

Class II Permissive Change TEST REPORT

Report Number: 105041185MPK-001 Project Number: G105041185 Original Issued Date: June 10, 2022 Report Revision Date: April 03, 2023

Testing performed on Real Immersive System Model: Xavier 1/Xavier 2 Part Number: 19135 (HMD, All-In-One Head Mounted Display)

> FCC ID: 2AQU7-REAL02 IC: 24199-REAL02

to

FCC Part 15 Subpart C (15.247) Industry Canada RSS-247 Issue 2

CAB identifier: 2042L

For

Penumbra Inc.

Test Performed by: Intertek 1365 Adams Court Menlo Park, CA 94025 USA

Minh Ly

Test Authorized by: Penumbra Inc. One Penumbra Place Alameda, CA 94502 USA

Prepared by: **Date:** April 03, 2023

Reviewed by: **Date:** April 03, 2023

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EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 1 of 83



Report No. 105041185MPK-001				
Equipment Under Test:	Real Immersive System - All-In-One Head Mounted Display			
Trade Name:	Penumbra Inc.			
Model Number:	Xavier 1/Xavier 2			
Part Number:	19135			
Applicant:	Penumbra Inc.			
Contact:	Puneet Goyal			
Address:	Penumbra Inc. One Penumbra Place Alameda, CA 94502			
Country:	USA			
Tel. Number:	(510) 440-5598			
Email:	pgoyal@penumbrainc.com			
Applicable Regulation:	FCC Part 15 Subpart C (15.247) Industry Canada RSS-247 Issue 2			
Date of Test:	May 5-25, 2022			

We attest to the accuracy of this report:

Aaron Chang Project Engineer Minh Ly EMC Team Lead



TABLE OF CONTENTS

1.0	Sum	mary of Tests	4
2.0	Gene	eral Information	5
	2.1	Product Description	
	2.2	Related Submittal(s) Grants	
	2.3	Test Facility	
	2.4	Test Methodology	
	2.5	Measurement Uncertainty	
3.0	Syste	em Test Configuration	7
	3.1	Support Equipment	
	3.2	Block Diagram of Test Setup	7
	3.3	Justification	
	3.4	Software Exercise Program	8
	3.5	Mode of Operation during Test	
	3.6	Modifications Required for Compliance	8
	3.7	Additions, Deviations and Exclusions from Standards	8
4.0	Meas	surement Results	9
	4.1	6-dB Bandwidth and 99% Occupied Bandwidth	9
	4.2	Maximum Peak Conducted Output Power at Antenna Terminals	22
	4.3	Maximum Power Spectral Density	
	4.4	Out of Band Antenna Conducted Emission	
	4.5	Transmitter Radiated Emissions	47
5.0	List	of Test Equipment	82
6.0	Docu	ıment History	83



1.0 Summary of Tests

Test	Reference FCC	Reference Industry Canada	Result
RF Output Power	15.247(b)(3)	RSS-247, 5.4.d)	Complies
6 dB Bandwidth	6 dB Bandwidth 15.247(a)(2)		Complies
Power Density	15.247(e)	.247(e) RSS-247, 5.2.b) Complies	
Out of Band Antenna Conducted Emission	15.247(d)	RSS-247, 5.5	Complies
Transmitter Radiated Emissions	15.247(d), 15.209, 15.205	RSS-247, 5.5	Complies
AC Line Conducted Emission	15.207	RSS-GEN	Not Applicable – EUT is DC operated
Antenna Requirement	nt 15 /114 RXX_CTRIX		Complies (Internal Antenna)

EUT receive date: May 5, 2022

EUT receive condition: The pre-production version of the EUT was received in good condition

with no apparent damage. As declared by the Applicant, it is identical to

the production units.

Test start date: May 5, 2022

Test completion date: May 25, 2022

The test results in this report pertain only to the item tested.

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 4 of 83



2.0 **General Information**

2.1 **Product Description**

Penumbra Inc. supplied the following description of the EUT:

Xavier is a digital hardware and software medical device platform utilizing virtual reality technology designed for use in healthcare and focusing on physical, neurorehabilitation and/or wellness needs. Xavier 1 is intended to be used in a clinical environment, or any other facility that may facilitate rehabilitation by healthcare providers who have received appropriate training in rehabilitation therapy. Xavier 2 is intended to be used in a residential environment, or any other facility that may facilitate rehabilitation individuals with physical, neurorehabilitation and/or wellness needs. A caregiver may be optionally present to help the user operate the system. The mode to test is in functional mode when the device is completely removed from the charging station and strapped to a patient/user.

Xavier is composed of:

- All-In-One Head Mounted Display (HMD)
- HMD Controller
- Wireless Sensor Modules (WSM)
- Wireless Transmitter Module (WTM)
- Sensor Charger (charging station)
- Tablet (Xavier 1 configuration only)

For more information, refer to the following product specification, declared by the manufacturer.

Information about the 2.4 GHz radio is presented below:

mormation about the 2.4 GHz radio is presented below:			
Applicant	Penumbra Inc.		
Model No.	Xavier 1/Xavier 2		
FCC Identifier	2AQU7-REAL02		
IC Identifier	24199-REAL02		
PMN	REAL System and REAL System 2		
FVIN	02		
HMN	N/A		
HVIN	HMD2		
Type of transmission	Digital Transmission System (DTS), 2 x Radios		
Rated RF Output	7.88 dBm		
Antenna(s) & Gain	Internal Antenna, Peak Gain: 1.3 dBi		
Frequency Range	2402 – 2479 MHz		
Type of modulation/data rate	Gaussian Frequency-shift Keying (GFSK) / 1Mbit/s		
Number of Channel(s)	77		
	Penumbra Inc.		
Applicant Name & One Penumbra Place			
Address	Alameda, CA 94502		
	USA		

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 5 of 83



2.2 Related Submittal(s) Grants

None.

2.3 Test Facility

The test site used to collect the radiated data is site 1 (10-m semi-anechoic chamber). This test facility and site measurement data have been fully placed on file with the FCC, IC and A2LA accredited.

2.4 Test Methodology

Antenna conducted measurements were performed according to the FCC documents "Guidance for Performing Compliance Measurement on Digital Transmission Systems (DTS) Operating under §15.247" (558074 D01 15.247 Meas Guidance v05r02), and RSS-247 Issue 2, RSS-GEN Issue 5.

Radiated emissions and AC mains conducted emissions measurements were performed according to the procedures in ANSI C63.10: 2013. Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "Data Sheet" of this report.

2.5 Measurement Uncertainty

Compliance with the limits was based on the results of the measurements and doesn't take into account the measurement uncertainty.

Estimated Measurement Uncertainty

	Expanded Uncertainty (k=2)			
Measurement	0.15 MHz – 1 GHz	1 GHz – 2.5 GHz	> 2.5 GHz	
RF Power and Power Density – antenna conducted	-	0.7 dB	-	
Unwanted emissions - antenna conducted	1.1 dB	1.3 dB	1.9 dB	
Bandwidth – antenna conducted	-	30 Hz	-	

	Expanded Uncertainty (k=2)					
Measurement	0.15 MHz – 30MHz	30 – 200 MHz	200 MHz – 1 GHz	1 GHz – 18 GHz		
Radiated emissions	-	4.7	4.6	5.1 dB		
AC mains conducted emissions	2.1 dB	-	-	-		

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 6 of 83



3.0 System Test Configuration

3.1 Support Equipment

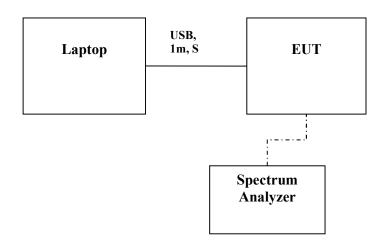
Support Equipment				
Description	Manufacturer	Model Number		
Laptop*	Dell	Latitude 5400		

^{*}Laptop was only used to configure radio channels. In normal usage no laptop will be present.

3.2 Block Diagram of Test Setup

Equipment Under Test						
Description	Description Manufacturer Lot Number Serial Number (LOT Number)					
Radiated Sample of HMD, All-In-One Head Mounted Display	Penumbra, Inc.	E00000543	Not Listed			
Conducted Sample of HMD, All-In-One Head Mounted Display	Penumbra, Inc.	E00000544	Not Listed			

Antenna was removed and co-axial connector with a cable was installed for Conducted Measurements.



S = Shielded	F = With Ferrite
U = Unshielded	m = Length in Meters

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 7 of 83



3.3 Justification

For radiated emission measurements the EUT is placed on a non-conductive table.

According to the manufacturer, each Real Immersive System will consist of Xavier 1: 5 WSM, 1 WTM & 1 HMD or Xavier 2: 2 WSM, 1 WTM & 1 HMD. The WSMs and WTM will be paired to the HMD. The HMD has two radios and WSM/WTM has one radio each. These pairing in this system will use one out of the 77 available channels at a time. The devices in the system share the channel. The devices will not transmit simultaneously on the same channel at any given time. In normal use HMD is mounted on to a VR Headset. The VR Headset transmit using 2.4GHz or 5GHz band. HMD was tested while co-located with the VR Headset under Intertek report 104407842MPK-014. Xavier 2 HMD has an extended piece of plastic but both HMDs are electrically equivalent. Therefore, test results will apply to both HMDs.

Class II permissive change testing was performed for the radio operating at 1Mbps data rate. Full testing was performed.

3.4 Software Exercise Program

The EUT exercise program used during radiated and conducted testing was provided by Penumbra Inc.

3.5 Mode of Operation during Test

As instructed by the manufacturer, the EUT's power setting was set to +8 dBm on the low, middle and high frequencies/channels.

3.6 Modifications Required for Compliance

No modifications were made by the manufacturer or Intertek to the EUT in order to bring the EUT into compliance.

3.7 Additions, Deviations and Exclusions from Standards

No additions, deviations or exclusions from the standard were made.

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 8 of 83



4.0 Measurement Results

4.1 6-dB Bandwidth and 99% Occupied Bandwidth FCC Rule: 15.247(a)(2); RSS-247, 5.2.a) and RSS-GEN;

4.1.1 Requirement

The minimum 6-dB bandwidth shall be at least 500 kHz

4.1.2 Procedure

A spectrum analyzer was connected to the antenna port of the transmitter.

For FCC 6dB Channel Bandwidth the Procedure described in the FCC Publication KDB 558074 D01 Meas Guidance v05r02 was used to determine the DTS occupied bandwidth. Section 11.8.1 Option 1 of ANSI 63.10 was used.

- 1. Set RBW = 100 kHz.
- 2. Set the video bandwidth (VBW) \geq 3 x RBW.
- 3. Detector = Peak.
- 4. Trace mode = max hold.
- 5. Sweep = auto couple.
- 6. Allow the trace to stabilize.
- 7. 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.

For 99% power bandwidth measurement, the bandwidth was determined by using the built-in 99% occupied bandwidth function of the spectrum analyzer. The resolution bandwidth is set to 1% of the selected span as is without being below 1%. The video bandwidth shall be set to 3 times the resolution bandwidth.

4.1.3 Test Result

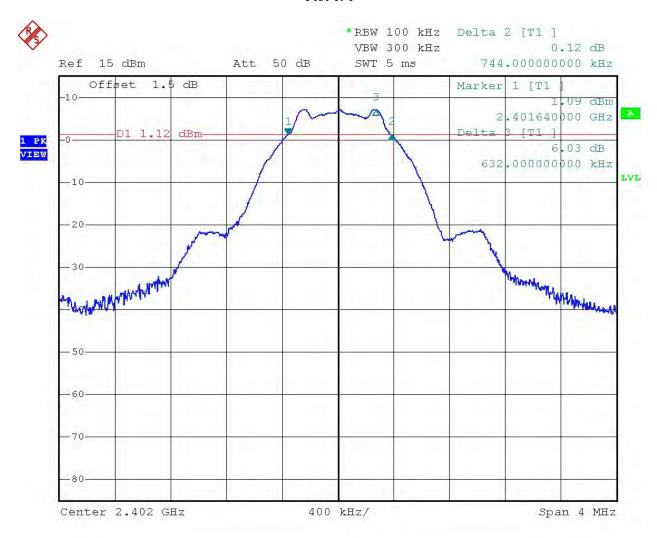
Radio	Frequency (MHz)	6-dB bandwidth FCC 15.247 & RSS-GEN	Plot	Occupied bandwidth, RSS-GEN	Plot
	MHz	kHz		MHz	
	2402	744.000	1.1	1.068	1.4
1	2440	736.000	1.2	1.068	1.5
	2479	728.000	1.3	1.052	1.6
	2402	712.000	1.7	1.068	1.10
2	2440	736.000	1.8	1.068	1.11
	2479	752.000	1.9	1.072	1.12

Tested By	Test Date
Aaron Chang	May 23, 2022

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 9 of 83



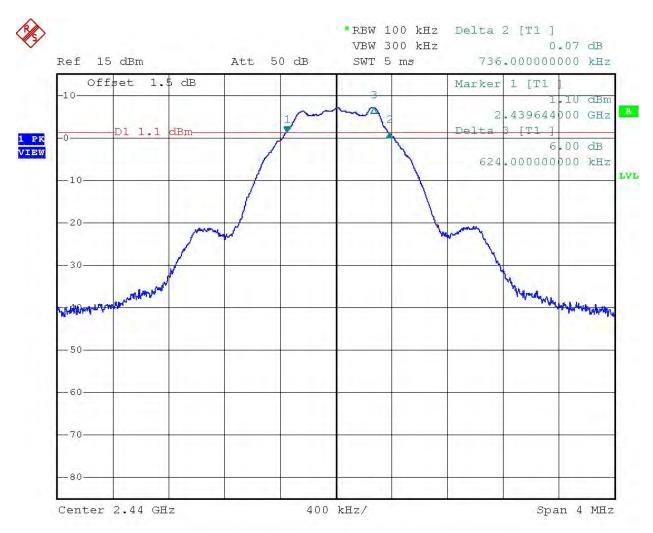
Plot 1. 1



Date: 24.MAY.2022 02:09:52



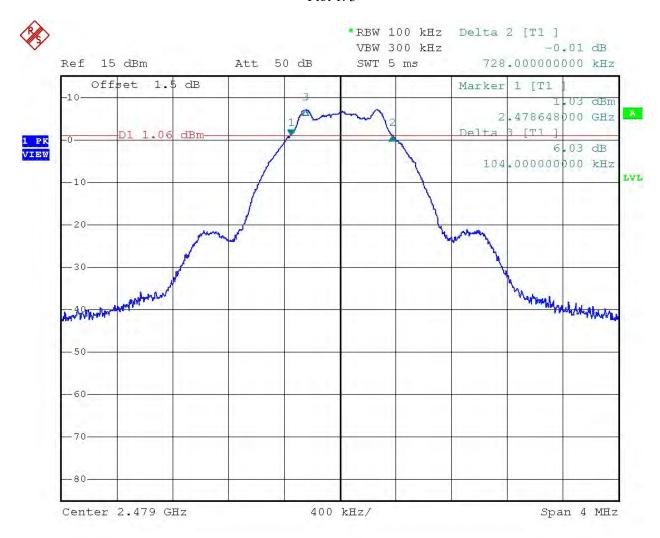
Plot 1. 2



Date: 24.MAY.2022 02:07:34



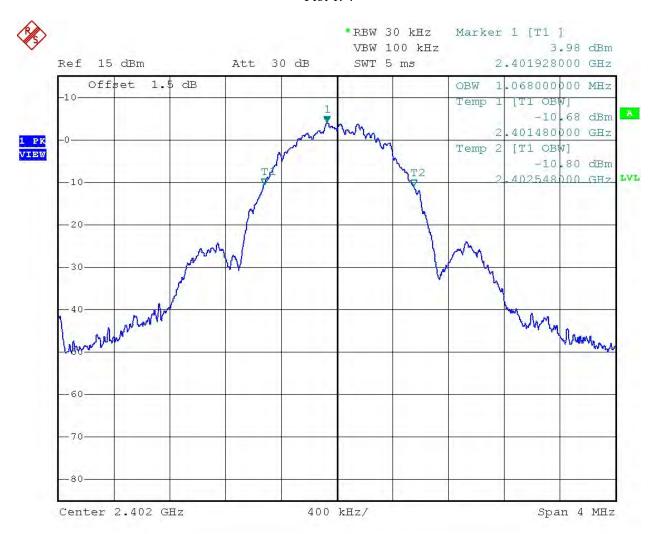
Plot 1. 3



Date: 24.MAY.2022 02:05:47



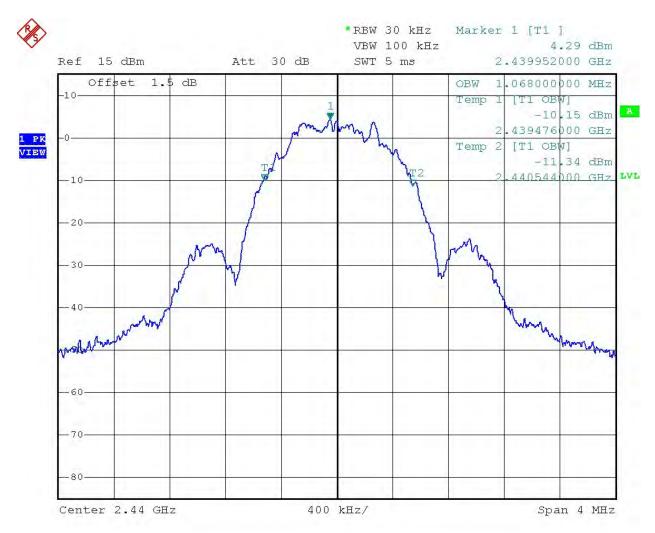
Plot 1. 4



Date: 24.MAY.2022 02:11:45



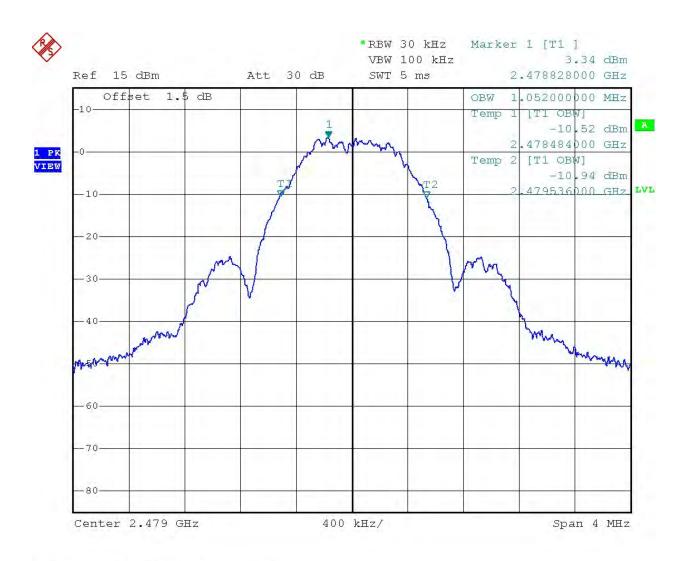
Plot 1.5



Date: 24.MAY.2022 02:13:15



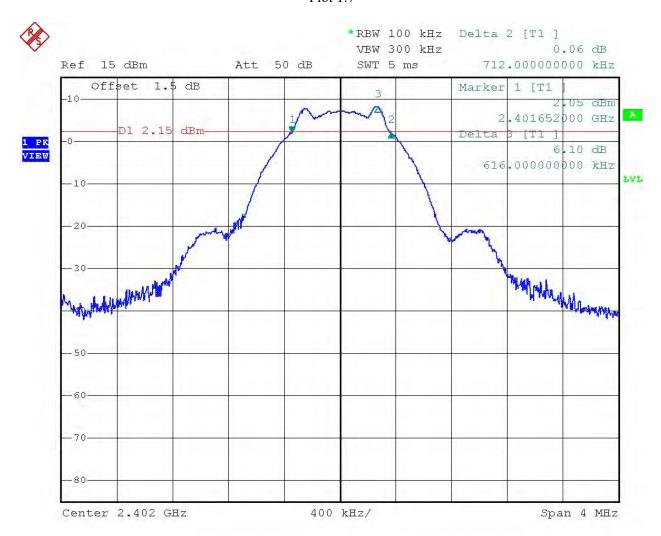
Plot 1.6



Date: 24.MAY.2022 02:15:04



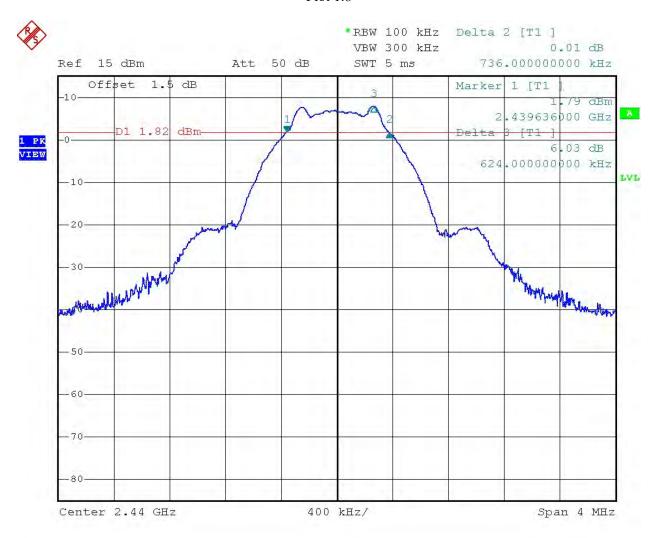
Plot 1.7



Date: 24.MAY.2022 00:57:39



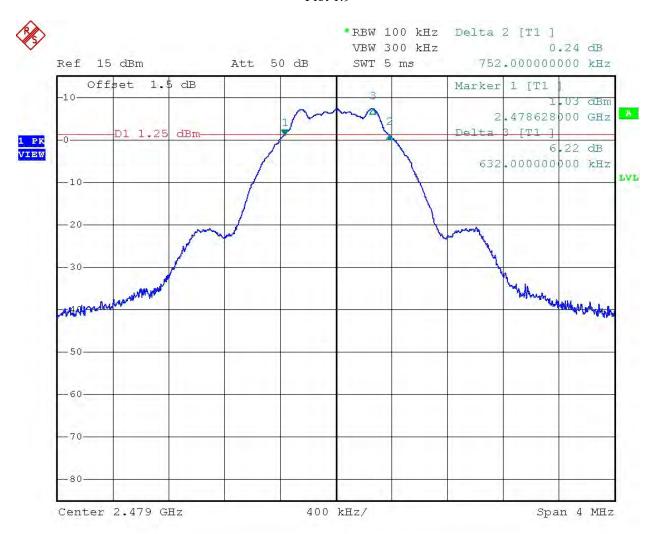
Plot 1.8



Date: 24.MAY.2022 00:59:19



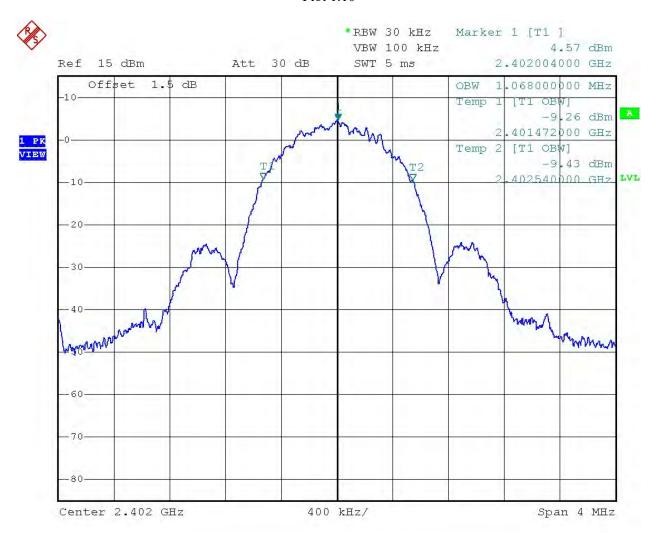
Plot 1.9



Date: 24.MAY.2022 00:55:49



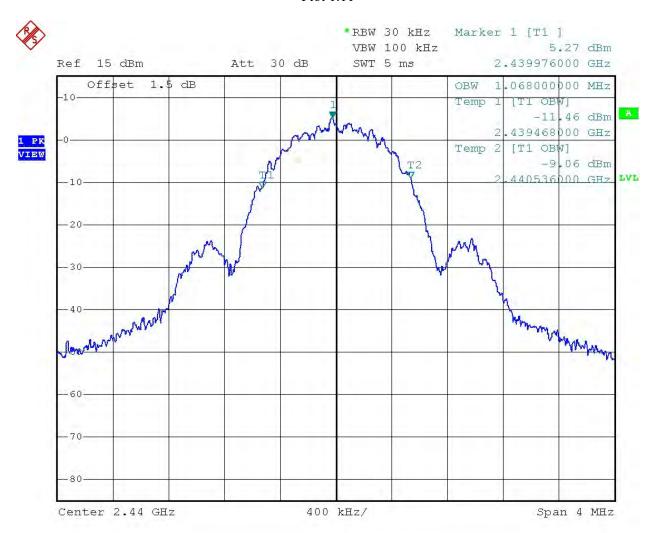
Plot 1.10



Date: 24.MAY.2022 01:02:54



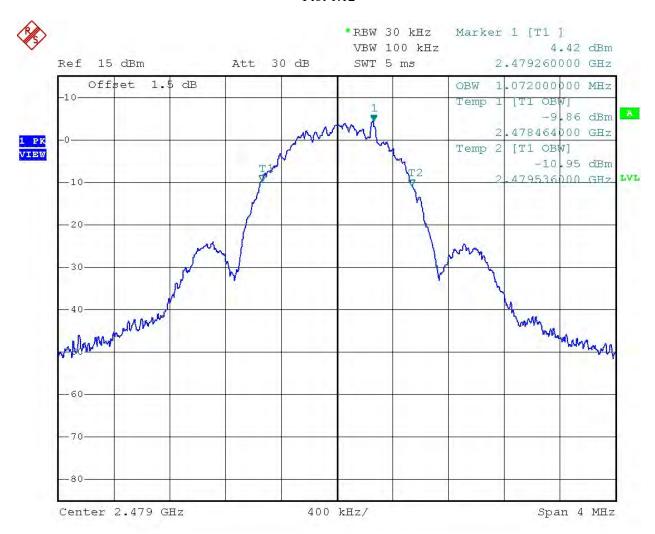
Plot 1.11



Date: 24.MAY.2022 01:00:49



Plot 1.12



Date: 24.MAY.2022 01:01:53



4.2 Maximum Peak Conducted Output Power at Antenna Terminals FCC Rule: 15.247(b)(3); RSS-247, 5.4.d);

4.2.1 Requirement

For antennas with gains of 6 dBi or less, maximum allowed transmitter output is 1 watt or 30 dBm. For antennas with gains greater than 6 dBi, transmitter output level must be decreased appropriately, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

4.2.2 Procedure

The procedure described in FCC Publication KDB 558074 D01 Meas Guidance v05r02 was used. Specifically, section 11.9.1.1 RBW ≥ DTS bandwidth in ANSI 63.10.

- 1. Set the RBW ≥ DTS Bandwidth
- 2. Set the VBW \geq 3 x RBW
- 3. Set the span \geq 3 x RBW
- 4. Detector = Peak
- 5. Sweep time = Auto couple
- 6. Trace mode = Max Hold
- 7. Allow trace to fully stabilize
- 8. Use peak marker function to determine the peak amplitude level.

A spectrum analyzer was connected to the antenna port of the transmitter.

4.2.3 Test Result

Refer to the following plots 2.1 - 2.3 for the test details.

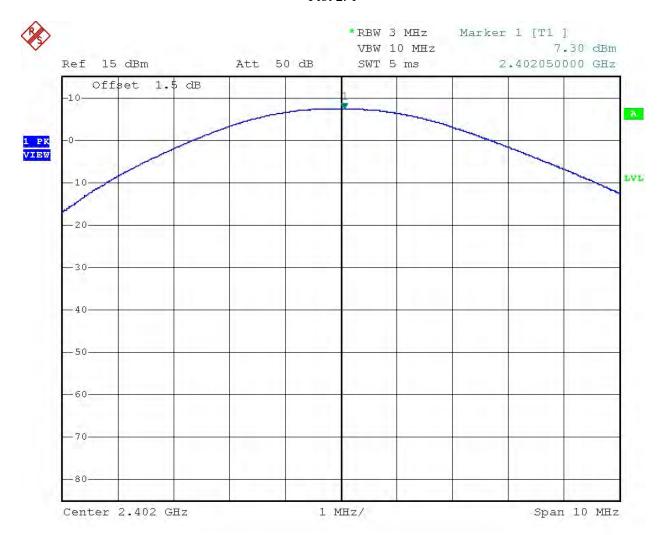
Radio	Frequency	Conducted Power (peak)		Plot
	MHz	dBm	mW	
	2402	7.30	5.37	2.1
1	2440	7.24	5.30	2.2
	2479	7.12	5.15	2.3
2	2402	7.88	6.14	2.4
	2440	7.79	6.01	2.5
	2479	7.55	5.69	2.6

Tested By	Test Date
Aaron Chang	May 23, 2022

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 22 of 83



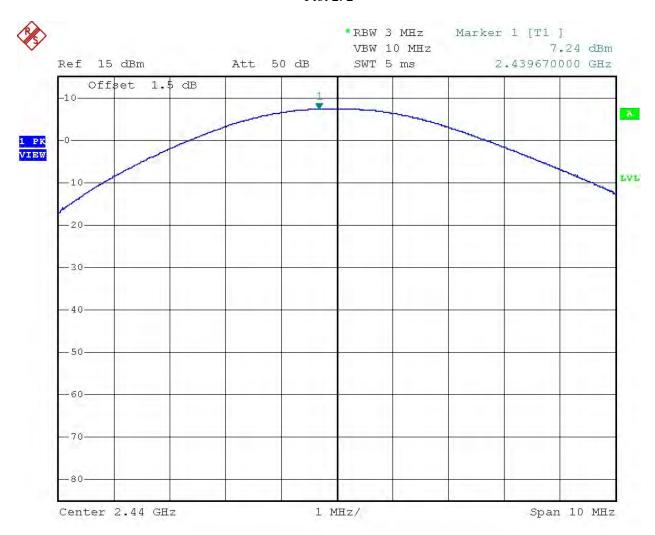
Plot 2. 1



Date: 24.MAY.2022 02:02:57



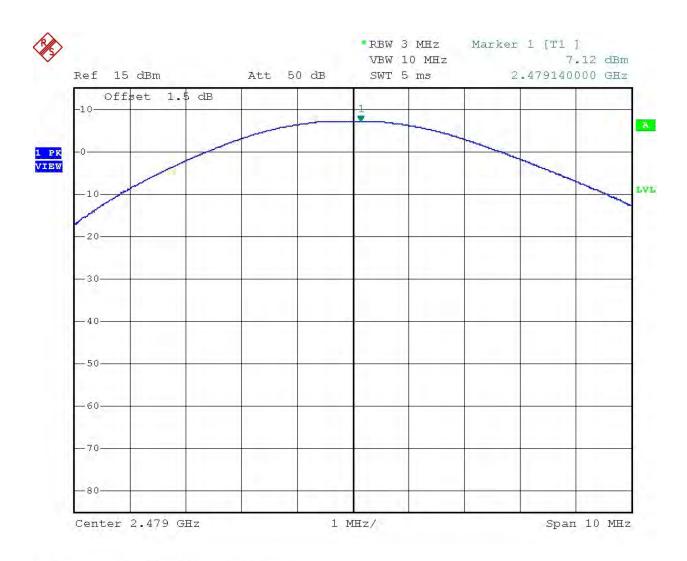
Plot 2. 2



Date: 24.MAY.2022 02:03:34



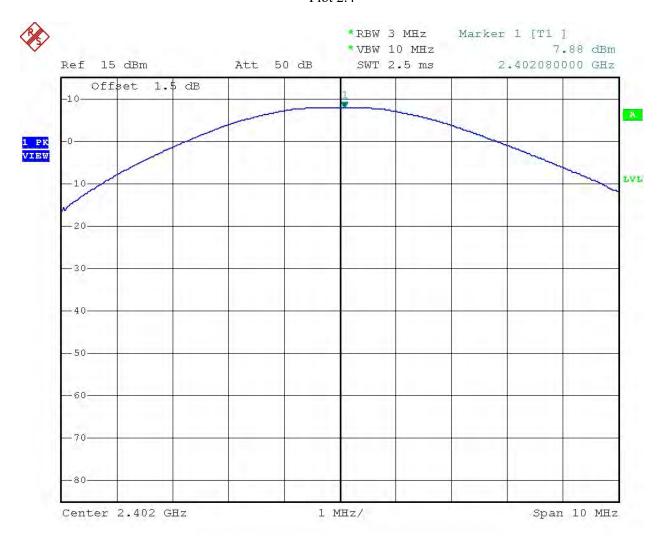
Plot 2. 3



Date: 24.MAY.2022 02:04:14



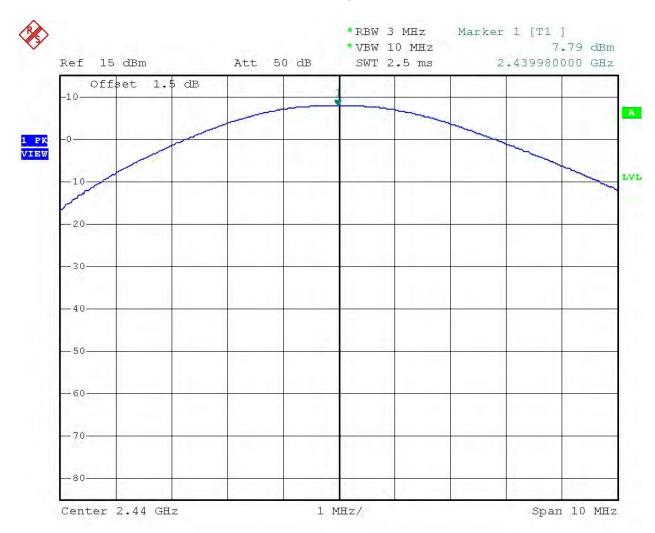
Plot 2.4



Date: 24.MAY.2022 00:49:47



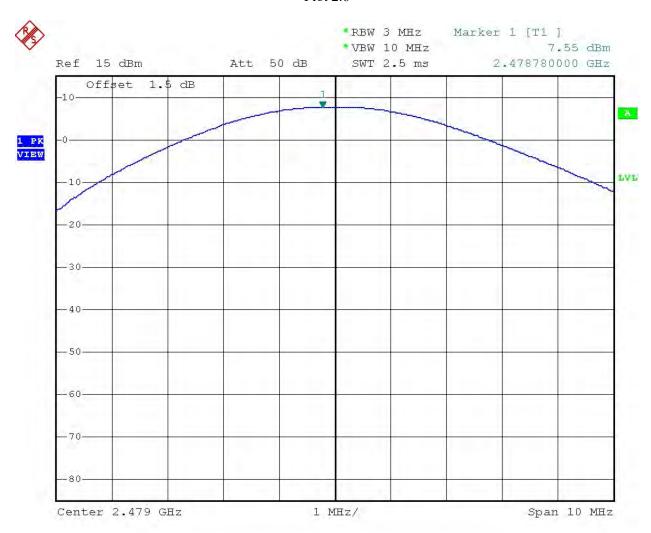
Plot 2.5



Date: 24.MAY.2022 00:50:30



Plot 2.6



Date: 24.MAY.2022 00:51:04



4.3 Maximum Power Spectral Density FCC: 15.247 (e); RSS-247, 5.2.b);

4.3.1 Requirement

For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna should not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

4.3.2 Procedure

A spectrum analyzer was connected to the antenna port of the transmitter.

The procedure described in FCC Publication KDB 558074 D01 Meas Guidance v05r02, specifically section 11.10.2 Method PKPSD (peak PSD) of ANSI 63.10.

- 1. Set analyzer center frequency to DTS channel center frequency.
- 2. Set the span to 1.5 times the *DTS bandwidth*.
- 3. Set the RBW to: $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$.
- 4. Set the VBW \geq 3 x RBW.
- 5. Detector = peak.
- 6. Sweep time = auto couple.
- 7. Trace mode = max hold.
- 8. Allow trace to fully stabilize.
- 9. Use the peak marker function to determine the maximum amplitude level within the RBW.
- 10. If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.

4.3.3 Test Result

Refer to the following plots for the test result

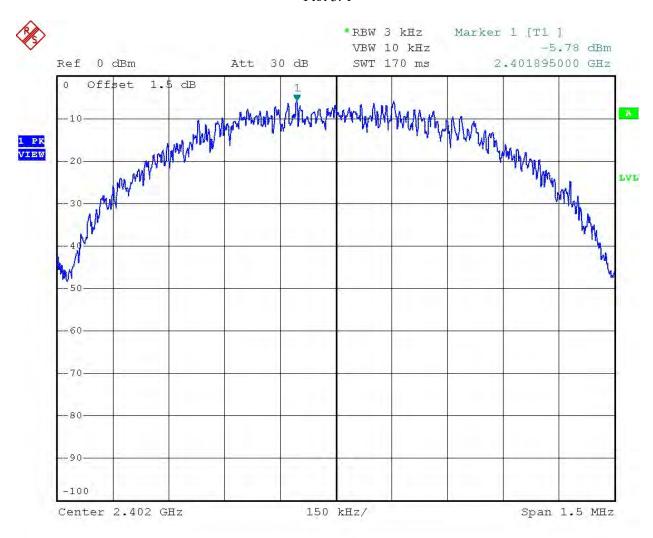
Radio	Frequency,	Maximum Power Spectral Density	Maximum Power Spectral Density Limit	Margin	Plot
	MHz	dBm	dBm	dB	
	2402	-5.78	8.0	-13.78	3.1
1	2440	-5.67	8.0	-13.67	3.2
	2479	-4.92	8.0	-12.92	3.3
	2402	-4.21	8.0	-12.21	3.4
2	2440	-5.24	8.0	-13.24	3.5
	2479	-5.40	8.0	-13.40	3.6

Tested By	Test Date	
Aaron Chang	May 23, 2022	

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 29 of 83



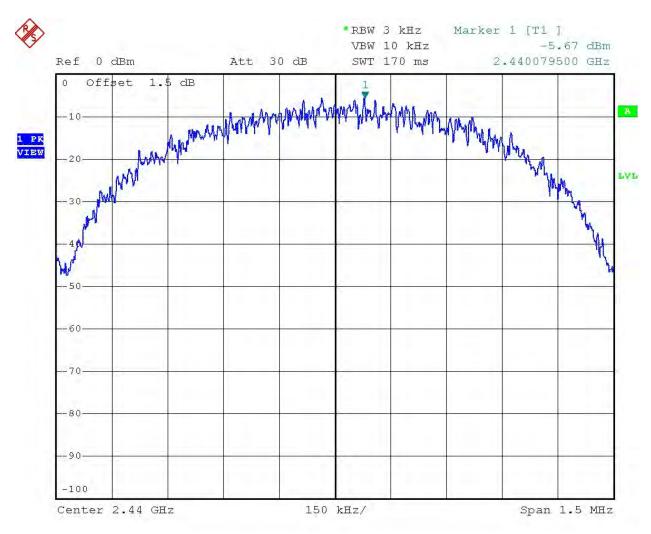
Plot 3. 1



Date: 24.MAY.2022 02:20:10



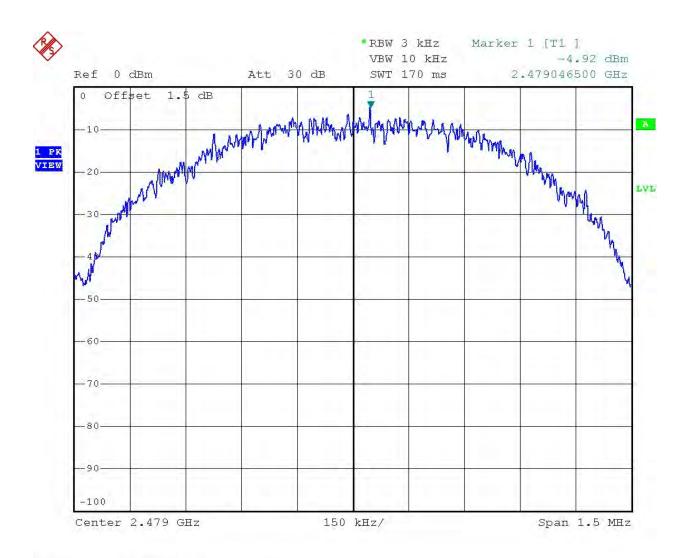
Plot 3. 2



Date: 24.MAY.2022 02:18:20



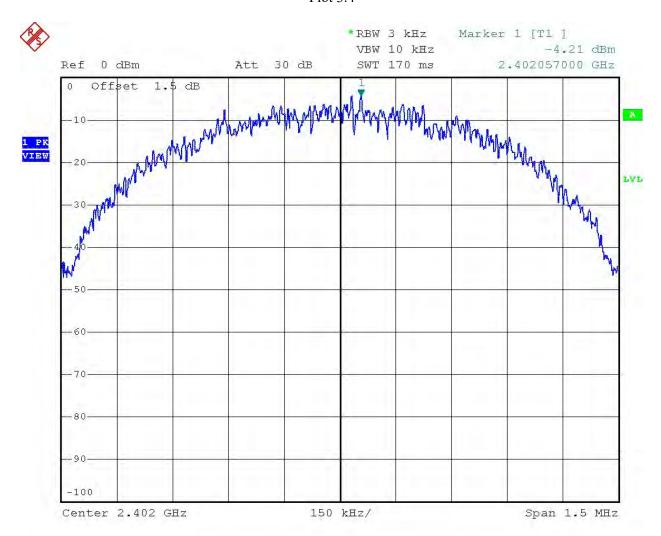
Plot 3. 3



Date: 24.MAY.2022 02:16:28



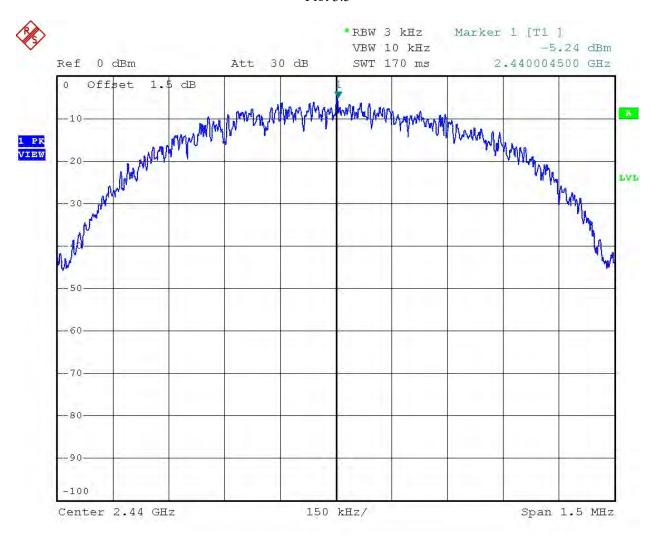
Plot 3.4



Date: 24.MAY.2022 01:04:40



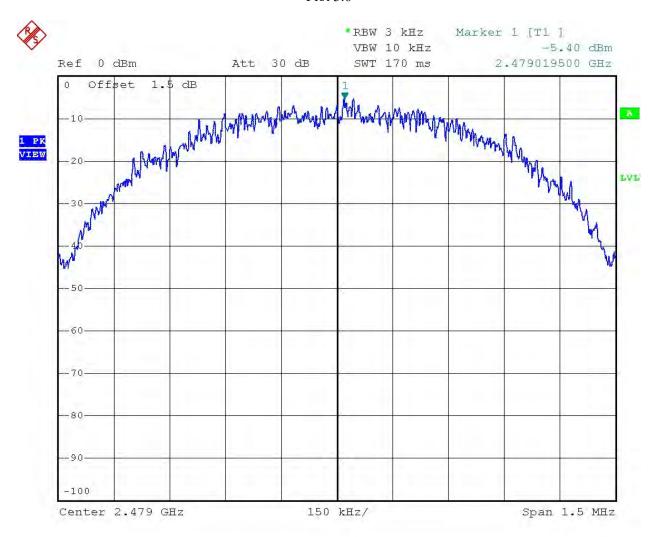
Plot 3.5



Date: 24.MAY.2022 01:05:59



Plot 3.6



Date: 24.MAY.2022 01:07:43



4.4 Out of Band Antenna Conducted Emission FCC: 15.247(d); RSS-247, 5.5;

4.4.1 Requirement

In any 100 kHz bandwidth outside the EUT pass-band, the RF power shall be below the maximum in-band 100 kHz emissions by at least 20 dB (if peak power of in-band emission is measured) or 30 dB (if average power of in-band emission is measured).

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)

4.4.2 Procedure

The procedure described in FCC Publication KDB 558074 D01 Meas Guidance v05r02, specifically section 11.11 DTS Emissions in non-restricted frequency bands of ANSI 63.10.

A spectrum analyzer was connected to the antenna port of the transmitter.

- 1. Set the RBW = 100 kHz.
- 2. Set the VBW \geq 3 x RBW.
- 3. Detector = peak.
- 4. Sweep time = auto couple.
- 5. Trace mode = max hold.
- 6. Allow trace to fully stabilize.
- 7. Use the peak marker function to determine the maximum amplitude level.

The unwanted emissions were measured from 9 kHz to 26 GHz. Plots below are corrected for cable loss and then compared to the limits.

4.4.3 Test Result

Refer to the following plots 4.1 - 4.5 for unwanted conducted emissions. The plot shows -20dB attenuation limit line.

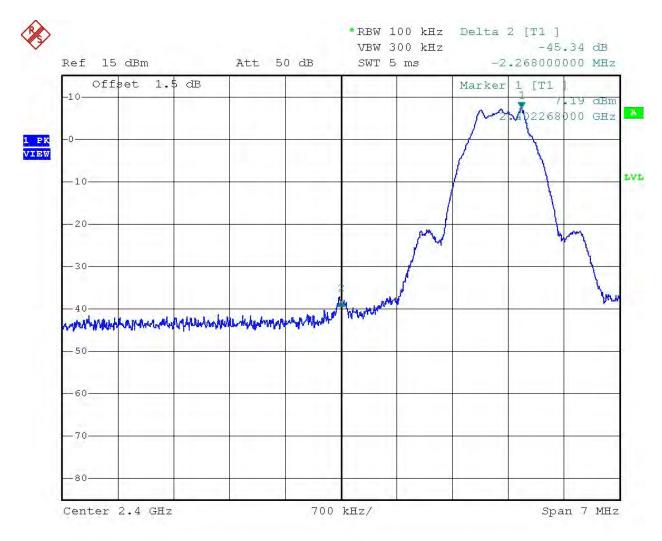
Tested By	Test Date
Aaron Chang	May 23, 2022

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 36 of 83



Tx @ Low Channel Radio 1, 2400 MHz Band Edge

Plot 4.1

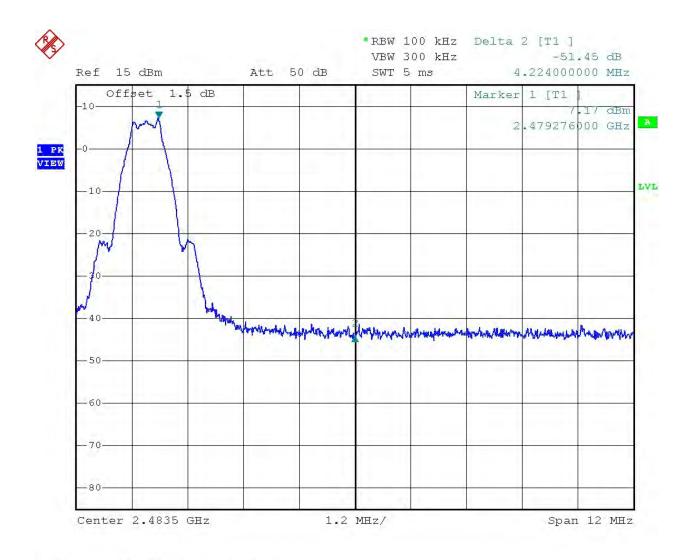


Date: 24.MAY.2022 01:42:06



Tx @ High Channel Radio 1, 2483.5 MHz Band Edge

Plot 4.2

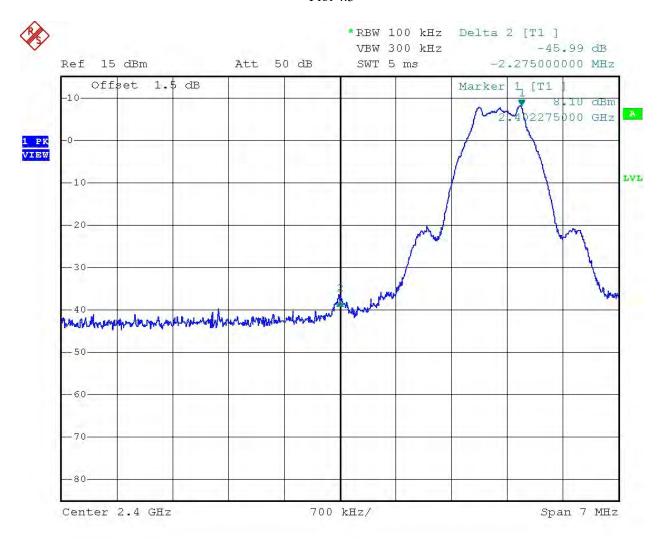


Date: 24.MAY.2022 01:41:10



Tx @ Low Channel Radio 2, 2400 MHz Band Edge

Plot 4.3

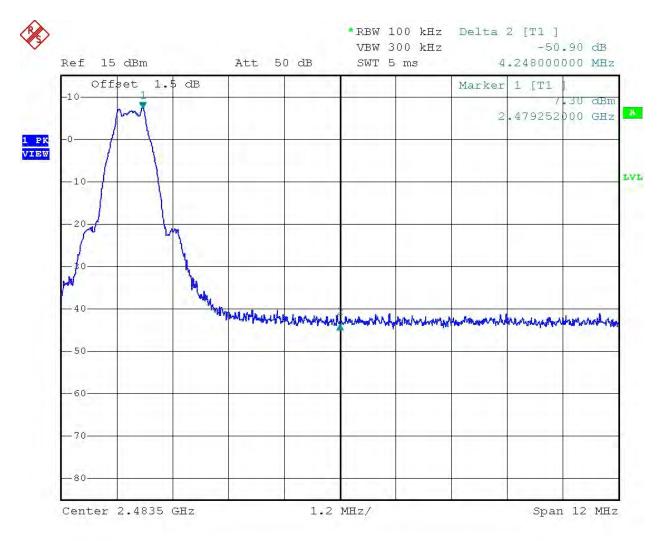


Date: 24.MAY.2022 01:11:46



Tx @ High Channel Radio 2, 2483.5 MHz Band Edge

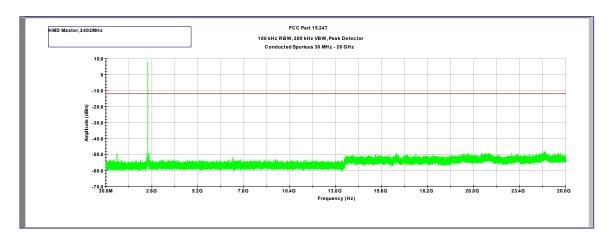
Plot 4.4



Date: 24.MAY.2022 01:10:13

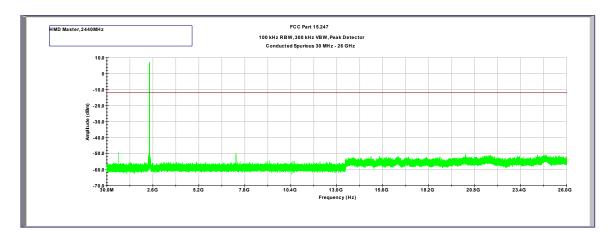


Tx @ Low Channel Radio 1, 2402 MHz 30MHz -26GHz Conducted Spurious Plot 4.5



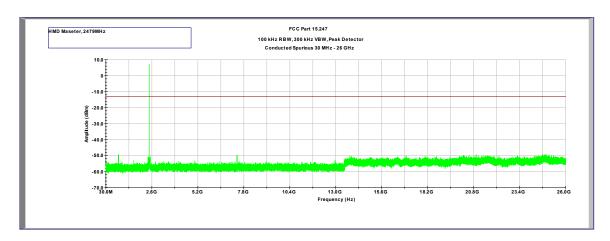


Tx @ Mid Channel Radio 1, 2440 MHz 30MHz -26GHz Conducted Spurious Plot 4.6





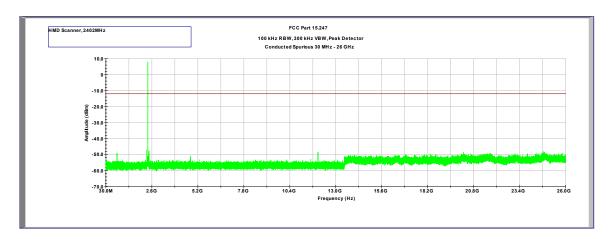
Tx @ High Channel Radio 1, 2479 MHz 30MHz -26GHz Conducted Spurious Plot 4.7



File: 105041185MPK-001 Page 43 of 83

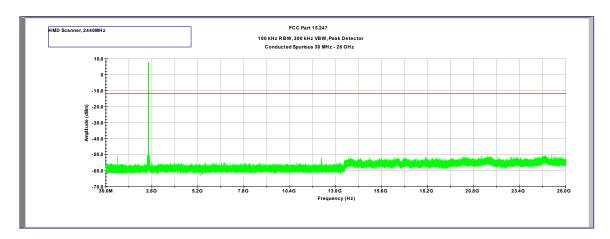


Tx @ Low Channel Radio 2, 2402 MHz 30MHz -26GHz Conducted Spurious Plot 4.8



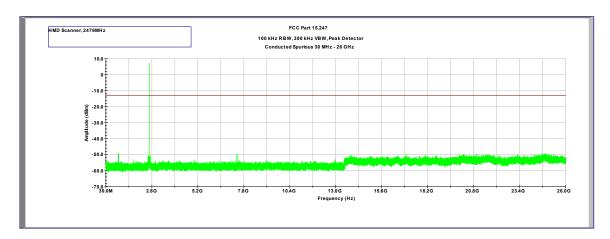


Tx @ Mid Channel Radio 2, 2440 MHz 30MHz -26GHz Conducted Spurious Plot 4.9





Tx @ High Channel Radio 2, 2479 MHz 30MHz -26GHz Conducted Spurious Plot 4.10



File: 105041185MPK-001 Page 46 of 83



4.5 Transmitter Radiated Emissions FCC Rules: 15.247(d), 15.209, 15.205; RSS-247, 5.5;

4.5.1 Requirement

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)).

For out of band radiated emissions (except for frequencies in restricted bands), in any 100 kHz bandwidths outside the EUT pass-band, the RF power shall be at least 20dB (peak) or 30 dB (average) below that of the maximum in-band 100 kHz emissions.

4.5.2 Procedure

Radiated emission measurements were performed from 9 kHz to 26 GHz according to the procedure described in ANSI C63.10: 2013. Spectrum Analyzer Resolution Bandwidth is 200Hz or greater for frequencies 9kHz to 30MHz, 100 kHz or greater for frequencies 30 MHz to 1000 MHz, 1 MHz for frequencies above 1000 MHz. Above 1000 MHz Peak and Average measurements were performed.

The EUT is placed on a plastic turntable that is 80 cm in height for below 1000MHz and 1.5m in height for above 1GHz. If the EUT attaches to peripherals, they are connected and operational (as typical as possible). During testing, all cables were manipulated to produce worst-case emissions. The signal is maximized through rotation. The antenna height and polarization are varied during the search for maximum signal level. The antenna height is varied from 1 to 4 meters.

Radiated emissions are taken at 3 meters for frequencies above 1 GHz and at 10 meters for frequencies below 1 GHz.

Measurements made from 1 GHz to 18GHz had a 2.4-2.5GHz notch filter in place. A preamp was used from 30MHz to 26GHz.

All measurements were made with a Peak Detector and compared to QP limits for 30MHz - 1GHz and Average limits for 1GHz - 26GHz.

Radiated measurements were performed on the X, Y and Z orientation of the EUT. Data is presented with the worst-case configuration (the configuration which resulted in the highest emission levels).

Correlation measurements were performed below 30MHz between 10m ALSE and Open Field site according to FCC KDB 414788 D01 Radiated Test Site v01r01 section 2. All readings were within the acceptable tolerance.

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 47 of 83



4.5.3 Field Strength Calculation

Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

FS = RA + AF + CF - AG; if measurement is performed at a distance other than specified in the rule, a Distance Correction Factor (DCF) shall be added.

Where $FS = Field Strength in dB(\mu V/m)$

RA = Receiver Amplitude (including preamplifier) in $dB(\mu V)$; AF = Antenna Factor in dB(1/m)

CF = Cable Attenuation Factor in dB; AG = Amplifier Gain in dB

Assume a receiver reading of 52.0 dB(μ V) is obtained. The antennas factor of 7.4 dB(1/m) and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted, giving field strength of 32 dB(μ V/m). This value in dB(μ V/m) was converted to its corresponding level in μ V/m.

 $RA = 52.0 dB(\mu V)$

AF = 7.4 dB(1/m)

CF = 1.6 dB

AG = 29.0 dB

 $FS = 52.0+7.4+1.6-29.0 = 32 \text{ dB}(\mu\text{V/m}).$

Level in $\mu V/m = \text{Common Antilogarithm} [(32 \text{ dB}\mu V/m)/20] = 39.8 \ \mu V/m.$

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 48 of 83



4.5.4 Antenna-port conducted measurements

Antenna-port conducted measurements may also be used as an alternative to radiated measurements for demonstrating compliance in the restricted frequency bands. If conducted measurements are performed, then proper impedance matching must be ensured and an additional radiated test for cabinet/case spurious emissions is required.

4.5.5 General Procedure for conducted measurements in restricted bands

- a) Measure the conducted output power (in dBm) using the detector specified for determining quasi-peak, peak, and average conducted output power, respectively.
- b) Add the maximum transmit antenna gain (in dBi) to the measured output power level to determine the EIRP level (see 12.2.5 for guidance on determining the applicable antenna gain)
- c) Add the appropriate maximum ground reflection factor to the EIRP level (6 dB for frequencies \leq 30 MHz, 4.7 dB for frequencies between 30 MHz and 1000 MHz, inclusive and 0 dB for frequencies \geq 1000 MHz).
- d) For devices with multiple antenna-ports, measure the power of each individual chain and sum the EIRP of all chains in linear terms (*e.g.*, Watts, mW).
- e) Convert the resultant EIRP level to an equivalent electric field strength using the following relationship:

E = EIRP - 20log D + 104.8 + DCF (DCF for Average measurements)

where:

 $E = electric field strength in dB\mu V/m$,

EIRP = equivalent isotropic radiated power in dBm

D = specified measurement distance in meters.

DCF = Duty Cycle Correction Factor

- f) Compare the resultant electric field strength level to the applicable limit.
- g) Perform radiated spurious emission test

4.5.6 Test Results

All testing in this section were performed by radiated measurements.

Tested By	Test Date
Aaron Chang	May 5-25, 2022

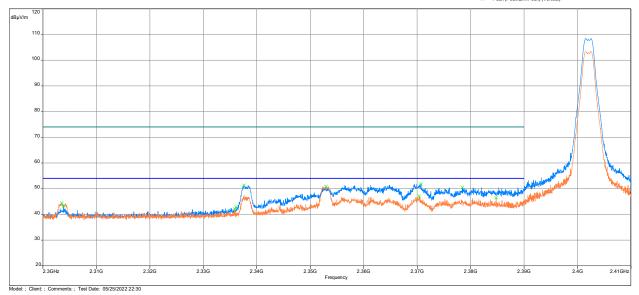
EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 49 of 83



Test Results: 15.209/15.205 Radiated Restricted Band Emissions

Radiated Out-of-Band Spurious Emissions with antenna at the Band Edge Tx @ 2402 MHz, Radio 1 Peak vs Peak & Average Limits





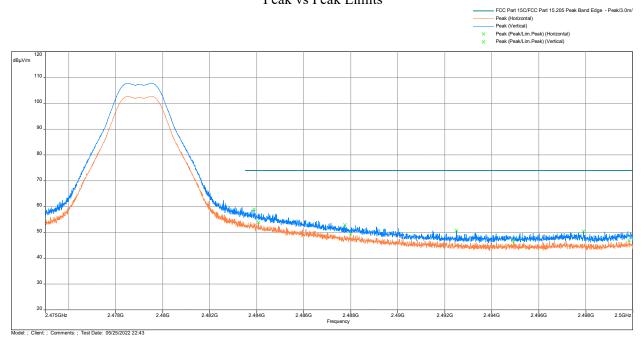
Frequency MHz	Peak@3m dBμV/m	Lim.@3m Avg dBµV/m	Margin (dB)	Height (m)	Angle (°)	Comment	Correction (dB)
2370.726	51.85	54	-2.15	1.01	23.5	Vertical	-12.02
2337.594	51.34	54	-2.66	1.01	352	Vertical	-12.27
2352.976	50.87	54	-3.13	1.01	56	Horizontal	-12.15
2378.47	50.5	54	-3.5	1.01	337.75	Vertical	-11.95

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135) File: 105041185MPK-001

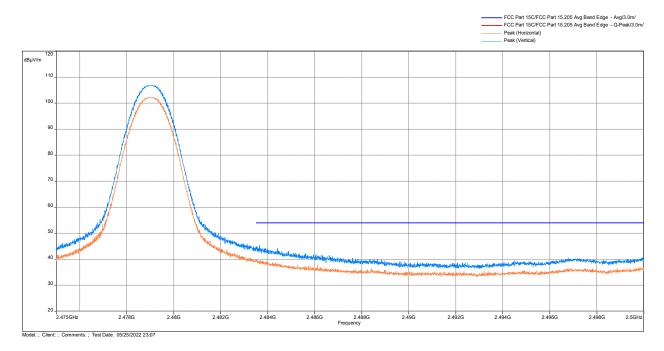
Page 50 of 83



Radiated Out-of-Band Spurious Emissions with antenna at the Band Edge Tx @ 2479 MHz, Radio 1 Peak vs Peak Limits



Radiated Out-of-Band Spurious Emissions with antenna at the Band Edge Tx @ 2479 MHz, Radio 1 Avg vs Avg Limits



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 51 of 83



Frequency MHz	Peak@3m dBμV/m	Lim.@3m Peak dBµV/m	Margin (dB)	Height (m)	Angle (°)	Comment	Correction (dB)
2483 5	58 92	74	-15.08	1.01	31.75	Vertical	-11.55

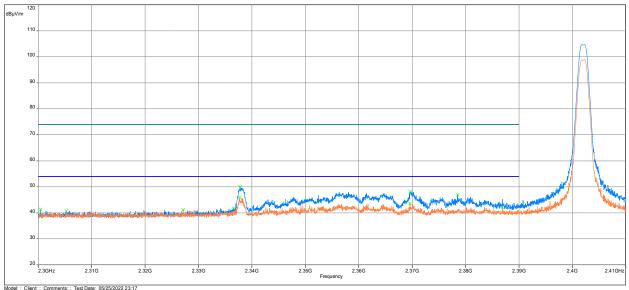
Frequency MHz	Avg@3m dBμV/m	Lim.@3m Avg dBµV/m	Margin (dB)	Height (m)	Angle (°)	Comment	Correction (dB)
2483.5	44.85	54	-9.15	1.01	30	Vertical	-11.55

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 52 of 83



Radiated Out-of-Band Spurious Emissions with antenna at the Band Edge Tx @ 2402 MHz, Radio 2 Peak vs Peak & Average Limits



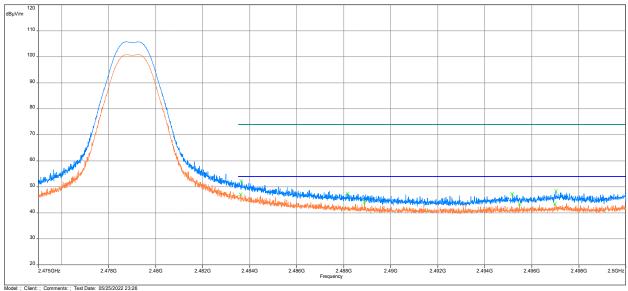


Frequency MHz	Peak@3m dBμV/m	Lim.@3m Avg dBµV/m	Margin (dB)	Height (m)	Angle (°)	Comment	Correction (dB)
2337.785	50.03	54	-3.97	1.01	29.5	Vertical	-12.27
2369.623	48.16	54	-5.84	1.01	22.5	Vertical	-12.03
2378.485	46.96	54	-7.04	1.01	22.5	Vertical	-11.95
2390.000	43.56	54	-10.44	1.01	243	Vertical	-11.87



Radiated Out-of-Band Spurious Emissions with antenna at the Band Edge Tx @ 2479 MHz, Radio 2 Peak vs Peak & Average Limits





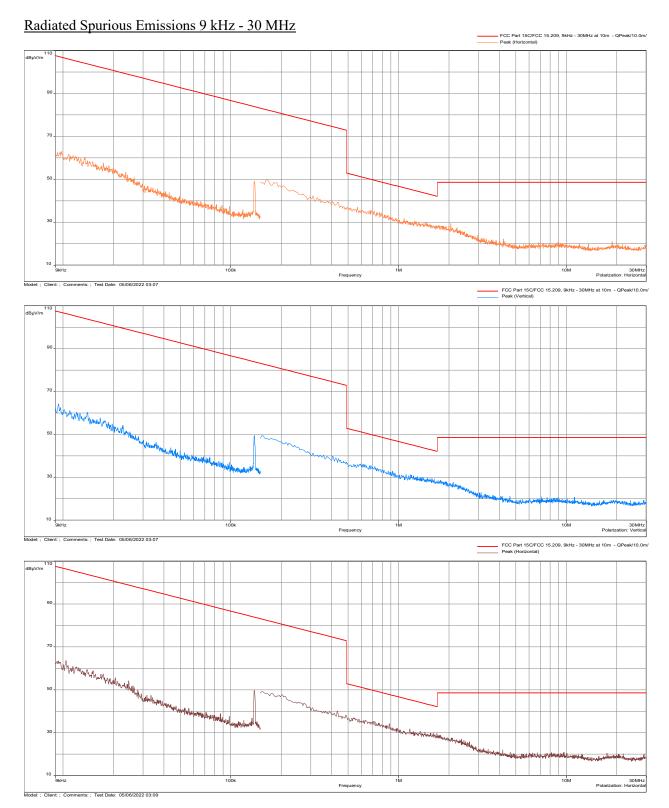
		Lim.@3m					
Frequency	Peak@3m	Avg	Margin	Height	Angle		Correction
MHz	dBμV/m	dBμV/m	(dB)	(m)	(°)	Comment	(dB)
2483.500	52.23	54	-1.77	1.01	0	Vertical	-11.55

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 54 of 83



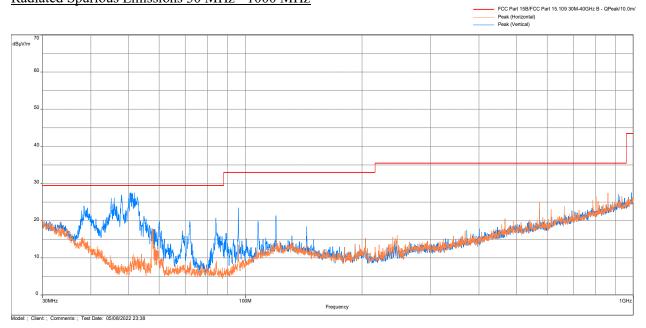
Out-of-Band Radiated Spurious Emissions

Test Results: 15.209 Radiated Spurious Emissions Low Channel, Tx at 2402MHz, Radio 1





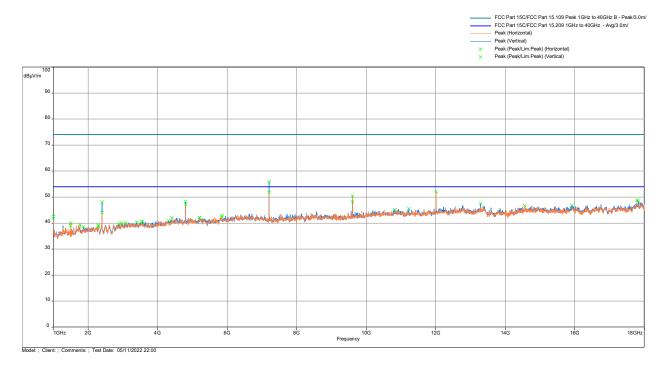
Radiated Spurious Emissions 30 MHz - 1000 MHz



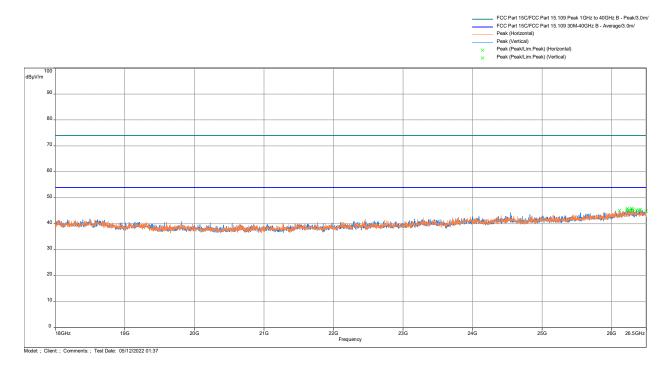
EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 56 of 83



Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 57 of 83



Total	Ouality.	Assured.

Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(μV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
45.940	26.11	29.5	-3.39	4	338.25	Vertical	-17.4
47.977	26.85	29.5	-2.65	1.96	0	Vertical	-18.51
50.790	27.53	29.5	-1.97	2.99	286.25	Vertical	-19.42
51.243	27.33	29.5	-2.17	0.99	268.25	Vertical	-19.52
51.890	27.49	29.5	-2.01	4	128.25	Vertical	-19.64
52.698	26.42	29.5	-3.08	4	181	Vertical	-19.8

Freq. MHz	Peak@3m dB(uV/m)	Peak Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
4803.467	47.12	74	-26.88	1.99	266	Horizontal	-6.92
4804.600	48.31	74	-25.69	1.99	314.25	Vertical	-6.92
7206.700	55.85	74	-18.15	1.99	285.25	Vertical	-4.21
7206.700	51.91	74	-22.09	1.99	0.25	Horizontal	-4.21
9607.100	50.44	74	-23.56	1.99	273.25	Horizontal	-1.94
9607.100	48.27	74	-25.73	1.99	239.5	Vertical	-1.94
12011.467	52.04	74	-21.96	1.99	241.75	Horizontal	0.08

Freq. MHz	Avg@3m dB(uV/m)	Avg Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
4804.033	42.78	54	-11.22	1.99	295.5	Vertical	-6.92
4804.033	40.86	54	-13.14	1.99	42	Horizontal	-6.92
7206.700	52.53	54	-1.47	1.99	273.75	Vertical	-4.21
7206.700	45.56	54	-8.44	1.99	260.75	Horizontal	-4.21
9608.800	45.93	54	-8.07	1.99	347.5	Horizontal	-1.94
9608.800	42.97	54	-11.03	1.99	229.75	Vertical	-1.94
12009.200	45.7	54	-8.3	1.99	347.5	Horizontal	0.08

Note: FS = RA + Correction

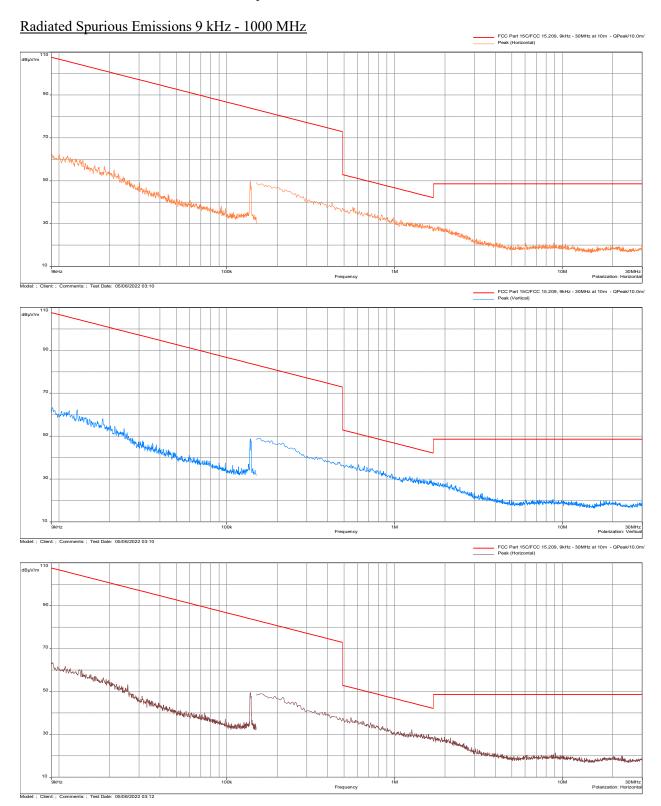
Correction = AF + CF - Preamp

Results	Complies

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 58 of 83

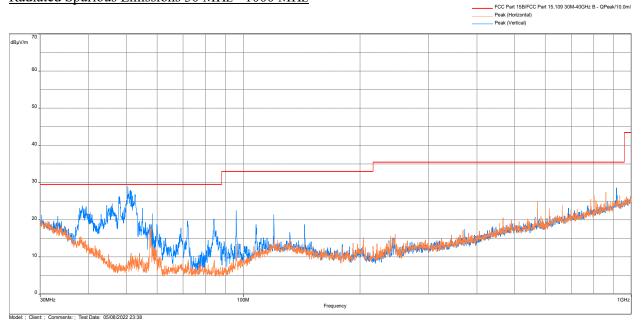


Test Results: 15.209 Radiated Spurious Emissions Mid Channel, Tx at 2440MHz, Radio 1





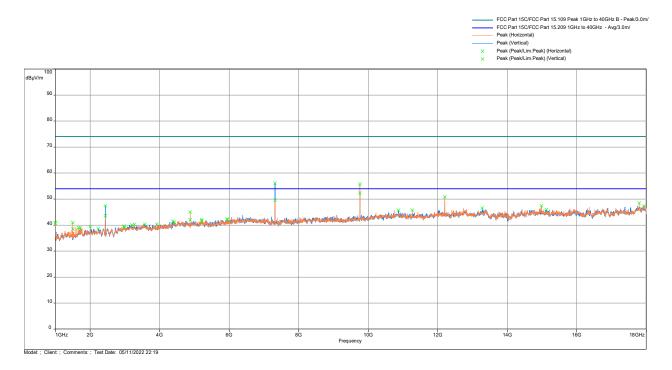
Radiated Spurious Emissions 30 MHz - 1000 MHz



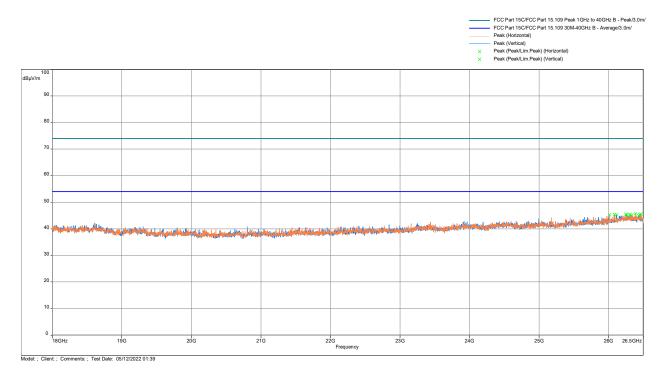
EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 60 of 83



Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 61 of 83



Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(µV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
50.467	28.99	29.5	-0.51	2.99	0	Vertical	-19.32
51.275	27.98	29.5	-1.52	1.98	251	Vertical	-19.53
51.599	27.62	29.5	-1.88	4	181	Vertical	-19.59
51.857	26.42	29.5	-3.08	1.98	241.25	Vertical	-19.64
52.763	26.75	29.5	-2.75	4	163.25	Vertical	-19.81

Freq. MHz	Peak@3m dB(uV/m)	Peak Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
4879.400	44.97	74	-29.03	1.99	241.5	Horizontal	-6.9
4880.533	42.07	74	-31.93	1.49	249.25	Vertical	-6.9
7319.467	56.12	74	-17.88	1.99	302	Vertical	-4.09
7320.600	49.58	74	-24.42	1.99	241.5	Horizontal	-4.09
9758.967	52.28	74	-21.72	1.49	217.25	Vertical	-1.72
9761.233	55.79	74	-18.21	1.51	280.5	Horizontal	-1.72
12201.300	50.81	74	-23.19	1.99	317.5	Horizontal	0.13

Freq. MHz	Avg@3m dB(uV/m)	Avg Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
4879.400	37.82	54	-16.18	1.49	326	Vertical	-6.9
4879.967	38.93	54	-15.07	1.99	260.5	Horizontal	-6.9
7319.467	51.61	54	-2.39	1.99	296	Vertical	-4.09
7320.600	44.01	54	-9.99	1.99	216.75	Horizontal	-4.09
9760.667	47.27	54	-6.73	1.99	229.75	Vertical	-1.72
9761.233	51.85	54	-2.15	1.51	317.75	Horizontal	-1.72
12201.300	46	54	-8	1.99	347.25	Horizontal	0.13

Note: FS = RA + Correction

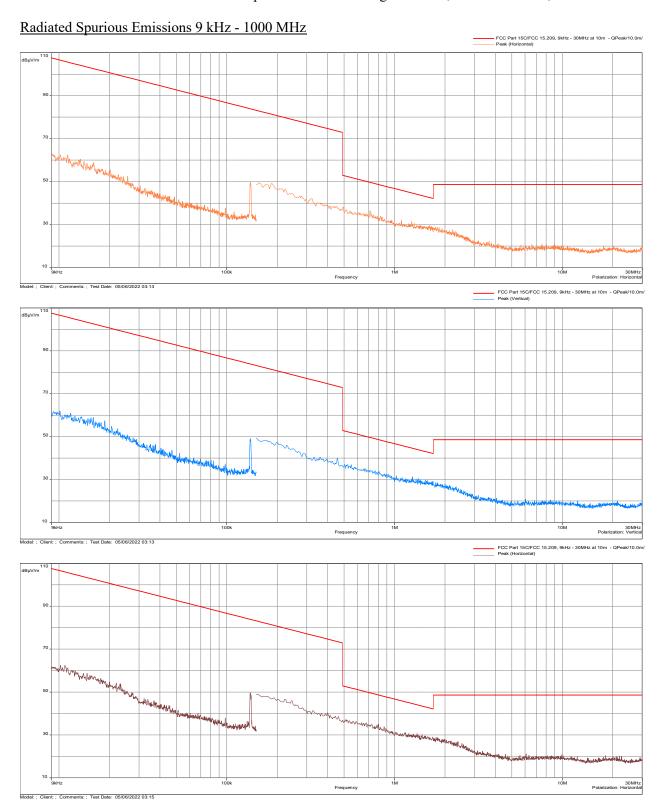
Correction = AF + CF - Preamp

Results	Complies
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EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 62 of 83

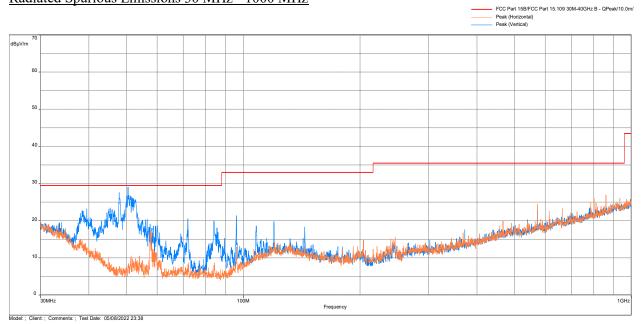


Test Results: 15.209 Radiated Spurious Emissions High Channel, Tx at 2479MHz, Radio 1





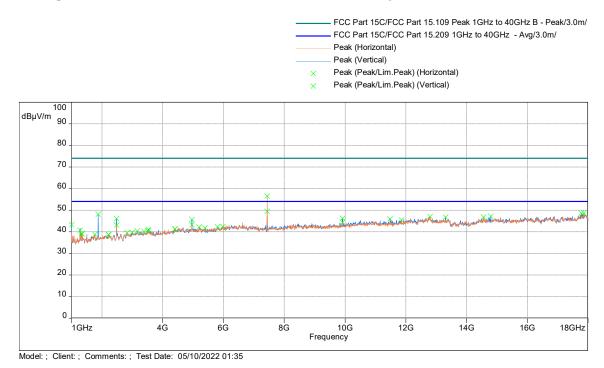
Radiated Spurious Emissions 30 MHz - 1000 MHz



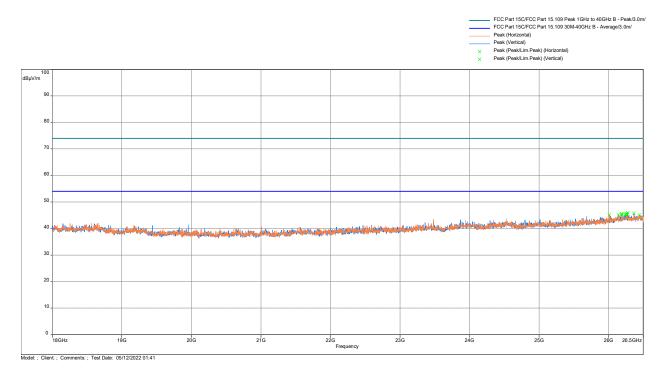
EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 64 of 83



Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 65 of 83



Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(µV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
50.144	26.69	29.5	-2.81	4	286.25	Vertical	-19.23
50.499	29.05	29.5	-0.45	3	320.25	Vertical	-19.33
51.566	26.4	29.5	-3.1	4	259.75	Vertical	-19.58
51.857	26.07	29.5	-3.43	4	127.25	Vertical	-19.64
52.148	25.98	29.5	-3.52	2	67.5	Vertical	-19.69

Freq. MHz	Peak@3m dB(uV/m)	Peak Limit@3m dB(μV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
7440.733	56.49	74	-17.51	1.99	284.25	Horizontal	-3.87
7440.733	49.5	74	-24.5	1.51	273.75	Vertical	-3.87

Freq. MHz	Avg@3m dB(uV/m)	Avg Limit@3m dB(μV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
7439.033	52.17	54	-1.83	1.99	260.75	Horizontal	-3.88
7440.733	45.74	54	-8.26	1.51	43.75	Vertical	-3.87

Note: FS = RA + Correction

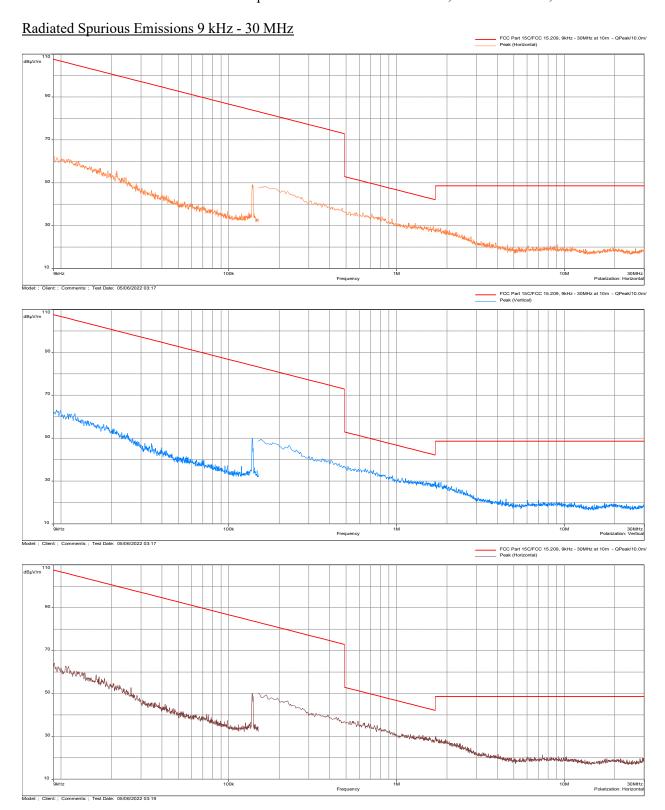
Correction = AF + CF - Preamp

Results	Complies

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 66 of 83

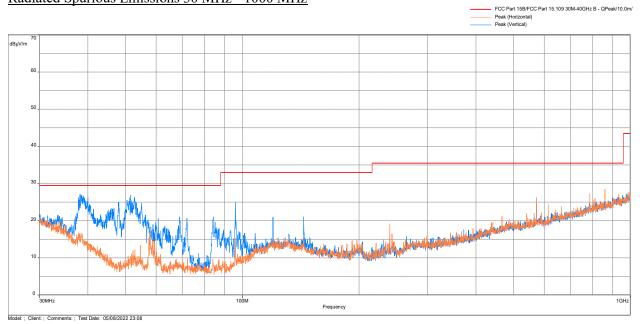


Test Results: 15.209 Radiated Spurious Emissions Low Channel, Tx at 2402MHz, Radio 2



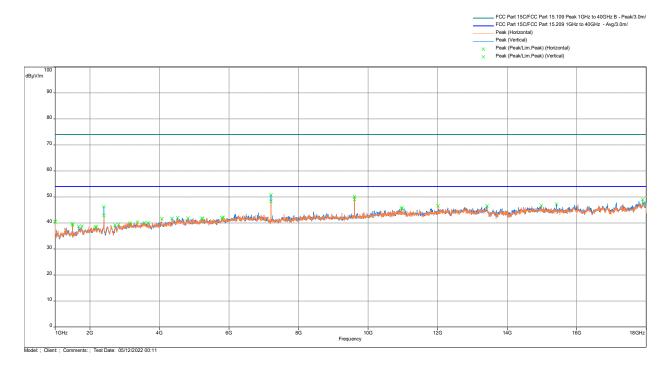


Radiated Spurious Emissions 30 MHz - 1000 MHz

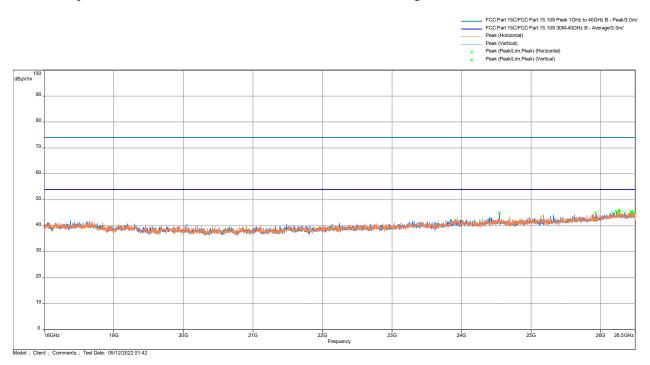




Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 69 of 83



Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(µV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
38.148	27.02	29.5	-2.48	0.98	251	Vertical	-11.95
38.374	27.04	29.5	-2.46	2	181.5	Vertical	-12.12
40.023	26.2	29.5	-3.3	2	49.25	Vertical	-13.33
51.599	26.93	29.5	-2.57	3	232.75	Vertical	-19.59
52.795	26.28	29.5	-3.22	2	215.25	Vertical	-19.82

Freq. MHz	Peak@3m dB(uV/m)	Avg Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
7206.700	50.84	54	-3.16	1.49	341	Vertical	-4.21
7206.700	48.34	54	-5.66	1.99	335	Horizontal	-4.21
9607.100	50.17	54	-3.83	1.51	0	Horizontal	-1.94
9608.800	49.06	54	-4.94	1.99	15.25	Vertical	-1.94

Note: FS = RA + Correction

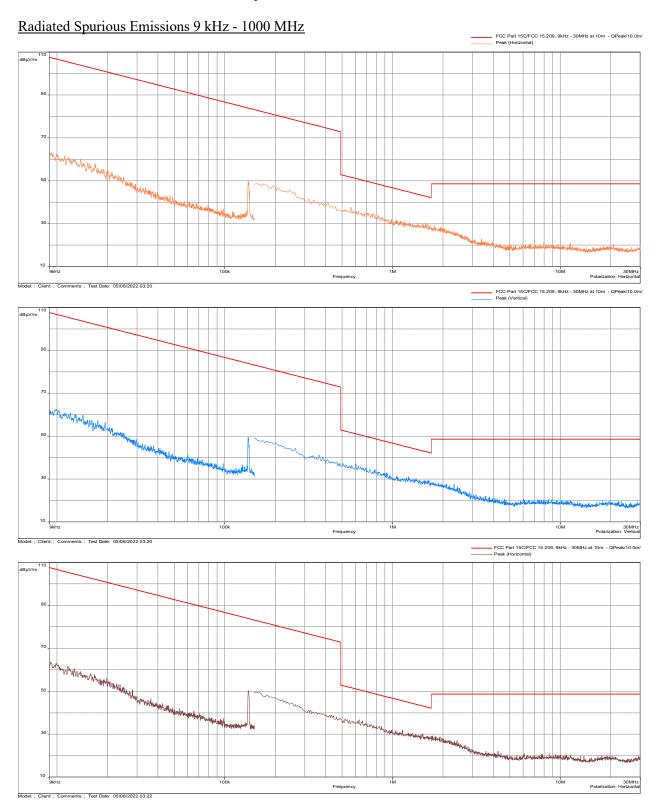
Correction = AF + CF - Preamp

desults Complies	
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EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 70 of 83

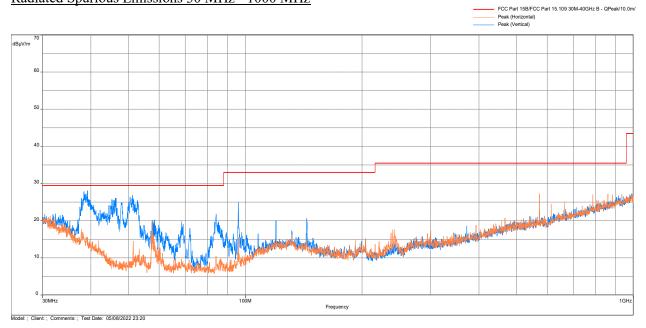


Test Results: 15.209 Radiated Spurious Emissions Mid Channel, Tx at 2440MHz, Radio 2



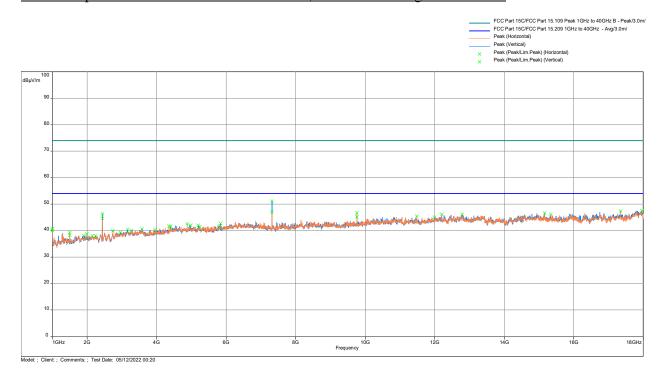


Radiated Spurious Emissions 30 MHz - 1000 MHz

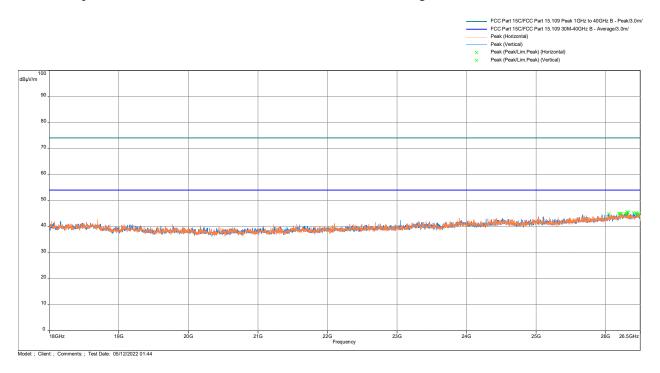




Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 73 of 83



Total	Ouality.	Assured.
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Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(µV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
38.407	27.84	29.5	-1.66	0.98	3.25	Vertical	-12.15
39.247	28.07	29.5	-1.43	0.98	359.75	Vertical	-12.79
46.296	26.11	29.5	-3.39	0.98	359.75	Vertical	-17.61
50.532	26.43	29.5	-3.07	4	302.5	Vertical	-19.34
51.275	26.88	29.5	-2.62	2	136.75	Vertical	-19.53

Freq. MHz	Peak@3m dB(uV/m)	Avg Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
7319.467	51.06	54	-2.94	1.49	349.5	Vertical	-4.09
7319.467	46.91	54	-7.09	1.99	51.25	Horizontal	-4.09
9761.233	46.74	54	-7.26	1.99	294.5	Horizontal	-1.72
9761.233	45.17	54	-8.83	1.99	13.25	Vertical	-1.72

Note: FS = RA + Correction

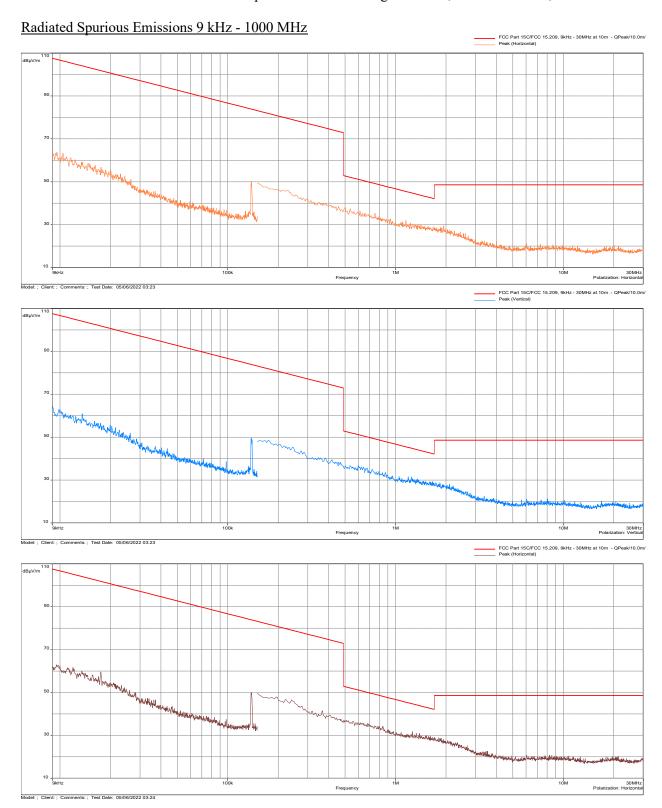
Correction = AF + CF - Preamp

Dogulta	Complies	
Results	Complies	

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 74 of 83

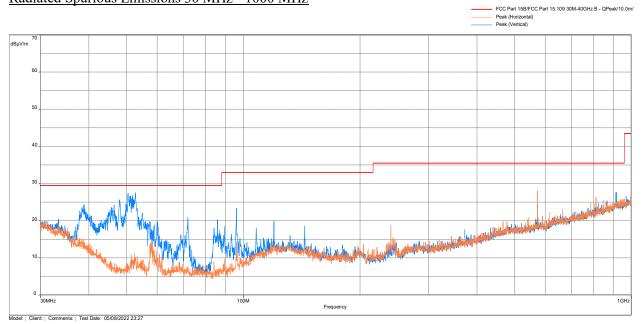


Test Results: 15.209 Radiated Spurious Emissions High Channel, Tx at 2479MHz, Radio 2





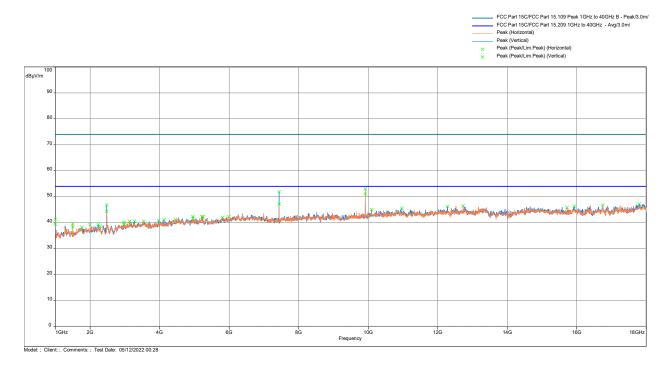
Radiated Spurious Emissions 30 MHz - 1000 MHz



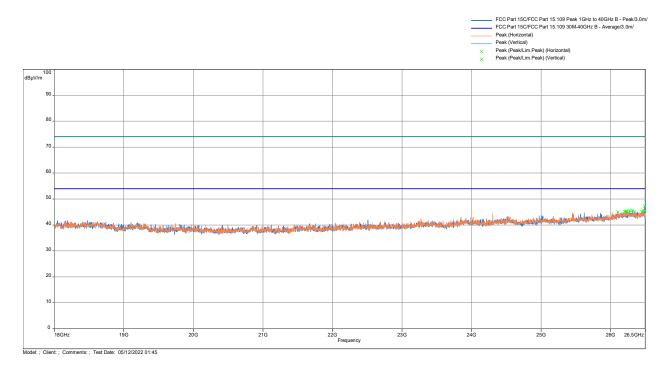
EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 76 of 83



Radiated Spurious Emissions 1000 - 18000 MHz, Peak Scan vs Avg & Peak Limit



Radiated Spurious Emissions 18000 - 26000 MHz, Peak Scan vs Avg & Peak Limit



EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 77 of 83



Total	Ouality.	Assured.
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Frequency MHz	QP@10m dB(μV/m)	Limit@10m dB(µV/m)	Margin dB	Height m	Angle deg	Polarization	Correction (dB)
48.010	25.66	29.5	-3.84	1	321	Vertical	-18.52
50.499	27.38	29.5	-2.12	2	353.25	Vertical	-19.33
51.599	26.05	29.5	-3.45	4	250	Vertical	-19.59
51.825	26.74	29.5	-2.76	3	171	Vertical	-19.63
52.730	27.56	29.5	-1.94	3	180.5	Vertical	-19.8

Freq. MHz	Peak@3m dB(uV/m)	Avg Limit@3m dB(µV/m)	Margin dB	Height m	Azimuth deg	Polarity	Correction dB
7436.200	47.08	54	-6.92	1.01	71	Horizontal	-3.88
7437.333	51.8	54	-2.2	1.49	346.25	Vertical	-3.88
9914.800	51.08	54	-2.92	1.99	359.75	Vertical	-1.54
9917.067	52.97	54	-1.03	1.99	294.75	Horizontal	-1.53

Note: FS = RA + Correction

Correction = AF + CF - Preamp

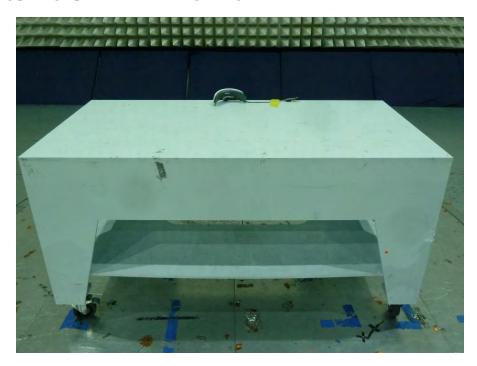
Results	Complies
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EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 78 of 83



4.5.7 Test Setup Configuration

The following photographs show the testing configurations used.







4.5.8 Test Setup Configuration (Continued)

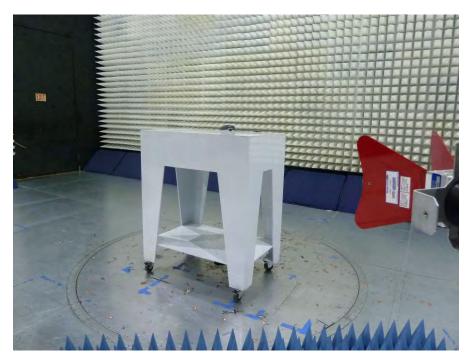


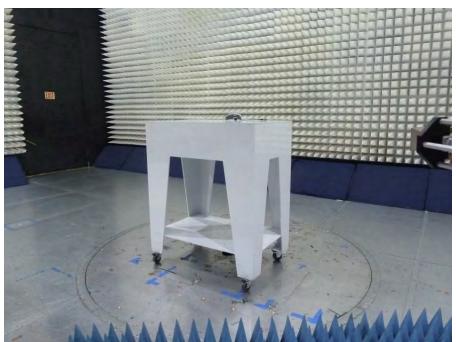


EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)
File: 105041185MPK-001 Page 80 of 83



4.5.8 Test Setup Configuration (Continued)







5.0 List of Test Equipment

Measurement equipment used for emission compliance testing utilized the equipment on the following list:

Equipment	Manufacturer	Model/Type	Asset #	Cal Int	Cal Due
EMI Receiver	Rohde & Schwarz	ESU40	ITS 00961	12	03/10/23
Passive Loop Antenna	EMCO	6512	ITS 001598	12	06/21/22
Pre-Amplifier (18-40GHz)	Miteq	TTA1840-35-S-M	ITS 01393	12	03/14/23
Active Horn Antenna	ETS-Lindgren	3117-PA	ITS 01365	12	05/04/23
Pyramidal Horn Antenna	EMCO	3160-09	ITS 00571	#	#
Bilog Antenna 30-1000MHz	SunAR RF Motion	JB1	ITS 01577	12	02/10/23
Pre-Amplifier	Sonoma Instrument	310	ITS 00942	12	04/25/23
RF Cable	Mega Phase	TM40-K1K1-59	ITS 01655	12	01/11/23
RF Cable	Mega Phase	TM40-K1K1-19	ITS 01155	12	04/25/23
Notch Filter	MICRO-TRONICS	BRM50702	ITS 01166	12	06/29/22
RF Cable	Mega Phase	EMC1-K1K1-236	ITS 01484	12	06/29/22
10m chamber	Panashield	10m Semi-	ITS 00984	36	07/29/23

[#] No Calibration required

Software used for emission compliance testing utilized the following:

Name	Manufacturer	Version	Template/Profile	
Tile	Quantum Change	3.4.K.22	Conducted Spurious_30M-26GHz	
BAT-EMC	Nexio	3.17.0.10	103902894_Penumbra.bpp	
RS Commander	Rohde Schwarz	1.6.4	Not Applicable (Screen grabber)	

EMC Report for Penumbra, Inc. on the All-In-One Head Mounted Display (Part Number: 19135)

File: 105041185MPK-001 Page 82 of 83



Document History 6.0

Revision/ Job Number	Writer Initials	Reviewers Initials	Date	Change
1.0 / G105041185	AC	ML	June 10, 2022	Original document
2.0 / G105041185	AC	ML	April 03, 2023	-Added CAB idAdded PMN/HVIN/FVIN information in section 2.1 -Updated lot number in Section 3.2 per customerFixed title on plots 4.8, 4.9 and 4.10.

Page 83 of 83