

# ELECTROMAGNETIC EMISSION COMPLIANCE REPORT FOR LOW-POWER, NON-LICENSED TRANSMITTER

**Test Report No.** : OT-180-RWD-052  
**AGR No.** : A189A-123  
**Applicant** : ELRETRON INC.  
**Address** : 1206, 16, Digital-ro 32gil, Guro-gu, Seoul, Republic of Korea  
**Manufacturer** : ELRETRON INC.  
**Address** : 1206, 16, Digital-ro 32gil, Guro-gu, Seoul, Republic of Korea  
**Type of Equipment** : PENNA RF Pointer  
**FCC ID.** : 2AQWK-PENNAPOINTER  
**Model Name** : PENNA Pointer  
**Multiple Model Name** : N/A  
**Serial number** : N/A  
**Total page of Report** : 29 pages (including this page)  
**Date of Incoming** : August 31, 2018  
**Date of issue** : October 25, 2018

## SUMMARY

The equipment complies with the regulation; *FCC PART 15 SUBPART C Section 15.247*

This test report only contains the result of a single test of the sample supplied for the examination.

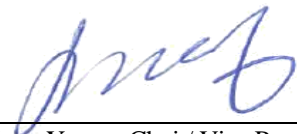
It is not a generally valid assessment of the features of the respective products of the mass-production.

Reviewed by:



Jae-Ho Lee / Chief Engineer  
ONETECH Corp.

Approved by:



Keun-Young, Choi / Vice President  
ONETECH Corp.

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### Revision History

Rev. No.	Issue Report No.	Issued Date	Revisions	Section Affected
0	OT-18O-RWD-052	October 25, 2018	Initial Issue	All

## 1. VERIFICATION OF COMPLIANCE

Applicant : ELRETRON INC.  
 Address : 1206, 16, Digital-ro 32gil, Guro-gu, Seoul, Republic of Korea  
 Contact Person : Da Geun Lee / CTO  
 Telephone No. : +82-10-4716-1720  
 FCC ID : 2AQWK-PENNAPOINTER  
 Model Name : PENNA Pointer  
 Serial Number : N/A  
 Date : October 25, 2018

EQUIPMENT CLASS	DTS – DIGITAL TRNSMISSION SYSTEM
KIND OF EQUIPMENT	PENNA RF Pointer
THIS REPORT CONCERNS	Original Grant
MEASUREMENT PROCEDURES	ANSI C63.10: 2013
TYPE OF EQUIPMENT TESTED	Pre-Production
KIND OF EQUIPMENT AUTHORIZATION REQUESTED	Certification
EQUIPMENT WILL BE OPERATED UNDER FCC RULES PART(S)	FCC PART 15 SUBPART C Section 15.247
Modifications on the Equipment to Achieve Compliance	None
Final Test was Conducted On	3 m, Semi Anechoic Chamber

-. The above equipment was tested by ONETECH Corp. for compliance with the requirement set forth in the FCC Rules and Regulations. This said equipment in the configuration described in this report, shows the maximum emission levels emanating from equipment are within the compliance requirements.

## 2. TEST SUMMARY

### 2.1 Test items and results

SECTION	TEST ITEMS	RESULTS
15.247 (a) (2)	Minimum 6 dB Bandwidth	Met the Limit / PASS
15.247 (b) (3)	Maximum Peak Conducted Output Power	Met the Limit / PASS
15.247 (d)	100 kHz Bandwidth Outside the Frequency Band	Met the Limit / PASS
15.247 (d)	Radiated Emission which fall in the Restricted Band	Met the Limit / PASS
15.247 (e)	Peak Power Spectral Density	Met the Limit / PASS
15.209	Radiated Emission Limits	Met the Limit / PASS
15.207	Conducted Limits	N/A
15.203	Antenna Requirement	Met requirement / PASS

### 2.2 Additions, deviations, exclusions from standards

No additions, deviations or exclusions have been made from standard.

### 2.3 Related Submittal(s) / Grant(s)

Original submittal only

### 2.4 Purpose of the test

To determine whether the equipment under test fulfills the requirements of the regulation stated in FCC PART 15 SUBPART C Section 15.247.

### 2.5 Test Methodology

Both conducted and radiated testing was performed according to the procedures in ANSI C63.10: 2013. Radiated testing was performed at a distance of 3 m from EUT to the antenna.

### 2.6 Test Facility

The Onetech Corp. has been designated to perform equipment testing in compliance with ISO/IEC 17025.

The Electromagnetic compatibility measurement facilities are located at 43-14, Jinsaegol-gil, Chowol-eup, Gwangju-si, Gyeonggi-do, 12735, Korea

-. Site Filing:

VCCI (Voluntary Control Council for Interference) – Registration No. R-4112/ C-14617/ G-10666 / T-1842

IC (Industry Canada) – Registration No. Site# 3736A-3

-. Site Accreditation:

KOLAS (Korea Laboratory Accreditation Scheme) - Accreditation NO. KT085

FCC (Federal Communications Commission) - Accreditation No. KR0013

RRA (Radio Research Agency) – Designation No. KR0013

### 3. GENERAL INFORMATION

#### 3.1 Product Description

The ELRETRON INC., Model PENNA Pointer (referred to as the EUT in this report) is an PENNA RF Pointer. The product specification described herein was obtained from product data sheet or user's manual.

DEVICE TYPE	PENNA RF Pointer
OPERATING FREQUENCY	2 445 MHz ~ 2 455 MHz
RF OUTPUT POWER	-5.20 dBm
NUMBER OF CHANNEL	3 Channels
MODULATION TYPE	GFSK
ANTENNA TYPE	PCB Antenna
ANTENNA GAIN	3.63 dBi
LIST OF EACH OSC. OR CRYSTAL. FREQ.(FREQ.>=1 MHz)	32 MHz
RATED SUPPLY VOLTAGE	DC 3.7 V

#### 3.2 Alternative type(s)/model(s); also covered by this test report.

-. None

### 4. EUT MODIFICATIONS

-. None

## 5. SYSTEM TEST CONFIGURATION

### 5.1 Justification

This device was configured for testing in a typical way as a normal customer is supposed to be used. During the test, the following components were installed inside of the EUT.

DEVICE TYPE	MANUFACTURER	MODEL/PART NUMBER	FCC ID
Main Board	N/A	N/A	-
USB Dongle	ELRETRON INC.	N/A	-

### 5.2 Peripheral equipment

Defined as equipment needed for correct operation of the EUT, but not considered as tested:

Model	Manufacturer	Description	Connected to
G6-1121TV	HP	Notebook PC	EUT, AC/DC Adapter
PPP009C	HP	AC/DC Adapter	Notebook PC

### 5.3 Mode of operation during the test

For the testing, software used to control the EUT for staying in continuous transmitting is programmed.

For final testing, the EUT was set at 2 445 MHz, 2 450 MHz, and 2 455 MHz to get a maximum emission levels from the EUT. The EUT was moved throughout the XY, XZ, and YZ planes and the worst case is “XY” axis, but the worst data was recorded in this report.



### 5.4 Configuration of Test System

**Radiated Emission Test:** Preliminary radiated emissions test were conducted using the procedure in ANSI C63.10: 2013 to determine the worse operating conditions. Final radiated emission tests were conducted at 3 meter Semi Anechoic Chamber.

The turntable was rotated through 360 degrees and the EUT was tested by positioned three orthogonal planes to obtain the highest reading on the field strength meter. Once maximum reading was determined, the search antenna was raised and lowered in both vertical and horizontal polarization.

### 5.5 Antenna Requirement

For intentional device, according to section 15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device.

**Antenna Construction:**

The antenna of the EUT is a PCB Antenna on the main board in the EUT, so no consideration of replacement by the user.

## 6. PRELIMINARY TEST

### 6.1 AC Power line Conducted Emissions Tests

As this product is only using DC power, AC conducted emission test has not been performed.

### 6.2 General Radiated Emissions Tests

During Preliminary Tests, the following operating modes were investigated

Operation Mode	The Worse operating condition (Please check one only)
Transmitting and Changing Mode	X

## 7. MIMIMUM 6 dB BANDWIDTH

### 7.1 Operating environment

Temperature : 24 °C  
 Relative humidity : 44 % R.H.

### 7.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer. The resolution bandwidth is set to 100 kHz, and peak detection was used. The 6 dB bandwidth is defined as the total spectrum over which the power is higher than the peak power minus 6 dB.



### 7.3 Test equipment used

Model Number	Manufacturer	Description	Serial Number	Last Cal.
■ - FSV30	Rohde & Schwarz	Signal Analyzer	101200	Aug.23, 2018 (1Y)

All test equipment used is calibrated on a regular basis.

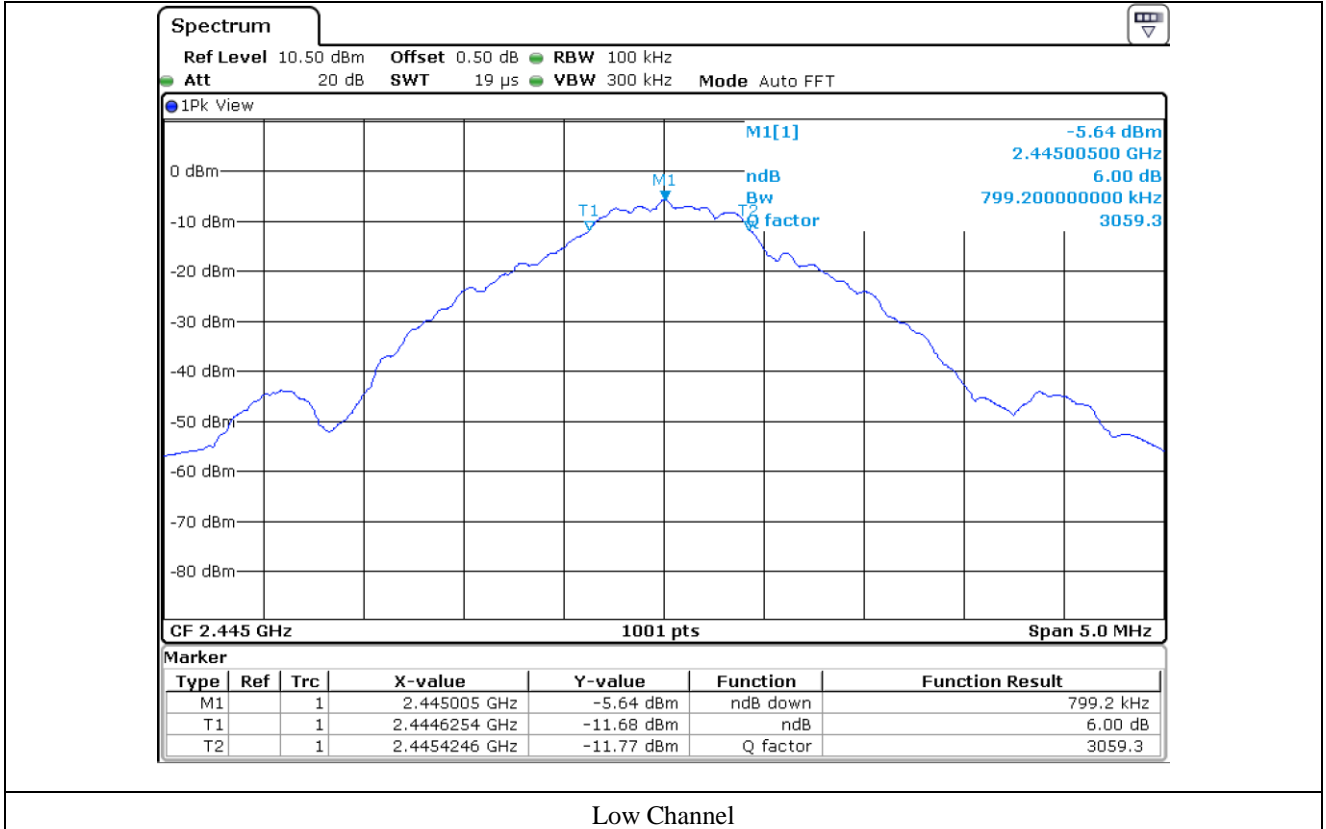
**7.4 Test data**

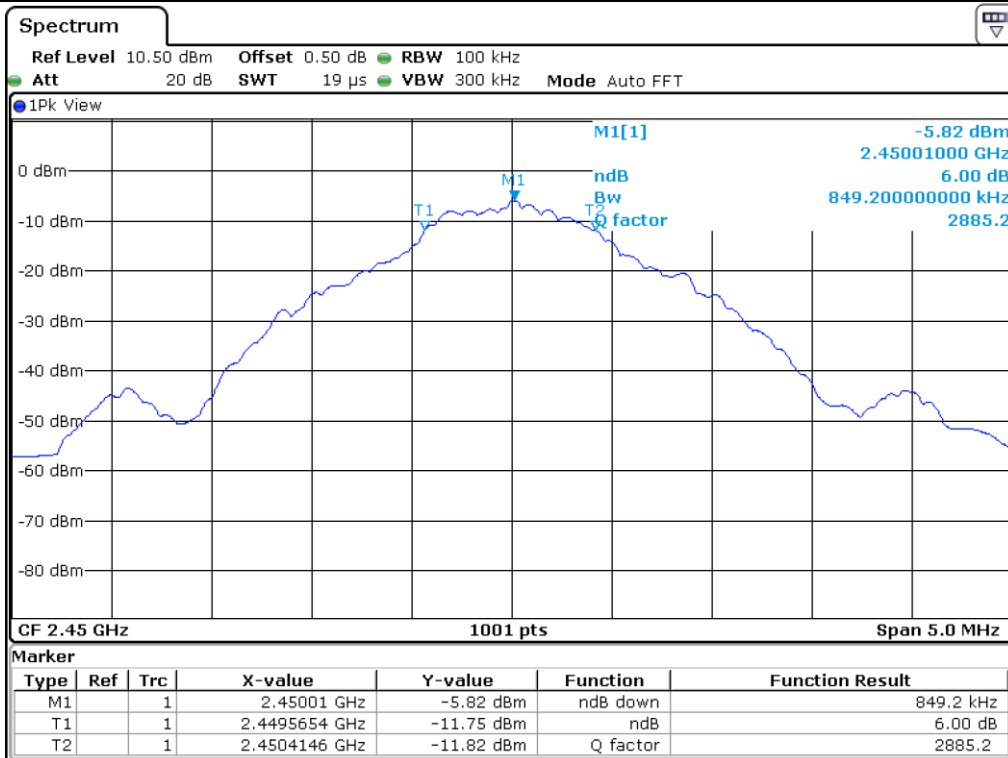
- Test Date : October 18, 2018
- Test Result : Pass

CHANNEL	FREQUENCY(MHz)	MEASURED VALUE (kHz)	LIMIT (kHz)	MARGIN (kHz)
Low	2 445.00	799.20	500	299.20
Middle	2 450.00	849.20	500	349.20
High	2 455.00	839.20	500	339.20

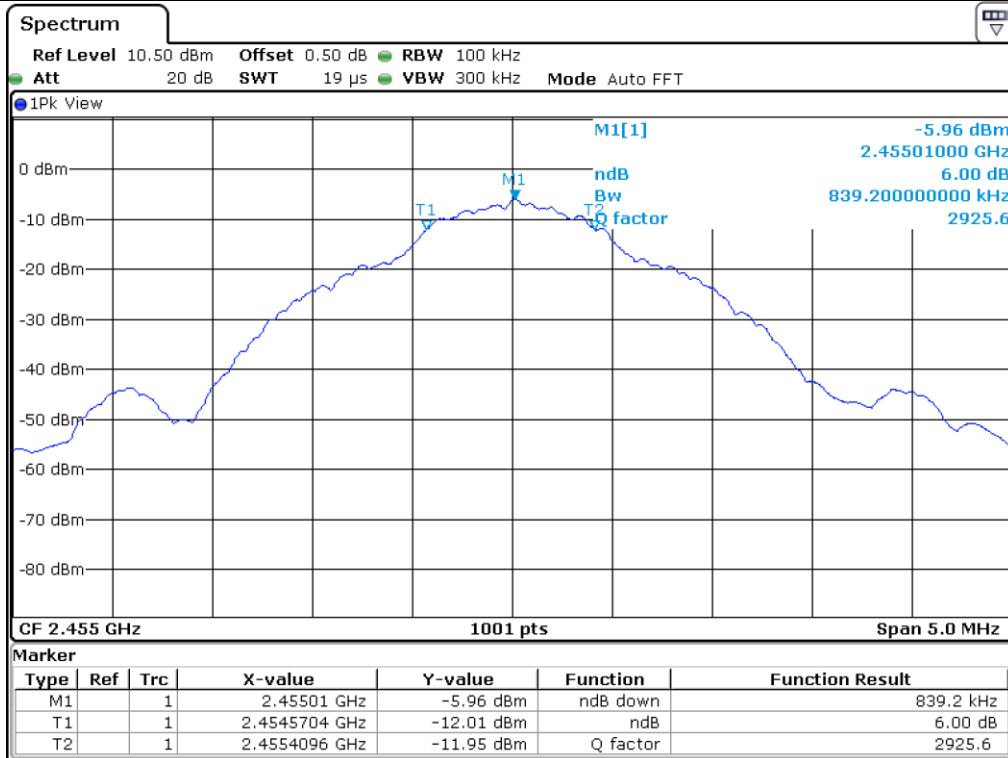
Remark. Margin = Measured Value - Limit

Tested by: Min-Gu, Ji / Assistant Manager





Middle Channel



High Channel

## 8. MAXIMUM PEAK OUTPUT POWER

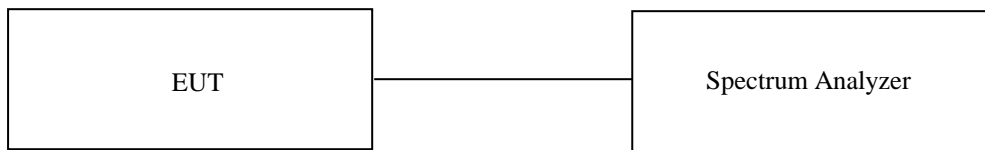
### 8.1 Operating environment

Temperature : 24 °C  
 Relative humidity : 44 % R.H.

### 8.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer.

The resolution bandwidth is set to  $\geq$  DTS Bandwidth, the video bandwidth is set to 3 times the resolution bandwidth.



### 8.3 Test equipment used

Model Number	Manufacturer	Description	Serial Number	Last Cal.
■ - FSV30	Rohde & Schwarz	Signal Analyzer	101200	Aug.23, 2018 (1Y)

All test equipment used is calibrated on a regular basis.

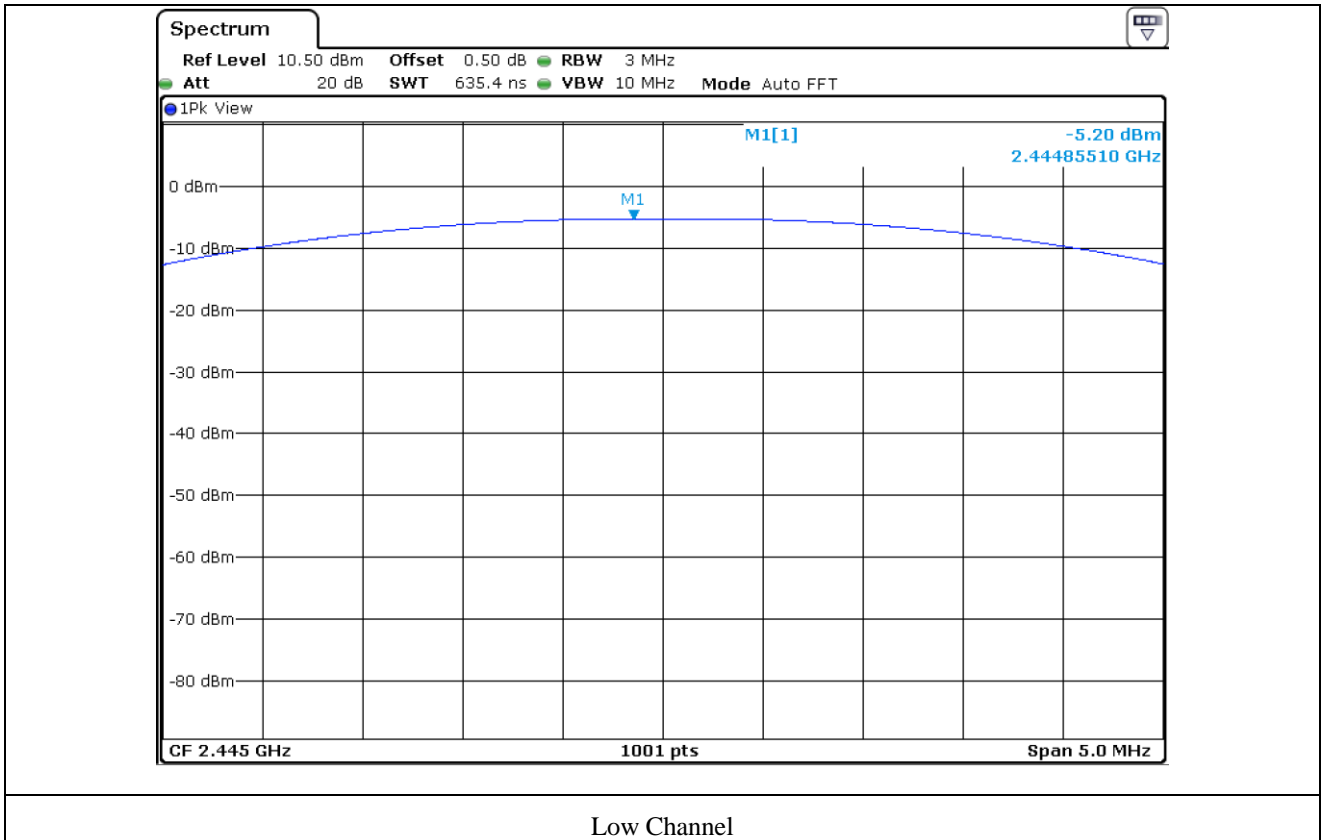
**8.4 Test data**

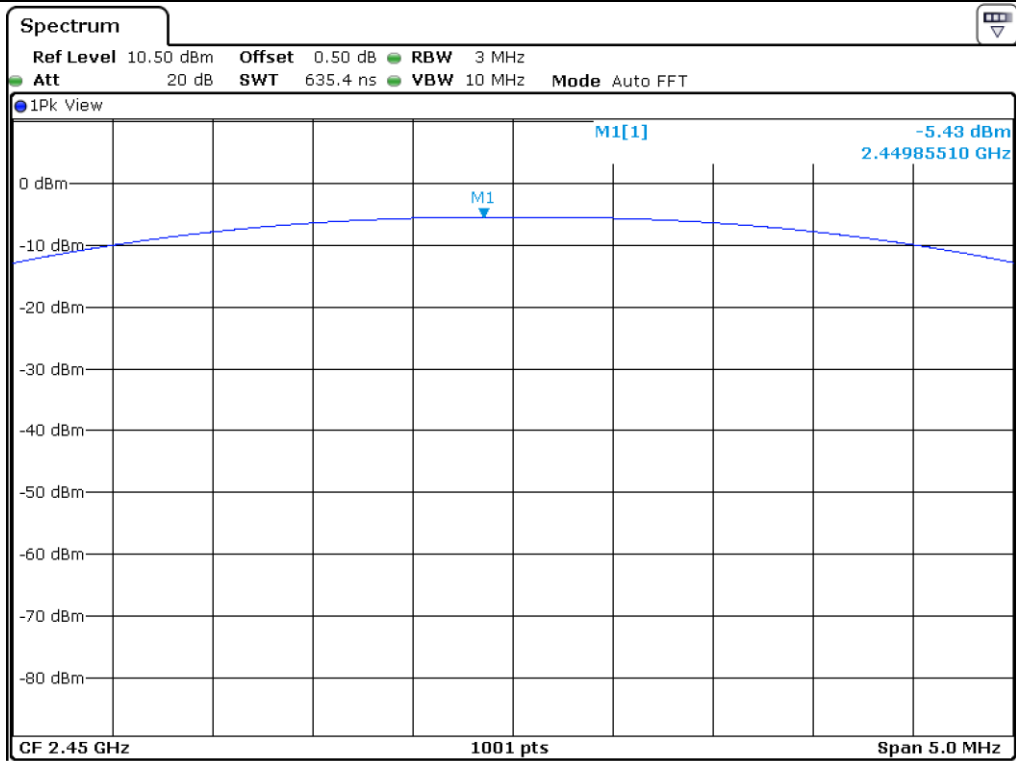
- Test Date : October 18, 2018
- Test Result : Pass

CHANNEL	FREQUENCY (MHz)	MEASURED VALUE (dBm)	LIMIT (dBm)	MARGIN (dB)
LOW	2 445.00	-5.20	30.00	35.20
MIDDLE	2 450.00	-5.43	30.00	35.43
HIGH	2 455.00	-5.54	30.00	35.54

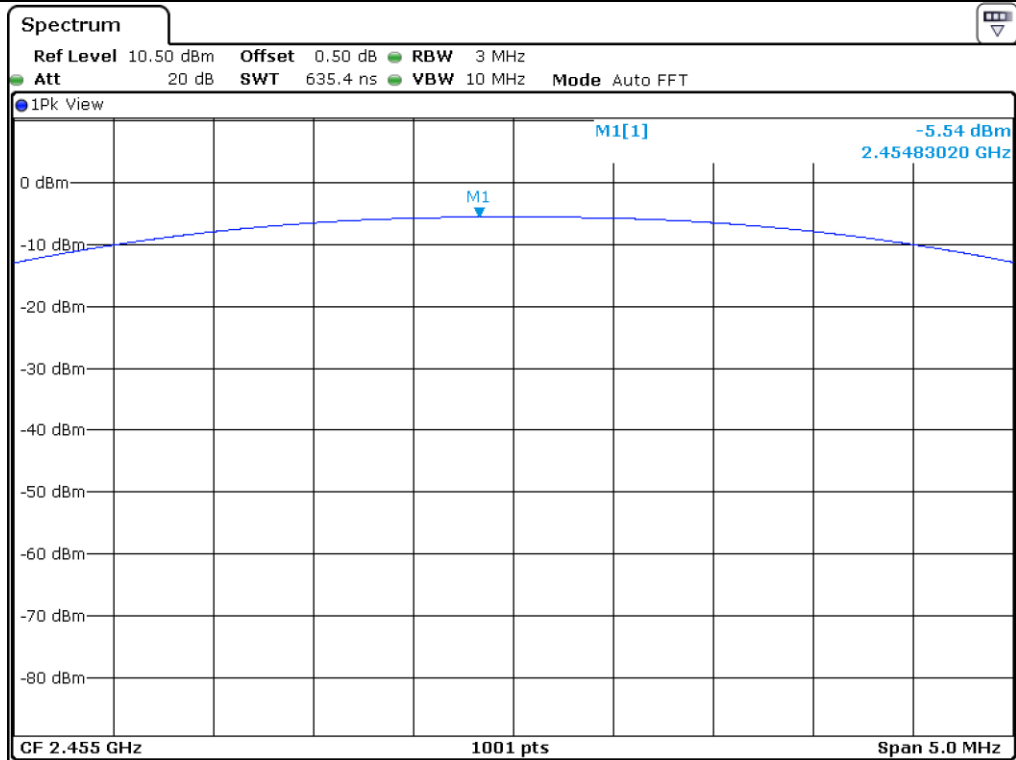
Remark. Margin = Limit – Measured Value (=Receiver Reading + Cable Loss)

**Tested by: Min-Gu, Ji / Assistant Manager**





Middle Channel



High Channel

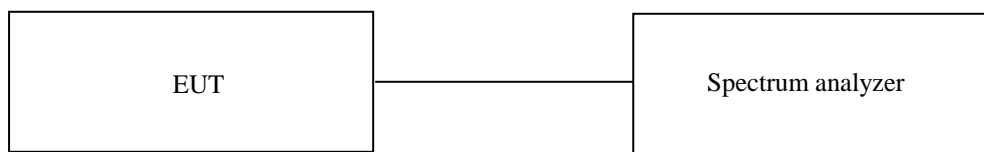
## 9. 100 kHz BANDWIDTH OUTSIDE THE FREQUENCY BAND

### 9.1 Operating environment

Temperature : 24 °C  
 Relative humidity : 44 % R.H.

### 9.2 Test set-up for conducted measurement

The antenna output of the EUT was connected to the spectrum analyzer. The resolution and video bandwidth is set to 100 kHz, and peak detection was used.



### 9.3 Test set-up for radiated measurement

The radiated emissions measurements were performed on the 3 m semi anechoic chamber. The EUT was placed on turntable approximately 1.5 m above the ground plane.

The frequency spectrum from 30 MHz to 26.5 GHz was scanned and maximum emission levels at each frequency recorded. The system was rotated 360°, and the antenna was varied in the height between 1.0 m and 4.0 m in order to determine the maximum emission levels. This procedure was performed for horizontal and vertical polarization of the receiving antenna.

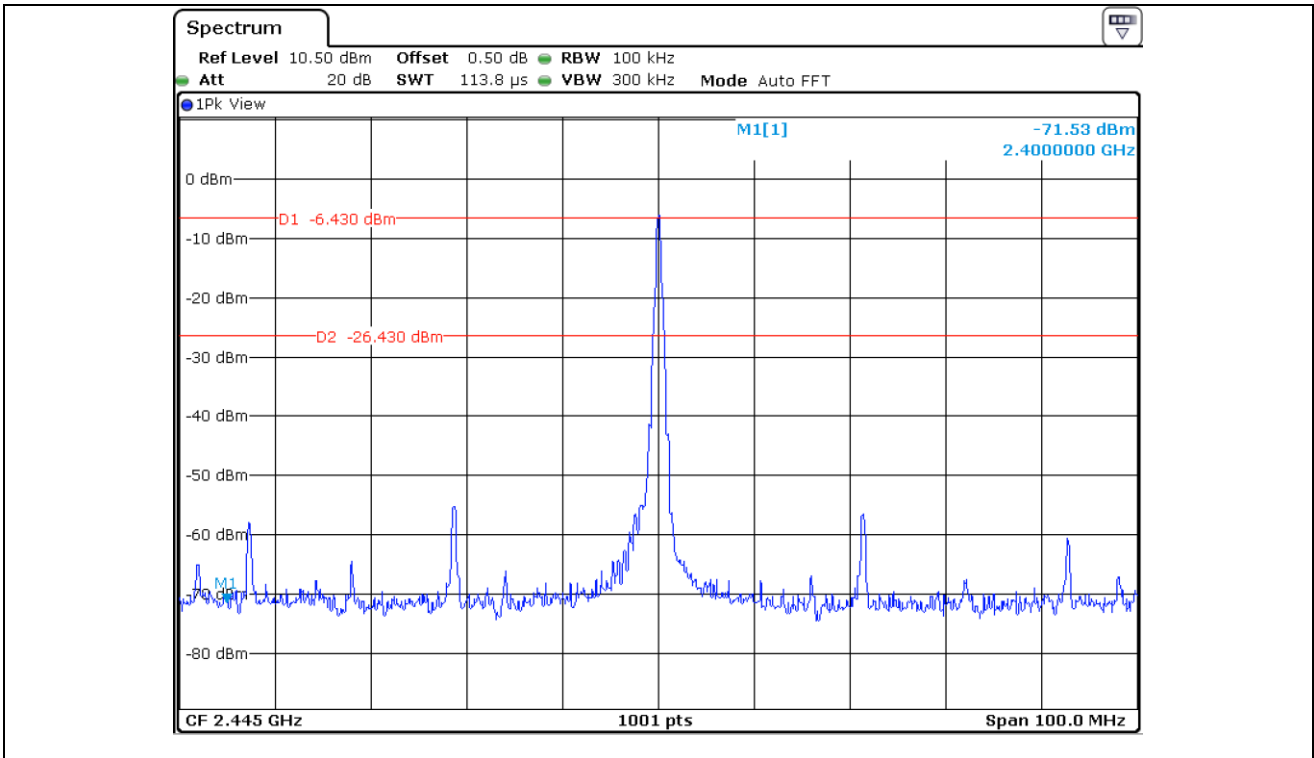
### 9.4 Test equipment used

	Model Number	Manufacturer	Description	Serial Number	Last Cal. (Interval)
■ -	ESR	Rohde & Schwarz	EMI Test Receiver	101470	Oct. 27, 2017 (1Y)
■ -	310N	Sonoma Instrument	AMPLIFIER	312544	Mar. 28, 2018 (1Y)
■ -	FSV30	Rohde & Schwarz	Signal Analyzer	101200	Aug. 23, 2018 (1Y)
■ -	BBV 9718 B	Schwarzbeck	Broadband Preamplifier	009	Mar. 16, 2018 (1Y)
■ -	MA-4000XPET	Innco Systems GmbH	Antenna Master	MA4000/509	N/A
□ -	HD100	HD GmbH	Position Controller	N/A	N/A
■ -	DT3000-3t	Innco Systems GmbH	Turn Table	N/A	N/A
□ -	FMZB 1513	Schwarzbeck	LOOP ANTENNA	1513-235	May. 13, 2018 (2Y)
■ -	VULB9163	Schwarzbeck	TRILOG Broadband Antenna	9163-202	Nov. 15, 2016 (2Y)
■ -	BBHA9120D	Schwarzbeck	Horn Antenna	BBHA9120D295	Aug. 16, 2017 (2Y)
■ -	BBHA9170	Schwarzbeck	Horn Antenna	BBHA91700179	Jul. 28, 2017 (2Y)
■ -	SCU40A	Rohde & Schwarz	Pre-Amplifier	100436	Mar. 15, 2018 (1Y)

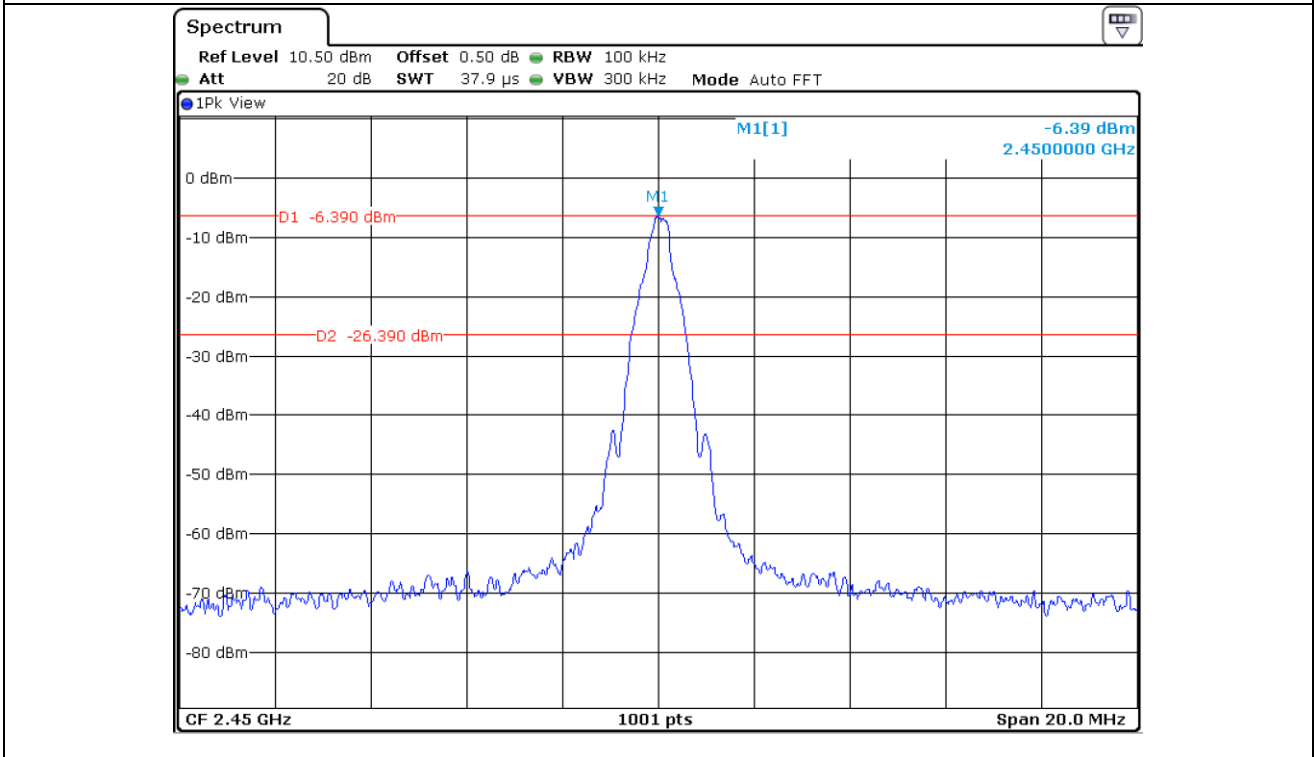
All test equipment used is calibrated on a regular basis.



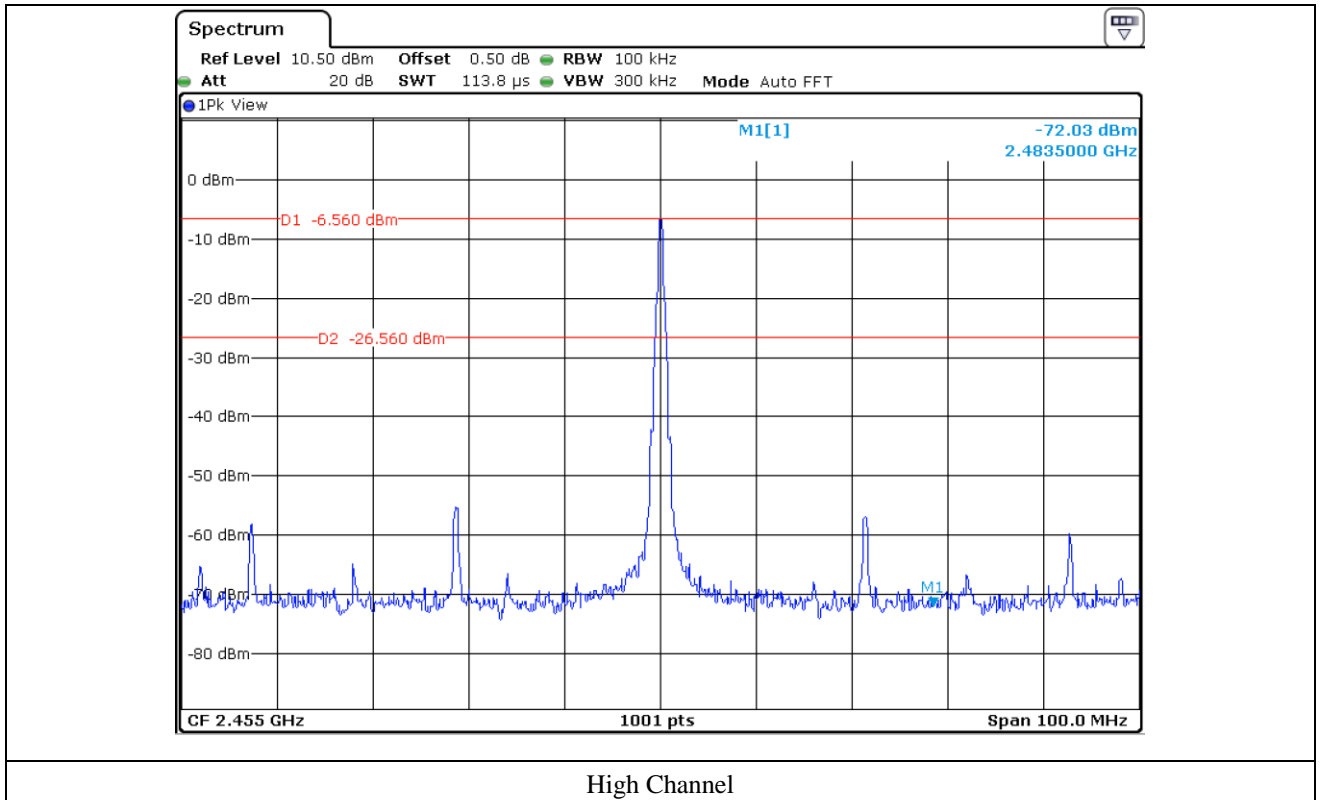
9.5 Test data for conducted emission

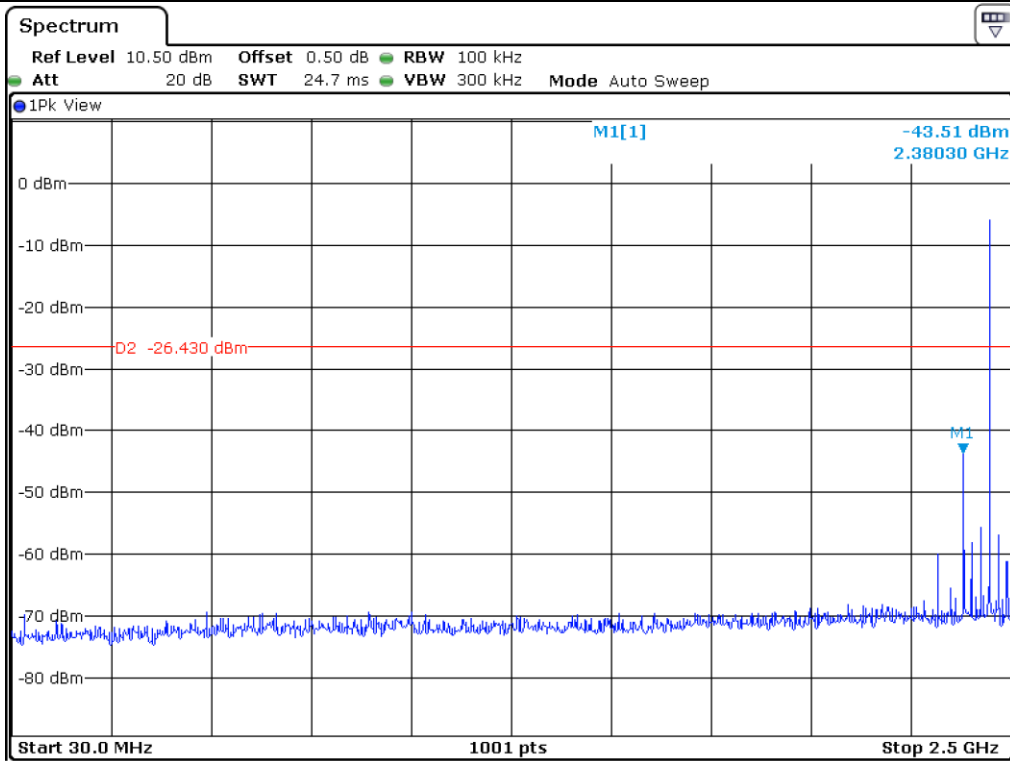


Low Channel

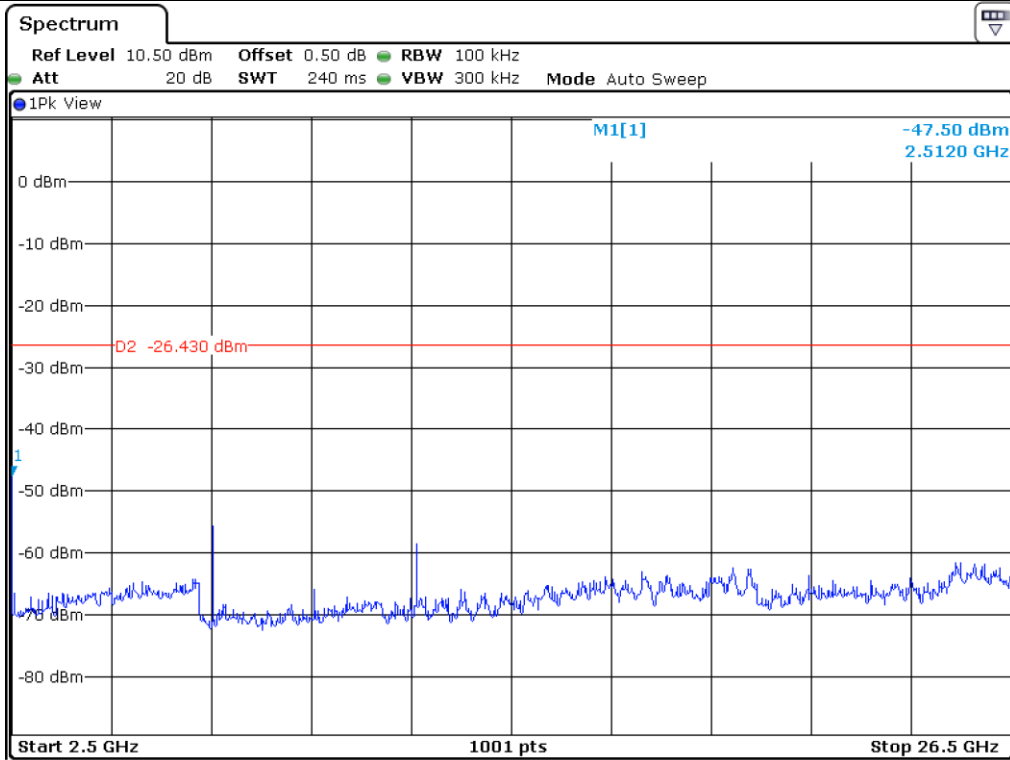


Middle Channel

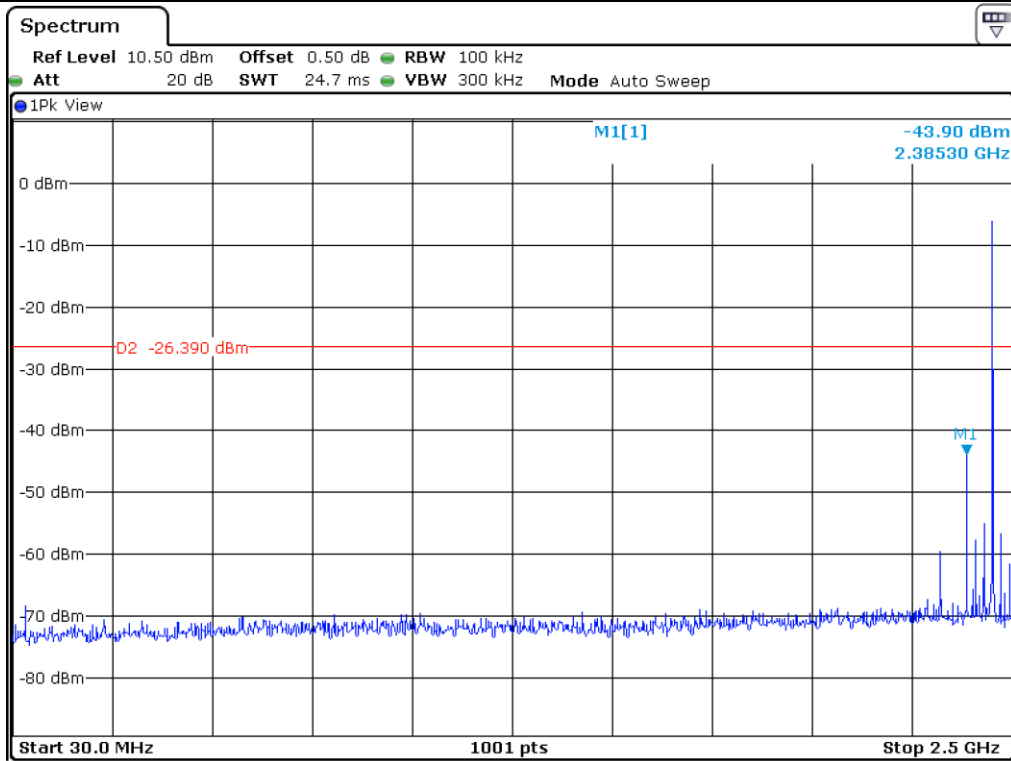




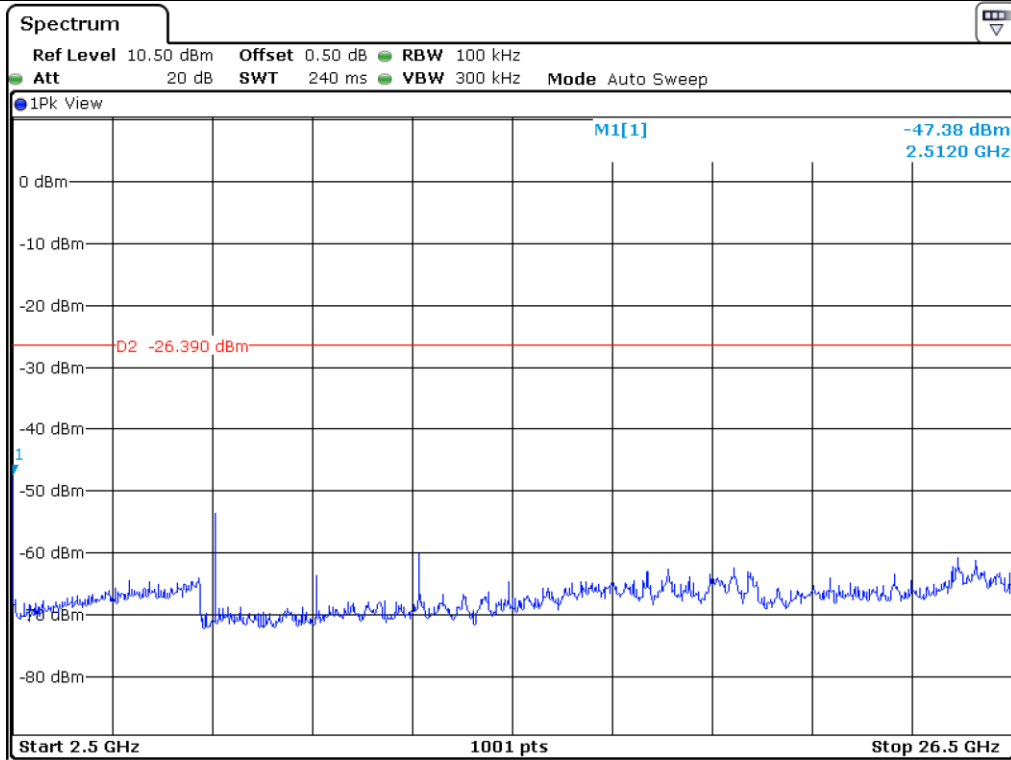
Low Channel



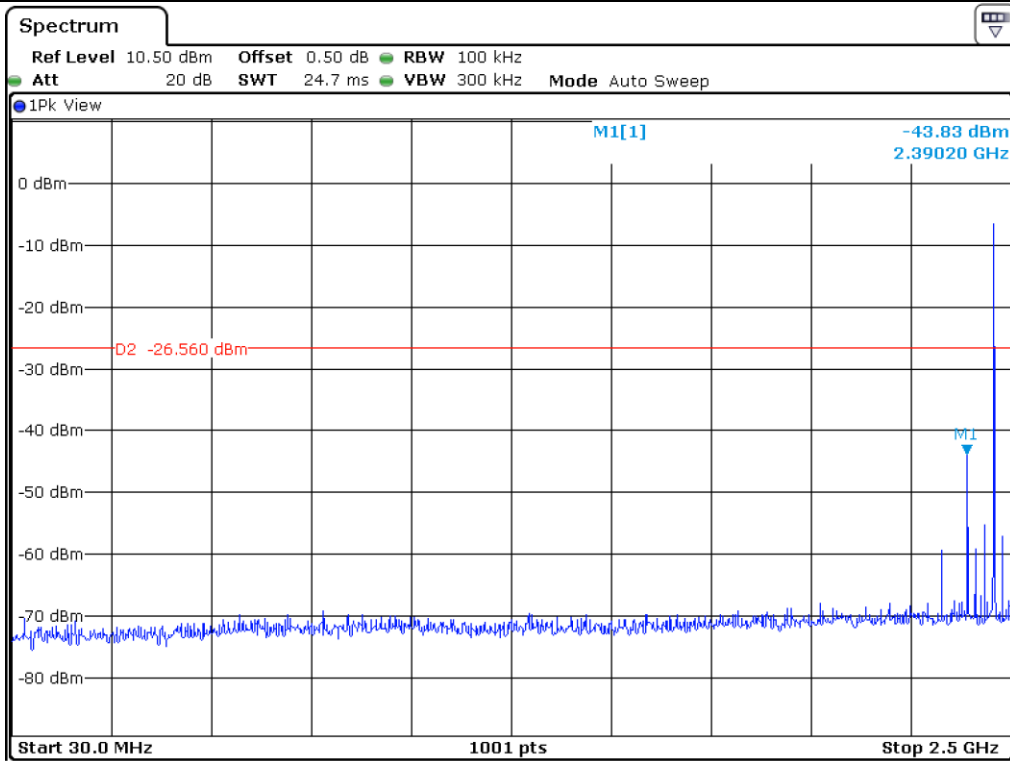
Low Channel



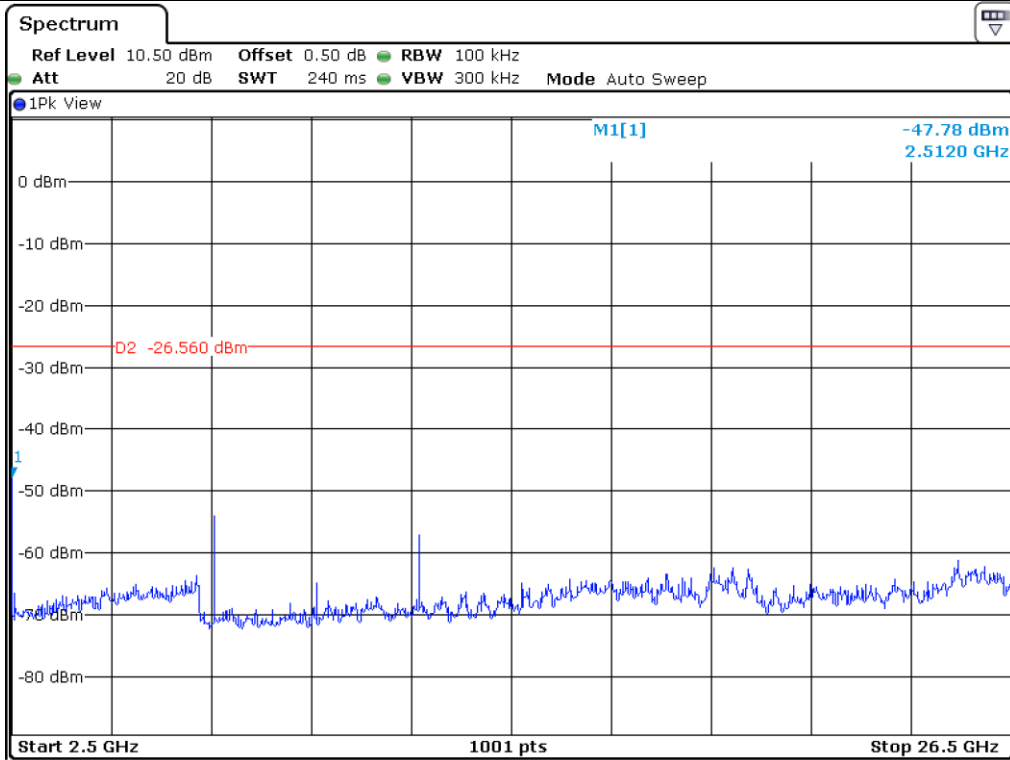
Middle Channel



Middle Channel



High Channel



High Channel

### 9.6 Test data for radiated emission

#### 9.6.1 Radiated Emission which fall in the Restricted Band

- Test Date : October 21, 2018
- Resolution bandwidth : 1 MHz for Peak and Average Mode
- Video bandwidth : 3 MHz for Peak and Average Mode
- Detector : Peak Mode(Peak), Average Mode(RMS)
- Measurement distance : 3 m
- Result : PASSED

Frequency (MHz)	Reading (dBμV)	Detector Mode	Ant. Pol. (H/V)	Ant. Factor	Cable Loss	Amp Gain	Total (dBμV/m)	Limits (dBμV/m)	Margin (dB)
<b>Test Data for Low Channel</b>									
2381.00	34.52	Peak	H	27.60	11.40	34.30	39.22	74.00	34.78
2381.00	31.01	Average	H				35.71	54.00	18.29
2315.07	31.61	Peak	V				36.31	74.00	37.69
2381.08	22.69	Average	V				27.39	54.00	26.61
<b>Test Data for High Channel</b>									
2497.70	35.09	Peak	H	27.80	11.40	34.40	39.89	74.00	34.11
2497.70	20.70	Average	H				25.50	54.00	28.50
2489.75	33.05	Peak	V				37.85	74.00	36.15
2494.73	18.80	Average	V				23.60	54.00	30.40

Tabulated test data for Restricted Band

Remark: “H”: Horizontal, “V”: Vertical

$$\text{Margin (dB)} = \text{Limits (dB}\mu\text{V/m)} - \text{Total Level (dB}\mu\text{V/m)}$$

$$\text{Total Level} = \text{Reading} + \text{Antenna Factor} + \text{Cable Loss} - \text{Pre-Amplifier Gain}$$



**Tested by: Min-Gu, Ji / Assistant Manager**

### 9.6.2 Spurious & Harmonic Radiated Emission

- Test Date : October 21, 2018
- Resolution bandwidth : 1 MHz for Peak and Average Mode
- Video bandwidth : 3 MHz for Peak and Average Mode
- Detector : Peak Mode(Peak), Average Mode(RMS)
- Frequency range : 1 GHz ~ 26.5 GHz
- Measurement distance : 3 m
- Result : PASSED

Frequency (GHz)	Reading (dBμV)	Detector Mode	Ant. Pol. (H/V)	Ant. Factor	Cable Loss	Amp Gain	Total (dBμV/m)	Limits (dBμV/m)	Margin (dB)
<b>Test Data for Low Channel</b>									
4 890.00	36.20	Peak	H	31.00	16.10	35.27	48.03	74.00	25.97
	25.27	Average	H				37.10	54.00	16.90
	31.59	Peak	V				43.42	74.00	30.58
	18.27	Average	V				30.10	54.00	23.90
<b>Test Data for Middle Channel</b>									
4 900.00	35.80	Peak	H	31.10	16.10	35.27	47.73	74.00	26.27
	26.56	Average	H				38.49	54.00	15.51
	31.79	Peak	V				43.72	74.00	30.28
	16.50	Average	V				28.43	54.00	25.57
<b>Test Data for High Channel</b>									
4 910.00	34.69	Peak	H	31.20	16.10	35.27	46.72	74.00	27.28
	26.77	Average	H				38.80	54.00	15.20
	31.41	Peak	V				43.44	74.00	30.56
	21.00	Average	V				33.03	54.00	20.97

Tabulated test data for Restricted Band

Remark: "H": Horizontal, "V": Vertical

$$\text{Margin (dB)} = \text{Limits (dB}\mu\text{V/m)} - \text{Total Level (dB}\mu\text{V/m)}$$

$$\text{Total Level} = \text{Reading} + \text{Antenna Factor} + \text{Cable Loss} - \text{Pre-Amplifier Gain}$$



**Tested by: Min-Gu, Ji / Assistant Manager**

## 10. PEAK POWER SPECTRAL DENSITY

### 10.1 Operating environment

Temperature : 24 °C  
 Relative humidity : 44 % R.H.

### 10.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer.

The resolution bandwidth is set to  $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$  , the video bandwidth is set to 3 times the resolution bandwidth.



### 10.3 Test equipment used

Model Number	Manufacturer	Description	Serial Number	Last Cal.
■ - FSV30	Rohde & Schwarz	Signal Analyzer	101200	Aug.23, 2018 (1Y)

All test equipment used is calibrated on a regular basis.



**10.4 Test data**

-. Test Date : October 18, 2018

-. Test Result : Pass

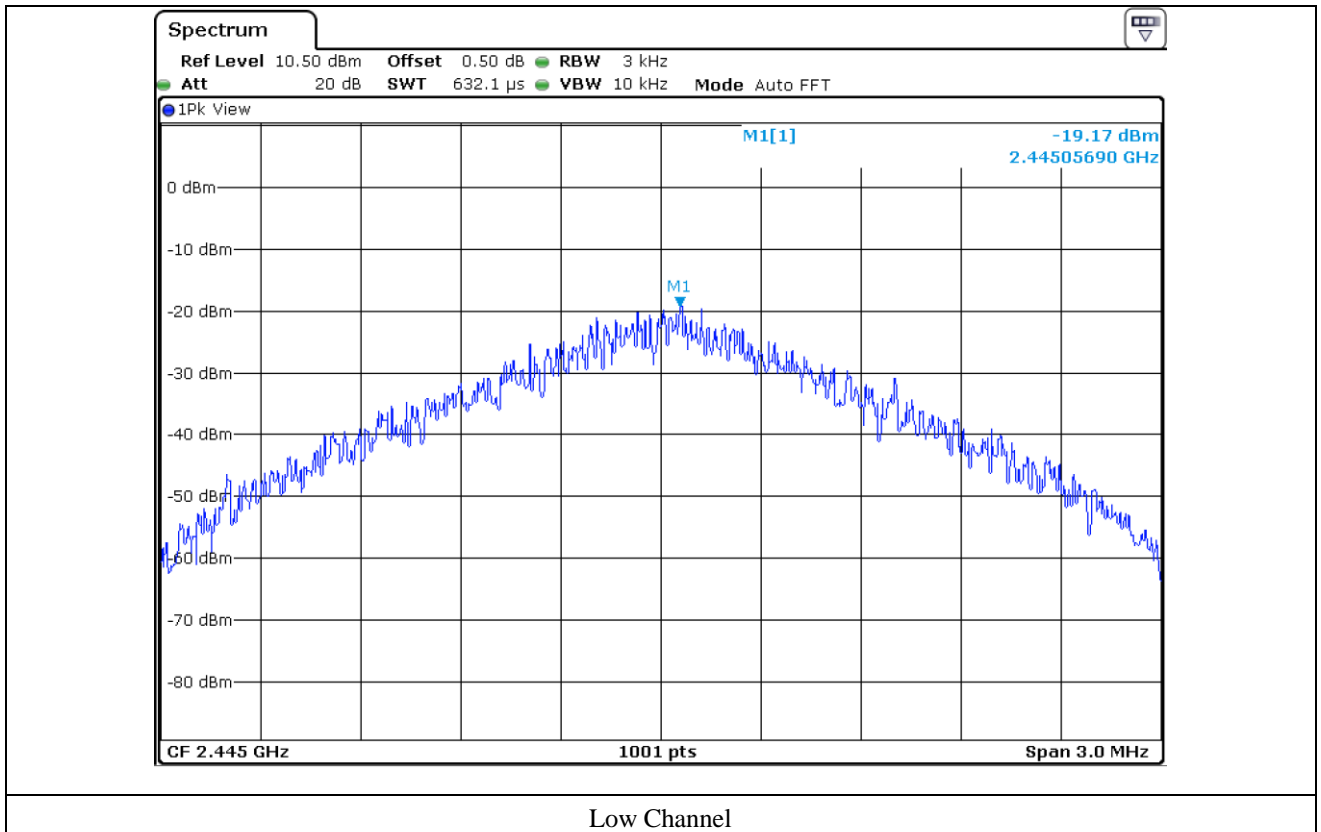
-. Operating Condition : Continuous transmitting mode

CHANNEL	FREQUENCY(MHz)	MEASURED VALUE (dBm)	LIMIT (dBm)	MARGIN (dB)
Low	2 445.00	-19.17	8.00	27.17
Middle	2 450.00	-19.38	8.00	27.38
High	2 455.00	-19.77	8.00	27.77

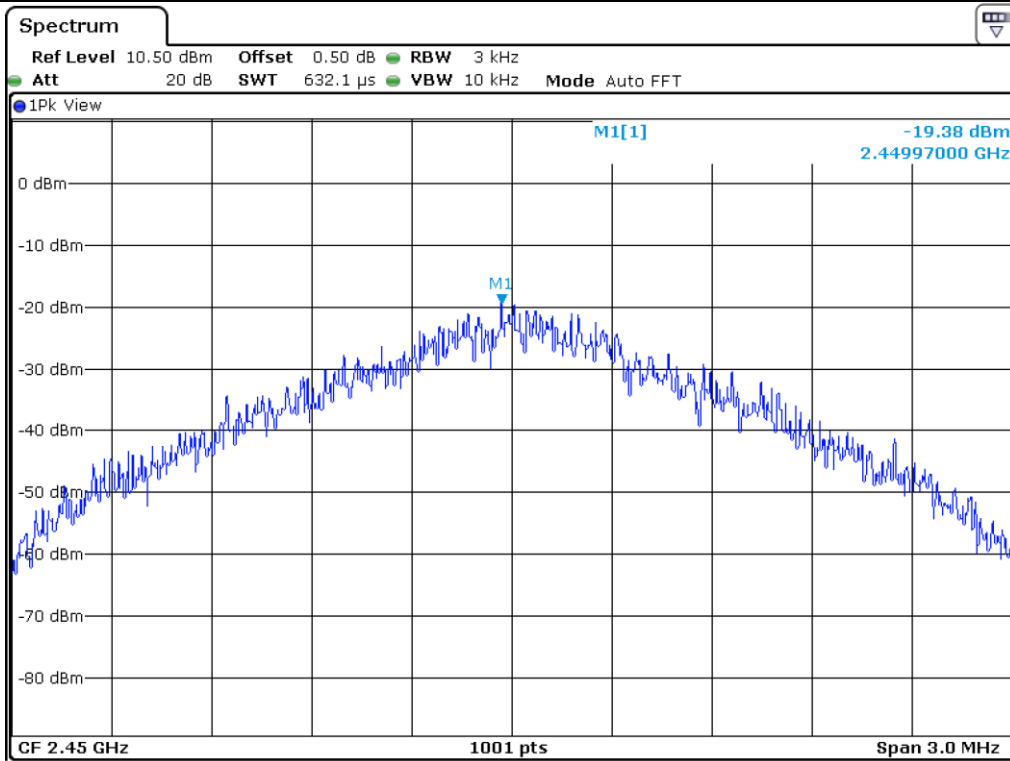
Remark. Margin = Limit – Measured value

*DZ*

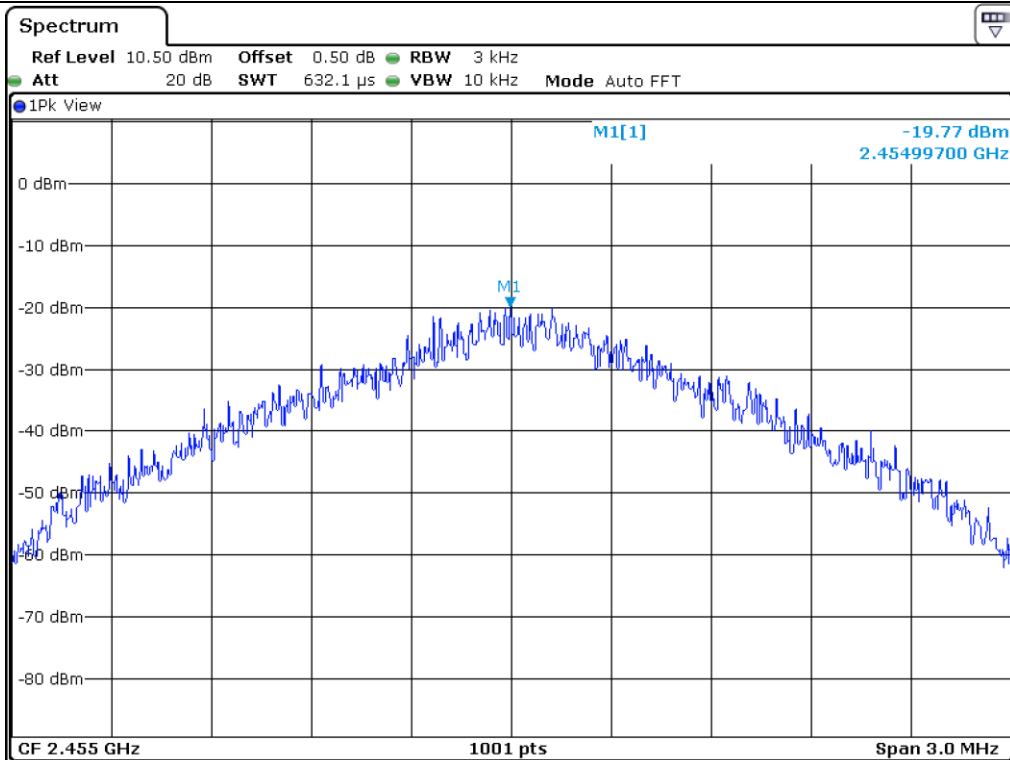
**Tested by: Min-Gu, Ji / Assistant Manager**



Low Channel



Middle Channel



High Channel

## 11. RADIATED EMISSION TEST

### 11.1 Operating environment

Temperature : 24 °C  
 Relative humidity : 52 % R.H.

### 11.2 Test set-up

The radiated emissions measurements were on the 3 m semi anechoic chamber. The EUT and other support equipment were placed on a non-conductive turntable above the ground plane. The interconnecting cables from outside test site were inserted into ferrite clamps at the point where the cables reach the turntable.

The frequency spectrum from 30 MHz to 26.5 GHz was scanned and emission levels maximized at each frequency recorded. The system was rotated 360°, and the antenna was varied in height between 1.0 m and 4.0 m in order to determine the maximum emission levels. This procedure was performed for both horizontal and vertical polarization of the receiving antenna.

### 11.3 Test equipment used

	Model Number	Manufacturer	Description	Serial Number	Last Cal. (Interval)
■ -	ESR	Rohde & Schwarz	EMI Test Receiver	101470	Oct. 27, 2017 (1Y)
■ -	310N	Sonoma Instrument	AMPLIFIER	312544	Mar. 28, 2018 (1Y)
■ -	FSV30	Rohde & Schwarz	Signal Analyzer	101200	Aug. 23, 2018 (1Y)
■ -	BBV 9718 B	Schwarzbeck	Broadband Preamplifier	009	Mar. 16, 2018 (1Y)
■ -	MA-4000XPET	Innco Systems GmbH	Antenna Master	MA4000/509	N/A
□ -	HD100	HD GmbH	Position Controller	N/A	N/A
■ -	DT3000-3t	Innco Systems GmbH	Turn Table	N/A	N/A
□ -	FMZB 1513	Schwarzbeck	LOOP ANTENNA	1513-235	May. 13, 2018 (2Y)
■ -	VULB9163	Schwarzbeck	TRILOG Broadband Antenna	9163-202	Nov. 15, 2016 (2Y)
■ -	BBHA9120D	Schwarzbeck	Horn Antenna	BBHA9120D295	Aug. 16, 2017 (2Y)
■ -	BBHA9170	Schwarzbeck	Horn Antenna	BBHA91700179	Jul. 28, 2017 (2Y)
■ -	SCU40A	Rohde & Schwarz	Pre-Amplifier	100436	Mar. 15, 2018 (1Y)

All test equipment used is calibrated on a regular basis.

**11.4 Test data for Transmitting and Changing Mode**

**11.4.1 Test data for 30 MHz ~ 1 GHz**

Humidity Level : 52 % R.H. Temperature: 24 °C

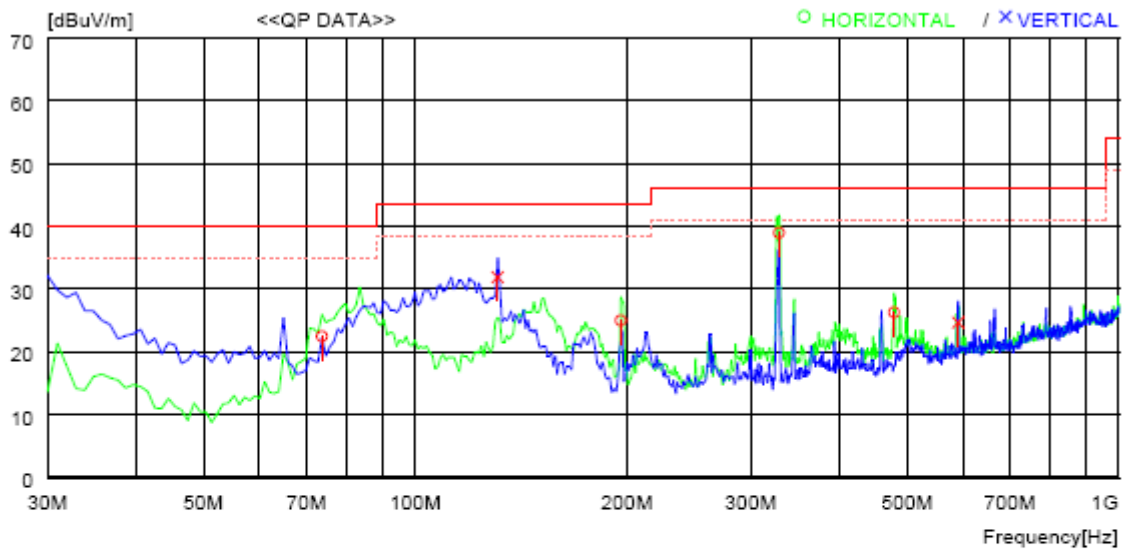
Limits apply to : FCC CFR 47, PART 15, SUBPART C, SECTION 15.247

Result : PASSED

EUT : PENNA RF Pointer

Date: October 21, 2018

Detector : CISPR Quasi-Peak (6 dB Bandwidth: 120 kHz)



No.	FREQ [MHz]	READING QP [dBuV]	ANT FACTOR [dB]	LOSS [dB]	GAIN [dB]	RESULT [dBuV/m]	LIMIT [dBuV/m]	MARGIN [dB]	ANTENNA [cm]	TABLE [DEG]
----- Horizontal -----										
1	73.650	45.3	8.4	1.9	33.1	22.5	40.0	17.5	300	120
2	195.870	44.2	10.5	3.3	33.0	25.0	43.5	18.5	200	221
3	328.760	53.6	14.2	4.2	33.0	39.0	46.0	7.0	100	0
4	479.111	37.5	16.9	5.1	33.2	26.3	46.0	19.7	100	121
----- Vertical -----										
5	130.880	53.2	9.1	2.6	33.0	31.9	43.5	11.6	100	170
6	590.658	33.4	19.0	5.6	33.3	24.7	46.0	21.3	100	359

**Tested by: Min-Gu, Ji / Assistant Manager**

**11.4.2 Test data for Below 30 MHz**

- Test Date : October 21, 2018
- Resolution bandwidth : 200 Hz (from 9 kHz to 0.15 MHz), 9 kHz (from 0.15 MHz to 30 MHz)
- Frequency range : 9 kHz ~ 30 MHz
- Measurement distance : 3 m
- Operating mode : Transmitting mode

Frequency (MHz)	Reading (dBμV)	Ant. Pol. (H/V)	Ant. Height (m)	Angle (°)	Ant. Factor (dB/m)	Cable Loss	Emission Level(dBμV/m)	Limits (dBμV/m)	Margin (dB)
Any emissions less than 20 dB below the limit were not observed.									

**11.4.3 Test data for above 1 GHz**

- Test Date : October 21, 2018
- Resolution bandwidth : 1 MHz for Peak and Average Mode
- Video bandwidth : 1 MHz for Peak Mode, 10 Hz for Average Mode
- Frequency range : 1 GHz ~ 26.5 GHz
- Measurement distance : 3 m
- Operating mode : Transmitting mode

Frequency (MHz)	Reading (dBμV)	Ant. Pol. (H/V)	Ant. Height (m)	Angle (°)	Ant. Factor (dB/m)	Cable Loss	Emission Level(dBμV/m)	Limits (dBμV/m)	Margin (dB)
Any emissions less than 20 dB below the limit were not observed.									



**Tested by: Min-Gu, Ji / Assistant Manager**