

# REGULATORY COMPLIANCE REPORT

**TITLE:** FCC & IC Test Report for 15.247 & RSS-210 Frequency Hopping Device (80W-i)

**AUTHOR:** Roger Mulcahy

REV	CCO	DESCRIPTION OF CHANGE	DATE	APPROVALS	
001		INITIAL RELEASE		Engineering	
				Regulatory	

## REVISION HISTORY

001B		update from inputs of 09mar,25mar		Engineering	
				Engineering	
				Engineering	

### NOTICE OF PROPRIETARY INFORMATION

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**Summary**
**Test Data Summary**

**FCC 15.247 / IC RSS-210**  
**Frequency Hopping Transmitter (80W-i), 910 – 920 MHz**  
**FCC ID: EO980Wi**  
**IC: 864D-80Wi**  
**IC Model: 80Wi1**  
**Itron Model Numbers: ERW-0776-xxx**  
**Serial Numbers: 22910686, 22910688, 22911655**  
**OATS Registration Number: FCC 90716, IC864D-1**

Rule	Description	Max. Reading	Pass/Fail
Part 15.247 (a)(1)	System Receivers	Match this device	Pass
Part 15.31(e)	Variation of Input Voltage – Conducted	N/A (battery device)	N/A
Part 15.207 / RSS-Gen 7.2.2	AC Powerline Conducted Emissions	N/A (battery device)	N/A
Part 15.247(a)(1) / RSS-210 A8.1(b)	Carrier Frequency Separation – Conducted	>20 dB (200 kHz)	Pass
Part 15.247(a)(1)(i) / RSS-210 A8.1(c)	Number of Hopping Channels – Conducted	50	Pass
Part 15.247(a)(1)(i) / RSS 210 8.1 (a)	20dB Bandwidth – Conducted	165kHz	Pass
Part 15.247(b) (2) / RSS-210 A8.4(1)	Power Output – Conducted	24.07dBm 0.255Watts	Pass
Part 15.247(d) / RSS-210 A8.5	Spurious Emissions – Radiated	-56.95dBc	Pass
Parts 15.205 & 15.209 / RSS-210 2.2, 2.6 Tables 1 & 2	Restricted Bands / Spurious Emissions – Radiated	2.23 dB Margin @ 2.745GHz	Pass
Part 15.247(a)(1)(i) / RSS-210 A8.1(c)	Time of Occupancy	5.86 mS	Pass
RSS-Gen 7.2.3	Receiver Spurious Emissions	Noise floor @ 914.8MHz 25dbuV/m	Pass
Parts 1.1310 & 2.1091 / RSS-102	Limits for Maximum Permissible Exposure (MPE)	0.064mW/cm <sup>2</sup> == 0.64 W/M <sup>2</sup>	Pass
15.247 (d)	Band-edge compliance of RF Conducted Emissions	-51.11dBc	Pass

*Rule versions: FCC Part 1 (01-2006), FCC Part 2 (01-2006), FCC Part 15 (02-01-2006), RSS-102 Issue 2 (11-2005), RSS-210 Issue 7 (June 2007), RSS-Gen Issue 2 (06-2007), RSP-100 Issue 9 (06-2007).*

*Reference docs: ANSI C63.4-2003, DA 00-705 (03-30-2000), OET65 (08-1997), OET65C (06-2001), IEEE C95.3-2002.*

Cognizant Personnel	
<u>Name</u> Roger Mulcahy	<u>Title</u> Test Technician
<u>Name</u> Jay Holcomb	<u>Title</u> Regulatory Manager
<u>Name</u> Aaron Fitzgerald	<u>Title</u> Project Lead

**15.247(a)(1)****System receivers**

... .. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

**THIS DEVICE IS OPERATED IN SYSTEMS THAT THE READING DEVICES, HAVE INPUT BANDWIDTHS THAT MATCH THIS DEVICE AND THAT STAY IN SYNCHRONIZATION.**

**15.31(e)****Variation of Supply Voltage**

Vary the supply voltage from 85% to 115% of the nominal voltage. If the power level of the fundamental signal varies with supply voltage, record the voltage level at which the fundamental signal is at its highest and use that voltage level for all further testing.

**THIS DEVICE IS BATTERY OPERATED NOT CONNECTED TO THE POWER LINE. BATTER IS NOT RECHARGABLE. THERFORE THIS TEST IS N/A.**

**15.207 / RSS-210 Sec. 6.6(a)****Power line Conducted Emissions**

Measure the AC power line conducted emissions from 150kHz to 30 MHz using a 50 $\mu$ H/50 $\Omega$  line impedance stabilization network (LISN) according to the procedure specified in ANSI C63.4. Verify that no emissions exceed the following limits:

Frequency (MHz)	Quasi-Peak (dB $\mu$ V)	Average (dB $\mu$ V)
0.15-0.5	66 to 56*	56 to 46
0.5-5	56	46
5-30	60	50

\*Decreases with the logarithm of frequency

**THIS DEVICE IS BATTERY OPERATED NOT CONNECTED TO THE POWER LINE. BATTER IS NOT RECHARGABLE. THERFORE THIS TEST IS N/A.**

15.247(a) (1) / RSS-210 A8.1 (b)

**Carrier Frequency Separation**

Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

Verify that the channel separation is > the 20dB bandwidth of a single transmission.

The EUT must have its hopping function enabled. Use the following analyzer settings:

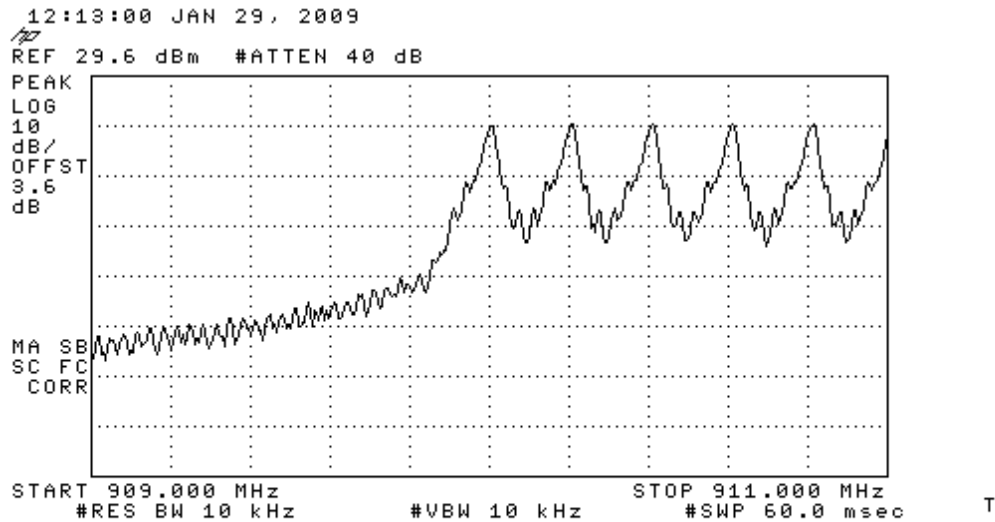
- RBW ≥ 1% of the span
- VBW ≥ RBW
- Sweep = auto
- Detector function = peak
- Trace = max hold

Allow the trace to stabilize. Use the marker-delta function to determine the separation between the peaks of the adjacent channels. The limit is specified in one of the subparagraphs of this Section. Submit this plot.

Equipment Used	Serial Number	Cal Date	Due
HP8595E	3246A00235	Mar-2008	Mar-2010

Date	Tested by
1/22/2009,1/29/2009	Roger Mulcahy

Unit tested: 22910688  
Carrier separation is 200 kHz.

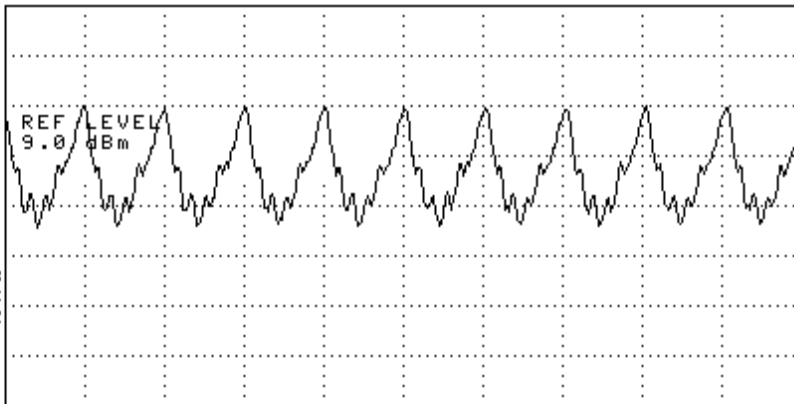


12:52:26 JAN 22, 2009

REF 9.0 dBm ATTEN 20 dB

PEAK  
LOG  
10  
dB/

MA SB  
SC FC  
CORR



START 914.000 MHz STOP 916.000 MHz  
#RES BW 10 kHz VBW 10 kHz #SWP 60.0 msec

REF LVL

ATTEN  
AUTO MAN

SCALE  
LOG LIN

PRESEL  
PEAK

PRESEL  
DEFAULT

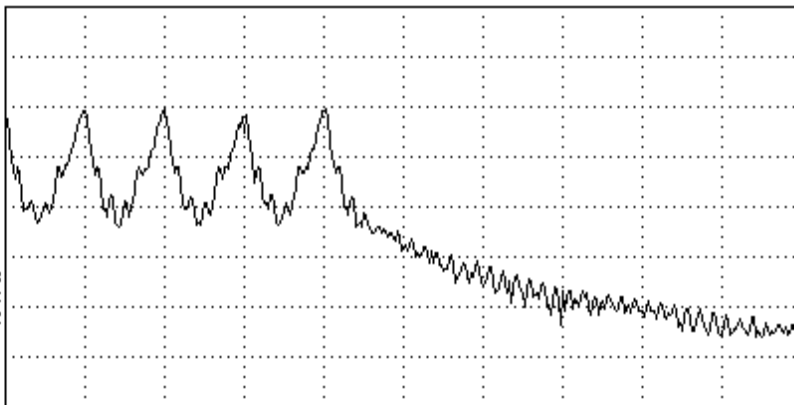
More  
1 of 3  
RL

15:04:15 JAN 22, 2009

REF 9.0 dBm ATTEN 20 dB

PEAK  
LOG  
10  
dB/

MA SB  
SC FC  
CORR



START 919.000 MHz STOP 921.000 MHz  
#RES BW 10 kHz VBW 10 kHz #SWP 60.0 msec

CLEAR  
WRITE A

MAX  
HOLD A

VIEW A

BLANK A

Trace  
A B C

More  
1 of 3  
T

**15.247(a) (1) (i) / RSS-210 A8.1 (c)**

**Number of Hopping Channels**

For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies.

The EUT must have its hopping function enabled. Use the following spectrum analyzer settings:

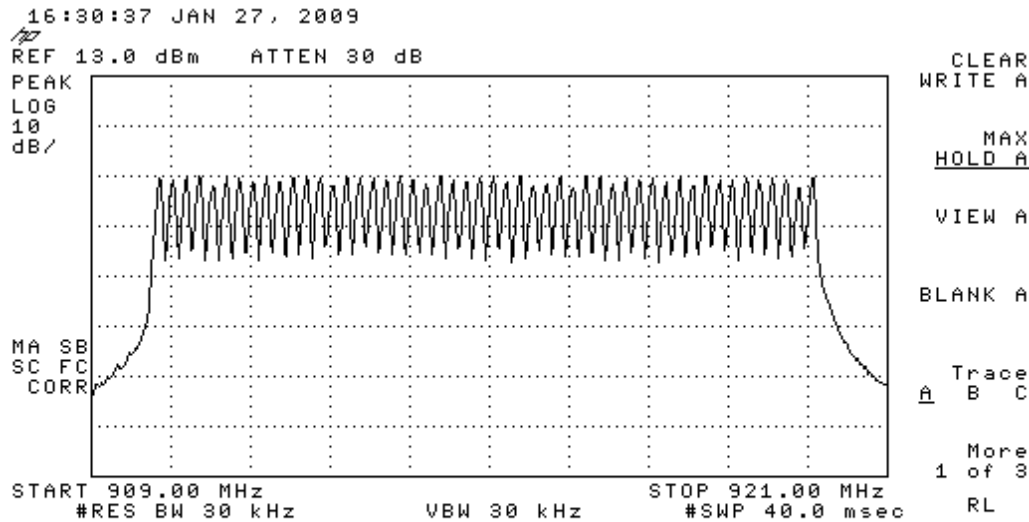
- Span = the frequency band of operation
- RBW  $\geq$  1% of the span
- VBW  $\geq$  RBW
- Sweep = auto
- Detector function = Peak
- Trace = max hold

Allow the trace to stabilize. It may prove necessary to break the span up into sections, in order to clearly show all of the hopping frequencies. The limit is specified in one of the subparagraphs of this Section. Submit this plot(s).

Equipment Used	Serial Number	Cal Date	Due
HP8595E	3246A00235	Mar-2008	Mar-2010

Date	Tested by
1/27/2009	Roger Mulcahy

Unit tested w/fresh battery: 22910688,  
There are 50 channels.



**15.247(a) (1) (i) / RSS-210 A8.1 (a)****20 dB Bandwidth**

Verify that the 20 dB bandwidth of the hopping channel is less than 250 kHz.

Use the following spectrum analyzer settings:

Span = approximately 2 to 3 times the 20 dB bandwidth, centered on a hopping channel.

RBW  $\geq$  1% of the 20 dB bandwidth

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

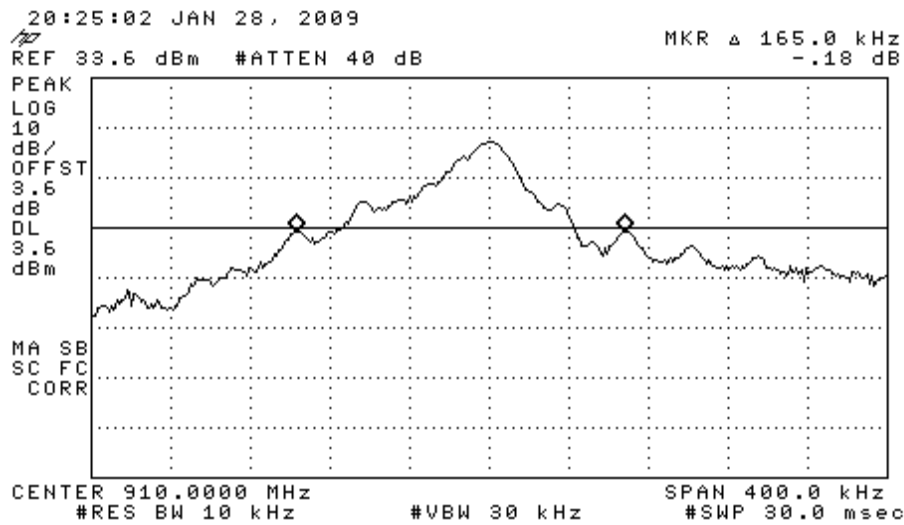
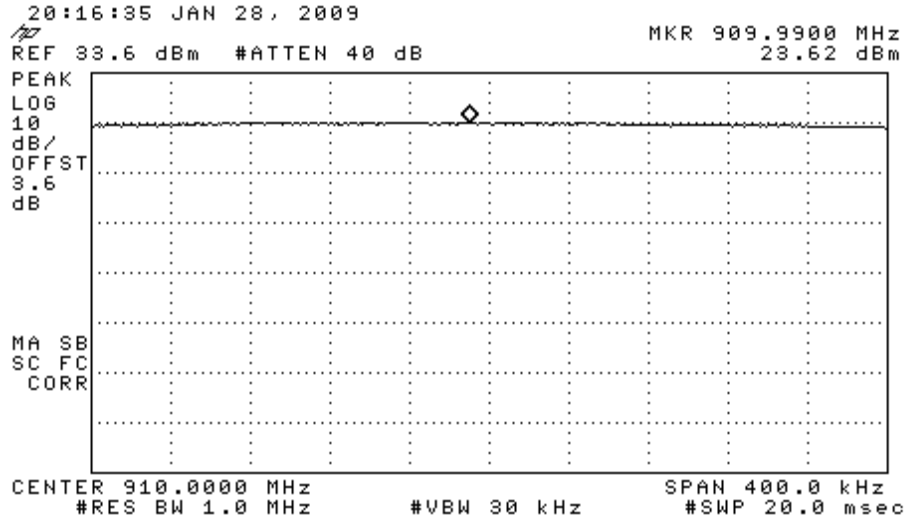
Trace = max hold

The EUT should be transmitting at its maximum data rate. Allow the trace to stabilize. Use the marker-to-peak function to set the marker to the peak of the emission. Use the marker-delta function to measure 20 dB down one side of the emission. Reset the marker-delta function, and move the marker to the other side of the mission, until it is (as close as possible to) even with the reference marker level. The marker-delta reading at this point is the 20 dB bandwidth of the emission. If this value varies with different modes of operation (e.g., data rate, modulation format, etc.), repeat this test for each variation. The limit is specified in one of the subparagraphs of this Section. Submit this plot(s).

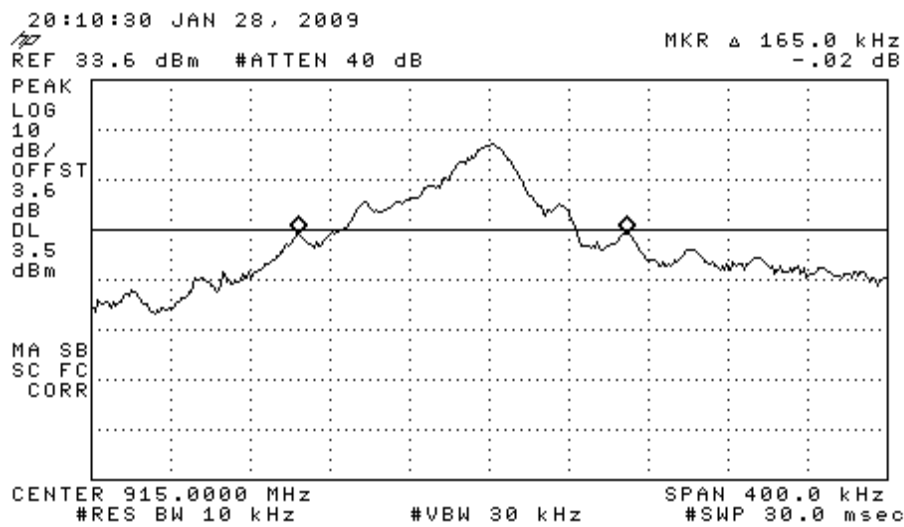
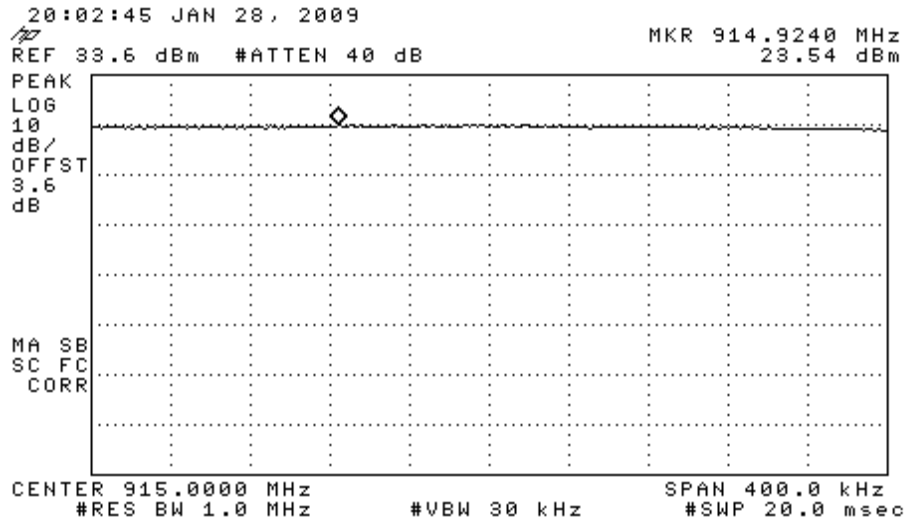
Equipment Used	Serial Number	Cal Date	Due
HP8595E	3246A00235	Mar-2008	Mar-2010
Date		Tested by	
1/28/2009		Roger Mulcahy	

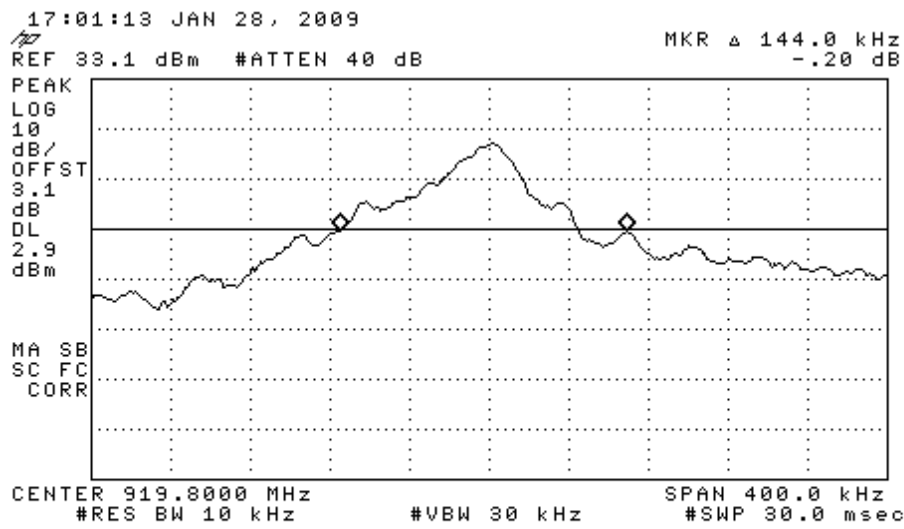
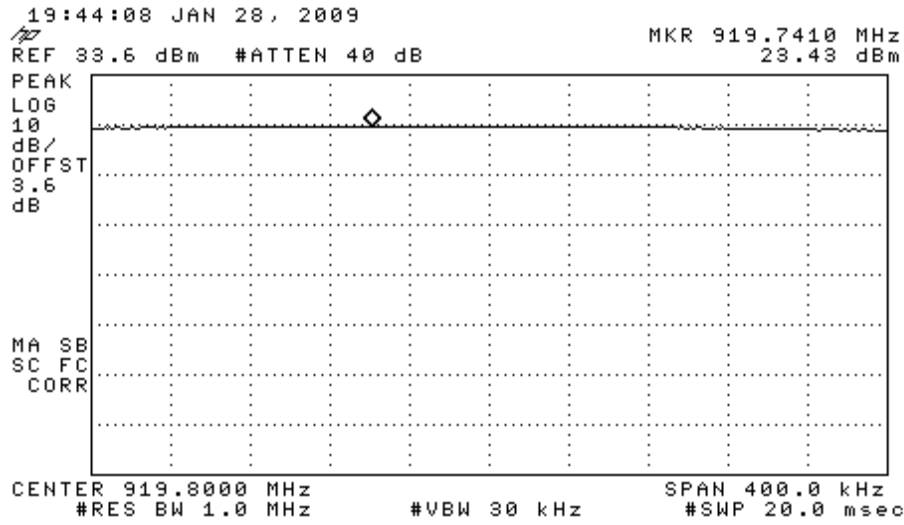
Unit tested w/fresh battery: 22910688

Frequency, MHz	total BW, kHz
910	165
915	165
919.8	144









**15.247(a) (1) (i) / RSS-210 A8.1 (c)****Time of Occupancy**

***Verify that the transmitted signal does not occupy a single frequency for more than 400 mS in a 20 second period.***

The EUT must have its hopping function enabled. Use the following spectrum analyzer settings:

Span = zero span, centered on a hopping channel

RBW = 1 MHz

VBW  $\geq$  RBW

Sweep = as necessary to capture the entire dwell time per hopping channel

Detector function = peak

Trace = max hold

If possible, use the marker-delta function to determine the dwell time. If this value varies with different modes of operation (e.g., data rate, modulation format, etc.), repeat this test for each variation. Submit this plot(s).

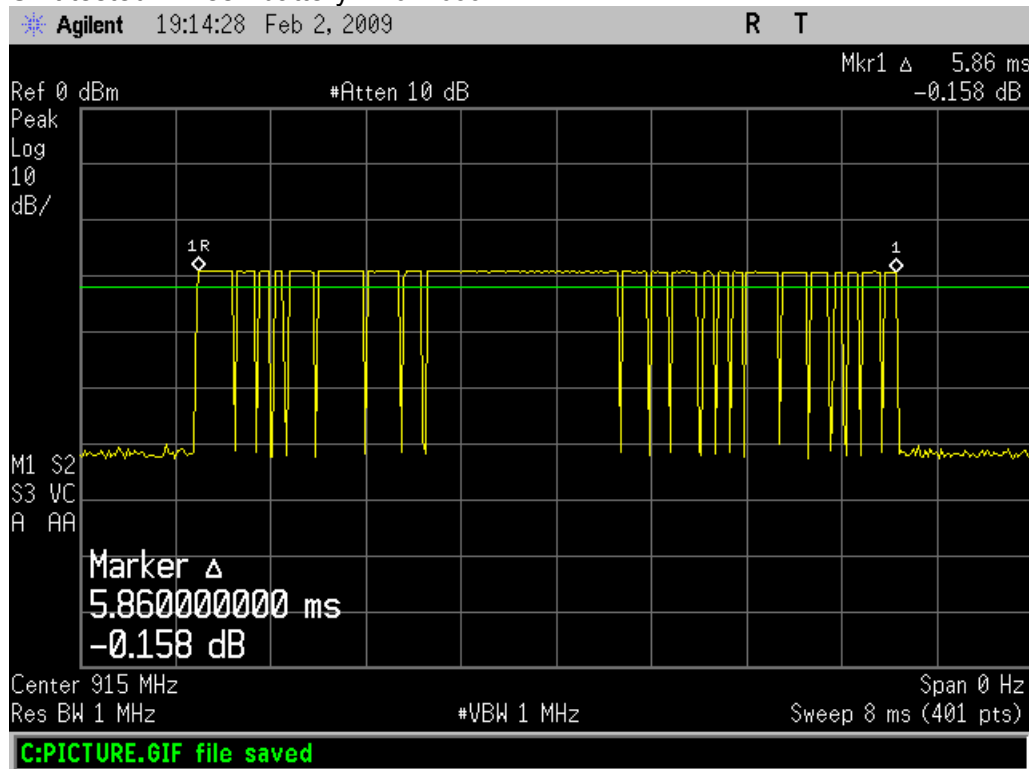
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Each transmission is 5.86 mS long. Each transmission takes place on one of 50 different channels in a pseudo-random sequence. All 50 channels are used equally on the average. The algorithm that determines the pseudo-random hop sequence does not allow the device to transmit on the same channel more than once in a 20 second period. The maximum possible occupancy time on any one frequency is 5.86 mS within a 20 second period.

Equipment Used	Serial Number	Cal Date	Due
E7405A	MY45113415	8/7/2007	8/7/2009

Date 2/02/2009	Tested by Roger Mulcahy
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Unit tested w/fresh battery: 22911655



15.247(b) (2) / RSS-210 A8.4 (1)

**Power Output**

The maximum peak conducted output power of the intentional radiator shall not exceed the following: For frequency hopping systems operating in the 902-928 MHz band: 1 watt for systems employing at least 50 hopping channels.

Use the following spectrum analyzer settings:

- Span = approximately 5 times the 20 dB bandwidth, centered on a hopping channel.
- RBW > the 20 dB bandwidth of the emission being measured.
- VBW ≥ RBW
- Sweep = auto
- Detector function = peak
- Trace = max hold
- Set RF level offset=cable loss

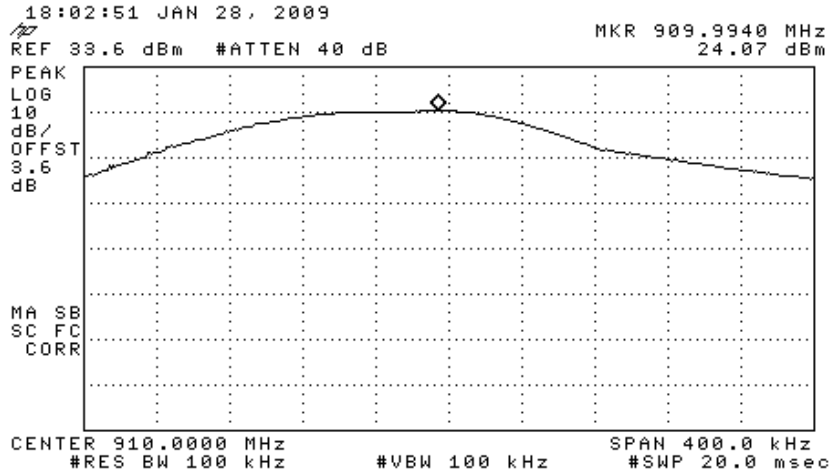
Allow the trace to stabilize. Use the marker-to-peak function to set the marker to the peak of the emission. The indicated level is the peak output power. The limit is specified in one of the subparagraphs of this Section. Submit this plot. A peak responding power meter may be used instead of a spectrum analyzer.

Equipment Used	Serial Number	Cal Date	Due
HP8595E	3246A00235	Mar-2008	Mar-2010

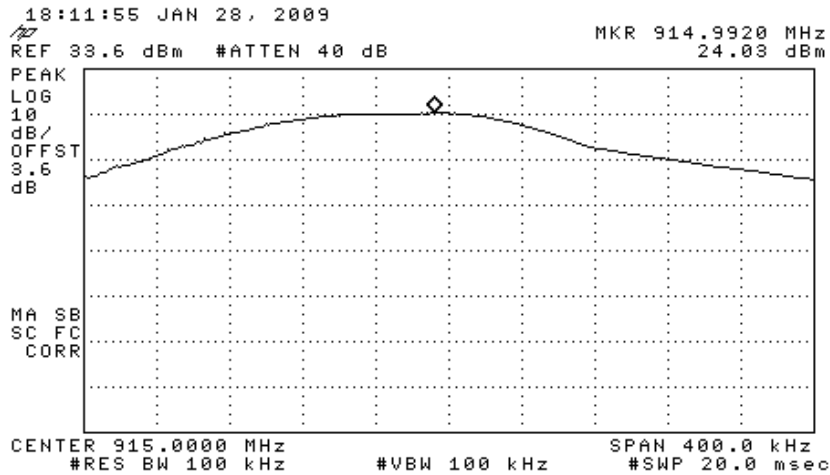
Date 1/28/2009	Tested by Roger Mulcahy
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Unit tested w/fresh battery: 22910688

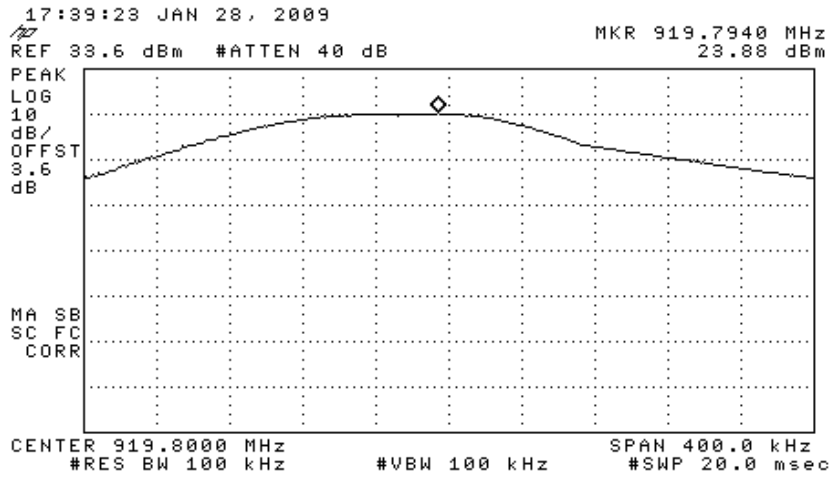
Frequency, MHz	Power out, dBm	Power out, Watts
910	24.07	0.255
915	24.03	0.253
919.8	23.88	0.244



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**15.247(d) / RSS-210 A8.5****Spurious Emissions**

*In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. Attenuation below the general limits specified in Section 15.209 is not required.*

Follow the procedure outlined in Annex A and Annex B of this document.

Equipment Used	Serial Number	Cal Date	Due
AH systems preamplifier model PAM 0126	135	12/15/2008	12/15/2009
H/S Sucoflex 40ft cable	220297001	12/03/2007	12/03/2009
Agilent E7405A Spectrum Analyzer	MY45113415	8/7/2007	8/7/2009
EMCO 6502 omni-directional Loop (9kHz to 30Mhz)	9509-2970	10/15/2008	10/15/2010
Emco 3110B Biconical (30MHz-to 300MHz)	9807-3129	10/04/2007	10/04/2009
Emco 3146 Log Periodic (200Mhz to 1GHz)	9203-3358	10/03/2007	10/03/2009
Lindgren DB-4 Dipole (400Mhz-1GHz)	78573	9/18/2008	9/18/2010
EMCO 3115 wave guide (1GHz-18GHz)	9205-3878	3/17/2008	3/17/2010
Date	Tested by	Temperature/humidity	
1/14/2009 through 1/16/2009 & 3/24-25/09	Roger Mulcahy	55° F	

Unit tested w/fresh battery: 22910686 Frequency range investigated was 9 kHz to 9.2GHz.

Freq. MHz	Ant. Pos.	Level dBm	Level dBuV	Amplifier Gain dB	Ant. Factor dB	Cable Loss dB	Corrected Level dBuV/m	emissions dBc
910	Vertical	-19.43	87.57	0	27.96	2.62	118.15	
910	Horizontal	-14.22	92.78	0	27.96	2.62	123.36	
915	Vertical	-19.81	87.19	0	28.04	2.63	117.86	
915	Horizontal	-14.13	92.87	0	28.04	2.63	123.54	
919.8	Vertical	-20.56	86.44	0	28.12	2.63	117.19	
919.8	Horizontal	-14.18	92.82	0	28.12	2.63	123.57	
6370	Vertical	-47.63	59.37	35.37	34.47	8.15	66.62	-56.95
6405	Vertical	-49.36	57.64	35.35	34.48	8.13	64.9	-58.67
6438.6	Vertical	-51.91	55.09	35.33	34.49	8.18	62.43	-61.14
6370	Horizontal	-53.32	53.68	35.37	34.47	8.15	60.93	-62.64
5490	Vertical	-52.05	54.95	35.54	34.18	7.45	61.04	-62.53
5460	Vertical	-51.64	55.36	35.52	34.11	7.46	61.41	-62.16

**15.205, 15.209 / RSS-210 2.2, 2.6****Restricted Bands & Spurious Emissions**

Only spurious emissions are permitted in any of the frequency bands listed below. The limits stated in 15.209 shall apply. Spurious emissions outside these bands shall also comply with the 15.209 limits.

Measure the field strength of all transmitter spurious emissions in the restricted bands listed below. Follow the procedure outlined in Annex A and Annex B of this document.

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
0.495-0.505 1	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2655-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36-13.41			

Equipment Used	Serial Number	Cal Date	Due
AH systems preamplifier model PAM 0126	135	12/15/2008	12/15/2009
H/S Sucoflex 40ft cable	220297001	12/03/2007	12/03/2009
Agilent E7405A Spectrum Analyzer	MY45113415	8/7/2007	8/7/2009
EMCO 6502 omni-directional Loop (9kHz to 30Mhz)	9509-2970	10/15/2008	10/15/2010
Emco 3110B Biconical (30MHz-to 300MHz)	9807-3129	10/04/2007	10/04/2009
Emco 3146 Log Periodic (200Mhz to 1GHz)	9203-3358	10/03/2007	10/03/2009
Emco 3115 wave guide (1GHz to 18GHz)	9205-3878	3/17/2008	3/17/2010

Date	Tested by	Temperature/humidity
1/14/2009 through 1/17/2009 & 3/24-25/09	Roger Mulcahy	55° F / _____



Frequency (MHz)	Field Strength (microvolts/meter)	in dBuV/m	Measurement Distance (meters)
0.009-0.490 2400F	2440F (kHz)		300
0.490-1.705 24000F	2400F (kHz)		30
1.705-30.0	30	29.5	30
30-88	100	40	3
88-216	200	43.5	3
216-960	200	46	3
Above 960	500	54	3

$$FS (dBuV) = 20 * \log (FS(uV/m))$$

Unit tested: 22910686; A Duty Cycle Correction Factor ( $20\log(\text{dwell time}/100\text{mS})$ ) was applied to show compliance to the 15.209 limit.

$$20\log\left(\frac{5.86\text{mS}}{100\text{mS}}\right) = -24.64\text{dB}$$

The maximum allowed correction factor is 20 dB.

Freq. MHz	Ant. Pos.	Level dBm	Level dBuV	Amplifier Gain dB	Ant. Factor dB	Cable Loss dB	Duty Cycle Correction dB	Corrected		
								Level dBuV/m	Limit dBuV/m	Margin dB
2730	V	-37.12	69.88	35.2	29.38	5.25	20	49.31	54	4.69
2730	H	-34.87	72.13	35.2	29.38	5.25	20	51.56	54	2.44
2745	V	-37.84	69.16	35.2	29.43	5.24	20	48.63	54	5.37
2745	H	-34.7	72.3	35.2	29.43	5.24	20	51.77	54	2.23
2759.4	V	-38.81	68.19	35.19	29.48	5.22	20	47.7	54	6.3
2759.4	H	-35.99	71.01	35.19	29.48	5.22	20	50.52	54	3.48

## RSS-Gen 7.2.3 Receiver Spurious Emission Limits

### 7.2.3.2 Radiated Measurement

All spurious emissions shall comply with the limits of Table 1.

#### Receiver Spurious Emissions

The receiver shall be operated in the normal receive mode near the mid-point of the band over which the receiver is designed to operate. Unless otherwise specified in the applicable RSS, the radiated emission measurement is the standard measurement method (with the device's antenna in place) to measure receiver spurious emissions. Radiated emission measurements are to be performed using a calibrated open-area test site. As an alternative, the conducted measurement method may be used when the antenna is detachable. In such a case, the receiver spurious signal may be measured at the antenna port. If the receiver is super-regenerative, stabilize it by coupling to it an un-modulated carrier on the receiver frequency (antenna conducted measurement) or by transmitting an un-modulated carrier on the receiver frequency from an antenna in the proximity of the receiver (radiated measurement). Taking care not to overload the receiver, vary the amplitude and frequency of the stabilizing signal to obtain the highest level of the spurious emissions from the receiver. For either method, the search for spurious emissions shall be from the lowest frequency internally generated or used in the receiver (e.g. local oscillator, intermediate or carrier frequency), or 30 MHz, whichever is the higher, to at least 3 times the highest tunable or local oscillator frequency, whichever is the higher, without exceeding 40 GHz.

#### Receiver Spurious Emission Standard

The following receiver spurious emission limits shall be complied with:

- (a) If a radiated measurement is made, all spurious emissions shall comply with the limits of Table 1. The resolution bandwidth of the spectrum analyzer shall be 100 kHz for spurious emission measurements below 1.0 GHz, and 1.0 MHz for measurements above 1.0 GHz.

**Table 1a - Spurious Emission Limits for Receivers**

Equipment Used	Serial Number	Cal Date	Due
Agilent E7405A Spectrum Analyzer	MY45113415	8/7/2007	8/7/2009
H/S Sucoflex 40ft cable	220297001	12/03/2007	12/03/2009
JCA technology JCA010-415(0.1 to 10GHz)	103	1/30/2009	1/30/2010
Emco 3110B Biconical (30MHz-to 300MHz)	9807-3129	10/04/2007	10/04/2009
Emco 3146 Log Periodic (200Mhz to 1GHz)	9203-3358	10/03/2007	10/03/2009
Emco 3115 wave guide (1GHz to 18GHz)	9205-3878	3/17/2008	3/17/2010

Date	Temp/Humidity °F / %	Tested by
2/06/2009	55° / _____ F	Roger Mulcahy

Unit tested w/fresh battery: 22911688

**Table 1b**

Spurious Frequency (MHz)	dvuV/m	Field Strength (microvolt/m at 3 meters)
30-88	40	100
88-216	43.5	150
216-960	46	200
Above 960	53.9	500

Frequency range investigated was 30MHz to 9.2 GHz. Emissions from the Receiver were below the noise floor.

freq	Level (dbm)	Level (dbuV)	antenna correction factor (db/m)	coax loss (db)	pre amplifier Gain (db)	peak level (noise floor) dbuV/m
914.8MHz	-65.94	41.06	24.76	2.62	43.44	25.00

**1.1310 & 2.1091 / RSS-102 Sec 4.2-Canada Safety Code 6; Table 5****Maximum Permissible Exposure (MPE)**

Determine the maximum power density for the general / uncontrolled population minimum separation distance of 20 cm. ( $f_{\text{MHz}} / 1500 \text{ mW/cm}^2 == f_{\text{MHz}} / 150 \text{ W/M}^2$ )

The power density is calculated as:

$$P_d = \frac{P_t \times G}{4 \times \pi \times r^2}$$

$P_d$  = power density in  $\text{mW/cm}^2$

$P_t$  = transmit power in milliwatts

$G$  = numeric antenna gain

$r$  = distance between body and transmitter in centimeters.

FCC Limits:

$$920 \text{ MHz} / 1500 = 0.6133 \text{ mW} / \text{cm}^2 @ 20\text{cm}$$

IC Limits:

$$920 \text{ MHz} / 150 = 6.133 \text{ W} / \text{M}^2 (@ 0.2\text{M})$$

Max antenna gain = 1.0 dBi == 1.26 numeric

Max TX power = 24.07 dBm == 255 mW

$$\begin{aligned} \text{results: } P_D &= (255 \times 1.26) / (4 \times \pi \times 20\text{cm}^2) = 0.064 \text{ mW} / \text{cm}^2 @ 20 \text{ cm} \\ & \quad \text{W/m}^2 = 10 \text{ times mW/cm}^2 \quad = 0.64 \text{ W/M}^2 @ 0.2 \text{ M} \end{aligned}$$

**15.247 (d)****Band-edge compliance of RF Conducted Emissions**

Use the following spectrum analyzer settings:

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

RBW  $\geq$  1% of the span

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Allow the trace to stabilize. Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge. Enable the marker-delta function, and then use the marker-to-peak function to move the marker to the peak of the in-band emission. The marker-delta value now displayed must comply with the limit specified in this Section. Submit this plot.

Now, using the same instrument settings, enable the hopping function of the EUT. Allow the trace to stabilize. Follow the same procedure listed above to determine if any spurious emissions caused by the hopping function also comply with the specified limit. Submit this plot.

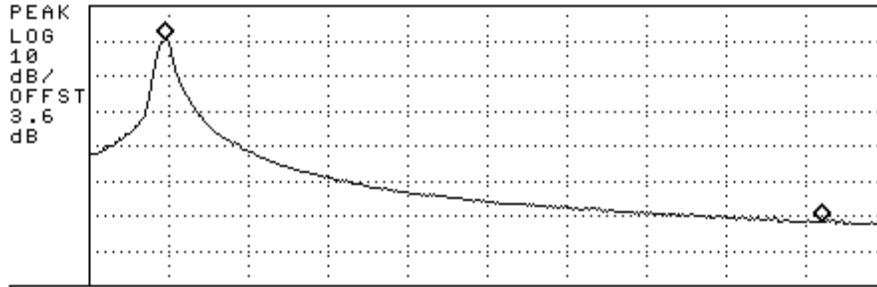
Unit tested w/fresh battery: \_\_ 22910686 \_\_

Band edge @ \_\_ 910 MHz is down -51.11 dbc

19:28:04 JAN 28, 2009

REF 33.6 dBm #ATTEN 40 dB

MKR 919.75 MHz  
23.83 dBm



Marker	Trace Type	Freq / Time	Amplitude
1:	(A) Freq	919.75 MHz	23.83 dBm
2:	(A) Freq	928.00 MHz	-28.08 dBm
3:	Inactive		
4:	Inactive		

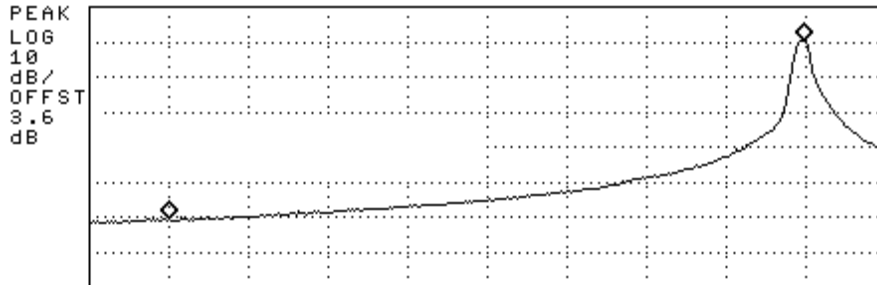
START 918.80 MHz #RES BW 100 kHz #VBW 100 kHz STOP 928.80 MHz #SWP 20.0 msec

T

18:41:23 JAN 28, 2009

REF 33.6 dBm #ATTEN 40 dB

MKR 909.97 MHz  
23.91 dBm



Marker	Trace Type	Freq / Time	Amplitude
1:	(A) Freq	909.98 MHz	23.91 dBm
2:	(A) Freq	902.00 MHz	-27.19 dBm
3:	Inactive		
4:	Inactive		

START 901.00 MHz #RES BW 100 kHz #VBW 100 kHz STOP 911.00 MHz #SWP 20.0 msec

MK TRACK ON OFF  
MK COUNT ON OFF  
MK TABLE ON OFF  
MK NOISE ON OFF  
MK PAUSE ON OFF

More 1 of 2  
T

**ANNEX A**  
**direct from FCC DA-00-705, March 30, 2000**

**Spurious RF Conducted Emissions**

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the in-band emission and all spurious emissions (e.g., harmonics) from the lowest frequency generated in the EUT up through the 10<sup>th</sup> harmonic. Typically, several plots are required to cover this entire span.

RBW = 100 kHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Allow the trace to stabilize. Set the marker on the peak of any spurious emission recorded. The level displayed must comply with the limit specified in this Section. Submit these plots.

**Spurious Radiated Emissions**

This test is required for any spurious emission or modulation product that falls in a Restricted Band, as defined in Section 15.205. It must be performed with the highest gain of each type of antenna proposed for use with the EUT. Use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 1 MHz for  $f \geq 1$  GHz, 100 kHz for  $f < 1$  GHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Follow the guidelines in ANSI C63.4-1992 with respect to maximizing the emission by rotating the EUT, measuring the emission while the EUT is situated in three orthogonal planes (if appropriate), adjusting the measurement antenna height and polarization, etc. A pre-amp and a high pass filter are required for this test, in order to provide the measuring system with sufficient sensitivity. Allow the trace to stabilize. The peak reading of the emission, after being corrected by the antenna factor, cable loss, pre-amp gain, etc., is the peak field strength, which must comply with the limit specified in Section 15.35(b). Submit this data.

Now set the VBW to 10 Hz, while maintaining all of the other instrument settings. This peak level, once corrected, must comply with the limit specified in Section 15.209. If the dwell time per channel of the hopping signal is less than 100 ms, then the reading obtained with the 10 Hz VBW may be further

adjusted by a "duty cycle correction factor", derived from  $20\log(\text{dwell time}/100 \text{ ms})$ , in an effort to demonstrate compliance with the 15.209 limit. Submit this data.

If the emission on which a radiated measurement must be made is located at the edge of the authorized band of operation, then the alternative "marker-delta" method, listed at the end of this document, may be employed.

### **Alternative Test Procedures**

If antenna conducted tests cannot be performed on this device, radiated tests to show compliance with the peak output power limit specified in Section 15.247(b) (2) and the spurious RF conducted emission limit specified in Section 15.247(d) are acceptable. A pre-amp, and, in the latter case, a high pass filter, are required for the following measurements.

1) Calculate the transmitter's peak power using the following equation:

$$E = \frac{\sqrt{30PG}}{d}$$

Where: E is the measured maximum fundamental field strength in V/m, utilizing a RBW  $\geq$  the 20 dB bandwidth of the emission, VBW > RBW, peak detector function. Follow the procedures in C63.4-2003 with respect to maximizing the emission.

G is the numeric gain of the transmitting antenna with reference to an isotropic radiator.

d is the distance in meters from which the field strength was measured.

P is the power in watts for which you are solving:

$$P = \frac{(E \times d)^2}{30G}$$

2) To demonstrate compliance with the spurious RF conducted emission requirement of Section 15.247(d), use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 100 kHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Measure the field strength of both the fundamental emission and all spurious emissions with these settings. Follow the procedures in C63.4-2003 with respect to maximizing the emissions. The measured field strength of all spurious emissions must be below the measured field strength of the fundamental emission by the amount specified in Section 15.247(d). Note that if the emission falls in a Restricted Band, as defined in Section 15.205, the procedure for measuring spurious radiated emissions, listed above, must be followed.

## **Marker-Delta Method**

In making radiated band-edge measurements, there can be a problem obtaining meaningful data since a measurement instrument that is tuned to a band-edge frequency may also capture some in-band signals when using the resolution bandwidth (RBW) required by measurement procedure ANSI C63.4-1992 (hereafter C63.4). In an effort to compensate for this problem, we have developed the following technique for determining band-edge compliance.

STEP 1) Perform an in-band field strength measurement of the fundamental emission using the RBW and detector function required by C63.4 and our Rules for the frequency being measured. For example, for a device operating in the 902-928 MHz band under Section 15.249, use a 120 kHz RBW with a CISPR QP detector (a peak detector with 100 kHz RBW may alternatively be used). For transmitters operating above 1 GHz, use a 1 MHz RBW, a 1 MHz VBW, and a peak detector (as required by Section 15.35). Repeat the measurement with an average detector (i.e., 1 MHz RBW with 10 Hz VBW). Note: For pulsed emissions, other factors must be included. Please contact the FCC Lab for details if the emission under investigation is pulsed. Also, please note that radiated measurements of the fundamental emission of a transmitter operating under 15.247 are not normally required, but they are necessary in connection with this procedure.

STEP 2) Choose a spectrum analyzer span that encompasses both the peak of the fundamental emission and the band-edge emission under investigation. Set the analyzer RBW to 1% of the total span (but never less than 30 kHz) with a video bandwidth equal to or greater than the RBW. Record the peak levels of the fundamental emission and the relevant band-edge emission (i.e., run several sweeps in peak hold mode). Observe the stored trace and measure the amplitude delta between the peak of the fundamental and the peak of the band-edge emission. This is not a field strength measurement; it is only a relative measurement to determine the amount by which the emission drops at the band-edge relative to the highest fundamental emission level.

STEP 3) Subtract the delta measured in step (2) from the field strengths measured in step (1). The resultant field strengths (CISPR QP, average, or peak, as appropriate) are then used to determine band-edge compliance as required by Section 15.205.

STEP 4) The above "delta" measurement technique may be used for measuring emissions that are up to two "standard" bandwidths away from the band-edge, where a "standard" bandwidth is the bandwidth specified by C63.4 for the frequency being measured. For example, for band-edge measurements in the restricted band that begins at 2483.5 MHz, C63.4 specifies a measurement bandwidth of at least 1 MHz. Therefore you may use the "delta" technique for measuring emissions up to 2 MHz removed from the band-edge. Radiated emissions that are removed by more than two "standard" bandwidths must be measured in the conventional manner.

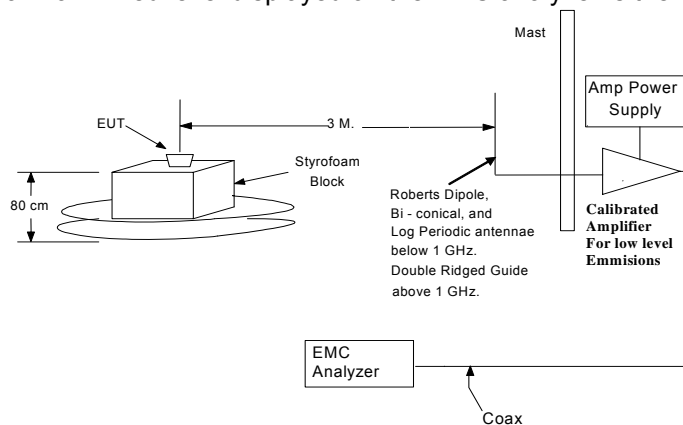


## ANNEX B

### Field Strength Measurement Procedure

This test measures the field strength of radiated emissions using a spectrum analyzer and a receiving antenna in accordance with ANSI C63.4-2003. During the test, the EUT is to be placed on a non-conducting support at 80 cm above the horizontal ground plane of the OATS. The horizontal distance between the antenna and the EUT is to be exactly 3 meters. The bandwidths used shall be; 200 Hz from 9 kHz to 150 kHz, 9 kHz from 150 kHz to 30 MHz, 120 kHz from 30 MHz to 1000 MHz, and 1 MHz from 1 GHz to 40 GHz, with the detector set to peak hold.

- 1) The antenna correction factor, preamplifier gain (if the preamplifier is installed), and cable loss are stored in tables in the EMC analyzer and the level at the analyzer is the corrected level in dbuV/m.
- 2) Monitor the frequency range of interest at a fixed antenna height and EUT azimuth.
- 3) If appropriate, manipulate the system cables to produce the highest amplitude signal relative to the limit. Note the amplitude and frequency of the suspect signal.
- 4) Rotate the EUT 360° to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, go back to the azimuth and repeat step 3). Otherwise, orient the EUT azimuth to repeat the highest amplitude observation and proceed.
- 5) Move the antenna over its fully allowed range of travel to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, return to step 3) with the antenna fixed at this height. Otherwise, move the antenna to the height that repeats the highest amplitude observation and proceed.
- 6) Change the polarity of the antenna and repeat step 3), step 4), and step 5). Compare the resulting suspected highest amplitude signal with that found for the other polarity. Select and note the higher of the two signals.
- 7) The final maximized level displayed on the EMC analyzer is the field strength.



## ANNEX C

Several of the FCC parts that are referenced.

§15.247 Operation within the bands 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz.

(a) Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

(1) Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

(i) For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 20 second period; if the 20 dB bandwidth of the hopping channel is 250 kHz or greater, the system shall use at least 25 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period. The maximum allowed 20 dB bandwidth of the hopping channel is 500 kHz.

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

**1997 FCC Decisions, Amendment of Parts 2 and 15. 7 CR 534, 12 FCC Rcd 7488, 62 FR 26239, 1997 FCC LEXIS 1927. FCC 917-114 Report and Order, Released: April 10, 1997:**

**Section 15.247(c):** Spurious emissions. The following tests are required:

(1) RF antenna conducted test: Set RBW = 100 kHz, Video bandwidth (VBW) > RBW, scan up through 10th harmonic. All harmonics/spurs must be at least 20 dB down from the highest emission level within the authorized band as measured with a 100 kHz RBW.

(2) Radiated emission test: Applies to harmonics/spurs that fall in the restricted bands listed in Section 15.205. The maximum permitted average field strength is listed in Section 15.209. A pre-amp (and possibly a high-pass filter) is necessary for this measurement. For measurements above 1 GHz, set RBW = 1 MHz, VBW = 10 Hz, Sweep: Auto. If the emission is pulsed, modify the unit for continuous operation, use the settings shown above, then correct the reading by subtracting the peak-average correction factor, derived from the appropriate duty cycle calculation. See Section 15.35(b) and (c).

**Section 15.35** Measurement detector functions and bandwidths. - The conducted and radiated emission limits shown in this part are based on the following, unless otherwise specified elsewhere in this part:

(a) ...

(b) Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz. When average radiated emission measurements are specified in this part, including average emission measurements below 1000 MHz, there also is a limit on the peak level of the radio frequency emissions. Unless otherwise specified, e.g., see §§15.250, 15.252, 15.255, and 15.509-15.519, the limit on peak radio frequency emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test. This peak limit applies to the total peak emission level radiated by the device, e.g., the total peak power level. Note that the use of a pulse desensitization correction factor may be needed to determine the total peak emission level. The instruction manual or application note for the measurement instrument should be consulted for determining pulse desensitization factors, as necessary.

(c) Unless otherwise specified, e.g. §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 Declaration of Conformity or verification.