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Issued date : August 22, 2017

FCC ID : T8VCL6

## **RADIO TEST REPORT**

**Test Report No.: 11766072H-A-R1** 

Applicant : ASAHI DENSO CO., LTD.

Type of Equipment : Steering Lock

Model No. : CL6

FCC ID : T8VCL6

Test regulation : FCC Part 15 Subpart C: 2017

Test Result : Complied

- 1. This test report shall not be reproduced in full or partial, without the written approval of UL Japan, Inc.
- 2. The results in this report apply only to the sample tested.
- 3. This sample tested is in compliance with above regulation.
- 4. The test results in this report are traceable to the national or international standards.
- 5. This test report must not be used by the customer to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- 6. This test report covers Radio technical requirements. It does not cover administrative issues such as Manual or non-Radio test related Requirements. (if applicable)
- 7. This report is a revised version of 11766072H-A.

**Date of test:** June 27, 2017

Representative test engineer:

Yuta Moriya
Engineer

Consumer Technology Division

Approved by:

Motoya Imura Engineer

Consumer Technology Division



This laboratory is accredited by the NVLAP LAB CODE 200572-0, U.S.A. The tests reported herein have been performed in accordance with its terms of accreditation. \*As for the range of Accreditation in NVLAP, you may refer to the WEB address,

http://japan.ul.com/resources/emc\_accredited/

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## **REVISION HISTORY**

Original Test Report No.: 11766072H-A

Revision	Test report No.	Date	Page revised	Contents
- (Original)	11766072H-A	July 25, 2017	-	-
1	11766072H-A-R1	August 22, 2017	P.9	Addition of the following sentence; "Also, it was confirmed that there were no differences in the noise levels and bandwidth of EUT regardless of with or without transponder."
1	11766072H-A-R1	August 22, 2017	P.11	typo of RBW value in SECTION 6

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## **CONTENTS PAGE** SECTION 4: Operation of E.U.T. during testing......8 SECTION 5: Radiated emission (Fundamental and Spurious Emission)......9 Radiated Emission below 30 MHz (Fundamental and Spurious Emission) .......12 Radiated Emission above 30 MHz (Spurious Emission)......13 -26 dB Bandwidth and 99 % Occupied Bandwidth ......14

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### **SECTION 1: Customer information**

Company Name : ASAHI DENSO CO., LTD.

Address : 6-2-1 Somejidai, Hamakita-ku, Hamamatsu, Shizuoka 434-0046, Japan

Telephone Number : +81-53-586-7383 Facsimile Number : +81-53-584-1589 Contact Person : Tomohiro Yaguchi

### **SECTION 2:** Equipment under test (E.U.T.)

#### 2.1 Identification of E.U.T.

Type of Equipment : Steering Lock

Model No. : CL6

Serial No. : Refer to Clause 4.2

Rating : DC 12.0 V Receipt Date of Sample : May 23, 2017

Country of Mass-production : Japan

Condition of EUT : Production prototype

(Not for Sale: This sample is equivalent to mass-produced items.)

Modification of EUT : No Modification by the test lab

#### 2.2 Product Description

Model: CL6 (referred to as the EUT in this report) is a Steering Lock.

**General Specification** 

Clock frequency(ies) in the system : 4 MHz (LF transmitter part), 20 MHz (microcomputer operating),

21.948717 MHz (RF receiving circuit part)

**Radio Specification** 

[Transmitter part]

Radio Type : Transceiver
Frequency of Operation : 134.2 kHz
Modulation : ASK

Power Supply (inner) : DC 8 V (LF transmitter part), DC 5 V (other parts)

Antenna type : Coil Antenna

Operating Temperature : -20 deg. C to +80 deg. C

[Receiver part]\*

Radio Type : Receiver
Frequency of Operation : 433.92 MHz

\*1) The test of receiver part was performed separately from this test report, and the conformability is confirmed.

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## **SECTION 3:** Test specification, procedures & results

#### 3.1 Test Specification

Test Specification : FCC Part 15 Subpart C

FCC Part 15 final revised on June 14, 2017 and effective July 14, 2017

Title : FCC 47CFR Part15 Radio Frequency Device Subpart C Intentional Radiators

Section 15.207 Conducted Emission

Section 15.209 Radiated emission limits, general requirements

#### 3.2 Procedures and results

No.	Item	Test Procedure	Specification	Remarks	Deviation	Worst margin	Results
1	Conducted Emission	<fcc> ANSI C63.10:2013 6 Standard test methods <ic> RSS-Gen 8.8</ic></fcc>	<fcc> Section 15.207 <ic> RSS-Gen 8.8</ic></fcc>	-	N/A *1)	N/A	N/A
2	Electric Field Strength of Fundamental Emission	<fcc> ANSI C63.10:2013 6 Standard test methods <ic> RSS-Gen 6.4, 6.12</ic></fcc>	<fcc> Section 15.209 <ic> RSS-210 4.4 RSS-Gen 8.9</ic></fcc>	Radiated	N/A	10.7 dB 0.139 MHz 0 deg. PK with Duty Factor	Complied
3	Electric Field Strength of Spurious Emission	<fcc> ANSI C63.10:2013 6 Standard test methods <ic> RSS-Gen 6.4, 6.13</ic></fcc>	<fcc> Section 15.209 <ic> RSS-210 4.4 RSS-Gen 8.9</ic></fcc>	Radiated	N/A	0.8 dB 114.030 MHz Vertical, QP	Complied
4	-26dB Bandwidth	<fcc> ANSI C63.10:2013 6 Standard test methods <ic></ic></fcc>	<fcc> Reference data <ic></ic></fcc>	Radiated	N/A	N/A	N/A

Note: UL Japan, Inc.'s EMI Work Procedures No. 13-EM-W0420 and 13-EM-W0422.

### FCC Part 15.31 (e)

The EUT provides stable voltage (DC 8 V) constantly to the wireless transmitter regardless of input voltage. Instead of a new battery, DC power supply was used for the test.

That does not affect the test result, therefore the EUT complies with the requirement.

#### FCC Part 15.203 Antenna requirement

It is impossible for end users to replace the antenna, because the antenna is mounted inside of the EUT. Therefore, the equipment complies with the antenna requirement of Section 15.203.

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<sup>\*</sup> The revision on June 14, 2017, does not affect the test specification applied to the EUT.

<sup>\*</sup> Also the EUT complies with FCC Part 15 Subpart B.

<sup>\*1)</sup> The test is not applicable since the EUT is not the device that is designed to be connected to the public utility (AC) power line.

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#### 3.3 Addition to standard

No.	Item	Test Procedure	Specification	Remarks	Deviation	Worst margin	Results
1	99 % Occupied	RSS-Gen 6.6	-	Radiated	N/A	N/A	N/A
	Band Width						

Other than above, no addition, exclusion nor deviation has been made from the standard.

### 3.4 Uncertainty

#### **EMI**

The following uncertainties have been calculated to provide a confidence level of 95% using a coverage factor k=2.

Test distance	Radiated emission (+/-)
	9 kHz - 30 MHz
3 m	3.8 dB
10 m	3.7 dB

<sup>\*</sup>Measurement distance

	Radiated emission (Below 1 GHz)					
Polarity	(3 m	*)(+/-)	(10 m*)(+/-)			
Polarity	30 MHz -	200 MHz -	30 MHz - 200 MHz	200 MHz -		
	200 MHz	1000 MHz	30 MHZ - 200 MHZ	1000 MHz		
Horizontal	5.0 dB	5.3 dB	5.0 dB	5.0 dB		
Vertical	4.7 dB	5.9 dB	5.0 dB	5.1 dB		

#### Radiated emission test(3 m)

[Electric Field Strength of Fundamental Emission]

The data listed in this test report has enough margin, more than the site margin.

[Electric Field Strength of Spurious Emission]

The data listed in this report meets the limits unless the uncertainty is taken into consideration.

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### 3.5 Test Location

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Telephone: +81 596 24 8999 Facsimile: +81 596 24 8124

·	IC Registration	Width x Depth x	Size of	Other
	Number	Height (m)	reference ground plane (m) / horizontal conducting plane	rooms
No.1 semi-anechoic chamber	2973C-1	19.2 x 11.2 x 7.7m	7.0 x 6.0m	No.1 Power source room
No.2 semi-anechoic chamber	2973C-2	7.5 x 5.8 x 5.2m	4.0 x 4.0m	-
No.3 semi-anechoic chamber	2973C-3	12.0 x 8.5 x 5.9m	6.8 x 5.75m	No.3 Preparation room
No.3 shielded room	-	4.0 x 6.0 x 2.7m	N/A	-
No.4 semi-anechoic chamber	2973C-4	12.0 x 8.5 x 5.9m	6.8 x 5.75m	No.4 Preparation room
No.4 shielded room	-	4.0 x 6.0 x 2.7m	N/A	-
No.5 semi-anechoic chamber	-	6.0 x 6.0 x 3.9m	6.0 x 6.0m	-
No.6 shielded room	-	4.0 x 4.5 x 2.7m	4.0 x 4.5 m	-
No.6 measurement room	-	4.75 x 5.4 x 3.0m	4.75 x 4.15 m	-
No.7 shielded room	-	4.7 x 7.5 x 2.7m	4.7 x 7.5m	-
No.8 measurement room	-	3.1 x 5.0 x 2.7m	N/A	-
No.9 measurement room	-	8.0 x 4.6 x 2.8m	2.4 x 2.4m	-
No.11 measurement room	-	6.2 x 4.7 x 3.0m	4.8 x 4.6m	-

<sup>\*</sup> Size of vertical conducting plane (for Conducted Emission test): 2.0 x 2.0m for No.1, No.2, No.3, and No.4 semi-anechoic chambers and No.3 and No.4 shielded rooms.

### 3.6 Test data, Test instruments, and Test set up

Refer to APPENDIX.

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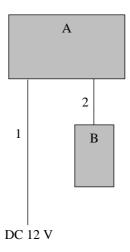
## **SECTION 4: Operation of E.U.T. during testing**

### 4.1 Operating Modes

Test mode	Remarks
Transmitting mode	134.2 kHz

Justification : The system was configured in typical fashion (as a user would normally use it) for testing.

### 4.2 Configuration and peripherals



<sup>\*</sup> Cabling and setup were taken into consideration and test data was taken under worse case conditions.

**Description of EUT and Support equipment** 

No. Item		Model number   Serial number		Manufacturer	Remark	
A	Steering Lock	CL6	No.1	ASAHI DENSO CO., LTD.	EUT	
В	LF Antenna	CZ162	7510	ASAHI DENSO CO., LTD.	EUT	

List of cables used

No.	Name	Length (m)	Shield		Remark
			Cable	Connector	
1	DC Cable	2.0	Unshielded	Unshielded	-
2	Signal Cable	0.6	Unshielded	Unshielded	-

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## **SECTION 5: Radiated emission (Fundamental and Spurious Emission)**

#### **Test Procedure**

EUT was placed on a urethane platform of nominal size, 0.5 m by 1.0 m, raised 0.8 m above the conducting ground plane.

The Radiated Electric Field Strength has been measured in a Semi Anechoic Chamber with a ground plane.

Frequency: From 9 kHz to 30 MHz

The EUT was rotated a full revolution in order to obtain the maximum value of the electric field intensity.

The measurements were performed for vertical polarization (antenna angle: 0 deg., 45 deg., 90 deg., and 135 deg.) and horizontal polarization.

\*Refer to Figure 1 about Direction of the Loop Antenna.

Frequency: From 30 MHz to 1 GHz

The measuring antenna height varied between 1 and 4 m and EUT was rotated a full revolution in order to obtain the maximum value of the electric field intensity.

The measurements were performed for both vertical and horizontal antenna polarization.

The test was made with the detector (RBW / VBW) in the following table.

When using Spectrum analyzer, the test was made with adjusting span to zero by using peak hold.

#### Test Antennas are used as below;

Frequency	Below 30 MHz	30 MHz to 200 MHz	200 MHz to 1 GHz
Antenna Type	Loop	Biconical	Logperiodic

Frequency	From 9 kHz to 90 kHz and From 110 kHz to 150 kHz	From 90 kHz to 110 kHz	From 150 kHz to 490 kHz	From 490 kHz to 30 MHz	From 30 MHz to 1 GHz	
Instrument used		Test Receiver				
Detector	PK / AV	QP	PK / AV	QP	QP	
IF Bandwidth	200 Hz	200 Hz	9 kHz	9 kHz	120 kHz	
Test Distance	3 m *1)	3 m *1)	3 m *1)	3 m *2)	3 m	

<sup>\*1)</sup> Distance Factor:  $40 \times \log (3 \text{ m} / 300 \text{ m}) = -80 \text{ dB}$ 

Although these tests were performed other than open field test site, adequate comparison measurements were confirmed against 30 m open field test site. Therefore sufficient tests were made to demonstrate that the alternative site produces results that correlate with the ones of tests made in an open field based on KDB 414788.

These tests were performed in semi anechoic chamber. Therefore the measured level of emissions may be higher than if measurements were made without a ground plane.

However test results were confirmed to pass against standard limit.

- The carrier level and noise levels were confirmed at each position of X, Y and Z axes of EUT to see the position of maximum noise, and the test was made at the position that has the maximum noise.

Also, it was confirmed that there were no differences in the noise levels and bandwidth of EUT regardless of with or without transponder.

The test results and limit are rounded off to one decimal place, so some differences might be observed.

Measurement range : 9 kHz - 1 GHz Test data : APPENDIX 1

Test result : Pass

Date: June 27, 2017 Test engineer: Yuta Moriya

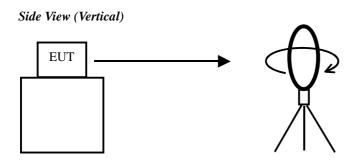
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<sup>\*2)</sup> Distance Factor:  $40 \times \log (3 \text{ m} / 30 \text{ m}) = -40 \text{ dB}$ 

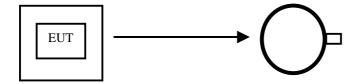
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Figure 1: Direction of the Loop Antenna



.....

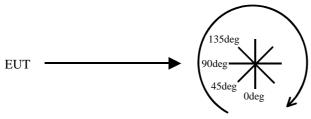
Top View (Horizontal)



Antenna was not rotated.

.....

#### Top View (Vertical)



Front side: 0 deg.

Forward direction: clockwise

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## SECTION 6: -26dB Bandwidth

#### **Test Procedure**

The test was measured with a spectrum analyzer using a test fixture.

Test	Span	RBW	VBW	Sweep	Detector	Trace	Instrument used
-26 dB Bandwidth	50 kHz	510 Hz	1.5 kHz	Auto	Peak	Max Hold	Spectrum Analyzer

Test data : APPENDIX 1

Test result : Pass

## **SECTION 7: 99% Occupied Bandwidth**

#### **Test Procedure**

The test was measured with a spectrum analyzer using a test fixture.

Test	Span	RBW	VBW	Sweep	Detector	Trace	Instrument used		
99 % Occupied	Enough width to display	1 to 5 %	Three times	Auto	Peak *1)	Max Hold	Spectrum Analyzer		
Bandwidth	emission skirts	of OBW	of RBW			*1)			
*1) The measurement was performed with Peak detector, Max Hold since the duty cycle was not 100 %.									
Peak hold was applied as Worst-case measurement									

Test data : APPENDIX 1

Test result : Pass

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## **APPENDIX 1: Test data**

## Radiated Emission below 30 MHz (Fundamental and Spurious Emission)

Test place Ise EMC Lab. No.2 Semi Anechoic Chamber

Order No. 11766072H Date June/27/2017 Temperature/ Humidity 23 deg. C / 42 % RH

Engineer Yuta Moriya Mode Tx 134.2 kHz

#### PK or OP

Ant Deg [deg]	Frequency	Detector	Reading	Ant	Loss	Gain	Duty	Result	Limit	Margin	Remark
or				Factor			Factor				
Polarity [Hori/Vert	[MHz]		[dBuV]	[dB/m]	[dB]	[dB]	[dB]	[dBuV/m]	[dBuV/m]	[dB]	
0	0.13900	PK	100.4	19.7	-73.9	32.2	-	14.0	44.7	30.7	Fundamental
0	0.15116	PK	80.1	19.6	-73.9	32.2	-	-6.4	44.0	50.4	
0	0.27800	PK	61.6	19.6	-73.9	32.2	-	-24.9	38.7	63.6	
0	0.41700	PK	55.1	19.6	-73.9	32.1	-	-31.3	35.2	66.5	
0	0.55600	QP	36.8	19.5	-33.8	32.1	-	-9.6	32.7	42.3	
0	0.69500	QP	41.0	19.5	-33.8	32.2	-	-5.5	30.7	36.2	
0	0.83400	QP	32.2	19.5	-33.8	32.2	-	-14.3	29.2	43.5	
0	0.97300	QP	33.3	19.5	-33.8	32.2	-	-13.2	27.8	41.0	
0	1.11200	QP	31.1	19.5	-33.8	32.2	-	-15.4	26.6	42.0	
0	1.25100	QP	30.9	19.5	-33.7	32.2	-	-15.5	25.6	41.1	
0	1.39000	QP	30.8	19.5	-33.7	32.2	-	-15.6	24.7	40.3	

 $Result = Reading + Ant\ Factor + Loss\ (Cable + Attenuator + Filter + D.Factor) - Gain(Amprifier)$ 

#### PK with Duty factor

Ant Deg [deg]	Frequency	Detector	Reading	Ant	Loss	Gain	Duty	Result	Limit	Margin	Remark
				Factor			Factor				
	[MHz]		[dBuV]	[dB/m]	[dB]	[dB]	[dB]	[dBuV/m]	[dBuV/m]	[dB]	
0	0.139	PK	100.4	19.7	-73.9	32.2	0.0	14.0	24.7	10.7	
0	0.151	PK	80.1	19.6	-73.9	32.2	0.0	-6.4	24.0	30.4	
0	0.278	PK	61.6	19.6	-73.9	32.2	0.0	-24.9	18.7	43.6	
0	0.417	PK	55.1	19.6	-73.9	32.1	0.0	-31.3	15.2	46.5	

Result = Reading + Ant Factor + Loss (Cable + Attenuator + Filter + D.Factor) - Gain(Amprifier) + Duty factor \*

#### Result of the fundamental emission at 3m without Distance factor

#### PK or QP

	111 01 Q1											
ſ	Ant Deg [deg]	Frequency	Detector	Reading	Ant	Loss	Gain	Duty	Result	Limit	Margin	Remark
١					Factor			Factor				
ı		[MHz]		[dBuV]	[dB/m]	[dB]	[dB]	[dB]	[dBuV/m]	[dBuV/m]	[dB]	
ſ	0	0.13900	PK	100.4	19.7	6.1	32.2	-	94.0	-	-	Fundamental

 $Result = Reading + Ant\ Factor + Loss\ (Cable + Attenuator + Filter) - Gain (Amprifier)$ 

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<sup>\*</sup> Since the peak emission result satisfied the average limit, duty factor was omitted.

<sup>\*</sup> All spurious emissions lower than this result.

<sup>\*</sup>The test result is rounded off to one or two decimal places, so some differences might be observed.

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## Radiated Emission above 30 MHz (Spurious Emission)

## DATA OF RADIATED EMISSION TEST

Inc. Ise EMC Lab. No.2 Semi Anechoic Chamber Date: 2017/06/27

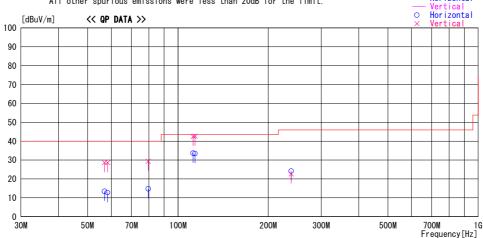
Report No. : 11766072H

Temp./Humi. Engineer : 23deg. C / 42% RH : Yuta Moriya

Mode / Remarks : Tx 134.2KHz Worst-axis(Hori:Ant\_X/ECU\_X Vert:Ant\_X/ECU\_X)

LIMIT : FCC15.209 3m, below 1GHz:QP, above 1GHz:PK All other spurious emissions were less than 20dB for the limit.

Horizontal



Frequency	Reading	DET	Antenna Factor	Loss& Gain	Level	Angle	Height	Polar.	Limit	Margin	Comment
[MHz]	[dBuV]		[dB/m]	[dB]	[dBuV/m]	[Deg]	[cm]		[dBuV/m]	[dB]	
56. 938	26.0	QP	8. 5	-21. 1	13. 4	210	300	Hori.	40. 0	26. 6	
56. 938	41.2	QP	8. 5	-21.1	28. 6	0	100	Vert.	40. 0	11. 4	
58. 333	25.7	QP	8.0	-21.0	12. 7	212	286	Hori.	40. 0	27. 3	
58. 333	41.6	QP	8.0	-21.0	28. 6	3	100	Vert.	40. 0	11.4	
79. 674	43.5	QP	6.6	-20. 7	29. 4	210	100	Vert.	40. 0	10. 6	
79. 674	28. 9	QP	6.6	-20. 7	14. 8	349	230	Hori.	40. 0	25. 2	
112. 344		QP	11.8	-20. 4	33.6	197	283	Hori.	43. 5	9. 9	
112. 344	51.1	QP	11.8	-20. 4	42. 5	284	100	Vert.	43. 5	1.0	
114. 030	41.7	QP	12. 1	-20. 4	33.4	203	284	Hori.	43. 5	10. 1	
114. 030	51.0	QP	12.1	-20. 4	42. 7	285	100	Vert.	43. 5	0.8	
238. 440	31.4	QP	11.6	-18.8	24. 2	147	146	Hori.	46. 0	21.8	
238. 440	29.8	QP	11.6	-18.8	22. 6	114	100	Vert.	46. 0	23. 4	

CHART: WITH FACTOR ANT TYPE: -30MHz:LOOP, 30-200MHz:BICONICAL, 200MHz-1000MHz:LOGPERIODIC, 1000MHz-:HORN CALCULATION: RESULT = READING + ANT FACTOR + LOSS & GAIN(CABLE + ATTEN - GAIN(AMP))

\*The test result is rounded off to one or two decimal places, so some differences might be observed.

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## -26 dB Bandwidth and 99 % Occupied Bandwidth

Test place Ise EMC Lab. No.2 Semi Anechoic Chamber

Tx 134.2 kHz

Order No. 11766072H

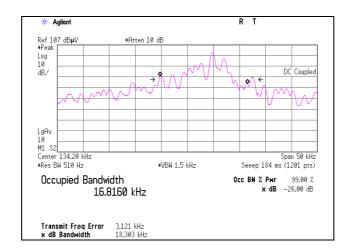
Date June/27/2017

Temperature/ Humidity 23 deg. C / 42 % RH

Engineer Yuta Moriya

Mode

-26 dB Bandwidth	99 % Occupied Bandwidth
[kHz]	[kHz]
18.303	16.8160



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## **APPENDIX 2: Test instruments**

**EMI** test equipment

Control No.	Instrument	Manufacturer	Model No	Serial No	Test Item	Calibration Date * Interval(month)
MAEC-02	Semi Anechoic Chamber(NSA)	TDK	Semi Anechoic Chamber 3m	DA-06902	RE	2016/08/02 * 12
MOS-22	Thermo-Hygrometer	Custom	CTH-201	0003	RE	2016/12/13 * 12
MJM-14	Measure	KOMELON	KMC-36	-	RE	-
COTS-MEMI	EMI measurement program	TSJ	TEPTO-DV	-	RE	-
MSA-16	Spectrum Analyzer	Agilent	E4440A	MY46186390	RE	2017/02/21 * 12
MTR-03	Test Receiver	Rohde & Schwarz	ESCI	100300	RE	2016/10/21 * 12
MLPA-01	Loop Antenna	Rohde & Schwarz	HFH2-Z2	100017	RE	2016/10/14 * 12
MCC-13	Coaxial Cable	Fujikura	3D-2W(12m)/ 5D-2W(5m)/ 5D-2W(0.8m)/ 5D-2W(1m)	-	RE	2017/02/24 * 12
MCC-143	Coaxial Cable	UL Japan	-	-	RE	2017/06/12 * 12
MPA-14	Pre Amplifier	SONOMA INSTRUMENT	310	260833	RE	2017/03/27 * 12
MAT-07	Attenuator(6dB)	Weinschel Corp	2	BK7970	RE	2016/11/28 * 12
MMM-01	Digital Tester	Fluke	FLUKE 26-3	78030611	RE	2016/08/23 * 12
MBA-08	Biconical Antenna	Schwarzbeck	VHA9103B	08031	RE	2016/09/29 * 12
MLA-21	Logperiodic Antenna(200-1000MHz)	Schwarzbeck	VUSLP9111B	911B-190	RE	2017/01/05 * 12
MCC-12	Coaxial Cable	Fujikura/Agilent	-	-	RE	2017/02/24 * 12
MPA-09	Pre Amplifier	Agilent	8447D	2944A10845	RE	2016/09/13 * 12

The expiration date of the calibration is the end of the expired month.

All equipment is calibrated with valid calibrations. Each measurement data is traceable to the national or international standards.

As for some calibrations performed after the tested dates, those test equipment have been controlled by means of an unbroken chains of calibrations.

**Test Item:** 

**RE: Spurious emission** 

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