Test Report 2024-037

Version B
Issued 25 Apr 2024

Project GCL- GCL0256
Model Identifier A04743
Primary Test Standard
CFR 47, FCC Part 15.247
RSS-247 Issue 2: 2017

Garmin Compliance Lab

Garmin International
1200 E 151st Street
Olathe Kansas 66062 USA

Client-supplied Information	
FCC ID:	IPH-04743
IC ID:	1792A-04743
M/N:	A04743

See section 6 of this report regarding the presence or absence of accreditation logos or marks on this cover page.

1. Summary

The equipment or product described in section 5 of this report was tested at the Garmin Compliance Lab according to standards listed in section 6. This report focuses on the 2.4 GHz Bluetooth transceiver under the FHSS rules.

The product also includes 2.4 GHz BLE radio that are being certified under the DTS rules. To aid the reader, we have moved the reporting of DTS compliance into a separate report, GCL Test Report 2024-036. Some of the test records in this report may also provide data for those DTS radios. Please ignore any data for BLE radio that appear within the test records.

The results are as follows.

Parameter	Description	Key Performance Values	Result	Data starts at page
Radio Modulation	Summary of the kinds of communication this radio can achieve, as stated by the client. [RSS-GEN at Annex A item 10b]	Digitally modulated frequency hopping spread spectrum at rates as high as 3 Mbps.	Reported	N/A
Hopping Channels	The radio manages it use of channels appropriately. [15.247(a)(1); RSS-247 at 5.1]	The system uses 79 hopping channels separated by at least 2/3 of the 20 dB Bandwidth. Channels are used on an appropriately equal time basis.	PASS	12
DTS Bandwidth	The nature of the radio signal is broadband, being at least 500 kHz wide. [15.247(a)(2); RSS-247 at 5.2(a)]	Only relevant for DTS systems.	N/A	N/A
Other Bandwidths	Regulatory agencies also require the reporting of signal bandwidths using alternate processes. [2.202; RSS-GEN at 6.7]	These values are reported but have no actual performance requirements.	Reported	16
Transmit Power	The peak transmit power presented to the antenna is no greater than 1 Watt or 30 dBm. The effective radiated power is limited to 4 Watts or 36 dBm EIRP. [15.247(b); RSS-247 at 5.4(d)]	The maximum transmit power is 4.64 dBm or 1.66 mW.	PASS	21
Antenna Gain	The radio should not focus too much energy in any direction. Unless additional rules are applied, the antenna gain is no greater than 6 dBi. [15.247(b)(4) and (c)]	NT. The client stated that the antenna gain was 3 dBi and will document antenna gain separately.	NT	NT
Unwanted Emissions (Conducted Spurious)	The radio should not provide too much radio energy to the antenna at frequencies beyond its intended frequency band. [15.247(d); RSS-247 at 5.5]	Emissions outside the band must be reduced at least 20 dB from in-band levels. The measured reduction was at least 53.23 dB.	PASS	23

Restricted Bands	The radio must not emit in certain designated restricted frequency bands above a set of limit values. [15.247(d) and 15.205; RSS-247 at 3.3]	Emissions in the restricted bands were at least 16.98 dB below the applicable limits.	PASS	26
Power Spectral Density	The radio must not focus too much radio energy in a narrow frequency band. [15.247(e); RSS-247 at 5.2(b)]	Not relevant to FHSS systems.	N/A	N/A
Hybrid Systems	A radio that is both frequency hopping and digitally modulated should satisfy a combination of system rules. [15.247(f); RSS-247 at 5.3]	N/A. The radios described in this report are not subjected to the Hybrid System rules.	N/A	N/A
Frequency Hopping Rules	Frequency hopping systems have additional functional requirements. [15.247(g) and (h); RSS-247 at 5.1]	These functional requirements are design parameters, but not testable requirements.	NT	NT
Radio Safety	The radio emissions must meet public health & safety guidelines related to human exposure. [15.247(i) and 1.1307; RSS-Gen at 3.4]	NT. Client will report radio energy safety results separately.	NT	NT
Frequency Stability	The radio tuning must be robust over a range of temperature and supply voltage conditions. [RSS-Gen at 6.11]	Radio emissions remained within the allowed radio band under all environmental conditions tested.	PASS	30
Unwanted Emissions (Radiated Spurious)	While transmitting, the radiated emissions must not be too strong. [15.209, RSS-Gen at 8.9]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 9.6 dB of margin.	PASS	34
Unwanted Emissions (Mains Conducted)	While transmitting, the emissions conducted into the power mains must not be too strong. [15.207, RSS-Gen at 8.8]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 13.46 dB of margin.	PASS	44

NT (Not Tested) means the requirement may or may not be applicable, but the relevant measurement or test was not performed as part of this test project.

N/A (Not Applicable) means the lab judged that the test sample is exempt from the requirement.

Table 1: Summary of results

Report Organization

For convenience of the reader, this report is organized as follows:

1. Summary
2. Test Background
3. Report History and Approval
4. Test Sample Modifications and Special Conditions
5. Description of Equipment Tested
6. Test Standards Applied
7. Measurement Instrumentation Uncertainty
8. Selected Examples of Calculations
9. Environmental Conditions During Test
10. Immunity Performance Criteria

Annex: Test records are provided for each type of test, following the order and page numbering stated in the summary table. Concluding notes appear on the final page of this report.

Due to confidentiality, certain material (such as test setup photographs) has been removed from this report and placed in GCL Test Report 2024-038. That report is treated as a part of this document by way of this reference.

2. Test Background

The testing reported here was performed at the Garmin Compliance Lab, an organization within Garmin International, located at 1200 E 151st St, Olathe Kansas, USA. The contact telephone number is +1.913.397.8200.

The testing was performed on behalf of the Garmin design group, a separate organization located at 1200 E 151st St, Olathe Kansas, USA. Witnesses from the business group included: None.

Test Sample received: 22 Jan 2024
Test Start Date: 02 Feb 2024
Test End Date: 03 Mar 2024

The data in this test report apply only to the specific samples tested.

Upon receipt all test samples were believed to be properly assembled and ready for testing.

3. Report History and Approval

This report was written by Aditya Prakash and initially issued on 19 Mar 2024 as Version A. Version B of the report was created by Aditya Prakash on 25 Apr 2024 to make some editorial changes.

Report Technical Review: ______________________

David Arnett
Technical Lead EMC Engineer

Report Approval: ______________________

Shruti Kohli
Manager Test and Measurement (EMC, Reliability and Calibration)

4. Test Sample Modifications and Special Conditions

The following special conditions or usage attributes were judged during test to be necessary to achieve compliance with one or more of the standards listed in section 6 of this report:
None

The following modifications to the test sample(s) were made, and are judged necessary to achieve compliance with one or more of the standards listed in section 6 of this report:
None

5. Description of the Equipment Tested

5.1 Unique Identification

Product Model	A04743
Serial Numbers Tested	3453327361, 3453327344, 3453327110

This product tested is a mobile device for sharing data with the user and nearby electronic devices.

The client affirmed that the test samples will be representative of production in all relevant aspects.

5.2 Key Parameters

EUT Input Power:	5 Vdc
I/O Ports:	USB
Radio Transceivers:	Bluetooth, Bluetooth Low Energy
Radio Receivers:	None
Primary Functions:	Data collection and communication
Typical use:	Body worn
Highest internal frequency:	2.484 GHz
Firmware Revision	0.24

5.3 Operating modes

During test, the EUT was operated in one or more of the following modes.

Mode 1: M1 (Bt Tx). Bluetooth, sometimes called Bluetooth Classic, radio is transmitting consistently on a selected channel sending data using the BR (Basic Rate of 1 Mbps), EDR2 (Extended Data Rate of 2 Mbps) or EDR3 (Extended Data Rate of 3 Mbps) modulation types.

Mode 2: M2 (Bt lnk). Bluetooth Classic radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.

Mode 3: M3 (Ble Tx). Bluetooth Low Energy radio transmitting consistently on a selected channel at 1 Mbps or 2 Mbps

Mode 4: M4 (Ble lnk). Bluetooth Low Energy radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.

Mode 5: M14 (Idle). The EUT is powered on but it has not been actively linked to any companion devices. EUT may occasionally broadcast signals for device discovery.

5.4 EUT Arrangement

During test, the EUT components and associated support equipment were selected including the following arrangement sets.

Arrangement 1: A1 (Solo). The test sample operates from its battery and no external physical connections. No block diagram is needed for this arrangement.

Arrangement 2: A2 (USB.) The test sample is attached to USB adaptor which is connected to AC mains. The adaptor provides power to the sample over a cable but no user data. See the block diagram in Figure 1.

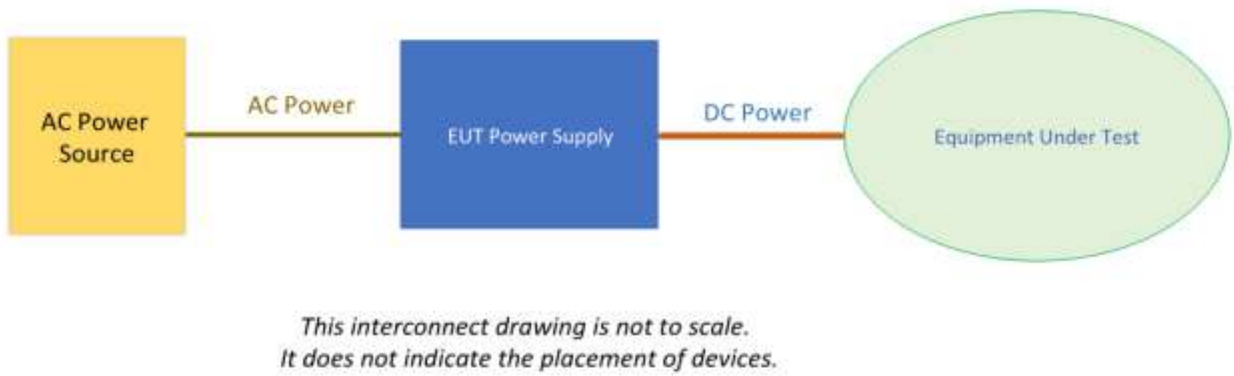

Figure 1: Block diagram of equipment arrangement A2

5.5 Associated Equipment (AE) used

Description	Manufacturer	Model	Serial Number
Power adaptor	Garmin	PSAF10R-050Q	P183100844A1

Table 2: List of associated equipment that may have been used during test

5.6 Cables used

Description	From	To	Length	EMC Treatment
USB Cable	EUT	Power Adapter	50 cm	None

Table 3: List of cables that may have been used during test

6 Test Standards Applied

6.1. Accredited Standards

The following test or measurement standards were applied and are within the scope of the lab's accreditation. All results in this report that cite these standards are presented as Accredited results consistent with ISO/IEC 17025.

AS/NZS 4268: 2017
CFR 47, FCC Part 15.247
ANSI C63.10: 2013 and ANSI C63.10: 2020
RSS-GEN Issue 5 Amd 2
RSS-247 Issue 3

6.2. Non-accredited Standards

The following test or measurement standards were applied and are either outside the scope of the lab's accreditation, or were performed in such a way that results are not presented as being fully accredited.

(None)

6.3 Variances

The following variances were applied to standards cited in this section.

Where different test standards cover the same test parameter or phenomenon, and the standards have compatible differences, the stricter of the requirements is typically applied. For example, a consolidated limit may be applied to emission tests selecting the strictest of the limits at each frequency. Likewise, if one standard requires a vertical antenna sweep with boresighting and another does not, swept motion with boresighting will typically be used as it is the more stringent requirement.

6.4 Laboratory Accreditation

The Garmin Compliance Lab, an organization within Garmin International, is registered with the US Federal Communication Commission as US1311. The lab is recognized by the Canada Department of Innovation, Science, and Economic Development (ISED) under CAB identifier US0233.

The Garmin Compliance Lab, an organization within Garmin International, is accredited by A2LA, Certificate No. 6162.01. The presence of the A2LA logo on the cover of this report indicates this is an accredited ISO/IEC 17025 test report. If the logo is absent, this report is not issued as an accredited report. Other marks and symbols adjacent to the A2LA logo are accreditation co-operations of which A2LA is a member under a mutual recognition agreement, and to which the Garmin Compliance Lab has been sublicensed.

7 Measurement Instrumentation Uncertainty

The lab has analyzed the sources of measurement instrumentation uncertainty. The analysis concludes that the actual measurement values cited in this report are accurate within the U_{LAB} intervals shown below with approximately 95% statistical confidence. Where the report shows a judgment that a test sample passes a test against a published limit based on these measured values, that judgment has a statistical confidence of 97.5% or greater. Measurement Instrumentation Uncertainty is one component of over-all measurement uncertainty, and other uncertainty components are not considered as part of this analysis.

The primary benchmark for measurement instrumentation uncertainty (MIU) in an electromagnetic compatibility (EMC) test lab is the set of U_{CISPR} values published in CISPR 16-4-2. In all cases where a U_{CISPR} value is published by CISPR, the analysis shows that U_{LAB} – this lab's estimated MIU – is better than the U_{CISPR} benchmark.

The secondary benchmark for MIU in an EMC lab performing radio transceiver tests is a set of uncertainty limit values published in various ETSI standards. In this report, U_{ETSI} is the most restrictive of the values found in the ETSI EN standards listed in section 5 of this report. The analysis principles are described in the ETSI TR documents listed there. In most cases U_{LAB} is better than the U_{ETSI} benchmark. Where U_{LAB} exceeds the U_{ETSI} benchmark cited here, that entry is preceded by an asterisk. When required by the ETSI EN standards, excess uncertainty will be added to the measurand before comparison to a limit. In an individual test report, staff may re-evaluate that excess uncertainty based on the uncertainty of the method used and the uncertainty limits of the actual ETSI EN standard being applied, and the revised uncertainty values will be shown in the test report.

Some measurement uncertainties analyzed and reported here are not addressed in CISPR 16-4-2 or the ETSI standards, as indicated by the entry 'None.'

Test Type		**U_{LAB}**	**U_{CISPR}**	**U_{ETSI}**
Conducted DC voltage		0.09% + 2 x LSDPV	None	1%
Conducted AC voltage below 500 Hz		1.0% + 3 x LSDPV	None	2%
Conducted Emissions, Mains Voltage		0.10% + 10 mV	None	None
Conducted Emissions, Mains Current		0.10% + 3 mA	None	None
Conducted Emissions, Mains Power		0.15% + 100 mW	None	None
Conducted Emissions, Power Mains, 9 kHz to 150 kHz		1.49 dB	3.8 dB	None
Conducted Emissions, Power Mains, 150 kHz to 30 MHz		1.40 dB	3.4 dB	None
Conducted Emissions, Cat 6 LCL, 150 kHz to 30 MHz		2.80dB	5 dB	None
Conducted Emissions, Cat 5 LCL, 150 kHz to 30 MHz		3.21 dB	5 dB	None
Conducted Emissions, Cat 3 LCL, 150 kHz to 30 MHz		4.24 dB	5 dB	None
Radiated Emissions, below 30 MHz		0.88 dB	None	6 dB
Radiated Emissions, 30 MHz to 1000 MHz		2.77 dB	6.3 dB	6 dB
Radiated Emissions, 1 GHz to 18 GHz		2.60 dB	5.2 & 5.5 dB	6 dB
Radiated Emissions, 18 GHz to 26.5 GHz		2.73 dB	None	6 dB
*Radio Signal Frequency Accuracy		*1.55 x 10^-7	None	1.0 x 10^-7
Radio Signal Occupied Bandwidth		0.95%	None	5%
Radio Power or Power Spectral Density		0.98 dB	None	1 dB
Temperature		0.38 °C	None	1 °C
Barometric Pressure		0.38 kPA	None	None
Relative Humidity		2.85% RH	None	±5% RH
Signal Timing	The greater of these three...	0.63 usec 0.01% of value 0.5 x LSDPV	None	None

Note: *LSDPV stands for the Least Significant Digit Place Value reported. In the value 1470 msec, the least significant digit is the 7. It has a 10 msec place value. The LSDPV is thus 10 msec and the maximum error due to roundoff would be 5 msec. If the time value were reported as 147<u>0</u> msec, the underscore indicates that the 0 is a significant figure and the error due to roundoff would be 0.5 msec. All digits provided to the right of a decimal point radix are significant.*

8 Selected Example Calculations

Certain regulators require samples of the calculations that lead from the raw measurement to the final result for AC Mains conducted and unintended radiated emissions. The assumption is that the lab performs raw measurements, then adds, subtracts, multiplies, or divides based on transducer factors, amplifier gains, and losses in the signal transmission path. In this lab, our CISPR 16 Receiver does not work that way. The calibration factors and losses and gains are provided to the receiver as detailed data files. These factors are applied in the RF measurement path prior to the detector. But as a step in the lab measurement process, staff frequently verify that these factors are applied correctly. They make a measurement with the factors applied inside the receiver, then they disable the factors and remeasure the result manually adding in the various relevant factors.

The transmission loss is measured including the combined losses and gains of preamplifiers, cables, and any band-selective filters. In many cases above 1 GHz it is a negative value, indicating that the preamplifier gain is greater than these other losses.

Here are examples of these calculations. The data in these examples was not taken as part of this project:

8.1 AC Mains conducted emissions at 22 MHz

(Raw measurement) + (AMN factor) + (transmission loss) = Result

(7.145 dBuV) + (9.812 dB) + (0.216 dB) = 17.173 dBuV

8.2 Radiated Emissions at 630 MHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(2.25 dBuV) + (27.80 dB/m) + (2.89 dB) = 32.94 dBuV/m

8.3 Radiated Emissions at 2.7 GHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(43.72 dBuV) + (32.22 dB/m) + (-36.09 dB) = 39.85 dBuV/m

9 Environmental Conditions During Test

Environmental conditions in the test lab were monitored during the test period. Temperature and humidity are controlled by an air handling system. As information to the reader, the conditions were observed at the values or within the ranges noted below. For any tests where environmental conditions are critical to test results and require further constraints or details, the test records in the annex may provide more specific information.

Temperature:	21.2 to 22.6 °C
Relative Humidity:	39.1% to 53% (non-condensing)
Barometric Pressure	95.6 to 99.2 kPa

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
Barometer	Traceable	6453	221702700	3-Aug-2022	1-Aug-2024

Table 4: Environmental monitoring device

10 Immunity Performance Criteria

If this report includes immunity tests then results have been categorized as Performance Criteria A, B, C, or D. The standards that the lab applied will define the details for A, B, and C, as well as which criterion is required for each type of test. They will also define the electrical stresses that were applied during each test. In a very general sense the observed criteria noted in this report are as follows:

Criterion A. The stress applied did not alter product operation. This criterion is generally used for ‘continuous’ stresses that can be present for a long time in the places the product will be used, or that can appear often, even though they may come and go over time.

Criterion B. The stress applied altered product operation, but the product self-recovered so that the user would not have to try to figure out how to restore it to full operation. This criterion is generally used for ‘transient’ stresses that appear briefly and occasionally, but are usually not present in the places the product will be used.

Criterion C. The stress applied altered product operation, but the user could restore it to full operation, for example by power cycling the product. This criterion is generally used for ‘transient’ stresses that appear briefly and only rarely in the places the product will be used.

Criterion D. This is not an official criterion in the standards, because it would be a failure of the requirements. This indication in a test record means the product was affected in a way that the user might not be able to correct. The effect could include some degree of hardware damage, or it could include loss of program files or data files necessary for operation.

Repeatability is an issue in all EMC immunity work. When the product operation changes unexpectedly during a test, and the change would fail the requirements of the standard, this is an anomaly. The test operator needs to determine whether the anomaly was a result of the applied electrical stress. The investigation is done by repeating the section of the test where the anomaly occurred three times. If the same or a similar anomaly occurs in any of the three repeat trials, it is confirmed as a response to the stress. If not, the anomaly is judged unreproducible and is not considered when judging the A, B, or C observed performance. Since there is usually no ability to confirm a Criterion D anomaly, these are usually treated as Criterion D upon a single occurrence.

Tests that require Criterion B performance will be judged to Pass if criteria A or B is observed. Similarly, tests that require Criterion C performance will be judged to Pass if criteria A, B, or C is observed.

ANNEX

The remainder of this report is an Annex containing individual test data records. These records are the basis for the judgments summarized in section 1 of this report. The Annex ends with a set of concluding notes regarding use of the report.

Test Record
FHSS ANSI Test TR32, TR33
Project GCL-0256

Test Date	5 Mar 2024
Test Personnel	Jim Solum
Product Model	A04743
Serial Number tested	3453327110
Operating Mode	M1(BtTx)
Arrangement	A2 (USB)
Input Power	5V dc
RF Output	Is not greater than 125 mW (21 dBm) conducted to the antenna
Test Standards:	FCC Part 15.247, ANSI C63.10, AS/NZS 4268, RSS-GEN, RSS-247 (as noted in Section 6 of the report).
Pass/Fail Judgment:	**PASS**
Test record created by:	**Jim Solum**
Date of this test record:	**6 Mar 2024**

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26.5GHz	Keysight	N9048B	MY63030120	13-Sep-2023	13-Sep-2024

Table TR32.1: Test equipment used

Test software used: Keysight PXE software 35.06, FHSS ANSI Occupancy Template v2.xlsx

Test Data

This test looks at details specific to frequency hopping systems in the referenced standards: the number of hopping channels; the relationship between 20 dB Occupied bandwidth and channel separation; and channel occupancy time.

This measurement requires that a coaxial feed line from the transmitter is available as a connector exterior to the test sample. This feed line and connector may be a part of the shipping product, or it may be a special modification to the product for testing purposes. The connector is attached via laboratory cables to the measurement instrument. Since the absolute signal amplitude is not relevant to these tests, the results may not have been adjusted to account for the losses in the laboratory cables.

Test Data: Hopping Channels

The test sample was placed in a test mode where it transmits on its various frequency channels while hopping. The spectrum analyzer scanned a frequency range that included these frequencies in Max Hold condition. The resulting spectra are attached, showing that the sample uses each of the 79 hopping frequencies from 2402 MHz to 2480 MHz, also confirming a channel separation of 1 MHz.

Figure TR32.1: Spectral data, Bluetooth Basic Rate transmission, showing channels used.

Test Data: Bandwidth and Channel Separation

The 20 dB Occupied bandwidth (OBW20) was measured for each modulation type, with the transmission fixed on low, middle, and high channels. The maximum bandwidth observed is highlighted in yellow, and the spectrum image for that case is also provided.

The standards require that the hopping channel separation is no less than OBW20 if the transmitted power is above 125 mW. For lower power transmissions, the hopping channel separation must be no less than two-thirds of OBW20. This second case can also be expressed as limiting OBW20 to 1.5 times the channel separation. Based on the 1 MHz separation between hopping channel, and the output power of the transmitter, the 20 dB occupied bandwidth must be no greater than 1.5 MHz. The data below shows compliance with this limit.

	2402	2440	2480
Bluetooth BR	**1.032**	**1.031**	**1.028**
Bluetooth EDR2	**1.178**	**1.178**	**1.179**
Bluetooth EDR3	**1.186**	**1.187**	**1.188**

Table TR32.2: Summary of 20 dB Occupied Bandwidth results in MHz

Figure TR32.2: Spectral data for Bluetooth EDR3 modulation at 2480 MHz

Test Data: Channel Occupancy

The channel occupancy requirement ensures that the transmissions are distributed consistently across the hopping channels. The measurement is made on each of the three randomly selected channels for a period of 0.4 seconds multiplied by the number of hopping channels. For this product, that is a measurement period of 31.6 seconds. During that time, the sum of the transmission times on the selected channel cannot exceed the limit of 0.4 seconds.

This testing is performed at three test channel frequencies, randomly selected within a range. The first range is 2402 to 2427 MHz. The second test frequency range is 2428 to 2454 MHz. The final range is 2455 to 2480 MHz.

The test sample was placed in a test mode where it transmits on its various frequency channels while hopping. The transmissions were measured while the test equipment was tuned to each one of the three test channels using a detector more narrow than the OBW20 value. This provides a record of transmissions only on the selected channel over time. A spreadsheet analyzed the data to determine channel occupancy -- the total sum of time that the transmitter was on the selected channel. The maximum channel occupancy values is highlighted in yellow, and a zero-span time plot image for that case is also provided.

Freq (MHz)	2405	2447	2477
BTBR	0.238	0.252	0.248
BT EDR2	0.251	0.258	0.235
BT EDR3	0.209	0.252	0.228

Table TR32.3: Summary of Channel Occupancy results in seconds

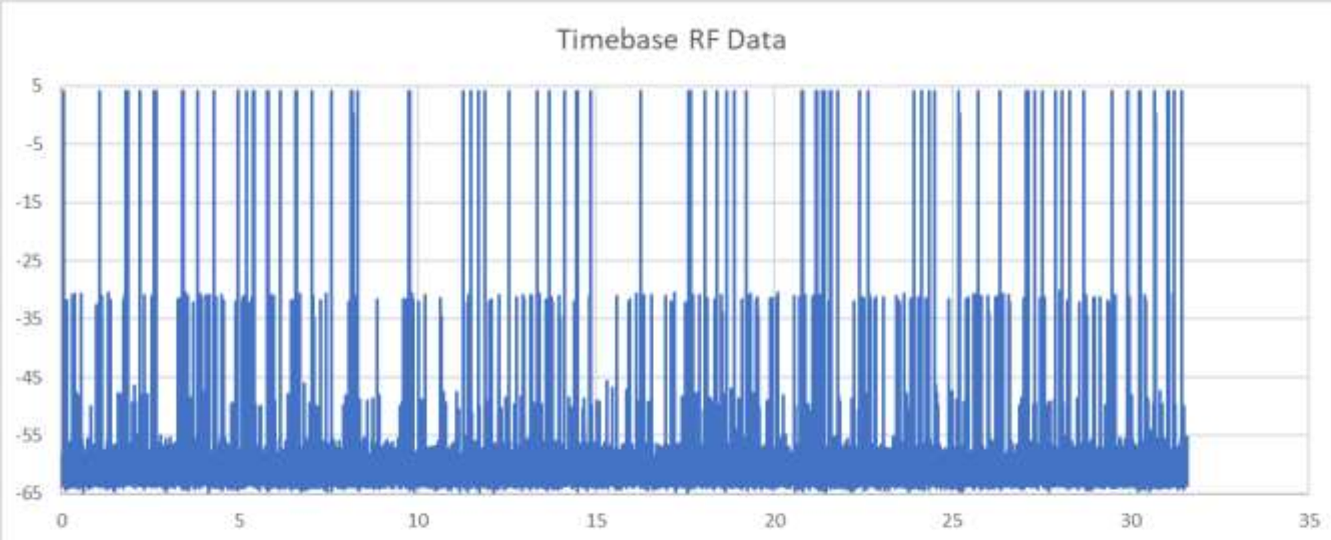

Figure TR32.3: Channel Occupancy time data for Bluetooth EDR2 Rate modulation at 2447 MHz

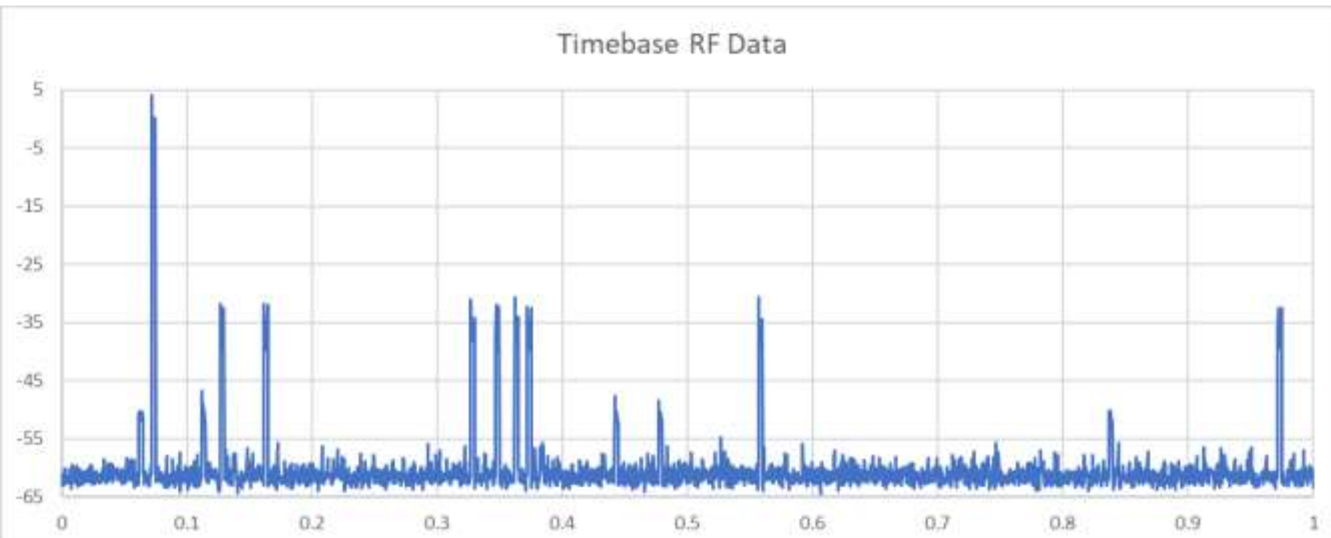

Figure TR32.4: First second of the Channel Occupancy time data for improved clarity

This line is the end of the test record.

Test Record
Transmitter Bandwidth Tests
Test IDs TR09
Project GCL0256

Test Date(s) 29 Feb 2024
Test Personnel Jim Solum

Product Model A04743
Serial Number tested 3453327110

Operating Mode M1 (BtTx)
Arrangement A2 (USB)
Input Power 5 Vdc

Test Standards: FCC Part 2.202, ANSI C63.10, TRC-43, RSS-GEN (as noted in Section 6 of the report).

Radio Protocol Bluetooth
Radio Band 2400 to 2483.5 MHz

Pass/Fail Judgment: Reported

Test record created by: Jim Solum
Date of this record: 29 Feb 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26.5GHz	Keysight	N9048B	MY63030120	13-Sep-2023	13-Sep-2024

Table TR09.1: List of test equipment used

Test Software Used: Keysight PXE firmware A.35.06

Background
There are regulatory requirements to present two additional types of bandwidth analyses: 99% Occupied Bandwidth and Necessary Bandwidth. There are no limits or functional requirements around these data, beyond a reporting requirement. The contents of this test record are for information, and do not affect compliance of the devices that are the subject of this report.

For the Bluetooth radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

Test Setup

This block diagram shows the test equipment setup.

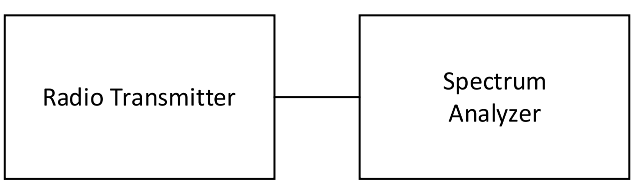

Figure TR09.1: Test setup

Occupied Bandwidth, 99% Test Method
During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified percentage of the total power observed. The spectrum is numerous times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

Occupied Bandwidth, 99% Test Data
The data for each type of bandwidth is summarized below, followed by the spectral data for the cases highlighted in yellow. The analysis threshold for this test was the bandwidth containing 99% of the observed power using the ANSI C63.10 method. The standards require testing a frequency near the bottom, middle, and top of the band. The measured bandwidth data have MHz as their units of measure.

	2402	2440	2480
Bluetooth BR	**0.9259**	**0.9265**	**0.9120**
Bluetooth EDR2	**1.1358**	**1.1237**	**1.1232**
Bluetooth EDR3	**1.1306**	**1.1310**	**1.1319**

Table TR09.2: Summary of 99% bandwidth data in MHz for Bluetooth modes

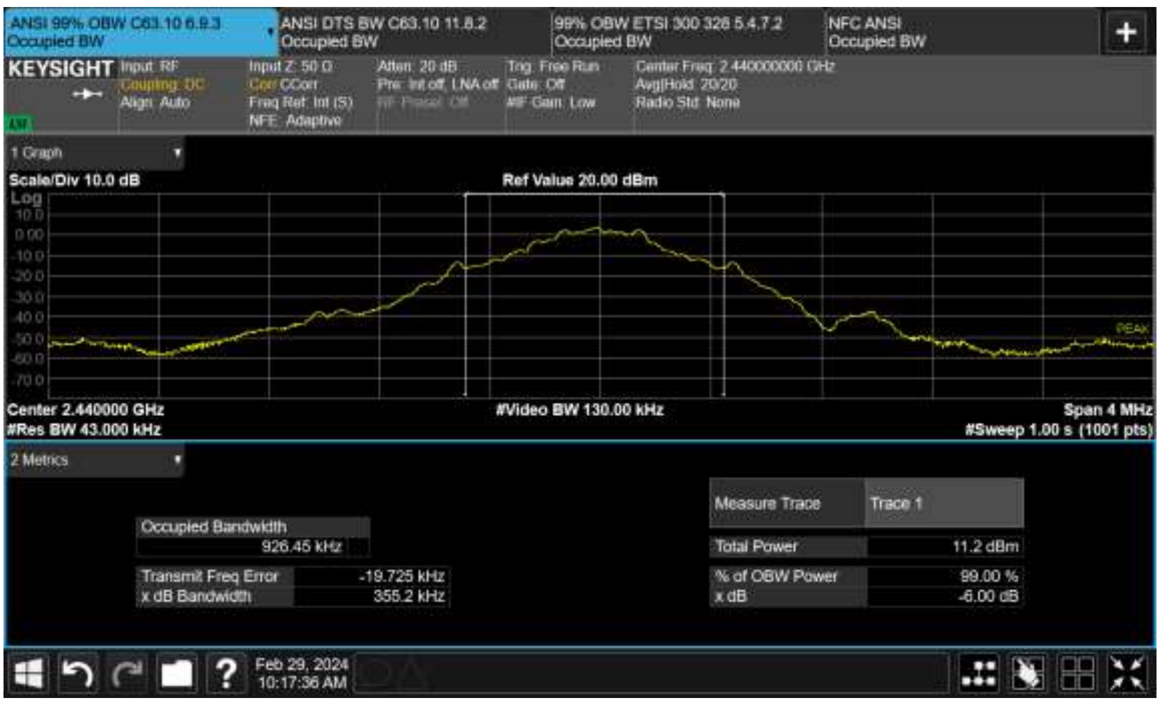

Figure TR09.2: Bandwidth data for Bluetooth at 2440 MHz

Figure TR09.3: Bandwidth data for Bluetooth ERD2 at 2402 MHz

Figure TR09.4: Bandwidth data for Bluetooth EDR3 at 2480 MHz

Necessary Bandwidth Calculations
The Necessary Bandwidth is a theoretical value based on the specifications for a communication protocol, rather than the hardware implementation and a subsequent lab measurement. The analysis methods in FCC Part 2.202 and TRC-43 are the same for Bluetooth, ANT, and IEEE 802.11b WiFi. However, they differ for IEEE 802.11g and 11n systems because the Canadian TRC-43 standard provides different analysis methods for Orthogonal Frequency Division Multiplexing systems (OFDM). The tables below will show the analysis for most of the radios signals as a combined approach, then separately analyze the results for IEEE 802.11g and n systems. The tables below may include radio protocols that are not part of the product being evaluated.

The radio modulation schemes for Ant, for the various Bluetooth protocols, and for IEEE 802.11 b WiFi are a mix of Phase Shift Key (PSK) and Quadrature Amplitude Modulation (QAM) techniques. The Necessary Bandwidth calculations use the equations from 47CFR Part 2.202(g) table section 6. We have set the variable K=1, which leaves the equation for both PSK and QAM as:

$$B_N = 2R / \log_2(S)$$

where B_N is the Necessary Bandwidth, R is the bit rate, and S is the number of signaling states.

Radio Type	R Mbps	K	S	LogBase2 of (S)	BN (MHz)
ANT / ANT+	1	1	2	1	2

Table TR03.101: Necessary Bandwidth for ANT and ANT+ Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	Method	R Mbps	K	S	LogBase2 of (S)	BN (MHz)
Bluetooth	BR	GFSK	1	1	2	1	2
	EDR2	Pi/4 DPSK	2	1	4	2	2
	EDR3	8DPSK	3	1	8	3	2
BLE	1Mbps	GFSK	1	1	2	1	2
	2Mbps	DQPSK	2	1	4	2	2

Table TR09.102: Necessary Bandwidth for Bluetooth Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	BN (MHz)
802.11 b	1	1	1	2	1	2
	2	2	1	4	2	2
	5.5	5.5	1	4	2	5.5
	11	11	1	4	2	11

Table TR09.103: Necessary Bandwidth for IEEE 802.11 b Radio Protocol (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	BN (MHz)
802.11 g	6	6	1	2	1	12
	9	9	1	2	1	18
	12	12	1	4	2	12
	18	18	1	4	2	18
	24	24	1	16	4	12
	36	36	1	16	4	18
	48	48	1	64	6	16
	54	54	1	64	6	18
802.11 n	MCS0	7.2	1	2	1	14.4
	MCS1	14.4	1	4	2	14.4
	MCS2	21.7	1	4	2	21.7
	MCS3	28.9	1	16	4	14.5
	MCS4	43.3	1	16	4	21.7
	MCS5	57.8	1	64	6	19.3
	MCS6	65	1	64	6	21.7
	MCS7	72.2	1	64	6	24.1

Table TR09.104: Necessary Bandwidth for IEEE 802.11 g and n 20 MHz Radio Protocols (FCC)

As a note, the bit rate for IEEE 802.11 n WiFi is calculated based on the IEEE standard's short guard interval of 400 nsec. If only the long guard interval of 800 nsec were implemented, the bit rate for MCS7would decrease to 65 Mbps for a Necessary Bandwidth of 21.7 MHz.

The TRC-43 method for OFDM signals simply multiplies the number of subcarriers, K, and the subcarrier spacing, N_S. In both cases, Ns is 312.5 kHz. The count of subcarriers includes nulls. So for example, 802.11 n uses 4 pilot subcarriers, 52 data subcarriers, and one null suppressed subcarrier in the middle for 57 total subcarrier channels.

$B_N = N_S * K$

Radio Type	Ns (MHz)	K	BN (MHz)
802.11g	0.3125	53	16.6
802.11n	0.3125	57	17.8

Table TR09.105: Necessary Bandwidth for IEEE 802.11 g and n 20 MHz Radio Protocols (TRC-43)

This line is the end of the test record.

Test Record
Transmitter Power
Test IDs TR01
Project GCL0256

Test Date(s)	28 Feb 2024
Test Personnel	Jim Solum
Product Model	A04274
Serial Number tested	441085073
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Input Power	5Vdc
Test Standards:	FCC Part 15, ANSI C63.10, RSS-GEN, RSS-247 (as noted in Section 6 of the report). FCC Part 2.1091, FCC Part 2.1093, RSS-102, ANSI C95.3
Antenna Gain	3 dBi, as reported by the client
Radio Protocol	Bluetooth
Pass/Fail Judgment:	**PASS**
Test record created by:	**Jim Solum**
Date of this record:	**29 Feb 2024**

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
RF Power Sensor	Rohde&Schwarz	NRP8S	109927	7-Jul-2023	1-Jul-2024

Table TR01.1: List of test equipment used

Software used: Rohde & Schwarz Power Viewer V11.3; TimePowerAnalysisSpreadsheetv11.xls

Test Method

The basic test standards provide options for the time evaluation test method. The following test methods were applied.

ANSI C63.10: 11.9.1.3

Transmit Power Data

Each measurement is made conducted from the antenna port with the transmitter on a specified channel and in a selected transmission protocol. Where standards cited here apply harmonized test methods and different limits, the more strict limit has applied.

The ANSI method finds the highest value (numerical peak) and applies the 21 dBm limit from the US and Canadian standards. All values met the limit with better than 10 dB of margin.

The results are shown below. The lowest and highest operating channel frequencies for Bluetooth are 2402 MHz and 2480 MHz. Yellow highlighted cells indicate the highest power value for each radio protocol.

Frequency	(MHz)	2402	2440	2480
Bluetooth	Basic	**4.00**	**4.35**	**4.64**
Bluetooth	EDR2	**3.94**	**4.29**	**4.57**
Bluetooth	EDR3	**3.92**	**4.29**	**4.60**

Table TR01.2: Transmit Power Summary, with units of dBm

Additional Transmit Power Data Analysis

The technical requirements for safety to RF exposure also look at transmitter power. Since data from this report may be compared with data from RF exposure reports, this lab has performed a further analysis of the same raw data for power over time used above. This analysis applies standards such as FCC Part 2.1091, FCC Part 2.1093, RSS-102, ANSI C95.3, EN/IEC 62311, or EN 62479.

These data analyses look at average power over time in linear milliwatt units. These data are averaged over a time period no longer than 1 second.

Frequency	(MHz)	2402	2440	2480
Bluetooth	Basic	**1.43**	**1.55**	**1.66**
Bluetooth	EDR2	**0.70**	**0.76**	**0.81**
Bluetooth	EDR3	**0.69**	**0.76**	**0.81**

Table TR01.3: Additional RF exposure power summary, with units of milliwatt

Setup Diagram

The following block diagrams show how the EUT and test equipment is arranged for test. The client provided a short length of cable to bring the signals out to a connector. This cable was found to have 0.7 dB of loss in this frequency range. This factor was taken into account during the data analysis.

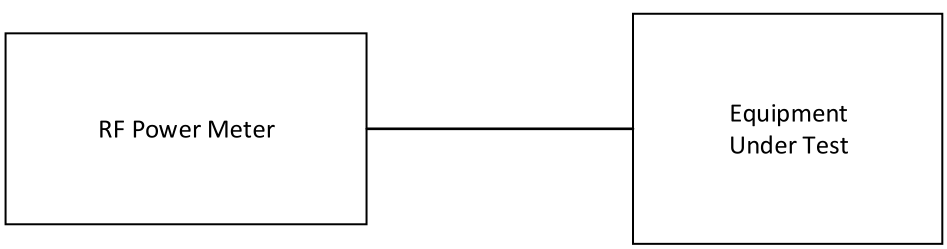

Figure TR01.1: Test equipment setup

This line is the end of the test record.

Test Record

Conducted Spurious Emissions
Test ID TR36
Project GCL-0256

Test Date(s)	1 Mar 2024
Test Personnel	Jim Solum
Product Model	A04743
Serial Number tested	3453327110
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Input Power	5 Vdc
Test Standards:	FCC Part 15, ANSI C63.10, RSS-GEN, RSS-247 (as noted in Section 6 of the report).
Pass/Fail Judgment:	**PASS**
Test record created by:	**Jim Solum**
Date of this test record:	**1 Mar2024**

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26.5GHz	Keysight	N9048B	MY63030120	13-Sep-2023	13-Sep-2024

Table TR36.1: Test equipment used

Software used: Keysight PXE software. A.35.06

Test Method

The basic test standards provide options for the test method. The following test methods were applied.
ANSI C63.10: 11.11.2 and 11.11.3

Test Setup

This block diagram shows the test equipment setup.

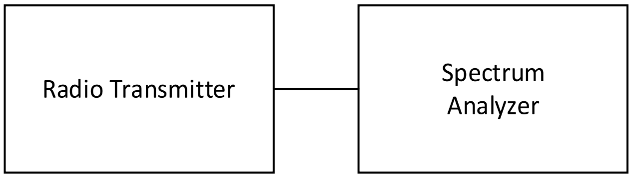

Figure TR36.1: Test setup

Test Data

The conducted spurious emission test measures the strength of intentional and unintentional radio signals conducted from the transmitter to the antenna across a wide range of frequencies. It does not evaluate whether intentional signals meet specific limits. Rather, it ensures that magnitudes unintentional signals are sufficiently reduced relative to the intentional signal to satisfy the requirements of the relevant standards.

This measurement requires that a coaxial feed line from the transmitter is available as a connector exterior to the test sample. This feed line and connector may be a part of the shipping product, or it may be a special modification to the product for testing purposes. The connector is attached via laboratory cables to the measurement instrument. The results have been adjusted to account for the losses in the laboratory cables. Where feasible, the losses of any added feed lines are also included in that adjustment.

Data is collected using the required detector function(s) across the frequency range. The instrument uses a 100 kHz bandwidth detector.

The data table below shows the final measurement data which may be at harmonics of the carrier, or at frequencies that represent one of the highest data points measured.

The peak level of the fundamental is also identified. The harmonics or spurious emissions must be reduced from this fundamental level by 20 dBc. This harmonic limit is calculated and used to determine compliance. A reduction from the carrier that is greater that 20 is a passing result. The minimum margin from the peak level for each mode are highlighted in yellow.

Data plots are provided for the worst-case data sets. One plot shows the spectrum at the carrier, and another shows the spectrum across the band. On this second plot, a green reference line is at approximately the 20 dBc maximum spurious emission level.

		2402	2440	2480
BT	BR	53.23	55.02	58.38
	EDR2	58.34	55.60	61.85
	EDR3	54.05	55.05	-48.26

Table TR36.2: Results Summary

Figure TR36.2: Reference level measurement for Bluetooth Basic Rate at 2402 MHz

	Freq (GHz)	dBm
1	7.21	-49.41
2	2.40	-49.48
3	2.40	-49.80
4	24.78	-57.37
5	24.77	-57.45
6	24.93	-57.80
7	24.77	-57.94
8	24.80	-58.09
9	24.81	-58.13
10	24.36	-58.16
11	23.45	-58.21
12	24.08	-58.30
13	24.84	-58.42
14	24.90	-58.45
15	24.83	-58.46
16	24.04	-58.52
17	24.82	-58.67
18	24.84	-58.73
19	24.76	-58.73
20	24.84	-58.75

Figure TR36.3: Spectral data for Bluetooth Basic Rate at 2402 MHz

This line is the end of the test record.

Test Record
Radiated Emission Test RE02
Project GCL0256

Test Date(s)	29 Feb 2024
Test Personnel	David Kerr
Product Model	A04743
Serial Number tested	3453327361
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Input Power	USB 5 Vdc
Test Standards:	FCC Part 15 (as noted in Section 6 of the report)
Frequency Range:	Restricted Bands (2200-2300 MHz, 2310-2390 MHz, 2483.5-2500 MHz)
Pass/Fail Judgment:	**PASS**
Test record created by:	**David A Kerr**
Date of this record:	**01 Mar 2024**

Original record, Version A.

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	227596	14-Sep-2023	14-Sep-2025
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-0/0	1	Calibration	Not Required
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025

Table RE02.1: Test Equipment Used

Software Used
Keysight PXE receiver software A.32.06, RE Signal Maximization Tool v2023Jul14.xlsx

Test Data

This restricted band investigation began with a benchtop setup wherein the emissions in the restricted bands were observed from a modified test sample with an RF output cable replacing the onboard antenna. The actual emission levels within restricted bands in many of the test sample's available transmission modes are too low to be reliably measured in the radiated environment. By applying the required peak and average detectors and bandwidths to the signals direct from the transmitter, lab staff identified the worst-case operational modes. These were then measured using an unmodified unit in the required radiated environment.

The radiated emission test began with a preliminary scan in each restricted band at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Final field strength measurements were taken in that set of positions.

Restricted band measurements in the lower band were made while the transmitter was tuned to its lowest frequency of 2402 MHz for the 1 Mbps data rate, and 2404 MHz for the 2 Mbps data rate. Measurements in the upper band were made while the transmitter was tuned to its highest frequency of 2480 MHz for the 1 Mbps data rate, and 2478 MHz for the 2 Mbps data rate.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The tables show the selected final measurement data between the FCC restricted bands. It includes a the strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC restricted band Class B Limit at 3m.

Frequency (MHz)	Avg Limit (dBuV/m)	Pk Limit (dBuV/m)	Avg Level (dBuV/m)	Pk Level (dBuV/m)	Av Margin (dB)	Pk Margin (dB)	Azimuth (degree)	Height (mm)	Polarity ---
2387.3	54	74	35.701	50.07	18.299	23.93	-150	2176	HORZ
2354	54	74	36.09	49.082	17.91	24.918	-150	2176	HORZ

Table RE02.2: FCC restricted bands from 2200 to 2390 MHz

Frequency (MHz)	Avg Limit (dBuV/m)	Pk Limit (dBuV/m)	Avg Level (dBuV/m)	Pk Level (dBuV/m)	Av Margin (dB)	Pk Margin (dB)	Azimuth (degree)	Height (mm)	Polarity ---
2483.8	54	74	36.931	51.236	17.069	22.764	-147	1009	HORZ
2483.5	54	74	37.016	51.016	16.984	22.984	-147	1009	HORZ

Table RE02.3: FCC restricted band from 2483.5 to 2500 MHz

The graphs below show the background spectrum observed during pre-scan, as well as the final data points from the table above.

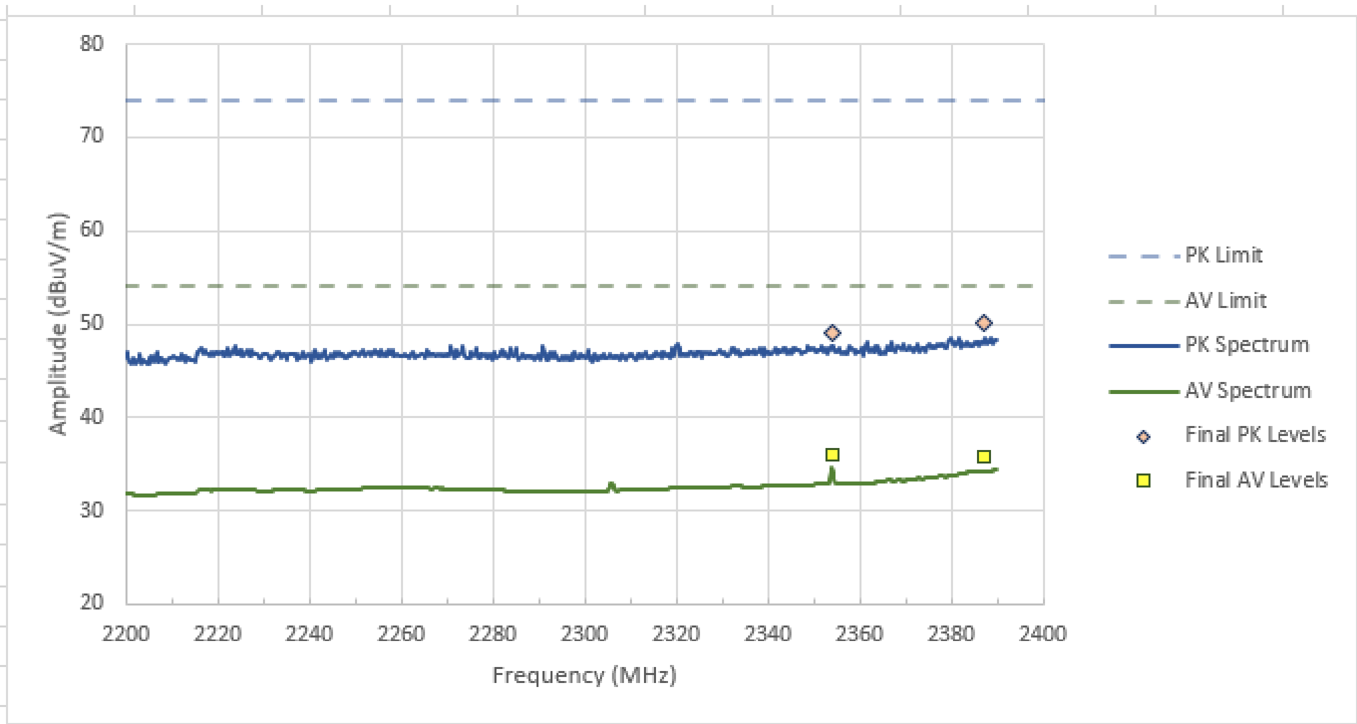

Figure RE02.1: FCC restricted band spectral data from 2200 to 2390 MHz

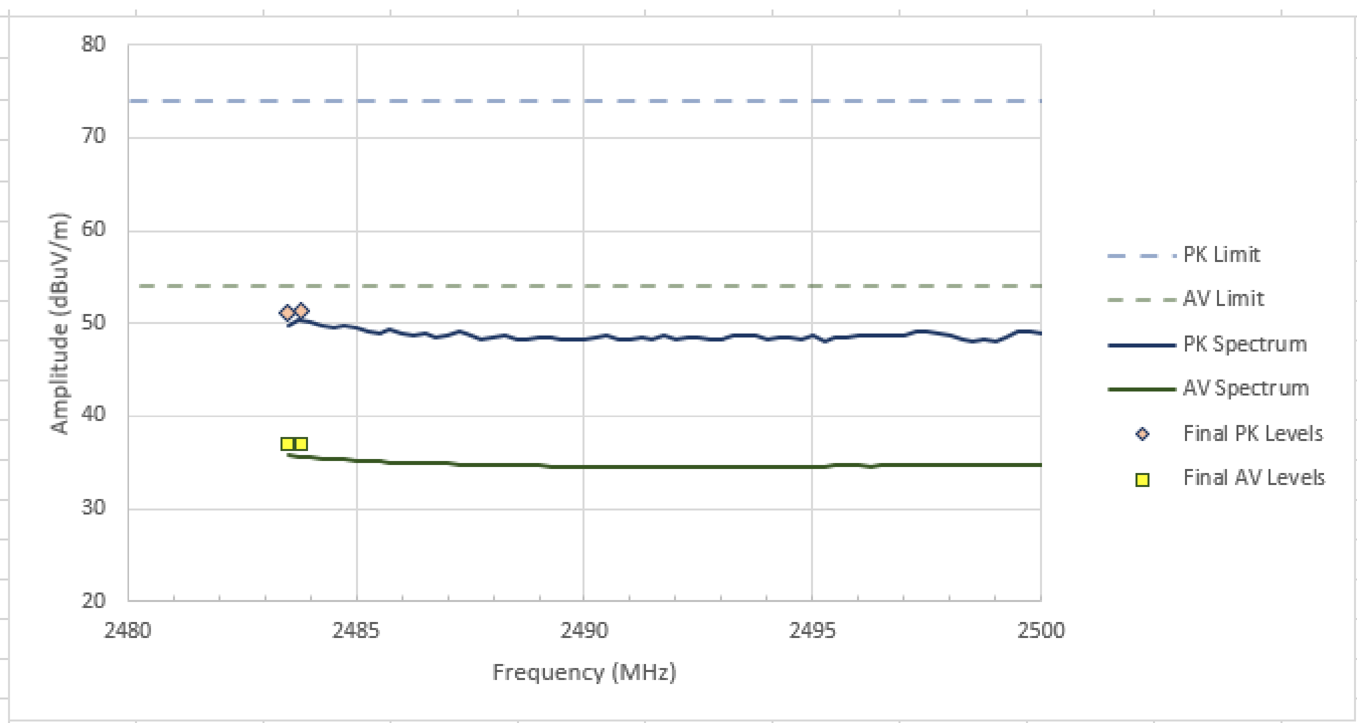

Figure RE02.2: FCC restricted band spectral data from 2483.5 to 2500 MHz

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE02.3: EUT test setup, primary view

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE02.4: EUT test setup, reverse view

This line is the end of the test record.

Test Record
Transmitter Frequency Stability
Test ID TR27
Project GCL-0256

Test Date	4 Mar 2024
Test Personnel	Jim Solum
Product Model	A04743
Serial Number tested	3453327110
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Nominal Input Power	5 Vdc
Test Standards:	FCC part 15, RSS-GEN, ANSI C63.10 (as noted in Section 6 of the report)
Radio Protocol	Bluetooth (EDR3)

Pass/Fail Judgment: **PASS**

Test record created by: **Jim Solum**
Date this record: **5 Mar 2024**
Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26.5GHz	Keysight	N9048B	MY63030120	13-Sep-2023	13-Sep-2024
DMM Multimeter	FLUKE	79 III	71740743	5-Apr-2023	1-Apr-2024
Programmable DC power source	Keithley	2260B-30-72 720 W	1411917	21-Apr-2023	15-Apr-2024
Thermometer	Thermco	ACCD370P	220608121	26-Aug-2022	1-Sep-2024
Thermal Chamber	Tenney	T2RC	32774-02	Calibration	Not Required

Table TR27.1: Equipment used

Software Used: PXE Software Revision A.35.06, FrequencyStabilityAnalysistemplateV1.xlsx

Test Method

The RSS-GEN standard requires a frequency stability test with variations in temperature and supply voltage, but RSS-247 does not provide further guidance on this test. RSS-GEN suggests one possible criterion for unlicensed transmitters could be that the carrier remains in the central 80% of the frequency band. However, the Bluetooth protocols have carriers that are intentionally closer to the band edge. The basic concept applied here is that the 6 dBc Occupied Bandwidth of the modulated signal should remain within the 2400-2483.5 MHz radio band. To evaluate this, the peak carrier level and the level at the band edge are compared to ensure that signal at the band edge is reduced at least 6 dB across the specified range of voltages and temperatures. The data is reported in terms of dBc as a positive value, meaning we report the ratio between the peak carrier signal level and the level at the band edge to demonstrate that the resulting intentional signals remained within the allowed band.

Bluetooth uses channel plans with a minimum transmission center frequency at 2402 MHz and a maximum at 2480 MHz. Bluetooth EDR3 was selected as the worst case among radios to investigate, due to its higher occupied bandwidth. Additional information regarding Bluetooth Basic Rate, EDR2, and EDR3 is provided in the following table.

	First Channel	Last Channel	Channel spacing	Data rate
	MHz	MHz	MHz	Mb/s
Bluetooth BR	2402	2480	1	1
Bluetooth EDR2	2402	2480	1	2
Bluetooth EDR3	2402	2480	1	3

Table TR27.2 Bluetooth overview

The test sample was placed in a thermal chamber and connected to an appropriate dc power source. The sample has an appropriate output to be used for conducted measurement. The analyzer was set up to detect radio signals from the test sample.

The test temperatures range is from +55°C to -15°C with a 10°C decrement at each test step (5°C at +55°C and -15°C) for nominal input voltage (5 V). For the voltage variation test at +20°C, the voltage is to be varied 15% above and below nominal input voltage. Data was taken at 5 Vdc and 15% lower at 4.25 Vdc plus 15% higher at 5.75 Vdc.

Test Data

The various standards require observation of the stability for transmission frequency and/or power at certain environmental extremes. The reference is performance on nominal input voltage and a temperature of 20°C. Where the standards cited here apply to different limits or conditions, the most stringent limits and conditions have been applied.

Each measurement is made conducted from the antenna port of the sample with the transmitter continuous “ON” at a specified channel and in a selected transmission protocol. The amplitude results are unscaled and may not include the effects such as cable losses. Such effects are minimal when comparing two nearby data points in a single spectral scan.

Yellow highlights indicate the highest level for a protocol, for which an image of the spectrum is also provided. In the spectral plots, the data sets have been combined to present the low and high channel results side by side. Orange diamond markers indicate the spectral peak, while the black square markers are at the 2400 MHz or 2483.5 MHz band edge.

Tx Mode	Temp	Volts	Low Ch.	High Ch.
Bluetooth	˚C	Vdc	dBc	dBc
BT EDR3	55	5	32.2	53.4
BT EDR3	50	5	32.0	52.7
BT EDR3	40	5	32.0	53.3
BT EDR3	30	5	32.2	52.4
BT EDR3	20	5	31.7	53.1
BT EDR3	10	5	32.0	53.6
BT EDR3	0	5	31.9	53.0
BT EDR3	-10	5	32.0	53.5
BT EDR3	-15	5	31.2	52.8

Table TR27.3 Difference between peak and band edge levels for Bluetooth EDR3 transmissions during temperature variations

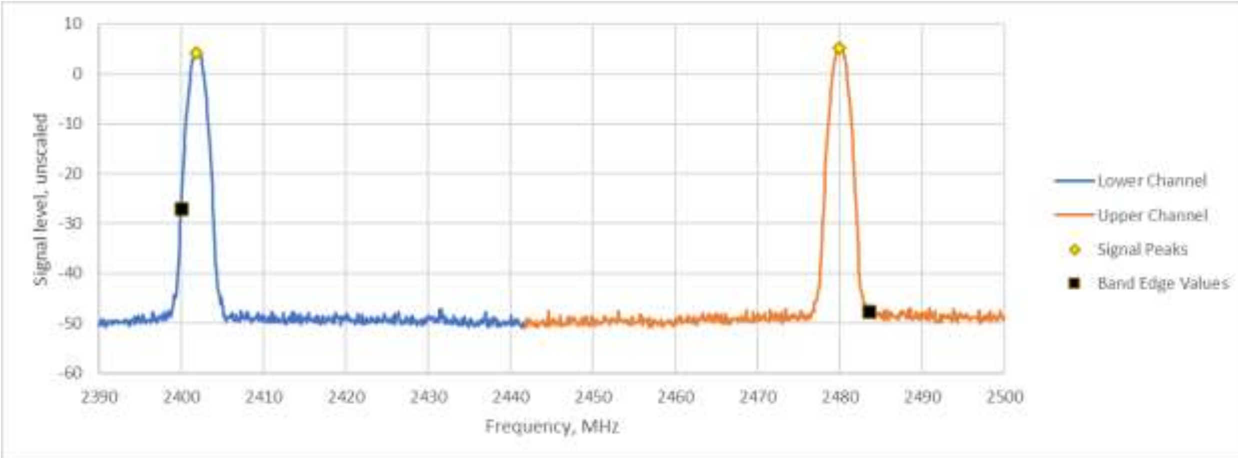

Figure TR27.1: Spectral data for Bluetooth EDR3 at -15°C

Tx Mode	Temp	Volts	Low Ch.	High Ch.
Bluetooth	˚C	Vdc	dBc	dBc
BT EDR3	20	4.25	31.7	52.5
BT EDR3	20	5	31.7	53.1
BT EDR3	20	5.75	31.7	52.7

Table TR27.4 Difference between peak and band edge levels for Bluetooth EDR3 transmissions at 20°C during voltage variations

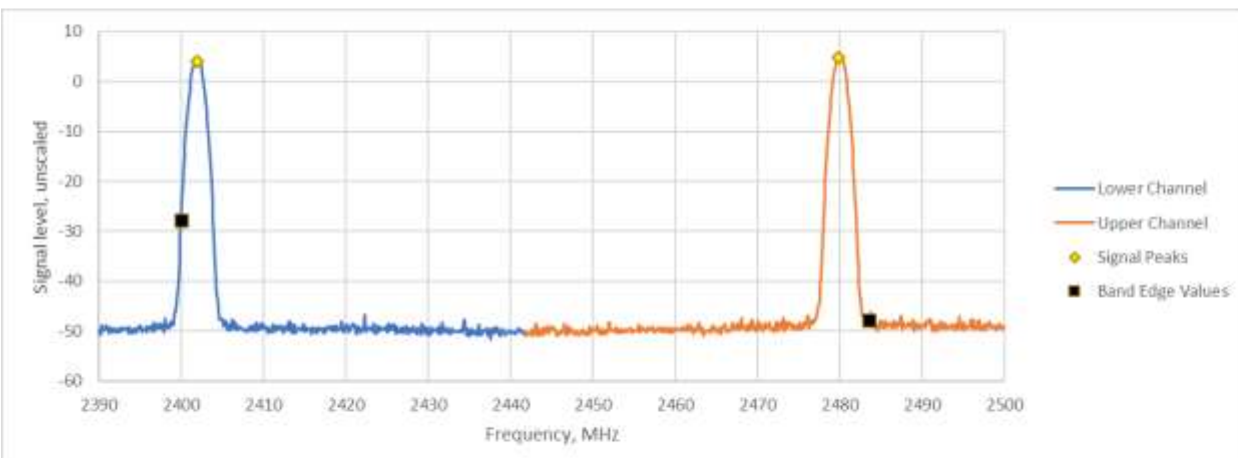

Figure TR27.2: Spectral data for Bluetooth EDR3 at 20°C and 4.25 Vdc

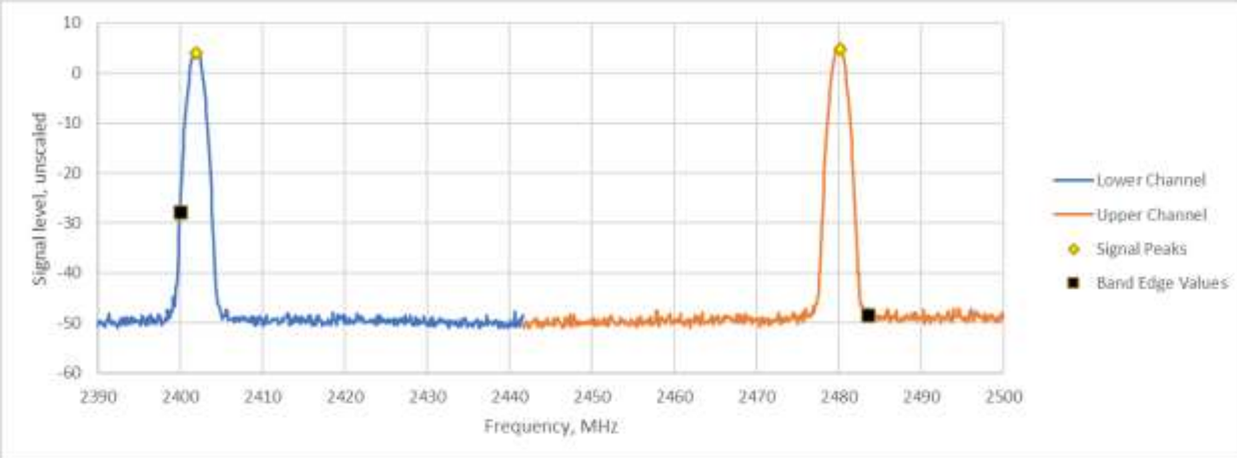

Figure TR27.3: Spectral data for Bluetooth EDR3 at 20°C and 5 Vdc

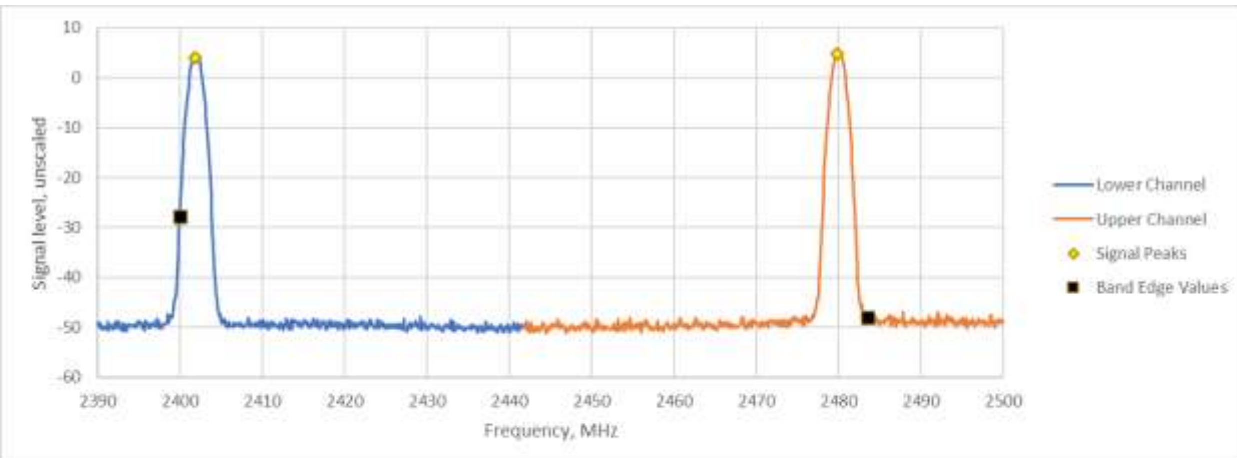

Figure TR27.4: Spectral data for Bluetooth EDR3 at 20°C and 5.75 Vdc

Setup Block Diagram

The following block diagrams show the EUT configured and arranged in the manner which it was measured.

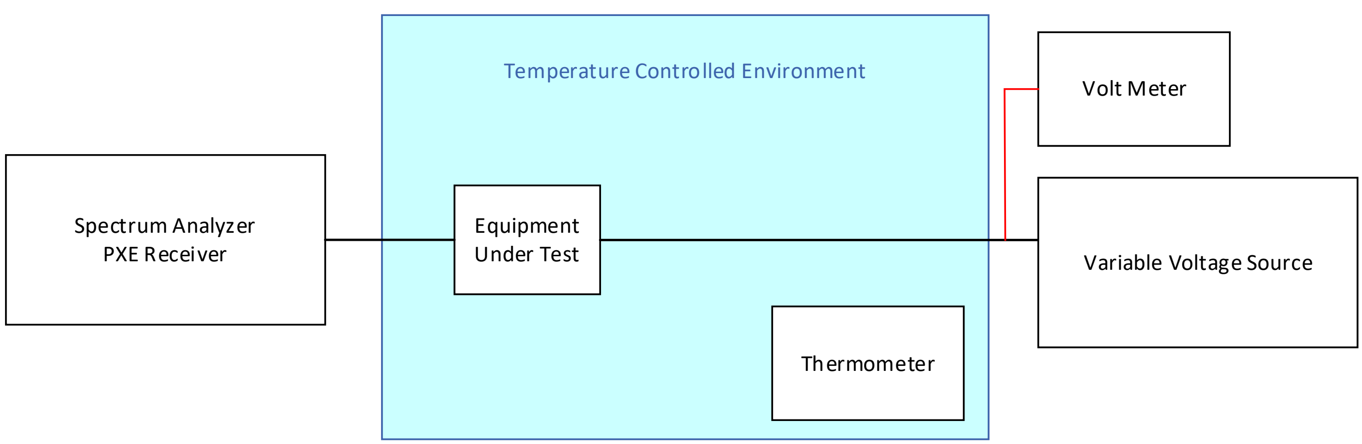

Figure TR27.5: Schematic drawing of the test equipment setup

This line is the end of the test record.

Test Record
Radiated Emission Test RE05
Project GCL0256

Test Date(s)	01 Mar 2024
Test Personnel	David Kerr
Product Model	A04743
Serial Number tested	3453327361
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Input Power	USB 5 Vdc
Test Standards:	FCC Part 15 (as noted in Section 6 of the report).
Frequency Range:	1000 MHz to 2200 MHz
Pass/Fail Judgment:	**PASS**
Test record created by:	**David A Kerr**
Date of this record:	**01 Mar 2024**

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	227596	14-Sep-2023	14-Sep-2025
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-0/0	1	Calibration	Not Required
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025

Table RE05.1: Test Equipment Used

Software Used: Keysight PXE receiver software A.32.06, EPX test software Version 2023.01.001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 180° the ‘front’ reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 1000 MHz and 2.2 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

The other signal were noise floor and were more than 20 dB less than the limit. Hence, they are not measured.

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(µV)		dB(1/m)	dB(µV/m)		dB(µV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2148.250	H	32.7	46.1	-1.2	31.5	44.9	54.0	74.0	22.5	29.1	294.6	165.0

Table RE05.2: Emission summary (2402MHz)

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(µV)		dB(1/m)	dB(µV/m)		dB(µV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2147.500	V	32.6	46.2	-1.2	31.4	45.0	54.0	74.0	22.6	29.0	191.3	46.0

Table RE05.3: Emission summary (2440MHz)

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(µV)		dB(1/m)	dB(µV/m)		dB(µV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2031.250	V	32.6	46.0	-1.5	31.1	44.5	54.0	74.0	22.9	29.5	333.7	229.0

Table RE05.4: Emission summary (2480MHz)

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

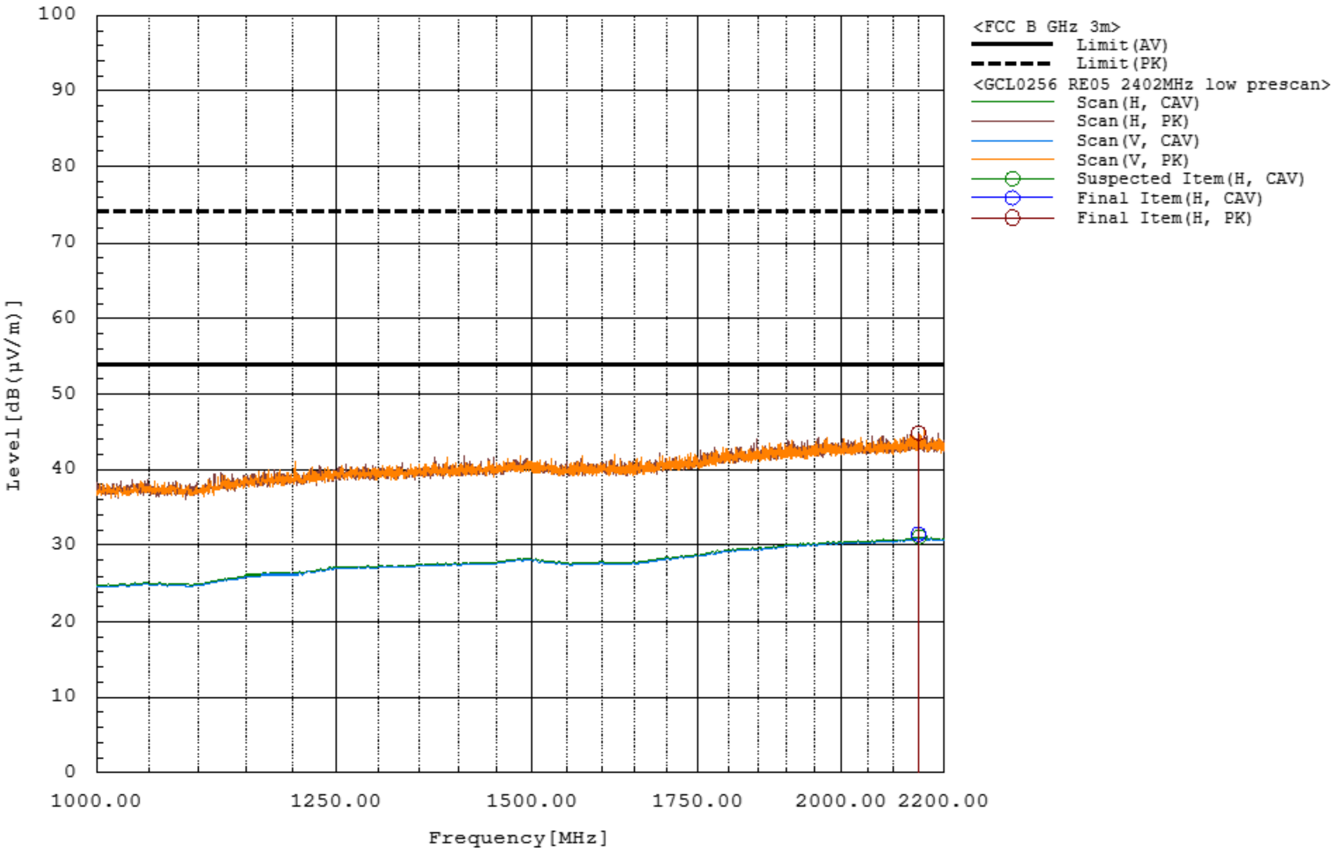

Figure RE05.1: Spectral data (2402MHz)

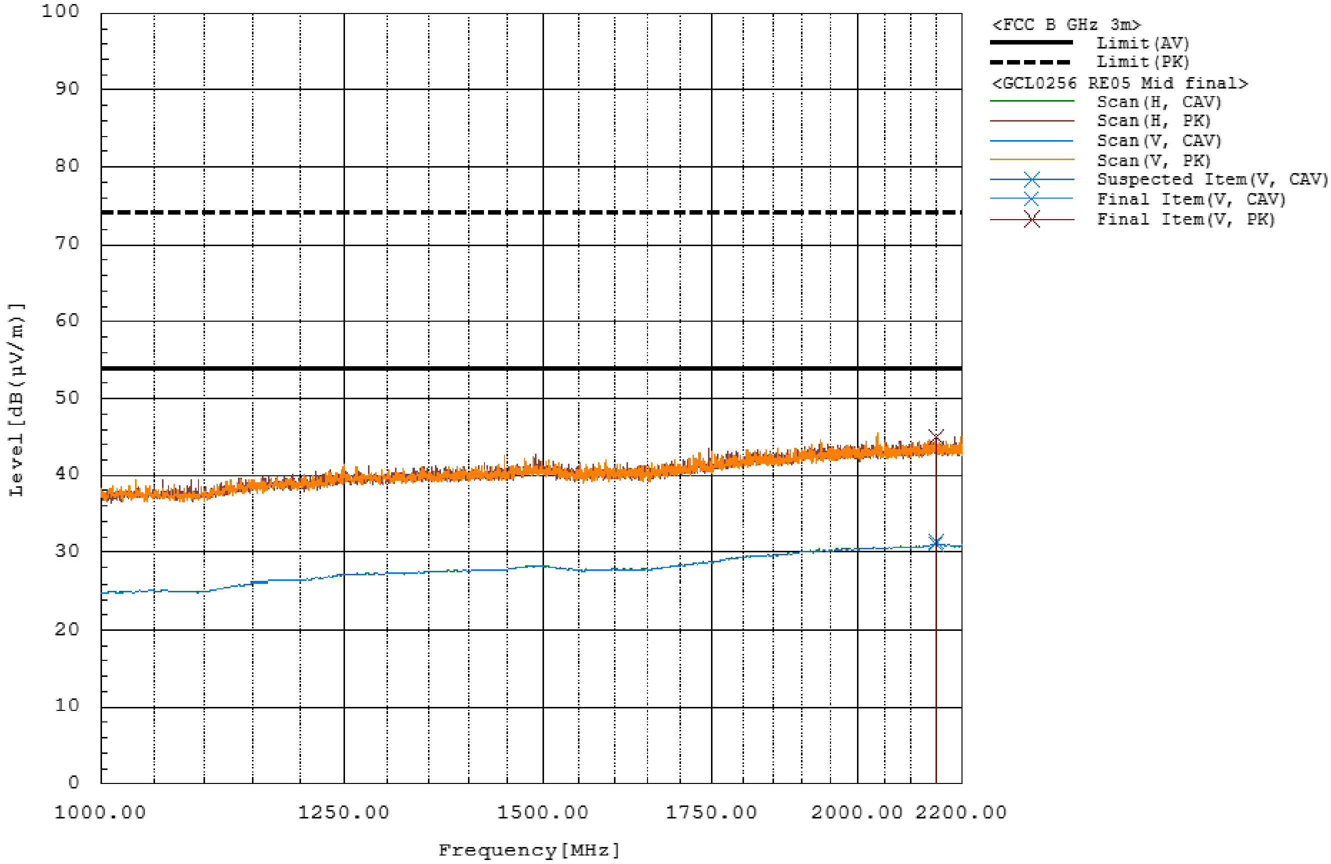

Figure RE05.2: Spectral data (2440MHz)

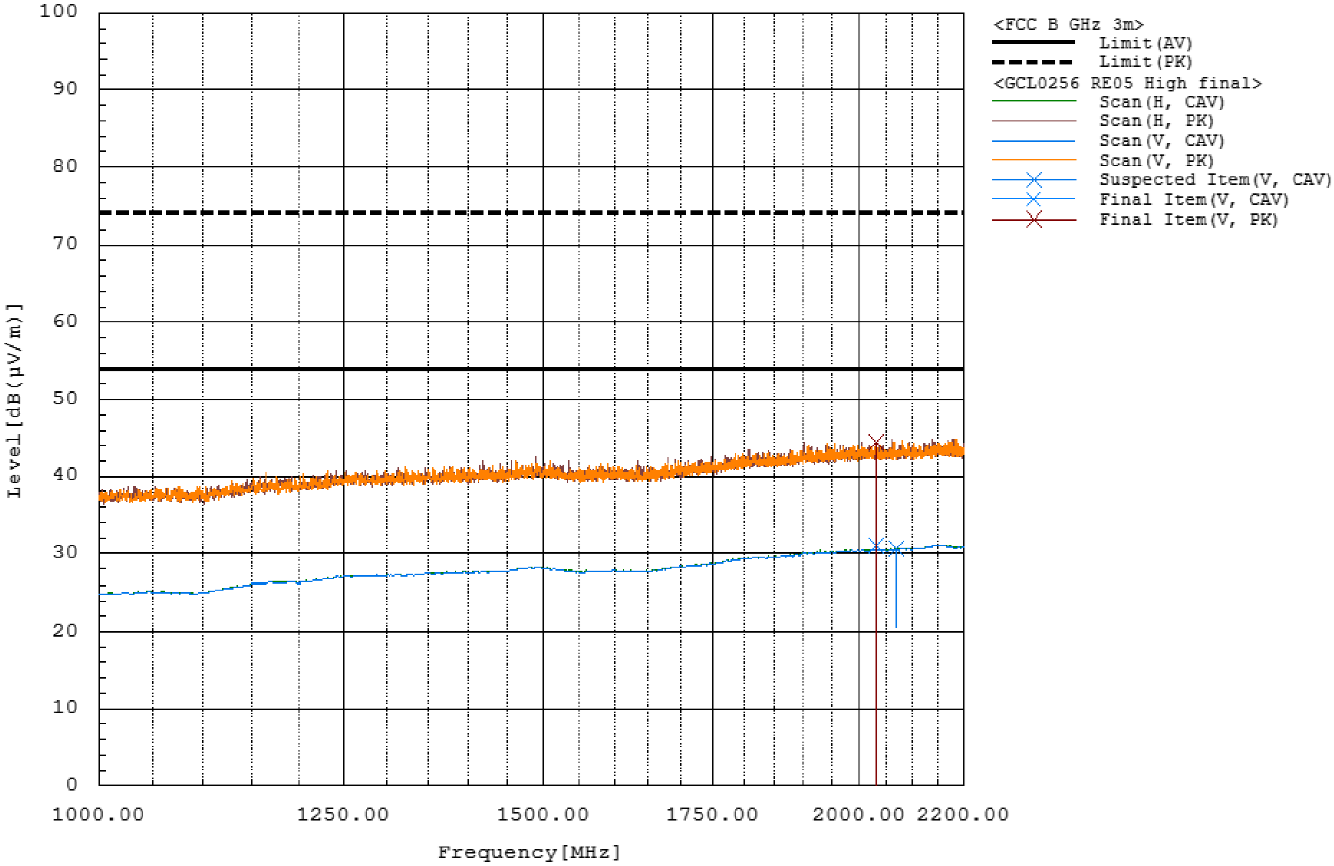

Figure RE05.3: Spectral data (2480MHz)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE05.4: EUT test setup, front view

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE05.5: EUT test setup, reverse view

This line is the end of the test record.

Test Record
Radiated Emission Test RE07
Project GCL0256

Test Date(s) 05 Mar 2024
Test Personnel David Kerr

Product Model A04743
Serial Number tested 3453327361

Operating Mode M1 (BtTx)
Arrangement A2 (USB)
Input Power USB 5 Vdc

Test Standards: FCC Part 15 (as noted in Section 6 of the report).

Frequency Range: 30 MHz to 1000 MHz
Pass/Fail Judgment: PASS

Test record created by: David A Kerr
Date of this record: 05 Mar 2024
Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
Antenna, Biconilog, 30M-6 GHz	ETS Lindgren	3142E	233204	2-Nov-2023	1-Nov-2025
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	7-Nov-2022	7-Nov-2025

Table RE07.1: Test Equipment Used

Software Used: Keysight PXE receiver software A.32.06, EPX test software Version 2023.01.001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 180° the ‘front’ reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 30 MHz and 1 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

The other signal were noise floor and were more than 20 dB less than the limit. Hence, they are not measured.

Frequency	Pol.	Reading	Factor	Level	Limit	Margin	Height	Angle
MHz		dB(µV)	dB(1/m)	dB(µV/m)	dB(µV/m)	dB	cm	deg
		QP		QP	QP	QP		
949.770	V	-0.2	36.6	36.4	46.0	9.6	304.6	329.0
399.990	V	-0.2	27.3	27.1	46.0	18.9	252.0	54.0
266.070	V	0.3	22.4	22.7	46.0	23.3	221.1	350.0
134.940	V	0.7	16.3	17.0	43.5	26.5	350.8	22.0
53.790	V	3.0	14.0	17.0	40.0	23.0	100.0	168.0
45.000	V	2.5	15.3	17.8	40.0	22.2	108.2	25.0

Table RE07.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

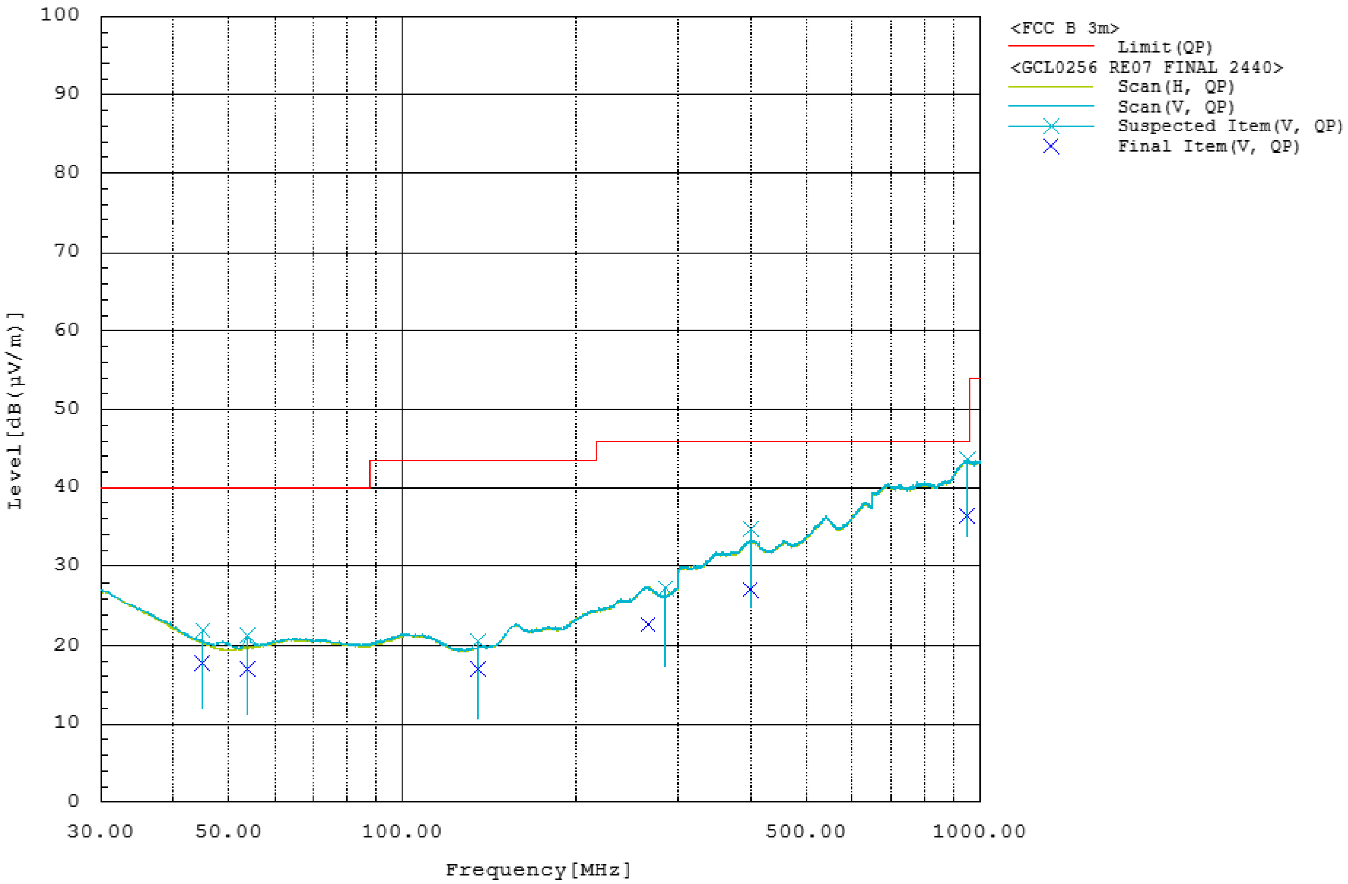

Figure RE07.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

Figure RE07.2: EUT test setup, front view

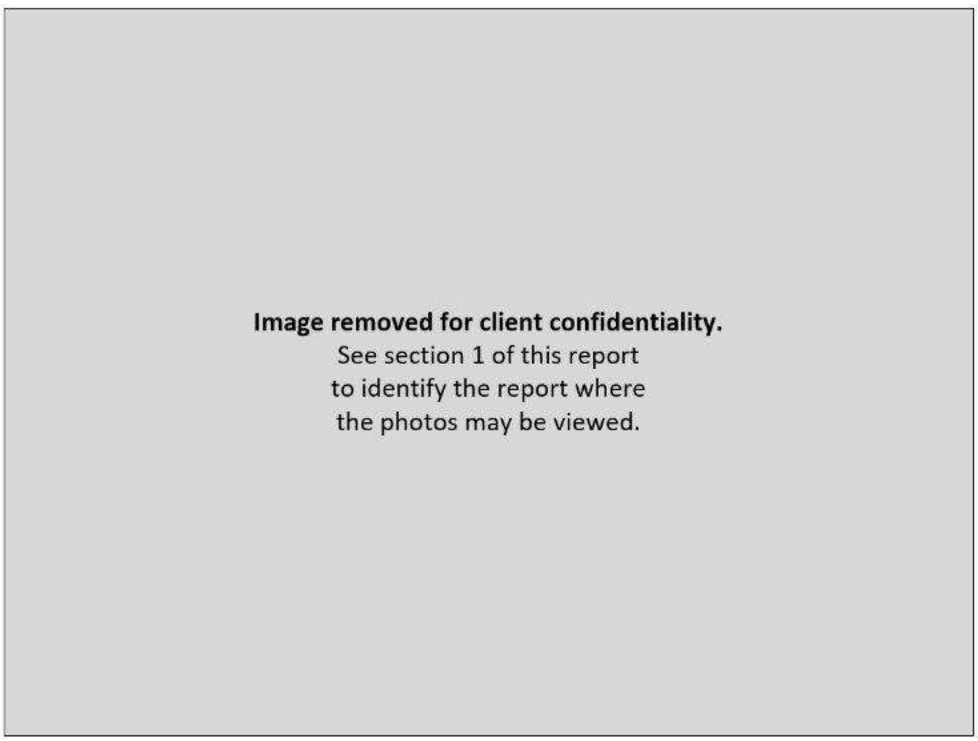

Figure RE07.3: EUT test setup, reverse view

This line is the end of the test record.

Test Record
Conducted Emissions Mains Test CE02
Project GCL0256

Test Date(s)	07 Mar 2024
Test Personnel	Majid Farah and Jim Solum
Product Model	A04743
Serial Number tested	3453327344
Operating Mode	M1 (BtTx)
Arrangement	A2 (USB)
Input Power	120 Vac 60 Hz
Test Standards:	FCC Part 15, ANSI C63.4, ICES-003, ANSI C63.10, RSS-GEN, RSS-210 (as noted in Section 6 of the report).
Frequency Range:	150 kHz to 30 MHz
Pass/Fail Judgment:	**PASS**
Test record created by:	**Majid Farah**
Date of this record:	**08 Mar 2024**

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26.5GHz	Keysight	N9048B	MY63030120	13-Sep-2023	13-Sep-2024
Tape measure, 1” x 33’	Lufkin	PHV1410CMEN	10721	30-Aug-2023	1-Sep-2026
DMM Multimeter	FLUKE	79 III	71740743	5-Apr-2023	1-Apr-2024
LISN multiline; 20A 50uH	Com-Power	LIN-120C	20160005	10-Feb-2023	11-Mar-2024

Table CE02.1: Test Equipment Used

Software Used
Keysight PXE software A.35.06; CE Mains 150k to 30M Data Analysis V2 2021Jun10.xlsx

Test Data

The conducted emission test process began with a set of preliminary scans on both power conductors using both Quasi-Peak and Average detectors across the frequency range. Where the test standard requires cable manipulation, one or more likely worst case frequencies selected by the test personnel. Cables were manipulated to find the maximal signal strength while observing the receiver levels at those selected frequencies. At each of the frequencies selected for final measurements, Quasi-peak and Average detector readings were taken on each conductor.

The table shows the selected final measurement data. It includes at least the six strongest emissions observed relative to the limit lines, along with other data points of interest. The yellow highlight indicate the data points with the least margin to the quasi-peak detector limit and the average detector limit. A positive margin value indicates that the emission was below the test limit. The test limit is the Composite FCC/CISPR Class B Limit.

Frequency (kHz)	QP Limit (dBuV)	AV Limit (dBuV)	L1 QP (dBuV)	L2 QP (dBuV)	L1 AV (dBuV)	L2 AV (dBuV)	QP Margin (dB)	AV Margin (dB)
170	64.95	54.95	39.78	42.80	24.67	28.73	22.14	26.22
204	63.45	53.45	33.46	31.34	24.98	23.91	29.99	28.46
238	62.17	52.17	34.73	30.19	25.22	23.17	27.44	26.96
580	56	46	30.47	29.07	26.46	24.85	25.53	19.54
659	56	46	31.75	27.75	27.03	22.18	24.25	18.97
677	56	46	37.99	32.22	32.54	25.51	18.01	13.46
704	56	46	33.48	29.64	29.3	24.34	22.52	16.70
1327	56.00	46.00	27.82	26.48	22.63	21.33	28.18	23.37
12991	60.00	50.00	27.77	27.37	22.81	22.05	32.23	27.19

Table CE02.2: Emission summary

The graph below shows preliminary scan data as continuous curves. Superimposed are the final measurement data points reported in the table above.

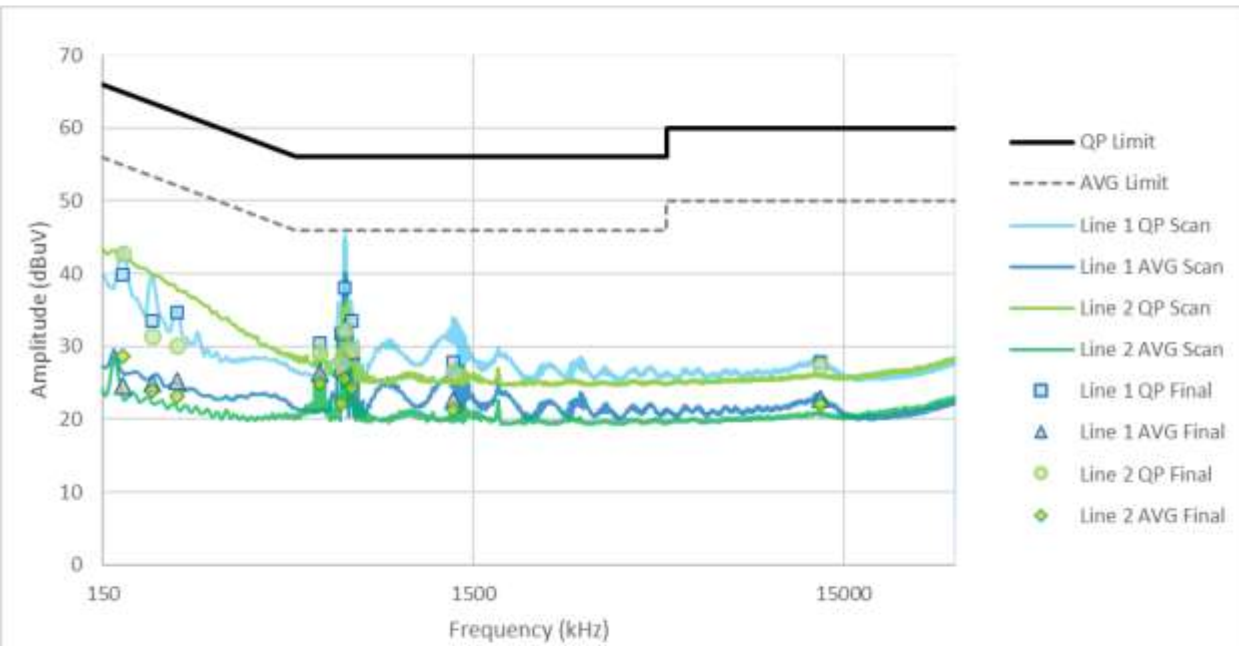

Figure CE02.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure CE02.2: Test setup, front view

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure CE02.3: Test setup, side view

This line is the end of the test record.

Concluding Notes

This report stands as an integrated record of the tests performed and must be copied or distributed in its complete form. The reproduction of selected pages or sections separate from the complete report would require specific approval from the manager of the Garmin Compliance Lab.

This is the final page of the report.