

# Application For Grant of Certification

Model: A03304 2402-2480 MHz 47CFR 15.249 and RSS-210 Low Power Transmitter

> FCC ID: IPH-03304 IC: 1792A-03304

> > FOR

## Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

FCC Designation: US5305, Registration number: 315994 IC Test Site Registration: 3041A-1 Test Report Number: 170720

Authorized Signatory: Scot D. Rogers

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03304 Test #: 170720 Test to: CFR47 15C, RSS-Gen, RSS-210 File: A03304 TstRpt 170720 SN's: ENG1 / ENG2 FCC ID: IPH-03304 IC: 1792A-03304 Date: November 21, 2017 Page 1 of 30





ROGERS LABS, INC.

4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone / Fax (913) 837-3214

## Engineering Test Report For Grant of Certification Application

FOR

47 CFR, PART 15C - Intentional Radiators Paragraph 15.249 and Industry Canada RSS-210 Issue 9, RSS-GEN Issue 4 License Exempt Intentional Radiator

For

## Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

Model: A03304

Low Power Transmitter Frequency Range 2402-2480 MHz FCC ID#: IPH-03304 IC: 1792A-03304

Test Date: July 20, 2017

Certifying Engineer:

Scot DRogers

Scot D. Rogers Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Telephone/Facsimile: (913) 837-3214

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Rogers Labs, Inc.Garmin International, Inc.SN's: ENG1 / ENG24405 West 259th TerraceModel: A03304FCC ID: IPH-03304Louisburg, KS 66053Test #: 170720IC: 1792A-03304Phone/Fax: (913) 837-3214Test to: CFR47 15C, RSS-Gen, RSS-210Date: November 21, 2017Revision 1File: A03304 TstRpt 170720Page 2 of 30



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| Rogers Labs, Inc.<br>4405 West 259 <sup>th</sup> Terrace<br>Louisburg, KS 66053<br>Phone/Fax: (913) 837-3214<br>Revision 1 | Garmin International, Inc.<br>Model: A03304<br>Test #: 170720<br>Test to: CFR47 15C, RSS-Gen, RSS-210<br>File: A03304 TstRpt 170720 | SN's: ENG1 / ENG2<br>FCC ID: IPH-03304<br>IC: 1792A-03304<br>Date: November 21, 2017<br>Page 3 of 30 |



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#### Revisions

Revision 1 Issued November 21, 2017

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
| 4405 West 259 <sup>th</sup> Terrace | Model: A03304                        | FCC ID: IPH-03304       |
| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
| Phone/Fax: (913) 837-3214           | Test to: CFR47 15C, RSS-Gen, RSS-210 | Date: November 21, 2017 |
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#### Foreword

The following information is submitted for consideration in obtaining Grant of Certification for low power intentional radiator per 47 CFR Paragraph 15.249, Industry Canada RSS-210 Issue 9 and RSS-GEN Issue 4, low power digital device transmitter operations in the 2400 – 2483.5 MHz frequency band.

| Name of Applican | t: Garmin International, Inc.<br>1200 East 151st Street<br>Olathe, KS 66062 |
|------------------|---|
| M/N: A03304      | HVID: A03304  |

FCC ID: IPH-03304 IC: 1792A-03304

Operating power: 2402-2480 MHz Maximum Average power ANT 84.9 dB $\mu$ V/m @ 3 meters, BLE 85.0 dB $\mu$ V/m @ 3, (and peak 90.2 dB $\mu$ V/m @ 3 meters), [99% OBW, ANT 1022.5 kHz, BLE 1,072.5 kHz]

#### **Opinion / Interpretation of Results**

| Tests Performed                                   | Margin (dB) | Results  |
|---|-------------|----------|
| Restricted Bands 47CFR 15.205, RSS-210 2.2        | -10.8       | Complies |
| AC Line Conducted 47CFR 15.207, RSS-GEN 8.8       | N/A         | Complies |
| Radiated Emissions 47CFR 15.209, RSS-GEN 8.9      | -8.1        | Complies |
| Harmonic Emissions per 47CFR 15.249, RSS-210 A2.9 | -10.8       | Complies |

#### **Equipment Tested**

| <u>Equipment</u> | Model / PN | Serial Number |  |  |
|------------------|------------|---------------|--|--|
| EUT #1           | A03304     | ENG1          |  |  |
| EUT #2           | A03304     | ENG2          |  |  |

Test results in this report relate only to the items tested.

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
| 4405 West 259 <sup>th</sup> Terrace | Model: A03304                        | FCC ID: IPH-03304       |
| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
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|                                     |                                      |                         |

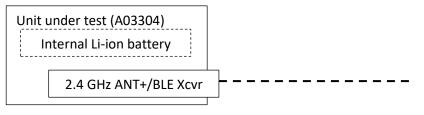


#### **Equipment Function**

The EUT is a portable digital device. The device incorporates sensors to log movement, activity and other functions, and includes low power transmitter function for communications with compatible equipment. The design offers no other interface options as described by the manufacture than those presented below in the configuration diagram. The low power transmitter provides operation capability in the 2402-2480 MHz frequency band. The design provides wireless communications in one of two modes (mode 1 ANT, mode 2, BlueTooth<sup>®</sup>) providing wireless interface capabilities with compatible equipment. The product operates from internal replaceable battery only and offers no provision for alternate power sources. The design utilizes internal fixed antenna system and offers no provision for antenna replacement or modification. Two samples were provided for testing, one representative of production design, and the other modified for testing purposes replacing integral antenna with RF connection port. The test samples were provided with test software enabling testing personnel the ability to enable transmitter functions on defined channels. The antenna modification offered testing facility ability to connect test equipment to the temporary antenna port for antenna port conducted emission testing. The EUT was arranged as described by the manufacturer emulating typical user configurations for testing purposes. For testing purposes, the EUT received powered from freshly charged internal battery and configured to operate in available modes. As requested by the manufacturer and required by regulations, the equipment was tested for emissions compliance using the available configurations with the worst-case data presented. The test software enabled the transmitter to operate near 100% duty cycle for testing purposes. The production product will not operate at these high duty cycles. This report documents compliance testing and results for applicable product modes of operation. Test results in this report relate only to the products described in this report.

#### **Equipment Configuration**

Unit powered by internal battery transmitting ANT+/BLE wireless data @ 2.4 GHz



Rogers Labs, Inc.Garmin4405 West 259th TerraceModeLouisburg, KS 66053Test #Phone/Fax: (913) 837-3214Test toRevision 1File: A

Garmin International, Inc. Model: A03304 Test #: 170720 Test to: CFR47 15C, RSS-Gen, RSS-210 File: A03304 TstRpt 170720 SN's: ENG1 / ENG2 FCC ID: IPH-03304 IC: 1792A-03304 Date: November 21, 2017 Page 6 of 30



#### **Application for Certification**

| •••  |   |   |   |
|------|---|---|---|
| (1)  | Manufacturer:                                 | Garmin International                            | , Inc.  |
|      |   | 1200 East 151st Stree                           | et  |
|      |   | Olathe, KS 66062                                |   |
| (2)  | Identification:                               | M/N: A03304                                     | HVIN: A03304  |
|      | FCC ID: IPH-03304                             | IC: 1792A-0                                     | 3304  |
| (3)  | Instruction Book:                             |   |   |
|      | Refer to Exhibit for Ir                       | struction Manual.                               |   |
| (4)  | Description of Circuit                        | Functions:                                      |   |
|      | Refer to Exhibit of O                         | perational Description.                         |   |
| (5)  | Block Diagram with I                          | Frequencies:                                    |   |
|      | Refer to Exhibit of O                         | perational Description                          | 1.  |
| (6)  | Report of Measureme                           | nts:  |   |
|      | Report of measureme                           | nts follows in this Rep                         | ort.  |
| (7)  | Photographs: Constru                          | ction, Component Pla                            | cement, etc.:   |
|      | Refer to Exhibit for p                        | hotographs of equipme                           | nt.   |
| (8)  | current power provide                         | ed from internal replac                         | operation. The equipment operates from direct<br>eable battery only. The EUT offers no other<br>presented in this filing.   |
| (9)  | Transition Provisions                         | of CFR47 15.37 are                              | not requested.  |
| (10) | Not Applicable. The                           | unit is not a scanning r                        | eceiver.  |
| (11) | Not Applicable. The                           | EUT does not operate                            | e in the 59 – 64 GHz frequency band.  |
| (12) | The equipment is not                          | software defined and                            | this section is not applicable.   |
| (13) | GHz bands must incl<br>that control the radio | ude a high-level opera<br>frequency operating p | ices in the 5.15-5.35 GHz and the 5.47-5.85<br>tional description of the security procedures<br>parameters and ensure that unauthorized<br>ement is not applicable to his DTS device. |
| (14) | required types of test                        | s applicable to the dev                         | showing the test set-up for each of the<br>vice for which certification is requested. These<br>h detail to confirm other information  |

n is requested. These nformation contained in the test report. Any photographs used must be focused originals without glare or dark spots and must clearly show the test configuration used. This information is provide in this report and Test Setup Exhibits provided with the application filing.

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#### **Applicable Standards & Test Procedures**

In accordance with the Federal Communications Code of Federal Regulations, dated July 20, 2017: Part 2, Subpart J, Paragraphs 2.907, 2.911, 2.913, 2.925, 2.926, 2.1031 through 2.1057, and applicable parts of paragraph 15, Part 15C Paragraph 15.249, Industry Canada RSS-210 issue 9, and RSS-GEN issue 4 operation in the 2400 – 2483.5 MHz Frequency band. Test procedures used are the established Methods of Measurement of Radio-Noise Emissions as described in ANSI C63.10-2013.

#### **Equipment Testing Procedures**

#### AC Line Conducted Emission Test Procedure

The EUT operates solely from direct current power supplied from replaceable batteries. Therefore, no AC line conducted emissions testing was required or performed.

#### Radiated Emission Test Procedure

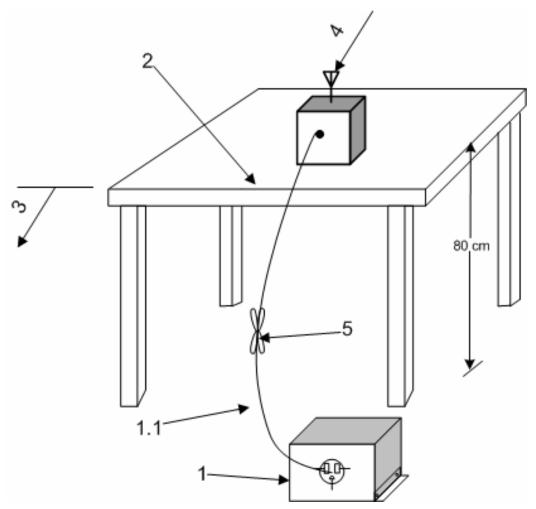
The EUT was placed on a rotating 0.9 x 1.2-meter platform, elevated as required above the ground plane at a distance of 3 meters from the FSM antenna. Radiated emissions testing was performed as required in the regulations and specified in ANSI C63.10-2013. EMI energy was maximized by equipment placement permitting orientation in three orthogonal axes, raising and lowering the FSM antenna, changing the antenna polarization, and by rotating the turntable. Each emission was maximized before data was taken and recorded. The frequency spectrum from 9 kHz to 25,000 MHz was searched for emissions during preliminary investigation. Refer to diagrams one and two showing typical test setup. Refer to photographs in the test setup exhibits for specific EUT placement during testing.

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1—A LISN is optional for radiated measurements between 30 MHz and 1000 MHz but not allowed for measurements below 30 MHz and above 1000 MHz (see 6.3.1). If used, then connect EUT to one LISN. Unused LISN measuring port connectors shall be terminated in 50  $\Omega$  loads. The LISN may be placed on top of, or immediately beneath, the reference ground plane (see 6.2.2 and 6.2.3.2).

1.1—LISN spaced at least 80 cm from the nearest part of the EUT chassis.

2—Antenna can be integral or detachable, depending on the EUT (see 6.3.1).

3—Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long (see 6.3.1).

4—For emission measurements at or below 1 GHz, the table height shall be 80 cm. For emission measurements above 1 GHz, the table height shall be 1.5 m for measurements, except as otherwise specified (see 6.3.1 and 6.6.3.1).

#### Diagram 1 Test arrangement for radiated emissions of tabletop equipment

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
| 4405 West 259 <sup>th</sup> Terrace | Model: A03304                        | FCC ID: IPH-03304       |
| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
| Phone/Fax: (913) 837-3214           | Test to: CFR47 15C, RSS-Gen, RSS-210 | Date: November 21, 2017 |
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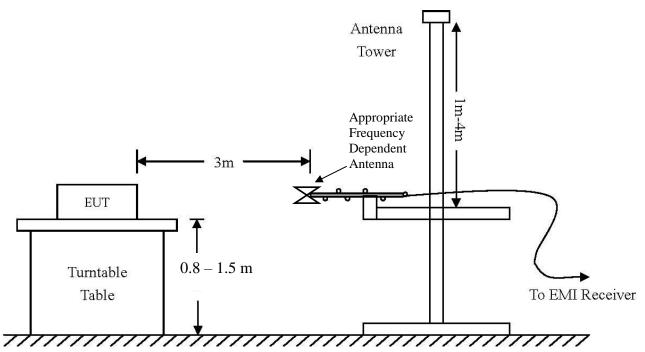


Diagram 2 Test arrangement for radiated emissions tested on Open Area Test Site (OATS)

#### **Test Site Locations**

| Conducted EMI      | The AC power line conducted emissions testing performed in a shielded   |
|--------------------|---|
|                    | screen room located at Rogers Labs, Inc., 4405 West 259th Terrace,      |
|                    | Louisburg, KS   |
| Radiated EMI       | The radiated emissions tests were performed at the 3 meters, Open Area  |
|                    | Test Site (OATS) located at Rogers Labs, Inc., 4405 West 259th Terrace, |
|                    | Louisburg, KS   |
| Site Registration  | Refer to Annex for Site Registration Letters                            |
| NVLAP Accreditatio | n Lab code 200087-0   |

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
| 4405 West 259 <sup>th</sup> Terrace | Model: A03304                        | FCC ID: IPH-03304       |
| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
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#### **List of Test Equipment**

A Rohde and Schwarz ESU40 and/or Hewlett Packard 8591EM was used as the measuring device for the emissions testing of frequencies below 1 GHz. A Rohde and Schwarz ESU40 and/or Hewlett Packard 8562A Spectrum Analyzer was used as the measuring device for testing the emissions at frequencies above 1 GHz. The analyzer settings used are described in the following table. Refer to the appendix for a complete list of test equipment.

| Ī   | AC Line Conducted Emissions (0.150 -30 MHz) |                     |   |                          |   |                            | Ī        |           |
|---|---|---------------------|---|--------------------------|---|----------------------------|----------|-----------|
| ľ   | RBW   |                     |   | AVG. BW                  | Detector Function   |                            | n        |           |
|   |   | 9 kHz               |   | 30 kHz                   | Peak /  | Quasi Pea                  | k        |           |
|   |   |                     |   | Emissions (30-1000 MHz)  |   |                            |          |           |
|   |   | RBW                 |   | AVG. BW                  |   | or Functio                 |          |           |
|   | 1   | 20 kHz              |   | 300 kHz                  |   | Quasi Pea                  | k        |           |
|   |   |                     | E   | missions (Above 1000 MHz | ,<br>   |                            |          |           |
| ŀ   |   | RBW                 |   | Video BW                 |   | or Functio                 | n        |           |
|   |   | 00 kHz              |   | 100 kHz                  |   | Peak                       |          |           |
| l   |   | 1 MHz               |   | 1 MHz                    | Реак  | / Average                  |          | l         |
| Eq  | <u>uipment</u>                              | Manufacturer        |   | Model (SN)               | Band  | <u>Cal Dat</u>             | te D     | <u>ue</u> |
|   | LISN  | FCC FCC             | C-LIS   | SN-50-2-10(1PA) (160611) | .15-30MHz   | 5/17                       | 5/       | 18        |
| $\boxtimes$   | Cable                                       | Time Microwa        | ive   | 750HF290-750 (L10M)      | 9kHz-40 GH  | z 10/16                    | 10       | )/17      |
|   | Cable                                       | Belden              |   | RG-58 (L1-CAT3-11509)    | 9kHz-30 MH  | [z 10/16                   | 10       | )/17      |
|   | Cable                                       | Belden              |   | RG-58 (L2-CAT3-11509)    | 9kHz-30 MH  | [z 10/16                   | 10       | )/17      |
|   | Antenna                                     | ARA                 |   | BCD-235-B (169)          | 20-350MHz   | 10/16                      | 10       | )/17      |
|   | Antenna                                     | EMCO                |   | 3147 (40582)             | 200-1000MH  | Iz 10/16                   | 10       | )/17      |
| $\boxtimes$   | Antenna                                     | ETS-Lindgren        |   | 3117 (200389)            | 1-18 GHz  | 5/17                       | 5/       | 18        |
|   | Antenna                                     | Com Power           |   | AH-118 (10110)           | 1-18 GHz  | 10/15                      | 10       | )/17      |
| $\boxtimes$   | Antenna                                     | Com Power           |   | AH-840 (101046)          | 18-40 GHz   | 5/17                       | 5/       | 18        |
| $\boxtimes$   | Antenna                                     | Com Power           |   | AL-130 (121055)          | .001-30 MHz   | z 10/16                    | 10       | )/17      |
| $\square$   | Antenna                                     | Sunol               |   | JB-6 (A100709)           | 30-1000 MH  | z 10/16                    | 10       | )/17      |
|   | Antenna                                     | EMCO                |   | 3143 (9607-1277)         | 20-1200 MH  | z 5/17                     | 5/       | 18        |
|   | Analyzer                                    | HP                  |   | 8591EM (3628A00871)      | 9kHz-1.8GH  | z 5/17                     | 5/       | 18        |
|   | Analyzer                                    | HP                  |   | 8562A (3051A05950)       | 9kHz-110GF  | Iz 5/17                    | 5/       | 18        |
|   | Analyzer                                    | HP External M       | lixer   | s11571, 11970            | 25GHz-1100  | GHz5/17                    | 5/       | 18        |
| $\square$   | Analyzer                                    | Rohde & Schv        | varz  | ESU40 (100108)           | 20Hz-40GHz  | z 5/17                     | 5/       | 18        |
| $\square$   | Amplifier                                   | Com-Power           |   | PA-010 (171003)          | 100Hz-30MI  | Hz 10/16                   | 10       | )/17      |
| $\square$   | Amplifier                                   | Com-Power           |   | CPPA-102 (01254)         | 1-1000 MHz  | 10/16                      | 10       | )/17      |
| $\boxtimes$   | Amplifier                                   | Com-Power           |   | PAM-118A (551014)        | 0.5-18 GHz  | 10/16                      | 10       | )/17      |
|   | Power Met                                   | er Agilent          |   | N1911A with N1921A       | 0.05-18 GHz   | 5/17                       | 5/       | 18        |
| Rogers Labs, Inc.Gar4405 West 259th TerraceMoLouisburg, KS 66053TesPhone/Fax: (913) 837-3214Tes |   | Moo<br>Test<br>Test | min International, Inc.<br>del: A03304<br>t #: 170720<br>t to: CFR47 15C, RSS-Gen<br>: A03304 TstRpt 170720 | , RSS-210                | SN's: EN<br>FCC ID: I<br>IC: 1792A<br>Date: Nov<br>Page 11 or | PH-033<br>-03304<br>rember | 304<br>1 |           |



#### Units of Measurements

| Conducted EMI  | Data is in $dB\mu V$ ; $dB$ referenced to one microvolt               |  |
|--|---|--|
| Radiated EMI   | Data is in $dB\mu V/m$ ; $dB/m$ referenced to one microvolt per meter |  |
| Sample Calculation:  |   |  |
| RFS = Radiated Field Strength, FSM = Field Strength Measured |   |  |

A.F. = Receive antenna factor, Gain = amplification gains and/or cable losses RFS  $(dB\mu V/m @ 3m) = FSM (dB\mu V) + A.F. (dB) - Gain (dB)$ 

#### **Environmental Conditions**

| Ambient Temperature  | 23.1° C   |
|----------------------|-----------|
| Relative Humidity    | 46%       |
| Atmospheric Pressure | 1020.5 mb |

#### Statement of Modifications and Deviations

No modifications to the EUT were required for the equipment to demonstrate compliance with the CFR47 Part 15C, Industry Canada RSS-210 Issue 9, and RSS-GEN emission requirements. There were no deviations to the specifications.

#### Intentional Radiators

The following information is submitted in support demonstration of compliance with the requirements of 47CFR, Subpart C, paragraph 15.249, Industry Canada RSS-210 Issue 9 and **RSS-GEN** Issue 4.

#### Antenna Requirements

The EUT incorporates integral antenna system. Production equipment offers no provision for connection to alternate antenna system. The antenna connection point complies with the unique antenna connection requirements. There are no deviations or exceptions to the specification.

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Revision 1

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#### **Restricted Bands of Operation**

Spurious emissions falling in the restricted frequency bands of operation were measured at the OATS. The EUT utilizes frequency, determining circuitry, which generates harmonics falling in the restricted bands. Emissions were investigated at the OATS, using appropriate antennas or pyramidal horns, amplification stages, and a spectrum analyzer. Peak and average amplitudes of frequencies above 1000 MHz were compared to the required limits with worst-case data presented below. Test procedures of ANSI C63.10-2013 were used during testing. No other significant emission was observed which fell into the restricted bands of operation. Computed emission values take into account the received radiated field strength, receive antenna correction factor, amplifier gain stage, and test system cable losses.

| Frequency<br>in MHz | Horizontal<br>Peak<br>(dBµV/m) | Horizontal<br>Quasi-Peak<br>(dBµV/m) | Horizontal<br>Average<br>(dBµV/m) | Vertical<br>Peak<br>(dBµV/m) | Vertical<br>Quasi-Peak<br>(dBµV/m) | Vertical<br>Average<br>(dBµV/m) | Limit @ 3m<br>(dBµV/m) |
|---------------------|--------------------------------|--------------------------------------|-----------------------------------|------------------------------|------------------------------------|---------------------------------|------------------------|
| 2390.0              | 41.9                           | N/A                                  | 28.8                              | 41.6                         | N/A                                | 28.8                            | 54.0                   |
| 2483.5              | 44.2                           | N/A                                  | 29.4                              | 47.8                         | N/A                                | 30.6                            | 54.0                   |
| 4804.0              | 47.6                           | N/A                                  | 38.0                              | 52.5                         | N/A                                | 43.2                            | 54.0                   |
| 4884.0              | 45.4                           | N/A                                  | 35.1                              | 52.1                         | N/A                                | 42.5                            | 54.0                   |
| 4960.0              | 46.3                           | N/A                                  | 34.8                              | 38.2                         | N/A                                | 31.3                            | 54.0                   |
| 7206.0              | 45.4                           | N/A                                  | 33.0                              | 46.4                         | N/A                                | 34.3                            | 54.0                   |
| 7326.0              | 45.7                           | N/A                                  | 32.6                              | 48.6                         | N/A                                | 38.2                            | 54.0                   |
| 7440.0              | 46.5                           | N/A                                  | 34.0                              | 35.0                         | N/A                                | 32.8                            | 54.0                   |
| 12010.0             | 48.3                           | N/A                                  | 35.6                              | 48.3                         | N/A                                | 35.6                            | 54.0                   |
| 12210.0             | 49.7                           | N/A                                  | 36.9                              | 50.0                         | N/A                                | 36.6                            | 54.0                   |
| 12400.0             | 49.8                           | N/A                                  | 36.6                              | 36.6                         | N/A                                | 37.0                            | 54.0                   |

 Table 1 Radiated Emissions in Restricted Frequency Bands Data (ANT Worst-case)

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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| Frequency<br>in MHz | Horizontal<br>Peak<br>(dBµV/m) | Horizontal<br>Quasi-Peak<br>(dBµV/m) | Horizontal<br>Average<br>(dBµV/m) | Vertical<br>Peak<br>(dBµV/m) | Vertical<br>Quasi-Peak<br>(dBµV/m) | Vertical<br>Average<br>(dBµV/m) | Limit @ 3m<br>(dBµV/m) |
|---------------------|--------------------------------|--------------------------------------|-----------------------------------|------------------------------|------------------------------------|---------------------------------|------------------------|
| 2390.0              | 41.3                           | N/A                                  | 28.5                              | 42.0                         | N/A                                | 28.8                            | 54.0                   |
| 2483.5              | 42.9                           | N/A                                  | 29.2                              | 48.4                         | N/A                                | 31.1                            | 54.0                   |
| 4804.0              | 47.0                           | N/A                                  | 35.5                              | 52.3                         | N/A                                | 42.0                            | 54.0                   |
| 4884.0              | 47.1                           | N/A                                  | 36.4                              | 52.7                         | N/A                                | 41.4                            | 54.0                   |
| 4960.0              | 46.1                           | N/A                                  | 33.9                              | 49.8                         | N/A                                | 39.2                            | 54.0                   |
| 7206.0              | 44.3                           | N/A                                  | 31.8                              | 46.3                         | N/A                                | 34.5                            | 54.0                   |
| 7326.0              | 46.5                           | N/A                                  | 34.4                              | 45.0                         | N/A                                | 32.5                            | 54.0                   |
| 7440.0              | 46.2                           | N/A                                  | 33.6                              | 45.3                         | N/A                                | 32.4                            | 54.0                   |
| 12010.0             | 48.7                           | N/A                                  | 35.6                              | 48.4                         | N/A                                | 35.5                            | 54.0                   |
| 12210.0             | 49.2                           | N/A                                  | 36.8                              | 49.1                         | N/A                                | 36.6                            | 54.0                   |
| 12400.0             | 49.0                           | N/A                                  | 36.6                              | 49.6                         | N/A                                | 36.5                            | 54.0                   |

 Table 2 Radiated Emissions in Restricted Frequency Bands Data (BT Worst-case)

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

#### Summary of Results for Radiated Emissions in Restricted Bands

The EUT demonstrated compliance with the radiated emissions requirements of 47CFR Part 15C and RSS-210 Intentional Radiator requirements. The EUT ANT mode demonstrated a worst-case minimum margin of -10.8 dB below the emissions requirements in restricted frequency bands. The EUT BT mode demonstrated a worst-case minimum margin of -12.0 dB below the emissions requirements in restricted frequency bands. Peak, Quasi-peak, and average amplitudes were checked for compliance with the regulations. Worst-case emissions are reported with other emissions found in the restricted frequency bands at least 20 dB below the requirements.

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
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| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
| Phone/Fax: (913) 837-3214           | Test to: CFR47 15C, RSS-Gen, RSS-210 | Date: November 21, 2017 |
| Revision 1                          | File: A03304 TstRpt 170720           | Page 14 of 30           |



#### **General Radiated Emissions Procedure**

The EUT was arranged in a typical equipment configuration and operated through all available mode during testing. Preliminary testing was performed in a screen room with the EUT positioned 1 meter from the FSM. Radiated emissions measurements were performed to identify the frequencies, which produced the highest emissions. Each radiated emission was then maximized at the OATS location before final radiated measurements were performed. Final data was taken with the EUT located at the OATS at a distance of 3 meters between the EUT and the receiving antenna. The frequency spectrum from 9 kHz to 25,000 MHz was searched for general radiated emissions. Measured emission levels were maximized by EUT placement on the table, rotating the turntable through 360 degrees, varying the antenna height between 1 and 4 meters above the ground plane and changing antenna position between horizontal and vertical polarization. Antennas used were Loop from 9 kHz to 30 MHz, Broadband Biconical from 30 to 200 MHz, Biconilog from 30 to 1000 MHz, Log Periodic from 200 MHz to 1 GHz and or double Ridge or pyramidal horns and mixers above 1 GHz, notch filters and appropriate amplifiers and external mixers were utilized.

| Frequency<br>in MHz | Horizontal<br>Peak<br>(dBµV/m) | Horizontal<br>Quasi-Peak<br>(dBµV/m) | Horizontal<br>Average<br>(dBµV/m) | Vertical<br>Peak<br>(dBµV/m) | Vertical<br>Quasi-Peak<br>(dBµV/m) | Vertical<br>Average<br>(dBµV/m) | Limit @ 3m<br>(dBµV/m) |
|---------------------|--------------------------------|--------------------------------------|-----------------------------------|------------------------------|------------------------------------|---------------------------------|------------------------|
| 32.0                | 34.4                           | 26.9                                 | N/A                               | 37.5                         | 31.9                               | N/A                             | 40.0                   |
| 48.0                | 36.2                           | 27.8                                 | N/A                               | 35.5                         | 26.0                               | N/A                             | 40.0                   |
| 56.0                | 33.9                           | 26.8                                 | N/A                               | 32.2                         | 24.6                               | N/A                             | 40.0                   |
| 60.0                | 34.9                           | 23.9                                 | N/A                               | 35.4                         | 24.0                               | N/A                             | 40.0                   |
| 112.0               | 36.4                           | 25.6                                 | N/A                               | 32.3                         | 22.8                               | N/A                             | 40.0                   |
| 128.0               | 30.3                           | 18.5                                 | N/A                               | 26.3                         | 16.6                               | N/A                             | 40.0                   |

**Table 3 General Radiated Emissions Data** 

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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#### Summary of Results for General Radiated Emissions

The EUT demonstrated compliance with the radiated emissions requirements of CFR47 Part 15C paragraph 15.209, RSS-210 and RSS-GEN Intentional Radiators. The EUT demonstrated a minimum margin of -8.1 dB below the requirements. Other emissions were present with amplitudes at least 20 dB below the Limits.

#### Operation in the Band 2400 – 2483.5 MHz

The transmitter output power; harmonic and general emissions were measured on an open area test site @ 3 meters. The EUT was placed on a turntable elevated as required above the ground plane and at a distance of 3 meters from the FSM antenna. The peak and quasi-peak amplitude of frequencies below 1000 MHz were measured using a spectrum analyzer. The peak and average amplitude of frequencies above 1000 MHz were measured using a spectrum analyzer. The amplitude of each emission was then recorded from the analyzer display. Emissions radiated outside of the specified bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits, whichever is the lesser attenuation. Antenna port emission plots were taken of transmitter performance for reference in this and other documentation using test sample #2. The amplitude of each radiated emission was measured on the OATS at a distance of 3 meters from the FSM antenna testing was performed on sample representative of production with integral antenna (sample #1) with worse case data provided. The amplitude of each radiated emission was maximized by equipment orientation and placement on the turn table, raising and lowering the FSM (Field Strength Measuring) antenna, changing the FSM antenna polarization, and by rotating the turntable. A Loop antenna was used for measuring emissions from 0.009 to 30 MHz, Biconilog Antenna for 30 to 1000 MHz, Double-Ridge, and/or Pyramidal Horn Antennas from 1 GHz to 25 GHz. Emissions were measured in dBuV/m @ 3 meters.

Refer to figures one through four showing plots taken of the 2402-2480 MHz, ANT modulation. Refer to figures five through eight showing plots of the BT BLE modulation performance displaying compliance with the specifications. Refer to figures nine through twelve showing plots of the BT BLE-R modulation performance displaying compliance with the specifications.

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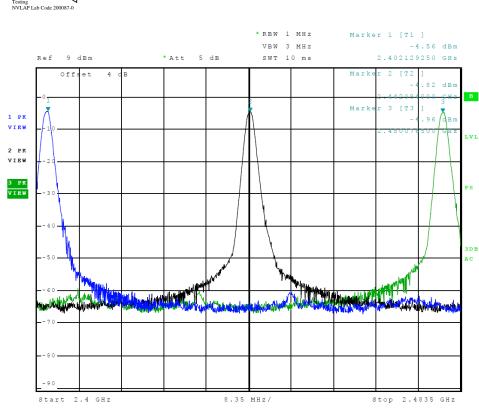


Figure 1 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, ANT GFSK)

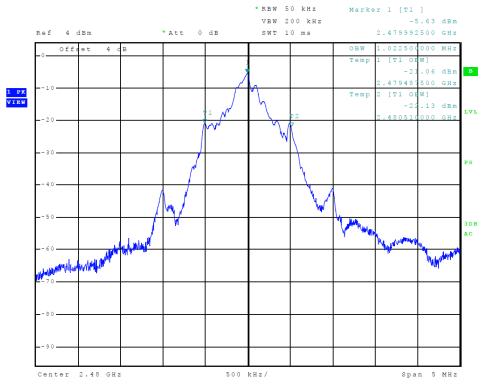


Figure 2 Plot of Transmitter Emissions (99% Occupied Bandwidth, ANT)

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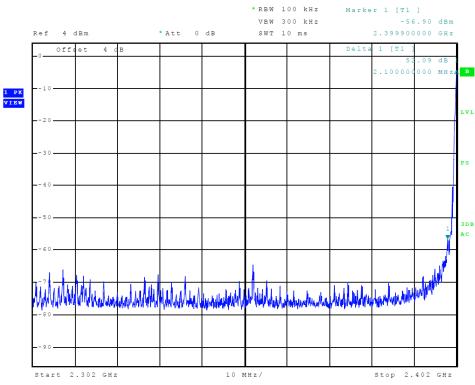


Figure 3 Plot of Transmitter Emissions (Low Band Edge, ANT)

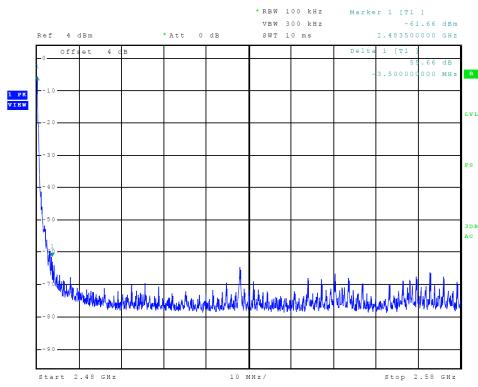


Figure 4 Plot of Transmitter Emissions (High Band Edge, ANT)

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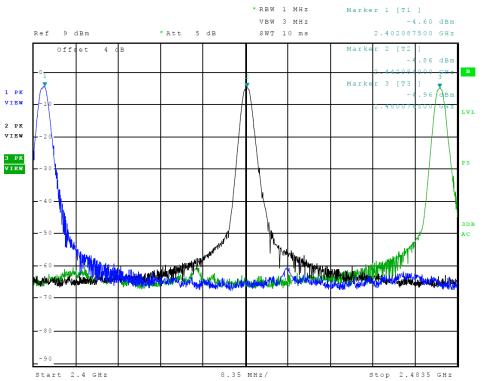
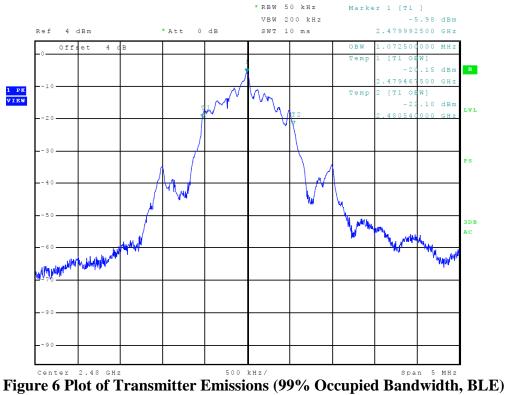


Figure 5 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, BLE)



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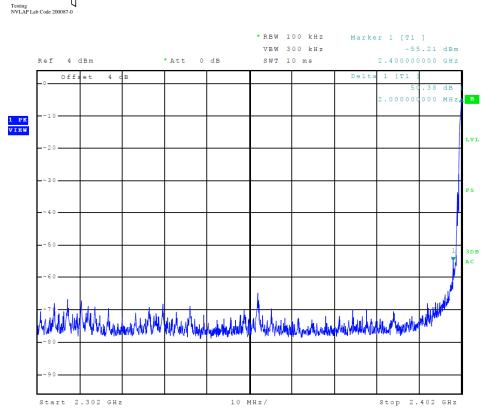


Figure 7 Plot of Transmitter Emissions (Low Band Edge, BLE)

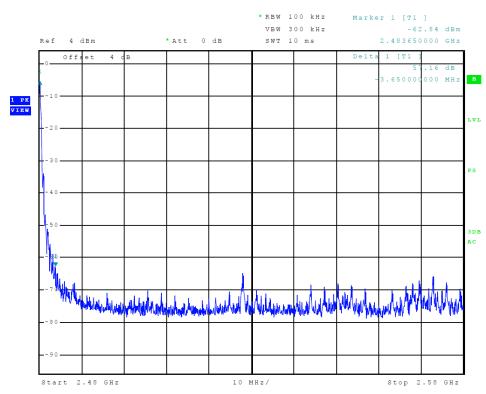


Figure 8 Plot of Transmitter Emissions (High Band Edge, BLE)

Rogers Labs, Inc.Gan4405 West 259th TerraceMoLouisburg, KS 66053TesPhone/Fax: (913) 837-3214TesRevision 1File

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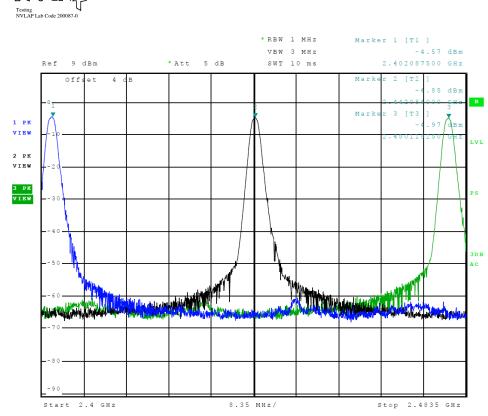


Figure 9 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, BLE -R)

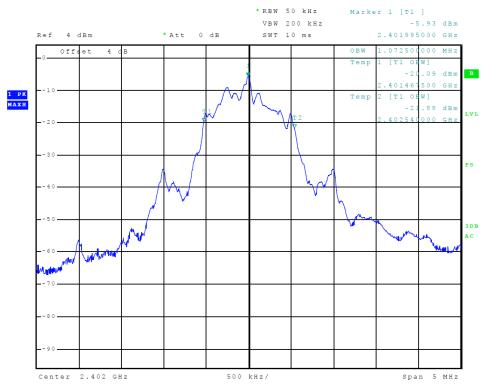


Figure 10 Plot of Transmitter Emissions (99% Occupied Bandwidth, BLE -R)

Rogers Labs, Inc.Ga4405 West 259th TerraceMoLouisburg, KS 66053TerPhone/Fax: (913) 837-3214TerRevision 1Fil

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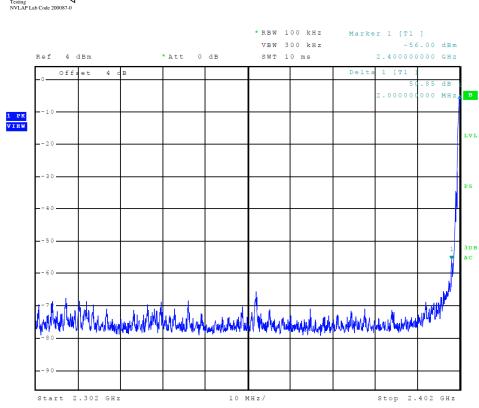


Figure 11 Plot of Transmitter Emissions (Low Band Edge, BLE -R)

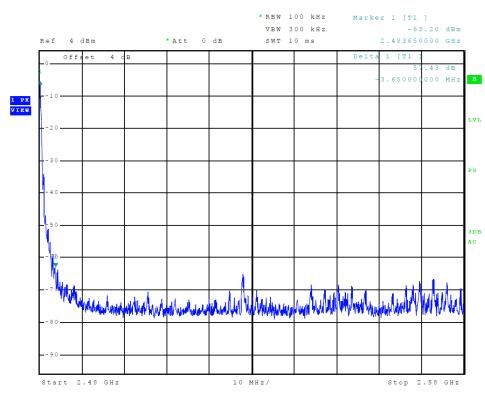


Figure 12 Plot of Transmitter Emissions (High Band Edge, BLE -R)

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#### Transmitter Emissions Data

#### Frequency in Horizontal Horizontal Horizontal Vertical Vertical Vertical Limit @ 3m MHz Peak **Ouasi-Peak** Average Peak **Ouasi-Peak** Average $(dB\mu V/m)$ 2402.0 83.6 N/A74.4 90.2 N/A 84.9 94.0 4804.0 47.6 N/A 38.0 52.5 N/A 43.2 54.0 7206.0 45.4 N/A 33.0 46.4 N/A 34.3 54.0 9608.0 46.5 N/A 34.1 47.2 N/A 34.1 54.0 12010.0 48.3 N/A 35.6 48.3 N/A 35.6 54.0 14412.0 50.7 N/A 38.1 50.6 N/A 38.0 54.0 16814.0 52.8 N/A 40.0 53.9 N/A 40.0 54.0 2442.0 81.5 N/A 78.2 89.3 N/A 84.7 94.0 4884.0 45.4 N/A 35.1 52.1 N/A 42.5 54.0 7326.0 45.7 N/A 32.6 48.6 N/A 38.2 54.0 9768.0 47.3 N/A 34.8 47.0 N/A 34.2 54.0 12210.0 49.7 N/A 36.9 50.0 N/A 36.6 54.0 14652.0 50.2 N/A 37.2 49.4 N/A 37.1 54.0 17094.0 54.6 N/A 41.2 54.8 N/A 41.5 54.0 2480.0 81.7 N/A 77.4 84.9 N/A 94.0 80.8 4960.0 46.3 N/A 34.8 38.2 N/A 54.0 31.3 54.0 7440.0 46.5 N/A 34.0 35.0 N/A 32.8 9920.0 47.2 34.8 34.4 N/A N/A 33.0 54.0 49.8 12400.0 N/A 36.6 36.6 N/A 37.0 54.0 14880.0 50.0 N/A 37.0 37.1 N/A 37.3 54.0 17360.0 53.4 N/A 40.6 40.9 N/A 40.1 54.0

#### Table 4 Transmitter Radiated Emissions (Worst-case) ANT

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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| Frequency in MHz | Horizontal<br>Peak<br>(dBµV/m) | Horizontal<br>Quasi-Peak<br>(dBµV/m) | Horizontal<br>Average<br>(dBµV/m) | Vertical<br>Peak<br>(dBµV/m) | Vertical<br>Quasi-Peak<br>(dBµV/m) | Vertical<br>Average<br>(dBµV/m) | Limit @ 3m<br>(dBµV/m) |
|------------------|--------------------------------|--------------------------------------|-----------------------------------|------------------------------|------------------------------------|---------------------------------|------------------------|
| 2402.0           | 82.3                           | N/A                                  | 76.9                              | 89.9                         | N/A                                | 84.3                            | 94.0                   |
| 4804.0           | 47.0                           | N/A                                  | 35.5                              | 52.3                         | N/A                                | 42.0                            | 54.0                   |
| 7206.0           | 44.3                           | N/A                                  | 31.8                              | 46.3                         | N/A                                | 34.5                            | 54.0                   |
| 9608.0           | 46.8                           | N/A                                  | 34.1                              | 47.8                         | N/A                                | 34.1                            | 54.0                   |
| 12010.0          | 48.7                           | N/A                                  | 35.6                              | 48.4                         | N/A                                | 35.5                            | 54.0                   |
| 14412.0          | 51.2                           | N/A                                  | 38.0                              | 50.7                         | N/A                                | 38.0                            | 54.0                   |
| 16814.0          | 53.1                           | N/A                                  | 40.1                              | 53.4                         | N/A                                | 40.1                            | 54.0                   |
| 2442.0           | 82.3                           | N/A                                  | 76.4                              | 89.9                         | N/A                                | 84.9                            | 94.0                   |
| 4884.0           | 47.1                           | N/A                                  | 36.4                              | 52.7                         | N/A                                | 41.4                            | 54.0                   |
| 7326.0           | 46.5                           | N/A                                  | 34.4                              | 45.0                         | N/A                                | 32.5                            | 54.0                   |
| 9768.0           | 47.2                           | N/A                                  | 34.7                              | 45.8                         | N/A                                | 32.0                            | 54.0                   |
| 12210.0          | 49.2                           | N/A                                  | 36.8                              | 49.1                         | N/A                                | 36.6                            | 54.0                   |
| 14652.0          | 50.1                           | N/A                                  | 37.5                              | 50.5                         | N/A                                | 37.0                            | 54.0                   |
| 17094.0          | 54.1                           | N/A                                  | 41.7                              | 54.2                         | N/A                                | 41.4                            | 54.0                   |
| 2480.0           | 82.1                           | N/A                                  | 77.1                              | 89.7                         | N/A                                | 85.0                            | 94.0                   |
| 4960.0           | 46.1                           | N/A                                  | 33.9                              | 49.8                         | N/A                                | 39.2                            | 54.0                   |
| 7440.0           | 46.2                           | N/A                                  | 33.6                              | 45.3                         | N/A                                | 32.4                            | 54.0                   |
| 9920.0           | 47.6                           | N/A                                  | 34.7                              | 47.6                         | N/A                                | 35.0                            | 54.0                   |
| 12400.0          | 49.0                           | N/A                                  | 36.6                              | 49.6                         | N/A                                | 36.5                            | 54.0                   |
| 14880.0          | 49.6                           | N/A                                  | 36.5                              | 50.1                         | N/A                                | 36.6                            | 54.0                   |
| 17360.0          | 54.3                           | N/A                                  | 41.7                              | 53.9                         | N/A                                | 41.4                            | 54.0                   |

 Table 5 Transmitter Radiated Emissions (Worst-case) BT

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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#### Summary of Results for Transmitter Radiated Emissions of Intentional Radiator

The EUT demonstrated compliance with the radiated emissions requirements of FCC 47 CFR Part 15.249, Industry Canada RSS-GEN issue 4, RSS-210 issue 9 Intentional Radiator regulations. The EUT ANT modulation worst-case test sample configuration demonstrated minimum average margin of -9.1 dB below the average emission limit for the fundamental. The EUT BT modulation worst-case test sample configuration demonstrated minimum average margin of -9.0 dB below the average emission limit for the fundamental. The EUT worst-case configuration demonstrated minimum radiated harmonic emission margin of -10.8 dB below the limit. No other radiated emissions were found in the restricted bands less than 20 dB below limits than those recorded in this report. Other emissions were present with amplitudes at least 20 dB below the limits.

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#### Annex

- Annex A Measurement Uncertainty Calculations
- Annex B Rogers Labs Test Equipment List
- Annex C Rogers Qualifications
- Annex D Rogers Labs Certificate of Accreditation

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#### Annex A Measurement Uncertainty Calculations

Measurement uncertainty calculations were made for the laboratory. Result of measurement uncertainty calculations are recorded below for AC line conducted and radiated emission measurements.

| Measurement Uncertainty                       | U <sub>(E)</sub> | U(lab) |
|---|------------------|--------|
| 3 Meter Horizontal 30-200 MHz Measurements    | 2.08             | 4.16   |
| 3 Meter Vertical 30-200 MHz Measurements      | 2.16             | 4.33   |
| 3 Meter Vertical Measurements 200-1000 MHz    | 2.99             | 5.97   |
| 10 Meter Horizontal Measurements 30-200 MHz   | 2.07             | 4.15   |
| 10 Meter Vertical Measurements 30-200 MHz     | 2.06             | 4.13   |
| 10 Meter Horizontal Measurements 200-1000 MHz | 2.32             | 4.64   |
| 10 Meter Vertical Measurements 200-1000 MHz   | 2.33             | 4.66   |
| 3 Meter Measurements 1-6 GHz                  | 2.57             | 5.14   |
| 3 Meter Measurements 6-18 GHz                 | 2.58             | 5.16   |
| AC Line Conducted                             | 1.72             | 3.43   |

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#### Annex B Rogers Labs Test Equipment List

| List of Test Equipment Calibration                                     | Date   | Due   |
|--|--------|-------|
| Spectrum Analyzer: Rohde & Schwarz ESU40                               | 5/17   | 5/18  |
| Spectrum Analyzer: HP 8562A, HP Adapters: 11518, 11519, and 11520      | 5/17   | 5/18  |
| Mixers: 11517A, 11970A, 11970K, 11970U, 11970V, 11970W                 | E /1 T | 5/10  |
| Spectrum Analyzer: HP 8591EM   | 5/17   | 5/18  |
| Antenna: EMCO Biconilog Model: 3143                                    | 5/17   | 5/18  |
| Antenna: Sunol Biconilog Model: JB6                                    |        | 10/17 |
| Antenna: EMCO Log Periodic Model: 3147                                 |        | 10/17 |
| Antenna: Com Power Model: AH-118                                       |        | 10/17 |
| Antenna: Com Power Model: AH-840                                       | 5/17   |       |
| Antenna: Antenna Research Biconical Model: BCD 235                     |        | 10/17 |
| Antenna: Com Power Model: AL-130                                       |        | 10/17 |
| Antenna: EMCO 6509   |        | 10/17 |
| LISN: Compliance Design Model: FCC-LISN-2.Mod.cd, 50 µHy/50 ohm/0.1 µf | 10/16  |       |
| R.F. Preamp CPPA-102   |        | 10/17 |
| Attenuator: HP Model: HP11509A   |        | 10/17 |
| Attenuator: Mini Circuits Model: CAT-3                                 |        | 10/17 |
| Attenuator: Mini Circuits Model: CAT-3                                 |        | 10/17 |
| Cable: Belden RG-58 (L1)   |        | 10/17 |
| Cable: Belden RG-58 (L2)   |        | 10/17 |
| Cable: Belden 8268 (L3)  |        | 10/17 |
| Cable: Time Microwave: 4M-750HF290-750                                 |        | 10/17 |
| Cable: Time Microwave: 10M-750HF290-750                                |        | 10/17 |
| Frequency Counter: Leader LDC825                                       | 2/17   | 2/18  |
| Oscilloscope Scope: Tektronix 2230                                     | 2/17   | 2/18  |
| Wattmeter: Bird 43 with Load Bird 8085                                 | 2/17   | 2/18  |
| Power Supplies: Sorensen SRL 20-25, SRL 40-25, DCR 150, DCR 140        | 2/17   | 2/18  |
| R.F. Generators: HP 606A, HP 8614A, HP 8640B                           | 2/17   | 2/18  |
| R.F. Power Amp 65W Model: 470-A-1010                                   | 2/17   | 2/18  |
| R.F. Power Amp 50W M185- 10-501  | 2/17   | 2/18  |
| R.F. Power Amp A.R. Model: 10W 1010M7                                  | 2/17   | 2/18  |
| R.F. Power Amp EIN Model: A301   | 2/17   | 2/18  |
| LISN: Compliance Eng. Model 240/20                                     | 2/17   | 2/18  |
| LISN: Fischer Custom Communications Model: FCC-LISN-50-16-2-08         | 2/17   | 2/18  |
| Antenna: EMCO Dipole Set 3121C   | 2/17   | 2/18  |
| Antenna: C.D. B-101  | 2/17   | 2/18  |
| Antenna: Solar 9229-1 & 9230-1   | 2/17   | 2/18  |
| Audio Oscillator: H.P. 201CD   | 2/17   | 2/18  |
| ESD Test Set 2010i   | 2/17   | 2/18  |
| Fast Transient Burst Generator Model: EFT/B-101                        | 2/17   | 2/18  |
| Field Intensity Meter: EFM-018   | 2/17   | 2/18  |
| KEYTEK Ecat Surge Generator  | 2/17   | 2/18  |
| Shielded Room 5 M x 3 M x 3.0 M  |        |       |

| Rogers Labs, Inc.                   | Garmin International, Inc.           | SN's: ENG1 / ENG2       |
|-------------------------------------|--------------------------------------|-------------------------|
| 4405 West 259 <sup>th</sup> Terrace | Model: A03304                        | FCC ID: IPH-03304       |
| Louisburg, KS 66053                 | Test #: 170720                       | IC: 1792A-03304         |
| Phone/Fax: (913) 837-3214           | Test to: CFR47 15C, RSS-Gen, RSS-210 | Date: November 21, 2017 |
| Revision 1                          | File: A03304 TstRpt 170720           | Page 28 of 30           |



#### Annex C Rogers Qualifications

#### Scot D. Rogers, Engineer

#### **Rogers Labs, Inc.**

Mr. Rogers has approximately 17 years' experience in the field of electronics. Engineering experience includes six years in the automated controls industry and remaining years working with the design, development and testing of radio communications and electronic equipment.

#### Positions Held

| Systems Engineer:    | A/C Controls Mfg. Co., Inc. 6 Years  |
|----------------------|--------------------------------------|
| Electrical Engineer: | Rogers Consulting Labs, Inc. 5 Years |
| Electrical Engineer: | Rogers Labs, Inc. Current            |

#### Educational Background

- 1) Bachelor of Science Degree in Electrical Engineering from Kansas State University.
- 2) Bachelor of Science Degree in Business Administration Kansas State University.
- Several Specialized Training courses and seminars pertaining to Microprocessors and Software programming.

Sot DRogers

Scot D. Rogers

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03304 Test #: 170720 Test to: CFR47 15C, RSS-Gen, RSS-210 File: A03304 TstRpt 170720 SN's: ENG1 / ENG2 FCC ID: IPH-03304 IC: 1792A-03304 Date: November 21, 2017 Page 29 of 30



#### Annex D Rogers Labs Certificate of Accreditation



Rogers Labs, Inc.Garmin International, Inc.SN's:4405 West 259th TerraceModel: A03304FCC ILouisburg, KS 66053Test #: 170720IC: 17Phone/Fax: (913) 837-3214Test to: CFR47 15C, RSS-Gen, RSS-210Date:Revision 1File: A03304 TstRpt 170720Page 3

SN's: ENG1 / ENG2 FCC ID: IPH-03304 IC: 1792A-03304 Date: November 21, 2017 Page 30 of 30