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FCC CFR47 PART 15 SUBPART C & IC RSS-247

TEST REPORT

For

Centrak, Inc.

**IoT Universal Transmitter
Model Number: IT-731E**

FCC ID: ST2-IT726

Report Number: 0048-210727-01-FCC-IC

Prepared for

Centrak, Inc.

**826 Yardley-Newtown
Newtown, PA 18940, USA**

Prepared by

Advanced Compliance Laboratory, Inc.

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Date: 8/18/2021

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1. TEST RESULT CERTIFICATION

COMPANY NAME: Centrak, Inc.
826 Yardley-Newtown
Newtown, PA 18940, USA

EUT DESCRIPTION: IoT Universal Transmitter

MODEL: IT-731E

DATE TESTED: 07/27/2021 to 8/18/2021

APPLICABLE STANDARDS	
STANDARD	TEST RESULTS
FCC Part 15.247	NO NON-COMPLIANCE NOTED

Test Summary

Testing Items Per FCC Part 2/ Part 15.247 & IC RSS-247 /RSS-Gen Standard Requirements for 900MHz band FHS Modulation	Section	Limit	Result
FHS Bandwidth	15.247(a) (1)(i) RSS-247, 5.1(a)	20dB BW<=500KHz	Complies**
Peak Power Limit	15.247(b) (2) RSS-247, 5.4(a)	Conducted: 1W (30dBm) for Hopping Channel at least 50 or 0.25W (24dBm) for Hopping Channel less than 50 but at least 25. Max. e.i.r.p. 4W or 1W	Complies**
Hopping Channel Separation	15.247(a) (1) RSS-247, 5.1(b)	>=25 kHz or 20 dB BW of Hopping Channel (greater one)	Complies*
Number of Hopping Frequency	15.247(a) (1)(i) RSS-247, 5.1(c)	At least 50 if 20dB BW<250KHz; At least 25 if 20dB BW>=250KHz	Complies*
Time of Occupancy (Dwell Time)	15.247(a)(1)(i) RSS-247, 5.1(c)	0.4s within 20s if 20dB BW<250KHz; 0.4s within 10s if 20dB BW>=250KHz	Complies*
Emissions (Conducted)	15.247(d) RSS-247, 5.5	-20dB (peak, 100KHz RBW)/-30dB(RMS)	Complies**
Spurious (Radiated)	15.205(a) RSS-247, 5.5	15.209(a)/RSS-Gen	Complies

FHS Design Requirement	Part 15.247(g) (h)	Provided in Operational Description	Complies*
RF Safety***	1.1310/RSS-102	1.0/5.0 mW/cm ² & RSS-102 Table 1/ Section 2.5	Complies*

NOTE: * Complete conducted measurement results (no change) taken at Antenna port RF1 can be founded in its original filling report # 0048-181112-01-FCC-IC.

** Selected conducted power, OCBW and emissions at middle channel were measured for verification purpose.

*** For mobile or fixed location transmitters, the minimum separation distance is 20 cm, even if calculations indicate that the MPE distance would be less.

Advanced Compliance Laboratory, Inc. tested the above equipment in accordance with the requirements set forth in the above standards. The test results show that the equipment tested is capable of demonstrating compliance with the requirements as documented in this report.

Note : This document reports conditions under which testing was conducted and results of tests performed. This document may not be altered or revised in any way unless done so by Advanced Compliance Laboratory, Inc. (ACL) and all revisions are duly noted in the revisions section. Any alteration of this document not carried out by ACL, Advanced Compliance Laboratory, Inc. will constitute fraud and shall nullify the document.

Approved & Released For ACL By:

Tested By:



Wei Li

David Tu

Manager
Advanced Compliance Laboratory, Inc.

EMC Engineer

2. EUT DESCRIPTION

The EUT for this certification is a low power transmitter, using digital modulation & operating in the 902-928MHz Band.

The transmitter has a maximum conducted output power as follows:

Frequency Range (MHz)	Rated Power	Measured Max. Conducted Output Power (dBm/W)	
905.007-918.007	12dBm/0.016W	12.09dBm/ 0.016W	

The EUT has one PCB antenna with max 0dBi gain.

With max. 0dBi gain antenna, the max. EIRP =12.09dBm (0.016 W) , which meets FCC limit.

EUT Specification:

Data Speed (Mbps)	Operation Frequency (MHz)	Modulation Type	Measured Peak Power at Antenna port (dBm/W)	Occupied Bandwidth (KHz)	Emission Designator
1	905.007-918.007	2-GFSK	12.11/0.016	134.3	134KF1D

Power Supply for EUT: +3VDC (battery)

3. TEST METHODOLOGY

The tests documented in this report were performed in accordance with ANSI C63.4(2014)/C63.10(2013), FCC CFR 47 Part 2 & 15 and IC RSS-247(Issue 2) & RSS-GEN (Issue 5). Test procedure described in FCC Public Notice “KDB 558074 D01 V05 & ANSI C63.10 is used in this report.

4. FACILITIES AND ACCREDITATION

The test sites and measurement facilities used to collect data are located at Hillsborough, New Jersey, USA. The sites are constructed in conformance with the requirements of ANSI C63.4, ANSI C63.7 and CISPR Publication. All receiving equipment conforms to CISPR Publication 16-1, “Radio Interference Measuring Apparatus and Measurement Methods”

ACL site is accepted by FCC to perform measurements under Part 15 or 18 (Designation Number US5347) and also designated by IC as “site IC 3130A”. ACL is accredited by NVLAP, Laboratory Code 200101-0. The full accreditation can be viewed at <http://www.ac-lab.com>



No part of this report may be used to claim or imply product endorsement by NVLAP or any agency of the US Government.

5. CALIBRATION AND UNCERTAINTY

5.1. MEASURING INSTRUMENT CALIBRATION

The measuring equipment utilized to perform the tests documented in this report has been calibrated in accordance with the manufacturer's recommendations, and is traceable to recognized national standards.

5.2. MEASUREMENT UNCERTAINTY

The estimated uncertainty of the test result is given as following. The method of uncertainty calculation is provided in Advanced Compliance Lab. Doc. No. 0048-01-01.

	Prob. Dist.	Uncertainty(dB)	Uncertainty(dB)	Uncertainty(dB)
		30-1000MHz	1-6.5GHz	Conducted
Combined Std. Uncertainty u_c	norm.	± 2.36	± 2.99	± 1.83

5.3. TEST AND MEASUREMENT EQUIPMENT

The following test and measurement equipment was utilized for the tests documented in this report:

Manufacturer	Model	Serial No.	Description	Cal Due mm/dd/ yy
Agilent	E4440A	US40420700	3Hz-26.5GHz Spec. Analyzer	6/17/22
R & S	ESPI	100018	9KHz-7GHz EMI Receiver	8/25/21
HP	HP8546A	3448A00290	9kHz to 6.5GHz EMI Receiver	9/25/21
EMCO	3104C	9307-4396	20-300MHz Biconical Antenna	11/12/21
EMCO	3146	9008-2860	200-1000MHz Log-Periodic Antenna	11/13/21
Electro-Meterics	ALR-25M/30	289	10KHz-30MHz Active Loop Antenna	5/28/22
EMCO	3115	4945	Double Ridge Guide Horn Antenna	11/28/21
ARA	MWH-1826/B	1013	18-26GHZ Horn Antena	10/2/21
R&S	SMH	8942280/010	Signal Generator	
RES-NET	RFA500NFF 30	0108	30dB in-line Power Attenuator	
Lorch Microwave	5NF-800/10 00-S	AC3	Notch Filter	
Lorch Microwave	5NF-1800/2 200-S	AE10	Notch Filter	
Narda	3022	80986	Directional Coupler	
Lorch Microwave	5NF-800/10 00-S	AC3	Notch Filter	

All Test Equipment Used is Calibrated, Traceable to NIST Standards. Calibration interval: 2 years

6. SETUP OF EQUIPMENT UNDER TEST

SUPPORT EQUIPMENT

None.

TEST SETUP

Testing Frequency/Channel/Port Selection:

- **L**(owest), **M**(iddle), **H**(ighest) Channels of 900MHz Band were selected to perform the radiated tests
- **M**(iddle) Channel of 900MHz Band was selected to perform conducted power, OCBW and emission tests for verification.
- Conducted measurement performed at EUT's antenna connector.
- Modulation: 2-GFSK
- EUT was set in continuous transmitting mode with modulation (hopping or non-hopping)

Frequency settings:

Mode	#1 Tx	#2 Rx
Modulation	2-GFSK	
Lowest Channel (L)	905.007	
Middle Channel (M)	911.507	911.507
Highest Channel (H)	918.007	

7. APPLICABLE LIMITS AND TEST RESULTS

7.1 20dB &99% BANDWIDTH

LIMIT

§15.247 (a) (1) & RSS-247 Sec. 5.1(a):

Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

(i) For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 20 second period; if the 20 dB bandwidth of the hopping channel is 250 kHz or greater, the system shall use at least 25 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period. The maximum allowed 20 dB bandwidth of the hopping channel is 500 kHz.

The system's radio frequency (RF) bandwidth is equal to the channel bandwidth multiplied by the number of channels in the hop set.

TEST PROCEDURE *per FCC Public Notice KDB 558074 D01 V05 & ANSI C63.10*

The transmitter output is connected to a spectrum analyzer. The RBW is set to 1% to 3% of the 99% bandwidth. The VBW/RBW is set to one or three. The sweep time is coupled.

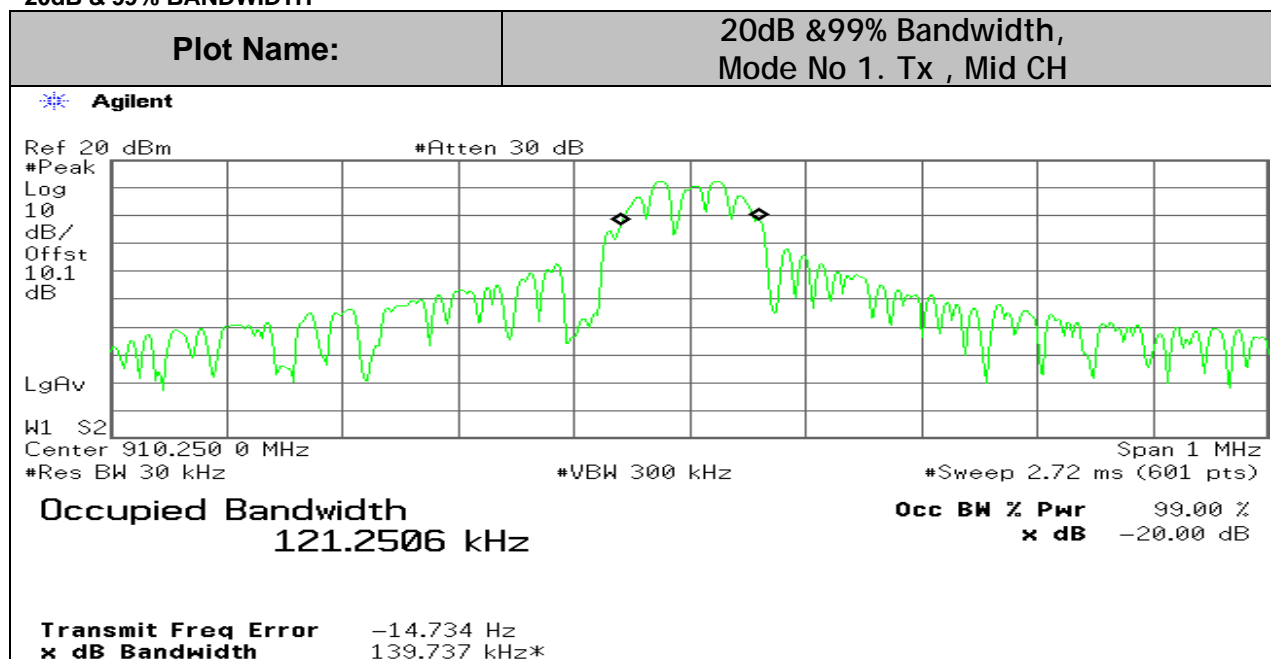
RESULTS

No non-compliance noted.

Mode No.1: Tx

Channel	Frequency (MHz)	20dB Bandwidth (KHz)	99% Bandwidth (KHz)
Middle	910.250	139.737	121.2506

20dB & 99% BANDWIDTH



7.2 MAXIMUM OUTPUT POWER

PEAK POWER LIMIT

§15.247 (b)(2) & RSS-247 Sec. 5.4(a)

For frequency hopping systems operating in the 902-928 MHz band: 1 watt for systems employing at least 50 hopping channels; and, 0.25 watts for systems employing less than 50 hopping channels, but at least 25 hopping channels, as permitted under paragraph (a)(1)(i) of this section.

The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi.

b(4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Therefore, the applicable output power limit shall be calculated as follows:

$$P_{out} = 30 - (G_{tx} - 6) \text{ for antenna gain } \leq 6 \text{ dBi or}$$

$$P_{out} = 30 - \text{Floor}[(G_{tx} - 6)/3]$$

G_{Tx} = the maximum transmitting antenna directional gain in dBi.

TEST PROCEDURE *per FCC Public Notice KDB 558074 D01 V05 & ANSI C63.10*

The transmitter output is connected to a spectrum analyzer and the analyzer bandwidth is set to a value greater than the 20 dB bandwidth of the EUT.

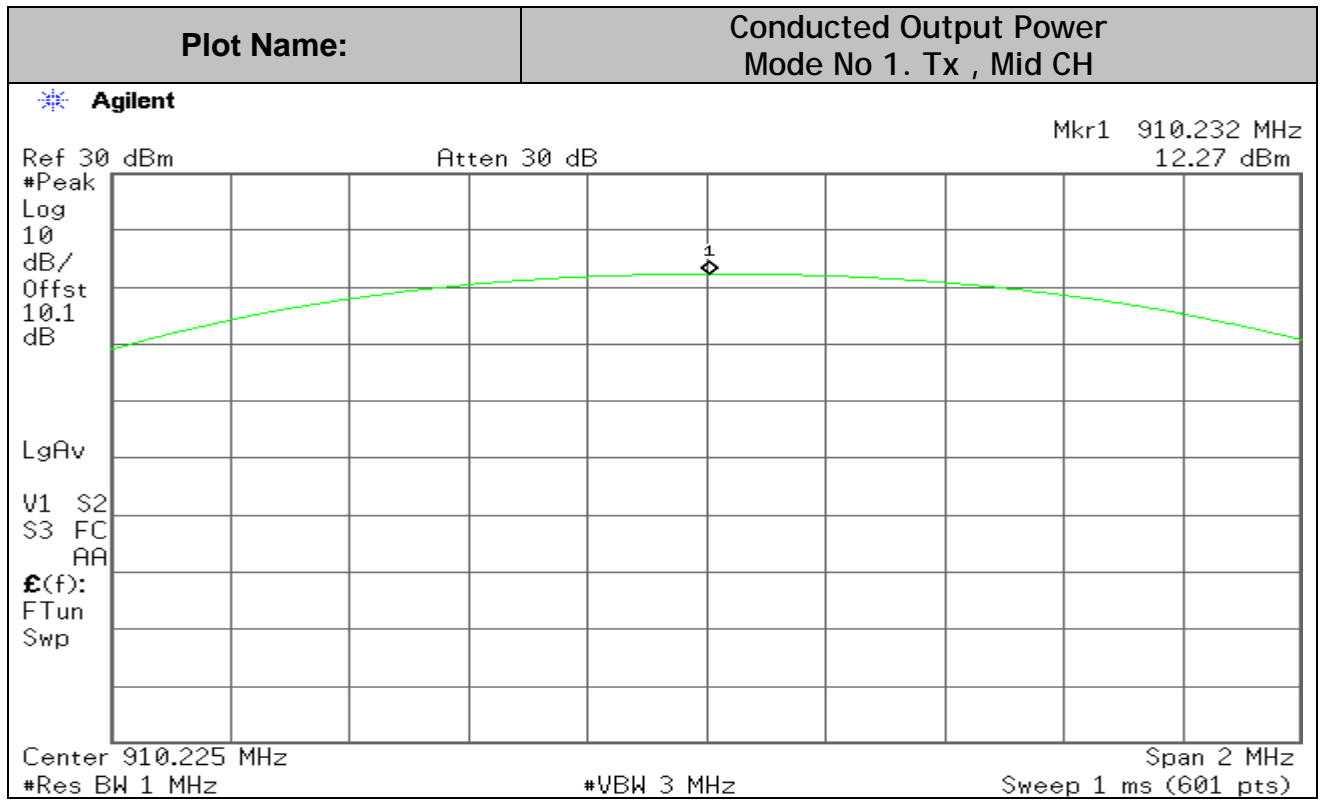
TEST RESULT

No non-compliance noted.

With max. 0dBi gain PCB antenna, the max. EIRP limit is 12.09dBm/0.016W, which is under 4W/36dBm limit (Frequency Hopping channel number is 50 for this EUT).

Mode No.1 Tx

Channel	Frequency (MHz)	Output Power* (dBm)	Limit (dBm)	Margin (dB)
Middle	911.507	12.09	30	-17.73



7.3 CONDUCTED SPURIOUS EMISSIONS

LIMITS

§15.247 (d) & RSS- 247 Sec. 5.5

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

TEST PROCEDURE *per FCC Public Notice KDB 558074 D01 V05 & ANSI C63.10*

The transmitter output is connected to a spectrum analyzer. The resolution bandwidth is set to 100 kHz. The video bandwidth is set to 100 or 300KHz.

The spectrum from 20 MHz to 10 GHz was investigated with the transmitter set to the lowest, middle, and highest channels with hopping ON or OFF.

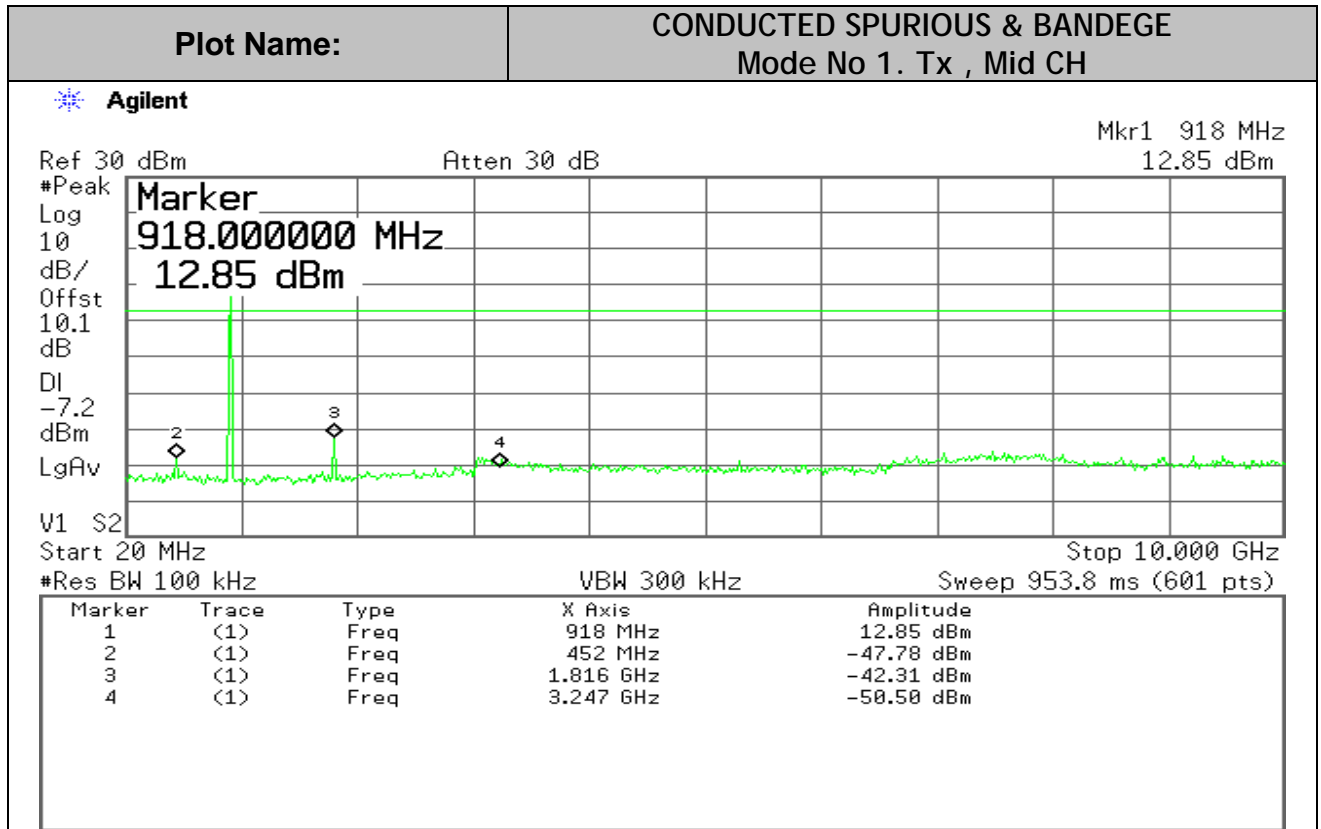
RESULTS

Complied with 20dBc attenuation requirement.

Data Summary:

Mode No.1 Tx

Channel	Frequency (MHz)	Hopping	Attenuation (dBc) to max. Spurious Emission Level
Middle	911.507	Off/On	>>20dBc

Spurious via Conducted Measurement:

7.4 RADIATED EMISSIONS

7.4.1. TRANSMITTER RADIATED SPURIOUS EMISSIONS

LIMITS

§15.205 (a) RSS-102 Except as shown 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	399.9-410	4.5-5.15
¹ 0.495-0.505	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2690-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	(²)
13.36-13.41			

¹ Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz.

² Above 38.6

§15.205 (b) Except as provided in paragraphs (d) and (e), the field strength of emissions appearing within these frequency bands shall not exceed the limits shown in Section 15.209. At frequencies equal to or less than 1000 MHz, compliance with the limits in Section 15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1000 MHz, compliance with the emission limits in Section 15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in Section 15.35 apply to these measurements.

§15.209 (a) 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 (microvolts /meter)	Measurement Distance (meters)
30 – 88	100	3
88 – 216	150	3
216 – 960	200	3
Above 960	500	3

§15.209 (b) In the emission table above, the tighter limit applies at the band edges.

TEST PROCEDURE

The EUT is placed on a non-conducting table 80 cm above the ground plane. The antenna to EUT distance is 3 meters. The EUT is configured in accordance with ANSI C63.4. The EUT is set to transmit in a continuous mode. Established procedures in C63.10 for performing radiated measurements shall be used. For cabinet emission measurements, the EUT transmit antenna may be replaced with a termination matching the nominal impedance of the antenna. EUT was tested with applicable orientations.

For measurements below 1 GHz the resolution bandwidth is set to 100 kHz for peak detection measurements or 120 kHz for quasi-peak detection measurements. Peak detection is used unless otherwise noted as quasi-peak. For measurements above 1 GHz the resolution bandwidth is set to 1 MHz, and then the video bandwidth is set to 1 MHz for peak measurements and 10 Hz for average measurements.

The radio spectrum was investigated from the lowest frequency generated within the device (without going below 9 kHz) up to the 10th harmonic of the rated transmitted emission. The emissions are investigated with the transmitter set to the lowest, middle, and highest channels.

The emissions are investigated with the transmitter set to the lowest, middle, and highest channels, if applicable. The frequency range of interest is monitored at a fixed antenna height and EUT azimuth. The EUT is rotated through 360 degrees to maximize emissions received. The antenna is scanned from 1 to 4 meters above the ground plane to further maximize the emission. Measurements are made with the antenna polarized in both the vertical and the horizontal positions.

RESULTS

No non-compliance noted.

*The duty cycle factor can be applied to the average readings of above 1GHz spurious, if necessary.

During the search process, the 50 frequencies are transmitted . Each with 20 mS transmission and waiting for an ACK for 20 mS. So the maximum duty cycle per frequency is 20% (for 100 ms period), i.e -14dB.

7.4.2. TRANSMITTER RADIATED EMISSIONS DATA

(HARMONICS & SPURIOUS falling in restricted bands listed in Sec.15.205)

Worst Case of Operation Modes: Tx**

Low Channel Harmonics/Spurious

Freq. (MHz)	Worst H/V	Dist. (m)	D Corr (dB)	Peak@3m (dBuV/m)	QP/Avg @3m (dBuV/m)	PK Lim (dBuV/m)	QP /Avg. Lim (dBuV/m)	PK Marg. (dBuV/m)	QP /Avg.Marg* (dBuV/m)
1810***	H	3	-	43.9					
2715	H	3	-	47.3	42.5	74	54	-26.7	-11.5
1810**	V	3	-	49.3					
2715	V	3	-	51.8	47.0	74	54	-22.2	-7.0

Middle Channel Harmonics/Spurious

Freq. (MHz)	Worst H/V	Dist. (m)	D Corr (dB)	Peak@3m (dBuV/m)	QP/Avg @3m (dBuV/m)	PK Lim (dBuV/m)	QP /Avg. Lim (dBuV/m)	PK Marg. (dBuV/m)	QP /Avg.Marg* (dBuV/m)
1823***	H	3	-	48.1					
2734.5	H	3	-	48.4	43.5	74	54	-25.6	-10.5
1823***	V	3	-	52.2					
2734.5	V	3	-	52.1	47.2	74	54	-21.9	-6.8

High Channel Harmonics/Spurious

Freq. (MHz)	Worst H/V	Dist. (m)	D Corr (dB)	Peak@3m (dBuV/m)	QP/Avg @3m (dBuV/m)	PK Lim (dBuV/m)	QP /Avg. Lim (dBuV/m)	PK Marg. (dBuV/m)	QP /Avg.Marg* (dBuV/m)
1836***	H	3	-	47.2					
2754	H	3	-	47.3	43.0	74	54	-26.7	-11.0
1836***	V	3	-	52.9					
2754	V	3	-	51.6	46.9	74	54	-22.4	-7.1

* The duty cycle factor, -14dB was not applied to the average readings of above 1GHz spurious for comparing to the final average limit due to its low emissions.

**Data shown above represents the worst case in typical EUT orientation(s). No other significant emissions were found in the rest frequency range. For spurious in restricted band, the limit is per 15.209. For low emission levels, peak readings were used for average limit margin calculation.

*** Some harmonics are not falling in restricted band and recorded for reference only.

Band Edge Data for EUT

In addition, the band-edge requirements are also verified.

Testing procedure per FCC Public Notice KDB 558074 D01 V05 & ANSI C63.10 / KDB 558074D01:

The measurement of unwanted emissions at the edge of the authorized frequency bands can be complicated by the capture of RF energy from the fundamental emission within the RBW passband. The following techniques are permitted for use in performing a measurement of the unwanted emission level at the band edges.

10.2.5.1 Marker-Delta Method

The marker-delta method, as described in KDB 913591 and in C63.10, can be used to perform measurements of the unwanted emissions level at the band-edges.

10.2.5.2 Integrated Power Measurement

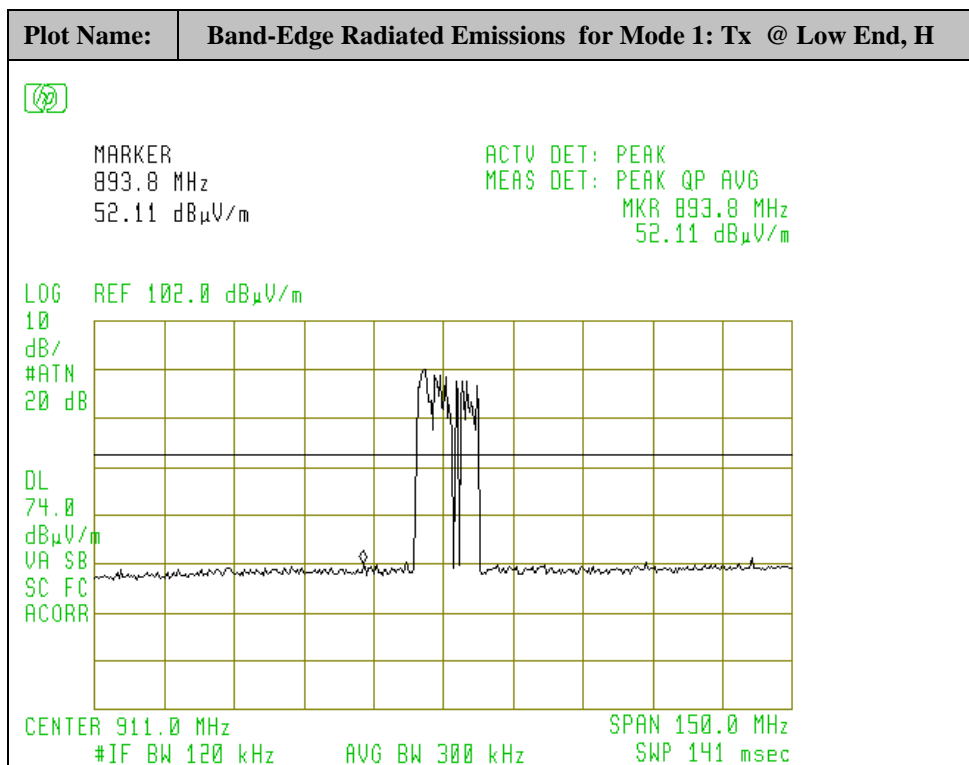
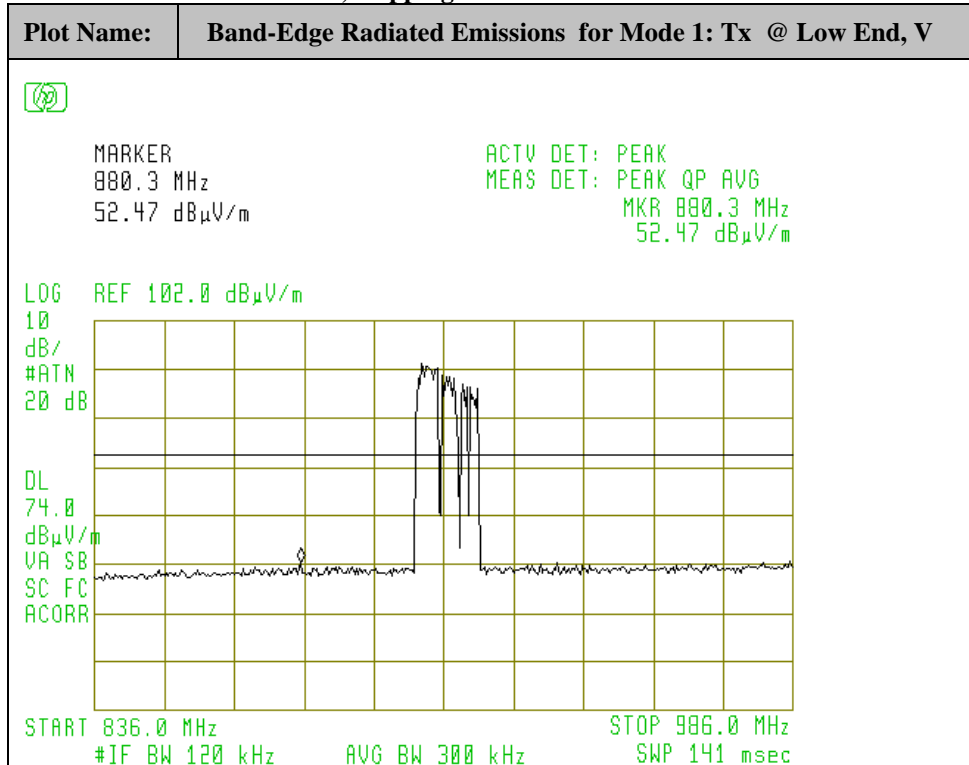
A narrower resolution bandwidth can be used at the band edge to improve the measurement accuracy provided that the measurement is subsequently integrated to the relevant bandwidth specification (e.g., 100 kHz within non-restricted bands and 1 MHz within restricted frequency bands).

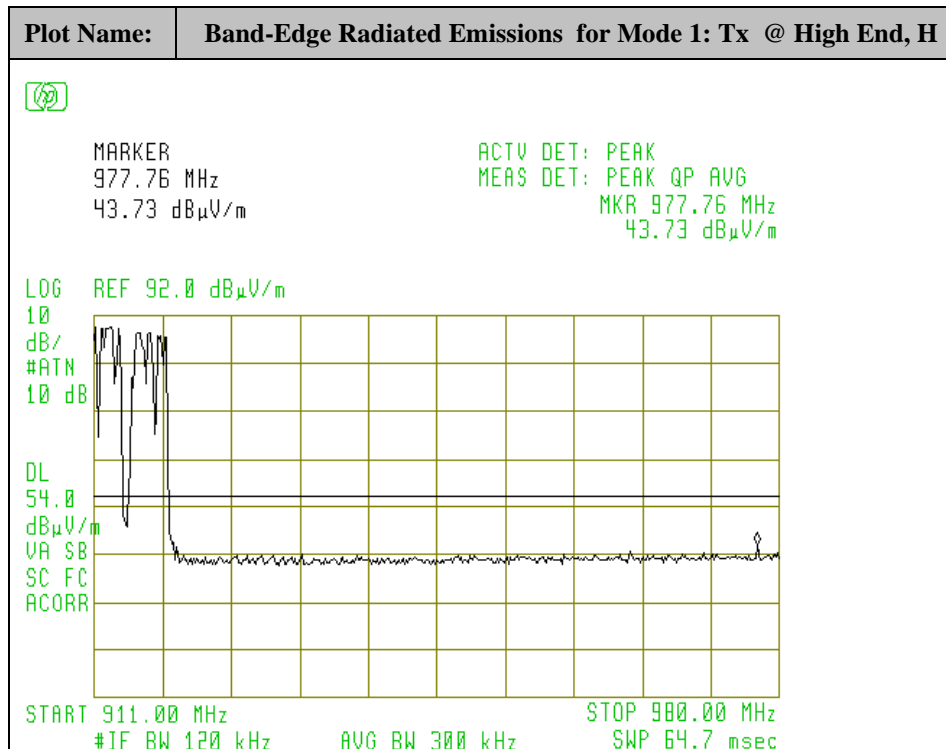
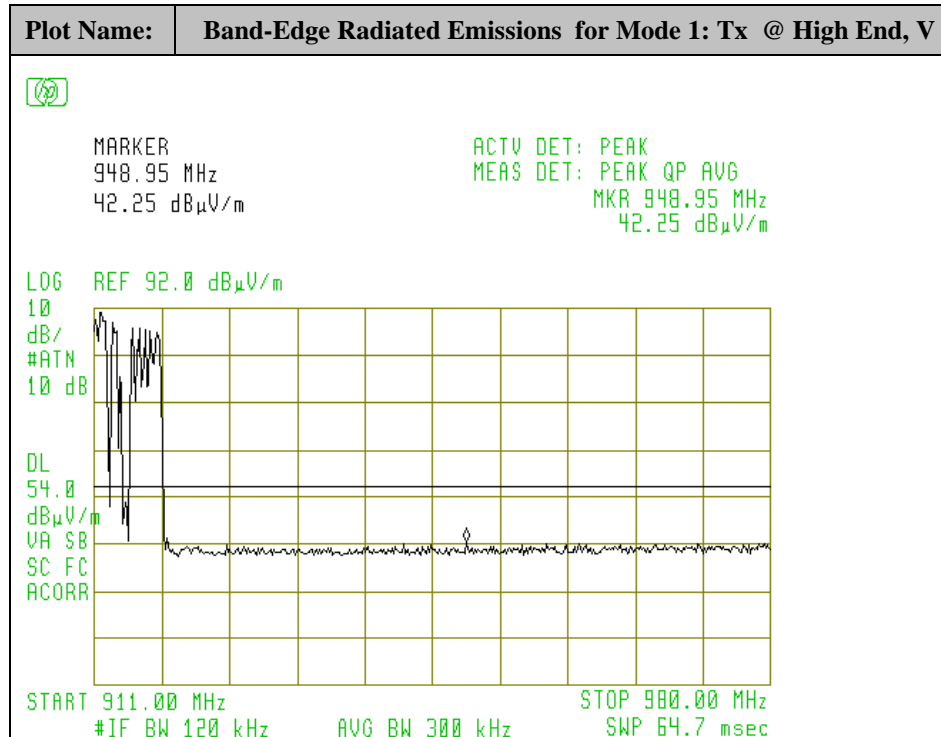
Results:

The testing results **for worst case** based on pretesting results are shown as following and comply with the band-edge requirements and restricted band emission requirements (the closest restricted band is $\leq 614\text{MHz}$ & $\geq 960\text{MHz}$, which is far from 902-928MHz Tx band).

The duty cycle factor can be applied to the average readings of band edge spurious, if necessary.

Only the antenna with highest gain in each antenna type (if applicable) was selected for final emission test.

EUT with internal PCB antenna, Hopping On



7.5 EUT RECEIVING MODE VERIFICATION

Radiated Test Data for Receiving Mode (worst case) at RX

Frequency (3) (MHz)	Polarity (H,V)	Antenna Height (m)	Azimuth (Degree)	Peak Reading at 3m (2) (dBuV/m)	Q-Peak/ Average Reading (dBuV/m)	FCC/IC 3m Limit (1) (dBuV/m)	Difference (dBuV/m)
40.6	H	1.8	330	34.0		40.0	-6.0
143.9	H	1.8	270	36.2		43.5	-7.3
152.4	H	1.6	270	37.1		43.5	-6.4
173.2	H	1.6	225	37.8		43.5	-5.7
200	H	1.6	090	34.2		43.5	-9.3
220	H	1.6	090	33.4		46.5	-13.1
230	H	1.1	135	34.9		46.5	-11.6
248	H	1.1	180	36.2		46.5	-10.3
354	H	1.0	180	33.7		46.5	-12.8
950	H	1.0	225	41.3		46.5	-5.2
154.1	V	1.2	315	35.6		43.5	-7.9
161.3	V	1.2	225	37.5		43.5	-6.0
168.1	V	1.1	180	36.5		43.5	-7.0
180.9	V	1.1	135	35.8		43.5	-7.7
187.3	V	1.1	135	35.3		43.5	-8.2
300	V	1.1	315	32.7		46.5	-13.8
314	V	1.1	315	33.2		46.5	-13.3
430	V	1.1	270	35.6		46.5	-10.9
826	V	1.1	330	40.8		46.5	-5.7
945	V	1.1	315	41.1		46.5	-5.4

(1) Receiving mode spurious emissions shall be lower than the limit defined in FCC Sec. 15.209 & IC RSS-GEN.

(2) If the peak reading is less than the FCC/IC quasi-peak or average limit, it'll be not necessary to show the measured/ calculated quasi-peak or average reading.

(3) Emissions from non-EUT accessories shall be excluded.