

Milwaukee Electric Tool Corp. 49-16-2123R 25915 rev2.0 11319

# **Code of Federal Regulations 47 Part 15 – Radio Frequency Devices**

Subpart C – Intentional Radiators Section 15.231 Periodic operation in the band 40.66 - 40.70 MHz and above 70 MHz

#### THE FOLLOWING MEETS THE ABOVE TEST SPECIFICATION

### FCC ID: P36-212320

Formal Name:	M18 Utility Light Remote Control
Kind of Equipment:	RF Remote Control Transmitter
Frequency Range:	433 MHz
Test Configuration:	Table top, battery operated device tested in three orthogonal positions.
Model Number(s):	49-16-2123R
Model(s) Tested:	49-16-2123R
Serial Number(s):	N/A
Date of Tests:	January 11-13, 2021
Test Conducted For:	Milwaukee Electric Tool Corp. 13135 W. Lisbon Road Brookfield, WI 53005, USA

**NOTICE**: The test report contains test data, equipment lists, photographs and/or other information regarding only the sample provided by the client for testing. This test report shall not be used to claim product approval or endorsement by any governmental, regulatory, or accrediting agency. Please see the "Description of Test Sample" page listed inside of this report.

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### SIGNATURE PAGE

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# **CERTIFICATE OF ACCREDITATION**

### **The ANSI National Accreditation Board**

Hereby attests that

#### DLS Electronic Systems, Inc. 200 E. Marquardt Drive Wheeling, IL 60090 (and satellite sites as shown on the scope)

Fulfills the requirements of

### **ISO/IEC 17025:2017**

In the field of

### TESTING

This certificate is valid only when accompanied by a current scope of accreditation document. The current scope of accreditation can be verified at <u>www.anab.org</u>.

R. Douglas Leonard Jr., VP, PILR SBU Expiry Date: 23 April 2022 Certificate Number: AT-1859



This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. 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).

# SATELLITE SITE

DLS Electronic Systems, Inc. (Oats site) 166 South Carter Genoa City, Wisconsin 53128 www.dlsemc.com



# **1.0 Summary of Test Report**

It was determined that the M18 Utility Light Remote Control, model 49-16-2123R, complies with the requirements of CFR 47 Part 15 Subpart C Section 15.231.

Sub	part	C A	pplica	ble T	`echn	ical	Rea	uiren	nents	Tested:
Sub	purt		ppnca		com	ncui	тсч	unun	ICHU5	I colcu.

Section	Description	Procedure	Note	<b>Compliant?</b>
15.231(c)	20 dB Emission Bandwidth	ANSI C63.10-2013 Section 6.9.2	1,2	Yes
15.231(a)(1)	Transmission Deactivation	ANSI C63.10-2013 Section 7.4	1	Yes
15.231(b)	Field Strength of Emissions - Fundamental and Spurious -	ANSI C63.10-2013 Section 7.6	1,2	Yes
15.35(c)	Duty Cycle Correction for Pulsed Operation	ANSI C63.10-2013 Section 7.5	1	Informative
15.31(e)	Supply Voltage Statement	N/A		Yes
15.230	Antenna Requirement Statement	N/A		Yes

Note 1: Radiated emission measurement.

Note 2: Tested in 3 orthogonal axes.

# 2.0 Introduction

On January 11-13, 2021 the M18 Utility Light Remote Control, model 49-16-2123R, as provided by Milwaukee Electric Tool Corp. was tested to the requirements of CFR 47 Part 15 Subpart C Section 15.231. To meet these requirements, the procedures contained within this report were performed by personnel of D.L.S. Electronic Systems, Inc.



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# **3.0 Test Facilities**

D.L.S. Electronic Systems, Inc. is a full-service EMC/Safety Testing Laboratory accredited to ISO 17025. ANAB Certificate and Scope can be viewed at <u>http://www.dlsemc.com/certificate</u>. Our facilities are registered with the FCC, ISED Canada, and VCCI.

#### Wisconsin Test Facility:

D.L.S. Electronic Systems, Inc. 166 S. Carter Street Genoa City, Wisconsin 53128 Wheeling Test Facility: D.L.S. Electronic Systems, Inc. 1250 Peterson Drive Wheeling, IL 60090

FCC Registration #90531

# 4.0 Description of Test Sample

### **Description:**

Remote Control for Utility Search Light - Controls light head movement and selects between spot and flood mode.

### **Type of Equipment / Frequency Range:**

DSC - periodic transmitter operating at 433.92 MHz

Hand-held / Benchtop

### **Physical Dimensions of Equipment Under Test:**

Length: 6 inches x Width: 3 inches x Height: 2 inches

#### **Power Source:**

3.0 VDC; Two AAA Batteries



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# 4.0 Description of Test Sample (continued)

### **Internal Frequencies:**

433.92 MHz

### **Transmit Frequencies Used For Test Purpose:**

433.92 MHz

### Type of Modulation(s) / Antenna Type:

FSK / Spring antenna (-1 dBi gain)



# 5.0 Test Equipment

A list of the equipment used can be found in the table below. All primary equipment was calibrated against known reference standards with a verified traceable path to NIST.

### D.L.S. Wisconsin – Radiated Emissions 30-1000 MHz – Site 3 – Test Equipment:

Description	Manufacturer	Model Number	Serial Number	Frequency Range	Cal Dates	Cal Due Dates
Receiver	Rohde & Schwarz	ESI 26	837491/010	20 Hz-26 GHz	3-31-20	3-31-21
Antenna	EMCO	3104C	0005-4892	20 MHz-200 MHz	5-28-20	5-28-22
Antenna	Electro-Metrics	LPA-25	1114	200 MHz-1 GHz	1-21-20	1-21-22
Cable	Beldin	9914	CBL-023	9 kHz-1 GHz	7-6-20	7-6-21
Cable	Beldin	9273	CBL-029	9 kHz-1 GHz	7-6-20	7-6-21
Cable	Manhattan/CDT	RG-223/U	CBL-052	9 kHz-1 GHz	7-6-20	7-6-21
Test Software	Rohde & Schwarz	ESK1	V1.7.1	N/A	N/A	N/A

### D.L.S. Wisconsin – Radiated Emissions 1-5 GHz – Site G1 – Test Equipment:

Description	Manufacturer	Model Number	Serial Number	Frequency Range	Cal Dates	Cal Due Dates
Receiver	Rohde & Schwarz	ESI 40	837808/005	20 Hz-40 GHz	4-28-20	4-28-21
Horn Antenna	EMCO	3115	115 9903-5731 1 GHz-18 GHz		1-16-20	1-16-22
Cable	Micro-Coax	UFB311A	CBL-100	30 MHz-18 GHz	5-5-20	5-5-21
High Pass Filter	Mini-Circuits	NHP-600	1 0521	600 MHz-7 GHz	6-3-20	6-3-21
Preamplifier	Miteq	AMF-7D- 01001800- 22-10P	1777990	1 GHz-18 GHz	1-5-21	1-5-22
Test Software	Rohde & Schwarz	ESK1	V1.7.1	N/A	N/A	N/A



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# 6.0 Test Arrangements

#### **Radiated Emissions Measurement Arrangement:**

All radiated emission measurements were performed at D.L.S. Electronic Systems, Inc. and set up according to ANSI C63.10-2013, unless otherwise noted. Description of procedures and measurements can be found in Section A – Measurement Data. See separate exhibit "Setup Photos" for additional photos of the test set up. See Section B for measurement uncertainty.

Unless otherwise noted, the bandwidth of the measuring receiver / analyzer used during testing is shown below.

Frequency Range	Bandwidth (-6 dB)
10 to 150 kHz	200 Hz
150 kHz to 30 MHz	9 kHz
30 MHz to 1 GHz	120 kHz
Above 1 GHz	1 MHz

# 7.0 Test Conditions

#### **Temperature and Humidity:**

67 °F at 23% RH

#### **Battery Voltage:**

3.13 Volts (2 new AAA batteries)

# 8.0 Modifications Made to EUT For Compliance

None noted at time of test.



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# 9.0 Additional Descriptions

The EUT was rotated through three orthogonal axes to find the worst-case emissions. The EUT was tested with new batteries. Each function (mode) of the transmitter was tested for worst-case duty cycle and emission levels. Emissions levels were found to be identical for each mode.

# 10.0 FCC 15.31(e) Supply Voltage Requirement statement

FCC 15.31(e) - For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage.

Compliance Statement: This device complies with the requirements of Part 15.31(e):

This device is battery operated. All tests were performed using a new (or fully charged) battery.

This device provides a constant regulated voltage to the RF circuitry regardless of supply voltage (see schematic diagrams).

This device does not provide a constant regulated voltage to the RF circuitry regardless of supply voltage. Data has been supplied in this test report that supports compliance. Details:



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# 11.0 FCC 15.203 Antenna Requirement statement

### SECTION 15.203 ANTENNA REQUIREMENT

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.... This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221.

Statement: This wireless device (Intentional Radiator) meets the requirements of FCC Part 15.203:

 $\square$  The antenna is permanently attached

The antenna has a unique coupling to the intentional radiator. Description of coupling:

This intentional radiator is professionally installed

This intentional radiator, in accordance with Section 15.31(d), must be measured at the installation site.

# 12.0 Results

Measurements were performed in accordance with ANSI C63.10-2013. Graphical and tabular data can be found in Section A at the end of this report.

# **13.0** Conclusion

The M18 Utility Light Remote Control, model 49-16-2123R, as provided from Milwaukee Electric Tool Corp., tested on January 11-13, 2021 **meets** the requirements of CFR 47 Part 15 Subpart C Section 15.231.



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# Section A – Measurement Data

# 1.0 Emission Bandwidth – 20 dB

### **Rule Part:**

Section 15.231(c)

### **Test Procedure:**

ANSI C63.10-2013, Section 6.9.2 Occupied bandwidth – relative measurement procedure

#### Limit:

Section 15.231(c): 0.25% of center frequency (433.92 MHz) = 1.084 MHz

#### **Results:**

Compliant 20 dB bandwidth: **113.03 kHz** 

### **Sample Equation(s):**

None

### Notes:

This was a radiated emissions measurement. The maximum field strength of the emission was determined, and the bandwidth was measured from the points 20 dB down from the modulated carrier.



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#### Section A

Test Date:	01-11-2021
Company:	Milwaukee Tool
EUT:	Remote Control for Truck Light
Test:	20 dB Bandwidth
Operator:	Craig B

#### Comment: SPAN 2 to 5 times occupied bandwidth RBW between 1% and 5% of occupied bandwidth Limit: 0.25% of center frequency (433.92 MHz) = 1.08 MHz



### 20 dB Bandwidth = 113.03 kHz



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# 2.0 Transmission Deactivation

### **Rule Part:**

Section 15.231(a)(1)

#### **Test Procedure:**

ANSI C63.10-2013, Section 7.4 Procedure for determining compliance of unlicensed wireless devices having periodic operation

#### Limit:

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

#### **Results:**

Compliant Deactivation time: **90.18 ms** 

#### **Sample Equation(s):**

None

#### Notes:

Transmission deactivates within five seconds of switch being released. Each switch (mode) was tested. Worst-case is reported.



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#### Section A

Test Date:	01-11-2021
Company:	Milwaukee Tool
EUT:	Remote Control for Truck Light
Test:	Dwell Time
Operator:	Craig B

Comment: A manually operated transmitter shall cease transmission within 5 seconds after being released.

#### Deactivation (Dwell) Time = 90.18 ms





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### Section A

# **3.0** Field Strength of Emissions – Fundamental and Spurious

### **Rule Part:**

Section 15.231(b) including section 15.205 (restricted bands)

#### **Test Procedure:**

ANSI C63.10-2013, Section 7.6 Determination of spurious and fundamental emissions

#### Limit:

Limit table if section 15.231(b) {linear interpolation} Limit is based on the average value of the measured emission. Fundamental limit (F)  $\mu$ V/m at 3 meters: 41.6667(F) – 7083.3333 The maximum permitted unwanted emission level is 20 dB below the maximum permitted fundamental level.

There is also a limit on peak radio frequency emissions that is 20 dB above the maximum permitted average emission limit.

#### **Results:**

Compliant

Sample Equation(s):	Y = MX + C; (C = Y - MX); M = Y2 - Y1 / X2 - X1
Amplitude (µV/m):	Y1 = 3750
	Y2 = 12500
Frequency (MHz):	X1 = 260
	X2 = 470
Solve for 433.92 MH	Iz: $M = (12500 - 3750) / (470 - 260) = 41.66667$
	$C = 3750 - (41.66667 \times 260) = -7083.33$
	$Y = (41.66667 \text{ x } 433.92) + (-7083.33) = 10996.67 \ \mu\text{V/m}$
20 x log (10996.67) =	= 80.82 dBµV/m at 3 meters (Average emission limit)

Limit on Peak emission =  $80.82 \text{ dB}\mu\text{V/m} + 20 \text{ dB} = 100.82 \text{ dB}\mu\text{V/m}$ 

#### Notes:

The emissions were measured of the fundamental and spurious at a distance of 3 meters between the EUT and the measuring antenna. The EUT was rotated in 3 orthogonal axes and the highest emissions were recorded. Compliance is determined by comparing peak data, minus duty cycle correction factor, to the average limit.



166 South Carter, Genoa City, WI 53128

Milwaukee Electric Tool Corp. Model Tested: 49-16-2123R Report Number: 25915 rev2.0 Project Number: 11319

Section A

#### Radiated Fundamental and Spurious Emissions - 30 MHz to 1000 MHz Tested at a 3 Meter Distance

Company:

EUT: Remote control for Truck Light	ıt
Manufacturer: Milwaukee Tool	
<b>Operating Condition:</b> 67 deg F; 23% R.H.	
Test Site: Site 3	
Operator: cbrandt	
Test Specification: FCC Part 15.231(b)	
Comment: Battery Operated	
<b>Date:</b> 01-13-2021	

All other emissions at least 20 dB under the limit. Notes: All measurements were made with a peak detector.

Frequency	Measurement	Antenna	Level	Antenna	System	Total	Duty	Final	Limit	Margin	Antenna	EUT	
(MU <sub>2</sub> )	Typo	Polarization	(dBuV)	Factor	Loss	Level	Cycle	Corrected	(dBuV/m)	(dR)	Height	Angle	Comment
(IVIIIZ)	туре	rolalization	(uBu v)	(dB/m)	(dB)	(dBuV/m)	Correction	(dBuV/m)	(uBu v/III)	(ub)	(m)	(deg)	
	Max Peak	Vertical	64.82	16 50	68	88 12	0	88.12	100.82	12.7	1.0	255	F
433.920	Average	ventical	04.02	10.50	0.0	00.12	18.06	70.06	80.82	10.8	1.0	233	1
	Max Peak	Horizontal	64.30	16.50	6.8	87.60	0	87.60	100.82	13.2	1.4	242	F
	Average						18.06	69.54	80.82	11.3	1.4	342	
	Max Peak	Vartical	29.62	22.10	10.1	61.82	0	61.82	80.82	19.0	1.0	280	Н
967 940	Average	Vertical	20.02	25.10	10.1		18.06	43.76	60.82	17.1	1.0		
807.840	Max Peak	Horizontal	26.14	22.10	10.1	50.24	0	59.34	80.82	21.5	1.0	115	Н
	Average	Horizontai	20.14	23.10	10.1	39.34	18.06	41.28	60.82	19.5	1.0		

Legend: H=Harmonic; RB=Restricted Band; F=Fundamental Total Level = Level + Antenna Factor + System Loss

Final Corrected = Total Level - Duty Cycle Correction

Margin = Limit - Final Corrected



166 South Carter, Genoa City, WI 53128

Company: Model Tested: Report Number: Project Number:

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#### Section A

#### **Radiated Fundamental and Spurious Emissions – 1 GHz to 5 GHz** Tested at a 3 Meter Distance

EUT:	Remote control for Truck Light
Manufacturer:	Milwaukee Tool
Operating Condition:	72 deg F; 26% R.H.
Test Site:	Gl
Operator:	cbrandt
Test Specification:	FCC Part 15.231(b)
Comment:	Battery Operated
Date:	01-11-2021 & 01-12-21

**Notes:** All other emissions at least 20 dB under the limit. All measurements were made with a peak detector.

Frequency (MHz)	Measurement Type <u>Max Peak</u> Average	Antenna Polarization Vertical	Level (dBuV) 82.61	Antenna Factor (dB/m) 25.57	System Loss (dB) -55.7	Total Level (dBuV/m) 52.51	Duty Cycle Correction 0 18.06	Final Corrected (dBuV/m) 52.51 34.45	Limit (dBuV/m) 74.00 54.00	Margin (dB) 21.5 19.6	Antenna Height (m) 1.1	EUT Angle (deg) 207	Comment H/RB
1301.700	Max Peak Average	Horizontal	83.31	25.57	-55.7	53.21	0 18.06	53.21 35.15	74.00 54.00	20.8 18.9	1.1	171	H / RB
1725 680	Max Peak Average	Vertical	95.11	26.28	-54.7	66.71	0 18.06	66.71 48.65	80.82 60.82	14.1 12.2	2.0	130	Н
1755.080	Max Peak Average	Horizontal	96.29	26.28	-54.7	67.89	0 18.06	67.89 49.83	80.82 60.82	12.9 11.0	1.7	243	Н
2160 600	Max Peak Average	Vertical	82.64	27.62	-54.5	55.80	0 18.06	55.80 37.74	80.82 60.82	25.0 23.1	1.8	121	Н
2109.000	Max Peak A verage	Horizontal	84.16	27.62	-54.5	57.32	0 18.06	57.32 39.26	80.82 60.82	23.5 21.6	1.7	211	Н
2602.520	Max Peak Average	Vertical	80.86	28.83	-54.7	55.03	0 18.06	55.03 36.97	80.82 60.82	25.8 23.9	2.0	124	Н
2603.520	Max Peak Average	Horizontal	81.51	28.83	-54.7	55.68	0 18.06	55.68 37.62	80.82 60.82	25.1 23.2	1.7	215	Н
	Max Peak	Vertical	76.59	31.12	-55.3	52.38	0	52.38	80.82	28.4	1.6	72	Н
3471.360	Max Peak Average	Horizontal	76.83	31.12	-55.3	52.62	0 18.06	52.62 34.56	80.82 80.82 60.82	26.3 28.2 26.3	2.1	134	Н
4339 200	Max Peak Average	Vertical	90.15	32.10	-55.4	66.86	0 18.06	66.86 48.80	74.00 54.00	7.1 5.2	1.5	131	H/RB
4339.200	Max Peak A verage	Horizontal	85.59	32.10	-55.4	62.30	0 18.06	62.30 44.24	74.00 54.00	11.7 9.8	1.1	258	H / RB
								<i></i>	<b>7</b> 4 00	10.6			
4773.120	Max Peak Average	Vertical	83.00	32.83	-54.5	61.36	0 18.06	61.36 43.30	74.00 54.00	12.6 10.7	2.0	131	H/RB
	Max Peak A verage	Horizontal	83.89	32.83	-54.5	62.25	0 18.06	62.25 44.19	74.00 54.00	11.8 9.8	1.4	257	H/RB

Legend: H=Harmonic; RB=Restricted Band; F=Fundamental

Total Level = Level + Antenna Factor + System Loss

Final Corrected = Total Level - Duty Cycle Correction

Margin = Limit - Final Corrected



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Section A

# 4.0 Duty Cycle Correction

### **Rule Part:**

Section 15.35(c)

### **Test Procedure:**

ANSI C63.10-2013, Section 7.5 Procedure for determining the average value of pulsed emissions

#### Limit:

Informative

### **Results:**

Duty Cycle Correction Factor = -18.06 dB

### **Sample Equation(s):**

One complete pulse train (*T*): T = 81.76 ms ON time of one pulse: 3.406814 ms Total ON time in 81.76 ms = 3.406814 ms x 3 pulses = 10.220442 ms Duty Cycle Correction Factor = 20 Log (10.220442/81.76) = -18.06 dB

#### Notes:

Compliance is determined by comparing peak detector data, minus duty cycle correction, to the average limit.



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Test Date:	01-11-2021
Company:	Milwaukee Tool
EUT:	Remote Control for Truck Light
Test:	Duty Cycle – worst-case normal operation
Operator:	Craig B
Comment:	One complete pulse train ( <i>T</i> ): $T = 81.76$ ms
	ON time of one pulse: 3.406814 ms
	Total ON time in 81.76 ms = 3.406814 ms x 3 pulses = 10.220442 ms

**Duty Cycle Correction Factor** = 20 Log (10.220442/81.76) = -18.06 dB

<u>100 ms sweep</u>: (pulse train resulting from one press of the button; not multiple presses)





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166 South Carter, Genoa City, WI 53128 Section A

Test Date:	01-11-2021
Company:	Milwaukee Tool
EUT:	Remote Control for Truck Light
Test:	Duty Cycle – worst-case normal operation
Operator:	Craig B
Comment:	One complete pulse train (T): $T = 81.76$ ms

Comment: One complete pulse train (*T*): T = 81.76 ms ON time of one pulse: 3.406814 ms Total ON time in 81.76 ms = 3.406814 ms x 3 pulses = 10.220442 ms **Duty Cycle Correction Factor** = 20 Log (10.220442/81.76) = **-18.06 dB** 

#### ON time of one pulse:





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# **Section B – Measurement Uncertainty**

Compliance with the limits in this standard are based on the results of the compliance measurement. Our calculated measurement uncertainty including the measurement instrumentation, associated connections between the various instruments in the measurement chain, and other contributions, are provided in this section of the test report.

		Uncertainty (+/-dB)	Uncertainty (+ / - dB)	Uncertainty (+/-dB)						
Contribution	Probability Distribution	3M	3M	ЗM	ЗM	ЗM	3M	10M	10M	10M
		30- 100MHz.	100- 700MHz	700- 1000MHz.	1- 4.5Ghz	4.5 - 7Ghz	7 - 18Ghz	30- 100MHz.	100- 700MHz.	700- 1000MHz.
Combined Standard Un certainty	Normal	1.70	1.62	1.66	2.13	2.48	2.85	1.64	1.58	1.66
Expanded Uncertainty	Normal (k=2)	3.40	3.23	3.33	4.26	4.95	5.69	3.29	3.16	3.31

#### Radiated Emission 30 MHz to 18 GHz Uncertainty



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# **END OF REPORT**

<b>Revision</b> #	Date	Comments	By
1.0	01-29-2021	Initial Release	CB
2.0	04-08-2021	Moved setup photos to a separate exhibit	CB