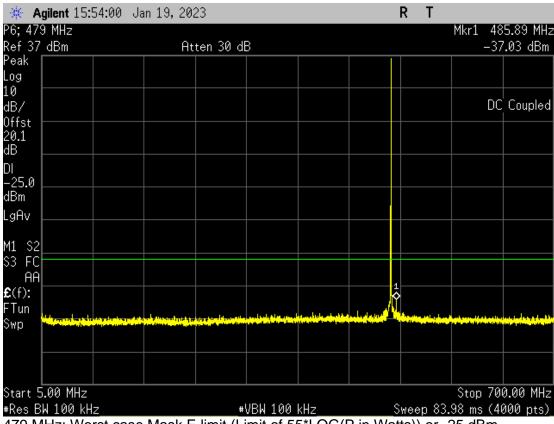
465 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm



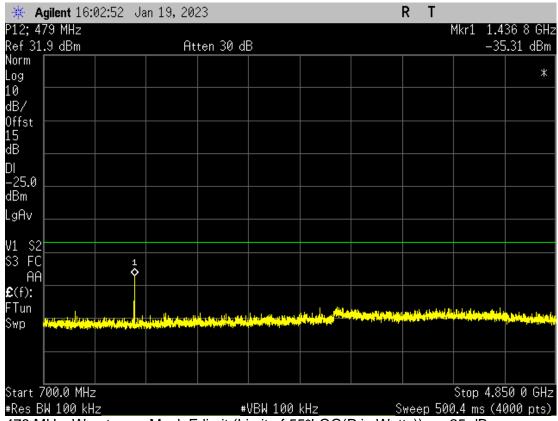
465 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm

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479 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm



479 MHz; Worst case Mask E limit (Limit of 55*LOG(P in Watts)) or -25 dBm Judgement: Pass

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10.3 Occupied Bandwidth

Model	37337-X2	Specification	FCC part 90
Serial Number	023	Test Personnel	Joseph Strzelecki
Test Date	February 3, 2023	Test Location	Chamber B
Test Equipment	Spectrum Analyzer (REC-44)	_	

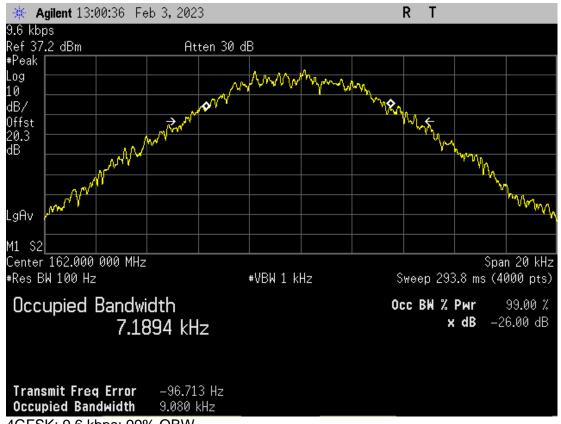
	12.5 kHz	25 kHz			
Channel	9.6 kbps	19.2 kbps			
MHz	99% OBW; All results in kHz				
150.025	7.2423	11.3861			
162.000	7.1984	11.9148			
173.300	7.4061	11.6212			
450.0250	7.1369	11.3052			
465.000	7.2444	11.8508			
479.000	7.3438	11.7168			



4GFSK; 9.6 kbps; 99% OBW

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4GFSK; 9.6 kbps; 99% OBW



4GFSK: 9.6 kbps: 99% OBW

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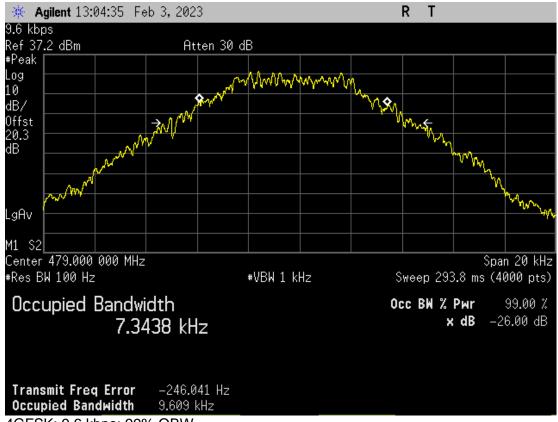
4GFSK; 9.6 kbps; 99% OBW



4GFSK: 9.6 kbps: 99% OBW

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4GFSK; 9.6 kbps; 99% OBW



4GFSK; 19.2 kbps; 99% OBW

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4GFSK; 19.2 kbps; 99% OBW



4GFSK: 19.2 kbps: 99% OBW

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4GFSK; 19.2 kbps; 99% OBW #46



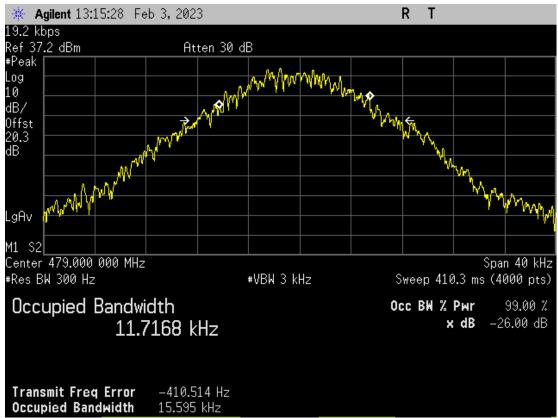
4GFSK: 19.2 kbps: 99% OBW

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Radiometrics Midwest Corporation

Test Report for the goTenna, Inc. goTenna Pro, Model 37337-X2



4GFSK; 19.2 kbps; 99% OBW

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10.3.1 Conducted Spurious Emissions

Model	37337-X2	Specification	FCC Part 90.210		
		-	RSS-119 Section 5.8		
Serial Number	047	Test Date	January 25, 2023		
Test Personnel	Joseph Strzelecki	Test Location	Chamber B		
Test Equipment	quipment EMI Receiver (REC-44); Attenuator (ATT-53)				

This is a direct measurement from the Antenna port to the EMI Receiver

				HPF	Ext.				Margin
		Tested	Rec	Attn.	Atten.	Cable	Total	Power	Under
Freq. Tx	Harm	Freq.	Reading	Factor	Factor	Loss	Power	Limit	Limit
MHz	#	MHz	dBm	dB	dB	dB	dBm	dBm	dB
150.0250	2	300.0500	-52.6	0.4	19.9	0.2	-32.1	-20.0	12.1
150.0250	3	450.0750	-56.6	0.4	19.9	0.2	-36.1	-20.0	16.1
150.0250	4	600.1000	-65.4	0.4	19.9	0.3	-44.8	-20.0	24.8
150.0250	5	750.1250	-70.0	0.5	19.9	0.3	-49.3	-20.0	29.3
150.0250	6	900.1500	-70.0	0.6	19.9	0.3	-49.2	-20.0	29.2
150.0250	7	1050.1750	-70.0	0.5	19.9	0.3	-49.3	-20.0	29.3
150.0250	8	1200.2000	-70.0	0.8	19.9	0.4	-48.9	-20.0	28.9
150.0250	9	1350.2250	-70.0	1.0	19.9	0.4	-48.7	-20.0	28.7
150.0250	10	1500.2500	-70.0	1.0	19.9	0.4	-48.7	-20.0	28.7
162.0000	2	324.0000	-52.2	0.4	19.9	0.2	-31.7	-20.0	11.7
162.0000	3	486.0000	-48.3	0.4	19.9	0.3	-27.7	-20.0	7.7
162.0000	4	648.0000	-63.5	0.4	19.9	0.3	-42.9	-20.0	22.9
162.0000	5	810.0000	-70.0	0.5	19.9	0.3	-49.3	-20.0	29.3
162.0000	6	972.0000	-70.0	0.6	19.9	0.3	-49.2	-20.0	29.2
162.0000	7	1134.0000	-70.0	0.5	19.9	0.4	-49.2	-20.0	29.2
162.0000	8	1296.0000	-70.0	0.8	19.9	0.4	-48.9	-20.0	28.9
162.0000	9	1458.0000	-70.0	1.0	19.9	0.4	-48.7	-20.0	28.7
162.0000	10	1620.0000	-70.0	1.0	19.9	0.4	-48.7	-20.0	28.7
173.2750	2	346.5500	-57.5	0.4	19.9	0.2	-37.0	-20.0	17.0
173.2750	3	519.8250	-48.4	0.4	19.9	0.3	-27.8	-20.0	7.8
173.2750	4	693.1000	-68.1	0.4	19.9	0.3	-47.5	-20.0	27.5
173.2750	5	866.3750	-66.5	0.5	19.9	0.3	-45.8	-20.0	25.8
173.2750	6	1039.6500	-55.9	0.6	19.9	0.3	-35.1	-20.0	15.1
173.2750	7	1212.9250	-61.8	0.5	19.9	0.4	-41.0	-20.0	21.0
173.2750	8	1386.2000	-63.2	0.8	19.9	0.4	-42.1	-20.0	22.1
173.2750	9	1559.4750	-66.4	1.0	19.9	0.4	-45.1	-20.0	25.1
173.2750	10	1732.7500	-68.4	1.0	19.9	0.5	-47.0	-20.0	27.0
450.0250	2	900.0500	-61.0	0.4	14.0	0.3	-46.3	-20.0	26.3
450.0250	3	1350.0750	-46.5	0.4	14.0	0.4	-31.7	-20.0	11.7
450.0250	4	1800.1000	-64.6	0.4	14.0	0.5	-49.7	-20.0	29.7
450.0250	5	2250.1250	-62.3	0.5	14.0	0.6	-47.2	-20.0	27.2
450.0250	6	2700.1500	-62.1	0.6	14.0	0.6	-46.9	-20.0	26.9
450.0250	7	3150.1750	-56.5	0.5	14.0	0.6	-41.4	-20.0	21.4
450.0250	8	3600.2000	-61.3	0.8	14.0	0.7	-45.8	-20.0	25.8
450.0250	9	4050.2250	-57.6	1.0	14.0	0.7	-41.9	-20.0	21.9
450.0250	10	4500.2500	-67.0	1.0	14.0	0.7	-51.3	-20.0	31.3
460.0000	2	920.0000	-60.6	0.4	14.0	0.3	-45.9	-20.0	25.9
460.0000	3	1380.0000	-47.1	0.4	14.0	0.4	-32.3	-20.0	12.3
460.0000	4	1840.0000	-64.1	0.4	14.0	0.5	-49.2	-20.0	29.2
460.0000	5	2300.0000	-59.3	0.5	14.0	0.5	-44.3	-20.0	24.3

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				HPF	Ext.				Margin
		Tested	Rec	Attn.	Atten.	Cable	Total	Power	Under
Freq. Tx	Harm	Freq.	Reading	Factor	Factor	Loss	Power	Limit	Limit
MHz	#	MHz	dBm	dB	dB	dB	dBm	dBm	dB
460.0000	6	2760.0000	-58.7	0.6	14.0	0.6	-43.5	-20.0	23.5
460.0000	7	3220.0000	-64.3	0.5	14.0	0.6	-49.2	-20.0	29.2
460.0000	8	3680.0000	-60.7	0.8	14.0	0.7	-45.2	-20.0	25.2
460.0000	9	4140.0000	-70.0	1.0	14.0	0.7	-54.3	-20.0	34.3
460.0000	10	4600.0000	-68.2	1.0	14.0	0.7	-52.5	-20.0	32.5
469.9750	2	939.9500	-59.4	0.4	14.0	0.3	-44.7	-20.0	24.7
469.9750	3	1409.9250	-47.3	0.4	14.0	0.4	-32.5	-20.0	12.5
469.9750	4	1879.9000	-63.0	0.4	14.0	0.5	-48.1	-20.0	28.1
469.9750	5	2349.8750	-59.5	0.5	14.0	0.5	-44.5	-20.0	24.5
469.9750	6	2819.8500	-65.5	0.6	14.0	0.6	-50.3	-20.0	30.3
469.9750	7	3289.8250	-60.1	0.5	14.0	0.6	-45.0	-20.0	25.0
469.9750	8	3759.8000	-60.9	0.8	14.0	0.7	-45.4	-20.0	25.4
469.9750	9	4229.7750	-66.8	1.0	14.0	0.8	-51.0	-20.0	31.0
469.9750	10	4699.7500	-69.4	1.0	14.0	0.7	-53.7	-20.0	33.7
479.0000	2	958.0000	-57.3	0.4	14.0	0.3	-42.6	-20.0	22.6
479.0000	3	1437.0000	-46.0	0.4	14.0	0.4	-31.2	-20.0	11.2
479.0000	4	1916.0000	-63.5	0.4	14.0	0.5	-48.6	-20.0	28.6
479.0000	5	2395.0000	-55.9	0.5	14.0	0.5	-40.9	-20.0	20.9
479.0000	6	2874.0000	-61.7	0.6	14.0	0.6	-46.5	-20.0	26.5
479.0000	7	3353.0000	-57.2	0.5	14.0	0.7	-42.0	-20.0	22.0
479.0000	8	3832.0000	-61.3	0.8	14.0	0.7	-45.8	-20.0	25.8
479.0000	9	4311.0000	-66.5	1.0	14.0	8.0	-50.7	-20.0	30.7
479.0000	10	4790.0000	-68.5	1.0	14.0	8.0	-52.7	-20.0	32.7

Judgment: Passed by at least 7.7 dB.

10.4 Field Strength of Unwanted Spurious Radiation

10.4.1 Test Procedures

Radiated emission measurements in the Restricted bands were performed with linearly polarized broadband antennas. The results obtained with these antennas can be correlated with results obtained with a tuned dipole antenna. A 10 dB linearity check is performed prior to start of testing in order to determine if an overload condition exists. From 30 to 4700 MHz, a spectrum analyzer with a preselector was used for measurement. Radiated emissions measurements were performed at the anechoic chamber at a test distance of 3 meters. The entire frequency range from 30 to 4700 MHz was slowly scanned and the emissions in the restricted frequency bands were recorded. Measurements were performed using the peak detector function.

The spectrum analyzer was adjusted for the following settings:

- 1) Resolution Bandwidth = 100 kHz for spurious emissions below 1 GHz, and 1 MHz for spurious emissions above 1GHz.
- 2) Video Bandwidth = 300 kHz for spurious emissions below 1 GHz, and 3 MHz for spurious emissions above 1 GHz.
- 3) Sweep Speed slow enough to maintain measurement calibration.
- 4) Detector Mode = Positive Peak.

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The transmitter to be tested was placed on the turntable in the standard test site, or an FCC listed site compliant with ANSI C63.4. The transmitter is transmitting into a non-radiating load that is placed on the turntable. Measurements were made from the lowest radio frequency generated in the equipment to the tenth harmonic of the carrier. The transmitter was keyed during the tests.

For each spurious frequency, the test antenna was raised and lowered from 1 m to 4m to obtain a maximum reading on the spectrum analyzer with the test antenna at horizontal polarity. Then the turntable was rotated 360°to determine the maximum reading. This procedure was repeated to obtain the highest possible reading. This maximum reading was recorded.

Each measurement was repeated for each spurious frequency with the test antenna polarized vertically.

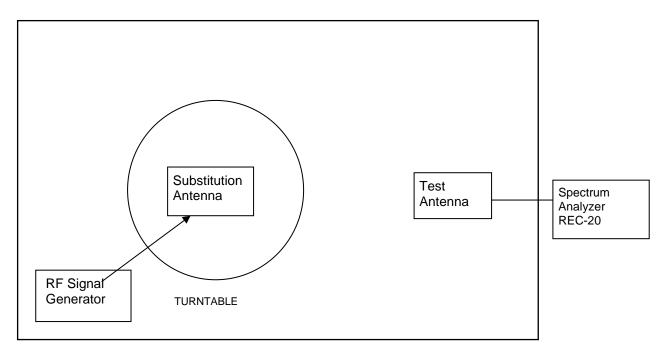


Figure 1. Drawing of Radiated Emissions Setup

ANSI C63.4 Listed Test Site

Notes:

- Test Antenna height varied from 1 to 4 meters
- Distance from antenna to tested system is 3 meters
- Not to Scale

Frequency MHz	Test Antenna	Substitution Antenna	Receiver to Coupler	Signal Generator
30 - 200	ANT-79	ANT-80	REC-21	SIG-31
200 - 1000	ANT-06	ANT-68	REC-21	SIG-31
1000-5000	ANT-13	ANT-36	REC-21	SIG-31

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The transmitter was removed and replaced with a broadband substitution antenna. The substitution antenna is calibrated so that the gain relative to a dipole is known. The center of the substitution antenna was approximately at the same location as the center of the transmitter.

The substitution antenna was fed at the transmitter end with a signal generator connected to the antenna by means of a non-radiating cable. With the antennas at both ends horizontally polarized, and with the signal generator tuned to a particular spurious frequency, the test antenna was raised and lowered to obtain a maximum reading at the spectrum analyzer. The level of the signal generator output was adjusted until the previously recorded maximum reading for this set of conditions was obtained.

The measurements were repeated with both antennas horizontally and vertically polarized for each spurious frequency.

The power in dBm into a reference ideal half-wave dipole antenna was calculated by reducing the readings obtained in steps k) and l) by the power loss in the cable between the generator and the antenna, and further corrected for the gain of the substitution antenna used relative to an ideal half-wave dipole antenna by the following formula:

Pd(dBm) = Pg(dBm) - cable loss (dB) + antenna gain (dB)

where:

Pd is the dipole equivalent power and

Pg is the generator output power into the substitution antenna.

The Pd levels recorded in step m) are the absolute levels of radiated spurious emissions in dBm.

Any emission must be attenuated below the power (P) of the highest emission contained within the authorized bandwidth as follows:

On any frequency removed from the center of the authorized bandwidth by a displacement frequency (fd in kHz) of more than 6.25 kHz: At least 55 + 10 log (P) dB.

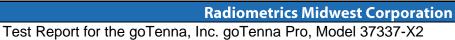
Since by mathematical definition, P(dBm) - (55+10xLOG P(W)) = -25 dBm, the limit for spurious emissions was set to -25 dBm equivalent radiated power.

10.4.2 Spurious Radiated Emissions Test Results

Model	37337-X2	Specification	FCC Part 90.210 RSS-119 Section 5.8
Serial Number	047	Test Date	February 9, 10 & 20, 2023
Test Personnel	Chris Dalessio	Test Location	Chamber E
Test Distance	3 Meters	Notes	Transmit Mode

	Tx	Measured	•	nt Radiated wer		Margin I	Inder Limit
Harmonic	Freq	Freq	Vertical	Horizontal	Limit	Vertical	Horizontal
Harmonic	rieq	rieq	verticai	HUHZUHlai	LIIIII	Vertical	Honzoniai
#	MHz	MHz	dBm	dBm	dBm	dB	dB
2	150.025	300.050	-57.5	-53.4	-20.0	37.5	33.4
3	150.025	450.075	-53.3	-54.3	-20.0	33.3	34.3
4	150.025	600.100	-54.2	-54.5	-20.0	34.2	34.5
5	150.025	750.125	-42.8	-37.2	-20.0	22.8	17.2
6	150.025	900.150	-43.5	-45.1	-20.0	23.5	25.1
7	150.025	1050.175	-48.4	-47.7	-20.0	28.4	27.7
8	150.025	1200.200	-45.5	-45.6	-20.0	25.5	25.6
9	150.025	1350.225	-42.9	-46.0	-20.0	22.9	26.0

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			Equivaler	nt Radiated			
	Tx	Measured	•	wer		Margin L	Jnder Limit
Harmonic	Freq	Freq	Vertical	Horizontal	Limit	Vertical	Horizontal
#	MHz	MHz	dBm	dBm	dBm	dB	dB
10	150.025	1500.250	-41.3	-44.1	-20.0	21.3	24.1
2	162.000	324.000	-45.2	-48.9	-20.0	25.2	28.9
3	162.000	486.000	-45.7	-49.7	-20.0	25.7	29.7
4	162.000	648.000	-49.2	-43.9	-20.0	29.2	23.9
5	162.000	810.000	-35.3	-35.6	-20.0	15.3	15.6
6	162.000	972.000	-49.9	-48.5	-20.0	29.9	28.5
7	162.000	1134.000	-46.5	-46.2	-20.0	26.5	26.2
8	162.000	1296.000	-44.8	-44.8	-20.0	24.8	24.8
9	162.000	1458.000	-44.7	-44.6	-20.0	24.7	24.6
10	162.000	1620.000	-42.6	-42.5	-20.0	22.6	22.5
2	173.275	346.550	-46.7	-52.0	-20.0	26.7	32.0
3	173.275	519.825	-44.3	-48.3	-20.0	24.3	28.3
4	173.275	693.100	-42.2	-48.2	-20.0	22.2	28.2
5	173.275	866.375	-29.2	-40.5	-20.0	9.2	20.5
6	173.275	1039.650	-47.9	-48.6	-20.0	27.9	28.6
7	173.275	1212.925	-48.2	-47.4	-20.0	28.2	27.4
8	173.275	1386.200	-44.7	-47.4	-20.0	24.7	27.4
9	173.275	1559.475	-43.7	-45.6	-20.0	23.7	25.6
10	173.275	1732.750	-43.1	-43.3	-20.0	23.1	23.3
2	450.025	900.050	-22.6	-24.9	-20.0	2.6	4.9
3	450.025	1350.075	-27.0	-24.6	-20.0	7.0	4.6
4	450.025	1800.100	-27.0	-30.9	-20.0	7.0	10.9
5	450.025	2250.125	-27.6	-32.7	-20.0	7.6	12.7
6	450.025	2700.150	-27.6	-30.8	-20.0	7.6	10.8
7	450.025	3150.175	-29.4	-29.6	-20.0	9.4	9.6
8	450.025	3600.200	-36.7	-37.4	-20.0	16.7	17.4
9	450.025	4050.225	-38.2	-40.3	-20.0	18.2	20.3
10	450.025	4500.250	-37.8	-37.4	-20.0	17.8	17.4
2	465.000	930.000	-23.0	-33.4	-20.0	3.0	13.4
3	465.000	1395.000	-27.4	-28.7	-20.0	7.4	8.7
4	465.000	1860.000	-38.0	-39.1	-20.0	18.0	19.1
5	465.000	2325.000	-38.3	-37.5	-20.0	18.3	17.5
6	465.000	2790.000	-42.4	-43.1	-20.0	22.4	23.1
7	465.000	3255.000	-35.7	-42.3	-20.0	15.7	22.3
8	465.000	3720.000	-37.8	-38.6	-20.0	17.8	18.6
9	465.000	4185.000	-38.7	-38.6	-20.0	18.7	18.6
10	465.000	4650.000	-36.1	-37.0	-20.0	16.1	17.0
2	479.000	958.000	-26.4	-32.2	-20.0	6.4	12.2
3	479.000	1437.000	-28.9	-28.8	-20.0	8.9	8.8
4	479.000	1916.000	-32.6	-31.9	-20.0	12.6	11.9
5	479.000	2395.000	-32.2	-34.0	-20.0	12.2	14.0
6	479.000	2874.000	-32.8	-34.6	-20.0	12.8	14.6
7	479.000	3353.000	-29.6	-28.8	-20.0	9.6	8.8
8	479.000	3832.000	-37.9	-38.6	-20.0	17.9	18.6
9	479.000	4311.000	-36.8	-38.8	-20.0	16.8	18.8
10	479.000	4790.000	-37.4	-37.2	-20.0	17.4	17.2

Judgment: Passed by at least 2.6 dB.

No other spurious radiated emissions were detected within 10 dB of the limits from 30 MHz to 4.8 GHz.

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10.5 Frequency Stability

10.5.1 Frequency Stability Vs Temperature

The chamber was then set to the lowest temperature. The transmitter was in the chamber and allowed to stabilize for 15 minutes. The transmitter was then keyed, and the frequency was recorded. The chamber was then incremented in 10°C steps with a minimum of 15 minute stabilization period for each temperature measurement. The transmitter was off during the temperature transitions.

10.5.2 Frequency Stability Vs Supply Voltage

The EUT was allowed to stabilize with the nominal primary power supply voltage applied. The primary input voltage was varied.

10.5.3 Test Results for Frequency Stability

Model	37337-X2	Specification	FCC Part 90.213			
			RSS-119 Section 5.3			
Serial Number	023	Test Date	January 26, 2023			
Test Personnel	Joseph Strzelecki	Test Location	Chamber B			
Test Equipment	Spectrum Analyzer (REC-21); Te	mperature Chamb	er TC-01			
	Digital Multimeter (DMM-08)					
Notes	15 minutes at each Temperature;	15 minutes at each Temperature; 1 min at each voltage				
Nominal Frequence	cy 161.9999915 or 464.999792	61.9999915 or 464.999792 MHz				

Volts	Freq.	Deviation	
DC	(MHz)	Hz	PPM
6.8	161.9999945	3	0.02
7.0	161.9999935	2	0.01
7.2	161.9999930	1	0.01
7.4	161.9999910	0	0.00
7.6	161.9999910	0	0.00
7.8	161.9999915	0	0.00
8.0	161.9999910	0	0.00
8.2	161.9999910	0	0.00
8.4	161.9999890	-2	-0.02

Test Requirements: Limit is 2 ppm

Judgement: Pass

Temp	Freq.	Deviation	
Deg. C	(MHz)	Hz	PPM
50	161.999795	-150	-0.93
40	161.999860	-85	-0.52
30	161.999907	-38	-0.23
20	161.999945	0	0.00
10	161.999945	0	0.00
0	161.999917	-28	-0.17
-10	161.999962	17	0.10
-20	161.999920	-25	-0.15
-30	161.999982	37	0.23

Test Requirements: Limit is 2 ppm

Judgement: Pass

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Volts	Freq.	Deviation	
DC	(MHz)	Hz	PPM
6.8	464.999842	50	0.11
7.0	464.999830	38	0.08
7.2	464.999822	30	0.06
7.4	464.999817	25	0.05
7.6	464.999812	20	0.04
7.8	464.999792	0	0.00
8.0	464.999800	8	0.02
8.2	464.999795	3	0.01
8.4	464.999787	-5	-0.01

Test Requirements: Limit is 1 ppm

Judgement: Pass

Temp	Freq.	Deviation	
Deg. C	(MHz)	Hz	PPM
50	464.999445	-367	-0.79
40	464.999702	-110	-0.24
30	464.999732	-80	-0.17
20	464.999812	0	0.00
10	464.999820	8	0.02
0	464.999885	73	0.16
-10	464.999902	90	0.19
-20	464.999907	95	0.20
-30	464.999987	175	0.38

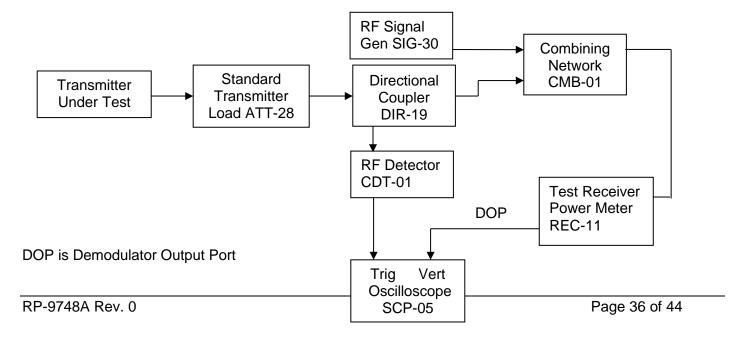
Test Requirements: Limit is 1 ppm

Judgement: Pass

10.6 Transient Frequency Behavior

10.6.1 Test method

The test was performed in accordance with TIA-603-D Section 2.2.19.3 Alternate Method of Measurement (Using a Test Receiver). The equipment was connected as shown below.



10.6.2 Limits of transient frequency

Time intervals 1,2	Maximum Frequency Difference ³	150 to 174 MHz Equipment Operating on 6.25 kHz Channels	421 to 512 MHz Equipment Operating on 6.25 kHz Channels
t ₁ ⁴	±6.25 kHz	5.0 mSec	10.0 mSec
t_2	±3.125 kHz	20.0 mSec	25.0 mSec
t ₃ ⁴	±6.25 kHz	5.0 mSec	10.0 mSec

 $_{\text{on}}$ is the instant when a 1 kHz test signal is completely suppressed, including any capture time due to phasing. $_{\text{t}_{1}}$ is the time period immediately following $_{\text{ton}}$.

toff is the instant when the 1 kHz test signal starts to rise.

10.6.3 Test Results

Model	37337-X2	Specification	FCC part 90.214 RSS-119 Section 5.9
Serial Number	023	Test Date	February 2, 2023
Test Personnel	Joseph Strzelecki	Test Location	Chamber B

	Maximum	All	equipment
Time intervals ¹	frequency difference ³	150 to 174 MHz	421 to 512 MHz
Transient Fre	quency Behavior for Equip	ment Designed to Ope	erate on 25 kHz Channels
t ₁ ⁴	±25.0 kHz	5.0 ms	10.0 ms
t ₂	±12.5 kHz	20.0 ms	25.0 ms
t ₃ ⁴	±25.0 kHz	5.0 ms	10.0 ms
Transient Fred	juency Behavior for Equipr	ment Designed to Oper	ate on 12.5 kHz Channels
t ₁ ⁴	±12.5 kHz	5.0 ms	10.0 ms
t ₂	±6.25 kHz	20.0 ms	25.0 ms
t ₃ ⁴	±12.5 kHz	5.0 ms	10.0 ms

 $^{^{1}}$ _{on} is the instant when a 1 kHz test signal is completely suppressed, including any capture time due to phasing.

 t_1 is the time period immediately following t_{on} .

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t2 is the time period immediately following t1.

t₃ is the time period from the instant when the transmitter is turned off until toff.

 $^{^2}$ During the time from the end of t_2 to the beginning of t_3 , the frequency difference must not exceed the limits specified in § 90.213.

³Difference between the actual transmitter frequency and the assigned transmitter frequency.

⁴If the transmitter carrier output power rating is 6 watts or less, the frequency difference during this time period may exceed the maximum frequency difference for this time period.

 t_2 is the time period immediately following t_1 .

 t_3 is the time period from the instant when the transmitter is turned off until $t_{\rm off}$.

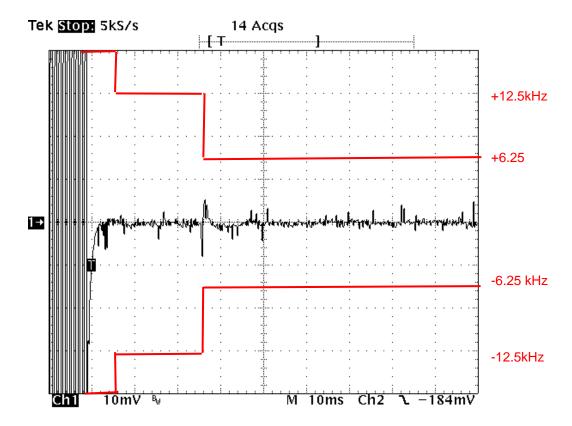
 $t_{\mbox{\tiny off}}$ is the instant when the 1 kHz test signal starts to rise.

- 2 During the time from the end of t_2 to the beginning of t_3 , the frequency difference must not exceed the limits specified in § 90.213.
- 3 Difference between the actual transmitter frequency and the assigned transmitter frequency.
- 4 Since the transmitter carrier output power is less than 6 watts, the frequency difference during the t3 time period may exceed the maximum frequency difference for this time period.

Judgement: Pass

10.6.4 Results for Time Periods t1 and t2

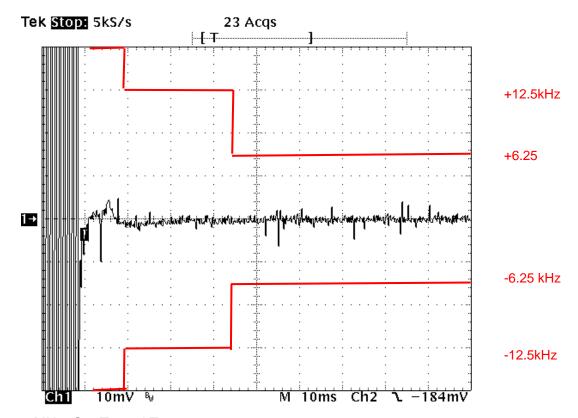
The following shows the off to on State.



162 MHz; On; T1 and T2

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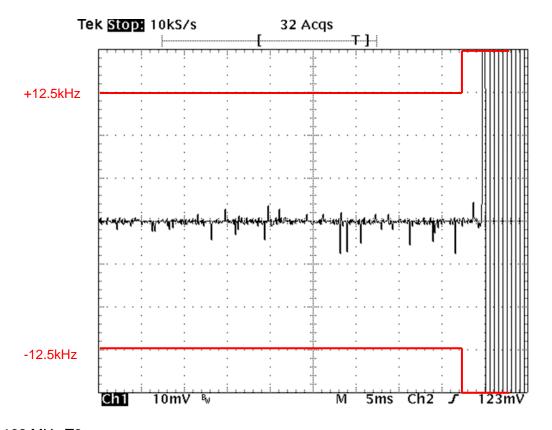
465 MHz; On; T1 and T2 It passed the limits for 12.5 kHz Channel devices, so the 25 kHz device limits are not shown.

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10.6.5 Results for Time Period t3

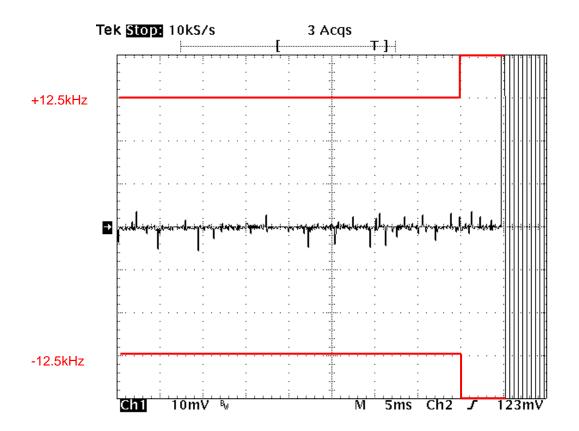
Since the transmitter carrier output power is less than 6 watts, the frequency difference during the t3 time period may exceed the maximum frequency difference for this time period.

The following shows the off to on State.



162 MHz T3

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465 MHz T3 Judgement: Pass

10.7 Radiated Emissions (Receive Mode)

Radiated emission measurements were performed with linearly polarized broadband antennas. The results obtained with these antennas can be correlated with results obtained with a tuned dipole antenna. The radiated emission measurements were performed with a spectrum analyzer. The bandwidth used from 150 kHz to 30 MHz is 9 or 10 kHz and the bandwidth from 30 MHz to 1000 MHz is 100 or 120 kHz. Above 1 GHz, a 1 MHz bandwidth is used. A 10-dB linearity check is performed prior to the start of testing in order to determine if an overload condition exists.

From 30 to 2000 MHz, an Anritsu spectrum analyzer was used. Final radiated emissions measurements were performed inside of an anechoic chamber at a test distance of 3 meters. The anechoic chamber is designated as Chamber E. This Chamber meets the Site Attenuation requirements of ANSI C63.4 and CISPR 16-1. Chamber E is located at 12 East Devonwood Ave. Romeoville, Illinois EMI test lab.

The entire frequency range from 30 to 2000 MHz was slowly scanned with particular attention paid to those frequency ranges which appeared high. Measurements were performed using two antenna polarizations, (vertical and horizontal). The worst-case emissions were recorded. All measurements may be performed using either the peak, average or quasi-peak detector functions. If the peak detector data exceeds or is marginally close to the limits, the measurements are repeated using a quasi-peak detector or average function as required by the specification for final determination of compliance.

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The detected emission levels were maximized by rotating the EUT, adjusting the positions of all cables, and by scanning the measurement antenna from 1 to 4 meters above the ground.

10.7.1 Radiated Emissions Field Strength Sample Calculation

The field strength is calculated by adding the Antenna Factor and Cable Loss, and by subtracting the Amplifier Gain from the measured reading. The basic equation is as follows:

FS = RA + AF + CF - AG

Where: FS = Field Strength

RA = Receiver Amplitude AF = Antenna Factor

CF = Cable Attenuation Factor

AG = Amplifier Gain

10.7.2 Spurious Radiated Emissions Test Results (Receive Mode)

Model	37337-X2	Specification	FCC Part 15 Subpart B			
Serial Number	047	Test Date	February 10, 2023			
Tested by	Chris D'Alessio	Test Distance	3 Meters			
Abbreviations	Pol = Antenna Polarization; V = Vertical; H = Horizontal; P = peak; Q = QP					
Notes	Corr. Factors = Cable Loss – Preamp Gain; Internal preamp below 1 GHz.					
Configuration	Receive Mode					

All emissions except fundamental and harmonics

7 til Cirilodio	Meter		intal a	na nami	Cable &	Dist.			Margin	
Freq.	Reading		Ant.	Ant	Amp	Fact	EUT	Limit	Under	
MHz	dBu√ຶ	Dect.	Pol.	Factor	Factors	dB	dBuV/m	dBuV/m	Limit dB	Note
32.9	14.4	Р	Н	13.0	0.6	0.0	28.0	40.0	12.0	
41.3	10.6	Р	Ι	11.0	0.7	0.0	22.3	40.0	17.7	
55.2	10.9	Р	Ι	9.3	0.8	0.0	21.0	40.0	19.0	
66.9	10.7	Р	Ι	9.3	0.8	0.0	20.8	40.0	19.2	
79.1	10.1	Р	Ι	9.4	1.0	0.0	20.5	40.0	19.5	
90.8	11.4	Р	Τ	9.8	1.0	0.0	22.2	43.5	21.3	
101.5	10.4	Р	Τ	10.4	1.1	0.0	21.9	43.5	21.6	
113.6	11.0	Р	Τ	11.2	1.1	0.0	23.3	43.5	20.2	
124.5	10.8	Р	Τ	11.9	1.2	0.0	23.9	43.5	19.6	
135.7	11.0	Р	Н	12.4	1.3	0.0	24.7	43.5	18.8	
146.1	11.0	Р	Τ	12.7	1.3	0.0	25.0	43.5	18.5	
156.8	10.9	Р	Н	12.9	1.4	0.0	25.2	43.5	18.3	
167.2	10.6	Р	Н	13.2	1.4	0.0	25.2	43.5	18.3	
183.7	11.3	Р	Н	13.7	1.5	0.0	26.5	43.5	17.0	
198.1	13.3	Р	Н	14.3	1.5	0.0	29.1	43.5	14.4	
224.0	13.4	Р	Н	14.9	1.6	0.0	29.9	46.0	16.1	
238.8	12.1	Р	Н	15.2	1.7	0.0	29.0	46.0	17.0	
1098.1	39.4	Р	Н	24.6	-32.0	0.0	32.0	74.0	42.0	1
1253.3	39.6	Р	Н	25.2	-32.0	0.0	32.8	74.0	41.2	1
1582.6	39.7	Р	Н	25.2	-31.5	0.0	33.4	74.0	40.6	1
1843.8	40.1	Р	Н	27.1	-31.3	0.0	35.9	74.0	38.1	1
2055.1	39.4	Р	Н	27.6	-31.0	0.0	36.0	74.0	38.0	1
2202.2	38.6	Р	Н	27.5	-30.8	0.0	35.3	74.0	38.7	1
2506.5	38.7	Р	Н	28.5	-30.4	0.0	36.8	74.0	37.2	1
2884.9	39.5	Р	Н	29.3	-29.7	0.0	39.1	74.0	34.9	1
2985.0	38.7	Р	Н	29.9	-29.5	0.0	39.1	74.0	34.9	1

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	Meter				Cable &	Dist.			Margin	
Freq.	Reading		Ant.	Ant	Amp	Fact	EUT	Limit	Under	
MHz	dBuV	Dect.	Pol.	Factor	Factors	dB	dBuV/m	dBuV/m	Limit dB	Note
35.5	16.3	Р	V	12.2	0.6	0.0	29.1	40.0	10.9	
46.1	17.7	Р	V	10.1	0.7	0.0	28.5	40.0	11.5	
49.9	16.0	Р	V	9.7	0.7	0.0	26.4	40.0	13.6	
63.0	19.1	Р	V	9.3	0.8	0.0	29.2	40.0	10.8	
77.3	11.9	Р	V	9.3	0.9	0.0	22.1	40.0	17.9	
87.5	15.2	Р	V	9.6	1.0	0.0	25.8	40.0	14.2	
97.3	11.0	Р	V	10.1	1.1	0.0	22.2	43.5	21.3	
111.2	10.4	Р	V	11.0	1.1	0.0	22.5	43.5	21.0	
123.8	11.6	Р	V	11.8	1.2	0.0	24.6	43.5	18.9	
133.3	12.1	Р	V	12.3	1.3	0.0	25.7	43.5	17.8	
146.6	11.3	Р	V	12.7	1.3	0.0	25.3	43.5	18.2	
157.0	11.2	Р	V	12.9	1.4	0.0	25.5	43.5	18.0	
170.0	12.4	Р	V	13.2	1.4	0.0	27.0	43.5	16.5	
180.4	12.0	Р	V	13.6	1.5	0.0	27.1	43.5	16.4	
193.0	11.7	Р	V	14.0	1.5	0.0	27.2	43.5	16.3	
216.5	11.7	Р	V	14.8	1.6	0.0	28.1	46.0	17.9	
232.2	11.9	Р	V	15.0	1.7	0.0	28.6	46.0	17.4	
1079.1	40.6	Р	V	24.4	-32.0	0.0	33.0	74.0	41.0	1
1659.7	39.4	Р	V	25.4	-31.5	0.0	33.3	74.0	40.7	1
1952.0	39.2	Р	V	27.6	-31.1	0.0	35.7	74.0	38.3	1
2031.0	41.4	Р	V	27.6	-31.0	0.0	38.0	74.0	36.0	1
2421.4	41.2	Р	V	28.3	-30.5	0.0	39.0	74.0	35.0	1
2585.6	40.1	Р	V	28.7	-30.2	0.0	38.6	74.0	35.4	1
2918.9	39.8	Р	V	29.4	-29.7	0.0	39.5	74.0	34.5	1
2962.0	40.2	Р	V	29.8	-29.6	0.0	40.4	74.0	33.6	1

Note 1: Peak Reading under the Average limit, therefore no Average reading is required. Judgment: Passed by at least 10.8 dB

11.0 MEASUREMENT INSTRUMENTATION UNCERTAINTY

Measurement	Uncertainty
Radiated Emissions, E-field, 3 meters, 30 to 200 MHz	4.7 dB
Radiated Emissions, E-field, 3 meters, 200 to 1000 MHz	6.2 dB
Radiated Emissions, E-field, 3 meters, 1 to 6 GHz	5.0 dB
99% Occupied Bandwidth using REC-43	1% of frequency span
Conducted power PWM-01 at 460 MHz	0.14 dB
Amplitude measurement 1-5000 MHz; REC-11	1.5 dB
Temperature THM-02	0.6 Deg. C

The uncertainties represent expanded uncertainties expressed at approximately the 95% confidence level using a coverage factor of k=2 in accordance with CISPR 16-4-2.

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12.0 REVISION HISTORY

Docur	Document RP-9748A Revisions:						
Rev.	Affected Sections	Description	Rationale				

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