

# FCC PART 15, SUBPART C ISEDC RSS-247, ISSUE 3, AUGUST 2023

# TEST AND MEASUREMENT REPORT

For

# **Dusty Robotics, Inc.**

909 San Rafael Ave, Mountain View, CA 94043, USA

FCC ID: 2BE9F-FLDTRACK100 IC: 32036-FLDTRACK100

Report Type: Product Type:

Original Report Tracker Radio

Libass Thiaw

Prepared By: Test Engineer

**Report Number:** R2401313-DTS

**Report Date:** 2024-06-10

Christian McCaig

**Reviewed By:** RF Lead Engineer

Bay Area Compliance Laboratories Corp.

1274 Anvilwood Avenue,

Sunnyvale, CA 94089, USA

Tel: +1 (408) 732-9162, Fax: +1 (408) 732-9164





**Note**: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA\*, NIST, or any agency of the Federal Government.

<sup>\*</sup> This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "\*" (Rev.2)

# **TABLE OF CONTENTS**

I Ger	neral Description	
1.1	Product Description for Equipment Under Test (EUT)	5
1.2	Mechanical Description of EUT	5
1.3	Objective	
1.4	Related Submittal(s)/Grant(s)	5
1.5	Test Methodology	
1.6	Measurement Uncertainty	
1.7	Test Facility Registrations	6
1.8	Test Facility Accreditations	7
2 Sys	tem Test Configuration	9
2.1	Justification	
2.2	EUT Exercise Software	
2.3	Duty Cycle Correction Factor	
2.4	Equipment Modifications	
2.5	Remote Support Equipment	
2.6	Local Support Equipment	
2.7	Interface Ports and Cabling.	
	nmary of Test Results	
4 FC	C §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements	
4.1	Applicable Standards	
4.2	Antenna Description	
	C §2.1091, §15.247(i) & ISEDC RSS-102 - RF Exposure	
5.1	Applicable Standards	
5.2	MPE Prediction	
5.3	RF exposure evaluation for FCC	
5.4	RF exposure exemption for IC	
	C §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions	16
6.1	Applicable Standards	
6.2	Test Setup	
6.3	Test Procedure	
6.4	Corrected Amplitude & Margin Calculation	
6.5	Test Equipment List and Details	
6.6	Test Environmental Conditions	
6.7	Summary of Test Results	
6.8	Radiated Emissions Test Results	
	C §15.247(a) (2) & ISEDC RSS-247 §5.2, RSS-Gen §6.7 - Emission Bandwidth	
7.1	Applicable Standards	
7.2 7.3	Measurement Procedure	
	Test Equipment List and Details	
7.4 7.5	Test Results	
	C §15.247(b) (3) & ISEDC RSS-247 §5.4 - Output Power	
8.1	Applicable Standards	
8.2	Measurement Procedure	
8.3	Test Equipment List and Details	
8.4	Test Environmental Conditions	
8.5	Test Results	
	C §15.247(e) & ISEDC RSS-247 §5.2(2) - Power Spectral Density	
9.1	Applicable Standards	
9.2	Measurement Procedure	
9.3	Test Equipment List and Details	
9.4	Test Environmental Conditions	
9.5	Test Results	
	C §15.247(d) & ISEDC RSS-247 §5.5 - 100 kHz Bandwidth of Band Edges	

10.1	Applicable Standards	39
10.2	Measurement Procedure	
10.3	Test Equipment List and Details	40
10.4	Test Environmental Conditions	40
10.5	Test Results	41
11 FC	C §15.247(d) & ISEDC RSS-247 §5.5 - Spurious Emissions at Antenna Terminals	42
11.1	Applicable Standards	
11.2	Test Procedure	42
11.3	Test Equipment List and Details	
11.4	Test Environmental Conditions	42
11.5	Test Results	
12 An	nex B (Normative) - Test Setup Photographs	46
13 An	nex C (Normative) - EUT External Photographs	47
	nex D (Normative) - EUT Internal Photographs	
15 An	nex E (Normative) - A2LA Electrical Testing Certificate	49

# **DOCUMENT REVISION HISTORY**

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2401313-DTS	Original Report	2024-06-10

## 1 General Description

#### 1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Dusty Robotics, Inc.* and their product model: *Tracker Radio*, FCC ID: 2BE9F-FLDTRACK100, IC: 32036-FLDTRACK100 or the "EUT" as referred to in this report. It is a device that operates in 902-928 MHz Radio.

#### 1.2 Mechanical Description of EUT

The EUT measures approximately 17.9 cm (Length), 10.0 cm (Width), and 4.7 cm (Height) and weighs 0.35kg.

The data gathered was from a production sample provided by Dusty Robotics with S/N: T11-ME-A-D0007-02

#### 1.3 Objective

This report was prepared on behalf of *Dusty Robotics, Inc..*, in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission's rules and ISEDC RSS-247 Issue 3, August, 2023.

The objective was to determine compliance with FCC Part 15.247 and ISEDC RSS-247 for Antenna Requirements, RF Exposure, AC Line Conducted Emissions, Conducted & Radiated Spurious Emissions, Emission Bandwidth, Output Power, Power Spectral Density, and 100 kHz Bandwidth of Band edges.

#### **1.4** Related Submittal(s)/Grant(s)

FCC Part 15C Equipment Class DTS, ISEDC RSS-247 with FCC ID: 2BE9F-FLDPRNTR100 and IC: 32036-FLDPRNTR100.

#### 1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

#### 1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5%
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48 dB
Unwanted Emissions, conducted	±1.57 dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2°C
Humidity	±5%
DC and low frequency voltages	±1.0%
Time	±2%
Duty Cycle	±3%

#### 1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

#### 1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

**A-** An independent, 3<sup>rd</sup>-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (\*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

# B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):
  - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
  - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
  - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
  - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
  - 2 All Scope 2-Licensed Personal Mobile Radio Services;
  - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
  - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
  - 5 All Scope 5-Licensed Fixed Microwave Radio Services
  - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
  - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
  - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
  - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
  - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
  - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
  - MIC Telecommunication Business Law (Terminal Equipment):
    - All Scope A1 Terminal Equipment for the Purpose of Calls;
    - All Scope A2 Other Terminal Equipment
  - 2 Radio Law (Radio Equipment):
    - All Scope B1 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
    - All Scope B2 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
    - All Scope B3 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

# C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
  - for Telephony (ver. 3.0)
  - for Audio/Video (ver. 3.0)
  - for Battery Charging Systems (ver. 1.1)
  - for Set-top Boxes & Cable Boxes (ver. 4.1)
  - for Televisions (ver. 6.1)
  - for Computers (ver. 6.0)
  - for Displays (ver. 6.0)
  - for Imaging Equipment (ver. 2.0)
  - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
  - for Commercial Dishwashers (ver. 2.0)
  - for Commercial Ice Machines (ver. 2.0)
  - for Commercial Ovens (ver. 2.1)
  - for Commercial Refrigerators and Freezers
- 3 Lighting Products
  - For Decorative Light Strings (ver. 1.5)
  - For Luminaires (including sub-components) and Lamps (ver. 1.2)
  - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
  - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
  - for Residential Ceiling Fans (ver. 3.0)
  - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
- For Water Coolers (ver. 3.0)

# **D-** A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada ISEDC) Foreign Certification Body –
   FCB APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China Taiwan):
  - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
  - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
  - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
  - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority OFTA)
   APEC Tel MRA -Phase I & Phase II
- Israel US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
  - o ENERGY STAR Recognized Test Laboratory US EPA
  - o Telecommunications Certification Body (TCB) US FCC;
  - Nationally Recognized Test Laboratory (NRTL) US OSHA
- Vietnam: APEC Tel MRA -Phase I;

# 2 System Test Configuration

#### 2.1 Justification

The EUT was configured for testing in accordance to ANSI C63.10.

#### 2.2 EUT Exercise Software

The EUT has built-in test firmware.

Channel Frequency (MHz)	Power Setting
903	16
915	16
925.5	16

#### 2.3 Duty Cycle Correction Factor

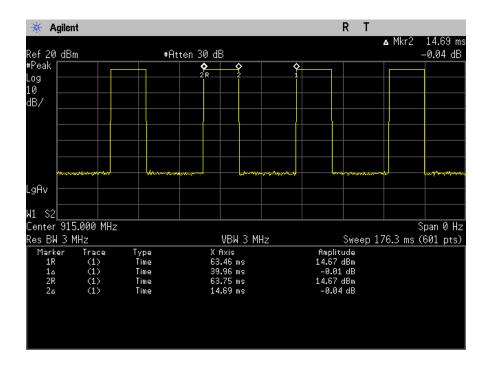
According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

Radio frequency (MHz)	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
915	14.6	39.96	36.54%	4.37

Duty Cycle = On Time (ms)/ Period (ms)
Duty Cycle Correction Factor (dB) = 10\*log(1/Duty Cycle)

Please refer to the following plot.



# 2.4 Equipment Modifications

None

# 2.5 Remote Support Equipment

None

# 2.6 Local Support Equipment

Manufacturer	Model	Serial Number
Dell	Laptop	-

# 2.7 Interface Ports and Cabling

Cable Descriptions	Length (m)	From	То
USB to TTL Serial	< 1 m	EUT	Laptop
RF	< 1 m	EUT	PSA

# 3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1091, §15.247(i) ISEDC RSS-102	RF Exposure	Compliant
FCC §15.207 ISEDC RSS-Gen §8.8	AC Line Conducted Emissions	N/A*
FCC §15.209, §15.247(d) ISEDC RSS-247 §5.5 RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISEDC RSS-247 §5.2 RSS-Gen §6.7	6 dB & 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISEDC RSS-247 §5.4	Average Output Power	Compliant
FCC §15.247(e) ISEDC RSS-247 §5.2(2)	Power Spectral Density	Compliant
FCC §15.247(d) ISEDC RSS-247 §5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §2.1051, §15.247 (d) ISEDC RSS-247 §5.5	Spurious Emissions at Antenna Port	Compliant

*N/A\*: The EUT is battery powered.* 

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

## 4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements

#### 4.1 Applicable Standards

According to FCC §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. 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.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

#### 4.2 Antenna Description

Report Number: R2401313-DTS

External/Internal/	Frequency Range	Antenna Type	Maximum Antenna
Integral	(MHz)		Gain (dBi)
Internal	902-928 MHz	Puck, omni	2.2

Note: Antenna gain is information provided by customer.

# 5 FCC §2.1091, §15.247(i) & ISEDC RSS-102 - RF Exposure

#### 5.1 Applicable Standards

According to FCC §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB 447 498 Section (7.2), "simultaneous transmission of MPE test exclusion applies when the sum of the MPE ratios for all simultaneous transmitting antennas incorporated in a host device, based on calculated or measured field strengths or power density, is  $\leq 1.0$ . The MPE ratio of each antenna is determined at the minimum *test separation distance* required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to MPE limit, at the test frequency.

**Limits for General Population/Uncontrolled Exposure** 

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm²)	Averaging Time (minutes)
	Limits for Gen	eral Population/Unco	ntrolled Exposure	
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* (180/f <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

Where: f = frequency in MHz

Before equipment certification is granted, the procedure of IC RSS-102 must be followed concerning the exposure of humans to RF field.

<sup>\* =</sup> Plane-wave equivalent power density

#### **According to ISED RSS-102 Issue 5:**

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHzFootnote6 and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 4.49/f0.5 W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $1.31 \times 10^{-2} f0.6834$  W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

#### 5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

Page 14 of 49

R = distance to the center of radiation of the antenna

#### 5.3 RF exposure evaluation for FCC

#### Worst Case: 915 MHz

Maximum output power at antenna input terminal (dBm):	<u>14.94</u>
Maximum output power at antenna input terminal (mW):	<u>31.19</u>
Prediction distance (cm):	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>915</u>
Maximum Directional Antenna Gain, typical (dBi):	<u>2.2</u>
Maximum Antenna Gain (numeric):	<u>1.66</u>
Power density of prediction frequency at 20.0 cm (mW/cm <sup>2</sup> ):	<u>0.01</u>
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm <sup>2</sup> ):	<u>1.0</u>

The device is compliant with the requirement FCC MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.01 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

#### 5.4 RF exposure exemption for IC

Worst Case: 915 MHz

Maximum EIRP power = 14.94 dBm + 2.2 dBi = 17.44 dBm which is lesser than  $1.31 \times 10^{-2} f^{0.6834} = 2.6764 \text{ W} = 34.276 \text{ dBm}$ .

Therefore, the RF exposure Evaluation is exempt.

# 6 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

#### **6.1** Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
$\begin{array}{c} 0.090 - 0.110 \\ 0.495 - 0.505 \\ 2.1735 - 2.1905 \\ 4.125 - 4.128 \\ 4.17725 - 4.17775 \\ 4.20725 - 4.20775 \\ 6.215 - 6.218 \\ 6.26775 - 6.26825 \\ 6.31175 - 6.31225 \\ 8.291 - 8.294 \\ 8.362 - 8.366 \\ 8.37625 - 8.38675 \\ 8.41425 - 8.41475 \\ 12.29 - 12.293 \\ 12.51975 - 12.52025 \\ 12.57675 - 12.57725 \\ 13.36 - 13.41 \end{array}$	16.42 - 16.423 $16.69475 - 16.69525$ $25.5 - 25.67$ $37.5 - 38.25$ $73 - 74.6$ $74.8 - 75.2$ $108 - 121.94$ $123 - 138$ $149.9 - 150.05$ $156.52475 - 156.52525$ $156.7 - 156.9$ $162.0125 - 167.17$ $167.72 - 173.2$ $240 - 285$ $322 - 335.4$ $399.9 - 410$ $608 - 614$	960 - 1240 $1300 - 1427$ $1435 - 1626.5$ $1645.5 - 1646.5$ $1660 - 1710$ $1718.8 - 1722.2$ $2200 - 2300$ $2310 - 2390$ $2483.5 - 2500$ $2690 - 2900$ $3260 - 3267$ $3.332 - 3.339$ $3 3458 - 3 358$ $3.600 - 4.400$	4. 5 – 5. 15 5. 35 – 5. 46 7.25 – 7.75 8.025 – 8.5 9.0 – 9.2 9.3 – 9.5 10.6 – 12.7 13.25 – 13.4 14.47 – 14.5 15.35 – 16.2 17.7 – 21.4 22.01 – 23.12 23.6 – 24.0 31.2 – 31.8 36.43 – 36.5 Above 38.6

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

<sup>\*\*</sup> Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c).

As per ISEDC RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emission from licence-exempt transmitters shall company with the field strength limits shown in the table below. Additional, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

#### General Field Strength Limits for Licence-Excemption Transmitters at Frequencies above 30 MHz

Frequency (MHz)	Field Strength (µv/m at 3 meters)
30-88	100
88-216	150
216-960	200
Above 960*	500

<sup>\*</sup> Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for licence-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISEDC RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

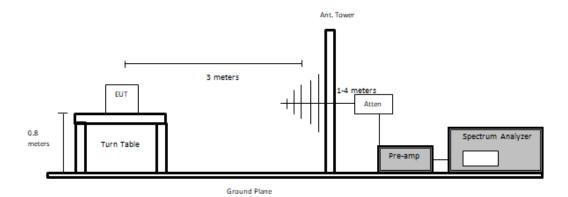
#### 6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISEDC RSS-247 limits.

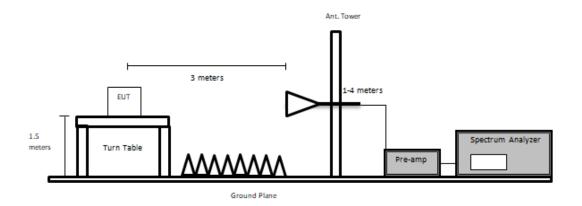
The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

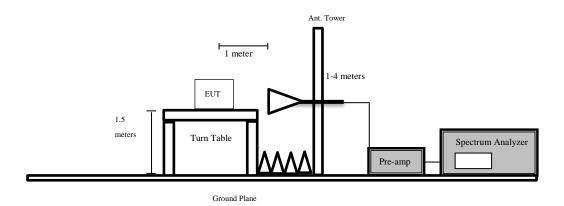
#### **Below 1 GHz:**



#### Above 1 GHz at 3m:



#### Above 1 GHz at 1m:



#### **6.3** Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

$$RBW = 100 \text{ kHz} / VBW = 300 \text{ kHz} / Sweep = Auto$$

Above 1000 MHz:

Report Number: R2401313-DTS

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1MHz / VBW = 1kHz / Sweep = Auto

#### 6.4 Corrected Amplitude & Margin Calculation

For emissions below 1 GHz and for above 1GHz scans.

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The "Margin" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

Margin = Corrected Amplitude – Limit

### 6.5 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
124	Rohde & Schwarz	EMI Test Receiver	ESCI	100044	2023-06-16	1 year
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2024-02-27	6 months
321	Sunol Sciences	Biconilog Antenna	ЈВ3	A020106-2; 1504	2023-12-18	2 years
1186	Pasternack	Coaxial Cable, RG214	PE3062- 1050CM	-	2023-10-03	6 months
1245	-	6dB Attenuator	PE7390-6	01182018A	2023-12-18	2 years
811	Hewlet Packard	RF Limiter	11867A	MY42243052	2024-02-13	6 months
1248	Pasternack	RG214 COAX Cable	PE3062	-	2023-10-04	6 months
1249	Time Microwave	LMR-400 Cable Dc-3 GHz	AE13684	2k80612-5 6fts	2023-10-09	6 months
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	12months
658	HP/ Agilant	Pre Amplifier 1-26.5 GHz	8449B OPT HO2	3008A01103	2023-12-01	6 months
1192	ETS Lindgren	Horn Antenna	3117	00218973	2022-09-29	2 years
1247	Uti flex	Micro - Coax	-	-	2023-12-01	6 months
1329	Pasternack	2.92mm short coaxial cable	PE360-12	-	2023-11-28	6 months
1346	RFMW	2.92mm 10ft RF cable	KMSE- 160SAW- 240.0-KSME	-	2023-11-03	1 year
672	Micro -Tronics	2.4-2.6 GHz Notch Filter	BRM50701	160	2024-03-06	1 year
327	Sunol Sciences	System Controller	SC110V	122303-1	NR	NR
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	NR	NR
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	NR	NR

Note<sup>1</sup>: cable and notch filter included in the test set-up will be checked each time before testing. Note<sup>2</sup>: this equipment was only used to perform testing below 1GHz on date of 2024-05-08

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

#### **6.6** Test Environmental Conditions

Temperature:	19°C
Relative Humidity:	34%
ATM Pressure:	102.2 kPa

The testing was performed by Will Hu and by Arturo Reyes from 2024-03-22 to 2024-03-22 in 5m chamber 3.

# **6.7** Summary of Test Results

According to the data hereinafter, the EUT <u>complied with FCC Part 15C and ISEDC RSS-247</u> standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting									
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Transmitting Channel						
-0.04	750.01725	Horizontal	903 MHz						

Please refer to the following table and plots for specific test result details.

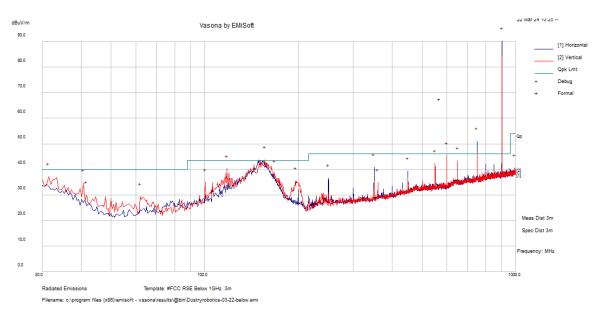
#### 6.8 Radiated Emissions Test Results

Note: Please refer to Annex A for conducted in lieu of radiated results

Note: below results were performed with antenna port terminated to show compliance of cabinet Emissions

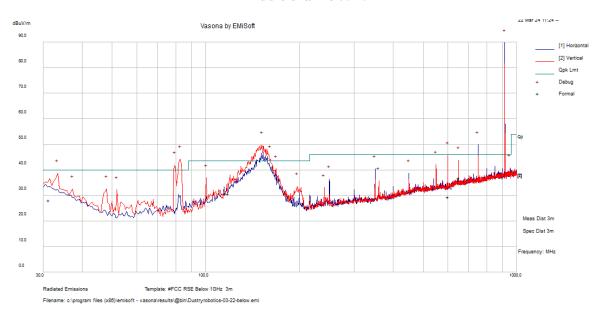
#### 1) 30 MHz to 1 GHz, Measured at 3 meters

#### Low channel: 903 MHz



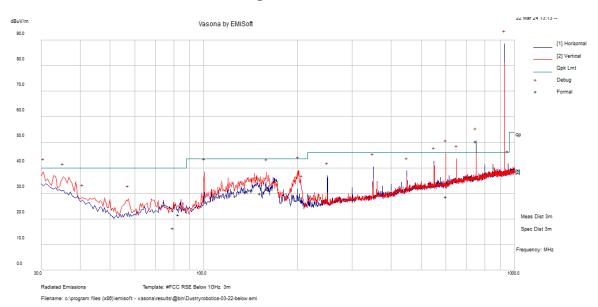
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
750.01725	43.68	2.28	45.96	106	Н	28	46	-0.04	QP
155.944	49.31	-8.27	41.04	114	V	52	43.5	-2.46	QP
600.11025	29.74	-0.48	29.26	106	V	174	46	-16.74	QP
650.06625	35.53	1.18	36.71	109	V	352	46	-9.29	QP
31.2955	30.07	-1.94	28.13	123	V	52	40	-11.87	QP
117.9725	37.77	-7.06	30.71	132	V	334	43.5	-12.79	QP

#### Middle channel: 915 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
151.52925	38.24	-8.17	30.07	115	V	150	43.5	-13.43	QP
83.02275	35.74	-14.05	21.69	115	V	14	40	-18.31	QP
750.01725	42.93	2.28	45.21	113	Н	38	46	-0.79	QP
79.59075	30.31	-13.93	16.38	160	V	287	40	-23.62	QP
161.437	39.85	-8.37	31.48	176	V	196	43.5	-12.02	QP
600.11175	29.26	-0.48	28.78	114	V	173	46	-17.22	QP

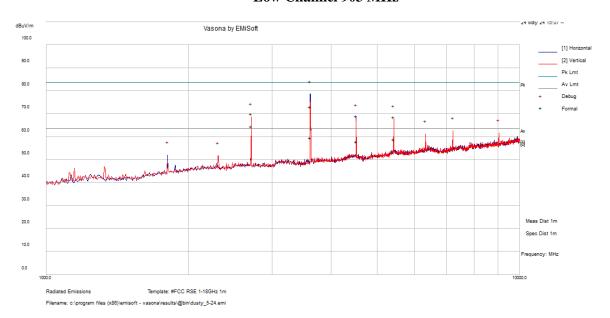
#### High channel: 925.5 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
750.01275	42.91	2.28	45.19	118	Н	41	46	-0.81	QP
600.11275	28.95	-0.48	28.47	117	V	189	46	-17.53	QP
30.52225	31.1	-1.34	29.76	184	V	136	40	-10.24	QP
650.0675	36.2	1.17	37.37	102	V	352	46	-8.63	QP
550.00925	43.72	-0.86	42.86	166	Н	233	46	-3.14	QP
35.3445	30.59	-4.57	26.02	152	V	277	40	-13.98	QP

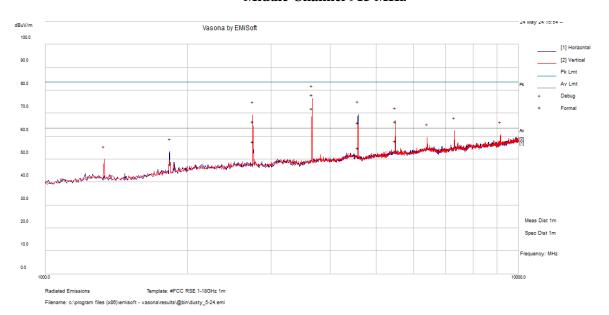
#### 1) 1GHz to 10GHz, Measured at 1 meters

#### Low Channel 903 MHz



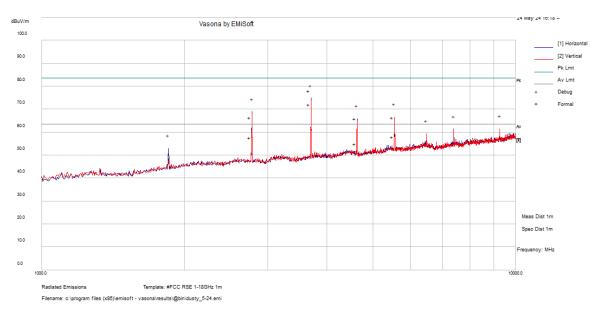
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
3610.7275	70.37	2.64	73.01	128	Н	123	83.54	-10.53	Peak
2709.3775	69.67	0.31	69.98	119	V	39	83.54	-13.56	Peak
4513.9675	64.31	4.74	69.05	117	Н	249	83.54	-14.49	Peak
5416.915	60.76	7.84	68.6	132	V	220	83.54	-14.94	Peak
3610.7275	56.85	2.64	59.49	128	Н	123	63.54	-4.05	Avg
2709.3775	58.45	0.31	58.76	119	V	39	63.54	-4.78	Avg
4513.9675	53.13	4.74	57.87	117	Н	249	63.54	-5.67	Avg
5416.915	51.01	7.84	58.85	132	V	220	63.54	-4.69	Avg

#### **Middle Channel 915 MHz**



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
3660.41	75.04	2.92	77.96	107	Н	107	83.54	-5.58	Peak
4576.265	60.93	4.93	65.86	103	Н	107	83.54	-17.68	Peak
2744.235	66.03	0.29	66.32	145	V	71	83.54	-17.22	Peak
5489.8675	59.02	7.45	66.47	117	V	224	83.54	-17.07	Peak
3660.41	59.42	2.92	62.34	107	Н	107	63.54	-1.2	Avg
4576.265	49.9	4.93	54.83	103	Н	107	63.54	-8.71	Avg
2744.235	57.26	0.29	57.55	145	V	71	63.54	-5.99	Avg
5489.8675	50.36	7.45	57.81	117	V	224	63.54	-5.73	Avg

#### **High Channel 925.5 MHz**



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margi n (dB)	Comment
3701.3675	70.18	3.04	73.22	101	Н	319	83.54	-10.32	Peak
2776.7175	67.59	0.39	67.98	112	Н	144	83.54	-15.56	Peak
5552.35	59.94	7.39	67.33	135	V	215	83.54	-16.21	Peak
4626.2775	62.18	4.9	67.08	136	Н	301	83.54	-16.46	Peak
3701.3675	59.75	3.04	62.79	101	Н	319	63.54	-0.75	Avg
2776.7175	62.16	0.39	62.55	112	Н	144	63.54	-0.99	Avg
5552.35	51.3	7.39	58.69	135	V	215	63.54	-4.85	Avg
4626.2775	49.84	4.9	54.74	136	Н	301	63.54	-8.8	Avg

# 7 FCC §15.247(a) (2) & ISEDC RSS-247 §5.2, RSS-Gen §6.7 - Emission Bandwidth

#### 7.1 Applicable Standards

According to FCC §15.247(a) (2) and ISEDC RSS-247 §5.2: the minimum 6 dB bandwidth shall be 500 kHz.

#### 7.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Measure Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

#### 7.3 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
-	-	SMA cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

#### 7.4 Test Environmental Conditions

Temperature:	21°C		
Relative Humidity:	39%		
ATM Pressure:	102.0 kPa		

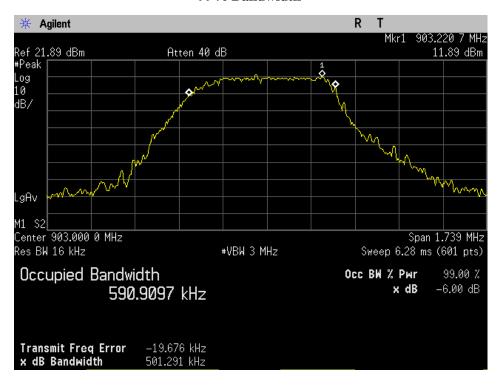
The testing was performed by Libass Thiaw on 2024-05-10 in RF Bench

#### 7.5 Test Results

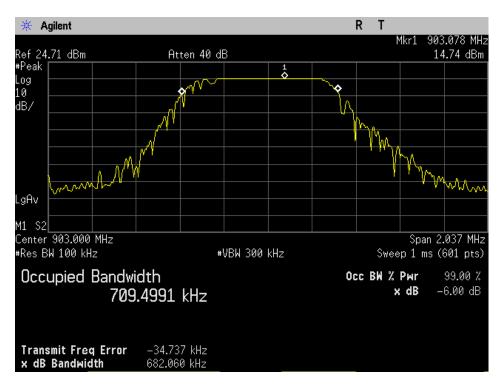
Channel	Frequency (MHz)	6 dB OBW (kHz)	99% OBW (kHz)	6 dB OBW Limit (kHz)	Result
Low	903	682.1	590.91	≥ 500	Pass
Middle	915	750.8	593.10	≥ 500	Pass
High	925.5	684.6	600.46	≥ 500	Pass

Please refer to the following plots for detailed test results.

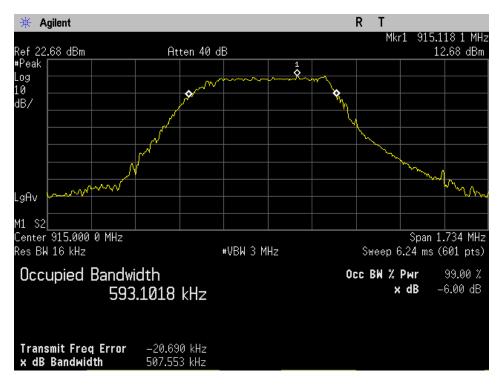
#### 903 MHz 99% Bandwidth



#### -6dB Bandwidth



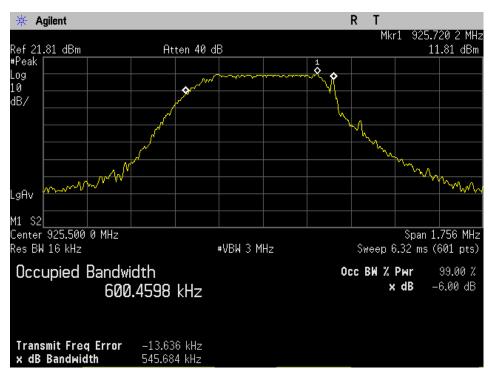
#### 915 MHz 99% Bandwidth



#### -6 dB Bandwidth



#### 925.5 MHz 99% Bandwidth



#### -6dB Bandwidth



# 8 FCC §15.247(b) (3) & ISEDC RSS-247 §5.4 - Output Power

#### 8.1 Applicable Standards

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

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

#### 8.2 Measurement Procedure

The measurements are based on ANSI C63.10-2013, Section 11.9.2.2.2.

#### 8.3 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
-	-	SMA cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

#### **8.4** Test Environmental Conditions

Report Number: R2401313-DTS

Temperature:	21°C		
Relative Humidity:	39%		
ATM Pressure:	102.0 kPa		

The testing was performed by Libass Thiaw on 2024-05-10 in RF Bench

#### 8.5 Test Results

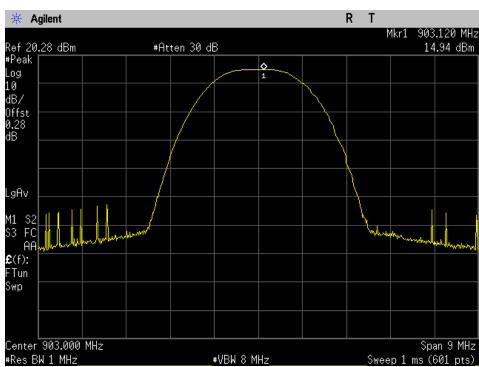
Channel	Frequency (MHz)	Antenna Gain (dBi)	Conducted Output Power (dBm)	Output Power Limit (dBm)	EIRP (dBm)	EIRP Limit (dBm)	Result
Low	903	2.2	14.94	30	17.14	36	Pass
Middle	915	2.2	14.77	30	16.97	36	Pass
High	925.5	2.2	14.86	30	17.06	36	Pass

Note: Output Power Limit reduced by amount in dB that antenna gain exceeds 6dBi.

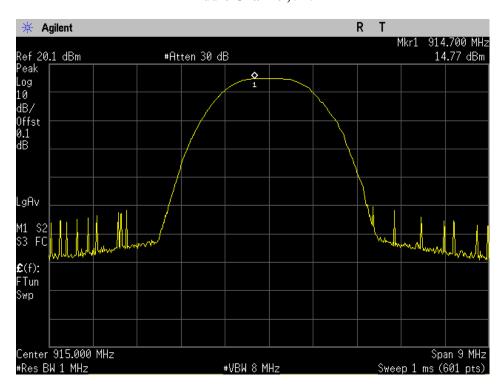
Note: EIRP (dBm) = Output Power (dBm) + Antenna Gain (dBi)

Please refer to the following plots for detailed test results.

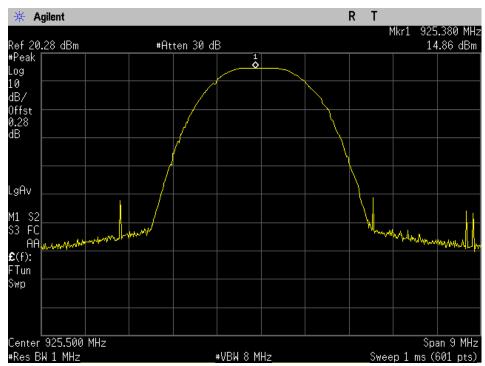
#### Low Channel, 903MHz



#### Middle Channel, 915MHz



High Channel, 925.5 MHz



# 9 FCC §15.247(e) & ISEDC RSS-247 §5.2(2) - Power Spectral Density

### 9.1 Applicable Standards

According to ECFR  $\S15.247(e)$  and RSS-247  $\S5.2(2)$ , for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

#### 9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8.4: Maximum power spectral density level in the fundamental emission.

### 9.3 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
-	-	SMA cable	-	-	Each Time <sup>1</sup>	N/A

Note<sup>1</sup>: equipment included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

#### 9.4 Test Environmental Conditions

Report Number: R2401313-DTS

Temperature:	21°C		
Relative Humidity:	39%		
ATM Pressure:	102.0 kPa		

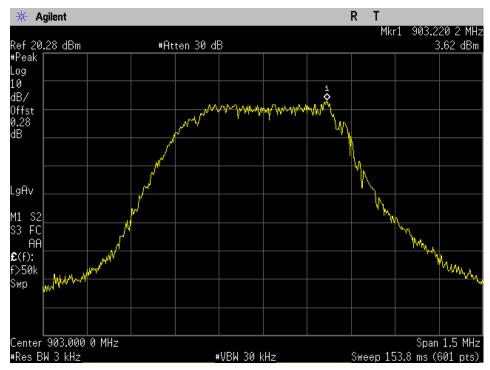
The testing was performed by Libass Thiaw on 2024-05-10 in RF Bench

## 9.5 Test Results

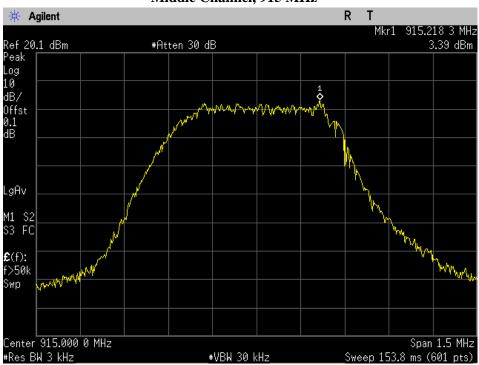
Channel	Frequency (MHz)	PSD [dBm/3kHz]	Limit (dBm/3kHz)	Result
Low	903	3.62	<8	Pass
Middle	915	3.39	< 8	Pass
High	925.5	3.05	<8	Pass

Note: PSD Limit reduced by amount in dB that antenna gain exceeds 6dBi.

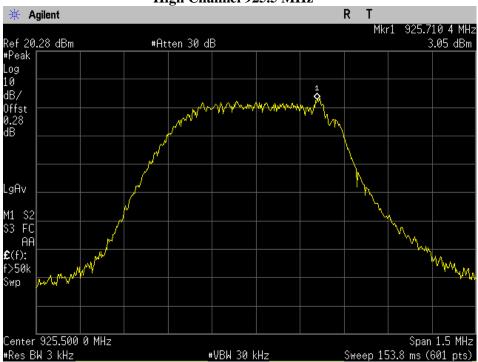
## Low Channel 903 MHZ



## Middle Channel, 915 MHz



## **High Channel 925.5 MHz**



## 10 FCC §15.247(d) & ISEDC RSS-247 §5.5 - 100 kHz Bandwidth of Band Edges

## 10.1 Applicable Standards

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

According to ISEDC RSS-247 §5.5.In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

#### **10.2** Measurement Procedure

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation

RBW = 100 kHz VBW = 300 kHz Sweep = coupled Detector function = peak Trace = max hold

Report Number: R2401313-DTS

## 10.3 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
-	-	SMA cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable included in the test set-up will be checked each time before testing.

**Statement of Traceability: BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

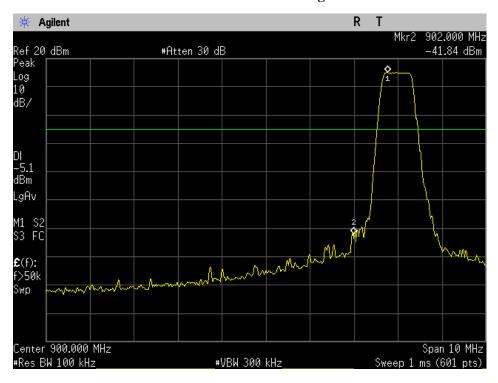
#### 10.4 Test Environmental Conditions

Temperature:	21°C
Relative Humidity:	39%
ATM Pressure:	102.0 kPa

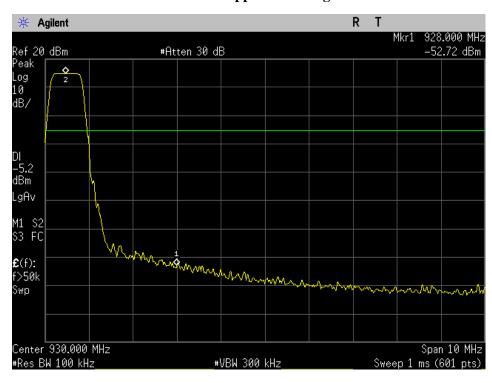
The testing was performed by Libass Thiaw on 2024-05-10 in RF Bench.

#### 10.5 Test Results

## 903 MHz Lower Band Edge



925.5 MHz Upper Band Edge



# 11 FCC §15.247(d) & ISEDC RSS-247 §5.5 - Spurious Emissions at Antenna Terminals

## 11.1 Applicable Standards

For FCC §15.247(d) and ISEDC RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

## 11.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

## 11.3 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2023-05-12	1 year
-	-	SMA cable	-	-	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

## 11.4 Test Environmental Conditions

Temperature:	21°C
Relative Humidity:	39%
ATM Pressure:	102.0 kPa

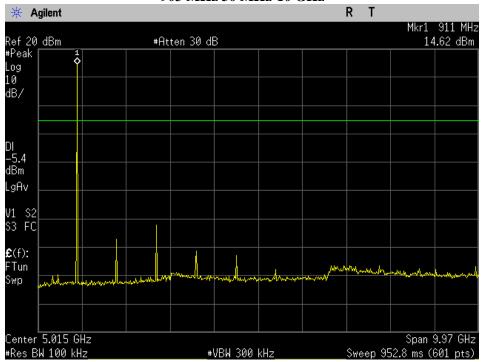
The testing was performed by Libass Thiaw on 2024-05-10 in RF Bench

#### 11.5 Test Results

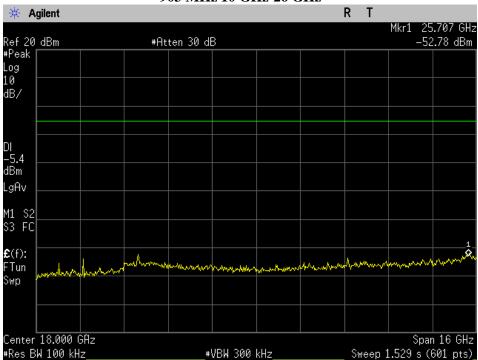
Report Number: R2401313-DTS

Please refer to the following plots for test results

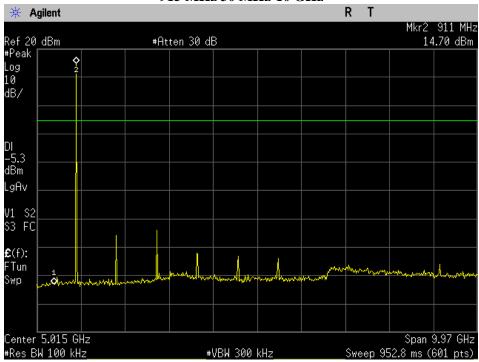
## 903 MHz 30 MHz-10 GHz



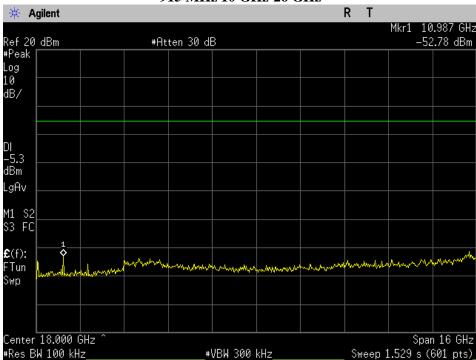
## 903 MHz 10 GHz-26 GHz



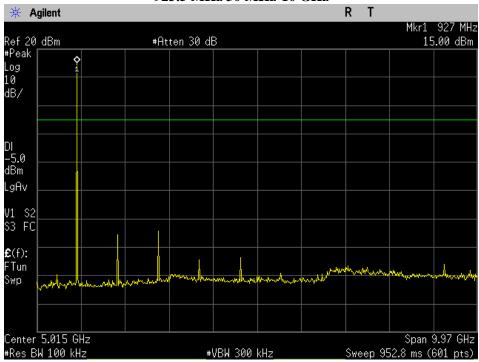
## 915 MHz 30 MHz-10 GHz



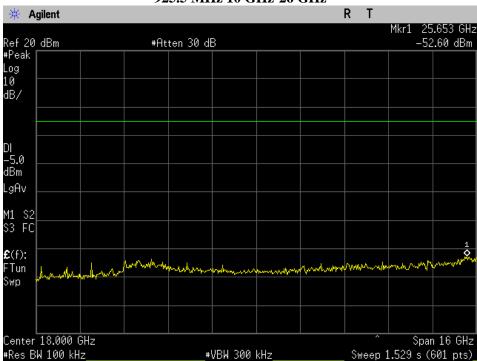
## 915 MHz 10 GHz-26 GHz



## 925.5 MHz 30 MHz-10 GHz



## 925.5 MHz 10 GHz-26 GHz



12 Annex B (Normative) - Te		
Please refer to the attachment.		

Please refer to the attachment.		

	UT Internal Photogi	1	
Please refer to the attachment.			

## 15 Annex E (Normative) - A2LA Electrical Testing Certificate



## **Accredited Laboratory**

A2LA has accredited

## BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

## **Electrical Testing**

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017

General requirements for the competence of testing and calibration laboratories. This laboratory also meets A2LA R222

- Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 21st day of December 2022.

Mr. Trace McInturff, Vice President, Accreditation Services For the Accreditation Council Certificate Number 3297.02

Valid to September 30, 2024

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope.

https://www.a2la.org/scopepdf/3297-02.pdf

--- END OF REPORT ---