

FCC / ISED & Test Report

FOR: Garmin International, Inc.

> Model Name: GMN-02245

Product Description: LTE/Wi-Fi Datalink and Data Storage System

> FCC ID: IPH-03788 IC: 1792A-03788

Applied Rules and Standards:

47 CFR Parts 27 RSS-139 Issue 4, RSS-199 Issue 4.

REPORT #: EMC_GARMI_116_23001_FCC_27_Rev1

DATE: 2023-09-19



A2LA Accredited

IC recognized # 3462B

CETECOM Inc. 411 Dixon Landing Road • Milpitas, CA 95035 • U.S.A. Phone: + 1 (408) 586 6200 • Fax: + 1 (408) 586 6299 • E-mail: info@cetecom.com • <u>http://www.cetecom.com</u> CETECOM Inc. is a Delaware Corporation with Corporation number: 2905571

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1 <u>Assessment</u>

The following device as further described in section 3 of this report was evaluated against the applicable criteria specified in the Code of Federal Regulations Title 47 parts 27 and Industry Canada Standards RSS-139 issue 4 and RSS-199 issue 4.

No deficiencies were ascertained.

| Company | Description | Model # |
|----------------------------|--|-----------|
| Garmin International, Inc. | LTE/Wi-Fi Datalink and Data Storage System | GMN-02245 |

Responsible for Testing Laboratory:

| | Arndt Stoecker | | |
|------------|----------------|-----------------------------------|------------|
| 2023-09-19 | Compliance | (Director of Regulatory Services) | |
| Date | Section | Name | Signature |
| Duto | oconom | Numo | orginataro |

Responsible for the Report:

| A | rt Thammanavarat | |
|----------------|--------------------|----------------------------------|
| Compliance (Se | nior EMC Engineer) | |
| Section | Name | Signature |
| | Compliance (Se | Compliance (Senior EMC Engineer) |

The test results of this test report relate exclusively to the test item specified in Section3.

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



2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the EMC Test Report

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

2.2 Identification of the Client

| Client Firm/Name: | Garmin International |
|-------------------|----------------------|
| Street Address: | 1200 East 151 Street |
| City/Zip Code | Olathe, KS 66062 |
| Country | USA |

2.3 Identification of the Manufacturer

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



3 Equipment Under Test (EUT)

3.1 EUT Specifications

| Model No | GMN-02245 |
|---|--|
| Marketing Name | GDL 60 |
| HW Version | Ver B |
| SW Version | 2.30 |
| FCC-ID | IPH-03788 |
| IC: | 1792A-03788 |
| FVIN: | 08 |
| HVIN: | GMN-02245 |
| PMN: | GDL 60 |
| Product Description | LTE/Wi-Fi Datalink and Data Storage System |
| Transceiver Technology / Type(s) of Modulation | Cellular Modules Model Name : Quectel Model Number : EG25-G FCC_: XMR201903EG25G ISED : 10224A-201903EG25G Wireless Technologies W-CDMA (UMTS) FDD: 4 LTE FDD Band: 4,7 LTE TDD Band: 41 |
| Frequency Range | UMTS Band IV: 1712.4 – 1752.6 MHz LTE Band 4: 1710 – 1755 MHz LTE Band 7: 2500 – 2570 MHz LTE Band 41: 2496 – 2690 MHz |
| Max. declared antenna gain | Name: Garmin Model: GA-61A P/N : 011-06391-00 Type: LTE/Wi-Fi Antenna Location: External Maximum Peak Gain in band: LTE Band 4 / UMTS Band IV: 1.67 dBi LTE Band 7: 5.47 dBi LTE Band 41: 5.47 dBi |
| Other Radios included in the device: | Wi-Fi |
| Power Supply/ Rated Operating Voltage Range | Vmin: 9 VDC/ Vnom: 24 VDC / Vmax: 32 VDC |

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| Operating Temperature Range | -40°C to 70 °C |
|--------------------------------|------------------------------|
| Sample Revision | □Production ■ Pre-Production |
| EUT Dimensions (cm) | 22.15cm x 10.16cm x 2.83cm |
| Weight (g) | 680g |
| EUT Diameter | ⊠ < 60 cm □ Other |

3.2 EUT Sample details

| EUT # | Serial Number | HW Version | SW Version | Notes/Comments |
|-------|---------------|------------|------------|--------------------|
| 1 | 67H001401 | Ver B | 2.30 | Radiated Emissions |

3.3 Accessory Equipment (AE) details

| EUT # | Model Number | Туре | Manufacturer | Serial Number |
|-------|--------------|-------------------|----------------------|---------------|
| 1 | GA-61A | LTE/Wi-Fi Antenna | Garmin International | 8AP000104 |

3.4 Test Sample Configuration

| Set-up # | EUT / AE used for set-up | Comments |
|----------|--------------------------|--|
| | | Cellular was tested on Mid Channels at maximum power in a co- transmission mode |
| 1 | EUT#1+AE#1 | WiFi radio was configured to 802.11g Mid channel using special commands through command window provided by the client that will not be available to the end user |

3.1 Justification for Worst Case Mode of Operation

| Mode of Operation | Description of Operating modes | Additional Information |
|----------------------|---|--|
| Op. 1 | Cellular and WiFi 802.11g Co-Transmission | During the testing process, the EUT was tested with transmitter sets on WiFi WLAN 802.11g mid channels with antenna GA 61A, and co- transmitting with LTE radio Mid Channel. The EUT was configured to the highest duty cycle and maximum output power. For radiated measurements, all data in this report shows the worst case between horizontal and vertical antenna polarizations and for all orientations of the EUT. |



4 <u>Subject of Investigation</u>

The objective of the measurements done by CETECOM Inc. was to evaluate the compliance of the EUT against the relevant requirements specified in the Code of Federal Regulations Title 47 parts 27 and ISED Standards and RSS-139 issue 4 and RSS-199 Issue 4.

4.1 Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the apparatus, with 95% confidence interval (in dB delta to result), based on a coverage factor k=2.

Radiated measurement

| Measurement Syst | em | EMC 1 | EMC 2 |
|----------------------------------|-----------------|---------|---------|
| Conducted emissions (mains port) | | 1.12 dB | 0.46 dB |
| Radiated emissions | (< 30 MHz) | 3.66 dB | 3.88 dB |
| | (30 MHz – 1GHz) | 3.17 dB | 3.34 dB |
| | (1 GHz – 3 GHz) | 5.01 dB | 4.45 dB |
| | (>3 GHz) | 4.0 dB | 4.79 dB |

RF conducted measurement ±0.5 dB

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

4.2 Environmental Conditions During Testing:

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

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

4.3 Dates of Testing:

2023-03-24 - 2023-05-30

4.4 Decision Rule:

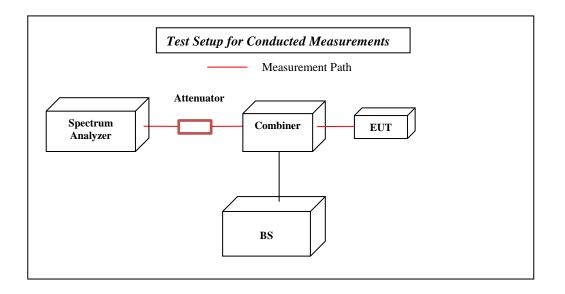
Cetecom advanced follows ILAC G8:2019 chapter 4.2.1 (Simple Acceptance Rule).

Only the measured values related to their corresponding limits will be used to decide whether the equipment under test meets the requirements of the test standards listed in chapter 3. The measurement uncertainty is mentioned in this test report, See chapter 9, but is not taken into account – neither to the limits nor to the measurement results. Measurement results with a smaller margin to the corresponding limits than the measurement uncertainty have a potential risk of more than 5% that the decision might be wrong.



5 <u>Measurement Procedures</u>

Testing is performed according to the guidelines provided in FCC publication (KDB) 971168 D01 v03r01 – "Measurement Guidance for Certification of Licensed Digital Transmitters" and according to relevant parts of ANSI/TIA-603-D-2010 as detailed below.

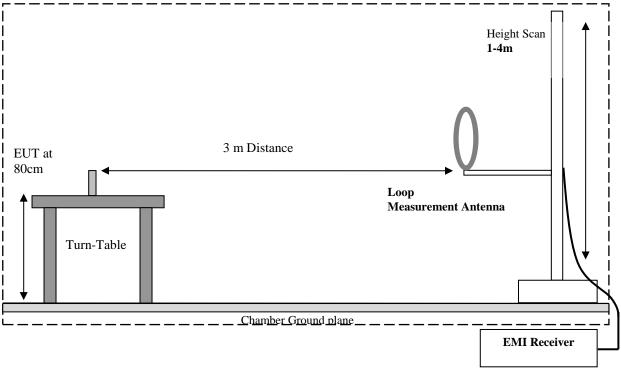


5.1 Radiated Measurement

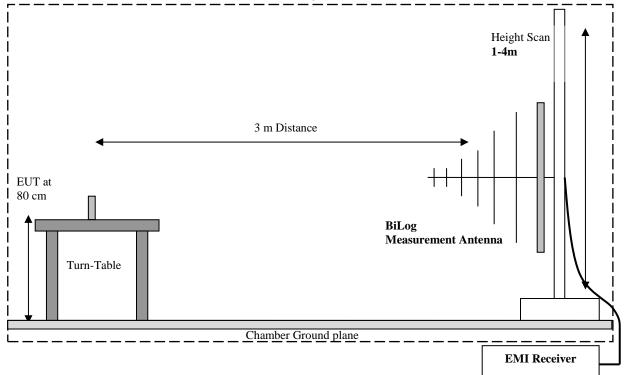
- The exploratory measurement is accomplished by running a matrix of 16 sweeps over the required frequency range with R&S Test-SW EMC32 for 4 positions of the turntable, two orthogonal positions of the EUT and both antenna polarizations. This procedure exceeds the requirement of the above standards to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



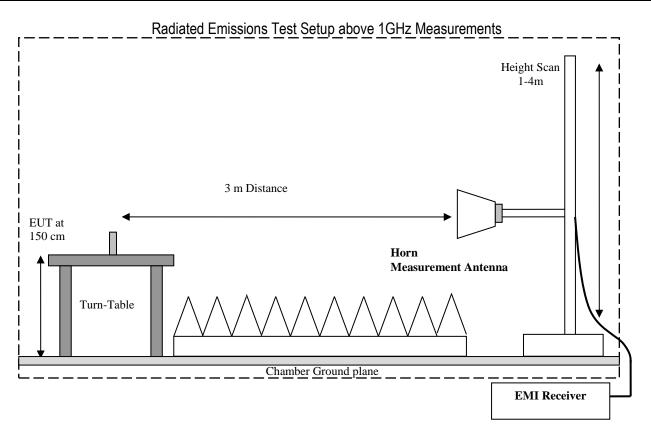
Radiated Emissions Test Setup below 30MHz Measurements



Radiated Emissions Test Setup 30MHz-1GHz Measurements







5.2 Sample Calculations for Field Strength Measurements

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

- Measured reading in dBµV
- Cable Loss between the receiving antenna and SA in dB and
- Antenna Factor in dB/m

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

FS (dB μ V/m) = Measured Value on SA (dB μ V)+ Cable Loss (dB)+ Antenna Factor (dB/m)

Example:

| Frequency | Measured SA | Cable Loss | Antenna Factor Correction | Field Strength Result |
|-----------|-------------|------------|---------------------------|-----------------------|
| (MHz) | (dBµV) | (dB) | (dB) | (dBµV/m) |
| 1000 | 80.5 | 3.5 | 14 | |

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6 <u>Measurement Results Summary</u>

6.1 FCC 27 / RSS-139, RSS-199

| Test Specification | Test Case | Temperature and Voltage Conditions | Mode | Pass | Fail | NA | NP | Result |
|--------------------|---------------------------------|---------------------------------------|-------|------|------|----|----|------------|
| §2.1046; §27.50 | RF Output Power | Nominal | - | | | | | See Note 3 |
| §2.1055; §27.54 | Frequency Stability | Extreme Temperature and Voltage | - | | | | | See Note 4 |
| §2.1049; §27.53 | Occupied Bandwidth | Nominal | - | | | | | See Note 5 |
| §2.1051; §27.53 | Band Edge Compliance | Nominal | - | | | | | See Note 6 |
| §2.1051; §27.53 | Conducted Spurious Emissions | Nominal | - | | | | | Note 2 |
| §2.1053; §27.53 | Radiated Spurious Emissions | Nominal | Op. 1 | | | | | Complies |

Note 1: NA= Not Applicable; NP= Not Performed.

Note 2: This device does not connect to AC mains network

Note 3: Leveraged from report # HR/2019/1001601, Section 4.1 (FCC ID: XMR201903EG25G, IC ID: 10224A-201903EG25G)

Note 4: Leveraged from report # HR/2019/1001601, Section 4.8 (FCC ID: XMR201903EG25G, IC ID: 10224A-201903EG25G)

Note 5: Leveraged from report # HR/2019/1001601, Section 4.3 (FCC ID: XMR201903EG25G, IC ID: 10224A-201903EG25G)

Note 6: Leveraged from report # HR/2019/1001601, Section 4.4 (FCC ID: XMR201903EG25G, IC ID: 10224A-201903EG25G)



7 <u>Test Result Data</u>

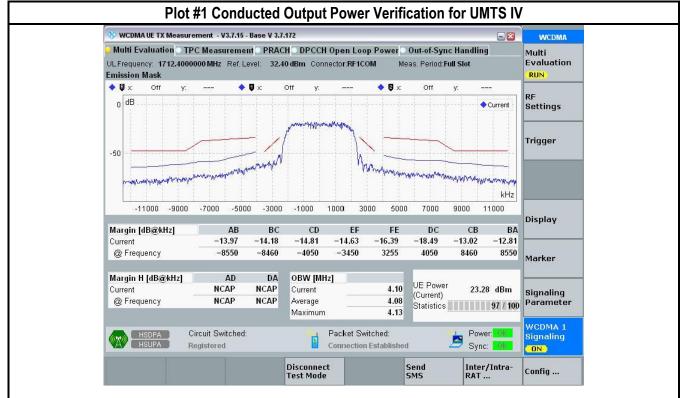
7.1 Output Power Verification

7.1.1 Conducted Output Power Measurement results.

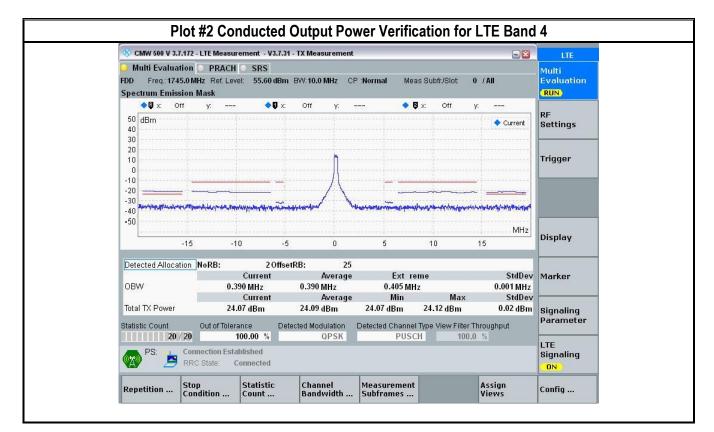
| Plot # | FCC Rule Parts | Band | Frequency Range (MHz) | Measure Output Power (dBm) | Measure Output Power (W) | Gain (dBi) | EIRP (W) Note 2 | Limit EIRP (W) |
|--------|-------------------|---------|--------------------------|-------------------------------|--------------------------------|---------------|--------------------|----------------------|
| 1 | 27 | UMTS IV | 1712.4 – 1752.6 | 23.28 | 0.213 | 1.67 | 0.313 | 1 |
| 2 | 27 | LTE 4 | 1710 – 1755 | 24.07 | 0.255 | 1.67 | 0.375 | 1 |
| 3 | 27 | LTE 7 | 2500 – 2570 | 23.28 | 0.213 | 5.47 | 0.750 | 1 |
| 4 | 27 | LTE 41 | 2496 – 2690 | 23.35 | 0.216 | 5.47 | 0.762 | 1 |

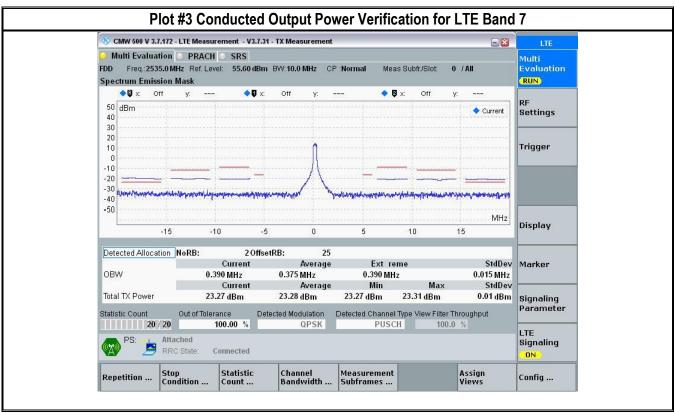
Note: ERP/EIRP are based on calculations from Power Conducted by adding the declared maximum gain of the utilized cellular antenna per operational description.

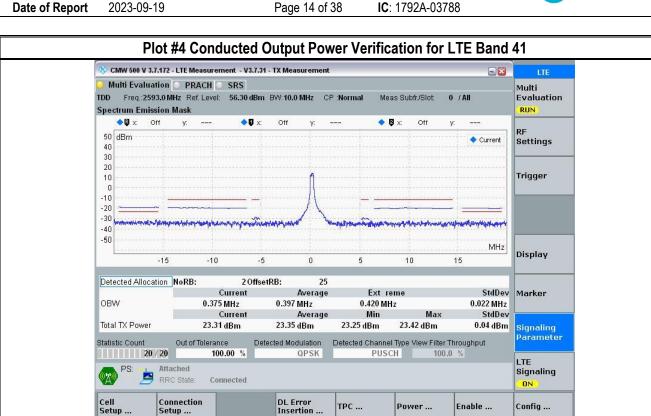
7.1.2 Measurement Plots:













7.2 Radiated Spurious Emissions

7.2.1 Measurement utilizing KDB 971168 D01 Power Meas License Digital Systems v03r01, and according to ANSI/TIA-603-D-2010

Spectrum Analyzer Settings for FCC 22

| Frequency Range | 30MHz – 1 GHz | 1 – 1.58 GHz | 1.58 – 9 GHz |
|-----------------------------|---------------|--------------|--------------|
| Resolution Bandwidth | 100 kHz | 1 MHz | 1 MHz |
| Video Bandwidth | 100 kHz | 1 MHz | 1 MHz |
| Detector | Peak | Peak | Peak |
| Trace Mode | Max Hold | Max Hold | Max Hold |
| Sweep Time | Auto | Auto | Auto |

Spectrum Analyzer Settings for FCC 24 and 27

| Frequency Range | 30MHz – 1 GHz | 1 – 2.7 GHz | 2.7 – 18 GHz | 18 – 19.1 GHz |
|----------------------|---------------|-------------|--------------|---------------|
| Resolution Bandwidth | 100 kHz | 1 MHz | 1 MHz | 1 MHz |
| Video Bandwidth | 100 kHz | 1 MHz | 1 MHz | 1 MHz |
| Detector | Peak | Peak | Peak | Peak |
| Trace Mode | Max Hold | Max Hold | Max Hold | Max Hold |
| Sweep Time | Auto | Auto | Auto | Auto |

7.2.2 Limits:

7.2.2.1 FCC Part 22.917 (a); FCC Part 24.238 (a); FCC Part 27.53 (h)(m)

Out of band emissions. The power of any emission outside of the authorized operating frequency ranges must be attenuated below the transmitting power (P) by a factor of at least 43 + 10 log(P) dB.

For Band 7 & 41, the minimum permissible attenuation level of any spurious emission is at least 55 + log10 (P) [Watts]) on all frequencies more than X megahertz from the channel edge, where X is the greater of 6 megahertz or the actual emission bandwidth as defined in paragraph (m)(6) of this section.

7.2.2.2 RSS-132 Part 5.5; RSS-133 Part 6.5; RSS-139 Part 5.6; RSS-199 Part 5.6 Transmitter Unwanted Emissions

Mobile and base station equipment shall comply with the limits in (i) and (ii) below.

i.In the first 1.0 MHz band immediately outside and adjacent to each of the sub-bands specified in Section 5.1, the power of emissions per any 1% of the occupied bandwidth shall be attenuated (in dB) below the transmitter output power P (dBW) by at least 43 + 10 log10p (watts).

ii.After the first 1.0 MHz immediately outside and adjacent to each of the sub-bands, the power of emissions in any 100 kHz bandwidth shall be attenuated (in dB) below the transmitter output power P (dBW) by at least 43 + 10 log10 p (watts). If the measurement is performed using 1% of the occupied bandwidth, power integration over 100 kHz is required.

Note: The limit calculation result is a constant of -13 dBm. Note: For LTE Band 7 and 41, the limit calculation result is a constant of -25 dBm.



7.2.3 Test conditions and setup:

| Ambient Temperature (°C) | EUT Set-Up # | EUT operating mode | Power Input |
|--------------------------|--------------|--------------------|-------------|
| 23.8 | 1 | Op. 1 | 12 VDC |

7.2.4 Measurement result:

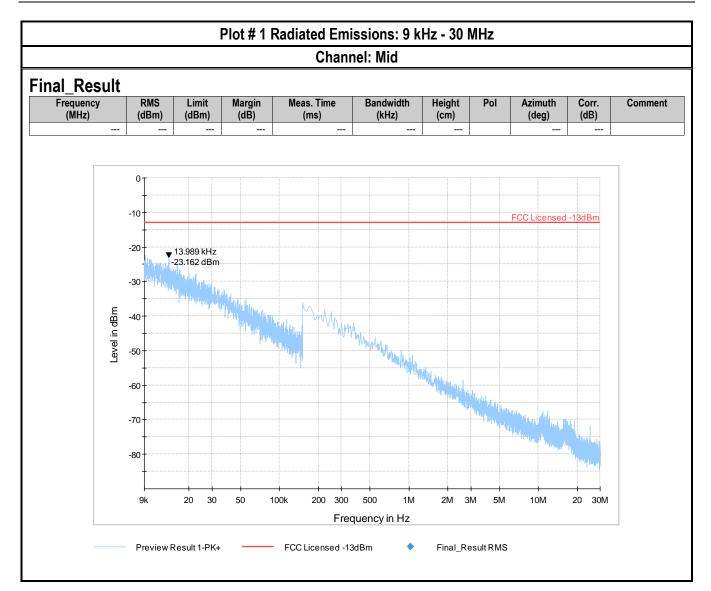
| Plot # | Channel | EUT operating mode | Scan Frequency | Limit (dBm) | Result |
|--------|---------|----------------------|----------------|-------------|--------|
| 1-5 | Mid* | UMTS Band IV + Wi-Fi | 9 kHz – 22 GHz | -13 | Pass |
| 6-10 | Mid* | LTE Band 4+ Wi-Fi | 9 kHz – 22 GHz | -13 | Pass |
| 11-15 | Mid* | LTE Band 7+ Wi-Fi | 9 kHz – 22 GHz | -25 | Pass |
| 16-20 | Mid* | LTE Band 41+ Wi-Fi | 9 kHz – 22 GHz | -25 | Pass |

*Note: Co-Transmission was performed with Wi-Fi 802.11g mode.



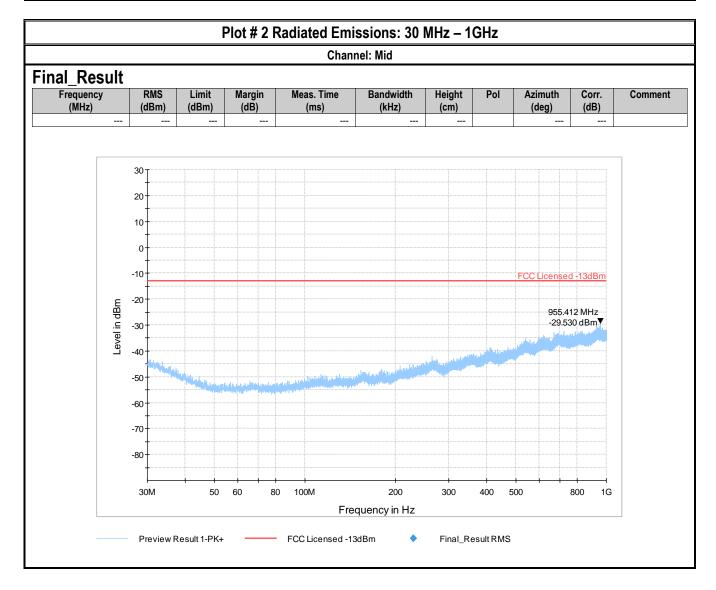
7.2.5 Measurement Plots:

UMTS Band IV

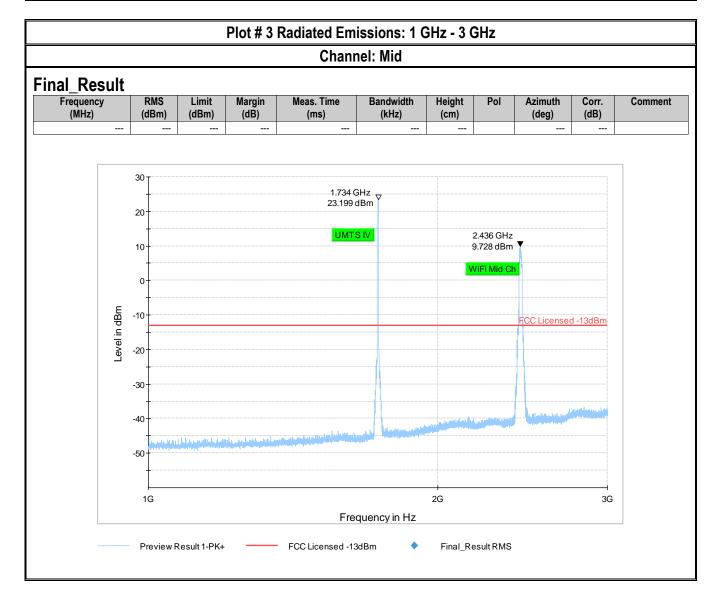


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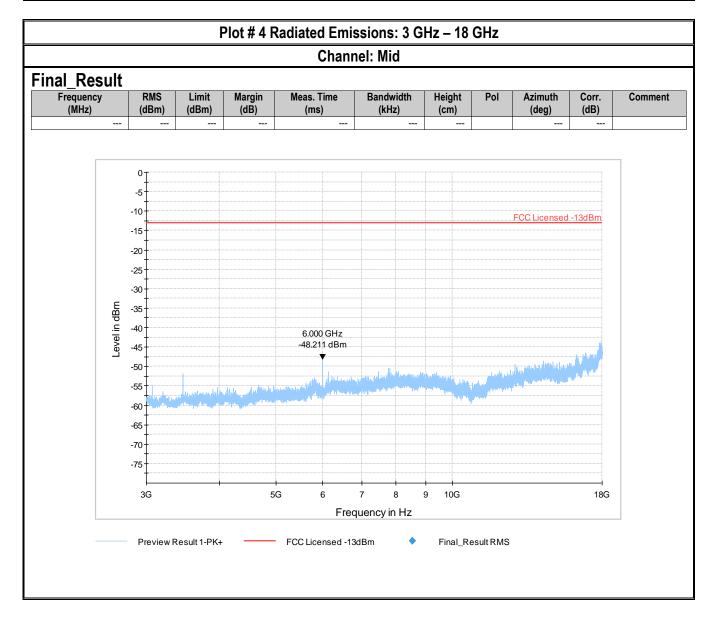






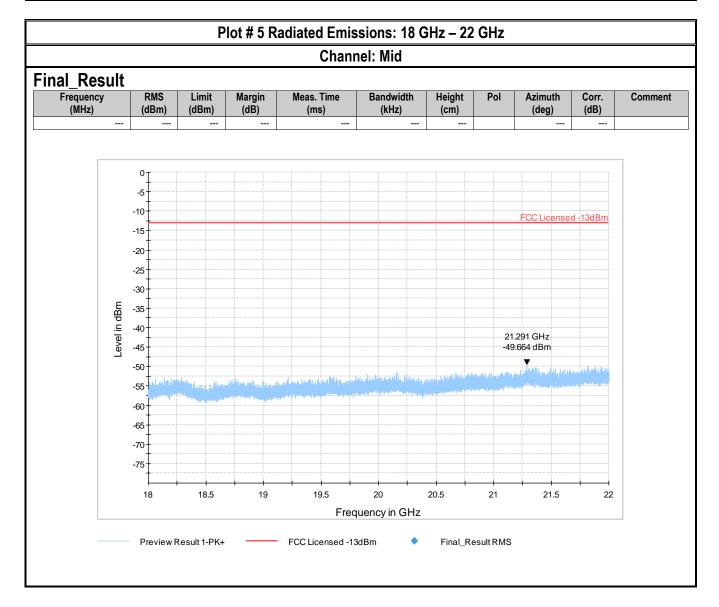
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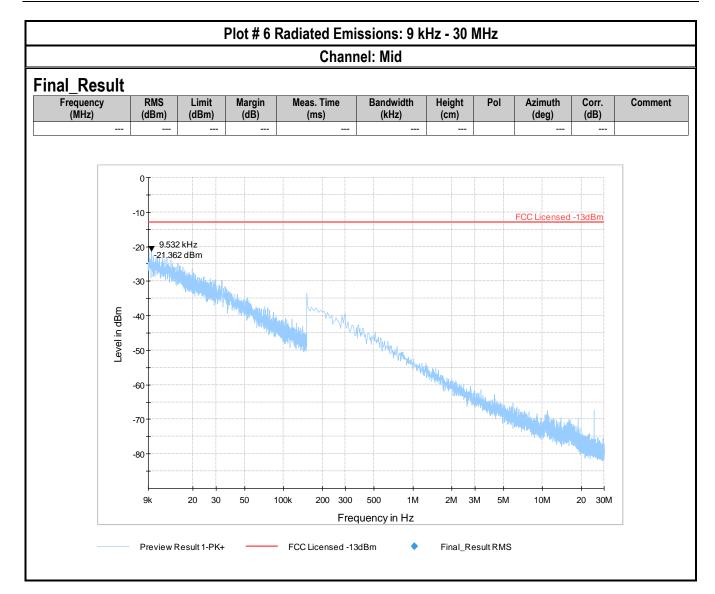




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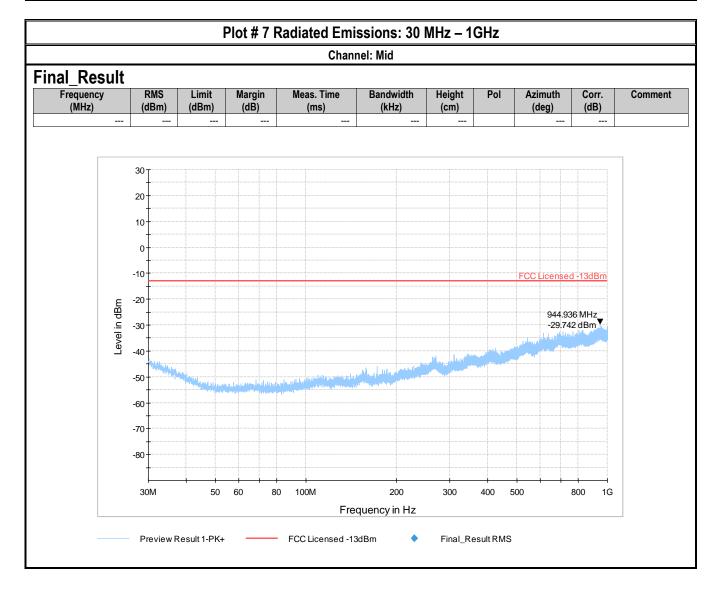


LTE Band 4

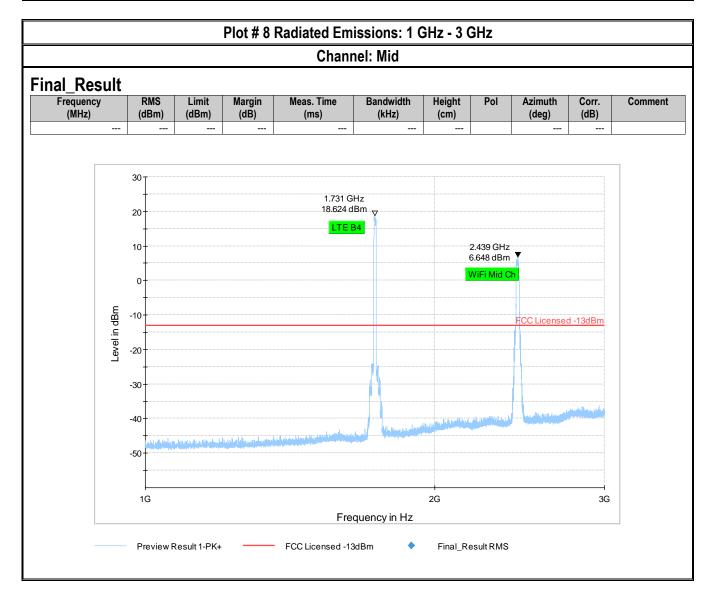


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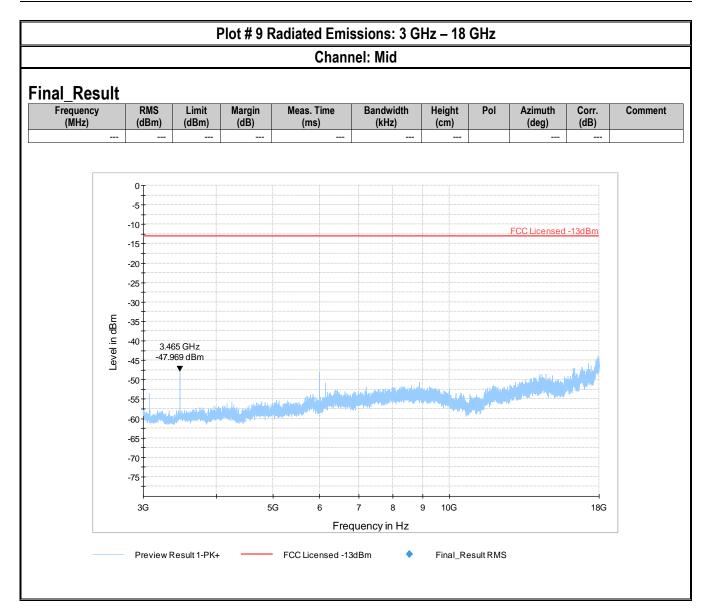








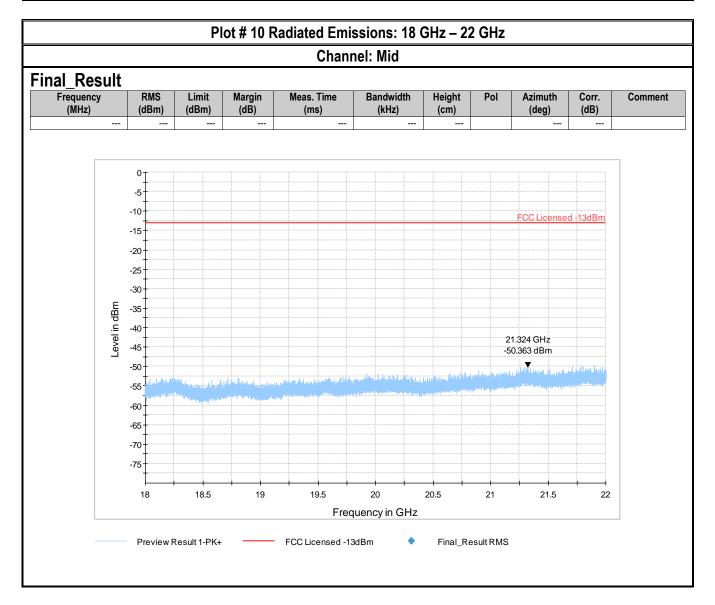




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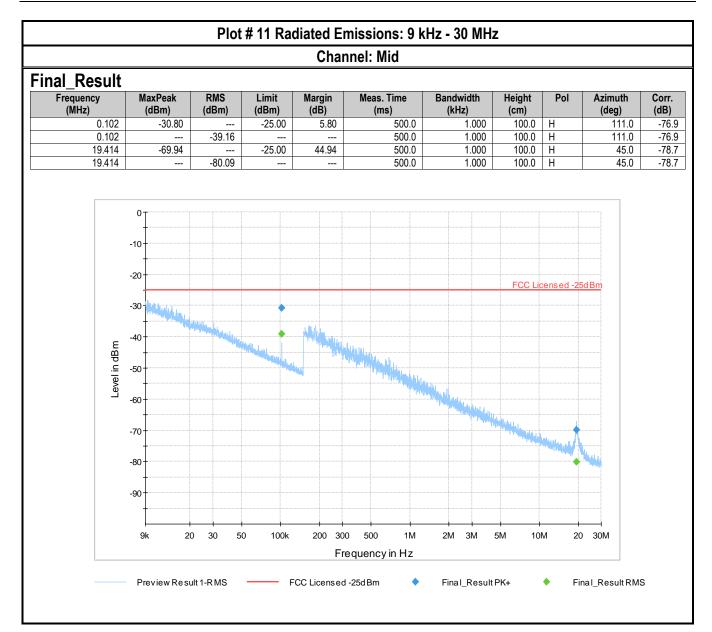


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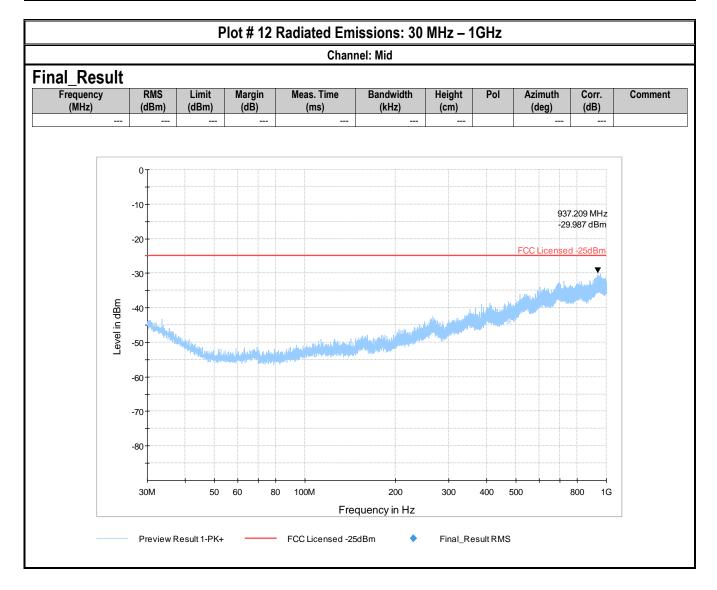




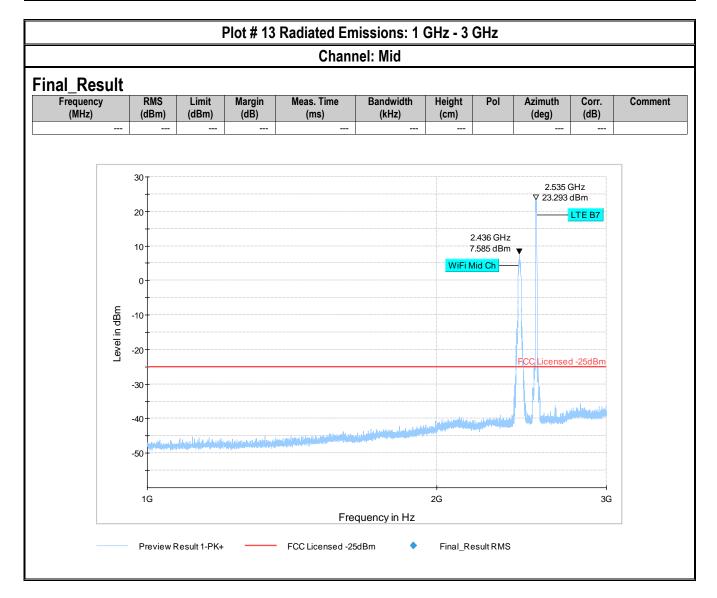
LTE Band 7



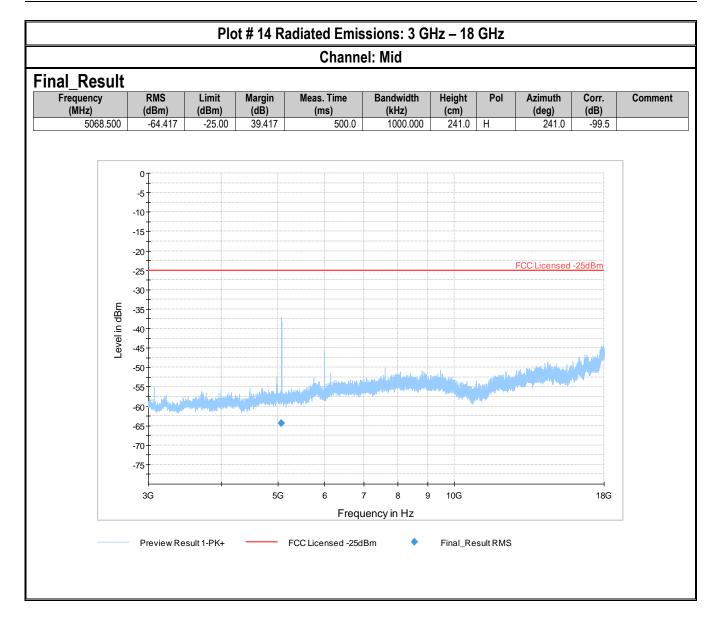






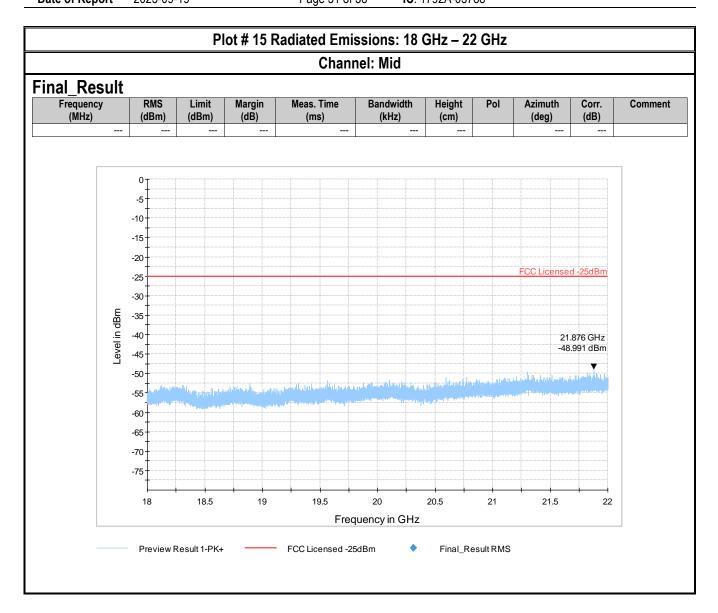






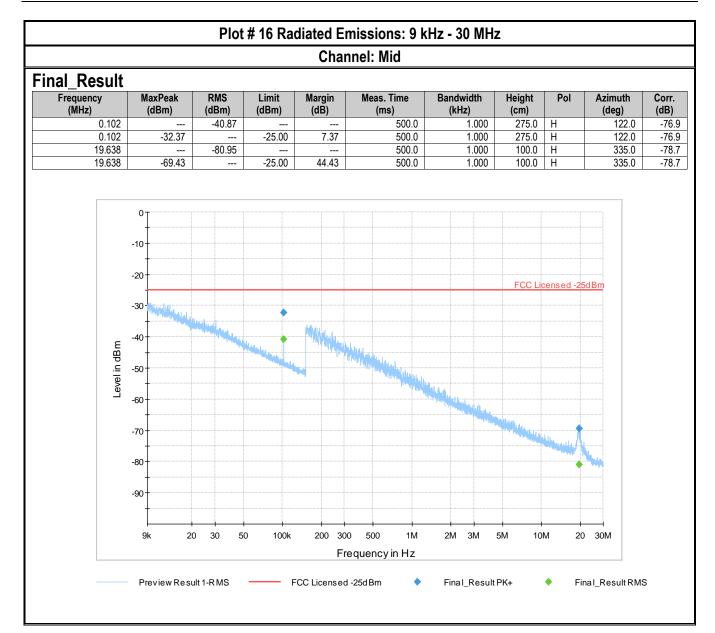
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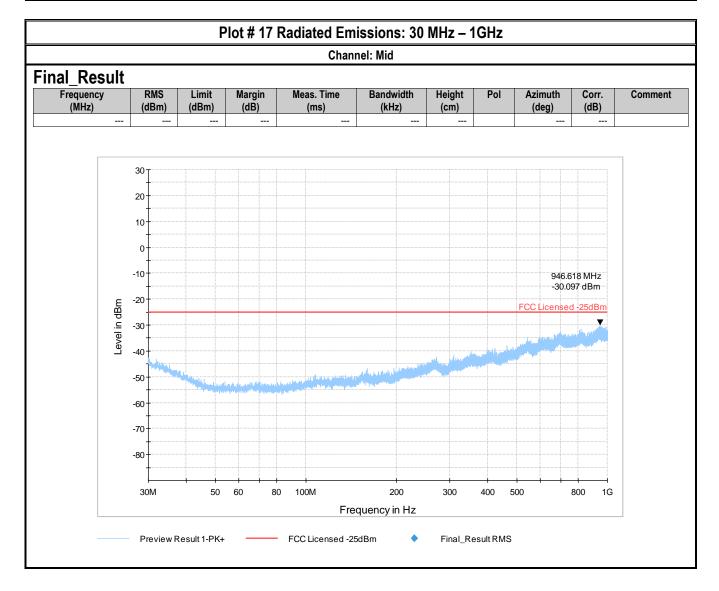




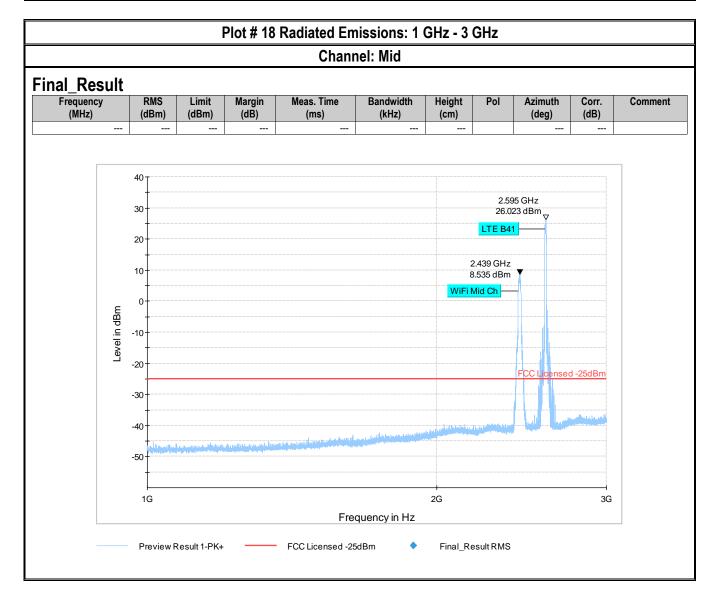
LTE Band 41





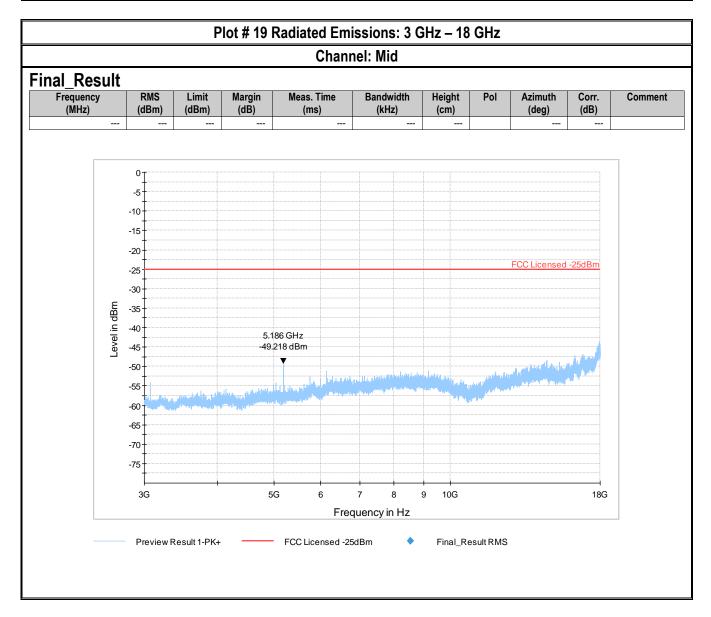






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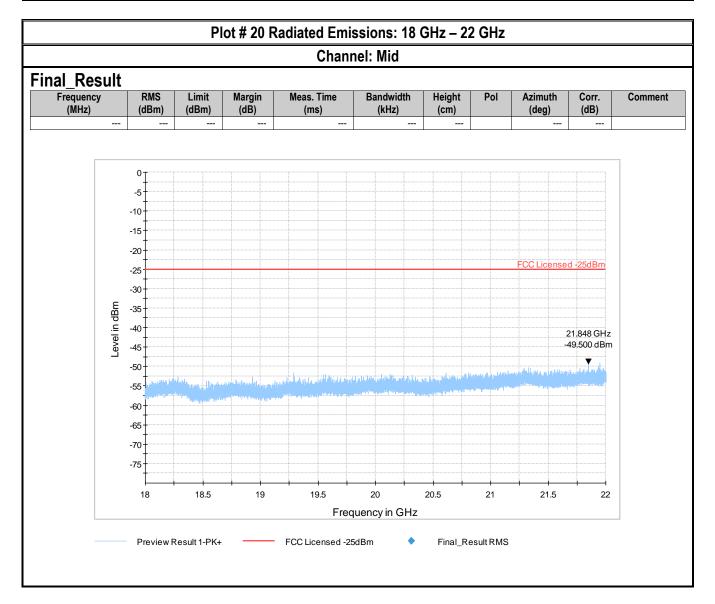




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8 Test setup photos

Setup photos are included in supporting file name: "EMC_GARMI_116_23001_FCC_27_Setup_photos.pdf"

Test Equipment and Ancillaries Used For Testing 9

| Equipment Type | Manufacturer | Model | Serial # | Calibration Cycle | Last Calibration Date |
|--|-----------------|-----------|---------------------------|-------------------|-----------------------|
| ACTIVE LOOP ANTENNA | ETS LINDGREN | 6507 | 00161344 | 3 YEARS | 10/30/2020 |
| BILOG ANTENNA | ETS.LINDGREN | 3142E | 00166067 | 3 YEARS | 10/21/2021 |
| HORN ANTENNA | EMCO | 3115 | 00035111 | 3 YEARS | 09/30/2021 |
| HORN ANTENNA | ETS.LINDGREN | 3117 | 00215984 | 3 YEARS | 01/31/2021 |
| HORN ANTENNA | ETS.LINDGREN | 3116 | 00070497 | 3 YEARS | 11/23/2020 |
| TEST RECEIVER | R&S | ESU40 | 100251 | 3 YEARS | 09/13/2021 |
| Wideband Radio Communication Tester | Rohde & Schwarz | CMW500 | 1201.002K50- 127068-mX | 3 Years | 5/22/2022 |
| DIGITAL THRMOMETER | CONTROL COMPANY | 36934-164 | 181230565 | 3 YEARS | 10/20/2021 |

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

| Test Report #: | EMC_GARMI_116 | _23001_FCC_27_Rev1 | FCC ID: IPH-03788 | C cetecom |
|----------------|---------------|--------------------|-------------------|-----------|
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10 Revision History

| Date | Template Revision | Changes to report | Prepared by |
|------------|----------------------------------|--|-------------------|
| 2023-09-13 | EMC_GARMI_116_23001_FCC_27 | Initial Version | Art Thammanavarat |
| 2023-09-19 | EMC_GARMI_116_23001_FCC_27_Rev.1 | Report Revised based on Reviewer's comments 1. Secs 1, 4, 6 and 7.2.2: Added RSS-199 Issue 4 2. Secs 4: Corrected Typo 3. Secs 7.2.2.2: Corrected Typo | Art Thammanavarat |
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