

Lab Code:200101-0

## Electromagnetic Emission Compliance Test Report



Equipment Under Test (EUT)	Radar Ballast Inspection Tool	
Model	RABIT1	
Applicant	Earth Science Systems, LLC	
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	March 26, 2020	
AC Lab Report Number	0048-200316-01	
NVLAD	The test result in this rep covered by the NVLAP ac	

## **Table of Contents**

Section 1.	Summary of Test Results	3
Section 2.	General Equipment & Test Configuration	6
Section 3.	Test Methodology & Facilities	8
Section 4.	Measurement Data	9
Section 5.	FCC ID Labeling	5
Section 6.	Setup Photos	6
Section 7.	EUT Photos	9

#### Section 1. Summary of Test Results

Manufacturer:	Earth Science Systems, LLC
Product Name:	Radar Ballast Inspection Tool

Model/Parts No. : RABIT1 S/N: GPR 40003

#### 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

e  $\square$  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"

# **NVLAD**

#### NVLAP LAB CODE: 200101-0

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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 <sub>M</sub>	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 &RSS-GEN 7.1.4	12	N/A
Radio Frequency Exposure	FCC OET Bulletin 65 &RSS-GEN&RSS-102	13	Complies
Conducted Emissions	15.207 &RSS-GEN	14	*
Transmission Duration	15.509(c)	15	**

\* NOT APPLICABLE to the EUT as it is a battery-powered device; \*\* NOT APPLICABLE to the EUT as it is not a handheld device.

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	

Wei Li Lab Manager Advanced Compliance Lab

Date: March 26, 2020

## Section 2. General Equipment & Test Configuration

## 2.1. EUT Specification

EUT	Radar Ballast Inspection Tool, Model No. RABIT1 manufactured by Earth Science Systems, LLC. This scanner is an impulse radar system intended to be used in utility detection and geophysical surveying.			
Supply Voltage	12 VDC, provided by LiFePO4 Rechargeable Battery			
Operating Frequency	288.0 MHz – 1162 MHz			
-10dB UWB Bandwidth	874 MHz			
Modulation Type	Up to 1MHz Pulse Repetition Frequency (PRF)			
Peak Emissions in a 50 MHz Bandwidth	N/A. Max. peak emissions is under 1GHz			
Antenna	Dipole Antenna			
Hardware Version	Firmware version 5232NA			
Software Version	EssGpr4LoggingApp, version 0.0.74.			

## 2.2. Description of Operation

The system performs time domain reflectometry by radiating a radio frequency impulse with a repetition frequency of up to 1MHz 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 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.

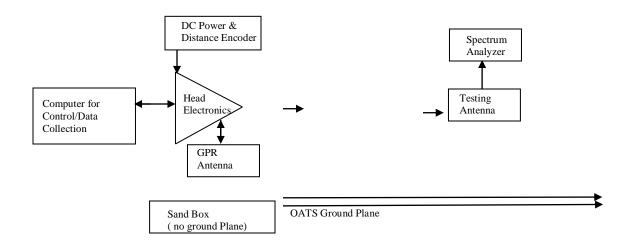
## 2.3. System Diagram

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:

- RF Clock(s) : 250MHz
- RF antenna center frequencies: 500MHz

## 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" and accepted for wireless testing. 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

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

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

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

#### Section 4. Measurement Data

Test No.1

Name of Test:	Cross Reference	Test Standard:	15.505 &RSS-GEN	
Tested By:	WEI LI	Test Date:	03/16/2020-03/26/2020	

#### **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.

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** 

Project Number:	0048-200316-01	
EUT:	RABIT1	
S/N:	GPR 40003	
Tested By:	David Tu	
Temperature:	65°F	
Humidity:	30%	

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)	SA* Reading (dBuV/m)	Refer to Part 15.109 3m Limit (dBuV/m)	Margin (dB)	Result
49.6	Н	1.8	37.5*	49.1	-11.6	Pass
66.6	Н	1.8	34.2	49.1	-14.9	Pass
96.3	Н	1.8	32.5	53.1	-20.6	Pass
158.8	Н	1.8	38.6	53.1	-14.5	Pass
161.3	Н	1.8	38.6	53.1	-14.5	Pass
169.4	Н	1.8	39.0	53.1	-14.1	Pass
340	Н	1.0	39.8	56.1	-16.3	Pass
430	Н	1.0	40.7	56.1	-15.4	Pass
480	Н	1.0	46.3	56.1	-9.8	Pass
650	Н	1.0	40.3	56.1	-15.8	Pass
670	Н	1.0	42.1	56.1	-14.0	Pass
1200	Н	1.1	34.2*	59.1	-24.9	Pass
1280	Н	1.1	52.3	59.1	-6.8	Pass
1375	Н	1.1	51.3	59.1	-7.8	Pass
1732	Н	1.1	49.8	59.1	-9.3	Pass
55.5	V	1.1	34.1	49.1	-15.0	Pass
85.3	V	1.1	34.7	49.1	-14.4	Pass
112.5	V	1.1	34.6	53.1	-18.5	Pass
121.4	V	1.1	36.1	53.1	-17.0	Pass
135.8	V	1.1	37.2	53.1	-15.9	Pass
430	V	1.1	40.4	56.1	-15.5	Pass
480	V	1.1	47.0*	56.1	-9.1	Pass
650	V	1.1	39.7	56.1	16.4	Pass

860	V	1.1	42.1	56.1	-14.0	Pass
890	V	1.1	43.2	56.1	-12.9	Pass
960	V	1.1	41.3*	56.1	-14.8	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.

Test	No.2
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Name of Test:	Marketing of UWB Equipment	Test Standard:	15.507 &RSS-GEN
Tested By:	WEI LI	Test Date:	03/16/2020-03/26/2020

- Standard: The responsible party is properly informed about the responsible for 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)
- Method of In some cases, the operation of UWB devices is limited to specific **Measurement:** 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:

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:	03/16/2020-03/26/2020	

	Definition: Pulse Repetition Frequency (PRF) is the trigger repetition frequency.
	PRF declared by applicant: up to 1MHz
Method of Measurement:	Tested at 3-meter OATS per ANSI C63.4 Spectrum Analyzer Settings: RBW: 30KHz VBW: ≥RBW Detector: Peak Span: As required Sweep: Auto

**Test Result:** 

Complies

**Test Data:** 

PRF <=1MHz

Test N	No.4
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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:	03/16/2020-03/26/2020

MinimumDefinition:Standard:The bandwidth of a UWB emission is defined by the points on the<br/>emission spectrum where the amplitude is 10 dB below the maximum<br/>emission amplitude (i.e., the -10 dB points), as based on the complete<br/>transmission system including the antenna. The upper boundary is<br/>designated  $f_H$  and the lower boundary is designated  $f_L$ . The frequency<br/>at which the highest radiated emission occurs is designated  $f_M$ . The<br/>center frequency  $f_C$ , equals  $(f_H + f_L) / 2$ . The fractional bandwidth<br/>equals  $2 * (f_H - f_L) / (f_H + f_L)$ .<br/>In cases where the measured emission spectrum contains multiple<br/>(more than two) -10 dB points, the outermost points define the<br/>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.

Method of Measurement:	Tested at 3-meter OATS per ANSI C63.4 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.
	<ul> <li>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.</li> <li>4) The UWB bandwidth is the different of the upper and lower frequency recorded.</li> </ul>

Test Result: Complies

Test Data: Data and Plots

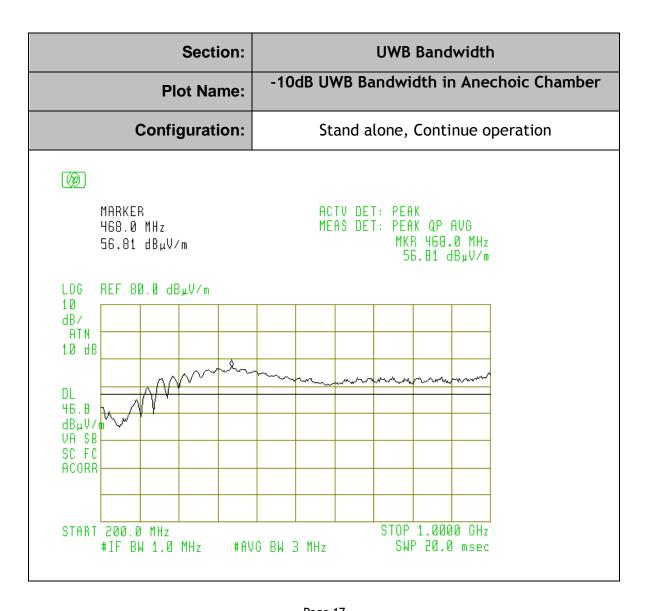
Measurement Data (Values in MHz):

f <sub>M</sub>	The highest emission peak	468.0
f∟	10 dB below the highest peak	288.7
f <sub>H</sub>	10 dB above the highest peak	1162
f <sub>C</sub>	Calculated: $(f_H + f_L)/2$	725.4
Bandwidth	Calculated: (f <sub>H</sub> - f <sub>L</sub> )	873.3
Fractional BW	Calculated: $2^{(f_H - f_L)/(f_H + f_L)}$	1.204

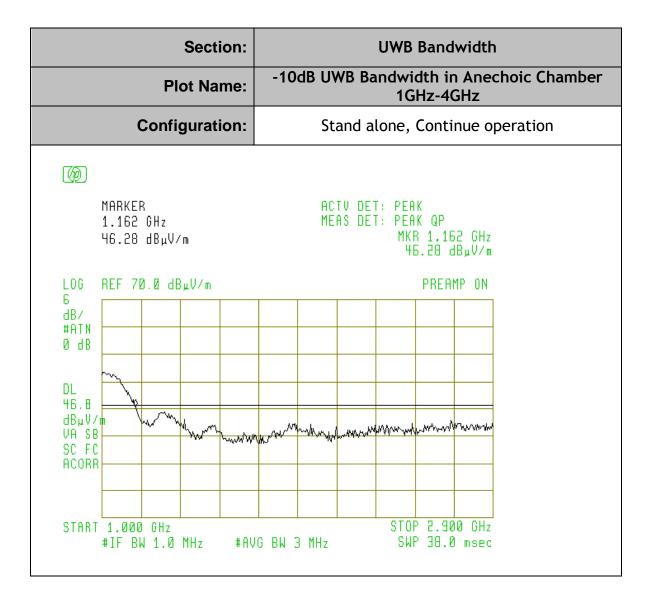
Note: The Fraction Bandwidth is greater than 0.2.

Measurement Plots:

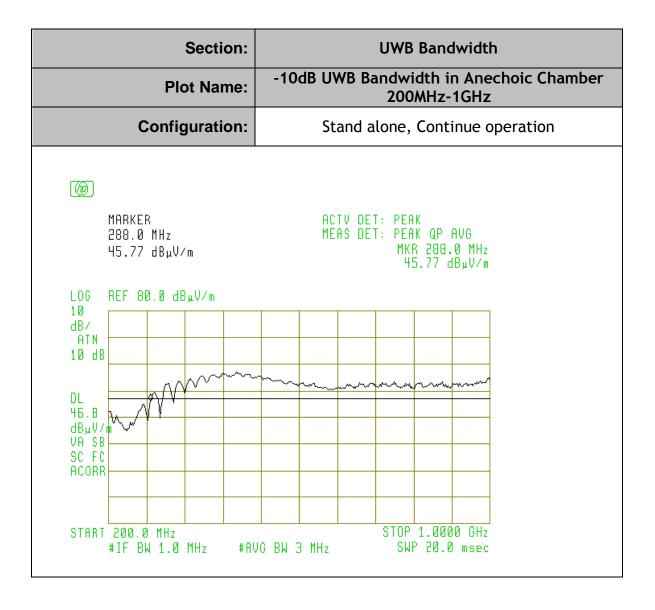
Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%



Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%



Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%



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:	03/16/2020-03/26/2020

Minimum	15.509(b) &RSS-220 6
	Operation under the provisions of this section is limited to GPRs and wall 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).

**Test Result:** 

Complies

**Test Data:** 

NA

Test No.6

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:	03/16/2020-03/26/2020

## 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

	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
	Sweep. Auto
	Test Procedure:
	1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane ( $0^{\circ}$ 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
	<ul><li>were noted.</li><li>6) It is recommended to demodulate the received signals for suitable</li></ul>
	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.
	<ul> <li>9) The EUT was rotating from 0° to 360° degrees with 45° step increment</li> </ul>
	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:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	David Tu
Temperature:	65°F
Humidity:	30%

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
47.9	Н	38.8*	1.4	180	40.0	-1.2	
92.1	Н	36.4	1.4	180	43.5	-7.1	Pass
129.5	Н	38.7	1.4	135	43.5	-4.8	Pass
145.6	Н	39.1*	1.3	135	43.5	-4.4	Pass
169.8	Н	37.8*	1.1	180	43.5	-5.7	Pass
191.5	Н	39.2	1.0	180	43.5	-4.3	Pass
200	Н	37.4	1.0	135	43.5	-6.1	Pass
482	Н	43.9*	1.0	135	46.0	-2.1	Pass
574	Н	41.1	1.0	180	46.0	-4.9	Pass
674	Н	40.1*	1.0	180	46.0	-5.9	Pass
760	Н	42.4	1.0	180	46.0	-3.6	Pass
880	Н	43.3	1.0	135	46.0	-2.7	Pass
41.9	V	38.9*	1.2	330	40.0	-1.1	Pass
85.7	V	36.8*	1.2	330	40.0	-3.2	Pass
106.9	V	38.4	1.1	270	43.5	-5.1	Pass
127.3	V	39.2*	1.2	270	43.5	-4.3	Pass
150.3	V	39.4*	1.1	330	43.5	-4.1	Pass
197.0	V	38.8	1.1	270	43.5	-4.7	Pass

200	V	36.5	1.1	000	43.5	-7	Pass
460	V	41.1	1.1	000	46.0	-4.9	Pass
482	V	44.7*	1.1	270	46.0	-1.3	
820	V	40.8	1.1	270	46.0	-5.2	Pass
840	V	41.5	1.1	000	46.0	-4.5	Pass
962	V	38.0*	1.1	090	46.0	-8	Pass

\*Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15 B) excluded. \*\*Quasi-Peak Readings marked with \*, if any.

#### 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:	03/16/2020-03/26/2020

## 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).

Method of Measurement:	Tested at 3-meter OATS per ANSI C63.4 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 ( $0^{\circ}$ 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 $-10^{\circ}$ to find the highest emission.
	<ul> <li>3) The receiving antenna was positioned in horizontal polarization.</li> <li>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.</li> <li>5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.</li> </ul>
	<ul><li>6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.</li><li>7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.</li></ul>
	<ul><li>8) The receiving antenna was positioned in vertical polarization and the steps</li><li>2 to 6 were repeated.</li></ul>
	9) The EUT was rotating from $0^{\circ}$ to $360^{\circ}$ degrees with $45^{\circ}$ 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:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	David Tu
Temperature:	65°F
Humidity:	30%

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: 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
1044	Н	38.1	1.0	180	39.4	-1.3	Pass
1100	Н	38.3	1.0	180	39.4	-1.1	Pass
1416	Н	37.2	1.0	000	39.4	-2.2	Pass
1536	Н	38.0	1.0	000	39.4	-1.4	Pass
1628	Н	37.3	1.0	000	39.4	-2.1	Pass
1036	V	37.9	1.0	315	39.4	-1.5	Pass
1096	V	38.2	1.0	315	39.4	-1.2	Pass
1268	V	36.9	1.0	315	39.4	-2.5	Pass
1524	V	36.5	1.0	270	39.4	-2.9	Pass
2896	V	35.2	1.0	270	39.4	-4.2	Pass

#### NOTE:

\* Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15B) are excluded.

\*\*SA (Spectrum Analyzer) Reading Setup: Average Reading for above 960MHz; 1m/3m distance factor applied if needed.

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:	03/16/2020- 03/26/2020

## Minimum Definition:

**Standard:** 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 meter (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).

Tested at 3-meter OATS per ANSI C63.4 Spectrum Analyzer Settings: RBW: 1KHz VBW: >3xRBW Detector: RMS Average Detector Span: As required Sweep: Auto
Test Procedure:
<ol> <li>The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)</li> <li>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.</li> <li>The receiving antenna was positioned in horizontal polarization.</li> <li>The measurements were made with the detector set to RMS during monitoring the frequency range above 960 MHz.</li> <li>Upon detection of a suspect emission signal, its amplitude and frequency were noted.</li> <li>It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.</li> <li>At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.</li> <li>The receiving antenna was positioned in vertical polarization and the steps 2 to 6 were repeated.</li> <li>The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.</li> <li>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.</li> </ol>

**Test Result:** 

Complies

Test Data:

**Data and Plot** 

Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
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:

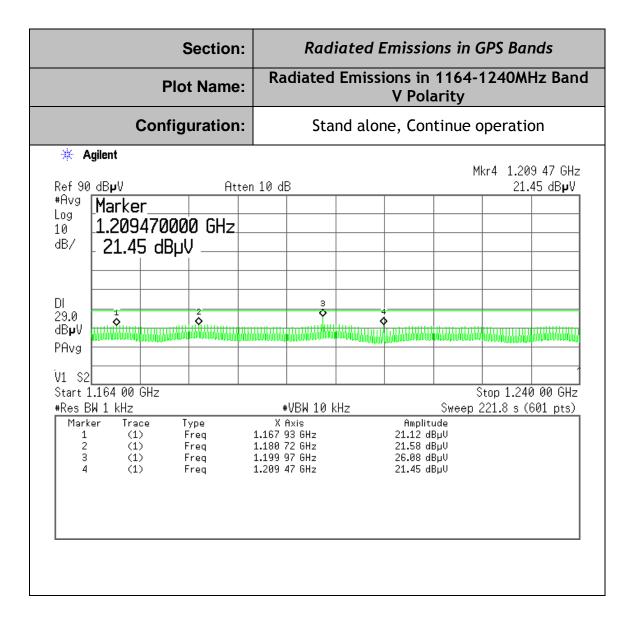
Freq. (MHz)	H,V	SA Reading (dBuV/m)	Height (m)	Angle (degree)	1m Limit (dBuV/m)	Margin (dB)	Result
1169.5	Н	21.0	1.0	180	29.4	-8.4	Pass
1179.7	Н	20.6	1.0	180	29.4	-8.8	Pass
1192.9	Н	20.7	1.0	135	29.4	-8.7	Pass
1204.5	Н	20.5	1.0	135	29.4	-8.9	Pass
1561.0	Н	18.6	1.0	180	29.4	-10.8	Pass
1569.8	Н	17.6	1.0	135	29.4	-11.8	Pass
1584.0	Н	18.8	1.0	135	29.4	-10.6	Pass
1602.5	Н	18.5	1.0	180	29.4	-10.9	Pass
1167.9	V	21.1	1.0	270	29.4	-8.3	Pass
1180.7	V	21.6	1.0	270	29.4	-7.8	Pass
1200.0	V	26.1	1.0	000	29.4	-3.3	Pass
1209.5	V	21.5	1.0	330	29.4	-7.9	Pass
1564.5	V	22.9	1.0	330	29.4	-6.5	Pass
1569.8	V	23.0	1.0	330	29.4	-6.4	Pass
1584.0	V	22.8	1.0	270	29.4	-6.6	Pass
1590.4	V	23.0	1.0	270	29.4	-6.4	Pass

There were no significant broadband emissions related to the UWB transmitter. Most measured signals were narrowband and related to the microprocessor / clocks and do not fall under the requirements of this section.

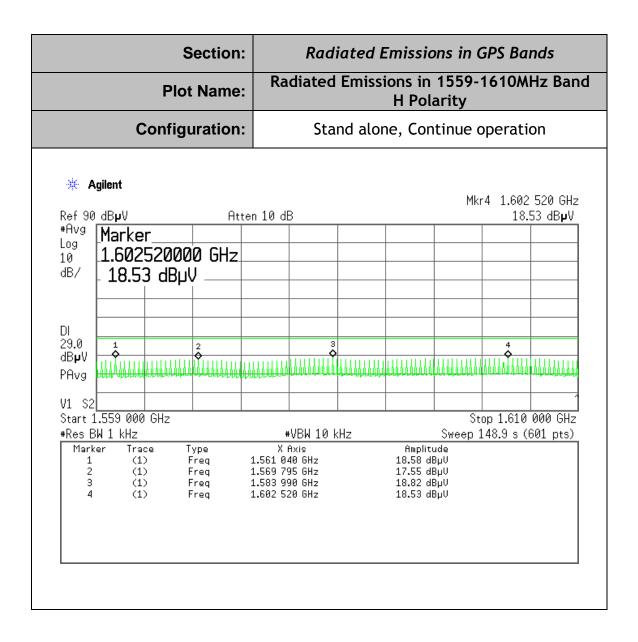
Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%

Section:	Radiated Emissions in GPS Bands		
Plot Name:	Radiated Emissions in 1164-1240MHz Band H Polarity		
Configuration:	Stand alone, Continue operation		
	Mkr4 1.204 53 GHz en 10 dB 20.51 dBµV		
<sup>*Avg</sup> Marker 10 1.204530000 GHz dB/ 20.51 dBµV			
DI 29.0 dBµV PAvg			
V1 S2			
Start 1.164 00 GHz #Res BW 1 kHz	Stop 1.240 00 GHz #VBW 10 kHz Sweep 221.8 s (601 pts)		
Marker Trace Type 1 (1) Freq 2 (1) Freq 3 (1) Freq 4 (1) Freq	X Axis Amplitude 1.169 45 GHz 21.00 dBμU 1.179 71 GHz 20.64 dBμU 1.192 88 GHz 20.66 dBμU 1.204 53 GHz 20.51 dBμU		

Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%

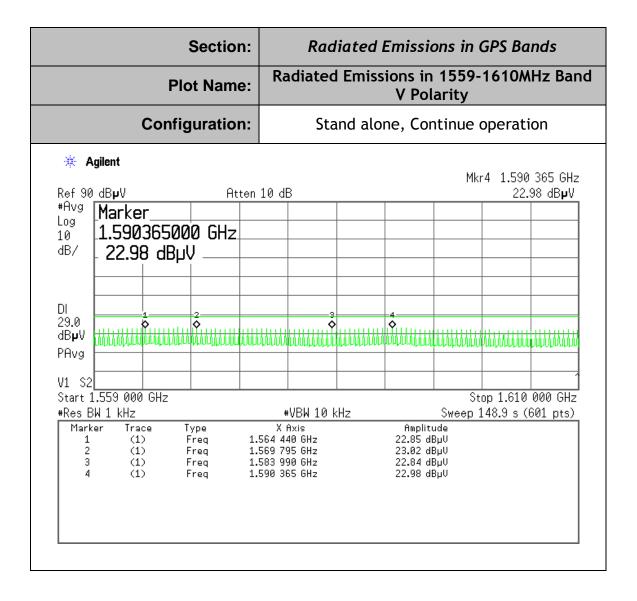


Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%



Page 33

Project Number:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	Wei Li
Temperature:	65°F
Humidity:	30%



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:	03/16/2020-03/26/2020

#### **Minimum** Definition:

Standard: For UWB devices where the frequency at which the highest radiated emission occurs, f<sub>M</sub>, 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)	Field strength limit @ 3 meters (measured with 1 MHz RBW) (dBµV/m)
0	95.2	61.23

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 1 MHz resolution bandwidth the applicable limit is adjusted with a  $20\log(1/50)$  dB factor.

 $20 \log (1/50) dBm = -33.97 dBm$ . -33.97 dBm = 61.23 dBuV/m.

Method ofTested at 3-meter OATS per ANSI C63.4Measurement:Spectrum Analyzer Settings:<br/>RBW: 1MHz<br/>VBW: ≥3x RBW<br/>Detector: Peak<br/>Span: As required<br/>Sweep: Auto

Test Procedure:

1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane ( $0^{\circ}$  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 1 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  $0^{\circ}$  to  $360^{\circ}$  degrees with  $45^{\circ}$  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:	0048-200316-01
EUT:	RABIT1
S/N:	GPR 40003
Tested By:	David Tu
Temperature:	65°F
Humidity:	30%

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	Peak Reading (or corrected) for 3 meter	Limit (dBuV/m)	Margin (dB)	Result
1036*	V	49.30	1MHz	38.70	61.23	-22.53	Pass
482**	V		1MHz	56.80	N/A		

\* measured at 1m due to low signal level

\*\* max. emission @3m, but under 1GHz.

Test	No.	10
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Test No.10					
Name of Test:	Technical Requirements Applicable to ALL UWB Devices	Test Standard:	15.521		
Tested By:	WEI LI	Test Date:	03/16/2020-03/26/2020		
<b>Requirement</b>	<b>Description</b>				
15.521(a)	The EUT is not employed onboard an aircraft, ship a		of toys, operation		
15.521(b)	Permanent attached antenna mo		1 1 1		
15.521(c)	The Digital circuitry portion verified to comply with 47				
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 onboard an aircraft, ship a	-	of toys, operation		

**Test Result:** 

Complies

**Test Data:** 

Test No.11			
Name of Test:	Coordination Requirement	Test Standard:	15.525
Tested By:	Wei Li	Test Date:	03/16/2020-03/26/2020

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)

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:

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Test No. 12			
Name of Test:	Antenna Requirement	Test Standard:	15.203 &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:** 

Test Data:

Test No.13			
Name of Test:	Radio Frequency Exposure	Test Standard:	FCC OET Bulletin 65 &RSS-GEN& RSS-102
Tested By:	WEI LI	Test Date:	03/16/2020-03/26/2020

**Minimum** For FCC, per Public Exposure to Radio Frequency Energy Levels **Standard:** (1.1307 (b)(1)) Limits:

From 1.1310 Table 1 (B), for Public S = 1.0 mW/cm<sup>2</sup>; for Professional, S = 5.0 mW/cm<sup>2</sup>.

*For IC*: per RSS-102, Sec. 2.5.2, Exemption Limits for Routine Evaluation, with formula of  $1.31 \times 10^{-2} f^{0.6834}$  W, more restricted EIRP limit value are 1.37W at 902MHz, 2.67W at 2400MHz,4.52W at 5180MHz.

Method of Measurement:		Equation (1) Equation (2)
wieusur ement.	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 distance.	the MPE

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

**Test Result:** 

**Complied with MPE limit** 

**Test Data:** 

#### **Calculation:**

A. For FCC MPE compliance:

1) For GPR alone, max emission level is under the limit set in Section 15.209. No RF hazard need to be concerned.

2) With co-location of GPR and pre-certified RF module, the following calculation shows total RF exposure is still under the MPE limit:

For GPR Tx, max. level measured at 3m distance: 56.8 dB $\mu$ V/m, i.e. P+G= -38.4dBm

Plug all three items into equation (2), yielding,

Power Density Limit (mW/cm <sup>2</sup> )	Output Power (dBm)	Antenna] Gain (dBi)	Power Density at 20cm (mW/ cm <sup>2)</sup>	Max. EIRP (W)
1.0			2.8E-8	1.5E-7

For RF module, made by Texas Instruments Inc., WiFi and BT Module, Model # WL18MODGI. (FCC ID: Z64-WL18DBMOD, IC: 451I-WL18DBMOD). Worst case MPE per report #FA4O0971:

Power Density Limit (mW/cm <sup>2</sup> )	Output Power (dBm)	Antenna] Gain (dBi)	Power Density at 20cm (mW/ cm <sup>2)</sup>	Max. EIRP (W)
1.0	19.5	4.5	0.050	0.251

Thus, co-location calculations:

 $\Sigma$ MPE = 2.8E-8 *mW/cm*<sup>2</sup>+ 0.251 *mW/cm*<sup>2</sup> = 0.251 *mW/cm*<sup>2</sup> which is less than the limit 1.0 *mW/cm*<sup>2</sup>

Additionally,  $\Sigma \text{ SeqnSlimn} = \text{Seq1Slim1} + \text{ Seq2Slim2} \le 1$ Herein  $\Sigma \text{SeqnSlimn} = 2.8\text{E} \cdot 8/1.0 + 0.251/1.0 = 0.251 \le 1$ 

B. For IC ISED MPE compliance:

GPR max. EIRP =1.5E-7W and RF module EIRP= 0.251W. Thus co-location max. EIRP=0.251W < limit 1.37W /2.67W /4.52W.

NOTE: For mobile or fixed location transmitters, the minimum separation distance between the antenna & radiating structures of the device and nearby persons is 20 cm, even if calculations indicate that the MPE distance would be less. . . . . . .

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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	e logarithm of the freq	uency.	

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

**Test Data:** 

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Test No.15			
Name of Test:	Transmission Duration	Test Standard:	15.509(c)
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.

Method of NA Measurement:

<b>Fest Result:</b>	NA

**Test Data:**