

EMC Technologies Pty Ltd

ABN 82 057 105 549
57 Assembly Drive
Tullamarine Victoria Australia 3043

Ph: +613 9335 3333 Fax: +613 9338 9260 email: melb@emctech.com.au

FCC PART 15.209 & RSS-210

FCC ID: LXP-VIM223 Industry Canada ID: 2298A-VIM223

Test Sample: XD Smartra Immobiliser

Tested for: Robert Bosch Australia

Report Number: M040411_Cert_Immobiliser

Issue Date: 16th August 2004

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NATA Accredited Laboratory

Number: 5292

EMI TEST REPORT FOR CERTIFICATION FCC Part 15.209 & RSS-210

EMC Technologies Report No. M040411_Cert_Immobiliser

Issue Date: 16th August 2004

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to FCC PART 15.209 & RSS-210

Report Number: M040411_Cert_Immobiliser

Test Sample: XD Smartra Immobiliser

Manufacturer: Robert Bosch (Australia) Pty Ltd

FCC ID: LXP-VIM223
Industry Canada ID: 2298A-VIM223
Equipment Type: Intentional Radiator

Tested for:

Address:

Robert Bosch (Australia) Pty Ltd
Cnr Centre & McNaughton Roads,
Clayton VIC 3168, Australia

Phone: + 61 3 9541 5555 **Fax:** + 61 3 9544 1137

Responsible Party: Peter Altis

Test Standards: FCC Part 15, Subpart C – Intentional Radiators

FCC Part 15.209: Radiated Emission Limits, General Requirements.

ANSI C63.4 – 2003 OET Bulletin No. 65

RSS-210 Issue 5 Low Power Licence-Exempt RadioCommunication Devices. 6.3: Restricted Bands and Unwanted Emission Frequencies

Test Date: 6th April 2004

Test Officers:

Chieu Huynh

B.Eng (Hons) Electronics

Kevin Hansen

Attestation: I hereby certify that the device(s) described herein were tested as

described in this report and that the data included is that which was

obtained during such testing.

Authorised Signatory: Chris Zombolas
Technical Director

EMC Technologies Pty Ltd



EMI TEST REPORT FOR CERTIFICATION to FCC PART 15.209 & RSS-210

1.0 INTRODUCTION

This report details the results of EMI tests and measurements performed on the XD Smartra Immobiliser.

Test results and procedures were performed in accordance with the following Federal Communications Commission (FCC) standards/regulations:

47 CFR, Part 15, Subpart C: Rules for intentional radiators (particularly section 15.209)

Section 15.203: Antenna requirements
Section 15.205: Restricted bands of operation
Section 15.207: Conducted Emission Limits

Section 15.209: Radiated Emission Limits, General Requirements

The test sample **complied** with the requirements of 47 CFR, Part 15 Subpart C - Section 15.209: Radiated Emission Limits, General Requirements

The test sample also complied with the Industry Canada RSS-210 issue 5 (Low Power Licence-Exempt Radiocommunication Devices (All Frequency Bands)) clause 6.3: Restricted Bands and Unwanted Emission Frequencies.

1.1 Summary of Results

FCC Part 15,	Industry Canada	Test Performed	Result
Subpart C	RSS-210		
Clauses	Clauses		
15.203	5.5	Antenna Requirement	Not Applicable
15.205	6.3	Operation in Restricted Band	Complies
15.207	6.6	Conducted Emissions	Not Applicable
15.209	6.3	Radiated Emissions	Complies

The measurement procedure used was in accordance with ANSI C63.4-2003 and OET Bulletin No. 65. The instrumentation conformed to the requirements of ANSI C63.2-1996.

1.2 Modifications by EMC Technologies

No modifications were required.

2.0 GENERAL INFORMATION

(Information supplied by the Client)

2.1 Product Details

Test Sample: XD Smartra Immobiliser

FCC ID: LXP-VIM223 Industry Canada ID: 2298A-VIM223

Equipment Type: Low Power Transmitter (Intentional Radiator)

2.2 Test Sample Operational Description

The immobiliser system consists of a passive challenge-response (mutual authentication) transponder inside the key head, the SMARTRA unit and an external antenna. The external antenna is mounted around the lock barrel. The SMARTRA communicates to a Control Unit (CU) via a dedicated communications line.

Refer to Appendix C for further details.

2.3 Test sample configuration

The EUT was powered by 12V DC power supply and was transmitting continuously on 125kHz during the tests.

Measurements were tested individually with both immobilisers (old variant and new variant) and with both modes (immobiliser "ON" and immobiliser "Idle"). All results are reported.

Refer to Appendix B - Test Setup Photographs.

2.4 Test Sample Block Diagram

Refer to Appendix D – Test Sample Block Diagram

2.5 Test Procedure

Emissions measurements were performed in accordance with the procedures of ANSI C63.4-2003. Radiated emissions tests were performed at a distance of 3 metres from the EUT. OET Bulletin 65 dated June 2001 was used for reference.

2.6 Test Facility

2.6.1 General

Radiated Emission measurements were performed at EMC Technologies open area test site (OATS) situated at Lerderderg Gorge, near the township of Bacchus Marsh in Victoria, Australia. Bandwidth measurements were performed at EMC Technologies' laboratory in Tullamarine, (Melbourne) Victoria Australia.

The above sites have been fully described in a report submitted to the FCC office, and accepted in a letter dated June 14, 2002, FCC Registration Number 90560.



2.6.2 NATA Accreditation

EMC Technologies is accredited in Australia to test to the following standards by the National Association of Testing Authorities (NATA).

"FCC Part 15 unintentional and intentional emitters in the frequency range 9kHz to 18 GHz excluding TV receivers (15.117 and 15.119), TV interface devices (15.115), cable ready consumer electronic equipment (15.118), cable locating equipment (15.213) and unlicensed national information infrastructure devices (Sub part E)."

The current full scope of accreditation can be found on the NATA website: www.nata.asn.au It also includes a large number of emission, immunity, SAR, EMR and Safety standards.

NATA is the Australian national laboratory accreditation body and has accredited EMC Technologies to operate to the IEC/ISO17025 requirements. A major requirement for accreditation is the assessment of the company and its personnel as being technically competent in testing to the standards. This requires fully documented test procedures, continued calibration of all equipment to the National Standard at the National Measurements Laboratory (NML) and an internal quality system to ISO 9002. NATA has mutual recognition agreements with the National Voluntary Laboratory Accreditation Program (NVLAP) and the American Association for Laboratory Accreditation (A²LA).

2.7 Units of Measurements

Radiated Emissions

Measurements are reported in units of dB relative to one microvolt per metre ($dB\mu V/m$).

2.8 Test Equipment Calibration

All measurement instrumentation and transducers were calibrated in accordance with the applicable standards by an independent NATA registered laboratory such as Agilent Technologies (Australia) Pty Ltd or the National Measurement Laboratory (NML). All equipment calibration is traceable to Australia national standards at the National Measurements Laboratory. The reference antenna calibration was performed by NML and the working antennas (loop, biconical and log-periodic) calibrated by the NATA approved procedures. The complete list of test equipment used for the measurements, including calibration dates and traceability is contained in Appendix A.

2.9 Ambients at OATS

The Open Area Test Site (OATS) is an area of low background ambient signals. No significant broadband ambients are present however commercial radio and TV signals exceed the limit in the FM radio, VHF and UHF television bands. Radiated prescan measurements were performed in the shielded enclosure to check for possible radiated emissions at the frequencies where the OATS ambient signals exceeded the test limit.

3.0 CONDUCTED EMISSION MEASUREMENTS

Not applicable, as EUT is battery powered.



4.0 RADIATED EMISSION MEASUREMENTS

4.1 Test Procedure

The immobiliser transmits continuously on 125 kHz. Testing was performed in accordance with the requirements of FCC Part 15.209 and table 7 of RSS-210.

Radiated emission measurements were performed to the limits as per section 15.209. The measurements were made at the open area test site at a distance of 3 metres.

The EUT was set up on the table top (placed on turntable) of total height 80 cm above the ground plane, and operated as described in section 2 of this report. The EMI Receiver was operated under software control via the PC Controller through the IEEE.488 Interface Bus Card Adaptor. The test frequency range was sub-divided into smaller bands with sufficient frequency resolution to permit reliable display and identification of possible EMI peaks while also permitting fast frequency scan times. A calibrated Loop antenna was used for measurements between 0.009 MHz to 30 MHz.

The measurement of emissions between 0.009 - 30 MHz was measured with the resolution bandwidth of 9 kHz and the video bandwidth of 30 kHz.

The EUT was slowly rotated with the Peak Detector set to Max-Hold. This was performed for two antenna heights. Each significant peak was then investigated and maximised with the Quasi-Peak detector. The measurement data for each frequency range was automatically corrected by the software for cable losses, antenna factors and preamplifier gain and all data was then stored on disk in sequential data files. This process was performed for both parallel and perpendicular antenna polarisations.

4.2 Plotting of Measurement Data for Radiated Emissions

The stored measurement data was combined to form a single graph which comprised of all the frequency sub-ranges over the range 0.009-30 MHz. The accumulated EMI (EUT ON) was plotted as the Red trace while the Ambient signals (AMBIENT) were plotted as Green trace. The worst case radiated EMI *peak* measurements as recorded using the Max-Hold data are presented as the upper or **RED** trace while the respective ambient signals are presented as the lower or **GREEN** trace. Occasionally, an intermittent ambient arose during the EUT ON measurement (RED trace) and could not be captured when the Ambient trace was being stored. The ambient peaks of significant amplitude with respect to the limit are tagged with the "#" symbol while EMI peaks are identified with a numeral. Ambient peaks that were present during the EUT ON measurement (RED trace) and not captured during the AMBIENT measurement were also tagged with the "#" symbol.

The highest recorded EMI signals are shown on the Peaks List on the bottom right side of the graph. For radiated EMI, each numbered peak is listed as a frequency, peak field strength, quasi-peak field strength and the margin relative to the limit in dB. A negative margin is the deviation of the recorded value below the limit.

At times, the quasi peak level may appear to be higher than the peak level. This happens because the individual peak is further maximised with the QP detector, after the peak trace is recorded. This will be apparent when the peaks list at the foot of the graphs shows the quasi peak level.



4.3 Calculation of Peak and Average Field Strength

The peak field strength was calculated automatically by the software using all the pre-stored calibration data. The method of calculation is shown below:

Where:

 \mathbf{E} = Radiated Peak Field Strength in dB μ V/m.

V = EMI Receiver Voltage in dBµV. (measured value)

AF = Antenna Factor in dB(m⁻¹). (stored as a data array)
G = Preamplifier Gain in dB. (stored as a data array)

L = Cable insertion loss in dB. (stored as a data array of Insertion Loss versus frequency)

• Example Peak Field Strength Calculation

Assuming a receiver reading of 44.0 dB μ V is obtained at 10 MHz, the Antenna Factor at that frequency is 9.9 dB and the cable loss is 0.5 dB while the preamplifier gain is 20 dB. The resulting Field Strength is therefore as follows:

$$44.0 + 9.9 + 0.5 - 20 = 34.4 \, dB_{\mu}V/m$$

4.4 Results - Fundamental and Spurious (0.009 to 30 MHz)

Measurements were tested individually with both immobilisers (old variant and new variant) and with both modes (immobiliser "ON" and immobiliser "Idle"). All results are reported below.

4.4.1 Old Variant - Immobiliser "ON"

Frequency MHz	Polarisation	Level Measured dBuV/m	Limit dBuV/m	Δ + dB
0.125	Parallel	74.9	105.5	-30.6
0.125	Perpendicular	69.5	105.5	-36.0

The highest radiated field strength emission complied with FCC limits by a margin of 30.6 dB at 0.125 kHz (transmitter fundamental). No harmonics or spurious emissions (0.009 to 30 MHz) were found within 20 dB of the limits. The measurement uncertainty for radiated field strength emissions was ±3.7 dB. Refer to Appendix G, graphs 1 and 2.

Results: Complies.

4.4.2 Old Variant - Immobiliser "Idle"

No emissions were found within 20 dB of the FCC limits. The measurement uncertainty for radiated field strength emissions was ±3.7 dB. Refer to Appendix G, graphs 3 and 4.

Results: Complies.



4.4.3 New Variant - Immobiliser "ON"

Frequency	Polarisation	Level Measured	Limit	Δ
MHz		dBμV/m	dBμV/m	\pm dB
0.125	Parallel	75.4	105.5	-30.1
0.125	Perpendicular	69.3	105.5	-36.2

The highest radiated field strength emission complied with FCC limits by a margin of 30.1 dB at 0.125 kHz (transmitter fundamental). No harmonics or spurious emissions were found within 20 dB of the limits. The measurement uncertainty for radiated field strength emissions was ± 3.7 dB. Refer to Appendix G, graphs 5 and 6.

Results: Complies.

4.4.4 New Variant - Immobiliser "Idle"

No emissions were found within 20 dB of the FCC limits. The measurement uncertainty for radiated field strength emissions was ±3.7 dB. Refer to Appendix G, graphs 7 and 8.

Results: Complies.

5. 0 ANTENNA REQUIREMENT

Testing to the requirements of FCC Part 15.203 was not applicable as this intentional radiator was designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device.

6.0 COMPLIANCE STATEMENT

The XD Smartra Immobiliser, tested on behalf of Robert Bosch (Australia) Pty Ltd, **complies** with the requirements of 47 CFR, Part 15 Subpart C - Rules for Radio Frequency Devices (intentional radiators), Section 15.209: Radiated Emission Limits, General Requirements.

The test sample also complies with the Industry Canada RSS-210 issue 5 (Low Power Licence-Exempt Radiocommunication Devices (All Frequency Bands)) clause 6.3: Restricted Bands and Unwanted Emission Frequencies.

Results were as follows:

FCC Part 15,	Industry Canada	Test Performed	Result
Subpart C	RSS-210		
Clauses	Clauses		
15.203	5.5	Antenna Requirement	Not Applicable
15.205	6.3	Operation in Restricted Band	Complies
15.207	6.6	Conducted Emissions	Not Applicable
15.209	6.3	Radiated Emissions	Complies

TEST REPORT APPENDICES

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