

EUT: PKETOUA  
FCC ID: IYZVWTOUA

Date of issue: 2010-07-26



**Test Report**  
**acc. to the relevant standard**  
**47 CFR Part 15 C – Intentional Radiators**  
**Measurement Procedure:**  
**ANSI C63.4-2003**  
**relating to**  
**Marquardt GmbH**  
**PKETOUA**

**Methods of Measurement of Radio-  
Noise Emissions from Low-Voltage  
Electrical and Electronic Equipment  
in the Range 9 kHz to 40 GHz**



EUT: PKETOUA  
 FCC ID: IYZVWTOUA

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<b>Manufacturer's details</b>	
Manufacturer	Marquardt GmbH
Manufacturer's grantee code	<b>IYZ</b>
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	Germany
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Relevant standard used	47 CFR Part 15C - Intentional Radiators
	ANSI C63.4-2003

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<b>Equipment Under Test (EUT)</b>	
Equipment category	Transmitter
Trade name	Marquardt
Type designation	<b>PKETOUA</b>
Serial no.	---
Variants	<b>PKETOUA (Type PKE, Passive entry Key)</b> <b>RKETOUA (Type RKE, Remote Key)</b>

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## 1. Test result summary

CFR Section	Report Chapter	Requirements Headline	Test result		
			Pass	Fail	Not
15.203	11.1	Antenna requirement	Pass	<del>Fail</del>	<del>Not</del>
15.205	11.2	Restricted bands of operation	Pass	<del>Fail</del>	<del>Not</del>
15.209	11.3	Radiated emission limits, general requirements	Pass	<del>Fail</del>	<del>Not</del>
15.231(a)	11.4	Periodic operation characteristics	Pass	<del>Fail</del>	<del>Not</del>
15.231(b)	11.5	Fundamental frequencies / Field strength limits	Pass	<del>Fail</del>	<del>Not</del>
15.231(c)	11.6	Bandwidth (20 dB)	Pass	<del>Fail</del>	<del>Not</del>
15.201 (a) 15.209	11.7	Equipment authorization requirement	Pass	<del>Fail</del>	<del>Not</del>

The equipment meets the requirements	Yes	<del>No</del>
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 Signature  
 Technician

  
 .....  
 Ralf Trepper

 Signature  
 Manager

  
 .....  
 Manfred Dudde

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## 2. Test laboratory

Company name : m.dudde hochfrequenz-technik  
Street : Rottland 5a  
City : 51429 Bergisch Gladbach  
Country : Germany  
Laboratory : FCC Registration Number: 699717  
This site has been fully described in a report submitted to the FCC, and renewed with letter dated July 12, 2005, Registration Number 699717.  
Phone : +49-2207-9689-0  
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Web : http://www.dudde.com

## 3. Introduction

The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of m. dudde hochfrequenz - technik.

This report contains the result of tests performed by m. dudde hochfrequenz - technik for the purpose of a type approval. The order for carrying out these tests has been placed by:

### Manufacturer

Company name : Marquardt GmbH  
Address : Schloß Straße 16  
Postcode : 78604  
City/town : Rietheim Weilheim  
Country : Germany  
Telephone : +49(0)7424 99 1194  
Fax : +49(0)7424 99 2122  
E-Mail : [robert.obergfell@marquardt.de](mailto:robert.obergfell@marquardt.de)  
Date of order : 2009-10-13  
References : Mr. Robert Obergfell

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## 4. Product

Samples of the following apparatus were submitted for testing:

Type of equipment	: Transmitter
Trademark	: Marquardt
Type designation	: PKETOUA
Hardware version	: <b>PKETOUA (Passive entry Key, PKE)</b>
Variant	: RKETOUA (Remote Key, RKE)
Serial number	: --
Software release	: --
Power used	: 3.00 VDC
Frequency used	: 315.000 MHz
Generated or used frequencies	: 9.84375 MHz (crystal), 315.000 MHz (carrier) (RKE- Key) 32.768 kHz (crystal), 9.84375 MHz (crystal), 315.000 MHz (carrier) (PKE- Key)
ITU emission class	: 419KF1D
<b>FCC ID</b>	: <b>IYZVWTOUA</b>

## 5. Test schedule

The tests were carried out in accordance with the specifications detailed in chapter 7 "Summary" of this report at:

- **m. dudde hochfrequenz - technik, D-51429 Bergisch Gladbach**

The test sample was received on:

- **2009-11-27**

The tests were carried out in the following period of time:

- **2009-11-30 - 2010-02-03**

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## 6. Product and measurement documentation

For issuing this report the following product documentation was used and the following annexes were created:

Description	Date	Identifications
External Photographs of the Equipment Under Test	2010-07-26	Annex no. 1
Internal Photographs of the Equipment Under Test	2010-07-26	Annex no. 2
Occupied Bandwidth Plot	2010-02-03	Annex no. 3
Label Sample	2010-07-26	Annex no. 4
Functional Description / User Manual	2010-02-03	Annex no. 5
Test Setup Photographs	2010-07-26	Annex no. 6
Block Diagram	2010-02-03	Annex no. 7
Operational Description	2010-07-26	Annex no. 8
Schematics	2010-02-03	Annex no. 9
Parts List	2010-07-26	Annex no. 10
Periodic Operation Characteristic	2010-02-03	Annex No. 11

The above mentioned documentation will be filed at m. dudde hochfrequenz - technik for a period of 10 years following the issue of this test report.

## 7. Observations and comments

*The only different between the VWTOUA (Passive entry Key, PKE) and the VWTOUA (Remote Key, RKE) is the 3D antenna / 3D receiver. The maximal configuration of the VWTOUA (Passive entry Key, PKE) was tested. (see Annexes schematics, parts lists / layout and block diagram)*

## 8. Summary

The product is intended for the use in the following areas of application:

**Radio-Noise Emissions from Low- Voltage Electrical and Electronic Equipment  
 in the frequency range of 9 kHz to 40 GHz**

The samples were tested according to the following specification:

**47 CFR Part 15 – Intentional Radiators, ANSI C63.4-2003**

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## 9. Conclusions

Samples of the apparatus were found to **CONFORM WITH** the specifications stated in chapter 8 "Summary" of this report.

In the opinion of m. dudde hochfrequenz - technik, the samples satisfied all applicable requirements relating to the network interface types specified in chapter 8.

The results of the type tests as stated in this report are exclusively applicable to the product item as identified in this report. m. dudde hochfrequenz - technik does not accept any responsibility for the results stated in this report, with respect to the properties of product items not involved in these tests.


This report consists of a main module, modules with test results and annexes listed in chapter 6. All pages have been numbered consecutively and bear the m. dudde hochfrequenz - technik logo, the report number and sub-numbers.

The total number of pages in this report is **32**.

### Technical inspector:

Date : 2010-07-26

Name : Ralf Trepper

Signature :   
.....

### Technical responsibility for area of testing:

Date : 2010-07-26

Name : Manfred Dudde

Signature :   
.....



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## 10. Operational description

### 10.1 EUT details

Car lock unlock device, see also technical description Annex No. 5

### 10.2 EUT configuration

The *Transmitter VWTOUA* operated in the continuous transmitting mode after pressing a bottom.

### 10.3 EUT measurement description

The *Transmitter PKETOUA* was tested in a typical fashion. During preliminary emission tests the *Transmitter PKETOUA* was operated in the continuous transmitting mode for worst case emission mode investigation. Both data rates 1.3 kBit/s or 10 kBit/s was tested too. Therefore, the final qualification testing was completed with *Transmitter PKETOUA* operated in continuous modes with the data rate of 1.3 kBit/s. All tests were performed with the applicant's typical voltage: 3.0 V DC

In order to establish the maximum radiation, firstly, there have been viewed all orthogonal adjustments of the test samples, secondly the test ample have been rotated at all adjustments around the own axis between 0° and 360°, and thirdly, the antenna polarization between horizontal and vertical had been varied.

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## 11.1 Antenna requirement

### 11.1.1 Regulation

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with Section 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this Part are not exceeded.

### 11.1.2 Result

The equipment meets the requirements	Yes	<del>No</del>	<del>Nt</del>
Further test results are attached	Yes	<del>No</del>	Annex no. 2

*Antenna is part on the PCB (loop antenna)*

n.a.\* See page no. 31

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## 11.2 Restricted bands of operation

### 11.2.1 Regulation

(a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 - 0.110	16.42 - 16.423	399.9 - 410	4.5 - 5.15
<sup>1</sup> 0.495 - 0.505	16.69475 - 16.69525	608 - 614	5.35 - 5.46
2.1735 - 2.1905	16.80425 - 16.80475	960 - 1240	7.25 - 7.75
4.125 - 4.128	25.5 - 25.67	1300 - 1427	8.025 - 8.5
4.17725 - 4.17775	37.5 - 38.25	1435 - 1626.5	9.0 - 9.2
4.20725 - 4.20775	73 - 74.6	1645.5 - 1646.5	9.3 - 9.5
6.215 - 6.218	74.8 - 75.2	1660 - 1710	10.6 - 12.7
6.26775 - 6.26825	108 - 121.94	1718.8 - 1722.2	13.25 - 13.4
6.31175 - 6.31225	123 - 138	2200 - 2300	14.47 - 14.5
8.291 - 8.294	149.9 - 150.05	2310 - 2390	15.35 - 16.2
8.362 - 8.366	156.52475 - 156.52525	2483.5 - 2500	17.7 - 21.4
8.37625 - 8.38675	156.7 - 156.9	2690 - 2900	22.01 - 23.12
8.41425 - 8.41475	162.0125 - 167.17	3260 - 3267	23.6 - 24.0
12.29 - 12.293	167.72 - 173.2	3332 - 3339	31.2 - 31.8
12.51975 - 12.52025	240 - 285	3345.8 - 3358	36.43 - 36.5
12.57675 - 12.57725	322 - 335.4	3600 - 4400	( <sup>2</sup> )
13.36 - 13.41			

<sup>1</sup> Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz.

<sup>2</sup> Above 38.6

(b) Except as provided in paragraphs (d) and (e), the field strength of emissions appearing within these frequency bands shall not exceed the limits shown in Section 15.209. At frequencies equal to or less than 1000 MHz, compliance with the limits in Section 15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1000 MHz, compliance with the emission limits in Section 15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in Section 15.35 apply to these measurements.

(c) Except as provided in paragraphs (d) and (e), regardless of the field strength limits specified elsewhere in this Subpart, the provisions of this Section apply to emissions from any intentional radiator.

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(d) The following devices are exempt from the requirements of this Section:

- (1) Swept frequency field disturbance sensors operating between 1.705 and 37 MHz provided their emissions only sweep through the bands listed in paragraph (a), the sweep is never stopped with the fundamental emission within the bands listed in paragraph (a), and the fundamental emission is outside of the bands listed in paragraph (a) more than 99% of the time the device is actively transmitting, without compensation for duty cycle.
- (2) Transmitters used to detect buried electronic markers at 101.4 kHz which are employed by telephone companies.
- (3) Cable locating equipment operated pursuant to Section 15.213.
- (4) Any equipment operated under the provisions of § 15.253, § 15.255 or § 15.257 of this part.
- (5) Biomedical telemetry devices operating under the provisions of Section 15.242 of this part are not subject to the restricted band 608-614 MHz but are subject to compliance within the other restricted bands.
- (6) Transmitters operating under the provisions of Subpart D or F of this part.
- (7) Devices operated pursuant to § 15.225 are exempt from complying with this section for the 13.36-13.41 MHz band only.
- (8) Devices operated in the 24.075-24.175 GHz band under § 15.245 are exempt from complying with the requirements of this section for the 48.15-48.35 GHz and 72.225-72.525 GHz bands only, and shall not exceed the limits specified in § 15.245(b).
- (9) Devices operated in the 24.0-24.25 GHz band under § 15.249 are exempt from complying with the requirements of this section for the 48.0-48.5 GHz and 72.0-72.75 GHz bands only, and shall not exceed the limits specified in § 15.249(a).

(e) Harmonic emissions appearing in the restricted bands above 17.7 GHz from field disturbance sensors operating under the provisions of Section 15.245 shall not exceed the limits specified in Section 15.245(b).

(b) Except as provided in paragraphs (d) and (e), the field strength of emissions appearing within these frequency bands shall not exceed the limits shown in Section 15.209. At frequencies equal to or less than 1000 MHz, compliance with the limits in Section 15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1000 MHz, compliance with the emission limits in Section 15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in Section 15.35 apply to these measurements.

(c) Except as provided in paragraphs (d) and (e), regardless of the field strength limits specified elsewhere in this Subpart, the provisions of this Section apply to emissions from any intentional radiator. (d) The following devices are exempt from the requirements of this Section:

- (1) Swept frequency field disturbance sensors operating between 1.705 and 37 MHz provided their emissions only sweep through the bands listed in paragraph (a), the sweep is never stopped with the fundamental emission within the bands listed in paragraph (a), and the fundamental emission is outside of the bands listed in paragraph (a) more than 99% of the time the device is actively transmitting, without compensation for duty cycle.

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- (2) Transmitters used to detect buried electronic markers at 101.4 kHz which are employed by telephone companies.
  - (3) Cable locating equipment operated pursuant to Section 15.213.
  - (4) Any equipment operated under the provisions of § 15.253, § 15.255 or § 15.257 of this part.
  - (5) Biomedical telemetry devices operating under the provisions of Section 15.242 of this part are not subject to the restricted band 608-614 MHz but are subject to compliance within the other restricted bands.
  - (6) Transmitters operating under the provisions of Subpart D or F of this part.
  - (7) Devices operated pursuant to § 15.225 are exempt from complying with this section for the 13.36-13.41 MHz band only.
  - (8) Devices operated in the 24.075-24.175 GHz band under § 15.245 are exempt from complying with the requirements of this section for the 48.15-48.35 GHz and 72.225-72.525 GHz bands only, and shall not exceed the limits specified in § 15.245(b).
  - (9) Devices operated in the 24.0-24.25 GHz band under § 15.249 are exempt from 83 complying with the requirements of this section for the 48.0-48.5 GHz and 72.0-72.75 GHz bands only, and shall not exceed the limits specified in § 15.249(a).
- (e) Harmonic emissions appearing in the restricted bands above 17.7 GHz from field disturbance sensors operating under the provisions of Section 15.245 shall not exceed the limits specified in Section 15.245(b).

**11.2.2 Result**

The equipment meets the requirements	<b>Yes</b>	<del>No</del>	<del>Net</del>
Further test results are attached	<b>Yes</b>	<del>No</del>	Page no. 27

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## 11.3 Radiated emission limits, general requirements

### 11.3.1 Regulation

(a) Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field Strength (microvolts/meter)	Measurement distance (meters)
0.009-0.490	2400/F(kHz)	300
0.490-1.705	24000/F(kHz)	30
1.705-30.0	30	30
30-88	100	3
88-216	150	3
216-960	200	3
Above 960	500	3

(b) In the emission table above, the tighter limit applies at the band edges.

(c) The level of any unwanted emissions from an intentional radiator operating under these general provisions shall not exceed the level of the fundamental emission. For intentional radiators which operate under the provisions of other sections within this part and which are required to reduce their unwanted emissions to the limits specified in this table, the limits in this table are based on the frequency of the unwanted emission and not the fundamental frequency. However, the level of any unwanted emissions shall not exceed the level of the fundamental frequency.

(d) The emission limits shown in the above table are based on measurements employing a CISPR quasi peak detector except for the frequency bands 9-90 kHz, 110-490 kHz and above 1000 MHz. Radiated emission limits in these three bands are based on measurements employing an average detector.

(e) The provisions in §§ 15.31, 15.33, and 15.35 for measuring emissions at distances other than the distances specified in the above table, determining the frequency range over which radiated emissions are to be measured, and limiting peak emissions apply to all devices operated under this part.

(f) In accordance with Section 15.33(a), in some cases the emissions from an intentional radiator must be measured to beyond the tenth harmonic of the highest fundamental frequency designed to be emitted by the intentional radiator because of the incorporation of a digital device. If measurements above the tenth harmonic are so required, the radiated emissions above the tenth harmonic shall comply with the general radiated emission limits applicable to the incorporated digital device, as shown in Section 15.109 and as based on the frequency of the emission being measured, or, except for emissions contained in the restricted frequency bands shown in Section 15.205, the limit on spurious emissions specified for the intentional radiator, whichever is the higher limit. Emissions which must be measured above the tenth harmonic of the highest fundamental frequency designed to be emitted by the intentional radiator and which fall within the restricted bands shall comply with the general radiated emission limits in Section 15.109 that are applicable to the incorporated digital device.

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### 11.3.2 Test equipment

Type	Manufacturer/ Model no.	Serial no.	Last calibration	Next calibration
Receiver (9 kHz –18.0 GHz)	Rohde & Schwarz Spectrum Analyzer FSL 18 (171a)	100.117	2008/10	2010/10
Receiver (9 kHz –40.0 GHz)	Anritsu Spectrum Analyzer MS2668C (359a)	6200163244	2009/04	2011/04
Pre-amplifier (100kHz - 1.3GHz)	Hewlett Packard 8447 E (166a)	1726A00705	2010/01	2012/01
Pre-amplifier (1GHz - 18GHz)	Narda --- (345)	---	2010/01	2012/01
Magnetic loop antenna (9 kHz - 30 MHz)	Schwarzbeck FMZB 1516 (23)	---	2008/09	2010/09
Bilog antenna (30- 1000 MHz)	Schwarzbeck VULP 9168 (406)		2007/02	2013/02
Horn antenna (0.86-8.5 GHz)	Schwarzbeck BBHA 9120 A (284)	236	2009/03	2013/03
Horn antenna (2.0-14.5 GHz)	Schwarzbeck BBHA 9120 C (169)	305	2009/03	2013/03
Horn antenna (14.5-40 GHz)	Schwarzbeck BBHA 9170 (281)	41	2009/03	2013/03
RF- cable	Kabelmetal 18m [N]	K1	2010/01	2011/01
RF- cable	Aircell 0.5m [BNC]	K40	2010/01	2011/01
RF- cable	Aircell 1m [BNC/N]	K56	2010/01	2011/01
RF- cable	Sucoflex 106 Suhner 6,4m [N]	K74	2010/01	2011/01
RF- cable	Sucoflex 106 Suhner 6,4m [N]	K75	2010/01	2011/01

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### 11.3.3 Test procedure

The EUT and this peripheral (when additional equipment exists) are placed on a turn table which is 0.8 m above the ground. The turn table would be allowed to rotate 360 degrees to determine the position of the maximum emission level. The test distance between the EUT and the receiving antenna are 3m. To find the maximum emission, the polarization of the receiving antenna is changed in horizontal and vertical polarization; the position of the EUT was changed in different orthogonal determinations.

ANSI C63.4: 2003 Section 8 “Radiated Emissions Testing”

Measurement procedures for electric field radiated emissions above 1 GHz are covered in Clause 8 of ANSI C63.4-2003. The C63.4-2003 measurement procedure consists of both an exploratory test and a final measurement. The exploratory test is critical to determine the frequency of all significant emissions. For each mode of operation required to be tested, the frequency spectrum is monitored. Variations in antenna height, antenna orientation, antenna polarization, EUT azimuth, and cable or wire placement is explored to produce the emission that has the highest amplitude relative to the limit.

The final measurements are made based on the findings in the exploratory testing. When making exploratory and final measurements it is necessary to maximize the measured radiated emission. Subclause 8.3.1.2 of C63.4-2003 states that the measurement is to be made “while keeping the antenna in the ‘cone of radiation’ from that area and pointed at the area both in azimuth and elevation, with polarization oriented for maximum response.” We consider the “cone of radiation” to be the 3 dB beamwidth of the measurement antenna.

While the “bore-sighting” technique is not explicitly mentioned in C63.4-2003, it is a useful technique for measurements using a directional antenna, such as a double-ridged waveguide antenna. Several precautions must be observed, including: knowledge of the beamwidth of the antenna and the resulting illumination area relative to the size of the EUT, estimation for source of the emission and general location within larger EUTS, measuring system sensitivity, etc.

C63.4-2003 requires that the measurement antenna is kept pointed at the source of the emission both in azimuth and elevation, with the polarization of the antenna oriented for maximum response. That means that if the directional radiation pattern of the EUT results in a maximum emission at an upwards angle from the EUT, when a directional antenna is used to make the measurement it will be necessary for it to be pointed towards the source of the emission within the EUT. This can be done by either pointing the antenna at an angle towards the source of the emission, or by rotating the EUT, in both height and polarization, to maximize the measured emission. The emission must be kept within the illumination area of the 3 dB beamwidth of the antenna so that the maximum emission from the EUT is measured.



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<b>Radiated emissions test characteristics</b>	
Frequency range	30 MHz - 4,000 MHz
Test distance	3 m*
Test instrumentation resolution bandwidth	120 kHz (30 MHz - 1,000 MHz)
	1 MHz (1000 MHz - 4,000 MHz)
Receive antenna scan height	1 m - 4 m
Receive antenna polarization	Vertical/horizontal

\* According to Section 15.31 (f) (1): At frequencies at or above 30 MHz, measurements may be performed at a distance other than what is specified provided: measurements are not made in the near field except where it can be shown that near field measurements are appropriate due to the characteristics of the device; and it can be demonstrated that the signal levels needed to be measured at the distance employed can be detected by the measurement equipment. When performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20dB/decade (inverse linear-distance for field strength measurements; inverse-linear-distance-squared for power density measurements).

### 11.3.4 Calculation of the field strength

The field strength is calculated by the following calculation:

Corrected Level = Receiver Level + Correction Factor (without the use of a pre-amplifier)

Corrected Level = Receiver Level + Correction Factor – Pre-amplifier (with the use of a pre-amplifier)

Receiver Level : Receiver reading without correction factors

Correction Factor : Antenna factor + cable loss

For example:

The receiver reading is 32.7 dB $\mu$ V. The antenna factor for the measured frequency is +2.5 dB (1/m) and the cable factor for the measured frequency is 0.71 dB, giving a field strength of 35.91dB $\mu$ V/m.

The 35.91dB $\mu$ V/m value can be mathematically converted to its corresponding level in  $\mu$ V/m.

Level in  $\mu$ V/m = Common Antilogarithm (35.91/20) = 39.8

For test distance other than what is specified, but fulfilling the requirements of Section 15.31 (f) (1) the field strength is calculated by adding additionally an extrapolation factor of 20 dB/decade (inverse linear distance for field strength measurements).

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## 11.3.5 Test result

TRANSMITTER SPURIOUS RADIATION BELOW 30 MHz (Section 15.205, 15.209)									
f (MHz)	Bandwidth (kHz) Type of detector	Noted receiver level dB $\mu$ V	Test distance m	Correction factor dB	Distance extrapol. factor dB	Level corrected dB $\mu$ V/m	Limit dB $\mu$ V/m	Margin dB $\mu$ V/m	Polarisation EUT / antenna orientation
0.1200	PK/0.2kHz	< 4.0	10	20.2	-59.1	-34.90	Pk46.0- @ 300	80.90	V, H/0-360°
	AV/0.2kHz	< 4.0	10	20.2	-59.1	-34.90	AV26.0 @ 300	80.90	V, H/0-360°
0.5000	AV/0.2kHz	< 4.0	10	20.2	-19.1	5.10	AV33.6 @ 30	28.5	V, H/0-360°
1.5000	AV/0.2kHz	< 4.0	10	20.2	-19.1	5.10	AV24.1 @ 30	19.00	V, H/0-360°
3.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
5.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
8.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
10.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
20.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
30.0000	AV/9.0kHz	< 4.0	10	20.2	-19.1	5.10	AV29.5 @ 30	24.4	V, H/0-360°
<b>No emissions detected</b>									
Measurement uncertainty			4 dB						

Remark: \*<sup>1</sup> Noise level of the measuring instrument  $\leq 4.0\text{dB}\mu\text{V}$  @ 10m distance (0.009 MHz – 30 MHz)

Remark: \* Peak Limit according to Section 15.35 (b).

The equipment meets the requirements	Yes	<del>No</del>	<del>N/A</del>
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Further test results are attached	<del>Yes</del>	No	Page no.
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n.a.\* See page no. 31

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**TRANSMITTER SPURIOUS RADIATION ABOVE 30 MHz (Section 15.205, 15.209)**

f (MHz)	Bandwidth (kHz) Type of detector	Noted receiver level dBµV	Test distance m	Correction factor dB	Distance extrapol. factor dB	AV Correction factor dB	Level corrected dBµV/m	Limit dBµV/m	Margin dBµV/m	Polaris. EUT / antenna	Antenna height cm
30.0000	100, AV	≤ 3.5	3	-2.60	0	0	0.90	40.00	39.10	H,V/H,V	100-400
88.0000	100, AV	≤ 3.5	3	-10.80	0	0	-7.30	40.00	47.30	H,V/H,V	100-400
216.0000	100, AV	≤ 3.5	3	-10.30	0	0	-6.80	43.50	50.30	H,V/H,V	100-400
960.0000	100, AV	≤ 3.5	3	8.50	0	0	12.00	43.50	31.50	H,V/H,V	100-400
1700.0000	1000, AV	≤ 4.5	3	3.80	0	0	8.30	54.00	45.70	H,V/H,V	100-400
2250.0000	1000, AV	≤ 10	3	8.00	0	0	18.00	54.00	36.00	H,V/H,V	100-400
4000.0000	1000, AV	≤ 10	3	8.40* <sup>6</sup>	0	0	18.40	54.00	35.60	H,V/H,V	100-400
5000.0000	1000, AV	≤ 10	3	9.10* <sup>6</sup>	0	0	19.40	54.00	34.60	H,V/H,V	100-400
7500.0000	1000, AV	≤ 14	3	12.9* <sup>6</sup> <sub>0</sub>	0	0	26.90	54.00	27.10	H,V/H,V	100-400
8300.0000	1000, AV	≤ 14	3	14.80* <sup>6</sup>	0	0	28.80	54.00	25.20	H,V/H,V	100-400
9400.0000	1000, AV	≤ 14	3	16.00* <sup>6</sup>	0	0	30.00	54.00	24.00	H,V/H,V	100-400
11000.0000	1000, AV	≤ 14	3	18.25* <sup>6</sup>	0	0	32.25	54.00	21.75	H,V/H,V	100-400
Measurement uncertainty			4 dB								

Bandwidth = the measuring receiver bandwidth

- Remark: \*<sup>1</sup> noise floor noise level of the measuring instrument ≤ 3.5dBµV @ 3m distance (30 – 1,000 MHz)
- Remark: \*<sup>2</sup> noise floor noise level of the measuring instrument ≤ 4.5dBµV @ 3m distance (1,000 – 2,000 MHz)
- Remark: \*<sup>3</sup> noise floor noise level of the measuring instrument ≤ 10dBµV @ 3m distance (2,000 – 5,500 MHz)
- Remark: \*<sup>4</sup> noise floor noise level of the measuring instrument ≤ 14dBµV @ 3m distance (5,500 – 14,500 MHz)
- Remark: \*<sup>5</sup> for using a pre-amplifier in the range between 100 kHz and 1,000 MHz
- Remark: \*<sup>6</sup> for using a pre-amplifier in the range between 1.0 GHz and 18.0 GHz

The equipment meets the requirements	Yes	<del>No</del>	<del>N.t.</del>
--------------------------------------	-----	---------------	-----------------

Further test results are attached	<del>Yes</del>	No	Page no.
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n.a.\* See page no. 31

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## 11.4 Periodic operation characteristics

### 11.4.1 Regulation

(a) The provisions of this Section are restricted to periodic operation within the band 40.66 - 40.70 MHz and above 70 MHz. Except as shown in paragraph (e) of this Section, the intentional radiator is restricted to the transmission of a control signal such as those used with alarm systems, door openers, remote switches, etc. Continuous transmissions, voice, video and the radio control of toys are not permitted. Data is permitted to be sent with a control signal. The following conditions shall be met to comply with the provisions for this periodic operation:

### 11.4.2 Test results

The equipment meets the requirements	Yes	<del>No</del>	<del>N.t.</del>
--------------------------------------	-----	---------------	-----------------

Further test results are attached	Yes	<del>No</del>	Annexe no. 11
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(1) A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released.

The equipment meets the requirements	Yes	<del>No</del>	<del>N.t.</del>
--------------------------------------	-----	---------------	-----------------

Further test results are attached	Yes	<del>No</del>	Annexe no. 11
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(2) A transmitter activated automatically shall cease transmission within 5 seconds after activation.

The equipment meets the requirements	Yes	<del>No</del>	<del>N.t.</del>
--------------------------------------	-----	---------------	-----------------

Further test results are attached	Yes	<del>No</del>	Annexe no. 11
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(3) Periodic transmissions at regular predetermined intervals are not permitted. However, polling or supervision transmissions, including data, to determine system integrity of transmitters used in security or safety applications are allowed if the total duration of transmissions does not exceed more than two seconds per hour for each transmitter. There is no limit on the number of individual transmissions, provided the total transmission time does not exceed two seconds per hour.

The equipment meets the requirements	<del>Yes</del>	<del>No</del>	N.t. <sup>3</sup>
--------------------------------------	----------------	---------------	-------------------

Further test results are attached	<del>Yes</del>	No	Page no.
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(4) Intentional radiators which are employed for radio control purposes during emergencies involving fire, security, and safety of life, when activated to signal an alarm, may operate during the pendency of the alarm condition.

The equipment meets the requirements	<del>Yes</del>	<del>No</del>	N.t. <sup>3</sup>
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Further test results are attached	<del>Yes</del>	No	
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(5) Transmission of set-up information for security systems may exceed the transmission duration limits in paragraphs (a)(1) and (a)(2) of this section, provided such transmission are under the control of a professional installer and do not exceed ten seconds after a manually operated switch is released or a transmitter is activated automatically. Such set-up information may include data.

The equipment meets the requirements	<del>Yes</del>	<del>No</del>	N.t. <sup>3</sup>
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Further test results are attached	<del>Yes</del>	No	
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n.a.\* See page no. 31

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## 11.5 Fundamental frequencies / Field strength limits

### 11.5.1 Regulation

(b) In addition to the provisions of Section 15.205, the field strength of emissions from intentional radiators operated under this Section shall not exceed the following:

Fundamental Frequency (MHz)	Field Strength of Fundamental (microvolts/meter)	Field Strength of Spurious Emissions (microvolts/meter)
40.66 - 40.70	2,250	225
70 - 130	1,250	125
130 - 174	1,250 to 3,750 **	125 to 375 **
174 - 260	3,750	375
260 - 470	3,750 to 12,500 **	375 to 1,250 **
Above 470	12,500	1,250

\*\* linear interpolations

[Where F is the frequency in MHz, the formulas for calculating the maximum permitted fundamental field strengths are as follows: for the band 130-174 MHz, uV/m at 3 meters =  $56.81818(F) - 6136.3636$ ; for the band 260-470 MHz, uV/m at 3 meters =  $41.6667(F) - 7083.3333$ . The maximum permitted unwanted emission level is 20 dB below the maximum permitted fundamental level.]

(1) The above field strength limits are specified at a distance of 3 meters. The tighter limits apply at the band edges.

(2) Intentional radiators operating under the provisions of this Section shall demonstrate compliance with the limits on the field strength of emissions, as shown in the above table, based on the average value of the measured emissions. As an alternative, compliance with the limits in the above table may be based on the use of measurement instrumentation with a CISPR quasi-peak detector. The specific method of measurement employed shall be specified in the application for equipment authorization. If average emission measurements are employed, the provisions in Section 15.35 for averaging pulsed emissions and for limiting peak emissions apply. Further, compliance with the provisions of Section 15.205 shall be demonstrated using the measurement instrumentation specified in that section.

(3) The limits on the field strength of the spurious emissions in the above table are based on the fundamental frequency of the intentional radiator. Spurious emissions shall be attenuated to the average (or, alternatively, CISPR quasi-peak) limits shown in this table or to the general limits shown in Section 15.209, whichever limit permits a higher field strength.

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### 11.5.2 Test equipment

Type	Manufacturer/ Model no.	Serial no.	Last calibration	Next calibration
Receiver (9 kHz –18.0 GHz)	Rohde & Schwarz Spectrum Analyzer FSL 18 (171a)	100.117	2008/10	2010/10
Receiver (9 kHz –40.0 GHz)	Anritsu Spectrum Analyzer MS2668C (359a)	6200163244	2009/04	2011/04
Pre-amplifier (100kHz - 1.3GHz)	Hewlett Packard 8447 E (166a)	1726A00705	2010/01	2012/01
Pre-amplifier (1GHz - 18GHz)	Narda --- (345)	---	2010/01	2012/01
Magnetic loop antenna (9 kHz - 30 MHz)	Schwarzbeck FMZB 1516 (23)	---	2008/09	2010/09
Bilog antenna (30- 1000 MHz)	Schwarzbeck VULP 9168 (406)		2007/02	2013/02
Horn antenna (0.86-8.5 GHz)	Schwarzbeck BBHA 9120 A (284)	236	2009/03	2013/03
Horn antenna (2.0-14.5 GHz)	Schwarzbeck BBHA 9120 C (169)	305	2009/03	2013/03
Horn antenna (14.5-40 GHz)	Schwarzbeck BBHA 9170 (281)	41	2009/03	2013/03
RF- cable	Kabelmetal 18m [N]	K1	2010/01	2011/01
RF- cable	Aircell 0.5m [BNC]	K40	2010/01	2011/01
RF- cable	Aircell 1m [BNC/N]	K56	2010/01	2011/01
RF- cable	Sucoflex 106 Suhner 6,4m [N]	K74	2010/01	2011/01
RF- cable	Sucoflex 106 Suhner 6,4m [N]	K75	2010/01	2011/01

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### 11.5.3 Test procedure

The EUT and this peripheral (when additional equipment exists) are placed on a turn table which is 0.8m above the ground. The turn table would be allowed to rotate 360 degrees to determine the position of the maximum emission level. The test distance between the EUT and the receiving antenna are 3m. To find the maximum emission, the polarization of the receiving antenna are changed in horizontal and vertical polarization, the position of the EUT was changed in different orthogonal determinations.

ANSI C63.4: 2003 Section 8 “Radiated emission measurements”

Measurement procedures for electric field radiated emissions above 1 GHz are covered in Clause 8 of ANSI C63.4-2003. The C63.4-2003 measurement procedure consists of both an exploratory test and a final measurement. The exploratory test is critical to determine the frequency of all significant emissions. For each mode of operation required to be tested, the frequency spectrum is monitored. Variations in antenna height, antenna orientation, antenna polarization, EUT azimuth, and cable or wire placement is explored to produce the emission that has the highest amplitude relative to the limit.

The final measurements are made based on the findings in the exploratory testing. When making exploratory and final measurements it is necessary to maximize the measured radiated emission. Sub clause 8.3.1.2 of C63.4-2003 states that the measurement is to be made “while keeping the antenna in the ‘cone of radiation’ from that area and pointed at the area both in azimuth and elevation, with polarization oriented for maximum response.” We consider the “cone of radiation” to be the 3 dB beam width of the measurement antenna.

While the “bore-sighting” technique is not explicitly mentioned in C63.4-2003, it is a useful technique for measurements using a directional antenna, such as a double-ridged waveguide antenna. Several precautions must be observed, including: knowledge of the beam width of the antenna and the resulting illumination area relative to the size of the EUT, estimation for source of the emission and general location within larger EUTS, measuring system sensitivity, etc.

C63.4-2003 requires that the measurement antenna is kept pointed at the source of the emission both in azimuth and elevation, with the polarization of the antenna oriented for maximum response. That means that if the directional radiation pattern of the EUT results in a maximum emission at an upwards angle from the EUT, when a directional antenna is used to make the measurement it will be necessary for it to be pointed towards the source of the emission within the EUT. This can be done by either pointing the antenna at an angle towards the source of the emission, or by rotating the EUT, in both height and polarization, to maximize the measured emission. The emission must be kept within the illumination area of the 3 dB beam width of the antenna so that the maximum emission from the EUT is measured.



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<b>Radiated emissions test characteristics</b>	
Frequency range	30 MHz - 4,000 MHz
Test distance	3 m*
Test instrumentation resolution bandwidth	120 kHz (30 MHz - 1,000 MHz)
	1 MHz (1000 MHz - 4,000 MHz)
Receive antenna scan height	1 m - 4 m
Receive antenna polarization	Vertical/horizontal

\*According to Section 15.31 (f) (1): At frequencies at or above 30 MHz, measurements may be performed at a distance other than what is specified provided: measurements are not made in the near field except where it can be shown that near field measurements are appropriate due to the characteristics of the device; and it can be demonstrated that the signal levels needed to be measured at the distance employed can be detected by the measurement equipment. When performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20dB/decade (inverse linear-distance for field strength measurements; inverse-linear-distance-squared for power density measurements).

#### 11.5.4 Calculation of field strength limits

For example: Transmitter working on 315 MHz

Limit for average measurements →  $41.6667 \cdot (315 \text{ MHz}) - 7083.3333 = 6041.677 \mu\text{V/m} = 75.6 \text{ dB}\mu\text{V/m} @ 3\text{m}$

Limit for peak measurements → Limit for average measurements + 20dB = 95.6dB $\mu\text{V/m} @ 3\text{m}$

#### 11.5.5 Calculation of the average correction factor

The average correction factor is computed by analyzing the "worst case" on time in any 100msec time period and using the formula: Corrections Factor + 20\*log (worst case on time/100msec). Analysis of the remote transmitter worst case on time in any 100msec time period is an on time of 50msec, therefore the correction factor is 20\*log (50/100) = - 6 dB. The maximum correction factor to be applied is 20 dB per section 15.35 of the FCC rules.

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### 11.5.6 Calculation of the field strengths

The field strength is calculated by the following calculation:

Corrected Level = Receiver Level + Correction Factor (without the use of a pre-amplifier)

Corrected Level = Receiver Level + Correction Factor – Pre-Amplifier (with the use of a pre-amplifier)

Receiver Level : Receiver reading without correction factors

Correction Factor : Antenna factor + cable loss

For example:

The receiver reading is 32.7 dB $\mu$ V. The antenna factor for the measured frequency is +2.5 dB (1/m) and the cable factor for the measured frequency is 0.71 dB, giving a field strength of 35.91dB $\mu$ V/m.

The 35.91dB $\mu$ V/m value can be mathematically converted to its corresponding level in  $\mu$ V/m.

Level in  $\mu$ V/m = Common Antilogarithm (35.91/20) = 39.8

For test distance other than what is specified, but fulfilling the requirements of Section 15.31 (f) (1) the field strength is calculated by adding additionally an extrapolation factor of 20 dB/decade (inverse linear distance for field strength measurements).

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## 11.5.7 Test result

## TRANSMITTER SPURIOUS RADIATION (Section 15.231(b))

f (MHz)	Bandwidth (kHz) / Type of detector	Noted receiver level dB $\mu$ V	Test distance m	Correction factor dB	Averaging correction Factor <sup>*7</sup> dB	Level corrected dB $\mu$ V/m	Limit AV dB $\mu$ V/m	Margin dB $\mu$ V/m	Polarisation EUT / antenna	Antenna height cm
315.000	100, PK	79.0	3	-5.1 <sup>*5</sup>	0	73.9	75.6	1.7	H, 90° / H	100
630.000	100, PK	42.5	3	-0.4 <sup>*5</sup>	0	42.1	55.6	13.5	H, 270° / H	119
945.000	100, PK	21.0	3	+5.0 <sup>*5</sup>	0	26.0	55.6	29.6	H, 270° / H	210
1260.000	1000, PK	37.3	3	+0.6 <sup>*6</sup>	0	37.9	55.6	17.7	H, 270° / H	100
1575.000	1000, PK	36.0	3	+2.0 <sup>*6</sup>	0	38.0	54.0	16.0	H, 290° / H	105
1890.000	1000, PK	38.9	3	+5.1 <sup>*6</sup>	0	44.0	55.6	11.6	H, 280° / H	180
2205.000	1000, PK	41.4	3	+7.2 <sup>*6</sup>	0	48.6	54.0	5.4	H, 270° / H	100
2520.000	1000, PK	44.6	3	+9.0 <sup>*6</sup>	0	53.6	55.6	2.0	H, 300° / H	195
2835.000	1000, PK	38.4	3	+9.8 <sup>*6</sup>	0	48.2	54.0	5.8	H, 300° / H	109
3150.000	1000, PK	38.8	3	+11.2 <sup>*6</sup>	0	50.0	55.6	5.6	H, 40° / H	262
3465.000	1000, PK	35.7	3	+13.0 <sup>*6</sup>	0	48.7	55.6	6.9	H, 30° / H	100
3780.000	1000, PK	37.3	3	+14.5	0	51.8	54.0	2.2	H, 270° / V	169
4095.000	1000, PK	34.3	3	+16.1	0	50.4	54.0	3.6	H, 30° / H	107
4410.000	1000, PK	15.5	3	+18.2	0	33.7	55.6	33.7	H, 30° / H	158
4725.000	1000, PK	33.9	3	+17.6	0	51.5	54.0	2.5	H, 30° / V	144
5355.000	1000, PK	27.1	3	+19.7	0	46.8	54.0	7.2	H, 30° / H	149

The frequencies fall into the restricted bands are blue marked

Measurement uncertainty

4 dB

Bandwidth = the measuring receiver bandwidth

- Remark: <sup>\*1</sup> noise floor noise level of the measuring instrument  $\leq 3.5\text{dB}\mu\text{V}$  @ 3m distance (30 – 1,000 MHz)  
 Remark: <sup>\*2</sup> noise floor noise level of the measuring instrument  $\leq 4.5\text{dB}\mu\text{V}$  @ 3m distance (1,000 – 2,000 MHz)  
 Remark: <sup>\*3</sup> noise floor noise level of the measuring instrument  $\leq 10\text{dB}\mu\text{V}$  @ 3m distance (2,000 – 5,500 MHz)  
 Remark: <sup>\*4</sup> noise floor noise level of the measuring instrument  $\leq 14\text{dB}\mu\text{V}$  @ 3m distance (5,500 – 14,500 MHz)  
 Remark: <sup>\*5</sup> for using a pre-amplifier in the range between 100 kHz and 1,000 MHz  
 Remark: <sup>\*6</sup> for using a pre-amplifier in the range between 1.0 GHz and 18.0 GHz  
 Remark: <sup>\*7</sup> for periodic operated transmitter (for calculations see Annex No. 10)

The equipment meets the requirements

Yes

~~No~~~~Not~~

Further test results are attached

~~Yes~~

No

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## 11.6 Bandwidth (20 dB)

### 11.6.1 Regulation

(c) The bandwidth of the emission shall be no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz. For devices operating above 900 MHz, the emission shall be no wider than 0.5% of the center frequency. Bandwidth is determined at the points 20 dB down from the modulated carrier.

### 11.6.2 Calculation of the 20 dB bandwidth limit

The 20 dB bandwidth limit =  $0.0025 * 315.00 \text{ MHz} = 787.5 \text{ kHz}$

### 11.6.3 Test equipment

Type	Manufacturer/ Model no.	Serial no.	Last calibration	Next calibration
Receiver (9 kHz –18.0 GHz)	Rohde & Schwarz Spectrum Analyzer FSL 18 (171a)	100.117	2008/10	2010/10
RF- cable	Sucoflex 104P Suhner 2,0m [APC]	K74	2010/01	2011/01
Test fixture	m.dudde hochfrequenz-technik	---	Verification previous to the measurement	

### 11.6.4 Test procedure

ANSI C63.4-2003 Section 13.1.7 Occupied bandwidth measurements. The bandwidth is measured at an amplitude level reduced from the reference level by a specified ratio. The reference level is the level of the highest amplitude signal observed from the transmitter at either the fundamental frequency or first-order modulation products in all typical modes of operation, including the unmodulated carrier, even if atypical. Once the reference level is established, the equipment is conditioned with typical modulating signals to produce worst-case (i.e., the widest) bandwidth. In order to measure the modulated signal properly, a resolution bandwidth that is small compared to the bandwidth required by the procuring or regulatory agency shall be used on the measuring instrument. However, the 6 dB resolution bandwidth of the measuring instrument shall be set to a value greater than 5% of the bandwidth requirements.

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**11.6.5 Test result**

The measured 20 dB bandwidth is: **77.8 kHz**

The equipment meets the requirements	Yes	<del>No</del>	<del>N.t.</del>
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Further test results are attached	Yes	<del>No</del>	Annexe no. 3
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## 11.7 Equipment authorization requirement

(Active transponder from the EUT; 125 kHz)

### 11.7.1 Regulation

(a) Intentional radiators operated as carrier current systems, devices operated under the provisions of §§ 15.211, 15.213 and 15.221, and devices operating below 490 kHz in which all emissions are at least 40 dB below the limits in Section 15.209 shall be verified pursuant to the procedures in Subpart J of Part 2 of this Chapter prior to marketing.

### 11.7.3 Test equipment

See page no. 15

### 11.7.4 Test procedure

See page no. 16-17

### 11.7.5 Test result

The equipment meets the requirements	Yes	<del>No</del>	<del>Not</del>
Further test results are attached	Yes	<del>No</del>	Page no. 18

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## 12. Additional information to the test report

### Remarks

- |                   |                                                               |
|-------------------|---------------------------------------------------------------|
| N.t. <sup>1</sup> | Not tested, because the antenna is part of the PCB            |
| N.t. <sup>2</sup> | Not tested, because the EUT is directly battery powered       |
| N.t. <sup>3</sup> | Not tested, because not applicable for this type of equipment |
| N.t. <sup>4</sup> | Not tested, because not ordered                               |

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**End of test report**