

**FCC Part 15.247**  
**RSS-GEN, ISSUE 5, February 2021 Amendment 2**  
**RSS-247, ISSUE 2, February 2017**  
**TEST REPORT**

For

**Tractive GmbH**

Poststrasse 4 ,Pasching, 4061 Austria

**FCC ID: 2AVE6TG5**  
**IC: 25970-TG5**

|   |   |
|---|---|
| <b>Report Type:</b><br>Original Report  | <b>Product Type:</b><br>Tractive CAT mini |
| <b>Report Producer :</b> <u>Jojo Lu</u>   |   |
| <b>Report Number :</b> <u>RXZ230110032RF02</u>  |   |
| <b>Report Date :</b> <u>2023-04-11</u>  |   |
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Revision History

| Revision | No.          | Report Number    | Issue Date | Description     | Author/<br>Revised by |
|----------|--------------|------------------|------------|-----------------|-----------------------|
| 0.0      | RXZ230110032 | RXZ230110032RF02 | 2023-04-11 | Original Report | Jojo Lu               |

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# 1 General Information

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

|                                    |  |
|------------------------------------|--|
| Applicant                          | Tractive GmbH  |
|                                    | Poststrasse 4 ,Pasching, 4061 Austria  |
| Manufacturer                       | Tractive GmbH  |
|                                    | Poststrasse 4 ,Pasching, 4061 Austria  |
| Brand(Trade) Name                  | N/A  |
| Product (Equipment)                | Tractive CAT mini  |
| Main Model Name (HVIN)             | TG5  |
| Frequency Range                    | IEEE 802.11b Mode: 2412 ~ 2462 MHz<br>BLE (1M) Mode: 2402 ~ 2480 MHz   |
| Transmit Power                     | IEEE 802.11b Mode: 8.56 dBm<br>BLE (1M) Mode: -5.83 dBm  |
| Modulation Technique               | IEEE 802.11b Mode: DSSS<br>BLE (1M) Mode: GFSK   |
| Power Operation<br>(Voltage Range) | <input checked="" type="checkbox"/> AC<br><input checked="" type="checkbox"/> Adapter<br><input type="checkbox"/> By AC Power Cord<br><input type="checkbox"/> PoE   |
|                                    | <input checked="" type="checkbox"/> DC Type<br><input checked="" type="checkbox"/> Battery 3.8Vdc<br>Brand Name: Tractive GmbH<br>Model: HI9213380677<br><input type="checkbox"/> DC Power Supply<br><input checked="" type="checkbox"/> External from USB Cable<br><input type="checkbox"/> External DC Adapter |
|                                    | <input type="checkbox"/> Host System   |
| Received Date                      | 2023/01/10   |
| Date of Test                       | 2023/01/10~2023/01/13  |

\*All measurement and test data in this report was gathered from production sample serial number: RXZ230110032 Assigned by BACL, New Taipei Laboratory.

## 1.2 Objective

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

## 1.3 Test Methodology

All measurements contained in this report were conducted with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and KDB 558074 D01 15.247 Meas Guidance v05r02. And RSS-247, Issue 2, February 2017, RSSGen, Issue 5, February 2021 Amendment 2 of the Innovation, Science and Economic Development Canada.

## 1.4 Statement

Decision Rule: No, (The test results do not include MU judgment)

It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. (New Taipei Laboratory).

Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.

Unless otherwise stated the results shown in this test report refer only to the sample(s) tested.

The determination of the test results does not require consideration of the uncertainty of the measurement, unless the assessment is required by customer agreement, regulation or standard document specification.

Bay Area Compliance Laboratories Corp. (New Taipei Laboratory) is not responsible for the authenticity of the information provided by the applicant that affects the test results.

**1.5 Measurement Uncertainty**

| Parameter                     |               | Uncertainty  |
|-------------------------------|---------------|--------------|
| RF output power, conducted    |               | +/- 0.9 dBm  |
| Frequency stability           |               | +/- 0.02 MHz |
| Occupied Bandwidth            |               | +/- 0.35 MHz |
| Unwanted Emissions, conducted |               | +/- 1.69 dBm |
| Emissions,<br>radiated        | 30 MHz~1GHz   | +/- 5.22 dB  |
|                               | 1 GHz~18 GHz  | +/- 6.12 dB  |
|                               | 18 GHz~40 GHz | +/- 4.99 dB  |
| Temperature                   |               | +/- 1.27 °C  |
| Humidity                      |               | +/- 3 %      |

**1.6 Environmental Conditions**

| Test Site                                   | Test Data             | Temperature<br>(°C) | Relative<br>Humidity<br>(%) | ATM<br>Pressure<br>(hPa) | Test Engineer |
|---|-----------------------|---------------------|-----------------------------|--------------------------|---------------|
| AC Line Conducted<br>Emissions              | 2023/01/12            | 24.3                | 69                          | 1010                     | Andy Cheng    |
| Radiation Spurious<br>Emissions             | 2023/01/10~2023/01/13 | 22.3~23.6           | 65~75                       | 1010                     | Jim Chen      |
| Conducted Spurious<br>Emissions             | 2023/01/11~2023/01/13 | 23.8~24.6           | 45~59                       | 1010                     | Andy Cheng    |
| 6 dB Emission<br>Bandwidth                  | 2023/01/11~2023/01/13 | 23.8~24.6           | 45~59                       | 1010                     | Andy Cheng    |
| Maximum Output<br>Power                     | 2023/01/11~2023/01/13 | 23.8~24.6           | 45~59                       | 1010                     | Andy Cheng    |
| 100 kHz Bandwidth of<br>Frequency Band Edge | 2023/01/11~2023/01/13 | 23.8~24.6           | 45~59                       | 1010                     | Andy Cheng    |
| Power Spectral Density                      | 2023/01/11~2023/01/13 | 23.8~24.6           | 45~59                       | 1010                     | Andy Cheng    |

### **1.7 Test Facility**

The Test site used by Bay Area Compliance Laboratories Corp. (New Taipei Laboratory) to collect test data is located on

☒ 70, Lane 169, Sec. 2, Datong Road, Xizhi Dist., New Taipei City 22183, Taiwan, R.O.C.

Bay Area Compliance Laboratories Corp. (New Taipei Laboratory) is accredited to ISO 17025 by Taiwan Accreditation Foundation (TAF code: 3546) and the FCC designation No.TW3546 under the Mutual Recognition Agreement (MRA) in FCC Test.

The lab has been recognized by Innovation, Science and Economic Development Canada to test to Canadian radio equipment requirements, the CAB identifier: TW3732.



## 2 System Test Configuration

### 2.1 Description of Test Configuration

For WIFI mode, there are totally 11 channels.

| Channel | Frequency (MHz) | Channel | Frequency (MHz) |
|---------|-----------------|---------|-----------------|
| 1       | 2412            | 7       | 2442            |
| 2       | 2417            | 8       | 2447            |
| 3       | 2422            | 9       | 2452            |
| 4       | 2427            | 10      | 2457            |
| 5       | 2432            | 11      | 2462            |
| 6       | 2437            |         |                 |

For 802.11 b Modes were tested with channel 1, 6 and 11. (data rate:1M)

For BLE mode, there are totally 40 channels.

| Channel | Frequency (MHz) | Channel | Frequency (MHz) |
|---------|-----------------|---------|-----------------|
| 0       | 2402            | 20      | 2442            |
| 1       | 2404            | --      | --              |
| 2       | 2406            | --      | --              |
| 3       | 2408            | 37      | 2476            |
| --      | --              | 38      | 2478            |
| 19      | 2440            | 39      | 2480            |

For BLE Modes were tested with channel 0, 19 and 39. (data rate:1Mbps)

The system was configured for testing in engineering mode, which was provided by manufacturer.

### 2.2 Equipment Modifications

No modification was made to the EUT.

### 2.3 EUT Exercise Software

The 2.4G WiFi test software uses "teraterm-4.106", BLE does not use test software.

| Test Frequency      |          | Low     | Mid     | High    |
|---------------------|----------|---------|---------|---------|
| Power Level Setting | B Mode   | default | default | default |
|                     | BLE Mode | default | default | default |

### 2.4 Support Equipment List and Details

| NO. | Description   | Manufacturer | Model Number |
|-----|---------------|--------------|--------------|
| 1   | Charging Dock | Tractive     | N/A          |
| 2   | Adapter       | Opro9        | FMP205       |

2.5 External Cable List and Details

| NO. | Cable Description | Length | From          | To      |
|-----|-------------------|--------|---------------|---------|
| A   | USB Cable         | 0.8    | Charging dock | Adapter |

2.6 Test Mode

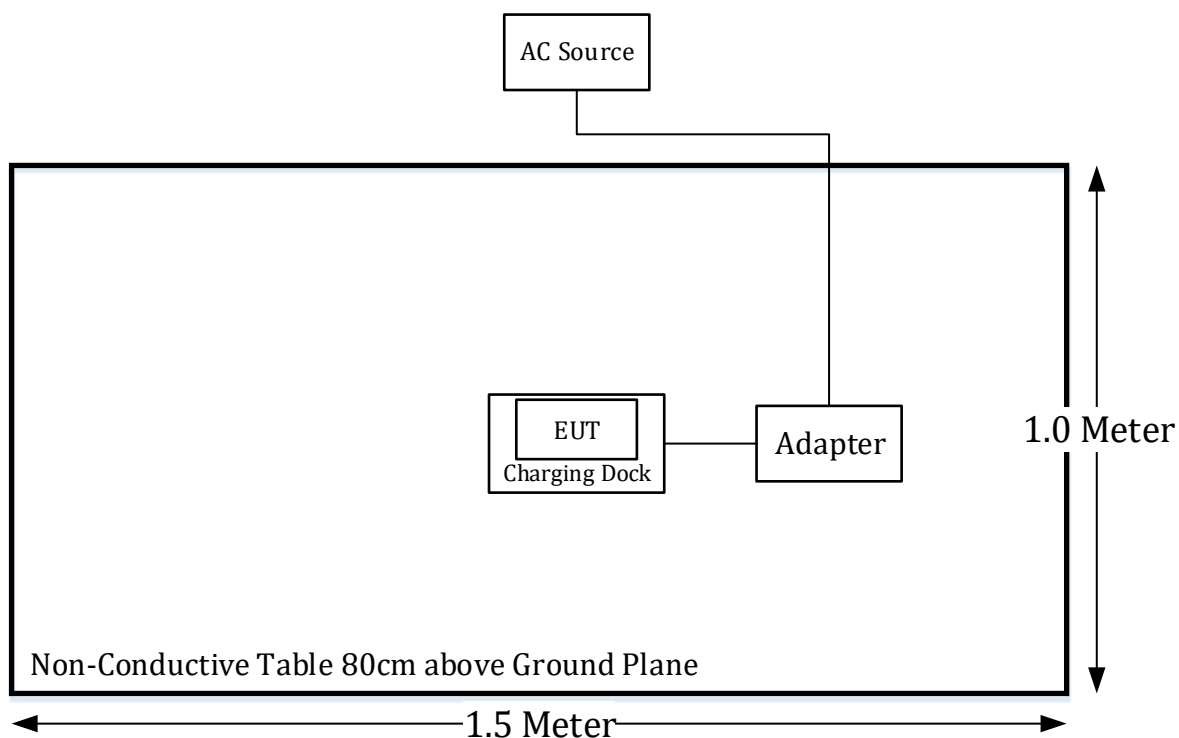
Full System (model: TG5) test item.

## 2.7 Block Diagram of Test Setup

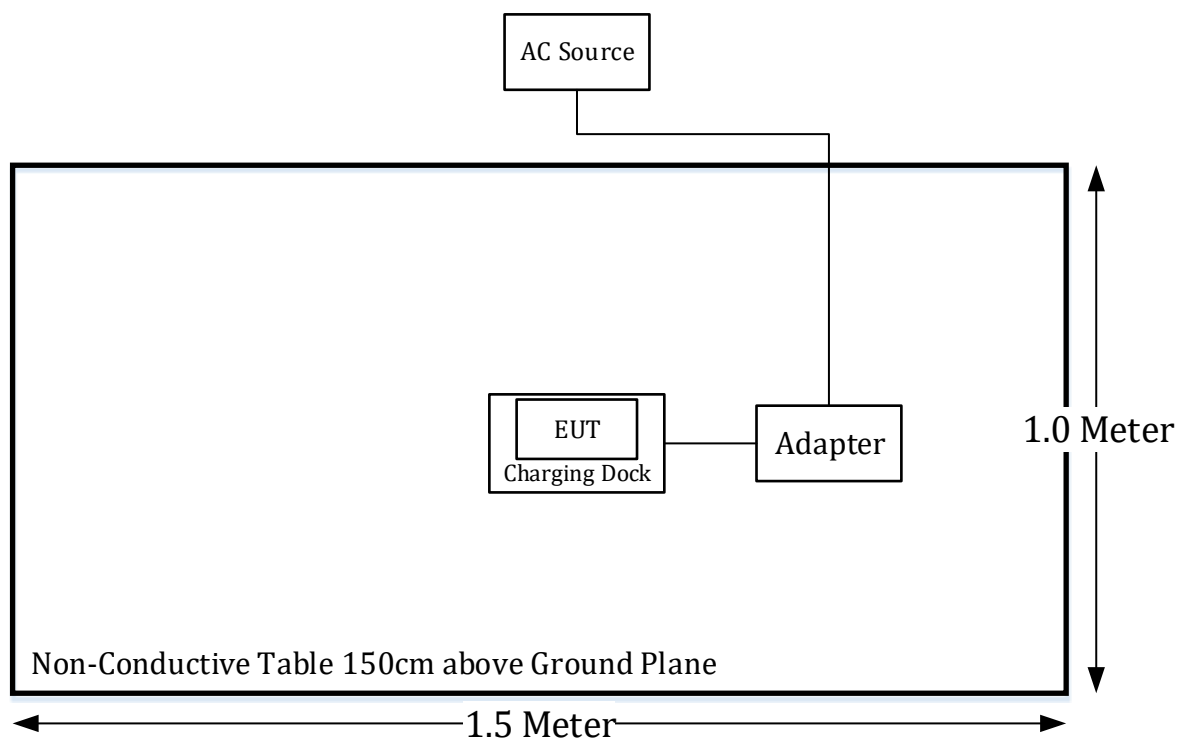
See test photographs attached in setup photos for the actual connections between EUT and support equipment.

### Radiation:

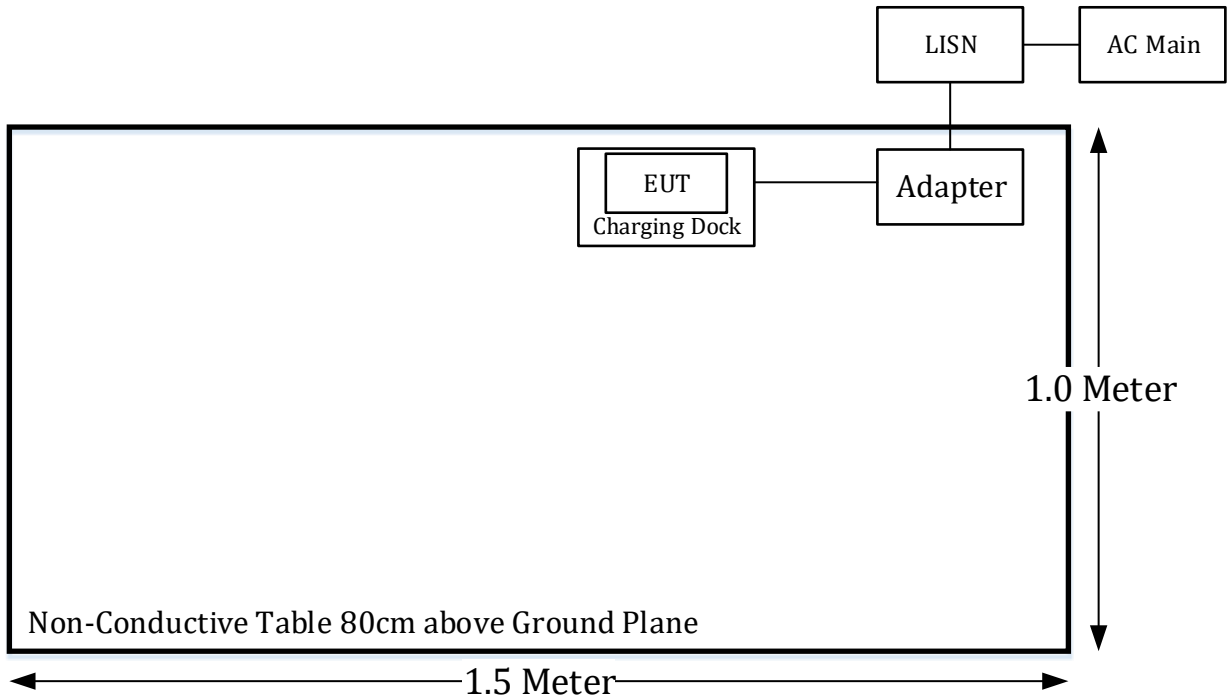
Below 1GHz:



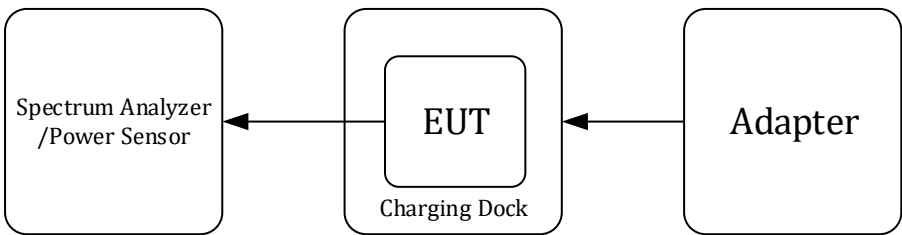
Above 1GHz:



Conduction:



Conducted:



2.8 Duty Cycle

The duty cycle as below:

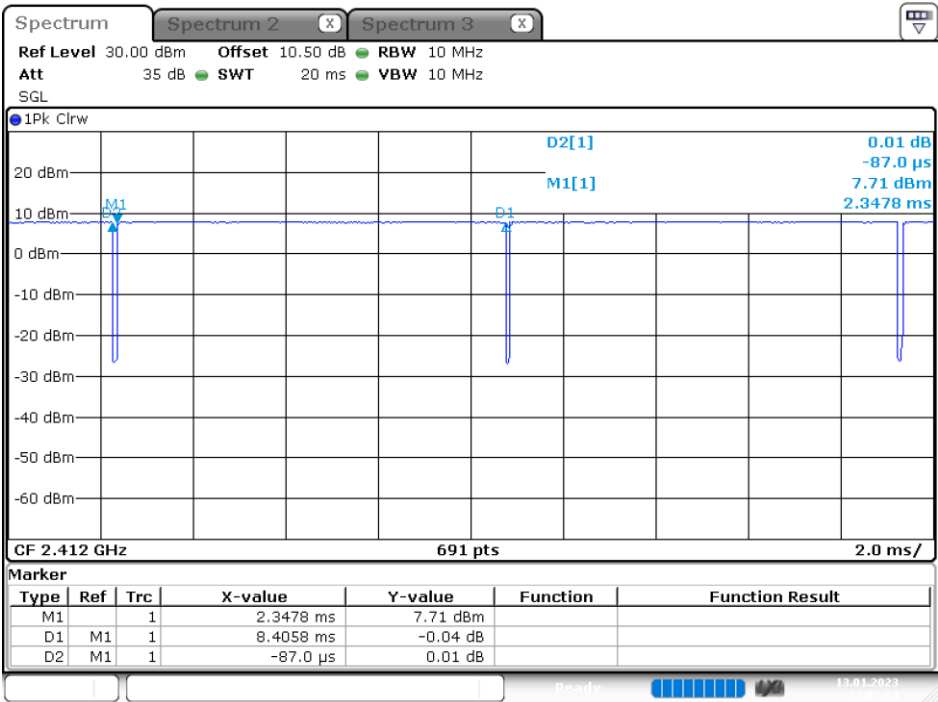
| Radio Mode | On Time<br>(ms) | Off Time<br>(ms) | Duty Cycle<br>(%) | Duty Cycle Correction Factor<br>(dB) |
|------------|-----------------|------------------|-------------------|--------------------------------------|
| 802.11b    | 8.4058          | 0.087            | 0.99              | 0.04                                 |
| BLE (1M)   | 0.178           | 0.447            | 0.28              | 5.53                                 |

B MODE:  $1/T=1/8.4058=0.1189$     VBW=200Hz

BLE MODE:  $1/T=1/0.178= 5.617$     VBW=10KHz

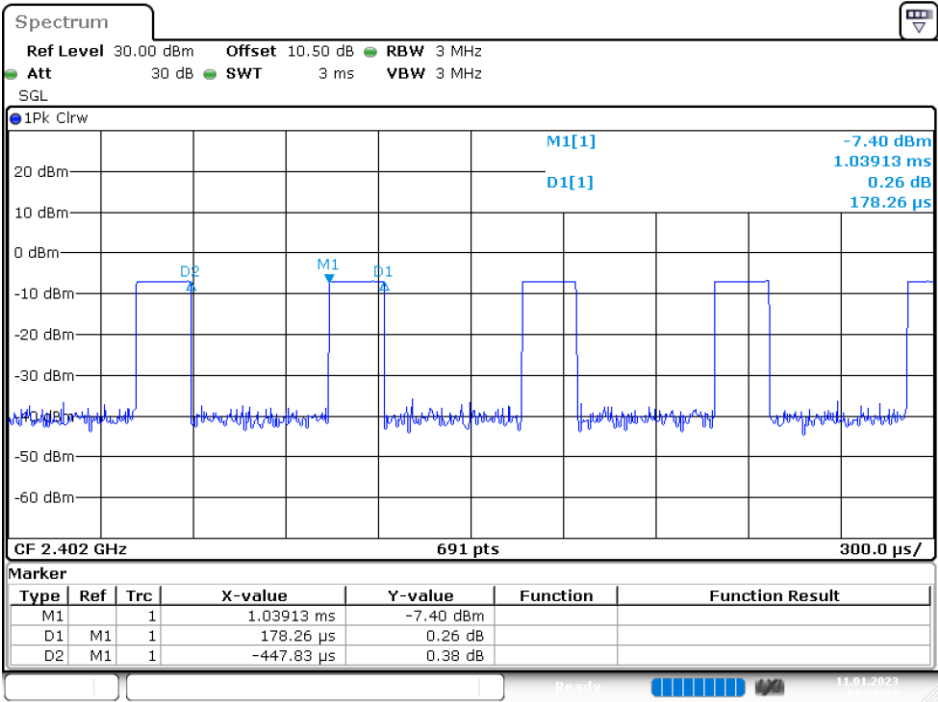
Please refer to the following plots.

B Mode



Date: 13.JAN.2023 14:07:05

BLE Mode



Date: 11.JAN.2023 07:55:17

### 3 Summary of Test Results

| Rules   | Description of Test  | Results    |
|---|--|------------|
| FCC §15.247(i), §1.1307(b)(3)(i)                          | RF Exposure  | Compliance |
| RSS-102 §2.5.1  | Exemption Limits from Routine Evaluation –<br>SAR Evaluation | Compliance |
| FCC §15.203<br>RSS-Gen §6.8                               | Antenna Requirements   | Compliance |
| FCC §15.207(a)<br>RSS-Gen §8.8                            | AC Line Conducted Emissions                                  | Compliance |
| FCC §15.209, §15.205, §15.247(d)<br>& RSS-GEN §8.9, §8.10 | Spurious Emissions   | Compliance |
| FCC §15.247(a)(2)<br>RSS-247 §5.2 (a)<br>RSS-Gen §6.7     | 6 dB Emission Bandwidth & Occupied<br>Bandwidth              | Compliance |
| FCC §15.247(b)(3)<br>RSS-247 §5.4 (d)                     | Maximum Output Power   | Compliance |
| FCC §15.247(d)<br>RSS-247 §5.5                            | 100 kHz Bandwidth of Frequency Band Edge                     | Compliance |
| FCC §15.247(e)<br>RSS-247 §5.2 (b)                        | Power Spectral Density                                       | Compliance |

## 4 Test Equipment List and Details

| Description                        | Manufacturer                   | Model                  | Serial Number    | Calibration Date | Calibration Due Date |
|------------------------------------|--------------------------------|------------------------|------------------|------------------|----------------------|
| AC Line Conduction Room (CON-A)    |                                |                        |                  |                  |                      |
| LISN                               | Rohde & Schwarz                | ENV216                 | 101248           | 2022/6/22        | 2023/6/21            |
| EMI Test Receiver                  | Rohde & Schwarz                | ESR3                   | 102099           | 2022/6/16        | 2023/6/15            |
| Pulse Limiter                      | Rohde & Schwarz                | ESH3Z2                 | TXZEM104         | 2022/7/19        | 2023/7/18            |
| RF Cable                           | EMEC                           | EM-CB5D                | 1                | 2022/6/7         | 2023/6/6             |
| Software                           | AUDIX                          | E3                     | V9.150826k       | N.C.R            | N.C.R                |
| Radiation 3M Room (966-A)          |                                |                        |                  |                  |                      |
| Spectrum Analyzer                  | Rohde & Schwarz                | FSV40                  | 101435           | 2023/1/6         | 2024/1/13            |
| Bilog Antenna with 6 dB Attenuator | SUNOL SCIENCES & MINI-CIRCUITS | JB6/UNAT-6+            | A050115/15542_01 | 2022/2/14        | 2023/2/13            |
| EMI Test Receiver                  | Rohde & Schwarz                | ESR7                   | 101419           | 2022/11/2        | 2023/11/1            |
| Horn Antenna                       | EMCO                           | SAS-571                | 1020             | 2022/5/25        | 2023/5/24            |
| Horn Antenna                       | ETS-Lindgren                   | 3116                   | 62638            | 2022/8/18        | 2023/8/17            |
| Preamplifier                       | Sonoma                         | 310N                   | 130602           | 2022/6/16        | 2023/6/15            |
| Microwave Preamplifier             | EM Electronics Corporation     | EM18G40G               | 60656            | 2023/1/6         | 2024/1/5             |
| Micro flex Cable                   | UTIFLEX                        | UFB197C-1-2362-70U-70U | 225757-001       | 2022/1/24        | 2023/1/23            |
| Coaxial Cable                      | COMMATE                        | PEWC                   | 8Dr              | 2022/12/24       | 2023/12/23           |
| Coaxial Cable                      | UTIFLEX                        | UFB311A-Q-1440-300300  | 220490-006       | 2022/1/24        | 2023/1/23            |
| Coaxial Cable                      | JUNFLON                        | J12J102248-00-B-5      | AUG-07-15-044    | 2022/12/24       | 2023/12/23           |
| Cable                              | EMC                            | EMC105-SM-SM-10000     | 201003           | 2022/1/24        | 2023/1/23            |
| Preamplifier                       | A.H. system Inc.               | PAM-0118P              | 470              | 2022/3/28        | 2023/3/27            |
| Software                           | Farad                          | EZ EMC                 | BACL-03A1        | N.C.R            | N.C.R                |
| Conducted Room                     |                                |                        |                  |                  |                      |
| Spectrum Analyzer                  | Rohde & Schwarz                | FSV40                  | 101140           | 2022/2/18        | 2023/2/17            |
| Cable                              | UTIFLEX                        | UFA210A                | 9435             | 2022/10/3        | 2023/10/2            |

|              |               |           |            |           |           |
|--------------|---------------|-----------|------------|-----------|-----------|
| Power Sensor | KEYSIGHT      | U2021XA   | MY54080018 | 2022/1/24 | 2023/1/23 |
| Attenuator   | MINI-CIRCUITS | BW-S10W5+ | 1419       | 2022/2/11 | 2023/2/10 |

**\*Statement of Traceability:** BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to the SI System of Units via the R.O.C. Center for Measurement Standards of the Electronics Testing Center, Taiwan (ETC) or to another internationally recognized National Metrology Institute (NMI), and were compliant with the current Taiwan Accreditation Foundation (TAF) requirements.



## 5 FCC §15.247(i), §1.1307(b)(3)(i) - RF Exposure

### 5.1 Applicable Standard

According to subpart 15.247(i) and subpart §1.1307(b)(3)(i), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

For single RF sources (i.e., any single fixed RF source, mobile device, or portable device, as defined in paragraph (b)(2) of this section): A single RF source is exempt if:

(A) The available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption may not be used in conjunction with other exemption criteria other than those in paragraph (b)(3)(ii)(A) of this section. Medical implant devices may only use this exemption and that in paragraph (b)(3)(ii)(A);

The sequence to apply for single portable RF sources includes the following steps:

- 1) determination of 1 mW blanket exemption under § 1.1307(b)(3)(i)(A)
- 2) determination of exemption under the MPE-based § 1.1307(b)(3)(i)(C) if 1) is not met
- 3) determination of exemption under the SAR-based § 1.1307(b)(3)(i)(B) if both 1) and 2) are not met

### 5.2 RF Exposure Evaluation Result

Project info

| Band | Freq (MHz) | Turn-up Average Power (dBm) | Ant Gain (dBi) | Distances (mm) | Turn-up (mW) | ERP (dBm) | ERP (mW) |
|------|------------|-----------------------------|----------------|----------------|--------------|-----------|----------|
| BLE  | 2480       | -5.5                        | 2.29           | 5              | 0.28         | -5.36     | 0.29     |

§ 1.1307(b)(3)(i)(A) method is applicable.

Option A The available maximum time-averaged power is no more than 1 mW

| Band | Freq (MHz) | Result Option A |
|------|------------|-----------------|
| BLE  | 2480       | exempt          |

**Result:** The EUT meets exemption requirement for BLE

RF Exposure Evaluation Result for WIF

Please refer to the SAR report, report No.: RXZ230110032SA01

## 6 RSS-102 § 2.5.1 – EXEMPTION LIMITS FROM ROUTINE EVALUATION – SAR EVALUATION

### 6.1 Applicable Standard

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1.

| Table 1: SAR evaluation — Exemption limits for routine evaluation based on frequency and separation distance |                       |               |               |               |               |
|--|-----------------------|---------------|---------------|---------------|---------------|
| Frequency (MHz)  | Exemption Limits (mW) |               |               |               |               |
|  | At separation         | At separation | At separation | At separation | At separation |
|  | distance of           | distance of   | distance of   | distance of   | distance of   |
|  | ≤5 mm                 | 10 mm         | 15 mm         | 20 mm         | 25 mm         |
| ≤300   | 71 mW                 | 101 mW        | 132 mW        | 162 mW        | 193 mW        |
| 450  | 52 mW                 | 70 mW         | 88 mW         | 106 mW        | 123 mW        |
| 835  | 17 mW                 | 30 mW         | 42 mW         | 55 mW         | 67 mW         |
| 1900   | 7 mW                  | 10 mW         | 18 mW         | 34 mW         | 60 mW         |
| 2450   | 4 mW                  | 7 mW          | 15 mW         | 30 mW         | 52 mW         |
| 3500   | 2 mW                  | 6 mW          | 16 mW         | 32 mW         | 55 mW         |
| 5800   | 1 mW                  | 6 mW          | 15 mW         | 27 mW         | 41 mW         |
| Frequency (MHz)  | Exemption Limits (mW) |               |               |               |               |
|  | At separation         | At separation | At separation | At separation | At separation |
|  | distance of           | distance of   | distance of   | distance of   | distance of   |
|  | 30 mm                 | 35 mm         | 40 mm         | 45 mm         | ≥50 mm        |
| ≤300   | 223 mW                | 254 mW        | 284 mW        | 315 mW        | 345 mW        |
| 450  | 141 mW                | 159 mW        | 177 mW        | 195 mW        | 213 mW        |
| 835  | 80 mW                 | 92 mW         | 105 mW        | 117 mW        | 130 mW        |
| 1900   | 99 mW                 | 153 mW        | 225 mW        | 316 mW        | 431 mW        |
| 2450   | 83 mW                 | 123 mW        | 173 mW        | 235 mW        | 309 mW        |
| 3500   | 86 mW                 | 124 mW        | 170 mW        | 225 mW        | 290 mW        |
| 5800   | 56 mW                 | 71 mW         | 85 mW         | 97 mW         | 106 mW        |

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5.

If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required. For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p. to determine whether the device is exempt from the SAR evaluation.

## 6.2 RF Exposure Evaluation Result

BLE

Tune-up power = -5.5dBm

EIRP = -3.21 dBm = 0.478 mW

Exemption from Routine Evaluation Limit is:

$$1.31 \times 10^{-2} f^{0.6834} = 1.31 \times 10^{-2} 2402^{0.6834} = 2.68\text{W} > 0.478\text{mW}$$

**Result:** The device meets the exemption requirement for BLE

RF Exposure Evaluation Result for WIF

Please refer to the SAR report, report No.: RXZ230110032SA02

## 7 FCC §15.203 & RSS-GEN §6.8– Antenna Requirements

### 7.1 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.

According to RSS-Gen 6.8:

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

### 7.2 Antenna Information

| Manufacturer                   | Type         | Antenna Gain | Impedance |
|--------------------------------|--------------|--------------|-----------|
| ZHEJIANG JIAKANG<br>ELETRONICS | Chip Antenna | 2.29 dBi     | 50Ω       |

### Result: Compliance

## 8 FCC §15.207(a) & RSS-GEN §8.8– AC Line Conducted Emissions

### 8.1 Applicable Standard

According to §15.207

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

According to RSS-GEN §8.8

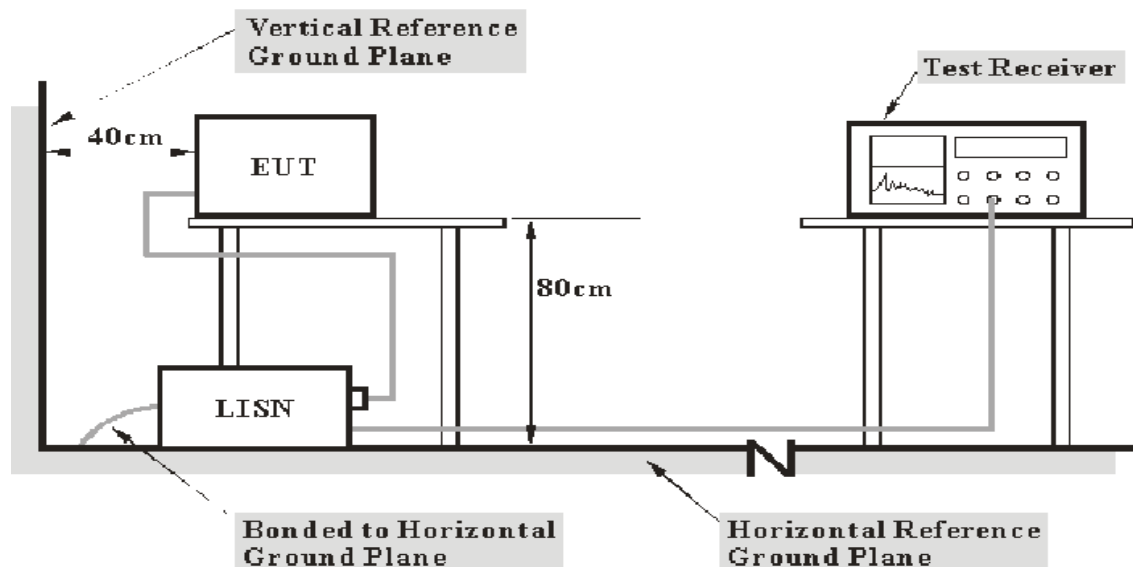
Unless stated otherwise in the applicable RSS, for radio apparatus that are designed to be connected to the public utility AC power network, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the range 150 kHz to 30 MHz shall not exceed the limits in 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.

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.

| Frequency of Emission<br>(MHz) | Conducted Limit (dBuV)     |                            |
|--------------------------------|----------------------------|----------------------------|
|                                | Quasi-Peak                 | Average                    |
| 0.15-0.5                       | 66 to 56 <sup>Note 1</sup> | 56 to 46 <sup>Note 1</sup> |
| 0.5-5                          | 56                         | 46                         |
| 5-30                           | 60                         | 50                         |

*Note 1: Decreases with the logarithm of the frequency.*

## 8.2 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 and RSS-GEN limits.

## 8.3 EMI Test Receiver Setup

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

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

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

## 8.4 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 data was recorded in the Quasi-peak and average detection mode.

## 8.5 Corrected Factor & Margin Calculation

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

$$\text{Factor} = \text{LISN VDF} + \text{Cable Loss} + \text{Transient Limiter Attenuation}$$

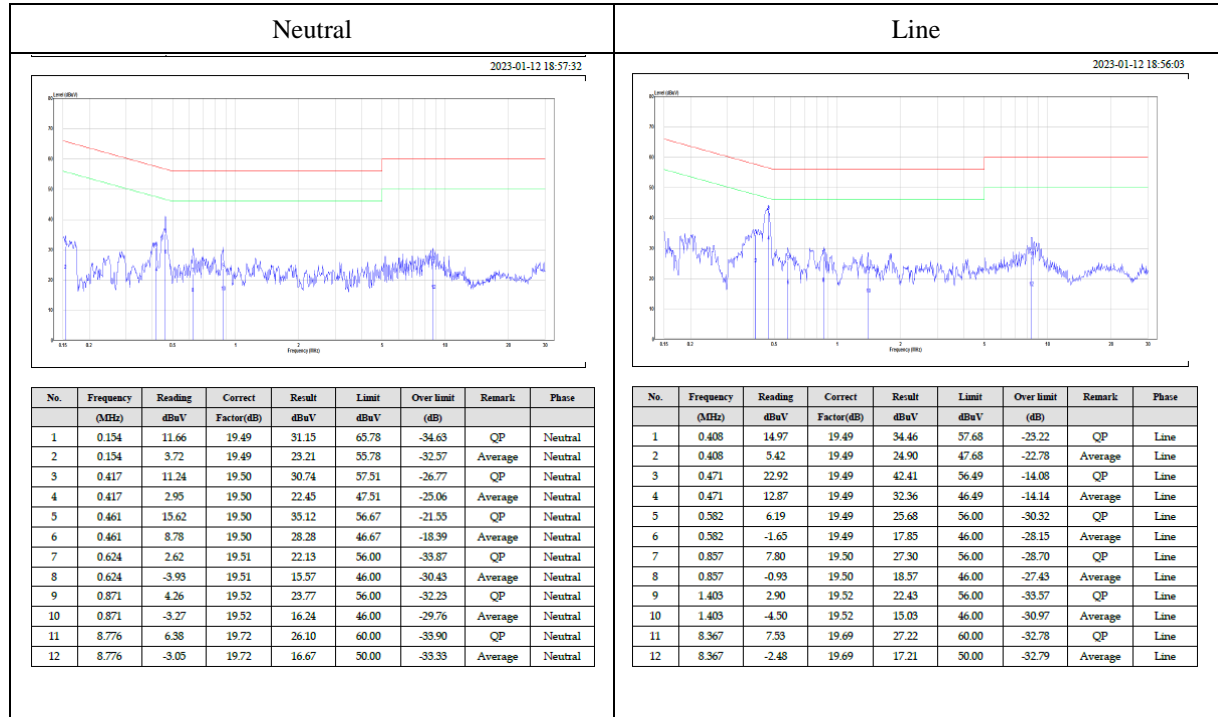
The “Over Limit” column of the following data tables indicates the degree of compliance with the applicable limit. For example, an over limit of -7 dB means the emission is 7 dB below the limit. The equation for Over Limit calculation is as follows:

$$\text{Over Limit} = \text{Level} - \text{Limit Line}$$

8.6 Test Results

Main: AC120 V, 60 Hz,

2.4G WiFi



Note:

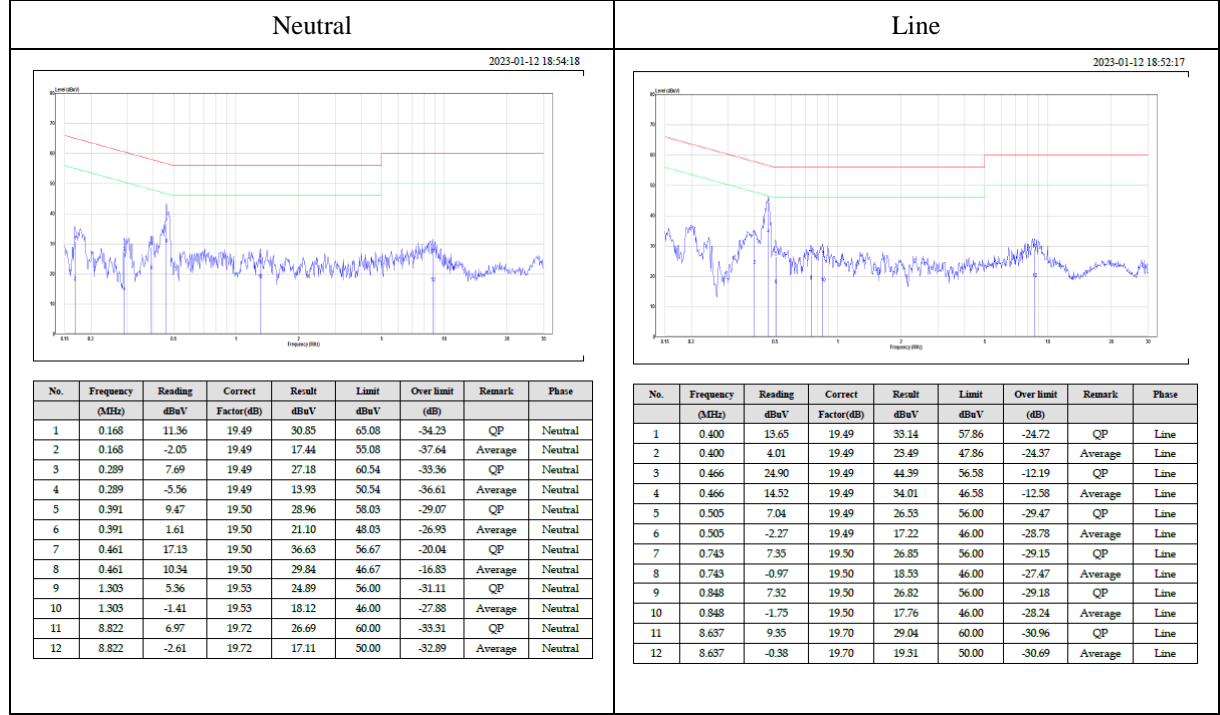
Level = Read Level + Factor

Over Limit = Level – Limit Line

Factor = (LISN, ISN, PLC or current probe) Factor + Cable Loss + Attenuator



BLE



Note:

Level = Read Level + Factor

Over Limit = Level – Limit Line

Factor = (LISN, ISN, PLC or current probe) Factor + Cable Loss + Attenuator

## 9 FCC §15.209, §15.205, §15.247(d) & RSS-GEN §8.9, §8.10 – Spurious Emissions

### 9.1 Applicable Standard

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1MHz.

As per RSS-Gen 8.10,

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 7 shall comply either with the limits specified in the applicable RSS or with those specified in table 5 and table 6.

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

| MHz                 | MHz                   | MHz             | GHz           |
|---------------------|-----------------------|-----------------|---------------|
| 0.090 – 0.110       | 16.42 – 16.423        | 608 – 614       | 4.5 – 5.15    |
| 0.495 – 0.505       | 16.69475 – 16.69525   | 960 – 1240      | 5.35 – 5.46   |
| 2.1735 – 2.1905     | 16.80425 – 16.80475   | 1300 – 1427     | 7.25 – 7.75   |
| 4.125 – 4.128       | 25.5 – 25.67          | 1435 – 1626.5   | 8.025 – 8.5   |
| 4.17725 – 4.17775   | 37.5 – 38.25          | 1645.5 – 1646.5 | 9.0 – 9.2     |
| 4.20725 – 4.20775   | 73 – 74.6             | 1660 – 1710     | 9.3 – 9.5     |
| 6.215 – 6.218       | 74.8 – 75.2           | 1718.8 – 1722.2 | 10.6 – 12.7   |
| 6.26775 – 6.26825   | 108 – 121.94          | 2200 – 2300     | 13.25 – 13.4  |
| 6.31175 – 6.31225   | 123 – 138             | 2310 – 2390     | 14.47 – 14.5  |
| 8.291 – 8.294       | 149.9 – 150.05        | 2483.5 – 2500   | 15.35 – 16.2  |
| 8.362 – 8.366       | 156.52475 – 156.52525 | 2690 – 2900     | 17.7 – 21.4   |
| 8.37625 – 8.38675   | 156.7 – 156.9         | 3260 – 3267     | 22.01 – 23.12 |
| 8.41425 – 8.41475   | 162.0125 – 167.17     | 3.332 – 3.339   | 23.6 – 24.0   |
| 12.29 – 12.293      | 167.72 – 173.2        | 3.3458 – 3.358  | 31.2 – 31.8   |
| 12.51975 – 12.52025 | 240 – 285             | 3.600 – 4.400   | 36.43 – 36.5  |
| 12.57675 – 12.57725 | 322 – 335.4           |                 | Above 38.6    |
| 13.36 – 13.41       | 399.9 – 410           |                 |               |

As per FCC §15.209(a) and RSS-GEN §8.9: Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

| Frequency (MHz) | Field Strength (micro volts/meter) | Measurement Distance (meters) |
|-----------------|------------------------------------|-------------------------------|
| 0.009 - 0.490   | 2400/F(kHz)                        | 300                           |
| 0.490 - 1.705   | 24000/F(kHz)                       | 30                            |
| 1.705 - 30.0    | 30                                 | 30                            |
| 30 - 88         | 100**                              | 3                             |
| 88 - 216        | 150**                              | 3                             |
| 216 - 960       | 200**                              | 3                             |
| Above 960       | 500                                | 3                             |

\*\* Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

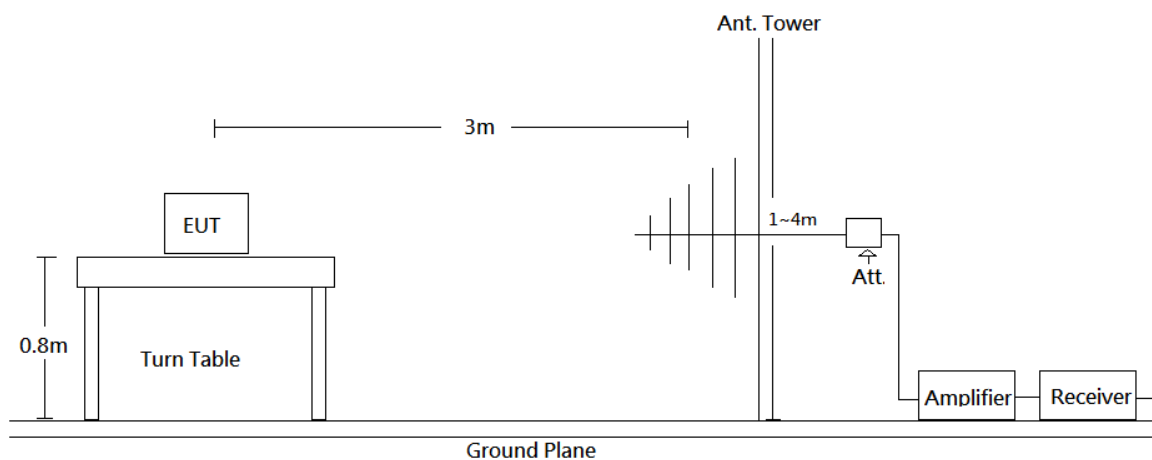
As per FCC §15.247 (d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

As per RSS-247 5.5,

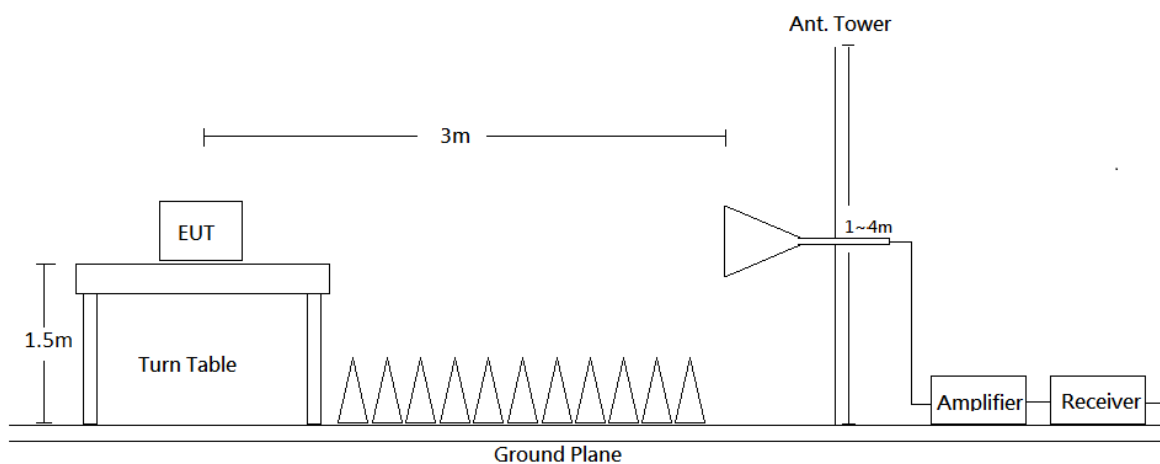
In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either 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.

## 9.2 EUT Setup

Below 1 GHz:



Above 1 GHz:



Radiated emission tests were performed in the 3 meters chamber test site, using the setup accordance with the ANSI C63.10-2013. The specification used was the FCC Part 15.209, FCC 15.247 and RSS-Gen, RSS-247 Limits.

## 9.3 EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 26.5 GHz. During the radiated emission test, the EMI test receiver was set with the following configurations measurement method 6.3 in ANSI C63.10.

| Frequency Range | RBW     | VBW   | Duty cycle | Measurement method |
|-----------------|---------|-------|------------|--------------------|
| 30-1000 MHz     | 120 kHz | /     | /          | QP                 |
| Above 1 GHz     | 1 MHz   | 3 MHz | /          | PK                 |
|                 | 1 MHz   | 10 Hz | >98%       | Ave                |
|                 | 1 MHz   | 1/T   | <98%       | Ave                |

Note: T is minimum transmission duration

## 9.4 Test Procedure

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

All data was recorded in the Quasi-peak detector mode from 30 MHz to 1 GHz and PK and average detector modes for frequencies above 1 GHz.

## 9.5 Corrected Factor & Margin Calculation

The Correct Factor 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:

$$\text{Correct Factor} = \text{Antenna Factor} + \text{Cable Loss} - \text{Amplifier Gain}$$

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:

$$\text{Margin} = \text{Result} - \text{Limit}$$

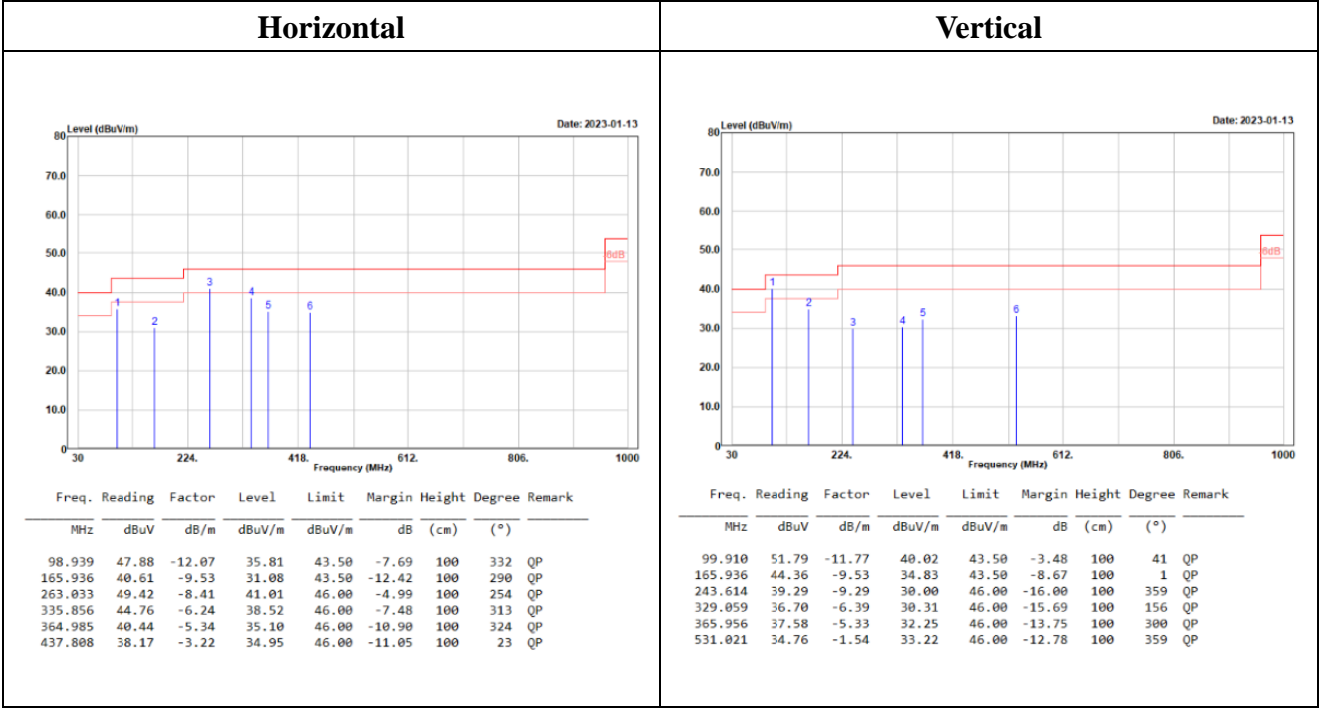
9.6 Test Results

Test Mode: Transmitting

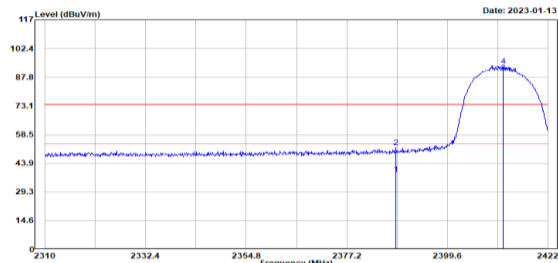
Power: AC120/60Hz

WiFi Mode (Pre-scan with three orthogonal axis, and worse case as Y axis.)

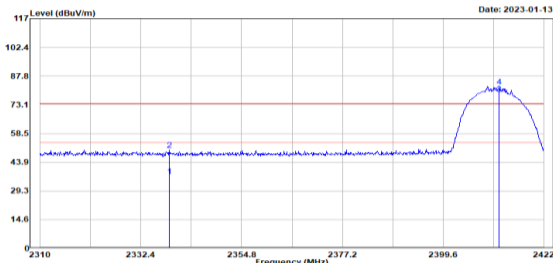
30MHz-1GHz:



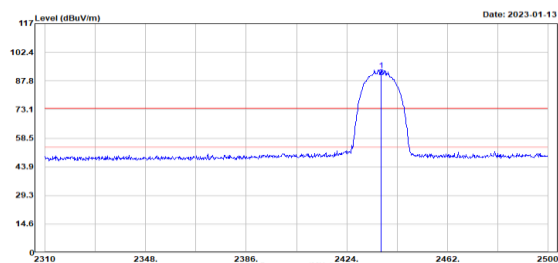
Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.

**Fundamental:****Low channel****Horizontal**

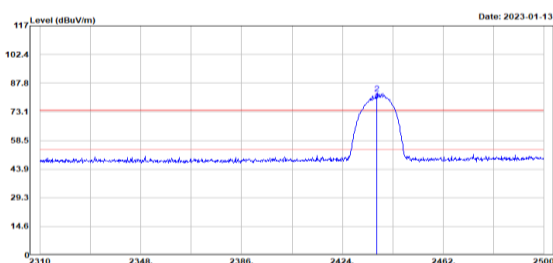
| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2388.142 | 43.06   | -4.60  | 38.46  | 54.00  | -15.54 | 101    | 136    | Average |
| 2388.142 | 56.56   | -4.60  | 51.96  | 74.00  | -22.04 | 101    | 136    | Peak    |
| 2412.000 | 94.58   | -4.42  | 90.16  |        |        | 101    | 136    | Average |
| 2412.000 | 98.03   | -4.42  | 93.61  |        |        | 101    | 136    | Peak    |

**Vertical**

| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2338.813 | 41.82   | -4.97  | 36.85  | 54.00  | -17.15 | 150    | 193    | Average |
| 2338.813 | 55.07   | -4.97  | 50.10  | 74.00  | -23.90 | 150    | 193    | Peak    |
| 2412.000 | 83.20   | -4.42  | 78.78  |        |        | 150    | 193    | Average |
| 2412.000 | 86.72   | -4.42  | 82.30  |        |        | 150    | 193    | Peak    |

**Middle channel****Horizontal**

| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2437.000 | 97.56   | -4.22  | 93.34  |        |        | 103    | 300    | Average |
| 2437.000 | 94.05   | -4.24  | 89.81  |        |        | 103    | 300    | Average |

**Vertical**

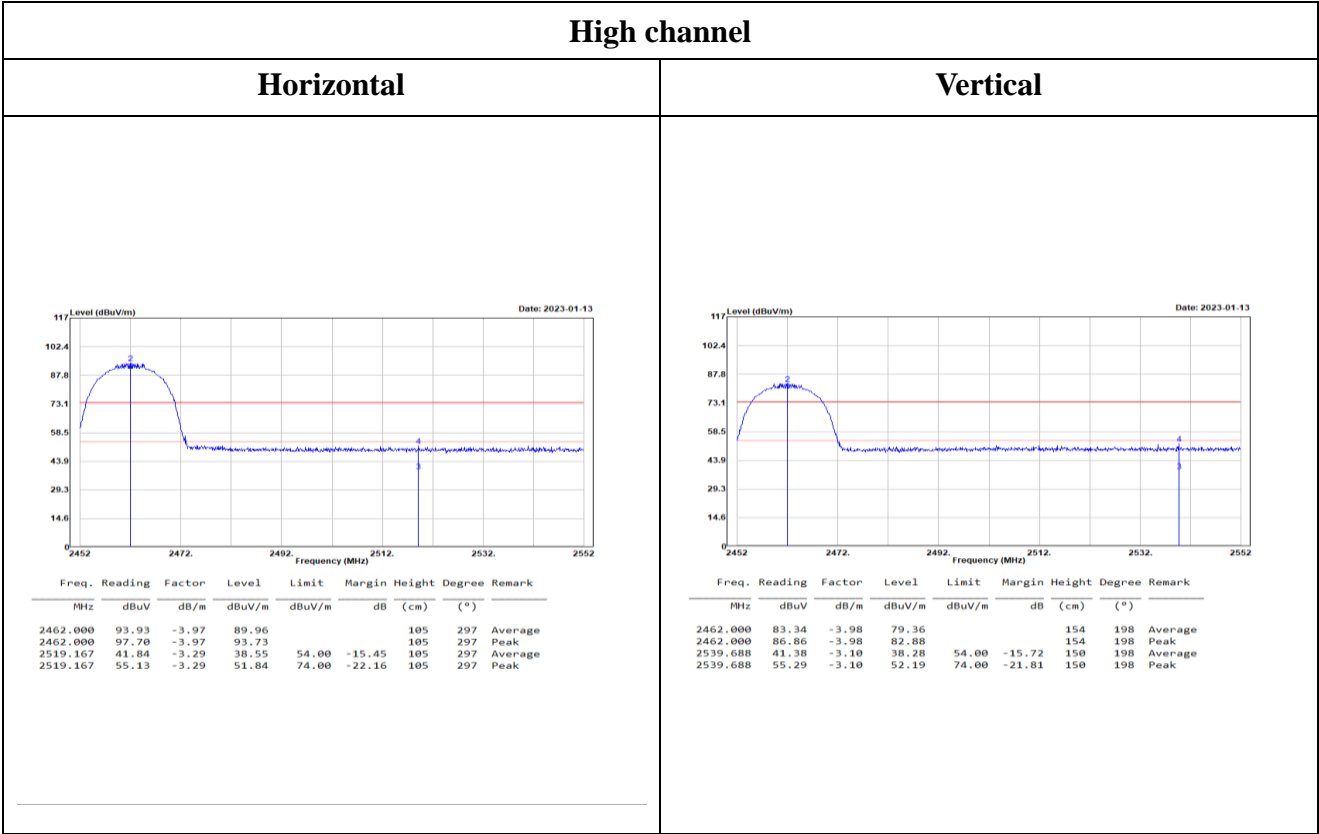
| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2437.000 | 83.25   | -4.20  | 79.05  |        |        | 150    | 177    | Average |
| 2437.000 | 86.55   | -4.20  | 82.35  |        |        | 152    | 177    | Peak    |

Level (Result) = Reading + Factor.

Over Limit = Level – Limit.

Factor = Antenna Factor + Cable Loss – Amplifier Gain.

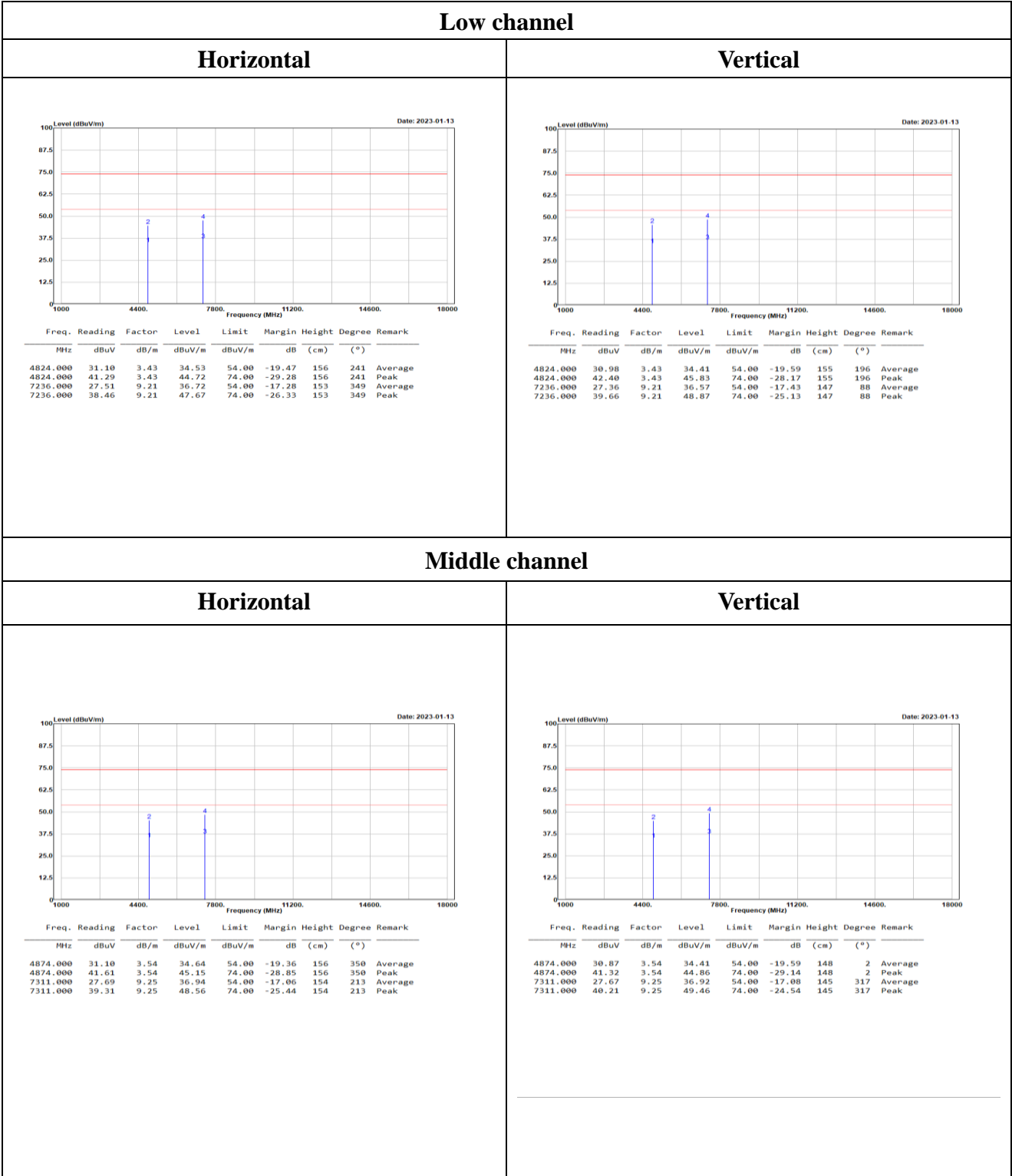
Spurious emissions more than 20 dB below the limit were not reported.



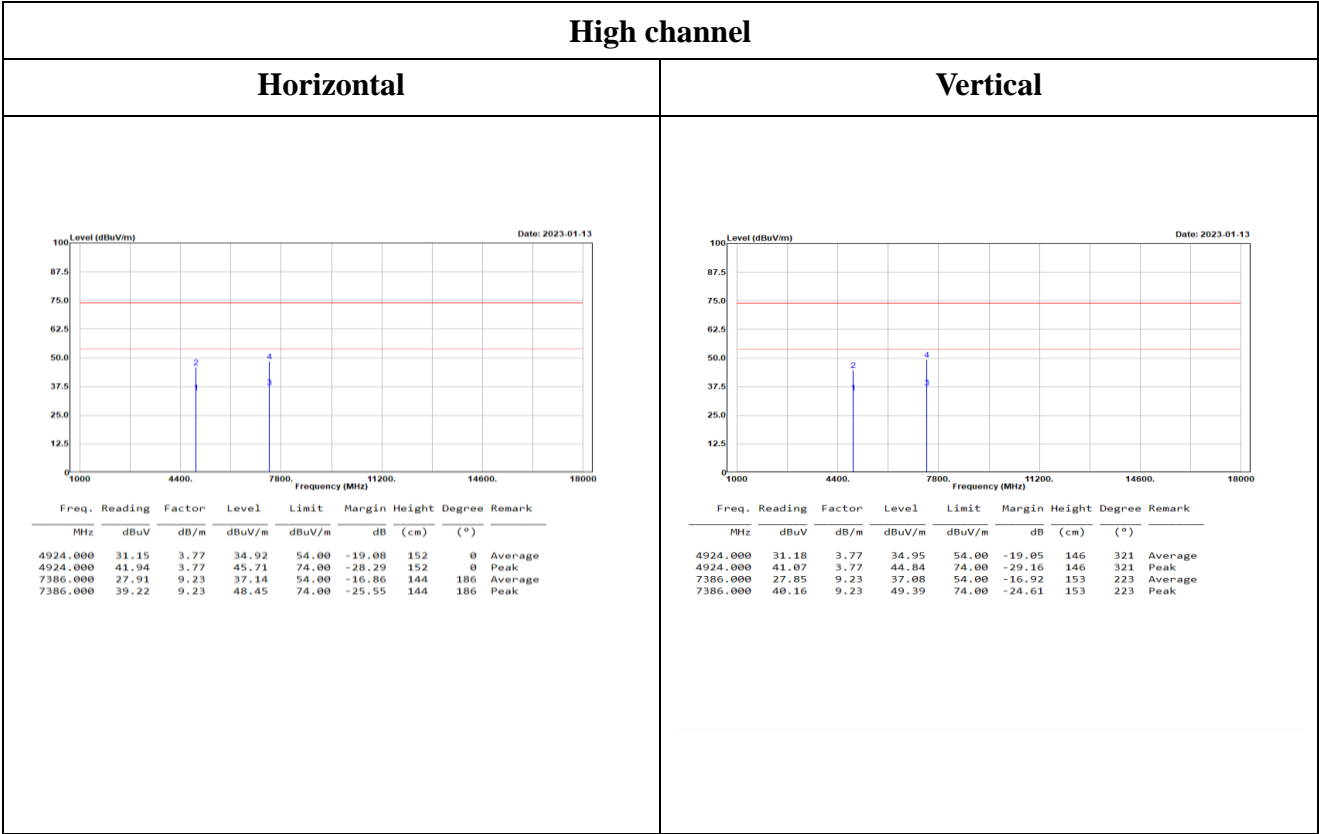
Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.



1GHz~18GHz

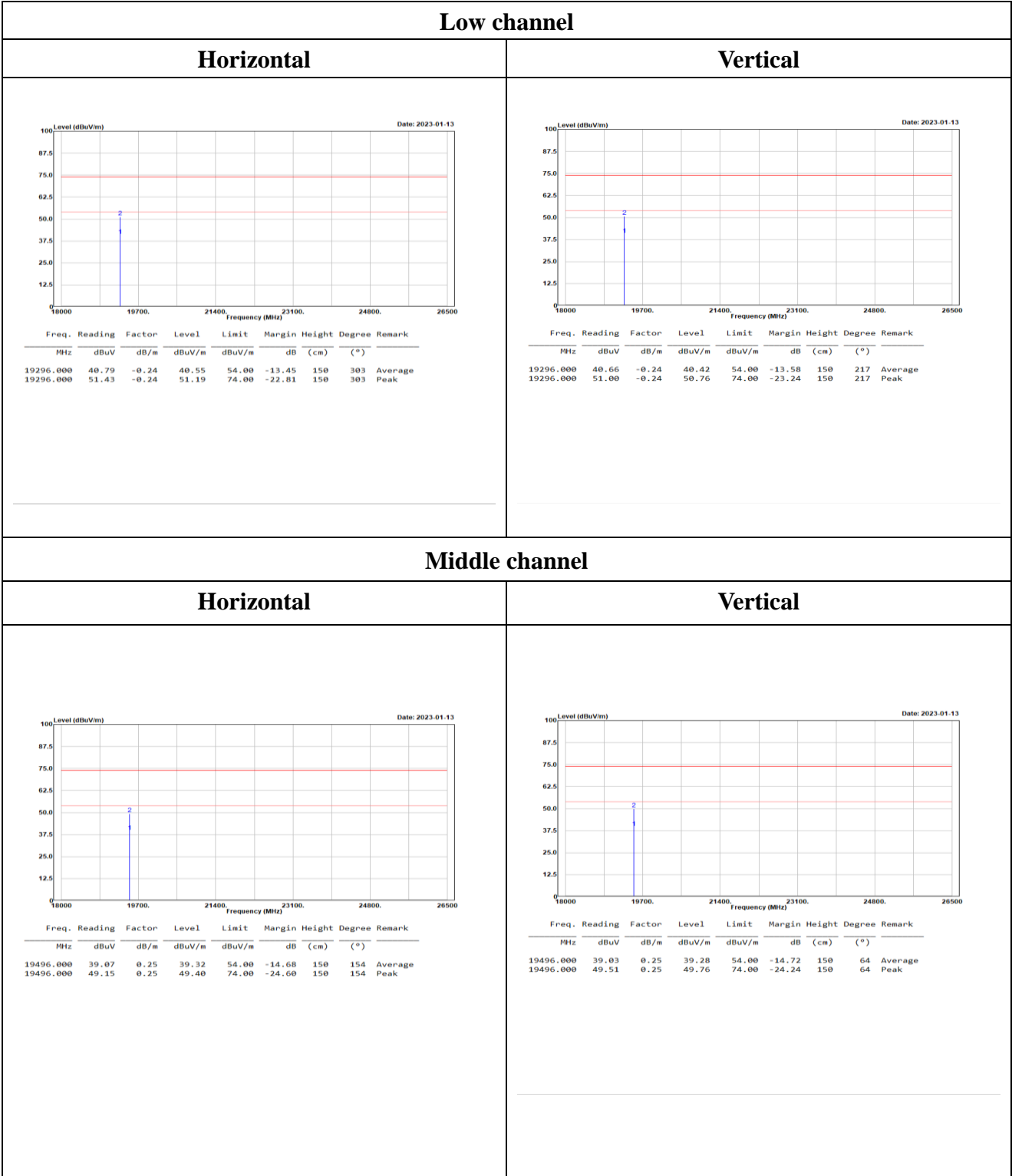


Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.

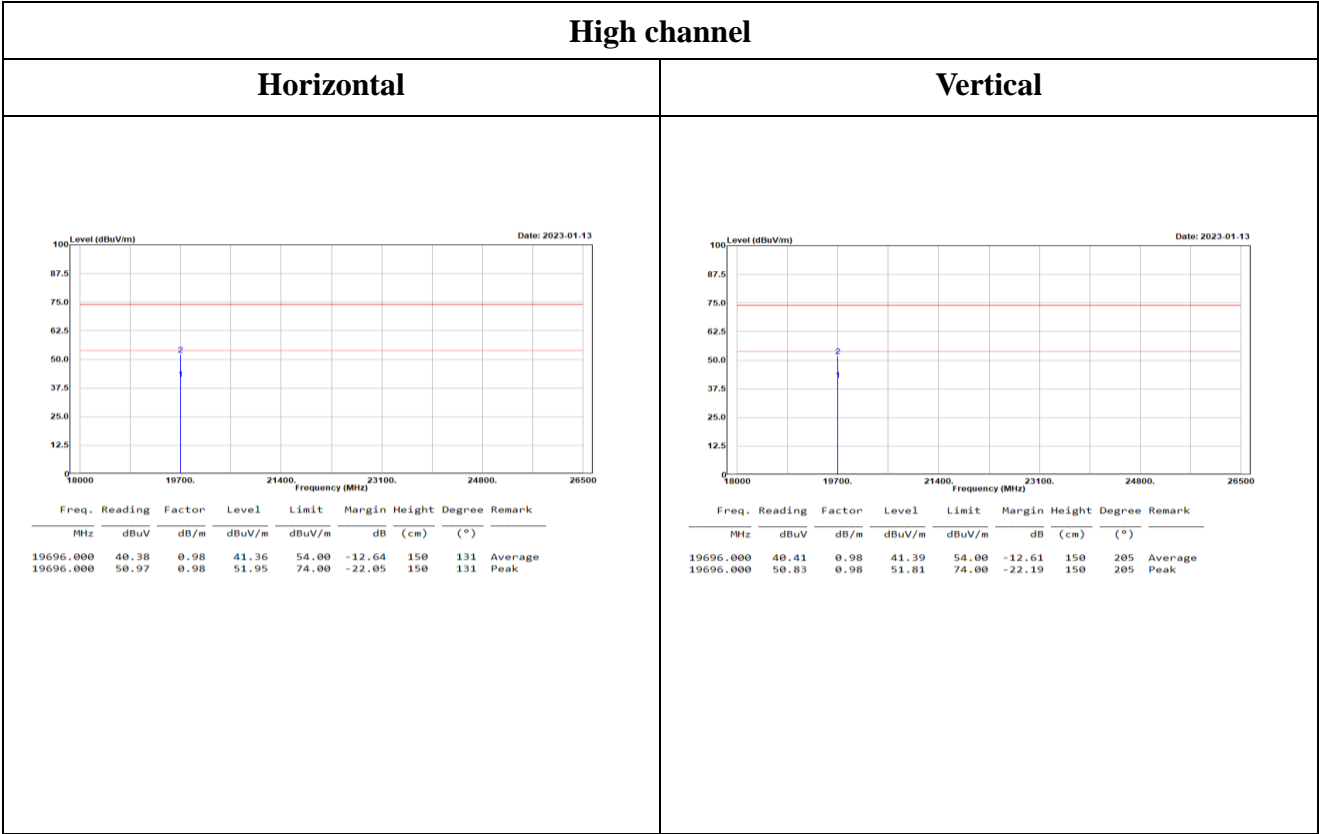


Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.

18GHz~26.5GHz



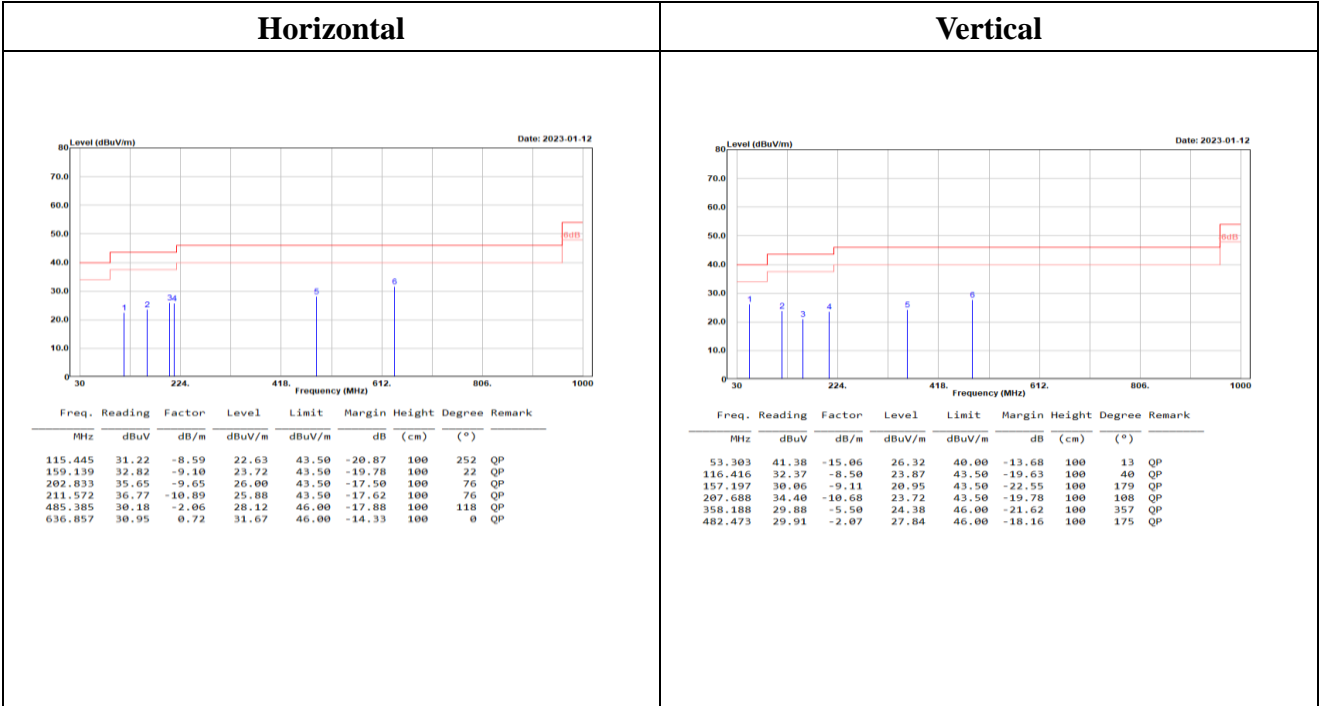
Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.



Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.

**BLE Mode** (Pre-scan with three orthogonal axis, and worse case as Y axis.)

**30MHz-1GHz:**

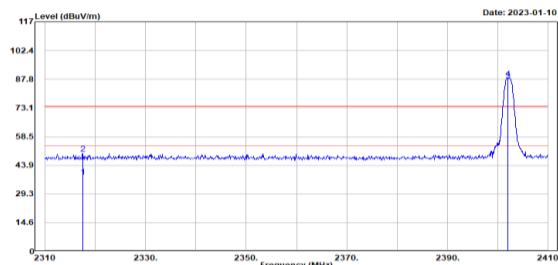


Level (Result) = Reading + Factor.

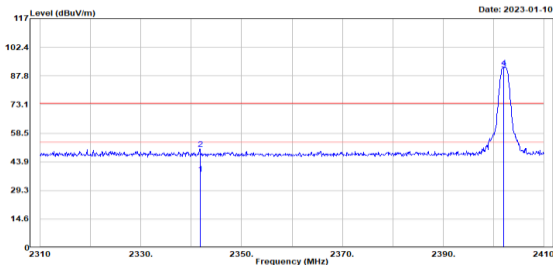
Over Limit = Level – Limit.

Factor = Antenna Factor + Cable Loss – Amplifier Gain.

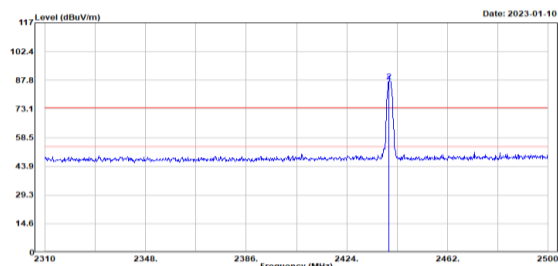
Spurious emissions more than 20 dB below the limit were not reported.

**Fundamental:****Low channel****Horizontal**

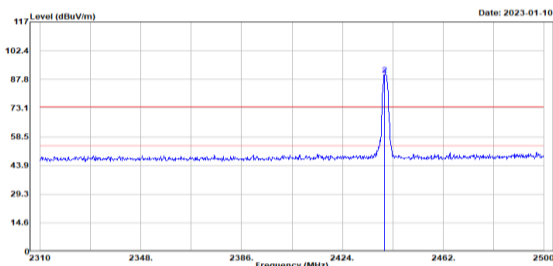
| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2317.508 | 43.08   | -5.00  | 38.08  | 54.00  | -15.92 | 132    | 16     | Average |
| 2317.508 | 54.90   | -5.00  | 49.90  | 74.00  | -24.10 | 132    | 16     | Peak    |
| 2402.000 | 91.64   | -4.48  | 87.16  |        |        | 132    | 16     | Average |
| 2402.000 | 92.77   | -4.48  | 88.29  |        |        | 132    | 16     | Peak    |

**Vertical**

| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2341.732 | 42.85   | -4.97  | 37.88  | 54.00  | -16.12 | 147    | 360    | Average |
| 2341.732 | 55.52   | -4.97  | 50.55  | 74.00  | -23.45 | 147    | 360    | Peak    |
| 2402.000 | 95.46   | -4.48  | 90.98  |        |        | 147    | 360    | Average |
| 2402.000 | 96.58   | -4.48  | 92.10  |        |        | 147    | 360    | Peak    |

**Middle channel****Horizontal**

| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2440.000 | 90.34   | -4.20  | 86.14  |        |        | 137    | 360    | Average |
| 2440.000 | 91.48   | -4.20  | 87.28  |        |        | 137    | 360    | Peak    |

**Vertical**

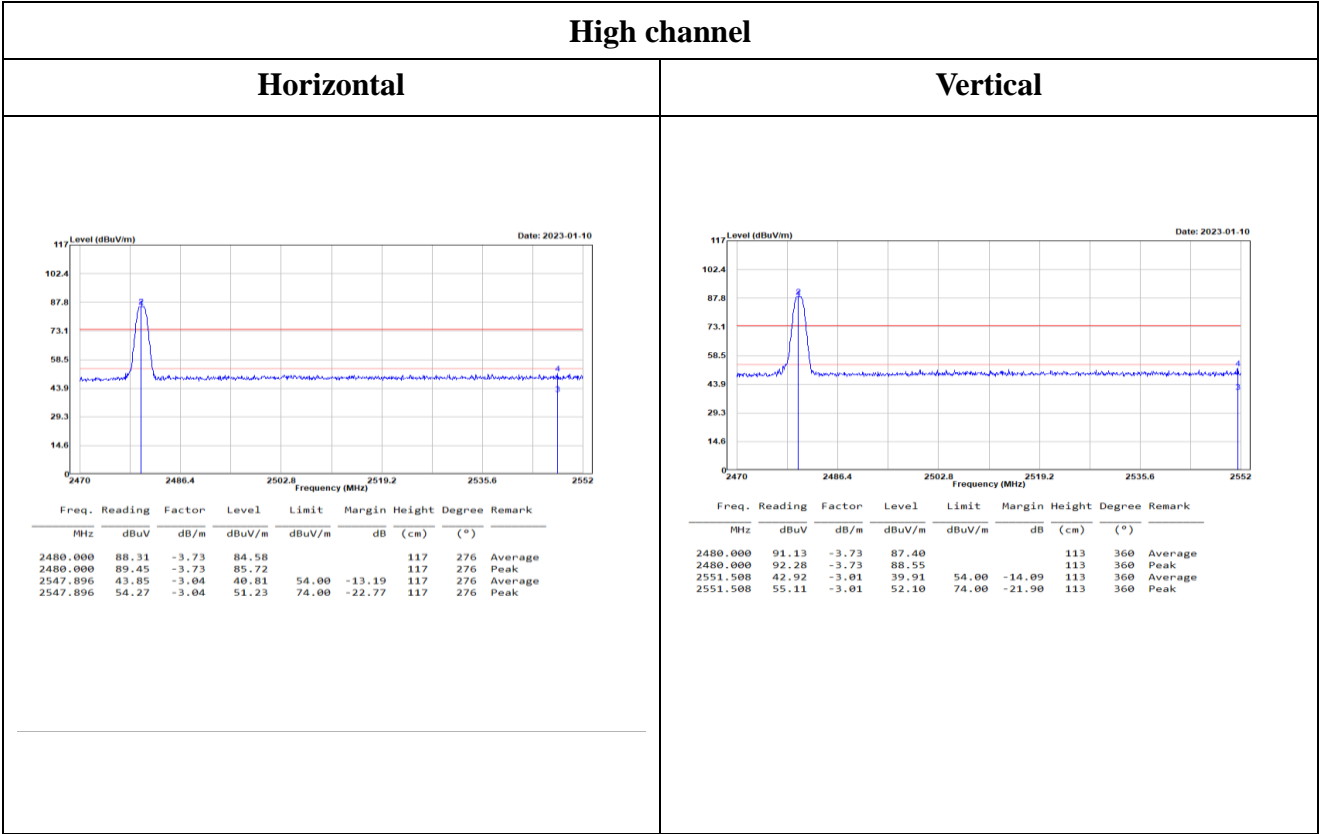
| Freq.    | Reading | Factor | Level  | Limit  | Margin | Height | Degree | Remark  |
|----------|---------|--------|--------|--------|--------|--------|--------|---------|
| MHz      | dBuV    | dB/m   | dBuV/m | dBuV/m | dB     | (cm)   | (°)    |         |
| 2440.000 | 93.21   | -4.20  | 89.01  |        |        | 147    | 340    | Average |
| 2440.000 | 94.40   | -4.20  | 90.20  |        |        | 147    | 340    | Peak    |

Level (Result) = Reading + Factor.

Over Limit = Level – Limit.

Factor = Antenna Factor + Cable Loss – Amplifier Gain.

Spurious emissions more than 20 dB below the limit were not reported.



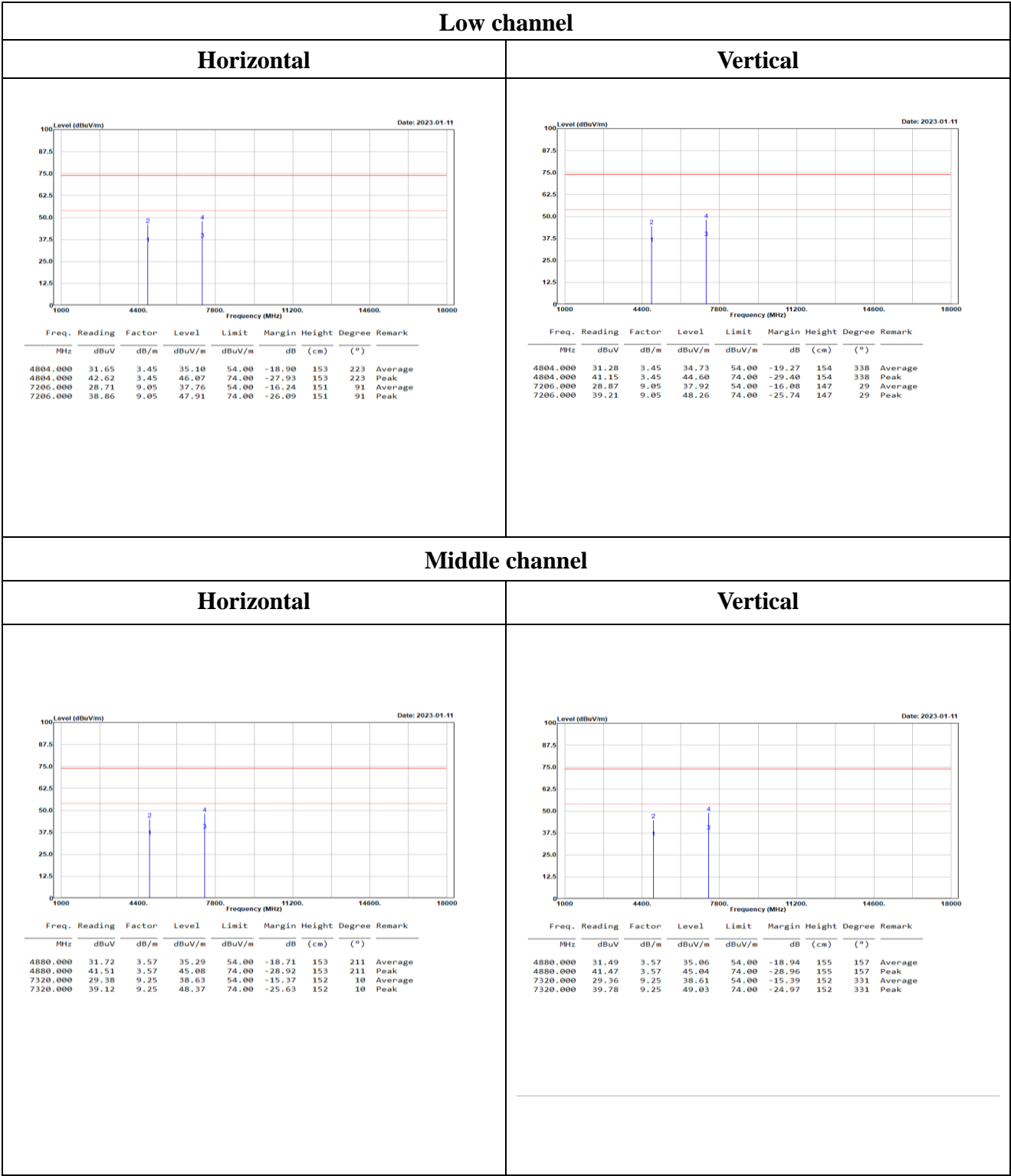
Level (Result) = Reading + Factor.

Over Limit = Level – Limit.

Factor = Antenna Factor + Cable Loss – Amplifier Gain.

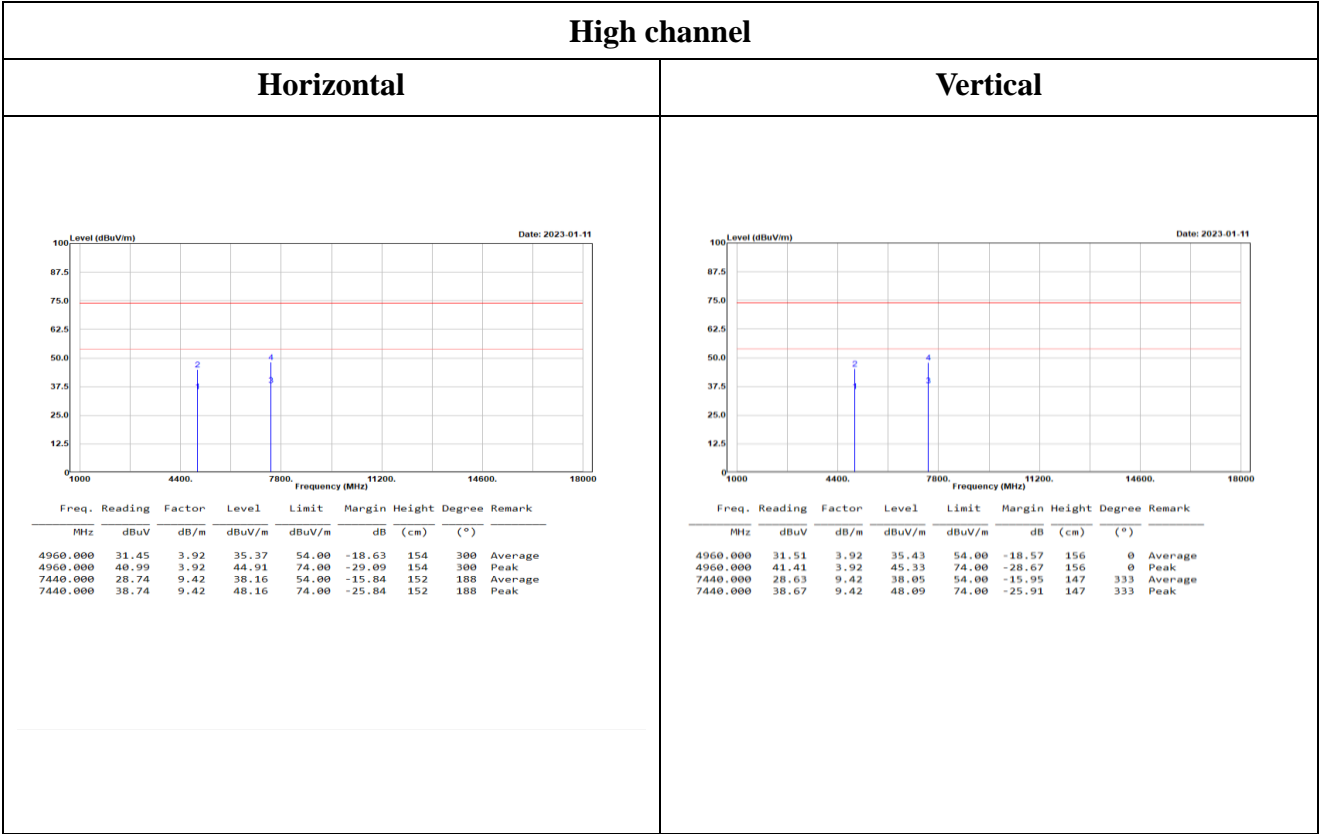
Spurious emissions more than 20 dB below the limit were not reported.

1GHz-18GHz:



Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.





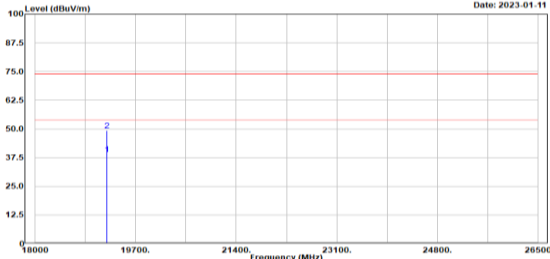
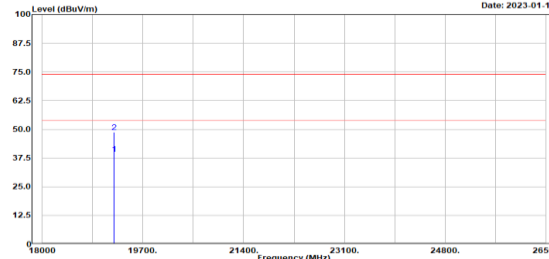
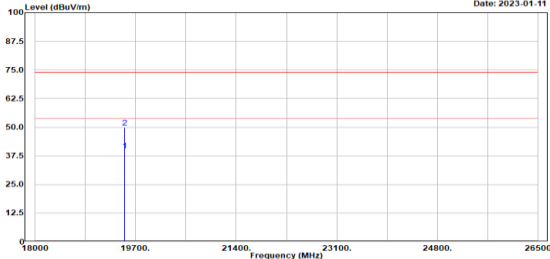
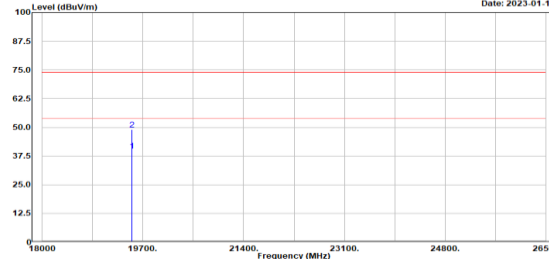
Level (Result) = Reading + Factor.

Over Limit = Level – Limit.

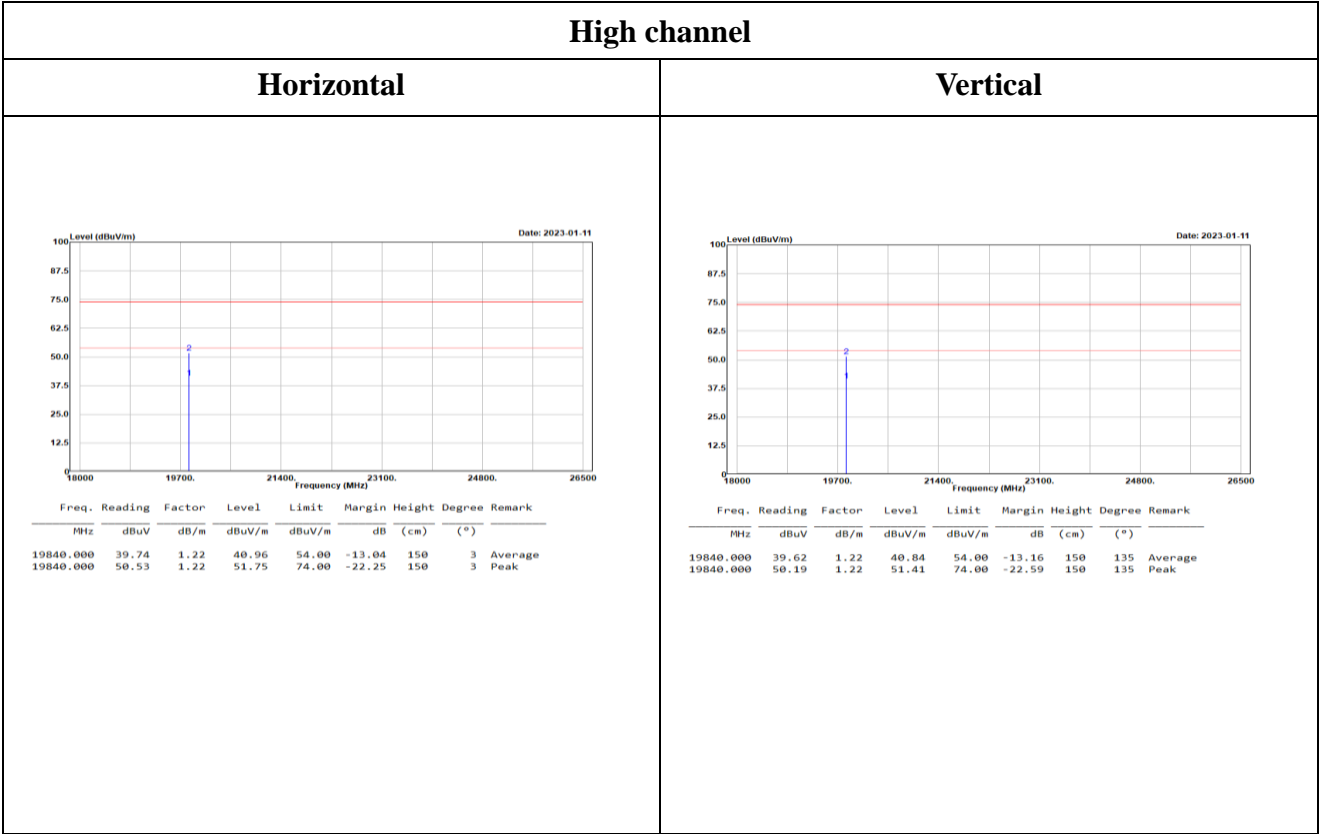
Factor = Antenna Factor + Cable Loss – Amplifier Gain.

Spurious emissions more than 20 dB below the limit were not reported.

18GHz-26.5GHz:

| Low channel  |         |        |        |        |          |         |        |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
|--|---------|--------|--------|--------|----------|---------|--------|---------|-------|--------|--------|--------|--------|-----|------|------|--------|--------|----|------|-----|--|-----------|-------|-------|-------|-------|--------|-----|-----|---------|-----------|-------|-------|-------|-------|--------|-----|-----|------|---|--|--|--|-------|---------|--------|-------|-------|--------|--------|--------|--------|-----|------|------|--------|--------|----|------|-----|--|-----------|-------|-------|-------|-------|--------|-----|-----|---------|-----------|-------|-------|-------|-------|--------|-----|-----|------|
| Horizontal   |         |        |        |        | Vertical |         |        |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| <div><table><tr><th>Freq.</th><th>Reading</th><th>Factor</th><th>Level</th><th>Limit</th><th>Margin</th><th>Height</th><th>Degree</th><th>Remark</th></tr><tr><th>MHz</th><th>dBuV</th><th>dB/m</th><th>dBuV/m</th><th>dBuV/m</th><th>dB</th><th>(cm)</th><th>(°)</th><th></th></tr><tr><td>19216.000</td><td>39.68</td><td>-0.57</td><td>39.11</td><td>54.00</td><td>-14.89</td><td>150</td><td>75</td><td>Average</td></tr><tr><td>19216.000</td><td>49.85</td><td>-0.57</td><td>49.28</td><td>74.00</td><td>-24.72</td><td>150</td><td>75</td><td>Peak</td></tr></table></div>   |         |        |        |        | Freq.    | Reading | Factor | Level   | Limit | Margin | Height | Degree | Remark | MHz | dBuV | dB/m | dBuV/m | dBuV/m | dB | (cm) | (°) |  | 19216.000 | 39.68 | -0.57 | 39.11 | 54.00 | -14.89 | 150 | 75  | Average | 19216.000 | 49.85 | -0.57 | 49.28 | 74.00 | -24.72 | 150 | 75  | Peak | <div><table><tr><th>Freq.</th><th>Reading</th><th>Factor</th><th>Level</th><th>Limit</th><th>Margin</th><th>Height</th><th>Degree</th><th>Remark</th></tr><tr><th>MHz</th><th>dBuV</th><th>dB/m</th><th>dBuV/m</th><th>dBuV/m</th><th>dB</th><th>(cm)</th><th>(°)</th><th></th></tr><tr><td>19216.000</td><td>39.88</td><td>-0.57</td><td>39.31</td><td>54.00</td><td>-14.69</td><td>150</td><td>127</td><td>Average</td></tr><tr><td>19216.000</td><td>49.39</td><td>-0.57</td><td>48.82</td><td>74.00</td><td>-25.18</td><td>150</td><td>127</td><td>Peak</td></tr></table></div> |  |  |  | Freq. | Reading | Factor | Level | Limit | Margin | Height | Degree | Remark | MHz | dBuV | dB/m | dBuV/m | dBuV/m | dB | (cm) | (°) |  | 19216.000 | 39.88 | -0.57 | 39.31 | 54.00 | -14.69 | 150 | 127 | Average | 19216.000 | 49.39 | -0.57 | 48.82 | 74.00 | -25.18 | 150 | 127 | Peak |
| Freq.  | Reading | Factor | Level  | Limit  | Margin   | Height  | Degree | Remark  |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| MHz  | dBuV    | dB/m   | dBuV/m | dBuV/m | dB       | (cm)    | (°)    |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19216.000  | 39.68   | -0.57  | 39.11  | 54.00  | -14.89   | 150     | 75     | Average |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19216.000  | 49.85   | -0.57  | 49.28  | 74.00  | -24.72   | 150     | 75     | Peak    |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| Freq.  | Reading | Factor | Level  | Limit  | Margin   | Height  | Degree | Remark  |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| MHz  | dBuV    | dB/m   | dBuV/m | dBuV/m | dB       | (cm)    | (°)    |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19216.000  | 39.88   | -0.57  | 39.31  | 54.00  | -14.69   | 150     | 127    | Average |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19216.000  | 49.39   | -0.57  | 48.82  | 74.00  | -25.18   | 150     | 127    | Peak    |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| Middle channel   |         |        |        |        |          |         |        |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| Horizontal   |         |        |        |        | Vertical |         |        |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| <div><table><tr><th>Freq.</th><th>Reading</th><th>Factor</th><th>Level</th><th>Limit</th><th>Margin</th><th>Height</th><th>Degree</th><th>Remark</th></tr><tr><th>MHz</th><th>dBuV</th><th>dB/m</th><th>dBuV/m</th><th>dBuV/m</th><th>dB</th><th>(cm)</th><th>(°)</th><th></th></tr><tr><td>19520.000</td><td>39.42</td><td>0.34</td><td>39.76</td><td>54.00</td><td>-14.24</td><td>150</td><td>270</td><td>Average</td></tr><tr><td>19520.000</td><td>49.45</td><td>0.34</td><td>49.79</td><td>74.00</td><td>-24.21</td><td>150</td><td>270</td><td>Peak</td></tr></table></div> |         |        |        |        | Freq.    | Reading | Factor | Level   | Limit | Margin | Height | Degree | Remark | MHz | dBuV | dB/m | dBuV/m | dBuV/m | dB | (cm) | (°) |  | 19520.000 | 39.42 | 0.34  | 39.76 | 54.00 | -14.24 | 150 | 270 | Average | 19520.000 | 49.45 | 0.34  | 49.79 | 74.00 | -24.21 | 150 | 270 | Peak | <div><table><tr><th>Freq.</th><th>Reading</th><th>Factor</th><th>Level</th><th>Limit</th><th>Margin</th><th>Height</th><th>Degree</th><th>Remark</th></tr><tr><th>MHz</th><th>dBuV</th><th>dB/m</th><th>dBuV/m</th><th>dBuV/m</th><th>dB</th><th>(cm)</th><th>(°)</th><th></th></tr><tr><td>19520.000</td><td>39.47</td><td>0.34</td><td>39.81</td><td>54.00</td><td>-14.19</td><td>150</td><td>96</td><td>Average</td></tr><tr><td>19520.000</td><td>48.77</td><td>0.34</td><td>49.11</td><td>74.00</td><td>-24.89</td><td>150</td><td>96</td><td>Peak</td></tr></table></div>   |  |  |  | Freq. | Reading | Factor | Level | Limit | Margin | Height | Degree | Remark | MHz | dBuV | dB/m | dBuV/m | dBuV/m | dB | (cm) | (°) |  | 19520.000 | 39.47 | 0.34  | 39.81 | 54.00 | -14.19 | 150 | 96  | Average | 19520.000 | 48.77 | 0.34  | 49.11 | 74.00 | -24.89 | 150 | 96  | Peak |
| Freq.  | Reading | Factor | Level  | Limit  | Margin   | Height  | Degree | Remark  |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| MHz  | dBuV    | dB/m   | dBuV/m | dBuV/m | dB       | (cm)    | (°)    |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19520.000  | 39.42   | 0.34   | 39.76  | 54.00  | -14.24   | 150     | 270    | Average |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19520.000  | 49.45   | 0.34   | 49.79  | 74.00  | -24.21   | 150     | 270    | Peak    |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| Freq.  | Reading | Factor | Level  | Limit  | Margin   | Height  | Degree | Remark  |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| MHz  | dBuV    | dB/m   | dBuV/m | dBuV/m | dB       | (cm)    | (°)    |         |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19520.000  | 39.47   | 0.34   | 39.81  | 54.00  | -14.19   | 150     | 96     | Average |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |
| 19520.000  | 48.77   | 0.34   | 49.11  | 74.00  | -24.89   | 150     | 96     | Peak    |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |   |  |  |  |       |         |        |       |       |        |        |        |        |     |      |      |        |        |    |      |     |  |           |       |       |       |       |        |     |     |         |           |       |       |       |       |        |     |     |      |

Level (Result) = Reading + Factor.  
Over Limit = Level – Limit.  
Factor = Antenna Factor + Cable Loss – Amplifier Gain.  
Spurious emissions more than 20 dB below the limit were not reported.



Level (Result) = Reading + Factor.

Over Limit = Level – Limit.

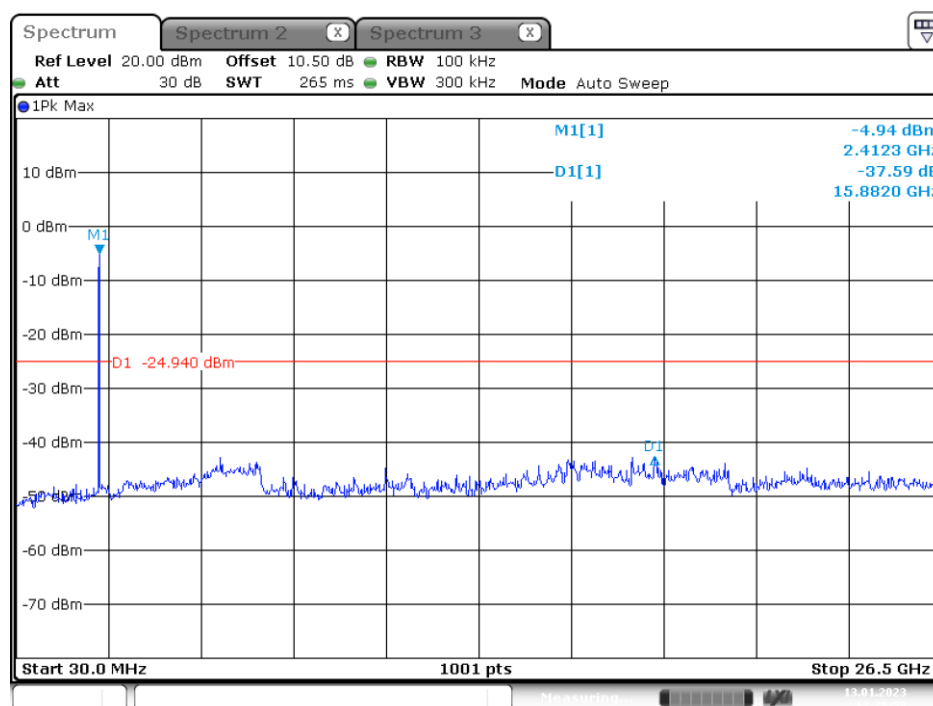
Factor = Antenna Factor + Cable Loss – Amplifier Gain.

Spurious emissions more than 20 dB below the limit were not reported.

**Conducted Spurious Emissions:**

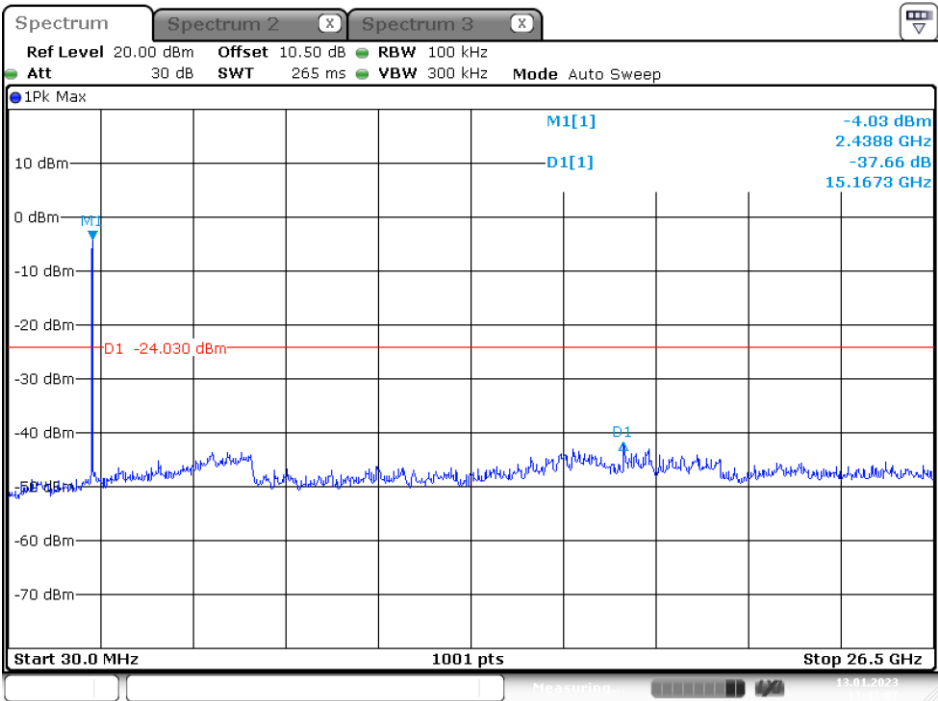
| Channel  | Frequency (MHz) | Delta Peak to Band Emission (dBc) | Limit (dBc) | Result |
|----------|-----------------|-----------------------------------|-------------|--------|
| B Mode   |                 |                                   |             |        |
| Low      | 2412            | 37.59                             | $\geq 20$   | PASS   |
| Middle   | 2437            | 37.66                             | $\geq 20$   | PASS   |
| High     | 2462            | 38.59                             | $\geq 20$   | PASS   |
| BLE Mode |                 |                                   |             |        |
| Low      | 2402            | 31.05                             | $\geq 20$   | PASS   |
| Mid      | 2440            | 30.91                             | $\geq 20$   | PASS   |
| High     | 2480            | 31.23                             | $\geq 20$   | PASS   |

**B Mode**  
**Low Channel**



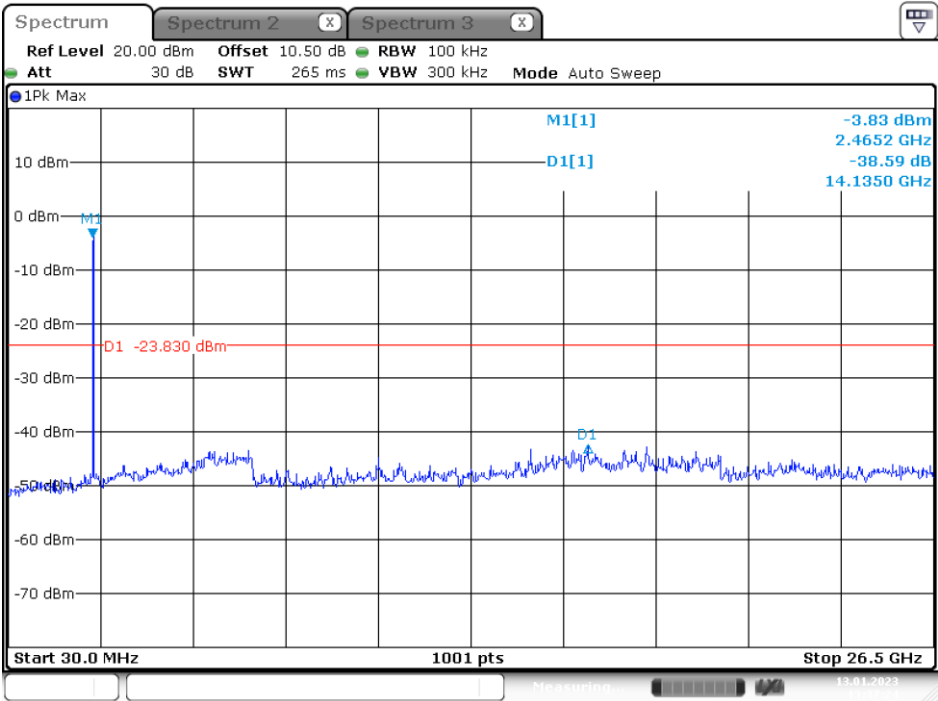
Date: 13.JAN.2023 13:29:00

Middle Channel



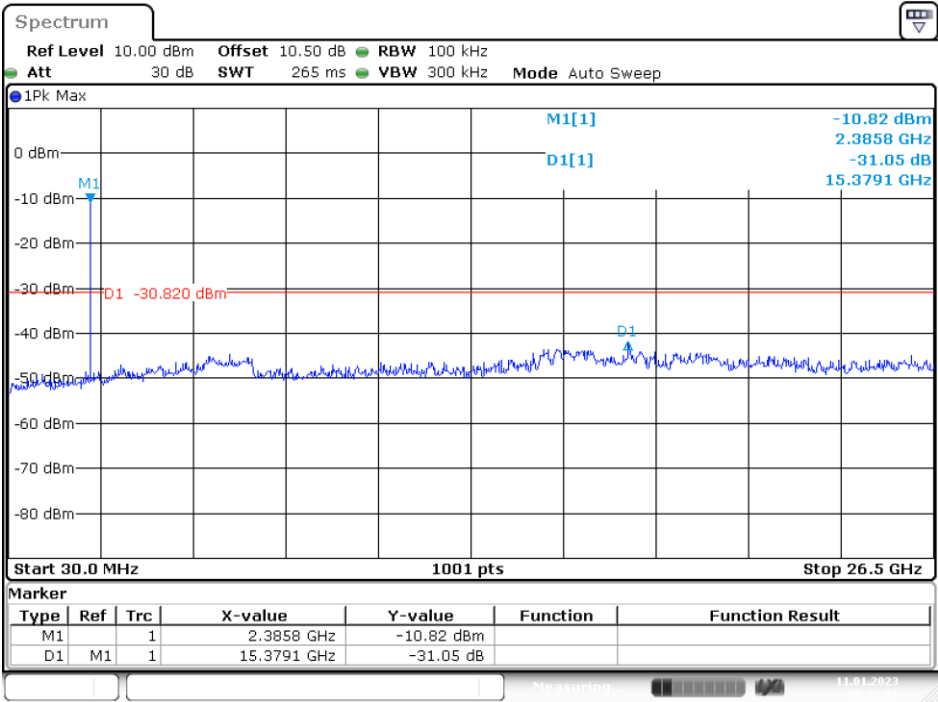
Date: 13.JAN.2023 13:43:08

High Channel



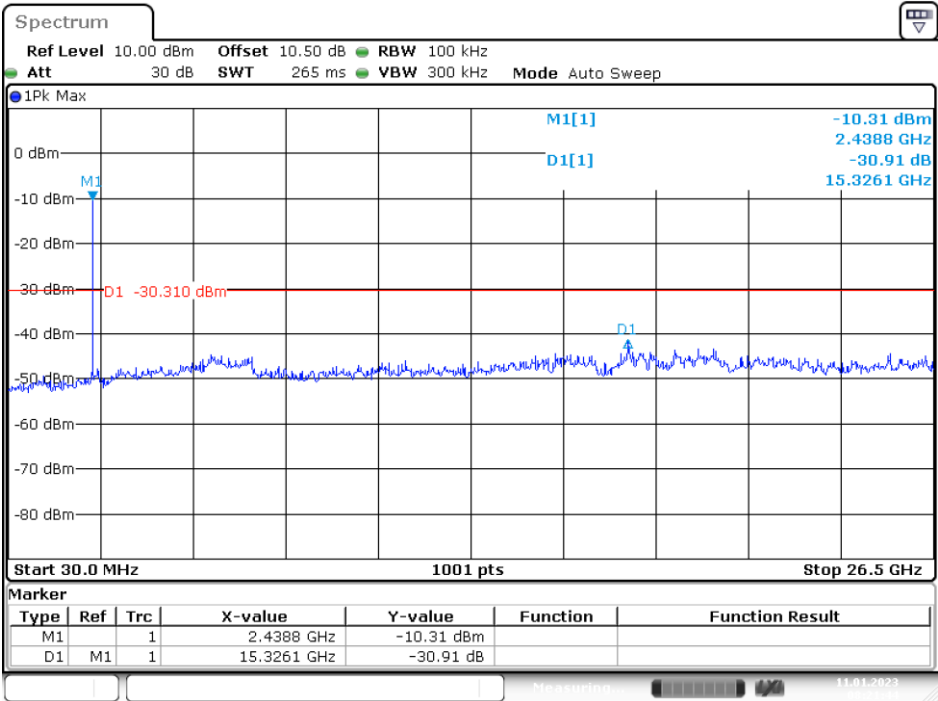
Date: 13.JAN.2023 13:37:24

BLE Mode  
Low Channel



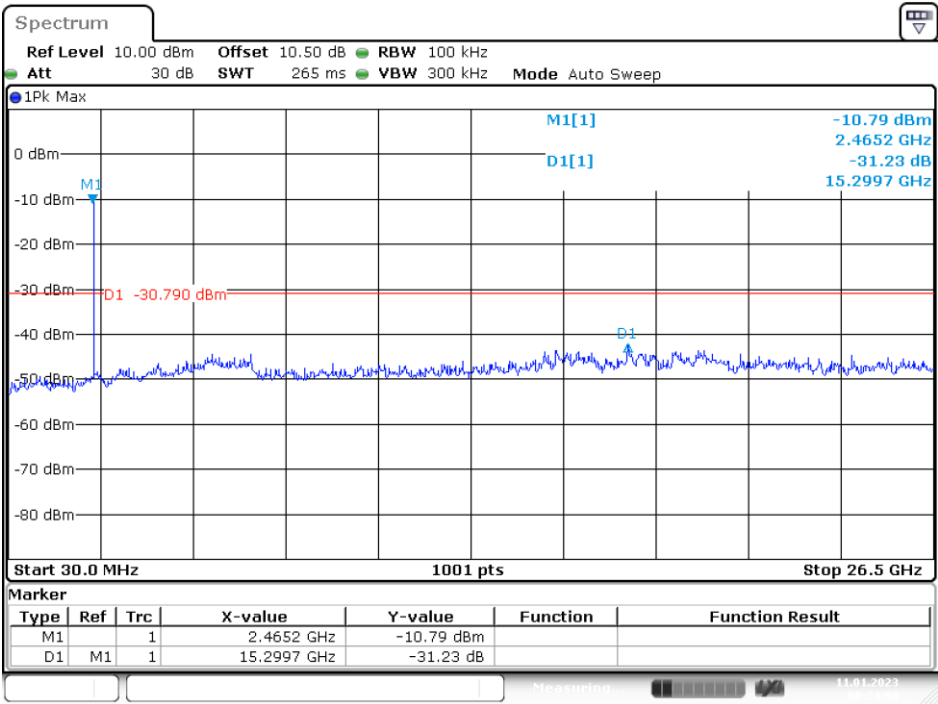
Date: 11.JAN.2023 08:33:01

Middle Channel



Date: 11.JAN.2023 08:21:44

High Channel



Date: 11.JAN.2023 08:24:01

## **10 FCC §15.247(a)(2) & RSS-247 §5.2(a), RSS-GEN §6.7 – 6 dB Emission Bandwidth & Occupied Bandwidth**

### **10.1 Applicable Standard**

According to FCC §15.247(a)(2).

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.

According to RSS-247 §5.2 (a)

The minimum 6 dB bandwidth shall be 500 kHz.

According to RSS-GEN §6.7

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.

### **10.2 Test Procedure**

The steps for the first option are as follows:

- a) Set RBW = 100 kHz.
- b) Set the VBW  $\geq [3 \times \text{RBW}]$ .
- c) Detector = peak.
- d) Trace mode = max hold.
- e) Sweep = auto couple.
- f) Allow the trace to stabilize.
- g) Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

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).



### 10.3 Test Results

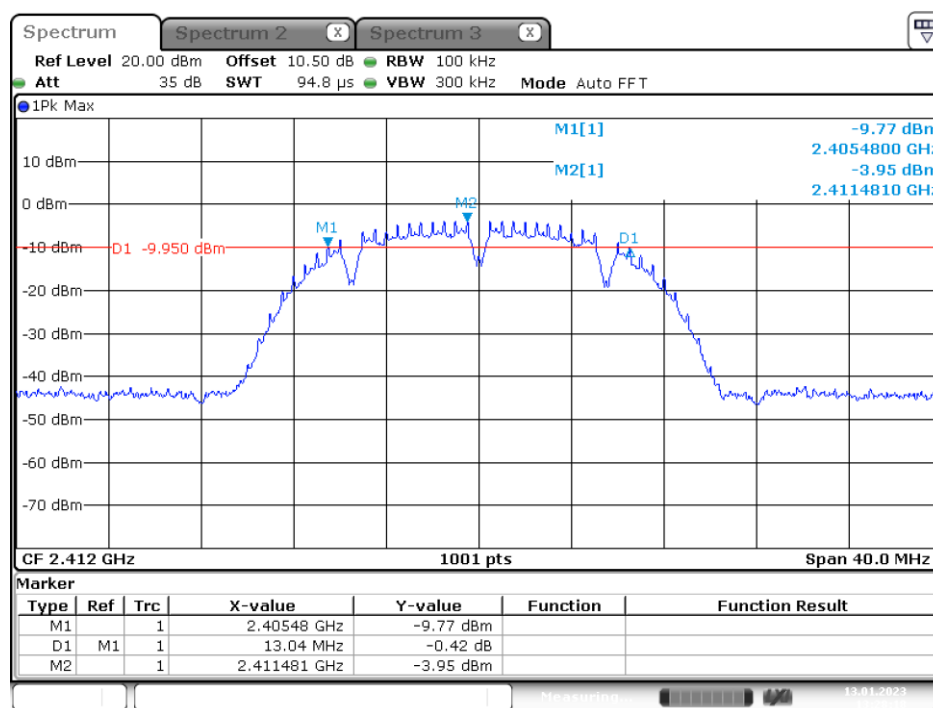
| Channel  | Frequency (MHz) | 6 dB Emission Bandwidth (MHz) | 99% Bandwidth (MHz) | Limit (kHz) | Result |
|----------|-----------------|-------------------------------|---------------------|-------------|--------|
| B Mode   |                 |                               |                     |             |        |
| Low      | 2412            | 13.04                         | 15.34               | > 500       | PASS   |
| Middle   | 2437            | 13.04                         | 15.34               | > 500       | PASS   |
| High     | 2462            | 13.04                         | 15.38               | > 500       | PASS   |
| BLE Mode |                 |                               |                     |             |        |
| Low      | 2402            | 0.723                         | 1.04                | ≥500        | PASS   |
| Mid      | 2440            | 0.723                         | 1.05                | ≥500        | PASS   |
| High     | 2480            | 0.726                         | 1.05                | ≥500        | PASS   |

Please refer to the following plots

### B Mode

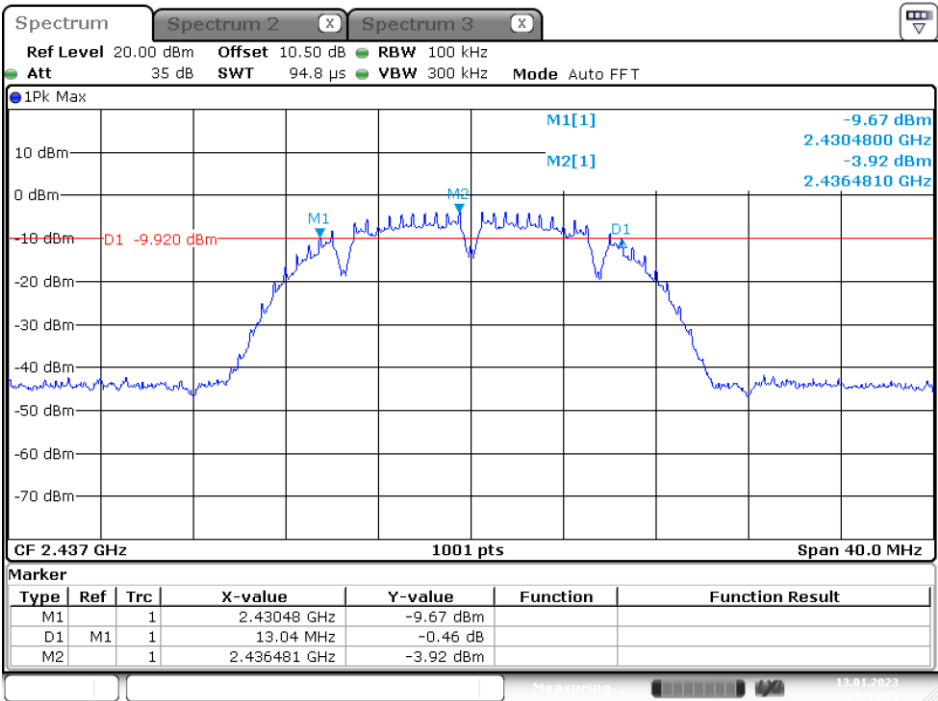
#### 6 dB Emission Bandwidth

#### Low Channel



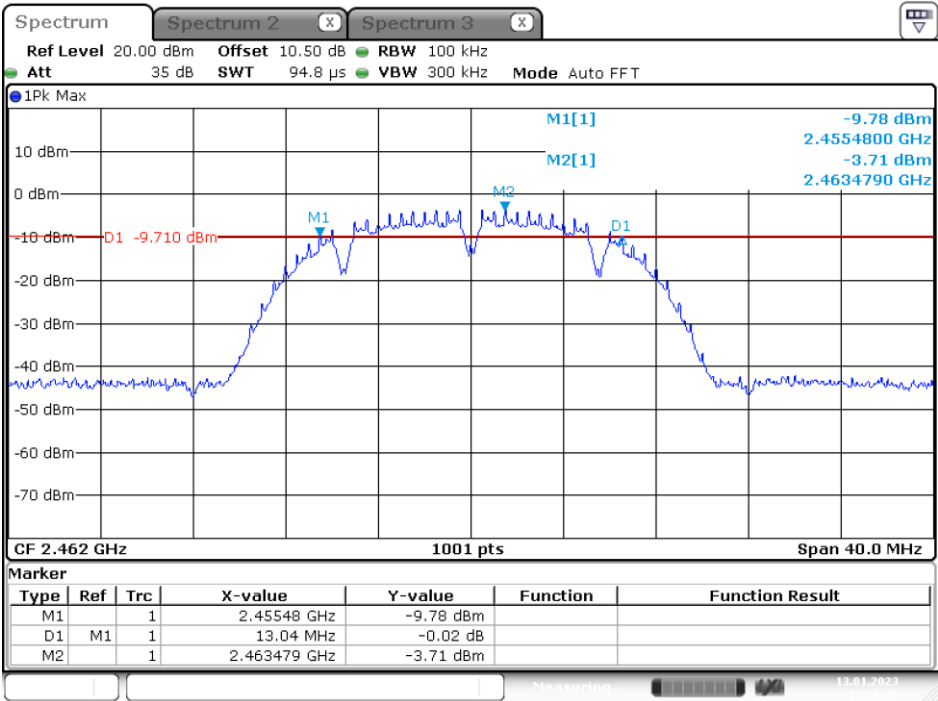
Date: 13.JAN.2023 13:28:19

Middle Channel



Date: 13.JAN.2023 13:33:03

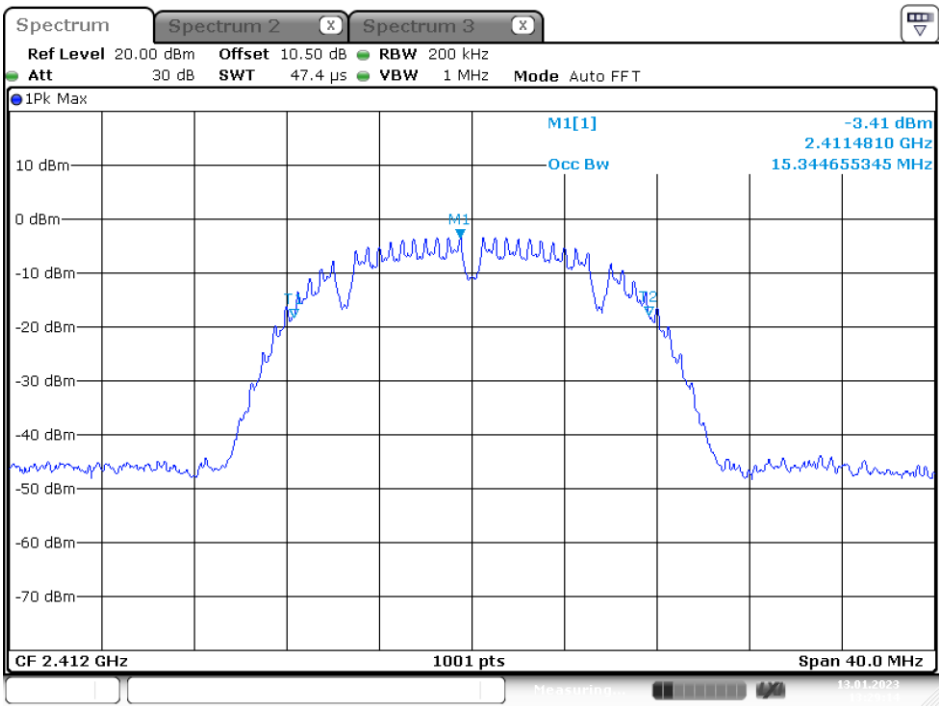
High Channel



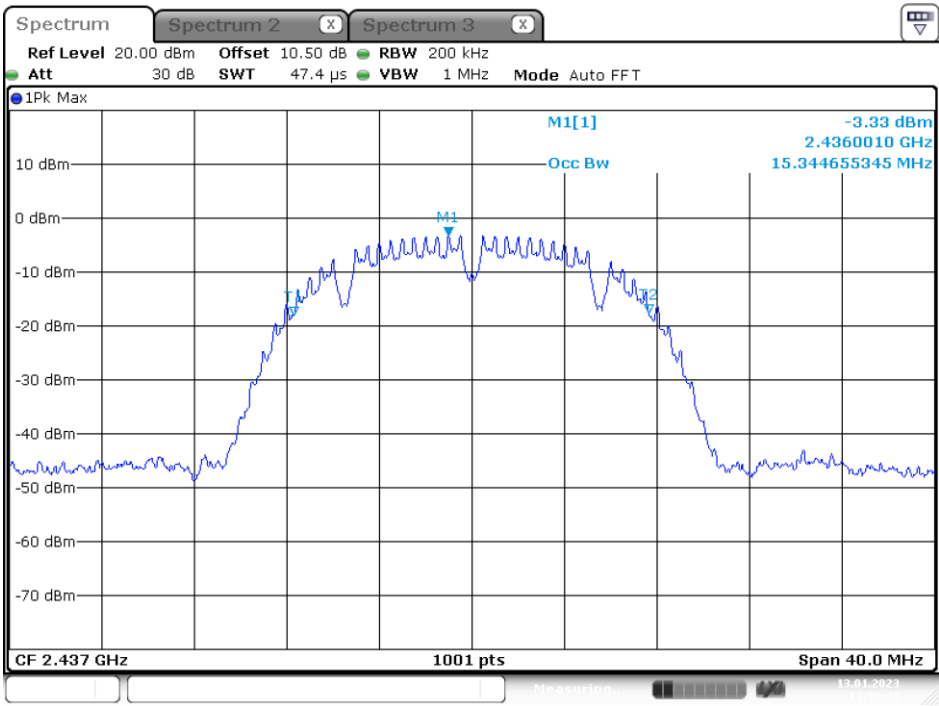
Date: 13.JAN.2023 13:36:44

99% Bandwidth

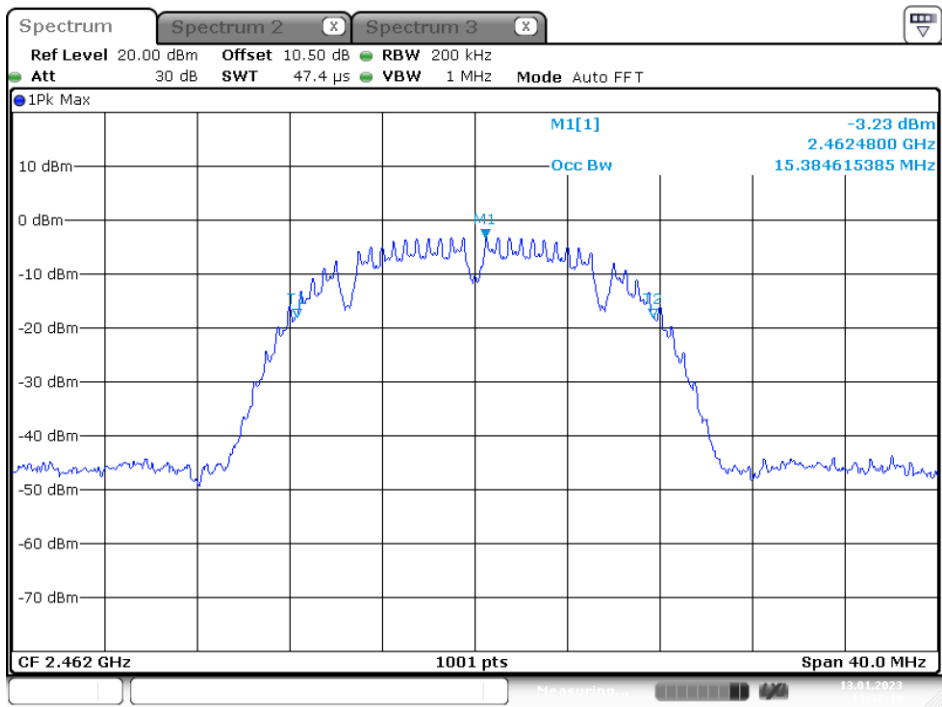
Low Channel



Middle Channel



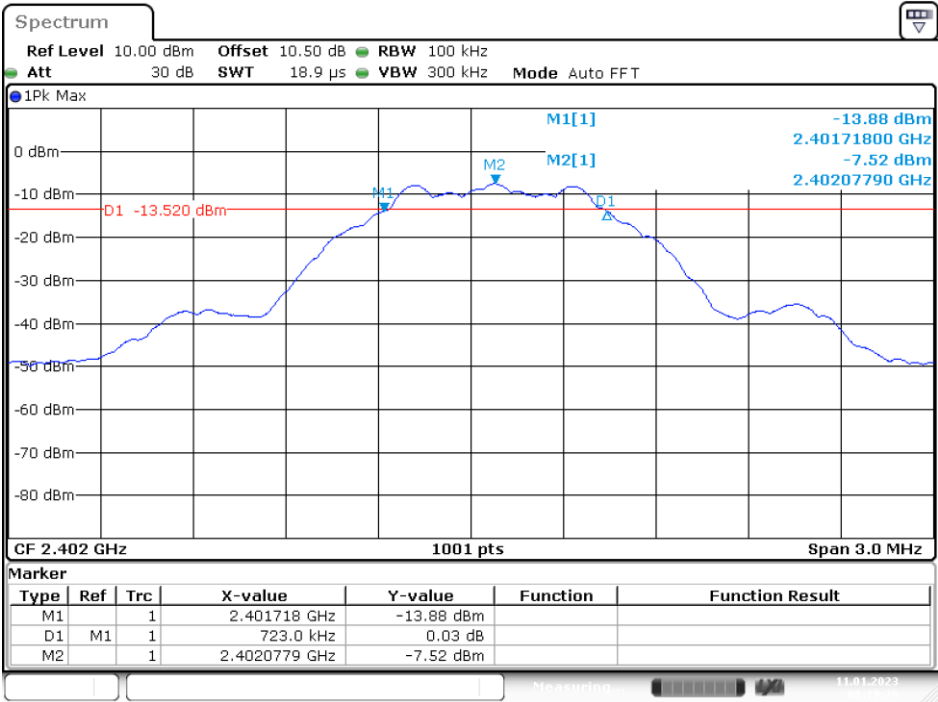
High Channel



BLE

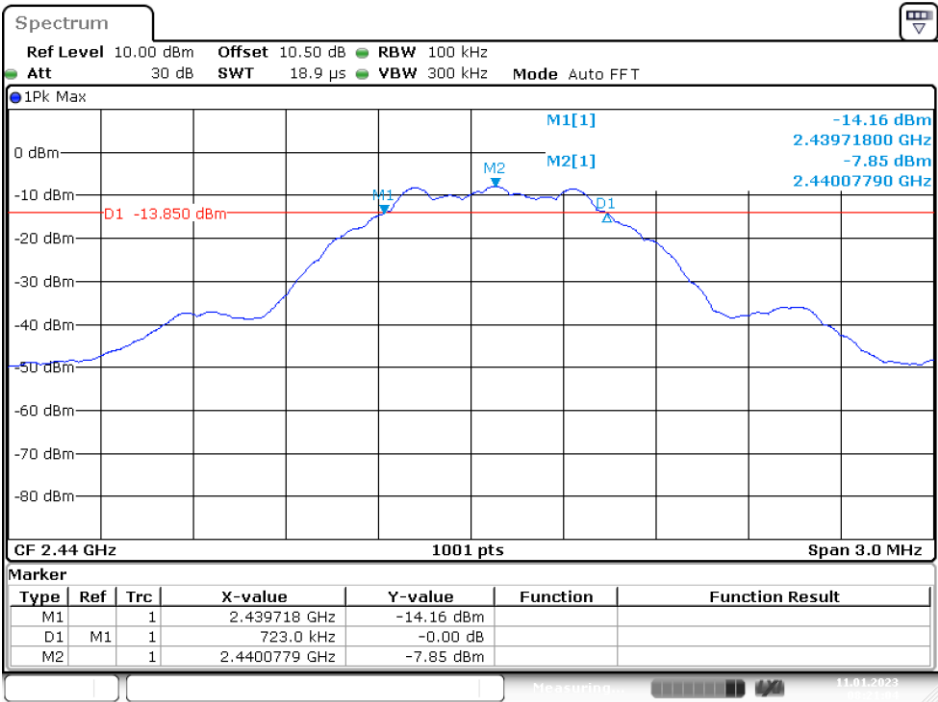
6 dB Emission Bandwidth

Low Channel



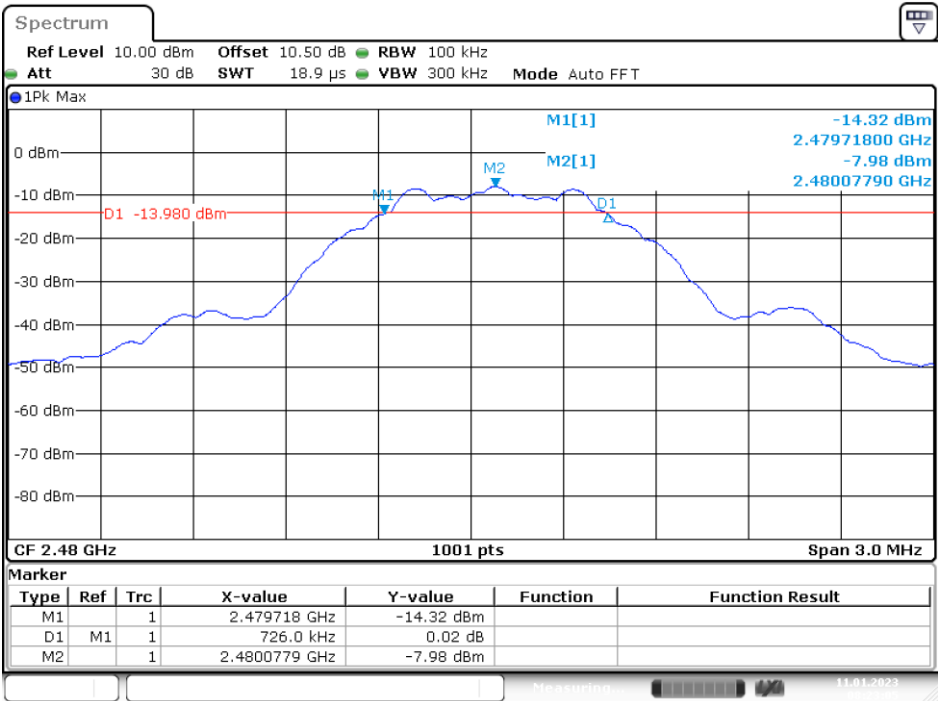
Date: 11.JAN.2023 08:19:27

Middle Channel



Date: 11.JAN.2023 08:21:04

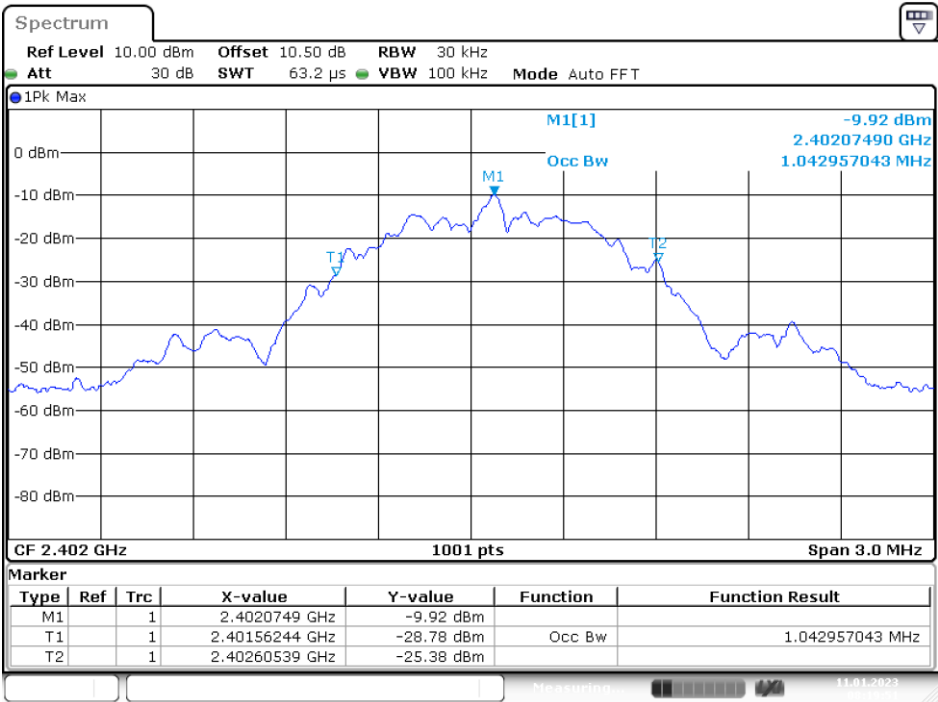
High Channel



Date: 11.JAN.2023 08:23:05

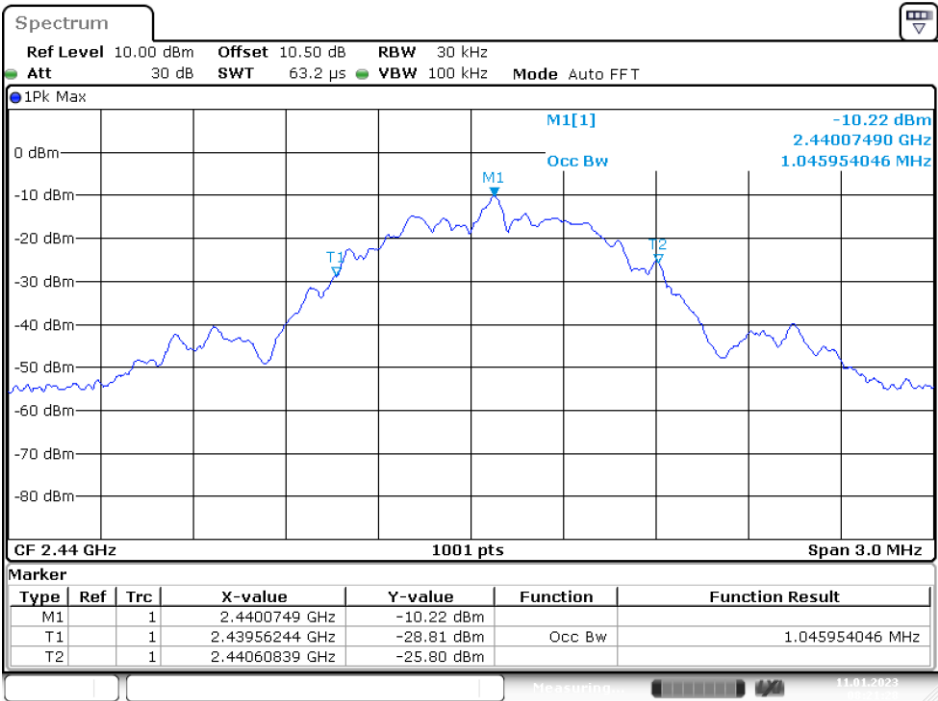
99% Bandwidth

Low Channel



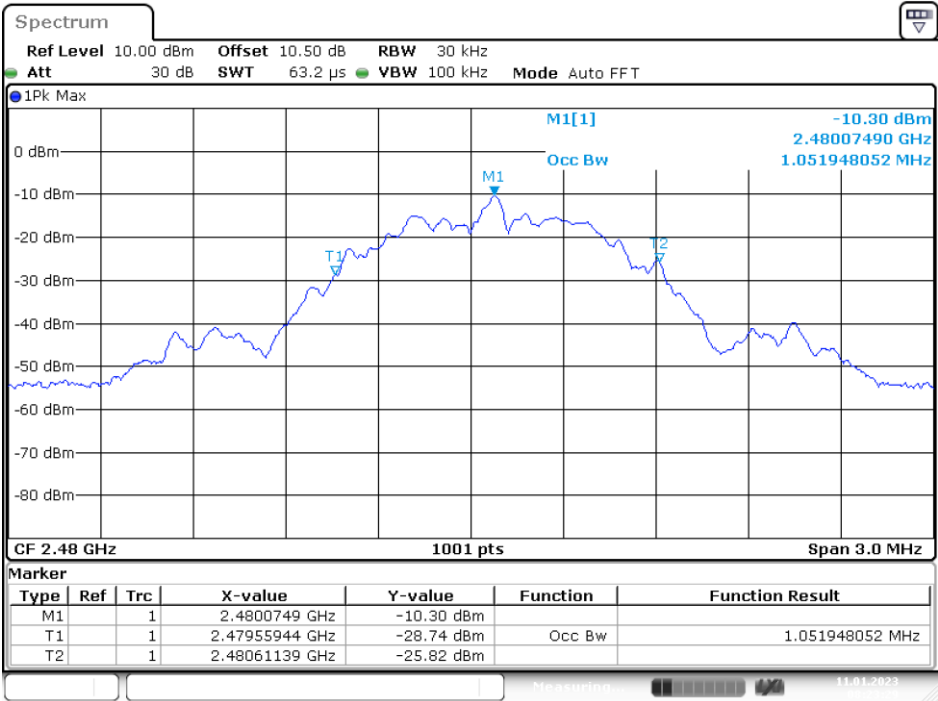
Date: 11.JAN.2023 08:19:51

Middle Channel



Date: 11.JAN.2023 08:21:29

High Channel



Date: 11.JAN.2023 08:23:29

## **11 FCC §15.247(b)(3) & RSS-247 §5.4(d) – Maximum Output Power**

### **11.1 Applicable Standard**

According to FCC §15.247(b) (3).

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.

According to RSS-247 §5.4(d).

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.

### **11.2 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 measuring equipment.



### 11.3 Test Results

#### Conducted Peak Output Power

| Channel  | Frequency<br>(MHz) | Power<br>(dBm) | Limit<br>(dBm) | Antenna<br>Gain<br>(dBi) | EIRP<br>Power<br>(dBm) | EIRP Power<br>Limit<br>(dBm) |
|----------|--------------------|----------------|----------------|--------------------------|------------------------|------------------------------|
| B Mode   |                    |                |                |                          |                        |                              |
| Low      | 2412               | 8.36           | 30             | 2.29                     | 10.650                 | 36                           |
| Middle   | 2437               | 8.48           | 30             | 2.29                     | 10.770                 | 36                           |
| High     | 2462               | 8.56           | 30             | 2.29                     | 10.850                 | 36                           |
| BLE Mode |                    |                |                |                          |                        |                              |
| Low      | 2402               | -5.83          | 30             | 2.29                     | -3.540                 | 36                           |
| Mid      | 2440               | -5.91          | 30             | 2.29                     | -3.620                 | 36                           |
| High     | 2480               | -6.12          | 30             | 2.29                     | -3.830                 | 36                           |

## **12 FCC §15.247(d) & RSS-247 §5.5 – 100 kHz Bandwidth of Frequency Band Edge**

### **12.1 Applicable Standard**

According to FCC §15.247(d).

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

According to RSS-247 §5.5.

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.

### **12.2 Test Procedure**

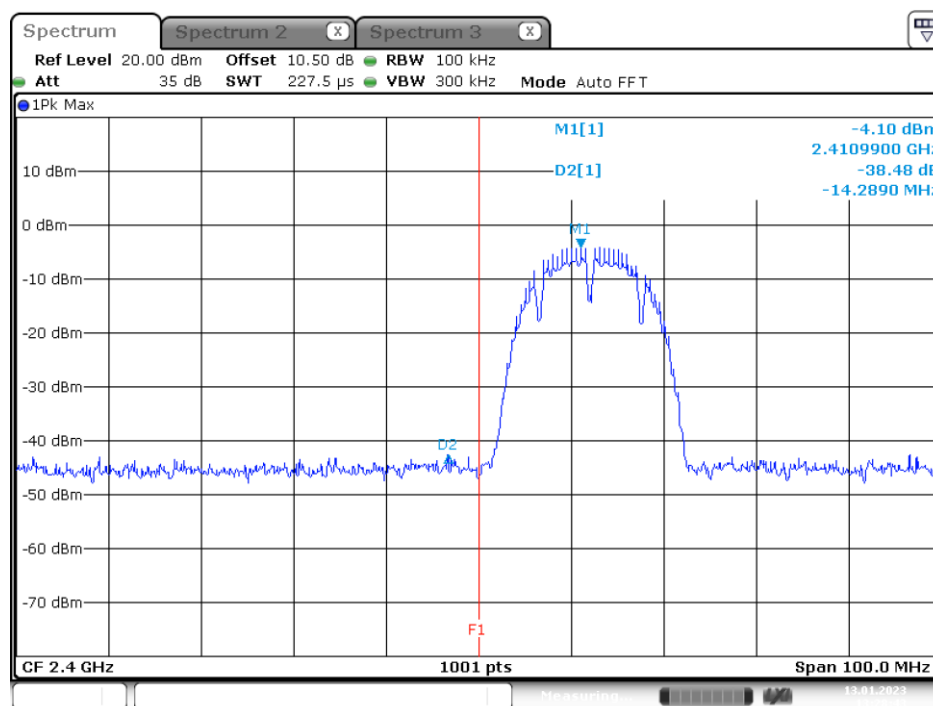
1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect its antenna terminal to measurement instrument via a low loss cable. Then 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.

### 12.3 Test Results

| Channel | Frequency (MHz) | Delta Peak to Band Emission (dBc) | Limit (dBc) | Result |
|---------|-----------------|-----------------------------------|-------------|--------|
| B Mode  |                 |                                   |             |        |
| Low     | 2412            | 38.48                             | $\geq 20$   | PASS   |
| High    | 2462            | 38.68                             | $\geq 20$   | PASS   |
| BLE     |                 |                                   |             |        |
| Low     | 2402            | 40.62                             | $\geq 20$   | PASS   |
| High    | 2480            | 39.78                             | $\geq 20$   | PASS   |

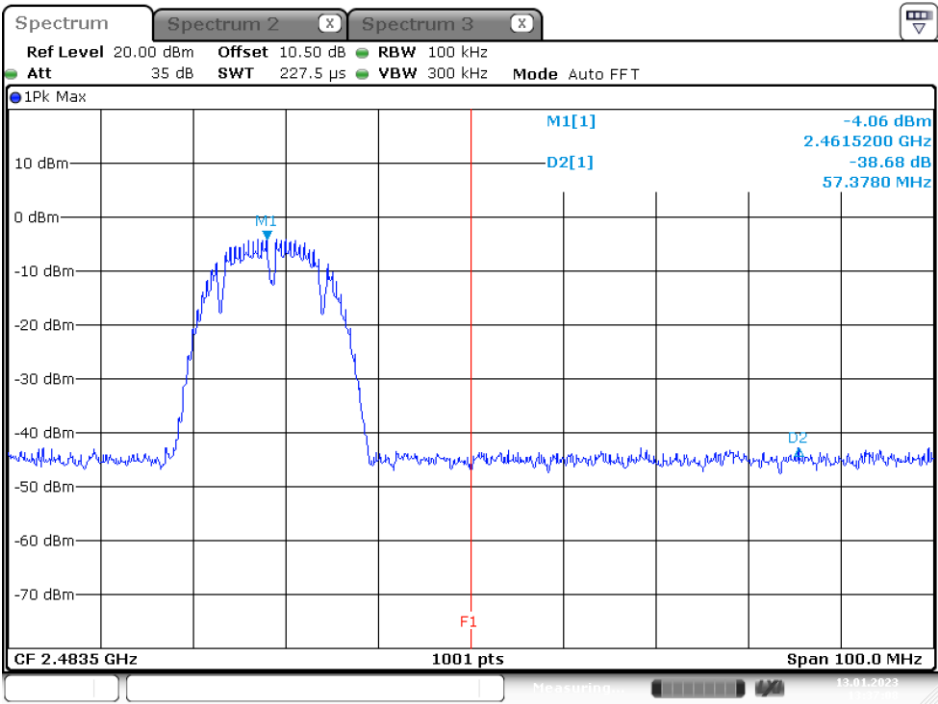
Please refer to the following plots

#### B Mode Band Edge, Left Side

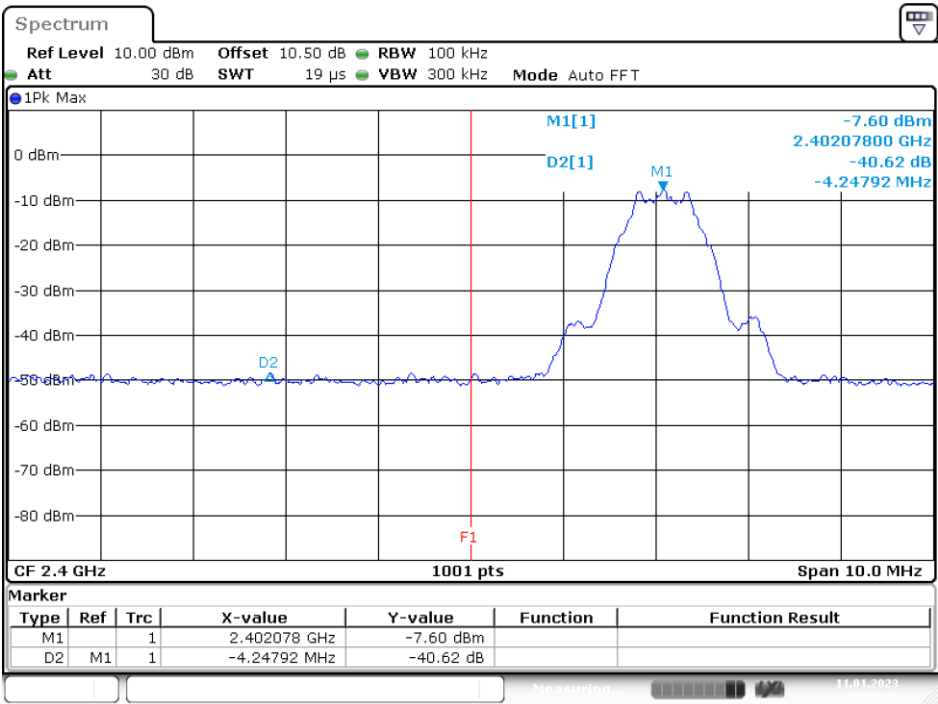


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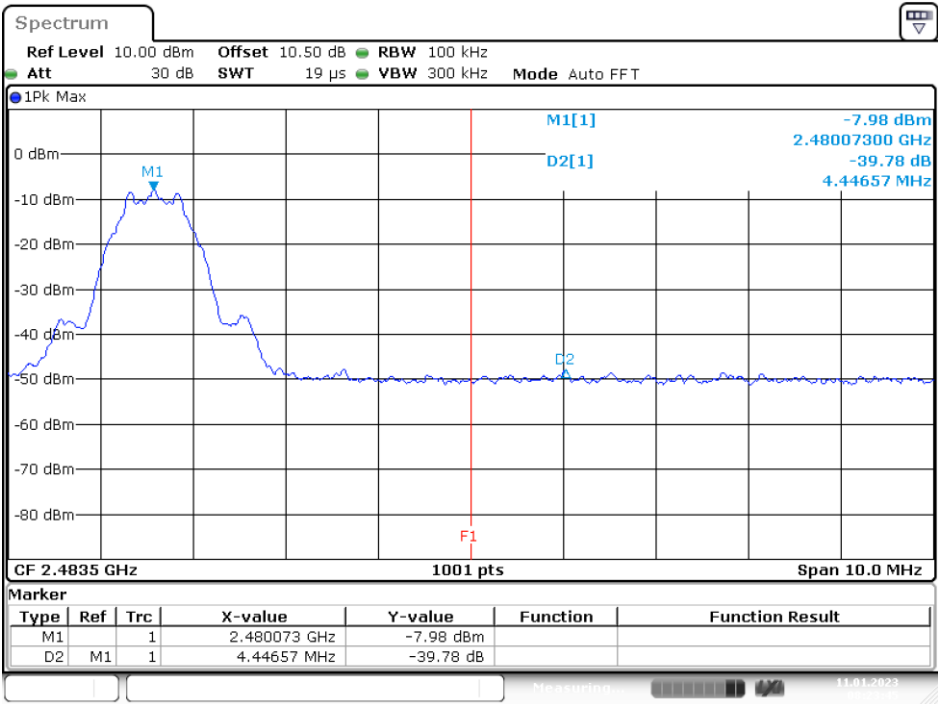
Band Edge, Right Side



BLE Mode  
Band Edge, Left Side



Band Edge, Right Side



Date: 11.JAN.2023 08:23:45

## 13 FCC §15.247(e) & RSS-247 §5.2(b) – Power Spectral Density

### 13.1 Applicable Standard

According to FCC §15.247(e).

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.

According to RSS-247 §5.2(b).

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).

### 13.2 Test Procedure

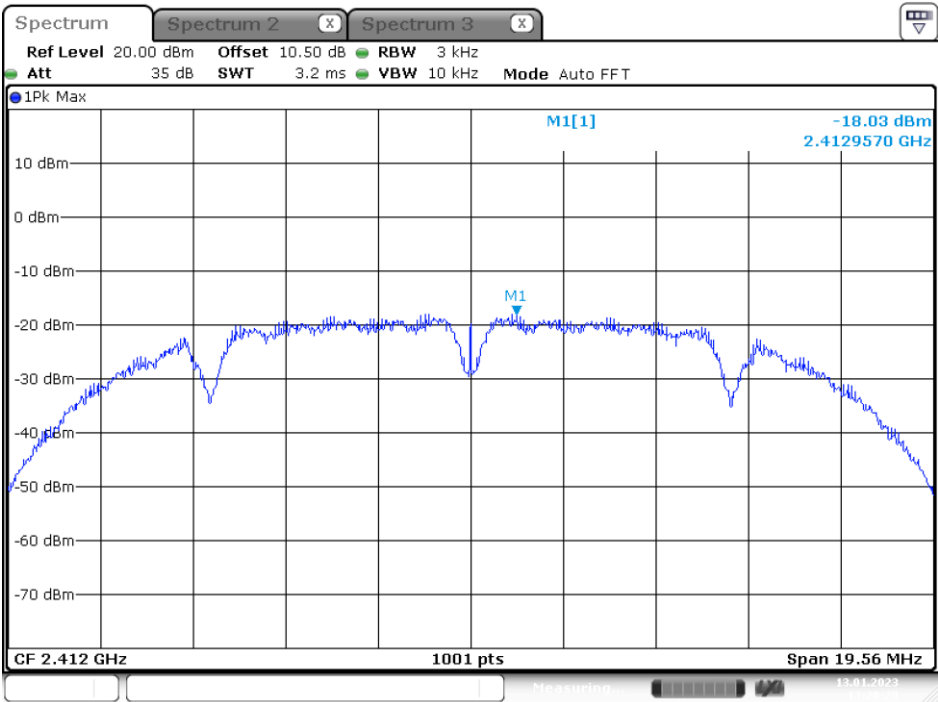
- a) Set analyzer center frequency to DTS channel center frequency.
- b) Set the span to 1.5 times the DTS bandwidth.
- c) Set the RBW to  $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$ .
- d) Set the VBW  $\geq [3 \times \text{RBW}]$ .
- e) Detector = peak.
- f) Sweep time = auto couple.
- g) Trace mode = max hold.
- h) Allow trace to fully stabilize.
- i) Use the peak marker function to determine the maximum amplitude level within the RBW.
- j) If measured value exceeds requirement, then reduce RBW (but no less than 3 kHz) and repeat

13.3Test Results

| Channel  | Frequency<br>(MHz) | Power Spectral Density<br>(dBm/3 kHz) | Limit<br>(dBm/3 kHz) | Result |
|----------|--------------------|---------------------------------------|----------------------|--------|
| B Mode   |                    |                                       |                      |        |
| Low      | 2412               | -18.03                                | 8                    | PASS   |
| Mid      | 2437               | -17.97                                | 8                    | PASS   |
| High     | 2462               | -17.76                                | 8                    | PASS   |
| BLE Mode |                    |                                       |                      |        |
| Low      | 2402               | -24.76                                | 8                    | PASS   |
| Mid      | 2440               | -25.04                                | 8                    | PASS   |
| High     | 2480               | -25.22                                | 8                    | PASS   |

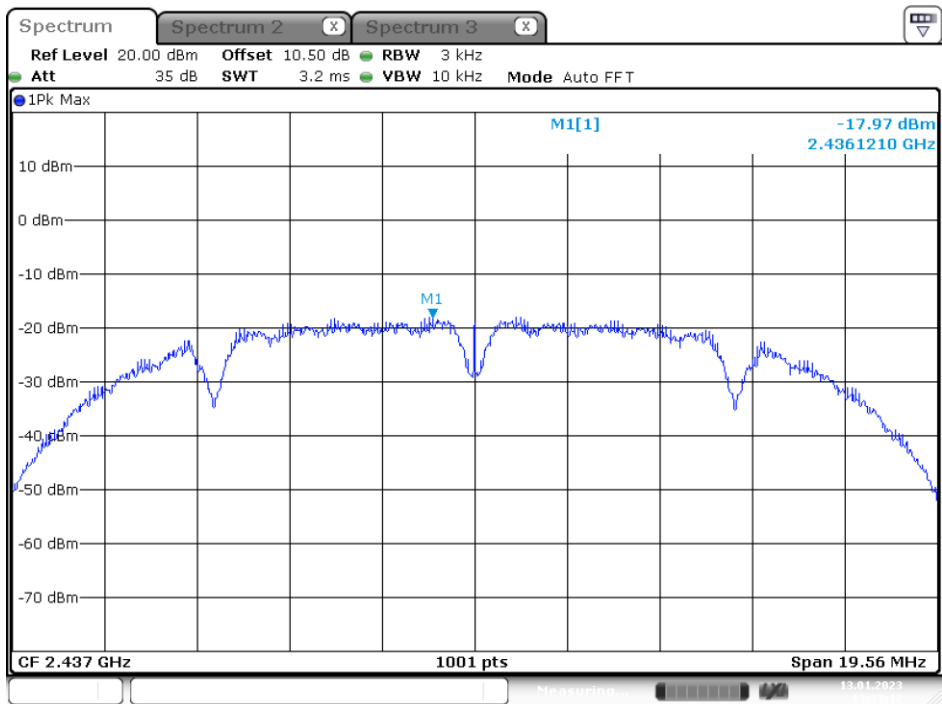
Please refer to the following plots

B Mode  
Low Channel



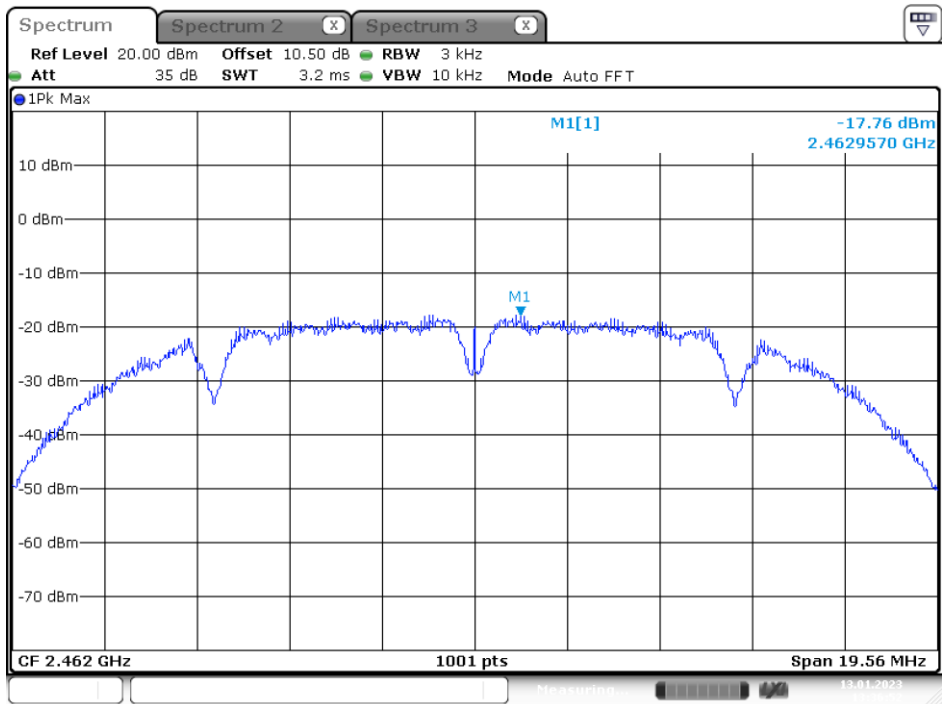
Date: 13.JAN.2023 13:28:28

Middle Channel



Date: 13.JAN.2023 13:33:12

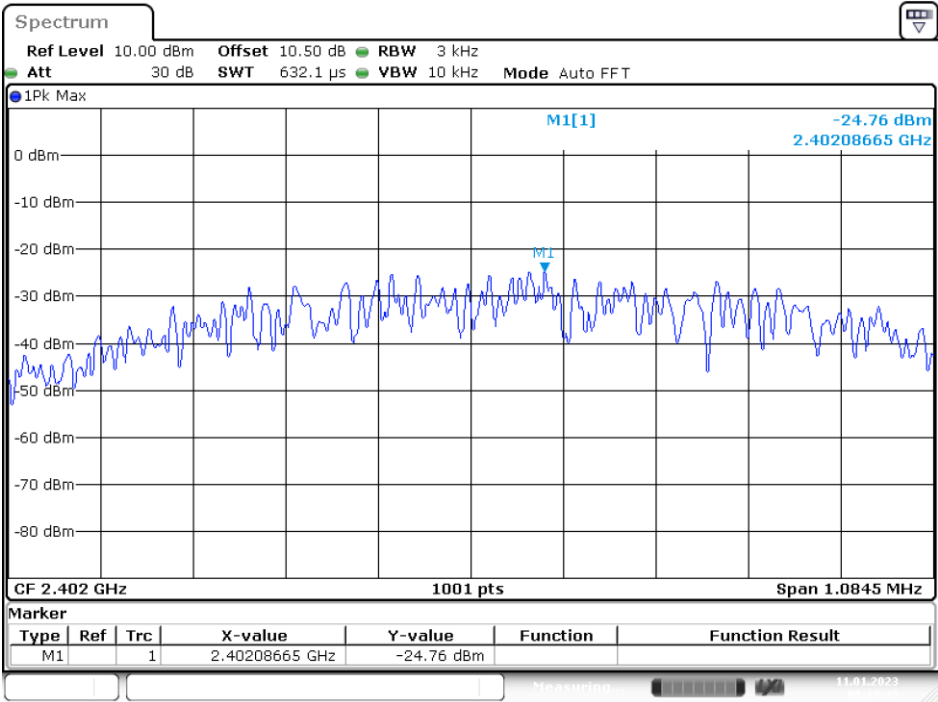
High Channel



Date: 13.JAN.2023 13:36:53

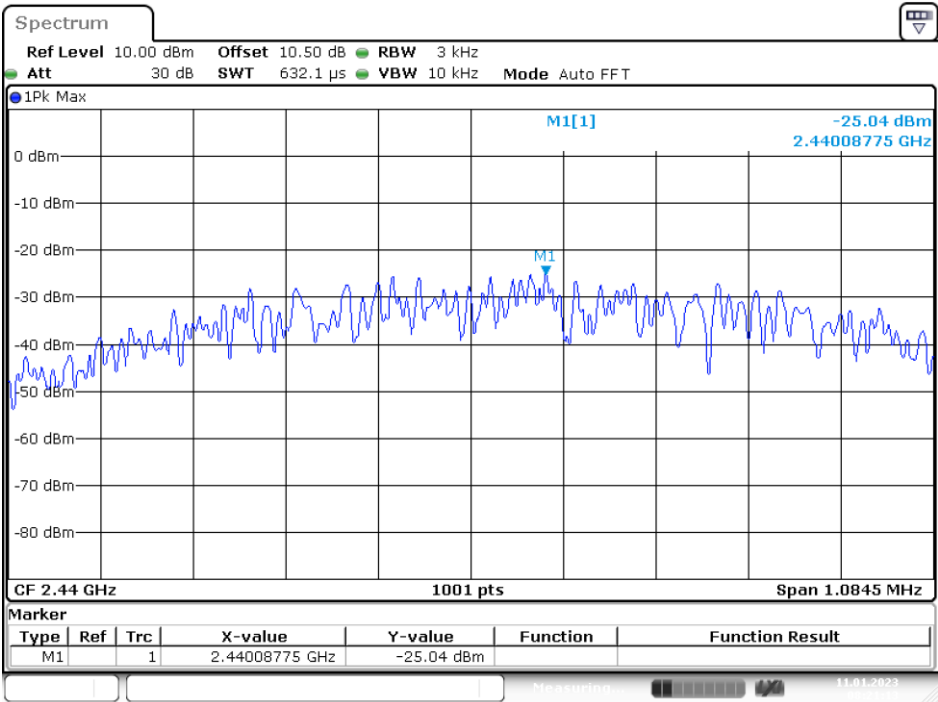


BLE Mode  
Low Channel



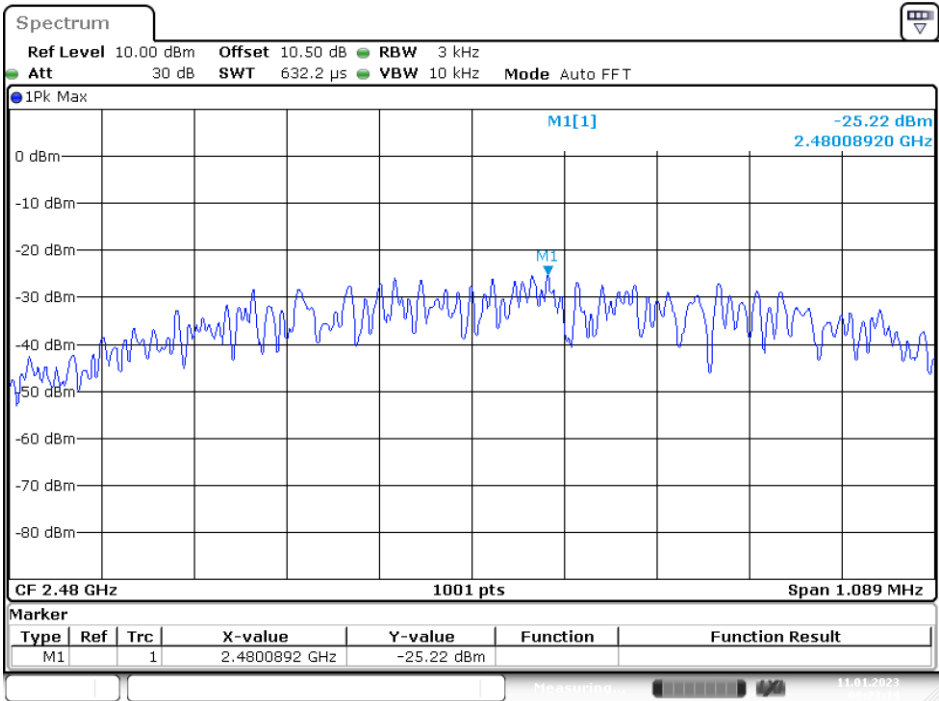
Date: 11.JAN.2023 08:19:36

Middle Channel



Date: 11.JAN.2023 08:21:13

High Channel



Date: 11.JAN.2023 08:23:14

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