



FCC PART 15, SUBPART C TEST REPORT

For

Everex Communications, Inc.

1045 Mission Ct.,
Fremont, CA 94539, USA

FCC ID: TF7WT-42-1000

Report Type: Original Report	Product Type: HVAC Thermostat
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Note: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA*, NIST, or any agency of the Federal Government.

* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "*" Rev. 03

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1906281-247	Original Report	2019-11-23

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Everex Communications*, and their product model: WT-42, FCC ID: TF7WT-42-1000, or the “EUT” as referred to in this report. It is an thermostat whose function is to maintain the desired temperature inside room by controlling the operation of a HVAC system. The EUT operates in the frequency range from 2405 to 2480 MHz.

1.2 Objective

This report is prepared on behalf of *Everex Communications*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules.

The objective is to determine compliance with FCC Part 15 rules for Output Power, Antenna Requirements, 6 dB Bandwidth, Power Spectral Density, 100 kHz Bandwidth of Band Edges Measurement, Conducted and Radiated Spurious Emissions and co-location with pre-certified module FCC ID: VNR-ATSAMZ210PA-0.

1.3 Related Submittal(s)/Grant(s)

N/A

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.6 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03) to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Industry Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.

- For Singapore (Info-Communications Development Authority (IDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2

2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;

- Canada: (Innovation, Science and Economic development Canada - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PSD across all data rates bandwidths, and modulations.

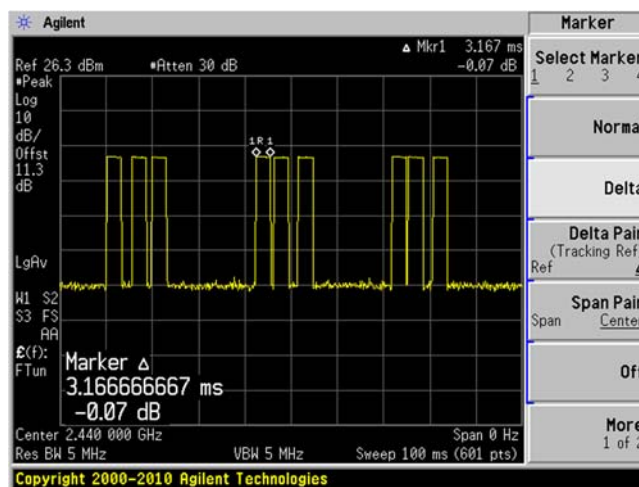
2.2 Duty Cycle

According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

Pulse Width (ms)	Max-Pulses observed in Period	Max-On Time per 100ms Period (ms)	Duty Cycle (%)
3.167	9	28.503	28.5

Please refer to the following plot



2.3 Interface Ports and Cabling

Cable Description	Length	To	From
Power Cable	6 ft	EUT	24V AC Transformer
External I/O Cable	6 ft	Draped Along Table	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC	Description of Test	Results
FCC §15.203	Antenna Requirement	Compliant
FCC §15.207	AC Line Conducted Emissions	Compliant
FCC §2.1091, §15.247(i)	MPE	Compliant
FCC §2.1051, §15.247 (d)	Spurious Emissions at Antenna Port	Compliant
FCC §2.1053, §15.205, §15.209, §15.247 (d)	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2)	6 dB and 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3)	Output Power	Compliant
FCC §15.247(d)	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §15.247(e)	Power Spectral Density	Compliant

4 FCC §15.203 - Antenna Requirements

4.1 Applicable Standards

According to FCC §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.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

4.2 Antenna Description

The antennas used by the EUT are permanent attached antennas.

Frequency Range (MHz)	External/ Internal/Integral	Max Gain (dBi)	Antenna Type/ Pattern
2405 - 2480	Integral	3.5	PCB F antenna

5 FCC §2.1091, §15.247 (i) - RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i), and §1.1307(b)(1), 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 level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* (180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

* = Plane-wave equivalent power density

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

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

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

3.1 MPE Results

Maximum average output power at antenna input terminal (dBm): 13.53

Maximum average output power at antenna input terminal (mW): 22.54

Prediction distance (cm): 20

Prediction frequency (MHz): 2405

Maximum Antenna Gain, typical (dBi): 3.5

Maximum Antenna Gain (numeric): 2.24

Power density of prediction frequency at 30.0 cm (mW/cm²): 0.01

FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 1

3.2 Radio Co-location

RF Exposure value from FCC ID: VNR-ATSAMZ210PA-0 is 0.0002 mW/cm². Total MPE ratio is

$$0.0002+0.01 = 0.0102 < 1.$$

6 FCC §15.207 - AC Line Conducted Emissions

6.1 Applicable Standards

As per FCC §15.207 Conducted limits:

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 30 MHz shall not exceed the limits in the following table, 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 of Emission (MHz)	Conducted Limit (dBuV)	
	Quasi-Peak	Average
0.15-0.5	66 to 56 ^{Note1}	56 to 46 ^{Note2}
0.5-5	56	46
5-30	60	50

Note1: Decreases with the logarithm of the frequency.

Note2: A linear average detector is required

6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.207 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

The 24V AC transformer of the EUT was connected with LISN-1 which provided 120 V / 60 Hz AC power.

6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cords of support equipment were connected to LISN-2.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data were recorded in the peak, quasi-peak, and average detection mode. Quasi-Peak readings are distinguished with a "QP." Average readings are distinguished with an "Ave".

6.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Cable Loss (CL), the Attenuator Factor (Atten) to indicated Amplitude (Ai) reading. The basic equation is as follows:

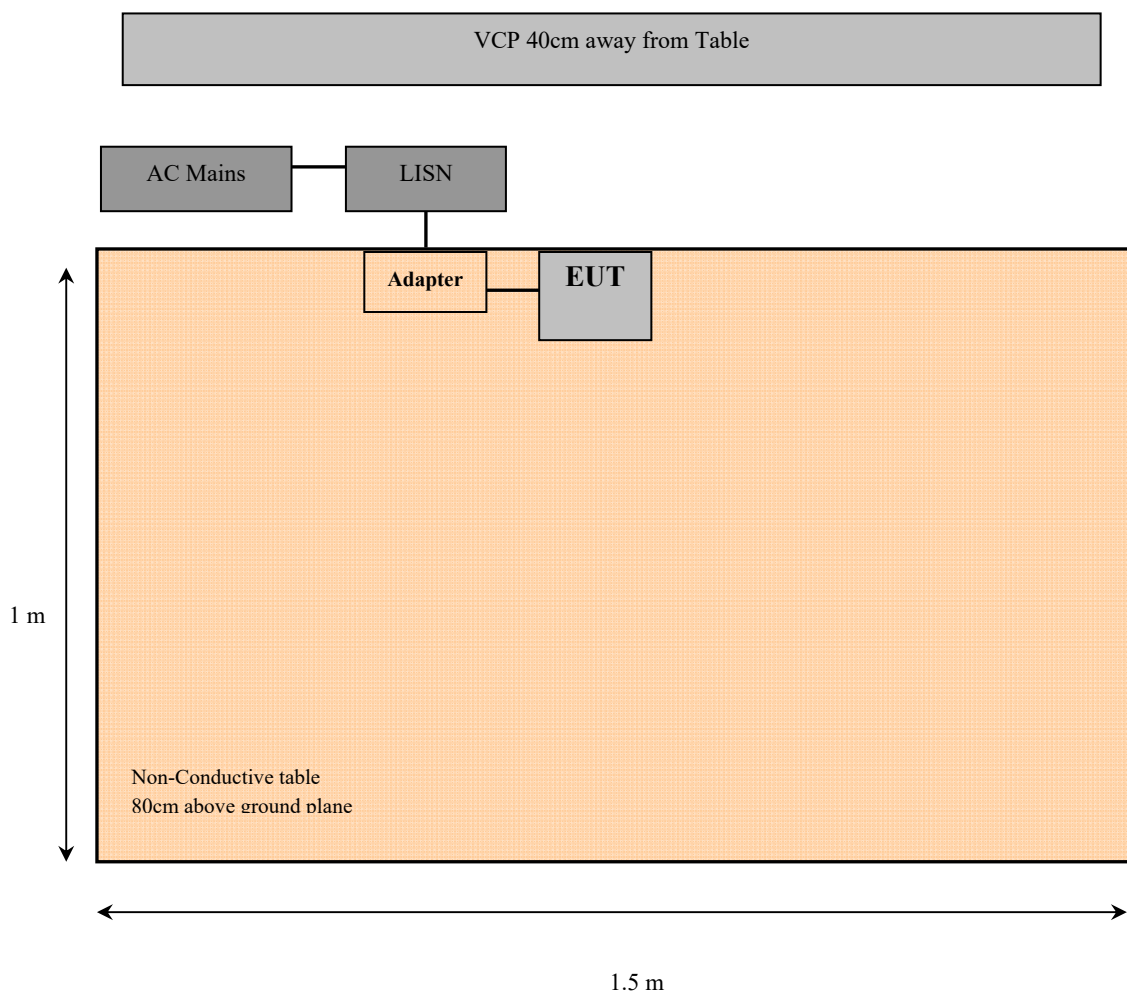
$$CA = A_i + CL + \text{Atten}$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 dB) + Attenuator (10 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

6.5 Test Setup Block Diagram



6.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101964	2019-07-31	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150204	2019-02-25	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2019-04-11	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

6.7 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	101.31 kPa

The testing was performed by Matthew Riego de Dios on 2019-10-29 in 5 chamber 3.

6.8 Summary of Test Results

According to the recorded data in following table, the EUT complied with the FCC 15C standard's conducted emissions limits, with the margin reading of:

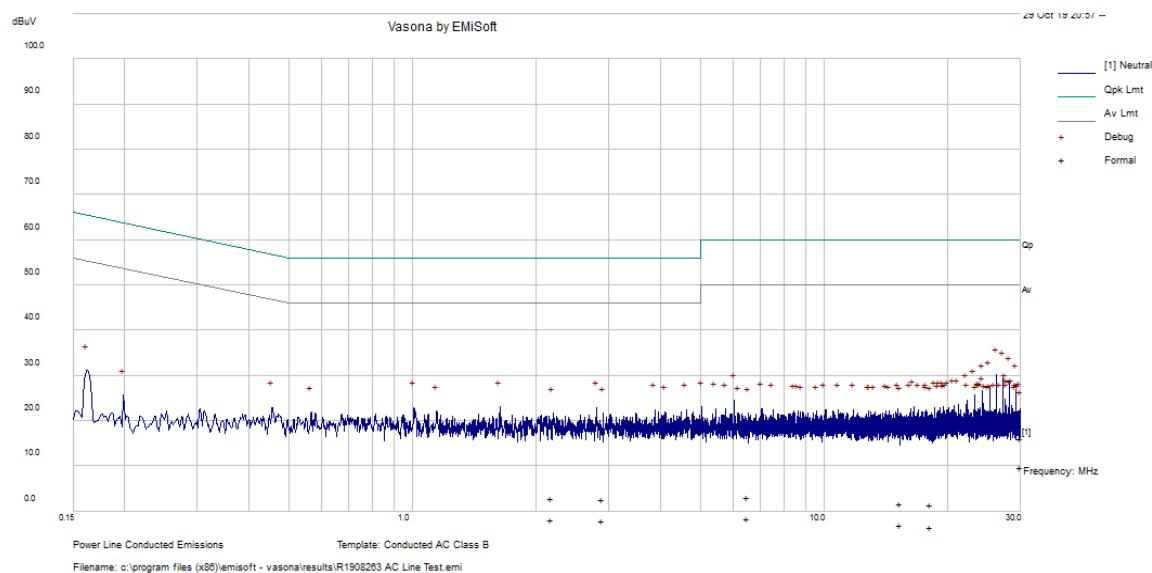
Co-location with pre-certified module FCC ID: VNR-ATSAMZ210PA-0

Connection: 24V AC tranformer connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-24.85	26.208494	Neutral	0.15-30

6.9 Conducted Emissions Test Plots and Data

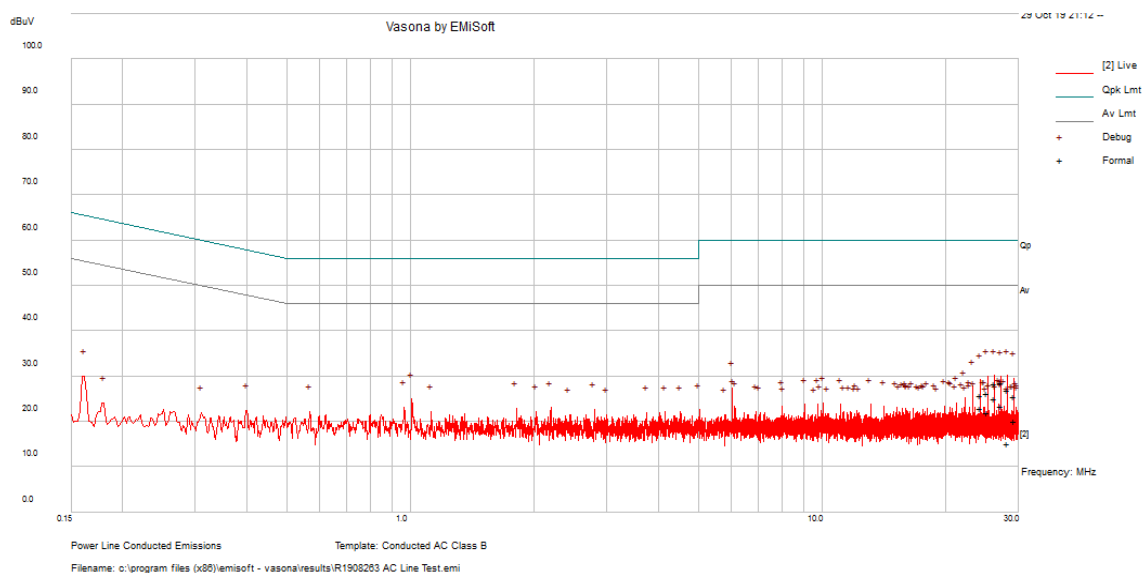
Co-location with pre-certified module FCC ID: VNR-ATSAMZ210PA-0

120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
2.176732	2.93	Neutral	56	-53.07	QP
2.886511	2.74	Neutral	56	-53.26	QP
18.179394	1.45	Neutral	60	-58.55	QP
15.299695	1.64	Neutral	60	-58.36	QP
6.53375	3.14	Neutral	60	-56.86	QP
29.992042	16.07	Neutral	60	-43.93	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
2.176732	-1.89	Neutral	46	-47.89	Ave.
2.886511	-2.03	Neutral	46	-48.03	Ave.
18.179394	-3.43	Neutral	50	-53.43	Ave.
15.299695	-3.05	Neutral	50	-53.05	Ave.
6.53375	-1.69	Neutral	50	-51.69	Ave.
29.992042	9.64	Neutral	50	-40.36	Ave.

120 V, 60 Hz – Neutral

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
26.208494	28.44	Line	60	-31.56	QP
28.218554	26.85	Line	60	-33.15	QP
25.194764	26.25	Line	60	-33.75	QP
27.214755	28.65	Line	60	-31.35	QP
29.230837	25.53	Line	60	-34.47	QP
24.196317	25.74	Line	60	-34.26	QP

Frequency (MHz)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
26.208494	25.15	Line	50	-24.85	Ave.
28.218554	15.12	Line	50	-34.88	Ave.
25.194764	22	Line	50	-28	Ave.
27.214755	23.37	Line	50	-26.63	Ave.
29.230837	20.02	Line	50	-29.98	Ave.
24.196317	23.02	Line	50	-26.98	Ave.

7 FCC §15.209, §15.247(d) - Spurious Radiated Emissions

7.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show 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		
0.495 – 0.505	16.69475 – 16.69525	960 – 1240	4.5 – 5.15
2.1735 – 2.1905	16.80425–16.80475	1300 – 1427	5.35 – 5.46
4.125 – 4.128	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.17725 – 4.17775	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.20725 – 4.20775	73 – 74.6	1660 – 1710	9.0 – 9.2
6.215 – 6.218	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.26775 – 6.26825	108 – 121.94	2200 – 2300	10.6 – 12.7
6.31175 – 6.31225	123 – 138	2310 – 2390	13.25 – 13.4
8.291 – 8.294	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.362 – 8.366	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.37625 – 8.38675	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.41425 – 8.41475	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
12.29 – 12.293	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.51975 – 12.52025	240 – 285	3.600 – 4.400	31.2 – 31.8
12.57675 – 12.57725	322 – 335.4		36.43 – 36.5
13.36 – 13.41	399.9 – 410		Above 38.6
	608 – 614		

As per FCC §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 the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §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. 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) (see §15.205(c)).

7.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

7.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW = 10Hz or 1/T / Sweep = Auto

7.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “**Margin**” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

7.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Receiver, EMI Test	ESCI 1166.5950.03	100338	2018-07-05	2 year
Agilent	Analyzer, Spectrum	E4446A	US44300386	2019-06-26	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2018-02-26	2 year
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2019-04-02	2 years
Antenna, Horn	ARH-4223-02	10555-01	2018-01-18	2 years	Antenna, Horn
Agilent	Amplifier, Pre	8447D	2944A10187	2019-04-11	1 year
HP	Pre-Amplifier	8449B	3008A01978	2019-09-27	1 year
Insulated Wire Corp.	157 Series 2.92 SM (x2) Armored 33 ft. Cable	KPS-1571AN- 3960-KPS	DC 1917	2019-05-08	1 Year
-	SMA cable	-	C0002	Each time ¹	N/A
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.

7.6 Test Environmental Conditions

Temperature:	20-22 °C
Relative Humidity:	42-50 %
ATM Pressure:	102.7 kPa

The testing was performed by Christian McCaig on 2019-10-23 in 5m chamber 3.

7.7 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C standard's radiated emissions limits, and had the worst margin of:

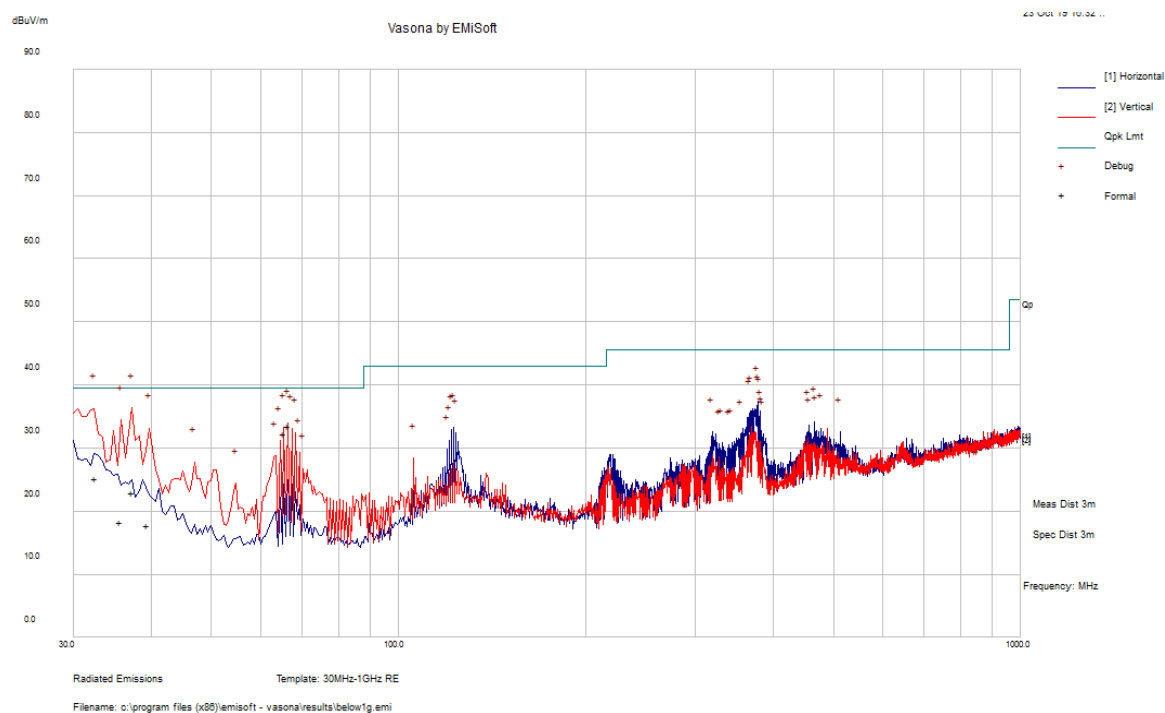
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	channel
-5.072	2483.5	Vertical	High Channel

Please refer to the following table and plots for specific test result details

7.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

Co-location with pre-certified module FCC ID: VNR-ATSAMZ210PA-0



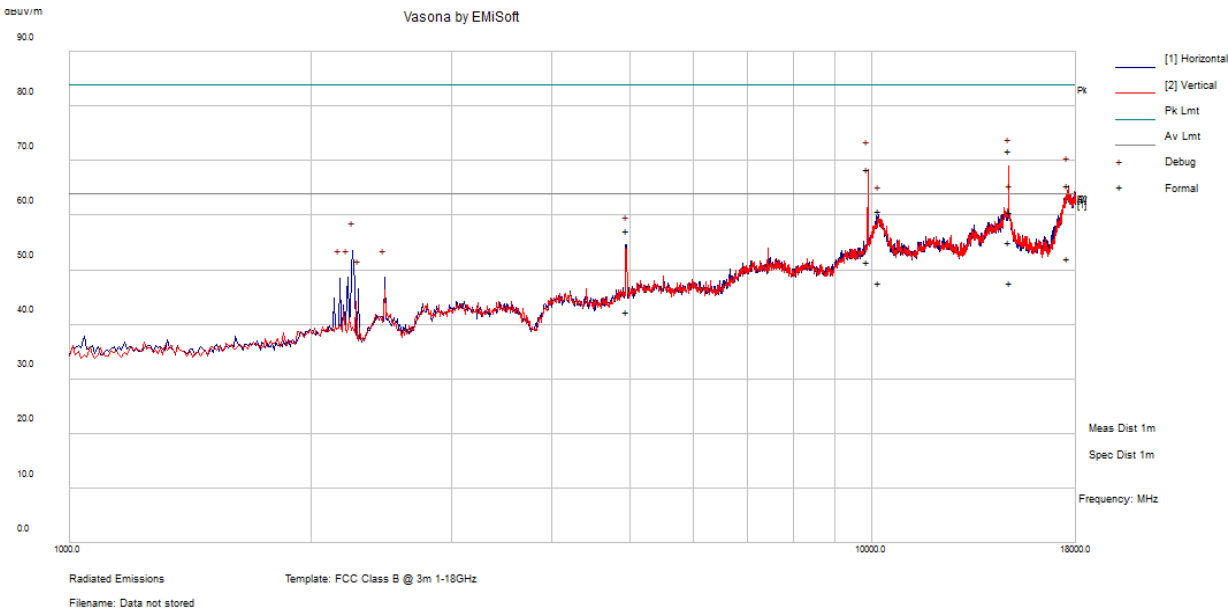
Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
37.2415	22.93	129	V	132	39.5	-16.57	QP
32.5915	25.2	120	V	346	39.5	-14.3	QP
35.66525	18.37	266	V	297	39.5	-21.13	QP
66.471	33.59	154	V	29	39.5	-5.91	QP
65.45025	32.35	133	V	37	39.5	-7.15	QP
39.4705	17.83	263	V	12	39.5	-21.67	QP

2) 1–25 GHz Measured at 3 meters

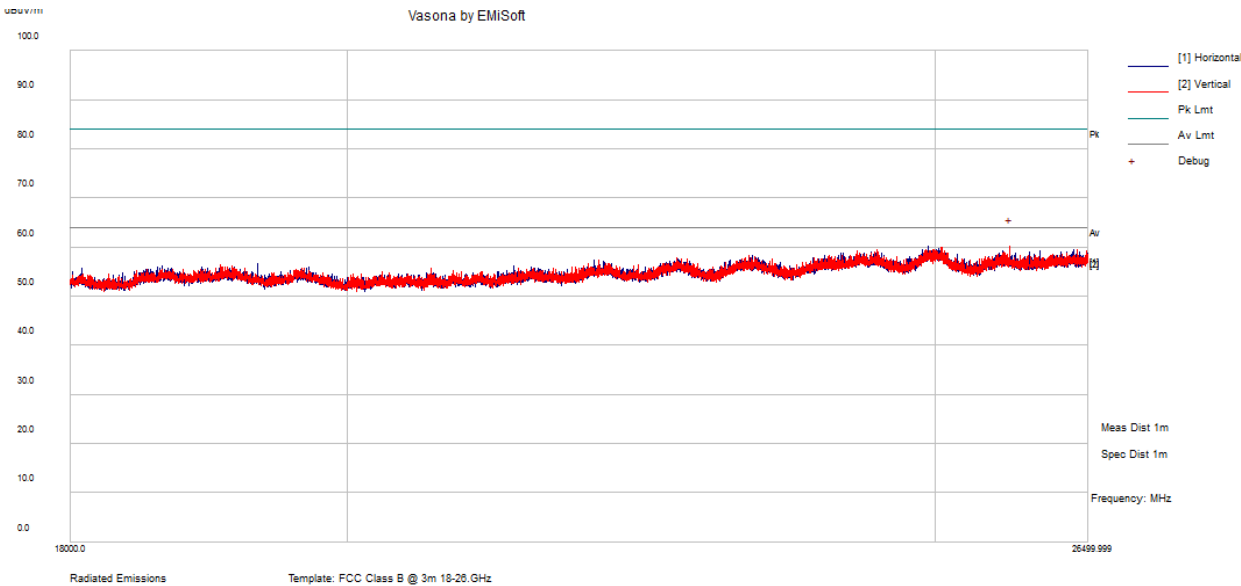
Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel											
2390	67.82	280	300	V	28.89	5.621	36.162	66.169	74	-7.831	Peak
2390	69.19	330	170	H	28.865	5.621	36.162	67.514	74	-6.486	Peak
2390	41.01	280	300	V	28.89	5.621	36.162	39.359	54	-14.641	Ave
2390	41.96	330	170	H	28.865	5.621	36.162	40.284	54	-13.716	Ave
4810	51.74	57	240	V	32.454	8.469	35.902	56.761	74	-17.239	Peak
4810	49.53	165	262	H	32.455	8.469	35.902	54.552	74	-19.448	Peak
4810	39.40	57	240	V	32.454	8.469	35.902	44.421	54	-9.579	Ave
4810	36.89	165	262	H	32.455	8.469	35.902	41.912	54	-12.088	Ave
7215	47.19	30	170	V	36.754	11.192	35.251	59.885	74	-14.115	Peak
7215	48.10	108	175	H	36.901	11.192	35.251	60.942	74	-13.058	Peak
7215	34.04	30	170	V	36.754	11.192	35.251	46.735	54	-7.265	Ave
Middle Channel											
4880	49.83	330	170	V	32.732	8.545	35.8	55.307	74	-18.693	Peak
4880	50.04	297	108	H	32.769	8.545	35.8	55.554	74	-18.446	Peak
4880	37.99	330	170	V	32.732	8.545	35.8	43.467	54	-10.533	Ave
4880	37.27	297	108	H	32.769	8.545	35.8	42.784	54	-11.216	Ave
7320	45.44	30	260	V	37.043	11.776	35.275	58.984	74	-15.016	Peak
7320	46.22	60	160	H	37.075	11.776	35.275	59.796	74	-14.204	Peak
7320	32.38	30	260	V	37.043	11.776	35.275	45.924	54	-8.076	Ave
7320	33.24	60	160	H	37.075	11.776	35.275	46.816	54	-7.184	Ave
High Channel											
2483.5	67.14	260	270	V	29.095	5.751	36.148	65.838	74	-8.162	Peak
2483.5	67.54	230	280	H	29.169	5.751	36.148	66.312	74	-7.688	Peak
2483.5	50.23	260	270	V	29.095	5.751	36.148	48.928	54	-5.072	Ave
2483.5	49.93	230	280	H	29.169	5.751	36.148	48.702	54	-5.298	Ave
4960	50.53	222	105	V	32.74	8.634	35.732	56.172	74	-17.828	Peak
4960	49.56	45	300	H	32.734	8.634	35.732	55.196	74	-18.804	Peak
4960	38.41	222	105	V	32.74	8.634	35.732	44.052	54	-9.948	Ave
4960	37.35	45	300	H	32.734	8.634	35.732	42.986	54	-11.014	Ave
7440	45.48	25	190	V	37.069	11.396	35.383	58.562	74	-15.438	Peak
7440	46.34	130	100	H	37.088	11.396	35.383	59.441	74	-14.559	Peak
7440	31.89	25	190	V	37.069	11.396	35.383	44.972	54	-9.028	Ave
7440	33.47	130	100	H	37.088	11.396	35.383	46.571	54	-7.429	Ave

Co-location with pre-certified module FCC ID: VNR-ATSAMZ210PA-0

1 GHz – 18 GHz Worst Case Scan at 1 Meter



18 GHz – 26.5 2.4GHz Worst Case Scan at 1 Meter



8 FCC §15.247(a) (2) -Emission Bandwidth

8.1 Applicable Standards

According to ECFR §15.247(a) (2), systems using digital modulation techniques may operate in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz

8.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth

8.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rhode & Schwarz	Analyzer, Spectrum	FSV40	1321.3008K39-101203-UW	2019-08-06	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

8.4 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2019-10-17 in RF site.

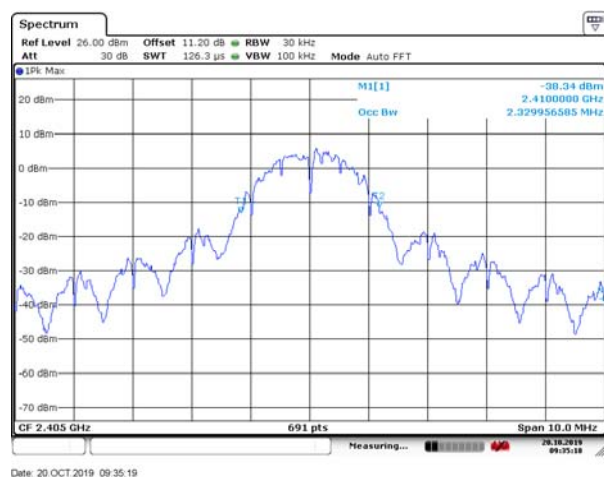
8.5 Test Results

Channel	Frequency (MHz)	99% OBW (kHz)	6 dB BW (kHz)	6 dB OBW limit (kHz)
Low	2405	2330	1577	500
Middle	2440	2373	1606	500
High	2480	2431	1476	500

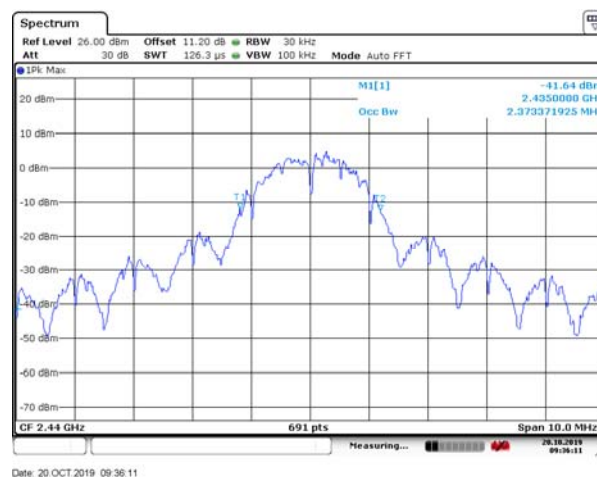
Please refer to the following plots for detailed test results.

99% OBW

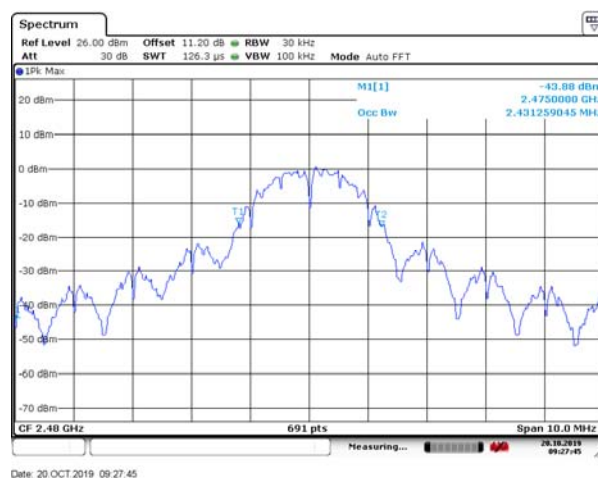
Low Channel 2405 MHz



Middle Channel 2440 MHz

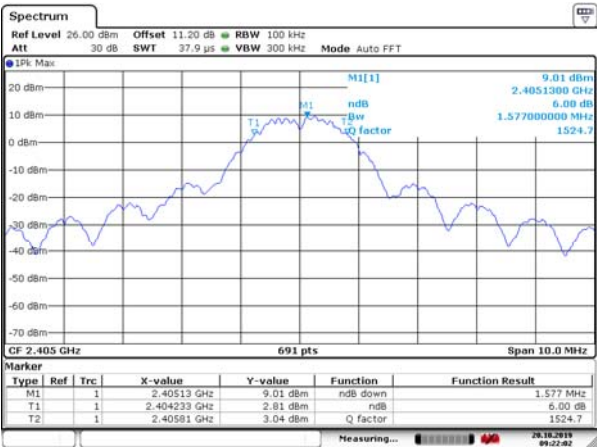


High Channel 2480 MHz

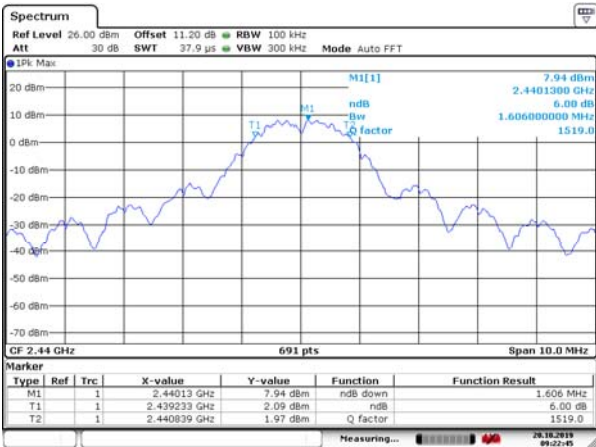


6dB OBW

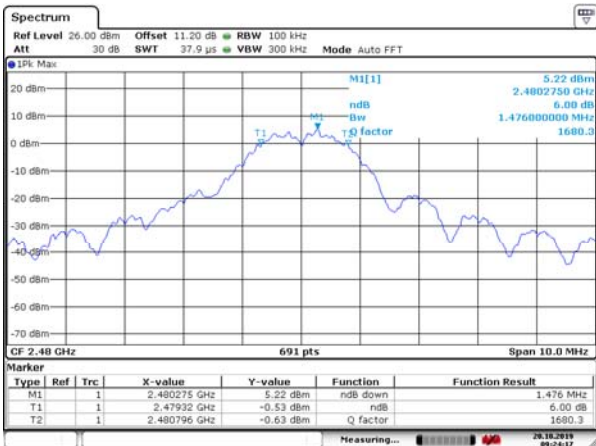
Low Channel 2405 MHz



Middle Channel 2440 MHz



High Channel 2480 MHz



9 FCC §15.247(b) (3) - Output Power Measurement

9.1 Applicable Standards

According to ECFR §15.247(b) (3) for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 9: Fundamental emission output power

9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
ETS-Lindgren	Power Sensor	7002-006	160097	2019-02-06	1 year
-	RF Cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

9.4 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2019-10-24 in RF site.

9.5 Test Results

Average Output Power

Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Limit (dBm)
Low	2405	13.53	30
Middle	2440	12.55	30
High	2480	8.58	30

10 FCC §15.247(d)– 100 kHz Bandwidth of Band Edges

10.1 Applicable Standards

According to ECFR §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum 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. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

10.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 13: Band-edge measurements

10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rhode & Schwarz	Analyzer, Spectrum	FSV40	1321.3008K39-101203-UW	2019-08-06	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

10.4 Test Environmental Conditions

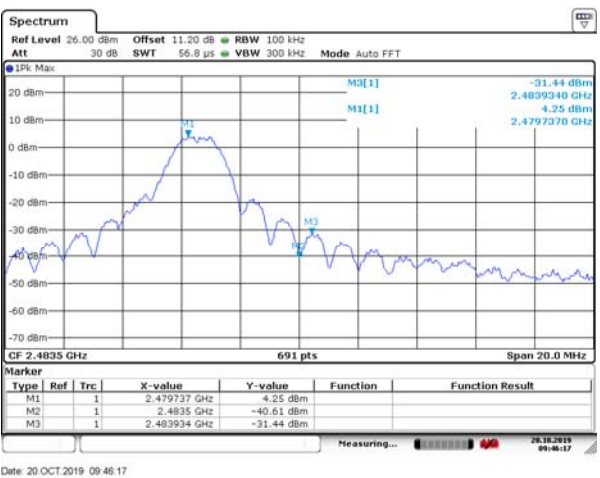
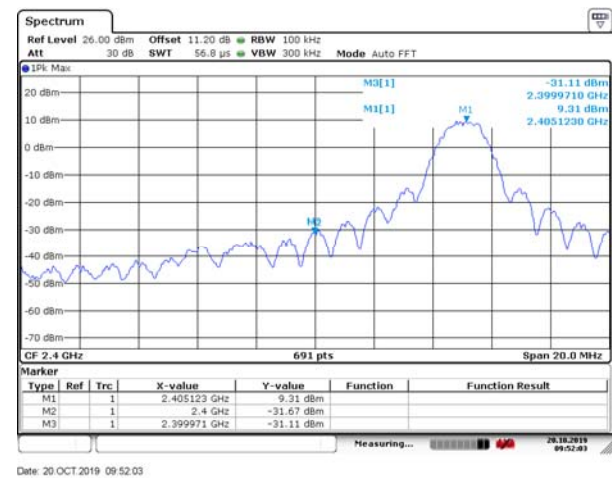
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2019-10-24 in RF site.

10.5 Test Results

Low Channel 2405 MHz

High Channel 2480 MHz



11 FCC §15.247(e)– Power Spectral Density

11.1 Applicable Standards

According to ECFR §15.247(e) and RSS-247 §5.2 (2) , for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

11.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 10: Maximum power spectral density level in the fundamental emission.

11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rhode & Schwarz	Analyzer, Spectrum	FSV40	1321.3008K39-101203-UW	2019-08-06	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

11.4 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

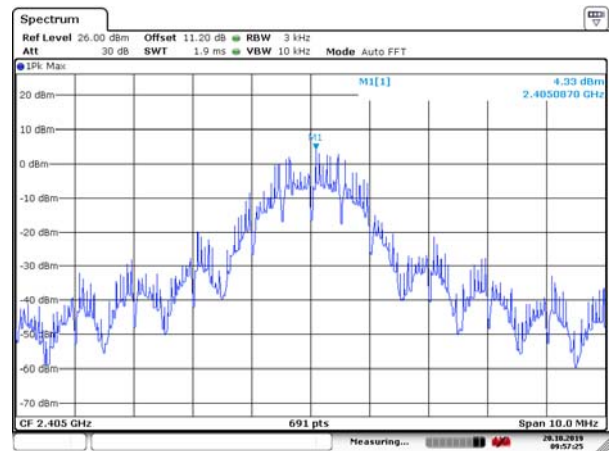
The testing was performed by Christian McCaig on 2019-10-24 in RF site.

11.5 Test Results

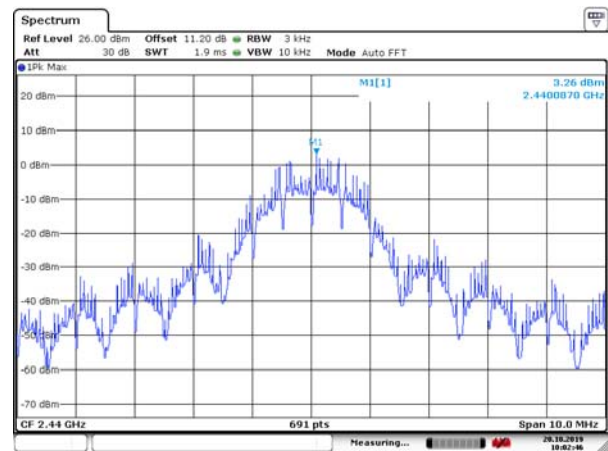
Channel	Frequency (MHz)	PSD (dBm/3kHz)	Limit (dBm/3kHz)
Low	2405	4.33	8
Middle	2440	3.26	8
High	2480	-1.16	8

Please refer to the following plots for detailed test results

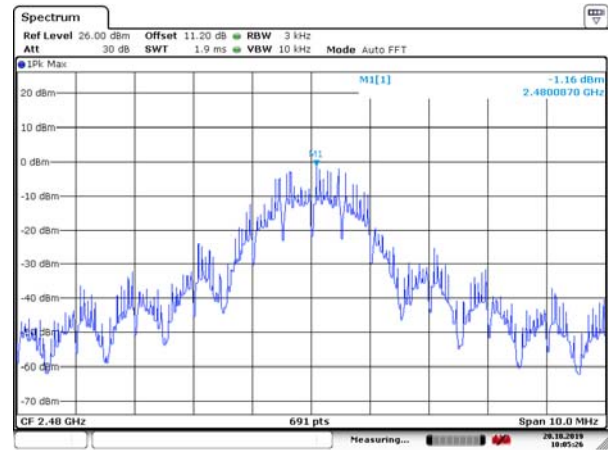
Low Channel 2405 MHz



Middle Channel 2440 MHz



High Channel 2480 MHz



12 FCC §15.247(d)– Spurious Emissions at Antenna Terminals

12.1 Applicable Standards

For ECFR §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. 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) (see §15.205(c)).

12.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

12.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rhode & Schwarz	Analyzer, Spectrum	FSV40	1321.3008K39-101203-UW	2019-08-06	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

12.4 Test Environmental Conditions

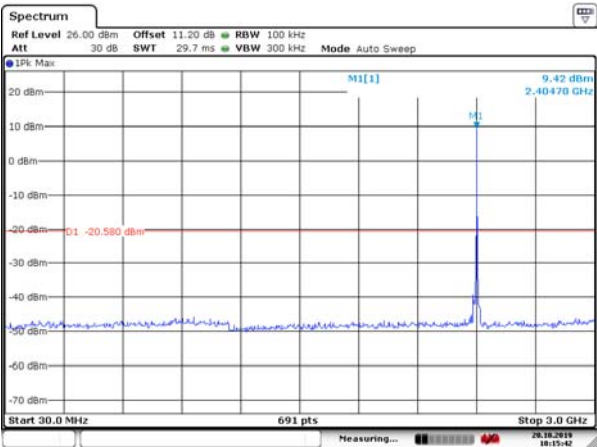
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Christian McCaig on 2019-10-24 in RF site.

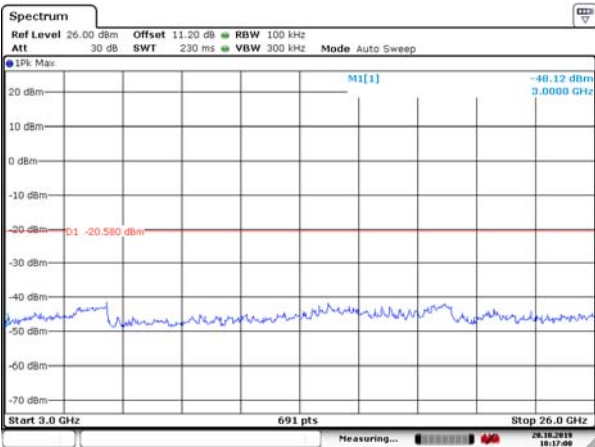
12.5 Test Results

Please refer to following plots.

Low Channel

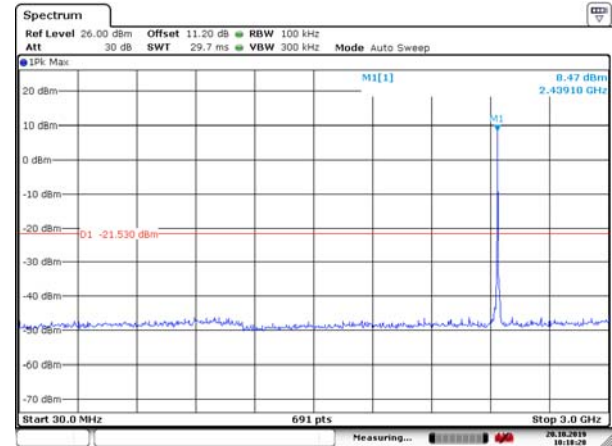


Date: 20.OCT.2019 10:15:42

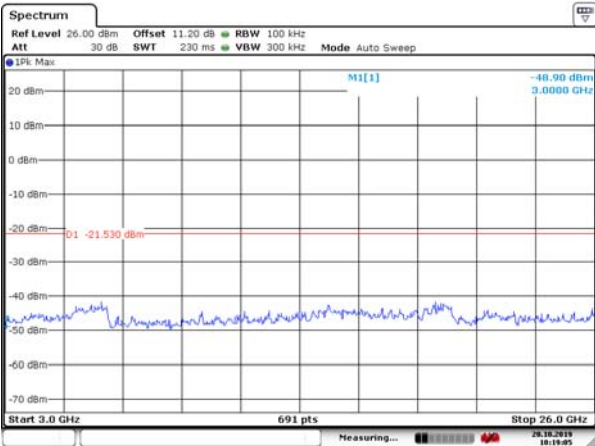


Date: 20.OCT.2019 10:17:00

Middle Channel

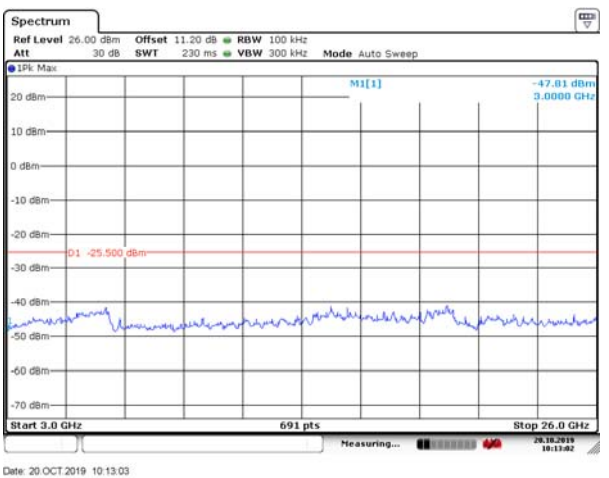
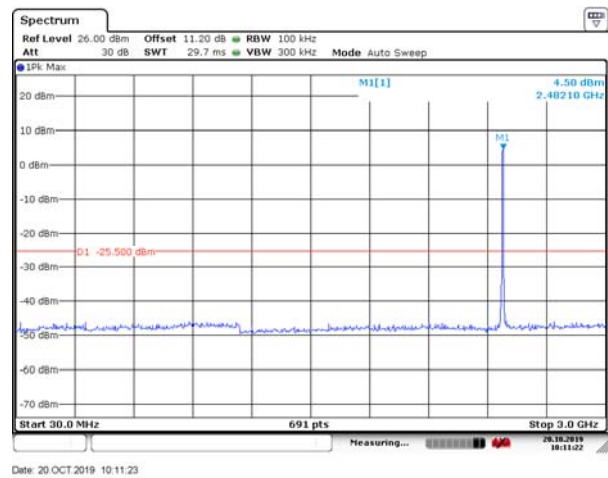


Date: 20.OCT.2019 10:18:29



Date: 20.OCT.2019 10:19:06

High Channel



13 Annex A – EUT Test Setup Photographs

Please refer to the attachment.

14 Annex B – EUT External Photographs

Please refer to the attachment.

15 Annex C – EUT Internal Photographs

Please refer to the attachment.

16 Annex D (Normative) - A2LA Electrical Testing Certificate

Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---