

RF Test Report:
Starkey Laboratories
CPED

FCC ID: EOA-CPED

IC: 6903A-CPED

SC_TR_053_A

Prepared for: Starkey Laboratories

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1 Revision History

Revision	Originator	Date	Comment
Draft	C Blackham	21 Mar 2012	Issued as draft for information
A	C Blackham	10 Apr 2012	Updated and issued

2 Purpose

This report details testing performed on CPED against FCC and Industry Canada requirements.

3 Reference Documents

- [1] Title 47 CFR15 Federal Communications Commission Title 47 Code of Federal Regulations Part 15
- [2] ANSI C63.10-2009 IEEE American National Standard for Testing Unlicensed Wireless Devices Committee 63 standard 63-10 10th September 2009.
- [3] 558074 D01 DTS Meas Guidance v01 Federal Communications Commission Office of Engineering and Technology Laboratory Division Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247
- [4] RSS-GEN Issue 3 Industry Canada: General Requirements and Information for the Certification of Radio Apparatus (December 2010)
- [5] RSS-210 Issue 8 Industry Canada: Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment (December 2010)
- [6] ICES-003 Issue 4 Industry Canada Spectrum Management and Telecommunications Policy; Interference-Causing Equipment Standard; Digital Apparatus (February 2004)

4 Test Information

4.1 Client

Starkey Laboratories Inc
6600 Washington Ave. SO
Eden Prairie
MN55344
USA

4.2 Test personnel

Testing was performed by Charlie Blackham of Sulis Consultants Ltd.

4.3 Test sample

The results herein only refer to sample detailed in section 6.

5 Product Description

The equipment contains 2 transmitters:

- “900 MHz band” which is configured in North American variant to operate in the 902-928 MHz band as per 15.247. This mode can operate on a range of frequencies from 907.644 MHz to 920.993 MHz. The device operates with GMSK modulation and whilst transmission is normally TDD with a time of 6.8 ms and a frame length of 32 ms, testing will be done using 100 % duty cycle test mode.
- “2.4 GHz band” which operates in the 2400 – 2483.5 MHz band using an integrated 3rd party Bluetooth module. The following modulation rates are supported in the module: GFSK; π/4-DQPSK; 8-PSK.

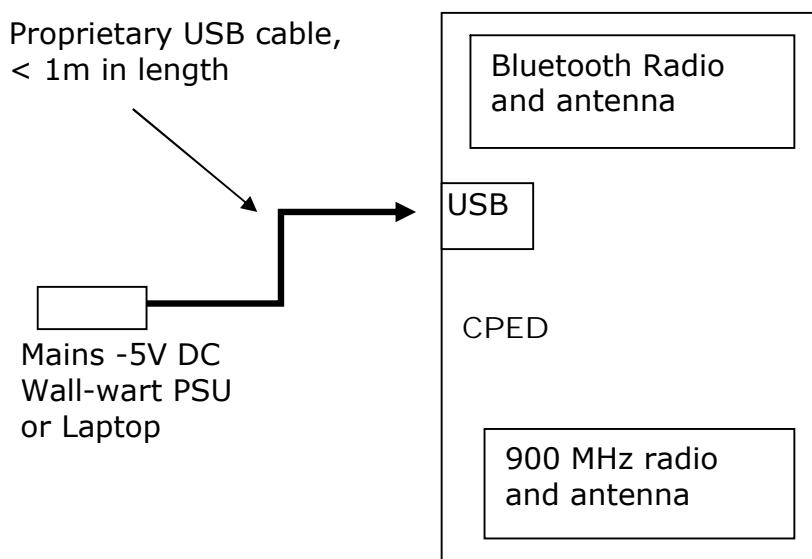


Figure 1: CPED block diagram showing radios and interfaces

Note:

The device operates on a range of frequencies from 907.644 MHz to 920.993 MHz. As the band of operation is > 10 MHz, the device will be tested on the following three channels:

Test Channel	902-928 MHz radio test frequencies	Bluetooth radio test frequencies
Bottom	907.644	2402
Middle	911.891	2441
Top	920.993	2480

Table 1: CPED Test frequencies

6 Test Configuration

6.1 Test sample and Operating mode

The equipment under test (EUT) was:

Manufacturer	Model Number	Serial Number
Starkey Laboratories Inc	CPED	N051200023

Table 2: Equipment under test

6.2 Support equipment

The support equipment was:

Description	Manufacturer	Name	Serial Number
Laptop	Fujitsu Siemens	Esprimo	YKDA651558

Table 3: Support Equipment

6.3 Test equipment

Description	Manufacturer	Model	Serial Number	Calibration certificate Calibration Due Date
Spectrum Analyser	R&S	FSP30	100219	R&S 1400-40279 08 Mar 2013
RF Cable	Murata	MXHQ87WA3000	None	Calibrated prior to test using Network Analyser
	Rosenberger	UFA210	FA210A0010003030	
Network Analyser	Agilent	N5230C	MY45001029	1-3365050900-2 09 May 2012
Network Analyser	Agilent	E8364C	MY43040492	1-3365050900-5 10 May 2012
Cal Kit used to cal Net An	HP	85052D	3101A03932	1-4124030527-1 14 Feb 2013

Table 4: Test Equipment

6.4 Equipment set-up

Equipment was configured as per figure 1:

- The CPED was connected to the laptop using a USB cable so that operating mode could be configured as required for relevant test.
- The losses for the RF cables were measured and loaded into the Spectrum Analyser as a transducer factor.

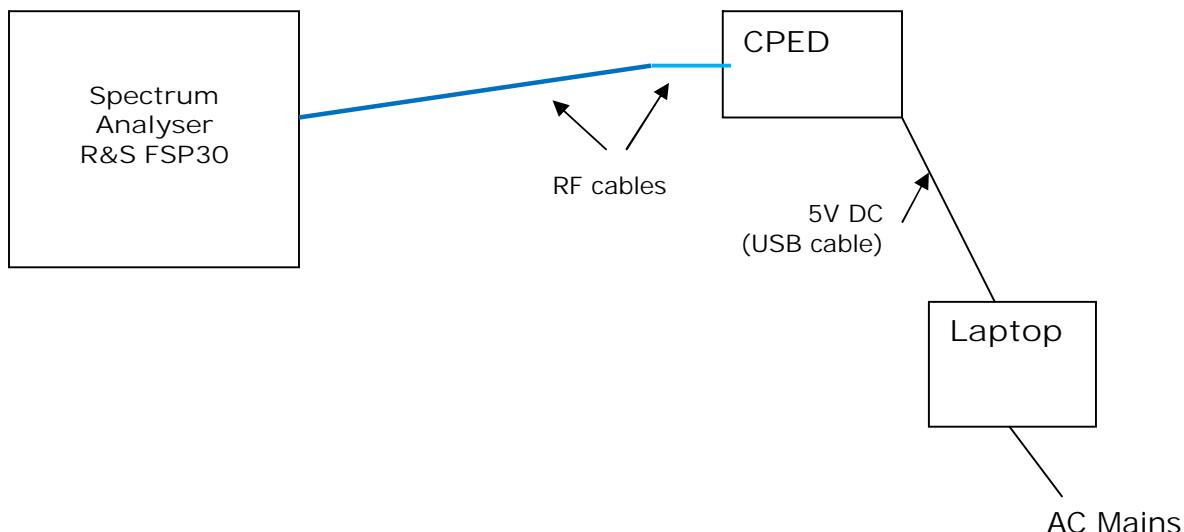


Figure 2: Test Configuration

6.5 Supported Antennas

The EUT supports operation with the following antennas:

Radio Band	Antenna type	Type	Gain
902-908 MHz	Integral	Strip line	0.8 dBi
2400-2483.5	Integral	Strip line	3.4 dBi

Table 5: EUT Antenna configurations

Note regarding Unwanted Emissions into Restricted Frequency Bands in sections 12 and 13:

- 900 MHz radio was tested against antenna gain of 2.0 dBi as per [Ref 3] KDB section 5.4.2.
- Bluetooth radio scans were made using antenna gain of 2.0 dBi, but final results are presented against limit derived using antenna gain of 3.4 dBi.

7 Summary of tests performed

7.1 902-928 MHz Radio

Test	Clause	Limit / Requirement	Result
Occupied bandwidth	FCC 15.247(a)(2)	> 500 kHz	Pass
	IC RSS-210 A8.2(a)		
Max peak conducted TX power	FCC 15.247(b)(3)	1 W	Pass
	IC RSS-210 A8.4(4)		
Power Spectral Density	FCC 15.247(e)	8dBm / 3 kHz	Pass
	IC RSS-210 A8.2(b)		
Out of Band Emissions Non-restricted bands	FCC 15.247(d)	>20dB below peak carrier /100 kHz BW	Pass
	IC RSS-210 A8.5		
Out of Band Emissions Restricted-band: Conducted	FCC 15.247(d) / 15.205(a) and 15.209(a)	15.209(a) table	Pass
	RSS GEN 7.2.5	RSS Gen table 3	
Max antenna gain	FCC 15.247(b)(4)	< 6dBi without TX power reduction	Pass

Table 6a: Summary of test results; 900 MHz radio

7.2 Bluetooth Radio

The majority of required tests for this device have already been done on the module and reported separately.

The following sections of FCC rules are covered herein:

Test	Clause	Limit / Requirement	Result
Out of Band Emissions Restricted-band: Conducted	FCC 15.247(d) / 15.205(a) and 15.209(a)	15.209(a) table	Pass
	RSS GEN 7.2.5	RSS Gen table 3	
Max antenna gain	FCC 15.247(b)(4)	< 6dBi without TX power reduction	Pass

Table 7b: Summary of test results; 2400 MHz radio

8 Occupied Bandwidth test: 902-928 MHz Radio

8.1 Measurement method

Test was conducted as per [Ref 3] section 5.1.2 using the automatic bandwidth measurement capability of the receiver, whilst using the following settings:

- Set resolution bandwidth (RBW) to be 10 kHz, which is within the 1-5 % of the emission bandwidth (EBW) required.
- Set the video bandwidth to $\geq 3 \times$ RBW
- Detector = Peak.
- Trace mode = max hold.
- Sweep = auto couple.
- Allow the trace to stabilize.
- Record measured Occupied Bandwidth

8.2 Test results

Frequency (MHz)	Occupied Bandwidth (kHz)	Requirement	Result	Plot name
907.644	650.0	> 500 kHz	Pass	OCC-low
911.891	630.0	> 500 kHz	Pass	OCC-mid
920.993	650.0	> 500 kHz	Pass	OCC-high

Table 8: Occupied Bandwidth: 902-928 MHz Radio

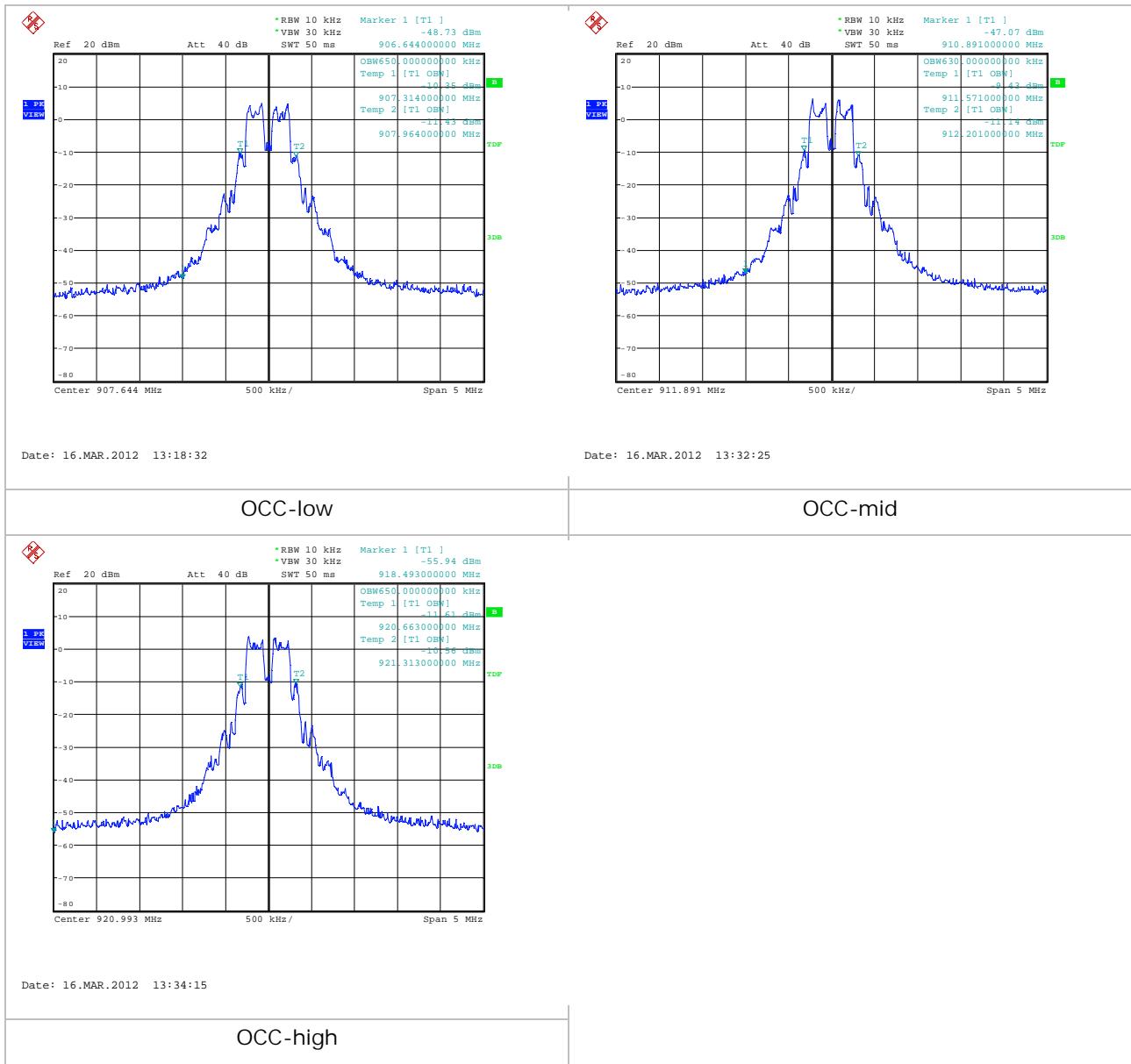


Figure 3: Occupied Bandwidth plots: 902-928 MHz Radio

9 Maximum Peak Conducted Power: 902-928 MHz Radio

9.1 Measurement method

As the EBW of the device is < 1MHz and the power is well within required limits, the test was done as a conducted peak power measurement as per [Ref 3] section 5.2.1.1:

- Set the RBW = 1 MHz (\geq EBW).
- Set the VBW = 3 MHz ($\geq 3 \times$ RBW).
- Set span = zero.
- Sweep time = auto couple.
- Detector = peak.
- Trace mode = max hold.
- Allow trace to fully stabilize.
- Use peak marker function to determine the peak amplitude level within the fundamental emission.

9.2 Test results

EUT set to transmit at maximum power on the required channel.

Frequency (MHz)	Channel Power (dBm)	Limit (dBm)	Result	Plot name
907.644	14.30	30.0	Pass	CP-low
911.891	14.98	30.0	Pass	CP-mid
920.993	13.32	30.0	Pass	CP-high

Table 9: Channel Power: 902-928 MHz Radio

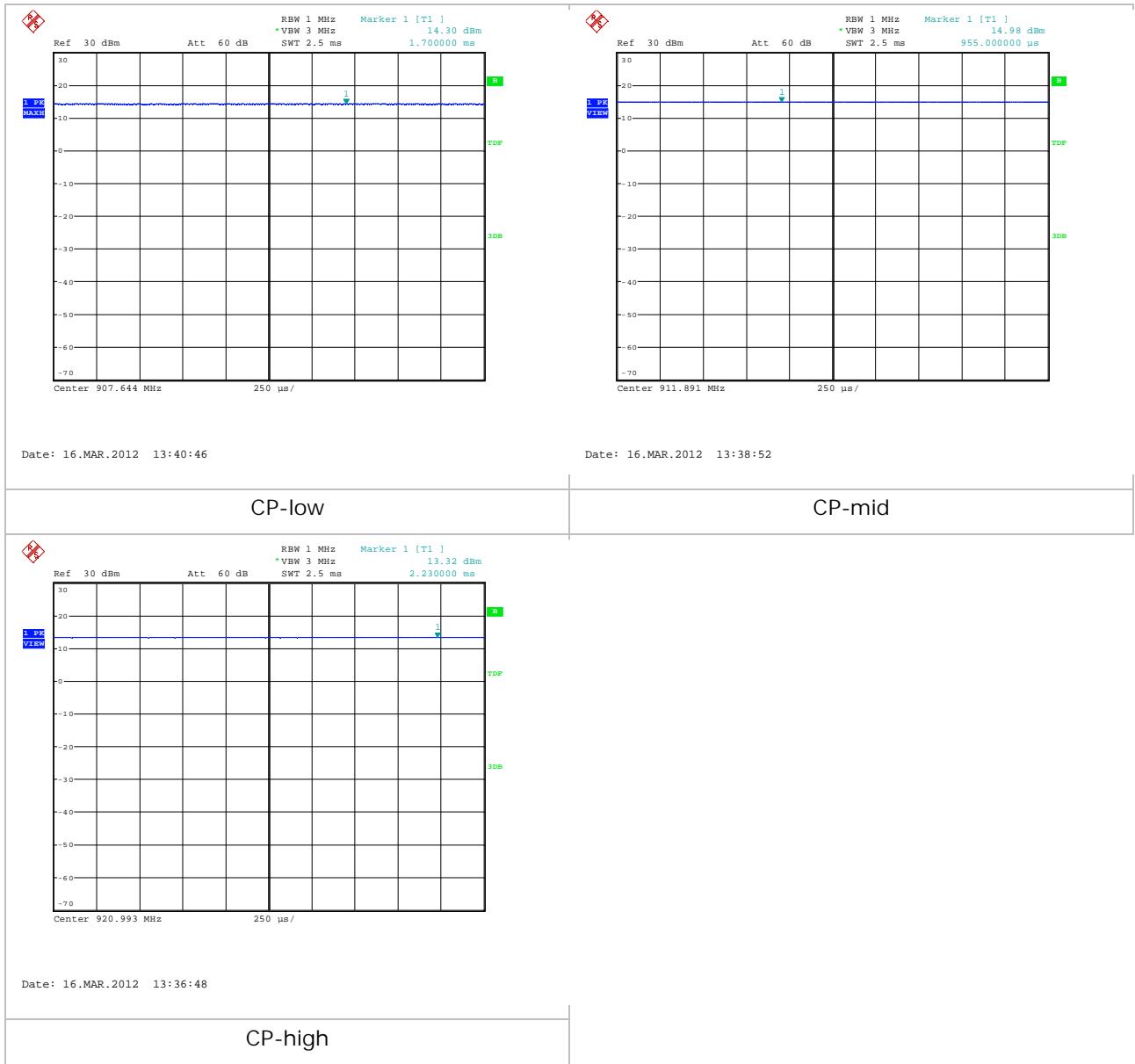


Figure 4: Channel Power plots: 902-928 MHz Radio

10 Maximum Power Spectral Density: 902-928 MHz Radio

10.1 Measurement method

Maximum Peak Conducted Power was performed using Peak Detector, so Peak Detector will be used to measure Peak Spectral Density (PSD). Test procedure as per [Ref 3] section 5.3.1:

- Set the RBW = 100 kHz.
- Set the VBW \geq 300 kHz.
- Set the span to 5-30 % greater than the EBW.
- Detector = peak.
- Sweep time = auto couple.
- Trace mode = max hold.
- Allow trace to fully stabilize.
- Use the peak marker function to determine the maximum power level in any 100 kHz band segment within the fundamental EBW.
- Scale the observed power level to an equivalent value in 3 kHz by adjusting (reducing) the measured power by a bandwidth correction factor (BWCF) where $BWCF = 10\log(3 \text{ kHz}/100 \text{ kHz}) = -15.2 \text{ dB}$.
- Compare resultant PSD value with maximum permitted value of 8dBm/3kHz.

10.2 Test results

Frequency (MHz)	Peak Marker reading (dBm)	PSD (dBm/3kHz)	Limit (dBm/3kHz)	Result	Plot name
907.644	9.35	-5.85	8.0	Pass	PSD-low
911.891	10.02	-5.18	8.0	Pass	PSD-mid
920.993	8.43	-6.77	8.0	Pass	PSD-high

Table 10: Spectral Density results: 902-928 MHz Radio

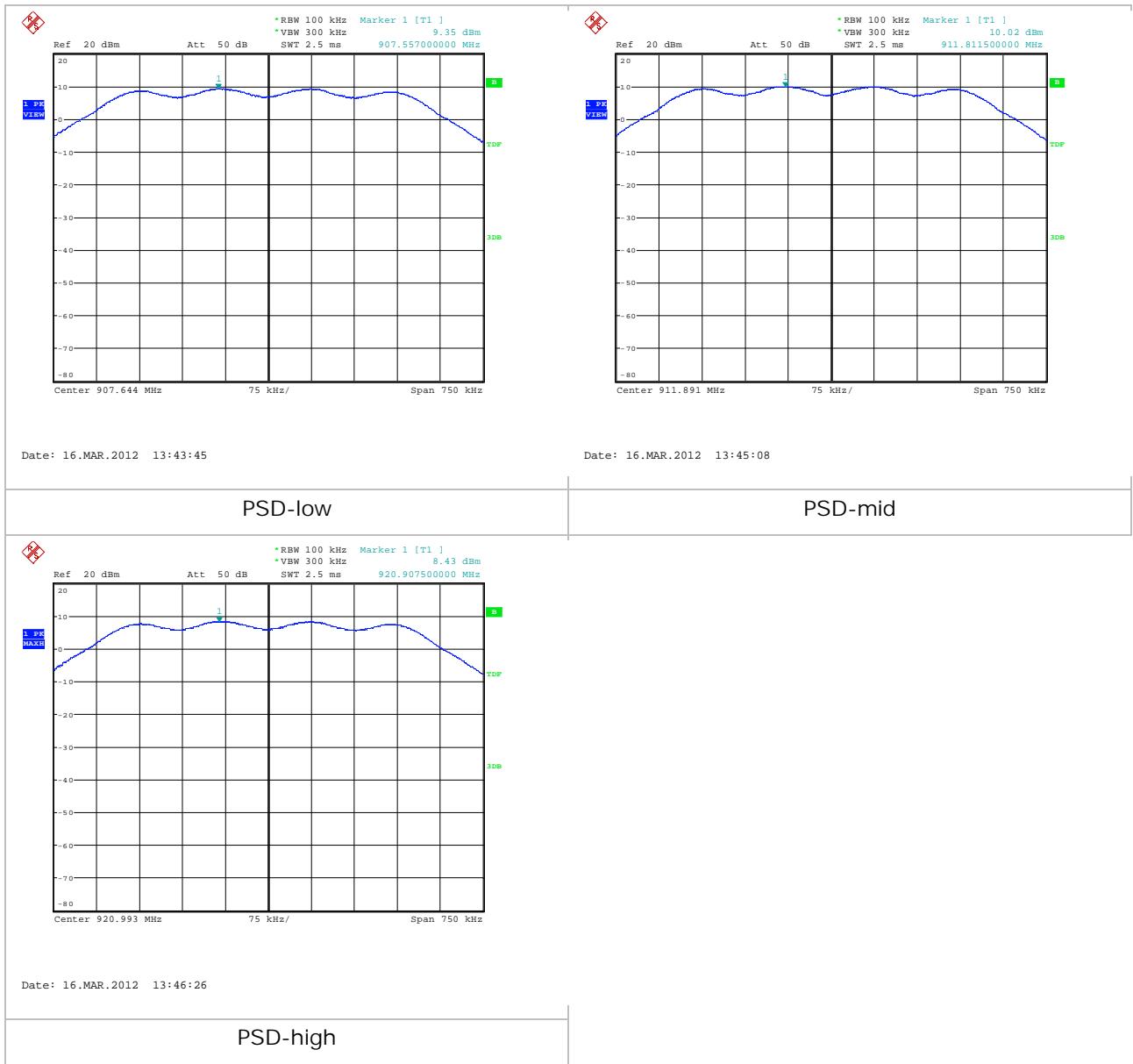


Figure 5: Spectral Density plots: 902-928 MHz Radio

11 Maximum Unwanted Emissions Levels: 902-928 MHz Radio

11.1 Measurement method

Since peak power measurements were made using a peak detector, the same detector will be used for unwanted emissions. The unwanted emissions shall be at least 20dB lower than the wanted emission.

Testing in the bands immediately adjacent to the wanted band may be done with lower than stated RBW provided the power is integrated over the required bandwidth.

First, establish a reference level by using the following procedure for measuring the peak power level in any 100 kHz bandwidth within the fundamental emission:

The measurement procedure for determining the reference level laid down in section 5.4.1.1 of KDB558074 is identical to measurement method employed in section 10, so maximum values "Peak Marker Values" obtained in section 10.0 shall be used.

The Maximum out of Band Emissions values are determined by subtracting 20dB from the values obtained in section 10 and detailed in table 9 which gives the resultant maximum permitted out-of-band emissions levels detailed in table 10:

Frequency (MHz)	Peak Marker reading	Maximum out of band emission (dBm)	Plot name
907.644	9.35	-10.65	PSD-low
911.891	10.02	-9.98	PSD-mid
920.993	8.43	-11.57	PSD-high

Table 11: Out of band emissions limits: 902-928 MHz Radio

The following limit lines shall be applied to measurements performed for all three channels

-12.0 dBm

Next, determine the power in 100 kHz band segments outside of the authorized frequency band using the following measurement:

Measurement Procedure - Unwanted Emissions

- Set RBW = 100 kHz.
- Set VBW = 300 kHz.
- Set span to encompass the spectrum to be examined.
- Detector = peak.
- Trace Mode = max hold.
- Sweep = auto couple.
- Allow the trace to stabilize (this may take some time, depending on the extent of the span).

11.2 Test results

Tests were performed on each of the three channels in turn and results are presented using Trace 1, Trace 2 and Trace 3 for channels 907.644, 911.891 and 920.993 respectively.

Test Frequency range (MHz)	Operating Frequency (MHz)	Result
30-1000	Plot: OOB_1 No emissions within 20 dB of limit	Pass
1000-1000	Plot: OOB_2 No emissions within 19 dB of limit	Pass

Table 12: Out of band emissions: 902-928 MHz Radio

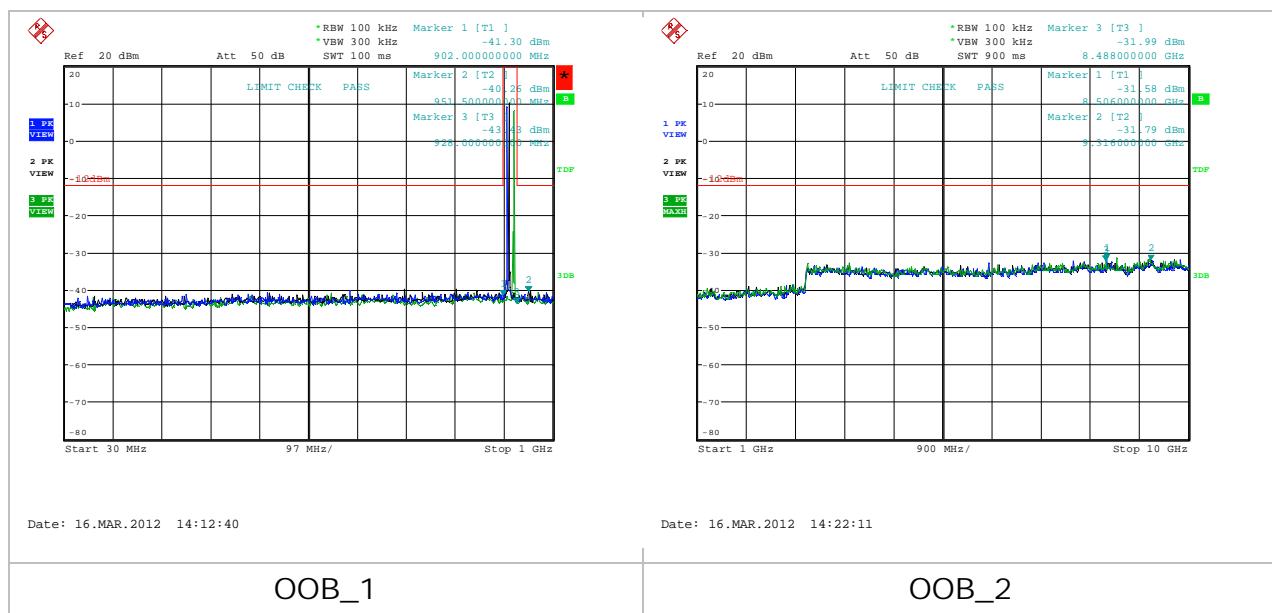


Figure 6: Out of band emissions plots: 902-928 MHz Radio

12 Maximum Emissions Restricted Band: 902-928 MHz Radio

12.1 Measurement method – conducted measurements

The radiated emissions field strength limit specified in 15.209(a) is converted to a conducted power at the antenna port as per section 5.4.2 of KDB 558074-d01.

Frequency (MHz)	Field strength ($\mu\text{V/m}$)	Measurement distance (m)	Field Strength (dB $\mu\text{V/m}$)	EIRP (dBm)	Ground plane reflection factor (dB)	Antenna port assuming 2dBi antenna
30–88	100	3	40.0	-55.3	4.7	-62.0
88–216	150	3	43.5	-51.7	4.7	-58.4
216–960	200	3	46.0	-49.2	4.7	-55.9
960–1000	500	3	54.0	-41.3	4.7	-48.0
Above 1000	500	3	54.0	-41.3	0.0	-43.3

Table 13: Out of band emissions limits: 902-928 MHz Radio

The limit line used was a combination of restricted band and “worst case”

Frequency (MHz)	Restricted Band	Limit applied	Limit at Antenna port assuming 2dBi antenna
30–88	In part	Restricted Band	-62.0
88–216	In part	Restricted Band	-58.4
216–614	In part	Restricted Band	-55.9
614–960	No	None for this test	N/A
960–1000	Yes	Restricted Band	-48.0
Above 1000	In part	Restricted Band	-43.3

30-1000 MHz

Measurements below 1 GHz were performed according to section 5.4.2.2.1 of the KDB:

- RBW = 100 kHz.
- VBW \geq 3 x RBW.
- Detector = Peak.
- Trace Mode = max hold.
- Sweep = auto coupled.
- Allow trace to stabilize.

Final measurements, if required were then performed using a QP detector:

- Span = adequate to encompass the emission of interest.
- Detector = CISPR quasi peak.
- RBW = auto couple.
- Sweep time = auto coupled

1 – 10 GHz

Measurements above 1 GHz, so the following test method was used as per section 5.4.2.2.2.1 of the KDB:

- Set the analyzer span to encompass the entire unwanted emission bandwidth.
- Set the required limit line as per above table.
- Set the RBW = 1 MHz.
- Set the VBW = 3 MHz.
- Detector = power average (RMS).
- Ensure that the number of measurement points in the sweep to $\geq 2 \times$ (span/RBW).
- Manually set the sweep time to: $\geq 10 \times$ (number of measurement points in sweep) x (transmission symbol period).
- Perform the measurement over a single sweep.
- Use the peak marker function to determine the maximum average power level in any 1 MHz of the unwanted emission.

12.2 Test results

Test Frequency range (MHz)	Operating Frequency (MHz)			Result
	907.644	911.891	920.993	
30-650	Plot: RB_1 Worst emission: -69.4 dBm at 85.8 MHz (Peak)			Pass
		Plot RB_6 -71.71dBm QP at 85.51 MHz Limit = -62.0 dBm		
960-1000	Plot: RB_2 No emission within 20dB of limit			Pass
	Trace 1	Trace 2	Trace 3	
1000-10000	No emission within 10dB of limit			Pass
	Plot: RB_3 -55.03dBm at 1.81 GHz	Plot: RB_4 -59.31dBm at 1.81 GHz	Plot: RB_5 -60.82dBm at 1.81 GHz	

Table 14: Restricted Band emissions results: 902-928 MHz Radio

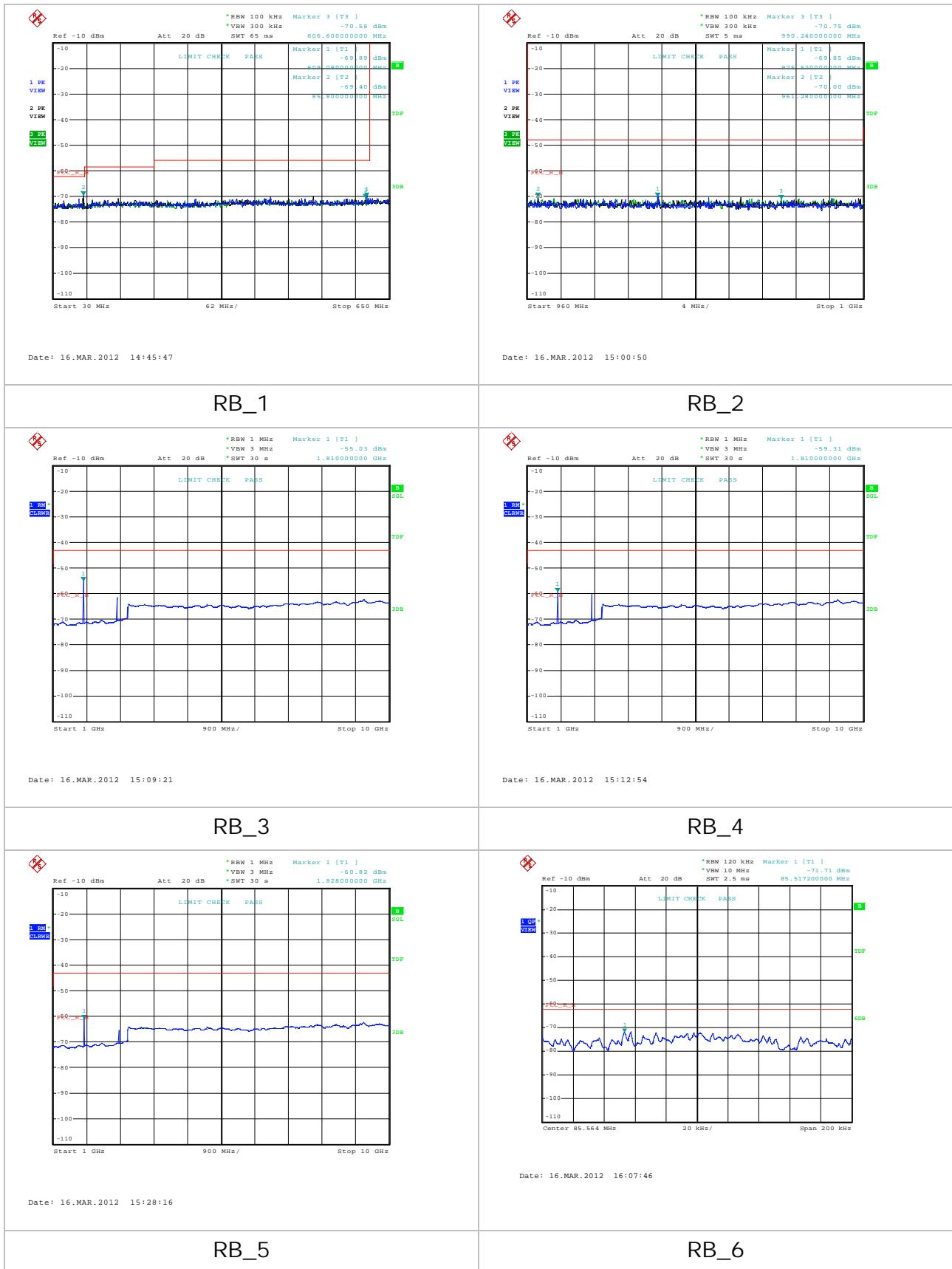


Figure 7: Restricted band emissions plots: 902-928 MHz Radio

13 Maximum Emissions Restricted Band Bluetooth Radio

13.1 Measurement method – conducted measurements

The radiated emissions field strength limit specified in 15.209(a) is converted to a conducted power at the antenna port as per section 5.4.2 of KDB 558074-d01.

Frequency (MHz)	Field strength (μ V/m)	Measurement distance (m)	Field Strength (dB μ V/m)	EIRP (dBm)	Ground plane reflection factor (dB)	Antenna port assuming 2.0 dBi antenna	Antenna port assuming 3.4 dBi antenna
30–88	100	3	40.0	-55.3	4.7	-62.0	-63.4
88–216	150	3	43.5	-51.7	4.7	-58.4	-59.8
216–960	200	3	46.0	-49.2	4.7	-55.9	-57.3
960–1000	500	3	54.0	-41.3	4.7	-48.0	-49.4
Above 1000	500	3	54.0	-41.3	0.0	-43.3	-44.7

Table 15: Out of band emissions limits: Bluetooth Radio

The limit line used was a combination of restricted band and “worst case”

Frequency (MHz)	Restricted Band	Limit applied	Graph Limit at Antenna port assuming 2dBi antenna	Tabular limit applied assuming 3.4 dBi antenna
30–88	In part	Restricted Band	-62.0	-63.4
88–216	In part	Restricted Band	-58.4	-59.8
216–614	In part	Restricted Band	-55.9	-57.3
614–960	No	None for this test	N/A	N/A
960–1000	Yes	Restricted Band	-48.0	-49.4
Above 1000	In part	Restricted Band	-43.3	-44.7

30–1000 MHz

Measurements below 1 GHz were performed according to section 5.4.2.2.1 of the KDB:

- RBW = 100 kHz.
- VBW \geq 3 x RBW.
- Detector = Peak.
- Trace Mode = max hold.
- Sweep = auto coupled.
- Allow trace to stabilize.

Final measurements, if required were then performed using a QP detector:

- Span = adequate to encompass the emission of interest.
- Detector = CISPR quasi peak.
- RBW = auto couple.
- Sweep time = auto coupled

1 – 10 GHz

Measurements above 1 GHz, so the following test method was used as per section 5.4.2.2.2.1 of the KDB:

- Set the analyzer span to encompass the entire unwanted emission bandwidth.
- Set the required limit line as per above table.
- Set the RBW = 1 MHz.
- Set the VBW = 3 MHz.
- Detector = power average (RMS).
- Ensure that the number of measurement points in the sweep to $\geq 2 \times$ (span/RBW).
- Manually set the sweep time to: $\geq 10 \times$ (number of measurement points in sweep) x (transmission symbol period).
- Perform the measurement over a single sweep.
- Use the peak marker function to determine the maximum average power level in any 1 MHz of the unwanted emission.

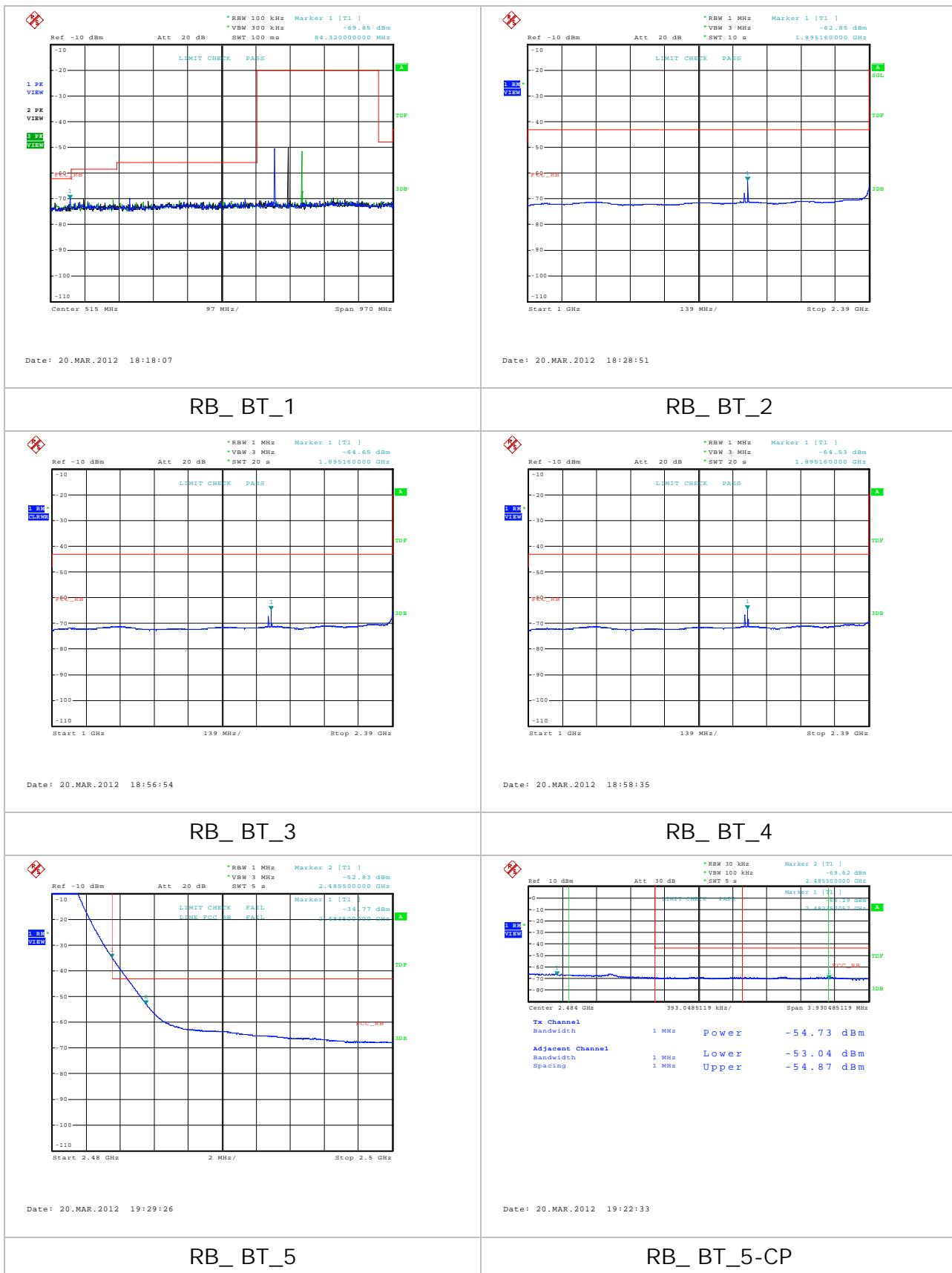
13.2 Test results - GFSK

Test Frequency range (MHz)	Operating Frequency (MHz)			Result
	2402	2441	2480	
30-1000	Plot: RB_BT_1 Worst emission: -69.85dBm at 84.32 MHz (Peak)			Pass
	Trace 1 -69.85dBm at 84.32 MHz (Peak)	Trace 2	Trace 3	
1000-2390	Plot: RB_BT_2 -62.85 dBm at 1895.16 MHz			Pass
	Plot: RB_BT_3 -63.84 dBm at 1895.16 MHz	Plot: RB_BT_4 -62.85 dBm at 1895.16 MHz		
2483.5-2500	No emissions of note	No emissions of note	Plot: RB_BT_5 -34.77 dBm at 2483.5 MHz	See table 16
2500-10000	No emission within 20dB of limit			Pass
	Plot: RB_BT_6	Plot: RB_BT_7	Plot: RB_BT_8	
10000-25000	No emission within 10dB of limit			Pass
	Plot: RB_BT_9a	Plot: RB_BT_9b	Plot: RB_BT_9c	

Table 16: Restricted Band emissions results; Bluetooth GFSK mode

Frequency Range (MHz)	Power/MHz (dBm)	Limit	Plot	Result
2483.5-2484.5	-54.73	-44.7	RB_BT_4-CP	Pass
2484.5-2485.5	-54.87	44.7		

Table 17: Restricted Band emissions- band edge; Bluetooth GFSK mode



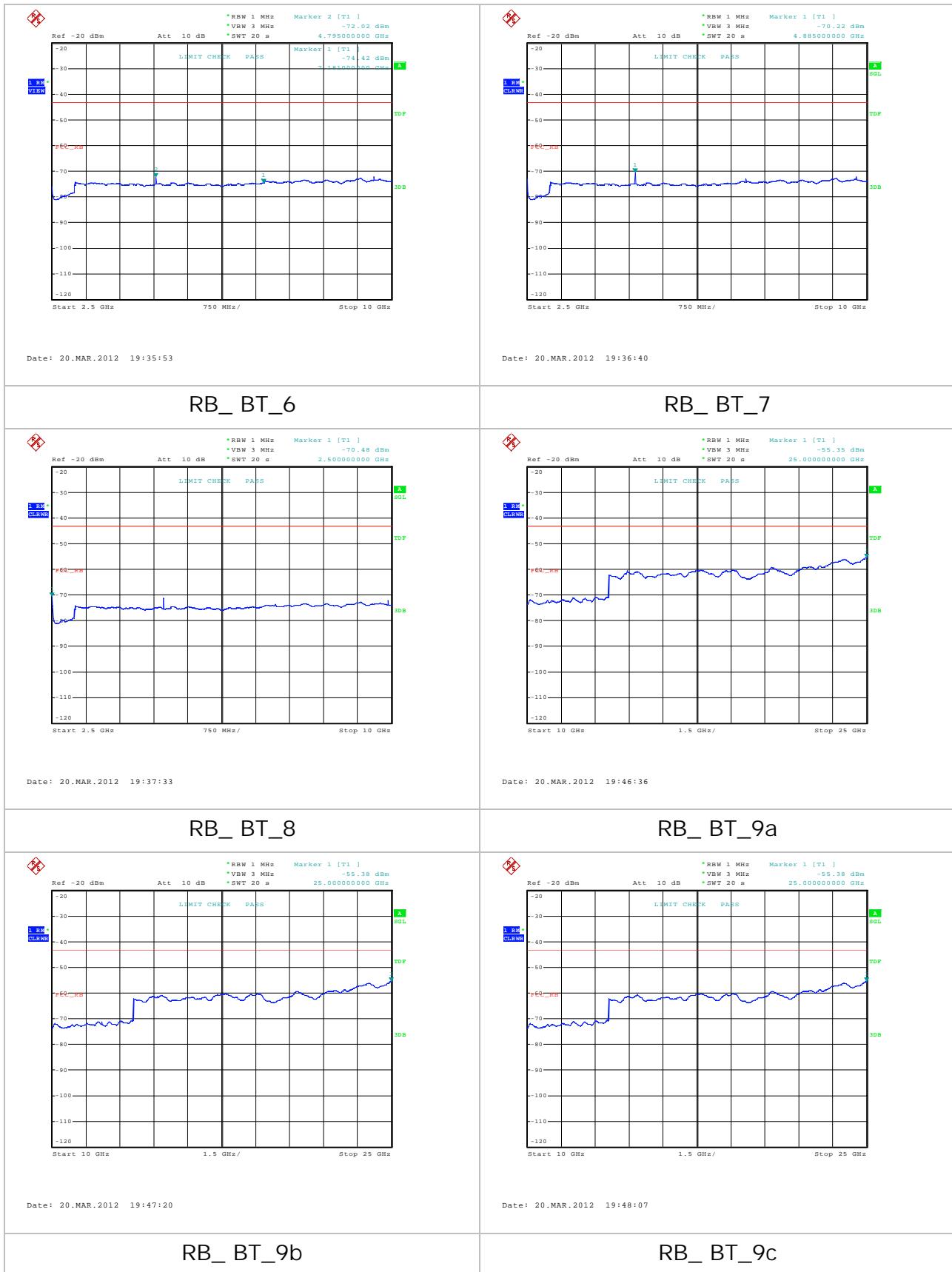


Figure 8: Restricted band emissions plots – Bluetooth GFSK mode

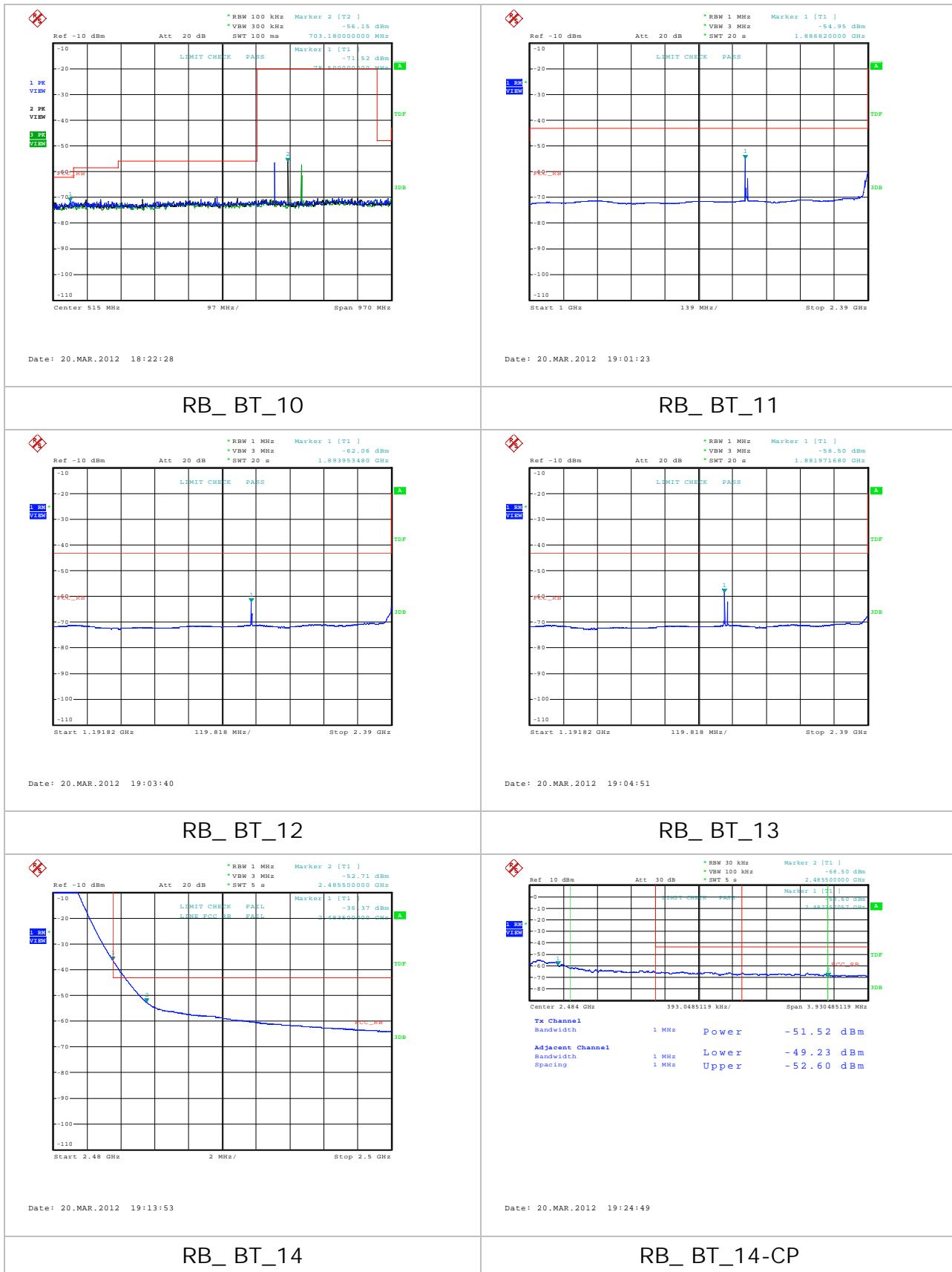
13.3 Test results – 8-DPSK

Test Frequency range (MHz)	Operating Frequency (MHz)			Result
	2402	2441	2480	
30-1000	Plot: RB_BT_10 Worst emission: -71.52dBm at 78.50 MHz (Peak)			Pass
	Trace 1	Trace 2	Trace 3	
1000-2390	Plot: RB_BT_11 -54.95 dBm at 1886.82 MHz	Plot: RB_BT_12 -62.06 dBm at 1893.95 MHz	Plot: RB_BT_13 -58.50 dBm at 1881.97 MHz	Pass
2483.5-2500	No emissions of note	No emissions of note	Plot: RB_BT_14 -36.37 dBm at 2483.5 MHz	See table 18
2500-10000	No emissions within 10dB of limit			Pass
	Plot: RB_BT_15	Plot: RB_BT_16	Plot: RB_BT_17	
10000-25000	No emissions within 10dB of limit			Pass
	Plot: RB_BT_18	Plot: RB_BT_19	Plot: RB_BT_20	

Table 18: Restricted Band emissions results; Bluetooth 8-DPSK mode

Frequency Range (MHz)	Power/MHz (dBm)	Limit	Plot	Result
2483.5-2484.5	-51.52	-44.7	RB_BT_14-CP	Pass
2484.5-2485.5	-52.60	44.7		

Table 19: Restricted Band emissions- band edge; Bluetooth 8-DPSK mode



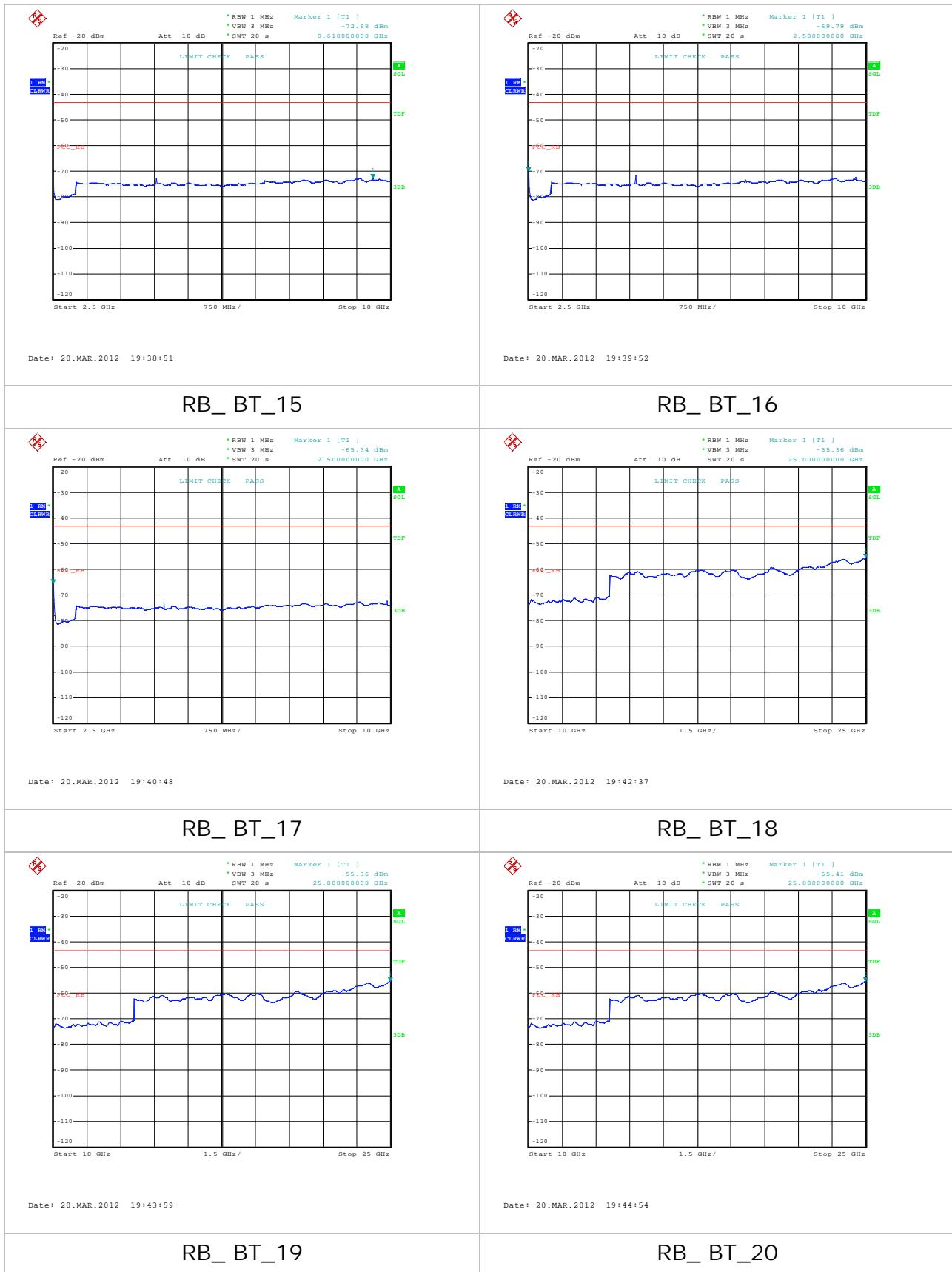


Figure 9: Restricted band emissions plots – Bluetooth 8-DPSK mode