

Nemko-CCL, Inc.
1940 West Alexander Street
Salt Lake City, UT 84119
801-972-6146

Test Report

Certification

Test Of:

TRAFIR315LMD21K

Test Specifications:

FCC Part 15, Subpart C

FCC ID #:

SU7315LMD21K

Test Report Serial No: 149163-2.1

Applicant:

Controlled Entry Distributors, Inc.
DBA Community Controls
2500 South 3850 West, Suite A
Salt Lake City, UT 84120
U.S.A.

Date of Test: October 12, 2010

Issue Date: October 14, 2010

Accredited Testing Laboratory By:



NVLAP Lab Code 100272-0

CERTIFICATION OF ENGINEERING REPORT

This report has been prepared by Nemko-CCL, Inc. to document compliance of the device described below with the certification requirements of FCC Part 15, Subpart C. This report may be reproduced in full. Partial reproduction of this report may only be made with the written consent of the laboratory. The results in this report apply only to the sample tested.

- Applicant: Controlled Entry Distributors, Inc.
- Manufacturer: Lighting Tech Co., LTD
- Brand Name: Firefly
- Model Number: TRAFIR315LMD21K
- FCC ID #: SU7315LMD21K

On this 14th day of October 2010, I, individually, and for Nemko-CCL, Inc., certify that the statements made in this engineering report are true, complete, and correct to the best of my knowledge, and are made in good faith.

Although NVLAP has accredited the Nemko-CCL, Inc. EMC testing facilities, this report must not be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

Nemko-CCL, Inc.



Tested by: Norman P. Hansen
EMC Technician

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SECTION 1.0 CLIENT INFORMATION

1.1 Applicant:

Company Name: Controlled Entry Distributors, Inc.
 DBA Community Controls
 2500 South 3850 West, Suite A
 Salt Lake City, UT 84120
 U.S.A.

Contact Name: Brad Kofford
Title: President

1.2 Manufacturer:

Company Name: Lighting Tech Co., LTD
 4F, No. 124 Hua Chen Rd.
 Hsing Chuang City, Taipei Hsien
 Taiwan, R.O.C.

Contact Name: N. J. Duan
Title: Sales Manager

SECTION 2.0 EQUIPMENT UNDER TEST (EUT)

2.1 Identification of EUT:

Brand Name: Firefly
 Model Number: TRAFIR315LMD21K
 Serial Number: None
 Country of Manufacture: Taiwan

2.2 Description of EUT:

The TRAFIR315LMD21K is a transmitter operating at 315 MHz using ASK modulation. The TRAFIR315LMD21K is designed for door and entry systems operating at 315 MHz. The transmitter is powered by an A23S 12 Vdc battery.

2.3 EUT and Support Equipment:

The FCC ID numbers for all the EUT and support equipment used during the test are listed below:

Brand Name Model Number Serial Number	FCC ID Number or Compliance	Description	Name of Interface Ports / Interface Cables
BN: Firefly MN: TRAFIR315LMD21K (Note 1) SN: None	SU7315LMD21K	315 MHz Transmitter	See Section 2.4

Note: (1) EUT

2.4 Interface Ports on EUT:

There are no interface ports on the EUT.

2.5 Modification Incorporated/Special Accessories on EUT:

There were no modifications or special accessories required to comply with the specification. This report is not complete without an accompanying signed attestation, included as Appendix 3, that the product will have all of the documented modifications incorporated into the product when manufactured and placed on the market.

SECTION 3.0 TEST SPECIFICATION, METHODS & PROCEDURES

3.1 Test Specification:

Title: FCC PART 15, Subpart C (47 CFR 15)
Section 15.203
Section 15.231

Periodic operation in the band 40.66-40.70 MHz and above 70 MHz.

Purpose of Test: The tests were performed to demonstrate initial compliance.

3.2 Methods & Procedures:

3.2.1 §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. This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with Section 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this Part are not exceeded.

3.2.2 §15.231

(a) The provisions of this section are restricted to periodic operation within the band 40.66-40.70 MHz and above 70 MHz. Except as Shown in paragraph (e) of this section, the intentional radiator is restricted to the transmission of a control signal such as those used with alarm systems, door openers, remote switches, etc. Radio control of toys is not permitted. Continuous transmissions, such as voice or video, and data transmissions are not permitted. The prohibition against data transmissions does not preclude the use of recognition codes. Those codes are used to identify the sensor that is activated or to identify the particular component as being part of the system. The following conditions shall be met to comply with the provisions for this periodic operation:

(1) A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released.

(2) A transmitter activated automatically shall cease transmission within 5 seconds after activation.

(3) Periodic transmissions at regular predetermined intervals are not permitted. However, polling or supervision transmission to determine system integrity of transmitters used in security or safety applications are allowed if the periodic rate of transmission does not exceed one transmission of not more than one second duration per hour for each transmitter.

(4) Intentional radiators which are employed for radio control purposes during emergencies involving fire, security, and safety of life, when activated to signal an alarm, may operate during the pendency of the alarm condition.

(b) In addition to the provisions of §15.205, the field strength of emission from intentional radiators operated under this section shall not exceed the following:

Fundamental frequency (MHz)	Field strength of fundamental (microvolts/meter)	Field strength of spurious emissions (microvolts/meter)
40.66 - 40.70	2,250	225
70 - 130	1,250	125
130 - 174	1,250 to 3,750 **	125 to 375 **
174 - 260	3,750	375
260 - 470	3,750 to 12,500 **	375 to 1,250 **
Above 470	12,500	1,250

** Linear interpolations

[Where F is the frequency in MHZ, the formula for calculating the maximum permitted field strengths are as follows: for the band 130 - 174 MHz, $\mu\text{V/m}$ at 3 meters = $56.81818(F) - 6136.3636$; for the band 260 - 470 MHz, $\mu\text{V/m}$ at 3 meters = $41.6667(F) - 7083.3333$. The maximum permitted unwanted emission level is 20 dB below the maximum permitted fundamental level.]

(1) The above field strength limits are specified at a distance of 3 meters. The tighter limits apply at the band edges.

(2) Intentional radiators operating under the provisions of this section shall demonstrate compliance with the limits on the field strength of emissions, as shown in the above table, based on the average value of the measured emissions. As an alternative, compliance with the limits in the above table may be based on the use of measurement instrumentation with a CISPR quasi-peak detector. The specific method of measurement employed shall be specified in the application for equipment authorization. If average emission measurements are employed, the provision in §15.35 for averaging pulsed emission and for limiting peak emissions apply. Further, compliance with the provisions of §15.205 shall be demonstrated using the measurement instrumentation specified in that section.

(3) The limits on the field strength of the spurious emission in the above table are based on the fundamental frequency of the intentional radiator. Spurious emission shall be attenuated to the average (or, alternatively, CISPR quasi-peak) limits shown in this table or to the general limits shown in §15.209, whichever limit permits a higher field strength.

(c) The bandwidth of the emission shall be no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz. For devices operating above 900 MHz, the emission shall be no wider than 0.5% of the center frequency. Bandwidth is determined at the points 20 dB down from the modulated carrier.

(d) For devices operation within the frequency band 40.66-40.70 MHz, the bandwidth of the emission shall be confined within the band edges and the frequency tolerance of the carrier shall be $\pm 0.01\%$. This frequency tolerance shall be maintained for a temperature variation of -20 degrees to +50 degrees C at normal supply voltage, and for a variation on the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery.

(e) Intentional radiators may operate at a periodic rate exceeding that specified in paragraph (a) of this section and may be employed for any type of operation, including operation prohibited in paragraph (a) of this section, provided that intentional radiator complies with the provisions of paragraphs (b) through (d) of this section except the field strength table in paragraph (b) of this section is replaced by the following:

Fundamental frequency (MHz)	Field strength of fundamental (microvolts/meter)	Field strength of spurious emissions (microvolts/meter)
40.66 - 40.70	1,000	100
70 - 130	500	50
130 - 174	500 to 1,500 **	50 to 150 **
174 - 260	1,500	150
260 - 470	1,500 to 5,000 **	150 to 500 **
Above 470	5,000	500

** Linear interpolations

[Where F is the frequency in MHZ, the formula for calculating the maximum permitted field strengths are as follows: for the band 130 – 174 MHz, $\mu\text{V/m}$ at 3 meters = $22.72727(F) - 2454.545$; for the band 260 – 470 MHz, $\mu\text{V/m}$ at 3 meters = $16.6667(F) - 2833.3333$. The maximum permitted unwanted emission level is 20 dB below the maximum permitted fundamental level.]

In addition, devices operated under the provisions of this paragraph shall be provided with a means for automatically limiting operation so that the duration of each transmission shall not be greater than one second and the silent periods between transmissions shall be at least 30 times the duration of the transmission but in no case less than 10 seconds.

3.2.3 Test Procedure

The testing was performed according to the procedures in ANSI C63.4: 2003 and 47 CFR Part 15. Testing was performed at the Nemko-CCL, Inc. Wanship open area test site #2, located at 29145 Old Lincoln Highway, Wanship, UT. This site has been fully described in a report submitted to the FCC, and was accepted in a letter dated March 11, 2009 (90504).

Nemko-CCL, Inc. is accredited by National Voluntary Laboratory Accreditation Program (NVLAP); NVLAP Lab Code: 100272-0, which is effective until September 30, 2011.

SECTION 4.0 OPERATION OF EUT DURING TESTING

4.1 Operating Environment:

Power Supply: 12 Vdc from A23S battery

4.2 Operating Modes:

The EUT was tested on 3 orthogonal axes while on the EUT table with the button held down so the EUT would constantly transmit. A new battery was used for testing.

4.3 EUT Exercise Software:

No software was required.

SECTION 5.0 SUMMARY OF TEST RESULTS**5.1 FCC Part 15, Subpart C****5.1.1 Summary of Tests:**

Part 15, Subpart C Reference	Test Performed	Frequency Range (MHz)	Result
15.203	Antenna Requirement	N/A	Complied
15.231 (a)	Periodic Operation	315	Complied
15.231 (b)	Radiated Emissions	30 to 3150	Complied
15.231 (c)	Bandwidth	315	Complied
15.231 (d)	Frequency Stability	40.66 to 40.70	Not Applicable
15.231 (e)	Radiated Emissions	30 to 3150	Not Applicable

5.2 Result

In the configuration tested, the EUT complied with the requirements of the specification.

SECTION 6.0 MEASUREMENTS, EXAMINATIONS AND DERIVED RESULTS

6.1 General Comments:

This section contains the test results only. Details of the test methods used and a list of the test equipment used during the measurements can be found in Appendix 1 of this report.

6.2 Test Results:

6.2.1 §15.203

Demonstration of Compliance:

The antenna is an etched portion of the PCB and cannot be replaced by the user.

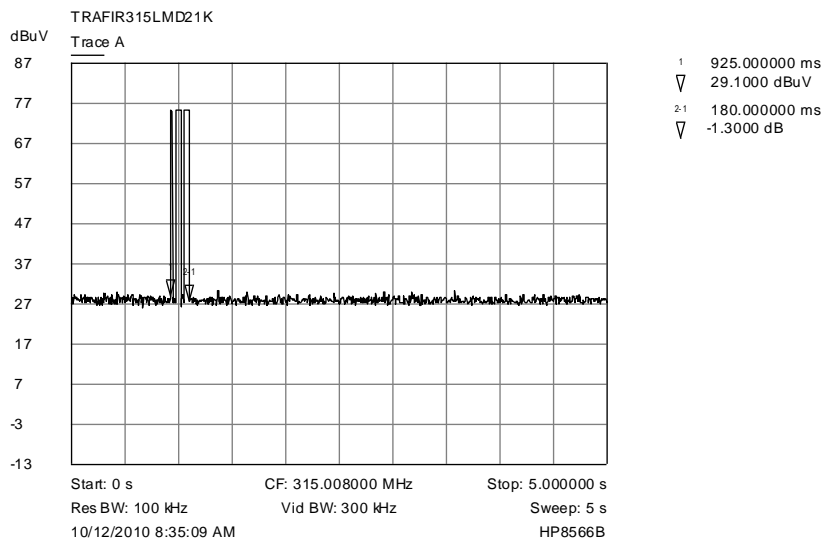
RESULT

The EUT complied with the requirements of this section.

6.2.2 §15.231 (a)

Demonstration of Compliance:

1. A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released. The plot below shows the transmitter button depressed to activate the transmitter and then immediately released.



TRAFIR315LMD21K
Trace A button pressed to transmit and then released

2. The TRAFIR315LMD21K cannot be automatically activated. The TRAFIR315LMD21K only transmits if manually activated.
3. The TRAFIR315LMD21K does not transmit at regular predetermined intervals. The TRAFIR315LMD21K only transmits if manually activated.

RESULT

In the configuration tested, the EUT complied with the requirements of this section.

6.2.3 §15.231 (b) Radiated Emissions

Demonstration of Compliance:

The TRAFIR315LMD21K operates at 315.0 MHz, therefore; the field strength of the fundamental must be less than 6041.6772 $\mu\text{V/m}$ (75.6 $\text{dB}\mu\text{V/m}$) at 3 meters. The maximum permitted field strength of any unwanted emission must be 20 dB below the maximum allowable fundamental field strength (55.6 $\text{dB}\mu\text{V/m}$). Emissions in the restricted bands of §15.205 must meet the limits specified in §15.209.

Calculations – Limit = $20 \log ((41.6667 \times \text{Fundamental in MHz}) - 7083.3333)$

$$\text{Limit} = 20 \log ((41.6667 \times 315) - 7083.3333) = 75.6 \text{ dB}\mu\text{V/m}$$

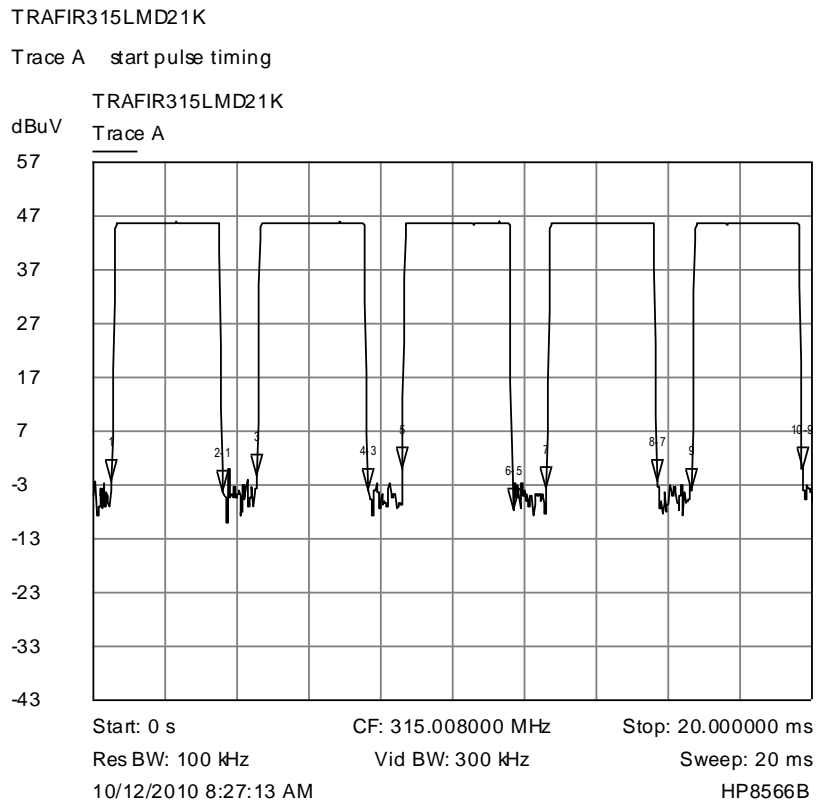
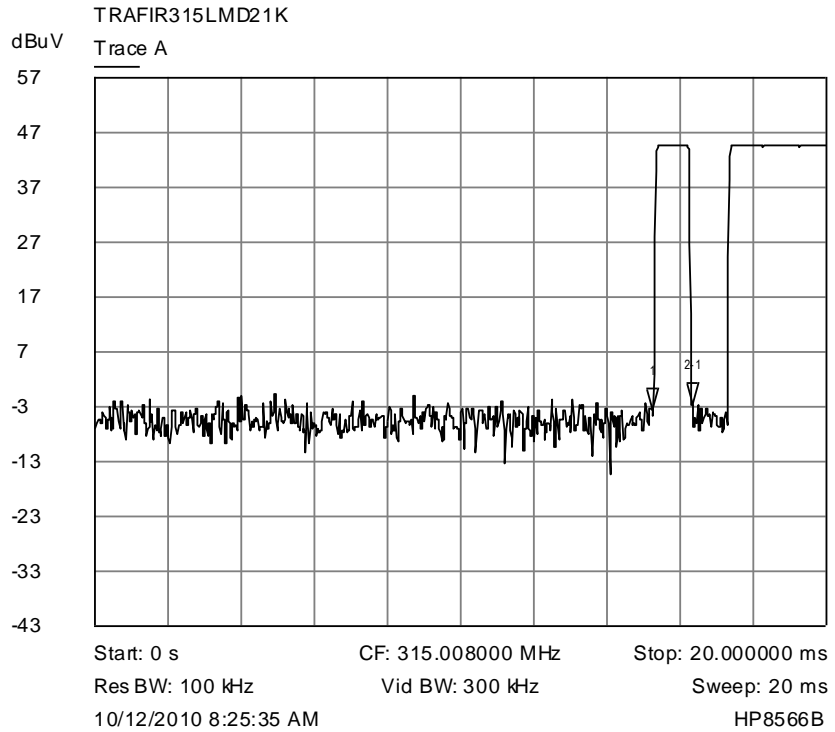
Measurement Data Fundamental and Harmonic Emissions:

The frequency range from 30 MHz to the tenth harmonic of the highest fundamental frequency was investigated to measure any radiated emissions.

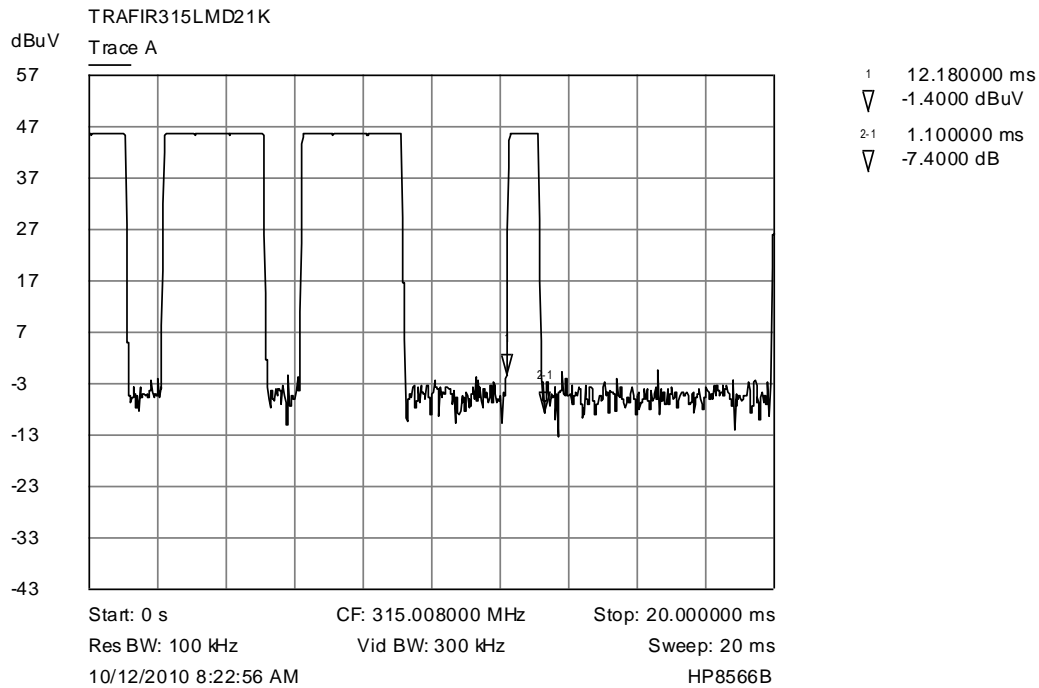
A diagram of the test configuration and test equipment used is enclosed in Appendix 1.

Pulsed Emission Averaging Factor

The TRAFIR315LMD21K transmitter is a pulsed emission device; therefore, the method of §15.35 for averaging a pulsed emission may be used. The plots of the pulse train and the average factor calculations are shown below:



TRAFIR315LMD21K
 Trace A pulse timing



TRAFIR315LMD21K
 Trace A stop pulse timing

Average factor calculation

From the plots above, the pulse train is 84.3 ms in duration and consists of 11 pulses, 9 of which are 3.08 ms in duration and 2 are 1.10 ms in duration. The pulse train total on time is 29.92 ms.

The Average Factor is calculated by the equation:

$$\begin{aligned}
 \text{Average Factor} &= 20 \log (\text{on time/pulse train time}) \\
 &= 20 \log ((9 \times 3.08 \text{ ms}) + (2 \times 1.10 \text{ ms})/84.3 \text{ ms}) \\
 &= 20 \log (29.92 \text{ ms}/84.3 \text{ ms}) \\
 &= -9.0 \text{ dB}
 \end{aligned}$$

§15.35(b) specifies a 20 dB maximum between the peak and average measurements; therefore, a -9.0 dB averaging factor is allowed by the FCC specification.

The data in the tables shown below are the worst-case emissions seen at the listed frequency and antenna polarity using the test configurations shown in Appendix 2 Photos 1 through 3.

Radiated Interference Measurements – (Vertical Polarity)

Frequency (MHz)	Detector	Receiver Reading (dB μ V)	Average Factor (dB)	Correction Factor (dB/m)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Delta (dB)
315.0	Peak	32.5	-9.0	16.0	39.5	75.6	-36.1
630.0	Peak	24.0	-9.0	23.7	38.7	55.6	-16.9
945.0	Peak	11.9	-9.0	28.4	31.3	55.6	-24.3
1260.0	Peak	5.0	-9.0	26.6	22.6	55.6	-33.0
1575.0*	Peak	2.0	-9.0	28.0	21.0	54.0	-33.0
1890.0	Peak	0.8	-9.0	29.7	21.5	55.6	-34.1
2205.0*	Peak	0.4	-9.0	30.9	22.3	54.0	-31.7
2520.0	Peak	0.0	-9.0	31.7	22.7	55.6	-32.9
2835.0*	Peak	-0.6	-9.0	33.0	23.4	54.0	-30.6
3150.0	Peak	-0.3	-9.0	34.0	24.7	55.6	-30.9

* Emissions within restricted bands

Radiated Interference Measurements - (Horizontal Polarity)

Frequency (MHz)	Detector	Receiver Reading (dB μ V)	Average Factor (dB)	Correction Factor (dB/m)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Delta (dB)
315.0	Peak	38.8	-9.0	16.0	45.8	75.6	-29.8
630.0	Peak	26.4	-9.0	23.7	41.1	55.6	-14.5
945.0	Peak	14.1	-9.0	28.4	33.5	55.6	-22.1
1260.0	Peak	2.7	-9.0	26.6	20.3	55.6	-35.3
1575.0*	Peak	5.2	-9.0	28.0	24.2	54.0	-29.8
1890.0	Peak	0.8	-9.0	29.7	21.5	55.6	-34.1
2205.0*	Peak	0.8	-9.0	30.9	22.7	54.0	-31.3
2520.0	Peak	-0.1	-9.0	31.7	22.6	55.6	-33.0
2835.0*	Peak	-0.4	-9.0	33.0	23.6	54.0	-30.4
3150.0	Peak	-0.1	-9.0	34.0	24.9	55.6	-30.7

* Emissions within restricted bands

Sample Field Strength Calculation:

The field strength is calculated by adding the Correction Factor (Antenna Factor + Cable Factor) and the Average Factor to the measured level of the receiver. The receiver amplitude reading is compensated for any amplifier gain.

The basic equation with a sample calculation is shown below:

$$FS = RA + CF + AV \text{ Where}$$

FS = Field Strength

RA = Receiver Amplitude Reading

CF = Correction Factor (Antenna Factor + Cable Factor)

AV = Averaging Factor

Assume a receiver reading of 44.2 dB μ V is obtained from the receiver, with an average factor of -8.6 dB and a correction factor of 17.5 dB. The field strength is calculated by adding the correction factor and the average factor, giving a field strength of 53.1 dB μ V/m, $FS = 44.2 + 17.5 + (-8.6) = 53.1 \text{ dB}\mu\text{V/m}$

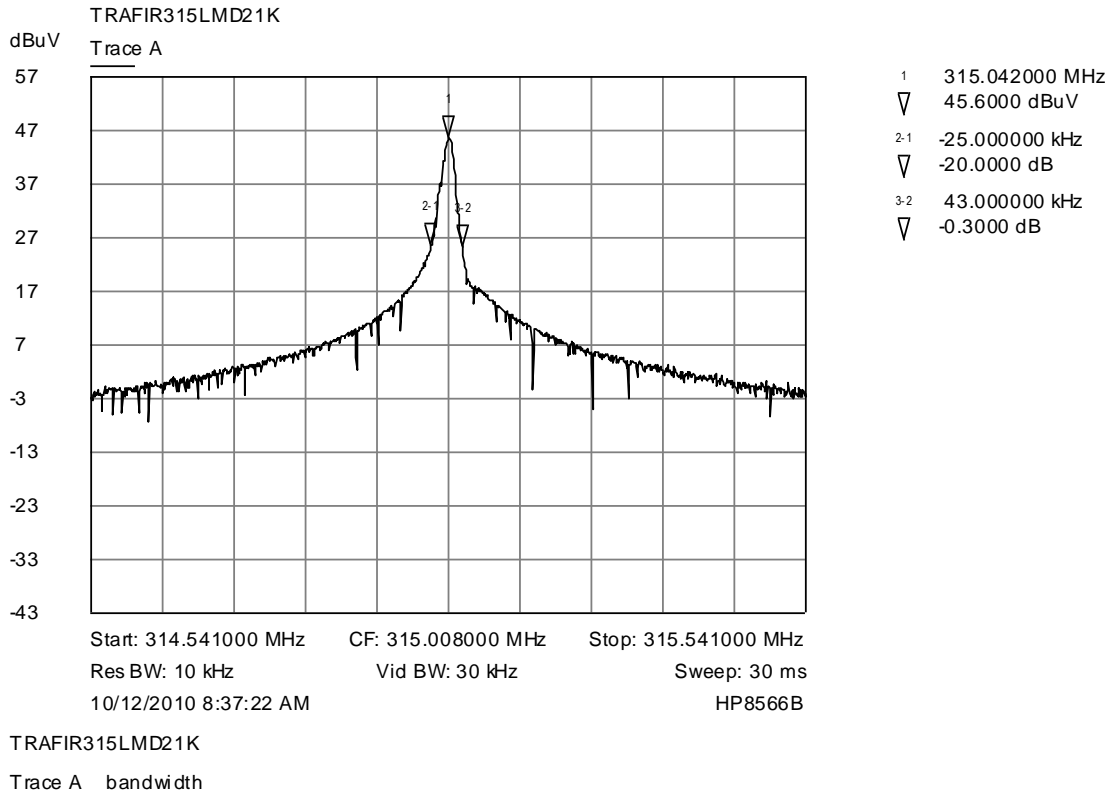
RESULT

In the configuration tested, the EUT complied with the requirements of this section.

6.2.4 §15.231 (c) Bandwidth**Demonstration of Compliance:**

The bandwidth of the emission must not be wider than 0.25% of the center frequency. The center frequency is 315 MHz, therefore the bandwidth must not be wider than 787.5 kHz. The TRAFIR315LMD21K bandwidth was 43 kHz. See spectrum analyzer plot below.

TRAFIR315LMD21K Bandwidth Plot



RESULT

In the configuration tested, the EUT complied with the requirements of this section.

APPENDIX 1 TEST PROCEDURES AND TEST EQUIPMENT

A1.1 Radiated Disturbance:

The radiated disturbance from the EUT was measured using a spectrum analyzer with a quasi-peak adapter for peak and quasi-peak readings. A preamplifier with a fixed gain of 26 dB was used to increase the sensitivity of the measuring instrumentation. The quasi-peak adapter uses a bandwidth of 120 kHz, with the spectrum analyzer's resolution bandwidth set at 1 MHz, for readings in the 30 to 1000 MHz frequency ranges. A 28 dB preamp was used for measurements above 1000 MHz with the spectrum analyzer RBW set to 1 MHz and VBW at 3 MHz..

A biconilog antenna was used to measure the frequency range of 30 to 1000 MHz, at a distance of 3 meters from the EUT. The readings obtained by these antennas are correlated to the levels obtained with a tuned dipole antenna by adding antenna factors. A double-ridged guide antenna was used to measure the emissions at frequencies above 1000 MHz at a distance of 3 meters from the EUT.

The configuration of the EUT was varied to find the maximum radiated emission. The EUT was connected to the peripherals listed in Section 2.3 via the interconnecting cables listed in Section 2.4. A technician manually manipulated these interconnecting cables to obtain worst-case radiated disturbance. The EUT was rotated 360 degrees, and the antenna height was varied from 1 to 4 meters to find the maximum radiated emission. Where there were multiple interface ports all of the same type, cables are either placed on all of the ports or cables added to these ports until the emissions do not increase by more than 2 dB.

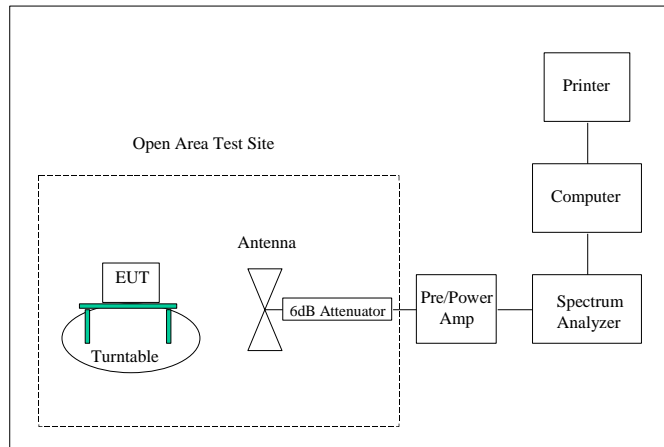
Desktop EUT are measured on a non-conducting table 0.8 meters above the ground plane. The table is placed on a turntable, which is level with the ground plane. For equipment normally placed on floors, the equipment shall be placed directly on the turntable.

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
Wanship Open Area Test Site #2	Nemko-CCL, Inc.	N/A	N/A	10/08/2009
Test Software	Nemko-CCL, Inc.	Radiated Emissions	Revision 1.3	N/A
Spectrum Analyzer/Receiver	Rohde & Schwarz	1302.6005.40	100064	07/30/2010
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711	11/06/2009
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137	11/06/2009
Biconilog Antenna	EMCO	3142	9601-1009	08/21/2009

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
Double Ridged Guide Antenna	EMCO	3115	9409-4355	03/11/2009
High Frequency Amplifier	Miteq	AFS4-01001800-43-10P-4	1096455	06/04/2009
20' High Frequency Cable	Utiflex	UFA210A-1-2400-30050U	1175	03/04/2010
3 Meter Radiated Emissions Cable Wanship Site #2	Nemko-CCL, Inc.	Cable K	N/A	12/31/2009
Pre/Power-Amplifier	Hewlett Packard	8447F	3113A05161	08/25/2010
6 dB Attenuator	Hewlett Packard	8491A	32835	12/31/2009

An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Radiated Emissions Test Setup



APPENDIX 2 PHOTOGRAPHS

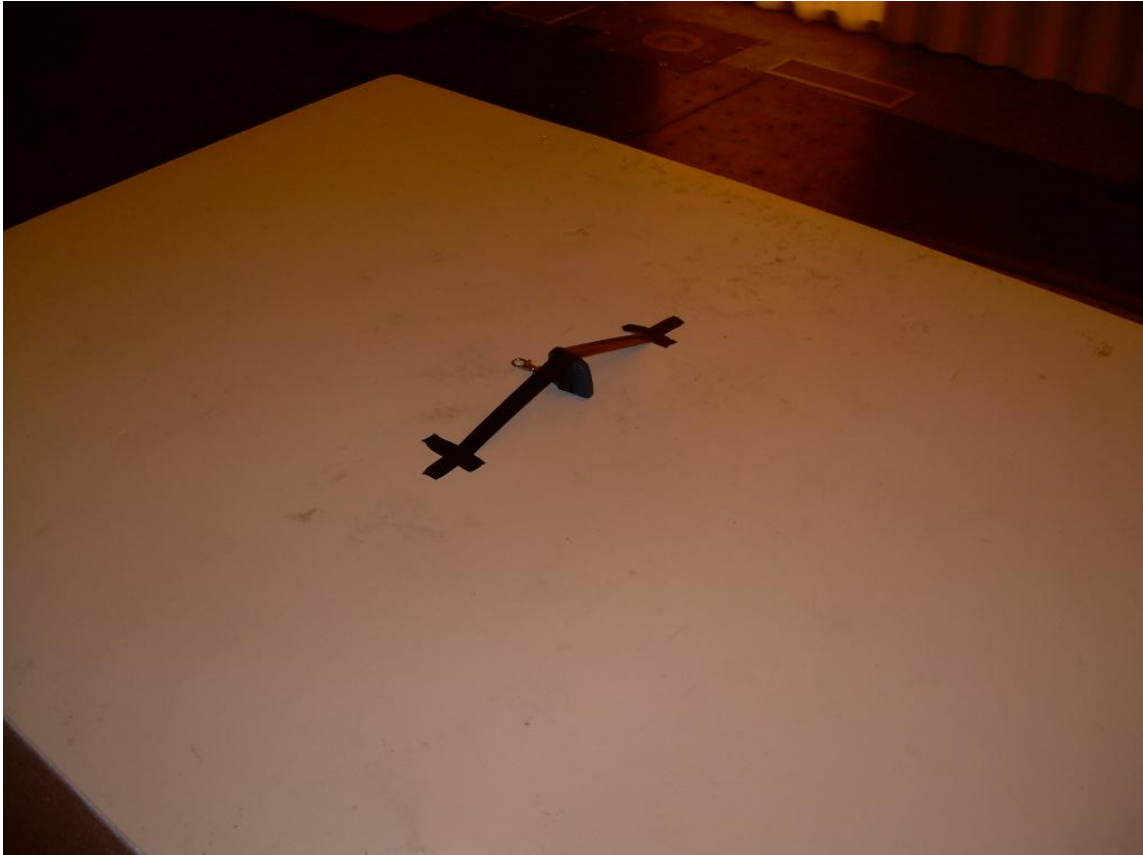
Photograph 1 – Test Configuration – Vertical Placement of EUT



Photograph 2 – Test Configuration – Horizontal Placement of EUT



Photograph 3 – Test Configuration – On-Edge Placement of EUT



Photograph 4 – Front View of EUT



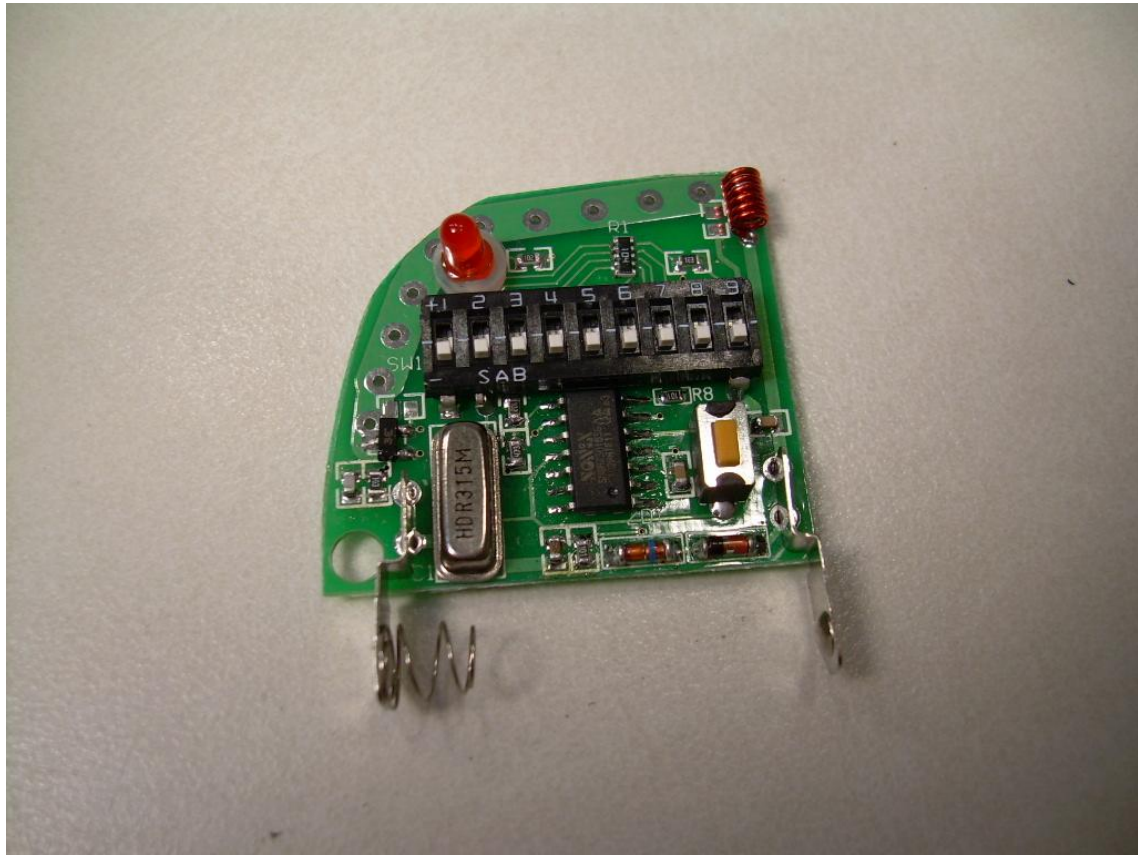
Photograph 5 – Back View of the EUT



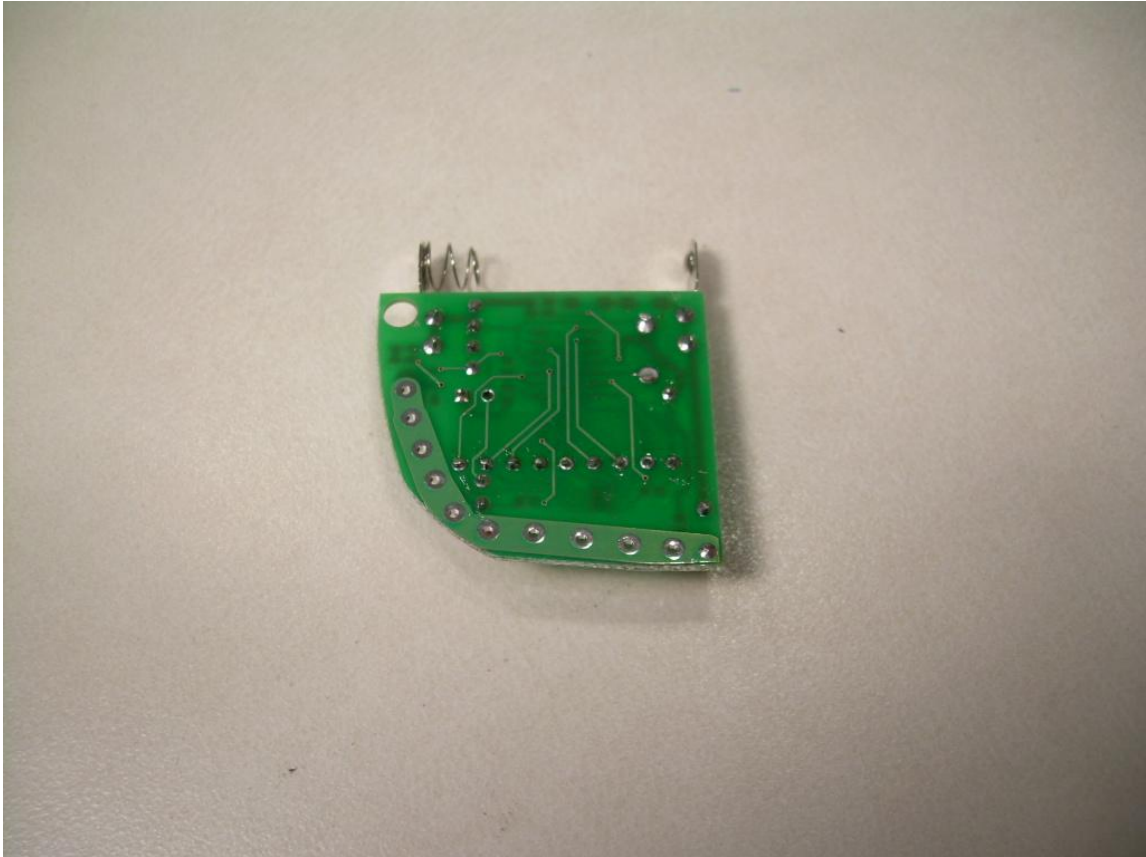
Photograph 6 – View of the EUT With Plastic Housing Opened



Photograph 7 – Component Side of PCB



Photograph 8 – Trace Side of PCB



APPENDIX 3 MANUFACTURER’S STATEMENT/ATTESTATION

The manufacturer or responsible party for the equipment tested hereby affirms:

- a) That he/she has reviewed and concurs that the tests shown in this report are reflective of the operational characteristics of the device for which certification is sought;
- b) That the device in this test report will be representative of production units;
- c) That the product will have all of the documented modifications incorporated into the product when manufactured and placed on the market;
- d) That all changes in hardware and software/firmware to the subject device will be reviewed.
- e) That any changes impacting the attributes, functionality or operational characteristics documented in this report will be communicated to the body responsible for approving or certifying the subject equipment.

Printed name of official	Signature of official	Date
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NOTE—This affirmation must be signed by the responsible party before it is submitted to a regulatory body for approval.