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

FCC ID: LXP-VIMA01  
Industry Canada ID: 2298A-VIMA01

Test Sample: Smartra III Immobiliser

Tested for: Robert Bosch Australia

Report Number: M070149\_Cert\_Immobiliser

Issue Date: 26<sup>th</sup> March 2007

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NATA Accredited Laboratory Number: 5292

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**to**  
**FCC PART 15.209 & RSS-210**

**Report Number:** M070149\_Cert\_Immobiliser

**Test Sample:** Smartra III Immobiliser

**Manufacturer:** Robert Bosch (Australia) Pty Ltd

**FCC ID:** LXP-VIMA01  
**Industry Canada ID:** 2298A-VIMA01  
**Equipment Type:** Intentional Radiator

**Tested for:** Robert Bosch (Australia) Pty Ltd  
**Address:** Cnr Centre & McNaughton Roads,  
Clayton VIC 3168, Australia  
**Phone:** + 61 3 9541 5555  
**Fax:** + 61 3 9544 1137  
**Contact:** James Lowe

**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 Dates:** 5<sup>th</sup> February – 16<sup>th</sup> March 2007

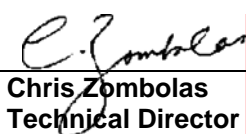
**Test Officers:** 

**Kevin Hansen**



**Pat Sinni**

**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**



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## 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 Smartra III Immobiliser

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

|                                    |   |
|------------------------------------|---|
| <b>47 CFR, Part 15, Subpart C:</b> | Rules for intentional radiators (particularly section 15.209) |
| <b>Section 15.203:</b>             | Antenna requirements  |
| <b>Section 15.205:</b>             | Restricted bands of operation                                 |
| <b>Section 15.207:</b>             | Conducted Emission Limits                                     |
| <b>Section 15.209:</b>             | 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, Subpart C Clauses | Industry Canada RSS-210 Clauses | Test Performed               | Result                |
|--------------------------------|---------------------------------|------------------------------|-----------------------|
| 15.203                         | 5.5                             | Antenna Requirement          | <b>Not Applicable</b> |
| 15.205                         | 6.3                             | Operation in Restricted Band | <b>Complies</b>       |
| 15.207                         | 6.6                             | Conducted Emissions          | <b>Not Applicable</b> |
| 15.209                         | 6.3                             | Radiated Emissions           | <b>Complies</b>       |

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

|                            |  |
|----------------------------|--|
| <b>Test Sample:</b>        | Smartra III Immobiliser                      |
| <b>FCC ID:</b>             | LXP-VIMA01                                   |
| <b>Industry Canada ID:</b> | 2298A-VIMA01                                 |
| <b>Equipment Type:</b>     | Low Power Transmitter (Intentional Radiator) |



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## 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 E for further details.

## 2.3 Test sample configuration

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

Measurements were tested in two modes (immobiliser "ON" and immobiliser "Idle") for the frequency range of 9 kHz 30 MHz. All results are reported.

Refer to Appendix B - Test Setup Photographs.

## 2.4 Test Sample Block Diagram

Refer to Appendix C – 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 for the frequency band above 30 MHz and EMC Technologies' laboratory in Tullamarine, (Melbourne) Victoria Australia for the frequency band below 30 MHz.

The above sites have been fully described in a report submitted and accepted by the FCC - **FCC Registration Number 90560.**

EMC Technologies open area test site (OATS) has also been accepted by Industry Canada for the performance of radiated measurements in accordance with RSS 212, Issue 1 (Provisional). **Industry Canada File Number IC 4161.**



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## 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](http://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 (A<sup>2</sup>LA).

## 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.



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## 4.0 RADIATED EMISSION MEASUREMENTS

### 4.1 Test Procedure

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. A calibrated Biconical antenna was used for measurements between 30 MHz to 232 MHz and a calibrated Logperiodic antenna used for measurements between 230 MHz to 1000 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 measurement of emissions between 30 - 1000 MHz was measured with the resolution bandwidth of 120 kHz and the video bandwidth of 300 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 and 30-1000 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:

$$E = V + AF - G + L$$

Where:

- E** = Radiated Peak Field Strength in dB $\mu$ V/m.
- V** = EMI Receiver Voltage in dB $\mu$ V. (measured value)
- AF** = Antenna Factor in dB(m<sup>-1</sup>). (stored as a data array)
- G** = Preamplifier Gain in dB. (stored as a data array)
- L** = Cable 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 $\mu$ 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:

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

### 4.4 Results

#### Immobiliser - Fundamental and Spurious (0.009 to 1000 MHz)

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.

The highest radiated field strength emission complied with FCC limits by a margin of greater than 20 dB at 0.125 kHz (transmitter fundamental). Spurious emissions (0.009 to 1000 MHz) were found to comply with FCC limits by a margin of 7.6 dB. The measurement uncertainty for radiated field strength emissions was  $\pm 3.7$  dB. Refer to Appendix G, graphs 1 to 4.

**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 Smartra III Immobiliser, tested on behalf of Robert Bosch (Australia) Pty Ltd, **complied** 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 **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.

**Results were as follows:**

**Immobiliser:**

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



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## TEST REPORT APPENDICES

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