

# Test report for

## 47 CFR Part 15 Subpart B

### ICES-Gen, ICES-003

Test report No. : P000270309 001 Ver 1.0



The RvA is signatory to ILAC - MRA



Product name : Fullcloud controller  
Applicant : PinvAccess B.V.  
FCC ID : 2A225-FC2922  
IC : 29825-FC2922

## Laboratory information

### Accreditation

Kiwa Nederland B.V. complies with the accreditation criteria for test laboratories as laid down in ISO/IEC 17025:2017. The accreditation covers the quality system of the laboratory as well as the specific activities as described in the authorized annex bearing the accreditation number L248 and is granted by the Dutch Council For Accreditation (RvA: Raad voor Accreditatie).

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### Testing Location

|                           |                                                                               |
|---------------------------|-------------------------------------------------------------------------------|
| <b>Test Site</b>          | Kiwa Nederland B.V.                                                           |
| <b>Test Site location</b> | Wilmersdorf 50<br>7327 AC Apeldoorn<br>The Netherlands<br>Tel. +31 88998 3393 |
| <b>Test Site FCC</b>      | NL0001                                                                        |
| <b>CABID</b>              | NL0001                                                                        |

## Revision History

| Version | Date       | Remarks       | By |
|---------|------------|---------------|----|
| v0.50   | 10/02/2023 | First draft   | MK |
| v1.00   | 13/04/2023 | Final release | MK |
|         |            |               |    |

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**Summary of Test results**

| FCC        | ISED             | Description                        | Section in report | Verdict |
|------------|------------------|------------------------------------|-------------------|---------|
| 15.109 (a) | ICES-003 Table 2 | Radiated spurious emissions < 1GHz | 3.1               | Pass    |

Decision rule: Pass/Fail decisions are based on measurement results without taking into account measurement uncertainty.

## 1 General Description

### 1.1 Applicant

|                      |                                               |
|----------------------|-----------------------------------------------|
| <b>Client name:</b>  | PinvAccess B.V.                               |
| <b>Address:</b>      | Laan van de Maagd 103, Apeldoorn, Netherlands |
| <b>Zip code:</b>     | 7324 BT                                       |
| <b>Telephone:</b>    | --                                            |
| <b>E-mail:</b>       | marijn@pinvaccess.com                         |
| <b>Contact name:</b> | Mr. Marijn Achterkamp                         |

### 1.2 Manufacturer

|                           |                                               |
|---------------------------|-----------------------------------------------|
| <b>Manufacturer name:</b> | PinvAccess B.V.                               |
| <b>Address:</b>           | Laan van de Maagd 103, Apeldoorn, Netherlands |
| <b>Zip code:</b>          | 7324 BT                                       |
| <b>Telephone:</b>         | --                                            |
| <b>E-mail:</b>            | marijn@pinvaccess.com                         |
| <b>Contact name:</b>      | Mr. Marijn Achterkamp                         |

### 1.3 Tested Equipment Under Test (EUT)

|                                |                      |
|--------------------------------|----------------------|
| <b>Product name:</b>           | FullCloud Controller |
| <b>Brand name:</b>             | PinvAccess B.V.      |
| <b>FCC ID:</b>                 | 2A225-FC2922         |
| <b>IC:</b>                     | 29825-FC2922         |
| <b>Product type:</b>           | IOT Cloud Controller |
| <b>Model(s):</b>               | --                   |
| <b>Batch and/or serial No.</b> | --                   |
| <b>Software version:</b>       | --                   |
| <b>Hardware version:</b>       | --                   |
| <b>Date of receipt</b>         | 25/01/2023           |
| <b>Tests started:</b>          | 06/02/2023           |
| <b>Testing ended:</b>          | 10/02/2023           |

Auxiliary items

**AUX1**

|                                |                 |
|--------------------------------|-----------------|
| <b>Product name:</b>           | NFC tag         |
| <b>Brand name:</b>             | --              |
| <b>Product type:</b>           | --              |
| <b>Model(s):</b>               | --              |
| <b>Batch and/or serial No.</b> | --              |
| <b>Remarks:</b>                | Connects to EUT |

## 1.4 Product specifications of Equipment under test

|                            |                                                                                     |
|----------------------------|-------------------------------------------------------------------------------------|
| <b>Tx Frequency:</b>       | NFC: 13.56 MHz<br>BLE: 2400 – 2483.5 MHz<br>Proprietary: 902 – 928 MHz              |
| <b>Rx Frequency:</b>       | NFC: 13.56 MHz<br>BLE: 2400 – 2483.5 MHz<br>Proprietary: 902 – 928 MHz              |
| <b>Antenna type</b>        | NFC: Loop Antenna<br>BLE: Ceramic Chip Antenna<br>Proprietary: Ceramic Chip Antenna |
| <b>Antenna gain</b>        | Proprietary: -2.6 dBi<br>BLE: 0.5 dBi                                               |
| <b>Type of modulation</b>  | NFC: ASK<br>BLE: GFSK<br>Proprietary: DSSS                                          |
| <b>Emission designator</b> | NFC: 423KA1D<br>BLE: 713KF1D<br>Proprietary: 696KF1D                                |

Disclaimer: above info is declared by the applicant

The EUT is considered as a Class B device.

## 1.5 Environmental conditions

|                            |                       |            |            |
|----------------------------|-----------------------|------------|------------|
| <b>Test date</b>           | 06-08/02/2023         | 09/02/2023 | 10/02/2023 |
| <b>Ambient temperature</b> | 21.2, 20.6, 20.4 (°C) | 20.7 (°C)  | 20.2 (°C)  |
| <b>Humidity</b>            | 24.5, 25.3, 26.3 (%)  | 24.6 (%)   | 27.1 (%)   |

## 1.6 Measurement standards

- ANSI C63.4:2014

## 1.7 Applicable standards

According to the specifications of the manufacturer, the EUT must comply with the requirements of the following standards:

- FCC Part 15 Subpart B
- ICES-003 Issue 7
- ICES-Gen Issue 2

## 1.8 Observation and remarks

Proprietary modulation use wideband DSSS modulation under IEEE 802.15.4 protocol, It advertise in 902.6 - 927.4 MHz band with 200 kHz channel width. Co-location test has been performed to observe the possible interference between the NFC and Proprietary. Also to note BLE and Proprietary cannot transmit simultaneously.



## 1.9 Conclusions

The sample of the product showed **NO NON-COMPLIANCES** to the specifications stated in paragraph 1.8 of this report.

The results of the test as stated in this report, are exclusively applicable to the product items as identified in this report. Kiwa Nederland B.V. accepts no responsibility for any properties of product items in this test report, which are not supported by the tests as specified in paragraph 1.8 "*Applicable standards*".

All tests are performed by:

Name : Maaz Harris Khan, BEng under supervision of Paul van Wanrooij, BASc

Review of test methods and report by:

Name : Roy van Barneveld

The above conclusions have been verified by the following signatory:

Date : 14-04-2023

Name : Raoul Tolud, MSc

Signature : 

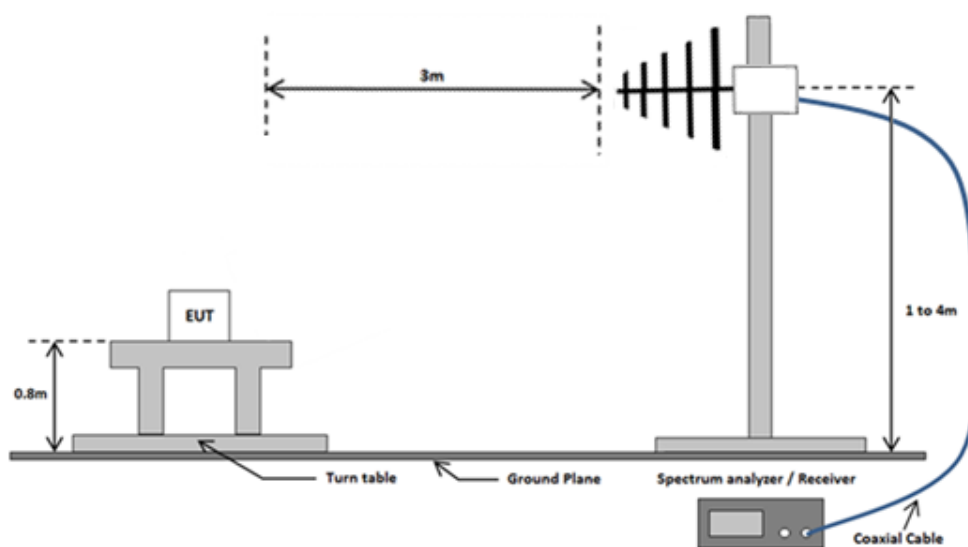
## 2 Test configuration of the Equipment Under Test

### 2.1 Test mode

The client provided the means to set the EUT in the different test mode required for all the test cases. The technology as well as frequency was changed using a Texas Instruments flash tool.

### 2.2 Test setups

#### 2.2.1 Radiated emissions test setup 30 MHz - 1 GHz



### **2.3 Test methodology.**

The test methodology used is based on the requirements of 47 CFR Part 15, sections 15.31, 15.107 and 15.109, ICES-003 and ICES-Gen. The test methods, which have been used, are based on ANSI C63.4-2014.

### **2.4 Equipment modifications.**

No modifications have been made to the equipment.

## 2.5 Equipment used in the test configuration

| Description                        | Manufacturer     | Model                       | ID              | Cal. Done date | Cal. due date | Used at Par. |
|------------------------------------|------------------|-----------------------------|-----------------|----------------|---------------|--------------|
| EMI Receiver                       | Rohde & Schwarz  | ESCI                        | 114161          | 01-2023        | 01-2024       | 3.1          |
| EMI Receiver                       | Rohde & Schwarz  | ESR7                        | 114534          | 02-2023        | 02-2025       | 3.1          |
| Spectrum analyzer                  | Rohde & Schwarz  | FSP40                       | 114792          | 03-2022        | 03-2023       | 3.1          |
| Spectrum Analyzer                  | Rohde & Schwarz  | FSV40                       | 114527          | 05-2022        | 05-2023       | 3.1          |
| 1.1 GHz HPF                        | Wainwright       | WHK1.1/15G-10EF             | 114682          | 09-2021        | 09-2024       | 3.1          |
| Active loop antenna                | EMCO             | 6502                        | 114515          | 01-2022        | 01-2024       | 3.1          |
| Biconical antenna + 6dB attenuator | Schwarzbeck + HP | VHA9103 + 8491A             | 114436 + 114254 | 03-2021        | 03-2024       | 3.1          |
| Logperiodic antenna                | EMCO             | 3147                        | 114385          | 03-2021        | 03-2024       | 3.1          |
| Test software                      | Raditeq          | Radimation Version 2021.1.9 | --              | --             | --            | 3.1          |

\*Note: Standard gain horn antennas do not need calibration

Conformance of the used measurement and test equipment with the requirements of ISO/IEC 17025:2017 has been confirmed before testing.

NA= Not Applicable

## 2.6 Sample calculations

All formulas for data conversions and conversion factors are reported in chapter 4 of this test report.

### 3 Test results

#### 3.1 Radiated spurious emissions

##### 3.1.1 Limit

Except for Class A digital devices, the field strength of radiated emissions from an unintentional radiator shall not exceed the field strength levels specified in the following tables.

On any frequency or frequencies below or equal to 1000 MHz, the limits shown are based on measuring equipment employing a CISPR quasi-peak detector function and related measurement bandwidths, unless otherwise specified.

Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function.

When average radiated emission measurements are specified in this part, there is also a limit on the peak level of the emissions. Unless otherwise specified, the limit on peak emissions is 20 dB above the average limit.

The product under test shall comply with both the average and the peak limits.

ICES-003 Issue 7 section 3.2.2

The quasi-peak limits for the electric component of the radiated field strength emitted from ITE or digital apparatus, within 30 MHz to 1 GHz, for a measurement distance of 3m are presented in table below.

At and above 1 GHz, except for outdoor units of home satellite receiving systems, the ITE or digital apparatus shall comply with the limits specified in table below up to the frequency  $F_M$ , which shall be determined. The product under test shall comply with both the average and the peak limits.

FCC 15.109(a)

| Frequency (MHz) | Field strength ( $\mu\text{V}/\text{meter}$ ) | Field strength ( $\text{dB}\mu\text{V}/\text{m}$ ) | Measurement distance (meters) |
|-----------------|-----------------------------------------------|----------------------------------------------------|-------------------------------|
| 30-88           | 100                                           | 40.0                                               | 3                             |
| 88-216          | 150                                           | 43.5                                               | 3                             |
| 216-960         | 200                                           | 46.0                                               | 3                             |
| Above 960       | 500                                           | 54.0                                               | 3                             |

ICES-003 tables 2, 4

| Frequency (MHz) | Field strength ( $\mu\text{V}/\text{meter}$ ) | Field strength ( $\text{dB}\mu\text{V}/\text{m}$ ) | Measurement distance (meters) |
|-----------------|-----------------------------------------------|----------------------------------------------------|-------------------------------|
| 30-88           | 100                                           | 40.0                                               | 3                             |
| 88-216          | 150                                           | 43.5                                               | 3                             |
| 216-230         | 200                                           | 46.0                                               | 3                             |
| 230 -960        | 224                                           | 47.0                                               | 3                             |
| Above 960       | 500                                           | 54.0                                               | 3                             |

##### 3.1.2 Measurement instruments

The measurement instruments are listed in chapter 2.5 of this report.

##### 3.1.3 Test setup

The test setup is as shown in chapter 2.2.1 of this report.

### 3.1.4 Test procedure

30 MHz to 26.5 GHz: According to ANSI C63.4-2014, section 8.3

30 MHz to 1 GHz: IRN 441 – Method 1

1 GHz to 18 GHz: IRN 441 – Method 2

18 to 26.5 GHz: IRN 441– Method 3

In case of handheld and/or body-worn equipment, the EUT's orientation (X, Y, Z) was varied in order to ensure that maximum emission amplitudes were attained. In all other cases the associated cabling and the EUT orientation was varied for maximum emissions.

The spectrum was examined from 30MHz to the highest measurement frequency according to the table below. Final radiated emission measurements were made at 3m distance.

| Highest internal frequency ( $F_X$ ) <sup>i</sup>                                                               | Highest measurement frequency ( $F_M$ )  |
|-----------------------------------------------------------------------------------------------------------------|------------------------------------------|
| $F_X \leq 108 \text{ MHz}$                                                                                      | 1 GHz                                    |
| $108 \text{ MHz} < F_X \leq 500 \text{ MHz}$                                                                    | 2 GHz                                    |
| $500 \text{ MHz} < F_X \leq 1 \text{ GHz}$                                                                      | 5 GHz                                    |
| $F_X > 1 \text{ GHz}$                                                                                           | $5 \times F_X$ up to a maximum of 40 GHz |
| i. $F_X$ is the highest fundamental frequency generated and/or used in the ITE or digital apparatus under test. |                                          |

The 6 highest emission amplitudes relative to the appropriate limit were recorded in this report. Field strength values of radiated emissions at frequencies not listed in the tables are more than 20 dB below the applicable limit.

### 3.1.5 Measurement Uncertainty

| Frequency range | Polarization | Uncertainty          |
|-----------------|--------------|----------------------|
| 30 – 200 MHz    | Horizontal   | $\pm 4.5 \text{ dB}$ |
|                 | Vertical     | $\pm 5.4 \text{ dB}$ |
| 200 -1000 MHz   | Horizontal   | $\pm 3.6 \text{ dB}$ |
|                 | Vertical     | $\pm 4.6 \text{ dB}$ |

### 3.1.6 Test results

#### 30 – 250 MHz NFC read mode

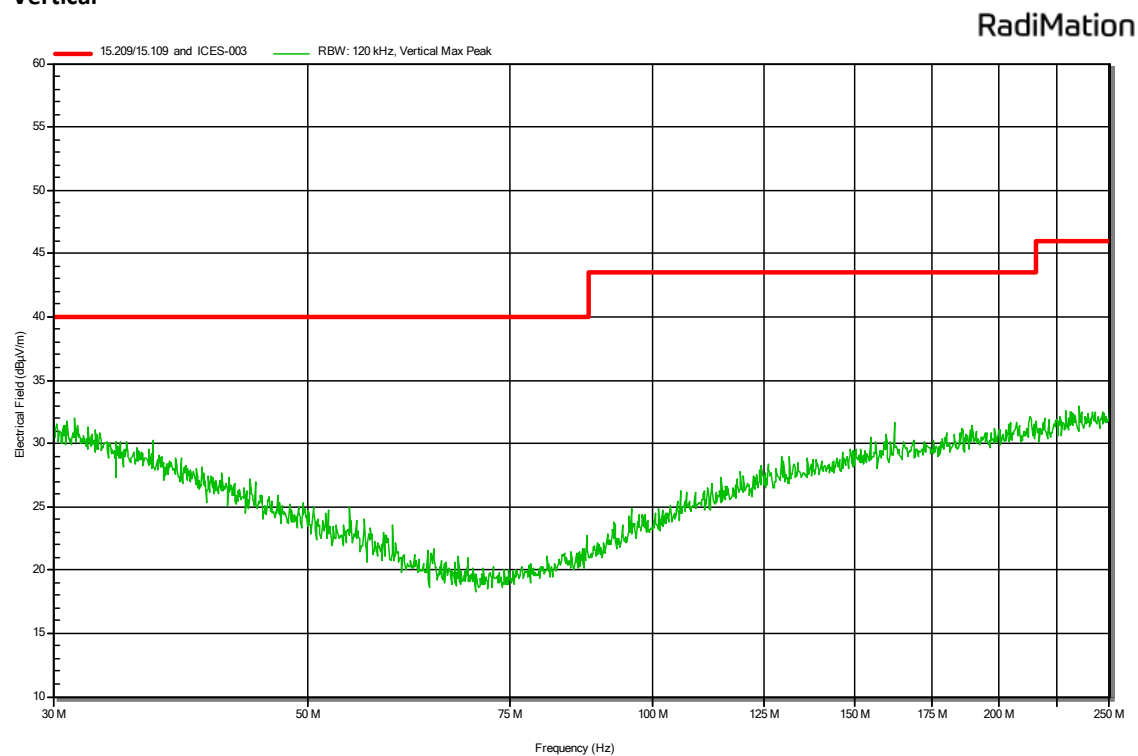
| Frequency  | Peak              | Quasi-Peak        | Quasi-Peak Limit | Status | Height | Pol |
|------------|-------------------|-------------------|------------------|--------|--------|-----|
| 67.812 MHz | 31.1 dB $\mu$ V/m | 30.1 dB $\mu$ V/m | 40 dB $\mu$ V/m  | Pass   | 1.7 m  | Ver |
| 40.686 MHz | 38 dB $\mu$ V/m   | 36.7 dB $\mu$ V/m | 40 dB $\mu$ V/m  | Pass   | 1 m    | Ver |

The results of the radiated emission tests are depicted in the table above. A selection of plots is provided on the next pages

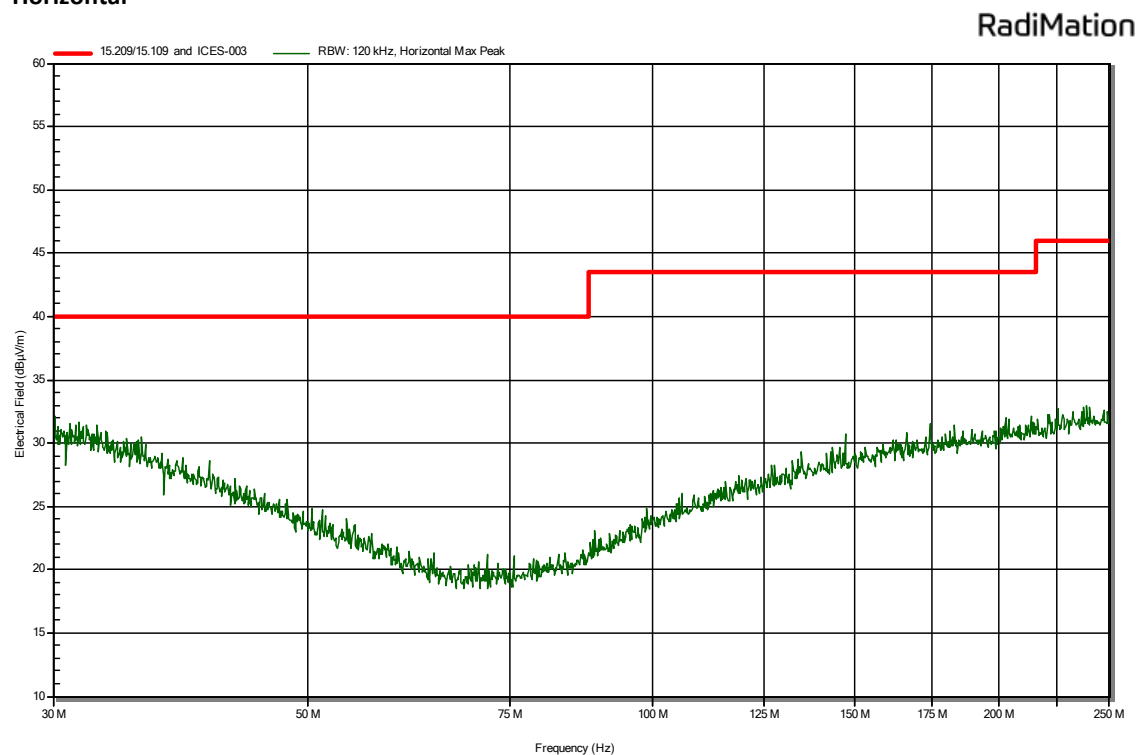
### 3.1.7 Plots of the Radiated Spurious Emissions Measurement

30MHz – 250MHz NFC read mode (no tag)

Vertical



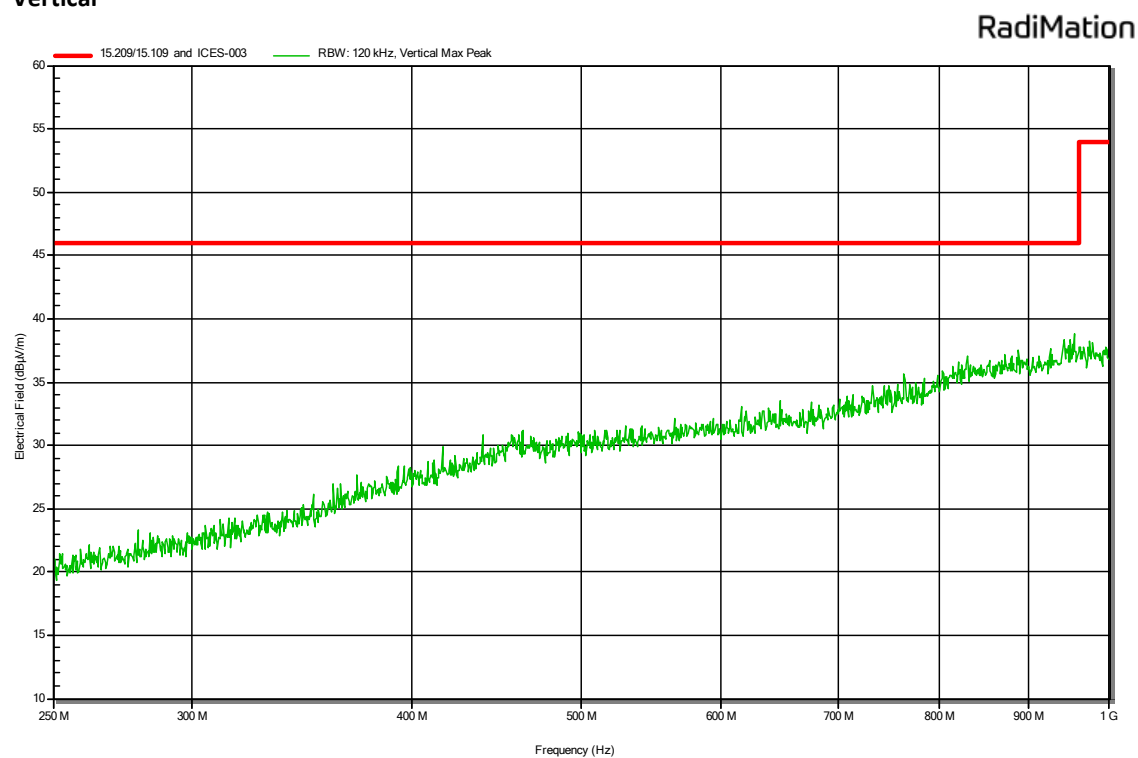
Horizontal



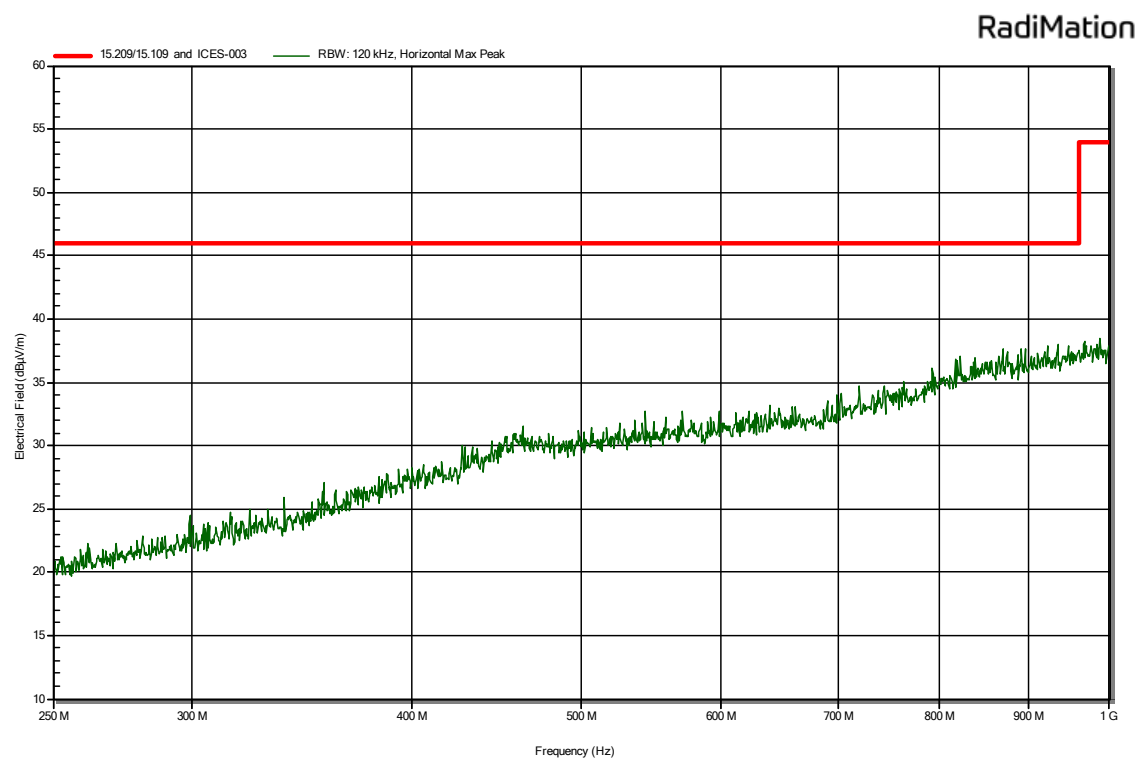


## 250MHz – 1000MHz NFC read mode (no tag)

### Vertical



### Horizontal



## 4 Sample calculations

All formulas for data conversions and conversion factors are reported in this chapter.

Conducted emission Measurement:

$$U_{\text{lisn}} (\text{dB}\mu\text{V}) = U (\text{dB}\mu\text{V}) + \text{Corr. (dB)}$$

Where:

U = Measuring receiver voltage

LISN insertion loss = Voltage division factor of LISN

Corr. = sum of single correction factors of used LISN, cables and pulse limiter.

Linear interpolation will be used for frequencies in between the values in the table.

| Frequency (Mhz) | Voltage division LISN (db)                         | Insertion Loss<br>Pulse limiter (dB)             | Cable loss (dB) | Corr. (dB) |
|-----------------|----------------------------------------------------|--------------------------------------------------|-----------------|------------|
|                 | TE 00208 SN: 892785/004<br>Rohde & Schwarz ESH3-Z5 | TE 00756 SN: 5SM03153<br>Rohde & Schwarz ESH3-Z2 | TE 11134        |            |
| 0,15            | 0,09                                               | 9,87                                             | 0,02            | 9,98       |
| 0,2             | 0,1                                                | 9,87                                             | 0,03            | 10         |
| 0,3             | 0,1                                                | 9,87                                             | 0,03            | 10         |
| 0,5             | 0,1                                                | 9,87                                             | 0,08            | 10,05      |
| 0,7             | 0,12                                               | 9,87                                             | 0,25            | 10,24      |
| 0,8             | 0,12                                               | 9,87                                             | 0,25            | 10,24      |
| 1               | 0,13                                               | 9,87                                             | 0,11            | 10,11      |
| 2               | 0,16                                               | 9,87                                             | 0,15            | 10,18      |
| 3               | 0,19                                               | 9,87                                             | 0,21            | 10,27      |
| 5               | 0,26                                               | 9,88                                             | 0,21            | 10,35      |
| 7               | 0,36                                               | 9,89                                             | 0,25            | 10,5       |
| 8               | 0,39                                               | 9,89                                             | 0,25            | 10,53      |
| 10              | 0,46                                               | 9,91                                             | 0,29            | 10,66      |
| 15              | 0,77                                               | 9,93                                             | 0,34            | 11,04      |
| 20              | 0,95                                               | 9,96                                             | 0,37            | 11,28      |
| 25              | 1,12                                               | 9,99                                             | 0,43            | 11,54      |
| 30              | 1,1                                                | 10,04                                            | 0,45            | 11,59      |

# Field Strength Measurement:

$$E \text{ (dB}\mu\text{V/m)} = U \text{ (dB}\mu\text{V)} + AF \text{ (dB/m)} + \text{Corr. (dB)}$$

Where:

E = Electric field strength

U = Measuring receiver voltage

AF = Antenna factor

CL = Cable loss

Corr. = sum of single correction factors of used cable and amplifier (if applicable).

Linear interpolation will be used for frequencies in between the values in the table.

Tables shows an extract of the values.

| Frequency (Mhz) | AF (dB/m)                                | Cable loss (dB) | Corr. (dB) |
|-----------------|------------------------------------------|-----------------|------------|
|                 | Id: 109683<br>Chase CBL6112B<br>SN: 2408 | Id: SAR cable   |            |
| 30              | 25,4                                     | 0,68            | 26,1       |
| 100             | 16,8                                     | 1,15            | 18,0       |
| 150             | 16,8                                     | 1,41            | 18,2       |
| 200             | 15,3                                     | 1,63            | 16,9       |
| 250             | 19,3                                     | 1,93            | 21,2       |
| 300             | 13,3                                     | 2,12            | 15,4       |
| 350             | 14,6                                     | 2,20            | 16,8       |
| 400             | 22,0                                     | 2,29            | 24,3       |
| 450             | 23,0                                     | 2,53            | 25,5       |
| 500             | 23,8                                     | 2,67            | 26,5       |
| 550             | 25,4                                     | 2,90            | 28,3       |
| 600             | 24,8                                     | 3,02            | 27,8       |
| 650             | 25,2                                     | 3,09            | 28,3       |
| 700             | 25,0                                     | 3,22            | 28,2       |
| 750             | 25,8                                     | 3,56            | 29,4       |
| 800             | 25,8                                     | 3,69            | 29,5       |
| 900             | 26,5                                     | 3,81            | 30,3       |
| 950             | 27,0                                     | 3,91            | 30,9       |
| 1000            | 27,4                                     | 4,30            | 31,7       |

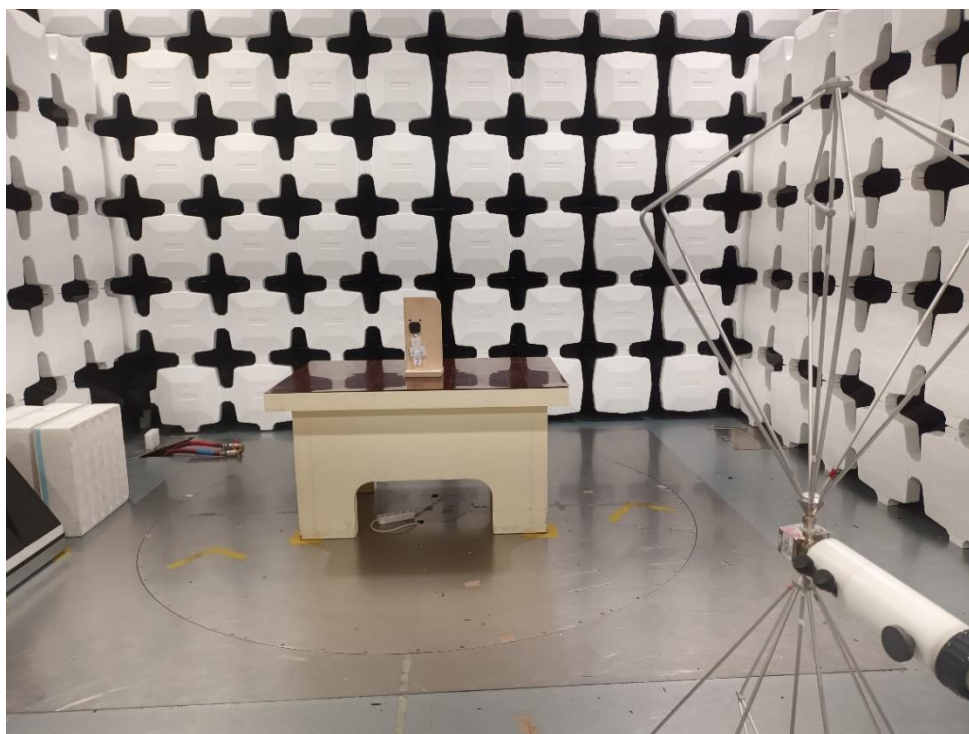
| Frequency (MHz) | AF (dB/m)                              | Gain (dB)                                  | Cable loss (dB) | Corr. (dB) |
|-----------------|----------------------------------------|--------------------------------------------|-----------------|------------|
|                 | TE 00531<br>Emco 3115<br>SN: 9412-4377 | TE 11132<br>Miteq<br>JS4-18004000-30-8P-A1 | TE 01315        |            |
| 1000            | 23,6                                   | 40,4                                       | 2,0             | 66         |
| 1500            | 25,1                                   | 40,5                                       | 2,4             | 68         |
| 2000            | 27,1                                   | 40,5                                       | 2,7             | 70,3       |
| 2500            | 28,6                                   | 40,7                                       | 3,2             | 72,5       |
| 3000            | 30,5                                   | 40,7                                       | 3,2             | 74,4       |
| 3500            | 31,2                                   | 40,7                                       | 3,4             | 75,3       |
| 4000            | 32,7                                   | 40,9                                       | 4,9             | 78,5       |
| 4500            | 32,4                                   | 40,9                                       | 4,4             | 77,7       |
| 5000            | 33,2                                   | 40,7                                       | 4,6             | 78,5       |
| 5500            | 34,0                                   | 40,5                                       | 4,5             | 79         |
| 6000            | 34,6                                   | 40,0                                       | 5,2             | 79,8       |
| 6500            | 34,3                                   | 39,4                                       | 5,9             | 79,6       |
| 7000            | 35,2                                   | 38,6                                       | 5,7             | 79,5       |
| 7500            | 36,4                                   | 39,2                                       | 5,9             | 81,5       |
| 8000            | 37,0                                   | 38,9                                       | 6,3             | 82,2       |
| 8500            | 37,5                                   | 38,4                                       | 6,4             | 82,3       |
| 9000            | 38,1                                   | 37,4                                       | 6,5             | 82         |
| 9500            | 37,8                                   | 37,0                                       | 7,1             | 81,9       |
| 10000           | 38,2                                   | 36,5                                       | 7,3             | 82         |
| 10500           | 38,1                                   | 36,7                                       | 7,6             | 82,4       |
| 11000           | 38,3                                   | 36,9                                       | 8,3             | 83,5       |
| 11500           | 38,5                                   | 37,6                                       | 8,1             | 84,2       |
| 12000           | 39,1                                   | 38,3                                       | 8,4             | 85,8       |
| 12500           | 38,7                                   | 38,5                                       | 8,3             | 85,5       |
| 13000           | 39,2                                   | 38,9                                       | 9,2             | 87,3       |
| 13500           | 40,5                                   | 40,2                                       | 8,3             | 89         |
| 14000           | 41,1                                   | 40,0                                       | 8,2             | 89,3       |
| 14500           | 41,4                                   | 40,1                                       | 8,2             | 89,7       |
| 15000           | 40,2                                   | 41,4                                       | 8,3             | 89,9       |
| 15500           | 37,9                                   | 41,4                                       | 8,6             | 87,9       |
| 16000           | 37,5                                   | 42,8                                       | 9,2             | 89,5       |
| 16500           | 38,6                                   | 42,3                                       | 8,8             | 89,7       |
| 17000           | 41,1                                   | 43,1                                       | 9,4             | 93,6       |
| 17500           | 42,7                                   | 43,2                                       | 9,4             | 95,3       |
| 18000           | 44,0                                   | 44,2                                       | 9,8             | 98         |

| Frequency (MHz) | AF (dB/m)                                | Gain (dB)                                  | Cable loss (dB) | Corr. (dB) |
|-----------------|------------------------------------------|--------------------------------------------|-----------------|------------|
|                 | TE 00818<br>Flann 20240-25<br>SN: 163703 | TE 11131<br>Miteq<br>JS4-18004000-30-8P-A1 | TE 01315        |            |
| 18000           | 31,3                                     | 26,2                                       | 9,8             | 67,3       |
| 19000           | 31,5                                     | 26,1                                       | 9,6             | 67,2       |
| 20000           | 31,7                                     | 25,9                                       | 11              | 68,6       |
| 21000           | 31,9                                     | 24,3                                       | 10,7            | 66,9       |
| 22000           | 32,1                                     | 18,3                                       | 10,5            | 60,9       |
| 23000           | 32,2                                     | 18,9                                       | 10,8            | 61,9       |
| 24000           | 32,3                                     | 23,6                                       | 11,4            | 67,3       |
| 25000           | 32,4                                     | 24,5                                       | 11,6            | 68,5       |
| 26000           | 32,5                                     | 25,3                                       | 11,7            | 69,5       |

## 5 Photograph test setup

### 5.1 Photograph test setup Radiated Emissions

*Photo 1 Photograph test setup radiated emissions 30-250 MHz, report section 3.1*



*Photo 2 Photograph test setup radiated emissions 250-1000 MHz, report section 3.1*

