

TEST REPORT No.: 18-1-0039301T04

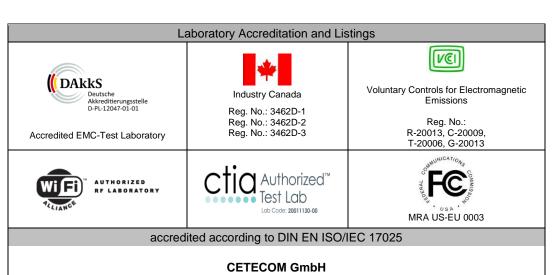
> According to: FCC Regulations Part 1.1310 Part 2.1091

> > for

### Gemalto M2M GmbH

### LTE Module Rel.13 CAT-M1 EMS31-V

FCC-ID: QIPEMS31-V



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Laboratory Accreditation and Listings



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The listed attachments are an integral part of this report.



## 1. Summary of test results

The test results apply exclusively to the test samples as presented in this Report. The CETECOM GmbH does not assume responsibility for any conclusions and generalizations taken in conjunction with other specimens or samples of the type of the item presented to tests.

The Equipment Under Test (in this report, hereinafter referred as EUT) supports radiofrequency technologies. This test report shows results for LTE (4G) technologies only. Other implemented wireless technologies were not considered within this test report.

Following tests have been performed to show compliance with applicable FCC Part 2.1091 and FCC Part 1.1310 of the FCC CFR 47 Rules.

### 1.1. Summary of tests results

RF	RF-Exposure Evaluation (separation distance user to RF-radiating element greater 20cm)					
		References & Limits		EUT	EUT	
Test cases	Port	FCC Standard	Test Limit	set-up op. mode		Result
Radio frequency radiation exposure Requirements	Cabinet	§1.1310 §2.1091	FCC: §1.1310 Table 1, Limits for General Population	1	2	Pass

Remark: Calculations based on Datasheet delivered by applicant

Dipl.-Ing. Rachid Acharkaoui

Responsible for test section

M.Schäfers Responsible for test report



### 2. Administrative Data

### 2.1. Identification of the testing laboratory

Company name: CETECOM GmbH

Address: Im Teelbruch 116

45219 Essen - Kettwig

Germany

Responsible for testing laboratory: Dipl.-Ing. Rachid Acharkaoui

Deputy: Dipl.-Ing. Niels Jeß

#### 2.2. Test location

### 2.2.1. Test laboratory "CTC"

Company name:	see chapter 2.1. Identification of the testing laboratory
Company name.	see chapter 2.1. Identification of the testing laboratory

### 2.3. Organizational items

Responsible for test report: M. Schäfers

Receipt of EUT: -Date(s) of test: --

Date of report: 2018-03-27

### 2.4. Applicant's details

Applicant's name: Gemalto M2M GmbH

Address: Werinherstrasse 81

81541 Munich Germany

Contact person: Mr. Axel Heike

#### 2.5. Manufacturer's details

Manufacturer's name: please see applicant's details

Address: please see applicant's details



# 3. Equipment under test (EUT)

# 3.1. Summary of product description

TX-frequency range (E-UTRA operating bands)		☐ LTE Band 2: 1850 - 1910 MHz (Uplink), 1930-1990 MHz (Downlink)  ☑ LTE Band 4: 1710 - 1755 MHz (Uplink), 2110 - 2155 MHz (Downlink)  ☐ LTE Band 5: 824 - 849 MHz (Uplink), 869-894 MHz (Downlink)  ☐ LTE Band 7: 824 - 849 MHz (Uplink), 869-894 MHz (Downlink)  ☑ LTE Band 13: 777 - 787 MHz (Uplink), 746-756 MHz (Downlink)				
		☐ LTE Band 17: 704 - 716 MHz (Uplink), 734 - 746 MHz (Downlink)				
Type of modulation		QPSK, 16-QA				
Data rates			nlink: max. 300kt			ps
Number of channels			2: UARFCN range			
- Table 5.4.4-1 accord. 3G	PP		4: UARFCN range			
TS36.521-1			5: UARFCN range			
(See Note in 3GPP-Standard abo	n#		7: UARFCN range			
channels not to be used dependin			13: UARFCN ran			
channel bandwidths)		□ LIE Band	17: UARFCN ran	ge 23/30 -	23849	
		Channel bandwidth	QPSK Modu	lation:		AM Modulation Remark 1:
Emission designator(s)	LTE Band 13	5MHz (remark2)	1M15G7	'D	1	IM00W7D
	LTE Band 4	5MHz (remark 1)	1M14G7	'D	1	IM00W7D
Antenna Type		☐ Integrated	1			
V 2		☐ External, no	RF- connector			
		■ External, se	parate RF-connec	ctor		
Antenna Gain		698 – 960MHz: 1dBi 1710-2170MHz: 2.4 dBi				
MAX PEAK Output Powe	r:					
Radiated LTE-N	Mode 4	ERP: 25.38dBm +2.4 dBi = 27.78 dBm EIRP				
LTE B	and 13:	ERP: $dBm + 1dBi - 2.15 dB = 23.98dBm ERP$				
MAX PEAK Output Power Conducted LTE-M		25.38 dBm (AV) 25.13 dBm (AV)				
Installed option		<ul> <li>□ W-LAN, Bluetooth<sup>©</sup>, ANT+ wireless technologies</li> <li>□ battery charging option</li> <li>□ GPS (not tested within this test report)</li> <li>□ FM-Radio (Receiver only)</li> </ul>				
Power supply		☑ DC power only: 9-12 Volt on DSB75-Adapter with external AC/DC ACpower supply Converted to voltage range of 3.3 V to 4.41 V by DSB75-Adapter board or direct connection to DC				
Special EMI components						_
EUT sample type		<b>☒</b> Production		☐ Pre-Pro	oduction	☐ Engineering
FCC label attached		□ yes		<b>≥</b> no		□ other:

#### Remarks

- 1.) For 16-QAM maximum 5RBs could be activated in regard to category M1 device (3GPP 36.101, Annex 2.1.3) therefore nominal signal-bandwidth of 3/5/10/15/20MHz not possible
- 2.) For 16-QAM maximum 5RBs could be activated in regard to category M1 device (3GPP 36.101, Annex 2.1.3) therefore nominal signal-bandwidth of 5/10MHz not possible



### 3.2. EUT: Type, S/N etc. and short descriptions used in this test report

Short description*)	EUT	Туре	S/N serial number	HW hardware status	SW software status
EUT A	LTE Module Rel.13 CAT-M1	EMS31-V	004401082207 149	B2.1.1	5.0.0.0d

<sup>\*)</sup> EUT short description is used to simplify the identification of the EUT in this test report.

### 3.3. Auxiliary Equipment (AE): Type, S/N etc. and short descriptions

AE short description *)	Auxiliary Equipment	Туре	S/N serial number	HW hardware status	SW software status
AE 1	-	1	1		

<sup>\*)</sup> AE short description is used to simplify the identification of the auxiliary equipment in this test report.

### 3.4. EUT set-ups

EUT set-up no.*)	Combination of EUT and AE Remarks	
set. 1	EUT A	Only theoretically calculation

<sup>\*)</sup> EUT set-up no. is used to simplify the identification of the EUT set-up in this test report.

### 3.5. EUT operating modes

EUT operating mode no.*)	Description of operating modes	Additional information
op. 1		A communication link is established between the mobile station (UE) and
ор. 1	LTE-Band 4	the test simulator. The transmitter is operated on its maximum rated output
		power class: 23dBm nominal.  The input signal to the receiver is modulated with normal test modulation:
	eMTC Mode Auto	1 0
	RMC99	QPSK or 16-QAM Modulation.
		The wanted RF input signal level to the receiver of the mobile station is set
		to a level to provide a stable communication link.
op. 2		A communication link is established between the mobile station (UE) and
op. 2		the test simulator. The transmitter is operated on its maximum rated output
	LTE-Band 13	power class: 23dBm nominal.
		The input signal to the receiver is modulated with normal test modulation:
	eMTC Mode Auto	QPSK or 16-QAM Modulation.
		The wanted RF input signal level to the receiver of the mobile station is set
		to a level to provide a stable communication link.

<sup>\*)</sup> EUT operating mode no. is used to simplify the test report.



### 4. Measurements

### 4.1. Radio Frequency Exposure Evaluation §2.1091

4.1.1. Test location and equipment (for reference numbers please see chapter 'List of test equipment')

test location	☑ CETECOM Essen (Chapter. 2.2.1)	☐ Please see Chapter. 2.2.2	☐ Please see Chapter. 2.2.3
	For Evaluation instruments are not needed	d. Results are determined by calculation ba	sed on applicants delivered Tune-Up
	procedure.		

4.1.2. Requirements

4.1.2. Requirements	
FCC: §1.1310	The criteria used for the evaluation of human exposure to radio frequency radiation is table 1 according FCC §1.1310 and table chapter 4.2 of RSS-102 standard and it is subject for evaluation of the RF exposure prior to equipment authorization.  As the mobile equipment is authorized under Part 22 (Subpart H) and Part 24 of the FCC Rules, it is subject for evaluation of the RF exposure prior to equipment authorization.
FCC § 2.1091	Further information on evaluating compliance with these limits can be found in the FCC's OST/OET Bulletin Number 65, "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation."  For purposes of these requirements mobile devices are defined by the FCC as transmitters designed to be used in other than fixed locations and to generally be used in such a way that a separation distance of at least 20 centimeters is normally maintained between radiating structures and the body of the user or nearby persons. These devices are normally evaluated for exposure potential with relation to the MPE limits given in Table 1 of Appendix A.

### 4.1.2.1. Valid for FCC

Table 1: LIMITS FO	OR MAXIMUM PERM	ISSIBLE EXPOSURE (N	MPE)		
Frequency range	Electric field strength	Magnetic field strength	Power density	Averaging time	
[MHz)	[V/m]	[A/m]	[mW/cm <sup>2</sup> ]	[minutes]	
30 - 300	61.4	0.163	1.0	6	
300 - 1500	-		f/300	6	
1500 - 100,000	-		5	6	
	(B) Limits for General Population / Uncontrolled Exposure				
0.3 - 1.34	614	1.63	*(100)	30	
1.34 - 30	824/f	2.19/f	*(180/f²)	30	
30 - 300	27.5	0.073	0.2	30	
300 - 1500	-	-	f/1500	30	
1500 - 100,0	-	-	1.0	30	

f=frequency in MHz

NOTE1: 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. These limits apply to amateur station licensees and members of their immediate household as discussed in the text.

NOTE2: 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 cannot exercise control over their exposure. As discussed in the text, these limits apply to neighbours living near amateur radio stations.

<sup>\*</sup>Plane-wave equivalent power density



### **4.1.3** General Limits:

·	
FCC: §1.1307	Cellular Radiotelephone Service (subpart H of part 22) Non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 1000 W ERP (1640 W EIRP)
FCC §1.1307	Personal Communications Services (part 24) Broadband PCS (subpart E): non-building-mounted antennas: height above ground level to lowest point of antenna < 10 m and total power of all channels > 2000 W ERP (3280 W EIRP)
FCC §1.1310	LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE) Table 1(B) Limits for General Population/Uncontrolled Exposure 300–1500 MHz: f/1500 mW/cm² 1500–100,000 MHz: 1.0 mW/cm²
FCC §2.1091	Subject to routine evaluation is required when the device operate at frequencies of 1.5 GHz or below and their effective radiated power (ERP) is 1.5 watts or more, or if they operate at frequencies above 1.5 GHz and their ERP is 3 watts or more.
FCC §24.232	(a) Base stations are limited to 1640 watts peak equivalent isotropically radiated power (e.i.r.p.) with an antenna height up to 300 meters HAAT. b) Mobile/portable stations are limited to 2 watts e.i.r.p. peak power,
FCC §22.913	(a) Maximum ERP. The effective radiated power (ERP) of base transmitters and cellular repeaters must not exceed 500 Watts. The ERP of mobile transmitters and auxiliary test transmitters must not exceed 7 Watts.
FCC §27.50 (C)(10)	(10) Portable stations (hand-held devices) are limited to 3 watts ERP; and
FCC §27.50(d)	(4) Fixed, mobile, and portable (hand-held) stations operating in the 1710-1755 MHz band are limited to 1 watt EIRP.
KDBs	No. 447498 D01 v06



#### 4.2. MPE Calculation method

Predication of MPE limit at a given distance Equation from page 18 of OET Bulletin 65, Edition 97-01

$$S = \frac{EIRP}{4\pi R^2} = \frac{P * G}{4\pi R^2}$$

$$G_{NUMERIC} = \frac{S * 4\pi R^2}{P}$$

Where: S=power density

P=power input to antenna

G=power gain of the antenna in the direction of interest relative to an isotropic radiator

R=distance to the centre of radiation of the antenna

#### 4.3. Evaluation Method

#### Valid for LTE Mode:

- The power was checked on 3 frequencies (lowest/middle/highest) within each operable FDD-band (see separate report for W-CDMA technology) and the results compared to applicant's declared power values (tune-up info). A RMS detector was used.
- No duty-cycle correction factor is applicable

Please find in the following tables the calculations based on applicants tune-up information for the power values. Also the maximum admissible allowed antenna gain is calculated which is not exceeding the MPE limit for fixed and mobile operations.



### 4.4. Results for fixed and mobile

### 4.4.1. Results for lower operational band: LTE Band 13

### **4.4.1.1. MPE results**

Operating Mode	Frequency on channel	Declared maximum conducted output power	Max. positive tolerance according manufacturer	Calculated maximum EIRP (declared+ Tune-up+ antenna Gain)	Duty cycle	Declared Maximum EIRP	Equivalent ERP (maximum ERP x duty cycle) (mW)	MPE Limit accord. Table 1	MPE-Value	Margin to limit:	Fraction for Co- Location calculations	Max. Fraction- Value within Frequency- Band
	(MHz)	(dBm)	(dB)	(dBm)	%	(W)		(mW/cm^2)	(m W/cm ^2)	(m W/cm ^2)		
LTE Band 13	779,5	23,0	2,5	25,5	100%	0,355	355	0,5197	0,0706	0,4491	0,1358	0,1358
(QPSK, #RB=1, RMS- Value)	782	23,0	2,5	25,5		0,355	355	0,5213	0,0706	0,4507	0,1354	
	784,5	23,0	2,5	25,5		0,355	355	0,5230	0,0706	0,4524	0,1350	
LTE Band 13 (16QAM, #RB=1, RMS-	779,5	23,0	2,5	25,5		0,355	355	0,5197	0,0706	0,4491	0,1358	
	782	23,0	2,5	25,5	100%	0,355	355	0,5213	0,0706	0,4507	0,1354	0,1358
Value)	784,5	23,0	2,5	25,5		0,355	355	0,5230	0,0706	0,4524	0,1350	

Maximum cal	culated MPE va	lue:
Lowest MPE-Limit in Frequency-Band:	0,4665	[m W/cm ^2]
Highest MPE value in frequency-band:	0,0706	[m W/cm ^2]
Lowest margin to limit in frequency band:	0,4491	[m W/cm ^2]

### Maximum antenna gain considerations for fixed/mobile operations for complying with limits:

Р	Maximum pow er input to the antenna incl. Duty cycle [mW]: (Avg. Burst Pow er or RMS)	355
R	Distance [cm]:	20
S	MPE limit acc. §1.1310 for uncontrolled exposure [mW/cm²]:  (FCC use mW/cm²)	0,47
G <sub>1</sub>	Maximum Antenna gain to comply with MPE limit [dBi]:	8,67

(For G1 the low est measured channel to reach minimum ant. Gain selected)

	ERP pow er limit according to §2.1091 [W]:  (Avg. Burst Power or RMS)		
$G_{\!\scriptscriptstyle 2}$	Max. Antenna gain to comply with limit incl. Duty cycle [dBi]:	8,41	

(For G2 select the max. Avg. Burst Pow er or RMS value incl. Duty cycle)

	ERP pow er limit according to §27.50(b)(10) [W ERP]:		
G <sub>3 -(698MHZ)</sub>	Max. Antenna gain to comply with limit [dBi]:	11,42	

(For G3 select the  $\max$  . Average burst power value excluding Duty cycle)

G <sub>850 MHz band</sub>	Min (G <sub>1</sub> , G <sub>2</sub> , G <sub>3</sub> ) [dBi]	8,41

Summarized results:	The max. ant. gain for mobile operation at 700/850MHz band to comply with MPE and EIRP limits incl. path loss shall not exceed (dBi):	8,41	dBi
		6,26	dBd



### 4.4.2. Results for upper operational band: LTE Band 4

### **4.4.2.1. MPE results**

Operating Mode	Frequency on channel	Declared maximum conducted output power	Max. positive tolerance according manufacturer	Calculated maximum ERP (declared+ Tune-up+ antenna Gain) (dBm)	Duty cycle	Declared Maximum EIRP	Equivalent EIRP (maximum EIRP x duty cycle)	MPE Limit accord. Table 1	MPE-Value	Margin to limit:	Fraction for Co-Location calculations	Max. Fraction- Value within Frequency- Band
	(MHz)	(dBm)	(dB)		%	(W)	(mW)	(m W/cm ^2	(m W/cm ^2)	(m W/cm ^2)		
LTE Band 4	1710,7	23,0	2,5	25,5		0,3548	354,8	1,0000	0,0706	0,9294	0,070588	
(QPSK, #1RB, RMS-	1732,5	23,0	2,5	25,5	100%	0,3548	354,8	1,0000	0,0706	0,9294	0,070588	0,0705879
Value)	1754,3	23,0	2,5	25,5		0,3548	354,8	1,0000	0,0706	0,9294	0,070588	1
LTE Band 4	1710,7	23,0	2,5	25,5		0,3548	354,8	1,0000	0,0706	0,9294	0,070588	
(16QAM, #1RB, RMS-	1732,5	23,0	2,5	25,5	100%	0,3548	354,8	1,0000	0,0706	0,9294	0,070588	0,0705879
Value)	1754,3	23,0	2,5	25,5		0,3548	354,8	1,0000	0,0706	0,9294	0,070588	1

Maximum ca	culated MPE	/alue:
Lowest MPE-Limit in frequency-band:	1,0000	[mW/cm^2]
Highest MPE value in frequency-band:	0,0706	[m W/cm ^2]
Lowest margin to limit in frequency- band:	0,93	[mW/cm^2]

### Maximum antenna gain considerations for fixed/mobile operations for complying with limits:

Р	Maximum pow er input to the antenna incl. Duty cycle (mW): (Avg. Burst Pow er or RMS)		355
R	Distance (cm):		20
S	MPE limit acc. §1.1310 for uncontrolled exposure (mW/cm²):  (FCC use mW)		1,00
G <sub>1</sub>	Maximum Antenna gain to comply with MPE limit (dBi):		11,51

(For G1 the low est measured channel to reach minimum ant. Gain selected)

	ERP pow er limit according to §2.1091 [W]:		
	(Avg. Burst Pow er or RMS)		3,00
G <sub>2</sub>	Max. Antenna gain to comply with this limit incl. Duty cycle (dBi):		11,42

(For G2 select the max. Avg. Burst Power or RMS value incl. Duty cycle)

	EIRP pow er limit according to §27.50(d)(4) [W]:		
G₃	Max. Antenna gain to comply w ith this limit (dBi):		4,50

(For G3 select the  $\max$  . Average burst pow er value excluding  $\operatorname{Duty}\,\operatorname{cycle})$ 

Min (G <sub>1</sub> , G <sub>2</sub> , G <sub>3</sub> ) (dBi)		
	Min (G <sub>1</sub> , G <sub>2</sub> , G <sub>3</sub> ) (dBi)	

			4,50
results:	shall not exceed <b>(dBi)</b> :		4,50



### 4.5. Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1091 for the uncontrolled RF Exposure of mobile device.

### 4.6. Measurement uncertainties

The reported uncertainties are calculated based on the standard uncertainty multiplied with the appropriate coverage factor **k**, such that a confidence level of approximately 95% is achieved.

For uncertainty determination, each component used in the concrete measurement set-up was taken in account and it's contribution to the overall uncertainty according it's statistical distribution calculated.

Following table shows expectable uncertainties for each measurement type performed.

RF-Measurement	Reference	Frequency range	Calculated uncertainty based on a confidence level of 95%			Remarks			
Conducted emissions (U CISPR)	CISPR 16-2-1	9 kHz - 150 kHz 150 kHz - 30 MHz	4.0 dB 3.6 dB			-			
Radiated emissions Enclosure	CISPR 16-2-3	30 MHz - 1 GHz 1 GHz - 18 GHz	4.2 dB 5.1 dB				E-Field		
Disturbance power	CISPR 16-2-2	30 MHz - 300 MHz	-						-
Power Output radiated	-	30 MHz - 4 GHz	3.17 dB			Substitution method			
Down Output conducted		Set-up No.	Cel- C1	Cel- C2	BT1	W1	W2		
Power Output conducted	-	9 kHz - 12.75 GHz	N/A	0.60					-
		12.75 - 26.5GHz	N/A	0.82					
Conducted emissions	-	9 kHz - 2.8 GHz	0.70	N/A					N/A - not
on RF-port		2.8 GHz - 12.75GHz	1.48	N/A					applicable
		12.75 GHz - 18GHz	1.81	N/A					
		18 GHz - 26.5GHz	1.83	N/A					
Occupied bandwidth		9 kHz - 4 GHz	0.1272 ppm (Delta Marker)				Frequency error		
Occupied bandwidth	_	y KHZ - 4 OHZ	1.0 dB			Power			
	-		0.1272 ppm (Delta Marker)			Frequency			
Emission bandwidth 9 kHz - 4 GHz			error						
	-		See above: 0.70 dB			Power			
Frequency stability	-	9 kHz - 20 GHz	0.0636 ppm			-			
Radiated emissions Enclosure	-	150 kHz - 30 MHz 30 MHz - 1 GHz 1 GHz - 20 GHz	5.0 dB 4.2 dB 3.17 dB			Magnetic field E-field Substitution			

Table: measurement uncertainties, valid for conducted/radiated measurements



# 5. Abbreviations used in this report

The abbreviations					
ANSI	American National Standards Institute				
AV, AVG, CAV	Average detector				
EIRP	Equivalent isotropically radiated power, determined within a separate measurement				
EGPRS	Enhanced General Packet Radio Service				
EUT	Equipment Under Test				
FCC	Federal Communications Commission, USA				
IC	Industry Canada				
n.a.	not applicable				
Op-Mode	Operating mode of the equipment				
PK	Peak				
RBW	resolution bandwidth				
RF	Radio frequency				
RSS	Radio Standards Specification, Dokuments from Industry Canada				
Rx	Receiver				
TCH	Traffic channel				
Tx	Transmitter				
QP	Quasi peak detector				
VBW	Video bandwidth				
ERP	Effective radiated power				

# 6. Accreditation details of CETECOM's laboratories and test sites

Ref No.	Accreditation Certificate	Valid for laboratory area or test site	Accreditation Body				
-	D-PL- 12047-01-01	All laboratories and test sites of CETECOM GmbH, Essen	DAkkS, Deutsche Akkreditierungsstelle GmbH				
337 487 558 348 348	MRA US-EU 0003	Radiated Measurements 30 MHz to 1 GHz, 3 m / 10 m (OATS) Radiated Measurements 30 MHz to 1 GHz, 3 m (SAR) Radiated Measurements above 1 GHz, 3 m (FAR) Mains Ports Conducted Interference Measurements Telecommunication Ports Conducted Interference Measurem.	FCC, Federal Communications Commission Laboratory Division, USA				
337	3462D-1	Radiated Measurements 30 MHz to 1 GHz, 3 m / 10 m (OATS)					
487	3462D-2	Radiated Measurements 30 MHz to 1 GHz, 3 m (SAR)	IC, Industry Canada Certification				
550	3462D-2	Radiated Measurements 1 GHz to 6 GHz, 3 m (SAR)	and Engineering Bureau				
558	3462D-3	Radiated Measurements above 1 GHz, 3 m (FAR)					
487	R-2666	Radiated Measurements 30 MHz to 1 GHz, 3 m (SAR)	VCCI, Voluntary Control Council				
550	G-301	Radiated Measurements 1 GHz to 6 GHz, 3 m (SAR)	for Interference by Information				
348	C-2914	Mains Ports Conducted Interference Measurements	Technology Equipment, Japan				
348	T-1967	Telecommunication Ports Conducted Interference Measurem.	reciniology Equipment, Japan				
OATS = Open Area Test Site, SAR = Semi Anechoic Room, FAR = Fully Anechoic Room							

# 8. Versions of test reports (change history)

Version	Applied changes	Date of release
	Initial release	2018-03-27