FCC Part 15
EMI TEST REPORT

of

E.U.T. : Smartcard Handle
FCC ID. : 2AB3RINFRASOLUTIONM
Model : X-800M, X-800M-R
Working Frequency : 13.56 MHz

for

APPLICANT : AUSTIN HUGHES ELECTRONICS LTD
ADDRESS : Unit 3608-12,Cable TV Tower 9 Hoi Shing Road
Tsuen Wan N T ,Hong Kong

Test Performed by

ELECTRONICS TESTING CENTER, TAIWAN
NO. 34, LIN 5, DING FU TSUN, LINKOU HSIANG
TAIPEI HSIEN, TAIWAN, R.O.C.
Tel : (02)26023052 Fax : (02)26010910
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Report Number : 13-10-RBF-006-02

TEST REPORT CERTIFICATION

Applicant	:	AUSTIN HUGHES ELECTRONICS LTD Unit 3608-12,Cable TV Tower 9 Hoi Shing Road Tsuen Wan N T ,Hong Kong
Manufacture	:	AUSTIN HUGHES ELECTRONICS LTD Unit 3608-12,Cable TV Tower 9 Hoi Shing Road Tsuen Wan N T ,Hong Kong

Description of Device :

a) Type of EUT	:	Smartcard Handle
b) Trade Name	:	AUSTIN HUGHES
c) Model No.	:	X-800M
d) Serial Model	:	X-800M-R
e) Power Supply	:	DC 12V from host device

Regulation Applied : FCC Rules and Regulations Part 15 Subpart C

I HEREBY CERTIFY THAT: The data shown in this report were made in accordance with the procedures given in ANSI C63.4, and the energy emitted by the device was founded to be within the limits applicable. I assume full responsibility for accuracy and completeness of these data.

Note: 1. The result of the testing report relate only to the item tested.
2. The testing report shall not be reproduced expect in full, without the written approval of ETC.

Summary of Tests

Test	Results
Radiated Emission	**Pass**
Frequency Stability	**Pass**
Conducted Emission	**Pass**

Date Test Item Received	:	*Oct. 08, 2013*
Date Test Campaign Completed	:	*Jan. 14, 2014*
Date of Issue	:	*Mar. 06, 2014*

Test Engineer : Jiapeng Chen

(Jiapeng Chen)

Approve & Authorized : S. S. Liou

S. S. Liou, Section Manager
EMC Dept. II of ELECTRONICS
TESTING CENTER, TAIWAN

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1. GENERAL INFORMATION

1.1 Product Description

a) Type of EUT : Smartcard Handle
b) Trade Name : AUSTIN HUGHES
c) Model No. : X-800M
d) Serial Model : X-800M-R
e) Power Supply : DC 12V from host device
f) Model Difference : X-800M and X-800M-R are the same circuit and PCB design. The only difference is the outside case structure. X-800M is design for left side open and X-800M-R is for right side open.

1.2 Characteristics of Device:

Smartcard Handle working on frequency 13.56MHz.

1.3 Test Methodology

Both conducted and radiated emissions were performed according to the procedures illustrated in ANSI C63.4 (2003). Other required measurements were illustrated in separate sections of this test report for details.

1.4 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located on the roof top of Building at No.34, Lin 5, Dingfu Vil., Linkou Dist., New Taipei City, Taiwan 24442, R.O.C.
This site is FCC 2.948 listed and accepted in a letter dated Jan. 29, 2014.
Registration Number: 90589

2. DEFINITION AND LIMITS

2.1 Definition

Intentional radiator:
A device that intentionally generates and emits radio frequency energy by radiation or induction.

2.2 Restricted Bands of Operation

Only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 - 0.110	16.42-16.423	399.9-410	4.5-5.15
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	2655-2900	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	3360-4400	Above 38.6
13.36-13.41			

Remark "**" : Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz

2.3 Limitation

(1) Conducted Emission Limits:

Except as shown in paragraphs (b) and (c) of this section, for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50μH/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

Frequency MHz	**Quasi Peak dB μ V**	**Average dB μ V**
0.15 - 0.5	66-56*	56-46*
0.5 - 5.0	56	46
5.0 - 30.0	60	50

- Decreases with the logarithm of the frequency

(2) Radiated Emission Limits:

According to 15.225, the requirement of radiated emission is:

(a) The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15,848 microvolts/meter at 30 meters.

(b) Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.

(c) Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.

(d) The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.

According to § 15.209 Radiated emission limits, general requirements.
(a) Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequencies (MHz)	Field Strength (microvolts/meter)	Measurement Distance (meters)
0.009 – 0.490	2400/F(kHz)	300
0.490 – 1.705	24000/F(kHz)	30
1.705 – 30.0	30	30
30 – 88	100 **	3
88 – 216	150 **	3
216 – 960	200 **	3
Above 960	500	3

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As shown in 15.35(b), for frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits, specified above by more than 20 dB under any condition of modulation.

(3) Frequency Stability Limit:

According to 15.225, the requirement of frequency stability is:

(e) The frequency tolerance of the carrier signal shall be maintained within +/- 0.01% of the operating frequency over a temperature variation of –20 degrees to +50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performe using a new battery.

2.4 Labeling Requirement

The device shall bear the following statement in a conspicuous location on the device :

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

2.5 User Information

The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

3 SYSTEM TEST CONFIGURATION

3.1 Justification

All measurement were intentional to maximum the emissions from EUT by varying the connection cables, therefore, the test result is sure to meet the applicable requirement.

3.2 Devices for Tested System

Device	Manufacture	Model / FCC ID.	Description
Smartcard Handle *	AUSTIN HUGHES ELECTRONICS LTD	X-800M / 2AB3RINFRASOLUTIONM	5m unshielded RS-232 cable 3m unshielded sensor cable
InfraBox	AUSTIN HUGHES ELECTRONICS LTD	X-2000	1.8m unshielded power cord

Remark "*" means equipment under test.

4. RADIATED EMISSION MEASUREMENT

4.1 Applicable Standard

According to 15.225, the requirement of radiated emission is:

(a) The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15,848 microvolts/meter at 30 meters.

(b) Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.

(c) Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.

(d) The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.

4.2 Measurement Procedure

1. Setup the configuration per figure 1 and 2 for frequencies measured below and above 1 GHz respectively.

2. For emission frequencies measured below 1 GHz, a pre-scan is performed in a shielded chamber to determine the accurate frequencies of higher emissions will be checked on an open test site. As the same purpose, for emission frequencies measured above 1 GHz, a pre-scan also be performed with a 1 meter measuring distance before final test.

3. For emission frequencies measured below and above 1 GHz, set the spectrum analyzer on a 100 kHz and 1 MHz resolution bandwidth respectively for each frequency measured in step 2.

4. The search antenna is to be raised and lowered over a range from 1 to 4 meters in horizontally polarized orientation. Position the highness when the highest value is indicated on spectrum analyzer, then change the orientation of EUT on test table over a range from 0° to 360° with a speed as slow as possible, and keep the azimuth that highest emission is indicated on the spectrum analyzer. Vary the antenna position again and record the highest value as a final reading. A RF test receiver is also used to confirm emissions measured.

5. Repeat step 4 until all frequencies need to be measured were complete.

6. Repeat step 5 with search antenna in vertical polarized orientations.

7. Check the three frequencies of highest emission with varying the placement of cables associated with EUT to obtain the worse case and record the result.

Figure 1 : Frequencies measured below 30 MHz configuration

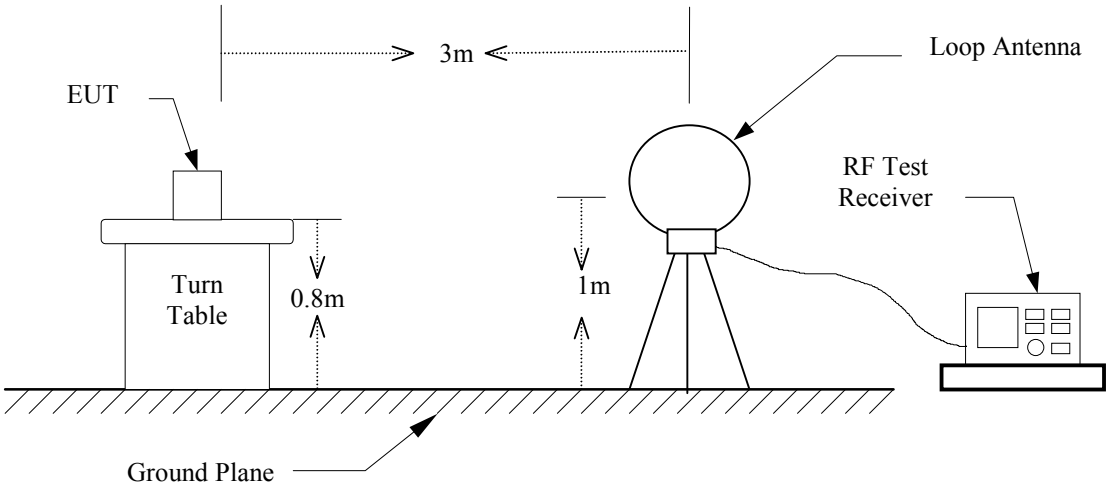
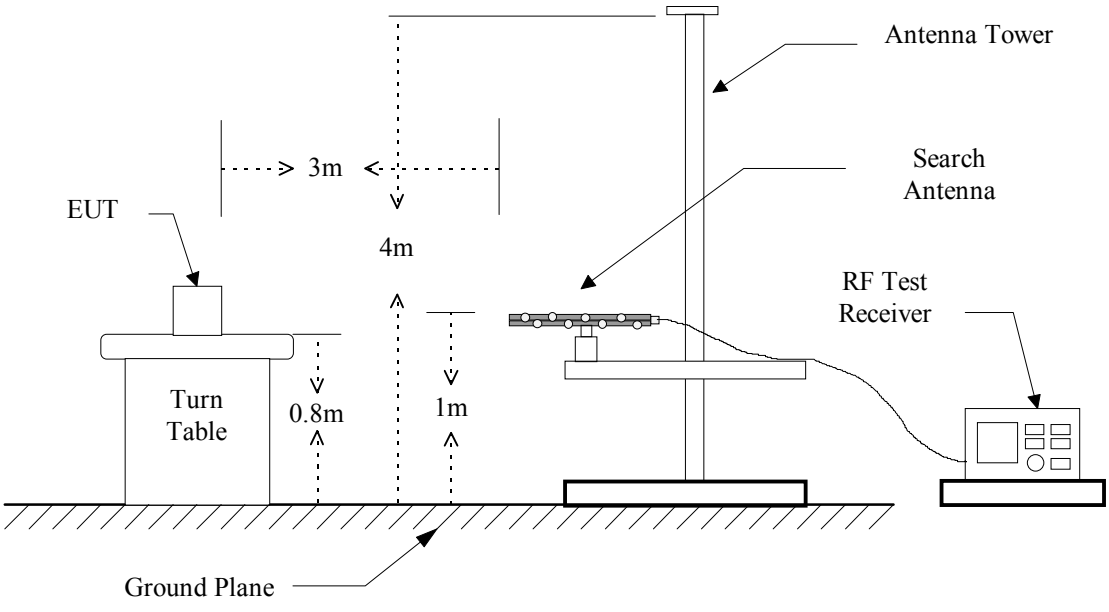


Figure 2 : Frequencies measured above 30 MHz configuration



4.3 Test Data

4.3.1 Below 30MHz

Operation Mode : Transmitting

Test Date : Jan. 14, 2014 Temperature : 20 °C Humidity : 60 %

Frequency (MHz)	Meter Reading (dBuV)	Corrected Factor (dB)	Amplifier (dB)	Result @3m (dBuV/m)	Result @30m (dBuV/m)	Limit @30m (dBuV/m)
13.560	57.0	34.9	28.0	63.9	23.9	84.0
27.120	---	---	---	---	---	29.5

Frequency (MHz)	Meter Reading (dBuV)	Corrected Factor (dB)	Amplifier (dB)	Result @3m (dBuV/m)	Result @30m (dBuV/m)	Limit @30m (dBuV/m)
13.410 ~ 13.553	---	---	---	---	---	50.5
13.567 ~ 13.710	---	---	---	---	---	50.5
13.110 ~ 13.410	---	---	---	---	---	40.5
13.710 ~ 14.010	---	---	---	---	---	40.5

Note :

1. *Result = Reading + C. Factor*
2. *If the result of peak value is under the limit of Quasi-Peak, the Quasi-Peak value doesn't need to be measured.*
3. *Remark "---" means that the emissions level is too low to be measured.*
4. *With a distant extrapolation of 40log(30m/3m) on the offset level of receiver during the test.*

Limit Calculation:

Fundamental (§15.225(a)) : 20 log (15848) = 84.0 dBuV/m @30m

Harmonic < 30MHz (§15.225(d)) : 20 log (30) = 29.5 dBuV/m @30m

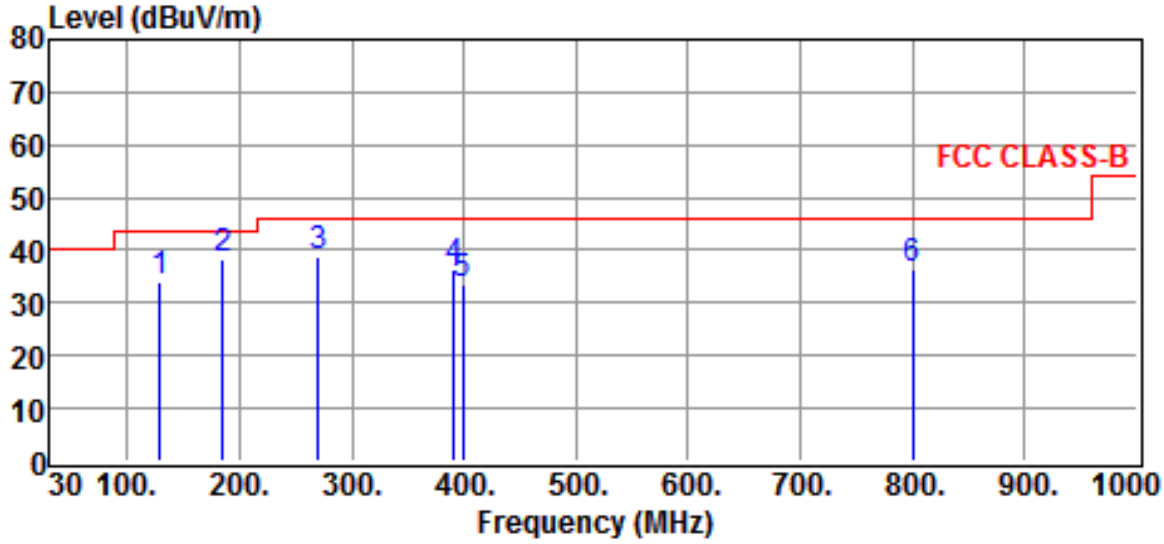
Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz:

20 log (334) = 50.5 dBuV/m @30m

Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz:

20 log (106) = 40.5 dBuV/m @30m

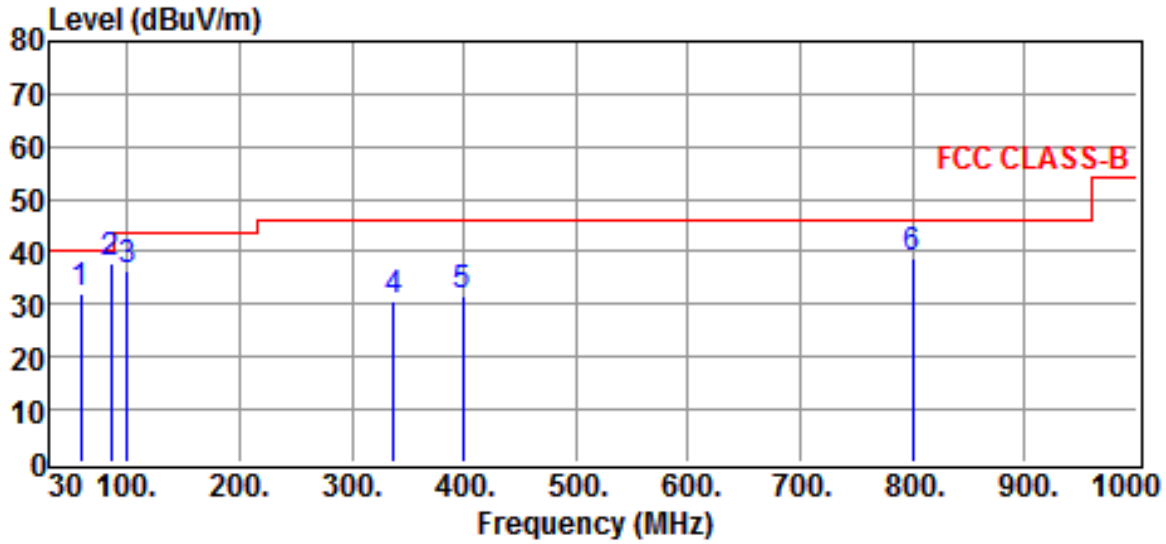
4.3.2 30MHz – 1GHz



Site	:Open Site	Date	:2014-01-14
Limit	:FCC CLASS-B	Ant. Pol.	:HORIZONTAL
EUT	:Smartcard Handle	Temp.	:20°C
Power Rating	:DC 12V from host device	Humi.	:62%
Model	:X-800M	Engineer.	:Jiapeng
Test Mode	:TX Other Emissions		
Test Mode	:		

Freq MHz	Reading dBuV	Correction Factor dB	Result dBuV/m	Limits dBuV/m	Over limit dB	Detector
128.6500	21.2	12.8	34.0	43.5	-9.5	QP
185.5400	22.9	15.4	38.3	43.5	-5.2	QP
270.3800	23.1	15.5	38.6	46.0	-7.4	QP
391.7000	17.6	18.9	36.5	46.0	-9.5	QP
399.4000	14.2	19.1	33.3	46.0	-12.7	QP
800.5000	10.1	26.4	36.5	46.0	-9.5	QP

Note :
1. Result = Reading + Corrected Factor
2. Corrected Factor = Antenna Factor + Cable Loss
3. The margin value=Limit - Result



Site	:Open Site	Date	:2014-01-14
Limit	:FCC CLASS-B	Ant. Pol.	:VERTICAL
EUT	:Smartcard Handle	Temp.	:20°C
Power Rating	:DC 12V from host device	Humi.	:62%
Model	:X-800M	Engineer.	:Jiapeng
Test Mode	:TX Other Emissions		
Test Mode	:		

Freq MHz	Reading dBuV	Correction Factor dB	Result dBuV/m	Limits dBuV/m	Over limit dB	Detector
58.7300	20.9	11.4	32.3	40.0	-7.7	QP
85.8300	27.1	10.8	37.9	40.0	-2.1	QP
100.1900	25.1	11.4	36.5	43.5	-7.0	QP
337.8000	12.8	17.7	30.5	46.0	-15.5	QP
399.4000	12.6	19.1	31.7	46.0	-14.3	QP
800.5000	12.3	26.4	38.7	46.0	-7.3	QP

Note :
1. Result = Reading + Corrected Factor
2. Corrected Factor = Antenna Factor + Cable Loss
3. The margin value=Limit - Result

4.4 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. For the limit is employed average value, therefore the peak value can be transferred to average value by subtracting the duty factor. The basic equation with a sample calculation is as follows:

Result = Reading + Corrected Factor

where

Corr. Factor = Antenna Factor + Cable Factor - Amplifier Gain (if any)

4.5 Radiated Test Equipment

Equipment	Manufacturer	Model No.	Calibration Date	Next Cal. Date
Test Receiver	Rohde & Schwarz	ESVS30	2013/05/06	2014/05/05
Bi-Log Antenna	ETC	MCTD 2756	2013/01/17	2014/01/17
Log-periodic Antenna	EMCO	3146	2013/10/25	2014/10/24
Biconical Antenna	EMCO	3110	2013/10/25	2014/10/24
Spectrum	R&S	FSP3	2013/04/05	2014/04/04
Amplifier	HP	8447D	2013/05/03	2014/05/02
EMI Test Receiver	Rohde & Schwarz	ESU 40	2013/09/24	2014/09/23
Double Ridged Antenna	EMCO	3115	2013/04/29	2014/04/28
LOOP Antenna	EMCO	6512	2013/09/30	2014/09/29

4.8 Measuring Instrument Setup

Explanation of measuring instrument setup in frequency band measured is as following :

Frequency Band (MHz)	Instrument	Function	Resolution bandwidth	Video Bandwidth
0.009 to 30	RF Test Receiver	Quasi-Peak	10 kHz	N/A
	Spectrum Analyzer	Peak	10 kHz	30 kHz
30 to 1000	RF Test Receiver	Quasi-Peak	120 kHz	N/A
	Spectrum Analyzer	Peak	100 kHz	100 kHz

4.9 Radiated Measurement Photos

5 FREQUENCY STABILITY MEASUREMENT

5.1 Provisions Applicable

According to sec. 15.225(e) the frequency tolerance of the carrier signal shall be maintained within +/- 0.01% of the operating frequency over a temperature variation of –20 degrees to +50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery.

5.2 Measurement Procedure

A) Frequency stability versus environmental temperature

1. Setup the configuration per figure 3 for frequencies measured at an environmental chamber set for a temperature of 20°C.

2. Turn on EUT and set SA center frequency to the right frequency needs to be measured. Then set SA RBW to 30 kHz, VBW to 100kHz and frequency span to 500 kHz. Record this frequency to be a reference.

3. Set the temperature of chamber to 50°C. Allow sufficient time (approximately 30 min) for the temperature of the chamber to stabilize. While maintaining a constant temperature inside the chamber, turn the EUT on and measure the EUT operating frequency.

4. Repeat step 2 with a 10°C decreased per stage until the lowest temperature -20°C is measured, record all measurement frequencies.

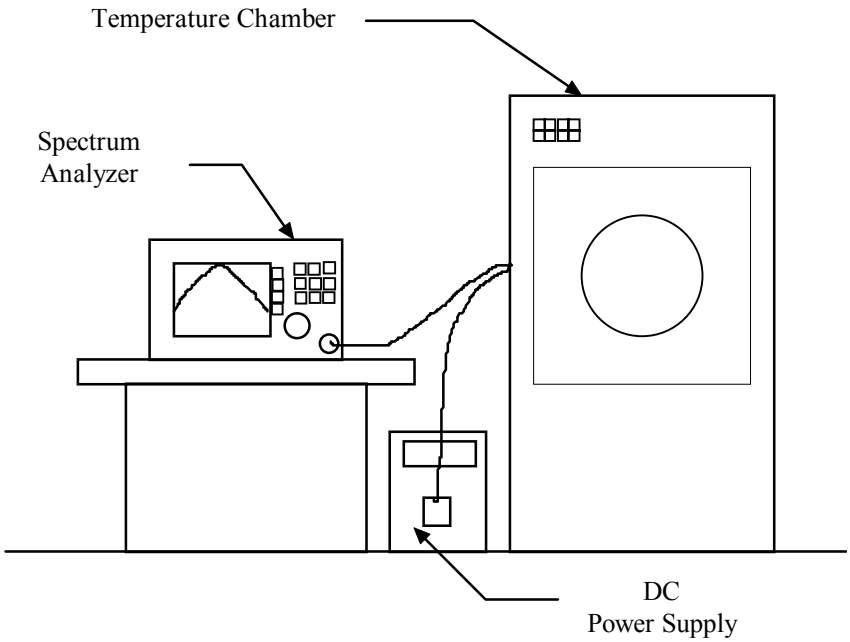
B) Frequency stability versus input voltage

1. Setup the configuration per figure 3 for frequencies measured at an environmental chamber set for a temperature of 20°C.

2. Set SA center frequency to the right frequency needs to be measured. Then set SA RBW to 30 kHz, VBW to 100kHz and frequency span to 500 kHz. Record this frequency to be a reference.

3. The EUT is powered with the DC Power Supply, supplied it with 85% and 115% voltage, and measured the EUT operating frequency.

Figure 3 : Frequency stability measurement configuration



5.3 Measurement Instrument

Equipment	Manufacturer	Model No.	Calibration Date	Next Cal. Date
Spectrum Analyzer	HP	8564E	2013/05/21	2014/05/20
Temperature Chamber	MALLIER	MCT-2X-M	2013/05/02	2014/05/01

5.4 Measurement Data

A1. Frequency stability versus enviroment tempture

Reference Frequency : 13.56 MHz		Limit：0.01%					
Enviroment Tempture (°C)	Power Supplied (Vac)	Frequency measured with time elapsed					
		2 minute		5 minute		10 minute	
		(MHz)	(%)	(MHz)	(%)	(MHz)	(%)
50	120	13.5607	0.00501	13.5593	-0.00526	13.5602	0.00154
40		13.5602	0.00118	13.5607	0.00546	13.5606	0.00449
30		13.5601	0.00083	13.5599	-0.00038	13.5600	-0.00014
20		13.5599	-0.00082	13.5605	0.00383	13.5604	0.00274
10		13.5597	-0.00215	13.5607	0.00522	13.5606	0.00430
0		13.5597	-0.00229	13.5606	0.00408	13.5610	0.00759
-10		13.5603	0.00228	13.5605	0.00341	13.5600	0.00032
-20		13.5606	0.00453	13.5602	0.00125	13.5598	-0.00175

A2. Frequency stability versus input voltage (±15%)

Reference Frequency : 13.56 MHz		Limit：0.01%					
Enviroment Tempture (°C)	Power Supplied (Vac)	Frequency measured with time elapsed					
		2 minute		5 minute		10 minute	
		(MHz)	(%)	(MHz)	(%)	(MHz)	(%)
20	102	13.5597	-0.00196	13.5601	0.00094	13.5605	0.00393
20	138	13.5610	0.00719	13.5591	-0.00648	13.5602	0.00156

6. CONDUCTED EMISSION MEASUREMENT

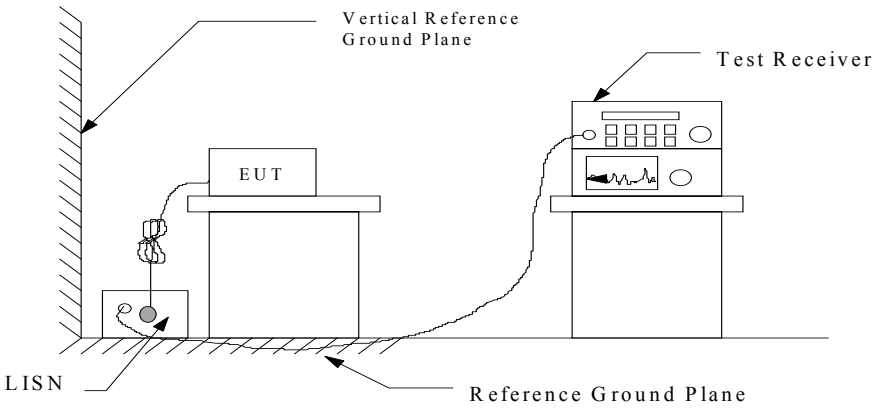
6.1 Standard Applicable

For unintentional and intentional device, Line Conducted Emission Limits are in accordance to §15.107(a) and §15.207(a) respectively. Both Limits are identical specification.

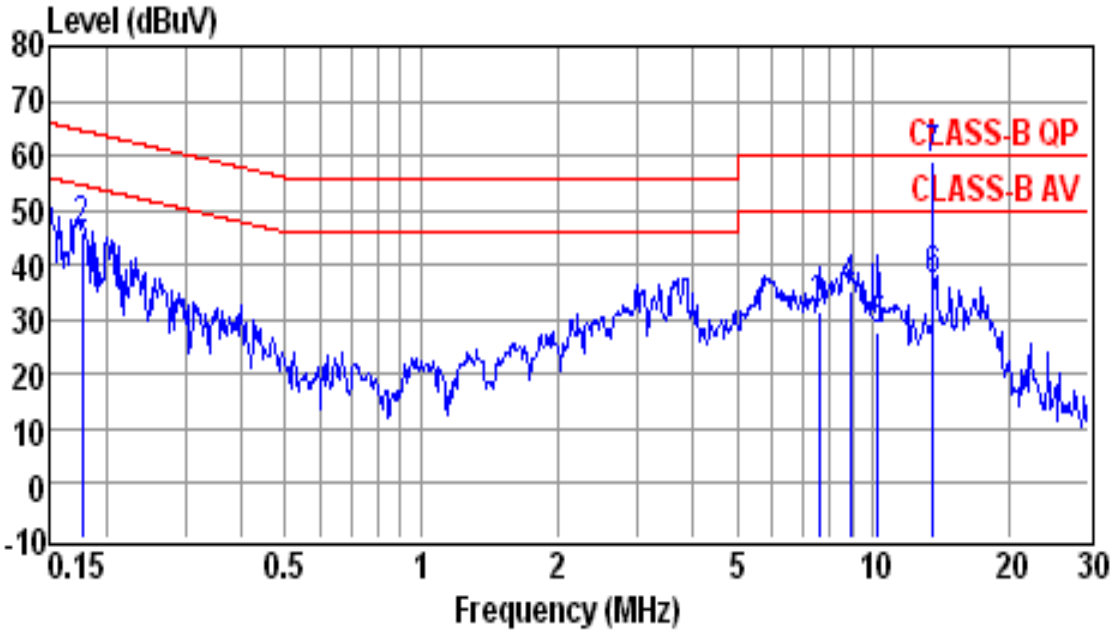
6.2 Measurement Procedure

1. Setup the configuration per figure 4.
2. A preliminary scan with a spectrum monitor is performed to identify the frequency of emission that has the highest amplitude relative to the limit by operating the EUT in selected modes of operation, typical cable positions, and with a typical system configuration.
3. Record the 6 or 8 highest emissions relative to the limit.
4. Measure each frequency obtained from step 3 by a test receiver set on quasi peak detector function, and then record the accuracy frequency and emission level. If all emissions measured in the specified band are attenuated more than 20 dB from the limit, this step would be ignored, and the peak detector function would be used.
5. Confirm the highest three emissions with variation of the EUT cable configuration and record the final data.
6. Repeat all above procedures on measuring each operation mode of EUT.

Figure 4 : Conducted emissions measurement configuration



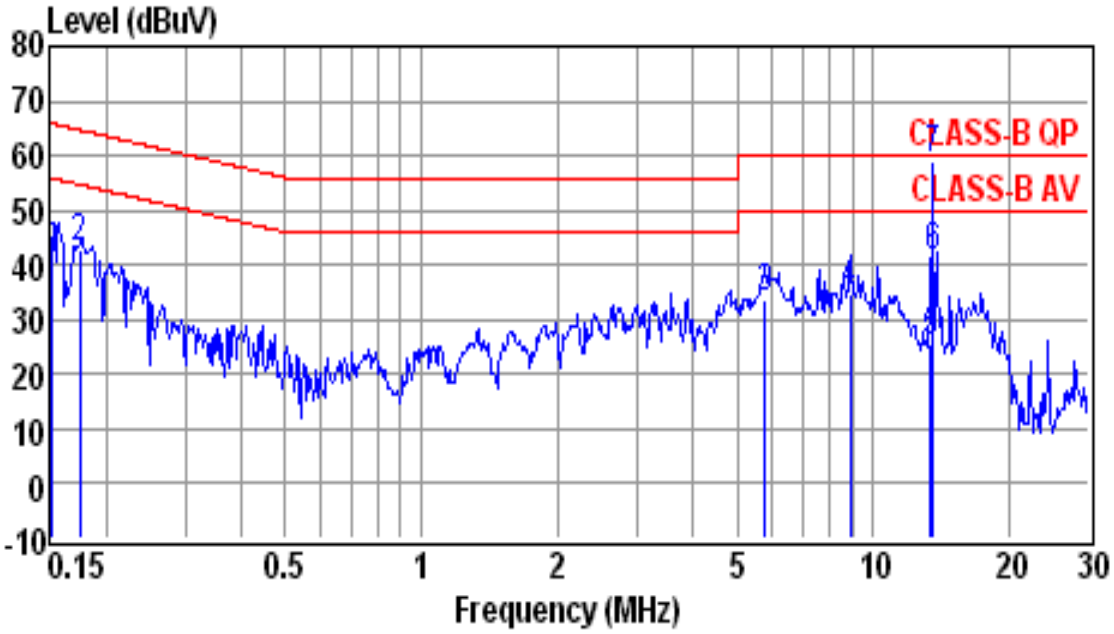
6.3 Conducted Emission Data



Site	: conducted #1	Date	: 10-16-2013
Condition	: CLASS-B QP	LISN	: NEUTRAL
Tem / Hum	: 23 ℃ / 60%	Test Mode	: Tx
EUT	: X-800M	Power Rating	: 120V/60Hz to host device
Memo	:	Memo	:

Freq (MHz)	Reading (dBuV)	Factor (dB)	Emission Level (dBuV)	Limit Line (dBuV)	Over Limit (dB)	Remark
0.1500	39.0	10.3	49.3	66.0	-16.7	QP
0.1777	35.7	10.3	46.0	64.6	-18.6	QP
7.6060	21.1	10.6	31.7	60.0	-28.3	QP
8.9160	24.8	10.6	35.4	60.0	-24.6	QP
10.2330	17.2	10.6	27.8	60.0	-32.2	QP
13.5600	26.2	10.7	36.9	50.0	-13.1	Average
13.5600	48.3	10.7	59.0	60.0	-1.0	QP

Note :
1. Result = Reading + Factor
2. Factor = LISN Factor + Cable Loss



Site	: conducted #1	Date	: 10-16-2013
Condition	: CLASS-B QP	LISN	: LINE
Tem / Hum	: 23 ℃ / 60%	Test Mode	: Tx
EUT	: X-800M	Power Rating	: 120V/60Hz to host device
Memo	:	Memo	:

Freq (MHz)	Reading (dBuV)	Factor (dB)	Emission Level (dBuV)	Limit Line (dBuV)	Over Limit (dB)	Remark
0.1516	35.0	10.3	45.3	65.9	-20.6	QP
0.1758	32.3	10.3	42.6	64.7	-22.1	QP
5.7740	23.2	10.5	33.7	60.0	-26.3	QP
8.9160	23.9	10.6	34.5	60.0	-25.5	QP
13.4080	14.6	10.8	25.4	60.0	-34.6	QP
13.5600	30.5	10.8	41.3	50.0	-8.7	Average
13.5600	48.0	10.8	58.8	60.0	-1.2	QP

Note :
1. Result = Reading + Factor
2. Factor = LISN Factor + Cable Loss

6.4 Result Data Calculation

The result data is calculated by adding the LISN Factor to the measured reading. The basic equation with a sample calculation is as follows:

RESULT = READING + LISN FACTOR

Assume a receiver reading of 22.5 dB μ V is obtained, and LISN Factor is 0.1 dB, then the total of field strength is 22.6 dB μ V.

RESULT = 22.5 + 0.1 = 22.6 dB μ V
Level in μ V = Common Antilogarithm[(22.6 dB μ V)/20]
= 13.48 μ V

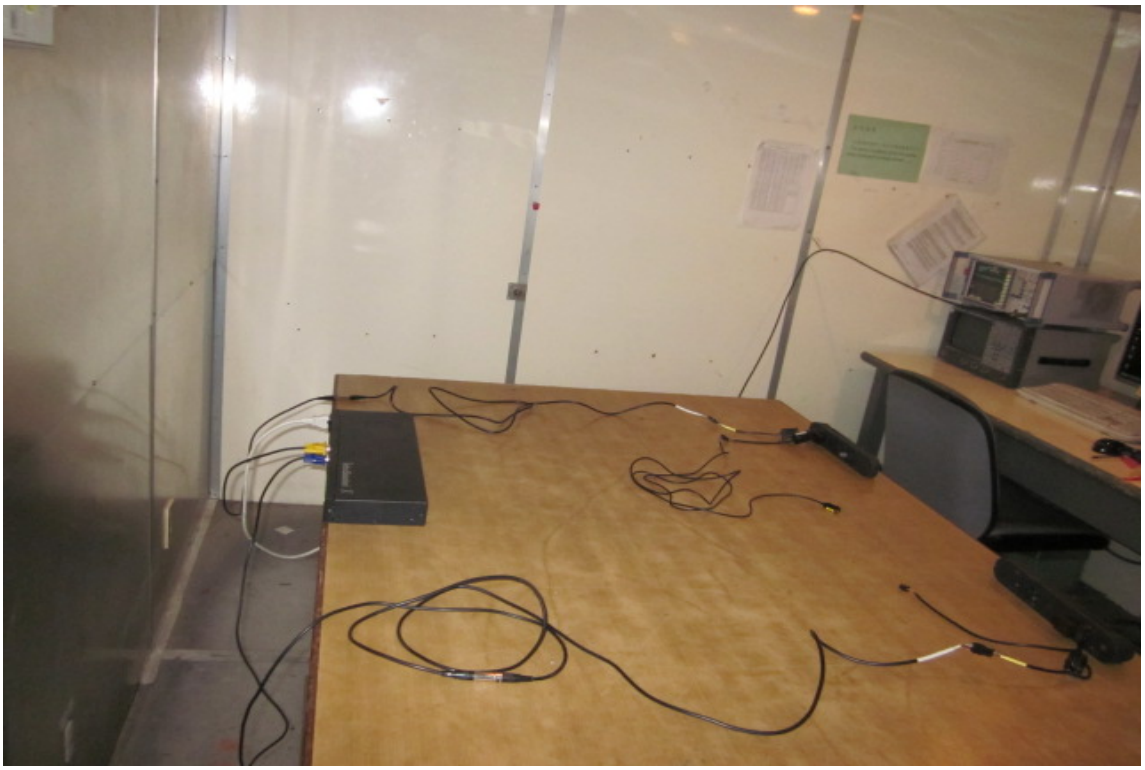
6.5 Conducted Measurement Equipment

The following test equipment are used during the conducted test .

Equipment	Manufacturer	Model No.	Calibration Date	Next Cal. Date
EMI Test Receiver	Rohde & Schwarz	ESCI	2013/08/02	2014/08/01
LISN	EMCO	3625/2	2013/05/07	2014/05/06
LISN	Rohde & Schwarz	ESH2-Z5	2013/04/12	2014/04/11

Note: The standards used to perform this calibration are traceable to NML/ROC and NIST/USA.

6.6 Photos of Conduction Measuring Setup



7 ANTENNA REQUIREMENT

7.1 Standard Applicable

According to §15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device.

7.2 Antenna Construction

The antenna is permanently attached to the main PCB, no consideration of replacement.

Please see photos submitted in Exhibit B.