FCC / ISED Test Report

FOR: Compology

Model Number: R13 & R13L (Variant)

Product Description:
Wireless device captures still images, GPS location and accelerometer information and transmits via the CAT-M1 network. Also includes BLE and NFC.

FCC ID: 2AO44-R13
IC ID: 23661-R13

Applied Rules and Standards:
47 CFR Part 15.247 (DTS)
RSS-247 Issue 2 (DTSs) & RSS-Gen Issue 5

REPORT #: EMC_COMPO_012_18001_FCC_15.247_ISED_BLE_DTS_rev3

DATE: 5/17/2019

A2LA Accredited

IC recognized # 3462B-2

***CETECOM* Inc.**
411 Dixon Landing Road ◆ Milpitas, CA 95035 ◆ U.S.A.
Phone: + 1 (408) 586 6200 ◆ Fax: + 1 (408) 586 6299 ◆ E-mail: info@cetecom.com ◆ http://www.cetecom.com
CETECOM Inc. is a Delaware Corporation with Corporation number: 2905571

TABLE OF CONTENTS

1 Assessment

The following device as further described in section 3 of this report was evaluated for radiated and conducted spurious emissions for unlicensed radio according to criteria specified in FCC rules 15.247 of Title 47 of the Code of Federal Regulations and the relevant ISED Canada standard RSS-GEN and RSS-247.

No deviations were ascertained.

According to section 5 of this report, the overall result is PASS.

Company	Description	Model #
Compology	Wireless device captures still images, GPS location and accelerometer inforamtion and transmits via the CAT-M1 network. Also includes BLE and NFC.	R13, R13L *1

*1: R13L is a Variant of R13. Check section 3 for more details.

Responsible for Testing Laboratory:

Date	Section	Name	Signature
5/17/2019	Compliance	Li, Cindy (Lab Manager)	Cindy Li Digitally signed by Cindy Li DN: cn=Cindy Li, o=Cetecom Inc., ou=EMC, email=cindy.li@cetecom.com, c=US Date: 2019.05.18 21:19:45 -07'00'

Responsible for the Report:

Date	Section	Name	Signature
5/17/2019	Compliance	Ghanma, Issa (EMC Engineer)	Digitally signed by: Issa Ghanma DN: CN = Issa Ghanma email = issa.ghanma@cetecom.com C = US O = CETECOM INC. OU = EMC Date: 2019.05.18 15:00:23 -07'00'

2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the EMC Test Report

Company Name:	CETECOM Inc.
Department:	Compliance
Street Address:	411 Dixon Landing Road
City/Zip Code	Milpitas, CA 95035
Country	USA
Telephone:	+1 (408) 586 6200
Fax:	+1 (408) 586 6299
Lab Manager:	Cindy Li
Responsible Project Leader:	Trina Noor

2.2 Identification of the Client

Applicant's Name:	Compology
Street Address:	1045 Brayent St. Suite 101
City/Zip Code	San Francisco , CA 94103
Country	USA

2.3 Identification of the Manufacturer

Manufacturer's Name:	Same as client.
Manufacturers Address:	----------
City/Zip Code	----------
Country	----------

3 Equipment Under Test (EUT)

3.1 EUT Specifications

Marketing name:	Oscar R13
Hardware Version Identification Number (HVIN):	R13, R13L
Product Marketing Name (PMN):	Oscar R13
Chipset manufacturer number:	BLUENRG-232
Frequency range / number of channels:	Nominal band: 2400 MHz – 2483.5 MHz; Center to center: 2402 MHz (ch 0) – 2480 MHz (ch 39), 40 channels
Type(s) of Modulation:	Bluetooth low energy 4.0 GFSK modulation.
Modes of Operation:	Bluetooth LE in both advertising and connected mode of operation
Max. measured output Powers [dBm **]:**	8.49
Antenna Information as declared:	Internal; 2450AT43B100E, 1.3dBi Peak
Power Supply/ Rated Operating Voltage Range [V DC **]:**	Low: 2.5, Nominal: 3.67, High: 3.9
Operating Temperature Range [ºC **]:**	Low: -20, Nominal: 20, High: 85
Other Radios included in the device:	1. Cellular: a. Module name: U-blox SARA-R410M-02B b. Model number: SARA-R410M-02B c. FCC ID: XPY2AGQN4NNN 2. GPS: a. Module name: U-blox EVA-M8M b. Model number: EVA-M8M-0
Sample Revision:	☐Prototype Unit; ☐Production Unit; ■Pre-Production
EUT Dimensions [inch **]:**	5” X 4” X 4”
Weight [lbs**]:**	1.5
EUT Diameter:	■ < 60 cm ☐ Other _____

3.2 EUT Sample details

EUT #	IMEI	HW Version	SW Version	Notes / Comments
1	357812090508802	rev_D	Oscar-0300	Used for conducted measurements.
EUT #	**Serial Number**	**HW Version**	**SW Version**	**Notes / Comments**
2	0286002653BC5D	rev_D	Oscar-0300	R13 / Primary device
3	0286002658C9BE	rev_D	Oscar-0300	• R13L / The "long turret" version of R13 that will be used in thick-walled containers. • The only difference in the electronics is a longer camera flex PCB and longer flash flex PCB; the main board with all RF systems is exactly the same as R13. • 2 of the 3 mechanical parts are different to accommodate the longer turret design.

3.3 Accessory Equipment (AE) details

AE #	Comments
-	-

3.4 Mode of Operation details

Mode of Operation	Description of Operating modes	Additional Information
Op. 1	BLE GFSK	Putty terminal tool and special commands provided by the customer used to configure the EUT to: • Modulated TX • Low, Mid, High channel. • Maximum output power. Note: The commands will not be available to the end user. For Radiated measurements: The internal antenna was connected. For Conducted measurements: The measurements equipment was connected to 50 ohm RF port of the EUT.

3.5 Justification for Worst Case Mode of Operation

The worst case mode of operation has been determined by evaluating the conducted results.
During the testing process the EUT was tested with transmitter sets on low, mid and high channels, and the highest duty cycle and output power.

For radiated measurements, all data in this report shows the worst case between horizontal and vertical antenna polarizations and for all orientations of the EUT.

4 Subject of Investigation

The objective of the measurements done by CETECOM Inc. was to assess the performance of the EUT according to the relevant requirements specified in FCC rules 15.247 of Title 47 of the Code of Federal Regulations and Radio Standard Specification RSS-247 Issue 2 and RSS-GEN Issue 5 of ISED Canada.

This test report is to support a request for new equipment authorization under the:

- FCC ID: 2AO44-R13
- IC ID: 23661-R13

Testing procedures are based on 558074 D01 DTS Meas Guidance v05 – "GUIDANCE FOR PERFORMING COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEMS (DTS) OPERATING UNDER SECTION 15.247" - April 5, 2017, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.

5 Measurement Results Summary

Test Specification	Test Case	Temperature and Voltage Conditions	Mode	Pass	NA	NP	Result
§15.247(a)(2) RSS-247 5.2(a)	Emission Bandwidth	Nominal	BT LE	■	☐	☐	Complies
§15.247(e) RSS-247 5.2(b)	Power Spectral Density	Nominal	BT LE	■	☐	☐	Complies
§15.247(b)(3) RSS-247 5.4(d)	Maximum Conducted Output Power and EIRP	Nominal	BT LE	■	☐	☐	Complies
§15.247(d) RSS-247 5.5	Band edge compliance Unrestricted Band Edges	Nominal	BT LE	■	☐	☐	Complies
§15.247; 15.209; 15.205 RSS-247 5.5; Gen 8.9; 8.10	Band edge compliance Restricted Band Edges	Nominal	BT LE	■	☐	☐	Complies
§15.247(d); §15.209 RSS-Gen 6.13	TX Spurious emissions-Radiated	Nominal	BT LE	■	☐	☐	Complies
§15.207(a) RSS Gen 8.8	AC Conducted Emissions	Nominal	BT LE	☐	■	☐	Complies Note 1 Note 2

Note1: NA= Not Applicable; NP= Not Performed.
Note2: Device does not connect to and AC main.

6 Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the apparatus, with 95% confidence interval (in dB delta to result), based on a coverage factor k=1.

Radiated measurement

9 kHz to 30 MHz	±2.5 dB (Magnetic Loop Antenna)
30 MHz to 1000 MHz	±2.0 dB (Biconilog Antenna)
1 GHz to 40 GHz	±2.3 dB (Horn Antenna)

Conducted measurement

150 kHz to 30 MHz	±0.7 dB (LISN)
RF conducted measurement	±0.5 dB

According to TR 102 273 a multiplicative propagation of error is assumed for RF measurement systems. For this reason the RMS method is applied to dB values and not to linear values as appropriate for additive propagation of error. Also used: http://physics.nist.gov/cuu/Uncertainty/typeb.html. The above calculated uncertainties apply to direct application of the Substitution method. The Substitution method is always used when the EUT comes closer than 3 dB to the limit.

6.1 Environmental Conditions During Testing:

The following environmental conditions were maintained during the course of testing:

- Ambient Temperature: 20-25° C
- Relative humidity: 40-60%

6.2 Dates of Testing:

02/25/2019 – 03/01/2019

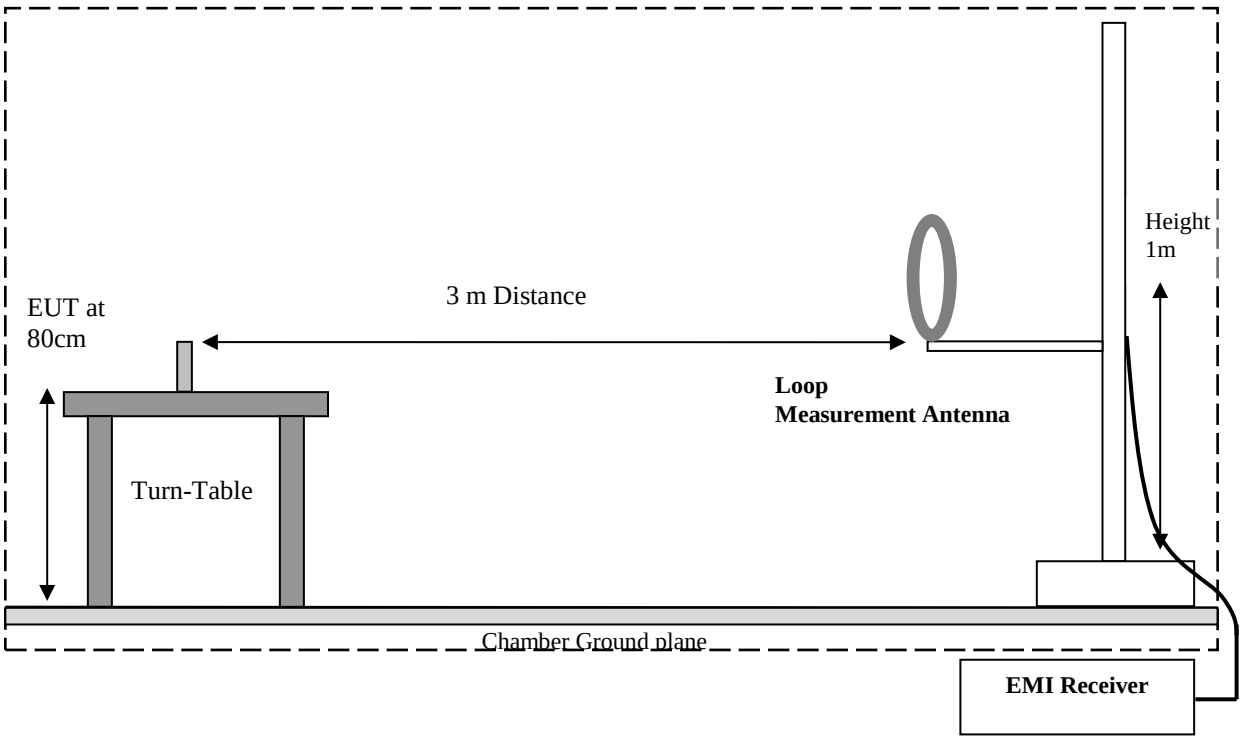
7 Measurement Procedures

7.1 Radiated Measurement

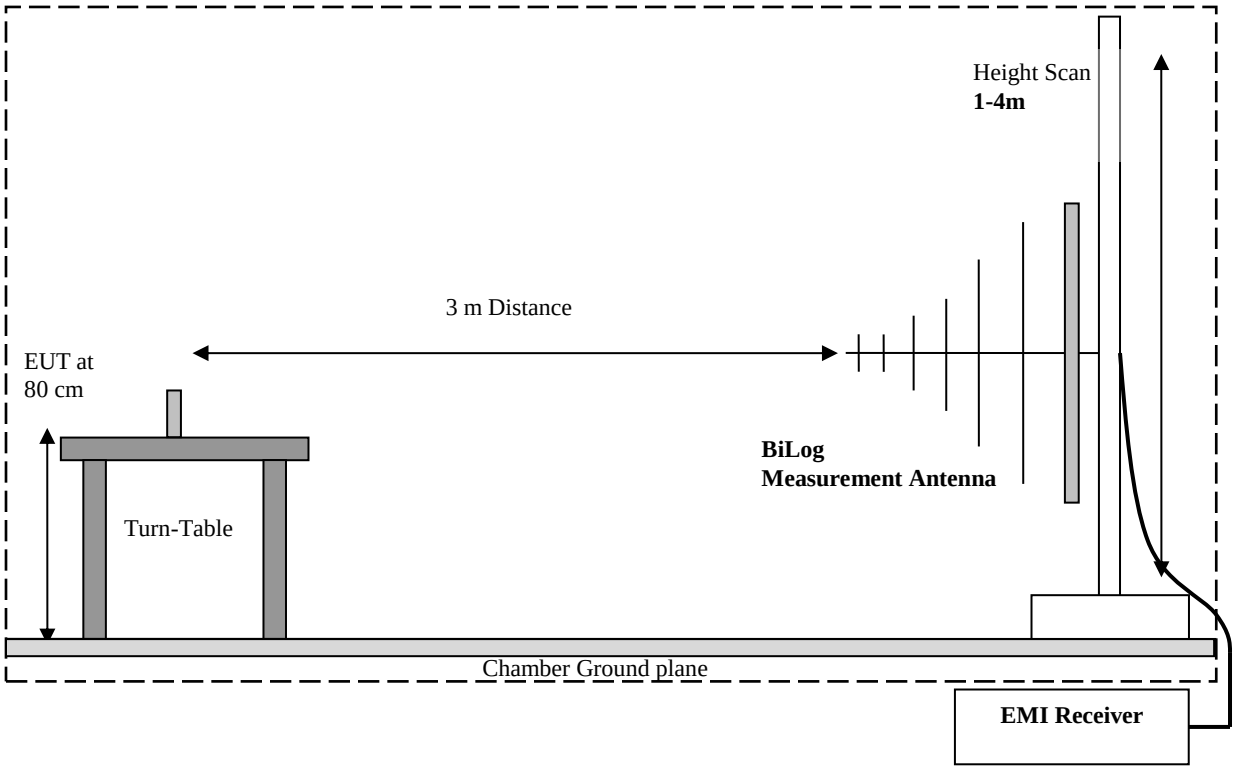
The radiated measurement is performed according to ANSI C63.10 (2013)

- The exploratory measurement is accomplished by running a matrix of 16 sweeps over the required frequency range with R&S Test-SW EMC32 for 4 positions of the turntable, two orthogonal positions of the EUT and both antenna polarizations. This procedure exceeds the requirement of the above standards to cover the 3 orthogonal axis of the EUT. A max peak detector is utilized during the exploratory measurement. The Test-SW creates an overall maximum trace for all 12 sweeps and saves the settings for each point of this trace. The maximum trace is part of the test report.
- The 10 highest emissions are selected with an automatic algorithm of EMC32 searching for peaks in the noise floor and ensuring that broadband signals are not selected multiple times.
- The maxima are then put through the final measurement and again maximized in a 90deg range of the turntable, fine search in frequency domain and height scan between 1m and 4m.
- The above procedure is repeated for all possible ways of power supply to EUT and for all supported modulations.
- In case there are no emissions above noise floor level only the maximum trace is reported as described above.
- The results are split up into up to 4 frequency ranges due to antenna bandwidth restrictions. A magnetic loop is used from 9 kHz to 30 MHz, a Biconilog antenna is used from 30 MHz to 1 GHz, and two different horn antennas are used to cover frequencies up to 40 GHz.

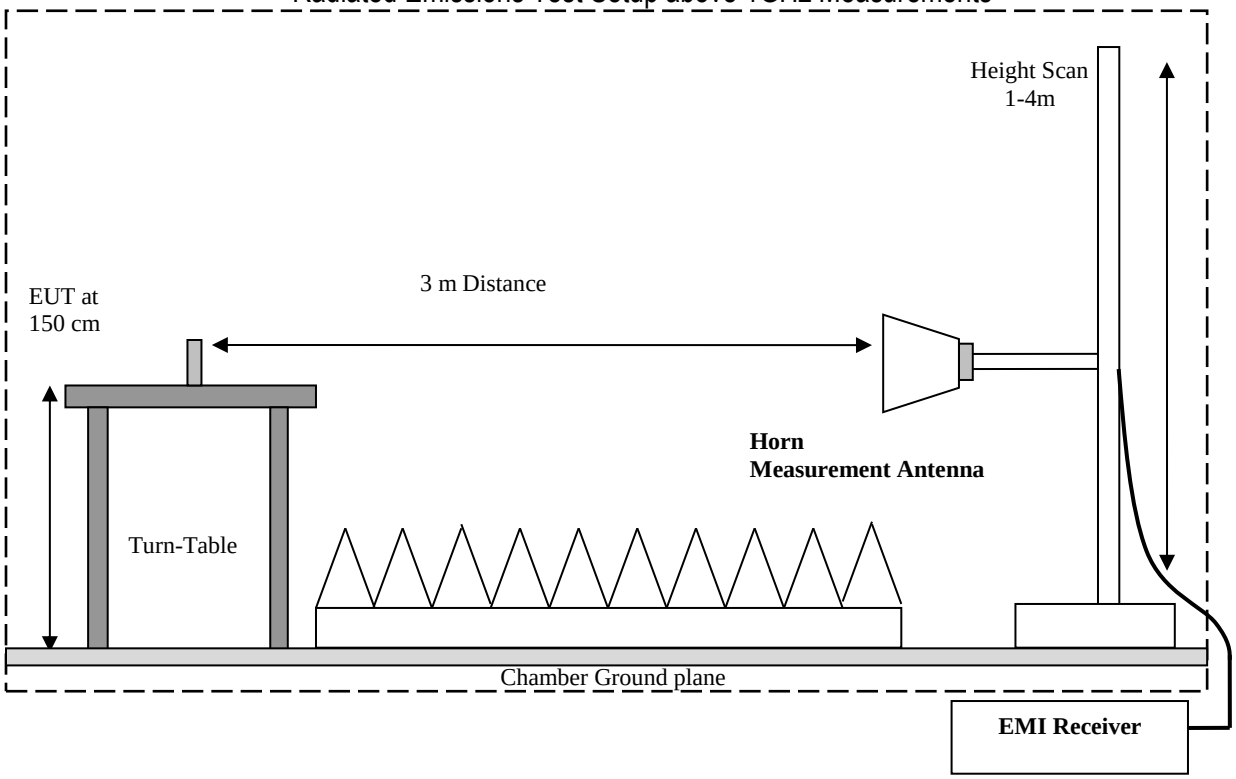
Radiated Emissions Test Setup below 30MHz Measurements



Radiated Emissions Test Setup 30MHz-1GHz Measurements



Radiated Emissions Test Setup above 1GHz Measurements



7.1.1 Sample Calculations for Field Strength Measurements

Field Strength is calculated from the Spectrum Analyzer/ Receiver readings, taking into account the following parameters:

1. Measured reading in dBµV
2. Cable Loss between the receiving antenna and SA in dB and
3. Antenna Factor in dB/m

All radiated measurement plots in this report are taken from a test SW that calculates the Field Strength based on the following equation:

FS (dBµV/m) = Measured Value on SA (dBµV)- Cable Loss (dB)+ Antenna Factor (dB/m)

Example:

Frequency (MHz)	Measured SA (dBµV)	Cable Loss (dB)	Antenna Factor Correction (dB)	Field Strength Result (dBµV/m)
1000	80.5	3.5	14	98.0

7.2 RF Conducted Measurement Procedure

Testing procedures are based on 558074 D01 DTS Meas Guidance v05 – "GUIDANCE FOR PERFORMING COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEMS (DTS) OPERATING UNDER SECTION 15.247" - April 5, 2017, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.

- Connect the equipment as shown in the above diagram.
- Adjust the settings of the SA (Rohde-Schwarz Spectrum Analyzer) to connect the EUT at the required mode of test.
- Measurements are to be performed with the EUT set to the low, middle and high channels and for worst case modulation schemes.

8 Test Result Data

8.1 Emission Bandwidth 6dB and 99% Occupied Bandwidth

8.1.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05

Spectrum Analyzer settings:

- Set RBW = 100 kHz
- Set the video bandwidth (VBW) ≥ 3 x RBW
- Detector = Peak
- Trace mode = Max hold
- Sweep = Auto couple
- Allow the trace to stabilize
- Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

8.1.2 Limits:

➢ FCC §15.247(a) (2):

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

➢ RSS-247 5.2:

- DTSs include systems that employ digital modulation techniques resulting in spectral characteristics similar to direct sequence systems. The following applies to the bands 902-928 MHz and 2400-2483.5 MHz:

  a. The minimum 6 dB bandwidth shall be 500 kHz.

8.1.3 Test conditions and setup:

Ambient Temperature	EUT #	EUT operating mode	Power Input
22° C	1	Op.1	3.67v DC

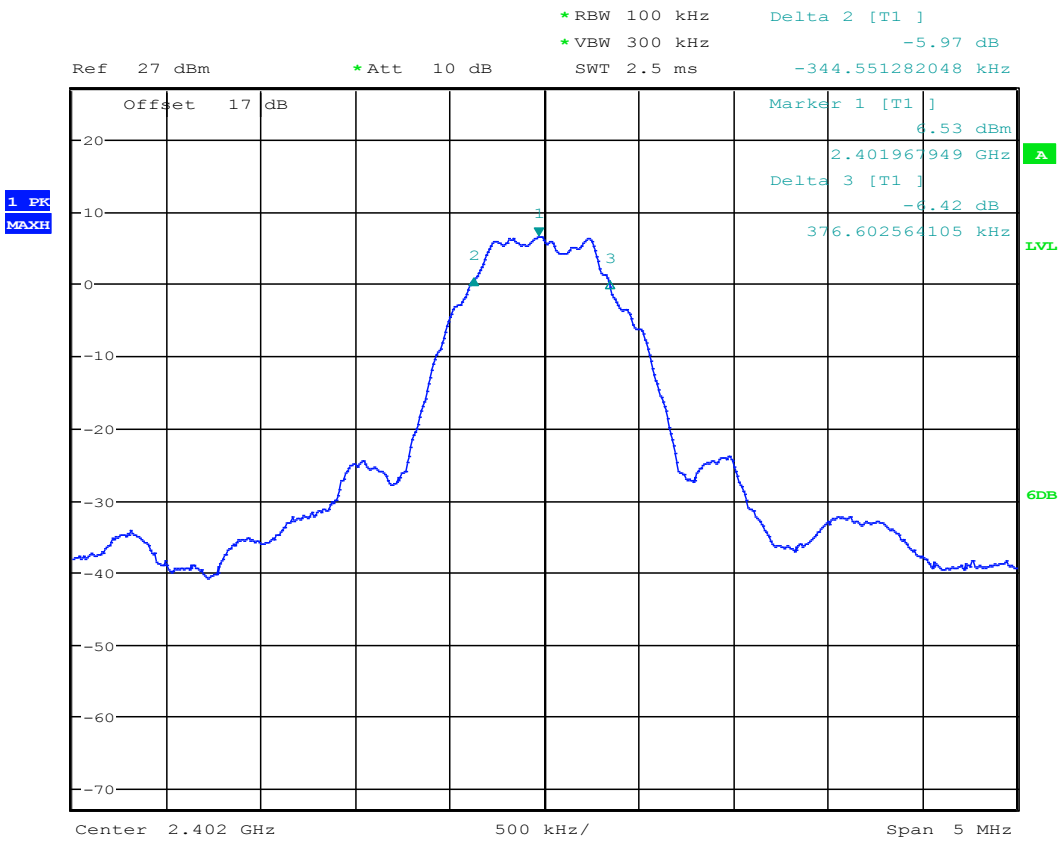
8.1.4 Measurement result:

Plot #	Frequency (MHz)	6dB Emissions Bandwidth (MHz)	Limit (MHz)	Result
1	2402	0.721	> 0.5	Pass
2	2440	0.721	> 0.5	Pass
3	2480	0.713	> 0.5	Pass

Plot #	Frequency (MHz)	99% Occupied Bandwidth (MHz)	Limit (MHz)	Result
4	2402	1.05	> 0.5	Pass
5	2440	1.04	> 0.5	Pass
6	2480	1.04	> 0.5	Pass

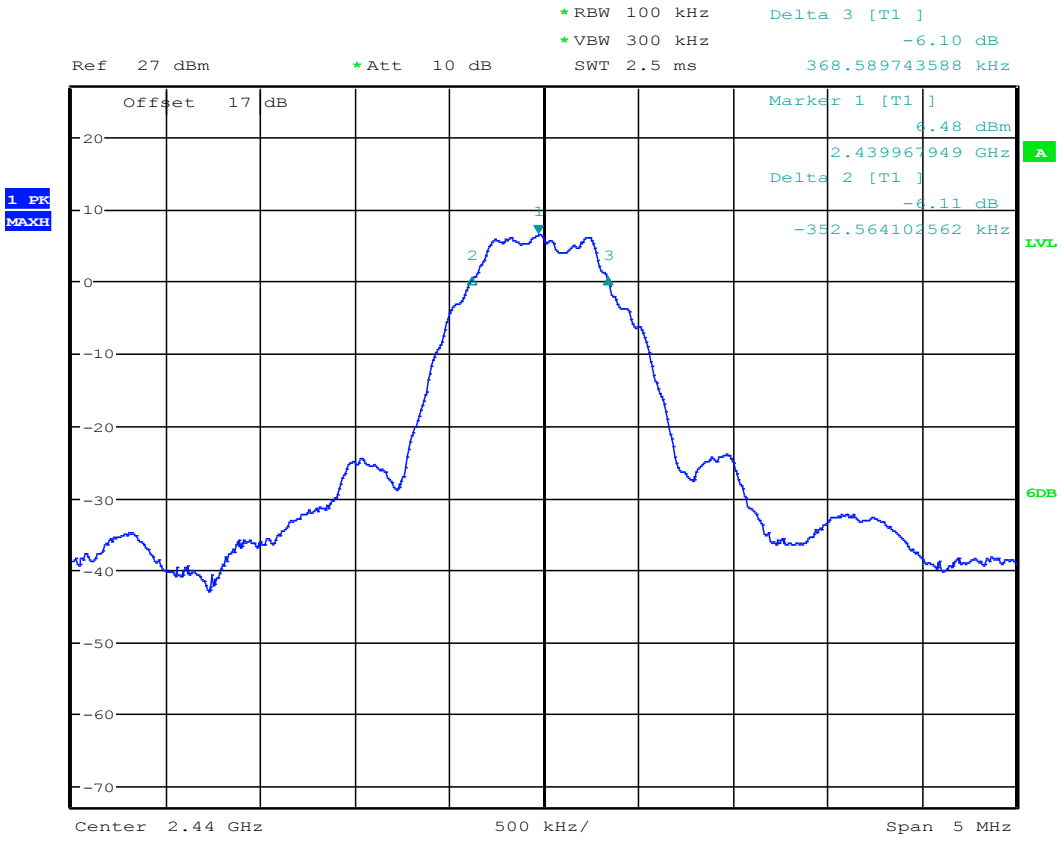
8.1.5 Measurement Plots:

Plot #1	
2402 MHz	GFSK



Plot #2

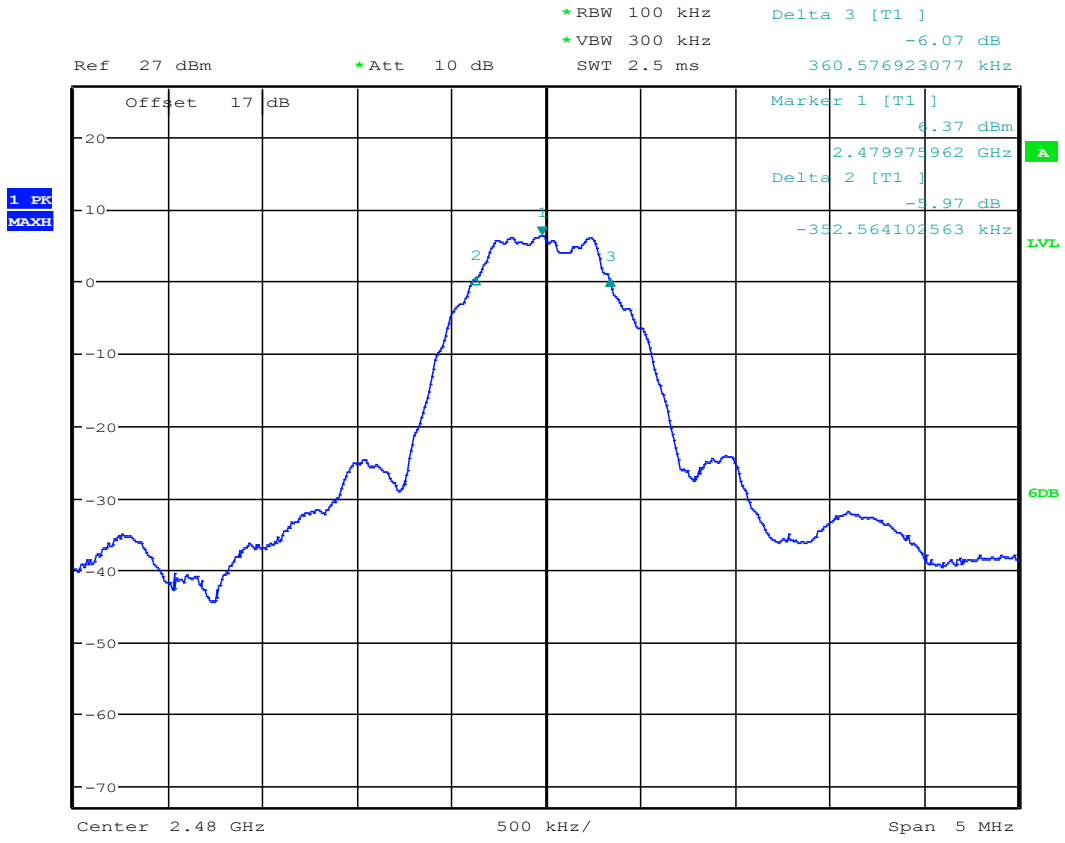
2440 MHz	GFSK



Date: 25.FEB.2019 19:07:23

Plot #3

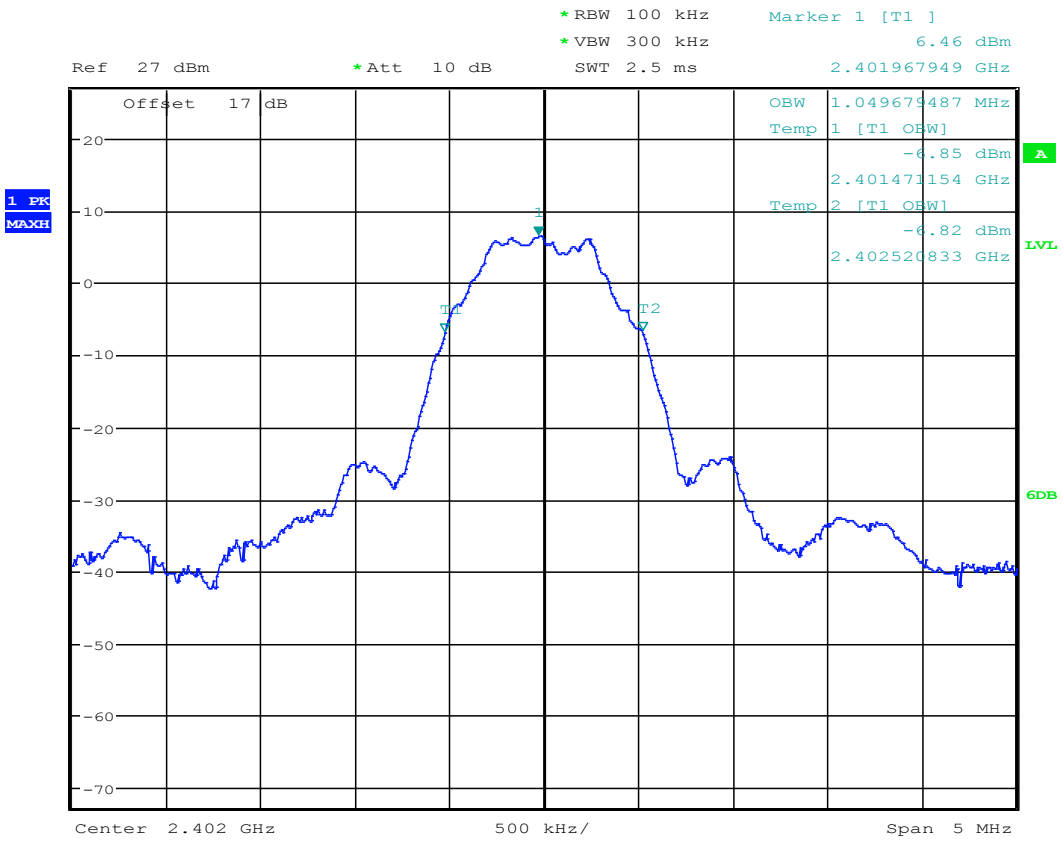
2480 MHz	GFSK



Date: 25.FEB.2019 19:12:09

Plot #4

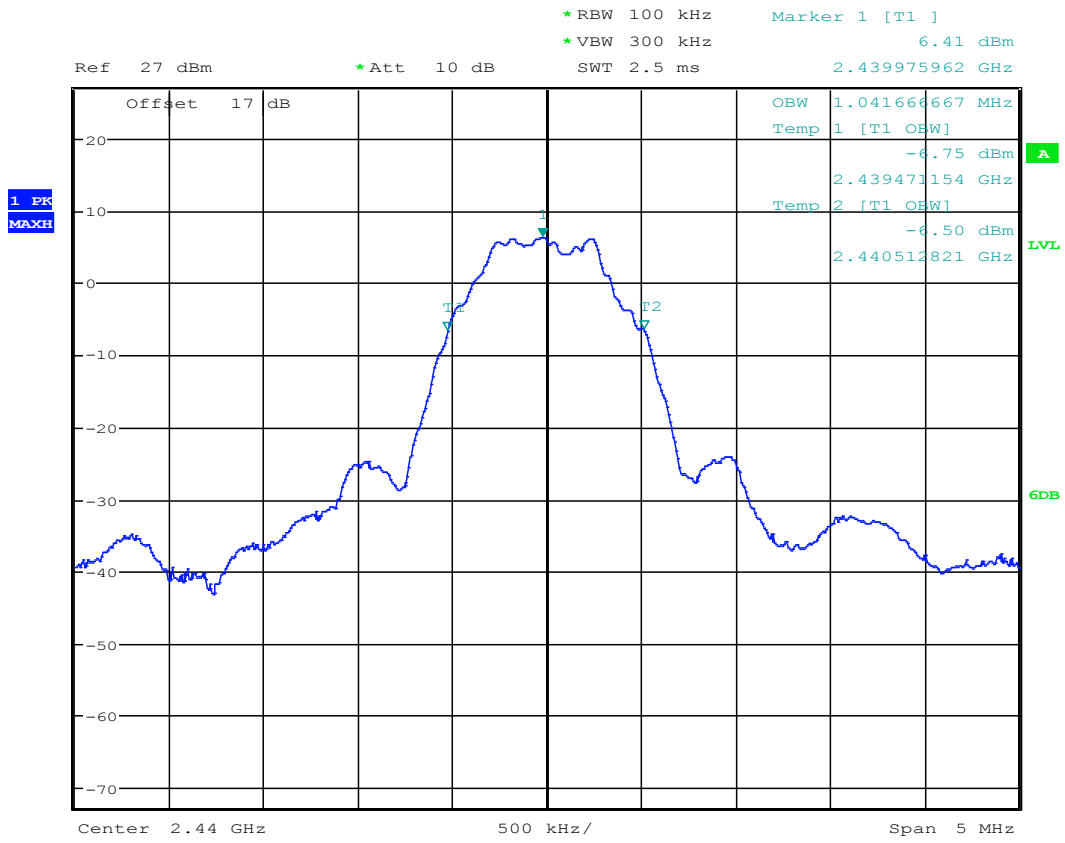
2402 MHz	GFSK



Date: 25.FEB.2019 19:16:42

Plot #5

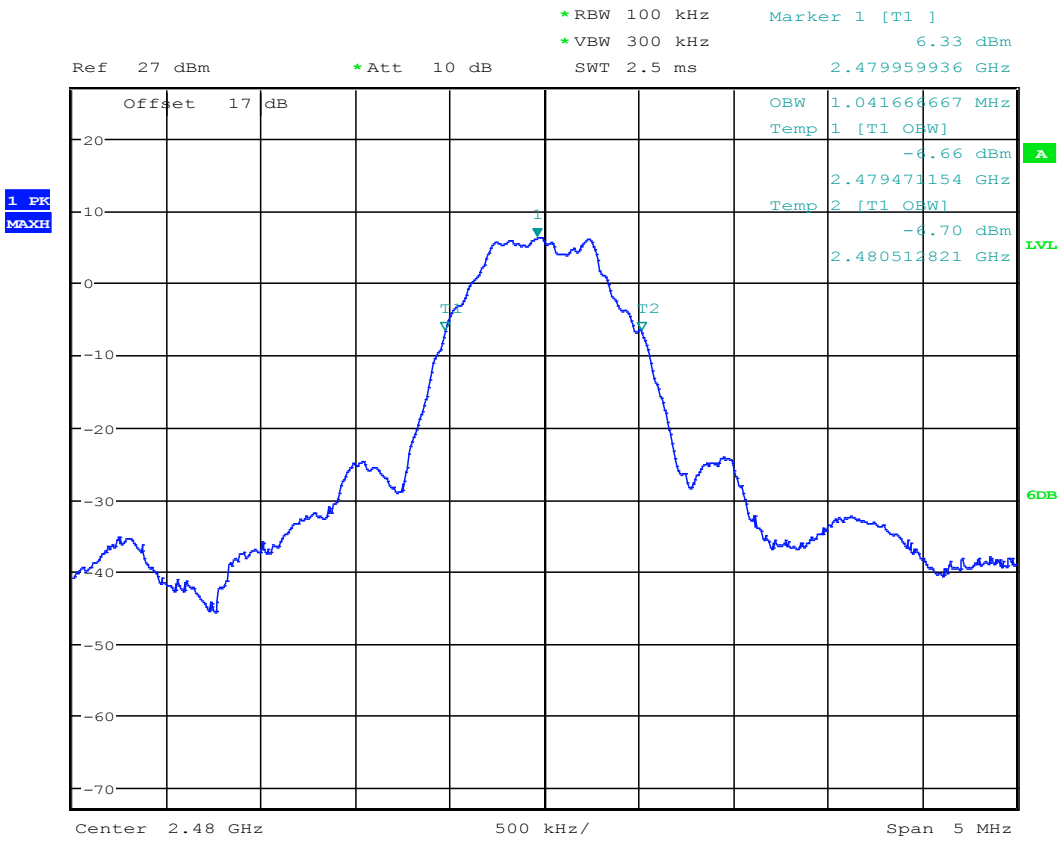
2440 MHz	GFSK



Date: 25.FEB.2019 19:15:36

Plot #6

2480 MHz	GFSK



Date: 25.FEB.2019 19:14:04

8.2 Power Spectral Density

8.2.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05

Spectrum Analyzer settings for Peak PSD method:

- Set analyzer center frequency to DTS channel center frequency
- Set the span to 1.5 x DTS bandwidth
- Set RBW to: 3 kHz ≤ RBW ≤ 100 kHz
- Set the VBW ≥ 3 x RBW
- Detector = Peak
- Sweep time = Auto couple
- Trace mode = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level within the RBW
- If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat

8.2.2 Limits:

➢ FCC§15.247

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

➢ RSS-247 5.2

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

8.2.3 Test conditions and setup:

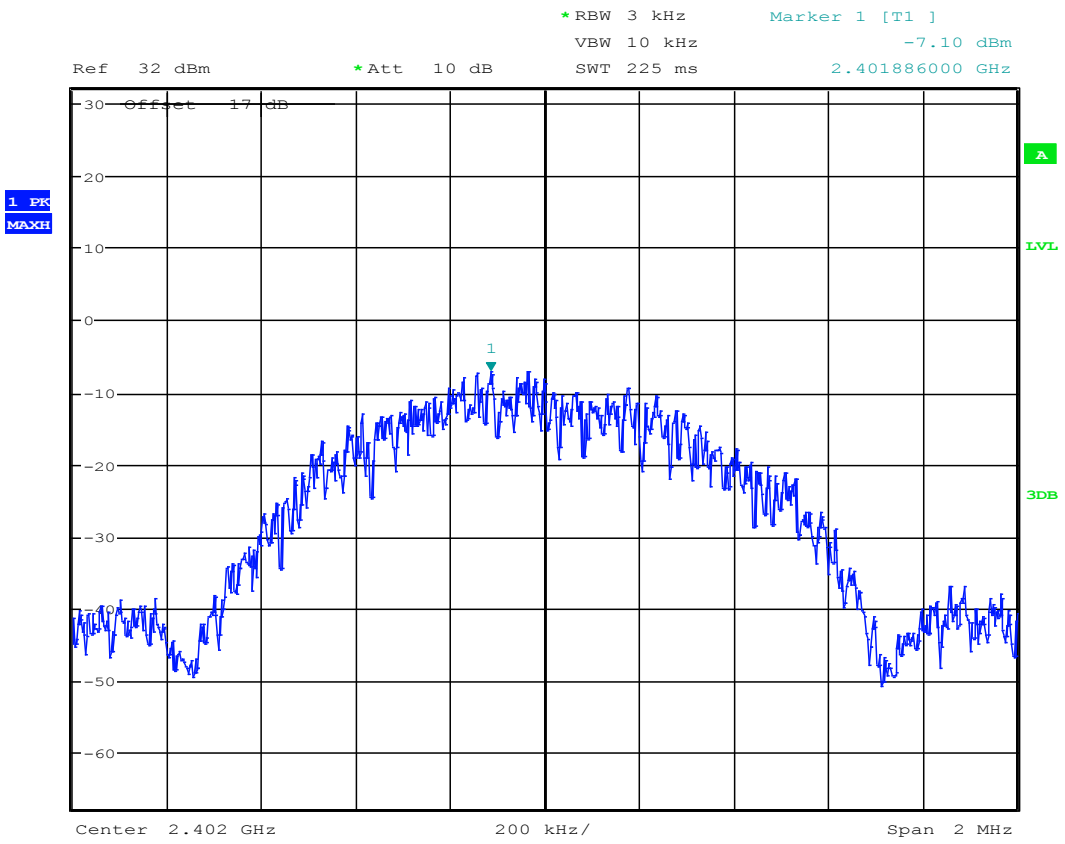
Ambient Temperature	EUT #	EUT operating mode	Power Input	Antenna Gain
22° C	1	Op.1	3.67v DC	1.3 dBi

8.2.4 Measurement result:

Plot #	Frequency [MHz]	Peak Power Spectral Density [dBm/3 kHz]	PSD Adjusted for Antenna Gain [dBm/3 kHz]	Limit [dBm/3 kHz]	Result
1	2402	-7.10	-5.8	8	Pass
2	2441	-7.24	-5.94	8	Pass
3	2480	-7.35	-6.05	8	Pass

8.2.5 Measurement Plots:

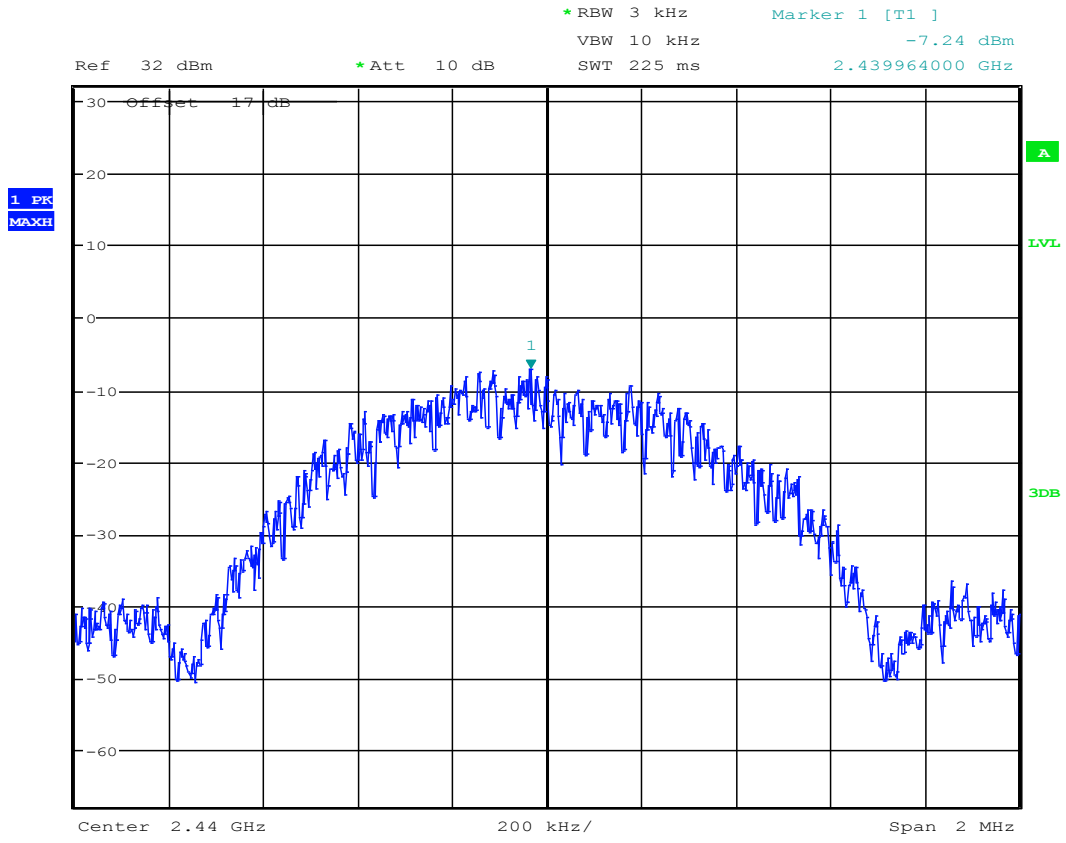
Plot #1	
2402 MHz	GFSK



Date: 25.FEB.2019 19:53:58

Plot #2

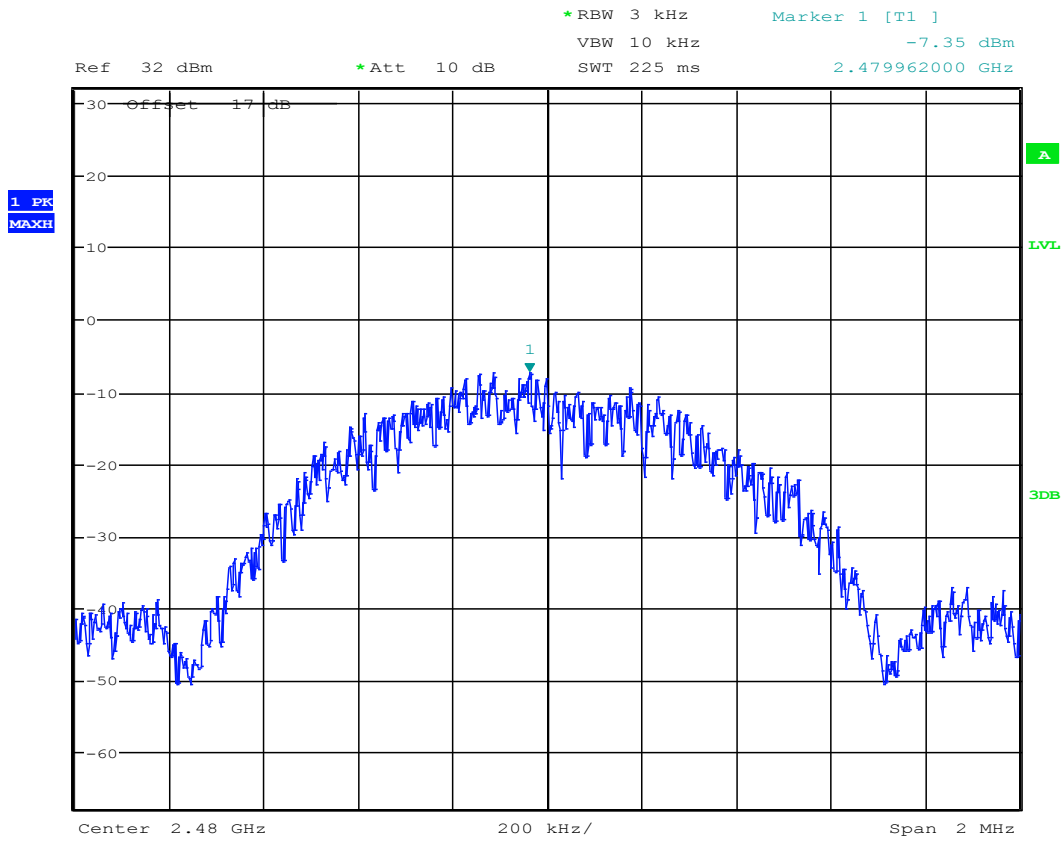
2440 MHz	GFSK



Date: 25.FEB.2019 19:51:47

Plot #3

2480 MHz	GFSK



Date: 25.FEB.2019 19:50:33

8.3 Maximum Peak Conducted Output Power

8.3.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05

Spectrum Analyzer settings:

- RBW ≥ DTS bandwidth
- VBW ≥ 3 x RBW
- Span ≥ 3 x RBW
- Sweep = Auto couple
- Detector function = Peak
- Trace = Max hold
- Use peak marker function to determine the peak amplitude level

8.3.2 Limits:

Maximum Peak Output Power:

- FCC §15.247 (b):
  - (3) For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

- IC RSS-247 5.4:
  - d. For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

  - As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

8.3.3 Test conditions and setup:

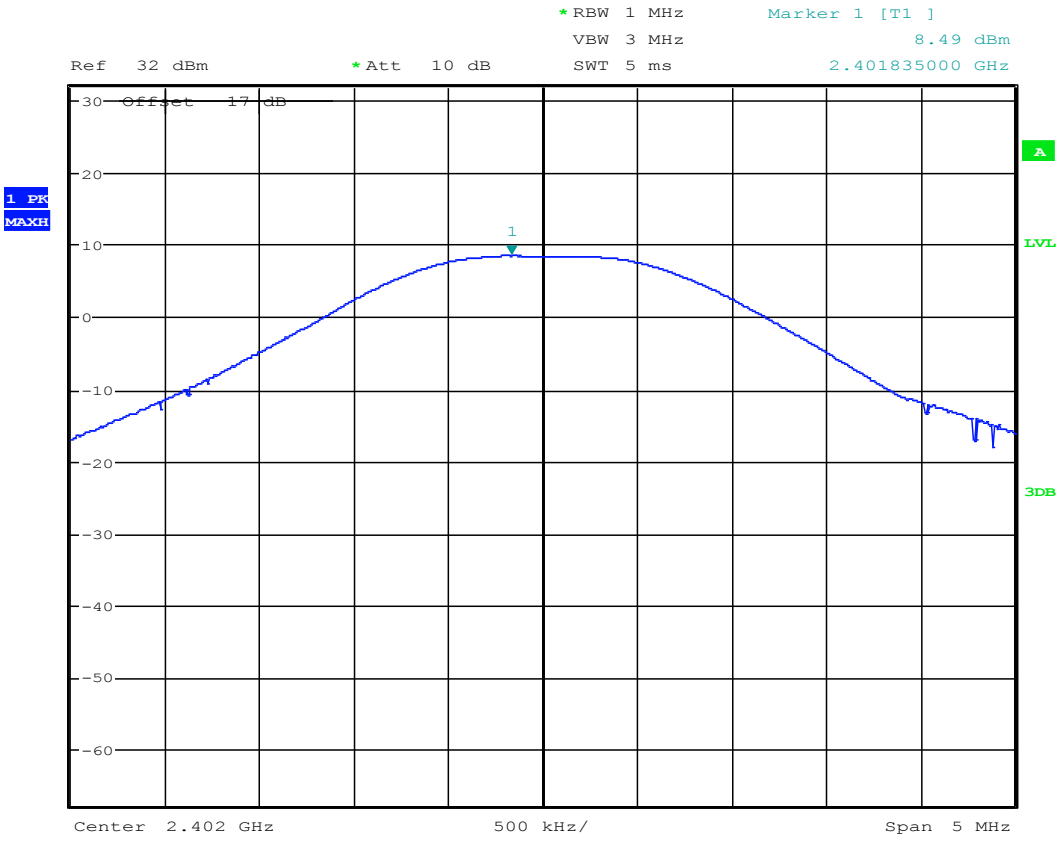
Ambient Temperature	EUT #	EUT operating mode	Power Input	Antenna Gain
22° C	1	Op.1	3.67v DC	1.3 dBi

8.3.4 Measurement result:

Plot #	Frequency (MHz)	Maximum Peak Conducted Output Power (dBm)	EIRP (dBm)	Limit (dBm)	Result
1	2402	8.49	9.79	30 (Pk) / 36 (EIRP)	Pass
2	2441	8.45	9.75	30 (Pk) / 36 (EIRP)	Pass
3	2480	8.33	9.63	30 (Pk) / 36 (EIRP)	Pass

8.3.5 Measurement Plots:

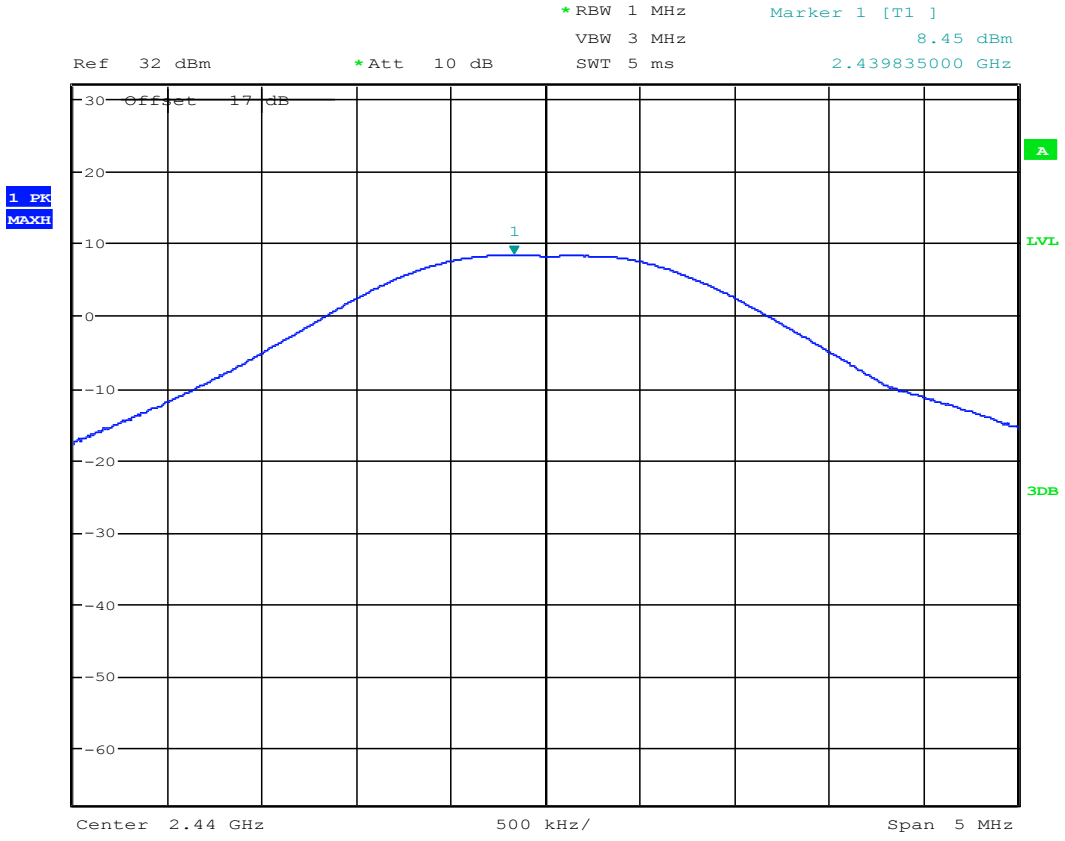
Plot #1	
2402 MHz	GFSK



Date: 25.FEB.2019 19:30:57

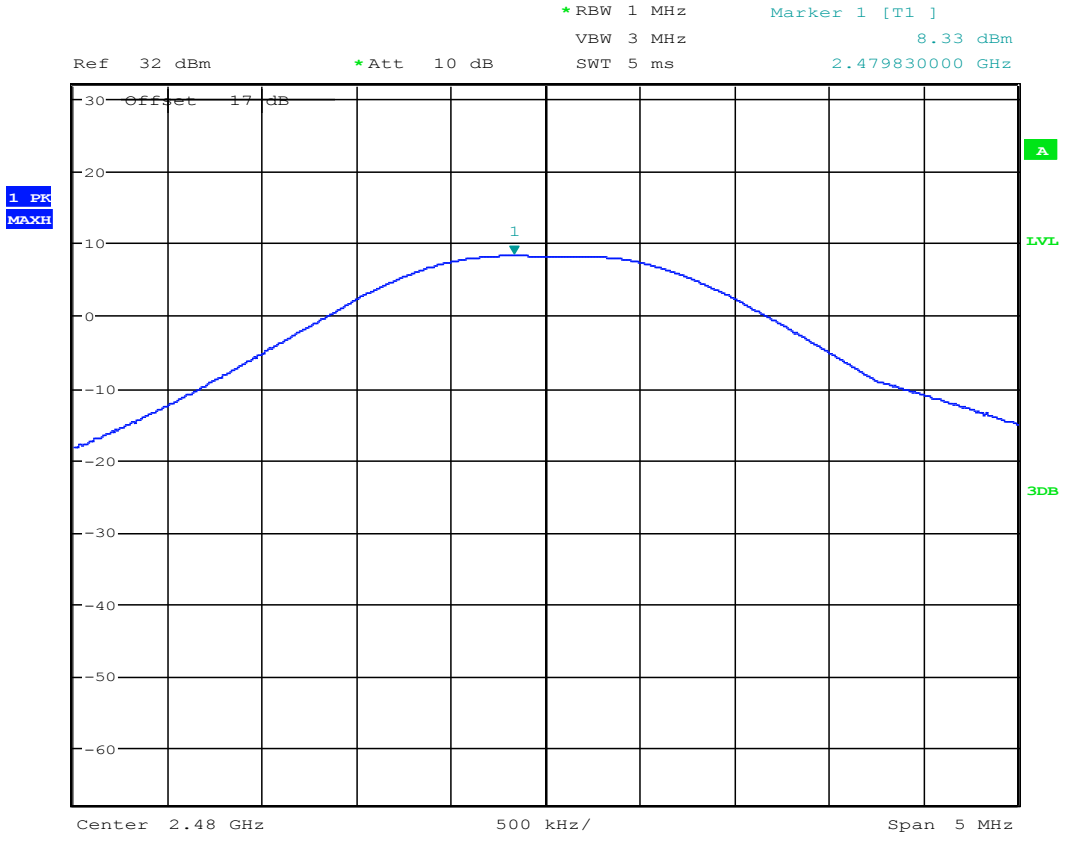
Plot #2

2440 MHz	GFSK



Plot #3

2480 MHz	GFSK



8.4 Band Edge Compliance

8.4.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05

Spectrum Analyzer settings for band edge:

- Set the center frequency and span to encompass frequency range to be measured
- RBW = 100 kHz
- VBW ≥ 3 x RBW
- Sweep Time: Auto couple
- Detector = Peak
- Trace = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level
- Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge

8.4.2 Limits non restricted band:

➢ FCC§15.247

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

➢ RSS-247 5.5

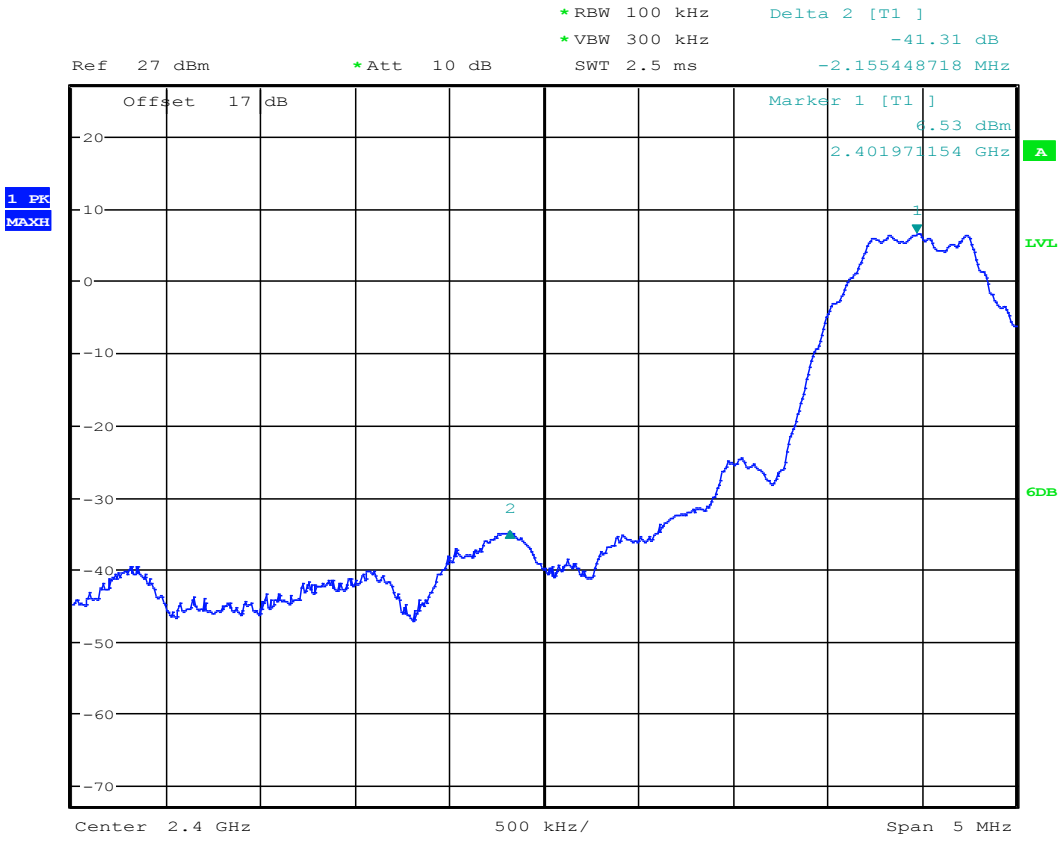
- In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either 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.

8.4.3 Measurement result:

Plot #	EUT #	EUT operating mode	Band Edge	Band Edge Delta (dBc)	Limit (dBc)
1	1	Op.1	Lower, Non-restricted	41.31	>20

8.4.4 Measurement plots

Plot #1	
2402 MHz	GFSK



Date: 25.FEB.2019 19:02:28

Spectrum Analyzer settings for restricted band:

- Peak measurements are made using a peak detector and RBW=1 MHz

8.4.5 Limits restricted band §15.247/15.209/15.205

- *PEAK LIMIT= 74 dBµV/m @3m =-21.23 dBm
- *AVG. LIMIT= 54 dBµV/m @3m =-41.23 dBm
- Start frequency & stop frequency according to frequency range specified in the restricted band table in FCC section 15.205 & RSS-Gen 8.10
- Measurements with a peak detector were used to show compliance to average limits, thus showing compliance to both peak and average limits.

(a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
[1]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			

8.4.6 Test conditions and setup:

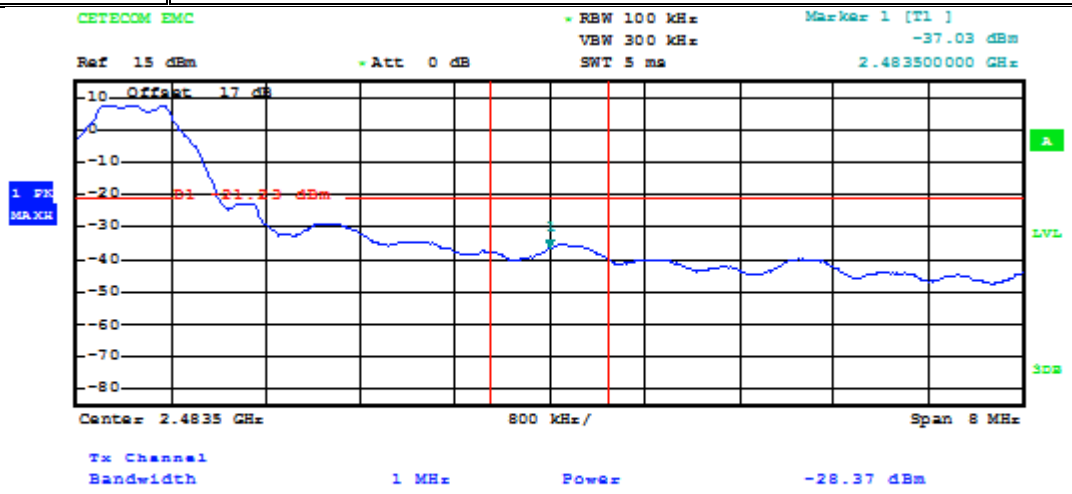
Ambient Temperature	EUT #	EUT operating mode	Power Input	Antenna Gain
22° C	1	Op.1	3.67v DC	1.3 dBi

8.4.7 Measurement result:

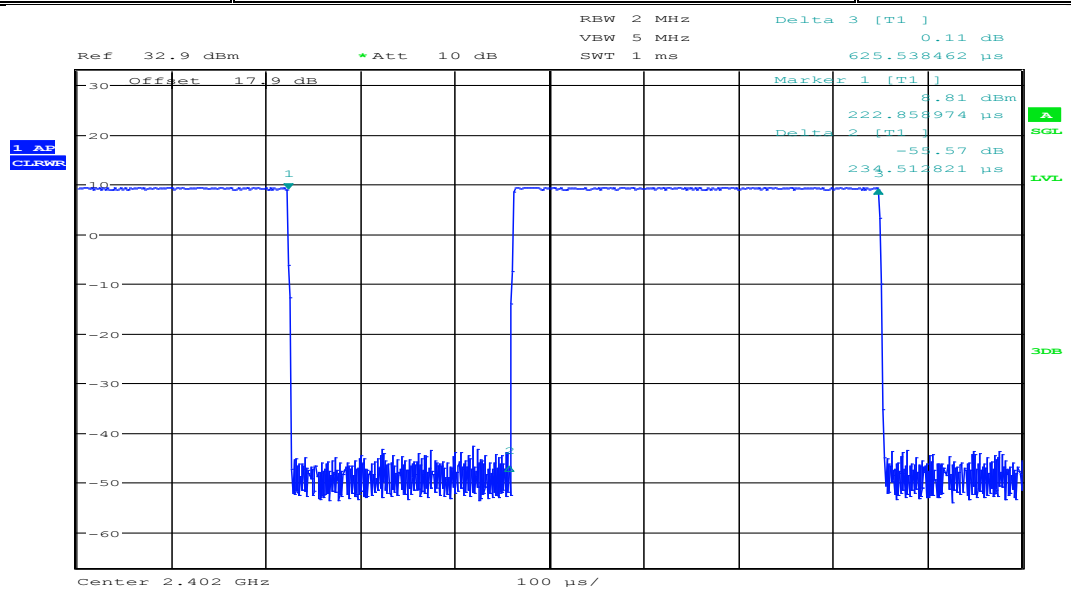
Plot #	Band Edge	Measured Peak, Average Values (dBm)	Corrected by Antenna Gain (dBm)	Limit (dBm)	Result
1	Upper Restricted Peak	-28.37	-27.07	-21.23 Peak	Pass
2	Upper Restricted Average	-45.37	-44.07 • And corrected for duty cycle= -41.95	-41.23 AVG	Pass

8.4.8 Measurement plot:

Plot #1	
2480 MHz	GFSK

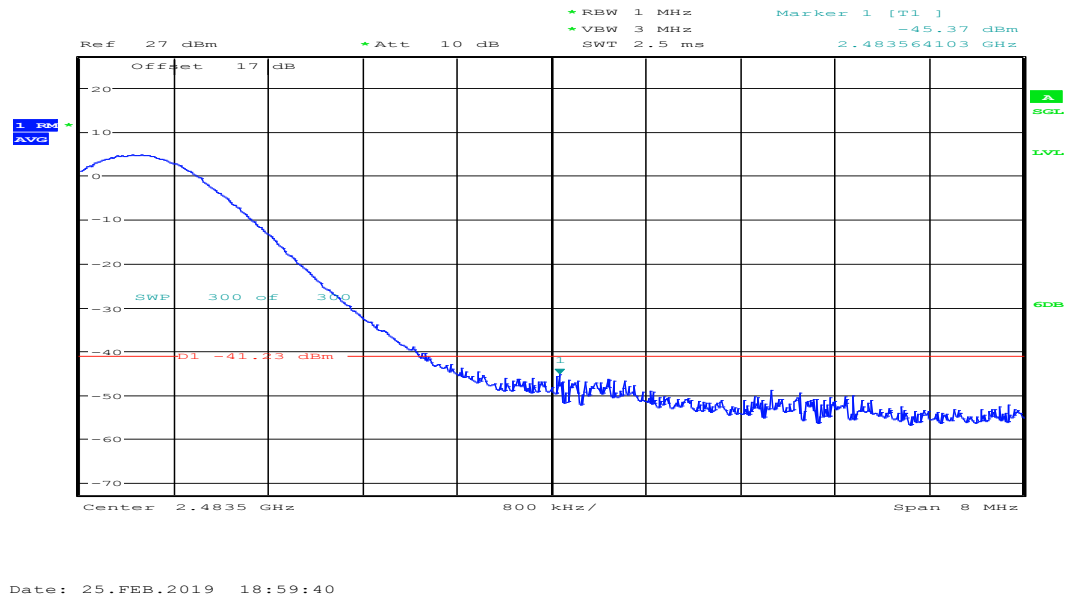


Zero-Span measurement method		
RBW & VBW > 50/T	**# of sweep points across T > 100**	**Duty cycle 61.4%**



- 10*Log(1/Duty cycle) = 2.12 dB

Plot #2	
2480 MHz	**GFSK**



8.5 Radiated Transmitter Spurious Emissions and Restricted Bands

8.5.1 Measurement according to ANSI C63.10 (2013)

Spectrum Analyzer Settings:

- Frequency = 9 KHz – 30 MHz
- RBW = 9 KHz
- Detector: Peak

- Frequency = 30 MHz – 1 GHz
- Detector = Peak / Quasi-Peak
- RBW= 120 KHz (<1GHz)

- Frequency > 1 GHz
- Detector = Peak / Average
- RBW = 1 MHz

- Radiated spurious emissions shall be measured for the transmit frequencies, transmit power, and data rate for the lowest, middle and highest channel in each frequency band of operation and for the highest gain antenna for each antenna type, and using the appropriate parameters and test requirements.
- The highest (or worst-case) data rate shall be recorded for each measurement.
- For testing at distance other than the specified in the standard, the limit conversion is calculated by using 40 dB/decade extrapolation factor as follow: Conversion factor (CF) = 40 log (D/d) = 40 log (300m / 3m) = 80dB

8.5.2 Limits:

FCC §15.247

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

FCC §15.209 & RSS-Gen 8.9

- Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency of emission (MHz)	Field strength (µV/m)	Measurement Distance (m)	Field strength @ 3m (dBµV/m)
0.009–0.490	2400/F(kHz) / ---------	300	-
0.490–1.705	24000/F(kHz) / --------	30	-
1.705–30.0	30 / (29.5)	30	-
30–88	100	3	40 dBµV/m
88–216	150	3	43.5 dBµV/m
216–960	200	3	46 dBµV/m
Above 960	500	3	54 dBµV/m

FCC §15.205 & RSS-Gen 8.10

- Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
[1]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			

- 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)).
  *PEAK LIMIT= 74 dBµV/m
  *AVG. LIMIT= 54 dBµV/m

8.5.3 Test conditions and setup:

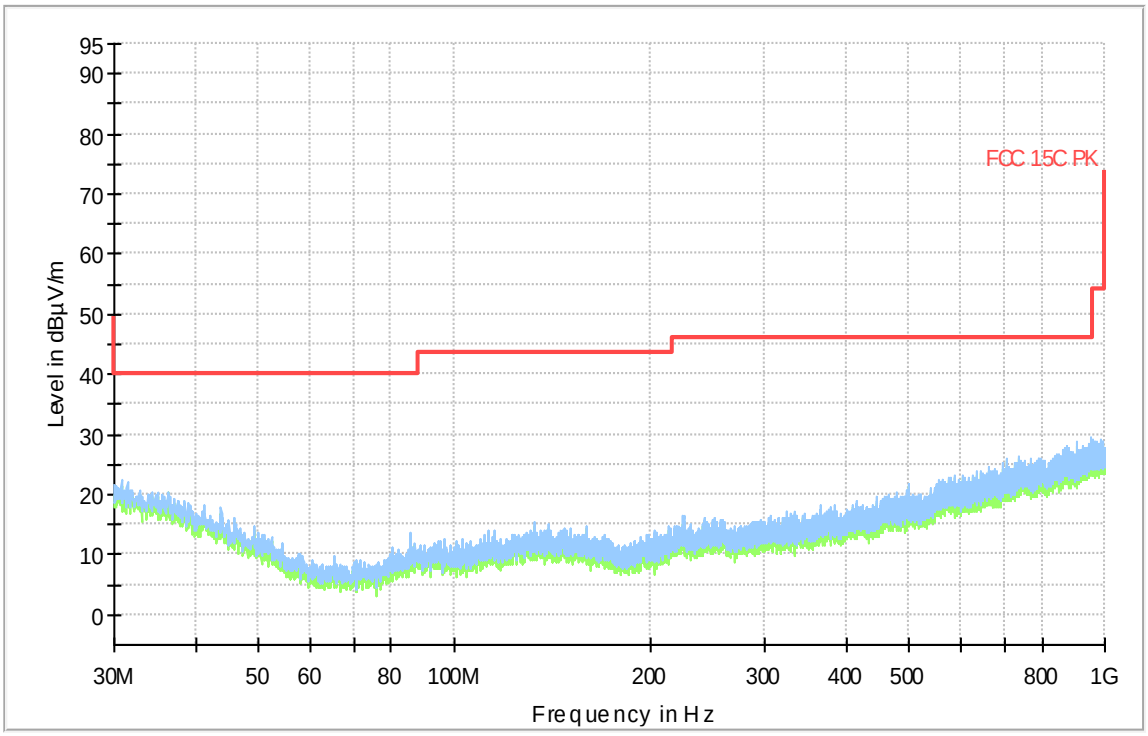
Ambient Temperature	EUT operating mode	Power Input
23° C	Op.1	12 VDC

8.5.4 Measurement result:

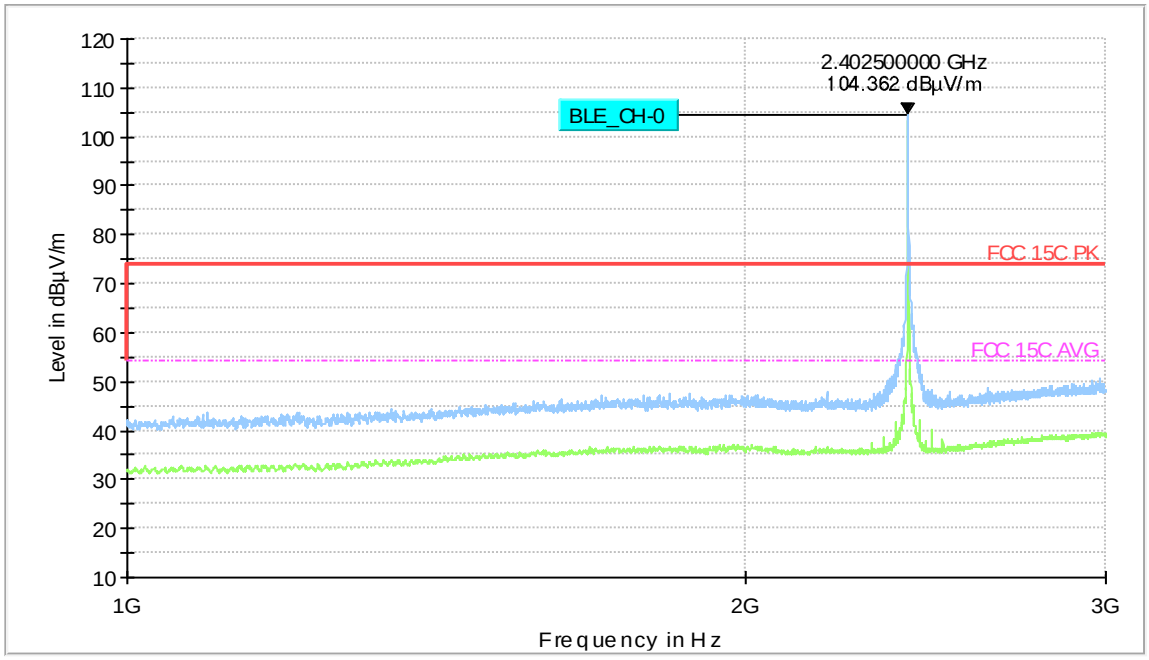
Plot #	Channel #	EUT #	Scan Frequency	Critical Frequency [MHz]	Emission level [dBuV/m]	Detector	Limit	Result
1 – 3	0	2	30 MHz – 18 GHz	14413.4	51.02	RMS	See section 8.5.2	Pass
4 – 8	19	2	9 kHz – 40 GHz	14638.3	53.42	RMS	See section 8.5.2	Pass
9 – 11		3	30 MHz – 18 GHz	12201.2	43.59	RMS	See section 8.5.2	Pass
12 – 14	39	2	30 MHz – 18 GHz	7439.3	44.7	RMS	See section 8.5.2	Pass

8.5.5 Measurement Plots:

Plot # 1 Radiated Emissions: 30MHz – 1GHz	
Modulation: GFSK	**Channel: 0**



Plot # 2 Radiated Emissions: 1 – 3GHz	
Modulation: GFSK	**Channel: 0**

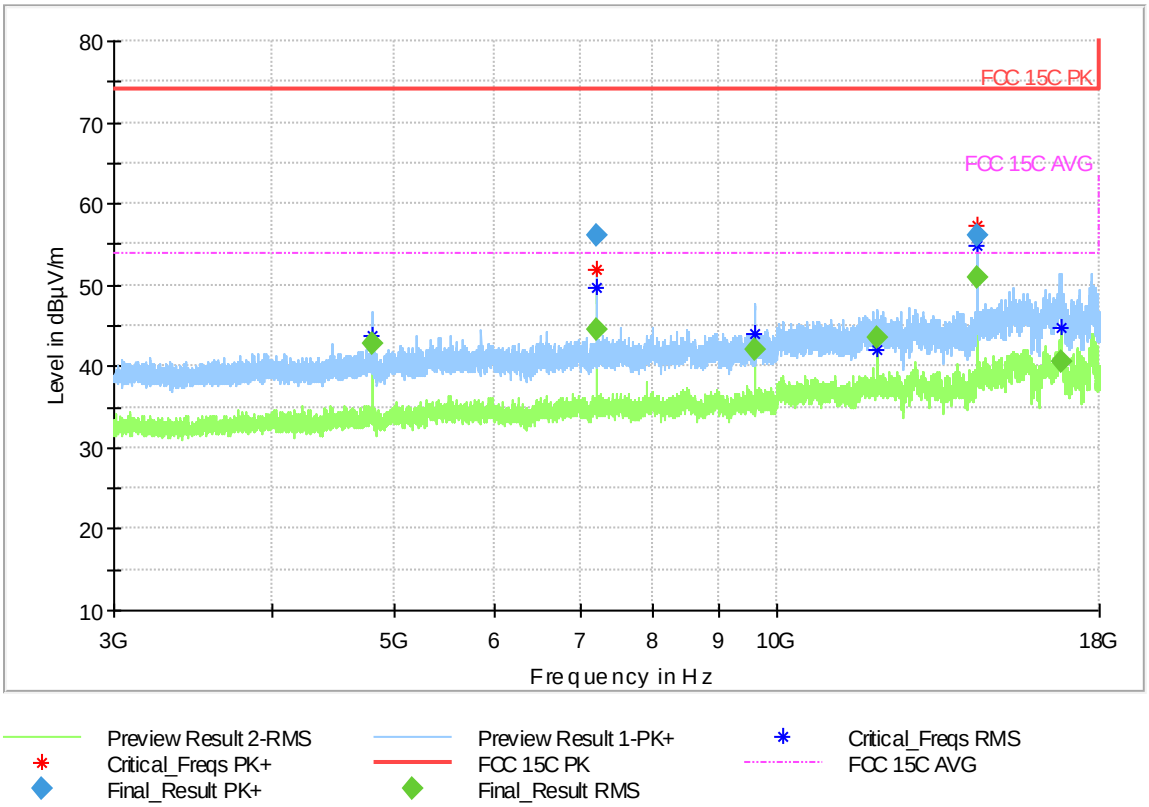


Plot # 3 Radiated Emissions: 3 – 18GHz

Modulation: GFSK | **Channel: 0**

Final_Result

Frequency (MHz)	MaxPeak (dBµV/m)	RMS (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
4803.474	---	42.83	53.98	11.15	200.0	1000.0	292.0	H	149.0	-33	1:46:59 PM - 2/27/2019
7206.397	56.19	---	73.99	17.79	200.0	1000.0	107.0	V	296.0	-30	1:33:24 PM - 2/27/2019
7206.651	---	44.41	53.98	9.57	200.0	1000.0	114.0	H	24.0	-30	1:50:46 PM - 2/27/2019
9607.126	---	42.03	53.98	11.95	200.0	1000.0	226.0	H	45.0	-25	1:40:31 PM - 2/27/2019
12011.095	---	43.55	53.98	10.43	10.0	1000.0	230.0	H	115.0	-22	1:43:49 PM - 2/27/2019
14413.442	---	51.02	53.98	2.96	10.0	1000.0	157.0	V	100.0	-18	1:54:13 PM - 2/27/2019
14413.641	56.13	---	73.98	17.85	10.0	1000.0	142.0	V	99.0	-18	1:30:01 PM - 2/27/2019
16769.599	---	40.56	53.98	13.42	10.0	1000.0	206.0	H	-79.0	-15	1:37:09 PM - 2/27/2019

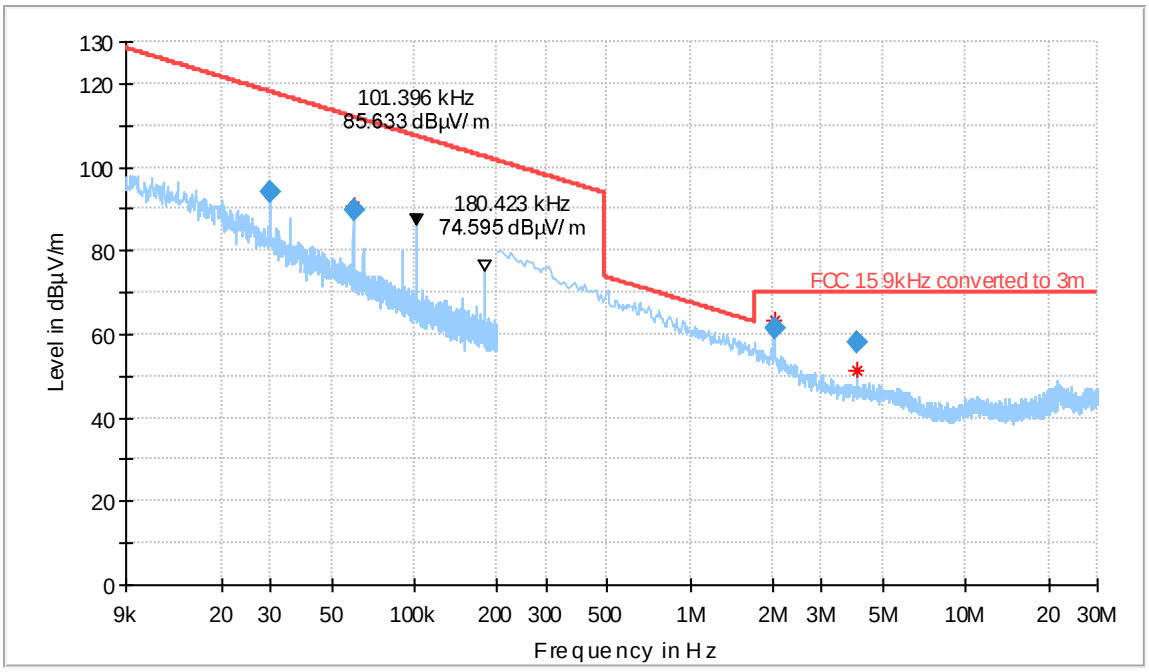


Plot # 4 Radiated Emissions: 9KHz – 30MHz

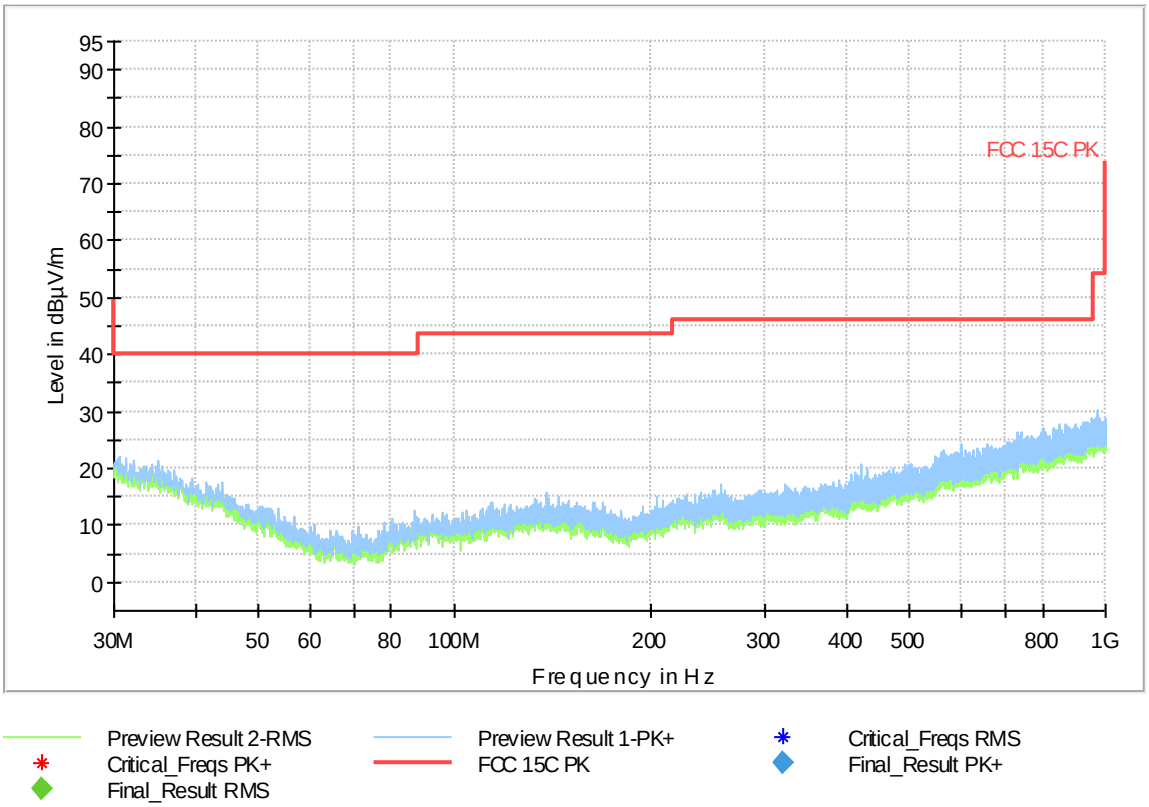
Modulation: GFSK | **Channel: 19**

Final_Result

Frequency (MHz)	MaxPeak (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB)	Comment
0.030	93.79	118.03	24.23	500.0	0.1	100.0	H	-87.0	76	6:40:41 PM - 2/27/2019
0.060	89.88	112.00	22.11	500.0	0.1	100.0	H	-45.0	71	7:04:41 PM - 2/27/2019
2.035	61.26	70.00	8.74	500.0	9.0	164.0	H	-93.0	43	6:43:09 PM - 2/27/2019
4.029	58.11	70.00	11.89	500.0	9.0	107.0	V	-86.0	38	7:01:21 PM - 2/27/2019



Plot # 5 Radiated Emissions: 30MHz – 1GHz	
Modulation: GFSK	**Channel: 19**

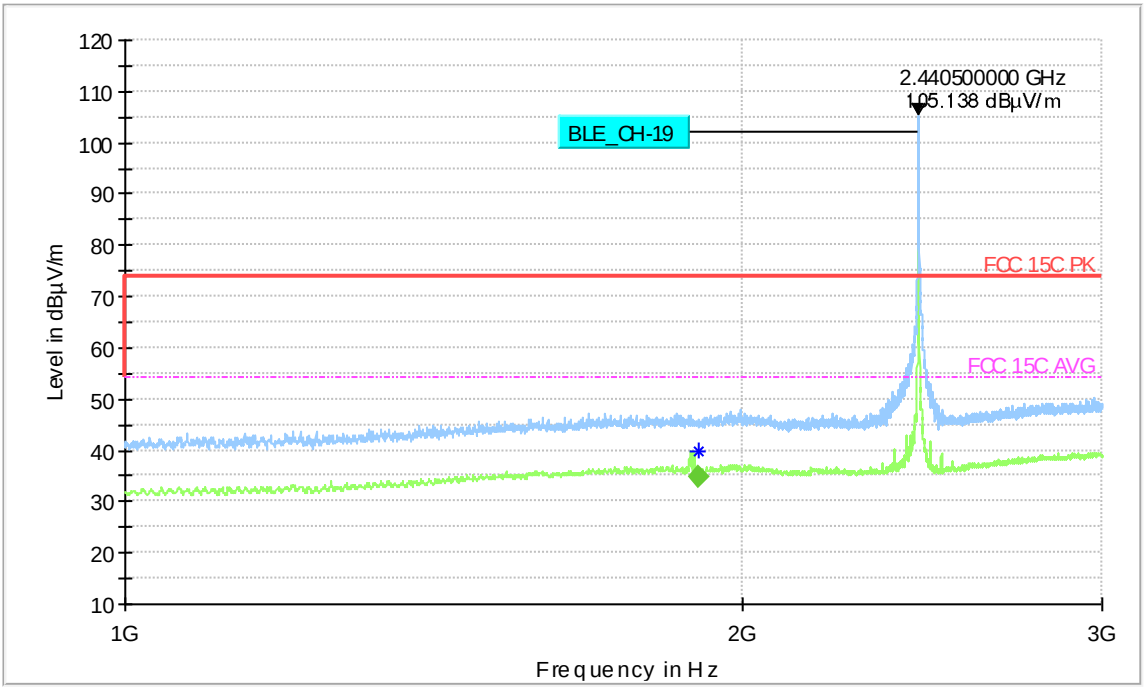


Plot # 6 Radiated Emissions: 1 – 3GHz

Modulation: GFSK | **Channel: 19**

Final_Result

Frequency (MHz)	RMS (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
1903.885	34.85	53.98	19.13	200.0	1000.0	177.0	V	332.0	8	9:35:29 AM - 2/27/2019



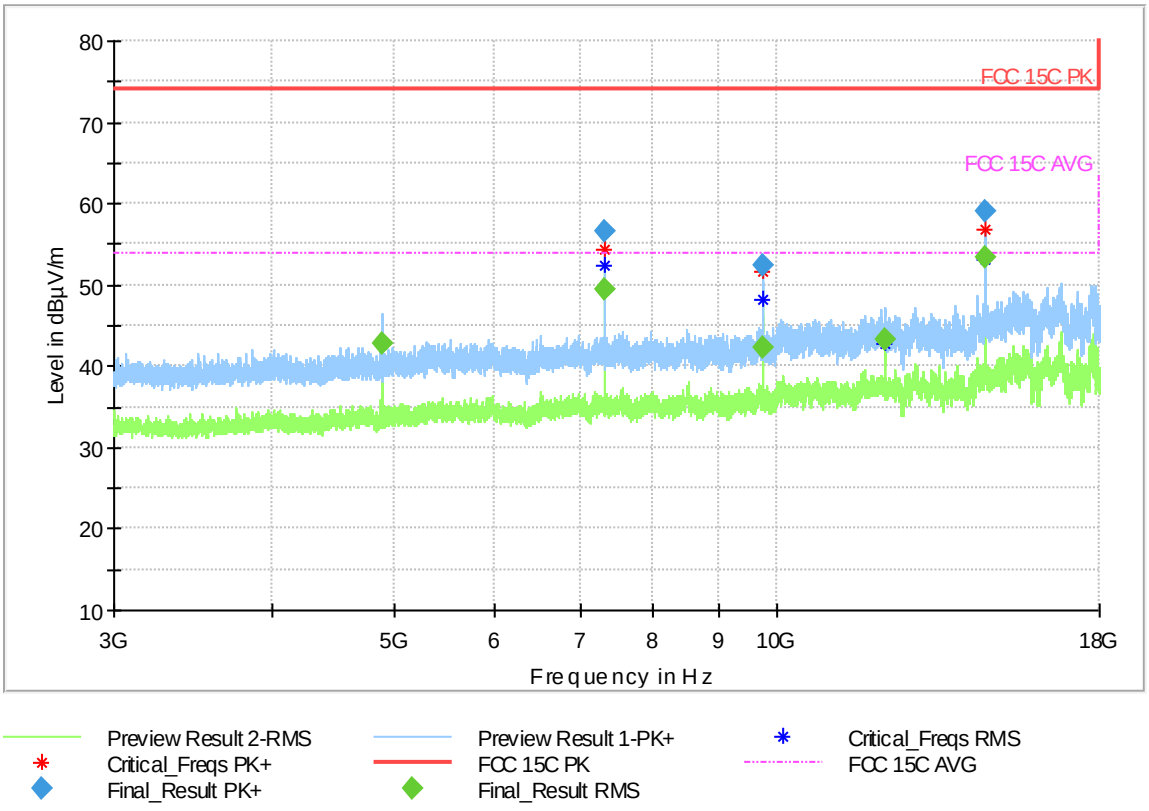
Plot # 7 Radiated Emissions: 3 – 18GHz

Modulation: GFSK | **Channel: 19**

Final_Result

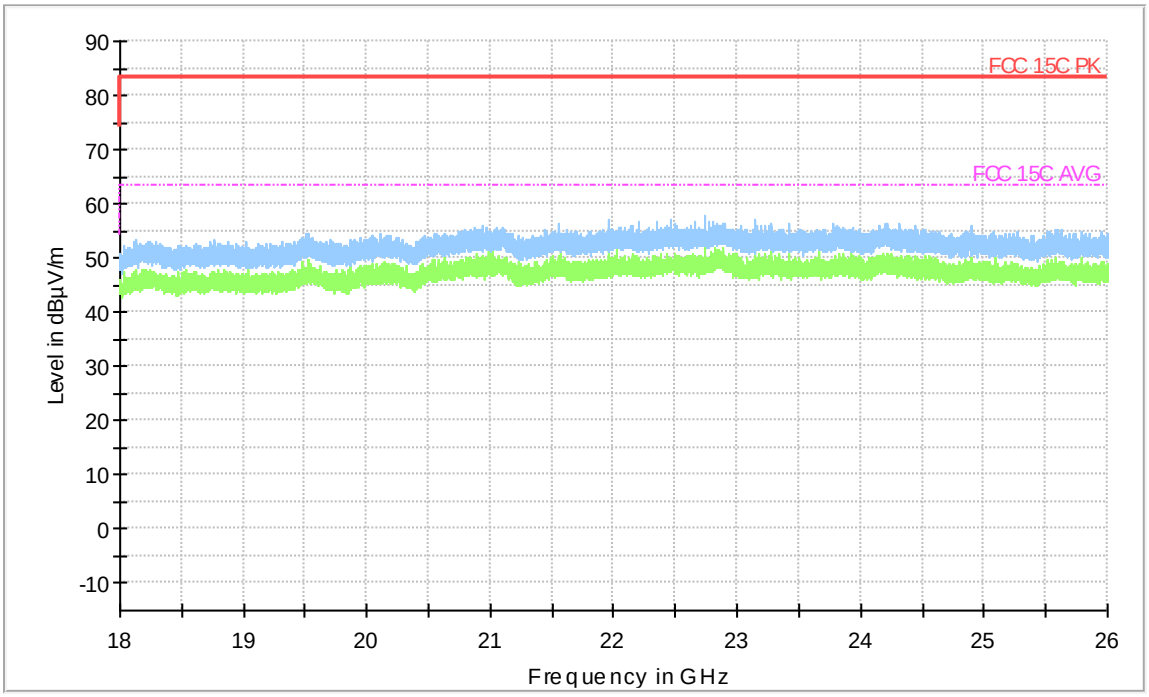
Frequency (MHz)	MaxPeak (dBµV/m)	RMS (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB)	Comment
4880.412	---	42.88	53.98	11.10	200.0	1000.0	300.0	H	146.0	-33	2:20:52 PM - 2/27/2019
7319.146	---	49.38	53.98	4.60	200.0	1000.0	120.0	V	290.0	-30	2:37:37 PM - 2/27/2019
7319.503	56.64	---	73.99	17.35	200.0	1000.0	100.0	V	292.0	-30	2:17:30 PM - 2/27/2019
9758.959	52.35	---	73.98	21.63	200.0	1000.0	210.0	H	228.0	-25	2:07:31 PM - 2/27/2019
9760.998	---	42.40	53.98	11.58	200.0	1000.0	172.0	H	223.0	-25	2:27:36 PM - 2/27/2019
12201.191	---	43.19	53.98	10.79	10.0	1000.0	190.0	H	310.0	-22	2:24:21 PM - 2/27/2019
14638.371	---	53.42	53.98	0.56	10.0	1000.0	166.0	V	138.0	-17	2:31:02 PM - 2/27/2019
14641.510	59.00	---	73.98	14.98	10.0	1000.0	107.0	V	144.0	-17	2:14:02 PM - 2/27/2019

Frequency (MHz)	MaxPeak (dBµV/m)	Corrected MaxPeak (dBµV/m)	Limit (dBµV/m)	Margin (dB)
7319.503	56.64	39.14	53.98	14.84
9758.959	52.35	34.85	53.98	19.13
14641.510	59.00	41.50	53.98	12.48

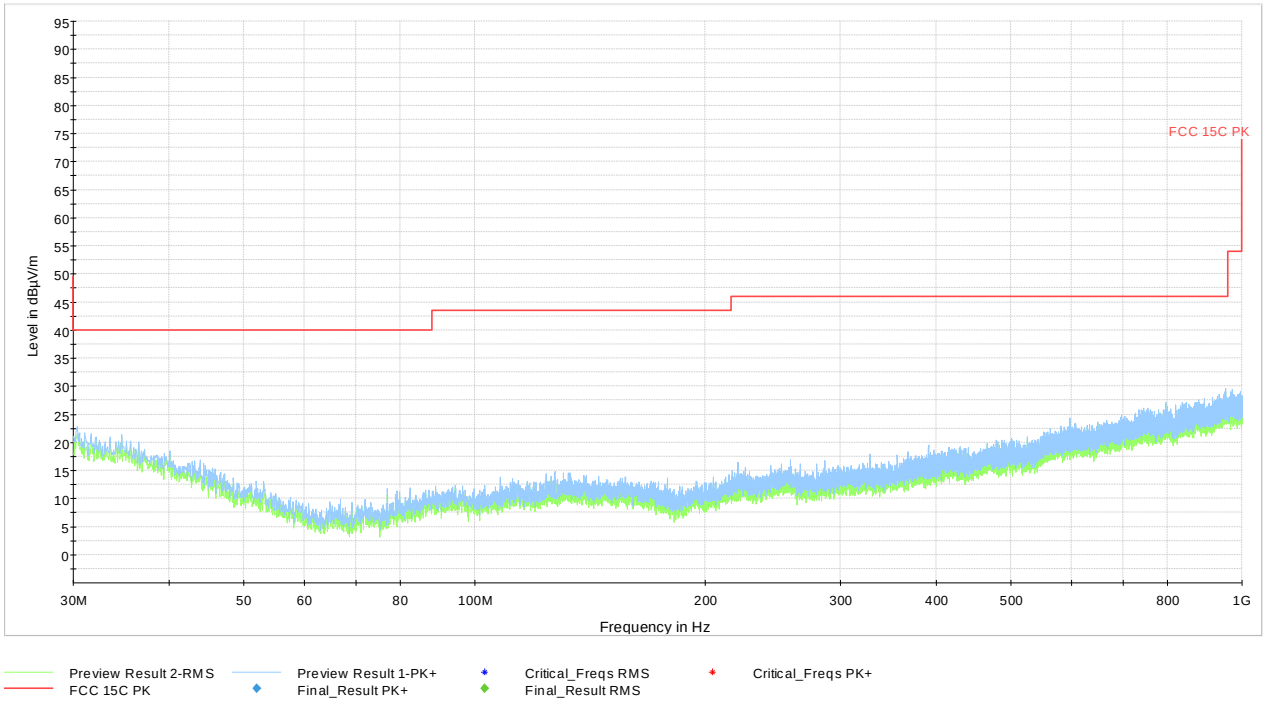


According to the FCC Basics of Unlicensed transmitters and ANSI C63.10 section 7.5;
Determining the duty cycle correction factor (in dB) using 20 * Log10 (Duty cycle %), and apply it to the peak pulse.
20 * Log10 (0.075) = 17.5 dB

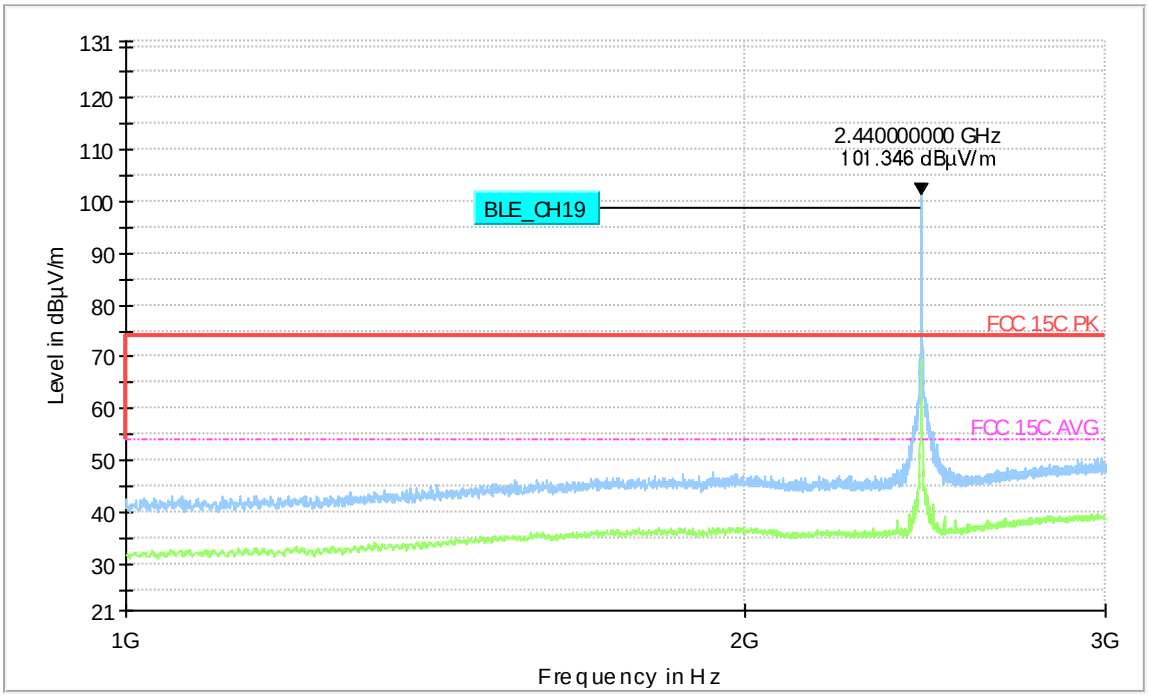
Plot # 8 Radiated Emissions: 18 – 40GHz	
Modulation: GFSK	**Channel: 19**



Plot # 9 Radiated Emissions: 30MHz – 1GHz	
Modulation: GFSK	**Channel: 19**



Plot # 10 Radiated Emissions: 1 – 3GHz	
Modulation: GFSK	**Channel: 19**

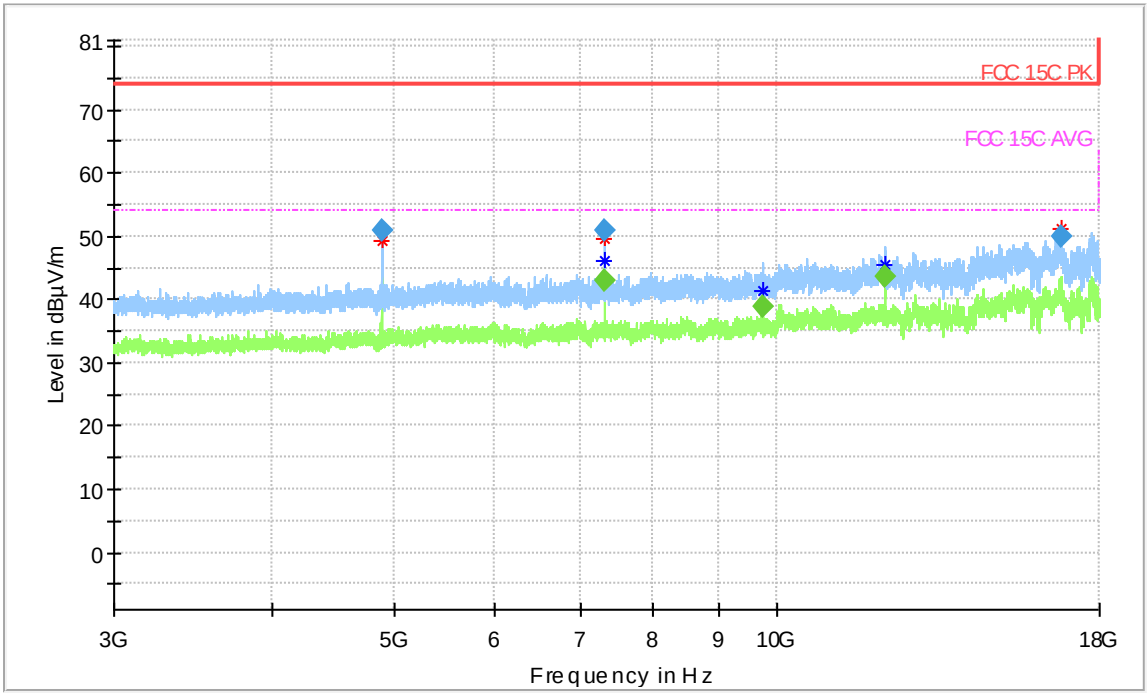


Plot # 11 Radiated Emissions: 3 – 18GHz

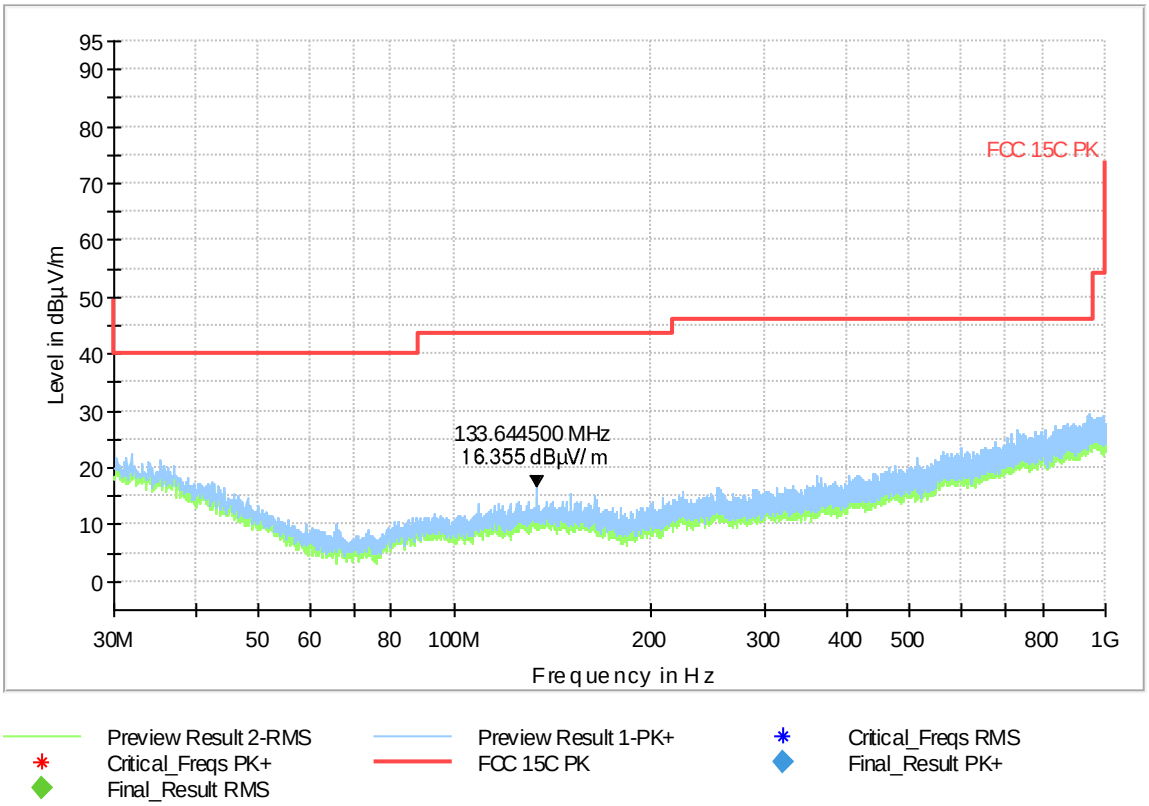
Modulation: GFSK | **Channel: 19**

Final_Result

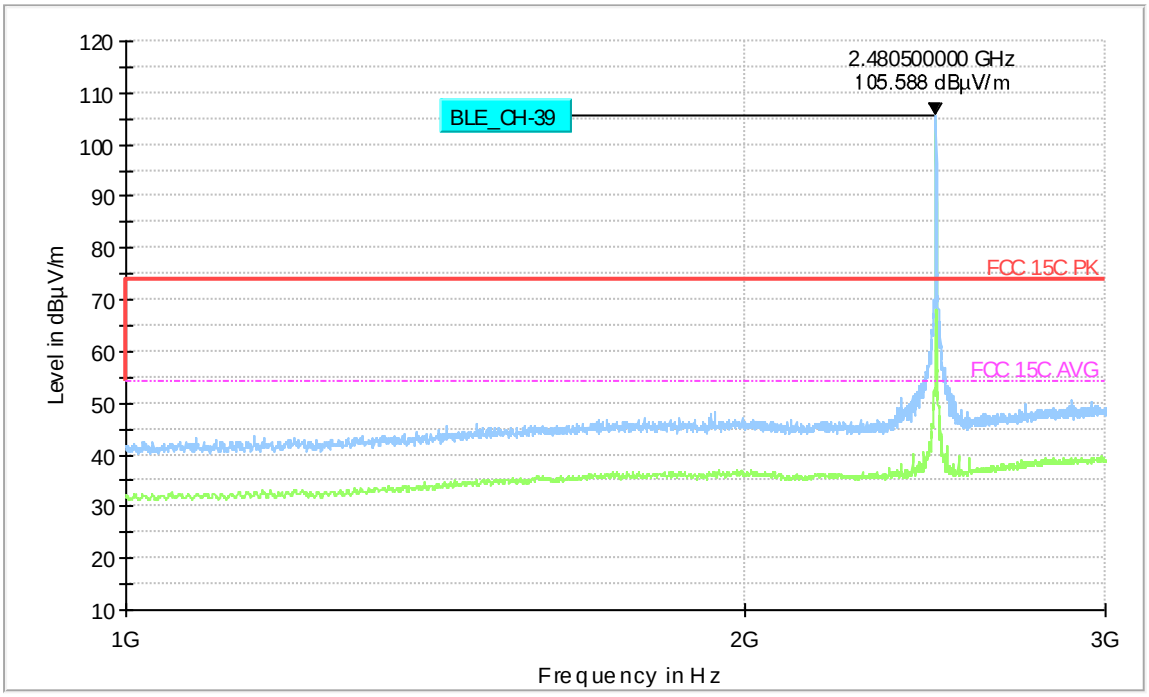
Frequency (MHz)	MaxPeak (dBµV/m)	RMS (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB)	Comment
4879.651	51.05	---	73.99	22.94	200.0	1000.0	223.0	V	318.0	-33	1:03:55 PM - 2/27/2019
7320.699	50.99	---	73.99	23.00	200.0	1000.0	202.0	H	321.0	-30	12:30:53 PM - 2/27/2019
7320.712	---	42.98	53.98	11.00	200.0	1000.0	156.0	H	327.0	-30	12:49:10 PM - 2/27/2019
9758.989	---	38.75	53.98	15.23	200.0	1000.0	124.0	V	60.0	-25	12:52:48 PM - 2/27/2019
12201.201	---	43.59	53.98	10.39	10.0	1000.0	107.0	V	344.0	-22	12:56:16 PM - 2/27/2019
16787.989	49.79	---	73.98	24.19	10.0	1000.0	229.0	V	259.0	-15	1:00:43 PM - 2/27/2019



Plot # 12 Radiated Emissions: 30MHz – 1GHz	
Modulation: GFSK	**Channel:39**



Plot # 13 Radiated Emissions: 1 – 3GHz	
Modulation: GFSK	**Channel: 39**

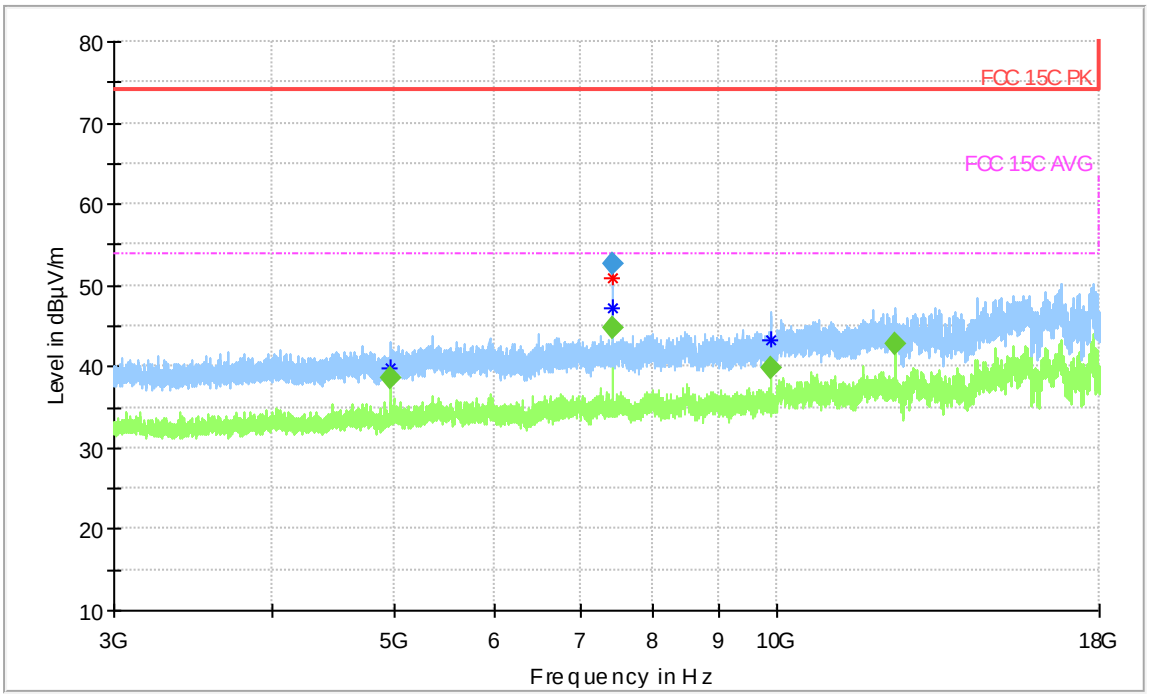


Plot # 14 Radiated Emissions: 3 – 18GHz

Modulation: GFSK | **Channel: 39**

Final_Result

Frequency (MHz)	MaxPeak (dBµV/m)	RMS (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB)	Comment
4959.701	---	38.54	53.98	15.44	200.0	1000.0	100.0	H	46.0	-33	4:21:12 PM - 2/27/2019
7439.374	---	44.70	53.98	9.28	200.0	1000.0	132.0	V	274.0	-29	4:28:09 PM - 2/27/2019
7440.502	52.72	---	73.99	21.27	200.0	1000.0	120.0	V	279.0	-29	4:14:10 PM - 2/27/2019
9919.323	---	39.82	53.98	14.16	200.0	1000.0	107.0	H	-3.0	-24	4:17:54 PM - 2/27/2019
12398.790	---	42.87	53.98	11.11	10.0	1000.0	132.0	H	136.0	-22	4:24:36 PM - 2/27/2019



9 Test setup photos

Setup photos are included in supporting file name: "EMC_COMPO_012_18001_FCC_ISED_Setup_Photos rev3.pdf"

10 Test Equipment And Ancillaries Used For Testing

Equipment Type	Manufacturer	Model	Serial #	Calibration Cycle	Last Calibration Date
PASSIVE LOOP	ETS.LINDGREN	6512	00164698	3 YEARS	08/08/2017
BILOG ANTENNA	TESEO	CBL 6141B	41106	3 YEARS	11/01/2017
HORN ANTENNA	ETS.LINDGREN	3115	00035114	3 YEARS	07/31/2017
HORN ANTENNA	ETS.LINDGREN	3117	0167061	3 YEARS	08/08/2017
HORN ANTENNA	ETS.LINDGREN	3116C	00166821	3 YEARS	09/24/2017
SIGNAL ANALYZER	R&S	FSU26	200065	2 YEARS	07/03/2017
SIGNAL ANALAYZER	R&S	FSV 40	101022	3 YEARS	07/05/2017
COMPACT DIGITAL BAROMETER	CONTROL COMPANY	35519-055	91119547	2 YEARS	06/20/2017
THRMOMETER HUMIDIY	DICKSON	TM320	16253639	3 YEARS	11/02/2017

Note: Equipment used meets the measurement uncertainty requirements as required per applicable standards for 95% confidence levels. Calibration due dates, unless defined specifically, falls on the last day of the month. Items indicated "N/A" for cal status either do not specifically require calibration or is internally characterized before use.

11 Revision History

Date	Report Name	Changes to report	Report prepared by
03/11/2019	EMC_COMPO_012_18001_FCC_15.247_ISED_BLE_DTS	Initial Version	Issa Ghanma
03/21/2019	EMC_COMPO_012_18001_FCC_15.247_ISED_BLE_DTS_rev1	FCC ID correction	Issa Ghanma
03/26/2019	EMC_COMPO_012_18001_FCC_15.247_ISED_BLE_DTS_rev2	Correction: Section 3.1 • Replace Module name with **Chipset manufacturer number**. • Replace BLUENRG-2323 with **BLUENRG-232**	Issa Ghanma
05/17/2019	EMC_COMPO_012_18001_FCC_15.247_ISED_BLE_DTS_rev3	Correction: Section 4, 7, 8 • 558074 D01 DTS Meas Guidance version number. Apply duty cycle correction factor to plot #7	Issa Ghanma