

Certification Test Report

FCC ID: R7PIWRS4 IC: 5294A-IWRS4

FCC Rule Part: 15.247
IC Radio Standards Specification: RSS-210

ACS Report Number: 11-0338.W04.11.A

Manufacturer: Cellnet Technology Inc. Model(s): DCIWR, IPIWR

Test Begin Date: September 6, 2011 Test End Date: September 6, 2011

Report Issue Date: September 7, 2011



FOR THE SCOPE OF ACCREDITATION UNDER LAB Code 200612-0

This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.

Reviewed by:

Kirby Munroe
Director, Wireless Certifications
ACS, Inc.

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This report contains 20 pages

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Model(s): DCIWR, IPIWR FCC ID: R7PIWRS4 IC: 5294A-IWRS4

1 GENERAL

1.1 Purpose

The purpose of this report is to demonstrate compliance with Part 15 Subpart C of the FCC's Code of Federal Regulations and Industry Canada's Radio Standards Specification RSS-210 for a class II Permissive change. This class II permissive change is to include a 50kbps data rate (i.e. SUN Mode) and to address a change in the TCXO.

1.2 Product description

The DCIWR and IPIWR are stand-alone RF modules used in utility industry for automatic meter reading applications. The DCIWR and IPIWR are two-way radio frequency devices that use Cellnet RF technology and protocol to transmit data over a mesh network in the unlicensed 902-928 MHz frequency range.

Technical Details:

The EUT provides 4 distinct modes of operation as outlined below.

Mode of Operation	Frequency Range (MHz)	Number of Channels	Channel Separation (kHz)	Data Rates Supported (kbps)
Wide Mode	902.3 - 927.8	86	300	9.6, 19.2, 38.4, 76.8, 115.2
Narrow Mode	904.0 - 927.9	240	100	9.6, 19.2, 38.4
Full Narrow Mode	902.3 - 927.8	256	100	9.6, 19.2, 38.4
*SUN Mode	902.2 – 927.8	129	200	50.0

^{*} New mode evaluated under class II permissive change. All other modes have been evaluated under the original certification.

Modulation format: FSK/GFSK

Antenna Type/Gain: Omni-directional, maximum gain +5.5 dBi

Operating Voltage: 12VDC

Manufacturer Information: Cellnet Technology, Inc. 30000 Mill Creek Ave., Suite 100 Alpharetta, GA 30022

Test Sample Serial Number(s): LT-8073816C

Test Sample Condition: The test samples were provided in good working order with no visible defects.

1.3 Test Methodology and Considerations

The addition of the 50kbps data rate introduces an extended frequency band, alternate channel spacing and alternate number of hopping channels when compared to the originally certified device, therefore all characteristics with respect to the 50kbps data rate were evaluated and reported.

Model(s): DCIWR, IPIWR FCC ID: R7PIWRS4 IC: 5294A-IWRS4

2 TEST FACILITIES

2.1 Location

The radiated and conducted emissions test sites are located at the following address:

Advanced Compliance Solutions 5015 B.U. Bowman Drive Buford, GA 30518 Phone: (770) 831-8048

Phone: (770) 831-8048 Fax: (770) 831-8598

2.2 Laboratory Accreditations/Recognitions/Certifications

ACS is accredited to ISO/IEC 17025 by the National Institute of Standards and Technology under their National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code 200612-0. Unless otherwise specified, all tests methods described within this report are covered under the ISO/IEC 17025 scope of accreditation.

The Semi-Anechoic Chamber Test Site, Open Area Test Site (OATS) and Conducted Emissions Site have been fully described, submitted to, and accepted by the FCC, Industry Canada and the Japanese Voluntary Control Council for Interference by information technology equipment.

FCC Registration Number: 511277 Industry Canada Lab Code: IC 4175A-1

VCCI Member Number: 1831

VCCI OATS Registration Number R-1526

VCCI Conducted Emissions Site Registration Number: C-1608

2.3 Radiated Emissions Test Site Description

2.3.1 Semi-Anechoic Chamber Test Site

The Semi-Anechoic Chamber Test Site consists of a 20° x 30° x 18° shielded enclosure. The chamber is lined with Toyo Ferrite Grid Absorber, model number FFG-1000. The ferrite tile grid is $101 \times 101 \times 19$ mm thick and weighs approximately 550 grams. These tiles are mounted on steel panels and installed directly on the inner walls of the chamber.

The turntable is 150cm in diameter and is located 160cm from the back wall of the chamber. The chamber is grounded via 1 - 8' copper ground rod, installed at the center of the back wall, it is bound to the ground plane using 3/4" stainless steel braided cable.

The turntable is all steel, flush mounted table installed in an all steel frame. The table is remotely operated from inside the control room located 25' from the range. The turntable is electrically bonded to the surrounding ground plane via steel fingers installed on the edge of the turn table. The steel fingers make constant contact with the ground plane during operation.

Behind the turntable is a $3' \times 6' \times 4'$ deep shielded pit used for support equipment if necessary. The pit is equipped with 1 - 4'' PVC chases from the turntable to the pit that allow for cabling to the EUT if necessary. The underside of the turntable can be accessed from the pit so cables can be supplied to the EUT from the pit.

A diagram of the Semi-Anechoic Chamber Test Site is shown in Figure 2.3-1 below:

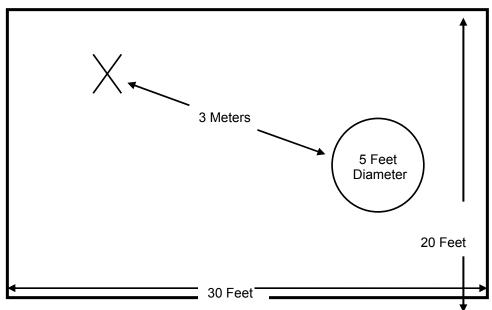


Figure 2.3-1: Semi-Anechoic Chamber Test Site

2.3.2 Open Area Tests Site (OATS)

The open area test site consists of a 40' x 66' concrete pad covered with a perforated electroplated galvanized sheet metal. The perforations in the sheet metal are 1/8" holes that are staggered every 3/16". The individual sheets are placed to overlap each other by 1/4" and are riveted together to provide a continuous seam. Rivets are spaced every 3" in a 3 x 20 meter perimeter around the antenna mast and EUT area. Rivets in the remaining area are spaced as necessary to properly secure the ground plane and maintain the electrical continuity.

The entire ground plane extends 12' beyond the turntable edge and 16' beyond the antenna mast when set to a 10 meter measurement distance. The ground plane is grounded via 4 - 8' copper ground rods, each installed at a corner of the ground plane and bound to the ground plane using 3/4" stainless steel braided cable.

The turntable is an all aluminum 10' flush mounted table installed in an all aluminum frame. The table is remotely operated from inside the control room located 40' from the range. The turntable is electrically bonded to the surrounding ground plane via steel fingers installed on the edge of the turn table. The steel fingers make constant contact with the ground plane during operation.

Adjacent to the turntable is a 7' x 7' square and 4' deep concrete pit used for support equipment if necessary. The pit is equipped with 5 - 4" PVC chases from the pit to the control room that allow for cabling to the EUT if necessary. The underside of the turntable can be accessed from the pit so cables can be supplied to the EUT from the pit. The pit is covered with 2 sheets of 1/4" diamond style re-enforced steel sheets. The sheets are painted to match the perforated steel ground plane; however the underside edges have been masked off to maintain the electrical continuity of the ground plane. All reflecting objects are located outside of the ellipse defined in ANSI C63.4.

A diagram of the Open Area Test Site is shown in Figure 2.3-2 below:

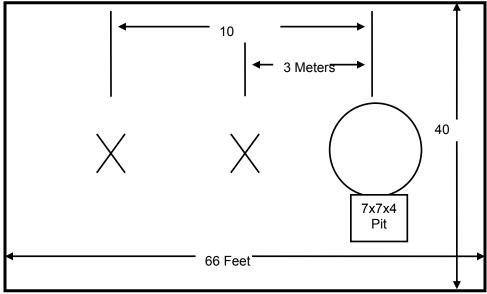


Figure 2.3-2: Open Area Test Site

2.4 Conducted Emissions Test Site Description

The AC mains conducted EMI site is located in the main EMC lab. It consists of an 8' x 8' solid aluminum horizontal group reference plane (GRP) bonded every 3" to an 8' X 8' vertical ground plane.

The site is of sufficient size to test table top and floor standing equipment in accordance with section 6.1.4 of ANSI C63.4.

A diagram of the room is shown below in figure 4.1.3-1:

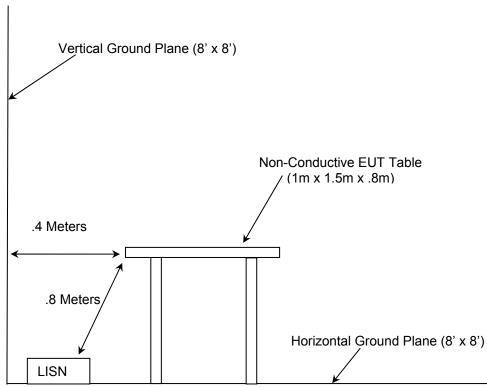


Figure 2.4-1: AC Mains Conducted EMI Site

3 APPLICABLE STANDARD REFERENCES

The following standards were used:

- ANSI C63.4-2003: Method of Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the 9KHz to 40GHz
- US Code of Federal Regulations (CFR): Title 47, Part 2, Subpart J: Equipment Authorization Procedures, 2011
- US Code of Federal Regulations (CFR): Title 47, Part 15, Subpart C: Radio Frequency Devices, Intentional Radiators, 2011
- ❖ FCC Public Notice DA 00-705 Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems, March 30, 2000
- Industry Canada Radio Standards Specification: RSS-210 Low-power License-exempt Radiocommunication Devices (All Frequency Bands): Category I Equipment, Issue 8, December 2010
- ❖ Industry Canada Radio Standards Specification: RSS-GEN General Requirements and Information for the Certification of Radiocommunication Equipment, Issue 3, December 2010.

4 LIST OF TEST EQUIPMENT

The calibration interval of test equipment is annually or the manufacturer's recommendations. Where the calibration interval deviates from the annual cycle based on the instrument manufacturer's recommendations, it shall be stated below.

Table 4-1: Test Equipment

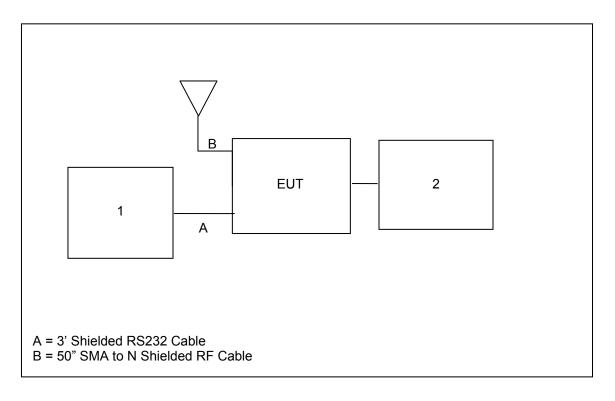
						Calibration
AssetID	Manufacturer	Model #	Equipment Type	Serial #	Last Calibration Date	Due Date
1	Rohde & Schwarz	ESMI - Display	Spectrum Analyzers	833771/007	9/23/2010	9/23/2012
2	Rohde & Schwarz	ESMI-Receiver	Spectrum Analyzers	839587/003	9/23/2010	9/23/2012
30	Spectrum Technologies	DRH-0118	Antennas	970102	4/27/2011	4/27/2013
41	Electro-Metrics	BIA-25	Antennas	2925	12/21/2010	12/21/2012
73	Agilent	8447D	Amplifiers	2727A05624	3/21/2011	3/21/2012
152	EMCO	3825/2	LISN	9111-1905	11/2/2010	11/2/2012
		Chamber EMI				
167	ACS	Cable Set	Cable Set	167	1/26/2011	1/26/2012
168	Hewlett Packard	11947A	Attenuators	44829	2/4/2011	2/4/2012
283	Rohde & Schwarz	FSP40	Spectrum Analyzers	1000033	8/26/2011	8/26/2012
		SMRE-200W-12.0-	·			
291	Florida RF Cables	SMRE	Cables	None	12/7/2010	12/7/2011
		SMR-290AW-				
292	Florida RF Cables	480.0-SMR	Cables	None	4/11/2011	4/11/2012
324	ACS	Belden	Cables	8214	7/6/2011	7/6/2012
337	Microwave Circuits	H1G513G1	Filters	282706	7/11/2011	7/11/2012
338	Hewlett Packard	8449B	Amplifiers	3008A01111	3/24/2011	3/24/2012
340	Aeroflex/Weinschel	AS-20	Attenuators	7136	8/29/2011	8/29/2012
412	Electro Metrics	LPA-25	Antennas	1241	7/28/2010	7/28/2012
		SMS-200AW-72.0-				
422	Florida RF	SMR	Cables	805	12/29/2010	12/29/2011

5 SUPPORT EQUIPMENT

Table 5-1: Support Equipment

Item	Equipment Type	Manufacturer	Model Number	Serial Number
1	Laptop	Dell	PP10L	CN-0H2049-48643-46F-1251
	AC Adapter			
2	(12VDC/1Amp)	Utilinet	3A-111WX12	N/A

6 EQUIPMENT UNDER TEST SETUP BLOCK DIAGRAM



7 SUMMARY OF TESTS

Along with the tabular data shown below, plots were taken of all signals deemed important enough to document.

7.1 Antenna Requirement – FCC: Section 15.203

The antenna is an omni-directional whip antenna with a maximum gain of +5.5 dBi. The antenna coupling is SMA therefore professional installation is required.

7.2 Power Line Conducted Emissions – FCC: Section 15.207 IC: RSS-Gen 7.2.4

7.2.1 Measurement Procedure

ANSI C63.4 sections 6 and 7 were the guiding documents for this evaluation. Conducted emissions were performed from 150kHz to 30MHz with the spectrum analyzer's resolution bandwidth set to 9kHz and the video bandwidth set to 30kHz. The calculation for the conducted emissions is as follows:

Corrected Reading = Analyzer Reading + LISN Loss + Cable Loss Margin = Applicable Limit - Corrected Reading

7.2.2 Measurement Results

Results of the test are shown below in and Tables 7.2.2-1 to 7.2.2-2.

Table 7.2.2-1: Line 1 Conducted EMI Results

Frequency (MHz)	Level (dBuV)	Transducer (dB)	Limit (dBuV)	Margin (dB)	Line	PE	Detector
0.192	44.3	9.9	64	19.6	L1	FLO	QP
2.964	33.6	9.9	56	22.4	L1	FLO	QP
3.288	33.9	9.9	56	22.1	L1	FLO	QP
3.546	33.8	9.9	56	22.2	L1	FLO	QP
3.672	33.4	9.9	56	22.6	L1	FLO	QP
3.87	33	9.9	56	23	L1	FLO	QP
3.996	34.3	9.9	56	21.7	L1	FLO	QP
4.254	33.9	9.9	56	22.1	L1	FLO	QP
4.836	33.7	10	56	22.3	L1	FLO	QP
4.902	32.5	10	56	23.5	L1	FLO	QP
0.258	28.7	10	52	22.8	L1	FLO	AVG
2.964	31.3	9.9	46	14.7	L1	FLO	AVG
3.288	32.3	9.9	46	13.7	L1	FLO	AVG
3.546	31.5	9.9	46	14.5	L1	FLO	AVG
3.672	29.2	9.9	46	16.8	L1	FLO	AVG
3.87	28.6	9.9	46	17.4	L1	FLO	AVG
3.996	31.1	9.9	46	14.9	L1	FLO	AVG
4.254	31.7	9.9	46	14.3	L1	FLO	AVG
4.836	28.8	10	46	17.2	L1	FLO	AVG
4.902	28.1	10	46	17.9	L1	FLO	AVG

Table 7.2.2-2: Line 2 Conducted EMI Results

Frequency (MHz)	Level (dBuV)	Transducer (dB)	Limit (dBuV)	Margin (dB)	Line	PE	Detector
0.192	45.1	9.9	64	18.8	L1	FLO	QP
1.872	33.2	10	56	22.8	L1	FLO	QP
2.964	36	9.9	56	20	L1	FLO	QP
3.222	35.5	9.9	56	20.5	L1	FLO	QP
3.288	35.6	9.9	56	20.4	L1	FLO	QP
3.546	35.2	9.9	56	20.8	L1	FLO	QP
3.672	35.7	9.9	56	20.3	L1	FLO	QP
3.996	35.8	9.9	56	20.3	L1	FLO	QP
4.122	32.3	9.9	56	23.7	L1	FLO	QP
4.32	34.5	9.9	56	21.5	L1	FLO	QP
0.192	35.2	9.9	54	18.7	L1	FLO	AVG
1.872	32.3	10	46	13.7	L1	FLO	AVG
2.964	33.6	9.9	46	12.4	L1	FLO	AVG
3.288	34.2	9.9	46	11.8	L1	FLO	AVG
3.546	33.2	9.9	46	12.8	L1	FLO	AVG
3.672	31.7	9.9	46	14.3	L1	FLO	AVG
3.996	33.1	9.9	46	12.9	L1	FLO	AVG
4.128	26.7	9.9	46	19.3	L1	FLO	AVG
4.32	32.5	9.9	46	13.5	L1	FLO	AVG

7.3 Peak Output Power - FCC Section 15.247(b)(2) IC: RSS-210 A8.4(1)

7.3.1 Measurement Procedure (Conducted Method)

The RF output of the equipment under test was directly connected to the input of the power meter. Data was collected with the EUT operating at maximum power per channelization.

7.3.2 Measurement Results

Results are shown below in Table 7.3.2-1 below:

Table 7.3.2-1: RF Output Power

Frequency [MHz]	Level [dBm]
902.2	29.83
915.0	29.73
927.8	29.79

7.4 Channel Usage Requirements

7.4.1 Carrier Frequency Separation – FCC: Section 15.247(a)(1) IC: RSS-210 A8.1(b)

7.4.1.1 Measurement Procedure

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The span of the spectrum analyzer was set wide enough to capture two adjacent peaks and the RBW and VBW were set to $\geq 1\%$ of the span.

Carrier frequency separation was measured for 50kbps data rate (i.e. SUN mode) and data presented in section 7.4.1.2 below.

7.4.1.2 Measurement Results

The adjacent channel separation was measured to be 200kHz for Sun Mode (129 channels). Results are shown below in Figure 7.4.1.2-1.



Figure 7.5.1.2-1: 50kbps Data Rate (SUN Mode)

7.4.2 Number of Hopping Channels – FCC: Section 15.247(a)(1)(i) IC: RSS-210 A8.1(c)

The 20dB bandwidth of the device is less than 250 kHz. The device employs > 50 hopping channels as required. Results are shown below in Figures 7.4.2-1 to 7.4.2-3.

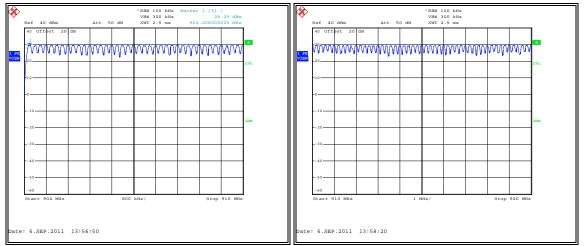


Figure 7.4.2-1: SUN Mode (129 Channels)

Figure 7.4.2-2: SUN Mode (129 Channels)

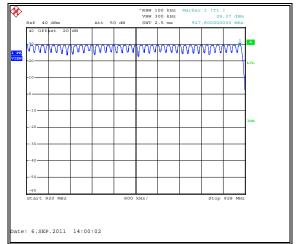


Figure 7.4.2-3: SUN Mode (129 Channels)

7.4.3 Channel Dwell Time – FCC: Section 15.247(a)(1)(i) IC: RSS-210 A8.1(c)

7.4.3.1 Measurement Procedure

The EUT test mode does not generate a worst case channel dwell time therefore a detailed engineering analysis is provided in the theory of operation.

As described in the theory of operation, the maximum channel transmitter dwell time is < 400ms per channel hop with the minimum period of 700ms between hops. Therefore the maximum time of occupancy on any one channel with a 20s period is <400ms for all modes of operation.

7.4.4 20dB / 99% Bandwidth - FCC: Section 15.247(a)(1)(i) IC: RSS-210 A8.1(c)

7.4.4.1 Measurement Procedure

The span of the spectrum analyzer display was set between two times and five times the occupied bandwidth (OBW) of the emission. The RBW of the spectrum analyzer was set to approximately 1% to 5% of the OBW.

The 99% occupied bandwidth was measured with the spectrum analyzer span set to fully display the emission and side bands. The RBW was to \sim 1% of the span. The trace was set to max hold with a sample detector. The occupied bandwidth measurement function of the analyzer was used for the 99% bandwidth.

7.4.4.2 Measurement Results

Results are shown below in Table 7.4.4.2-1 and Figures 7.4.4.2-1 through 7.4.4.2-6.

Table 7.4.4.2-1: 20dB / 99% Bandwidth

Frequency [MHz]	20dB Bandwidth [kHz]	99% Bandwidth [kHz]	Data Rate (kbps)
902.2	104.5	100.0	50.0
915.0	104.5	99.5	50.0
927.8	105.0	160.6	50.0





Figure 7.4.4.2-1: 20dB BW Low Channel

Figure 7.4.4.2-2: 20dB BW Mid Channel

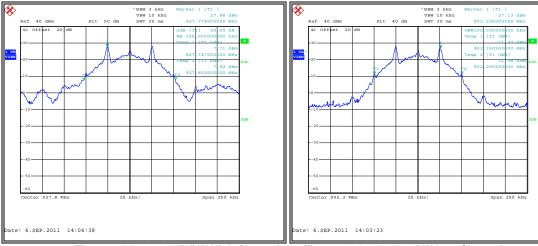


Figure 7.4.4.2-3: 20dB BW High Channel

Figure 7.4.4.2-4: 99% BW Low Channel

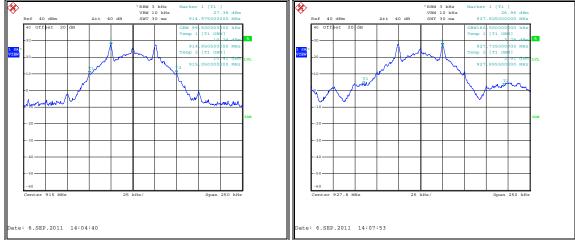


Figure 7.4.4.2-5: 99% BW Mid Channel

Figure 7.4.4.2-6: 99% BW High Channel

7.5 Band-Edge Compliance and Spurious Emissions-FCC 15.247(d) IC: RSS-210 2.2, A8.5

7.5.1 **Band-Edge Compliance of RF Conducted Emissions**

7.5.1.1 Measurement Procedure

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The EUT was investigated at the lowest and highest channel available to determine band-edge compliance. For each measurement the spectrum analyzer's RBW was set to 100 kHz and the VBW was set to 300kHz.

Band-edge was evaluated for 50.0kbps data rate (Sun Mode).

7.5.1.2 Measurement Results

Results are shown in the figures 7.5.1.2-1 to 7.5.1.2-4 below.

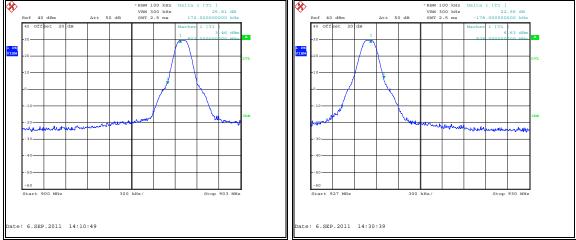


Figure 7.5.1.2-1: Lower Band-edge

Figure 7.5.1.2-2: Upper Band-edge

HOPPING MODE:

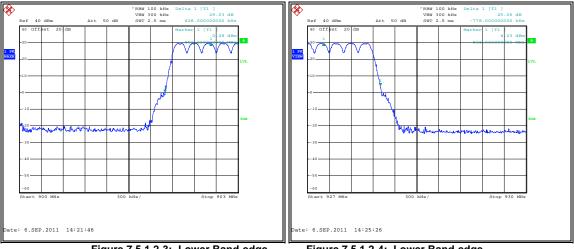


Figure 7.5.1.2-3: Lower Band-edge

Figure 7.5.1.2-4: Lower Band-edge

RF Conducted Spurious Emissions 7.5.2

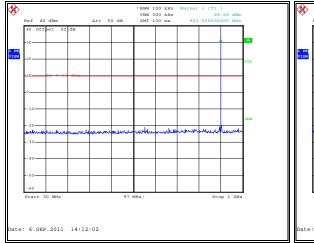
7.5.2.1 **Measurement Procedure**

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The EUT was investigated for conducted spurious emissions from 30MHz to 10GHz, 10 times the highest fundamental frequency. Measurements were made at the low, center and high channels of the EUT. For each measurement, the spectrum analyzer's RBW was set to 100kHz. A peak detector function was used with the trace set to max hold.

RF conducted spurious emissions were evaluated for 50.0kbps data rate (Sun Mode).

7.5.2.2 Measurement Results

Results are shown below in Figures 7.5.2.2-1 to 7.5.2.2-6:



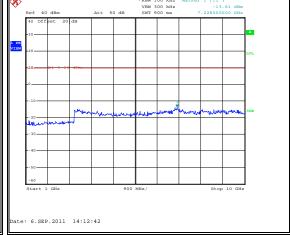
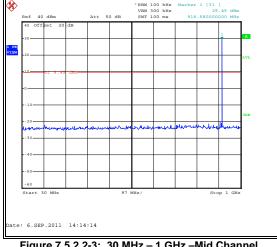


Figure 7.5.2.2-1: 30 MHz - 1 GHz - Low Channel

Figure 7.5.2.2-2: 1 GHz - 10 GHz - Low Channel



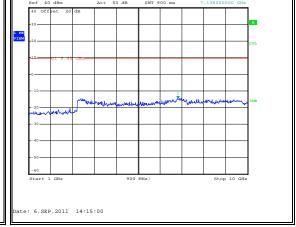


Figure 7.5.2.2-3: 30 MHz - 1 GHz - Mid Channel

Figure 7.5.2.2-4: 1 GHz - 10 GHz - Mid Channel

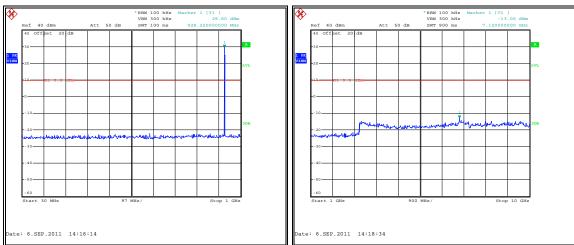


Figure 7.5.2.2-5: 30 MHz – 1 GHz – High Channel

Figure 7.5.2.2-6: 1 GHz – 10 GHz – High Channel

7.5.3 Radiated Spurious Emissions (Restricted Bands)

7.5.3.1 Measurement Procedure

Radiated emissions tests were made over the frequency range of 30MHz to 10GHz, 10 times the highest fundamental frequency.

FCC ID: R7PIWRS4

The EUT was rotated through 360° and the receive antenna height was varied from 1m to 4m so that the maximum radiated emissions level would be detected. For frequencies below 1000MHz, quasi-peak measurements were made using a resolution bandwidth RBW of 120 kHz and a video bandwidth VBW of 300 kHz. For frequencies above 1000MHz, peak and average measurements made with RBW and VBW of 1 MHz and 3MHz respectively.

The EUT was caused to generate a continuous carrier signal on the hopping channel.

Radiated spurious emissions were evaluated for 50.0kbps data rate (Sun Mode).

7.5.3.2 Measurement Results

Radiated spurious emissions found in the band of 30MHz to 10GHz are reported in the Table 7.5.3.2-1 below.

Table 7.5.3.2-1: Radiated Spurious Emissions Tabulated Data

Frequency (MHz)	Level (dBuV)		Antenna Polarity	Correction Factors		ted Level suV/m)		imit uV/m)		largin (dB)
(2)	pk	Qpk/Avg	(H/V)	(dB)	pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
Low Channel										
2706.6	50.41	43.48	Н	-3.77	46.64	39.71	74.0	54.0	27.4	14.3
2706.6	51.35	46.15	V	-3.77	47.58	42.38	74.0	54.0	26.4	11.6
3608.8	55.81	52.01	Н	-0.23	55.58	51.78	74.0	54.0	18.4	2.2
3608.8	54.58	50.62	V	-0.23	54.35	50.39	74.0	54.0	19.6	3.6
				Mid Channel						
2745	51.13	45.49	Н	-3.70	47.43	41.79	74.0	54.0	26.6	12.2
2745	51.87	45.97	V	-3.70	48.17	42.27	74.0	54.0	25.8	11.7
3660	52.74	47.80	Н	-0.03	52.71	47.77	74.0	54.0	21.3	6.2
3660	52.67	47.32	V	-0.03	52.64	47.29	74.0	54.0	21.4	6.7
				High Channel						
2783.4	51.04	46.05	Н	-3.62	47.42	42.43	74.0	54.0	26.6	11.6
2783.4	51.03	45.28	V	-3.62	47.41	41.66	74.0	54.0	26.6	12.3
3711.2	50.11	42.49	Н	0.16	50.27	42.65	74.0	54.0	23.7	11.3
3711.2	50.07	40.61	V	0.16	50.23	40.77	74.0	54.0	23.8	13.2

Model(s): DCIWR, IPIWR FCC ID: R7PIWRS4 IC: 5294A-IWRS4

7.5.3.3 Sample Calculation:

 $R_C = R_U + CF_T$

Where:

CF_T = Total Correction Factor (AF+CA+AG)-DC (Average Measurements Only)

R_U = Uncorrected Reading
R_C = Corrected Level
AF = Antenna Factor
CA = Cable Attenuation
AG = Amplifier Gain

DC = Duty Cycle Correction Factor

Example Calculation: Peak

Corrected Level: 50.41 - 3.77 = 46.64dBuV/m Margin: 74dBuV/m - 46.64dBuV/m = 27.4dB

Example Calculation: Average

Corrected Level: 43.48 - 3.77 - 0= 39.71dBuV Margin: 54dBuV - 39.71dBuV = 14.3dB

8 CONCLUSION

In the opinion of ACS, Inc. the DCIWR and IPIWR, manufactured by Cellnet Technology, Inc. meets the requirements of FCC Part 15 subpart C and Industry Canada's Radio Standards Specification RSS-210.

END REPORT