



ROGERS LABS, INC.

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

Application For Grant of Certification

47 CFR, PART 15C - Intentional Radiators 47 CFR Paragraph 15.249 and Industry Canada RSS-GEN Issue 5 and RSS-210 Issue 10

Model: A03970 2402-2480 MHz (DXX) Low Power Digital Transmitter

FCC ID: IPH-03970

IC: 1792A-03970

Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

FCC Designation: US5305 ISED Registration: 3041A-1 Test Report Number: 200107

Test Date: January 7, 2020

Authorized Signatory: Scot DRogers

Scot D. Rogers

This report shall not be reproduced except in full, without the written approval of the laboratory. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the U.S. Government.

Rogers Labs, Inc. Garmin International, Inc. 4405 West 259th Terrace Model: A03970 Louisburg, KS 66053 Test: 200107

FCC ID: IPH-03970 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

SN's: 3319367940, 3319367953

Revision 1 File: A03970 DXX TstRpt 200107 Page 1 of 46



Table of Contents

TABLE OF CONTENTS	2
REVISIONS	4
FOREWORD	5
OPINION / INTERPRETATION OF RESULTS	5
EQUIPMENT TESTED	6
Equipment Function	7
Equipment Configuration	8
APPLICATION FOR CERTIFICATION	9
APPLICABLE STANDARDS & TEST PROCEDURES	10
TESTING PROCEDURES	10
AC Line Conducted Emission Test Procedure	10
Radiated Emission Test Procedure	10
Antenna Port Conducted Emission Test Procedure	11
Diagram 1 Test arrangement for Conducted emissions	12
Diagram 2 Test arrangement for radiated emissions of tabletop equipment	13
Diagram 3 Test arrangement for radiated emissions tested on Open Area Test Site (OATS)	14
Diagram 4 Test arrangement for Antenna Port Conducted emissions	15
TEST SITE LOCATIONS	15
LIST OF TEST EQUIPMENT	16
UNITS OF MEASUREMENTS	17
ENVIRONMENTAL CONDITIONS	17
STATEMENT OF MODIFICATIONS AND DEVIATIONS	17
INTENTIONAL RADIATORS	18

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107 SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107 Page 2 of 46



Antenna Requirements	18
Restricted Bands of Operation	18
Table 1 Radiated Emissions in Restricted Frequency Bands Data Mode 1 ANT (GFSK)	19
Table 2 Radiated Emissions in Restricted Frequency Bands Data Mode 2 BLE (GMSK)	20
Summary of Results for Radiated Emissions in Restricted Bands	20
AC Line Conducted EMI Procedure	21
Figure 1 AC Line Conducted emissions of EUT line 1 Configuration #2	22
Figure 2 AC Line Conducted emissions of EUT line 2 Configuration #2	23
Figure 3 AC Line Conducted emissions of EUT line 1 Configuration #3	24
Figure 4 AC Line Conducted emissions of EUT line 2 Configuration #3	25
Table 3 AC Line Conducted Emissions Data L1 (configuration #2, EUT – 362-00087-00)	26
Table 4 AC Line Conducted Emissions Data L2 (configuration #2, EUT – 362-00087-00)	26
Table 5 AC Line Conducted Emissions Data L1 (configuration #3, EUT – Computer)	27
Table 6 AC Line Conducted Emissions Data L2 (configuration #3, EUT – Computer)	27
Summary of Results for AC Line Conducted Emissions Results	28
General Radiated Emissions Procedure	28
Table 7 General Radiated Emissions Data Configuration #1	29
Summary of Results for General Radiated Emissions	29
Operation in the Band 2400 – 2483.5 MHz	30
Figure 5 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 1 ANT (GFSK)	31
Figure 6 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 1 ANT (GFSK)	32
Figure 7 Plot of Transmitter Emissions Low Band Edge Mode 1 ANT (GFSK)	33
Figure 8 Plot of Transmitter Emissions High Band Edge Mode 1 ANT (GFSK)	34
Figure 9 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 2 BLE (GMSK)	35
Figure 10 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 2 BLE (GMSK)	36
Figure 11 Plot of Transmitter Emissions Low Band Edge Mode 2 BLE (GMSK)	37
Figure 12 Plot of Transmitter Emissions High Band Edge Mode 2 BLE (GMSK)	38
Transmitter Emissions Data	39
Table 8 Transmitter Radiated Emissions Mode 1 ANT (GFSK)	39
Table 9 Transmitter Radiated Emissions Mode 2 BLE(GMSK)	40

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

Garmin International, Inc. Model: A03970 Test: 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107 Page 3 of 46



Summary of Results for Transmitter Radiated Emissions of Intentional Radiator	41
ANNEX	42
Annex A Measurement Uncertainty Calculations	43
Annex B Additional Test Equipment	44
Annex C Rogers Qualifications	45
Annex D Laboratory Certificate of Accreditation	46

Revisions

Revision 1 Issued January 29, 2020

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Page 4 of 46



Foreword

The following information is submitted for consideration in obtaining Grant of Certification for low power intentional radiator per the eCFR Title 47 Federal Communications Code of Federal Regulations (47 CFR) dated January 7, 2020, Industry Canada RSS-210 Issue 10 and RSS-GEN Issue 5, low power digital device transmitter operations in the 2400 – 2483.5 MHz frequency band.

Name of Applicant: Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

M/N: A03970

FCC ID: IPH-03970 IC: 1792A-03970 Operating Frequency Range: 2402-2480 MHz

Operational communication modes

Mode	Peak Power (dBµV/m@3m)	Average power (dBµV/m@3m)	99% OBW (kHz)
Mode 1 ANT (GFSK)	98.5	70.8	473.6
Mode 2 BLE (GMSK)	100.4	93.9	1,307.7

This report addresses EUT Operations as Low Power Device using Bluetooth® Basic Rate (GFSK)

Opinion / Interpretation of Results

Tests Performed	Margin (dB)	Results
Restricted Bands 47 CFR 15.205, RSS-210 4.1	-7.3	Complies
AC Line Conducted 47 CFR 15.207, RSS-GEN 8.8	-4.8	Complies
Radiated Emissions 47 CFR 15.209, RSS-GEN 8.9	-11.6	Complies
Harmonic Emissions per 47 CFR 15.249, RSS-210 B.10	-3.1	Complies

Rogers Labs, Inc. Garmin International, Inc. SN's: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970

Louisburg, KS 66053 Test: 200107 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 5 of 46



Equipment Tested

Model: A03970

<u>Equipment</u>	Model / PN	Serial Number
EUT #1	A03970	3319367940
EUT #2	A03970	3319367953
USB Cable	320-00559-00	N/A
AC Adapter	362-00087-00	N/A
Laptop Computer	Latitude E6320	FCN13Q1
USB Printer	Dell 0N5819	5D1SL61

Test results in this report relate only to the items tested

Operational communication modes

Mode	Transmitter Operation
1	ANT (GFSK)
2	BLE (GMSK)

Software Version Ver 54, Power setting: 4dBm

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

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3319367940, 3319367953

 4405 West 259th Terrace
 Model: A03970
 FCC ID: IPH-03970

 Louisburg, KS 66053
 Test: 200107
 IC: 1792A-03970

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 6 of 46



Equipment Function

The EUT is a GPS receiver and display unit providing GPS reception and display of navigation and other information to the user. The EUT offers use as a hand-held, portable, or transportation mounted configuration for use in navigational and digital applications. The design offers cabled and wireless interface capabilities for use with compatible equipment. The design incorporates transmitter circuitry operating in the 2402-2480 MHz band. The EUT provides a single USB interface port for cabled communications and power to recharge internal battery. The product operates from internal rechargeable battery only and requires battery recharge through the provided USB interface cable and compatible USB power source. 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 the integral 2.4 GHz antenna with RF connection port. The test samples were provided with test software (Version 54) enabling testing personnel the ability to enable transmitter functions on defined modulations and channels. The test software enabled near 100% transmit duty cycle for testing purposes. The production product will not operate near this high of duty cycle to conserve battery life. The antenna modification offered testing facility the ability to connect test equipment to the temporary 2.4 GHz antenna port. 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/or AC power configurations and configured to operate in available modes. As requested by the manufacturer the equipment was tested for compliance using the available configurations with the worst-case data presented. This report documents the performed testing and results for applicable configurations and product modes of operation. Test results in this report relate only to the products described in this report.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Revision 1

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

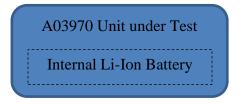
IC: 1792A-03970

Page 7 of 46

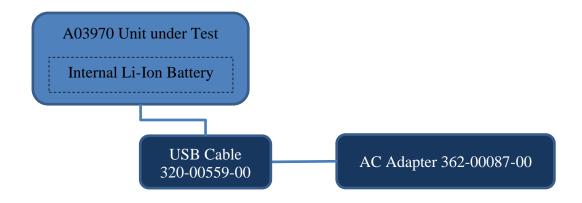


Equipment Configuration

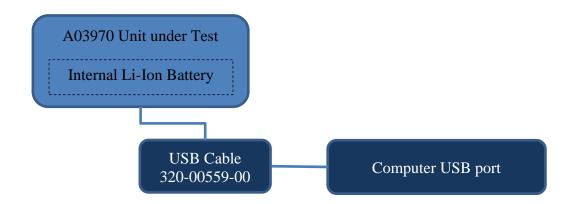
1) Unit operating off internal battery



2) Unit connected to (and powered by) AC adapter through USB cable (GPN: 320-00559-00)



3) Unit connected to Computer USB port through cable assembly (GPN: 320-00559-10)



Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Revision 1

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

IC: 1792A-03970

Page 8 of 46

SN's: 3319367940, 3319367953

FCC ID: IPH-03970



Application for Certification

(1) Manufacturer: Garmin International, Inc.

1200 East 151st Street

Olathe, KS 66062

(2) Identification: M/N: A03970

FCC ID: IPH-03970 IC: 1792A-03970

(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 internal rechargeable battery. The design provides interface option with compatible USB cable and equipment as presented in this filing. The EUT offers no other connection ports than those presented in this filing.
- (9) Transition Provisions of 47 CFR 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.

Rogers Labs, Inc. Garmin International, Inc. SN's: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970

Louisburg, KS 66053 Test: 200107 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 9 of 46



Applicable Standards & Test Procedures

The following information is submitted in accordance with the eCFR Title 47 Federal Communications Code of Federal Regulations (47 CFR) dated January 7, 2020: 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 10, and RSS-GEN Issue 5 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.

Testing Procedures

AC Line Conducted Emission Test Procedure

Testing for the AC line-conducted emissions was performed as defined 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

Radiated emissions testing was performed as required in 47 CFR 15C, RSS-210 Issue 10, and specified in ANSI C63.10-2013. 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. 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.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

File: A03970 DXX TstRpt 200107 Page 10 of 46



Antenna Port Conducted Emission Test Procedure

The EUT was assembled as required for operation placed on a benchtop. This configuration provided the ability to connect test equipment to the provided test antenna port Antenna Port conducted emissions testing was performed presented in the regulations and specified in ANSI C63.10-2013. Testing was completed on a laboratory bench in a shielded room. The active antenna port of the device was connected to appropriate attenuation and the spectrum analyzer. Refer to diagram four showing typical test arrangement and photographs in the test setup exhibits for specific EUT placement during testing.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214

File: A03970 DXX TstRpt 200107

Garmin International, Inc.

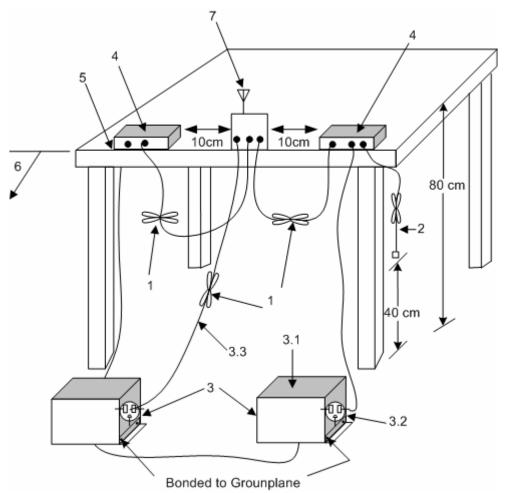
Model: A03970

Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Page 11 of 46





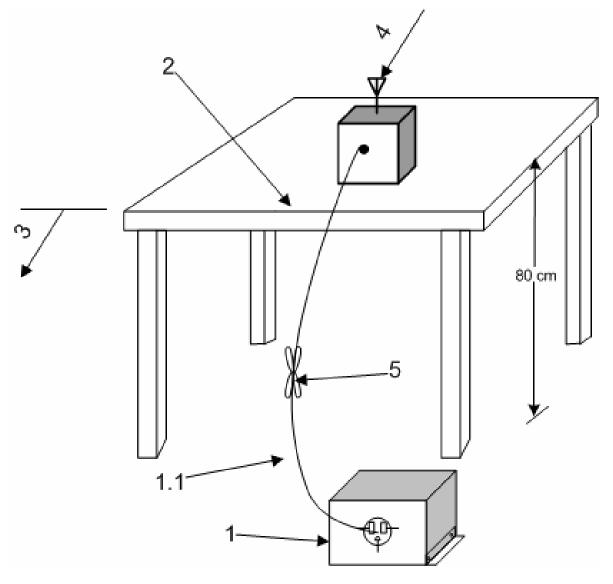
- 1. Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long see (see 6.2.3.1).
- 2. I/O cables that are not connected to an accessory shall be bundled in the center. The end of the cable may be terminated, 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 Ω 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: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970 Louisburg, KS 66053 Test: 200107 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 Pagistion 1 File: A03070 DVX TetPart 200107 Page 12 of 46

Revision 1 File: A03970 DXX TstRpt 200107 Page 12 of 46





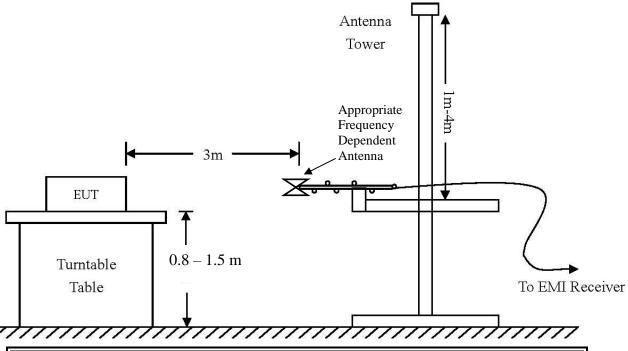
- 1—A LISN is optional for radiated measurements between 30 MHz and 1000 MHz but not allowed for measurements below 30 MHz and above 1000 MHz (see 6.3.1). If used, then connect EUT to one LISN. Unused LISN measuring port connectors shall be terminated in 50 Ω loads. The LISN may be placed on top of, 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: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970 Louisburg, KS 66053 Test: 200107 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File A03070 DNY Test 200107

Revision 1 File: A03970 DXX TstRpt 200107 Page 13 of 46





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			

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

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107 Page 14 of 46



Spectrum Analyzer

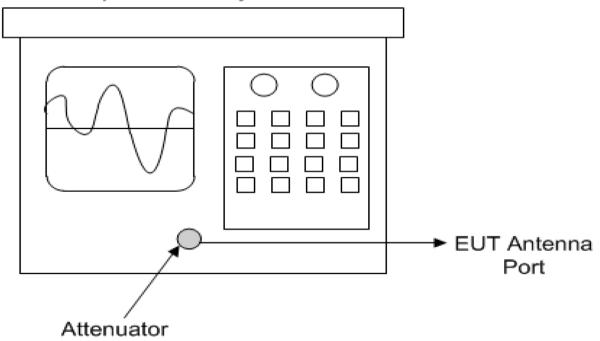


Diagram 4 Test arrangement for Antenna Port Conducted emissions

Test Site Locations

Conducted EMI AC line conducted emissions testing performed in a shielded screen room

located at Rogers Labs, Inc., 4405 West 259th Terrace, Louisburg, KS

Antenna port Antenna port conducted emissions testing was 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

Registered Site information: FCC Site: US5305, ISED: 3041A, CAB Identifier: US0096

NVLAP Accreditation Lab code 200087-0

Rogers Labs, Inc. Garmin International, Inc. SN's: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970 Louisburg, KS 66053 Test: 200107 IC: 1792A-03970

Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 15 of 46



List of Test Equipment

Equipment	<u>Manufacturer</u>	Model (SN)	Band Ca	al Date(m/d/y	<u>) Due</u>
\boxtimes LISN	FCC FCC-LIS	SN-50-25-10(1PA) (160611)	.15-30MHz	4/18/2019	4/18/2020
\boxtimes LISN	Compliance Design	FCC-LISN-2.Mod.cd,(126)	.15-30MHz	10/14/2019	10/14/2020
□ Cable	Huber & Suhner Inc.	Sucoflex102ea(L10M)(3030	73)9kHz-40 GHz	10/14/2019	10/14/2020
⊠ Cable	Huber & Suhner Inc.	Sucoflex102ea(1.5M)(30306	9)9kHz-40 GHz	10/14/2019	10/14/2020
□ Cable	Huber & Suhner Inc.	Sucoflex102ea(1.5M)(30307	1)9kHz-40 GHz	10/14/2019	10/14/2020
⊠ Cable	Belden	RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/14/2019	10/14/2020
⊠ Cable	Belden	RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/14/2019	10/14/2020
	Com Power	AL-130 (121055)	.001-30 MHz	10/14/2019	10/14/2020
☐ Antenna:	EMCO	6509	.001-30 MHz	10/16/2018	10/16/2020
☐ Antenna	ARA	BCD-235-B (169)	20-350MHz	10/14/2019	10/14/2020
☐ Antenna:	Schwarzbeck Model	: BBA 9106/VHBB 9124 (912	24-627)	4/18/2019	4/18/2021
	Sunol	JB-6 (A100709)	30-1000 MHz	10/14/2019	10/14/2020
☐ Antenna	ETS-Lindgren	3147 (40582)	200-1000MHz	10/14/2019	10/14/2020
☐ Antenna:	Schwarzbeck Model	: VULP 9118 A (VULP 9118	A-534)	4/18/2019	4/18/2021
	ETS-Lindgren	3117 (200389)	1-18 GHz	5/02/2019	5/2/2020
☐ Antenna	Com Power	AH-118 (10110)	1-18 GHz	10/14/2019	10/14/2020
	Com Power	AH-840 (101046)	18-40 GHz	4/18/2019	4/18/2021
	Rohde & Schwarz	ESU40 (100108)	20Hz-40GHz	4/18/2019	4/18/2020
	Rohde & Schwarz	ESW44 (101534)	20Hz-44GHz	1/31/2019	1/31/2020
☐ Analyzer	Rohde & Schwarz	FS-Z60, 90, 140, and 220	40GHz-220GHz	12/22/2017	12/22/2027
	Com-Power	PA-010 (171003)	100Hz-30MHz	10/14/2019	10/14/2020
	Com-Power	CPPA-102 (01254)	1-1000 MHz	10/14/2019	10/14/2020
	Com-Power	PAM-118A (551014)	0.5-18 GHz	10/14/2019	10/14/2020
	Com-Power	PAM-840A (461328)	18-40 GHz	10/14/2019	10/14/2020
☐ Power Mete	r Agilent	N1911A with N1921A	0.05-40 GHz	4/18/2019	4/18/2020
☐ Generator	Rohde & Schwarz	SMB100A6 (100150)	20Hz-6 GHz	4/18/2019	4/18/2020
☐ Generator	Rohde & Schwarz	SMBV100A6 (260771)	20Hz-6 GHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRC50722 (009).9G notch	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50114 (017)1.5G HPF	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50117 (063) 3G HPF	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50105 (059) 6G HPF	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRM50702 (172) 2G notch	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRC50703 (G102) 5G notch	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRC50705 (024) 5G notch	30-18000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Fairview	SA6NFNF100W-40 (1625)	30-18000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-3W2+ (1436)	30-6000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-3W2+ (1445)	30-6000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/18/2019	4/18/2020
\square Attenuator	Mini-Circuits	VAT-6W2+ (1438)	30-6000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-6W2+ (1736)	30-6000 MHz	4/18/2019	4/18/2020
⊠ Weather stat	ion Davis	6312 (A81120N075)		11/4/2019	11/4/2020

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3319367940, 3319367953

 4405 West 259th Terrace
 Model: A03970
 FCC ID: IPH-03970

 Louisburg, KS 66053
 Test: 200107
 IC: 1792A-03970

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 16 of 46



Units of Measurements

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

Antenna port Conducted Data is in dBm; dB referenced to one milliwatt

Radiated EMI Data presented in dBµV/m; dB referenced to one microvolt per meter

Note: Radiated limit may be expressed for measurement in $dB\mu V/m$ when the measurement is taken at a distance of 3 or 10 meters. Data taken for this report was taken at distance of 3 meters. Sample calculation demonstrates corrected field strength reading for Open Area Test Site using the measurement reading and correcting for receive antenna factor, cable losses, and amplifier gains.

Sample Calculation:

RFS = Radiated Field Strength, FSM = Field Strength Measured

A.F. = Receive antenna factor, Losses = attenuators/cable losses, Gain = amplification gains

RFS $(dB\mu V/m @ 3m) = FSM (dB\mu V) + A.F. (dB/m) + Losses (dB) - Gain (dB)$

Environmental Conditions

Ambient Temperature 20.8° C

Relative Humidity 35 %

Atmospheric Pressure 1028.4 mb

Statement of Modifications and Deviations

No modifications to the EUT were required for the equipment to demonstrate compliance with the 47 CFR Part 15C, 15.249, Industry Canada RSS-210 Issue 10, and RSS-GEN Issue 5 emission requirements. There were no deviations to the specifications.

Rogers Labs, Inc. Garmin International, Inc. SN's: 3319367940, 3319367953 4405 West 259th Terrace Model: A03970 FCC ID: IPH-03970 Louisburg, KS 66053 Test: 200107 IC: 1792A-03970

Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 17 of 46



Intentional Radiators

The following information is submitted supporting compliance with the requirements of 47 CFR, Subpart C, paragraph 15.249, Industry Canada RSS-210 Issue 10 and RSS-GEN Issue 5.

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.

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.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Revision 1

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Page 18 of 46



Table 1 Radiated Emissions in Restricted Frequency Bands Data Mode 1 ANT (GFSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
2390.0	58.3	45.6	59.2	45.6	54.0	-8.4	-8.4
2483.5	62.6	46.5	63.3	46.5	54.0	-7.5	-7.5
4804.0	49.0	36.1	48.8	36.2	54.0	-17.9	-17.8
4882.0	49.1	35.8	48.7	35.8	54.0	-18.2	-18.2
4960.0	48.8	36.1	49.2	36.1	54.0	-17.9	-17.9
7206.0	52.6	39.6	53.0	39.6	54.0	-14.4	-14.4
7323.0	52.6	39.9	52.7	39.9	54.0	-14.1	-14.1
7440.0	52.8	39.8	53.2	39.9	54.0	-14.2	-14.1
12010.0	58.7	45.3	57.6	45.1	54.0	-8.7	-8.9
12205.0	58.8	45.5	58.3	45.5	54.0	-8.5	-8.5
12400.0	57.8	45.3	58.3	45.4	54.0	-8.7	-8.6

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.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Page 19 of 46



Table 2 Radiated Emissions in Restricted Frequency Bands Data Mode 2 BLE (GMSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
2390.0	58.8	45.7	58.9	45.7	54.0	-8.3	-8.3
2483.5	64.7	46.7	63.4	46.7	54.0	-7.3	-7.3
4804.0	49.2	36.3	49.1	36.3	54.0	-17.7	-17.7
4884.0	48.8	35.9	49.1	36.0	54.0	-18.1	-18.0
4960.0	48.5	36.1	49.2	36.4	54.0	-17.9	-17.6
7206.0	52.0	39.7	53.0	40.0	54.0	-14.3	-14.0
7326.0	52.6	40.0	53.3	40.2	54.0	-14.0	-13.8
7440.0	53.2	40.0	52.5	40.0	54.0	-14.0	-14.0
12010.0	58.4	45.4	59.1	45.4	54.0	-8.6	-8.6
12210.0	58.1	45.6	59.1	45.5	54.0	-8.4	-8.5
12400.0	58.7	45.4	58.0	45.4	54.0	-8.6	-8.6

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 47 CFR Part 15C and RSS-210 Issue 10 Intentional Radiator requirements. The EUT demonstrated a worst-case minimum margin of -7.3 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. 4405 West 259th Terrace Model: A03970 Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 Page 20 of 46 File: A03970 DXX TstRpt 200107



AC Line Conducted EMI Procedure

The EUT was arranged in typical equipment configurations as offered by manufacturer and presented above in equipment configuration. AC Line Conducted emission 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 AC line-conducted emissions followed the procedures of ANSI C63.10-2013. The EUT was configured as presented in the AC Line conducted configurations as directed by the manufacture and presented above in equipment configuration. The AC adapter for the EUT was connected to the LISN for AC 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 and data recorded.

Refer to figures one and two showing plots of configuration #2, (EUT- AC/DC Adapter) worst-case AC line conducted emissions. Refer to figures three and four for plots of configuration #3 (EUT – USB Computer) worst-case AC line conducted emissions.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Page 21 of 46



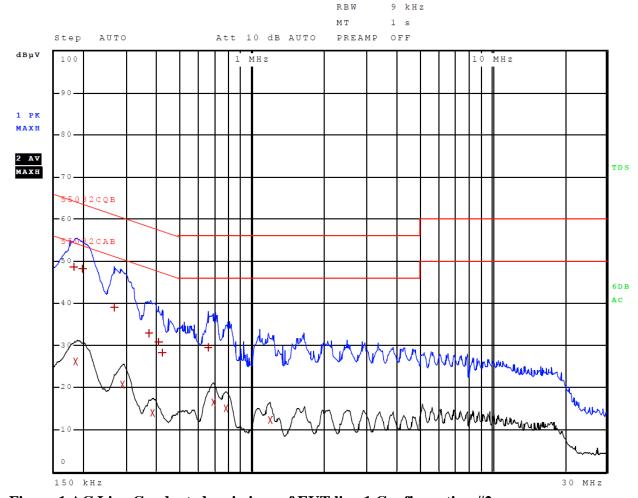


Figure 1 AC Line Conducted emissions of EUT line 1 Configuration #2

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

IC: 1792A-03970

Page 22 of 46



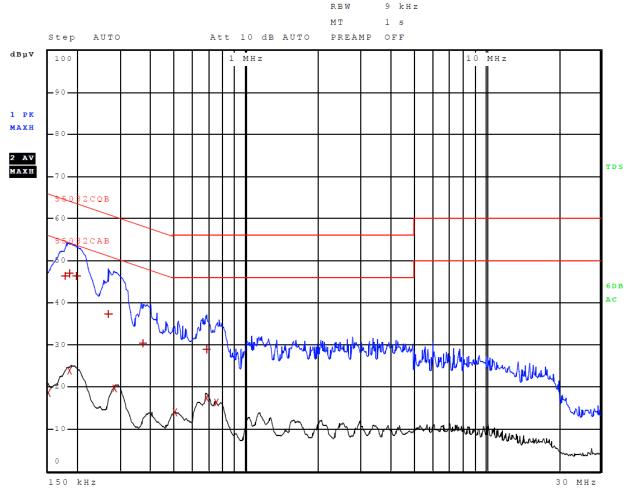


Figure 2 AC Line Conducted emissions of EUT line 2 Configuration #2

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Page 23 of 46



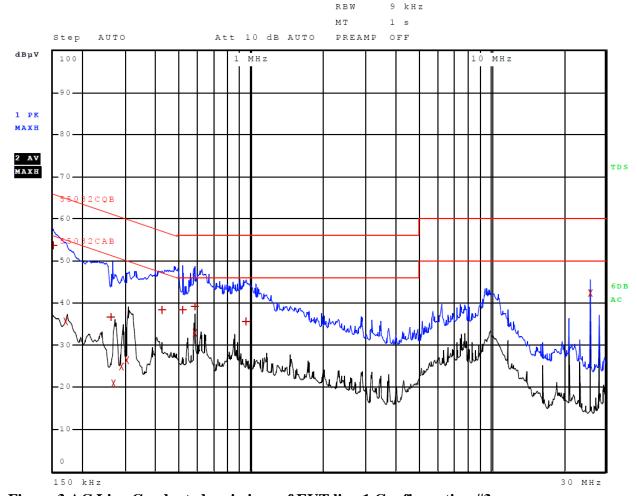


Figure 3 AC Line Conducted emissions of EUT line 1 Configuration #3

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03970 DXX TstRpt 200107 Page 24 of 46



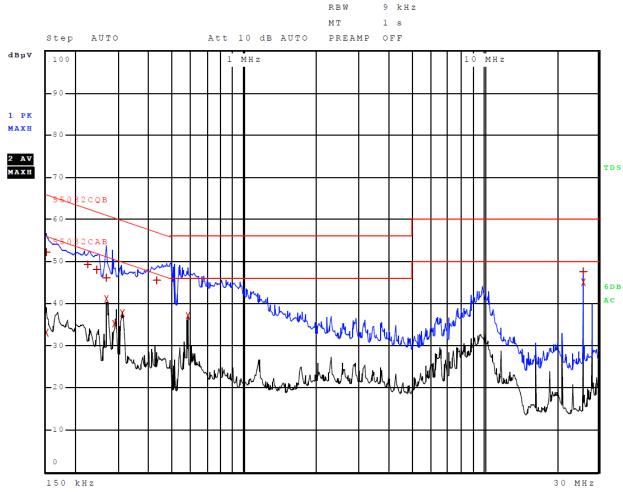


Figure 4 AC Line Conducted emissions of EUT line 2 Configuration #3

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

IC: 1792A-03970

Page 25 of 46



Table 3 AC Line Conducted Emissions Data L1 (configuration #2, EUT – 362-00087-00)

Trace	Frequenc	y	Level (dBµV)) Detector	Delta Limit/dB
1	182.000000000	kHz	48.71	Quasi Peak	- 15.69
2	186.000000000	kHz	26.15	Average	-28.06
1	198.000000000	kHz	48.27	Quasi Peak	- 15.42
1	266.000000000	kHz	39.06	Quasi Peak	-22.18
2	290.000000000	kHz	20.67	Average	-29.85
1	374.000000000	kHz	32.91	Quasi Peak	- 25.51
2	382.000000000	kHz	13.90	Average	-34.34
1	406.000000000	kHz	30.86	Quasi Peak	-26.87
1	418.000000000	kHz	28.19	Quasi Peak	-29.29
1	654.000000000	kHz	29.53	Quasi Peak	-26.47
2	686.000000000	kHz	16.53	Average	-29.47
2	778.000000000	kHz	15.12	Average	-30.88
2	1.182000000	MHz	12.23	Average	- 33.77

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

Table 4 AC Line Conducted Emissions Data L2 (configuration #2, EUT – 362-00087-00)

Trace	Frequency		Frequency Level (dBµV) Detector		Delta Limit/dB
2	150.000000000	kHz	18.67	Average	- 37.33
1	178.000000000	kHz	46.27	Quasi Peak	-18.31
2	186.000000000	kHz	23.91	Average	- 30.30
1	186.000000000	kHz	46.88	Quasi Peak	- 17.33
1	198.000000000	kHz	46.22	Quasi Peak	-17.47
1	266.000000000	kHz	37.34	Quasi Peak	- 23.90
2	286.000000000	kHz	19.61	Average	- 31.03
1	370.000000000	kHz	30.29	Quasi Peak	-28.21
2	502.000000000	kHz	13.98	Average	-32.02
2	682.000000000	kHz	17.35	Average	-28.65
1	682.000000000	kHz	28.79	Quasi Peak	- 27.21
2	746.000000000	kHz	16.34	Average	- 29.66

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

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03970 DXX TstRpt 200107 Page 26 of 46



Table 5 AC Line Conducted Emissions Data L1 (configuration #3, EUT – Computer)

Trace	Frequency		Level (dBµV)) Detector	Delta Limit/dB
1	150.000000000	kHz	53.69	Quasi Peak	-12.31
2	170.000000000	kHz	35.65	Average	-19.31
1	262.000000000	kHz	36.68	Quasi Peak	-24.68
2	270.000000000	kHz	20.85	Average	-30.26
2	290.000000000	kHz	24.97	Average	- 25.56
2	306.000000000	kHz	26.42	Average	-23.66
1	422.000000000	kHz	38.39	Quasi Peak	- 19.02
1	514.000000000	kHz	38.38	Quasi Peak	-17.62
2	578.000000000	kHz	32.84	Average	- 13.16
1	578.000000000	kHz	39.22	Quasi Peak	-16.78
1	950.000000000	kHz	35.54	Quasi Peak	-20.46
2	25.872000000	MHz	42.30	Average	-7.70

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

Table 6 AC Line Conducted Emissions Data L2 (configuration #3, EUT – Computer)

Trace	Frequency		Frequency Level (dBµV) Detector		Delta Limit/dB
1	150.000000000	kHz	52.31	Quasi Peak	- 13.69
2	150.000000000	kHz	32.99	Average	-23.01
1	226.000000000	kHz	49.26	Quasi Peak	-13.34
1	246.000000000	kHz	48.07	Quasi Peak	- 13.83
1	266.000000000	kHz	46.04	Quasi Peak	- 15.20
2	270.000000000	kHz	41.06	Average	-10.05
2	290.000000000	kHz	35.20	Average	- 15.32
2	310.000000000	kHz	37.68	Average	-12.29
1	430.000000000	kHz	45.38	Quasi Peak	- 11.87
2	578.000000000	kHz	37.17	Average	-8.83
2	25.872000000	MHz	45.14	Average	-4.86
1	25.872000000	MHz	47.53	Quasi Peak	- 12.47

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

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107 SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107 Page 27 of 46



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 configurations #2 worst-case configuration demonstrated a minimum margin of -15.4 dB below the requirement. The EUT configuration #3 worst-case configuration demonstrated a minimum margin of -4.8 dB below the requirement. 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 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 on the OATS at 3 meters distance 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.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Page 28 of 46



Table 7 General Radiated Emissions Data Configuration #1

Frequency (MHz)	Horizontal Peak (dBµV/m)	Horizontal Quasi-Peak (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Quasi-Peak (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
38.0	28.9	23.5	35.0	28.4	40.0	-16.5	-11.6
40.6	30.1	25.0	36.7	27.1	40.0	-15.0	-12.9
49.6	26.7	20.9	37.5	28.2	40.0	-19.1	-11.8
57.2	23.0	17.5	31.3	21.1	40.0	-22.5	-18.9
79.3	26.0	19.9	29.9	22.1	40.0	-20.1	-17.9
166.9	29.6	14.7	25.3	19.9	40.0	-25.3	-20.1

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 47 CFR Part 15C paragraph 15.209, RSS-210 Issue 10, and RSS-GEN Issue 5 Intentional Radiators. The EUT demonstrated a minimum margin of -11.6 dB below the requirements. Other emissions were present with amplitudes at least 20 dB below the Limits.

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

Revision 1

Garmin International, Inc. Model: A03970

Test: 200107 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

SN's: 3319367940, 3319367953

FCC ID: IPH-03970

File: A03970 DXX TstRpt 200107 Page 29 of 46



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 worst-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 dBµV/m @ 3 meters.

Refer to figures five through twelve showing plots taken of the 2402-2480 MHz transmitter operation displaying compliance with the specifications.

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

Revision 1

Model: A03970 Test: 200107 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Garmin International, Inc.

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Page 30 of 46 File: A03970 DXX TstRpt 200107



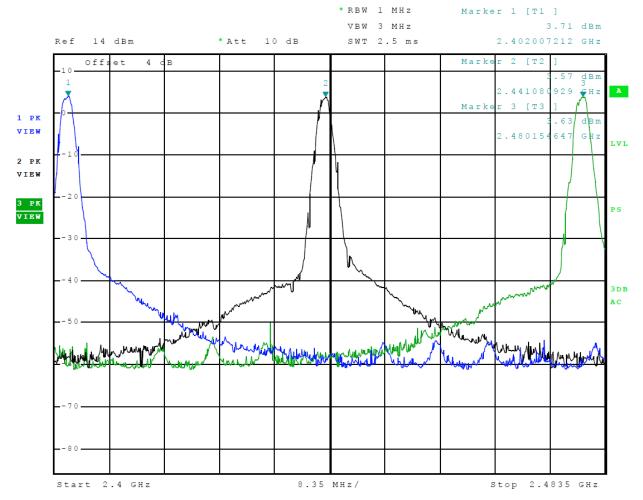


Figure 5 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 1 ANT (GFSK)

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03970

Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

IC: 1792A-03970

Page 31 of 46



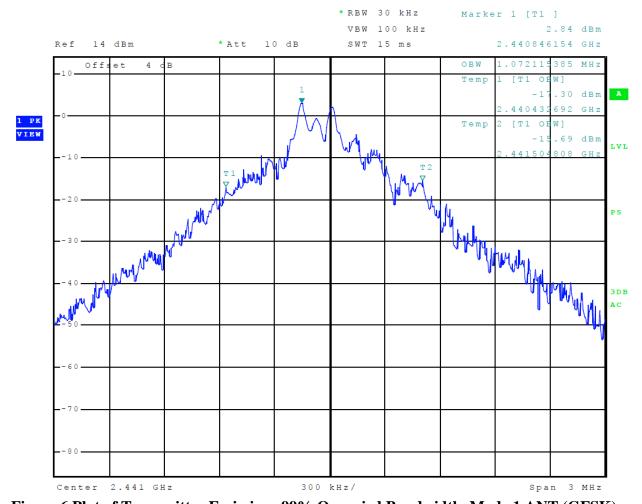


Figure 6 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 1 ANT (GFSK)

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Revision 1

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

IC: 1792A-03970

Page 32 of 46



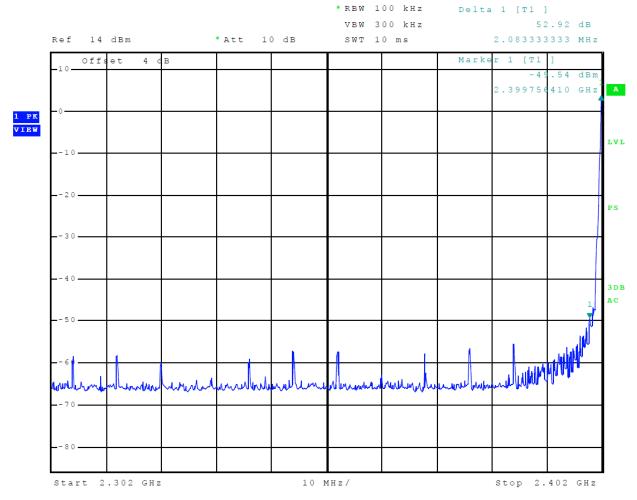


Figure 7 Plot of Transmitter Emissions Low Band Edge Mode 1 ANT (GFSK)

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107 SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107 Page 33 of 46



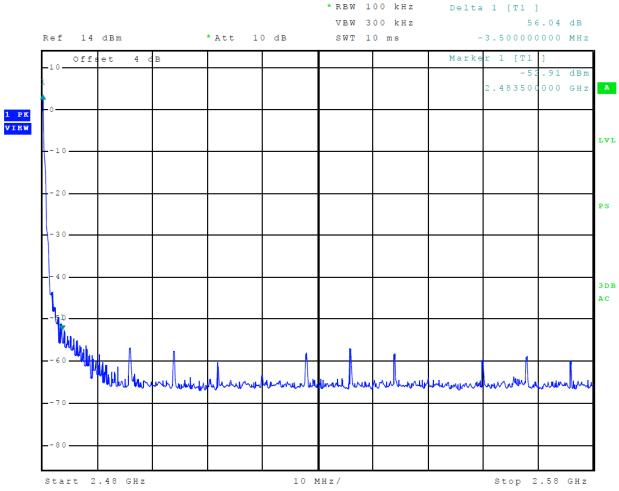


Figure 8 Plot of Transmitter Emissions High Band Edge Mode 1 ANT (GFSK)

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03970 DXX TstRpt 200107 Page 34 of 46



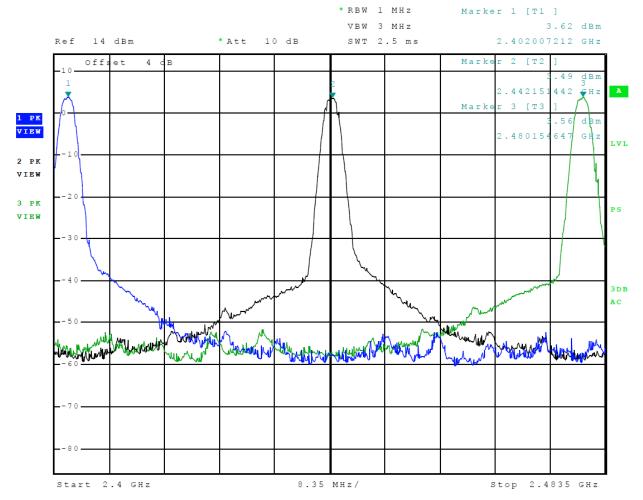


Figure 9 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 2 BLE (GMSK)

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc.

Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970

IC: 1792A-03970

Page 35 of 46



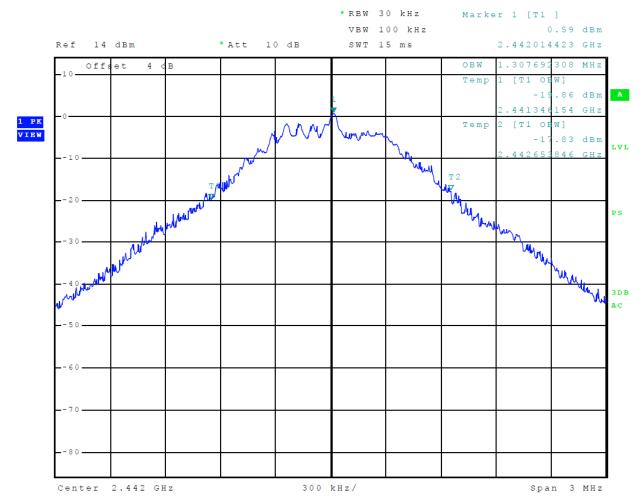


Figure 10 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 2 BLE (GMSK)

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

Revision 1

Garmin International, Inc. Model: A03970

Model: A03970 FCC ID: IPH-03970 Test: 200107 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

SN's: 3319367940, 3319367953

File: A03970 DXX TstRpt 200107 Page 36 of 46



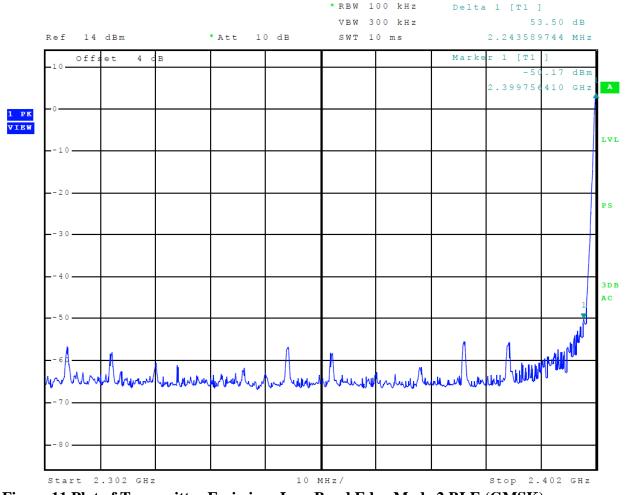


Figure 11 Plot of Transmitter Emissions Low Band Edge Mode 2 BLE (GMSK)

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03970 DXX TstRpt 200107 Page 37 of 46



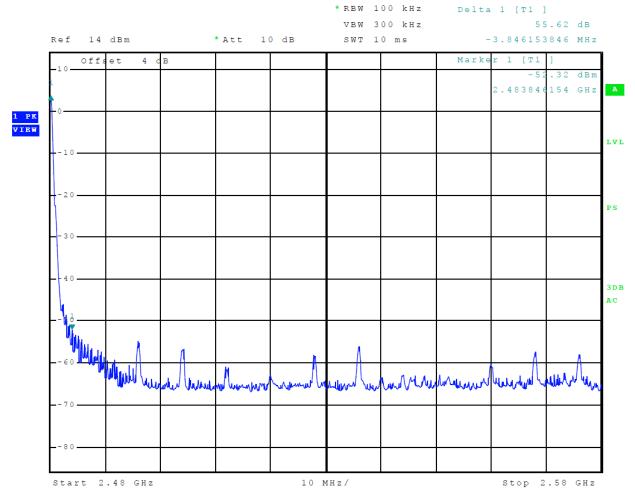


Figure 12 Plot of Transmitter Emissions High Band Edge Mode 2 BLE (GMSK)

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214

Model: A03970 Test: 200107

Garmin International, Inc.

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03970 DXX TstRpt 200107 Page 38 of 46



Transmitter Emissions Data

Table 8 Transmitter Radiated Emissions Mode 1 ANT (GFSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2402.0	98.5	70.8	96.1	68.4	94.0	-23.2	-25.6
4804.0	49.0	36.1	48.8	36.2	54.0	-17.9	-17.8
7206.0	52.6	39.6	53.0	39.6	54.0	-14.4	-14.4
9608.0	54.2	41.7	54.6	41.7	54.0	-12.3	-12.3
12010.0	58.7	45.3	57.6	45.1	54.0	-8.7	-8.9
14412.0	61.7	47.7	61.2	47.7	54.0	-6.3	-6.3
16814.0	63.8	50.6	63.2	50.6	54.0	-3.4	-3.4
2441.0	98.3	70.4	97.1	69.3	94.0	-23.6	-24.7
4882.0	49.1	35.8	48.7	35.8	54.0	-18.2	-18.2
7323.0	52.6	39.9	52.7	39.9	54.0	-14.1	-14.1
9764.0	54.8	41.8	54.5	41.8	54.0	-12.2	-12.2
12205.0	58.8	45.5	58.3	45.5	54.0	-8.5	-8.5
14646.0	60.4	47.7	60.8	47.8	54.0	-6.3	-6.2
17087.0	64.4	50.9	64.3	50.9	54.0	-3.1	-3.1
2480.0	97.4	69.8	98.3	70.6	94.0	-24.2	-23.4
4960.0	48.8	36.1	49.2	36.1	54.0	-17.9	-17.9
7440.0	52.8	39.8	53.2	39.9	54.0	-14.2	-14.1
9920.0	54.2	41.1	54.9	41.3	54.0	-12.9	-12.7
12400.0	57.8	45.3	58.3	45.4	54.0	-8.7	-8.6
14880.0	60.3	47.7	60.2	47.7	54.0	-6.3	-6.3
17360.0	62.8	49.7	62.2	49.7	54.0	-4.3	-4.3

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.

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3319367940, 3319367953

 4405 West 259th Terrace
 Model: A03970
 FCC ID: IPH-03970

 Louisburg, KS 66053
 Test: 200107
 IC: 1792A-03970

Phone/Fax: (913) 837-3214

Test: 200107 IC: 1792A-03970 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 39 of 46



Table 9 Transmitter Radiated Emissions Mode 2 BLE(GMSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2402.0	100.2	93.9	97.6	91.5	94.0	-0.1	-2.5
4804.0	49.2	36.3	49.1	36.3	54.0	-17.7	-17.7
7206.0	52.0	39.7	53.0	40.0	54.0	-14.3	-14.0
9608.0	53.8	41.3	54.3	41.3	54.0	-12.7	-12.7
12010.0	58.4	45.4	59.1	45.4	54.0	-8.6	-8.6
14412.0	60.5	47.8	60.8	47.8	54.0	-6.2	-6.2
16814.0	63.5	50.7	63.9	50.7	54.0	-3.3	-3.3
2442.0	100.4	93.9	98.4	91.8	94.0	-0.1	-2.2
4884.0	48.8	35.9	49.1	36.0	54.0	-18.1	-18.0
7326.0	52.6	40.0	53.3	40.2	54.0	-14.0	-13.8
9768.0	54.6	41.6	55.1	41.7	54.0	-12.4	-12.3
12210.0	58.1	45.6	59.1	45.5	54.0	-8.4	-8.5
14652.0	60.8	47.7	60.3	47.7	54.0	-6.3	-6.3
17094.0	63.9	50.8	63.7	50.9	54.0	-3.2	-3.1
2480.0	99.7	93.6	97.7	91.7	94.0	-0.4	-2.3
4960.0	48.5	36.1	49.2	36.4	54.0	-17.9	-17.6
7440.0	53.2	40.0	52.5	40.0	54.0	-14.0	-14.0
9920.0	54.0	41.2	54.9	41.3	54.0	-12.8	-12.7
12400.0	58.7	45.4	58.0	45.4	54.0	-8.6	-8.6
14880.0	60.5	47.7	60.6	47.7	54.0	-6.3	-6.3
17360.0	62.1	49.8	62.8	49.8	54.0	-4.2	-4.2

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.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214

Model: A03970 Test: 200107 SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 40 of 46

Garmin International, Inc.



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-210 Issue 10 and RSS-GEN Issue 5 Intentional Radiator regulations. The EUT worst-case test sample configuration demonstrated minimum average margin of -0.1 dB below the average emission limit for the fundamental. The EUT worst-case configuration demonstrated minimum radiated harmonic emission margin of -3.1 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. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214 File: A03970 DXX TstRpt 200107

Garmin International, Inc. Model: A03970

Test: 200107 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Page 41 of 46



Annex

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

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Phone/Fax: (913) 837-3214 Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

SN's: 3319367940, 3319367953 FCC ID: IPH-03970 IC: 1792A-03970

Page 42 of 46



Annex A Measurement Uncertainty Calculations

The measurement uncertainty was calculated for all measurements listed in this test report according To CISPR 16-4. Result of measurement uncertainty calculations are recorded below. Component and process variability of production devices similar to those tested may result in additional deviations. The manufacturer has the sole responsibility of continued compliance.

Measurement	Expanded Measurement Uncertainty U _(lab)
3 Meter Horizontal 0.009-1000 MHz Measurements	4.16
3 Meter Vertical 0.009-1000 MHz Measurements	4.33
3 Meter Measurements 1-18 GHz	5.14
3 Meter Measurements 18-40 GHz	5.16
10 Meter Horizontal Measurements 0.009-1000 MHz	4.15
10 Meter Vertical Measurements 0.009-1000 MHz	4.32
AC Line Conducted	1.75
Antenna Port Conducted power	1.17
Frequency Stability	1.00E-11
Temperature	1.6°C
Humidity	3%

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053

Revision 1

Phone/Fax: (913) 837-3214

Garmin International, Inc. Model: A03970

Test: 200107 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03970 DXX TstRpt 200107

FCC ID: IPH-03970 IC: 1792A-03970

SN's: 3319367940, 3319367953

Page 43 of 46



Annex B Additional Test Equipment

List of Test Equipment		Calibration 1	Date (m/d/y)	<u>Due</u>				
☐ Frequency Counter: Leader	LDC-825 (8060153	_	4/18/2019	4/18/2021				
☐ LISN: Com-Power Model L	I-220A		10/14/2019	10/14/2020				
☐ LISN: Com-Power Model L	10/14/2019	10/14/2020						
☐ LISN: Compliance Eng. Mo	4/18/2019	4/18/2020						
☐ LISN: Fischer Custom Com	4/18/2019	4/18/2020						
☐ Cable Huber & Suhne	Huber & Suhner Inc. Sucoflex102ea(1.5M)(303070) 9kHz-40 GHz							
☐ Cable Huber & Suhne	er Inc. Sucoflex102ea(1.5M)(303	3072) 9kHz-40 GH	z 10/14/2019	10/14/2020				
☐ Cable Huber & Suhne	er Inc. Sucoflex102ea(L4M)(281	184) 9kHz-40 GH	z 10/14/2019	10/14/2020				
☐ Cable Huber & Suhne	er Inc. Sucoflex102ea(L10M)(31	17546)9kHz-40 GH	z 10/14/2019	10/14/2020				
☐ Cable Time Microwa	ve 4M-750HF290-750 (4M)	9kHz-24 GH	z 10/14/2019	10/14/2020				
☐ RF Filter Micro-Tronics	BRC17663 (001) 9.3-9.5	notch 30-1800 MH	z 4/18/2019	4/18/2020				
☐ RF Filter Micro-Tronics	BRC19565 (001) 9.2-9.6	notch 30-1800 MH	z 10/16/2018	4/18/2020				
☐ Attenuator Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/18/2019	4/18/2020				
☐ Analyzer HP	8562A (3051A05950)	9kHz-125GHz	4/18/2019	4/18/2020				
☐ Analyzer HP External M	ixers11571, 11970	25GHz-110GH	Iz 4/18/2015	4/18/2025				
☐ Analyzer HP	8591EM (3628A00871)		5/2/2018	5/2/2020				
☐ Antenna: Solar 9229-1 & 92	230-1		2/22/2019	2/22/2020				
☐ R.F. Generator: SMB100A6	s/n 100623		4/18/2019	4/18/2020				
☐ R.F. Generator: SBMBV100	A s/n: 260771		4/18/2019	4/18/2020				
☐ CDN: Com-Power Model C	DN325E		10/14/2019	10/14/2020				
☐ Injection Clamp Luthi Mode	1 EM101		10/14/2019	10/14/2020				
☐ R.F. Power Amp ACS 230-5	60W		10/14/2019	10/14/20200				
☐ R.F. Power Amp EIN Mode	: A301		2/22/2019	2/22/2020				
☐ R.F. Power Amp A.R. Mode	l: 10W 1010M7		2/22/2019	2/22/2020				
☐ Oscilloscope Scope: Tektro	nix MDO 4104		2/22/2019	2/22/2020				
☐ EMC Transient Generator H	VT TR 3000		2/22/2019	2/22/2020				
☐ AC Power Source (Ametech	2/22/2019	2/22/2020						
☐ Field Intensity Meter: EFM-	2/22/2019	2/22/2020						
☐ ESD Simulator: MZ-15	2/22/2019	2/22/2020						
⊠ Shielded Room not required								
Rogers Labs, Inc. 4405 West 259 th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1	Garmin International, Inc. Model: A03970 Test: 200107 Test to: CFR47 15.249, RSS File: A03970 DXX TstRpt 2] S-210, RSS-Gen]	319367940, 3 FCC ID: IPH- C: 1792A-03 Date: January Page 44 of 46	.03970 970 29, 2020				



Annex C Rogers Qualifications

Scot D. Rogers, Engineer

Rogers Labs, Inc.

Mr. Rogers has approximately 32 years' experience in the field of electronics. Work experience includes working in the automated controls industry, 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.

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3319367940, 3319367953

 4405 West 259th Terrace
 Model: A03970
 FCC ID: IPH-03970

 Louisburg, KS 66053
 Test: 200107
 IC: 1792A-03970

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

Revision 1 File: A03970 DXX TstRpt 200107 Page 45 of 46



Annex D Laboratory Certificate of Accreditation

United States Department of Commerce National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200087-0

Rogers Labs, Inc.

Louisburg, KS

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Electromagnetic Compatibility & Telecommunications

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2019-11-07 through 2020-03-31

Effective Dates

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

Revision 1

Garmin International, Inc. Model: A03970 Test: 200107

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

SN's: 3319367940, 3319367953

IC: 1792A-03970

FCC ID: IPH-03970

File: A03970 DXX TstRpt 200107 Page 46 of 46