



ROGERS LABS, INC.

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

Engineering Test Report For Grant of Certification Application

Title 47 CFR, PART 15C - Intentional Radiators Paragraph 15.225 Industry Canada RSS-210 Issue 10, RSS-Gen Issue 5 License Exempt Intentional Radiator

> Model: A04272 FCC ID: IPH-04272 IC: 1792A-04272

NFC Operating in the band 13.110-14.010 MHz (13.56 MHz)

Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

FCC Designation: US5305 ISED Registration: 3041A-1

Test Report Number: 210729

Test Date: July 29, 2021

Authorized Signatory: Sot DRogers

Scot D. Rogers Rogers Labs, Inc.

4405 West 259th Terrace Louisburg, KS 66053

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

Revision 2

Garmin International, Inc. Model: A04272

Test: 210729
Test to: CFR47 15.225, RSS-210

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

File: A04272 NFC TstRpt 210729 r2 Page 1 of 42



Table of Contents

TABLE OF CONTEN	TS	2
REVISIONS		4
EXECUTIVE SUMMA	ARY	5
OPINION / INTERPR	ETATION OF RESULTS	5
EQUIPMENT TESTE	D	6
Equipment Function		7
Equipment Configura	tion	8
APPLICATION FOR	CERTIFICATION	9
APPLICABLE STAN	DARDS	10
EQUIPMENT TESTIN	NG PROCEDURES	10
AC Line Conducted E	mission Test Procedure	10
Radiated Emission Te	st Procedure	10
	gement for Conducted emissions	
	gement for radiated emissions of tabletop equi gement for radiated emissions tested on Open	_
	CONDITIONS	
	ONS	
	EMENTS	
	DDIFICATIONS AND DEVIATIONS	
	ATORS	
Antenna Requirement	S	15
Restricted Bands of O	peration	15
Table 1 Radiated Emi	ssions in Restricted Bands Data	16
Rogers Labs, Inc.	Garmin International, Inc.	SN's: 72W000054 / 72W00008

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

Revision 2

Model: A04272 Test: 210729

Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 Page 2 of 42



Summary of Results for Rad	liated Emissions in Restricted Bands	16
AC Line Conducted EMI Pr	ocedure	17
Figure 1 AC Line Conducted	l emissions of EUT line 1 (Configuration #2, EUT – Computer)	18
Figure 2 AC Line Conducted	l emissions of EUT line 2 (Configuration #2, EUT – Computer)	19
Figure 3 AC Line Conducted	l emissions of EUT line 1 (Configuration #3, EUT – 362-00096-00)	20
Figure 4 AC Line Conducted	d emissions of EUT line 2 (Configuration #3, EUT – 362-00096-00)	2
Figure 5 AC Line Conducted	d emissions of EUT line 1 (Configuration #4, EUT – 362-00112-00)	22
Figure 6 AC Line Conducted	l emissions of EUT line 2 (Configuration #4, EUT – 362-00112-00)	2
Table 2 AC Line Conducted	Emissions Data L1 (Configuration #2, EUT – Computer)	24
Table 3 AC Line Conducted	Emissions Data L2 (Configuration #2, EUT – Computer)	24
Table 4 AC Line Conducted	Emissions Data L1 (Configuration #3, 362-00096-00)	2
Table 5 AC Line Conducted	Emissions Data L2 (Configuration #3, 362-00096-00)	2
Table 6 AC Line Conducted	Emissions Data L1 (Configuration #4, 362-00112-00)	2
Table 7 AC Line Conducted	Emissions Data L2 (Configuration #4, 362-00112-00)	2
Summary of Results for AC	Line Conducted Emissions Results	2
General Radiated Emissions	Procedure	2
Table 8 General Radiated En	nissions from EUT Data (Highest Emissions)	2
Summary of Results for Gen	eral Radiated Emissions	2
Operation in the Band 13.11	0 - 14.010 MHz Band	2
Figure 7 Plot of NFC Operat	ion Across Frequency Spectrum	3
Figure 8 Plot of NFC Operat	ion in Authorized Frequency Band	3
Figure 9 Plot of NFC 99 per	cent Occupied Bandwidth	3
Table 8 NFC Transmitter En	nissions in Frequency Band 13.110-14.010 MHz	3
Table 9 Transmitter Harmon	ic Radiated Emissions Data	3
Summary of Results for Tra	nsmitter Radiated Emissions of Intentional Radiator	3
Frequency Stability		3
Measurements Required		3
Test Arrangement		3
Table 10 Frequency Stability	vs. Temperature Results	3
Table 11 Frequency Stability	vs. Input Power Supply Voltage Results	30
NEX		37
gers Labs, Inc.	Garmin International, Inc. SN's: 72W000054 / 7	

Garmin International, Inc.
Model: A04272
Test: 210729
Test to: CFR47 15.225, RSS-210

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

File: A04272 NFC TstRpt 210729 r2 Page 3 of 42



Annex A Measurement Uncertainty Calculations	38
Annex B Test Equipment	39
Annex C Rogers Qualifications	41
Annex D Laboratory Certificate of Accreditation	42

Revisions

Revision 2 Issued September 29, 2021 – updated USB cable Revision 1 Issued September 27, 2021

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

Garmin International, Inc. Model: A04272 Test: 210729

FCC ID: IPH-04272 IC: 1792A-04272 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 4 of 42

SN's: 72W000054 / 72W000083



Executive Summary

The following information is submitted for consideration in obtaining Grant of Certification for low power intentional radiator per Title 47 Code of Federal Regulations (47CFR) dated July 29, 2021, Paragraph 15.225, and Innovation, Science and Economic Development (ISED) RSS-210 Issue 10 operation at 13.56 MHz as Near Field Communications Device.

Name of Applicant: Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

Model: A04272

FCC ID: IPH-04272 IC: 1792A-04272

Frequency Range: 13.56 MHz

Operating power: maximum peak power 70.3 dBµV/m @ 3 meters, 99 percent occupied

bandwidth 17.95 kHz

Operational communication mode

Mode	Peak Power (dBµV/m@3m)	Average power (dBµV/m@3m)	99% OBW (kHz)
Mode 0 NFC	70.3	61.3	17.95

This report addresses EUT Operations as Low Power Device using NFC 13.56 MHz transmission

Opinion / Interpretation of Results

Revision 2

Tests Performed	Margin (dB)	Results
Emissions as per 47CFR 15.205, RS-210 2.2	-26.3	Complies
Emissions as per 47CFR 15.207, RSS-GEN 8.8	-4.3	Complies
Emissions as per 47CFR 15.209, RSS-GEN 8.9	-9.2	Complies
Fundamental Emission per 47CFR 15.225, RSS-210 B.6	-53.7	Complies

Rogers Labs, Inc. Garmin International, Inc. SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

File: A04272 NFC TstRpt 210729 r2

Page 5 of 42



Equipment Tested

Model: A04272

<u>Equipment</u>	Model / PN	Serial Number
EUT	A04272	72W000054
EUT2	A04272	72W000083
EUT3	A04272	72W000092
USB	320-01381-00	N/A
AC Adapter	362-00096-00	N/A
AC Adapter	362-00112-00	N/A
Laptop Computer	Latitude E6520	6CB35Q1
USB Printer	Dell 0N5819	5D1SL61

Test results in this report relate only to the items tested and operation in mode 0 (NFC)

Operational communication modes

Mode	Transmitter Operation
0	Near Field Communications (NFC)
1	ANT (GFSK)
2	BT BLE (GMSK)

Software Versions 3.08, BLE 1.00

2.4 GHz antenna system, Internal Planar Inverted F (-7.0 dBi); NFC – Planar coil/inductor

Test results in this report relate only to the items tested. Worst-case configuration data recorded in this report.

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

Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

Page 6 of 42



Equipment Function

The EUT is a portable body worn digital device. The device displays time, incorporates sensors to log movement and other parameters, receiver circuitry to receive Global Navigation Satellite System (GNSS) data, and includes transmitter functions for communication with compatible equipment. The design provides a single unique connection point for use with the unique USB interface Clip and offers no other interface options as presented below in the configuration diagrams. The transmitters provide operation capability as Near Field Communications (NFC) operating at 13.56 MHz. The design also incorporates transmitter functions across the 2402-2480 MHz frequency band. The design provides wireless communications with compatible NFC, ANT, and Bluetooth® (BT) equipment. The product operates from internal rechargeable battery only and requires battery recharge through the provided USB interface Clip and compatible USB power source. The design utilizes internal fixed antenna systems and offers no provision for antenna replacement or modification. Three samples were provided for testing, one representative of production design, EUT2 modified for testing purposes replacing the integral 2.4 GHz antenna with RF connection port and EUT3 modified by replacing the GPS antenna with a RF connector for GNSS testing. The test samples were provided with software (Version 3.08) 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 operate at lower duty cycle to conserve battery life. The antenna modifications offered testing facility the ability to connect test equipment to the temporary 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 and required by regulations, the equipment was tested for compliance using the available configurations with the worst-case data presented. This report documents the testing performed 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 2

Garmin International, Inc. Model: A04272 Test: 210729

FCC ID: IPH-04272 IC: 1792A-04272 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 7 of 42

SN's: 72W000054 / 72W000083



Equipment Configuration

1) Unit operating off internal battery

Unit under Test

2) Unit connected to Computer USB port through USB assembly (GPN: 320-01381-00)

Unit under Test USB Computer USB port 320-01381-00

3) Unit connected to USB (GPN: 320-01381-00) and AC Adapter 362-00096-00

Unit under Test AC Adapter USB 362-00096-00 320-01381-00

4) Unit connected to USB (GPN: 320-01381-00) and AC Adapter 362-00112-00

AC Adapter Unit under Test USB 362-00112-00 320-01381-00

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

Revision 2

File: A04272 NFC TstRpt 210729 r2

Model: A04272 Test: 210729 Test to: CFR47 15.225, RSS-210

Garmin International, Inc.

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 Page 8 of 42



Application for Certification

(1) Manufacturer: Garmin International, Inc.

1200 East 151st Street

Olathe, KS 66062

(2) Identification: Model: A04272

FCC ID: IPH-04272 IC: 1792A-04272

(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 unique USB clip and compatible equipment as presented in this filing. The EUT offers no other connection ports than those presented in this filing.
- (9) Transition Provisions of 47CFR 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: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 9 of 42



Applicable Standards

In accordance with the Federal Communications 47CFR dated July 29, 2021: 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 15C Paragraph 15.225, Industry Canada RSS-210 Issue 10, and RSS-GEN issue 5, the following information is submitted. Test procedures used are the established Methods of Measurement of Radio-Noise Emissions as described in the ANSI C63.10-2013 Document.

Equipment Testing Procedures

AC Line Conducted Emission Test Procedure

Testing for the AC line-conducted emissions was performed as required in 47CFR 15C, RSS-210 Issue 10 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 1.5meter 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 47CFR 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 15.225, RSS-210

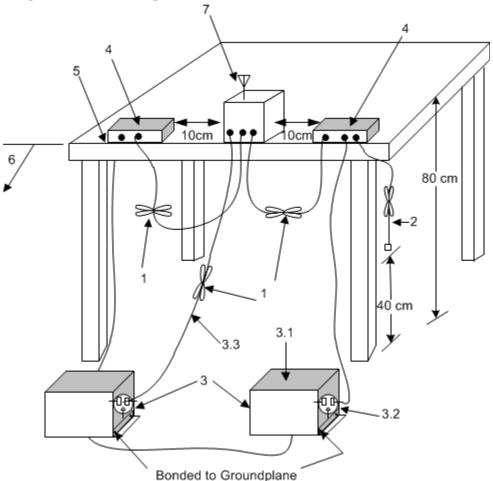
Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 10 of 42



Diagram 1 Test arrangement for Conducted emissions



- 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.

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

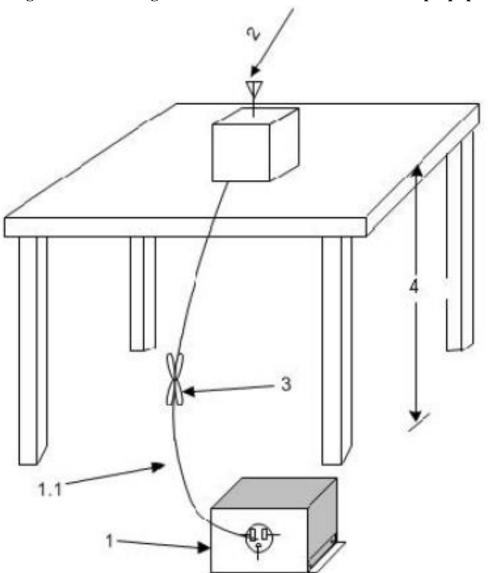
 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

 Revision 2
 File: A04272 NFC TstRpt 210729 r2
 Page 11 of 42



Diagram 2 Test arrangement for radiated emissions of tabletop equipment



- 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).

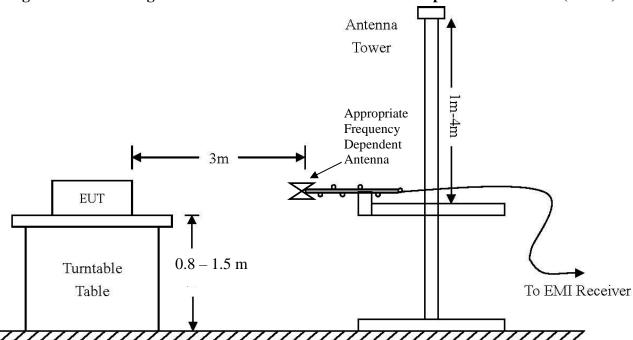
Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 12 of 42



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



Environmental Conditions

Ambient Temperature 23.6° C

Relative Humidity 45%

Atmospheric Pressure 1016.6 mb

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021 Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 13 of 42



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

Units of Measurements

Conducted EMI Data presented in dBuV; 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 $(dB\mu V/m @ 3m) = FSM (dB\mu V) + A.F. (dB/m) + Losses (dB) - Gain (dB)$

Rogers Labs, Inc. Garmin International, Inc. SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 14 of 42



Statement of Modifications and Deviations

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

Intentional Radiators

The following information is submitted supporting demonstration of compliance with the requirements of 47CFR, Subpart C, paragraph 15.225 and RSS-210 Issue 10 the following information is submitted.

Antenna Requirements

The EUT incorporates integral antenna system and offers no provision for connection to alternate 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.

Restricted Bands of Operation

Spurious emissions falling in the restricted frequency bands of operation were measured at the OATS. The EUT utilizes frequency, determining circuitry, which generates harmonics falling in the restricted bands. Emissions were investigated at the OATS, using appropriate antennas or pyramidal horns, amplification stages, and a spectrum analyzer. Peak and average amplitudes of frequencies above 1000 MHz were compared to the required limits with worst-case data presented below. Test procedures of ANSI C63.10-2013 paragraph 6 were used during testing. No other significant emission was observed which fell into the restricted bands of operation. Computed emission values consider the received radiated field strength, receive antenna correction factor, amplifier gain stage, and test system cable losses.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210

Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 15 of 42

SN's: 72W000054 / 72W000083



Table 1 Radiated Emissions in Restricted Bands Data

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)
108.4	26.3	13.3	30.6	15.3	43.5	-30.2	-28.2
122.0	28.3	17.3	26.5	17.2	43.5	-26.2	-26.3

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.

Summary of Results for Radiated Emissions in Restricted Bands

The EUT demonstrated compliance with the radiated emissions requirements of CFR Title 47 Part 15C and RSS-210 Issue 10 Intentional Radiators. The EUT demonstrated a worst-case minimum margin of -26.3 dB below the radiated emissions requirements in restricted frequency bands. Peak, Quasi-peak, and average amplitudes were checked for compliance with the regulations. Worst-case emissions are reported with other emissions found in the restricted frequency bands at least 20 dB below the requirements.

Rogers Labs, Inc.
Garmin International, Inc.
SN's: 72W000054 / 72W000083
4405 West 259th Terrace
Model: A04272
FCC ID: IPH-04272

Louisburg, KS 66053 Test: 210729 IC: 1792A-04272
Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021
Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 16 of 42



AC Line Conducted EMI Procedure

The EUT was arranged in typical equipment configurations operating from AC power adapter. Testing was performed with the EUT placed on a 1 x 1.5-meter wooden 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 were the procedures of ANSI C63.10-2013 paragraph 6. The AC adapter for the EUT was connected to the LISN for lineconducted emissions testing. A second LISN was positioned on the floor of the screen room 80cm from the rear of the supporting equipment of the EUT. 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 maximum conducted emissions levels.

Refer to figures one and two for plots of the EUT – USB Computer interface configuration #2 AC Line conducted emissions.

Refer to figures three and four showing plots of the AC Adapter configuration #3 (362-00096-00) AC Line conducted emissions.

Refer to figures five and six showing plots of the AC Adapter configuration #4 (362-00112-00) AC Line conducted emissions.

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

Revision 2

Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

Garmin International, Inc.

Model: A04272

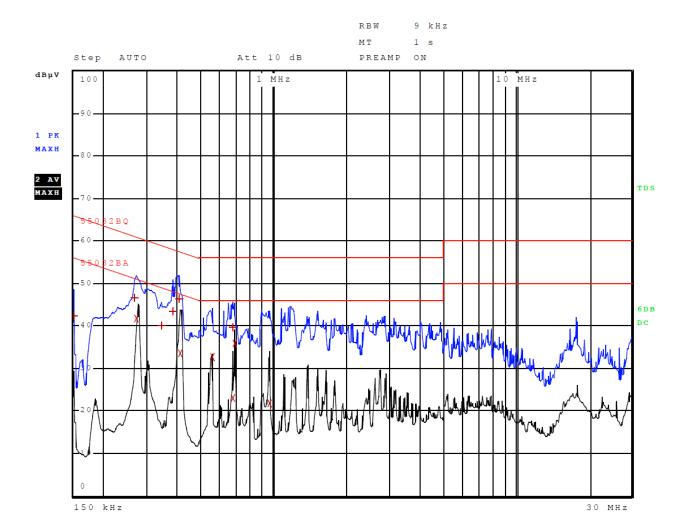
IC: 1792A-04272 Date: September 29, 2021 Page 17 of 42

SN's: 72W000054 / 72W000083

FCC ID: IPH-04272



Figure 1 AC Line Conducted emissions of EUT line 1 (Configuration #2, EUT – Computer)



Revision 2

Garmin International, Inc. Model: A04272

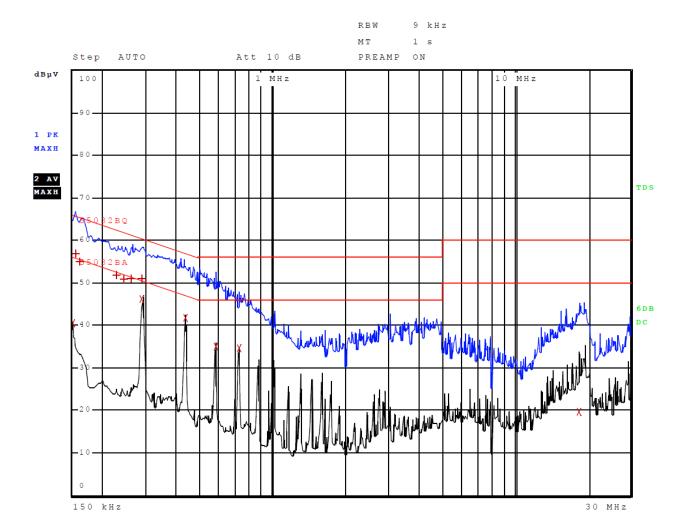
Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 Page 18 of 42



Figure 2 AC Line Conducted emissions of EUT line 2 (Configuration #2, EUT – Computer)



Revision 2

Garmin International, Inc. Model: A04272

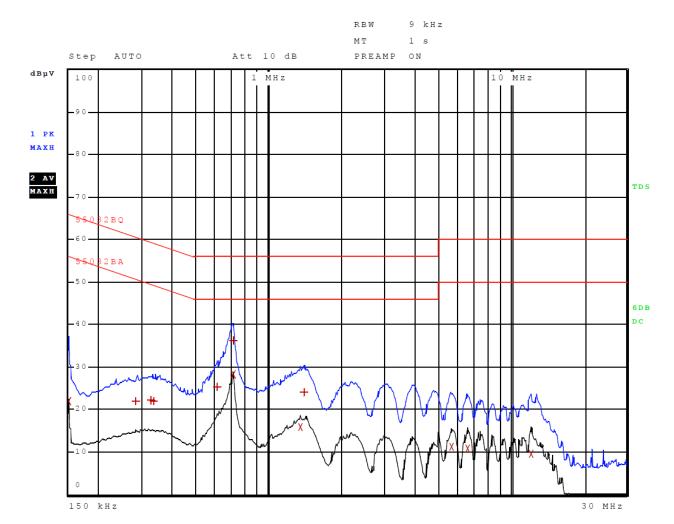
Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 2 Page 19 of 42



Figure 3 AC Line Conducted emissions of EUT line 1 (Configuration #3, EUT – 362-00096-00)



Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

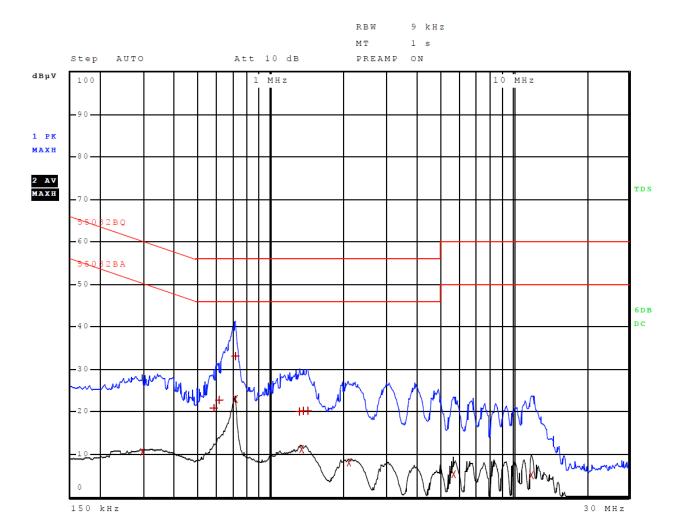
Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021
Page 20 of 42



Figure 4 AC Line Conducted emissions of EUT line 2 (Configuration #3, EUT – 362-00096-00)



Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

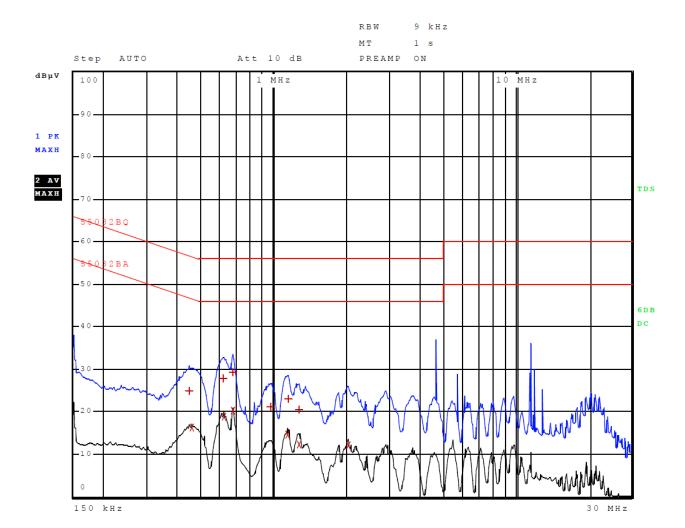
Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 2 Page 21 of 42



Figure 5 AC Line Conducted emissions of EUT line 1 (Configuration #4, EUT – 362-00112-00)



Revision 2

Garmin International, Inc.

Model: A04272 Test: 210729

Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

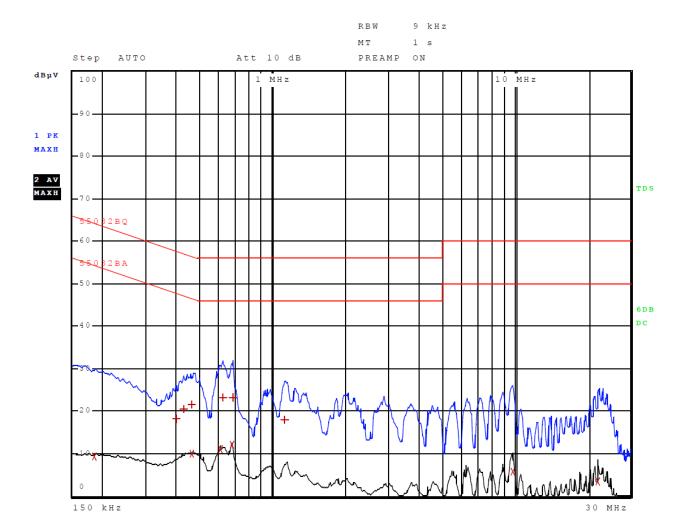
SN's: 72W000054 / 72W000083 FCC ID: IPH-04272

IC: 1792A-04272 Date: September 29, 2021

Page 22 of 42



Figure 6 AC Line Conducted emissions of EUT line 2 (Configuration #4, EUT – 362-00112-00)



Revision 2

Model: A04272 Test: 210729 Test to: CFR47 15.225, RSS-210

Garmin International, Inc.

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 23 of 42

SN's: 72W000054 / 72W000083



Table 2 AC Line Conducted Emissions Data L1 (Configuration #2, EUT – Computer)

Trace	Frequenc	у	Level (dBµV)	Detector	Delta Limit/dB
1	150.000000000	kHz	42.37	Quasi Peak	-23.63
1	270.000000000	kHz	46.50	Quasi Peak	-14.61
2	274.000000000	kHz	41.64	Average	-9.36
1	342.000000000	kHz	40.08	Quasi Peak	-19.07
1	382.000000000	kHz	43.38	Quasi Peak	-14.85
1	406.000000000	kHz	46.39	Quasi Peak	-11.34
2	410.000000000	kHz	33.42	Average	-14.23
2	554.000000000	kHz	32.59	Average	- 13.41
2	678.000000000	kHz	22.96	Average	-23.04
1	678.000000000	kHz	39.62	Quasi Peak	-16.38
2	690.000000000	kHz	35.76	Average	-10.24
2	958.000000000	kHz	21.70	Average	-24.30

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

Table 3 AC Line Conducted Emissions Data L2 (Configuration #2, EUT – Computer)

Trace	Frequenc	у	Level (dBµV)	Detector	Delta Limit/dB
2	150.000000000	kHz	40.39	Average	-15.61
1	154.000000000	kHz	56.93	Quasi Peak	-8.85
1	162.000000000	kHz	54.87	Quasi Peak	-10.49
1	230.000000000	kHz	51.76	Quasi Peak	-10.69
1	246.000000000	kHz	50.82	Quasi Peak	-11.07
1	262.000000000	kHz	51.03	Quasi Peak	-10.34
2	290.000000000	kHz	46.14	Average	-4.38
1	290.000000000	kHz	50.87	Quasi Peak	-9.66
2	434.000000000	kHz	41.70	Average	-5.47
2	578.000000000	kHz	34.92	Average	-11.08
2	726.000000000	kHz	34.52	Average	-11.48
2	18.347900000	MHz	19.68	Average	- 30.32

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 2

Garmin International, Inc.
Model: A04272

Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 Page 24 of 42



Table 4 AC Line Conducted Emissions Data L1 (Configuration #3, 362-00096-00)

Trace	Frequenc	у	Level (dBµV) Detector	Delta Limit/dB
2	150.000000000	kHz	21.91	Average	-34.09
1	286.000000000	kHz	21.88	Quasi Peak	- 38.76
1	330.000000000	kHz	22.14	Quasi Peak	- 37.31
1	338.000000000	kHz	22.04	Quasi Peak	- 37.22
1	610.000000000	kHz	25.23	Quasi Peak	-30.77
1	710.000000000	kHz	36.25	Quasi Peak	-19.75
2	714.000000000	kHz	28.26	Average	-17.74
2	1.346000000	MHz	15.81	Average	-30.19
1	1.394000000	MHz	24.01	Quasi Peak	- 31.99
2	5.679900000	MHz	11.19	Average	- 38.81
2	6.639900000	MHz	10.76	Average	- 39.24
2	12.055900000	MHz	9.61	Average	-40.39

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

Table 5 AC Line Conducted Emissions Data L2 (Configuration #3, 362-00096-00)

Trace	Frequenc	y	Level (dBµV)	Detector	Delta Limit/dB
2	298.000000000	kHz	10.71	Average	- 39.59
1	582.000000000	kHz	20.95	Quasi Peak	- 35.05
1	610.000000000	kHz	22.79	Quasi Peak	- 33.21
2	710.000000000	kHz	23.05	Average	- 22.95
1	710.000000000	kHz	33.07	Quasi Peak	- 22.93
1	1.318000000	MHz	19.99	Quasi Peak	- 36.01
2	1.342000000	MHz	11.16	Average	-34.84
1	1.358000000	MHz	20.34	Quasi Peak	- 35.66
1	1.414000000	MHz	20.17	Quasi Peak	- 35.83
2	2.106000000	MHz	8.13	Average	- 37.87
2	5.679900000	MHz	5.30	Average	- 44.70
2	11.883900000	MHz	5.14	Average	-44.86

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 2

Garmin International, Inc.
Model: A04272

Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 Page 25 of 42



Table 6 AC Line Conducted Emissions Data L1 (Configuration #4, 362-00112-00)

Trace	Frequenc	у	Level (dBµV)	Detector	Delta Limit/dB
1	446.000000000	kHz	24.91	Quasi Peak	-32.04
2	458.000000000	kHz	16.32	Average	-30.41
1	614.000000000	kHz	27.75	Quasi Peak	- 28.25
2	618.000000000	kHz	18.81	Average	- 27.19
2	674.000000000	kHz	20.36	Average	-25.64
1	678.000000000	kHz	29.27	Quasi Peak	- 26.73
1	970.000000000	kHz	21.15	Quasi Peak	-34.85
2	1.134000000	MHz	14.66	Average	-31.34
1	1.146000000	MHz	23.00	Quasi Peak	-33.00
1	1.266000000	MHz	20.59	Quasi Peak	- 35.41
2	1.270000000	MHz	12.22	Average	- 33.78
2	2.030000000	MHz	12.15	Average	- 33.85

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

Table 7 AC Line Conducted Emissions Data L2 (Configuration #4, 362-00112-00)

Trace	Frequenc	y	Level (dBµV)	Detector	Delta Limit/dB
2	186.000000000	kHz	9.27	Average	-44.95
1	398.000000000	kHz	18.25	Quasi Peak	- 39.65
1	426.000000000	kHz	20.39	Quasi Peak	-36.94
2	466.000000000	kHz	10.06	Average	- 36.52
1	466.000000000	kHz	21.61	Quasi Peak	- 34.98
2	606.000000000	kHz	10.93	Average	-35.07
1	618.000000000	kHz	23.29	Quasi Peak	- 32.71
2	674.000000000	kHz	12.01	Average	-33.99
1	682.000000000	kHz	23.23	Quasi Peak	- 32.77
1	1.118000000	MHz	17.87	Quasi Peak	- 38.13
2	9.735900000	MHz	5.71	Average	-44.29
2	21.983900000	MHz	3.51	Average	-46.49

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 2

Garmin International, Inc.
Model: A04272

Test: 210729 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 2 Page 26 of 42



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-CPU configurations #2 worst-case configuration demonstrated a minimum margin of -4.3 dB below the requirement. The EUT-AC adapter configuration #3 worst-case configuration demonstrated a minimum margin of -17.7 dB below the requirement. The EUT-AC adapter configuration #4 worst-case configuration demonstrated a minimum margin of -25.6 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 at 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 2

Garmin International, Inc. Model: A04272 Test: 210729 Test to: CFR47 15.225, RSS-210

File: A04272 NFC TstRpt 210729 r2

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 Page 27 of 42

SN's: 72W000054 / 72W000083



Table 8 General Radiated Emissions from EUT Data (Highest Emissions)

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)
40.7	26.3	12.7	38.6	25.0	40.0	-27.3	-15.0
50.4	29.9	23.2	34.9	30.8	40.0	-16.8	-9.2
63.5	31.5	28.7	35.0	30.2	40.0	-11.3	-9.8
67.8	23.4	9.0	25.9	11.9	40.0	-31.0	-28.1
72.9	29.7	21.8	32.3	28.8	40.0	-18.2	-11.2
81.3	25.7	12.6	27.7	15.7	40.0	-27.4	-24.3

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.

Summary of Results for General Radiated Emissions

The EUT demonstrated compliance with the radiated emissions requirements of 47CFR Part 15C paragraph 15.209, RSS-210 Issue 10 and RSS-GEN Intentional Radiators. The EUT demonstrated a minimum margin of -9.2 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 2

Test: 210729
Test to: CFR47 15.225, RSS-210

Garmin International, Inc.

Model: A04272

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

SN's: 72W000054 / 72W000083

File: A04272 NFC TstRpt 210729 r2 Page 28 of 42



Operation in the Band 13.110 - 14.010 MHz Band

The transmitter output power; harmonic and general emissions were measured on an open area test site at 3 and 10 meters. Test procedures of ANSI C63.10-2013 were used during testing. The EUT was placed on a turntable elevated as required above the ground plane and at a distance of 3 and 10 meters from the FSM antenna. The peak and quasi-peak amplitude of frequencies below 1000 MHz were measured using a spectrum analyzer. Plots were taken of transmitter performance for reference in this and other documentation. The amplitude of each radiated emission was measured on the OATS at a distance of 3 and/or 10 meters from the FSM antenna (OATS testing was performed on sample 1 representative of production equipment with integral antenna). The measured amplitude was then corrected for comparison with the limits. Measurements taken at 3 meters of the fundamental and emissions below 30 MHz were corrected using the square of an inverse linear distance extrapolation factor (40 dB/decade) as provided in the standards and requirements. The amplitude of each radiated emission was maximized 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 dBµV/m @ 3 meters. Testing performed demonstrated compliance with the following requirements (per 47CFR 15.225). Refer to figure five through nine showing the operation in the frequency band.

- (a) The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15,848 microvolts/meter at 30 meters (84 dBµV/M @ 30m).
- (b) Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters (50.5 dBµV/M @ 30m).
- (c) Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters (40.5 dBµV/M @ 30m).
- (d) The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.
- (e) The frequency tolerance of the carrier signal shall be maintained within $\pm 0.01\%$ of the operating frequency over a temperature variation of -20 degrees to +50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery-operated equipment, the equipment tests shall be performed using a new battery.
- (f) In the case of radio frequency powered tags designed to operate with a device authorized under this section, the tag may be approved with the device or be considered as a separate device subject to its own authorization. Powered tags approved with a device under a single application shall be labeled with the same identification number as the device.

Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210

Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

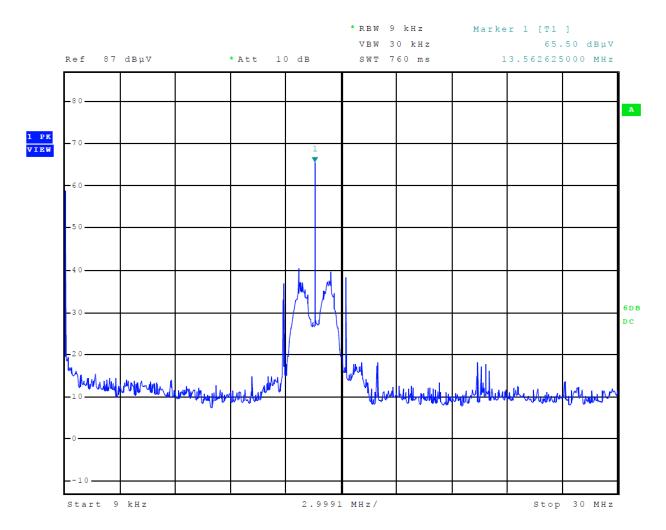
FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

SN's: 72W000054 / 72W000083

File: A04272 NFC TstRpt 210729 r2 Page 29 of 42



Figure 7 Plot of NFC Operation Across Frequency Spectrum



Rogers Labs, Inc. 4405 West 259th Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210

Revision 2

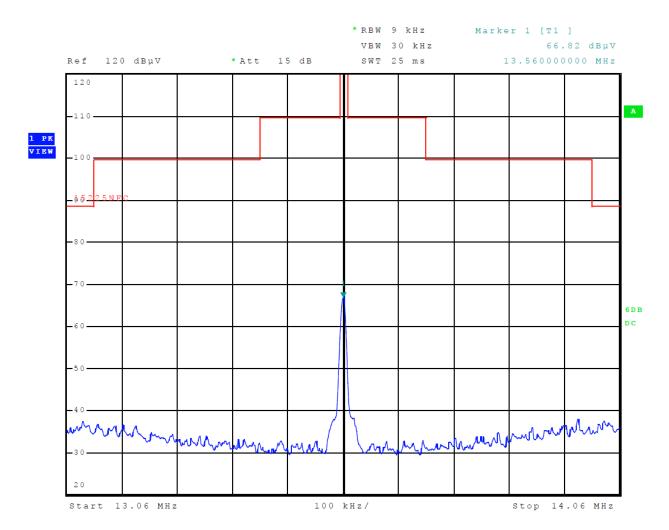
Garmin International, Inc. Model: A04272 Test: 210729

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 File: A04272 NFC TstRpt 210729 r2 Page 30 of 42

SN's: 72W000054 / 72W000083



Figure 8 Plot of NFC Operation in Authorized Frequency Band



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

Revision 2

Garmin International, Inc. Model: A04272

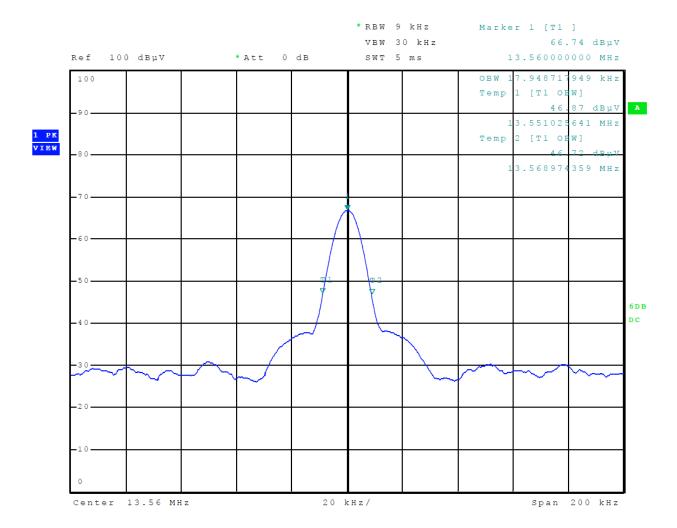
Test: 210729
Test to: CFR47 15.225, RSS-210

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

File: A04272 NFC TstRpt 210729 r2 Page 31 of 42



Figure 9 Plot of NFC 99 percent Occupied Bandwidth



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

Revision 2

Garmin International, Inc. Model: A04272

Test: 210729 Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272

Date: September 29, 2021 Page 32 of 42



Table 8 NFC Transmitter Emissions in Frequency Band 13.110-14.010 MHz

Frequency in MHz	Peak Level (dBµV/m)	Quasi-Peak Level (dBµV/m)	Limit (dBµV/m) @ 3m	Margin (dB)
13.560	70.3	61.3	124.0	-53.7

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

NOTES:

- 1. Fundamental radiated emission measurements were performed using a loop antenna. The test sample was positioned in three orthogonal positions (X front, Y side, Z top) and the position with the highest emission level was recorded.
- 2. The EUT was positioned in three orthogonal planes to determine the orientation resulting in the worst-case emissions. The worst-case emission was found when the front of the EUT was facing the receive antenna.
- 3. Measurements were performed at 3m and the limit was extrapolated to the measurement distance of 3 m using the square of an inverse linear distance extrapolation factor (40 dB/decade) as specified in \$15.31(f)(2). Extrapolation Factor = $20 \log 10 (30/3)^2 = 40 dB$
- 4. All measurements were recorded using a spectrum analyzer employing peak and quasi-peak detectors.
- 5. Field Strength Level $[dB\mu V/m] = Level read from Analyzer <math>[dB\mu V] + AFCL [dB/m] Amplifier Gain (dB)$
- 6. AFCL [dB/m] = Antenna Factor [dB/m] + Cable Loss [dB]
- 7. Margin [dB] = Field Strength Level [dB μ V/m] Limit [dB μ V/m]

Table 9 Transmitter Harmonic Radiated Emissions Data

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)
40.7	26.3	12.7	38.6	25.0	40.0	-27.3	-15.0
54.2	24.7	11.8	33.6	22.6	40.0	-28.2	-17.4
67.8	23.4	9.0	25.9	11.9	40.0	-31.0	-28.1
81.3	25.7	12.6	27.7	15.7	40.0	-27.4	-24.3

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: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 33 of 42



Summary of Results for Transmitter Radiated Emissions of Intentional Radiator

The EUT demonstrated compliance with the radiated emissions requirements of FCC 47 CFR Part 15.225, Industry Canada RSS-GEN issue 5, RSS-210 Issue 10 Intentional Radiator regulations. The EUT worst-case configuration demonstrated minimum margin of -53.7 dB below the limit for the fundamental. The EUT worst-case configuration demonstrated minimum radiated harmonic emission margin of -15.0 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.

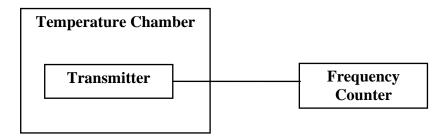
Frequency Stability

Measurements Required

The frequency stability shall be measured with variations of ambient temperature from -30° to +50° centigrade. Measurements shall be made at the extremes of the temperature range and at intervals of not more than 10° centigrade through the range. A period sufficient to stabilize all of the components of the oscillator circuit at each temperature level shall be allowed prior to frequency measurement. In addition to temperature stability, the frequency stability shall be measured with variation of primary supply voltage as follows:

- (1) Vary primary supply voltage from 85 to 115 percent of the nominal value.
- (2) The supply voltage shall be measured at the input to the cable normally provided with the equipment, or at the power supply terminals if cables are not normally provided.

Test Arrangement



The measurement procedure outlined below shall be followed during measurement of frequency variation over temperature.

Rogers Labs, Inc. Garmin International, Inc. SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 34 of 42



<u>Step 1:</u> The transmitter shall be installed in an environmental test chamber whose temperature is controllable. Provision shall be made to measure the frequency of the transmitter.

<u>Step 2:</u> With the transmitter inoperative (power switched "OFF"), the temperature of the test chamber shall be adjusted to +25°C. After a temperature stabilization period of one hour at +25°C, the transmitter shall be switched "ON" with standard test voltage applied.

<u>Step 3:</u> The carrier shall be keyed "ON", and the transmitter shall be operated at full radio frequency power output at the duty cycle, for which it is rated, for duration of at least 5 minutes. The radio frequency carrier frequency shall be monitored, and measurements shall be recorded.

<u>Step 4:</u> The test procedures outlined in Steps 2 and 3, shall be repeated after stabilizing the transmitter at the environmental temperatures specified, -30°C to +50°C in 10-degree increments.

The frequency stability was measured with variations in the power supply voltage from 85 to 115 percent of the nominal value. An AC Power Supply was used during measurement of frequency variation over input power to the AC power adapter. The frequency was measured and the variation in parts per million calculated. Data was taken per 47CFR Paragraphs 2.1055 and applicable paragraphs of part 15.225 and RSS-210 Issue 10.

Table 10 Frequency Stability vs. Temperature Results

Frequency 13.559888 MHz		Frequency Stability Vs. Temperature Ambient Frequency (13.559888 MHz)							
Temperature °C	-30	-20	-10	0	+10	+20	+30	+40	+50
Change (Hz)	58	58	66	7	-1	0	0	-11	-20
%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Limit (%)	±0.01	±0.01	±0.01	±0.01	±0.01	±0.01	±0.01	±0.01	±0.01

Rogers Labs, Inc. Garmin International, Inc. SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

 Phone/Fax: (913) 837-3214
 Test to: CFR47 15.225, RSS-210
 Date: September 29, 2021

Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 35 of 42



Table 11 Frequency Stability vs. Input Power Supply Voltage Results

Channel Frequency 13.559888 MHz	•	cy Stability Vs. Voltage volts nominal; Results In	
Voltage V _{dc}	102.0	120.0	138.0
Change (Hz)	0	0	0
%	0.000	0.000	0.000
Limit (%)	±0.01	±0.01	±0.01

The EUT demonstrated compliance with specifications of 47CFR Paragraph 2.1046(a) and applicable Parts of 15.225 and RSS-210 Issue 10. There are no deviations or exceptions to the specifications.

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

Revision 2

Model: A04272 Test: 210729 Test to: CFR47 15.225, RSS-210 Date: 5 File: A04272 NFC TstRpt 210729 r2

Garmin International, Inc.

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

Page 36 of 42

SN's: 72W000054 / 72W000083



Annex

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

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

Revision 2

Garmin International, Inc. Model: A04272 Test: 210729

FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2 Page 37 of 42

SN's: 72W000054 / 72W000083



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 2

Test: 210729 Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210 File: A04272 NFC TstRpt 210729 r2

Model: A04272

Garmin International, Inc.

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272 IC: 1792A-04272 Date: September 29, 2021

Page 38 of 42



Annex B Test Equipment

<u>Equipment</u>	Manufacturer	Model (SN)	Band Ca	al Date(m/d/y) Due
□ LISN		ISN-50-25-10(1PA) (160611)		4/6/2021	4/6/2022
⊠ LISN		FCC-LISN-2.Mod.cd,(126)		10/14/2020	10/14/2021
□ Cable		c. Sucoflex102ea(L10M)(3030)			10/14/2021
□ Cable		c. Sucoflex102ea(1.5M)(30306	*	10/14/2020	10/14/2021
⊠ Cable		c. Sucoflex102ea(1.5M)(30307	•	10/14/2020	10/14/2021
⊠ Cable	Belden	RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/14/2020	10/14/2021
⊠ Cable	Belden	RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/14/2020	10/14/2021
	Com Power	AL-130 (121055)	.001-30 MHz	10/14/2020	10/14/2021
☐ Antenna:	EMCO	6509	.001-30 MHz	10/14/2020	10/14/2022
☐ Antenna	ARA	BCD-235-B (169)	20-350MHz	10/14/2020	10/14/2021
☐ Antenna:		el VHBB 9124 (1468)	20 00 01/1112	10/14/2020	10/14/2022
	Sunol	JB-6 (A100709)	30-1000 MHz	10/14/2020	10/14/2021
□ Antenna	ETS-Lindgren	3147 (40582)	200-1000MHz	10/14/2020	10/14/2022
☐ Antenna:	~	el: VULP 9118 A (VULP 9118		10/14/2020	10/14/2022
	ETS-Lindgren	3117 (200389)	1-18 GHz	4/21/2020	4/21/2022
□ Antenna	Com Power	AH-118 (10110)	1-18 GHz	10/14/2020	10/14/2022
	Com Power	AH-840 (101046)	18-40 GHz	4/6/2021	4/6/2023
⊠ Analyzer	Rohde & Schwarz	ESU40 (100108)	20Hz-40GHz	5/20/2021	5/20/2022
⊠ Analyzer	Rohde & Schwarz	ESW44 (101534)	20Hz-44GHz	1/12/2021	1/12/2022
☐ Analyzer	Rohde & Schwarz	FS-Z60, 90, 140, and 220	40GHz-220GHz		12/22/2027
	Com-Power	PA-010 (171003)	100Hz-30MHz	10/14/2020	10/14/2021
	Com-Power	CPPA-102 (01254)	1-1000 MHz	10/14/2020	10/14/2021
	Com-Power	PAM-118A (551014)	0.5-18 GHz	10/14/2020	10/14/2021
	Com-Power	PAM-840A (461328)	18-40 GHz	10/14/2020	10/14/2021
☐ Power Mete		N1911A with N1921A	0.05-40 GHz	4/6/2021	4/6/2022
☐ Generator	Rohde & Schwarz	SMB100A6 (100150)	20Hz-6 GHz	4/6/2021	4/6/2022
☐ Generator	Rohde & Schwarz	SMBV100A6 (260771)	20Hz-6 GHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	BRC50722 (009).9G notch	30-18000 MHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	HPM50114 (017)1.5G HPF	30-18000 MHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	HPM50117 (063) 3G HPF	30-18000 MHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	HPM50105 (059) 6G HPF	30-18000 MHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	BRM50702 (172) 2G notch	30-18000 MHz	4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	BRC50703 (G102) 5G notch		4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	BRC50705 (024) 5G notch	30-18000 MHz	4/6/2021	4/6/2022
☐ Attenuator	Fairview	SA6NFNF100W-40 (1625)	30-18000 MHz	4/6/2021	4/6/2022
\square Attenuator	Mini-Circuits	VAT-3W2+ (1436)	30-6000 MHz	4/6/2021	4/6/2022
\square Attenuator	Mini-Circuits	VAT-3W2+ (1445)	30-6000 MHz	4/6/2021	4/6/2022
\square Attenuator	Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/6/2021	4/6/2022
\square Attenuator	Mini-Circuits	VAT-6W2+ (1438)	30-6000 MHz	4/6/2021	4/6/2022
\square Attenuator	Mini-Circuits	VAT-6W2+ (1736)	30-6000 MHz	4/6/2021	4/6/2022
	tion Davis	6312 (A81120N075)		11/4/2020	11/4/2021
Rogers Labs,		rmin International, Inc.		W000054 / 7	
4405 West 259		odel: A04272		CC ID: IPH-	
Louisburg, KS		st: 210729		C: 1792A-04	
Phone/Fax: (9	*	st to: CFR47 15.225, RSS-2		tember 29, 2	2021
Revision 2	Fil	e: A04272 NFC TstRpt 2107	/29 r2 Pa	age 39 of 42	



NVLAP Lab Code 2000 List of Test Eq			Calibration	Date (m/d/y)	<u>Due</u>
☐ Antenna:	Schwarzbeck M	odel VHBB 9124 (9124-627)		4/21/2020	4/21/2022
☐ Antenna:	Schwarzbeck M	odel: VULP 9118 A (VULP 9	118 A-534)	4/21/2020	4/21/2022
☐ Frequency (Counter: Leader I	DC-825 (8060153		4/6/2021	4/6/2022
☐ LISN: Com	-Power Model LI	-220A		10/14/2020	10/14/2021
☐ LISN: Com	-Power Model LI	-550C		10/14/2020	10/14/2021
☐ ISN: Com-F	Power Model ISN	T-8		4/6/2021	4/6/2022
☐ LISN: Fisch	ner Custom Comm	nunications Model: FCC-LISN	-50-16-2-08	4/6/2021	4/6/2022
\square Cable	Huber & Suhner	Inc. Sucoflex102ea(1.5M)(30	3072) 9kHz-40 GH	z 10/14/2020	10/14/2021
\square Cable	Huber & Suhner	Inc. Sucoflex102ea(L1M)(28	1183) 9kHz-40 GHz	2 10/14/2020	10/14/2021
\square Cable	Huber & Suhner	Inc. Sucoflex102ea(L4M)(28	1184) 9kHz-40 GHz	2 10/14/2020	10/14/2021
\square Cable	Huber & Suhner	Inc. Sucoflex102ea(L10M)(3	17546)9kHz-40 GH	z 10/14/2020	10/14/2021
\square Cable	Time Microway	e 4M-750HF290-750 (4M)	9kHz-24 GHz	2 10/14/2020	10/14/2021
☐ RF Filter	Micro-Tronics	BRC17663 (001) 9.3-9.5	notch 30-1800 MH	z 4/6/2021	4/6/2022
☐ RF Filter	Micro-Tronics	BRC19565 (001) 9.2-9.6	notch 30-1800 MH	z 10/16/2018	4/6/2022
\square Analyzer	HP	8562A (3051A05950)	9kHz-125GHz	4/6/2021	4/6/2022
\square Analyzer	HP External Mi	xers11571, 11970	25GHz-110GH	z 4/18/2015	4/18/2025
\square Analyzer	HP	8591EM (3628A00871)		4/21/2020	4/21/2022
☐ Wave Form	Generator Keysi	ght 33512B (MY57400128)		4/21/2020	4/6/2022
☐ Antenna: S	olar 9229-1 & 92	30-1		2/22/2021	2/22/2022
□ CDN: Com-	-Power Model CI	DN325E		10/14/2020	10/14/2021
☐ Injection Cl	amp Luthi Model	EM101		10/14/2020	10/14/2021
☐ Oscilloscop	e Scope: Tektron	ix MDO 4104		2/22/2021	2/22/2022
☐ EMC Trans	ient Generator H	/T TR 3000		2/22/2021	2/22/2022
☐ AC Power S	Source (Ametech,	California Instruments)		2/22/2021	2/22/2022
☐ Field Intens	ity Meter: EFM-0	018		2/22/2021	2/22/2022
☐ ESD Simula	ator: MZ-15			2/22/2021	2/22/2022
☐ R.F. Power	Amp ACS 230-5)W		not required	
☐ R.F. Power	Amp EIN Model	A301		not required	
☐ R.F. Power	Amp A.R. Model	: 10W 1010M7		not required	
☐ R.F. Power	not required				
☐ Tenney Ten	not required				
⊠ Shielded Ro	not required				
Rogers Labs, 4405 West 25 Louisburg, KS Phone/Fax: (9 Revision 2	9 th Terrace	Garmin International, Inc. Model: A04272 Test: 210729 Test to: CFR47 15.225, RS: File: A04272 NFC TstRpt 2	F I S-210 Date: Se	2W000054 / 7 FCC ID: IPH- C: 1792A-04 ptember 29, 2 Page 40 of 42	.04272 272 2021



Annex C Rogers Qualifications

Scot D. Rogers, Engineer

Rogers Labs, Inc.

Mr. Rogers has approximately 35 years' experience in the field of electronics. Working experience includes six years working in the automated controls industry and 6 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:

Bachelor of Science Degree in Electrical Engineering from Kansas State University

Bachelor of Science Degree in Business Administration Kansas State University

Several Specialized Training courses and seminars pertaining to Microprocessors and

Software programming

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 72W000054 / 72W000083

 4405 West 259th Terrace
 Model: A04272
 FCC ID: IPH-04272

 Louisburg, KS 66053
 Test: 210729
 IC: 1792A-04272

Phone/Fax: (913) 837-3214 Test to: CFR47 15.225, RSS-210 Date: September 29, 2021 Revision 2 File: A04272 NFC TstRpt 210729 r2 Page 41 of 42



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).

2021-02-19 through 2022-03-31

Effective Dates

OF COMPTEN OF COMPTEN

For the National Voluntary Laboratory Accreditation Program

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

Revision 2

Garmin International, Inc. Model: A04272

Test: 210729
Test to: CEP 47 15 22

Test to: CFR47 15.225, RSS-210 Day File: A04272 NFC TstRpt 210729 r2

SN's: 72W000054 / 72W000083 FCC ID: IPH-04272

IC: 1792A-04272 Date: September 29, 2021 Page 42 of 42