

December 23, 2020

Bluecats US LLC  
6767 Old Madison Pike Suite 300  
Huntsville, Alabama 35806  
USA

Dear Kurt Nehrenz,

Enclosed is the EMC Wireless test report for compliance testing of the Bluecats US LLC, BC4520 ProxPoint as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15 Subpart C for Intentional Radiators.

Thank you for using the services of Eurofins E&E North America. If you have any questions regarding these results or if we can be of further service to you, please feel free to contact me.

Sincerely yours,  
EUROFINS E&E NORTH AMERICA



Arsalan Hasan  
Wireless Laboratory

Reference: (Bluecats US LLC\WIRS109093-FCC247 BLE Rev 0)



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Eurofins MET Laboratories Inc. (Eurofins E&E North America) is part of the Eurofins Electrical & Electronics (E&E) global compliance network.

## **Electromagnetic Compatibility Criteria Test Report**

for the

**Bluecats US LLC  
BC4520 ProxPoint**

**Tested under**  
the FCC Certification Rules  
contained in  
15.247 Subpart C for Intentional Radiators

**Report: WIRS109093-FCC247 BLE Rev 0**

December 23, 2020

**Prepared For:**

**Bluecats US LLC  
6767 Old Madison Pike Suite 300  
Huntsville, Alabama 35806  
USA**

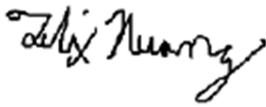
**Prepared By:**  
**Eurofins E&E North America**  
3162 Belick Street  
Santa Clara, CA 95054

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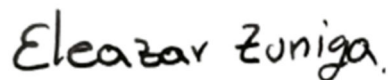


Felix Huang  
Engineer, Wireless Laboratory



Arsalan Hasan  
Manager, Wireless Laboratory

**Engineering Statement:** The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Part 15.247 under normal use and maintenance.



Eleazar Zuniga, PhD.  
Director, Wireless Technologies

## Report Status Sheet

| Revision | Report Date       | Reason for Revision |
|----------|-------------------|---------------------|
| ∅        | December 23, 2020 | Initial Issue.      |

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## List of Terms and Abbreviations

|                     |   |
|---------------------|---|
| AC                  | Alternating Current                           |
| ACF                 | Antenna Correction Factor                     |
| Cal                 | Calibration                                   |
| <i>d</i>            | Measurement Distance                          |
| dB                  | Decibels                                      |
| dB <sub>μ</sub> A   | Decibels above one <b>microamp</b>            |
| dB <sub>μ</sub> V   | Decibels above one <b>microvolt</b>           |
| dB <sub>μ</sub> A/m | Decibels above one <b>microamp per meter</b>  |
| dB <sub>μ</sub> V/m | Decibels above one <b>microvolt per meter</b> |
| DC                  | Direct Current                                |
| E                   | Electric Field                                |
| DSL                 | Digital Subscriber Line                       |
| ESD                 | Electrostatic Discharge                       |
| EUT                 | Equipment Under Test                          |
| <i>f</i>            | Frequency                                     |
| FCC                 | Federal Communications Commission             |
| GRP                 | Ground Reference Plane                        |
| H                   | Magnetic Field                                |
| HCP                 | Horizontal Coupling Plane                     |
| Hz                  | Hertz   |
| IEC                 | International Electrotechnical Commission     |
| kHz                 | kilohertz                                     |
| kPa                 | kilopascal                                    |
| kV                  | kilovolt                                      |
| LISN                | Line Impedance Stabilization Network          |
| MHz                 | Megahertz                                     |
| μH                  | microhenry                                    |
| μ                   | microfarad                                    |
| μs                  | microseconds                                  |
| NEBS                | Network Equipment-Building System             |
| PRF                 | Pulse Repetition Frequency                    |
| RF                  | Radio Frequency                               |
| RMS                 | Root-Mean-Square                              |
| TWT                 | Traveling Wave Tube                           |
| V/m                 | Volts <b>per meter</b>                        |
| VCP                 | Vertical Coupling Plane                       |

# I. Executive Summary

## 1.1 Purpose of Test

An EMC Wireless evaluation was performed to determine compliance of the Bluecats US LLC BC4520 ProxPoint, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the BC4520 ProxPoint. Bluecats US LLC should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the BC4520 ProxPoint, has been **permanently** discontinued.

## 1.2 Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with Bluecats US LLC, purchase order number PO-BCUS-00608. All tests were conducted using measurement procedure ANSI C63.4-2014.

| FCC Reference<br>47 CFR Part 15.247:2005                     | Description                                     | Compliance |
|--|---|------------|
| Title 47 of the CFR, Part 15 §15.203                         | Antenna Requirement                             | Compliant  |
| Title 47 of the CFR, Part 15 §15.207(a)                      | Conducted Emission Limits                       | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(a)(2)                   | 6dB Occupied Bandwidth                          | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(b)                      | Peak Power Output                               | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(d);<br>§15.209; §15.205 | Radiated Spurious Emissions<br>Requirements     | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(d)                      | RF Conducted Spurious Emissions<br>Requirements | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(d)                      | RF Conducted Band Edge                          | Compliant  |
| Title 47 of the CFR, Part 15; §15.247(e)                     | Peak Power Spectral Density                     | Compliant  |
| Title 47 of the CFR, Part 15 §15.247(i)                      | Maximum Permissible Exposure (MPE)              | Compliant  |

**Table 1: Executive Summary of EMC Part 15.247 Compliance Testing**



## II. Equipment Configuration

## 2.1 Overview

Eurofins MET Laboratories, Inc. was contracted by Bluecats US LLC to perform testing on the BC4520 ProxPoint, under Bluecats US LLC’s purchase order number PO-BCUS-00608.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Bluecats US LLC, BC4520 ProxPoint.

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

|                                       |   |                 |
|---------------------------------------|---|-----------------|
| <b>Model(s) Tested:</b>               | BC4520 ProxPoint  |                 |
| <b>Model(s) Covered:</b>              | BC4520 ProxPoint  |                 |
| <b>Filing Status:</b>                 | Original  |                 |
| <b>EUT Specifications:</b>            | Primary Power: 120V (AC/DC Adaptor)                     |                 |
|                                       | FCC ID: 2AHXCBC4520                                     |                 |
|                                       | Type of Modulations:                                    | GFSK            |
|                                       | Equipment Code:   | DTS             |
|                                       | Peak RF Output Power:                                   | 4.038 dBm       |
|                                       | EUT Frequency Ranges:                                   | 2402 – 2480 MHz |
| <b>Analysis:</b>                      | The results obtained relate only to the item(s) tested. |                 |
| <b>Environmental Test Conditions:</b> | Temperature: 15-35° C                                   |                 |
|                                       | Relative Humidity: 30-60%                               |                 |
|                                       | Barometric Pressure: 860-1060 mbar                      |                 |
| <b>Evaluated by:</b>                  | Arsalan Hasan   |                 |
| <b>Report Date(s):</b>                | December 23, 2020                                       |                 |

Table 2: EUT Summary Table

## 2.2 References

|                                   |   |
|-----------------------------------|---|
| <b>CFR 47, Part 15, Subpart C</b> | Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies |
| <b>ANSI C63.4:2014</b>            | Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz                                |
| <b>ISO/IEC 17025:2005</b>         | General Requirements for the Competence of Testing and Calibration Laboratories   |
| <b>ANSI C63.10-2013</b>           | American National Standard for Testing Unlicensed Wireless Devices  |

Table 3: References

## 2.3 Test Site

All testing was performed at Eurofins MET Labs, 3162 Belick St., Santa Clara, CA 95054. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Eurofins MET Labs is a ISO/IEC 17025 accredited site by A2LA, California #0591.02.

## 2.4 Measurement Uncertainty

| Test Method                           | Typical Expanded Uncertainty | K | Confidence Level |
|---------------------------------------|------------------------------|---|------------------|
| RF Frequencies                        | ±4.52 Hz                     | 2 | 95%              |
| RF Power Conducted Emissions          | ±2.32 dB                     | 2 | 95%              |
| RF Power Conducted Spurious Emissions | ±2.25 dB                     | 2 | 95%              |
| RF Power Radiated Emissions           | ±3.01 dB                     | 2 | 95%              |

Table 4. Measurement Uncertainty

## 2.5 Description of Test Sample

The Bluecats US LLC BC4520 ProxPoint is an RTLS gateway that receives Bluetooth transmissions from beacons and tags, filters and processes location and sensor information, and forwards to a server via Ethernet, Wi-Fi, or LTE.

## 2.6 Equipment Configuration

The EUT was set up as outlined in **Error! Reference source not found.**, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

| Ref. ID | Slot #      | Name / Description                      | Model Number             | Part Number | Serial Number | Revision |
|---------|-------------|---|--------------------------|-------------|---------------|----------|
|         | NA          | BC4520 ProxPoint                        | BC4520                   | NA          | NA            | NA       |
|         | BT1,<br>BT4 | Bluetooth Stick Antenna,<br>Right Angle | W5029                    | NA          | NA            | NA       |
|         | BT2,<br>BT3 | Bluetooth Stick Antenna,<br>Straight    | W5029RPGT                | NA          | NA            | NA       |
|         | LTE         | LTE Flat Bar Antenna,<br>2m cable       | ANT-LTE-VDP-<br>2000-SMA | NA          | NA            | NA       |
|         | GNSS        | GPS GLONASS SMA,<br>3m cable            | ANT-GPS-SH2-<br>SMA      | NA          | NA            | NA       |
|         | PWR         | Power Adapter                           | GST25A12-P1J             | NA          | NA            | NA       |
|         | ETH         | M12 X-Coded to RJ45<br>10m cable        | ETH                      | NA          | NA            | NA       |

Table 5: Equipment Configuration

## 2.7 Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

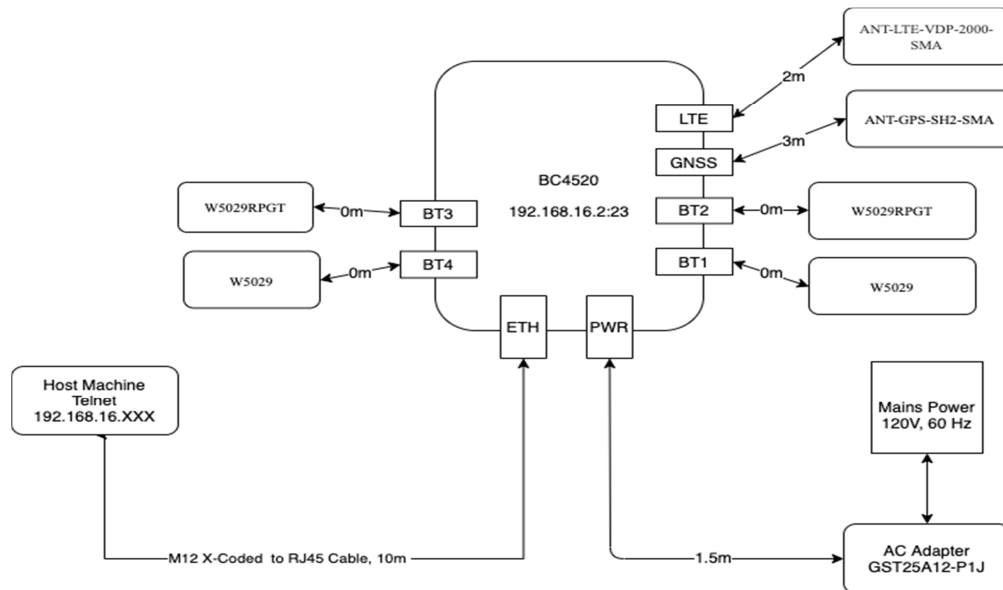
| Ref. ID | Name / Description     | Manufacturer | Model Number | *Customer Supplied Calibration Data |
|---------|------------------------|--------------|--------------|-------------------------------------|
|         | Laptop with Windows 10 | HP           | NA           | N/A                                 |

**Table 6: Support Equipment**

## 2.8 Ports and Cabling Information

| Ref. ID | Port name on EUT | Cable Description or reason for no cable          | Qty | Length as tested (m) | Max Length (m) | Shielded? (Y/N) | Termination Box ID & Port Name |
|---------|------------------|---|-----|----------------------|----------------|-----------------|--------------------------------|
|         | BT1              | W5029 Antenna                                     | 1   | NA                   | NA             | NA              | NA                             |
|         | BT2              | W5029RPGT Antenna                                 | 1   | NA                   | NA             | NA              | NA                             |
|         | BT3              | W5029RPGT Antenna                                 | 1   | NA                   | NA             | NA              | NA                             |
|         | BT4              | W5029 Antenna                                     | 1   | NA                   | NA             | NA              | NA                             |
|         | LTE              | ANT-LTE-VDP-2000-SMA Antenna                      | 1   | 2m                   | NA             | Yes             | NA                             |
|         | GNSS             | ANT-GPS-SH2-SMA Antenna                           | 1   | 3m                   | NA             | Yes             | NA                             |
|         | ETH              | M12 X-Coded connector to RJ45                     | 1   | 10m                  | NA             | Yes             | NA                             |
|         | PWR              | M12 A-Coded terminated GST25A12-PIJ Power Adapter | 1   | NA                   | NA             | NA              | (120v/60hz)                    |

**Table 7: Ports and Cabling Information**



**Figure 1: EUT configuration**

## **2.9 Mode of Operation During Testing**

Standard test mode was used. Allows independent activation of all radios in their various test modes, as well as methods to generate traffic similar to normal operation on all digital busses.

## **2.10 Method of Monitoring EUT Operation**

The signal will be displayed on a spectrum analyzer.

## **2.11 Modifications**

### **2.11.1 Modifications to EUT**

No modifications were made to the EUT.

### **2.11.2 Modifications to Test Standard**

No modifications were made to the test standard.

## **2.12 Disposition of EUT**

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Bluecats US LLC upon completion of testing.

### **III. Electromagnetic Compatibility Criteria for Intentional Radiators**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.203 Antenna Requirement

**Test Requirement:** § 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. 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

**Results:** The EUT **completed testing** to the criteria of §15.203.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020

| EUT Model/Mode | Gain    | Type                   | Manufacturer |
|----------------|---------|------------------------|--------------|
| W5029X         | 2.3 dBi | External Stick Antenna | Pulse Larsen |

**Table 8: Antenna Requirement, Antenna List**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.207(a) Conducted Emissions Limits

**Test Requirement(s):** § 15.207 (a): 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 150 kHz to 30MHz, shall not exceed the limits in the following table, as measured using a 50  $\mu$ H/50  $\Sigma$  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 range<br>(MHz) | § 15.207(a), Conducted Limit (dB $\mu$ V) |         |
|--------------------------|---|---------|
|                          | Quasi-Peak                                | Average |
| * 0.15- 0.45             | 66 - 56                                   | 56 - 46 |
| 0.45 - 0.5               | 56  | 46      |
| 0.5 - 30                 | 60  | 50      |

**Table 9: Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)**

**Test Procedure:** The EUT was placed on a 0.8 m-high wooden table inside a screen room. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50  $\Omega$ /50  $\mu$ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with *ANSI C63.4-2014 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz"*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50  $\Omega$ /50  $\mu$ H LISN as the input transducer to an EMC/field intensity meter. For the purpose of this testing, the transmitter was turned on. Scans were performed with the transmitter on.

**Test Results:** The EUT **completed testing** to this requirement. Measured emissions were below applicable limits.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020



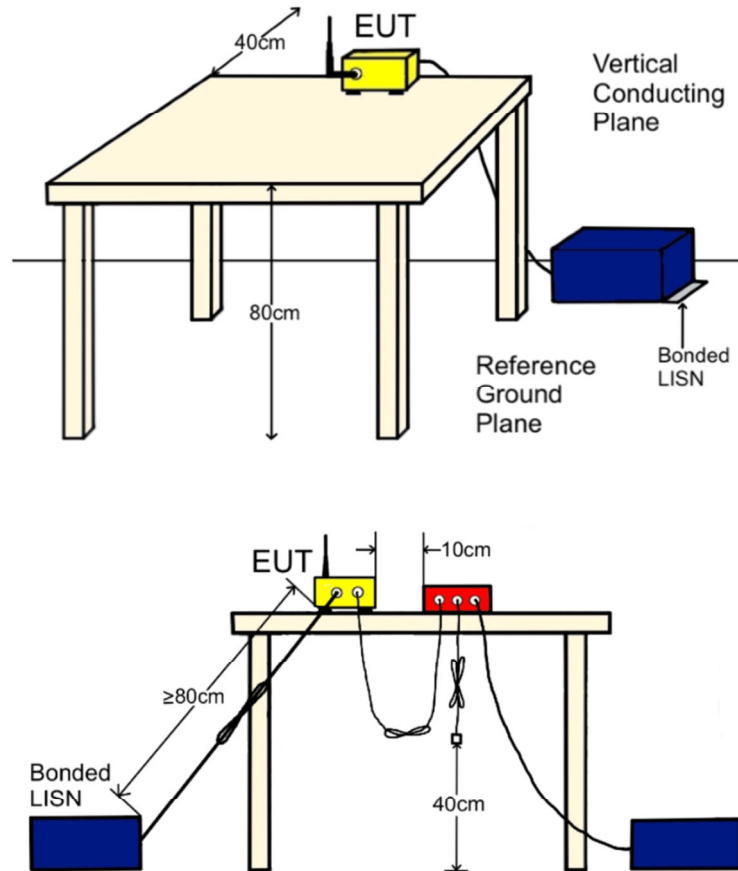
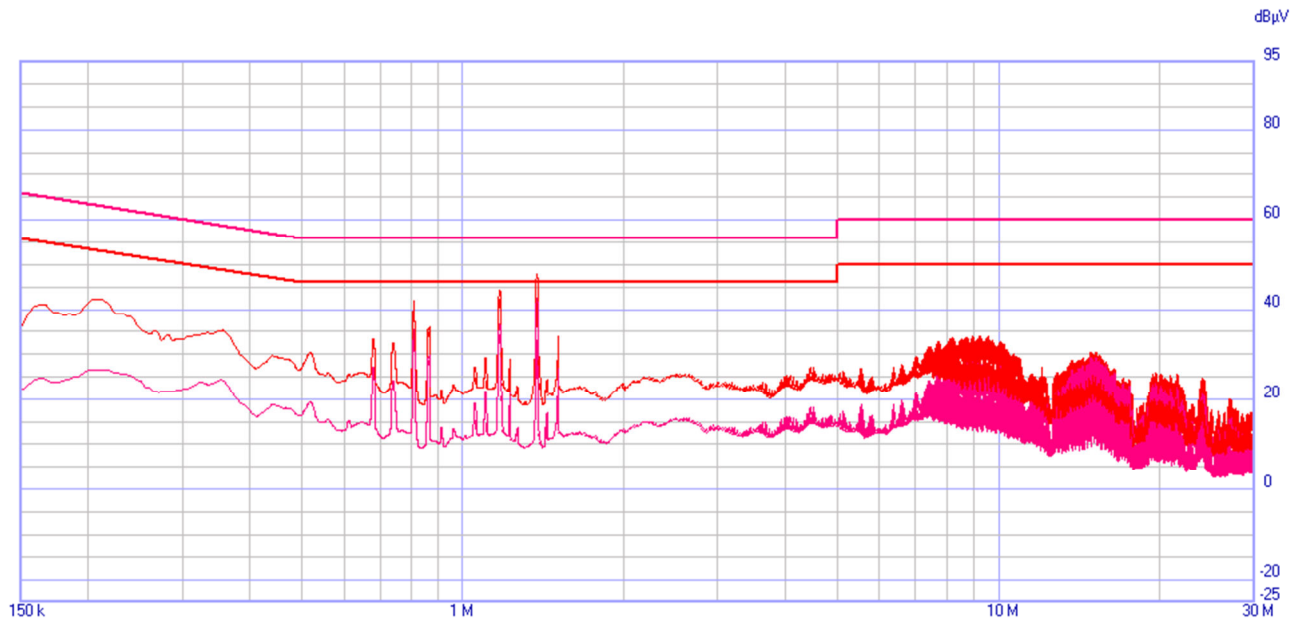


Figure 2: Conducted Emissions Voltage, Test Setup

|                               |  |
|-------------------------------|--|
| <b>LISN Ground Connection</b> | <b>VCP Ground Connection (&lt;2.5mΩ)</b> |
| 1.4mΩ                         | 1.4mΩ                                    |

|      | Freq (MHz) | QP Amplitude | QP Limit | Delta   | Pass | Average Amplitude | Average Limit | Delta   | Pass |
|------|------------|--------------|----------|---------|------|-------------------|---------------|---------|------|
| Line | 0.152045   | 39.33        | 65.888   | -26.558 | Pass | 23.4              | 55.888        | -32.488 | Pass |
| Line | 0.205215   | 50.51        | 63.404   | -12.894 | Pass | 25.84             | 53.404        | -27.564 | Pass |
| Line | 0.810535   | 43.25        | 56       | -12.75  | Pass | 35.76             | 46            | -10.24  | Pass |
| Line | 0.859615   | 37.86        | 56       | -18.14  | Pass | 29.97             | 46            | -16.03  | Pass |
| Line | 1.170455   | 45.5         | 56       | -10.5   | Pass | 37.05             | 46            | -8.95   | Pass |
| Line | 1.370865   | 46.85        | 56       | -9.15   | Pass | 40.87             | 46            | -5.13   | Pass |

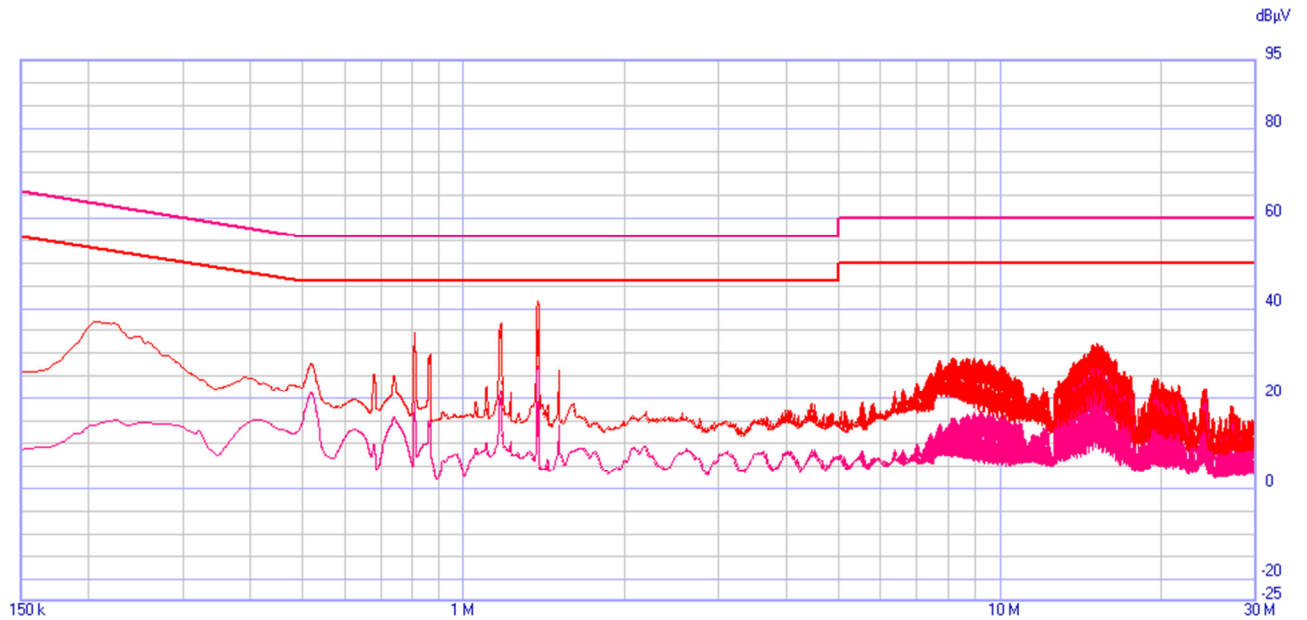
Table 10: Conducted Emissions Limits, Line, Test Data



Plot 1: Conducted Emissions Limits, Line

|         | Freq (MHz) | QP Amplitude | QP Limit | Delta   | Pass | Average Amplitude | Average Limit | Delta   | Pass |
|---------|------------|--------------|----------|---------|------|-------------------|---------------|---------|------|
| Neutral | 0.20726    | 37.7         | 63.322   | -25.622 | Pass | 16.19             | 53.322        | -37.132 | Pass |
| Neutral | 0.810535   | 36.09        | 56       | -19.91  | Pass | 20.06             | 46            | -25.94  | Pass |
| Neutral | 0.86166    | 30.74        | 56       | -25.26  | Pass | 16.73             | 46            | -29.27  | Pass |
| Neutral | 1.170455   | 38.77        | 56       | -17.23  | Pass | 22.41             | 46            | -23.59  | Pass |
| Neutral | 1.370865   | 42.56        | 56       | -13.44  | Pass | 27.13             | 46            | -18.87  | Pass |
| Neutral | 15.04373   | 30.63        | 60       | -29.37  | Pass | 24.3              | 50            | -25.7   | Pass |

Table 11: Conducted Emissions Limits, Neutral, Test Data



Plot 2: Conducted Emissions Limits, Neutral

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(a)(2) 6 dB Bandwidth

**Test Requirements:** § 15.247(a)(2): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

**Test Procedure:** The transmitter was on and transmitting at the highest output power. The bandwidth of the fundamental frequency was measured with the spectrum analyzer using an RBW approximately 1% of the total emission bandwidth, VBW > RBW. The 6 dB Bandwidth was measured and recorded. The measurements were performed on the low, mid and high channels.

**Test Results** The EUT **completed testing** to the requirements of § 15.247 (a)(2). No anomalies noted.

The 6 dB Bandwidth was determined from the plots on the following pages.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020

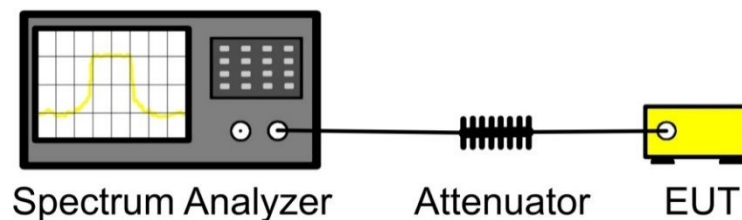
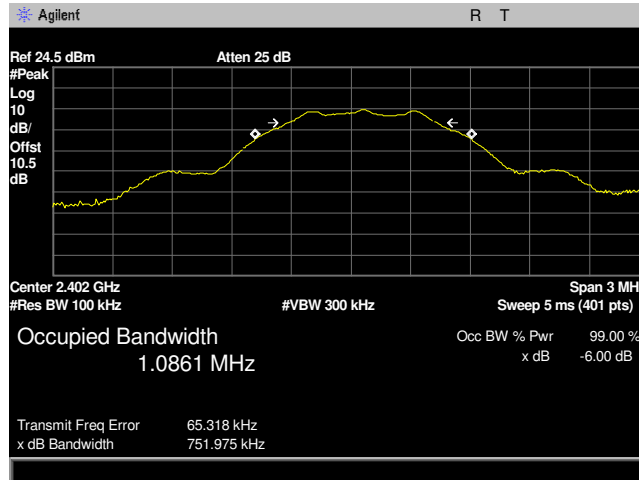


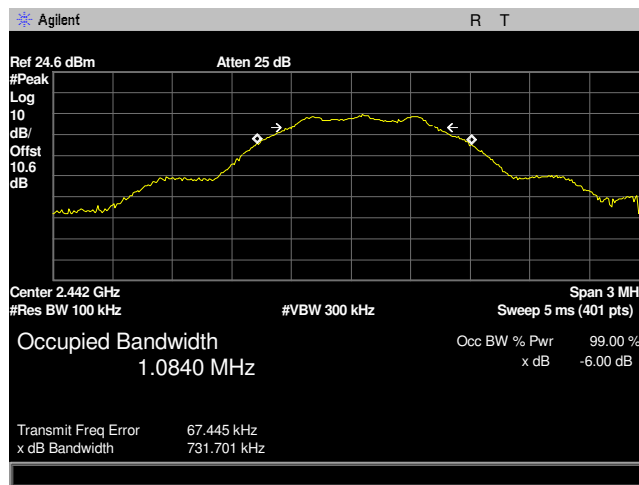
Figure 3: Block Diagram, Occupied Bandwidth Test Setup

| Occupied Bandwidth |                 |                               |             |
|--------------------|-----------------|-------------------------------|-------------|
| Carrier Channel    | Frequency (MHz) | Measured 6 dB Bandwidth (KHz) | Limit (KHz) |
| Low                | 2402            | 751.975                       | ≥500        |
| Mid                | 2442            | 731.701                       | ≥500        |
| High               | 2480            | 745.629                       | ≥500        |

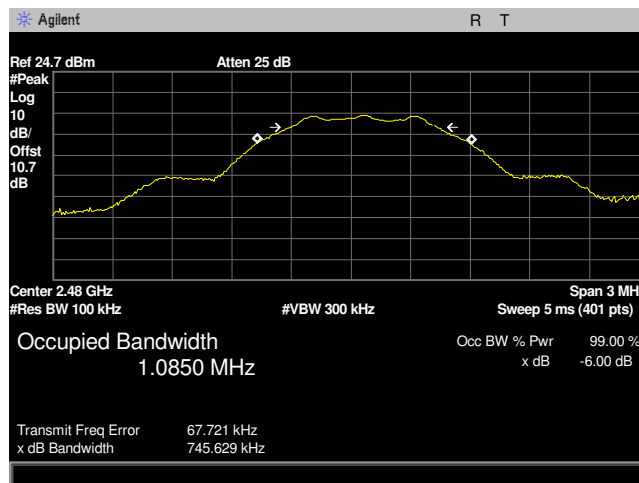
Table 12: 6 dB Bandwidth, Test Data



Plot 3: 6 dB Bandwidth, 2402MHz Low Channel



Plot 4: 6 dB Bandwidth, 2442MHz Mid Channel



Plot 5: 6 dB Bandwidth, 2480MHz High Channel

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(b) Peak Power Output

**Test Requirements:** §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

| Digital Transmission Systems<br>(MHz) | Output Limit<br>(Watts) |
|---------------------------------------|-------------------------|
| 902-928                               | 1.000                   |
| 2400-2483.5                           | 1.000                   |
| 5725- 5850                            | 1.000                   |

**Table 13: Output Power Requirements from §15.247(b)**

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values in the Figure 21, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak 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.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

Fixed, point-to-point operation excludes the use of point-to-multipoint systems, Omni-directional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum 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.

**Test Procedure:** The transmitter was connected to a calibrated spectrum analyzer. The EUT was measured at the low, mid and high channels of each band at the maximum power level.

**Test Results:** The EUT **completed testing** to the requirements of §15.247(b). No anomalies noted.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020

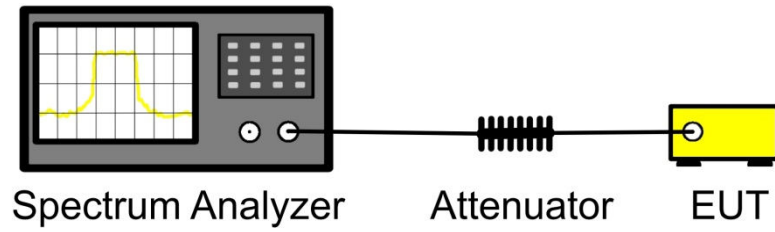
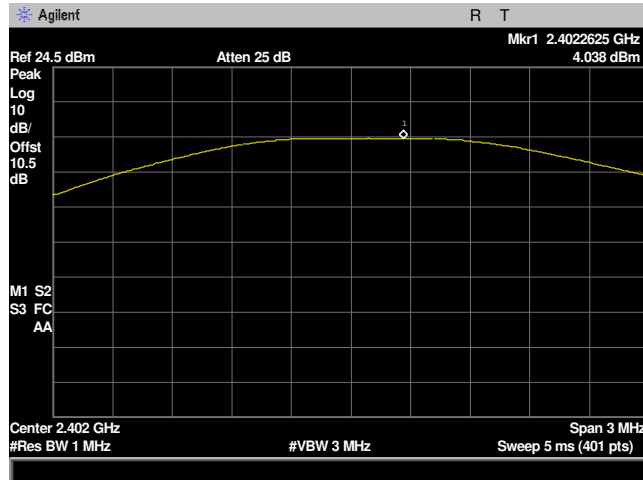


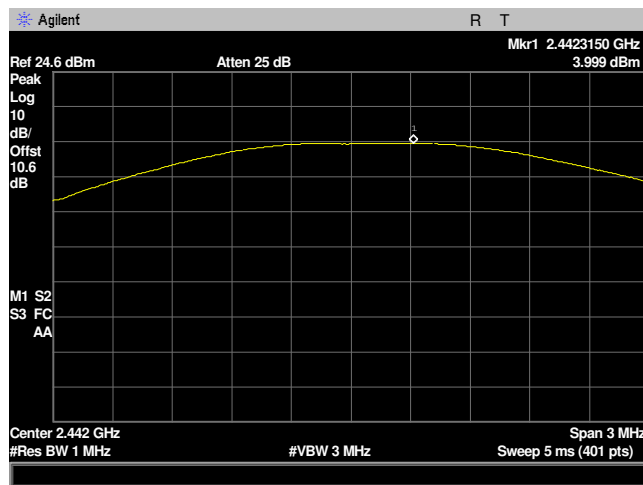
Figure 4: Peak Power Output Test Setup

| Output Power    |                 |                                |             |
|-----------------|-----------------|--------------------------------|-------------|
| Carrier Channel | Frequency (MHz) | Measured Conducted Power (dBm) | Limit (dBm) |
| Low             | 2402            | 4.038                          | $\geq 30$   |
| Mid             | 2442            | 3.999                          | $\geq 30$   |
| High            | 2480            | 4.012                          | $\geq 30$   |

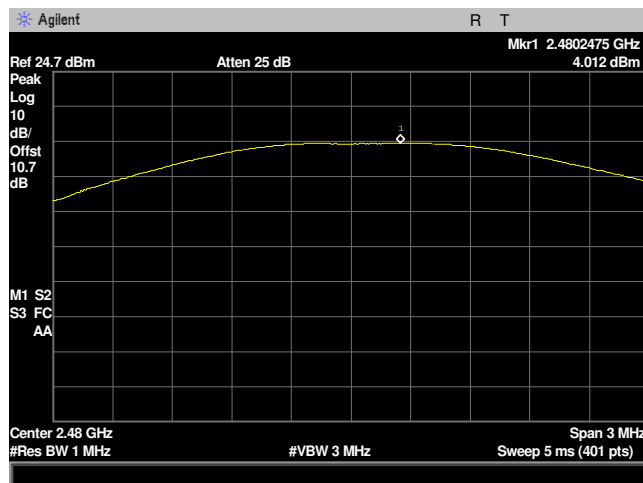
Table 14: Peak Power Output, Test Data



Plot 6: Peak Power Output, 2402MHz Low Channel



Plot 7: Peak Power Output, 2442MHz Mid Channel



Plot 8: Peak Power Output, 2480MHz High Channel



## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

**Test Requirements:** §15.247(d); §15.205: Emissions outside the frequency band.

**§15.247(d):** In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. 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).

**§15.205(a):** Except as shown in paragraph (d) of this section, 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         |
| <sup>1</sup> 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           | 3600–4400      | ( <sup>2</sup> ) |

**Table 15: Restricted Bands of Operation**

<sup>1</sup> Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

<sup>2</sup> Above 38.6

**Test Requirement(s):** § 15.209 (a): Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in Table 16:

| Frequency (MHz) | § 15.209(a), Radiated Emission Limits (dBµV) @ 3m |
|-----------------|---|
| 30 - 88         | 40.00   |
| 88 - 216        | 43.50   |
| 216 - 960       | 46.00   |
| Above 960       | 54.00   |

**Table 16: Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)**

**Test Procedures:** The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line. Only noise floor was measured below 30 MHz and above 18 GHz.

**Test Results:** The EUT **completed testing** to the requirements of § 15.247(d). No anomalies noted.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020

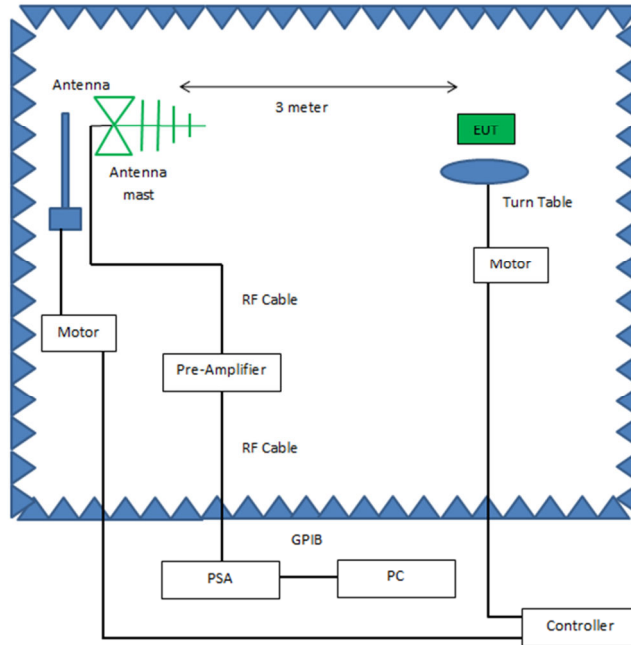


Figure 5: Radiated Emissions, Below 1GHz, Test Setup

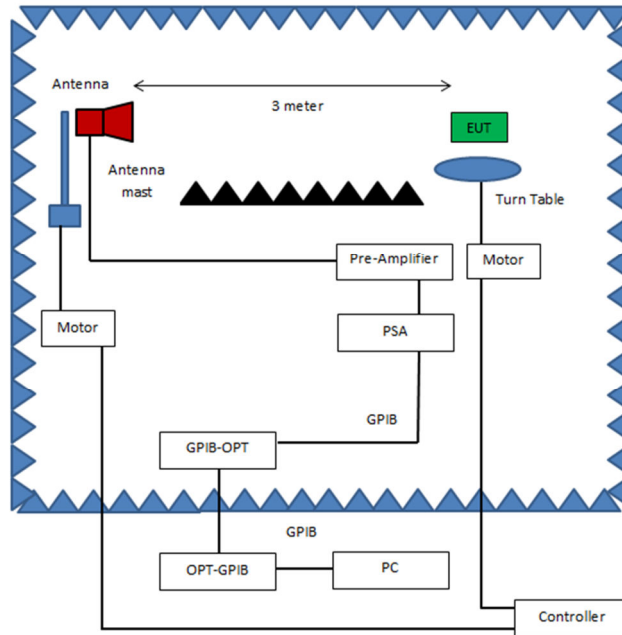
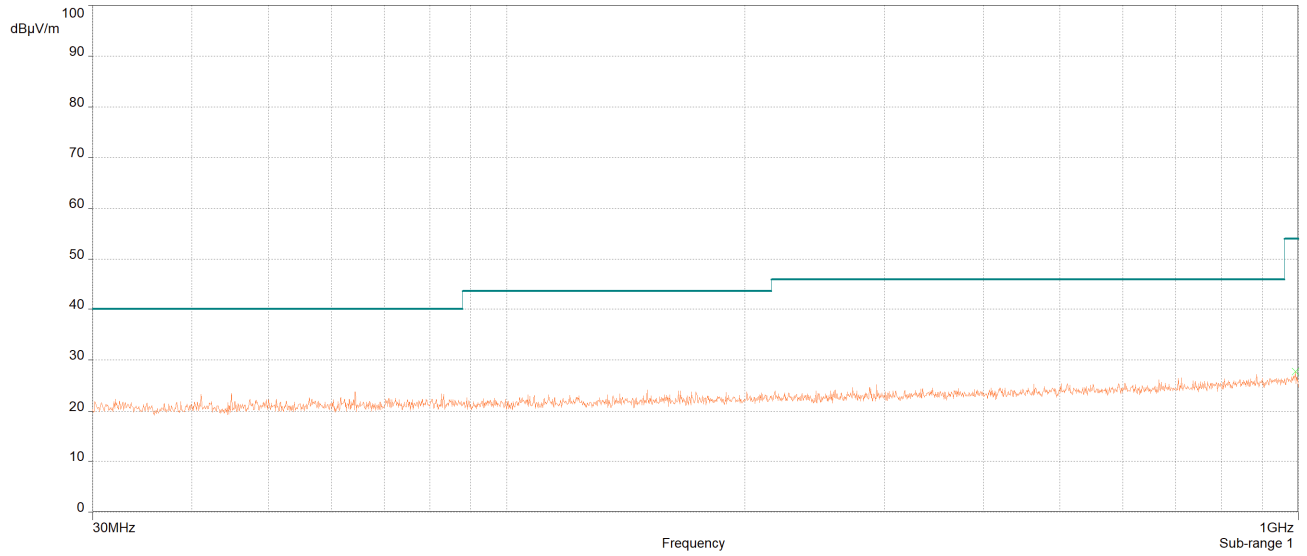
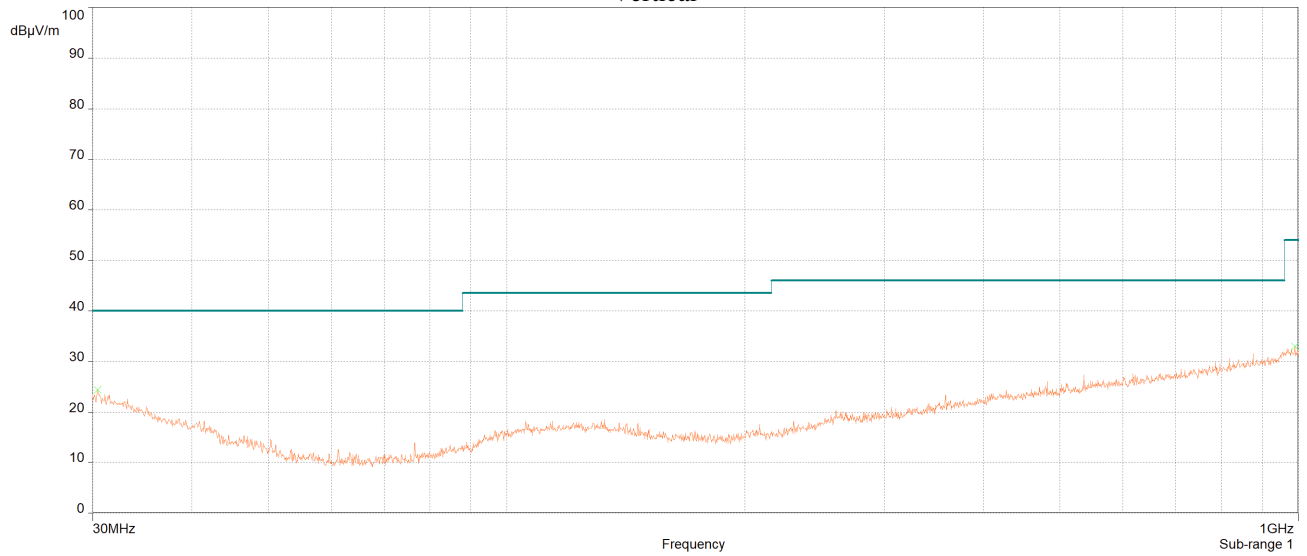


Figure 6: Radiated Emissions, Above 1GHz, Test Setup

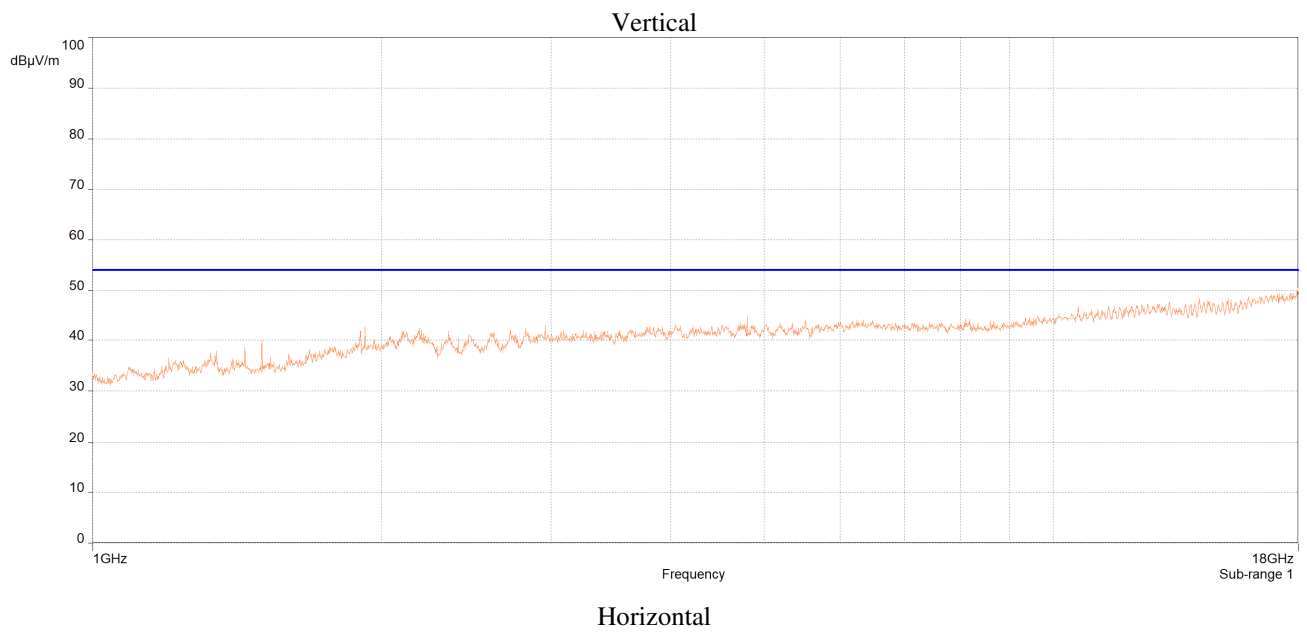
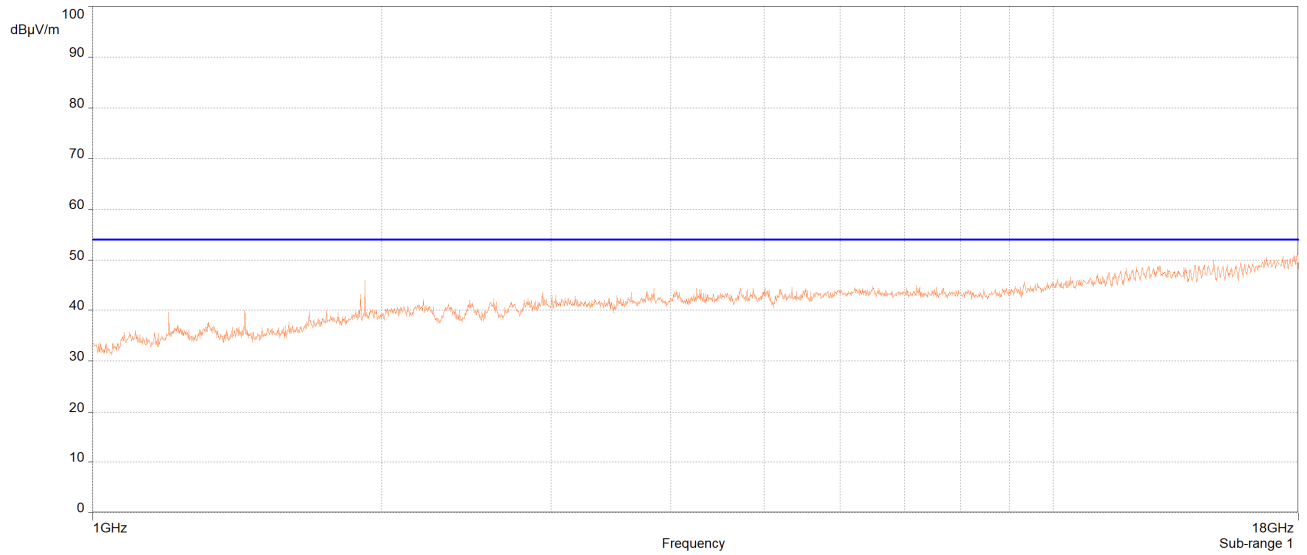


Vertical

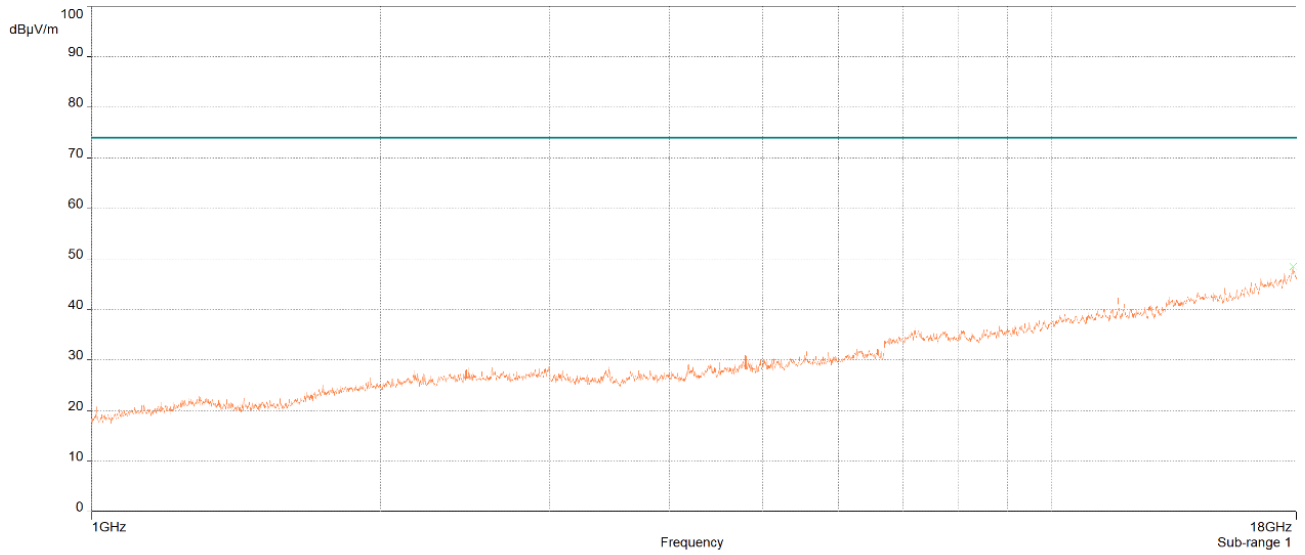


Horizontal

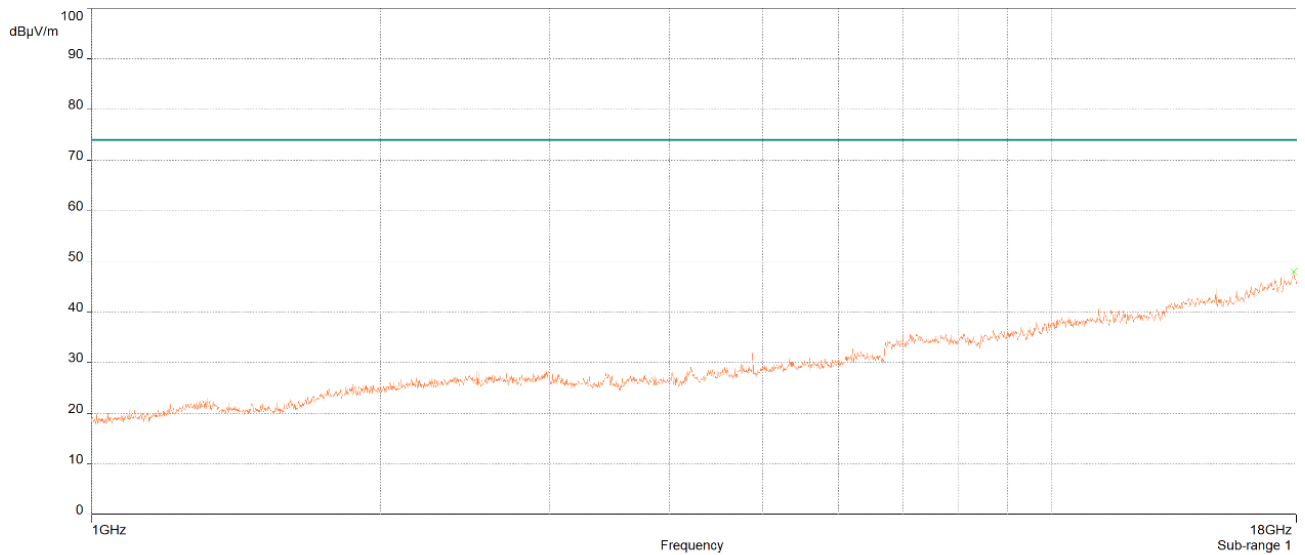
**Plot 9: Radiated Emissions, BLE, 30 MHz - 1 GHz, (worst case)**



**Plot 10: Radiated Spurious Emissions Requirements, Low Channel 2402MHz, Average**

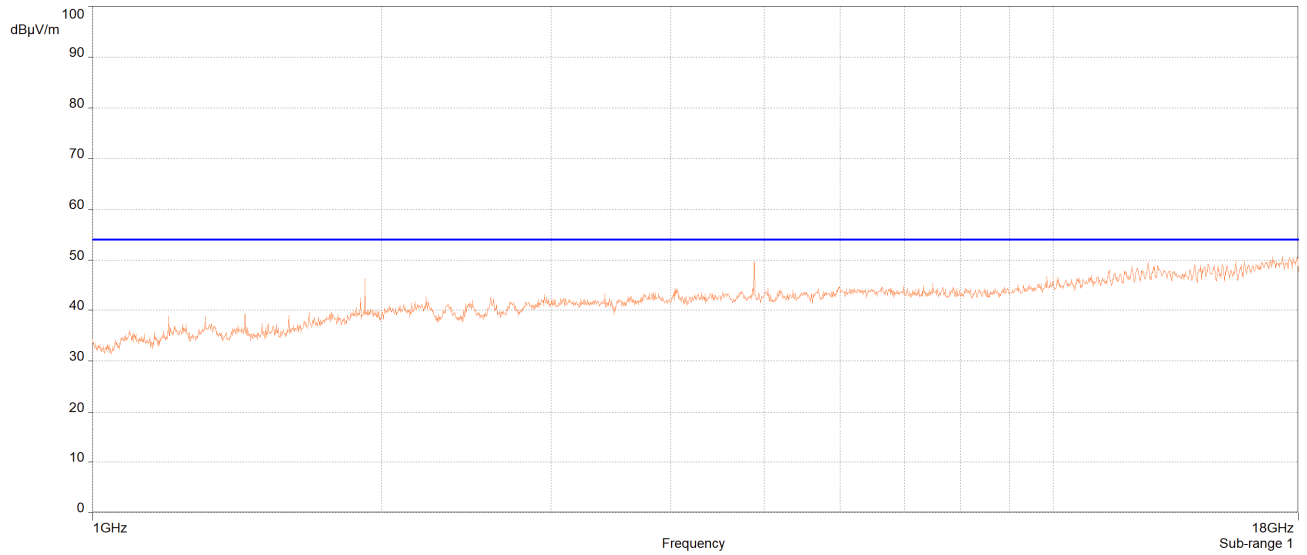


Vertical

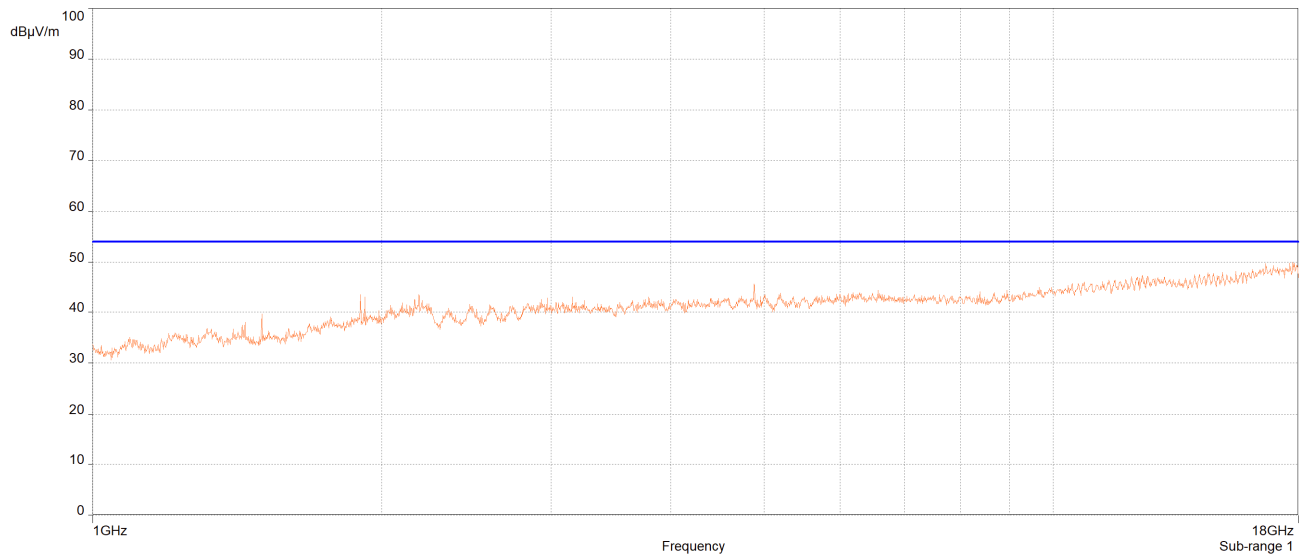


Horizontal

**Plot 11: Radiated Spurious Emissions Requirements, Low Channel 2402MHz, Peak**

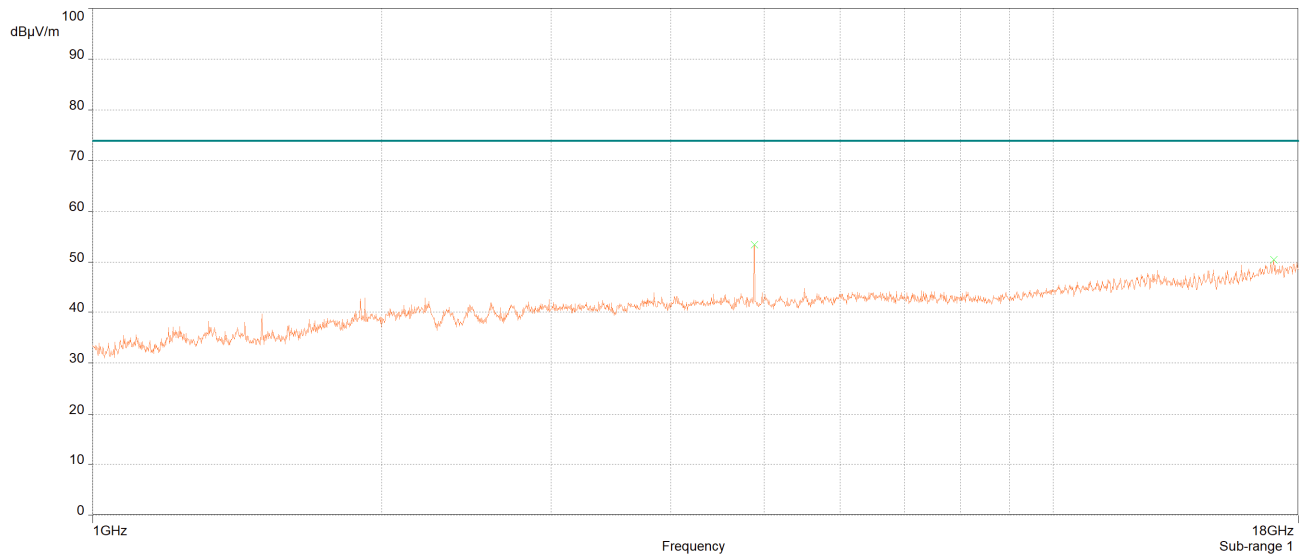
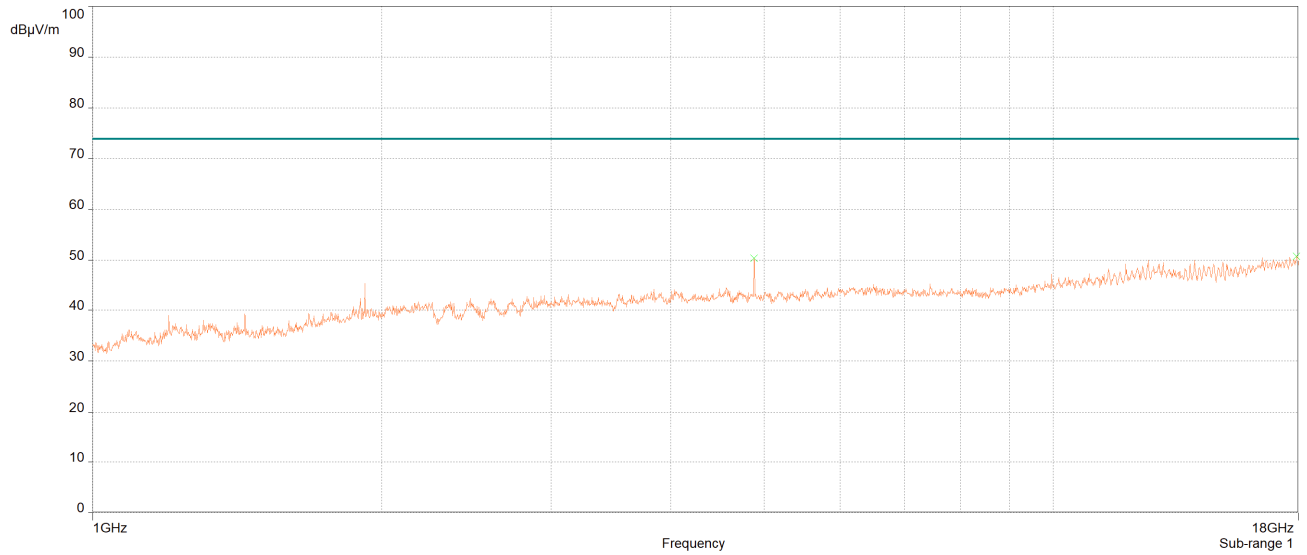


Vertical



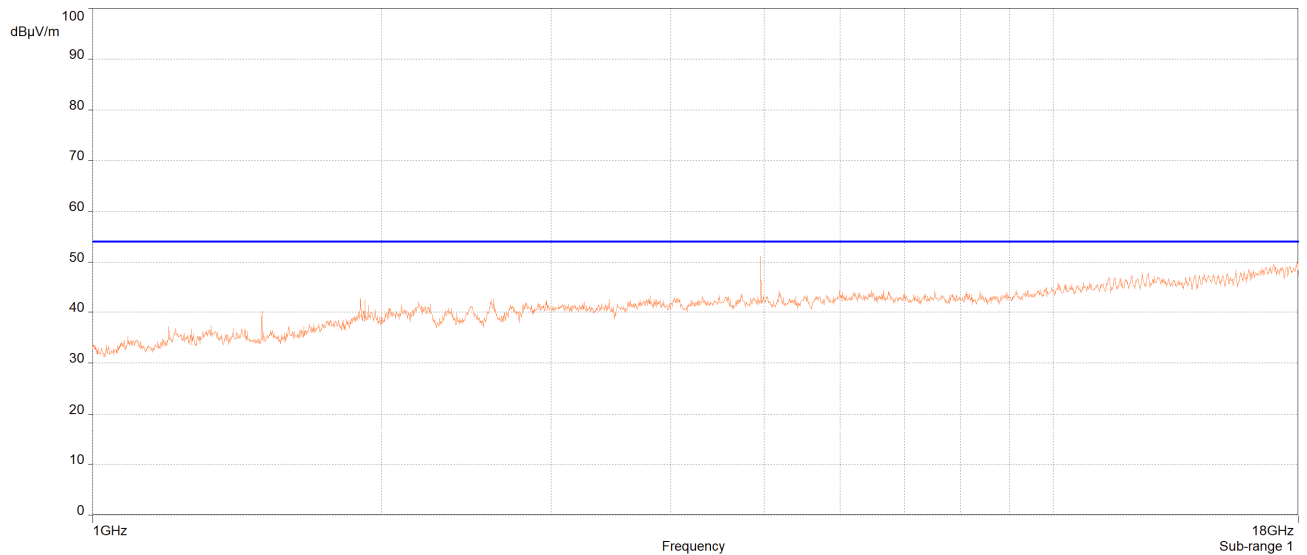
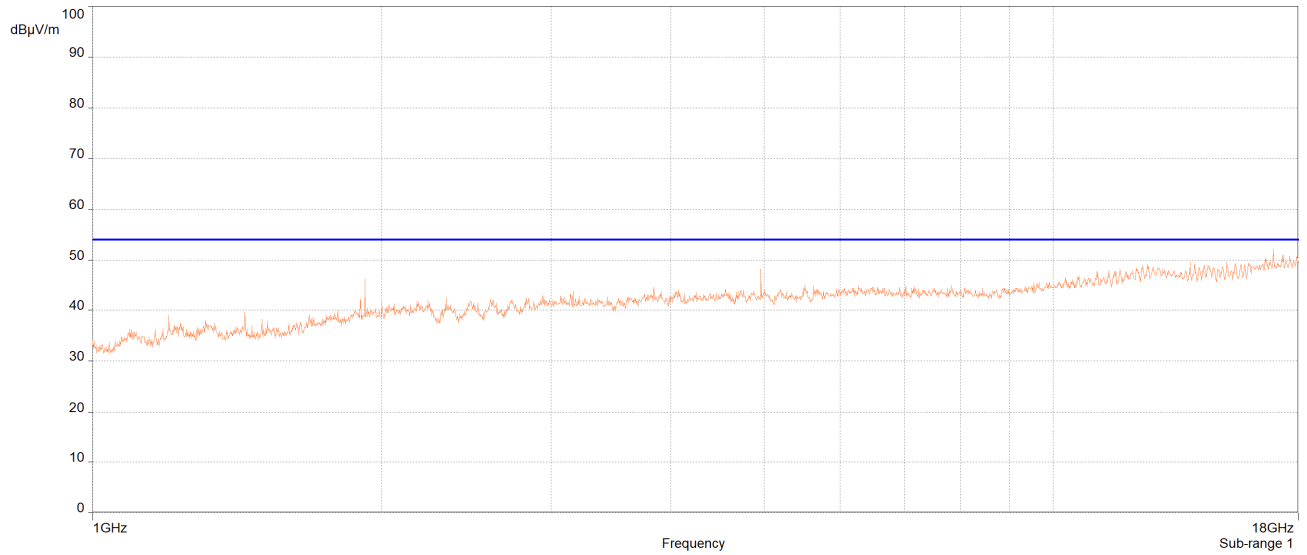
Horizontal

**Plot 12: Radiated Spurious Emissions Requirements, Mid Channel 2442MHz, Average**

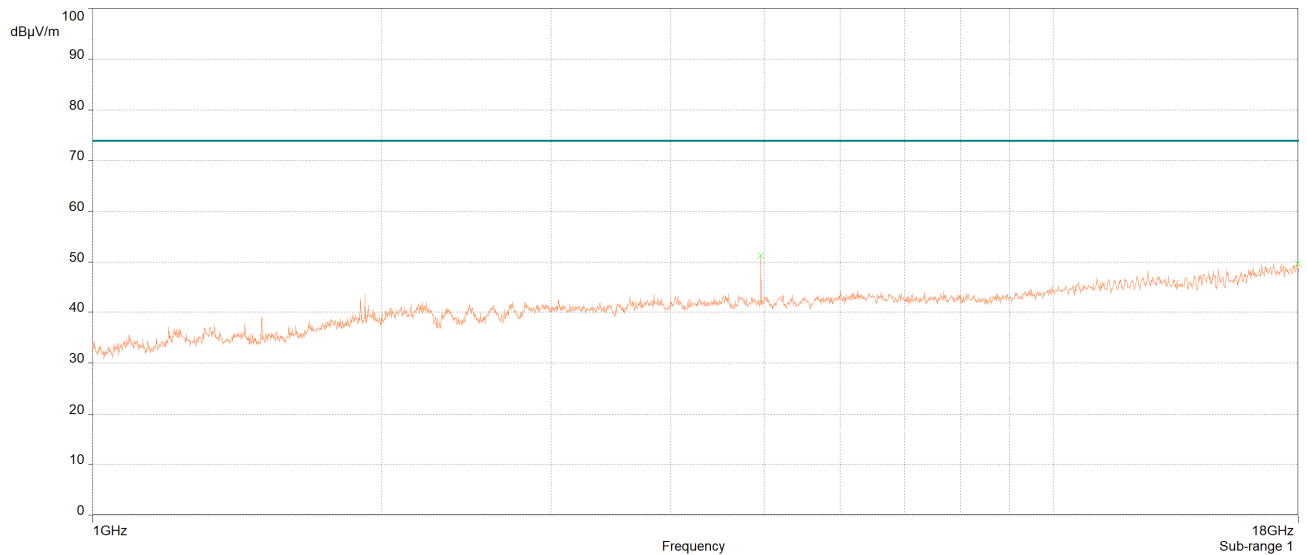
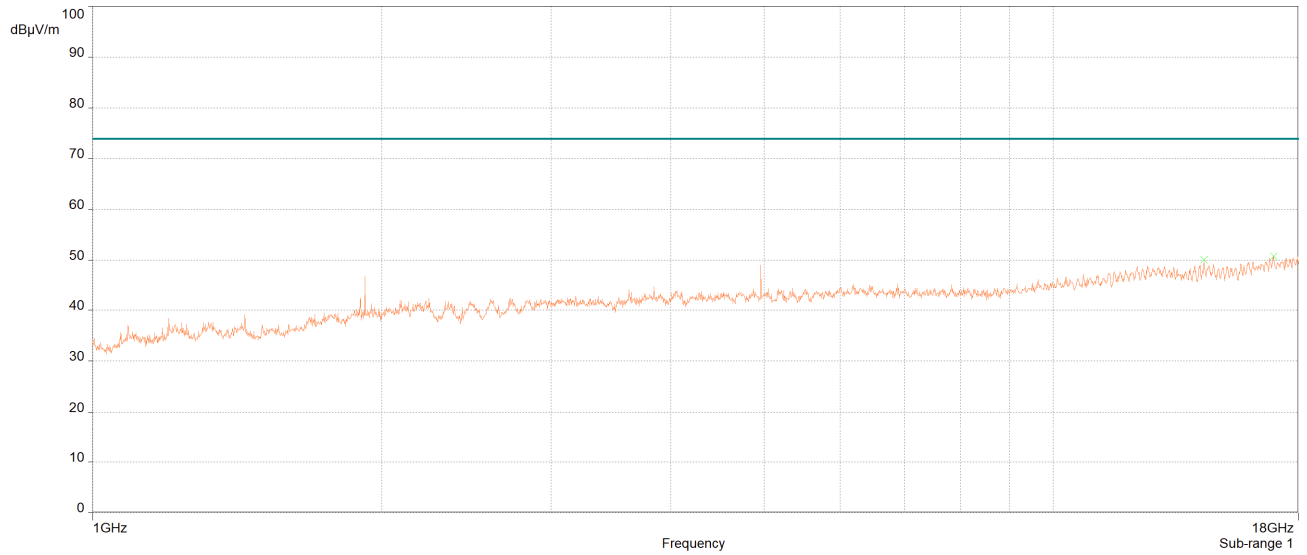


**Plot 13: Radiated Spurious Emissions Requirements, Mid Channel 2442MHz, Peak**



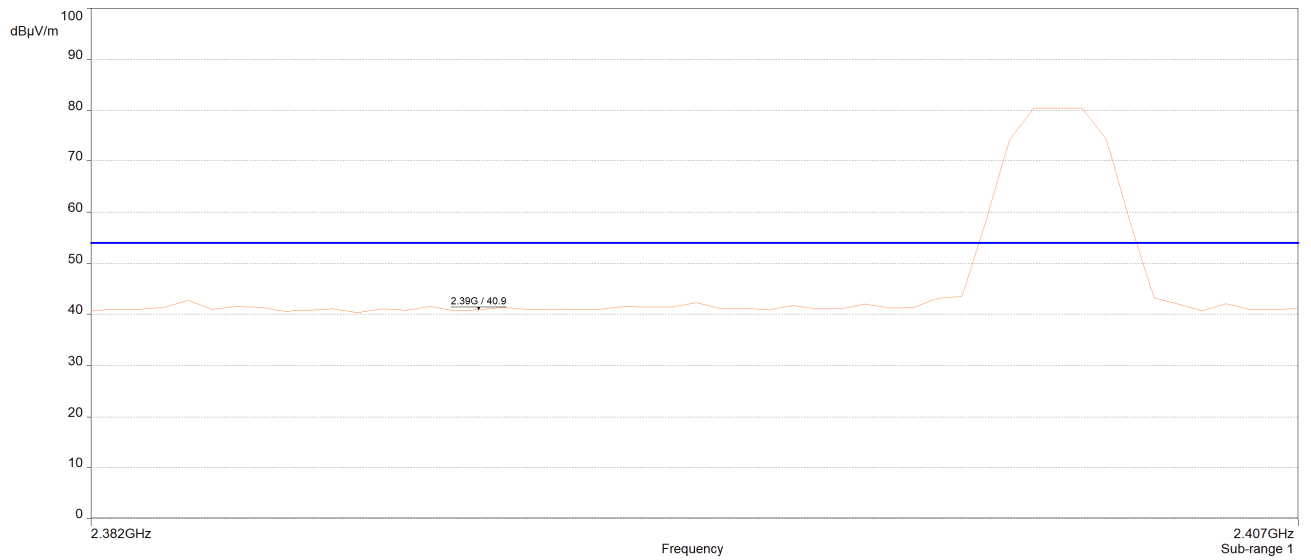
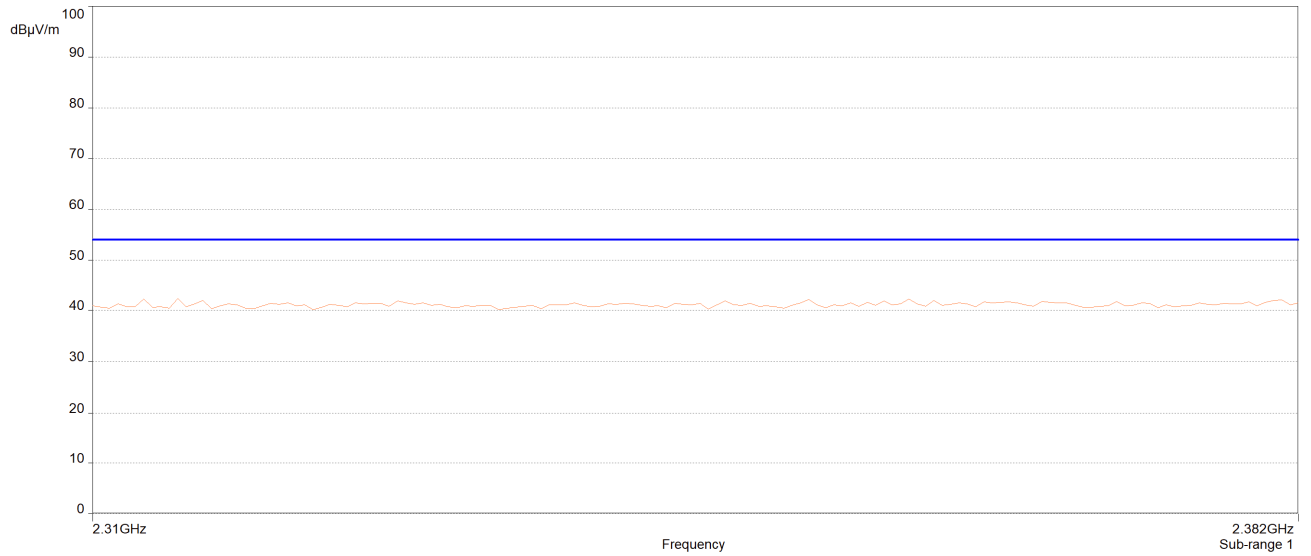


**Plot 14: Radiated Spurious Emissions Requirements, High Channel 2480MHz, Average**

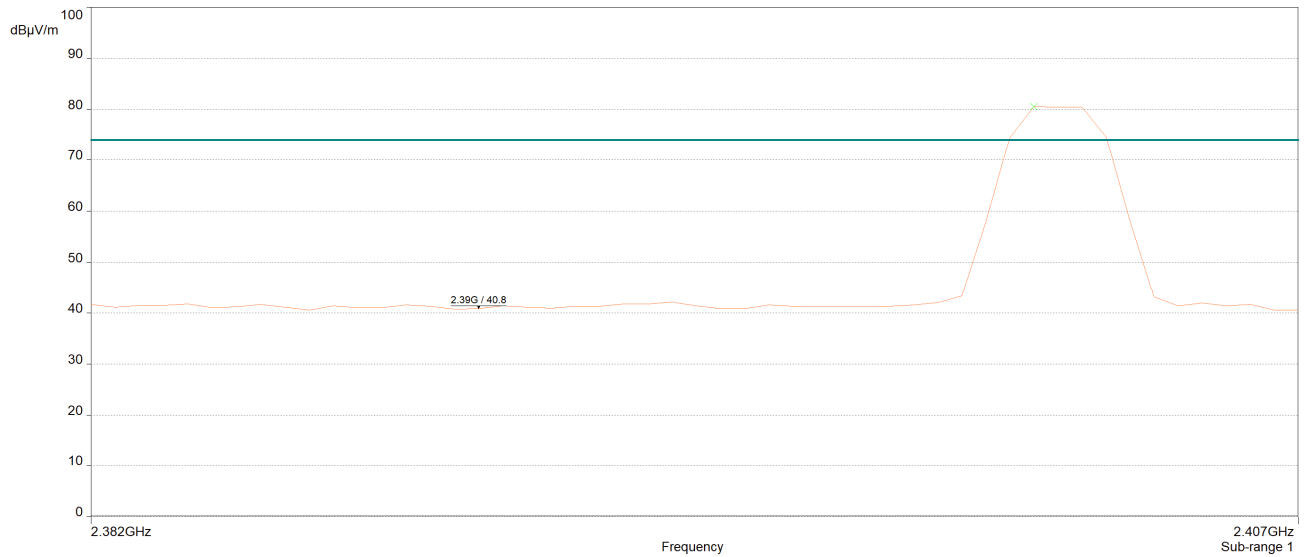
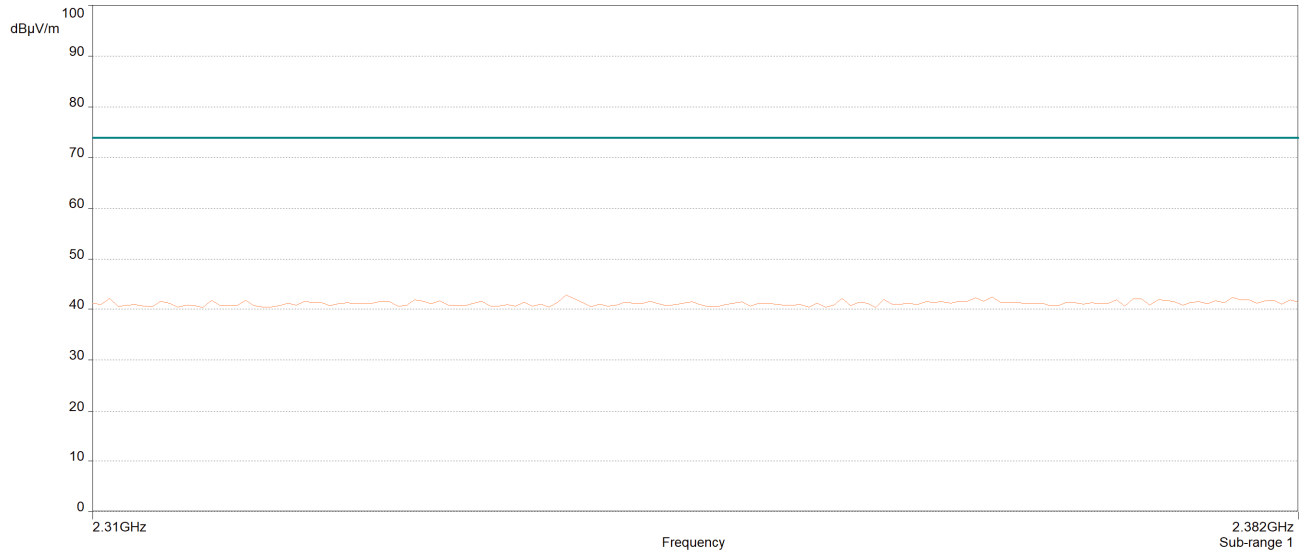


**Plot 15: Radiated Spurious Emissions Requirements, High Channel 2480MHz, Peak**

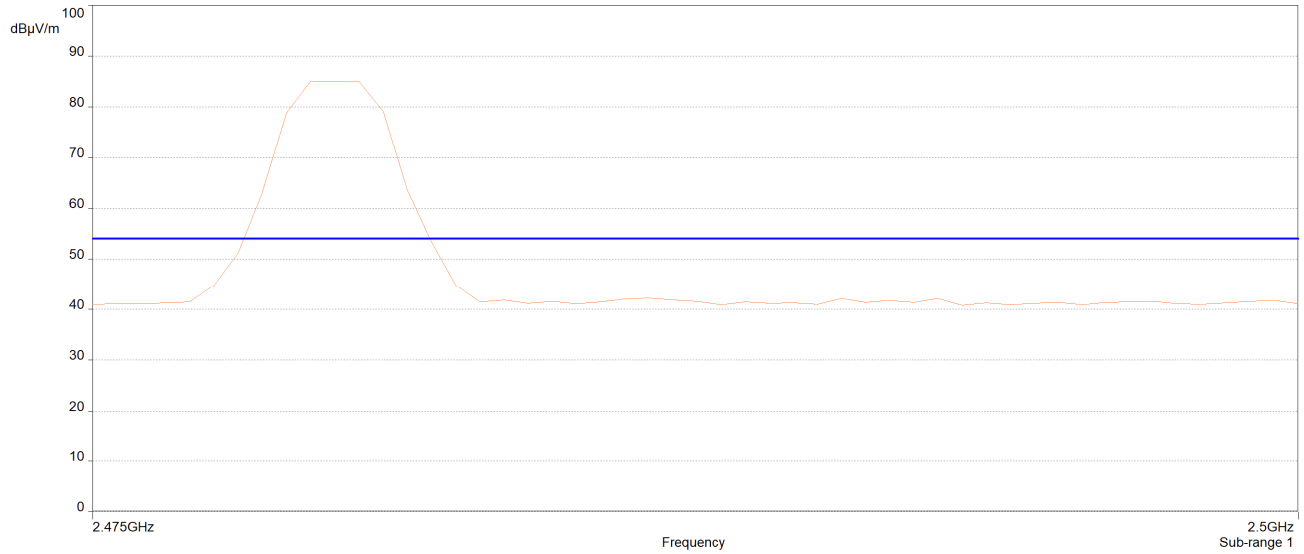
### Radiated Band Edge Measurements



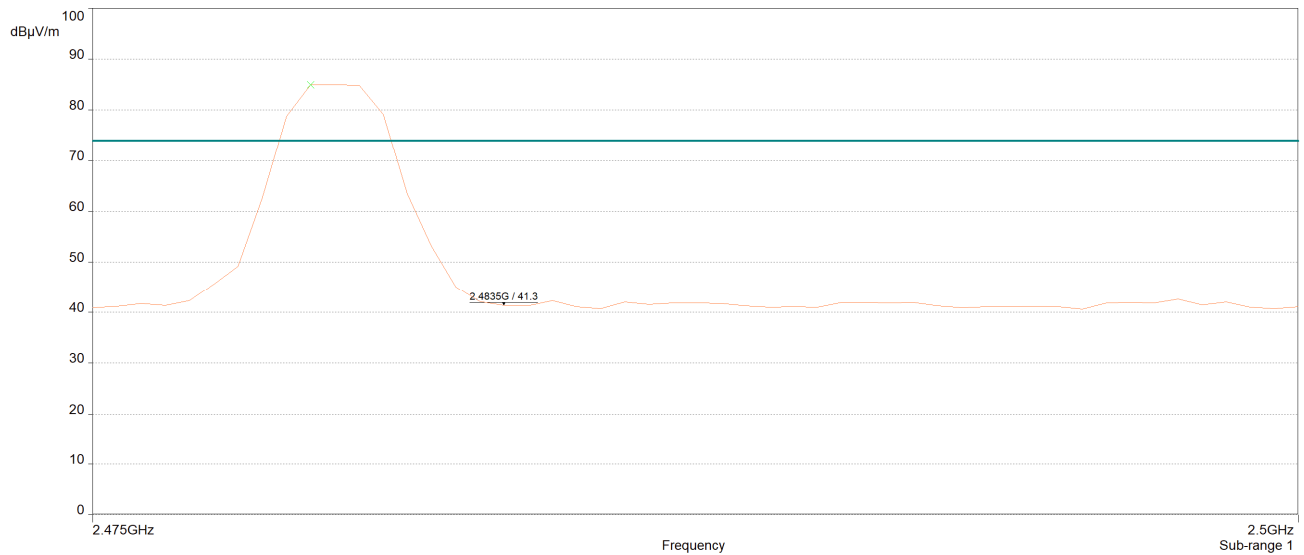
**Plot 15: Radiated Band Edge, Low Channel 2402MHz, Average (Worst Case)**



**Plot 16: Radiated Band Edge, Low Channel 2402MHz, Peak (Worse Case)**



**Plot 17: Radiated Band Edge, High Channel 2480MHz, Average (Worst Case)**



**Plot 18: Radiated Band Edge, High Channel 2480MHz, Peak (Worst Case)**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

**Test Requirement:** **15.247(d)** In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB.

**Test Procedure:** For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10<sup>th</sup> harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

See following pages for detailed test results with RF Conducted Spurious Emissions.

**Test Results:** The EUT **completed testing** to the requirements of §15.247(d). No anomalies noted.

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/25/2020

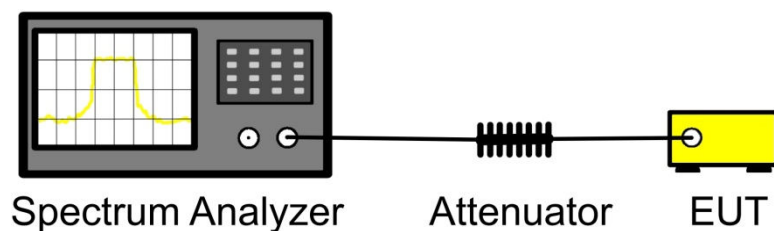
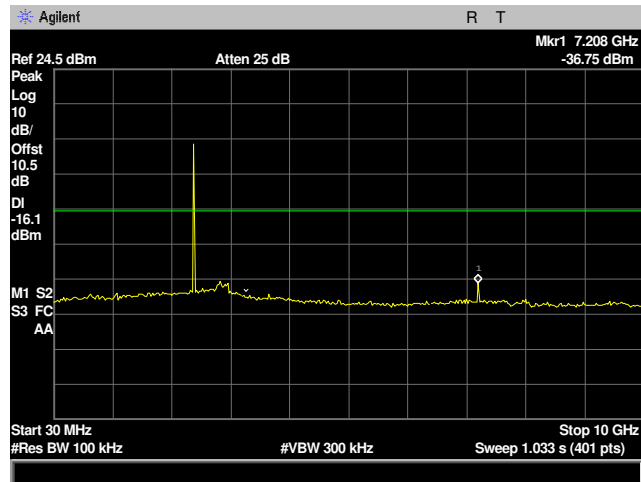
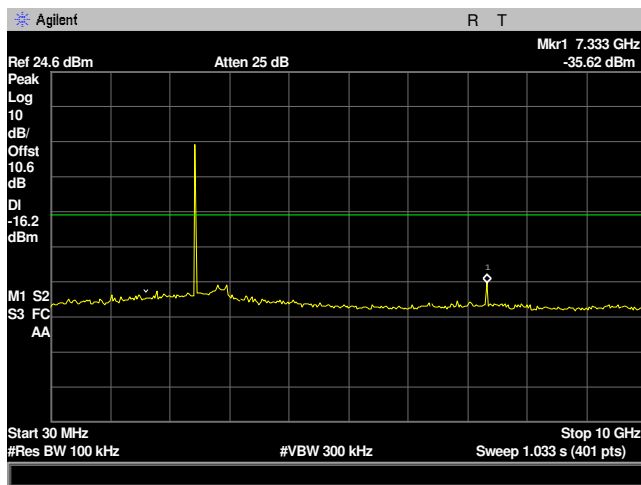


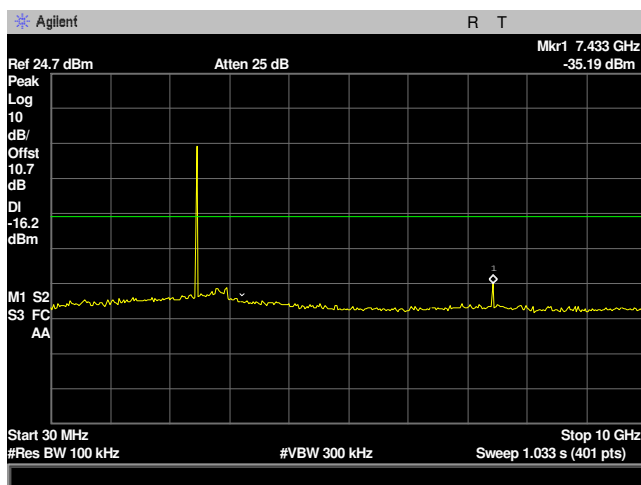
Figure 7: Block Diagram, Conducted Spurious Emissions Test Setup



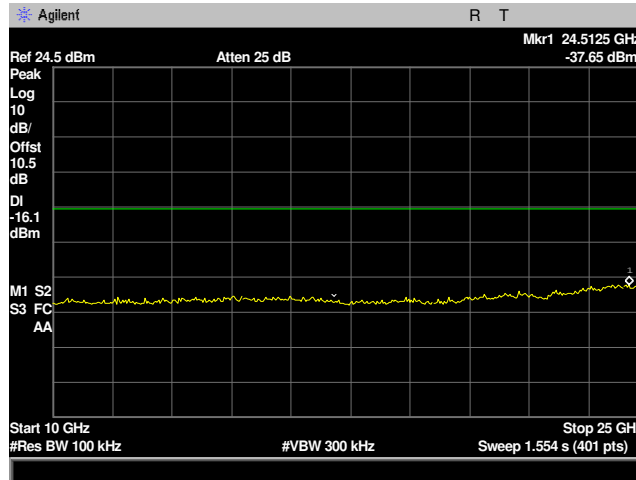
Plot 19: RF Conducted Spurious Emissions Requirements, 30MHz-10GHz 2402MHz Low Channel



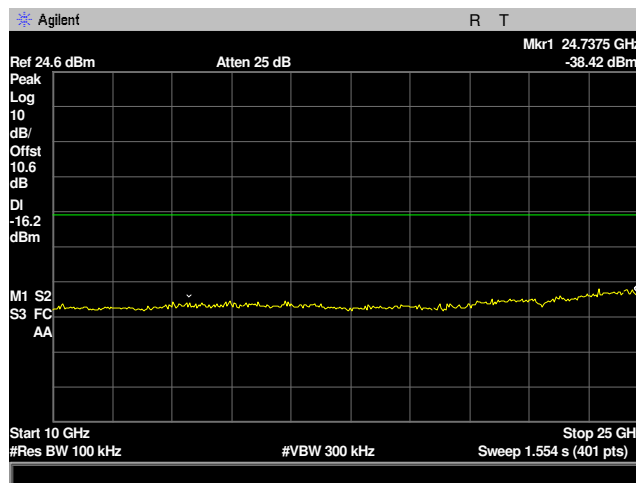
Plot 20: RF Conducted Spurious Emissions Requirements, 30MHz-10GHz 2442MHz Mid Channel



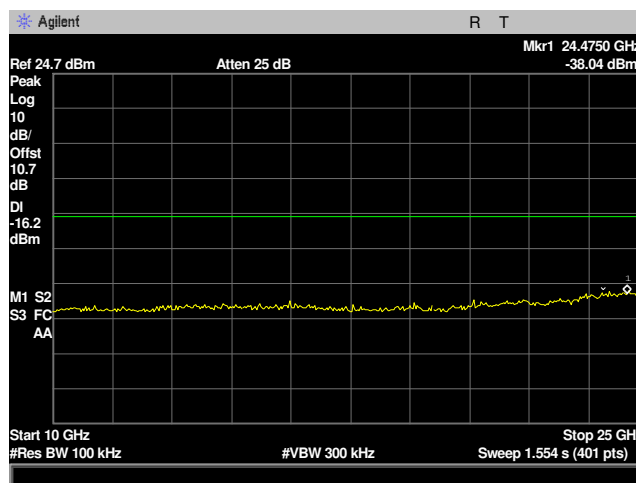
Plot 21: RF Conducted Spurious Emissions Requirements, 30MHz-10GHz 2480MHz High Channel



Plot 22: RF Conducted Spurious Emissions Requirements, 10GHz-25GHz 2402MHz Low Channel

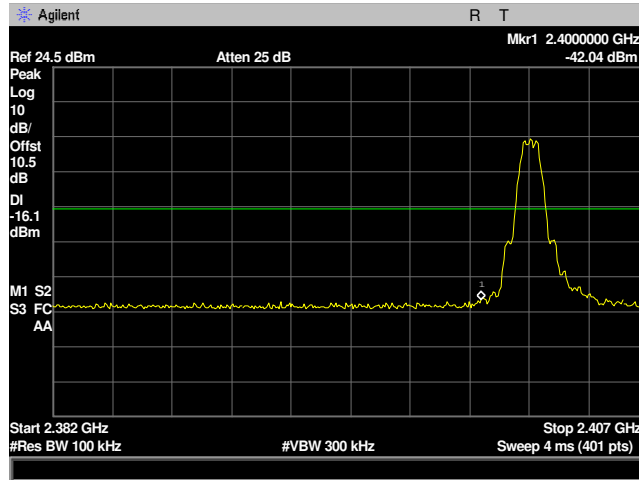


Plot 23: RF Conducted Spurious Emissions Requirements, 10GHz-25GHz 2442MHz Mid Channel

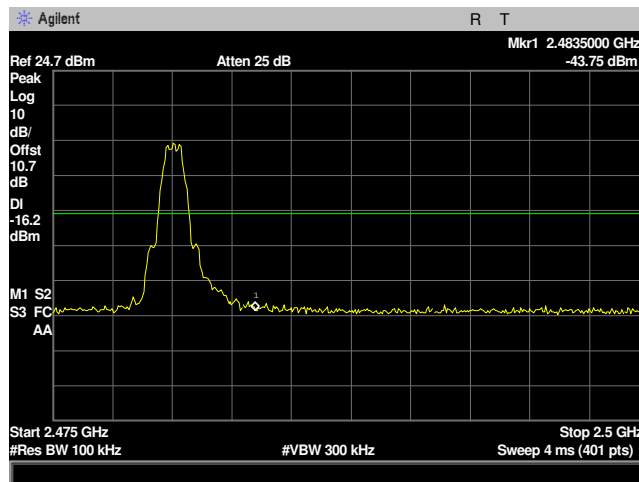


Plot 24: RF Conducted Spurious Emissions Requirements, 10GHz-25GHz 2480MHz High Channel

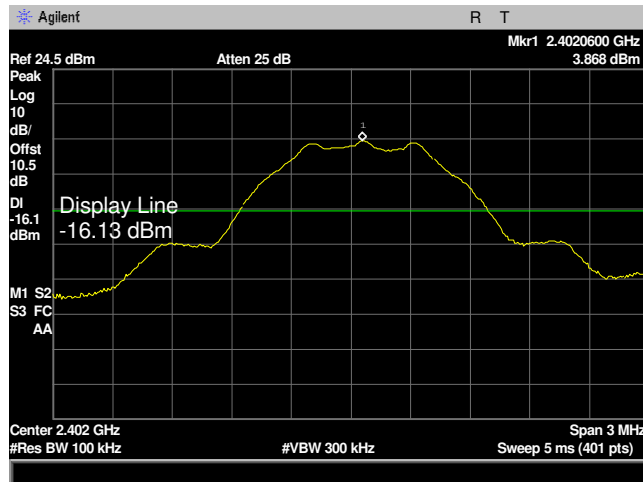




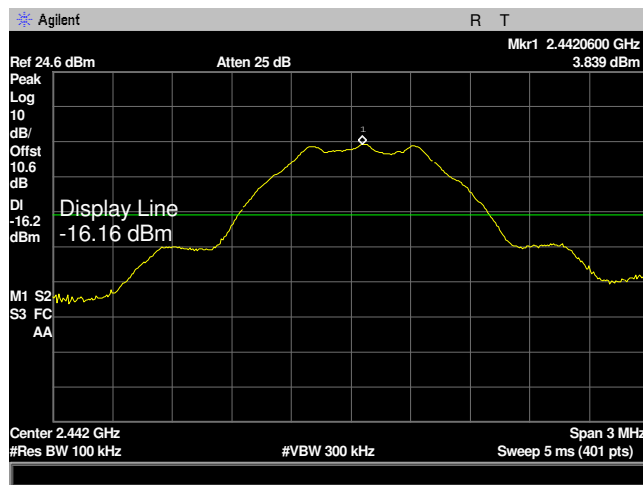
Plot 25: RF Conducted Band Edge, 2402MHz Low Channel



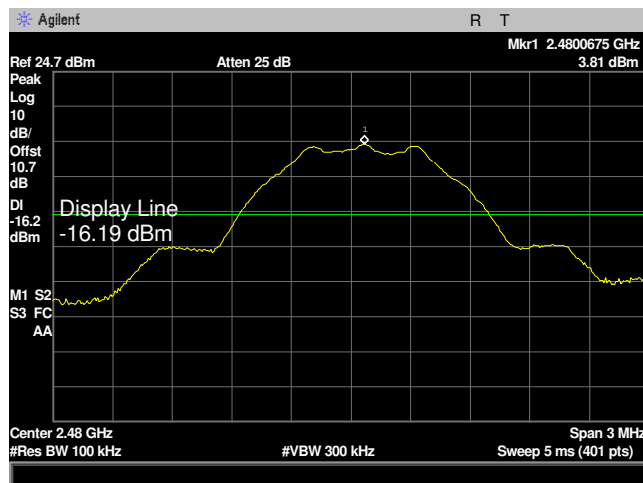
Plot 26: RF Conducted Band Edge, 2480MHz High Channel



Plot 27: RF Conducted Band Edge, Reference Level 2402MHz Low Channel



Plot 28: RF Conducted Band Edge, Reference Level 2442MHz Mid Channel



Plot 29: RF Conducted Band Edge, Reference Level 2480MHz High Channel

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(e) Peak Power Spectral Density

**Test Requirements:** §15.247(e): For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8dBm in any 3 kHz band during any time interval of continuous transmission.

**Test Procedure:** The transmitter was connected directly to a Spectrum Analyzer through an attenuator. The power level was set to the maximum level throughout each of the 100 sweeps of power averaging. The RBW was set to 3 kHz and a VBW set to 9 kHz or greater. The spectrum analyzer was set to an auto sweep time and a peak detector was used. Measurements were carried out at the low, mid and high channels.

**Test Results:** The EUT **completed testing** to the requirements of § 15.247 (e). No anomalies noted.

The peak power spectral density was determined from plots on the following page(s).

**Test Engineer(s):** Felix Huang

**Test Date(s):** 11/24/2020

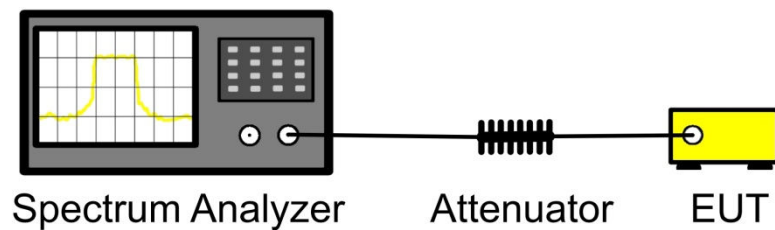
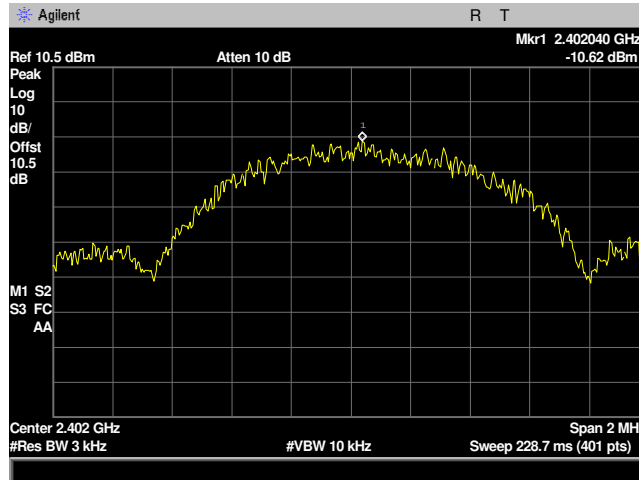


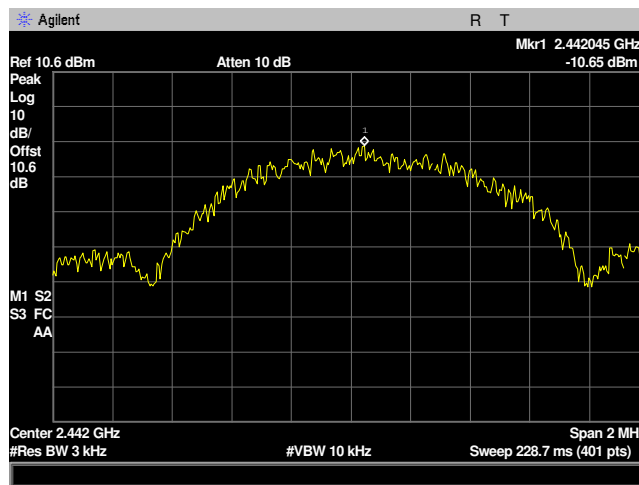
Figure 8: Block Diagram, Peak Power Spectral Density Test Setup

| Power Spectral Density |                 |                                |             |
|------------------------|-----------------|--------------------------------|-------------|
| Carrier Channel        | Frequency (MHz) | Measured Conducted Power (dBm) | Limit (dBm) |
| Low                    | 2402            | -10.62                         | 8           |
| Mid                    | 2442            | -10.65                         | 8           |
| High                   | 2480            | -10.81                         | 8           |

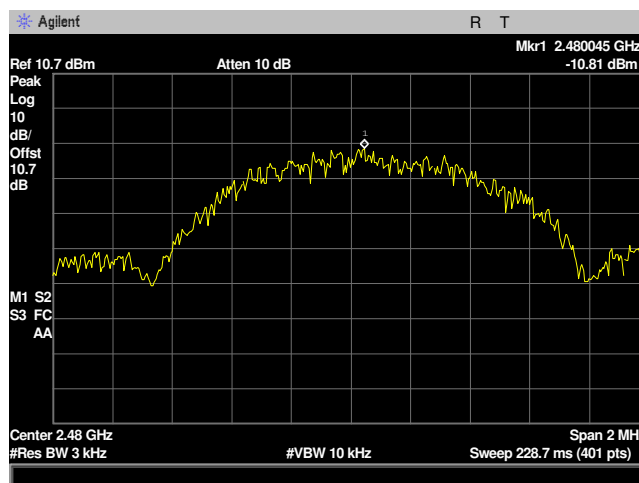
Table 17: Peak Power Output, Test Data



Plot 30: Peak Power Spectral Density, 2402MHz Low Channel



Plot 31: Peak Power Spectral Density, 2442MHz Mid Channel



Plot 32: Peak Power Spectral Density, 2480MHz High Channel

## IV. Test Equipment

## Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2017.

| ASSET # | NOMENCLATURE                    | MANUFACTURER                | MODEL                | LAST CAL          | CAL DUE    |
|---------|---------------------------------|-----------------------------|----------------------|-------------------|------------|
| 1S2399  | TURNTABLE CONTROLLER            | SUNOL SCIENCE               | SC99V                | FUNCTIONAL VERIFY |            |
| 1S3928  | EMI TESTER RECEIVER             | ROHDE & SCHWARZ             | ESR26                | 03/04/2020        | 03/04/2021 |
| 1S2600  | BILOG ANTENNA                   | TESEQ                       | CBL6112D             | 03/19/2019        | 03/19/2021 |
| 1S2486  | 5 METER CHAMBER CONTROL ROOM    | PANASHIELD                  | 5 METER CONTROL ROOM | FUNCTIONAL VERIFY |            |
| 1S3926  | 1MHZ STEP, 1GHZ COMBO GENERATOR | COM-POWER CORP              | CGO-501              | FUNCTIONAL VERIFY |            |
| 1S4067  | DIGITAL BAROMETER               | CONTROL CO                  | 6530                 | 06/22/2020        | 06/22/2022 |
| 1S2481  | 10 METER CHAMBER                | ETS-LINGREN                 | DKE-8X8 DBL          | FUNCTIONAL VERIFY |            |
| 1S380   | EMI RECEIVER                    | NARDA SAFETY TEST SOLUTIONS | PMM 9010F            | 8/23/2019         | 8/23/2021  |
| 1S2678  | LISN, DUAL LINE V-NETWORK       | TESEQ                       | NNB 51               | 8/16/2019         | 8/16/2021  |
| 1S245   | COMB GENERATOR (RADIATED)       | COM-POWER                   | GG510                | FUNCTIONAL VERIFY |            |
| 1S2599  | LASER PROBE INTERFACE           | AMPLIFIER RESEARCH          | F1700                | FUNCTIONAL VERIFY |            |
| 1S2603  | DOUBLE RIDGED WAVEGUIDE HORN    | ETS-LINDGREN                | 3117                 | 09/18/2020        | 09/18/2022 |
| 1S2000  | SPECTRUM ANALYZER               | AGILENT                     | E4448A               | 11/06/2019        | 11/06/2021 |

**Table 18: Test Equipment List**

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

**End of Report**