

Report on the IC Testing of the
IEE S.A.
Radar Sensor. Model: VitaSense
In accordance with CFR 47, Part 15, Subpart C

Prepared for: IEE S.A.
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FCC ID: NSZVITA001

COMMERCIAL-IN-CONFIDENCE

Date: 2021-04-19

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Product Service

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|----------------------|-----------------|------------|---|
| Project Management | Alex Fink | 2021-04-19 |  SIGN-ID 495518 |
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Signatures in this approval box have checked this document in line with the requirements of TÜV SÜD Product Service document control rules.

ENGINEERING STATEMENT

The measurements shown in this report were made in accordance with the procedures described on test pages. All reported testing was carried out on a sample equipment to demonstrate limited compliance with FCC 47 CFR Part 15, Subpart C. The sample tested was found to comply with the requirements defined in the applied rules.

| RESPONSIBLE FOR | NAME | DATE | SIGNATURE |
|-----------------|-----------|------------|---|
| Testing | Alex Fink | 2021-04-19 |  SIGN-ID 495518 |

Laboratory Accreditation
DAkkS Reg. No. D-PL-11321-11-02
DAkkS Reg. No. D-PL-11321-11-03

Laboratory recognition
Registration No. BNetzA-CAB-16/21-15
3050A-2

ISED Canada test site registration

EXECUTIVE SUMMARY
A sample of this product was tested and found to be compliant with FCC 47 CFR Part 15, Subpart C, §15.255 (2018).

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Trade Register Munich
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Summary

| Prüfergebnisse / Test Results | Auftragsnummer / Order No. 2001290205 | | | |
|---|---|-----------------------------|------------------------------------|-------------------------------------|
| Die Prüfungen wurden nach folgenden Vorschriften durchgeführt: <i>Tests were performed according to:</i> CFR 47, Part 15, Subpart C, §15.255 | | | | |
| Durchgeführte Prüfung <i>Test performed</i> | Prüfergebnis <i>Test result</i> | | | |
| | Erfüllt Passed | Nicht erfüllt Not Passed | Nicht zutreffend Not applicable | Nicht durchgeführt Not performed |
| Power Density | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occupied Bandwidth | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spurious Radiated Emissions | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Frequency Stability | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Duty Cycle | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Bemerkungen / Remarks:

The VitaSense device does not meet the technical requirements described in CFR 47, Part 15, Subpart C, §15.255. Particularly, the device does not meet the 500 MHz or less occupied bandwidth within the frequency band 61-61.5 GHz, described in B (2). This technical requirement was waived.

Die Prüfergebnisse beziehen sich ausschließlich auf das zur Prüfung vorgestellte Prüfmuster. Ohne schriftliche Genehmigung des Prüflabors darf der Prüfbericht auszugsweise nicht vervielfältigt werden. *The test results relate only to the individual item which has been tested. Without the written approval of the test laboratory this report may not be reproduced in extracts.*

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Annex A to Test Report TR-06504-80561-09

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Annex B to Test Report TR-06504-80561-09

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1 Administrative Data

| Application details | |
|------------------------------|---|
| Applicant: | IEE S.A. 1, rue du Campus L-7795 Bissen Luxembourg |
| Contact person: | Mr. Jochen LANDWEHR |
| Order number: | 2001290205 |
| Receipt of EUT: | 2020-04-06 |
| Return of EUT: | --- |
| Date(s) of test: | 2020-04-06 to 2020-05-11 and 2021-03-29 |
| Note(s): | --- |
| Responsible for testing: | Mr. Alex Fink |
| Responsible for test report: | Mr. Alex Fink |
| Test report checked by: | Mr. Matthias Stumpe |

| Report details | |
|----------------|-------------------|
| Report number: | TR-06504-80561-09 |
| Edition: | 2 |
| Issue date: | 2021-04-19 |

2 Details about the Test Laboratory

Details about the Test Laboratory

| | |
|---|--|
| Company name: | TÜV SÜD Product Service GmbH |
| Address: | Äußere Frühlingstraße 45 D-94315 Straubing Germany |
| Laboratory accreditation: | DAkkS Registration No. D-PL-11321-11-02 DAkkS Registration No. D-PL-11321-11-03 |
| Laboratory recognition: | Registration No. BNetzA-CAB-16/21-15 |
| Industry Canada test site registration: | 3050A-2 |
| Contact: | Mr. Markus Biberger |
| | Phone: +49 9421 5522-0 Fax: +49 9421 5522-99 |

3 Description of the Equipment Under Test

Equipment characteristics

| | |
|-----------------------------|---|
| Type designation: | VitaSense |
| Parts of the system: | Main device: radar sensor |
| Options and accessories: | --- |
| Type of equipment: | Radar Sensor |
| Serial number: | CZ-4100 #1 |
| HVIN: | HW:330/1.00 |
| Manufacturer: | IEE S.A. |
| Power supply: | Battery supply (regulated lead-acid) Nominal: 12.0 V |
| | Nominal frequency: 0 Hz (DC) |
| Highest internal frequency: | 64 GHz for Radar |
| Version of EUT: | --- |

Marking Plate



4 Operation Mode and Configuration of EUT

Operation Mode(s)

Transmitting continuously

List of ports and cables

| No. | Description | Classification ¹ | Cable type | Cable length used | Cable length maximum ² |
|-----|--------------------------------|-----------------------------|------------|-------------------|-----------------------------------|
| D1 | DC 12 V supply | dc power | Unshielded | 2 m | --- |
| S1 | Wiring harness (CAN, Ethernet) | signal/control port | Unshielded | 2 m | --- |

List of devices connected to EUT

| No. | Description | Type designation | Serial no. or ID | Manufacturer |
|-----|-----------------------|------------------|------------------|--------------|
| 1 | USB CAN/LIN interface | VECTOR VN1610 | 007150066360 | VECTOR |

List of support devices

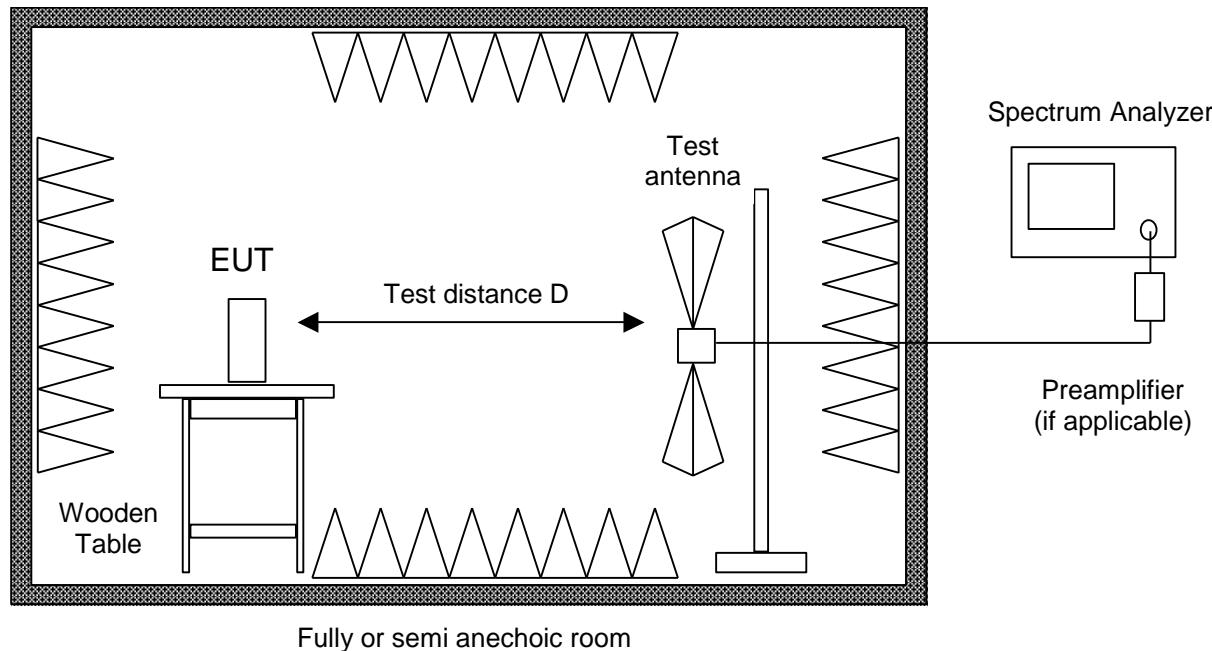
| No. | Description | Type designation | Serial no. or ID | Manufacturer |
|-----|-----------------------|------------------|------------------|--------------|
| 2 | USB CAN/LIN interface | VECTOR VN1610 | 007150066360 | VECTOR |

¹ Ports shall be classified as ac power, dc power or signal/control port.

² As specified by applicant

5 Test Setups

Radiated Emission in Fully or Semi Anechoic Room



Radiated emission in fully or semi anechoic room is measured in the frequency range from 30 MHz to the maximum frequency as specified in CFR 47 Part 15 section 15.33.

Measurements are made in both the horizontal and vertical planes of polarization using a spectrum analyzer with the detector function set to peak and resolution as well as video bandwidth set to 100 kHz (below 1 GHz) or 1 MHz (above 1 GHz).

Testing up to 1 GHz is performed with a linear polarized logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna"). For testing above 1 GHz horn antennas are used.

All tests below 8.2 GHz are performed at a test distance D of 3 meters. For higher frequencies the test distance may be reduced (e.g. to 1 meter) due to the sensitivity of the measuring instrument(s) and the test results are calculated according to CFR 47 Part 15 section 15.31(f)(1) using an extrapolation factor of 20 dB/decade. If required, preamplifiers are used for the whole frequency range. Special care is taken to avoid overload, using appropriate attenuators and filters, if necessary.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Hand-held or body-worn devices are rotated through three orthogonal axes to determine which attitude and configuration produces the highest emission relative to the limit and therefore shall be used for final testing.

During testing the EUT is rotated all around to find the maximum levels of emissions. Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

For final testing below 1 GHz a semi anechoic room complying with the NSA requirements of ANSI C63.4 for alternative test sites is used (see 0). If prescans are recorded in fully anechoic room they are indicated appropriately.

According to section 13 of KDB558074 the requirement for radiated emissions on the band edges was performed with a reduced bandwidth of 100 kHz instead of 1 MHz.

Radiated emission in the frequency range 9 kHz to 30 MHz is measured using an active loop antenna. First the whole spectrum of emission caused by the equipment is recorded at a distance of 3 meters in a fully or semi anechoic room with the detector of the spectrum analyzer or EMI receiver set to peak. This configuration is also used for recording the spectrum of intentional radiators.

Hand-held or body-worn devices are rotated through three orthogonal axes to determine which attitude and configuration produces the highest emission relative to the limit and therefore shall be used for final testing.

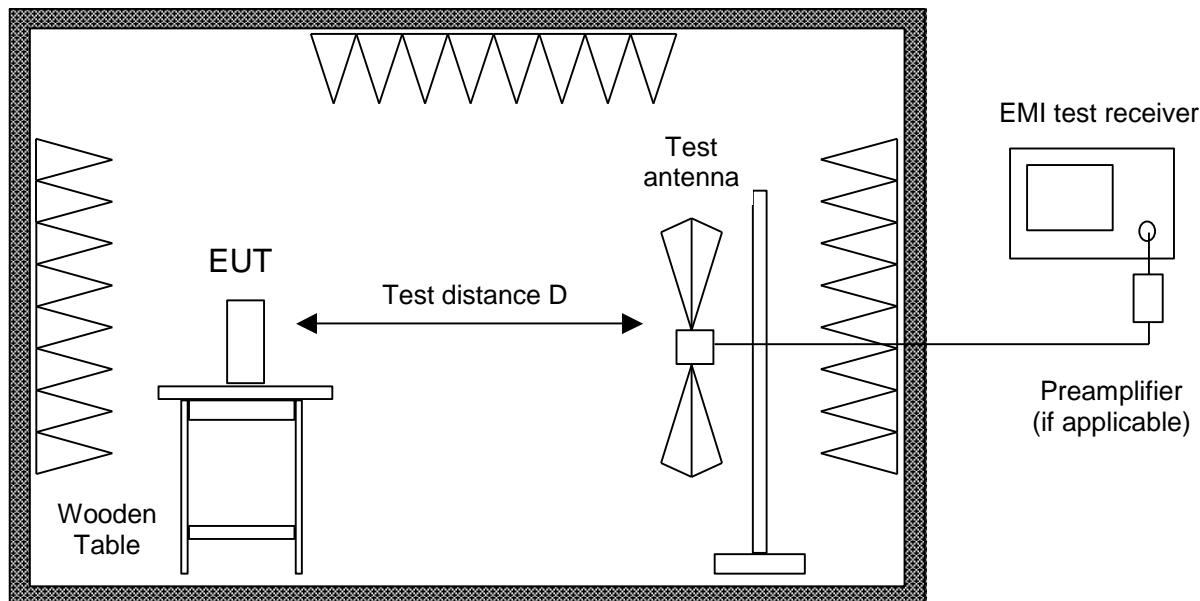
EUT is rotated all around to find the maximum levels of emissions. Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

If worst case emission of the EUT cannot be recorded with EUT in standard position and loop antenna in vertical polarization the EUT (or the radiating part of the EUT) is rotated by 90 degrees instead of changing the loop antenna to horizontal polarization. This procedure is selected to minimize the influence of the environment (e.g. effects caused by the floor especially with longer distances).

Final measurement is performed at a test distance D of 30 meters using an open field test site. In case the regulation requires testing at other distances, the result is extrapolated by either making measurements at an additional distance D of 10 meters to determine the proper extrapolation factor or by using the square of an inverse linear distance extrapolation factor (40 dB/decade). In cases of very low emissions measurements are performed at shorter distances and results are extrapolated to the required distance. The provisions of CFR 47 Part 15 sections 15.31(d) and (f)(2) apply. According to CFR 47 Part 15 section 15.209(d) final measurement is performed with detector function set to quasi-peak except for the frequency bands 9 to 90 kHz and 110 to 490 kHz where, for non-pulsed operation, average detector is employed.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Radiated Emission at Alternative Test Site



Alternate test site (semi anechoic room)

Radiated emission in the frequency range 30 MHz to 1 GHz is measured within a semi-anechoic room with groundplane complying with the NSA requirements of ANSI C63.4 for alternative test sites. A linear polarized logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna") is used. The measurement bandwidth of the test receiver is set to 120 kHz with quasi-peak detector selected.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Hand-held or body-worn devices are tested in the position producing the highest emission relative to the limit as verified by prescans in fully anechoic room.

If no prescan in a fully anechoic room is used first a peak scan is performed in four positions to get the whole spectrum of emission caused by EUT with the measuring antenna raised and lowered from 1 to 4 m to find table position, antenna height and antenna polarization for the maximum emission levels.

Data reduction is applied to these results to select those levels having less margin than 10 dB to or exceeding the limit using subranges and limited number of maximums. Further maximization is following.

With detector of the test receiver set to quasi-peak final measurements are performed immediately after frequency zoom (for drifting disturbances) and maximum adjustment.

Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

In cases where prescans in a fully anechoic room are taken (e. g. if EUT is operating for a short time only or battery is discharged quickly) final measurements with quasi-peak detector are performed manually at frequencies indicated by prescan with EUT rotating all around and receiving antenna raising and lowering within 1 meter to 4 meters to find the maximum levels of emission.

Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

For measuring emissions of intentional radiators and receivers a test distance D of 3 meters is selected. Testing of unintentional radiators is performed at a distance of 10 meters. If limits specified for 3 meters shall be used for measurements performed at 10 meters distance the limits are calculated according to CFR 47 Part 15 section 15.31(d) and (f)(1) using an inverse linear-distance extrapolation factor of 20 dB/decade.

6 Photographs Taken During Testing

See "Annex A to Test Report TR-06504-80561-09 | Issue: 01"

7 Referenced Regulations

| Publication | Title |
|----------------------------|---|
| CFR 47, Part 2 | Code of Federal Regulations Part 2 (Frequency allocation and radio treaty matters; General rules and regulations) of the Federal Communications Commission (FCC) |
| CFR 47, Part 15, Subpart C | Code of Federal Regulations Part 15 (Personal Radio Services), Subpart C (Intentional Radiators) of the Federal Communications Commission (FCC) |
| ANSI C63.4-2014 | American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz |
| ANSI C63.10-2013 | American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices |

8 Measurement Uncertainty Values

For a 95% confidence level, the measurement uncertainties for defined systems are:

| Radio Testing | | | |
|---|------|----------------------|------|
| Test Name | kp | Expanded Uncertainty | Note |
| Occupied Bandwidth | 2.0 | ±1.14 % | 2 |
| RF-Frequency error | 1.96 | ±1 · 10-7 | 7 |
| RF-Power, conducted carrier | 2 | ±0.079 dB | 2 |
| RF-Power uncertainty for given BER | 1.96 | +0.94 dB / -1.05 | 7 |
| RF power, conducted, spurious emissions | 1.96 | +1.4 dB / -1.6 dB | 7 |
| RF power, radiated | | | |
| 25 MHz – 4 GHz | 1.96 | +3.6 dB / -5.2 dB | 8 |
| 1 GHz – 18 GHz | 1.96 | +3.8 dB / -5.6 dB | 8 |
| 18 GHz – 26.5 GHz | 1.96 | +3.4 dB / -4.5 dB | 8 |
| 40 GHz – 170 GHz | 1.96 | +4.2 dB / -7.1 dB | 8 |
| Spectral Power Density, conducted | 2.0 | ±0.53 dB | 2 |
| Maximum frequency deviation | | | |
| 300 Hz – 6 kHz | 2 | ±2,89 % | 2 |
| 6 kHz – 25 kHz | 2 | ±0.2 dB | 2 |
| Maximum frequency deviation for FM | 2 | ±2,89 % | 2 |
| Adjacent channel power 25 MHz – 1 GHz | 2 | ±2.31 % | 2 |
| Temperature | 2 | ±0.39 K | 4 |
| (Relative) Humidity | 2 | ±2.28 % | 2 |
| DC- and low frequency AC voltage | | | |
| DC voltage | 2 | ±0.01 % | 2 |
| AC voltage up to 1 kHz | 2 | ±1.2 % | 2 |
| Time | 2 | ±0.6 % | 2 |

| Radio Interference Emission Testing | | | |
|---|----|----------------------|------|
| Test Name | kp | Expanded Uncertainty | Note |
| Conducted Voltage Emission | | | |
| 9 kHz to 150 kHz (50Ω/50µH AMN) | 2 | ± 3.8 dB | 1 |
| 150 kHz to 30 MHz (50Ω/50µH AMN) | 2 | ± 3.4 dB | 1 |
| 100 kHz to 200 MHz (50Ω/5µH AMN) | 2 | ± 3.6 dB | 1 |
| Discontinuous Conducted Emission | | | |
| 9 kHz to 150 kHz (50Ω/50µH AMN) | 2 | ± 3.8 dB | 1 |
| 150 kHz to 30 MHz (50Ω/50µH AMN) | 2 | ± 3.4 dB | 1 |
| Conducted Current Emission | | | |
| 9 kHz to 200 MHz | 2 | ± 3.5 dB | 1 |
| Magnetic Fieldstrength | | | |
| 9 kHz to 30 MHz (with loop antenna) | 2 | ± 3.9 dB | 1 |
| 9 kHz to 30 MHz (large-loop antenna 2 m) | 2 | ± 3.5 dB | 1 |
| Radiated Emission | | | |
| Test distance 1 m (ALSE) | | | |
| 9 kHz to 150 kHz | 2 | ± 4.6 dB | 1 |
| 150 kHz to 30 MHz | 2 | ± 4.1 dB | 1 |
| 30 MHz to 200 MHz | 2 | ± 5.2 dB | 1 |
| 200 MHz to 2 GHz | 2 | ± 4.4 dB | 1 |
| 2 GHz to 3 GHz | 2 | ± 4.6 dB | 1 |
| Test distance 3 m | | | |
| 30 MHz to 300 MHz | 2 | ± 4.9 dB | 1 |
| 300 MHz to 1 GHz | 2 | ± 5.0 dB | 1 |
| 1 GHz to 6 GHz | 2 | ± 4.6 dB | 1 |
| Test distance 10 m | | | |
| 30 MHz to 300 MHz | 2 | ± 4.9 dB | 1 |
| 300 MHz to 1 GHz | 2 | ± 4.9 dB | 1 |
| Radio Interference Power | | | |
| 30 MHz to 300 MHz | 2 | ± 3.5 dB | 1 |
| Harmonic Current Emissions | | | 4 |
| Voltage Changes, Voltage Fluctuations and Flicker | | | 4 |

| Immunity Testing | | | |
|--|------|----------------------|------|
| Test Name | kp | Expanded Uncertainty | Note |
| Electrostatic Discharges | | | 4 |
| Radiated RF-Field | | | |
| Pre-calibrated field level | 2 | +32.2 / -24.3 % | 5 |
| Dynamic feedback field level | 2.05 | +21.2 / -17.5 % | 3 |
| Electrical Fast Transients (EFT) / Bursts | | | 4 |
| Surges | | | 4 |
| Conducted Disturbances, induced by RF-Fields | | | |
| via CDN | 2 | +15.1 / -13.1 % | 6 |
| via EM clamp | 2 | +42.6 / -29.9 % | 6 |
| via current clamp | 2 | +43.9 / -30.5 % | 6 |
| Power Frequency Magnetic Field | 2 | +20.7 / -17.1 % | 2 |
| Pulse Magnetic Field | | | 4 |
| Voltage Dips, Short Interruptions and Voltage Variations | | | 4 |
| Oscillatory Waves | | | 4 |
| Conducted Low Frequency Disturbances | | | |
| Voltage setting | 2 | ± 0.9 % | 2 |
| Frequency setting | 2 | ± 0.1 % | 2 |
| Electrical Transient Transmission in Road Vehicles | | | 4 |

Note 1:

The expanded uncertainty reported according to CISPR 16-4-2:2003-11 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$

Note 2:

The expanded uncertainty reported according to UKAS Lab 34 (Edition 1, 2002-08) is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$

Note 3:

The expanded uncertainty reported according to UKAS Lab 34 (Edition 1, 2002-08) is based on a standard uncertainty multiplied by a coverage factor of $kp = 2.05$, providing a level of confidence of $p = 95.45\%$

Note 4:

It has been demonstrated that the used test equipment meets the specified requirements in the standard with at least a 95% confidence.

Note 5:

The expanded uncertainty reported according to IEC 61000-4-3 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$

Note 6:

The expanded uncertainty reported according to IEC 61000-4-6 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$

Note 7:

The expanded uncertainty reported according ETSI TR 100 028 V1.4.1 (all parts) to is based on a standard uncertainty multiplied by a coverage factor of $kp = 1.96$, providing a level of confidence of $p = 95.45\%$

Note 8:

The expanded uncertainty reported according to ETSI TR 102 273 V1.2.1 (all parts) is based on a standard uncertainty multiplied by a coverage factor of $kp = 1.96$, providing a level of confidence of $p = 95.45\%$

9 Test Equipment used

| T-ID | Designation | Type | Last Cal. | Next Cal. |
|-------|--------------------------------------|------------------|-----------|-----------|
| 18874 | Horn antenna | 3160-07 | Verified | |
| 18875 | Horn antenna | 3160-08 | Verified | |
| 19125 | Horn antenna | 3160-09 | Verified | |
| 19383 | Double ridged waveguide horn antenna | 3115 | 2020-03 | 2023-03 |
| 19442 | Horn antenna | 3160-10 | Verified | |
| 19533 | Spectrum analyser | FSP30 | 2020-09 | 2022-03 |
| 19933 | Double ridged horn antenna | HF907 | 2021-02 | 2020-23 |
| 19946 | Horn antenna | 24240-20 | Verified | |
| 20219 | Signal and Spectrum Analysator | FSV40 for TS8997 | 2020-01 | 2022-01 |
| 22553 | Waveguide mixer | FS-Z170 | 2020-02 | 2023-02 |
| 25849 | Waveguide mixer | FS-Z60 | 2020-02 | 2023-02 |
| 25850 | Waveguide mixer | FS-Z90 | 2020-02 | 2023-02 |
| 25851 | Waveguide mixer | FS-Z110 | 2020-02 | 2023-02 |
| 27898 | Horn antenna | 26240-20 | Verified | |
| 27899 | Horn antenna | 27240-20 | Verified | |
| 28268 | EMI test receiver | ESW26 | 2020-09 | 2021-09 |
| 39897 | EMI test receiver | ESW44 | 2020-03 | 2021-03 |
| 36954 | Harmonic Mixer | FS-Z220 | 2020-02 | 2023-02 |
| 36955 | Harmonic Mixer | FS-Z325 | 2020-02 | 2023-02 |
| 37863 | Horn antenna | 30240-20 WG30 | Verified | |
| 37864 | Horn antenna | 32240-20 WG32 | Verified | |
| 38401 | ULTRALOG Antenna | HL562E | 2018-05 | 2021-05 |

Test software for: EMC32 V10.

10 Test Results

| CFR 47, Part 2 | | | |
|--------------------------|-----------------------|-------------|--------------------|
| <i>Section(s)</i> | <i>Test performed</i> | <i>Page</i> | <i>Test Result</i> |
| § 2.202 (a); § 2.1049 | Occupied Bandwidth | 23 | Test passed |

| CFR 47, Part 15, Subpart C, | | | |
|------------------------------------|--------------------------|-------------|--------------------|
| <i>Section(s)</i> | <i>Test performed</i> | <i>Page</i> | <i>Test Result</i> |
| § 15.255 (b) | Radiated Power – Average | 19 | Test passed |
| § 15.255 (e) | Radiated Power – Peak | 19 | Test passed |
| § 15.255 (d) | Spurious Emissions | 25 | Test passed |
| § 15.255 (f) | Frequency Stability | 37 | Test passed |
| --- | Duty Cycle | 40 | Test passed |

10.1 Radiated Power

| | | |
|--------------|----------------------------------|--|
| Date of Test | 2020-05-07 | Test Result |
| Operator | Alex Fink | <input checked="" type="checkbox"/> Passed |
| Test Site | Semi anechoic room, cabin no. 11 | <input type="checkbox"/> Not Passed |

| | |
|----------------------|---------|
| Barometric pressure: | 976 hPa |
| Relative humidity: | 51 % |
| Ambient temperature: | 26 °C |

| | |
|------------------------------|---|
| Specifications: | Part 15, Subpart C, §15.255 (c)(2) and §15.255 (e) FCC waiver, FCC DA 18-1308 |
| Description: | Per paragraph 14 of the associated waiver, FCC DA 18-1308, The radar shall be certified for compliance with all the technical specifications applicable to operation under 47 CFR Part 15, with the exception of the following provisions in 47 CFR §§ 15.255(a)(2) and (c)(3), which are waived to allow the device to operate as a radar on new passenger motor vehicles in the 57-64 GHz band at a maximum +13 dBm EIRP, +10 dBm transmitter conducted output power, and +13 dBm/MHz power spectral density. |
| Operation mode: Comment : | Transmitting continuously Test was performed as radiated test. The test distance was 1.0 m. A correction factor of -50 dB and mixer conversion loss table were used to account for the test antenna gain, free-space loss and external mixer loss. Reading value of figures is thereby dBm not dB μ V. |

| Detector | EIRP | Limit | Note |
|----------|-----------------|-------------|------|
| RMS | 7.15 dBm | 13 dBm | -- |
| RMS | -29.99 dBm/1MHz | 13 dBm/1MHz | #1 |
| Peak | 8.96 dBm/80MHz | 13 dBm/1MHz | |

Note(s):

- #1 See figure 2.
- #2 Peak PSD measurement was performed with a RBW of 80 MHz.
A conversion formula can be applied to calculated test result.
Calculated test result is $-29.10 \text{ dBm/MHz} = 8.96 \text{ dBm/80MHz} - 20\log(80\text{MHz}/1\text{MHz})$

| Detector | Conducted Output Power | Limit | Note |
|----------|------------------------|--------|------|
| Peak | 2.56 dBm (1.80 mW) | 10 dBm | #1 |

Note(s):

#1 Antenna gain of 6.4 dBi subtracted from EIRP result of 8.96 dBm.

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Product Service

Plots taken during test

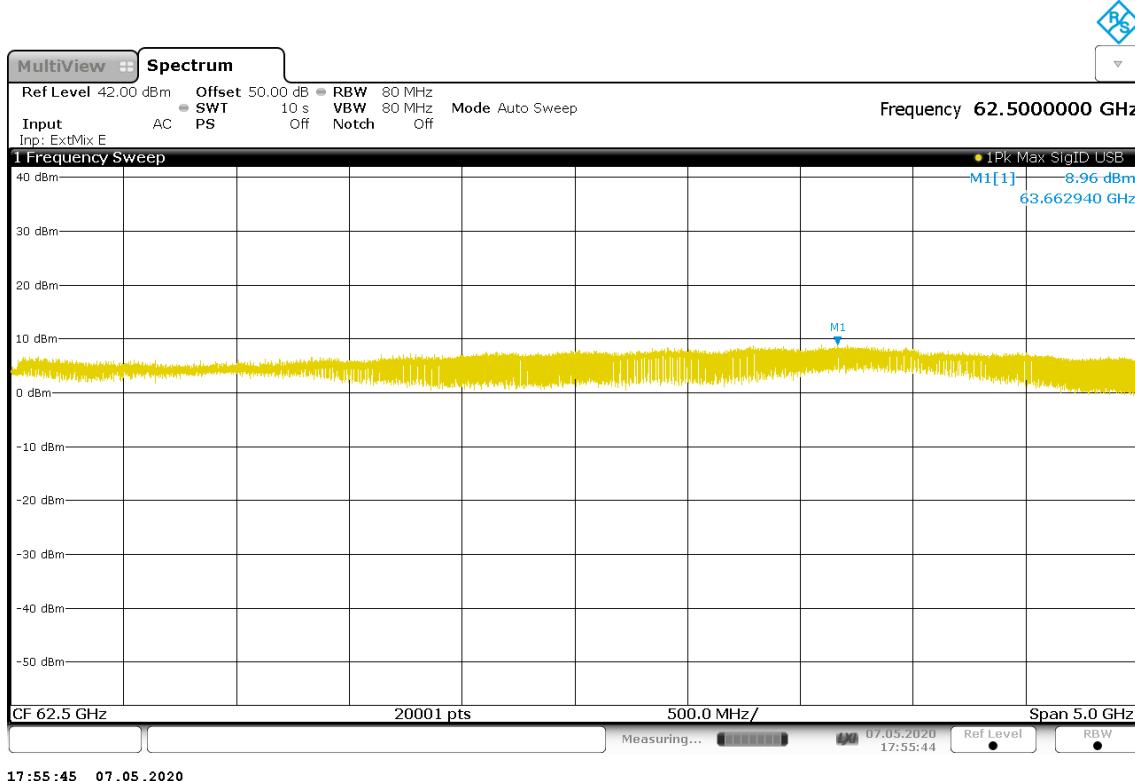


Figure 1 - Peak

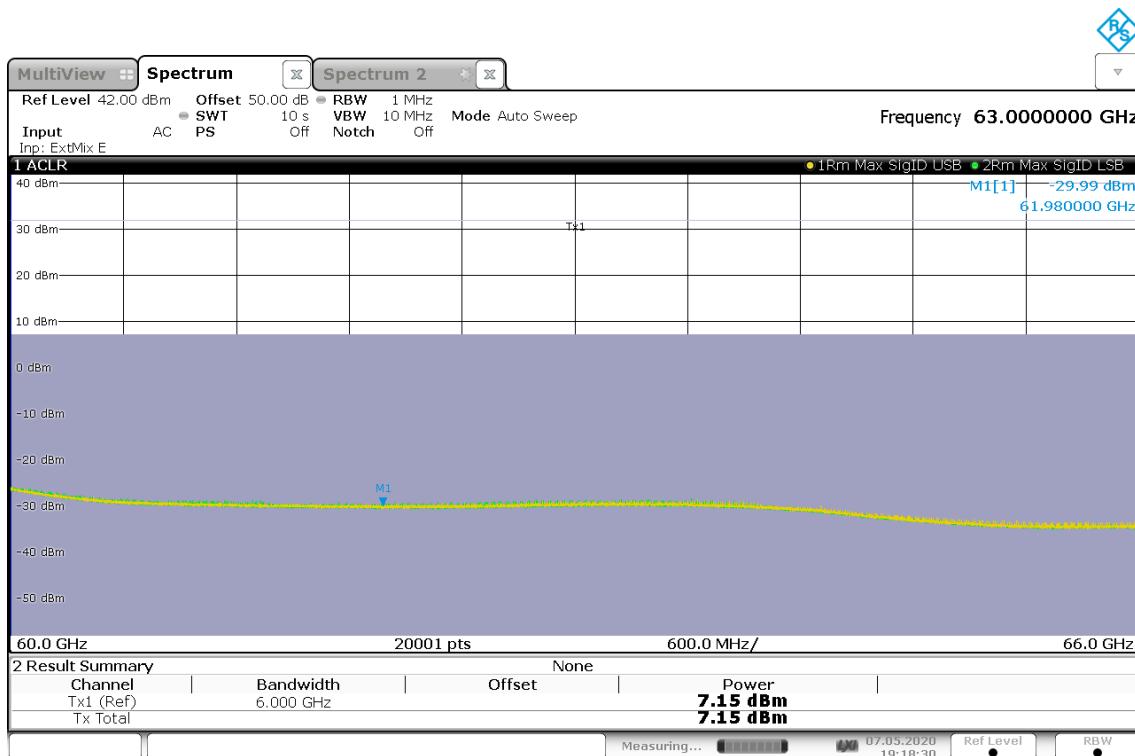


Figure 2 - Average

10.2 Occupied Bandwidth

| | | |
|--------------|-------------------|--|
| Date of Test | 2020-05-08 | Test Result |
| Operator | Alex Fink | <input checked="" type="checkbox"/> Passed |
| Test Site | Non shielded room | <input type="checkbox"/> Not Passed |

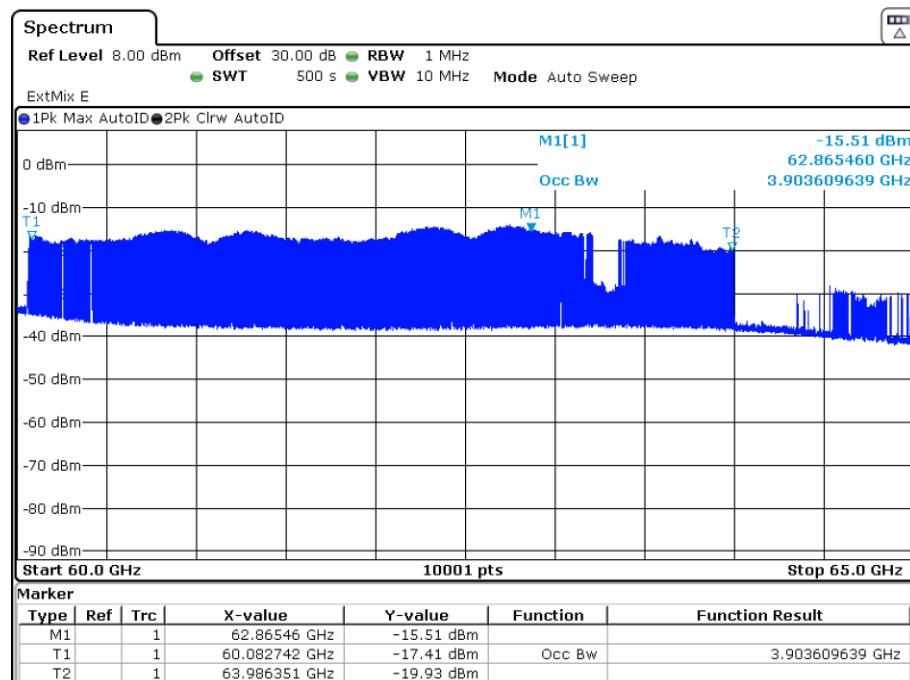
| | |
|----------------------|---------|
| Barometric pressure: | 985 hPa |
| Relative humidity: | 30 % |
| Ambient temperature: | 20 °C |

| | |
|-----------------|---|
| Specifications: | CFR 47, Part 2, Clause 2.1049 and 2.202(a) |
| Description: | The occupied bandwidth, that is the frequency bandwidth such that, below its lower and above its upper frequency limits, the mean powers radiated are each equal to 0.5 percent of the total mean power radiated by a given emission shall be measured. |
| Operation mode: | Transmitting continuously |
| Comment : | VitaSense device may operate using an occupied bandwidth of 4 GHz within the 60-64 GHz frequency band, in lieu of the occupied bandwidth requirement of 500 MHz or less specified in section B (2) due to an FCC waiver. |

| Temperature | Voltage | Frequency Low f_L (GHz) | Frequency High f_H (GHz) | Occupied Bandwidth (GHz) |
|-------------|-----------|---------------------------|----------------------------|--------------------------|
| +20.0 °C | 12.0 V DC | 60.08274 | 63.98635 | 3.90361 |

See attached test plots.

Plots taken during test



Date: 8.MAY.2020 21:50:32

10.3 Spurious Radiated Emissions

| | | |
|--------------|--|--|
| Date of Test | 2020-04-06 to 2020-05-07 | Test Result |
| Operator | Alex Fink | <input checked="" type="checkbox"/> Passed |
| Test Site | Semi anechoic room, cabin no. 11 Fully anechoic room, cabin no. 2 | <input type="checkbox"/> Not Passed |

| | |
|----------------------|---------|
| Barometric pressure: | 976 hPa |
| Relative humidity: | 51 % |
| Ambient temperature: | 26 °C |

| | |
|------------------------------|--|
| Specifications: | CFR 47, Part 15, Subpart C, § 15.255 (d) |
| Description: | <p>(1) The power density of any emissions outside the 57-71 GHz band shall consist solely of spurious emissions.</p> <p>(2) Radiated emissions below 40 GHz shall not exceed the general limits in §15.209.</p> <p>(3) Between 40 GHz and 200 GHz, the level of these emissions shall not exceed 90 pW/cm² at a distance of 3 meters.</p> <p>(4) The levels of the spurious emissions shall not exceed the level of the fundamental emission.</p> |
| Operation mode: Comment : | <p>Transmitting continuously</p> <p>This test was performed as radiated test in the frequency range 30 MHz to 300 GHz. No significant spurious emissions were observed. The test distance was 3 m in the frequency ranges 9 kHz to 12 GHz and 18 GHz to 40 GHz, 1 m in the frequency ranges 12 GHz to 18 GHz and 40 GHz to 200 GHz.</p> <p>The measurement below was done using EMC 32 V10.40.00 automated software.</p> <p>See plots for details.</p> |

Sample calculation of field final values:

$$\text{Final Value (dB}\mu\text{V/m)} = \text{Reading Value (dB}\mu\text{V)} + (\text{Antenna Correction Factor (dB/m)} + \text{Cable Correction Factor (dB)})$$

| Radiated emission limits 9 kHz – 40 GHz | | |
|---|-----------------------------|--------------------------|
| Frequency (MHz) | Field strength (μ V/m) | Measurement distance (m) |
| 0.009 – 0.490 | 2400/f(kHz) | 300 |
| 0.490 – 1.705 | 24000/f(kHz) | 30 |
| 1.705 – 30 | 30 | 30 |
| 30 – 88 | 100 | 3 |
| 88 – 216 | 150 | 3 |
| 216 – 960 | 200 | 3 |
| 960 – 40000 | 500 | 3 |

Note(s):

- 1 In the emissions table the tighter limit applies at the band edges.
- 2 The limits are based on the frequency of the unwanted emissions and not the fundamental frequency. However, the level of any unwanted emission shall not exceed the level of the fundamental frequency.
- 3 The emissions limits shown in the table are based on measurement employing CISPR quasi-peak detector except for the frequency bands 9.0 – 90 kHz, 110.0 – 490 kHz, and above 1 GHz. Radiated emissions limits in these three bands are based on measurements employing an average detector with 1 MHz RBW.

Table 1: Radiated emission limits 9 kHz – 40 GHz

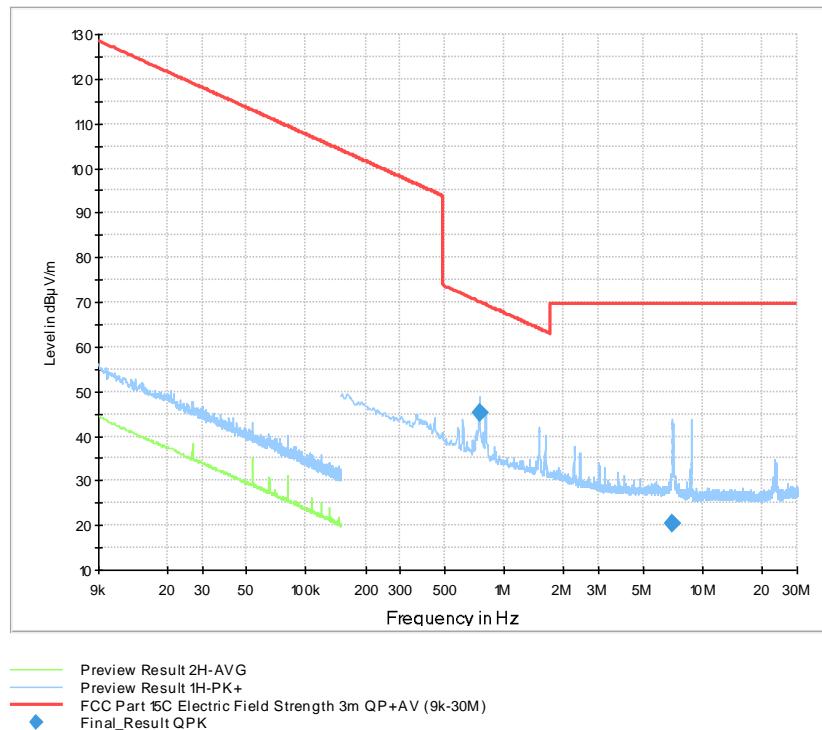
| Radiated emission limits 40 GHz – 200 GHz | | |
|---|---|--------------------------|
| Frequency (GHz) | Power Density (μ W/cm ²) | Measurement distance (m) |
| 40 – 200 | 90 | 3 |

Note(s):

- 1 According to 47 CFR, Part 15, § 15.255(d)(3): Between 40 GHz and 200 GHz, the level of these emissions shall not exceed 90 μ W/cm² at a distance of 3 meters.
- 2 The power density of 90 μ W/cm² corresponds to a field strength of 85.31 dB μ V/m for 3 m distance, 94.85 dB μ V/m for 1 m distance.

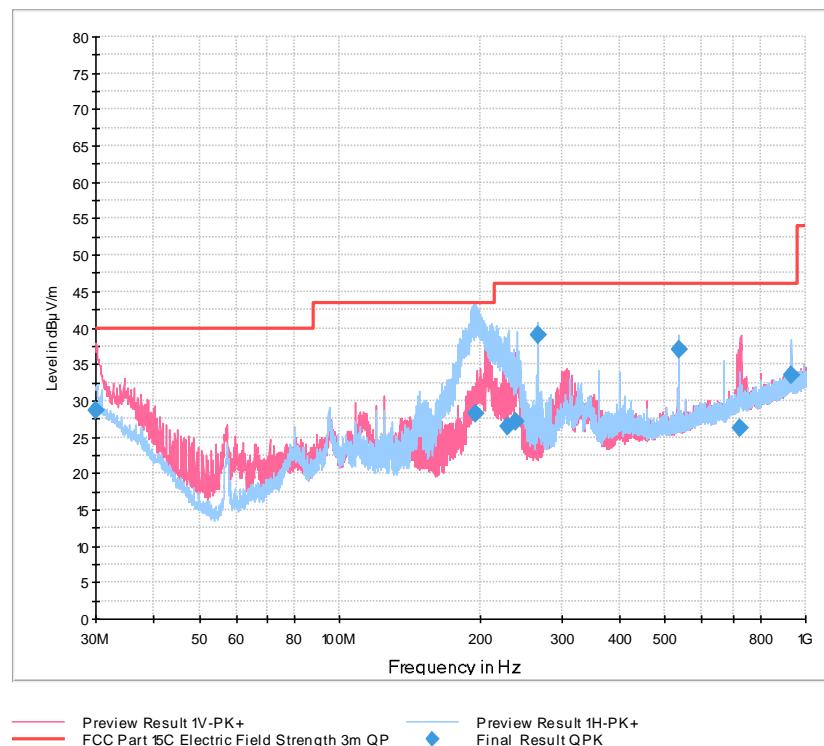
Table 2: Radiated emission limits above 40 GHz

Plots taken during measurement



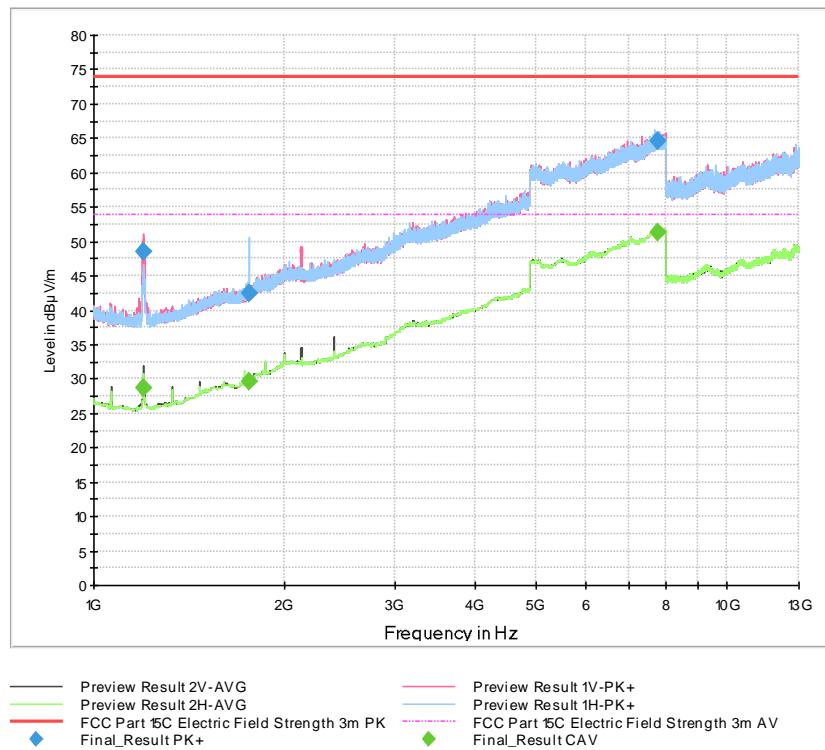
Final Results:

| Frequency MHz | QuasiPeak dB μ V/m | CAverage dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|---------------------------|--------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 0.748500 | 45.32 | --- | 70.12 | 24.80 | 1000.0 | 9.000 | 100.0 | H | -49.0 | 19.1 |
| 7.041750 | 20.57 | --- | 69.54 | 48.97 | 1000.0 | 9.000 | 100.0 | H | 240.0 | 19.1 |

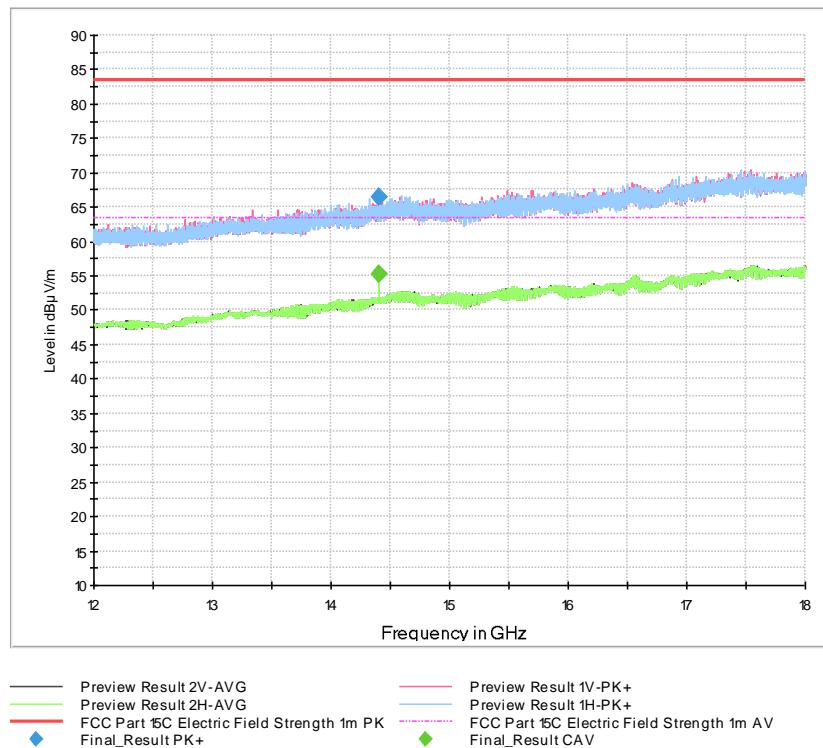


Final Results:

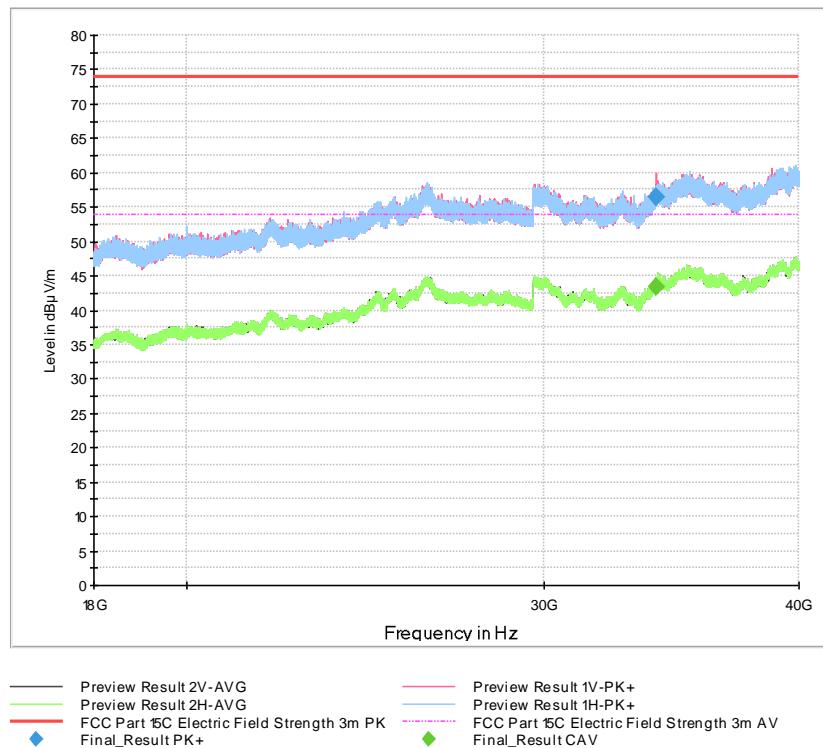
| Frequency MHz | QuasiPeak dBμV/m | Limit dBμV/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|---------------------|-----------------|--------------|------------------|------------------|--------------|-----|----------------|---------------|
| 30.090000 | 28.60 | 40.00 | 11.40 | 1000.0 | 120.000 | 128.0 | V | 231.0 | 25.8 |
| 195.990000 | 28.26 | 43.50 | 15.24 | 1000.0 | 120.000 | 111.0 | H | -78.0 | 16.0 |
| 229.740000 | 26.35 | 46.02 | 19.67 | 1000.0 | 120.000 | 134.0 | H | -75.0 | 17.3 |
| 238.890000 | 27.17 | 46.02 | 18.85 | 1000.0 | 120.000 | 121.0 | H | -21.0 | 17.6 |
| 266.670000 | 38.98 | 46.02 | 7.04 | 1000.0 | 120.000 | 143.0 | H | -14.0 | 18.1 |
| 533.310000 | 37.04 | 46.02 | 8.98 | 1000.0 | 120.000 | 144.0 | H | 2.0 | 24.0 |
| 725.670000 | 26.15 | 46.02 | 19.87 | 1000.0 | 120.000 | 198.0 | V | -17.0 | 27.1 |
| 933.450000 | 33.59 | 46.02 | 12.43 | 1000.0 | 120.000 | 119.0 | H | 0.0 | 29.1 |



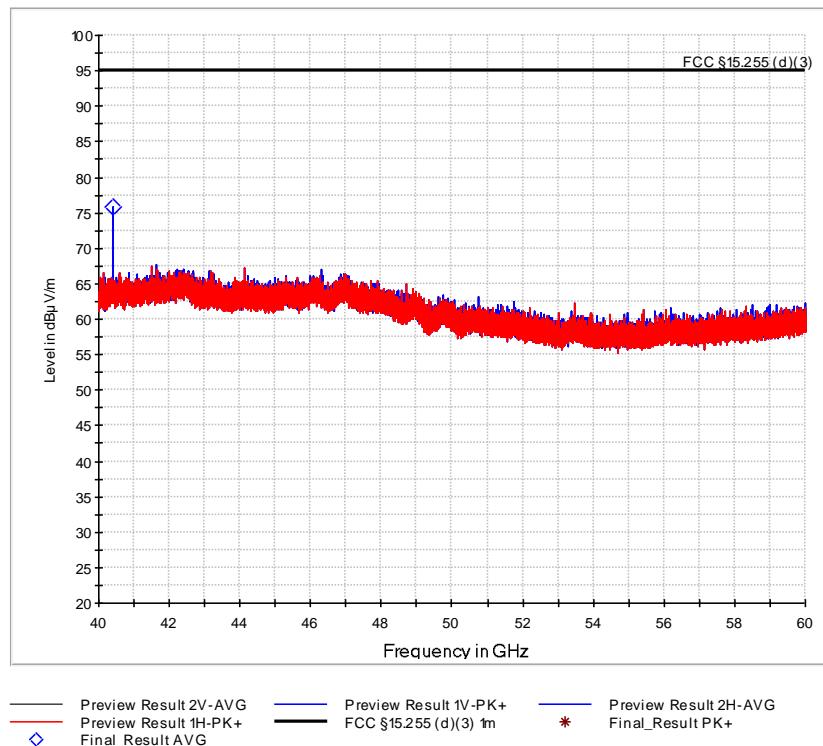
| Frequency MHz | MaxPeak dBμV/m | CAverage dBμV/m | Limit dBμV/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------|--------------------|-----------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 1200.500000 | 48.40 | --- | 73.98 | 25.58 | 1000.0 | 1000.000 | 321.0 | V | 68.0 | 26.7 |
| 1200.500000 | --- | 28.59 | 53.98 | 25.39 | 1000.0 | 1000.000 | 321.0 | V | 68.0 | 26.7 |
| 1761.000000 | 42.38 | --- | 73.98 | 31.60 | 1000.0 | 1000.000 | 115.0 | H | 29.0 | 29.7 |
| 1761.000000 | --- | 29.58 | 53.98 | 24.40 | 1000.0 | 1000.000 | 115.0 | H | 29.0 | 29.7 |
| 7790.750000 | --- | 51.37 | 53.98 | 2.61 | 1000.0 | 1000.000 | 400.0 | V | 203.0 | 43.4 |
| 7790.750000 | 64.70 | --- | 73.98 | 9.28 | 1000.0 | 1000.000 | 400.0 | V | 203.0 | 43.4 |



| Frequency MHz | MaxPeak dB μ V/m | CAverage dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|--------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 14399.500000 | --- | 55.14 | 63.50 | 8.36 | 1000.0 | 1000.000 | 165.0 | H | 69.0 | 50.2 |
| 14399.500000 | 66.51 | --- | 83.50 | 16.99 | 1000.0 | 1000.000 | 165.0 | H | 69.0 | 50.2 |

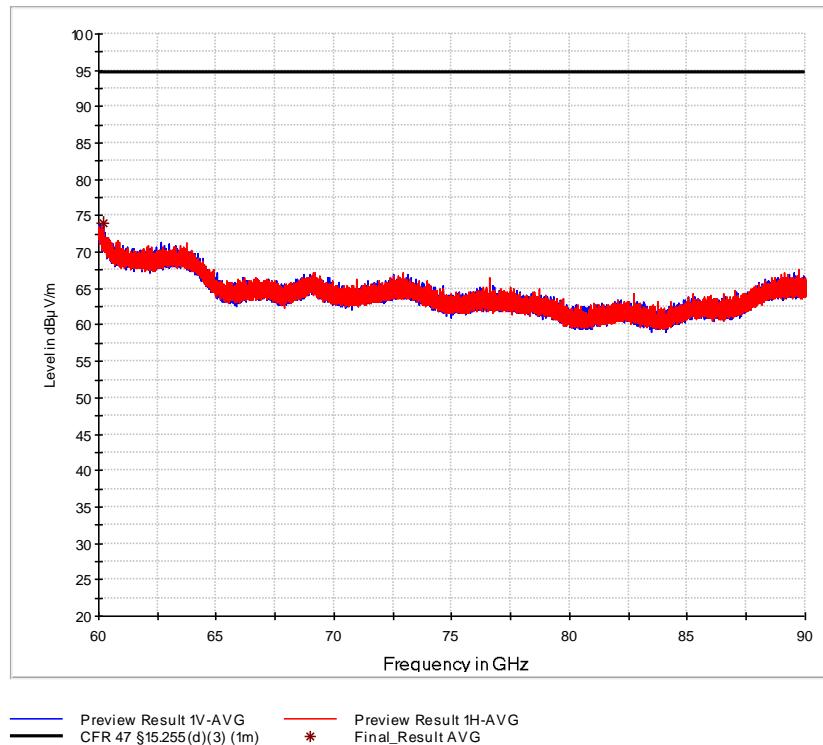


| Frequency MHz | MaxPeak dB μ V/m | CAverage dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|--------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 34048.500000 | --- | 43.37 | 53.98 | 10.61 | 1000.0 | 1000.000 | 159.0 | V | -27.0 | 24.4 |
| 34048.500000 | 56.55 | --- | 73.98 | 17.43 | 1000.0 | 1000.000 | 159.0 | V | -27.0 | 24.4 |



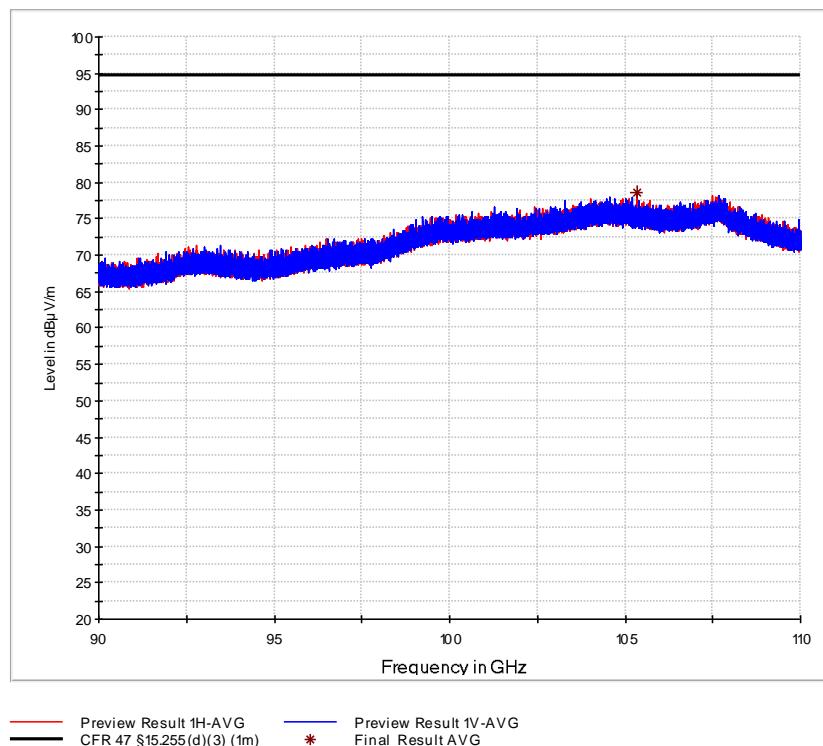
Final Results:

| Frequency MHz | MaxPeak dB μ V/m | Average dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|-------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 40413.125000 | --- | 75.72 | 63.50 | -12.22 | 5.0 | 1000.000 | 150.0 | V | 70.0 | 44 |



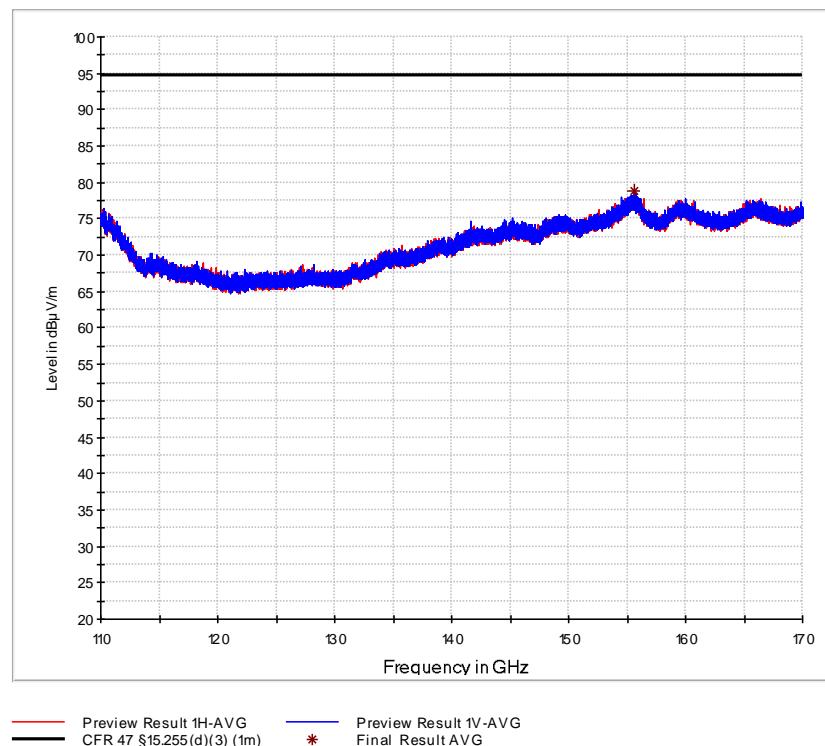
Final Results:

| Frequency MHz | Average dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|-----------------------|--------------|------------------|------------------|--------------|-----|----------------|---------------|
| 60179.062500 | 73.96 | 94.65 | 20.69 | 2.5 | 1000.000 | 150.0 | H | 25.0 | 48 |



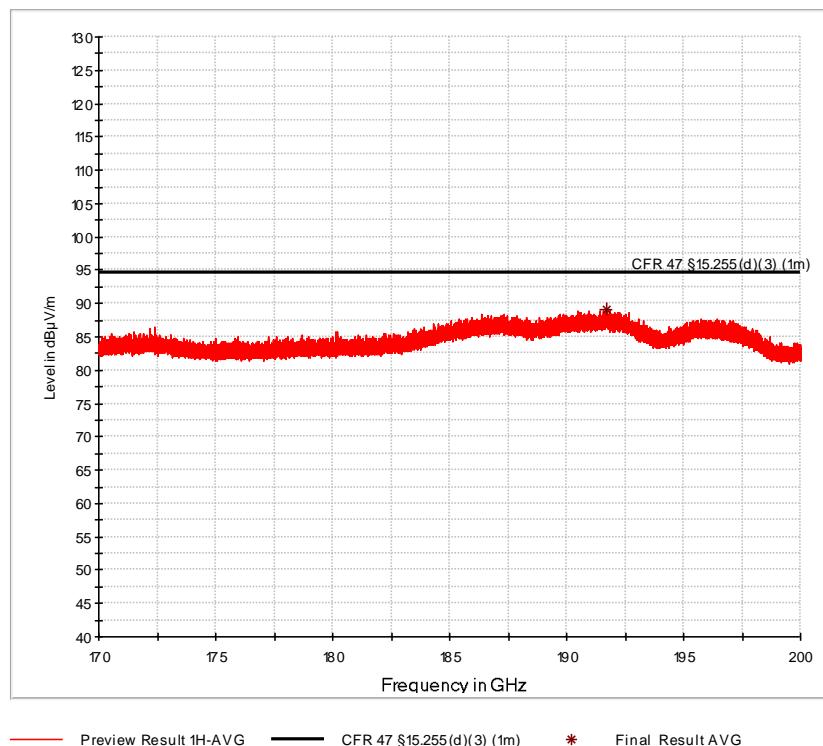
Final Results:

| Frequency MHz | Average dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 105324.375000 | 78.56 | 94.65 | 16.09 | 2.5 | 1000.000 | 150.0 | H | 89.0 | 50 |



Final Results:

| Frequency MHz | Average dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 155616.875000 | 78.78 | 94.65 | 15.87 | 2.5 | 1000.000 | 150.0 | V | 4.0 | 50 |



Final Results:

| Frequency MHz | Average dB μ V/m | Limit dB μ V/m | Margin dB | Meas. Time ms | Bandwidth kHz | Height cm | Pol | Azimuth deg | Corr. dB/m |
|------------------|-------------------------|-----------------------|--------------|---------------------|------------------|--------------|-----|----------------|---------------|
| 191727.500000 | 89.14 | 94.65 | 5.51 | 2.5 | 1000.000 | 150.0 | H | 228.0 | 55 |

10.4 Frequency Stability

| | | |
|--------------|-------------------|--|
| Date of Test | 2020-05-08 | Prüfergebnis / Test Result |
| Operator | Alex Fink | <input checked="" type="checkbox"/> Erfüllt / Passed |
| Test Site | Non shielded room | <input type="checkbox"/> Nicht erfüllt / Not passed |

| | |
|----------------------|---------|
| Barometric pressure: | 985 hPa |
| Relative humidity: | 30 % |
| Ambient temperature: | 20 °C |

| | |
|-----------------|---|
| Specifications: | CFR 47, Part 15, Subpart C, §15.255(f) |
| Description: | Fundamental emissions must be contained within the frequency bands specified in this section during all conditions of operation. Equipment is presumed to operate over the temperature range -20 °C to 50 °C with a input voltage variation of 85 % to 115 % of rated input voltage unless justification is presented to demonstrate otherwise. |
| Operation mode: | Transmitting continuously |
| Comment : | See plots of tests for details. |

| Temperature | Voltage | Frequency Low f_L (GHz) | Frequency High f_H (GHz) |
|-------------|-----------|---------------------------|----------------------------|
| +20.0 °C | 10.2 V DC | 60.08074 | 63.98885 |
| +20.0 °C | 12.0 V DC | 60.08274 | 63.98635 |
| +20.0 °C | 13.8 V DC | 60.08374 | 63.98435 |
| -20.0 °C | 12.0 V DC | 60.15312 | 63.98928 |
| -10.0 °C | 12.0 V DC | 60.12547 | 64.00047 |
| 0.0 °C | 12.0 V DC | 60.07682 | 64.00047 |
| +10.0 °C | 12.0 V DC | 60.07402 | 64.00047 |
| +30.0 °C | 12.0 V DC | 60.05512 | 64.00047 |
| +40.0 °C | 12.0 V DC | 60.05337 | 64.00047 |
| +50.0 °C | 12.0 V DC | 60.07402 | 64.00047 |

All emissions are within the 57 – 71 GHz frequency band.
 See plots for details

Sample Test plots taken during test

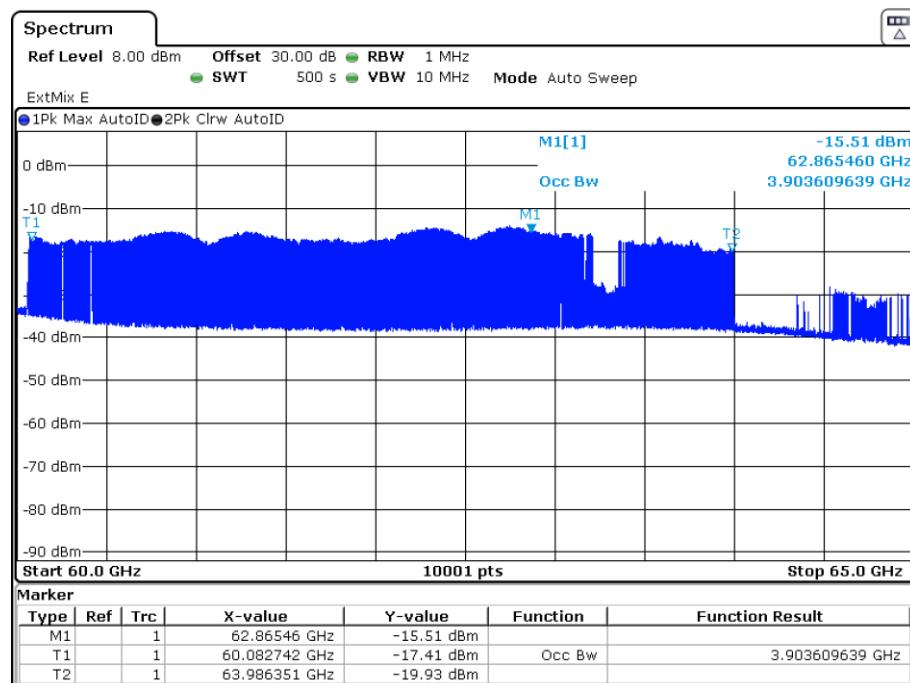


Figure 3 – 20°C and 12 V DC

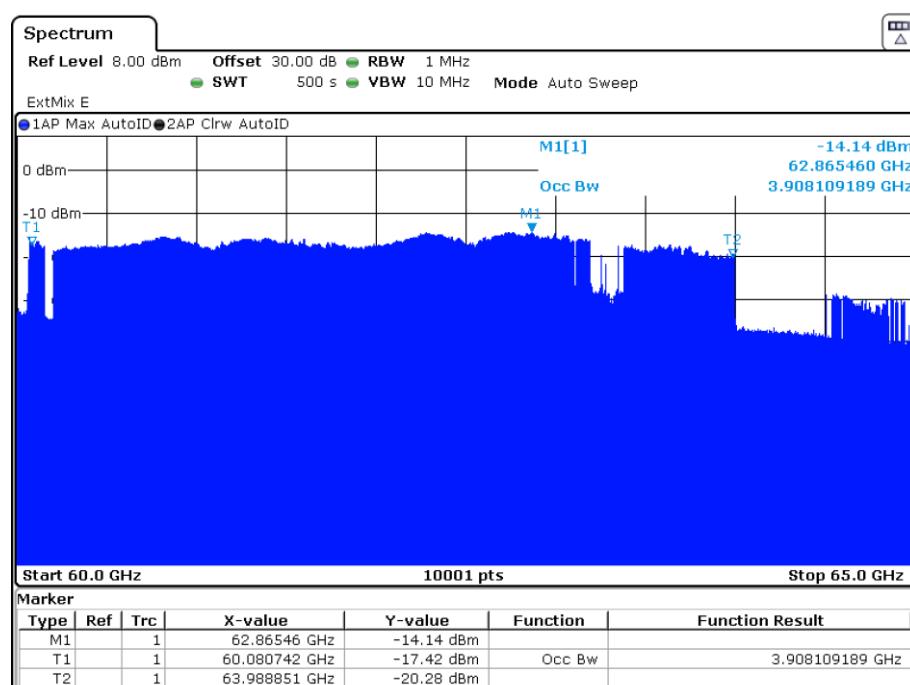
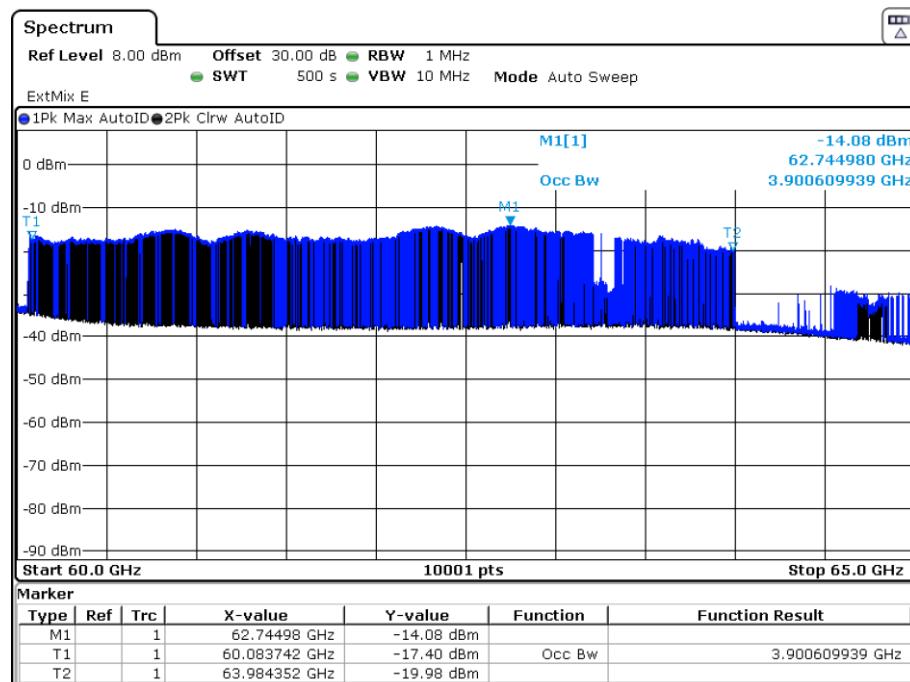


Figure 4 – 20°C and 10.2 V DC



Date: 8.MAY.2020 22:05:35

Figure 5 – 20°C and 13.8 V DC

10.5 Duty Cycle

| | | |
|--------------|-------------------|--|
| Date of Test | 2021-03-29 | Prüfergebnis / Test Result |
| Operator | Alex Fink | <input checked="" type="checkbox"/> Erfüllt / Passed |
| Test Site | Non shielded room | <input type="checkbox"/> Nicht erfüllt / Not passed |

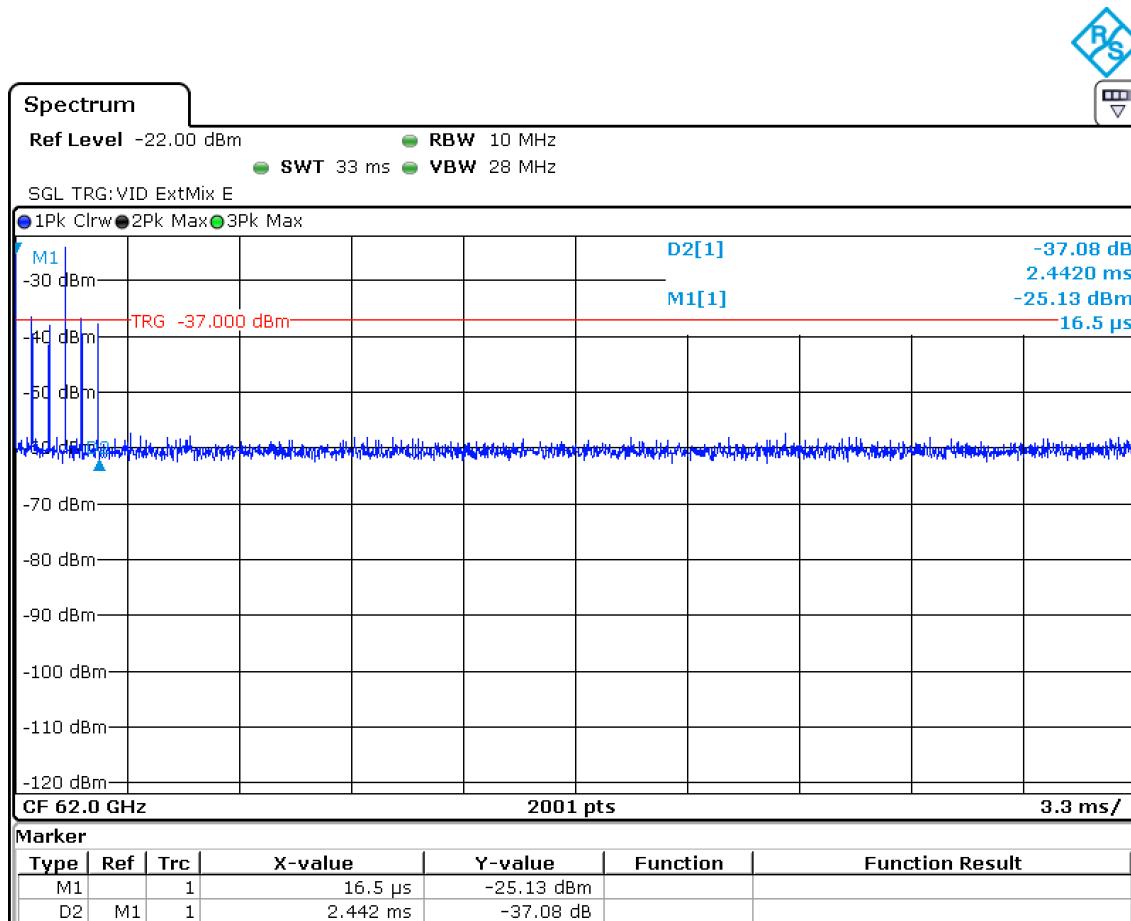
| | |
|----------------------|---------|
| Barometric pressure: | 993 hPa |
| Relative humidity: | 30 % |
| Ambient temperature: | 20 °C |

| | |
|-----------------|---|
| Specifications: | Authorization document DA 21-407; 53. Waiver Conditions |
| Description: | The transmit duty cycle shall not exceed 10% in any 33ms. |
| Operation mode: | Normal operation mode |
| Comment : | --- |

| Result | Duty Cycle | Limit | Note |
|----------|--|-------|------|
| Pass | $\left(\frac{2.442 \text{ ms}}{33.000 \text{ ms}} \right) = 7.4 \%$ | 10 % | NA |
| Note(s): | | | --- |

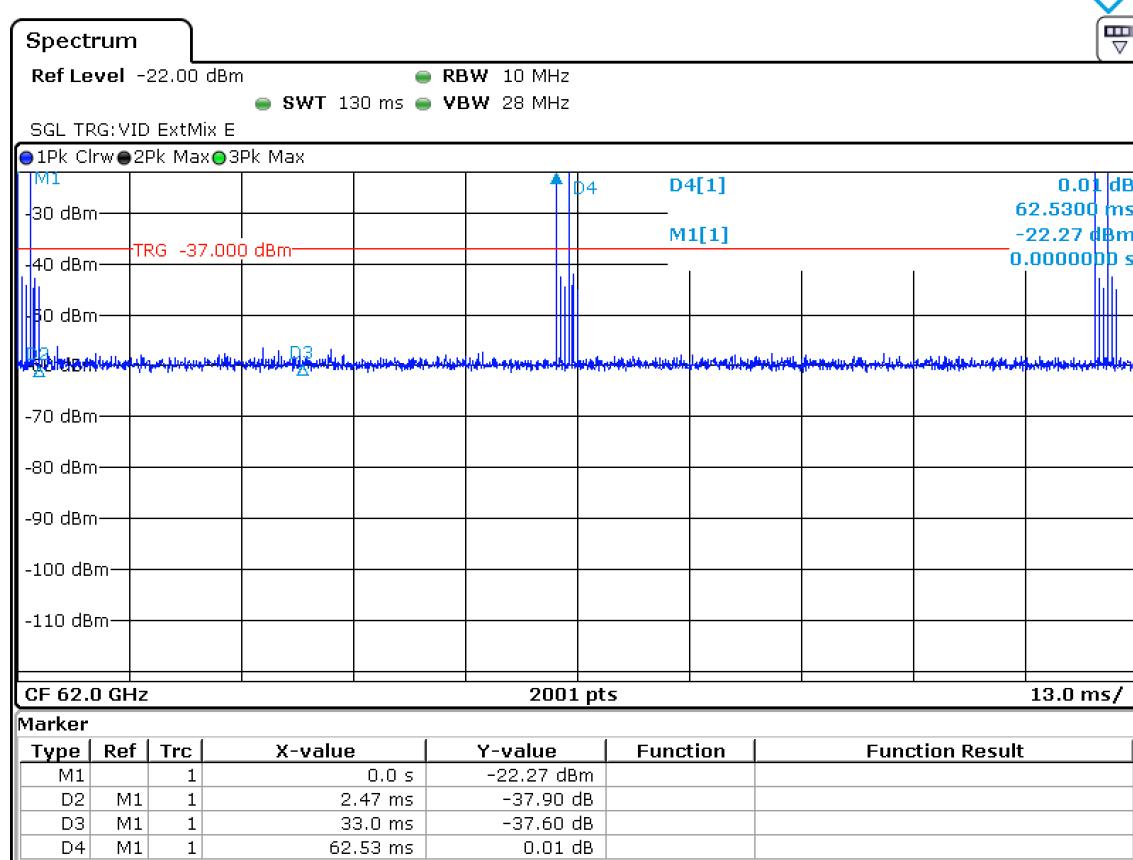
See plots on next page.

Sample Test plots taken during test



Date: 29.MAR.2021 11:27:32

Figure 6 – 33 ms time frame



Date: 29.MAR.2021 11:29:49

Figure 7 – 130 ms time frame

11 Revision History

| Revision History | | | |
|-------------------------|-------------|------------------|-------------------------------------|
| <i>Edition</i> | <i>Date</i> | <i>Issued by</i> | <i>Modifications</i> |
| 1 | 2021-04-15 | Alex Fink | First Edition |
| 2 | 2021-04-19 | Alex Fink | Section 10.1, test results updated. |