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Measured Radio Frequency Emissions  
From

**Code Systems, Inc Transceiver  
Transmitter Report  
FCC ID: GOH-GMHHU01  
Model/PN(s): 19131603, 19131612, 19131613**

Report No. 415031-382  
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### Summary

Tests for compliance with FCC Regulations Part 15, Subpart C, and Industry Canada RSS-210/GEN, were performed on Code Systems, Inc model/PN(s) 19131603, 19131612, 19131613. This device is subject to the Rules and Regulations as a Transceiver.

In testing completed on September 18, 2007, the device tested in the worst case met the allowed FCC specifications for radiated emissions by 1.3 dB (see p. 6). Besides harmonics, there were no other significant spurious emissions found; emissions from digital circuitry were negligible. The conducted emission tests do not apply, since the device is powered from a 3 VDC battery.

## 1. Introduction

Code Systems, Inc model/PN(s) 19131603, 19131612, 19131613 was(were) tested for compliance with FCC Regulations, Part 15, adopted under Docket 87-389, April 18, 1989 as subsequently amended, and with Industry Canada RSS-210/Gen, Issue 7, June 2007. The tests were performed at the University of Michigan Radiation Laboratory Willow Run Test Range following the procedures described in ANSI C63.4-2003 "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz". The Site description and attenuation characteristics of the Open Area Test Site are on file with FCC Laboratory, Columbia, Maryland (FCC Reg. No: 91050) and with Industry Canada, Ottawa, ON (File Ref. No: IC 2057A-1).

## 2. Test Procedure and Equipment Used

The pertinent test equipment commonly used in our facility for measurements is listed in Table 2.1 below. The middle column identifies the specific equipment used in these tests.

**Table 2.1 Test Equipment.**

<b>Test Instrument</b>	<b>Eqpt. Used</b>	<b>Manufacturer/Model</b>
Spectrum Analyzer (0.1-1500 MHz)		Hewlett-Packard, 182T/8558B
Spectrum Analyzer (9kHz-22GHz)	X	Hewlett-Packard 8593A SN: 3107A01358
Spectrum Analyzer (9kHz-26GHz)	X	Hewlett-Packard 8593E, SN: 3412A01131
Spectrum Analyzer (9kHz-26GHz)		Hewlett-Packard 8563E, SN: 3310A01174
Spectrum Analyzer (9kHz-40GHz)		Hewlett-Packard 8564E, SN: 3745A01031
Power Meter		Hewlett-Packard, 432A
Power Meter		Anritsu, ML4803A/MP
Harmonic Mixer (26-40 GHz)		Hewlett-Packard 11970A, SN: 3003A08327
Harmonic Mixer (40-60 GHz)		Hewlett-Packard 11970U, SN: 2332A00500
Harmonic Mixer (75-110 GHz)		Hewlett-Packard 11970W, SN: 2521A00179
Harmonic Mixer (140-220 GHz)		Pacific Millimeter Prod., GMA, SN: 26
S-Band Std. Gain Horn		S/A, Model SGH-2.6
C-Band Std. Gain Horn		University of Michigan, NRL design
XN-Band Std. Gain Horn		University of Michigan, NRL design
X-Band Std. Gain Horn		S/A, Model 12-8.2
X-band horn (8.2- 12.4 GHz)		Narda 640
X-band horn (8.2- 12.4 GHz)		Scientific Atlanta , 12-8.2, SN: 730
K-band horn (18-26.5 GHz)		FXR, Inc., K638KF
Ka-band horn (26.5-40 GHz)		FXR, Inc., U638A
U-band horn (40-60 GHz)		Custom Microwave, HO19
W-band horn(75-110 GHz)		Custom Microwave, HO10
G-band horn (140-220 GHz)		Custom Microwave, HO5R
Bicone Antenna (30-250 MHz)	X	University of Michigan, RLBC-1
Bicone Antenna (200-1000 MHz)	X	University of Michigan, RLBC-2
Dipole Antenna Set (30-1000 MHz)	X	University of Michigan, RLDP-1,-2,-3
Dipole Antenna Set (30-1000 MHz)		EMCO 2131C, SN: 992
Active Rod Antenna (30 Hz-50 MHz)		EMCO 3301B, SN: 3223
Active Loop Antenna (30 Hz-50 MHz)		EMCO 6502, SN:2855
Ridge-horn Antenna (300-5000 MHz)	X	University of Michigan
Amplifier (5-1000 MHz)	X	Avantak, A11-1, A25-1S
Amplifier (5-4500 MHz)	X	Avantak
Amplifier (4.5-13 GHz)		Avantek, AFT-12665
Amplifier (6-16 GHz)		Trek
Amplifier (16-26 GHz)		Avantek
LISN Box		University of Michigan
Signal Generator		Hewlett-Packard 8657B

### 3. Device Under Test

#### 3.1 Identification

The DUT is a 315 MHz transceiver, 2 x 1.2 x 0.75 inches in size. The device is the handheld unit used in a two way remote vehicle start/keyless entry system. The DUT contains both a 315 MHz transmitter and a 315 MHz receiver. Emissions relating only to the transmitter portion of the device are reported herein. The DUT transmits Manchester encoded data at 4.2 kbs. The antenna is a coiled wire winding soldered to the PCB. The DUT was designed and manufactured by Code Systems, Inc, 525 Minnesota Ave., Troy, Michigan 48083. It is identified as:

Code Systems, Inc. Transceiver  
Model/PN(s): 19131603, 19131612, 19131613  
FCC ID: GOH-GMHU01  
IC: 3954A-HHU1

#### 3.2 Variants

There are three variants of the DUT. All three contain identical RF components, but differ in implementation of the front pushbuttons. For the six button transmitters, the bottom front button can either be a trunk button (19131603) or a panic button (19131612) the only difference is the rubber and the installation of a zero ohm jumper in model 19131612 to tell the microprocessor what feature to implement. The seven button transmitter (19131613) has an additional switch placed on the control board.

#### 3.3 Modes of Operation

There is only a single mode of operation for this device, with different coding for different button press. Please also note that the DUT is manually activated and ceases to transmit within 5 seconds of deactivation. See Figure 6.1.

#### 3.4 EMI/EMC Relevant Modifications

There were no modifications made to the DUT by this laboratory.

### 4. Emission Limits

The DUT tested falls under the category of an Intentional Radiators and the Digital Devices. For FCC, it is subject to Part 15, Subpart C, (Section 15.231(a-c), 15.209), and Subpart A, (Section 15.33). For Industry Canada it is subject to RSS-210 (Section 2.6 and 2.7). The applicable testing frequencies with corresponding emission limits are given in Tables 4.1 and 4.2 below.

#### 4.1 Radiated Emission Limits

Table 4.1. Radiated Emission Limits (FCC: 15.33, 15.35, 15.209; IC: RSS-210, 2.7 Table 2).  
(Digital Class B)

Freq. (MHz)	E <sub>lim</sub> (3m) $\mu$ V/m	E <sub>lim</sub> dB( $\mu$ V/m)
30-88	100	40.0
88-216	150	43.5
216-960	200	46.0
960-2000	500	54.0

Note: Average readings apply above 1000 MHz (1 MHz BW)  
Quasi-Peak readings apply to 1000 MHz (120 kHz BW)

Table 4.2. Radiated Emission Limits (FCC: 15.231(b), 15.205(a); IC: RSS-210; 2.7 Table 4).  
(Transmitter)

Frequency (MHz)	Fundamental Ave. E <sub>lim</sub> (3m)		Spurious** Ave. E <sub>lim</sub> (3m)	
	(μV/m)	dB (μV/m)	(μV/m)	dB (μV/m)
260.0-470.0	3750-12500*		375-1250	
315	6042	75.6	604.2	55.6
433.9	10966	80.8	1096.6	60.8
322-335.4 399.9-410 608-614	Restricted Bands		200	46.0
960-1240/1427(IC) 1300-1427 1435-1626.5 1645.5-1646.5 (IC) 1660-1710 1718.9-1722.2 2200-2300	Restricted Bands		500	54.0

\* Linear interpolation, formula:  $E = -7083 + 41.67 \cdot f$  (MHz)

\*\* Measure up to tenth harmonic; 120 kHz BW up to 1 GHz, 1 MHz BW above 1 GHz

#### 4.3 Exemptions

None.

#### 4.4 Power Line Conducted Emission Limits

The power line conducted emission limits and tests do not apply here, as the DUT is powered by a 3 VDC battery.

#### 4.5 Supply Voltage Variation

Measurements of the variation in the fundamental radiated emission shall be performed with the supply voltage varied between 85% and 115% of the nominal rated value. For battery operated equipment, the equipment tests shall be performed using a new battery.

### 5. Test Procedures

#### 5.1 Semi-Anechoic Chamber Radiated Emission Testing

To become familiar with the emission behavior of the DUT, the DUT was first studied and measured in a shielded semi-anechoic chamber. In the chamber is set-up similar to that of an outdoor 3-meter site, with a turntable, antenna mast, and a ground plane. Instrumentation includes spectrum analyzers and other equipment as needed.

In testing for radiated emissions, a transmitter was provided by the manufacturer that is capable of repeated emissions. It was placed on the test table flat, on its side, and on its end. In the chamber we studied and recorded all the emissions using a Bicone antenna up to 300 MHz and a ridged horn antenna above 200 MHz. The measurements made in the chamber below 1 GHz are used for pre-test evaluation only. The measurements made above 1 GHz are used in pre-test evaluation and in final compliance assessment. We note that for the horn antenna, the antenna pattern is directive and the measurement is essentially that of free space (no ground reflection). Consequently, it is not essential to measure the DUT for both antenna polarizations, as long as the DUT is measured on all three of its major axis. In the chamber we also recorded the spectrum and modulation characteristics of the carrier. These data are presented in subsequent sections.

## **5.2 Open Area Test Site (OATS) Radiated Emission Testing**

After the chamber measurements are complete, emissions are re-measured on the outdoor 3-meter open area test site at the fundamental and harmonics up to 1 GHz using tuned dipoles and/or a high frequency biconical antenna. The DUT is placed on the test table flat, on its side, and on its end, and worst case emissions are recorded. Photographs included in this filing show the DUT on the OATS.

## **5.3 Field Calculation for Radiated Emission Measurements**

To convert the dBm's measured on the spectrum analyzer to dB( $\mu$ V/m), we use expression

$$E_3(\text{dB}\mu\text{V/m}) = 107 + P_R + K_A - K_G$$

where  $P_R$  = power recorded on spectrum analyzer, dB, measured at 3m  
 $K_A$  = antenna factor, dB/m  
 $K_G$  = pre-amplifier gain, including cable loss, dB

When presenting the data, at each frequency the highest measured emission under all of the possible orientations is given. Computations and results are given in Table 5.1. There we see that the DUT meets the limit by 1.3 dB dB.

## **5.4 Power Line Conducted Emission Testing**

These tests do not apply, since the DUT is powered from a 3 VDC battery.

# **6. Test Results**

## **6.1 Correction for Pulse Operation**

When the transmitter is activated by button press it can, in the worst case, repeatedly transmit Manchester encoded ASK data with a period of 101.0 ms, an on time of 19.375 ms until the button is released, up to 30.75 seconds. For a single button press and release, 4 datasets are transmitted. See Figure 6.1.

Computing the duty factor results in:

$$K_E = (19.375 \text{ ms} \times 0.125 \text{ ms} / 0.240 \text{ ms}) / 100 \text{ ms} = 0.101 \text{ or } -19.9 \text{ dB.}$$

## **6.2 Emission Spectrum**

Using the ridge-horn antenna and DUT placed in its aperture, emission spectrum was recorded and is shown in Figure 6.2. We note that in scanning from 30 MHz to 4.5 GHz using Bicone and the ridge horn antennas, there were no other significant spurious emissions observed.

## **6.3 Bandwidth of the Emission Spectrum**

The measured spectrum of the signal is shown in Figure 6.3. The allowed (-20 dB, 99%) bandwidth is 0.25% of 315 MHz, or 787.25 kHz. From the plot we see that the -20 dB bandwidth is 330.0 kHz, and the center frequency is 314.99 MHz.

## **6.4 Effect of Supply Voltage Variation and Test Battery Voltages**

The DUT has been designed to be powered by a 3 VDC battery. For this test, the battery was replaced by a laboratory variable power supply. Relative power radiated was measured at the fundamental as the voltage was varied from 2 to 4 volts. The emission variation is shown in Figure 6.4.

Batteries:	before testing	$V_{oc} =$	3.20 V
	after testing	$V_{oc} =$	3.02 V
Ave. current from batteries		$I =$	42 mA (pulsed)

**Table 5.1 Highest Emissions Measured**

<b>Radiated Emission - RF</b>											Code Systems HHU; FCC/IC
#	Freq. MHz	Ant. Used	Ant. Pol.	Pr dBm	Det. Used	Ka dB/m	Kg dB	E3* dBμV/m	E3lim dBμV/m	Pass dB	Comments
1	315.0	Dip	H	-10.2	Pk	18.6	21.2	74.3	75.6	<b>1.3</b>	flat
2	315.0	Dip	V	-15.9	Pk	18.6	21.2	68.6	75.6	7.0	side
3	630.0	Dip	H	-59.8	Pk	24.4	18.1	33.6	55.6	22.1	flat
4	630.0	Dip	V	-65.1	Pk	24.4	18.1	28.3	55.6	27.4	end
5	945.0	Dip	H	-71.5	Pk	28.8	16.1	28.3	55.6	27.3	flat
6	945.0	Dip	V	-68.6	Pk	28.8	16.1	31.2	55.6	24.4	end
7	1260.0	Horn	H	-44.3	Pk	20.6	28.1	35.3	54.0	18.7	flat
8	1575.0	Horn	H	-49.9	Pk	21.5	28.1	30.6	54.0	23.4	flat
9	1890.0	Horn	H	-41.7	Pk	22.2	28.1	39.5	55.6	16.1	side
10	2205.0	Horn	H	-39.1	Pk	23.0	26.5	44.5	54.0	9.5	side
11	2520.0	Horn	H	-47.0	Pk	23.9	26.0	38.0	55.6	17.7	flat
12	2835.0	Horn	H	-46.5	Pk	24.8	24.7	40.7	54.0	13.3	side
13	3150.0	Horn	H	-41.6	Pk	25.8	23.6	47.7	55.6	7.9	side
14											
15											
16											
17											
18	* Includes 19.9 dB duty factor										
19											
20											
21											
22											
23											
24											
25											
26											
27											
<b>Digital Radiated Emissions</b>											
#	Freq. kHz	Ant. Used	Ant. Pol.	Pr dBm	Det. Used	Ka dB/m	Kg dB	E3 dBμV/m	E3lim dBμV/m	Pass dB	Comments
1											
2											
3											
4	Digital emissions more than 20 dB below FCC/IC Class B Limit.										
5											
6											
7											
8											
9											

Meas. 09/06/2007; U of Mich.

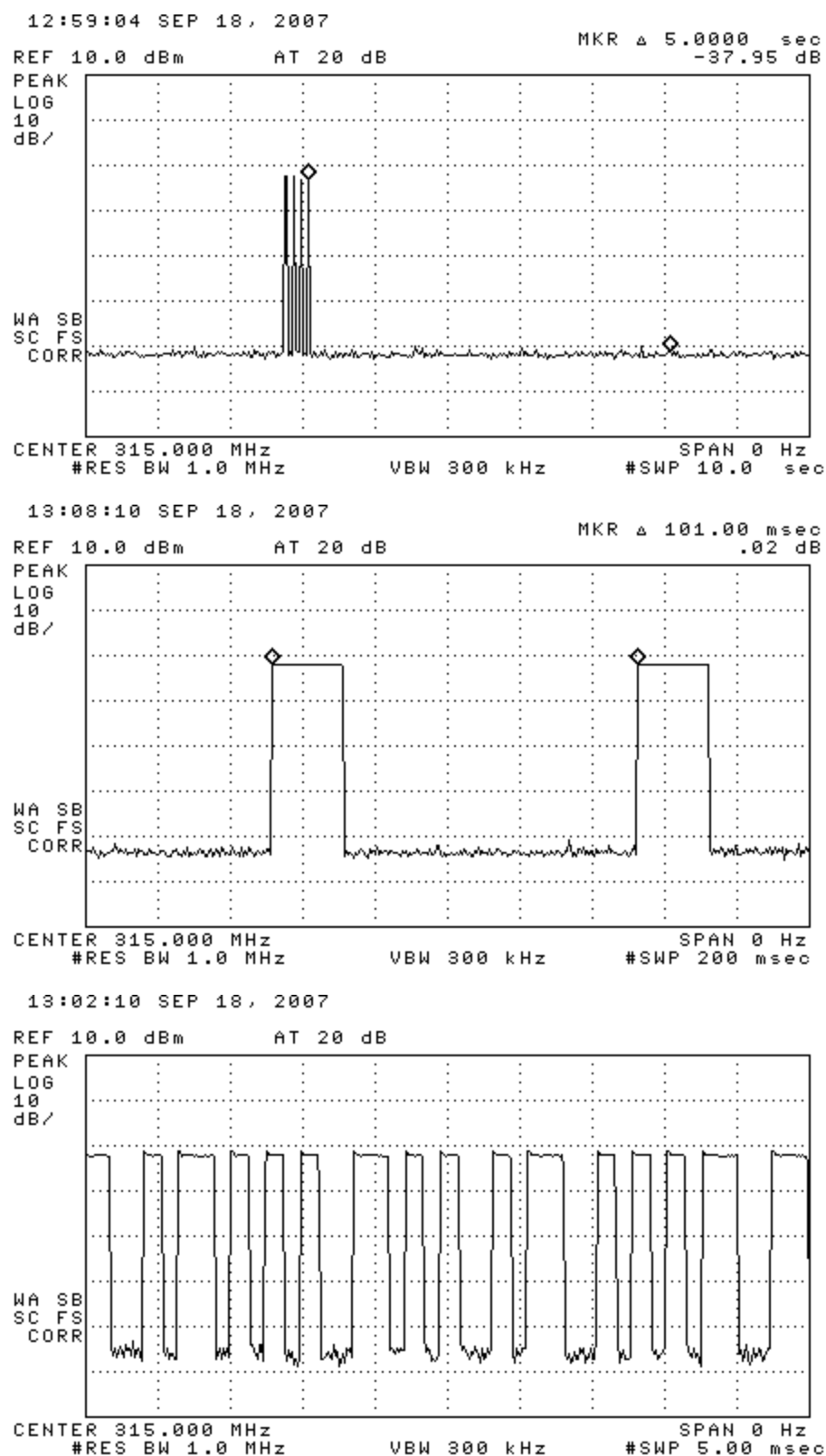


Figure 6.1(a). Transmissions modulation characteristics: (top) single button press, (center) expanded period, (bottom) expanded word.

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*FCC Part 15, IC RSS-210/Gen - Test Report No. 415031-382*

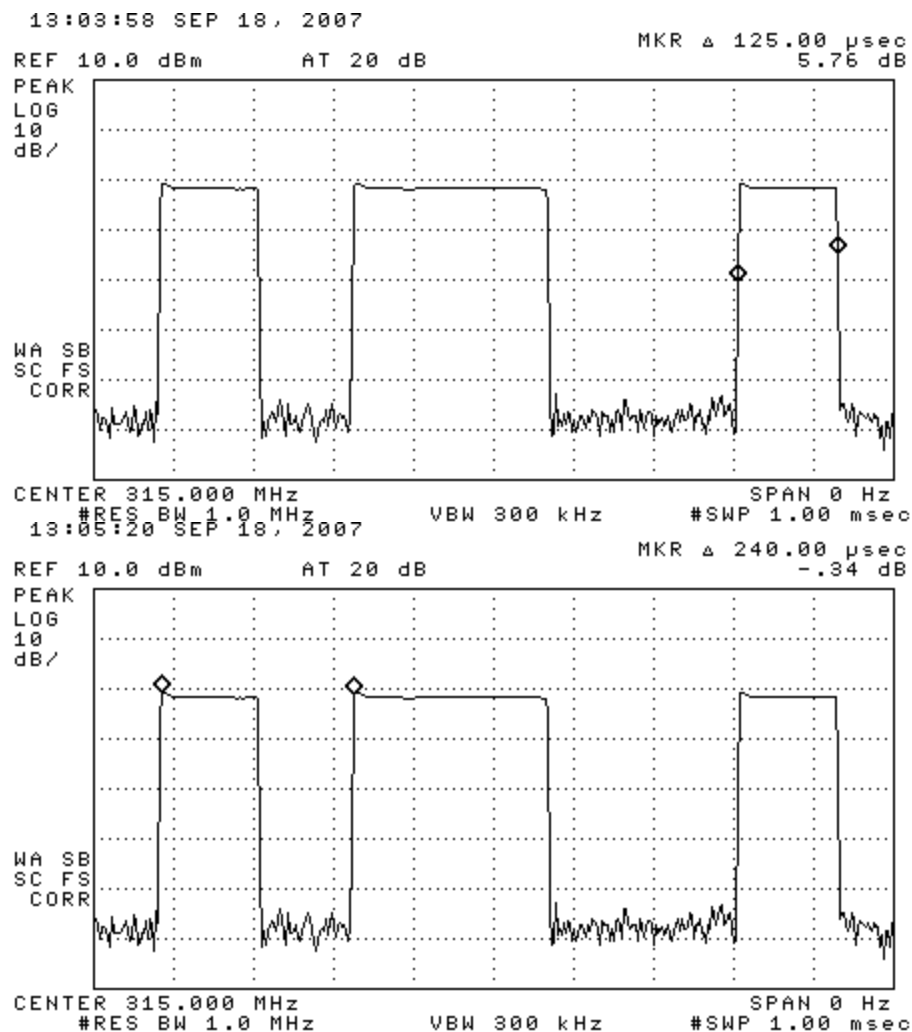


Figure 6.1(b). Manchester characteristics: (top) width, (bottom) period.

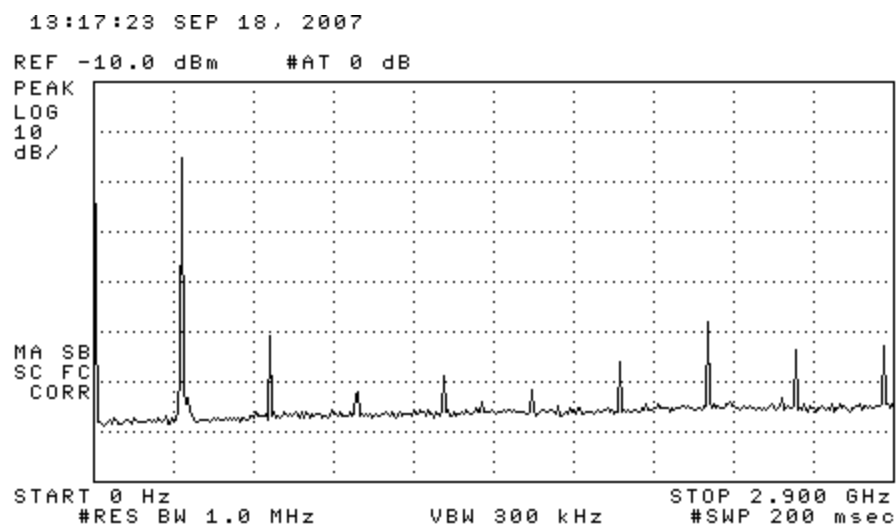


Figure 6.2. Emission spectrum of the DUT (pulsed emission).  
 The amplitudes are only indicative (not calibrated).



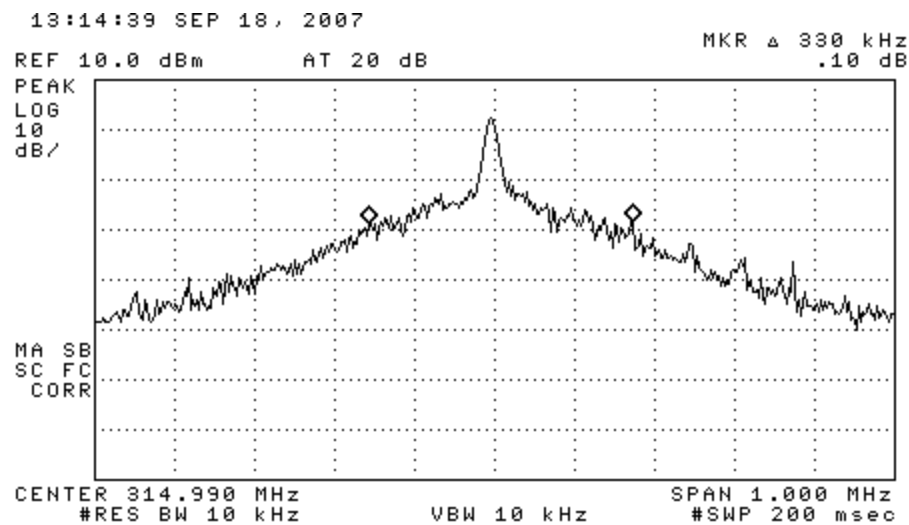


Figure 6.3. Measured bandwidth of the DUT (pulsed emission).

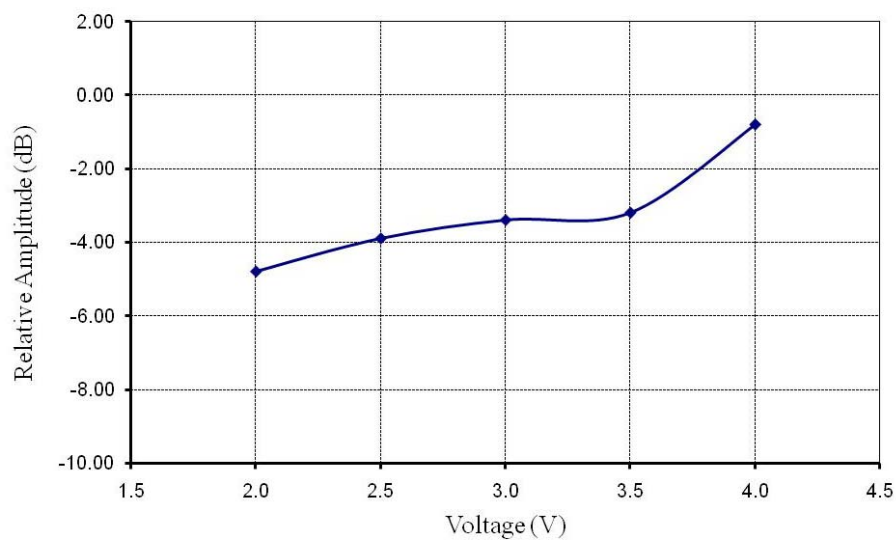


Figure 6.5. Relative emission at 315 MHz vs. supply voltage (pulsed emission).



DUT on OATS



DUT on OATS (close-up)