Lab Code: 200707-0

FCC PART 15D

MEASUREMENT AND TEST REPORT

For

Porta Phone Company Inc.

145 DEAN KNAUSS DRIVE NARRAGANSETT, RI 02882, USA.

FCC ID: B4HDST1900

Report Type:	**Product Type:**
Original Report	Full Duplex Wireless Communication System - Handset

Test Engineer:	Jim Huang
Report Number:	RSZ11013081PP
Report Date:	2011-04-08
Reviewed By:	Merry Zhao EMC Engineer
Prepared By:	Bay Area Compliance Laboratories Corp. (Shenzhen) 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China Tel: +86-755-33320018 Fax: +86-755-33320008

TABLE OF CONTENTS

GENERAL INFORMATION

Product Description for Equipment Under Test (EUT)

The *PORTA PHONE CO., INC.'s* product, model: *ComStar S (FCC ID: B4HDST1900)* or the "EUT" as referred to in this report is an earphone of *FULL DUPLEX WIRELESS COMMUNICATION SYSTEM,* Which measures approximately: 15.6 cm (L) x 8.2 cm (W) x 18 cm (H) for model *ComStar S*, input voltage: DC 3.7V battery.

Battery information:
Rechargeable Li-polymer battery
3.7V 1000mAh

Note: The serial products, model ComStar S, ComStar Sx, ComStar D and ComStar Dx are electrically identical, which was explained in the attached product similarity declaration letter provided by manufacturer. We selected ComStar S for fully testing, and ComStar D to perform radiated emission below 1 GHz.

** All measurement and test data in this report was gathered from production sample serial number: 1101005 (Assigned by BACL, Shenzhen). The EUT was received on 2011-01-30.*

Objective

This document is a test report based on the Electromagnetic Interference (EMI) tests performed on the EUT. The EMI measurements were performed according to the measurement procedure described in ANSI C63.17-2006, and ANSI C64.3 2009.

The tests were performed in order to determine compliance with FCC Part 15, Subpart D, and section 15.203, 15.315, 15.317, 15.319 and 15.323 rules.

Related Submittal(s)/Grant(s)

FCC Part 15D submission of Base portion with FCC ID: B4HCS1900.

Test Methodology

All measurements contained in this report were conducted with ANSI C63.17-2006, American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the range of 9 kHz to 40 GHz. All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratories Corp. (Shenzhen). The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

Test Facility

The Test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect test data is located in the 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China.

Test site at Bay Area Compliance Laboratories Corp. (Shenzhen) has been fully described in reports submitted to the Federal Communication Commission (FCC). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on December 06, 2010. The facility also complies with the radiated and AC line conducted test site criteria set forth in ANSI C63.4-2009.

The Federal Communications Commission has the reports on file and is listed under FCC Registration No.: 382179. The test site has been approved by the FCC for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, Bay Area Compliance Laboratories Corp. (Shenzhen) is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (Lab Code 200707-0).

The current scope of accreditations can be found at http://ts.nist.gov/Standards/scopes/2007070.htm

SYSTEM TEST CONFIGURATION

Description of Test Configuration

The system was configured for testing in TBR6 mode which is provided by the manufacturer.

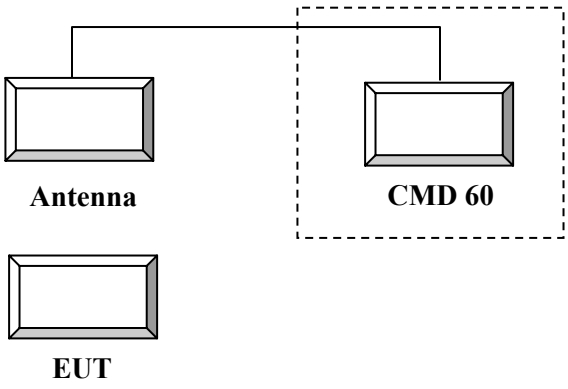
Equipment Modifications

The conducted items were tested under TBR6 mode.

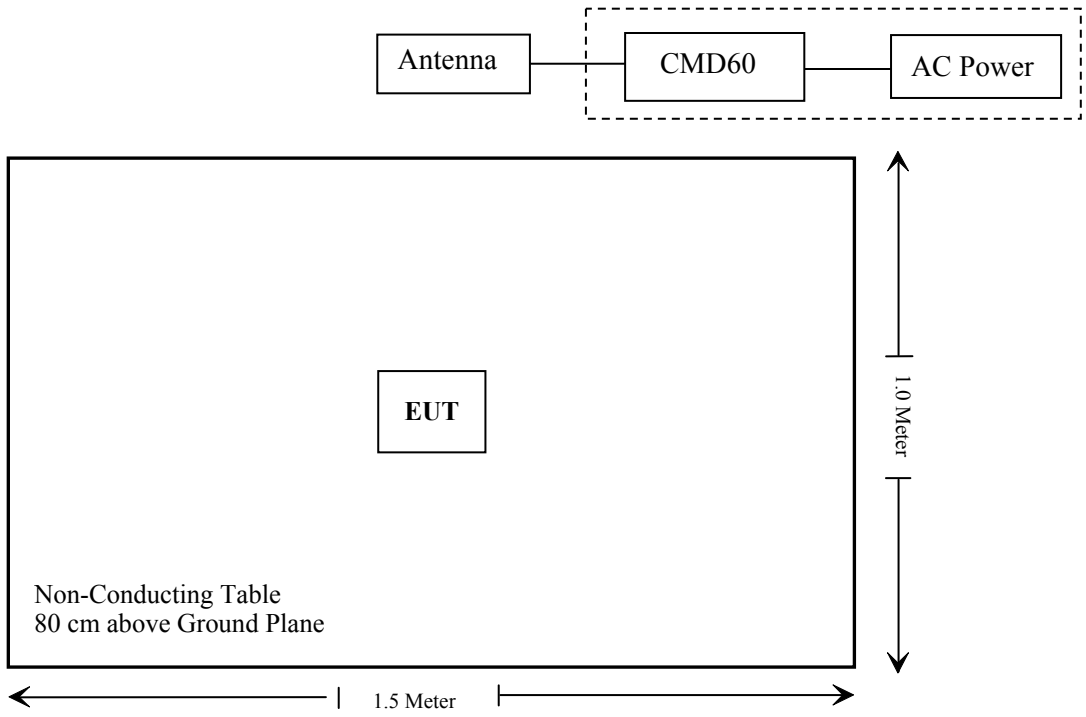
Local Support Equipment List and Details

Manufacturer	Description	Model	Serial Number	FCC ID
R & S	Digital Radio-Communication Tester	CMD60	829902/026	DoC

Configuration of Test Setup



Block Diagram of Test Setup



SUMMARY OF TEST RESULTS

FCC Rules	Description of Test	Result
§15.319 (i); §2.1093	RF Exposure Info	Compliance
§15.317, §15.203	Antenna Requirement	Compliance
§15.319 (e)	Antenna Gain	Compliance
§15.315, §15.207	AC Line Conducted Emission	N/A*
§15.323 (a)	Emission Bandwidth	Compliance
§15.319 (c)	Peak Transmit Power	Compliance
§15.319 (d)	Power Spectral Density	Compliance
§15.323 (d)	Emission Inside and Outside the sub-band	Compliance
§15.319 (g)	Radiated Spurious Emissions	Compliance
§15.323 (f)	Frequency Stability	Compliance
§15.323 (c)(e) §15.319 (f)	Specific Requirements for UPCS	Compliance

Note: EUT is battery operation.

FCC §15.319 (i) & §2.1093 - RF EXPOSURE INFORMATION

Applicable Standard

According to FCC §15.319 (i) Unlicensed PCS devices are subject to the radiofrequency radiation exposure requirements specified in §§ 1.1307(b), 2.1091 and 2.1093 of this chapter, as appropriate. All equipment shall be considered to operate in a ‘‘general population/uncontrolled’’ environment. Applications for equipment authorization of devices operating under this section must contain a statement confirming compliance with these requirements for both fundamental emissions and unwanted emissions. Technical information showing the basis for this statement must be submitted to the Commission upon request.

According to KDB 447498 D01 Mobile Portable RF Exposure v04 1) c): Unless excluded by specific FCC test procedures, portable devices with output power > 60/f(GHz) mW shall include SAR data for equipment approval.

RF Exposure Evaluation

Max Peak output power:

1921.536 MHz: 18.63 dBm = 72.95 mW
The source-based average power = 72.95mW/12=6.08 mW
60/f (GHz) = 60/1.921536 = 31.23 mW
The source-based average power is less than 60/f(GHz)

So the SAR evaluation can be exempted.

FCC §15.317 & §15.203 - ANTENNA REQUIREMENT

Applicable Standard

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.

Antenna Connector Construction

This product has two integrated antennas arrangement; please refer to the internal photos. The maximum gains is 2 dBi, fulfill the requirement of this section.

Result: Compliance.

FCC §15.319 (e) - ANTENNA GAIN

Applicable Standard

According to FCC §15.319 (e):

The peak transmit power shall be reduced by the amount in decibels that the maximum directional gain of the antenna exceeds 3 dBi.

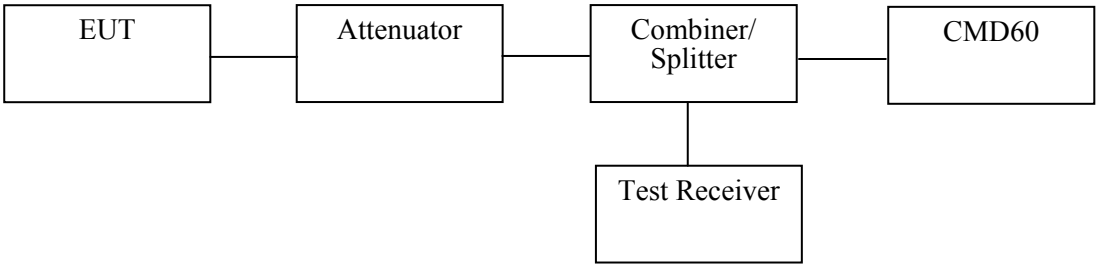
Result: The antenna gain is 2 dBi which provided by manufacturer.

FCC §15.323 (a) - EMISSION BANDWIDTH

Applicable Standard

The emission bandwidth is measured in accordance with ANSI C63.17 sub-clause 6.1.3 using the setup below

Test Setup :



The width, in Hz, of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, that is 26 dB down relative to the maximum level of the modulated carrier. It is based on the use of measurement instrumentation employing a peak detector function with an instrument resolution bandwidth approximately equal to 1% of the emission band-width of the device under measurement. [Extraction from 47 CFR 15, subpart D, 15.303 (C)].

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

Test Procedure

Using the manufacturer's information on occupied bandwidth set the spectrum analyzer as follows:

Resolution bandwidth	1.0% of the emission bandwidth (as close as possible)
Video bandwidth	>3 times the resolution bandwidth
Number of sweeps	sufficient to stability the trace
Detection mode	peak detection with maximum hold

Test Data

Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	50 %
ATM Pressure:	100.0 kPa

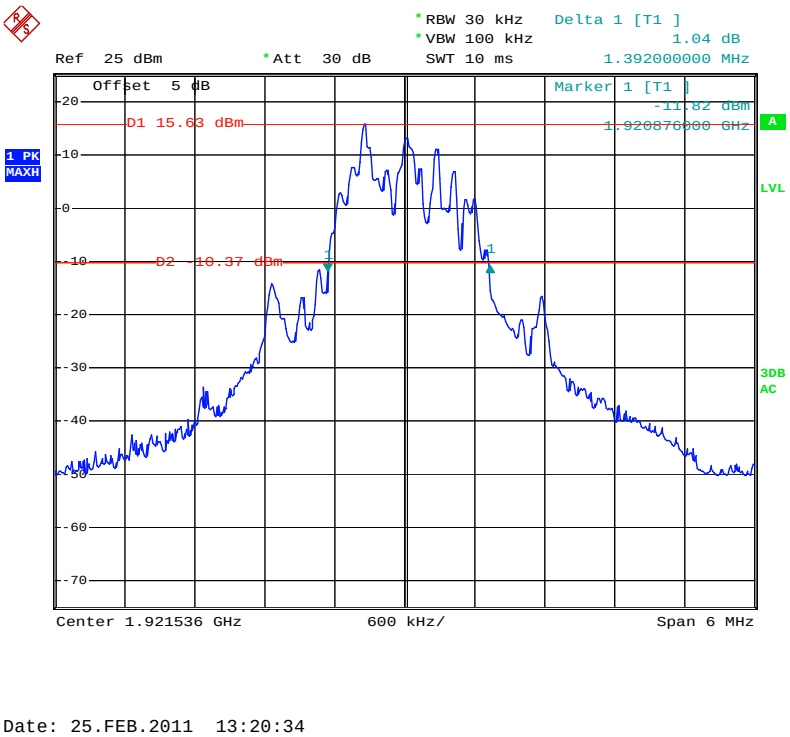
The testing was performed by Jim Huang on 2011-02-25.

Test Result: Compliance, please refer to the following table and plots.

Test Mode: Transmitting

Channel	Frequency (MHz)	26 dB Emission Bandwidth (MHz)	Limit
Low	1921.536	1.392	50 kHz < OBW <2.5 MHz
Middle	1924.992	1.392	50 kHz < OBW <2.5 MHz
High	1928.448	1.392	50 kHz < OBW <2.5 MHz

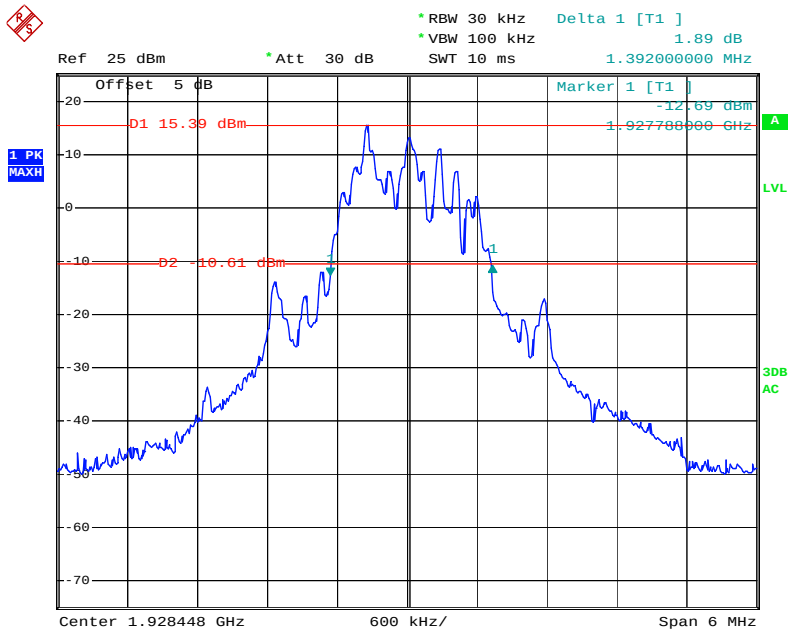
Low Channel



Middle Channel

Date: 25.FEB.2011 13:19:06

High Channel



Date: 25.FEB.2011 13:17:02

FCC §15.319 (c) - PEAK TRANSMIT POWER

Applicable Standard

The peak power output as measured over an interval of time equal to the transmission-burst duration of the device under all conditions of modulation. [47 CFR 15, subpart D, 15.303 (f)].

Part 15.323(a) & Part 15.319(c) Peak Transmit Power:
The limit for Peak Transmit Power (PTP) is calculated using the following formula:
PTP = 100 μ W x $(EBW)^{1/2}$
EBW is the transmit emission bandwidth in Hz determined in the other test item:
EBW = 1392000 Hz
PTP = 100 μ W x $(1392000)^{1/2}$ = 20.72 dBm

The peak transmitter power is measured in accordance with ANSI C63.17-2006 Clause 6.1.2.

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

Test Procedure

Using the manufacturer's information on occupied bandwidth set the spectrum analyzer as follows:

RBW	≥ Emission bandwidth
Video bandwidth	≥ RBW
Span	Zero
Center frequency	Nominal center frequency of channels
Amplitude scale	Log (linear may be used if analyzer has sufficient linear dynamic range and accuracy)
Detection	Peak detection
Trigger	Video
Sweep rate	Sufficiently rapid to permit the transmit pulse to be resolved accurately

Test Data

Environmental Conditions

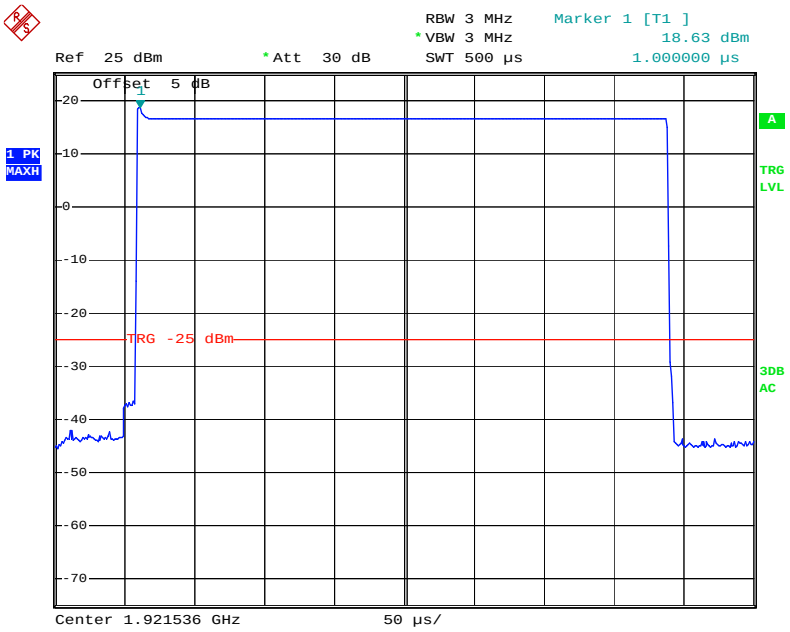
Temperature:	20 ° C
Relative Humidity:	56 %
ATM Pressure:	100.0 kPa

The testing was performed by Jim Huang on 2011-02-23.

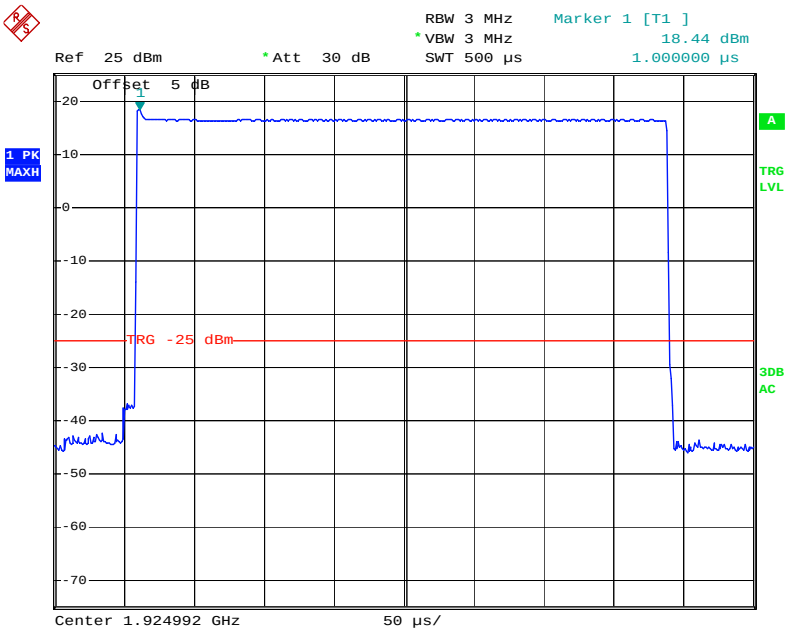
Test Result: Compliance, please refer to the following table and plots.

Frequency (MHz)	Peak Transmit Power (dBm)	Limit (dBm)
1921.536	18.63	20.72
1924.992	18.44	20.72
1928.448	18.39	20.72

Low Channel

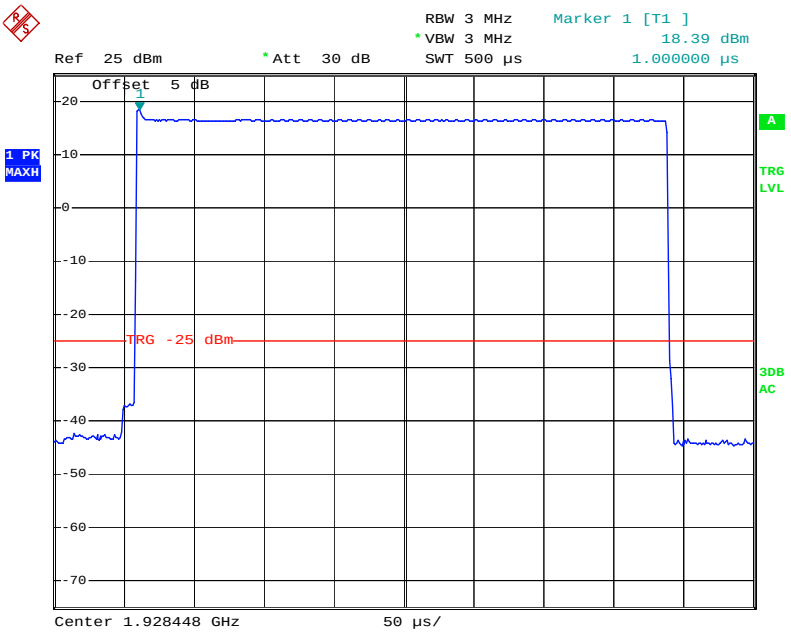


Middle Channel



Date: 23.FEB.2011 09:33:38

High Channel



Date: 23.FEB.2011 09:33:10

FCC §15.319 (d) - POWER SPECTRAL DENSITY

Applicable Standard

The average pulse energy in a 3 kHz bandwidth is divided by the pulse duration.

The power spectral density shall not exceed 3 mW in any 3 kHz bandwidth as measured with a spectrum analyzer having a resolution bandwidth of 3 kHz.

The power spectral density is measured in accordance with ANSI C63.17.2006 Clause 6.1.5.

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-10	2011-11-10

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

Test Procedure

Using the manufacturer's information on occupied bandwidth set the spectrum analyzer as follows:

RBW	3kHz
Video bandwidth	≥ 3 × RBW
Span	Zero span at frequency with the maximum level (frequency determined in 6.1.3 if the same type of signal (continuous versus burst) was used in 6.1.3)
Center frequency	Spectral peak as determined in 6.1.3
Sweep time	For burst signals, sufficient to include essentially the entire maximum length burst at the output of a 3 kHz filter (e.g., maximum input burst duration plus 600 µs). For continuous signals, 20 ms.
Amplitude scale	Log power
Detection	Sample detection and averaged for a minimum of 100 sweeps
Trigger	External or internal

Test Data

Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	50 %
ATM Pressure:	100.0 kPa

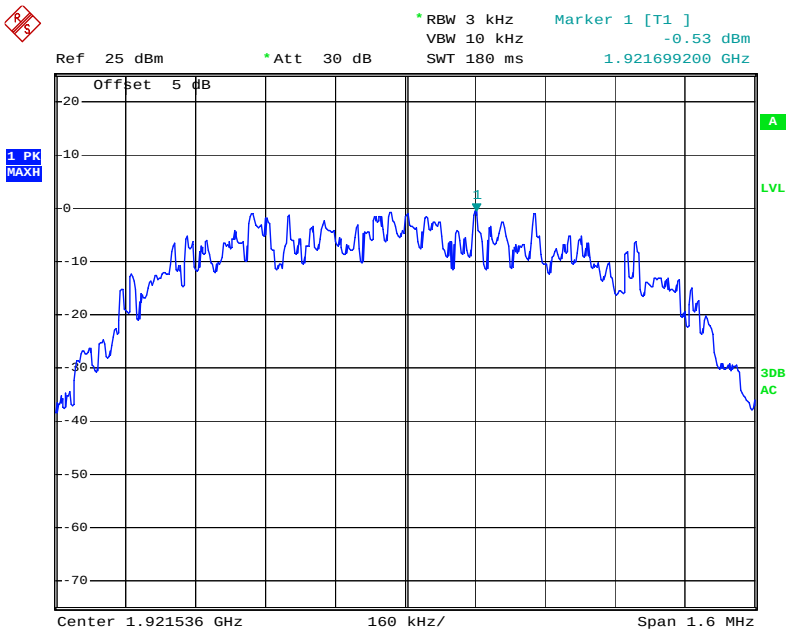
The testing was performed by Jim Huang on 2011-03-09.

Test Mode: Transmitting

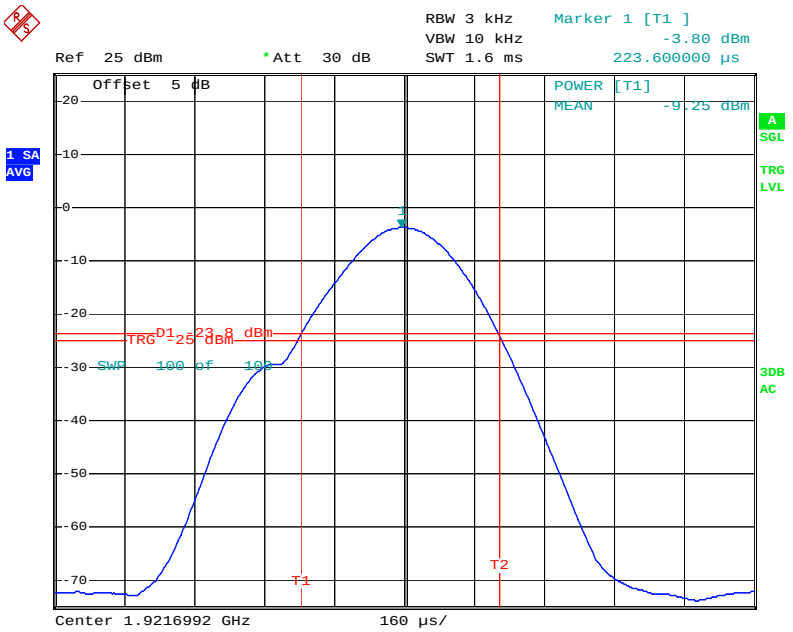
Test Result: Compliance, please refer to following tables and plots

Frequency (MHz)	Power Spectral Density		Limit (mW/3kHz)	Result
	(dBm/3kHz)	(mW/3kHz)		
1921.536	-9.25	0.12	3	Pass
1924.992	-7.61	0.17	3	Pass
1928.448	-8.30	0.15	3	Pass

Low Channel

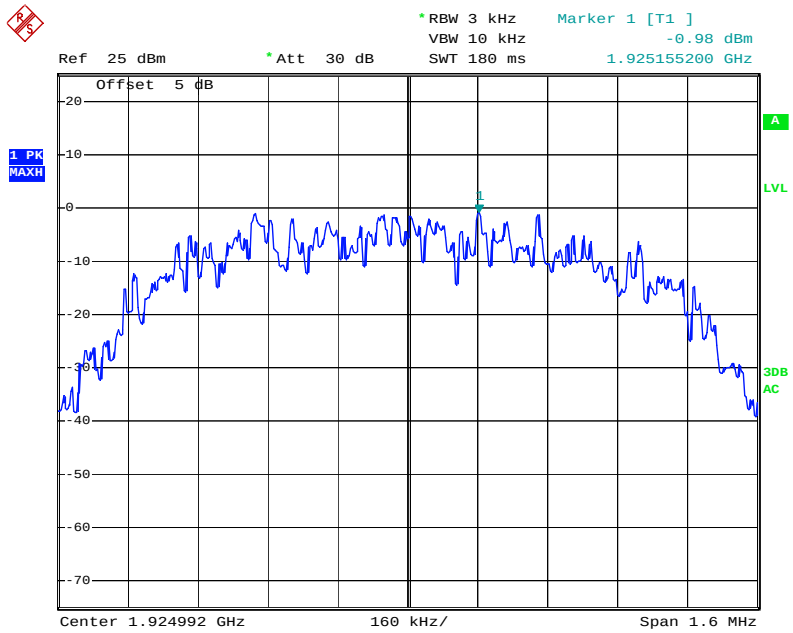


Date: 9.MAR.2011 04:36:21

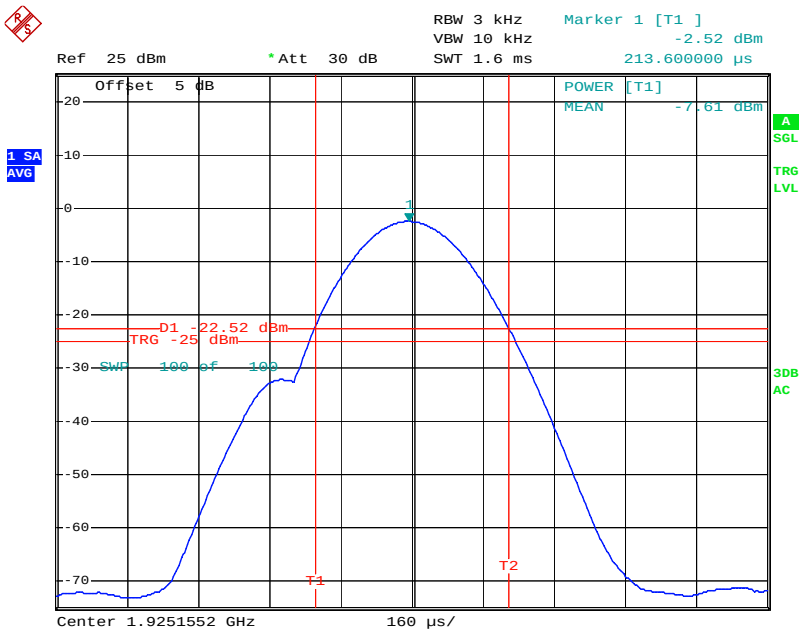


Date: 9.MAR.2011 04:37:55

Middle Channel

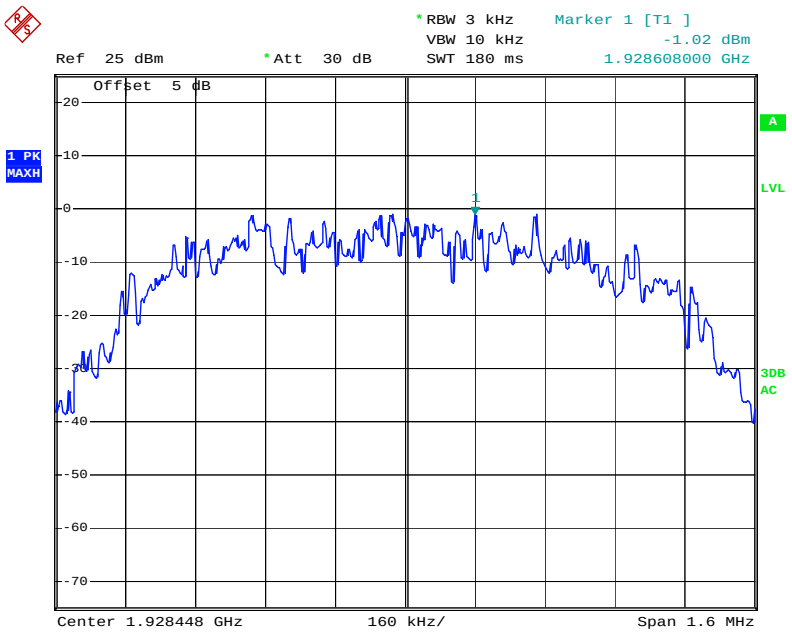


Date: 9.MAR.2011 04:40:03

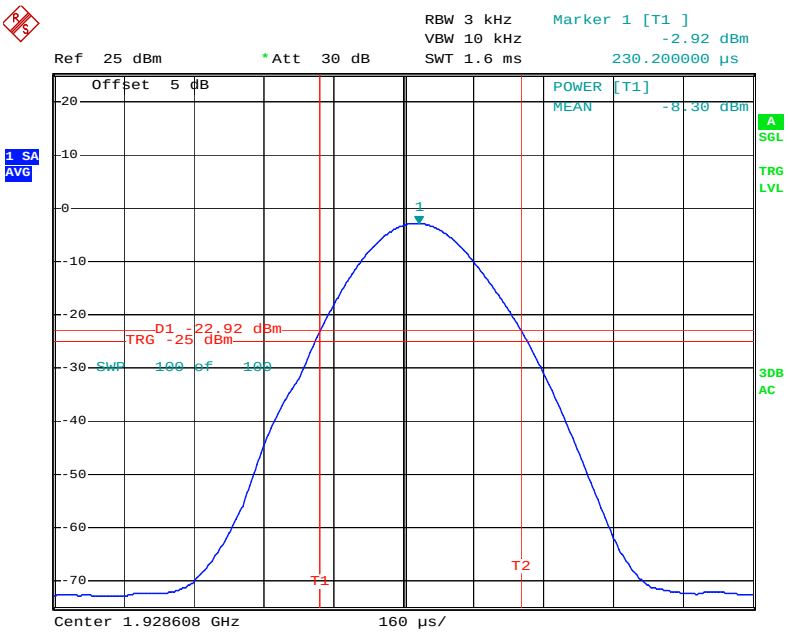


Date: 9.MAR.2011 04:41:50

High Channel



Date: 9.MAR.2011 04:43:36



Date: 9.MAR.2011 04:44:47

FCC §15.323 (d) - EMISSION INSIDE AND OUTSIDE THE SUB-BAND

Applicable Standard

Emissions inside the sub-band must comply with the following emission mask:

1. In the bands between 1B and 2B measured from the center of the emission bandwidth the total power emitted by the device shall be at least 30 dB below the transmit power permitted for that device;
2. in the bands between 2B and 3B measured from the center of the emission bandwidth the total power emitted by an intentional radiator shall be at least 50 dB below the transmit power permitted for that radiator;
3. in the bands between 3B and the sub-band edge the total power emitted by an intentional radiator in the measurement bandwidth shall be at least 60 dB below the transmit power permitted for that radiator.

   Where B = emission bandwidth

Emission Outside the sub-band shall be attenuated below a reference power of 112 mw (20.5 dBm) as follows:

1. 30 dB between the sub-band and 1.25 MHz above or below the sub-band;
2. 50 dB between 1.25 and 2.5 MHz above or below the sub-band;
3. 60 dB at 2.5 MHz or greater above or below the sub-band.

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10
HP	Spectrum Analyzer	8564E	3943A01781	2010-03-09	2011-03-09

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

Test Data

Environmental Conditions

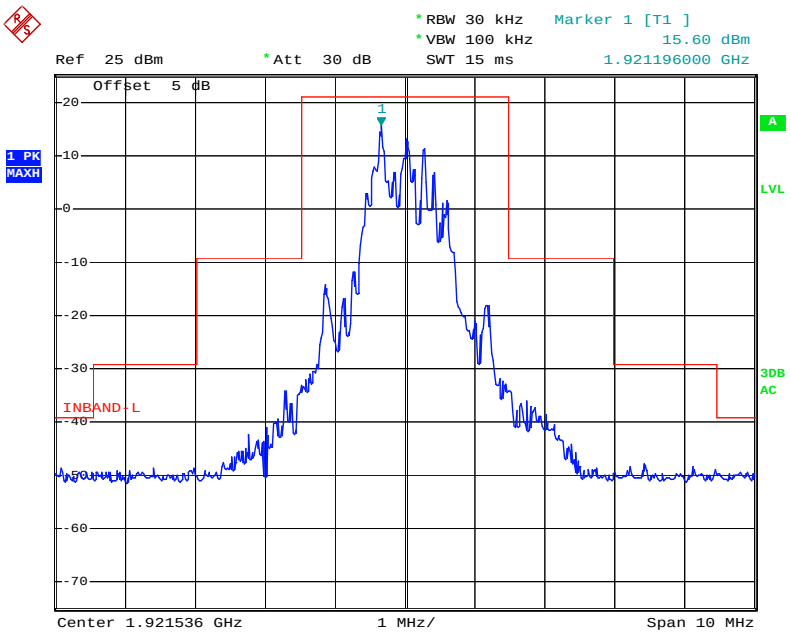
Temperature:	20 ° C
Relative Humidity:	50 %
ATM Pressure:	100.0 kPa

The testing was performed by Jim Huang on 2011-02-25 and 2011-03-09.

Test Mode: Transmitting

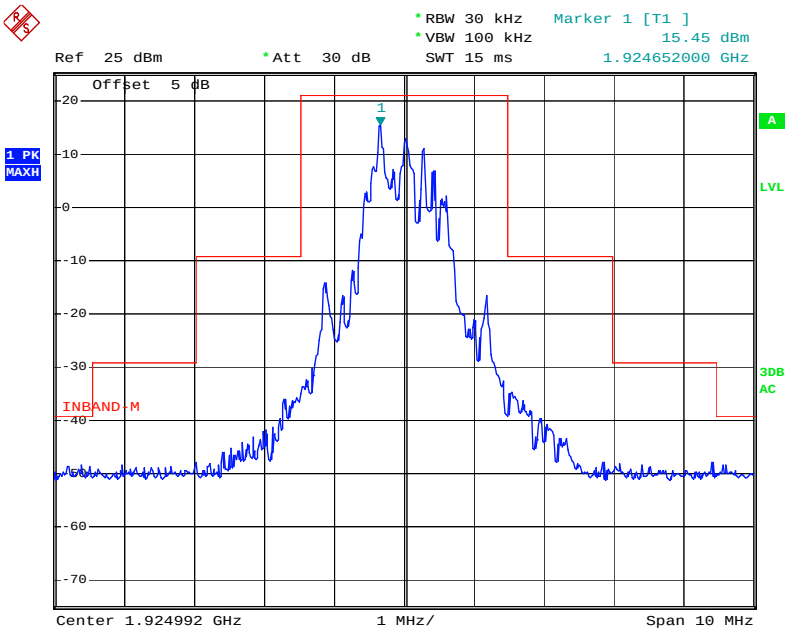
Test Result: Compliance, please refer to following plots

Low Channel (Unwanted Emission inside the Sub-band)



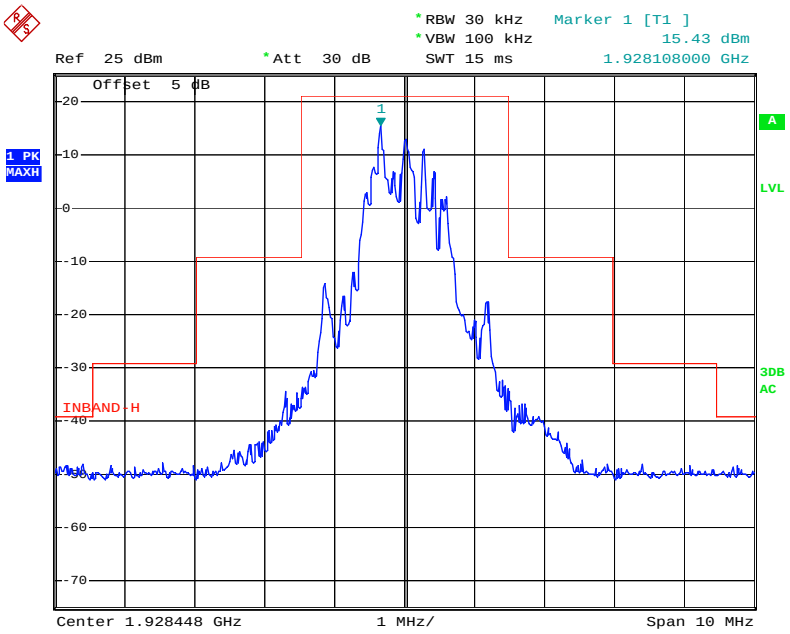
Date: 25.FEB.2011 13:10:35

Middle Channel (Unwanted Emission inside the Sub-band)



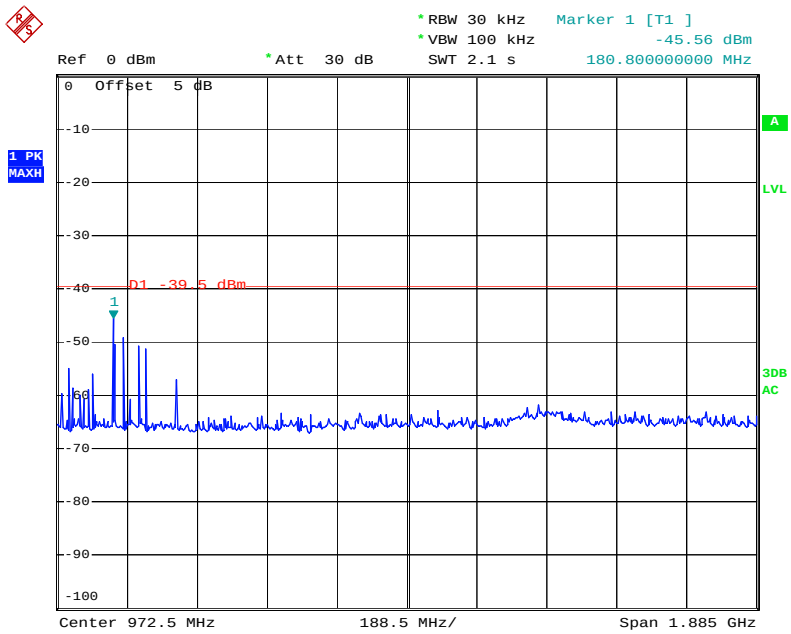
Date: 25.FEB.2011 13:11:28

High Channel (Unwanted Emission inside the Sub-band)

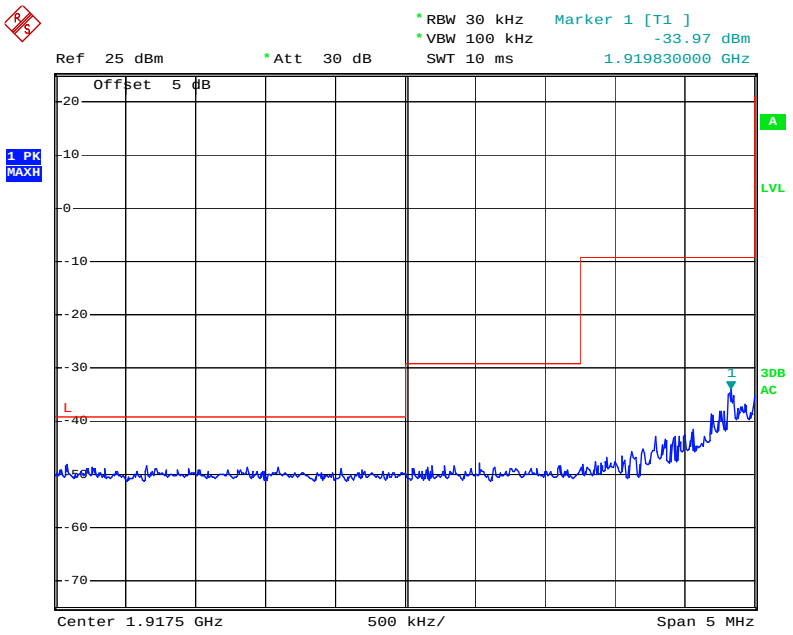


Date: 25.FEB.2011 13:06:05

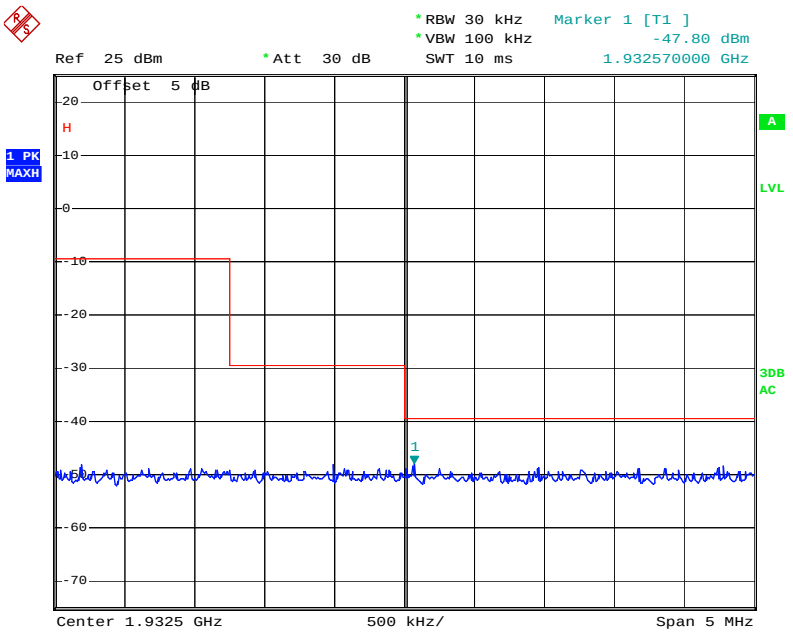
Low Channels (Unwanted Emission outside the Sub-band)



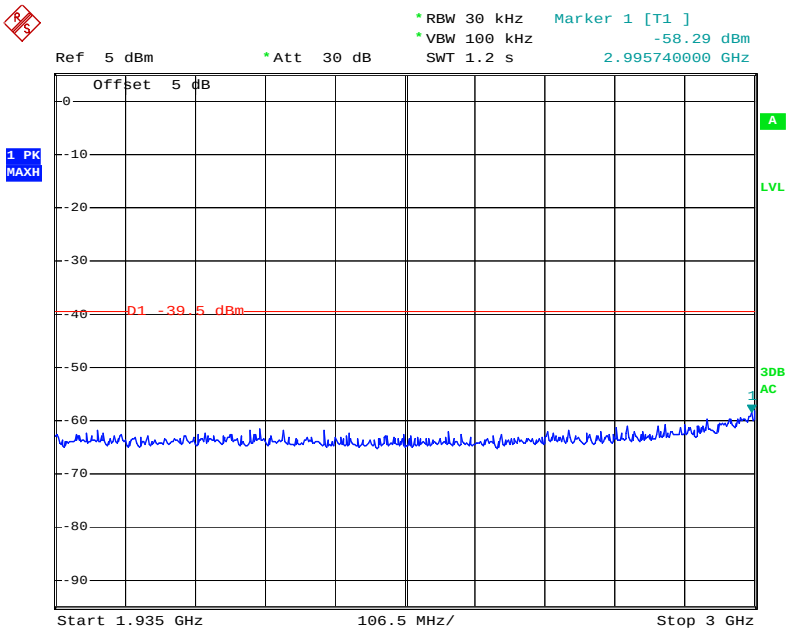
Date: 25.FEB.2011 13:02:20



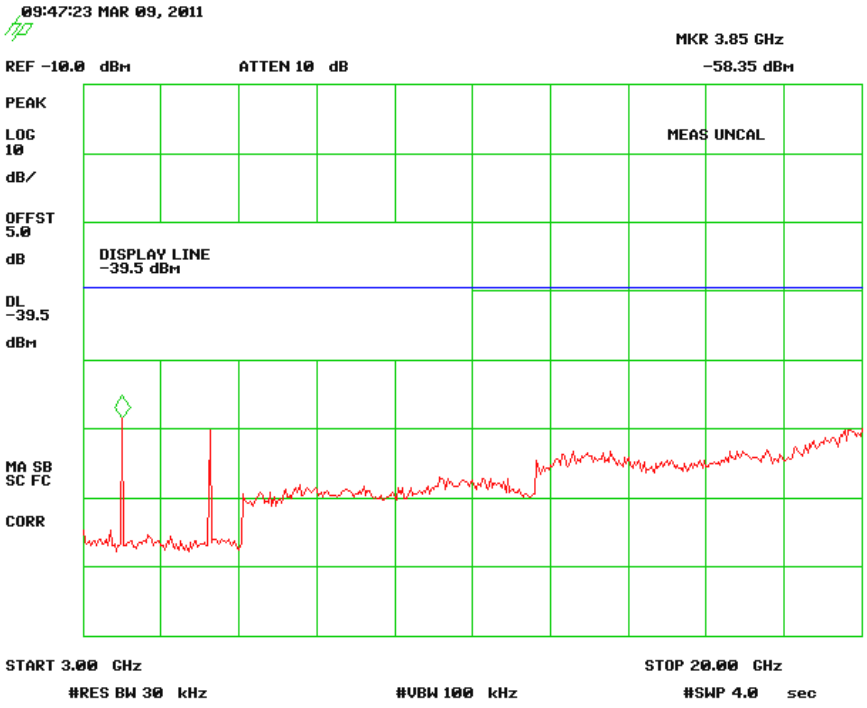
Date: 25.FEB.2011 13:13:03



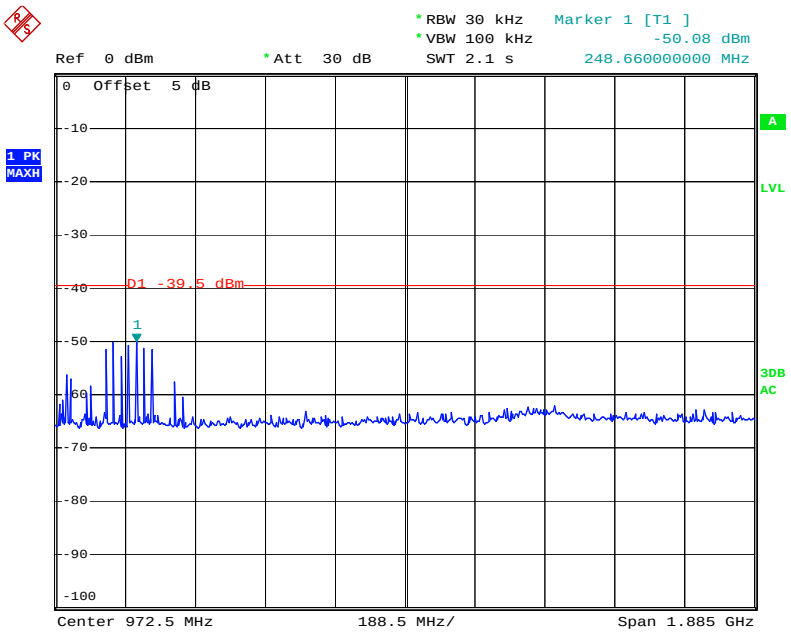
Date: 25.FEB.2011 13:09:11



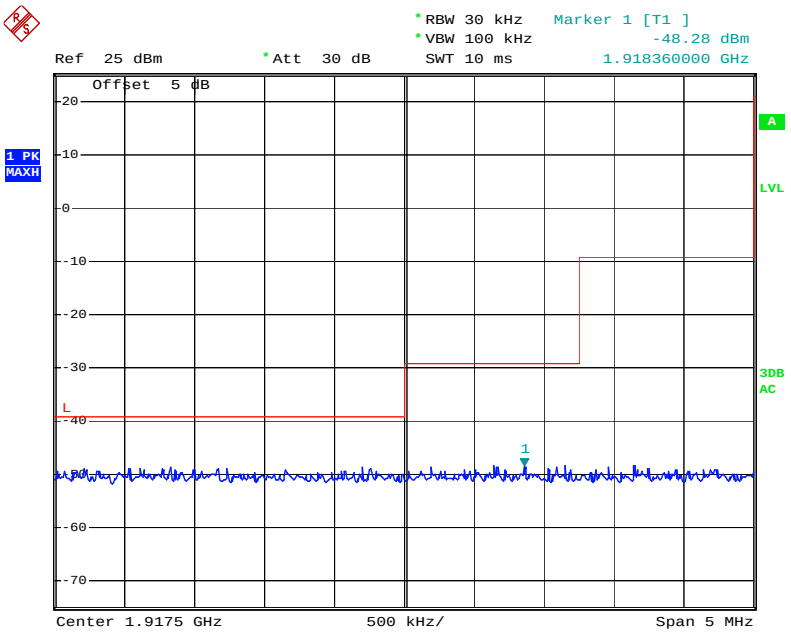
Date: 9.MAR.2011 02:15:15



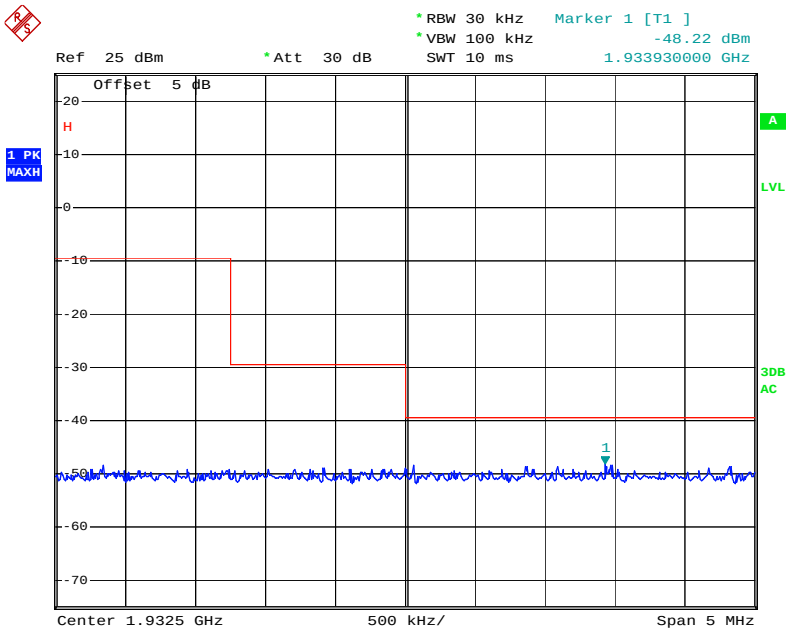
Middle Channels (Unwanted Emission outside the Sub-band)



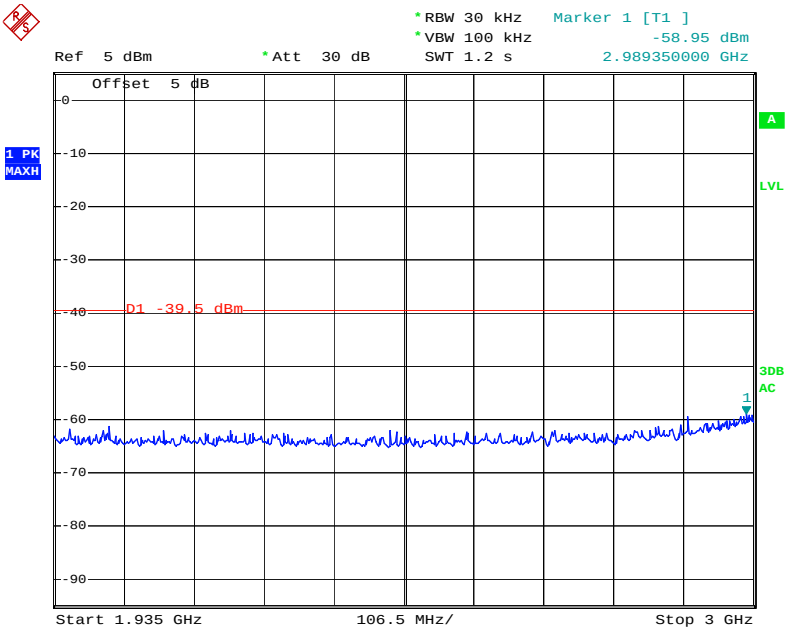
Date: 25.FEB.2011 13:01:41



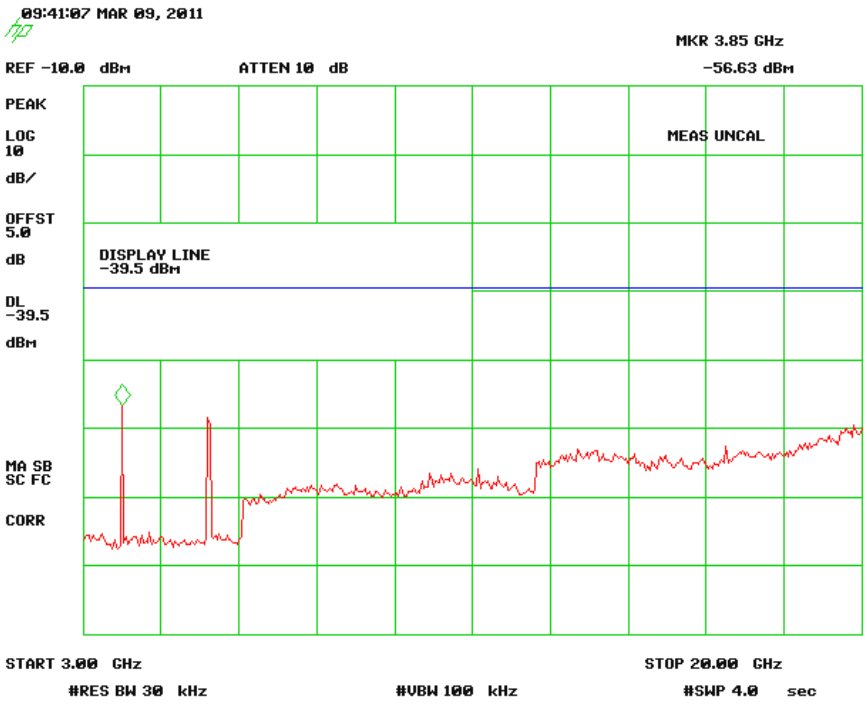
Date: 25.FEB.2011 13:12:19



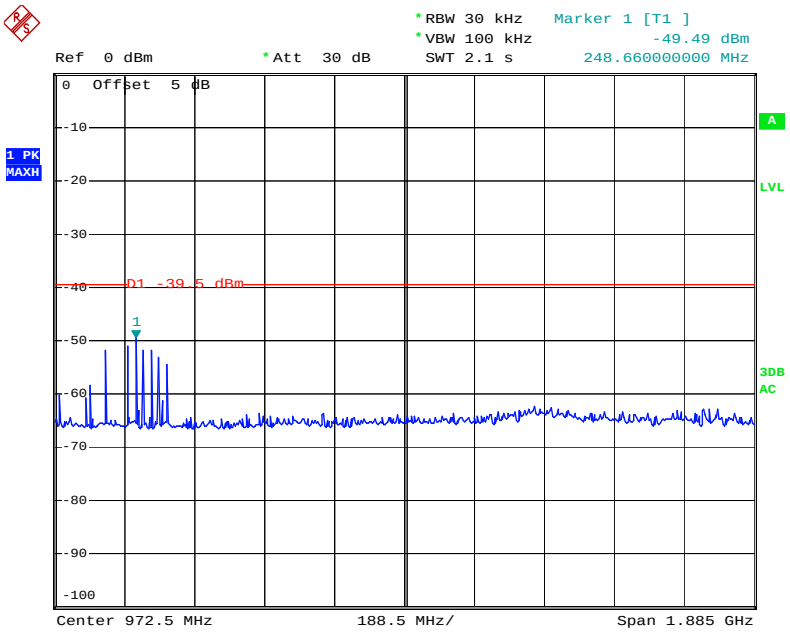
Date: 25.FEB.2011 13:08:44



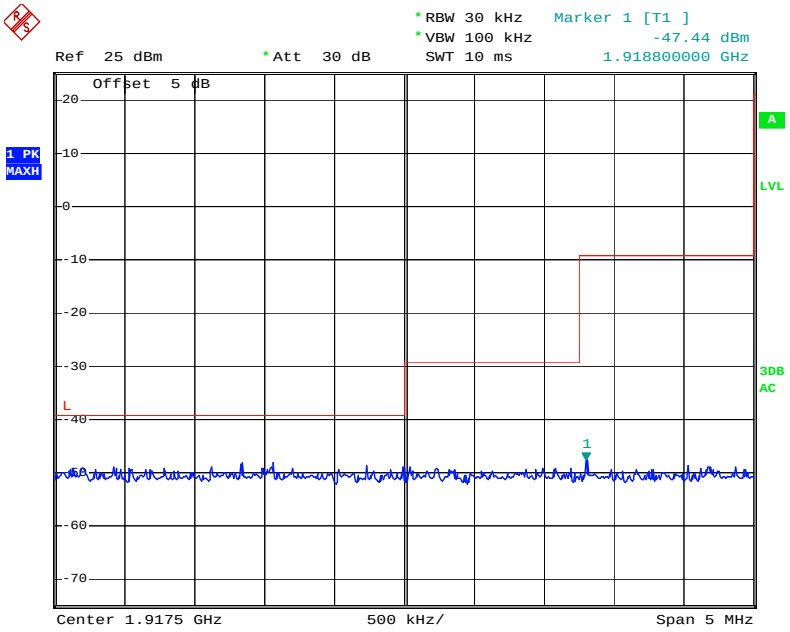
Date: 9.MAR.2011 02:14:43



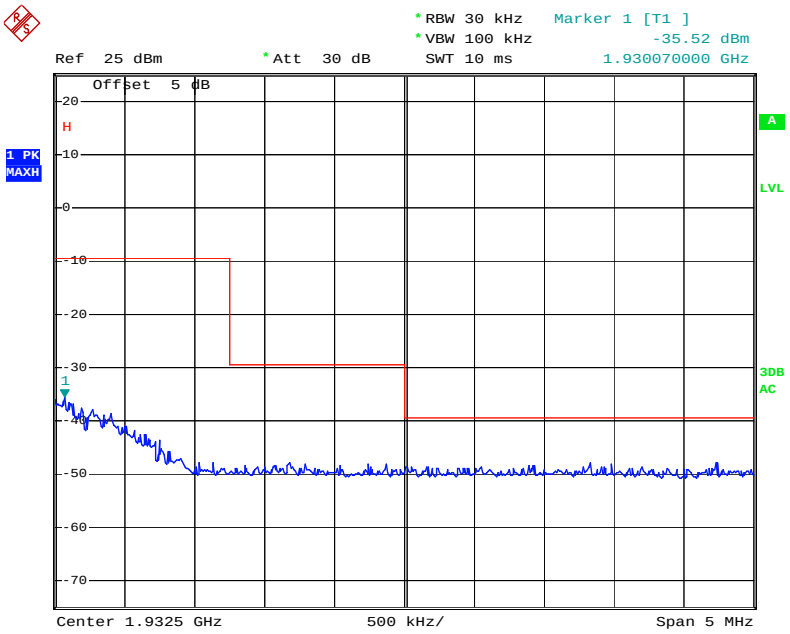
High Channels (Unwanted Emission outside the Sub-band)



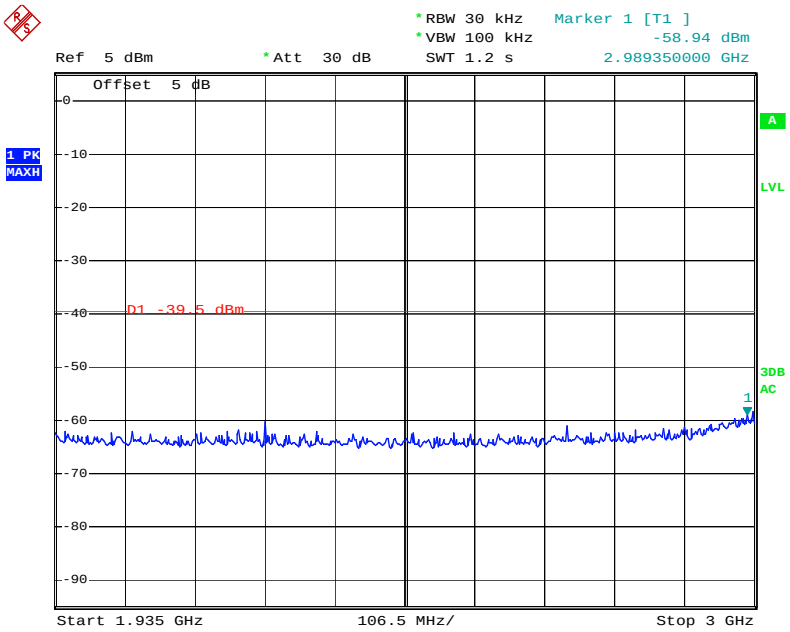
Date: 25.FEB.2011 13:03:19



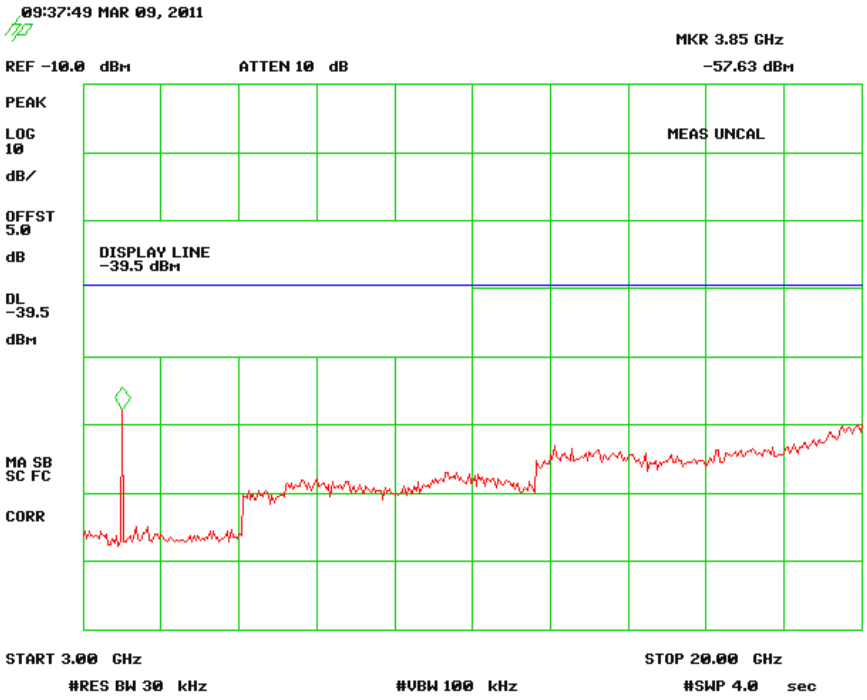
Date: 25.FEB.2011 13:13:26



Date: 25.FEB.2011 13:08:15



Date: 9.MAR.2011 02:16:32



FCC §15.319 (g) - RADIATED SPURIOUS EMISSIONS

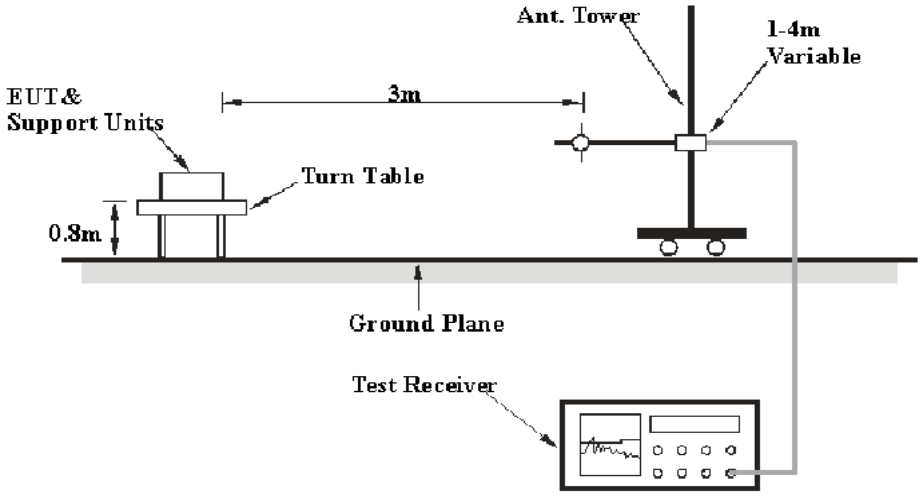
Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in 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.

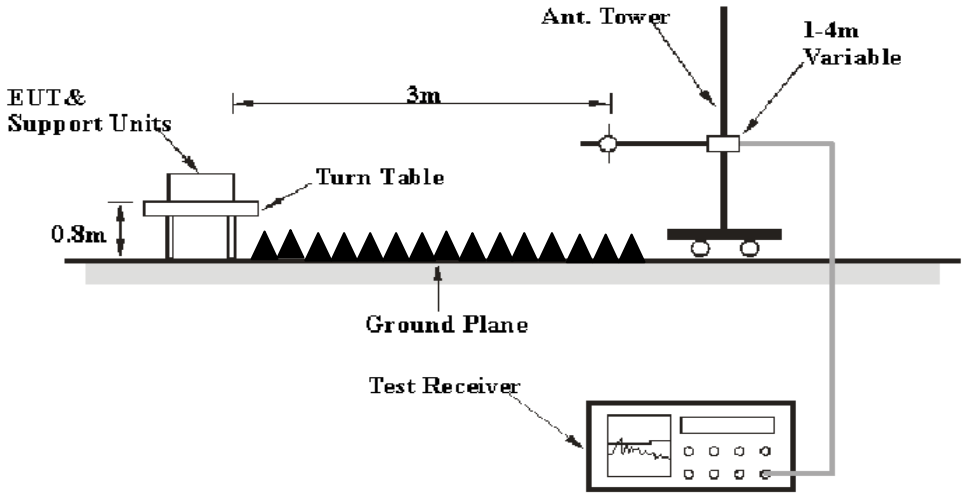
Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the best estimate of the uncertainty of a radiation emissions measurement at Bay Area Compliance Laboratories Corp. (Shenzhen) is ±4.0 dB (k=2, 95% level of confidence).

EUT Setup

Below 1 GHz:



Above 1 GHz:



The radiated emission tests were performed in the 3 meters chamber B test site, using the setup accordance with the ANSI C63.17 - 2006. The specification used was the FCC 15.209 and FCC 15.319(g) limits.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 20 GHz.

During the radiated emission test, the EMI test receiver & Spectrum Analyzer Setup were set with the following configurations:

Frequency Range	***RBW***	***Video B/W***
30 MHz – 1000 MHz	100 kHz	300 kHz
Above 1 GHz	1 MHz	3 MHz

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
HP	Amplifier	HP8447D	2944A09795	2010-08-02	2011-08-02
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10
Sunol Sciences	Broadband Antenna	JB1	A040904-1	2010-03-11	2011-03-10
Mini-circuits	Pre-amplifier	ZVA-213+	N/A	2010-09-12	2011-09-11
Sunol Sciences	Horn Antenna	DRH-118	A052604	2010-05-05	2011-05-04
Rohde & Schwarz	Spectrum Analyzer	FSEM30	849720/019	2010-07-08	2011-07-07

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

Test Procedure

For the radiated emissions test, the EUT was powered by battery.

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

Data was recorded in Quasi-peak detection mode for frequency range of 30 MHz-1 GHz and peak and Average detection modes for frequencies above 1 GHz.

Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain from the Meter Reading. The basic equation is as follows:

Corrected Amplitude = Meter Reading + Antenna Factor + Cable Loss- Amplifier Gain

The "**Margin**" column of the following data tables indicates the degree of compliance with 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 = Limit - Corrected Amplitude

Test Results Summary

According to the recorded data in following table, the EUT complied with the FCC 15.209 and 15.319 (g), with the worst margin reading of:

Below 1 GHz:

3.1 dB at **518.393000 MHz** in the **Vertical** polarization for model ComStar S
3.6 dB at **511.478250 MHz** in the **Vertical** polarization for model ComStar D

Above 1 GHz:

0.48 dB at **11570.688 MHz** in the **Horizontal** polarization **(High Channel)**

Test Data

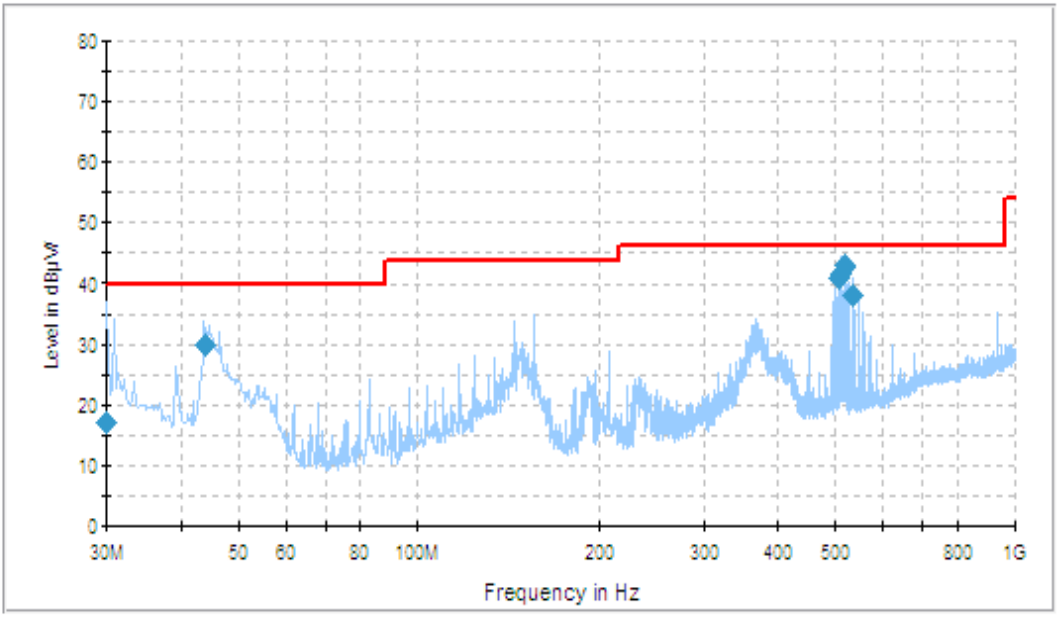
Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	50 %
ATM Pressure:	100.0 kPa

The testing was performed by Jim Huang on 2011-03-09.

1) Below 1 GHz:

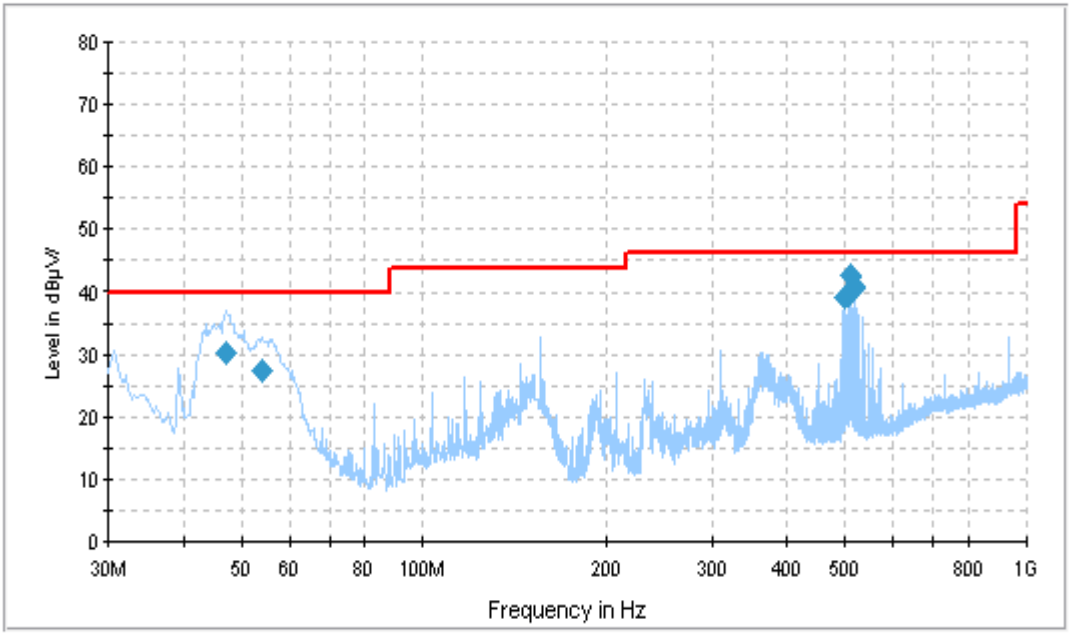
Test Mode: Transmitting for model ComStar S



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Position (deg)	Correction Factor (dB)	Limit (dBµV/m)	Margin (dB)
518.393000	42.9	102.0	V	114.0	-8.0	46.0	3.1*
511.486250	41.8	104.0	V	108.0	-8.2	46.0	4.2
504.581750	41.0	123.0	V	107.0	-8.3	46.0	5.0
532.236000	38.2	103.0	V	111.0	-7.8	46.0	7.8
44.005500	29.9	104.0	V	223.0	-14.5	40.0	10.1
30.038875	17.1	125.0	V	231.0	-5.4	40.0	22.9

*Within measurement uncertainty!

Test Mode: Transmitting for model ComStar D



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Position (deg)	Correction Factor (dB)	Limit (dBµV/m)	Margin (dB)
511.478250	42.4	103.0	V	290.0	-8.2	46.0	3.6*
518.407250	40.9	104.0	V	280.0	-8.0	46.0	5.1
504.576250	39.7	102.0	V	290.0	-8.3	46.0	6.3
497.657000	39.2	105.0	V	292.0	-8.4	46.0	6.8
47.161500	30.4	104.0	V	130.0	-16.1	40.0	9.6
53.985250	27.3	123.0	V	226.0	-17.9	40.0	12.7

**Within measurement uncertainty!*

2) Above 1 GHz:

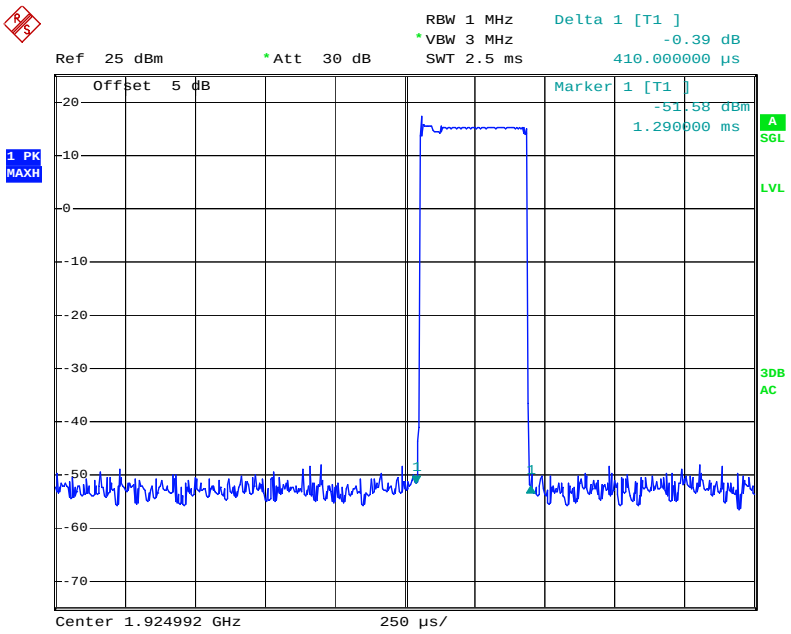
Freq. (MHz)	S.A. Reading (dBµV)	Detector PK/QP/Ave	Direction Degree	Test Antenna			Cable Loss (dB)	Pre-Amp. Gain (dB)	Corrected Amplitude (dBµV/m)	FCC Part 15.319/209		
				Height (m)	Polar (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	Remarks
Low Channel												
11529.216	51.97	PK	175	1.6	H	41	6.69	26.28	73.38	74	0.62*	Harmonic
11529.216	49.33	PK	120	1.7	V	40.4	6.69	26.28	70.14	74	3.86*	Harmonic
5764.608	53	PK	110	1.4	H	37.4	4.57	26.68	68.29	74	5.71	Harmonic
9607.680	48.83	PK	190	1.6	V	39.9	5.98	26.42	68.29	74	5.71	Harmonic
9607.680	47.5	PK	116	1.2	H	41.1	5.98	26.42	68.16	74	5.84	Harmonic
5764.608	51.5	PK	87	1.6	V	36.2	4.57	26.68	65.59	74	8.41	Harmonic
7686.144	47.67	PK	90	1.4	H	39	5.27	26.64	65.3	74	8.7	Harmonic
7686.144	48.67	PK	120	1.8	V	37.7	5.27	26.64	65	74	9.00	Harmonic
3843.072	50.83	PK	213	1	H	33.9	3.73	26.87	61.59	74	12.41	Harmonic
3843.072	46.21	PK	190	1.5	V	33	3.73	26.87	56.07	74	17.93	Harmonic
Middle Channel												
11549.942	52.33	PK	130	1.7	V	40.4	6.69	26.28	73.14	74	0.86*	Harmonic
11549.942	49.5	PK	200	1	H	41.0	6.69	26.28	70.91	74	3.09*	Harmonic
9624.960	48.7	PK	120	1.3	H	41.1	5.98	26.42	69.36	74	4.64	Harmonic
9624.960	46.15	PK	140	1.3	V	39.9	5.98	26.42	65.61	74	8.39	Harmonic
7699.968	46.6	PK	166	1.1	H	39.0	5.27	26.64	64.23	74	9.77	Harmonic
5774.976	48.73	PK	120	1.7	H	37.4	4.57	26.68	64.02	74	9.98	Harmonic
7699.968	46.67	PK	140	1.8	V	37.7	5.27	26.64	63	74	11.00	Harmonic
5774.976	48.31	PK	10	1	V	36.2	4.57	26.68	62.4	74	11.6	Harmonic
3849.984	51.5	PK	220	1.5	H	33.9	3.73	26.87	62.26	74	11.74	Harmonic
3849.984	46.88	PK	173	1.7	V	33.0	3.73	26.87	56.74	74	17.26	Harmonic
High Channel												
11570.688	52.11	PK	200	1.5	H	41.0	6.69	26.28	73.52	74	0.48*	Harmonic
11570.688	51.89	PK	130	1.7	V	40.4	6.69	26.28	72.7	74	1.30*	Harmonic
9642.240	48.50	PK	120	1.3	H	41.1	5.98	26.42	69.16	74	4.84	Harmonic
7713.792	49.28	PK	161	1.6	H	39.0	5.27	26.64	66.91	74	7.09	Harmonic
5785.344	50.67	PK	120	1.0	H	37.4	4.57	26.68	65.96	74	8.04	Harmonic
9642.240	46.12	PK	140	1.7	V	39.9	5.98	26.42	65.58	74	8.42	Harmonic
7713.792	48.61	PK	140	1.5	V	37.7	5.27	26.64	64.94	74	9.06	Harmonic
3856.896	49.50	PK	275	2.1	H	33.9	3.73	26.87	60.26	74	13.74	Harmonic
5785.344	46.00	PK	162	1.6	V	36.2	4.57	26.68	60.09	74	13.91	Harmonic
3856.896	46.00	PK	185	1.5	V	33.0	3.73	26.87	55.86	74	18.14	Harmonic

*Within measurement uncertainty!

Field Strength of Spurious Emissions (Average)							
Freq. (MHz)	Peak Corrected Amplitude @ 3m (dBμV/m)	Ant. Polar (H/V)	Duty Cycle Factor (dB)	Corrected Ave Amplitude (dBμV/m)	FCC 15.319(g)		Comment
					Limit (dBμV/m)	Margin (dB)	
Low Channel							
11529.216	73.38	H	-27.83	45.55	54	8.45	Harmonic
11529.216	70.14	V	-27.83	42.31	54	11.69	Harmonic
5764.608	68.29	H	-27.83	40.46	54	13.54	Harmonic
9607.680	68.29	V	-27.83	40.46	54	13.54	Harmonic
9607.680	68.16	H	-27.83	40.33	54	13.67	Harmonic
5764.608	65.59	V	-27.83	37.76	54	16.24	Harmonic
7686.144	65.3	H	-27.83	37.47	54	16.53	Harmonic
7686.144	65	V	-27.83	37.17	54	16.83	Harmonic
3843.072	61.59	H	-27.83	33.76	54	20.24	Harmonic
3843.072	56.07	V	-27.83	28.24	54	25.76	Harmonic
Middle Channel							
11549.942	73.14	V	-27.83	45.31	54	8.69	Harmonic
11549.942	70.91	H	-27.83	43.08	54	10.92	Harmonic
9624.960	69.36	H	-27.83	41.53	54	12.47	Harmonic
9624.960	65.61	V	-27.83	37.78	54	16.22	Harmonic
7699.968	64.23	H	-27.83	36.4	54	17.60	Harmonic
5774.976	64.02	H	-27.83	36.19	54	17.81	Harmonic
7699.968	63.00	V	-27.83	35.17	54	18.83	Harmonic
5774.976	62.4	V	-27.83	34.57	54	19.43	Harmonic
3849.984	62.26	H	-27.83	34.43	54	19.57	Harmonic
3849.984	56.74	V	-27.83	28.91	54	25.09	Harmonic
High Channel							
11570.688	73.52	H	-27.83	45.69	54	8.31	Harmonic
11570.688	72.7	V	-27.83	44.87	54	9.13	Harmonic
9642.240	69.16	H	-27.83	41.33	54	12.67	Harmonic
7713.792	66.91	H	-27.83	39.08	54	14.92	Harmonic
5785.344	65.96	H	-27.83	38.13	54	15.87	Harmonic
9642.240	65.58	V	-27.83	37.75	54	16.25	Harmonic
7713.792	64.94	V	-27.83	37.11	54	16.89	Harmonic
3856.896	60.26	H	-27.83	32.43	54	21.57	Harmonic
5785.344	60.09	V	-27.83	32.26	54	21.74	Harmonic
3856.896	55.86	V	-27.83	28.03	54	25.97	Harmonic

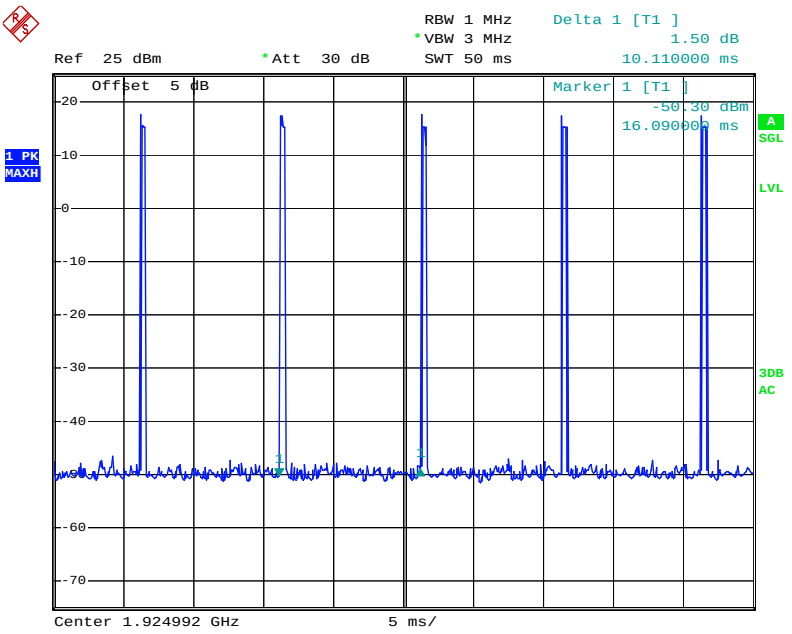
Note: Duty Cycle=T_{on}/T_p*100%
T_{on}=410μs =0.41ms, T_p=10.11ms
Duty Cycle=4.06%
Duty Cycle Factor = 20lg (Duty Cycle) = -27.83 dB
Average = Peak + Duty Cycle Factor

T_{on}:



Date: 9.MAR.2011 02:11:58

T_p:



Date: 9.MAR.2011 02:13:05

FCC §15.323 (f) - FREQUENCY STABILITY

Applicable Standard

Per §15.323(f), the frequency stability of the carrier frequency of the intentional radiator shall be maintained within ±10 ppm over 1 hour or the interval between channel access monitoring, whichever is shorter. The frequency stability shall be maintained over a temperature variation of −20° to +50 °C at normal supply voltage, and over a variation in the primary supply voltage of 85 percent to 115 percent of the rated supply voltage at a temperature of 20 °C. For equipment that is capable only of operating from a battery, the frequency stability tests shall be performed using a new battery without any further requirement to vary supply voltage

Test Procedure

This procedure should be carried out for each of the following test cases:

Temperature	Supply Voltage
20 °C	85-115% or new batteries
-20 °C	Normal
+50 °C	Normal

[a] Use the lowest temperature at which the EUT is specified to operate if it is above -20 °C.

Using the mean carrier frequency at 20°C and at nominal supply voltage as the reference, the mean carrier frequency shall be maintained within ±10 ppm at the two extreme temperatures (or as declared by the manufacturer) and at normal temperature (typically 20°C) at the two extreme supply voltages.
This test does not apply to an EUT that is capable only of operating from a battery.

Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
WUHUAN	Temperature & Humidity Chamber	HTP205	20021115	2010-06-04	2011-06-03
R & S	Digital Radio-Communication Tester	CMD60	829902/026	2010-10-21	2011-10-20

*** Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

Test Data

Environmental Conditions

Temperature:	20 ℃
Relative Humidity:	50 %
ATM Pressure:	100.0 kPa

The testing was performed by Jim Huang on 2011-03-25

Test Mode: Transmitting

Test Result: Compliance.

Temperature (^{O}C)	Voltage (V_{DC})	Channel Frequency (MHz)	Measured Frequency Offset (kHz)	Measured Frequency Offset (ppm)	Limit (ppm)
20	3.7	1924.992	4	2.08	± 10
0	3.7	1924.992	-6	-3.12	± 10
40	3.7	1924.992	3	1.56	± 10

FCC §15.323 & §15.319(f) – SPECIFIC REQUIREMENTS FOR UPCS DEVICE

Automatic Discontinuation of Transmission, FCC Part 15.319(f)

The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. The provisions in this section are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals.

Test Procedure:

Please according to the declaration provided by manufacturer.

Test result:

Meet the requirement

Monitoring Time FCC 15.323 (c) (1)

Immediately prior to initiating transmission, devices must monitor the combined time and spectrum window in which they intend to transmit. For a period of at least 10 milliseconds for systems designed to use a 10 milliseconds or shorter frame period or at least 20 milliseconds for systems designed to use a 20 milliseconds frame period

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.4

Test result:

EUT monitors the combined time and spectrum window prior to initiation of transmission. Test result please according to FCC15.323(c)(4).

Lower Monitoring Threshold Part15.323 (c) (2)

The monitoring threshold must not be more than 30 dB above the thermal noise power for a bandwidth equivalent to the emission bandwidth used by the device.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.1

Test result: Not Apply

Maximum Transmit Period FCC Part15.323 (c) (3)

If no signal above the threshold level is detected, transmission may commence and continue with the same emission bandwidth in the monitored time and spectrum windows without further monitoring. However, occupation of the same combined time and spectrum windows by a device or group of cooperating devices continuously over a period of time longer than 8 hours is not permitted without repeating the access criteria.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.2.2

Test result:

Repetition of Access Criteria	Measured Maximum Transmission Time (Second)	Limit (Second)	Results
First	16200	28,800	Pass
Second	16200	28,800	Pass

System Acknowledgement, FCC Part15.323 (c) (4)

Once access to specific combined time and spectrum windows is obtained an acknowledgment from a system participant must be received by the initiating transmitter within one second or transmission must cease. Periodic acknowledgments must be received at least every 30 seconds or transmission must cease. Channels used exclusively for control and signaling information may transmit continuously for 30 seconds without receiving an acknowledgment, at which time the access criteria must be repeated.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.1.1, 8.2.1

Test result:

Test	Time taken (second)	Limit (second)	Result
Connection acknowledgement	0.1	1	Pass
Change of access criteria for control information	N/A	30	Pass
Transmission cease time	1.2	30	Pass
Pulse length	0.00041	0.01	Pass

Note: N/A=Not Applicable

Least Interfered Channel (LIC) Selection, FCC Part15.323 (c) (5)

If access to spectrum is not available as determined by the above, and a minimum of 40 duplex system access channels are defined for the system, the time and spectrum windows with the lowest power level below a monitoring threshold of 50 dB above the thermal noise power determined for the emission bandwidth may be accessed.

Calculation of monitoring threshold limits for isochroous devices:
Lower threshold: $T_L = -174+10Log_{10}B + M_u + P_{MAX}-P_{EUT}$ (dBm)
Upper threshold: $T_U = -174+10Log_{10}B + M_u + P_{MAX}-P_{EUT}$ (dBm)
Where: B=Emission bandwidth (Hz)
M_u =dB the threshold may exceed thermal noise (30 for T_L & 50 for T_U)
P_{MAX} =$5Log_{10}B-10$(dBm)
P_{EUT} =Transmitted power (dBm)

Limit:

Monitor Threshold	B(MHz)	M_U(dB)	P_{MAX} (dBm)	P_{EUT} (dBm)	Threshold (dBm)
T_L	1.392	30	20.72	18.63	-80.47
T_U	1.392	50	20.72	18.63	-60.47

The EUT must not transmit until the interference level is less than or equal to:
Measured Threshold Level ≤ T_U
Where: T_U =Upper threshold level

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.2, 7.3.3, 7.3.4

Test result:

Monitor threshold	Measured Threshold Level	Limit (dBm)
Lower Threshold (dBm)	N/A	-80.47
Upper Threshold (dBm)	-64.4	-60.47

Note: The upper threshold is applicable as the EUT utilizes more than 40 duplex system channels

Random waiting FCC 15.323(c) (6)

If the selected combined time and spectrum windows are unavailable, the device may either monitor and select different windows or seek to use the same window after waiting an amount of time, randomly chosen from a uniform random distribution between 10 and 150 milliseconds, commencing when the channel becomes available.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.1.3

Test result:

The manufacturer declares that this provision is not utilized by the EUT.

Monitoring Bandwidth, FCC Part 15.323 (c) (7)

The monitoring system bandwidth must be equal to or greater than the emission bandwidth of the intended transmission and have a maximum reaction time less than 50xSQRT (1.25/emission bandwidth in MHz) microseconds for signals at the applicable threshold level but shall not be required to be less than 50 microseconds

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.5

Test result:

Test Equation (μs)	B (bandwidth) (MHz)	Pulse width (μs)	Limit (μs)	Result
50 $(1.25/B)^{1/2}$	1.392	47.38	50	Pass
35 $(1.25/B)^{1/2}$	1.392	33.17	35	Pass

Monitoring Antenna, FCC Part15.323 (c) (8)

The monitoring system shall use the same antenna used for transmission, or an antenna that yields equivalent reception at that location.

Test procedure:

Measurement method according to ANSI C63.17-2006 paragraph 4

Test result:

The antenna of the EUT used for transmission is the same interior antenna that used for monitoring.

Monitoring threshold relation FCC 15.323(c) (9)

Devices that have a power output lower than the maximum permitted under the rules can increase their monitoring detection threshold by one decibel for each one decibel that the transmitter power is below the maximum permitted.

Test procedure:

Measurement method according to ANSI C63.17-2006 paragraph 4

Test result:

Not apply based on 15.323 (c)(5)

Duplex Connections, FCC Part15.323 (c) (10)
An initiating device may attempt to establish a duplex connection by monitors both its intended transmit and receive time and spectrum windows. If both the intended transmit and receive time and spectrum windows meet the access criteria, then the initiating device can initiate a transmission in the intended transmit time and spectrum window. If the power detected by the responding device can be decoded as a duplex connection signal from the initiating device, then the responding device may immediately begin transmitting on the receive time and spectrum window monitored by the initiating device.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.3

Test result:

The manufacturer declares that this provision is not utilized by the EUT.

Alternative monitoring interval for co-located devices, FCC Part 15.323 (c) (11)

An initiating device that is prevented from monitoring during its intended transmit window due to monitoring system blocking from the transmissions of a co-located (within one meter) transmitter of the same system, may monitor the portions of the time and spectrum windows in which they intend to receive over a period of at least 10 milliseconds. The monitored time and spectrum window must total at least 50 percent of the 10 millisecond frame interval and the monitored spectrum must be within 1.25 MHz of the center frequency of channel(s) already occupied by that device or co-located co-operating devices. If the access criteria is met for the intended receive time and spectrum window under the above conditions, then transmission in the intended transmit window by the initiating device may commence.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.4

Test result:

The manufacturer declares that this provision is not utilized by the EUT.

Fair Access, FCC Part 15.323 (c) (12)

The provisions of FCC Part15.323(c)(10) or (c)(11) shall not be used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.

Test result:

The manufacturer declares that this device does not use any mechanisms as provided by Part15.323 (c) (10) or (c) (11) to extend the range of spectrum occupied over space or time for the purpose of denying fail access to spectrum to other device.

Frame Repetition Stability, Part15 .323 (e)

The frame period (a set of consecutive time slots in which the position of each time slot can be identified by reference to a synchronizing source) of an intentional radiator operating in these sub-bands shall be 20 milliseconds or 10 milliseconds/X where X is a positive whole number.

Test procedure:

Measurement method according to ANSI C63.17-2006 clause 6.2.2, 6.2.3

Test result:

Frame Repetition Stability:

Frame Repetition Stability (ppm)	Limit (ppm)	Result (Pass/Fail)
0.45	10	Pass

Frame Period and Jitter:

Max. pos. Jitter (us)	Max. neg. Jitter (us)	Frame period (ms)	Limit	
			Frame Period (ms)	Jitter (µs)
0.12	-0.11	10.00000	20 or 10/X	25us

Note: X is a positive whole number.

PRODUCT SIMILAR DECALARATION

PORTA PHONE

Product Similarity Declaration

To Whom It May Concern,

We, PORTA PHONE CO., INC., hereby declare that our FULL DUPLEX WIRELESS HEADSET SYSTEM, for earphone part, we would like to list four models on reports that are ComStar S, ComStar Sx, ComStar D and ComStar Dx, among these models BACL choose ComStar S for test.

The model names Comstar SX, Comstar D, and Comstar Dx were created after the recently certified Comstar S headset simply to distinguish slight differences in the plastic parts (see table below), and strictly for marketing purposes:

Differences / Model Name	Speaker	Color of Key Button
ComStar S	Single speaker	MIC key: Grey color
ComStar Sx	Single speaker	CH key: RED color
ComStar D	Dual speaker	MIC key: Grey color
ComStar Dx	Dual speaker	CH key: RED color

Since the RF design is the exact same in every aspect the four differently labeled headsets represent the exact same product.

Please contact me if you have any question.

Sincerely,

John Hooper Jr.
Vice President

3-31-11

145 Dean Knauss Dr
P.O. Box 560
Narragansett, RI 02882
Tel: 1-800-233-1113
In RI: 1-401-789-6700
Fax: 1-401-789-7300

******* END OF REPORT *******