



Engineering Solutions & Electromagnetic Compatibility Services

**FCC Part 15.231 & IC RSS-210 Certification Application Report**

| Test Lab:   |   | Applicant:  |                     |
|---|---|---|---------------------|
| Rhein Tech Laboratories, Inc. Tel: 703-689-0368<br>360 Herndon Parkway Fax: 703-689-2056<br>Suite 1400 Web: <a href="http://www.rheintech.com">www.rheintech.com</a><br>Herndon, VA 20170 |   | Safety Technology International, Inc. (STI)<br>2306 Airport Road<br>Waterford, MI 48327<br>Contact: John Taylor |                     |
| FCC ID<br>IC ID   | TXL34072<br>6335A-34072   | Test Report Date  | July 26, 2012       |
| Platform  | N/A   | RTL Work Order Number   | 2012204             |
| Model   | 34072   | RTL Quote Number  | QRTL12-204          |
| FCC Classification  | DSC – Part 15 Security/Remote Control Transmitter   |   |                     |
| FCC Rule Part(s)  | Part 15.231: Periodic operation in the band 40.66 – 40.70 MHz and above 70 MHz (10-01-11)   |   |                     |
| IC Standard   | RSS-210 Issue 8: Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment |   |                     |
| Procedure or Other Guidance   | ANSI C63.4-2003 Standard for Methods of Measurement of Radio-Noise Emissions                |   |                     |
| Digital Interface Information   | N/A   |   |                     |
| Frequency Range (MHz)   | Output Power (W)  | Frequency Tolerance   | Emission Designator |
| 433.92  | N/A   | N/A   | 72K9P1D             |

I, the undersigned, hereby declare that the equipment tested and referenced in this report conforms to the identified standard(s) as described in this test report. Modifications made to the equipment during testing in order to achieve compliance with these standards are listed in the report. Furthermore, there was no deviation from, additions to, or exclusions from the applicable parts of FCC Part 2, FCC Part 15, IC RSS-210 and ANSI C63.4.

Signature: 

Date: July 26, 2012

Typed/Printed Name: Desmond A. Fraser

Position: President

*This report may not be reproduced, except in full, without the written approval of Rhein Tech Laboratories, Inc. and Safety Technology International, Inc. The test results reported relate only to the item tested.*

*These tests are accredited and meet the requirements of ISO/IEC 17025 as verified by ANSI-ASQ National Accreditation Board/ACCLASS. Refer to certificate and scope of accreditation AT-1445.*

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Rhein Tech Laboratories, Inc.  
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<http://www.rheintech.com>

Client: STI  
Model: 34072  
Standards: FCC 15.231/IC RSS-210  
ID's: TXL34072/6335A-34072  
Report #: 2012204

## **1 General Information**

### **1.1 Scope**

FCC Rules Part 15.231: Periodic operation in the band 40.66–40.70 MHz and above 70 MHz (Part 15.231(b) limits).

IC RSS-210 Issue 8: Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment

### **1.2 Modifications**

N/A

### **1.3 Test Facility**

The open area test site and conducted measurement facility used to collect the radiated data is located at Rhein Tech Laboratories, Inc. (RTL), 360 Herndon Parkway, Suite 1400, Herndon, Virginia 20170. This site has been fully described in a report and approved by the Federal Communications Commission to perform AC line conducted and radiated emissions testing (ANSI C63.4 2003).

### **1.4 Related Submittal(s)/Grant(s)**

This is an original certification application for Safety Technology International, Inc. Model 34072, FCC ID: TXL34072, IC: 6335A-34072.

## 2 Test Information

### 2.1 Test Justification

The EUT was tested in all three orthogonal planes in order to determine worst-case emissions. The EUT's frequencies were tested and investigated from 9 kHz to the 10<sup>th</sup> harmonic. The test results relate only to the item that was tested.

The antenna transmits, receives, and is internal. The IF, LO, and up to the 2<sup>nd</sup> LO, were investigated and tested, and found to be compliant for unintentional emissions compliance.

### 2.2 Exercising the EUT

The EUT was adapted to continuously transmit for testing purposes. The carrier was also checked to verify that the information was being transmitted. The unit was reprogrammed for normal operation for the duty cycle and timing plots. Note that the EUT is a manually activated transmitter.

There were no deviations from the test standard(s) and/or methods.

### 2.3 Test Result Summary

**Table 2-1: Test Result Summary**

| FCC           | IC             | Test                   | Pass/Fail Or N/A |
|---------------|----------------|------------------------|------------------|
| FCC 15.207    | RSS-Gen 7.2.4  | AC Conducted Emissions | N/A              |
| FCC 15.231(a) | RSS-210 A1.1.1 | Timing Requirements    | Pass             |
| FCC 15.231(b) | RSS-210 A1.1.2 | Radiated Emissions     | Pass             |
| FCC 15.231(c) | N/A            | 20 dB Bandwidth        | Pass             |
| N/A           | RSS-210 A1.1.3 | 99% Bandwidth          | Pass             |

### 2.4 Test System Details

The test samples were received on July 16, 2012. The FCC Identifiers for all equipment, plus descriptions of all cables used in the tested system, are shown in the following table.

**Table 2-2: Equipment Under Test (EUT)**

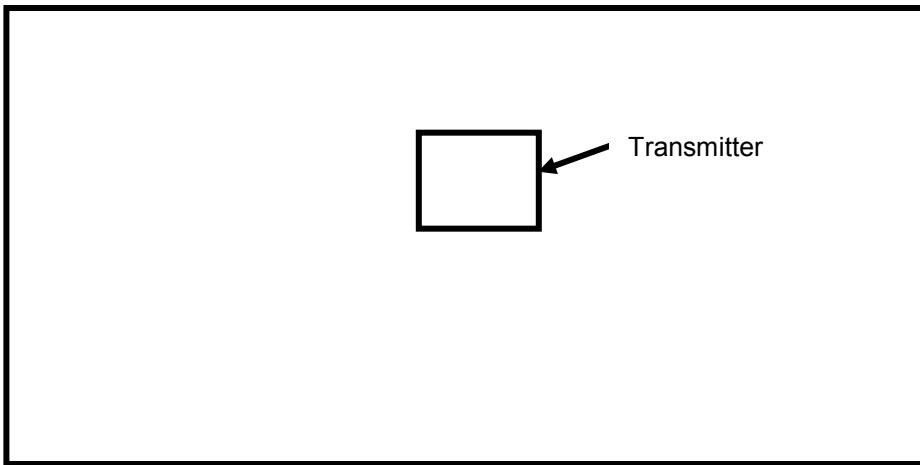
| Part                     | Manufacturer                          | Model | Serial Number | FCC ID   | Cable Description | RTL Bar Code |
|--------------------------|---------------------------------------|-------|---------------|----------|-------------------|--------------|
| STI Extinguisher Stopper | Safety Technology International, Inc. | 34072 | N/A           | TXL34072 | N/A               | 20350        |

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Report #: 2012204

## 2.5 Configuration of Tested System

**Figure 2-1: Worst Case Configuration of System under Test**

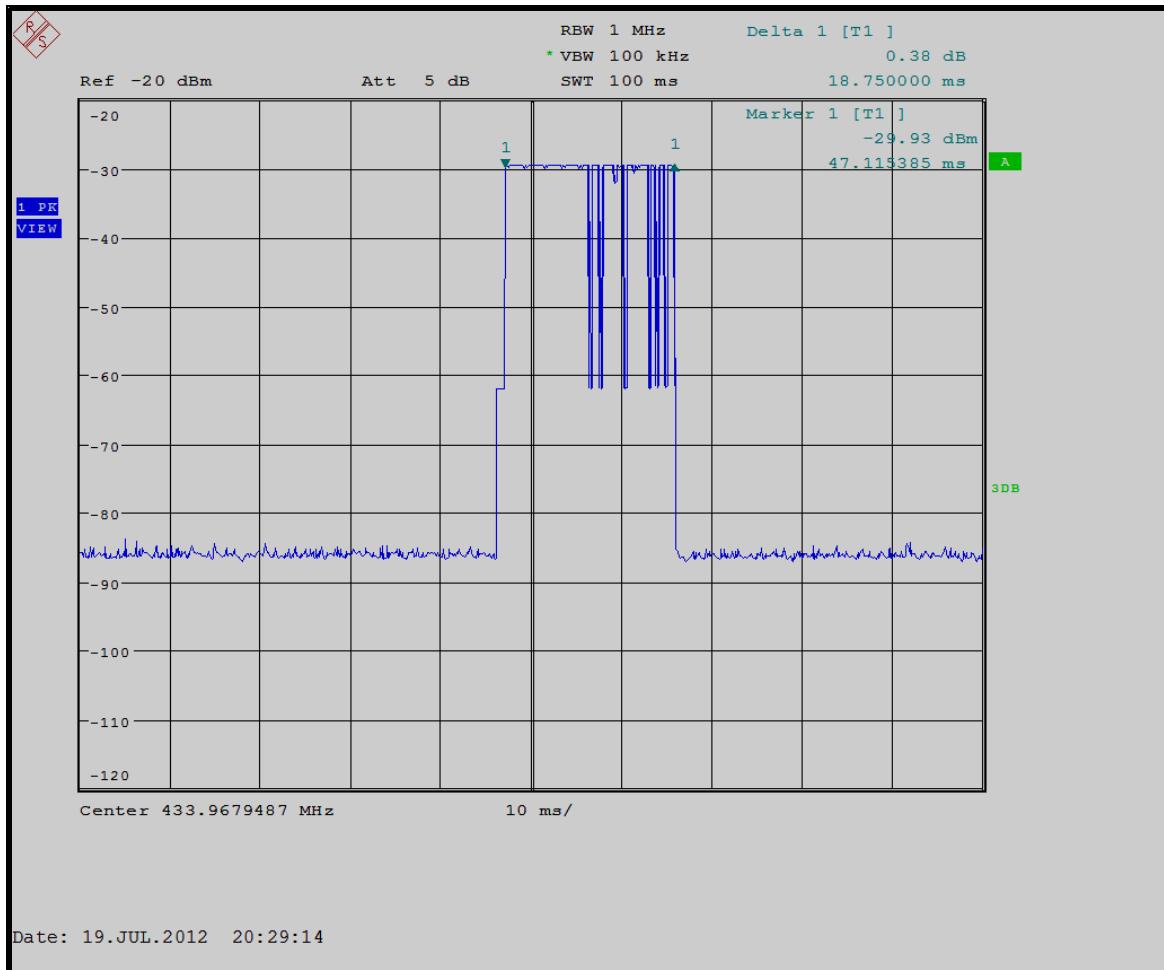


### 3 Duty Cycle Calculation - FCC 15.35(c)

A worst-case standard transmission in 100 ms consists of a “Transmit on-time” of 18 msec, when measured in a 100 msec window, consisting of one packet. Each packet is composed of 64 bits of 150 us each or 9.6 ms/100 ms window.

$$20 \log (9.6/100) = -20.4 \text{ dB}$$

**Plot 3-1: Transmit On in 100 ms Window**



**Table 3-1: Duty Cycle Test Equipment**

| RTL Asset # | Manufacturer    | Model        | Part Type                              | Serial Number | Calibration Due Date |
|-------------|-----------------|--------------|--|---------------|----------------------|
| 901581      | Rohde & Schwarz | 1166.1660.50 | FSU Spectrum Analyzer (20 Hz – 50 GHz) | 200106        | 01/19/2013           |

Rhein Tech Laboratories, Inc.  
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ID's: TXL34072/6335A-34072  
Report #: 2012204

**Test Personnel:**

---

Jon Wilson  
Test Engineer

  
Signature

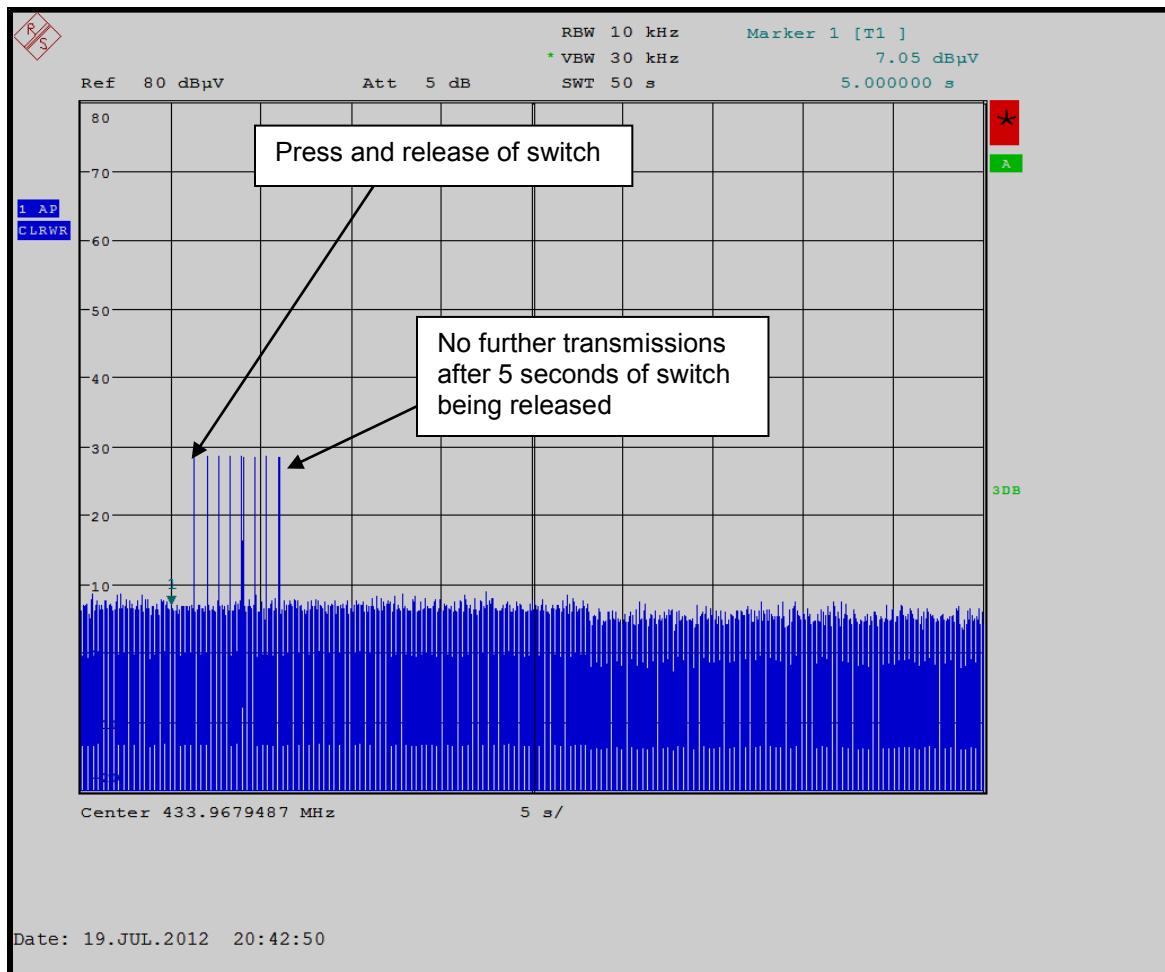
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July 19, 2012  
Date of Test

#### 4 Transmitter Deactivation – FCC 15.231(a)(1)

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

**Plot 4-1:** Transmitter Deactivation



**Table 4-1:** Transmitter Deactivation Test Equipment

| RTL Asset # | Manufacturer    | Model        | Part Type                              | Serial Number | Calibration Due Date |
|-------------|-----------------|--------------|--|---------------|----------------------|
| 901581      | Rohde & Schwarz | 1166.1660.50 | FSU Spectrum Analyzer (20 Hz – 50 GHz) | 200106        | 01/19/2013           |

**Test Personnel:**

Jon Wilson

Test Engineer

*Jon Wilson*

Signature

July 19, 2012

Date of Test

## **5 Modulated Bandwidth – FCC 15.231(c), RSS-210 A1.1.3**

### **5.1 Modulated Bandwidth Test Procedure**

The minimum 20 dB bandwidth was measured using a 50 ohm spectrum analyzer with the resolution bandwidth set at 10 kHz and the video bandwidth set at 100 kHz. The spectrum analyzer's display markers were set to -20 dB using max hold until the spectrum was filled and a plot taken.

### **5.2 FCC 15.231(c) Limits**

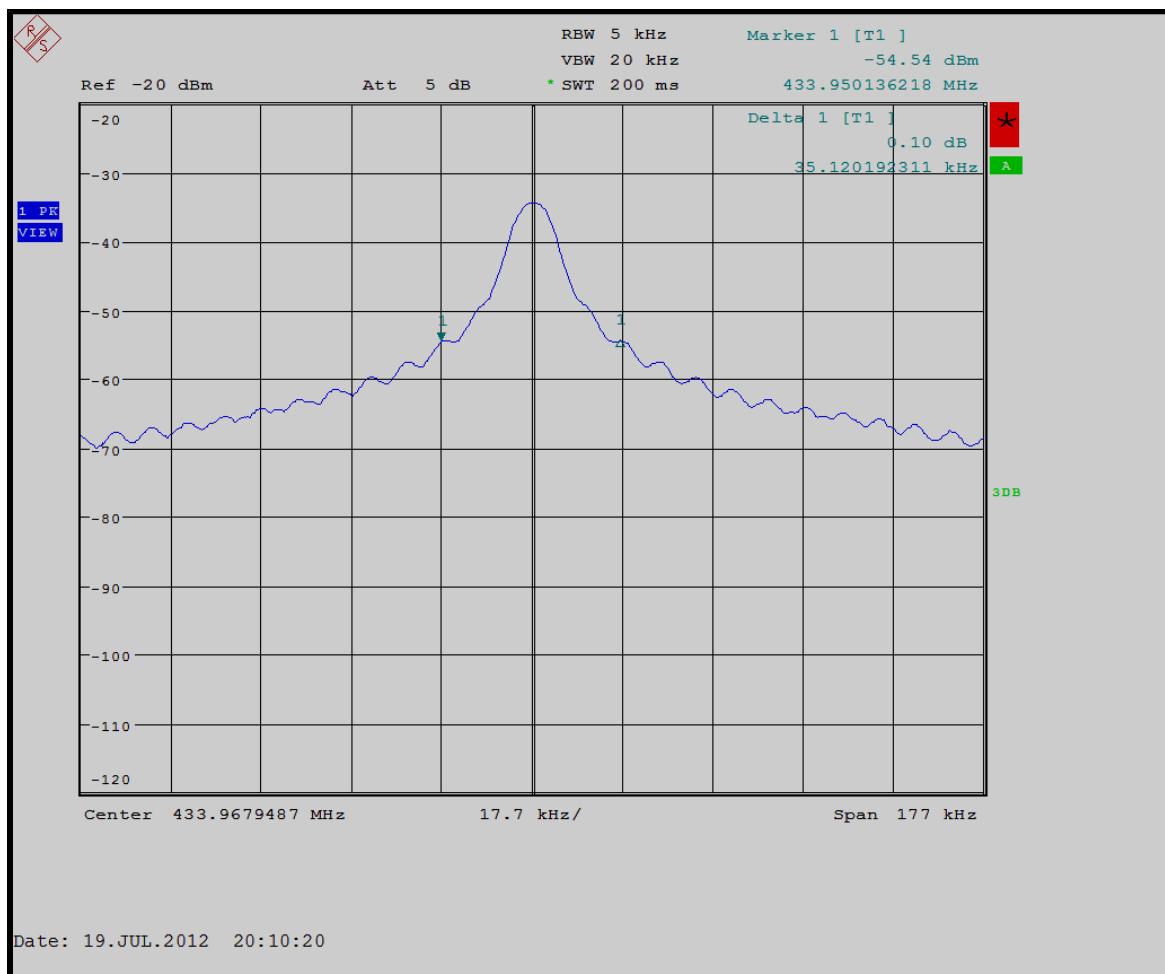
The bandwidth of the emission shall be no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz. For devices operating above 900 MHz, the emission shall be no wider than 0.5% of the center frequency. Bandwidth is determined at the points 20 dB down from the modulated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

### 5.3 Modulated Bandwidth Test Data

**Table 5-1: 20 dB Modulated Bandwidths**

| Frequency (MHz) | 20 dB Bandwidth (kHz) | Limit (kHz)            | Margin (kHz) |
|-----------------|-----------------------|------------------------|--------------|
| 433.97          | 35.1                  | 0.25% of 433970 = 1085 | -1049.9      |

**Plot 5-1: Modulated Bandwidth**



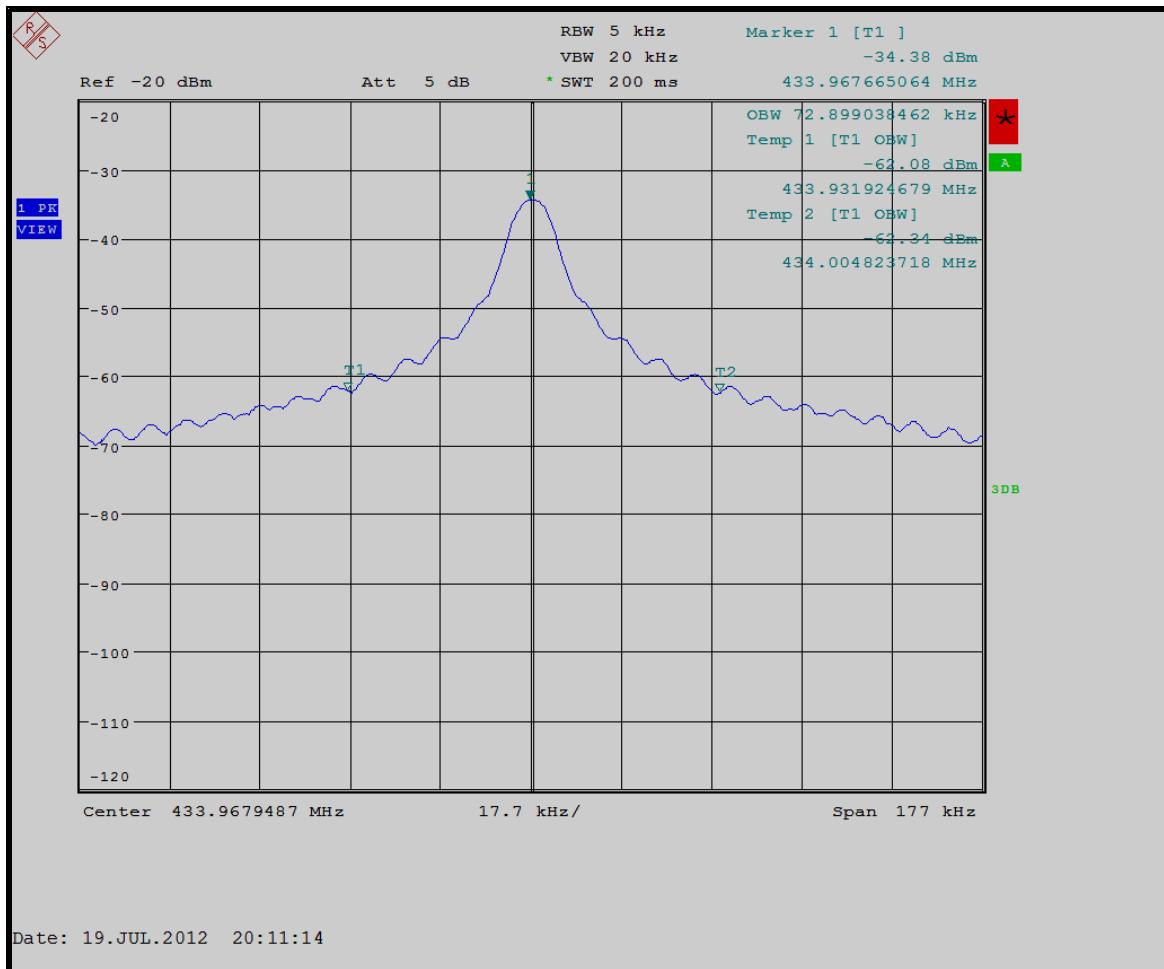
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**Table 5-2: 99% Modulated Bandwidth (RSS-210 A1.1.3)**

| Frequency (MHz) | 99% Bandwidth (kHz) | Limit (kHz)            | Margin (kHz) |
|-----------------|---------------------|------------------------|--------------|
| 433.97          | 72.9                | 0.25% of 433970 = 1085 | -1012.1      |

**Plot 5-2: Modulated Bandwidth**



**Table 5-3: Modulated Bandwidth Test Equipment**

| RTL Asset # | Manufacturer    | Model        | Part Type                              | Serial Number | Calibration Due Date |
|-------------|-----------------|--------------|--|---------------|----------------------|
| 901581      | Rohde & Schwarz | 1166.1660.50 | FSU Spectrum Analyzer (20 Hz – 50 GHz) | 200106        | 01/19/2013           |

**Test Personnel:**

Jon Wilson  
 Test Engineer

*Jon Wilson*  
 Signature

July 19, 2012  
 Date of Test

## 6 Radiated Emissions – FCC 15.209, 15.231(b)

### 6.1 Radiated Fundamental Emissions Test Procedure

Radiated emissions of the fundamentals were tested at three meters, and meet the requirements of average mode, and 20 dB higher in peak mode. The limit is calculated from a linear interpolation between 3,750 and 12,500 uV/m, and from 260-470 MHz, or 10,997 uV/m at 433.92 MHz. The EUT was tested in all three orthogonal planes. Measurement was based on a peak detector and an average level was calculated. The average level was compared to the average limit as per 15.231(b) and the peak level was compared to the average limit +20 dB per 15.35(b).

#### 6.1.1 Radiated Fundamental Emissions Limits Test Data

Table 6-1: Radiated Fundamental Emissions

| Frequency (MHz) | Peak Analyzer Reading (dBuV) | Site Correction Factor (dBm) | Peak Level Corrected (dBuV/m) | Peak Limit (dBuV/m) | Peak Margin (dB) | Duty Cycle Correction (dB) | Calculated Average Level (dBuV/m) | Average Limit (dBuV/m) | Average Margin (dB) |
|-----------------|------------------------------|------------------------------|-------------------------------|---------------------|------------------|----------------------------|-----------------------------------|------------------------|---------------------|
| 433.92          | 67.8                         | 30.5                         | 98.3                          | 100.8               | -2.5             | -20.4                      | 77.9                              | 80.8                   | -2.9                |

## 6.2 Radiated Harmonics/Spurious Emissions – FCC 15.231(b)

### 6.2.1 Radiated Emissions Harmonics/Spurious Test Procedure

Radiated emissions of the harmonics were tested at three meters. The EUT was tested in the three orthogonal planes with the receive antenna in both polarities. The emissions were maximized per ANSI C63.4:2003 8.3.1.2; that is, the measurement antenna height was varied between 1 and 4 m, and the EUT was rotated through 360° on a rotating turntable until the maximum emissions were found. Both horizontal and vertical measurement antenna polarizations were used. A resolution bandwidth of 100 kHz was used for frequencies less than 1000 MHz, and a resolution bandwidth of 1 MHz was used for frequencies greater than or equal to 1000 MHz.

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 Report #: 2012204

**Table 6-2: Radiated Spurious Harmonics**

| Emission Frequency (MHz) | Test Detector | Antenna Polarity (H/V) | Analyzer Reading (dBuV) | Site Correction Factor (dB/m) | Emission Level (dBuV/m) | Limit (dBuV/m) | Margin (dB) | Pass/Fail |
|--------------------------|---------------|------------------------|-------------------------|-------------------------------|-------------------------|----------------|-------------|-----------|
| 867.833                  | Pk            | H                      | 53.0                    | -3.2                          | 49.8                    | 80.8           | -31.0       | Pass      |
| 1301.773                 | Pk            | V                      | 45.6                    | 3.4                           | 49.0                    | 74.0           | -25.0       | Pass      |
| 1735.693                 | Pk            | H                      | 45.6                    | 7.8                           | 53.4                    | 80.8           | -27.4       | Pass      |
| 2169.605                 | Pk            | V                      | 49.3                    | -8.5                          | 40.8                    | 80.8           | -40.0       | Pass      |
| 2603.525                 | Pk            | V                      | 46.2                    | -8.6                          | 37.6                    | 80.8           | -43.2       | Pass      |
| 3037.445                 | Pk            | V                      | 46.9                    | -7.8                          | 39.1                    | 80.8           | -41.7       | Pass      |
| 3471.365                 | Pk            | V                      | 47.3                    | -6.8                          | 40.5                    | 80.8           | -40.3       | Pass      |
| 3905.285                 | Pk            | V                      | 47.1                    | -6.4                          | 40.7                    | 74.0           | -33.3       | Pass      |
| 4339.205                 | Pk            | V                      | 44.8                    | -1.2                          | 43.6                    | 74.0           | -30.4       | Pass      |

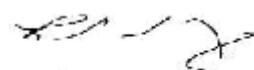
**Table 6-3: Radiated Spurious Test Equipment**

| RTL Asset # | Manufacturer                     | Model                     | Part Type                                 | Serial Number | Calibration Due Date |
|-------------|----------------------------------|---------------------------|---|---------------|----------------------|
| 900905      | Rhein Tech Laboratories, Inc.    | PR-1040                   | Amplifier (20 MHz - 2 GHz)                | 900905        | 07/14/2012           |
| 900724      | Antenna Research Associates, Inc | LPB-2520                  | Bilog Periodic Antenna (25 MHz - 2 GHz)   | 1037          | 02/02/2013           |
| 900913      | Hewlett Packard                  | 85462A                    | EMI Receiver RF Section (9 kHz - 6.5 GHz) | 3325A00159    | 08/17/2012           |
| 900914      | Hewlett Packard                  | 85460A                    | RF Filter Section (100 kHz - 6.5 GHz)     | 3330A00107    | 08/17/2012           |
| 900930      | Hewlett Packard                  | 8566B                     | Spectrum Analyzer (100 Hz - 22 GHz)       | 3138A07771    | 09/13/2012           |
| 901364      | Rhein Tech Laboratories, Inc.    | 1003                      | Amplifier                                 | N/A           | 2/22/2012            |
| 900772      | EMCO                             | 3161-02                   | Horn Antenna (2 - 4 GHz)                  | 9804-1044     | 6/13/2012            |
| 900321      | EMCO                             | 3161-03                   | Horn Antenna (4 - 8.2 GHz)                | 9508-1020     | 6/13/2012            |
| N/A         | Rhein Tech Laboratories, Inc.    | Automated Emission Tester | Emissions Testing Software                | Rev. 14.0.2   | N/A                  |

**Test Personnel:**

Rick McLay

Test Engineer



Signature

December 21, 2011

Date of Test

**Table 6-4: Radiated Digital Unintentional Emissions**

| Temperature: 83°F      Humidity: 63% |               |                        |                         |                    |                         |                               |                         |                |             |           |
|--------------------------------------|---------------|------------------------|-------------------------|--------------------|-------------------------|-------------------------------|-------------------------|----------------|-------------|-----------|
| Emission Frequency (MHz)             | Test Detector | Antenna Polarity (H/V) | Turntable Azimuth (deg) | Antenna Height (m) | Analyzer Reading (dBuV) | Site Correction Factor (dB/m) | Emission Level (dBuV/m) | Limit (dBuV/m) | Margin (dB) | Pass/Fail |
| 60.000                               | Qp            | H                      | 10                      | 3.0                | 42.7                    | -22.8                         | 19.9                    | 40.0           | -20.1       | Pass      |
| 215.000                              | Qp            | V                      | 120                     | 1.0                | 36.3                    | -18.3                         | 18.0                    | 43.5           | -25.5       | Pass      |
| 433.900                              | Qp            | V                      | 90                      | 1.0                | 37.2                    | -9.2                          | 28.0                    | 46.0           | -18.0       | Pass      |
| 867.800                              | Qp            | V                      | 180                     | 1.5                | 35.5                    | -2.7                          | 32.8                    | 46.0           | -13.2       | Pass      |
| 1301.700                             | Av            | H                      | 45                      | 1.0                | 34.8                    | 4.0                           | 38.8                    | 54.0           | -15.2       | Pass      |
| 1735.600                             | Av            | H                      | 180                     | 1.0                | 35.3                    | 7.8                           | 43.1                    | 54.0           | -10.9       | Pass      |

**Table 6-5: Radiated Digital Unintentional Emissions Test Equipment**

| RTL Asset # | Manufacturer                  | Model         | Part Type                                 | Serial Number   | Calibration Due Date |
|-------------|-------------------------------|---------------|---|-----------------|----------------------|
| 901364      | Rhein Tech Laboratories, Inc. | PR-1042       | 40dB PreAmplifier, (1 - 18 GHz)           | 1003            | 07/14/2013           |
| 900905      | Rhein Tech Laboratories, Inc. | PR-1040       | Preamplifier 40dB (30 MHz – 2 GHz)        | 1006            | 07/14/2013           |
| 900878      | Rhein Tech Laboratories, Inc. | AM3-1197-0005 | 4 meter antenna mast, polarizing          | Outdoor Range 1 | Not Required         |
| 901334      | RF Depot                      | N/A           | RF cable, 30'                             | NA              | 05/24/2013           |
| 901336      | RF Depot                      | N/A           | RF cable, 3'                              | NA              | 05/24/2013           |
| 901242      | Rhein Tech Laboratories, Inc. | WRT-000-0003  | Polystyrene rotating table                | N/A             | Not Required         |
| 900913      | Hewlett Packard               | 85462A        | EMI Receiver RF Section (9 kHz – 6.5 GHz) | 3325A00159      | 08/02/2012           |
| 900914      | Hewlett Packard               | 85460A        | RF Filter Section, (100 kHz - 6.5 GHz)    | 3330A00107      | 08/02/2012           |
| 900772      | EMCO                          | 3161-02       | Horn Antenna (2 - 4 GHz)                  | 9804-1044       | 04/20/2017           |
| 900321      | EMCO                          | 3161-03       | Horn Antenna (4.0 - 8.2 GHz)              | 9508-1020       | 04/20/2017           |
| 901581      | Rohde & Schwarz               | 1166.1660.50  | FSU Spectrum Analyzer (20 Hz – 50 GHz)    | 200106          | 01/19/2013           |

**Test Personnel:**

Jon Wilson  
 Test Engineer

  
 Signature

July 16, 2012  
 Date of Test

## 7 Conducted Emissions

### 7.1 Site and Test Description

The power line conducted emissions measurements were performed in a Series 81 type shielded enclosure manufactured by Rayproof. The EUT was assembled on a wooden table 80 centimeters high. Power was fed to the EUT through a 50 ohm/50 microhenry Line Impedance Stabilization Network (LISN). The EUT LISN was fed power through an A.C. filter box on the outside of the shielded enclosure. The filter box and EUT LISN housing are bonded to the ground plane of the shielded enclosure. A second LISN, the peripheral LISN, provides isolation for the EUT test peripherals. This peripheral LISN was also fed A.C. power. A metal power outlet box, which is bonded to the ground plane and electrically connected to the peripheral LISN, powers the EUT host peripherals.

The spectrum analyzer was connected to the A.C. line through an isolation transformer. The 50 ohm output of the EUT LISN was connected to the spectrum analyzer input through a Solar 100 kHz high-pass filter. The filter is used to prevent overload of the spectrum analyzer from noise below 100 kHz. Conducted emission levels were measured on each current-carrying line with the spectrum analyzer operating in the CISPR quasi-peak mode (or peak mode if applicable). The analyzer's 6 dB bandwidth was set to 9 kHz. Video filter less than 10 times the resolution bandwidth is not used. Average measurements are performed in linear mode using a 10 kHz resolution bandwidth, a 1 Hz video bandwidth, by increasing the sweep time in order to obtain a calibrated measurement. The emission spectrum was scanned from 150 kHz to 30 MHz. The highest emission amplitudes relative to the appropriate limits were measured and have been recorded. The limits for Class A and Class B are contained therein.

### 7.2 Test Limits

| Class A Line-Conducted Emissions |            |         |
|----------------------------------|------------|---------|
| Limit (dB $\mu$ V)               |            |         |
| Frequency (MHz)                  | Quasi-Peak | Average |
| 0.15 to 0.50                     | 79         | 66      |
| 0.50 to 30.0                     | 73         | 60      |

| Class B Line-Conducted Emissions |            |          |
|----------------------------------|------------|----------|
| Limit (dB $\mu$ V)               |            |          |
| Frequency (MHz)                  | Quasi-Peak | Average  |
| 0.15 to 0.50                     | 66 to 56   | 56 to 46 |
| 0.50 to 5.00                     | 56         | 46       |
| 5.00 to 30.00                    | 60         | 50       |

### 7.3 Conducted Emissions Test Results

Testing is N/A – the EUT is battery powered.

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Client: STI  
Model: 34072  
Standards: FCC 15.231/IC RSS-210  
ID's: TXL34072/6335A-34072  
Report #: 2012204

## **8 Conclusion**

The data in this measurement report shows that Safety Technology International, Inc. Model 34072, FCC ID: TXL34072 IC: 6335A-34072, complies with all the applicable requirements of Parts 2 and 15 of the FCC Rules and IC RSS-210.