

# Wireless test report 383829 – 2R1TRFWL

Applicant:	
Interaxon Inc.	
Product type:	
Brain Activity Sens	ng Device
Model:	
MS-01	
FCC ID:	IC Registration number:
2ABZI-MS01	11834A-MS01
Specifications:	
<ul><li>FCC 47 CFR Par</li></ul>	15 Subpart C, §15.247
	902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz
♦ RSS-247. Issue	, Feb 2017, Section 5
·	on Systems (DTSs), Frequency Hopping Systems (FHSs)
_	pt Local Area Network (LE-LAN) Devices
	cications for frequency hopping systems and digital transmission systems operating in the
bands 902–928 ľ	Hz, 2400–2483.5 MHz and 5725–5850 MHz
Date of issue: February 26, 20	20
Mark Libbrecht, EMC Speciali	
Tested by	Signature 0 1 1
	Andrey Adelberg
Andrey Adelberg, Senior Wire	ess/EMC Specialist / / /
Reviewed by	Signature

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### Test location(s)

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Site number (3 m SAC)	FCC/IC: CA0101

### 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 contain in this report are within Nemko Canada's ISO/IEC 17025 accreditation.

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# Section 1. Report summary

## 1.1 Applicant and manufacturer

Company name	Interaxon Inc.
Address	555 Richmond St. W #900
City	Toronto
Province/State	Ontario
Postal/Zip code	M5V 3B1
Country	Canada

### 1.2 Test specifications

FCC 47 CFR Part 15, Subpart C, Clause 15.247	Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz
RSS-247, Issue 2, Feb 2017, Section 5	Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices

### 1.3 Test methods

558074 D01 15.247 Meas Guidance v05r02 (April 2, 2019)	Guidance for compliance measurements on digital transmission system, frequency hopping spread spectrum system, and hybrid system devices operating under section 15.247 of the FCC rules.
ANSI C63.10 v2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
RSS-Gen, Issue 5 Amendment 1, March 2019	General Requirements for Compliance of Radio Apparatus

### 1.4 Statement of compliance

In the configuration tested, the EUT was found compliant.

Testing was performed against all relevant requirements of the test standard except as noted in section 1.5 below. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See "Summary of test results" for full details.

### 1.5 Exclusions

None

# 1.6 Test report revision history

Revision #	Date of issue	Details of changes made to test report
TRF	November 7, 2019	Original report issued
1RTRF	February 10, 2020	Update model page 1, emission data page 7, theory page 8, channel page 16
2RTRF	February 26, 2020	Section 3.5 updated with EUT exercise details

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# **Section 2.** Summary of test results

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

Table 2.1-1: FCC general requirements results

Part	Test description	Verdict
§15.207(a)	Conducted limits	Not applicable
§15.31(e)	Variation of power source	Not applicable
§15.31(m)	Number of tested frequencies	Pass
§15.203	Antenna requirement	Pass

Notes: EUT is a battery operated device, the testing was performed using fresh batteries.

# 2.2 FCC Part 15 Subpart C, intentional radiators test results for digital transmission systems (DTS)

Table 2.2-1: FCC 15.247 results for DTS

Part	Test description	Verdict
§15.247(a)(2)	Minimum 6 dB bandwidth	Pass
§15.247(b)(3)	Maximum peak output power in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands	Pass
§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	Pass
§15.247(f)	Time of occupancy for hybrid systems	Not applicable



### 2.3 ISED RSS-Gen, Issue 5, test results

Table 2.3-1: RSS-Gen results

Part	Test description	Verdict
7.3	Receiver radiated emission limits	Not applicable
7.4	Receiver conducted emission limits	Not applicable
6.9	Operating bands and selection of test frequencies	Pass
8.8	AC power-line conducted emissions limits	Not applicable

Notes: <sup>1</sup>According to sections 5.2 and 5.3 of RSS-Gen, Issue 5 the EUT does not have a stand-alone receiver neither scanner receiver, therefore exempt from receiver requirements.

EUT is a battery operated device, the testing was performed using fresh batteries.

# 2.4 ISED RSS-247, Issue 2, test results for digital transmission systems (DTS)

Table 2.4-1: RSS-247 results for DTS

Part	Test description	Verdict
5.2 (a)	Minimum 6 dB bandwidth	Pass
5.2 (b)	Maximum power spectral density	Pass
5.3	Hybrid Systems	
5.3 (a)	Digital modulation turned off	Not applicable
5.3 (b)	Frequency hopping turned off	Not applicable
5.4	Transmitter output power and e.i.r.p. requirements	
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	Unwanted emissions	Pass

Notes: None



# Section 3. Equipment under test (EUT) details

# 3.1 Sample information

Receipt date	October 17, 2019
Nemko sample ID number	#1 (radiated), #2 (conducted)

# 3.2 EUT information

Product type	Brain Activity Sensing Device
Model	MS-01
Serial number	5000-0JPB-A062 (radiated), 5000-WKYA-A061 (conducted)

# 3.3 Technical information

Applicant IC company number	11834A
IC UPN number	MS01
All used IC test site(s) Reg. number	2040A-4
RSS number and Issue number	RSS-247 Issue 2, Feb 2017
Frequency band	2400–2483.5 MHz
Frequency Min (MHz)	2402
Frequency Max (MHz)	2480
RF power Max (W), Conducted	0.000468 (-3.3 dBm)
Field strength, dBµV/m @ 3 m	N/A
Measured BW (kHz), 99% OBW	1035
Type of modulation	GFSK
Emission classification (F1D, G1D, D1D)	F1D
Transmitter spurious, dBμV/m @ 3 m	41.1 @ 2484 MHz
Power requirements	3.7 V <sub>DC</sub> , 130 mAh battery
Antenna information	0.5 dBi (peak gain)
	Manufacturer: Johansson
	Model: 2450AT18B100
	Type: SMD ceramic antenna.





# 3.4 Product description and theory of operation

EUT uses a BLE module operating 2402 – 2480 MHz. For further information please refer to operational description.

# 3.5 EUT exercise details

EUT was connected to a laptop via a USB to MicroUSB cable. The laptop was used to program the EUT using BlueNRG GUI V2.60 firmware provided by the customer. Power level = 5 (+2 dBm) used for all channels during testing.



# 3.6 EUT setup diagram

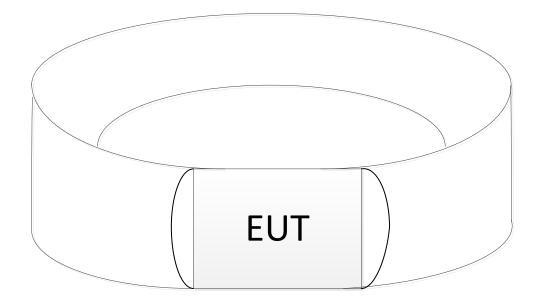


Figure 3.6-1: Setup diagram

# 3.7 EUT sub assemblies

Table 3.7-1: EUT sub assemblies

Description	Brand name	Model/Part number	Serial number
Brain sensing headband	None	None	037





# **Section 4.** Engineering considerations

### 4.1 Modifications incorporated in the EUT

There were no modifications performed to the EUT during this assessment.

### 4.2 Technical judgment

None

# 4.3 Deviations from laboratory tests procedures

No deviations were made from laboratory procedures.



# **Section 5.** Test conditions

## 5.1 Atmospheric conditions

Temperature	15–30 °C
Relative humidity	20–75 %
Air pressure	860–1060 mbar

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

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 ±5 %, for which the equipment was designed.



# Section 6. Measurement uncertainty

## 6.1 Uncertainty of measurement

UKAS Lab 34 and TIA-603-B have been used as guidance for measurement uncertainty reasonable estimations with regards to previous experience and validation of data. Nemko Canada, Inc. follows these test methods in order to satisfy ISO/IEC 17025 requirements for estimation of uncertainty of measurement for wireless products.

Measurement uncertainty budgets for the tests are detailed below. Measurement uncertainty calculations assume a coverage factor of K = 2 with 95% certainty.

Table 6.1-1: Measurement uncertainty

Test name	Measurement uncertainty, dB
All antenna port measurements	0.55
Conducted spurious emissions	1.13
Radiated spurious emissions	3.78
AC power line conducted emissions	3.55



# **Section 7.** Test equipment

# 7.1 Test equipment list

Table 7.1-1: Equipment list

Equipment	Manufacturer	Model no.	Serial no.	Asset no.	Cal./Ver. cycle	Next cal./ver.
3 m EMI test chamber	TDK	SAC-3		FA003012	1 year	Nov. 19/19
Flush mount turntable	SUNAR	FM2022		FA003006	_	NCR
Controller	SUNAR	SC110V	050118-1	FA002976	_	NCR
Antenna mast	SUNAR	TLT2	042418-5	FA003007	_	NCR
Receiver/spectrum analyzer	Rohde & Schwarz	ESR26	101367	FA002969	1 year	June 4/20
Spectrum analyzer	Rohde & Schwarz	FSW43	104437	FA002971	1 year	June 21/20
Horn antenna (1–18 GHz)	ETS-Lindgren	3117	00052793	FA002911	1 year	Sept 11/20
Preamp (1–18 GHz)	ETS-Lindgren	124334	00224880	FA002956	1 year	Sept 26/20
Bilog antenna (30–2000 MHz)	SUNAR	JB1	A053018-2	FA003009	1 year	Dec. 6/19
50 Ω coax cable	Huber + Suhner	None	457630	FA003047	1 year	Nov 12/19
50 Ω coax cable	Huber + Suhner	None	457624	FA003044	1 year	Nov 12/19
AC Power source	Chroma	61605	616050002253	FA003034	_	VOU
Filter 2.4 – 2.4835 GHz	Microwave Circuits	N0324413	499781	FA003027	1 year	Oct. 1/20
Horn antenna (18-25 GHz)	ETS-Lindgren	3116B	00122305	FA001847	1 year	July 7/20

Note: NCR - no calibration required, VOU - verify on use



Testing data

FCC 15.31(e) Variation of power source

FCC Part 15 Subpart A

# Section 8. Testing data

8.1 F	CC 15.31(e) Variation of power source			
8.1.1	Definitions and limits			
emission	ntional radiators, measurements of the variation of the input power or the radiated signal level of the same as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the same as a performent, the equipment tests shall be performed using a new battery.		•	· ·
8.1.2	Test date			
Start date	October 17, 2019			
8.1.3	Observations, settings and special notes			
a) b) c) d)	where the device is intended to be powered from an external power adapter, the voltage variati provided with the device at the time of sale. If the device is not marketed or sold with a specific a used.  For devices where operating at a supply voltage deviating ±15% from the nominal rated value may test to minimum and maximum allowable voltage per manufacturer's specification and documer For devices with wide range of rated supply voltage, test at 15% below the lowest and 15% above voltage.  For devices obtaining power from an input/output (I/O) port (USB, firewire, etc.), a test jig is necessary-operated equipment, the equipment tests shall be performed using a variable power supply.  Test data	adapter, th ay cause da at in the re e the highe	en a typica amages or l port. est declared	al power adapter shall be loss of intended function,
EUT Powe	r requirements:  If EUT is an AC or a DC powered, was the noticeable output power variation observed?  If EUT is battery operated, was the testing performed using fresh batteries?  If EUT is rechargeable battery operated, was the testing performed using fully charged batteries?	☐ AC ☐ YES ☐ YES ☑ YES	□ DC □ NO □ NO □ NO	⊠ Battery ⊠ N/A ⊠ N/A □ N/A



Testing data

FCC 15.31(m) and RSS-Gen 6.9 Number of frequencies FCC Part 15 Subpart A and RSS-Gen, Issue 5

### 8.2 FCC 15.31(m) and RSS-Gen 6.9 Number of frequencies

### 8.2.1 Definitions and limits

#### FCC:

Measurements on intentional radiators or receivers shall be performed and, if required, reported for each band in which the device can be operated with the device operating at the number of frequencies in each band specified in the following table.

#### ISFD:

Except where otherwise specified, measurements shall be performed for each frequency band of operation for which the radio apparatus is to be certified, with the device operating at the frequencies in each band of operation shown in table below. The frequencies selected for measurements shall be reported in the test report.

Table 8.2-1: Frequency Range of Operation

Frequency range over which the device operates (in each band)	Number of test frequencies required	Location of measurement frequency inside the operating frequency range
1 MHz or less	1	Center (middle of the band)
1–10 MHz	2	1 near high end, 1 near low end
Greater than 10 MHz	3	1 near high end, 1 near center and 1 near low end

Note: "near" means as close as possible to or at the centre / low end / high end of the frequency range over which the device operates.

### 8.2.2 Test date

Start date October 17, 2019

### 8.2.3 Observations, settings and special notes

### Per ANSI C63.10 Subclause 5.6.2.1:

The number of channels tested can be reduced by measuring the center channel bandwidth first and then applying the following relaxations as appropriate:

- a) For each operating mode, if the measured channel bandwidth on the middle channel is at least 150% of the minimum permitted bandwidth, then it is not necessary to measure the bandwidth on the high and low channels.
- b) For multiple-input multiple-output (MIMO) systems, if the measured channel bandwidth on testing the middle channel exceeds the minimum permitted bandwidth by more than 50% on one transmit chain, then it is not necessary to repeat testing on the other chains.
- c) If the measured channel bandwidth on the middle channel is less than 50% of the maximum permitted bandwidth, then it is not necessary to measure the bandwidth on the high and low channels.

### Per ANSI C63.10 Subclause 5.6.2.2:

For devices with multiple operating modes, measurements on the middle channel can be used to determine the worst-case mode(s). The worst-case modes are as follows:

- a) Band edge requirements—Measurements on the mode with the widest bandwidth can be used to cover the same channel (center frequency) on modes with narrower bandwidth that have the same or lower output power for each modulation family (e.g., OFDM and direct sequence spread spectrum).
- b) Spurious emissions—Measure the mode with the highest output power and the mode with the highest output power spectral density for each modulation family (e.g., OFDM and direct sequence spread spectrum).
- c) In-band PSD—Measurements on the mode with the narrowest bandwidth can be used to cover all modes within the same modulation family of an equal or lower output power provided the result is less than 50% of the limit.



Testing data

FCC 15.31(m) and RSS-Gen 6.9 Number of frequencies FCC Part 15 Subpart A and RSS-Gen, Issue 5

8.2.4 Test data

### Table 8.2-2: Test channels selection

Start of Frequency range, MHz	End of Frequency range, MHz	Frequency range bandwidth, MHz	Low channel, MHz	Mid channel, MHz	High channel, MHz
2400	2483.5	83.5	2402	2440	2480



Testing data
FCC and RSS-Gen, section 6.8 Antenna requirement
FCC Part 15 Subpart C and RSS-Gen, Issue 5

### 8.3 FCC 15.203 and RSS-Gen, section 6.8 Antenna requirement

8.3.1 Definitions and limits
------------------------------

#### FCC:

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. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with §15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

### ISED:

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report.

8.3.2	rest dat	te				
Start dat	e	October 17, 2019				
8.3.3	Observa	ations, settings and special notes				
None						
8.3.4	Test dat	ta				
Must the I	EUT be profe	essionally installed?	☐ YES	⊠ NO		
Does the E	UT have de	tachable antenna(s)?	☐ YES	$\boxtimes$ NO		
	If detachab	ole, is the antenna connector(s) non-standard?	☐ YES	$\square$ NO	⊠ N/A	



Testing data

FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth for DTS systems

FCC Part 15 Subpart C and RSS-247, Issue 2

#### FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth for DTS systems 8.4

#### Definitions and limits 8.4.1

### FCC:

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.

### ISED:

The minimum 6 dB bandwidth shall be 500 kHz.

#### 8.4.1 Test date

October 19, 2019 Start date

#### 8.4.2 Observations, settings and special notes

The test was performed as per KDB 558074, section 8.2 with reference to ANSI C63.10 subclause 11.8. Spectrum analyser settings:

Resolution bandwidth	100 kHz
Video bandwidth	≥3 × RBW
Frequency span	3 MHz
Detector mode	Peak
Trace mode	Max Hold

#### Test data 8.4.3

### Table 8.4-1: 6 dB bandwidth results

Frequency, MHz	6 dB bandwidth, kHz	Minimum limit, kHz	Margin, MHz
2402	755	500	255
2440	779	500	279
2480	764	500	264

### Table 8.4-2: 99% occupied bandwidth results

Frequency, MHz	99% occupied bandwidth, kHz
2402	1035
2440	1035
2480	1034

Note: there is no 99% occupied bandwidth limit in the standard's requirements, the measurement results provided for information purposes only.

Report reference ID: 38329-2R1TRFWL Applicant: Interaxon Inc.



Section 8 Test name Testing data FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth for DTS systems

FCC Part 15 Subpart C and RSS-247, Issue 2

#### 8.4.1 Test data, continued



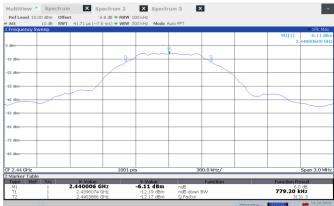


Figure 8.4-1: 6 dB bandwidth on low channel

Figure 8.4-2: 6 dB bandwidth on mid channel

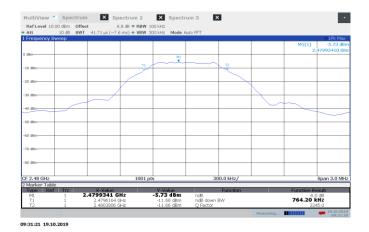


Figure 8.4-3: 6 dB bandwidth on high channel



Testing data

FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth for DTS systems

FCC Part 15 Subpart C and RSS-247, Issue 2

### 8.4.1 Test data, continued



Figure 8.4-4: 99% occupied bandwidth on low channel

Figure 8.4-5: 99% occupied bandwidth on mid channel



Figure 8.4-6: 99% occupied bandwidth on high channel



Section 8
Test name

Testing data

FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements FCC Part 15 Subpart C and RSS-247, Issue 2

### 8.5 FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements for DTS in 2 GHz

### 8.5.1 Definitions and limits

#### FCC:

- (b) The maximum peak conducted output power of the intentional radiator shall not exceed the following:
  - (3) For systems using digital modulation in the 2400–2483.5 MHz band: 1 W (30 dBm). 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.
  - (4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.
- (c) Operation with directional antenna gains greater than 6 dBi.
- (1) Fixed point-to-point operation:
- (i) Systems operating in the 2400–2483.5 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum conducted output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.
- (iii) Fixed, point-to-point operation, as used in paragraphs (c)(1)(i) and (c)(1)(ii) of this section, excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum or digitally modulated intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.
- (2) In addition to the provisions in paragraphs (b)(1), (b)(3), (b)(4) and (c)(1)(i) of this section, transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams, simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers provided the emissions comply with the following:
- (i) Different information must be transmitted to each receiver.
- (ii) If the transmitter employs an antenna system that emits multiple directional beams but does not do emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device, i.e., the sum of the power supplied to all antennas, antenna elements, staves, etc. and summed across all carriers or frequency channels, shall not exceed the limit specified in paragraph (b)(1) or (b)(3) of this section, as applicable. However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as follows:
- (A) The directional gain shall be calculated as the sum of 10 log (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.
- (B) A lower value for the directional gain than that calculated in paragraph (c)(2)(ii)(A) of this section will be accepted if sufficient evidence is presented, e.g., due to shading of the array or coherence loss in the beamforming.
- (iii) If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the power limit specified in paragraph (c)(2)(ii) of this section. If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the limit specified in paragraph (c)(2)(ii) of this section. In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the limit specified in paragraph (c)(2)(ii) of this section by more than 8 dB. (iv) Transmitters that emit a single directional beam shall operate under the provisions of paragraph (c)(1) of this section.

Report reference ID: 38329-2R1TRFWL Applicant: Interaxon Inc. Model: MS-01



Testina data

FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements

FCC Part 15 Subpart C and RSS-247, Issue 2

#### ISFD:

d. For DTSs employing digital modulation techniques operating in the 2400–2483.5 MHz band, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in 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.

e. Fixed point-to-point systems in the 2400–2483.5 MHz band are permitted to have an e.i.r.p. higher than 4 W provided that the higher e.i.r.p. is achieved by employing higher gain directional antennas and not higher transmitter output powers. Point-to-multipoint systems, omnidirectional applications and multiple co-located transmitters transmitting the same information are prohibited from exceeding an e.i.r.p. of 4 W.

f. Transmitters operating in the band 2400–2483.5 MHz, may employ antenna systems that emit multiple directional beams simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers, provided that the emissions comply with the following:

i Different information must be transmitted to each receiver.

ii If the transmitter employs an antenna system that emits multiple directional beams, but does not emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device (i.e. the sum of the power supplied to all antennas, antenna elements, staves, etc., and summed across all carriers or frequency channels) shall not exceed the applicable output power limit specified in sections 5.4(b) and 5.4(d). However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as the sum of 10 log (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.

iii If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the applicable power limit specified in sections 5.4(b) and 5.4(d). If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the applicable limit specified in sections 5.4(b) and 5.4(d). In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the applicable limit specified in sections 5.4(b) and 5.4(d) by more than 8 dB. iv Transmitters that transmit a single directional beam shall operate under the provisions of sections 5.4(b), 5.4(d) and 5.4(e).

_	
8.5.1	Test date
0.5.1	i est uate

Start date

October 19, 2019



Testing data

FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements

FCC Part 15 Subpart C and RSS-247, Issue 2

### 8.5.2 Observations, settings and special notes

The test was performed as per KDB 558074, section 8.3 with reference to ANSI C63.10 subclause 11.9.1 (peak power) The test was performed using method RBW≥DTS bandwidth (Maximum peak conducted output power) Spectrum analyser settings:

Resolution bandwidth	1 MHz
Video bandwidth	≥3 × RBW
Frequency span	3 MHz
Detector mode	Peak
Trace mode	Max Hold

### 8.5.3 Test data

**Table 8.5-1:** Output power measurements results

Frequency,	Conducted out	put power, dBm	Maurin dB	Antenna gain,	EIRP,	EIRP limit,	FIDD meaning dD
MHz	Measured	Limit	Margin, dB	dBi	dBm	dBm	EIRP margin, dB
2402	-3.3	30.0	33.3	0.5	-2.8	36.0	38.8
2440	-3.3	30.0	33.3	0.5	-2.8	36.0	38.8
2480	-3.3	30.0	33.3	0.5	-2.8	36.0	38.8

Note: WFL connector offset (0.6 dB) added to conducted output power measured values

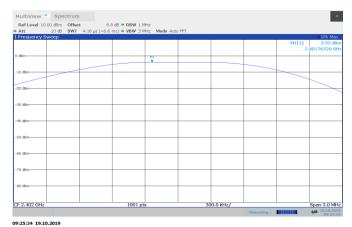


Testing data

FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements

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FCC Part 15 Subpart C and RSS-247, Issue 2



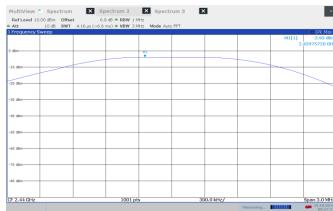


Figure 8.5-1: Output power on low channel

Figure 8.5-2: Output power on mid channel

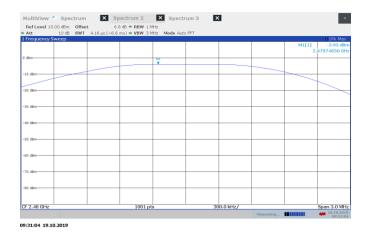


Figure 8.5-3: Output power on high channel

Section 8
Test name

Testing data

FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

FCC Part 15 Subpart C and RSS-247, Issue 2

### 8.6 FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

### 8.6.1 Definitions and limits

#### FCC:

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)).

#### ISED

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 8.6-1: FCC §15.209 and RSS-Gen – Radiated emission limits

Frequency,	Field stren	gth of emissions	Measurement distance, m
MHz	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 8.6-2: ISED restricted frequency bands

MHz	MHz	MHz	GHz
0.090-0.110	12.57675–12.57725	399.9–410	7.25–7.75
0.495-0.505	13.36-13.41	608-614	8.025-8.5
2.1735-2.1905	16.42-16.423	960–1427	9.0–9.2
3.020-3.026	16.69475-16.69525	1435-1626.5	9.3–9.5
4.125-4.128	16.80425-16.80475	1645.5-1646.5	10.6–12.7
4.17725-4.17775	25.5-25.67	1660-1710	13.25-13.4
4.20725-4.20775	37.5–38.25	1718.8-1722.2	14.47–14.5
5.677-5.683	73–74.6	2200–2300	15.35-16.2
6.215-6.218	74.8–75.2	2310–2390	17.7–21.4
6.26775-6.26825	108–138	2483.5-2500	22.01-23.12
6.31175-6.31225	149.9–150.05	2655–2900	23.6-24.0
8.291-8.294	156.52475-156.52525	3260–3267	31.2-31.8
8.362-8.366	156.7–156.9	3332–3339	36.43-36.5
8.37625-8.38675	162.0125-167.17	3345.8-3358	
8.41425-8.41475	167.72–173.2	3500–4400	Aha 20 C
12.29-12.293	240–285	4500-5150	Above 38.6
12.51975-12.52025	322–335.4	5350-5460	

Note: Certain frequency bands listed in Table 8.6-2 and above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

Report reference ID: 38329-2R1TRFWL Applicant: Interaxon Inc.



Testing data

FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

FCC Part 15 Subpart C and RSS-247, Issue 2

Table 8.6-3: 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			

### 8.6.1 Test date

Start date October 17, 2019

### 8.6.2 Observations, settings and special notes

The spectrum was searched from 30 MHz to the 10<sup>th</sup> harmonic.

Radiated measurements were performed at a distance of 3 m from 30 MHz - 18 GHz.

Radiated measurements were performed at a distance of 1 m from 18 - 25 GHz.

DTS emissions in non-restricted frequency bands test was performed as per KDB 558074, section 8.5 with reference to ANSI C63.10 subclause 11.11.

Since fundamental power was tested using the maximum peak conducted output power procedure to demonstrate compliance, the spurious emissions limit is –20 dBc/100 kHz.

DTS emissions in restricted frequency bands test was performed as per KDB 558074, section 8.6 with reference to ANSI C63.10 subclause 11.12.

DTS band-edge emission measurements test was performed as per KDB 558074, section 8.7 with reference to ANSI C63.10 subclause 11.13.

Spectrum analyser settings for radiated measurements within restricted bands below 1 GHz:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for peak radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	3 MHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for average radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	10 Hz
Detector mode:	Peak
Trace mode:	Max Hold



Testing data

FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

FCC Part 15 Subpart C and RSS-247, Issue 2

Spectrum analyser settings for conducted spurious emissions measurements:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

#### Test data 8.6.4

**Table 8.6-4:** Radiated field strength measurement results – Restricted Bands

Channel	Frequency, MHz	Peak Field strength, dBμV/m		Margin,	Average Field strength, dBμV/m		Margin,
		Measured	Limit	dB	Measured	Limit	dB
Low	2390.0	53.58	74.00	20.42	40.79	54.00	13.21
High	2483.5	66.63	74.00	7.37	41.09	54.00	12.91

Field strength includes correction factor of antenna, cable loss, amplifier, and attenuators where applicable. Notes:

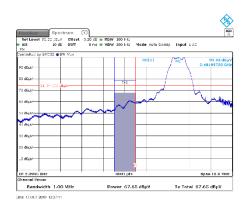


Figure 8.6-1: Radiated emissions in restricted Band 2390 MHz, Peak

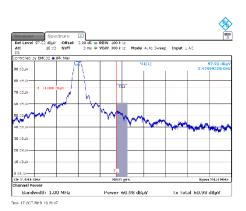


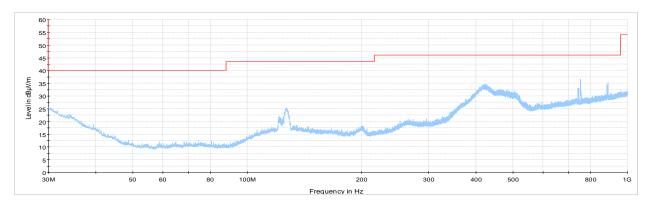
Figure 8.6-3: Radiated emissions in restricted Band 2483.5 MHz, Peak



Figure 8.6-2: Radiated emissions in restricted Band 2390 MHz, Average

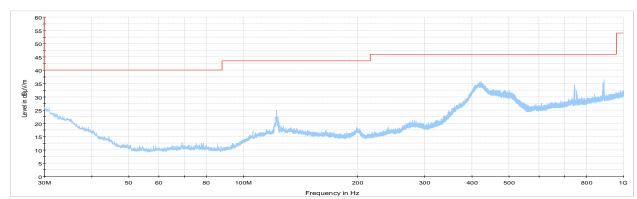


Figure 8.6-4: Radiated emissions in restricted Band 2483.5 MHz, Average



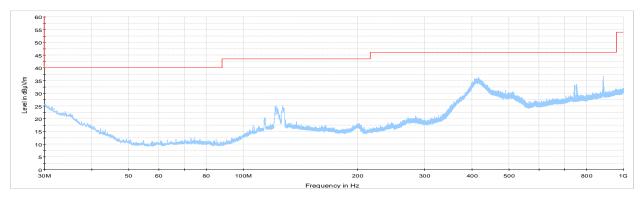
NEX-383829 Spurious emissions FCC 15.209 30 - 1000 MHz low channel Preview Result 1-PK+ FCC 15.209 and RSS-210 limit line RB

Figure 8.6-5: Radiated Spurious emissions 30 MHz – 1 GHz, low channel



NEX-383829 Radiated spurious FCC 15.209 30 - 1000 MHz mid channel Preview Result 1-PK+ FCC 15.209 and RSS-210 limit line RB

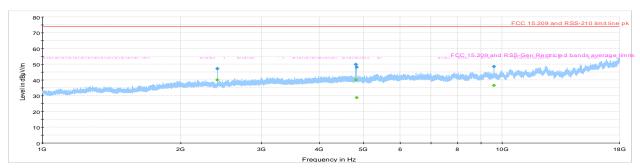
Figure 8.6-6: Radiated Spurious emissions 30 MHz – 1 GHz, mid channel



NEX-383829 Radiated spurious FCC 15.209 30 - 1000 MHz high channel Preview Result 1-PK+ FCC 15.209 and RSS-210 limit line RB

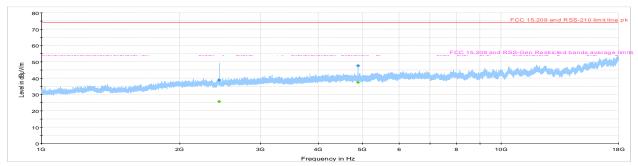
Figure 8.6-7: Radiated Spurious emissions 30 MHz – 1 GHz, high channel





NEX-383829 Radiated spurious FCC 15.209 1 - 18 GHz low channel
Preview Result1-PK+
FCC 15.209 and RSS-210 limit line pk
FCC 15.209 and RSS-Gen Restricted bands average limits

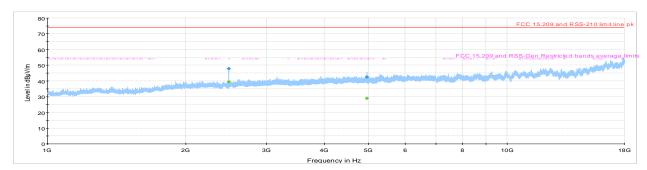
Figure 8.6-8: Radiated Spurious emissions 1-18 GHz, low channel



NEX-383829 Radiated spurious FCC 15.209 1 - 18 GHz mid channel

- Preview Result 1-PK+ FCC 15.209 and RSS-210 limit line pk FCC 15.209 and RSS-Gen Restricted bands average limits Final, Result PK+ Final, Result CAV

Figure 8.6-9: Radiated Spurious emissions 1 - 18GHz, mid channel

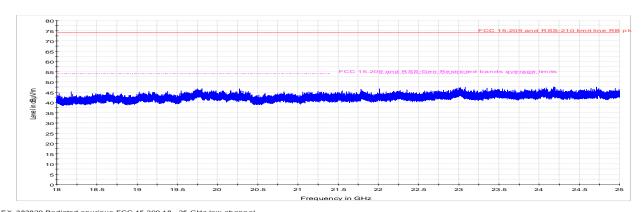


NEX-383829 Radiated spurious FCC 15.209 1 - 18 GHz high channel

- 929 Radiated spurious FCC 15.209 1 16 GH2 high channel Preview Result 1-PK+ FCC 15.209 and RSS-210 limit line pk FCC 15.209 and RSS-Gen Restricted bands average limits Final, Result PK+ Final\_Result CAV

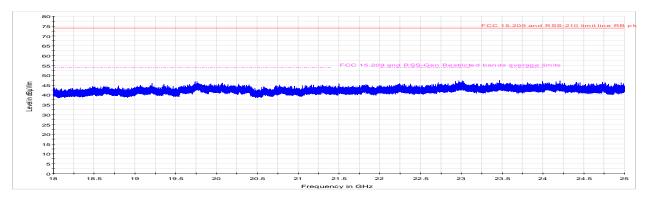
Figure 8.6-10: Radiated Spurious emissions 1 - 18 GHz, high channel

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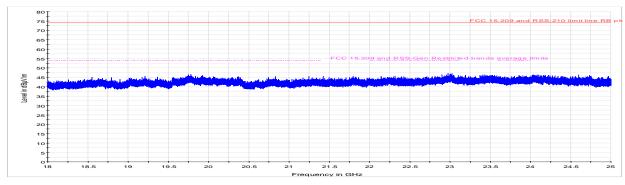
NEX-383829 Radiated spurious FCC 15.209 18 - 25 GHz low channel
PK+\_MAX H@EMI Sweep (1)
FCC 15.209 and RSS-210 limit line RB pk
FCC 15.209 and RSS-Gen Restricted bands average limits

Figure 8.6-11: Radiated Spurious emissions 18 – 25 GHz low channel



NEX-383829 Radiated spurious FCC 15.209 18 - 25 GHz mid channel
PK+\_MAXH@EMI Sweep(1)
FCC 15.209 and RSS-210 limit line RB pk
FCC 15.209 and RSS-Gen Restricted bands average limits

Figure 8.6-12: Radiated Spurious emissions 18 – 25 GHz mid channel



329 Radiated spurious FCC 15.209 18 - 25 GHz high channel FK+\_MAXH⊛EMI Sweep(1) FCC 15.209 and RSS-210 limit line RB pk FCC 15.209 and RSS-Gen Restricted bands average limits

Figure 8.6-13: Radiated Spurious emissions 18 – 25 GHz high channel

FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions FCC Part 15 Subpart C and RSS-247, Issue 2

#### 8.6.4 Test data, continued



Figure 8.6-14: Conducted band edge emissions, low channel



Figure 8.6-15: Conducted band edge emissions, high channel



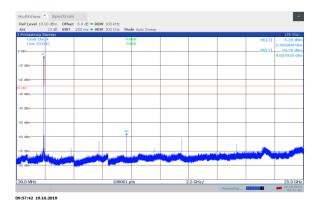


Figure 8.6-16: Conducted spurious emissions low channel

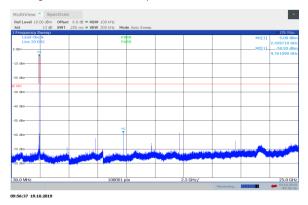


Figure 8.6-17: Conducted spurious emissions for mid channel

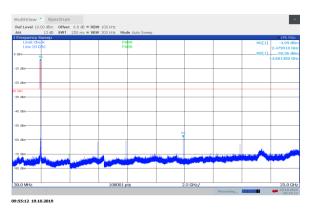


Figure 8.6-18: Conducted spurious emissions for high channel



Testina data

FCC Clause 15.247(e) and RSS-247 5.2(b) Power spectral density for digitally modulated devices FCC Part 15 Subpart C and RSS-247, Issue 2

### 8.7 FCC 15.247(e) and RSS-247 5.2(b) Power spectral density for digitally modulated devices

### 8.7.1 Definitions and limits

#### FCC:

For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

(f) For the purposes of this section, hybrid systems are those that employ a combination of both frequency hopping and digital modulation techniques. The frequency hopping operation of the hybrid system, with the direct sequence or digital modulation operation turned-off, shall have an average time of occupancy on any frequency not to exceed 0.4 seconds within a time period in seconds equal to the number of hopping frequencies employed multiplied by 0.4. The power spectral density conducted from the intentional radiator to the antenna due to the digital modulation operation of the hybrid system, with the frequency hopping operation turned off, shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

#### ISED

The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

### 5.3 Hybrid systems

Hybrid systems employ a combination of both frequency hopping and digital transmission techniques and shall comply with the following:

a. With the frequency hopping turned off, the digital transmission operation shall comply with the power spectral density requirements for digital modulation systems set out in of section 5.2(b) or section 6.2.4 for hybrid devices operating in the band 5725–5850 MHz.

### 8.7.1 Test date

Start date October 19, 2019

### 8.7.2 Observations, settings and special notes

Power spectral density test was performed as per KDB 558074, section 8.4 with reference to ANSI C63.10 subclause 11.10. The test was performed using method PKPSD (peak PSD). Spectrum analyser settings:

Resolution bandwidth:	3 kHz
Video bandwidth:	≥3 × RBW
Frequency span:	1.5 times the DTS BW (Peak)
Detector mode:	Peak
Trace mode:	Max hold

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8.7.3 Test data

Table 8.7-1: PSD measurements results

Frequency, MHz	PSD, dBm/3 kHz	PSD limit, dBm/3 kHz	Margin, dB
2402	-19.5	8.00	27.5
2440	-19.5	8.00	27.5
2480	-19.5	8.00	27.5

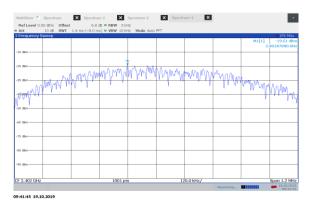


Figure 8.7-1: PSD low channel

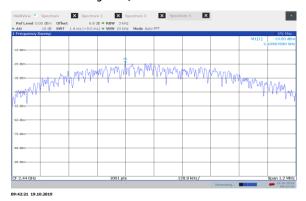


Figure 8.7-2: PSD mid channel

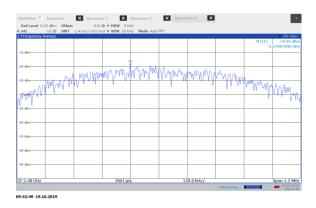
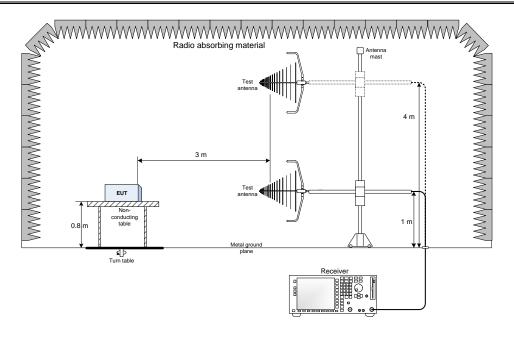


Figure 8.7-3: PSD high channel

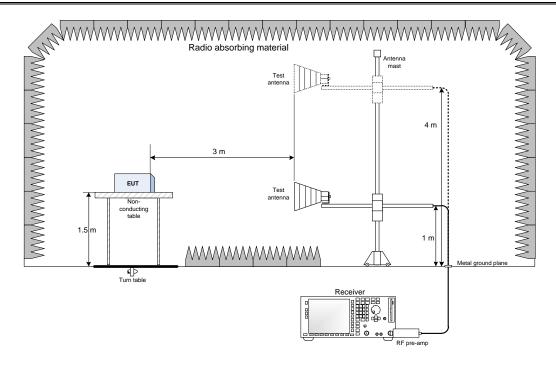


# Section 9. Block diagrams of test set-ups

# 9.1 Radiated emissions set-up for frequencies below 1 GHz



### 9.2 Radiated emissions set-up for frequencies above 1 GHz





# 9.3 Antenna port set-up

