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Electromagnetic Emission Compliance Test Report



Equipment Under Test

(EUT)

Ground Penetrating Radar

Model Proceq GP8100

Applicant Proceq SA

In Accordance With FCC Part 15, Subpart F

Industry Canada RSS-220 (Issue 1/2009)

Tested by Advanced Compliance Laboratory, Inc.

210 Cougar Court

Hillsborough, New Jersey 08844

Authorized by Wei Li

Lab Manager

Signature

Date April 12, 2021

AC Lab Report Number 0048-210331-01-FCC-IC

NVLAP Lab Code:200101-0

The test result in this report is supported and covered by the NVLAP accreditation.

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EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Section 1. Summary of Test Results

Manufacturer: Proceq SA

Product Name: Ground Penetrating Radar

Model/Parts No.: PROCEQ GP8100

S/N: PT001

General: All measurements are traceable to national standards

These tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with FCC Part 15, Sub Part F and Industry Canada RSS-220 (Issue 1/2009).

New Submission	☐Production Unit

☐ Class I Permissive Change ☐ Pre-Production Unit

THIS TEST REPORT RELATES ONLY TO THE ITEM(S) TESTED.

THE FOLLOWING DEVIATIONS FROM, ADDITIONS TO, OR EXCLUSIONS FROM THE TEST SPECIFICATIONS HAVE BEEN MADE.

"See Summary of Test Data"



NVLAP LAB CODE: 200101-0

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EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Model: Proceq GP8100

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Summary of Test Data

Compliance Requirement	FCC & IC Rule Part	Test No. in Section 4	Result
Cross Reference	15.505 &RSS-GEN	1	Complies
Marketing of UWB Equipment	15.507 &RSS-GEN	2	Complies
Pulse Repetition Frequency(PRF)	15.509 &RSS-220 6.2	3	Complies
UWB Bandwidth	15.509(a) &RSS-220 6.2.1(a)	4	Complies
General Operational Requirements for LF Imaging System	15.509(b) &RSS-220 6	5	Complies
Spurious Radiated Emissions≤960MHz	15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d)	6	Complies
Spurious Radiated Emissions>960MHz	15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d)	7	Complies
Radiated Emissions in GPS Bands	15.509(e) 15.209 &RSS- 220 6.2(e)	8	Complies
Highest Radiated Emission at f _M	15.509(f) 15.209 &RSS- 220 6.2(g)	9	Complies
Technical Requirements Applicable to All UWB Devices	15.521	10	Complies
Coordination Requirement	15.525	11	N/A
Antenna Requirement	15.203& 15.204 &RSS-GEN 7.1.4	12	Complies
Radio Frequency Exposure	FCC OET Bulletin 65 &RSS-GEN	13	N/A
Conducted Emissions	15.507 &RSS-GEN	14	*
Transmission Duration	15.509(c) &15.519(a)(1)	15	Complies

^{*} NOT APPLICABLE to the EUT as it is a battery-powered device;

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The estimated uncertainty of the test result is given as following. The method of uncertainty calculation is provided in Advanced Compliance Lab. Doc. No. 0048-01-01.

	Prob. Dist.	Uncertainty(dB)	Uncertainty(dB)	Uncertainty(dB)
		30-1000MHz	1-6.5GHz	Conducted
Combined Std. Uncertainty u_c	norm.	±2.36	±2.99	±1.83

Date: April 12, 2021

Wei Li

Lab Manager

Advanced Compliance Lab

EUT: Ground Penetrating Radar Model: Proceq GP8100
FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Section 2. General Equipment & Test Configuration

2.1. EUT Specification

EUT	Ground Penetrating Radar, Model No.: PROCEQ GP8100 manufactured by Proceq SA. The Ground Penetrating Radar is an SFCW radar system intended to be used in non-destructive testing and geophysical surveying.		
Supply Voltage	8-15VDC provided by NiMH Battery or 5VDC provided by USB power bank		
Operating Frequency	Antenna: 1620.0 MHz to 4013.0 MHz		
-10dB UWB Bandwidth	2753 MHz		
Modulation Type	SFCW: Dwell Time=2us, Cycle Time=5ms Cycle Frequency 200Hz		
Peak Emissions in a 50 MHz Bandwidth	Max. peak emissions: <u>59.2dBuV/3MHz @3267MHz</u> 71.4dBuV/m /50MHz under 95.2dBuV/m limit (0dBm)		
Antenna	Seven Dipole Antennas		
Hardware Version	A0		
Software Version	4.6.3/2.0.1		

2.2. Description of Operation

The system performs time domain reflectometry by radiating a radio frequency CW with a cycle frequency of up to 200Hz from a transmitting dipole (TX dipole). Transitions between materials exhibiting different wave impedance through which the electromagnetic wave travels cause the wave to be reflected. These reflections are received by the receiving dipole (RX dipole) and sampled by the instrument. Results may

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be displayed in real time on the system screen and recorded on an internal solid state disk drive for later analysis. In the field, the system is powered from a removable rechargeable battery.

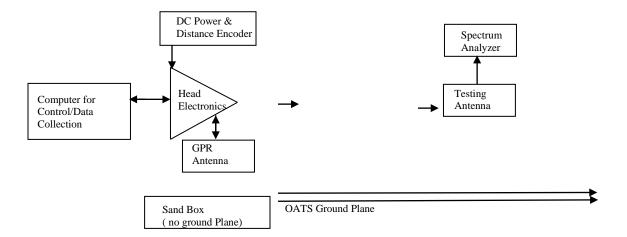
2.3. System Diagram

See Attachment provided by Applicant.

2.4. General EUT Setup

The EUT is operated in continuous transmission mode with the antennas permanently mounted in an all in one plastic housing with the controlling electronics and battery.

All measurements shall be made at room temperature and at nominal DC input voltage (provided by a battery). The EUT is placed directly on the dry sand with no ground plane under it.



2.5. Operational Frequency channel(s) for testing:

- CPU Clock: 400MHz
- Other Clocks: 24MHz, 40MHz, 100MHz
- RF antenna center frequencies for TX/RX modulations: 400MHz to 4000MHz

Model: Proceq GP8100

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Section 3. Test Methodology & Facilities

3.1 Measurement Procedure

The tests documented in this report were performed in accordance with ANSI C63.4 /C63.10, FCC CFR 47 Part 2 & 15, Industry Canada RSS-220 (Issue 1/2009) & FCC Order, ET Docket No. 980153(FCC02-08). Test procedure described in FCC "KDB 393764, UWB Compliance Measurements" is used in this report. The test methods used to generate the data is this test report is in accordance with ANSI C63.10:2013, American National Standard for Testing Unlicensed Wireless Devices.

In accordance with ANSI C63.10:2013, Section 10.2.2, the device under test was placed on a bed of dry sand and rotated through 16 azimuth angles (Clause 5.4) to determine which produced the highest emission relative to the limit. The azimuth that produced the highest emission relative to the limit was used for all radiated emission measurements.

3.2. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at Hillsborough, New Jersey, USA. The sites are constructed in conformance with the requirements of ANSI C63.4, ANSI C63.7 and CISPR Publication 32. All receiving equipment conforms to CISPR Publication 16-1, "Radio Interference Measuring Apparatus and Measurement Methods".

This site is accepted by FCC to perform measurements under Part 15 or 18 (Registration # 90601, MRA designation No. US5347) and also designated by IC as "site IC 3130A". ACL is accredited by NVLAP, Laboratory Code 200101-0. No part of this report may be used to claim or imply product endorsement by NVLAP or any agency of the US Government.

3.3. Test and Measurement Equipment

The following test and measurement equipment was utilized for the tests documented in this report:

Manufacture	Model	Serial No.	Description	Cal Due dd/mm/ yy
Hewlett-Packard	HP8546A	3448A00290	EMI Receiver	25/09/21
Agilent	E4440A	US40420700	3Hz-26.5GHz Spectrum Analyzer	17/06/21
EMCO	3104C	9307-4396	20-300MHz Biconical Antenna	15/01/22
EMCO	3146	9008-2860	200-1000MHz Log-Periodic Antenna	15/01/22
EMCO	3115	4945	Double Ridge Guide Horn Antenna	22/01/22

All Test Equipment Used is Calibrated, Traceable to NIST Standards. 2 Year Interval.

EUT: Ground Penetrating Radar Model: Proceq GP8100

Report Number: 0048-210331-01-FCC-IC FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Section 4. Measurement Data

Test No.1

Name of Test:	Cross Reference	Test Standard:	15.505 &RSS-GEN
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Minimum 15.505(a)

Standard: Equipment under test complies with all the relevant and

applicable requirements of Subpart A, Subpart B and Section 15.201 through 15.204 and Section 15.207 of Subpart C. 15.505(b)

The Digital circuitry portion of the EUT has been tested and verified to comply with 47 CFR Part 15, subpart B.

Measurement:

- **Method of** a) Except where specifically stated otherwise within this subpart, the provisions of Subparts A and B and of Sections 15.201 through 15.204 and Section 15.207 of Subpart C of this part apply to unlicensed UWB intentional radiators. The provisions of Sections 15.35(c) and 15.205 do not apply to devices operated under this subpart. The provisions of Footnote US 246 to the Table of Frequency Allocations contained in Section 2.106 of this chapter do not apply to devices operated under this subpart.
 - b) The requirements of Subpart F apply only to the radio transmitter, i.e., the intentional radiator, contained in the UWB device. Other aspects of the operation of a UWB device may be subject to requirements contained elsewhere in this chapter. In particular, a UWB device that contains digital circuitry not directly associated with the operation of the transmitter also is subject to the requirements for unintentional radiators in Subpart B of this chapter. Similarly, an associated receiver that operates (tunes) within the frequency range 30 MHz to 960 MHz is subject to the requirements in Subpart B of this chapter.

Test Result: Complies

Test Data: Data and Plots EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Project Number:	0048-210331-01-FCC-IC
EUT:	PROCEQ GP8100
S/N:	PT001
Tested By:	David Tu
Temperature:	65°F
Humidity:	30%

Model: Proceq GP8100 Report Number: 0048-210331-01-FCC-IC

Model: Proceq GP8100

Report Number: 0048-210331-01-FCC-IC

Spurious Radiated Emissions from Digital Circuitry (RF off) complies with FCC Part 15.109 (Class A), measured per ANSI C63.4 with standard setup.

Freq. (MHz)	H,V	Height (m)	Angle (degree)	SA* Reading (dBuV/m)	Refer to Part 15.109 3m Limit (dBuV/m)	Margin (dB)	Result
136.3	Η	1.8	045	46.2*	53.5	-7.3	Pass
141.4	Н	1.8	045	48.3*	53.5	-5.2	Pass
143.9	Н	1.8	045	48.0	53.5	-5.5	Pass
146.0	Н	1.8	135	47.2	53.5	-6.3	Pass
200	Н	1.1	135	48.7*	56.4	-7.7	Pass
280	Н	1.1	180	46.9*	56.4	-9.5	Pass
862	Н	1.1	180	32.6*	56.4	-23.8	Pass
902	Н	1.1	000	32.5*	56.4	-23.9	Pass
922	Н	1.1	000	34.9*	56.4	-21.5	Pass
1086	Н	1.1	180	35.6*	49.5	-13.9	Pass
1124	Н	1.1	180	36.2*	49.5	-13.3	Pass
1147	Н	1.1	180	35.8*	49.5	-13.7	Pass
1166	Н	1.1	180	35.5*	49.5	-14.0	Pass
136.3	V	1.1	090	48.4*	53.5	-5.1	Pass
141.4	V	1.1	090	48.3*	53.5	-5.2	Pass
143.9	V	1.1	090	46.5	53.5	-7.0	Pass
146.5	V	1.1	270	45.6	53.5	-7.9	Pass
200	V	1.1	135	47.9*	53.5	-5.6	Pass
800	V	1.1	135	31.1*	56.4	-25.3	Pass
904	V	1.1	270	32.3*	56.4	-24.1	Pass
924	V	1.1	270	31.9*	56.4	-24.5	Pass
944	V	1.1	270	32.7*	56.4	-23.7	Pass
1945	V	1.1	090	33.2*	49.5	-16.3	Pass
2525	V	1.1	090	35.4*	49.5	-14.1	Pass
2587	V	1.1	135	36.6*	49.5	-12.9	Pass
2667	V	1.1	135	32.4*	49.5	-17.1	Pass
2686	V	1.1	090	35.9*	49.5	-13.6	Pass

^{*}Quasi-peak reading. For emissions that have peak values close to (or over) the specification limit (if any) will be also measured in the quasi-peak or average mode to determine the compliance.

EUT: Ground Penetrating Radar Model: Proceq GP8100

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Test No.2

Name of Test: Marketing of UWB Equipment		Test Standard:	15.507 &RSS-GEN
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Minimum 15.507/ 2.909

The responsible party is properly informed about the responsible for Standard:

ensuring that the equipment is marketed only to eligible parties, and

provide correct information on the customers and users. (See Important note for the US customers of the

Installation Guide and User Manual)

Measurement:

Method of In some cases, the operation of UWB devices is limited to specific parties, e.g., law enforcement, fire and rescue organizations operating under the auspices of a state or local government. The marketing of UWB devices must be directed solely to parties eligible to operate the equipment. The responsible party, as defined in Section 2.909 of this chapter, is responsible for ensuring that the equipment is marketed only to eligible parties. Marketing of the equipment in any other manner may be considered grounds for revocation of the grant of certification issued for the equipment.

Test Result: Complies

Test Data: NA

Report Number: 0048-210331-01-FCC-IC

Test No.3

Name of Test:	Pulse Repetition Frequency (PRF)	Test Standard:	15.509(d) &RSS-220 6.2
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Minimum Definition:

Standard: Pulse Repetition Frequency (PRF) is the trigger repetition frequency.

Cycle Frequency: 200Hz

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 30KHz VBW: ≥RBW Detector: Peak Span: As required Sweep: Auto

Test Result: Complies

Test Data: Cycle Frequency= 200Hz EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.4

Name of Test:	UWB Bandwidth	Test Standard:	15.509(a) 15.503(a) &RSS-220 6.2.1(a)
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Minimum Standard:

Definition:

The bandwidth of a UWB emission is defined by the points on the emission spectrum where the amplitude is 10 dB below the maximum emission amplitude (i.e., the -10 dB points), as based on the complete transmission system including the antenna. The upper boundary is designated f_H and the lower boundary is designated f_L . The frequency at which the highest radiated emission occurs is designated f_M . The center frequency f_C , equals $(f_H + f_L)$ /2. The fractional bandwidth equals $2 * (f_H - f_L) / (f_H + f_L)$.

In cases where the measured emission spectrum contains multiple (more than two) -10 dB points, the outermost points define the bandwidth (i.e., the widest bandwidth is assumed).

Limits:

The UWB bandwidth of an imaging system operating under the provisions of this section must be below 10.6 GHz.

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 1MHz VBW: 3MHz Detector: Peak

Span: As required (to display a full spectrum of the RF emission)

Sweep: Auto

Test Procedure:

- 1) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 2) Measure the Highest radiated emission at f_M as described in the test No. 9.
- 3) Recorded the upper and lower frequency that are at the side of the band bounded by the points at 10 dB below the highest radiated UWB emission level. Measuring the bandwidth of a UWB device using a radiated test set-up, it is imperative that appropriate adjustments be made to the measured amplitude levels to account for the frequency-dependent components of the measurement system (e.g., antenna gain or factor, pre-amplifier gain, cable loss, etc). Since UWB emissions can have bandwidths several GHz wide, these frequency-dependent characteristics can vary dramatically over the fundamental emission. According to the nature of the broadband emission characteristics, significant care must be taken to capture the true spectrum of emission, extremely narrow sweep widths is recommended.
- 4) The UWB bandwidth is the different of the upper and lower frequency recorded.

Test Result: Complies

Test Data: Data and Plots

Report Number: 0048-210331-01-FCC-IC

Measurement Data (Values in MHz):

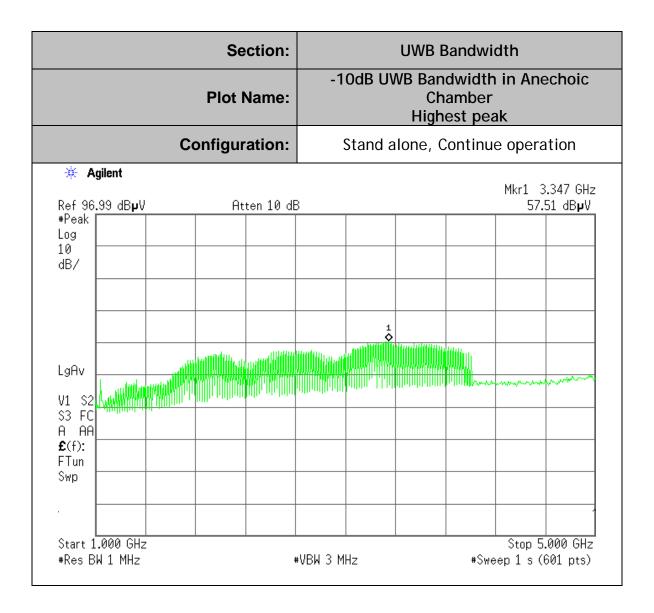
fм	The highest emission peak	3347
f∟	10 dB below the highest peak	1620
fн	10 dB above the highest peak	4013
fc	Calculated: (f _H + f _L)/2	2816.5
Bandwidth	Calculated: (fн - f∟)	2393
Fractional BW	Calculated: 2*(f _H - f _L)/(f _H + f _L)	0.85

Note: The Fraction Bandwidth is greater than 0.2.

Measurement Plots:

Project Number:	0048-210331-01-FCC-IC	
EUT:	PROCEQ GP8100	
S/N:	PT001	
Tested By:	Wei Li	
Temperature:	65°F	
Humidity:	30%	

Model: Proceq GP8100



Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

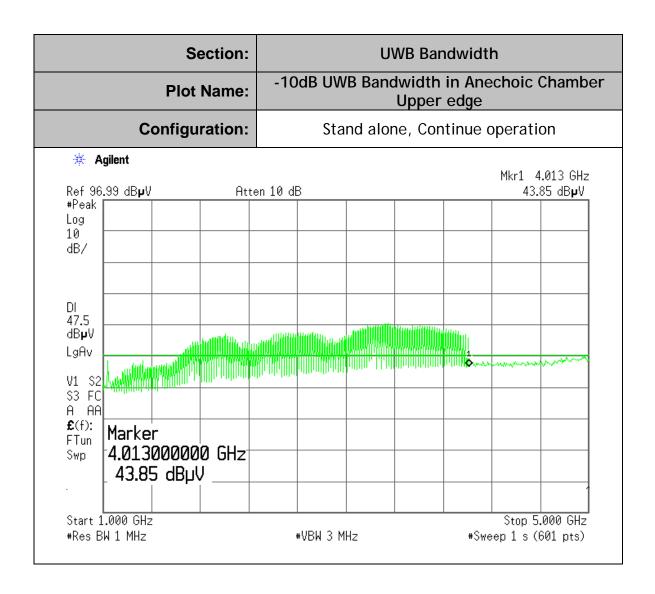
S/N: PT001

Tested By: Wei Li

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100



Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

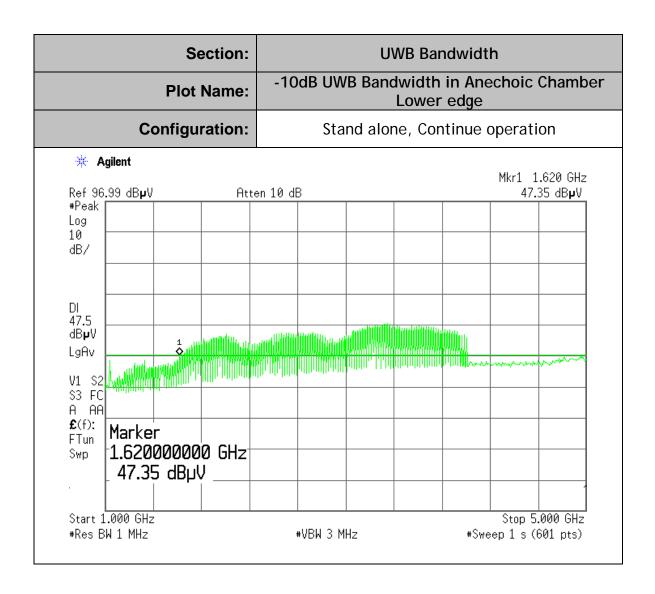
S/N: PT001

Tested By: Wei Li

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100



Report Number: 0048-210331-01-FCC-IC

Test No.5

Name of Test:	General Operational Requirements for LFIS	Test Standard:	15.509(b) &RSS-220 6	
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021	

Minimum 15.509(b) &RSS-220 6

Standard: Operation under the provisions of this section is limited to GPRs and

imaging systems operated for the purposes with law enforcement, fire fighting, emergency rescue, scientific research,

commercial mining, or construction.

Method of The manufacturer Shall state that the device under test complies with

Measurement: the requirements outlined in section FCC Part 15.509 (b).

Complies Test Result:

Test Data: NA

Report Number: 0048-210331-01-FCC-IC

Test No.6

Name of Test:	Spurious Radiated Emissions ≤960MHz		
Tested By:	David Tu	Test Date:	03/31/2021-04/12/2021

Minimum Definition:

Standard: The radiated emissions at or below 960 MHz from a device operating under

the provisions of this section shall not exceed the emission levels in Section

15.209.

Limits:

Frequency	Field Strengths Limits	Measuring RBW	Distance
(MHz)	(dBµV/m)	kHz	(meters)
0.009-0.490	67,6-20*Logf(kHz)	1	300
0.490-1.705	87,6-20*Logf(kHz)	9	30
1.705-30	29,5	9	30
30-88	40,0	120	3
88-216	43,5	120	3
216-960	46,0	120	3

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 120KHz VBW: ≥3x RBW Detector: Quasi-Peak Span: As required Sweep: Auto

Test Procedure:

T--4 D----14-

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to peak with a bandwidth of 120 kHz during monitoring the frequency range below 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded. At each of the frequencies were a field strength was recorded the final measurement was performed with a Quasi-Peak detector.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 was repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

C----1'--

Test Result:	Compiles	
Test Deter	Data	
Test Data:	Data	

Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

S/N: PT001

Tested By: David Tu

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100

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Worst Case Scenario: the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

• EUT Position (angle) : 45 ° interval.

• Antenna Polarization: Horizontal & Vertical; Antenna Height: 1-4m

Freq.* (MHz)	H,V	SA QP Reading (dBuV/ m)	Height (m)	Angle (degree)	Refer to Part 15.209 3m Limit (dBuV/m)	Margin (dB)	Result
133.7	Н	36.4	1.6	180	43.5	-7.1	Pass
136.3	Н	37.9	1.6	180	43.5	-5.6	Pass
138.8	Н	37.6	1.6	180	43.5	-5.9	Pass
141.4	Н	34.2	1.6	180	43.5	-9.3	Pass
146.0	Н	39.0	1.1	180	43.5	-4.5	Pass
200	Н	30.6	1.0	235	43.5	-12.9	Pass
214	Н	33.0	1.0	235	43.5	-10.5	Pass
308	Н	39.8	1.0	235	46.0	-6.2	Pass
390	Н	35.8*	1.0	180	46.0	-10.2	Pass
720	Н	31.6	1.0	180	46.0	-14.4	Pass
800	Н	23.3	1.0	180	46.0	-22.7	Pass
123.9	V	30.1	1.1	090	43.5	-13.4	Pass
129.0	V	30.8	1.1	090	43.5	-12.7	Pass
138.8	V	32.7	1.1	135	43.5	-10.8	Pass
142.6	V	33.6	1.1	135	43.5	-9.9	Pass
146.0	V	37.3	1.1	135	43.5	-6.2	Pass
150.7	V	33.5	1.1	135	43.5	-10.0	Pass
200	V	30.4	1.1	090	43.5	-13.1	Pass
280	V	30.6	1.1	090	46.0	-15.4	Pass
386	V	35.1	1.1	090	46.0	-10.9	Pass
720	V	32.8	1.1	090	46.0	-13.2	Pass

Model: Proceq GP8100

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

820	V	32.9	1.1	135	46.0	-13.1	Pass
936	V	35.0	1.1	135	46.0	-11.0	Pass

^{*}Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15 B) shall be excluded.

Model: Proceq GP8100

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.7

Name of Test:	Spurious Radiated Emissions >960MHz	Test Standard:	15.509(d) 15.209 &RSS- 220 3.4, 6.2(c), 6.2(d)	
Tested By:	David Tu	Test Date:	03/31/2021-04/12/2021	

Minimum Definition:

Standard: The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz.

Limits:

Frequency	EIRP @ 3 meters (1 MHz BW)	Field strength @ 3 meters (1 MHz BW)	Field strength @ 1 meters (1 MHz BW)
(MHz)	(dBm)	(dBµV/m)	(dBµV/m)
960-1610	-	29,9	39,4
1610-1990	-	41,9	51,4
1990-3100	-	43,9	53,4
3100-10600	-	53,9	63,4
Above 10600	-	43,9	53,9

Remark: The limits were converted from EIRP to field strength at 3 and 1 meter according to FCC 15.503(k).

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 1MHz VBW: ≥3x RBW

Detector: RMS Average Detector

Span: As required Sweep: Auto

Test Procedure:

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna is placed at 1 meter away from the EUT and it is pointed in the direction of the radiating head with an inclination of -10° to find the highest emission.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to RMS with a bandwidth of 1 MHz during monitoring the frequency range above 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 were repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

Test Result:	Complies
Test Data:	Data

 Project Number:
 0048-210331-01-FCC-IC

 EUT:
 PROCEQ GP8100

 S/N:
 PT001

 Tested By:
 David Tu

 Temperature:
 65°F

Model: Proceq GP8100

30%

Report Number: 0048-210331-01-FCC-IC

Worst Case Scenario: the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

• EUT Position (angle) : 45 ° interval.

Humidity:

• Antenna Polarization: Horizontal & Vertical; Antenna Height: 1m-4m.

Freq.* (MHz)	H,V	SA Average Reading @1m (dBuV/m)	Height (m)	Angle (degree)	Refer to 15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d) Limit (dBuV/m)	Margin (dB)	Result
1224	Н	32.8	1.0	180	39.4	-6.6	Pass
1320	Н	32.0	1.0	180	39.4	-7.4	Pass
1460	Н	32.3	1.0	225	39.4	-7.1	Pass
1484	Н	32.1	1.0	180	39.4	-7.3	Pass
1580	Н	31.9	1.0	225	39.4	-7.5	Pass
1940	Н	43.9	1.0	225	51.4	-7.5	Pass
2130	Н	45.4	1.0	225	53.4	-8.0	Pass
2160	Н	45.8	1.0	225	53.4	-7.6	Pass
1320	V	33.6	1.0	090	39.4	-5.8	Pass
1723	V	30.4	1.0	090	39.4	-9.0	Pass
1761	V	30.6	1.0	090	39.4	-8.8	Pass
1884	V	31.0	1.0	090	39.4	-8.4	Pass
2340	V	43.7	1.0	135	53.4	-9.7	Pass
2464	V	44.9	1.0	135	53.4	-8.5	Pass
2564	V	43.3	1.0	090	53.4	-10.1	Pass
2730	V	44.0	1.0	135	53.4	-9.4	Pass

^{*}Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15 B) shall be excluded.

Report Number: 0048-210331-01-FCC-IC

Test No.8

Name of Test:	Radiated Emissions in GPS Bands	Test Standard:	15.509(e) 15.209 &RSS- 220 6.2(e)
Tested By:	David Tu	Test Date:	03/31/2021-04/12/2021

Minimum Standard:

Definition:

In addition to the radiated emission limits specified for frequency above 960 MHz, UWB transmitters operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of no less than 1 kHz in the GPS frequency bands.

Limits:

Frequency (MHz)	EIRP @ 3 meters (1 MHz BW) (dBm)	Field strength @ 3 meters (1 MHz BW) (dBµV/m)	Field strength @ 1 meters (1 MHz BW) (dBµV/m)
1164-1240	-75.3	19.9	29.4
1559-1610	-75.3	19.9	29.4

Remark: The limits were converted from EIRP to field strength at 3 and 1 meter according to FCC 15.503(k).

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 1KHz VBW: >3xRBW

Detector: RMS Average Detector

Span: As required Sweep: Auto

Test Procedure:

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna is placed at 1 meter away from the EUT and it is pointed in the direction of the radiating head with an inclination of -10° to find the highest emission.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to RMS during monitoring the frequency range above 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 were repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

Complies

Test Data:	Data and Plot

Test Result:

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Model: Proceq GP8100 Report Number: 0048-210331-01-FCC-IC

Project Number:	0048-210331-01-FCC-IC	
EUT:	PROCEQ GP8100	
S/N:	PT001	
Tested By:	David Tu	
Temperature:	65°F	
Humidity:	30%	

Worst Case Scenario: All maximum Field strength emissions were found at the following test set-up conditions:

Freq. (MHz)	H,V	SA Reading (dBuV/m)	Height (m)	Angle (degree)	1m Limit (dBuV/m)	Margin (dB)	Result
1199.97	Н	10.29	1.5	180	29.4	-19.11	Pass
1183.63	Н	2.58	1.5	180	29.4	-26.82	Pass
1191.99	Н	1.86	1.5	225	29.4	-27.54	Pass
1203.65	Н	5.05	1.5	180	29.4	-24.35	Pass
1562.83	Н	3.03	1.5	180	29.4	-26.37	Pass
1582.89	Н	4.67	1.5	225	29.4	-24.73	Pass
1602.10	Н	2.52	1.5	225	29.4	-26.88	Pass
1602.86	Н	4.45	1.5	225	29.4	-24.95	Pass
1199.97	V	2.61	1.5	090	29.4	-26.79	Pass
1184.27	V	3.66	1.5	090	29.4	-25.74	Pass
1191.99	V	1.63	1.5	135	29.4	-27.77	Pass
1203.65	V	2.93	1.5	135	29.4	-26.47	Pass
1563.59	V	0.32	1.5	135	29.4	-29.08	Pass
1582.29	V	0.07	1.5	090	29.4	-29.33	Pass
1583.57	V	1.65	1.5	090	29.4	-27.75	Pass
1602.10	V	1.73	1.5	090	29.4	-27.67	Pass

^{*} Measured signals were narrowband and related to the microprocessor / clocks and do not fall under the requirements of this section.

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

S/N: PT001

Tested By: Wei Li

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100

_	_	S	ection:		Radia	ated En	nission	s in Gl	PS Band	ds
		Plot	Name:	Radiated Emissions in 116 H Polarit						
	C	onfigu	ration:		Stan	d alone	, Conti	nue op	eration	า
Ref 72 #Avg Log	dBµV		#Atten	0 dB				Mkr4		65 GHz 6 dB µ V
10 dB/					1					
DI 29.4 dB µ V PAvg		~~	2	ĻŽ	À.	*				*
	L.164 0 BW 1 kH			Ŷ	В W 3 kl	Hz	Swee	-	1.240 7 s (60	00 GHz 1 pts)
Mark 1 2 3 4		race (1) (1) (1) (1)	Type Freq Freq Freq Freq		1.199 1.183 1.191	(Axis 97 GHz 63 GHz 99 GHz 65 GHz		-	Amplit 10.29 d 2.58 d 1.86 d 5.05 d	ude BµV BµV BµV

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

S/N: PT001

Tested By: Wei Li

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100

	Section:	Radia	ted Emissions in GPS Ba	nds
Р	lot Name:	Radiated Emissions in 1164-1240MHz Band V Polarity		
Conf	iguration:	Stand	alone, Continue operati	on
* Agilent				203 65 GHz
Ref 72 dBµV	#Atten	0 dB		2.93 dB µ V
*Avg Marker				
1.20365000	0 GHz			
dB/ 2.93 dBµV				
5.33 aph				
DI 29.4		3 1 4		
dBpV		<u> </u>		
PAvg				
11109				
V1 S2				1
Start 1.164 00 GHz			Stop 1.2	40 00 GHz
#Res BW 1 kHz		VBW 3 kHz	Sweep 229.7 s	(601 pts)
	ype	X Axis	Amplitude	
		.99 97 GHz .84 27 GHz	2.61 dBµV 3.66 dBµV	
3 (1) F	req 1.1	.91 99 GHz	1.63 dBµV	
4 (1) F	req 1.2	03 65 GHz	2.93 dBµV	

Project Number: 0048-210331-01-FCC-IC

EUT: PROCEQ GP8100

S/N: PT001

Tested By: Wei Li

Temperature: 65°F

Humidity: 30%

Model: Proceq GP8100

	Section:		n:	Radiated Emissions in GPS Bands			
		Plot Name	Radi	ated Emiss	sions in 155 H Polarity		z Band
	Con	figuration	n:	Stand ald	ne, Continu	e operatior	1
₩ A	gilent					Mkr3 1.602	095 GHz
Ref 72	dB µ V	#Att	en 0 dB				52 dB µ V
#Avg Log 10 dB/	Marker 1.60209500 2.52 dBµ						
·	2.32 dbp	V					
DI 29.4 dB µ V PAvg	1		···	2	**************************************	34	,
V1 S2							
	.559 000 GHz ₩ 1 kHz		VBk	√3 kHz	Swe	Stop 1.610 ep 154.1 s (6	
Mark 1 2 3 4	er Trace (1) (1) (1)	Freq :	X Axis 1.562 825 G 1.582 885 G 1.602 095 G 1.602 860 G	Hz Hz Hz	Amplitude 3.03 dBµV 4.67 dBµV 2.52 dBµV 4.45 dBµV		,

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Project Number:	0048-210331-01-FCC-IC
EUT:	PROCEQ GP8100
S/N:	PT001
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%

Model: Proceq GP8100 Report Number: 0048-210331-01-FCC-IC

	Section:	Radiated En	nissions in GPS Bands		
Plot Name:			Radiated Emissions in 1559-1610MHz Band V Polarity		
Conf	iguration:	Stand alone	, Continue operation		
	#Atten	0 dB	Mkr4 1.602 095 GHz 1.73 dB µ V		
Marker 1.602095000 dB/ 1.73 dBµV					
DI 29.4 dB µ V PAvg	~_~~	2 3	4 ***		
V1 S2 Start 1.559 000 GHz #Res BW 1 kHz		VBW 3 kHz	Stop 1.610 000 GHz Sweep 154.1 s (601 pts)		
	eq 1.5 eq 1.5 eq 1.5	X Axis 63 590 GHz 82 290 GHz 83 565 GHz 02 095 GHz	Amplitude 0.32 dBμV 0.07 dBμV 1.65 dBμV 1.73 dBμV		

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.9

Name of Test:	Highest Radiated Emission at f	Test Standard:	15.509(f) 15.209 &RSS-220 6.2(g)
Tested By:	David Tu	Test Date:	03/31/2021-04/12/2021

Minimum Standard:

Minimum Definition:

For UWB devices where the frequency at which the highest radiated emission occurs, f_M , is above 960 MHz, there is a limit on the peak level of the emissions contained within a 50 MHz bandwidth centered on f_M .

Limits:

The peak emission level contained within a 50 MHz bandwidth cantered on f_M mast be limited to a maximum of 0 dBm EIRP.

EIRP limit (dBm)	Field strength limit @ 3 meters for 50MHz RBW (dBuV/m) (dBµV/m)	Field strength limit @ 3 meters (measured with 3 MHz RBW) (dBµV/m)
0	95.2	70.8

The limits were converted from EIRP to field strength at 3 meter according to FCC 15.503(k).

As the measurement was employed with a 3 MHz resolution bandwidth the applicable limit is adjusted with a 20log(1/50) dB factor.

 $20 \log (3/50) dBm = -24.4 dBm$. -24.4 dBm = 70.8 dBuV/m.

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Method of Tested at 3-meter OATS per ANSI C63.4

Measurement: Spectrum Analyzer Settings:

RBW: 3MHz VBW: ≥3x RBW Detector: Peak Span: As required Sweep: Auto

Test Procedure:

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position).
- 2) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to peak with a bandwidth of 3 MHz during monitoring the frequency range inside the UWB of the EUT.
- 5) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 6) The receiving antenna was positioned in vertical polarization and the steps 4 to 6 were repeated.
- 7) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 8) Record the peak emission from the EUT.

Test Result:	Complies

Test Data:

Project Number:	0048-210331-01-FCC-IC	
EUT:	PROCEQ GP8100	
S/N:	PT001	
Tested By:	David Tu	
Temperature:	65°F	
Humidity:	30%	

Model: Proceq GP8100

Report Number: 0048-210331-01-FCC-IC

Worst Case Scenario: The maximum peak level of emission is found at the following test set-up conditions:

Freq. (MHz)	H,V	SA Peak Reading At 1 meter (dBuV/m)	RBW	Reading corrected for 3 meter	Limit (dBuV/m)	Margin (dB)	Result
3267*	V		3MHz	59.2	70.8	-11.6	Pass

^{*} measured at 3m per signal level

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100

Model: Proceq GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.10

Name of Test:	Technical Requirements Applicable to ALL UWB Devices	Test Standard:	15.521
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Requirement Description

15.521(a)	The EUT is not employed for the operation of toys, operation onboard an aircraft, ship and satellite.
15.521(b)	Permanent attached antenna, no External radio frequency power amplifiers and antenna modifications are permitted.
15.521(c)	The Digital circuitry portion of the EUT has been tested and verified to comply with 47 CFR Part 15, subpart B.
15.521(d)	Considered
15.521(e)	The f_M , frequency at which the highest radiated emission occurs is contained within the measured UWB bandwidth.
15.521(f)	The EUT is not intended to detection of tags or the transfer or data or voice information.
15.521(g)	Considered
15.521(h)	Considered
15.521(i)	Prohibition in Sections 2.201(f) and 15.5(d) of this chapter against Class B (damped wave) emissions is not applied.
15.521(j)	Battery operating device not connected to AC power lines.
15.521(a)	The EUT is not employed for the operation of toys, operation onboard an aircraft, ship and satellite.

Test Result:	Complies	
Test Data:	NA	

EUT: Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.11

Name of Test:	Coordination Requirement	Test Standard:	15.525
Tested By:	Wei Li	Test Date:	03/31/2021-04/12/2021

Minimum The responsible party is properly informed about the required Standard: coordination requirement and provide correct information to the customers and users about their specific care and legislative obligations.

> (See Important note for the US customers of the Installation Guide and User Manual)

Measurement:

- Method of (a) UWB imaging systems require coordination through the FCC before the equipment may be used. The operator shall comply with any constraints on equipment usage resulting from this coordination.
 - (b) The users of UWB imaging devices shall supply operational areas to the FCC Office of Engineering and Technology, which shall coordinate this information with the Federal Government through the National Telecommunications and Information Administration.
 - (c) The manufacturers, or their authorized sales agents, must inform purchasers and users of their systems of the requirement to undertake detailed coordination of operational areas with the FCC prior to the equipment being operated.
 - (d) Users of authorized, coordinated UWB systems may transfer them to other qualified users and to different locations upon coordination of change of ownership or location to the FCC and coordination with existing authorized operations.
 - (e) The FCC/NTIA coordination report shall identify those geographical areas within which the operation of an imaging system requires additional coordination or within which the operation of an imaging system is prohibited.

	(f) The coordination of routine UWB operations shall not take longer than 15 business days from the receipt of the coordination request by NTIA.
Test Result:	
Test Data:	NA

Report Number: 0048-210331-01-FCC-IC

Test No. 12

Name of Test:	Antenna Requirement	Test Standard:	15.203&15.204 &RSS- GEN 7.1.4
Tested By:	WEI LI	Test Date:	

Minimum An intentional radiator shall be designed to ensure that no antenna **Standard:** 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.

Method of The antenna utilized by the device under test is an internal, non user Measurement: replaceable unit.

Test Result: Complied with using an internal, non user replaceable Antenna

Test Data: NA

Report Number: 0048-210331-01-FCC-IC

Test No.13

Name of Test:	Radio Frequency Exposure	Test Standard:	FCC OET Bulletin 65 &RSS-GEN
Tested By:	WEI LI	Test Date:	03/31/2021-04/12/2021

Minimum Public Exposure to Radio Frequency Energy Levels (1.1307 (b)(1))

Standard: Limits:

> From §1.1310 Table 1 (B), for Public $S = 1.0 \text{ mW/cm}^2$

for Professional, $S = 5.0 \text{ mW/cm}^2$

 $\begin{array}{l} d = 0.282 * 10 \land ((P+G) \ / \ 20) \ / \ \sqrt{S} \\ S = 0.0795 * 10 \land ((P+G)/10) / \ d^2 \end{array}$ Equation (1) Method of Equation (2) **Measurement:** where

> d = MPE distance in cm P = Power in dBm

> > G = Antenna Gain in dBi

S = Power Density Limit in mW/cm^2

Equation (1) and the measured peak power is used to calculate the MPE distance.

Equation (2) and the measured peak power is used to calculate the Power density.

Test Result:

Test Data: NA

Report Number: 0048-210331-01-FCC-IC

Calculation:

For this EUT, max emission level is under the limit set in Section 15.209. No RF hazard need to be concerned.

Reference CFR 1.1310, Table 1: Limits for Maximum Permissible Exposure (MPE), Section (B): Limits for General Population/Uncontrolled Exposure

Report Number: 0048-210331-01-FCC-IC

Test No.14

Name of Test:	Conducted Emissions	Test Standard:	15.507 &RSS-GEN
Tested By:	-	Test Date:	-

Minimum 15.507 &RSS-GEN

Standard:

Limit

Frequency Range	Limits (dBµV)		
(MHz)	Quasi-Peak	Average	
0.15 to 0.50	66 to 56*	56 to 46*	
0.50 to 5.0	56	46	
5.0 to 30.0	60	50	
* Decreases with the logarithm of the frequency.			

Method of Test measurements were made in accordance with ANSI C63.4-2003, Measurement: Standard Methods of Measurement of Radio Noise Emissions from Low-Voltage Electrical and Electronics Equipment in the Range of 9 kHz to 40 GHz.

Spectrum Analyzer Setting:

Frequency Range: 150KHz to 30MHz

RBW: 9KHz VBW: 30KHz

Detector: Peak/QP/Average

Test Result:	NA
	(The FUT is only powered via a lithium ion bettery which is remotely recharged

(The EUT is only powered via a lithium-ion battery which is remotely recharged)

Test Data: NA **EUT:** Ground Penetrating Radar Model: Proceq GP8100

FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test No.15

Name of Test:	Transmission Duration	Test Standard:	15.509(c)& 15.519(a)(1)
Tested By:	-	Test Date:	-

Minimum 15.509 (c)

Standard: A GPR that is designed to be operated while being hand held and a wall imaging system shall contain a manually operated switch that causes the transmitter to cease operation within 10 seconds of being released by the operator. In lieu of a switch located on the imaging system, it is permissible to operate an imaging system by remote control provided the imaging system ceases transmission within 10 seconds of the remote switch being released by the operator.

15.519(a)(1)---for hand held UWB Systems

A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.

Method of Functional Check **Measurement:**

Model: Proceq GP8100

EUT: Ground Penetrating Radar FCC ID: 2ANPE-GP8100 IC:24043-GP8100 Report Number: 0048-210331-01-FCC-IC

Test Result: Complies

De-activation takes place within 10 seconds of the control system being switched off/not active or released by the operator or an acknowledgment of reception was received by the UWB intentional **Test Data:**

radiator within 10 seconds. Procedure is documented in operational

description manual.

Project Number:	0048-210331-01				
EUT:	Proceq GP8100				
S/N:	PT001				
Tested By:	Wei Li				
Temperature:	65°F				
Humidity:	30%				

Model: Proceq GP8100 Report Number: 0048-210331-01-FCC-IC

Section:					Transmission Duration							
Plot Name:				7	Transmission Duration with Kill Switch							
Configuration:					3	Stand alone, Kill Switch Manual Release						
MARKER A ACTV DET: PEAK -8.9874 sec MEAS DET: PEAK QP -23.14 dB MKRA -8.9874 sec -23.14 dB												
LOG 6 dB/ #ATN 10 dB		0.0 dE	BµV∕m			l			PREA	MP ON		
VA SB SC FC ACORR							maren	an and the	agrant and references	na de de como		
CENTE	R 2.78	32500 W 1.0	MHz	#AVG			Cil		P 20.0			
the op		n take	s piace	e within	1U S	econd	or the	contro	oi syst	em being r	reieasea by	y