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Measured Radio Frequency Emissions From

**Lear Corporation Transmitter** FCC ID: KOBGT04A IC: 3521A-T04A

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For:

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### **Summary**

Tests for compliance with FCC Regulations, CFR 47, Part 15 and with Industry Canada RSS-210/Gen, were performed on a Lear, FCC ID: KOBGT04A, IC: 3521A-T04A. This device under test (DUT) is subject to the rules and regulations as a Transmitter.

In testing completed on January 9, 2013, the DUT tested met the allowed specifications for radiated emissions by 3.3 dB. Conducted emissions are not subject to regulation as the DUT is powered by a 3 VDC battery.

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#### 1. Introduction

This Lear Transmitter was tested for compliance with FCC Regulations, Part 15, adopted under Docket 87-389, April 18, 1989 as subsequently amended, and with Industry Canada RSS-210/Gen, Issue 8. Tests were performed at the University of Michigan Radiation Laboratory Willow Run Test Range following the procedures described in ANSI C63.4-2003 "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz". The Site description and attenuation characteristics of the Open Site facility are on file with FCC Laboratory, Columbia, Maryland (FCC Reg. No: 91050) and with Industry Canada, Ottawa, ON (File Ref. No: IC 2057A-1).

# 2. Equipment Used

The test equipment commonly used in our facility is listed in Table 2.1. Except where indicated as a pretest, monitoring, or support device; all equipment listed below is a part of the University of Michigan Radiation Laboratory (UMRL) quality system. This quality system has been established to ensure all equipment has a clearly identifiable classification, calibration expiry date, and that all calibrations are traceable to national standards.

Table 2.1 Test Equipment.

| <b>Test Instrument</b>             | Used        | Manufacturer/Model                     | Q Number  |
|------------------------------------|-------------|--|-----------|
| Spectrum Analyzer (9kHz-26GHz)     | $\boxtimes$ | Hewlett-Packard 8593E, SN: 3412A01131  | HP8593E1  |
| Spectrum Analyzer (9kHz-6.5GHz)    | $\boxtimes$ | Hewlett-Packard 8595E, SN: 3543A01546  | JDB8595E  |
| Power Meter                        |             | Hewlett-Packard, 432A                  | HP432A1   |
| Harmonic Mixer (26-40 GHz)         |             | Hewlett-Packard 11970A, SN: 3003A08327 | HP11970A1 |
| Harmonic Mixer (40-60 GHz)         |             | Hewlett-Packard 11970U, SN: 2332A00500 | HP11970U1 |
| Harmonic Mixer (75-110 GHz)        |             | Hewlett-Packard 11970W, SN: 2521A00179 | HP11970W1 |
| Harmonic Mixer (140-220 GHz)       |             | Pacific Millimeter Prod., GMA, SN: 26  | PMPGMA1   |
| S-Band Std. Gain Horn              |             | S/A, Model SGH-2.6                     | SBAND1    |
| C-Band Std. Gain Horn              |             | University of Michigan, NRL design     | CBAND1    |
| XN-Band Std. Gain Horn             |             | University of Michigan, NRL design     | XNBAND1   |
| X-Band Std. Gain Horn              |             | S/A, Model 12-8.2                      | XBAND1    |
| X-band horn (8.2- 12.4 GHz)        |             | Narda 640                              | XBAND2    |
| X-band horn (8.2- 12.4 GHz)        |             | Scientific Atlanta, 12-8.2, SN: 730    | XBAND3    |
| K-band horn (18-26.5 GHz)          |             | FXR, Inc., K638KF                      | KBAND1    |
| Ka-band horn (26.5-40 GHz)         |             | FXR, Inc., U638A                       | KABAND1   |
| U-band horn (40-60 GHz)            |             | Custom Microwave, HO19                 | UBAND1    |
| W-band horn(75-110 GHz)            |             | Custom Microwave, HO10                 | WBAND1    |
| G-band horn (140-220 GHz)          |             | Custom Microwave, HO5R                 | GBAND1    |
| Bicone Antenna (30-250 MHz)        | $\boxtimes$ | University of Michigan, RLBC-1         | LBBIC1    |
| Bicone Antenna (200-1000 MHz)      | $\boxtimes$ | University of Michigan, RLBC-2         | HBBIC1    |
| Dipole Antenna Set (30-1000 MHz)   | $\boxtimes$ | University of Michigan, RLDP-1,-2,-3   | UMDIP1    |
| Dipole Antenna Set (30-1000 MHz)   |             | EMCO 3121C, SN: 992 (Ref. Antennas)    | EMDIP1    |
| Active Rod Antenna (30 Hz-50 MHz)  |             | EMCO 3301B, SN: 3223                   | EMROD1    |
| Active Loop Antenna (30 Hz-50 MHz) |             | EMCO 6502, SN:2855                     | EMLOOP1   |
| Ridge-horn Antenna (300-5000 MHz)  | $\boxtimes$ | University of Michigan                 | UMRH1     |
| Amplifier (5-1000 MHz)             | $\boxtimes$ | Avantek, A11-1, A25-1S                 | AVAMP1    |
| Amplifier (5-4500 MHz)             | $\boxtimes$ | Avantek                                | AVAMP2    |
| Amplifier (4.5-13 GHz)             |             | Avantek, AFT-12665                     | AVAMP3    |
| Amplifier (6-16 GHz)               |             | Trek                                   | TRAMP1    |
| Amplifier (16-26 GHz)              |             | Avantek                                | AVAMP4    |
| LISN Box                           |             | University of Michigan                 | UMLISN1   |
| Signal Generator                   |             | Hewlett-Packard 8657B                  | HPSG1     |

#### 3. Device Under Test

# 3.1 Description & Block Diagram

The DUT is a 315 MHz Transmitter designed for automotive/vehicular applications and is powered by a 3 VDC lithium battery. The device is housed in a plastic case approximately 2 x 3 x 0.75 cm in dimension.

| Device | [Make], Model | [S/N],P/N | EMC Consideration |
|--------|---------------|-----------|-------------------|
| DUT    | Lear          | 15777636  |                   |
| DUT    | Lear          | 22733524  |                   |
| DUT    | Lear          | 15788021  |                   |
| DUT    | Lear          | 15788020  |                   |
| DUT    | Lear          | 15252034  |                   |
| DUT    | Lear          | 15114374  |                   |
| DUT    | Lear          | 15114375  |                   |
| DUT    | Lear          | 15114376  |                   |

### 3.2 Variants and Samples

There are a total of eight (8) electrically identical variants of the DUT, that employ slightly different exterior plastics but the same PCB. Please see the description of variants exhibit provided in this application. Two PCBs (one normal, one CW modified) were provided for testing along with samples of all 8 variant housings.

### 3.3 Modes of Operation

The DUT is capable of only a single mode of operation, as a manually actuated remote keyless entry transmitter.

### 3.4 Exemptions

None.

### 3.5 EMC Relevant Modifications

No EMI Relevant Modifications were performed by this test laboratory.

#### 4. Emissions Limits

### 4.1 Radiated Emissions Limits

The DUT tested falls under the category of an Intentional Radiator. The applicable testing frequencies and corresponding emission limits set by both the FCC and IC are given in Tables 4.1 and 4.2 below.

Table 4.1. TX Emission Limits (FCC: 15.231(b), .205(a); IC: RSS-210 2.7 T4).

| Frequency  | Fundaı<br>Ave. E <sub>li</sub> |      | Spurious** Ave. E <sub>lim</sub> (3m) |           |  |
|--|--------------------------------|------|---------------------------------------|-----------|--|
| (MHz)  | $(\mu V/m)$ dB $(\mu V/m)$     |      | $(\mu V/m)$                           | dB (μV/m) |  |
| 260.0-470.0  | 3750-12500*                    |      | 375-1250                              |           |  |
| 315  | 6042                           | 75.6 | 604.2                                 | 55.6      |  |
| 433.9  | 10966                          | 80.8 | 1096.6                                | 60.8      |  |
| 322-335.4<br>399.9-410<br>608-614  | Restr<br>Bar                   |      | 200                                   | 46.0      |  |
| 960-1240/1427(IC)<br>1300-1427<br>1435-1626.5<br>1645.5-1646.5 (IC)<br>1660-1710<br>1718.9-1722.2<br>2200-2300 | Restr<br>Bar                   |      | 500                                   | 54.0      |  |

<sup>\*</sup> Linear interpolation, formula: E = -7083 + 41.67\*f (MHz)

Table 4.2. Spurious Emission Limits (FCC: 15.33, .35, .109/209; IC: RSS-210 2.7, T2)

| Freq. (MHz) | $E_{lim}$ (3m) $\mu$ V/m | $E_{lim}dB(\mu V/m)$ |
|-------------|--------------------------|----------------------|
| 30-88       | 100                      | 40.0                 |
| 88-216      | 150                      | 43.5                 |
| 216-960     | 200                      | 46.0                 |
| 960-2000    | 500                      | 54.0                 |

Note: Average readings apply above 1000 MHz (1 MHz BW), Quasi-Peak readings apply to 1000 MHz (120 kHz RBW), PRF of intentional emissions > 20 Hz for QPK to apply.

#### **Power Line Conducted Emissions Limits**

Table 4.3 Emission Limits (FCC:15.107 (CISPR); IC: RSS-Gen, 7.2.2 T2).

| Frequency   | Class A    | (dBµV)             | Class B (dBµV) |          |  |  |
|-------------|------------|--------------------|----------------|----------|--|--|
| (MHz)       | Quasi-peak | Quasi-peak Average |                | Average  |  |  |
| .150 - 0.50 | 79         | 66                 | 66 - 56*       | 56 - 46* |  |  |
| 0.50 - 5    | 73         | 73 60              |                | 46       |  |  |
| 5 - 30      | 73         | 60                 | 60             | 50       |  |  |

#### Notes:

- 1. The lower limit shall apply at the transition frequency
- 2. The limit decreases linearly with the logarithm of the frequency in the range 0.15-0.50 MHz:
  - \*Class B Quasi-peak:  $dB\mu V = 50.25 19.12*log(f)$
  - \*Class B Average:  $dB\mu V = 40.25 19.12 \log(f)$
- 3. 9 kHz RBW

<sup>\*\*</sup> Measure up to tenth harmonic; 120 kHz BW up to 1 GHz, 1 MHz BW above 1 GHz

#### 5. Measurement Procedures

#### 5.1 Semi-Anechoic Chamber Radiated Emissions

To become familiar with the radiated emission behavior of the DUT, the device is first studied and measured in our shielded semi-anechoic chamber. In the chamber there is a set-up similar to that of an outdoor 3-meter site, with a turntable, an antenna mast, and a ground plane. Instrumentation includes spectrum analyzers and other equipment as needed.

The DUT is laid on the test table as shown in the included block diagram and/or photographs. A shielded loop antenna is employed when studying emissions from 9 kHz to 30 MHz. Above 30 MHz and below 250 MHz a biconical antenna is employed. Above 250 MHz a ridge or and standard gain horn antennas are used. The spectrum analyzer resolution and video bandwidths are set so as to measure the DUT emission without decreasing the emission bandwidth (EBW) of the device. Emissions are studied for all orientations (3-axes) of the DUT and all test antenna polarizations. In the chamber, spectrum and modulation characteristics of intentional carriers are recorded. Receiver spurious emissions are measured with an appropriate carrier signal applied. Associated test data is presented in subsequent sections.

#### **5.2 Outdoor Radiated Emissions**

After measurements are performed indoors, emissions on our outdoor 3-meter Open Area Test Site (OATS) are made, when applicable. If the DUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in ANSI C63.4 are employed. Alternatively, an on-table layout more representative of actual use may be employed if the resulting emissions appear to be worst-case in such a configuration. Any intentionally radiating elements are placed on the test table flat, on their side, and on their end (3-axes) and worst case emissions are recorded. For each configuration the DUT is rotated 360 degrees about its azimuth and the receive antenna is raised and lowered between 1 and 4 meters to maximize radiated emissions from the device. Receiver spurious emissions are measured with an appropriate carrier signal applied. For devices with intentional emissions below 30 MHz, our shielded loop antenna at a 1 meter receive height is used. Low frequency field extrapolation to the regulatory limit distance is employed as needed. Emissions between 30 MHz and 1 GHz are measured using tuned dipoles and/or biconical antennas. Care is taken to ensure that the RBW and VBW used meet the regulatory requirements, and that the EBW of the DUT is not reduced. The Photographs included in this report show the Test Setup.

# **5.3 Radiated Field Computations**

To convert the dBm values measured on the spectrum analyzer to  $dB(\mu V/m)$ , we use expression

$$E3(dB\mu V/m) = 107 + PR + KA - KG + KE - CF$$

where PR = power recorded on spectrum analyzer, dBm, measured at 3 m

KA = antenna factor, dB/m

KG = pre-amplifier gain, including cable loss, dB

KE = duty correction factor, dB

CF = distance conversion (employed only if limits are specified at alternate distance), dB

When presenting the data at each frequency, the highest measured emission under all of the possible DUT orientations (3-axes) is given.

### 5.4 Indoor Power Line Conducted Emissions

When applicable, power line conducted emissions are measured in our semi-anechoic chamber. If the DUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in ANSI C63.4 are employed. Alternatively, an on-table layout more representative of actual use may be employed if the resulting emissions appear to be worst-case in such a configuration.

The conducted emissions measured with the spectrum analyzer and recorded (in  $dB\mu V$ ) from 0-2 MHz and 2-30 MHz for both the ungrounded (Hi) and grounded (Lo) conductors. The spectrum analyzer is set to peak-hold mode in order to record the highest peak throughout the course of functional operation. Only when the emission exceeds or is near the limit are quasi-peak and average detection used.

# 5.5 Supply Voltage Variation

Measurements of the variation in the fundamental radiated emission were performed with the supply voltage varied by no less than 85% and 115% of the nominal rated value. For battery operated equipment, tests were performed using a new battery, and worst case emissions are re-checked employing a new battery.

#### 6. Test Results

#### **6.1 Radiated Emissions**

# **6.1.1** Correction for Pulse Operation

When the transmitter is activated by momentary manual button press, it can, in the worst case, transmit two 44.625 ms mixed PWM encoded frames, one of which may occur within any given 100 ms window. Each frame consists of 12 narrow (0.190 ms) PWM sync pulses followed by 69 encoding pulses which are all wide (0.385 ms), in the worst case. See Figure 6.1. Computing the duty factor results in:

$$K_E = (12 \ x \ 0.190 \ ms + 69 \ x \ 0.385 \ ms) \ / \ 100 \ ms = 0.288 \ or \ -10.8 \ dB.$$

### **6.1.2 Emission Spectrum**

The relative DUT emission spectrum is recorded and is shown in Figure 6.2.

#### 6.1.3 Emission Bandwidth

The emission bandwidth of the signal is shown in Figure 6.3. The allowed 99% bandwidth is 0.25% of 315 MHz, or 787.25 kHz. From the plot we see that the EBW is 58.0 kHz.

### **6.1.4** Supply Voltage and Supply Voltage Variation

The DUT has been designed to be powered by a 3 VDC lithium battery. For this test, relative radiated power was measured at the fundamental as the voltage was varied from 2.0 to 4.0 volts. The emission variation is shown in Figure 6.4.

Batteries: before testing  $V_{oc} = 3.28 \text{ V}$ 

after testing  $V_{oc} = 3.03 \text{ V}$ 

Ave. current from batteries I = 5.6 mA (cw)

#### **6.2 Conducted Emissions**

These tests do not apply, since the DUT is powered from a 3 VDC battery.

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**Table 6.1 Highest Emissions Measured** 

| Radiated Emission - RF Lear, 315MHz, GMAX RKE; FCC/IC |        |      |      |           |        |        |        |            |          |          |       |               |
|---|--------|------|------|-----------|--------|--------|--------|------------|----------|----------|-------|---------------|
| Freq. Ant. Ant. Pr Det. Ka Kg                         |        |      |      |           |        |        | Kg     | E3*        | E3lim    | Pass     |       |               |
| #   | MHz    | Used | Pol. | dBm       | Used   | dB/m   | dB     | dBμV/m     | dΒμV/m   | dB       |       | Comments      |
| 1   | 315.0  | Dip  | Н    | -19.9     | Pk     | 18.6   | 22.9   | 72.0       | 75.6     | 3.6      | flat  | GM/L:22733524 |
| 2   | 315.0  | Dip  | V    | -22.6     | Pk     | 18.6   | 22.9   | 69.3       | 75.6     | 6.3      | end   |               |
| 3   | 630.0  | Dip  | Н    | -49.7     | Pk     | 24.4   | 19.9   | 51.0       | 55.6     | 4.6      | flat  |               |
| 4   | 630.0  | Dip  | V    | -50.3     | Pk     | 24.4   | 19.9   | 50.4       | 55.6     | 5.2      | end   |               |
| 5   | 945.0  | Dip  | Н    | -63.2     | Pk     | 28.8   | 18.0   | 43.9       | 55.6     | 11.8     | flat  |               |
| 6   | 945.0  | Dip  | V    | -64.3     | Pk     | 28.8   | 18.0   | 42.8       | 55.6     | 12.9     | end   |               |
| 7   | 1260.0 | Horn | Н    | -56.7     | Pk     | 20.6   | 28.0   | 32.1       | 54.0     | 21.9     | flat  |               |
| 8   | 1575.0 | Horn | Н    | -65.0     | Pk     | 21.5   | 28.0   | 24.7       | 54.0     | 29.3     | flat  |               |
| 9   | 1890.0 | Horn | Н    | -60.2     | Pk     | 22.2   | 28.0   | 30.2       | 55.6     | 25.4     | side  |               |
| 10  | 2205.0 | Horn | Н    | -60.7     | Pk     | 23.0   | 28.1   | 30.4       | 54.0     | 23.6     | side  |               |
| 11  | 2520.0 | Horn | Н    | -57.7     | Pk     | 23.9   | 28.3   | 34.1       | 55.6     | 21.6     | side  |               |
| 12  | 2835.0 | Horn | Н    | -63.9     | Pk     | 24.8   | 28.2   | 28.9       | 54.0     | 25.1     | side  |               |
| 13  | 3150.0 | Horn | Н    | -67.6     | Pk     | 25.8   | 27.9   | 26.5       | 55.6     | 29.1     | flat  |               |
| 14  |        |      |      |           |        |        |        |            |          |          |       |               |
| 15  | 315.0  | Dip  | Н    | -19.9     | Pk     | 18.6   | 22.9   | 72.0       | 75.6     | 3.6      | flat  | GM/L:15113476 |
| 16  | 315.0  | Dip  | Н    | -19.6     | Pk     | 18.6   | 22.9   | 72.3       | 75.6     | 3.3      | flat  | GM/L:15788020 |
| 17  | 315.0  | Dip  | Н    | -19.6     | Pk     | 18.6   | 22.9   | 72.3       | 75.6     | 3.3      | flat  | GM/L:15788021 |
| 18  | 315.0  | Dip  | Н    | -19.9     | Pk     | 18.6   | 22.9   | 72.0       | 75.6     | 3.6      | flat  | GM/L:15114375 |
| 19  | 315.0  | Dip  | Н    | -19.9     | Pk     | 18.6   | 22.9   | 72.0       | 75.6     | 3.6      | flat  | GM/L:15252034 |
| 20  | 315.0  | Dip  | Н    | -19.7     | Pk     | 18.6   | 22.9   | 72.2       | 75.6     | 3.4      | flat  | GM/L:15114374 |
| 21  | 315.0  | Dip  | Н    | -20.0     | Pk     | 18.6   | 22.9   | 71.9       | 75.6     | 3.7      | flat  | GM/L:15777636 |
| 22  |        |      |      |           |        |        |        |            |          |          |       |               |
| 23  |        |      |      |           |        |        |        |            |          |          |       |               |
| 24  |        |      |      | *In       | cludes | 10.8   | dB Dı  | ıty Factor |          |          |       |               |
| 25  |        |      |      |           |        |        |        |            |          |          |       |               |
| 26  |        |      | Digi | ital emis | ssions | more t | han 20 | dB below   | w FCC/IC | Class 1  | B Lim | it.           |
| 27  |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        | ondu   | cted En    | nissions | <b>!</b> |       |               |
|   | Freq.  | Line | Det. | Vtest     |        |        |        | _          | _        |          |       |               |
| #   | MHz    | Side | Used | dΒμV      | dΒμV   | dB     |        |            | Commen   | ts       |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |
|   |        |      |      |           |        |        |        |            |          |          |       |               |

Meas. 01/08-09/13; U of Mich.

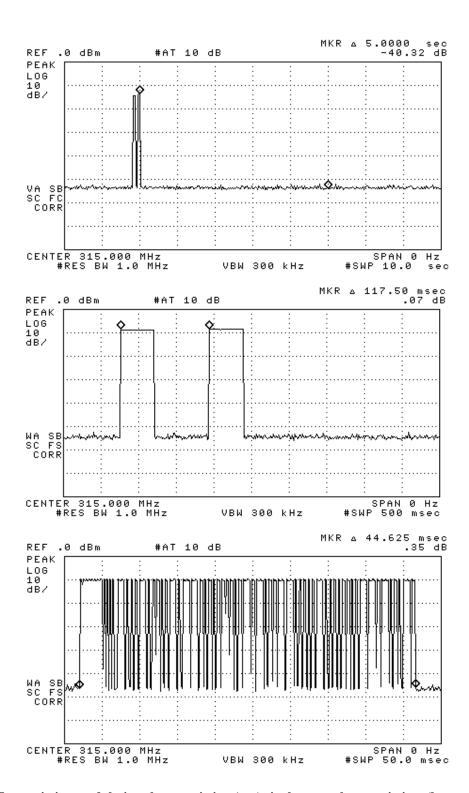


Figure 6.1(a). Transmission modulation characteristics. (top) single manual transmission, (bottom) expanded frame

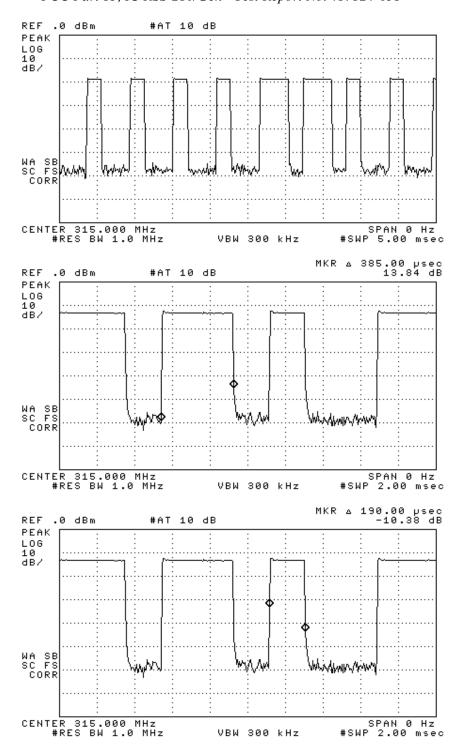


Figure 6.1(b). Transmission modulation characteristics. (top) PWM frame encoding, (center) PWM wide, (bottom) PWM narrow.

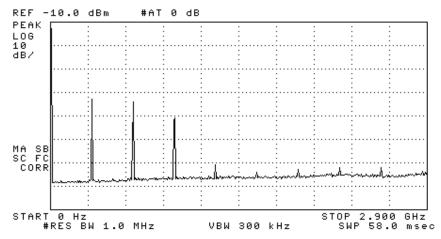


Figure 6.2. Emission spectrum of the DUT (pulsed emission). Amplitudes are only indicative (not calibrated).

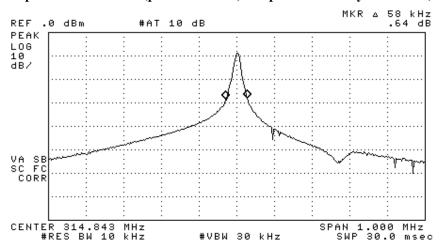


Figure 6.3. Measured emission bandwidth of the DUT (pulsed).

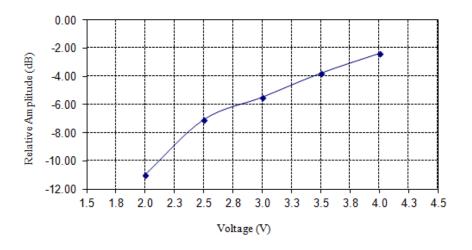


Figure 6.4. Relative emission at fundamental vs. supply voltage (pulsed).



Photograph 6.5. DUT on OATS (one of three axes tested)



Photograph 6.6. Close-up of DUT on OATS (one of three axes tested)