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ELECTROMAGNETIC EMISSION COMPLIANCE REPORT

of

EOLIS MODEL: WIREFREE 3D FCC ID: DWNEWF3D

October 9, 2007

| This report concerns (check one): Original grantx _ Class II change Equipment type: Low Power Intentional Radiator | | | | | |
|---|---|--|--|--|--|
| Deferred grant requested per 47 CF 0.457(d)(1)(ii)? yes nox [date] If yes, defer until: (date) Company agrees to notify the Commission by (date) of the intended date of announcement of the product so that the grant can be issued on that date. | | | | | |
| Transition Rules Request per 15.37? yes nox If no, assumed Part 15, Subpart B for unintentional radiators - the new 47 CFR [10-1-90 Edition] provision. | | | | | |
| Report prepared for: Report prepared by: Report number: | Somfy System, Inc. Advanced Compliance Lab 0048-070925-01 | | | | |

The test result in this report IS supported and covered by the NVLAP accreditation

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1. GENERAL INFORMATION

1.1 Verification of Compliance

EUT: EOLIS

Model: WIREFREE 3D

Applicant: SOMFY SYSTEM, INC.

Test Type: FCC Part 15C CERTIFICATION (15.231: a)

Result: PASS

Tested by: ADVANCED COMPLIANCE LABORATORY

Test Date: October 5, 2007

Report Number: 0048-070925-01

The above equipment was tested by Compliance Laboratory, Advanced Technologies, Inc. for compliance with the requirement set forth in the FCC rules and regulations Part 15 subpart C. This said equipment in the configuration described in the report, shows the maximum emission levels emanating from equipment are within the compliance requirements.

The estimated uncertainty of the test result is given as following. The method of uncertainty calculation is provided in Advanced Compliance Lab. Doc. No. 0048-01-01.

| | Prob. Dist. | Uncertainty(dB) | Uncertainty(dB) | Uncertainty(dB) |
|---------------------------------|-------------|-----------------|-----------------|-----------------|
| | | 30-1000MHz | 1-6.5GHz | Conducted |
| Combined Std. Uncertainty u_c | norm. | ±2.36 | ±2.99 | ±1.83 |

Date: October 9, 2007

Wei Li

Lab Manager

Advanced Compliance Lab

1.2 Equipment Modifications

N/A

1.3 Product Information

System Configuration

| ITEM | DESCRIPTION | FCC ID | CABLE |
|-----------------|-----------------------|----------|-------|
| Product | EOLIS WIREFREE 3D (1) | DWNEWF3D | |
| Housing | PLASTICS | | |
| Power Supply | 3V Battery | | |
| Operation Freq. | 433.42 HMz | | |
| Device Type | Periodic Operation | | _ |
| Receiver | SENSOR Receiver | DoC | |

(1) EUT submitted for grant.

1.4 Test Methodology

Radiated tests were performed according to the procedures in ANSI C63.4-2003 at an antenna to EUT distance of 3 meters.

1.5 Test Facility

The open area test site and conducted measurement facility used to collect the radiated and conducted data are located at Hillsborough, New Jersey. This site has been accepted by FCC to perform measurements under Part 15 or 18 in a letter dated May 19, 1997 (Refer to: 31040/PRV 1300F2). The NVLAP Lab code for accreditation of FCC EMC Test Method is: 200101-0.

1.6 Test Equipment

| Manufacture | Model | Serial No. | Description | Last Cal dd/mm/y y | Cal Due dd/mm/y y |
|-----------------|---------|------------|----------------------------------|--------------------------|----------------------------|
| Hewlett-Packard | HP8546A | 3625A00341 | EMI Receiver | 12/01/07 | 12/01/08 |
| EMCO | 3115 | 4945 | Double Ridge Guide Horn Antenna | 12/02/07 | 12/02/08 |
| EMCO | 3104C | 9307-4396 | 20-300MHz Biconical Antenna | 09/02/07 | 09/02/08 |
| EMCO | 3146 | 9008-2860 | 200-1000MHz Log-Periodic Antenna | 11/08/07 | 11/08/08 |

All Test Equipment Used are Calibrated Traceable to NIST Standards.

1.7 Statement for the Document Use

This report shall not be reproduced except in full, without the written approval of the laboratory. And this report must not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government.

2. PRODUCT LABELING

FCC ID: DWNEWF3D

This device complies with part 15 of the FCC Rules. Operating 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.

Figure 2.1 FCC ID Label (FCC statement will be shown in the user manual)

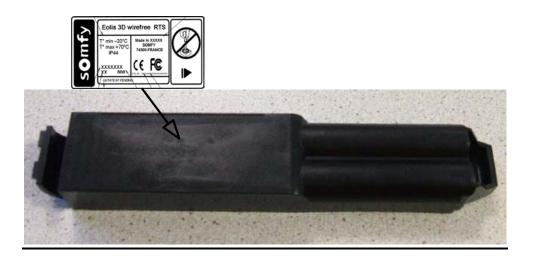


Figure 2.2 FCC ID Label Location

3. SYSTEM TEST CONFIGURATION

3.1 Justification

The system was configured for testing in a typical fashion (as a customer would normally use it). And its antenna was on PCB.

Testing was performed as EUT was operated continuously.

3.2 Special Accessories

N/A

3.3 Configuration of Tested System

Figure 3.1 to Figure 3.5 illustrate this system, which is tested standing along.



Figure 3.1 Radiated Test Setup, position 1-X



Figure 3.2 Radiated Test Setup, position 2-Y



Figure 3.3 Radiated Test Setup, position 3-Z

N/A

Figure 3.4 Conducted Setup- Front

N/A

Figure 3.5 Conducted Setup- Rear

4. SYSTEM SCHEMATICS

See Attachment.

Figure 4.1 System Schematics

5. CONDUCTED EMISSION DATA

5.1 Test Methods and Conditions

The EUT was under normal operational mode during the conducted emission test. EMI Receiver was scanned from 150KHz to 30MHz with maximum hold mode for maximum emission. Recorded data was sent to the plotter to generate output in linear format. At the input of the spectrum analyzer, a HP transient limiter is inserted for protective purpose. This limiter has a 10 dB attenuation in the range of 150KHZ to 30MHZ. That factor was automatically compensated by the receiver, so the readings are the corrected readings. The reference of the plot is the CISPR 22 Class B limit in Figure 5.1 through Figure 5.2.

| Conducted Emission Technical Requirements | | | | | |
|---|--------------------|-------------|--------------------|------------|--|
| | Cla | ss A | Class B | | |
| Frequency Range | Quasi-Peak Average | | Quasi-Peak Average | | |
| | dBuV | dBuV | DBuV | dBuV | |
| 150kHz -0.5MHz | 79 (8912uV) | 66 (1995uV) | 66-56 | 56-46 | |
| 0.5MHz-30MHz | 73 (4467uV) | 60 (1000uV) | | | |
| 0.5MHz-5MHz | | | 56 | 46 (250uV) | |
| 5MHz-30MHz | | | 60 | 50 | |

Emissions that have peak values close to the specification limit (if any) are also measured in the quasi-peak mode to determine compliance.

5.2 Test Data

Figure 5.1-5.2 show the neutral and line conducted emissions for the standard operation.

N/A

Test Personnel:

Tester Signature: _____ Date: November 21, 2006

I down

Typed/Printed Name: Edward Lee

<u>N/A</u>

Fig. 5.1 Conducted Emission-Line

<u>N/A</u>

Fig. 5.2 Conducted Emission- Neutral

6. RADIATED EMISSION DATA

6.1 Field Strength Calculation

The corrected field strength is automatically calculated by EMI Receiver using following:

$$FS = RA + AF + CF + AG$$

where FS: Corrected Field Strength in dBµV/m

RA: Amplitude of EMI Receiver before correction in dBµV

AF: Antenna Factor in dB/m

CF: Cable Attenuation Factor in dB

AG: Built-in Preamplifier Gain in dB (Stored in receiver as part of the calibration data)

The pulse train timing plots are showed in Figure 6.2.

The provision in §15.35© of the FCC part 15, the power correction factor for the modulation is –6.01dB. See attached plot for details.

The maximum average field strength should be 0.504% of the peak field strength measured. So we use peak value minus 6.01dB as calculated maximum average field strength.

6.2 Test Methods and Conditions

The initial step in collecting radiated data is a EMI Receiver scan of the measurement range below 30MHz using peak detector and 9KHz IF bandwidth / 30KHz video bandwidth. For the range 30MHz - 1GHz, 120KHz IF bandwidth / 120KHz video bandwidth are used. Both bandwidths are 1MHz for above 1GHz measurement. Up to 10^{th} harmonics were investigated.

6.3 Test Data

The following data lists the significant emission frequencies, polarity and position, peak reading of the EMI Receiver, the FCC limit, and the difference between the peak reading and the limit. Explanation of the correction and calculation are given in section 6.1.

Test Personnel: La Amm

Typed/Printed Name: Edward Lee

Date:

October 9, 2007

Radiated Test Data @3m

| Naulateu 1 | esi Data (a) s | Ш | | | | | |
|------------|----------------|--------|----------|----------|------------|----------|------------|
| | | | | | Calculated | | |
| Frequency | Polarity | Height | Azimuth | Peak | Average | FCC | Difference |
| | [H or V], | | | Reading | Reading | 3m Limit | from limit |
| (MHz) | Position | (m) | (Degree) | (dBmV/m) | (dBmV/m | (dBmV/m) | (dB) |
| | (X, Y, Z) | | | | | | |
| 433. 42 | H, X(1) | 1.0 | 180 | 75. 1 | 69. 09 | 80.8(3) | -11. 71 |
| 866. 84 | Н, Х | 1.0 | 160 | 60.3 | 54. 29 | 60.8(4) | -6. 51 |
| 1300. 26 | Н, Х | 1.1 | 140 | 53. 5 | 47. 49 | 54.0(2) | -6. 51 |
| 1733.68 | Н, Х | 1.2 | 160 | 51. 9 | 45. 89 | 60.80 | -14. 91 |
| 2167. 10 | Н, Х | 1.3 | 180 | 47.0 | 40. 99 | 60.80 | -19. 81 |
| 433. 42 | V, X | 2.2 | 210 | 65. 4 | 59. 39 | 80.80 | -21.41 |
| 866. 84 | V, X | 1.0 | 320 | 54. 7 | 48. 69 | 60.80 | -12. 11 |
| 1300. 26 | V, X | 1.1 | 260 | 52. 0 | 45. 99 | 54. 00 | -8.01 |
| 1733.68 | V, X | 1.0 | 270 | 46. 0 | 39. 99 | 60.80 | -20.81 |
| 2167. 10 | V, X | 1.1 | 240 | 46. 6 | 40. 59 | 60.80 | -20. 21 |
| 433. 42 | Н, Ү | 1.0 | 180 | 74. 9 | 68.89 | 80. 80 | -11. 91 |
| 866. 84 | Н, Ү | 1.0 | 180 | 60. 7 | 54. 69 | 60. 80 | -6. 11 |
| 1300. 26 | Н, Ү | 1.2 | 180 | 56. 3 | 50. 29 | 54. 00 | -3.71 |
| 1733. 68 | Н, Ү | 1.2 | 160 | 54. 2 | 48. 19 | 60.80 | -12.61 |
| 2167. 10 | Н, Ү | 1.3 | 170 | 49. 7 | 43.69 | 60.80 | -17. 11 |
| 433. 42 | V, Y | 2. 1 | 220 | 65. 1 | 59. 09 | 80. 80 | -21.71 |
| 866. 84 | V, Y | 1.9 | 210 | 54. 2 | 48. 19 | 60.80 | -12.61 |
| 1300. 26 | V, Y | 1.3 | 340 | 49. 7 | 43.69 | 54. 00 | -10. 31 |
| 1733. 68 | V, Y | 1.1 | 220 | 44. 2 | 38. 19 | 60.80 | -22. 61 |
| 2167. 10 | V, Y | 1.1 | 130 | 43. 0 | 36. 99 | 60.80 | -23. 81 |
| 433. 42 | Н, Z | 1.0 | 230 | 62. 9 | 56. 89 | 80.80 | -23. 91 |
| 866. 84 | H, Z | 1.9 | 300 | 48. 3 | 42. 29 | 60.80 | -18. 51 |
| 1300. 26 | H, Z | 1.3 | 240 | 50. 0 | 43. 99 | 54. 00 | -10. 01 |
| 1733. 68 | Н, Z | 1.4 | 250 | 48. 8 | 42. 79 | 60. 80 | -18. 01 |
| 2167. 10 | Н, Z | 1.3 | 240 | 44. 5 | 38. 49 | 60. 80 | -22. 31 |
| 433. 42 | V, Z | 1. 5 | 220 | 76. 1 | 70. 09 | 80. 80 | -10. 71 |
| 866. 84 | V, Z | 1. 4 | 210 | 59. 6 | 53. 59 | 60. 80 | -7. 21 |
| 1300. 26 | V, Z | 1. 2 | 240 | 54. 8 | 48. 79 | 54. 00 | -5. 21 |
| 1733. 68 | V, Z | 1. 2 | 210 | 45. 8 | 39. 79 | 60. 80 | -21. 01 |
| 2167. 10 | V, Z | 1. 2 | 220 | 47. 9 | 41.89 | 60. 80 | -18. 91 |
| | .,2 | 1 | 1 | 1110 | 11.00 | 00.00 | 15.01 |

⁽¹⁾ See Figure 3.1, 3.2 and 3.3 for definition of position X-1, Y-2, Z-3.

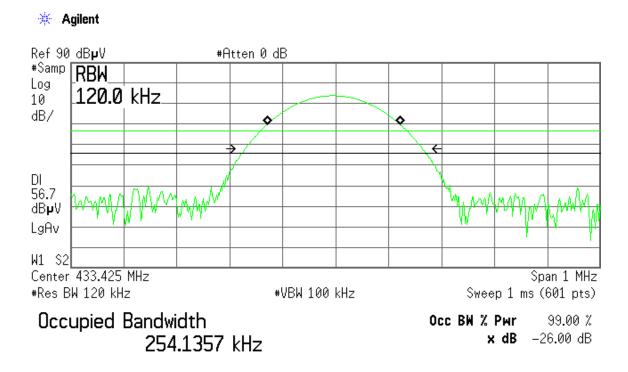
⁽²⁾ Restricted band.

⁽³⁾ Fundamental limit is 3750-12500 microvolts/meter linear interpolations (average reading). Per FCC 15.231(a).

⁽⁴⁾ Spurious limit is 375-1250~microvolts/meter linear interpolations (average reading). Per 15.231(a).

5.4 Occupied Bandwidth

The bandwidth of the emission shall be no wider than 0.25% of the center frequency, in this case, 1.084MHz(433.5x0.25%). Bandwidth is determined at the points 20dB down from the modulated carrier. Figure 5.2 shows the occupied bandwidth plot.



Transmit Freq Error -3.631 kHz x dB Bandwidth 339.505 kHz*

Figure 6.1 Occupied Bandwidth



Plot of Tx tram of EWF Sensor

The data are encoded in "Manchester code" and it's the same duty cycle for each tram. The FCC Part $15 \rightarrow \$15.35$.c.:

(c) Unless otherwise specified, e.g. Section 15.255(b), when the radiated emission limits are expressed in terms of the average value of the emission, and pulsed operation is employed, the measurement field strength shall be determined by averaging over one complete pulse train, including blanking intervals, as long as the pulse train does not exceed 0.1 seconds. As an alternative (provided the transmitter operates for longer than 0.1 seconds) or in cases where the pulse train exceeds 0.1 seconds, the measured field strength shall be determined from the average absolute voltage during a 0.1 second interval during which the field strength is at its maximum value. The exact method of calculating the average field strength shall be submitted with any application for certification or shall be retained in the measurement data file for equipment subject to notification or verification.

The tram of EWF operates for 139 ms, and in this case we use the method in red underline. The plot is the interval during which the field strength is at its maximum value: $50.04\% \rightarrow -6.01 \text{ dB}$

Figure 6.2 (a) Pulse Train Timing

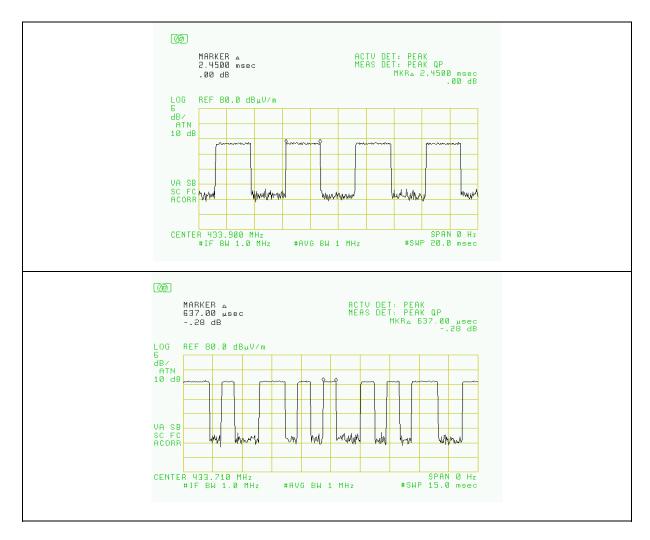


Figure 6.2 (b) Pulse Train Timing

7. PHOTOS OF TESTED EUT

The following photos show the inside details of the EUT.



Figure 7.1 Front View



Figure 7.2 Rear View



Figure 7.3 Open View

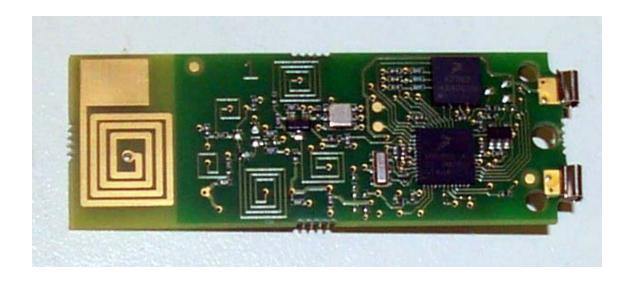




Figure 7.4 PCB Component & Foil Sides