



FCC PART 15, SUBPART C
ISED RSS-210, ISSUE 9, AUGUST 2016
TEST AND MEASUREMENT REPORT

For

South Pacific Electronics Ltd

P.O. Box 9417, Nadi Airport, Nadi, Fiji Islands

FCC ID: OHKMCT915D
IC: 3367A-MCT915D

Report Type: Original Report	Product Type: Hand Held Transmitter
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Report Number: R1805319-249	
Report Date: 2019-05-14	
Reviewed By: Frank Wang RF Engineer	
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Note: This test report was prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This test report **shall not** be used by the customer to claim product certification, approval, or endorsement by A2LA or any agency of the United States Government or any foreign government.

- * This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "*"
- ‡ The customer issued a Declaration Of Similarity, which is included in this test report for reference purposes only. The validity and applicability of the Declaration of Similarity is the sole responsibility of the customer. Please refer to Appendix C (Informative) of this test report which contains the customer's Declaration of Similarity.

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1805319-249	Original Report	2019-05-14

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *South Pacific Electronics Ltd.* and their product model: *MCT91516, MCT91512, MCT91508 (FCC ID: OHKMCT915D, IC: 3367A-MCT915D)* or the “EUT” as referred to in this report. It is a multi-code technology remote.

Note: The series product model MCT91512, MCT91508 are electrically identical with tested model MCT91516, we selected MCT91516 for fully testing. The differences between them were explained in the DOS letter.

1.2 Mechanical Description of EUT

The EUT measures approximately 125 mm (L) x 65 mm (W) x 25 mm (H) and weighs approximately 0.15 kg.

The test data gathered are from typical production sample, serial number: R1805319-01 assigned by BACL.

1.3 Objective

This report is prepared on behalf of *South Pacific Electronics Ltd.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISED RSS-210 Issue 9, AUG 2016.

The objective is to determine compliance with FCC Part 15.249 and ISED RSS-210 rules for AC Conducted Emissions, Antenna Requirements, Occupied Bandwidth, and Radiated Spurious Emissions.

1.4 Related Submittal(s)/Grant(s)

N/A

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03) to certify

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile and Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime and Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes and Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers

- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- - Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- - Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- - Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- - European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- - Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA)
 - APEC Tel MRA -Phase I & Phase II
- - Israel – US-Israel MRA Phase I
- - Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- - Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- - Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- - USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- - Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

No software was used for testing.

2.3 Equipment Modifications

N/A

2.4 Local Support Equipment

No local support equipment was used for testing.

2.5 Support Equipment

No support equipment was used for testing.

2.6 Interface Ports and Cabling

No interface ports and cabling were used for testing.

3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISED Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §8.3	Antenna Requirement	Compliant
FCC §15.207 IC RSS-Gen §8.8	AC Line Conducted Emissions	Not Applicable*
FCC §2.1053, §15.205, §15.209, §15.249 (a) ISED RSS-210	Radiated Spurious Emissions	Compliant
FCC §15.215 ISED RSS-Gen §6.6	Emission Bandwidth	Compliant

*: EUT is battery powered, the AC line Conducted Emissions is not required.

4 FCC §15.203 & ISED RSS-Gen §8.3 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

According to ISED RSS-Gen §8.3: Transmitter Antenna

The applicant for equipment certification, as per RSP-100, must provide a list of all antenna types that may be used with the license-exempt transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna.

License-exempt transmitters that have received equipment certification may operate with different types of antennas. However, it is not permissible to exceed the maximum equivalent isotropically radiated power (e.i.r.p.) limits specified in the applicable standard (RSS) for the license-exempt apparatus.

Testing shall be performed using the highest gain antenna of each combination of license-exempt transmitter and antenna type, with the transmitter output power set at the maximum level. 9 When a measurement at the antenna connector is used to determine RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna manufacturer.

User manuals for transmitters equipped with detachable antennas shall also contain the following notice in a conspicuous location:

This radio transmitter (identify the device by certification number) has been approved by Industry Canada to operate with the antenna types listed below with the maximum permissible gain indicated. Antenna types not included in this list, having a gain greater than the maximum gain indicated for that type, are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types approved for use with the transmitter, indicating the maximum permissible antenna gain (in dBi).

4.2 Antenna Description

The antenna used by the EUT is a PCB antenna.

5 FCC §15.209, §15.249(a) & ISSED RSS-210 - Spurious Radiated Emissions

5.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3332 – 3339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	33458 – 3358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/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.

As per FCC §15.249(a) and RSS-210 Annex 2 section A2.9: Except as provided in paragraph (b) of this section, the field strength of emissions from intentional radiators operated within these frequency bands shall comply with the following:

Frequency (MHz)	Field Strength of Fundamental (millivolts/meter)	Field Strength of Harmonics (microvolts/meter)
902-928	50	500
2400-2483.5	50	500
5725-5875	50	500
24000-24250	250	2500

5.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was FCC 15 Subpart C limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

5.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1/T Hz / Sweep = Auto

5.4 Corrected Amplitude & Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

5.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Agilent	Analyzer, Spectrum	E4446A	US44300386	2018-06-01	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 years
EMCO	Antenna, Horn	3115	9511-4627	2018-03-28	2 years
Agilent	Amplifier, Pre	8449D	2944A10187	2018-04-02	1 year
Insulated Wire INC	2.92mm (M) X2, 1501 Armor Neoprene, 396"	KPS-1501AN- 3960-KPS	DC 1807	2018-03-13	1 year
-	SMA cable	-	C0002	Each time ¹	N/A
-	N-Type Cable	-	C00012	Each time ¹	N/A
-	N-Type Cable	-	C00014	Each time ¹	N/A
HP	Pre-Amplifier	8449B	3147A00400	2018-02-02	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

*Note*¹: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.*

5.6 Test Environmental Conditions

Temperature:	20-22 °C
Relative Humidity:	42-50 %
ATM Pressure:	102.7 kPa

The testing was performed by Harry Zhao on 2018-11-19 and 2018-11-26 in 5m chamber 3.

5.7 Summary of Test Results

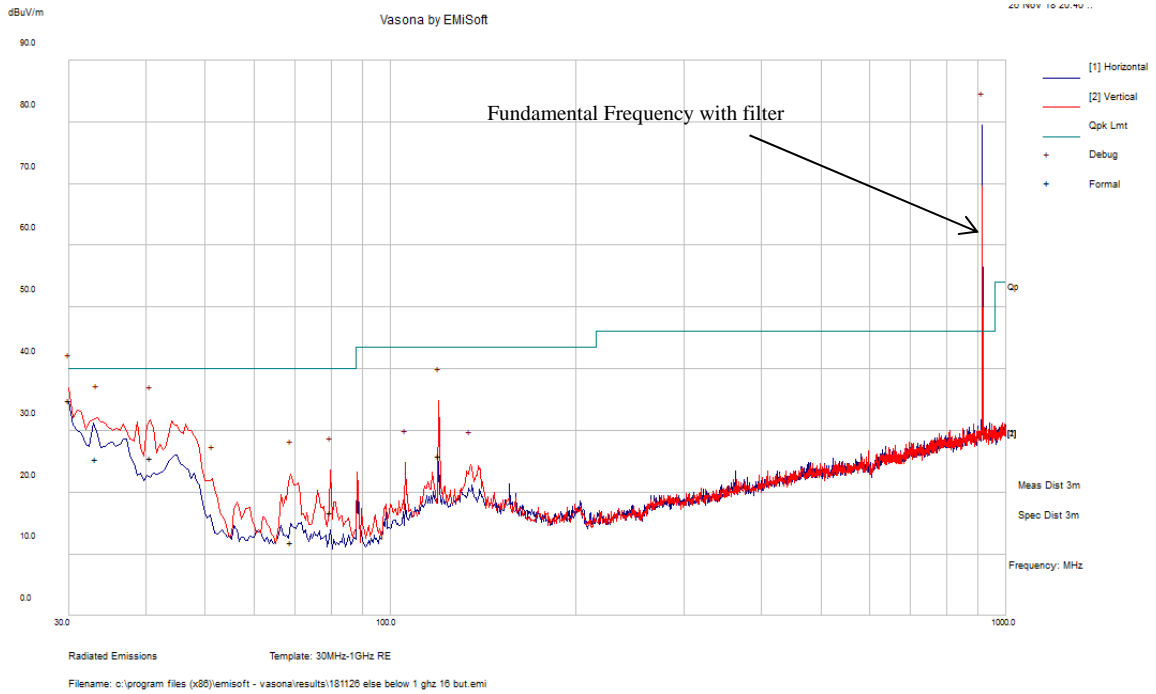
According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISED RSS-210 standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting		
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)
-1.10	3683.234	Horizontal

Please refer to the following table and plots for specific test result details

5.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz Worst Case on Low Channel (915.27788 MHz), measured at 3 meters



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
30	34.88	100	V	64	40	-5.12	QP
33.26875	25.35	102	V	82	40	-14.65	QP
40.71625	25.51	131	V	61	40	-14.49	QP
119.9678	25.91	100	V	148	43.5	-17.59	QP
79.98975	16.67	120	V	187	40	-23.33	QP
68.9685	11.89	217	V	335	40	-28.11	QP

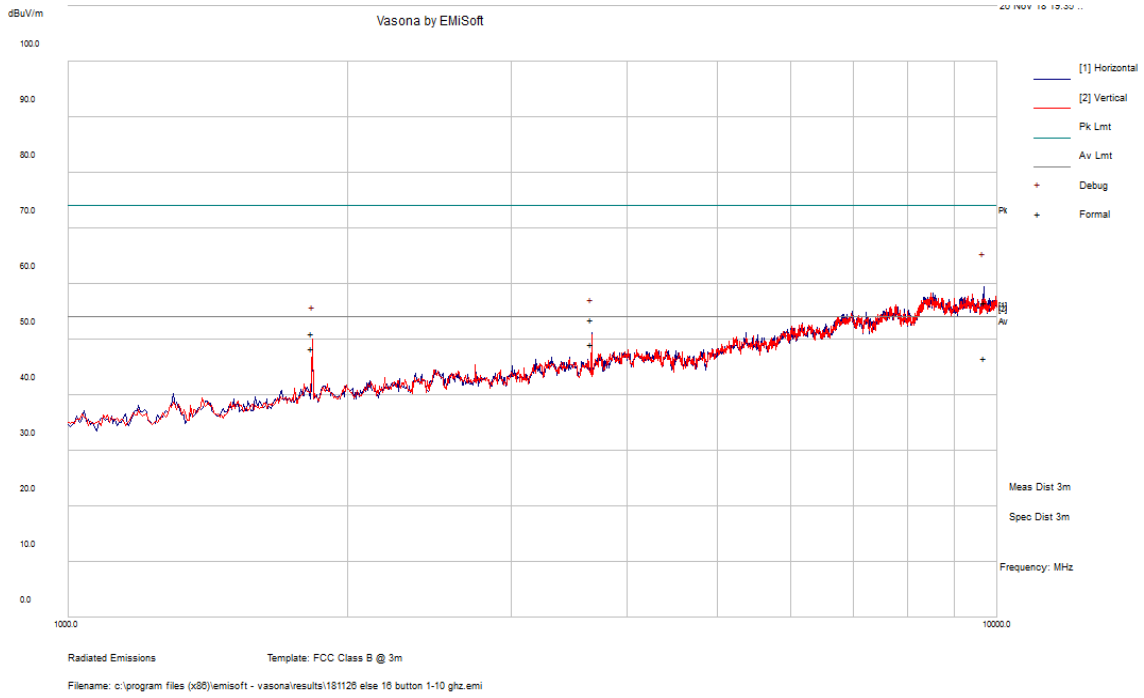
2) 900 MHz –25 GHz Measured at 3 meters

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
915.2778 MHz											
915.2779	78.16	238	100	H	29.60	2.33	20.449	89.64	114.00	-24.36	PK
915.2779	77.85	238	100	H	29.60	2.33	20.449	89.33	94.00	-4.67	AV
915.2779	68.46	165	166	V	29.60	2.33	20.449	79.94	114.00	-34.06	PK
915.2779	68.17	165	166	V	29.60	2.33	20.449	79.65	94.00	-14.35	AV
902	28.09	238	100	H	29.60	2.33	20.449	39.57	74.00	-34.43	PK
902	18.37	238	100	H	29.60	2.33	20.449	29.85	54.00	-24.15	AV
902	28.39	165	166	V	29.60	2.33	20.449	39.87	74.00	-34.13	PK
902	18.43	165	166	V	29.60	2.33	20.449	29.91	54.00	-24.09	AV
1830.556	53.32	286	221	H	27.28	6.59	35.99	51.20	74.00	-22.80	PK
1830.556	50.55	286	221	H	27.28	6.59	35.99	48.43	54.00	-5.57	AV
1830.556	54.56	335	297	V	27.28	6.59	35.99	52.44	74.00	-21.56	PK
1830.556	50.83	335	297	V	27.28	6.59	35.99	48.71	54.00	-5.29	AV
2745.834	49.63	236	152	H	29.20	6.05	35.87	49.01	74.00	-24.99	PK
2745.834	44.17	236	152	H	29.20	6.05	35.87	43.55	54.00	-10.45	AV
2745.834	49.78	319	175	V	29.14	6.05	35.87	49.10	74.00	-24.90	PK
2745.834	44.38	319	175	V	29.14	6.05	35.87	43.70	54.00	-10.30	AV
3661.112	46.49	87	300	H	31.85	6.79	34.77	50.36	74.00	-23.64	PK
3661.112	40.52	87	300	H	31.85	6.79	34.77	44.39	54.00	-9.61	AV
3661.112	47.74	148	100	V	31.79	6.79	34.77	51.55	74.00	-22.45	PK
3661.112	40.65	148	100	V	31.79	6.79	34.77	44.46	54.00	-9.54	AV
4576.389	46.22	231	273	H	32.29	8.02	34.95	51.58	74.00	-22.43	PK
4576.389	38.16	231	273	H	32.29	8.02	34.95	43.52	54.00	-10.49	AV
4576.389	45.96	228	100	V	32.24	8.02	34.95	51.27	74.00	-22.73	PK
4576.389	39.14	228	100	V	32.24	8.02	34.95	44.45	54.00	-9.55	AV

Frequency (MHz)	S.A. Reading (dB μ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB μ V/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB μ V/m)	Margin (dB)	
920.8084 MHz											
920.8084	77.29	249	100	H	29.60	2.33	20.449	88.77	114.00	-25.23	PK
920.8084	76.94	249	100	H	29.60	2.33	20.449	88.42	94.00	-5.58	AV
920.8084	68.05	302	100	V	29.60	2.33	20.449	79.53	114.00	-34.47	PK
920.8084	67.95	302	100	V	29.60	2.33	20.449	79.43	94.00	-14.57	AV
1841.617	53.39	295	205	H	27.28	6.56	35.86	51.37	74.00	-22.63	PK
1841.617	50.37	295	205	H	27.28	6.56	35.86	48.35	54.00	-5.65	AV
1841.617	55.45	50	189	V	27.28	6.56	35.86	53.43	74.00	-20.57	PK
1841.617	53.19	50	189	V	27.28	6.56	35.86	51.17	54.00	-2.83	AV
2762.425	50.73	242	175	H	29.20	6.65	35.71	50.87	74.00	-23.13	PK
2762.425	45.06	242	175	H	29.20	6.65	35.71	45.20	54.00	-8.80	AV
2762.425	50.18	328	194	V	29.14	6.65	35.71	50.26	74.00	-23.74	PK
2762.425	44.32	328	194	V	29.14	6.65	35.71	44.40	54.00	-9.60	AV
3683.234	52.03	83	100	H	32.24	6.17	35.21	55.23	74.00	-18.77	PK
3683.234	49.70	83	100	H	32.24	6.17	35.21	52.90	54.00	-1.10	AV
3683.234	50.62	146	100	V	32.14	6.17	35.21	53.72	74.00	-20.28	PK
3683.234	45.98	146	100	V	32.14	6.17	35.21	49.08	54.00	-4.92	AV
4604.042	46.19	234	100	H	32.29	7.26	34.92	50.82	74.00	-23.19	PK
4604.042	38.50	234	100	H	32.29	7.26	34.92	43.13	54.00	-10.88	AV
4604.042	46.39	228	100	V	32.24	7.26	34.92	50.97	74.00	-23.03	PK
4604.042	39.29	228	100	V	32.24	7.26	34.92	43.87	54.00	-10.13	AV

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dBµV/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
926.0308 MHz											
926.0308	77.85	238	100	H	29.60	2.33	20.449	89.33	114.00	-24.67	PK
926.0308	77.60	238	100	H	29.60	2.33	20.449	89.08	94.00	-4.92	AV
926.0308	68.56	343	156	V	29.60	2.33	20.449	80.04	114.00	-33.96	PK
926.0308	68.43	343	156	V	29.60	2.33	20.449	79.91	94.00	-14.09	AV
928	26.43	238	100	H	29.60	2.33	20.449	37.91	74.00	-36.09	PK
928	18.71	238	100	H	29.60	2.33	20.449	30.19	54.00	-23.81	AV
928	27.83	343	156	V	29.60	2.33	20.449	39.31	74.00	-34.69	PK
928	18.44	343	156	V	29.60	2.33	20.449	29.92	54.00	-24.08	AV
1852.062	55.35	281	148	H	27.28	6.27	36.24	52.66	74.00	-21.34	PK
1852.062	52.41	281	148	H	27.28	6.27	36.24	49.72	54.00	-4.28	AV
1852.062	56.38	63	293	V	27.28	6.27	36.24	53.69	74.00	-20.31	PK
1852.062	53.72	63	293	V	27.28	6.27	36.24	51.03	54.00	-2.97	AV
2778.092	50.45	231	217	H	29.26	6.29	35.08	50.92	74.00	-23.08	PK
2778.092	44.32	231	217	H	29.26	6.29	35.08	44.79	54.00	-9.21	AV
2778.092	49.54	328	218	V	29.22	6.29	35.08	49.97	74.00	-24.03	PK
2778.092	43.13	328	218	V	29.22	6.29	35.08	43.56	54.00	-10.44	AV
3704.123	53.22	129	263	H	32.24	6.41	35.04	56.83	74.00	-17.17	PK
3704.123	48.34	129	263	H	32.24	6.41	35.04	51.95	54.00	-2.05	AV
3704.123	51.66	145	100	V	32.14	6.41	35.04	55.17	74.00	-18.83	PK
3704.123	48.24	145	100	V	32.14	6.41	35.04	51.75	54.00	-2.25	AV
4630.154	46.45	227	100	H	32.37	7.83	35.44	51.21	74.00	-22.79	PK
4630.154	39.31	227	100	H	32.37	7.83	35.44	44.07	54.00	-9.93	AV
4630.154	46.46	228	100	V	32.16	7.83	35.44	51.01	74.00	-22.99	PK
4630.154	38.68	228	100	V	32.16	7.83	35.44	43.23	54.00	-10.77	AV

1GHz-18GHz



6 FCC §15.215 (c) & ISED RSS-Gen §6.6 - Emission Bandwidth

6.1 Applicable Standards

As per FCC §15.215 (c),

Intentional radiators operating under the alternative provisions to the general emission limits, as contained in §§15.217 through 15.257 and in subpart E of this part, must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. In the case of intentional radiators operating under the provisions of subpart E, the emission bandwidth may span across multiple contiguous frequency bands identified in that subpart. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

As per ISED RSS-Gen §6.6,

The emission bandwidth (\times dB) is defined as the frequency range between two points, one above and one below the carrier frequency, at which the spectral density of the emission is attenuated \times dB below the maximum in-band spectral density of the modulated signal. Spectral density (power per unit bandwidth) is to be measured with a detector of resolution bandwidth in the range of 1% to 5% of the anticipated emission bandwidth, and a video bandwidth at least $3\times$ the resolution bandwidth.

When the occupied bandwidth limit is not stated in the applicable RSS or reference measurement method, the transmitted signal bandwidth shall be reported as the 99% emission bandwidth, as calculated or measured.

6.2 Measurement Procedure

The transmitter shall be operated at its maximum carrier power measured under normal test conditions.

The span of the analyzer shall be set to capture all products of the modulation process, including the emission skirts.

The resolution bandwidth (RBW) shall be in the range of 1% to 5% of the occupied bandwidth (OBW) and video bandwidth (VBW) shall be approximately $3\times$ RBW.

Note: Video averaging is not permitted.

A peak, or peak hold, may be used in place of the sampling detector as this may produce a wider bandwidth than the actual bandwidth (worst-case measurement). Use of a peak hold may be necessary to determine the occupied bandwidth if the device is not transmitting continuously.

The trace data points are recovered and are directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded.

The difference between the two recorded frequencies is the 99% occupied bandwidth.

6.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4446A	US44300386	2018-06-01	1 year
EMCO	Antenna, Horn	3115	9511-4627	2018-03-28	2 years
-	RF Cable	-	-	Each time ¹	N/A
Agilent	Amplifier, Pre	8449D	2944A10187	2018-04-02	1 year

Note¹: cable included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

6.4 Test Environmental Conditions

Temperature:	22° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Harry Zhao on 2018-11-29 in RF site.

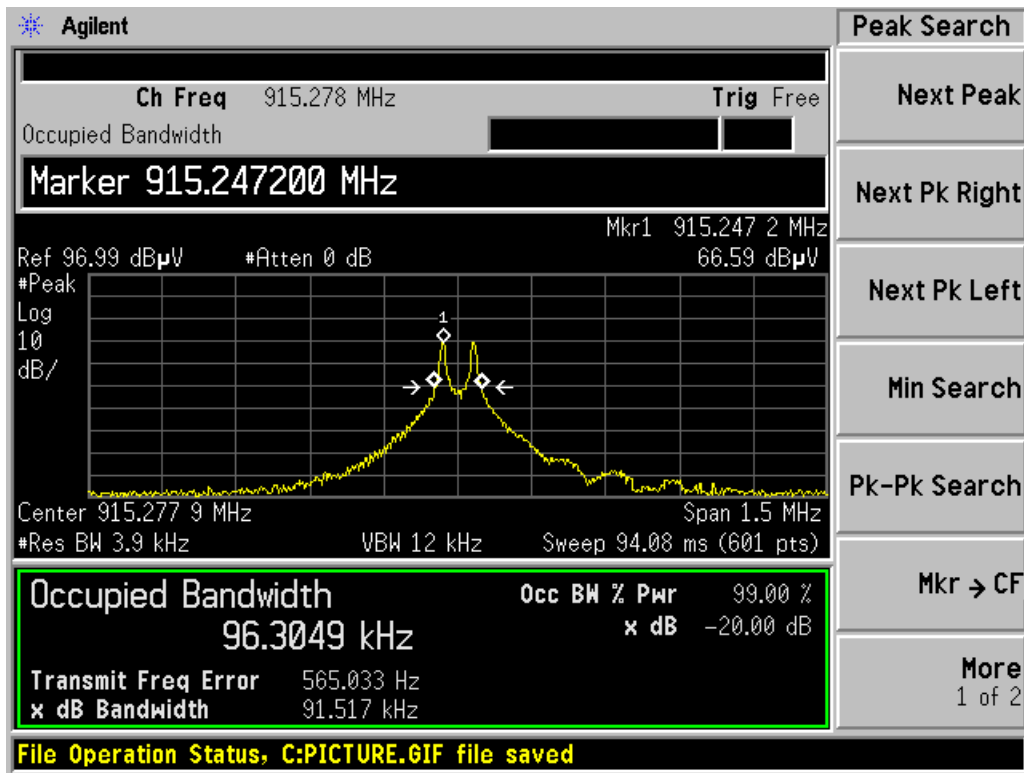
6.5 Test Results

Frequency Range(MHz)	Frequency (MHz)	99% OBW (kHz)	20 dB Bandwidth
902-928	915.27788	96.3049	Within the 902-928 MHz frequency band
	920.8084	96.0827	Within the 902-928 MHz frequency band
	926.0308	96.1794	Within the 902-928 MHz frequency band

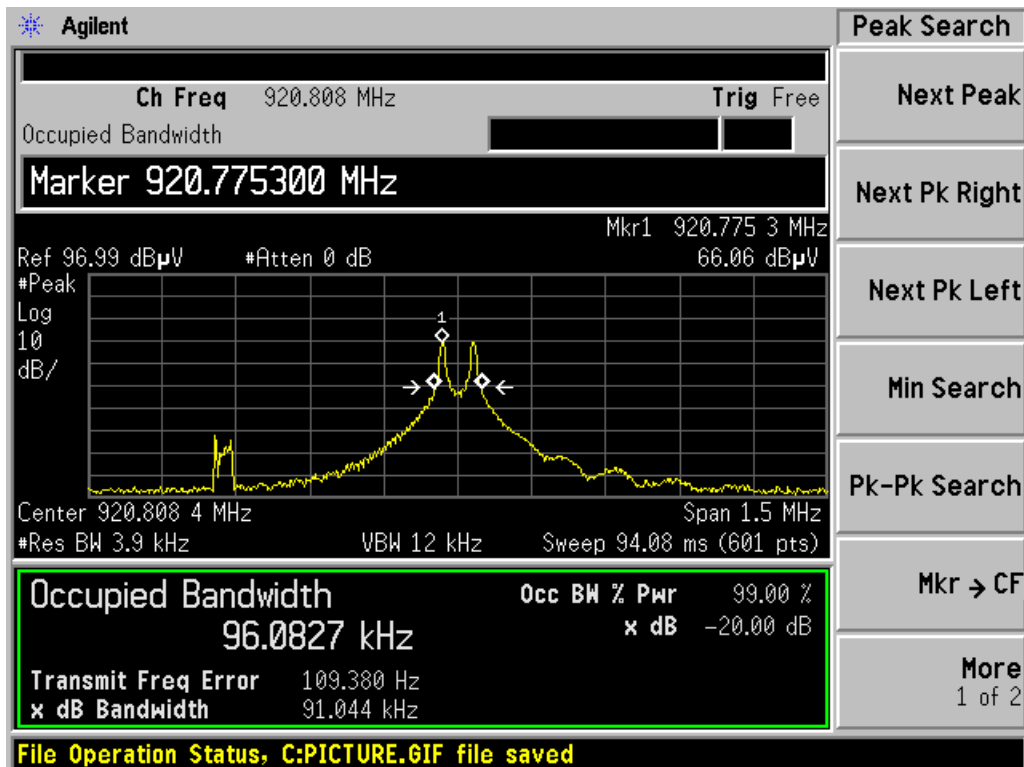
Please refer to the following plots for detailed test results.

99% Occupied Bandwidth & 20 dB bandwidth

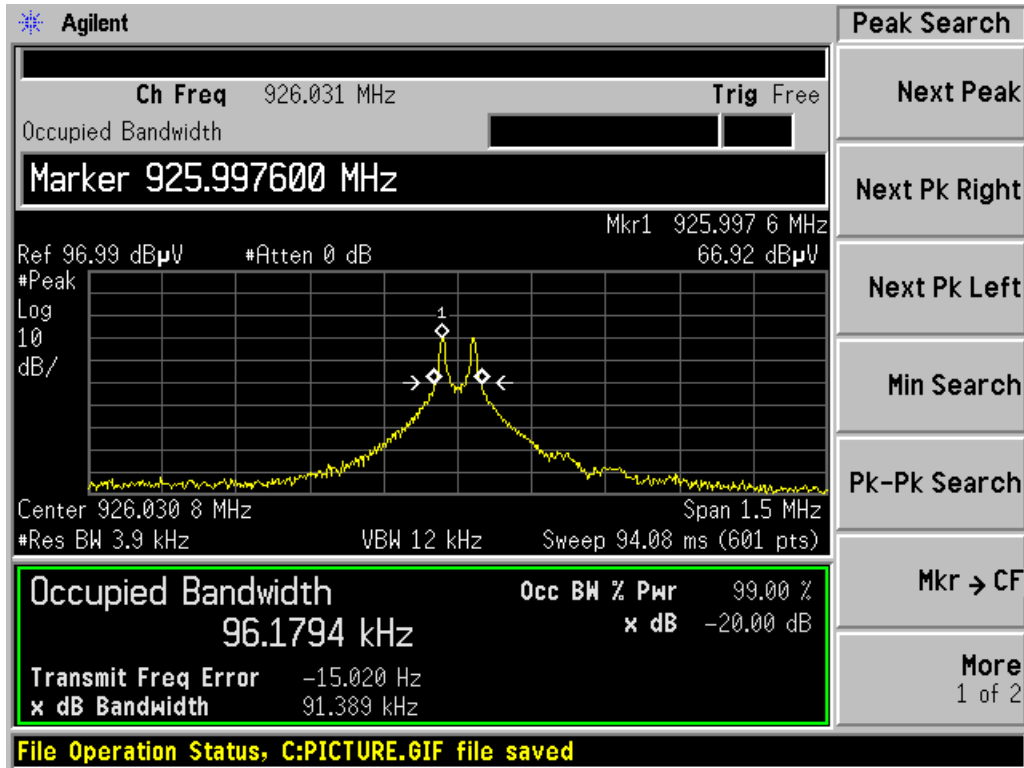
915.2778 MHz



920.8084 MHz



926.0308 MHz



7 Appendix A - FCC & IC Equipment Labeling Requirements

7.1 FCC ID Label Requirements

As per FCC §2.925,

(a) Each equipment covered in an application for equipment authorization shall bear a nameplate or label listing the following:

(1) FCC Identifier consisting of the two elements in the exact order specified in §2.926. The FCC Identifier shall be preceded by the term FCC ID in capital letters on a single line, and shall be of a type size large enough to be legible without the aid of magnification.

Example: FCC ID: XXX123

Where: XXX—Grantee Code, 123—Equipment Product Code

As per FCC §15.19,

(a) In addition to the requirements in part 2 of this chapter, a device subject to certification, or verification shall be labeled as follows:

(3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

(4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified above is required to be affixed only to the main control unit. If the EUT is integrated within another device then a label affixed to the host shall also state, "Contains FCC ID: XXXXXX"

(5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

7.2 IC Label Requirements

As per IC RSP-100 Section 3.1, the certification number shall appear as follows:

IC: XXXXXX-YYYYYYYY

Where:

- The letters "IC:" indicate that this is an Innovation, Science and Economic Development Canada's certification number, but they are not part of the certification number. XXXXXXYYYYYYYYYYYY is the ISED certification number.
- XXXXXX is the CN assigned by Innovation, Science and Economic Development Canada. Newly assigned CNs will be made up of five numeric characters (e.g. "20001") whereas existing CNs may consist of up to five numeric characters followed by an alphabetic character (e.g. "21A" or "15589J").
- YYYYYYYYYYYY is the Unique Product Number (UPN) assigned by the applicant, made up of a maximum of 11 alphanumeric characters.
- The CN and UPN are limited to capital alphabetic characters (A-Z) and numerals (0-9) only. The use of punctuation marks or other symbols, including "wildcard" characters, is not permitted.
- The HVIN may contain punctuation marks or symbols but they shall not represent any indeterminate ("wildcard") characters.

As per RSS-Gen §2.1 Equipment Labeling:

The application for equipment certification shall be submitted in accordance with Industry Canada’s Radio Standards Procedure RSP-100, Radio Equipment Certification Procedure which sets out the requirements for certification and labelling of radio apparatus. RSP-100 shall be used in conjunction with RSS-Gen and other Radio Standards Specifications (RSSs) specifically applicable to the type of radio apparatus for which certification is sought.

7.3 FCC ID & IC Label Contents and Location



TYPE : MCT91508
FCC ID : OHKMCT915D
IC : 3367A-MCT915D
R-NZ For U.S.A & Canada use only
 For New Zealand use only
Alkaline Battery Recommended
 Designed by **ELSEMA** IN AUSTRALIA

TYPE : MCT91512
FCC ID : OHKMCT915D
IC : 3367A-MCT915D
R-NZ For U.S.A & Canada use only
 For New Zealand use only
Alkaline Battery Recommended
 Designed by **ELSEMA** IN AUSTRALIA

TYPE : MCT91516
FCC ID : OHKMCT915D
IC : 3367A-MCT915D
R-NZ For U.S.A & Canada use only
 For New Zealand use only
Alkaline Battery Recommended
 Designed by **ELSEMA** IN AUSTRALIA

8 Appendix B Test Setup and EUT Photos

Please see attachments:

Annex A – EUT Test Setup Photographs

Annex B – Internal Photographs

Annex C – External Photographs

9 Appendix C (Informative) Declaration of Similarity



DECLARATION OF SIMILARITY

May 8, 2019

To:

FEDERAL COMMUNICATIONS COMMISSIONS
 Authorization and Evaluation Division
 7435 Oakland Mills Road
 Columbia, MD 21046

Innovation, Science and Economic Development Canada
 Certification and Engineering Bureau
 P.O. Box 11490, Station 'H'
 3701 Carling Ave., Building 94
 Ottawa, Ontario K2H 8S2
 Canada

Dear Sir or Madam:

We South Pacific Electronics Ltd hereby declare that product: *Hand Held Transmitter*, model: *MCT91512 (FCC ID: OHKMCT915D, IC: 3367A-MCT915D)* and *MCT91516 (FCC ID: OHKMCT915D, IC: 3367A-MCT915D)* is electrically identical with the same electromagnetic emissions and electromagnetic compatibility characteristics as model: *MCT91508 (FCC ID: OHKMCT915D, IC: 3367A-MCT915D)* tested by BACL, the results of which are featured in BACL project: *R1805319*.

A description of the differences between the tested model and those that are declared similar are as follows:

Model	Differences
MCT91508	- Test Model - Has 8 Buttons on the top
MCT91512	- Model number - Has Twelve Buttons on the top
MCT91516	- Model number - Has Sixteen Buttons on the top

Except for above, all models are electrically identical and operated the same frequency range: 915.27788 - 926.0308 MHz

Please contact me should there be need for any additional clarification or information.

Best Regards,

Richard Eigner
 Director
 P.O. Box 9417, Nadi Airport, Fiji

First Electronic Manufacturing Company in the South Pacific

10 Appendix D (Normative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 *General requirements for the competence of testing and calibration laboratories*. This laboratory also meets A2LA R222 - *Specific Requirements EPA ENERGY STAR Accreditation Program*. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 2nd day of October 2018.

President and CEO
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2020

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope
<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---