



FCC PART 15, SUBPART C
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 LP0002-2018

TEST REPORT

For

Cisco Systems Inc.

125 West Tasman Dr., San Jose, CA 95134, USA

FCC ID: LDKCSPUD1977
IC: 2461N-CSPUD1977

Report Type: Original Report	Model: AIR-BLE-USB	
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* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "**"

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1902191-247	Original Report	2019-03-05

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Cisco Systems Inc.*, and their product model: *AIR-BLE-USB*, FCC ID: *LDKCSPUD1977*, IC: *2461N-CSPUD1977*, or the “EUT” as referred to in this report. It is a USB Dongle with BLE functions. It operates in the 2.4 GHz bands.

1.2 Mechanical Description of EUT

The EUT product measures approximately 68 mm (L) x 15 mm (W) x 8 mm (H) and weighs approximately 10 g.

1.3 Objective

This report is prepared on behalf of *Cisco Systems Inc.*, in accordance with Part 2, Subpart J, and Part 15, and C of the Federal Communication Commission’s rules, ISEDC RSS-247 Issue 2, February 2017 and LP0002-2018.

The objective is to determine compliance with FCC Part 15.247, ISEDC RSS-247 and LP0002-2018 rules for Output Power, Antenna Requirements, and Radiated Spurious Emissions.

1.4 Related Submittal(s)/Grant(s)

None

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices, and FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices,

Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03) to certify

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)

- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v04.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

2.2 EUT Exercise Software

The test firmware used was Tera Term, provided by *Cisco Systems Inc.*, the software is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Power Setting
BLE	2402	5
	2440	5
	2480	5

Data Rates Tested:

BLE: default

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v04 section 6.0:

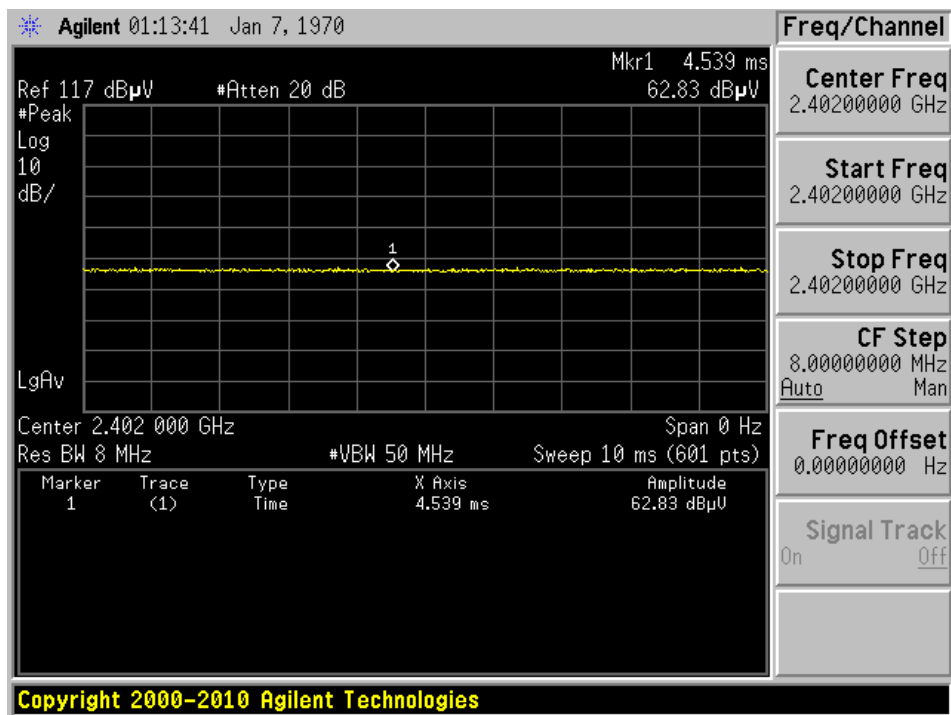
Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

Radio Mode	Total On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
BLE	1	1	100	0

Duty Cycle = On Time (ms)/ Period (ms)

Duty Cycle Correction Factor (dB) = 10*log(1/Duty Cycle)

Please refer to the following plots.



2.4 Equipment Modifications

No equipment modifications are made to the EUT

2.5 Local Support Equipment

Manufacturer	Description	Model
Dell	Laptop	Latitude E6410

2.6 Support Equipment

Manufacturer	Description	Model
Cisco	Power supply	ADP 48DR BC LPS

2.7 Interface Ports and Cabling

Cable Description	Length (m)	To	From
RS232 male to Ethernet cable	1 m	RS232 female to USB cable	EUT
RS232 female to USB cable	1 m	Laptop	RS232 male to Ethernet cable
Ethernet cable	1 m	Laptop	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC & IC Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §6.8 LP0002-2018 §2.2	Antenna Requirement	Compliant
FCC §15.207 ISED RSS-Gen §8.8 LP0002-2018 §2.3	AC Line Conducted Emissions	Compliant ¹
FCC §2.1091, §15.247(i) ISED RSS-102 LP0002-2018 §5.20.2	RF Exposure	Compliant
FCC §2.1051, §15.247 (d) ISED RSS-247 §5.5 LP0002-2018 §3.10	Spurious Emissions at Antenna Port	Compliant ¹
FCC §2.1053, §15.205, §15.209, §15.247 (d) ISED RSS-247 §5.5 ISED RSS-Gen §8.9 and §8.10 LP0002-2018 §3.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISED RSS-247 §5.2 (1) LP0002-2018 §3.10	6 dB and 99% Emission Bandwidth	Compliant ¹
FCC §15.247(b)(3) ISED RSS-247 §5.4 (4) LP0002-2018 §3.10	Output Power	Compliant ¹
FCC §15.247(d) ISED RSS-247 §5.5 LP0002-2018 §3.10	100 kHz Bandwidth of Frequency Band Edge	Compliant ¹
FCC §15.247(e) ISED RSS-247 §5.2 (2) LP0002-2018 §3.10	Power Spectral Density	Compliant ¹

Note: Please refer to the Cisco EMC Test Report No: EDCS –16580269 for the testing result.

4 FCC §15.203, ISEDC RSS-Gen §6.8 & LP0002-2018 §2.2 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

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.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For licence-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device's ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

The antennas used by the EUT is embedded antenna with Omni pattern,

Antenna usage	Band of Operation (MHz)	Maximum Antenna Gain (dBi)
BLE	2400-2500	1.9

5 FCC §2.1091, §15.247(i), ISEDC RSS-102 & LP0002-2018 §5.20.2 - RF Exposure

5.1 Applicable Standards

According to §2.1091 (Mobile Devices) RF exposure is calculated.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minute)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	30
1.34-30	824/f	2.19/f	*(180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

Note: f = frequency in MHz

* = Plane-wave equivalent power density

According to ISED RSS-102 Issue 5:

2.5.2 Exemption Limits for Routine Evaluation – RF Exposure Evaluation

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz⁶ and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

5.3 MPE Results

For transmission with BLE:

Maximum peak output power at antenna input terminal (dBm):	3.92
Maximum peak output power at antenna input terminal (mW):	2.47
Prediction distance (cm):	20
Predication frequency (MHz):	2402
Maximum Antenna Gain, typical (dBi):	2.0
Maximum Antenna Gain (numeric):	1.58
Power density of prediction frequency at prediction distance (mW/cm ²):	0.00078
FCC limit (mW/cm ²):	1.00

5.4 IC RF Exposure Evaluation

2.4 GHz BLE:

$$3.92 + 2.0 \text{ dBi} = 5.92 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 2.68 \text{ W} = 34.27 \text{ dBm}$$

Conclusion

In order to meet the multi-transmitter RF Exposure requirement, all transceiver modules must be installed with a separation distance of no less than **20** cm from all persons.

6 FCC §15.209, §15.247(d), ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 & LP0002-2018 §3.10 - Spurious Radiated Emissions

6.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) except as show 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	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3332 – 3339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	33458 – 3358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(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 (micro volts/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

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (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)).

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

6.3 Test Procedure

The EUT host, and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

For radiated testing the EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 3MHz / Sweep = 100 ms
- (2) Average: RBW = 1MHz / VBW = 3MHz / Sweep = Auto

6.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

6.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Agilent	Analyzer, Spectrum	E4446A	MY48250238	2018-05-08	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 years
Wisewave	Antenna, Horn	ARH-4223-02	10555-02	2017-12-15	2 years
HP/ Agilent	Amplifier, Pre	8449B OPT HO2	3008A0113	2018-04-02	1 year
Insulated Wire INC	2.92mm (M) X2, 1501 Armor Neoprene, 396	KPS-1501AN- 3960-KPS	DC 1807	2018-03-13	1 year
-	SMA cable	-	C00011	Each time ¹	N/A
-	N-Type Cable	-	C00012	Each time ¹	N/A
-	N-Type Cable	-	C00014	Each time ¹	N/A
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2017-03-27	2 years
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cables included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) “A2LA Policy on Metrological Traceability”.

6.6 Test Environmental Conditions

Temperature:	22-25 °C
Relative Humidity:	29-30 %
ATM Pressure:	102.1 kPa

The testing was performed by Harry Zhao from 2019-02-20 in 5m chamber 3.

6.7 Summary of Test Results

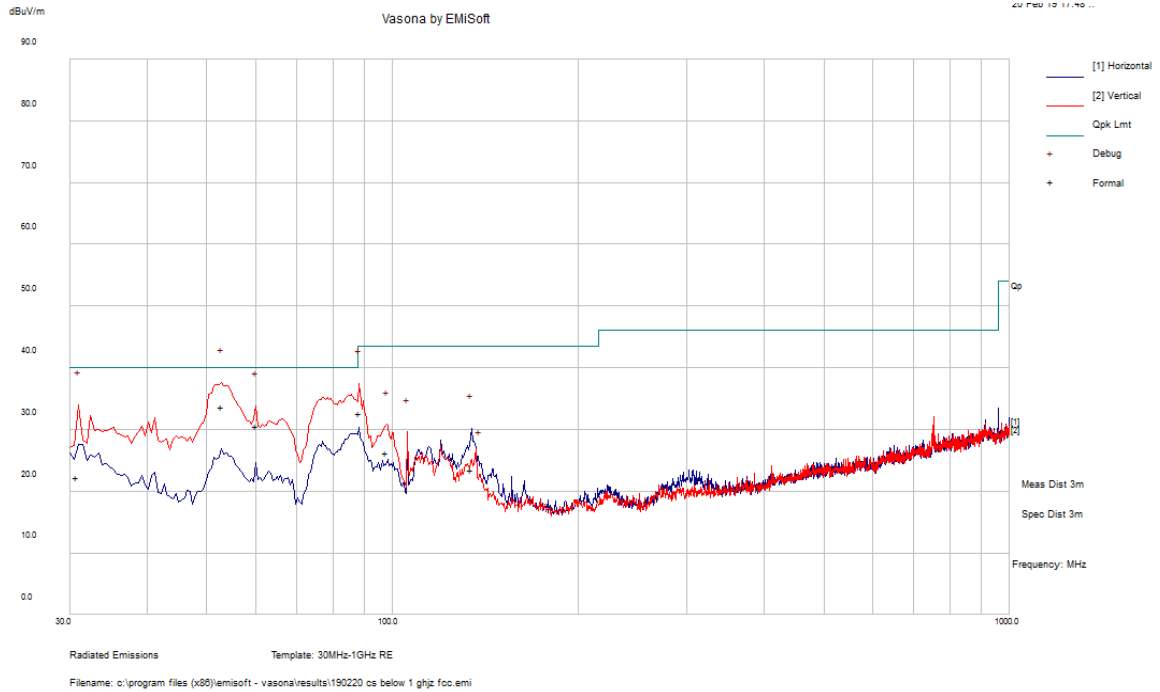
According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting		
Margin (dB)	Frequency (MHz)	Mode, channel
-2.37	4804	BLE, 2402

Please refer to the following table and plots for specific test result details

6.8 Test Results

1) 30 MHz – 1 GHz Worst Case at 2480 MHz , Measured at 3 meters



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
52.937	33.66	112	V	75	40	-6.34	Pass
88.4215	32.66	135	V	221	43.5	-10.84	Pass
30.82275	22.2	160	V	353	40	-17.8	Pass
60.00675	30.58	213	V	19	40	-9.42	Pass
97.66075	26.33	143	V	329	43.5	-17.17	Pass
134.2255	23.47	107	H	342	43.5	-20.03	Pass

Note: Only chosen the worst 6 Emissions were tested in formal scan because all other emissions were 20 dB below the limit.

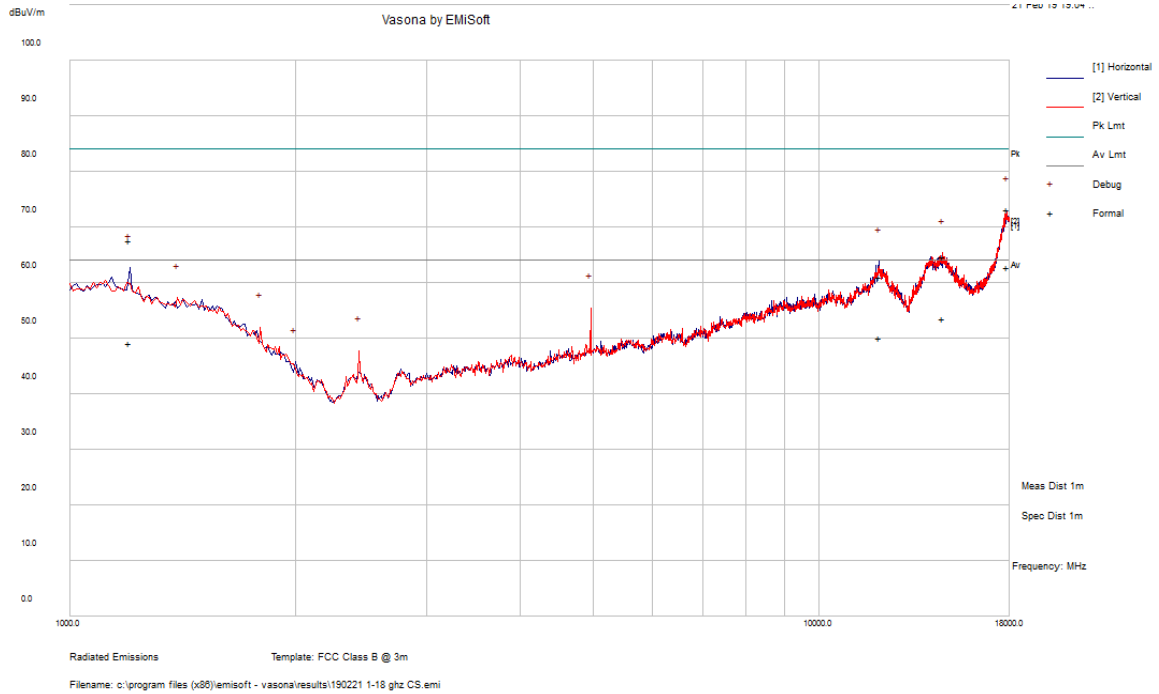
2) 1GHz-18 GHz, measured at 3 meters

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 2402 MHz											
2402	57.35	214	100	H	28.32	5.08	0.00	90.75	-	-	PK
2402	56.50	214	100	H	28.32	5.08	0.00	89.90	-	-	AV
2402	61.08	226	100	V	28.32	5.08	0.00	94.48	-	-	PK
2402	60.53	226	100	V	28.32	5.08	0.00	93.93	-	-	AV
2390	27.54	0	100	H	28.33	5.08	0.00	60.96	74.00	-13.04	PK
2390	15.88	0	100	H	28.33	5.08	0.00	49.30	54.00	-4.70	AV
2390	27.01	0	100	V	28.33	5.08	0.00	60.43	74.00	-13.57	PK
2390	15.95	0	100	V	28.33	5.08	0.00	49.37	54.00	-4.63	AV
4804	53.86	255	100	H	32.86	7.43	38.17	55.98	74.00	-18.02	PK
4804	49.34	255	100	H	32.86	7.43	38.17	51.46	54.00	-2.54	AV
4804	54.05	174	153	V	32.86	7.43	38.17	56.17	74.00	-17.83	PK
4804	49.51	174	153	V	32.86	7.43	38.17	51.63	54.00	-2.37	AV
Middle Channel 2440 MHz											
2440	60.65	166	103	H	28.37	5.08	0.00	94.10	-	-	PK
2440	60.22	166	103	H	28.37	5.08	0.00	93.67	-	-	AV
2440	62.31	226	153	V	28.37	5.08	0.00	95.76	-	-	PK
2440	61.53	226	153	V	28.37	5.08	0.00	94.98	-	-	AV
4880	52.39	259	100	H	33.19	7.43	38.09	54.91	74.00	-19.09	PK
4880	46.81	259	100	H	33.19	7.43	38.09	49.33	54.00	-4.67	AV
4880	51.85	239	100	V	33.19	7.43	38.09	54.37	74.00	-19.63	PK
4880	46.54	239	100	V	33.19	7.43	38.09	49.06	54.00	-4.94	AV
High Channel 2480 MHz											
2480	61.34	170	100	H	28.26	5.08	0.00	94.68	-	-	PK
2480	60.81	170	100	H	28.26	5.08	0.00	94.15	-	-	AV
2480	62.33	221	100	V	28.26	5.08	0.00	95.67	-	-	PK
2480	61.92	221	100	V	28.26	5.08	0.00	95.26	-	-	AV
2483.5	26.93	0	100	H	28.26	5.08	0.00	60.27	74.00	-13.73	PK
2483.5	16.04	0	100	H	28.26	5.08	0.00	49.38	54.00	-4.62	AV
2483.5	26.88	0	100	V	28.26	5.08	0.00	60.22	74.00	-13.78	PK
2483.5	16.00	0	100	V	28.26	5.08	0.00	49.34	54.00	-4.66	AV
4960	51.29	265	100	H	33.15	7.60	38.15	53.89	74.00	-20.11	PK
4960	45.00	265	100	H	33.15	7.60	38.15	47.60	54.00	-6.40	AV
4960	49.61	236	100	V	33.15	7.60	38.15	52.21	74.00	-21.79	PK
4960	43.00	236	100	V	33.15	7.60	38.15	45.60	54.00	-8.40	AV

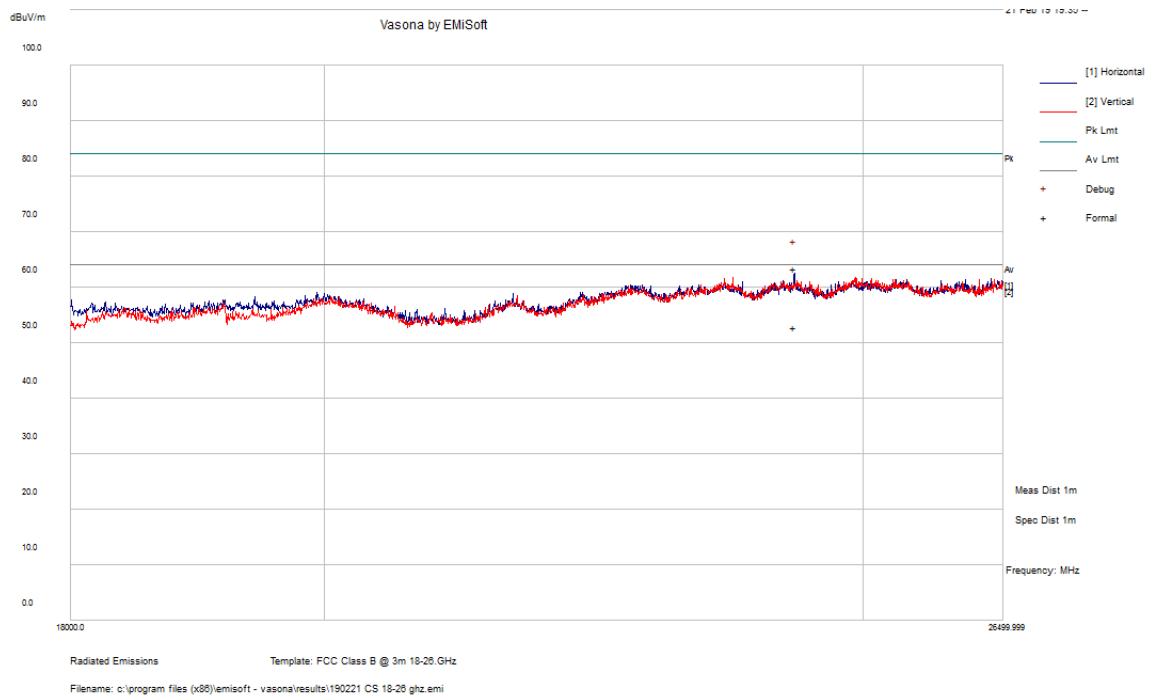
The worst case channel plot has been listed below.

1 GHz – 18 GHz measured at 1 meter.

This test was performed with a 2.4 – 2.4835 GHz band reject filter.



18 GHz – 26.5 GHz measured at 1 meter



7 Appendix A (Normative) - FCC & ISED Equipment Labeling Requirements

7.1 FCC ID Label Requirements

As per FCC §2.925,

(a) Each equipment covered in an application for equipment authorization shall bear a nameplate or label listing the following:

(1) FCC Identifier consisting of the two elements in the exact order specified in §2.926. The FCC Identifier shall be preceded by the term FCC ID in capital letters on a single line, and shall be of a type size large enough to be legible without the aid of magnification.

Example: FCC ID: XXX123

Where: XXX—Grantee Code, 123—Equipment Product Code

As per FCC §15.19,

(a) In addition to the requirements in part 2 of this chapter, a device subject to certification, or verification shall be labeled as follows:

(3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

(4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified above is required to be affixed only to the main control unit. If the EUT is integrated within another device then a label affixed to the host shall also state, "Contains FCC ID: XXXXXX"

(5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

7.2 IC Label Requirements

As per IC RSP-100 Section 3.1, the certification number shall appear as follows:

IC: XXXXXX-YYYYYYYY

Where:

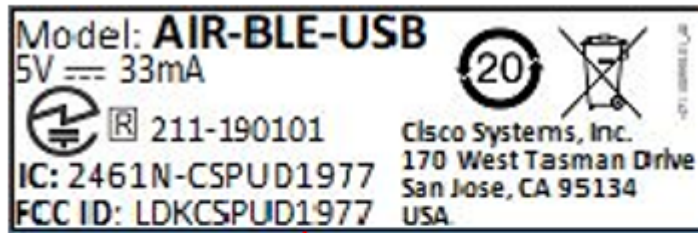
- The letters "IC:" indicate that this is an Innovation, Science and Economic Development Canada's certification number, but they are not part of the certification number. XXXXXXYYYYYYYYYYY is the ISED certification number.
- XXXXXX is the CN assigned by Innovation, Science and Economic Development Canada. Newly assigned CNs will be made up of five numeric characters (e.g. "20001") whereas existing CNs may consist of up to five numeric characters followed by an alphabetic character (e.g. "21A" or "15589J").
- YYYYYYYYYYYY is the Unique Product Number (UPN) assigned by the applicant, made up of a maximum of 11 alphanumeric characters.
- The CN and UPN are limited to capital alphabetic characters (A-Z) and numerals (0-9) only. The use of punctuation marks or other symbols, including "wildcard" characters, is not permitted.

- The HVIN may contain punctuation marks or symbols but they shall not represent any indeterminate (“wildcard”) characters.

As per RSS-Gen §2.1 Equipment Labeling:

The application for equipment certification shall be submitted in accordance with Industry Canada’s Radio Standards Procedure RSP-100, Radio Equipment Certification Procedure which sets out the requirements for certification and labelling of radio apparatus. RSP-100 shall be used in conjunction with RSS-Gen and other Radio Standards Specifications (RSSs) specifically applicable to the type of radio apparatus for which certification is sought.

7.3 Recommended Label Contents and Location



8 Appendix B (Normative) – EUT Test Setup Photographs

Please see attachments.

9 Appendix C (Normative) – EUT External Photographs

Please see attachments.

10 Appendix D (Normative) – EUT Internal Photographs

Please see attachments.

11 Appendix E (Normative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 General requirements for the competence of testing and calibration laboratories. This laboratory also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 2nd day of October 2018.

President and CEO
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2020

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

----- END OF REPORT -----