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Certification Test Report

FCC ID: SK9AMI-2A
IC: 864G-AMI2A

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

ACS Report Number 08-0339-900-DSS

Manufacturer: Itron Electricity Metering, Inc.
Model(s): CVSOR-A

Test Begin Date: September 18, 2008
Test End Date: September 24, 2008

Report Issue Date: October 2, 2008



FOR THE SCOPE OF ACCREDITATION UNDER LAB Code 200612-0

This report is not to be used to claim certification, approval, or endorsement by NVLAP, NIST or any government agency.

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This report contains 23 pages

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Additional Exhibits Included In Filing

Test Setup Photographs

1.0 GENERAL

1.1 Purpose

The purpose of this report is to demonstrate compliance with Part 15 Subpart C of the FCC's Code of Federal Regulations and Industry Canada's Radio Standards Specification RSS-210 for a Permissive Change.

This permissive change report is to address the replacement of the current 900 MHz transceiver chip with a transceiver chip that is a footprint compatible component with performance improvements and improved reliability due to internal construction of the part.

1.2 Product Description

1.2.1 General

The CENTRON OpenWay meter is used for measuring electrical energy consumption. The CENTRON OpenWay meter incorporates a two-piece design combining a base metrology with a variety of OpenWay registers or options. The metrology portion of the meter contains all measurement circuitry and calibration information, while the personality modules contain the register functionality and communication mediums.

Each version of the meter is distinguished by the various personality modules or option boards that mount to the standard meter metrology base. For the purpose of this report, only the CENTRON OpenWay CVSOR-A meter type was evaluated.

The CVSOR-A register board contains (1) 900 MHz LAN frequency hopping spread spectrum radio and (1) 2.4 GHz direct sequence spread spectrum Zigbee radio. The Cell Relay Core board, located in the meter base, contains (1) low power 2.4 GHz direct sequence spread spectrum Zigbee radio.

The CVSOR-A also incorporates a pre-approved 850/1900 GPRS modem module FCC ID: MIVGSM0108.

Manufacturer Information:
Itron Electricity Metering, Inc.
313 North Highway 11
West Union, SC 29696

Test Sample Serial Number(s):
55 048 108

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

Detailed photographs of the EUT are filed separately with this filing.

1.2.2 Intended Use

The CENTRON OpenWay meter is used for measuring electrical energy consumption.

1.3 Test Methodology and Considerations

This device is considered a composite device by definition. The 900 MHz LAN radio and the 2.4 GHz Zigbee radios operate under CFR 47 Part 15.247 and IC RSS-210. This report addresses the 900 MHz permissive change test data only considering only changes to the 900MHz radio where made.

2.0 TEST FACILITIES

2.1 Location

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

Advanced Compliance Solutions
5015 B.U. Bowman Drive
Buford, GA 30518
Phone: (770) 831-8048
Fax: (770) 831-8598

2.2 Laboratory Accreditations/Recognitions/Certifications

The Semi-Anechoic Chamber Test Site, Open Area Test Site (OATS) and Conducted Emissions Site have been fully described, submitted to, and accepted by the FCC, Industry Canada and the Japanese Voluntary Control Council for Interference by information technology equipment. In addition, ACS is compliant to ISO 17025 as certified by the National Institute of Standards and Technology under their National Voluntary Laboratory Accreditation Program. The following certification numbers have been issued in recognition of these accreditations and certifications:

FCC Registration Number: 894540

Industry Canada Lab Code: IC 4175

VCCI Member Number: 1831

- VCCI OATS Registration Number R-1526
- VCCI Conducted Emissions Site Registration Number: C-1608

NVLAP Lab Code: 200612-0

2.3 Radiated Emissions Test Site Description

2.3.1 Semi-Anechoic Chamber Test Site

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

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

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

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

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

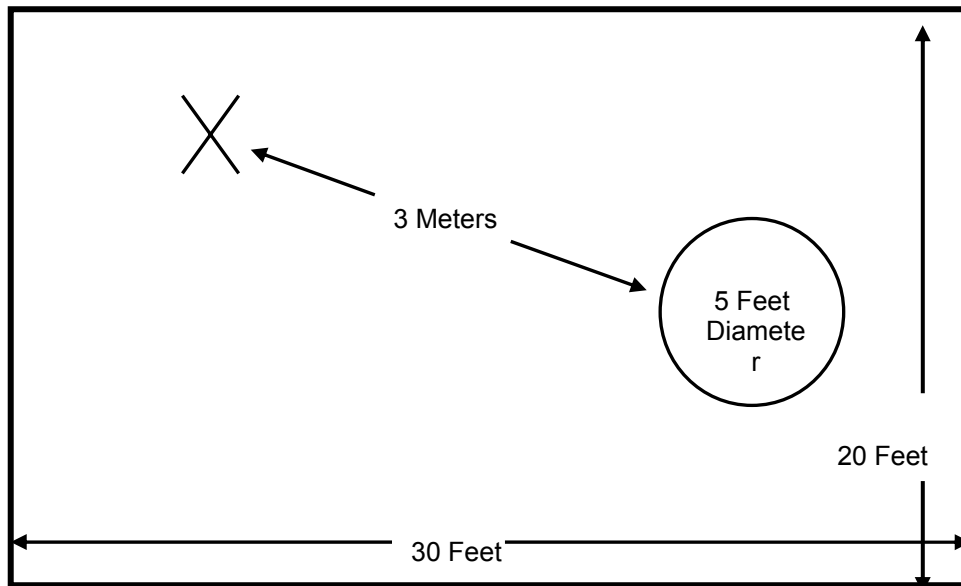


Figure 2.3-1: Semi-Anechoic Chamber Test Site

2.3.2 Open Area Tests Site (OATS)

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

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

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

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

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

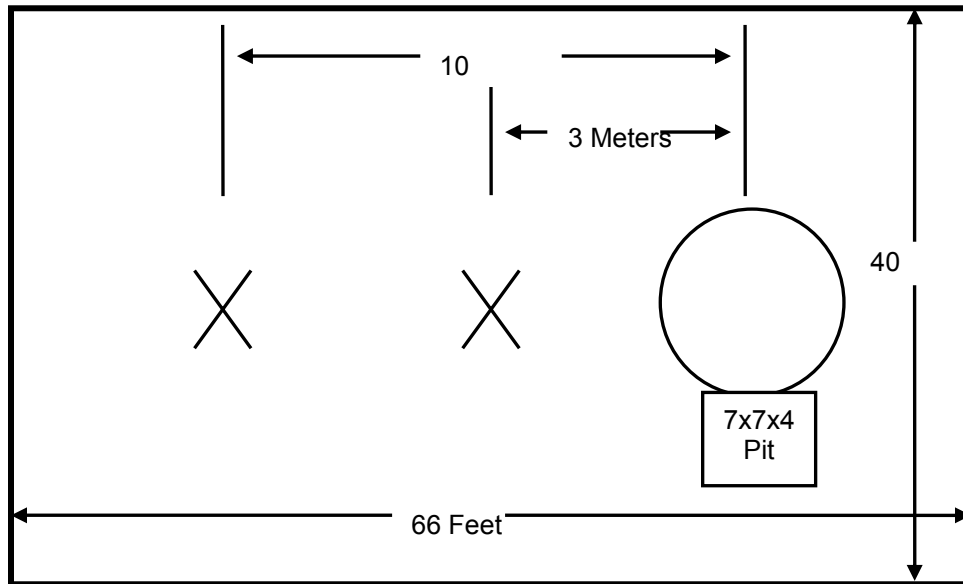


Figure 2.3-2: Open Area Test Site

2.4 Conducted Emissions Test Site Description

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

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

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

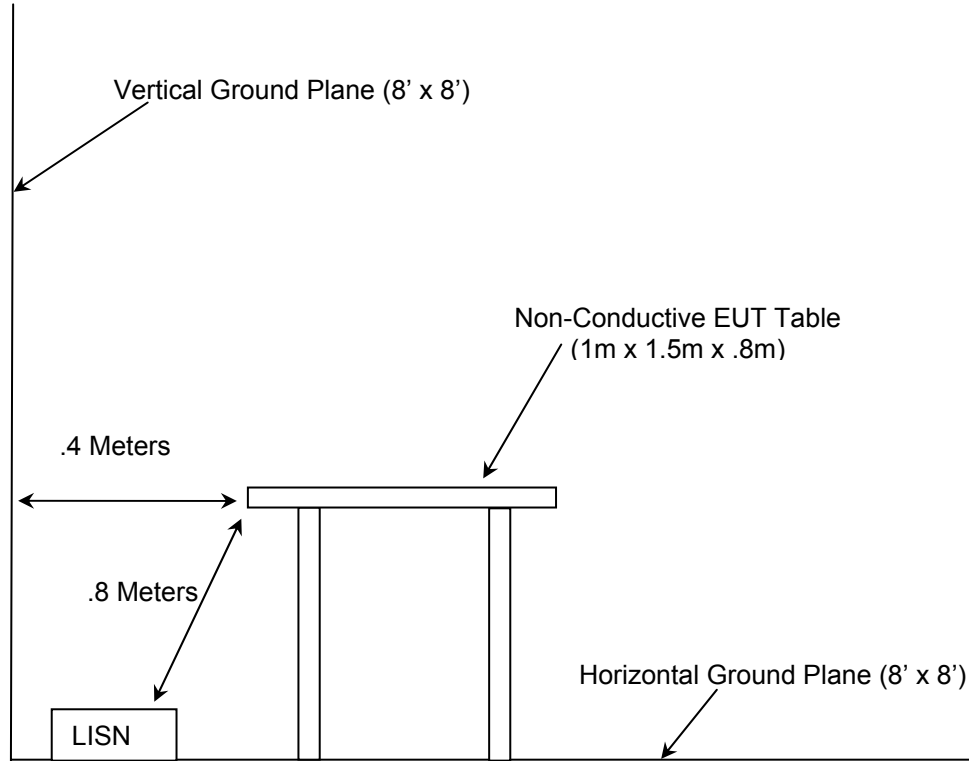


Figure 2.4-1: AC Mains Conducted EMI Site

3.0 APPLICABLE STANDARD REFERENCES

The following standards were used:

- ❖ ANSI C63.4-2003: Method of Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the 9KHz to 40GHz
- ❖ US Code of Federal Regulations (CFR): Title 47, Part 2, Subpart J: Equipment Authorization Procedures, 2008
- ❖ US Code of Federal Regulations (CFR): Title 47, Part 15, Subpart C: Radio Frequency Devices, Intentional Radiators, 2008
- ❖ FCC Public Notice DA 00-705 - Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems, March 30, 2000
- ❖ Industry Canada Radio Standards Specification: RSS-210 - Low-power License-exempt Radiocommunication Devices (All Frequency Bands): Category I Equipment, Issue 7 June 2007
- ❖ Industry Canada Radio Standards Specification: RSS-GEN – General Requirements and Information for the Certification of Radiocommunication Equipment, Issue 2 June 2007.

4.0 LIST OF TEST EQUIPMENT

All test equipment used for regulatory testing is calibrated yearly or according to manufacturer's specifications.

Table 4-1: Test Equipment

Equipment Calibration Information					
Asset#	Mfg.	Eq. type	Model	S/N	Cal. Due
337	Microwave Circuits	Filter	H1G513G1	282706	04/08/09
22	Agilent	Amplifier	8449B	3008A00526	10/25/08
30	Spectrum Technologies	Antenna	DRH-0118	970102	05/07/09
291	Florida RF Labs	Cable	SMRE-200W-12.0-SMRE	none	11/21/08
292	Florida RF Labs	Cable	SMR-290AW-480.0-SMR	none	11/21/08
422	Florida RF Labs	Cable	SMS-200AW-72.0-SMR	805	02/25/09
1	Rohde & Schwarz	Spectrum Analyzer	ESMI - Display	833771/007	10/26/08
2	Rohde & Schwarz	Spectrum Analyzer	ESMI - Receiver	839587/003	10/26/08
282	Rohde & Schwarz	Spectrum Analyzer	FSP40	1000033	11/09/08
431	Solar Electronics	LISN	9408-50-R-25-N	84701	06/19/09
324	ACS	Cable	Cable	8214	07/28/09
168	Hewlett Packard	Attenuator	11947A	44829	02/18/09
167	ACS	Cable Set	Chamber EMI Set	167	01/04/09
25	Chase	Antenna	CBL6111	1043	08/22/09
73	Agilent	Amplifier	8447D	2727A05624	12/19/08

5.0 SUPPORT EQUIPMENT

Table 5-1: Support Equipment

Manufacturer	Equipment Type	Model Number	Serial Number	FCC ID
EUT Was Self Supporting				

6.0 EQUIPMENT UNDER TEST SETUP BLOCK DIAGRAM

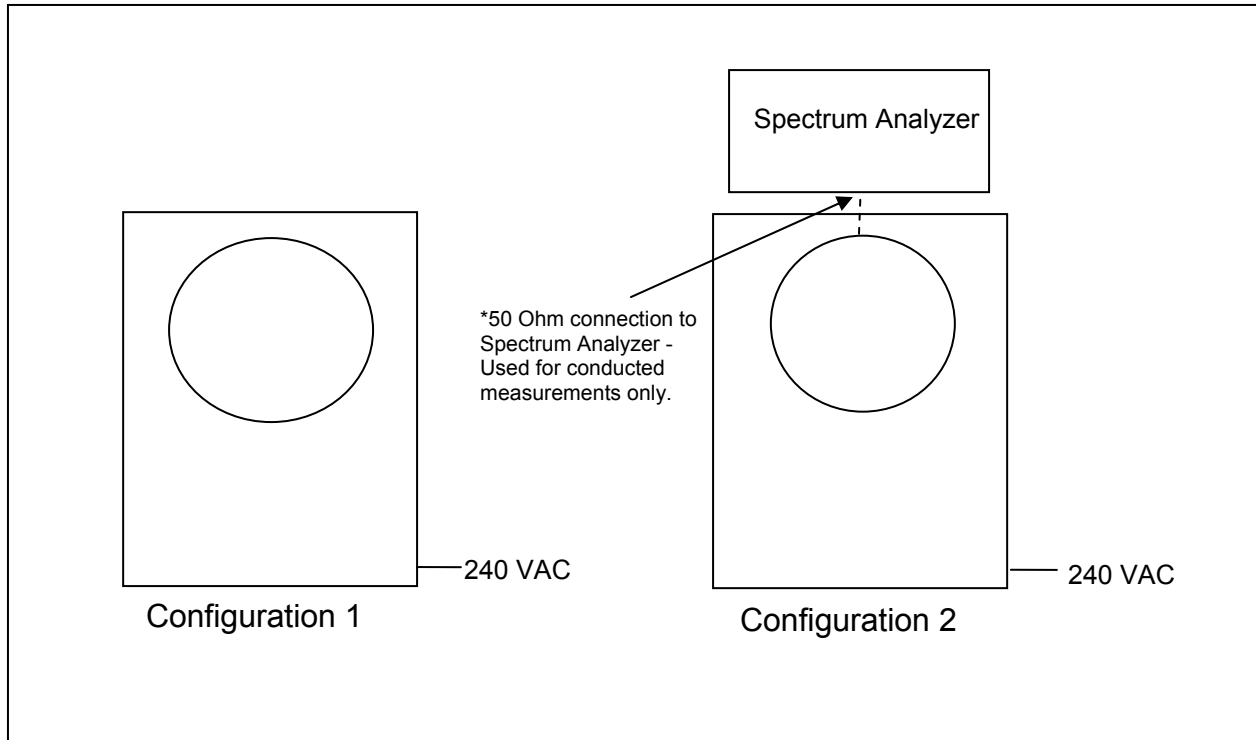


Figure 6-1: EUT Test Setup

* The EUT was configured with 50 Ohm temporary RF output ports for conducted RF measurements to facilitate a direct connection to a spectrum analyzer.

See Test Setup photographs for additional detail.

7.0 SUMMARY OF TESTS

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

7.1 Antenna Requirement – FCC: Section 15.203

The antenna is an integrated single-band patch antenna which can not be altered without destroying the device. This device is also professionally installed therefore meeting the requirements of CFR 47 Part 15.203.

7.2 Power Line Conducted Emissions – FCC: Section 15.207 IC: RSS-Gen 7.2.2

7.2.1 Test Methodology

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

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

7.2.2 Test Results

Results of the test are shown below in Tables 7.2-1 through 7.2-3.

Table 7.2-1: Conducted EMI Results

Frequency (MHz)	Uncorrected Reading (dBuV)		Total Correction Factor (dB)	Corrected Level (dBuV)		Limit (dBuV)		Margin (dB)		Line
	Quasi-Peak	Average		Quasi-Peak	Average	Quasi-Peak	Average	Quasi-Peak	Average	
Line 1										
0.17	36.3	32.7	9.81	46.11	42.51	64.96	54.96	18.8	12.4	GND
0.26	34.6	31.1	9.81	44.41	40.91	61.43	51.43	17.0	10.5	GND
0.34	34.8	31.1	9.81	44.61	40.91	59.20	49.20	14.6	8.3	GND
0.46	32	28.4	9.90	41.90	38.30	56.69	46.69	14.8	8.4	GND
0.53	31.3	27.7	9.90	41.20	37.60	56.00	46.00	14.8	8.4	GND
0.68	28.8	24	9.90	38.70	33.90	56.00	46.00	17.3	12.1	GND
Line 2										
0.28	35.1	31.7	9.82	44.92	41.52	60.82	50.82	15.9	9.3	GND
0.33	34.9	30.9	9.81	44.71	40.71	59.45	49.45	14.7	8.7	GND
0.4	33.5	30	9.90	43.40	39.90	57.85	47.85	14.5	8.0	GND
0.51	32.4	28.7	9.90	42.30	38.60	56.00	46.00	13.7	7.4	GND
0.67	30	25.1	9.90	39.90	35.00	56.00	46.00	16.1	11.0	GND
0.84	22.4	17.2	9.90	32.30	27.10	56.00	46.00	23.7	18.9	GND

7.3 Radiated Emissions – FCC: Section 15.109(Unintentional Radiation) IC: RSS-210 2.6

7.3.1 Test Methodology

Radiated emissions tests were performed over the frequency range of 30MHz to 5GHz. Measurements of the radiated field strength were made at a distance of 3m from the boundary of the equipment under test (EUT) and the receiving antenna. The antenna height was varied from 1m to 4m so that the maximum radiated emissions level would be detected. Radiated measurements above 30MHz and below 1GHz were made with the Spectrum Analyzer's resolution bandwidth set to 120 KHz using a Quasi-peak detector. For frequencies above 1000MHz, peak and average measurements made with RBW of 1 MHz and VBW of 3 MHz.

7.3.2 Test Results

Results of the test are given in Table 7.3-1 below:

Table 7.3-1: Radiated Emissions Tabulated Data

Frequency (MHz)	Level (dBuV)		Antenna Polarity (H/V)	Correction Factors (dB)	Corrected Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg			pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
102.211	-----	29.11	V	-13.48	-----	15.63	-----	43.5	-----	27.87
129.051	-----	32.33	V	-12.30	-----	20.03	-----	43.5	-----	23.47
215.982	-----	34.85	H	-15.20	-----	19.65	-----	43.5	-----	23.85
302.295	-----	43.99	H	-11.65	-----	32.34	-----	46.0	-----	13.66
350.084	-----	39.54	H	-9.80	-----	29.74	-----	46.0	-----	16.26
950.032	-----	19.69	V	3.70	-----	23.39	-----	46.0	-----	22.61

* Note: All emissions above 950.032 MHz were attenuated below the permissible limit.

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

7.4.1 Test Methodology (Conducted Method)

The 20dB bandwidth of the EUT was within the resolution bandwidth of spectrum analyzer, therefore the power measurement was made using the spectrum analyzer method. The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The resolution and video bandwidth were set to > 20 dB bandwidth of the emission measured. The device employs ≥ 50 channels therefore the power is limited to 1 Watt.

7.4.2 Test Results

Results are shown below in table 7.4-1 and plots shown in figures 7.4-1 to 7.4-3 below:

Table 7.4-1: RF Output Power

Frequency [MHz]	Level [dBm]
902.25	21.50
915.00	20.56
927.75	20.41

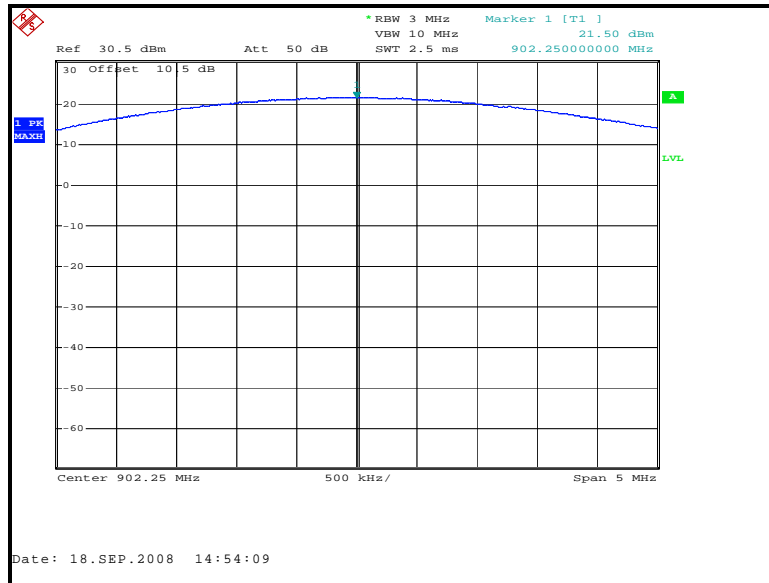


Figure 7.4-1: Output power – Low Channel

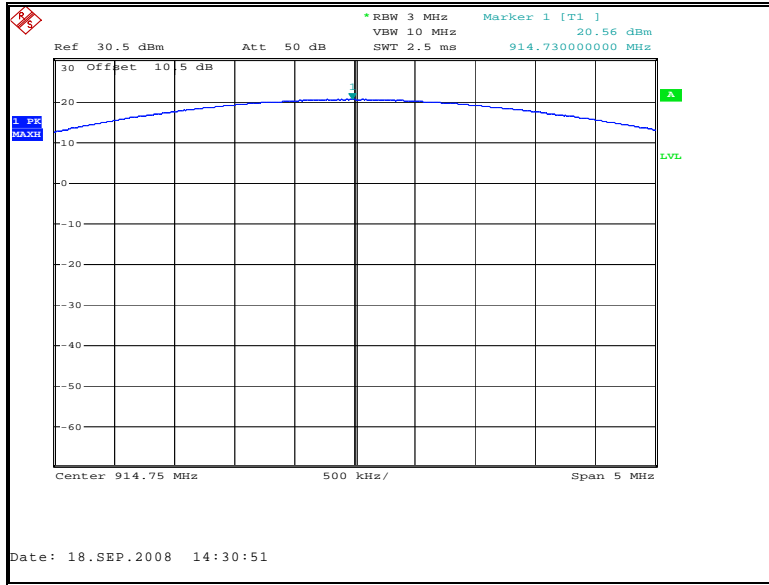


Figure 7.4-2: Output power – Mid Channel

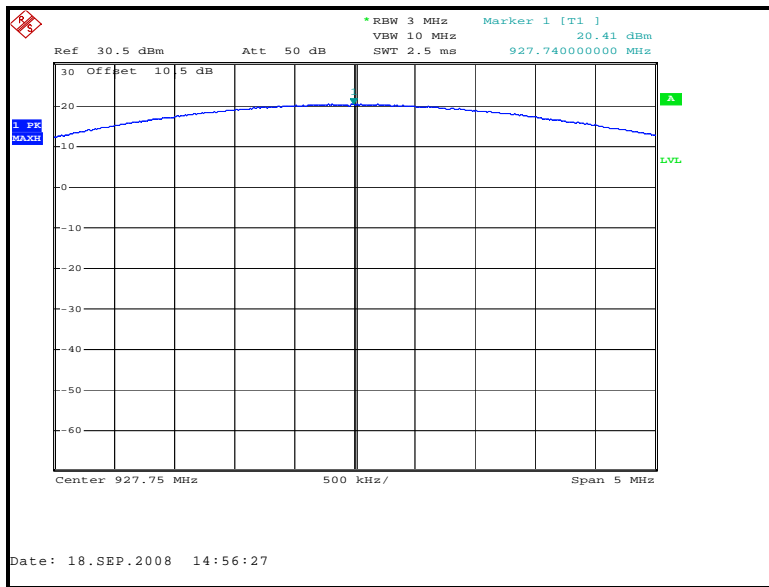


Figure 7.4-3: Output power – High Channel

7.5 Channel Usage Requirements

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

7.5.1.1 Test Methodology

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

7.5.1.2 Test Results

The maximum 20dB bandwidth of the hopping channel was measured to be 147kHz (See figure 7.5.4-1 to 7.5.4-3 below). The adjacent channel separation was measured to be 500kHz. Results are shown in figure 7.5.1-1 below:

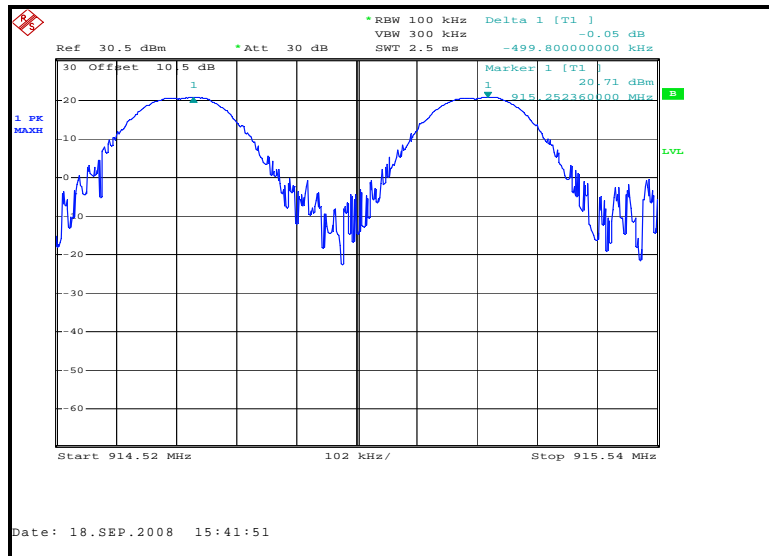


Figure 7.5.1-1: Carrier Frequency Separation

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

The 20dB bandwidth of the device is less than 250 kHz. The device employs ≥ 50 hopping channels as required. Results are shown in Figure 7.5.2-1 below:

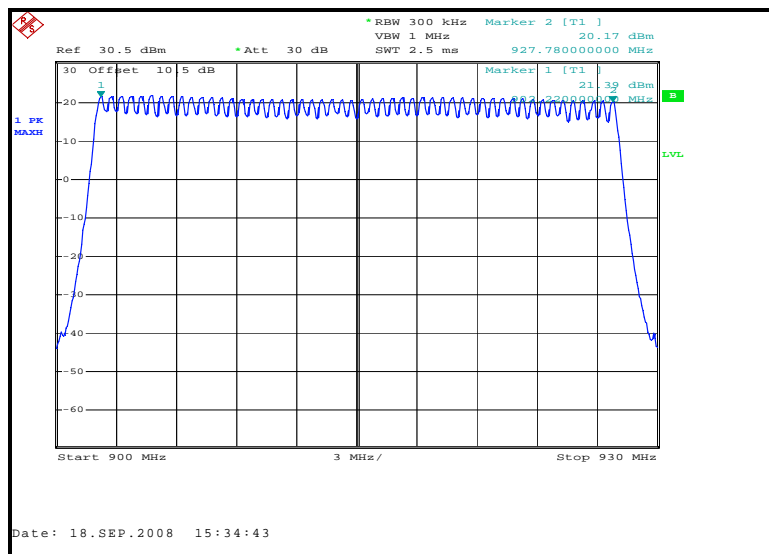


Figure 7.5.2-1: Number of Hopping Channels

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

7.5.3.1 Test Methodology

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The hopping channel is centered on the analyzer and the span set to 0 Hz. The RBW was set to 1 MHz and the VBW to 3 MHz. Sweep time was set to 200 ms to capture the burst duration of the emission. The marker – delta function of the analyzer was employed to measure the burst duration.

7.5.3.2 Test Results

The duration of the RF transmission is 123.2 ms. There is a minimum 7.8 second rest period in which the device hops to another channel according to the pseudorandom frequency table before transmitting another 123.2ms burst. Therefore the average time of occupancy on any channel in a 20 second period is 369ms. A single transmission is shown in figure 7.5.3-1 below:

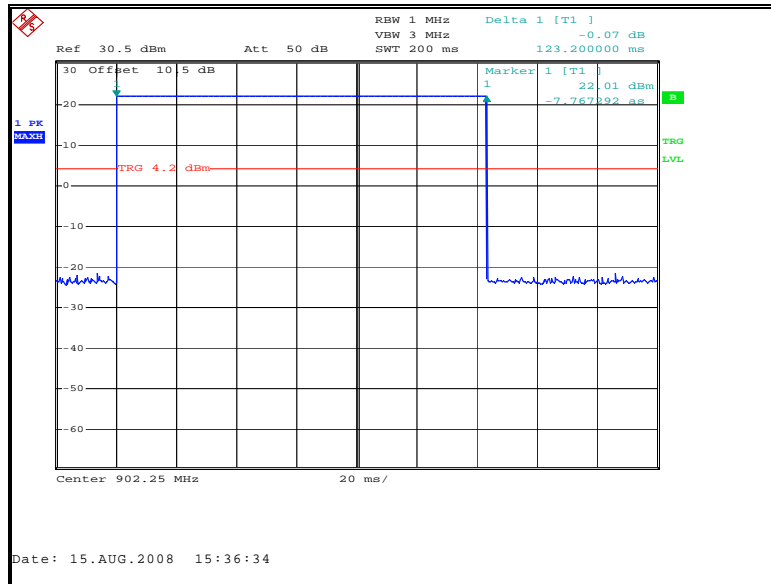


Figure 7.5.3-1: Channel Dwell Time

7.5.4 20dB Bandwidth – FCC: Section 15.247(a)(1)(i) IC: RSS-210 A8.1(c)

7.5.4.1 Test Methodology

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The spectrum analyzer span was set to 2 to 3 times the estimated 20 dB bandwidth of the emission. The RBW was to $\geq 1\%$ of the estimated 20 dB bandwidth. The trace was set to max hold with a peak detector active. The Delta function of the analyzer was utilized to determine the 20 dB bandwidth of the emission. The span and RBW were examined and re-adjusted if necessary to meet the requirements of 2 to 3 times the 20 bandwidth for the span and $\geq 1\%$ of the 20 dB bandwidth for the RBW.

7.5.4.2 Test Results

The maximum 20dB bandwidth was found to be approximately 147kHz. Results are shown below in Table 7.5.4-1 and Figures 7.5.4-1 through 7.5.4-3.

Table 7.5.4-1

Frequency (MHz)	20dB Bandwidth (kHz)
902.25	143
915.00	143
927.75	147

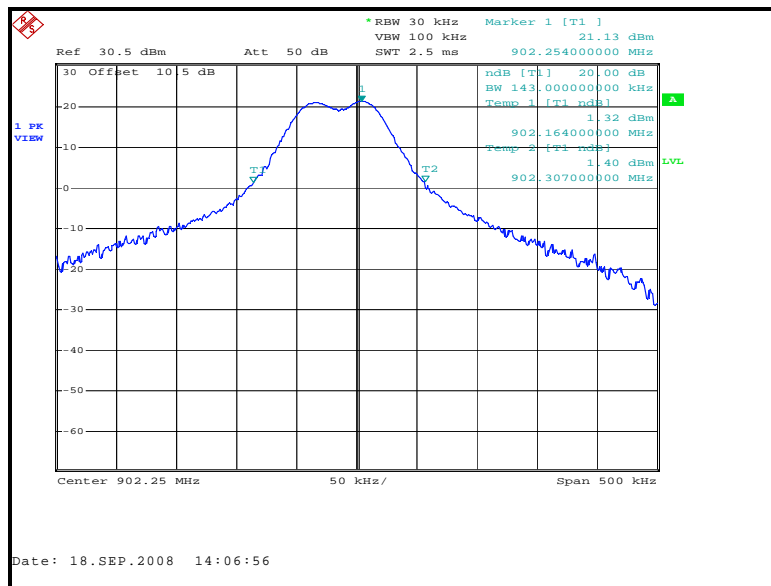


Figure 7.5.4-1: 20dB Bandwidth Low Channel

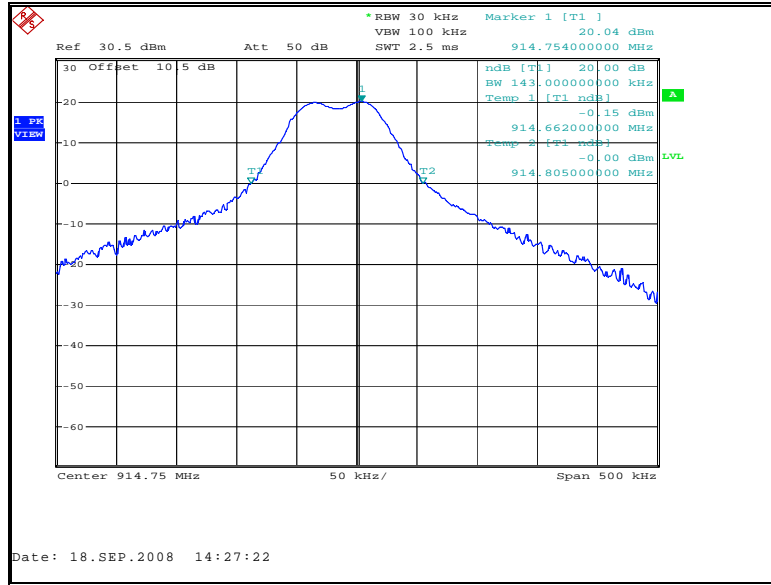


Figure 7.5.4-2: 20dB Bandwidth Mid Channel

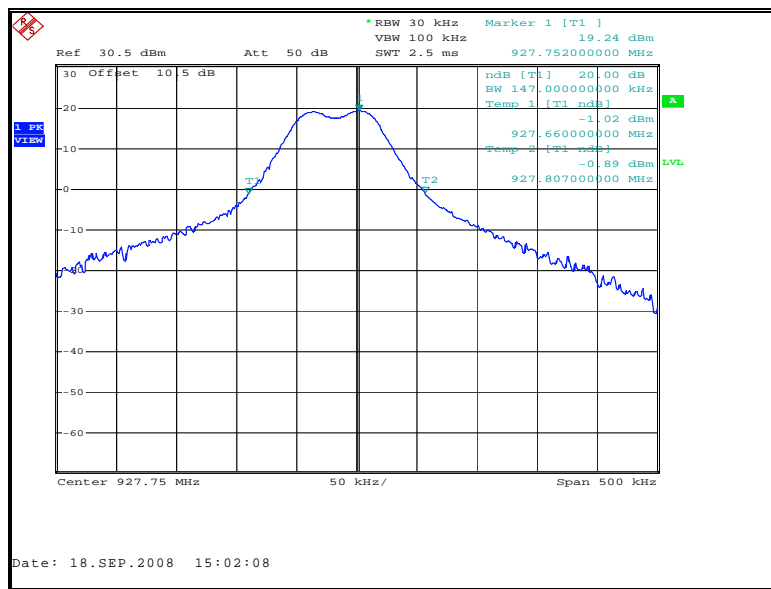


Figure 7.5.4-3: 20dB Bandwidth High Channel

7.6 Band-Edge Compliance and Spurious Emissions - FCC Section 15.247(d) IC: RSS-210 2.6, A8.5

7.6.1 Band-Edge Compliance of RF Conducted Emissions

7.6.1.1 Test Methodology

The RF output port of the EUT was directly connected to the input of the spectrum analyzer. The EUT was investigated at the lowest and highest channel available to determine band-edge compliance. For each measurement the spectrum analyzer's RBW was set to 30 kHz, which is $\geq 1\%$ of the span, and the VBW was set to 100kHz.

7.6.1.2 Test Results

At the lower and upper band-edge, the radio frequency power that was produced by the EUT is at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of desired power. Band-edge compliance is displayed in Figures 7.6.1-1 and 7.6.2-4.

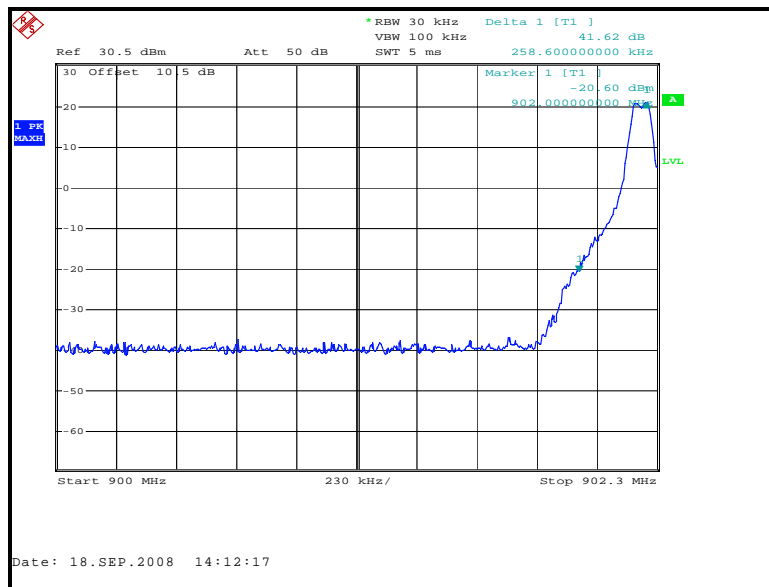


Figure 7.6.1-1: Lower Band-edge

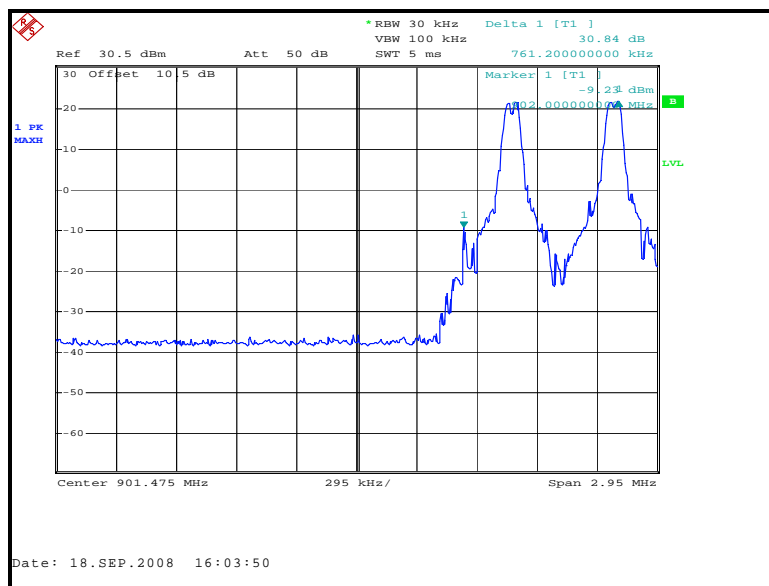


Figure 7.6.1-2: Lower Band-edge – Hopping

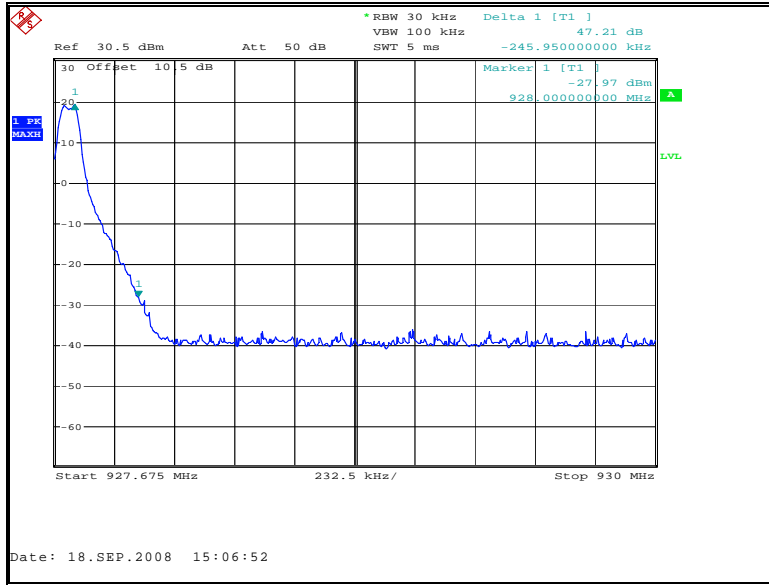


Figure 7.6.1-3: Upper Band-edge

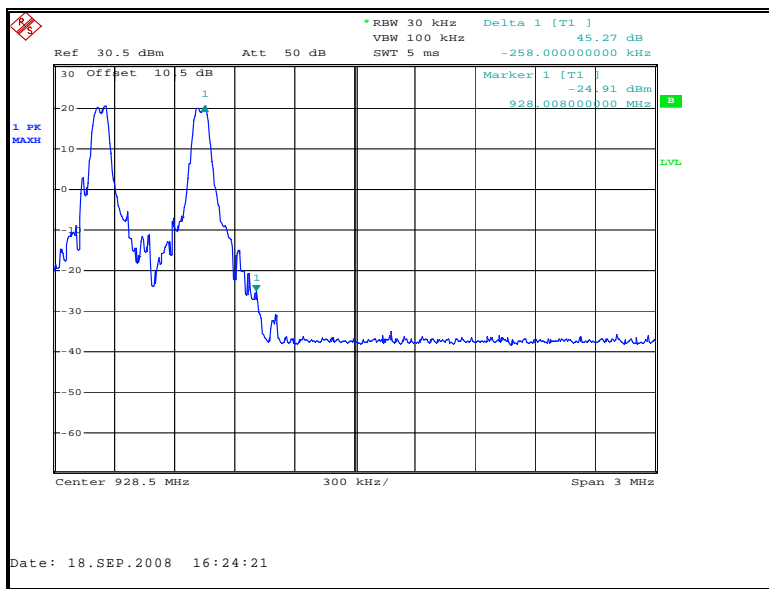


Figure 7.6.1-4: Upper Band-edge - Hopping

7.6.2 RF Conducted Spurious Emissions

7.6.2.1 Test Methodology

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

7.6.2.1 Test Results

All emission found were greater than 20dB down from the fundamental carrier. The RF conducted spurious emissions were measured in the band of 30MHz to 10GHz. Results are shown below in Figure 7.6.2-1 through 7.6.2-6.

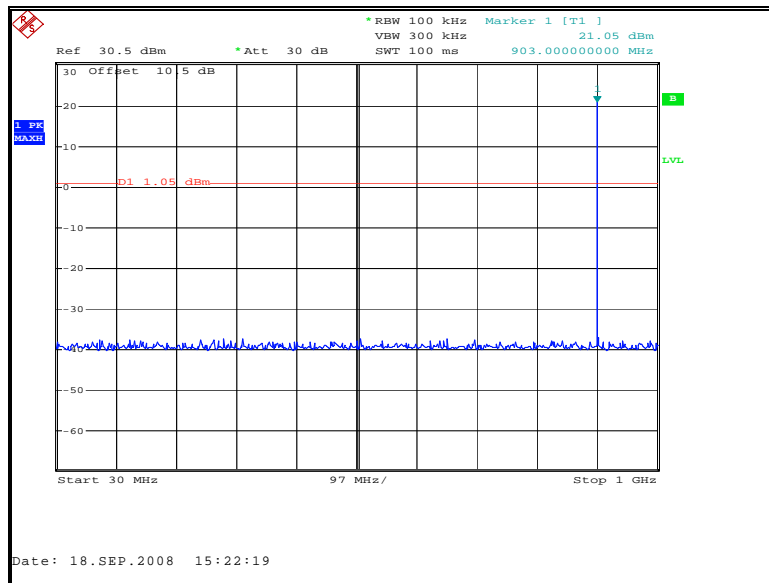


Figure 7.6.2-1 RF Conducted Spurious Emissions – Low Channel

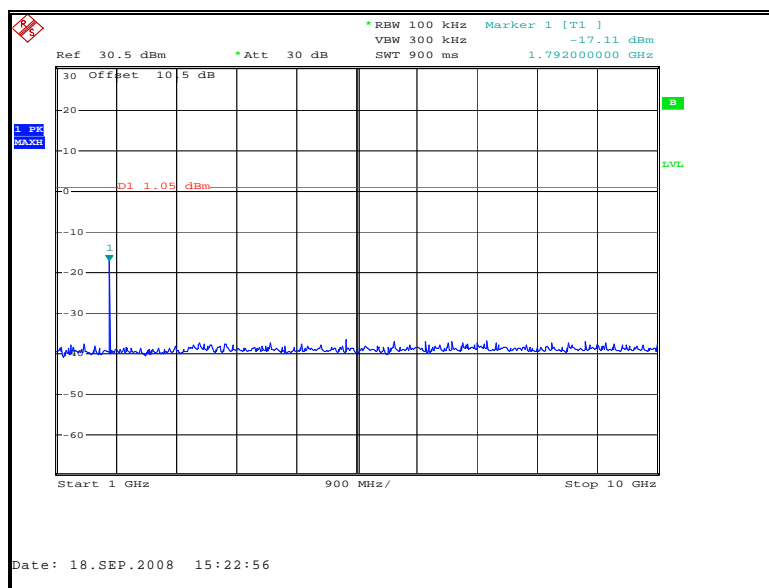


Figure 7.6.2-2 RF Conducted Spurious Emissions – Low Channel

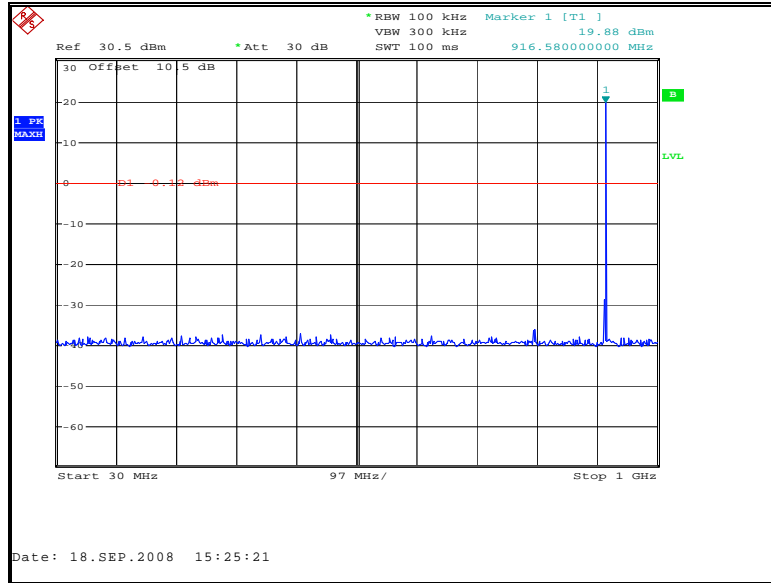


Figure 7.6.2-3 RF Conducted Spurious Emissions – Mid Channel

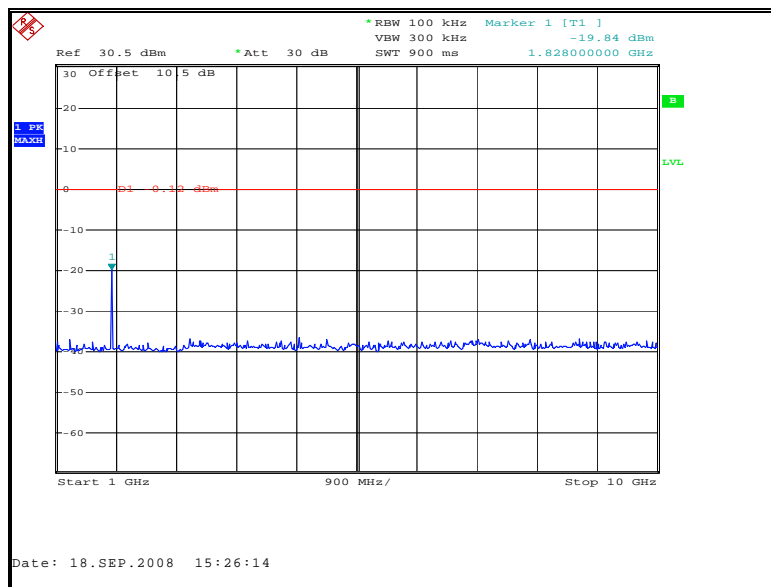


Figure 7.6.2-4 RF Conducted Spurious Emissions – Mid Channel

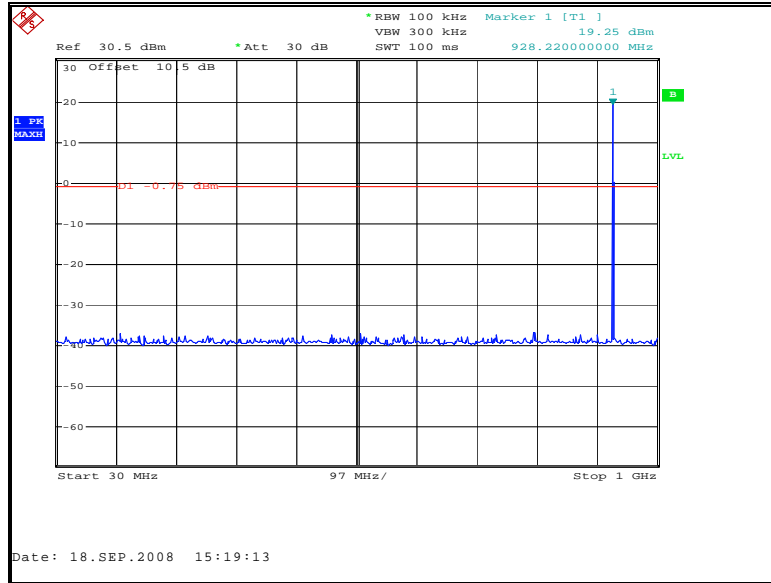


Figure 7.6.2-5 RF Conducted Spurious Emissions – High Channel

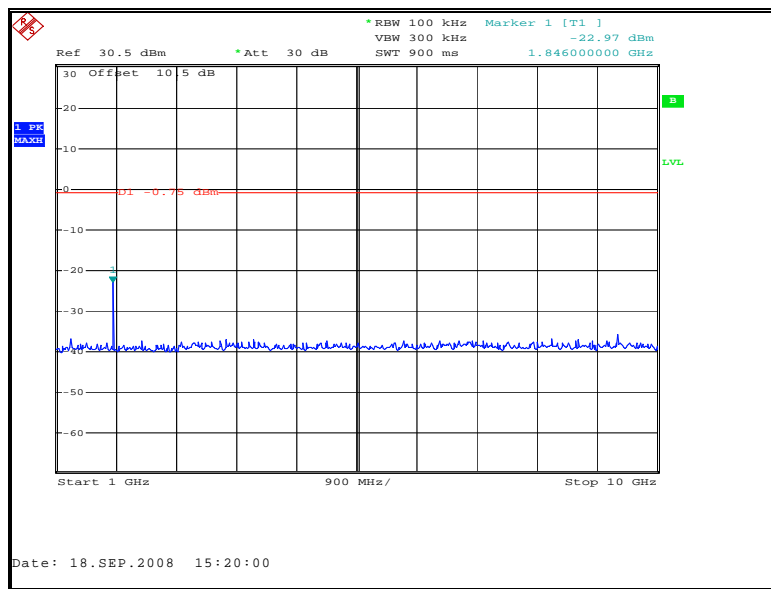


Figure 7.6.2-6 RF Conducted Spurious Emissions – High Channel

7.6.3 Radiated Spurious Emissions – Intentional Radiation (Restricted Bands)

7.6.3.1 Test Methodology

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

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

7.6.3.3 Test Results

Table 7.6.3-1 Radiated Intentional Emissions

Frequency (MHz)	Level (dBuV)		Antenna Polarity (H/V)	Correction Factors (dB)	Corrected Level (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
	pk	Qpk/Avg			pk	Qpk/Avg	pk	Qpk/Avg	pk	Qpk/Avg
Spurious Emissions - Low Channel										
2706.75	46.84	46.84	H	0.74	47.58	47.58	74.0	54.0	26.42	6.42
2706.75	47.71	47.71	V	0.54	48.25	48.25	74.0	54.0	25.75	5.75
3609	43.03	43.03	H	3.61	46.64	46.64	74.0	54.0	27.36	7.36
3609	45.19	45.19	V	3.63	48.82	48.82	74.0	54.0	25.18	5.18
Spurious Emissions - Mid Channel										
2744.25	45.55	45.55	H	0.80	46.35	46.35	74.0	54.0	27.65	7.65
2744.25	46.72	46.72	V	0.60	47.32	47.32	74.0	54.0	26.68	6.68
3659	43.85	43.85	H	3.84	47.69	47.69	74.0	54.0	26.31	6.31
3659	43.47	43.47	V	3.87	47.34	47.34	74.0	54.0	26.66	6.66
Spurious Emissions - High Channel										
2783.25	45.70	45.70	H	0.85	46.55	46.55	74.0	54.0	27.45	7.45
2783.25	46.61	46.61	V	0.65	47.26	47.26	74.0	54.0	26.74	6.74
4638.75	43.67	43.67	H	6.34	50.01	50.01	74.0	54.0	23.99	3.99

* The magnitude of all emissions not reported were below the noise floor of the measurement system and below the permissible limit.

7.6.3.4 Sample Calculation:

$$R_C = R_U + CF_T$$

Where:

- CF_T = Total Correction Factor (AF+CA+AG)
- R_U = Uncorrected Reading
- R_C = Corrected Level
- AF = Antenna Factor
- CA = Cable Attenuation
- AG = Amplifier Gain

Example Calculation: Peak

Corrected Level: 46.84+ 0.74= 47.58dBuV/m
 Margin: 74dBuV/m – 46.84dBuV/m = 26.42dB

Example Calculation: Average

Corrected Level: 46.84+ 0.74 - 0 = 47.58dBuV
 Margin: 54dBuV – 47.58dBuV = 6.42dB

8.0 CONCLUSION

In the opinion of ACS, Inc. the CVSOR-A, manufactured by Itron Electricity Metering, Inc. meets the requirements of FCC Part 15 subpart C and Industry Canada’s Radio Standards Specification RSS-210.

END REPORT