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April 26, 2019

Polycom Inc.  
6001 America Center Drive  
San Jose, CA 95002

Dear Tony Griffiths,

Enclosed is the EMC Wireless test report for compliance testing of the Polycom Inc., P011 as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15 Subpart C for Intentional Radiators.

Thank you for using the services of Eurofins MET Labs. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,  
EUROFINS MET LABS

A handwritten signature in black ink that reads "Jennifer Warnell". The signature is written in a cursive, flowing style.

Jennifer Warnell  
Documentation Department

Reference: (\\Polycom Inc.\\EMCA102119B-FCC247 DTS BLE)

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## Electromagnetic Compatibility Criteria Test Report

for the

**Polycom Inc.**  
**P011**

**Tested under**  
the FCC Certification Rules  
contained in  
15.247 Subpart C for Intentional Radiators

**MET Report: EMCA102119B-FCC247 DTS BLE**

April 26, 2019

**Prepared For:**

**Polycom Inc.**  
**6001 America Center Drive**  
**San Jose, CA 95002**

**Prepared By:**  
**Eurofins MET Labs**  
914 W. Patapsco Ave.  
Baltimore, MD 21230

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Giuliano Messina, Project Engineer  
Electromagnetic Compatibility Lab



Jennifer Warnell  
Documentation Department

**Engineering Statement:** The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Part 15.247 under normal use and maintenance.



Jonathan Tavira,  
Manager, Austin Electromagnetic Compatibility Lab

### Report Status Sheet

Revision	Report Date	Reason for Revision
∅	April 26, 2019	Initial Issue.

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## List of Terms and Abbreviations

<b>AC</b>	<b>Alternating Current</b>
<b>ACF</b>	<b>Antenna Correction Factor</b>
<b>Cal</b>	<b>Calibration</b>
<i>d</i>	<b>Measurement Distance</b>
<b>dB</b>	<b>Decibels</b>
<b>dB<math>\mu</math>A</b>	<b>Decibels above one microamp</b>
<b>dB<math>\mu</math>V</b>	<b>Decibels above one microvolt</b>
<b>dB<math>\mu</math>A/m</b>	<b>Decibels above one microamp per meter</b>
<b>dB<math>\mu</math>V/m</b>	<b>Decibels above one microvolt per meter</b>
<b>DC</b>	<b>Direct Current</b>
<b>E</b>	<b>Electric Field</b>
<b>DSL</b>	<b>Digital Subscriber Line</b>
<b>ESD</b>	<b>Electrostatic Discharge</b>
<b>EUT</b>	<b>Equipment Under Test</b>
<i>f</i>	<b>Frequency</b>
<b>FCC</b>	<b>Federal Communications Commission</b>
<b>GRP</b>	<b>Ground Reference Plane</b>
<b>H</b>	<b>Magnetic Field</b>
<b>HCP</b>	<b>Horizontal Coupling Plane</b>
<b>Hz</b>	<b>Hertz</b>
<b>IEC</b>	<b>International Electrotechnical Commission</b>
<b>kHz</b>	<b>kilohertz</b>
<b>kPa</b>	<b>kilopascal</b>
<b>kV</b>	<b>kilovolt</b>
<b>LISN</b>	<b>Line Impedance Stabilization Network</b>
<b>MHz</b>	<b>Megahertz</b>
<b><math>\mu</math>H</b>	<b>microhenry</b>
<b><math>\mu</math></b>	<b>microfarad</b>
<b><math>\mu</math>s</b>	<b>microseconds</b>
<b>NEBS</b>	<b>Network Equipment-Building System</b>
<b>PRF</b>	<b>Pulse Repetition Frequency</b>
<b>RF</b>	<b>Radio Frequency</b>
<b>RMS</b>	<b>Root-Mean-Square</b>
<b>TWT</b>	<b>Traveling Wave Tube</b>
<b>V/m</b>	<b>Volts per meter</b>
<b>VCP</b>	<b>Vertical Coupling Plane</b>



# I. Executive Summary

**A. Purpose of Test**

An EMC evaluation was performed to determine compliance of the Polycom Inc. P011, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the P011. Polycom Inc. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the P011, has been **permanently** discontinued.

**B. Executive Summary**

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with Polycom Inc., purchase order number 6090003000. All tests were conducted using measurement procedures ANSI C63.4-2014 and ANSI C63.10-2013.

FCC Reference 47 CFR Part 15.247:2005	Description	Compliance
Title 47 of the CFR, Part 15 §15.203	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	Conducted Emission Limits	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(2)	6dB Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	Peak Power Output	Compliant
Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205	Radiated Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RF Conducted Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RF Conducted Band Edge	Compliant
Title 47 of the CFR, Part 15; §15.247(e)	Peak Power Spectral Density	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	Maximum Permissible Exposure (MPE)	Compliant

**Table 1. Executive Summary of EMC Part 15.247 Compliance Testing**

## II. Equipment Configuration

## A. Overview

Eurofins MET Labs was contracted by Polycom Inc. to perform testing on the P011, under Polycom Inc.’s purchase order number 6090003000.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Polycom Inc., P011.

The results obtained relate only to the item(s) tested.

<b>Model(s) Tested:</b>	P011		
<b>Model(s) Covered:</b>	P011		
<b>EUT Specifications:</b>	Primary Power: 120VAC		
	FCC ID: M72-P011		
	Type of Modulations:	GFSK	
	Equipment Code:	DTS	
	Peak RF Output Power:	-0.111 dBm	
	EUT Frequency Ranges:	2402-2480 MHz	
<b>Analysis:</b>	The results obtained relate only to the item(s) tested.		
<b>Environmental Test Conditions:</b>	Temperature: 15-35° C		
	Relative Humidity: 30-60%		
	Barometric Pressure: 860-1060 mbar		
<b>Evaluated by:</b>	Giuliano Messina		
<b>Report Date(s):</b>	April 26, 2019		

**Table 2. EUT Summary Table**

## B. References

<b>CFR 47, Part 15, Subpart C</b>	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
<b>ANSI C63.4:2014</b>	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
<b>ISO/IEC 17025:2017</b>	General Requirements for the Competence of Testing and Calibration Laboratories
<b>ANSI C63.10-2013</b>	American National Standard for Testing Unlicensed Wireless Devices

**Table 3. References**

**C. Test Site**

All testing was performed at Eurofins MET Labs, 13501 McCallen Pass, Austin, TX 78753. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 10 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

**D. Measurement Uncertainty**

Test Method	Typical Expanded Uncertainty	K	Confidence Level
RF Frequencies	±4.52 Hz	2	95%
RF Power Conducted Emissions	±2.97 dB	2	95%
RF Power Radiated Emissions	±2.95 dB	2	95%

Table 4. Uncertainty Calculations Summary

**E. Description of Test Sample**

The Polycom Inc. P011, Equipment Under Test (EUT), is a video CODEC with Wi-Fi and Bluetooth functions. It is intended to be used in enterprise environments.



Photograph 1. Polycom Inc. P011

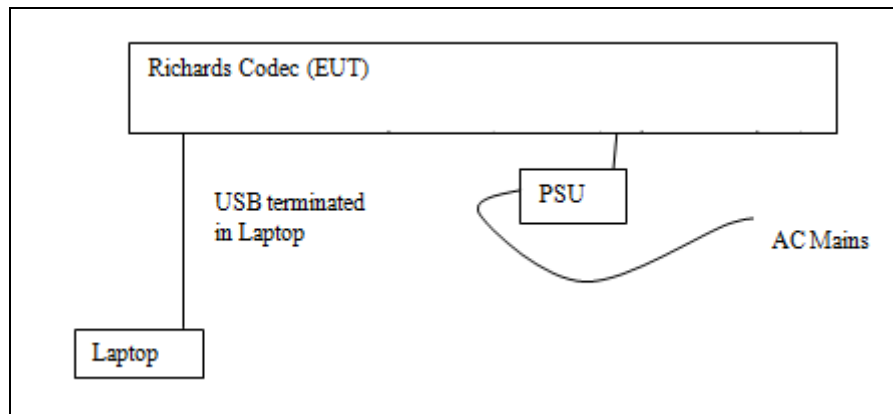


Figure 1. Block Diagram of Test Configuration

### F. Equipment Configuration

The EUT was set up as outlined in Figure 1, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

Ref. ID	Name / Description	Model Number	Part Number	Serial Number	Revision
1	P011 CODEC	--	2201-85340-001	8219024D0080F2	--

Table 5. Equipment Configuration

### G. Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

Ref. ID	Name / Description	Manufacturer	Model Number	Customer Supplied Calibration Data
1	PSU	Sparkle FSP180-AWAN3	9NA1804503	--
2	Laptop	ASUS	X200M	--

Table 6. Support Equipment

### H. Ports and Cabling Information

Ref. ID	Port name on EUT	Cable Description or reason for no cable	Qty	Length as tested (m)	Max Length (m)	Shielded ? (Y/N)	Termination Box ID & Port Name
1	DC In	--	1	--	--	N	DC In
2	USB Type C	USB	1	--	--	--	Control system from laptop

Table 7. Ports and Cabling Information

**I. Mode of Operation**

The support laptop provided a direct means of controlling transmitter parameters.

**J. Method of Monitoring EUT Operation**

A spectrum analyzer was used to confirm proper transmitter operation.

**K. Modifications**

**a) Modifications to EUT**

No modifications were made to the EUT.

**b) Modifications to Test Standard**

No modifications were made to the test standard.

**L. Disposition of EUT**

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Polycom Inc. upon completion of testing.

### **III. Electromagnetic Compatibility Criteria for Intentional Radiators**



## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.203 Antenna Requirement

**Test Requirement:** § 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

**Results:** The EUT as tested is compliant the criteria of §15.203. The TX antenna is not accessible by the end user.

**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/07/19

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.207(a) Conducted Emissions Limits

**Test Requirement(s):** § 15.207 (a): For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30MHz, shall not exceed the limits in the following table, as measured using a 50  $\mu$ H/50  $\Omega$  line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB $\mu$ V)	
	Quasi-Peak	Average
0.15-0.5	66 - 56	56 - 46
0.5-5	56	46
5-30	60	50

**Table 8. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)**

**Test Procedure:** The EUT was placed on a 0.8 m-high wooden table. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50  $\Omega$ /50  $\mu$ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with ANSI C63.4-2014 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz". The measurements were performed using a 50  $\Omega$ /50  $\mu$ H LISN as the input transducer to an EMI receiver. For the purpose of this testing, the transmitter was turned on.

**Test Results:** The EUT was compliant with this requirement.

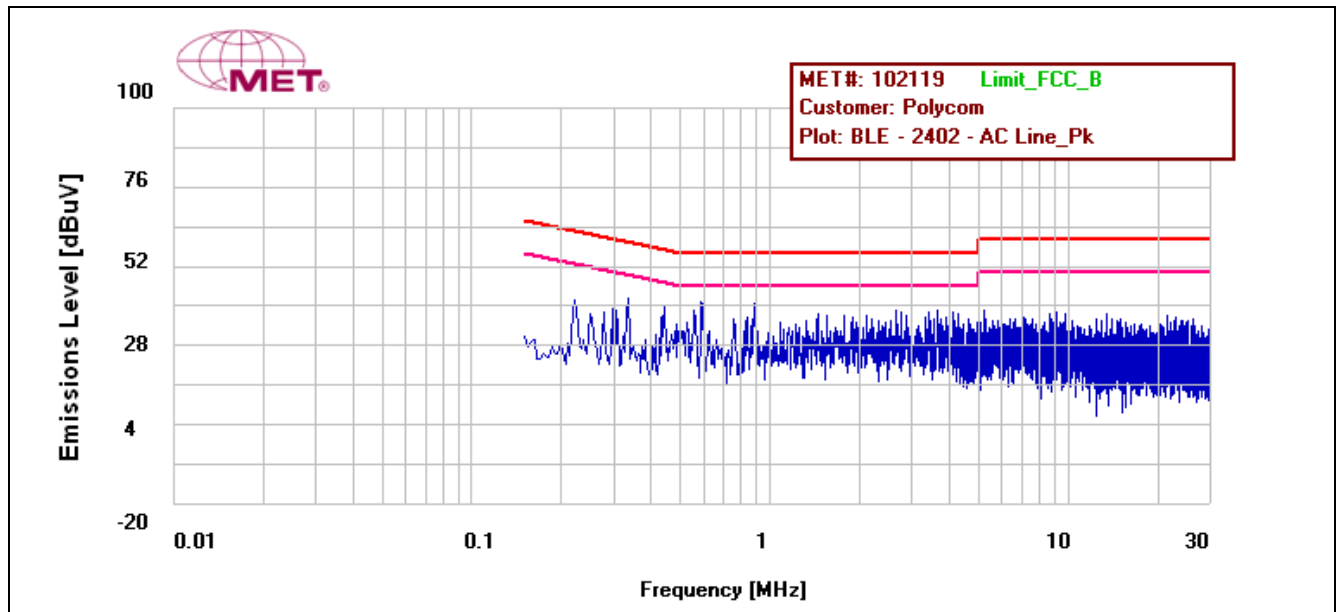
**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/19/19

**15.207(a) Conducted Emissions Test Results**

Line	Freq. (MHz)	QP Amplitude	QP Limit	Delta	Pass	Average Amplitude	Average Limit	Delta	Pass
BLE - 2402 - AC Line	0.222	41.1	62.753	-21.653	Pass	33.5	52.753	-19.253	Pass
BLE - 2402 - AC Line	0.334	41.3	59.369	-18.069	Pass	35.2	49.369	-14.169	Pass
BLE - 2402 - AC Line	0.590	37.8	56	-18.2	Pass	28.9	46	-17.1	Pass
BLE - 2402 - AC Line	0.890	40.2	56	-15.8	Pass	34	46	-12	Pass
BLE - 2402 - AC Line	2.674	36.4	56	-19.6	Pass	28.1	46	-17.9	Pass
BLE - 2402 - AC Line	3.674	37.1	56	-18.9	Pass	30	46	-16	Pass

**Table 9. Conducted Emissions, 15.207(a), Phase Line, Test Results**

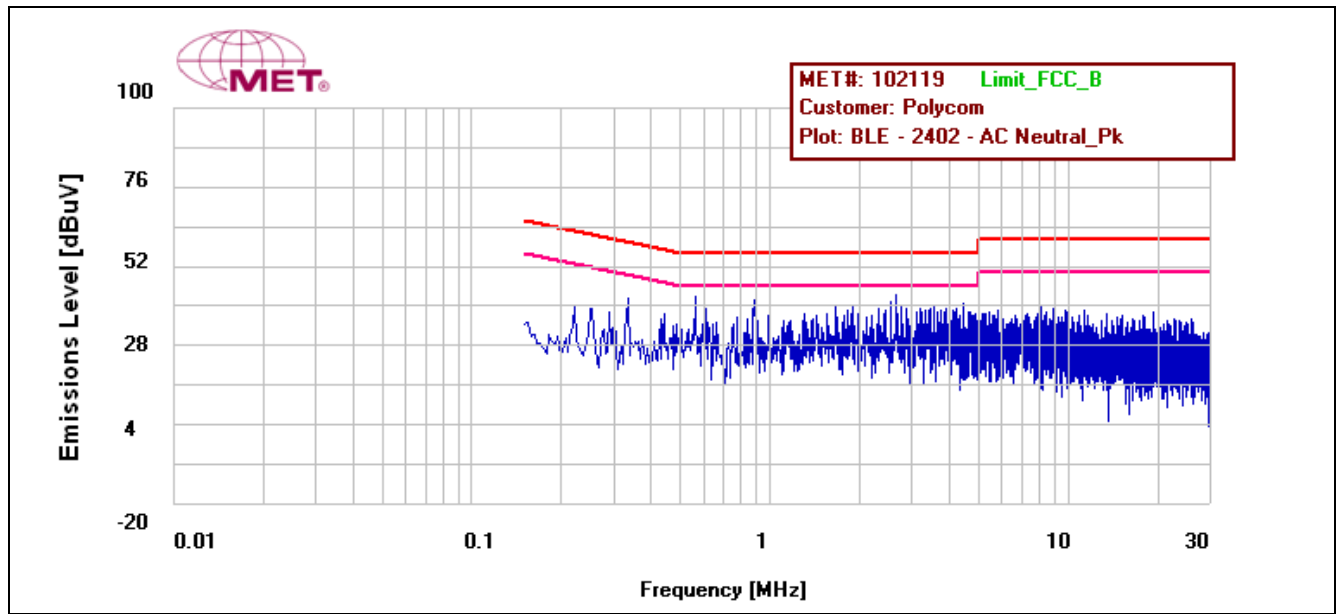


**Plot 1. Conducted Emissions, 15.207(a), Phase Line**

**15.207(a) Conducted Emissions Test Results**

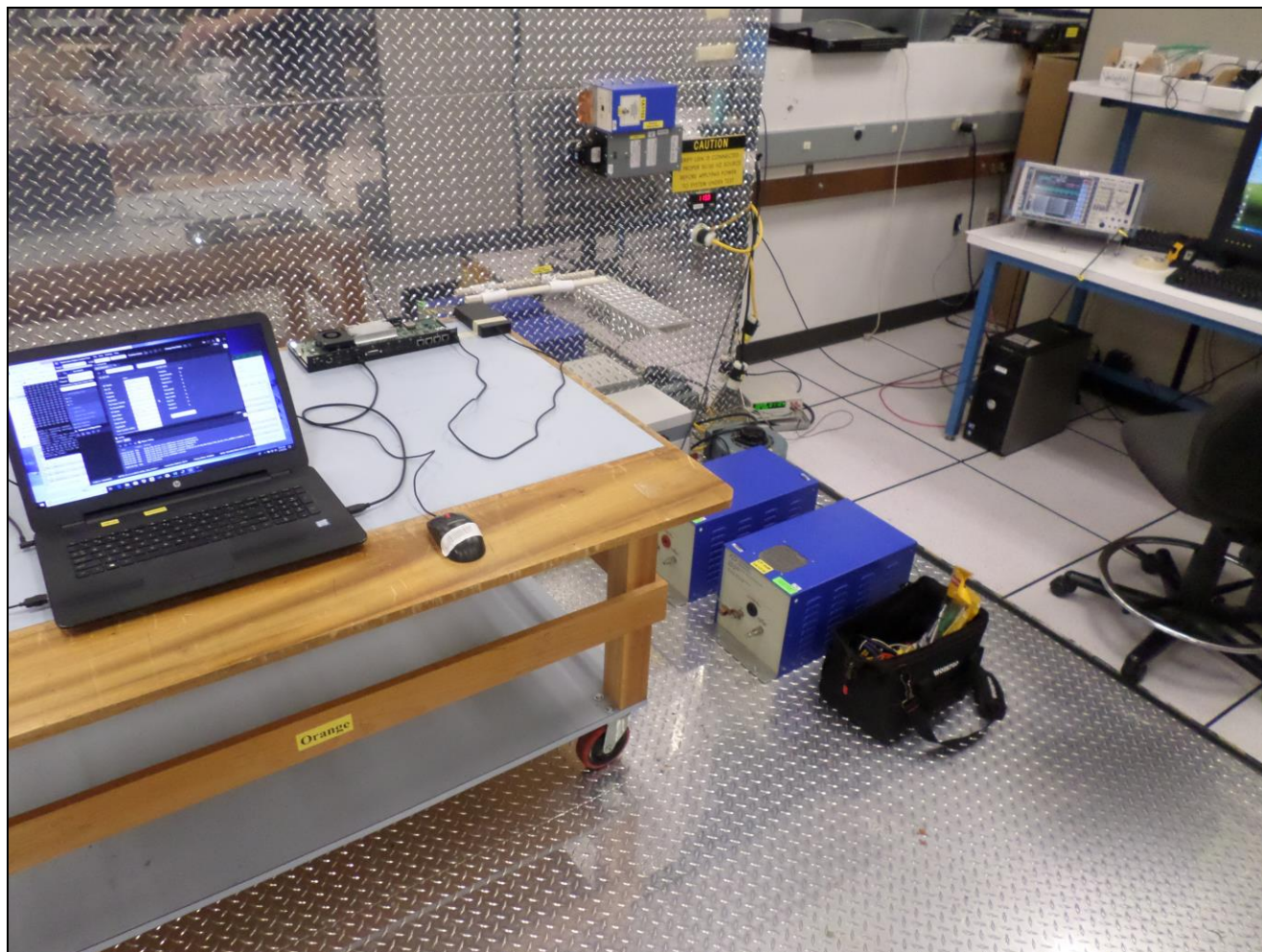
Line	Freq. (MHz)	QP Amplitude	QP Limit	Delta	Pass	Average Amplitude	Average Limit	Delta	Pass
BLE - 2402 - AC Neutral	0.334	41.4	59.369	-17.969	Pass	34.9	49.369	-14.469	Pass
BLE - 2402 - AC Neutral	0.562	40.2	56	-15.8	Pass	33.2	46	-12.8	Pass
BLE - 2402 - AC Neutral	0.890	41.9	56	-14.1	Pass	35.7	46	-10.3	Pass
BLE - 2402 - AC Neutral	2.554	39.1	56	-16.9	Pass	30.4	46	-15.6	Pass
BLE - 2402 - AC Neutral	2.662	39.1	56	-16.9	Pass	30.1	46	-15.9	Pass
BLE - 2402 - AC Neutral	4.454	37.3	56	-18.7	Pass	30.3	46	-15.7	Pass

**Table 10. Conducted Emissions, 15.207(a), Neutral Line, Test Results**



**Plot 2. Conducted Emissions, 15.207(a), Neutral Line**

### 15.207(a) Conducted Emissions Test Setup Photo



Photograph 2. Conducted Emissions, 15.207(a), Test Setup

**Electromagnetic Compatibility Criteria for Intentional Radiators**

**§ 15.247(a)(2) 6 dB Bandwidth**

**Test Requirements:** § 15.247(a)(2): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

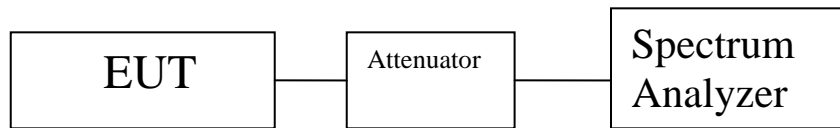
**Test Procedure:** The transmitter was on and transmitting at the highest output power. The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately 1% of the total emission bandwidth, VBW > RBW. The 6 dB Bandwidth was measured and recorded. The measurements were performed on the low, mid and high channels.

**Test Results** The EUT was compliant with § 15.247 (a)(2).

The 6 dB Bandwidth was determined from the plots on the following pages.

**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/07/19

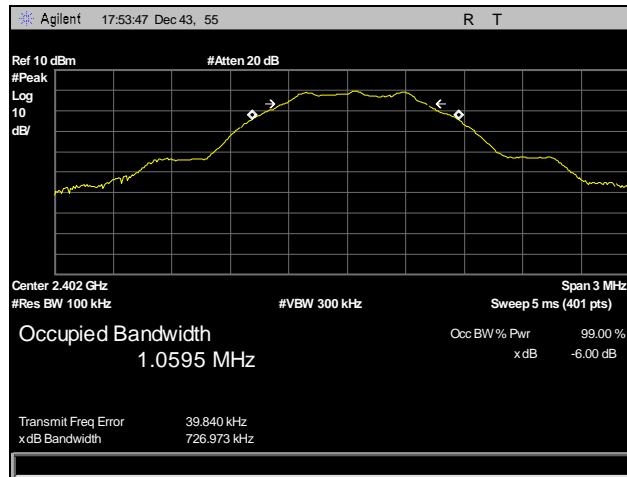


**Figure 2. Block Diagram, Occupied Bandwidth Test Setup**

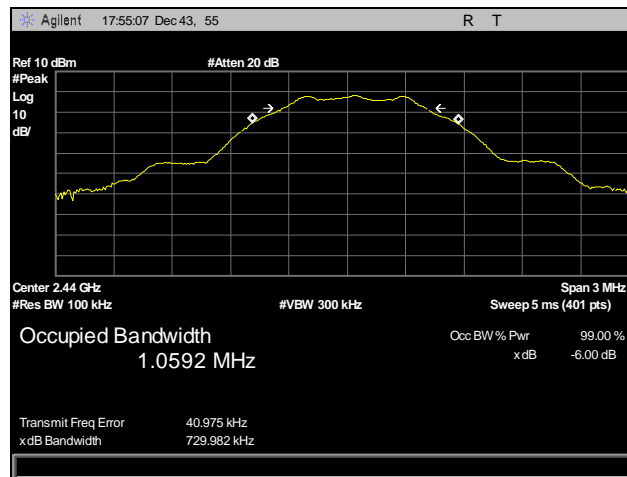
Occupied Bandwidth		
Carrier Channel	Frequency (MHz)	Measured 6 dB Bandwidth (kHz)
Low	2402	726.973
Mid	2440	729.982
High	2480	727.230

**Table 11. 6 dB Occupied Bandwidth, Test Results**

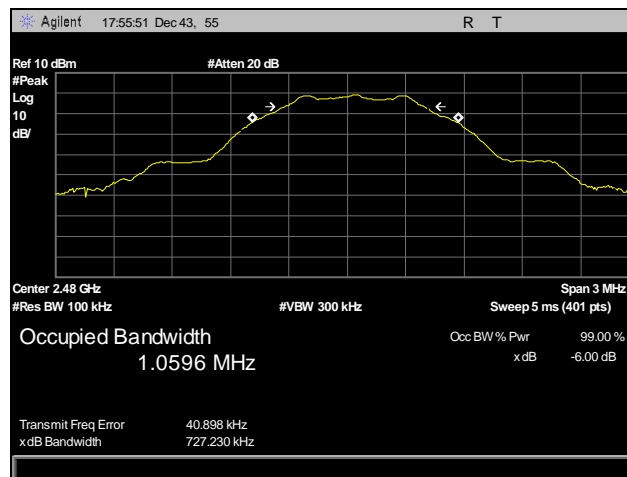
### 6 dB Occupied Bandwidth Test Results



**Plot 3. 6 dB Occupied Bandwidth, Low Channel**



**Plot 4. 6 dB Occupied Bandwidth, Mid Channel**



**Plot 5. 6 dB Occupied Bandwidth, High Channel**

**Electromagnetic Compatibility Criteria for Intentional Radiators**

**§ 15.247(b) Peak Power Output**

**Test Requirements:** §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

Digital Transmission Systems (MHz)	Output Limit (Watts)
902-928	1.000
2400-2483.5	1.000
5725- 5850	1.000

**Table 12. Output Power Requirements from §15.247(b)**

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values in the Table 12, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

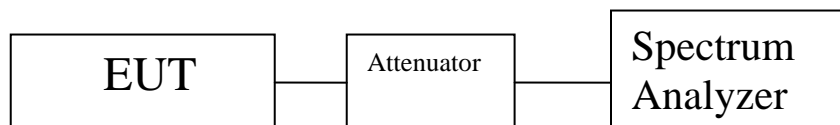
Fixed, point-to-point operation excludes the use of point-to-multipoint systems, Omni-directional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

**Test Procedure:** The transmitter was connected to a calibrated spectrum analyzer. The EUT was measured at the low, mid and high channels of each band at the maximum power level.

**Test Results:** The EUT was compliant with the Peak Power Output limits of §15.247(b).

**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/07/19



**Figure 3. Peak Power Output Test Setup**

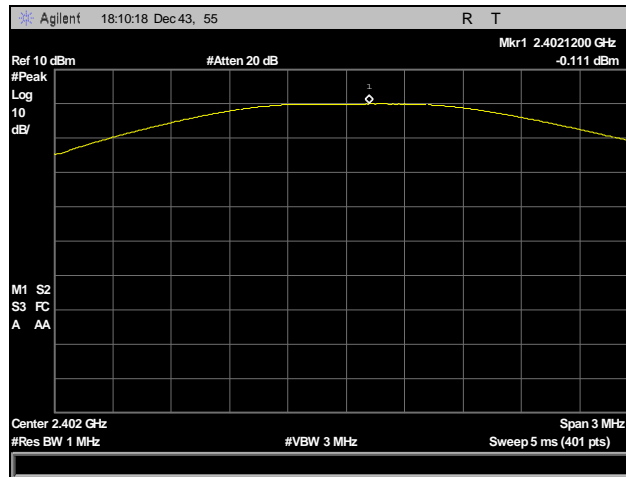


**Peak Power Output Test Results**

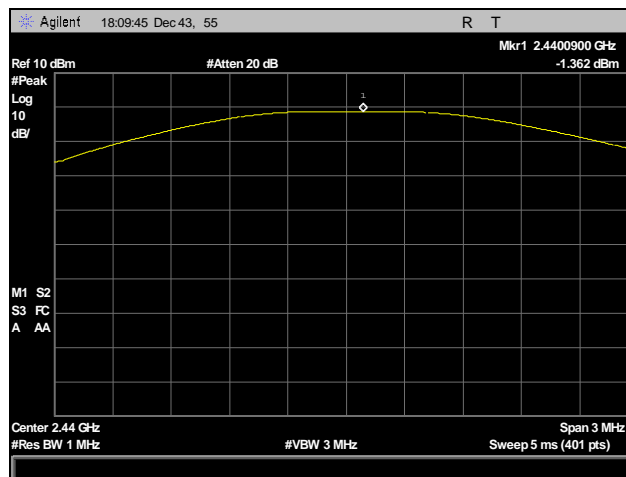
<b>Peak Conducted Output Power</b>		
<b>Carrier Channel</b>	<b>Frequency (MHz)</b>	<b>Measured Peak Output Power dBm</b>
Low	2402	-0.111
Mid	2440	-1.362
High	2480	-0.476

**Table 13. Peak Power Output, Test Results**

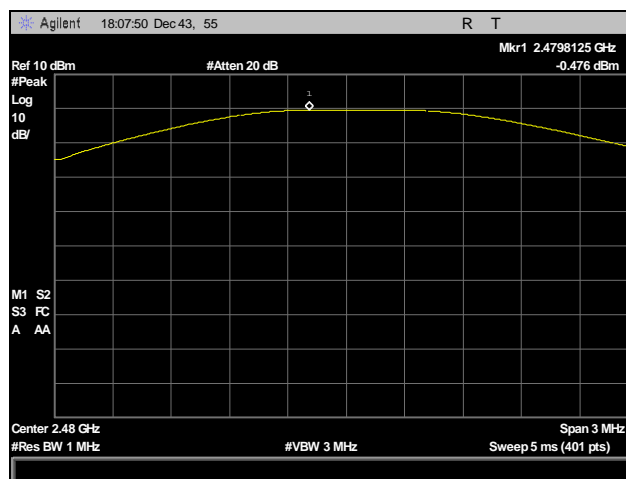
### Peak Power Output Test Results



**Plot 6. Peak Power Output, Low Channel**



**Plot 7. Peak Power Output, Mid Channel**



**Plot 8. Peak Power Output, High Channel**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

**Test Requirements:** §15.247(d); §15.205: Emissions outside the frequency band.

**§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. 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).

**§15.205(a):** Except as shown 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	399.9–410	4.5–5.15
<sup>1</sup> 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358 36.	43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	( <sup>2</sup> )

**Table 14. Restricted Bands of Operation**

<sup>1</sup> Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

<sup>2</sup> Above 38.6

**Test Requirement(s):** § 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 Table 15.

Frequency (MHz)	§ 15.209(a), Radiated Emission Limits (dBµV) @ 3m
30 - 88	40.00
88 - 216	43.50
216 - 960	46.00
Above 960	54.00

**Table 15. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)**

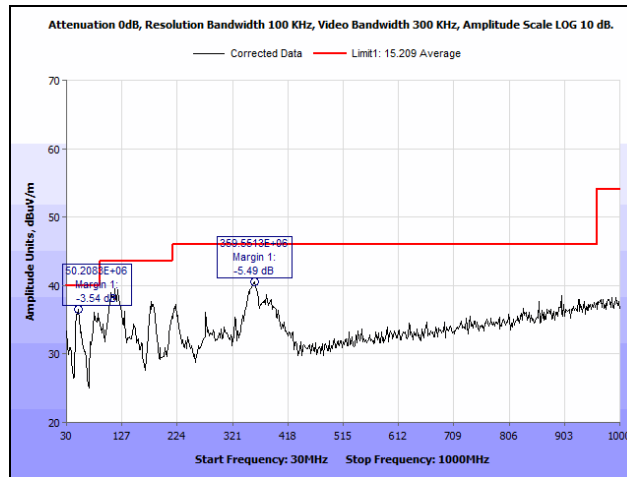
**Test Procedures:** The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line. Only noise floor was measured above 18 GHz.

**Test Results:** The EUT was compliant with the Radiated Spurious Emission limits of § 15.247(d).

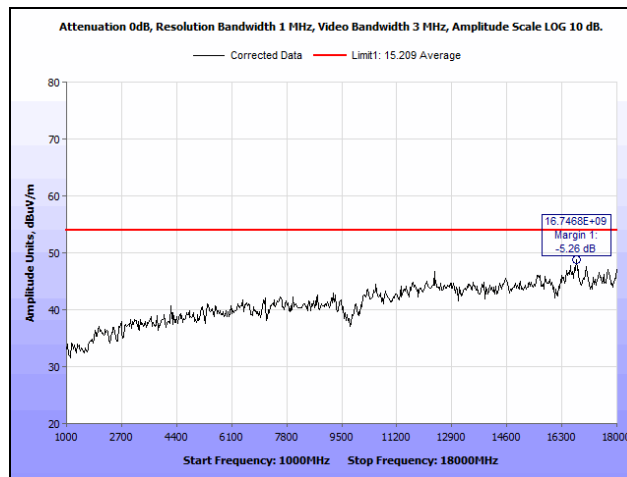
**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/07/19

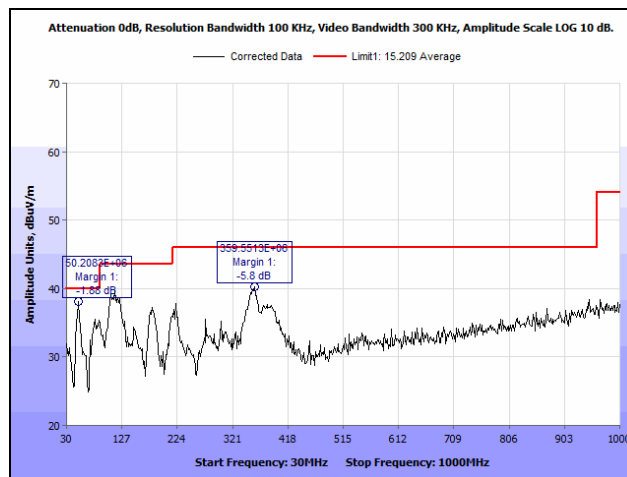
## Radiated Spurious Emissions Test Results



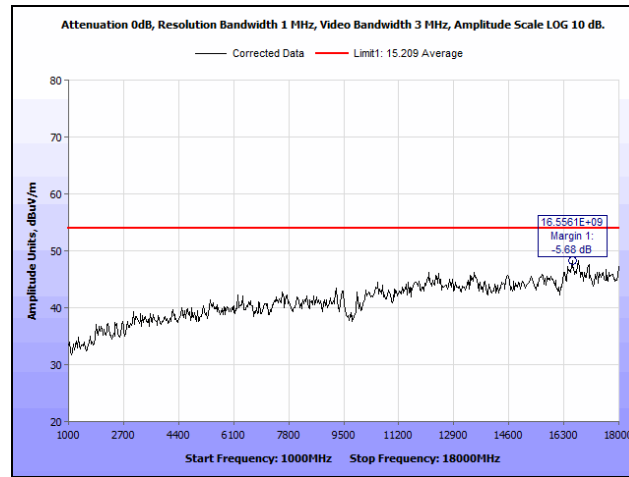
**Plot 9. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz**



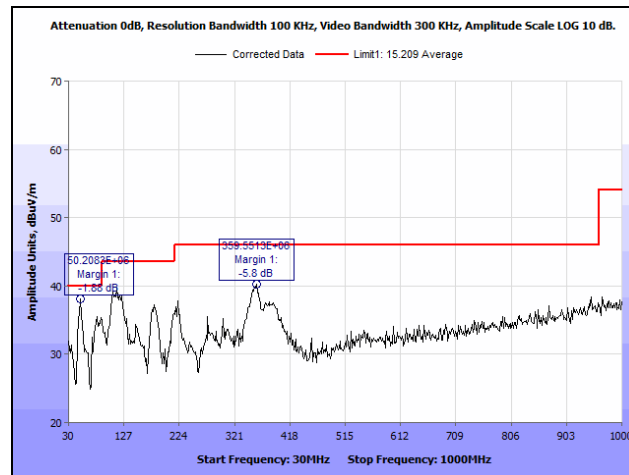
**Plot 10. Radiated Spurious Emissions, Low Channel, 1 GHz – 18 GHz**



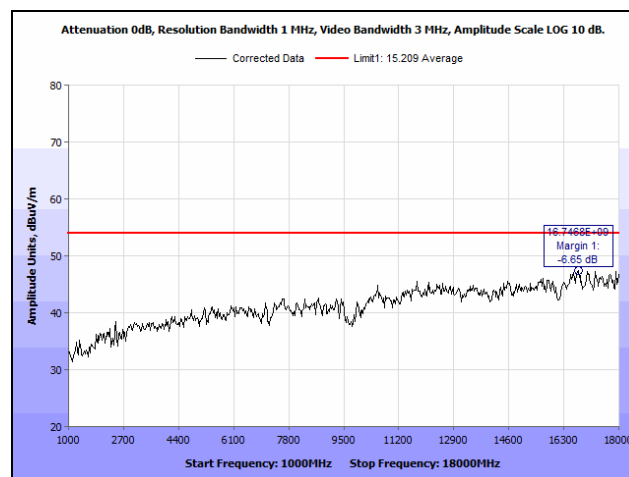
**Plot 11. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz**



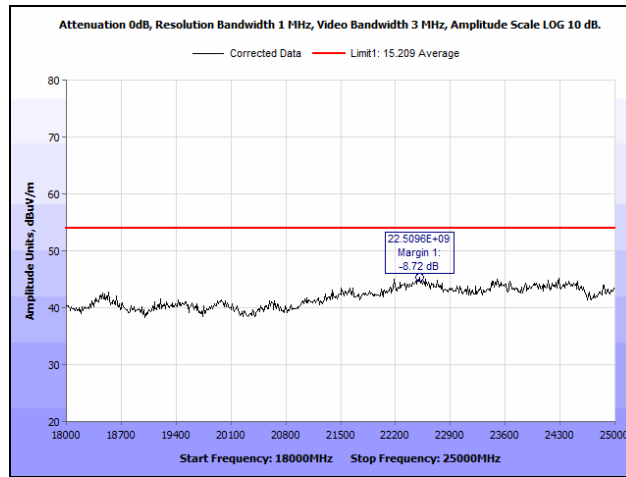
**Plot 12. Radiated Spurious Emissions, Mid Channel, 1 GHz – 18 GHz**



**Plot 13. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz**



**Plot 14. Radiated Spurious Emissions, High Channel, 1 GHz – 18 GHz**

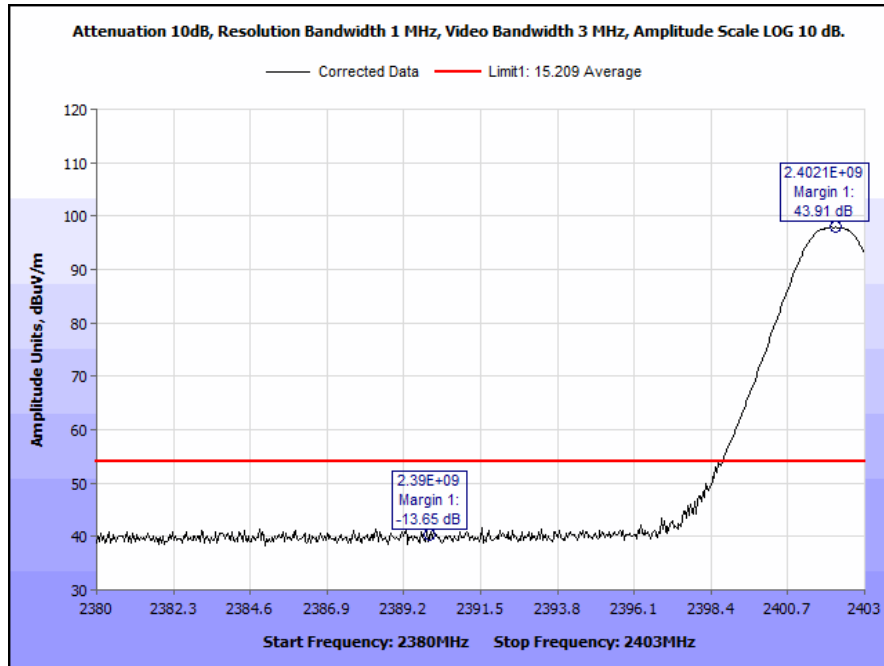


**Plot 15. Radiated Spurious Emissions, 18 GHz – 25 GHz**

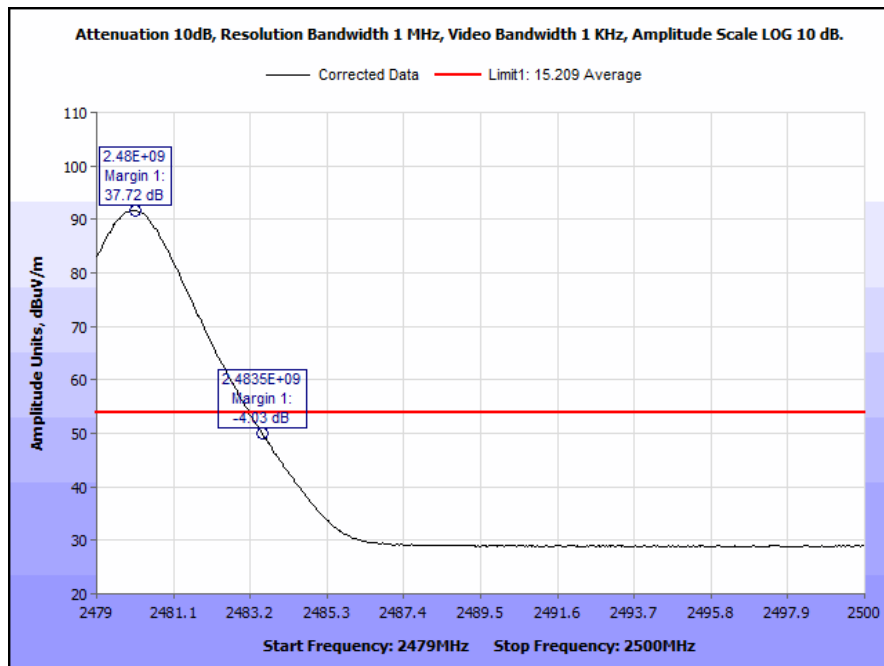
Note: The above 18 – 25GHz represents the plot for all tested frequencies, which provided no measureable emissions above ambient.

## Radiated Band Edge Measurements

**Test Procedures:** The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line.

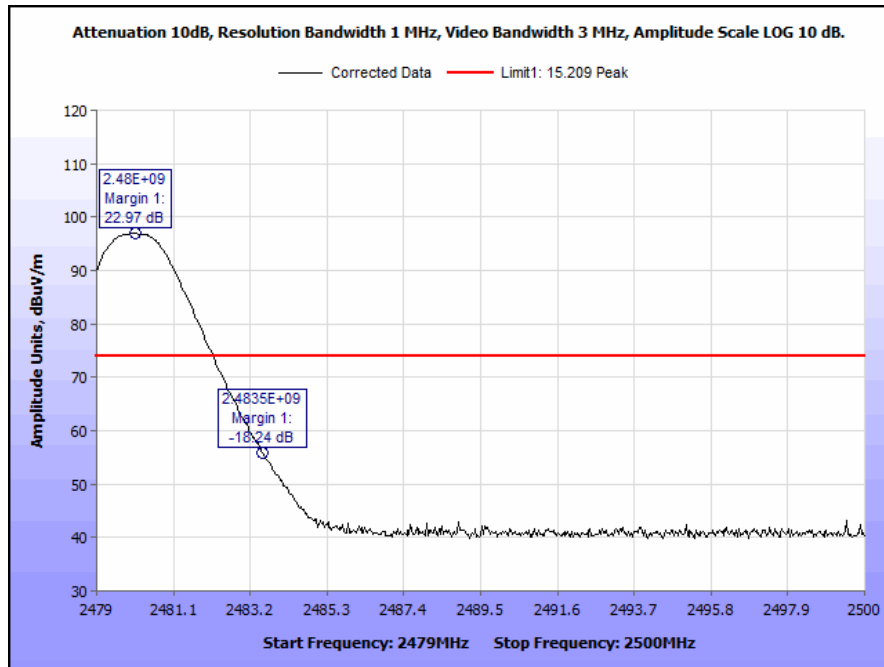


**Plot 16. Radiated Restricted Band Edge, Low Channel**



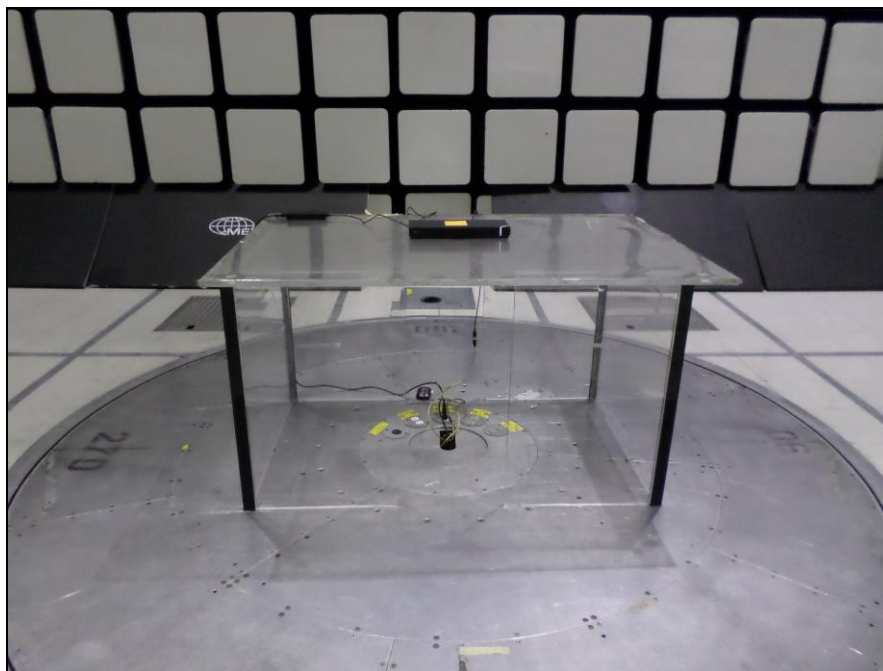
**Plot 17. Radiated Restricted Band Edge, High Channel, Average**



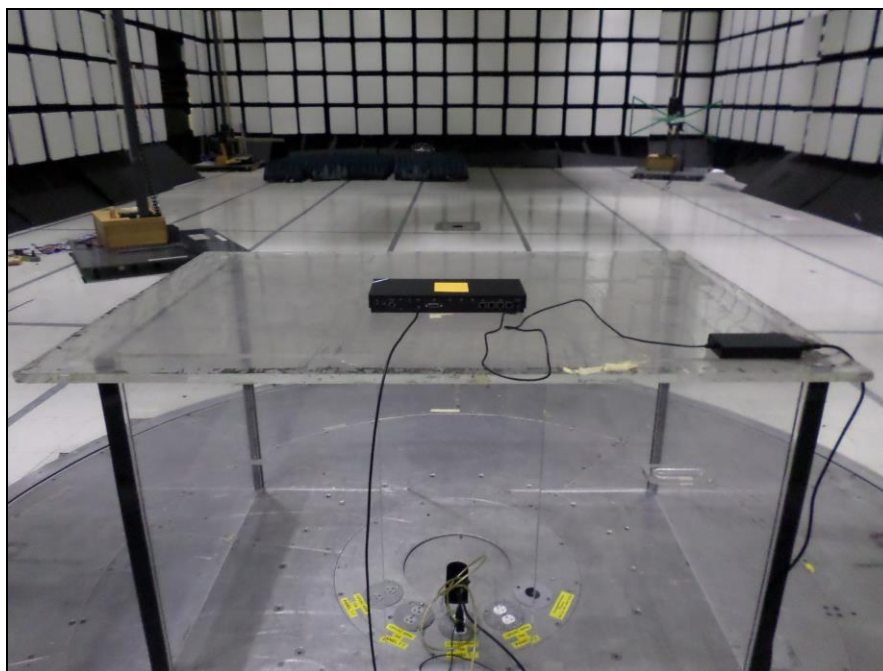


**Plot 18. Radiated Restricted Band Edge, High Channel, Peak**

### Radiated Spurious Emissions Test Setup



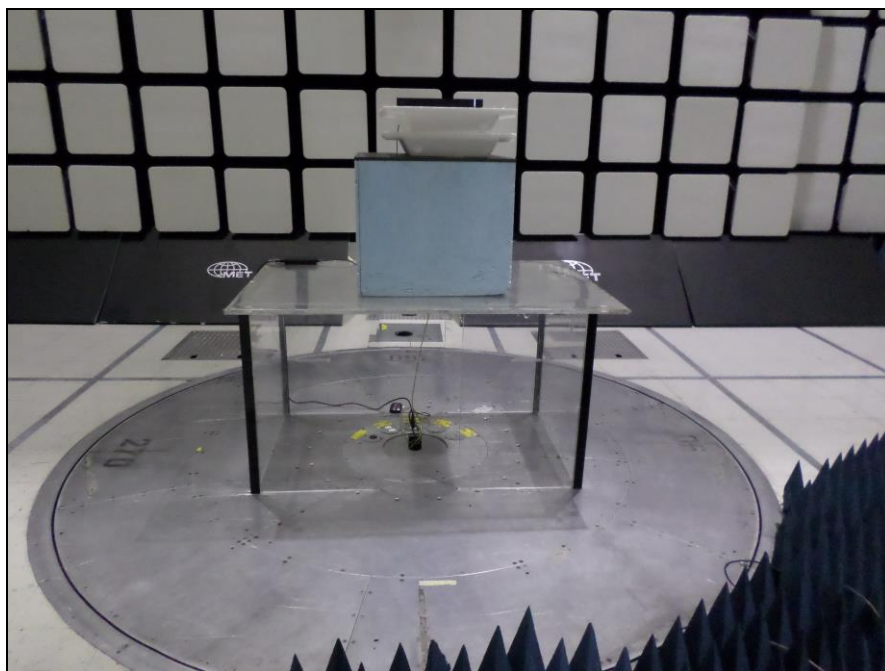
Photograph 3. Radiated Spurious Emissions, Test Setup, Below 1 GHz, Front View



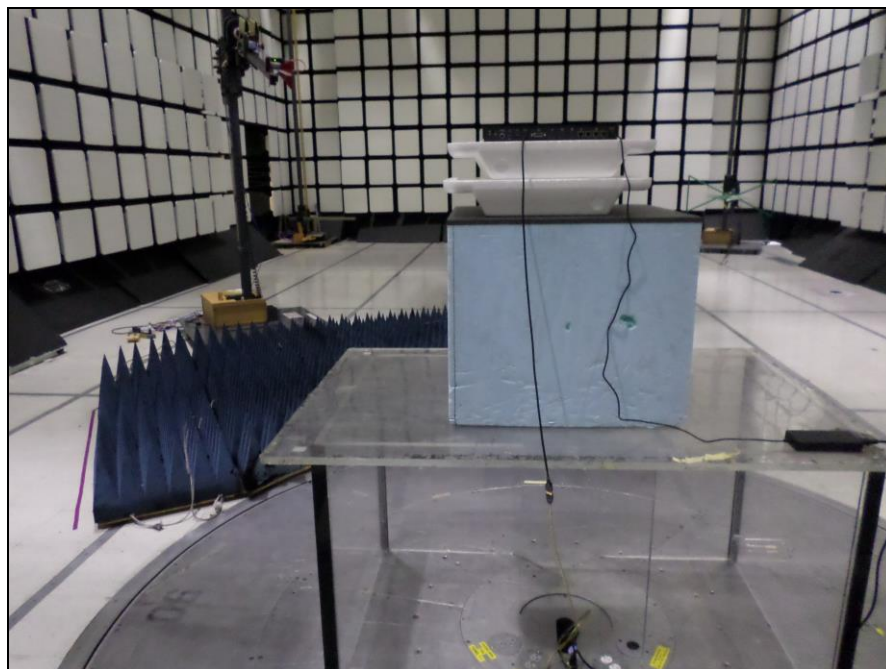
Photograph 4. Radiated Spurious Emissions, Test Setup, Below 1 GHz, Rear View



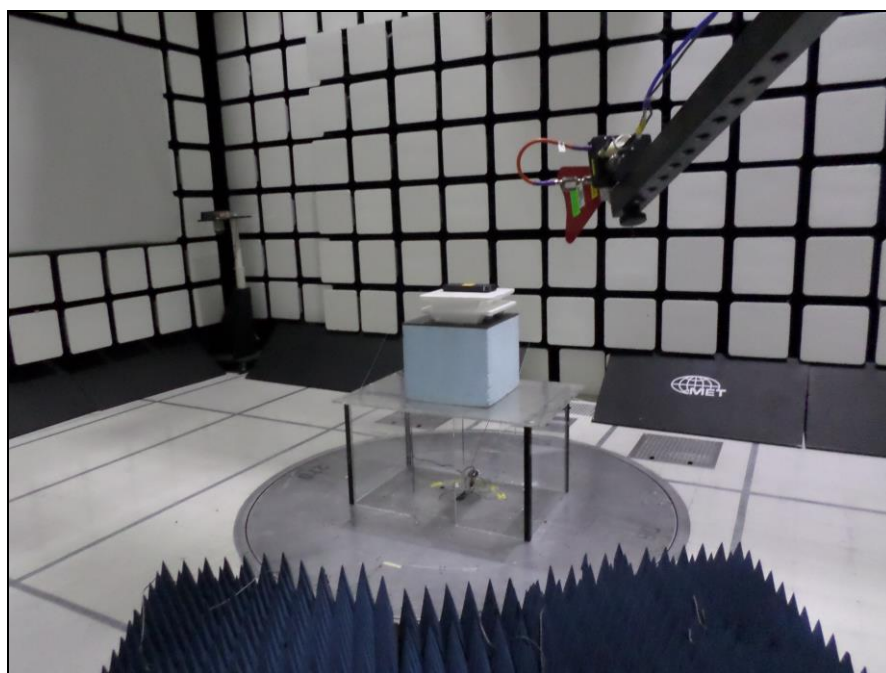
**Photograph 5. Radiated Spurious Emissions, Test Setup, Below 1 GHz, Antenna View**



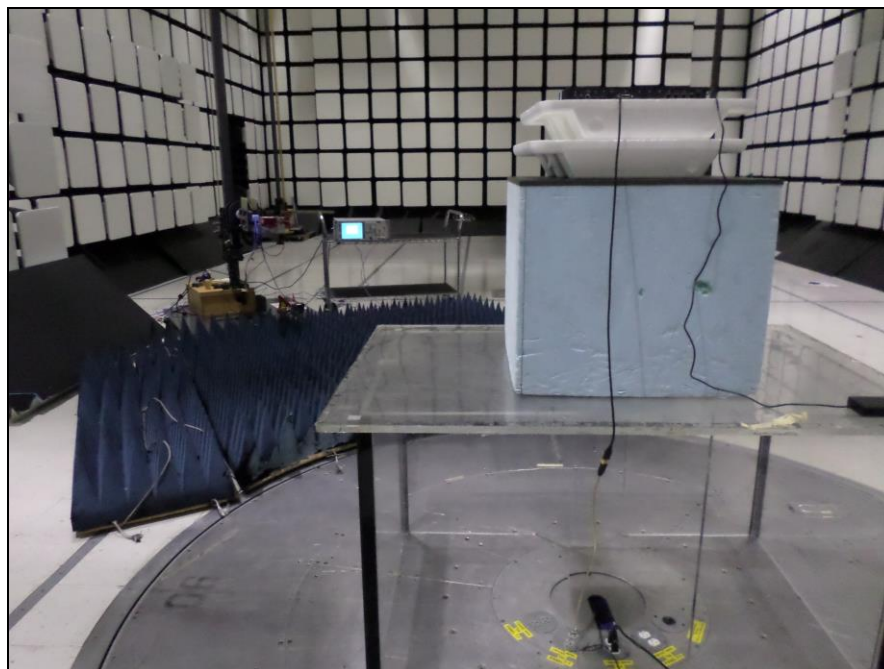
**Photograph 6. Radiated Spurious Emissions, Test Setup, Above 1 GHz, Front View**



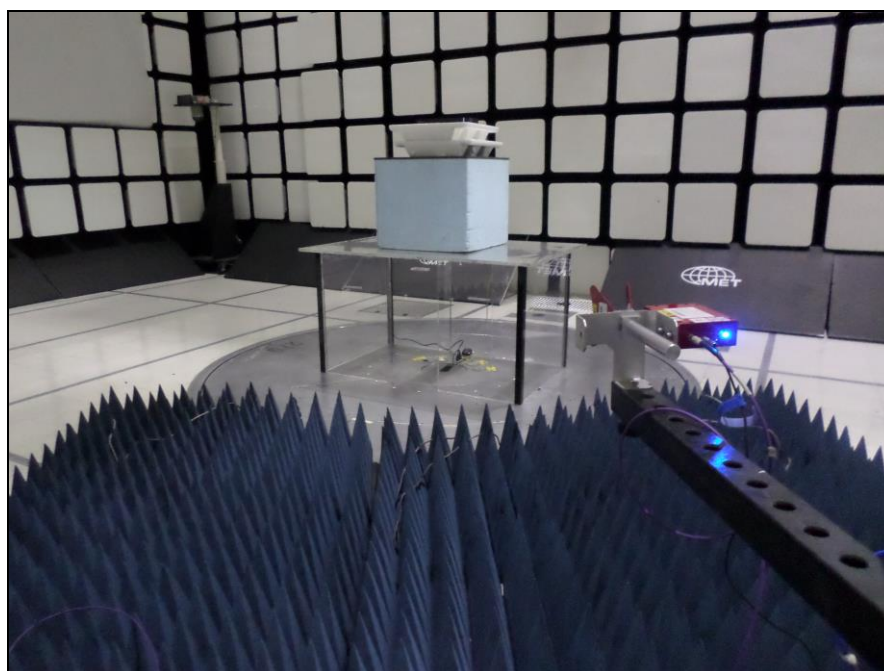
Photograph 7. Radiated Spurious Emissions, Test Setup, 1 GHz – 18 GHz, Rear View



Photograph 8. Radiated Spurious Emissions, Test Setup, 1 GHz – 18 GHz, Antenna View



**Photograph 9. Radiated Spurious Emissions, Test Setup, Above 18 GHz, Rear View**



**Photograph 10. Radiated Spurious Emissions, Test Setup, Above 18 GHz, Antenna View**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

**Test Requirement:** **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.

**Test Procedure:** For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10<sup>th</sup> harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

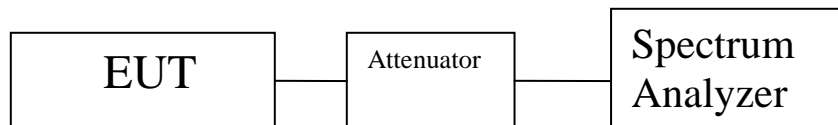
Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

See following pages for detailed test results with RF Conducted Spurious Emissions.

**Test Results:** The EUT was compliant with the Conducted Spurious Emission limits of **§15.247(d)**.

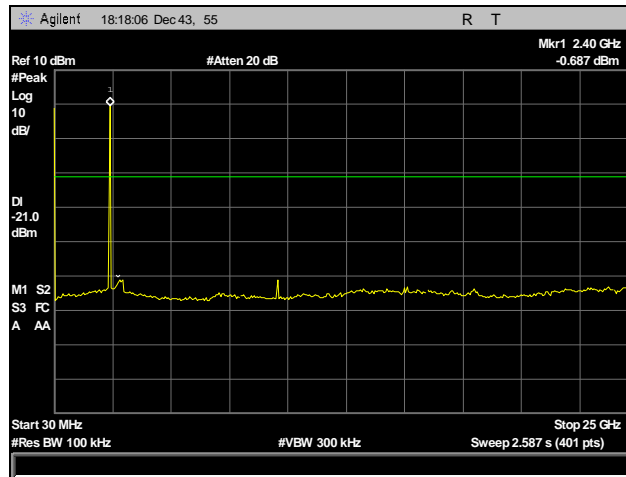
**Test Engineer(s):** Giuliano Messina

**Test Date(s):** 02/07/19

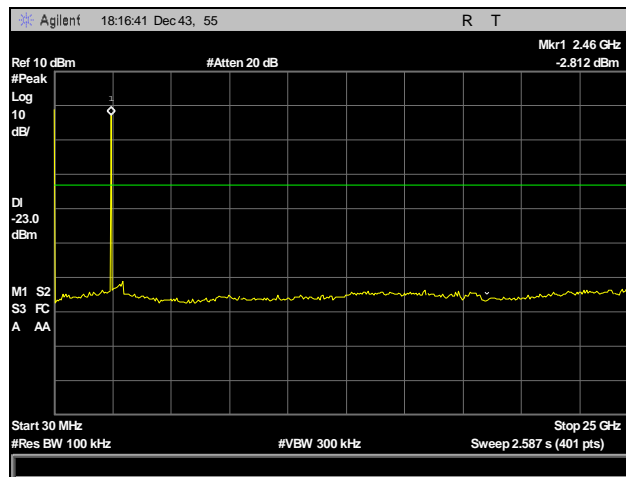


**Figure 4. Block Diagram, Conducted Spurious Emissions Test Setup**

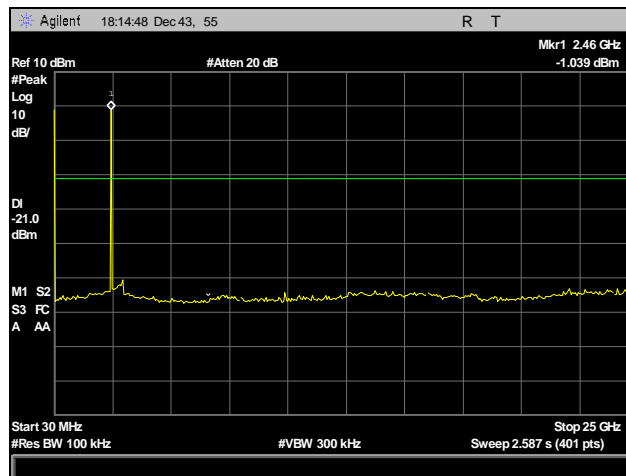
### Conducted Spurious Emissions Test Results



Plot 19. Conducted Spurious Emissions, Low Channel, 30 MHz – 25 GHz

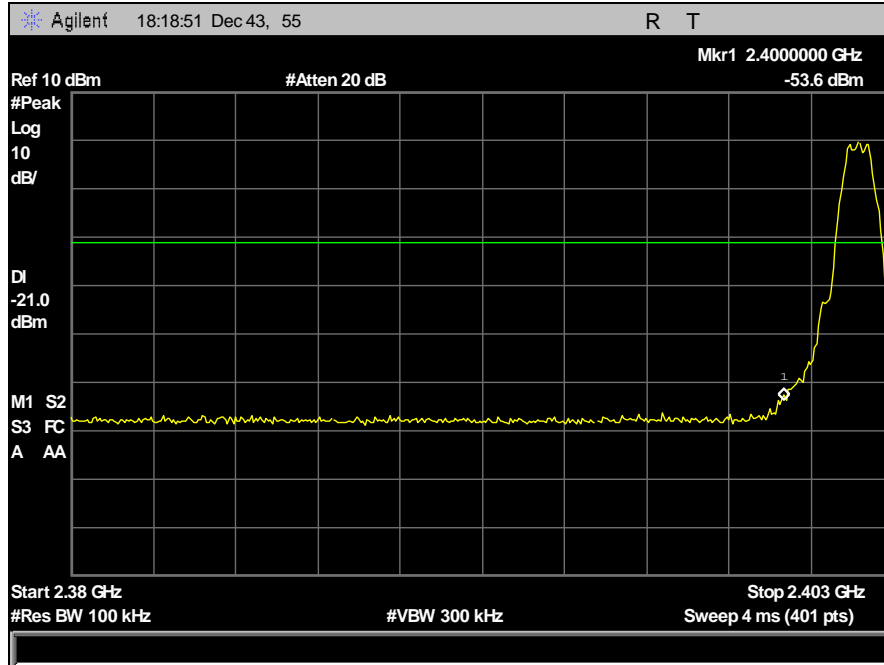


Plot 20. Conducted Spurious Emissions, Mid Channel, 30 MHz – 25 GHz

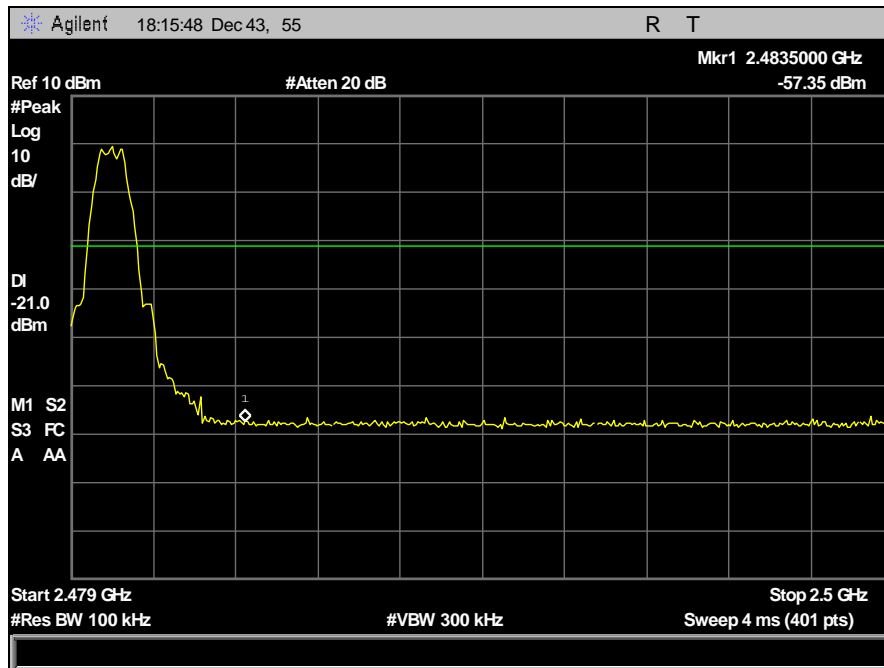


Plot 21. Conducted Spurious Emissions, High Channel, 30 MHz – 25 GHz

### Conducted Band Edge Test Results



Plot 22. Conducted Band Edge, Low Channel



Plot 23. Conducted Band Edge, High Channel



## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(e) Peak Power Spectral Density

**Test Requirements:** §15.247(e): For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8dBm in any 3 kHz band during any time interval of continuous transmission.

**Test Procedure:** The transmitter was connected directly to a Spectrum Analyzer through an attenuator. The power level was set to the maximum level. The RBW was set to 100 kHz and a VBW set to 300 kHz. The spectrum analyzer was set to an auto sweep time and a peak detector was used. Measurements were carried out at the low, mid and high channels.

**Test Results:** The EUT was compliant with the peak power spectral density limits of § 15.247 (e).  
The peak power spectral density was determined from plots on the following page(s).

**Test Engineer:** Giuliano Messina

**Test Date:** 02/07/19

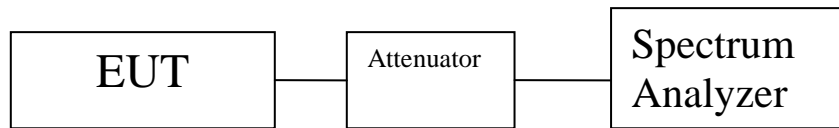
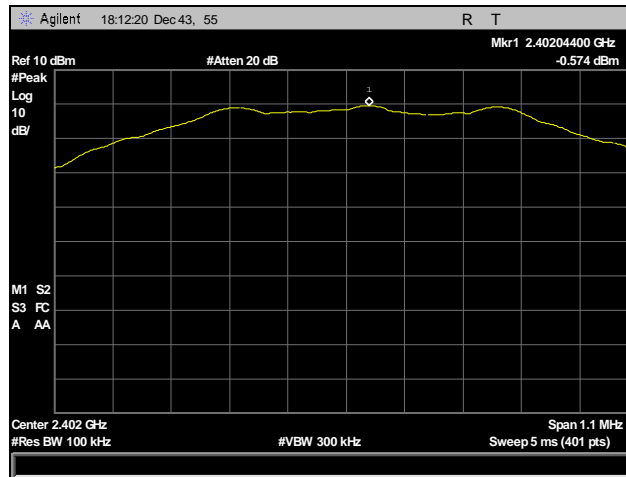


Figure 5. Block Diagram, Peak Power Spectral Density Test Setup

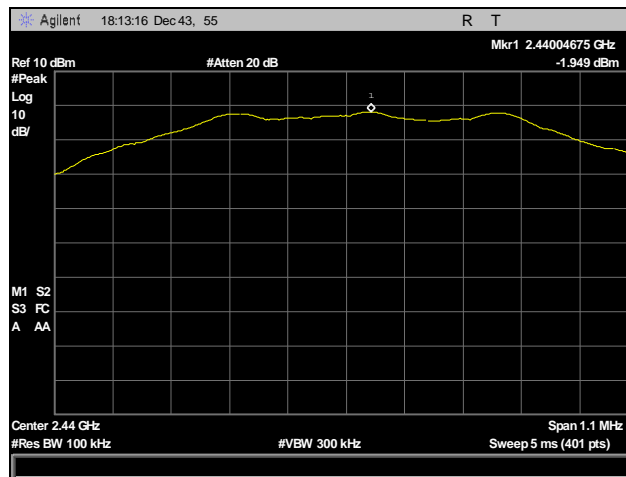
Peak Power Spectral Density				
Carrier Channel	Frequency (MHz)	Measured PPSD (dBm)	Limit (dBm)	Margin (dB)
Low	2402	-0.574	8	8.574
Mid	2440	-1.949	8	9.949
High	2480	-0.827	8	8.827

Table 16. Peak Power Spectral Density, Test Results

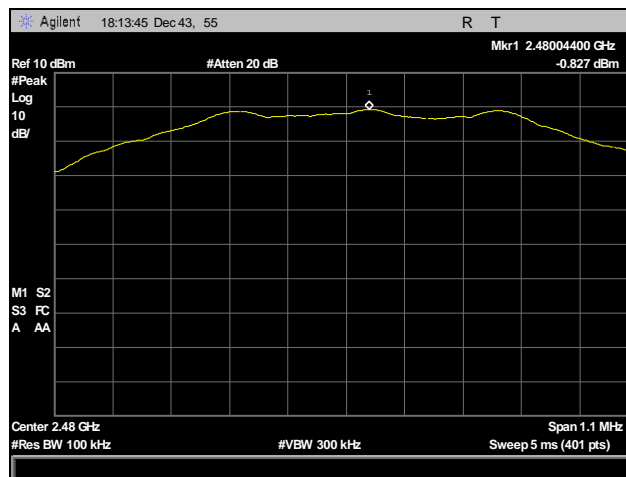
### Peak Power Spectral Density



**Plot 24. Peak Power Spectral Density, Low Channel**



**Plot 25. Peak Power Spectral Density, Mid Channel**



**Plot 26. Peak Power Spectral Density, High Channel**

## Electromagnetic Compatibility Criteria for Intentional Radiators

### § 15.247(i) Maximum Permissible Exposure

**RF Exposure Requirements:** §1.1307(b)(1) and §1.1307(b)(2): Systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission’s guidelines.

**RF Radiation Exposure Limit:** §1.1310: As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

MPE Limit: EUT’s operating frequencies @ 2400-2483.5 MHz; **Limit for Uncontrolled exposure: 1 mW/cm<sup>2</sup> or 10 W/m<sup>2</sup>**

Equation from page 18 of OET 65, Edition 97-01

$$S = PG / 4\pi R^2 \quad \text{or} \quad R = \sqrt{PG / 4\pi S}$$

where, S = Power Density (mW/cm<sup>2</sup>)  
P = Power Input to antenna (mW)  
G = Antenna Gain (numeric value)  
R = Distance (cm)

#### Test Results:

FCC									
Frequency (MHz)	Con. Pwr. (dBm)	Con. Pwr. (mW)	Ant. Gain (dBi)	Ant. Gain numeric	Pwr. Density (mW/cm <sup>2</sup> )	Limit (mW/cm <sup>2</sup> )	Margin	Distance (cm)	Result
2402	-0.111	0.975	2.6	1.82	0.00035	1	0.99965	20	Pass

The safe distance where Power Density is less than the MPE Limit listed above was found to be 20 cm.

## IV. Test Equipment

## Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2017.

MET Asset #	Nomenclature	Manufacturer	Model	Last Cal Date	Cal Due Date
1A1184	SPECTRUM ANALYZER	AGILENT	E4407B	4/20/2018	4/20/2019
1A1083	EMI TEST RECEIVER	ROHDE & SCHWARZ	ESU40	10/17/2018	10/17/2019
1A1106	10M CHAMBER (FCC)	ETS	SEMI-ANECHOIC	12/2/2016	12/2/2019
1A1050	BILOG ANTENNA (30MHZ TO 1GHZ)	SCHAFFNER	CBL 6112D	8/29/2018	2/29/2020
1A1050-A	ATTENUATOR	FAIRVIEW MICROWAVE	SA6N5WA-04	8/29/2018	2/29/2020
1A1047	HORN ANTENNA	ETS	3117	10/30/2018	4/30/2020
1A1161	DRG HORN ANTENNA	ETS	3116C-PA	10/9/2018	4/9/2020
1A1099	GENERATOR	COM-POWER CORP	CGO-51000	SEE NOTE	
1A1088	PRE-AMP	ROHDE & SCHWARZ	TS-PR1	SEE NOTE	
1A1044	GENERATOR	COM-POWER CORP	CG-520	SEE NOTE	
1A1073	MULTI DEVICE CONTROLLER	ETS EMCO	2090	SEE NOTE	
1A1074	SYSTEM CONTROLLER	PANASONIC	WV-CU101	SEE NOTE	
1A1080	MULTI DEVICE CONTROLLER	ETS EMCO	2090	SEE NOTE	
1A1180	PRE-AMP	MITEQ	AMF-7D-01001800-22-10P	SEE NOTE	

**Table 17. Test Equipment List**

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

## **V. Certification & User's Manual Information**

## Certification & User's Manual Information

### A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

#### § 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

#### § 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
  - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
  - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing*;
  - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
  - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
  - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
  - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.



## Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

### § 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.<sup>1</sup> *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer, be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.*
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

### § 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

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<sup>1</sup> In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

## Certification & User's Manual Information

### § 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
- (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
- (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
- (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
- (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

## Certification & User's Manual Information

### 1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

#### § 15.19 Labeling requirements.

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

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., 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 condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (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 under paragraph (a) of this section is required to be affixed only to the main control unit.

- (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.

#### § 15.21 Information to user.

The user's manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

## Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

### § 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

# End of Report