

4740 Discovery Drive | Lincoln, NE 68521 tel- 402.323.6233 | tel -888.657.6860 | fax - 402.323.6238 info@nceelabs.com | http://nceelabs.com

TNB Test Report

Class 2 Permissive Change

Prepared for: Garmin International Inc.

Address: 1200 E. 151st Street

Olathe, Kansas, 66062, USA

Product: A03302

Test Report No: R20190123-20-04C

Approved By:

Nic S. Johnson, NCE

Technical Manager

iNARTE Certified EMC Engineer #EMC-003337-NE

DATE: 16 May 2019

Total Pages: 12



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Revision Page

Report Number: R20190123-20C

Prepared for Garmin

| Rev. No. | Date | Description |
|----------|-------------|---|
| Original | 10 MAY 2019 | Original – Njohnson Prepared by KVepuri |
| А | 15 MAY 2019 | Removed irrelevant note under test methods on page 3. |
| | | Includes NCEE Labs report R20190123-20-04 and its amendment in fullNJ |
| В | 16 MAY 2019 | Updated spurious emissions at antenna terminals section |
| | | Includes NCEE Labs report R20190123-20- 04A and its amendment in fullNJ |
| С | 16 MAY 2019 | Removed spurious emissions from antenna terminals measurements because they were not relevant to this Class II permissive change application. |
| | | Corrected Part 25.212 references |
| | | Corrected unit for limit in Tables 1 and 2 |
| | | Includes NCEE Labs report R20190123-20- 04A and its amendment in fullNJ |

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1 Summary of Test Results

The following information is submitted for consideration in processing Class 2 Permissive Change (C2PC) to authorized equipment. The module model: A03302, was granted a module authorization operating under 47CFR part 25 and Industry Canada RSS-170 operations in the 1616.0-1626.5 MHz frequency band. This report presents documentation supporting a change in the PCB trace leading to the antenna. The new trace includes no active components.

The equipment under test (EUT) was tested for compliance to FCC Part 25 and Part 2 as well as RSS-170. Below is a summary of the test results. Complete results can be found in Section 3.

| Report Section | 47 CFR FCC Rule Part | Description | Result |
|----------------|------------------------------|---------------------|-----------|
| 3 | § 2.1046, §25.202 | Spurious emissions | Compliant |
| 3 | RSS-170 Issue 3, Section 5.4 | Power and emissions | Compliant |

Test Methods:

(1) ANSI C63.26-2015

2 EUT Description

The Equipment Under Test (EUT) was a battery-powered transceiver manufactured by GARMIN inc..

2.1 Equipment under Test (EUT)

| EUT | A03302 |
|----------------|---|
| EUT Received | 22 March 2019 |
| EUT Tested | 26 March 2019- 1 May 2019 |
| Serial No. | 3985900303bw00 (used for radiated tests); |
| Operating Band | 1616 MHz – 1626 MHz |
| Device Type | Iridium |
| Power Supply | Internal Battery/ Charger: Garmin (Phi Hong) MN: PSAI10R-050Q |

NOTE: For more detailed features description, please refer to the manufacturer's specifications or user's manual.

2.2 Testing Location

All testing was performed at the NCEE Lincoln facility, which is an A2LA accredited EMC test laboratory accredited per scope 1953.01.

2.3 EUT Setup

The EUT was powered by 5 VDC, internal Battery for all the tests

2.4 Test Equipment

| DESCRIPTION AND MANUFACTURER | MODEL NO. | SERIAL NO. | LAST CALIBRATION DATE | CALIBRATION DUE DATE |
|--|--------------|--------------|-----------------------------|-------------------------|
| Rohde & Schwarz Test Receiver | ES126 | 100037 | 30 Jan 2018 | 30 Jan 2020 |
| EMCO Biconilog Antenna | 3142B | 1647 | 02 Aug 2017 | 02 Aug 2019 |
| EMCO Horn Antenna | 3115 | 6416 | 26 Jan 2018 | 26 Jan 2020 |
| EMCO Horn Antenna | 3116 | 2576 | 31 Jan 2018 | 31 Jan 2020 |
| Rohde & Schwarz Preamplifier | TS-PR18 | 3545700803 | 09 Mar 2018* | 09 Mar 2020* |
| Trilithic High Pass Filter | 6HC330 | 23042 | 09 Mar 2018* | 09 Mar 2020* |
| Rohde & Schwarz LISN | ESH3-Z5 | 836679/010 | 26 Jul 2018 | 26 Jul 2019 |
| RF Cable (preamplifier to antenna) | MFR-57500 | 01-07-002 | 09 Mar 2018* | 09 Mar 2020* |
| RF Cable (antenna to 10m chamber bulkhead) | FSCM 64639 | 01E3872 | 09 Mar 2018* | 09 Mar 2020* |
| RF Cable (10m chamber bulkhead to control room bulkhead) | FSCM 64639 | 01E3874 | 09 Mar 2018* | 09 Mar 2020* |
| RF Cable (Control room bulkhead to RF switch) | FSCM 64639 | 01E3871 | 09 Mar 2018* | 09 Mar 2020* |
| RF Cable (RF switch to test receiver) | FSCM 64639 | 01F1206 | 09 Mar 2018* | 09 Mar 2020* |
| RF switch – Rohde and Schwarz | TS-RSP | 1113.5503.14 | 09 Mar 2018* | 09 Mar 2020* |
| N connector bulkhead (10m chamber) | PE9128 | NCEEBH1 | 09 Mar 2018* | 09 Mar 2020* |
| N connector bulkhead (control room) | PE9128 | NCEEBH2 | 09 Mar 2018* | 09 Mar 2020* |

^{*}Internal Characterization

Notes:

All equipment is owned by NCEE Labs and stored permanently at NCEE Labs facilities.

3 Test Results

Emissions Limitations Operation in the Band 1616.0-1626.5 MHz

Test: FCC Part 25.202, 2.1051, 2.1053

RSS-170, Clause 5.3

ANSI C63.26, Section 5.5, Annex B

Test Result: Complies Date: 6 May 2019

Test Description

25.202 Section 12(f) *Emission limitations*. Except for SDARS terrestrial repeaters and as provided for in paragraph (i), the mean power of emissions shall be attenuated below the mean output power of the transmitter in accordance with the schedule set forth in paragraphs (f)(1) through (f)(4) of this section. The out-of-band emissions of SDARS terrestrial repeaters shall be attenuated in accordance with the schedule set forth in paragraph (h) of this section.

Test Environment

Testing was performed at the NCEE Labs Lincoln facility. Laboratory environmental conditions varied slightly throughout the test:

Relative humidity of $35 \pm 5\%$ Temperature of $22 \pm 2^{\circ}$ C

Test Setup

The RF output of the transceiver was connected to a spectrum analyzer through appropriate attenuators. The spectrum analyzer was used to make power measurements using the channel power function. The resolution bandwidth was set to 1 MHz and the channel bandwidth was set to match the occupied bandwidth as measured in Section 3.3.

Spurious emissions were measured using a pre-test site path loss according to Section 5.5.4 and Annex B of ANSI C63.26.

Radiated emissions measurements were made from 9 kHz to 12.5 GHz at a distance of 3m inside a semi-anechoic chamber. The EUT was rotated 360°, the antenna height varied from 1 – 4 meters and both the vertical and horizontal antenna polarizations examined. The results were compared against the limits. Measurements were made by first using a spectrum analyzer to acquire the signal spectrum; individual frequencies were then measured using a CISPR 16.1 compliant receiver with the following bandwidth setting:

30MHz – 1GHz:120kHz IF bandwidth, 60kHz steps.

Limits were converted from EIRP to 3m field strength. Measurements were performed with a quasi-peak detector. Path loss was measured during ANSI C63.4-2014 Normalized Site Attenuation measurements.

Test Results

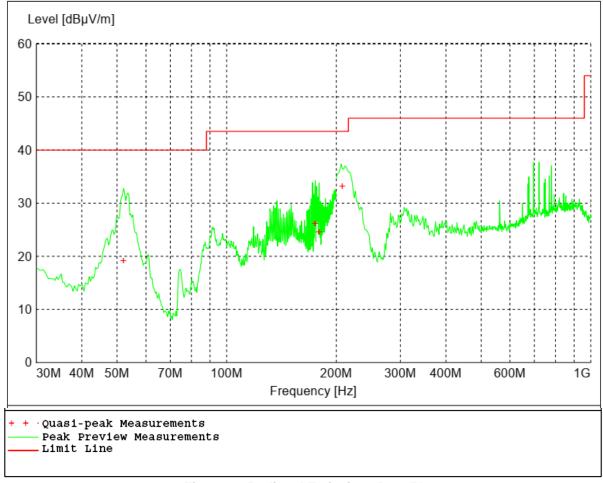


Figure 1 - Radiated Emissions Data Plot

All three channel were investigated and the channel with the highest emissions is shown for the 30 MHz – 1 GHz frequency range.

Table 1 - Radiated Emissions Measurements

| | Pre-test | Emission Power | | | | | | Channel |
|------------|----------|-----------------------|--------|--------|--------|-------|-----|---------|
| Frequency | Level | Level | Limit | Margin | Height | Angle | Pol | |
| MHz | dBμV/m | dBm | dBm | dB | cm. | deg. | | |
| 52.140000 | 19.16 | -76.07 | -13.00 | 63.07 | 100 | 193 | > | Mid |
| 175.140000 | 26.16 | -69.07 | -13.00 | 56.07 | 213 | 0 | Н | Mid |
| 179.400000 | 24.59 | -70.64 | -13.00 | 57.64 | 193 | 360 | Ι | Mid |
| 207.960000 | 33.29 | -61.94 | -13.00 | 48.94 | 138 | 0 | Н | Mid |

The EUT was maximized in all 3 orthogonal axis. The worst-case is shown in the table above.

Emission Power Level = Pre-test level – Path Loss (94.23 dB)

Table 2 - Radiated Emissions Peak Measurements

| | | Emission | | | | | | Channel |
|-------------|--------|----------------|--------|--------|--------|-------|------|---------|
| Frequency | Level | Power Level | Limit | Margin | Height | Angle | Pol | |
| MHz | dBμV/m | dBm | dBm | dB | cm. | deg. | 101 | |
| 1616.400000 | 125.82 | 30.59 | NA | NA | 168 | 218 | VERT | Low |
| 1620.970000 | 125.94 | 30.71 | NA | NA | 168 | 218 | VERT | Mid |
| 1625.970000 | 126.18 | 30.95 | NA | NA | 168 | 218 | VERT | High |
| 3242.000000 | 57.77 | -37.46 | -13.00 | 24.46 | 174 | 218 | V | Mid |
| 3232.000000 | 58.43 | -36.80 | -13.00 | 23.80 | 171 | 197 | Н | Low |
| 3252.000000 | 57.71 | -37.52 | -13.00 | 24.52 | 177 | 22 | Н | high |

No other signals were detected above system sensitivity

Requirement from FCC Part 25.216

(c) The e.i.r.p. density of emissions from mobile earth stations placed in service after July 21, 2002 with assigned uplink frequencies between 1610 MHz and 1660.5 MHz shall not exceed −70 dBW/MHz, averaged over any 2 millisecond active transmission interval, in the band 1559-1605 MHz. The e.i.r.p. of discrete emissions of less than 700 Hz bandwidth from such stations shall not exceed −80 dBW, averaged over any 2 millisecond active transmission interval, in the 1559-1605 MHz band.

Measurements according to FCC Part 25.212(c)

Average measurements

1616.0208033 MHz

| 1010.0200033 191112 | | | | |
|---------------------|-----------------|--------|----------|--|
| Frequency | Level (EIRP) | Limit | Margin | |
| MHz | dBW | dBW | dB | |
| 1559 | -100.998 | -80.00 | 20.99789 | |
| 1582 | -101.202 | -80.00 | 21.20222 | |
| 1605 | -101.305 | -80.00 | 21.30482 | |

1621 0208033 MHz

| 1021.U2U6U33 WITZ | | | | |
|-------------------|-----------------|--------|----------|--|
| Frequency | Level (EIRP) | Limit | Margin | |
| MHz | dBW | dBW | dB | |
| 1559 | -101.034 | -80.00 | 21.03399 | |
| 1582 | -102.169 | -80.00 | 22.16928 | |
| 1605 | -100.058 | -80.00 | 20.05779 | |

1625.979167 MHz

| Frequency | Level (EIRP) | Limit | Margin |
|-----------|-----------------|--------|----------|
| MHz | dBW | dBW | dB |
| 1559 | -101.178 | -80.00 | 21.17777 |
| 1582 | -102.533 | -80.00 | 22.53251 |
| 1605 | -100.853 | -80.00 | 20.85254 |

(g) <first section of paragraph removed because power density measurements are not applicable to permissive change validation>

...The e.i.r.p of discrete emissions of less than 700 Hz bandwidth from such stations shall not exceed a level determined by linear interpolation from -80 dBW at 1605 MHz to -20 dBW at 1610 MHz, averaged over any 2 millisecond active transmission interval.

Measurements according to FCC Part 25.212 (g)

Peak measurements

1616.0208033 MHz

| _ | | | |
|-----------|--------|--------|--------|
| Frequency | Level | Limit | Margin |
| MHz | dBW | dBW | dB |
| 1605 | -80.28 | -80.00 | 0.28 |
| 1606 | -80.57 | -68.00 | 12.57 |
| 1607 | -81.46 | -56.00 | 25.46 |
| 1608 | -81.56 | -44.00 | 37.56 |
| 1609 | -81.13 | -32.00 | 49.13 |
| 1610 | -81.38 | -20.00 | 61.38 |

1621.0208033 MHz

| 1021.0200033 WITTE | | | | | | |
|--------------------|--------|--------|--------|--|--|--|
| Frequency | Level | Limit | Margin | | | |
| MHz | dBW | dBW | dB | | | |
| 1605.00 | -80.82 | -80.00 | 0.82 | | | |
| 1606.00 | -79.49 | -68.00 | 11.49 | | | |
| 1607.00 | -81.59 | -56.00 | 25.59 | | | |
| 1608.00 | -80.17 | -44.00 | 36.17 | | | |
| 1609.00 | -80.31 | -32.00 | 48.31 | | | |
| 1610.00 | -79.37 | -20.00 | 59.37 | | | |
| | | | | | | |

1625.979167 MHz

| Frequency | Level | Limit | Margin |
|-----------|--------|--------|--------|
| MHz | dBW | dBW | dB |
| 1605.00 | -80.70 | -80.00 | 0.70 |
| 1606.00 | -80.00 | -68.00 | 12.00 |
| 1607.00 | -81.86 | -56.00 | 25.86 |
| 1608.00 | -81.05 | -44.00 | 37.05 |
| 1609.00 | -80.41 | -32.00 | 48.41 |
| 1610.00 | -78.89 | -20.00 | 58.89 |

Note:

the limits shown are for discrete emissions of less than 700 Hz bandwidth according to FCC Part 25.212(g). The bandwidth of the emissions was not measured, so the lowest limits were used. For FCC Part 25.212(g) the limits are 10 dB higher, so the margins would increase by 10 dB. These measurements are intended to show compliance with both parts using the lowest limit.

Resolution bandwidth of 1 MHz was used for all Part 25.216 measurements. The EMI receiver was set to scan across the band in 500 kHz steps using peak or average detector as stated.

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Annex A – Sample Field Strength Calculation

Radiated Emissions

The field strength is calculated in decibels (dB) by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = R + AF - (-CF + AG)$$

where FS = Field Strength

R = Receiver Amplitude Receiver reading in dBµV

AF = Antenna Factor

CF = Cable Attenuation Factor

AG = Preamplifier Amplifier Gain

Assume a receiver reading of $55.00~dB_{\mu}V$ is obtained. The Antenna Factor of 12.00 and a Cable Factor of 1.10 is added. The Amplifier Gain of 20 dB is subtracted, giving a field strength of $48.10~dB_{\mu}V/m$.

$$FS = 55.00 + 12.00 - (-1.10 + 20.00) = 48.1 dB\mu V/m$$

The 48.1 dB μ V/m value can be mathematically converted to its corresponding level in μ V/m.

Level in μ V/m = Common Antilogarithm [(48.1 dB μ V/m)/20] = 254.1 μ V/m

Annex B – Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been for tests performed in this test report:

| Test | Frequency Range | Uncertainty Value (dB) |
|------------------------|-----------------|------------------------|
| Radiated Emissions, 3m | 30MHz - 1GHz | 3.82 |
| Radiated Emissions, 3m | 1GHz - 18GHz | 4.44 |

Expanded uncertainty values are calculated to a confidence level of 95%.