

# ENGINEERING TEST REPORT



**Wireless POS Terminal Base  
Model No.: NBS5030B001**

**FCC ID: O3JNBS5030**

*Applicant:*

**NBS Payment Solutions**  
703 Evans Ave., Suite 400  
Toronto, Ontario  
Canada, M9C 5E9

*In Accordance With*

**FEDERAL COMMUNICATIONS COMMISSION (FCC)  
PART 15, SUBPART C, SECTION 15.247  
Frequency Hopping (Bluetooth)  
Operating in the Frequency Band 2402-2480 MHz**

**UltraTech's File No.: MIS-068F15C247\_B**

This Test report is Issued under the Authority of  
Tri M. Luu, Professional Engineer,  
Vice President of Engineering  
UltraTech Group of Labs



Date: October 25, 2007

Report Prepared by: JaeWook Choi

Tested by: Hung Trinh, RFI Technologist

Issued Date: October 25, 2007

Test Dates: September 30, 2007 & October 17,  
2007

- *The results in this Test Report apply only to the sample(s) tested, and the sample tested is randomly selected.*
- *This report must not be used by the client to claim product endorsement by NVLAP or any agency of the US Government.*

## UltraTech

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SL2-IN-E-1119R

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## EXHIBIT 1 INTRODUCTION

### 1.1 SCOPE

|                                      |  |
|--------------------------------------|--|
| <b>Reference:</b>                    | Part 15, Subpart C, Section 15.247   |
| <b>Title:</b>                        | Telecommunication - Code of Federal Regulations, CFR 47, Part 15   |
| <b>Purpose of Test:</b>              | To gain FCC Equipment Authorization for Frequency Hopping (Bluetooth) Operating in the Frequency Band 2402-2480 MHz.   |
| <b>Test Procedures:</b>              | Both conducted and radiated emissions measurements were conducted in accordance with American National Standards Institute ANSI C63.4 - 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. |
| <b>Environmental Classification:</b> | Commercial, light industry & heavy industry  |

### 1.2 RELATED SUBMITTAL(S)/GRANT(S)

None.

### 1.3 NORMATIVE REFERENCES

| Publication                 | Year                             | Title   |
|-----------------------------|----------------------------------|---|
| FCC 47CFR Parts 0-19        | 2005                             | Code of Federal Regulations, Title 47 – Telecommunication   |
| ANSI C63.4                  | 2003                             | 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 |
| CISPR 22 +A1<br>EN 55022    | 2003-04-10<br>2004-10-14<br>2003 | Limits and Methods of Measurements of Radio Disturbance Characteristics of Information Technology Equipment   |
| CISPR 16-1-1                | 2003                             | Specification for radio disturbance and immunity measuring apparatus and methods.<br>Part 1-1: Measuring Apparatus  |
| CISPR 16-2-1                | 2003                             | Specification for radio disturbance and immunity measuring apparatus and methods.<br>Part 2-1: Conducted disturbance measurement                                    |
| CISPR 16-2-3                | 2003                             | Specification for radio disturbance and immunity measuring apparatus and methods.<br>Part 2-3: Radiated disturbance measurement                                     |
| FCC Public Notice DA 00-705 | 2000                             | Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems   |
| KDB Publication No. 558074  | 2005                             | Guidance on Measurements for Digital Transmission Systems (47 CFR 15.247)   |

#### ULTRATECH GROUP OF LABS

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File #: MIS-068F15C247\_B  
 October 25, 2007

All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

## EXHIBIT 2 PERFORMANCE ASSESSMENT

### 2.1 CLIENT INFORMATION

|                        |  |
|------------------------|--|
| <b>APPLICANT:</b>      |  |
| <b>Name:</b>           | NBS Payment Solutions  |
| <b>Address:</b>        | 703 Evans Ave., Suite 400<br>Toronto, ON<br>Canada, M9C 5E9  |
| <b>Contact Person:</b> | Mr. Dragoslav Jovanovic<br>Phone #: 416-621-7410<br>Fax #: 416-621-2450<br>Email Address: <a href="mailto:djovanovic@nbsps.com">djovanovic@nbsps.com</a> |

|                        |  |
|------------------------|--|
| <b>MANUFACTURER:</b>   |  |
| <b>Name:</b>           | SAGEM Monetel  |
| <b>Address:</b>        | 1, Rue Claude Chappe – BP346<br>Guilherand-Granges<br>France, 07503  |
| <b>Contact Person:</b> | Clement Lormeau, Customer Service<br>Phone #: +33.4.75.81.40.47<br>Fax #: +33.4.75.81.41.57<br>Email Address: <a href="mailto:clement.lormeau@sagem.com">clement.lormeau@sagem.com</a> |

### 2.2 EQUIPMENT UNDER TEST (EUT) INFORMATION

The following information (with the exception of the Date of Receipt) has been supplied by the applicant.

|                                       |                            |
|---------------------------------------|----------------------------|
| <b>Brand Name:</b>                    | NBS Payment Solutions      |
| <b>Product Name:</b>                  | Wireless POS Terminal Base |
| <b>Model Name or Number:</b>          | NBS5030B001                |
| <b>Serial Number:</b>                 | 06108PT40011308            |
| <b>Type of Equipment:</b>             | Bluetooth (FHSS)           |
| <b>Input Power Supply Type:</b>       | AC/DC Adapter 5V DC / 1A   |
| <b>Primary User Functions of EUT:</b> | Financial Transactions     |

#### ULTRATECH GROUP OF LABS

3000 Bristol Circle, Oakville, Ontario, Canada L6H 6G4  
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File #: MIS-068F15C247\_B  
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All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

### 2.3 EUT'S TECHNICAL SPECIFICATIONS

| TRANSMITTER                     |  |
|---------------------------------|--|
| Equipment Type:                 | Mobile   |
| Intended Operating Environment: | Commercial, light industry & heavy industry  |
| Power Supply Requirement:       | 3.3 VDC  |
| RF Output Power Rating:         | 0.0478 W conducted (18.79 dBm EIRP in 1MHz)  |
| Operating Frequency Range:      | 2402-2480 MHz  |
| RF Output Impedance:            | 50 Ω   |
| Channel Spacing:                | 1 MHz  |
| Duty Cycle:                     | 100%   |
| Modulation Type:                | Bluetooth (FHSS)   |
| Antenna Connector Type:         | Chip Antenna (internal)  |
| Antenna Description:            | Manufacturer: TAIYO YUDEN<br>Type: Bluetooth<br>Model No.: AH 104F2450S1<br>Frequency Range: 2.4 – 2.5 GHz<br>Gain: 2 dBi (peak) |

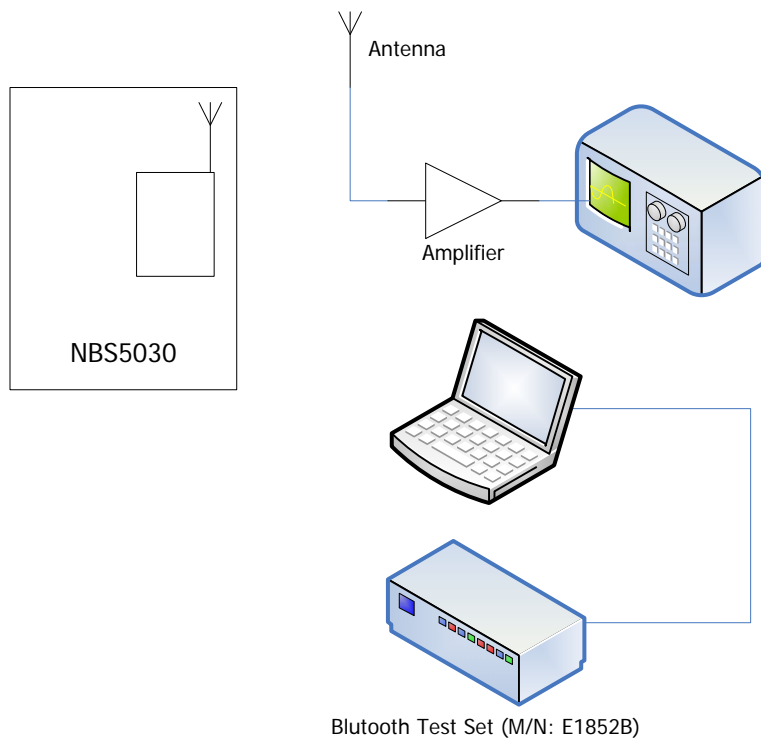
### 2.4 LIST OF EUT'S PORTS

| Port Number | EUT's Port Description | Number of Identical Ports | Connector Type | Cable Type (Shielded/Non-shielded) |
|-------------|------------------------|---------------------------|----------------|------------------------------------|
| 1           | USB port               | 1                         | USB Type B     | Shielded                           |
| 2           | External Power Supply  | 1                         | Male Plug      | Shielded                           |
| 3           | Phone Jack Plug (COM1) | 1                         | RJ-9 4 pin     | Non-shielded                       |
| 4           | LAN port               | 1                         | RJ-45 8 pin    | Non-shielded                       |
| 5           | Phone Jack Plug (COM0) | 1                         | RJ-11 6 pin    | Non-shielded                       |

### 2.5 ANCILLARY EQUIPMENT

|   | Description        | Manufacturer | Model Number | Serial Number |
|---|--------------------|--------------|--------------|---------------|
| 1 | Bluetooth Test Set | Agilent      | E1852B       | DK42050131    |
| 2 | Laptop             | Toshiba      | 160SCDS/43   | 1027387CU     |

## 2.6 TEST SETUP BLOCK DIAGRAM



## EXHIBIT 3 EUT OPERATING CONDITIONS AND CONFIGURATIONS DURING TESTS

### 3.1 OPERATIONAL TEST CONDITIONS & ARRANGEMENT FOR TESTS

|                                  |   |
|----------------------------------|---|
| <b>Operating Modes:</b>          | <ul style="list-style-type: none"> <li>▪ Each of lowest, middle and highest channel frequencies transmits continuously for emissions measurements.</li> <li>▪ The EUT operates in frequency hopping mode and direct sequence or digital modulation mode.</li> </ul>                                 |
| <b>Special Test Software:</b>    | Special software is provided by the applicant to put the EUT into the test mode and Bluetooth test set was used to select and operate the EUT at each channel frequency continuously and mode of operation such as frequency hopping and direct sequence or digital modulation for testing purpose. |
| <b>Special Hardware Used:</b>    | N/A   |
| <b>Transmitter Test Antenna:</b> | The EUT is tested with the antenna fitted in a manner typical of normal intended use as integral antenna equipment.   |

|   |  |
|---|--|
| <b>Transmitter Test Signals</b>   |  |
| <b>Frequency Band(s):</b>   | 2402 - 2480 MHz                              |
| <b>Frequency(ies) Tested:</b><br>(Near lowest, near middle & near highest frequencies in the frequency range of operation.) | 2402, 2441 & 2480 MHz.                       |
| <b>RF Power Output:</b>   | 0.0478 W conducted (18.79 dBm EIRP in 1MHz ) |
| <b>Normal Test Modulation:</b>  | Bluetooth (FHSS)                             |
| <b>Modulating Signal Source:</b>  | Internal                                     |

## EXHIBIT 4 SUMMARY OF TEST RESULTS

### 4.1 LOCATION OF TESTS

All of the measurements described in this report were performed at Ultratech Group of Labs located in the city of Oakville, Province of Ontario, Canada.

AC Power Line Conducted Emissions were performed in UltraTech's shielded room, 24'(L) by 16'(W) by 8'(H).

Radiated Emissions were performed at the Ultratech's 3-10 TDK Semi-Anechoic Chamber situated in the Town of Oakville, province of Ontario. This test site been calibrated in accordance with ANSI C63.4, and found to be in compliance with the requirements of Sec. 2.948 of the FCC Rules. The descriptions and site measurement data of the Oakville 3-10 TDK Semi-Anechoic Chamber has been filed with FCC office (FCC File No.: 31040/SIT 1300B3) and Industry Canada office (Industry Canada File No.: IC2049A-3). Last Date of Site Calibration: May 17, 2007.

### 4.2 APPLICABILITY & SUMMARY OF EMC EMISSION TEST RESULTS

| FCC Section(s)             | Test Requirements                                     | Compliance (Yes/No)         |
|----------------------------|---|-----------------------------|
| 15.107(a) /15.207(a)       | AC Power Conducted Emissions                          | Yes <small>(Note 1)</small> |
| 15.109(a)                  | Class B Radiated Emissions                            | Yes <small>(Note 1)</small> |
| 15.247(a)(1)               | Channel Separation & 20dB Bandwidth                   | Yes                         |
| 15.247(a)(1)(iii)          | Number of Hopping Channel & Average Time of Occupancy | Yes                         |
| 15.247(b)(1)               | Peak Output Power                                     | Yes                         |
| 15.247(d), 15.209 & 15.205 | Radiated Spurious Emissions                           | Yes                         |
| 15.247(d)                  | Conducted Spurious Emissions                          | N/A <sub>(Note 2)</sub>     |
| 15.247(i), 1.1310 & 2.1091 | RF Exposure   | Yes                         |

#### Notes:

- (1) A separate engineering test report for compliance with FCC Part 15, Subpart B – Class B Unintentional Radiators will be provided upon request.
- (2) Antenna is soldered on the PCB board thus can not be removed.

### 4.3 MODIFICATIONS INCORPORATED IN THE EUT FOR COMPLIANCE PURPOSES

None.



## EXHIBIT 5 MEASUREMENTS, EXAMINATIONS & TEST DATA FOR EMC EMISSIONS

### 5.1 TEST PROCEDURES

This section contains test results only. Details of test methods and procedures can be found in ANSI C63.4; KDB Publication No. 558074: Guidance on Measurements for Digital Transmission Systems (47 CFR 15.247); FCC Public Notice DA 00-705: Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems.

### 5.2 MEASUREMENT UNCERTAINTIES

The measurement uncertainties stated were calculated in accordance with requirements of UKAS Document LAB 34 with a confidence level of 95%. Please refer to Exhibit 6 for Measurement Uncertainties.

### 5.3 MEASUREMENT EQUIPMENT USED

The measurement equipment used complied with the requirements of the Standards referenced in the Methods & Procedures ANSI C63.4 and CISPR 16-1.

### 5.4 COMPLIANCE WITH FCC PART 15 – GENERAL TECHNICAL REQUIREMENTS

| FCC Section | FCC Rules   |  |
|-------------|---|--|
| 15.203      | <p>Described how the EUT complies with the requirement that either its antenna is permanently attached, or that it employs a unique antenna connector, for every antenna proposed for use with the EUT.</p> <p>The exception is in those cases where EUT must be professionally installed. In order to demonstrate that professional installation is required, the following 3 points must be addressed:</p> <ul style="list-style-type: none"><li>• The application (or intended use) of the EUT</li><li>• The installation requirements of the EUT</li><li>• The method by which the EUT will be marketed</li></ul> | The integral antenna is permanently mounted on the printed circuit board and located inside the enclosure  |
| 15.204      | <p>Provided the information for every antenna proposed for use with the EUT:</p> <p>(a) type (e.g. Yagi, patch, grid, dish, etc...),<br/>(b) manufacturer and model number<br/>(c) gain with reference to an isotropic radiator</p>   | Manufacturer: TAIYO YUDEN Co., LTD<br>Type: 2.4GHz Multilayer Antenna<br>Model No.: AH 104F2450S1<br>Frequency Range: 2.4 – 2.5 GHz<br>Gain: > 0 dBi |

## 5.5 CHANNEL SEPARATION & 20 DB BANDWIDTH [§15.247(a)(1)]

### 5.5.1. Limits

- **§15.247(a)(1):** Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW.

### 5.5.2. Method of Measurements

Refer to FCC Public Notice DA 00-705, KDB Publication No. 558074 and ANSI C63.4 for measurement methods.

### 5.5.3. Test Arrangement

See Section 2.6 of this test report.

### 5.5.4. Test Equipment List

| Test Instruments                   | Manufacturer    | Model No. | Serial No. | Frequency Range  |
|------------------------------------|-----------------|-----------|------------|------------------|
| Spectrum Analyzer/<br>EMI Receiver | Rohde & Schwarz | FSEK30    | 100077     | 20 Hz – 40 GHz   |
| Amplifier                          | Hewlett Packard | 8449B     | 3008A00769 | 1 GHz – 26.5 GHz |
| Horn Antenna                       | EMCO            | 3155      | 9701-5061  | 1 GHz – 18 GHz   |
| Biconilog Antenna                  | EMCO            | 3143      | 1029       | 20 MHz – 2 GHz   |

### 5.5.5. Test Data

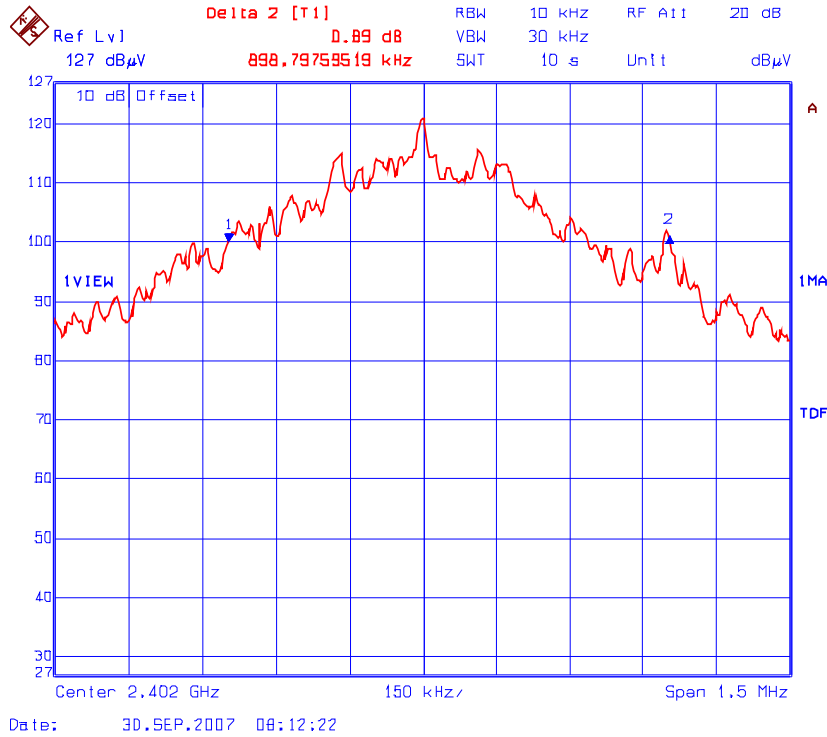
**Note:** Bandwidth measurements were done using the built-in auto function of the analyzer.

#### 5.5.5.1. For Frequency Hopping Spread Spectrum Mode

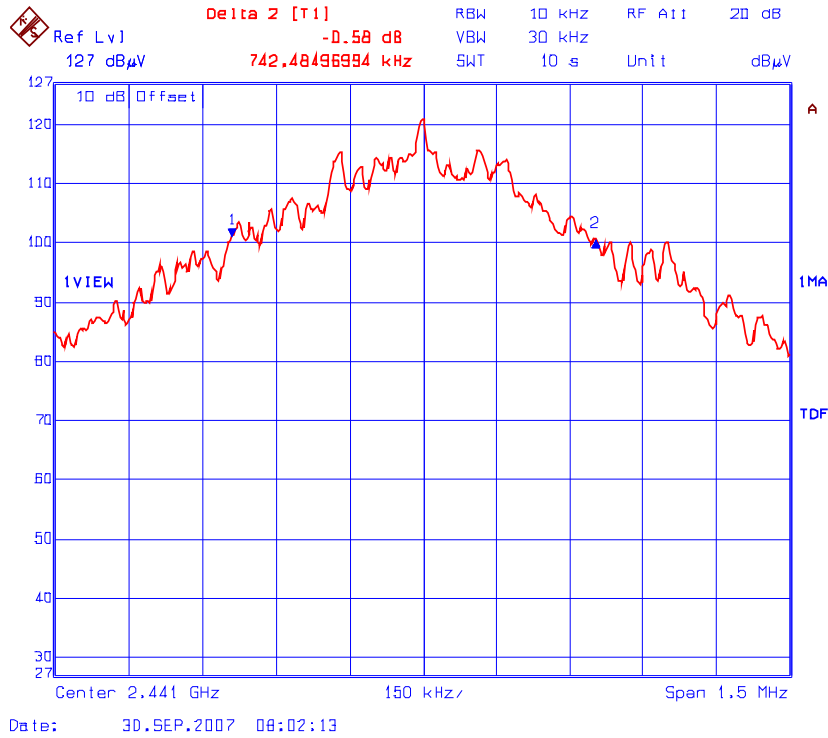
| Frequency (MHz) | 20 dB Bandwidth (kHz) |
|-----------------|-----------------------|
| 2402            | 898.80                |
| 2441            | 742.48                |
| 2480            | 1000.70               |

See the following plots for detailed measurements.

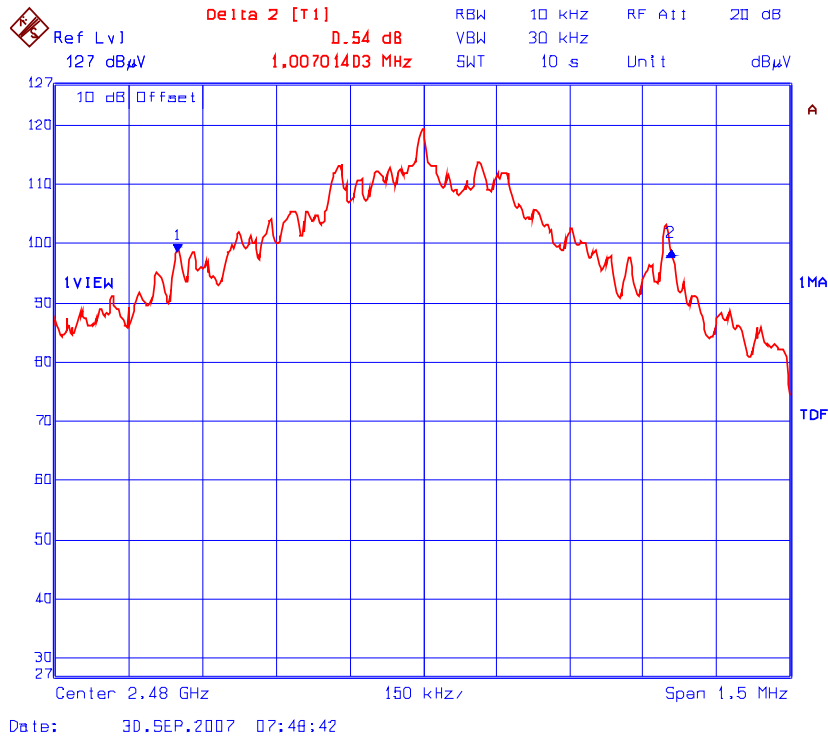
Plot 5.5.1.1.: 20 dB Bandwidth  
2402 MHz, Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



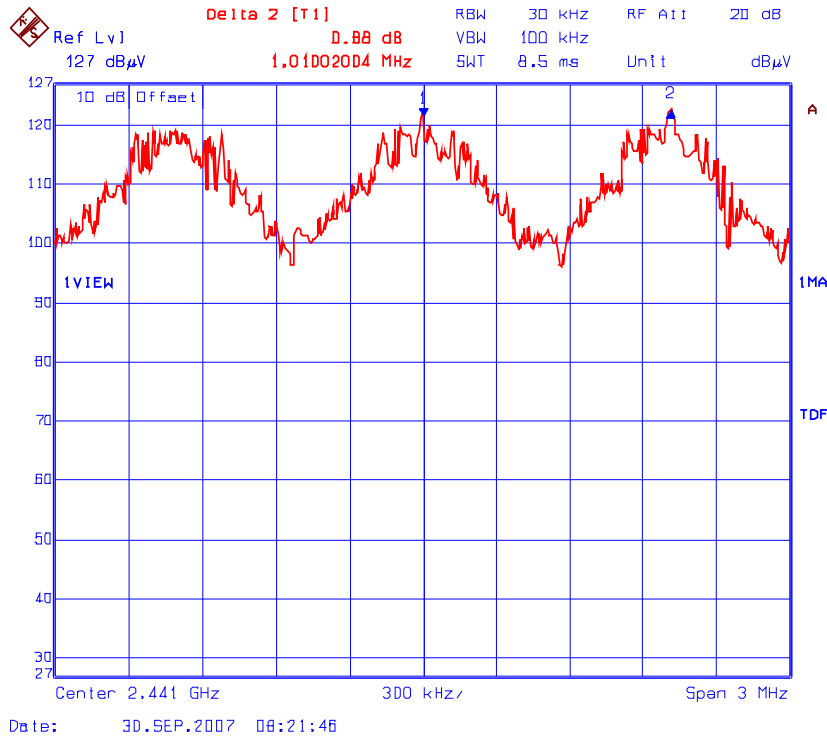
Plot 5.5.5.1.2.: 20 dB Bandwidth  
2441 MHz, Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



Plot 5.5.5.1.3.: 20 dB Bandwidth  
2480 MHz, Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



Plot 5.5.5.1.4.: Channel Separation  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), Hopping mode



## 5.6 NUMBER OF HOPPING CHANNEL & AVERAGE TIME OF OCCUPANCY [§ 15.247(a)(1)(iii)]

### 5.6.1. Limits

- **FCC 15.247(a)(1)(iii):** Frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed. Frequency hopping systems may avoid or suppress transmissions on a particular hopping frequency provided that a minimum of 15 channels are used.

### 5.6.2. Method of Measurements

Refer to FCC Public Notice DA 00-705, KDB Publication No. 558074 and ANSI C63.4 for measurement methods.

### 5.6.3. Test Arrangement

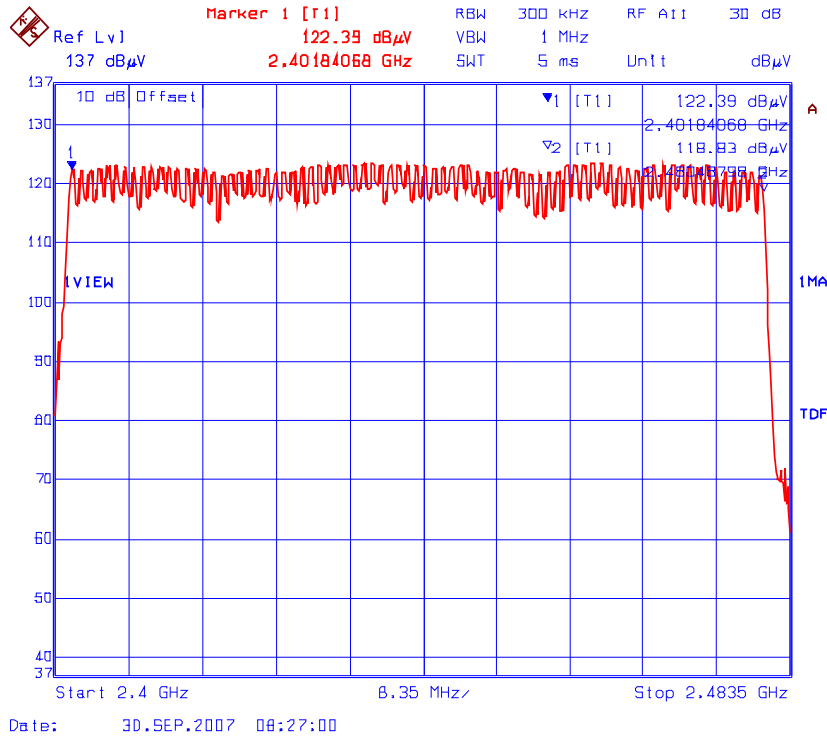
See Section 2.6 of this test report.

### 5.6.4. Test Equipment List

| Test Instruments                   | Manufacturer    | Model No. | Serial No. | Frequency Range  |
|------------------------------------|-----------------|-----------|------------|------------------|
| Spectrum Analyzer/<br>EMI Receiver | Rohde & Schwarz | FSEK30    | 100077     | 20 Hz – 40 GHz   |
| Amplifier                          | Hewlett Packard | 8449B     | 3008A00769 | 1 GHz – 26.5 GHz |
| Horn Antenna                       | EMCO            | 3155      | 9701-5061  | 1 GHz – 18 GHz   |
| Biconilog Antenna                  | EMCO            | 3143      | 1029       | 20 MHz – 2 GHz   |

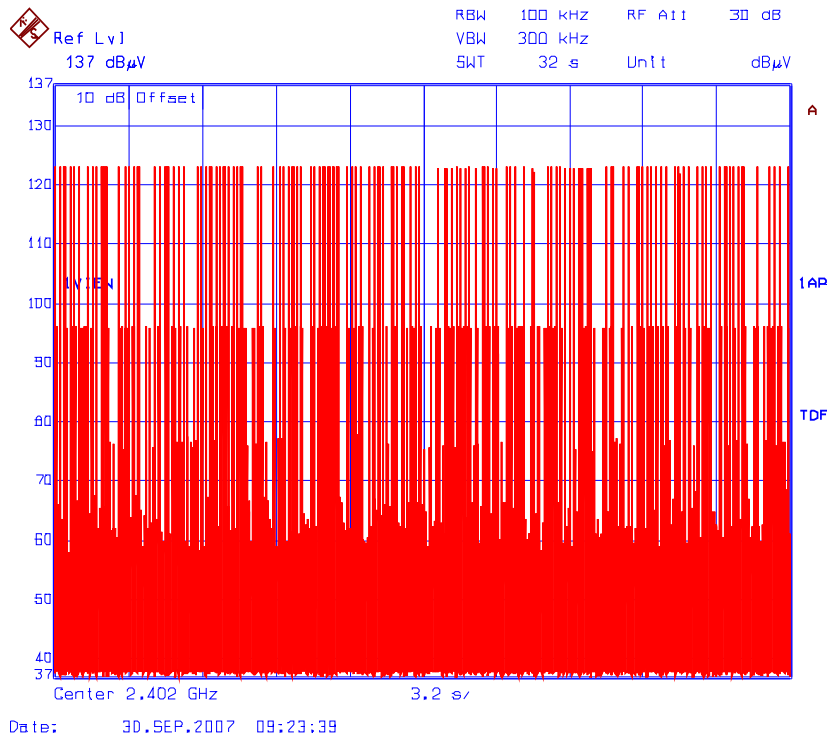
5.6.5. Test Data

Plot 5.6.5.1.: Number of hopping channel  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), Hopping mode - 79 channels

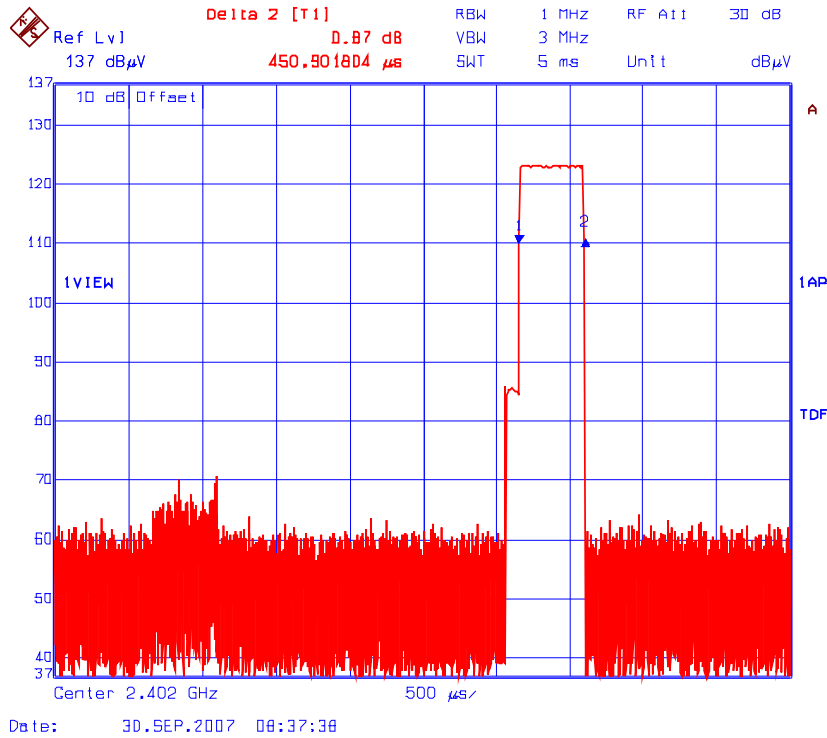




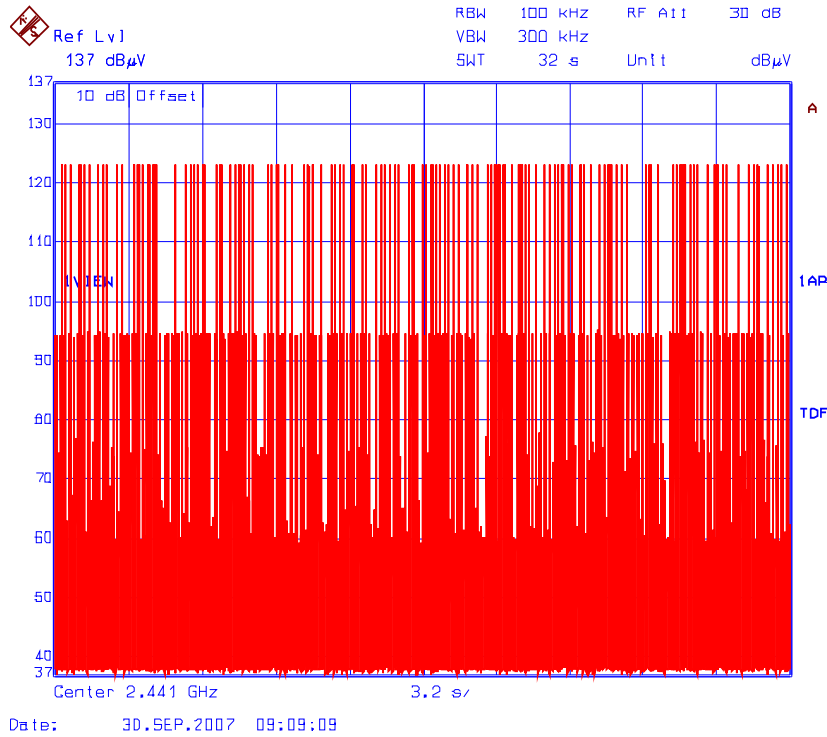
Plot 5.6.5.2.: Time of Occupancy at 2402 MHz #1  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)  
 $115 * 450.90\mu s = 51.85ms < 400ms$  within 31.6s ( $0.4s * 79$ )



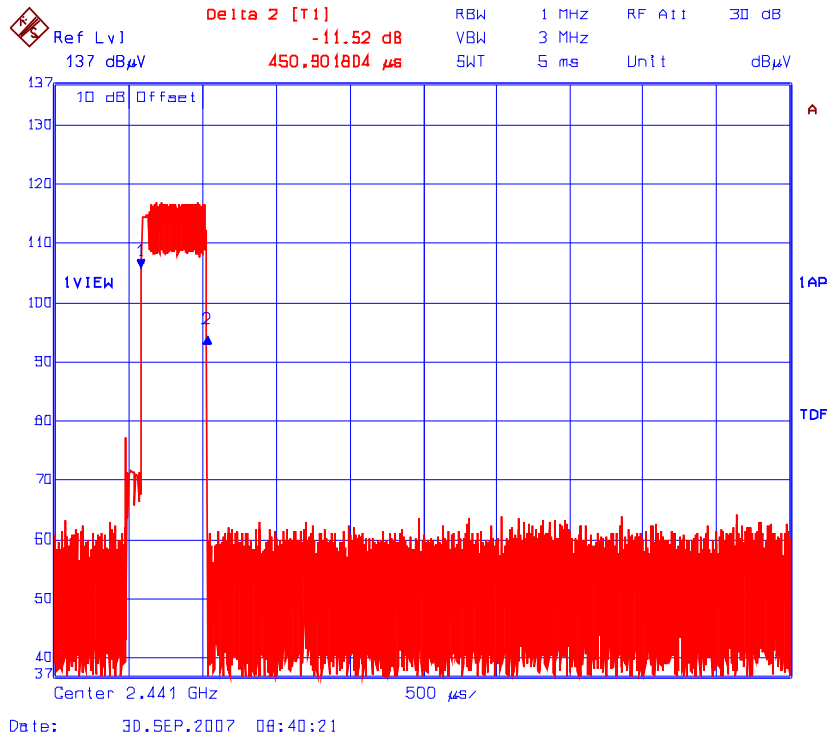
Plot 5.6.5.3.: Time of Occupancy at 2402 MHz #2  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



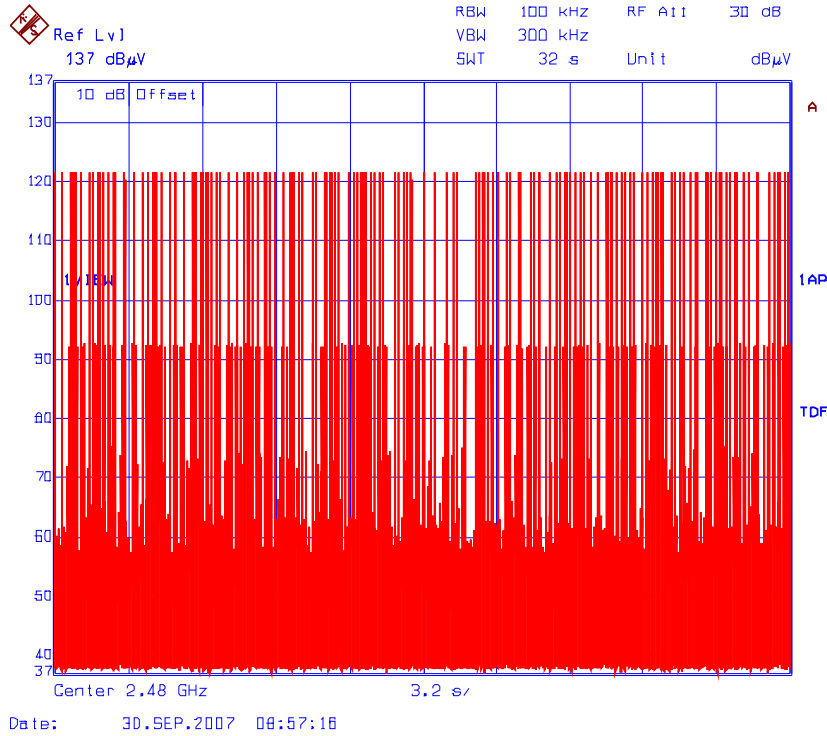
Plot 5.6.5.4.: Time of Occupancy at 2441Hz #1  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)  
 $115 * 450.90\mu s = 51.85ms < 400ms$  within 31.6s ( $0.4s * 79$ )



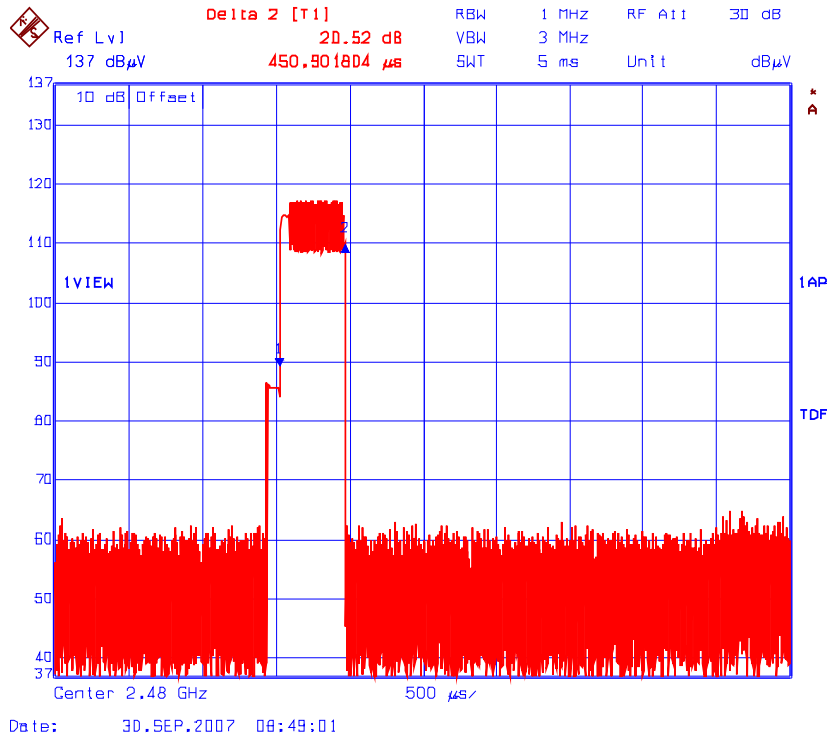
Plot 5.6.5.5.: Time of Occupancy at 2441Hz #2  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



Plot 5.6.5.6.: Time of Occupancy at 2480 MHz #1  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)  
 $115 * 450.90\mu s = 51.85ms < 400ms$  within 31.6s (0.4s \* 79)



Plot 5.6.5.7.: Time of Occupancy at 2480 MHz #2  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo)



## 5.7 PEAK OUTPUT POWER [§§ 15.247(b)(1)]

### 5.7.1. Limits

- **FCC 15.247(b)(1):** For frequency hopping systems operating in the 2400-2483.5 MHz band employing at least 75 non-overlapping hopping channels, and all frequency hopping systems in the 5725-5850 MHz band: 1 watt. For all other frequency hopping systems in the 2400-2483.5 MHz band: 0.125 watts.

### 5.7.2. Method of Measurements

Refer to FCC Public Notice DA 00-705, KDB Publication No. 558074 and ANSI C63.4 for measurement methods.

### 5.7.3. Test Arrangement

See Section 2.6 of this test report.

### 5.7.4. Test Equipment List

| Test Instruments                   | Manufacturer    | Model No. | Serial No. | Frequency Range  |
|------------------------------------|-----------------|-----------|------------|------------------|
| Spectrum Analyzer/<br>EMI Receiver | Rohde & Schwarz | FSEK30    | 100077     | 20 Hz – 40 GHz   |
| Amplifier                          | Hewlett Packard | 8449B     | 3008A00769 | 1 GHz – 26.5 GHz |
| Horn Antenna                       | EMCO            | 3155      | 9701-5061  | 1 GHz – 18 GHz   |
| Biconilog Antenna                  | EMCO            | 3143      | 1029       | 20 MHz – 2 GHz   |

### 5.7.5. Test Data

| Frequency (MHz) | E-Field in 1 MHz @ 3m (dBuV/m) | Antenna Polarization (V/H) | Power from Signal Gen. (dBm) | Subs. Ant. Horn Gain (dBi) | Measured Peak EIRP in 1MHz (dBm) | EIRP Limit (dBm) | Margin (dB) |
|-----------------|--------------------------------|----------------------------|------------------------------|----------------------------|----------------------------------|------------------|-------------|
| 2402            | 116.99                         | V                          | 10.89                        | 7.9                        | 18.79                            | 30               | -11.21      |
|                 | 113.77                         | H                          | 7.26                         | 7.9                        | 15.16                            | 30               | -14.84      |
| 2441            | 116.25                         | V                          | 9.42                         | 8.3                        | 17.72                            | 30               | -12.28      |
|                 | 112.32                         | H                          | 5.16                         | 8.3                        | 13.46                            | 30               | -16.54      |
| 2408            | 116.11                         | V                          | 7.35                         | 8.4                        | 16.75                            | 30               | -13.25      |
|                 | 111.34                         | H                          | 4.06                         | 8.4                        | 12.46                            | 30               | -17.54      |

\* Peak power is calculated using the following equation:

$$P = \frac{(E \times D)^2}{30 \times G}$$

Where: E – The measured maximum field strength in V/m  
G – The numeric gain of the transmitting antenna over an isotropic radiator  
D – The distance in meters from which the field strength was measured  
P – The power in watts

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File #: MIS-068F15C247\_B  
October 25, 2007

All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

## 5.8 RADIATED SPURIOUS EMISSIONS @ 3 METERS [§ 15.209 & § 15.247(d)]

### 5.8.1. Limits

- 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 Section 15.209(a) is not required.
- FCC 15.209:** In addition, radiated emissions which fall in the restricted bands, as defined in Section 15.205(a), must also comply with the radiated emission limits specified in Section 15.209(a) (see Section 15.205(c)).

**47 CFR 15.205(a) - Restricted Bands of Operation**

| MHz                        | MHz                   | MHz             | GHz           |
|----------------------------|-----------------------|-----------------|---------------|
| 0.090 - 0.110              | 16.42 - 16.423        | 399.9 - 410     | 4.5 - 5.15    |
| <sup>1</sup> 0.495 - 0.505 | 16.69475 - 16.69525   | 608 - 614       | 5.35 - 5.46   |
| 2.1735 - 2.1905            | 16.80425 - 16.80475   | 960 - 1240      | 7.25 - 7.75   |
| 4.125 - 4.128              | 25.5 - 25.67          | 1300 - 1427     | 8.025 - 8.5   |
| 4.17725 - 4.17775          | 37.5 - 38.25          | 1435 - 1626.5   | 9.0 - 9.2     |
| 4.20725 - 4.20775          | 73 - 74.6             | 1645.5 - 1646.5 | 9.3 - 9.5     |
| 6.215 - 6.218              | 74.8 - 75.2           | 1660 - 1710     | 10.6 - 12.7   |
| 6.26775 - 6.26825          | 108 - 121.94          | 1718.8 - 1722.2 | 13.25 - 13.4  |
| 6.31175 - 6.31225          | 123 - 138             | 2200 - 2300     | 14.47 - 14.5  |
| 8.291 - 8.294              | 149.9 - 150.05        | 2310 - 2390     | 15.35 - 16.2  |
| 8.362 - 8.366              | 156.52475 - 156.52525 | 2483.5 - 2500   | 17.7 - 21.4   |
| 8.37625 - 8.38675          | 156.7 - 156.9         | 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     | (2)           |
| 13.36 - 13.41              |                       |                 |               |

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

<sup>2</sup> Above 38.6



**47 CFR 15.209(a) - Radiated emission limits, general requirements**

| Frequency (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                             |

\*\* Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

**5.8.2. Method of Measurements**

Refer to Ultratech Test Procedures, Files # ULTR P002-2004 or ULTR P003-2004 and ANSI C63.4 for measurement methods

**5.8.3. Test Arrangement**

Refer to Section 2.6 of this test report for test setup.

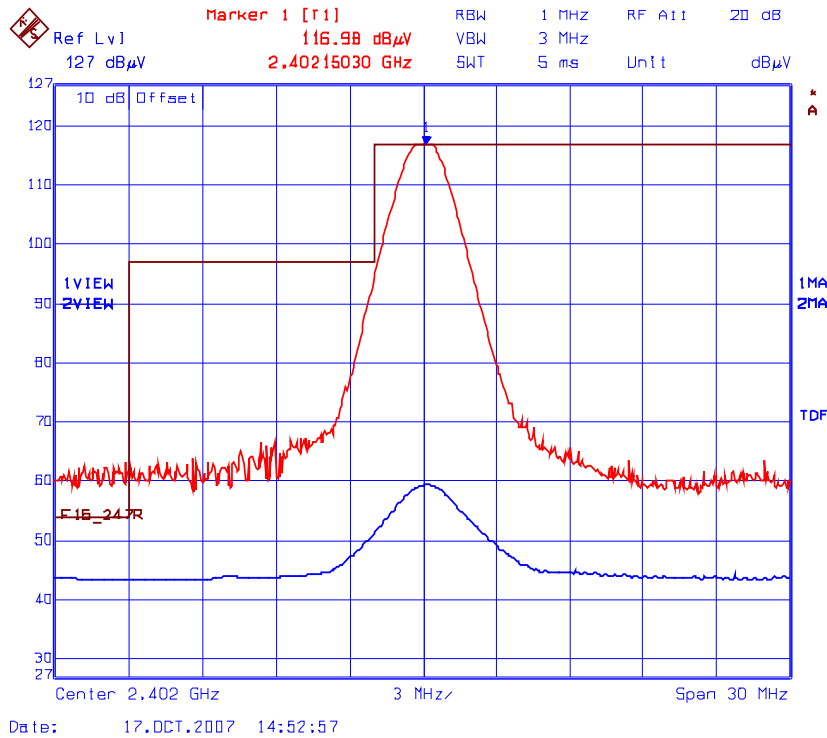
**5.8.4. Test Equipment List**

| Test Instruments                   | Manufacturer    | Model No. | Serial No. | Frequency Range  |
|------------------------------------|-----------------|-----------|------------|------------------|
| Spectrum Analyzer/<br>EMI Receiver | Rohde & Schwarz | FSEK30    | 100077     | 20 Hz – 40 GHz   |
| Amplifier                          | Hewlett Packard | 8449B     | 3008A00769 | 1 GHz – 26.5 GHz |
| Horn Antenna                       | EMCO            | 3155      | 9701-5061  | 1 GHz – 18 GHz   |
| Biconilog Antenna                  | EMCO            | 3143      | 1029       | 20 MHz – 2 GHz   |

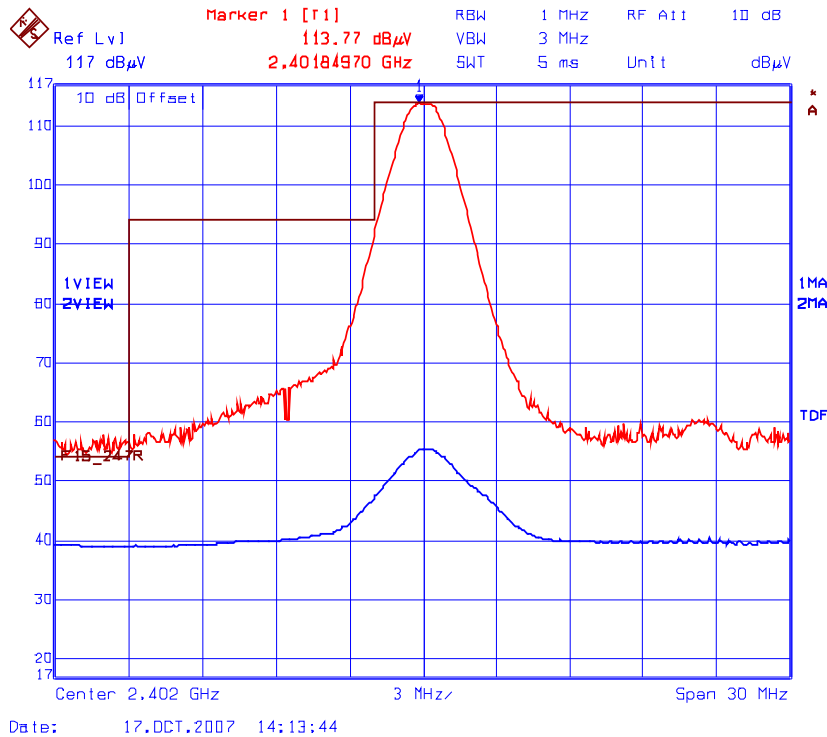
5.8.5. Test Data

5.8.5.1. Band-edge Radiated Emissions

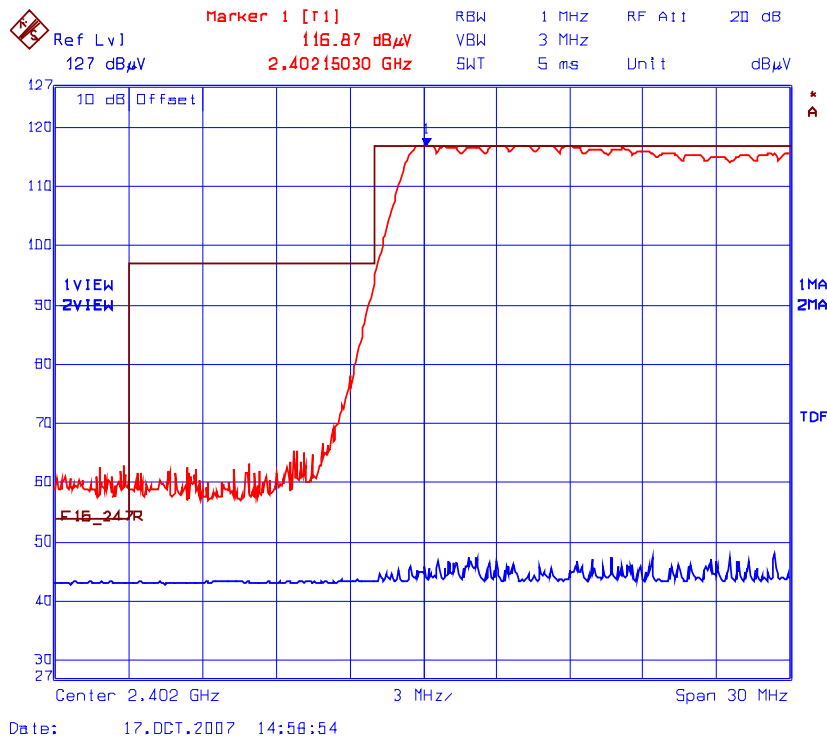
Plot 5.8.5.1.1.: Band-Edge Radiated Emissions @ 3 meters  
2402MHz, Lower Band-Edge Radiated Emissions Vertical Polarization, Continuous  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT lay flat  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)



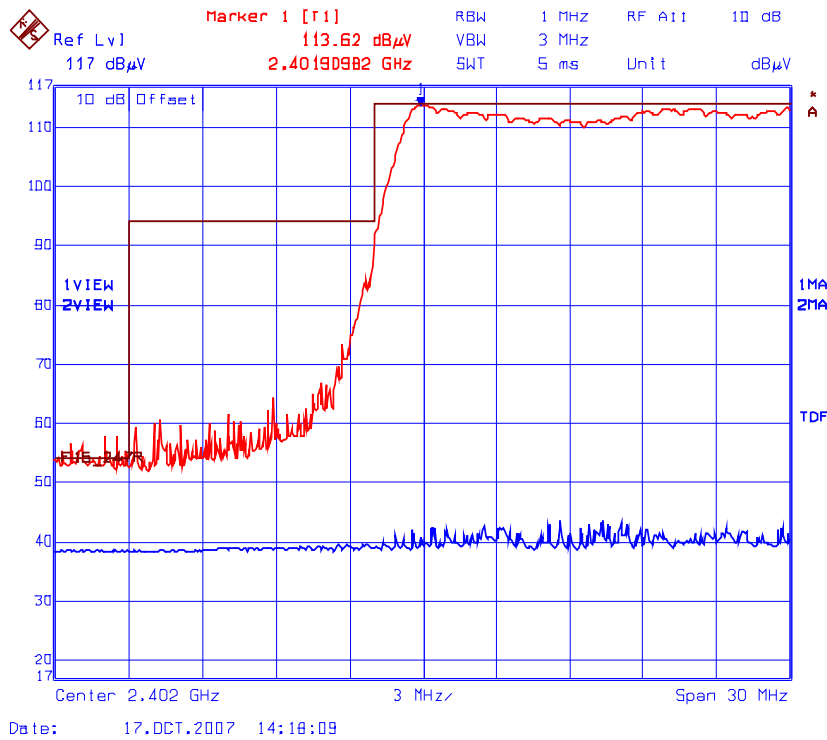
Plot 5.8.5.1.2.: Band-Edge Radiated Emissions @ 3 meters  
2402MHz, Lower Band-Edge Radiated Emissions Horizontal Polarization, Continuous  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT Left side down  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)



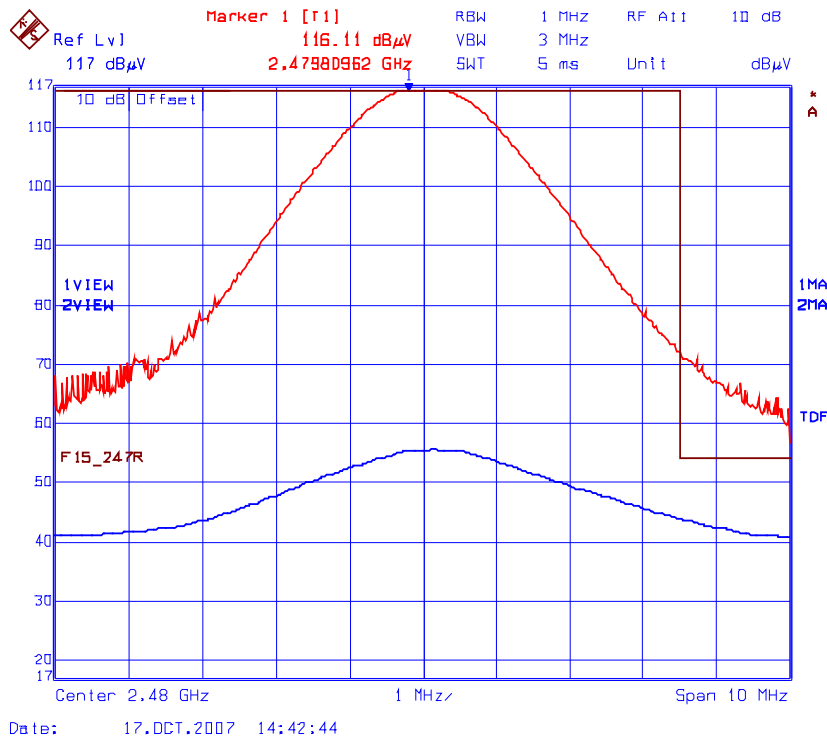
Plot 5.8.5.1.3.: Band-Edge Radiated Emissions @ 3 meters,  
2402MHz, Lower Band-Edge Radiated Emissions Vertical Polarization, Hopping  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT lay flat  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)



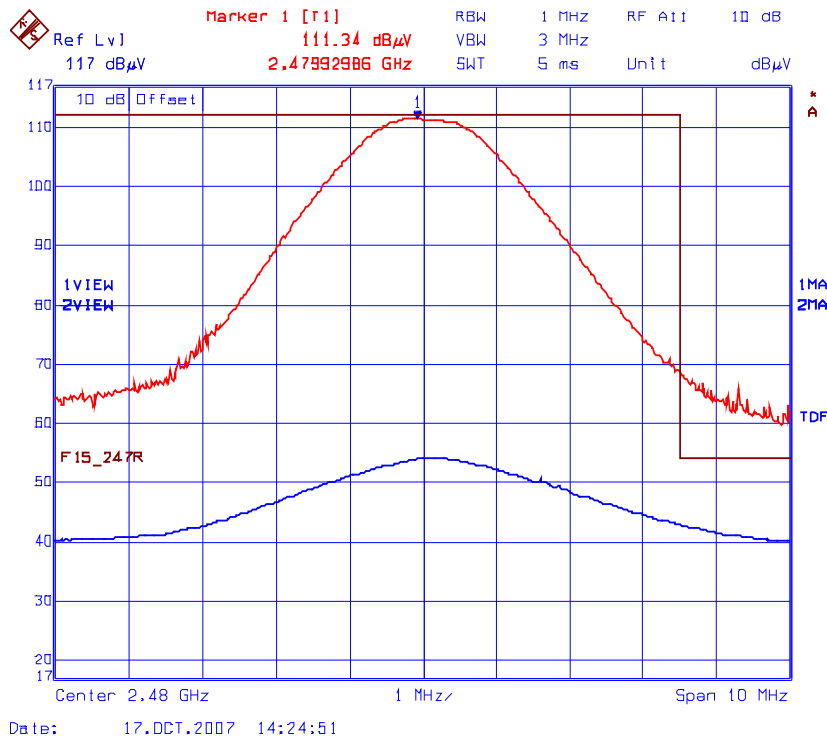
Plot 5.8.5.1.4.: Band-Edge Radiated Emissions @ 3 meters  
2402MHz, Lower Band-Edge Radiated Emissions Horizontal Polarization, Hopping  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT Right side down  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)



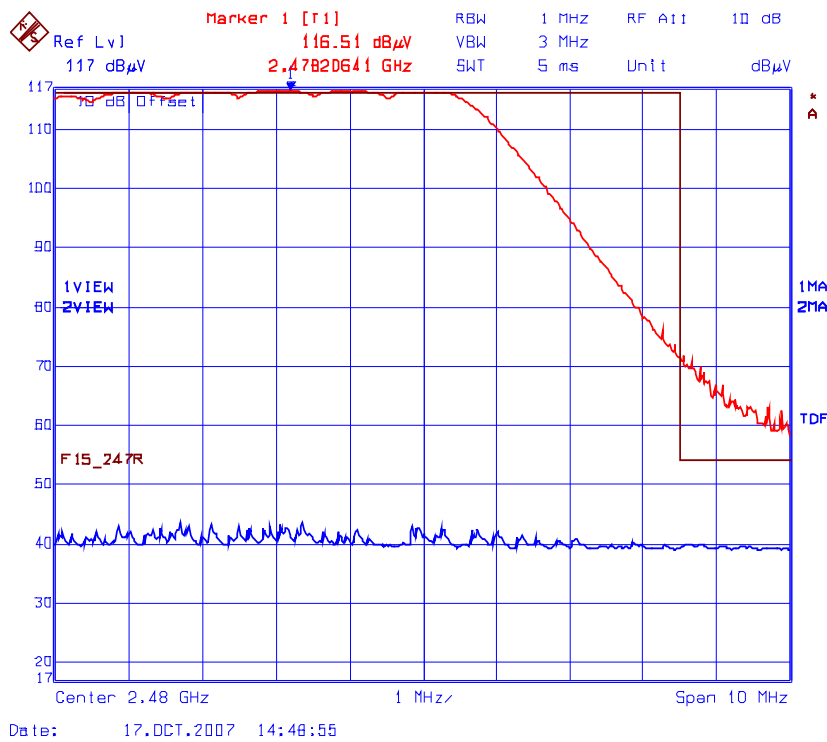
Plot 5.8.5.1.5.: Band-Edge Radiated Emissions @ 3 meters  
2480MHz, Upper Band-Edge Radiated Emissions Vertical Polarization, Continuous  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT lay flat  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)



Plot 5.8.5.1.6.: Band-Edge Radiated Emissions @ 3 meters  
2480MHz, Upper Band-Edge Radiated Emissions Horizontal Polarization, Continuous  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT Left side down  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)

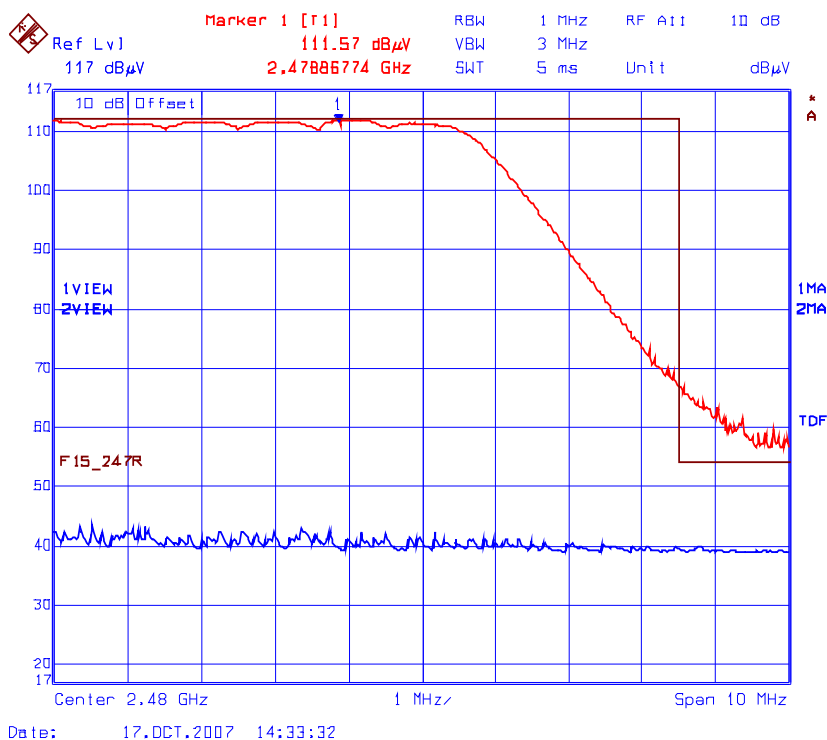


Plot 5.8.5.1.7.: Band-Edge Radiated Emissions @ 3 meters  
2480MHz, Upper Band-Edge Radiated Emissions Vertical Polarization, Hopping  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT lay flat  
Trace 1: RBW= 1MHz, VBW= 3MHz (Peak)  
Trace 2: RBW= 1MHz, VBW= 10Hz (Average)





Plot 5.8.5.1.8.: Band-Edge Radiated Emissions @ 3 meters  
2480MHz, Upper Band-Edge Radiated Emissions Horizontal Polarization, Hopping  
Packet Type: DH1, Random Modulation: SPSR (Static Pseudo), EUT Left side down  
**Trace 1:** RBW= 1MHz, VBW= 3MHz (Peak)  
**Trace 2:** RBW= 1MHz, VBW= 10Hz (Average)



**5.8.5.2. Transmitter Radiated Spurious Emissions**

The emissions were scanned from 30 MHz to 25 GHz; all signals within 20 dB below the permissible limit were recorded in the table below.

| Frequency (MHz)                        | RF Peak Level (dBµV/m) | RF Avg Level (dBµV/m) | Antenna Plane (H/V) | Limit 15.209 (dBµV/m) | Limit 15.247 (dBµV/m) | Margin (dB) | Pass/Fail |
|--|------------------------|-----------------------|---------------------|-----------------------|-----------------------|-------------|-----------|
| <b>Fundamental Frequency: 2402 MHz</b> |                        |                       |                     |                       |                       |             |           |
| 2402                                   | 116.99                 | -                     | V                   | -                     | -                     | -           | -         |
| 2402                                   | 113.77                 | -                     | H                   | -                     | -                     | -           | -         |
| 4804                                   | 62.13                  | 37.97                 | V                   | 54.0                  | 96.99                 | -16.03      | Pass*     |
| 4804                                   | 60.03                  | 37.45                 | H                   | 54.0                  | 96.99                 | -16.55      | Pass*     |
| 7206                                   | 72.71                  | 40.90                 | V                   | 54.0                  | 96.99                 | -56.06      | Pass      |
| 7206                                   | 74.36                  | 42.45                 | H                   | 54.0                  | 96.99                 | -54.54      | Pass      |
| 9608                                   | 63.54                  | 41.95                 | V                   | 54.0                  | 96.99                 | -55.04      | Pass      |
| 9608                                   | 63.58                  | 41.27                 | H                   | 54.0                  | 96.99                 | -55.72      | Pass      |
| <b>Fundamental Frequency: 2441 MHz</b> |                        |                       |                     |                       |                       |             |           |
| 2441                                   | 116.25                 | -                     | V                   | -                     | -                     | -           | -         |
| 2441                                   | 112.32                 | -                     | H                   | -                     | -                     | -           | -         |
| 4882                                   | 62.49                  | 37.87                 | V                   | 54.0                  | 96.25                 | -16.13      | Pass*     |
| 4882                                   | 62.56                  | 37.94                 | H                   | 54.0                  | 96.25                 | -16.06      | Pass*     |
| 7323                                   | 69.97                  | 40.63                 | V                   | 54.0                  | 96.25                 | -13.37      | Pass*     |
| 7323                                   | 72.41                  | 40.98                 | H                   | 54.0                  | 96.25                 | -13.02      | Pass*     |
| 9764                                   | 62.09                  | 42.76                 | V                   | 54.0                  | 96.25                 | -53.49      | Pass      |
| 9764                                   | 61.00                  | 42.60                 | H                   | 54.0                  | 96.25                 | -53.65      | Pass      |
| <b>Fundamental Frequency: 2480 MHz</b> |                        |                       |                     |                       |                       |             |           |
| 2480                                   | 116.11                 | -                     | V                   | -                     | -                     | -           | -         |
| 2480                                   | 111.34                 | -                     | H                   | -                     | -                     | -           | -         |
| 4960                                   | 71.29                  | 39.78                 | V                   | 54.0                  | 96.11                 | -14.22      | Pass*     |
| 4960                                   | 68.72                  | 39.25                 | H                   | 54.0                  | 96.11                 | -14.75      | Pass*     |
| 7440                                   | 71.69                  | 41.45                 | V                   | 54.0                  | 96.11                 | -12.55      | Pass*     |
| 7440                                   | 72.96                  | 41.70                 | H                   | 54.0                  | 96.11                 | -12.30      | Pass*     |
| 9920                                   | 61.38                  | 42.81                 | V                   | 54.0                  | 96.11                 | -53.30      | Pass      |
| 9920                                   | 63.83                  | 43.41                 | H                   | 54.0                  | 96.11                 | -52.70      | Pass      |

\* Emission in restricted bands.

## 5.9 RF Exposure Requirement [§ 15.247 (i), 1.1310 & 2.1091]

### 5.9.1. Limits

- **§ 15.247(i):** Systems operating under provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission’s guidelines. See 1.1307(b)(1).
- **§ 1.1310:-** The criteria listed in the following table shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in 1.1307(b).

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

| Frequency range (MHz)  | Electric field strength (V/m) | Magnetic field strength (A/m) | Power density (mW/cm <sup>2</sup> ) | Averaging time (minutes) |
|--|-------------------------------|-------------------------------|-------------------------------------|--------------------------|
| <b>(A) Limits for Occupational/Controlled Exposures</b>        |                               |                               |                                     |                          |
| 0.3–3.0 .....  | 614                           | 1.63                          | *(100)                              | 6                        |
| 3.0–30 .....   | 1842/f                        | 4.89/f                        | *(900/f <sup>2</sup> )              | 6                        |
| 30–300 .....   | 61.4                          | 0.163                         | 1.0                                 | 6                        |
| 300–1500 .....   | .....                         | .....                         | f/300                               | 6                        |
| 1500–100,000 .....   | .....                         | .....                         | 5                                   | 6                        |
| <b>(B) Limits for General Population/Uncontrolled Exposure</b> |                               |                               |                                     |                          |
| 0.3–1.34 .....   | 614                           | 1.63                          | *(100)                              | 30                       |
| 1.34–30 .....  | 824/f                         | 2.19/f                        | *(180/f <sup>2</sup> )              | 30                       |
| 30–300 .....   | 27.5                          | 0.073                         | 0.2                                 | 30                       |
| 300–1500 .....   | .....                         | .....                         | f/1500                              | 30                       |
| 1500–100,000 .....   | .....                         | .....                         | 1.0                                 | 30                       |

f = frequency in MHz

\* = Plane-wave equivalent power density

NOTE 1 TO TABLE 1: Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or can not exercise control over their exposure.

### 5.9.2. Method of Measurements

Refer to Sections 1.1310, 2.1091 and Public Notice DA 00-705 (March 30, 2000)

Spread spectrum transmitters operating under section 15.247 are categorically from routine environmental evaluation to demonstrating RF exposure compliance with respect to MPE and/or SAR limits. These devices are not exempted from compliance (As indicated in Section 15.247(b)(4), these transmitters are required to operate in a manner that ensures that exposure to public users and nearby persons) does not exceed the Commission’s RF exposure guidelines (see Section 1.1307 and 2.1093). Unless a device operates at substantially low power levels, with a low gain antenna(s), supporting information is generally needed to establish the various potential operating configurations and exposure conditions of a transmitter and its antenna(s) in order to determine compliance with the RF exposure guidelines.

In order to demonstrate compliance with MPE requirements (see Section 2.1091), the following information is typically needed:

- (1) Calculation that estimates the minimum separation distance (20 cm or more) between an antenna and persons required to satisfy power density limits defined for free space.
- (2) Antenna installation and device operating instructions for installers (professional/unskilled users), and the parties responsible for ensuring compliance with the RF exposure requirement

- (3) Any caution statements and/or warning labels that are necessary in order to comply with the exposure limits
- (4) Any other RF exposure related issues that may affect MPE compliance

**Calculation Method of RF Safety Distance:**

$$S = \frac{P \cdot G}{4 \cdot \pi \cdot r^2} = \frac{EIRP}{4 \cdot \pi \cdot r^2}$$

Where: P: power input to the antenna in mW  
 EIRP: Equivalent (effective) isotropic radiated power  
 S: power density mW/cm<sup>2</sup>  
 G: numeric gain of antenna relative to isotropic radiator  
 r: distance to centre of radiation in cm

For portable transmitters (see Section 2.1093), or devices designed to operate next to a person’s body, compliance is determined with respect to the SAR limit (define in the body tissues) for near-field exposure conditions. If the maximum average output power, operating condition configurations and exposure conditions are comparable to those of existing cellular and PCS phones, SAR evaluation may be required in order to determine if such a device complies with SAR limit. When SAR evaluation data is not available, and the additional supporting information cannot assure compliance, the Commission may request that an SAR evaluation be performed, as provided for in Section 1.1307(d)

**5.9.3. Test Arrangement**

Refer to Section 2.6 of this test report for test setup.

**5.9.4. Test Equipment List**

| Test Instruments                   | Manufacturer    | Model No. | Serial No. | Frequency Range  |
|------------------------------------|-----------------|-----------|------------|------------------|
| Spectrum Analyzer/<br>EMI Receiver | Rohde & Schwarz | FSEK30    | 100077     | 20 Hz – 40 GHz   |
| Amplifier                          | Hewlett Packard | 8449B     | 3008A00769 | 1 GHz – 26.5 GHz |
| Horn Antenna                       | EMCO            | 3155      | 9701-5061  | 1 GHz – 18 GHz   |
| Biconilog Antenna                  | EMCO            | 3143      | 1029       | 20 MHz – 2 GHz   |

5.9.5. Test Data

| Evaluation of RF Exposure Compliance Requirements  |   |
|--|---|
| RF Exposure Requirements   | Compliance with FCC Rules   |
| Minimum calculated separation distance between antenna and persons required: <b>*2.45 cm</b>   | Manufacturer' instruction for separation distance between antenna and persons required: <b>20 cm.</b>   |
| Antenna installation and device operating instructions for installers (professional/unskilled users), and the parties responsible for ensuring compliance with the RF exposure requirement | Antenna installation and device operating instructions shall be provided to installers to maintain and ensure compliance with RF exposure requirements. |
| Caution statements and/or warning labels that are necessary in order to comply with the exposure limits  | Refer to User's Manual for RF Exposure Information.   |
| Any other RF exposure related issues that may affect MPE compliance  | None.   |

\*The minimum separation distance between the antenna and bodies of users are calculated using the following formula:

**RF EXPOSURE DISTANCE LIMITS**

$$r = \sqrt{\frac{P \cdot G}{4 \cdot \pi \cdot S}} = \sqrt{\frac{EIRP}{4 \cdot \pi \cdot S}}$$

(S<sub>Limit</sub>) = 1.0 mW/cm<sup>2</sup>

(Maximum EIRP Measured) = 18.79 dBm ≈ 10<sup>1.879</sup> = 75.68 mW

(Minimum Safe Distance, r) =  $\sqrt{\frac{EIRP}{4 \cdot \pi \cdot S}} = \sqrt{\frac{75.68}{4 \cdot \pi \cdot 1.0}} \approx 2.45cm$

## EXHIBIT 6 MEASUREMENT UNCERTAINTY

The measurement uncertainties stated were calculated in accordance with the requirements of NIST Technical Note 1297 and NIS 81 (1994)

### 6.1 LINE CONDUCTED EMISSION MEASUREMENT UNCERTAINTY

| CONTRIBUTION<br>(Line Conducted)  | PROBABILITY<br>DISTRIBUTION | UNCERTAINTY (dB) |             |
|---|-----------------------------|------------------|-------------|
|   |                             | 9-150 kHz        | 0.15-30 MHz |
| EMI Receiver specification  | Rectangular                 | $\pm 1.5$        | $\pm 1.5$   |
| LISN coupling specification   | Rectangular                 | $\pm 1.5$        | $\pm 1.5$   |
| Cable and Input Transient Limiter calibration   | Normal (k=2)                | $\pm 0.3$        | $\pm 0.5$   |
| Mismatch: Receiver VRC $\Gamma_1 = 0.03$<br>LISN VRC $\Gamma_R = 0.8(9 \text{ kHz}) 0.2 (30 \text{ MHz})$<br>Uncertainty limits $20\text{Log}(1 \pm \Gamma_1 \Gamma_R)$ | U-Shaped                    | $\pm 0.2$        | $\pm 0.3$   |
| System repeatability  | Std. deviation              | $\pm 0.2$        | $\pm 0.05$  |
| Repeatability of EUT  | --                          | --               | --          |
| Combined standard uncertainty   | Normal                      | $\pm 1.25$       | $\pm 1.30$  |
| Expanded uncertainty U  | Normal (k=2)                | $\pm 2.50$       | $\pm 2.60$  |

Sample Calculation for Measurement Accuracy in 450 kHz to 30 MHz Band:

$$u_c(y) = \sqrt{\sum_{i=1}^m u_i^2(y)} = \pm \sqrt{(1.5^2 + 1.5^2)/3 + (0.5/2)^2 + (0.05/2)^2 + 0.35^2} = \pm 1.30 \text{ dB}$$

$$U = 2u_c(y) = \pm 2.6 \text{ dB}$$

## 6.2 RADIATED EMISSION MEASUREMENT UNCERTAINTY

| CONTRIBUTION<br>(Radiated Emissions)  | PROBABILITY<br>DISTRIBUTION | UNCERTAINTY (+ dB) |               |
|---|-----------------------------|--------------------|---------------|
|   |                             | 3 m                | 10 m          |
| Antenna Factor Calibration  | Normal (k=2)                | $\pm 1.0$          | $\pm 1.0$     |
| Cable Loss Calibration  | Normal (k=2)                | $\pm 0.3$          | $\pm 0.5$     |
| EMI Receiver specification  | Rectangular                 | $\pm 1.5$          | $\pm 1.5$     |
| Antenna Directivity   | Rectangular                 | +0.5               | +0.5          |
| Antenna factor variation with height  | Rectangular                 | $\pm 2.0$          | $\pm 0.5$     |
| Antenna phase center variation  | Rectangular                 | 0.0                | $\pm 0.2$     |
| Antenna factor frequency interpolation  | Rectangular                 | $\pm 0.25$         | $\pm 0.25$    |
| Measurement distance variation  | Rectangular                 | $\pm 0.6$          | $\pm 0.4$     |
| Site imperfections  | Rectangular                 | $\pm 2.0$          | $\pm 2.0$     |
| Mismatch: Receiver VRC $\Gamma_1 = 0.2$<br>Antenna VRC $\Gamma_R = 0.67(Bi) 0.3 (Lp)$<br>Uncertainty limits $20\text{Log}(1 \pm \Gamma_1 \Gamma_R)$ | U-Shaped                    | +1.1<br>-1.25      | $\pm 0.5$     |
| System repeatability  | Std. Deviation              | $\pm 0.5$          | $\pm 0.5$     |
| Repeatability of EUT  |                             | -                  | -             |
| Combined standard uncertainty   | Normal                      | +2.19 / -2.21      | +1.74 / -1.72 |
| Expanded uncertainty U  | Normal (k=2)                | +4.38 / -4.42      | +3.48 / -3.44 |

Calculation for maximum uncertainty when 3m biconical antenna including a factor of k = 2 is used:

$$U = 2u_c(y) = 2x(+2.19) = +4.38 \text{ dB} \quad \text{And} \quad U = 2u_c(y) = 2x(-2.21) = -4.42 \text{ dB}$$