TEST REPORT

For

Intuitive Surgical, Inc.

1020 Kifer Road, Sunnyvale, CA 94086, USA

Part Number: 374500-30

Report Type:	**Product Type:**
Test Report	Endoscope System Controller

Prepared By	Will Hu Test Engineer
Report Number	T2312072
Report Issue Date	2023-12-18
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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	T2312072	Test Report	2023-12-18

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report was prepared on behalf of Intuitive Surgical, Inc. and their product Part Number: 374500-30, or the "EUT" as referred to in this report. The EUT is an Endoscope System Controller(ESC).

Manufacturer	Description	Part Number	Serial Number
Intuitive Surgical, Inc.	Endoscope System Controller(ESC)	374500-30	10273950

1.2 Local Support Equipment

N/A

1.3 Remote Support Equipment

Manufacturer	Description	Part Number	Serial Number
Intuitive Surgical, Inc.	Endoscope, 0 degree	470066-10X	10299216

1.4 EUT Configuration

Mode	Frequency
TX	60 GHz

1.5 Objective

This report was prepared on behalf of *Intuitive Surgical, Inc.* in accordance with FCC KDB 453097.
The frequency range of radiated testing must be in accordance with 47 C.F.R. § 15.33(a)(3); the upper frequency of measurement range is the 5th harmonic of the highest fundamental frequency or 200 GHz whichever is lower.

The device must meet the emission limits for Class B unintentional radiators specified in 47 C.F.R. Part 15 Subpart B.

The objective was to report measurement data for the verification testing conducted from 2023-12-04 to 2023-12-06.

1.6 Related Submittal(s)/Grant(s)

N/A

1.7 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.4.

1.8 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 º C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.9 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.10 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- ***An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02)*****,** in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03)*** to certify

- For the USA (Federal Communications Commission):
  - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
  - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
  - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
  - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
  - 2 All Scope 2-Licensed Personal Mobile Radio Services;
  - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
  - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
  - 5 All Scope 5-Licensed Fixed Microwave Radio Services
  - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
  - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
  - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
  - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
  - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
  - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
  - 1 MIC Telecommunication Business Law (Terminal Equipment):
    - All Scope A1 - Terminal Equipment for the Purpose of Calls;
    - All Scope A2 - Other Terminal Equipment

2 Radio Law (Radio Equipment):
- All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
- All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
- All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01)*** to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

1 Electronics and Office Equipment:
- for Telephony (ver. 3.0)
- for Audio/Video (ver. 3.0)
- for Battery Charging Systems (ver. 1.1)
- for Set-top Boxes & Cable Boxes (ver. 4.1)
- for Televisions (ver. 6.1)
- for Computers (ver. 6.0)
- for Displays (ver. 6.0)
- for Imaging Equipment (ver. 2.0)
- for Computer Servers (ver. 2.0)

2 Commercial Food Service Equipment
- for Commercial Dishwashers (ver. 2.0)
- for Commercial Ice Machines (ver. 2.0)
- for Commercial Ovens (ver. 2.1)
- for Commercial Refrigerators and Freezers

3 Lighting Products
- For Decorative Light Strings (ver. 1.5)
- For Luminaires (including sub-components) and Lamps (ver. 1.2)
- For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
- For Integral LED Lamps (ver. 1.4)

4 Heating, Ventilation, and AC Products
- for Residential Ceiling Fans (ver. 3.0)
- for Residential Ventilating Fans (ver. 3.2)

5 Other
- For Water Coolers (ver. 3.0)

D- ***A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:***

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
  - BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;

- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
    - ENERGY STAR Recognized Test Laboratory – US EPA
    - Telecommunications Certification Body (TCB) – US FCC;
    - Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 Summary of Test Results

Results reported relate only to the product tested.

Standard Rules	Description of Test	Results
47 C.F.R. Part 15 Subpart B	Radiated Spurious Emissions	Refer to Section 3

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

3 FCC §15.109 - Spurious Radiated Emissions

3.1 Applicable Standards

As per FCC §15.35(d): 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. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.109(a): Except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the following values:

Frequency of emission(MHz)	Field strength (micro volts/meter)
30-88	100
88-216	150
216-960	200
Above 960	500

As per FCC §15.109(b): The field strength of radiated emissions from a Class A digital device, as determined at a distance of 10 meters, shall not exceed the following:

Frequency (MHz)	Field Strength (micro volts/meter)
30-88	90
88-216	150
216-960	210
Above 960	300

As per ISEDC RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emission from licence-exempt transmitters shall company with the field strength limits shown in the table below. Additional, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

General Field Strength Limits for Licence-Exemption Transmitters at Frequencies above 30 MHz

Frequency (MHz)	Field Strength (µv/m at 3 meters)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for licence-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

3.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.4. The specification used was the FCC Part 15.109 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

3.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was connected to the AC floor outlet.

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

The EUT was set 3 meter(or shorter distance depending on frequency range) away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
(2) Average: RBW = 1MHz / VBW = 10Hz / Sweep = Auto

Note: RBW reduced in some cases in order to show that no emissions were present and noise floor was below limits

3.4 Corrected Amplitude & Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

CA = S.A. Reading + Correction Factor

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

Correction Factor = AF + CL + Atten – Ga

The "**Margin**" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

Margin = Corrected Amplitude – Limit

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

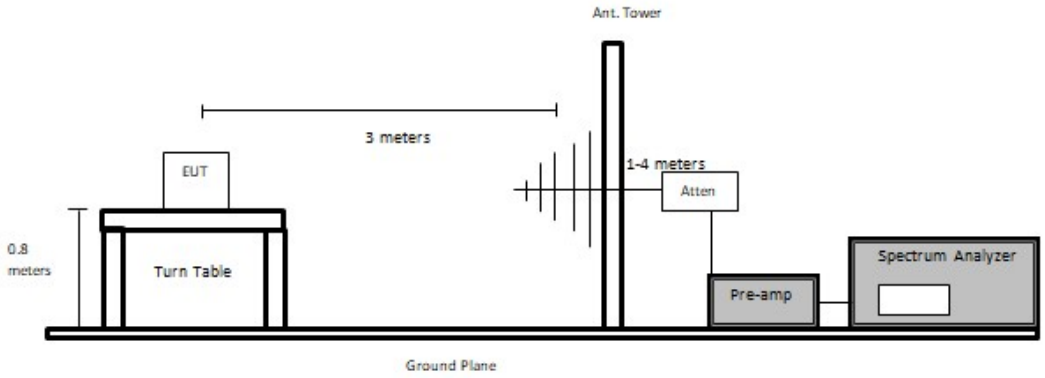
For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The "**Margin**" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

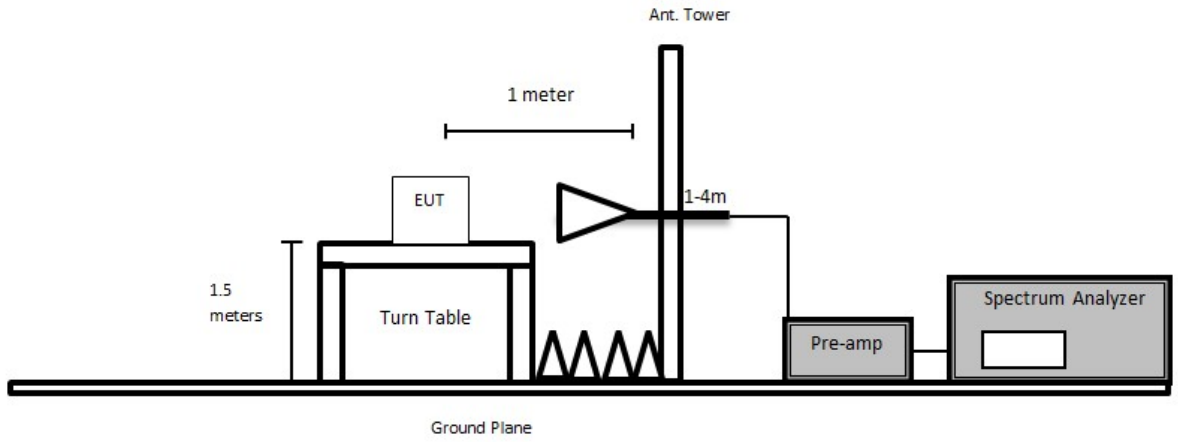
$$Margin = Corrected\ Amplitude - Limit$$

3.5 Test Setup Block Diagram

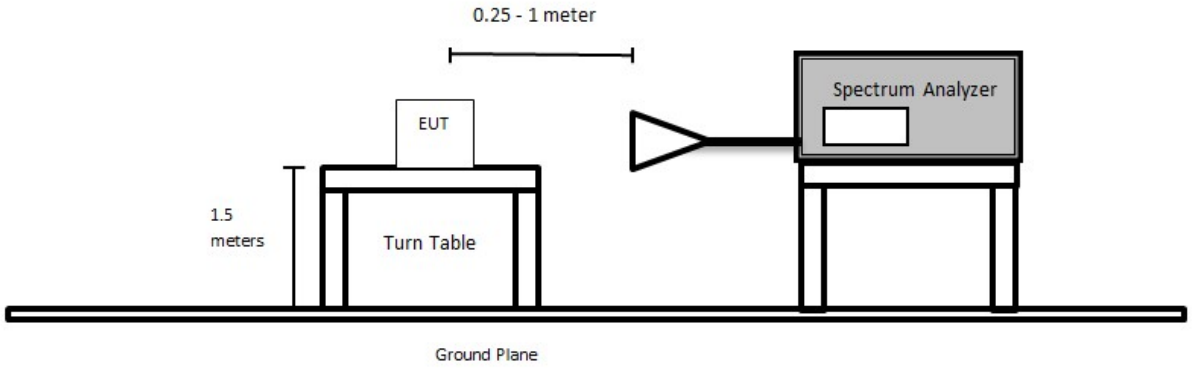
Below 1 GHz:



1 GHz- 40GHz:



Above 40 GHz:



3.6 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
124	Rhode & Schwarz	EMI Test Receiver	ESCI	100044	2023-06-16	1 year
327	Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/R
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	N/R	N/R
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/R
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2023-09-26	6 months
658	HP/ Agilant	Pre Amplifier	8449B OPT HO2	3008A01103	2023-12-01	6 months
1247	Uti flex	Micro - Coax	N/A	N/A	2023-12-01	6 months
827	AH Systems	Preamplifier	PAM 1840 VH	170	2023-11-08	6 months
307	Sunol Sciences	Biconilog Antenna	JB3	A020106-3; 01182018A	2022-03-21	2 years
-	-	6dB Attenuator	PE7390-6	01182018A	2022-03-21	2 years
1192	ETS Lindgren	Horn Antenna	3117	00218973	2022-09-29	2 years
90	Wisewave	Antenna, Horn	ARH-4223-02	10555-01	2023-05-02	2 years
92	Wisewave	Antenna, Horn	ARH-2823-02	10555-01	2022-03-17	2 years
861	OML Inc.	Mixer and Horn Antenna set	M03HWA, M05HWA M08HWA M012HWA	170615-1	N/R	N/A
1186	Pasternack	Coaxial Cable, RG214	PE3062-1050CM	N/A	2023-10-03	6 months
1246	Hewlet Packard	RF Limiter	11867A	01734	2023-04-13	1 year
1248	Pasternack	RG214 COAX Cable	PE3062	N/A	2023-10-04	6 months
1249	Time Microwave	LMR-400 Cable Dc-3 GHz	AE13684	2k80612-5 6fts	2023-10-09	6 months
1346	RFMW	2.92mm 10ft RF cable	KMSE-160SAW-240.0-KSME	N/A	2023-11-03	6 months
1354	RFMW	2.92mm 10ft RF Cable DC to 40 GHz	P1CA-29M29M-F150-120	N/A	2023-08-24	6 months
1295	Carlisle	10m Ultra Low Loss Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2023-10-31	6 months

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

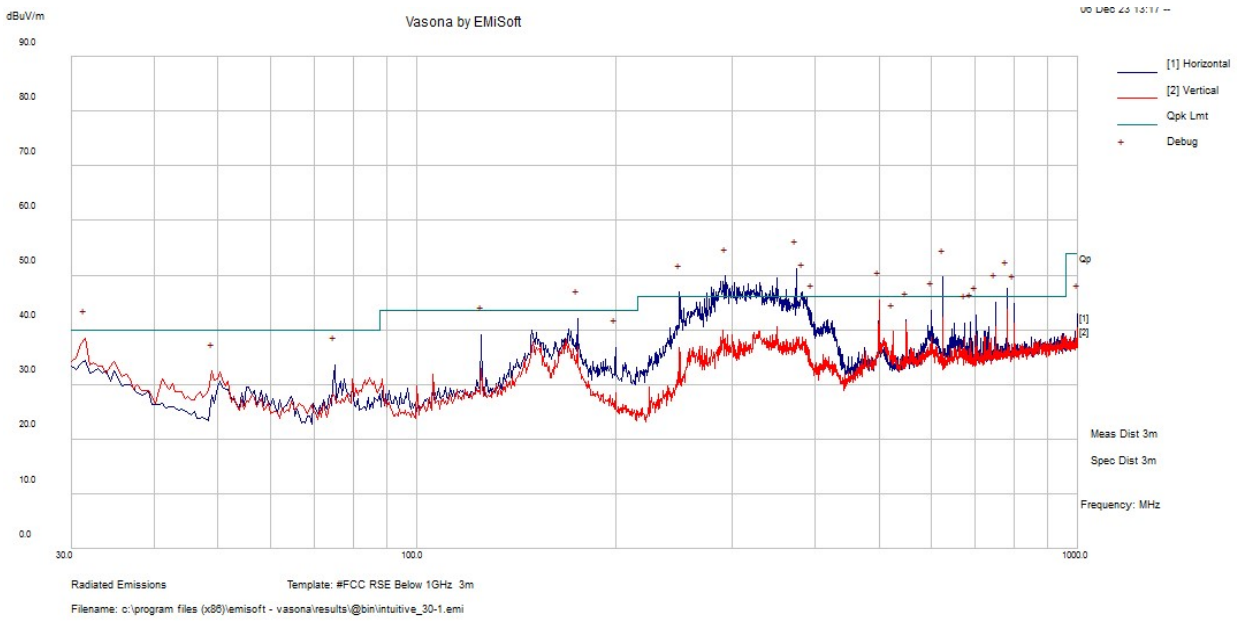
3.7 Test Environmental Conditions

Temperature:	23 ºC
Relative Humidity:	39.4 %
ATM Pressure:	101.8 kPa

The testing was performed by Will Hu on 2023-12-04 and 2023-12-06 at 5 meter chamber 3.

3.8 Radiated Emissions Test Results

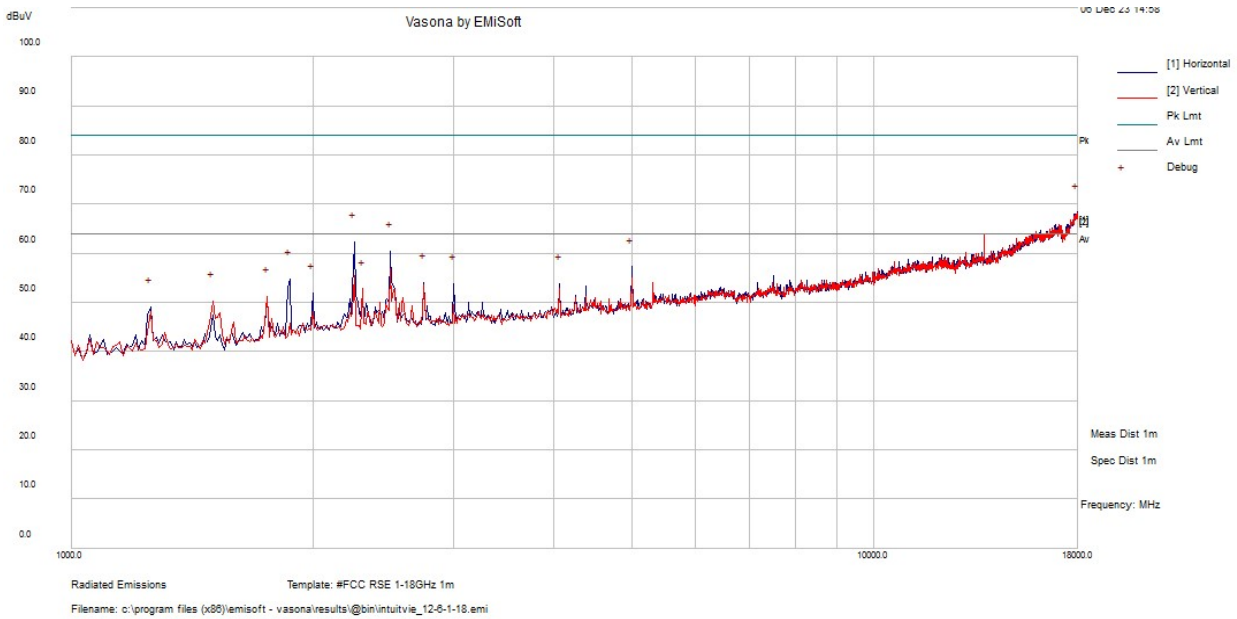
30 MHz – 1 GHz measured at 3meters



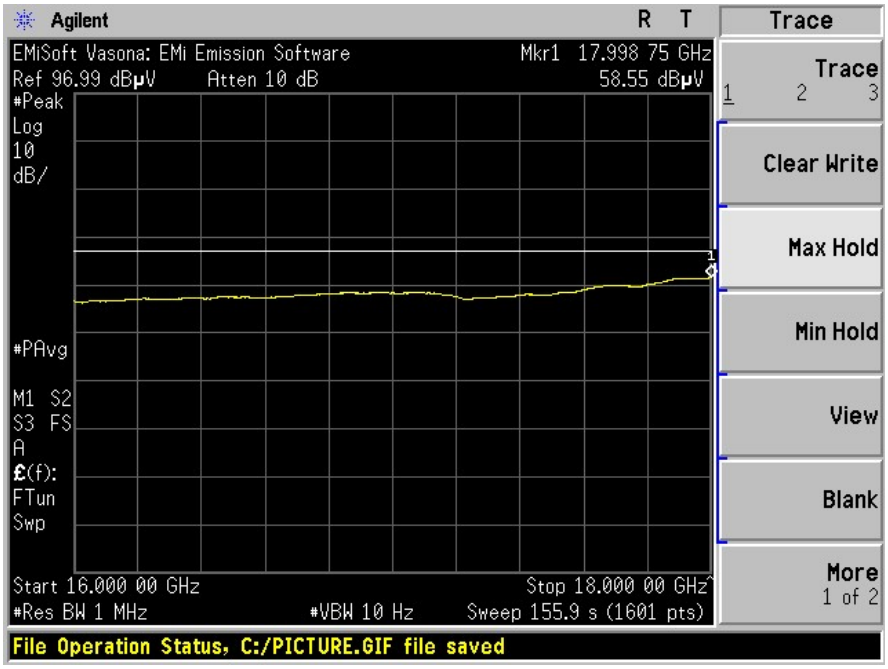
Frequency (MHz)	S.A. Reading (dBµV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
375.0055	51.38	-5.7	45.68	108	H	57	46	-0.32	QP/Pass
293.0335	51.18	-7.5	43.68	101	H	65	46	-2.32	QP/Pass
624.997	35.27	0.01	35.28	122	H	44	46	-10.72	QP/Pass[1]
781.23	40.24	2.16	42.4	227	H	31	46	-3.6	QP/Pass
383.6825	45.51	-5.56	39.95	105	H	71	46	-6.05	QP/Pass
249.9485	51.96	-9.42	42.54	130	H	68	46	-3.46	QP/Pass

Note[1]: Failing frequency at 624.997 MHz was detected with the endoscopic camera installed. The source of this emission was found to be a 312.5 MHz oscillator on a PCA in the endoscope plug. The camera was replaced with a plug having a video pattern generator which exercised the 60 GHz link, and the oscillator was turned off. Once this oscillator was turned off, the emission strength passed the applicable limit shown in the above table. Thus it was shown that the 60GHz link is compliant with requirements.

1 GHz – 18 GHz measured at 1 meter



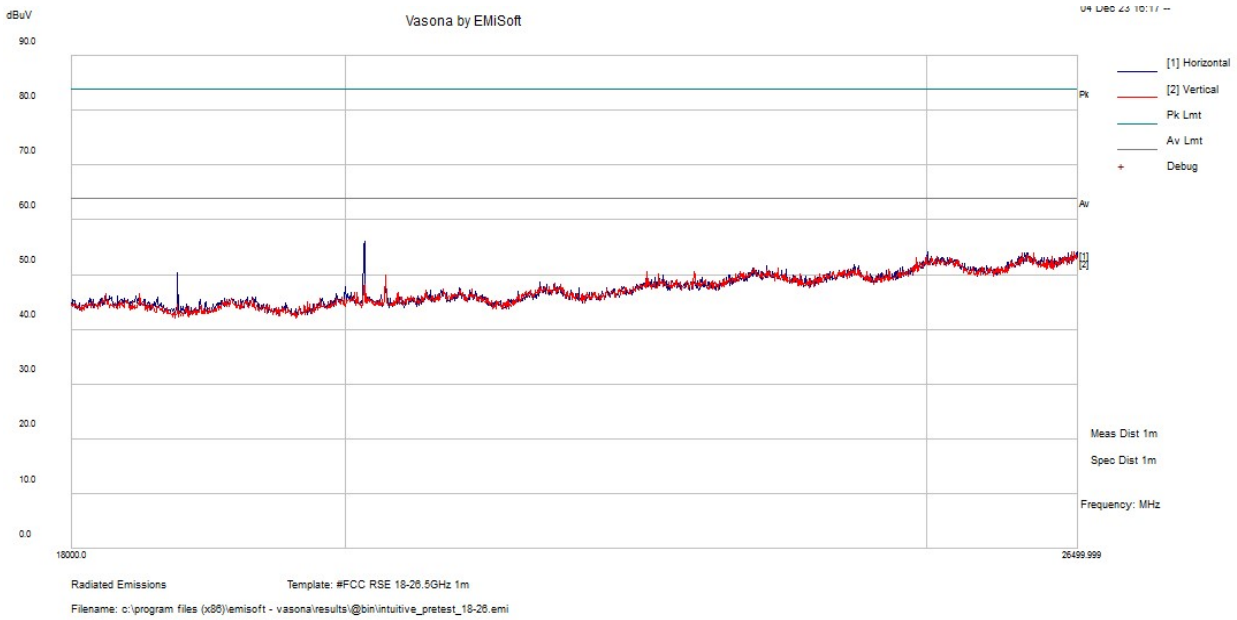
Note: above plot shows all peak emissions below 16GHz pass under average limits



Note: above plot shows reduced VBW to make average measurements comparing to average limits and thus show compliance in range of 16-18GHz.

Note: Distance conversion using formula 20*log(1m/3m)= 9.54dB was applied to the limit at 1 meter in order to show the corrected plots at 1 meter pass the requirements. In this instance, the limit converts to 64dBuV/m at 1meter.

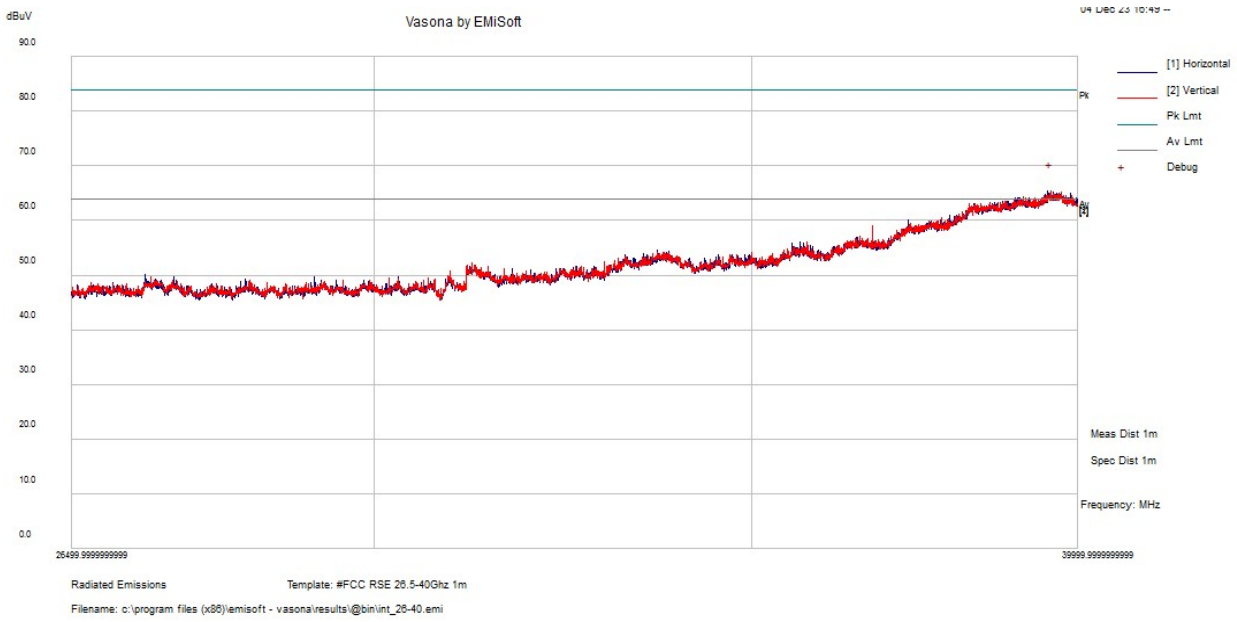
18 GHz – 26.5 GHz measured at 1 meter



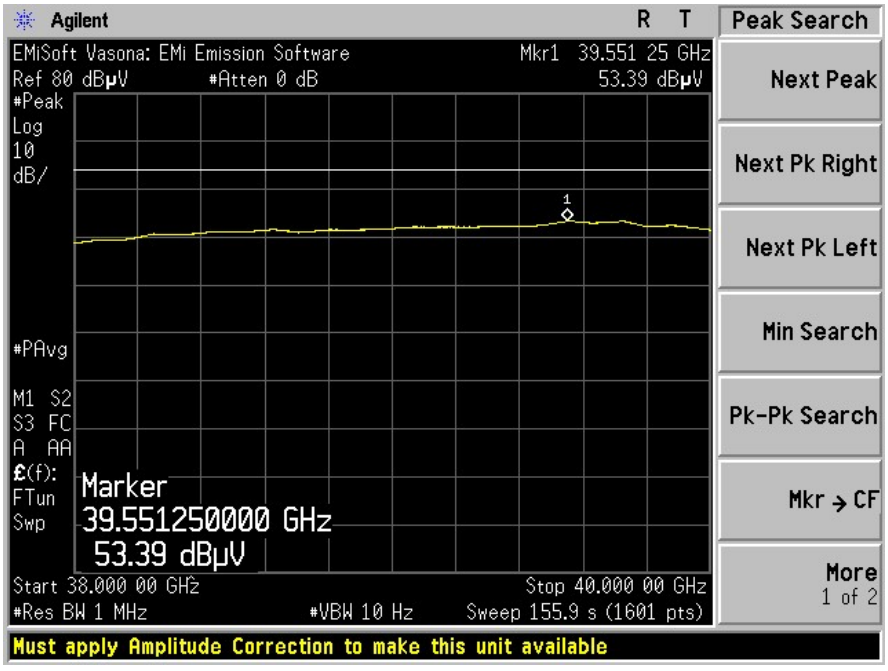
Note: above plot shows all peak emissions pass under average limits

Note: Distance conversion using formula 20*log(1m/3m)= 9.54dB was applied to the limit at 1 meter in order to show the corrected plots at 1 meter pass the requirements. In this instance, the limit converts to 64dBuV/m at 1meter.

26.5 - 40 GHz measured at 1 meter



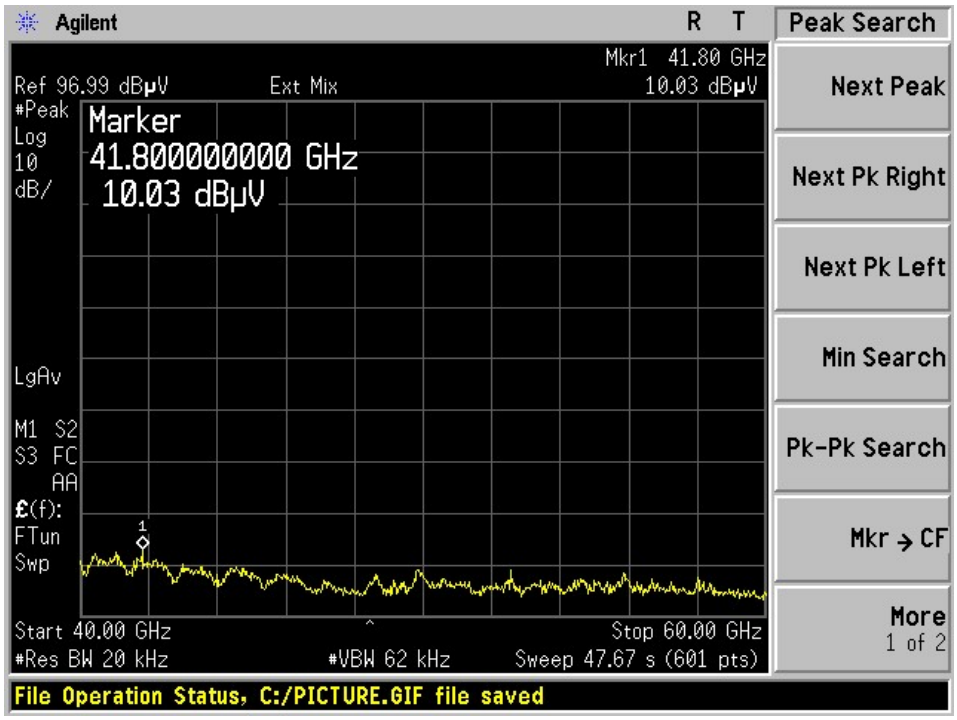
Note: above plot shows all peak emissions below 38GHz pass under average limits



Note: above plot shows reduced VBW to make average measurements comparing to average limits and thus show compliance in range of 38-40GHz.

Note: Distance conversion using formula 20*log(1m/3m)= 9.54dB was applied to the limit at 1 meter in order to show the corrected plots at 1 meter pass the requirements. In this instance, the limit converts to 64dBuV/m at 1meter.

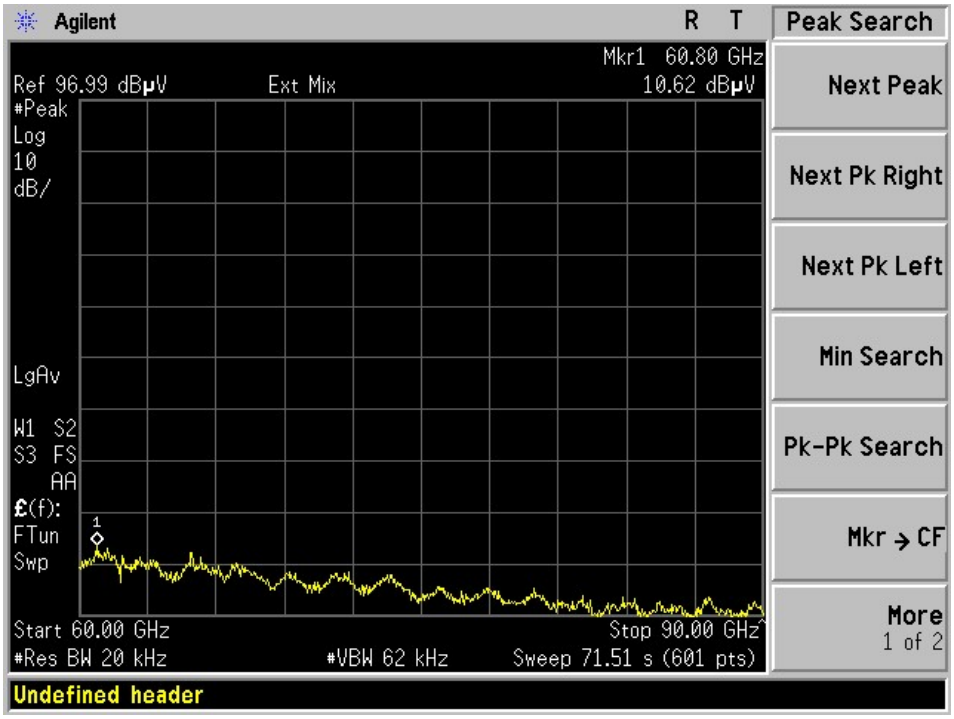
40 GHz- 60 GHz



Frequency Range (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Distance Conversion (dB)	Corrected Amplitude (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comment
40-60GHz	10.03	42.4	-9.54	42.89	54	-11.11	Pass

Note: Reduced RBW to show noise floor below average requirements
Note: Above measurement made at distance 1 meter
Note: Correction Factor includes Antenna Factor (dB/m) + Path Loss(dB)
Note: Corrective Factors are determined by applying
Note: Distance conversion using formula 20*log(x/3m) for converting measurement to the applicable 3meter distance requirement

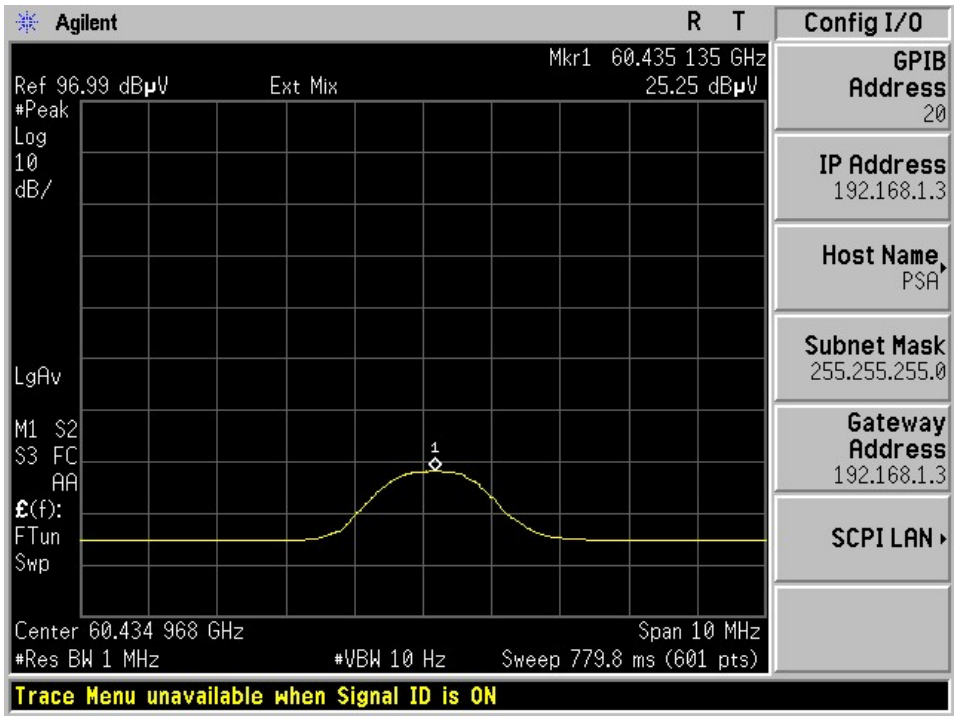
60 GHz- 90 GHz



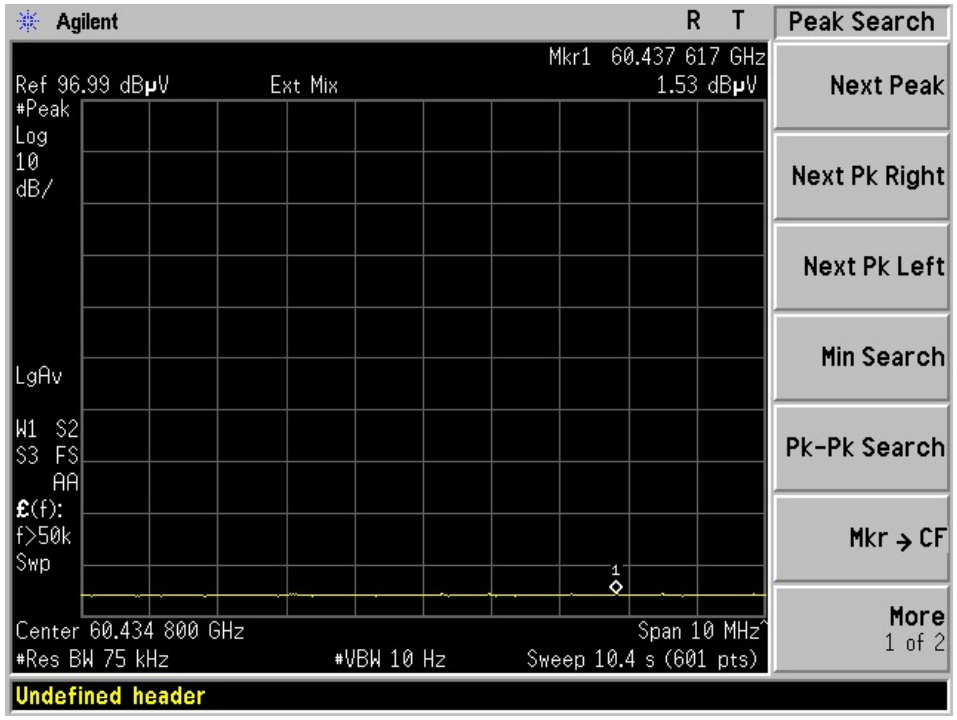
Frequency Range (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Distance Conversion (dB)	Corrected Amplitude (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comment
60-90GHz	10.62	45.8	-13.98	42.44	54	-11.56	Pass

Note: Reduced RBW to show noise floor below average requirements
Note: Above measurement made at distance 0.6meter
Note: Correction Factor includes Antenna Factor (dB/m) + Path Loss(dB)
Note: Corrective Factors are determined by applying
Note: Distance conversion using formula 20*log(x/3m) for converting measurement to the applicable 3meter distance requirement

60 GHz – 90 GHz, Average at peak frequency (no cover)

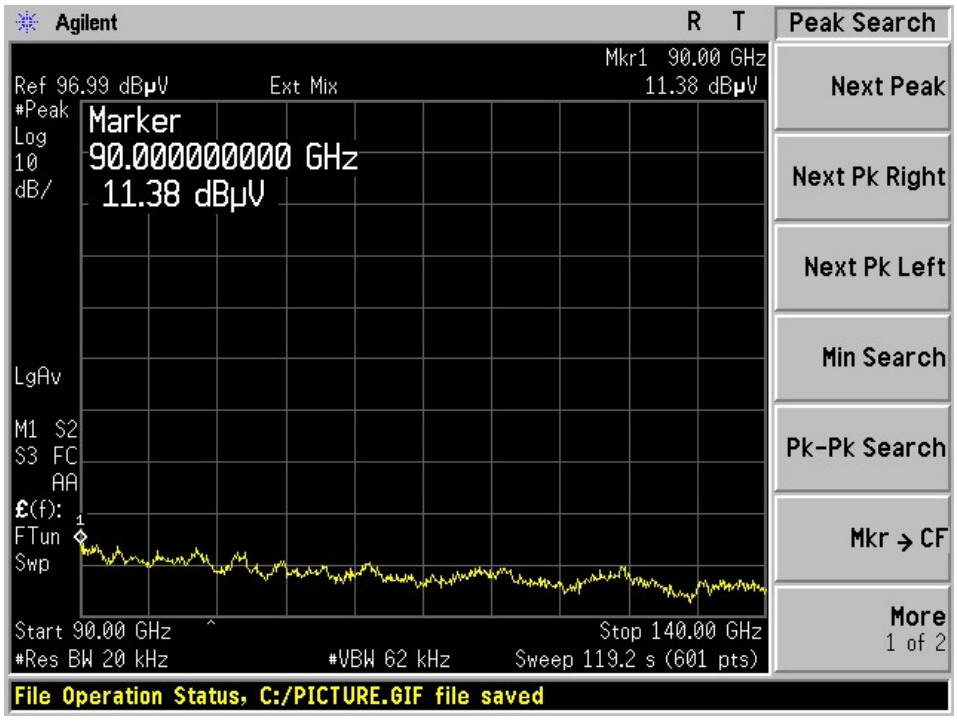


60 GHz – 90 GHz, Average at peak frequency (with cover on)



Note: Upon examination, fundamental at 60GHz is entirely unmeasurable below noise floor with enclosure on

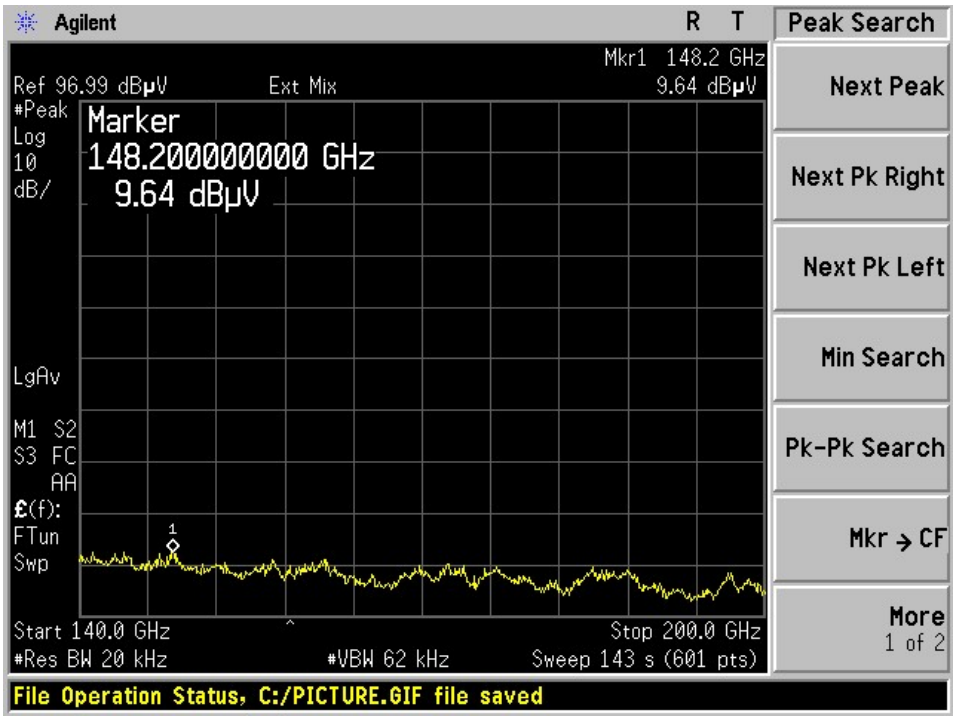
90 GHz- 140 GHz



Frequency Range (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Distance Conversion (dB)	Corrected Amplitude (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comment
90-140GHz	11.38	54.52	-17.5	48.4	54	-5.6	Pass

Note: Reduced RBW to show noise floor below average requirements
Note: Above measurement made at distance 0.4meter
Note: Correction Factor includes Antenna Factor (dB/m) + Path Loss(dB)
Note: Corrective Factors are determined by applying
Note: Distance conversion using formula 20*log(x/3m) for converting measurement to the applicable 3meter distance requirement

140 GHz- 200 GHz



Frequency Range (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Distance Conversion (dB)	Corrected Amplitude (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comment
140-200GHz	9.64	65.24	-21.58	53.3	54	-0.7	Pass

Note: Reduced RBW to show noise floor below average requirements
Note: Above measurement made at distance 0.25meter
Note: Correction Factor includes Antenna Factor (dB/m) + Path Loss(dB)
Note: Corrective Factors are determined by applying
Note: Distance conversion using formula 20*log(x/3m) for converting measurement to the applicable 3meter distance requirement

---END OF REPORT---