



Intertek Testing Services
ETL SEMKO

Alco Communications Limited

Application
For
Certification

2.4GHz Frequency Hopping Spread Spectrum Cordless Phone with Caller ID

(FCC ID: LSEALCOMTL9035)

WO# 03083251
TL/Ann Choy
June 25, 2003

- The test results reported in this report shall refer only to the sample actually tested and shall not refer or be deemed to refer to bulk from which such a sample may be said to have been obtained.
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FCC ID: LSEALCOMTL9035

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MEASUREMENT/TECHNICAL REPORT

Alco Communications Limited- MODEL: TL9038, TL9035
FCC ID: LSEALCOMTL9035

This report concerns (check one) Original Grant X Class II Change _____

Equipment Type: DSS-Part 15 Spread Spectrum Transmitter

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes _____ No X _____

If yes, defer until : _____
date

Company Name agrees to notify the Commission by: _____
date

of the intended date of announcement of the product so that the grant can be issued on
that date.

Transition Rules Request per 15.37? Yes _____ No X _____

If no, assumed Part 15, Subpart C for intentional radiator - the new 47 CFR [08-20-02
Edition] provision.

Report prepared by:

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List of attached file

Exhibit type	File Description	filename
Test Report	Test Report	report.pdf
Operation Description	Technical Description	descri.pdf
Test Setup Photo	Radiated Emission for Base	config photos.doc
Test Setup Photo	Radiated Emission for Handset	config photos.doc
Test Report	Maximum Output Power Plot	bmaxop.pdf, hmaxop.pdf
Test Report	20 dB Bandwidth Plot	b20dB.pdf, h20dB.pdf
Test Report	Minimum Number of Hopping Frequencies	bchno.pdf, hchno.pdf
Test Report	Minimum Hopping Channel Carrier Frequency Separation	bfsepa.pdf, hfsepa.pdf
Test Report	Average Channel Occupancy Time	bavetime.pdf, havetime.pdf
Test Report	Out Band Antenna Conducted Emission Plot	bobantcon.pdf, hobantcon.pdf
Test Report	Duty Cycle Calculation and Measurement	bdcc.pdf, hdcc.pdf
Test Setup Photo	Conducted Emission	config photos.doc
Test Report	Conducted Emission Test Result	conduct.pdf
External Photo	External Photo	external photos.doc
Internal Photo	Internal Photo	internal photos.doc
Block Diagram	Block Diagram	block.pdf
Schematics	Circuit Diagram	circuit.pdf
ID Label/Location	Label Artwork and Location	label.pdf
User Manual	User Manual	manual.pdf
User Manual	FCC Information	FCC information.pdf
RF Exposure Info	RF Safety	RF exposure info.pdf

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EXHIBIT 1
SUMMARY OF TEST RESULTS

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1.0 Summary of Test

Alco Communications Limited- MODEL: TL9038, TL9035 FCC ID: LSEALCOMTL9035

TEST	REFERENCE	RESULTS
Max. Output Power	15.247(b)	Pass
Min. No. of Hopping Frequencies	15.247(a)(1)	Pass
Min. Hopping Channel Carrier Frequency Separation	15.247(a)(1)	Pass
Average Time of Occupancy	15.247(a)(1)	Pass
Out of Band Antenna Conducted Emission	15.247(c)	Pass
Radiated Emission in Restricted Bands	15.247(c)	Pass
AC Conducted Emission	15.207	Pass
Radiated Emission from Digital Part	15.109	Pass
Antenna Requirement	15.203	Pass (See Notes)

Notes: The EUT uses a permanently attached antenna which, in accordance to Section 15.203, is considered sufficient to comply with the provisions of this section.

EXHIBIT 2
GENERAL DESCRIPTION

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2.0 General Description

2.1 Product Description

The TL9038 is a 2.4GHz Frequency Hopping Spread Spectrum Cordless Phone with Caller ID. It operates at frequency range of 2403.648 MHz to 2479.680 MHz with 15 hopping frequencies for base and 45 hopping frequencies for handset. The unit is capable of either tone or pulse dialing. The internal power supply's isolation is accomplished through a power transformer having an adequate dielectric rating. The circuit wiring is consistent under the requirement of part 68.

The handset unit consists of a keypad with twelve standard keys (0,...9,*,#), three function keys (INT/Redial/Pause, Scroll Up key, Scroll Down key). A OFF hook key and ON hook key are provided to control pick and release telephone line in a toggle base.

The base unit has a intercom key, which is used to communicate with handset unit.

The antennas used in base unit and handset are integral, and the test sample is a prototype.

The Model: TL9035 is the same as the Model: TL9038 in hardware aspect except cosmetic difference. The difference in model number serves as marketing strategy.

The circuit description, frequency hopping algorithm, and RF Module Specification are saved with filename: descri.pdf

Connection between the device and the telephone network is accomplished through the use of USOC RJ11C in the 2-wire loop calling central office line.

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2.2 Related Submittal(s) Grants

This is an application for Certification of a DSS-Part 15 Spread Spectrum Cordless Telephone System. Two transmitters are included in this application. The device is also subject to Part 68 Registration.

2.3 Test Methodology

Both AC mains line-conducted and radiated emission measurements were performed according to the procedures in ANSI C63.4 (1992). All measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section**" of this Application. All other measurements were made in accordance with the procedures in part 2 of CFR 47.

2.4 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC.

EXHIBIT 3
SYSTEM TEST CONFIGURATION

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3.0 System Test Configuration

3.1 Justification

For emission testing, the equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). During testing, all cables were manipulated to produce worst case emissions. The handset was powered by a fully charged battery.

For the measurements, the EUT is attached to a plastic stand if necessary and placed on the wooden turntable. If the base unit attaches to peripherals, they are connected and operational (as typical as possible). The handset is remotely located as far from the antenna and the base as possible to ensure full power transmission from the base. Else, the base is wired to transmit full power without modulation.

The signal is maximized through rotation and placement in the three orthogonal axes. The antenna height and polarization are varied during the search for maximum signal level. The antenna height is varied from 1 to 4 meters. Detector function is in peak mode. Radiated emissions are taken at three meters unless the signal level is too low for measurement at that distance. If necessary, a pre-amplifier is used and/or the test is conducted at a closer distance.

All readings are extrapolated back to the equivalent three meter reading using inverse scaling with distance. Analyzer resolution is 100 kHz or greater for frequencies below 1000MHz. The resolution is 1MHz or greater for frequencies above 1000MHz.

Radiated emission measurement were performed from the lowest radio frequency signal generated in the device which is greater than 9kHz to 25GHz.

3.2 EUT Exercising Software

The EUT exercise program used during radiated and conducted testing was designed to exercise the various system components in a manner similar to a typical use.

For emissions testing, the units were setup to transmit continuously to simplify the measurement methodology. Care was taken to ensure proper power supply voltages during testing.

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3.3 Support Equipment List and Description

The FCC ID's for all equipment, plus descriptions of all cables used in the tested system (included inserted cards, which have grants) are:

HARDWARE:

The unit was operated standalone. An AC adapter (provided with the unit) was used to power the device. Its description is listed below.

- (1) AC adapter with two meter unshielded power cord permanently affixed.

CABLES:

- (1) Telecommunication cable with RJ11C connectors (1m, unshielded), terminated

OTHERS:

- (1) A headset for telephone use with 1.2m unshielded cable permanently affixed.
(Supplied by ITS)

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3.4 Equipment Modification

Any modifications installed previous to testing by Alco Communication Limited will be incorporated in each production model sold/leased in the United States.

No modifications were installed by ETL Division, Intertek Testing Services Hong Kong Ltd.

All the items listed under section 3.0 of this report are confirmed by:

Confirmed by:

*Tommy Leung
Supervisor
Intertek Testing Services Hong Kong Ltd.
Agent for Alco Communication Limited*



Signature

June 25, 2003 _____ Date

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EXHIBIT 4
MEASUREMENT RESULTS

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.0 Measurement Results

4.1 Maximum Conducted Output Power at Antenna Terminals, FCC Rules 15.247(b) :

[] The antenna power of the EUT was connected to the input of a power meter. Power was read directly and cable loss correction was added to the reading to obtain power at the EUT antenna terminals.

[x] The antenna port of the EUT was connected to the input of a spectrum analyzer. The analyzer was set for $RBW > 20\text{dB}$ bandwidth and power was read directly in dBm. External attenuation and cable loss were compensated for using the OFFSET function of the analyser.

For antennas with gains of 6 dBi or less, maximum allowed transmitter output is 1 watt (+30 dBm).

For antennas with gains greater than 6 dBi, transmitter output level must be decreased by an amount equal to (GAIN - 6) dBm.

(Base Unit) Antenna Gain = 3 dBi		
Frequency (MHz)	Output in dBm	Output in mWatt
Low Channel: 2403.974	17.22	52.72
Middle Channel: 2441.990	16.91	49.09
High Channel: 2479.543	16.13	42.76

Cable loss : 0.5 dB External Attenuation : N/A dB

Cable loss, external attenuation: [x] included in OFFSET function
[] added to SA raw reading

EUT Transmit Antenna Gain(dBi) + dBm max. output level = 20.22 dBm (27 dBm or less)

Please refer to the attached plots for details:

Plot B1a: Low Channel Output Power
Plot B1b: Middle Channel Output Power
Plot B1c: High Channel Output Power

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

Maximum Conducted Output Power at Antenna Terminals, FCC Rules 15.247(b) - Continued:

(Handset Unit) Maximum Antenna Gain = 3 dBi		
Frequency (MHz)	Output in dBm	Output in mWatt
Low Channel: 2403.554	17.47	55.85
Middle Channel: 2441.493	16.50	44.67
High Channel: 2479.800	17.19	52.36

Cable loss : 0.5 dB External Attenuation : N/A dB

Cable loss, external attenuation: [x] included in OFFSET function
[] added to SA raw reading

EUT Transmit Antenna Gain(dBi) + dBm max. output level = 20.47 dBm (27 dBm or less)

Please refer to the attached plots for details:

Plot H1a: Low Channel Output Power

Plot H1b: Middle Channel Output Power

Plot H1c: High Channel output Power

For electronic filing, the above plots are saved with filename: bmaxop.pdf, hmaxop.pdf

For RF Safety, the information is saved with filename: RF exposure info.pdf.

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.2 Maximum 20 dB RF Bandwidth, FCC Rule 15.247(a)(1):

The antenna port of the EUT was connected to the input of a spectrum analyzer. Analyzer RES BW was chosen so that the display was a result of the hopping channel modulation. For each RF output channel investigated, the spectrum analyzer center frequency was set to the channel carrier. A PEAK output reading was taken, a DISPLAY line was drawn 20 dB lower than PEAK level. The 20 dB bandwidth was determined from where the channel output spectrum intersected the display line.

(Base Unit)	
Frequency (MHz)	20 dB Bandwidth (kHz)
2479.689	1251

Refer to the following plots for 20 dB bandwidth sharp:

Plot B2a: Low Channel 20 dB RF Bandwidth

Plot B2b: Middle Channel 20 dB RF Bandwidth

Plot B2c: High Channel 20 dB RF Bandwidth

For electronic filing, the above plots are saved with filename: b20dB.pdf

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

Maximum 20 dB RF Bandwidth, FCC Rule 15.247(a)(1) - Continued:

(Handset Unit)	
Frequency (MHz)	20 dB Bandwidth (kHz)
2441.664 and 2479.680	1384

Refer to the following plots for 20 dB bandwidth sharp:

Plot H2a: Low Channel 20 dB RF Bandwidth

Plot H2b: Middle Channel 20 dB RF Bandwidth

Plot H2c: High Channel 20 dB RF Bandwidth

For electronic filing, the above plots are saved with filename: h20dB.pdf

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.3 Minimum Number of Hopping Frequencies, FCC Rule 15.247(a)(1) :

The RF passband of the EUT was divided into 3-4 approximately equal bands. With the analyzer set to MAX HOLD readings were taken for 2-3 minutes in each band. The channel peaks so recorded were added together, and the total number compared to the minimum number of channels required in the regulation.

Base Unit	
No. of hopping channels	15

Handset (Walkie-Talkie Mode)	
No. of hopping channels	45

Handset (Talk Mode)	
No. of hopping channels	15

Minimum Requirements: at least 15 non-overlapping channels for 2400-2483.5MHz.

For electronic filing, the above plots are saved with filename: bchno.pdf, hchno.pdf.

Plot B3a-c: No. of hopping channels of base unit.

Plot H3a-d: No. of hopping channels of handset.

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.4 Minimum Hopping Channel Carrier Frequency Separation, FCC Ref: 15.247(a)(1) :

Using the DELTA MARKER function of the analyzer, the frequency separation between two adjacent channels was measured and compared against the limit.

[] 25 kHz [x] 20 dB bandwidth of hopping channel: 1.251MHz

Base Unit	
Channel Separation (Worst-case)	5.090 MHz

Plot B4: Channel 0 and Channel 3

Requirement: the frequency separation is more than 20dB bandwidth of hopping channel.

For electronic filing, the above plots are saved with filename: bfsepa.pdf

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.4 Minimum Hopping Channel Carrier Frequency Separation, FCC Ref: 15.247(a)(1) - Continued:

Using the DELTA MARKER function of the analyzer, the frequency separation between two adjacent channels was measured and compared against the limit.

[] 25 kHz [x] 20 dB bandwidth of hopping channel: 1.384MHz

Handset	
Channel Separation	1.693 MHz

Plot H4: Channel 0 and Channel 1

Requirement: the frequency separation is more than 20dB bandwidth of hopping channel.

For electronic filing, the above plots are saved with filename: hfsepa.pdf

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.5 Average Channel Occupancy Time, FCC Ref: 15.247(a)(1)

The spectrum analyzer center frequency was set to one of the known hopping channels. The SWEEP was set to 50ms, the SPAN was set to ZERO SPAN, and the TRIGGER was set to VIDEO. The time duration of the transmission so captured was measured with the MARKER DELTA function.

The SWEEP was then set to the time required by the regulation (20 seconds for 902-928 MHz devices, if the 20dB bandwidth is less than 250kHz, 10 seconds for 902-928 MHz if the 20dB bandwidth is or greater than 250kHz, “0.4 seconds x Number of hopping channels employed” seconds for 2400-2483.5 MHz, 30 seconds for 5725-5850 MHz). The analyzer was set to SINGLE SWEEP, the total ON time was added and compared against the limit (0.4 seconds).

Base Unit:

Average 0.4 seconds maximum occupancy in 6 seconds (0.4sec x 15) for 2400-2483.5MHz.

Average Occupancy Time = $414.3\mu\text{s} \times 5 \times 40$	82.86 ms
--	----------

Refer to attached spectrum analyzer plots B5a and B5b

Handset:

Average 0.4 seconds maximum occupancy in 6 seconds (0.4sec x 15) in Talk mode and in 18 seconds (0.4sec x 45) in Walkie-Talkie mode for 2400-2483.5MHz.

Handset Unit (Worst-case: Talk mode)	
Average Occupancy Time = $414.3\mu\text{s} \times 80$	33.14 ms

Refer to attached spectrum analyzer plot H5a.1-H5a.2 for Talk mode, and plot H5b.1-H5b.2 for Walkie-Talkie mode.

For electronic filing, the above plots are saved with filename: bavetime.pdf, havetime.pdf.

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Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.6 Out of Band Radiated Emissions, FCC Rule 15.247(c):

In any 100 kHz bandwidth outside the EUT passband, the RF power produced by the modulation products of the spreading sequence, the information sequence, and the carrier frequency shall be at least 20 dB below that of the maximum in-band 100 kHz emission, or else shall meet the general limits for radiated emissions at frequencies outside the passband, whichever results in lower attenuation.

All other types of emissions from the EUT shall meet the general limits for radiated frequencies outside the passband.

Refer to the following plots for out of band conducted emissions data:

Plot B6a.1 - B6a.2: Low Channel Emissions
Plot B6b.1 - B6b.2: Middle Channel Emissions
Plot B6c.1 - B6c.2: High Channel Emissions
Plot B6d.1 - B6d.2: Modulation Products Emissions*
Plot H6a.1 - H6a.2: Low Channel Emissions
Plot H6b.1 - H6b.2: Middle Channel Emissions
Plot H6c.1 - H6c.2: High Channel Emissions
Plot H6d.1- H6d.2: Modulation Products Emissions*

The plots showed the 2nd harmonic and modulation products at the band edges of 2400 MHz and 2483.5 MHz. In addition, all spurious emission and up to the tenth harmonic was measured and they were found to be at least 26 dB below the highest level of the desired power in the passband.

Furthermore, delta measurement technique for measuring bandedge emissions was incorporated in the test of the edge at 2483.5MHz.

*These 2 plots are shown the worst-case which has been already considered between enable and disable the hopping function of the EUT.

For electronic filing, the above plots are saved with filenames: bobantcon.pdf, hobantcon.pdf

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.7 Out of Band Radiated Emissions (for emissions in 4.6 above that are less than 26 dB below carrier), FCC Rule 15.247(c):

For out of band emissions that are close to or that exceed the 20dB attenuation requirement described in the specification, radiated measurements were performed at a 3m separation distance to determine whether these emissions complied with the general radiated emission requirement.

- Not required, all emissions more than 26dB below fundamental
- See attached data sheet

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.8 Transmitter Radiated Emissions in Restricted Bands, FCC Rule 15.35(b), (c):

Data is included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included. All measurements were performed with peak detection unless otherwise specified.

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.9 Field Strength Calculation

The field strength is calculated by adding the reading on the Spectrum Analyzer to the factors associated with preamplifiers (if any), antennas, cables, pulse desensitization and average factors (when specified limit is in average and measurements are made with peak detectors). A sample calculation is included below.

$$FS = RA + AF + CF - AG + PD + AV$$

where FS = Field Strength in dB μ V/m

RA = Receiver Amplitude (including preamplifier) in dB μ V

CF = Cable Attenuation Factor in dB

AF = Antenna Factor in dB

AG = Amplifier Gain in dB

PD = Pulse Desensitization in dB

AV = Average Factor in -dB

In the radiated emission table which follows, the reading shown on the data table may reflect the preamplifier gain. An example of the calculations, where the reading does not reflect the preamplifier gain, follows:

$$FS = RA + AF + CF - AG + PD + AV$$

Example

Assume a receiver reading of 62.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted. The pulse desensitization factor of the spectrum analyzer was 0 dB, and the resultant average factor was -10 dB. The net field strength for comparison to the appropriate emission limit is 32 dB μ V/m. This value in dB μ V/m was converted to its corresponding level in μ V/m.

RA = 62.0 dB μ V

AF = 7.4 dB

CF = 1.6 dB

AG = 29.0 dB

PD = 0 dB

AV = -10 dB

$$FS = 62 + 7.4 + 1.6 - 29 + 0 + (-10) = 32 \text{ dB}\mu\text{V/m}$$

$$\text{Level in mV/m} = \text{Common Antilogarithm} [(32 \text{ dB}\mu\text{V/m})/20] = 39.8 \mu\text{V/m}$$

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.10 Radiated Emission Configuration Photograph - Base Unit

Worst Case Radiated Emission
at
12018.240MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: config photos.doc

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Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.11 Radiated Emission Data - Base Unit

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 9.0dB

TEST PERSONNEL:



Tester Signature

Yvonne Leung, Engineer

Typed/Printed Name

June 25, 2003

Date

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 0

Date of Test: May 28, 2003 to June 13, 2003

Table 1, Base Unit

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
V	*4807.296	57.5	34.0	34	13.7	43.8	54	-10.2
V	*12018.240	52.5	40.2	34	13.7	45.0	54	-9.0
H	*19229.184	41.9	45.3	34	13.7	39.5	54	-14.5

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 22

Date of Test: May 28, 2003 to June 13, 2003

Table 2, Base unit

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
V	*4883.328	58.0	34.0	34	13.7	44.3	54	-9.7
H	*7324.992	55.6	37.0	34	13.7	44.9	54	-9.1
V	*12208.320	56.8	40.2	34	13.7	49.3	54	-4.7
H	*19533.312	41.7	45.3	34	13.7	39.3	54	-14.7

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 44

Date of Test: May 28, 2003 to June 13, 2003

Table 3, Base unit

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
H	** 2479.680	115.1	29.1	34	13.7	96.5	---	---
V	* 4959.360	57.6	34.0	34	13.7	43.9	54	-10.1
V	* 7439.040	60.1	37.0	34	13.7	49.4	54	-4.6
H	* 12398.400	51.8	40.2	34	13.7	44.3	54	-9.7
H	* 19837.440	41.9	45.3	34	13.7	39.5	54	-14.5

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

** Fundamental emission was measured for determining band-edge compliance of using delta measurement technique.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.12 Radiated Emission Configuration Photograph - Handset

Worst Case Radiated Emission
at
7439.040MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: config photos.doc

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.13 Radiated Emission Data - Handset

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 13.0 dB

TEST PERSONNEL:



Tester Signature

Yvonne Leung, Engineer
Typed/Printed Name

June 25, 2003
Date

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 0

Date of Test: May 28, 2003 to June 13, 2003

Table 4, Handset

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
V	*4807.296	57.0	34.0	34	21.6	35.4	54	-18.6
V	*12018.240	52.4	40.2	34	21.6	37.0	54	-17.0
H	*19229.184	41.9	45.3	34	21.6	31.6	54	-22.4

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 22

Date of Test: May 28, 2003 to June 13, 2003

Table 5, Handset

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
V	*4883.328	57.3	34.0	34	21.6	35.7	54	-18.3
V	*7324.992	59.5	37.0	34	21.6	40.9	54	-13.1
V	*12208.320	51.4	40.2	34	21.6	36.0	54	-18.0
H	*19533.312	42.2	45.3	34	21.6	31.9	54	-22.1

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038
Mode : TX-Channel 44

Date of Test: May 28, 2003 to June 13, 2003

Table 6, Handset

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Average Factor (-dB)	Net 3m at (dB μ V /m)	Limit at 3m (dB μ V /m)	Margin (dB)
H	** 2479.680	115.4	29.1	34	21.6	88.9	---	---
V	* 4959.360	57.8	34.0	34	21.6	36.2	54	-17.8
V	* 7439.040	59.6	37.0	34	21.6	41.0	54	-13.0
V	* 12398.400	51.9	40.2	34	21.6	36.5	54	-17.5
H	* 19837.440	41.7	45.3	34	21.6	31.4	54	-22.6

NOTES: 1. Peak Detector data

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak limit for frequencies below 1000 MHz and average limit for frequencies over 1000 MHz. The radio frequency emissions above 1GHz also meet corresponding 20dB permitted peak limit with a peak detector function.

** Fundamental emission was measured for determining band-edge compliance of using delta measurement technique.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.14 AC Line Conducted Emission, FCC Rule 15.207:

- Not required; battery operation only
- Test data attached

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.15 Line Conducted Configuration Photograph - Base

Worst Case Line-Conducted Configuration

For electronic filing, the worst case line conducted configuration photographs are saved with filename: config photos.doc

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.16 Line Conducted Emission Data

The data on the following pages list the significant emission frequencies, the limit, and the margin of compliance.

Judgement : Passed by more than 20dB margin

For electronic filing, the worst case line conducted emission data are saved with filename: conduct.pdf

TEST PERSONNEL:



Tester Signature

Yvonne Leung, Engineer

Typed/Printed Name

June 25, 2003

Date

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.17 Radiated Emissions from Digital Section of Transceiver (Transmitter), FCC Ref: 15.109

- Not required - No digital part
- Test results are attached
- Included in the separated DOC report.

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
 Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

Table 7, Base

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
H	179.719	31.7	15.5	16	31.2	43.5	-12.3
H	248.822	39.4	11.4	16	34.8	46.0	-11.2
H	262.647	39.0	12.4	16	35.4	46.0	-10.6
H	276.485	43.0	13.3	16	40.3	46.0	-5.7
H	290.301	42.3	13.3	16	39.6	46.0	-6.4
H	304.135	38.5	14.3	16	36.8	46.0	-9.2
H	307.589	35.1	14.3	16	33.4	46.0	-12.6
H	314.497	34.2	14.3	16	32.5	46.0	-13.5
H	317.951	39.6	14.3	16	37.9	46.0	-8.1
H	331.792	36.5	14.6	16	35.1	46.0	-10.9
H	345.608	38.8	14.6	16	37.4	46.0	-8.6
H	359.430	35.7	14.9	16	34.6	46.0	-11.4
H	373.246	40.7	14.9	16	39.6	46.0	-6.4
H	376.700	33.8	15.4	16	33.2	46.0	-12.8
H	387.062	37.5	15.4	16	36.9	46.0	-9.1
H	400.898	38.0	15.9	16	37.9	46.0	-8.1
H	428.543	33.9	16.3	16	34.2	46.0	-11.8

NOTES: 1. Quasi-peak detector is used for the emission below or equal to 1000 MHz.

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.

3. Negative value in the margin column shows emission below limit.

4. Horn antenna and average detector are used for the emission over 1000MHz.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

Table 8, Handset

Radiated Emissions

Polarization	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dB μ V /m)	Limit (dB μ V /m)	Margin (dB)
H	148.405	35.3	11.6	16	30.9	43.5	-12.6
H	179.711	32.9	15.5	16	32.4	43.5	-11.1
H	248.809	37.8	11.4	16	33.2	46.0	-12.8
H	262.648	37.7	12.4	16	34.1	46.0	-11.9
H	276.486	38.1	13.3	16	35.4	46.0	-10.6
H	314.496	34.8	14.3	16	33.1	46.0	-12.9
H	345.608	37.3	14.6	16	35.9	46.0	-10.1
H	373.248	35.1	14.9	16	34.0	46.0	-12.0
H	400.898	33.5	15.9	16	33.4	46.0	-12.6
H	428.542	33.1	16.3	16	33.4	46.0	-12.6

NOTES:

1. Quasi-peak detector is used for the emission below or equal to 1000 MHz
2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.

Test Engineer: Yvonne Leung

INTERTEK TESTING SERVICES

Company: Alco Communications Limited
Model: TL9038

Date of Test: May 28, 2003 to June 13, 2003

4.18 Transmitter Duty Cycle Calculation and Measurements, FCC Rule 15.35(b), (c)

The EUT antenna output port was connected to the input of the spectrum analyzer. The analyzer center frequency was set to EUT RF channel carrier. The SWEP function on the analyzer was set to ZERO SPAN. The transmitter ON time was determined from the resultant time-amplitude display:

Base Unit:

Duty cycle = Maximum ON time is 2.07msec/10msec for three handsets operations

$$\begin{aligned}\text{Duty cycle correction, dB} &= 20 * \log (\text{DC}) \\ &= 20 * \log (0.207) \\ &= -13.7 \text{dB}\end{aligned}$$

Handset:

Duty cycle = Maximum ON time is 0.4143msec x 2/10msec for double slot in Talk mode

$$\begin{aligned}\text{Duty cycle correction, dB} &= 20 * \log (\text{DC}) \\ &= 20 * \log (0.083) \\ &= -21.6 \text{dB}\end{aligned}$$

X	See attached spectrum analyzer chart (s) for transmitter timing Base Unit: Plot B7, Handset: Plot H7
	See transmitter timing diagram provided by manufacturer
	Not applicable, duty cycle was not used.

For electronic filing, the above plots are saved with filenames: bdcc.pdf, hdcc.pdf.

INTERTEK TESTING SERVICES

EXHIBIT 5
EQUIPMENT PHOTOGRAPHS

INTERTEK TESTING SERVICES

5.0 **Equipment Photographs**

For electronic filing, the photographs are saved with filename: external photos.doc & internal photos.doc

EXHIBIT 6
PRODUCT LABELLING

INTERTEK TESTING SERVICES

6.0 **Product Labelling**

For electronic filing, the FCC ID label artwork and location is saved with filename: label.pdf

INTERTEK TESTING SERVICES

EXHIBIT 7
TECHNICAL SPECIFICATIONS

7.0 Technical Specifications

For electronic filing, the block diagram and circuit diagram are saved with filename: block.pdf and circuit.pdf respectively.

INTERTEK TESTING SERVICES

EXHIBIT 8
INSTRUCTION MANUAL

INTERTEK TESTING SERVICES

8.0 Instruction Manual

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf.

Please note that the required FCC Information to the User is saved with filename: FCC information.pdf.

This manual will be provided to the end-user with each unit sold/leased in the United States.

INTERTEK TESTING SERVICES

EXHIBIT 9
SECURITY CODE INFORMATION

INTERTEK TESTING SERVICES

9.0 Security code information

For security code information, ID code, total $65535 * 65535$ (Equipment Manufacturer's Code & Serial No.) combinations for both handset & base unit. It will only be entered at production stage and the security code will be varied continuously or randomly as each package is produced.

In this model, each base and each handset has its own unique ID. This ID is assigned in the mass production stage. It is just like the engine number in every car.

In this model, there are two operation modes, one is subscription mode, and other is normal mode. In subscription mode, the handset will send its ID to the base, and the base will record this ID as a legal ID. The subscription is done in the mass production stage or if you want to add the two extra handsets.

For example, you buy one base and two handsets [A, B] first. The IDs of handset A and handset B are recorded into the base in production stage. Then you buy another two extra handsets. You can set the base into subscription mode, now the two extra handsets will send their IDs to the base for subscription.

In normal operation, the base will check the handset ID. If it is illegal, the base will deny the connection request from this illegal handset.