

## TEST REPORT



Applicant	Smart Technologies & Investment Ltd.
Address:	Units C & D, 18/F Spectrum Tower, No. 53 Hung To Road, Kwun Tong, Kowloon, Hong Kong

Manufacturer or Supplier	Smart Electronic Industrial (Dong Guan) Co., Ltd.
Address	Qing Long Road, Long Jian Tian-Cun, Huang Jiang-Zhen, Dong Guan, Guang Dong, China
Product:	KeyPad Control
Brand Name:	GTO MIGHTY MULE , GTO / ACCESS - GTO / PRO
Model:	MMKPD
Additional Model & Model Difference:	FM137-G4, See section 3.1 NOTE
Date of tests:	Mar. 12, 2013~ Mar. 20, 2013

the tests have been carried out according to the requirements of the following standards:

**FCC Part 15, Subpart C (Section 15.231a)**

**CONCLUSION: The submitted sample was found to COMPLY with the test requirement**

Prepared by Glyn He Project Engineer / EMC Department	Approved by Sam Tung Manager / EMC Department
	  Date: Mar. 20, 2013

This report is for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence, provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents. Unless specific mention, the uncertainty of measurement has been explicitly taken into account to declare the compliance or non-compliance to the specification

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**BUREAU  
VERITAS**

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**BUREAU  
VERITAS**

Test Report No.: RF130311N036

## RELEASE CONTROL RECORD

ISSUE NO.	REASON FOR CHANGE	DATE ISSUED
RF130311N036	Original release	Mar. 20, 2013



# 1 SUMMARY OF TEST RESULTS

The EUT has been tested according to the following specifications:

APPLIED STANDARD: FCC PART 15, SUBPART C (SECTION 15.231)			
STANDARD SECTION	TEST TYPE AND LIMIT	RESULT	REMARK
§15.203	Antenna Requirement	PASS	Compliant
§15.207 (a)	AC Power Conducted Emission	N/A	N/A
§15.209 §15.231(b)	Radiated Emission	PASS	Compliant
§15.231 (a)	Deactivation Testing	PASS	Compliant
§15.231(c)	Emission Bandwidth Measurement	PASS	Compliant

# 2 MEASUREMENT UNCERTAINTY

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the EUT as specified in CISPR 16-4-2:

MEASUREMENT	FREQUENCY	UNCERTAINTY
Conducted emissions	9kHz~30MHz	2.94dB
Radiated emissions	30MHz ~ 1000MHz	3.6419dB
	1GHz ~ 18GHz	2.2dB
	18GHz ~ 40GHz	1.94dB

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k = 2.

### 3 GENERAL INFORMATION

#### 3.1 GENERAL DESCRIPTION OF EUT

<b>PRODUCT</b>	KeyPad Control
<b>MODEL NO.</b>	MMKPD
<b>FCC ID</b>	N9KGTOMMKPD
<b>NOMINAL VOLTAGE</b>	DC 4.5V from Battery
<b>MODULATION TYPE</b>	ASK
<b>OPERATING FREQUENCY</b>	318MHz
<b>NUMBER OF CHANNEL</b>	1
<b>ANTENNA TYPE</b>	Integral PCB Antenna
<b>I/O PORTS</b>	N/A

#### NOTE:

- Additional model FM137-G4 is identical with the test model MMKPD except the model number for marketing purpose.
- For a more detailed features description, please refer to the manufacturer's specifications or the User's Manual.
- For the test results, the EUT had been tested with all conditions. But only the worst case was showed in test report.

#### 3.2 DESCRIPTION OF TEST MODES

Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations, data rates, XYZ axis and antenna ports

The worst case was found when positioned on Y-Z plane for radiated emission. Following channel(s) was (were) selected for the final test as listed below:

FREQUENCY	TEST MODES
318MHz	Transmitting

### 3.3 TEST MODE APPLICABILITY AND TESTED CHANNEL DETAIL

EUT CONFIGURE MODE	APPLICABLE TO					DESCRIPTION
	RE ≥ 1G	RE < 1G	PLC	EB	DT	
-	√	√	-	√	√	-

Where **RE ≥ 1G**: Radiated Emission above 1GHz      **RE < 1G**: Radiated Emission below 1GHz  
**PLC**: Power Line Conducted Emission      **EB**: 20dB Bandwidth measurement  
**DT**: Deactivation Time measurement

#### POWER LINE CONDUCTED EMISSION TEST:

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations, data rates and antenna ports (if EUT with antenna diversity architecture).
- Following channel(s) was (were) selected for the final test as listed below.

AVAILABLE CHANNEL	TESTED CHANNEL	MODULATION TYPE
1	1	ASK

#### RADIATED EMISSION TEST (ABOVE 1 GHz):

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations.
- Following channel(s) was (were) selected for the final test as listed below.

AVAILABLE CHANNEL	TESTED CHANNEL	MODULATION TYPE
1	1	ASK

#### RADIATED EMISSION TEST (BELOW 1 GHz):

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations.
- Following channel(s) was (were) selected for the final test as listed below.

AVAILABLE CHANNEL	TESTED CHANNEL	MODULATION TYPE
1	1	ASK

**EMISSION BANDWIDTH MEASUREMENT:**

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations.
- Following channel(s) was (were) selected for the final test as listed below.

AVAILABLE CHANNEL	TESTED CHANNEL	MODULATION TYPE
1	1	ASK

**DEACTIVATION TIME MEASUREMENT:**

- Pre-Scan has been conducted to determine the worst-case mode from all possible combinations between available modulations.
- Following channel(s) was (were) selected for the final test as listed below.

AVAILABLE CHANNEL	TESTED CHANNEL	MODULATION TYPE
1	1	ASK

**TEST CONDITION:**

APPLICABLE TO	ENVIRONMENTAL CONDITIONS	INPUT POWER	TESTED BY
PLC	N/A	N/A	N/A
RE $\geq$ 1G	23deg. C, 60%RH	DC 4.5V By Battery	Glyn He
RE $<$ 1G	23deg. C, 60%RH	DC 4.5V By Battery	Glyn He
EB	23deg. C, 63%RH	DC 4.5V By Battery	Glyn He
DT	23deg. C, 63%RH	DC 4.5V By Battery	Glyn He



### 3.4 GENERAL DESCRIPTION OF APPLIED STANDARDS

The EUT is a RF Product. According to the specifications of the manufacturer, it must comply with the requirements of the following standards:

**FCC Part 15, Subpart C (15.231a)**

**ANSI C63.4-2009**

All test items have been performed and recorded as per the above standards.

### 3.5 DESCRIPTION OF SUPPORT UNITS

The EUT has been tested as an independent unit together with other necessary accessories or support units. The following support units or accessories were used to form a representative test configuration during the tests.

NO.	PRODUCT	BRAND	MODEL NO.	SERIAL NO.	FCC ID
1	N/A	N/A	N/A	N/A	NA

NO.	SIGNAL CABLE DESCRIPTION OF THE ABOVE SUPPORT UNITS
1	N/A

## 4. TEST TYPES AND RESULTS

### 4.1 RADIATED EMISSION MEASUREMENT

#### 4.1.1 LIMITS OF RADIATED EMISSION MEASUREMENT

Emissions radiated outside of the specified bands, shall be according to the general radiated limits in 15.209 as following:

FREQUENCIES (MHz)	FIELD STRENGTH (microvolts/meter)	MEASUREMENT DISTANCE (meters)
0.009 ~ 0.490	2400/F(kHz)	300
0.490 ~ 1.705	24000/F(kHz)	30
1.705 ~ 30.0	30	30
30 ~ 88	100	3
88 ~ 216	150	3
216 ~ 960	200	3
Above 960	500	3

According to §15.231(b), the field strength of emissions from intentional radiators operated within these frequency bands shall comply with the following:

Fundamental frequency (MHz)	Field strength of fundamental (microvolts/meter)	Field strength of spurious emission (microvolts/meter)
40.66–40.70	2,250	225
70–130	1,250	125
130–174	<sup>1</sup> 1,250 to 3,750	<sup>1</sup> 125 to 375
174–260	3,750	375
260–470	<sup>1</sup> 3,750 to 12,500	<sup>1</sup> 375 to 1,250
Above 470	12,500	1,250

**NOTE:**

- <sup>1</sup> Linear interpolations.
- The lower limit shall apply at the transition frequencies.
- Emission level (dBuV/m) = 20 log Emission level (uV/m).
- As shown in 15.35(b), for frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits, specified above by more than 20dB under any condition of modulation.



**4.1.2 TEST INSTRUMENTS**

<b>DESCRIPTION &amp; MANUFACTURER</b>	<b>MODEL NO.</b>	<b>SERIAL NO.</b>	<b>DATE OF CALIBRATION</b>	<b>DUE DATE OF CALIBRATION</b>
Spectrum Analyzer Agilent	E4446A	MY46180622	May 02, 12	May 01, 13
Test Receiver ROHDE & SCHWARZ	ESVD	847398/003	May 15,12	May 14,13
Bilog Antenna TESEQ	CBL 6111D	27089	July 16,12	July 15,13
Horn Antenna EMCO	3117	00062558	Oct.18,12	Oct.17,13
RF Cable IMRO	IMRO-400	10m Cable 1#10m	May 16,12	May 15,13
RF Cable IMRO	IMRO-400	10m Cable 2#3m	May 16,12	May 15,13
Signal Amplifier EMCI	EMC330	980095	Nov. 02,12	Nov. 01,13
Signal Amplifier HP	8449B	3008A00409	May 31,12	May 30,13
RF Cable DRAKA	M06/25-RG102	10m Cable 2#	May 16,12	May 15,13
Test software	ADT_Radiated_V7. 6.15	N/A	N/A	N/A

- NOTE:**
1. The calibration interval of the above test instruments is 12 months and the calibrations are traceable to CEPREI/CHINA and NIM/CHINA.
  2. The test was performed in Dongguan Chamber 10m.
  3. The horn antenna are used only for the measurement of emission frequency above 1GHz if tested.

#### 4.1.3 TEST PROCEDURES

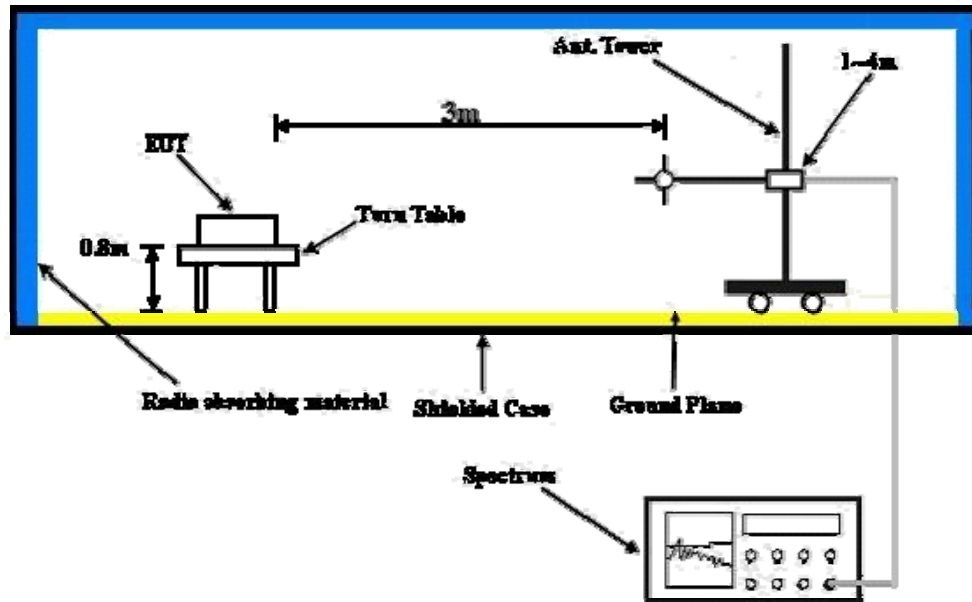
The basic test procedure was in accordance with ANSI C63.4 (section 12).

- a. The EUT was placed on the top of a rotating table 0.8 meters above the ground at a 3 meters Semi-anechoic chamber room. The table was rotated 360 degrees to determine the position of the highest radiation.
- b. The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. The height of antenna is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are set to make the measurement.
- d. For each suspected emission, the EUT was arranged to its worst case and then the antenna was tuned to heights from 1 meter to 4 meters and the rotatable table was turned from 0 degrees to 360 degrees to find the maximum reading.
- e. The test-receiver system was set to peak detect function and specified bandwidth with maximum hold mode when the test frequency is below 1 GHz.
- f. During the test, each emission was maximized by: having the EUT continuously working, investigated all operating modes, rotated about all 3 axis (X, Y & Z) and considered typical configuration to obtain worst position, manipulating interconnecting cables, For battery operated equipment, the equipment tests shall be perform using fresh batteries. The turntable was rotated to maximize the emission level.

#### 4.1.4 DEVIATION FROM TEST STANDARD

No deviation

#### 4.1.5 TEST SETUP



For the actual test configuration, please refer to the attached file (Test Setup Photo).

#### 4.1.6 EUT OPERATING CONDITIONS

- Placed the EUT on the testing table.
- Enable EUT under transmission condition continuously at specific channel frequency.

#### 4.1.7 TEST RESULTS

##### BELOW 1GHz WORST-CASE DATA: Transmitting

ANTENNA POLARITY & TEST DISTANCE: HORIZONTAL AT 3M								
No.	Freq. (MHz)	Correction Factor (dB/m)	Raw Value (dBuV)	Emission Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Antenna Height (cm)	Table Angle (Degree)
1	46.07 PK	11.18	5.47	16.65	40	-23.35	100	84
2	112.37 PK	12.19	2.91	15.1	43.5	-28.4	100	106
3	318 PK	15.38	66.34	81.72	95.8	-14.08	150	211
4	318 AV	-20.92	-	60.8	75.8	-15	-	-
5	636.27 PK	23.16	34.99	58.15	75.8	-17.65	150	234
6	636.27 AV	-20.92	-	37.23	55.8	-18.57	-	-
7	953.21 PK	28.21	31.81	60.02	75.8	-15.78	150	252
8	953.21 AV	-20.92	-	39.1	55.8	-16.7	-	-
ANTENNA POLARITY & TEST DISTANCE: VERTICAL AT 3M								
No.	Freq. (MHz)	Correction Factor (dB/m)	Raw Value (dBuV)	Emission Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Antenna Height (cm)	Table Angle (Degree)
1	75.18 PK	8.08	2.19	10.27	40	-29.73	100	114
2	97.81 PK	10.82	7.28	18.1	43.5	-25.4	100	70
3	318 PK	15.38	56.85	72.23	95.8	-23.57	100	325
4	318 AV	-20.92	-	51.31	75.8	-24.49	-	-
5	636.27 PK	23.16	31.7	54.86	75.8	-20.94	100	343
6	636.27 AV	-20.92	-	33.94	55.8	-21.86	-	-
7	953.21 PK	28.21	25.42	53.63	75.8	-22.17	100	358
8	953.21 AV	-20.92	-	32.71	55.8	-23.09	-	-

#### NOTE:

1. The resolution bandwidth of test receiver/spectrum analyzer is 120kHz for Peak detection (PK) at frequency below 1GHz.
2. Emission level(dBuV/m)=Raw Value(dBuV) + Correction Factor(dB/m)
3. Correction Factor(dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
4. Margin value = Emission level – Limit value.
5. Fundamental AV value =PK Emission +20\*log(duty cycle)Where the duty factor is calculated from following formula:20 log (Duty cycle) = 20 log (18\*05 ms / 100 ms) = -20.92 dB  
Please see page 16~17 for plotted duty.

**ABOVE 1GHz WORST-CASE DATA: Transmitting**

<b>ANTENNA POLARITY &amp; TEST DISTANCE: HORIZONTAL AT 3M</b>								
No.	Freq. (MHz)	Correction Factor (dB/m)	Raw Value (dBuV)	Emission Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Antenna Height (cm)	Table Angle (Degree)
1	1272 PK	26.04	36.93	62.97	74	-11.03	106	332
	1272 AV	-20.92	-	42.05	54	-11.95	-	-
2	1590 PK	28.34	30.17	58.51	74	-15.49	122	356
	1590 AV	-20.92	-	37.59	54	-16.41	-	-
3	2226 PK	34.95	16.4	51.35	74	-22.65	123	0
	2226 AV	-20.92	-	30.43	54	-23.57	-	-
<b>ANTENNA POLARITY &amp; TEST DISTANCE: VERTICAL AT 3M</b>								
No.	Freq. (MHz)	Correction Factor (dB/m)	Raw Value (dBuV)	Emission Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Antenna Height (cm)	Table Angle (Degree)
1	1272 PK	26.04	38.74	64.78	74	-9.22	118	352
	1272 AV	-20.92	-	43.86	54	-10.14	-	-
2	1590 PK	28.34	38.49	66.83	74	-7.17	184	277
	1590 AV	-20.92	-	45.91	54	-8.09	-	-
3	2226 PK	34.95	20.37	55.32	74	-18.68	100	0
	2226 AV	-20.92	-	34.4	54	-19.6	-	-

**NOTE:**

- 1 The resolution bandwidth of test receiver/spectrum analyzer is 1MHz for Peak detection (PK) at frequency above 1GHz.
- 2 Emission level(dBuV/m)=Raw Value(dBuV) + Correction Factor(dB/m)
- 3 Correction Factor(dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
- 4 Margin value = Emission level – Limit value.
- 5 Fundamental AV value =PK Emission +20\*log(duty cycle)Where the duty factor is calculated from following formula:20 log (Duty cycle) = 20 log (18\*0.5 ms / 100 ms) = -20.92 dB  
Please see page 16~17 for plotted duty.

### Duty Cycle:

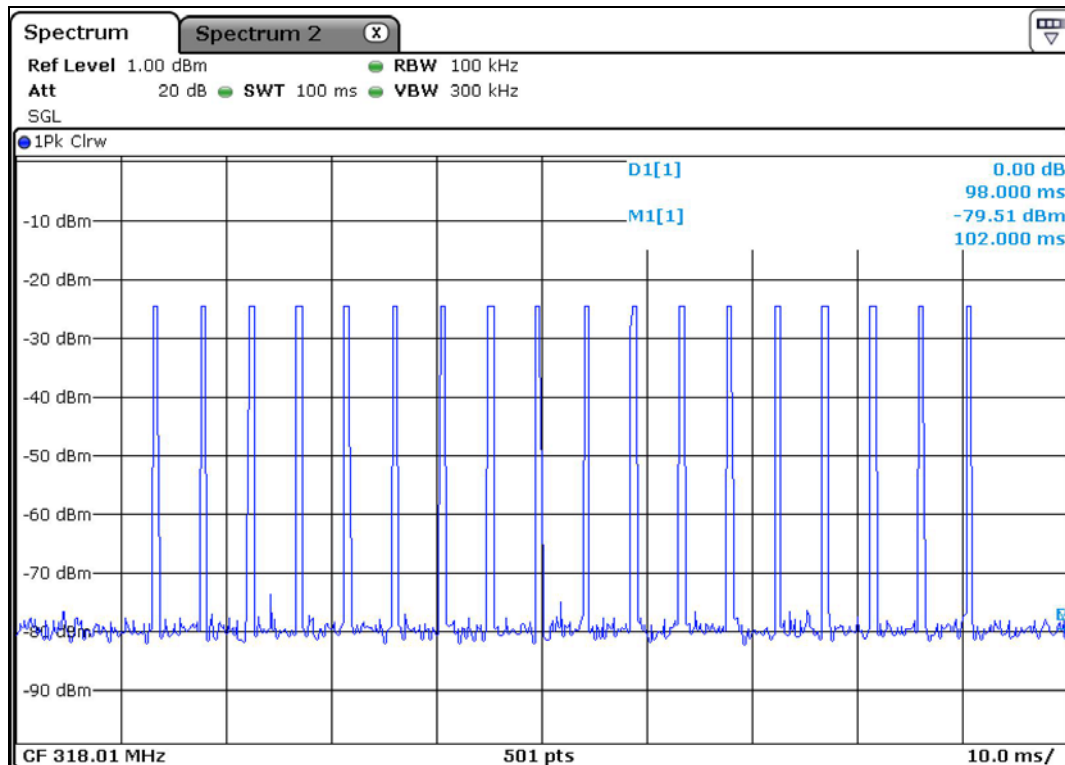
$$T_p = 100\text{ms}$$

$$T_{on} = 18 \times 0.5\text{ms} = 9\text{ms}$$

$$\text{Duty Cycle} = T_{on} / T_p \times 100\% = 9/100 = 9\%$$

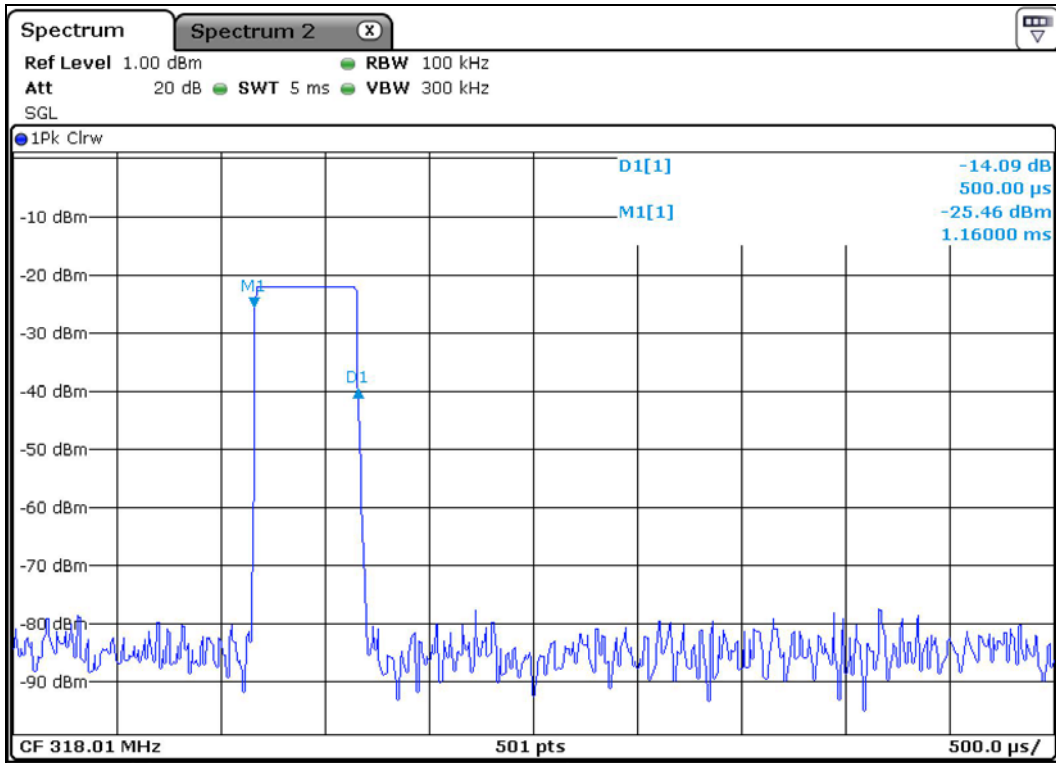
$$\text{Factor} = 20 \times \text{Log} (T_{on}/T_p) = -20.92 \text{ dB}$$

*T<sub>p</sub>*





$T_{on} = 18 * 0.5ms = 9ms$



## 4.2 20dB BANDWIDTH MEASUREMENT

### 4.2.1 LIMITS OF 20dB BANDWIDTH MEASUREMENT

According to FCC 15.231(c), The bandwidth of the emission shall be no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz. Bandwidth is determined at the points 20 dB down from the modulated carrier.

$$\text{Limit} = \text{Fundamental Frequency} \times 0.25\% = 318\text{MHz} \times 0.25\% = 795 \text{ kHz}$$

### 4.2.2 TEST INSTRUMENTS

DESCRIPTION & MANUFACTURER	MODEL NO.	SERIAL NO.	DATE OF CALIBRATION	DUE DATE OF CALIBRATION
Spectrum Analyzer Agilent	E4446A	MY46180622	May 02, 12	May 01, 13
Test Receiver ROHDE & SCHWARZ	ESVD	847398/003	May 15,12	May 14,13
Bilog Antenna TESEQ	CBL 6111D	27089	July 16,12	July 15,13
RF Cable IMRO	IMRO-400	10m Cable 1#10m	May 16,12	May 15,13
RF Cable IMRO	IMRO-400	10m Cable 2#3m	May 16,12	May 15,13
Signal Amplifier EMCI	EMC330	980095	Nov. 02,12	Nov. 01,13
RF Cable DRAKA	M06/25-RG102	10m Cable 2#	May 16,12	May 15,13
Test software	ADT_Radiated_V7. 6.15	N/A	N/A	N/A

- NOTE:** 1. The calibration interval of the above test instruments is 12 months and the calibrations are traceable to CEPREI/CHINA and NIM/CHINA
2. The test was performed in Dongguan Chamber 10m

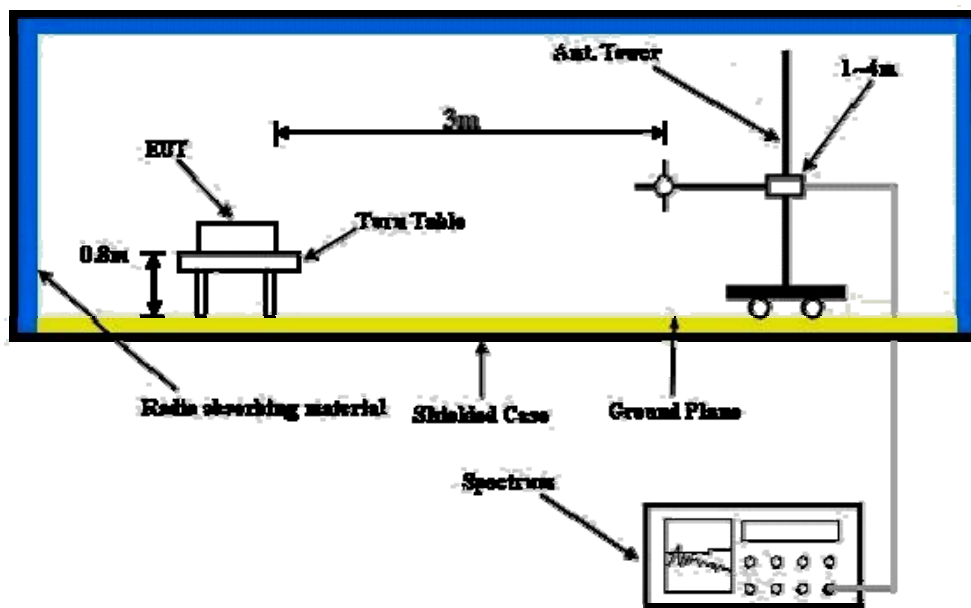
#### 4.2.3 TEST PROCEDURE

The spectrum analyzer was receiving the maximum emission level. The 20dB bandwidth is defined as the total spectrum the power of which is higher than peak power minus 20dB.

#### 4.2.4 DEVIATION FROM TEST STANDARD

No deviation.

#### 4.2.5 TEST SETUP



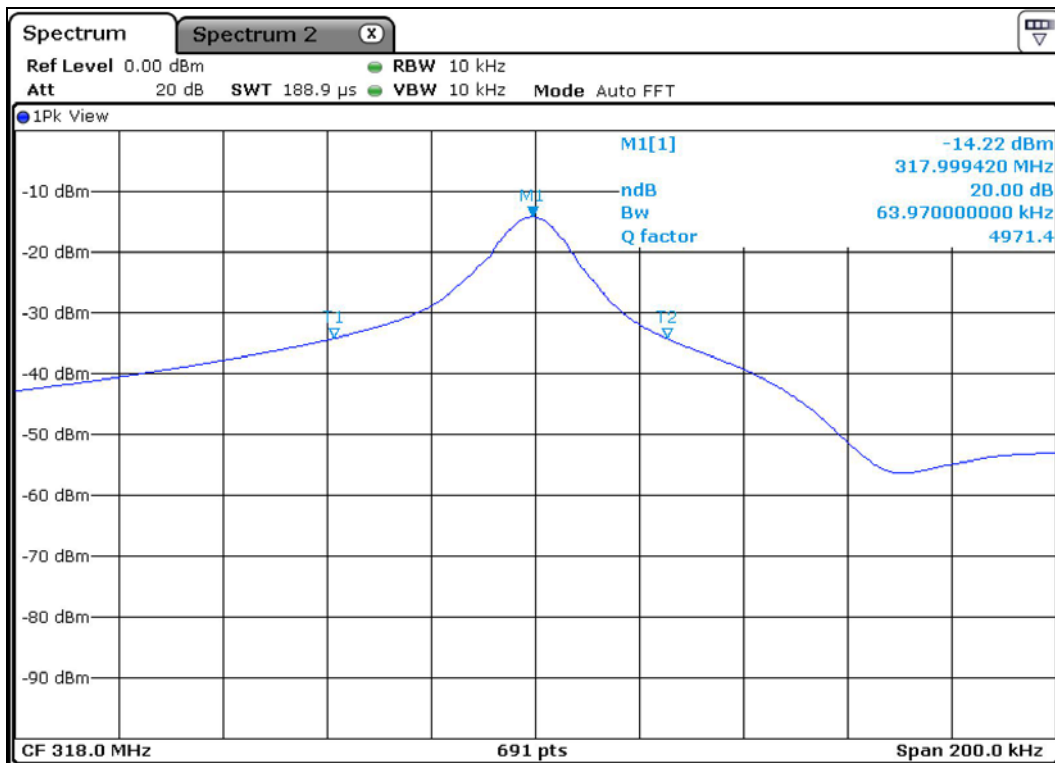
#### 4.2.6 EUT OPERATING CONDITIONS

- Placed the EUT on the testing table.
- Enable EUT under transmission condition continuously at specific channel frequency.

#### 4.2.7 TEST RESULTS

FREQUENCY (MHz)	20dB BANDWIDTH (kHz)	MAXIMUM LIMIT (kHz)	PASS/FAIL
318	63.97	795	PASS

**Test Data:**



### 4.3 DEACTIVATION TEST

#### 4.3.1 LIMITS OF DEACTIVATION TEST

15.231 (a)(1) A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released.

15.231 (a)(2) A transmitter activated automatically shall cease transmission within 5 seconds after activation.

#### 4.3.2 TEST INSTRUMENTS

DESCRIPTION & MANUFACTURER	MODEL NO.	SERIAL NO.	DATE OF CALIBRATION	DUE DATE OF CALIBRATION
Spectrum Analyzer Agilent	E4446A	MY46180622	May 02, 12	May 01, 13
Test Receiver ROHDE & SCHWARZ	ESVD	847398/003	May 15,12	May 14,13
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RF Cable IMRO	IMRO-400	10m Cable 2#3m	May 16,12	May 15,13
Signal Amplifier EMCI	EMC330	980095	Nov. 02,12	Nov. 01,13
RF Cable DRAKA	M06/25-RG102	10m Cable 2#	May 16,12	May 15,13
Test software	ADT_Radiated_V7. 6.15	N/A	N/A	N/A

**NOTE:** 1. The calibration interval of the above test instruments is 12 months and the calibrations are traceable to CEPREI/CHINA and NIM/CHINA

2. The test was performed in Dongguan Chamber 10m

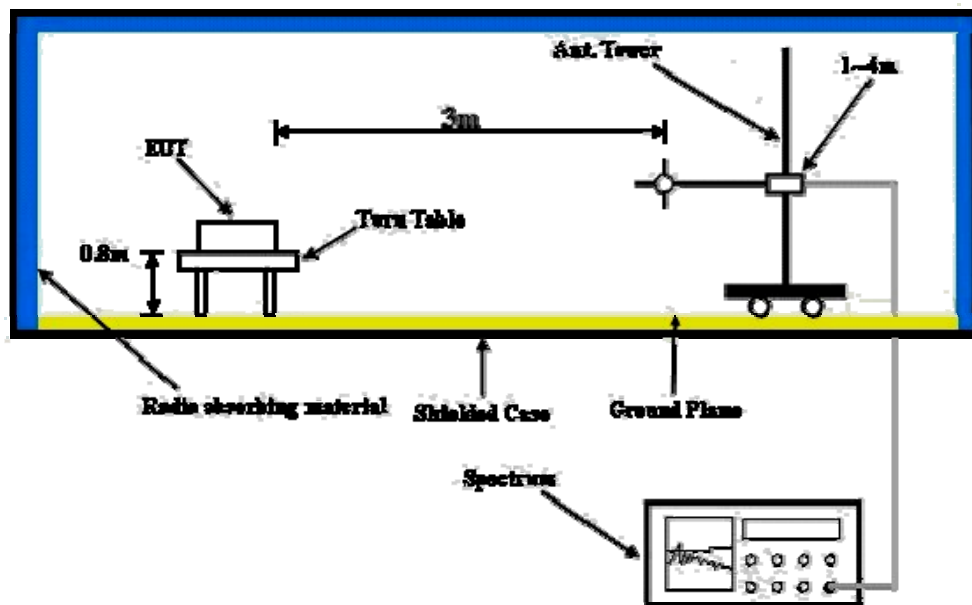
#### 4.3.3 TEST PROCEDURE

With the EUT's antenna attached, the EUT's output signal was received by the test antenna, which was connected to the spectrum analyzer. Set the center frequency to 318MHz, then set the spectrum analyzer to Zero Span for the release time reading. During the testing, the transmission duration was measured and recorded.

#### 4.3.4 DEVIATION FROM TEST STANDARD

No deviation.

#### 4.3.5 TEST SETUP



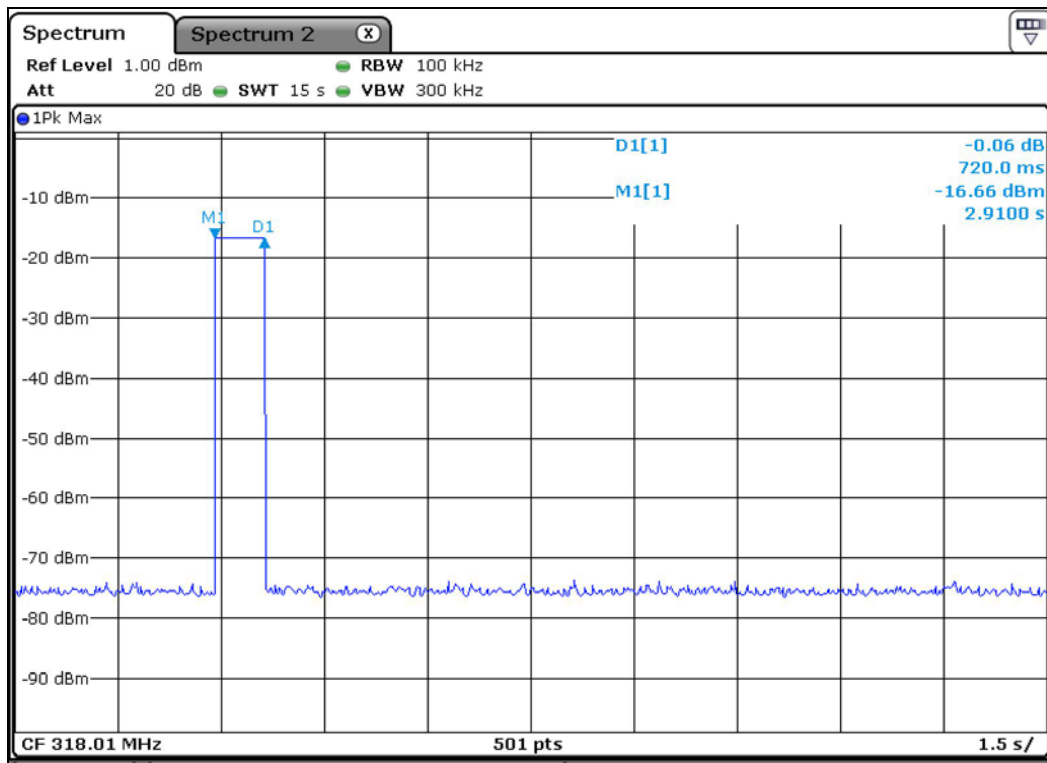
#### 4.3.6 EUT OPERATING CONDITIONS

- Placed the EUT on the testing table.
- Enable EUT under transmission condition continuously at specific channel frequency.

### 4.3.7 TEST RESULTS

PUSH BUTTON	FREQUENCY (MHz)	MAXIMUM LIMIT (sec)	PASS/FAIL
1	318	5	PASS

The plots of test results are attached as below.





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## 5 PHOTOGRAPHS OF THE TEST CONFIGURATION

Please refer to the attached file (Test Setup Photo).





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## 6 APPENDIX A - MODIFICATIONS RECORDERS FOR ENGINEERING CHANGES TO THE EUT BY THE LAB

No any modifications are made to the EUT by the lab during the test.

---END---