



中认信通
CHINA CERTIFICATION ICT CO., LTD (DONGGUAN)



TEST REPORT

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Product Name: NAVEE Electric Scooter

Standard(s): 47 CFR Part 15, Subpart C(15.247)
RSS-247 Issue 2, February 2017
RSS-Gen, Issue 5, February 2021 Amendment 2
ANSI C63.10-2013
KDB 558074 D01 15.247 Meas Guidance v05r02

The above equipment has been tested and found compliant with the requirement of the relative standards by China Certification ICT Co., Ltd (Dongguan)

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Test Facility

The Test site used by China Certification ICT Co., Ltd (Dongguan) to collect test data is located on the No. 113, Pingkang Road, Dalang Town, Dongguan, Guangdong, China.

The lab has been recognized as the FCC accredited lab under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No. : 442868, the FCC Designation No. : CN1314.

The lab has been recognized by Innovation, Science and Economic Development Canada to test to Canadian radio equipment requirements, the CAB identifier: CN0123.

Declarations

China Certification ICT Co., Ltd (Dongguan) is not responsible for the authenticity of any test data provided by the applicant. Data included from the applicant that may affect test results are marked with a triangle symbol “▲”. Customer model name, addresses, names, trademarks etc. are not considered data.

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
1.0	CR230206072-00A	Original Report	2023/3/22

1. GENERAL INFORMATION

1.1 Product Description for Equipment under Test (EUT)

EUT Name:	NAVEE Electric Scooter
EUT Model:	NKT2214-D32
Operation Frequency:	2402-2480MHz
Maximum Peak Output Power (Conducted):	2.09 dBm
Modulation Type:	GFSK
Rated Input Voltage:	DC 36.5V from battery or DC 42V from switching power supply
Serial Number:	214I-1
EUT Received Date:	2023/2/14
EUT Received Status:	Good

Operation Frequency Detail:

Channel	Frequency (MHz)	Channel	Frequency (MHz)
0	2402	20	2442
1	2404	21	2444
...	...	...	...
...	...	...	...
...	...	...	...
18	2438	38	2478
19	2440	39	2480

Per section 15.31(m) /RSS-Gen, the below frequencies were performed the test as below:

Test Channel	Frequency (MHz)
Lowest	2402
Middle	2440
Highest	2480

Antenna Information Detail▲:

Antenna Type	input impedance (Ohm)	Frequency Range	Antenna Gain
PCB	50	2.4~2.5GHz	0.2 dBi

The Method of §15.203 Compliance:

- ☒ Antenna must be permanently attached to the unit.
- ☐ Antenna must use a unique type of connector to attach to the EUT.
- ☐ Unit must be professionally installed, and installer shall be responsible for verifying that the correct antenna is employed with the unit.

Accessory Information:

Accessory Description	Manufacturer	Model
Adapter	Shenzhen Fuyuan Power Co., Ltd.	FY-4202000

1.2 Description of Test Configuration

1.2.1 EUT Operation Condition:

For BLE:

EUT Operation Mode:	The system was configured for testing in Engineering Mode, which was provided by the manufacturer.		
Equipment Modifications:	No		
EUT Exercise Software:	RTL8762x_RFTTestTool_v1.0.1.7.exe		
The software was provided by manufacturer. The maximum power was configured as below, that was provided by the manufacturer▲:			
Test Modes	Power Level Setting		
	Lowest Channel	Middle Channel	Highest Channel
BLE	default	default	default

1.2.2 Support Equipment List and Details

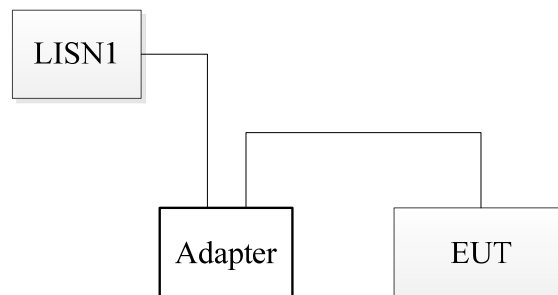
Manufacturer	Description	Model	Serial Number
/	/	/	/

1.2.3 Support Cable List and Details

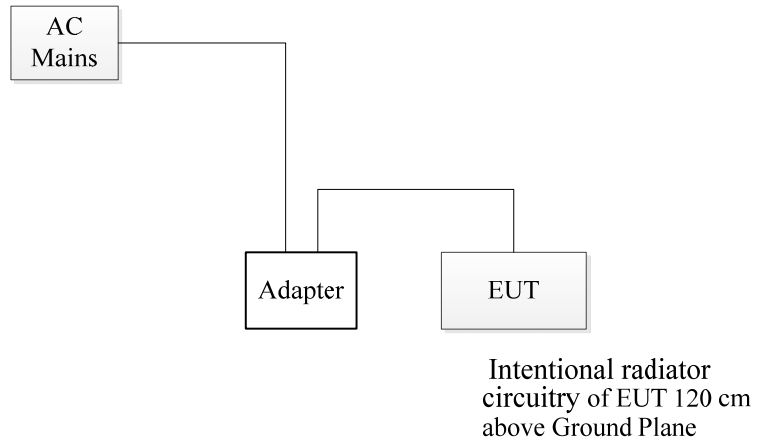
Cable Description	Shielding Type	Ferrite Core	Length (m)	From Port	To
Power Cable	No	No	1	LISN	Adapter
Power Cable	No	No	2	Adapter	EUT

1.2.4 Block Diagram of Test Setup

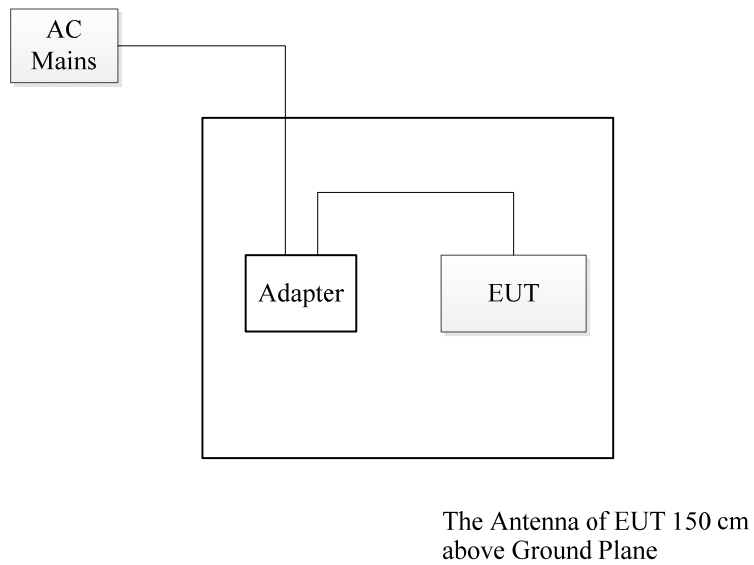
AC line conducted emissions:



Spurious Emissions:
Below 1GHz:



Above 1GHz:



1.3 Measurement Uncertainty

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

Parameter	Measurement Uncertainty
Occupied Channel Bandwidth	$\pm 5\%$
RF output power, conducted	$\pm 0.61\text{dB}$
Power Spectral Density, conducted	$\pm 0.61\text{ dB}$
Unwanted Emissions, radiated	30M~200MHz: 4.15 dB, 200M~1GHz: 5.61 dB, 1G~6GHz: 5.14 dB, 6G~18GHz: 5.93 dB, 18G~26.5G: 5.47 dB, 26.5G~40G: 5.63 dB
Unwanted Emissions, conducted	$\pm 1.26\text{ dB}$
Temperature	$\pm 1^{\circ}\text{C}$
Humidity	$\pm 5\%$
DC and low frequency voltages	$\pm 0.4\%$
Duty Cycle	1%
AC Power Lines Conducted Emission	2.8 dB (150 kHz to 30 MHz)

2. SUMMARY OF TEST RESULTS

Standard(s) Section	Test Items	Result
§15.207(a) RSS-Gen Clause 8.8	AC line conducted emissions	Compliant
§15.205, §15.209, §15.247(d) RSS-Gen Clause 8.10	Spurious Emissions	Compliant
§15.247 (a)(2) RSS-247 Clause 5.2 a)	6 dB Bandwidth	Compliant
RSS-Gen Clause 6.7	99% Occupied Bandwidth	Compliant
§15.247(b)(3) RSS-247 Clause 5.4 d)	Maximum Conducted Output Power	Compliant
§15.247(d) RSS-247 Clause 5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
§15.247(e) RSS-247 Clause 5.2 b)	Power Spectral Density	Compliant
§15.203 RSS-GEN Clause 6.8	Antenna Requirement	Compliant
§15.247 (i) & §1.1307	RF Exposure	Compliant
RSS-102 Clause 2.5.1	Exemption Limits For Routine Evaluation- SAR Evaluation	Compliant

3. REQUIREMENTS AND TEST PROCEDURES

3.1 AC Line Conducted Emissions

3.1.1 Applicable Standard

FCC§15.207(a).

(a) Except as shown in paragraphs (b) and (c) of this section, 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 μ 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 frequency ranges.

Frequency of emission (MHz)	Conducted limit (dB μ V)	
	Quasi-peak	Average
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

*Decreases with the logarithm of the frequency.

(b) The limit shown in paragraph (a) of this section shall not apply to carrier current systems operating as intentional radiators on frequencies below 30 MHz. In lieu thereof, these carrier current systems shall be subject to the following standards:

(1) For carrier current system containing their fundamental emission within the frequency band 535-1705 kHz and intended to be received using a standard AM broadcast receiver: no limit on conducted emissions.

(2) For all other carrier current systems: 1000 μ V within the frequency band 535-1705 kHz, as measured using a 50 μ H/50 ohms LISN.

(3) Carrier current systems operating below 30 MHz are also subject to the radiated emission limits in §15.205, §15.209, §15.221, §15.223, or §15.227, as appropriate.

(c) Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

RSS-Gen Clause 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 μ H / 50 Ω 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.

Table 4 – AC power-line conducted emissions limits

Frequency (MHz)	Conducted limit (dB μ V)	
	Quasi-peak	Average
0.15 - 0.5	66 to 56 ¹	56 to 46 ¹
0.5 – 5	56	46
5 – 30	60	50

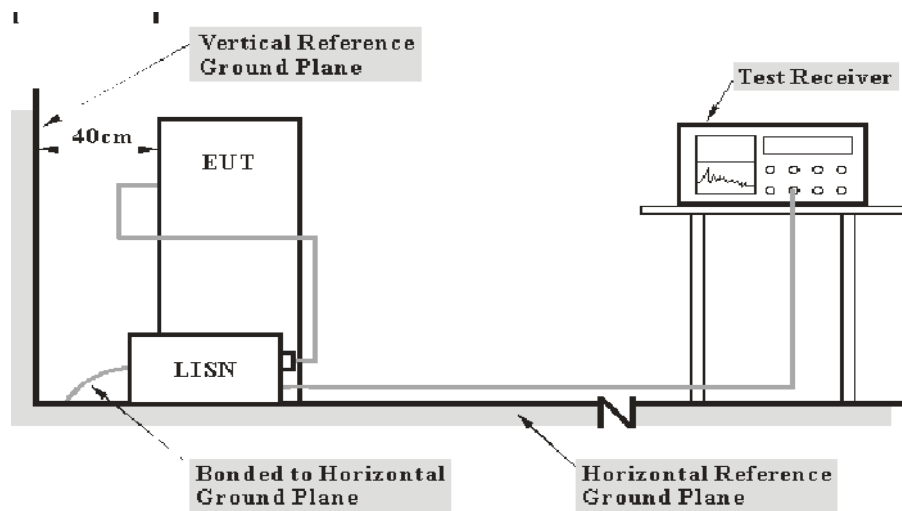
Note 1: The level decreases linearly with the logarithm of the frequency.

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

(a) Perform the AC power-line conducted emissions test with the antenna connected to determine compliance with the limits of table 4 outside the transmitter's fundamental emission band.

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

3.1.2 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,RSS-Gen limits.

The spacing between the peripherals was 10 cm.

The adapter or EUT was connected to the main LISN with a 120 V/60 Hz AC power source.

3.1.3 EMI Test Receiver Setup

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

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

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

3.1.4 Test Procedure

The frequency and amplitude of the six highest ac power-line conducted emissions relative to the limit, measured over all the current-carrying conductors of the EUT power cords, and the operating frequency or frequency to which the EUT is tuned (if appropriate), should be reported, unless such emissions are more than 20 dB below the limit. AC power-line conducted emissions measurements are to be separately carried out only on each of the phase (“hot”) line(s) and (if used) on the neutral line(s), but not on the ground [protective earth] line(s). If less than six emission frequencies are within 20 dB of the limit, then the noise level of the measuring instrument at representative frequencies should be reported. The specific conductor of the power-line cord for each of the reported emissions should be identified. Measure the six highest emissions with respect to the limit on each current-carrying conductor of each power cord associated with the EUT (but not the power cords of associated or peripheral equipment that are part of the test configuration). Then, report the six highest emissions with respect to the limit from among all the measurements identifying the frequency and specific current-carrying conductor identified with the emission. The six highest emissions should be reported for each of the current-carrying conductors, or the six highest emissions may be reported over all the current-carrying conductors.

3.1.5 Corrected Amplitude & Margin Calculation

The basic equation is as follows:

Result = Reading + Factor

Factor = attenuation caused by cable loss + voltage division factor of AMN

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. The equation for margin calculation is as follows:

Margin = Limit – Result

3.2 Radiation Spurious Emissions

3.2.1 Applicable Standard

FCC §15.247 (d);

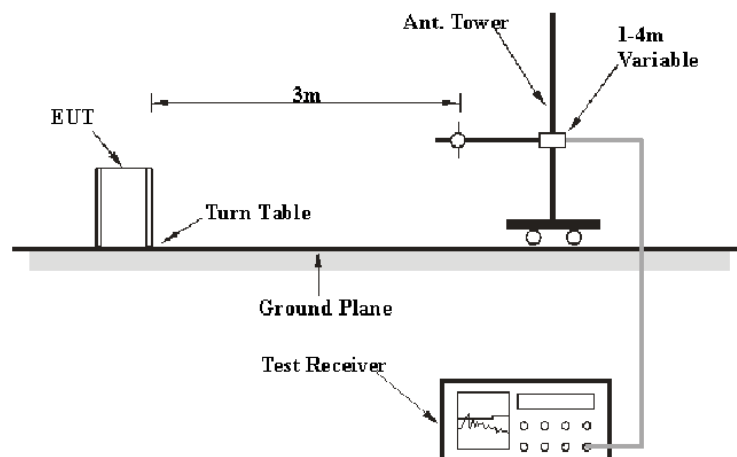
In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the 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)).

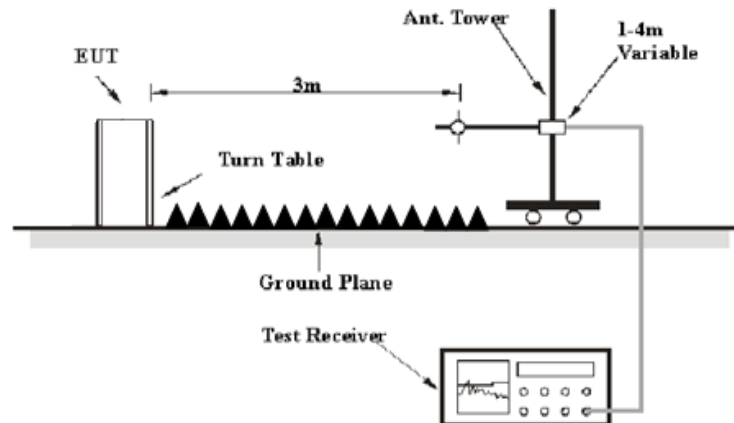
RSS-247 Clause 5.5

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

3.2.2 EUT Setup

Below 1GHz:



Above 1GHz:

The radiated emissions were performed in the 3 meters distance, using the setup accordance with the ANSI C63.10-2013. The specification used was the FCC 15.209, and FCC 15.247, RSS-247, RSS-Gen limits.

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

The spacing between the peripherals was 10 cm.

3.2.3 EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 25 GHz.

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

30-1000MHz:

Detector	RBW	Video B/W	IF B/W
QP	120 kHz	300 kHz	120kHz

1GHz- 25GHz:

Measurement	Duty cycle	RBW	Video B/W
PK	Any	1MHz	3 MHz
AV	>98%	1MHz	10 Hz
	<98%	1MHz	1/T

Note: T is minimum transmission duration

If the maximized peak measured value complies with under the QP/Average limit more than 6dB, then it is unnecessary to perform an QP/Average measurement.

3.2.4 Test Procedure

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

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

3.2.5 Corrected Amplitude & Margin Calculation

The basic equation is as follows:

$$\text{Result} = \text{Reading} + \text{Factor}$$

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

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. The equation for margin calculation is as follows:

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

3.3 6 dB Emission Bandwidth:

3.3.1 Applicable Standard

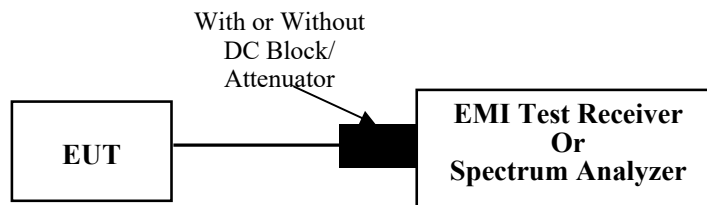
FCC §15.247 (a)(2)

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.

RSS-247 Clause 5.2 a

The minimum 6 dB bandwidth shall be 500 kHz.

3.3.2 EUT Setup



3.3.3 Test Procedure

According to ANSI C63.10-2013 Section 11.8

- Set RBW = 100 kHz.
- Set the video bandwidth (VBW) $\geq 3 \times \text{RBW}$.
- Detector = Peak.
- Trace mode = max hold.
- Sweep = auto couple.
- Allow the trace to stabilize.
- 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.

3.4 99% Occupied Bandwidth:

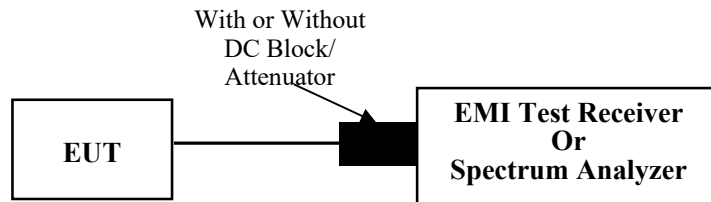
3.4.1 Applicable Standard

RSS-Gen Clause 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.

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

3.4.2 EUT Setup



3.4.3 Test Procedure

RSS-Gen Clause 6.7

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

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

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

For the 99% emission bandwidth, the trace data points are recovered and directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached, and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded. The difference between the two recorded frequencies is the occupied bandwidth (or the 99% emission bandwidth).

3.5 Maximum conducted output power:

3.5.1 Applicable Standard

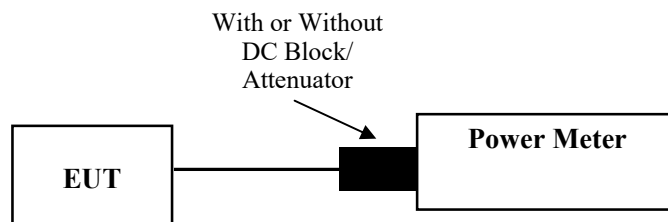
FCC §15.247 (b)(3)

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

RSS-247 Clause 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 1W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

3.5.2 EUT Setup



3.5.3 Test Procedure

According to ANSI C63.10-2013 Section 11.9.1.3

The maximum conducted output power may be measured using a broadband RF power meter. The power meter shall have a video bandwidth that is greater than or equal to the DTS bandwidth and shall use a fast-responding diode detector.

- Set the EUT in transmitting mode.
- Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to test equipment.
- Add a correction factor to the display.
- Set the power meter to test peak and/or Average output power, record the result.

3.6 Maximum power spectral density:

3.6.1 Applicable Standard

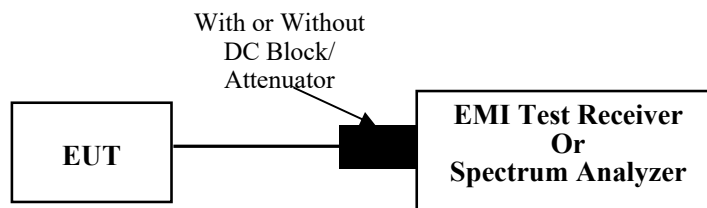
FCC §15.247 (e)

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.

RSS-247 Clause 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).

3.6.2 EUT Setup



3.6.3 Test Procedure

According to ANSI C63.10-2013 Section 11.10.2

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

3.7 100 kHz Bandwidth of Frequency Band Edge:

3.7.1 Applicable Standard

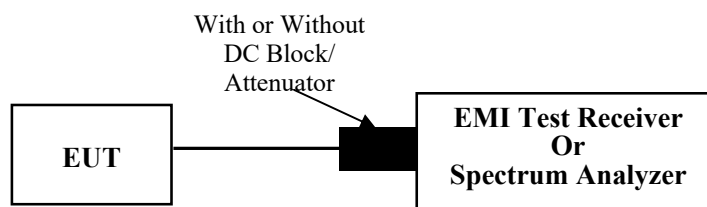
FCC §15.247 (d);

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)).

RSS-247 Clause 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

3.7.2 EUT Setup



3.7.3 Test Procedure

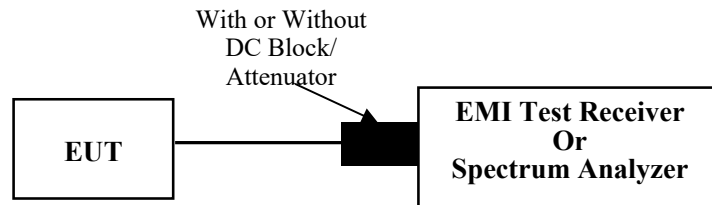
According to ANSI C63.10-2013 Section 11.11

- Set the center frequency and span to encompass frequency range to be measured.
- Set the RBW = 100 kHz.
- Set the VBW $\geq [3 \times \text{RBW}]$.
- Detector = peak.
- Sweep time = auto couple.
- Trace mode = max hold.
- Allow trace to fully stabilize.
- Use the peak marker function to determine the maximum amplitude level.

Ensure that the amplitude of all unwanted emissions outside of the authorized frequency band (excluding restricted frequency bands) is attenuated by at least the minimum requirements specified in 11.11. Report the three highest emissions relative to the limit.

3.8 Duty Cycle:

3.8.1 EUT Setup



3.8.2 Test Procedure

According to ANSI C63.10-2013 Section 11.6

The zero-span mode on a spectrum analyzer or EMI receiver if the response time and spacing between bins on the sweep are sufficient to permit accurate measurements of the ON and OFF times of the transmitted signal:

- 1) Set the center frequency of the instrument to the center frequency of the transmission.
- 2) Set $RBW \geq OBW$ if possible; otherwise, set RBW to the largest available value.
- 3) Set $VBW \geq RBW$. Set detector = peak or average.
- 4) The zero-span measurement method shall not be used unless both RBW and VBW are $> 50/T$ and the number of sweep points across duration T exceeds 100. (For example, if VBW and/or RBW are limited to 3 MHz, then the zero-span method of measuring the duty cycle shall not be used if $T \leq 16.7 \mu s$.)

3.9 Antenna Requirement

3.9.1 Applicable Standard

FCC §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 use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to carrier current devices or to devices operated under the provisions of §§15.211, 15.213, 15.217, 15.219, 15.221, or §15.236. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with §15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

RSS-GEN Clause 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 ISSED 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.

3.9.2 Judgment

Compliant. Please refer to the Antenna Information detail in Section 1.

4. Test DATA AND RESULTS

4.1 AC Line Conducted Emissions

Serial Number:	214I-1	Test Date:	2023/2/22
Test Site:	CE	Test Mode:	Transmitting(low channel was the worst)
Tester:	Bob Yang	Test Result:	Pass

Environmental Conditions:					
Temperature: (°C)	22.4	Relative Humidity: (%)	47	ATM Pressure: (kPa)	101.7

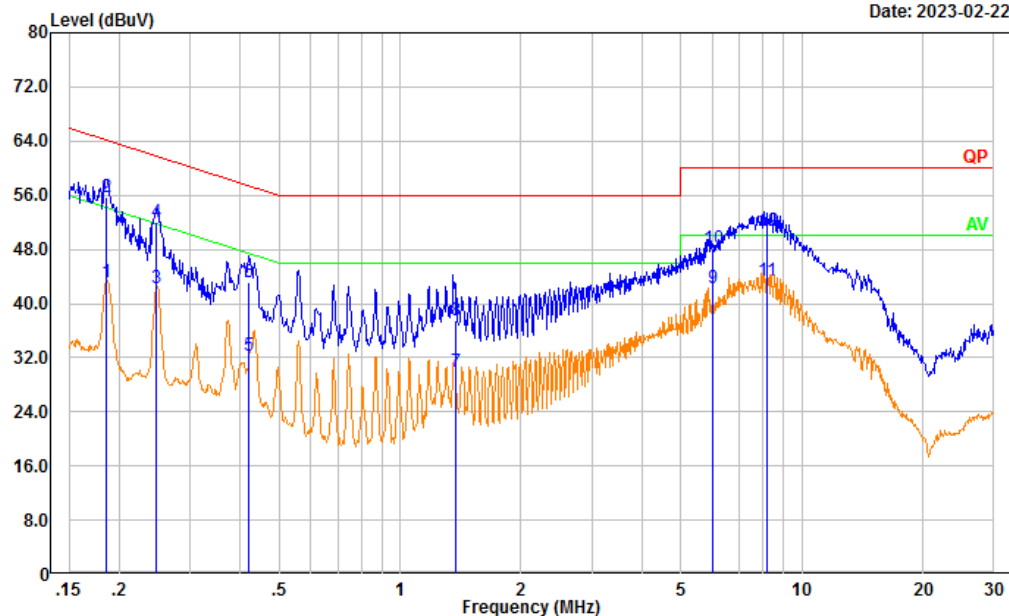
Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	LISN	ENV216	101134	2022/04/01	2023/03/31
R&S	EMI Test Receiver	ESR3	102726	2022/07/15	2023/07/14
MICRO-COAX	Coaxial Cable	UTIFLEX	C-0200-01	2022/08/07	2023/08/06
Audix	Test Software	E3	190306 (V9)	N/A	N/A

* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

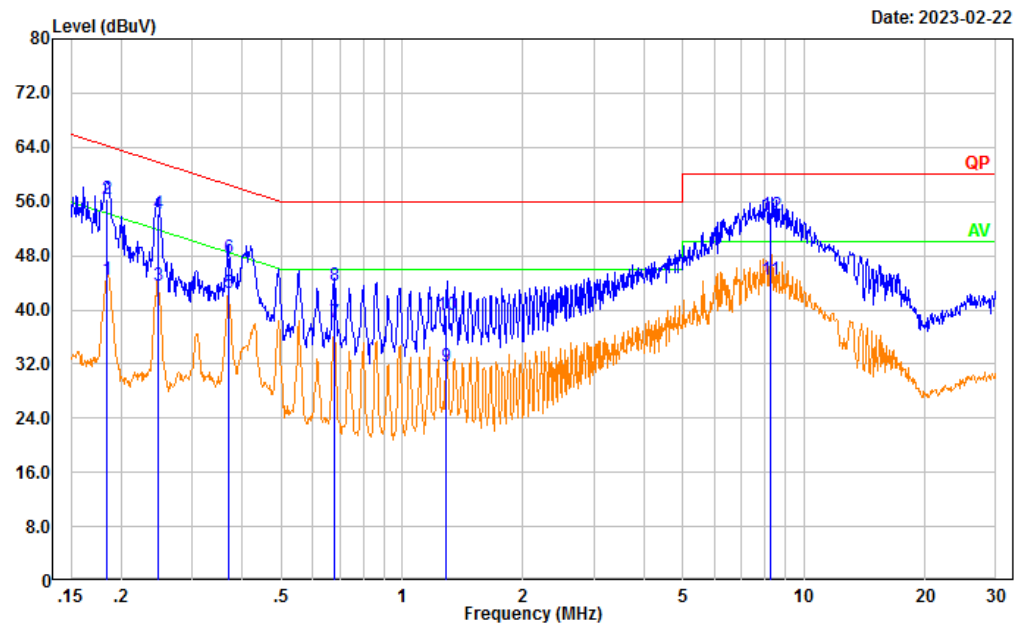
Test Mode: Transmitting
Port: Line
Note:

Date: 2023-02-22



No.	Frequency (MHz)	Reading (dBuV)	Factor (dB)	Result (dBuV)	Limit (dBuV)	Margin (dB)	Detector
1	0.186	33.44	9.61	43.05	54.19	11.14	Average
2	0.186	46.06	9.61	55.67	64.19	8.52	QP
3	0.247	32.57	9.61	42.18	51.86	9.68	Average
4	0.247	42.35	9.61	51.96	61.86	9.90	QP
5	0.421	22.63	9.61	32.24	47.43	15.19	Average
6	0.421	33.50	9.61	43.11	57.43	14.32	QP
7	1.374	20.40	9.62	30.02	46.00	15.98	Average
8	1.374	27.83	9.62	37.45	56.00	18.55	QP
9	5.989	32.72	9.66	42.38	50.00	7.62	Average
10	5.989	38.39	9.66	48.05	60.00	11.95	QP
11	8.186	33.75	9.67	43.42	50.00	6.58	Average
12	8.186	40.97	9.67	50.64	60.00	9.36	QP

Test Mode: Transmitting
Port: neutral
Note:



No.	Frequency (MHz)	Reading (dBμV)	Factor (dB)	Result (dBμV)	Limit (dBμV)	Margin (dB)	Detector
1	0.185	34.93	9.61	44.54	54.26	9.72	Average
2	0.185	46.67	9.61	56.28	64.26	7.98	QP
3	0.246	33.95	9.61	43.56	51.88	8.32	Average
4	0.246	44.60	9.61	54.21	61.88	7.67	QP
5	0.370	32.78	9.61	42.39	48.49	6.10	Average
6	0.370	38.19	9.61	47.80	58.49	10.69	QP
7	0.678	28.63	9.62	38.25	46.00	7.75	Average
8	0.678	34.00	9.62	43.62	56.00	12.38	QP
9	1.287	21.96	9.62	31.58	46.00	14.42	Average
10	1.287	29.70	9.62	39.32	56.00	16.68	QP
11	8.249	34.82	9.67	44.49	50.00	5.51	Average
12	8.249	44.36	9.67	54.03	60.00	5.97	QP

4.2 Radiation Spurious Emissions

Serial Number:	214I-1	Test Date:	2023/2/17~2023/2/22
Test Site:	966-1, 966-2	Test Mode:	Transmitting
Tester:	Vic Du, Mack Huang	Test Result:	Pass

Environmental Conditions:

Temperature: (°C)	23.8~24.8	Relative Humidity: (%)	42~68	ATM Pressure: (kPa)	101.7~102.3
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Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Sunol Sciences	Antenna	JB6	A082520-5	2020/10/19	2023/10/18
R&S	EMI Test Receiver	ESR3	102724	2022/07/15	2023/07/14
TIMES MICROWAVE	Coaxial Cable	LMR-600-UltraFlex	C-0470-02	2022/07/17	2023/07/16
TIMES MICROWAVE	Coaxial Cable	LMR-600-UltraFlex	C-0780-01	2022/07/17	2023/07/16
Sonoma	Amplifier	310N	186165	2022/07/17	2023/07/16
Audix	Test Software	E3	201021 (V9)	N/A	N/A
ETS-Lindgren	Horn Antenna	3115	9912-5985	2020/10/13	2023/10/12
R&S	Spectrum Analyzer	FSV40	101591	2022/07/15	2023/07/14
MICRO-COAX	Coaxial Cable	UFA210A-1-1200-70U300	217423-008	2022/08/07	2023/08/06
MICRO-COAX	Coaxial Cable	UFA210A-1-2362-300300	235780-001	2022/08/07	2023/08/06
Mini	Pre-amplifier	ZVA-183-S+	5969001149	2022/11/09	2023/11/08
PASTERNAK	Horn Antenna	PE9852/2F-20	112002	2021/02/05	2024/02/04
AH	Preamplifier	PAM-1840VH	190	2022/11/09	2023/11/08
MICRO-COAX	Coaxial Cable	UFB142A-1-2362-200200	235772-001	2022/08/07	2023/08/06
E-Microwave	Band Rejection Filter	2400-2483.5MHz	OE01902424	2022/08/07	2023/08/06
Mini Circuits	High Pass Filter	VHF-6010+	31119	2022/08/07	2023/08/06

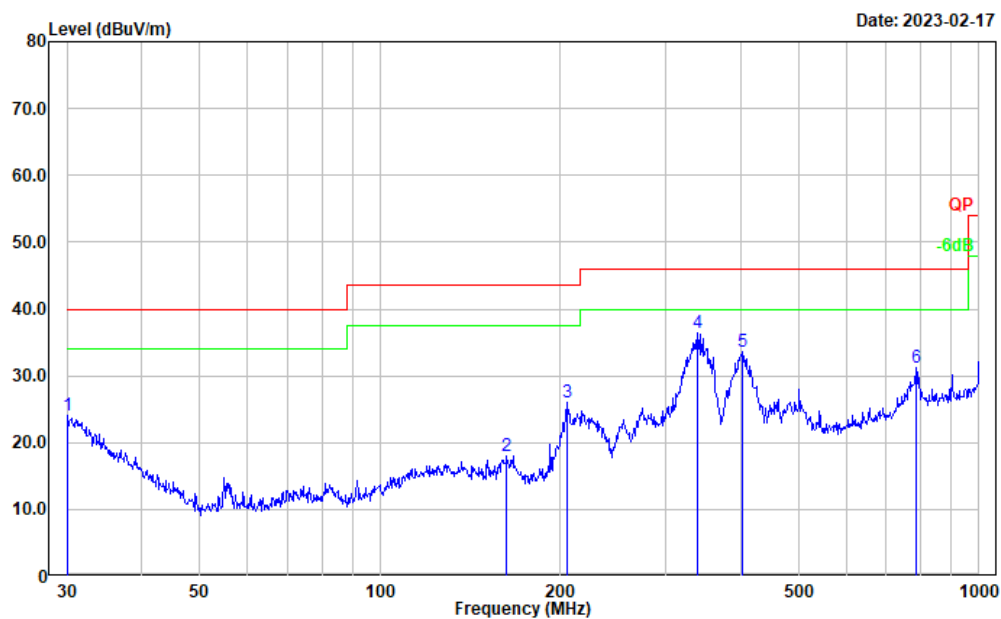
* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

Test Data:

Please refer to the below table and plots.

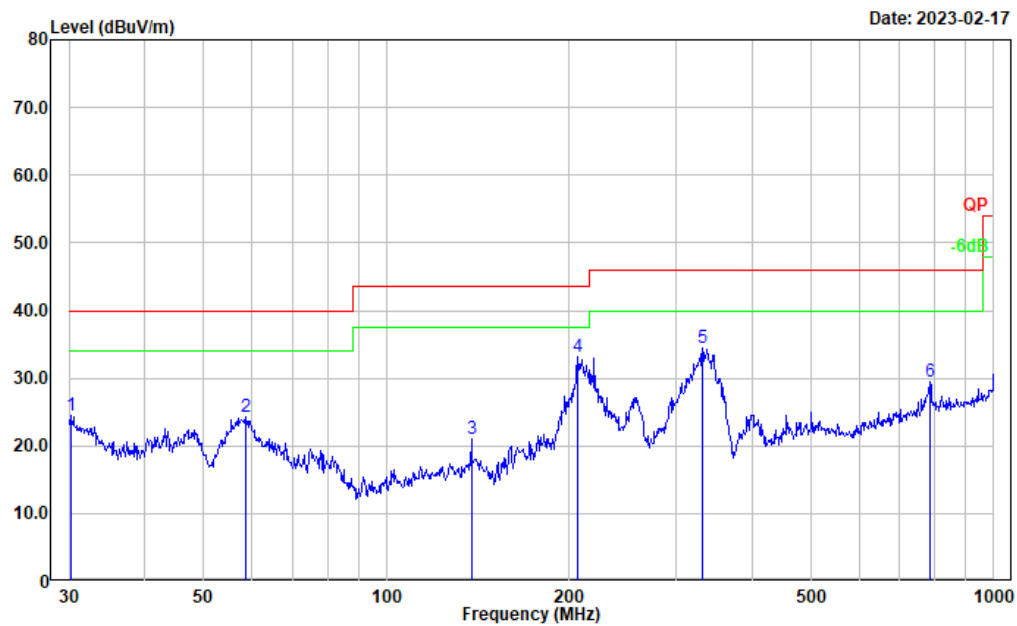
1) 30MHz-1GHz(Low channel was the worst)

Test Mode: Transmitting
Polarization: horizontal
Note:



No.	Frequency (MHz)	Reading (dBμV)	Factor (dB/m)	Result (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
1	30.000	27.60	-3.60	24.00	40.00	16.00	Peak
2	162.611	30.23	-12.31	17.92	43.50	25.58	Peak
3	204.955	38.48	-12.36	26.12	43.50	17.38	Peak
4	339.589	46.42	-10.05	36.37	46.00	9.63	Peak
5	403.250	42.17	-8.67	33.50	46.00	12.50	Peak
6	785.093	33.52	-2.33	31.19	46.00	14.81	Peak

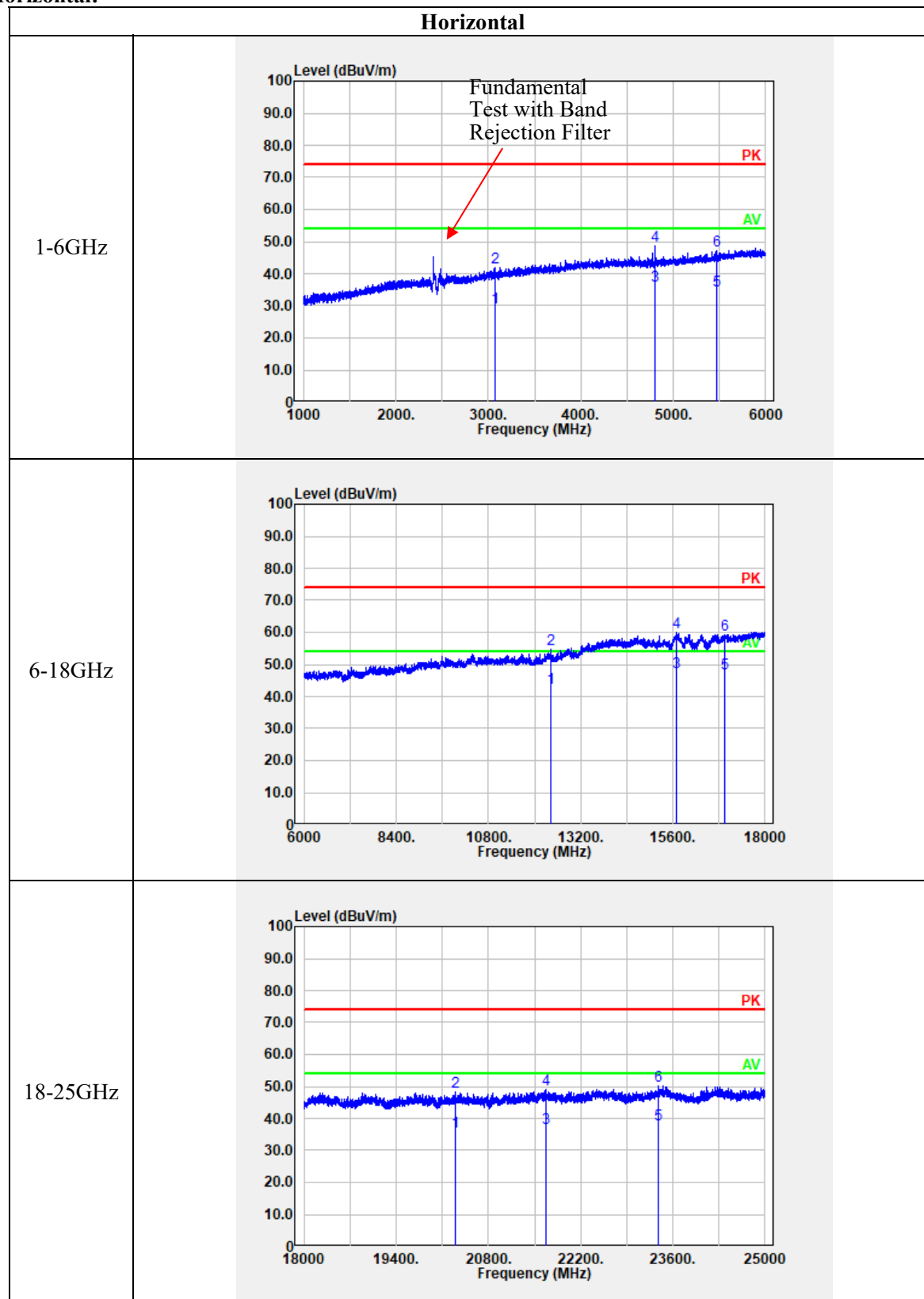
Test Mode: Transmitting
Polarization: vertical
Note:



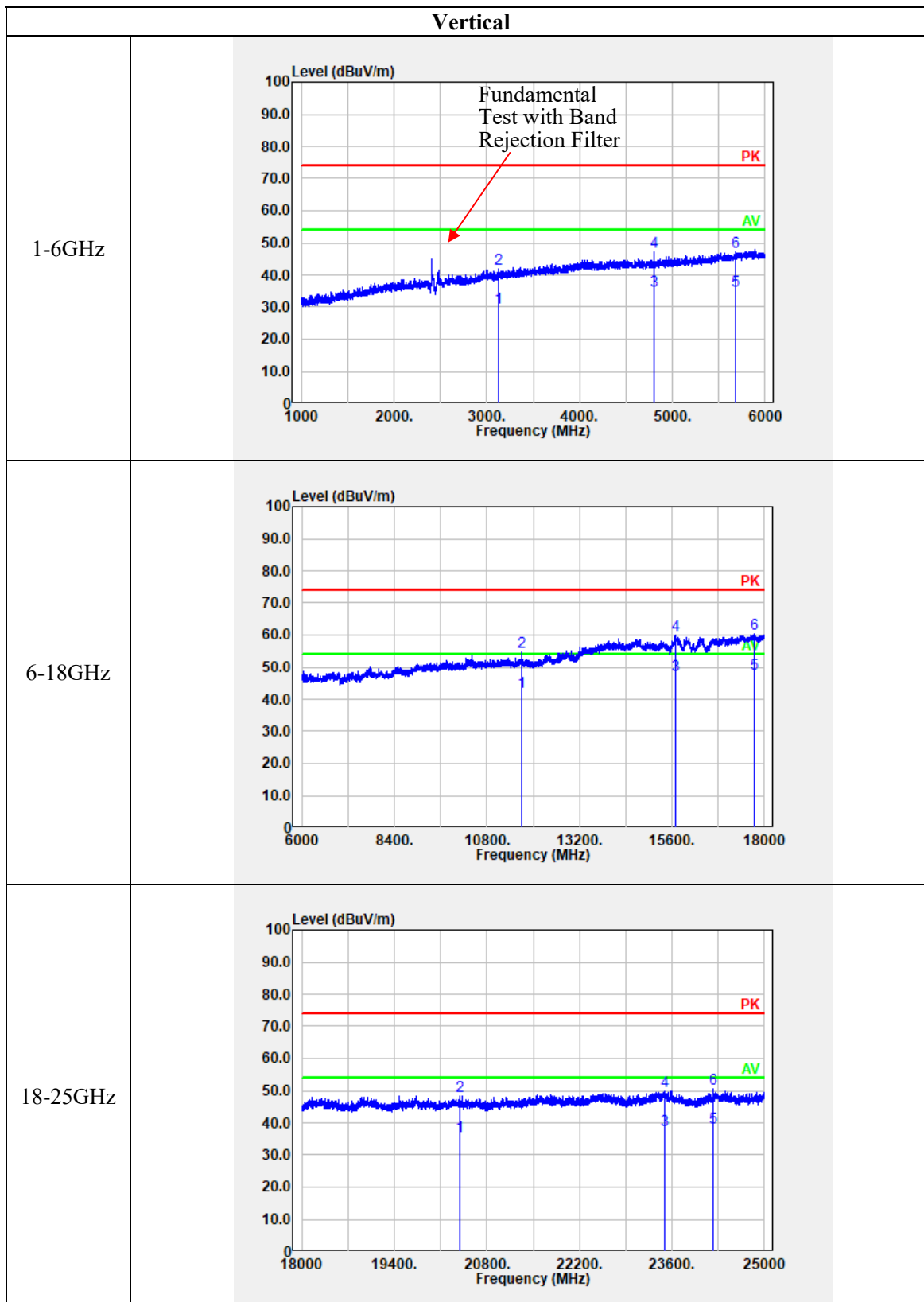
No.	Frequency (MHz)	Reading (dBμV)	Factor (dB/m)	Result (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
1	30.211	28.36	-3.76	24.60	40.00	15.40	Peak
2	58.613	41.74	-17.39	24.35	40.00	15.65	Peak
3	137.903	32.79	-11.79	21.00	43.50	22.50	Peak
4	206.398	45.65	-12.39	33.26	43.50	10.24	Peak
5	331.355	44.58	-10.20	34.38	46.00	11.62	Peak
6	785.093	31.71	-2.33	29.38	46.00	16.62	Peak

**1) 1-25GHz:
BLE 1Mbps:**

Frequency (MHz)	Receiver		Polar (H/V)	Factor (dB/m)	Result (dBμV/m)	Limit (dBμV/m)	Margin (dB)
	Reading (dBμV)	Detector					
Low Channel: 2402 MHz							
2402.000	60.34	PK	H	31.51	91.85	N/A	N/A
2402.000	54.20	AV	H	31.51	85.71	N/A	N/A
2402.000	57.52	PK	V	31.51	89.03	N/A	N/A
2402.000	51.39	AV	V	31.51	82.90	N/A	N/A
2390.000	26.52	PK	H	31.46	57.98	74.00	16.02
2390.000	13.83	AV	H	31.46	45.29	54.00	8.71
4804.000	38.28	PK	H	10.91	49.19	74.00	24.81
4804.000	26.14	AV	H	10.91	37.05	54.00	16.95
7206.000	34.94	PK	H	14.22	49.16	74.00	24.84
7206.000	22.47	AV	H	14.22	36.69	54.00	17.31
Middle Channel: 2440 MHz							
2440.000	59.14	PK	H	31.60	90.74	N/A	N/A
2440.000	53.37	AV	H	31.60	84.97	N/A	N/A
2440.000	58.37	PK	V	31.60	89.97	N/A	N/A
2440.000	52.71	AV	V	31.60	84.31	N/A	N/A
4880.000	37.22	PK	H	11.07	48.29	74.00	25.71
4880.000	25.11	AV	H	11.07	36.18	54.00	17.82
7320.000	34.16	PK	H	14.80	48.96	74.00	25.04
7320.000	22.08	AV	H	14.80	36.88	54.00	17.12
High Channel: 2480 MHz							
2480.000	56.87	PK	H	31.64	88.51	N/A	N/A
2480.000	50.36	AV	H	31.64	82.00	N/A	N/A
2480.000	56.34	PK	V	31.64	87.98	N/A	N/A
2480.000	50.12	AV	V	31.64	81.76	N/A	N/A
2483.500	27.02	PK	H	31.64	58.66	74.00	15.34
2483.500	14.20	AV	H	31.64	45.84	54.00	8.16
4960.000	36.14	PK	H	11.23	47.37	74.00	26.63
4960.000	24.07	AV	H	11.23	35.30	54.00	18.70
7440.000	33.87	PK	H	15.26	49.13	74.00	24.87
7440.000	21.44	AV	H	15.26	36.70	54.00	17.30

Worst Test plots(Low channel was the worst)**Horizontal:**

Vertical



4.3 6 dB Emission Bandwidth:

Serial Number:	214I-1	Test Date:	2023/2/17
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	Pass

Environmental Conditions:

Temperature: (°C)	24.5	Relative Humidity: (%)	45	ATM Pressure: (kPa)	102.5
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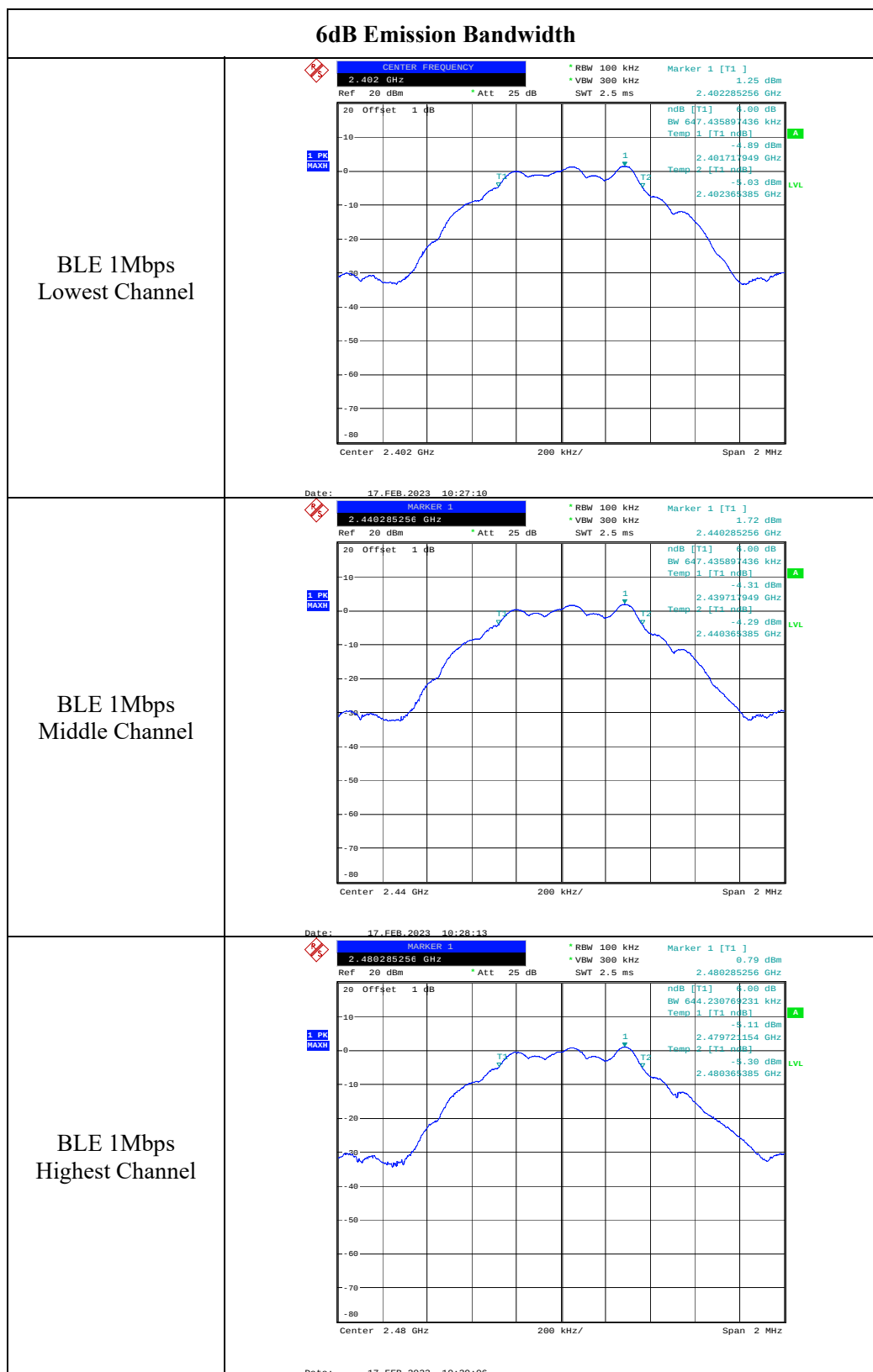
Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	Spectrum Analyzer	FSU26	100147	2022/06/30	2023/06/22
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

Test Data:

Test Channel	Test Frequency (MHz)	6 dB Bandwidth (MHz)	Limit (MHz)
Lowest	2402	0.647	≥ 0.5
Middle	2440	0.647	≥ 0.5
Highest	2480	0.644	≥ 0.5



4.4 99% Occupied Bandwidth:

Serial Number:	214I-1	Test Date:	2023/2/15
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	N/A

Environmental Conditions:

Temperature: (°C)	23.6	Relative Humidity: (%)	47	ATM Pressure: (kPa)	102.5
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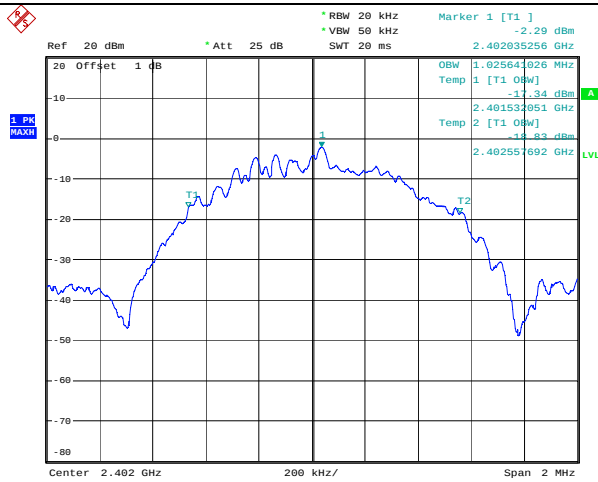
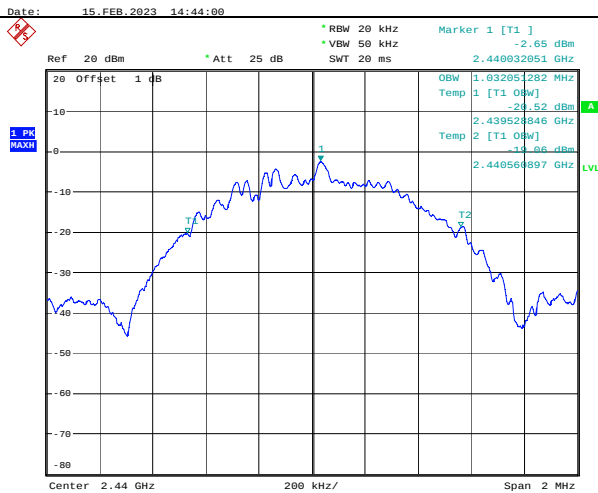
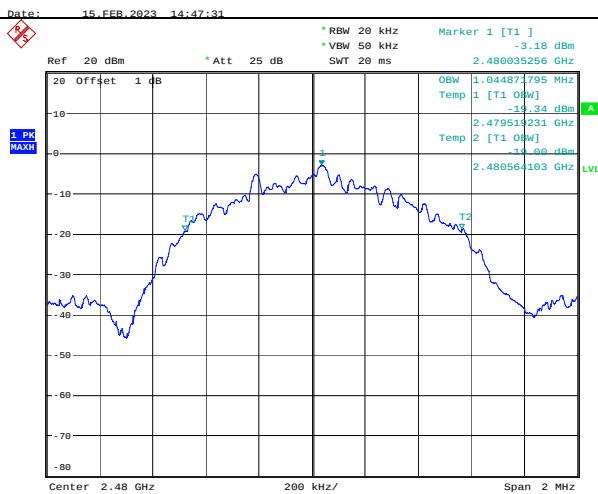
Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	Spectrum Analyzer	FSU26	100147	2022/06/30	2023/06/22
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

** Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).*

Test Data:

Test Channel	Test Frequency (MHz)	99% Occupied Bandwidth (MHz)
Lowest	2402	1.026
Middle	2440	1.032
Highest	2480	1.045

99% Occupied BandwidthBLE 1Mbps
Lowest ChannelBLE 1Mbps
Middle ChannelBLE 1Mbps
Highest Channel

4.5 Maximum conducted output power:

Serial Number:	214I-1	Test Date:	2023/2/17
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	Pass

Environmental Conditions:

Temperature: (°C)	24.5	Relative Humidity: (%)	45	ATM Pressure: (kPa)	102.5
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Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Agilent	USB Wideband Power Sensor	U2021XA	MY54080015	2022/07/15	2023/07/14
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

Test Data:

Test Channel	Test Frequency (MHz)	Maximum Conducted Peak Output Power (dBm)	Limit (dBm)
Lowest	2402	2.09	≤30
Middle	2440	1.84	≤30
Highest	2480	1.66	≤30
Max.EIRP:	2.29	dBm	
EIRP Limit for RSS-247:36 dBm			

4.6 Maximum power spectral density:

Serial Number:	214I-1	Test Date:	2023/2/15
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	Pass

Environmental Conditions:

Temperature: (°C)	23.6	Relative Humidity: (%)	47	ATM Pressure: (kPa)	102.5
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Test Equipment List and Details:

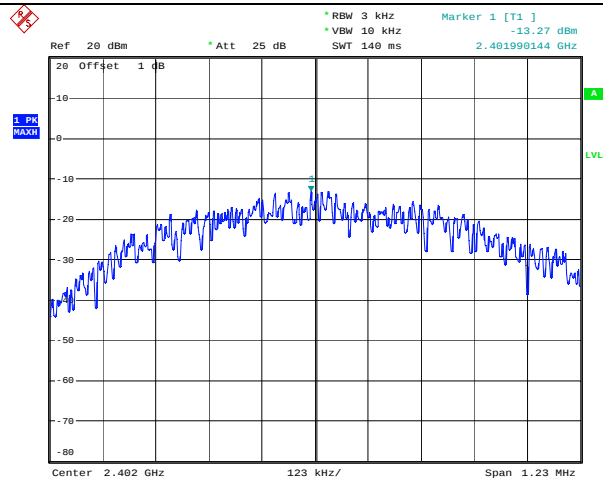
Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	Spectrum Analyzer	FSU26	100147	2022/06/30	2023/06/22
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

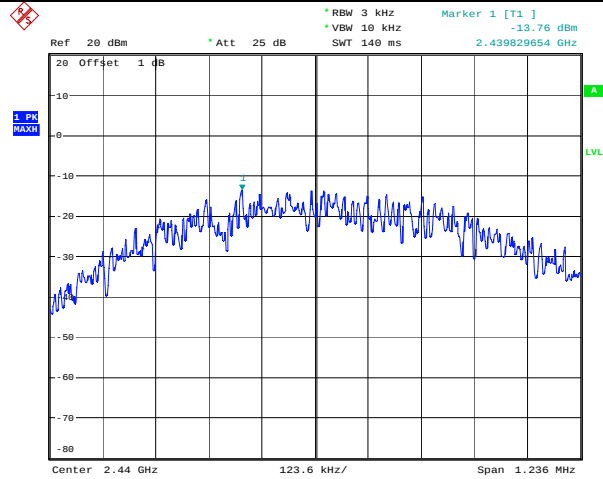
Test Data:

Test Channel	Test Frequency (MHz)	Power Spectral Density (dBm/3kHz)	Limit (dBm/3kHz)
Lowest	2402	-13.27	≤8.00
Middle	2440	-13.76	≤8.00
Highest	2480	-13.50	≤8.00

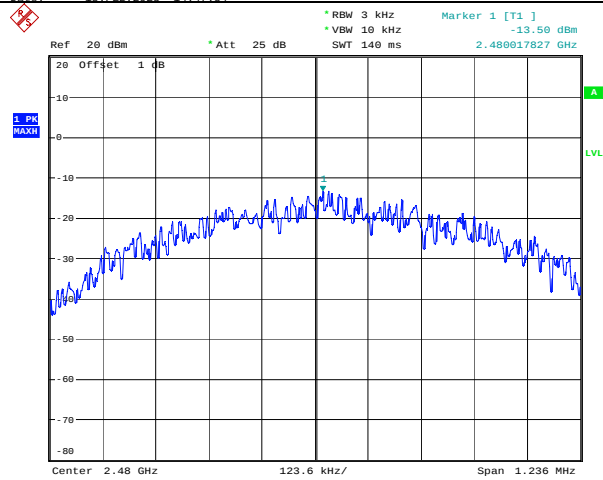
Maximum power spectral density

BLE 1Mbps
Lowest Channel

Date: 15.FEB.2023 14:44:23

BLE 1Mbps
Middle Channel

Date: 15.FEB.2023 14:47:54

BLE 1Mbps
Highest Channel

Date: 15.FEB.2023 14:46:02

4.7 100 kHz Bandwidth of Frequency Band Edge:

Serial Number:	214I-1	Test Date:	2023/2/15
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	Pass

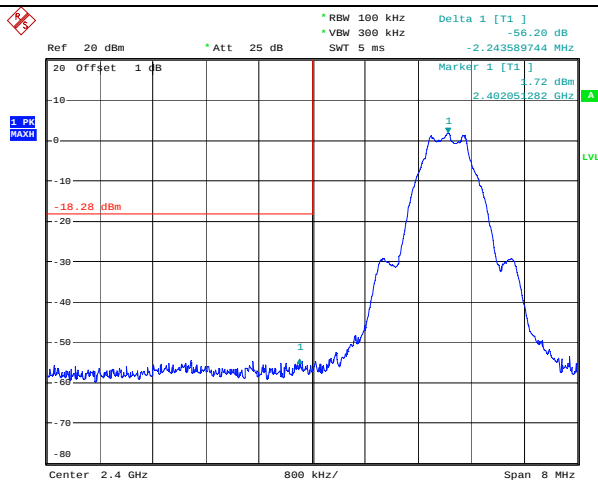
Environmental Conditions:

Temperature: (°C)	23.6	Relative Humidity: (%)	47	ATM Pressure: (kPa)	102.5
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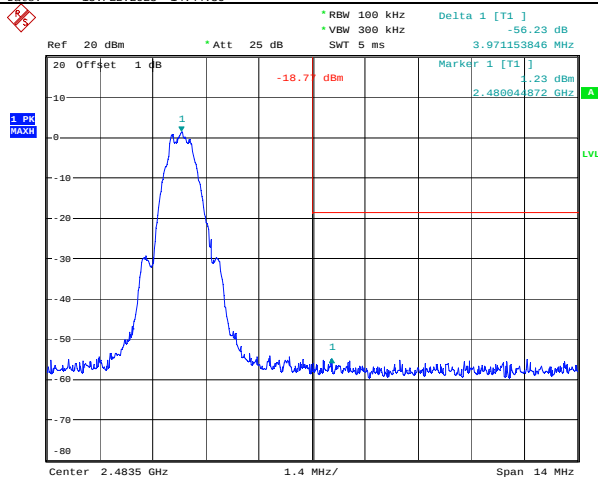
Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	Spectrum Analyzer	FSU26	100147	2022/06/30	2023/06/22
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

** Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).*

100 kHz Bandwidth of Frequency Band EdgeBLE 1Mbps
Lowest Band edge

Date: 15.FEB.2023 14:44:36

BLE 1Mbps
Highest Band edge

Date: 15.FEB.2023 14:46:18

4.8 Duty Cycle:

Serial Number:	214I-1	Test Date:	2023/2/15
Test Site:	RF	Test Mode:	Transmitting
Tester:	Arthur Su	Test Result:	N/A

Environmental Conditions:

Temperature: (°C)	23.6	Relative Humidity: (%)	47	ATM Pressure: (kPa)	102.5
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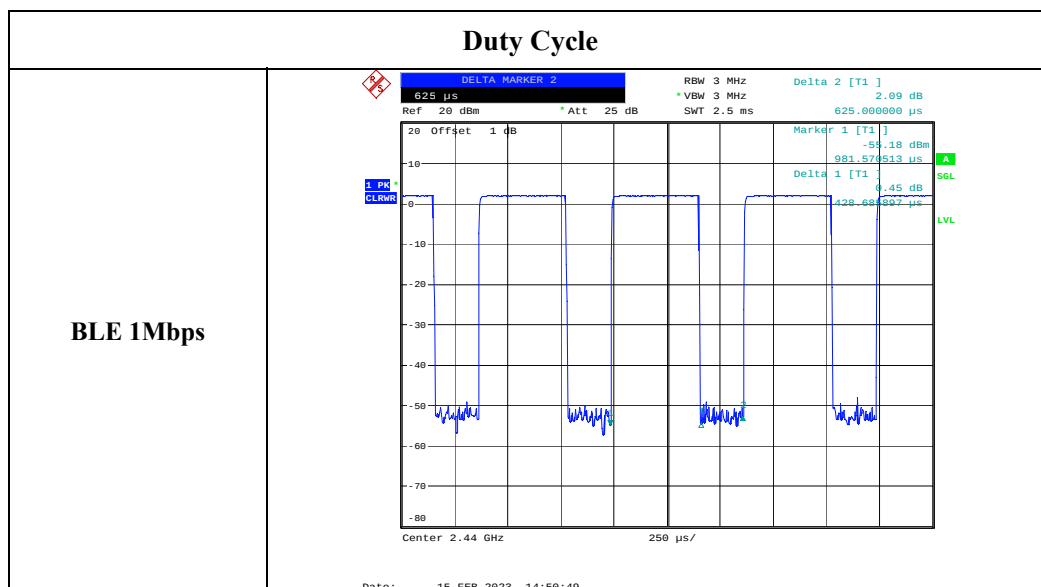
Test Equipment List and Details:

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
R&S	Spectrum Analyzer	FSU26	100147	2022/06/30	2023/06/22
zhuoxiang	Coaxial Cable	SMA-178	211001	Each time	N/A
YINSAIGE	Coaxial Cable	SS402	SJ0100001	Each time	N/A

* Statement of Traceability: China Certification ICT Co., Ltd (Dongguan) attests that all calibrations have been performed, traceable to National Primary Standards and International System of Units (SI).

Test Data:

Test Frequency (MHz)	Ton (ms)	Ton+off (ms)	Duty cycle (%)	1/T (kHz)
2440	0.429	0.625	68.64	2.331



5. RF EXPOSURE EVALUATION

5.1 SAR-Based Exemption

5.1.1 Applicable Standard

FCC §15.247 (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 levels in excess of the Commission's guidelines. See §1.1307(b)(1) of this chapter.

5.1.2 Procedure

According to 447498 D04 Interim General RF Exposure Guidance v01, clause 2.1.3 1- SAR-Based Exemption:

A more comprehensive exemption, considering a variable power threshold that depends on both the *separation distance* and power, is provided in §1.1307(b)(3)(ii)(B). This exemption is applicable to the frequency range between 300 MHz and 6 GHz, with *test separation distances* between 0.5 cm and 40 cm, and for all RF sources in fixed, mobile, and portable device exposure conditions.

Accordingly, a RF source is considered an *RF exempt device* if its available maximum time-averaged (matched conducted) power or its effective radiated power (ERP), whichever is greater, are below a specified threshold. This exemption threshold was derived based on general population 1-g SAR requirements and is detailed in Appendix C.

5.1.3 Measurement Result

Radio	Frequency (MHz)	Distance (mm)	P _{th} (mW)	Maximum Conducted Power including Tune-up Tolerance (dBm)	Antenna Gain (dBi)	The Greater of Conducted Power or ERP		SAR-Based Exemption
						dBm	mW	
BLE	2402-2480	5	2.72	3	0.20	3	2.00	Compliant

Note:

The Maximum Conducted Power including Tune-up Tolerance was declared by manufacturer.

Result: Compliant. RF Exposure is exemption.

5.2 EXEMPTION LIMITS FOR ROUTINE EVALUATION – SAR EVALUATION

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. 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.

Table 1: SAR evaluation – Exemption limits for routine evaluation based on frequency and separation distance⁴⁵

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 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 distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥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

Measurement Result:

The max tune-up conducted power is 3 dBm, Antenna Gain: 0.2 dBi, so EIRP is 3.2 dBm(2.09 mW)

The exemption power(P) limits for routine evaluation in 2402-2480MHz is:

$$(2480-2450)/(3500-2450)=(P-4)/(2-4)$$

$$\Rightarrow P=3.94 \text{ mW}@2480 \text{ MHz}$$

$$> 2.09\text{mW}$$

So the stand-alone SAR evaluation can be exempted.

===== END OF REPORT =====