



# FCC PART 15.247 RSS-GEN ISSUE 5, FEBRUARY 2021 AMENDMENT 2 RSS-247, ISSUE 2, FEBRUARY 2017

# TEST REPORT

For

# FCC: VTech Telecommunications Ltd

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# ISEDC: VTECH TELECOMMUNICATIONS LIMITED

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FCC ID: EW780-S113-00 IC: 1135B-80S11300

Report Type:

Original Report

Bluetooth Conference
Speakerphone

**Report Number:** SZ1210608-22172EB

**Report Date:** 2021-07-12

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#### **GENERAL INFORMATION**

#### **Product Description for Equipment under Test (EUT)**

Product	Bluetooth Conference Speakerphone
Tested Model	C300
Multiple Model	VCS601
Model Differences	Refer to the DoS letter
HVIN	35-400336BCS
Frequency Range	BLE: 2402-2480MHz
Maximum Conducted Peak Output Power	BLE: 3.08dBm
Modulation Technique	BLE: GFSK
Antenna Specification*	0dBi (It is provided by the applicant)
Voltage Range	DC3.6V from batteries
Date of Test	2021-06-17 to 2021-07-09
Sample number	SZ1210608-22172E-RF-S_93O(RF Counducted Test) SZ1210608-22172E-RF-S_93N (Radation Emission Test) (Assigned by BACL, Shenzhen)
Received date	2021-06-08
Sample/EUT Status	Good condition

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#### **Objective**

This report is in accordance with Part 2-Subpart J, Part 15-Subparts A and C of the Federal Communication Commission's rules and RSS-GEN Issue 5, February 2021 Amendment 2 and RSS-247, Issue 2, February 2017 of the Innovation, Science and Economic Development Canada rules.

The tests were performed in order to determine compliance with FCC Part 15, Subpart C, and section 15.203, 15.205, 15.207, 15.209 and 15.247 rules.

#### **Test Methodology**

All measurements contained in this report were conducted with ANSI C63.10-2013, American National Standard of Procedures for Compliant Testing of Unlicensed Wireless Devices and RSS-GEN Issue 5, February 2021 Amendment 2 and RSS-247, Issue 2, February 2017.

And KDB 558074 D01 15.247 Meas Guidance v05r02.

All emissions measurement was performed at Bay Area Compliant Laboratories Corp. (Shenzhen). The radiated testing was performed at an antenna-to-EUT distance of 3 meters. Each test item follows test standards and with no deviation.

#### **Measurement Uncertainty**

Parameter		Uncertainty	
Occupied Cha	nnel Bandwidth	±5%	
RF Output Power	with Power meter	±0.73dB	
RF conducted test with spectrum		±1.6dB	
AC Power Lines Conducted Emissions		±1.95dB	
Emissions,	Below 1GHz	±4.75dB	
Radiated	Above 1GHz	±4.88dB	
Temperature		±1℃	
Humidity		±6%	
Supply	voltages	±0.4%	

Note: The extended uncertainty given in this report is obtained by combining the standard uncertainty times the coverage factor K with the 95% confidence interval. Otherwise required by the applicant or Product Regulations, Decision Rule in this report did not consider the uncertainty.

#### **Test Facility**

The test site used by Bay Area Compliant Laboratories Corp. (Shenzhen) to collect test data is located on the 5F(B-West) ,6F,7F,the 3rd Phase of Wan Li Industrial Building D,Shihua Rd, FuTian Free Trade Zone, Shenzhen, China.

The test site has been approved by the FCC under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No.: 342867, the FCC Designation No.: CN1221.

The lab has been recognized by Innovation, Science and Economic Development Canada to test to Canadian radio equipment requirements, the CAB identifier: CN0023.

# **SYSTEM TEST CONFIGURATION**

#### **Description of Test Configuration**

For BLE mode, 40 channels are provided to testing:

Channel	Frequency (MHz)	Channel	Frequency (MHz)
0	2402	20	2442
1	2404	21	2444
2	2406	22	2446
3	2408	23	2448
4	2410	24	2450
5	2412	25	2452
6	2414	26	2454
7	2416	27	2456
8	2418	28	2458
9	2420	29	2460
10	2422	30	2462
11	2424	31	2464
12	2426	32	2466
13	2428	33	2468
14	2430	34	2470
15	2432	35	2472
16	2434	36	2474
17	2436	37	2476
18	2438	38	2478
19	2440	39	2480

EUT was tested with Channel 0, 19 and 39.

#### **Equipment Modifications**

No modification was made to the EUT tested.

#### **EUT Exercise Software**

"UniTool\_5v11" was used for the test and the power level is default. The software and power level was provided by the applicant.

#### **Duty cycle**

Test Result: Pass. Please refer to the Appendix.

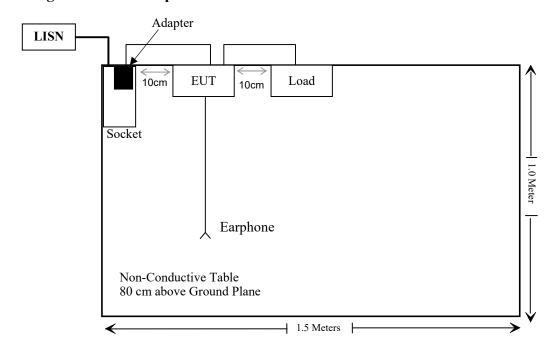
#### **Support Equipment List and Details**

Manufacturer	Description	Model	Serial Number
BULL	Socket	GN-415K	5503290068073
BLU	Adapter	US-CR-2000	US-CR-2000
Unknown	Load	2.5ohm	Baclload001
Unknown	Earphone	Unknown	Baclearphone01

#### **External I/O Cable**

Cable Description	Length (m)	From Port	То
Un-shielded Un-detachable AC Cable	1.0	Socket	LISN
Un-shielded Detachable USB Cable	1.0	EUT	Adapter
Un-shielded Un-detachable USB Cable	0.2	EUT	Load
Un-shielded Detachable Audio Cable	1.5	EUT	Earphone

#### **Block Diagram of Test Setup**



# SUMMARY OF TEST RESULTS

FCC Rules	ISEDC Rules	Description of Test	Result
§15.247 (i), §2.1091	RSS-102 § 2.5.2	Maximum Permissible Exposure(MPE)& Exemption Limits for Routine Evaluation – RF Exposure Evaluation	Compliant
§15.203	RSS-Gen §6.8	Antenna Requirement	Compliant
§15.207 (a)	RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
§15.205, §15.209, §15.247(d)	RSS-GEN § 8.10 & RSS-247 § 5.5	Spurious Emissions	Compliant
§15.247 (a)(2)	RSS- Gen§6.7 RSS-247 § 5.2 (a)	99% Occupied Bandwidth & 6 dB Emission Bandwidth	Compliant
§15.247(b)(3)	RSS-247 § 5.4(d)	Maximum Conducted Output Power	Compliant
§15.247(d)	RSS-247 § 5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
§15.247(e)	RSS-247 § 5.2 (b)	Power Spectral Density	Compliant

# TEST EQUIPMENT LIST

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
	Condu	cted Emissions	Test		
Rohde & Schwarz	EMI Test Receiver	ESCI	101120	2020/08/04	2021/08/03
Rohde & Schwarz	LISN	ENV216	101613	2020/08/04	2021/08/03
Rohde & Schwarz	Transient Limitor	ESH3Z2	DE25985	2020/11/29	2021/11/28
Unknown	CE Cable	CE Cable	UF A210B-1- 0720-504504	2020/11/29	2021/11/28
Rohde & Schwarz	CE Test software	EMC 32	V8.53.0	NCR	NCR
	Radia	ated Emission T	est		
R&S	EMI Test Receiver	ESR3	102455	2020/08/04	2021/08/03
Sonoma instrument	Pre-amplifier	310 N	186238	2020/08/04	2021/08/03
Sunol Sciences	Broadband Antenna	JB1	A040904-2	2020/12/22	2023/12/21
Unknown	Cable 2	RF Cable 2	F-03-EM197	2020/11/29	2021/11/28
Unknown	Cable	Chamber Cable 1	F-03-EM236	2020/11/29	2021/11/28
Rohde & Schwarz	Auto test software	EMC 32	V9.10	NCR	NCR
Rohde & Schwarz	Spectrum Analyzer	FSV40-N	102259	2020/08/04	2021/08/03
COM-POWER	Pre-amplifier	PA-122	181919	2020/11/29	2021/11/28
Quinstar	Amplifier	QLW- 18405536-J0	15964001002	2020/11/28	2021/11/27
Sunol Sciences	Horn Antenna	3115	9107-3694	2021/01/15	2024/01/14
Insulted Wire Inc.	RF Cable	SPS-2503- 3150	02222010	2020/11/29	2021/11/28
Unknown	RF Cable	W1101-EQ1 OUT	F-19-EM005	2020/11/29	2021/11/28
SNSD	Band Reject filter	BSF2402- 2480MN- 0898-001	2.4G filter	2021/04/20	2022/04/20
Ducommun Technolagies	Horn antenna	ARH-4223- 02	1007726-02 1304	2020/12/06	2023/12/05
RF Conducted Test					
Tonscend Corporation	RF control Unit	JS0806-2	19D8060154	2021/07/06	2022/07/05
Rohde & Schwarz	Signal and Spectrum Analyzer	FSV40	101473	2021/07/06	2022/07/05
Unknown	Cable 2	RF Cable 2	F-03-EM197	2020/11/29	2021/11/28

<sup>\*</sup> Statement of Traceability: Bay Area Compliant Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to requirements that traceable to National Primary Standards and International System of Units (SI).

### FCC §15.247 (i) & §2.1091- MAXIMUM PERMISSIBLE EXPOSURE (MPE)

#### **Applicable Standard**

According to subpart 15.247 (i) and subpart 2.1091 systems operating under the provisions of this section shall be operated in a manner that ensures the public is not exposed to RF energy level in excess of the communication guidelines.

Limits for General Population/Uncontrolled Exposure

Limits for General Population/Uncontrolled Exposure						
Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm²)	Averaging Time (Minutes)		
0.3-1.34	614	1.63	*(100)	30		
1.34-30	824/f	2.19/f	$*(180/f^2)$	30		
30-300	27.5	0.073	0.2	30		
300-1500	/	/	f/1500	30		
1500-100,000	/	/	1.0	30		

f = frequency in MHz

#### Result

#### **Calculated Formulary:**

Predication of MPE limit at a given distance

$$S = \frac{PG}{4\pi R^2}$$

S = power density (in appropriate units, e.g. mW/cm<sup>2</sup>)

P = power input to the antenna (in appropriate units, e.g., mW).

G = power gain of the antenna in the direction of interest relative to an isotropic radiator, the power gain factor, is normally numeric gain.

R = distance to the center of radiation of the antenna (appropriate units, e.g., cm)

Frequency	Antenna Gain		-	conducted wer	Evaluation Distance	Power Density	MPE Limit
(MHz)	(dBi)	(numeric)	(dBm)	(mW)	(cm)	$(mW/cm^2)$	(mW/cm <sup>2</sup> )
2402-2480	0	1.0	3.5	2.24	20	0.0004	1

**Result: Compliance** 

<sup>\* =</sup> Plane-wave equivalent power density

# RSS-102 § 2.5.2 –EXEMPTION LIMITS FOR ROUTINE EVALUATION-RF EXPOSURE EVALUATION

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#### **Applicable Standard**

According to RSS-102 § (2.5.2):

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $4.49/f^{0.5}$  W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $1.31 \times 10^{-2} f^{0.6834}$  W (adjusted for tune-up tolerance), where f is in MHz; at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance). In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

#### **Calculated Data:**

The maximum tune-up conducted output power is 3.5 dBm, antenna gain is 0dBi. So the maximum e.i.r.p. of the device is 3.5dBm + 0dBi = 3.5dBm = 0.002W

The worst case is f = 2402 MHz: The limit is  $1.31 \times 10^{-2} f^{0.6834} \text{ W} = 2.68 \text{W}$ 

0.002W<2.68W

So the RF Exposure evaluation can be exempted.

### §15.203 & RSS-Gen §6.8 ANTENNA REQUIREMENT

#### **Applicable Standard**

According to § 15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the user of a standard antenna jack or electrical connector is prohibited. The structure and application of the EUT were analyzed to determine compliance with section §15.203 of the rules. §15.203 state that the subject device must meet the following criteria:

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- a. Antenna must be permanently attached to the unit.
- b. Antenna must use a unique type of connector to attach to the EUT.

Unit must be professionally installed, and installer shall be responsible for verifying that the correct antenna is employed with the unit.

And according to FCC 47 CFR section 15.247 (b), if the transmitting antennas of directional gain greater than 6dBi are used, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For licence-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device's ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device. Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

#### **Antenna Connector Construction**

The EUT has an integral antenna arrangement for BLE which was permanently attached and the antenna gain is 0 dBi, fulfill the requirement of this section. Please refer to the EUT photos.

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Туре	Antenna Gain	Impedance
РСВ	0 dBi	50 Ω

**Result: Compliant** 

### § 15.207 (a) & RSS-GEN §8.8 AC LINE CONDUCTED EMISSIONS

#### **Applicable Standard**

FCC§15.207

Unless stated otherwise in the applicable RSS, for radio apparatus that are designed to be connected to the public utility AC power network, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the range 150 kHz to 30 MHz shall not exceed the limits in table 4, as measured using a 50  $\mu H$  / 50  $\Omega$  line impedance stabilization network. This requirement applies for the radio frequency voltage measured between each power line and the ground terminal of each AC power-line mains cable of the EUT.

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For an EUT that connects to the AC power lines indirectly, through another device, the requirement for compliance with the limits in table 4 shall apply at the terminals of the AC power-line mains cable of a representative support device, while it provides power to the EUT. The lower limit applies at the boundary between the frequency ranges. The device used to power the EUT shall be representative of typical applications.

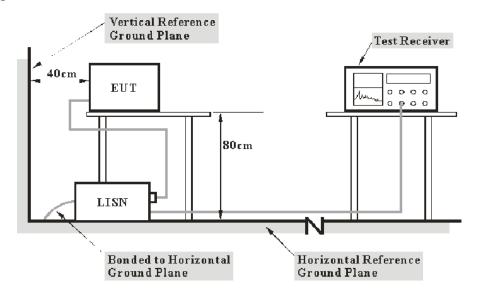
Table 4 - AC Power Lines Conducted Emission Limits				
Frequency range Conducted limit (dBµV)				
(MHz)	Quasi-Peak	Average		
0.15 - 0.5	66 to 56 <sup>1</sup>	56 to 46 <sup>1</sup>		
0.5 - 5	56	46		
5 – 30	60	50		

**Note 1:** The level decreases linearly with the logarithm of the frequency.

For an EUT with a permanent or detachable antenna operating between 150 kHz and 30 MHz, the AC power-line conducted emissions must be measured using the following configurations:

- (a) Perform the AC power-line conducted emissions test with the antenna connected to determine compliance with the limits of table 4 outside the transmitter's fundamental emission band.
- (b) Retest with a dummy load instead of the antenna to determine compliance with the limits of table 4 within the transmitter's fundamental emission band. For a detachable antenna, remove the antenna and connect a suitable dummy load to the antenna connector. For a permanent antenna, remove the antenna and terminate the RF output with a dummy load or network that simulates the antenna in the fundamental frequency band.

#### **EUT Setup**



Note: 1. Support units were connected to second LISN.

2. Both of LISNs (AMN) 80 cm from EUT and at the least 80 cm from other units and other metal planes support units.

The setup of EUT is according with per ANSI C63.10-2013 measurement procedure. The specification used was with the FCC Part 15.207 & RSS-247/RSS-Gen limits.

The spacing between the peripherals was 10 cm.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

#### **EMI Test Receiver Setup**

The EMI test receiver was set to investigate the spectrum from 150 kHz to 30 MHz.

During the conducted emission test, the EMI test receiver was set with the following configurations:

Frequency Range	IF B/W			
150 kHz – 30 MHz	9 kHz			

#### **Test Procedure**

During the conducted emission test, the adapter was connected to the outlet of the LISN.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All final data was recorded in the Quasi-peak and average detection mode.

#### **Corrected Factor & Margin Calculation**

The Corrected factor is calculated by adding LISN VDF (Voltage Division Factor), Cable Loss and Transient Limiter Attenuation. The basic equation is as follows:

Correction Factor = LISN VDF + Cable Loss + Transient Limiter Attenuation

The "Margin" column of the following data tables indicates the degree of compliance with the applicable limit. For example, a margin of 7 dB means the emission is 7 dB below the limit. The equation for margin calculation is as follows:

Margin = Limit – Corrected Amplitude

#### **Test Data**

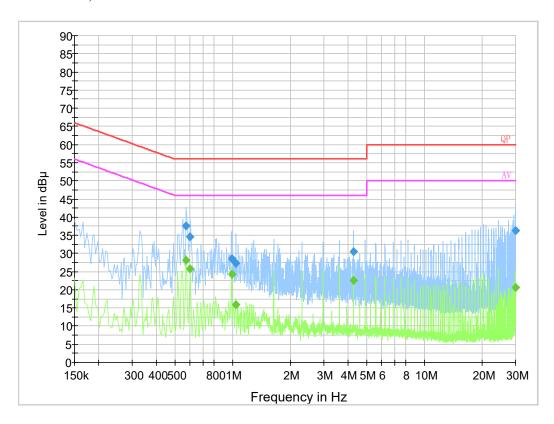
#### **Environmental Conditions**

Temperature:	26 ℃
Relative Humidity:	67 %
ATM Pressure:	101.0 kPa

The testing was performed by Haiguo Li on 2021-06-18.

EUT operation mode: Transmitting

#### AC 120V/60 Hz, Line



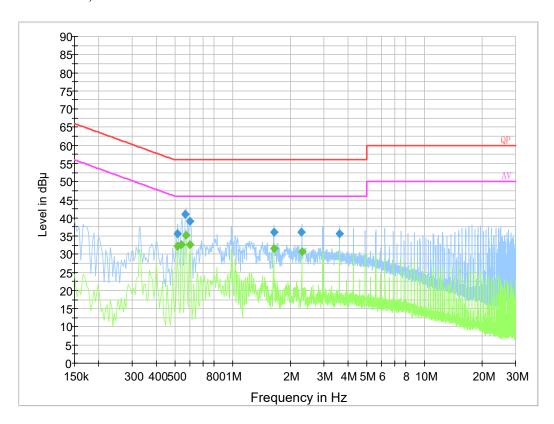
#### **Final Result 1**

	• • • •					
Frequency	QuasiPeak	Bandwidth	Line	Corr.	Margin	Limit
(MHz)	(dB µ V)	(kHz)		(dB)	(dB)	(dB μ V)
0.573390	37.6	9.000	L1	19.8	18.4	56.0
0.600970	34.6	9.000	L1	19.8	21.4	56.0
0.991150	28.6	9.000	L1	19.9	27.4	56.0
1.038370	27.4	9.000	L1	19.9	28.6	56.0
4.269830	30.5	9.000	L1	19.9	25.5	56.0
29.925050	36.3	9.000	L1	20.2	23.7	60.0

# Final Result 2

Frequency (MHz)	Average (dB µ V)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dB µ V)
0.573390	28.1	9.000	L1	19.8	17.9	46.0
0.600970	25.7	9.000	L1	19.8	20.3	46.0
0.991150	24.2	9.000	L1	19.9	21.8	46.0
1.038370	16.0	9.000	L1	19.9	30.0	46.0
4.269830	22.6	9.000	L1	19.9	23.4	46.0
29.925050	20.6	9.000	L1	20.2	29.4	50.0

#### AC 120V/60 Hz, Neutral



#### **Final Result 1**

Frequency	QuasiPeak	Bandwidth	Line	Corr.	Margin	Limit
(MHz)	(dB µ V)	(kHz)		(dB)	(dB)	(dB µ V)
0.518230	35.6	9.000	N	19.8	20.4	56.0
0.569390	41.1	9.000	N	19.8	14.9	56.0
0.600970	39.1	9.000	N	19.8	16.9	56.0
1.645310	36.1	9.000	N	19.8	19.9	56.0
2.295470	36.0	9.000	N	19.8	20.0	56.0
3.611730	35.8	9.000	N	19.9	20.2	56.0

#### Final Result 2

Frequency (MHz)	Average (dB μ V)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dB µ V)
0.514000	32.2	9.000	N	19.8	13.8	46.0
0.542000	32.7	9.000	N	19.8	13.3	46.0
0.574000	35.3	9.000	N	19.8	10.7	46.0
0.602000	32.7	9.000	N	19.8	13.3	46.0
1.646000	31.5	9.000	N	19.8	14.5	46.0
2.302000	30.6	9.000	N	19.8	15.4	46.0

# §15.205, §15.209, §15.247(d) & RSS-GEN § 8.10 & RSS-247 § 5.5 SPURIOUS EMISSIONS

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#### **Applicable Standard**

FCC §15.247 (d); §15.209; §15.205;

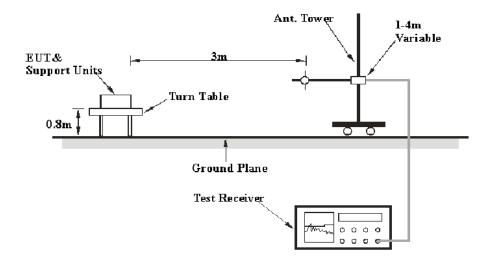
According to RSS-GEN § 8.10 & RSS-247 § 5.5

Restricted frequency bands, identified in table 7, are designated primarily for safety-of-life services (distress calling and certain aeronautical activities), certain satellite downlinks, radio astronomy and some government uses. Except where otherwise indicated, the following conditions related to the restricted frequency bands apply:(a) The transmit frequency, including fundamental components of modulation, of licence-exempt radio apparatus shall not fall within the restricted frequency bands listed in table 7 except for apparatus compliant with RSS-287, Emergency Position Indicating Radio Beacons (EPIRB), Emergency Locator Transmitters (ELT), Personal Locator Beacons (PLB), and Maritime Survivor Locator Devices (MSLD).(b) Unwanted emissions that fall into restricted frequency bands listed in table 7 shall comply with the limits specified in table 5 and table 6.(c) Unwanted emissions that do not fall within the restricted frequency bands listed in table 5 and table 6.

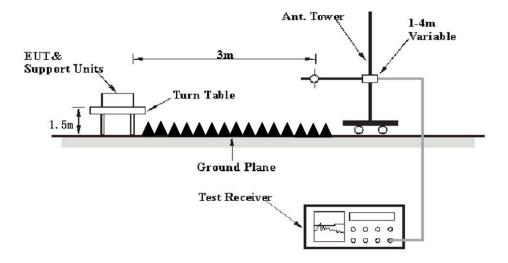
In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 5.4(d), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

#### **EUT Setup**

#### **Below 1 GHz:**



#### **Above 1GHz:**



The radiated emission tests were performed in the 3 meters test site, using the setup accordance with the ANSI C63.10-2013 & RSS-Gen. The specification used was the FCC 15.209, and FCC 15.247 & RSS-Gen limits.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

#### EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 25 GHz.

During the radiated emission test, the EMI test receiver & Spectrum Analyzer Setup were set with the following configurations:

Frequency Range	RBW	Video B/W	IF B/W	Measurement
30 MHz – 1000 MHz	100 kHz	300 kHz	120 kHz	QP
	1MHz	3 MHz	/	PK
Above 1 GHz	1MHz	10 Hz Note 1	/	Average
	1MHz	>1/T Note 2	/	Average

Note 1: when duty cycle is no less than 98% Note 2: when duty cycle is less than 98%

#### **Test Procedure**

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

Data was recorded in Quasi-peak detection mode for frequency range of 30 MHz-1 GHz, peak and Average detection modes for frequencies above 1 GHz.

Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.

Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.

Repeat above procedures until all measured frequencies were complete.

#### **Corrected Amplitude & Margin Calculation**

The Corrected Amplitude is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain from the Meter Reading. The basic equation is as follows:

Corrected Amplitude = Meter Reading + Antenna Factor + Cable Loss - Amplifier Gain

The "Margin" column of the following data tables indicates the degree of compliance with the applicable limit. For example, a margin of 7dB means the emission is 7dB below the limit. The equation for margin calculation is as follows:

Margin = Limit – Corrected Amplitude

#### **Test Data**

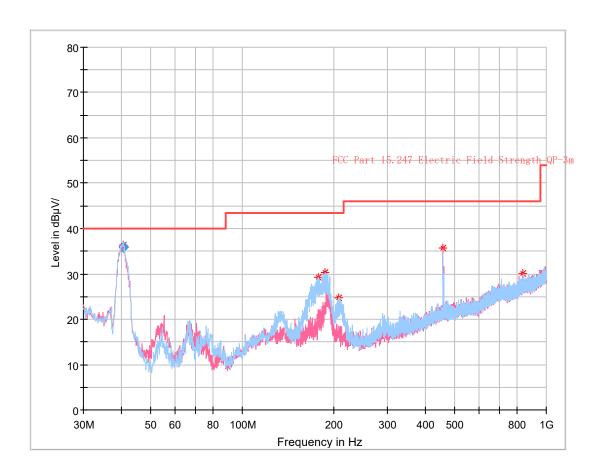
#### **Environmental Conditions**

Temperature:	26.5~30°C
Relative Humidity:	51~52 %
ATM Pressure:	101.0kPa

The testing was performed by William Wang on 2021-06-17 for below 1GHz and by Alan He on 2021-06-28 for above 1GHz

EUT operation mode: Transmitting

#### 30 MHz~1 GHz:



# Final\_Result

Frequency	QuasiPeak	Limit	Margin	Height	Pol	Azimuth	Corr.
(MHz)	(dB $\mu$ V/m)	(dB µ V/m)	(dB)	(cm)		(deg)	(dB)
40.495250	35.89	40.00	4.11	141.0	H	343.0	-10.7

Critical\_Freqs

Frequency (MHz)	MaxPeak (dB µ V/m)	Limit (dB µ V/m)	Margin (dB)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB)
177.803750	29.28	43.50	14.22	200.0	Н	239.0	-12.2
187.746250	30.32	43.50	13.18	200.0	Н	239.0	-12.3
207.873750	24.82	43.50	18.68	200.0	Н	270.0	-11.2
457.527500	35.74	46.00	10.26	100.0	٧	0.0	-5.5
837.282500	30.04	46.00	15.96	100.0	٧	238.0	0.0

#### 1 GHz-25 GHz:

D	Re	eceiver	TD 4 1 1	Rx An	itenna	Corrected	Corrected	T,	3.6
Frequency (MHz)	Reading (dBµV)	PK/QP/Ave.	Turntable Degree	Height (m)		Factor (dB/m)	Amplitude (dBµV/m)	Limit (dBµV/m)	Margin (dB)
			Low Ch	nannel (2	2402 MI	Hz)			
2327.31	29.18	PK	176	2.3	Н	31.64	60.82	74	13.18
2327.31	16.84	Ave.	176	2.3	Н	31.64	48.48	54	5.52
2492.73	29.28	PK	171	1.8	Н	32.13	61.41	74	12.59
2492.73	17.08	Ave.	171	1.8	Н	32.13	49.21	54	4.79
4804.00	49.69	PK	292	1.2	Н	5.40	55.09	74	18.91
4804.00	44.41	Ave.	292	1.2	Н	5.40	49.81	54	4.19
7206.00	43.63	PK	202	1.7	Н	12.02	55.65	74	18.35
7206.00	33.33	Ave.	202	1.7	Н	12.02	45.35	54	8.65
	Middle Channel (2440 MHz)								
4880.00	49.43	PK	217	2.0	Н	6.43	55.86	74	18.14
4880.00	43.93	Ave.	217	2.0	Н	6.43	50.36	54	3.64
7320.00	45.98	PK	20	1.9	Н	11.17	57.15	74	16.85
7320.00	37.64	Ave.	20	1.9	Н	11.17	48.81	54	5.19
			High Cl	nannel (2	2480 M	Hz)			
2373.73	28.94	PK	315	2.4	Н	31.87	60.81	74	13.19
2373.73	16.82	Ave.	315	2.4	Н	31.87	48.69	54	5.31
2483.54	36.89	PK	291	2.4	Н	32.13	69.02	74	4.98
2483.54	20.88	Ave.	291	2.4	Н	32.13	53.01	54	0.99
4960.00	48.42	PK	260	1.6	Н	6.95	55.37	74	18.63
4960.00	43.50	Ave.	260	1.6	Н	6.95	50.45	54	3.55
7440.00	45.87	PK	2	2.3	Н	12.31	58.18	74	15.82
7440.00	38.89	Ave.	2	2.3	Н	12.31	51.20	54	2.80

#### Note:

Corrected Factor = Antenna factor (RX) + Cable Loss – Amplifier Factor

Corrected Amplitude = Corrected Factor + Reading

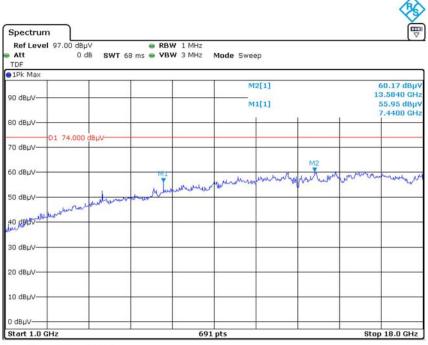
Margin = Limit - Corrected. Amplitude

The other spurious emission which is 20dB to the limit was not recorded.

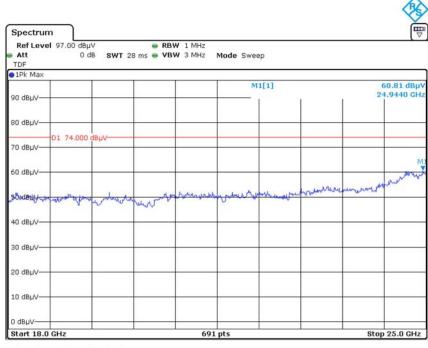
#### Pre-scan with High channel Peak

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#### Horizontal



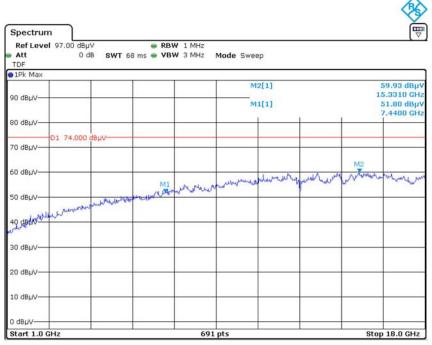
Date: 28.JUN.2021 15:00:05



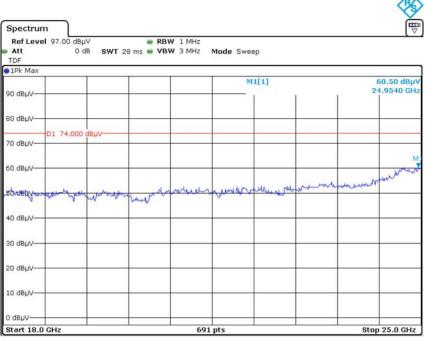
Date: 28.JUN.2021 15:45:16

#### Vertical

Report No.: SZ1210608-22172EB



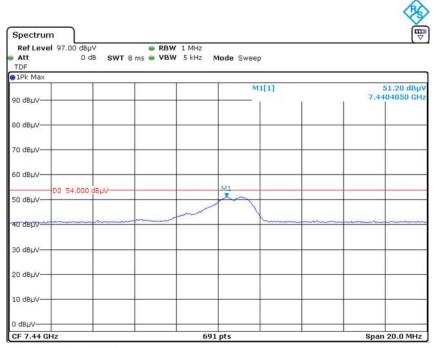
Date: 28.JUN.2021 15:10:38



Date: 28.JUN.2021 15:54:51

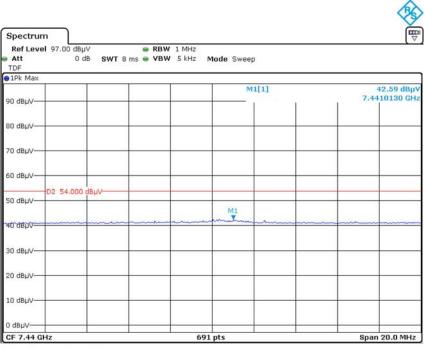
#### Average Horizontal

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Date: 28.JUN.2021 15:05:10

#### Vertical



Date: 28.JUN.2021 15:15:32

# §15.247 (a)(2) & RSS-Gen§6.7 RSS-247 § 5.2 (a) 99% OCCUPIED BANDWIDTH & 6 dB EMISSION BANDWIDTH

#### **Applicable Standard**

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.

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The occupied bandwidth or the "99% emission bandwidth" is defined as the frequency range between two points, one above and the other below the carrier frequency, within which 99% of the total transmitted power of the fundamental transmitted emission is contained. The occupied bandwidth shall be reported for all equipment in addition to the specified bandwidth required in the applicable RSSs.

In some cases, the "6 dB bandwidth" is required, which is defined as the frequency range between two points, one at the lowest frequency below and one at the highest frequency above the carrier frequency, at which the maximum power level of the transmitted emission is attenuated 6 dB below the maximum inband power level of the modulated signal, where the two points are on the outskirts of the in-band emission.

#### **Test Procedure**

- 1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
- 2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect it to measurement instrument. Then set it to any one convenient frequency within its operating range. Set a reference level on the measuring instrument equal to the highest peak value.
- 3. Measure the frequency difference of two frequencies that were attenuated 6 dB from the reference level. Record the frequency difference as the emission bandwidth.
- 4. Repeat above procedures until all frequencies measured were complete.

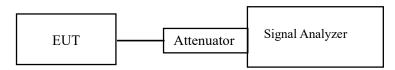
The following conditions shall be observed for measuring the occupied bandwidth and 6 dB bandwidth:

- The transmitter shall be operated at its maximum carrier power measured under normal test conditions.
- The span of the spectrum analyzer shall be set large enough to capture all products of the modulation process, including the emission skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.
- The detector of the spectrum analyzer shall be set to "Sample". However, a peak, or peak hold, may be used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement). Use of a peak hold (or "Max Hold") may be necessary to determine the occupied / 6 dB bandwidth if the device is not transmitting continuously.
- $\bullet$  The resolution bandwidth (RBW) shall be in the range of 1% to 5% of the actual occupied / 6 dB bandwidth and the video bandwidth (VBW) shall not be smaller than three times the RBW value. Video averaging is not permitted.

Note: It may be necessary to repeat the measurement a few times until the RBW and VBW are in compliance with the above requirement.

For the 99% emission bandwidth, the trace data points are recovered and directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed

in a running sum until 0.5% of the total is reached, and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded. The difference between the two recorded frequencies is the occupied bandwidth (or the 99% emission bandwidth).



#### **Test Data**

#### **Environmental Conditions**

Temperature:	28.9 ℃
Relative Humidity:	54 %
ATM Pressure:	101.0 kPa

The testing was performed by Blaker Zhang on 2021-07-09.

EUT operation mode: Transmitting

**Test Result: Pass** 

Please refer to the Appendix.

# §15.247(b)(3) & RSS-247 § 5.4(d) MAXIMUM CONDUCTED OUTPUT POWER

#### Applicable Standard

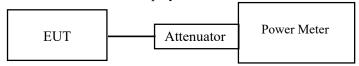
According to FCC §15.247(b) (3), for systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

#### Test Procedure

- 1. Place the EUT on a bench and set it in transmitting mode.
- 2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to one test equipment.
- 3. Add a correction factor to the display.



#### **Test Data**

#### **Environmental Conditions**

Temperature:	28.9 ℃
Relative Humidity:	54 %
ATM Pressure:	101.0 kPa

The testing was performed by Blaker Zhang on 2021-07-09.

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EUT operation mode: Transmitting

**Test Result: Pass** 

Please refer to the Appendix.

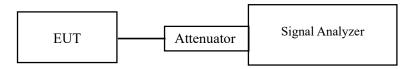
# § 15.247(d) & RSS-247 § 5.5 100 kHz BANDWIDTH OF FREQUENCY BAND EDGE

#### **Applicable Standard**

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)).

#### **Test Procedure**

- 1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
- 2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect its antenna terminal to measurement instrument via a low loss cable. Then set it to any one measured frequency within its operating range, and make sure the instrument is operated in its linear range.
- 3. Set RBW to 100 kHz and VBW of spectrum analyzer to 300 kHz with a convenient frequency span including 100 kHz bandwidth from band edge.
- 4. Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.
- 5. Repeat above procedures until all measured frequencies were complete.



#### **Test Data**

#### **Environmental Conditions**

Temperature:	28.9 °C
Relative Humidity:	54 %
ATM Pressure:	101.0 kPa

The testing was performed by Blaker Zhang on 2021-07-09.

EUT operation mode: Transmitting

**Test Result: Pass** 

Please refer to the Appendix.

### §15.247(e) & RSS-247 § 5.2 (b) POWER SPECTRAL DENSITY

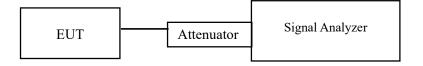
#### **Applicable Standard**

For digitally modulated systems, the 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. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

#### **Test Procedure**

- 1. Use this procedure when the maximum peak conducted output power in the fundamental emission is used to demonstrate compliance.
- 2. Set the RBW to: 3kHz≤ RBW≤100 kHz.
- 3. Set the VBW  $\geq$  3×RBW.
- 4. Set the span to 1.5 times the DTS bandwidth.
- 5. Detector = peak.
- 6. Sweep time = auto couple.
- 7. Trace mode = max hold.
- 8. Allow trace to fully stabilize.
- 9. Use the peak marker function to determine the maximum amplitude level within the RBW.
- 10. If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.



#### **Test Data**

#### **Environmental Conditions**

Temperature:	28.9 °C
Relative Humidity:	54 %
ATM Pressure:	101.0 kPa

The testing was performed by Blaker Zhang on 2021-07-09.

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EUT operation mode: Transmitting

**Test Result: Pass** 

Please refer to the Appendix.

# **APPENDIX**

# Appendix A: DTS Bandwidth

#### **Test Result**

Test Mode	Antenna	Channel	DTS BW [MHz]	Limit[MHz]	Verdict
BLE Ant1		2402	0.652	0.5	PASS
	2440	0.664	0.5	PASS	
		2480	0.656	0.5	PASS

**Test Graphs** BLE\_Ant1\_2402 Ref Level 20.00 dBm
Att 20 dB
Count 100/100

1Pk View Offset 15.51 dB • RBW 100 kHz SWT 18.9 µs • VBW 300 kHz Mode Auto FFT M1[1] -10 dBr -30 dB 40 dB -50 dB 
 Type
 Ref
 Trc

 M1
 1

 M2
 1

 D3
 M1
 1
 Function **Function Result** Date: 9.JUL.2021 00:31:47 BLE\_Ant1\_2440 Ref Level 20.00 dBm Offset 15.24 dB • RBW 100 kHz SWT 18.9 µs • VBW 300 kHz Count 100/100 • 1Pk View Mode Auto FFT M1[1] 1.44 de 01 -4.563 -10 dBr 20 dB Y-value -4.73 dBm 1.44 dBm -0.06 dB Function **Function Result** Date: 9.JUL.2021 00:40:40 BLE\_Ant1\_2480 Spectrum

Ref Level 20.00 dBm

Att 20 dB

Count 100/100

1Pk View Mode Auto FFT

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Y-value -4.74 dBm 1.38 dBm -0.07 dB

Function

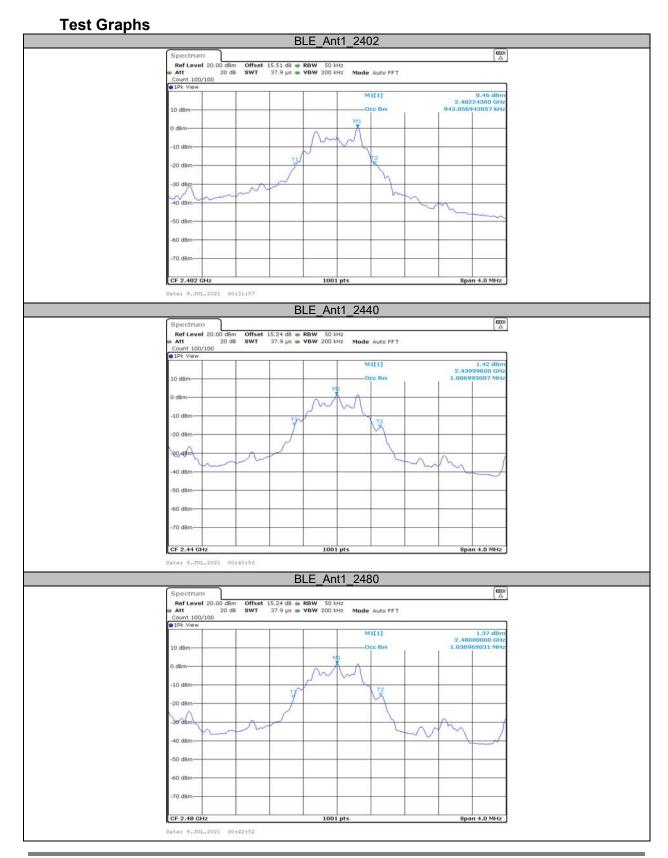
**Function Result** 

Date: 9.JUL.2021 00:42:42

# **Appendix B: Occupied Channel Bandwidth**

#### **Test Result**

Test Mode	Antenna	Channel	OCB [MHz]	Limit[MHz]	Verdict
		2402	0.943		PASS
BLE	Ant1	2440	1.007		PASS
		2480	1.031		PASS



# Appendix C: Maximum conducted Peak output power

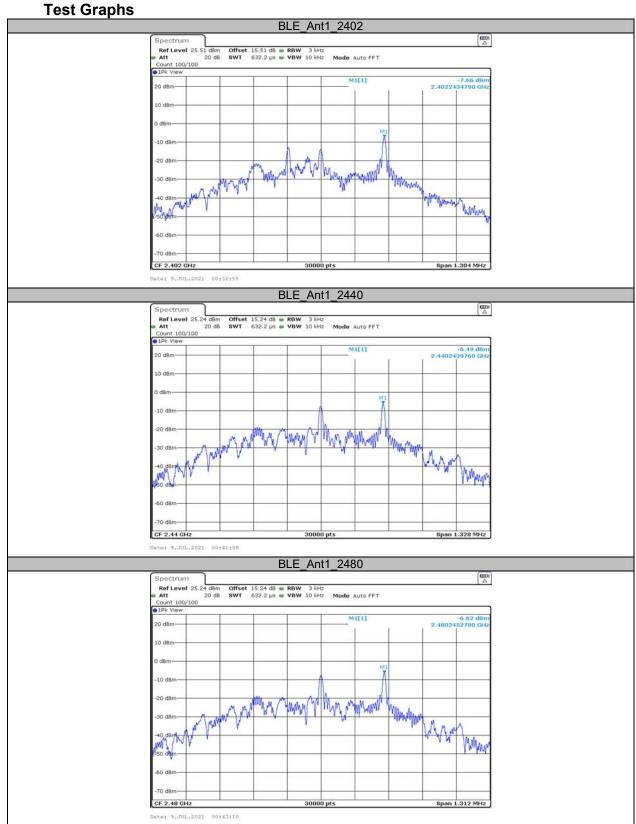
#### **Test Result**

Test Mode	Antenna	Channel	Result[dBm]	Limit[dBm]	Verdict
		2402	1.67	<=30	PASS
BLE	Ant1	2440	3.08	<=30	PASS
		2480	2.96	<=30	PASS

# Appendix D: Maximum power spectral density

#### **Test Result**

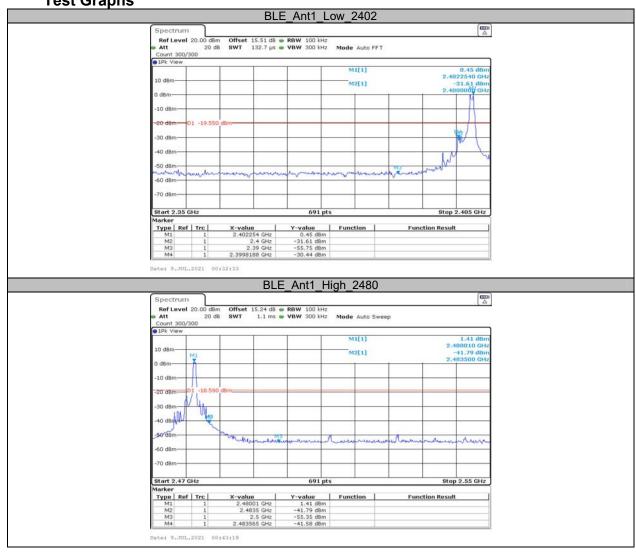
Test Mode	Antenna	Channel	Result[dBm/3kHz]	Limit[dBm/3kHz]	Verdict
		2402	-7.66	<=8	PASS
BLE	Ant1	2440	-6.49	<=8	PASS
		2480	-6.62	<=8	PASS



#### **Appendix E: Band edge measurements**

#### **Test Result**

**Test Graphs** 

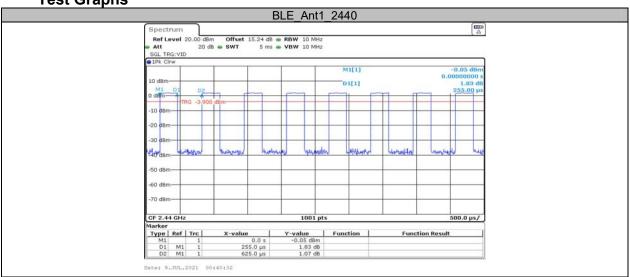


### Appendix F: Duty Cycle Test Result

Test Mode	Antenna	Channel	Transmission Duration	Transmission Period	Duty Cycle [%]
BLE	Ant1	2440	[ms] 0.26	[ms] 0.63	41.27

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**Test Graphs** 



\*\*\*\*\* END OF REPORT \*\*\*\*\*