## **Product Safety Engineering, Inc**

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Testing Certification # 1367-01

# **TEST REPORT**

06F218 04/16/2008

#### **Applicant:**

Commercial Wireless Systems International LLC 10798 NW 53<sup>rd</sup> Street Sunrise, Fl 33351

> **Product:** Model - 310, 320, 321 & 330 Wireless Fire Alarm Sensors

In Accordance with FCC Part 15.247

Test dates: 09/07/2006 - 02/20/2007

Receive Date: 08/30/2006

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jtum & Hohe

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Commercial Wireless Systems

FCC ID: V7L31032021330

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# **Test Procedures**

**Product description**: The system utilizes FHSS type transmitters. The CWSI alarm sensors are comprised of models 310, 320, 321 and 330. The model 310 is a fire pull station which is manually activated. Models 320 and 321 are heat detectors each having a unique temperature operating range responsible for monitoring the change of room temperature. The model 330 monitors normally open dry contacts for an alarm condition. All of these models are part of a larger system that includes a central processing device, repeater and smoke detectors. Each of these models has an identical PWB which includes the transceiver.

**Powerline conducted interference:** The AC powerline conducted emissions measurements were not applicable due to battery operation.

**20 dB Bandwidth:** The EUT had its hopping function disabled while modulated. The spectrum analyzer span was set to (2-3) times the (20) dB bandwidth. The spectrum analyzer was placed in peak hold mode and the upper and lower points of the waveform were measured at a level that was (20) dB down from the peak amplitude. This was repeated for a low, mid and high frequency channel.

**Channel Separation:** The EUT had its hopping function enabled. The span on the spectrum analyzer was set wide enough to capture at least (2) adjacnet channels. The channel separation was determined by measuring the peak frequency of (2) adjacent channels.

**Description of frequency hopping system**: The system utilizes 25 channels from 904.296 MHz to 926.250 MHz in the ISM band. The RF Unit hops though each of these channels at a rate of 375ms per channel, for a total hopping loop of 9.375 seconds. The system initiates data transmissions completely asynchronously from the hopping system which creates a random distribution of data for each channel. All messages are also acknowledged, which provides significant bandwidth throttling (i.e. messages can not be sent continuously) which limits duty cycle per transmitter about 50%. Due to system limitations such as a maximum payload size of 32bytes, 5khz bit rate, and a fixed 7 bytes packet overhead, the longest time a RF transmitter can be active is 78ms. All channels are used all of the time. There are not any facilities to detect jammed or undesirable channels and remove them from the hopping system.

**Receiver bandwidth:** The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

**Number of hopping frequencies:** With the spectrum analyzer in peak hold, we stored an image of all the channels operating and then produced a plot of the analyzer. We manually counted each channel to determine the number.

**Dwell time:** The EUT had its hopping function enabled. The average time of occupancy was first determined by measuring the width of a single channel with the spectrum analyzer in a zero span mode and then with the analyzer in a peak hold mode, a (10) second sweep was then performed to determine how many single channels occupied a (10) second period of time.

**RF Exposure Compliance Requirements:** 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 levels in excess of the Commission's guidelines. Computations included in test report.

**Peak output power**: The EUT has an integrated antenna that prohibited direct connection to the measuring equipment. We performed radiated field strength measurements as an alternative test procedure as defined in FCC DA 00-705.

Conducted output power: Not applicable for integrated antenna.

**Operation with directional antenna gains greater than 6 dBi:** Not applicable for integrated antenna.

**Spurious emissions:** All spurious emissions were measured up to the tenth harmonic per ANSI C63.4:2003.

**Restricted Band Compliance:** All emissions were measured per ANSI C63.4:2003 and compared to the restricted band list.

#### Other conditions of operation per 15.247

15.247 (a) (1) - The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter.

Each transmitter hops over a pseudo-random list of 36 distinct hopping frequencies. Transmitters will remain in a frequency for 398 ms (hop period). Transmitters will hop into each frequency in the list (and remain at that frequency for the hop period) until each frequency has been "hopped into" once (hop cycle). Transmitters will start a new hop cycle once the previous one completes.

15.247 (g) - Frequency hopping spread spectrum systems are not required to employ all available hopping channels during each transmission. However, the system, consisting of both the transmitter and the receiver, must be designed to comply with all of the regulations in this section should the transmitter be presented with a continuous data (or information) stream. In addition, a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.

# The system does not make use of continuous data streams. All communication is achieved via short messages (less than 40 milliseconds) sent during a transmit opportunity within a hop. Messages can be transmitted or received on any hopping channel/frequency. Messages are not transmitted more than once within the same hop.

15.247 (h) - The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.

The system does not implement any intelligence that permits it to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels. The system does not coordinate in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters.

# **Test Summary**

Name of Test	Paragraph No.	Specification	Measurement	Result	
Powerline Conducted Emissions	15.207(a)	Table 15.207(a)	Not applicable	Complies	
Channel Separation	15.247(a)(1)	Greater of 25 kHz or 20 dB bandwidth	930 kHz	Complies	
Pseudo-random Hopping Algorithm	15.247(a)(1)	See Page 4	Not applicable	e Complies	
Hopping Frequencies	15.247(a)(1)(i)	at least 25	25	Complies	
Dwell Time	15.247(a)(1)(ii)	<0.4 sec in 10 sec	0.097 sec in 10 sec	Complies	
20 dB Occupied Bandwidth	15.247(a)(1)	>250 kHz <500 kHz	270 - 297 kHz	Complies	
Peak Output Power	15.247(b)	0.25 Watts	0.0053 Watts	Complies	
Spurious Emissions (Conducted / Radiated)	15.247(d)	-20 dBc (peak) -30 dBc (avg)	- 45.0 dBc	Complies	
Spurious Emissions (Radiated)	15.247(d)	54.0 dBuV/m per Table 15.209(a)	44.1 dBuV/m	Complies	

# Test: Output Power per 15.247(b)(2)

Date: 02/20/2007

**Requirement:** The maximum peak conducted output power of the intentional radiator shall not exceed 1 watt for systems employing at least 50 hopping channels; and, 0.25 watts for systems employing less than 50 hopping channels, but at least 25 hopping channels

**Result:** Peak Output Power = (5.3) mW See exhibit # 6.

RBW: (1) MHz VBW: (3) MHz

 $\mathbf{P} = (\mathbf{E}\mathbf{D}^2 / \mathbf{30G})$ 

Measuring Antenna Correction Factor = 24.4 dB Cable loss = 2.5 dB Preamp Gain = 23.3

Channel	Level Received dBuV	ACF, Cable loss & Preamp Gain	Corrected Level dBuV/m	Level V/m	Distance	Antenna Gain (N)	Watts mW
low	98.3	3.6	101.9	0.124	3 m	1	4.6
Mid	98.9	3.6	102.5	0.133	3 m	1	5.3
high	95.6	3.6	99.2	0.091	3 m	1	2.5

#### **Test Equipment:**

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

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# **Test: Powerline conducted interference per 15.207**

Date: 02/20/2007

**Requirement:** 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:

Freq (MHz)	Quasi-peak dBuV	Average dBuV
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

\*Decreases with the logarithm of the frequency.

**Result:** The EUT is battery powered and therefore exempt from this test.

RBW: (9) kHz VBW: (10) kHz

See exhibit 1

# Test: 20 dB Bandwidth

#### Date:02/20/2007

Requirement: The 20 dB bandwidth is required for other technical requirements.

**Result:** The 20 dB bandwidth was measured at the low, mid and high frequency of operation. The bandwidths are listed below:

Frequency (MHz)	ency (MHz) Channel	
904.3	Low	283 kHz
915.3	Mid	297 kHz
926.3	High	270 kHz

See exhibit 2

Span:2 MHz RBW: (10) kHz VBW: (1) MHz Channel: Low, mid and high

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

# **Test: Carrier Frequency Separation per 15.247(a)(1)**

Date: 02/20/2007

**Requirement:** Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

**Result:** The 20 dB bandwidth was measured at the mid frequency of operation. The separation was found to be (928) kHz..

See Exhibit 3

RBW: (100) kHz VBW: (1) MHz

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

# Test: Number of hopping frequencies per 15.247(a)(1)(i)

#### Date: 02/20/2007

**Requirement:** If the 20 dB bandwidth of the hopping channel is 250 kHz or greater, the system shall use at least 25 hopping frequencies

**Result:** The 20 dB bandwidth was measured for low, middle and high frequency operation and the bandwidth was found to be between (270 - 297) kHz. We observed 25 hopping frequencies.

See exhibit 4.

RBW: (300) kHz VBW: (1) MHz

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

# **Test: Dwell time per 15.247(a)(1)(i)**

#### Date:02/20/2007

**Requirement:** The average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period when the 20 dB bandwidth of the hopping channel is greater than 250 kHz.

**Result:** The analyzer was placed in a peak hold mode for greater than (10) seconds. The dwell time was measured and found to be (97) mSec which is less than the (400) mSec allowed..

**Note:** The 20 dB bandwidth was measured for low, middle and high frequency operation and the maximum bandwidth was found to be between (270 - 297) kHz

See exhibit 5.

Span: Zero RBW: (300) kHz VBW: (1) MHz

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

## Test: Spurious emissions per 15.247(d)

#### Date: 02/20/2007

**Requirement:** 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.

**Result:** The spurious emissions were measured up to the tenth harmonic. The highest spurious emission was found to be (1.852) GHz at (57.5) dB. The highest inband level measured was (102.5) dBuV/m at (915.3) MHz. under the limit. The limit for out of band emissions is (82.5) dBuV/m. The worst case out of band emission measured was (25.0) dB below the limit.

See exhibit 6

RBW: (1) MHz VBW: (3) MHz Channel: Low, mid and high.

Additional Requirement: Emissions which fall in the restricted bands, as defined by in 15.205(a), must also comply with the radiated emissions limits specified in 15.209.

**Result:** Emissions found in restricted bands did not exceed the limit as shown on exhibit 7.

#### **Test Equipment:**

Manufacturer	Model	Description	Serial Number	Cal Due
Hewlett Packard	8566B	Spectrum Analyzer	2421A00526	07/18/07
Hewlett Packard	8447D	Preamp 0.1 - 1,000 MHz	2944A06832	12/04/07
Hewlett Packard	8449B	Preamp 1 - 26.5 GHz	3008A00320	05/11/07
EMC Automation	HLP3003C	Hybrid Log Periodic	017501	05/02/07
Electro-Mechanics	3115	Double Ridge Guide Ant	3810	11/28/07

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### **RF Exposure - Power Density Compliance Calculation**

15.247(I) - 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 levels in excess of the Commission's guidelines.

Compliance is based upon section CFR 47 section 1.1310, Table (1) Limits for Maximum Permissible Exposure (MPE), (b) Limits for General Population/Uncontrolled Exposure. The stated limit is (1.0) mW/cm2 and compliance was calculated using the following formula:

$$S=(P G) / (4 \pi r^2)$$

Where:

S = Power density in mW/cm2P = Power in mWG = Numerical antenna gain

r = Distance in cm

Maximum output power = (5.3) mW Antenna gain (numeric) = 1.00 dB Distance = 20 cm

> S = (5.3 \* 1.00) / (12.57 \* 400) S = (5.3) / (5,028) $S = (0.00105) \text{ mW} / \text{cm}^2$

Limit = (1.0) mW / cm<sup>2</sup>

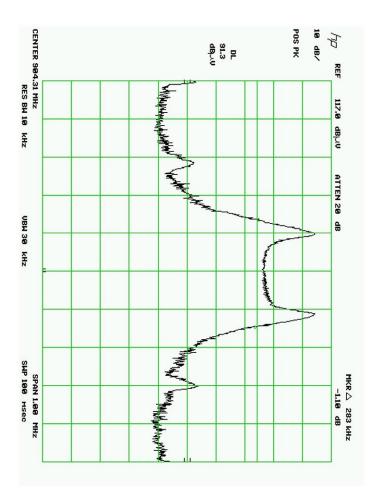
# Antenna Specifications

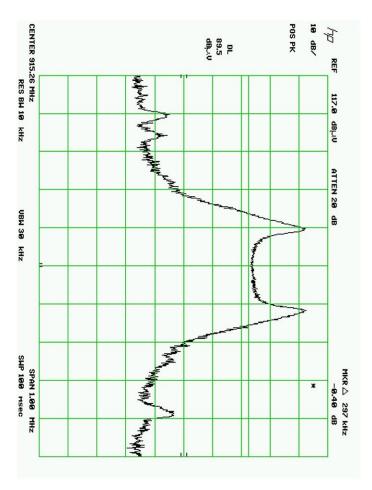
This EUT incorporates an integrated antenna that is part of the PWB.

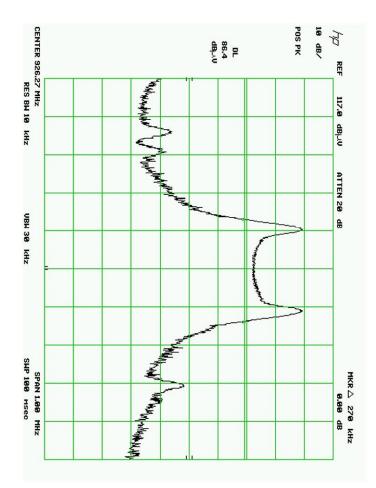
Exhibit 1

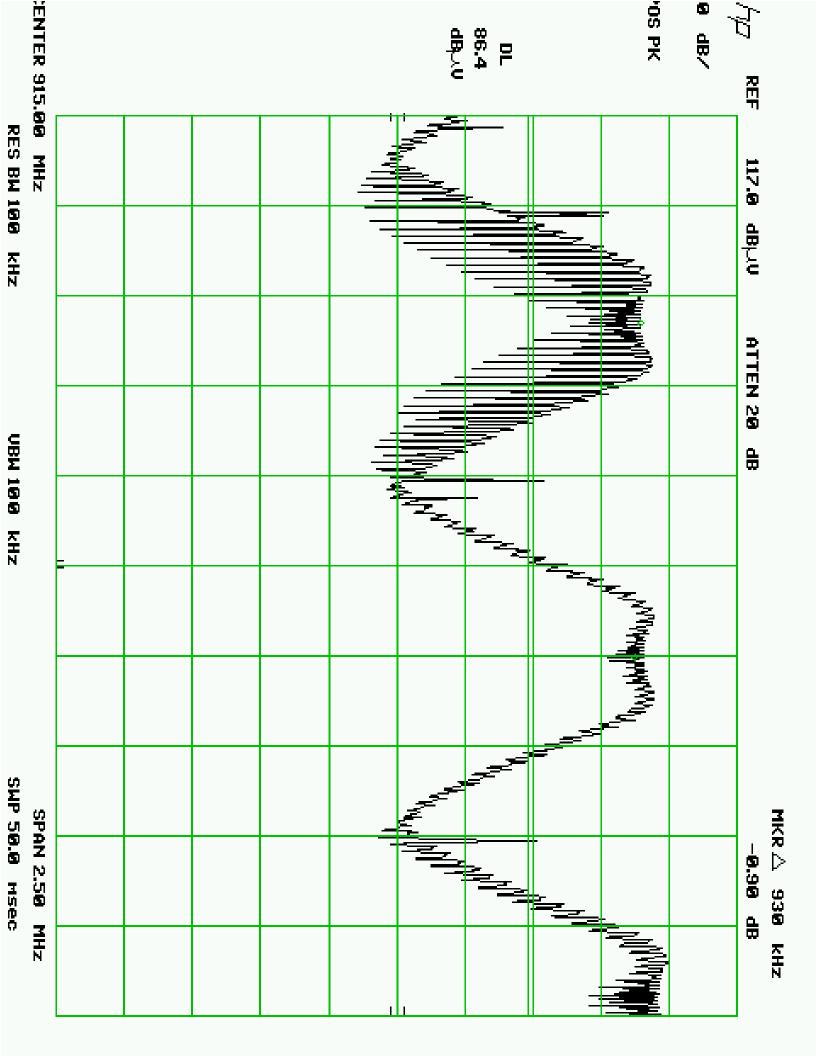
# POWERLINE CONDUCTED EMISSIONS

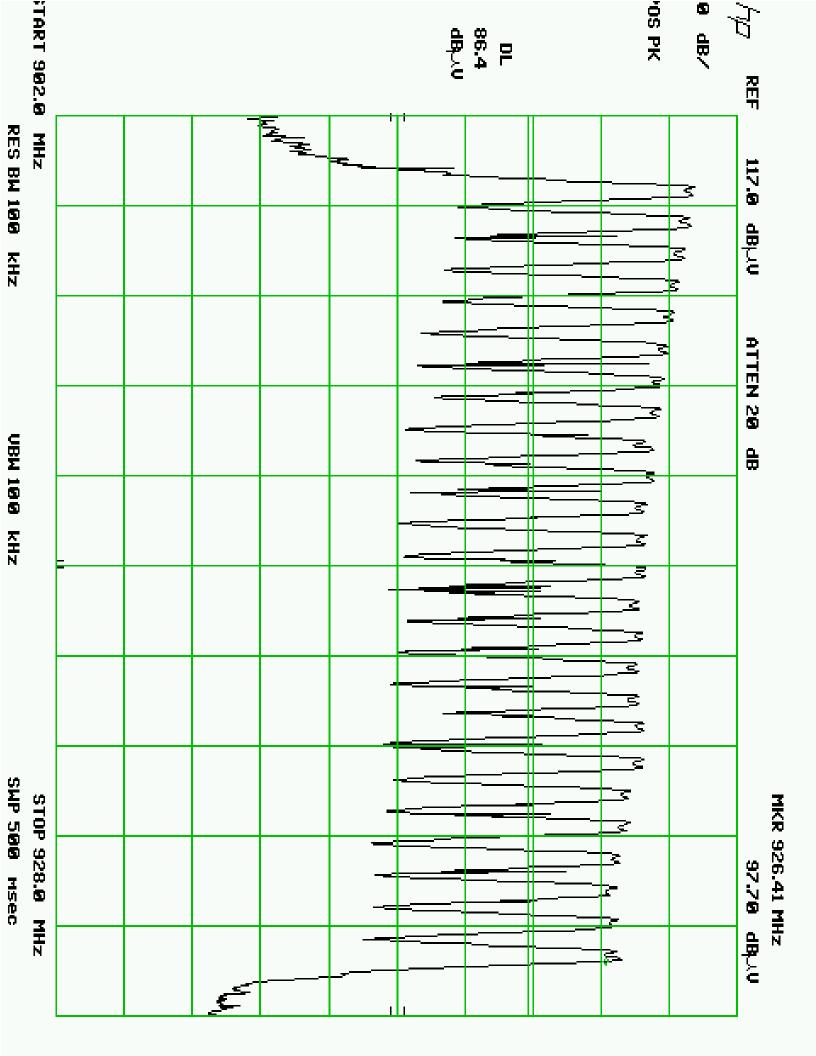
Not Applicable

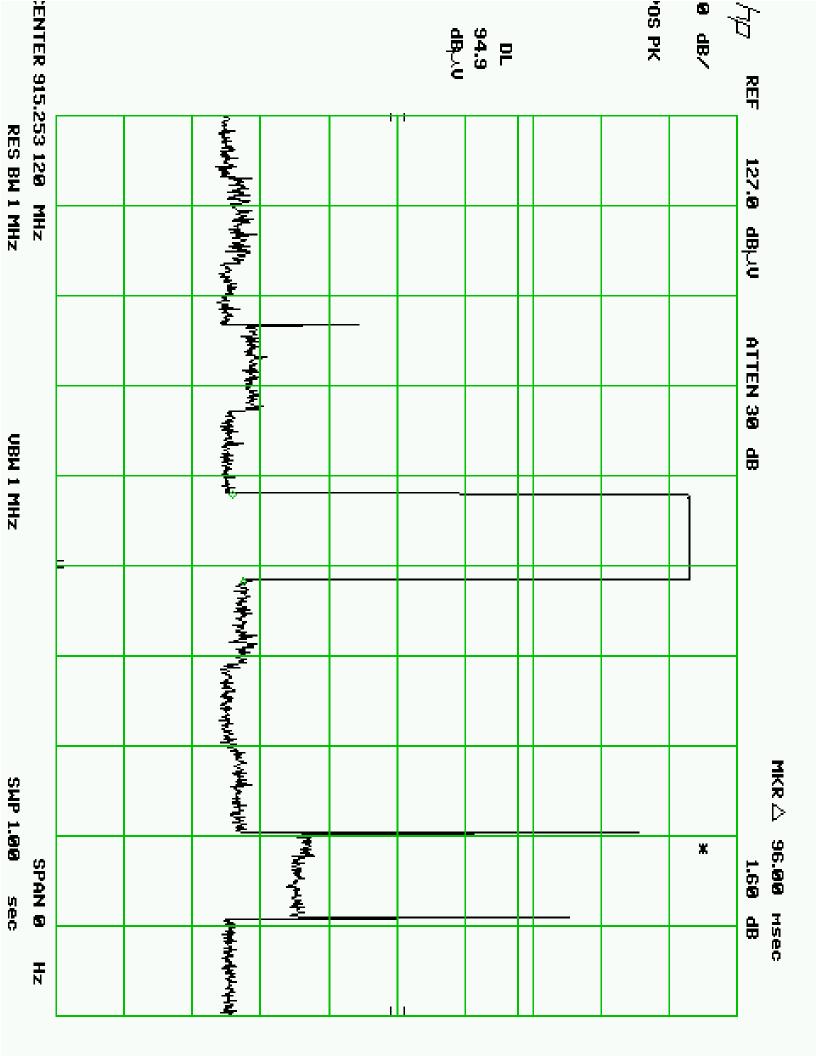


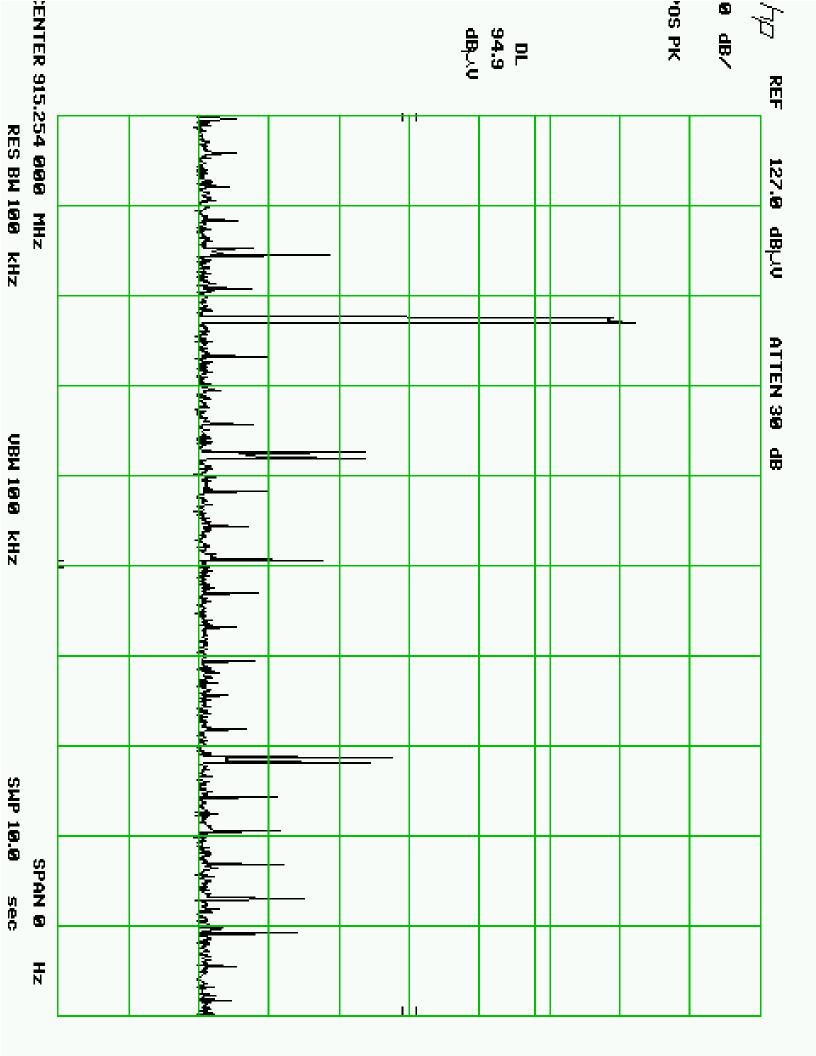












Low Freq. (MHz)	904.3	1808.6	2712.9	3617.2	4521.5	5425.8	6330.1	7234.4	8138.7	9043
Harmonic	1	2	-	4	5	-	7	-	-	
Distance (meters)	3	3	-	3	3	•	3	-	-	•
V/m (CW)	1.24E-01	4.95E-04	5.70E-05	6.80E-05	5.89E-05	6.40E-05	1.95E-04			
dBuV/m	101.9	53.9		36.7	35.4		45.8	38.8	40.4	41.3
Restricted Band	N	N	Y	Y	Y		N	Y	Y	Y
Restricted Band Margin			18.9	17.3	18.6	17.9		15.2	13.6	12.7
Numeric Gain	1	1	1	1	1	1	1	1	1	1
Power (Watts)	0.0046128	7.351E-08	9.747E-10							
Power (dBm)	6.63964625	-41.336683	-60.11129	-58.578609	-59.826482	-59.105188	-49.4280952	-56.438402	-54.8050015	-53.9396277
dBc		-48.0	-66.8	-65.2	-66.5	-65.7	-56.1	-63.1	-61.4	-60.6
Mid Freq. (MHz)	915.3	1830.6	2745.9	3661.2	4576.5	5491.8	6407.1	7322.4	8237.7	9153
Harmonic	1	2	3	4	5	6	7	8	9	10
Distance (meters)	3	3	3	3	3	3	3	3	3	3
V/m (CW)	1.33E-01	3.20E-04	8.30E-05	7.80E-05	7.10E-05	9.10E-05	8.60E-05	8.70E-05	8.50E-05	8.80E-05
dBuV/m	102.5	50.1	38.4	37.8	37.0	39.2	38.7	38.8	38.6	38.9
Restricted Band	N	N	Y	Y	Y	Y	N	Y	Y	Y
Restricted Band Margin			15.6	16.2	17.0	14.8		15.2	15.4	15.1
Numeric Gain	1	1	1	1	1	1	1	1	1	1
Power (Watts)	0.0053067	3.072E-08	2.0667E-09	1.825E-09	1.5123E-09	2.4843E-09	2.2188E-09	2.2707E-09	2.1675E-09	2.3232E-09
Power (dBm)	7.248245367	-45.125788	-56.847226	-57.386895	-58.20362		-56.5388184	-56.438402	-56.6404089	
dBc		-52.4	-64.1	-64.6	-65.5	-63.3	-63.8	-63.7	-63.9	-63.6
High Freq. (MHz)	926.3	1852.6	2778.9	3705.2	4631.5	5557.8	6484.1	7410.4	8336.7	9263
Harmonic	1	2	3	4	5	6	7	8	9	10
Distance (meters)	3	3	3	3	3	3	3	3	3	3
V/m (CW)	9.14E-02	7.50E-04	1.10E-04	7.70E-05	1.60E-04	8.20E-05	1.45E-04	1.01E-04	1.03E-04	1.15E-04
dBuV/m	99.2	57.5	40.8	37.7	44.1	38.3	43.2	40.1	40.3	41.2
Restricted Band	N	N	Y	Y	Y	Y	N	Y	Y	Y
Restricted Band Margin			13.2	16.3	9.9	15.7		13.9	13.7	12.8
Numeric Gain	1	1	1	1	1	1	1	1	1	1
Power (Watts)	0.002506188	1.688E-07	3.63E-09	1.779E-09	7.68E-09	2.0172E-09	6.3075E-09	3.0603E-09	3.1827E-09	3.9675E-09
Power (dBm)		-37.727562			-51.146388		-52.0014274			
dBc		-41.7	-58.4	-61.5	-55.1	-60.9	-56.0		-59.0	