

## Application for

**US Code Title 47, Part 2, Subpart J, Section 2.947, Certification  
Per  
Part 15, Subpart C, for Intentional Radiators, Section 15.249, Intentional Radiator  
Operating within the Band 2400 MHz to 2483.5 MHz.**

And

**US Code Title 47, Part 2, Subpart J, Section 2.902, Verification  
Per  
Part 15, Subpart B, for Unintentional Radiators, section 15.101, 15.107 and 15.109**

For the

**Swirl Networks**

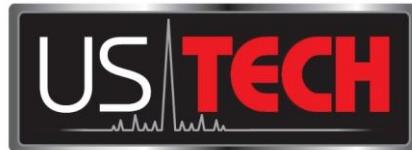
**Swirl  
Model: SW-24**

Manufactured by

**Swirl Networks**

**UST Project: 13-0294  
Test Date(s): November 5 - 15, 2013  
Issue Date: November 18, 2013**

**3505 Francis Circle Alpharetta, GA 30004  
PH: 770-740-0717 Fax: 770-740-1508  
www.ustech-lab.com**



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I certify that I am authorized to sign for the test facility and that all of the statements in this report and in the Exhibits attached hereto are true and correct to the best of my knowledge and belief:

**US TECH (Agent Responsible For Test):**

By: \_\_\_\_\_

A handwritten signature in black ink that reads "Alan Ghasiani".

**Name:** Alan Ghasiani

**Title:** Consulting Engineer - President

**Date:** November 18, 2013

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## MEASUREMENT/TECHNICAL REPORT

COMPANY NAME: Swirl Networks

MODEL(S): SW-24  
FCC ID: RMS0217642477  
IC ID: 10872A-SW24

DATE: November 10, 2013

This report concerns (check one): Original grant  Class II change

Equipment type: Intentional Radiator Operating within the bands 2400-2483.5 MHz

Deferred grant requested per 47 CFR 0.457(d) (1) (ii)? yes  No

If yes, defer until: \_\_\_\_\_  
date

N.A.  agrees to notify the Commission by N.A.  
date

of the intended date of announcement of the product so that the grant can be issued  
on that date.

Report prepared by:

US Tech  
3505 Francis Circle  
Alpharetta, GA 30004

Phone Number: (770) 740-0717  
Fax Number: (770) 740-1508

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## **SUMMARY OF TEST REQUIREMENTS**

<b>FCC Requirement</b>	<b>Title</b>	<b>Disposition</b>
15.205	Restricted Bands	Pass
15.207	Intentional Radiator Power Line Conducted Emissions	Pass
15.209	Intentional Radiator Radiated Emissions	Pass
15.249(a)	Fundamental Field Strength	Pass
15.107	Unintentional Radiator Power Line Conducted Emissions	N/A
15.109	Unintentional Radiator Radiated Emissions	Pass

N/A = Not applicable for this unit.

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#### **Appendix    Title**

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C	Letter of Confidentiality
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E	Block Diagram(s)
F	Schematic(s)
G	Test Configuration Photographs
H	External Photographs
I	Internal Photographs
J	Theory of Operation
K	User's Manual

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## 1 General Information

### 1.1 Purpose of this Report

This report is prepared as a means of presenting test data to be used by a Telecom Certification Body in determination of whether this product is permitted for unlicensed dissemination to the general public according to the FCC Rules and Regulations for RF Devices Intentional Radiators.

### 1.2 Product Description

The Equipment Under Test (EUT) is the Swirl Networks model SW-24 radio beacon. The EUT is an ISM band transceiver operating in the 2400-2483.5 MHz frequency band. Per 47 CFR Part 15.31(m) the EUT was evaluated at the low, middle and high channels for operation in this band. Test data for these channels is provided herein.

The EUT is a device micro-location positioning beacon.

### 1.3 Related Submittal(s)/Grant(s)

#### 1.3.1 The EUT is subject to the following FCC authorizations:

- a) Certification under section 15.249 as a transmitter.
- b) Verification under 15.101 as a digital device and receiver.

#### 1.3.2 Certification of the Transmitter

The EUT employs digital modulation, but is not being certified under CFR 15.247 because the field strength of the fundamental and its harmonics are within the limits specified in 47 CFR 15.249. Therefore the EUT is instead being presented under the requirements of CFR 15.249. The EUT will operate within the frequency band of 2400 MHz to 2483.5 MHz.

#### 1.3.3 Verification of the Digital apparatus

The Verification requirement shares many common report elements with the Certification report. Therefore, though this report is mostly intended to provide data for the Certification process, the Verification authorization report (part 15.107 and 109) for the EUT is included herein.

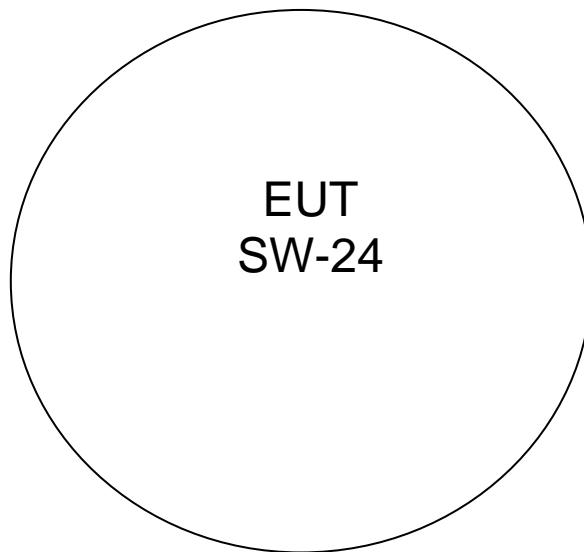
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## 2 Tests and Measurements

### 2.1 Configuration of Tested System

The sample was set up and tested per ANSI C63.4, Methods of Measurement from Low-Voltage Electrical and Electronic Equipment in the Frequency Range of 9 kHz to 40 GHz (2003). Conducted and radiated emissions data were taken with the EMC test receiver (or spectrum analyzer's) resolution bandwidth adjusted to 9 kHz and 120 kHz, respectively. All measurements are peak unless stated otherwise. The video filter associated with the spectrum analyzer was off throughout the evaluation process. A Block diagram of the tested system is shown in Figure 1. A listing of the EUT and its test peripherals is found in Table 1 below. Test configuration photographs for spurious and fundamental emissions measurements are in the attached appendices.



**Figure 1. Test Configuration**

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**Table 1 - EUT and Peripherals**

PERIPHERAL MANUFACTURER	MODEL NUMBER	SERIAL NUMBER	FCC ID:	CABLES P/D
Beacon device (EUT) Swirl Networks	SW-24	Engineering Sample	RMS0217642477	N/A
Batteries	CR2477	None	None	N/A

S= Shielded, U=Unshielded, P= Power line, D= Data line

## **2.2 EUT Characterization**

The sample used for testing was received by US Tech on October 23, 2013 in good operating condition.

## **2.3 Test Facility**

Testing was performed at US Tech's measurement facility at 3505 Francis Circle, Alpharetta, GA. This site has been fully described and registered with the FCC under site designation number 186022. Additionally this site has also been fully described and submitted to Industry Canada (IC), and has been approved under file number 2982A-1.

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## 2.4 Test Equipment

Table 2 describes test equipment used to evaluate this product.

**Table 2 - Test Instruments used for Evaluation**

TEST INSTRUMENT	MODEL NUMBER	MANUFACTURER	SERIAL NUMBER	DATE OF LAST CALIBRATION
SPECTRUM ANALYZER	8566B	HEWLETT-PACKARD	2648A13875	11/21/2012
SPECTRUM ANALYZER	8593E	HEWLETT-PACKARD	3205A00124	01/15/2013
RF PREAMP	8447D	HEWLETT-PACKARD	2944A06291	11/29/2012
LOOP ANTENNA	SAS-200/562	AH Systems	142	09/12/2013 2 yrs
BICONICAL ANTENNA	3110B	EMCO	9307-1708	07/02/2012 2 yrs
LOG PERIODIC	3146	EMCO	3110-3236	06/05/2012 2 yrs
HORN ANTENNA	SAS-571	AH Systems	605	07/23/2013 2 yrs
HORN ANTENNA	3116	HEWLETT-PACKARD	9505-2255	08/09/2012 2 yrs
PREAMP	8449B	HEWLETT-PACKARD	3008A00480	03/04/2013
CALCULATION PROGRAM	N/A	N/A	Ver. 6.0	N/A

**Note:** The calibration interval of the above test instruments is 12 months unless stated otherwise, and all calibrations are traceable to NIST/USA.

## 2.5 Modifications to EUT

No modifications were made by US Tech to bring the EUT into compliance with FCC Part 15, Subpart B, Class B Limits for the receiver and digital portion of the EUT or the Subpart C, Transmitter requirements.

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## 2.6 Measurement Standards (CFR 15.31)

Intentional and unintentional radiators are to use the methods of ANSI C63.4 – 2003. Measurements were made on an Open Area Test Site (OATS) wherever possible. For battery powered equipment, new (or fully charged) batteries are used. Section 15.31(m) indicates that if the EUT System operates over the 2400 MHz to 2483.5 MHz ISM band, measurements must be made near the bottom of the band (around 2400 MHz for example) and in the middle of the band (2440 MHz) as well as near the top of the band (2483.5 MHz).

## 2.7 Frequency Range of Radiated Measurements (CFR 15.33)

The frequency range is detailed below for intentional and unintentional radiators.

### 2.7.1 Frequency Range for Intentional Radiators

The spectrum was investigated from the lowest RF signal generated without going below 9 kHz to the 10<sup>th</sup> harmonic of the highest fundamental transmitter frequency.

### 2.7.2 Frequency Range for Unintentional Radiators

The spectrum was investigated from the lowest RF signal generated without going below the lowest frequency for which an emissions limit is specified (30 MHz) to the 5<sup>th</sup> harmonic of the highest fundamental frequency of the digital device (12.5 GHz maximum).

### 2.7.3 Measurement Detector Function and Bandwidth (CFR 15.35)

On any frequency below 1000 MHz, the limits shown are based upon measuring equipment employing a CISPR quasi-peak detector function and related measurement bandwidths. On frequencies above 1000 MHz, the radiation limits are based upon the use of measuring instrumentation employing an average detector function.

When average detector measurements are specified for use, including emission measurements below 1000 MHz, there is also a corresponding limit for Peak detector measurements having a limit of 20 dB above the corresponding average limit unless a different peak emission limit is specified. Measurements above 1000 MHz utilize a minimum resolution bandwidth of 1 MHz.

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When radiated emissions limits are expressed in terms of the average value of the emission and pulsed operation is employed, the measurement field strength is determined by averaging over one complete pulse train (Duty Cycle) including blanking intervals for pulse trains up to 0.1 second in duration. The exact method of calculating the average field strength is included in paragraph 2.11 of this report. Refer to Figures 2 for duty cycle measurement data.

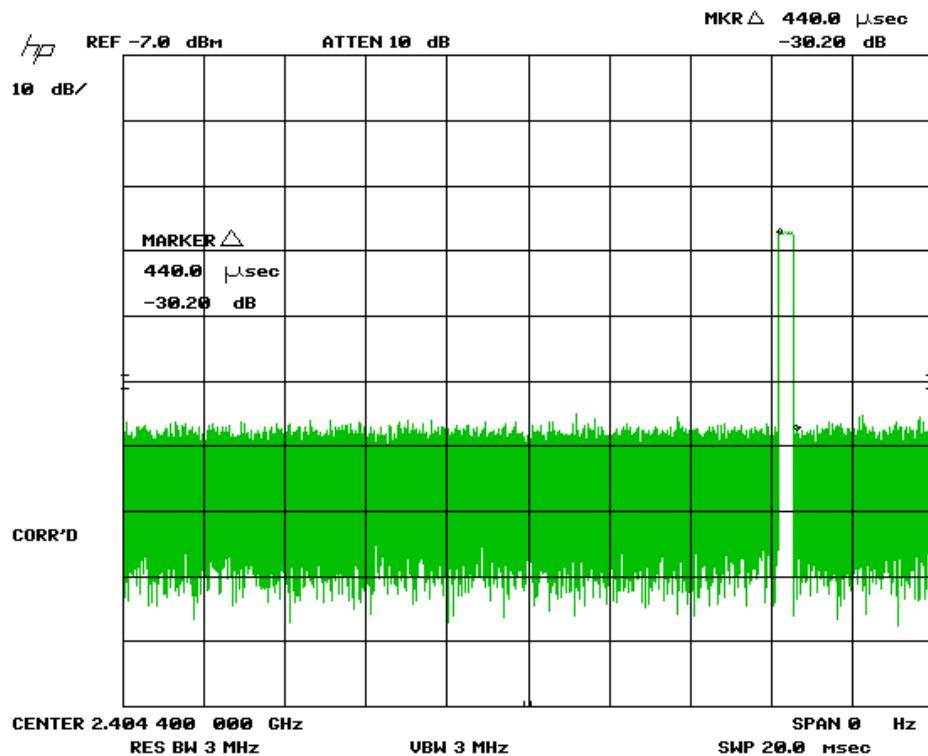
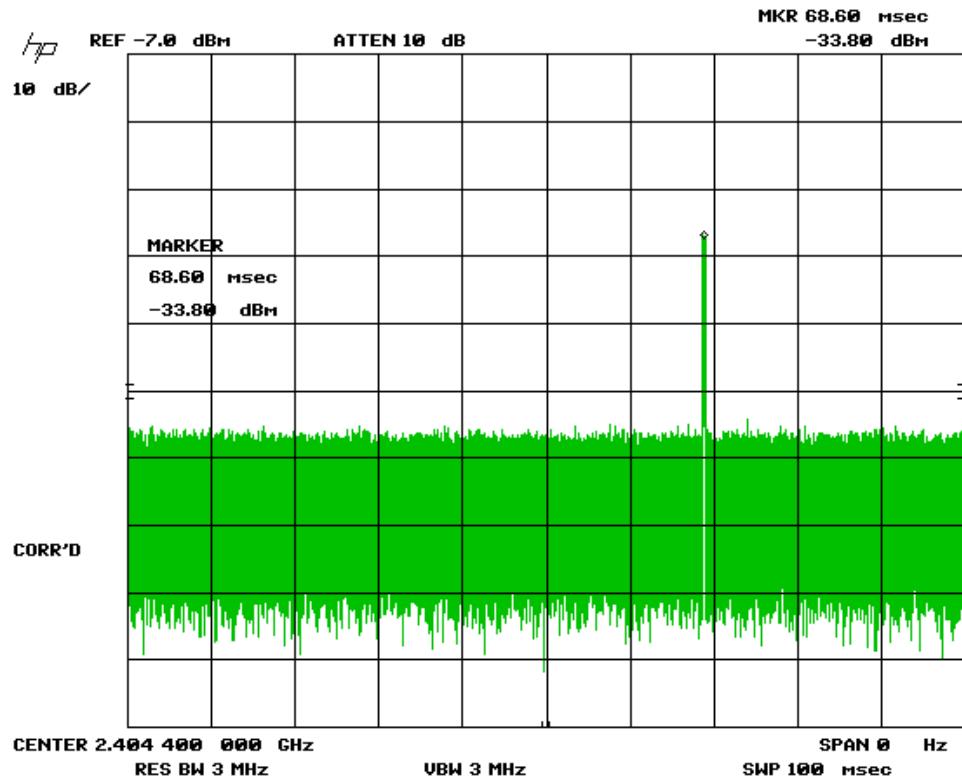


Figure 2. Transmitter Pulse Width (20ms)

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**Figure 3. Transmitter Pulse Width (100ms)**

$$(.44\text{mS})/100\text{mS} = 0.0042 = 0.42\% \text{ percent}$$

$$\text{Duty Cycle} = 20 \log (0.0044) = \boxed{-47.13 \text{ dB}}$$

The Duty Cycle applied in this test report is -20 dB.

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## 2.8 Antenna Requirement (CFR 15.203)

The EUT has an internal radiator; there are no external antenna ports.

**Table 3 - Allowed Antenna(s)**

MANUFACTURER	TYPE OF ANTENNA	MODEL	REPORT REFERENCE	GAIN dB <sub>i</sub>	TYPE OF CONNECTOR
Swirl Networks	Meandered Inverted F	Engineering Sample	Antenna	5.3	PCB Trace Antenna

## 2.9 Intentional Radiator, Power Line Conducted Emissions (CFR 15.207)

The EUT requires 3.0VDC to operate. The EUT is powered by one, CR2477 coin battery.

## 2.10 Intentional Radiator, Radiated Emissions (CFR 15.249 (a), (e))

The EUT was placed into a continuous transmit mode of operation. A preliminary scan was performed on the EUT to find signal frequencies that were caused by the transmitter part of the product and to obtain the worse case result the EUT tested in all X, Y and Z axis. Radiated measurements below 30 MHz were tested with a RBW = 9 kHz; emissions below 1 GHz were tested with a RBW = 120 kHz and radiated measurements above 1 GHz were measured using a RBW = 1 MHz and VBW = 3 MHz.

Test data is found in Tables 4 and 5 below.

## 2.11 Restricted Bands of Operation (CFR 15.205)

Only radiated harmonics and other spurious signals can be permitted to fall into the restricted bands of 15.205. All signals found in paragraph 2.7 above shall be examined for this requirement. Limits are based upon the limits of paragraph 15.209. Above 1 GHz, the limits are for Average value. See Tables 4 and 5 below for peak and Average measurements. According to CFR 15.35, the peak limits can exceed the average limits by 20 dB.

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**Table 4 - Peak Fundamental and Harmonics, (CFR15.249 (a))**

<b>Radiated Fundamental and Harmonics Emissions</b>									
Tested By: JCW	Test: Fundamental and Harmonics CFR 15.249 (a)				Client: Swirl Networks				
	Project: 13-0294	Class: N/A	Model: SW-24						
Frequency (MHz)	Test Data (dBuV)	DF+FL* (dB/m)	AF+CL-PA (dB/m)	Corrected Results (dBuV/m)	Peak Limits (dBuV/m)	Distance / Polarity (Meters)	Margin (dB)	Det PK	
2401.97	69.71	-9.5	-7.95	52.26	114	3m/Vert	62.1	PK	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									
2425.88	64.52	-9.5	-7.95	46.98	114	3m/Vert	67.0	PK	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									
2479.88	68.95	-9.5	-7.95	51.50	114	3m/Vert	62.5	PK	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									

-Emissions were investigated up to the 10<sup>th</sup> harmonic of the highest frequency generated.

-All other emissions were at least 20 dB below the applicable limit.

\*measurements at 1 meter were extrapolated to 3 meter using a factor of -9.5 dB.

SAMPLE CALCULATION: at 2401.97 MHz, = 69.71 dBuV +(-9.5) + (-8.27) dB/m = 52.26 dBuV/m @ 3m

Test Date: November 12, 2013

Tested by

Signature: John C. Wynn Name: John C. Wynn

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**Table 5 - Fund and Harmonics Average limits, (CFR 15.35(b), 15.249(a))**

<b>Radiated Fundamental and Harmonics Emissions</b>									
Tested By: JCW	Test: Fundamental and Harmonics CFR 15.249 (a)				Client: Swirl Networks				
	Project: 13-0294		Class: N/A		Model: SW-24				
Frequency (MHz)	Test Data (dBuV)	DF+FL	AF+CL- PA+DC (dB/m)	Corrected Results (dBuV/m)	Limits (dBuV/m)	Distance / Polarity (Meters)	Margin (dB)	Det AVG	
2401.97	69.71	-9.5	-7.95	52.26	94	3m/Vert	42.1	<b>AVG</b>	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									
2425.88	64.52	-9.5	-7.95	46.98	94	3m/Vert	47.0	<b>AVG</b>	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									
2479.88	68.95	-9.5	-7.95	51.50	94	3m/Vert	42.5	<b>AVG</b>	
<b>No harmonic emissions detected greater than 20 dB from the limit.</b>									

-Emissions were investigated up to the 10<sup>th</sup> harmonic of the highest frequency generated.

-All other emissions were at least 20 dB below the applicable limit.

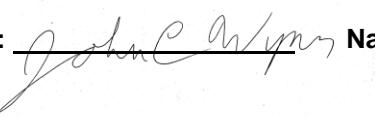
\*measurements at 1 meter were extrapolated to 3 meter using a factor of -9.5 dB.

\*duty cycle factor = -20 dB was not used

SAMPLE CALCULATION: at 2401.97 MHz, = 69.71 dBuV + (-9.5) + (-7.95) dB/m = 52.26 dBuV/m @ 3m

Test Date: November 12, 2013

Tested by

Signature:  Name: John C. Wynn

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## 2.13 20 dB Bandwidth Measurement per CFR 15.247, 99% Occupied Bandwidth (IC RSS 210, A8.1)

The EUT antenna port was connected to a spectrum analyzer having a  $50\ \Omega$  input impedance. Measurements were performed similar to the method of FCC, KDB Publication No. 558074 for a bandwidth of 20 dB. The RBW was set to approximately 1/100 of the manufacturers claimed RBW and with the VBW  $\geq$  RBW. The results of this test are given in Table 6 and Figures 4-6.

**Table 6 - 20 dB Bandwidth and 99% Occupied Bandwidth**

Frequency (MHz)	20 dB Bandwidth (MHz)	99% Occupied Bandwidth (MHz)
2401.75	3.736	3.736
2426.13	3.832	3.832
2479.77	3.808	3.808

Test Date: November 5, 2013

Tested By  
Signature:

Name: John C. Wynn

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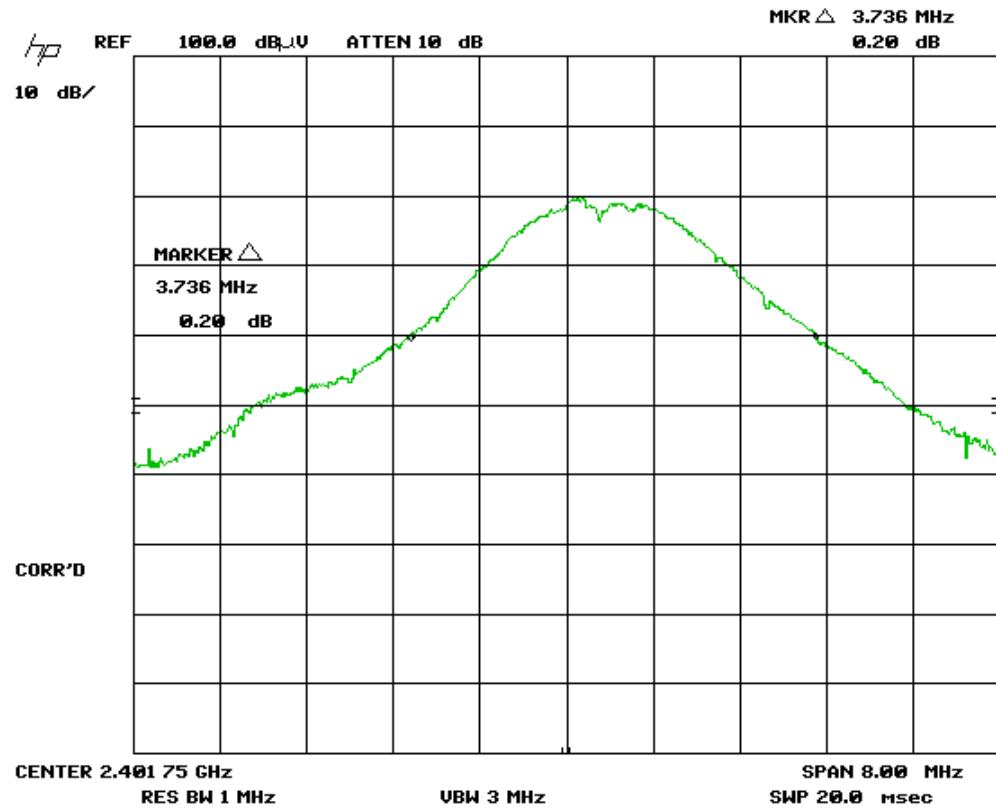
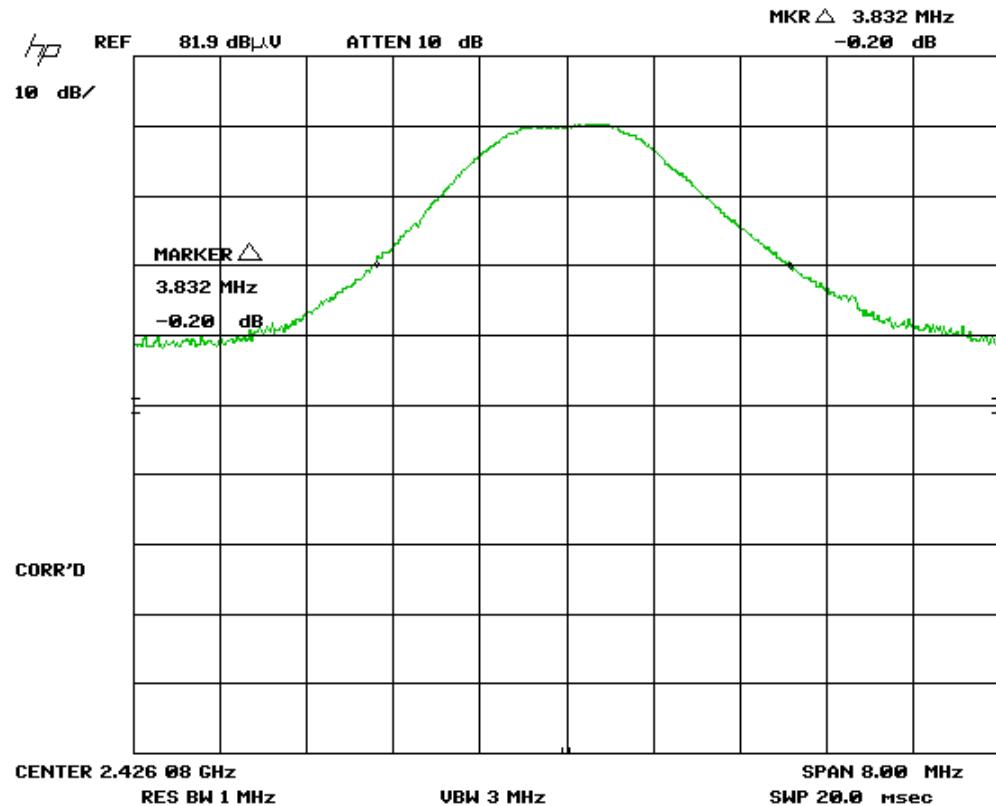


Figure 4. Low Ch Bandwidth

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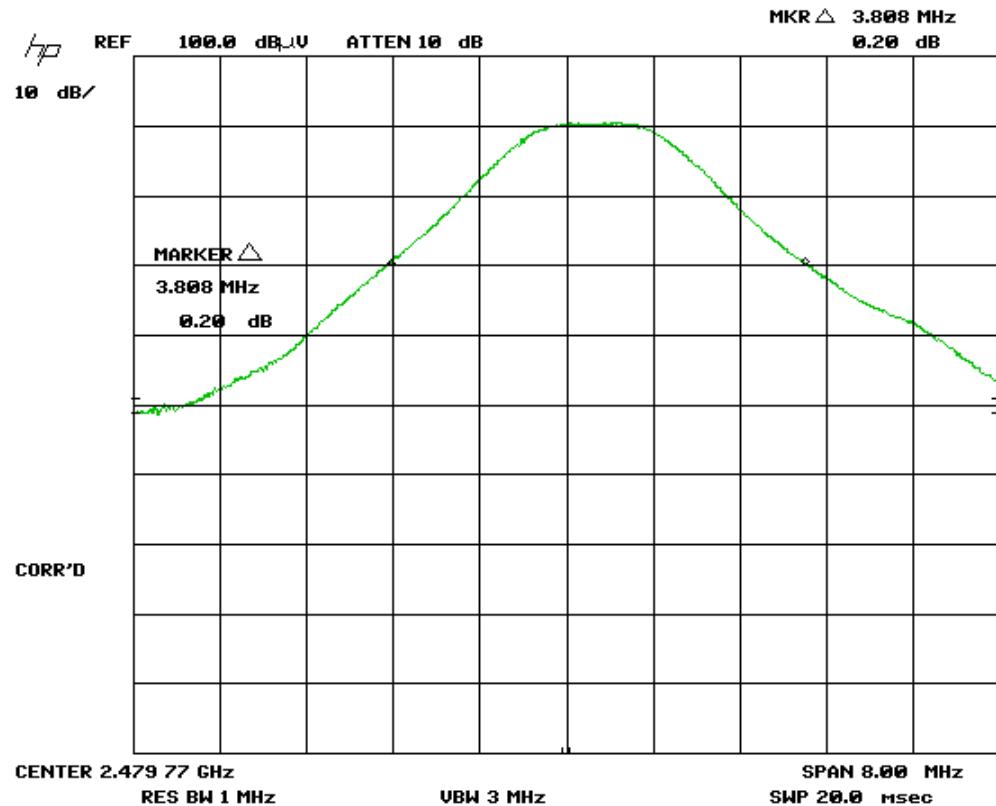
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**Figure 5. Mid Ch Bandwidth**

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**Figure 6. High Ch Bandwidth**

## 2.12 Band Edge Measurements (CFR15.249(d))

Band Edge measurements were made at a Low Channel and High Channel peak at highest EUT related emission outside the upper and lower occupied bandwidth. A measurement was made of the fundamental and the emission was measured using a quasi peak setting. A Resolution Bandwidth of  $> 1\%$  of the emission bandwidth was used. This procedure was repeated for the high channel. The limits were derived as described in the following sections.

### 2.12.1 High Band Edge

Above 2483.5 MHz the limit per section 15.249(d) is 20 dB below the fundamental or the value expressed by CFR 15.209 (46 dBuV/m) whichever is the lesser attenuation.

The High Channel fundamental recorded in Table 4 is 68.95 dBuV/m:  
 $68.95 - 51.70 = 17.25$ ; Passing Margin=  $46 - 17.25 = 28.75$  dB

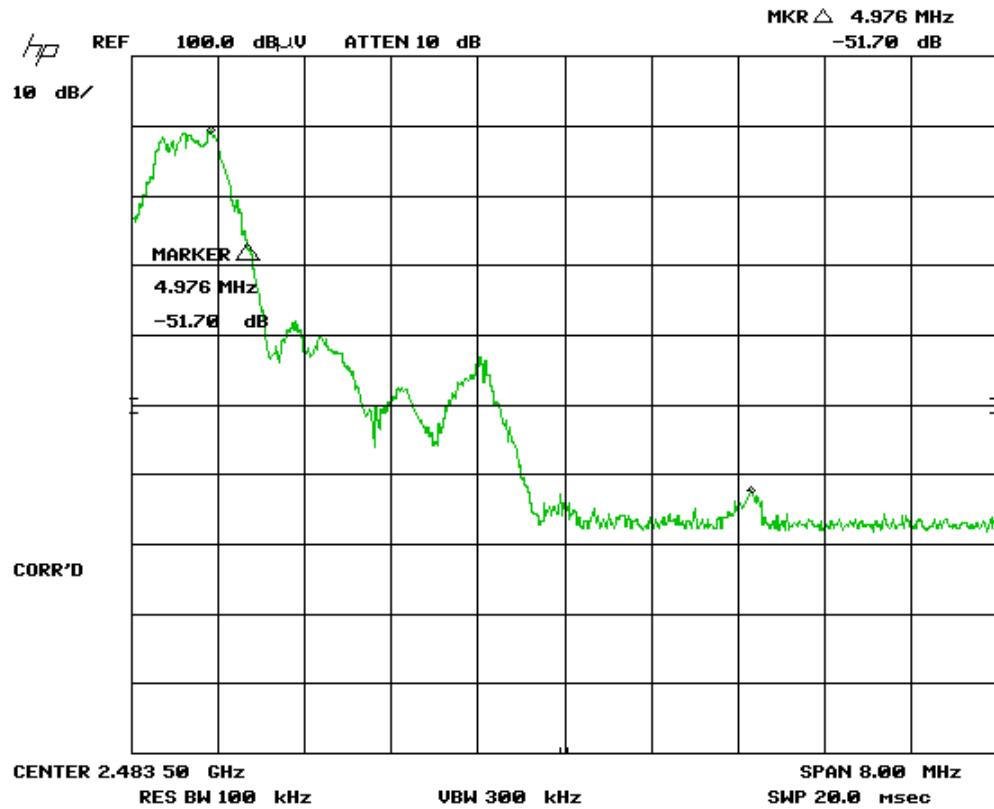


Figure 7. Radiated Band Edge – High Channel Delta

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## 2.12.2 Low Band Edge

The low channel fundamental recorded in Table 4 is 69.71dB<sub>UV</sub>/m  
 $69.71 - 31.3 = 38.41$  dB; Passing Margin=  $46 - 38.41 = 7.59$  dB

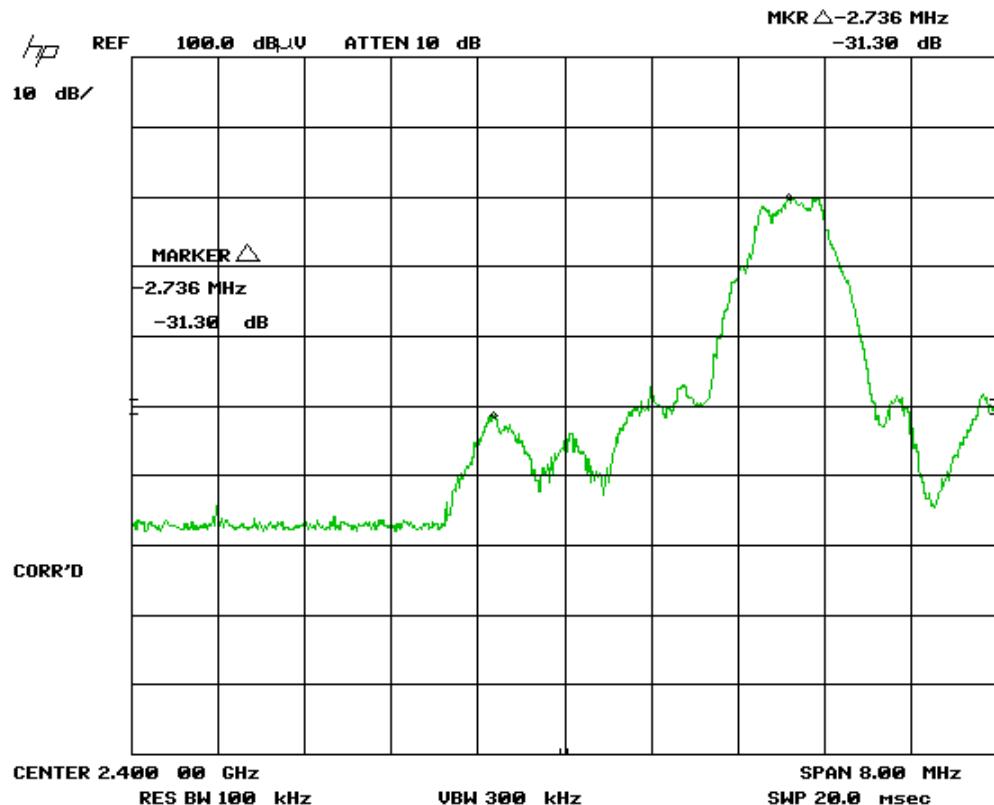


Figure 8. Radiated Band Edge – Low Channel Delta

US Tech FCC Part 15.249/ RSS 210  
 Test Report: 13-0294  
 Date: November 18, 2013  
 Model(s): SW-24  
 FCC ID: RMS0217642477  
 IC: 10872A-SW24  
 Customer: Swirl Networks

## 2.13 Unintentional Radiator, Power Conducted Emissions (CFR 15.107)

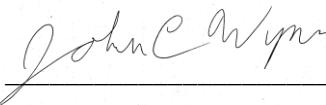
The EUT is battery operated.

**Table 7 - Power line Conducted Emissions Data, Class B**

Power Line Conducted Emissions							
Test By: JW	Test: FCC Power Line Conducted Emissions 150 KHz – 30 MHz , Hot Phase			Client: Swirl Networks			
	Project: 13-0294	Sect. 15.107/15.207 Class: A		Model: SW-24			
Frequency (MHz)	Test Data (dBuV)	IL+CL -PA (dB)	Results (dBuV)	AVG Limits (dBuV)	Phase /Neutral	Margin (dB)	PK /QP
EUT is battery operated and does not connect to the AC mains. This test is not applicable.							

### SAMPLE CALCULATIONS:

Test Date: November 8, 2013

Tested by   
Signature:

Name: John C. Wynn

US Tech  
Test Report:  
Date:  
Model(s):  
FCC ID:  
IC:  
Customer:

FCC Part 15.249/ RSS 210  
13-0294  
November 18, 2013  
SW-24  
RMS0217642477  
10872A-SW24  
Swirl Networks

## 2.14 Unintentional Radiator, Radiated Emissions (CFR 15.109)

Radiated emissions within the band 9 KHz (or lowest clock frequency of the EUT) to 30 MHz and 30 MHz to 12.5 GHz were measured with a spectrum analyzer via a pre-amplifier by connecting the spectrum analyzer to a receiving antenna spaced three (3) meters from the EUT. The spectrum analyzer was set for a  $50\ \Omega$  input impedance with the VBW set to  $\geq$  the RBW bandwidth. The antenna was raised and lowered over a span of 4 meters in order to maximize the signal coming from the EUT. Similarly, the turntable was rotated through 360 degrees in the same maximizing effort. Also the EUT was scanned for a maximum radiated power when placed in each of the three mutually exclusive orthogonal planes.

Radiated emissions within the band of 9 kHz to 30 MHz were investigated using a calibrated Loop Antenna and per the requirements of ANSI C63.4:2003. The resolution bandwidth was set to 9 kHz, the video bandwidth was set to three times the resolution bandwidth.

For measurements above 30 MHz the measurements were made with the analyzer's resolution bandwidth set to 120 kHz for measurements made below 1 GHz and 1 MHz for measurements made above 1 GHz. The video bandwidth was set to three times the resolution bandwidth.

All measured signals were at least 6 db below the specification limit. The results of the measurements are reported in the tables below.

US Tech  
Test Report:  
Date:  
Model(s):  
FCC ID:  
IC:  
Customer:

FCC Part 15.249/ RSS 210  
13-0294  
November 18, 2013  
SW-24  
RMS0217642477  
10872A-SW24  
Swirl Networks

**Table 8 - Unintentional Radiator, Peak Radiated Emissions (CFR 15.109)**

<b>Peak Radiated Emissions, Digital Device and Receiver</b>							
Tested By: J.W.	Test: Radiated Emissions- 30 kHz to 12.5 GHz			Client: Swirl Networks			
	Project: 13-0294	Requirement 15.109 Class: B		Model: SW-24			
Frequency (MHz)	Test Data (dBuV)	AF+CL-PA (dB)	Results (dBuV/m)	QP Limits (dBuV/m)	Distance / Polarity (meters)	Margin (dB)	Detector PK / QP
50.9400	46.10	-17.32	28.78	40.0	3m/Vert	11.2	PK
97.1250	40.10	-17.80	22.30	43.5	3m/hor	21.2	PK
190.9470	35.90	-11.82	24.08	43.5	3m//hor	19.4	PK
221.1550	35.00	-9.97	25.03	46.0	3m/hor	21.0	PK
707.9000	46.00	-5.84	40.16	46.0	3m/hor	5.8	PK
783.2100	31.30	-6.75	24.55	46.0	3m/Vert	21.5	PK

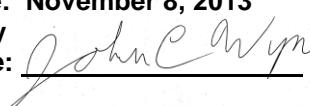
Tested from 30 kHz to 12.5 GHz.

No other emissions found more than 20 dB from the limit.

SAMPLE CALCULATION: at 221.155 MHz, = 35.0 dBuV + (-9.97) dB/m = 25.03 dBuV/m @ 3m

Test Date: November 8, 2013

Tested by

Signature:  Name: John Wynn

**Note: this data presented here to show the EUT and host complies with the Verification requirements of Part 15.109 as an unintentional digital device.**

US Tech  
Test Report:  
Date:  
Model(s):  
FCC ID:  
IC:  
Customer:

FCC Part 15.249/ RSS 210  
13-0294  
November 18, 2013  
SW-24  
RMS0217642477  
10872A-SW24  
Swirl Networks

## 2.15 Measurement Uncertainty

The measurement uncertainties given were calculated using the method detailed in CISPR 16-4. A coverage factor of  $k=2$  was used to give a level of confidence of approximately 95%.

### 2.15.1 Conducted Emissions Measurement Uncertainty

Measurement Uncertainty (within a 95% confidence level) for this test is  $\pm 2.8$  dB.

The EUT is battery operated. This test was not applicable.

### 2.15.2 Radiated Emissions Measurement Uncertainty

For a measurement distance of 3 m the measurement uncertainty (with a 95% confidence level) for this test using a Biconical Antenna (30 MHz to 200 MHz) is  $\pm 5.3$  dB. This value includes all elements of measurement.

The measurement uncertainty (with a 95% confidence level) for this test using a Log Periodic Antenna (200 MHz to 1000 MHz) is  $\pm 5.1$  dB.

The measurement uncertainty (with a 95% confidence level) for this test using a Horn Antenna is  $\pm 2.45$  dB.

The data listed in this test report does have sufficient margin to negate the effects of uncertainty. Therefore, the EUT unconditionally meets this requirement.