



# Test report

REP027851-2TRFWL

Date of issue: March 15, 2023

Applicant:

TrellisWare Technologies, Inc

Product:

TW-875 Ghost Radio with battery

Model:

TW-875

FCC ID:

2A6X2-875

Variant(s):

TW-870 Embedded Radio  
(without internal battery)

IC:

28565-875

Specifications:

- ◆ FCC 47 CFR Part 15, Subpart C – §15.247  
Operation within the bands 902 – 928 MHz, 2400 – 2483.5 MHz, 5725 – 5850 MHz
- ◆ Industry Canada RSS-247, Issue 2, February 2017  
Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices

**Lab and test locations**

|                    |   |
|--------------------|---|
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| City               | Carlsbad  |
| State              | California  |
| Postal code        | 92008   |
| Country            | USA   |
| Telephone          | +1 760 444 3500   |
| Website            | <a href="http://www.nemko.com">www.nemko.com</a>                                  |
| FCC Site Number    | Test Firm Registration Number: 392943; Designation Number: US5058                 |
| ISED Test Site     | 2040B-3   |
| Tested by          | Chenho Ma, Wireless Test Technician   |
| Reviewed by        | James Cunningham, EMC/MIL/WL Supervisor   |
| Review date        | March 15, 2023  |
| Reviewer signature |  |

**Limits of responsibility**

Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contained in this report are within Nemko USA's ISO/IEC 17025 accreditation.

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## Section 1 Report summary

### 1.1 Test specifications

|   |  |
|---|--|
| FCC 47 CFR Part 15, Subpart C – §15.247 | Operation within the bands 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz   |
| IC RSS-247 Issue 2                      | Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices |

### 1.2 Test methods

|   |   |
|---|---|
| ANSI C63.10-2013<br>558074 D01 DTS Measurement Guidance<br>v05r02 (April 2, 2019) | American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices<br>Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 |
|---|---|

### 1.3 Exclusions

None.

### 1.4 Statement of compliance

Testing was performed against all relevant requirements of the test standard(s).

Results obtained indicate that the product under test complies in full with the tested requirements.

The test results relate only to the item(s) tested.

See "Section 2 Summary of test results" for full details.

### 1.5 Test report revision history

**Table 1.5-1: Test report revision history**

| Revision #        | Issue Date     | Details of changes made to test report |
|-------------------|----------------|--|
| REP027851-2TRFEMC | March 15, 2023 | Original report issued                 |

## Section 2 Summary of test results

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### 2.1 FCC Part 15, Subpart C, general requirements

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| Part       | Test description          | Verdict                     |
|------------|---------------------------|-----------------------------|
| §15.207(a) | Conducted limits          | Not applicable <sup>1</sup> |
| §15.31(e)  | Variation of power source | Pass                        |
| §15.203    | Antenna requirement       | Pass <sup>2</sup>           |
| §15.215(c) | 20 dB bandwidth           | Pass                        |

Note 1: The EUT is DC powered via battery

Note 2: The antenna is connected to the EU using a non-standard connector

### 2.2 FCC Part 15.247

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| Part               | Test description  | Verdict        |
|--------------------|---|----------------|
| §15.247(a)(1)(i)   | Frequency hopping systems operating in the 902 – 928 MHz band   | Not applicable |
| §15.247(a)(1)(ii)  | Frequency hopping systems operating in the 5725 – 5850 MHz band   | Not applicable |
| §15.247(a)(1)(iii) | Frequency hopping systems operating in the 2400 – 2483.5 MHz band   | Not applicable |
| §15.247(a)(2)      | Minimum 6 dB bandwidth for systems using digital modulation techniques  | Pass           |
| §15.247(b)(1)      | Maximum peak output power of frequency hopping systems operating in the 2400 – 2483.5 MHz band and 5725 – 5850 MHz band         | Not applicable |
| §15.247(b)(2)      | Maximum peak output power of frequency hopping systems operating in the 902 – 928 MHz band                                      | Not applicable |
| §15.247(b)(3)      | Maximum peak output power of systems using digital modulation in the 902 – 928 MHz, 2400 – 2483.5 MHz and 5275 – 5850 MHz bands | Pass           |
| §15.247(b)(4)      | Transmitting antennas of directional gain greater than 6 dBi  | Not applicable |
| §15.247(c)(1)      | Fixed point-to-point operation with directional antenna gains greater than 6 dBi  | Not applicable |
| §15.247(c)(2)      | Transmitters operating in the 2400 – 2483.5 MHz band that emit multiple directional beams                                       | Not applicable |
| §15.247(d)         | Spurious emissions  | Pass           |
| §15.247(e)         | Power spectral density for digitally modulated devices  | Pass           |
| §15.247(f)         | Time of occupancy for hybrid systems  | Not applicable |

## 2.3 IC RSS-247, Issue 2

| Part    | Test description   | Verdict        |
|---------|--|----------------|
| 5.1 (a) | Bandwidth of a frequency hopping channel   | Not applicable |
| 5.1 (b) | Minimum channel spacing for frequency hopping systems                                  | Not applicable |
| 5.1 (c) | Frequency hopping systems operating in the 902–928 MHz band                            | Not applicable |
| 5.1 (d) | Frequency hopping systems operating in the 2400–2483.5 MHz band                        | Not applicable |
| 5.1 (e) | Frequency hopping systems operating in the 5725–5850 MHz band                          | Not applicable |
| 5.2 (a) | Minimum 6 dB bandwidth   | Pass           |
| 5.2 (b) | Maximum power spectral density   | Pass           |
| 5.3 (a) | Digital modulation turned off  | Not applicable |
| 5.3 (b) | Frequency hopping turned off   | Not applicable |
| 5.4 (a) | Frequency hopping systems operating in the 902–928 MHz band                            | Not applicable |
| 5.4 (b) | Frequency hopping systems operating in the 2400–2483.5 MHz band                        | Not applicable |
| 5.4 (c) | Frequency hopping systems operating in the 5725–5850 MHz                               | Not applicable |
| 5.4 (d) | Systems employing digital modulation techniques  | Pass           |
| 5.4 (e) | Point-to-point systems in 2400–2483.5 MHz and 5725–5850 MHz band                       | Not applicable |
| 5.4 (f) | Transmitters which operate in the 2400–2483.5 MHz band with multiple directional beams | Not applicable |
| 5.5     | Out-of-band emissions  | Pass           |

## 2.4 IC RSS-GEN, Issue 5

| Part | Test description   | Verdict                     |
|------|--|-----------------------------|
| 6.7  | 99% Occupied bandwidth   | Pass                        |
| 7.3  | Receiver radiated emission limits  | Not applicable <sup>1</sup> |
| 7.4  | Receiver conducted emission limits                                       | Not applicable <sup>2</sup> |
| 8.8  | Power Line Conducted Emissions Limits for License-Exempt Radio Apparatus | Not applicable <sup>3</sup> |

Note 1: EUT is neither a stand-alone receiver nor a scanning receiver.

Note 2: The EUT is battery powered

## Section 3 Equipment under test (EUT) details

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### 3.1 Disclaimer

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This section contains information provided by the applicant and has been utilized to support the test plan. Inaccurate information provided by the applicant can affect the validity of the results within this test report. Nemko accepts no responsibility for the information contained within this section and the impact it may have on the test plan and resulting measurements.

### 3.2 Sample information

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|                        |           |
|------------------------|-----------|
| Receipt date           | 24-Jan-23 |
| Nemko sample ID number | REP027851 |

### 3.3 Testing period

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|                 |           |
|-----------------|-----------|
| Test start date | 24-Jan-23 |
| Test end date   | 08-Feb-23 |

### 3.4 Applicant

---

|                 |                                     |
|-----------------|-------------------------------------|
| Company name    | TrellisWare Technologies, Inc       |
| Address         | 10641 Scripps Summit Court, Ste 100 |
| City            | San Diego                           |
| State           | California                          |
| Postal/Zip code | 92131                               |
| Country         | United states                       |

### 3.5 Manufacturer

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|                 |                                     |
|-----------------|-------------------------------------|
| Company name    | TrellisWare Technologies, Inc       |
| Address         | 10641 Scripps Summit Court, Ste 100 |
| City            | San Diego                           |
| State           | California                          |
| Postal/Zip code | 92131                               |
| Country         | United states                       |

### 3.6 EUT information

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|                                 |  |
|---------------------------------|--|
| Product name                    | TW-875 Ghost Radio with battery  |
| Model                           | TW-875   |
| Variant(s)                      | TW-870 Embedded Radio (without internal battery)   |
| Serial number                   | TW-875 = SN-133866, TW-870 = SN-152187   |
| Part number                     | TW-875 = ASY0750280, TW-870 = ASY0750279   |
| Power requirements              | TW-875 uses internal battery, TW-870 uses external battery 8-20 VDC  |
| Description/theory of operation | Handheld MANET radio carries voice, location, and user data. User selectable channel bandwidth of 1.2, 3.6, 10, and 20MHz.                         |
| Operational frequencies         | 2403 – 2478 MHz, depending on bandwidth selected   |
| Software details                | Version 6.2.1-b38  |
| Operating band                  | 2400 – 2483.5 MHz  |
| Test frequencies                | 2403 MHz (1.2 MHz), 2404 MHz (3.6 MHz), 2412 MHz (10 MHz), 2422 MHz (20 MHz), 2442 MHz (20 MHz), 2465 MHz (10 MHz), 2478 MHz (3.6 MHz and 1.2 MHz) |
| Modulation type(s)              | TSM HDR  |
| Antenna type                    | Omnidirectional antenna  |
| Operating bandwidth(s)          | 2403 – 2478 MHz, depending on bandwidth selected   |
| Antenna gain (declared)         | 5 dBi  |
| Nominal channel spacing         | 1 MHz  |

### 3.7 EUT exercise and monitoring details

#### EUT description of the methods used to exercise the EUT and all relevant ports:

- Radio is fitted with a 5dBi omni-directional antenna. Channel presets are loaded into the radio to cover low, mid, and high frequencies in the range defined above for all four bandwidth settings. Near-constant transmit mode is enabled using the MAC\_BERT API function of the radio with burst mode settings based on the selected bandwidth.

#### EUT setup/configuration rationale:

- The EUT setup in a configuration that was expected to produce the highest amplitude emissions relative to the limit and that satisfy normal operation/installation practice by the end user.
- The type and construction of cables used in the measurement set-up were consistent with normal or typical use. Cables with mitigation features (for example, screening, tighter/more twists per length, ferrite beads) have been noted below:
  - None
- The EUT was setup in a manner that was consistent with its typical arrangement and use. The measurement arrangement of the EUT, local ancillary equipment and associated cabling was representative of normal practice. Any deviations from typical arrangements have been noted below:
  - None

### 3.8 EUT setup details

**Table 3.8-1: EUT sub assemblies**

| Description | Brand name                   | Model/Part number | Serial number | Rev. |
|-------------|------------------------------|-------------------|---------------|------|
| TW-875      | TSM Ghost Relay with battery | P/N ASY0750280    | SN-133866     | J    |
| TW-870      | TSM Ghost Embedded           | P/N ASY0750279    | SN-152187     | H    |
| TW-1147     | Antenna, 1250-2700MHz, 5dBi  | TW-1147           | None          | A    |

**Table 3.8-2: EUT interface ports**

| Description                                    | Qty. |
|--|------|
| RF Interface = TNC for TW-875, SMA for TW-870  | 1    |
| GPS Interface = SMA                            | 1    |
| Power = 4 pin ODU circular connector           | 1    |
| Voice and Data = 12 pin ODU circular connector | 1    |

**Table 3.8-3: Support equipment**

| Description                   | Brand name | Model/Part number | Serial number | Rev. |
|-------------------------------|------------|-------------------|---------------|------|
| Test Laptop                   | Dell       | Latitude 7430     | None          | None |
| 12V marine battery for TW-870 | Interstate | Model 14          | None          | None |

**Table 3.8-4: Inter-connection cables**

| Cable description                                   | From             | To  | Length (m) |
|---|------------------|-----|------------|
| USB to 12 pin ODU connector                         | Control computer | DUT | 1          |
| Banana to 4-pin ODU connector power for TW-870 only | 12V battery      | DUT | 1          |

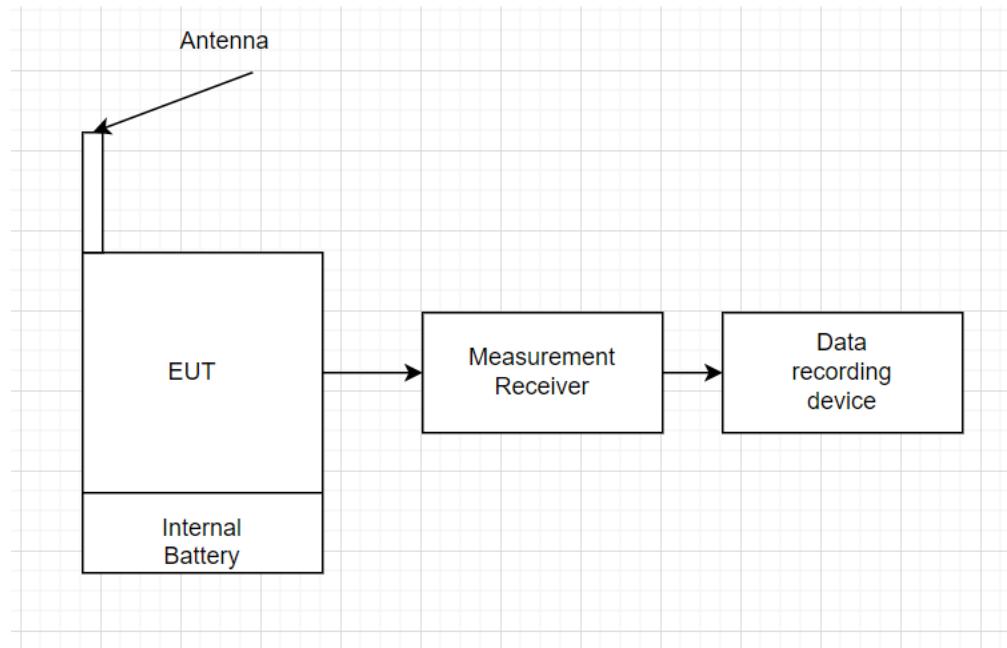


Figure 3.8-1: Test setup diagram

## **Section 4 Engineering considerations**

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### **4.1 Modifications incorporated in the EUT**

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None.

### **4.2 Technical judgement**

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None.

### **4.3 Deviations from laboratory test procedures**

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None.

## Section 5 Test conditions

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### 5.1 Atmospheric conditions

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|                   |            |
|-------------------|------------|
| Temperature       | 15–30 °C   |
| Relative humidity | 20–75 %    |
| Air pressure      | 86–106 kPa |

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

### 5.2 Power supply range

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The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages  $\pm 5\%$ , for which the equipment was designed.

## Section 6 Measurement uncertainty

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### 6.1 Uncertainty of measurement

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Nemko USA Inc. has calculated measurement uncertainty and is documented in EMC/MUC/001 "Uncertainty in EMC measurements." Measurement uncertainty was calculated using the methods described in CISPR 16-4-2 Specification for radio disturbance and immunity measuring apparatus and methods – Part 4-2: Uncertainties, statistics, and limit modelling – Measurement instrumentation uncertainty. The expression of Uncertainty in EMC testing. Measurement uncertainty calculations assume a coverage factor of K=2 with 95% certainty.

**Table 6.1-1: Measurement uncertainty calculations**

| Measurement  |                   | $U_{cispr}$ dB | $U_{lab}$ dB |
|--|-------------------|----------------|--------------|
| Conducted disturbance at AC mains and other port power using a V-AMN | 9 kHz to 150 kHz  | 3.8            | 2.9          |
|  | 150 kHz to 30 MHz | 3.4            | 2.3          |
| Conducted disturbance at telecommunication port using AAN            | 150 kHz to 30 MHz | 5.0            | 4.3          |
| Conducted disturbance at telecommunication port using CVP            | 150 kHz to 30 MHz | 3.9            | 2.9          |
| Conducted disturbance at telecommunication port using CP             | 150 kHz to 30 MHz | 2.9            | 1.4          |
| Conducted disturbance at telecommunication port using CP and CVP     | 150 kHz to 30 MHz | 4.0            | 3.1          |
| Radiated disturbance (electric field strength in a SAC)              | 30 MHz to 1 GHz   | 6.3            | 5.5          |
| Radiated disturbance (electric field strength in a FAR)              | 1 GHz to 6 GHz    | 5.2            | 4.7          |
| Radiated disturbance (electric field strength in a FAR)              | 6 GHz to 18 GHz   | 5.5            | 5.0          |

Notes: Compliance assessment:

If  $U_{lab}$  is less than or equal to  $U_{cispr}$  then:

- compliance is deemed to occur if no measured disturbance level exceeds the disturbance limit;
- non-compliance is deemed to occur if any measured disturbance level exceeds the disturbance limit

If  $U_{lab}$  is greater than  $U_{cispr}$  then:

- compliance is deemed to occur if no measured disturbance level, increased by  $(U_{lab} - U_{cispr})$ , exceeds the disturbance limit;
- non-compliance is deemed to occur if any measured disturbance level, increased by  $(U_{lab} - U_{cispr})$ , exceeds the disturbance limit

V-AMN: V type artificial mains network  
AAN: Asymmetric artificial network  
CP: Current probe  
CVP: Capacitive voltage probe  
SAC: Semi-anechoic chamber  
FAR: Fully anechoic room

## Section 7 Test equipment

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### 7.1 Test equipment list

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**Table 7.1-1: Test equipment list**

| Equipment                   | Manufacturer    | Model no.      | Asset no.     | Cal cycle | Next cal.  |
|-----------------------------|-----------------|----------------|---------------|-----------|------------|
| EMI Test Receiver           | Rohde & Schwarz | ESCI 7         | E1026         | 1 year    | 03/22/2023 |
| Standard Gain Horn Antenna  | Eravant         | SAZ-2410-42-S1 | EW107         | 2 years   | 11/22/2023 |
| Signal & Spectrum Analyzer  | Rohde & Schwarz | FSW43          | E1302         | 1 year    | 10/20/2023 |
| 20 dB attenuator            | Centric RF      | C407-20        | E1201         | NCR       | NCR        |
| 10 dB attenuator            | Centric RF      | C407-10        | E1198         | NCR       | NCR        |
| Transient Limiter           | Hewlett-Packard | 11947A         | E1159         | 1 year    | 02/18/2023 |
| Two Line V-Network          | Rohde & Schwarz | ENV216         | E1019         | 1 year    | 09/30/2023 |
| EMI Test Receiver           | Rohde & Schwarz | ESU40          | E1121         | 1 year    | 05/31/2023 |
| System Controller           | Sunol Sciences  | SC104V         | E1129         | NCR       | NCR        |
| Bilog Antenna               | Schaffner       | CBL 6111D      | 1763          | 2 years   | 04/01/2024 |
| DRG Horn                    | ETS-Lindgren    | 3117-PA        | E1139         | 2 years   | 04/19/2023 |
| Pre-Amp as part of DRG Horn | ETS-Lindgren    | 3117-PA        | Part of E1139 | 2 years   | 04/19/2023 |

Notes:  
 N/A – not applicable  
 NCR – no calibration required  
 VOU – verify on use

**Table 7.1-2: Test software details**

| Manufacturer of Software | Details                                   |
|--------------------------|---|
| Rohde & Schwarz          | EMC 32 V10.60.15 (Radiated emissions)     |
| Rohde & Schwarz          | EMC 32 V10.20.01 (AC conducted emissions) |

Notes: None

## Section 8 Testing data

### 8.1 Minimum 6 dB bandwidth for systems using digital modulation techniques

#### 8.1.1 References and limits

- FCC 47 CFR Part 15, Subpart B: §15.247(a)(2)
- RSS-247: §5.2(a)
- Test method: 558074 D01 DTS Measurement Guidance §8.2 and ANSI C63.10 §11.8.2 (using built-in marker function of the spectrum analyzer)

§15.247:

- (a) Operation under the provisions of this Section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:  
(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:

- 5.2 DTSS include systems that employ digital modulation techniques resulting in spectral characteristics similar to direct sequence systems. The following applies to the bands 902-928 MHz and 2400-2483.5 MHz:  
(a) The minimum 6 dB bandwidth shall be 500 kHz.

#### 8.1.2 Test summary

|               |   |                   |            |
|---------------|---|-------------------|------------|
| Verdict       | Pass  |                   |            |
| Test date     | February 6, 2023  | Temperature       | 19.77 °C   |
| Test engineer | Chenhao Ma, Wireless Test Technician  | Air pressure      | 997.1 mbar |
| Test location | <input checked="" type="checkbox"/> Wireless bench<br><input type="checkbox"/> Other: | Relative humidity | 44.1 %     |

#### 8.1.3 Notes

Testing was performed with the transmitter operating on a fixed channel at full power. Low, middle and high channels were tested.  
Because of high power, use 10dBm attenuate.

#### 8.1.4 Setup details

|                             |   |
|-----------------------------|---|
| EUT power input during test | 12 VDC  |
| EUT setup configuration     | <input checked="" type="checkbox"/> Table-top<br><input type="checkbox"/> Floor standing<br><input type="checkbox"/> Other: |

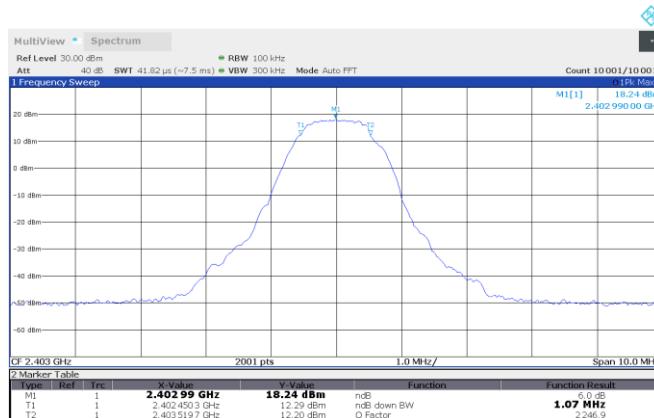
Receiver settings:

|                      |                                    |
|----------------------|------------------------------------|
| Resolution bandwidth | 100 kHz                            |
| Video bandwidth      | 300 kHz                            |
| Detector mode        | Peak                               |
| Trace mode           | Max Hold                           |
| Measurement time     | Long enough for trace to stabilize |

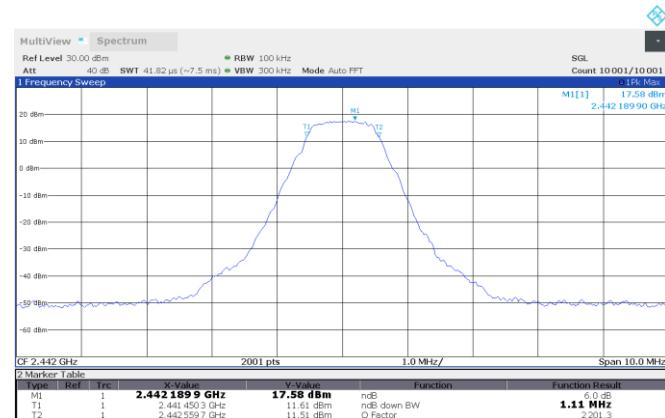
### 8.1.5 Test data

**Table 8.1-1: TSM Bandwidth 1.2MHz 6dB DTS bandwidth test data**

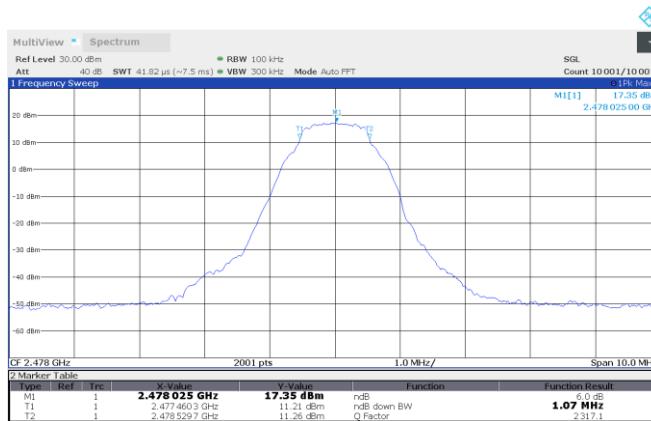
| Test frequency (MHz) | Bandwidth (kHz) | Limit     |
|----------------------|-----------------|-----------|
| 2403                 | 1070            | ≥ 500 kHz |
| 2442                 | 1110            | ≥ 500 kHz |
| 2478                 | 1070            | ≥ 500 kHz |



**Figure 8.1-1: TSM Bandwidth 1.2MHz 6dB DTS bandwidth, 2403 MHz**



**Figure 8.1-2: TSM Bandwidth 1.2MHz 6dB DTS bandwidth, 2442 MHz**



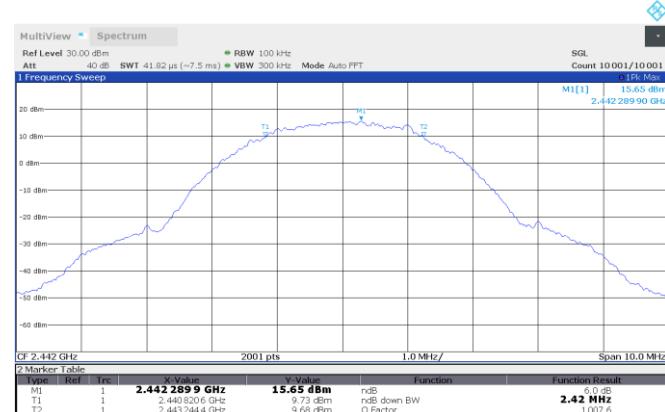
**Figure 8.1-3: TSM Bandwidth 1.2MHz 6dB DTS bandwidth, 2478 MHz**

**Table 8.1-2: TSM Bandwidth 3.6MHz 6dB DTS bandwidth test data**

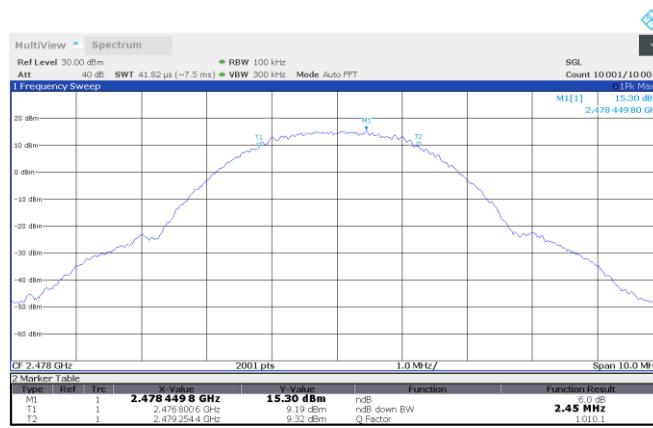
| Test frequency (MHz) | Bandwidth (kHz) | Limit     |
|----------------------|-----------------|-----------|
| 2404                 | 2300            | ≥ 500 kHz |
| 2442                 | 2420            | ≥ 500 kHz |
| 2478                 | 2450            | ≥ 500 kHz |



**Figure 8.1-4: TSM Bandwidth 3.6MHz 6dB DTS bandwidth, 2404 MHz**



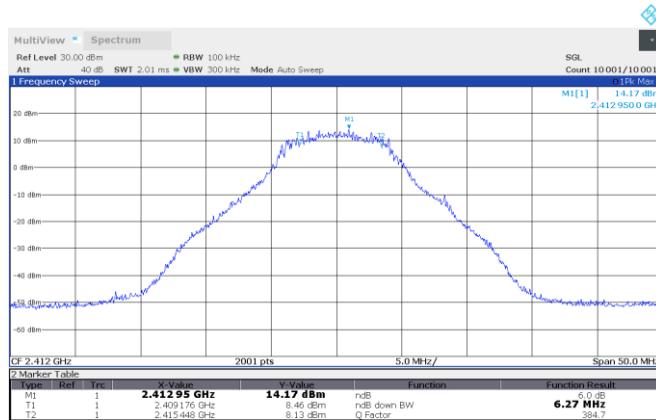
**Figure 8.1-5: TSM Bandwidth 3.6MHz 6dB DTS bandwidth, 2442 MHz**



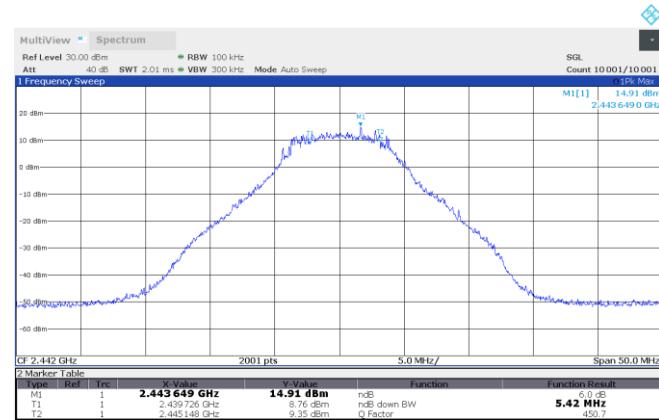
**Figure 8.1-6: TSM Bandwidth 3.6MHz 6dB DTS bandwidth, 2478 MHz**

**Table 8.1-3: TSM Bandwidth 10MHz 6dB DTS bandwidth test data**

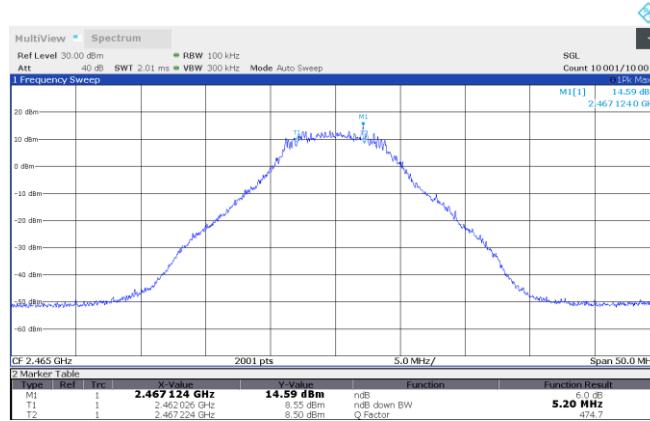
| Test frequency (MHz) | Bandwidth (kHz) | Limit     |
|----------------------|-----------------|-----------|
| 2412                 | 6270            | ≥ 500 kHz |
| 2442                 | 5420            | ≥ 500 kHz |
| 2465                 | 5200            | ≥ 500 kHz |



**Figure 8.1-7: TSM Bandwidth 10MHz 6dB DTS bandwidth, 2412 MHz**



**Figure 8.1-8: TSM Bandwidth 10MHz 6dB DTS bandwidth, 2442 MHz**



**Figure 8.1-9: TSM Bandwidth 10MHz 6dB DTS bandwidth, 2465 MHz**

**Table 8.1-4:** TSM Bandwidth 20MHz 6dB DTS bandwidth test data

| Test frequency (MHz) | Bandwidth (kHz) | Limit          |
|----------------------|-----------------|----------------|
| 2422                 | 18590           | $\geq 500$ kHz |
| 2442                 | 17966           | $\geq 500$ kHz |

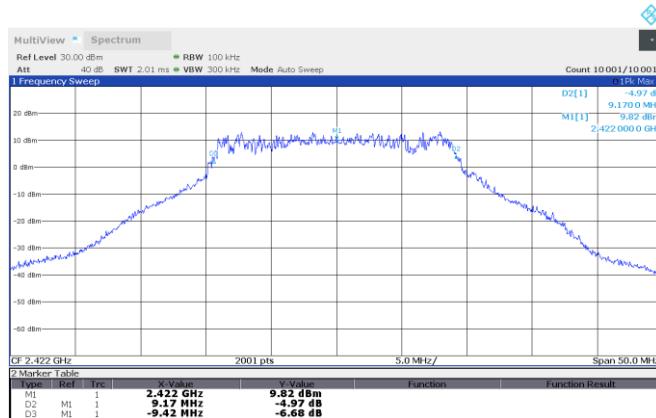


Figure 8.1-10: TSM Bandwidth 20MHz 6dB DTS bandwidth, 2412 MHz

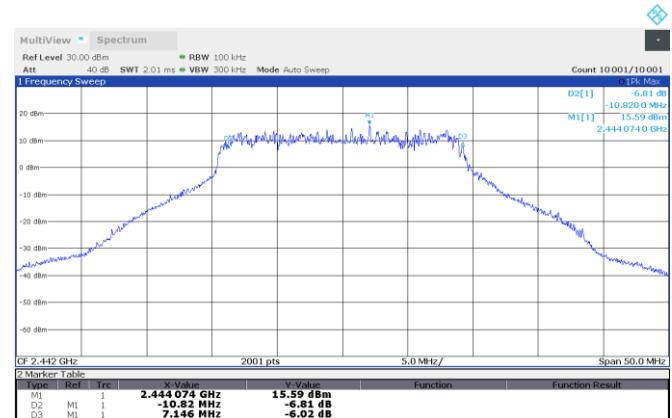


Figure 8.1-11: TSM Bandwidth 20MHz 6dB DTS bandwidth, 2442 MHz

**Table 8.1-5:** HDR-Bandwidth 20MHz 6dB DTS bandwidth test data

| Test frequency (MHz) | Bandwidth (kHz) | Limit          |
|----------------------|-----------------|----------------|
| 2422                 | 17920           | $\geq 500$ kHz |
| 2442                 | 18070           | $\geq 500$ kHz |

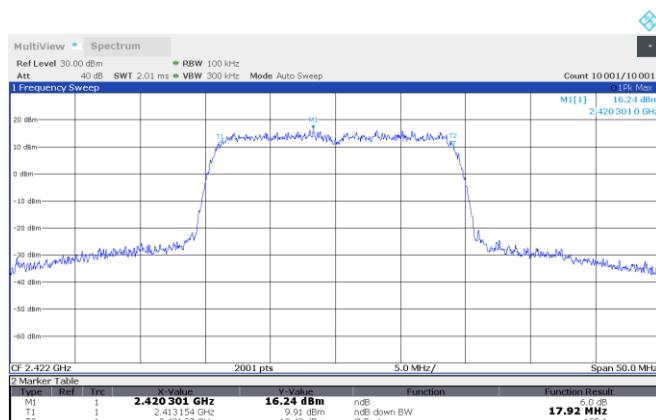


Figure 8.1-12: HDR Bandwidth 20MHz 6dB DTS bandwidth, 2422 MHz

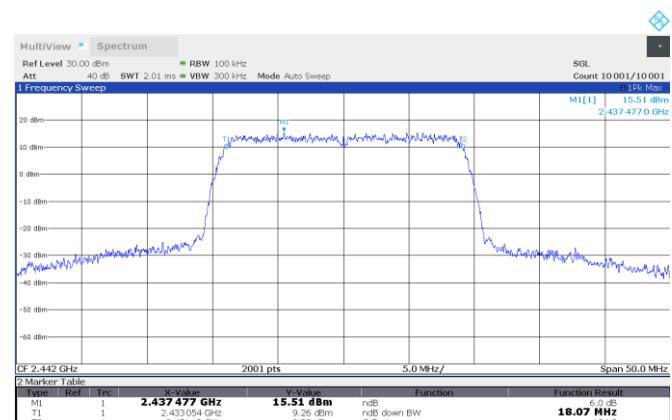


Figure 8.1-13: HDR Bandwidth 20MHz 6dB DTS bandwidth, 2442 MHz

## 8.2 Transmitter output power and EIRP requirements

### 8.2.1 References and limits

- FCC 47 CFR Part 15, Subpart B: §15.247(b)(3)
- RSS-247: §5.4(d)
- Test method: ANSI C63.10 §11.9.2.2.2 (Method AVGSA-1)
- Test method: ANSI C63.10 §11.9.2.2.6 (Method AVGSA-3)

#### §15.247:

(b) Operation under the provisions of this Section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

(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:

5.4 Devices shall comply with the following requirements, where applicable:

(d) For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The EIRP shall not exceed 4 W, except as provided in RSS 247 section 5.4(e).

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

### 8.2.2 Test summary

|               |   |                   |             |
|---------------|---|-------------------|-------------|
| Verdict       | Pass  |                   |             |
| Test date     | February 8, 2023  | Temperature       | 19.74 °C    |
| Test engineer | Chenhai Ma, Wireless Test Technician  | Air pressure      | 1002.4 mbar |
| Test location | <input checked="" type="checkbox"/> Wireless bench<br><input type="checkbox"/> Other: | Relative humidity | 39.98 %     |

### 8.2.3 Notes

Testing was performed with the transmitter operating on a fixed channel at full power. Low, middle and high channels were tested. EIRP = conducted power + declared antenna gain.

Use method AVGSA-3 for testing.

### 8.2.4 Setup details

|                             |   |
|-----------------------------|---|
| EUT power input during test | 12 VDC  |
| EUT setup configuration     | <input checked="" type="checkbox"/> Table-top<br><input type="checkbox"/> Floor standing<br><input type="checkbox"/> Other: |

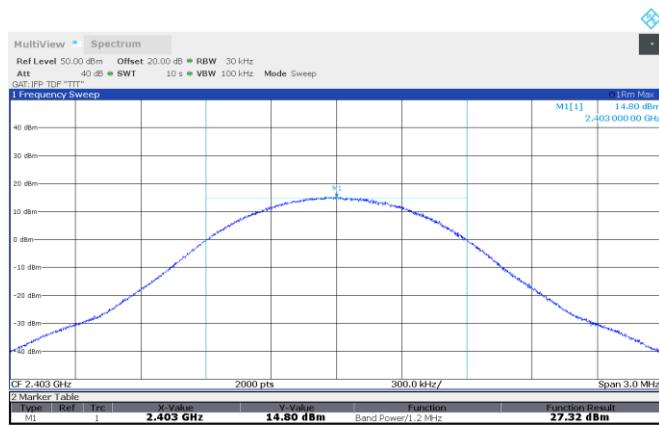
#### Receiver settings:

|                      |                                    |
|----------------------|------------------------------------|
| Resolution bandwidth | See plots                          |
| Video bandwidth      | See plots                          |
| Detector mode        | RMS                                |
| Trace mode           | Max Hold                           |
| Measurement time     | Long enough for trace to stabilize |

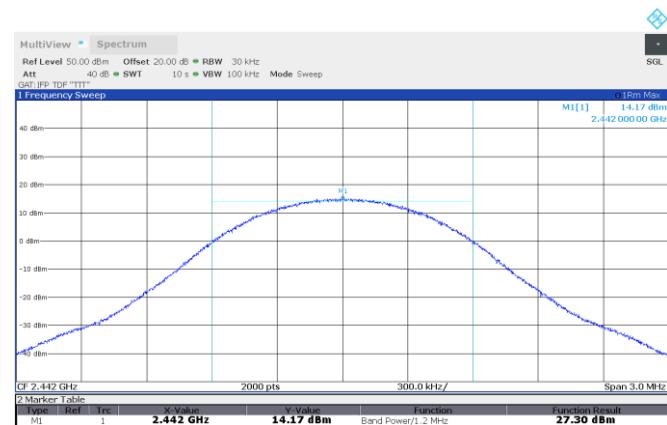
## 8.2.5 Test data

**Table 8.2-1: TSM-Bandwidth 1.2MHz Transmitter output power and EIRP test data**

| Test frequency (MHz) | Peak conducted output power (dBm) | Conducted limit (dBm) | Antenna Gain (declared) (dBi) | EIRP (dBm) | EIRP limit (dBm) |
|----------------------|-----------------------------------|-----------------------|-------------------------------|------------|------------------|
| 2403                 | 27.32                             | 30.0                  | 5                             | 32.32      | 36.0             |
| 2442                 | 27.30                             | 30.0                  | 5                             | 32.30      | 36.0             |
| 2478                 | 26.97                             | 30.0                  | 5                             | 31.97      | 36.0             |



**Figure 8.2-1: TSM-Bandwidth 1.2MHz Conducted output power, 2403 MHz**



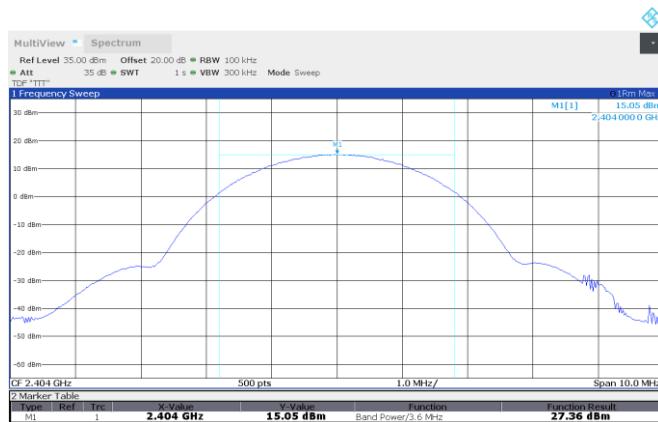
**Figure 8.2-2: TSM-Bandwidth 1.2MHz Conducted output power, 2442 MHz**



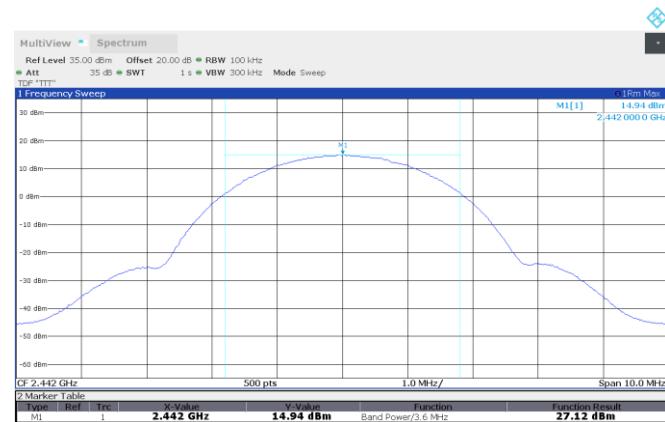
**Figure 8.2-3: TSM-Bandwidth 1.2MHz Conducted output power, 2478 MHz**

**Table 8.2-2: TSM-Bandwidth 3.6MHz Transmitter output power and EIRP test data**

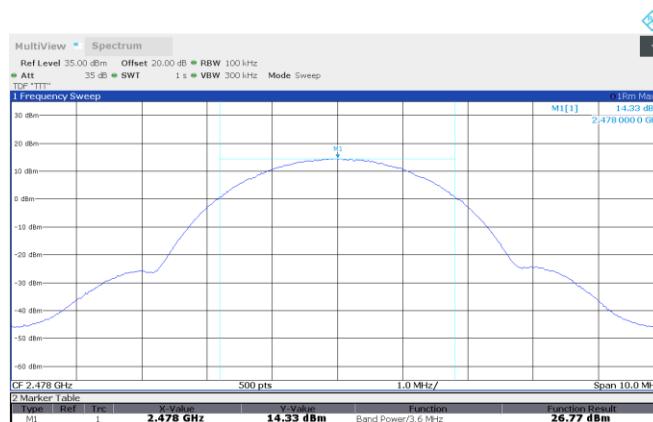
| Test frequency (MHz) | Peak conducted output power (dBm) | Conducted limit (dBm) | Antenna Gain (declared) (dBi) | EIRP (dBm) | EIRP limit (dBm) |
|----------------------|-----------------------------------|-----------------------|-------------------------------|------------|------------------|
| 2404                 | 27.36                             | 30.0                  | 5                             | 32.36      | 36.0             |
| 2442                 | 27.12                             | 30.0                  | 5                             | 32.12      | 36.0             |
| 2478                 | 26.77                             | 30.0                  | 5                             | 31.77      | 36.0             |



**Figure 8.2-4: TSM-Bandwidth 3.6MHz Conducted output power, 2404 MHz**



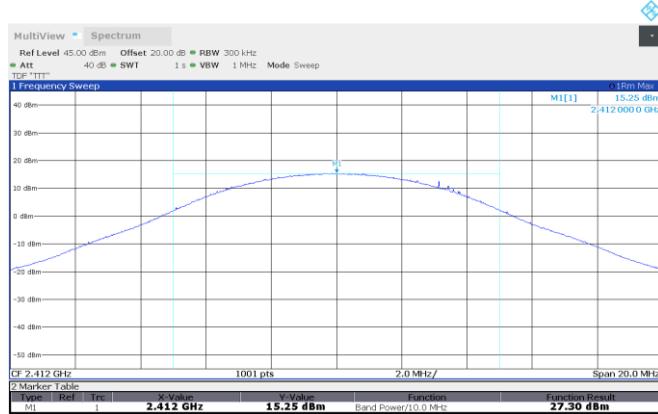
**Figure 8.2-5: TSM-Bandwidth 3.6MHz Conducted output power, 2442 MHz**



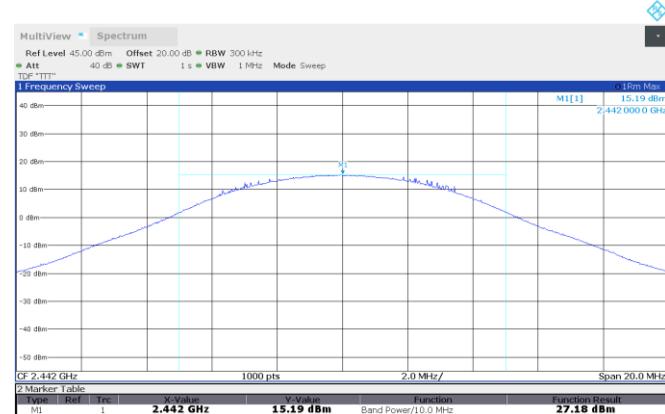
**Figure 8.2-6: TSM-Bandwidth 3.6MHz Conducted output power, 2478 MHz**

**Table 8.2-3: TSM-Bandwidth 10MHz Transmitter output power and EIRP test data**

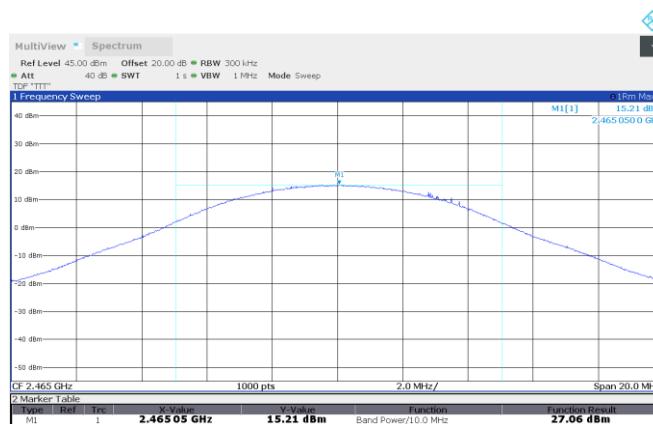
| Test frequency (MHz) | Peak conducted output power (dBm) | Conducted limit (dBm) | Antenna Gain (declared) (dBi) | EIRP (dBm) | EIRP limit (dBm) |
|----------------------|-----------------------------------|-----------------------|-------------------------------|------------|------------------|
| 2412                 | 27.30                             | 30.0                  | 5                             | 32.30      | 36.0             |
| 2442                 | 27.18                             | 30.0                  | 5                             | 32.18      | 36.0             |
| 2465                 | 27.06                             | 30.0                  | 5                             | 32.06      | 36.0             |



**Figure 8.2-7: TSM-Bandwidth 10MHz Conducted output power, 2412 MHz**



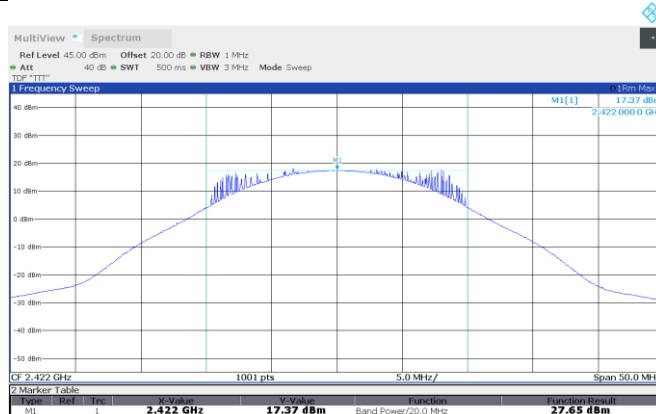
**Figure 8.2-8: TSM-Bandwidth 10MHz Conducted output power, 2442 MHz**



**Figure 8.2-9: TSM-Bandwidth 10MHz Conducted output power, 2465 MHz**

**Table 8.2-4: TSM-Bandwidth 20MHz Transmitter output power and EIRP test data**

| Test frequency (MHz) | Peak conducted output power (dBm) | Conducted limit (dBm) | Antenna Gain (declared) (dBi) | EIRP (dBm) | EIRP limit (dBm) |
|----------------------|-----------------------------------|-----------------------|-------------------------------|------------|------------------|
| 2422                 | 27.65                             | 30.0                  | 5                             | 32.65      | 36.0             |
| 2442                 | 27.92                             | 30.0                  | 5                             | 32.92      | 36.0             |



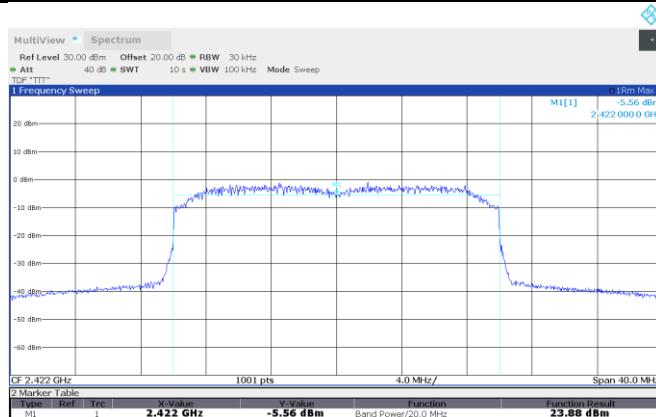
**Figure 8.2-10: TSM-Bandwidth 20MHz Conducted output power, 2422 MHz**



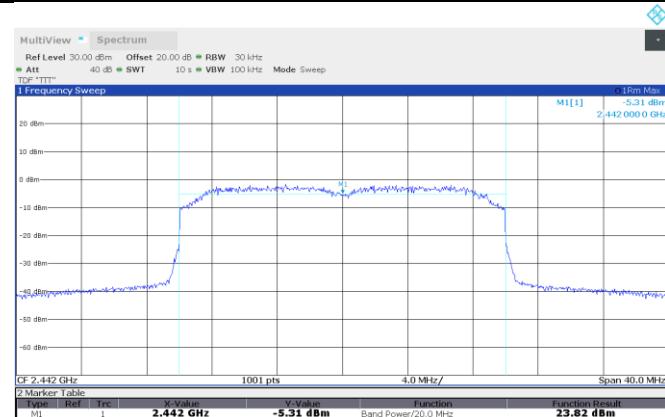
**Figure 8.2-11: TSM-Bandwidth 20MHz Conducted output power, 2442 MHz**

**Table 8.2-5: HDR-Bandwidth 20MHz Transmitter output power and EIRP test data**

| Test frequency (MHz) | Peak conducted output power (dBm) | Conducted limit (dBm) | Antenna Gain (declared) (dBi) | EIRP (dBm) | EIRP limit (dBm) |
|----------------------|-----------------------------------|-----------------------|-------------------------------|------------|------------------|
| 2422                 | 23.88                             | 30.0                  | 5                             | 28.88      | 35.0             |
| 2442                 | 23.83                             | 30.0                  | 5                             | 28.83      | 35.0             |



**Figure 8.2-12: HDR-Bandwidth 20MHz Conducted output power, 2422 MHz**



**Figure 8.2-13: HDR-Bandwidth 20MHz Conducted output power, 2442 MHz**

## 8.3 Spurious emissions

### 8.3.1 References and limits

- FCC 47 CFR Part 15, Subpart B: §15.247(d)
- RSS-247: §5.5
- Test method: ANSI C63.10-2014 §6.10.4 (authorized band edge)
- Test method: ANSI C63.10-2014 §6.7 (antenna port conducted spurious emissions)
- Test method: ANSI C63.10-2014 §11.13 (radiated restricted band edge)
- Test method: ANSI C63.10-2014 §6.5, 6.6 (radiated emissions in restricted bands)

#### §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:

- 5.4 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.

**Table 8.3-1: FCC §15.209—Radiated emission limits**

| Frequency,<br>MHz | Field strength of emissions |                                   | Measurement distance, m |
|-------------------|-----------------------------|-----------------------------------|-------------------------|
|                   | µV/m                        | dBµV/m                            |                         |
| 0.009–0.490       | 2400/F                      | 67.6 – 20 × log <sub>10</sub> (F) | 300                     |
| 0.490–1.705       | 24000/F                     | 87.6 – 20 × log <sub>10</sub> (F) | 30                      |
| 1.705–30.0        | 30                          | 29.5                              | 30                      |
| 30–88             | 100                         | 40.0                              | 3                       |
| 88–216            | 150                         | 43.5                              | 3                       |
| 216–960           | 200                         | 46.0                              | 3                       |
| above 960         | 500                         | 54.0                              | 3                       |

Notes: In the emission table above, the tighter limit applies at the band edges.

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test.

**Table 8.3-2: FCC restricted frequency bands**

| MHz               | MHz                 | MHz           | GHz         |
|-------------------|---------------------|---------------|-------------|
| 0.090–0.110       | 16.42–16.423        | 399.9–410     | 4.5–5.15    |
| 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     | Above 38.6  |
| 13.36–13.41       |                     |               |             |

### 8.3.2 Test summary

|               |   |                   |            |
|---------------|---|-------------------|------------|
| Verdict       | Pass  |                   |            |
| Test date     | February 6, 2023  | Temperature       | 19.77 °C   |
| Test engineer | Chenhai Ma, Wireless Test Technician  | Air pressure      | 997.1 mbar |
| Test location | <input checked="" type="checkbox"/> Wireless bench<br><input type="checkbox"/> 10 m semi-anechoic chamber<br><input checked="" type="checkbox"/> 3 m semi-anechoic chamber<br><input type="checkbox"/> Other: | Relative humidity | 44.1 %     |

### 8.3.3 Notes

Testing was performed with the transmitter operating on a fixed channel at full power. Low, middle and high channels were tested. The spectrum was searched from 30 MHz to 26 GHz (above the 10<sup>th</sup> harmonic of the highest transmit frequency).

For radiated measurements, the EUT was investigated to identify the worst case orientation with respect to the fundamental transmitter power. All measurements were performed with the EUT in that worst-case orientation. All operating modes were assessed with only data for only the worst case bandwidth (3.6 MHz) presented below.

**NOTE:** Since transmitter output power and power spectral density were measured using average detector methods, the required attenuation of spurious emissions below the highest in-band power in 100 kHz bandwidth is 30 dB. The spectral plots below illustrate a line at 20 dB however there is sufficient margin to see that no emissions exceed the 30 dB attenuation requirement.

### 8.3.4 Setup details

|                             |   |
|-----------------------------|---|
| EUT power input during test | 12 VDC  |
| EUT setup configuration     | <input checked="" type="checkbox"/> Table-top<br><input type="checkbox"/> Floor standing<br><input type="checkbox"/> Other: |

Spectrum analyzer settings (conducted emissions):

|                      |                                    |
|----------------------|------------------------------------|
| Resolution bandwidth | 100 kHz                            |
| Video bandwidth      | 300 kHz                            |
| Detector mode        | Peak                               |
| Trace mode           | Max Hold                           |
| Measurement time     | Long enough for trace to stabilize |

Receiver settings for radiated measurements within restricted bands below 1 GHz:

|                      |  |
|----------------------|--|
| Resolution bandwidth | 120 kHz  |
| Video bandwidth      | 300 kHz  |
| Detector mode        | Peak (preview measurements)<br>Quasi-Peak (final measurements) |

Receiver settings for radiated measurements within restricted bands above 1 GHz:

|                      |  |
|----------------------|--|
| Resolution bandwidth | 1 MHz  |
| Video bandwidth      | 3 MHz  |
| Detector mode        | Peak (preview measurements)<br>Peak and average (final measurements) |

### 8.3.5 Test data

#### Authorized band edge conducted emissions

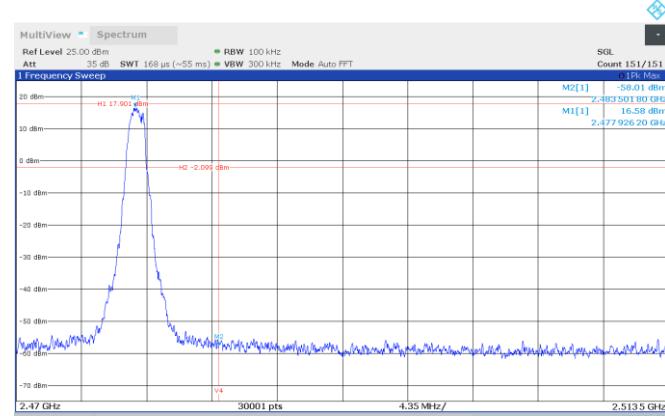
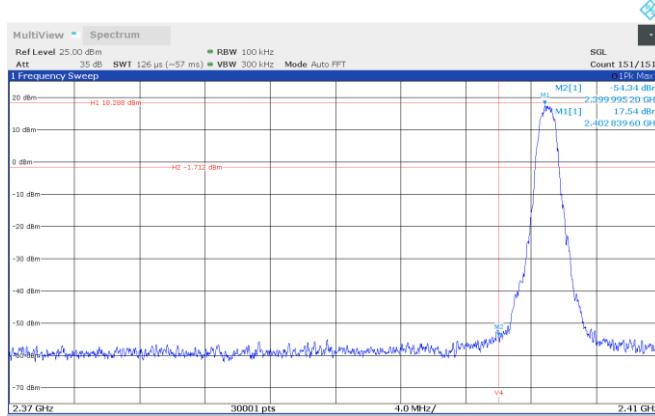


Figure 8.3-1: TSM Bandwidth 1.2MHz Authorized band edge emissions, 2403 MHz

Figure 8.3-2: TSM Bandwidth 1.2MHz Authorized band edge emissions, 2478 MHz

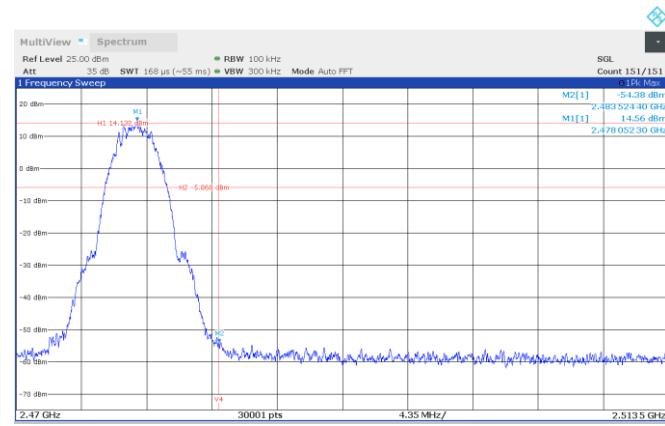
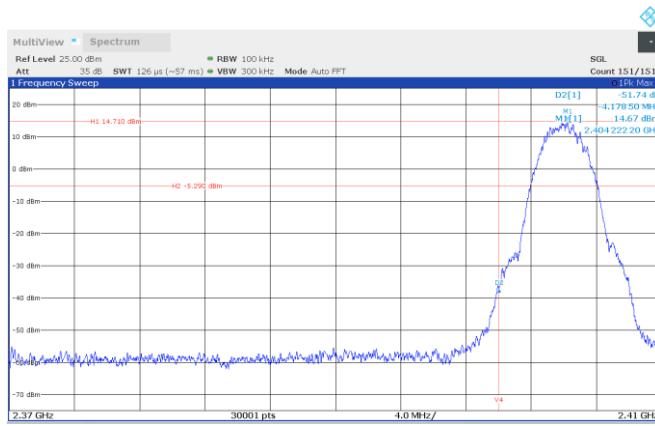


Figure 8.3-3: TSM Bandwidth 3.6MHz Authorized band edge emissions, 2404 MHz

Figure 8.3-4: TSM Bandwidth 3.6MHz Authorized band edge emissions, 2478 MHz

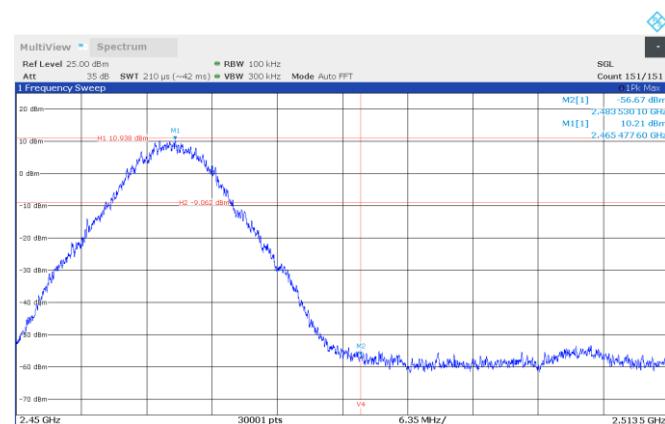
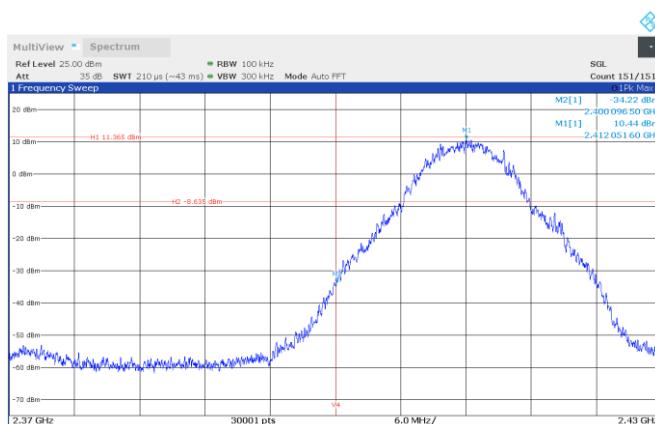
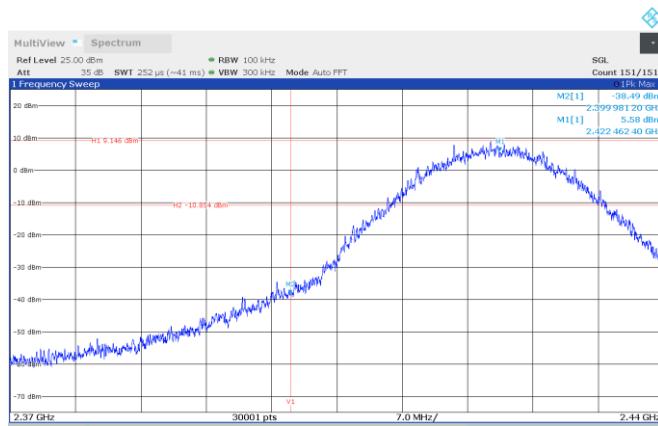
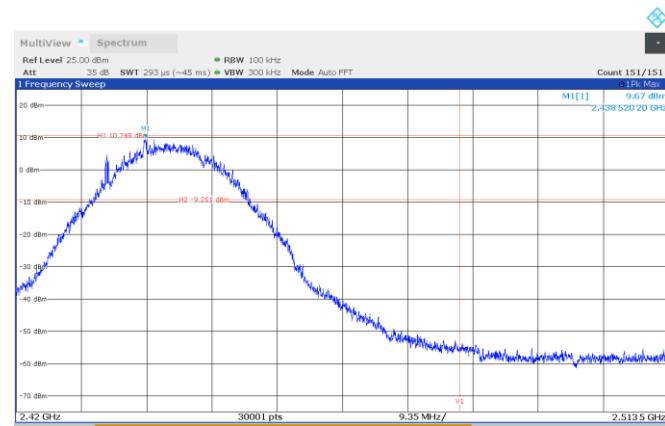


Figure 8.3-5: TSM Bandwidth 10MHz Authorized band edge emissions, 2412MHz

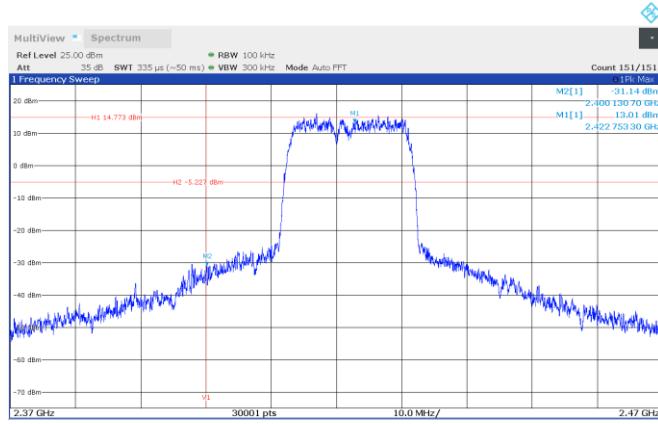
Figure 8.3-6: TSM Bandwidth 10MHz Authorized band edge emissions, 2465MHz



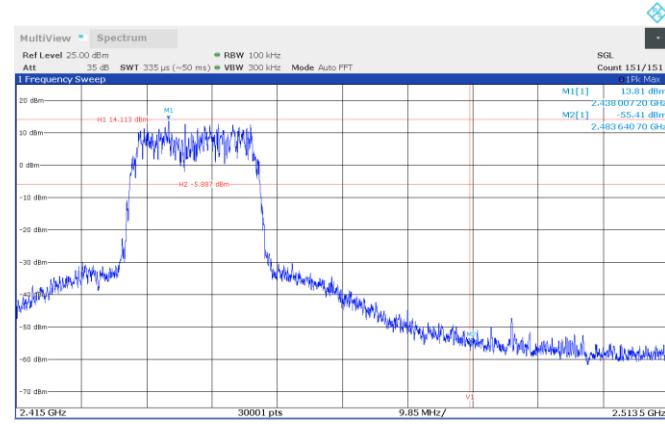
**Figure 8.3-7:** TSM Bandwidth 20MHz Authorized band edge emissions, 2422MHz



**Figure 8.3-8:** TSM Bandwidth 20MHz Authorized band edge emissions, 2442MHz



**Figure 8.3-9:** HDR Bandwidth 20MHz Authorized band edge emissions, 2422MHz



**Figure 8.3-10:** HDR Bandwidth 20MHz Authorized band edge emissions, 2442MHz

**Section 8**  
**Test name**  
**Specification(s)**

**Testing data**  
**Spurious emissions**  
**FCC Part 15 Subpart B and ICES-003 Issue 7**



**Antenna port conducted spurious emissions**

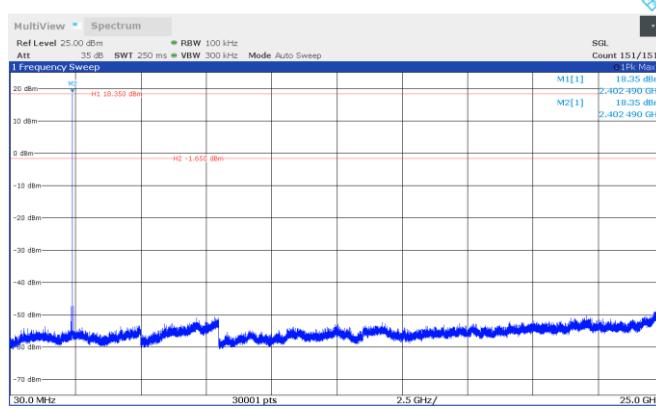


Figure 8.3-11: TSM-Bandwidth 1.2MHz conducted spurious emission, 2403 MHz

Figure 8.3-12: TSM-Bandwidth 1.2MHz conducted spurious emission reference level, 2403 MHz

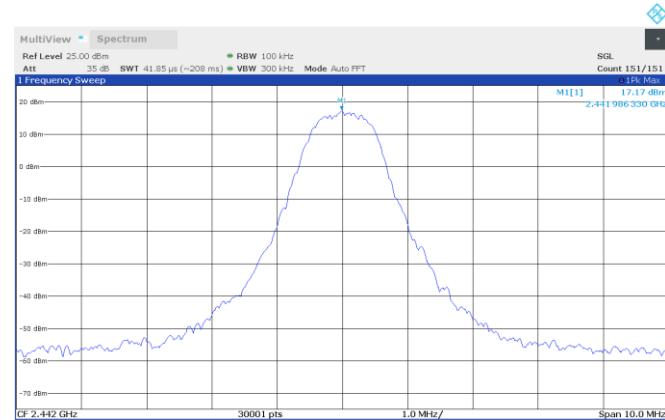
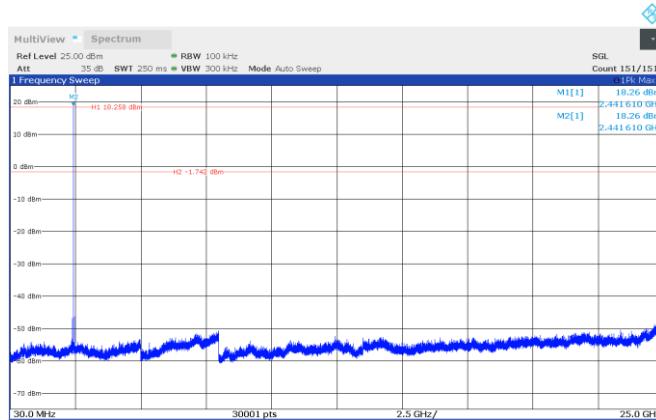


Figure 8.3-13: TSM-Bandwidth 1.2MHz conducted spurious emission, 2442 MHz

Figure 8.3-14: TSM-Bandwidth 1.2MHz conducted spurious emission reference level, 2442 MHz

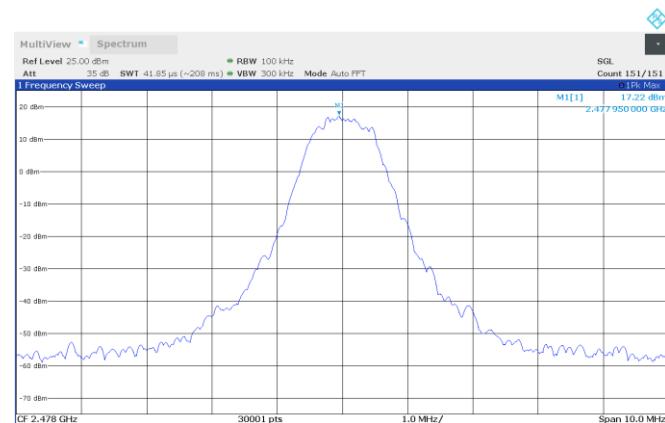
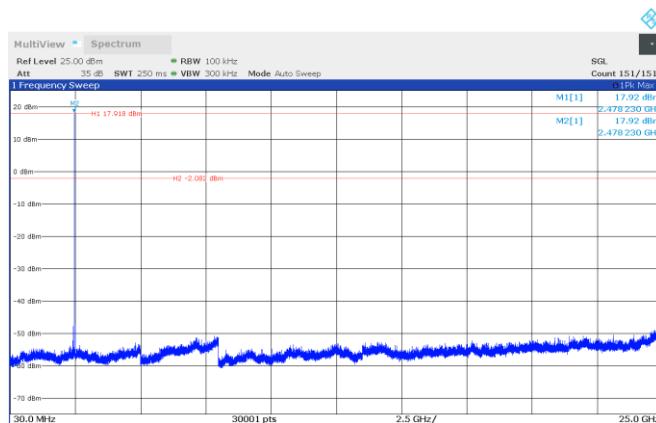
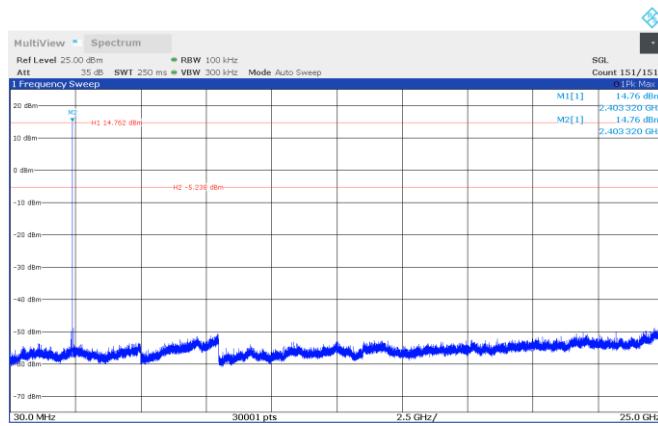


Figure 8.3-15: TSM-Bandwidth 1.2MHz conducted spurious emission, 2478 MHz

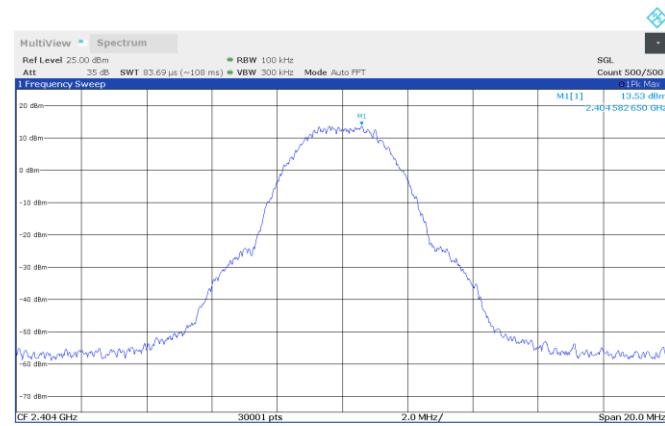
Figure 8.3-16: TSM-Bandwidth 1.2MHz conducted spurious emission reference level, 2478 MHz

**Section 8**  
**Test name**  
**Specification(s)**

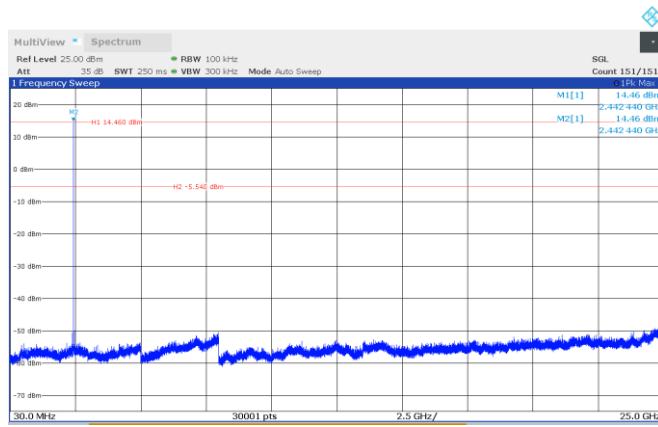
**Testing data**  
**Spurious emissions**  
**FCC Part 15 Subpart B and ICES-003 Issue 7**



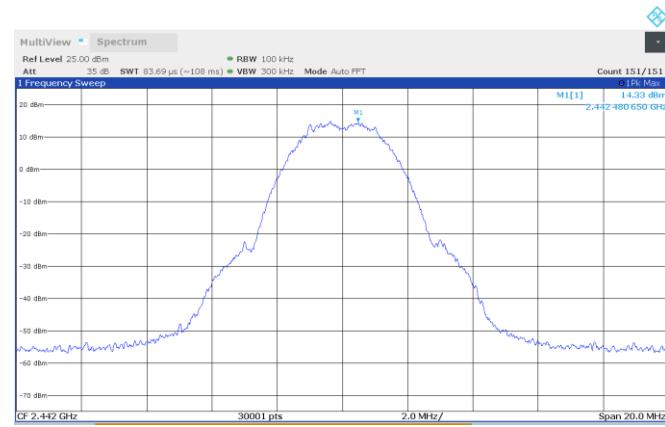
**Figure 8.3-17:** TSM-Bandwidth 3.6MHz conducted spurious emission, 2404 MHz



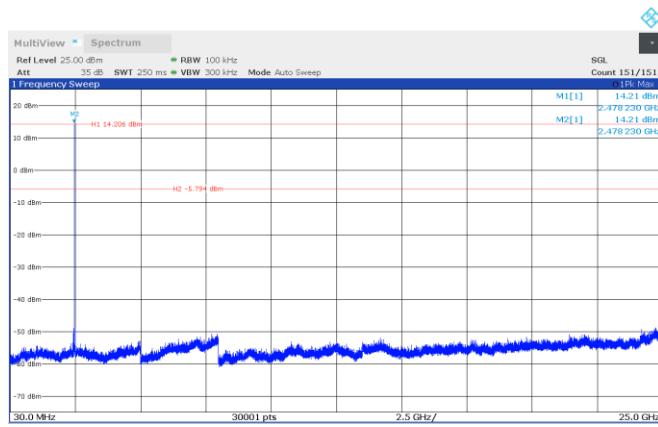
**Figure 8.3-18:** TSM-Bandwidth 3.6MHz conducted spurious emission reference level, 2404 MHz



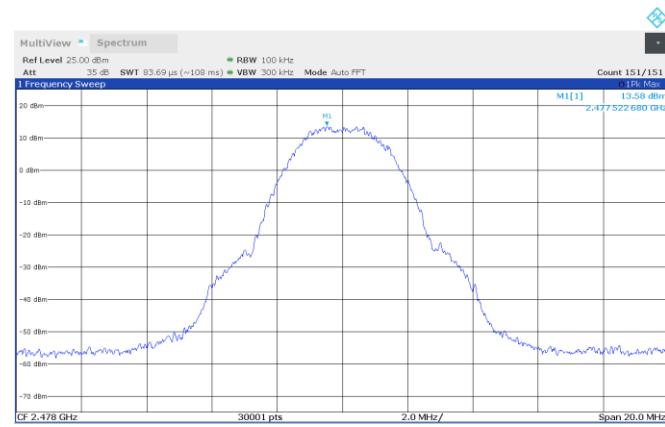
**Figure 8.3-19:** TSM-Bandwidth 3.6MHz conducted spurious emission, 2442 MHz



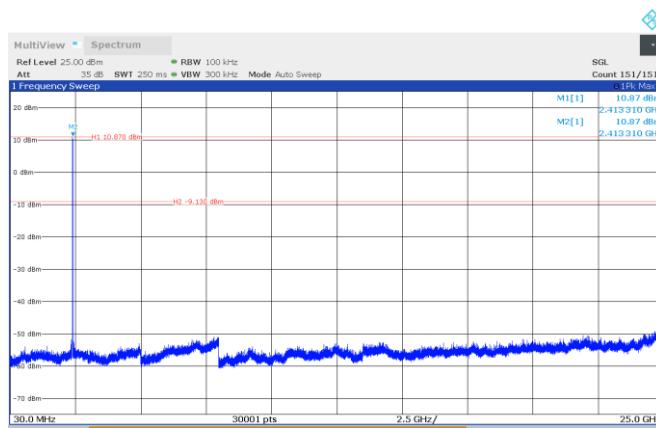
**Figure 8.3-20:** TSM-Bandwidth 3.6MHz conducted spurious emission reference level, 2442 MHz



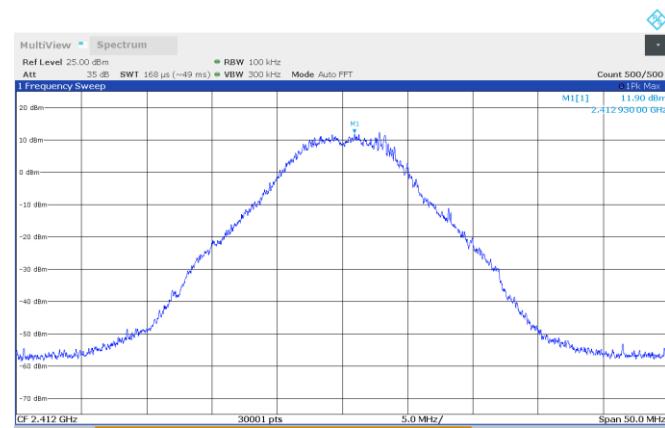
**Figure 8.3-21:** TSM-Bandwidth 3.6MHz conducted spurious emission 2478 MHz



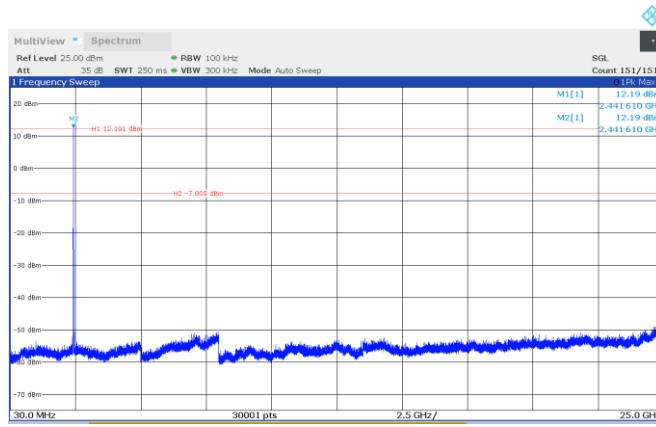
**Figure 8.3-22:** TSM-Bandwidth 3.6MHz conducted spurious emission reference level, 2478 MHz



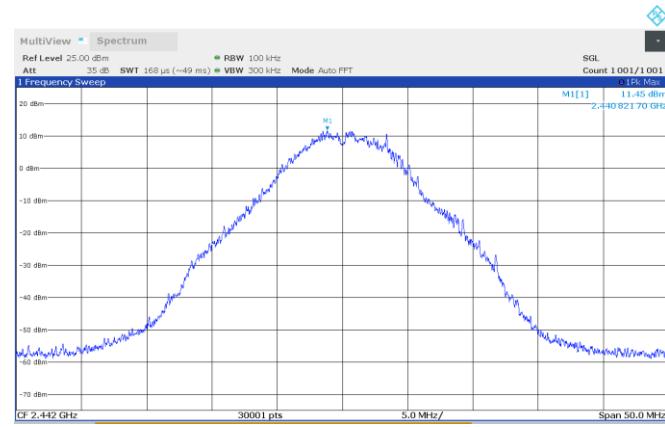
**Figure 8.3-23:** TSM-Bandwidth 10MHz conducted spurious emission, 2412 MHz



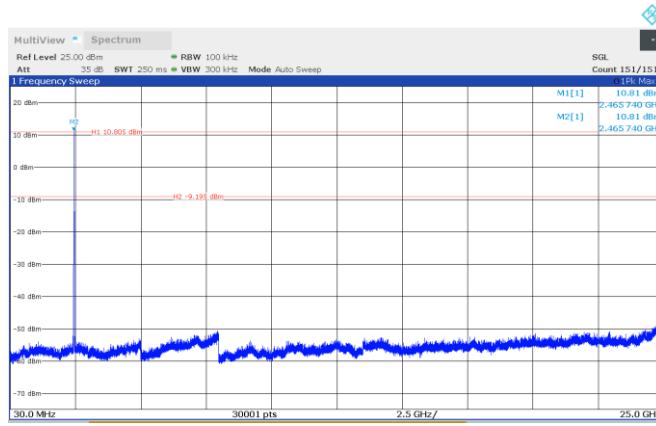
**Figure 8.3-24:** TSM-Bandwidth 10MHz conducted spurious emission reference level, 2412 MHz



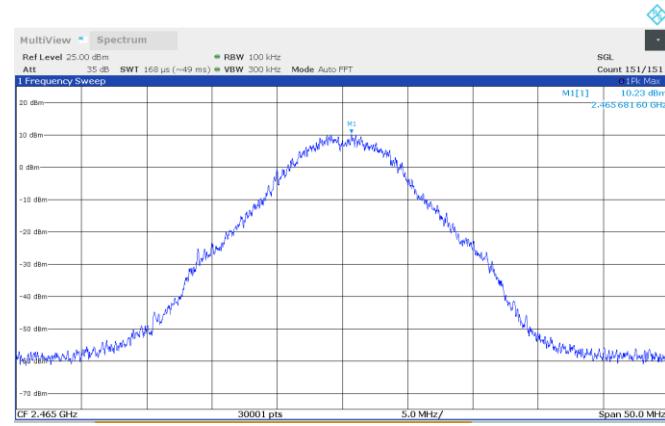
**Figure 8.3-25:** TSM-Bandwidth 10MHz conducted spurious emission, 2442 MHz



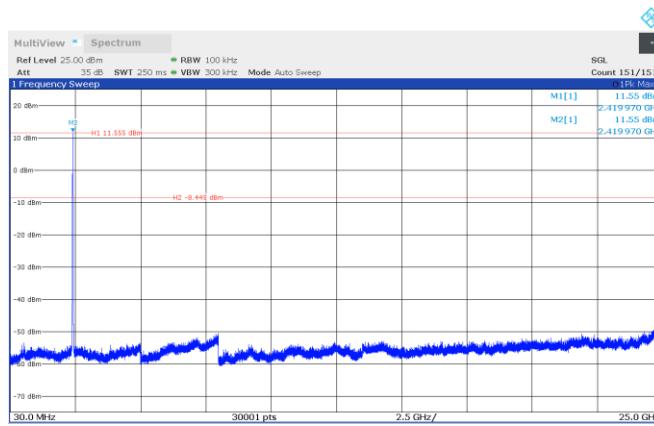
**Figure 8.3-26:** TSM-Bandwidth 10MHz conducted spurious emission reference level, 2442 MHz



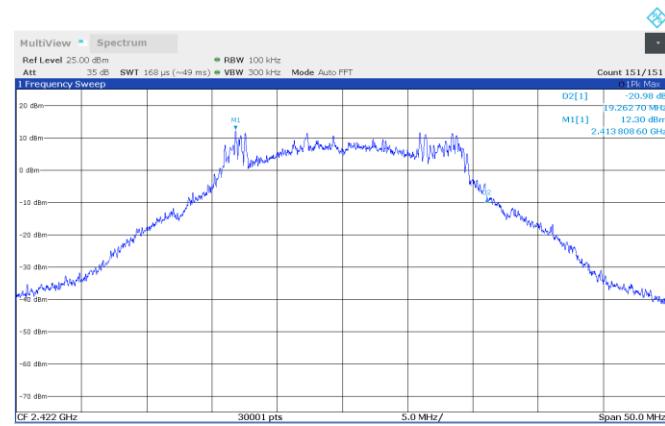
**Figure 8.3-27:** TSM-Bandwidth 10MHz conducted spurious emission, 2465 MHz



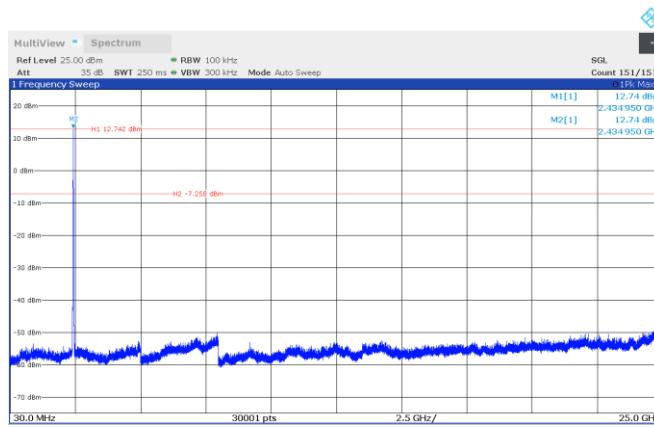
**Figure 8.3-28:** TSM-Bandwidth 10MHz conducted spurious emission reference level, 2465 MHz



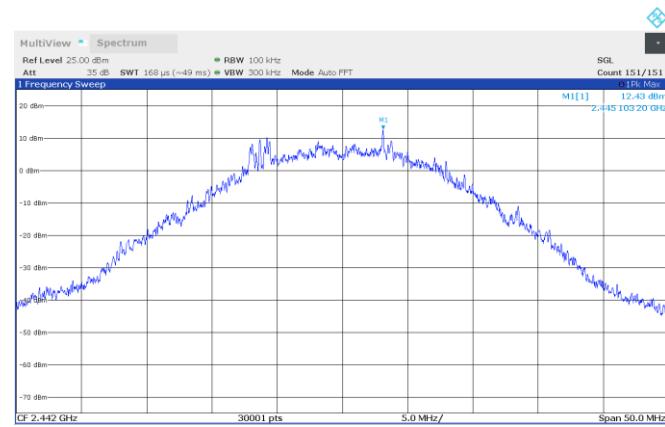
**Figure 8.3-29:** TSM-Bandwidth 20MHz conducted spurious emission, 2422 MHz



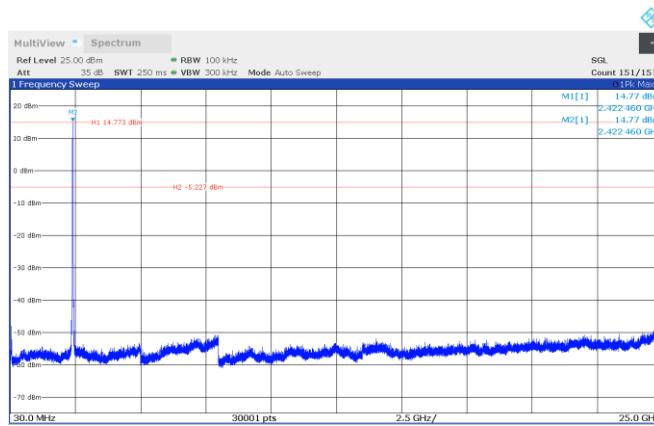
**Figure 8.3-30:** TSM-Bandwidth 20MHz conducted spurious emission reference level, 2422 MHz



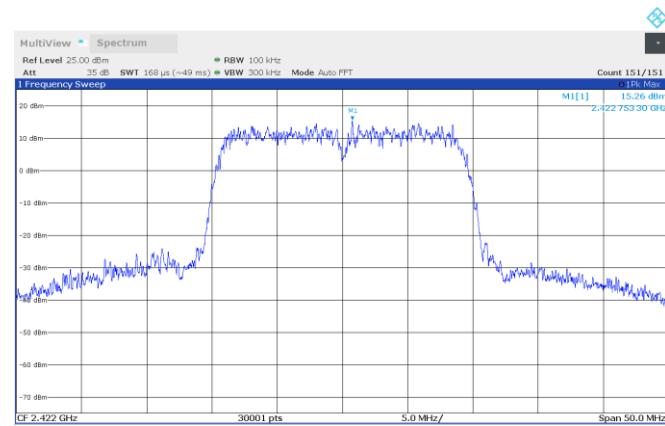
**Figure 8.3-31:** TSM-Bandwidth 20MHz conducted spurious emission, 2442 MHz



**Figure 8.3-32:** TSM-Bandwidth 20MHz conducted spurious emission reference level, 2442 MHz



**Figure 8.3-33:** HDR-Bandwidth 20MHz conducted spurious emission, 2422 MHz



**Figure 8.3-34:** HDR-Bandwidth 20MHz conducted spurious emission reference level, 2422 MHz