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Measured Radio Frequency Emissions From

Continental Automotive Systems US Inc. Transmitter FCC ID: M3N32297200 IC: 7812A-32297200

Test Report No. 417124-622 March 30, 2012

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Summary

Tests for compliance with FCC Regulations, CFR 47, Part 15 and with Industry Canada RSS-210/Gen, were performed on a Continental, FCC ID: M3N32297200, IC: 7812A-32297200. This device under test (DUT) is subject to the rules and regulations as a Transmitter.

In testing completed on February 10, 2012, the DUT tested met the allowed specifications for radiated emissions by 35.7 dB. AC Mains conducted emissions are not subject to regulation as the DUT is powered by a 12 VDC vehicular system.

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1. Introduction

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

2. Equipment Used

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

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

Table 2.1 Test Equipment.

3. Device Under Test

3.1 Description & Block Diagram

The DUT is a 125 kHz Transmitter designed for automotive/vehicular applications, and as such it is powered by a 12 VDC vehicular system. The device is housed in a plastic case approximately 2 x 2 x 3 inches in dimension. For testing, a generic harness was provided by the manufacturer. The DUT is designed and manufactured by Continental Automotive Systems US Inc., 2400 Executive Hills Drive Auburn Hills Michigan 48326-2980.

Device	[Make], Model	[S/N],P/N	EMC Consideration		
DUT	Continental	56046803AD	LF Immobilizer Transmitter		

3.2 Variants & Samples

The DUT is an Ignition Node Module (IGNM) that interfaces with a remote keyless entry transmitter (FOBIK) with built in immobilizer transponder. There is only a single variant of the DUT, as tested. One sample of the device was provided for testing along with a harness and control box.

3.3 Modes of Operation

The DUT is capable only of a single mode of operation, as a LF transponder initiator.

3.4 Exemptions

The DUT is permanently installed in a transportation vehicle. As such, digital emissions are exempt (per FCC 15.103(a) and IC correspondence on ICES-003) from regulation.

3.5 EMC Relevant Modifications

No EMI Relevant Modifications were performed by this test laboratory.

4. Emissions Limits

4.1 Radiated Emissions Limits

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

Table 4.1. Transmitter Radiated Emission Limits	(FCC: 15.205, 15.35; IC: RSS-210, 2.6 Tab. 1,3)
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Freque	ncy (MHz)	Fundamental and Spurious* (µV/m)		
0.00	9-0.490	2400/F(kHz), 300m		
0.49	00-1.705	24,000/F(kHz), 30m		
0.090-0.110 0.49-0.51 2.1735-2.190 3.020-3.026 (IC) 4.125-4.128 4.17725-4.17775 4.20725-4.20775 5.677-5.683 (IC) 6.215-6.218 6.26775-6.26825 6.31175-6.31225	$\begin{array}{r} 8.291 \hbox{-} 8.294 \\ 8.37625 \hbox{-} 8.38675 \\ 8.41425 \hbox{-} 8.41475 \\ 12.29 \hbox{-} 12.293 \\ 12.51975 \hbox{-} 12.52025 \\ 12.57675 \hbox{-} 12.57725 \\ 13.36 \hbox{-} 13.41 \\ 16.42 \hbox{-} 16.423 \\ 16.69475 \hbox{-} 16.69525 \\ 16.80425 \hbox{-} 16.80475 \\ 25.5 \hbox{-} 25.67 \\ \end{array}$	Restricted Bands		

* Harmonics must be below the fundamental. To translate measurements to the 300/30 m distance, we refer to the journal paper: "Extrapolating Near-Field Emissions of Low-Frequency Loop Transmitters," J. D. Brunett, V. V. Liepa, D. L. Sengupta, IEEE Trans. EMC, Vol. 47, No. 3, August 2005.

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

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

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

Power Line Conducted Emissions Limits

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

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

Notes:

1. The lower limit shall apply at the transition frequency

2. The limit decreases linearly with the logarithm of the frequency in the range 0.15-0.50 MHz: *Class B Quasi-peak: $dB\mu V = 50.25 - 19.12*\log(f)$ *Class B Average: $dB\mu V = 40.25 - 19.12*\log(f)$

3. 9 kHz RBW

5. Measurement Procedures

5.1 Semi-Anechoic Chamber Radiated Emissions

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

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

5.2 Outdoor Radiated Emissions

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

5.3 Radiated Field Computations

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

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

where

- PR = power recorded on spectrum analyzer, dBm, measured at 3 m
 - KA = antenna factor, dB/m

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

- KE = duty correction factor, dB
- CF = distance conversion (employed only if limits are specified at alternate distance), dB

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

5.4 Indoor Power Line Conducted Emissions

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

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

5.5 Supply Voltage Variation

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

6. Test Results

6.1 Radiated Emissions

6.1.1 Correction for Pulse Operation

When the transmitter is activated by the user (vehicle start button is pressed) it will look for the presence of an LF transponder by transmitting 5 CW frames of LF. Frames are spaced 140 ms apart, with the longest frame length of 90 ms. If a transponder is found (key fob is inserted) the DUT will transmit only one 125 ms long CW frame, since this is longer than the 100 ms window over which a duty cycle is computed, no duty cycle is employed for this product. See Figure 6.1.

6.2 Emission Spectrum

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

6.2.1 Emission Bandwidth

The emission bandwidth of the signal is shown in Figure 6.3. From the plot we see that the 99% bandwidth 14.92 kHz. The emission is more than 26 dBc in the 110 kHz restricted band.

6.2.2 Supply Voltage and Supply Voltage Variation

The DUT has been designed to be powered by a 12 VDC battery. For this test, relative radiated power was measured at the fundamental as the voltage was varied from 6.0 to 18.0 volts. The emission variation is shown in Figure 6.4.

Supply Voltage	V	=	12.0 V
Current	Ι	=	110 mA (pulsed)

6.3 Conducted Emissions

These tests do not apply, since the DUT is powered from a 12 VDC system.

6.4 Field Behavior at 125 kHz

Because at the specified 300/30 m measurement distance the signal-to-noise (SNR) ratio of the test receiver is insufficient, measurements were made at 3 m (or 10 m). To translate the measurement to the 300/30 m distance, we refer to the journal paper: *Extrapolating Near-Field Emissions of Low-Frequency Loop Transmitters*, J. D. Brunett, V. V. Liepa, D. L. Sengupta, IEEE Trans. EMC, Vol. 47, No. 3, August 2005. The applicable worst-case field conversion tables are included here for reference, and are derived from data measured at the OAT Site used in this filing.

Limit Location:	300	(m)	Limit Location:	30	(m)
Meas. Distance:	3 (m)	10 (m)	Meas. Distance:	3 (m)	10 (m)
Frequency	CF	CF	Frequency (MHz)	CF (dB)	CF (dB)
(kHz)	(dB)	(dB)	Frequency (MITZ)		CF (ub)
9.0	116.7	81.8	0.490	56.4	9.6
10.6	116.7	81.8	0.582	56.2	11.1
12.6	116.7	81.8	0.690	56.0	12.9
14.8	116.7	81.8	0.820	55.7	15.0
17.5	116.6	81.9	0.973	55.4	17.3
20.7	116.6	81.9	1.155	54.9	19.5
24.4	116.6	81.9	1.371	54.4	20.8
28.9	116.6	82.0	1.627	53.7	21.0
34.1	116.5	82.0	1.931	52.9	20.5
40.3	116.4	82.1	2.292	52.0	19.8
47.6	116.3	82.2	2.721	49.8	19.1
56.2	116.2	82.4	3.230	46.6	15.8
66.4	116.0	82.6	3.834	43.3	12.7
78.4	115.8	82.9	4.551	40.1	10.3
92.7	115.4	83.1	5.402	36.8	9.0
109.4	115.0	83.4	6.412	33.5	8.5
129.3	114.5	83.3	7.612	30.3	8.5
152.7	113.9	82.6	9.035	27.0	8.6
180.4	113.1	81.0	10.725	23.9	8.8
213.1	112.2	78.7	12.730	21.2	9.0
251.7	111.3	76.0	15.111	19.3	9.1
297.3	108.3	73.3	17.937	18.4	9.2
351.2	105.2	70.8	21.292	18.2	9.3
414.8	102.1	68.4	25.274	18.3	9.3
490.0	99.1	66.3	30.000	18.4	9.4

In the data table, Table 6.1, the measured field is decreased by the dB values given above to represent the field at 300m or 30m, whichever is applicable.

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Radiated Emission - LF Conti, IGNM LF										Conti, IGNM LF Tx; FCC/IC		
	Freq. Ant. Ant. Pr, 3m Det. Ka Kg Conv.** E* Elim Pass											
#	kHz	Used	Orien.	dBm	Used	dB/m	dB	3/30/300 m	dBµV/m	$dB\mu V/m$	dB	Comments
1	125.0	Loop	V/perp	-33.3	Pk	9.9	0.0	114.8	-31.2	25.7	56.9	loop perp. (axis in dir. of prop.)
2	125.0	Loop	V/par	-33.0	Pk	9.9	0.0	114.8	-30.9	25.7	56.6	loop paral. (loop in dir. of prop.
3	125.0	Loop	Н	-36.6	Pk	9.9	0.0	114.8	-34.5	25.7	60.2	loop horiz. (loop in horiz. plane
4	250.0	Loop	V/perp	-67.0	Pk	9.8	0.0	110.4	-60.6	19.6	80.2	loop perp. (noise)
5	250.0	Loop	V/par	-66.2	Pk	9.8	0.0	110.4	-59.8	19.6	79.4	loop paral. (noise)
6	250.0	Loop	Н	-67.3	Pk	9.8	0.0	110.4	-60.9	19.6	80.5	loop horiz. (noise)
7	375.0	Loop	V/perp	-66.2	Pk	9.8	0.0	104.5	-53.9	16.1	70.0	loop perp.
8	375.0	Loop	V/par	-66.5	Pk	9.8	0.0	104.5	-54.2	16.1	70.3	loop paral.
9	375.0	Loop	Н	-68.2	Pk	9.8	0.0	104.5	-55.9	16.1	72.0	loop horiz.
10	500.0	Loop	All	-72.9	Pk	9.8	0.0	56.3	-12.4	33.6	46.0	noise
11	625.0	Loop	All	-73.2	Pk	9.8	0.0	56.1	-12.5	31.7	44.2	max all
12	750.0	Loop	All	-67.9	Pk	9.8	0.0	55.9	- 7.0	30.1	37.1	noise
13	875.0	Loop	All	-76.7	Pk	9.8	0.0	55.6	-15.5	28.8	44.3	max all
14	1000.0	Loop	All	-74.0	Pk	9.8	0.0	55.4	-12.6	27.6	40.2	background
15	1125.0	Loop	All	-70.8	Pk	9.8	0.0	55.1	- 9.1	26.6	35.7	noise
16	1250.0	Loop	All	-76.4	Pk	9.8	0.0	54.8	-14.4	25.7	40.0	background
17												
18												
19												
20												
21												
22	* Averag	ging app	olies up	to 490 k	Hz, 0.0	dB em	ployed	l in this case				
23	Limit a	at 300m	for f<0.	.490MH	z; 30m	for f>0).490M	IHz				
24						<u> </u>		trapolation refe	erence.			
25	9 kHz	RBW f	or $f \ge 1$	50 kHz	, 200 H	z for f	< 150 l	kHz				
	** Repre	esents th	ne worst	case co	nversio	n facto	r for al	l possible orier	ntations and	l ground m	aterials	
27												
28												
					0			nissions*			-	
	Freq.	Ant.	Ant.	Pr	Det.	Ka	Kg		E3	E3lim	Pass	
#	kHz	Used	Pol.	dBm	Used	dB/m	dB		dBµV/m	$dB\mu V\!/\!m$	dB	Comments
1												
2												
3												
4												
5												
6												
7												
8												
9	9 * For devices used in transportation vehicles, digital emissions are exempt from FCC regulations per FCC 15.103(a)											

Table 6.1 Highest Emissions Measured

Meas. 02/10/2012; U of Mich.

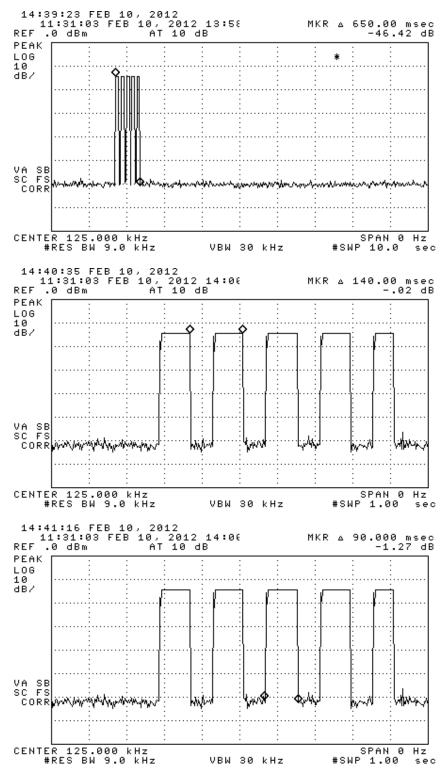


Figure 6.1(a). No Key Transmission characteristics. (top) complete interrogation, (center) frame period, (bottom) maximum frame length.

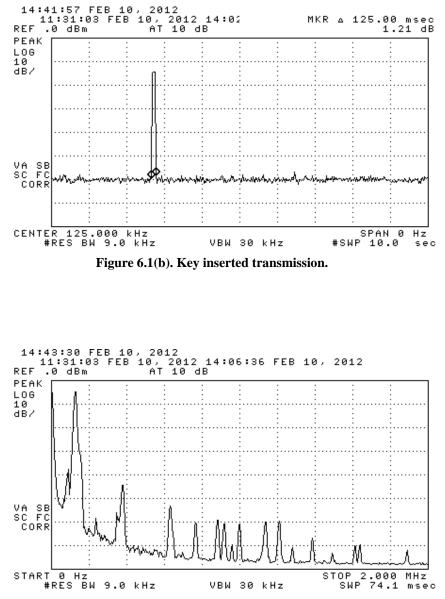


Figure 6.2. Emission spectrum of the DUT (pulsed emission). Amplitudes are only indicative (not calibrated).

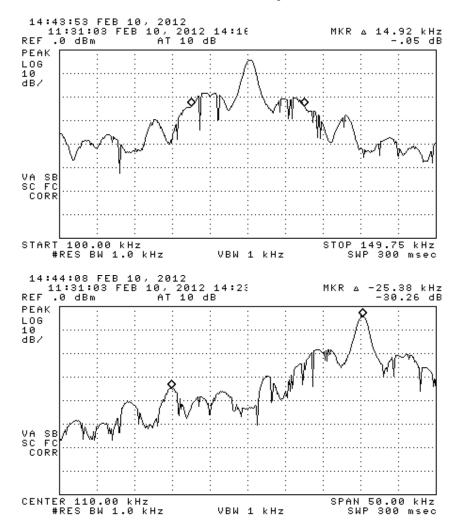
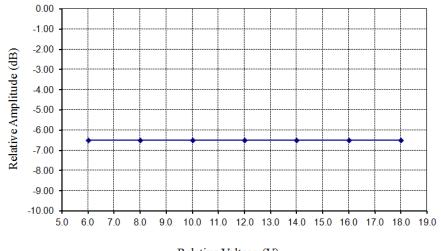


Figure 6.3. Measured emission bandwidth of the DUT (pulsed).



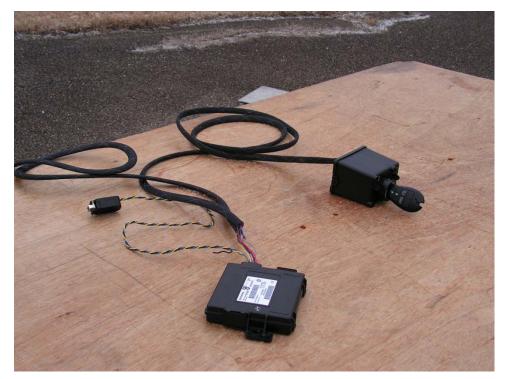
Relative Voltage (V)

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

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



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