

# Application For Grant of Certification

# FOR

Model: A03337 2402-2480 MHz 47CFR 15.249 and RSS-210 Low Power Transmitter 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: Sot DRogers

Scot D. Rogers

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

Garmin International, Inc. SN Model: A03337 Test #: 170724 Test to: CFR47 15C, RSS-Gen RSS-210 File: A03337 DXX TstRpt 170724 r2

SN's: 5C2000123 / 5C1000155 FCC ID: IPH-03337 IC: 1792A-03337 210 Date: September 20, 2017 Page 1 of 35





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: A03337

Low Power Transmitter Frequency Range 2402-2480 MHz FCC ID: IPH-03337 IC: 1792A-03337

Test Date: July 24, 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:
 5C2000123 / 5C1000155

 4405 West 259<sup>th</sup> Terrace
 Model: A03337
 FCC ID: IPH-03337

 Louisburg, KS 66053
 Test #: 170724
 IC: 1792A-03337

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15C, RSS-Gen RSS-210
 Date: September 20, 2017

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 File: A03337 DXX TstRpt 170724 r2
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# Revisions

Revision 2 Issued September 20, 2017 – corrected type error (HVIN, Page 6) Revision 1 Issued September 18, 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.
	1200 East 151st Street
	Olathe, KS 66062
M/N: A03337	HVIN: A03337

FCC ID: IPH-03337 IC: 1792A-03337

Operating power: 2402-2480 MHz Maximum Average power BT 85.7 dBµV/m @ 3, (and peak 97.3 dBµV/m @ 3 meters), [99% OBW, BT GFSK 828 kHz, BT BLE 1,037.5 kHz, BT 2EDR 1,182.5 kHz, BT 3EDR 1,202.5 kHz]

# **Opinion / Interpretation of Results**

Tests Performed	Margin (dB)	Results
Restricted Bands 47CFR 15.205, RSS-210 2.2	-18.0	Complies
AC Line Conducted 47CFR 15.207, RSS-GEN 8.8	-8.1	Complies
Radiated Emissions 47CFR 15.209, RSS-GEN 8.9	-79	Complies
Harmonic Emissions per 47CFR 15.249, RSS-210 A2.9	-12.6	Complies

Rogers Labs, Inc.	Garmin International, Inc. S	SN's:	5C2000123 / 5C1000155
4405 West 259 <sup>th</sup> Terrace	Model: A03337		FCC ID: IPH-03337
Louisburg, KS 66053	Test #: 170724		IC: 1792A-03337
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# **Equipment Tested**

<u>Equipment</u>	Model / PN	Serial Number
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-В0	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<sup>®</sup> 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

Rogers Labs, Inc.Garmin International, Inc.SN's:5C20004405 West 259th TerraceModel: A03337FCC IIILouisburg, KS 66053Test #: 170724IC: 179Phone/Fax: (913) 837-3214Test to: CFR47 15C, RSS-Gen RSS-210Date: SRevision 2File: A03337 DXX TstRpt 170724 r2Page 7

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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)

Unit under Test	USB Cable 320-00559-0x	Computer USB port	
	320-00337-0X		

## 3) Unit operating off Vehicle AUX power



Rogers Labs, Inc. 4405 West 259 <sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 2	Model: A03337 Test #: 170724 Test to: CFR47 15C, RSS-Gen RSS-2	10	5C2000123 / 5C1000155 FCC ID: IPH-03337 IC: 1792A-03337 Date: September 20, 2017 Page 8 of 35
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# **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 In	struction Manual.	
(4)	Description of Circuit Functions:		
	Refer to Exhibit of Op	perational Description.	
(5)	Block Diagram with Frequencies:		
	Refer to Exhibit of O	perational Description.	
(6)	Report of Measurements:		
	Report of measurement	nts follows in this Report.	
(7)	Photographs: Constru	action, Component Placement, etc.:	
	Refer to Exhibit for pl	notographs 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 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 24, 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

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- $\mu$ Hy choke. EMI was coupled to the spectrum analyzer through a 0.1  $\mu$ F 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.

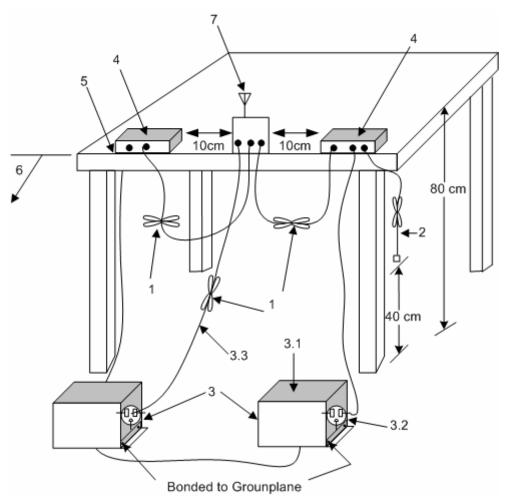
#### **Radiated Emission Test Procedure**

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 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 two and three showing typical test setup. Refer to photographs in the test setup exhibits for specific EUT placement during testing.

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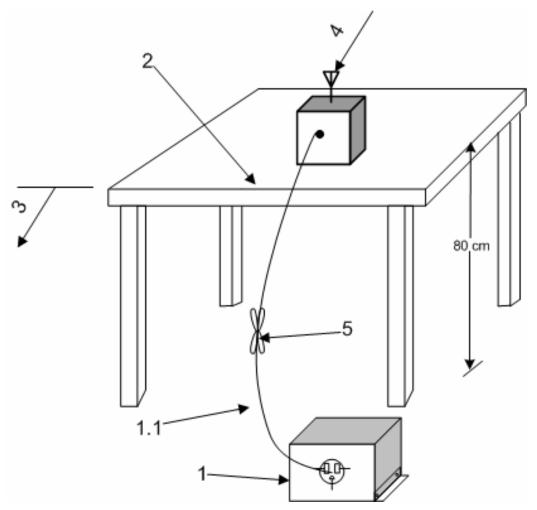


- 1. Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long see (see 6.2.3.1).
- 2. I/O cables that are not connected to an accessory shall be bundled in the center. The end of the cable may be terminated, 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**

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 5C2000123 / 5C1000155
4405 West 259 <sup>th</sup> Terrace	Model: A03337	FCC ID: IPH-03337
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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 2 Test arrangement for radiated emissions of tabletop equipment

Rogers Labs, Inc.	Garmin International, Inc.	SN's:	5C2000123 / 5C1000155
4405 West 259 <sup>th</sup> Terrace	Model: A03337		FCC ID: IPH-03337
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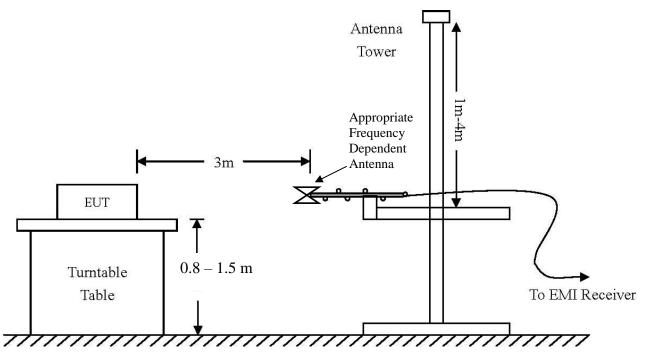


Diagram 3 Test arrangement for radiated emissions tested on Open Area Test Site (OATS)

# **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 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.	,	N's: 5C2000123 / 5C1000155
4405 West 259 <sup>th</sup> Terrace	Model: A03337	FCC ID: IPH-03337
Louisburg, KS 66053	Test #: 170724	IC: 1792A-03337
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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.

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				

Equipment	Manufact	urer_	Model (SN)	Band	Cal Date	Due
🖂 LISN	FCC	FCC-LIS	SN-50-2-10(1PA) (160611)	.15-30MHz	5/17	5/18
🔀 Cable	Time Mic	rowave	750HF290-750 (L10M)	9kHz-40 GHz	10/16	10/17
🔀 Cable	Belden		RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/16	10/17
🔀 Cable	Belden		RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/16	10/17
Antenna	ARA		BCD-235-B (169)	20-350MHz	10/16	10/17
Antenna 🗌	EMCO		3147 (40582)	200-1000MHz	10/16	10/17
🛛 Antenna	ETS-Lind	lgren	3117 (200389)	1-18 GHz	5/17	5/18
Antenna 🗌	Com Pow	er	AH-118 (10110)	1-18 GHz	10/15	10/17
🔀 Antenna	Com Pow	er	AH-840 (101046)	18-40 GHz	5/17	5/18
🔀 Antenna	Com Pow	er	AL-130 (121055)	.001-30 MHz	10/16	10/17
🔀 Antenna	Sunol		JB-6 (A100709)	30-1000 MHz	10/16	10/17
Antenna	EMCO		3143 (9607-1277)	20-1200 MHz	5/17	5/18
Analyzer	HP		8591EM (3628A00871)	9kHz-1.8GHz	5/17	5/18
Analyzer	HP		8562A (3051A05950)	9kHz-110GHz	5/17	5/18
Analyzer	HP Extern	nal Mixer	s11571, 11970	25GHz-110GH	z5/17	5/18
🔀 Analyzer	Rohde &	Schwarz	ESU40 (100108)	20Hz-40GHz	5/17	5/18
Amplifier	Com-Pow	ver	PA-010 (171003)	100Hz-30MHz	10/16	10/17
Amplifier	Com-Pow	ver	CPPA-102 (01254)	1-1000 MHz	10/16	10/17
Amplifier	Com-Pow	ver	PAM-118A (551014)	0.5-18 GHz	10/16	10/17
Power Mtr	Agilent		N1911A with N1921A	0.05-18 GHz	5/16	5/17

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# **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	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 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 and production units offer no provision for connection to alternate antenna system. The antenna connection point complies with the unique antenna connection requirements. The unique antenna connection requirements are fulfilled. There are no deviations or exceptions to the specification.

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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 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	41.9	N/A	28.8	43.6	N/A	28.7	54.0
2483.5	43.0	N/A	29.5	42.3	N/A	29.3	54.0
4804.0	44.5	N/A	31.5	44.5	N/A	31.4	54.0
4882.0	44.4	N/A	31.6	45.1	N/A	31.6	54.0
4960.0	44.4	N/A	31.7	44.4	N/A	31.7	54.0
7206.0	45.1	N/A	32.4	46.1	N/A	32.6	54.0
7323.0	46.4	N/A	32.8	45.8	N/A	32.7	54.0
7440.0	45.7	N/A	32.9	45.8	N/A	33.1	54.0
12010.0	48.4	N/A	35.9	49.2	N/A	35.9	54.0
12205.0	48.7	N/A	35.8	49.6	N/A	36.0	54.0
12400.0	48.4	N/A	35.7	48.6	N/A	35.5	54.0

 Table 1 Radiated Emissions in Restricted Frequency Bands Data (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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#### 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 demonstrated a worst-case minimum margin of -18.0 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.

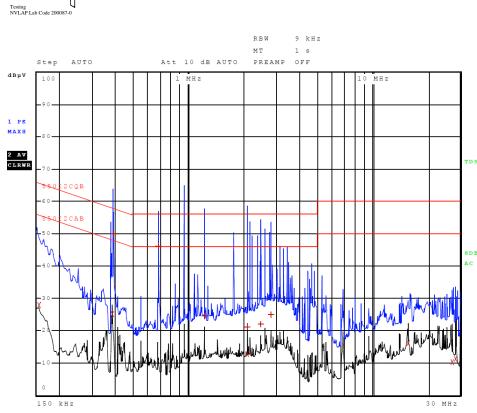
#### AC Line Conducted Emissions Procedure

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 µF 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 wile interfaced with the EUT.

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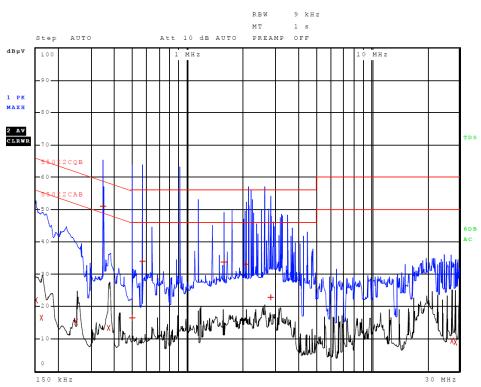


Figure 2 AC Line Conducted emissions of EUT line 2 (EUT–USB-CPU)

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

Trace	Frequenc	у	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
0.1	• • • • • • • • • • •	1. 1	(1) (00 ID 1 1	.1 1	

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

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

Trace	Frequenc	у	Level (dBµ\	/) 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	2.83000000	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.

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4405 West 259 <sup>th</sup> Terrace	Model: A03337	FCC ID: IPH-03337
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### **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 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.

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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 -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

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. 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 placement, raising, and lowering the FSM antenna, changing the antenna polarization, and by rotating the turntable by varying the FSM antenna height, 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  $dB\mu V/m @ 3$  meters.

Refer to figures five through eight showing plots taken of the 2402-2480 MHz, ANT GFSK modulation, figures nine through twelve showing plots of the BT GFSK modulation performance, and figures thirteen through sixteen showing plots taken of the BT 2EDR, and figures seventeen through twenty showing plots taken of the BT 3EDR modulation performance displaying compliance with the specifications.

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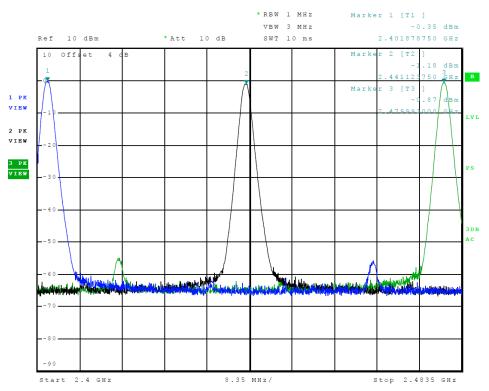


Figure 3 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, BT GFSK)



Figure 4 Plot of Transmitter Emissions (99% Occupied Bandwidth, BT GFSK)

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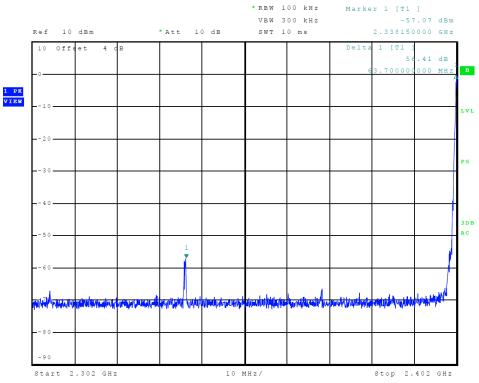


Figure 5 Plot of Transmitter Emissions (Low Band Edge, BT GFSK)

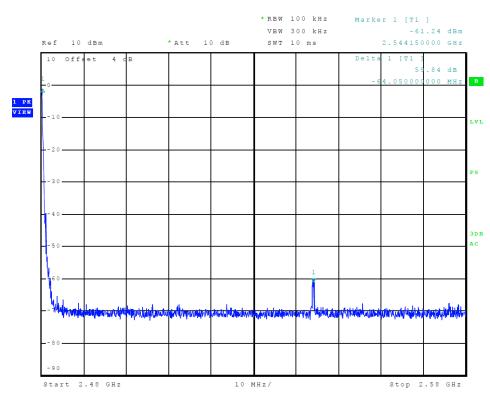


Figure 6 Plot of Transmitter Emissions (High Band Edge, BT GFSK)

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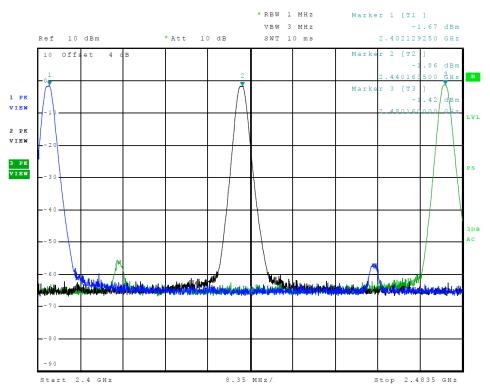


Figure 7 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, BLE)

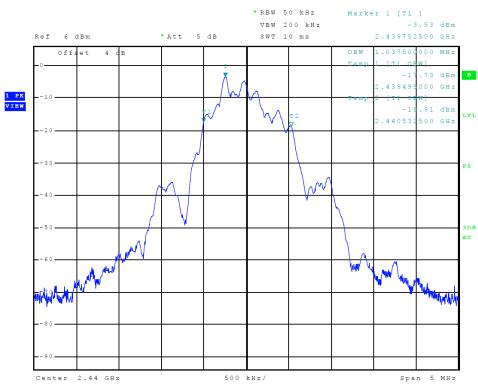


Figure 8 Plot of Transmitter Emissions (99% Occupied Bandwidth, BLE)

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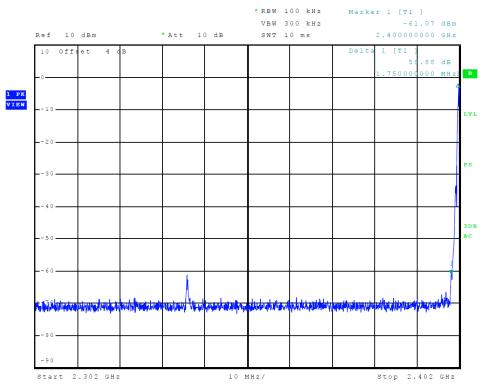


Figure 9 Plot of Transmitter Emissions (Low Band Edge, BLE)

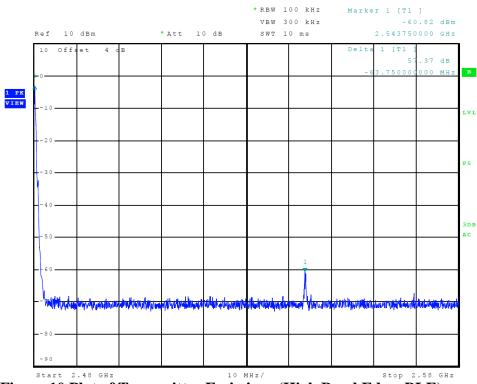


Figure 10 Plot of Transmitter Emissions (High Band Edge, BLE)

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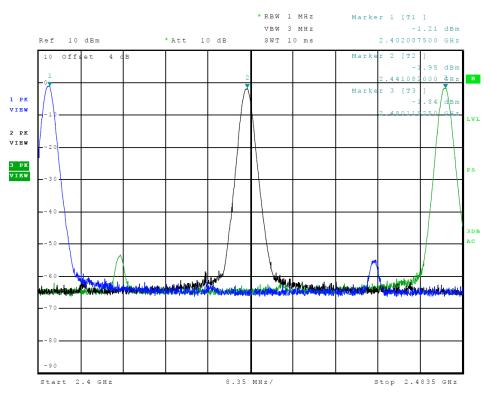


Figure 11 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, BT 2EDR)

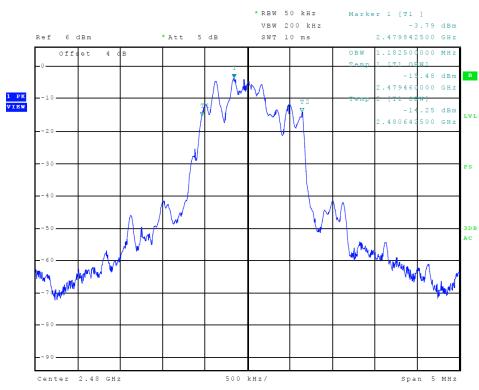


Figure 12 Plot of Transmitter Emissions (99% Occupied Bandwidth, BT 2EDR)

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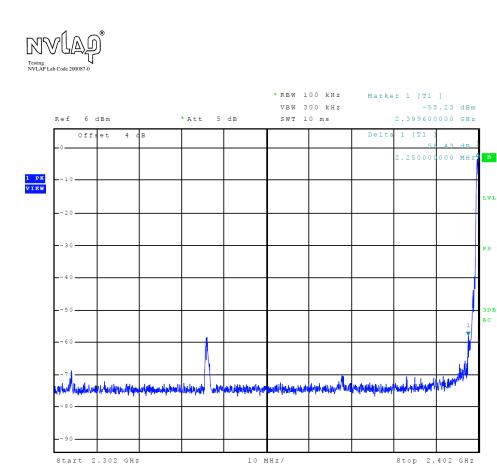


Figure 13 Plot of Transmitter Emissions (Low Band Edge, BT 2EDR)

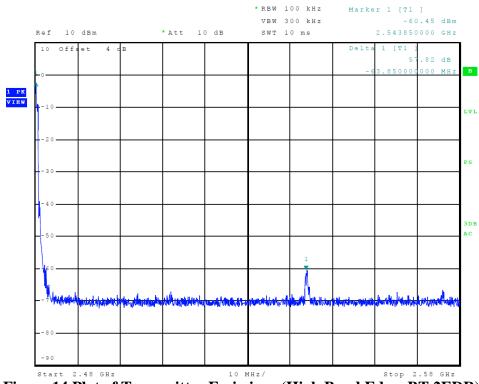


Figure 14 Plot of Transmitter Emissions (High Band Edge, BT 2EDR)

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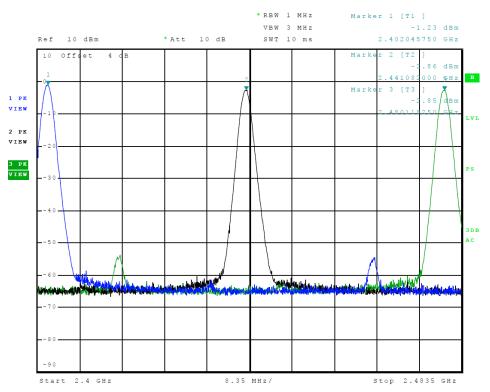


Figure 15 Plot of Transmitter Emissions (Operation in 2402-2480 MHz, 3EDR)

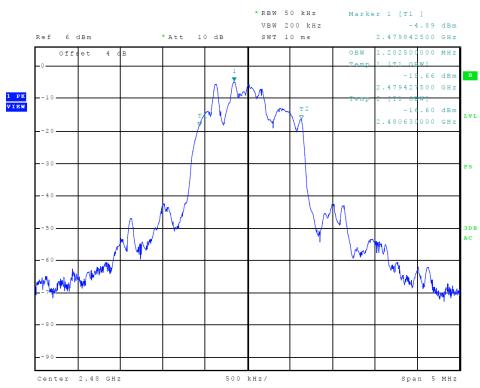


Figure 16 Plot of Transmitter Emissions (99% Occupied Bandwidth, BT 3EDR)

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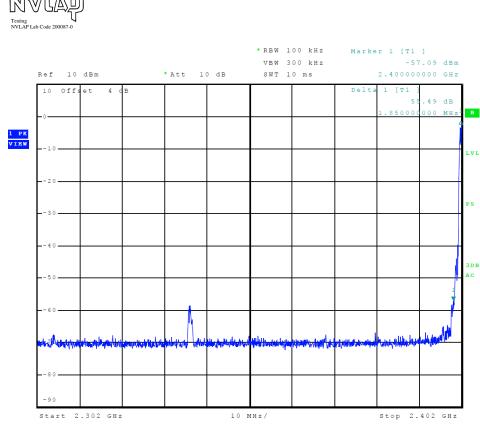


Figure 17 Plot of Transmitter Emissions (Low Band Edge, BT 3EDR)

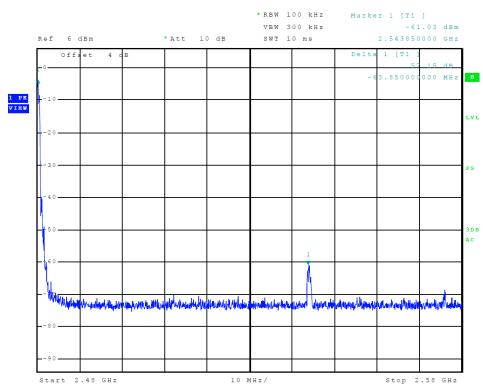


Figure 18 Plot of Transmitter Emissions (High Band Edge, BT 3EDR)

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# Transmitter 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)
2402.0	97.3	N/A	85.7	92.4	N/A	81.3	94.0
4804.0	44.5	N/A	31.5	44.5	N/A	31.4	54.0
7206.0	45.1	N/A	32.4	46.1	N/A	32.6	54.0
9608.0	46.7	N/A	33.8	45.7	N/A	33.2	54.0
12010.0	48.4	N/A	35.9	49.2	N/A	35.9	54.0
14412.0	50.5	N/A	37.8	50.6	N/A	37.8	54.0
16814.0	53.5	N/A	40.3	53.1	N/A	40.3	54.0
2441.0	95.8	N/A	83.7	90.5	N/A	78.4	94.0
4882.0	44.4	N/A	31.6	45.1	N/A	31.6	54.0
7323.0	46.4	N/A	32.8	45.8	N/A	32.7	54.0
9764.0	46.5	N/A	33.1	46.4	N/A	33.8	54.0
12205.0	48.7	N/A	35.8	49.6	N/A	36.0	54.0
14646.0	5.1	N/A	37.0	50.0	N/A	37.0	54.0
17087.0	55.0	N/A	41.4	54.0	N/A	41.4	54.0
2480.0	94.9	N/A	83.6	91.5	N/A	80.3	94.0
4960.0	44.4	N/A	31.7	44.4	N/A	31.7	54.0
7440.0	45.7	N/A	32.9	45.8	N/A	33.1	54.0
9920.0	46.5	N/A	33.9	47.0	N/A	34.2	54.0
12400.0	48.4	N/A	35.7	48.6	N/A	35.5	54.0
14880.0	49.7	N/A	36.7	49.4	N/A	36.7	54.0
17360.0	54.2	N/A	41.0	54.3	N/A	41.4	54.0

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.

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

The EUT demonstrated compliance with the radiated emissions requirements of 47CFR Part 15.249, Industry Canada RSS-GEN issue 4, RSS-210 issue 9. The EUT worst-case test sample configuration demonstrated minimum average margin of -8.3 dB below the average emission limit for the fundamental. The EUT worst-case configuration demonstrated minimum radiated harmonic emission margin of -12.6 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.

Rogers Labs, Inc.Garmin International, Inc.SN's:4405 West 259th TerraceModel: A03337Louisburg, KS 66053Test #: 170724Phone/Fax: (913) 837-3214Test to: CFR47 15C, RSS-Gen RSS-210Revision 2File: A03337 DXX TstRpt 170724 r2

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# Annex

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

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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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 SN's:
 5C2000123 / 5C1000155

 4405 West 259<sup>th</sup> Terrace
 Model: A03337
 FCC ID: IPH-03337

 Louisburg, KS 66053
 Test #: 170724
 IC: 1792A-03337

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15C, RSS-Gen RSS-210
 Date: September 20, 2017

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# Annex B Rogers Labs Test Equipment List

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 1		5/17	5/18
Mixers: 11517A, 11970A, 11970K, 11970U, 11970V, 1197	70W		
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/5	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			

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 5C2000123 / 5C1000155
4405 West 259 <sup>th</sup> Terrace	Model: A03337	FCC ID: IPH-03337
Louisburg, KS 66053	Test #: 170724	IC: 1792A-03337
Phone/Fax: (913) 837-3214	Test to: CFR47 15C, RSS-Gen RSS-	210 Date: September 20, 2017
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# 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 2

Garmin International, Inc. SN Model: A03337 Test #: 170724 Test to: CFR47 15C, RSS-Gen RSS-210 File: A03337 DXX TstRpt 170724 r2

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