

FCC / ISED Test Report

For:

Telular Corporation

Model#: ST90M

Marketing Name: ST90 CAT-M

Product Description: Tank level monitoring

FCC ID: MTFST90M **IC:** 2175D-ST90M

Applied Rules and Standards:

47 CFR Part 15.247 (DTS) RSS-247 Issue 3 (DTSs) & RSS-Gen Issue 5

REPORT #: EMC_TELUL_222_24001_FCC_15_247_ISM

DATE: 2024-05-28



A2LA Accredited

IC recognized # 3462B-1

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1 **Assessment**

The following device was evaluated against the applicable criteria specified in FCC rules Parts 15.247 of Title 47 of the Code of Federal Regulations and the relevant ISED Canada standard RSS-247.

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No deviations were ascertained.

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| Company | Description | Model # | |
|---------------------|-----------------------|---------|--|
| Telular Corporation | Tank level monitoring | ST90M | |

Responsible for the Report:

Chena Sona

| 2024-05-28 | Compliance | (EMC Engineer) | |
|------------|------------|----------------|-----------|
| Date | Section | Name | Signature |

The test results of this test report relate exclusively to the test item specified in Section3.

CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

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Administrative Data 2

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2.1 Identification of the Testing Laboratory Issuing the EMC Test Report

| Company Name: | CETECOM Inc. |
|-----------------------------|------------------------|
| Department: | Compliance |
| Street Address: | 411 Dixon Landing Road |
| City/Zip Code | Milpitas, CA 95035 |
| Country | USA |
| Telephone: | +1 (408) 586 6200 |
| Fax: | +1 (408) 586 6299 |
| EMC Engineer | Cheng Song |
| Responsible Project Leader: | Sangeetha Sivaraman |

2.2 **Identification of the Client**

| Client's Name: | Telular Corporation |
|-----------------|------------------------------|
| Street Address: | 3225 Cumberland Blvd. |
| City/Zip Code | Suite 300, Atlanta, GA 30339 |
| Country | USA |

Identification of the Manufacturer 2.3

| Manufacturer's Name: | |
|------------------------|----------------|
| Manufacturers Address: | Same as Client |
| City/Zip Code | Same as offent |
| Country | |

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3 Equipment Under Test (EUT)

3.1 EUT Specifications

| Model No: | ST90M | | | | | |
|---|---|--|------------------|--------------------|--|--|
| Brand: | Tank Monitoring | | | | | |
| HW Version : | А | | | | | |
| SW Version : | 2.50 | | | | | |
| FCC-ID: | MTFST90M | | | | | |
| IC: | 2175D-ST90M | | | | | |
| HVIN: | ST90M | | | | | |
| PMN: | ST90 CAT-M | | | | | |
| Product Description: | Tank level monitoring | | | | | |
| Radio Information as declared: | ISM: Module: Texas Instruments CC1200 Chipset Frequency of Operation: 902-928 MHz Cellular: Module: Telit ME910G1-W1 LTE Bands: 2, 4, 12, 13 FCC ID: RI7ME910G1W1; IC: 5131A-ME910G1W1 (CAT-M1) | | | | | |
| | | LTE ISM US FPC Dual Feed Embedded Antenna: | | | | |
| | Feed | ISM | | ГЕ | | |
| Antenna Information as declared: | Frequency (MHz) | 902 - 928 MHz | 700 - 900 MHz | 1710 – 2155 MHz | | |
| decialed. | Average Efficiency | 50% | 52% | 59% | | |
| | Peak Gain | 0.5dBi | 0.9dBi | 3dBi | | |
| | VSWR Match | 2.0:1 max | 4.5:1 max | 3.5:1 max | | |
| Max. Peak Output Power: | 10.38 dBm | | | | | |
| Power Supply/ Rated Operating Voltage Range: | Vmin: 5 VDC/ Vnom: 6 VDC / Vmax: 6.3 VDC | | | | | |
| Operating Temperature Range | -30 °C to 70 °C | | | | | |
| Sample Revision | □Production Unit; ■ | Pre-Production | | | | |
| EUT Dimensions | 100 x 107 x 150mm | | | | | |
| Note: Details about the Equipment Under Test (EUT) are provided by the client or applicant. | | | | | | |

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3.2 EUT Sample details

| EUT# | Serial Number | HW Version | SW Version | Notes/Comments |
|------|---------------|------------|------------|----------------|
| 1 | 942106500 | А | 2.50 | - |

3.3 Accessory Equipment (AE) details

| AE# | Туре | Model | Manufacturer | Serial Number |
|-----|------|-------|--------------|---------------|
| 1 | - | - | - | - |

3.4 Test Sample Configuration

| EUT Set-up # | Combination of AE used for test set up | Comments |
|--------------|--|-----------------------|
| 1 | EUT#1 | Conducted Measurement |
| 2 | EUT#1 | Radiated Measurement |

3.5 Mode of Operation

| Mode of Operation Description of Operating modes | | Additional Information | | | |
|--|-----|---|--|--|--|
| | | ISM was tested on Low, Mid and High Channels at the maximum power. | | | |
| 1 | ISM | The client provides a USB cable to communicate with the device and send commands for configuring the ISM radio into a specific test mode. This test mode configuration, designed for worst-case scenarios, is not intended for end-user application and is outlined as follows: | | | |
| | | ISM: continuous modulated transmission at the maximum output power settings, highest duty cycle, and Low, Mid and High Channels. | | | |

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3.6 Justification for Worst Case Mode of Operation

During the testing process the ISM radio was tested with transmitter sets to low, mid and high channels at the maximum power, as it is described in section 3.5 of this document; representing the worst case mode of operation.

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For radiated measurements, all data in this report shows the worst case between horizontal and vertical antenna polarizations and for all orientations of the EUT.

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Subject of Investigation 4

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The objective of the measurements done by CETECOM Inc. was to evaluate the compliance of the EUT against the relevant requirements specified in section 1.

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The testing was conducted in accordance with RSS-247 Issue 2 (DTSs) and is still compliant with the updated RSS-247 Issue 3 (DTSs). The modifications introduced in the latest version do not affect the aspects of testing that were performed.

5 **Measurement Results Summary**

| Test Specification | Test Case | Temperature and Voltage Conditions | Mode | Pass | NA | NP | Result |
|--|---|------------------------------------|-------|------|----|----|------------------|
| §15.247(a)(1) RSS-247 5.2(a) | Emission Bandwidth | Nominal | Op. 1 | | | | Complies |
| §15.247(e) RSS-247 5.2(b) | Power Spectral Density | Nominal | Op. 1 | • | | | Complies |
| §15.247(b)(1) RSS-247 5.4(d) | Maximum Conducted Output Power and EIRP | Nominal | Op. 1 | | | | Complies |
| §15.247(d) RSS-247 5.5 | Band edge compliance Unrestricted Band Edges | Nominal | Op. 1 | - | | | Complies |
| §15.247; 15.209; 15.205 RSS-Gen 8.9; 8.10 | Band edge compliance Restricted Band Edges | Nominal | Op. 1 | | | | Complies |
| §15.247(d); §15.209 RSS-Gen 6.13 | TX Spurious emissions- Radiated | Nominal | Op. 1 | • | | | Complies |
| §15.207(a) RSS Gen 8.8 | AC Conducted Emissions | Nominal | - | | | | Note 1 Note 2 |

Note 1: NA= Not Applicable; NP= Not Performed.

Note 2: The EUT does not utilize power from the AC public mains, hence the testing is not applicable.

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6 **Measurement Uncertainty**

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Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the apparatus, with 95% confidence interval (in dB delta to result), based on a coverage factor k=2.

| Measurement System | EMC 1 | EMC 2 |
|----------------------------------|---------|---------|
| Conducted Emissions (mains port) | 1.12 dB | 0.46 dB |
| Radiated Emissions | | |
| (<30 MHz) | 3.66 dB | 3.88 dB |
| (30 MHz – 1 GHz) | 3.17 dB | 3.34 dB |
| (1 GHz – 3 GHz) | 5.01 dB | 4.45 dB |
| (> 3 GHz) | 4.0 dB | 4.79 dB |

6.1 **Environmental Conditions During Testing:**

The following environmental conditions were maintained during the course of testing:

Ambient Temperature: 20-25° C

Relative humidity: 40-60%

6.2 **Dates of Testing:**

03/24/2022 - 04/02/2022

6.3 **Decision Rule:**

Cetecom advanced follows ILAC G8:2019 chapter 4.2.1 (Simple Acceptance Rule).

Only the measured values related to their corresponding limits will be used to decide whether the equipment under test meets the requirements of the test standards listed in chapter 3. The measurement uncertainty is mentioned in this test report. See chapter 9, but is not taken into account – neither to the limits nor to the measurement results. Measurement results with a smaller margin to the corresponding limits than the measurement uncertainty have a potential risk of more than 5% that the decision might be wrong.

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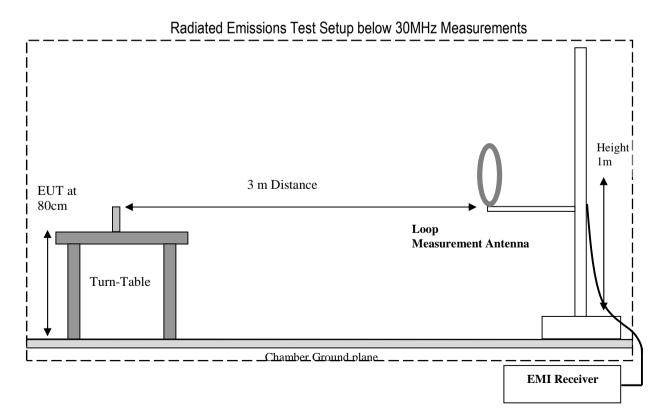
7 Measurement Procedures

7.1 Radiated Measurement

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The radiated measurement is performed according to ANSI C63.10 (2013)

- The exploratory measurement is accomplished by running a matrix of 16 sweeps over the required frequency range with R&S Test-SW EMC32 for 4 positions of the turntable, two orthogonal positions of the EUT and both antenna polarizations. This procedure exceeds the requirement of the above standards to cover the 3 orthogonal axis of the EUT. A max peak detector is utilized during the exploratory measurement. The Test-SW creates an overall maximum trace for all 12 sweeps and saves the settings for each point of this trace. The maximum trace is part of the test report.
- The 10 highest emissions are selected with an automatic algorithm of EMC32 searching for peaks in the noise floor and ensuring that broadband signals are not selected multiple times.
- The maxima are then put through the final measurement and again maximized in a 90deg range of the turntable, fine search in frequency domain and height scan between 1m and 4m.
- The above procedure is repeated for all possible ways of power supply to EUT and for all supported modulations.
- In case there are no emissions above noise floor level only the maximum trace is reported as described above.
- The results are split up into up to 4 frequency ranges due to antenna bandwidth restrictions. A magnetic loop
 is used from 9 kHz to 30 MHz, a Biconilog antenna is used from 30 MHz to 1 GHz, and two different horn
 antennas are used to cover frequencies up to 40 GHz.



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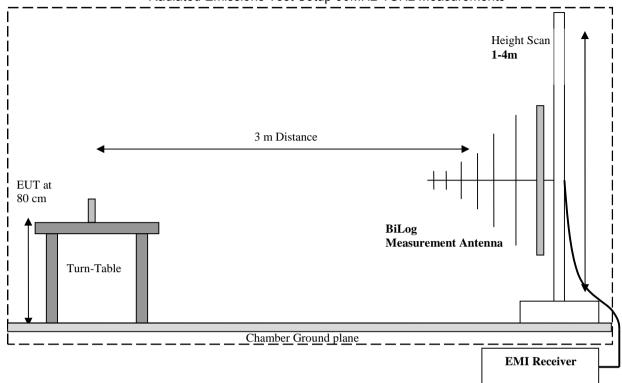
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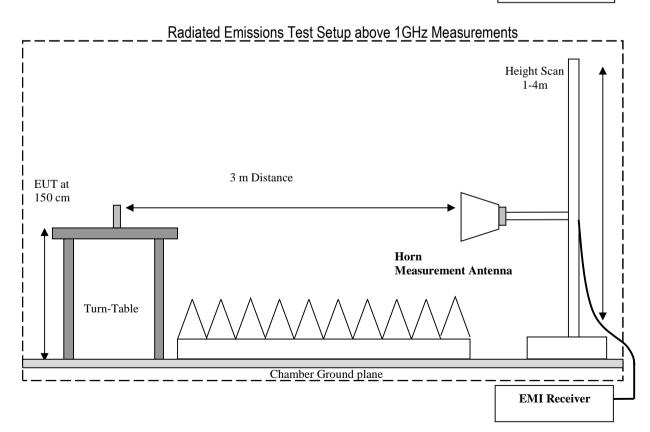
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Radiated Emissions Test Setup 30MHz-1GHz Measurements





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7.1.1 Sample Calculations for Field Strength Measurements

Field Strength is calculated from the Spectrum Analyzer/ Receiver readings, taking into account the following parameters:

- Measured reading in dBµV
- 2. Cable Loss between the receiving antenna and SA in dB and
- 3. Antenna Factor in dB/m

All radiated measurement plots in this report are taken from a test SW that calculates the Field Strength based on the following equation:

FS $(dB\mu V/m)$ = Measured Value on SA $(dB\mu V)$ + Cable Loss (dB) + Antenna Factor (dB/m)

Example:

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| Frequency (MHz) | Measured SA (dBμV) | Cable Loss (dB) | Antenna Factor Correction (dB) | Field Strength Result (dBµV/m) |
|--------------------|-----------------------|--------------------|--------------------------------------|-----------------------------------|
| 1000 | 80.5 | 3.5 | 14 | 98.0 |

7.2 Power Line Conducted Measurement Procedure

AC Power Line conducted emissions measurements performed according to: ANSI C63.4 (2014)

7.3 RF Conducted Measurement Procedure

Testing procedures are based on 558074 D01 15.247 Meas Guidance v05r02 – "GUIDANCE FOR COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEM, FREQUENCY HOPPING SPREAD SPECTRUM SYSTEM, AND HYBRID SYSTEM DEVICES OPERATING UNDER SECTION 15.247 OF THE FCC RULES" - April 2, 2019, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.



- Connect the equipment as shown in the above diagram.
- Adjust the settings of the SA (Rohde-Schwarz Spectrum Analyzer) to connect the EUT at the required mode
 of test
- Measurements are to be performed with the EUT set to the low, middle and high channels and for worst case modulation schemes.

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8 Test Result Data

8.1 Maximum Peak Conducted Output Power

8.1.1 Measurement according to ANSI C63.10 Clause 11

Spectrum Analyzer settings:

- RBW ≥ DTS bandwidth
- VBW ≥ 3 x RBW
- Span $\geq 3 \times RBW$
- Sweep = Auto couple
- Detector function = Peak
- Trace = Max hold
- Use peak marker function to determine the peak amplitude level

8.1.2 Limits:

Maximum Peak Output Power:

• FCC §15.247 (b)(1): 1 W

• IC RSS-247: 1 W

8.1.3 Test conditions and setup:

| Ambient Temperature | EUT Set-Up # | EUT operating mode | Power Input | Antenna Gain |
|---------------------|--------------|--------------------|-------------|--------------|
| 22° C | 1 | Op. 1 | Battery | 0.5 dBi |

8.1.4 Measurement result:

| Plot # | Frequency (MHz) | Maximum Peak Conducted Output Power (dBm) | EIRP (dBm) | Limit (dBm) | Result |
|-----------|--------------------|---|---------------|---------------------|--------|
| 1 | 905 | 10.38 | 10.88 | 30 (Pk) / 36 (EIRP) | Pass |
| 2 | 915 | 10.02 | 10.52 | 30 (Pk) / 36 (EIRP) | Pass |
| 3 | 925 | 9.66 | 10.16 | 30 (Pk) / 36 (EIRP) | Pass |

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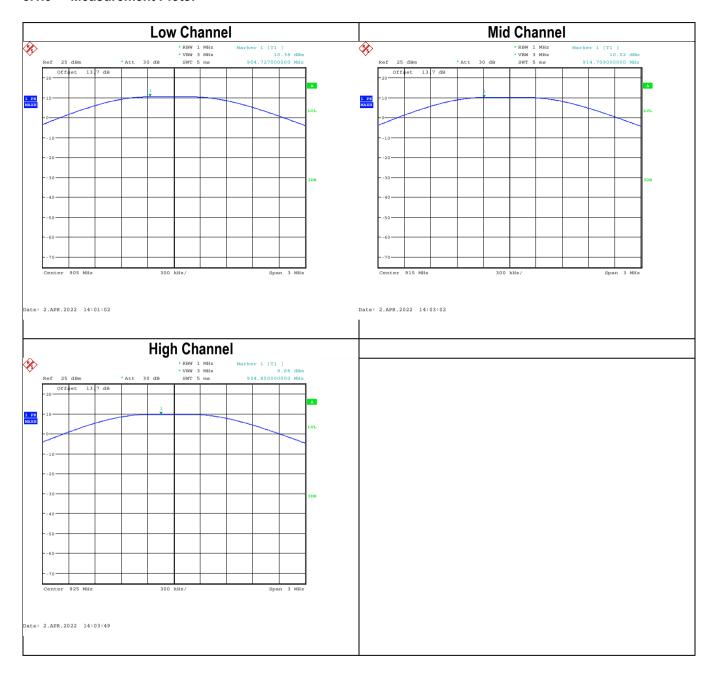
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8.1.5 Measurement Plots:

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8.2 Power Spectral Density

8.2.1 Measurement according to ANSI C63.10 Clause 11

Spectrum Analyzer settings for Peak PSD method:

- Set analyzer center frequency to DTS channel center frequency
- Set the span to 1.5 x DTS bandwidth
- Set RBW to: 3 kHz ≤ RBW ≤ 100 kHz
- Set the VBW ≥ 3 x RBW
- Detector = Peak
- Sweep time = Auto couple
- Trace mode = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level within the RBW
- If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat

8.2.2 Limits:

FCC§15.247(e) & RSS-247 5.2(b)

• For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

8.2.3 Test conditions and setup:

| Ambient Temperature | EUT Set-Up # | EUT operating mode | Power Input | Antenna Gain |
|---------------------|--------------|--------------------|-------------|--------------|
| 22° C | 1 | Op. 1 | Battery | 0.5 dBi |

8.2.4 Measurement result:

| Plot# | Frequency (MHz) | Maximum Power Spectral Density (dBm/3 kHz) | Limit (dBm / 3 kHz) | Result |
|-------|-----------------|--|--------------------------|--------|
| 1 | 905 | 4.76 | 8 | Pass |
| 2 | 915 | 4.40 | 8 | Pass |
| 3 | 925 | 3.96 | 8 | Pass |

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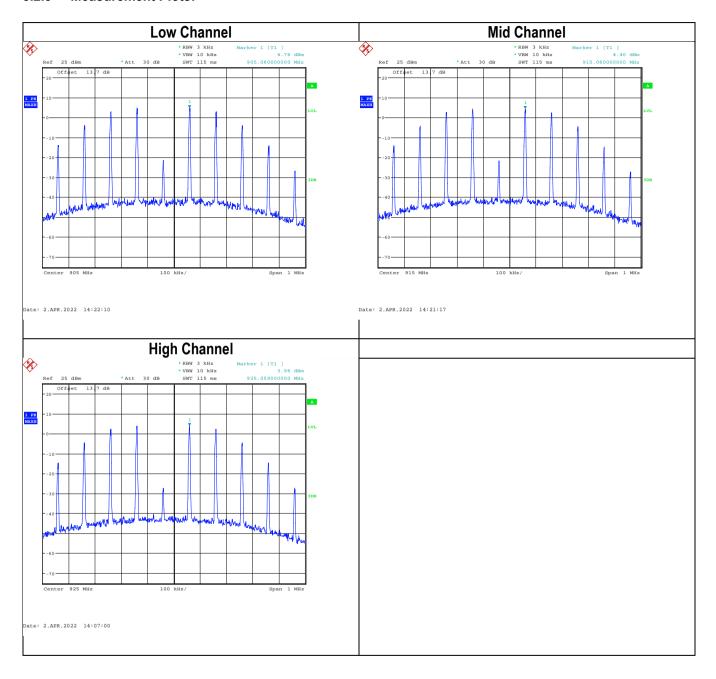
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8.2.5 Measurement Plots:

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Duty cycle 8.3

8.3.1 Measurement according to ANSI C63.10 Clause 11

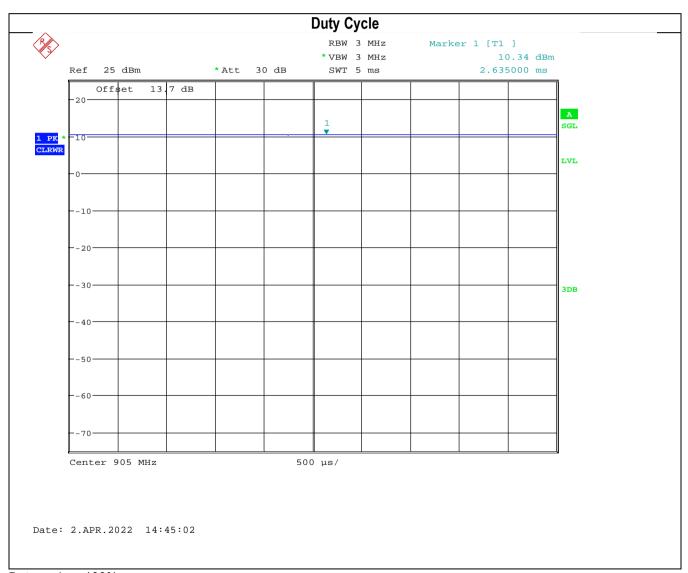
Spectrum Analyzer settings:

Set the center frequency and of the instrument to the center frequency of the transmission

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- Zero span
- Set RBW >= OBW if possible; otherwise, set RBW to the largest available value
- Detector = Peak or average

8.3.2 Measurement result



Duty cycle = 100%

Duty cycle correction factor = 10*log(1/1) = 0 dB

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8.4 Band Edge Compliance

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8.4.1 Measurement according to ANSI C63.10 Clause 11

Spectrum Analyzer settings for band edge:

- Set the center frequency and span to encompass frequency range to be measured
- RBW = 100 kHz
- VBW ≥ 3 x RBW
- Sweep Time: Auto couple
- Detector = Peak
- Trace = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level
- Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge

8.4.2 Limits non restricted band:

FCC§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. 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) (see §15.205(c)).

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• 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 30dB instead of 20dB.

Spectrum Analyzer settings for restricted band:

Peak measurements are made using a peak detector and RBW=1 MHz

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8.4.3 Limits restricted band §15.247/15.209/15.205 and RSS-Gen 8.9/8.10

- *PEAK LIMIT= 74 dBµV/m @3m =-21.23 dBm
- *AVG. LIMIT= 54 dBµV/m @3m =-41.23 dBm
- Start frequency & stop frequency according to frequency range specified in the restricted band table in FCC section 15.205 & RSS-Gen 8.10
- Measurements with a peak detector were used to show compliance to average limits, thus showing compliance to both peak and average limits.
- (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 |
| 10.495-0.505 | 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 | 2690-2900 | 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 | Above 38.6 |
| 13.36-13.41 | | | |

Test conditions and setup: 8.4.4

| Ambient Temperature | EUT Set-Up # | EUT operating mode | Power Input | Antenna Gain |
|---------------------|--------------|--------------------|-------------|--------------|
| 22° C | 1 & 2 | Op. 1 | Battery | 0.5 dBi |

8.4.5 Measurement result:

| Plot # | EUT operating mode | EUT Set-Up # | Band Edge | Band Edge Delta (dBc) | Limit (dBc) | Result |
|-----------|--------------------|--------------|----------------------|--------------------------|----------------|--------|
| 1 | Op. 1 | 1 | Lower Non-restricted | 49.98 | 20 | Pass |

| Plot # | EUT operating mode | EUT Set-Up # | Band Edge | Limit | Result |
|-----------|--------------------|--------------|------------------|-------------------|--------|
| 2 | Op. 1 | 2 | Upper Restricted | See section 8.4.3 | Pass |

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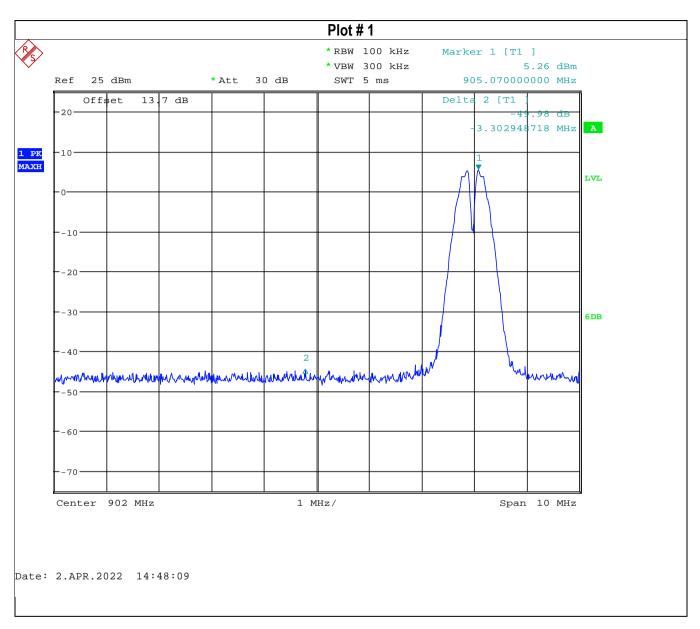
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8.4.6 Measurement Plots:

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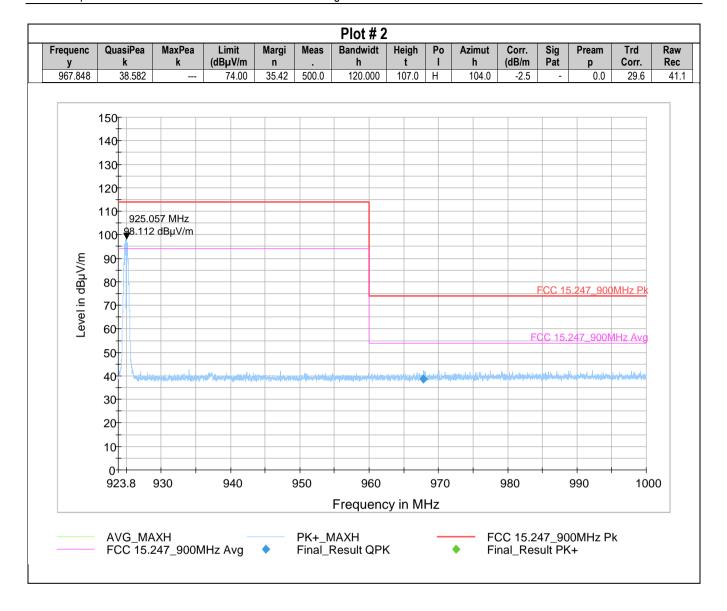
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8.5 Emission Bandwidth 6dB and 99% Occupied Bandwidth

8.5.1 Measurement according to ANSI C63.10 Clause 11

Spectrum Analyzer settings:

6dB (DTS) Bandwidth:

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- Set RBW = 100 kHz
- Set the video bandwidth (VBW) ≥ 3 x RBW
- Detector = Peak
- Trace mode = Max hold
- Sweep = Auto couple
- Allow the trace to stabilize
- Measure the maximum width of the emission that is constrained by the frequencies associated with the two
 outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the
 maximum level measured in the fundamental emission.

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99% Occupied Bandwidth:

- Set frequency = nominal EUT channel center frequency
- Set Span = 1.5 x to 5.0 x OBW
- Set RBW = 1% to 5% of OBW
- Set the video bandwidth (VBW) ≈ 3 x RBW
- Detector = Peak
- Trace mode = Max hold
- Sweep = Auto couple
- Allow the trace to stabilize
- Use the 99% power bandwidth function of the instrument (if available) and report the measured bandwidth
- If the instrument does not have a 99% power bandwidth function, then the trace data points are recovered and directly summed in linear power terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached; that frequency is recorded as the lower frequency. The process is repeated until 99.5% of the total is reached; that frequency is recorded as the upper frequency. The 99% power bandwidth is the difference between these two frequencies.

8.5.2 Limits:

FCC §15.247(a)(2) and RSS-247 5.2(a)

 Systems using digital modulation techniques may operate in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz. Test Report #: EMC_TELUL_222_24001_FCC_15_247_ISM

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8.5.3 Test conditions and setup:

| ſ | Ambient Temperature | EUT Set-Up# | EUT operating mode | Power Input |
|---|---------------------|-------------|--------------------|-------------|
| | 22° C | 1 | Op. 1 | Battery |

8.5.4 Measurement result:

| Plot # | Frequency (MHz) | 6dB Emissions Bandwidth (MHz) | Limit (MHz) | Result |
|--------|-----------------|-------------------------------|-------------|--------|
| 1 | 905 | 0.593 | > 0.5 | Pass |
| 2 | 915 | 0.593 | > 0.5 | Pass |
| 3 | 925 | 0.593 | > 0.5 | Pass |

| Plot # | Frequency (MHz) | 99% Occupied Bandwidth (MHz) |
|--------|-----------------|------------------------------|
| 4 | 905 | 0.642 |
| 5 | 915 | 0.642 |
| 6 | 925 | 0.642 |

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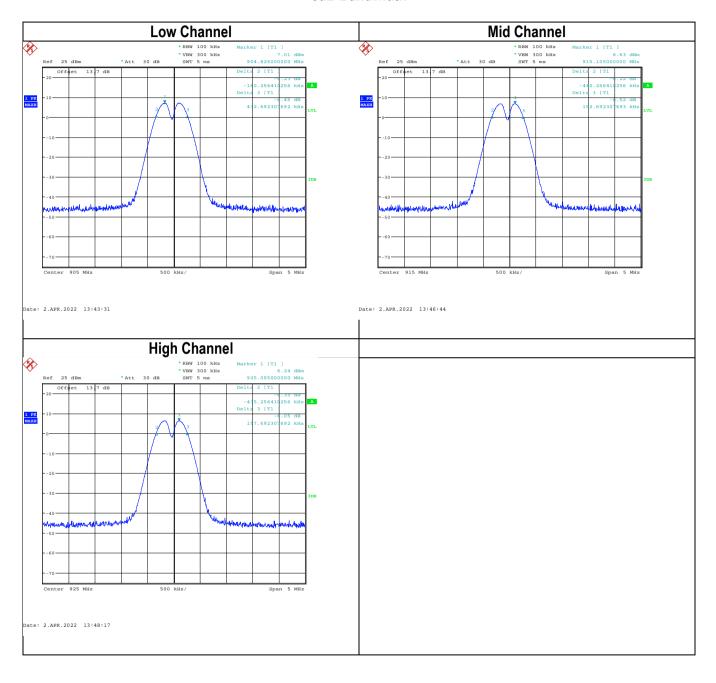
IC: 2175D-ST90M



8.5.5 **Measurement Plots:**

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6dB Bandwidth

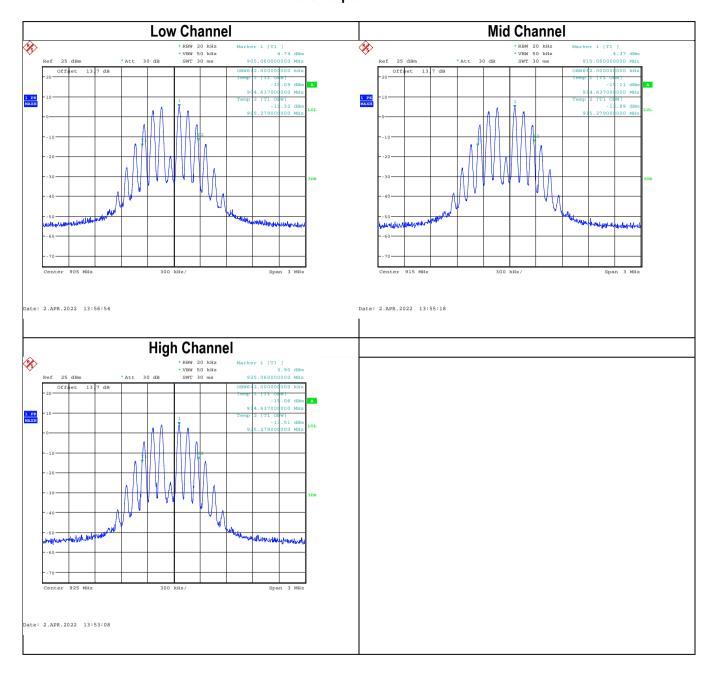


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99% Occupied Bandwidth



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8.6 Radiated Transmitter Spurious Emissions and Restricted Bands

8.6.1 Measurement according to ANSI C63.10 (2020)

Spectrum Analyzer Settings:

- Frequency = 9 KHz 30 MHz
- RBW = 9 KHz
- Detector: Peak
- Frequency = 30 MHz 1 GHz
- Detector = Peak / Quasi-Peak
- RBW= 120 KHz (<1GHz)
- Frequency > 1 GHz
- Detector = Peak / Average
- RBW = 1 MHz
- Radiated spurious emissions shall be measured for the transmit frequencies, transmit power, and data rate
 for the lowest, middle and highest channel in each frequency band of operation and for the highest gain
 antenna for each antenna type, and using the appropriate parameters and test requirements.
- The highest (or worst-case) data rate shall be recorded for each measurement.
- For testing frequencies below 30 MHz at distance other than the specified in the standard, the limit conversion is calculated by using the FCC materials for the ANSI 63 committee issued on January, 27 1991.

8.6.2 Limits:

FCC §15.247

• 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. 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) (see §15.205(c)).

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FCC §15.209 & RSS-Gen 8.9

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• Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

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| Frequency of emission (MHz) | Field strength (μV/m) | Measurement Distance (m) | Field strength @ 3m (dBµV/m) |
|-----------------------------|-----------------------|--------------------------|------------------------------|
| 0.009-0.490 | 2400/F(kHz) / | 300 | - |
| 0.490–1.705 | 24000/F(kHz) / | 30 | - |
| 1.705–30.0 | 30 / (29.5) | 30 | - |
| 30–88 | 100 | 3 | 40 dBμV/m |
| 88–216 | 150 | 3 | 43.5 dBµV/m |
| 216–960 | 200 | 3 | 46 dBμV/m |
| Above 960 | 500 | 3 | 54 dBμV/m |

FCC §15.205 & RSS-Gen 8.10

• 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 |
| 10.495-0.505 | 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 | 2690-2900 | 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 | Above 38.6 |
| 13.36-13.41 | | | |

• 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) (see §15.205(c)).

*PEAK LIMIT= 74 dBµV/m

*AVG. LIMIT= 54 dBµV/m

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8.6.3 Test conditions and setup:

| Ambient Temperature | EUT Set-Up # | EUT operating mode | Power Input |
|---------------------|--------------|--------------------|-------------|
| 22° C | 2 | Op. 1 | Battery |

8.6.4 Measurement result:

| Plot # | Channel # | Scan Frequency | Limit | Worst Case Spurious Emissions (dBµV/m) | Result |
|--------|-----------|-----------------|-------------------|---|--------|
| 1-3 | Low | 30 MHz – 18 GHz | See section 8.6.2 | 53.36 | Pass |
| 4-7 | Mid | 9 kHz – 18 GHz | See section 8.6.2 | 53.29 | Pass |
| 8-10 | High | 30 MHz – 18 GHz | See section 8.6.2 | 54.99 | Pass |

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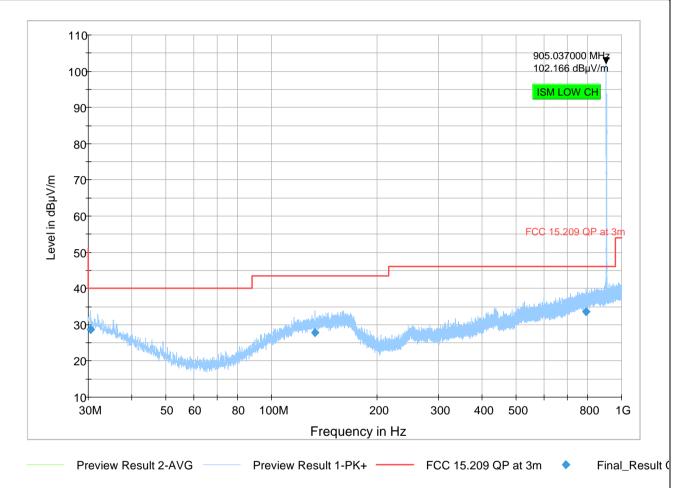


8.6.5 **Measurement Plots:**

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| Plot # 1 | | | | | | | | | | | | |
|--------------------|-----------------------|-------------------|----------------|--------------------|-----------------|-------------|-----|---------------|-----------------|--|--|--|
| Frequency (MHz) | QuasiPeak (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB/m) | | | |
| 30.49 | 28.67 | 40.00 | 11.33 | 500.0 | 120.0 | 100.0 | Н | 13.0 | 24.5 | | | |
| 133.24 | 27.81 | 43.50 | 15.69 | 500.0 | 120.0 | 135.0 | ٧ | 135.0 | 24.8 | | | |
| 792.36 | 33.71 | 46.02 | 12.31 | 500.0 | 120.0 | 247.0 | ٧ | 299.0 | 30.6 | | | |

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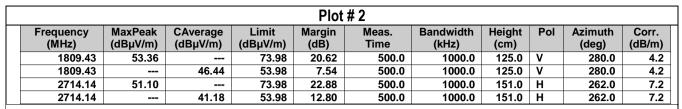
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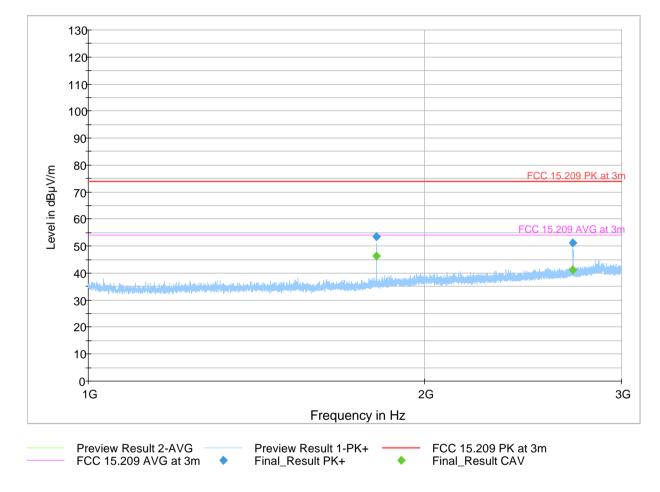
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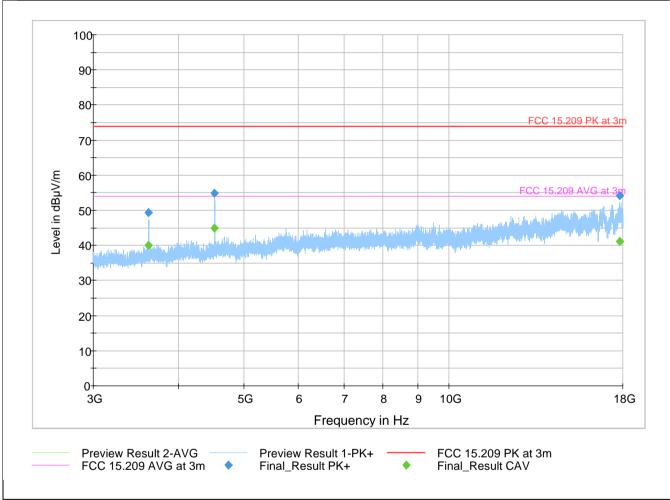
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| | Plot # 3 | | | | | | | | | | | | |
|--------------------|---------------------|----------------------|-------------------|----------------|---------------|-----------------|-------------|-----|---------------|-----------------|--|--|--|
| Frequency (MHz) | MaxPeak (dBµV/m) | CAverage (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Meas. Time | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB/m) | | | |
| 3619.50 | 49.26 | | 73.98 | 24.72 | 500.0 | 1000.0 | 100.0 | ٧ | 201.0 | -6.0 | | | |
| 3619.50 | | 39.94 | 53.98 | 14.04 | 500.0 | 1000.0 | 100.0 | ٧ | 201.0 | -6.0 | | | |
| 4525.25 | 54.96 | | 73.98 | 19.02 | 500.0 | 1000.0 | 161.0 | ٧ | 256.0 | -3.9 | | | |
| 4525.25 | | 44.99 | 53.98 | 8.99 | 500.0 | 1000.0 | 161.0 | ٧ | 256.0 | -3.9 | | | |
| 17792.25 | | 41.25 | 53.98 | 12.73 | 500.0 | 1000.0 | 167.0 | ٧ | 85.0 | 17.6 | | | |
| 17792.25 | 54.14 | | 73.98 | 19.84 | 500.0 | 1000.0 | 167.0 | ٧ | 85.0 | 17.6 | | | |



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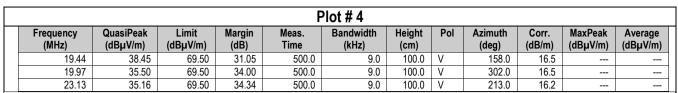
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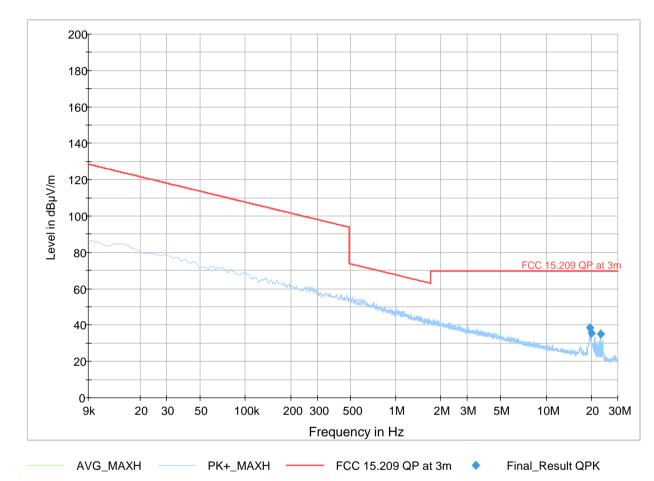
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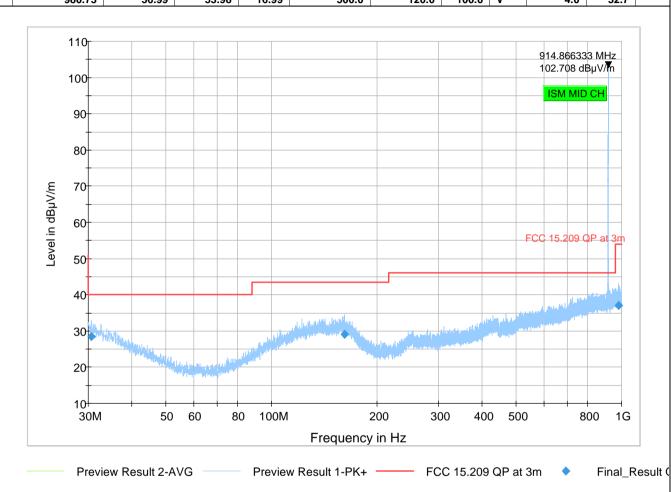
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| | | | | Plot # 5 | | | | | |
|--------------------|-----------------------|-------------------|----------------|--------------------|-----------------|-------------|-----|---------------|-----------------|
| Frequency (MHz) | QuasiPeak (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB/m) |
| 30.68 | 28.51 | 40.00 | 11.49 | 500.0 | 120.0 | 116.0 | Н | 128.0 | 24.4 |
| 161.31 | 29.07 | 43.50 | 14.43 | 500.0 | 120.0 | 194.0 | ٧ | 209.0 | 26.4 |
| 980.73 | 36.99 | 53.98 | 16.99 | 500.0 | 120.0 | 100.0 | ٧ | 4.0 | 32.7 |



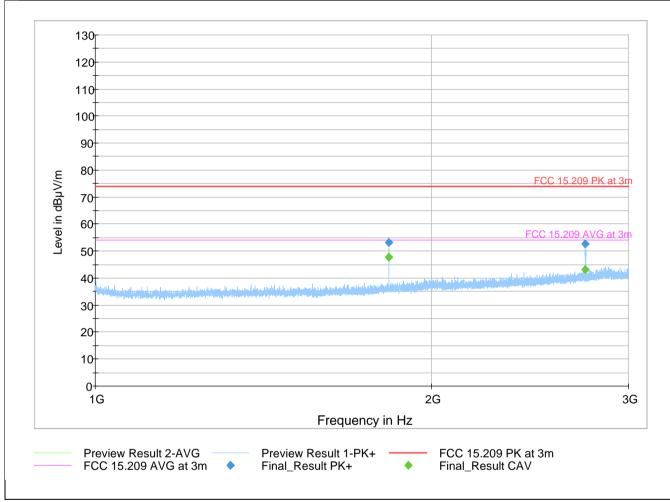
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| | Plot # 6 | | | | | | | | | | | | |
|--|----------|----------|----------|-------|-------|--------|-------|---|-------|--------|--|--|--|
| Frequency MaxPeak CAverage Limit Margin Meas. Bandwidth Height Pol Azimuth Corr. | | | | | | | | | | | | | |
| (MHz) | (dBµV/m) | (dBµV/m) | (dBµV/m) | (dB) | Time | (kHz) | (cm) | | (deg) | (dB/m) | | | |
| 1830.29 | 53.29 | | 73.98 | 20.69 | 500.0 | 1000.0 | 107.0 | ٧ | 293.0 | 4.4 | | | |
| 1830.29 | | 47.83 | 53.98 | 6.15 | 500.0 | 1000.0 | 107.0 | ٧ | 293.0 | 4.4 | | | |
| 2744.14 | 52.62 | | 73.98 | 21.36 | 500.0 | 1000.0 | 100.0 | Н | 279.0 | 7.3 | | | |
| 2744.14 | | 43.10 | 53.98 | 10.88 | 500.0 | 1000.0 | 100.0 | Н | 279.0 | 7.3 | | | |



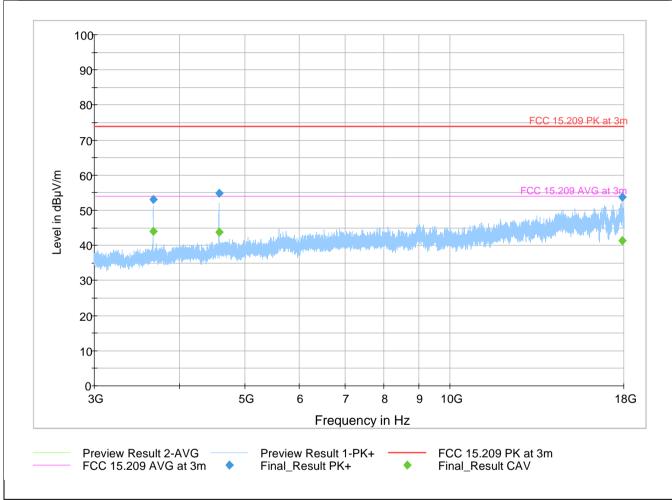
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| | Plot # 7 | | | | | | | | | | | | |
|--------------------|---------------------|----------------------|-------------------|----------------|---------------|-----------------|-------------|-----|---------------|-----------------|--|--|--|
| Frequency (MHz) | MaxPeak (dBµV/m) | CAverage (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Meas. Time | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB/m) | | | |
| 3660.50 | 53.04 | | 73.98 | 20.94 | 500.0 | 1000.0 | 100.0 | ٧ | 310.0 | -5.8 | | | |
| 3660.50 | | 44.02 | 53.98 | 9.96 | 500.0 | 1000.0 | 100.0 | ٧ | 310.0 | -5.8 | | | |
| 4574.75 | | 43.87 | 53.98 | 10.10 | 500.0 | 1000.0 | 179.0 | ٧ | 266.0 | -3.5 | | | |
| 4574.75 | 54.95 | | 73.98 | 19.03 | 500.0 | 1000.0 | 179.0 | ٧ | 266.0 | -3.5 | | | |
| 17882.50 | 53.73 | | 73.98 | 20.25 | 500.0 | 1000.0 | 116.0 | Н | 53.0 | 18.2 | | | |
| 17882.50 | | 41.28 | 53.98 | 12.69 | 500.0 | 1000.0 | 116.0 | Н | 53.0 | 18.2 | | | |



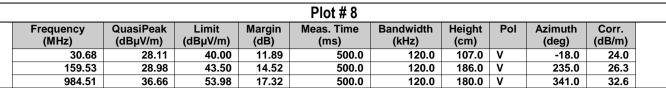
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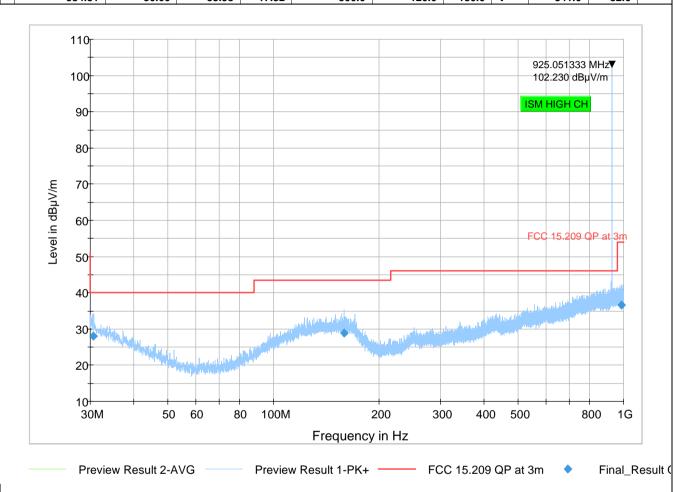
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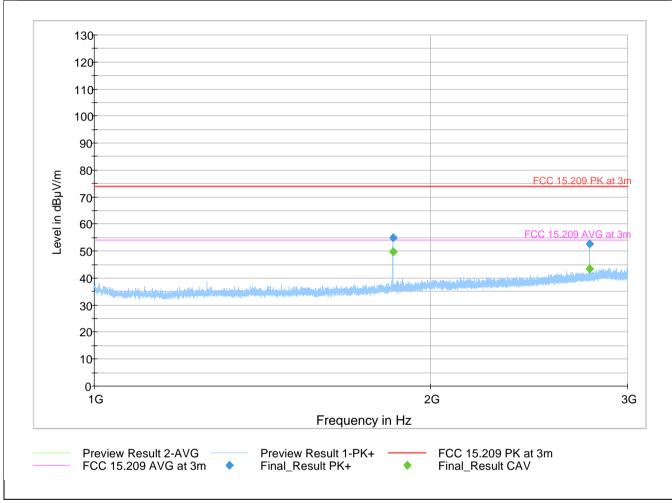
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| Plot # 9 | | | | | | | | | | | | |
|---|----------|----------|----------|-------|-------|--------|-------|---|-------|--------|--|--|
| Frequency MaxPeak CAverage Limit Margin Meas. Bandwidth Height Pol Azimuth Co | | | | | | | | | | | | |
| (MHz) | (dBµV/m) | (dBµV/m) | (dBµV/m) | (dB) | Time | (kHz) | (cm) | | (deg) | (dB/m) | | |
| 1850.29 | 54.99 | | 73.98 | 18.99 | 500.0 | 1000.0 | 125.0 | ٧ | 273.0 | 4.5 | | |
| 1850.29 | | 49.64 | 53.98 | 4.34 | 500.0 | 1000.0 | 125.0 | ٧ | 273.0 | 4.5 | | |
| 2775.57 | 52.54 | | 73.98 | 21.44 | 500.0 | 1000.0 | 107.0 | Н | 273.0 | 7.4 | | |
| 2775.57 | | 43.29 | 53.98 | 10.69 | 500.0 | 1000.0 | 107.0 | Н | 273.0 | 7.4 | | |



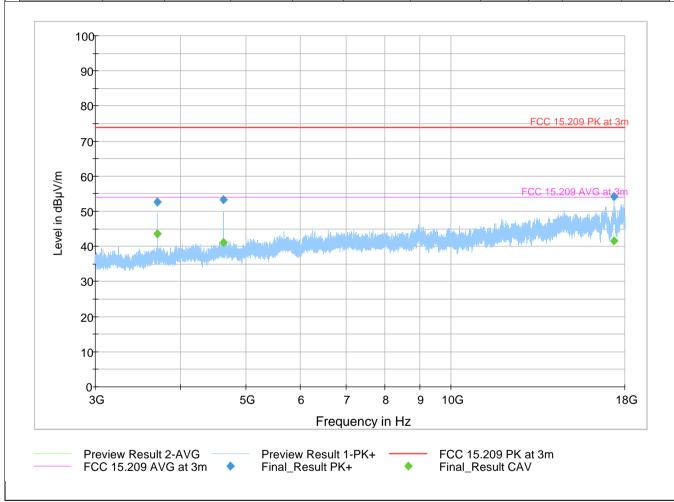
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| Plot # 10 | | | | | | | | | | | | |
|--------------------|---------------------|----------------------|-------------------|----------------|---------------|-----------------|-------------|-----|---------------|-----------------|--|--|
| Frequency (MHz) | MaxPeak (dBµV/m) | CAverage (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Meas. Time | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB/m) | | |
| 3700.50 | 52.56 | | 73.98 | 21.42 | 500.0 | 1000.0 | 100.0 | Н | 232.0 | -5.4 | | |
| 3700.50 | | 43.68 | 53.98 | 10.30 | 500.0 | 1000.0 | 100.0 | Н | 232.0 | -5.4 | | |
| 4623.50 | | 41.04 | 53.98 | 12.94 | 500.0 | 1000.0 | 126.0 | Н | 192.0 | -3.3 | | |
| 4623.50 | 53.31 | | 73.98 | 20.67 | 500.0 | 1000.0 | 126.0 | Н | 192.0 | -3.3 | | |
| 17365.00 | 54.16 | | 73.98 | 19.82 | 500.0 | 1000.0 | 275.0 | Н | -45.0 | 15.9 | | |
| 17365.00 | | 41.49 | 53.98 | 12.49 | 500.0 | 1000.0 | 275.0 | Н | -45.0 | 15.9 | | |



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9 <u>Test setup photos</u>

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Setup photos are included in supporting file name: "EMC_TELUL_222_24001_FCC_Setup_Photos"

10 Test Equipment And Ancillaries Used For Testing

| Equipment Type | Manufacturer | Model | Serial # | Calibration Cycle | Last Calibration Date |
|---------------------------|-----------------|-----------|-----------|-------------------|-----------------------|
| ACTIVE LOOP ANTENNA | ETS LINDGREN | 6507 | 00161344 | 3 YEARS | 10/30/2020 |
| BILOG ANTENNA | ETS.LINDGREN | 3142E | 00166067 | 3 YEARS | 03/12/2020 |
| HORN ANTENNA | EMCO | 3115 | 00035114 | 3 YEARS | 08/10/2020 |
| HORN ANTENNA | ETS.LINDGREN | 3117 | 00215984 | 3 YEARS | 01/31/2021 |
| TEST RECEIVER | R&S | ESU40 | 100251 | 3 YEARS | 09/13/2021 |
| COMPACT DIGITAL BAROMETER | CONTROL COMPANY | 10510-922 | 200236891 | 3 YEARS | 04/13/2020 |
| DIGITAL THRMOMETER | CONTROL COMPANY | 36934-164 | 181230565 | 3 YEARS | 01/10/2019 |

Note: Equipment used meets the measurement uncertainty requirements as required per applicable standards for 95% confidence levels. Calibration due dates, unless defined specifically, falls on the last day of the month. Items indicated "N/A" for cal status either do not specifically require calibration or is internally characterized before use.

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11 History

| Date | Report Name | Changes to report | Prepared by |
|------------|------------------------------------|-------------------|-------------|
| 2024-05-28 | EMC_TELUL_222_24001_FCC_15_247_ISM | Initial Version | Cheng Song |

<<< The End >>>