TEST REPORT FOR FCC PART 15 COMPLIANCE FOR PHONIC EAR INC.

Prepared by Daniel C. Swann August 9, 1999

Phonic Ear Inc. Part Number PE 560T

FCC Part 15.237 Intentional Radiator

FCC ID BRG560T

GEL Report File PE9901

GLEN ELLEN LABORATORIES

1876 London Ranch Road Glen Ellen, CA 95442

MEASUREMENT/TECHNICAL REPORT

PHONIC EAR

FCC ID BRG560T

This report concerns:	An Original Grant
Equipment type:	Part 15.237 Intentional Radiator
Deferred grant requested:	no
Transition rules per 15.37:	no
Report prepared by:	Daniel C. Swann Glen Ellen Laboratories 1876 London Ranch Road Glen Ellen, CA 95442 (707) 996-8533 (707) 996-2803 fax
Report Certified By:	Daniel C. Swann
	Date
GEL Report File:	PE9901

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1 GENERAL INFORMATION

1.1 Product Description

The Phonic Ear Part Number PE 560T is a frequency modulated transmitter which utilizes the FCC Part 15.237 frequency bands for auditory assistance devices.

The transmitter uses either a short flexible plastic covered broadband antenna, or a 6 foot Large Area tuned antenna (two differently tuned antennas are required to cover the frequency range). The short antenna was tested attached to the rear RF connector of the unit, and also tested connected with a coax cable to a small groundplane placed remotely from the transmitter.

The coaxial antenna connections are made to the transmitter unit and to the antennas with a unique coupling, insuring that no other antenna than that furnished by Phonic Ear inc. will be used. Specifically, the connector used is a left hand thread TNC coaxial connector, denoted LH-TNC.

The transmitter uses a standard audio input from a microphone, as used for the testing detailed in this report, or another audio source.

See the User Instructions for a description of the available controls on the EUT.

The product is powered by a wall-mount transformer.

The internal construction is a single multi layer PC board, a front panel keyboard PC board, and a display module.

The product is housed in a metal box.

1.2 Related Submittal or Grant

There are no related submittals or grants.

1.3 Tested System Details

EUT

Phonic Ear Part Number PE 560T transmitter, PC Board Fab 900-7285-401.

Power Supply Calrad Model 45-764, 120VAC input, 16 VAC output at 1.1 amp, with 1.9 meter unshielded cable.

With the following accessories:

Note: LH-TNC is a abbreviation for "Left Hand Thread TNC coaxial connector"

Accessory	PE Part Numbe	umber Description					
Short Antenna	AT0777	Broadband antenna with LH-TNC connector					
Groundplane	AT0775	Antenna Groundplane, LH-TNC with connector kit					
Groundplane	AT0776	Antenna Groundplane, LH-TNC, with LH-TNC 50 foot cable					
Large Area Antenna, Low Band	AT0773	Large Area Antenna, LH-TNC, Low Band, with connector kit					
Large Area Antenna, High Band	AT0774	Large Area Antenna, High Band, LH-TNC with connector kit					
Connector kit	AT0778	LH-TNC cable connector kit					
Coax Cable	AT0779	LH-TNC cable, 50 feet long					

Made by:

Phonic Ear Inc. 3880 Cypress Drive Petaluma, CA 94954-7600

The circuit uses various oscillators. See the Block Diagram for more information.

1.4 Test Methodology

The emissions tests were performed in accordance with the ANSI C63.4-1992 standard.

1.5 Test Facility

The Glen Ellen Laboratories open area test site and conducted measurement facility is located in Glen Ellen, California, at the street address of 1876 London Ranch Road. This site has been fully described in a report dated September 16, 1996, submitted to the FCC, and accepted in a letter dated December 4, 1996 (31040/SIT/1300F2.)

Test equipment used included:

- 1. Hewlett Packard 8560A opt 002 spectrum analyzer, cal due 6-20-00.
- 2. Sonoma Instruments 317 preamplifier, 10 kHz to 2.5 GHz, cal due 3-5-00.
- 3. GEL BIC9414 biconical antenna, 30 MHz to 300 MHz, cal due 6-22-00.
- 4. GEL LPA-3 log periodic antenna, 275 MHz to 2 GHz, cal due 6-22-00.
- 5. Two Solar LISN's model number 8028-50-TS-24-BNC, cal due 5-09-00.
- 6. EMCO LISN, model number 3825/2, cal due 5-09-00.

2 PRODUCT MANUAL STATEMENT

2.1 FCC Statement in User Manual

The following statement appears in a prominent location in the text of the user manual:

NOTE: This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) this device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

Any changes or modifications made to any government approved element of this FM system, without the expressed approval of Phonic Ear Inc., in writing, could void the user's authority to operate those elements of the system.

If any antenna or cordage, other than those specifically approved for use with this FM system by Phonic Ear Inc. is used, the antenna or cord must be installed by a professional and the operation of the system must be verified by the installer of the antenna or cord to comply with applicable government regulations.

IMPORTANT: This product was tested for FCC compliance under conditions that included the use of shielded cables and connectors between System components.

3 SYSTEM TEST CONFIGURATION

3.1 Justification

The EUT was tested in accordance with the standard ANSI C63.4-1992, and 47 CFR Part 15. Measurements were made at 10 meter measurement distance. Part 15.237 Intentional Radiator test limits were scaled from 3 meter test distance to 10 meter test distance using the scale factor 20*LOG(3/10), or –10.5 dB. The field strength limit in the specified 200 kHz transmitter bandwidth is 80 millivolts/meter at 3 meters, or 98.1 dBuV/meter at 3 meters, or 87.6 dBuV/meter at 10 meters. The out of band emissions limit is 1500 microvolts/meter at 3 meters, or 63.5 dBuV/meter at 3 meters, or 53.0 dBuV/meter at 10 meters. To prevent preamplifier overload, a notch filter at the transmit frequency was used to allow measurement of out of band measurements, and an attenuation of 20 dB was used for measuring power in band. Measurements were made using an average detector. Peak levels were less than 3 dB above average levels, compliant with FCC Part 15.35

Measurements were made in each of the three Part 15.237 frequency bands, Channel A in the 72.0 MHz to 73.0 MHz band, Channel I in the 74.6 MHz to 74.8 MHz band, and Channel H in the 75.2 MHz to 76.0 MHz band.

3.2 EUT Exercise Equipment and Software

The transmitter was tested without modulation for the radiated emissions test, and tested with modulation for the occupied bandwidth test. See the plots in Appendix 6.1 for details of the occupied bandwidth tests.

3.3 Special Accessories

No special accessories were used.

3.4 Equipment Modifications

No equipment modifications were made.

3.5 Configuration of Tested System

The system was configured with the transmitter and the microphone placed 10 cm apart on the radiated test tabletop. The antenna was attached to the RF connector on the back of the unit. For the groundplane measurements, the antenna was connected to the Antenna Groundplane with a 10 foot coax cable.

For tests with the Large Area Antennas, the antenna was placed in a tripod stand next to the turntable. Power output of the transmitter was adjusted to compensate for the greater gain of the long antenna. See note below.

This condition put the EUT in the highest emissions state.

For the occupied bandwidth test the auxiliary microphone input connector was connected to an audio function generator through a 50 meter RG-58 cable. Modulation was set at the maximum.

See the photographs for the configuration of the tested system.

Note:

The conducted power was measured on a spectrum analyzer with a 50 ohm termination and recorded for both antenna configurations. These measurements will be used to set the output power on the units when tested in manufacturing.

4 CONDUCTED EMISSIONS DATA

Conducted measurements were made using 10 kHz RBW, in quasi-peak detection mode. These measurements were made on July 23, 1999, August 4, 1999, and August 5,1999, by Daniel Swann, Roger Davis and Lee Henderson. See the photographs for the configuration of the test setup.

Channel A	72.1000	Corrected		
Frequency	Measured	Measured	FCC B	FCC B
MHz	Amplitude	Amplitude	Limit	Margin
	dBuV	dBuV	dBuV	dB
Line				
0.450	26.2	36.9	48.0	-11.1
12.288	15.6	29.1	48.0	-18.9
15.360	15.4	29.4	48.0	-18.6
18.432	14.6	28.9	48.0	-19.1
21.504	16.8	31.5	48.0	-16.5
24.576	24.5	39.4	48.0	-8.6
27.649	16.7	32.0	48.0	-16.0
Neutral				
0.458	30.9	41.6	48.0	-6.4
12.289	15.8	29.3	48.0	-18.8
15.359	16.0	30.0	48.0	-18.0
18.432	14.8	29.1	48.0	-18.9
21.504	16.5	31.1	48.0	-16.9
24.576	23.1	38.1	48.0	-9.9
27.649	14.1	29.4	48.0	-18.6

Test Personnel:

Channel H	75.9000	Corrected		
Frequency	Measured	Measured	FCC B	FCC B
MHz	Amplitude	Amplitude	Limit	Margin
	dBuV	dBuV	dBuV	dB
Line				
0.451	27.3	37.9	48.0	-10.1
12.289	17.9	31.4	48.0	-16.6
15.361	17.1	31.0	48.0	-17.0
21.504	19.1	33.8	48.0	-14.2
24.577	23.8	38.8	48.0	-9.2
27.649	18.6	33.9	48.0	-14.1
Neutral				
0.500	28.5	39.2	48.0	-8.8
9.217	16.5	29.5	48.0	-18.5
12.289	15.4	28.9	48.0	-19.1
15.361	16.3	30.2	48.0	-17.8
18.433	14.6	28.8	48.0	-19.2
21.505	16.9	31.6	48.0	-16.4
24.577	22.0	37.0	48.0	-11.0
27.649	14.4	29.8	48.0	-18.2
Channel I	74.7000			
Line				
0.500	27.7	38.4	48.0	-9.6
9.214	19.0	32.0	48.0	-16.0
12.286	19.3	32.8	48.0	-15.2
15.358	17.9	31.8	48.0	-16.2
18.430	18.3	32.6	48.0	-15.4
21.502	18.8	33.5	48.0	-14.5
24.576	23.4	38.4	48.0	-9.6
27.648	18.5	33.8	48.0	-14.2
Neutral				
0.500	27.9	38.6	48.0	-9.4
12.288	16.1	29.6	48.0	-18.4
15.360	16.9	30.8	48.0	-17.2
18.432	16.1	30.4	48.0	-17.6
21.504	17.3	32.0	48.0	-16.0
24.576	23.9	38.9	48.0	-9.1
27.648	17.9	33.2	48.0	-14.8
Test Personnel:				

5 RADIATED EMISSIONS DATA

5.1 Data

The following data lists the significant emissions frequencies, measured levels and FCC Part 15.237 limits for measurements made on July 23, 1999, August 4, 1999 and August 5,1999 by Daniel Swann, Roger Davis and Lee Henderson. Measurements are average readings, with an IF bandwidth of 10 KHz for in band measurements, and 100 KHz for out of band measurements. A video filter was not used. Peak levels were less than 3 dB above average levels, compliant with FCC Part 15.35. The plots of Occupied Bandwidth for the three bands are presented in Appendix 6.1. See Section 3.1, Justification, for the calculation of the emission limits at 10 meter measurement distance.

In Band Measurements

Broadband A	intenna						
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 r	neter limit
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Channel A							
Vertical Pola	rization						
72.110	96.6	6.5	2.3	18.6	86.9	87.6	-0.7
Horizontal Po	olarization						
72.113	71.1	6.5	2.3	18.6	61.5	87.6	-26.1
Channel I							
Vertical Pola	rization						
74.710	94.2	6.6	2.4	18.6	84.6	87.6	-3.0
Horizontal Po	olarization						
74.716	82.1	6.6	2.4	18.6	72.4	87.6	-15.2
Channel H							
Vertical Pola	rization						
75.912	93.2	6.5	2.4	18.6	83.5	87.6	-4.1
Horizontal Po	olarization						
75.910	81.8	6.5	2.4	18.6	72.1	87.6	-15.5

Test Personnel:

Data (continued) (in band measurements continued) **5.1**

Measurements with groundplane

Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 me	eter limit
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	DBuV/m	dBuV/m	Margin
01 1. 4							
Channel A							
Vertical Polar				400		a= a	. –
72.110		6.5	2.3	18.6	86.9	87.6	-0.7
Horizontal Po	olarization						
72.113	71.1	6.5	2.3	18.6	61.5	87.6	-26.1
Channel I							
Vertical Polar	rization						
74.713	95.7	6.6	2.4	18.6	86.1	87.6	-1.5
Horizontal Po	olarization						
74.708	68.6	6.6	2.4	18.6	58.9	87.6	-28.7
Channel H							
Vertical Polar	rization						
75.911	95.0	6.5	2.4	18.6	85.4	87.6	-2.2 channnel H
Horizontal Po	olarization						
75.911	85.0	6.5	2.4	18.6	75.4	87.6	-12.2 channnel H

Test Personnel:

Measurements with Large Area Antenna

Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 r	neter limit
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Channel A							
Vertical Pola	rization						
72.108	95.5	6.5	2.3	18.6	85.8	87.6	-1.8
Horizontal Po	olarization						
72.108	72.5	6.5	2.3	18.6	62.8	87.6	-24.8
Channel I							
Vertical Pola	rization						
74.713	96.5	6.6	2.4	18.6	86.8	87.6	-0.8
Horizontal Po	olarization						
74.719	74.0	6.6	2.4	18.6	64.3	87.6	-23.3
Channel H							
Vertical Pola	rization						
75.900	96.3	6.5	2.4	18.6	86.7	87.6	-0.9
Horizontal Po	olarization						
75.899	71.7	6.5	2.4	18.6	62.0	87.6	-25.6

Test Personnel:

Tester Name: Daniel C. Swann

David C. Swam

5.1 Data (continued)

Out of Band Measurements

Channel A, b Frequency	Channel A, broadband antenna Frequency Measured Antenna Cable Amplifier Field Part 15.237 10 meter limit								
MHz	Measured	Antenna	Cable	Amplifier Gain					
IVIITZ	Amplitude dBuV	Factor dB/m	Loss dB	dB	Strength dBuV/m	Average dBuV/m	Average		
	ивиу	UD/III	uБ	uБ	ubu v/III	ubu v/III	Margin		
Vertical Polar	rization								
36.860	43.0	15.7	1.7	38.5	21.9	53.0	-31.1		
40.000	47.3	14.4	1.8	38.5	24.9	53.0	-28.1		
55.290	50.4	9.2	2.1	38.5	23.2	53.0	-29.8		
62.100	40.1	7.8	2.2	38.5	11.6	53.0	-41.4		
73.720	30.7	6.6	2.4	38.6	1.1	53.0	-51.9		
110.580	44.6	11.4	2.9	38.6	20.4	53.0	-32.6		
120.000	50.0	12.9	3.0	38.5	27.4	53.0	-25.6		
124.200	39.0	13.2	3.1	38.5	16.7	53.0	-36.3		
129.010	41.7	13.7	3.1	38.5	19.9	53.0	-33.1		
144.220	45.8	14.5	3.3	38.5	25.1	53.0	-27.9		
160.000	65.4	15.2	3.5	38.5	45.6	53.0	-7.4		
184.300	41.2	16.5	3.7	38.6	22.9	53.0	-30.1		
186.300		16.5	3.7	38.6	16.4	53.0	-36.6		
200.000		17.0	3.9	38.6	35.3	53.0	-17.7		
216.330	39.1	17.3	4.0	38.6	21.8	53.0	-31.2		
239.620	36.2	17.0	4.3	38.7	18.8	53.0	-34.2		
240.000		17.0	4.3	38.7	37.7		-15.3		
248.400	31.4	17.2	4.4	38.7	14.3	53.0	-38.7		
288.440	36.9	18.4	4.7	38.6	21.5	53.0	-31.5		
320.000	43.0	15.1	5.0	38.5	24.6	53.0	-28.4		
400.000	44.5	17.0	5.6	38.6	28.5		-24.5		
480.000	47.0	18.4	6.2	38.5	33.1	53.0	-19.9		
560.000	46.1	19.7	6.7	38.6	33.9	53.0	-19.1		

Test Personnel:

5.1 Data (continued)

Out of Band Measurements

Channel A, broadband antenna

Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Harizantal Da	olorization						
Horizontal Po		4 4 4	4.0	20.5	0.0	50.0	10.4
40.000		14.4	1.8	38.5	9.6		-43.4
40.000		14.4	1.8	38.5	9.6		-43.4
120.000		12.9	3.0	38.5	23.1	53.0	-29.9
120.000		12.9	3.0	38.5	23.1	53.0	-29.9
124.200	36.3	13.2	3.1	38.5	14.0	53.0	-39.0
124.200	36.3	13.2	3.1	38.5	14.0	53.0	-39.0
144.223	42.1	14.5	3.3	38.5	21.4	53.0	-31.6
144.223	42.1	14.5	3.3	38.5	21.4	53.0	-31.6
160.000	61.4	15.2	3.5	38.5	41.6	53.0	-11.4
160.000	61.4	15.2	3.5	38.5	41.6	53.0	-11.4
184.300		16.5	3.7	38.6	23.4		-29.6
184.300	41.8	16.5	3.7	38.6	23.4	53.0	-29.6
200.000		17.0	3.9	38.6	33.9		-19.1
200.000		17.0	3.9	38.6	33.9		-19.1
216.333	35.4	17.3	4.0	38.6	18.2	53.0	-34.8
216.333		17.3	4.0	38.6	18.2		-34.8
240.000		17.0	4.3	38.7	32.2		-20.8
240.000		17.0	4.3	38.7	32.2		-20.8
320.000		15.1	5.0	38.5	29.8		-23.2
400.000		17.0	5.6	38.6	31.0		-22.0
480.000		18.4	6.2	38.5	35.5		-17.5
560.000	52.9	19.7	6.7	38.6	40.6	53.0	-12.4

Test Personnel:

Channel I, br	roadband an	tenna					
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	neter limit
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Vertical Pola	rization						
36.860	41.4	15.7	1.7	38.5	20.4	53.0	-32.6
40.000	48.4	14.4	1.8	38.5	26.1	53.0	-26.9
55.277	49.7	9.2	2.1	38.5	22.4	53.0	-30.6
110.580	42.8	11.4	2.9	38.6	18.5	53.0	-34.5
120.000	51.7	12.9	3.0	38.5	29.1	53.0	-23.9
147.419	42.1	14.6	3.3	38.5	21.4	53.0	-31.6
149.420	42.3	14.8	3.3	38.5	21.9	53.0	-31.1
160.000	62.5	15.2	3.5	38.5	42.7	53.0	-10.3
184.279	38.2	16.5	3.7	38.6	19.9	53.0	-33.1
200.000	50.1	17.0	3.9	38.6	32.3	53.0	-20.7
224.120	42.3	17.2	4.1	38.6	25.0	53.0	-28.0
239.569	35.4	17.0	4.3	38.7	18.0	53.0	-35.0
240.000	56.3	17.0	4.3	38.7	38.9	53.0	-14.1
298.830	33.3	19.1	4.8	38.6	18.6	53.0	-34.4
320.000	45.1	15.1	5.0	38.5	26.6	53.0	-26.4
400.000	46.0	17.0	5.6	38.6	30.0	53.0	-23.0
560.000	47.7	19.7	6.7	38.6	35.4	53.0	-17.6
Horizontal Po	olarization						
120.000		12.9	3.0	38.5	26.4	53.0	-26.6
149.395		14.8	3.3	38.5	21.8		-31.2
160.000		15.2	3.5	38.5	38.2		-14.8
160.000		15.2	3.5	38.5	37.8		-15.2
184.300		16.5	3.7	38.6	22.0		-31.0
200.000		17.0	3.9	38.6	34.1		-18.9
240.000		17.0	4.3	38.7	35.3		-17.7
298.825		19.1	4.8	38.6	20.0		-33.0
320.000		15.1	5.0	38.5	29.6		-23.4
400.000		17.0	5.6	38.6	38.6		38.6
440.000		17.0	5.9	38.5	37.3		-15.7
480.000		18.4	6.2	38.5	37.4		-15.6

Test Personnel:

Tester Name:

Daniel C. Swann

David C. Swam

Channel H, b	roadband a	ntenna					
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	eter limit
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Vertical Polar	rization						
36.860	41.7	15.7	1.7	38.5	20.7		-32.3
40.000		14.4	1.8	38.5	26.5		-26.5
55.292		9.2	2.1	38.5	22.5		-30.5
62.100		7.8	2.2	38.5	9.9		-43.1
110.582	46.3	11.4	2.9	38.6	22.1	53.0	-30.9
120.000		12.9	3.0	38.5	30.9		-22.1
124.200		13.2	3.1	38.5	10.9		-42.1
151.801	41.5	15.0	3.3	38.5	21.3		-31.7
160.000	62.3	15.2	3.5	38.5	42.4	53.0	-10.6
184.302	40.5	16.5	3.7	38.6	22.2		-30.8
200.000	49.9	17.0	3.9	38.6	32.2	53.0	-20.8
227.713	36.6	17.0	4.1	38.6	19.1	53.0	-33.9
239.590		17.0	4.3	38.7	18.7		-34.3
240.000		17.0	4.3	38.7	38.8		-14.2
320.000	43.8	15.1	5.0	38.5	25.4	53.0	-27.6
400.000	45.7	17.0	5.6	38.6	29.7	53.0	-23.3
480.000	48.1	18.4	6.2	38.5	34.2	53.0	-18.8
560.000		19.7	6.7	38.6	36.0	53.0	-17.0
Horizontal Po	olarization						
120.000	46.7	12.9	3.0	38.5	24.1	53.0	-28.9
151.800	38.9	15.0	3.3	38.5	18.7	53.0	-34.3
160.000	58.2	15.2	3.5	38.5	38.4	53.0	-14.6
184.300		16.5	3.7	38.6	23.6		-29.4
200.000		17.0	3.9	38.6	34.0		-19.0
227.700	36.9	17.0	4.1	38.6	19.4	53.0	-33.6
240.000	52.6	17.0	4.3	38.7	35.2	53.0	-17.8
280.000	49.1	18.3	4.7	38.6	33.5	53.0	-19.5
320.000	50.2	15.1	5.0	38.5	31.7	53.0	-21.3
400.000	47.9	17.0	5.6	38.6	31.9	53.0	-21.1
480.000	50.6	18.4	6.2	38.5	36.8	53.0	-16.2
560.000	53.2	19.7	6.7	38.6	40.9	53.0	-12.1

Test Personnel:

Channel A, g							
configuration		A . (0-11-	A 1'C'	- 1.1.1	D- + 45 007 40 ···	. (1' '(
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
Markad Bala	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Vertical Polar		444	4.0	00.5	00.4	50.0	00.0
40.000		14.4	1.8	38.5	22.1	53.0	-30.9
62.100		7.8	2.2	38.5	18.7		-34.3
120.000		12.9	3.0	38.5	25.9		-27.1
144.220		14.5	3.3	38.5	27.7		-25.3
160.000		15.2	3.5	38.5	41.7		-11.3
184.300		16.5	3.7	38.6	20.2		-32.8
200.000		17.0	3.9	38.6	38.4		-14.6
240.000		17.0	4.3	38.7	31.6		-21.4
280.000		18.3	4.7	38.6	23.6		-29.4
320.000		15.1	5.0	38.5	23.0		-30.0
360.000		16.3	5.3	38.6	29.2		-23.8
400.000		17.0	5.6	38.6	30.2		-22.8
440.000		17.4	5.9	38.5	29.1	53.0	-23.9
480.000		18.4	6.2	38.5	28.2	53.0	-24.8
520.000	51.8	18.6	6.4	38.5	38.3	53.0	-14.7
560.000	45.4	19.7	6.7	38.6	33.2	53.0	-19.8
600.000	44.3	19.8	6.9	38.4	32.5	53.0	-20.5
720.000	37.6	21.5	7.5	38.6	28.0	53.0	-25.0
Horizontal Po	olarization						
120.000		12.9	3.0	38.5	29.6	53.0	-23.4
144.200		14.5	3.3	38.5	24.7		-28.3
160.000		15.2	3.5	38.5	36.9		-16.1
200.000		17.0	3.9	38.6	27.6		-25.4
240.000		17.0	4.3	38.7	33.5		-19.5
280.000		18.3	4.7	38.6	19.5		-33.5
320.000		15.1	5.0	38.5	21.0		-32.0
360.000		16.3	5.3	38.6	27.1	53.0	-25.9
400.000		17.0	5.6	38.6	28.8		-24.2
440.000		17.4	5.9	38.5	24.4		-28.6
480.000		18.4	6.2	38.5	22.1	53.0	-30.9
560.000		19.7	6.7	38.6	24.0		-29.0
000.000	00.2	13.7	0.7	00.0	2-7.0	55.0	20.0

Test Personnel:

Channel I, groundplane configuration

configuration							
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 meter limit	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin
Vertical Polar							
36.860		15.7	1.7	38.5	17.1		-35.9
40.000	49.6	14.4	1.8	38.5	27.3		-25.7
73.720		6.6	2.4	38.6	4.8		-48.2
80.000		6.8	2.4	38.6	5.7		-47.3
92.150		8.6	2.6	38.6	19.5		-33.5
110.580		11.4	2.9	38.6	13.9		-39.1
120.000		12.9	3.0	38.5	31.6		-21.4
129.010		13.7	3.1	38.5	11.8		-41.2
147.440		14.6	3.3	38.5	16.4		-36.6
149.426		14.8	3.3	38.5	25.1		-27.9
160.000		15.2	3.5	38.5	38.8		-14.2
165.870		15.7	3.5	38.5	19.4		-33.6
184.300	41.1	16.5	3.7	38.6	22.8		-30.2
200.000		17.0	3.9	38.6	34.7		-18.3
202.730		17.1	3.9	38.6	17.9		-35.1
221.160	34.1	17.0	4.1	38.6	16.5		-36.5
224.139	42.8	17.2	4.1	38.6	25.4		-27.6
239.590		17.0	4.3	38.7	16.1		-36.9
240.000	54.1	17.0	4.3	38.7	36.8	53.0	-16.2
258.020	32.3	17.5	4.5	38.7	15.6		-37.4
280.000	39.0	18.3	4.7	38.6	23.4		-29.6
298.852	32.1	19.1	4.8	38.6	17.4	53.0	-35.6
320.000	40.8	15.1	5.0	38.5	22.4		-30.6
320.000		15.1	5.0	38.5	23.0		-30.0
360.000		16.3	5.3	38.6	29.3		-23.7
360.000	46.4	16.3	5.3	38.6	29.4		-23.6
400.000		17.0	5.6	38.6	31.6		-21.4
440.000		17.4	5.9	38.5	30.7		-22.3
480.000		18.4	6.2	38.5	28.6		-24.4
560.000	45.4	19.7	6.7	38.6	33.1	53.0	-19.9
600.000	44.5	19.8	6.9	38.4	32.7	53.0	-20.3
680.000		21.5	7.3	38.6	29.9		-23.1
720.000	38.9	21.5	7.5	38.6	29.3	53.0	-23.7
760.000	34.3	21.8	7.7	38.4	25.4	53.0	-27.6

Test Personnel:

Tester Name:

Daniel C. Swann

Channel I, groundplane

124,200

129.010

147.440

149.392

160.000

184.300

186.300

200.000

224.100

240.000

248.400

280.000

298.808

320.000

360.000

400.000

440.000

480.000

560.000

600,000

760.000

36.5

37.3

38.8

40.8

53.4

33.3

34.7

43.5

34.1

52.4

33.5

33.9

32.6

39.2

43.2

45.2

40.2

36.5

35.9

38.0

35.0

-38.8

-37.5

-34.8

-32.7

-19.4

-38.0

-36.7

-27.3

-36.3

-17.9

-36.7

-34.7

-35.1

-32.2

-26.8

-23.8

-28.0 -30.4

-29.4

-26.8

-27.0

5.1 Data (continued) (out of band measurements continued)

13.2

13.7

14.6

14.8

15.2

16.5

16.5

17.0

17.2

17.0

17.2

18.3

19.1

15.1

16.3

17.0

17.4

18.4

19.7

19.8

21.8

3.1

3.1

3.3

3.3

3.5

3.7

3.7

3.9

4.1

4.3

4.4

4.7

4.8

5.0

5.3

5.6

5.9

6.2

6.7

6.9

7.7

configuration Frequency Measured Antenna Cable **Amplifier** Field Part 15.237 10 meter limit MHz **Amplitude** Gain Strength Factor Loss Average Average dBuV dΒ dΒ dBuV/m dBuV/m dB/m Margin Horizontal Polarization 40.000 36.4 14.4 1.8 38.5 14.1 53.0 -38.9 62.100 35.3 7.8 2.2 38.5 6.8 53.0 -46.2 -49.580.000 32.8 6.8 2.4 38.6 3.5 53.0 110.580 35.6 11.4 2.9 38.6 11.4 53.0 -41.6 120.000 54.8 12.9 3.0 38.5 32.1 53.0 -20.9

38.5

38.5

38.5

38.5

38.5

38.6

38.6

38.6

38.6

38.7

38.7

38.6

38.6

38.5

38.6

38.6

38.5

38.5

38.6

38.4

38.4

14.2

15.5

18.2

20.3

33.6

15.0

16.3

25.7

16.7

35.1

16.3

18.3

17.9

20.8

26.2

29.2

25.0

22.6

23.6

26.2

26.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

53.0

Test Personnel:

Channel H, groundplane configuration Frequency Measured Antenna Field Part 15.237 10 meter limit Cable Amplifier MHz **Amplitude** Factor Loss Gain Strength Average Average dBuV dB/m dB dΒ dBuV/m dBuV/m Margin Vertical Polarization 36.860 36.1 15.7 1.7 38.5 15.1 53.0 -37.9 36.860 35.3 15.7 1.7 38.5 14.3 53.0 -38.7 40.000 44.9 14.4 1.8 38.5 22.5 53.0 -30.59.2 55.290 60.5 2.1 38.5 33.2 53.0 -19.848.2 7.8 19.7 62.100 2.2 38.5 53.0 -33.373.720 33.7 6.6 2.4 38.6 4.0 53.0 -49.0 34.6 80.000 6.8 2.4 38.6 5.3 53.0 -47.7 110.580 39.1 11.4 2.9 38.6 14.9 53.0 -38.1 120.000 54.8 12.9 3.0 38.5 32.2 53.0 -20.8 147.440 31.3 14.6 3.3 38.5 10.7 53.0 -42.3151.820 41.8 15.0 3.3 38.5 21.6 53.0 -31.4 -14.0 160.000 58.8 15.2 38.5 39.0 53.0 3.5 184.300 38.2 16.5 3.7 38.6 19.9 53.0 -33.1 41.1 16.5 186.300 3.7 38.6 22.8 53.0 -30.2200,000 53.0 17.0 3.9 38.6 35.3 53.0 -17.7221.160 33.8 17.0 4.1 38.6 16.2 53.0 -36.8 227.730 38.5 17.0 4.1 38.6 21.0 53.0 -32.054.1 17.0 -16.2 240.000 4.3 38.7 36.8 53.0 258.020 31.7 17.5 4.5 38.7 15.0 53.0 -38.0 280.000 40.3 18.3 38.6 24.7 53.0 -28.3 4.7 320,000 41.4 15.1 5.0 38.5 22.9 53.0 -30.1 46.4 16.3 38.6 29.4 -23.6 360.000 5.3 53.0 47.2 400.000 17.0 5.6 38.6 31.2 -21.8 53.0 440.000 44.0 17.4 5.9 38.5 28.8 53.0 -24.2480.000 42.4 38.5 -24.518.4 6.2 28.5 53.0 520.000 51.1 18.6 6.4 38.5 37.7 53.0 -15.344.8 19.7 38.6 -20.4560.000 6.7 32.6 53.0 44.4 19.8 38.4 32.6 600.000 6.9 53.0 -20.4720.000 39.6 21.5 7.5 38.6 30.0 53.0 -23.0

Test Personnel:

Tester Name:

Daniel C. Swann

miel C. Curam

Channel H, groundplane configuration									
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 n	neter limit		
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average		
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin		
Horizontal Po									
120.000	54.7	12.9	3.0	38.5	32.0	53.0	-21.0		
129.010	38.4	13.7	3.1	38.5	16.6	53.0	-36.4		
151.800	38.8	15.0	3.3	38.5	18.5	53.0	-34.5		
160.000	53.6	15.2	3.5	38.5	33.7	53.0	-19.3		
184.300	33.1	16.5	3.7	38.6	14.8	53.0	-38.2		
200.000	44.1	17.0	3.9	38.6	26.4	53.0	-26.6		
227.700	29.5	17.0	4.1	38.6	11.9	53.0	-41.1		
240.000	51.5	17.0	4.3	38.7	34.1	53.0	-18.9		
280.000	33.3	18.3	4.7	38.6	17.7	53.0	-35.3		
320.000	40.5	15.1	5.0	38.5	22.1	53.0	-30.9		
360.000	43.7	16.3	5.3	38.6	26.7	53.0	-26.3		
400.000	45.4	17.0	5.6	38.6	29.4	53.0	-23.6		
440.000	41.2	17.4	5.9	38.5	26.0	53.0	-27.0		
480.000	34.8	18.4	6.2	38.5	20.9	53.0	-32.1		
560.000	36.4	19.7	6.7	38.6	24.2	53.0	-28.8		
600.000	39.3	19.8	6.9	38.4	27.5	53.0	-25.5		

Test Personnel:

Tester Name:

Daniel C. Swann

Channel A, Large Area Antenna									
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	eter limit		
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average		
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin		
Vertical Pola	rization								
40.012	52.4	14.4	1.8	38.5	30.1	53.0	-22.9		
62.100	48.7	7.8	2.2	38.5	20.2	53.0	-32.8		
120.012	53.6	12.9	3.0	38.5	31.0	53.0	-22.0		
144.200	42.7	14.5	3.3	38.5	21.9	53.0	-31.1		
160.012	65.2	15.2	3.5	38.5	45.3	53.0	-7.7		
200.012	57.3	17.0	3.9	38.6	39.6	53.0	-13.4		
240.012	51.4	17.0	4.3	38.7	34.1	53.0	-18.9		
280.012	52.7	18.3	4.7	38.6	37.1	53.0	-15.9		
320.000	46.3	15.1	5.0	38.5	27.9	53.0	-25.1		
360.000	48.0	16.3	5.3	38.6	31.0	53.0	-22.0		
Horizontal Po	olarization								
62.100	48.1	7.8	2.2	38.5	19.6	53.0	-33.4		
120.000	48.8	12.9	3.0	38.5	26.2	53.0	-26.8		
147.072	47.5	14.6	3.3	38.5	26.8	53.0	-26.2		
160.000	66.1	15.2	3.5	38.5	46.3	53.0	-6.7		
200.000	57.7	17.0	3.9	38.6	39.9	53.0	-13.1		
240.012	47.6	17.0	4.3	38.7	30.3	53.0	-22.7		
280.012	51.6	18.3	4.7	38.6	36.0	53.0	-17.0		
320.000	47.6	15.1	5.0	38.5	29.2	53.0	-23.8		
360.000	45.8	16.3	5.3	38.6	28.8	53.0	-24.2		

Test Personnel:

Channel I, Large Area Antenna								
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	neter limit	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average	
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin	
Vertical Pola	rization							
36.864	40.0	15.7	1.7	38.5	19.0	53.0	-34.0	
40.000	45.6	14.4	1.8	38.5	23.3	53.0	-29.7	
62.100	47.3	7.8	2.2	38.5	18.8	53.0	-34.2	
110.592	41.3	11.4	2.9	38.6	17.1	53.0	-35.9	
120.000	57.5	12.9	3.0	38.5	34.9	53.0	-18.1	
124.200	43.8	13.2	3.1	38.5	21.5	53.0	-31.5	
147.426	48.9	14.6	3.3	38.5	28.2	53.0	-24.8	
149.426	45.4	14.8	3.3	38.5	25.0	53.0	-28.0	
160.000	61.8	15.2	3.5	38.5	42.0	53.0	-11.0	
224.115	35.1	17.2	4.1	38.6	17.8	53.0	-35.2	
240.000	49.6	17.0	4.3	38.7	32.3	53.0	-20.7	
298.828	32.0	19.1	4.8	38.6	17.3	53.0	-35.7	
320.000	45.6	15.1	5.0	38.5	27.1	53.0	-25.9	
360.000	46.9	16.3	5.3	38.6	29.9	53.0	-23.1	
Horizontal Po	olarization							
40.000	37.1	14.4	1.8	38.5	14.7	53.0	-38.3	
62.100	33.6	7.8	2.2	38.5	5.1	53.0	-47.9	
120.000	50.1	12.9	3.0	38.5	27.4	53.0	-25.6	
149.439	42.4	14.8	3.3	38.5	21.9	53.0	-31.1	
160.000	62.3	15.2	3.5	38.5	42.4	53.0	-10.6	
320.000	44.5	15.1	5.0	38.5	26.1	53.0	-26.9	
360.000	49.6	16.3	5.3	38.6	32.6	53.0	-20.4	

Test Personnel:

Channel H, Large Area Antenna

Out of Band Measurements

Out of Dana i	Out of Band Measurements									
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 meter limit				
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average			
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin			
Vertical Polar	rization									
36.864	38.2	15.7	1.7	38.5	17.2	53.0	-35.8			
40.000	45.8	14.4	1.8	38.5	23.4	53.0	-29.6			
55.296	44.8	9.2	2.1	38.5	17.5	53.0	-35.5			
80.000	27.9	6.8	2.4	38.6	-1.4	53.0	-54.4			
110.592	38.6	11.4	2.9	38.6	14.4	53.0	-38.6			
120.000	51.2	12.9	3.0	38.5	28.6	53.0	-24.4			
129.024	27.1	13.7	3.1	38.5	5.3	53.0	-47.7			
147.456	36.7	14.6	3.3	38.5	16.1	53.0	-36.9			
151.802	44.2	15.0	3.3	38.5	23.9	53.0	-29.1			
160.000	63.9	15.2	3.5	38.5	44.1	53.0	-8.9			
184.320	36.4	16.5	3.7	38.6	18.1	53.0	-34.9			
200.000	50.2	17.0	3.9	38.6	32.4	53.0	-20.6			
227.704	34.4	17.0	4.1	38.6	16.9	53.0	-36.1			
240.001	50.8	17.0	4.3	38.7	33.4	53.0	-19.6			
280.000	44.6	18.3	4.7	38.6	29.0	53.0	-24.0			
319.989	47.7	15.0	5.0	38.5	29.2	53.0	-23.8			
359.989	39.0	16.1	5.3	38.6	21.8	53.0	-31.2			

Test Personnel:

Tester Name:

Daniel C. Swann

Channel H, Large Area Antenna								
Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10 m	neter limit	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average	
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin	
Horizontal Po	olarization							
120.000	44.7	12.9	3.0	38.5	22.1	53.0	-30.9	
151.799	42.9	15.0	3.3	38.5	22.6	53.0	-30.4	
151.800	42.9	15.0	3.3	38.5	22.6	53.0	-30.4	
160.000	59.3	15.2	3.5	38.5	39.4	53.0	-13.6	
184.320	36.0	16.5	3.7	38.6	17.7	53.0	-35.3	
184.320	39.9	16.5	3.7	38.6	21.6	53.0	-31.4	
200.000	51.7	17.0	3.9	38.6	33.9	53.0	-19.1	
202.752	31.5	17.1	3.9	38.6	14.0	53.0	-39.0	
227.699	34.0	17.0	4.1	38.6	16.5	53.0	-36.5	
240.000	41.7	17.0	4.3	38.7	24.4	53.0	-28.6	
280.000	42.7	18.3	4.7	38.6	27.1	53.0	-25.9	
320.000	46.2	15.1	5.0	38.5	27.8	53.0	-25.2	
359.989	49.0	16.1	5.3	38.6	31.9	53.0	-21.1	

Test Personnel:

Tester Name:

Daniel C. Swann

5.2 Field Strength Calculations

The field strength was calculated from the following formula:

FIELD STRENGTH = MEASURED SIGNAL + CORRECTION FACTOR

Where MEASURED SIGNAL = Spectrum Analyzer amplitude, in dBuV

CORRECTION FACTOR = AF + CF - GAIN, in dB/m

AF = antenna factor, in dB/m

CF = cable attenuation factor, in dB

GAIN = pre-amplifier gain, in dB, minus any attenuation used

For example, at 160.000 MHz in vertical polarization, broadband antenna, out of band measurement, Channel A, an average reading of 65.4 dBuV was measured, and the antenna factor is 15.2 dB/m, the cable loss is 3.5 dB, and the pre-amplifier gain is 38.5 dB.

FS
$$(dBuV/m) = 65.4 + 15.2 + 3.5 - 38.5$$

FS (dBuV/m) = 45.6 dBuV/m

FCC Part 15.237 Limit, out of band, = 53.0 dBuV/m at 10 meters measurement distance.

6 APPENDIX

6.1 Plots of Occupied Bandwidth

Following are the plots of the Plots of Occupied Bandwidth of Part15.237 limits for measurements made on July 23, 1999, August 4, 1999 and August 5,1999 by Daniel Swann, Roger Davis and Lee Henderson.

Measurements were made at 10 meter measurement distance. Part 15.237 Intentional Radiator test limits were scaled from 3 meter test distance to 10 meter test distance using the scale factor 20*LOG(3/10), or -10.5 dB. The out of band emissions limit is 1500 microvolts/meter at 3 meters, or 63.5 dBuV/meter at 3 meters, or 53.0 dBuV/meter at 10 meters. An attenuation of 20 dB was used, as reflected in the amplifier gain of 18.6 dB. Measurements were made in vertical polarization based on earlier measurements showing that vertical polarization is about 20 dB higher than horizontal polarization.

The out of band measurement limit was calculated from the following:

6.6

Frequency	Measured	Antenna	Cable	Amplifier	Field	Part 15.237 10	meter limit	
MHz	Amplitude	Factor	Loss	Gain	Strength	Average	Average	
	dBuV	dB/m	dB	dB	dBuV/m	dBuV/m	Margin	
Channel I								
for zero dB margin, i.e. the maximum signal for part 15.237 out of band limit, the calculation is:								

2.4 18.6

53.0

53.0

Thus, the receiver input level for a signal at the part 15.237 out of band limit is 62.6 dBuV

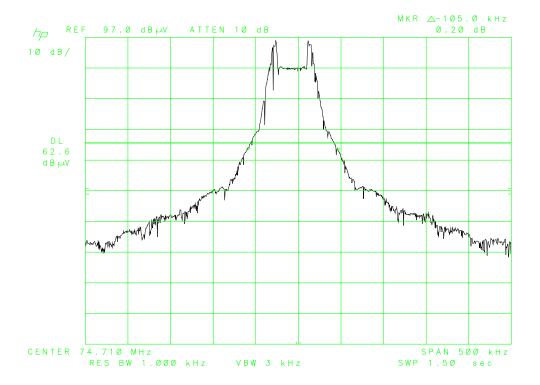
74.710

62.6

0.0

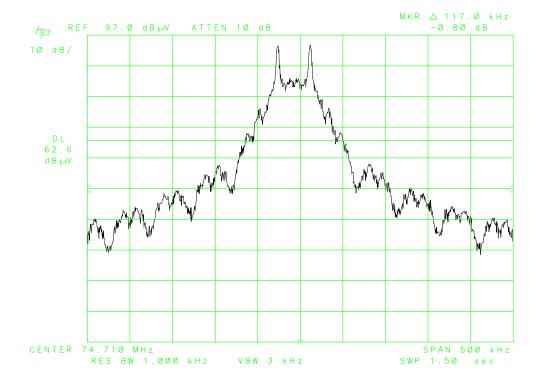
6.1 Plots of Occupied Bandwidth

Plot of occupied bandwidth at 100 Hz modulation. Display line, set at 62.6 dBuV denotes the out of band emission limit of 1500 uV/meter at 3 meter measurement distance. The emission bandwidth at 62.6 dBuV limit is 98.8 kHz, under the limit of 200 kHz.



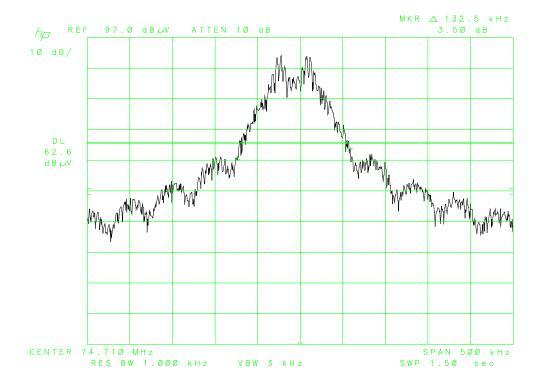
6.1 Plots of Occupied Bandwidth (continued)

Plot of occupied bandwidth at 1 kHz modulation. Display line, set at 62.6 dBuV denotes the out of band emission limit of 1500 uV/meter at 3 meter measurement distance. The emission bandwidth at 62.6 dBuV limit is 117.0 kHz, under the limit of 200 kHz.



6.1 Plots of Occupied Bandwidth (continued)

Plot of occupied bandwidth at 5 kHz modulation. Display line, set at 62.6 dBuV denotes the out of band emission limit of 1500 uV/meter at 3 meter measurement distance. The emission bandwidth at 62.6 dBuV limit is 132.5 kHz, under the limit of 200 kHz.



6.3 List of Exhibits

Internal photographs. See file "Internal Photos.doc" External photographs. See file "External Photos.doc" Test set up photographs. See file "Test Setup Photos.doc" Block Diagram. See file "Block Diagram.doc" Schematic Diagram. See file "Schematic.doc" Theory of Operation. See file "Operational Description.doc" User Guide. See file "User Guide.doc" FCC Label. See file "FCC ID label and label location.doc" LH-TNC Printed Circuit Board Connector. See file "RT-1208.pdf" LH-TNC Bulkhead Connector. See file "RT-1211-1.pdf" LH-TNC Cable Connector. See file "RT-1200-C.pdf" LH-TNC Right Angle Adapter. See file "RT-1227.pdf" Whip Antenna w/ LH-TNC Connector. See file "CAF25862.pdF" Antenna Ground Plane with Connector Kit. See file "AT0775.pdf" Antenna Ground Plane with 50' Cable. See file "AT0776.pdf" LH-TNC Cable Connector Kit. See file "AT0778.pdf" LH-TNC Cable, 50ft. See file "AT0779.pdf"