



**Technical Report to the FCC and Industry Canada Regarding  
Johnson Controls Interiors, L.L.C. Homelink® IV**

**Model: 281AHL4  
FCC ID: CB2281AHL4  
IC: 279B- 281AHL4  
Emission Designator : 140KL1D  
5/14/2010**

A report concerning approval for Johnson Controls Homelink® model 281AHL4  
Please issue grant immediately upon review.

Measurements Made by:

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Bolay Elgersma  
RF Test Site Technician  
Johnson Controls Interiors, LLC.

Measurements Reviewed by:

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Report Submitted by:

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Edward Thomsen  
Test / EMC Engineer  
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# 1. General Information

## 1.1. Product Description:

The Johnson Controls Interiors HomeLink® HL4 Universal Garage Door Opener is a low-power transceiver OEM device that is installed into an overhead area of the automobile. The installation is provided by trained technicians during the course of the manufacture of the automobile. It is powered by the 12 Volt system of the automobile.

This Universal Garage Door Opener has the capability to

1. Learn the frequency and bit code format of the user's existing garage door remote control devices and
2. Reproduce and transmit the frequency and bit code format to remotely operate the user's garage door.

The unit is designed for the periodic operation of a control signal, which typically activates a garage door opener receiver.

The unit is supplied to the automobile manufacturer without harness. For testing purposes a typical assembly and 2-conductor cable harness were used to power to the unit.

The unit is only operational when the user depresses the control button. It becomes inactive after release of the control button.

The three-button HomeLink® unit replaces up to three hand-held transmitters. In addition to the typical operation of the garage door, the unit will learn the radio frequency codes of other transmitter types to activate entry door locks, estate gates, security systems, and home or office lighting.

The antenna system is an integral part of the unit. It cannot be altered nor replaced by the user. Service of this system is only available from the Automobile Manufacturer's Dealerships and Johnson Controls Interiors, LLC.

## 1.2. Related Grants

None.

## 1.3. Test Methodology

Radiated Emissions testing was performed according to ANSI C63.4-2003. The power source for this product is a 12V automotive vehicle battery, thus conducted emissions measurements are not required.

The unit is supplied to the automobile manufacturer without harness. For testing purposes a 2-conductor cable harness was used to interface to the unit.

## 1.4. Test Facility

The Open Area Test Site where these measurements were taken, is located on the grounds of Johnson Controls Automotive Interiors System's Edgar D. Prince Technical Campus, in the city of Holland, county of Ottawa, state of Michigan, United States of America. The site is a fully enclosed 10m weather-protected OATS. All structure materials above the conducting ground-plane are non-metallic and consist of wood, laminated lumber, fiberglass, glue, plastic, or fiberglass reinforced plastic. The site contains a 15-foot diameter turntable capable of supporting large cars and light trucks under test. Tabletop testing was conducted on a smaller 3m turntable described in the site recertification report. The test site has been fully described in a reports filled with the FCC and Industry Canada. The report filed with the FCC is dated January 6, 2009, was accepted by the FCC in a letter dated January 08, 2009. The report filled with Industry Canada, dated January 6, 2009, was accepted via a letter dated June 18, 2009. Our OATS is registered with the IC under file number IC# 279B-1.

## 1.5. Accreditation

The Johnson Controls, Inc. - Electronics Validation Lab is accredited to ISO 17025 by the American Association for Laboratory Accreditation (A2LA). Our laboratory scope and accreditation certificate (#1425.02) are available from their web site [www.a2la.org](http://www.a2la.org). Our scope of accreditation covers ANSI C63.4 Radiated Emissions at 3m, FCC 47 CFR Part 15, and IC RSS-210.

## 2. Product Labeling

The FCC Identifier assigned is FCC ID: CB2281AHL4. The Industry Canada certification number is 279B-281AHL4. These identifiers will be labeled on the product housing.

The label will be placed on the exterior of the HL4 housing using an acrylic adhesive that will permanently affix the label.

Because of the small size of the device and because the installation is inside a portion of the automobile, the following statements will appear in the user's manual. Refer to attachment "Users Manual.pdf" for the entire text of the user's manual.

"This device complies with Part 15 of the FCC rules and with RSS-210 of the Industry Canada. Operation is subject to the following two conditions:

- (1) This device may not cause harmful interference,
- (2) This device must accept any interference that may be received including interference that may cause undesired operation.

WARNING: The transmitter has been tested and complies with FCC and Industry Canada rules. Changes or modifications not expressly approved by the party responsible for the compliance could void the user's authority to operate the device."

### 2.1. Label Drawing and Location on Product.

The label drawing is included in the "FCC ID Label Artwork.pdf" attachment. A diagram showing the location of the label on the assembly is included in the "Label\_Location.pdf" attachment.

### 3. Test Configuration

Radiated Emission measurements presented in the report were made in accordance with ANSI C63.4 Figure 9(c). The EUT was placed on a 1 x 1.5m non-metallic table elevated 80cm above a conducting ground plane. The harness was run to the long edge of the table and dropped to a power supply sitting at base of the table.



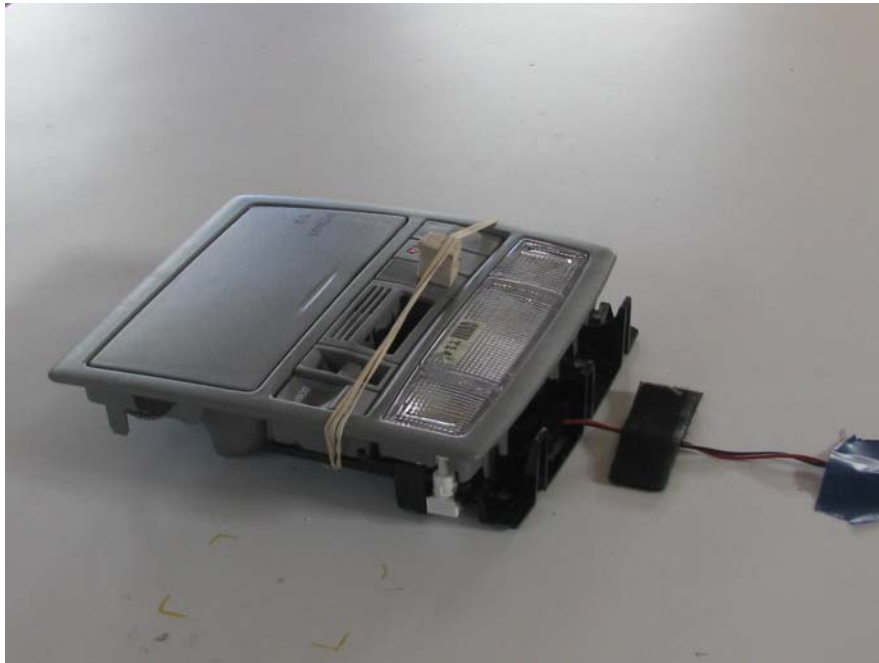
### 4. Block Diagram

For system block diagram please refer to attachment named "Block Diagram.pdf"

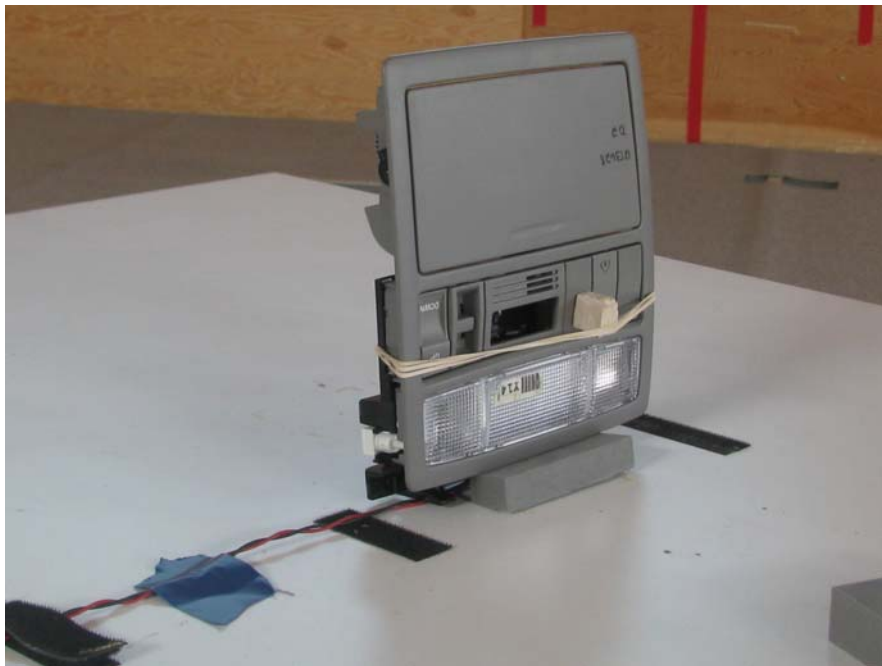
### 5. Test Setup Photographs



Test Setup Side



Test Setup Flat



Test Set Up End

## 6. Conducted Emissions Measurements

Conducted Measurements are not required for this product.

## 7. Radiated Emissions Data

### 7.1. Summary of Results

- Measurements of the transmit output field strength were taken with the DUT trained to 288, 310, and 433MHz at 30%, 50% and 80% duty cycles. A **worst-case emission of 85.37dBuV/m** occurred with the DUT trained to 433MHz, 50% duty cycle. The worst-case emission Average Level (79.4dBuV/m) remained **1.45dB below the FCC and IC limits** (86.8 dBuV/m) for this type of device.
- The **worst-case harmonic measurement of 47.94 dBuV/m was found at 1550 MHz**, the second harmonic of 310 MHz at 80% duty cycle. **A margin of 8.0dB to the prescribed limit was noted.** When adjusted for the duty cycle.
- This module exhibits pulsed operation characteristics.
- Measurements were taken of the 20dB occupied bandwidth. The transmitter had a maximum occupied bandwidth of 140kHz when the DUT is trained to 288 MHz, 80% duty cycle.
- This device has a worst case digital emission of 35.99dBuV/m at 234MHz when set to transmit at 433MHz a margin of 4.01 to the FCC Class B and relevant IC limit is maintained.
- The output power of the DUT increased by no more than 0.83 dB when the input voltage was varied from 6 to 18 Volts. The device does not operate when the input voltage is below 7V and power reduced to 83.66dBuV/m at 7V.
- The device was found to be incapable of operating in restricted bands.
- The device deactivated immediately after the activation button is depressed. Less than 5 sec.
- The device uses pulses to tune the transmit antenna. At 288MHz, 30% duty cycle the field strength of the pulses average 759uV/m over 100 msec. This represents a margin of 23.2dB to the IC and FCC limits.
- The worst case receiver spurious emissions measurement was made at the mid-point of the receiver band capability. A measurement of 48.27uV at 3m, at the tuned frequency of 368 Mhz.

## 7.2. Test Equipment Used

<u>Description</u>	<u>Model #</u>	<u>Serial Number</u>	<u>Last Cal Date</u>	<u>Cal Due</u>
EMCO Biconical Antenna [20-300 MHz]	3110B	9906-3309	11/26/09	11/26/11
EMCO LPA Antenna [200-2000MHz]	3148	9908-1076	11/26/09	11/26/11
Electro- metrics Double Ridged Guide [1-18GHz]	RGA-60	6147	01/02/09	01/02/11
Agilent E-series EMC Analyzer	E4407B	US41192569	10/15/09	10/15/10
HP Spectrum Analyzer	8591A	S919A00107	01/20/10	10/15/2011

## 7.3. Test Equipment Setup and Procedure

Spectrum Analyzer Settings Emissions:

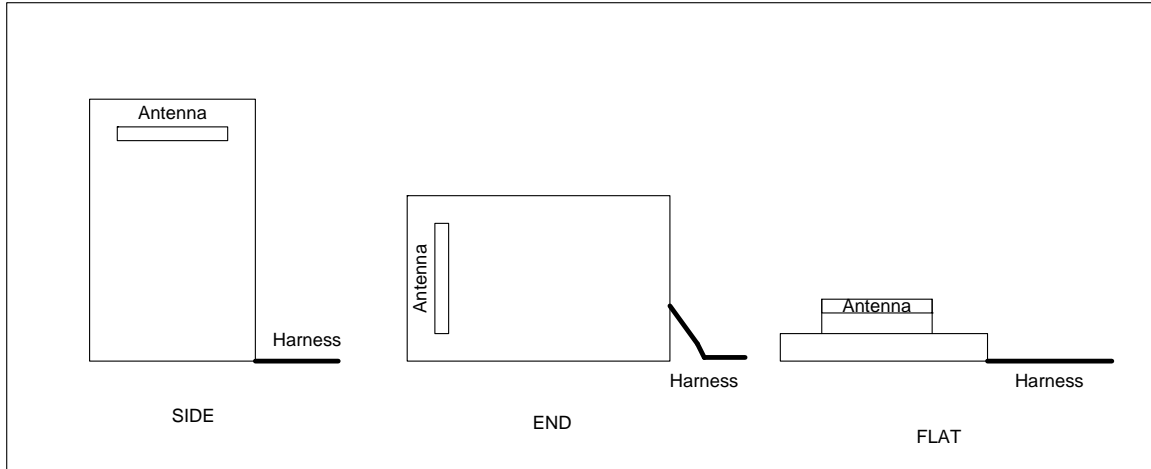
Detector Function :Peak  
Resolution Bandwidth :120kHz (below 1GHz)  
:1MHz (above 1GHz)  
Video Bandwidth: :300kHz (below 1GHz)  
:3MHz (above 1GHz)

Spectrum Analyzer Settings Occupied Bandwidth:

Detector :Peak  
Resolution Bandwidth :3 MHz ( to determine peak level)  
:10 kHz (to determine occupied bandwidth)  
Video Bandwidth :3 MHz ( to determine peak level)  
:30 kHz (to determine occupied bandwidth)

For the testing, the EUT was placed at the center of a non-conducting table 80cm above the ground plane pursuant to ANSI C63.4 for stand-alone equipment. The 2-conductor cable harness was routed to the edge of the long side of the table then down to the power supply located on the turntable base.

Equipment is placed in one of the three orthogonal orientations, End, Side, and Flat. These orientations are described below in Figure 7.3.1.



**Figure 7.3.1 EUT Orthogonal Orientations**

While in the prescribed orientation, the vertical antenna positioner sweeps in elevation from 1 to 4m in height until the operator finds the peak. The 3m turntable is then rotated through 360 degrees until a peak is found. The table is stopped at the peak location and the peak in elevation re-verified. Procedure is repeated for applicable orientations/measurement antenna polarizations.

## 7.4. Measured Data

### 7.4.1. Measurements of Fundamentals and Harmonics

Measurements described in this section were taken according to ANSI C63.4-2003 on the Johnson Controls 3m test table.

#### 7.4.1.1 DUT Tuned to 288MHz(Fundamental)

Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
288	Side	H	30	77.86	-10.46	67.40	73.83	6.43
288	Side	H	50	74.77	-6.02	68.75	73.83	5.08
288	Side	H	80	70.72	-1.94	68.78	73.83	<b>5.05</b>

\*Measurements include Cable corrections and Antenna Factors

#### 7.4.1.2 DUT Tuned to 310MHz (Fundamental)

Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
310	Side	H	30	84.26	-10.46	73.80	75.32	<b>1.52</b>
310	Side	H	50	79.68	-6.02	73.66	75.32	1.66
310	Side	H	80	75.24	-1.94	73.30	75.32	2.02

\* Measurements include Cable corrections and Antenna Factors



**7.4.1.3 DUT Tuned to 433MHz (Fundamental)**

Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
433	End	V	30	89.72	-10.46	79.26	80.79	1.53
433	End	V	50	85.37	-6.02	79.35	80.79	<b>1.45</b>
433	End	V	80	81.04	-1.94	79.10	80.79	1.69

\* Measurements include Cable corrections and Antenna Factors

**7.4.1.4 288MHz (Harmonics)**

Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
576	Side	H	30	52.94	-10.46	42.48	53.80	11.32
576	Side	H	50	45.44	-6.02	39.42	53.83	14.41
576	Side	H	80	41.99	-1.94	40.05	53.83	13.78
864	Flat	V	30	41.26	-10.46	N/A	53.83	N/A
864	Flat	V	50	42.66	-6.02	N/A	53.83	N/A
864	Flat	V	80	42.57	-1.94	N/A	53.83	N/A
1152	Flat	H	30	42.29	-10.46	31.83	53.83	22.00
1152	Flat	H	50	40.89	-6.02	34.87	53.83	18.96
1152	Flat	H	80	41.99	-1.94	40.05	53.83	13.78
1440	Flat	H	30	49.10	-10.46	38.64	53.83	15.19
1440	Flat	H	50	48.73	-6.02	42.71	53.83	11.12
1440	Flat	H	80	46.94	-1.94	45.00	53.83	8.83
1728	Flat	H	30	45.75	-10.46	35.29	53.83	18.54
1728	Flat	H	50	43.36	-6.02	37.34	53.83	16.49
1728	Flat	H	80	43.24	-1.94	41.30	53.83	12.53
2016	Flat	H	30	44.71	-10.46	34.25	53.83	19.58
2016	Flat	H	50	44.23	-6.02	38.21	53.83	15.62
2016	Flat	H	80	41.26	-1.94	39.32	53.83	14.51
2304	Side	V	30	Noise	-10.5	N/A	53.8	N/A
2304	Side	V	50	Noise	-6.0	N/A	53.8	N/A
2304	Side	V	80	Noise	-1.9	N/A	53.8	N/A
2592	Flat	V	30	Noise	-10.5	N/A	53.8	N/A
2592	Flat	V	50	Noise	-6.0	N/A	53.8	N/A
2592	Flat	V	80	Noise	-1.9	N/A	53.8	N/A
2880	Flat	V	30	Noise	-10.5	N/A	53.8	N/A
2880	Flat	V	50	Noise	-6.0	N/A	53.8	N/A
2880	Flat	V	80	Noise	-1.9	N/A	53.8	N/A

Noise Ambient

\* Measurements include Cable corrections and Antenna Factors

### 7.4.1.5 310MHz (Harmonics)

Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
<b>619</b>	End	H	30	50.78	-10.5	40.3	55.3	15.0
619	Flat	H	50	49.44	-6.02	43.42	55.32	11.90
619	Flat	H	80	45.61	-1.94	43.67	55.32	11.65
930	Side	H	30	45.21	-10.46	34.75	55.32	20.57
930	Side	H	50	43.93	-6.02	37.91	55.32	17.41
930	Side	H	80	42.50	-1.94	40.56	55.32	14.76
1238	End	V	30	50.93	-10.46	40.47	54.00	13.53
1238	End	V	50	48.39	-6.02	42.37	54.00	11.63
1238	End	V	80	46.33	-1.94	44.39	54.00	9.61
1547.5	Side	V	30	50.54	-10.46	40.08	54.00	13.92
1547.5	Side	V	50	48.63	-6.02	42.61	54.00	11.39
1547.5	Side	V	80	47.94	-1.94	46.00	54.00	8.00
1857	Side	V	30	Noise	-10.5	N/A	55.32	N/A
1857	Side	V	50	Noise	-6.0	N/A	55.32	N/A
1857	Side	V	80	Noise	-1.9	N/A	55.32	N/A
2166.5	End	V	30	Noise	-10.5	N/A	55.3	N/A
2166.5	End	V	50	Noise	-6.0	N/A	55.3	N/A
2166.5	End	V	80	Noise	-1.9	N/A	55.3	N/A
2476	End	V	30	Noise	-10.5	N/A	55.3	N/A
2476	Flat	V	50	Noise	-6.0	N/A	55.3	N/A
2476	End	V	80	Noise	-1.9	N/A	55.3	N/A
2785.5	End	V	30	Noise	-10.5	N/A	55.3	N/A
2785.5	End	V	50	Noise	-6.0	N/A	55.3	N/A
2785.5	End	V	80	Noise	-1.9	N/A	55.3	N/A
3095	Side	V	30	Noise	-10.5	N/A	55.3	N/A
3095	Side	V	50	Noise	-6.0	N/A	55.3	N/A
3095	Side	V	80	Noise	-1.9	N/A	55.3	N/A

Noise Ambient

Measurements include Cable corrections and Antenna Factors

### 7.4.1.6 433 MHz (Harmonics)

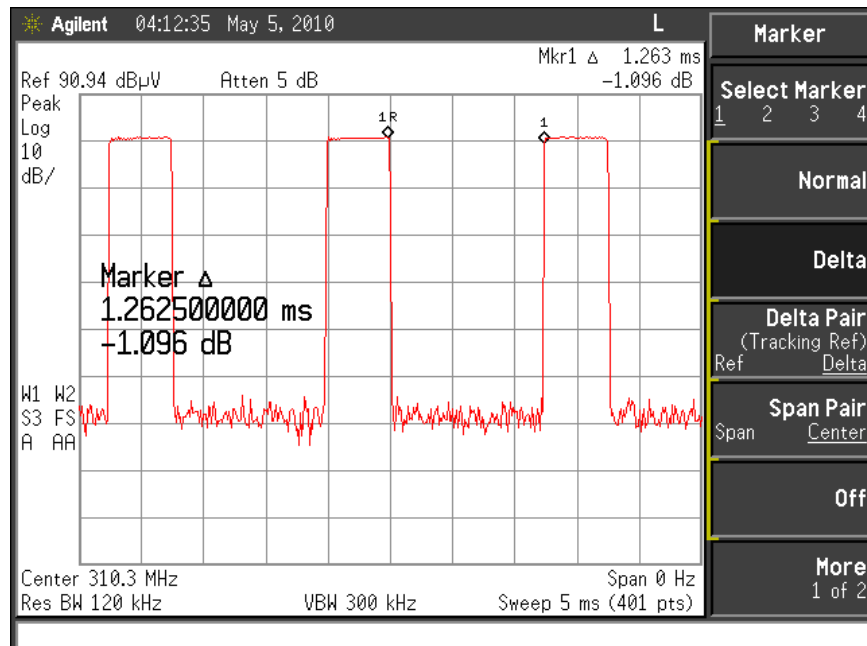
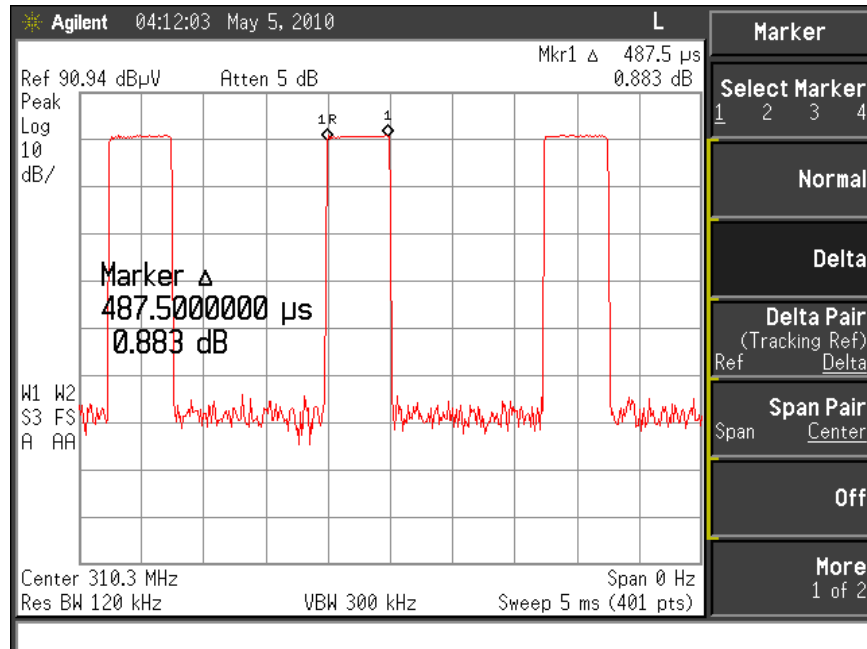
Frequency (MHz)	Orientation (Flat/End/Side)	Measurement Polarization (H/V)	Duty Cycle (%)	Measurement* (dBuV/m)	Duty Cycle Correction (dB)	Average Level (dBuV/m)	FCC Limit (dBuV/m)	Margin (dB)
866	Side	V	30	61.05	-10.46	50.59	60.79	10.20
866	Side	V	50	55.67	-6.02	49.65	60.79	11.15
866	Side	V	80	51.98	-1.94	50.04	60.79	10.75
1299	End	V	30	47.63	-10.46	37.17	60.79	23.62
1299	End	V	50	45.50	-6.02	39.48	60.79	21.32
1299	End	V	80	43.20	-1.94	41.26	60.79	19.53
1732	Flat	H	30	46.65	-10.46	36.19	54.00	17.81
1732	Flat	H	50	45.89	-6.02	39.87	54.00	14.13
1732	Flat	H	80	45.01	-1.94	43.07	54.00	10.93
2165	Flat	H	30	Noise	-10.5	Noise	60.8	Noise
2165	Flat	H	50	Noise	-6.0	Noise	60.8	Noise
2165	End	H	80	Noise	-1.9	Noise	60.8	Noise
2598	Side	V	30	Noise	-10.5	Noise	60.8	Noise
2598	Side	V	50	Noise	-6.0	Noise	60.8	Noise
2598	Side	V	80	Noise	-1.9	Noise	60.8	Noise
3031	End	V	30	Noise	-10.5	Noise	60.8	Noise
3031	End	V	50	Noise	-6.0	Noise	60.8	Noise
3031	End	V	80	Noise	-1.9	Noise	60.8	Noise
3464	Flat	V	30	Noise	-10.5	Noise	60.8	Noise
3464	Flat	V	50	Noise	-6.0	Noise	60.8	Noise
3464	Flat	V	80	Noise	-1.9	Noise	60.8	Noise
3897	End	V	30	Noise	-10.5	Noise	54.0	Noise
3897	End	V	50	Noise	-6.0	Noise	60.8	Noise
3897	End	V	80	Noise	-1.9	Noise	60.8	Noise
4330	Side	H	30	Noise	-10.5	Noise	54.0	Noise
4330	Side	H	50	Noise	-6.0	Noise	60.8	Noise
4330	Side	H	80	Noise	-1.9	Noise	60.8	Noise

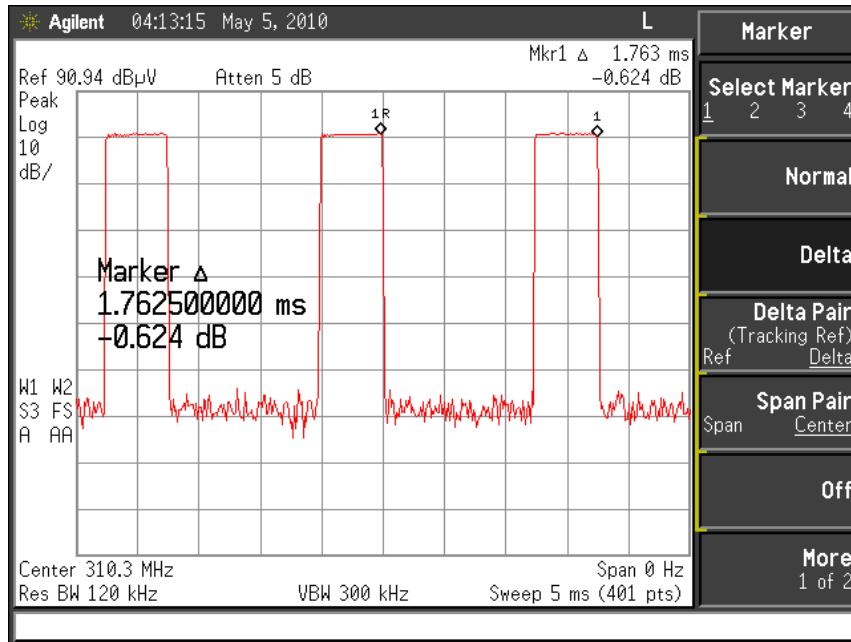
\* Measurements include Cable corrections and Antenna Factors

## 7.4.2 Pulsed Operation

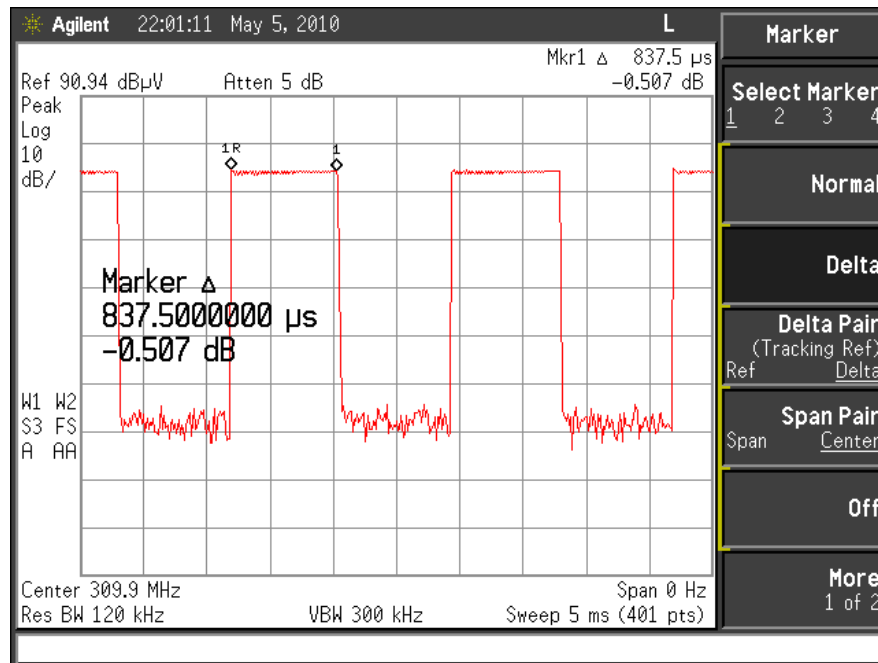
The Homelink© transmitter tested here transmits pulses using amplitude modulation with varying duty cycle. Verification of pulse operation at 30, 50 and 80% duty cycles is provided here. Measurements were taken at 310MHz with the span set to zero on the E4407B spectrum analyzer. The duty cycle is 500Hz.

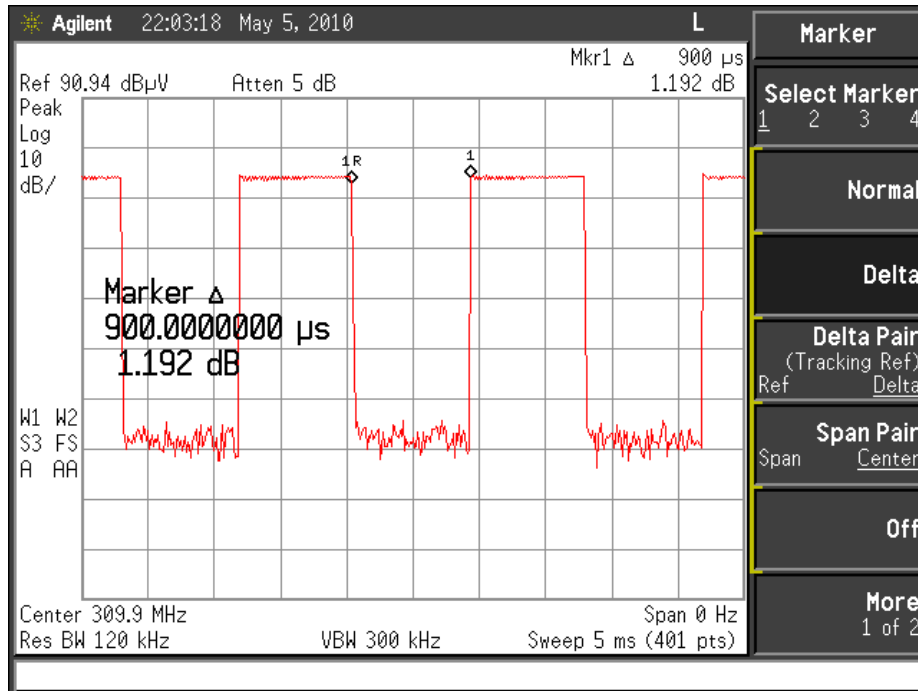
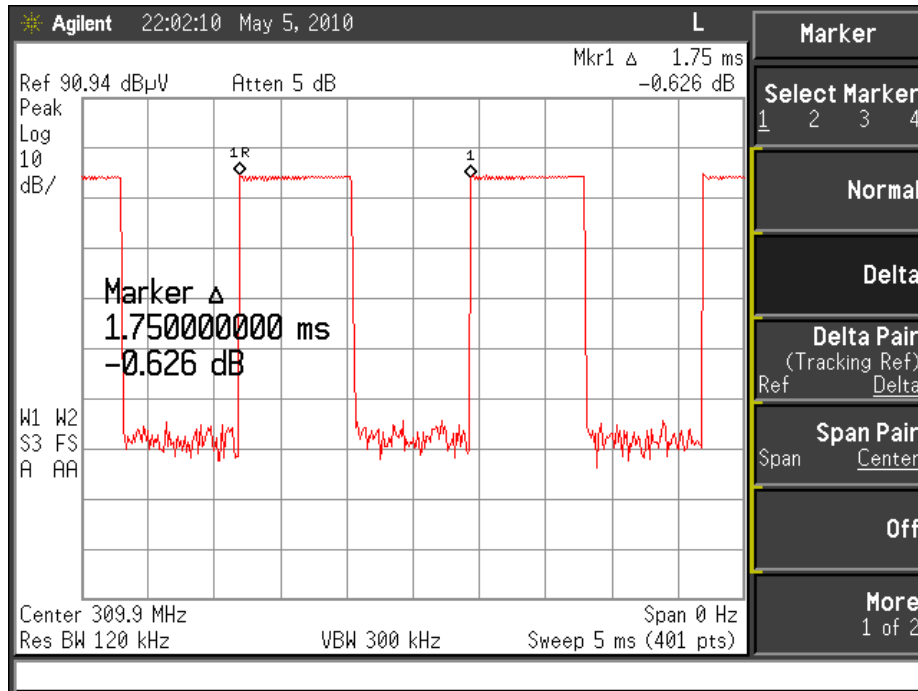
### 7.4.2.1 30% Duty Cycle



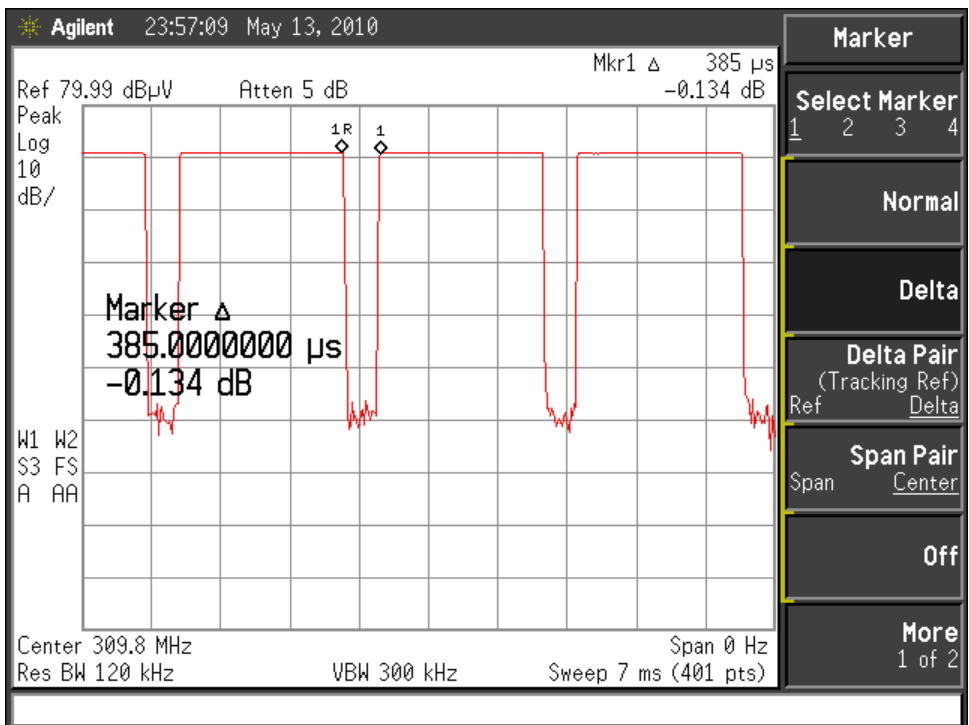
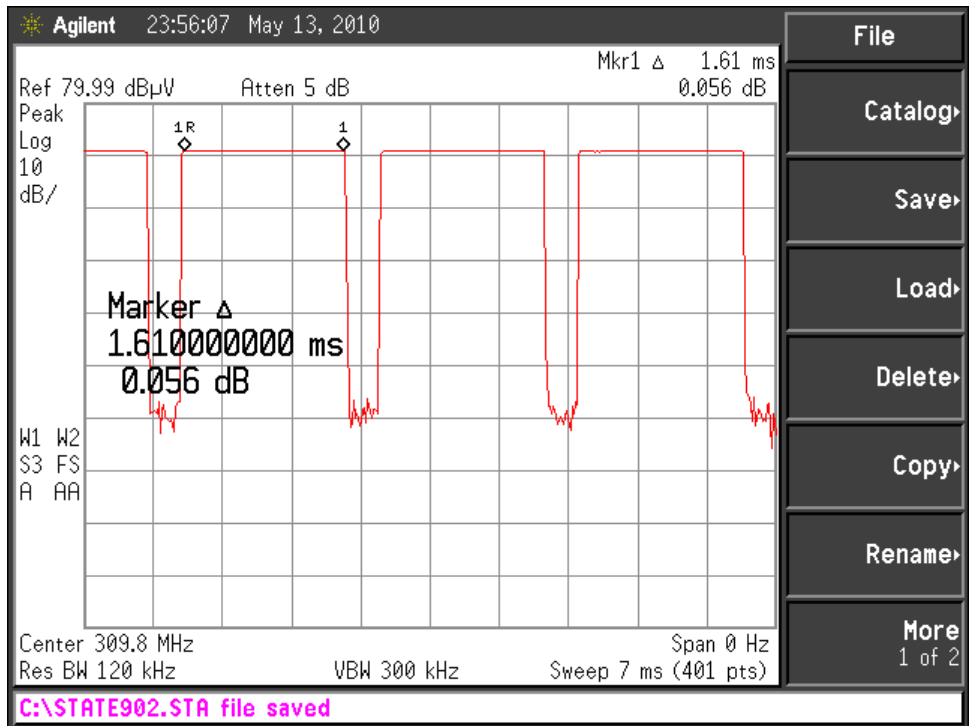


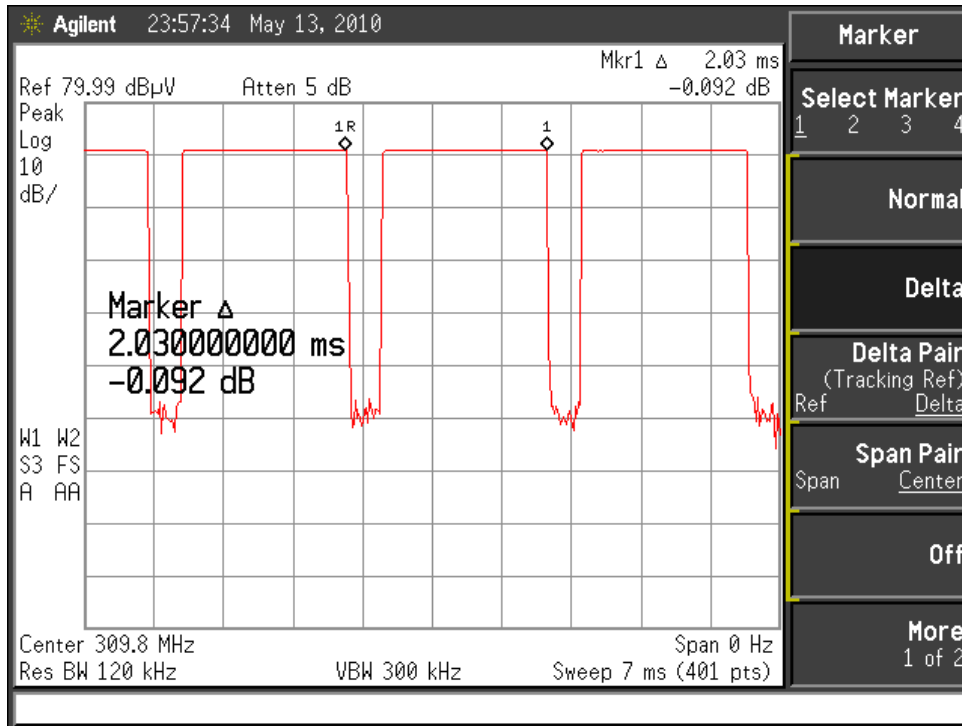
#### 7.4.2.2 50% Duty Cycle





### 7.4.2.3 80% Duty Cycle





### 7.4.3 Occupied Bandwidth

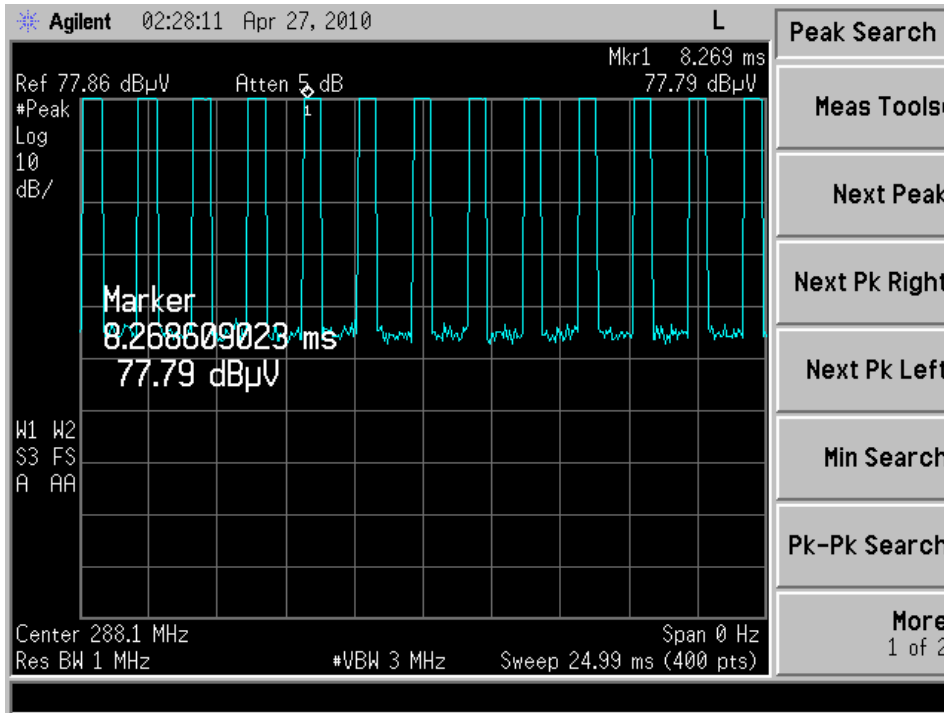
Occupied bandwidth measurements were taken at 288, 310, and 433 MHz. The occupied bandwidth was determined using the 20dB measurement method.

#### 7.4.3.1 Occupied Bandwidth Measurement

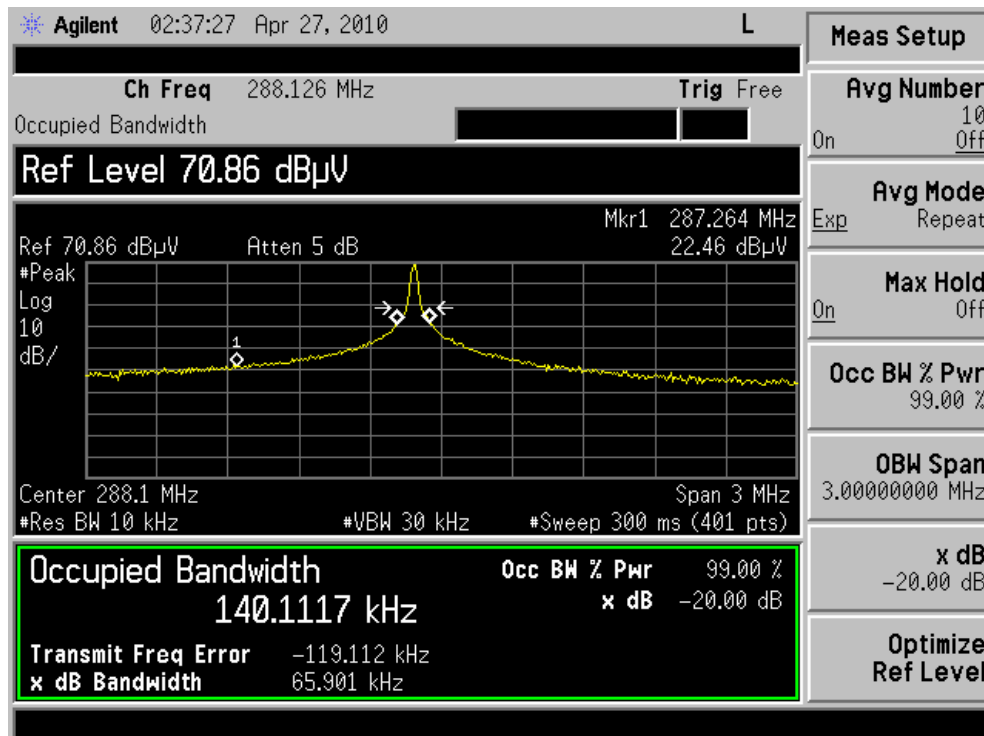
Frequency (MHz)	Duty Cycle (%)	Occupied Bandwidth (kHz)	Limit (kHz)
288	30	102	720
	50	124	720
	80	140	720
310	30	126	775
	50	107	775
	80	120	775
433	30	125	1045
	50	121	1045
	80	126	1045

#### 7.4.3.2 Example of Occupied Bandwidth measurement (288MHz 80% Duty Cycle)





Measuring Peak Reference Level



Measuring Occupied Bandwidth at -20dB points

#### 7.4.4 Emission Spectrum

Prescan Measurements were taken inside a semi-anechoic chamber to investigate the possibility of other spurious emissions from the DUT.

Emissions were noted and measured on the JCI OATS, all measurements were found to be near or below the ambient noise level and well below the FCC and IC limits for spurious emissions. A summary is presented below in section 7.4.4.1

Measurement settings:

Resolution BW :20kHz  
 Video Bandwidth :300kHz  
 Detector :Peak

Note: Pre-scan measurements were made in a semi-anechoic chamber using a Rohde & Schwarz EMI Test Receiver 7GHz. The semi-anechoic chamber and test receiver are part of the Johnson Control Electronics Validation Group.

#### 7.4.4.1 Summary of Emissions Measurements Taken on OATS

Transmitting Frequency (MHz)	Frequency (MHz)	DUT Orientation	Antenna Polarization	Field Strength (dBuV/m)	Limit (dBuV/m)	Margin (dB)
288	38.4	Flat	V	24.12	40	15.88
	44.9	Flat	H	30.86	40	9.14
	55.5	End	H	26.09	40	13.91
	72.5	Side	H	25.83	40	14.17
	86.4	Side	V	29.53	40	10.47
310	46.5	End	V	28.27	40	11.73
	55.6	Flat	H	26.89	40	13.11
	126.5	Side	V	38.85	40	1.15
433	72.5	Flat	H	26.18	40	13.82
	120	End	H	32.68	40	7.32
	155.7	Flat	H	31.92	40	8.08
	145.4	Side	H	26.84	40	13.16
	216.2	Flat	V	30.67	40	9.33
	234.11	Side	H	35.99	40	4.01

#### Ambient

Measurements were made using a peak detector with Resolution BW of 120kHz and Video BW of 300kHz. Cable losses and correction factors included in measurement.

### 7.5 Receiver Spurious Emissions

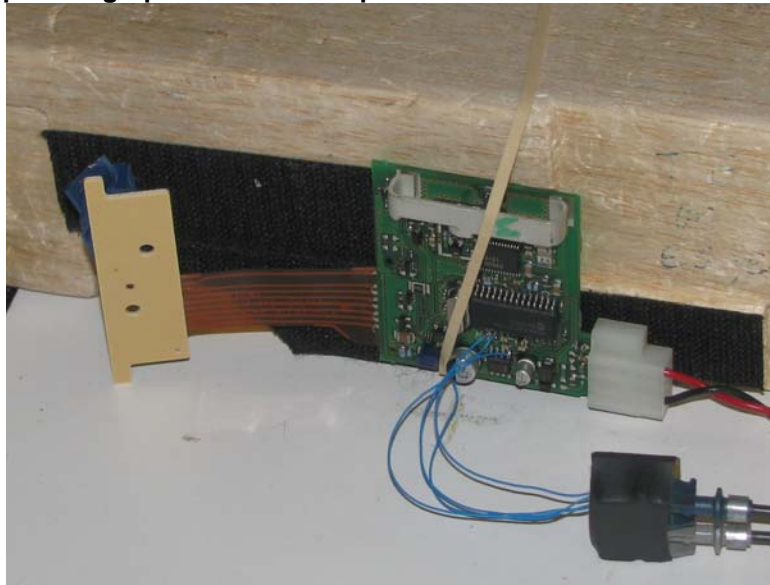
The receiver circuit spurious emissions were measured in accordance to Industry Canada RSS-GEN Issue 2 Section 4.10 and ANSI C63.4-2003.

The band mid point over which the receiver is designed to operate is 368 MHz. The Homelink IV is supplied with commands to place it into diagnostic / manufacturing mode, and tune the receiver to the mid point frequency.

The search for spurious emissions was conducted over a range of 286MHz (The lowest oscillator frequency used by the receiver) to 1350 MHz ( 3 time the highest tunable frequency of 450MHz)

To determine the orientation of the device at which the worst case emissions would occur, exploratory measurements using a diagnostic command to transmit at the midpoint frequency of 368 MHz. The device was then set to receive using a manufacturing diagnostic command.. Refer to 7.5.1 for setup photograph. The device under test is on its side, with the antenna in horizontal polarization.

#### 7.5.1 Setup Photograph for Receiver spurious emissions



Measurements from 286MHz to 1 GHz were made with the spectrum analyzer using the peak detection method.. The resolution bandwidth setting was 120 kHz. Measurements above 1GHz were made using average detector with 300kHz resolution bandwidth. **At the fundamental frequency, 365 MHz, the receiver spurious emissions measurement was 53.96uV/m at 3m.**

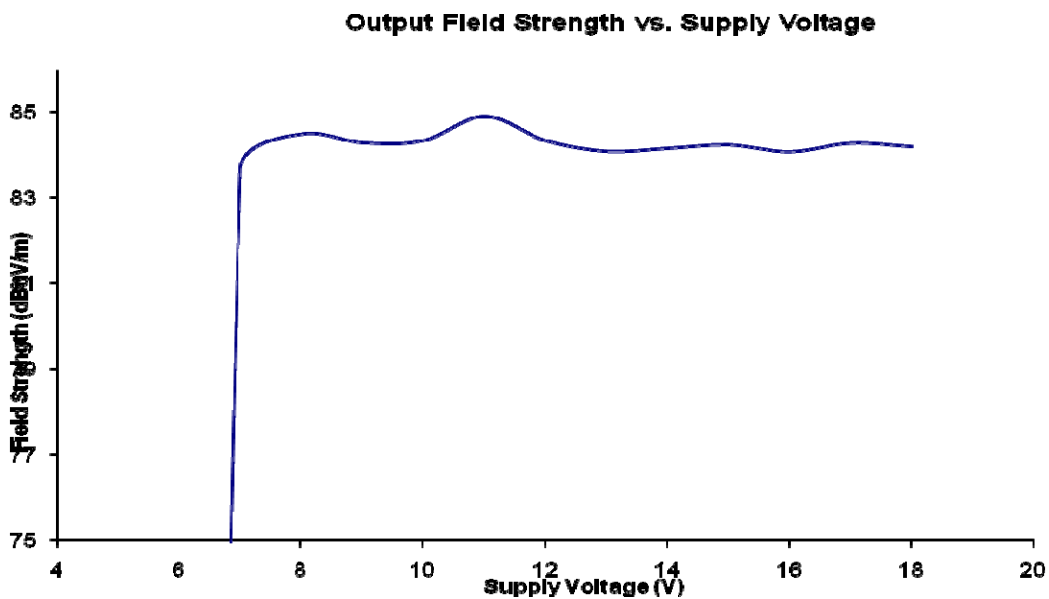
Receive Frequency (MHz)	Frequency (MHz)	DUT Orientation	Antenna Polarization	Field Strength (uV/m)	Limit (uV/m)	Margin (uV/m)
365	296	Side	H	26.53	200	173.47
	323	Side	H	28.69	200	171.31
	377	Side	H	30.85	200	169.15
	379	Side	H	38.55	200	161.45
	649	Side	H	62.92	200	137.08
	999	Side	H	116.7	500	383.3
	1000	Side	H	91.56	500	408.44
	1037	Side	H	139.3	500	360.7
	1040	Side	H	123.14	500	376.86
	1110	Side	H	129.5	500	370.5
	1155	Side	H	134.8	500	365.2
	1195	Side	H	134.1	500	365.9
	1199	Side	H	131.4	500	368.6
1350	Side	H	154.4	500	345.6	

Ambient

## 7.6 Variation of Supply Voltage

Measurements of the variation in output field strength due to variation in the supply voltage were taken in accordance with 15.31(e). The DUT was configured to transmit at 310MHz, 30% Duty Cycle. Values presented are not corrected for duty cycle.

### 7.6.4.1 Plot of output power over supply voltage



### 7.6.4.2 Output power as a function of supply voltage

Voltage	Field Strength (dBuV/m)
6	
7	83.66
8	84.49
9	84.29
10	84.34
11	84.91
12	84.34
13	84.09
14	84.16
15	84.24
16	84.08
17	84.28
18	84.2
19	84.12
20	

## 7.7 Verification of Non-Operation in Restricted Bands

An exercise was undergone to verify that the device was not able to learn and thereby transmit in a restricted band. During this exercise it was found that the device firmware prevents the device from learning any frequency within 1MHz of any restricted band listed in RSS-210 Issue 7, Table 1 and 47 CFR 15.205.

This exercise is described as follows:

### HomeLink Operating Frequencies

HomeLink is designed to transmit from 286 – 450 MHz, with the exception of two regions:

- 321 – 336.4 MHz
- 398.9 – 411 MHz

HomeLink will only transmit at frequencies it is able to train to, therefore to verify HomeLink does not **transmit** outside the designated regions, we must verify that HomeLink does not **train** to signals outside the designated regions.

To verify this, an Agilent E4421B signal generator was set to output a 400 Hz square wave with 100% modulation depth and amplitude -5.00 dBm. It was then verified that HomeLink would train to this signal only when it was transmitted at the proper frequencies. Specifically, various frequencies in the vicinity of the banned region boundaries were tested, and it was verified that HomeLink trained when it saw a signal at a valid frequency, and did not train when it saw a signal at a banned frequency. In the instances where HomeLink trained to a valid frequency, it was then verified that HomeLink transmitted at that same frequency.

One thing that should be noted: HomeLink margin of error is approximately 200 kHz. Therefore it cannot be said that HomeLink will adhere to the specified limits with absolute precision. This is why there is a guard-band of 1MHz around the FCC banned frequencies. For example, the FCC bans transmissions below 285 MHz. By setting HomeLink's lower limit to 286 MHz, we guarantee that HomeLink will not operate below 285 MHz, and in all likelihood, HomeLink will not operate below 285.8 MHz.

See the following table for the exact frequencies tested.

Frequency (MHz)	Part 15 Status	Result	Pass/Fail	Comments
285.0	Banned	would not train	Pass	
285.5	Allowed	would not train	Pass	While this is a valid frequency, HomeLink guardbands this region to ensure it doesn't train to 285 MHz
286.0	Allowed	trained	Pass	
287.0	Allowed	trained	Pass	
319.0	Allowed	trained	Pass	
320.0	Allowed	trained	Pass	
320.5	Allowed	trained	Pass	
321.0	Allowed	trained	Pass	Normally HomeLink guardbands at 321 MHz to ensure it doesn't train at 322 MHz. In this instance, HomeLink thought the signal was 320.83 MHz, and therefore trained. HomeLink transmits the trained signal at 320.983 MHz, which still complies with our FCC submission.
322.0	Banned	would not train	Pass	
323.0	Banned	would not train	Pass	
324.0	Banned	would not train	Pass	
325.0	Banned	would not train	Pass	
326.0	Banned	would not train	Pass	
327.0	Banned	would not train	Pass	
328.0	Banned	would not train	Pass	
329.0	Banned	would not train	Pass	
330.0	Banned	would not train	Pass	
331.0	Banned	would not train	Pass	
332.0	Banned	would not train	Pass	
333.0	Banned	would not train	Pass	
334.0	Banned	would not train	Pass	
335.0	Banned	would not train	Pass	
336.0	Allowed	would not train	Pass	While this is a valid frequency, HomeLink guardbands this region to ensure it doesn't train to 335 MHz
337.0	Allowed	trained	Pass	
338.0	Allowed	trained	Pass	
398.0	Allowed	trained	Pass	
399.0	Allowed	would not train	Pass	While this is a valid frequency, HomeLink guardbands this region to ensure it doesn't train to 399.9 MHz
399.5	Allowed	would not train	Pass	While this is a valid frequency, HomeLink guardbands this region to ensure it doesn't train to 399.9 MHz
400.0	Banned	would not train	Pass	

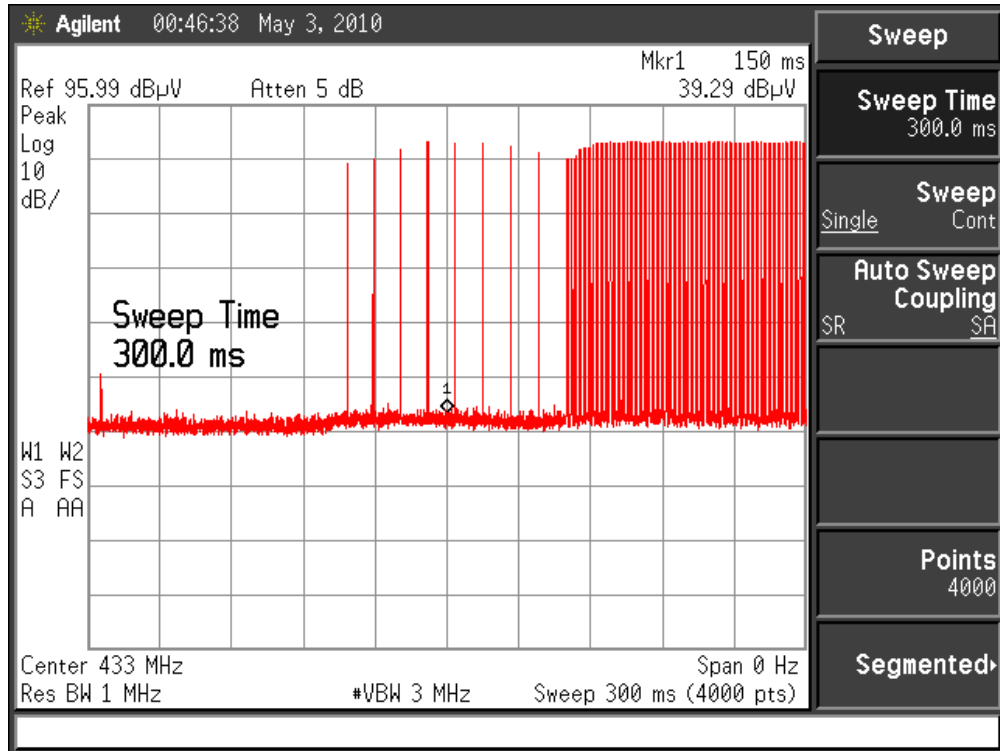
401.0	Banned	would not train	Pass	
402.0	Banned	would not train	Pass	
403.0	Banned	would not train	Pass	
404.0	Banned	would not train	Pass	
405.0	Banned	would not train	Pass	
406.0	Banned	would not train	Pass	
407.0	Banned	would not train	Pass	
408.0	Banned	would not train	Pass	
409.0	Banned	would not train	Pass	
410.0	Banned	would not train	Pass	
410.5	Allowed	would not train	Pass	While this is a valid frequency, HomeLink guardbands this region to ensure it doesn't train to 410 MHz
411.0	Allowed	trained	Pass	Normally HomeLink guardbands at 411 MHz to ensure it doesn't train at 410 MHz. In this instance, HomeLink thought the signal was 411.1 MHz, and therefore trained. HomeLink transmits the trained signal at 411.1 MHz, which still complies with our FCC submission.
411.5	Allowed	trained	Pass	
412.0	Allowed	trained	Pass	
449.0	Allowed	trained	Pass	
450.0	Allowed	trained	Pass	
450.5	Allowed	would not train	Pass	
451.0	Allowed	would not train	Pass	
452.0	Allowed	would not train	Pass	

## 7.8 Verification of De-activation after 5 seconds

This device stops transmitting once the activation button is released.

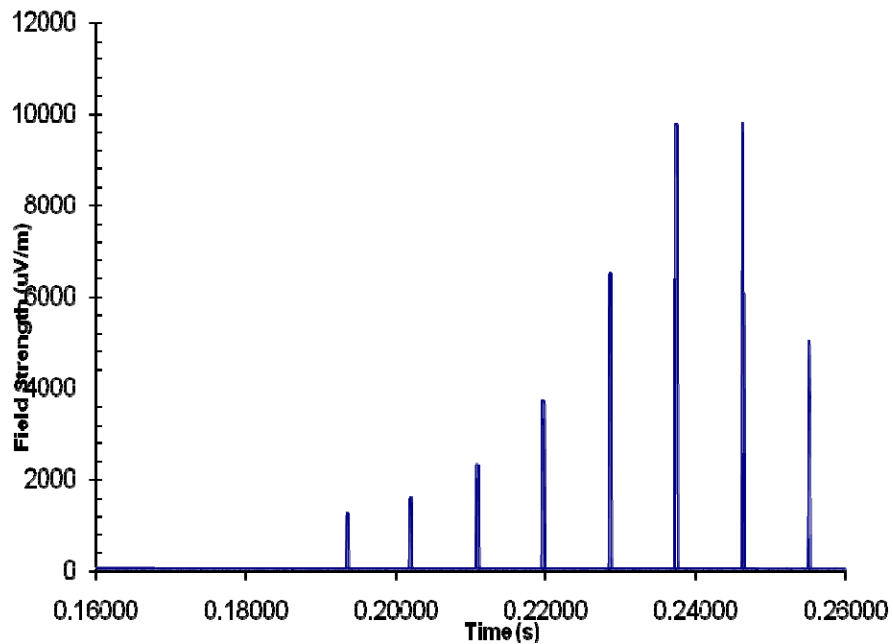
### 7.8.4 Tuning Pulse Measurements

This device uses pulses to tune the antenna prior to transmission. Measurements of these tuning pulses over 100 msec windows show that these pulses are below the FCC limits for operation in this band. A summary of measurements is presented in section 7.4.8.4. Tuning pulse measurements were taken at 288, 310, and 433 MHz at a duty cycle of 30%. Settings in the screen capture below were not used to make the measurements presented in section 7.4.8.4.



#### 7.8.4.1 Tuning Pulse (288MHz)

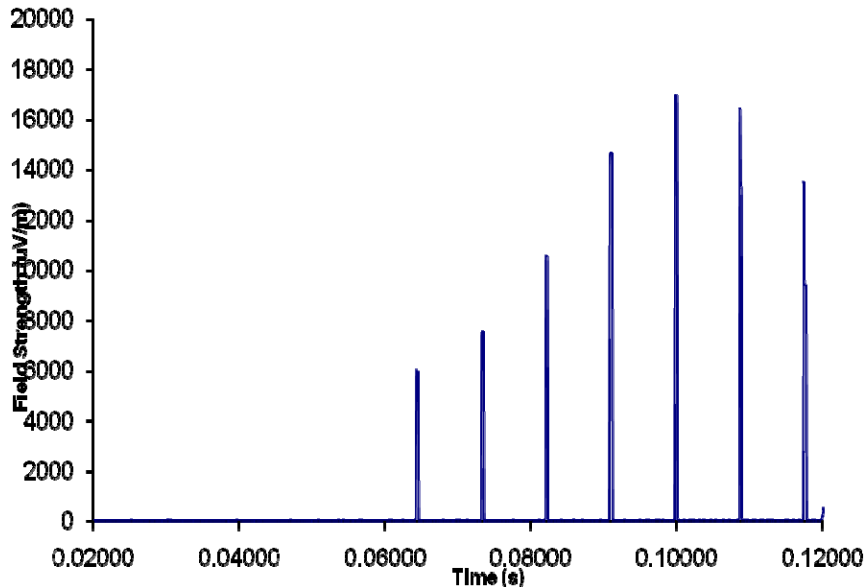
288 MHz, 30% Duty Cycle Tuning Pulse



#### 7.8.4.2 Tuning Pulse (310MHz)

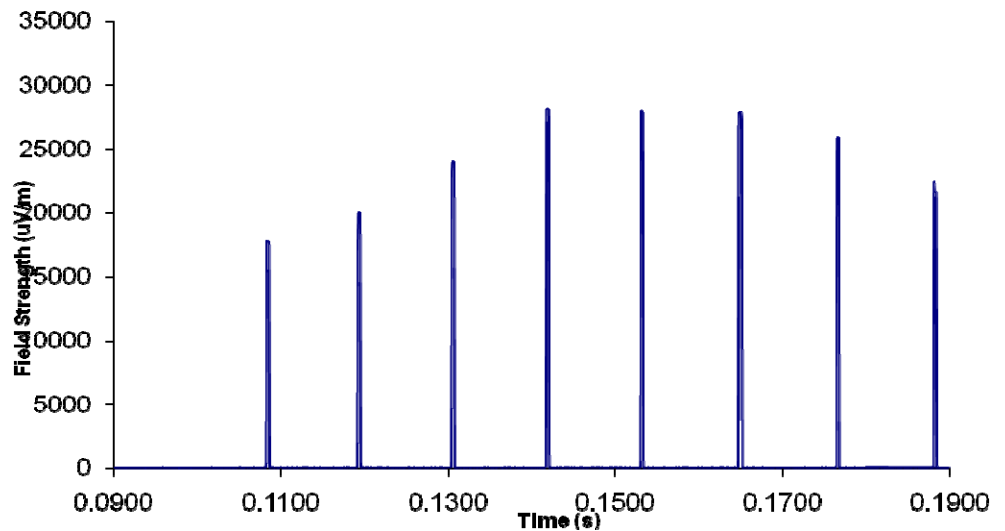


310 MHz, 30 % Duty Cycle Tuning Pulse



7.8.4.3 Tuning Pulse (433 MHz)

433 MHz, 30 % Duty Cycle Tuning Pulse  
(100 msec window)



#### 7.8.4.4 Summary of Tuning Pulse Measurements

Measurement Settings:

Resolution Bandwidth : 1MHz  
Video Bandwidth : 3 MHz  
Sweep Time : 300 msec.

For this measurement 4000 points were recorded and the values averaged over 100 msec. windows that captured the tuning pulse.

Frequency (MHz)	Average (uV/m)	Limit (uV/m)	Margin (dB)
288	169	4915	29.3
310	332	5831	24.9
433	758	10958	<b>23.2</b>

## 7.9 Formulas and Sample Calculations

### 7.5.1 Adjustment to account for duty cycle

The spectrum analyzers used for making the measurements in this report automatically corrects for cable correction and antenna factors using values stored in memory taken from the most recent calibration (in the case of antenna factors) and periodic cable loss measurements.

Formula 1:  $FS(dBuV/m) = M(dBuV) + AF(dB/m) + CF(dB)$

The presented field strength is computed by the spectrum analyzer by taking the measured level and adding to it the antenna factor and cable loss corrections. The measurement presented in gathered using the spectrum analyzer's peak-hold capability.

Formula 2:  $Average\ Level(dBuV/m) = Peak\ Level\ (dBuV/m) + duty\ cycle\ factor(dB).$

The peak measurement is adjusted to an average level by a duty cycle described below.

The duty cycle factor to apply is determined for the duty cycles of 30%, 50%, and 80% as follows:

For 30% (0.30):  $duty\ cycle\ factor(dB) = 20 * \text{Log}(0.3) = -10.46$   
For 50% (0.50):  $duty\ cycle\ factor(dB) = 20 * \text{Log}(0.5) = -6.02$   
For 80% (0.80):  $duty\ cycle\ factor(dB) = 20 * \text{Log}(0.8) = -1.94$

Example calculation:

With the EUT programmed with a 30% duty cycle a measurement of 74 dBuV/m is taken (about 5000 uV/m), the adjusted level would be:

$$74 + (-10.46) = 63.54\ dBuV/m\ \text{(example)}$$

### 7.5.2 Calculation of IC Limits from Table 4, RSS-210 and 47 CFR Part 15.231.

The prescribed limit in the range of 260 MHz to 470 MHz is stated as a linear interpolation between 3750 uV/m and 12500 uV/m. The equation used to calculate the limit using this criteria is:

$$FCC\ limit = 41.67 * f - 7083.33$$

(Where 'f' is the measurement frequency in MHz.)

The limit is dBuV/m is then:

$$\text{dB limit} = 20 * \log_{10}(\text{FCC limit uV/m}) = 20 * \log_{10}(41.67 * f - 7083.33)$$

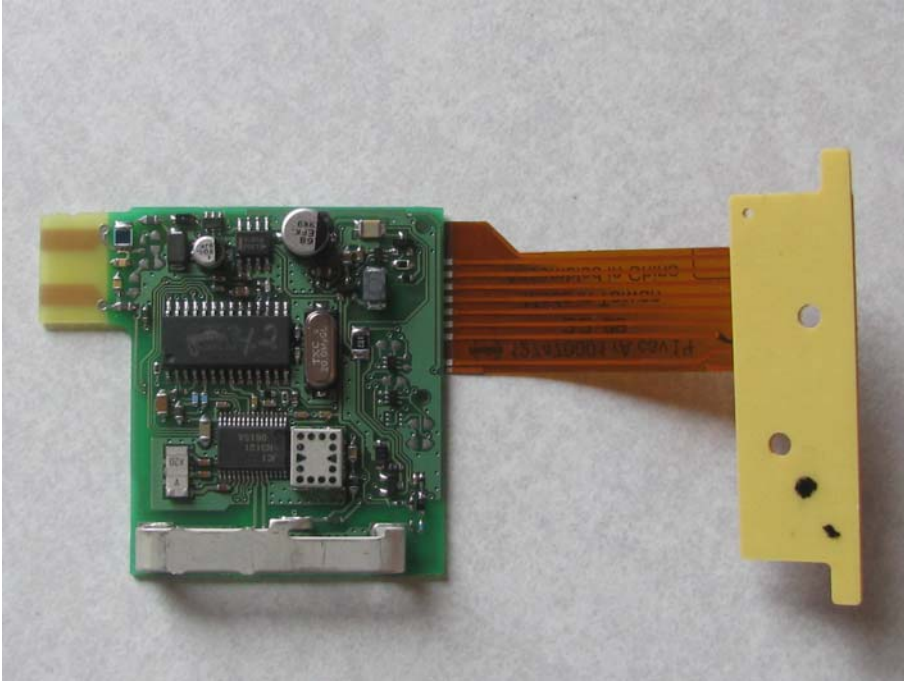
( log10 is used to indicated the use of a base 10 logarithm)

This results in the following limits for the fundamentals:

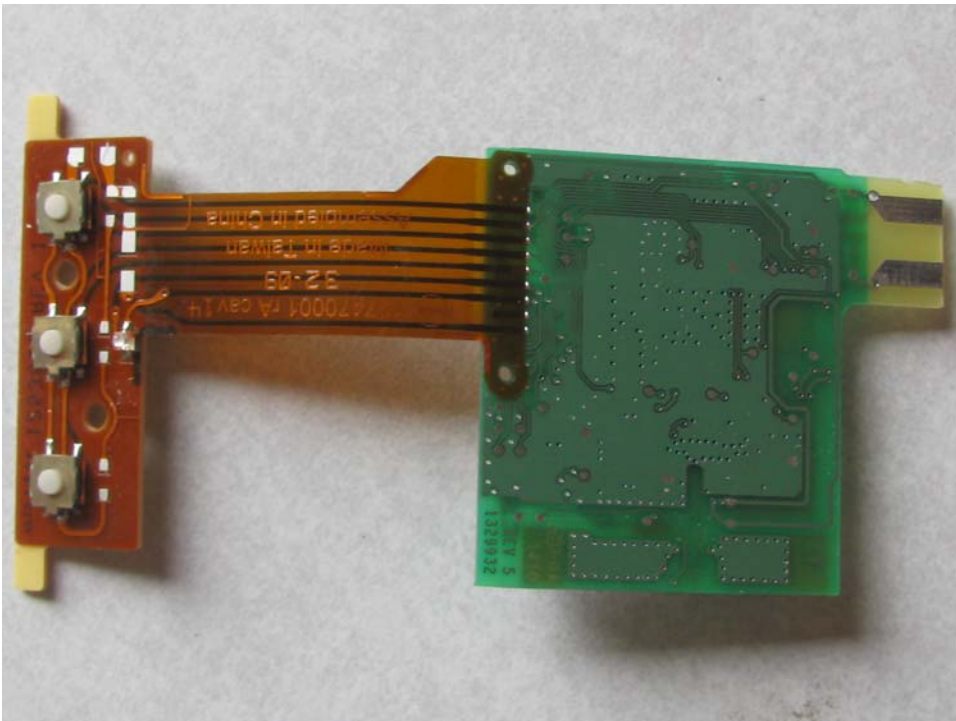
288MHz	$20 * \log_{10}(4917.6)$	= 73.8 dBuV/m
310MHz	$20 * \log_{10}(5834.4)$	= 75.3 dBuV/m
390MHz	$20 * \log_{10}(9168.0)$	= 79.2 dBuV/m
433MHz	$20 * \log_{10}(10959.8)$	= 80.8 dBuV/m

## 8 Photos of Product Tested

### 8.1.1 Front View – Printed Circuit Board



### 8.1.2 Rear View – Printed Circuit Board.



**8.1.3 Unit Disassembled**

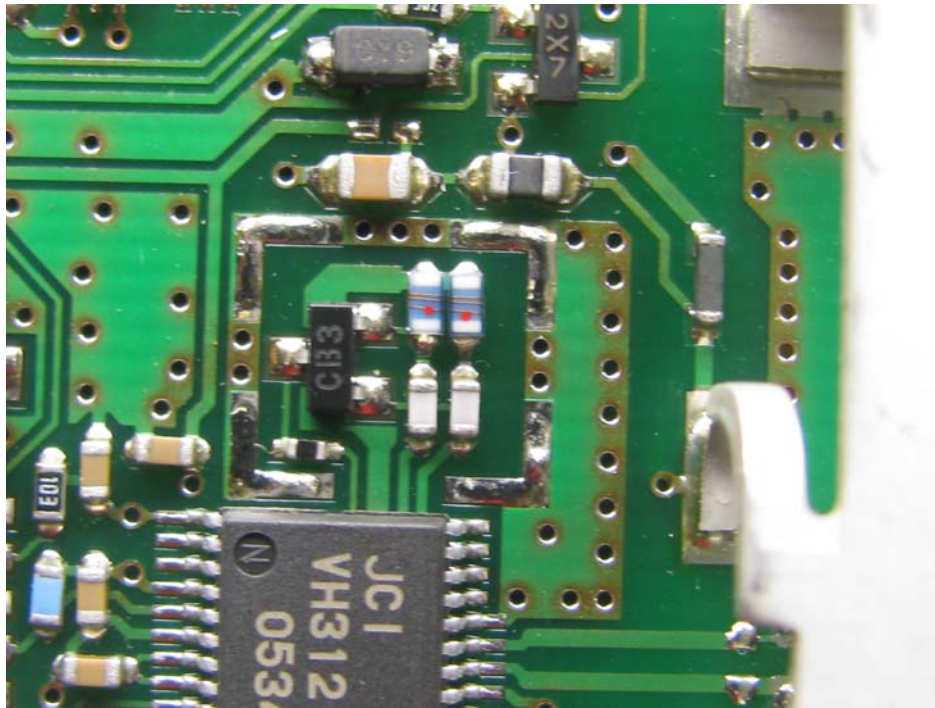
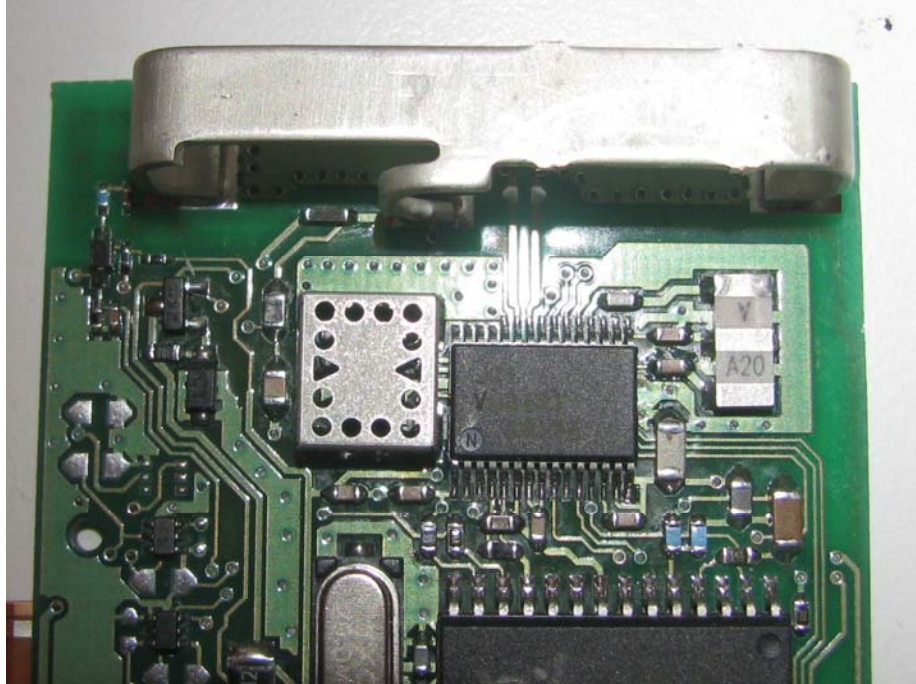


## 8.2 Housing & PCB Board Internal View



## 8.3 Close-up of Homelink RF Section.





## 9 Other Attachments and Description

### 9.1 User Manual

Please refer to attachment "User\_manual.pdf".

## **9.2 Schematics/ Tuning Information**

For schematics please refer to attachment "Schematics.pdf".

## **9.3 Emission Designation**

According to TRC-43, the emission designation for this product is 140KL1D. Where "140K" is the highest measured occupied bandwidth, "L" indicates the device uses pulse width modulation, "1" indicates the modulation as being single channel, digital information and "D" indicates that data is being transmitted

## **9.4 Theory of Operation**

Please refer to attachment "Theory\_of\_operation"

## **9.5 Label Drawing and Location on Complete Assembly.**

For a drawing of the label, refer to attachment "LABEL Drawing\_Label\_Location."

For a drawing of the position of the label on the finished assembly refer to "LABEL Drawing\_Label\_Location".