

VTech Telecommunications Ltd.

Application

For

47 CFR Part 15 Class II Permissive Change
RSS-213 Issue 2 Equipment Class I Permissive Change

Unlicensed Personal Communication Service Devices/
2 GHz License-exempt Personal Communications Service Devices

(Base Unit)

FCC ID: EW780-6948-00

Model: LS6225, LS6225-xy, LS6226, LS6226-xy, LS6215, LS6215-xy

IC: 1135B-80694800

**Model: LS6225, LS6225-2, LS6225-3, LS6225-4, LS6225-5, LS6226-2,
LS6226-5, LS6215, LS6215-2, LS6215-3, LS6215-4, LS6215-5**

Test Report Number: HK09041275-1

Issue Date: June 11, 2009

KS/cl

- The test report only allows to be revised within the retention period unless further standard or the requirement was noticed.
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MEASUREMENT/TECHNICAL REPORT

**VTech Telecommunications Ltd. - Model: LS6225, LS6225-xy, LS6226,
LS6226-xy, LS6215, LS6215-xy
FCC ID: EW780-6948-00**

This report concerns (check one:) Original Grant Class II Change

Equipment Type : PUB - Part 15 Unlicensed PCS Base Station

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes No

If yes, defer until :

_____ Date

Company Name 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 No

If no, assumed Part 15, Subpart D for Unlicensed Personal Communication Service Device - the new 47 CFR [10-01-08 Edition] Provision.

Report prepared by: Sit Kim Wai, Ken

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Table of Contents

1.0 Summary of Test Results	4
2.0 General Description	6
2.1 Product Description	6
2.2 Technical Description	6
2.3 Purpose of Application.....	7
2.4 Test Methodology.....	7
2.5 Test Facility.....	7
3.0 System Test Configuration	9
3.1 Justification	9
3.2 EUT Exercising Software.....	10
3.3 Details of EUT and Description of Peripherals	10
3.4 Measurement Uncertainty	11
3.5 Equipment Modification	11
4.0 Measurement Results	13
4.1 Antenna Requirement	13
4.2 Directional Gain of the Antenna	13
4.3 Emissions Outside the Sub-Band	14
4.3.1 Radiated Emissions Configuration Photographs	15
4.3.2 Radiated Emissions Data	15
4.3.3 Field Strength Calculation.....	29
4.3.4 Average Factor Calculation and Transmitter ON Time Measurements	30
4.4 Radiated Emissions from Receiver	31
4.4.1 Radiated Emission Configuration Photographs	31
4.4.2 Radiated Emissions Data	31
4.5 AC Power Line Conducted Emissions from Transmitter portion of EUT.....	35
4.5.1 AC Power Line Conducted Emissions Configuration Photographs	36
4.5.2 AC Power Line Conducted Emissions Data	36
4.6 Radio Frequency Radiation Exposure	37
4.7 Radio Frequency Exposure Compliance.....	37
4.8 Monitoring Antenna	37
5.0 Equipment List	38
Appendix – Exhibits of Application for FCC Certification / IC Class I Permissive Change	

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**EXHIBIT 1
SUMMARY OF TEST RESULTS**

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1.0 Summary of Test Results

VTech Telecommunications Ltd.

FCC ID: EW780-6948-00

MODEL: LS6225, LS6225-xy, LS6226, LS6226-xy, LS6215, LS6215-xy

IC: 1135B-80694800

MODEL: LS6225, LS6225-2, LS6225-3, LS6225-4, LS6225-5, LS6226-2,
LS6226-5, LS6215, LS6215-2, LS6215-3, LS6215-4, LS6215-5

General Technical Requirements					
Test Items	RSS-213 / RSS-Gen [#] Clause	FCC Part 15 Section	Test Procedure ANSI C63.17 / ANSI C63.4 [*]	Results	Details see section
Antenna Requirement	7.1.4 [#]	15.317	---	Pass	4.1
Directional Gain of the Antenna	4.1(e)	15.319(e)	4.3.1	Pass	4.2
AC Power Line Conducted Emissions from EUT	6.3	15.315	7 [*]	Pass	4.3
Radiated Emissions from Receiver Portion of EUT	6.8	---	8 [*]	Pass	4.4
Radio Frequency Radiation Exposure	RSS-102	15.319(i)	---	Pass	4.5
Emissions Outside the Sub-Band	6.7.1	15.323(d)	6.1.6.2	Pass	4.6
Monitoring Antenna	4.3.4(b8)	15.323(c)(8)	4	Pass	4.7

Test Engineer:



Simple Shum
Engineer

Date: June 11, 2009

Approved By:



Sit Kim Wai, Ken
Assistant Manager

Date: June 11, 2009

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EXHIBIT 2 GENERAL DESCRIPTION

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2.0 General Description

2.1 Product Description

The LS6225-2 is a 1.9GHz Digital Modulation Cordless Phone with Caller ID, Speakerphone and Digital Answering Machine, while LS6215-2 is 1.9GHz Digital Modulation Cordless Phone with Caller ID and Speakerphone. They operate at frequency range of 1921.536MHz to 1928.448MHz with 5 channels (1921.536MHz, 1923.264MHz, 1924.992MHz, 1926.720MHz and 1928.448MHz). The Base Unit for LS6225-2 is powered by an AC adaptor 100-120VAC to 6VDC 400mA (Brand: Tenpao and Sunstrong) and LS6215-2 is powered by an AC adaptor 117VAC to 6VAC 300mA.

The antennas used in base units are integral, and the test sample is a prototype.

For FCC, the Model: LS6225, LS6225-xy, LS6226 and LS6226-xy are the same as the Model: LS6225-2 in hardware aspect. The LS6215 and LS6215-xy are the same as the Model: LS6215-2 in hardware aspect. Suffix (xy) indicates different packaging material and different number of handset. The difference in model number serves as marketing strategy.

For IC, the model: LS6225, LS6225-3, LS6225-4, LS6225-5, LS6226-2 and LS6226-5 are the same as the Model: LS6225-2 in hardware aspect. The Model: LS6215, LS6215-3, LS6215-4 and LS6215-5 are the same as the Model: LS6215-2 in hardware aspect. The difference in model number represents different packaging material and different number of handset. It serves as marketing strategy.

The RF modules of LS6225-2 and LS6215-2 are identical including RF algorithm.

Connection between the device and the telephone network is accomplished through the use of USOC RJ11C in the 2-wire loop calling central office line.

2.2 Technical Description

The circuit description and digital modulation techniques description are saved as filename: descri.pdf.

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2.3 Purpose of Application

The purpose of change is saved as filename: product change.pdf

2.4 Test Methodology

The radiated emission measurements for unintentional radiator (if any) and AC power line-conducted emission measurements were performed according to the test procedures specified in ANSI C63.4 (2003). The radiated emission measurements for intentional radiator contained in UPCS device was performed according to the test procedures specified in ANSI C63.17 (2006). All radiated measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "Justification Section" of this Application. All other measurements were made in accordance with the procedures in 47 CFR Part 2 / RSS-Gen Issue 2 (2007).

2.5 Test Facility

The open area test site and conducted measurement facility used to collect the emission data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC and the Industry Canada.

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**EXHIBIT 3
SYSTEM TEST CONFIGURATION**

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3.0 System Test Configuration

3.1 Justification

For emissions testing, the equipment under test (EUT) was set up to transmit continuously in burst mode with pseudo-random data to simplify the measurement methodology. Care was taken to ensure proper power supply voltages during testing. During testing, all cables (if any) were manipulated to produce worst-case emissions. The handset (if any) was powered by a fully charged battery.

For the measurements, the EUT was attached to a plastic stand if necessary and placed on the wooden turntable. If the base unit attached to peripherals, they were connected and operational (as typical as possible).

The signal was maximized through rotation and placement in the three orthogonal axes. The antenna height and polarization were varied during the search for maximum signal level. The antenna height was varied from 1 to 4 meters. Detector function was in peak mode. Radiated emissions are taken at three meters unless the signal level was too low for measurement at that distance. If necessary, a pre-amplifier was used and/or the test was conducted at a closer distance.

For UPCS transmitter radiated measurement, the spectrum analyzer resolution bandwidth was approximately 1% of EUT emission bandwidth, unless otherwise specified.

For receiver radiated measurement, the spectrum analyzer resolution bandwidth was 1 MHz for measurement above 1 GHz while 100 kHz for measurement from 30 MHz to 1 GHz.

Radiated emission measurements for UPCS transmitter were performed from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower. Receiver was performed from 30 MHz to the fifth harmonic of the highest frequency or 40 GHz, whichever is lower.

For FCC, RF module for base units of LS6225-2 and LS6215-2 are electrically identical and pin-to-pin compatible with previously granted models CS6229-2 and CS6219-2 respectively. Therefore conducted emission measurement for emission bandwidth, peak transmit power, power spectral density, emissions inside sub-bands, jitter, frame repetition stability, carrier stability and listen before transmit requirements for LS6225-2, LS6215-2 are skipped.

For IC, RF module for base units of LS6225-2 and LS6215-2 are electrically identical and pin-to-pin compatible with previously granted model LS6225-2 / LS6215-2 respectively. Therefore conducted emission measurement for emission bandwidth, peak transmit power, power spectral density, emissions inside sub-bands, jitter, frame repetition stability, carrier stability and listen before transmit requirements for LS6225-2, LS6215-2 are skipped.

As the base unit has 2 antennas, both have been checked. While conducting the test on one of antennas, another one was being disable its transmission. The data in this report represented the worst-case.

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3.2 EUT Exercising Software

The EUT exercise program (if any) used during radiated and conducted testing was designed to exercise the various system components in a manner similar to a typical use.

3.3 Details of EUT and Description of Peripherals

Details of EUT:

An AC adaptor (provided with the unit) were used to power the device. Their description are listed below.

- (1) Base Unit for Model LS6225-2: An AC adaptor (100-120VAC to 6VDC 400mA, Model: S005IU0600040) (Brand: Tenpao) (Supplied by Client)
- (2) Base Unit for Model LS6225-2: An AC adaptor (100-120VAC to 6VDC 400mA, Model: SSA-5AP-09 US 060040L) (Brand: Sunstrong) (Supplied by Client)
- (3) Base Unit for Model LS6215-2: An AC adaptor (117VAC to 6VAC 300mA, Model: UA-0603) (Supplied by Client)

Description of Peripherals:

- (1) Telecommunication cable with RJ11C connectors (1m, unshielded), terminated (Supplied by Intertek)
- (2) Handset: A "Ni-MH" type rechargeable battery (2.4V 500mAh) (Supplied by Client)
- (3) LS6225 Handset (Supplied by Client)

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3.4 Measurement Uncertainty

When determining of the test conclusion, the Measurement Uncertainty test has been considered.

Uncertainty and Compliance - Unless the standard specifically states that measured values are to be extended by the measurement uncertainty in determining compliance, all compliance determinations are based on the actual measured value.

3.5 Equipment Modification

Any modifications installed previous to testing by VTech Telecommunications Ltd. will be incorporated in each production model sold/leased in the United States/Canada.

No modifications were installed by Commercial & Electrical Division, Intertek Testing Services Hong Kong Ltd.

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**EXHIBIT 4
MEASUREMENT RESULTS**

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2

Date of Test: April 27- May 19, 2009

4.0 **Measurement Results**

4.1 Antenna Requirement, FCC Rule 15.317 / RSS-Gen Clause 7.1.4:

EUT must meet the antenna requirement of FCC Rule 15.203 / RSS-Gen Clause 7.1.4.

EUT uses a permanently attached antenna which is considered sufficient to comply with the provisions of this rule. Please refer to internal photos.pdf for more details.

EUT uses a unique antenna jack or electrical connector which is considered sufficient to comply with the provisions of this rule. Please refer to internal photos.pdf for more details.

4.2 Directional Gain of the Antenna, FCC Rule FCC 15.319(e) / RSS-213 Clause 4.1(e):

The peak transmit power shall be reduced by the amount in dB that the maximum directional gain of the antenna exceeds 3 dBi.

The requirements are made in accordance with ANSI C63.17 sub-clause 4.3.1 / RSS-213 Clause 4.1(e).

Manufacturer declares that the directional gain of the antenna is less than or equal to 3dBi. No peak transmit power reduction is required.

Manufacturer declares that the directional gain of the antenna is greater than 3dBi. The peak transmit power shall be reduced by _____ dB.

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Company: VTech Telecommunications Ltd.
 Model: LS6225-2, LS6215-2

Date of Test: April 27- May 19, 2009

4.3 Emissions Outside the Sub-Band, FCC Rule 15.323(d) / RSS-213 Clause 6.7.1:

Emissions outside the sub-band shall be attenuated below a reference power of 112 mW (20.5 dBm) as follows:

1. 30 dB between the band edge and 1.25 MHz above or below the band;
2. 50 dB between 1.25 and 2.5 MHz above or below the band; and
3. 60 dB at 2.5 MHz or greater above or below the band, or shall meet the requirement of FCC Rule 15.319(g) which shall not exceed the limits of FCC Rule 15.209 / RSS-210 Clause 2.6.

Example: Calculation of Limit for emissions between the band edge and 1.25 MHz (1920.000 – 1918.750 MHz)

The emissions shall not exceed the Limit: 20.5 dBm – 30 dB = -9.5 dBm

Measurements are made in accordance with ANSI C63.17 sub-clause 6.1.6.2. As EUT has non-detachable antenna(s), radiated emissions test method is used for out-of-band emissions tests. Emissions that are directly caused by digital circuits in the transmit path and transmitter portion are measured. Test setup and procedures are described in section 3.2 Figure 3.2.1.

Test Results:

Channel	Carrier Frequency (MHz)	Measured Band (MHz)	Limit (dBm)	Results
Lowest	1921.536	1920.000 - 1918.750	-9.5	Pass
		1918.750 - 1917.500	-29.5	Pass
		0.009 - 1917.500 & 1932.500 - 19300.000	-39.5 / FCC Rule 15.209 / RSS-210 Clause 2.6	Pass
Highest	1928.448	1930.000 - 1931.250	-9.5	Pass
		1931.250 - 1932.500	-29.5	Pass
		0.009 – 1917.500 & 1932.500 - 19300.000	-39.5 / FCC Rule 15.209 / RSS-210 Clause 2.6	Pass

Please refer to the section 4.3.1 to 4.3.4 for more details.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2, LS6215-2

Mode: Transmission

4.3.1 Radiated Emissions Configuration Photographs :

Worst Case Radiated Emission
at

Base Unit for Model: LS6225-2 (Brand: Tenpao) – 5785.344 MHz

Base Unit for Model: LS6225-2 (Brand: Sunstrong) – 7686.144 MHz

Base Unit for Model: LS6215-2 – 11570.688 MHz

The worst case radiated emission configuration photographs are saved as filename:
config photos.pdf

4.3.2 Radiated Emissions Data:

Data are included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included. All measurements were performed with peak detection unless otherwise specified.

The data in table 1-13 list the significant emission frequencies, the limit and the margin of compliance.

Judgement:

Base Unit for Model: LS6225-2 (Brand: Tenpao) – Passed by 1.2 dB margin compared with average limit

Base Unit for Model: LS6225-2 (Brand: Sunstrong) – Passed by 1.5 dB margin compared with average limit

Base Unit for Model: LS6215-2 – Passed by 4.1 dB margin

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2 (Brand: Tenpao)

Mode: Transmission

Table 1, Base Unit

**Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements**

Lowest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1917.101	-52.0	-39.5	-12.5
V	1918.085	-47.6	-29.5	-18.1
V	1919.853	-43.2	-9.5	-33.7

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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Company: VTech Telecommunications Ltd.
 Model: LS6225-2 (Brand: Tenpao)
 Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 2, Base Unit

Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 / RSS-210 Clause 2.6 Emissions Requirements

Lowest Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Average Factor (dB)	Calculated at 3m (dB μ V/m)	Average Limit at 3m (dB μ V/m)	Margin (dB)
V	3843.072	62.5	33	33.3	62.8	15.6	47.2	54.0	-6.8
H	5764.608	63.6	33	36.6	67.2	15.6	51.6	54.0	-2.4
H	7686.144	62.3	33	38.9	68.2	15.6	52.6	54.0	-1.4
H	9607.680	55.2	33	40.4	62.6	15.6	47.0	54.0	-7.0
H	11529.216	57.1	33	40.5	64.6	15.6	49.0	54.0	-5.0
H	13450.752	52.0	33	41.9	60.9	15.6	45.3	54.0	-8.7

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Peak Limit at 3m (dB μ V/m)	Margin (dB)
V	3843.072	62.5	33	33.3	62.8	74.0	-11.2
H	5764.608	63.6	33	36.6	67.2	74.0	-6.8
H	7686.144	62.3	33	38.9	68.2	74.0	-5.8
H	9607.680	55.2	33	40.4	62.6	74.0	-11.4
H	11529.216	57.1	33	40.5	64.6	74.0	-9.4
H	13450.752	52.0	33	41.9	60.9	74.0	-13.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2 (Brand: Tenpao)
Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 3, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements

Highest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.104	-42.9	-9.5	-33.4
V	1931.692	-47.0	-29.5	-17.5
V	1933.475	-51.8	-39.5	-12.3

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
 Model: LS6225-2 (Brand: Tenpao)
 Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 4, Base Unit

Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 / RSS-210 Clause 2.6 Emissions Requirements

Highest Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Average Factor (dB)	Calculated at 3m (dB μ V/m)	Average Limit at 3m (dB μ V/m)	Margin (dB)
V	3856.896	63.0	33	33.3	63.3	15.6	47.7	54.0	-6.3
H	5785.344	64.8	33	36.6	68.4	15.6	52.8	54.0	-1.2
H	7713.792	62.1	33	38.9	68.0	15.6	52.4	54.0	-1.6
H	9642.240	55.0	33	40.4	62.4	15.6	46.8	54.0	-7.2
H	11570.688	54.8	33	40.5	62.3	15.6	46.7	54.0	-7.3
H	13499.136	51.5	33	41.9	60.4	15.6	44.8	54.0	-9.2

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Peak Limit at 3m (dB μ V/m)	Margin (dB)
V	3856.896	63.0	33	33.3	63.3	74.0	-10.7
H	5785.344	64.8	33	36.6	68.4	74.0	-5.6
H	7713.792	62.1	33	38.9	68.0	74.0	-6.0
H	9642.240	55.0	33	40.4	62.4	74.0	-11.6
H	11570.688	54.8	33	40.5	62.3	74.0	-11.7
H	13499.136	51.5	33	41.9	60.4	74.0	-13.6

NOTES:

- 1 Peak detector is used for the emission measurement.
- 2 All measurements were made at 3 meters.
- 3 Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2 (Brand: Tenpao)

Mode: Talk

Table 5, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	56.900	-63.2	-39.5	-23.7
V	113.800	-63.8	-39.5	-24.3
H	170.700	-64.3	-39.5	-24.8
H	227.600	-64.6	-39.5	-25.1
H	284.500	-64.9	-39.5	-25.4
H	341.400	-65.6	-39.5	-26.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2 (Brand: Sunstrong)

Mode: Transmission

Table 6, Base Unit

**Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements**

Lowest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1917.102	-51.6	-39.5	-12.1
V	1918.086	-47.0	-29.5	-17.5
V	1919.853	-42.8	-9.5	-33.3

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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Company: VTech Telecommunications Ltd.
 Model: LS6225-2 (Brand: Sunstrong)
 Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 7, Base Unit

Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 / RSS-210 Clause 2.6 Emissions Requirements

Lowest Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Average Factor (dB)	Calculated at 3m (dB μ V/m)	Average Limit at 3m (dB μ V/m)	Margin (dB)
V	3843.072	62.2	33	33.3	62.5	15.6	46.9	54.0	-7.1
H	5764.608	63.8	33	36.6	67.4	15.6	51.8	54.0	-2.2
H	7686.144	62.2	33	38.9	68.1	15.6	52.5	54.0	-1.5
H	9607.680	53.8	33	40.4	61.2	15.6	45.6	54.0	-8.4
H	11529.216	55.7	33	40.5	63.2	15.6	47.6	54.0	-6.4
H	13450.752	51.8	33	41.9	60.7	15.6	45.1	54.0	-8.9

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Peak Limit at 3m (dB μ V/m)	Margin (dB)
V	3843.072	62.2	33	33.3	62.5	74.0	-11.5
H	5764.608	63.8	33	36.6	67.4	74.0	-6.6
H	7686.144	62.2	33	38.9	68.1	74.0	-5.9
H	9607.680	53.8	33	40.4	61.2	74.0	-12.8
H	11529.216	55.7	33	40.5	63.2	74.0	-10.8
H	13450.752	51.8	33	41.9	60.7	74.0	-13.3

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2 (Brand: Sunstrong)
Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 8, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements

Highest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.104	-42.8	-9.5	-33.3
V	1931.692	-46.9	-29.5	-17.4
V	1933.475	-51.6	-39.5	-12.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
 Model: LS6225-2 (Brand: Sunstrong)
 Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 9, Base Unit

Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 / RSS-210 Clause 2.6 Emissions Requirements

Highest Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Average Factor (dB)	Calculated at 3m (dB μ V/m)	Average Limit at 3m (dB μ V/m)	Margin (dB)
V	3856.896	62.3	33	33.3	62.6	15.6	47.0	54.0	-7.0
H	5785.344	63.6	33	36.6	67.2	15.6	51.6	54.0	-2.4
H	7713.792	61.9	33	38.9	67.8	15.6	52.2	54.0	-1.8
H	9642.240	53.8	33	40.4	61.2	15.6	45.6	54.0	-8.4
H	11570.688	55.5	33	40.5	63.0	15.6	47.4	54.0	-6.6
H	13499.136	51.9	33	41.9	60.8	15.6	45.2	54.0	-8.8

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB μ V/m)	Peak Limit at 3m (dB μ V/m)	Margin (dB)
V	3856.896	62.3	33	33.3	62.6	74.0	-11.4
H	5785.344	63.6	33	36.6	67.2	74.0	-6.8
H	7713.792	61.9	33	38.9	67.8	74.0	-6.2
H	9642.240	53.8	33	40.4	61.2	74.0	-12.8
H	11570.688	55.5	33	40.5	63.0	74.0	-11.0
H	13499.136	51.9	33	41.9	60.8	74.0	-13.2

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2 (Brand: Sunstrong)

Mode: Talk

Table 10, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	56.900	-63.3	-39.5	-23.8
V	113.800	-63.5	-39.5	-24.0
H	170.700	-64.2	-39.5	-24.7
H	227.600	-63.3	-39.5	-23.8
H	284.500	-63.4	-39.5	-23.9
H	341.400	-64.2	-39.5	-24.7

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.

Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6215-2
Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 11, Base Unit

**Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements**

Lowest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1919.854	-41.6	-9.5	-32.1
V	1918.085	-48.3	-29.5	-18.8
V	1917.101	-52.4	-39.5	-12.9
V	3843.072	-45.6	-39.5	-6.1
H	5764.608	-46.5	-39.5	-7.0
H	7686.144	-45.0	-39.5	-5.5
H	9607.680	-46.0	-39.5	-6.5
H	11529.216	-43.8	-39.5	-4.3
H	13450.752	-46.0	-39.5	-6.5

NOTES:

4. Peak detector is used for the emission measurement.
5. All measurements were made at 3 meters.
6. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6215-2
Mode: Transmission

Date of Test: April 27- May 19, 2009

Table 12, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.209 / RSS-210 Clause 2.6
Emissions Requirements

Highest Channel

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.014	-41.1	-9.5	-31.6
V	1931.685	-48.0	-29.5	-18.5
V	1933.476	-52.3	-39.5	-12.8
V	3856.896	-45.3	-39.5	-5.8
H	5785.344	-46.6	-39.5	-7.1
H	7713.792	-45.0	-39.5	-5.5
H	9642.240	-45.6	-39.5	-6.1
H	11570.688	-43.6	-39.5	-4.1
H	13499.136	-45.6	-39.5	-6.1

NOTES:

- 4 Peak detector is used for the emission measurement.
- 5 All measurements were made at 3 meters.
- 6 Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6215-2

Mode: Talk

Table 13, Base Unit

Radiated Emissions Data
Pursuant To FCC Part 15 Section 15.323 (d) / RSS-213 Clause 6.7.1
Emissions Requirements

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	55.304	-63.8	-39.5	-24.3
V	82.956	-64.0	-39.5	-24.5
V	110.606	-63.2	-39.5	-23.7
H	138.260	-63.1	-39.5	-23.6
H	165.912	-63.9	-39.5	-24.4
H	193.564	-64.6	-39.5	-25.1

NOTES:

4. Peak detector is used for the emission measurement.
5. All measurements were made at 3 meters.
6. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2

Date of Test: April 27- May 19, 2009

4.3.3 Field Strength Calculation

The field strength is calculated by adding the reading on the Spectrum Analyzer to the factors associated with preamplifiers (if any), antennas, cables, pulse desensitization and average factors (when specified limit is in average and measurements are made with peak detectors). A sample calculation is included below.

$$FS = RA + AF + CF - AG + PD + AV$$

Where

- FS = Field Strength in dB μ V/m
- RA = Receiver Amplitude (including preamplifier) in dB μ V
- CF = Cable Attenuation Factor in dB
- AF = Antenna Factor in dB
- AG = Amplifier Gain in dB
- PD = Pulse Desensitization in dB
- AV = Average Factor in -dB

In the radiated emission table which follows, the reading shown on the data table may reflect the preamplifier gain. An example of the calculations, where the reading does not reflect the preamplifier gain, follows:

$$FS = RA + AF + CF - AG + PD + AV$$

Example

Assume a receiver reading of 62.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29.0 dB is subtracted. The pulse desensitization factor of the spectrum analyzer is 0.0 dB, and the resultant average factor is -10.0 dB. The net field strength for comparison to the appropriate emission limit is 32.0 dB μ V/m. This value in dB μ V/m is converted to its corresponding level in μ V/m.

RA = 62.0 dB μ V
AF = 7.4 dB
CF = 1.6 dB
AG = 29.0 dB
PD = 0.0 dB
AV = -10 dB

$$FS = 62.0 + 7.4 + 1.6 - 29.0 + 0.0 + (-10.0) = 32.0 \text{ dB}\mu\text{V/m}$$

$$\text{Level in mV/m} = \text{Common Antilogarithm} [(32.0 \text{ dB}\mu\text{V/m})/20] = 39.8 \mu\text{V/m}$$

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2

Date of Test: April 27- May 19, 2009

4.3.4 Average Factor Calculation and Transmitter ON Time Measurements, FCC Rule 15.35(b, c) / RSS-Gen cl 4.5

Base Unit: (For 4 handsets operation with dummy)

Duty Cycle (DC) = Maximum ON time in 10ms/10ms
= (4 x 1 x 0.388ms + 0.102ms)/10ms

Average Factor (AF) = 20 log (DC)
= 20* log (0.1654)
= -15.6 dB

[x] The EUT antenna output port was connected to the input of the spectrum analyzer. The analyzer center frequency was set to EUT RF channel carrier. The SPAN function on the analyzer was set to ZERO. The transmitter ON time was determined from the resultant time-amplitude display:

Please refer to the attached plots for more details:

The plots of Transmitter ON Time Measurements are saved as filename: txon.pdf

[] Please refer to the attached transmitter timing diagram that are provided by manufacturer

[] Not applicable - No average factor is required.

[] Please refer to Technical Description (descri.pdf) for more details

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2, LS6215-2

Mode: Receiving

4.4 Radiated Emissions from Receiver, RSS-213 Clause 6.8

The receiver portion is subject to the requirements of RSS-Gen Clause 7.2.3.2 and the radiated emission shall not exceed the limits of Table 1 in RSS-Gen Clause 6 (a).

Measurements are made in accordance with ANSI C63.4 sub-clause 8. Radiated emissions shall be measured with EUT operating in typical operation modes.

4.4.1 Radiated Emission Configuration Photographs:

Worst Case Radiated Emission
at

Base Unit for Model: LS6225-2 (Brand: Tenpao) – 2565.504 MHz

Base Unit for Model: LS6225-2 (Brand: Sunstrong) – 2565.504 MHz

Base Unit for Model: LS6215-2 – 2565.504 MHz

The worst case radiated emission configuration photographs are saved as filename: config photos.pdf.

4.4.2 Radiated Emissions Data:

Data are included of the worst-case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included. All measurements were performed with peak detection unless otherwise specified.

The data in table 14-16 list the significant emission frequencies, the limit and the margin of compliance.

Judgement:

Base Unit for Model: LS6225-2 (Brand: Tenpao) – Passed by 3.4 dB margin

Base Unit for Model: LS6225-2 (Brand: Sunstrong) – Passed by 3.8 dB margin

Base Unit for Model: LS6215-2 – Passed by 5.4 dB margin

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.

Date of Test: April 27- May 19, 2009

Model: LS6225-2 (Brand: Tenpao)

Mode: Receiving

Table 14, Base Unit

**Radiated Emissions Data
Pursuant To RSS-213 Clause 6.8 Emissions Requirements**

Middle Channel

Polari- zation	Frequency (MHz)	Reading (dB μ V)	Pre- amp (dB)	Antenna Factor (dB)	Net at 3m (dB μ V/m)	Limit at 3m (dB μ V/m)	Margin (dB)
H	1282.752	50.3	33	26.1	43.4	54.0	-10.6
H	2565.504	53.2	33	30.4	50.6	54.0	-3.4
H	3848.256	42.1	33	33.3	42.4	54.0	-11.6
H	5131.008	37.9	33	35.7	40.6	54.0	-13.4
H	7696.512	34.3	33	38.9	40.2	54.0	-13.8
H	10262.016	32.5	33	40.5	40.0	54.0	-14.0

NOTES:

1. Peak detector is used for the emission measurement.
2. The resolution bandwidth of the spectrum analyzer shall be 100kHz for spurious emission measurements below 1.0GHz and 1.0MHz for measurements above 1.0GHz.
3. All measurements were made at 3 meters.
4. Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2 (Brand: Sunstrong)
Mode: Receiving

Date of Test: April 27- May 19, 2009

Table 15, Base Unit

**Radiated Emissions Data
Pursuant To RSS-213 Clause 6.8 Emissions Requirements**

Middle Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-amp (dB)	Antenna Factor (dB)	Net at 3m (dB μ V/m)	Limit at 3m (dB μ V/m)	Margin (dB)
H	1282.752	50.3	33	26.1	43.4	54.0	-10.6
H	2565.504	52.8	33	30.4	50.2	54.0	-3.8
H	3848.256	42.3	33	33.3	42.6	54.0	-11.4
H	5131.008	37.9	33	35.7	40.6	54.0	-13.4
H	7696.512	34.5	33	38.9	40.4	54.0	-13.6
H	10262.016	32.7	33	40.5	40.2	54.0	-13.8

NOTES:

- 1 Peak detector is used for the emission measurement.
- 2 The resolution bandwidth of the spectrum analyzer shall be 100kHz for spurious emission measurements below 1.0GHz and 1.0MHz for measurements above 1.0GHz.
- 3 All measurements were made at 3 meters.
- 4 Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6215-2
Mode: Receiving

Date of Test: April 27- May 19, 2009

Table 16, Base Unit

Radiated Emissions Data Pursuant To RSS-213 Clause 6.8 Emissions Requirements

Middle Channel

Polarization	Frequency (MHz)	Reading (dB μ V)	Pre-amp (dB)	Antenna Factor (dB)	Net at 3m (dB μ V/m)	Limit at 3m (dB μ V/m)	Margin (dB)
V	1282.752	50.1	33	26.1	43.2	54.0	-10.8
V	2565.504	51.2	33	30.4	48.6	54.0	-5.4
V	3848.256	43.1	33	33.3	43.4	54.0	-10.6
V	5131.508	39.2	33	35.7	41.9	54.0	-12.1
V	7696.512	34.9	33	38.9	40.8	54.0	-13.2
V	10262.016	32.7	33	40.5	40.2	54.0	-13.8

NOTES:

- 5 Peak detector is used for the emission measurement.
- 6 The resolution bandwidth of the spectrum analyzer shall be 100kHz for spurious emission measurements below 1.0GHz and 1.0MHz for measurements above 1.0GHz.
- 7 All measurements were made at 3 meters.
- 8 Negative value in the margin column shows emission below limit.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2

Date of Test: April 27-May 19, 2009

4.5 AC Power Line Conducted Emissions from Transmitter portion of EUT, FCC Rule 15.315 / RSS-213 Clause 6.3:

The AC power lines conducted emission shall not exceed the limits of FCC Rule 15.207 / Table 2 in RSS-Gen Clause 7.2.2.

Measurements are made in accordance with ANSI C63.4 sub-clause 7. Emissions that are directly caused by digital circuits in the transmit path and transmitter portion are measured.

Not applicable – EUT is only powered by battery for operation.

EUT connects to AC power lines. Emission Data are listed in following pages.

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2
Model: Talk

Date of Test: April 27-May 19, 2009

4.5.1 AC Power Line Conducted Emissions Configuration Photographs:

Worst Case AC Power Line Conducted Emission

The worst case AC power Line conducted emission configuration photographs are saved as filename: config photos.pdf

4.5.2 AC Power Line Conducted Emissions Data:

The data on the following pages list the significant emission frequencies, the limit, and the margin of compliance.

Judgment:

Base Unit for Model: LS6225-2 (Brand: Tenpao) – Passed by more than 20 dB margin

Base Unit for Model: LS6225-2 (Brand: Sunstrong) – Passed by more than 20 dB margin

Base Unit for Model: LS6215-2 – Passed by more than 20 dB margin

The worst case AC power line conducted emission data are saved as filename: conduct.pdf

INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.
Model: LS6225-2, LS6215-2

Date of Test: April 27-May 19, 2009

4.6 Radio Frequency Radiation Exposure, FCC Rule 15.319(i):

EUT is subject to the radio frequency exposure requirements specified in FCC Rule §§ 1.1307(b), 2.1091 and 2.1093. It shall be considered to operate in a “general population / uncontrolled” environment.

- Handset unit: EUT was evaluated for Specific Absorption Rate (SAR) evaluation compliance according to OET Bulletin 65, Supplement C (Edition 01-01). It is in compliance with the SAR evaluation requirements. A SAR test report was submitted at same time and saved as SAR Report.pdf.
- Base unit: EUT was evaluated for Maximum Permissible Exposure (MPE) evaluation compliance according to OET Bulletin 65, Supplement C (Edition 01-01). The evaluation calculation results are saved as filename: RF exposure info.pdf.

4.7 Radio Frequency Exposure Compliance, RSS-102:

The Routine RF Exposure Evaluation, Routine SAR Evaluation and Declaration of RF Exposure Compliance are saved as filename: RF exposure.pdf

4.8 Monitoring Antenna, FCC Rule 15.323(c)(8) / RSS-213 Clause 4.3.4(b)(8):

The monitoring system shall use the same antenna used for transmission, or an antenna that yields equivalent reception at that location.

- EUT uses the same antenna used for transmission and monitoring that is in compliance meet above provision.
- EUT uses difference antenna used for transmission and monitoring. It must be verified that the monitoring antenna provides coverage equivalent to that of the transmitting antenna. Measurements are made in accordance with ANSI C63.17 sub-clause 4.

INTERTEK TESTING SERVICES

5.0 Equipment List

1) Radiated Emissions Test

Equipment	Biconical Antenna	Log Periodic Antenna	Double Ridged Guide Antenna
Registration No.	EW-0954	EW-0446	EW-1015
Manufacturer	EMCO	EMCO	EMCO
Model No.	3104C	3146	3115
Calibration Date	Sep. 30, 2008	Oct. 02, 2008	Jul. 28, 2008
Calibration Due Date	Mar. 30, 2010	Apr. 02, 2010	Jan. 28, 2010

Equipment	EMI Test Receiver	Spectrum Analyzer
Registration No.	EW-0014	EW-2188
Manufacturer	R&S	AGILENTTECH
Model No.	ESVS30	E4407B
Calibration Date	May 09, 2008	Dec. 18, 2008
Calibration Due Date	May 09, 2009	Dec. 18, 2009

Equipment	RF Pre-Amplifier	EMI Test Receiver
Registration No.	EW-1779a	EW-0016
Manufacturer	MITEQ	R&S
Model No.	AMF-4D-001120-34-13P	ESVS30
Calibration Date	Jul. 05, 2008	April 14, 2009
Calibration Due Date	Aug. 01, 2009	May 09, 2010

2) Conducted Emissions Test

Equipment	EMI Test Receiver	LISN	Pulse Limiter
Registration No.	EW-2251	EW-0192	EW-0700
Manufacturer	R&S	R&S	R&S
Model No.	ESCI	ESH3-Z5	ESH3-Z2
Calibration Date	Oct. 28, 2008	Nov. 12, 2008	Dec 04, 2007
Calibration Due Date	Oct. 28, 2009	Nov. 12, 2009	Jun. 04, 2009