

# Wireless test report – 366722-1TRFWL

Applicant:

# Thales Canada, Transportation Solutions

Product type:

# ComTrac CBTC Radio

Model:Model variant:3CU10385ABAA3CU10385AAAAFCC ID:IC Registration number:2AO3U3CU1038523653-3CU10385

Specifications:

# FCC 47 CFR Part 15 Subpart C, §15.247

Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz

# RSS-247, Issue 2, Feb 2017, Section 5

Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices 5) Standard specifications for frequency hopping systems and digital transmission systems operating in the bands 902–928 MHz, 2400–2483.5 MHz and 5725–5850 MHz

Date of issue: June 9, 2020

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Nemko Canada Inc., a testing laboratory, is accredited by the Standards Council of Canada. The tests included in this report are within the scope of this accreditation

FCC 15.247 and RSS-247.docx; Date: Apr 2019



www.nemko.com



#### Test location(s)

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#### Limits of responsibility

Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contain in this report are within Nemko Canada's ISO/IEC 17025 accreditation.

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# Section 1. Report summary

### 1.1 Applicant

Company name	Thales Canada, Transportation Solutions
Address	105 Moatfield Drive, Toronto, ON, Canada, M3B 0A4

### 1.2 Manufacturer

Company name	Jabil Circuit (Shanghai) Ltd.
Address	600 Tian Lin Road, Shanghai, China, 200233

### 1.3 Test specifications

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

### 1.4 Test methods

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

### 1.5 Statement of compliance

In the configuration tested, the EUT was found compliant.

Testing was performed against all relevant requirements of the test standard except as noted in section 1.6 below. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See "Summary of test results" for full details.

### 1.6 Exclusions

None

### 1.7 Test report revision history

Revision #	Date of issue	Details of changes made to test report	
TRF	June 9, 2020	Original report issued	

# Section 2. Summary of test results

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

Table 2.1-1: FCC general requirements results

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

Notes: EUT is a DC powered device.

### 2.2 FCC Part 15 Subpart C, intentional radiators test results for frequency hopping spread spectrum systems

Part	Test description	Verdict
§15.247(a)(1)(i)	Requirements for operation in the 902–928 MHz band	Not applicable
§15.247(a)(1)(ii)	Requirements for operation in the 5725–5850 MHz band	Not applicable
§15.247(a)(1)(iii)	Requirements for operation in the 2400–2483.5 MHz band	Pass
§15.247(b)(1)	Maximum peak output power in the 2400–2483.5 MHz band and 5725–5850 MHz band	Pass
§15.247(b)(2)	Maximum peak output power in the 902–928 MHz band	Not applicable
§15.247(c)(1)	Fixed point-to-point operation with directional antenna gains greater than 6 dBi	Not applicable
§15.247(c)(2)	Transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams	Not applicable
§15.247(d)	Spurious emissions	Pass
§15.247(f)	Time of occupancy for hybrid systems	Not applicable

#### Table 2.2-1: FCC 15.247 results for FHSS

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

Table		DCC Com	
rapie	2.3-1:	RSS-Gen	results

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

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

EUT is a DC powered device.

### 2.4 ISED RSS-247, Issue 2, test results for frequency hopping spread spectrum systems (FHSS)

#### Table 2.4-1: RSS-247 results for FHSS

Part	Test description	Verdict
5.1	Frequency Hopping Systems (FHSs)	
5.1 (a)	Bandwidth of a frequency hopping channel	Pass
5.1 (b)	Minimum channel spacing	Pass
5.1 (c)	Systems operating in the 902–928 MHz band	Not applicable
5.1 (d)	Systems operating in the 2400–2483.5 MHz band	Pass
5.1 (e)	Systems operating in the 5725–5850 MHz band	Not applicable
5.3	Hybrid Systems	
5.3 (a)	Digital modulation turned off	Not applicable
5.3 (b)	Frequency hopping turned off	Not applicable
5.4	Transmitter output power and e.i.r.p. requirements	
5.4 (a)	Systems operating in the 902–928 MHz band	Not applicable
5.4 (b)	Systems operating in the 2400–2483.5 MHz band	Pass
5.4 (c)	Systems operating in the 5725–5850 MHz	Not applicable
5.4 (e)	Point-to-point systems in 2400–2483.5 MHz and 5725–5850 MHz band	Not applicable
5.4 (f)	Transmitters which operate in the 2400–2483.5 MHz band with multiple directional beams	Not applicable
5.5	Unwanted emissions	Pass

Notes: None

# Section 3. Equipment under test (EUT) details

### 3.1 Sample information

Receipt date	January 9, 2018
Nemko sample ID number	1

### 3.2 EUT information

Product type	ComTrac CBTC Radio
Model	3CU10385ABAA
Serial number	P924901

### 3.3 Technical information

Applicant IC company number	23653	
IC UPN number	23653-3CU10385	
All used IC test site(s) Reg. number	24676	
RSS number and Issue number	RSS-247 Issue 2, Feb 2017	
Frequency band	2400–2483.5 MHz	
Frequency Min (MHz)	2402	
Frequency Max (MHz)	2480	
RF power Max (W), Conducted	0.091 (19.6 dBm)	
Field strength, dBμV/m @ 3 m	N/A	
Measured BW (kHz), 99% OBW	901 kHz	
Type of modulation	2GFSK	
Emission classification (F1D, G1D, D1D)	854KF1D (Emission Designator)	
Transmitter spurious, dBμV/m @ 3 m	73.8 dBµV/m Peak and 53.8 dBµV/m Average at 2483.5 MHz @ 3 m	
Power requirements	12 V <sub>DC</sub> nominal (9-14 V <sub>DC</sub> , < 2.5 A)	
Antenna information	Andrew Flat Planar Array Microceptor Antenna, QD-2402, 16 dBi	
	The EUT is professionally installed.	

### 3.4 Product description and theory of operation

The ComTrac Radio is used as a telecommunication device within the context of Communications- Based Train Control (CBTC) System. The radio incorporates the IEEE 802.11 FHSS standard to provide radio-to-radio communication using the unlicensed 2.4GHz spectrum in a mobile environment. It also provides fiber and LAN connectivity to pass data traffic from wayside to on-board networks.

It can work at two operational modes, Access Point and Mobile Radio:

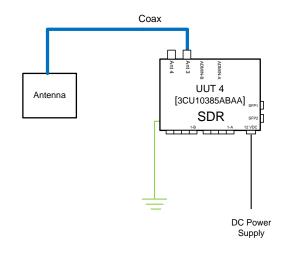
Access Point: An access point (AP) is a mode of operation that allows connectivity, through bridging, from a wired local area network (LAN) to one or more clients.

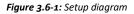
Mobile Radio (client or station): Client is an operational mode which provides wireless communication from the AP to its wired LAN(s), and is responsible to initiate roaming between AP's.

### 3.5 EUT exercise details

The EUT was setup in continuous transmit state and operated as an Access Point.

### 3.6 EUT setup diagram





# Section 4. Engineering considerations

### 4.1 Modifications incorporated in the EUT

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

### 4.2 Technical judgment

EUT model is 3CU10385ABAA and variant model is 3CU10385AAAA. The only bill of material deviation between 3CU10385AAAA and 3CU10385ABAA is the radio cover, removal of two RF connectors on the front panel. 3CU10385AAAA utilizes a pin fin heatsink and 4 n-type connectors on the front plate. 3CU10385ABAA utilizes a low profile heatsink and 2 n-type connectors on the front plate. The RF board, Digital Processing Board and PSU are identical.

### 4.3 Deviations from laboratory tests procedures

No deviations were made from laboratory procedures.

# Section 5. Test conditions

### 5.1 Atmospheric conditions

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

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

### 5.2 Power supply range

The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages ±5 %, for which the equipment was designed.

# Section 6. Measurement uncertainty

### 6.1 Uncertainty of measurement

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

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

Table 6.1-1	: Measurement	uncertainty

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

# Section 7. Test equipment

### 7.1 Test equipment list

Table 7.1-1: Equipment list					
Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
3 m EMI test chamber	ТДК	SAC-3	FA003012	1 year	Oct. 10/20
Flush mount turntable	SUNAR	FM2022	FA003006	_	NCR
Controller	SUNAR	SC110V	FA002976	—	NCR
Antenna mast	SUNAR	TLT2	FA003007	_	NCR
Receiver/spectrum analyzer	Rohde & Schwarz	ESR26	FA002969	1 year	June 04/20
Bilog antenna (30–2000 MHz)	SUNAR	JB1	FA003010	1 year	Sept. 17/20
Horn antenna (1–18 GHz)	ETS-Lindgren	3117	FA002911	1 year	Sept. 11/20
Preamp (1–18 GHz)	ETS-Lindgren	124334	FA002956	1 year	Sept. 26/20
Horn antenna (18-25 GHz)	ETS-Lindgren	3116B	FA002948	1 year	July 09/20
50 Ω coax cable	Huber + Suhner	None	FA003047	1 year	Sept 30/20
50 Ω coax cable	Huber + Suhner	None	FA003044	1 year	Oct. 7/20
Spectrum analyzer	Rohde & Schwarz	FSW43	FA002971	1 year	June 21/20
Filter 2.4 – 2.4835 GHz	Microwave Circuits	N0324413	FA003027	1 year	Oct. 08/20

Note: NCR - no calibration required



### Section 8. Testing data

### 8.1 FCC 15.31(e) Variation of power source

#### 8.1.1 Definitions and limits

For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage. For battery operated equipment, the equipment tests shall be performed using a new battery.

#### 8.1.2 Test date

Start date	January 3, 2020

#### 8.1.3 Observations, settings and special notes

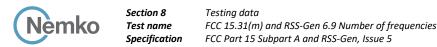
The testing was performed as per ANSI C63.10 Section 5.13.

- a) Where the device is intended to be powered from an external power adapter, the voltage variations shall be applied to the input of the adapter provided with the device at the time of sale. If the device is not marketed or sold with a specific adapter, then a typical power adapter shall be used.
- b) For devices where operating at a supply voltage deviating ±15% from the nominal rated value may cause damages or loss of intended function, test to minimum and maximum allowable voltage per manufacturer's specification and document in the report.
- c) For devices with wide range of rated supply voltage, test at 15% below the lowest and 15% above the highest declared nominal rated supply voltage.
- d) For devices obtaining power from an input/output (I/O) port (USB, firewire, etc.), a test jig is necessary to apply voltage variation to the device from a support power supply, while maintaining the functionalities of the device.

For battery-operated equipment, the equipment tests shall be performed using a variable power supply.

### 8.1.4 Test data

EUT Power requirements:	$\Box$ AC	🛛 DC	□ Battery
If EUT is an AC or a DC powered, was the noticeable output power variation observed?	🛛 YES	□ NO	🗆 N/A
If EUT is battery operated, was the testing performed using fresh batteries?	□ YES	□ NO	🗆 N/A
If EUT is rechargeable battery operated, was the testing performed using fully charged batteries?	□ YES	$\Box$ NO	🗆 N/A



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

#### 8.2.1 Definitions and limits

#### FCC:

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

#### ISED:

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

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

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

8.2.2 Test da	te
Start date	January 3, 2020

#### 8.2.3 Observations, settings and special notes

Per ANSI C63.10 Subclause 5.6.2.1:

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

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

Per ANSI C63.10 Subclause 5.6.2.2:

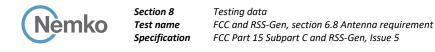
For devices with multiple operating modes, measurements on the middle channel can be used to determine the worst-case mode(s). The worst-case modes are as follows:

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

#### 8.2.4 Test data

Table 8.2-2: Test channels selection					
Start of Frequency range, MHz	End of Frequency range, MHz	Frequency range bandwidth, MHz	Low channel, MHz	Mid channel, MHz	High channel, MHz
2400	2483.5	83.5	2402	2438	2480

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

#### 8.3.1 Definitions and limits

#### FCC:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with §15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

#### ISED:

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

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

8.3.2	Test dat	e				
Start date	9	January 3, 2020				-
8.3.3	Observa	tions, settings and special notes				
None						
8.3.4	Test dat	a				
	UT have de	essionally installed? tachable antenna(s)? le, is the antenna connector(s) non-standard?	⊠ YES ⊠ YES □ YES	□ NO □ NO ⊠ NO	□ N/A	



### 8.4 FCC 15.247(a)(1) and RSS-247 5.1 Frequency Hopping Systems requirements, 2 GHz operation

#### 8.4.1 Definitions and limits

FCC:

- (1) Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400–2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.
- (iii) Frequency hopping systems in the 2400–2483.5 MHz band shall use at least 15 channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed. Frequency hopping systems may avoid or suppress transmissions on a particular hopping frequency provided that a minimum of 15 channels are used.
- (f) For the purposes of this section, hybrid systems are those that employ a combination of both frequency hopping and digital modulation techniques. The frequency hopping operation of the hybrid system, with the direct sequence or digital modulation operation turned-off, shall have an average time of occupancy on any frequency not to exceed 0.4 seconds within a time period in seconds equal to the number of hopping frequencies employed multiplied by 0.4. The power spectral density conducted from the intentional radiator to the antenna due to the digital modulation operation of the hybrid system, with the frequency hopping operation turned off, shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

#### ISED:

- a) The bandwidth of a frequency hopping channel is the 20 dB emission bandwidth, measured with the hopping stopped. The system's radio frequency (RF) bandwidth is equal to the channel bandwidth multiplied by the number of channels in the hopset. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.
- b) FHSs shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, FHSs operating in the band 2400–2483.5 MHz may have hopping channel carrier frequencies that are separated by 25 kHz or two thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided that the systems operate with an output power no greater than 0.125 W.
- d) FHSs operating in the band 2400–2483.5 MHz shall use at least 15 hopping channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds, multiplied by the number of hopping channels employed. Transmissions on particular hopping frequencies may be avoided or suppressed provided that at least 15 hopping channels are used.



Testing data FCC 15.247(a)(1) and RSS-247 5.1 Frequency Hopping Systems requirements FCC Part 15 Subpart C and RSS-247, Issue 2

#### 8.4.2 Test date

art date J	anuary 3, 2020

#### 8.4.3 Observations, settings and special notes

Carrier frequency separation was tested per ANSI C63.10 subclause 7.8.2. Spectrum analyser settings:

Resolution bandwidth	Start with the RBW set to approximately 30% of the channel spacing; adjust as necessary to best identify the center of each individual channel.
Video bandwidth	≥ RBW
Frequency span	Wide enough to capture the peaks of two adjacent channels
Detector mode	Peak
Trace mode	Max Hold

Number of hopping frequencies was tested per ANSI C63.10 subclause 7.8.3. Spectrum analyser settings:

Resolution bandwidth	To identify clearly the individual channels, set the RBW to less than 30% of the channel spacing or the 20 dB bandwidth, whichever is smaller.
Video bandwidth	≥ RBW
Frequency span	The frequency band of operation. Depending on the number of channels the device supports, it may be necessary to divide the frequency range of operation across multiple spans, to allow the individual channels to be clearly seen.
Detector mode	Peak
Trace mode	Max Hold

Time of occupancy (dwell time) was tested per ANSI C63.10 subclause 7.8.4. Spectrum analyser settings:

Resolution bandwidth	shall be $\leq$ channel spacing and where possible RBW should be set >> 1 / T, where T is the expected dwell time per channel.
Video bandwidth	≥ RBW
Frequency span	Zero span, centered on a hopping channel.
Detector mode	Peak
Trace mode	Max Hold

20 dB bandwidth was tested per ANSI C63.10 subclause 6.9.2. Spectrum analyser settings:

Resolution bandwidth	$\ge$ 1–5% of the 20 dB bandwidth
Video bandwidth	≥ RBW
Frequency span	approximately 2 to 5 times the 20 dB bandwidth, centered on a hopping channel
Detector mode	Peak
Trace mode	Max Hold

8.4.4 Test data

#### Table 8.4-1: 20 dB bandwidth results

Frequency, MHz	20 dB bandwidth, kHz
2402	956
2438	956
2480	956

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 Section 8 Test name Specification Testing data FCC 15.247(a)(1) and RSS-247 5.1 Frequency Hopping Systems requirements FCC Part 15 Subpart C and RSS-247, Issue 2

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

Frequency, MHz	99% occupied bandwidth, kHz	
2402	901	
2438	901	
2480	900	

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

#### Table 8.4-3: Carrier frequency separation results

Carrier frequency separation, kHz	Minimum limit, kHz	Margin, kHz
1022	956	66
Network The 20 dB beneficialty was utilized as		

Notes: The 20 dB bandwidth was utilized as the minimum limit as it was greater than 25 kHz. 0

Table 8.4-4: Number of hopping frequencies results

Number of hopping frequencies	Minimum limit	Margin
79	15	64

Table 8.4-5: Average time of occupancy results					
Dwell time of each pulse, ms Number of pulses within period Total dwell time within period, ms Limit, ms Margin,					
0.856	5	4.280	400.000	395.720	







20:02:05 03.01.2020

Figure 8.4-1: 20 dB bandwidth on low channel

Figure 8.4-2: 20 dB bandwidth on mid channel



Testing data FCC 15.247(a)(1) and RSS-247 5.1 Frequency Hopping Systems requirements FCC Part 15 Subpart C and RSS-247, Issue 2



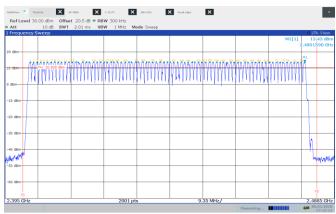


Figure 8.4-3: 20 dB bandwidth on high channel

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Figure 8.4-4: Number of hopping channels, 79

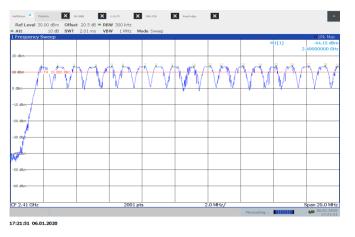
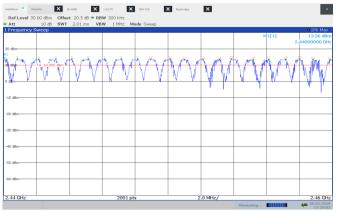
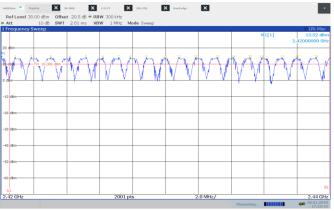


Figure 8.4-5: Number of hopping channels, 2.4 to 2.42 GHz = 19

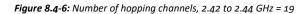


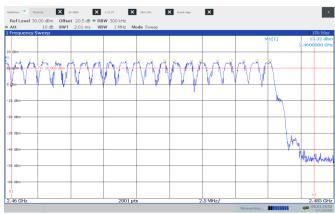
17:29:02 06.01.2020

Figure 8.4-7: Number of hopping channels, 2.44 to 2.46 GHz = 21



17:25:43 06.01.2020



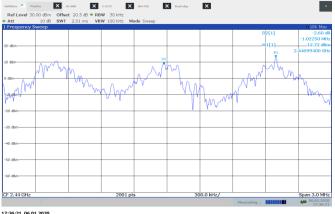


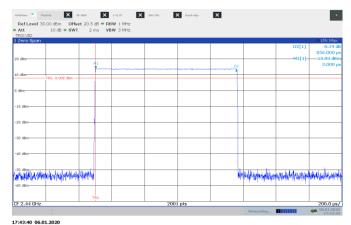
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Figure 8.4-8: Number of hopping channels, 2.46 to 2.485 GHz = 20



Testing data FCC 15.247(a)(1) and RSS-247 5.1 Frequency Hopping Systems requirements FCC Part 15 Subpart C and RSS-247, Issue 2





17:36:21 06.01.2020

Figure 8.4-9: Carrier frequency separation = 1 MHz

Figure 8.4-10: Average time of occupancy pulse = 0.856 ms

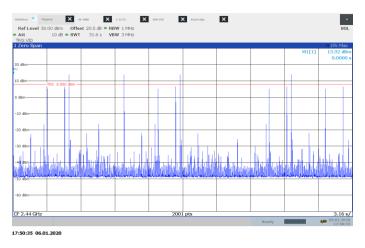
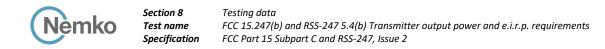


Figure 8.4-11: Time of occupancy over 31.6 seconds (Worst case) = 4.28 ms (5 pulses x 0.856 ms (Dwell time))



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

#### 8.5.1 Definitions and limits

#### FCC:

(b) The maximum peak conducted output power of the intentional radiator shall not exceed the following:

- (1) For frequency hopping systems operating in the 2400–2483.5 MHz band employing at least 75 non-overlapping hopping channels, and all frequency hopping systems in the 5725–5850 MHz band: 1 watt (30 dBm). For all other frequency hopping systems in the 2400–2483.5 MHz band: 0.125 watts (21 dBm).
- (4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

#### ISED:

For FHSs operating in the band 2400–2483.5 MHz, the maximum peak conducted output power shall not exceed 1.0 W (30 dBm) if the hopset uses 75 or more hopping channels; the maximum peak conducted output power shall not exceed 0.125 W (21 dBm) if the hopset uses less than 75 hopping channels. The e.i.r.p. shall not exceed 4 W (36 dBm), except as provided in section 5.4(e).

#### Section 5.4(e)

Fixed point-to-point systems in the bands 2400–2483.5 MHz and 5725–5850 MHz are permitted to have an e.i.r.p. higher than 4 W provided that the higher e.i.r.p. is achieved by employing higher gain directional antennas and not higher transmitter output powers. Point-to-multipoint systems, omnidirectional applications and multiple co-located transmitters transmitting the same information are prohibited from exceeding an e.i.r.p. of 4 W.

8.5.2	Test dat	e			
Start dat	e	January 3, 2020			

#### 8.5.3 Observations, settings and special notes

Conducted output power was tested per ANSI C63.10 subclause 7.8.5. The hopping shall be disabled for this test. Spectrum analyser settings:

Resolution bandwidth	> 20 dB bandwidth of the emission being measured
Video bandwidth	≥ RBW
Frequency span	approximately 5 times the 20 dB bandwidth, centered on a hopping channel
Detector mode	Peak
Trace mode	Max Hold

#### 8.5.4 Test data

#### Table 8.5-1: Output power and EIRP results

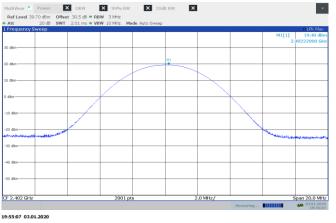
Frequency, MHz	Output power, dBm	Output power limit*, dBm	Margin, dB	Antenna gain, dBi	EIRP, dBm	EIRP limit, dBm	EIRP margin, dB
2402	19.4	20.0	0.6	16.0	35.4	36.0	0.6
2438	19.6	20.0	0.4	16.0	35.6	36.0	0.4
2478	19.5	20.0	0.5	16.0	35.5	36.0	0.5
2479	18.2	20.0	1.8	16.0	34.2	36.0	1.8
2480	15.5	20.0	4.5	16.0	31.5	36.0	4.5

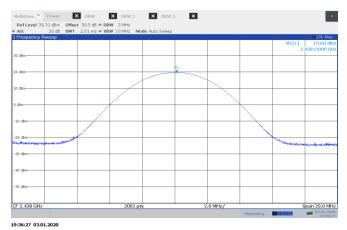
EIRP = Output power + Antenna gain

\* Output power limit was reduced by 10 dB as antenna gain is 10 dB higher than 6 dBi.



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





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Figure 8.5-1: Output power on low channel

Figure 8.5-2: Output power on mid channel

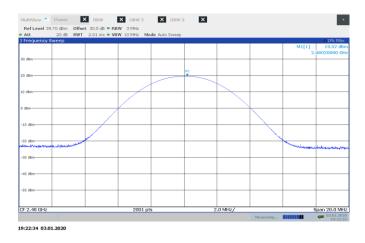
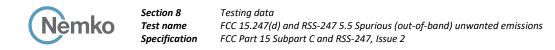


Figure 8.5-3: Output power on high channel



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

#### 8.6.1 Definitions and limits

#### FCC:

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

#### ISED:

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 5.4(d), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

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

Frequency,	Field stren	gth of emissions	Measurement distance,
MHz	μV/m	dBµV/m	m
0.009-0.490	2400/F	67.6 – 20 × log10(F)	300
0.490-1.705	24000/F	87.6 – 20 × log10(F)	30
1.705-30.0	30	29.5	30
30–88	100	40.0	3
88–216	150	43.5	3
216–960	200	46.0	3
above 960	500	54.0	3

Notes: In the emission table above, the tighter limit applies at the band edges.

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test



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

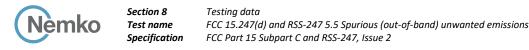
#### Table 8.6-2: ISED restricted frequency bands

MHz	MHz	MHz	GHz
0.090-0.110	12.57675-12.57725	399.9–410	7.25–7.75
0.495-0.505	13.36–13.41	608–614	8.025-8.5
2.1735-2.1905	16.42–16.423	960–1427	9.0–9.2
3.020-3.026	16.69475-16.69525	1435–1626.5	9.3–9.5
4.125-4.128	16.80425-16.80475	1645.5-1646.5	10.6–12.7
4.17725-4.17775	25.5-25.67	1660–1710	13.25–13.4
4.20725-4.20775	37.5–38.25	1718.8–1722.2	14.47–14.5
5.677-5.683	73–74.6	2200-2300	15.35–16.2
6.215-6.218	74.8–75.2	2310–2390	17.7–21.4
6.26775-6.26825	108–138	2483.5-2500	22.01-23.12
6.31175–6.31225	149.9–150.05	2655–2900	23.6–24.0
8.291-8.294	156.52475-156.52525	3260-3267	31.2–31.8
8.362-8.366	156.7–156.9	3332–3339	36.43–36.5
8.37625-8.38675	162.0125-167.17	3345.8-3358	
8.41425-8.41475	167.72–173.2	3500-4400	Above 28 C
12.29–12.293	240–285	4500–5150	Above 38.6
12.51975-12.52025	322–335.4	5350–5460	

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

#### Table 8.6-3: FCC restricted frequency bands

MHz	MHz	MHz	GHz
0.090-0.110	16.42–16.423	399.9–410	4.5–5.15
0.495-0.505	16.69475-16.69525	608–614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960–1240	7.25–7.75
4.125-4.128	25.5-25.67	1300–1427	8.025-8.5
4.17725-4.17775	37.5–38.25	1435–1626.5	9.0–9.2
4.20725-4.20775	73–74.6	1645.5-1646.5	9.3–9.5
6.215-6.218	74.8–75.2	1660–1710	10.6–12.7
6.26775-6.26825	108-121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225	123–138	2200–2300	14.47–14.5
8.291-8.294	149.9–150.05	2310-2390	15.35–16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7–21.4
8.37625-8.38675	156.7-156.9	2690–2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260–3267	23.6–24.0
12.29-12.293	167.72-173.2	3332–3339	31.2-31.8
12.51975-12.52025	240–285	3345.8–3358	36.43–36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36–13.41			



#### 8.6.2 Test date

Start date	December 31, 2019

#### 8.6.3 Observations, settings and special notes

The spectrum was searched from 30 MHz to the  $10^{\mbox{th}}$  harmonic.

EUT was set to transmit with 100 % duty cycle for single channel.

Radiated measurements were performed at a distance of 3 m from 30 MHz to 18 GHz. Radiated measurements above 18 GHz were performed at a distance of 1 m.

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

FHSS emissions in restricted frequency bands test was performed as per KDB 558074, section 9 b) with reference to ANSI C63.10 subclause 6.10.5.

As per the client's request, radiated spurious emissions test at the upper band edge was performed at three highest channels, with output power setting 16 dBm at Tx-2480 MHz channel and 20 dBm at Tx-2479 MHz channel and Tx-2478 MHz channel.

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

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

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

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

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

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

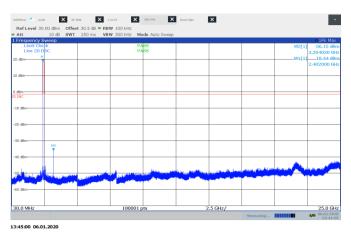
Spectrum analyser settings for conducted spurious emissions measurements:

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



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

### 8.6.4 Test data



 Normal Name
 Normal Name

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Figure 8.6-1: Conducted spurious emissions, Tx-2402 MHz

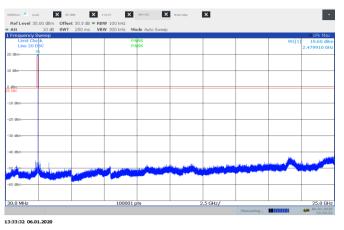


Figure 8.6-3: Conducted spurious emissions, Tx-2480 MHz

Figure 8.6-2: Conducted spurious emissions, Tx-2438 MHz

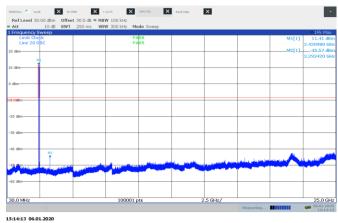
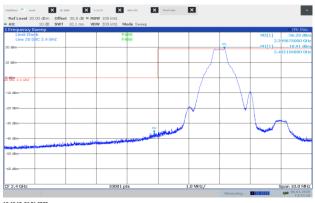


Figure 8.6-4: Conducted spurious emissions, Tx-hopping



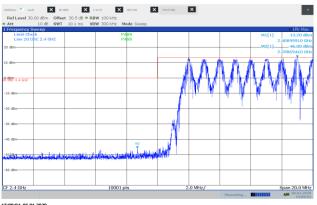
Testing data FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions FCC Part 15 Subpart C and RSS-247, Issue 2

#### 8.6.4 Test data, continued



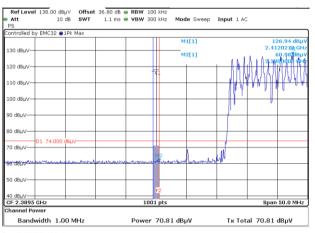
13:43:19 06.01.2020

Figure 8.6-5: Conducted spurious emissions at the lower band edge, Tx-2402 MHz



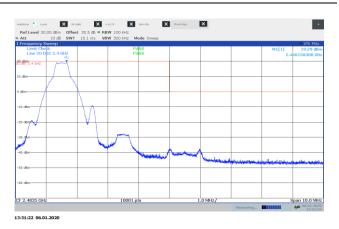
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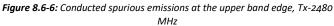
Figure 8.6-7: Conducted spurious emissions at the lower band edge, Hopping

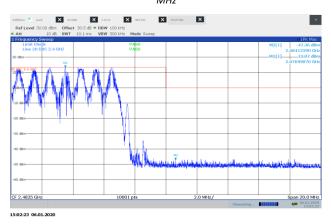


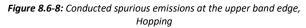
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Figure 8.6-9: Radiated spurious emissions at the lower band edge, Hopping









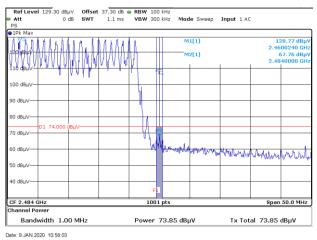


Figure 8.6-10: Radiated spurious emissions at the upper band edge, Hopping



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

#### 8.6.4 Test data, continued

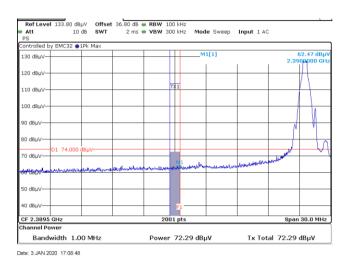
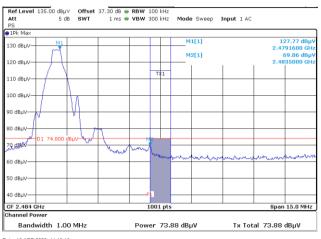
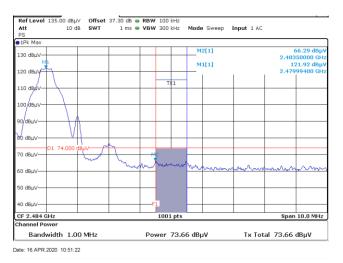


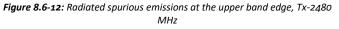
Figure 8.6-11: Radiated spurious emissions at the lower band edge, Tx-2402 MHz

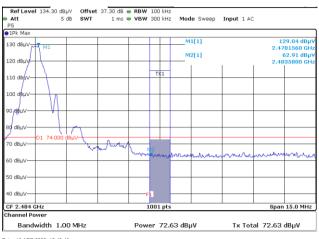


Date: 16.APR.2020 11:19:16

Figure 8.6-13: Radiated spurious emissions at the upper band edge, Tx-2479 MHz

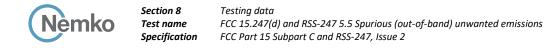






Date: 16.APR.2020 15:43:46

Figure 8.6-14: Radiated spurious emissions at the upper band edge, Tx-2478 MHz



#### 8.6.4 Test data, continued

#### Duty cycle/average factor calculations

\$15.35(c) When the radiated emission limits are expressed in terms of the average value of the emission, and pulsed operation is employed; the measurement field strength shall be determined by averaging over one complete pulse train, including blanking intervals, as long as the pulse train does not exceed 0.1 seconds.

Duty cycle or average factor =  $20 \times \log_{10} \left( \frac{T x_{100_{ms}}}{100_{ms}} \right)$ 

Measured pulse witdth = 0.86 ms

Duty cycle or average factor =  $20 \times \log_{10} \left( \frac{0.86_{ms}}{100_{ms}} \right)$  = -41.3 dB

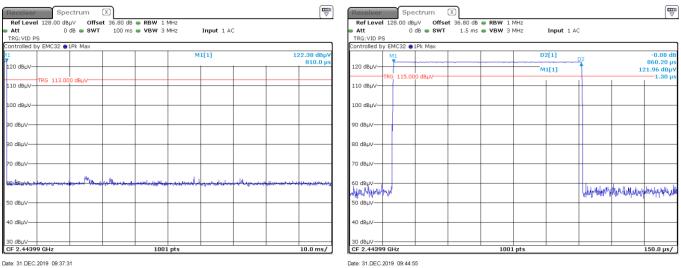


Figure 8.6-15: Transmission within 100 ms

.DE0.2010 00.44.00

#### *Figure 8.6-16: Pulse width = 0.86 ms*

Channel	Frequency,	Peak Field stren	gth, dBμV/m	Margin,	gin, correction factor. dBu	<b>o o</b> ,		Margin,
	MHz	Measured	Limit	dB	(dB)			dB
Tx-2402 MHz	2390.0	72.3	74.0	1.7	-41.3	31.0	54.0	23.0
Tx-2480 MHz	2483.5	73.7	74.0	0.3	-41.3	32.4	54.0	21.6
Tx-2479 MHz	2483.5	73.9	74.0	0.1	-41.3	32.6	54.0	21.4
Tx-2478 MHz	2483.5	72.6	74.0	1.4	-41.3	31.3	54.0	22.7
Tx Hopping	2390.0	70.8	74.0	3.2	-41.3	29.5	54.0	24.5
Tx Hopping	2483.5	73.8	74.0	0.2	-41.3	32.5	54.0	21.5

Table 8.6-4: Radiated Spurious emissions results

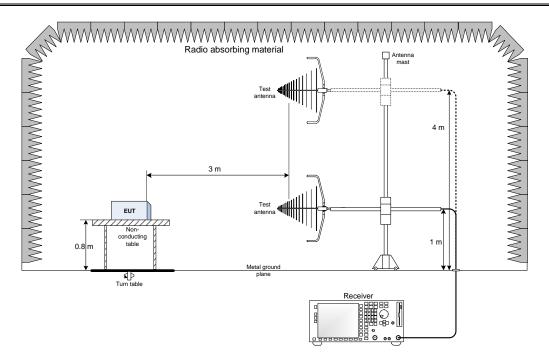
Notes: 1Calculated average field strength (dBµV/m) = Peak field strength (dBµV/m) + Duty cycle correction factor (dB). Duty cycle correction factor as calculated from \$15.35(c)

### All other spurious emissions within restricted bands were greater than 20 dB from limit

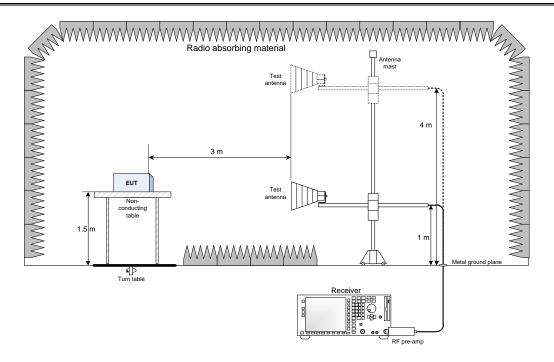


# Section 9. Block diagrams of test set-ups

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



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





### 9.3 Antenna port set-up

