

ROGERS LABS, INC.

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

47CFR, PART 15C - Intentional Radiators 47CFR Paragraph 15.247 and Industry Canada RSS-247 Issue 2 and RSS-GEN Issue 5 Application For Grant of Certification

# Model: AA3851

2402-2480 MHz (DTS) Broadband Digital Transmission System

## FCC ID: IPH-A3851 IC: 1792A-A3851

# Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

FCC Designation: US5305 ISED Registration: 3041A

Test Report Number: 210505

Test Date: May 5, 2021

Authorized Signatory: Scot D. Rogers

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

Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 1 of 64



## **Table of Contents**

TABLE OF CONTENTS		2
REVISIONS		4
EXECUTIVE SUMMARY.		5
<b>OPINION / INTERPRETA</b>	FION OF RESULTS	5
EQUIPMENT TESTED		
Equipment Operational Mod	les	8
Equipment Function		9
Equipment Configuration		10
APPLICATION FOR CER	TIFICATION	11
APPLICABLE STANDAR	DS & TEST PROCEDURES	12
TESTING PROCEDURES		12
AC Line Conducted Emissio	n Test Procedure	
Radiated Emission Test Proc	cedure	12
Antenna Port Conducted En	nission Test Procedure	
Diagram 1 Test arrangement	for Conducted emissions	14
Diagram 2 Test arrangement	for radiated emissions of tabletop equipment	15
•	for radiated emissions tested on Open Area Test Site	
Diagram 4 Test arrangement	for Antenna Port Conducted emissions	
TEST SITE LOCATIONS.		17
UNITS OF MEASUREME	NTS	17
ENVIRONMENTAL CONE	DITIONS	
STATEMENT OF MODIFI	CATIONS AND DEVIATIONS	
INTENTIONAL RADIATO	RS	
Rogers Labs, Inc. 4405 West 259 <sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1	Garmin International, Inc. SN's: Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505	3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 Date: August 18, 2021 Page 2 of 64

Antenna Requirements	18
Restricted Bands of Operation	18
Table 1 Harmonic Radiated Emissions in Restricted Bands Mode 1	19
Table 2 Harmonic Radiated Emissions in Restricted Bands Mode 2	20
Table 3 Harmonic Radiated Emissions in Restricted Bands Mode 3	21
Table 4 Harmonic Radiated Emissions in Restricted Bands Mode 4	22
Summary of Results for Radiated Emissions in Restricted Bands	22
AC Line Conducted EMI Procedure	23
Figure 1 AC Line Conducted emissions of EUT line 1 (EUT – Computer)	24
Figure 2 AC Line Conducted emissions of EUT line 2 (EUT – Computer)	24
Table 5 AC Line Conducted Emissions Data L1 (EUT – Computer)	25
Table 6 AC Line Conducted Emissions Data L2 (EUT – Computer)	25
Summary of Results for AC Line Conducted Emissions Results	26
General Radiated Emissions Procedure	26
Table 7 General Radiated Emissions Data	27
Summary of Results for General Radiated Emissions	27
Operation in the Band 2400 – 2483.5 MHz	
Figure 3 Plot of Transmitter Operation in 2412-2462 MHz Mode 1 802.11b	29
Figure 4 Plot of Transmitter Operation in 2412-2462 MHz Mode 2 802.11g	30
Figure 5 Plot of Transmitter Operation in 2412-2462 MHz Mode 3 802.11n	31
Figure 6 Plot of Transmitter Operation in 2412-2462 MHz Mode 4 802.11n40	32
Figure 7 Plot of Transmitter Emissions Low Band Edge Mode 1 802.11b	33
Figure 8 Plot of Transmitter Emissions Low Band Edge Mode 2 802.11g	34
Figure 9 Plot of Transmitter Emissions Low Band Edge Mode 3 802.11n	35
Figure 10 Plot of Transmitter Emissions Low Band Edge Mode 4 802.11n40	36
Figure 11 Plot of Transmitter Emissions High Band Edge Mode 1 802.11b	37
Figure 12 Plot of Transmitter Emissions High Band Edge Mode 2 802.11g	
Figure 13 Plot of Transmitter Emissions High Band Edge Mode 3 802.11n	
Figure 14 Plot of Transmitter Emissions High Band Edge Mode 4 802.11n40	40
Figure 15 Plot of 6-dB Occupied Bandwidth Mode 1 802.11b	41
Figure 16 Plot of 99% Occupied Bandwidth Mode 1 802.11b	42

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 3 of 64



Figure 17 Plot of 6-dB Occupied Bandwidth Mode 2 802.11g	43
Figure 18 Plot of 99% Occupied Bandwidth Mode 2 802.11g	44
Figure 19 Plot of 6-dB Occupied Bandwidth Mode 3 802.11n	45
Figure 20 Plot of 99% Occupied Bandwidth Mode 3 802.11n	46
Figure 21 Plot of 6-dB Occupied Bandwidth Mode 4 802.11n40	47
Figure 22 Plot of 99% Occupied Bandwidth Mode 4 802.11n40	48
Figure 23 Plot of Transmitter Power Spectral Density Mode 1 802.11b	49
Figure 24 Plot of Transmitter Power Spectral Density Mode 2 802.11g	50
Figure 25 Plot of Transmitter Power Spectral Density Mode 3 802.11n	51
Figure 26 Plot of Transmitter Power Spectral Density Mode 4 802.11n40	52
Transmitter Emissions Data	53
Table 8 Transmitter Radiated Emissions Mode 1 802.11b	53
Table 9 Transmitter Radiated Emissions Mode 2 802.11g	54
Table 10 Transmitter Radiated Emissions Mode 3 802.11n	55
Table 11 Transmitter Radiated Emissions Mode 4 802.11n40	56
Table 12 Transmitter Antenna Port Conducted Data	57
Summary of Results for Transmitter Radiated Emissions of Intentional Radiator	58
ANNEX	
Annex A Measurement Uncertainty Calculations	60
Annex B Test Equipment	61
Annex C Rogers Qualifications	63
Annex D Laboratory Certificate of Accreditation	64

## Revisions

Revision 1 Issued August 18, 2021

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 4 of 64



## **Executive Summary**

The following information is submitted for consideration in obtaining Grant of Certification for License Exempt Digital Transmission System Intentional Radiator operating under Code of Federal Regulations Title 47 (47CFR) Part 15C paragraph 15.247, Industry Canada RSS-247 Issue 2, and RSS-GEN Issue 5, operation in the 2400 – 2483.5 MHz band.

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

M/N: AA3851 FCC ID: IPH-A3851 IC: 1792A-A3851 Frequency Range: operation in the 2412-2462 MHz band

Operational communication modes

Mode	Power at antenna port (Watts)	99% OBW (kHz)	6-dB OBW (kHz)
Mode 1 802.11b (CCK, DSSS)	0.016	13,260.0	7,620.0
Mode 2 802.11g (OFDM)	0.004	17,500.0	16,250.0
Mode 3 802.11n (MCS)	0.004	18,300.0	16,923.1
Mode 4 802.11n40 (MCS)	0.004	36,900.0	35,737.2

## **Opinion / Interpretation of Results**

Tests Performed	Margin (dB)	Results
Emissions 15.205, RSS-GEN, RSS-247	-5.6	Complies
Emissions as per 47CFR 15.207, RSS-GEN 8.8	-14.1	Complies
Radiated Emissions 47 CFR 15.209, RSS-GEN 8.9	-9.6	Complies
Harmonic Emissions per 47CFR 15.247, RSS-247	-1.9	Complies
Power Spectral Density per 47CFR 15.247, RSS-247	-17.8	Complies

Rogers Labs, Inc.Garmin International, Inc.SN4405 West 259th TerraceModel: AA3851Louisburg, KS 66053Test: 210505Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Revision 1File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 5 of 64



Tests performed include

## 47CFR

15.247 (a) (2) Systems using digital modulation techniques may operate in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

(b) The maximum peak conducted output power of the intentional radiator shall not exceed the following:

(3) For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one-Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the *maximum conducted output power* is the highest total transmit power occurring in any mode.

(d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

(e) For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

Rogers Labs, Inc.Q4405 West 259th TerraceMLouisburg, KS 66053MPhone/Fax: (913) 837-3214MRevision 1H

Garmin International, Inc. SN Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 6 of 64



#### 5.2 Digital transmission systems

DTSs include systems that employ digital modulation techniques resulting in spectral characteristics similar to direct sequence systems. The following applies to the bands 902-928 MHz and 2400-2483.5 MHz

a)The minimum 6 dB bandwidth shall be 500 kHz.

b)The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d),(i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

**5.4 Transmitter output power and equivalent isotropically radiated power (e.i.r.p.) requirements** d) For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

#### 5.5 Unwanted emissions

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 5.4(d), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

Rogers Labs, Inc.Garmin International, Inc.SN's: 3364405 West 259th TerraceModel: AA3851FCLouisburg, KS 66053Test: 210505ICPhone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247DaRevision 1File: AA3851 DTS TstRpt 210505Pa

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 7 of 64



Model: AA3851

Garmin International, Inc. 1200 East 151st Street Olathe, KS 66062

Equipment	Model / PN	Serial Number
EUT	AA3851	3367328412
EUT 2	AA3851	3367328413
EUT 3	AA3851	3367328414
USB cable	320-01461-0x	N/A
USB cable	010-11478-02 Acc	N/A
DC Power Supply	BK 1745	209C13
Laptop Computer	Latitude 7490	C1DK6S2
USB Printer	Dell 0N5819	5D1SL61

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

Software: 2.53, Antenna: 2.4 GHz PIFA (6 dBi)

## **Equipment Operational Modes**

Mode	Transmitter Operation
1	802.11b
2	802.11g
3	802.11n
4	802.11n40

Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 8 of 64



## **Equipment Function**

The EUT is a GPS receiver and digital recording system. The GPS provides location information of the device. The unit is designed for mobile placement and use. The design incorporates transmitter circuitry operating in the 2412-2483.5 MHz frequency band providing wireless communications using the 802.11b/g/n/n40 protocols. The design also includes a 1600 MHz Satellite communications module (FCC ID: IPH-03302, IC: 1792A-03302) providing the ability to upload location information through satellite communications channels. As presented below, the design provides cabled interface capabilities for mass communications and wireless communications with compatible equipment. The EUT operates from direct current power provided from replaceable internal batteries or direct current external power. External power may be supplied from 12-volt battery or compliant USB interface as documented. The EUT was arranged as described by the manufacturer emulating typical user configurations for testing purposes. The EUT offers no other interface connections than those presented in configuration options described by the manufacturer. For testing purposes, the EUT received power from both internal and external power options and configurations. During testing, the test system was configured to operate in manufacturer defined modes. As requested by the manufacturer the equipment was tested for emissions compliance using the available configurations with the worsecase data presented. Test results in this report relate only to the products described in this report.

Rogers Labs, Inc.Garm4405 West 259th TerraceModeLouisburg, KS 66053Test:Phone/Fax: (913) 837-3214Test tRevision 1File:

Garmin International, Inc. SN Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

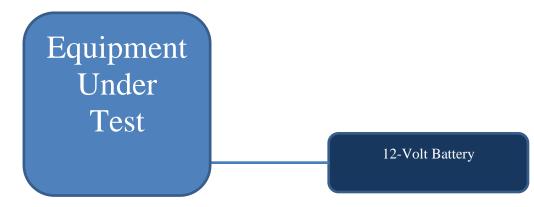
SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 9 of 64



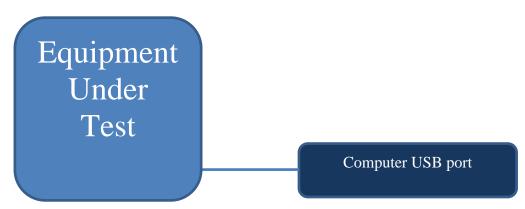
1) EUT operating on internal battery



2) EUT powered from External 12-volt Battery



3) EUT connected to Computer USB port



Rogers Labs, Inc.Gar4405 West 259th TerraceModLouisburg, KS 66053TesPhone/Fax: (913) 837-3214TesRevision 1File

Garmin International, Inc. SN Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 10 of 64



## **Application for Certification**

(1)	Manufacturer:	Garmin International, Inc. 1200 East 151st Street Olathe, KS 66062
(2)	Identification: M/N:	
	FCC ID: IPH-A3851	IC: 1792A-A3851
(3)	Instruction Book:	
	Refer to Exhibit for In	struction Manual.
(4)	Description of Circuit	Functions:
	Refer to Exhibit of Op	perational Description.
(5)	Block Diagram with Frequencies:	
	Refer to Exhibit of O	perational Description.
(6)	Report of Measurements:	
	Report of measurement	nts follows in this Report.
(7)	Photographs: Constru	ction, Component Placement,
	Refer to Exhibit for pl	notographs of equipment.

(8) List of Peripheral Equipment Necessary for operation. The equipment operates from replaceable internal batteries or external direct current power. The EUT provides USB interface port for power and communications as presented in this filing.

etc.:

- (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: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 11 of 64



## **Applicable Standards & Test Procedures**

The following information is submitted in accordance with the eCFR Code of Federal Regulations Title 47 (47CFR), dated May 5, 2021: Part 2, Subpart J, Part 15C Paragraph 15.247, Industry Canada RSS-247 Issue 2, and RSS-GEN Issue 5. Test procedures used are the established Methods of Measurement of Radio-Noise Emissions as described in ANSI C63.10-2013. This report documents compliance of Digital Transmission Systems (DTS) operation.

## **Testing Procedures**

## AC Line Conducted Emission Test Procedure

Testing for the AC line-conducted emissions were performed as required in 47CFR 15C, RSS-247 Issue 2, RSS-GEN and specified in ANSI C63.10-2013. The test setup, including the EUT, was arranged in the test configurations as presented during testing. The test configuration was placed on a 1 x 1.5-meter bench, 0.8 meters high located in a screen room. The power lines of the system were isolated from the power source using a standard LISN with a 50- $\mu$ Hy choke. EMI was coupled to the spectrum analyzer through a 0.1  $\mu$ F capacitor internal to the LISN. The LISN was positioned on the floor beneath the wooden bench supporting the EUT. The power lines and cables were draped over the back edge of the table. Refer to diagram one showing typical test arrangement and photographs in exhibits for EUT placement used during testing.

## Radiated Emission Test Procedure

Radiated emissions testing was performed as required in 47CFR 15C, RSS-247 Issue 2, RSS-GEN and specified in ANSI C63.10-2013. The EUT was placed on a rotating 0.9 x 1.2meter 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.Garmin International, Inc.SN34405 West 259th TerraceModel: AA3851Louisburg, KS 66053Test: 210505Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Revision 1File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 12 of 64



## Antenna Port Conducted Emission Test Procedure

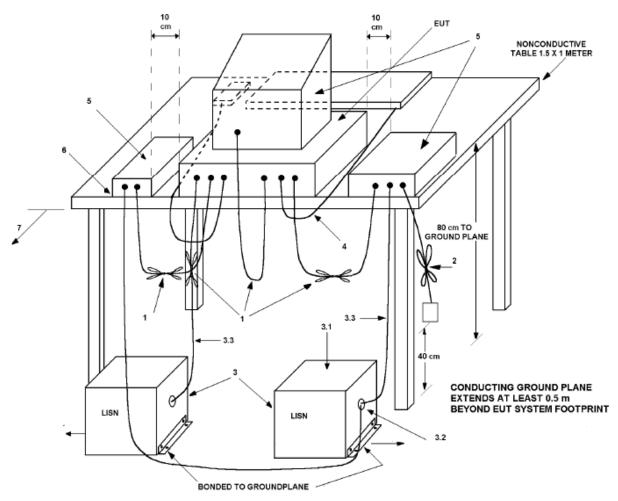
The EUT was assembled as required for operation and placed on a benchtop. This configuration provided the ability to connect test equipment to the provided test antenna port Antenna Port conducted emissions testing was performed as presented in this document and specified in ANSI C63.10-2013. Testing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

Rogers Labs, Inc.Garmin International, Inc.SN's: 334405 West 259th TerraceModel: AA3851HLouisburg, KS 66053Test: 210505IPhone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247IRevision 1File: AA3851 DTS TstRpt 210505H

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 13 of 64



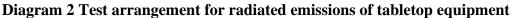
#### **Diagram 1 Test arrangement for Conducted emissions**

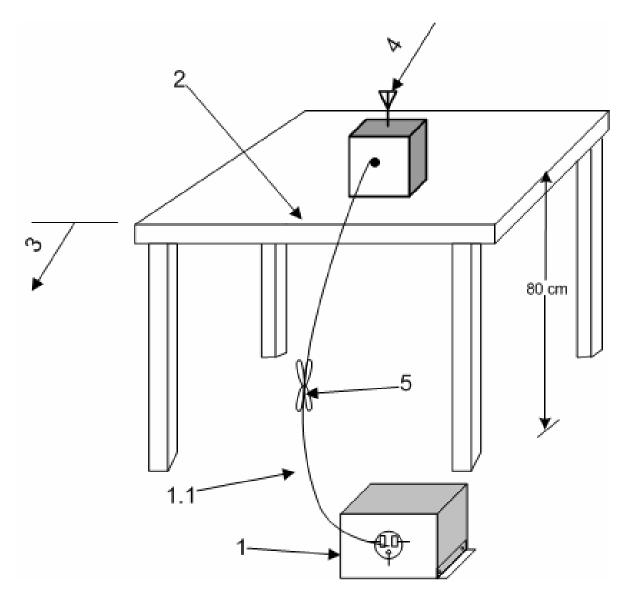


- 1. Interconnecting cables that hang closer than 40 cm to the ground plane were folded back and forth in the center forming a bundle 30 cm to 40 cm long.
- 2. Input/Output (I/O) cables that are not connected to a peripheral shall be bundled in the center. The end of the cable may be terminated, if required, using the correct terminating impedance. The overall length shall not exceed 1 m.
- 3. EUT connected to one LISN. Unused LISN measuring port connectors are terminated into 50  $\Omega$  loads. LISN is placed on top of and bonded to reference ground plane.
- 3.1 All other equipment powered from additional LISN(s).
- 3.2 Multiple outlet strips can be used for multiple power cords of non-EUT equipment.
- 3.3 LISN is positioned at least 80 cm from nearest part of EUT chassis.
- 4. Cables of hand-operated devices, such as keyboards, mice, and so on, shall be placed as for normal use.
- 5. Non-EUT components of EUT system being tested.
- 6. Rear of EUT, including peripherals, shall all be aligned and flush with rear of tabletop.
- 7. Rear of tabletop shall be 40 cm removed from a vertical conducting plane that is bonded to the ground plane (see 5.2.2 for options).

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 14 of 64







1—A LISN is optional for radiated measurements between 30 MHz and 1000 MHz but not allowed for measurements below 30 MHz and above 1000 MHz (see 6.3.1). If used, then connect EUT to one LISN. Unused LISN measuring port connectors shall be terminated in 50  $\Omega$  loads. The LISN may be placed on top of, or immediately beneath, the reference ground plane (see 6.2.2 and 6.2.3.2).

1.1—LISN spaced at least 80 cm from the nearest part of the EUT chassis.

2—Antenna can be integral or detachable, depending on the EUT (see 6.3.1).

3—Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long (see 6.3.1).

4—For emission measurements at or below 1 GHz, the table height shall be 80 cm. For emission measurements above 1 GHz, the table height shall be 1.5 m for measurements, except as otherwise specified (see 6.3.1 and 6.6.3.1).

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 15 of 64



Turntable

Table

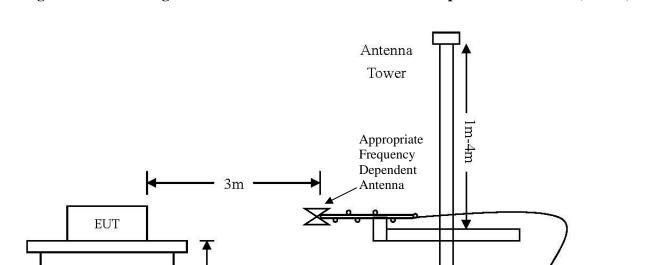
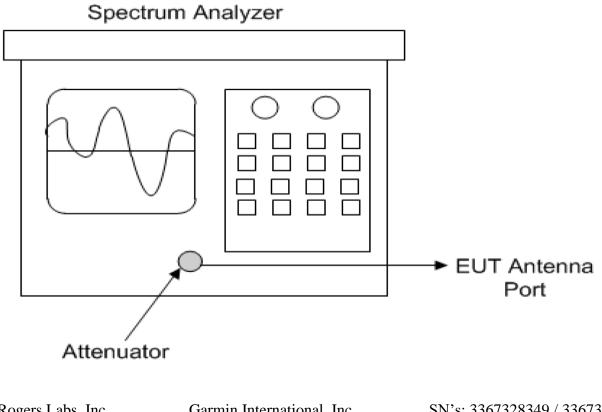


Diagram 3 Test arrangement for radiated emissions tested on Open Area Test Site (OATS)

**Diagram 4 Test arrangement for Antenna Port Conducted emissions** 

0.8 - 1.5 m



Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1 Garmin International, Inc. SN Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 16 of 64

To EMI Receiver

\_\_\_\_\_



## **Test Site Locations**

Conducted EMI		e conducted emissions testing performed in a shielded screen room d at Rogers Labs, Inc., 4405 West 259 <sup>th</sup> Terrace, Louisburg, KS
Antenna port	Anteni	na port conducted emissions testing was performed in a shielded
		room located at Rogers Labs, Inc., 4405 West 259 <sup>th</sup> Terrace, burg, KS
Radiated EMI		diated emissions tests were performed at the 3 meters, Open Area ite (OATS) located at Rogers Labs, Inc., 4405 West 259 <sup>th</sup> Terrace,
		ourg, KS
Registered Site inform	mation:	FCC Site: US5305, ISED: 3041A, CAB Identifier: US0096
NVLAP Accreditatio	n	Lab code 200087-0

## **Units of Measurements**

Conducted EMI	Data presented in	ndBuV∙dB	referenced to	one microvolt
	Data presenteu n	ι uDμ v, uD		

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 and test system losses, and amplifier gains.

Sample Calculation:

$$\begin{split} RFS &= Radiated \ Field \ Strength, FSM = Field \ Strength \ Measured \\ A.F. &= Receive \ antenna \ factor, \ Losses = attenuators/cable \ losses, \ Gain = amplification \ gains \\ RFS \ (dB\mu V/m \ @ \ 3m) = FSM \ (dB\mu V) + A.F. \ (dB/m) + Losses \ (dB) - Gain \ (dB) \end{split}$$

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 17 of 64



## **Environmental Conditions**

Ambient Temperature	26.6° C
Relative Humidity	35 %
Atmospheric Pressure	1019.5 mb

## Statement of Modifications and Deviations

No modifications to the EUT were required for the unit to demonstrate compliance with 47CFR Part 15C, RSS-247 Issue 2, and RSS-GEN Issue 5 emission requirements. There were no deviations to the specifications.

## Intentional Radiators

The following information is submitted in support demonstration of compliance with the requirements of 47CFR, Paragraph 15 Subpart C, paragraph 15.247, Industry Canada RSS-247 Issue 2, and RSS-GEN Issue 5.

## Antenna Requirements

The EUT incorporates integral antenna system and offers no provision for connection to alternate antenna system. The antenna connection point complies with the unique antenna connection requirements. There are no deviations or exceptions to the specification.

## **Restricted Bands of Operation**

Spurious emissions falling in the restricted frequency bands of operation were measured at the OATS. The EUT utilizes frequency, determining circuitry, which generates harmonics falling in the restricted bands. Emissions were investigated at the OATS, using appropriate antennas or pyramidal horns, amplification stages, and a spectrum analyzer. Peak and average amplitudes of frequencies above 1000 MHz were compared to the required limits with worst-case data presented below. Test procedures of ANSI C63.10-2013 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. Garmin International, Inc. 4405 West 259<sup>th</sup> Terrace Model: AA3851 Louisburg, KS 66053 Test: 210505 Phone/Fax: (913) 837-3214 Test to: 47CFR 15C, RSS-Gen RSS-247 **Revision** 1 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 Date: August 18, 2021 Page 18 of 64



Table 1 Harmonic Radiated Emissions in Restricted Bands Mode 1
--

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2390.0	62.0	35.6	62.1	38.9	54.0	-18.4	-15.1
2483.5	61.8	35.3	61.0	35.9	54.0	-18.7	-18.1
4824.0	49.7	35.9	50.9	36.8	54.0	-18.1	-17.2
4874.0	49.1	35.7	49.9	36.2	54.0	-18.3	-17.8
4924.0	49.7	35.8	49.3	35.9	54.0	-18.2	-18.1
7236.0	53.4	40.0	53.4	39.9	54.0	-14.0	-14.1
7311.0	53.1	39.8	53.0	40.0	54.0	-14.2	-14.0
7386.0	53.1	39.9	53.1	40.0	54.0	-14.1	-14.0
12060.0	58.0	44.9	59.3	45.2	54.0	-9.1	-8.8
12185.0	59.5	46.2	59.3	46.5	54.0	-7.8	-7.5
12310.0	60.6	46.6	60.4	46.7	54.0	-7.4	-7.3

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 19 of 64



Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2390.0	62.8	41.1	64.4	42.7	54.0	-12.9	-11.3
2483.5	68.8	44.0	68.5	43.9	54.0	-10.0	-10.1
4824.0	49.1	35.8	49.2	35.9	54.0	-18.2	-18.1
4874.0	49.7	35.7	49.9	35.9	54.0	-18.3	-18.1
4924.0	49.2	36.0	49.5	36.0	54.0	-18.0	-18.0
7236.0	52.5	39.9	53.0	39.8	54.0	-14.1	-14.2
7311.0	52.9	39.9	53.7	39.9	54.0	-14.1	-14.1
7386.0	53.0	40.0	52.7	40.0	54.0	-14.0	-14.0
12060.0	58.4	45.5	58.4	45.4	54.0	-8.5	-8.6
12185.0	59.7	46.4	59.6	46.5	54.0	-7.6	-7.5
12310.0	59.6	46.2	58.7	46.1	54.0	-7.8	-7.9

Rogers Labs, Inc.	,	SN's: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 20 of 64



Table 3 Harmonic Radiated Emissions in Restricted Bands Mode 3	Table 3 Harmonic	Radiated I	Emissions in	Restricted	Bands Mode 3
--	------------------	------------	--------------	------------	--------------

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2390.0	69.1	42.6	68.0	42.5	54.0	-11.4	-11.5
2483.5	69.4	45.1	69.0	44.7	54.0	-8.9	-9.3
4824.0	48.8	35.8	49.3	35.8	54.0	-18.2	-18.2
4874.0	49.0	35.5	49.4	35.7	54.0	-18.5	-18.3
4924.0	49.4	35.9	48.9	35.9	54.0	-18.1	-18.1
7236.0	53.2	39.8	52.8	39.8	54.0	-14.2	-14.2
7311.0	53.9	39.8	53.8	39.9	54.0	-14.2	-14.1
7386.0	52.7	40.0	53.5	40.0	54.0	-14.0	-14.0
12060.0	58.1	45.4	58.5	45.5	54.0	-8.6	-8.5
12185.0	60.7	46.3	59.3	46.5	54.0	-7.7	-7.5
12310.0	59.3	46.1	59.0	46.0	54.0	-7.9	-8.0

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 21 of 64



Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2390.0	70.2	46.4	69.1	45.8	54.0	-7.6	-8.2
2483.5	69.5	48.3	70.2	48.4	54.0	-5.7	-5.6
4844.0	49.1	35.6	49.2	35.7	54.0	-18.4	-18.3
4874.0	49.5	35.5	49.3	35.7	54.0	-18.5	-18.3
4904.0	48.8	35.7	49.4	35.7	54.0	-18.3	-18.3
7266.0	53.5	39.9	52.4	39.9	54.0	-14.1	-14.1
7311.0	53.2	39.7	53.2	39.9	54.0	-14.3	-14.1
7356.0	52.4	39.8	53.4	39.8	54.0	-14.2	-14.2
12110.0	59.1	45.9	58.6	45.9	54.0	-8.1	-8.1
12185.0	59.0	46.3	60.1	46.5	54.0	-7.7	-7.5
12260.0	59.4	45.9	59.0	45.8	54.0	-8.1	-8.2

## Summary of Results for Radiated Emissions in Restricted Bands

The EUT demonstrated compliance with the radiated emissions requirements of 47CFR Paragraph 15, Subpart 15C, RSS-247 Issue 2, and RSS-GEN Issue 5 emission requirements. The EUT worst-case operations demonstrated a minimum radiated emission margin of -5.6 dB below the 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: 3367328349 / 3367328315
4405 West 259th Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 22 of 64



## AC Line Conducted EMI Procedure

The EUT was arranged in the mass Storage mode configuration (#3) for AC Line Conducted emission testing. Testing was performed with the EUT and test configuration 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 AC lineconducted emissions were the procedures of ANSI C63.10-2013 paragraph 6. The AC power adapter of the computer providing power to the EUT was connected to the LISN for AC 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 those providing power to 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 1 and 2 for plots of the EUT – USB Computer interface configuration #3 AC Line conducted emissions.

Trace 1 - QUASI PEAK

Trace 2 – AVERAGE

Meas BW: 9 kHz	Filter Type: CISPR(6dB)	Meas Time: 1 s	Center Freq: 25.87 MHz
Attenuation: 10 dB	Preamp: On	Preselector: On	Filter Split: Off
Notch Filter 1: Off	Notch Filter 2: Off	Input: 2 DC	

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

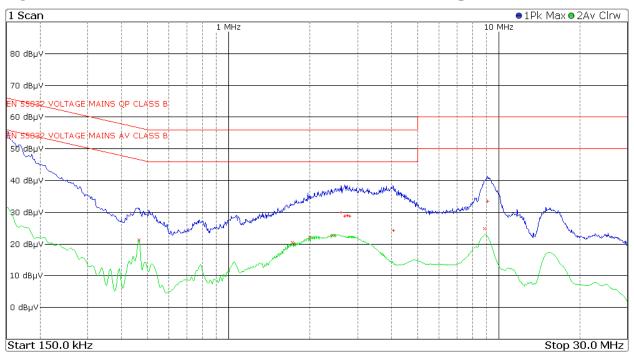
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

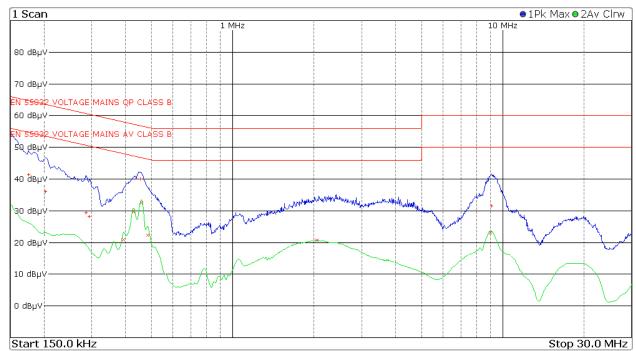
 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 23 of 64





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



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

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

Garmin International, Inc. SN<sup>4</sup> Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 24 of 64



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

Trace	Frequency	Level	Delta Limit
2	2.434 MHz	22.59 dBµV	-23.41 dBµV
2	1.99 MHz	22.06 dBµV	-23.94 dBµV
2	8.871 MHz	24.94 dBµV	-25.06 dBµV
2	465 kHz	21.35 dBµV	-25.25 dBµV
2	1.723 MHz	20.58 dBµV	-25.42 dBµV
2	1.75 MHz	20.01 dBµV	-25.99 dBµV
1	2.609 MHz	29.91 dBµV	-26.09 dBµV
1	9.107 MHz	33.51 dBµV	-26.49 dBµV
1	2.747 MHz	28.88 dBµV	-27.12 dBµV
1	2.692 MHz	28.87 dBµV	-27.13 dBµV
1	2.805 MHz	28.86 dBµV	-27.14 dBµV
1	4.063 MHz	24.23 dBµV	-31.77 dBµV

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

Trace	Frequency	Level	Delta Limit
2	458.3 kHz	32.57 dBµV	-14.15 dBµV
1	453.8 kHz	40 dBµV	-16.81 dBµV
2	429 kHz	29.67 dBµV	-17.6 dBµV
1	174.8 kHz	41.28 dBµV	-23.45 dBµV
2	483 kHz	22.21 dBµV	-24.08 dBµV
2	2.054 MHz	20.62 dBµV	-25.38 dBµV
2	9.002 MHz	22.98 dBµV	-27.02 dBµV
2	393 kHz	20.84 dBµV	-27.16 dBµV
1	201.8 kHz	36.05 dBµV	-27.49 dBµV
1	9.094 MHz	31.56 dBµV	-28.44 dBµV
1	285 kHz	29.28 dBµV	-31.39 dBµV
1	294 kHz	28.28 dBµV	-32.13 dBµV

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

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 25 of 64



## 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 – computer worst-case configuration demonstrated a minimum margin of -14.1 dB below the requirement. Other emissions were present with amplitudes at least 20 dB below the limit and worst-case amplitudes recorded.

## General Radiated Emissions Procedure

The EUT was arranged in a typical equipment configuration and operated through all available mode during testing. Preliminary testing was performed in a screen room with the EUT positioned 1 meter from the FSM. Radiated emissions measurements were performed to identify the frequencies, which produced the highest emissions. Each radiated emission was then maximized at the OATS location before final radiated measurements were performed. Final data was taken with the EUT located on the OATS at 3 meters distance between the EUT and the receiving antenna. The frequency spectrum from 9 kHz to 25,000 MHz was searched for general radiated emissions. Measured emission levels were maximized by EUT placement on the table, rotating the turntable through 360 degrees, varying the antenna height between 1 and 4 meters above the ground plane and changing antenna position between horizontal and vertical polarization. Antennas used were Loop from 9 kHz to 30 MHz, Broadband Biconical from 30 to 200 MHz, Biconilog from 30 to 1000 MHz, Log Periodic from 200 MHz to 1 GHz and or double Ridge or pyramidal horns and mixers above 1 GHz, notch filters and appropriate amplifiers and external mixers were utilized.

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 **Revision** 1

Garmin International, Inc. Model: AA3851 Test: 210505 Phone/Fax: (913) 837-3214 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 Date: August 18, 2021 Page 26 of 64



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 (dB)	Vertical Margin (dB)
155.3	30.3	21.9	25.7	18.2	40.0	-18.1	-21.8
159.6	31.5	20.0	30.2	22.2	40.0	-20.0	-17.8
210.9	31.6	27.5	27.9	23.6	40.0	-12.5	-16.4
215.0	31.2	28.2	30.1	26.8	40.0	-11.8	-13.2
219.1	33.0	30.4	28.3	24.9	40.0	-9.6	-15.1
223.2	33.6	29.3	30.2	26.1	40.0	-10.7	-13.9
236.0	38.0	23.3	30.9	21.2	47.0	-23.7	-25.8

**Table 7 General Radiated Emissions Data** 

## Summary of Results for General Radiated Emissions

The EUT demonstrated compliance with the radiated emissions requirements of 47CFR Paragraph 15.209, RSS-247 Issue 2 and RSS-GEN Issue 5 emission requirements. The EUT demonstrated a minimum margin of -9.6 dB below the requirements. Other emissions were present with amplitudes at least 20 dB below the Limits.

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 3367328349 / 3367328315
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 27 of 64



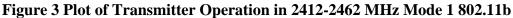
#### Operation in the Band 2400 – 2483.5 MHz

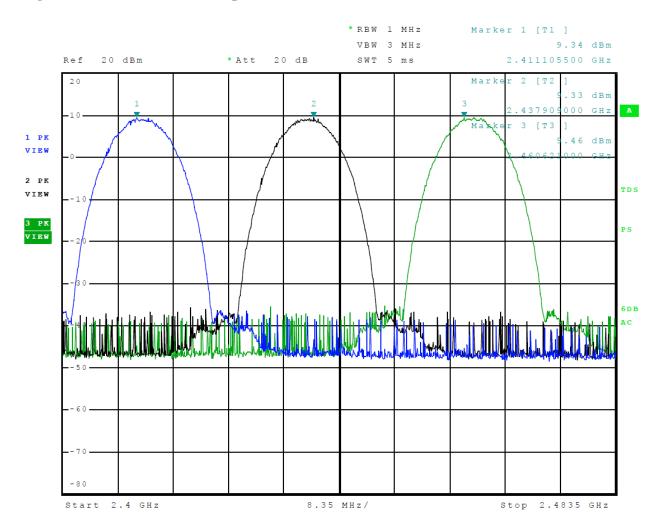
Test procedures of ANSI C63.10-2013 paragraph 6, and KDB 558074 v05r02 were used during transmitter testing. Test sample #2 was provided for testing antenna port conducted emissions. This sample was modified by replacing the internal antenna with a 50-ohm antenna port connector and attenuator for testing purposes. The transmitter peak and average power was measured at the antenna port using a wideband RF power meter as described in ANSI C63.10-2013 and KDB 558074. Average power measured did not include any time intervals during which the transmitter was off or transmitting at a reduced power level. The Power Spectral Density (PSD) was measured as required in ANSI C63.10-2013 and KDB 558074. DTS Emission bandwidth was measured as required in ANSI C63.10-2013 and KDB 558074. The amplitude of each harmonic and general radiated emission was measured on the OATS at distance of 3 meters from the FSM antenna (radiated emission testing was performed on sample #1 representative of production equipment with integral antenna). The EUT was positioned on supporting turntable elevated as required above the ground plane, at a distance of 3 meters from the FSM antenna. Radiated emission investigations were performed from 9 kHz to 25,000 MHz. Each radiated emission was maximized by varying the FSM antenna height and polarization, and by rotating the turntable. The worst-case amplitude of each emission was then recorded from the analyzer display. The peak and quasi-peak amplitude of frequencies below 1000 MHz were measured using a spectrum analyzer. The peak and average amplitude of frequencies above 1000 MHZ were measured using a spectrum analyzer. A Loop antenna was used for measuring emissions from 0.009 to 30 MHz, Biconilog Antenna for 30 to 1000 MHz, Double-Ridge, and/or Pyramidal Horn Antennas from 1 GHz to 25 GHz. Radiated Emissions were measured in dBµV/m @ 3 meters. Plots were taken of transmitter performance (using sample #2) for reference in this and other documentation displaying compliance with the specifications.

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214 Revision 1 Garmin International, Inc. SN Model: AA3851 Test: 210505 Test to: 47CFR 15C, RSS-Gen RSS-247 File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 28 of 64

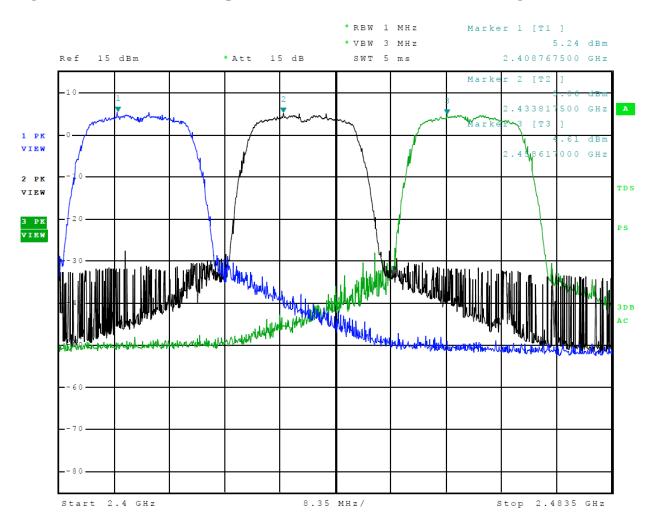






Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 29 of 64





#### Figure 4 Plot of Transmitter Operation in 2412-2462 MHz Mode 2 802.11g

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

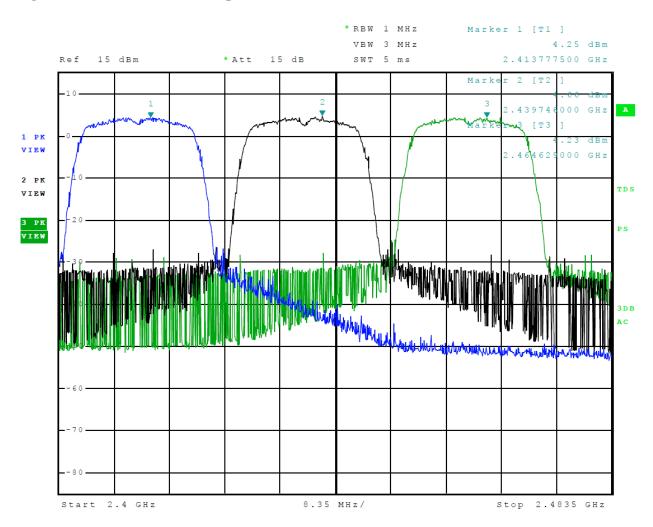
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 30 of 64





#### Figure 5 Plot of Transmitter Operation in 2412-2462 MHz Mode 3 802.11n

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

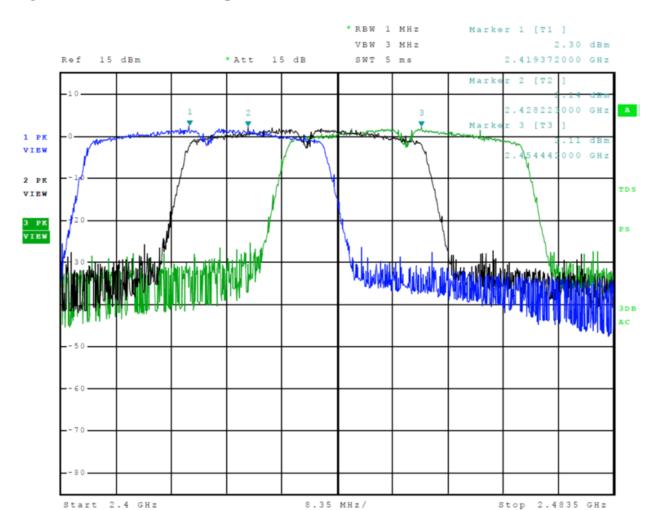
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 31 of 64





#### Figure 6 Plot of Transmitter Operation in 2412-2462 MHz Mode 4 802.11n40

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

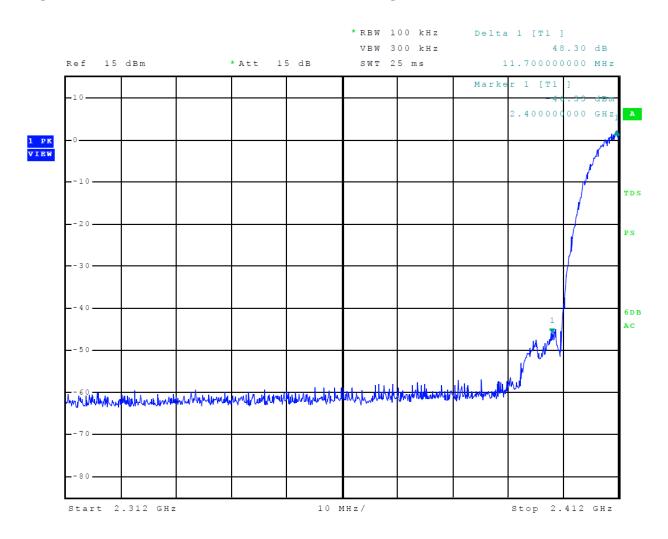
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 32 of 64



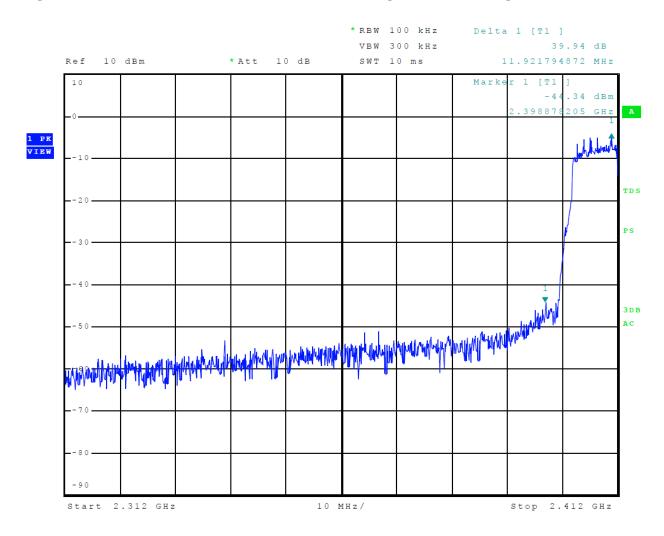
## Figure 7 Plot of Transmitter Emissions Low Band Edge Mode 1 802.11b



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 33 of 64



## Figure 8 Plot of Transmitter Emissions Low Band Edge Mode 2 802.11g



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

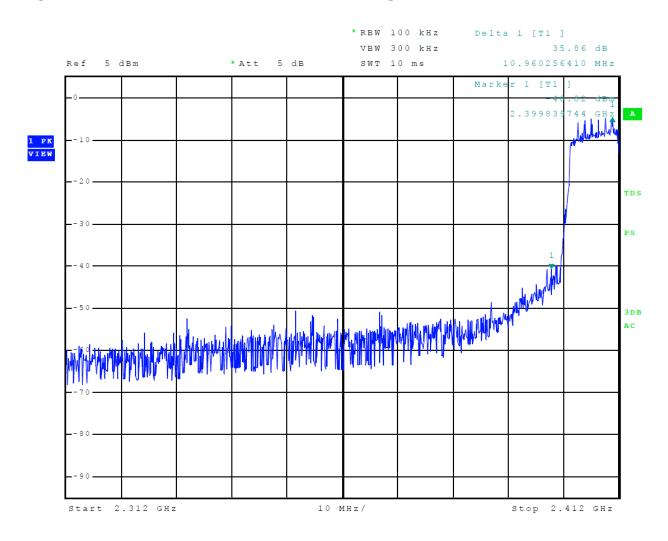
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 34 of 64



## Figure 9 Plot of Transmitter Emissions Low Band Edge Mode 3 802.11n



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

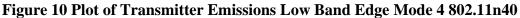
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

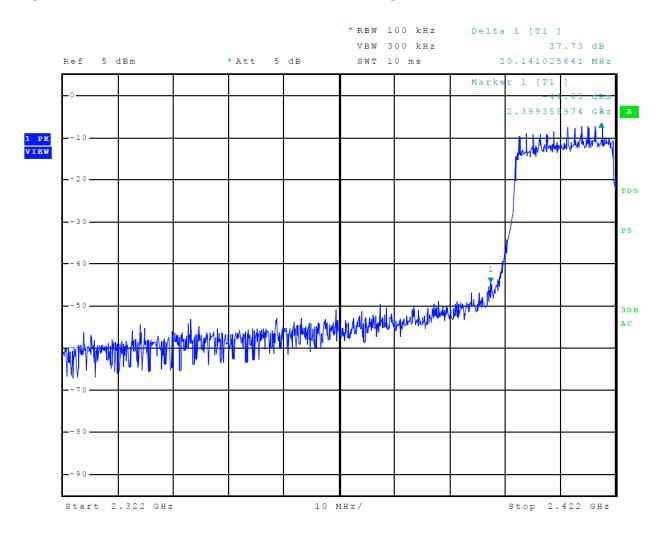
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 35 of 64







 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

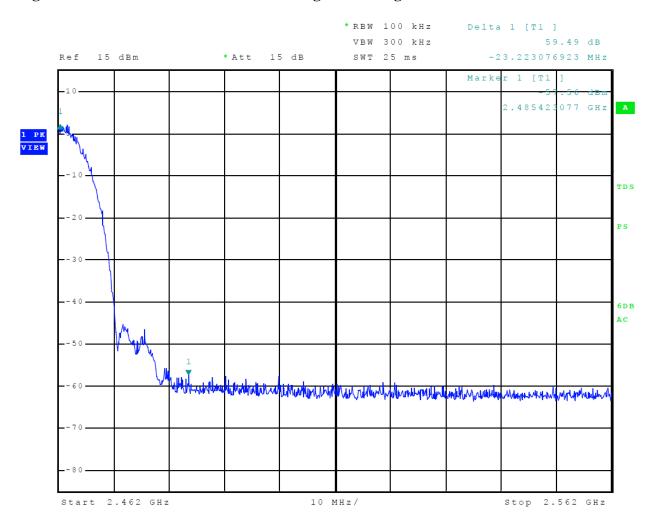
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 36 of 64





### Figure 11 Plot of Transmitter Emissions High Band Edge Mode 1 802.11b

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

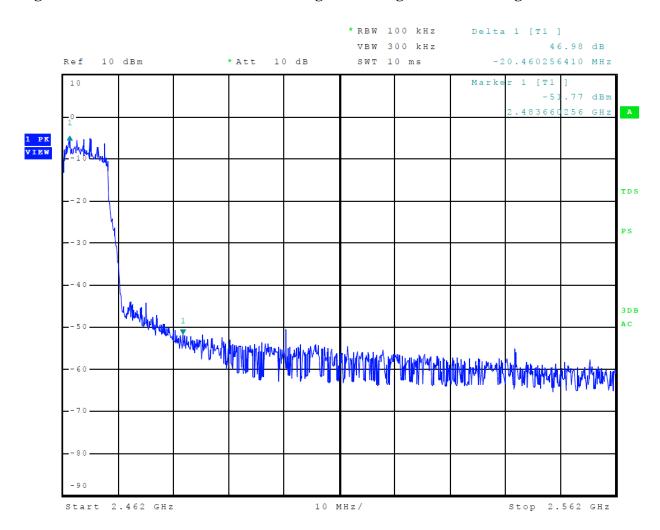
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 37 of 64





## Figure 12 Plot of Transmitter Emissions High Band Edge Mode 2 802.11g

 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

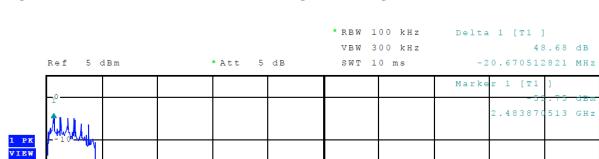
 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

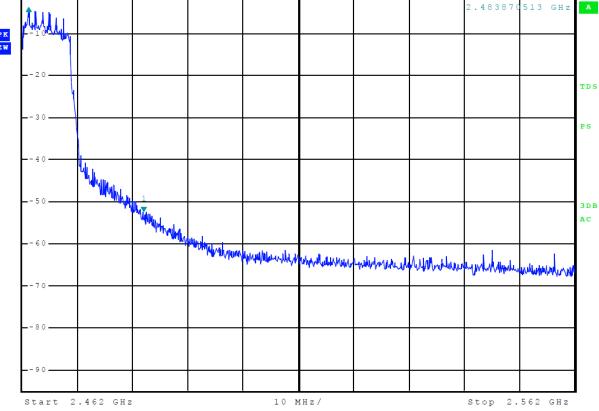
 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 38 of 64



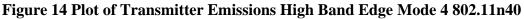


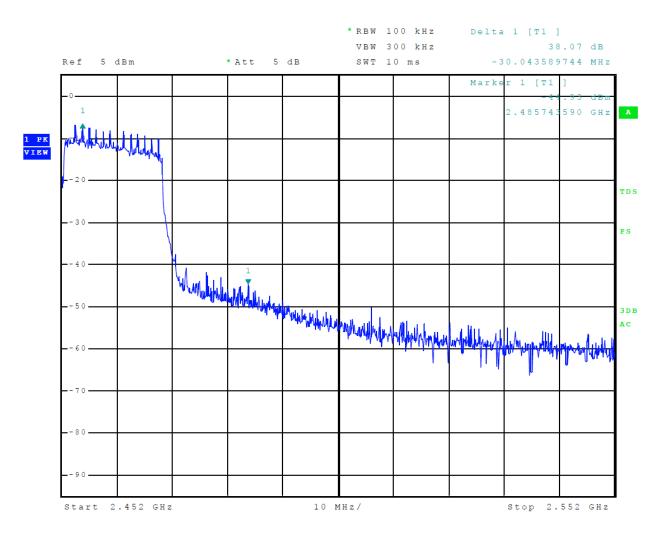
#### Figure 13 Plot of Transmitter Emissions High Band Edge Mode 3 802.11n



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 39 of 64



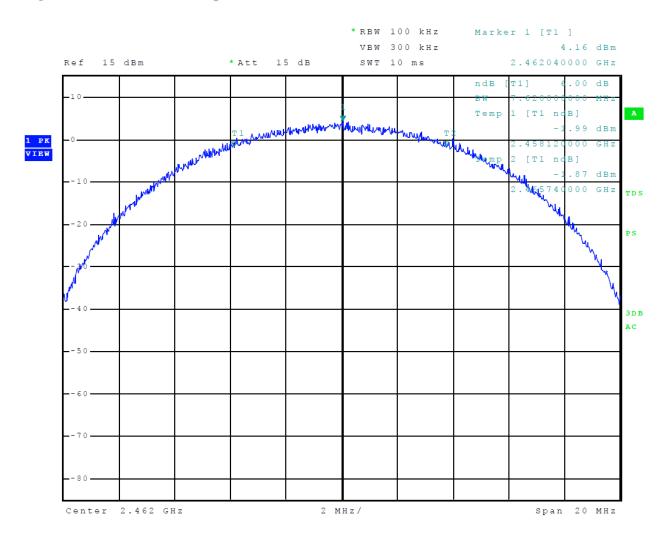




Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 40 of 64



# Figure 15 Plot of 6-dB Occupied Bandwidth Mode 1 802.11b



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

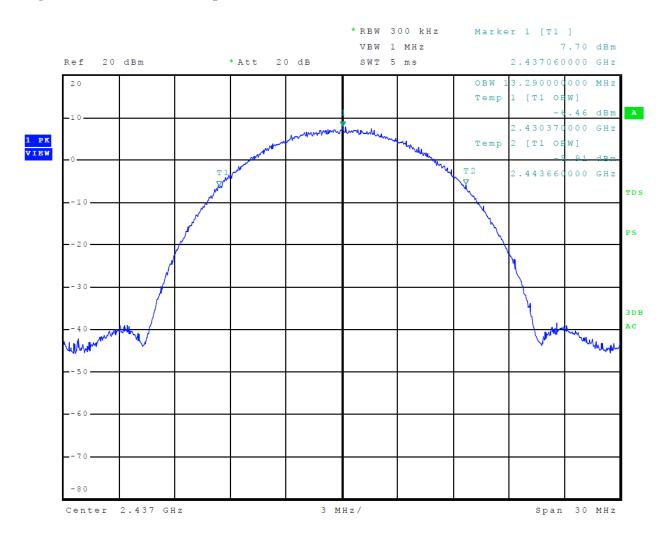
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 41 of 64



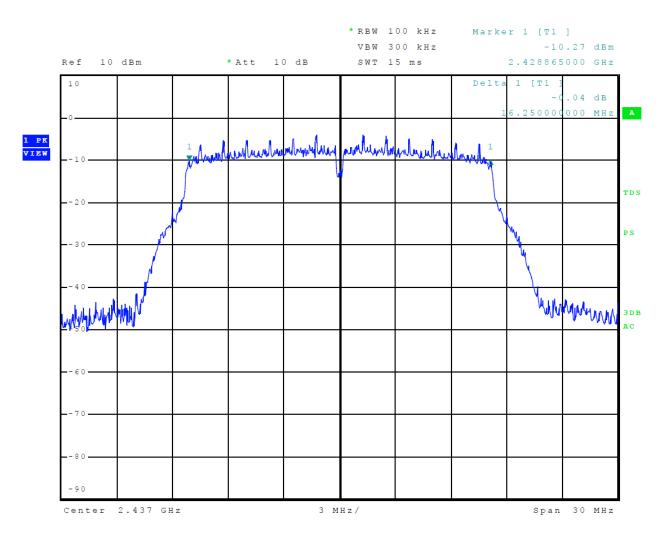
# Figure 16 Plot of 99% Occupied Bandwidth Mode 1 802.11b



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 42 of 64



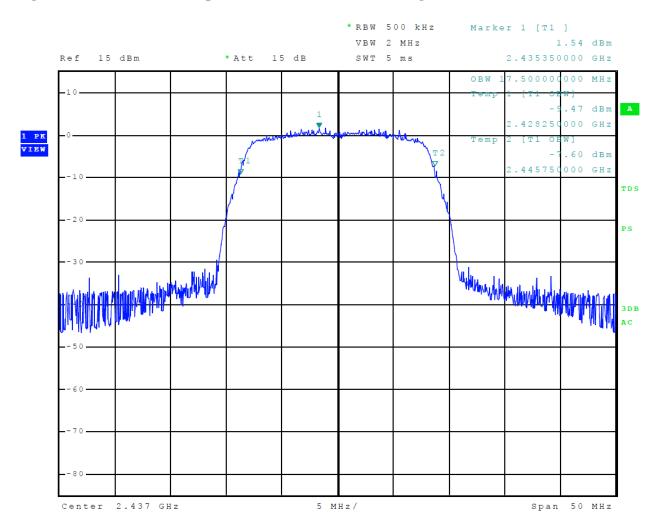
# Figure 17 Plot of 6-dB Occupied Bandwidth Mode 2 802.11g



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 43 of 64



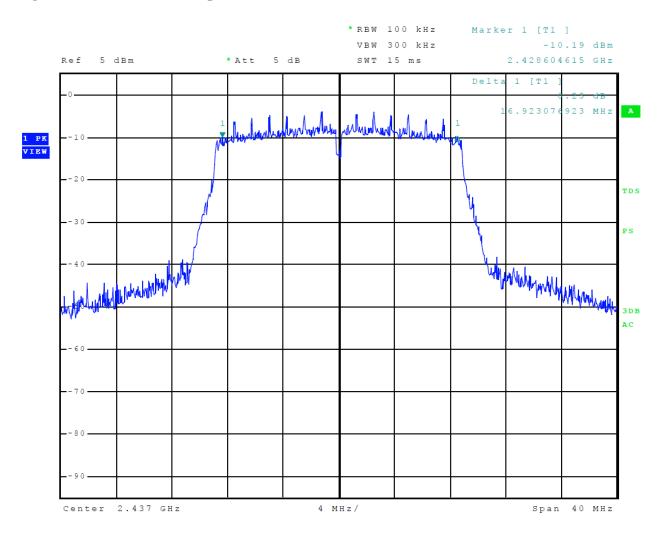
## Figure 18 Plot of 99% Occupied Bandwidth Mode 2 802.11g



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 44 of 64



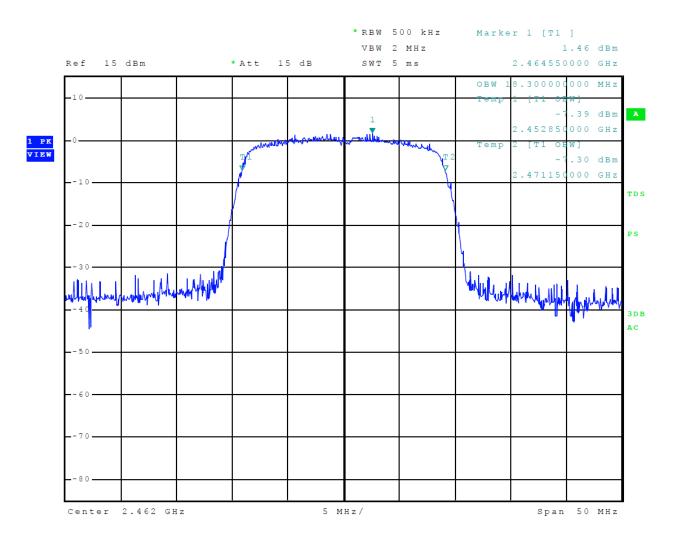
## Figure 19 Plot of 6-dB Occupied Bandwidth Mode 3 802.11n



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 45 of 64



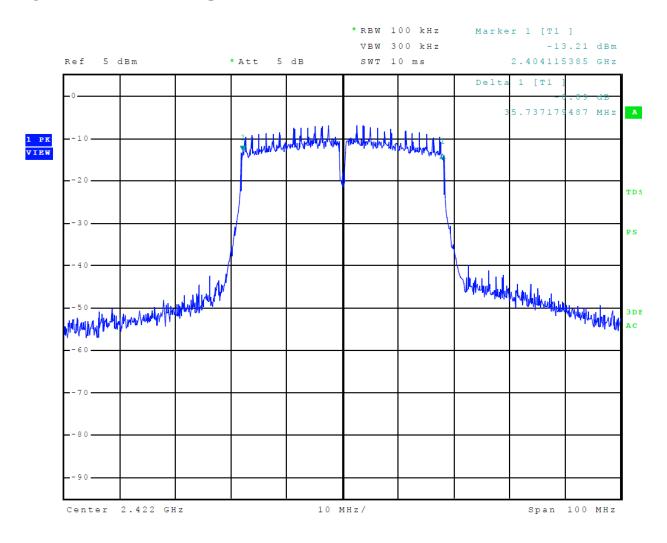
# Figure 20 Plot of 99% Occupied Bandwidth Mode 3 802.11n



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 46 of 64



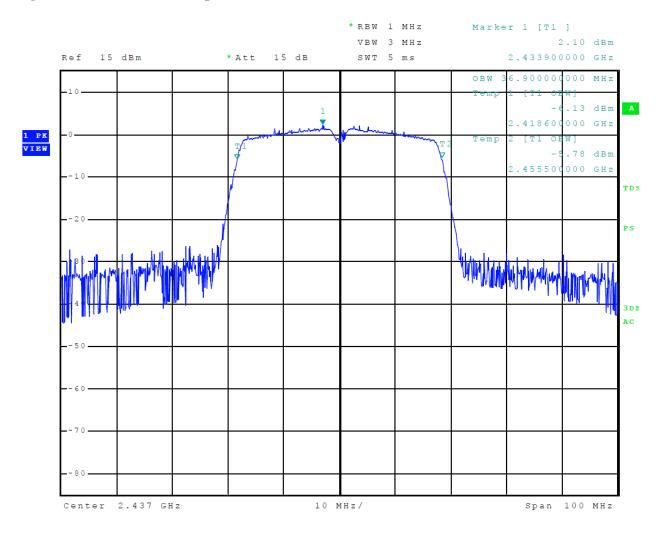
## Figure 21 Plot of 6-dB Occupied Bandwidth Mode 4 802.11n40



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 47 of 64



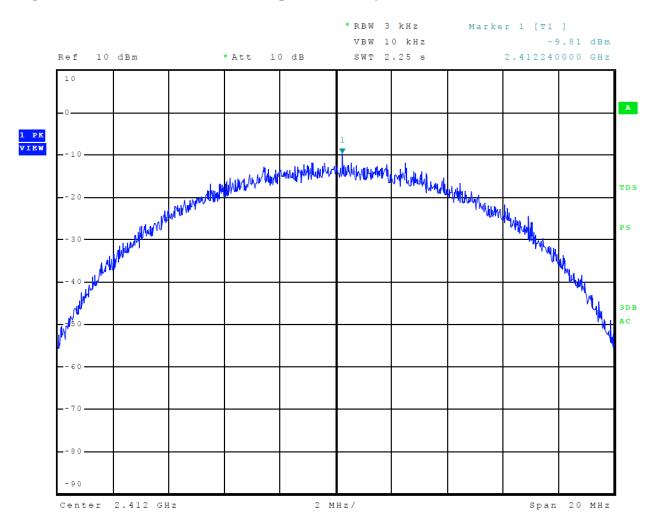
## Figure 22 Plot of 99% Occupied Bandwidth Mode 4 802.11n40



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 48 of 64



## Figure 23 Plot of Transmitter Power Spectral Density Mode 1 802.11b



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

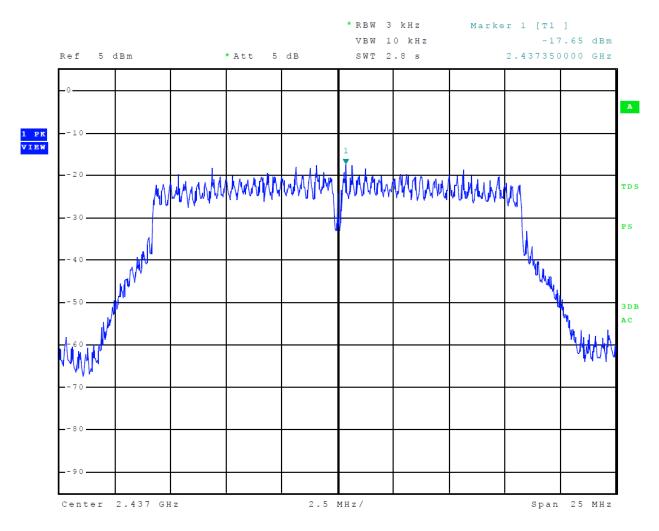
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 49 of 64



## Figure 24 Plot of Transmitter Power Spectral Density Mode 2 802.11g



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

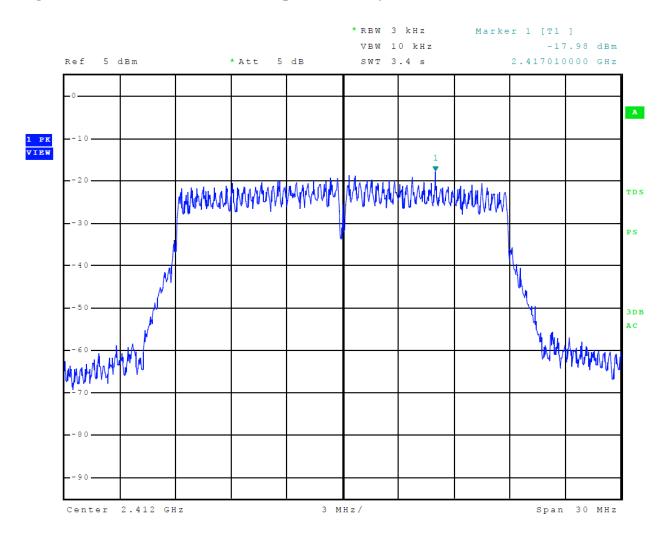
 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 50 of 64



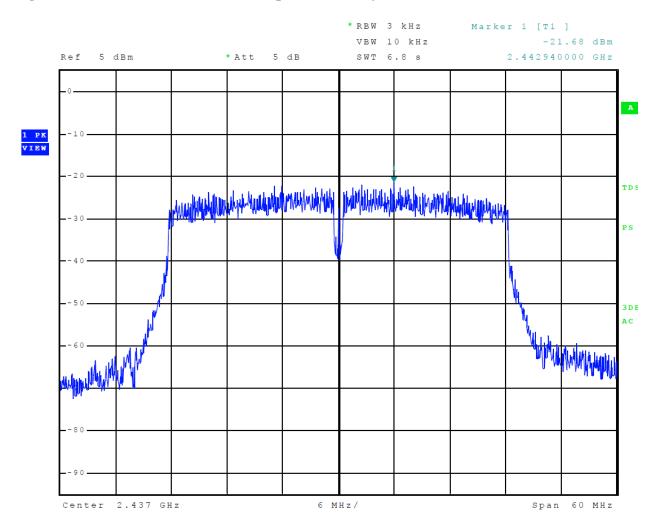
# Figure 25 Plot of Transmitter Power Spectral Density Mode 3 802.11n



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 51 of 64



## Figure 26 Plot of Transmitter Power Spectral Density Mode 4 802.11n40



 Rogers Labs, Inc.
 Garmin International, Inc.
 SN's: 3367328349 / 3367328315

 4405 West 259<sup>th</sup> Terrace
 Model: AA3851
 FCC ID: IPH-A3851

 Louisburg, KS 66053
 Test: 210505
 IC: 1792A-A3851

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247
 Date: August 18, 2021

 Revision 1
 File: AA3851 DTS TstRpt 210505
 Page 52 of 64



# *Transmitter Emissions Data* Table 8 Transmitter Radiated Emissions Mode 1 802.11b

					-		
Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2412.0							
4824.0	49.7	35.9	50.9	36.8	54.0	-18.1	-17.2
7236.0	53.4	40.0	53.4	39.9	54.0	-14.0	-14.1
9648.0	55.3	42.3	56.0	42.5	54.0	-11.7	-11.5
12060.0	58.0	44.9	59.3	45.2	54.0	-9.1	-8.8
14472.0	61.5	47.9	62.0	48.3	54.0	-6.1	-5.7
16884.0	61.9	48.7	62.2	49.1	54.0	-5.3	-4.9
2437.0							
4874.0	49.1	35.7	49.9	36.2	54.0	-18.3	-17.8
7311.0	53.1	39.8	53.0	40.0	54.0	-14.2	-14.0
9748.0	55.6	42.3	55.5	42.4	54.0	-11.7	-11.6
12185.0	59.5	46.2	59.3	46.5	54.0	-7.8	-7.5
14622.0	62.1	48.6	62.4	48.9	54.0	-5.4	-5.1
17059.0	62.8	49.6	63.2	50.0	54.0	-4.4	-4.0
2462.0							
4924.0	49.7	35.8	49.3	35.9	54.0	-18.2	-18.1
7386.0	53.1	39.9	53.1	40.0	54.0	-14.1	-14.0
9848.0	55.9	43.0	56.9	43.1	54.0	-11.0	-10.9
12310.0	60.6	46.6	60.4	46.7	54.0	-7.4	-7.3
14772.0	61.7	48.7	62.3	48.7	54.0	-5.3	-5.3
17234.0	61.4	48.0	61.3	48.1	54.0	-6.0	-5.9

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

Rogers Labs, Inc.Garmin International, Inc.SN4405 West 259th TerraceModel: AA3851Louisburg, KS 66053Test: 210505Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Revision 1File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 53 of 64



#### Table 9 Transmitter Radiated Emissions Mode 2 802.11g

Frequency in MHz	Horizonta l Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2412.0							
4824.0	49.1	35.8	49.2	35.9	54.0	-18.2	-18.1
7236.0	52.5	39.9	53.0	39.8	54.0	-14.1	-14.2
9648.0	55.7	42.8	56.5	42.8	54.0	-11.2	-11.2
12060.0	58.4	45.5	58.4	45.4	54.0	-8.5	-8.6
14472.0	61.8	48.4	61.3	48.3	54.0	-5.6	-5.7
16884.0	63.7	50.0	63.6	50.2	54.0	-4.0	-3.8
2437.0							
4874.0	49.7	35.7	49.9	35.9	54.0	-18.3	-18.1
7311.0	52.9	39.9	53.7	39.9	54.0	-14.1	-14.1
9748.0	55.8	42.5	55.7	42.5	54.0	-11.5	-11.5
12185.0	59.7	46.4	59.6	46.5	54.0	-7.6	-7.5
14622.0	62.2	48.9	62.2	49.0	54.0	-5.1	-5.0
17059.0	62.7	49.7	63.8	49.8	54.0	-4.3	-4.2
2462.0							
4924.0	49.2	36.0	49.5	36.0	54.0	-18.0	-18.0
7386.0	53.0	40.0	52.7	40.0	54.0	-14.0	-14.0
9848.0	55.7	42.8	56.4	42.8	54.0	-11.2	-11.2
12310.0	59.6	46.2	58.7	46.1	54.0	-7.8	-7.9
14772.0	62.5	48.8	62.0	48.8	54.0	-5.2	-5.2
17234.0	61.2	48.1	61.1	48.1	54.0	-5.9	-5.9

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

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 33673
4405 West 259th Terrace	Model: AA3851	FCC
Louisburg, KS 66053	Test: 210505	IC: 1
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	47 Date
Revision 1	File: AA3851 DTS TstRpt 210505	Page

SN's: 3367328349 / 3367328315
FCC ID: IPH-A3851
IC: 1792A-A3851
47 Date: August 18, 2021
Page 54 of 64



#### Table 10 Transmitter Radiated Emissions Mode 3 802.11n

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2412.0							
4824.0	48.8	35.8	49.3	35.8	54.0	-18.2	-18.2
7236.0	53.2	39.8	52.8	39.8	54.0	-14.2	-14.2
9648.0	56.3	42.8	55.7	42.8	54.0	-11.2	-11.2
12060.0	58.1	45.4	58.5	45.5	54.0	-8.6	-8.5
14472.0	61.5	48.3	61.1	48.5	54.0	-5.7	-5.5
16884.0	63.3	50.2	63.2	50.2	54.0	-3.8	-3.8
2437.0							
4874.0	49.0	35.5	49.4	35.7	54.0	-18.5	-18.3
7311.0	53.9	39.8	53.8	39.9	54.0	-14.2	-14.1
9748.0	56.1	42.6	56.0	42.6	54.0	-11.4	-11.4
12185.0	60.7	46.3	59.3	46.5	54.0	-7.7	-7.5
14622.0	62.5	48.9	62.2	49.1	54.0	-5.1	-4.9
17059.0	62.8	49.7	63.0	49.9	54.0	-4.3	-4.1
2462.0							
4924.0	49.4	35.9	48.9	35.9	54.0	-18.1	-18.1
7386.0	52.7	40.0	53.5	40.0	54.0	-14.0	-14.0
9848.0	56.4	42.8	55.8	42.7	54.0	-11.2	-11.3
12310.0	59.3	46.1	59.0	46.0	54.0	-7.9	-8.0
14772.0	62.3	48.7	62.5	48.8	54.0	-5.3	-5.2
17234.0	61.5	47.7	61.6	48.0	54.0	-6.3	-6.0

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

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 33673
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC
Louisburg, KS 66053	Test: 210505	IC: 1
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-2	47 Date
Revision 1	File: AA3851 DTS TstRpt 210505	Page

SN's: 3367328349 / 3367328315
FCC ID: IPH-A3851
IC: 1792A-A3851
47 Date: August 18, 2021
Page 55 of 64



### Table 11 Transmitter Radiated Emissions Mode 4 802.11n40

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2422.0							
4844.0	49.1	35.6	49.2	35.7	54.0	-18.4	-18.3
7266.0	53.5	39.9	52.4	39.9	54.0	-14.1	-14.1
9688.0	55.8	42.9	56.2	42.8	54.0	-11.1	-11.2
12110.0	59.1	45.9	58.6	45.9	54.0	-8.1	-8.1
14532.0	62.2	49.0	61.7	49.0	54.0	-5.0	-5.0
16954.0	65.4	52.1	65.1	52.1	54.0	-1.9	-1.9
2437.0							
4874.0	49.5	35.5	49.3	35.7	54.0	-18.5	-18.3
7311.0	53.2	39.7	53.2	39.9	54.0	-14.3	-14.1
9748.0	55.9	42.4	55.4	42.6	54.0	-11.6	-11.4
12185.0	59.0	46.3	60.1	46.5	54.0	-7.7	-7.5
14622.0	62.4	48.8	62.6	49.1	54.0	-5.2	-4.9
17059.0	65.1	51.6	65.0	51.9	54.0	-2.4	-2.1
2452.0							
4904.0	48.8	35.7	49.4	35.7	54.0	-18.3	-18.3
7356.0	52.4	39.8	53.4	39.8	54.0	-14.2	-14.2
9808.0	54.7	42.1	55.1	42.0	54.0	-11.9	-12.0
12260.0	59.4	45.9	59.0	45.8	54.0	-8.1	-8.2
14712.0	62.1	48.8	61.8	48.8	54.0	-5.2	-5.2
17164.0	63.9	50.5	63.2	50.5	54.0	-3.5	-3.5

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

Rogers Labs, Inc.	Garmin International, Inc.	SN's: 33673
4405 West 259th Terrace	Model: AA3851	FCC
Louisburg, KS 66053	Test: 210505	IC: 1
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-24	47 Date
Revision 1	File: AA3851 DTS TstRpt 210505	Page

SN's: 3367328349 / 3367328315
FCC ID: IPH-A3851
IC: 1792A-A3851
47 Date: August 18, 2021
Page 56 of 64



## Table 12 Transmitter Antenna Port Conducted Data

Frequency MHz	Antenna Port Average Output Power (Watts)	99% Occupied Bandwidth (kHz)	6-dB Occupied Bandwidth (kHz)	Peak Power Spectral Density (dBm)	
	Mode	e 1 802.11b			
2412	0.014	13,260.0	7,480.0	-9.8	
2437	0.015	13,290.0	7,420.0	-10.7	
2462	0.016	13,260.0	7,620.0	-10.9	
	Mode	e 2 802.11g			
2412	0.004	17,450.0	15,871.3	-18.3	
2437	0.004	17,500.0	16,250.0	-17.7	
2462	0.004	17,500.0	16,009.6	-17.8	
	Mode 3 802.11n				
2412	0.004	18,250.0	15,641.0	-18.0	
2437	0.004	18,250.0	16,923.1	-18.1	
2462	0.004	18,300.0	15,384.6	-18.9	
	Mode 4 802.11n40				
2422	0.004	36,800.0	35,737.2	-21.7	
2437	0.004	36,900.0	35,576.9	-21.7	
2452	0.004	36,800.0	34,416.7	-21.0	

Rogers Labs, Inc.Garmin International, Inc.SN4405 West 259th TerraceModel: AA3851Louisburg, KS 66053Test: 210505Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Revision 1File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 57 of 64



# Summary of Results for Transmitter Radiated Emissions of Intentional Radiator

The EUT demonstrated compliance with the radiated and conducted emission requirements of 47CFR Subpart 15C Paragraph 15.247, RSS-247 Issue 2 and RSS-GEN Issue 5 emission requirements for Digital Transmission Systems. Highest average output power measured at the antenna port was 0.016 Watts. The highest peak power spectral density measured at the antenna port presented a minimum margin of -17.8 dB below the requirements. The EUT demonstrated a minimum margin of -1.9 dB below the harmonic emissions requirements. There were no other significantly measurable emissions in the restricted bands other than those recorded in this report. Other emissions were present with amplitudes at least 20 dB below the requirements. There were no other deviations or exceptions to the requirements.

Rogers Labs, Inc.Garmin International, Inc.SN's: 33674405 West 259th TerraceModel: AA3851FCCLouisburg, KS 66053Test: 210505IC: 1Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247DateRevision 1File: AA3851 DTS TstRpt 210505Page

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 58 of 64



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

Rogers Labs, Inc.Garmin International, Inc.SN4405 West 259th TerraceModel: AA3851Louisburg, KS 66053Test: 210505Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Revision 1File: AA3851 DTS TstRpt 210505

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 59 of 64



# 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 <sub>(lab)</sub>
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.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 60 of 64



# Annex B Test Equipment

<u>Equipment</u>	<u>Manufacturer</u>	Model (SN)		al Date(m/d/y	
🖾 LISN		SN-50-25-10(1PA) (160611)	.15-30MHz	4/6/2021	4/6/2022
🖾 LISN	Compliance Design	FCC-LISN-2.Mod.cd,(126)	.15-30MHz	10/14/2020	10/14/2021
⊠ Cable	Huber & Suhner Inc	e. Sucoflex102ea(L10M)(3030	73)9kHz-40 GHz	10/14/2020	10/14/2021
$\Box$ Cable	Huber & Suhner Inc	e. Sucoflex102ea(1.5M)(30306	9)9kHz-40 GHz	10/14/2020	10/14/2021
$\boxtimes$ Cable	Huber & Suhner Inc	e. Sucoflex102ea(1.5M)(30307	0)9kHz-40 GHz	10/14/2020	10/14/2021
$\boxtimes$ Cable	Belden	RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/14/2020	10/14/2021
$\boxtimes$ Cable	Belden	RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/14/2020	10/14/2021
🖾 Antenna	Com Power	AL-130 (121055)	.001-30 MHz	10/14/2020	10/14/2021
$\Box$ 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
$\Box$ Antenna:	Schwarzbeck Mode	l VHBB 9124 (1468)		10/14/2020	10/14/2022
🛛 Antenna	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:	Schwarzbeck Mode	I: VULP 9118 A (VULP 9118	A-534)	10/14/2020	10/14/2022
🛛 Antenna	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
🛛 Antenna	Com Power	AH-840 (101046)	18-40 GHz	4/6/2021	4/6/2023
🛛 Analyzer	Rohde & Schwarz	ESU40 (100108)	20Hz-40GHz	3/2/2021	3/2/2022
Analyzer	Rohde & Schwarz	ESW44 (101534)	20Hz-44GHz	1/12/2021	1/12/2022
$\Box$ Analyzer	Rohde & Schwarz	FS-Z60, 90, 140, and 220	40GHz-220GHz	12/22/2017	12/22/2027
⊠ Amplifier	Com-Power	PA-010 (171003)	100Hz-30MHz	10/14/2020	10/14/2021
⊠ Amplifier	Com-Power	CPPA-102 (01254)	1-1000 MHz	10/14/2020	10/14/2021
$\boxtimes$ Amplifier	Com-Power	PAM-118A (551014)	0.5-18 GHz	10/14/2020	10/14/2021
$\boxtimes$ Amplifier	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		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
□ Attenuator	Mini-Circuits	VAT-3W2+ (1436)	30-6000 MHz	4/6/2021	4/6/2022
$\Box$ Attenuator	Mini-Circuits	VAT-3W2+ (1445)	30-6000 MHz	4/6/2021	4/6/2022
□ Attenuator	Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/6/2021	4/6/2022
$\Box$ Attenuator	Mini-Circuits	VAT-6W2+ (1438)	30-6000 MHz	4/6/2021	4/6/2022
$\Box$ Attenuator	Mini-Circuits	VAT-6W2+ (1736)	30-6000 MHz	4/6/2021	4/6/2022
⊠ Weather sta		6312 (A81120N075)		11/4/2020	11/4/2021
		. ,			
Rogers Labs,		min International, Inc.	SN's: 336	57328349 / 3	3367328315
4405 West 25	9 <sup>th</sup> Terrace Mo	del: AA3851	F	CC ID: IPH-	A3851

 4405 West 259th Terrace
 Model: AA3851

 Louisburg, KS 66053
 Test: 210505

 Phone/Fax: (913) 837-3214
 Test to: 47CFR 15C, RSS-Gen RSS-247

 Revision 1
 File: AA3851 DTS TstRpt 210505

3367328349 / 336732831
 FCC ID: IPH-A3851
 IC: 1792A-A3851
 Date: August 18, 2021
 Page 61 of 64



NVLAP Lab Code 2000 List of Test Equ			Calibration	Date (m/d/y)	Due
□ Antenna:	Schwarzbeck Model	VHBB 9124 (9124-627)		4/21/2020	4/21/2022
□ Antenna:	Schwarzbeck Model	: VULP 9118 A (VULP 911	8 A-534)	4/21/2020	4/21/2022
□ Frequency C	Counter: Leader LDC-	825 (8060153		4/6/2021	4/6/2022
□ LISN: Com-	-Power Model LI-220	A		10/14/2020	10/14/2021
□ LISN: Com-	-Power Model LI-550	С		10/14/2020	10/14/2021
□ ISN: Com-F	Power Model ISN T-8			4/6/2021	4/6/2022
□ LISN: Fisch	er Custom Communi	cations Model: FCC-LISN-5	0-16-2-08	4/6/2021	4/6/2022
□ Cable	Huber & Suhner Inc	. Sucoflex102ea(1.5M)(3030	)72) 9kHz-40 GHz	10/14/2020	10/14/2021
□ Cable	Huber & Suhner Inc	. Sucoflex102ea(L1M)(2811	83) 9kHz-40 GHz	10/14/2020	10/14/2021
$\Box$ Cable	Huber & Suhner Inc	. Sucoflex102ea(L4M)(2811	84) 9kHz-40 GHz	10/14/2020	10/14/2021
□ Cable	Huber & Suhner Inc	. Sucoflex102ea(L10M)(317	546)9kHz-40 GHz	2 10/14/2020	10/14/2021
□ Cable	Time Microwave	4M-750HF290-750 (4M)	9kHz-24 GHz	10/14/2020	10/14/2021
□ RF Filter	Micro-Tronics	BRC17663 (001) 9.3-9.5 no	otch 30-1800 MHz	2 4/6/2021	4/6/2022
□ RF Filter	Micro-Tronics	BRC19565 (001) 9.2-9.6 no	otch 30-1800 MHz	2 10/16/2018	4/6/2022
□ Analyzer	HP	8562A (3051A05950)	9kHz-125GHz	4/6/2021	4/6/2022
□ Analyzer	HP External Mixers	11571, 11970	25GHz-110GHz	2 4/18/2015	4/18/2025
□ Analyzer	HP	8591EM (3628A00871)		4/21/2020	4/21/2022
$\Box$ Wave Form	Generator Keysight	33512B (MY57400128)		4/21/2020	4/6/2022
🗆 Antenna: Se	olar 9229-1 & 9230-1			2/22/2021	2/22/2022
CDN: Com-	Power Model CDN32	25E		10/14/2020	10/14/2021
□ Injection Cl	amp Luthi Model EM	101		10/14/2020	10/14/2021
	e Scope: Tektronix M	IDO 4104		2/22/2021	2/22/2022
EMC Transi	ient Generator HVT T	°R 3000		2/22/2021	2/22/2022
$\Box$ AC Power S	Source (Ametech, Cali	fornia Instruments)		2/22/2021	2/22/2022
□ Field Intens	ity Meter: EFM-018			2/22/2021	2/22/2022
🗆 ESD Simula	ator: MZ-15			2/22/2021	2/22/2022
□ R.F. Power Amp ACS 230-50W not required					
R.F. Power Amp EIN Model: A301     not required				not required	
□ R.F. Power Amp A.R. Model: 10W 1010M7 not required					
□ R.F. Power Amp A.R. Model: 50U1000 not required					
□ Tenney Ten	□ Tenney Temperature Chamber not required				
Shielded Ro	oom			not required	
Rogers Labs	Inc Gar	min International Inc	SN's: 33	67328349 / 3	367328315

Rogers Labs, Inc.Garmin International, Inc.SN's: 3367324405 West 259th TerraceModel: AA3851FCCLouisburg, KS 66053Test: 210505IC: 12Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date:Revision 1File: AA3851 DTS TstRpt 210505Page

SN's: 3367328349 / 3367328315 FCC ID: IPH-A3851 IC: 1792A-A3851 247 Date: August 18, 2021 Page 62 of 64



### 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. 4405 West 259 <sup>th</sup> Terrace		SN's: 3367328349 / 3367328315
4405 West 259 <sup>th</sup> Terrace	Model: AA3851	FCC ID: IPH-A3851
Louisburg, KS 66053	Test: 210505	IC: 1792A-A3851
Phone/Fax: (913) 837-3214	Test to: 47CFR 15C, RSS-Gen RSS-	247 Date: August 18, 2021
Revision 1	File: AA3851 DTS TstRpt 210505	Page 63 of 64



# Annex D Laboratory Certificate of Accreditation



Rogers Labs, Inc.Garmin International, Inc.SN's: 3367328349 / 33673283154405 West 259th TerraceModel: AA3851FCC ID: IPH-A3851Louisburg, KS 66053Test: 210505IC: 1792A-A3851Phone/Fax: (913) 837-3214Test to: 47CFR 15C, RSS-Gen RSS-247Date: August 18, 2021Revision 1File: AA3851 DTS TstRpt 210505Page 64 of 64