

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 the FCC Certification rules under Title 47 of the CFR Part 22 Subpart H for Cellular Devices and FCC Part 24 Subpart E for Broadband PCS Devices.

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

Sincerely yours,  
EUROFINS E&E NORTH AMERICA



Arsalan Hasan  
Wireless Laboratory

Reference: (\Bluecats US LLC\WIRS109093-FCC-22-24 Rev 0)



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## **Electromagnetic Compatibility Criteria Test Report**

for the

**Bluecats US LLC  
BC4520 ProxPoint**

**Tested under  
FCC Certification Rules  
Title 47 of the CFR,  
Part 22 Subpart H for Cellular Devices  
&  
Part 24 Subpart E for Broadband PCS Devices**

**Report: WIRS109093-FCC-22-24 Rev 0**

December 23, 2020

**Prepared For:**

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

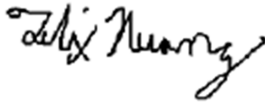
**Prepared By:  
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Part 22 Subpart H for Cellular Devices  
&  
Part 24 Subpart E for Broadband PCS Devices**



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 Part 22 Subpart H and Part 24 Subpart E of the FCC Rules 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 $\mu$ A	Decibels above one <b>microamp</b>
dB $\mu$ V	Decibels above one <b>microvolt</b>
dB $\mu$ A/m	Decibels above one <b>microamp per meter</b>
dB $\mu$ 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
$\mu$ H	microhenry
$\mu$	microfarad
$\mu$ s	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 evaluation was performed to determine compliance of the Bluecats US LLC BC4520 ProxPoint, with the requirements of Part 22 Subpart H and Part 24 Subpart E. 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 22 Subpart H and Part 24 Subpart E, in accordance with Bluecats US LLC, purchase order number PO-BCUS-00608.

FCC Reference	Description	Compliance
§2.1049; §22.917; §24.232(d)	Occupied Bandwidth	Data valid from module original certification FCC ID: XMR201707BG96
§2.1049, §22.355, §24.238	Frequency stability	Data valid from module original certification FCC ID: XMR201707BG96
§22.913(d), §24.323(d)	Peak to Average Ratio	Data valid from module original certification FCC ID: XMR201707BG96
§2.1051; §22.917, §24.238	Conducted Spurious Emissions at Antenna Terminals and Band Edge	Data valid from module original certification FCC ID: XMR201707BG96
§2.1046; §22.913(a); §24.232	RF Power Output	Data valid from module original certification FCC ID: XMR201707BG96
§2.1046; §22.913(a)(2); §24.232	Effective Radiated Power	Compliant
§2.1053; §22.917(a), §24.238	Radiated Spurious Emissions	Compliant

**Table 1. Executive Summary of EMC Compliance Testing**

**Rationale:** Per KDB KDB 996369 D04 “Modular Transmitter Integration Guide – Guidance for Host Product Manufacturers” only worst-case radiated measurements are reported in this filing.



## II. Equipment Configuration

## 2.1 Overview

Eurofins E&E North America 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			
	Module Original Report Number(s): Part 22: Report R2007A0435-R4 Date Available in FCC Database: 09/04/2020 Part 24: Report R2007A0435-R5 Date Available in FCC Database: 09/04/2020			
	Type of Modulations:	GMSK, 8PSK, QPS`K, 16QAM		
	Equipment Code:	PCB		
	Technology	TX Frequency Range	(Measured) Power Output	(Rated) Power Output
	GSM 850	824 – 849 MHz	31.09 dBm ERP	32.13 dBm ERP
	GSM 1900	1850 – 1910 MHz	28.61 dBm EIRP	32.43 dBm EIRP
	LTE CAT-M1 Band 2	1850 – 1910 MHz	28.12 dBm EIRP	29.66 dBm EIRP
	LTE CAT-M1 Band 5	824 – 849 MHz	26.88 dBm ERP	27.65 dBm ERP
LTE CAT-M1 Band 25	1850 – 1915 MHz	21.28 dBm EIRP	22.61 dBm EIRP	
<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>Date(s):</b>	December 23, 2020			

**Table 2. EUT Summary Table**

## 2.2 References

<b>CFR 47, Part 22, Subpart H</b>	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 22: Rules and Regulations for Cellular Devices.
<b>CFR 47, Part 24, Subpart E</b>	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 24: Rules and Regulations for Personal Communications Services
<b>KDB 996369 D04</b>	Modular Transmitter Integration Guide – Guidance For Host Product Manufacturers
<b>ANSI C63.4:20014</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>ANSI C63.26: 2015</b>	Compliance Testing of Transmitters Used in Licensed Radio Services
<b>ISO/IEC 17025:2017</b>	General Requirements for the Competence of Testing and Calibration Laboratories
<b>EIA/TIA-603-D-2010</b>	Land Mobile FM or PM Communication Equipment Measurement and Performance Standards
<b>KDB 971168 v02r02</b>	Measurement Guidance For Certification Of Licensed Digital Transmitters

Table 3. References

## 2.3 Test Site

All testing was performed at Eurofins E&E North America, 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.

Radiated Emissions measurements were performed in a 10 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

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

## 2.4 Measurement Uncertainty

Test Method	Typical Expanded Uncertainty	K	Confidence Level
<b>RF Frequencies</b>	±4.52 Hz	2	95%
<b>RF Power Conducted Emissions</b>	±2.32 dB	2	95%
<b>RF Power Conducted Spurious Emissions</b>	±2.25 dB	2	95%
<b>RF Power Radiated Emissions</b>	±3.01 dB	2	95%
<b>Radiated Emissions, (30 MHz – 1 GHz)</b>	±3.24	2	95%
<b>Radiated Emissions, (1 - 25 GHz)</b>	±3.92	2	95%
<b>Conducted Emission</b>	±3.53	2	95%
<b>CEV Telecom Port</b>	±2.44	2	95%

Table 4. Uncertainty Calculations Summary

## 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

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

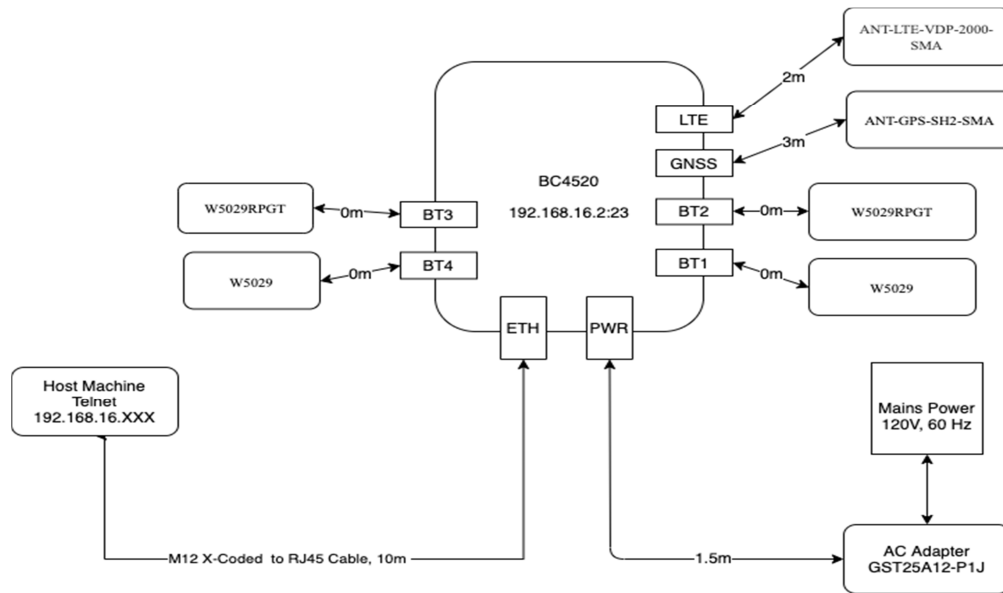


Figure 1: EUT configuration

## 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.

The BC4520 ProxPoint was paired with CMW500 and the callbox on screen indication was used to monitor proper connection.

## 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

### § 2.1046 Radiated Output Power

**Test Requirements:** § 22.913(a)(2): Extend coverage on a secondary basis into cellular unserved areas, as those areas are defined in §22.949, the ERP of base transmitters and cellular repeaters of such systems must not exceed 1000 Watts. The ERP of mobile transmitters and auxiliary test transmitters must not exceed 7 Watts.

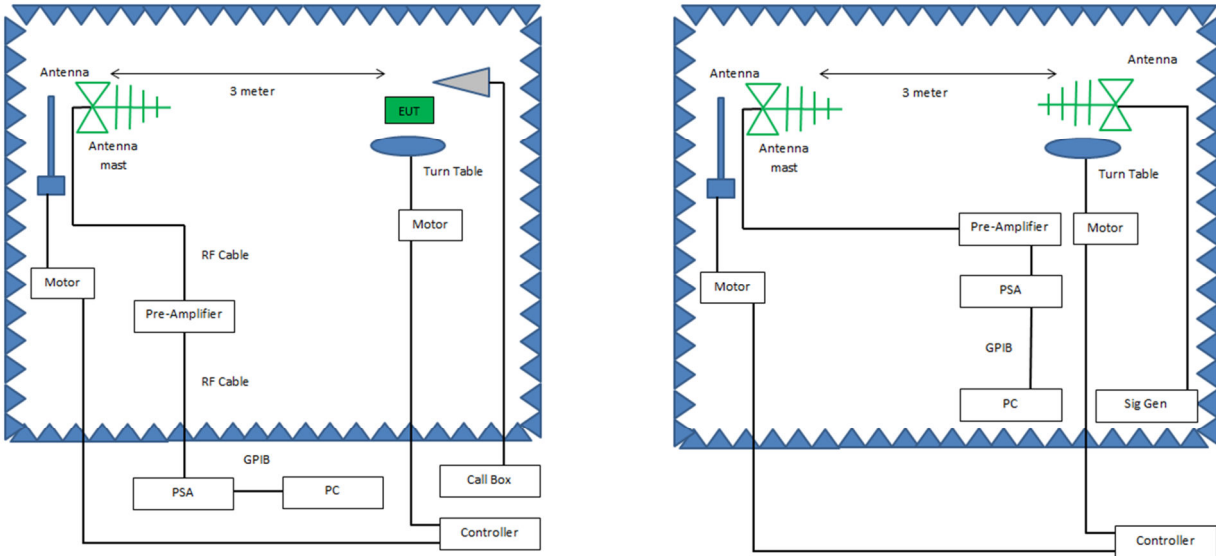
§ 24.232 (c): Mobile and portable stations are limited to 2 watts EIRP and the equipment must employ a means for limiting power to the minimum necessary for successful communications.

**Test Procedures:** The EUT was tested according to the average power integration procedures of ANSI C63.26 (2015) 5.5.3.

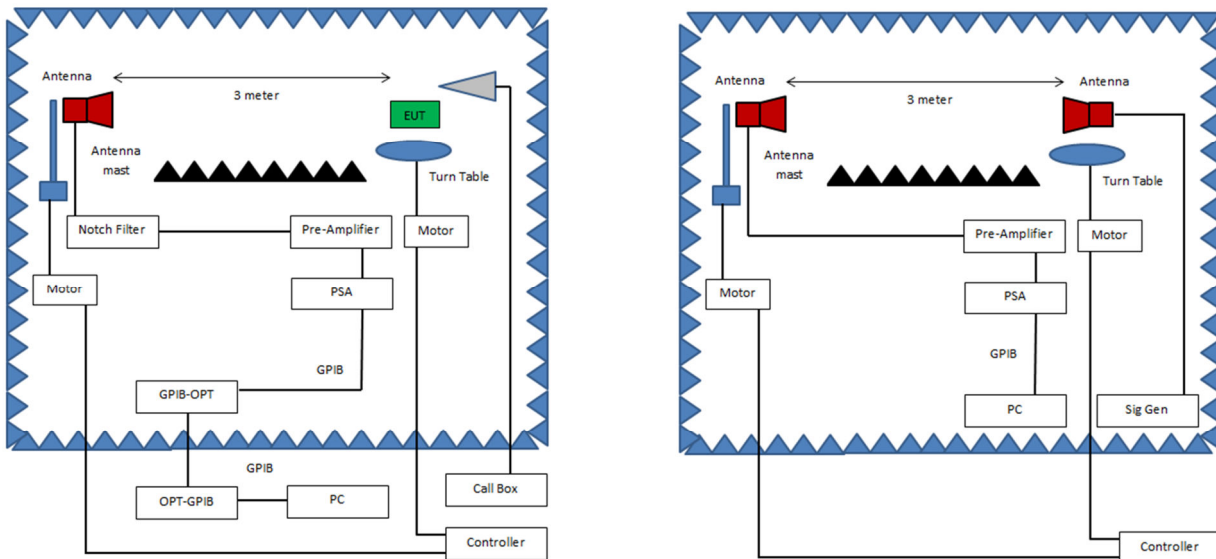
Radiated measurements shall be performed using the test arrangement shown in Figure . After a direct field strength measurement of the maximum emission amplitude level (maximized as described previously), a signal generator and transmit antenna are substituted in place of the EUT, as shown in Figure 7. The output power of the signal generator is adjusted to replicate the maximized signal amplitude measured in the direct field strength measurement. The signal generator power setting is then used to determine the ERP or EIRP of the EUT spurious emission(s). These measurements shall be performed in accordance with the common requirements specified in 5.5.2 and the specific requirements provided in this subclause.

A step-by-step procedure is as follows.

- a) Place the EUT in the center of the turntable. The EUT shall be configured to transmit into the standard non-radiating load (for measuring radiated spurious emissions), connected with cables of minimal length unless specified otherwise. If the EUT uses an adjustable antenna, the antenna shall be positioned to the length that produces the worst case emission at the fundamental operating frequency.
- b) Each emission under consideration shall be evaluated:
  - 1) Raise and lower the measurement antenna in accordance 5.5.2, as necessary to enable detection of the maximum emission amplitude relative to measurement antenna height.
  - 2) Rotate the EUT through 360° to determine the maximum emission level relative to the axial position.
  - 3) Return the turntable to the azimuth where the highest emission amplitude level was observed.
  - 4) Vary the measurement antenna height again through 1 m to 4 m again to find the height associated with the maximum emission amplitude.
  - 5) Record the measured emission amplitude level and frequency using the appropriate RBW.
- c) Repeat step b) for each emission frequency with the measurement antenna oriented in both the horizontal and vertical polarizations to determine the orientation that gives the maximum emissions amplitude.
- d) Set-up the substitution measurement with the reference point of the substitution a antenna located as near as possible to where the center of the EUT radiating element was located during the initial EUT measurement.



**Figure 2. ERP / EIRP, Block Diagram, Test Setup Below 1GHz**



**Figure 3. ERP / EIRP, Block Diagram, Test Setup Above 1GHz**



- e) Maintain the previous measurement instrument settings and test set-up, with the exception that the EUT is removed and replaced by the substitution antenna.
- f) Connect a signal generator to the substitution antenna; locate the signal generator so as to minimize any potential influences on the measurement results. Set the signal generator to the frequency where emissions are detected, and set an output power level such that the radiated signal can be detected by the measurement instrument, with sufficient dynamic range relative to the noise floor.
- g) For each emission that was detected and measured in the initial test [i.e., in step b) and step c)]:
  - 1) Vary the measurement antenna height between 1 m to 4 m to maximize the received (measured) signal amplitude.
  - 2) Adjust the signal generator output power level until the amplitude detected by the measurement instrument equals the amplitude level of the emission previously measured directly in step b) and step c).
  - 3) Record the output power level of the signal generator when equivalence is achieved in step 2).
- h) Repeat step e) through step g) with the measurement antenna oriented in the opposite polarization.
- i) Calculate the emission power in dBm referenced to a half-wave dipole using the following equation:

$$P_e = P_s(\text{dBm}) - \text{cable loss (dB)} + \text{antenna gain (dBd)}$$

where

$P_e$  = equivalent emission power in dBm

$P_s$  = source (signal generator) power in dBm

NOTE—dBd refers to the measured antenna gain in decibels relative to a half-wave dipole.

- j) Correct the antenna gain of the substitution antenna if necessary to reference the emission power to a half-wave dipole. When using measurement antennas with the gain specified in dBi, the equivalent dipole-referenced gain can be determined from: gain (dBd) = gain (dBi) - 2.15 dB. If necessary, the antenna gain can be calculated from calibrated antenna factor information

**Test Results:** The EUT was found compliant with the requirements of this section.

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

**Test Date(s):** 12/05/2020

**Test Results**

GSM 850		Conducted Power (dBm)		
		Channel 128	Channel 190	Channel 251
		824.2 (MHz)	836.6 (MHz)	848.8 (MHz)
GPRS (GMSK)	1TXslot	32.25	32.28	32.31
	2TXslots	32.11	32.05	32.10
	3TXslots	31.21	31.26	31.31
	4TXslots	30.01	30.11	30.28
EGPRS (8PSK)	1TXslot	26.58	26.65	26.78
	2TXslots	26.51	26.48	26.61
	3TXslots	26.27	26.28	26.42
	4TXslots	26.05	26.06	26.19

Table 8. Module Original Conducted Powers from Module Report R2007A0435-R4

**Note:**

Highest conducted power listed in green. Channels with highest conducted power were selected for spot checking.

Mode	Freq. (MHz)	SG (dBm)	CL (dB)	AG (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
GSM 850 – GPRS (GMSK)	848.8	30.34	0.90	3.8	Vertical	31.09	38.45	7.36
GSM 850 – EGPRS (8PSK)	848.8	25.27	0.90	3.8	Vertical	26.02	38.45	12.43

Table 9. ERP, Test Results, Part 22, GSM 850

**Note:**

EIRP = SG – CL + AG  
ERP = EIRP – 2.15

Mode	Bandwidth	Channel/ Frequency (MHz)	Index	RB# RBstart	Conducted Power (dBm)	
					QPSK	16QAM
Band 5	10 MHz	20450/829	3	1#0	22.64	23.74
			0	4#0	22.65	22.65
		20525/836.5	0	1#0	23.08	22.60
			0	4#0	22.65	23.16
		20600/844	4	1#5	23.19	23.09
			7	4#2	22.81	22.97

Table 10. Module Original Conducted Powers from Module Report R2007A0435-R4

**Note:**

Highest conducted power listed in green. Channels with highest conducted power were selected for spot checking.

Mode	Freq. (MHz)	SG (dBm)	CL (dB)	AG (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
LTE Band 5 10 MHz BW QPSK	844.0	25.56	0.90	3.7	Vertical	26.21	38.45	12.24
LTE Band 5 10 MHz BW 16QAM	829.0	26.38	0.85	3.5	Vertical	26.88	38.45	11.57

Table 11. ERP, Test Results, Part 22, LTE Band 5

**Note:**

$$EIRP = SG - CL + AG$$

$$ERP = EIRP - 2.15$$

GSM 1900		Conducted Power (dBm)		
		Channel 512	Channel 661	Channel 810
		1850.2 (MHz)	1880 (MHz)	1909.8 (MHz)
GPRS (GMSK)	1TXslot	29.76	29.66	29.46
	2TXslots	29.65	29.57	29.38
	3TXslots	29.51	29.45	29.27
	4TXslots	29.42	29.32	29.16
EGPRS (8PSK)	1TXslot	26.06	25.88	25.84
	2TXslots	25.89	25.81	25.68
	3TXslots	25.78	25.64	25.49
	4TXslots	25.57	25.45	25.38

Table 12. Module Original Conducted Powers from Module Report R2007A0435-R5

**Note:**

Highest conducted power listed in green. Channels with highest conducted power were selected for spot checking.

Mode	Freq. (MHz)	SG (dBm)	CL (dB)	AG (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
GSM 1900 – GPRS (GMSK)	1850.2	-0.47	1.33	30.413	Vertical	28.61	33	4.38
GSM 1900 - EGPRS (8PSK)	1850.2	-5.03	1.33	30.413	Vertical	24.05	33	8.94

Table 13. EIRP, Test Results, Part 24, GSM 1900

**Note:**

EIRP = SG – CL + AG  
ERP = EIRP – 2.15

Mode	Bandwidth	Channel/ Frequency (MHz)	Index	RB# RBstart	Conducted Power (dBm)	
					QPSK	16QAM
Band 2	10 MHz	18650/1855	3	1#0	23.26	23.82
			0	4#0	23.51	23.56
		18900/1880	0	1#0	23.40	23.84
			0	4#0	23.60	23.77
		19150/1905	4	1#5	23.75	23.86
			7	4#2	23.75	23.76

Table 14. Module Original Conducted Powers from Module Report R2007A0435-R5

**Note:**

Highest conducted power listed in green. Channels with highest conducted power were selected for spot checking.

Mode	Freq. (MHz)	SG (dBm)	CL (dB)	AG (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
LTE Band 2 10 MHz BW QPSK	1905.0	-3.04	1.37	30.651	Vertical	26.16	33	6.83
LTE Band 2 10 MHz BW 16QAM	1905.0	-1.16	1.37	30.651	Vertical	28.12	33	4.87

Table 15. EIRP, Test Results, Part 24, LTE Band 2

Mode	Bandwidth	Channel/ Frequency (MHz)	Index	RB# RBstart	Conducted Power (dBm)	
					QPSK	16QAM
Band 25	10 MHz	26090/1855	3	1#0	23.79	23.38
			0	4#0	24.00	24.37
		26365/1882.5	0	1#0	23.50	24.41
			0	4#0	23.66	23.47
		26640/1910	4	1#5	23.65	24.53
			7	4#2	23.85	23.55

Table 16. Module Original Conducted Powers from Module Report R2007A0435-R5

**Note:**

Highest conducted power listed in green. Channels with highest conducted power were selected for spot checking.

Mode	Freq. (MHz)	SG (dBm)	CL (dB)	AG (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
LTE Band 25 10 MHz BW QPSK	1855.0	-8.82	1.33	30.413	Vertical	20.26	33	12.73
LTE Band 25 10 MHz BW 16QAM	1910.0	-8.02	1.35	30.651	Vertical	21.28	33	11.71

Table 17. EIRP, Test Results, Part 24, LTE Band 25

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 2.1053 Radiated Spurious Emissions

**Test Requirement(s):** § 2.1053 Measurements required: Field strength of spurious radiation.

§ 2.1053 (a) Measurements shall be made to detect spurious emissions that may be radiated directly from the cabinet, control circuits, power leads, or intermediate circuit elements under normal conditions of installation and operation. Curves or equivalent data shall be supplied showing the magnitude of each harmonic and other spurious emission. For this test, single sideband, independent sideband, and controlled carrier transmitters shall be modulated under the conditions specified in paragraph (c) of § 2.1049, as appropriate. For equipment operating on frequencies below 890 MHz, an open field test is normally required with the measuring instrument antenna located in the far-field at all test frequencies. In the event it is either impractical or impossible to make open field measurements (e.g. a broadcast transmitter installed in a building) measurements will be accepted of the equipment as installed. Such measurements must be accompanied by a description of the site where the measurements were made showing the location of any possible source of reflections which might distort the field strength measurements. Information submitted shall include the relative radiated power of each spurious emission with reference to the rated power output of the transmitter, assuming all emissions are radiated from half-wave dipole antennas.

§ 2.1053 (b): The measurements specified in paragraph (a) of this section shall be made for the following equipment:

- (1) Those in which the spurious emissions are required to be 60 dB or more below the mean power of the transmitter.
- (2) All equipment operating on frequencies higher than 25 MHz.
- (3) All equipment where the antenna is an integral part of, and attached directly to the transmitter.
- (4) Other types of equipment as required, when deemed necessary by the Commission.

§ 22.917 **Emission limitations Cellular equipment:** The rules in this section govern the spectral characteristics of emissions in the Cellular Radiotelephone Service.

§ 22.917 (a): Out of band emissions. The power of any emission outside of the authorized operating frequency ranges must be attenuated below the transmitting power (P) by a factor of at least  $43 + 10 \log(P)$ . Limit is -13 dBm.

§ 24.238 (a): Out of band emissions. The power of any emission outside of the authorized operating frequency ranges must be attenuated below the transmitting power (P) by a factor of at least  $43 + 10 \log(P)$  dB. Limit is -13 dBm.

**Test Procedures:** The EUT was tested according to the average power integration procedures of ANSI C63.26 (2015) 5.5.3.

Radiated measurements shall be performed using the test arrangement shown in Figure. After a direct field strength measurement of the maximum emission amplitude level (maximized as described previously), a signal generator and transmit antenna are substituted in place of the EUT, as shown in Figure 7. The output power of the signal generator is adjusted to replicate the maximized signal amplitude measured in the direct field strength measurement. The signal generator power setting is then used to determine the ERP or EIRP of the EUT spurious emission(s). These measurements shall be performed in accordance with the common requirements specified in 5.5.2 and the specific requirements provided in this subclause.

A step-by-step procedure is as follows.

- k) Place the EUT in the center of the turntable. The EUT shall be configured to transmit into the standard non-radiating load (for measuring radiated spurious emissions), connected with cables of minimal length unless specified otherwise. If the EUT uses an adjustable antenna, the antenna shall be positioned to the length that produces the worst case emission at the fundamental operating frequency.
- l) Each emission under consideration shall be evaluated:
  - 6) Raise and lower the measurement antenna in accordance 5.5.2, as necessary to enable detection of the maximum emission amplitude relative to measurement antenna height.
  - 7) Rotate the EUT through 360° to determine the maximum emission level relative to the axial position.
  - 8) Return the turntable to the azimuth where the highest emission amplitude level was observed.
  - 9) Vary the measurement antenna height again through 1 m to 4 m again to find the height associated with the maximum emission amplitude.
  - 10) Record the measured emission amplitude level and frequency using the appropriate RBW.
- m) Repeat step b) for each emission frequency with the measurement antenna oriented in both the horizontal and vertical polarizations to determine the orientation that gives the maximum emissions amplitude.
- n) Set-up the substitution measurement with the reference point of the substitution a antenna located as near as possible to where the center of the EUT radiating element was located during the initial EUT measurement.



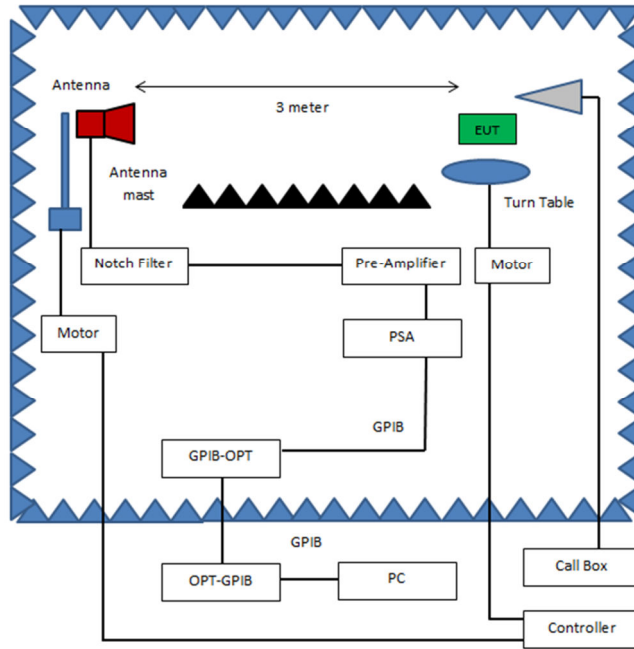


Figure 4. Radiated Spurious Emissions, Block Diagram, Test Setup

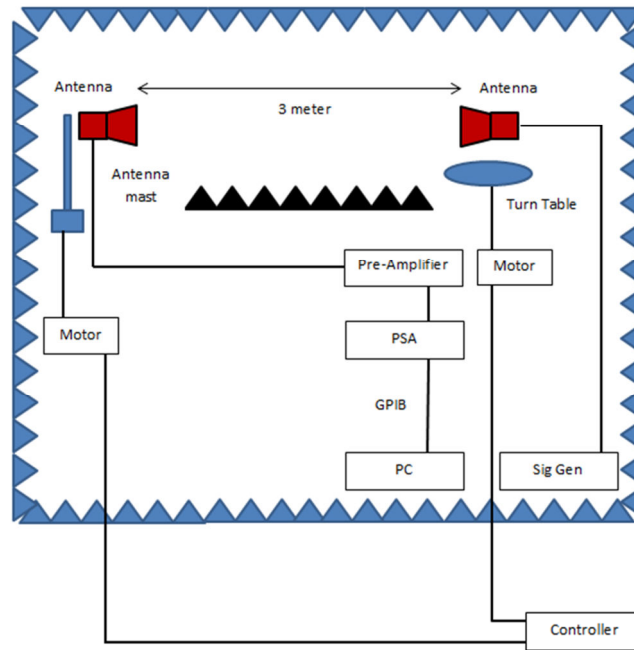


Figure 5. Radiated Spurious Emissions, Block Diagram, Test Setup

- o) Maintain the previous measurement instrument settings and test set-up, with the exception that the EUT is removed and replaced by the substitution antenna.
- p) Connect a signal generator to the substitution antenna; locate the signal generator so as to minimize any potential influences on the measurement results. Set the signal generator to the frequency where emissions are detected, and set an output power level such that the radiated signal can be detected by the measurement instrument, with sufficient dynamic range relative to the noise floor.
- q) For each emission that was detected and measured in the initial test [i.e., in step b) and step c)]:
  - 4) Vary the measurement antenna height between 1 m to 4 m to maximize the received (measured) signal amplitude.
  - 5) Adjust the signal generator output power level until the amplitude detected by the measurement instrument equals the amplitude level of the emission previously measured directly in step b) and step c).
  - 6) Record the output power level of the signal generator when equivalence is achieved in step 2).
- r) Repeat step e) through step g) with the measurement antenna oriented in the opposite polarization.
- s) Calculate the emission power in dBm referenced to a half-wave dipole using the following equation:

$$P_e = P_s(\text{dBm}) - \text{cable loss (dB)} + \text{antenna gain (dBd)}$$

where

$P_e$  = equivalent emission power in dBm

$P_s$  = source (signal generator) power in dBm

NOTE—dBd refers to the measured antenna gain in decibels relative to a half-wave dipole.

- t) Correct the antenna gain of the substitution antenna if necessary to reference the emission power to a half-wave dipole. When using measurement antennas with the gain specified in dBi, the equivalent dipole-referenced gain can be determined from:  $\text{gain (dBd)} = \text{gain (dBi)} - 2.15 \text{ dB}$ . If necessary, the antenna gain can be calculated from calibrated antenna factor information

**Test Results:** The EUT was found compliant with the requirements of this section.

Measurements were made in each configuration. Data is presented for the worse case configuration.

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

**Test Date(s):** 12/06/2020

**Radiated Spurious Emissions Test Results,**

GSM 850 – GPRS (GMSK)								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
2	1697.6	-90	1.25	29.78	Vertical	-63.62	-13	50.62
3	2546.4	-89	1.56	33.03	Vertical	-59.68	-13	46.68
4	3395.2	-87	1.82	33.14	Vertical	-57.83	-13	44.83
5	4244.0	-84	2.03	33.91	Vertical	-54.27	-13	41.27
6	5092.8	-83	2.34	34.56	Vertical	-52.93	-13	39.93
7	5941.6	-81	2.82	35.63	Vertical	-50.34	-13	37.34
8	6790.4	-79	2.91	35.98	Vertical	-48.08	-13	35.08
9	7639.2	-78	3.2	36	Vertical	-47.35	-13	34.35
10	8488.0	-78	3.57	36.11	Vertical	-47.61	-13	34.61

**Table 18. Radiated Spurious Emissions, Test Results, Part 22, GSM 850**

GSM 850 – EGPRS (8PSK)								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
2	1697.6	-92	1.25	29.78	Vertical	-65.62	-13	52.62
3	2546.4	-90	1.56	33.03	Vertical	-60.68	-13	47.68
4	3395.2	-89	1.82	33.14	Vertical	-59.83	-13	46.83
5	4244.0	-88	2.03	33.91	Vertical	-58.27	-13	45.27
6	5092.8	-86	2.34	34.56	Vertical	-55.93	-13	42.93
7	5941.6	-85	2.82	35.63	Vertical	-54.34	-13	41.34
8	6790.4	-83	2.91	35.98	Vertical	-52.08	-13	39.08
9	7639.2	-82	3.2	36	Vertical	-51.35	-13	38.35
10	8488.0	-80	3.57	36.11	Vertical	-49.61	-13	36.61

**Table 19. Radiated Spurious Emissions, Test Results, Part 22, GSM 850**

Note :

$EIRP = SG - CL + AG$   
 $ERP = EIRP - 2.15$

LTE Band 5 - QPSK								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
2	1688.0	-89	1.24	28.91	Vertical	-63.48	-13	50.48
3	2532.0	-88	1.54	32.40	Vertical	-59.29	-13	46.29
4	3346.0	-86	1.80	32.70	Vertical	-57.25	-13	44.25
5	4220.0	-84	2.03	32.24	Vertical	-55.94	-13	42.94
6	5064.0	-82	2.39	34.02	Vertical	-52.52	-13	39.52
7	5908.0	-81	2.67	34.94	Vertical	-50.88	-13	37.88
8	6752.0	-80	2.88	35.45	Vertical	-49.58	-13	36.58
9	7596.0	-79	3.22	35.66	Vertical	-48.71	-13	35.71
10	8440.0	-78	3.58	36.61	Vertical	-47.12	-13	34.12

Table 20. Radiated Spurious Emissions, Test Results, Part 22, LTE Band 5

LTE Band 5 - 16QAM								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	ERP Level (dBm)	Limit (dBm)	Margin
2	1658.0	-88	1.26	28.43	Vertical	-62.48	-13	49.48
3	2487.0	-87	1.56	32.05	Vertical	-58.29	-13	45.29
4	3316.0	-86	1.79	32.76	Vertical	-57.25	-13	44.25
5	4182.5	-85	1.99	33.27	Vertical	-56.94	-13	43.94
6	4974.0	-84	2.34	33.84	Vertical	-54.52	-13	41.52
7	5803.0	-83	2.59	34.80	Vertical	-52.88	-13	39.88
8	6632.0	-82	2.92	35.41	Vertical	-51.58	-13	38.58
9	7461.0	-81	3.17	35.69	Vertical	-50.71	-13	37.71
10	8290.0	-80	3.61	35.81	Vertical	-49.12	-13	36.12

Table 21. Radiated Spurious Emissions, Test Results, Part 22, LTE Band 5

Note :

$EIRP = SG - CL + AG$   
 $ERP = EIRP - 2.15$

GSM 1900 – GPRS (GMSK)								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3700.4	-87	1.89	33.61	Vertical	-55.28	-13	42.28
3	5550.6	-86	2.5	35.04	Vertical	-53.46	-13	40.46
4	7400.8	-85	3.29	35.89	Vertical	-52.4	-13	39.4
5	9251.0	-83	3.74	36.82	Vertical	-49.92	-13	36.92
6	11101.2	-81	3.9	38.54	Vertical	-46.36	-13	33.36
7	12951.4	-80	4.75	39.37	Vertical	-45.38	-13	32.38
8	14801.6	-79	4.52	40.08	Vertical	-43.44	-13	30.44
9	16651.8	-77	5	42.3	Vertical	-39.7	-13	26.7
10	18502.0	x	x	x	x	x	x	x

Table 22. Radiated Spurious Emissions, Test Results, Part 24, GSM 1900

GSM 1900 – EGPRS (8PSK)								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3700.4	-86	1.89	33.61	Vertical	-54.28	-13	41.28
3	5550.6	-85	2.5	35.04	Vertical	-52.46	-13	39.46
4	7400.8	-84	3.29	35.89	Vertical	-51.4	-13	38.4
5	9251.0	-82	3.74	36.82	Vertical	-48.92	-13	35.92
6	11101.2	-80	3.9	38.54	Vertical	-45.36	-13	32.36
7	12951.4	-79	4.75	39.37	Vertical	-44.38	-13	31.38
8	14801.6	-78	4.52	40.08	Vertical	-42.44	-13	29.44
9	16651.8	-75	5	42.3	Vertical	-37.7	-13	24.7
10	18502.0	x	x	x	x	x	x	x

Table 23. Radiated Spurious Emissions, Test Results, Part 24, GSM 1900

Note :

$EIRP = SG - CL + AG$   
 $ERP = EIRP - 2.15$

LTE Band 2 - QPSK								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3810.0	-90	1.89	33.56	Vertical	-58.33	-13	45.33
3	5715.0	-89	2.7	35.18	Vertical	-56.52	-13	43.52
4	7620.0	-88	3.26	35.98	Vertical	-55.28	-13	42.28
5	9525.0	-87	3.73	37.06	Vertical	-53.67	-13	40.67
6	11430.0	-85	4.1	38.83	Vertical	-50.27	-13	37.27
7	13335.0	-84	4.85	39.28	Vertical	-49.57	-13	36.57
8	15240.0	-82	4.42	40.26	Vertical	-46.16	-13	33.16
9	17145.0	-80	4.87	41.86	Vertical	-43.01	-13	30.01
10	19050.0	x	x	x	x	x	x	x

Table 24. Radiated Spurious Emissions, Test Results, Part 24, LTE Band 2

LTE Band 2 – 16QAM								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3810.0	-89	1.89	33.56	Vertical	-57.33	-13	44.33
3	5715.0	-87	2.7	35.18	Vertical	-54.52	-13	41.52
4	7620.0	-85	3.26	35.98	Vertical	-52.28	-13	39.28
5	9525.0	-83	3.73	37.06	Vertical	-49.67	-13	36.67
6	11430.0	-82	4.1	38.83	Vertical	-47.27	-13	34.27
7	13335.0	-81	4.85	39.28	Vertical	-46.57	-13	33.57
8	15240.0	-80	4.42	40.26	Vertical	-44.16	-13	31.16
9	17145.0	-78	4.87	41.86	Vertical	-41.01	-13	28.01
10	19050.0	x	x	x	x	x	x	x

Table 25. Radiated Spurious Emissions, Test Results, Part 24, LTE Band 2

Note :

$EIRP = SG - CL + AG$   
 $ERP = EIRP - 2.15$

LTE Band 25 - QPSK								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3710.0	-90	1.89	33.04	Vertical	-58.85	-13	45.85
3	5565.0	-89	2.57	34.43	Vertical	-57.14	-13	44.14
4	7420.0	-87	3.66	35.57	Vertical	-55.09	-13	42.09
5	9275.0	-85	3.82	36.47	Vertical	-52.35	-13	39.35
6	11130.0	-83	3.99	37.72	Vertical	-49.27	-13	36.27
7	12985.0	-81	4.62	39.04	Vertical	-46.58	-13	33.58
8	14840.0	-80	4.55	39.73	Vertical	-44.82	-13	31.82
9	16695.0	-79	4.90	41.70	Vertical	-42.2	-13	29.2
10	18550.0	x	x	x	x	x	x	x

Table 26. Radiated Spurious Emissions, Test Results, Part 24, LTE Band 25

LTE Band 25 – 16QAM								
Harmonic	Freq. (MHz)	SG (dBm)	Cable Loss (dB)	Gain (dBi)	Ant. Pol.	EIRP Level (dBm)	Limit (dBm)	Margin
2	3820.0	-89	1.87	33.06	Vertical	-57.85	-13	44.85
3	5730.0	-88	2.75	34.70	Vertical	-56.14	-13	43.14
4	7640.0	-87	3.20	35.66	Vertical	-55.09	-13	42.09
5	9550.0	-86	3.78	36.65	Vertical	-53.35	-13	40.35
6	11460.0	-85	3.85	37.87	Vertical	-51.27	-13	38.27
7	13370.0	-83	4.92	39.07	Vertical	-48.58	-13	35.58
8	15280.0	-81	4.40	40.25	Vertical	-45.82	-13	32.82
9	17190.0	-80	5.08	41.67	Vertical	-43.2	-13	30.2
10	19100.0	x	x	x	x	x	x	x

Table 27. Radiated Spurious Emissions, Test Results, Part 24, LTE Band 25

Note :

$$\text{EIRP} = \text{SG} - \text{CL} + \text{AG}$$

$$\text{ERP} = \text{EIRP} - 2.15$$

## 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 #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1S4075	RADIO COMMUNICATION TESTER	ROHDE & SCHWARZ	CMW500	09/20/2020	09/20/2022
1S2399	TURNTABLE/MAST CONTROLLER	SUNOL SCIENCES	SC99V	SEE NOTE 1	
1S2600	BILOG ANTENNA	TESEQ	CBL6112D	03/19/2019	03/19/2021
1S2733	BILOG ANTENNA	TESEQ	CBL6112D	06/05/2019	06/05/2021
1S3826	DRG HORN ANTENNA	ETS-LINDGREN	3117	12/03/2020	12/03/2022
1S2198	DRG HORN ANTENNA	ETS-LINDGREN	3117	10/07/2019	10/07/2021
1S2003	PXA Signal Analyzer	Keysight	N9030B	09/15/2020	09/15/2021
1S2587	PRE AMPLIFIER	AML COMMUNICATIONS	AML0126L3801	SEE NOTE 1	
1S2653	AMPLIFIER	SONOMA INSTRUMENT	310 N	SEE NOTE 1	
1S2486	5 METER CHAMBER	PANASHIELD - ETS	5M	SEE NOTE 2	
1S3824	SIGNAL GENERATOR	ROHDE & SCHWARZ	SMA100B	11/06/2019	05/06/2021

**Table 28. Test Equipment List**

Note 1: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

Note 2: Latest NSA and VSWR data available upon request.

**End of Report**