

# Application For Grant of Certification FOR

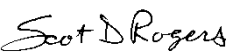
Model: A03337  
2412-2462 MHz (DTS)  
Broadband Digital Transmission System  
FCC ID: IPH-03337  
IC: 1792A-03337

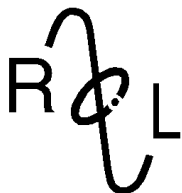
FOR

## Garmin International, Inc.

1200 East 151st Street  
Olathe, KS 66062

FCC Site Registration: 315994  
IC Test Site Registration: 3041A-1  
Test Report Number: 170724

Authorized Signatory:   
Scot D. Rogers



## **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  
CFR 47, PART 15C - Intentional Radiators  
CFR 47 Paragraph 15.247 and  
Industry Canada RSS-GEN and RSS-247  
License Exempt Intentional Radiator

For  
**Garmin International, Inc.**

1200 East 151st Street  
Olathe, KS 66062

Digital Transmission System  
Model: A03337

Frequency Range 2412-2462 MHz  
FCC ID: IPH-03337  
IC: 1792A-03337

Test Date: July 24, 2017

Certifying Engineer: *Scot D. Rogers*

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Rogers Labs, Inc.  
4405 West 259<sup>th</sup> Terrace  
Louisburg, KS 66053  
Phone/Fax: (913) 837-3214  
Revision 2

Garmin International, Inc.  
Model: A03337  
Test #: 170724  
Test to: CFR47 15C, RSS-Gen RSS-247  
File: A03337 DTS TstRpt 170724 r2

SN's: 5C2000123 / 5C1000155  
FCC ID: IPH-03337  
IC: 1792A-03337  
Date: September 20, 2017  
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## Revisions

Revision 2 Issued September 20, 2017 – corrected references to KDB 558074

Revision 1 Issued September 11, 2017

Rogers Labs, Inc.  
4405 West 259<sup>th</sup> Terrace  
Louisburg, KS 66053  
Phone/Fax: (913) 837-3214  
Revision 2

Garmin International, Inc.  
Model: A03337  
Test #: 170724  
Test to: CFR47 15C, RSS-Gen RSS-247  
File: A03337 DTS TstRpt 170724 r2

SN's: 5C2000123 / 5C1000155  
FCC ID: IPH-03337  
IC: 1792A-03337  
Date: September 20, 2017  
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## Foreword

The following information is submitted for consideration in obtaining Grant of Certification for License Exempt Digital Transmission System Intentional Radiator operating under Code of Federal Regulations Title 47 (CFR 47) Paragraph 15.247 and Industry Canada RSS-GEN, Issue 4 and RSS-247 Issue 2, operation in the 2400 – 2483.5 MHz band.

Name of Applicant: Garmin International, Inc.  
1200 East 151st Street  
Olathe, KS 66062

M/N: A03337 HVID: A03337

FCC ID: IPH-03337 Industry Canada ID: 1792A-03337

Frequency Range: 2412-2462 MHz (20 MHz channels), Average output power 0.006 W,  
Peak Power 0.016 Watts, (99% Occupied bandwidth 80.11b - 13200,  
802.11g – 17000, 802.11n - 17960 kHz)

## Opinion / Interpretation of Results

Tests Performed	Margin (dB)	Results
Emissions 15.205, RSS-GEN	-16.0	Complies
Emissions as per CFR 47 paragraphs 2 and 15.207	-8.1	Complies
Emissions as per CFR 47 paragraphs 2 and 15.209	-7.9	Complies
Harmonic Emissions per CFR 47 15.247	-13.1	Complies
Peak Power Spectral Density per CFR 47 15.247	-11.2	Complies

## Equipment Tested

<u>Equipment</u>	<u>Model / PN</u>	<u>Serial Number</u>
EUT #1	A03337	5C1000123
EUT #2	A03337	5C1000155
Vehicle power Adapter	320-00239-47	N/A
Laptop Computer	Latitude E6320	FCN03Q1
USB Printer	Dell 0N5819	5D1SL61
Vehicle power Adapter	320-00239-B0	N/A

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

## Equipment Function

The EUT is a GPS receiver, media player, and display unit offering navigation and other information for the user. The design incorporates a low power transmitter with operation capability in the 2402-2480 MHz frequency band. The design offers interface capabilities with compatible equipment for power, wirelessly to a smartphone, or through a USB communications port. The EUT has no internal battery and relies solely on external power.

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 (Bluetooth® or Wi-Fi) providing wireless interface capabilities with compatible equipment. 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 the external power options provided. The DC adapter interface options were powered from an external benchtop DC power supply and the USB interface was powered from the laptop computer USB port. 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. This report documents compliance testing and results for applicable modes of operation. Test results in this report relate only to the products described in this report.

### **Equipment Configuration**

- 1) Unit operating off Vehicle AUX power



- 2) Unit connected to Computer USB port through cable assembly (GPN: 320-00559-0x)



- 3) Unit operating off Vehicle AUX power





## Application for Certification

- (1) Manufacturer: Garmin International, Inc.  
1200 East 151st Street  
Olathe, KS 66062
- (2) Identification: M/N: A03337 HVIN: A03337  
FCC ID: IPH-03337 IC: 1792A-03337
- (3) Instruction Book:  
Refer to Exhibit for Instruction Manual.
- (4) Description of Circuit Functions:  
Refer to Exhibit of Operational Description.
- (5) Block Diagram with Frequencies:  
Refer to Exhibit of Operational Description.
- (6) Report of Measurements:  
Report of measurements follows in this Report.
- (7) Photographs: Construction, Component Placement, etc.:  
Refer to Exhibit for photographs of equipment.
- (8) List of Peripheral Equipment Necessary for operation. The equipment operates from direct current power provided from DC interface options as presented in this filing. The design provides USB interface port for use with compatible equipment as presented in this documentation. The EUT offers no other connection ports than those presented in this filing.
- (9) Transition Provisions of CFR47 15.37 are not requested.
- (10) Not Applicable. The unit is not a scanning receiver.
- (11) Not Applicable. The EUT does not operate in the 59 – 64 GHz frequency band.
- (12) The equipment is not software defined and this section is not applicable.
- (13) Applications for certification of U-NII devices in the 5.15-5.35 GHz and the 5.47-5.85 GHz bands must include a high-level operational description of the security procedures that control the radio frequency operating parameters and ensure that unauthorized modifications cannot be made. This requirement is not applicable to his DTS device.
- (14) Contain at least one drawing or photograph showing the test set-up for each of the required types of tests applicable to the device for which certification is requested. These drawings or photographs must show enough detail to confirm other information 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 provided in this report and Test Setup Exhibits provided with the application filing.

## Applicable Standards & Test Procedures

The following information is submitted in accordance with the Federal Communications Code of Federal Regulations, dated October 31, 2016, 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 15.247, and Industry Canada RSS-GEN Issue 4, and RSS-247 Issue 2. Test procedures used are the established Methods of Measurement of Radio-Noise Emissions as described in ANSI C63.10-2013.

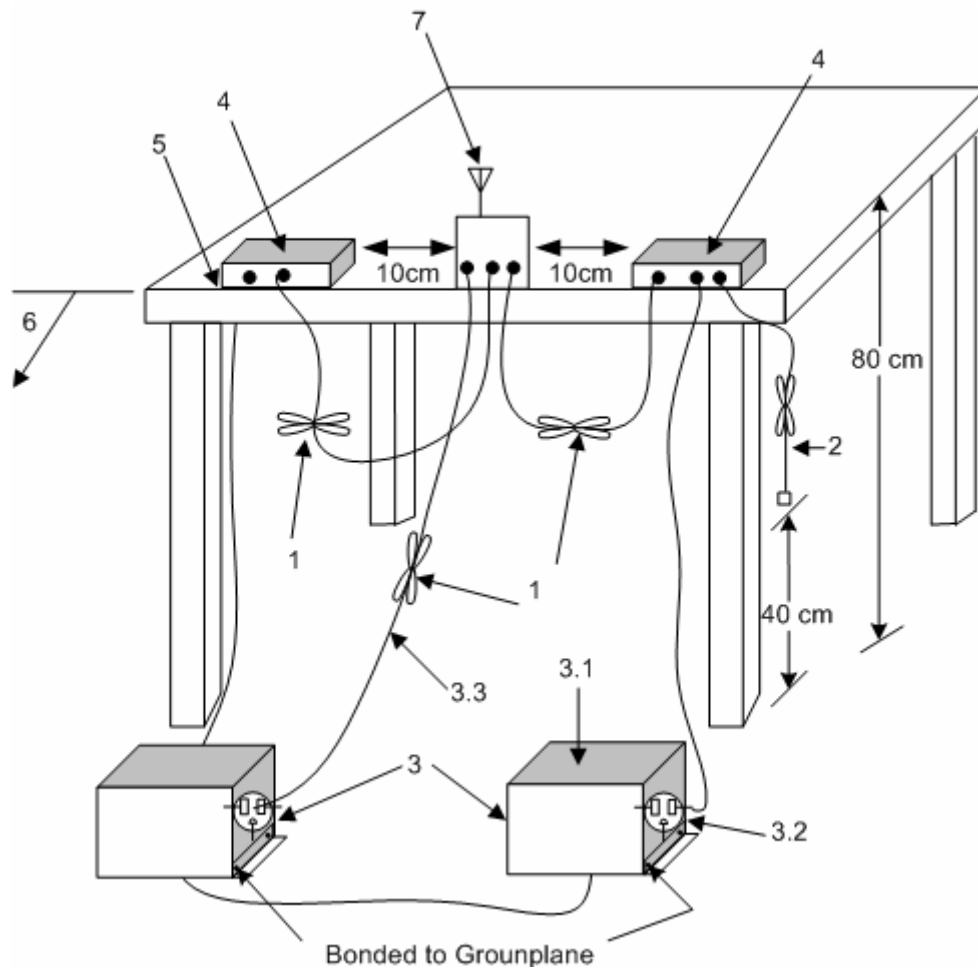
## Equipment Testing Procedures

### ***AC Line Conducted Emission Test Procedure***

Testing for the AC line-conducted emissions was performed as required in CFR47 15C, RSS-210 and specified in ANSI C63.10-2013. The test setup, including the EUT, was arranged in the test configurations as presented during testing. The test configuration was placed on a 1 x 1.5-meter bench, 0.8 meters high located in a screen room. The power lines of the system were isolated from the power source using a standard LISN with a 50-μHy choke. EMI was coupled to the spectrum analyzer through a 0.1 μF capacitor internal to the LISN. The LISN was positioned on the floor beneath the wooden bench supporting the EUT. The power lines and cables were draped over the back edge of the table. Refer to diagram one showing typical test arrangement and photographs in exhibits for EUT placement used during testing.

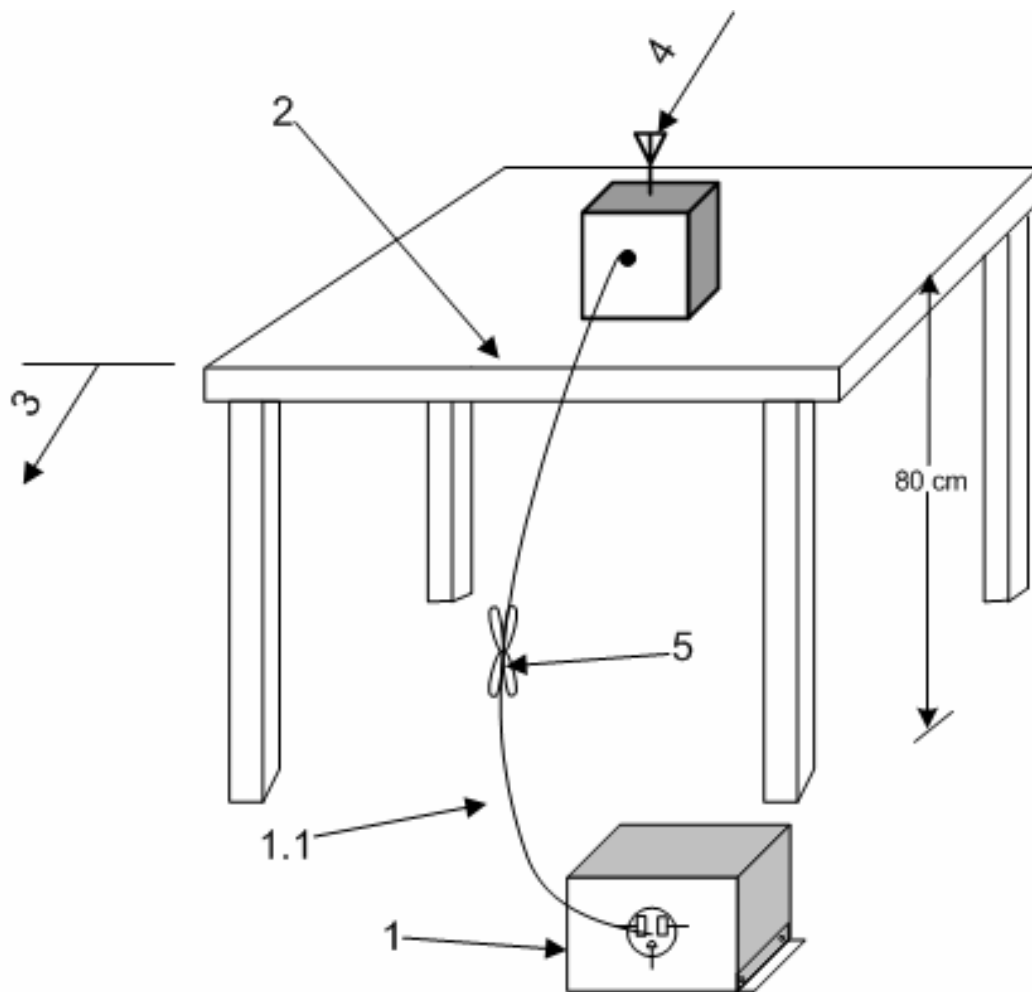
### ***Radiated Emission Test Procedure***

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 CFR47 15, RSS-247 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 using a spectrum analyzer. The frequency spectrum from 9 kHz to 25,000 MHz was searched for during preliminary investigation. Refer to diagrams two and three showing typical test arrangement and photographs in the test setup exhibits for specific EUT placement during testing.



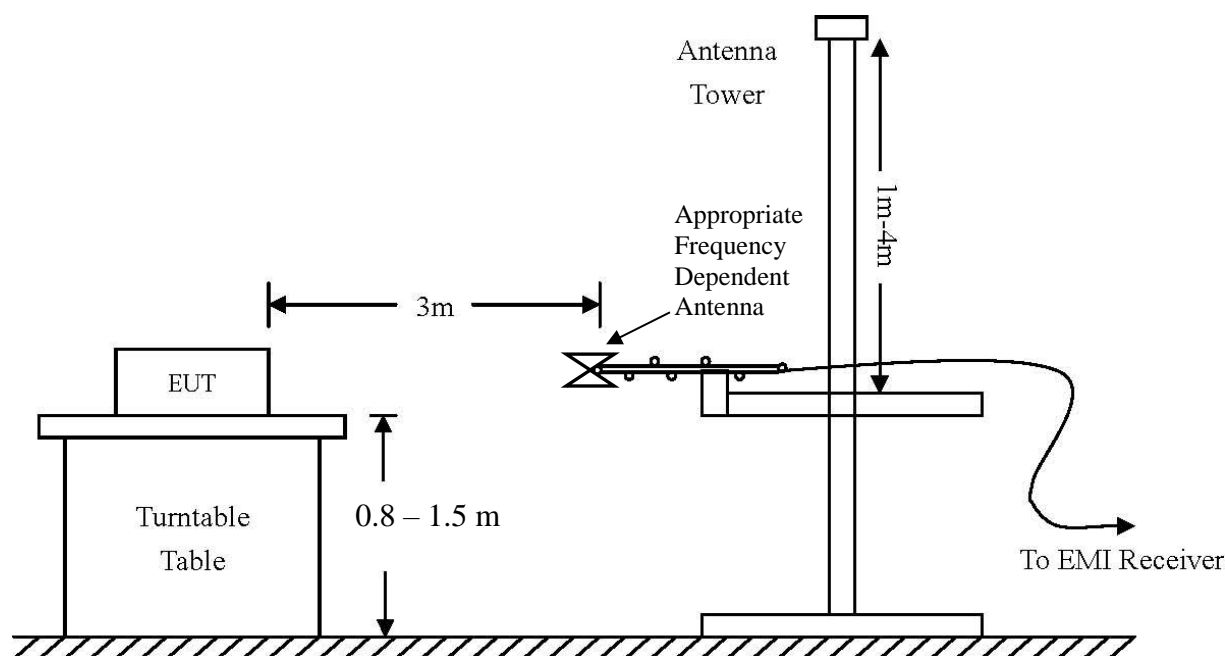
1. Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long see (see 6.2.3.1).
2. I/O cables that are not connected to an accessory shall be bundled in the center. The end of the cable may be terminated, if required, using the correct terminating impedance. The overall length shall not exceed 1 m (see 6.2.2).
3. EUT connected to one LISN. Unused LISN measuring port connectors shall be terminated in 50  $\Omega$  loads. LISN can be placed on top of, or immediately beneath, reference ground plane (see 6.2.2 and 6.2.3).
  - 3.1 All other equipment powered from additional LISN(s).
  - 3.2 Multiple-outlet strip can be used for multiple power cords of non-EUT equipment.
  - 3.3 LISN at least 80 cm from nearest part of EUT chassis.
4. Non-EUT components of EUT system being tested.
5. Rear of EUT, including peripherals, shall all be aligned and flush with rear of tabletop (see 6.2.3.1).
6. Edge of tabletop shall be 40 cm removed from a vertical conducting plane that is bonded to the ground plane (see 6.2.2 for options).
7. Antenna may be integral or detachable. If detachable, the antenna shall be attached for this test.

### Diagram 1 Test arrangement for Conducted emissions



1. A LISN is optional for radiated measurements between 30 MHz to 1000 MHz, but not allowed for measurements below 30 MHz and above 1000 MHz. (See 6.4.3, 6.5.1, and 6.6.3.) If used, connect EUT to one LISN. Unused LISN measuring port connectors shall be terminated in 50Ω. LISN can be placed on top of, or immediately beneath, reference ground plane (see 6.2.2 and 6.2.3.1).
  - 1.1 LISN spaced at least 80 cm from nearest part of EUT chassis.
2. The EUT shall be placed in the center of the table to the extent possible. (See 6.2.3.1 and 6.3.4).
3. A vertical conducting plane, if used for conducted tests per 6.2.2, shall be removed for radiated emission tests.
4. Antenna may be integral or detachable, depending on the EUT.
5. 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.

**Diagram 2 Test arrangement for radiated emissions of tabletop equipment**



**Diagram 3 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 259<sup>th</sup> 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 259<sup>th</sup> Terrace, Louisburg, KS

**Site Registration**      Refer to Annex for Site Registration Letters

**NVLAP Accreditation**      Lab code 200087-0

## 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.

AC Line Conducted Emissions (0.150 -30 MHz)		
RBW	AVG. BW	Detector Function
9 kHz	30 kHz	Peak / Quasi Peak
Emissions (30-1000 MHz)		
RBW	AVG. BW	Detector Function
120 kHz	300 kHz	Peak / Quasi Peak
Emissions (Above 1000 MHz)		
RBW	Video BW	Detector Function
100 kHz	100 kHz	Peak
1 MHz	1 MHz	Peak / Average

<u>Equipment</u>	<u>Manufacturer</u>	<u>Model (SN)</u>	<u>Band</u>	<u>Cal Date</u>	<u>Due</u>
<input checked="" type="checkbox"/> LISN	FCC	FCC-LISN-50-2-10(1PA) (160611)	.15-30MHz	5/17	5/18
<input checked="" type="checkbox"/> Cable	Time Microwave	750HF290-750 (L10M)	9kHz-40 GHz	10/16	10/17
<input checked="" type="checkbox"/> Cable	Belden	RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/16	10/17
<input checked="" type="checkbox"/> Cable	Belden	RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/16	10/17
<input type="checkbox"/> Antenna	ARA	BCD-235-B (169)	20-350MHz	10/16	10/17
<input type="checkbox"/> Antenna	EMCO	3147 (40582)	200-1000MHz	10/16	10/17
<input checked="" type="checkbox"/> Antenna	ETS-Lindgren	3117 (200389)	1-18 GHz	5/17	5/18
<input type="checkbox"/> Antenna	Com Power	AH-118 (10110)	1-18 GHz	10/15	10/17
<input checked="" type="checkbox"/> Antenna	Com Power	AH-840 (101046)	18-40 GHz	5/17	5/18
<input checked="" type="checkbox"/> Antenna	Com Power	AL-130 (121055)	.001-30 MHz	10/16	10/17
<input checked="" type="checkbox"/> Antenna	Sunol	JB-6 (A100709)	30-1000 MHz	10/16	10/17
<input type="checkbox"/> Antenna	EMCO	3143 (9607-1277)	20-1200 MHz	5/17	5/18
<input type="checkbox"/> Analyzer	HP	8591EM (3628A00871)	9kHz-1.8GHz	5/17	5/18
<input type="checkbox"/> Analyzer	HP	8562A (3051A05950)	9kHz-110GHz	5/17	5/18
<input type="checkbox"/> Analyzer	HP External Mixers	11571, 11970	25GHz-110GHz	5/17	5/18
<input checked="" type="checkbox"/> Analyzer	Rohde & Schwarz	ESU40 (100108)	20Hz-40GHz	5/17	5/18
<input checked="" type="checkbox"/> Amplifier	Com-Power	PA-010 (171003)	100Hz-30MHz	10/16	10/17
<input checked="" type="checkbox"/> Amplifier	Com-Power	CPPA-102 (01254)	1-1000 MHz	10/16	10/17
<input checked="" type="checkbox"/> Amplifier	Com-Power	PAM-118A (551014)	0.5-18 GHz	10/16	10/17
<input type="checkbox"/> Power Mtr	Agilent	N1911A with N1921A	0.05-18 GHz	5/16	5/17

## Units of Measurements

Conducted EMI              Data is in dBμV; dB referenced to one microvolt

Radiated EMI              Data is in dBμV/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              22.9° C

Relative Humidity                  47%

Atmospheric Pressure              1013.7 mb

## Statement of Modifications and Deviations

No modifications to the EUT were required for the unit to demonstrate compliance with the CFR47 Part 15C, RSS-Gen, and RSS-247 emission requirements. There were no deviations to the specifications.

## Intentional Radiators

As per CFR47, Subpart C, paragraph 15.247 and Industry Canada RSS-247 and RSS-Gen the following information is submitted.

## Antenna Requirements

The EUT incorporates integral antenna system and 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.

## 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 paragraph 6 and KDB 558074 paragraph 11.0 were used during testing. No other significant emission was observed which fell into the restricted bands of operation. Computed emission values consider the received radiated field strength, receive antenna correction factor, amplifier gain stage, and test system cable losses.

**Table 1 Harmonic Radiated Emissions in Restricted Bands Data (Worst-case)**

Frequency in MHz	Horizontal Peak (dBμV/m)	Horizontal Quasi-Peak (dBμV/m)	Horizontal Average (dBμV/m)	Vertical Peak (dBμV/m)	Vertical Quasi-Peak (dBμV/m)	Vertical Average (dBμV/m)	Limit @ 3m (dBμV/m)
2390.0	43.9	N/A	30.3	45.4	N/A	28.9	54.0
2483.5	46.4	N/A	30.3	42.5	N/A	29.5	54.0
4824.0	47.4	N/A	33.7	48.2	N/A	34.7	54.0
4874.0	47.3	N/A	34.0	48.8	N/A	35.4	54.0
4924.0	48.3	N/A	34.5	46.3	N/A	32.6	54.0
7236.0	46.2	N/A	33.6	45.6	N/A	32.9	54.0
7311.0	44.2	N/A	31.4	45.7	N/A	32.3	54.0
7386.0	46.5	N/A	32.7	45.4	N/A	32.8	54.0
12060.0	50.6	N/A	36.5	49.7	N/A	36.7	54.0
12185.0	48.8	N/A	35.7	48.5	N/A	35.8	54.0
12310.0	48.8	N/A	35.6	48.8	N/A	35.6	54.0

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



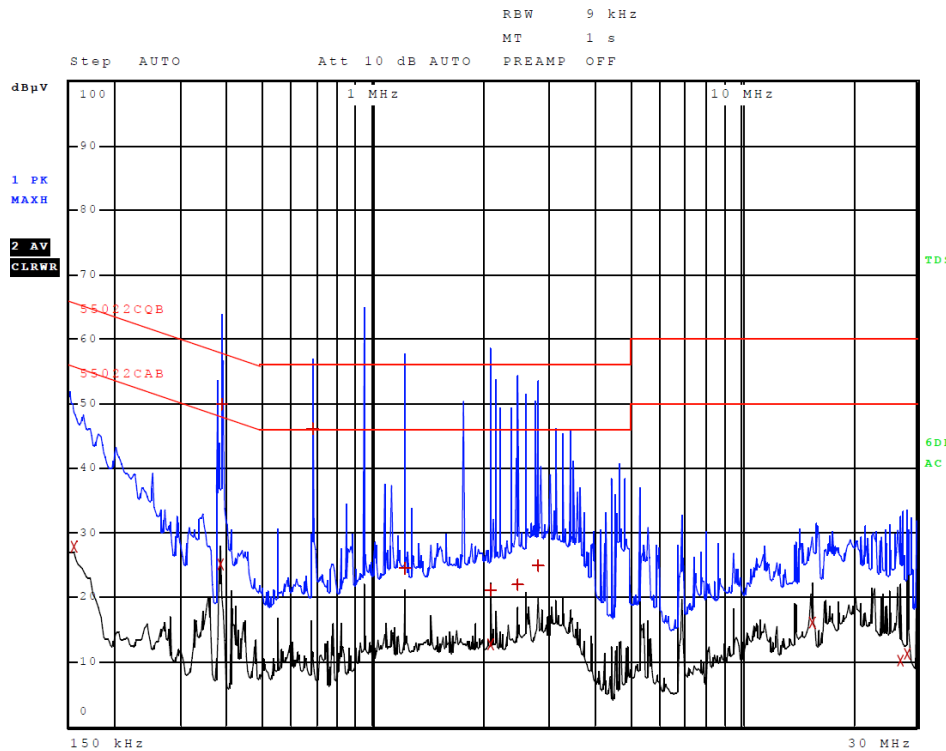
## **Summary of Results for Radiated Emissions in Restricted Bands**

The EUT demonstrated compliance with the radiated emissions requirements of CFR 47 Part 15C RSS-Gen, and RSS-247 Intentional Radiators. The EUT demonstrated a worst-case minimum harmonic margin of -16.0 dB below the radiated 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.

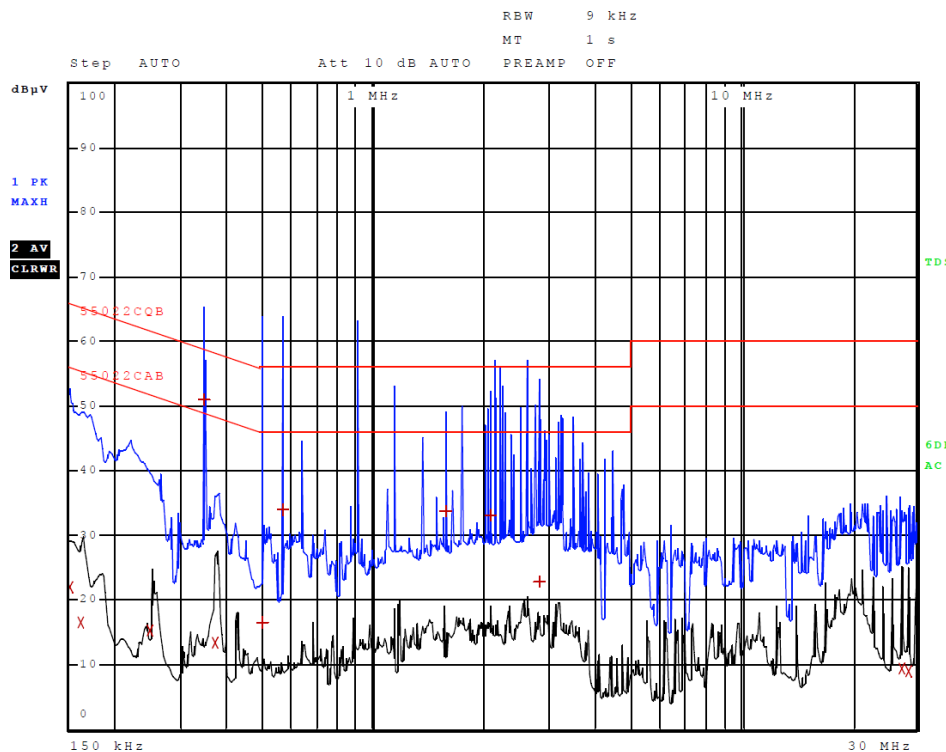
## **AC Line Conducted EMI Procedure**

The EUT was arranged in typical equipment configurations as offered by manufacturer. Testing was performed with the EUT placed on a 1 x 1.5-meter bench 80 cm above the conducting ground plane, floor of a screen room. The bench was positioned 40 cm away from the wall of the screen room. The LISN was positioned on the floor of the screen room 80-cm from the rear of the EUT. Testing for the line-conducted emissions followed the procedures of ANSI C63.4-2014. The EUT was connected to the AC Line conducted in configurations as directed by the manufacture and presented in configurations defined above for AC line conducted emissions testing. The AC adapter for the CPU supporting the EUT was connected to the LISN for line-conducted emissions testing. A second LISN was positioned on the floor of the screen room 80-cm from the rear of the supporting equipment of the test configuration. All power cords except the EUT were then powered from the second LISN. EMI was coupled to the spectrum analyzer through a 0.1  $\mu$ F capacitor, internal to the LISN. Power line conducted emissions testing was carried out individually for each current carrying conductor of the EUT. The excess length of lead between the system and the LISN receptacle was folded back and forth to form a bundle not exceeding 40 cm in length. The screen room, conducting ground plane, analyzer, and LISN were bonded together to the protective earth ground. Preliminary testing was performed to identify the frequencies of each of the emissions, which demonstrated the highest amplitudes. The cables were repositioned to obtain maximum amplitude of measured EMI level. Once the worst-case configuration was identified, plots were made of the EMI from 0.15 MHz to 30 MHz then data was recorded with

Refer to figures one and two showing plots of the AC Line conducted emissions of the computer AC adapter while interfaced with the EUT.



**Figure 1 AC Line Conducted emissions of EUT line 1 (EUT-USB-CPU)**



**Figure 2 AC Line Conducted emissions of EUT line 2 (EUT-USB-CPU)**

**Table 2 AC Line Conducted Emissions Data L1 (EUT-USB-CPU)**

Trace	Frequency	Level (dBµV)	Detector	Delta Limit/dB
2	154.000000000 kHz	27.81	Average	-27.97
2	382.000000000 kHz	25.10	Average	-23.14
1	386.000000000 kHz	49.96	Quasi Peak	-8.19
1	682.000000000 kHz	46.15	Quasi Peak	-9.85
1	1.214000000 MHz	24.41	Quasi Peak	-31.59
2	2.078000000 MHz	12.75	Average	-33.25
1	2.078000000 MHz	21.15	Quasi Peak	-34.85
1	2.474000000 MHz	21.85	Quasi Peak	-34.15
1	2.794000000 MHz	24.86	Quasi Peak	-31.14
2	15.556000000 MHz	16.09	Average	-33.91
2	27.036000000 MHz	10.24	Average	-39.76
2	28.252000000 MHz	11.24	Average	-38.76

Other emissions present had amplitudes at least 20 dB below the limit.

**Table 3 AC Line Conducted Emissions Data L2 EUT-USB-CPU)**

Trace	Frequency	Level (dBµV)	Detector	Delta Limit/dB
2	150.000000000 kHz	21.98	Average	-34.02
2	162.000000000 kHz	16.55	Average	-38.82
2	250.000000000 kHz	15.18	Average	-36.58
1	346.000000000 kHz	50.90	Quasi Peak	-8.16
2	374.000000000 kHz	13.32	Average	-35.09
1	498.000000000 kHz	16.42	Quasi Peak	-39.61
1	566.000000000 kHz	33.87	Quasi Peak	-22.13
1	1.566000000 MHz	33.69	Quasi Peak	-22.31
1	2.078000000 MHz	33.12	Quasi Peak	-22.88
1	2.830000000 MHz	22.76	Quasi Peak	-33.24
2	27.224000000 MHz	9.34	Average	-40.66
2	28.508000000 MHz	8.93	Average	-41.07

Other emissions present had amplitudes at least 20 dB below the limit.

### **Summary of Results for AC Line Conducted Emissions Results**

The EUT demonstrated compliance with the AC Line Conducted Emissions requirements of 47CFR Part 15C and other applicable emissions requirements. The EUT USB CPU configuration #2 demonstrated a minimum margin of -8.1 dB below the FCC/IC requirements. Other emissions were present with amplitudes at least 20 dB below the limit and worst-case amplitudes recorded.

## General Radiated Emissions Procedure

The EUT was arranged in a typical equipment configuration and operated through all available modes with worst-case data recorded. 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 emissions measurements were performed. Final data was taken with the EUT positioned in three orthogonal axes on 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 from 1 GHz to 40 GHz, notch filters and appropriate amplifiers and external mixers were utilized.

**Table 4 General Radiated Emissions Data**

Frequency in MHz	Horizontal Peak (dBμV/m)	Horizontal Quasi-Peak (dBμV/m)	Horizontal Average (dBμV/m)	Vertical Peak (dBμV/m)	Vertical Quasi-Peak (dBμV/m)	Vertical Average (dBμV/m)	Limit @ 3m (dBμV/m)
108.3	36.7	25.6	N/A	32.6	22.1	N/A	40.0
109.9	34.5	22.3	N/A	33.1	20.2	N/A	40.0
117.3	34.6	22.5	N/A	28.7	18.3	N/A	40.0
120.0	35.7	24.5	N/A	30.5	20.7	N/A	40.0
220.7	35.3	32.1	N/A	27.0	23.6	N/A	40.0
257.5	32.3	29.0	N/A	20.5	14.4	N/A	47.0

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.

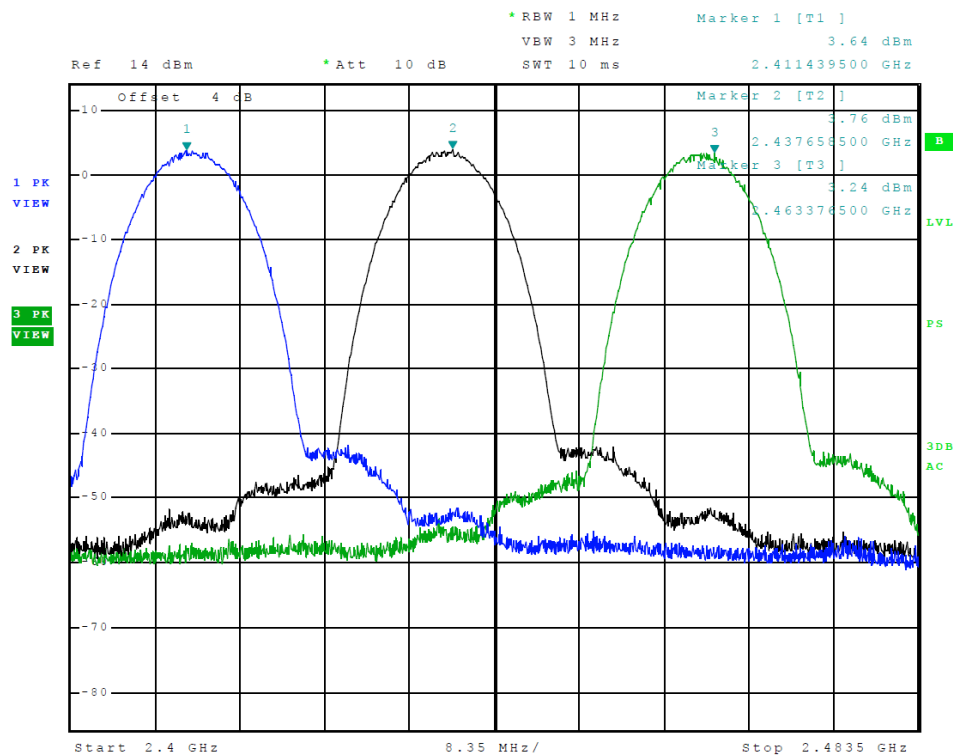
## **Summary of Results for General Radiated Emissions**

The EUT demonstrated compliance with the radiated emissions requirements of CFR47 Part 15C paragraph 15.209 and RSS-247 and RSS-GEN Intentional Radiators. The EUT demonstrated a minimum margin of -7.9 dB below the requirements. Other emissions were present with amplitudes at least 20 dB below the Limits.

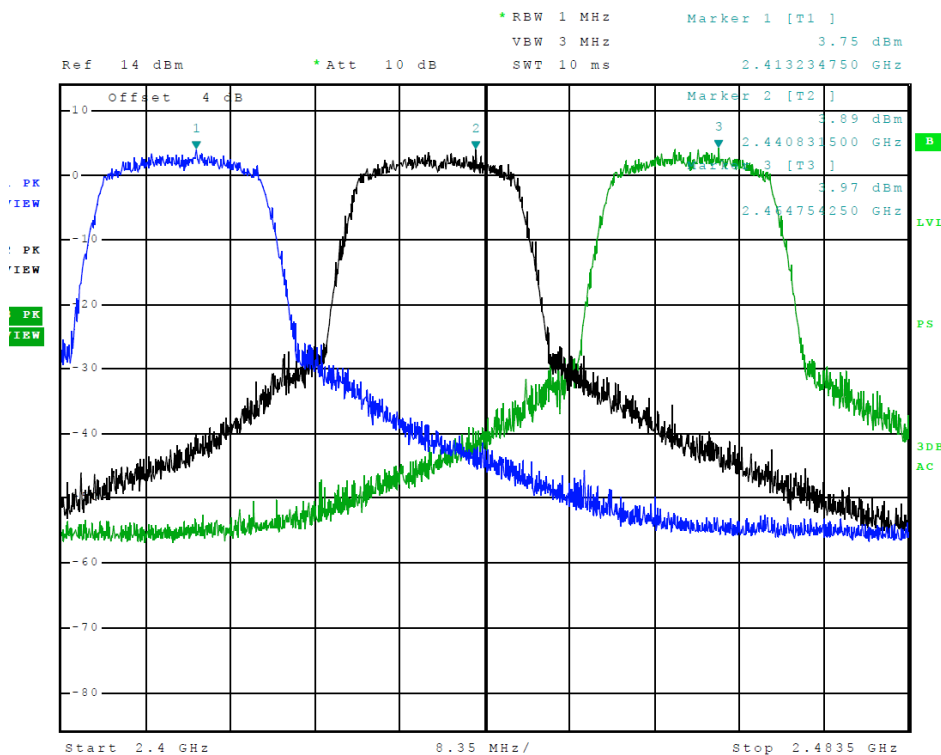
## **Operation in the Band 2400 – 2483.5 MHz**

Test procedures of ANSI C63.10-2013 paragraph 6, and KDB 558074 v04 were used during transmitter testing. The transmitter peak power was measured at the antenna port using a wide band peak RF power meter as described in KDB 558074 (9.1.3). The Peak Power Spectral Density (PKPSD) was measured as defined in KDB 558074 (10.2). Emission bandwidth was measured as described in KDB 558074 paragraph 8, and C63.10-2013. The amplitude of each general and harmonic radiated emission was measured on the OATS at a distance of 3 meters from the FSM antenna (testing was performed on sample 1 representative of production equipment with integral antenna). The EUT was positioned on supporting turntable elevated as required above the ground plane, at a distance of 3 meters from the FSM antenna. Radiated emission investigations were performed from 9 kHz to 25,000 MHz. Each radiated emission was maximized by varying the FSM antenna height and polarization, and by rotating the turntable. The worst-case amplitude of each emission was then recorded from the analyzer display. 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. 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. Radiated Emissions were measured in dBμV/m @ 3 meters. Test sample #2 was provided for testing antenna port conducted emissions. This sample was modified by replacing the internal antenna with a 50-ohm antenna port connector for testing purposes. Plots were taken of transmitter performance (using sample #2) for reference in this and other documentation.

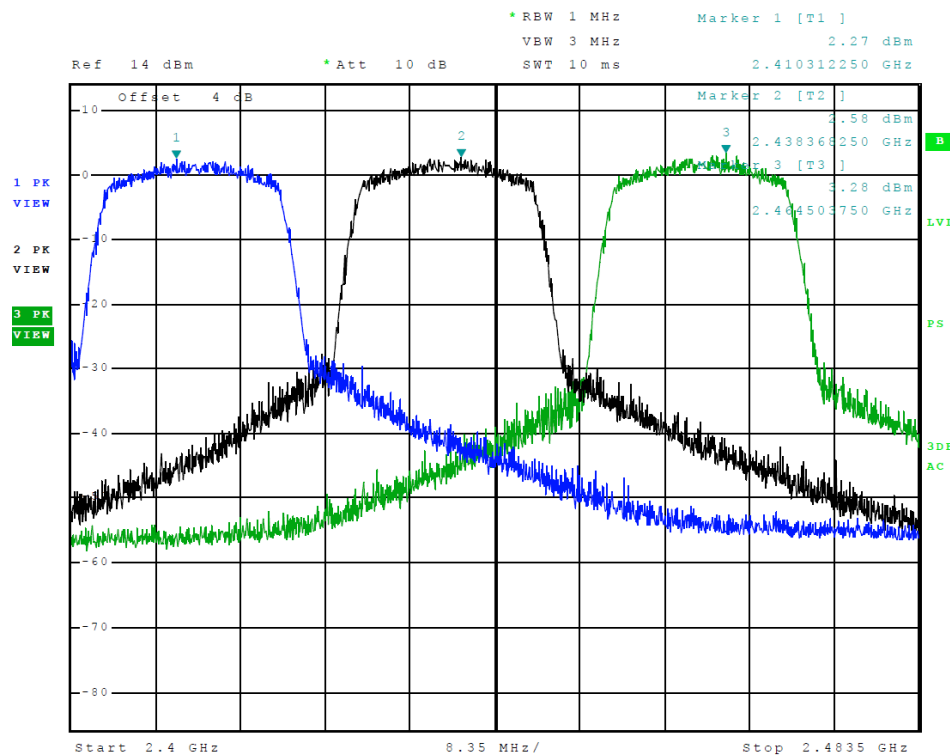
Refer to figures three through seventeen showing plots taken of the transmitter performance displaying compliance with the specifications.



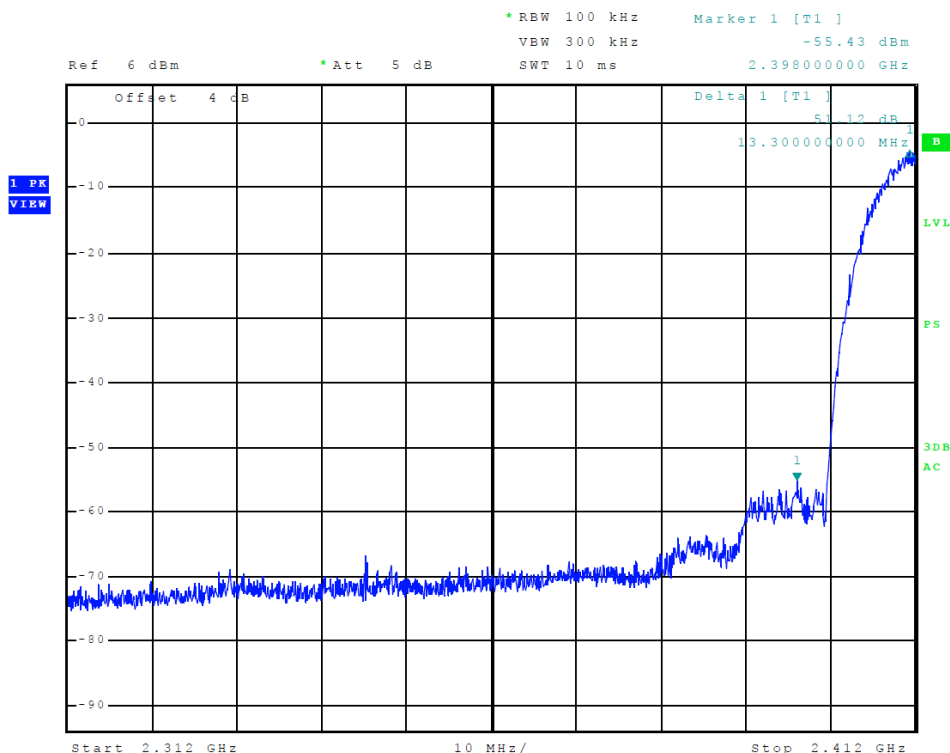
**Figure 3 Plot of Transmitter Emissions in Operational Frequency (802.11 b-Mode)**



**Figure 4 Plot of Transmitter Emissions in Operational Frequency (802.11 g-Mode)**



**Figure 5 Plot of Transmitter Emissions in Operational Frequency (802.11 n-Mode)**



**Figure 6 Plot of Lower Band Edge (802.11 b-mode)**

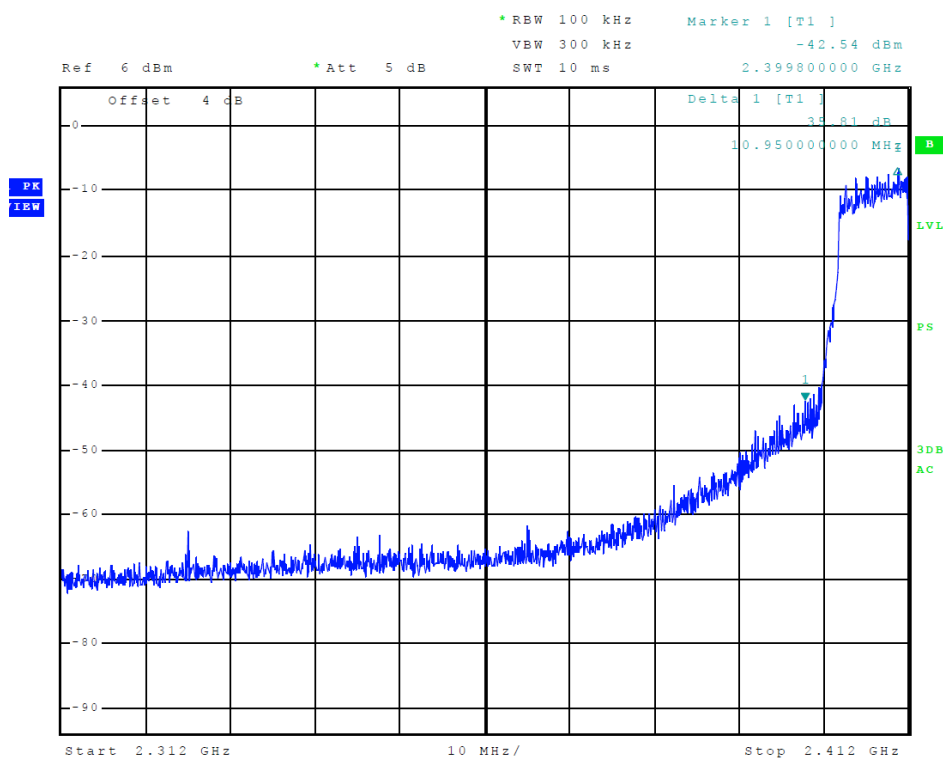


Figure 7 Plot of Lower Band Edge (802.11 g-mode)

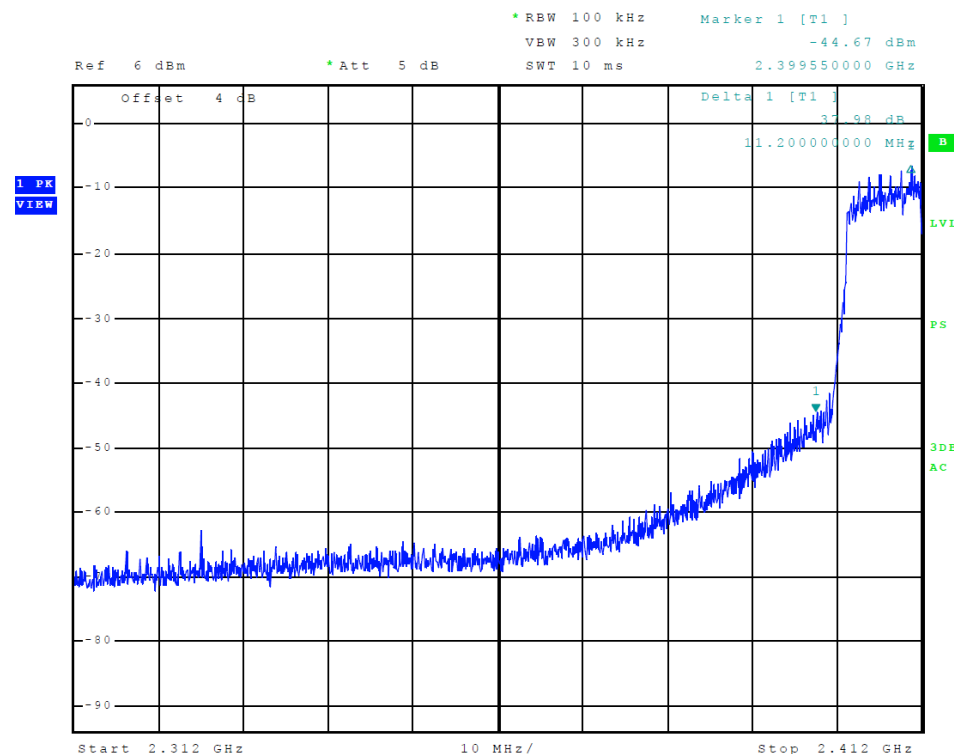


Figure 8 Plot of Lower Band Edge (802.11 n-mode)



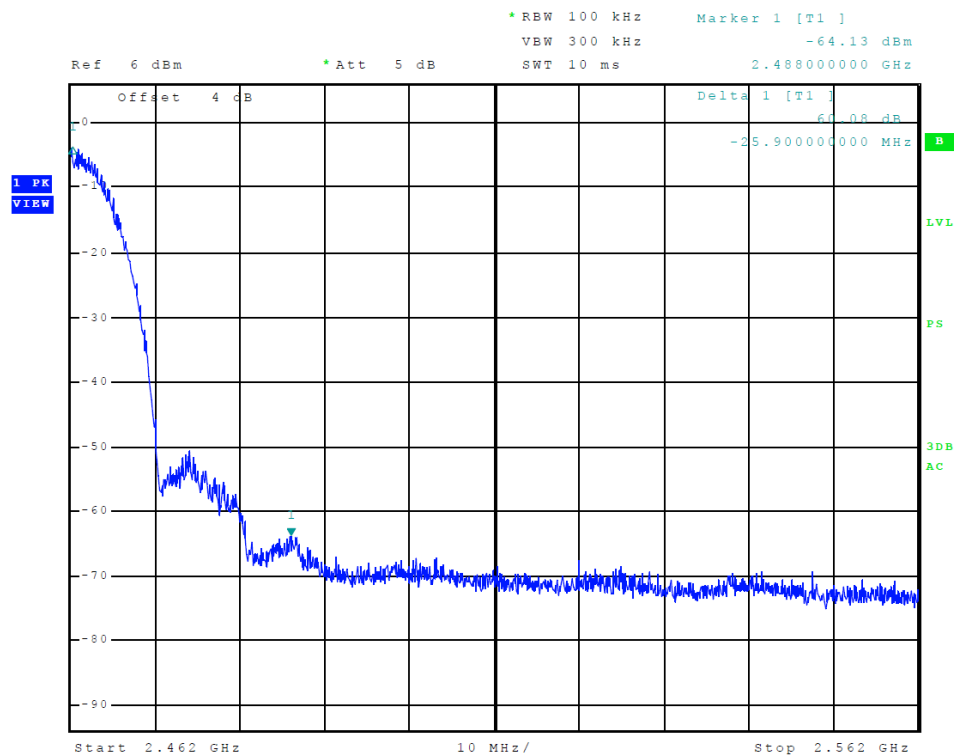


Figure 9 Plot of Upper Band Edge (802.11 b-mode)

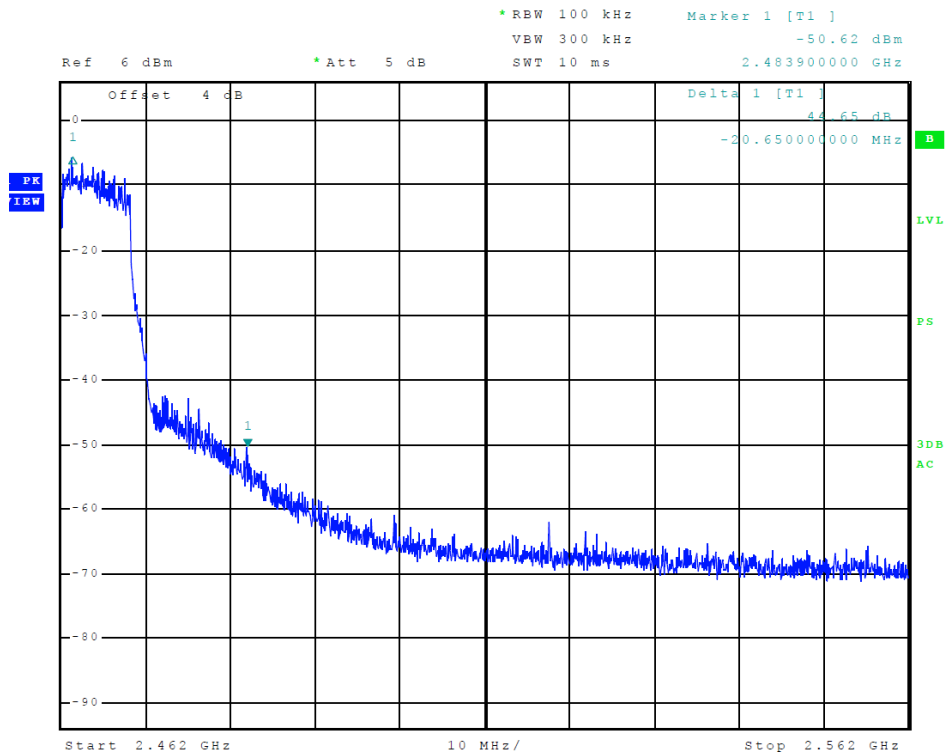
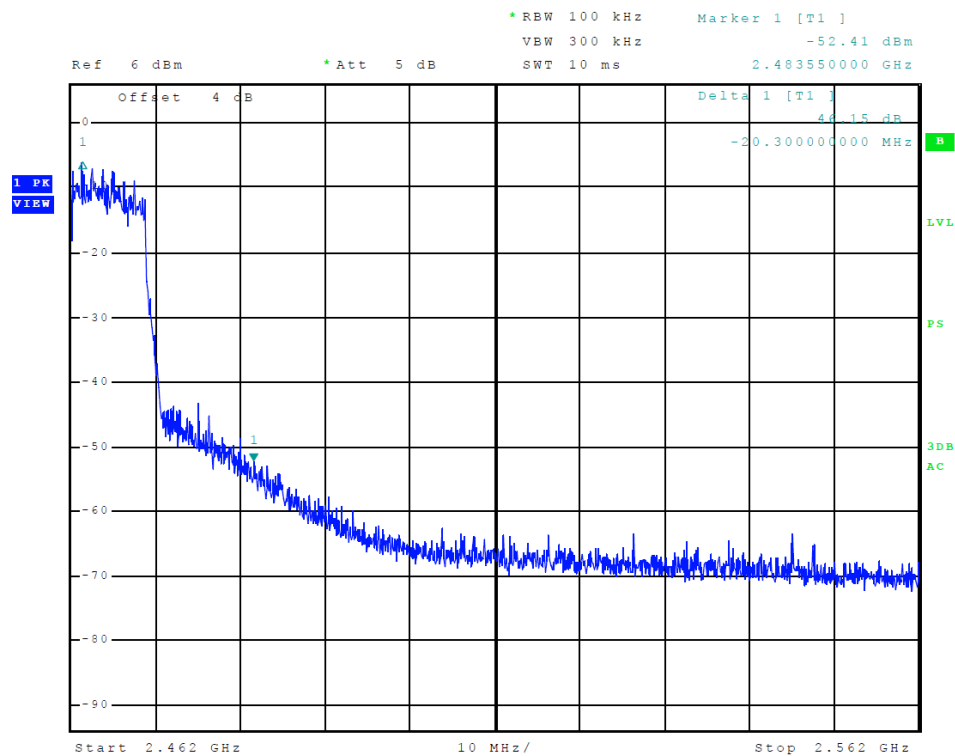
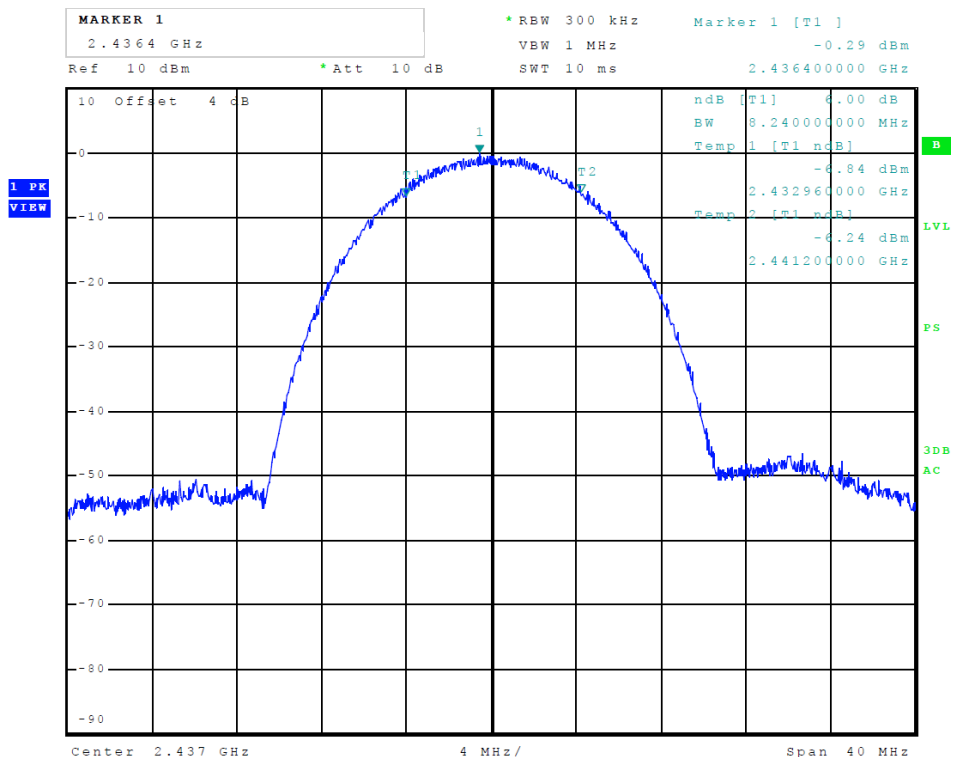


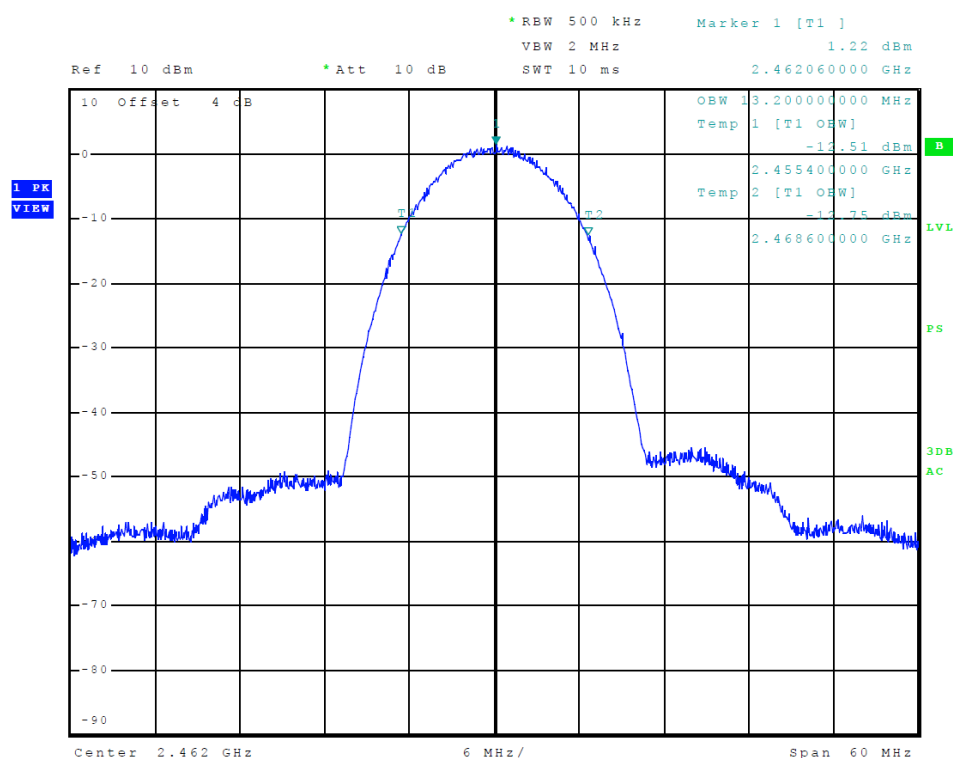
Figure 10 Plot of Upper Band Edge (802.11 g-mode)



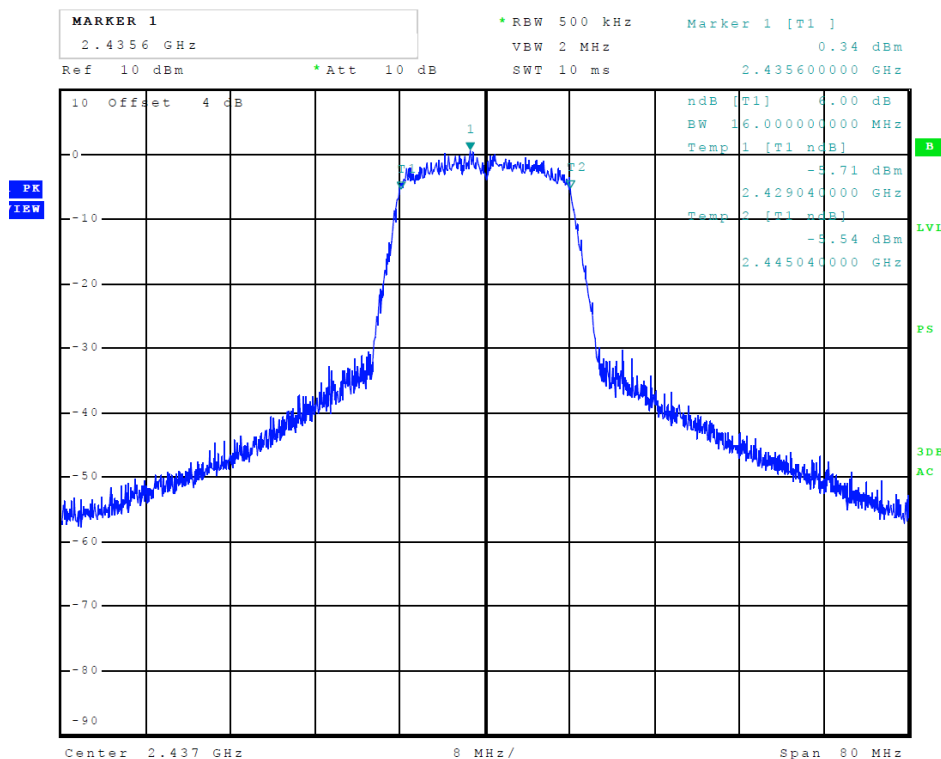
**Figure 11 Plot of Upper Band Edge (802.11 n-mode)**



**Figure 12 Plot of Transmitter 6-dB Occupied Bandwidth (802.11 b-mode)**



**Figure 13 Plot of Transmitter 99% Occupied Bandwidth (802.11 b-mode)**



**Figure 14 Plot of Transmitter 6-dB Occupied Bandwidth (802.11 g-mode)**

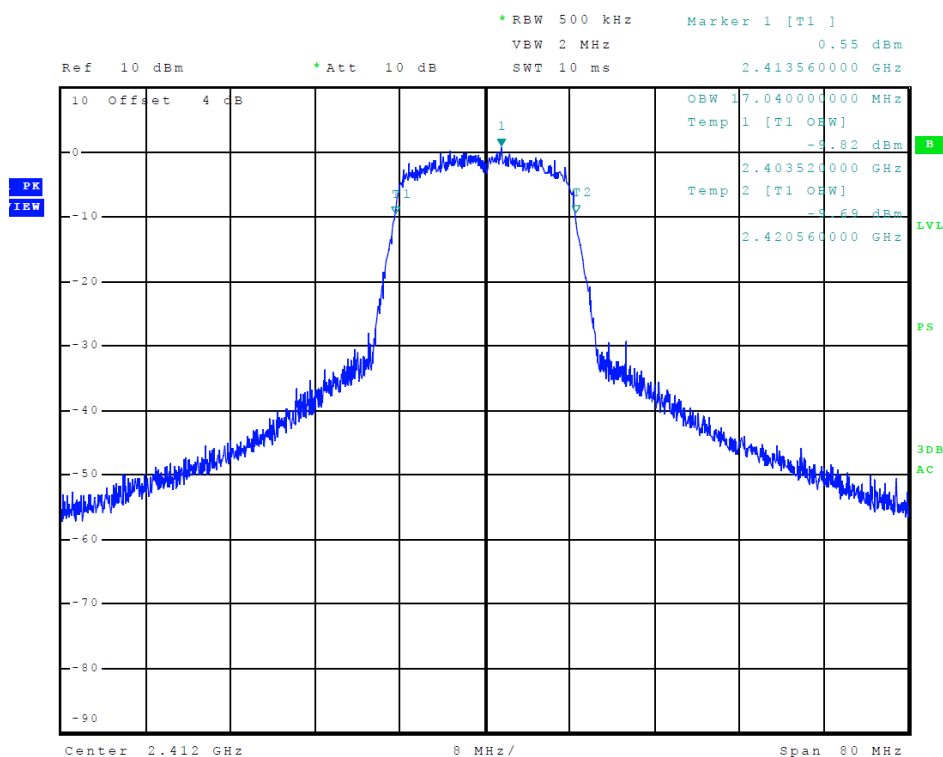


Figure 15 Plot of Transmitter 99% Occupied Bandwidth (802.11 g-mode)

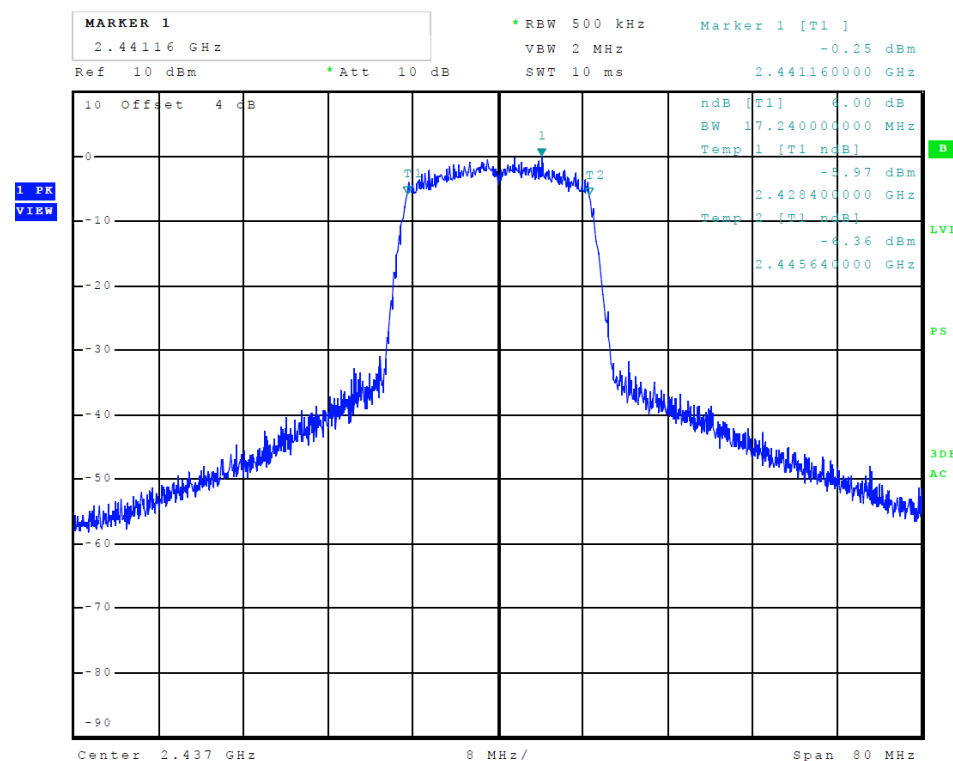
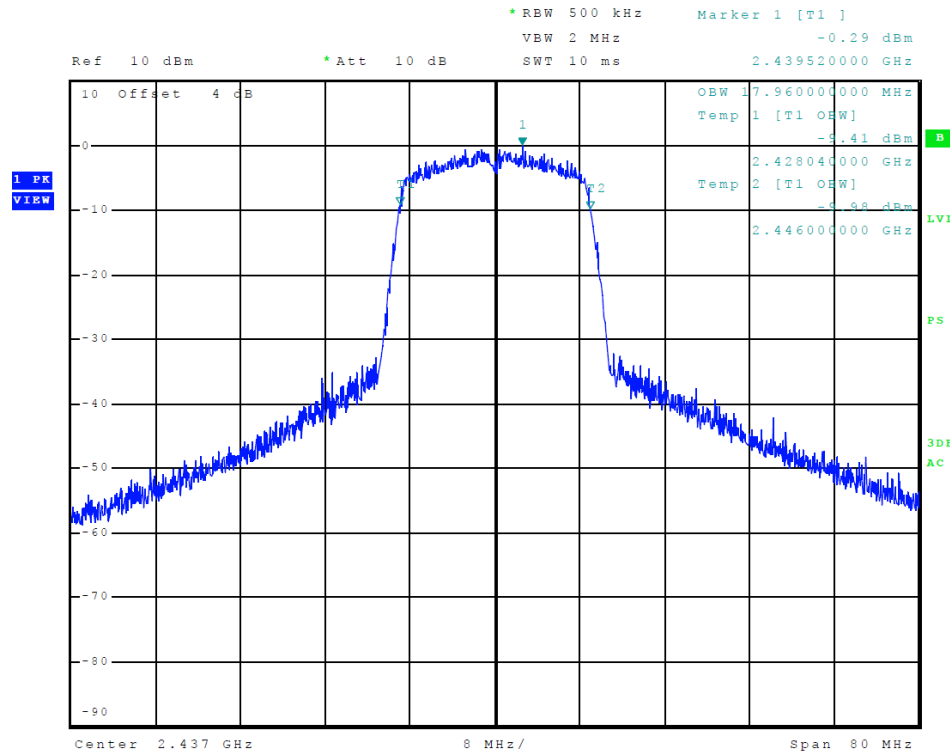


Figure 16 Plot of Transmitter 6-dB Occupied Bandwidth (802.11 n-mode)



**Figure 17 Plot of Transmitter 99% Occupied Bandwidth (802.11 n-mode)**

## Transmitter Emissions Data

**Table 5 Transmitter Radiated Emission Worst-case Data**

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)
2412.0	--	--	--	--	--
4824.0	47.4	33.7	48.2	34.7	54.0
7236.0	46.2	33.6	45.6	32.9	54.0
9648.0	45.1	32.5	46.8	34.0	54.0
12060.0	50.6	36.5	49.7	36.7	54.0
14472.0	50.1	36.2	49.4	36.5	54.0
16884.0	52.3	39.7	53.0	40.0	54.0
2437.0	--	--	--	--	--
4874.0	47.3	34.0	48.8	35.4	54.0
7311.0	44.2	31.4	45.7	32.3	54.0
9748.0	47.5	34.2	47.2	34.1	54.0
12185.0	48.8	35.7	48.5	35.8	54.0
14622.0	49.9	36.7	49.7	36.7	54.0
17059.0	53.6	40.6	53.5	40.6	54.0
2462.0	--	--	--	--	--
4924.0	48.3	34.5	46.3	32.6	54.0
7386.0	46.5	32.7	45.4	32.8	54.0
9848.0	47.3	34.5	47.5	34.4	54.0
12310.0	48.8	35.6	48.8	35.6	54.0
14772.0	50.3	37.6	50.1	37.4	54.0
17234.0	54.4	41.1	54.0	41.2	54.0

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

**Table 6 Transmitter Antenna Port Data**

Frequency MHz	Antenna Port Output Power Peak / Ave. (Watts)	99% Occupied Bandwidth (kHz)	6-dB Occupied Bandwidth (kHz)	Peak Power Spectral Density (dBm)
802.11b				
2412	0.006 / 0.003	13200	8300	-4.25
2437	0.006 / 0.003	13200	8240	-3.74
2462	0.006 / 0.003	13200	8200	-3.27
802.11g				
2412	0.015 / 0.005	17040	15960	-6.41
2437	0.015 / 0.006	17000	16000	-6.19
2462	0.016 / 0.006	17000	15960	-5.84
802.11n				
2412	0.015 / 0.005	17960	17220	-6.42
2437	0.015 / 0.005	17960	17240	-6.50
2462	0.016 / 0.005	17960	1720	-6.54

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

The EUT demonstrated compliance with the radiated emissions requirements of CFR47 Part 15.247, RSS-GEN, and RSS-247 Digital Transmission Systems. Antenna port conducted output power of 0.006 Watts average and 0.016 Watts peak was measured at the temporary antenna port of the EUT. The peak power spectral density measured at the antenna port presented a minimum margin of -11.2 dB below the requirements. The EUT demonstrated a minimum margin of -13.1 dB below the harmonic emissions requirements. There were no other significantly measurable emissions in the restricted bands other than those recorded in this report. Other emissions were present with amplitudes at least 20 dB below the requirements. There were no other deviations or exceptions to the requirements.

## Annex

- Annex A Measurement Uncertainty Calculations
- Annex B Rogers Labs Test Equipment List
- Annex C Rogers Qualifications



## 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 <sub>(lab)</sub>
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

## **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			
Spectrum Analyzer: HP 8591EM		5/17	5/18
Antenna: EMCO Biconilog Model: 3143		5/17	5/18
Antenna: Sunol Biconilog Model: JB6		10/16	10/17
Antenna: EMCO Log Periodic Model: 3147		10/16	10/17
Antenna: Com Power Model: AH-118		10/16	10/17
Antenna: Com Power Model: AH-840		5/17	5/18
Antenna: Antenna Research Biconical Model: BCD 235		10/16	10/17
Antenna: Com Power Model: AL-130		10/16	10/17
Antenna: EMCO 6509		10/16	10/17
LISN: Compliance Design Model: FCC-LISN-2.Mod.cd, 50 µHy/50 ohms/0.1 µf		10/16	10/17
R.F. Preamp CPPA-102		10/16	10/17
Attenuator: HP Model: HP11509A		10/16	10/17
Attenuator: Mini Circuits Model: CAT-3		10/16	10/17
Attenuator: Mini Circuits Model: CAT-3		10/16	10/17
Cable: Belden RG-58 (L1)		10/16	10/17
Cable: Belden RG-58 (L2)		10/16	10/17
Cable: Belden 8268 (L3)		10/16	10/17
Cable: Time Microwave: 4M-750HF290-750		10/16	10/17
Cable: Time Microwave: 10M-750HF290-750		10/16	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
ELGAR Model: 1751		2/17	2/18
ELGAR Model: TG 704A-3D		2/17	2/18
ESD Test Set 2010i		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			

## ***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**

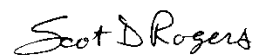
Systems Engineer: A/C Controls Mfg. Co., Inc. 6 Years

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.
- 3) Several Specialized Training courses and seminars pertaining to Microprocessors and Software programming.



Scot D. Rogers