



MET Laboratories, Inc.

Safety Certification - EMI - Telecom Environmental Simulation

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February 22, 2011

LifeShield, Inc.
1255 Drummers Lane, Suite 100
Wayne, PA 19087

Dear Louis Stilp,

Enclosed is the EMC Wireless test report for compliance testing of the LifeShield, Inc., Base, Model # BSC1001 as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15, Subpart B for a Class B Digital Device and FCC Part 15 Subpart C for Intentional Radiators.

Thank you for using the services of MET Laboratories, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
MET LABORATORIES, INC.

Jennifer Warnell
Documentation Department

Reference: (\LifeShield, Inc.\EMC30582-FCC247)

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Electromagnetic Compatibility Criteria Test Report

for the

**LifeShield, Inc.
Base, Model # BSC1001**

Tested under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B for Class B Digital Devices
&
15.247 Subpart C for Intentional Radiators

MET Report: EMC30582-FCC247

February 22, 2011

Prepared For:

**LifeShield, Inc.
1255 Drummers Lane, Suite 100
Wayne, PA 19087**

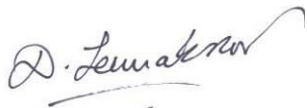
Prepared By:
MET Laboratories, Inc.
914 W. Patapsco Ave
Baltimore, MD 21230

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Base, Model # BSC1001**

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contained in
Title 47 of the CFR, Parts 15 Subpart B for Class B Digital Devices
&
15.247 Subpart C for Intentional Radiators



Dusmantha Tennakoon, Project Engineer
Electromagnetic Compatibility Lab



Jennifer Warnell
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Parts 15B, 15.247 under normal use and maintenance.



Shawn McMillen,
Wireless Manager, Electromagnetic Compatibility Lab

Report Status Sheet

| Revision | Report Date | Reason for Revision |
|----------|-------------------|---------------------|
| Ø | February 22, 2011 | Initial Issue. |

Table of Contents

| | | |
|-------------|---|-----------|
| I. | Executive Summary | 1 |
| | A. Purpose of Test | 2 |
| | B. Executive Summary | 2 |
| II. | Equipment Configuration | 3 |
| | A. Overview..... | 4 |
| | B. References..... | 5 |
| | C. Test Site | 5 |
| | D. Description of Test Sample..... | 6 |
| | E. Equipment Configuration..... | 8 |
| | F. Support Equipment | 8 |
| | G. Ports and Cabling Information..... | 8 |
| | H. Mode of Operation..... | 8 |
| | I. Method of Monitoring EUT Operation..... | 9 |
| | J. Modifications | 9 |
| | a) Modifications to EUT..... | 9 |
| | b) Modifications to Test Standard..... | 9 |
| | K. Disposition of EUT | 9 |
| III. | Electromagnetic Compatibility Criteria for Unintentional Radiators | 10 |
| | § 15.107(a) Conducted Emissions Limits..... | 11 |
| | § 15.109(a) Radiated Emissions Limits..... | 15 |
| IV. | Electromagnetic Compatibility Criteria for Intentional Radiators..... | 18 |
| | § 15.203 Antenna Requirement | 19 |
| | § 15.207(a) Conducted Emissions Limits..... | 20 |
| | § 15.247(a)(1) 20 dB Occupied Bandwidth..... | 24 |
| | § 15.247(a)(1) Average Time of Occupancy (Dwell Time) | 28 |
| | § 15.247(a)(1) Number of RF Channels | 30 |
| | § 15.247(b) Fundamental Field Strength | 31 |
| | § 15.247(d) Radiated Spurious Emissions Requirements and Band Edge | 34 |
| | § 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge | 45 |
| | § 15.247(g)(h) Declaration Statements for FHSS..... | 46 |
| V. | Test Equipment | 48 |
| VI. | Certification & User's Manual Information..... | 50 |
| | A. Certification Information | 51 |
| | B. Label and User's Manual Information | 55 |

List of Tables

| | |
|---|----|
| Table 1. Executive Summary of EMC Part 15.247 Compliance Testing | 2 |
| Table 2. EUT Summary Table..... | 4 |
| Table 3. References | 5 |
| Table 4. Equipment Configuration..... | 8 |
| Table 5. Support Equipment..... | 8 |
| Table 6. Ports and Cabling Information | 8 |
| Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a) | 11 |
| Table 8. Conducted Emissions - Voltage, AC Power, Phase Line (120 VAC, 60 Hz)..... | 12 |
| Table 9. Conducted Emissions - Voltage, AC Power, Neutral Line (120 VAC, 60 Hz)..... | 13 |
| Table 10. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b) | 15 |
| Table 11. Radiated Emissions Limits, Test Results, 30 MHz – 1 GHz..... | 16 |
| Table 12. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a) | 20 |
| Table 13. Conducted Emissions, 15.207(a), Phase Line, Test Results..... | 21 |
| Table 14. Conducted Emissions, 15.207(a), Neutral Line, Test Results | 22 |
| Table 15. EIRP, Test Results..... | 32 |
| Table 16. Restricted Bands of Operation..... | 34 |
| Table 17. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a) | 35 |
| Table 18. Radiated Spurious Emissions, Test Results..... | 36 |
| Table 19. Test Equipment List | 49 |

List of Plots

| | |
|---|----|
| Plot 1. Conducted Emission, Phase Line Plot | 12 |
| Plot 2. Conducted Emission, Neutral Line Plot..... | 13 |
| Plot 3. Radiated Emissions, Pre-Scan, 30 MHz - 1 GHz..... | 16 |
| Plot 4. Conducted Emissions, 15.207(a), Phase Line | 21 |
| Plot 5. Conducted Emissions, 15.207(a), Neutral Line | 22 |
| Plot 6. 20 dB Occupied Bandwidth, Low Channel..... | 25 |
| Plot 7. 20 dB Occupied Bandwidth, Mid Channel | 25 |
| Plot 8. 20 dB Occupied Bandwidth, High Channel | 25 |
| Plot 9. Channel Separation, Low Channel..... | 26 |
| Plot 10. Channel Separation, Mid Channel | 26 |
| Plot 11. Channel Separation, High Channel | 27 |
| Plot 12. No. of Times Channel Repeats | 29 |
| Plot 13. Dwell Time | 29 |
| Plot 14. Number of RF Channels, Part 1 | 30 |
| Plot 15. Number of RF Channels, Part 2 | 30 |
| Plot 16. Fundamental Field Strength, Low Channel..... | 33 |
| Plot 17. Fundamental Field Strength, Mid Channel | 33 |
| Plot 18. Fundamental Field Strength, High Channel..... | 33 |
| Plot 19. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz..... | 37 |
| Plot 20. Radiated Spurious Emissions, Low Channel, 18 GHz – 25 GHz | 37 |
| Plot 21. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz | 38 |
| Plot 22. Radiated Spurious Emissions, Mid Channel, 18 GHz – 25 GHz | 38 |
| Plot 23. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz | 39 |
| Plot 24. Radiated Spurious Emissions, High Channel, 18 GHz – 25 GHz | 39 |
| Plot 25. Radiated Restricted Band Edge, Average, 2310 – 2390 MHz | 40 |
| Plot 26. Radiated Restricted Band Edge, Peak, 2310 – 2390 MHz | 40 |
| Plot 27. Radiated Restricted Band Edge, Delta | 41 |

| | |
|---|----|
| Plot 28. Radiated Restricted Band Edge, High Channel Fundamental, Average | 42 |
| Plot 29. Radiated Restricted Band Edge, High Channel Fundamental, Peak | 42 |

List of Figures

| | |
|--|---|
| Figure 1. Block Diagram of Test Configuration..... | 7 |
|--|---|

List of Photographs

| | |
|---|----|
| Photograph 1. LifeShield, Inc. Base, Model # BSC1001 | 6 |
| Photograph 2. Conducted Emissions, Test Setup without Radio | 14 |
| Photograph 3. Radiated Emission, Test Setup..... | 17 |
| Photograph 4. Conducted Emissions, 15.207(a), Test Setup..... | 23 |
| Photograph 5. Radiated Spurious Emissions, Test Setup | 44 |
| Photograph 6. Radiated Spurious Emissions, Test Setup, Above 18 GHz | 44 |

List of Terms and Abbreviations

| | |
|--------------------------|---|
| AC | Alternating Current |
| ACF | Antenna Correction Factor |
| Cal | Calibration |
| <i>d</i> | Measurement Distance |
| dB | Decibels |
| dB_μA | Decibels above one microamp |
| dB_μV | Decibels above one microvolt |
| dB_μA/m | Decibels above one microamp per meter |
| dB_μV/m | Decibels above one microvolt per meter |
| DC | Direct Current |
| E | Electric Field |
| DSL | Digital Subscriber Line |
| ESD | Electrostatic Discharge |
| EUT | Equipment Under Test |
| <i>f</i> | Frequency |
| FCC | Federal Communications Commission |
| GRP | Ground Reference Plane |
| H | Magnetic Field |
| HCP | Horizontal Coupling Plane |
| Hz | Hertz |
| IEC | International Electrotechnical Commission |
| kHz | kilohertz |
| kPa | kilopascal |
| kV | kilovolt |
| LISN | Line Impedance Stabilization Network |
| MHz | Megahertz |
| μH | microhenry |
| μ | microfarad |
| μ s | microseconds |
| NEBS | Network Equipment-Building System |
| PRF | Pulse Repetition Frequency |
| RF | Radio Frequency |
| RMS | Root-Mean-Square |
| TWT | Traveling Wave Tube |
| V/m | Volts per meter |
| VCP | Vertical Coupling Plane |

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the LifeShield, Inc. Base, Model # BSC1001, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the Base, Model # BSC1001. LifeShield, Inc. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the Base, Model # BSC1001, has been **permanently** discontinued.

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with LifeShield, Inc., purchase order number NRE20110107-1. All tests were conducted using measurement procedure ANSI C63.4-2003.

| FCC Reference 47 CFR Part 15.247:2005 | Description | Compliance |
|---|--|--------------------|
| 47 CFR Part 15.107 (a) | Conducted Emission Limits for a Class B Digital Device | Compliant |
| 47 CFR Part 15.109 (a) | Radiated Emission Limits for a Class B Digital Device | Compliant |
| Title 47 of the CFR, Part 15 §15.203 | Antenna Requirement | Compliant |
| Title 47 of the CFR, Part 15 §15.207(a) | Conducted Emission Limits | Compliant |
| Title 47 of the CFR, Part 15 §15.247(a)(1) | 20 dB Occupied Bandwidth | Compliant |
| Title 47 of the CFR, Part 15 §15.247(a)(1)(iii) | Average Time of Occupancy (Dwell Time) | Compliant |
| Title 47 of the CFR, Part 15 §15.247(a)(1) | Number of RF Channels | Compliant |
| Title 47 of the CFR, Part 15 §15.247(a)(1) | RF Channel Separation | Compliant |
| Title 47 of the CFR, Part 15 §15.247(b)(1) | Peak Power Output | Compliant |
| Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205 | Radiated Spurious Emissions | Compliant |
| Title 47 of the CFR, Part 15 §15.247(d) | Spurious Conducted Emissions | Not Applicable |
| Title 47 of the CFR, Part 15 §15.247(g) & (h) | Declaration Statements for FHSS | Client Declaration |
| Title 47 of the CFR, Part 15 §15.247(i) | Maximum Permissible Exposure (MPE) | Compliant |

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by LifeShield, Inc. to perform testing on the Base, Model # BSC1001, under LifeShield, Inc.'s purchase order number NRE20110107-1.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the LifeShield, Inc., Base, Model # BSC1001.

The results obtained relate only to the item(s) tested.

| | |
|----------------------------|---|
| Model(s) Tested: | Base, Model # BSC1001 |
| Model(s) Covered: | Base, Model # BSC1001 |
| EUT Specifications: | Primary Power: 120 VAC, 60 Hz |
| | FCC ID: S9PBSC1001 |
| | Type of Modulations: GFSK |
| | Equipment Code: DSS |
| | Peak RF Output Power: 20.2 mW |
| Analysis: | EUT Frequency Ranges: 2401 – 2483 MHz |
| | The results obtained relate only to the item(s) tested. |
| | Temperature: 15-35° C |
| | Relative Humidity: 30-60% |
| | Barometric Pressure: 860-1060 mbar |
| Evaluated by: | Dusmantha Tennakoon |
| Report Date(s): | February 22, 2011 |

Table 2. EUT Summary Table

B. References

| | |
|-----------------------------------|---|
| CFR 47, Part 15, Subpart C | Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies |
| CFR 47, Part 15, Subpart B | Electromagnetic Compatibility: Criteria for Radio Frequency Devices |
| ANSI C63.4:2003 | Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz |
| ANSI/NCSL Z540-1-1994 | Calibration Laboratories and Measuring and Test Equipment - General Requirements |
| ANSI/ISO/IEC 17025:2000 | General Requirements for the Competence of Testing and Calibration Laboratories |
| ANSI C63.10-2009 | American National Standard for Testing Unlicensed Wireless Devices |

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 914 W. Patapsco Ave., Baltimore, MD 21230. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 3 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

D. Description of Test Sample

The LifeShield, Inc. Base, Model # BSC1001, Equipment Under Test (EUT), is part of a home security system that connects to internet and phone line. The EUT receives 345 MHz sensor transmissions and uses 2.4GHz FHSS protocol to talk to other units. This is a new revision of an existing product - FCC label S9PBSC1000.



Photograph 1. LifeShield, Inc. Base, Model # BSC1001

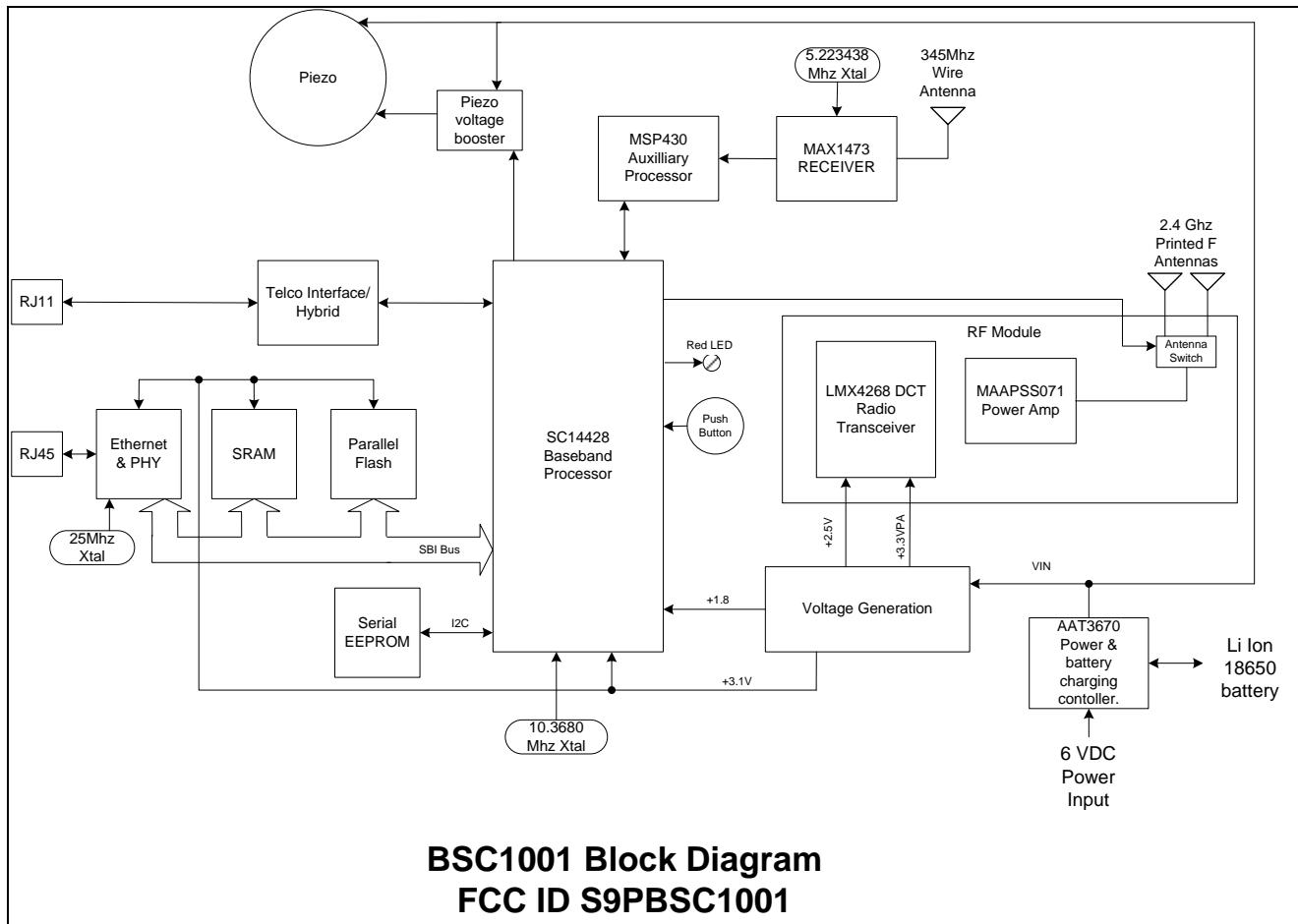


Figure 1. Block Diagram of Test Configuration

E. Equipment Configuration

The EUT was set up as outlined in Figure 1, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

| Ref. ID | Name / Description | Model Number | Serial Number |
|---------|--------------------|--------------|---------------|
| N/A | Base | BSC1001 | N/A |
| N/A | Wall power adapter | PSC0101 | N/A |

Table 4. Equipment Configuration

F. Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

| Ref. ID | Name / Description | Manufacturer | Model Number | Serial Number |
|---------|--------------------------------|--------------|--------------|---------------|
| N/A | Console | LifeShield | KPC1000 | N/A |
| N/A | Sensor | LifeShield | SNC1000 | N/A |
| N/A | Ethernet router & power supply | DLINK | DI-804HV | N/A |
| N/A | Power Supply for Console | N/A | PSC0101 | N/A |

Table 5. Support Equipment

G. Ports and Cabling Information

| Ref. ID | Port Name on EUT | Cable Description | Qty. | Length (m) | Shielded (Y/N) | Termination Point |
|---------|------------------|----------------------|------|------------|----------------|-------------------|
| | RJ11 | Telephone line cable | 1 | | | |
| | RJ45 | Ethernet cable | 1 | | | |

Table 6. Ports and Cabling Information

H. Mode of Operation

The Base is one component of a Home Security System. For the purposes of testing, it is being sent with 2 other components - Console (BSC1000) & Sensor (SNC1000). These three components have been "registered" together prior to being sent, and together they comprise a very basic system, such as a user might have in their home. Actually, the most basic system could consist of just the BSC1001 and a sensor. We included the Console because it has an LCD display which provides visual feedback for user operation. The system has been set up such that the Base is the FP of the system.

The Base & Console are referred to as Grid Controller (GC) devices. GC devices communicate with each other via their 2.4Ghz transceivers.

Whenever the sensor is triggered, it communicates to the GCs in the system via a 345Mhz transmitter. The Base & Console will ACK the sensor using 2.4Ghz.

The Base should be connected to the telephone network via its RJ11 connector. The phone interface is normally used for voice phone calls, which are made from devices other than the Base in the system. For example, the telephone interface of the Base can be exercised by using the speakerphone of the Console. The Base might also use the telephone interface for transmitting data to a monitoring center.

The Base should be connected to a network via the RJ45 connector. This connection allows remote access to the system, and is the primary method for transmitting data to a monitoring center.

I. Method of Monitoring EUT Operation

Status of the system is always displayed via the LCD on the Console. Whenever any device in the system is not operating normally, every GC in the system will attempt to inform the user. All GC devices will provide an audible "trouble" beep, and those with an LCD (Console) will display the status so the operator knows what the problem is.

The devices in a system constantly monitor the 2.4Ghz radio. If any of them lose communication with the FP, the trouble condition will be reported to the user via all GCs that are still communicating properly.

The Base also monitors the status of the phone line and ethernet connections, and will cause a trouble condition to be reported if they are not operating properly.

The Base itself does not provide any visual feedback to the user that it is operating properly. To verify that the Base is turned on and code is running, briefly press the button on the rear of the unit which should provide an audible beep. In addition, if the Base stops communicating, the Console will report a trouble condition.

J. Modifications

a) Modifications to EUT

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the test standard.

K. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to LifeShield, Inc. upon completion of testing.

III. Electromagnetic Compatibility Criteria for Unintentional Radiators

Electromagnetic Compatibility Criteria

§ 15.107 Conducted Emissions Limits

Test Requirement(s):

15.107 (a) Except for Class A digital devices, for equipment that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals.

15.107 (b) For a Class A digital device that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals. The lower limit applies at the band edges.

15.207(a), Except as shown in paragraphs (b) and (c) of this section*, charging, AC adapters or battery eliminators the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30 MHz, shall not exceed the limits in the Table 7, as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

| Frequency range (MHz) | Class A Conducted Limits (dB μ V) | | *Class B Conducted Limits (dB μ V) | |
|--------------------------|--|---------|---|---------|
| | Quasi-Peak | Average | Quasi-Peak | Average |
| * 0.15- 0.45 | 79 | 66 | 66 - 56 | 56 - 46 |
| 0.45 - 0.5 | 79 | 66 | 56 | 46 |
| 0.5 - 30 | 73 | 60 | 60 | 50 |

Note 1 — The lower limit shall apply at the transition frequencies.
 Note 2 — The limit decreases linearly with the logarithm if the frequency in the range 0.15 MHz to 0.5 MHz.
 * -- Limits per Subsection 15.207(a).

Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)

Test Results:

The EUT was compliant with the Class B requirement(s) of this section. Measured emissions were below applicable limits.

Test Engineer(s):

Jeffrey Pratt

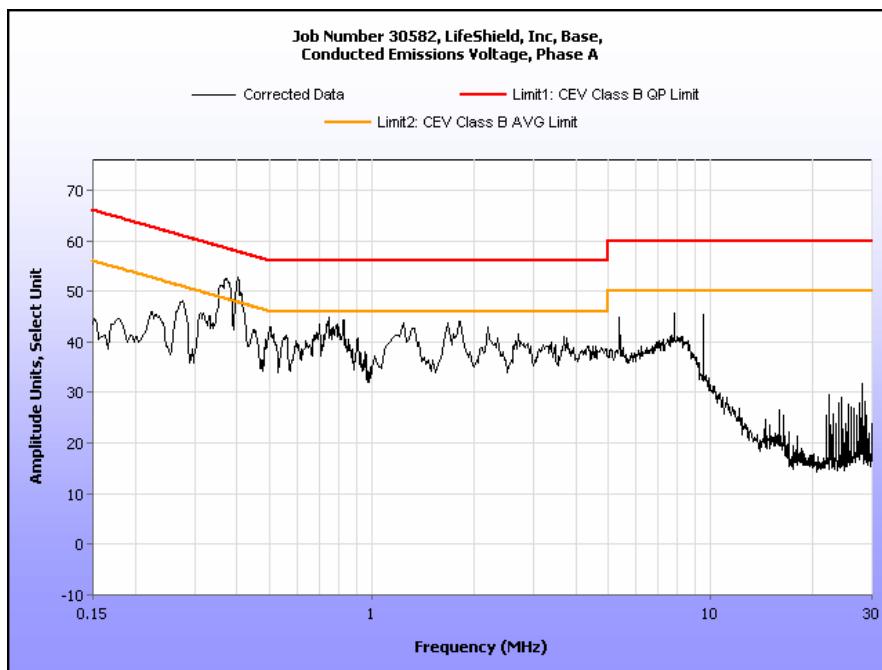
Test Date(s):

02/10/11

Conducted Emissions - Voltage, AC Power, Phase Line (120 VAC, 60 Hz)

| Frequency (MHz) | Uncorrected Meter Reading (dBuV) QP | Cable Loss (dB) | Corrected Measurement (dBuV) QP | Limit (dBuV) QP | Margin (dB) QP | Uncorrected Meter Reading (dBuV) Avg. | Cable Loss (dB) | Corrected Measurement (dBuV) AVG | Limit (dBuV) AVG | Margin (dB) AVG |
|-----------------|-------------------------------------|-----------------|---------------------------------|-----------------|----------------|---------------------------------------|-----------------|----------------------------------|------------------|-----------------|
| 0.28 | 41.95 | 0 | 41.95 | 60.82 | -18.87 | 33.79 | 0 | 33.79 | 50.82 | -17.03 |
| 0.37 | 47.19 | 0 | 47.19 | 58.5 | -11.31 | 37.81 | 0 | 37.81 | 48.5 | -10.69 |
| 0.4 | 39.24 | 0 | 39.24 | 57.85 | -18.61 | 28.08 | 0 | 28.08 | 47.85 | -19.77 |
| 3.96 | 26.88 | 0.01 | 26.89 | 56 | -29.11 | 16.82 | 0.01 | 16.83 | 46 | -29.17 |
| 4.8 | 29.64 | 0.05 | 29.69 | 56 | -26.31 | 20.34 | 0.05 | 20.39 | 46 | -25.61 |
| 9.55 | 26.82 | 0.03 | 26.85 | 60 | -33.15 | 16.7 | 0.03 | 16.73 | 50 | -33.27 |

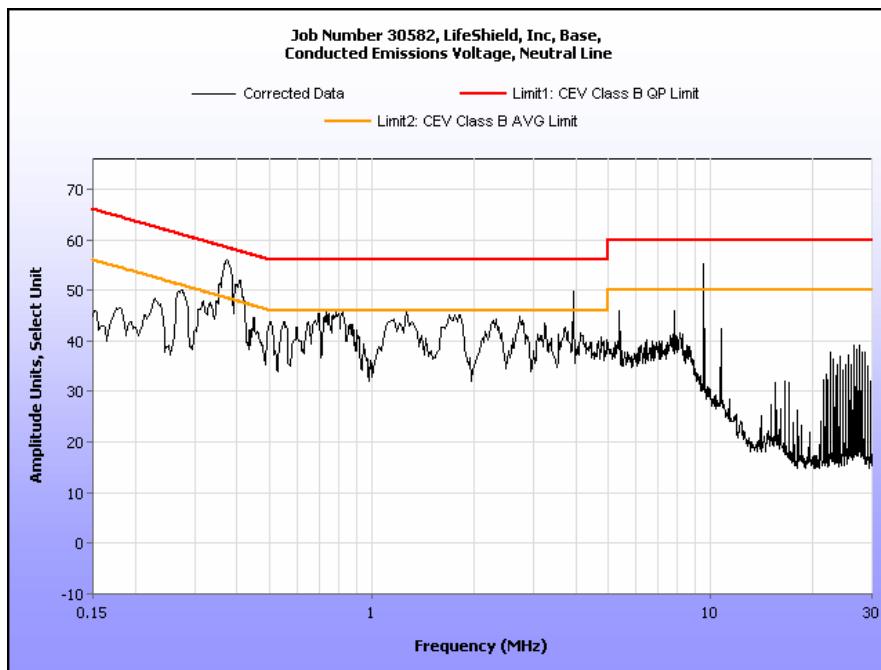
Table 8. Conducted Emissions - Voltage, AC Power, Phase Line (120 VAC, 60 Hz)



Conducted Emissions - Voltage, AC Power, Neutral Line (120 VAC, 60 Hz)

| Frequency (MHz) | Uncorrected Meter Reading (dBuV) QP | Cable Loss (dB) | Corrected Measurement (dBuV) QP | Limit (dBuV) QP | Margin (dB) QP | Uncorrected Meter Reading (dBuV) Avg. | Cable Loss (dB) | Corrected Measurement (dBuV) AVG | Limit (dBuV) AVG | Margin (dB) AVG |
|-----------------|-------------------------------------|-----------------|---------------------------------|-----------------|----------------|---------------------------------------|-----------------|----------------------------------|------------------|-----------------|
| 0.39 | 35.95 | 0 | 35.95 | 58.06 | -22.11 | 25.49 | 0 | 25.49 | 48.06 | -22.57 |
| 0.41 | 42.57 | 0 | 42.57 | 57.65 | -15.08 | 30.35 | 0 | 30.35 | 47.65 | -17.3 |
| 1.2 | 34.51 | 0 | 34.51 | 56 | -21.49 | 22.7 | 0 | 22.7 | 46 | -23.3 |
| 1.65 | 33.57 | 0 | 33.57 | 56 | -22.43 | 23.66 | 0 | 23.66 | 46 | -22.34 |
| 7.82 | 31.03 | 0 | 31.03 | 60 | -28.97 | 21.67 | 0 | 21.67 | 50 | -28.33 |
| 9.54 | 21.94 | 0.03 | 21.97 | 60 | -38.03 | 14.31 | 0.03 | 14.34 | 50 | -35.66 |

Table 9. Conducted Emissions - Voltage, AC Power, Neutral Line (120 VAC, 60 Hz)



Plot 2. Conducted Emission, Neutral Line Plot

Conducted Emission Limits Test Setup



Photograph 2. Conducted Emissions, Test Setup without Radio

Radiated Emission Limits

§ 15.109 Radiated Emissions Limits

Test Requirement(s):

15.109 (a) Except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the Class B limits expressed in Table 10.

15.109 (b) The field strength of radiated emissions from a Class A digital device, as determined at a distance of 10 meters, shall not exceed the Class A limits expressed in Table 10.

| Frequency (MHz) | Field Strength (dB μ V/m) | |
|-----------------|---|--|
| | §15.109 (b), Class A Limit (dB μ V) @ 10m | §15.109 (a), Class B Limit (dB μ V) @ 3m |
| 30 - 88 | 39.00 | 40.00 |
| 88 - 216 | 43.50 | 43.50 |
| 216 - 960 | 46.40 | 46.00 |
| Above 960 | 49.50 | 54.00 |

Table 10. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b)

Test Procedures:

The EUT was placed on a non-metallic table, 80 cm above the ground plane inside a semi-anechoic chamber. The method of testing and test conditions of ANSI C63.4 were used. An antenna was located 3 m from the EUT on an adjustable mast. A pre-scan was first performed in order to find prominent radiated emissions. For final emissions measurements at each frequency of interest, the EUT was rotated and the antenna height was varied between 1 m and 4 m in order to maximize the emission. Measurements in both horizontal and vertical polarities were made and the data was recorded. Unless otherwise specified, measurements were made using a quasi-peak detector with a 120 kHz bandwidth.

Test Results:

The EUT was compliant with the Class B requirement(s) of this section. Measured emissions were below applicable limits.

Test Engineer(s):

Dusmantha Tennakoon

Test Date(s):

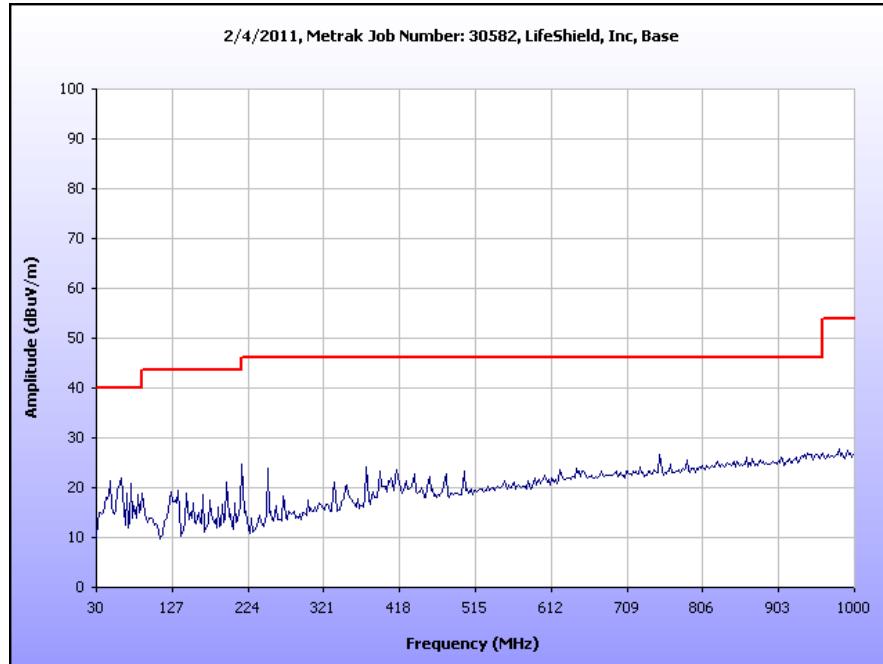
02/04/11

Radiated Emissions Limits Test Results, Class B

| Frequency (MHz) | EUT Azimuth (Degrees) | Antenna Polarity (H/V) | Antenna HEIGHT (m) | Uncorrected Amplitude (dBuV) | Antenna Correction Factor (dB) (+) | Cable Loss (dB) (+) | Distance Correction Factor (dB) (-) | Corrected Amplitude (dBuV/m) | Limit (dBuV/m) | Margin (dB) |
|-----------------|-----------------------|------------------------|--------------------|------------------------------|------------------------------------|---------------------|-------------------------------------|------------------------------|----------------|-------------|
| 61.811623 | 52 | H | 2.26 | 5.87 | 7.58 | 0.23 | 0.00 | 13.68 | 40.00 | -26.32 |
| 61.811623 | 348 | V | 1.00 | 7.04 | 7.58 | 0.23 | 0.00 | 14.85 | 40.00 | -25.15 |
| 47.322645 | 124 | H | 1.40 | 5.80 | 9.54 | 0.23 | 0.00 | 15.57 | 40.00 | -24.43 |
| 47.322645 | 12 | V | 1.00 | 7.66 | 9.54 | 0.23 | 0.00 | 17.43 | 40.00 | -22.57 |
| 217.71969 | 78 | H | 1.00 | 9.73 | 11.31 | 0.23 | 0.00 | 21.27 | 46.00 | -24.73 |
| 217.71969 | 56 | V | 1.00 | 14.34 | 11.31 | 0.23 | 0.00 | 25.88 | 46.00 | -20.12 |
| 250.0496 | 269 | H | 1.31 | 12.29 | 12.10 | 0.50 | 0.00 | 24.89 | 46.00 | -21.11 |
| 250.0496 | 47 | V | 1.00 | 11.20 | 12.10 | 0.50 | 0.00 | 23.80 | 46.00 | -22.20 |

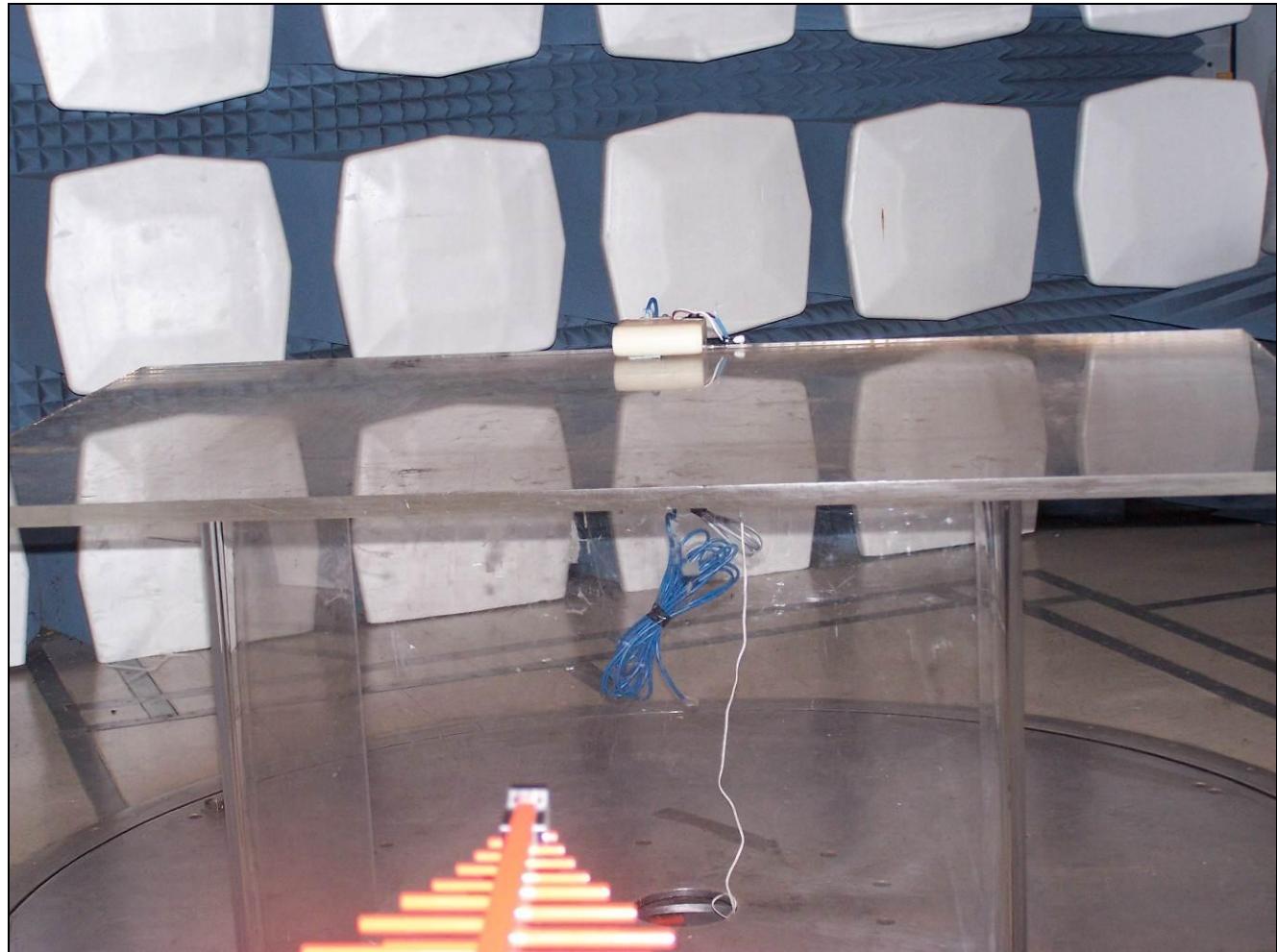
Table 11. Radiated Emissions Limits, Test Results, 30 MHz – 1 GHz

Note: The EUT was tested at 3 m.



Plot 3. Radiated Emissions, Pre-Scan, 30 MHz - 1 GHz

Radiated Emission Limits Test Setup



Photograph 3. Radiated Emission, Test Setup

IV. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.203 Antenna Requirement

Test Requirement:

§ 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

Results:

The EUT as tested is compliant the criteria of §15.203. The EUT has an integral printed F antenna.

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 02/04/11

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207(a) Conducted Emissions Limits

Test Requirement(s): **§ 15.207 (a):** For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

| Frequency range (MHz) | § 15.207(a), Conducted Limit (dB μ V) | |
|--------------------------|---|---------|
| | Quasi-Peak | Average |
| * 0.15 - 0.45 | 66 - 56 | 56 - 46 |
| 0.45 - 0.5 | 56 | 46 |
| 0.5 - 30 | 60 | 50 |

Table 12. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Procedure:

The EUT was placed on a 0.8 m-high wooden table inside a screen room. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50 Ω /50 μ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with *ANSI C63.4-2003 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz"*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50 Ω /50 μ H LISN as the input transducer to an EMC/field intensity meter. For the purpose of this testing, the transmitter was turned on. Scans were performed with the transmitter on.

Test Results:

The EUT was compliant with this requirement. Measured emissions were below applicable limits. Testing was performed when the EUT was frequency hopping.

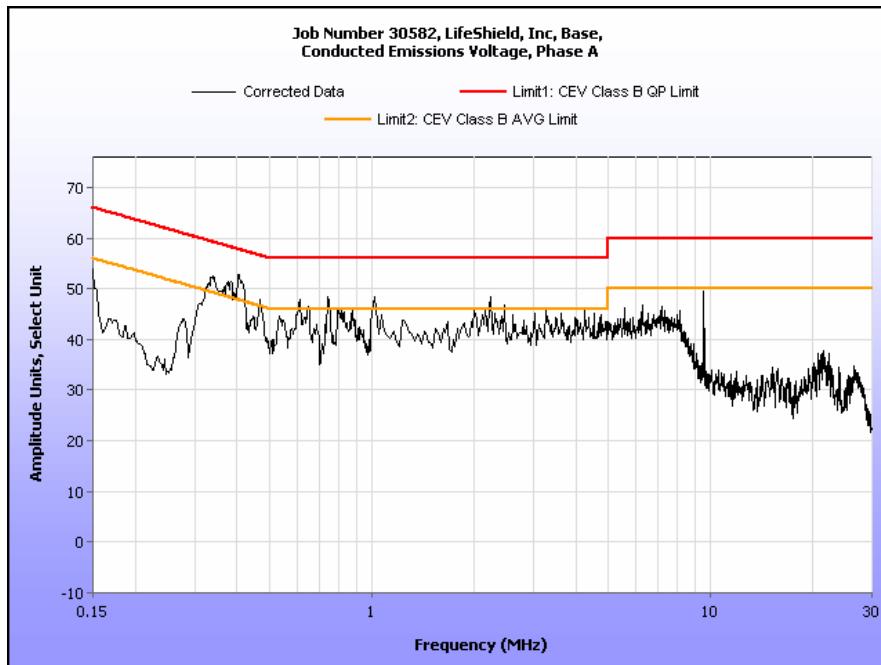
Test Engineer(s): Jeffrey Pratt

Test Date(s): 02/10/11

15.207(a) Conducted Emissions Test Results

| Frequency (MHz) | Uncorrected Meter Reading (dBuV) QP | Cable Loss (dB) | Corrected Measurement (dBuV) QP | Limit (dBuV) QP | Margin (dB) QP | Uncorrected Meter Reading (dBuV) Avg. | Cable Loss (dB) | Corrected Measurement (dBuV) AVG | Limit (dBuV) AVG | Margin (dB) AVG |
|-----------------|-------------------------------------|-----------------|---------------------------------|-----------------|----------------|---------------------------------------|-----------------|----------------------------------|------------------|-----------------|
| 0.34 | 44.56 | 0 | 44.56 | 59.2 | -14.64 | 33.58 | 0 | 33.58 | 49.2 | -15.62 |
| 0.41 | 43.27 | 0 | 43.27 | 57.65 | -14.38 | 33.17 | 0 | 33.17 | 47.65 | -14.48 |
| 0.82 | 36.2 | 0 | 36.2 | 56 | -19.8 | 24.59 | 0 | 24.59 | 46 | -21.41 |
| 1.3 | 32.43 | 0 | 32.43 | 56 | -23.57 | 22.44 | 0 | 22.44 | 46 | -23.56 |
| 2.22 | 33.52 | 0 | 33.52 | 56 | -22.48 | 21.49 | 0 | 21.49 | 46 | -24.51 |
| 9.56 | 22.68 | 0.03 | 22.71 | 60 | -37.29 | 14.06 | 0.03 | 14.09 | 50 | -35.91 |

Table 13. Conducted Emissions, 15.207(a), Phase Line, Test Results

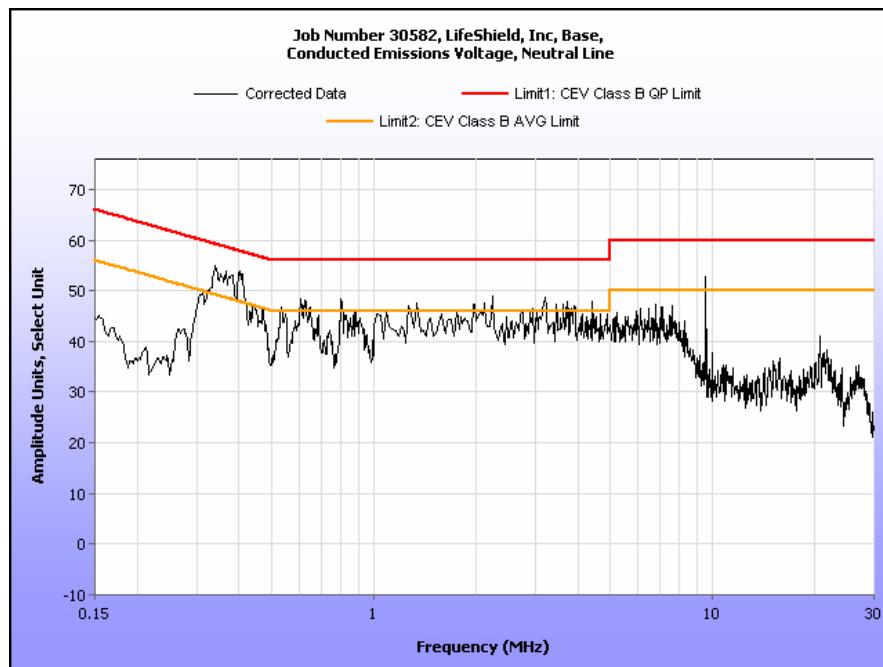


Plot 4. Conducted Emissions, 15.207(a), Phase Line

15.207(a) Conducted Emissions Test Results

| Frequency (MHz) | Uncorrected Meter Reading (dBuV) QP | Cable Loss (dB) | Corrected Measurement (dBuV) QP | Limit (dBuV) QP | Margin (dB) QP | Uncorrected Meter Reading (dBuV) Avg. | Cable Loss (dB) | Corrected Measurement (dBuV) AVG | Limit (dBuV) AVG | Margin (dB) AVG |
|-----------------|-------------------------------------|-----------------|---------------------------------|-----------------|----------------|---------------------------------------|-----------------|----------------------------------|------------------|-----------------|
| 0.37 | 43.87 | 0 | 43.87 | 58.5 | -14.63 | 32.99 | 0 | 32.99 | 48.5 | -15.51 |
| 0.41 | 43.19 | 0 | 43.19 | 57.65 | -14.46 | 32.43 | 0 | 32.43 | 47.65 | -15.22 |
| 0.8 | 30.95 | 0 | 30.95 | 56 | -25.05 | 19.36 | 0 | 19.36 | 46 | -26.64 |
| 1.99 | 33.15 | 0 | 33.15 | 56 | -22.85 | 24.19 | 0 | 24.19 | 46 | -21.81 |
| 2.47 | 30.55 | 0 | 30.55 | 56 | -25.45 | 20.02 | 0 | 20.02 | 46 | -25.98 |
| 9.55 | 38.61 | 0.03 | 38.64 | 60 | -21.36 | 15.29 | 0.03 | 15.32 | 50 | -34.68 |

Table 14. Conducted Emissions, 15.207(a), Neutral Line, Test Results



Plot 5. Conducted Emissions, 15.207(a), Neutral Line

15.207(a) Conducted Emissions Test Setup Photo



Photograph 4. Conducted Emissions, 15.207(a), Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) 20 dB Occupied Bandwidth

Test Requirements: **§ 15.247(a):** Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. For DTS, the minimum 6 dB bandwidth shall be at least 500 kHz. For frequency hopping systems, the EUT shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

Test Procedure: The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately equal to 1% of the total emission bandwidth. The 20 dB bandwidth was measured and recorded. Measurements were made radiated.

Test Results The EUT was compliant with § 15.247 (a)(1). As can be seen in the following plots the carrier frequencies are separated by the 20 dB bandwidth of the hopping channels

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 02/10/11

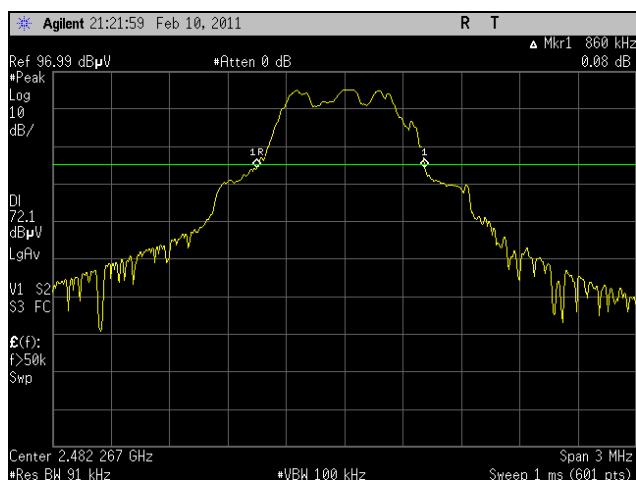
Occupied Bandwidth Test Results



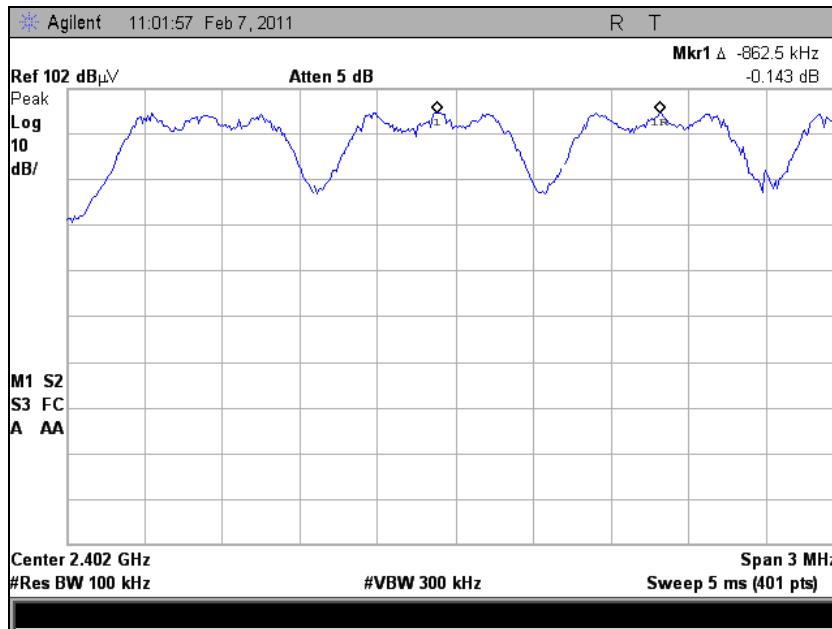
Plot 6. 20 dB Occupied Bandwidth, Low Channel



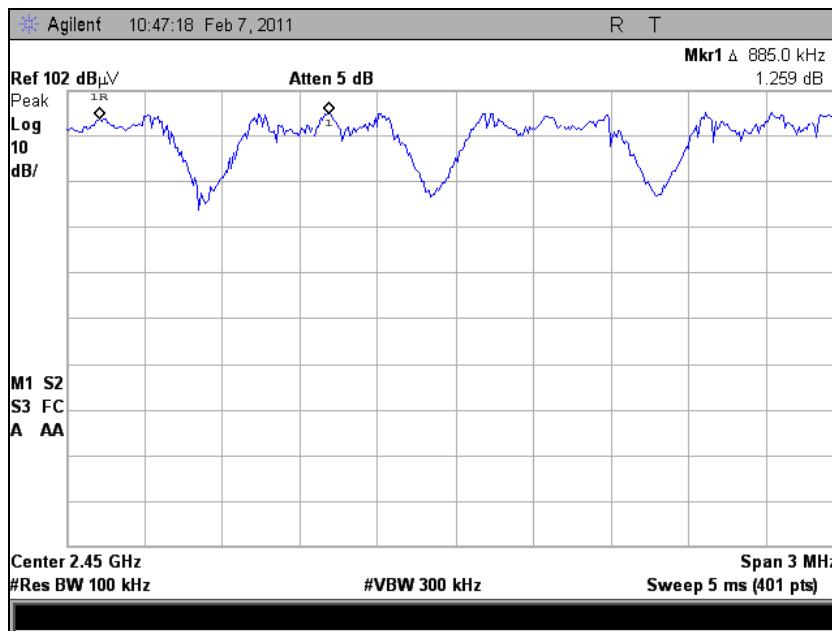
Plot 7. 20 dB Occupied Bandwidth, Mid Channel



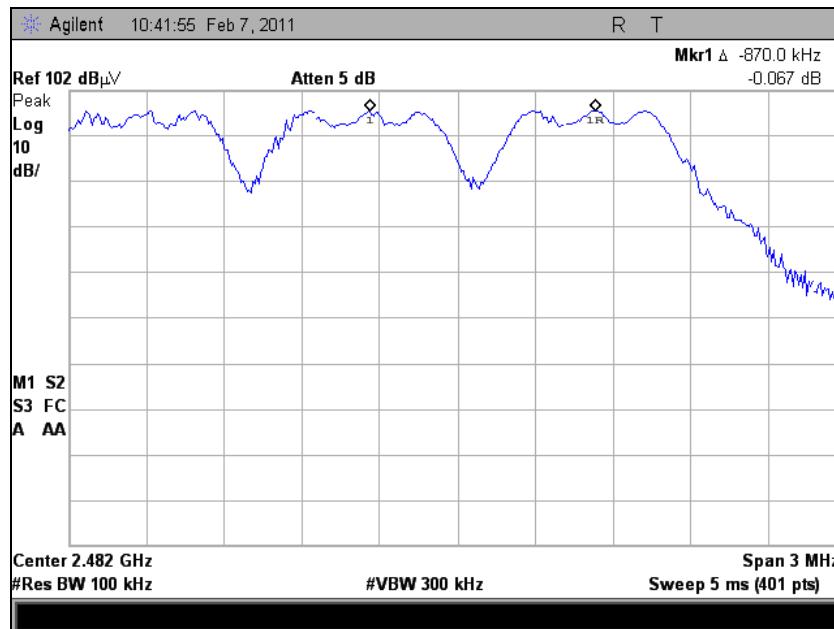
Plot 8. 20 dB Occupied Bandwidth, High Channel



Plot 9. Channel Separation, Low Channel



Plot 10. Channel Separation, Mid Channel



Plot 11. Channel Separation, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1)(iii) Average Time of Occupancy (Dwell Time) and Number of channels

Test Requirements: **§ 15.247(a)(1)(iii):** Frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed.

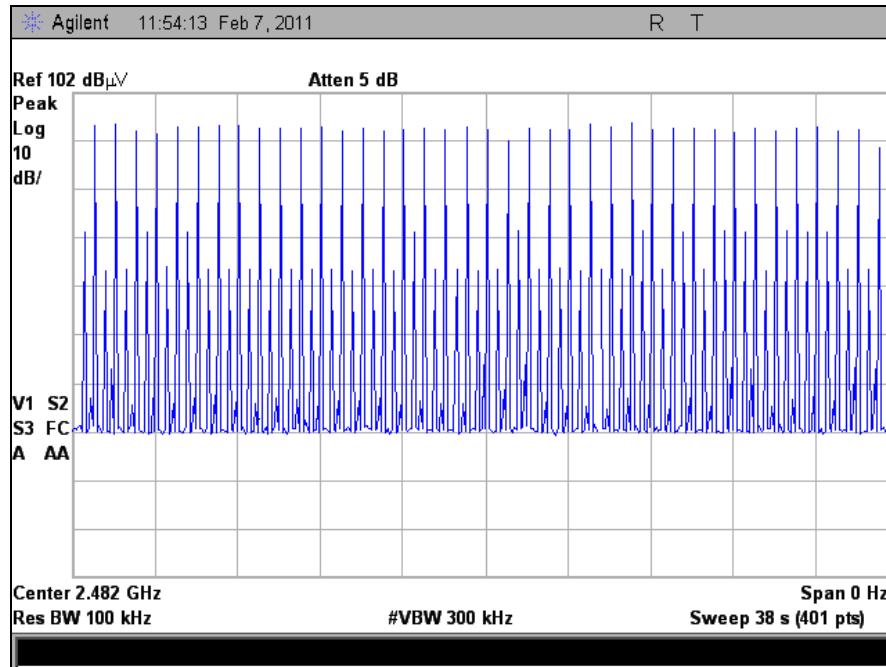
Test Procedure: The EUT was placed in hopping mode. The SA was set on zero span on a particular channel. The sweep time was set to 38 ms ($95 * 0.4 = 38$ sec). The number of times the channel appeared on this channel was recorded. Then the EUT was set to transmit on a single channel and the duty cycle was measured and recorded.

Test Results The EUT was compliant with § 15.247 (a)(1)(iii).

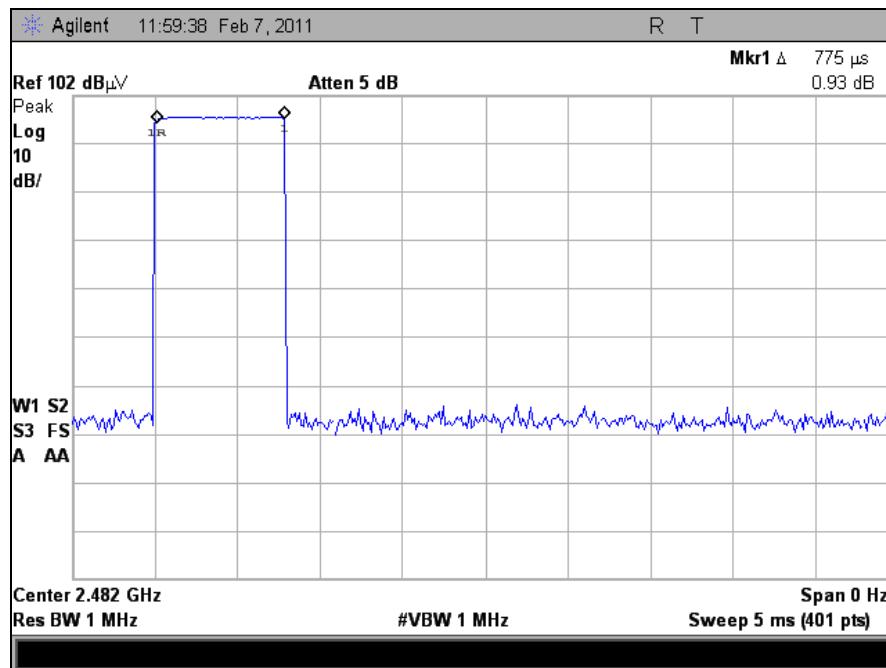
The Tx on time = 0.775 ms
Number of times channel appears in a 38 s window = 39
Time of average occupancy = $39 * 0.775 = 30.225$ ms < 0.4 Seconds

Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 02/10/11



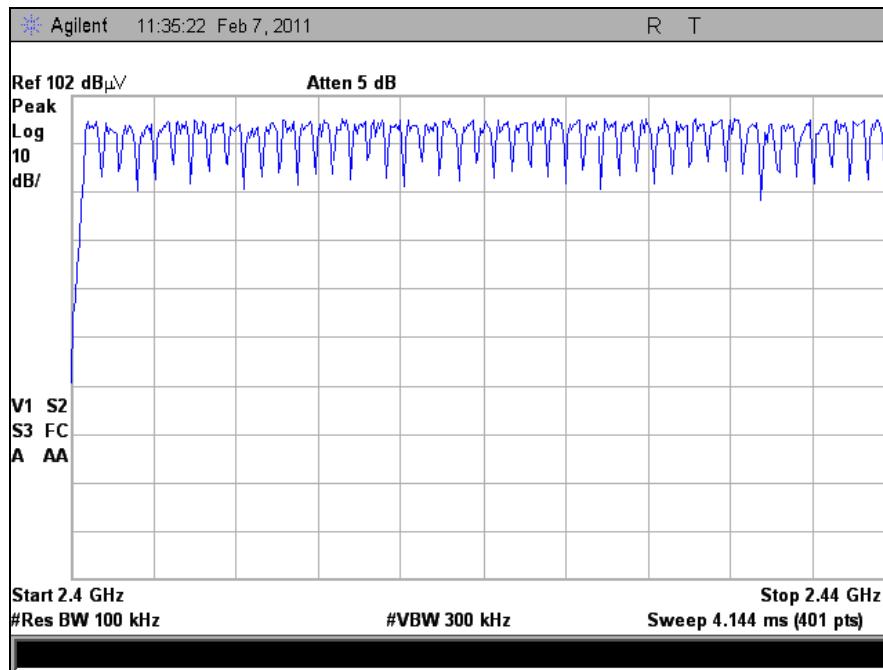
Plot 12. No. of Times Channel Repeats



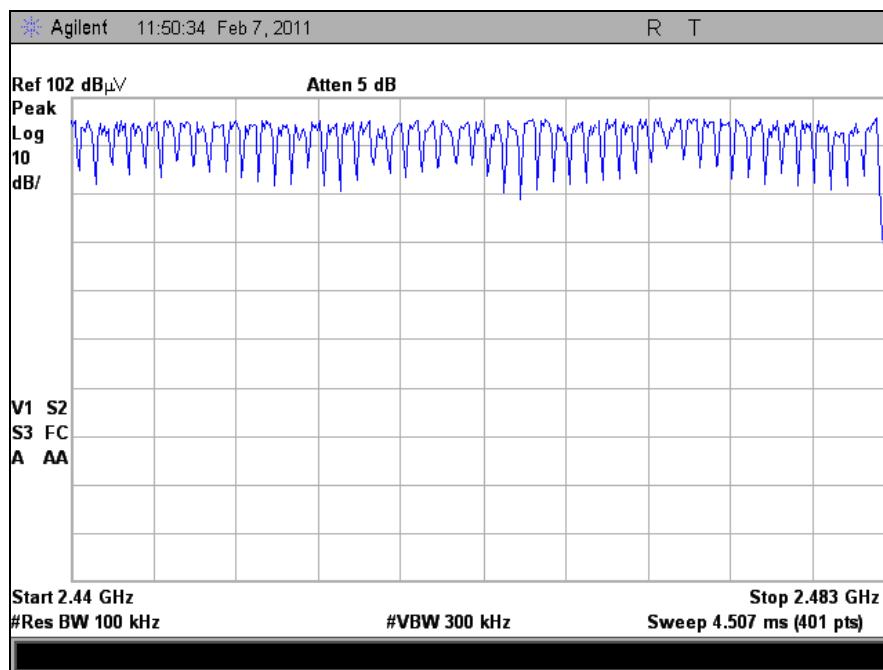
Plot 13. Dwell Time

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) Number of RF Channels



Plot 14. Number of RF Channels, Part 1



Plot 15. Number of RF Channels, Part 2

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Output Power

Test Requirements: **§15.247(b)(1):** The maximum peak output power of the intentional radiator shall not exceed 0.125 Watts for frequency hopping systems operating in the 2400-2483.5 MHz band. .

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

Fixed, point-to-point operation excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

Test Procedure: The EUT was measured at the low, mid and high channels of each band at the maximum power level. Measurements were done radiated and the fundamental field strength was measured at 1m.

Test Results: The EUT was compliant with the limits of **§15.247(b)**.

Test Engineer(s): Dusmantha Tennakoon

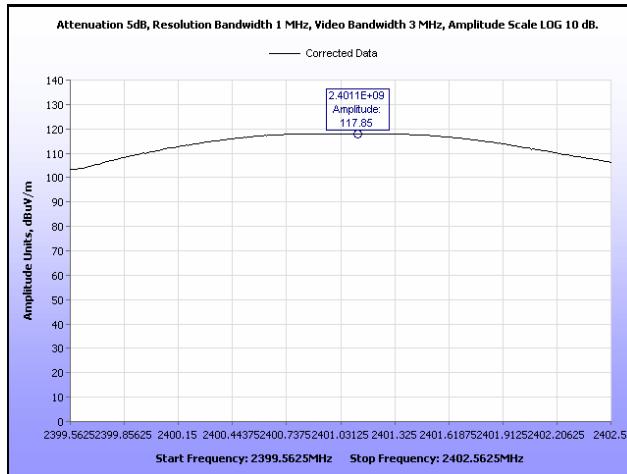
Test Date(s): 02/10/11

Fundamental Field Strength Test Results

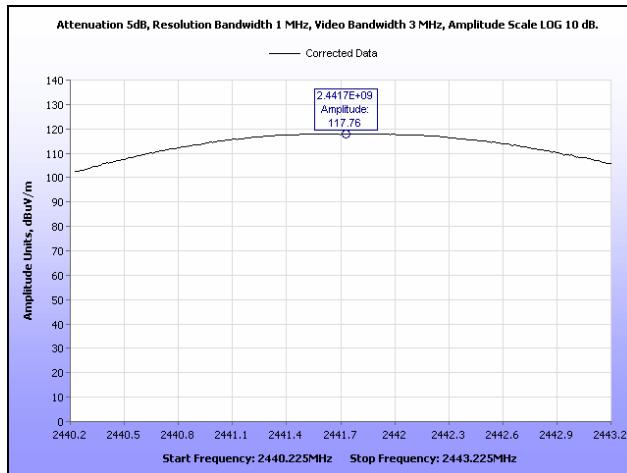
| Channel | Frequency (GHz) | Measured corrected reading @ 1m (Eo dBuV) | EIRP=E _o +20log(d)-104.8 (dBm) | Limit (dBm) |
|---------|-----------------|---|---|-------------|
| low | 2.401 | 117.85 | 13.05 | 36 |
| mid | 2.442 | 117.76 | 12.96 | 36 |
| high | 2.482 | 117.44 | 12.64 | 36 |

Table 15. EIRP, Test Results

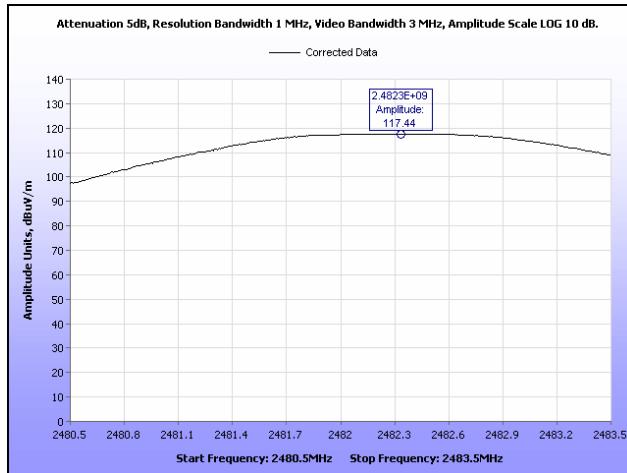
Fundamental Field Strength Test Results



Plot 16. Fundamental Field Strength, Low Channel



Plot 17. Fundamental Field Strength, Mid Channel



Plot 18. Fundamental Field Strength, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

Test Requirements: **§15.247(d); §15.205:** Emissions outside the frequency band.

§15.247(d): In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. Attenuation below the general limits specified in § 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in § 15.205(a), must also comply with the radiated emission limits specified in § 15.209(a).

§15.205(a): Except as shown 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 | 399.9–410 | 4.5–5.15 |
| ¹ 0.495–0.505----- | 16.69475–16.69525 | 608–614 | 5.35–5.46 |
| 2.1735–2.1905----- | 16.80425–16.80475 | 960–1240 | 7.25–7.75 |
| 4.125–4.128----- | 25.5–25.67 | 1300–1427 | 8.025–8.5 |
| 4.17725–4.17775----- | 37.5–38.25 | 1435–1626.5 | 9.0–9.2 |
| 4.20725–4.20775----- | 73–74.6 | 1645.5–1646.5 | 9.3–9.5 |
| 6.215–6.218----- | 74.8–75.2 | 1660–1710 | 10.6–12.7 |
| 6.26775–6.26825----- | 108–121.94 | 1718.8–1722.2 | 13.25–13.4 |
| 6.31175–6.31225----- | 123–138 | 2200–2300 | 14.47–14.5 |
| 8.291–8.294----- | 149.9–150.05 | 2310–2390 | 15.35–16.2 |
| 8.362–8.366----- | 156.52475–156.52525 | 2483.5–2500 | 17.7–21.4 |
| 8.37625–8.38675----- | 156.7–156.9 | 2655–2900 | 22.01–23.12 |
| 8.41425–8.41475----- | 162.0125–167.17 | 3260–3267 | 23.6–24.0 |
| 12.29–12.293----- | 167.72–173.2 | 3332–3339 | 31.2–31.8 |
| 12.51975–12.52025----- | 240–285 | 3345.8–3358.36. | 43–36.5 |
| 12.57675–12.57725----- | 322–335.4 | 3600–4400 | (²) |

Table 16. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

Test Requirement(s): **§ 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 Table 17.

| Frequency (MHz) | § 15.209(a), Radiated Emission Limits (dB μ V) @ 3m |
|-----------------|---|
| 30 - 88 | 40.00 |
| 88 - 216 | 43.50 |
| 216 - 960 | 46.00 |
| Above 960 | 54.00 |

Table 17. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)

Test Procedure:

The transmitter was set to the mid channel at the highest output power and placed on a 0.8 m high wooden table inside in a semi-anechoic chamber. Measurements were performed with the EUT rotated 360 degrees and varying the adjustable antenna mast with 1 m to 4 m height to determine worst case orientation for maximum emissions. Measurement were repeated the measurement at the low and highest channels.

For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Test Results:

The EUT was compliant with the Radiated Spurious Emission limits of **§ 15.247**. The following table lists the emissions that were seen between 1-18 GHz. Below 1 GHz the emissions are shown as corrected plots. Above 18 GHz, the emissions are shown as corrected plots as well.

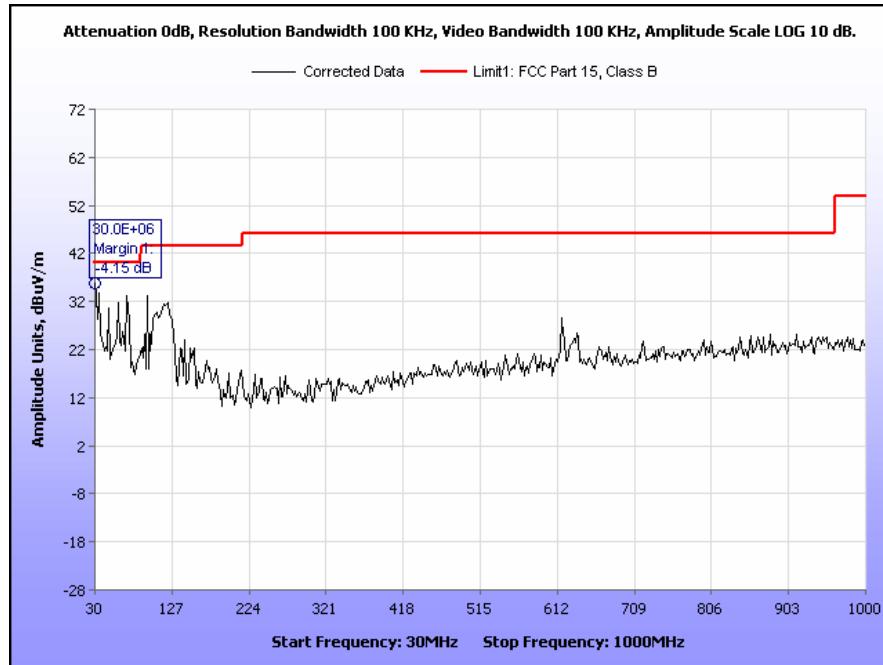
Test Engineer(s): Dusmantha Tennakoon

Test Date(s): 02/10/11

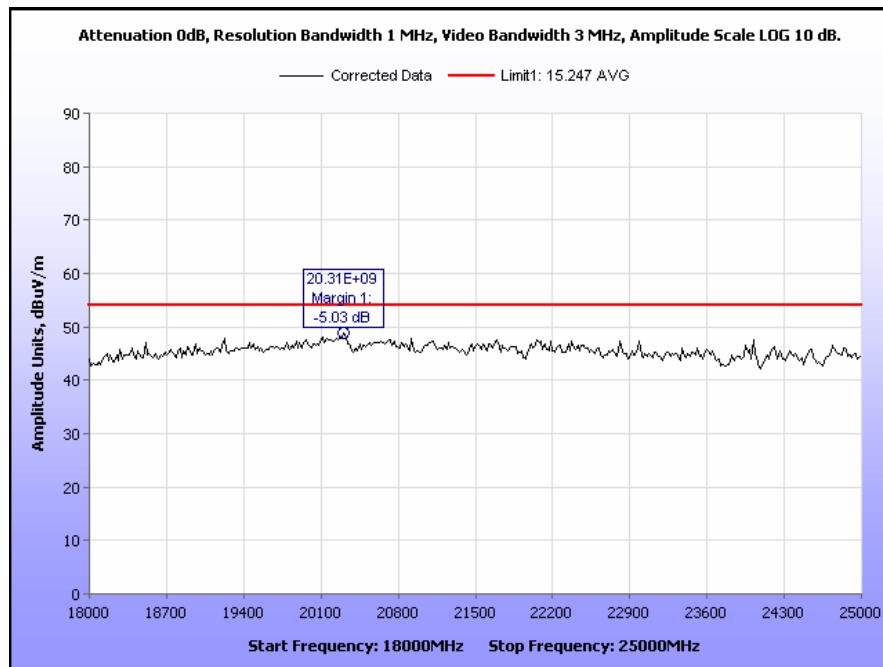
| Channel (MHz) | Measured Frequency (MHz) | Measured corrected amplitude (dBuV/m) | Limit (dBuV/m) | Margin (dB) | Detector | Remark |
|---------------|--------------------------|---------------------------------------|----------------|-------------|----------|-----------------------------|
| low | 1.2025 | 41.29 | 54 | -12.71 | Peak | Peak value below avg. limit |
| | 3.61 | 53.94 | 54 | -0.06 | Peak | Peak value below avg. limit |
| | 4.802 | 46.8 | 54 | -7.2 | Peak | Peak value below avg. limit |
| | 7.21 | 36.26 | 54 | -17.74 | Avg. | |
| | 7.21 | 54.88 | 74 | -19.12 | Peak | |
| mid | 1.225 | 43.52 | 54 | -10.48 | Peak | Peak value below avg. limit |
| | 3.655 | 48.37 | 54 | -5.63 | Peak | Peak value below avg. limit |
| | 4.892 | 44.43 | 54 | -9.57 | Peak | Peak value below avg. limit |
| | 7.322 | 37.26 | 54 | -16.74 | Avg. | |
| | 7.322 | 57.5 | 74 | -16.5 | Peak | |
| high | 1.247 | 47.94 | 54 | -6.06 | Peak | Peak value below avg. limit |
| | 3.722 | 44.8 | 54 | -9.2 | Peak | Peak value below avg. limit |
| | 7.457 | 35.52 | 54 | -18.48 | Avg. | |
| | 7.457 | 59.62 | 74 | -14.38 | Peak | |

Table 18. Radiated Spurious Emissions, Test Results

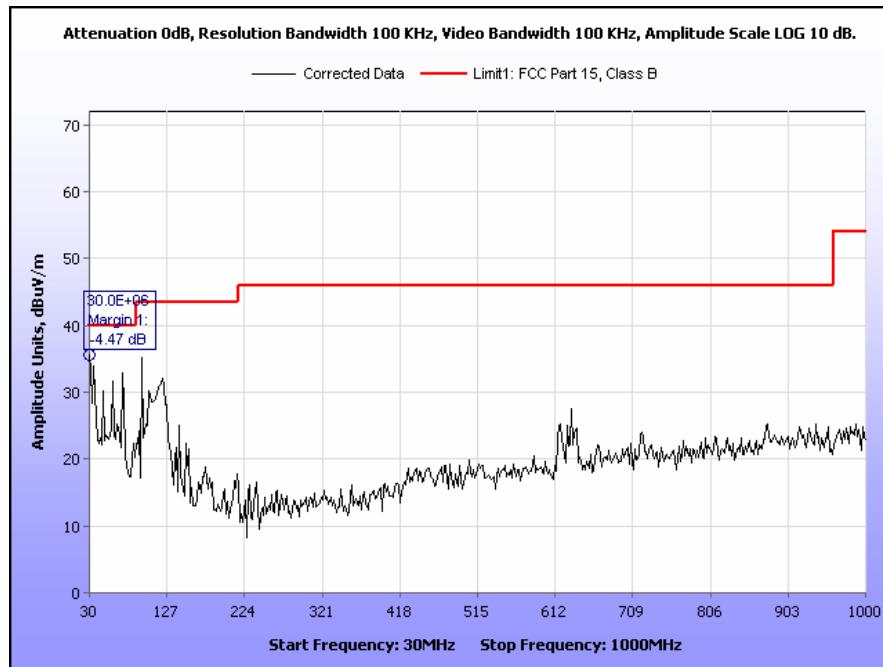
Radiated Spurious Emissions Test Results



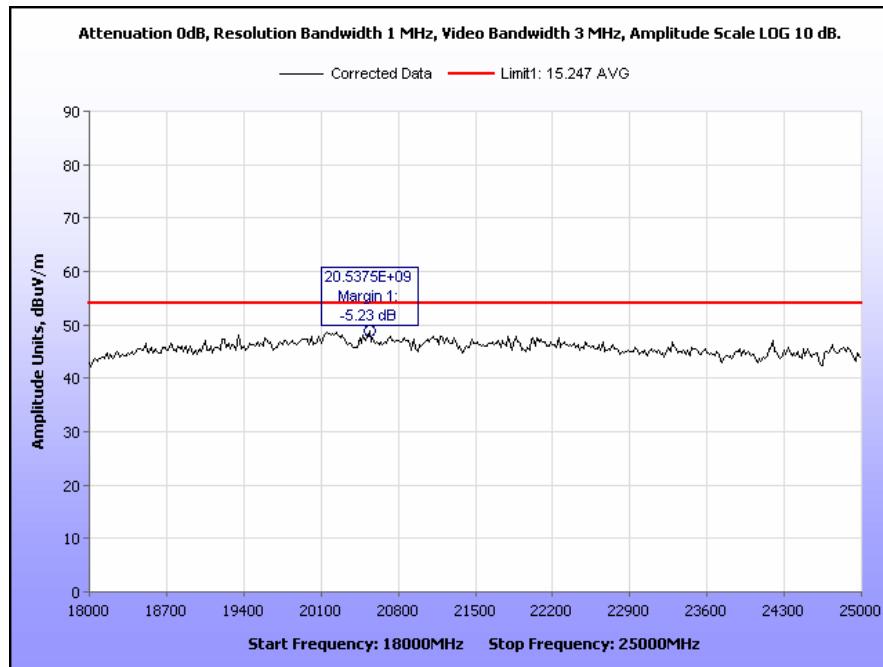
Plot 19. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz



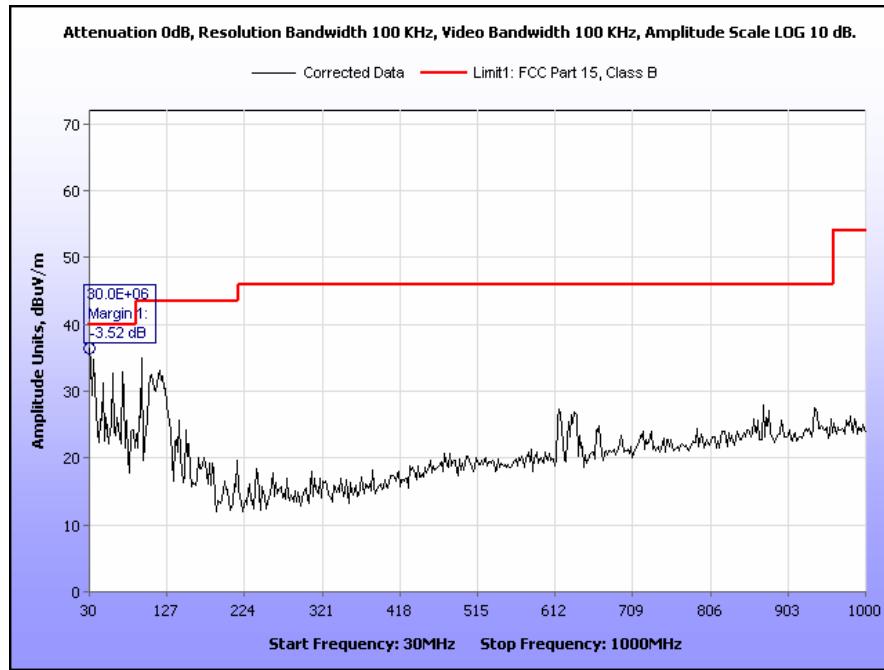
Plot 20. Radiated Spurious Emissions, Low Channel, 18 GHz – 25 GHz



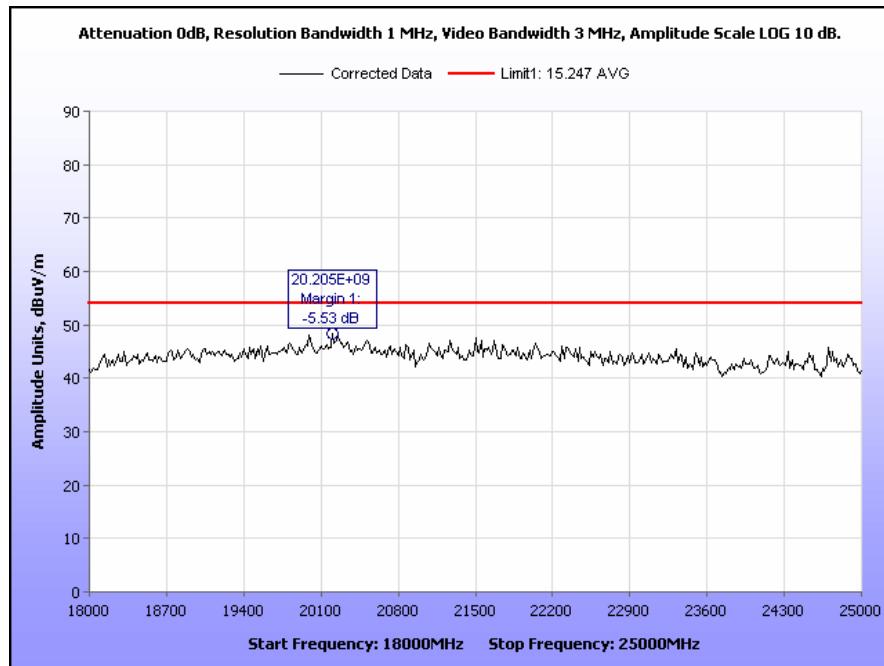
Plot 21. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz



Plot 22. Radiated Spurious Emissions, Mid Channel, 18 GHz – 25 GHz



Plot 23. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz

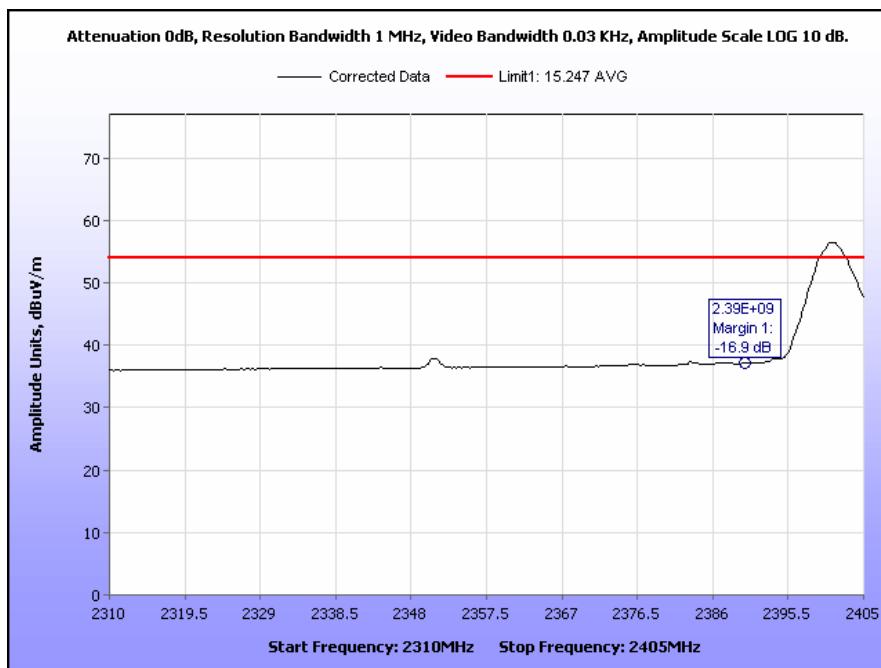


Plot 24. Radiated Spurious Emissions, High Channel, 18 GHz – 25 GHz

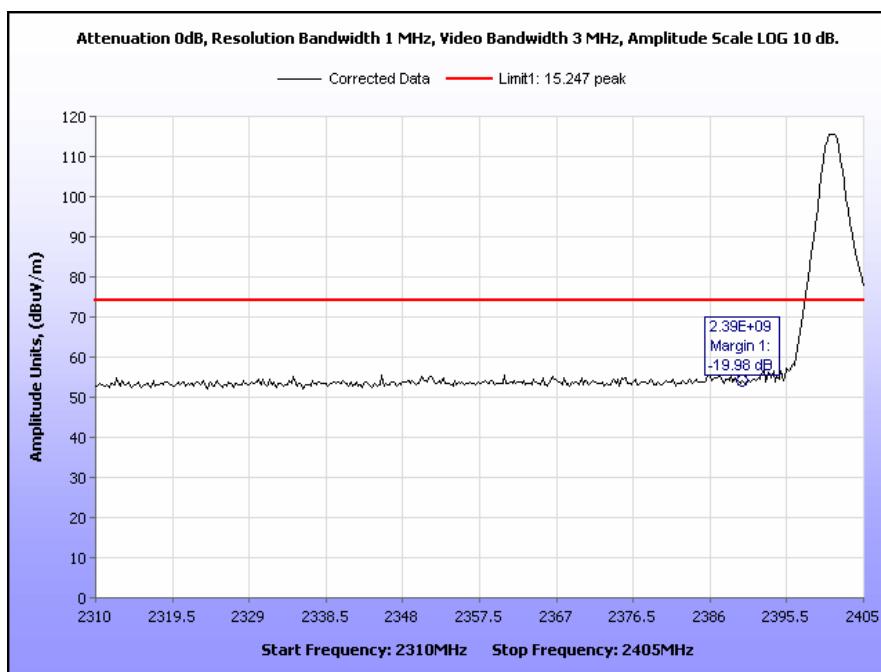
Radiated Band Edge Measurements

Test Procedures:

The transmitter was turned on. Measurements were performed of the low and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor, distance and cable loss .



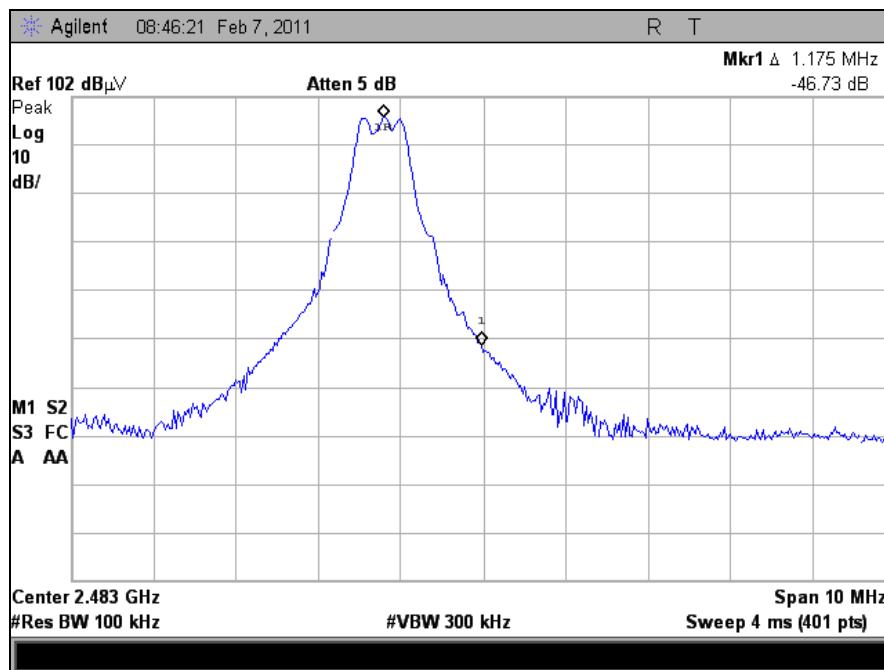
Plot 25. Radiated Restricted Band Edge, Average, 2310 – 2390 MHz



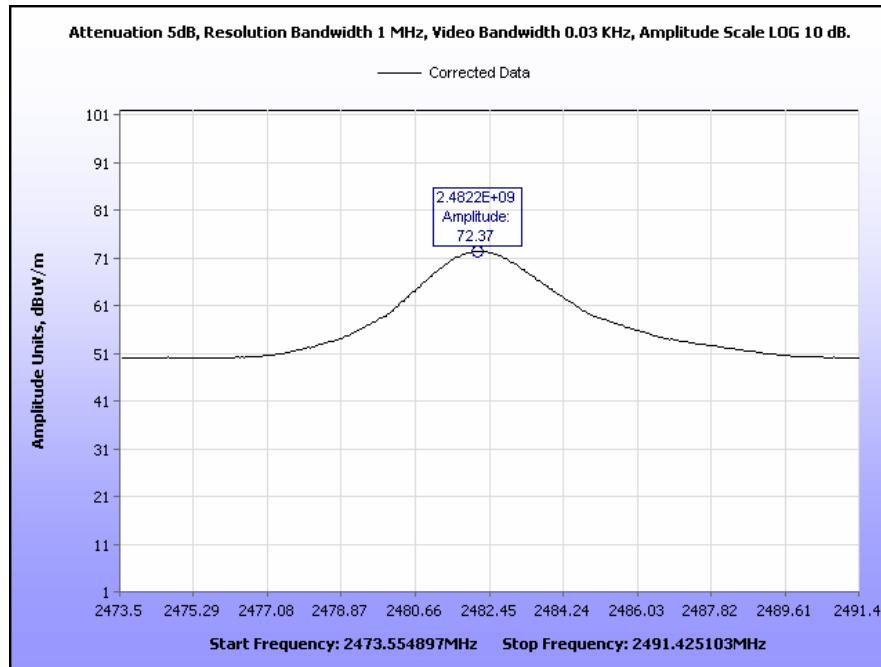
Plot 26. Radiated Restricted Band Edge, Peak, 2310 – 2390 MHz

Test Procedures for Radiated Band Edge for High Channel 2480MHz:

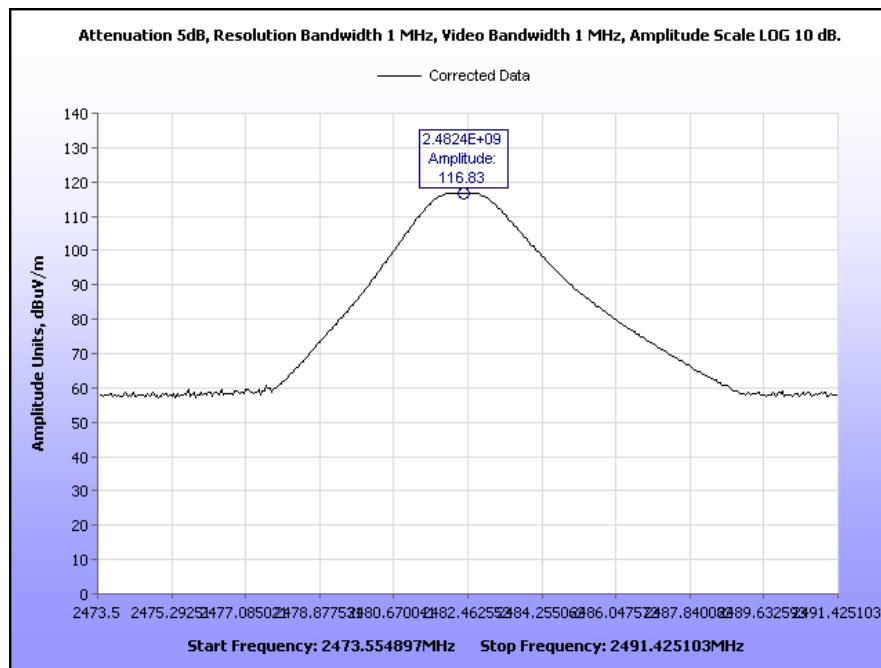
1. The field strength of the fundamental emission was measured using a 1MHz RBW and a 3MHz VBW for the peak value and a 1MHz RBW and a 10Hz VBW for the average value.
2. The spectrum analyzer was spanned to encompass both the peak of the fundamental emission and the band edge emission under investigation. The RBW was set to 1% of the span and the VBW to 3x the RBW. The delta between the peak levels of the fundamental emission at the relevant band edge emission was measured and recorded.
3. The resulting delta value was used to determine compliance.



Plot 27. Radiated Restricted Band Edge, Delta



Plot 28. Radiated Restricted Band Edge, High Channel Fundamental, Average



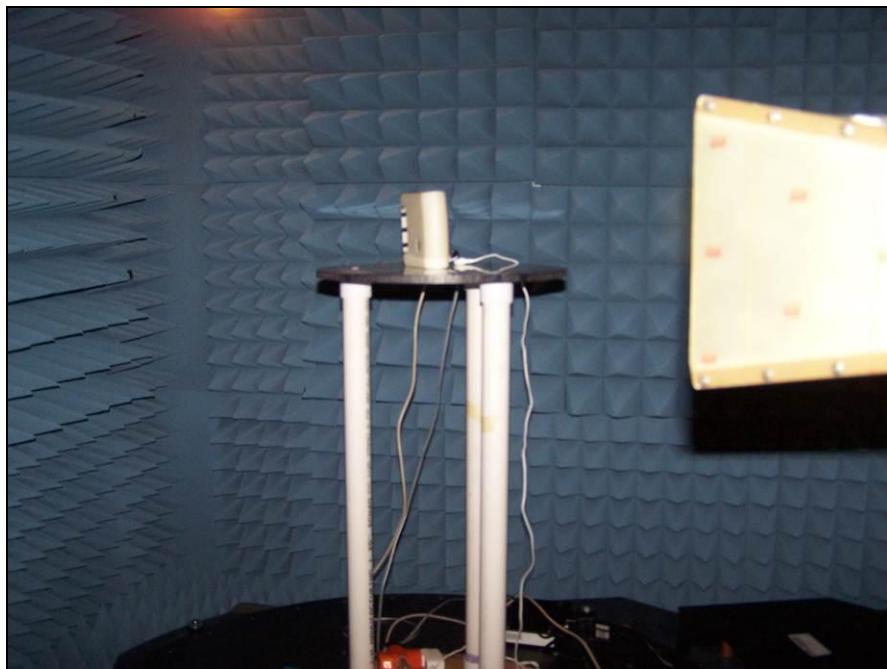
Plot 29. Radiated Restricted Band Edge, High Channel Fundamental, Peak

The fundamental Peak field strength = 116.83 dBuV/m @ 3m
The fundamental Average field strength = 72.37 dBuV/m @ 3m
Delta = 46.73 dB

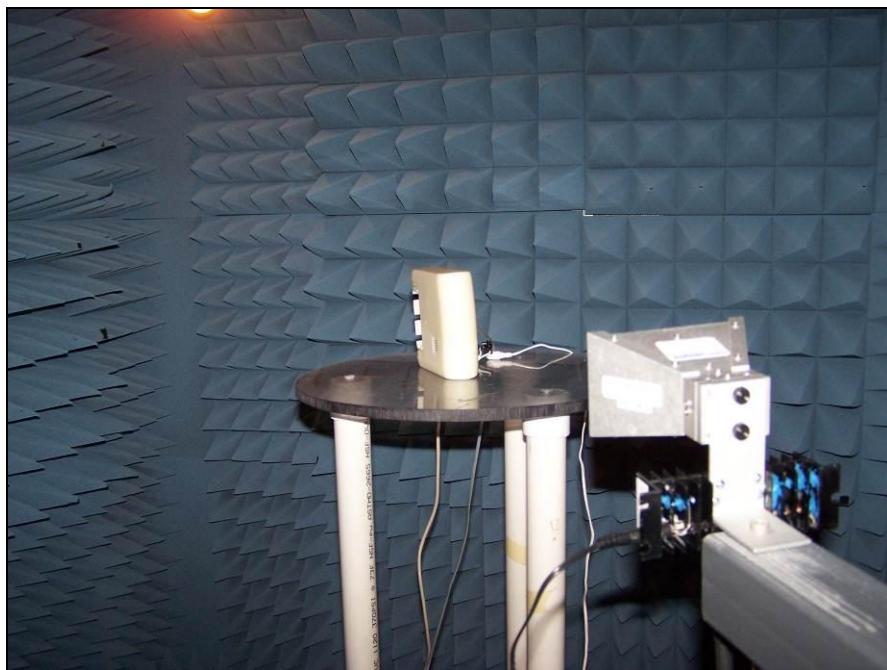
Therefore, the peak field strength at band edge = $116.83 - 46.73 = \mathbf{70.01 \text{ dBuV/m} @ 3m}$

Therefore, the average field strength at band edge = $72.37 - 46.73 = \mathbf{25.64 \text{ dBuV/m} @ 3m}$

Radiated Spurious Emissions Test Setup



Photograph 5. Radiated Spurious Emissions, Test Setup



Photograph 6. Radiated Spurious Emissions, Test Setup, Above 18 GHz

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

Test Requirement: **15.247(d)** In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB.

Test Procedure: For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

Test Results: The EUT was not applicable with the Conducted Spurious Emission limits of **§15.247(d)**. Measurements were made radiated.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(g)(h) Declaration Statements for FHSS



LifeShield Security
770 Township Line Road
Suite350
Yardley PA 19067

re: Model BSC1001

- i. The hopping sequence is pseudorandom, all channels are used equally on average, the receiver input bandwidth is approximately equal to the transmit bandwidth and the receiver hops in sequence with the transmitted signal.
- ii. The system is designed to comply with all the regulations in 15.247 when the transmitter is presented with a continuous data.
- iii. The system does not coordinate its channel selection/hopping sequence with other frequency hopping systems for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters.



A handwritten signature in black ink that reads "Gregory C Berlin".

Gregory C Berlin
Director Hardware Engineering

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(i) Maximum Permissible Exposure

RF Exposure Requirements: **§1.1307(b)(1) and §1.1307(b)(2):** Systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: **§1.1310:** As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

MPE Limit Calculation: EUT's operating frequencies between 2400 and 2483.5 MHz; Highest radiated power (EIRP) = 20.2 mW. Therefore, **Limit for Uncontrolled exposure: 1 mW/cm²**.

Equation from page 18 of OET 65, Edition 97-01

$$S = EIRP / 4\pi R^2$$

where,

S = Power Density mW/m²

EIRP = Equivalent Isotropic Radiated Power

R = Distance to the center of radiation of the antenna (20 cm for Mobile minimum distance)

$$EIRP = 20.2 \text{ mW}$$

$$S = 20.2 / 4(3.1416)(20)^2$$

$$S = 0.004 \text{ mW/cm}^2$$

Therefore, EUT meets the Uncontrolled Exposure limit at 20 cm.

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ANSI/NCSL Z540-1-1994 and ANSI/ISO/IEC 17025:2000.

| MET Asset # | Equipment | Manufacturer | Model | Last Cal Date | Cal Due Date |
|----------------|--------------------------------|------------------|-----------------------|---------------|--------------|
| 1T4621 | ESA-E SERIES SPECTRUM ANALYZER | AGILENT | E4402B | 05/10/2010 | 05/10/2011 |
| 1T4592 | RF FILTER KIT | VARIOUS | N/A | SEE NOTE | |
| 1T4300 | SEMI-ANECHOIC CHAMBER # 1 | EMC TEST SYSTEMS | NONE | 08/23/2010 | 08/23/2013 |
| 1T2511 | ANTENNA; HORN | EMCO | 3115 | 08/31/2010 | 08/31/2011 |
| 1T4744 | ANTENNA, HORN | ETS-LINDGREN | 3116 | 5/27/2010 | 5/27/2011 |
| S/N:MY50180138 | SPECTRUM ANALYZER | AGILENT | E4448A | 01/28/2010 | 01/28/2012 |
| 1T4354 | SIGNAL GENERATOR | HEWLETT PACKARD | 83752A | 03/11/2010 | 03/11/2011 |
| 1T4442 | PRE-AMPLIFIER, MICROWAVE | MITEQ | AFS42-01001800-30-10P | SEE NOTE | |
| 1T4752 | PRE-AMPLIFIER | MITEQ | JS44-18004000-35-8P | SEE NOTE | |

Table 19. Test Equipment List

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

(e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:

- (i) *Compliance testing;*
- (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
- (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
- (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production stages; or
- (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.

(e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.

(f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer,* be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

(a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.

(1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.

(i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*

(ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.

(2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

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

(1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., 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 condition that this device does not cause harmful interference.

(2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

(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 under paragraph (a) of this section is required to be affixed only to the main control unit.

(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.

§ 15.21 Information to user.

The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

(a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

(b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

End of Report