GENTEX CORPORATION

A Smarter Vision®

Technical Report to the FCC and ISED Regarding Gentex Corporation – Integrated Toll Module

Model: UAGTMB
FCC ID: NZLUAGTMB
ISED: 4112A-UAGTMB

Emission Designator: 5M38L1D
7/11/19

A report concerning approval for Gentex Corporation model UAGTMB
Please issue grant immediately upon review.

Measurements Made by:

Bolay Pannell Digitally signed by Bolay Pannell Date: 2019.07.11 08:29:19 -04'00'

Bolay Pannell
Senior EMC Test Engineer
Gentex Corporation

Measurements Reviewed by:

Daniel Brasier Digitally signed by Daniel Brasier Date: 2019.07.11 08:57:07 -04'00'

Dan Brasier
Senior EMC Test Engineer
Gentex Corporation

Report and Application Prepared by:

Brian Miller Digitally signed by Brian Miller Date: 2019.07.11 08:10:37 -04'00'

Brian Miller
Regulatory Compliance Engineer
Gentex Corporation

Report Approved and Submitted by:

Craig Harder, NCT, Lab Manager - Electromagnetic Compatibility Digitally signed by Craig Harder, NCT, Lab Manager - Electromagnetic Compatibility Date: 2019.07.11 08:33:25 -04'00'

Craig Harder
Lab Manager - EMC Lab
Gentex Corporation

Test Report Revision

REV Number	Date	Author	Description
1.0	6/13/19	Brian Miller	Initial Release.
2.0	6/13/19	Brian Miller	Updated OBW values and screenshots.
3.0	6/24/19	Brian Miller	Updated per Notified Body feedback.
4.0	7/9/19	Brian Miller	Additional testing performed per feedback.
5.0	7/11/19	Brian Miller	Updated Harmonics section with formula and minimum attenuation based off of maximum output power.

Results relate only to the items tested as received.

Compliance has been evaluated based on the Lab Manual section 7.6.2. The decision rule used regarding measurement uncertainty was to determine results solely on whether the measured values met the defined acceptance criteria without factoring in measurement uncertainty values.

1. General Information

1.1. Product Description

The Gentex Corporation Integrated Toll Module is a Radio-Frequency Identification (RFID) transponder OEM device that is installed into an overhead area of the automobile. The installation is provided by trained technicians during the course of the manufacture of the automobile. It is powered by the 12 Volt system of the automobile.

The unit is designed for the periodic operation as a toll module.

The unit is supplied to the automobile manufacturer without harness. For testing purposes a typical assembly and 2-conductor cable harness were used to power to the unit.

The unit is only operational when interrogated by a reader operating in the same protocol.

The antenna system is an integral part of the unit. It cannot be altered nor replaced by the user. Service of this system is only available from the Automobile Manufacturer's Dealerships and Gentex Corporation.

1.2. Related Grants

This device will have functionality that is covered under 47 CFR Part 90 and ISED Canada RSS-137. The device will have FCC ID # of NZLUAGTMB and ISED ID # of 4112A-UAGTMB.

1.3. Test Methodology

Radiated Emissions testing was performed according to ANSI C63.26:2015. The power source for this product is a 12V automotive vehicle battery, thus conducted emissions measurements are not required.

The unit is supplied to the automobile manufacturer without harness. For testing purposes a 2-conductor cable harness was used to interface to the unit.

1.4. Test Facility

The 3-meter semi-anechoic chamber where these measurements were taken is located on the grounds of Gentex Corporation's Corporate Labs, in the city of Zeeland, county of Ottawa, state of Michigan, United States of America.

For radiated measurements above 1 GHz, RF absorbing material is placed between the antenna and EUT in accordance with ANSI C63.4:2014 Section 5.5 and chamber manufacturer's instructions.

Tabletop testing was conducted on a 3m turntable described in the site recertification report. The 3m chamber has been added to our A2LA scope of accreditation on 4/18/2019 and includes accreditation to ANSI C63.4:2014, ANSI C63.10:2013, and C63.26:2015. Our 3m chamber is registered with the ISED under Site# 4112A-2 and FCC under registration number 357351.

Corporate Mailing/Shipping Address
Gentex Corporation
600 N. Centennial Street
Zeeland, MI 49464

Site Address
Gentex Corporation
380 Riley Street
Zeeland, MI 49464

1.5. Accreditation

The Gentex Corporate EMC Lab is accredited to ISO/IEC 17025 by the American Association for Laboratory Accreditation (A2LA). Our laboratory scope and accreditation certificate #2529.01 are available from their web site www.a2la.org. Our scope of accreditation covers ANSI C63.4:2014, ANSI C63.10:2013, ANSI C63.26:2015 and Radiated Emissions at 3m, FCC 47 CFR Part 90, ISED RSS-137.

2. Product Labeling

2.1. Identifiers

The FCC Identifier assigned is FCC ID: NZLUAGTMB. The ISED certification number is 4112A-UAGTMB. These identifiers will be labeled on the product housing.

The label will be printed on a label, which will be placed on the exterior of the housing and permanently affixed.

Because of the small size of the device and because the installation is inside a portion of the automobile, the following statements will appear in the user's manual. Refer to attachment "Users Manual.pdf" for the entire text of the user's manual.

> "This device complies with FCC rule Part 15 and with applicable ISED Canada RSS standards. Operation is subject to the following two conditions:
> (1) This device may not cause harmful interference,
> (2) This device must accept any interference that may be received including interference that may cause undesired operation.
> WARNING: The transmitter has been tested and complies with FCC and ISED rules. Changes or modifications not expressly approved by the party responsible for the compliance could void the user's authority to operate the device."
>
> This equipment complies with FCC and ISED radiation exposure limits set forth for an uncontrolled environment. End users must follow the specific operating instructions for satisfying RF exposure compliance. This transmitter must be at least 20cm from the user and must not be co-located or operating in conjunction with any other antenna or transmitter.

The term "ISED:" before the certification/registration number only signifies that ISED technical specifications were met.

ISED: 4112A-UAGTMB FCC ID: NZLUAGTMB MODEL: UAGTMB

2.2. Label Drawing and Location on Product

The label drawing is included in the "Label.pdf" attachment.

A diagram showing the location of the label on the assembly is included in the "Label Location.pdf" attachment.

3. Test Configuration

Radiated Emission measurements presented in the report were made in accordance with ANSI C63.26-2015. The EUT was placed on a 1 x 1.5m non-metallic table elevated 80cm above a conducting ground plane for measurements below 1GHz and elevated to 1.5m for measurements above 1GHz. The harness was run straight down from the center of the turntable to a power supply connection sitting at the base of the table. The power supply is located beneath the floor of the chamber.

For radiated measurements above 1 GHz, RF absorbing material is placed between the antenna and EUT in accordance with ANSI C63.4:2014 Section 5.5 and chamber manufacturer's instructions.

4. Block Diagram

For system block diagram please refer to attachment named "Block Diagram.pdf"

5. Conducted Emissions Measurements

Conducted Measurements are not required for this product.

6. Radiated Emissions Data

6.1. Date(s) Tested: 6/3/19 – 6/7/19, 6/18/19 – 6/19/19

6.2. Test Method Deviations: None.

6.3. Temperature and Humidity conditions

	Measured Value	Unit
Temperature	21.1	ºC
Humidity	46.7	%R.H.

6.4. Summary of Results

Measurement		Margin	Frequency
Worst Case Output Power	8.24 dBm	21.76 dB	915MHz
Worst Case Harmonic	-38.62 dBm	36.81 dB	1829.8MHz
Maximum Occupied BW	5.38MHz	6.62MHz	915MHz
Worst case Digital Emission	46.07 dBuV/m	7.93 dB	4.78622GHz

- **Measurement Uncertainty:** The standard uncertainty of measurement has been determined in accordance with the ISO Guide to the Expression of Uncertainty in Measurements. The estimation of measurement uncertainty reported is the expanded uncertainty for a coverage factor of k=2.26 and confidence interval of approximately 95%.

Expanded Uncertainty $U_{(k=2.26)}$ is as follows:

- Radiated Emissions – Bicon (30-250 MHz): 4.5 dB
- Radiated Emissions – LPA (250-1000 MHz): 4.2 dB
- Radiated Emissions – DRWG (1-18 GHz): 5.0 dB
- Frequency: 0.15ppm

6.5. Test Equipment Setup and Procedure

6.5.1. Test Equipment Used

Description	Model #	ID Number	Last Cal Date	Cal Due
EMCO Biconical Antenna [30-250 MHz]	3110B	H6189	7/16/18	7/16/21
EMCO LPA Antenna [250-1000MHz]	3148	H6192	7/16/18	7/16/21
Com-Power Double Ridged Waveguide [1-18GHz]	AH-118	7182	12/4/18	12/4/21
Rohde & Schwarz EMI Receiver	ESR26	6595	8/31/18	8/31/19
Cables, attenuator and port feed through	various	3M Port Combo	3/31/19	3/31/20
Miteq Preamplifier	AMF-4D-0050100-24-10P	S/N:2053240	3/31/19	3/31/20
3m Chamber SW	N/A	SW30	3/31/19	3/31/20

EMI Receiver Settings Emissions:

Detector Function:	Peak
Resolution Bandwidth:	120 kHz (below 1GHz)
	1MHz (above 1GHz)

EMI Receiver (in Spectrum Analyzer mode) Settings Occupied Bandwidth:

Detector:	Peak
Resolution Bandwidth:	1 MHz (to determine peak level)
	10 kHz (to determine occupied bandwidth)
Video Bandwidth:	3 MHz (to determine peak level)
	30 kHz (to determine occupied bandwidth)

For the testing, the EUT was placed at the center of a non-conducting table 80cm above the ground plane pursuant to ANSI C63.26:2015 for stand-alone equipment. The 2-conductor harness was run straight down from the center of the turntable to a power supply connection sitting at the base of the table.

Equipment is placed in one of the three orthogonal orientations, End, Side, and Flat where applicable. These orientations are described below in Figure 6.2.1.

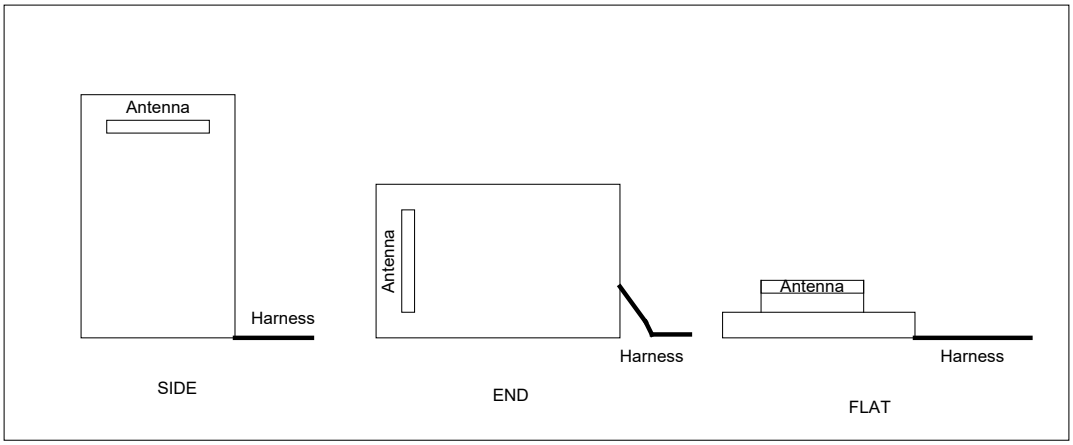


Figure 6.2.1 EUT Orthogonal Orientations

While in the prescribed orientation, the vertical antenna positioner sweeps in elevation from 1 to 4m in height until the operator finds the peak. The 3m turntable is then rotated through 360 degrees until a peak is found. The table is stopped at the peak location and the peak in elevation re-verified. Procedure is repeated for applicable orientations/measurement antenna polarizations.

6.6. Measured Data – See Appendix A

7. Other Attachments and Description

7.1. User Manual

Please refer to attachment “User_manual.pdf”.

7.2. Schematics / Tuning Information

For schematics please refer to exhibit “Schematics.pdf”.

7.3. Emission Designation

According to TRC-43, the emission designation for this product is 5M38L1D. Where “5M38” is the highest measured occupied bandwidth, “L” indicates the device uses pulse width modulation, “1” indicates the modulation as being single channel, digital information and “D” indicates that data is being transmitted.

7.4. Theory of Operation

Please refer to attachment “Theory of operation”

7.5. Label Drawing and Location on Complete Assembly

For a drawing of the label and the position of the label on the finished assembly refer to “Label Location”.

7.6. Photos

For interior photos, refer to exhibit “Interior Photographs”.

For exterior photos, refer to exhibit “Exterior Photographs”.

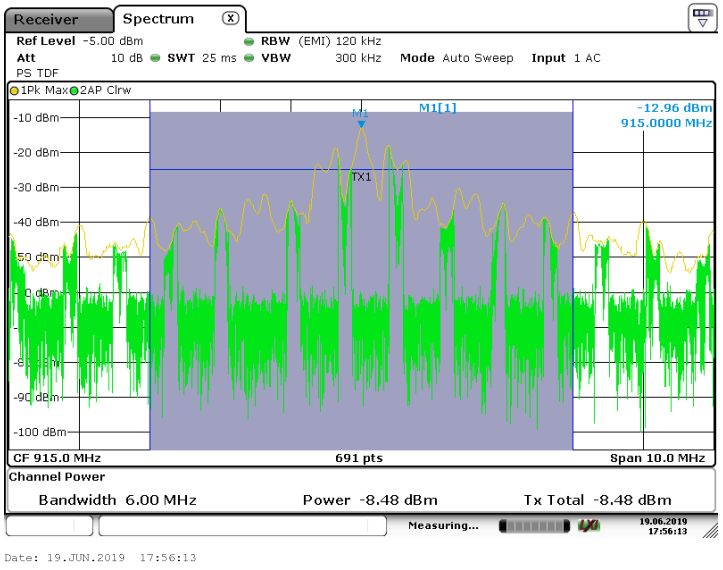
For test setup photos, refer to exhibit “Test Setup Photographs”.

Appendix A

A. Radiated (Tx) Measurements

1. **Transmitter Output Power –**The radio frequency power output was measured in a 3m Semi-Anechoic chamber. The design offers no provision for connection to the antenna port. The Effective Radiated Power or E.R.P was calculated based on the peak power measurement. The DUT was placed on a turntable elevated as required above the ground plane at a distance of 3 meters from the measurement antenna. The turntable was rotated through 360 degrees to locate the maximum amplitude emission. The frequency spectrum was searched for the maximum emission generated. Emission level was measured and recorded for the maximum amplitude. For measurement of the modulated signal, due to an occupied bandwidth greater than 5MHz, a Channel Power or Integrated measurement was performed allowing for a bandwidth of 6MHz. See screenshot below for reference.

   The device was found to be in compliance with the limits of Part 90.205 and RSS-137 section 6.4 of 30W ERP with +/-1 dB manufacturers rated value.



Frequency (MHz)	Mode	Peak Power Measurement (dbuV/m)	ERP (W)	ERP (mw)	ERP (dBm)
915	CW	98.7	0.0014	1.356	1.3228
915	Modulated	95.51	0.0007	0.651	-1.8672

Orientation – In-Vehicle

Frequency (MHz)	Mode	Peak Power Measurement (dbuV/m)	ERP (W)	ERP (mw)	ERP (dBm)
915	CW	100.27	0.0019	1.947	2.8928
915	Modulated	94.37	0.0005	0.500	-3.0072

Orientation – Side

Frequency (MHz)	Mode	Peak Power Measurement (dbuV/m)	ERP (W)	ERP (mw)	ERP (dBm)
915	CW	105.62	0.0067	6.672	8.2428
915	Modulated	97.85	0.0011	1.115	0.4728

Orientation - End

The peak power measurement includes the corrections for antenna gain, cable loss, and preamp gain where applicable.

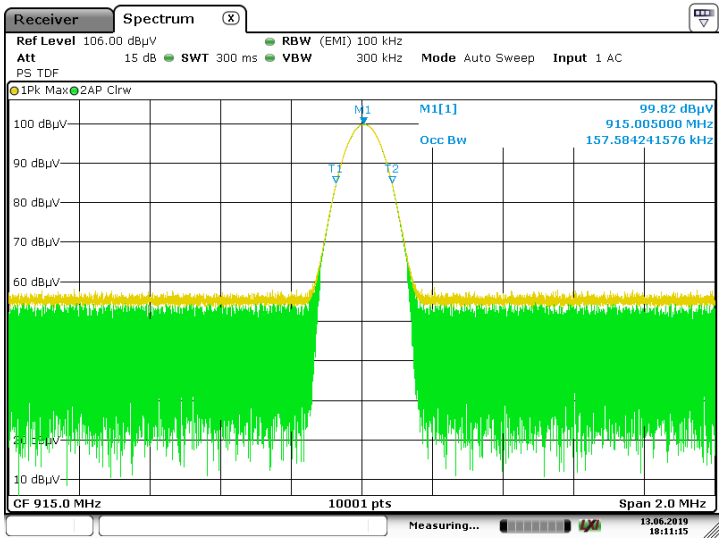
Formula: ERP (Watts) = $(((10^{((dBuV/m-(120/20))}*3)^{2})/30)/1.64)$

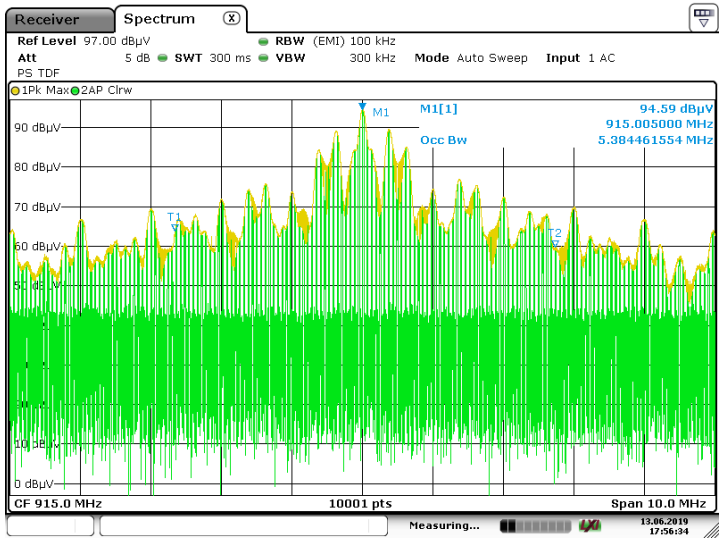
2. Occupied Bandwidth

The DUT demonstrated compliance with the requirements of Paragraphs 47CFR Part 90.209 and RSS-137 paragraph 6.1.2 of 12MHz. See plot below for reference.

Results

Frequency (MHz)	Mode	99% Occupied Bandwidth (kHz)
915	CW	157.58
915	Modulated	5380





3. Modulation Characteristics

The radio frequency output was coupled to a Rhode & Schwarz ESU26 Receiver. The receiver was used to observe the radio frequency spectrum with the transmitter operating in normal mode.

The transmitter operates providing digital data, transmitted signals modulated in amplitude/width/duration. The DUT demonstrated compliance with the specifications of Paragraphs 47CFR Part 2.1046(a), 90.205, and RSS-137.

4. Harmonic Emissions

Data was taken per 47CFR Part 2.1051 and applicable parts of 47CFR 90.210 and RSS-137. The frequency spectrum from 9 kHz to 10 GHz was observed.

The DUT demonstrated compliance with the specifications of 47CFR Part 2.1051, 2.1057, 90.210(k) and RSS-137. Measurement settings of 1MHz RBW and 3MHz VBW.

The table shows that the minimum level below the carrier was 35.12dBc which is within limit.

Formula: Minimum Required Attenuation = 55 + 10 * Log (Maximum CW/Modulated Output Power in Watts)

CW Minimum Attenuation

55 + 10 * Log (0.0067) = 33.2dB

Modulated Minimum Attenuation

55 + 10 * Log (0.0011) = 25.5dB

Fundamental	Measurement Frequency	Polarization	Measured Level (dBm)	Minimum Required Attenuation	Level Below Carrier (dBc)
CW					
914.9	1829.8	H	-39.54	**33.2**	40.86
	1829.8	V	-37.26		38.58
	2744.7	H	-35.12		**36.44**
	2744.7	V	-56.26		57.58
	3659.6	H	-50.12		51.44
	3659.6	V	-51.22		52.54
	4574.5	H	-51.32		52.64
	4574.5	V	-53.21		54.53
	5489.4	H	-53.44		54.76
	5489.4	V	-51.24		51.24
	6404.3	H	-49.52		50.84
	6404.3	V	-50.44		51.76
Modulated					
914.9	1829.8	H	-41.32	**25.5**	39.45
	1829.8	V	-48.26		46.39
	2744.7	H	-56.24		54.37
	2744.7	V	-58.32		56.45
	3659.6	H	-53.24		51.37
	3659.6	V	-52.41		50.54
	4574.5	H	-54.36		52.49
	4574.5	V	-55.98		54.11
	5489.4	H	-57.48		55.61
	5489.4	V	-56.89		55.02
	6404.3	H	-55.41		53.54
	6404.3	V	-53.64		51.77

Orientation – In-Vehicle

Fundamental	Measurement Frequency	Polarization	Measured Level (dBm)	Minimum Required Attenuation	Level Below Carrier (dBc)
CW					
914.9	1829.8	H	-39.55	**33.2**	42.44
	1829.8	V	-47.55		50.44
	2744.7	H	-54.65		57.54
	2744.7	V	-59.54		62.43
	3659.6	H	-52.35		55.24
	3659.6	V	-53.14		56.03
	4574.5	H	-53.26		56.15
	4574.5	V	-55.26		58.15
	5489.4	H	-55.74		58.63
	5489.4	V	-55.99		58.88
	6404.3	H	-51.32		54.21
	6404.3	V	-52.33		55.22
Modulated					
914.9	1829.8	H	-41.23	**25.5**	**38.22**
	1829.8	V	-47.56		44.55
	2744.7	H	-56.44		53.43
	2744.7	V	-59.31		56.30
	3659.6	H	-53.21		50.20
	3659.6	V	-52.33		49.32
	4574.5	H	-55.46		52.45
	4574.5	V	-57.46		54.45
	5489.4	H	-58.33		55.32
	5489.4	V	-56.24		53.23
	6404.3	H	-54.22		51.21
	6404.3	V	-53.26		50.25

Orientation – Side

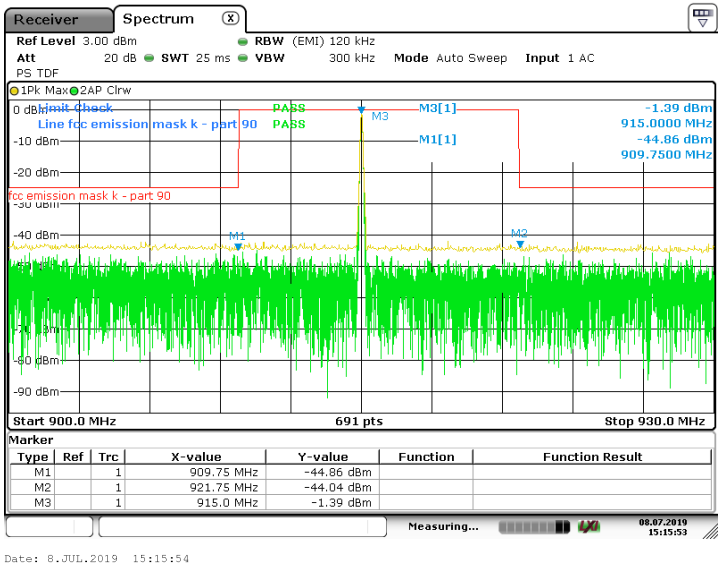
Fundamental	Measurement Frequency	Polarization	Measured Level (dBm)	Minimum Required Attenuation	Level Below Carrier (dBc)
CW					
914.9	1829.8	H	-38.54	**33.2**	46.78
	1829.8	V	-47.26		55.50
	2744.7	H	-54.33		62.57
	2744.7	V	-57.56		65.80
	3659.6	H	-50.32		58.56
	3659.6	V	-51.47		59.71
	4574.5	H	-51.77		60.01
	4574.5	V	-54.68		62.92
	5489.4	H	-54.78		63.02
	5489.4	V	-54.66		62.90
	6404.3	H	-49.26		57.50
	6404.3	V	-50.32		58.56
Modulated					
914.9	1829.8	H	-39.54	**25.5**	**40.01**
	1829.8	V	-47.33		47.80
	2744.7	H	-55.62		56.09
	2744.7	V	-58.45		58.92
	3659.6	H	-51.47		51.94
	3659.6	V	-50.66		51.13
	4574.5	H	-53.47		53.94
	4574.5	V	-55.84		56.31
	5489.4	H	-57.45		57.92
	5489.4	V	-55.86		56.33
	6404.3	H	-55.24		55.71
	6404.3	V	-53.12		53.59

Orientation – End

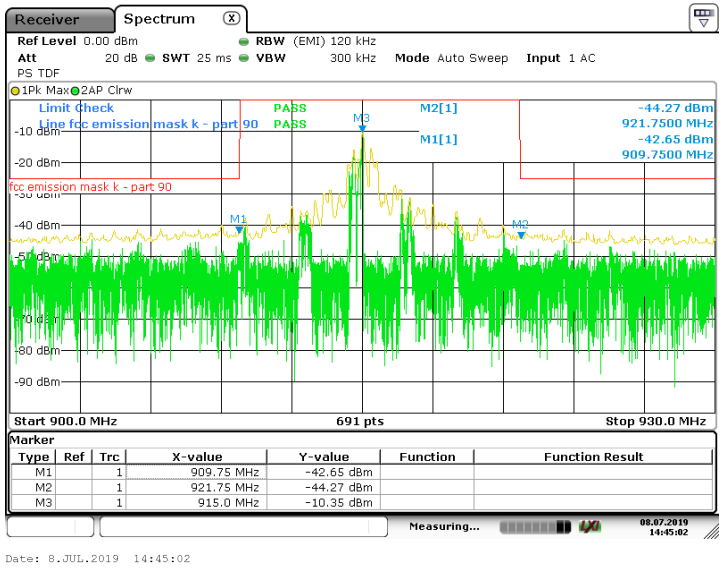
5. Emission Mask

Transmitters used in the radio services governed by this part must comply with the emissions masks outlined in this section. Paragraph 90.210(k)(3) Other Transmitters specifies the out of band emission limitations for this equipment. The spurious emissions for the device were measured at the maximum power output condition.

The DUT demonstrated compliance with the specifications of Paragraphs 47CFR Part 90.210(k)(3), and RSS-137 section 6.5.3, see plot below for reference.



CW Mode



Modulated Mode

6. Frequency Stability

Frequency stability measurements were taken in a temperature chamber. Per 47CFR Part 90.213 Note 14, and RSS-137 section 6.3, the carrier frequency shall not depart from the reference frequency in excess of +/- 2.5 ppm for any type of equipment unless indicated otherwise. *Note: Fixed Non-LMS transmitters with an emission bandwidth located more than 40kHz from the band edge, intermittenly operated hand-held readers and mobile transponders are exempt from meeting the frequency stability limit.*

Frequency Stability				
Temperature (C)	Input Voltage (V)	Nominal Frequency (Hz)	Measured Frequency (Hz)	Measured Variation (ppm)
-30	10.2	914,803,000	914,678,000	136.641
-30	12.0	914,803,000	914,678,000	136.641
-30	13.8	914,803,000	914,678,000	136.641
-20	10.2	914,803,000	914,715,000	96.196
-20	12.0	914,803,000	914,713,000	98.382
-20	13.8	914,803,000	914,720,000	90.730
-10	10.2	914,803,000	914,735,000	74.333
-10	12.0	914,803,000	914,740,000	68.867
-10	13.8	914,803,000	914,735,000	74.333
0	10.2	914,803,000	914,763,000	43.725
0	12.0	914,803,000	914,765,000	41.539
0	13.8	914,803,000	914,760,000	47.005
10	10.2	914,803,000	914,805,000	2.186
10	12.0	914,803,000	914,803,000	0.000
10	13.8	914,803,000	914,805,000	2.186
20	10.2	914,803,000	914,810,000	7.652
20	12.0	N/A	914,803,000	N/A
20	13.8	914,803,000	914,815,000	13.118
30	10.2	914,803,000	914800000	3.279
30	12.0	914,803,000	914,803,000	0.000
30	13.8	914,803,000	914,803,000	0.000
40	10.2	914,803,000	914,810,000	7.652
40	12.0	914,803,000	914,803,000	0.000
40	13.8	914,803,000	914,805,000	2.186
50	10.2	914,803,000	914,808,000	5.466
50	12.0	914,803,000	914,810,000	7.652
50	13.8	914,803,000	914,808,000	5.466