

Test report

374347-1TRFWL

Date of issue: July 2, 2019

Applicant:

Trelleborg Wheel Systems Italia S.p.A.
Via Nazionale Tiburtina 143, 00010 Tivoli RM - Italy

Product:

TPMS sensor PM9712

Model:

TPMS kit - Sensor PM9712

FCC ID:

2AUPM-TLCP01

Specifications:

◆ **FCC 47 CFR Part 15 Subpart C, §15.231(e)**

Periodic operation in the band 40.66-40.70 MHz and above 70 MHz.

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The test report merely corresponds to the tested sample.

The phase of sampling / collection of equipment under test is carried out by the customer.

Test location

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Facsimile	+39 039 220 12 21
Toll free	www.nemko.com
Website	FCC test site registration number: 682159 (10 m semi anechoic chamber)
Site number	

Tested by (name, function and signature)	G. Tepelena	(project handler)	
Reviewed by (name, function and signature)	P. Barbieri	(verifier)	
Date	July 2, 2019		

Limits of responsibility

Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report. This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contained in this report are within Nemko Spa's ISO/IEC 17025 accreditation.

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Section 1. Report summary

1.1 Applicant and manufacturer info

	Manufacturer:
Company name	Trelleborg Wheel Systems Italia S.p.A.
Address	Via Nazionale Tiburtina 143
City	Tivoli
Province/State	Roma
Postal/Zip code	00010
Country	Italy

1.2 Test specifications

FCC 47 CFR Part 15, Subpart C, Clause 15.231	Periodic operation in the band 40.66–40.70 MHz and above 70 MHz
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1.3 Test methods

ANSI C63.10 v 2013	American National Standard for Procedures for Compliance Testing of Unsilenced Wireless Devices
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1.4 Statement of compliance

Testing was performed against all relevant requirements of the test standard. Results obtained indicate that the product under test does not comply in full with the requirements tested. The test results relate only to the items tested.

See “Summary of test results” for full details.

1.5 Exclusions

None

1.6 Test report revision history

Revision #	Details of changes made to test report
374347-1TRFWL	Original report issued

Section 2. Summary of test results

2.1 FCC Part 15 Subpart C test results

Part	Test description	Verdict
§15.207(a)	Conducted limits	Not applicable ¹
§15.203	Antenna requirement	Pass ²
§15.231(e)	Conditions for intentional radiators to comply with periodic operation	Pass
§15.231(e)	Field strength of emissions	Pass
§15.231(c)	Emission bandwidth	Pass
§15.231(d)	Requirements for devices operating within 40.66–40.70 MHz band	Not applicable

Notes: ¹ The EUT is powered by internal battery

² The Antennas are located within the enclosure of EUT and not user accessible.

Section 3. Equipment under test (EUT) details

3.1 Sample information

Receipt date	July 2, 2019
Nemko sample ID number	374347-1/2

3.2 EUT information

Product name	SRD International Radiators
Model	TPMS Transmitter (434 MHz)
Serial number	374347-1/2 (Number assigned by Nemko Spa)

3.3 Technical information

Operating frequency	434.34 MHz
Modulation type	PPM
Field strength (dB μ V/m @ 3 m)	72.39
Measured BW (kHz) (99 %)	647
Emission classification (F1D, G1D, D1D)	--
Transmitter spurious, (dB μ V/m @ 3 m)	49.04, at 868.68 MHz
Power requirements	3Vdc Lithium batteries
Antenna information	The EUT uses a unique antenna coupling/ non-detachable antenna to the intentional radiator.

3.4 Product description and theory of operation

The EUT is an automated operated from tire pressure, powered by internal batteries.

3.5 EUT exercise details

The EUT is in continuous transmission mode once activation.

3.6 EUT setup diagram

EUT powered by internal batteries without I/O lines

3.7 EUT sub assemblies

The EUT is composed by a single unit

Section 4. Engineering considerations

4.1 Modifications incorporated in the EUT

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

4.2 Technical judgment

None

4.3 Deviations from laboratory tests procedures

No deviations were made from laboratory procedures.

Section 5. Test conditions

5.1 Atmospheric conditions

Temperature	18–33 °C
Relative humidity	30–60 %
Air pressure	980–1060 mbar

Test equipment used for the monitoring of the environmental conditions

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
Thermohygrometer data loggers	Testo	175-H2	20012380/305	2019-01	2021-01
Thermohygrometer data loggers	Testo	175-H2	38203337/703	2019-01	2021-01
Barometer	MSR	MSR145B	330080	2019-04	2020-04

5.2 Power supply range

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

Section 6. Measurement uncertainty

6.1 Uncertainty of measurement

EUT	Type	Test	Range and Setup features	Measurement Uncertainty	Notes
Transmitter	Conducted	Frequency error	0.001 MHz ÷ 40 GHz	0.08 ppm	(1)
		Carrier power RF Output Power	10 kHz ÷ 30 MHz	1.0 dB	(1)
			30 MHz ÷ 18 GHz	1.5 dB	(1)
			18 MHz ÷ 40 GHz	3.0 dB	(1)
		Adjacent channel power	1 MHz ÷ 18 GHz	1.6 dB	(1)
		Conducted spurious emissions	10 kHz ÷ 26 GHz	3.0 dB	(1)
			26 GHz ÷ 40 GHz	4.5 dB	(1)
		Intermodulation attenuation	1 MHz ÷ 18 GHz	2.2 dB	(1)
		Attack time – frequency behaviour	1 MHz ÷ 18 GHz	2.0 ms	(1)
		Attack time – power behaviour	1 MHz ÷ 18 GHz	2.5 ms	(1)
		Release time – frequency behaviour	1 MHz ÷ 18 GHz	2.0 ms	(1)
		Release time – power behaviour	1 MHz ÷ 18 GHz	2.5 ms	(1)
		Transient behaviour of the transmitter– Transient frequency behaviour	1 MHz ÷ 18 GHz	0.2 kHz	(1)
		Transient behaviour of the transmitter – Power level slope	1 MHz ÷ 18 GHz	9%	(1)
		Frequency deviation - Maximum permissible frequency deviation	0.001 MHz ÷ 18 GHz	1.3%	(1)
		Frequency deviation - Response of the transmitter to modulation frequencies above 3 kHz	0.001 MHz ÷ 18 GHz	0.5 dB	(1)
		Dwell time	-	3%	(1)
		Hopping Frequency Separation	0.01 MHz ÷ 18 GHz	1%	(1)
		Occupied Channel Bandwidth	0.01 MHz ÷ 18 GHz	2%	(1)
		Modulation Bandwidth	0.01 MHz ÷ 18 GHz	2%	(1)
	Radiated	Radiated spurious emissions	10 kHz ÷ 26.5 GHz	6.0 dB	(1)
			26.5 GHz ÷ 40 GHz	8.0 dB	(1)
		Effective radiated power transmitter	10 kHz ÷ 26.5 GHz	6.0 dB	(1)
			26,5 GHz ÷ 40 GHz	8.0 dB	(1)
Receiver	Radiated	Radiated spurious emissions	10 kHz ÷ 26.5 GHz	6.0 dB	(1)
			26.5 GHz ÷ 40 GHz	8.0 dB	(1)
		Sensitivity measurement	1 MHz ÷ 18 GHz	6.0 dB	(1)
	Conducted	Conducted spurious emissions	10 kHz ÷ 26 GHz	3.0 dB	(1)
			26 GHz ÷ 40 GHz	4.5 dB	(1)

(1) The reported expanded uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k = 2$ which has been derived from the assumed normal probability distribution with infinite degrees of freedom and for a coverage probability of 95 %

Section 7. Test equipment

7.1 Test equipment list

Table 7.1-1: Equipment list

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
EMI receiver (20 Hz ÷ 8 GHz)	R&S	ESU8	100202	2019-01	2020-01
EMI receiver (20 Hz ÷ 44 GHz)	R&S	ESW44	101620	2019-05	2020-05
Trilog Broadband Antenna	Schwarzbeck	VULB 9162	9162-025	2018-07	2021-07
Bilog antenna (1 ÷ 18 GHz)	Schwarzbeck	STLP 9148	9148-123	2018-07	2021-07
Antenna mast	R&S	HCM	836 529/05	NCR	NCR
Controller	R&S	HCC	836 620/7	NCR	NCR
Turning-table	R&S	HCT	835 803/03	NCR	NCR
Semi-anechoic chamber	Nemko	10m semi-anechoic chamber	530	2018-09	2021-09
Shielded room	Siemens	10m control room	1947	NCR	NCR

Note: NCR - no calibration required, VOU - verify on use

Section 8. Testing data

8.1 FCC 15.31(m) Number of frequencies

8.1.1 Definitions and limits

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

Table 8.1-1: Frequency Range of Operation

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

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

8.1.2 Test summary

Test date	July 2, 2019	Temperature	21 °C
Test engineer	G. Tepelena	Air pressure	1025 mbar
Verdict	Pass	Relative humidity	36 %

8.1.3 Observations, settings and special notes

None

8.1.4 Test data

Table 8.1-2: Test channels selection

Start of Frequency range, MHz	End of Frequency range, MHz	Frequency range bandwidth, MHz	Low channel, MHz	Mid channel, MHz	High channel, MHz
--	--	--	--	434.34	--

The EUT use only one channel

8.2 FCC 15.203 and RSS-Gen, section 6.8 Antenna requirement

8.2.1 Definitions and limits

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

8.2.2 Test summary

Test date	June 26, 2019	Temperature	25 °C
Test engineer	G. Tepelena	Air pressure	1025 mbar
Verdict	Pass	Relative humidity	36 %

8.2.3 Observations, settings and special notes

None

8.2.4 Test data

Must the EUT be professionally installed?

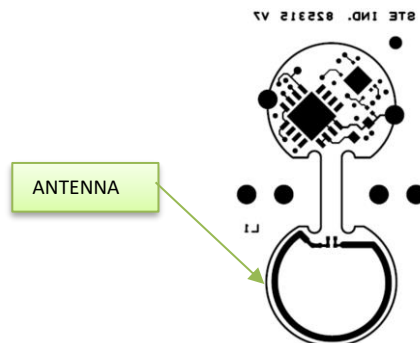
☐ YES ☒ NO

Does the EUT have detachable antenna(s)?

☐ YES ☒ NO

If detachable, is the antenna connector(s) non-standard?

☐ YES ☐ NO ☒ N/A



8.3 FCC 15.231(e) Timing requirements

8.3.1 Definitions and limits

- (e) In addition, devices operated under the provisions of this paragraph shall be provided with a means for automatically limiting operation so that the duration of each transmission shall not be greater than one second and the silent period between transmissions shall be at least 30 times the duration of the transmission but in no case less than 10 seconds.

8.3.2 Test summary

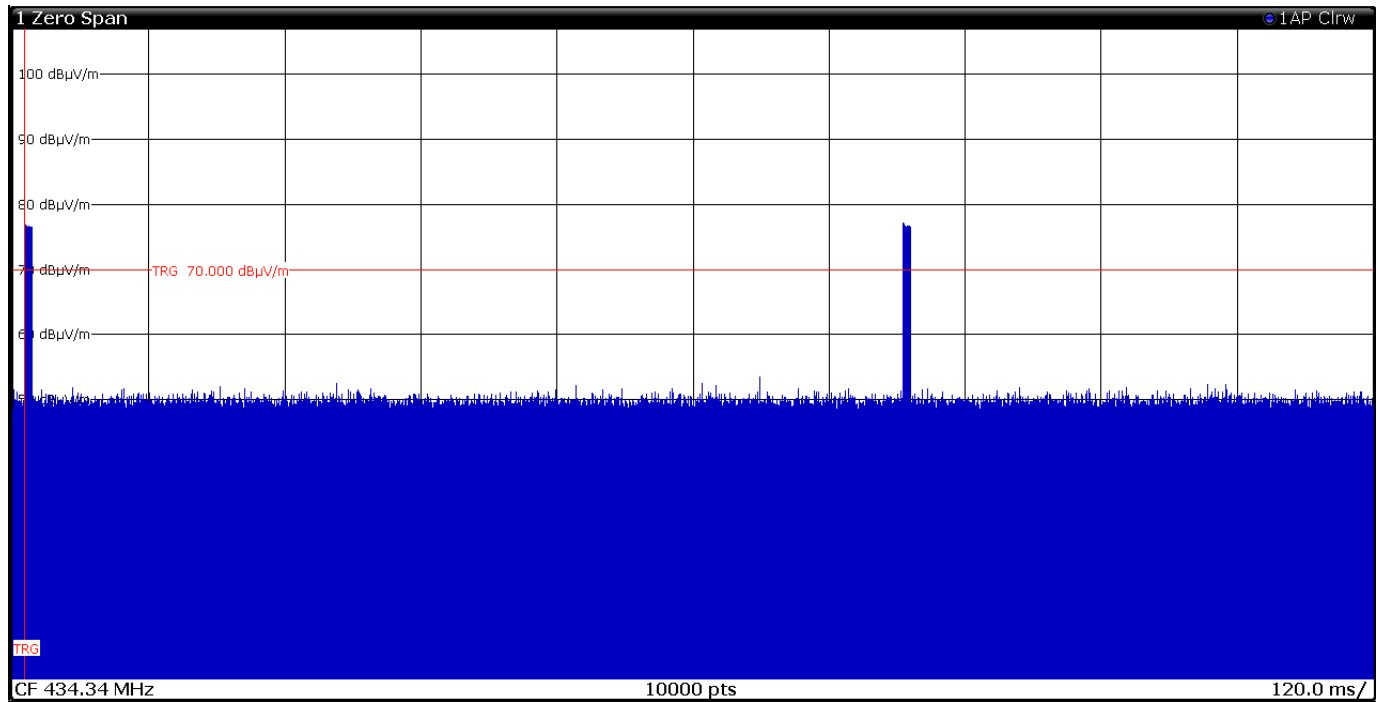
Test date	June 26, 2019	Temperature	25 °C
Test engineer	G. Tepelena	Air pressure	1025 mbar
Verdict	Pass	Relative humidity	36 %

8.3.3 Observations, settings and special notes

None

8.3.4 Test data

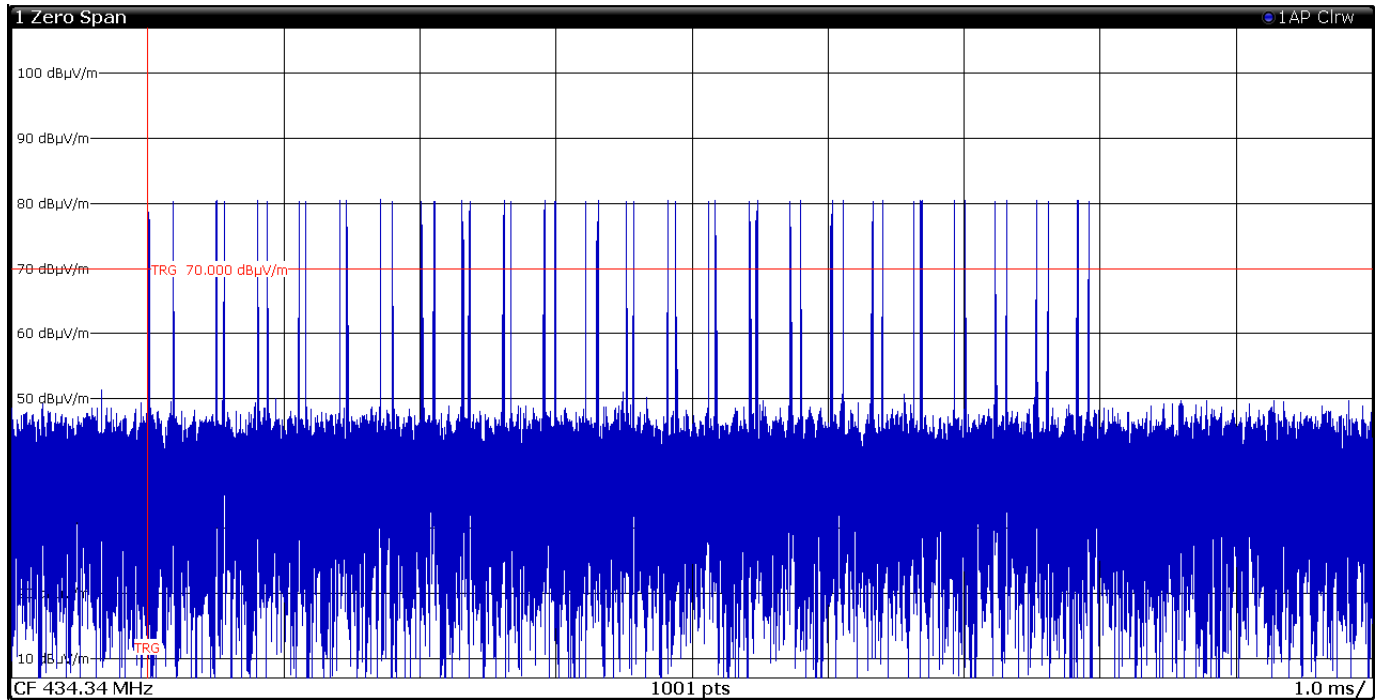
Once triggered the EUT start to transmit repetition rate 2min. Every 2 min transmit 2 time the pulse train sequence of 7 ms. The distance between 2 pulses trains are 800 ms.



Repetition rate = 2 min
 Pulse train sequence = 7 ms
 N° of pulses trains = 2

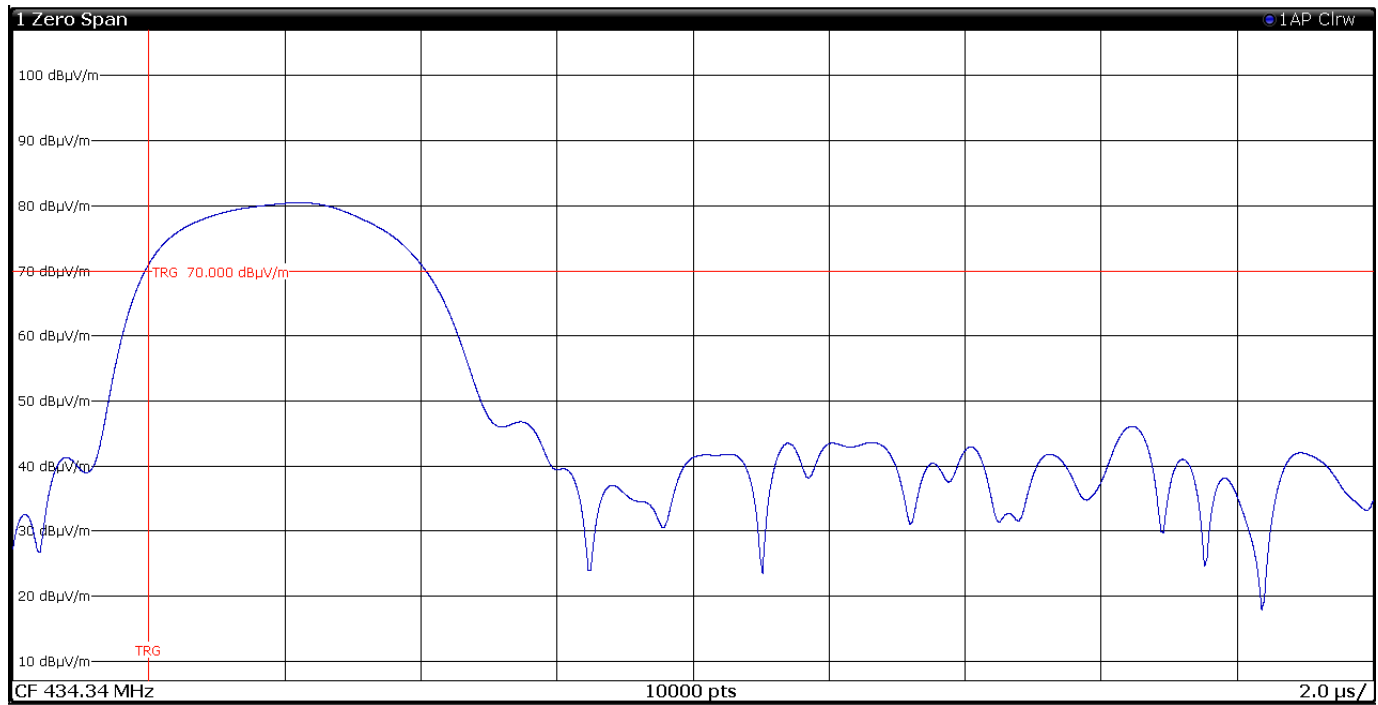
Transmission duration: $800 + 2 \times 7 = 814$ ms, 0.814 s
 Silent time between transmissions: $120 \text{ s} > 30 \times 0.814 = 24.42 \text{ s}$

The single pulse train sequence of 7 ms include 46 pulse with a single duration of 4 μ s.



Detailed timing information:

The EUT repeat the following pattern:



46 pulses with TX on for $4\mu s = 184\mu s = 0,184\text{ ms} = T_{X100ms}$;

$$\text{Duty cycle or average factor} = 20 \times \log_{10} \left(\frac{T_{X100ms}}{100ms} \right)$$

The duty cycle factor calculated, with the above equation, is: 0,184%. (-54,7dB)*

* if duty cycle percentage is below -20 dB, the max duty cycle to be considered is -20dB.

8.4 FCC 15.231(e) Field strength of emissions

8.4.1 Definitions and limits

- (e) Intentional radiators may operate at a periodic rate exceeding that specified in paragraph (a) of this section and may be employed for any type of operation, including operation prohibited in paragraph (a) of this section, provided the intentional radiator complies with the provisions of paragraphs (b) through (d) of this section, except the field strength table in paragraph (b) of this section is replaced by the following:

Table 8.4-1: Field strength limits

Fundamental frequency (MHz)	Field strength of fundamental		Field strength of spurious emissions	
	($\mu\text{V/m}$)	(dB $\mu\text{V/m}$)	($\mu\text{V/m}$)	(dB $\mu\text{V/m}$)
40.66–40.70	1,000	60	100	40
70–130	500	53.9	50	33.9
130–174	500 to 1,500*	53.9 to 63.5*	50 to 150*	33.9 to 43.5*
174–260	1,500	63.5	150	43.5
260–470	1,500 to 5,000*	63.5 to 74.0*	150 to 500*	43.5 to 53.9*
Above 470	5,000	74.0	500	53.9

* Linear interpolations

Note:

* Linear interpolation with frequency F in MHz

Table 8.4-2: FCC §15.209– Radiated emission limits

Frequency, MHz	Field strength of emissions		Measurement distance, m
	$\mu\text{V/m}$	dB $\mu\text{V/m}$	
0.009–0.490	2400/F	$67.6 - 20 \times \log_{10}(F)$	300
0.490–1.705	24000/F	$87.6 - 20 \times \log_{10}(F)$	30
1.705–30.0	30	29.5	30
30–88	100	40.0	3
88–216	150	43.5	3
216–960	200	46.0	3
above 960	500	54.0	3

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

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

Table 8.4-3: FCC restricted frequency bands

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

8.4.2 Test summary

Test date	June 26, 2019	Temperature	25 °C
Test engineer	G. Tepelena	Air pressure	1025 mbar
Verdict	Pass	Relative humidity	36 %

8.4.3 Observations, settings and special notes

The spectrum was searched from 30 MHz to the 5 GHz.

Radiated measurements were performed at a distance of 3 m.

EUTs that can be operated in multiple orientations (such as handheld, portable, or modular devices) shall be tested in three orientations.

Average radiated emissions were obtained by subtracting duty cycle / correction factor from the peak measurement results.

Spectrum analyser settings for radiated measurements below 1 GHz:

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

Spectrum analyser settings for radiated measurements above 1 GHz:

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

8.4.4 Test data

Duty cycle/average factor calculations

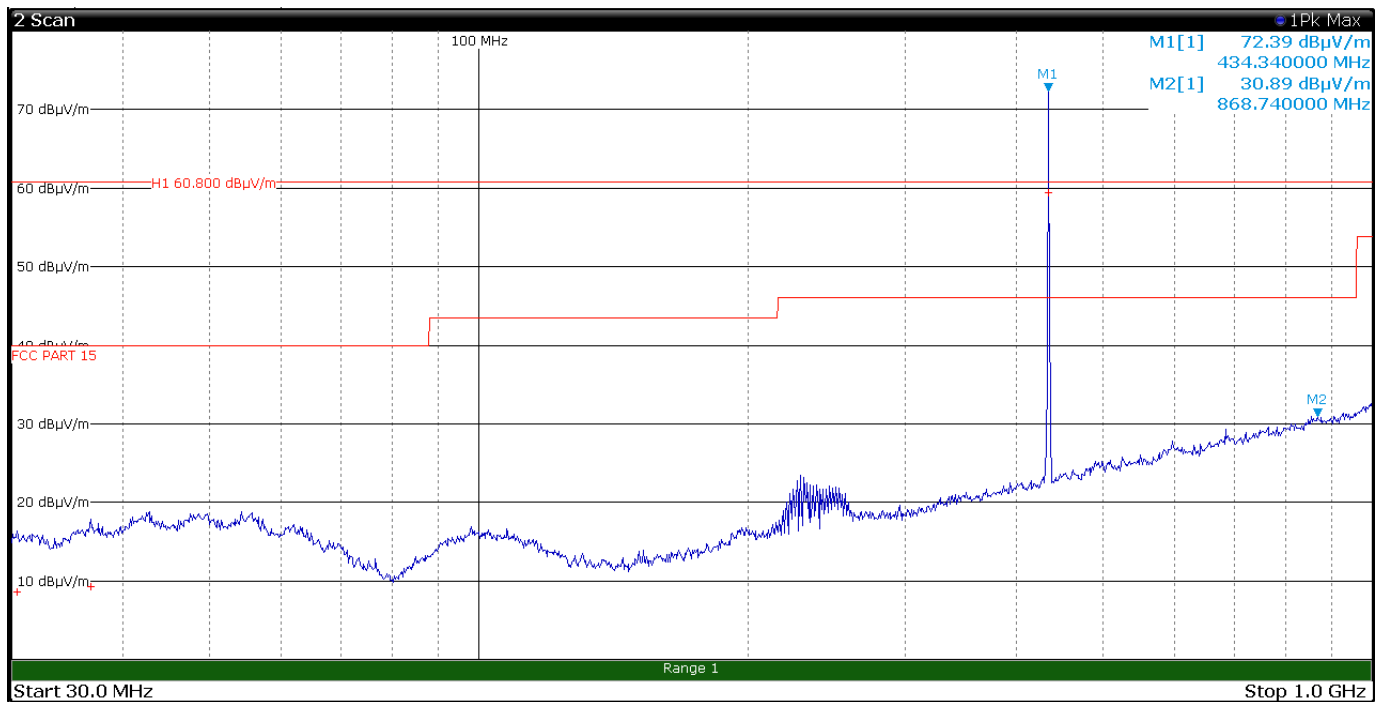
§15.35(c) When the radiated emission limits are expressed in terms of the average value of the emission, and pulsed operation is employed; the measurement field strength shall be determined by averaging over one complete pulse train, including blanking intervals, as long as the pulse train does not exceed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

$$\text{Duty cycle or average factor} = 20 \times \log_{10} \left(\frac{T_{x100ms}}{100ms} \right)$$

46 pulses with TX on for 4µs = 184µs = 0,184 ms = TX_{100ms} ;

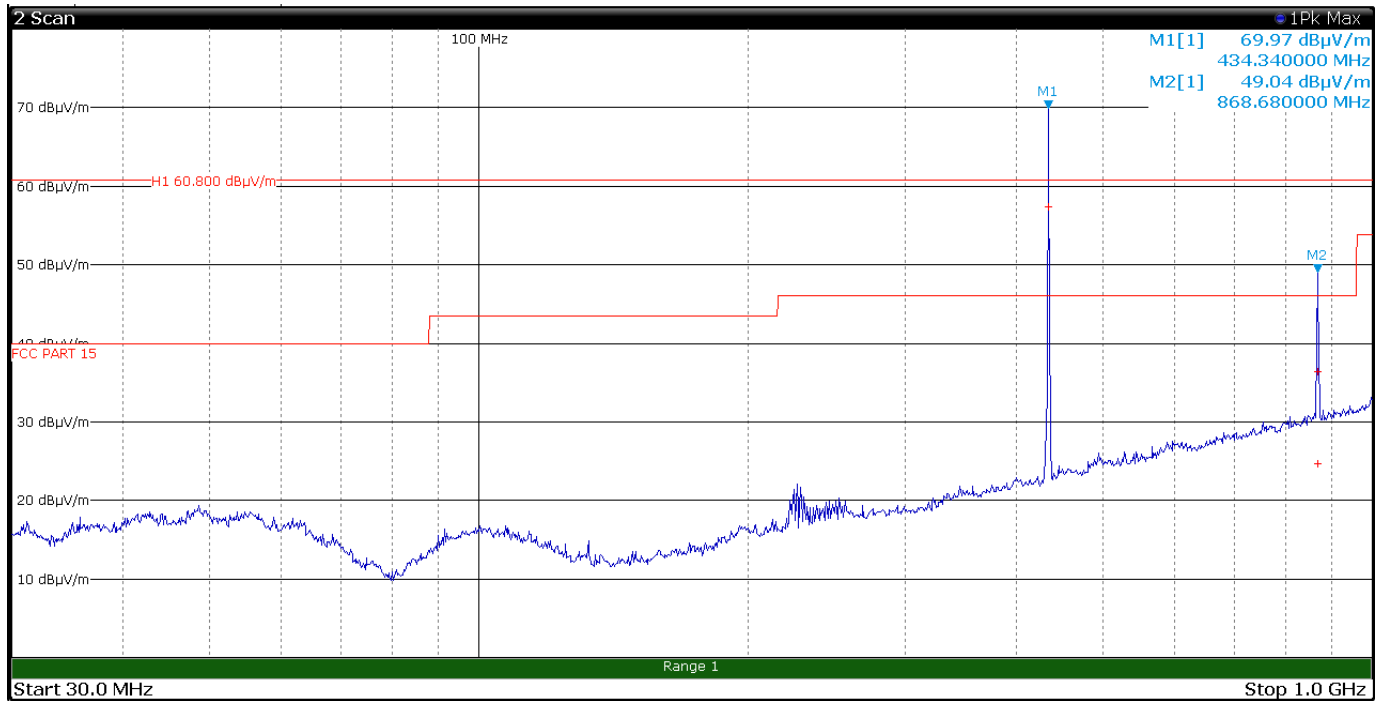
The duty cycle factor calculated, with the above equation, is: 0,184%. (-54,7dB)*

* if duty cycle percentage is below -20 dB, the max duty cycle to be considered is -20dB.



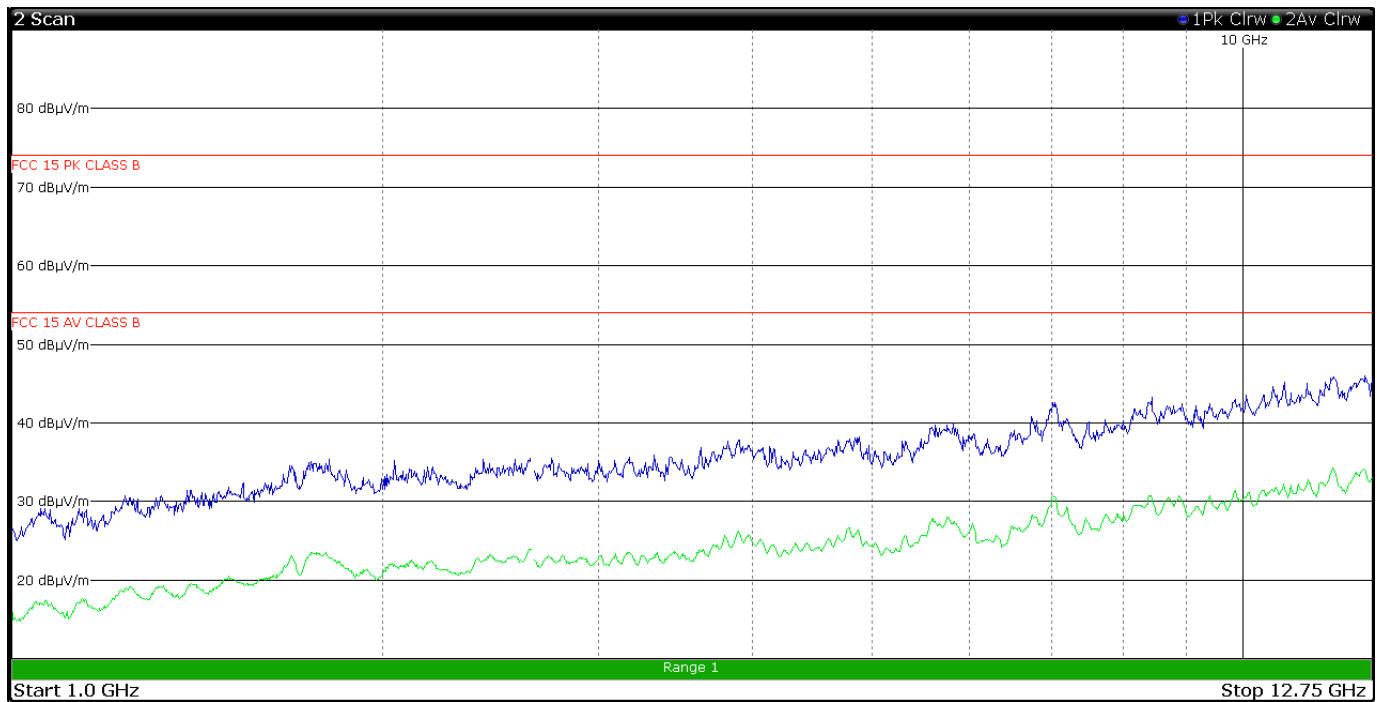
Radiated emission in the frequency range 30 to 1000 MHz with EUT in horizontal position and the antenna horizontal polarization

Frequency, MHz	Peak field strength, dBµV/m	Peak limit, dBµV/m	Margin, dB	Duty cycle factor, dB	Average field strength, dBµV/m	Average limit, dBµV/m	Margin, dB
434.34	72.39	--	--	-20	52.39	72.9	-20.51



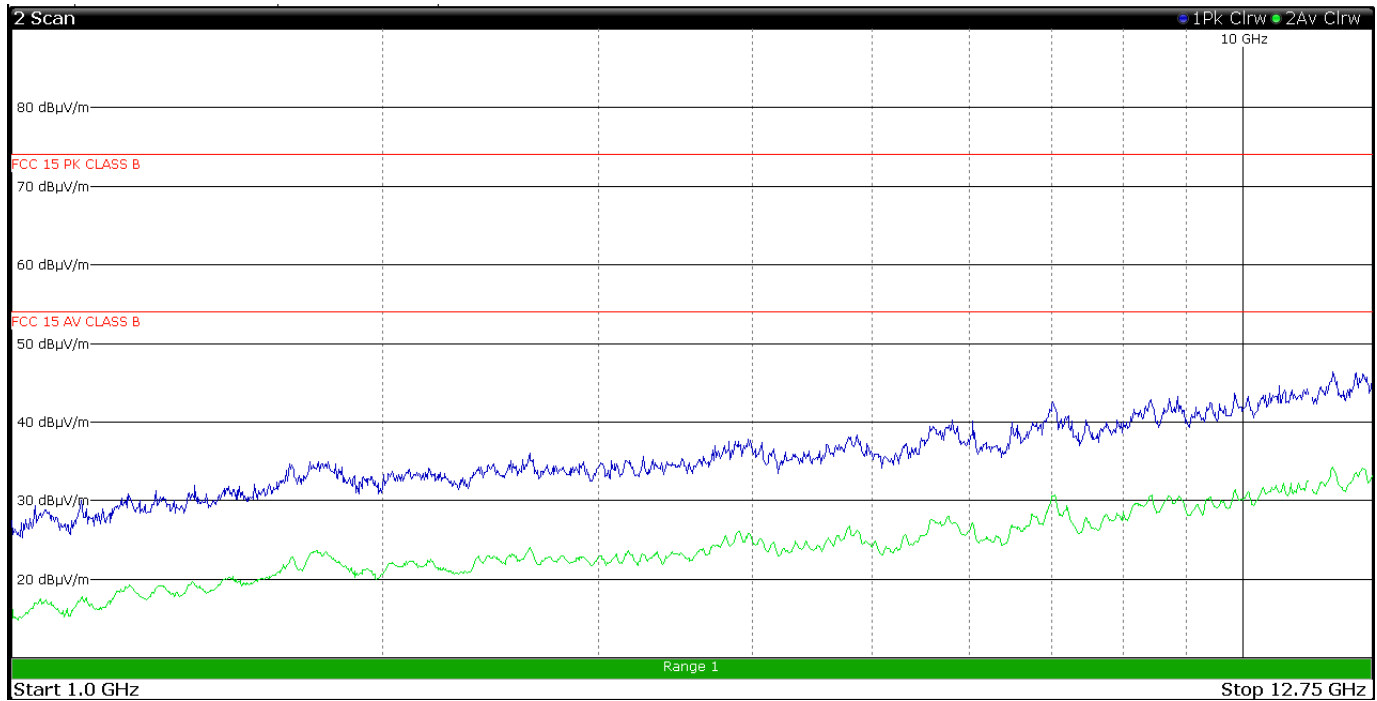
Radiated emission in the frequency range 30 to 1000 MHz with EUT in horizontal position and the antenna in vertical polarization

Frequency, MHz	Peak field strength, dBμV/m	Peak limit, dBμV/m	Margin, dB	Duty cycle factor, dB	Average field strength, dBμV/m	Average limit, dBμV/m	Margin, dB
434.34	69.97	--	--	-20	49.97	72.9	-22.93
868.68	49.04	--	--	-20	29.04	52.9	-23.86



Radiated emission in the frequency range 1 to 12.75 GHz with EUT in horizontal position and the antenna in horizontal polarization

Frequency, MHz	Peak field strength, dBμV/m	Peak limit, dBμV/m	Margin, dB	Duty cycle factor, dB	Average field strength, dBμV/m	Average limit, dBμV/m	Margin, dB
--	--	74.0	--	-20	--	54.0	--



Radiated emission in the frequency range 1 to 12.75 GHz with EUT in horizontal position and the antenna in vertical polarization

Frequency, MHz	Peak field strength, dBμV/m	Peak limit, dBμV/m	Margin, dB	Duty cycle factor, dB	Average field strength, dBμV/m	Average limit, dBμV/m	Margin, dB
--	--	74.0	--	-20	--	54.0	--

8.5 FCC 15.231(c) Emission bandwidth of momentary signals

8.5.1 Definitions and limits

The bandwidth of the emission shall be no wider than 0.25 % of the center frequency for devices operating above 70 MHz and below 900 MHz. For devices operating above 900 MHz, the emission shall be no wider than 0.5 % of the center frequency. Bandwidth is determined at the points 20 dB down from the modulated carrier.

8.5.2 Test summary

Test date	June 25, 2019	Temperature	25 °C
Test engineer	G. Tepelena	Air pressure	1025 mbar
Verdict	Pass	Relative humidity	36 %

8.5.3 Observations, settings and special notes

Limit: 0.25 % of 434.34 MHz is 1.086 MHz

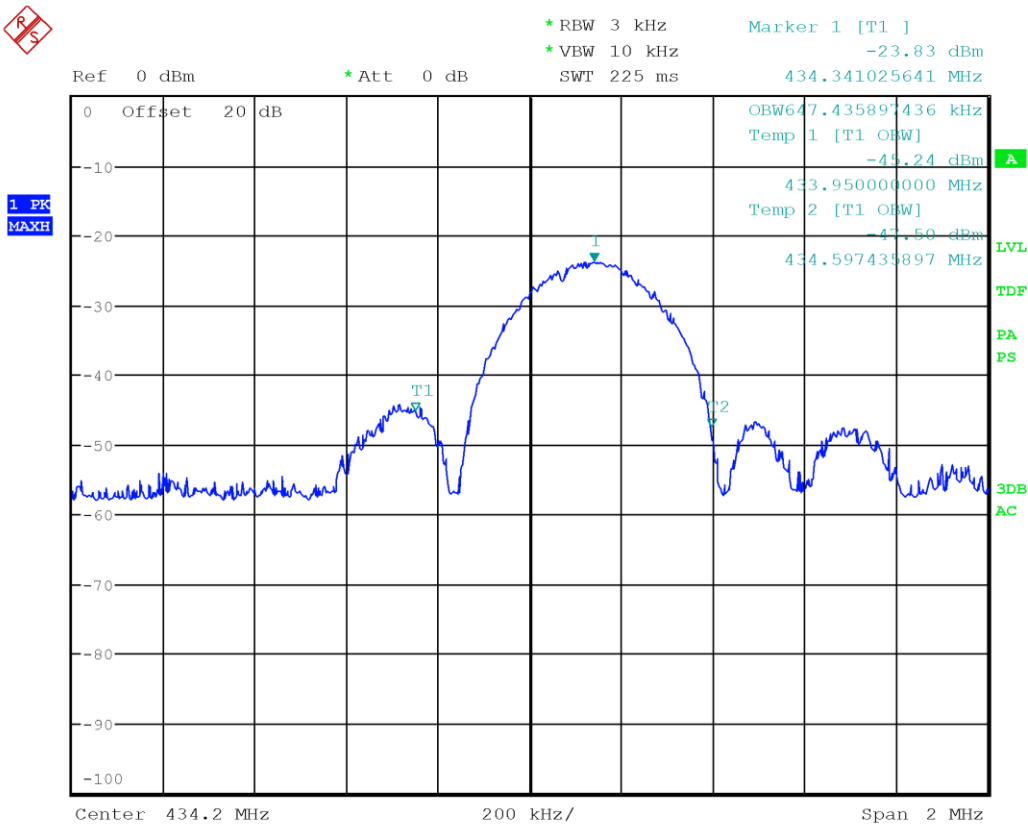
Spectrum analyzer settings:

Resolution bandwidth	≥ 1 % of emission bandwidth
Video bandwidth	≥ 3 × RBW
Frequency span	Wider than emission bandwidth
Detector mode	Peak

8.5.4 Test data

Table 8.5-1: Occupied bandwidth measurement result

Occupied bandwidth per frequency, KHz	Limit, MHz	Margin, MHz
647.43	1.086	-0.438

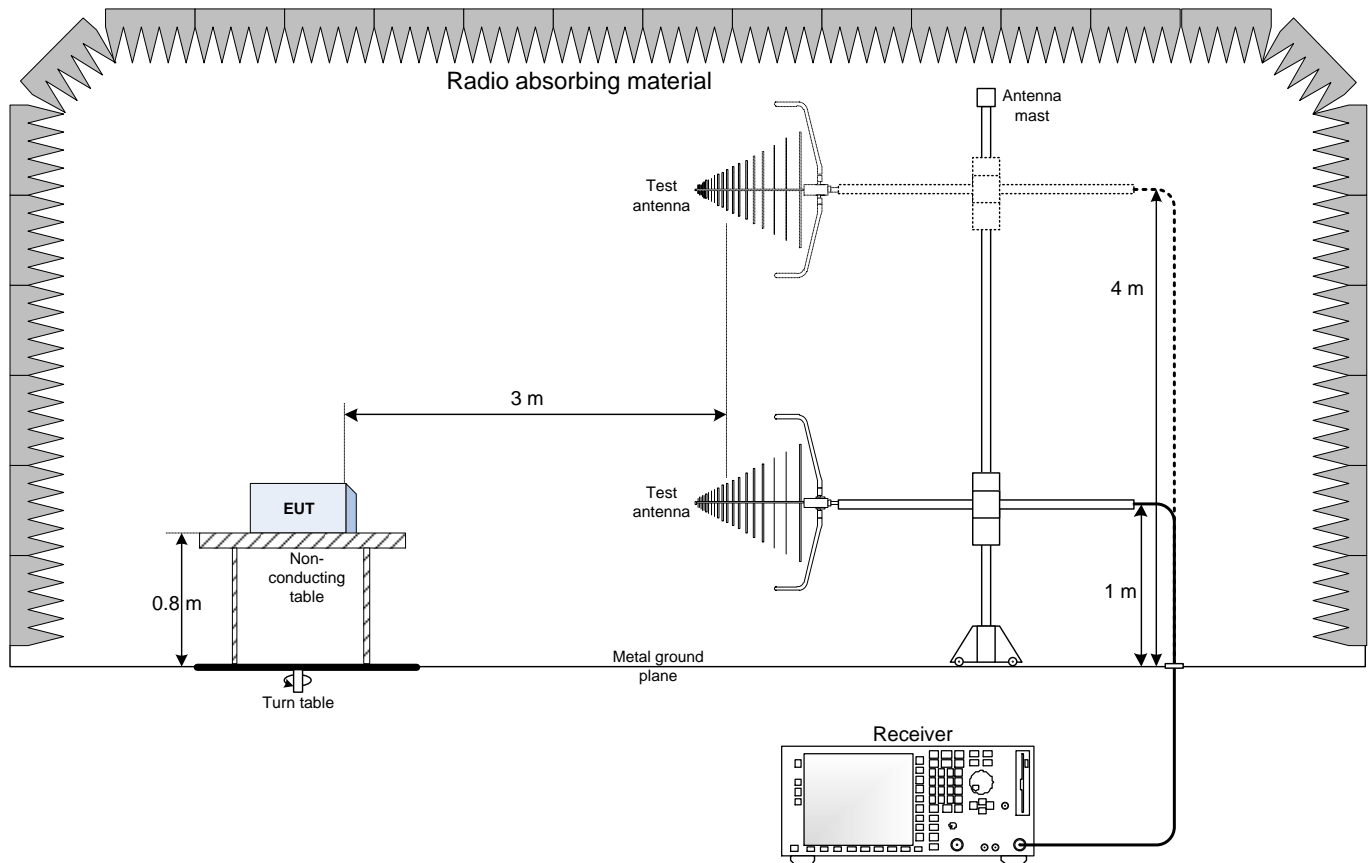


Date: 25.JUN.2019 21:01:50

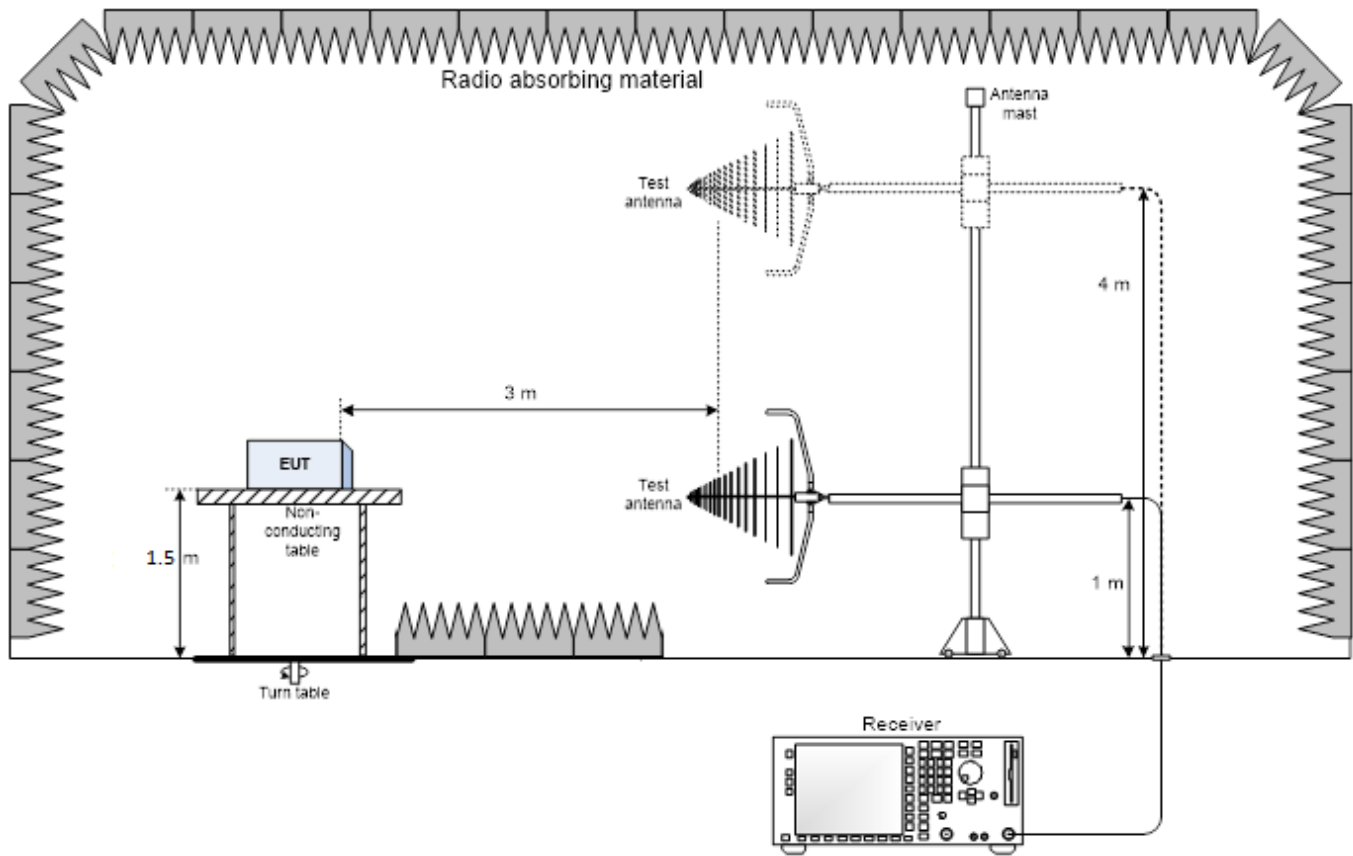
Figure 8.5-1: Occupied bandwidth measurement (20 dB)

Section 9. Block diagrams of test set-ups

9.1 Radiated emissions set-up for frequencies below 1 GHz

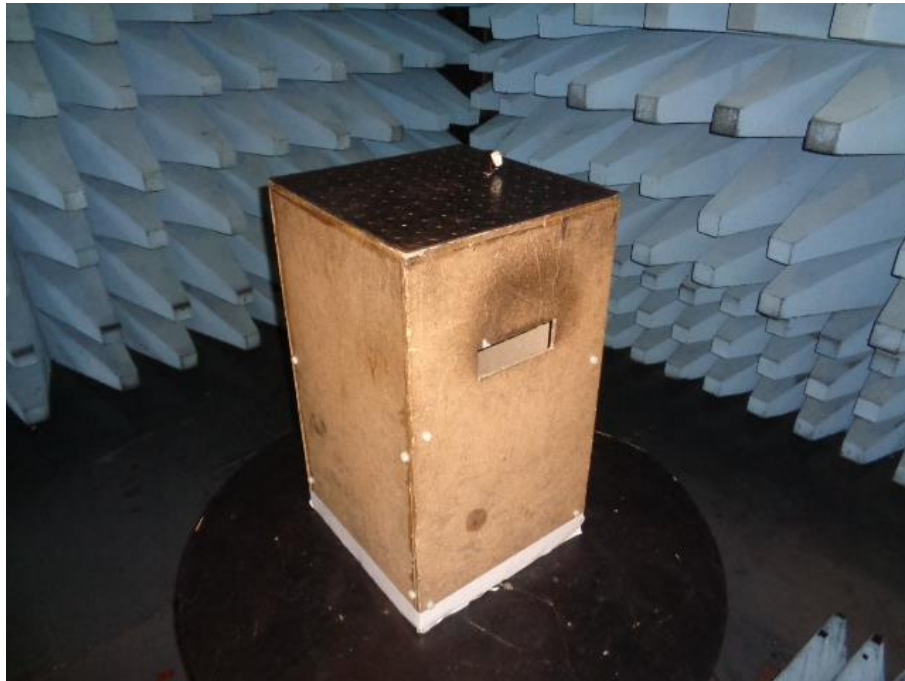


9.2 Radiated emissions set-up for frequencies above 1 GHz



Section 10. Photos

10.1 Photos of the test set-up



10.2 Photos of the EUT



End of report