

# RADIO TEST REPORT – 404914-1TRFWL

Type of assessment:

**Modular permissive change**

Applicant:

**Trilliant Networks Inc.**

Product name (type):

**SecureMesh Radio Module**

Model:

**CL-R0368A-1.3**

Model variant(s):

**CL-R0353A-6.3**

**CL-R0368B-1.1**

FCC ID:

**TMB-OSDI4W1**

IC Registration number:

**6028A-OSDI4W1**

Specifications:

- ◆ FCC 47 CFR Part 15 Subpart C, §15.247
- ◆ RSS-247, Issue 2, Feb 2017, Section 5

Date of issue: January 26, 2021

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**Yong Huang, EMC/RF Specialist**

Tested by

  
Signature

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**Andrey Adelberg, Senior EMC/RF Specialist**

Reviewed by

  
Signature

Nemko Canada Inc., a testing laboratory, is accredited by the Standards Council of Canada.  
The tests included in this report are within the scope of this accreditation

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**Lab locations**

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Test site registration	<b>Organization</b> <b>Recognition numbers and location</b>			
	FCC/ISED      FCC: CA2040; IC: 2040A-4 (Ottawa/Almonte); FCC: CA2041; IC: 2040G-5 (Montreal); CA0101 (Cambridge)			
Website	<a href="http://www.nemko.com">www.nemko.com</a>			

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**Limits of responsibility**

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Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contained in this report are within Nemko Canada's ISO/IEC 17025 accreditation.

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## Report summary

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### 1.1 Test specifications

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See	FCC 47 CFR Part 15, Subpart C, Clause 15.247 RSS-247, Issue 2, Feb 2017, Section 5	Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–585 MHz Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices
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### 1.2 Test methods

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558074 D01 15.247 Meas Guidance v05r02 (April 2, 2019)	Guidance for compliance measurements on digital transmission system, frequency hopping spread spectrum system, and hybrid system devices operating under section 15.247 of the FCC rules.
ANSI C63.10 v2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
RSS-102, Issue 5, March 19, 2015	Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)

### 1.3 Exclusions

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As per customer's quotation, this report is for purpose of permissive change, which adding a digital modulation mode to the original grant. All other modulations modes are excluded from the scope of this report.

### 1.4 Statement of compliance

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In the configuration tested, the EUT was found compliant.

Testing was performed against all relevant requirements of the test standard except as noted in section 1.3 above. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See "Summary of test results" for full details.

### 1.5 Test report revision history

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**Table 1.5-1: Test report revision history**

Revision #	Date of issue	Details of changes made to test report
TRF	January 26, 2021	Original report issued

## Engineering considerations

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### 2.1 Modifications incorporated in the EUT for compliance

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There were no modifications performed to the EUT during this assessment.  
Section 2

### 2.2 Technical judgment

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As per customer provided, the tested sample is representative case for all model variants. The differences of variants are as described below:

CL-R0353A-6.3 is the original model with less performances. CL-R0368A-1.3 is an HW improvement adding an RF switch and an attenuator to increase the output power range mostly on the low side in order to reach down low power markets like Europe. The CL-R0368B-1.1 has the same layout as the A version but without the HW improvement.

### 2.3 Deviations from laboratory tests procedures

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No deviations were made from laboratory procedures.

## Test conditions

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### 3.1 Atmospheric conditions

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Temperature	15 °C – 35 °C
Relative humidity	20 % – 75 %
Air pressure	86 kPa (860 mbar) – 106 kPa (1060 mbar)

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

### 3.2 Power supply range

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The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages  $\pm 5\%$ , for which the equipment was designed.

## Measurement uncertainty

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### 4.1 Uncertainty of measurement

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Section 4  
UKAS Lab 34 and TIA-603-B have been used as guidance for measurement uncertainty reasonable estimations with regards to previous experience and validation of data. Nemko Canada, Inc. follows these test methods in order to satisfy ISO/IEC 17025 requirements for estimation of uncertainty of measurement for wireless products.

Measurement uncertainty budgets for the tests are detailed below. Measurement uncertainty calculations assume a coverage factor of  $K = 2$  with 95% certainty.

**Table 4.1-1: Measurement uncertainty calculations for Radio**

Test name	Measurement uncertainty, $\pm$ dB
All antenna port measurements	0.55
Occupied bandwidth	4.45
Conducted spurious emissions	1.13
Radiated spurious emissions	3.78
AC power line conducted emissions	3.55

## Information provided by the applicant

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### 5.1 Disclaimer

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This section contains information provided by the applicant and has been utilized to support the test plan. Inaccurate information provided by the applicant can affect the validity of the results contained within this test report. Nemko accepts no responsibility for the information contained within this section and the impact it may have on the test plan and resulting measurements.

### 5.2 Applicant

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Company name	Trilliant Networks Inc.
Address	401 Harrison Oaks Blvd, Suite 300 Cary, NC, USA 27513

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### 5.3 Manufacturer

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Company name	Trilliant Networks Inc.
Address	401 Harrison Oaks Blvd, Suite 300 Cary, NC, USA 27513

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### 5.4 EUT information

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Product name	SecureMesh Radio Module
Model	CL-R0368A-1.3
Model variant(s)	CL-R0353A-6.3, CL-R0368B-1.1
Serial number	NEFC0002244
Part number	CL-R0368A-1.3 hosted by CL-R0349D-3.8
Operating conditions	EUT was set to Continuous TX mode for wireless tests. FW version: wpan-radio: 1.1.0+0.158f376 6LR Core: 1.1.0+0.8028241
Product description and theory of operation	The OSDI module is a self-contained, LGA mounted, 2.4 GHz radio providing Trilliant SecureMesh ready connectivity to a variety of host devices. Trilliant SecureMesh connectivity is based on IEEE 802.15.4g wireless communications.

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5.5 Technical information
 

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Applicant IC company number	6028A
IC UPN number	OSDI4W1
All used IC test site(s) Reg. number	2040G-5
RSS number and Issue number	RSS-247 Issue 2, Feb 2017
Category of Wideband Data Transmission equipment	<input type="checkbox"/> Frequency Hopping Spread Spectrum (FHSS) equipment <input checked="" type="checkbox"/> Other types of Wideband Data Transmission equipment (e.g. DSSS, OFDM, etc.).
Frequency band	2400–2483.5 MHz
Frequency Min (MHz)	2409.6
Frequency Max (MHz)	2467.2
Channel numbers	channel 7 to 55 included, possibility of 68 channels
RF power Max (W), Conducted	0.8128 (29.1 dBm)
Measured BW (kHz), 99% OBW	1138.6
Type of modulation	OFDM Option1
Emission classification	F1D
Transmitter spurious, dB $\mu$ V/m @ 3 m	53.1, average at 4879.4 MHz
Power supply requirements	14.5 VDC

Table 5.5-1: Antenna information

Antenna type	Manufacturer	Model number	Maximum gain	Connector type
Dipole	Trilliant	CP-0299A (M antenna)	4.8 dBi	On board
Monopole	Linx	ANT-2.4uSP	3.8 dBi	Surface Mount
Dipole	Larsen	RO2406NM	6 dBi	Type-N Male
Monopole	MobileMark	IMAG5-2400	5 dBi	TNC Plug-RP
Dipole	L-Com	HG2403RD-RTF	3 dBi	TNC Plug-RP
Dipole	MobileMark	CVS-2400	2.5 dBi	SMA Plug-RP
Dipole	Molex	1461530100	3 dBi	u.fl

## 5.6 EUT setup details

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### 5.6.1 EUT Exercise and monitoring

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**Methods used to exercise the EUT and all relevant ports:**

- EUT was exercised through a Command Line Interface (CLI) using a serial port.
- EUT was tested in continuous transmit and receive mode on high/middle/low channels.

**Configuration details:**

- The EUT setup in a configuration that was expected to produce the highest amplitude emissions relative to the limit and that satisfy normal operation/installation practice by the end user.
- The type and construction of cables used in the measurement set-up were consistent with normal or typical use. Cables with mitigation features (for example, screening, tighter/more twists per length, ferrite beads) have been noted below:
  - The following deviations were:
  - None
- The EUT was setup in a manner that was consistent with its typical arrangement and use. The measurement arrangement of the EUT, local AE and associated cabling was representative of normal practice. Any deviations from typical arrangements have been noted below:
  - The following deviations were:
  - None

**Monitoring details:**

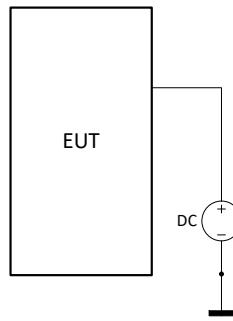
- EUT was configured and monitored by client on site.

### 5.6.2 EUT test configuration

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**Table 5.6-1: EUT sub assemblies**

Description	Brand name	Model, Part number, Serial number, Revision level
SecureMesh Radio Module	Trilliant	MN: OSDI-4000-1x, PN: CL-R0368A-1.3 hosted by CL-R0349D-3.8, SN: NEFC0002244 Rev. 1.3

**Figure 5.6-1: Testing block diagram**

## Summary of test results

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### 6.1 Testing location

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Test location (s)	Montreal
Section 6	

### 6.2 Testing period

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Test start date	August 19, 2020	Test end date	August 24, 2020
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### 6.3 Sample information

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Receipt date	August 19, 2020	Nemko sample ID number(s)	1
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### 6.4 FCC Part 15 Subpart C, general requirements test results

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**Table 6.4-1: FCC general requirements results**

Part	Test description	Verdict
§15.207(a)	Conducted limits	Not applicable
§15.311	Variation of power source	Pass
§15.31(m)	Number of tested frequencies	Pass
§15.203	Antenna requirement	Pass

Notes: EUT is an DC powered device.

### 6.5 FCC Part 15 Subpart C, intentional radiators test results for digital transmission systems (DTS)

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**Table 6.5-1: FCC 15.247 results for DTS**

Part	Test description	Verdict
§15.247(a)(2)	Minimum 6 dB bandwidth	Pass
§15.247(b)(3)	Maximum peak output power in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands	Pass
§15.247(d)	Spurious emissions	Pass
§15.247I	Power spectral density	Pass
§15.247(i)	Radiofrequency radiation exposure evaluation	Pass

## 6.6 ISED RSS-Gen, Issue 5, test results

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**Table 6.6-1: RSS-Gen results**

Part	Test description	Verdict
7.3	Receiver radiated emission limits	Not applicable
7.4	Receiver conducted emission limits	Not applicable
6.9	Operating bands and selection of test frequencies	Pass
8.8	AC power-line conducted emissions limits	Not applicable
RSS-102, 252	Exemption Limits for Routine Evaluation — RF Exposure Evaluation	Pass

Notes: <sup>1</sup> According to sections 5.2 and 5.3 of RSS-Gen, Issue 5 the EUT does not have a stand-alone receiver neither scanner receiver, therefore exempt from receiver requirements.

EUT is an DC powered device.

## 6.7 ISED RSS-247, Issue 2, test results for digital transmission systems (DTS)

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**Table 6.7-1: RSS-247 results for DTS**

Part	Test description	Verdict
5.2 (a)	Minimum 6 dB bandwidth	Pass
5.2 (b)	Maximum power spectral density	Pass
5.4	Transmitter output power and e.i.r.p. requirements	
5.4 (d)	Systems employing digital modulation techniques	Pass
5.4 (e)	Point-to-point systems in 2400–2483.5 MHz and 5725–5850 MHz band	Pass
5.5	Unwanted emissions	Pass

## Test equipment

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### 7.1 Test equipment list

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#### Section 7

**Table 7.1-1: Equipment list**

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
3 m EMI test chamber (Emissions)	TDK	SAC-3	FA002532e	2 year	February 25, 2022
Flush mount turntable	Sunol	FM2022	FA002550	—	NCR
Controller	Sunol	SC104V	FA002551	—	NCR
Antenna mast	Sunol	TLT2	FA002552	—	NCR
Receiver/spectrum analyzer	Rohde & Schwarz	ESU 40	FA002071	1 year	June 1, 2021
Spectrum analyzer	Rohde & Schwarz	FSV 40	FA002731	1 year	September 17, 2020
Power sensor	Rohde & Schwarz	NRP18S	FA002730	1 year	September 25, 2020
Bilog antenna (20–2000 MHz)	Sunol	JB1	FA002517	1 year	January 28, 2021
Horn antenna (1–18 GHz)	EMCO	3115	FA001451	1 year	October 12, 2020
Pre-amplifier (0.5–18 GHz)	Com-Power	PAM-118A	FA002561	1 year	September 18, 2020
3 Phase AC Power Source	apc AC Power	45 kVA	FA002677	—	VOU
2.4 GHz band Notch Filter	Microwave Circuits	N0324413	FA002693	—	VOU
50 Ω coax cable	C.C.A.	None	FA002603	—	VOU
50 Ω coax cable	C.C.A.	None	FA002605	—	VOU
50 Ω coax cable	C.C.A.	None	FA002831	—	VOU
True RMS Multimeter	Fluke	175	FA002642	1 year	November 22, 2020

Note: NCR - no calibration required, VOU - verify on use



## Testing data

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### 8.1 FCC 15.31(e) Variation of power source

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#### 8.1.8 References, definitions and limits

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For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage. For battery operated equipment, the equipment tests shall be performed using a new battery.

#### 8.1.2 Test summary

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Verdict	Pass	Test date	August 19, 2020
Tested by	Yong Huang		

#### 8.1.3 Observations, settings and special notes

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The testing was performed as per ANSI C63.10 Section 5.13.

- a) Where the device is intended to be powered from an external power adapter, the voltage variations shall be applied to the input of the adapter provided with the device at the time of sale. If the device is not marketed or sold with a specific adapter, then a typical power adapter shall be used.
- b) For devices, where operating at a supply voltage deviating  $\pm 15\%$  from the nominal rated value may cause damages or loss of intended function, test to minimum and maximum allowable voltage per manufacturer's specification and document in the report.
- c) For devices with wide range of rated supply voltage, test at 15% below the lowest and 15% above the highest declared nominal rated supply voltage.
- d) For devices obtaining power from an input/output (I/O) port (USB, firewire, etc.), a test jig is necessary to apply voltage variation to the device from a support power supply, while maintaining the functionalities of the device.

For battery-operated equipment, the equipment tests shall be performed using a variable power supply.

#### 8.1.4 Test data

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EUT Power requirements:

If EUT is an AC or a DC powered, was the noticeable output power variation observed?

AC       DC       Battery

YES       NO       N/A

If EUT is battery operated, was the testing performed using fresh batteries?

YES       NO       N/A

If EUT is rechargeable battery operated, was the testing performed using fully charged batteries?

YES       NO       N/A

## 8.2 FCC 15.31(m) and RSS-Gen 6.9 Number of frequencies

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### 8.2.1 References, definitions and limits

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**FCC:**

Measurements on intentional radiators or receivers shall be performed and, if required, reported for each band in which the device can be operated with the device operating at the number of frequencies in each band specified in the following table.

**ISED:**

Except where otherwise specified, measurements shall be performed for each frequency band of operation for which the radio apparatus is to be certified, with the device operating at the frequencies in each band of operation shown in table below. The frequencies selected for measurements shall be reported in the test report.

**Table 8.2-1: Frequency Range of Operation**

Frequency range over which the device operates (in each band)	Number of test frequencies required	Location of measurement frequency inside the operating frequency range
1 MHz or less	1	Center (middle of the band)
1–10 MHz	2	1 near high end, 1 near low end
Greater than 10 MHz	3	1 near high end, 1 near center and 1 near low end

Note: "near" means as close as possible to or at the centre / low end / high end of the frequency range over which the device operates.

### 8.2.2 Test summary

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Verdict	Pass		
Tested by	Yong Huang	Test date	August 19, 2020

### 8.2.3 Observations, settings and special notes

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**Per ANSI C63.10 Subclause 5.6.2.1:**

The number of channels tested can be reduced by measuring the center channel bandwidth first and then applying the following relaxations as appropriate:

- For each operating mode, if the measured channel bandwidth on the middle channel is at least 150% of the minimum permitted bandwidth, then it is not necessary to measure the bandwidth on the high and low channels.
- For multiple-input multiple-output (MIMO) systems, if the measured channel bandwidth on testing the middle channel exceeds the minimum permitted bandwidth by more than 50% on one transmit chain, then it is not necessary to repeat testing on the other chains.
- If the measured channel bandwidth on the middle channel is less than 50% of the maximum permitted bandwidth, then it is not necessary to measure the bandwidth on the high and low channels.

**Per ANSI C63.10 Subclause 5.6.2.2:**

For devices with multiple operating modes, measurements on the middle channel can be used to determine the worst-case mode(s). The worst-case modes are as follows:

- Band edge requirements—Measurements on the mode with the widest bandwidth can be used to cover the same channel (center frequency) on modes with narrower bandwidth that have the same or lower output power for each modulation family (e.g., OFDM and direct sequence spread spectrum).
- Spurious emissions—Measure the mode with the highest output power and the mode with the highest output power spectral density for each modulation family (e.g., OFDM and direct sequence spread spectrum).
- In-band PSD—Measurements on the mode with the narrowest bandwidth can be used to cover all modes within the same modulation family of an equal or lower output power provided the result is less than 50% of the limit.



8.2.4      Test data

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**Table 8.2-2: Test channels selection**

<b>Start of Frequency range, MHz</b>	<b>End of Frequency range, MHz</b>	<b>Frequency range bandwidth, MHz</b>	<b>Low channel, MHz</b>	<b>Mid channel, MHz</b>	<b>High channel, MHz</b>
2400	2483.5	83.5	2409.6	2439.6	2467.2

## 8.3 FCC 15.203 and RSS-Gen, section 6.8 Antenna requirement

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### 8.3.1 References, definitions and limits

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**FCC:**

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 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 §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.

**FCC 15.247(b)(4)**

The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

**ISED:**

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report.

### 8.3.2 Test summary

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Verdict	Pass
Tested by	Yong Huang

Test date

August 19, 2020

### 8.3.3 Observations, settings and special notes

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None

#### 8.3.4 Test data

Must the EUT be professionally installed?  YES  NO  
Does the EUT have detachable antenna(s)?  YES  NO  
If detachable, is the antenna connector(s) non-standard?  YES  NO  N/A

**Table 8.3-1: Antenna information**

Antenna type	Manufacturer	Model number	Maximum gain	Connector type
Dipole	Trilliant	CP-0299A (M antenna)	4.8 dBi	On board
Monopole	Linx	ANT-2.4uSP	3.8 dBi	Surface Mount
Dipole	Larsen	RO2406NM	6 dBi	Type-N Male
Monopole	MobileMark	IMAG5-2400	5 dBi	TNC Plug-RP
Dipole	L-Com	HG2403RD-RTF	3 dBi	TNC Plug-RP
Dipole	MobileMark	CVS-2400	2.5 dBi	SMA Plug-RP
Dipole	Molex	1461530100	3 dBi	u.fl

## 8.4 FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth for DTS systems

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### 8.4.1 References, definitions and limits

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**FCC:**

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.

**ISED:**

The minimum 6 dB bandwidth shall be 500 kHz.

**RSS-GEN, Section 6.7:**

6 dB bandwidth is defined as the frequency range between two points, one at the lowest frequency below and one at the highest frequency above the carrier frequency, at which the maximum power level of the transmitted emission is attenuated 6 dB below the maximum in-band power level of the modulated signal, where the two points are on the outskirts of the in-band emission.

For the 99% emission bandwidth, the trace data points are recovered and directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached, and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded. The difference between the two recorded frequencies is the occupied bandwidth (or the 99% emission bandwidth).

### 8.4.2 Test summary

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Verdict	Pass		
Tested by	Yong Huang	Test date	August 19, 2020

### 8.4.3 Observations, settings and special notes

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The test was performed as per KDB 558074, section 8.2 with reference to ANSI C63.10 subclause 11.8.

Spectrum analyser settings:

Resolution bandwidth	6 dB BW: 100 kHz; 99% OBW: 1–5% of OBW
Video bandwidth	$\geq 3 \times$ RBW
Frequency span	3 MHz
Detector mode	Peak
Trace mode	Max Hold

### 8.4.4 Test data

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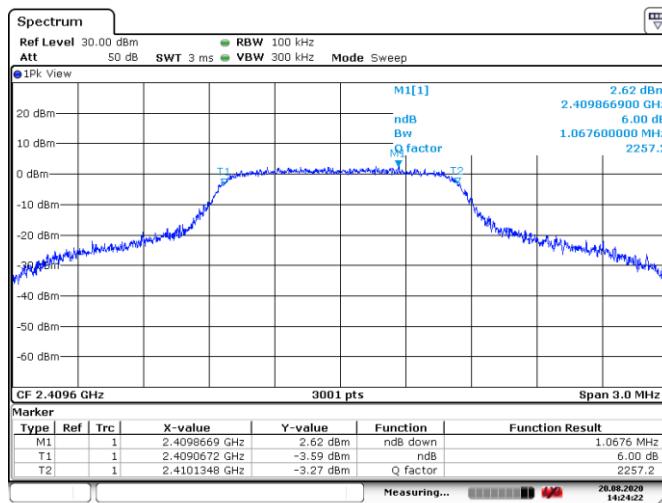
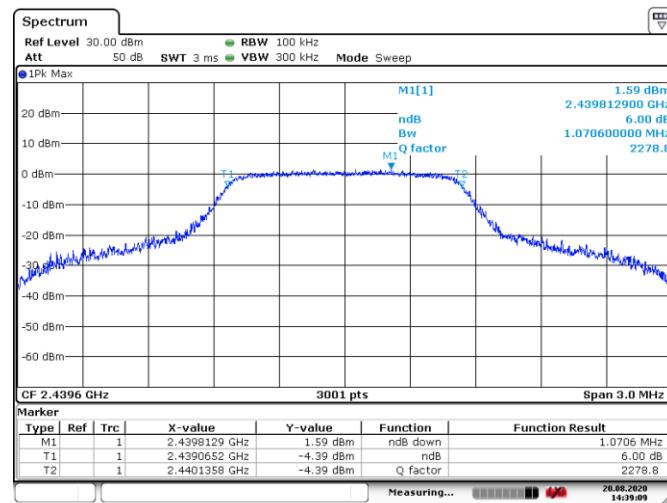
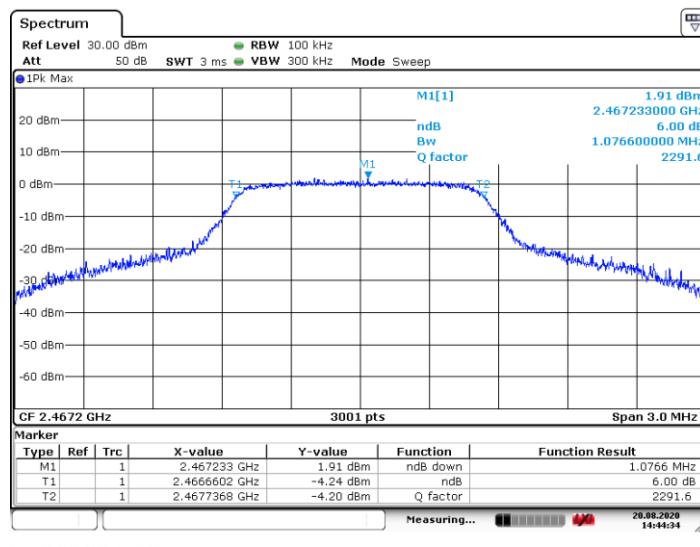
**Table 8.4-1: 99% occupied bandwidth results**

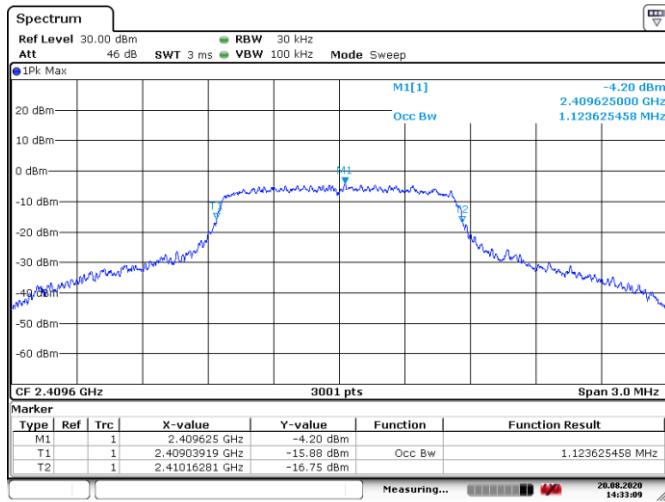
Frequency, MHz	99% occupied bandwidth, kHz
2409.6	1123.6
2439.6	1138.6
2467.2	1138.6

Note: there is no 99% occupied bandwidth limit in the standard's requirements, the measurement results provided for information purposes only.

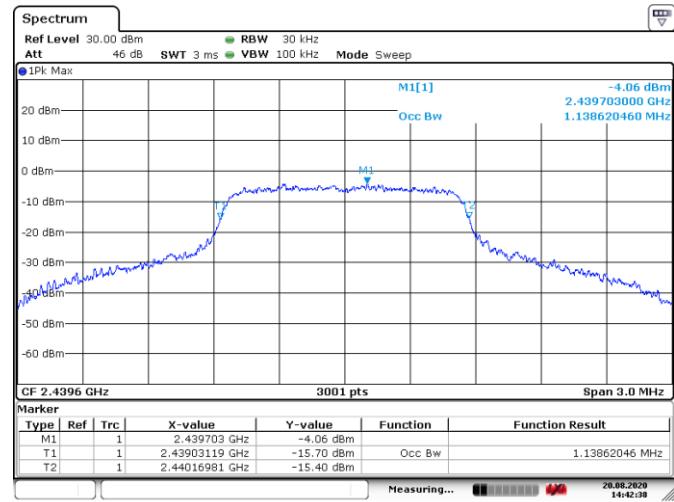
**Table 8.4-2: 6 dB bandwidth results**

Frequency, MHz	6 dB bandwidth, MHz	Minimum limit, MHz	Margin, MHz
2409.6	1.068	0.500	0.568
2439.6	1.071	0.500	0.571
2467.2	1.077	0.500	0.577

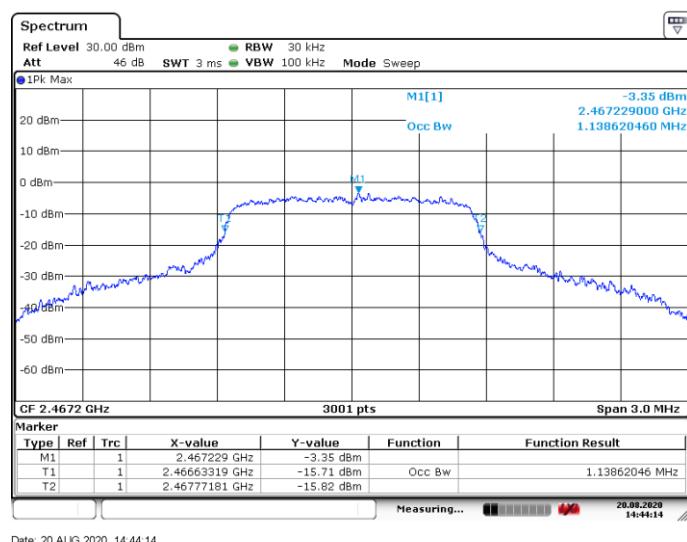

**Figure 8.4-1: 6 dB bandwidth on low channel**

**Figure 8.4-2: 6 dB bandwidth on mid channel**

**Figure 8.4-3: 6 dB bandwidth on high channel**



**Figure 8.4-4:** 99% occupied bandwidth on low channel



**Figure 8.4-5:** 99% occupied bandwidth on mid channel



**Figure 8.4-6:** 99% occupied bandwidth on high channel

## 8.5 FCC 15.247(b) and RSS-247 5.4(d) Transmitter output power and e.i.r.p. requirements for DTS in 2.4 GHz

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### 8.5.1 References, definitions and limits

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#### FCC:

(b) The maximum peak conducted output power of the intentional radiator shall not exceed the following:

- (3) For systems using digital modulation in the 2400–2483.5 MHz band: 1 W (30 dBm). As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.
- (4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

(c) Operation with directional antenna gains greater than 6 dBi.

(1) Fixed point-to-point operation:

- (i) Systems operating in the 2400–2483.5 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum conducted output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.
- (ii) Fixed, point-to-point operation, as used in paragraphs (c)(1)(i) and (c)(1)(ii) of this section, excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum or digitally modulated intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

(2) In addition to the provisions in paragraphs (b)(1), (b)(3), (b)(4) and (c)(1)(i) of this section, transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams, simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers provided the emissions comply with the following:

- (i) Different information must be transmitted to each receiver.
- (ii) If the transmitter employs an antenna system that emits multiple directional beams but does not do emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device, i.e., the sum of the power supplied to all antennas, antenna elements, staves, etc. and summed across all carriers or frequency channels, shall not exceed the limit specified in paragraph (b)(1) or (b)(3) of this section, as applicable. However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as follows:
  - (A) The directional gain shall be calculated as the sum of  $10 \log$  (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.
  - (B) A lower value for the directional gain than that calculated in paragraph (c)(2)(ii)(A) of this section will be accepted if sufficient evidence is presented, e.g., due to shading of the array or coherence loss in the beamforming.
- (iii) If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the power limit specified in paragraph (c)(2)(ii) of this section. If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the limit specified in paragraph (c)(2)(ii) of this section. In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the limit specified in paragraph (c)(2)(ii) of this section by more than 8 dB.
- (iv) Transmitters that emit a single directional beam shall operate under the provisions of paragraph (c)(1) of this section.



**ISED:**

d. For DTSs employing digital modulation techniques operating in the 2400–2483.5 MHz band, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

e. Fixed point-to-point systems in the 2400–2483.5 MHz band are permitted to have an e.i.r.p. higher than 4 W provided that the higher e.i.r.p. is achieved by employing higher gain directional antennas and not higher transmitter output powers. Point-to-multipoint systems, omnidirectional applications and multiple co-located transmitters transmitting the same information are prohibited from exceeding an e.i.r.p. of 4 W.

f. Transmitters operating in the band 2400–2483.5 MHz, may employ antenna systems that emit multiple directional beams simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers, provided that the emissions comply with the following:

i Different information must be transmitted to each receiver.

ii If the transmitter employs an antenna system that emits multiple directional beams, but does not emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device (i.e. the sum of the power supplied to all antennas, antenna elements, staves, etc., and summed across all carriers or frequency channels) shall not exceed the applicable output power limit specified in sections 5.4(b) and 5.4(d). However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as the sum of  $10 \log$  (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.

iii If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the applicable power limit specified in sections 5.4(b) and 5.4(d). If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the applicable limit specified in sections 5.4(b) and 5.4(d). In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the applicable limit specified in sections 5.4(b) and 5.4(d) by more than 8 dB.

iv Transmitters that transmit a single directional beam shall operate under the provisions of sections 5.4(b), 5.4(d) and 5.4(e).

#### 8.5.2 Test summary

Verdict	Pass		
Tested by	Yong Huang	Test date	August 19, 2020

#### 8.5.3 Observations, settings and special notes

The test was performed as per KDB 558074, section 8.3 with reference to ANSI C63.10 subclause 11.9.1 (peak power) using method  $RBW \geq DTS$  bandwidth (Maximum peak conducted output power) Spectrum analyser settings:

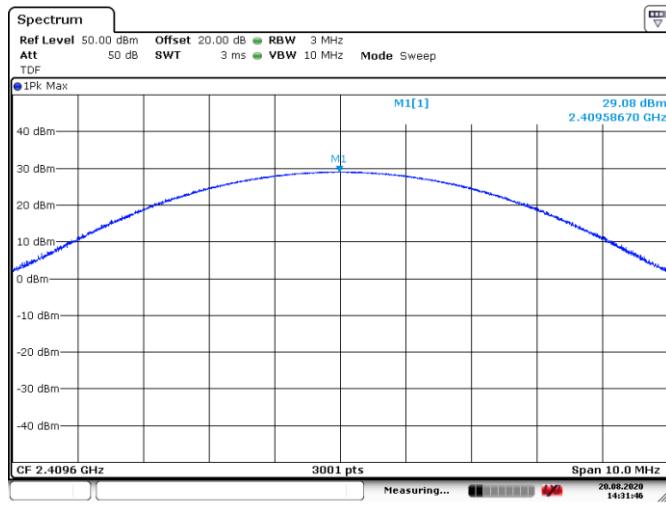
Resolution bandwidth	3 MHz
Video bandwidth	$\geq 3 \times RBW$
Frequency span	10 MHz
Detector mode	Peak
Trace mode	Maxhold

#### 8.5.4 Test data

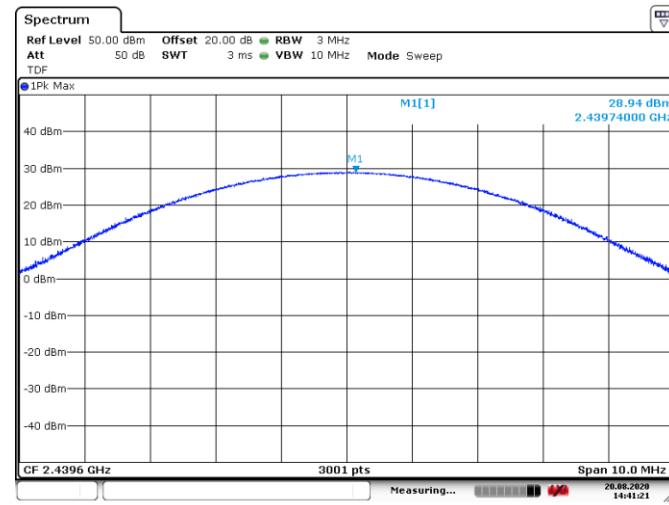
**Table 8.5-1: Output power and EIRP results (antenna port measurement)**

Frequency, MHz	Conducted output power, dBm	Output power limit, dBm	Output power margin, dB	Antenna gain, dBi	EIRP, dBm	EIRP limit, dBm	EIRP margin, dB
2409.6	29.1	30.0	0.9	6.0	35.1	36.0	0.9
2439.6	28.9	30.0	1.1	6.0	34.9	36.0	1.1
2467.2	29.0	30.0	1.1	6.0	35.0	36.0	1.1

Note: EIRP [dBm] = Conducted output power [dBm] + Antenna gain [dBi]



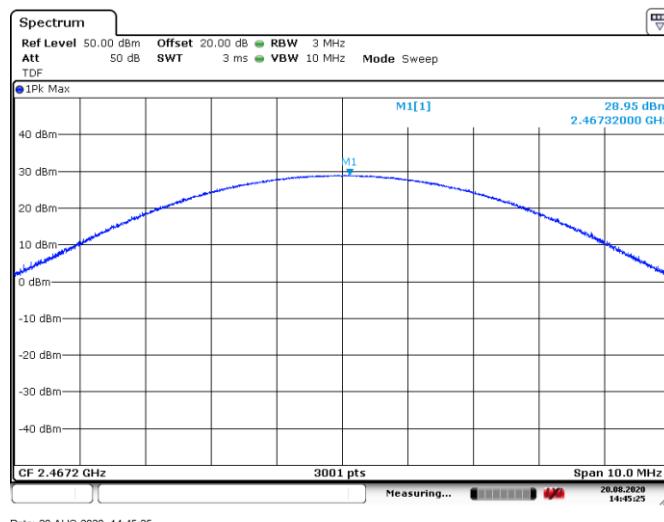
Date: 20 AUG 2020 14:31:47



Date: 20 AUG 2020 14:41:21

**Figure 8.5-1: Output power on low channel**

**Figure 8.5-2: Output power on mid channel**



Date: 20 AUG 2020 14:45:25

**Figure 8.5-3: Output power on high channel**

## 8.6 FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

### 8.6.1 References, definitions and limits

#### FCC:

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)).

#### ISED:

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 5.4(d), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

**Table 8.6-1: FCC §15.209 and RSS-Gen – Radiated emission limits**

Frequency, MHz	Field strength of emissions		Measurement distance, m
	µV/m	dBµV/m	
0.009–0.490	2400/F	67.6 – 20 × log <sub>10</sub> (F)	300
0.490–1.705	24000/F	87.6 – 20 × log <sub>10</sub> (F)	30
1.705–30.0	30	29.5	30
30–88	100	40.0	3
88–216	150	43.5	3
216–960	200	46.0	3
above 960	500	54.0	3

Notes: In the emission table above, the tighter limit applies at the band edges.

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test



**Table 8.6-2: ISED restricted frequency bands**

MHz	MHz	MHz	GHz
0.090–0.110	12.57675–12.57725	399.9–410	7.25–7.75
0.495–0.505	13.36–13.41	608–614	8.025–8.5
2.1735–2.1905	16.42–16.423	960–1427	9.0–9.2
3.020–3.026	16.69475–16.69525	1435–1626.5	9.3–9.5
4.125–4.128	16.80425–16.80475	1645.5–1646.5	10.6–12.7
4.17725–4.17775	25.5–25.67	1660–1710	13.25–13.4
4.20725–4.20775	37.5–38.25	1718.8–1722.2	14.47–14.5
5.677–5.683	73–74.6	2200–2300	15.35–16.2
6.215–6.218	74.8–75.2	2310–2390	17.7–21.4
6.26775–6.26825	108–138	2483.5–2500	22.01–23.12
6.31175–6.31225	149.9–150.05	2655–2900	23.6–24.0
8.291–8.294	156.52475–156.52525	3260–3267	31.2–31.8
8.362–8.366	156.7–156.9	3332–3339	36.43–36.5
8.37625–8.38675	162.0125–167.17	3345.8–3358	
8.41425–8.41475	167.72–173.2	3500–4400	
12.29–12.293	240–285	4500–5150	Above 38.6
12.51975–12.52025	322–335.4	5350–5460	

Note: Certain frequency bands listed in Table 8.6-2 and above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

**Table 8.6-3: FCC restricted frequency bands**

MHz	MHz	MHz	GHz
0.090–0.110	16.42–16.423	399.9–410	4.5–5.15
0.495–0.505	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225	123–138	2200–2300	14.47–14.5
8.291–8.294	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675	156.7–156.9	2690–2900	22.01–23.12
8.41425–8.41475	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025	240–285	3345.8–3358	36.43–36.5
12.57675–12.57725	322–335.4	3600–4400	Above 38.6
13.36–13.41			

## 8.6.2 Test summary

Verdict	Pass		
Tested by	Yong Huang	Test date	August 19, 2020

### 8.6.3 Observations, settings and special notes

As part of the current assessment, the test range of 9 kHz to 10<sup>th</sup> harmonic has been fully considered and compared to the actual frequencies utilized within the EUT. Since the EUT contains a transmitter in the GHz range, the EUT has been deemed compliant without formal testing in the 9 kHz to 30 MHz test range, therefore formal test results (tabular data and/or plots) are not provided within this test report.

EUT was set to transmit with duty cycle no less than 98 %.

Radiated measurements were performed at a distance of 3 m.

DTS emissions in non-restricted frequency bands test was performed as per KDB 558074, section 8.5 with reference to ANSI C63.10 subclause 11.11.

Since fundamental power was tested using the maximum peak conducted output power procedure to demonstrate compliance, the spurious emissions limit is -20 dBc/100 kHz.

DTS emissions in restricted frequency bands test was performed as per KDB 558074, section 8.6 with reference to ANSI C63.10 subclause 11.12.

DTS band-edge emission measurements test was performed as per KDB 558074, section 8.7 with reference to ANSI C63.10 subclause 11.13.

Spectrum analyser settings for radiated measurements within restricted bands below 1 GHz:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for peak radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	3 MHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for average radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	10 Hz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for conducted spurious emissions measurements:

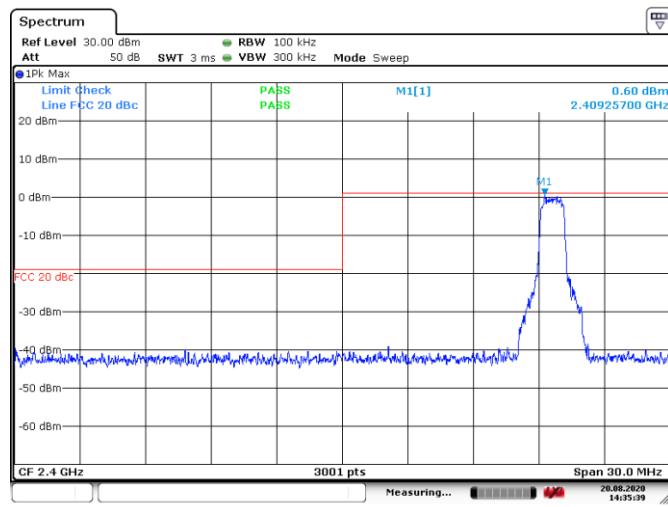
Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

Limits are calculated as:

54 dB $\mu$ V/m - 95.23 = -41.23 dBm for average limit

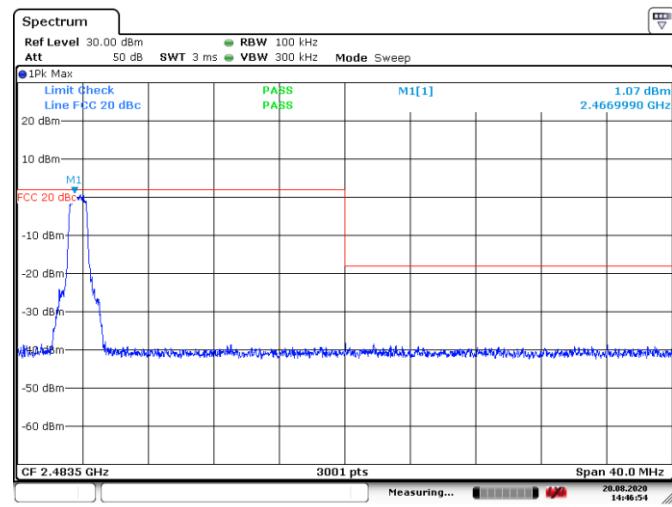
74 dB $\mu$ V/m - 95.23 = -21.23 dBm for peak limit

#### 8.6.4 Test data



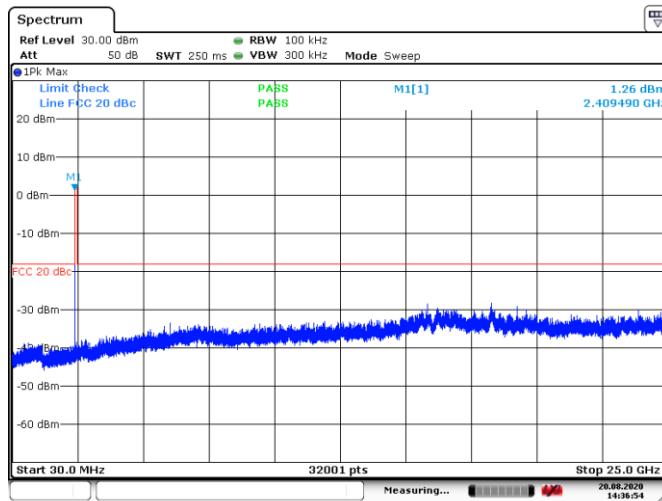
Date: 20 AUG 2020 14:35:39

**Figure 8.6-1:** Band edge spurious emissions at 2400 MHz



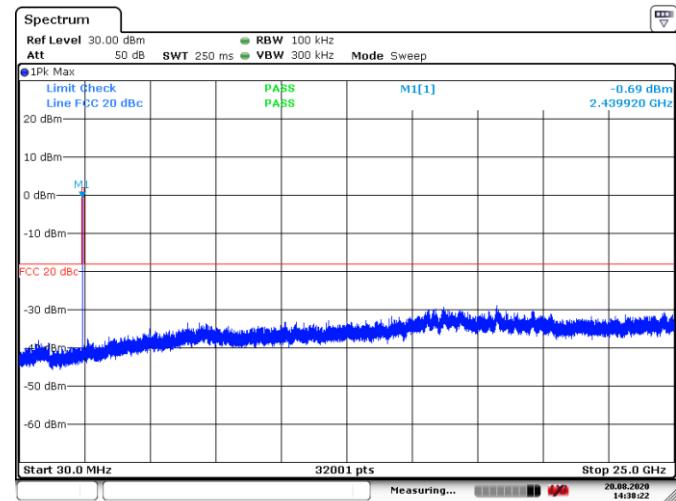
Date: 20 AUG 2020 14:46:54

**Figure 8.6-2:** Band edge spurious emissions at 2483.5 MHz



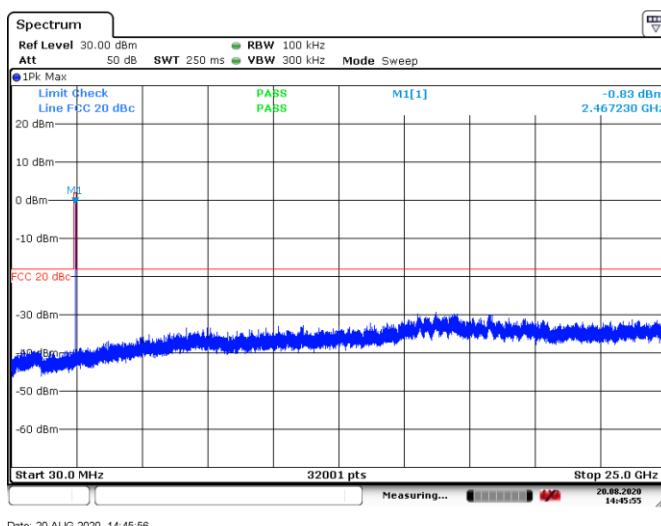
Date: 20 AUG 2020 14:36:53

**Figure 8.6-3: Conducted spurious emissions, tx on low channel**



Date: 20 AUG 2020 14:38:22

**Figure 8.6-4: Conducted spurious emissions, tx on mid channel**



Date: 20 AUG 2020 14:45:56

**Figure 8.6-5: Conducted spurious emissions, tx on high channel**

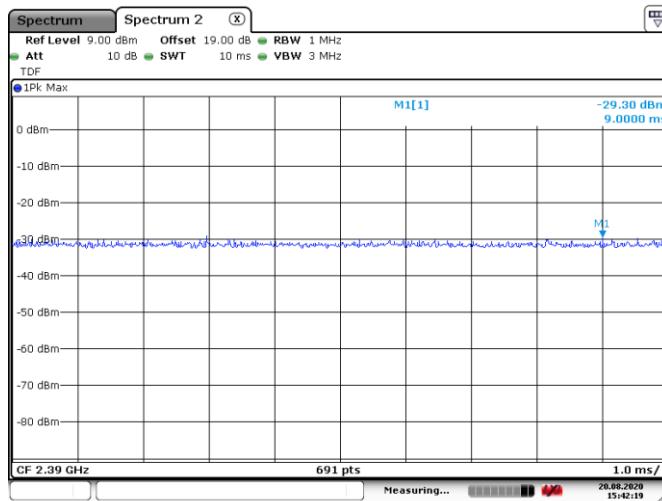


Figure 8.6-6: Conducted spurious emissions on 2390 MHz, peak

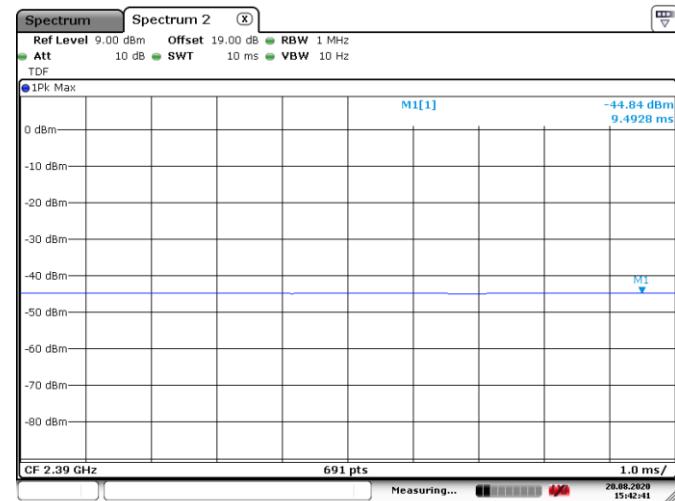


Figure 8.6-7: Conducted spurious emissions on 2390 MHz, average

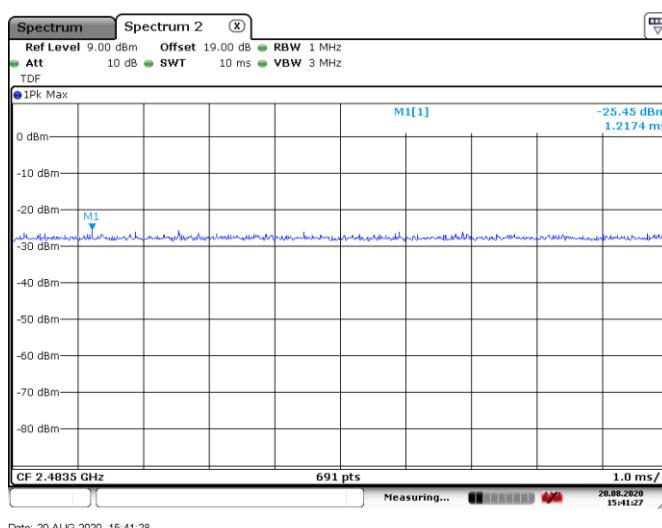


Figure 8.6-8: Conducted spurious emissions on 2483.5MHz, peak

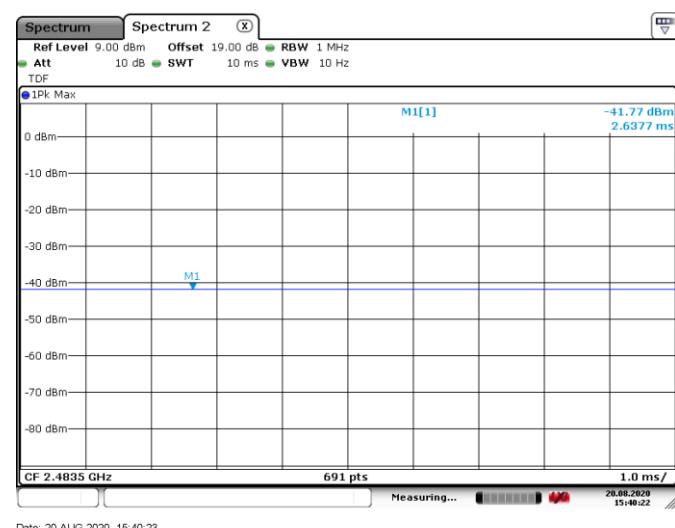
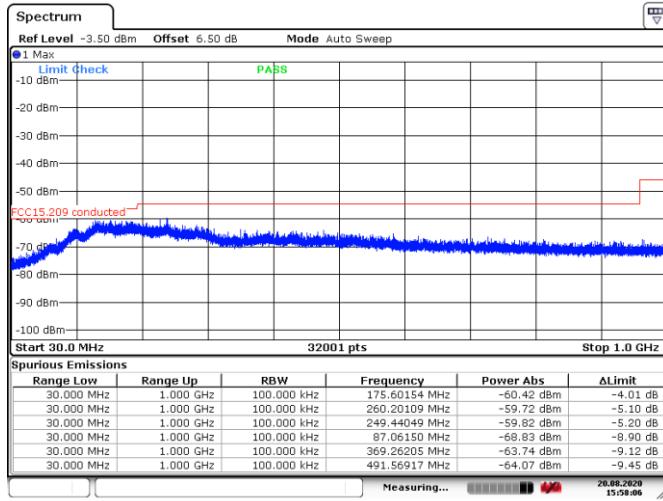


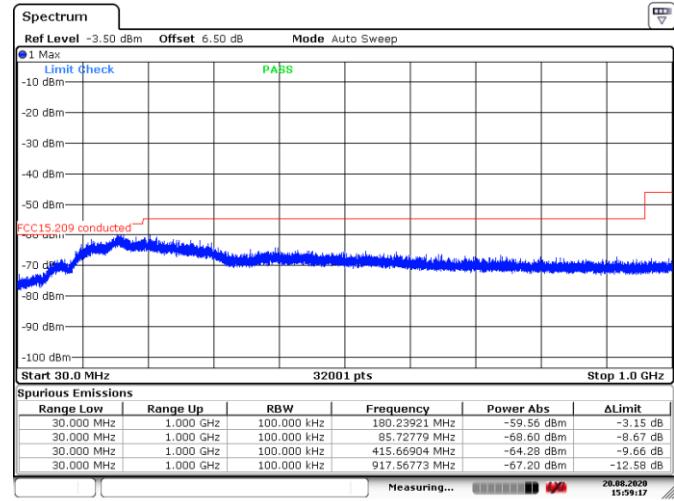
Figure 8.6-9: Conducted spurious emissions on 2483.5MHz, average

Note: In the plots above, antenna gain of 6 dBi has been included in reference offset.  
 Within restricted bands, peak limit is -21.23 dBm , average limit is -41.23 dBm



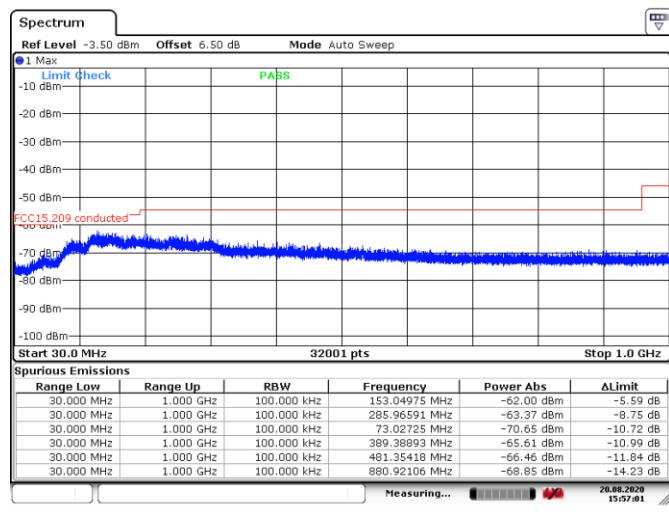
Date: 20 AUG 2020 15:58:06

**Figure 8.6-10:** Conducted spurious emissions 30 MHz to 1 GHz within restricted bands, tx on low channel



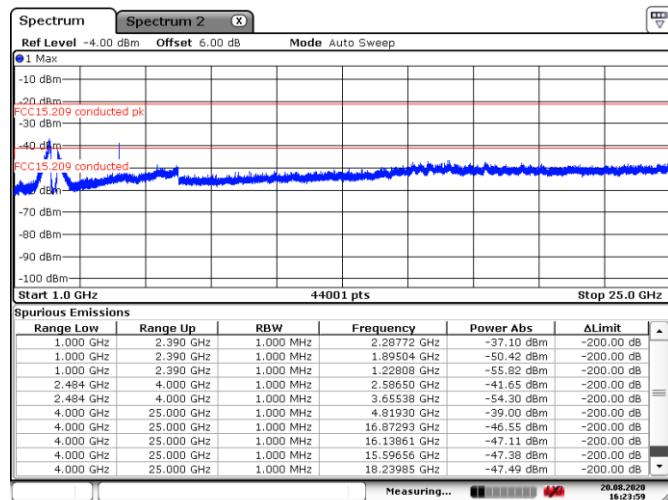
Date: 20 AUG 2020 15:59:17

**Figure 8.6-11:** Conducted spurious emissions 30 MHz to 1 GHz within restricted bands, tx on mid channel



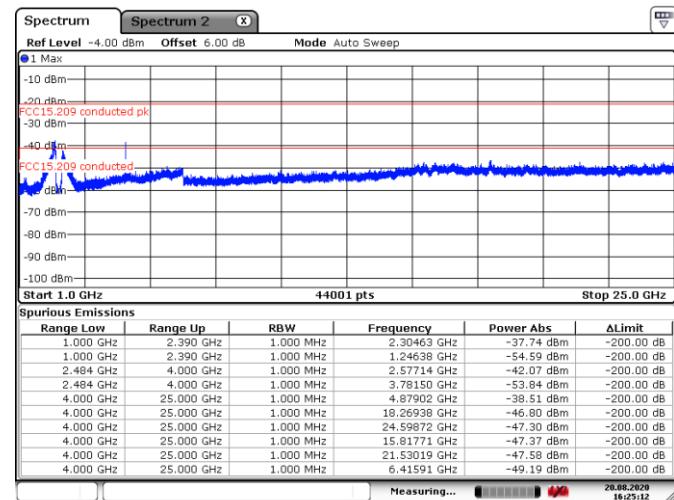
**Figure 8.6-12:** Conducted spurious emissions 30 MHz to 1 GHz within restricted bands, tx on high channel

Note: In the plots above, antenna gain of 6 dBi has been included in reference offset.  
 Within restricted bands, peak limit is -21.23 dBm, average limit is -41.23 dBm, calculation as below



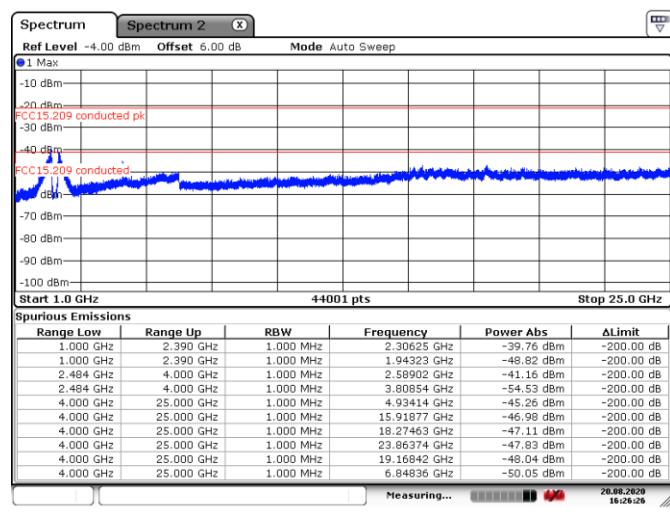
Date: 20 AUG 2020 16:23:58

**Figure 8.6-13:** Conducted spurious emissions above 1 GHz within restricted bands, tx on low channel



Date: 20 AUG 2020 16:25:12

**Figure 8.6-14:** Conducted spurious emissions above 1 GHz within restricted bands, tx on mid channel



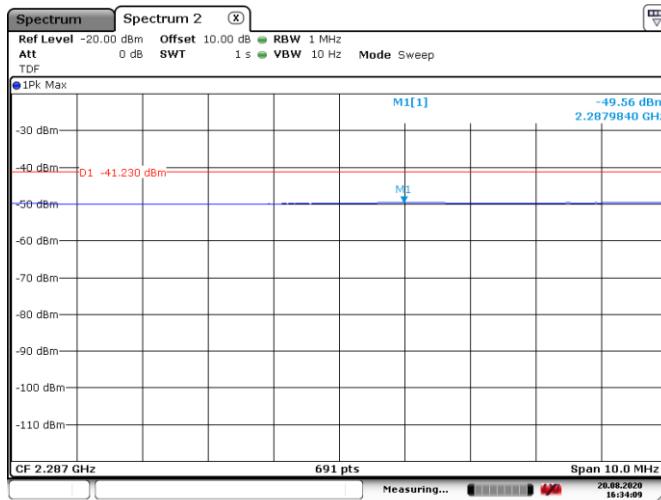
Date: 20 AUG 2020 16:26:26

**Figure 8.6-15:** Conducted spurious emissions above 1 GHz within restricted bands, tx on high channel

Note: In the plots above, antenna gain of 6 dBi has been included in reference offset.

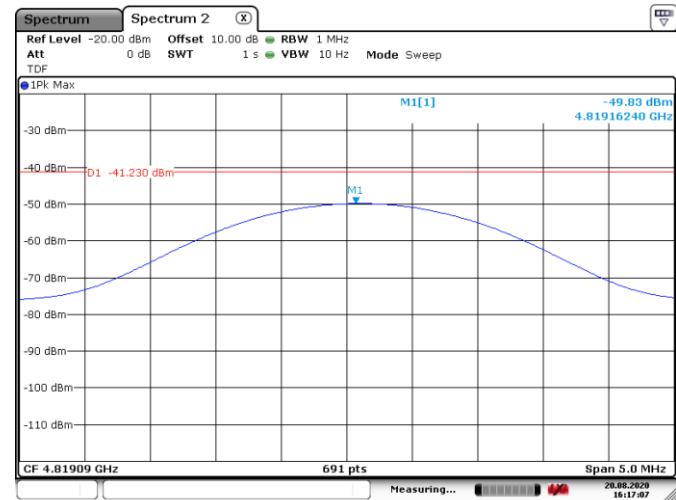
Within restricted bands, peak limit is -21.23 dBm, average limit is -41.23 dBm

At the frequency that the peak readings are over average limit, average readings are taken in the following.



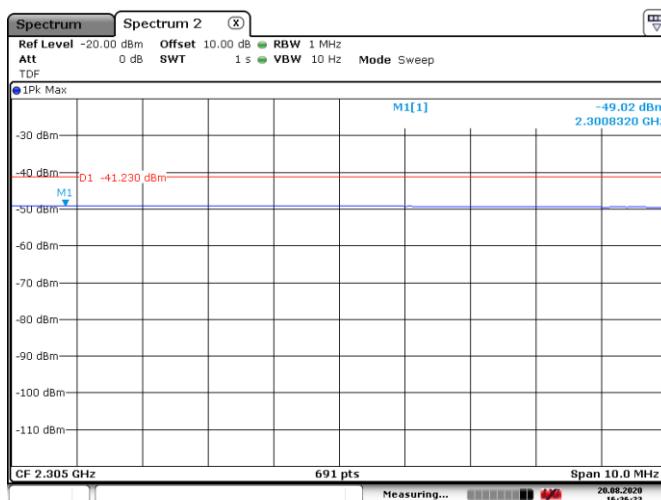
Date: 20 AUG 2020 16:34:09

**Figure 8.6-16: Conducted spurious emissions, tx on low channel**



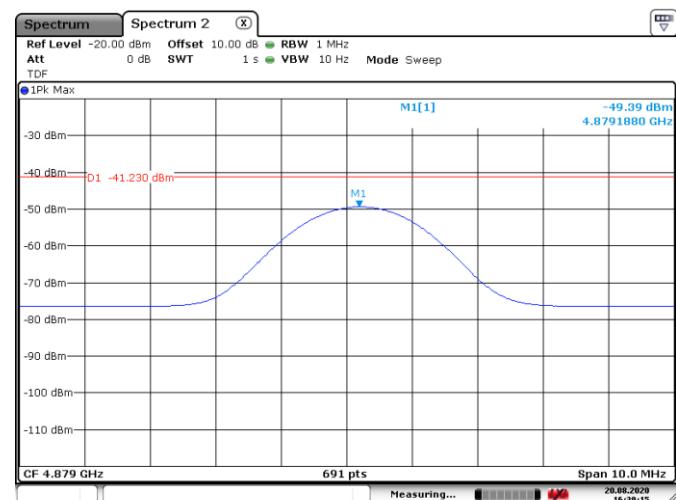
Date: 20 AUG 2020 16:17:07

**Figure 8.6-17: Conducted spurious emissions, tx on low channel**



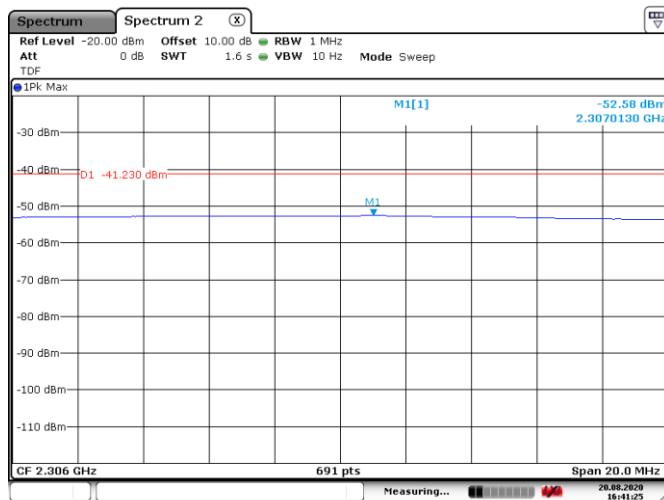
Date: 20 AUG 2020 16:36:23

**Figure 8.6-18: Conducted spurious emissions, tx on mid channel**



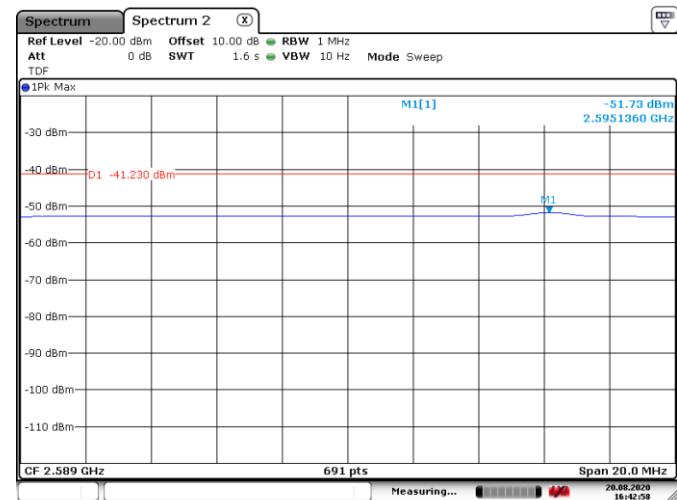
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**Figure 8.6-19: Conducted spurious emissions, tx on mid channel**



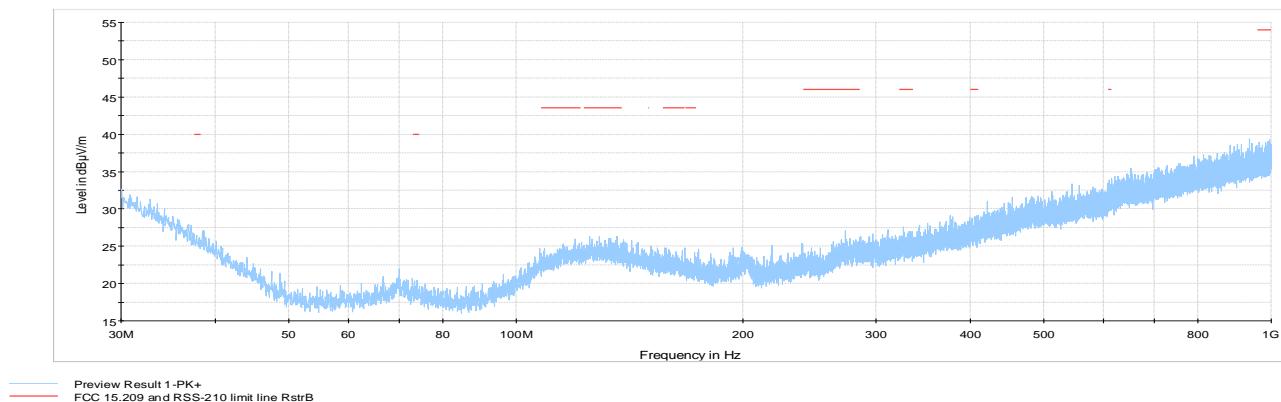
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**Figure 8.6-20:** Conducted spurious emissions, tx on mid channel

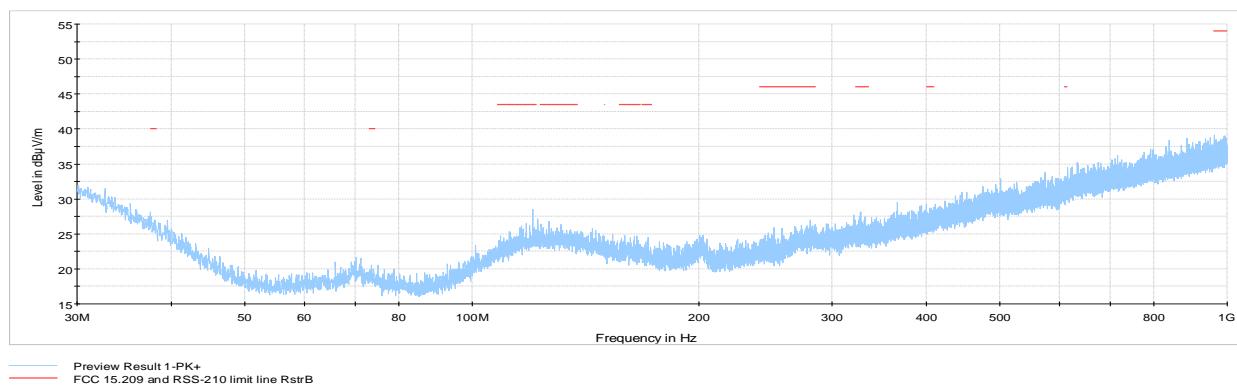


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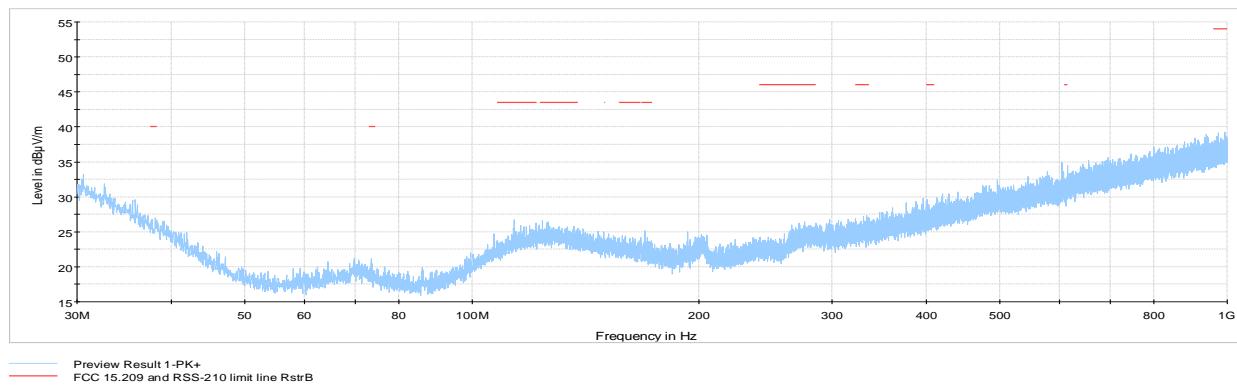
**Figure 8.6-21:** Conducted spurious emissions, tx on mid channel



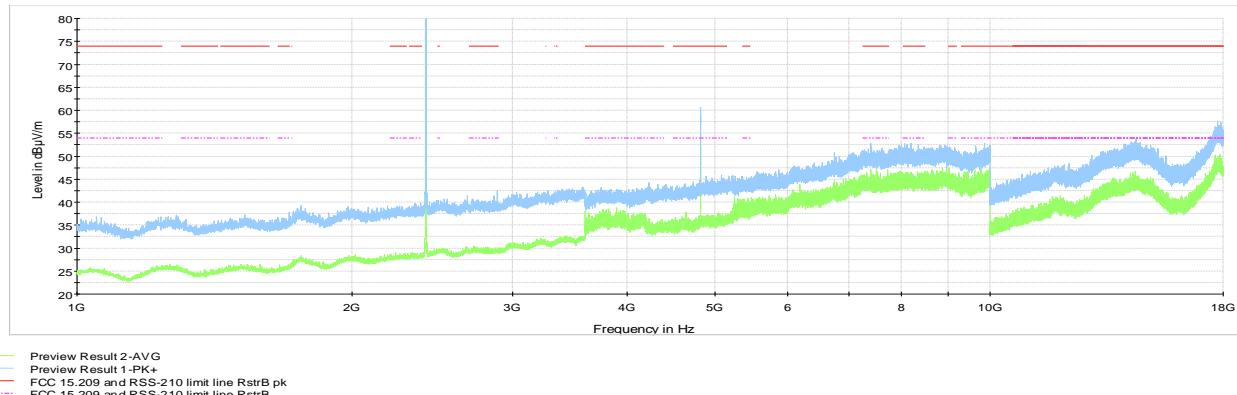
**Figure 8.6-22: Cabinet radiated Spurious emissions within 30 to 1000 MHz, Tx @ low channel**



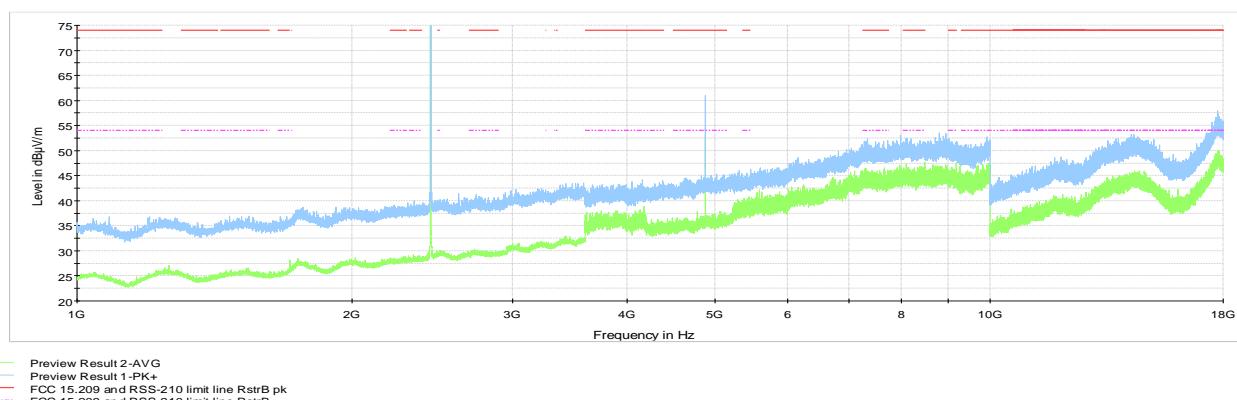
**Figure 8.6-23: Cabinet radiated Spurious emissions within 30 to 1000 MHz, Tx @ mid channel**



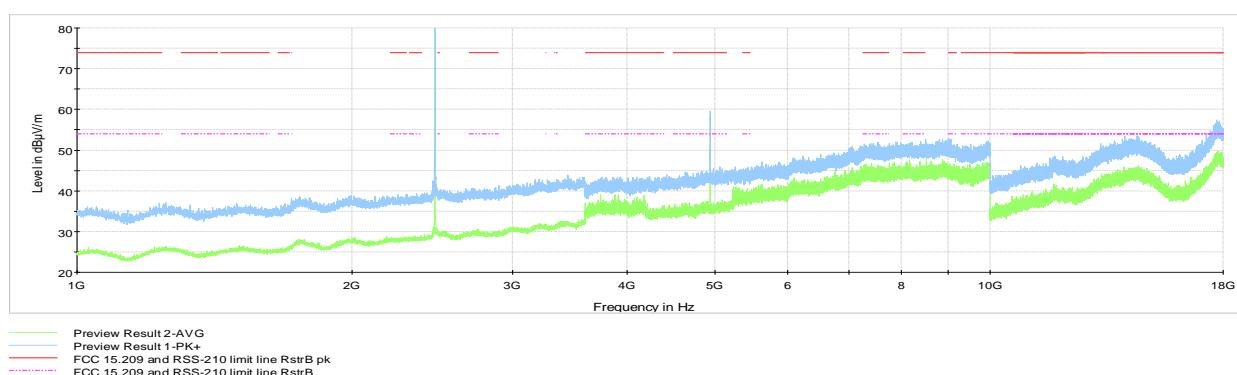
#### 8.6.4 Test data – continued



**Figure 8.6-25: Cabinet radiated Spurious emissions 1to18 GHz, Tx @ low channel**



**Figure 8.6-26: Cabinet radiated Spurious emissions 1to18 GHz, Tx @ mid channel**



Note: Emissions at 2405 MHz and 2475 MHz are intentional transmissions. No emissions were detected above 18 GHz



**Section 8**      *Testing data*  
**Test name**      *FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions*  
**Specification**      *FCC Part 15 Subpart C and RSS-247, Issue 2*

**Table 8.6-4: Cabinet Radiated field strength measurement results**

Channel	Frequency, MHz	Peak Field strength, dB $\mu$ V/m		Margin, dB	Average Field strength, dB $\mu$ V/m		Margin, dB
		Measured	Limit		Measured	Limit	
Low	4819.8	60.6	74.0	13.4	51.9	54.0	2.1
Mid	4879.4	61.0	74.0	13.0	53.1	54.0	0.9
High	4934.9	59.5	74.0	14.5	51.2	54.0	2.8

*Note: Field strength includes correction factor of antenna, cable loss, amplifier, and attenuators where applicable.*

## 8.7 FCC 15.247(e) and RSS-247 5.2(b) Power spectral density for digitally modulated devices

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### 8.7.1 References, definitions and limits

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**FCC:**

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. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

(f) For the purposes of this section, hybrid systems are those that employ a combination of both frequency hopping and digital modulation techniques. The frequency hopping operation of the hybrid system, with the direct sequence or digital modulation operation turned-off, shall have an average time of occupancy on any frequency not to exceed 0.4 seconds within a time period in seconds equal to the number of hopping frequencies employed multiplied by 0.4. The power spectral density conducted from the intentional radiator to the antenna due to the digital modulation operation of the hybrid system, with the frequency hopping operation turned off, shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

**ISED:**

The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

### 8.7.2 Test summary

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Verdict	Pass	Test date	August 19, 2020
Tested by	Yong Huang		

### 8.7.3 Observations, settings and special notes

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Power spectral density test was performed as per KDB 558074, section 8.4 with reference to ANSI C63.10 subclause 11.10. The test was performed using method PKPSD (peak PSD). Spectrum analyser settings:

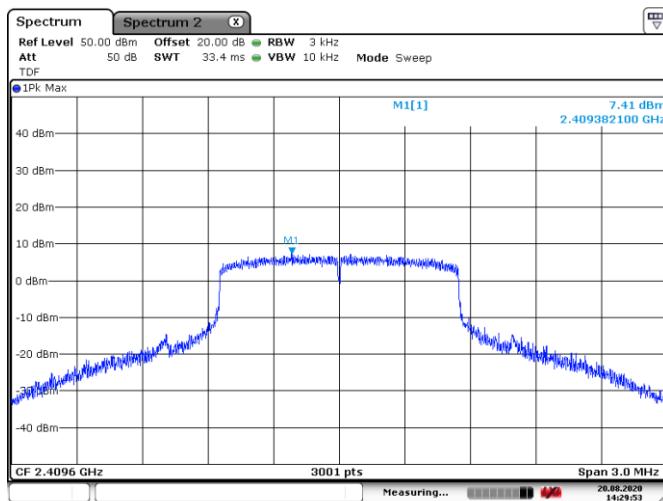
Resolution bandwidth:	3 kHz $\leq$ RBW $\leq$ 100 kHz
Video bandwidth:	$\geq$ 3 $\times$ RBW
Frequency span:	3 MHz
Detector mode:	Peak
Trace mode:	Maxhold

### 8.7.4 Test data

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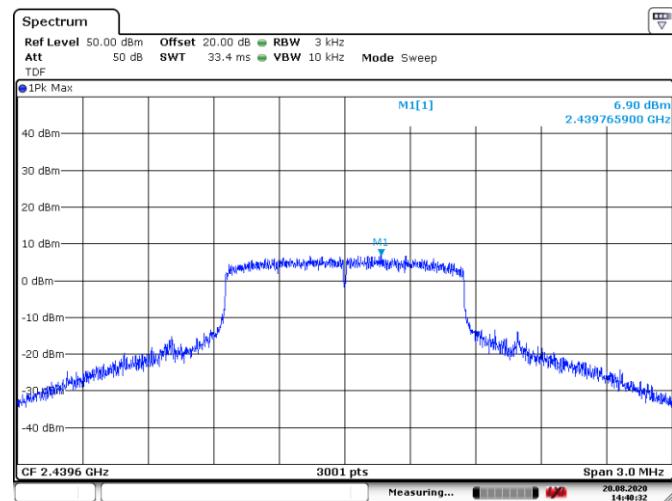
**Table 8.7-1: PSD results (antenna port measurement)**

Frequency, MHz	PSD, dBm/3 kHz	PSD limit, dBm/3 kHz	Margin, dB
2409.6	7.4	8.0	0.6
2439.6	6.9	8.0	1.1
2467.2	6.7	8.0	1.3



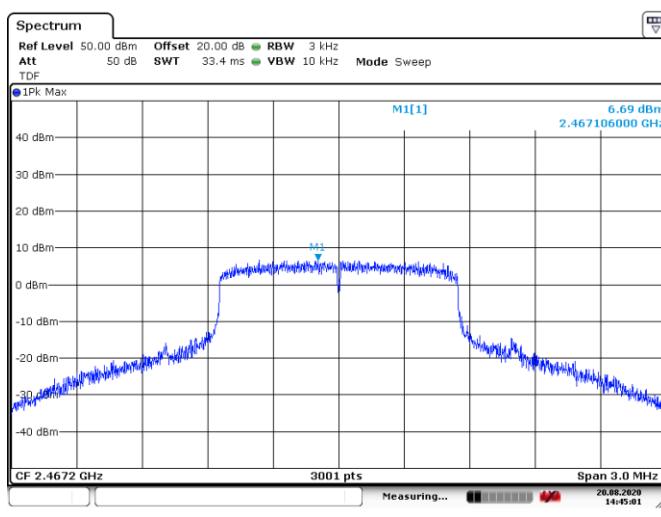
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**Figure 8.7-1: PSD on low channel**



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**Figure 8.7-2: PSD on mid channel**



Date: 20 AUG 2020 14:45:02

**Figure 8.7-3: PSD on high channel**

## EUT photos

## 9.1 External photos

Section 9



Figure 9.1-1: Front view photo



Figure 9.1-2: Back view photo



Figure 9.1-3: Side view photo

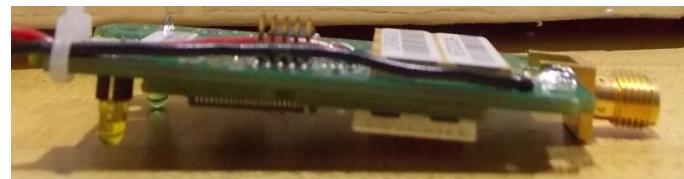


Figure 9.1-4: Side view photo



Figure 9.1-5: Top view photo



Figure 9.1-6: Bottom view photo

End of the test report