

ELECTROMAGNETIC EMISSION COMPLIANCE REPORT FOR LOW-POWER, NON-LICENSED TRANSMITTER

Test Report No. : OT-218-RWD-031

Reception No. : 2104003237

Applicant : Suntech International Ltd.

Address : A-1705, A-1706, Greatvally, 32, Digital-ro 9-gil, Geumcheon-Gu, Seoul, Korea

Manufacturer : Suntech International Ltd.

Address : A-1705, A-1706, Greatvally, 32, Digital-ro 9-gil, Geumcheon-Gu, Seoul, Korea

Type of Equipment : Tracking Device

FCC ID. : WA2ST4250

Model Name : ST4250

Multiple Model Name : N/A

Serial number : N/A

Total page of Report : 32 pages (including this page)

Date of Incoming : July 28, 2021

Date of issue : August 12, 2021

SUMMARY

The equipment complies with the regulation; *FCC PART 15 SUBPART C Section 15.247*

This test report only contains the result of a single test of the sample supplied for the examination.

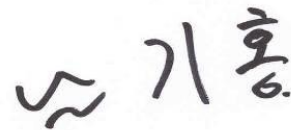
It is not a generally valid assessment of the features of the respective products of the mass-production.



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Revision History

Rev. No.	Issue Report No.	Issued Date	Revisions	Section Affected
0	OT-218-RWD-031	August 12, 2021	Initial Release	All

1. VERIFICATION OF COMPLIANCE

Applicant : Suntech International Ltd.
 Address : A-1705, A-1706, Greatvally, 32, Digital-ro 9-gil, Geumcheon-Gu, Seoul, Korea
 Contact Person : Sang-Kyu, Lee / General Manager
 Telephone No. : +82-2-6327-5662
 FCC ID : WA2ST4250
 Model Name : ST4250
 Brand Name : Suntech International
 Serial Number : N/A
 Date : August 12, 2021

EQUIPMENT CLASS	DTS – DIGITAL TRNSMISSION SYSTEM
E.U.T. DESCRIPTION	Tracking Device
THIS REPORT CONCERNS	Original Grant
MEASUREMENT PROCEDURES	ANSI C63.10: 2020
TYPE OF EQUIPMENT TESTED	Pre-Production
KIND OF EQUIPMENT AUTHORIZATION REQUESTED	Certification
EQUIPMENT WILL BE OPERATED UNDER FCC RULES PART(S)	FCC PART 15 SUBPART C Section 15.247 KDB 558074 D01 15.247 Meas Guidance v05r02
Modifications on the Equipment to Achieve Compliance	None
Final Test was Conducted On	3 m, Semi Anechoic Chamber

-. The above equipment was tested by ONETECH Corp. for compliance with the requirement set forth in the FCC Rules and Regulations. This said equipment in the configuration described in this report, shows the maximum emission levels emanating from equipment are within the compliance requirements.

2. TEST SUMMARY

2.1 Test items and results

SECTION	TEST ITEMS	RESULTS
15.247 (a) (2)	Minimum 6 dB Bandwidth	Met the Limit / PASS
15.247 (b) (3)	Maximum Peak Conducted Output Power	Met the Limit / PASS
15.247 (d)	100 kHz Bandwidth Outside the Frequency Band	Met the Limit / PASS
15.247 (d)	Radiated Emission which fall in the Restricted Band	Met the Limit / PASS
15.247 (e)	Peak Power Spectral Density	Met the Limit / PASS
15.209	Radiated Emission Limits	Met the Limit / PASS
15.207	Conducted Limits	N/A (See Note)
15.203	Antenna Requirement	Met requirement / PASS

Note: This test is not performed because the EUT is operated by DC battery.

2.2 Additions, deviations, exclusions from standards

No additions, deviations or exclusions have been made from standard.

2.3 Related Submittal(s) / Grant(s)

Original submittal only

2.4 Purpose of the test

To determine whether the equipment under test fulfills the requirements of the regulation stated in FCC PART 15 SUBPART C Section 15.247.

2.5 Test Methodology

Both conducted and radiated testing was performed according to the procedures in ANSI C63.10: 2020. Radiated testing was performed at a distance of 3 m from EUT to the antenna.

2.6 Test Facility

The Onetech Corp. has been designated to perform equipment testing in compliance with ISO/IEC 17025.

The Electromagnetic compatibility measurement facilities are located at 43-14, Jinsaegol-gil, Chowol-eup, Gwangju-si, Gyeonggi-do, 12735, Korea.

-. Site Filing:

VCCI (Voluntary Control Council for Interference) – Registration No. R-20122/ C-14617/ G-10666/ T-11842

ISED (Innovation, Science and Economic Development Canada) – Registration No. Site# 3736A-3

KOLAS (Korea Laboratory Accreditation Scheme) - Accreditation NO. KT085

FCC (Federal Communications Commission) - Accreditation No. KR0013

RRA (Radio Research Agency) – Designation No. KR0013

3. GENERAL INFORMATION

3.1 Product Description

The Suntech International Ltd., Model ST4250 (referred to as the EUT in this report) is a Tracking Device. The product specification described herein was obtained from product data sheet or user’s manual.

DEVICE TYPE	Tracking Device
TEMPERATURE RANGE	-20 °C ~ 55 °C
OPERATING FREQUENCY	2 402 MHz ~ 2 480 MHz
MODULATION TYPE	GFSK (Bluetooth LE)
NUMBER OF CHANNEL	40 Channel
RF OUTPUT POWER	6.49 dBm
ANTENNA TYPE	PCB Antenna
ANTENNA GAIN	-0.06 dBi
List of each Osc. or crystal Freq.(Freq. >= 1 MHz)	32 MHz

3.2 Alternative type(s)/model(s); also covered by this test report.

-. None

4. EUT MODIFICATIONS

-. None

5. SYSTEM TEST CONFIGURATION

5.1 Justification

This device was configured for testing in a typical way as a normal customer is supposed to be used. During the test, the following components were installed inside of the EUT.

DEVICE TYPE	MANUFACTURER	MODEL/PART NUMBER	FCC ID
Main Board	Suntech International Ltd.	ST4250_MAIN_Rev02	N/A
SUB Board	Suntech International Ltd.	ST4250_OBD Rev.02	N/A
Antenna	N/A	N/A	N/A
Battery	N/A	PD2006	N/A
Module	Quectel Wireless Solutions Company Limited	BG95-M3	XMR201910BG95M3

5.2 Peripheral equipment

-. None

5.3 Mode of operation during the test

For the testing, software used to control the EUT for staying in continuous transmitting is programmed.

For final testing, the EUT was set at 2 402 MHz, 2 440 MHz, and 2 480 MHz to get a maximum emission levels from the EUT. The EUT was moved throughout the XY, XZ, and YZ planes and the worst case is “XZ” axis, but the worst data was recorded in this report.

-. Channel List (Bluetooth LE)

Channel	Frequency[MHz]	Channel	Frequency[MHz]	Channel	Frequency[MHz]
0	2 402.00	14	2 430.00	28	2 458.00
1	2 404.00	15	2 432.00	29	2 460.00
2	2 406.00	16	2 434.00	30	2 462.00
3	2 408.00	17	2 436.00	31	2 464.00
4	2 410.00	18	2 438.00	32	2 466.00
5	2 412.00	19	2 440.00	33	2 468.00
6	2 414.00	20	2 442.00	34	2 470.00
7	2 416.00	21	2 444.00	35	2 472.00
8	2 418.00	22	2 446.00	36	2 474.00
9	2 420.00	23	2 448.00	37	2 476.00
10	2 422.00	24	2 450.00	38	2 478.00
11	2 424.00	25	2 452.00	39	2 480.00
12	2 426.00	26	2 454.00		
13	2 428.00	27	2 456.00		

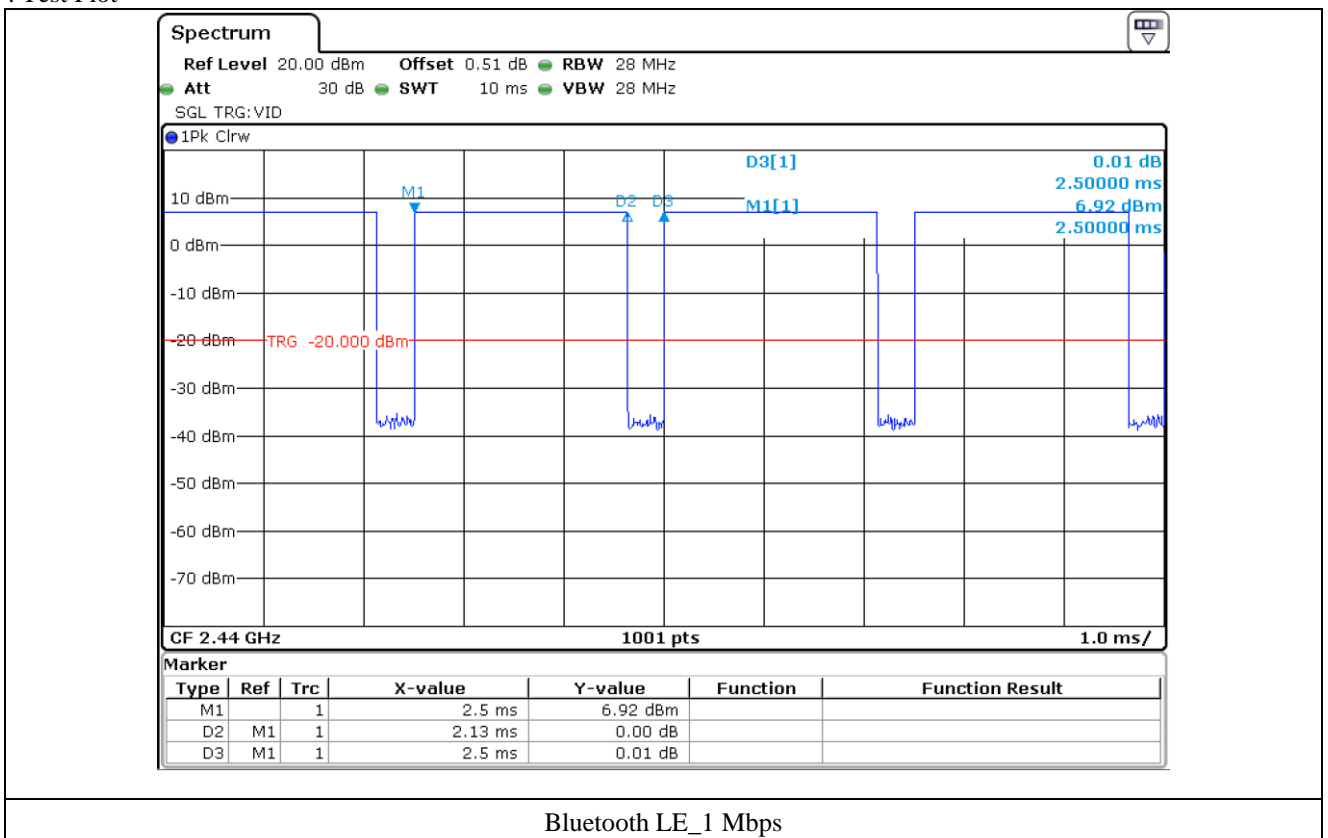
- Duty Cycle

Mode	Tx On Time [ms]	Tx Off Time [ms]	Duty Cycle [%]	Correction Factor [dB]
Bluetooth LE	2.13	0.37	85.2 %	0.70

Note – Duty Cycle : (Tx On Time / (Tx On Time + Tx Off Time)) * 100

Correction Factor : 10 * Log(1 / (Duty Cycle / 100))

- Test Plot



5.4 Configuration of Test System

Line Conducted Test: It is not need to test this requirement, because the EUT shall be operated by DC battery.

Radiated Emission Test: Preliminary radiated emissions test were conducted using the procedure in ANSI C63.10: 2020 to determine the worse operating conditions. Final radiated emission tests were conducted at 3 meter Semi Anechoic Chamber.

The turntable was rotated through 360 degrees and the EUT was tested by positioned three orthogonal planes to obtain the highest reading on the field strength meter. Once maximum reading was determined, the search antenna was raised and lowered in both vertical and horizontal polarization.

5.5 Antenna Requirement

For intentional device, according to section 15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device.

Antenna Construction:

The antenna of the EUT is a PCB Antenna on the main board in the EUT, so no consideration of replacement by the user.

6. PRELIMINARY TEST

6.1 AC Power line Conducted Emissions Tests

As this product is only using DC power, AC conducted emission test has not been performed.

6.2 General Radiated Emissions Tests

During Preliminary Test, the following operating mode was investigated.

Operation Mode	The Worse operating condition (Please check one only)
Transmitting Mode	X

7. MINIMUM 6 dB BANDWIDTH

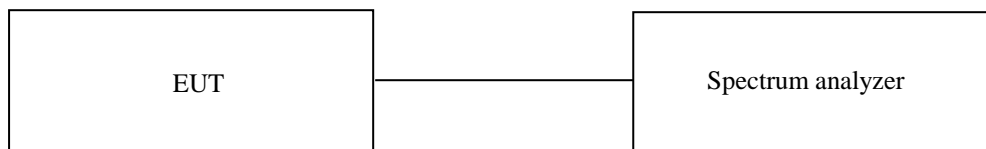
7.1 Operating environment

Temperature : 22 °C

Relative humidity : 46 % R.H.

7.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer. The resolution bandwidth is set to 100 kHz, and peak detection was used. The 6 dB bandwidth is defined as the total spectrum over which the power is higher than the peak power minus 6 dB.



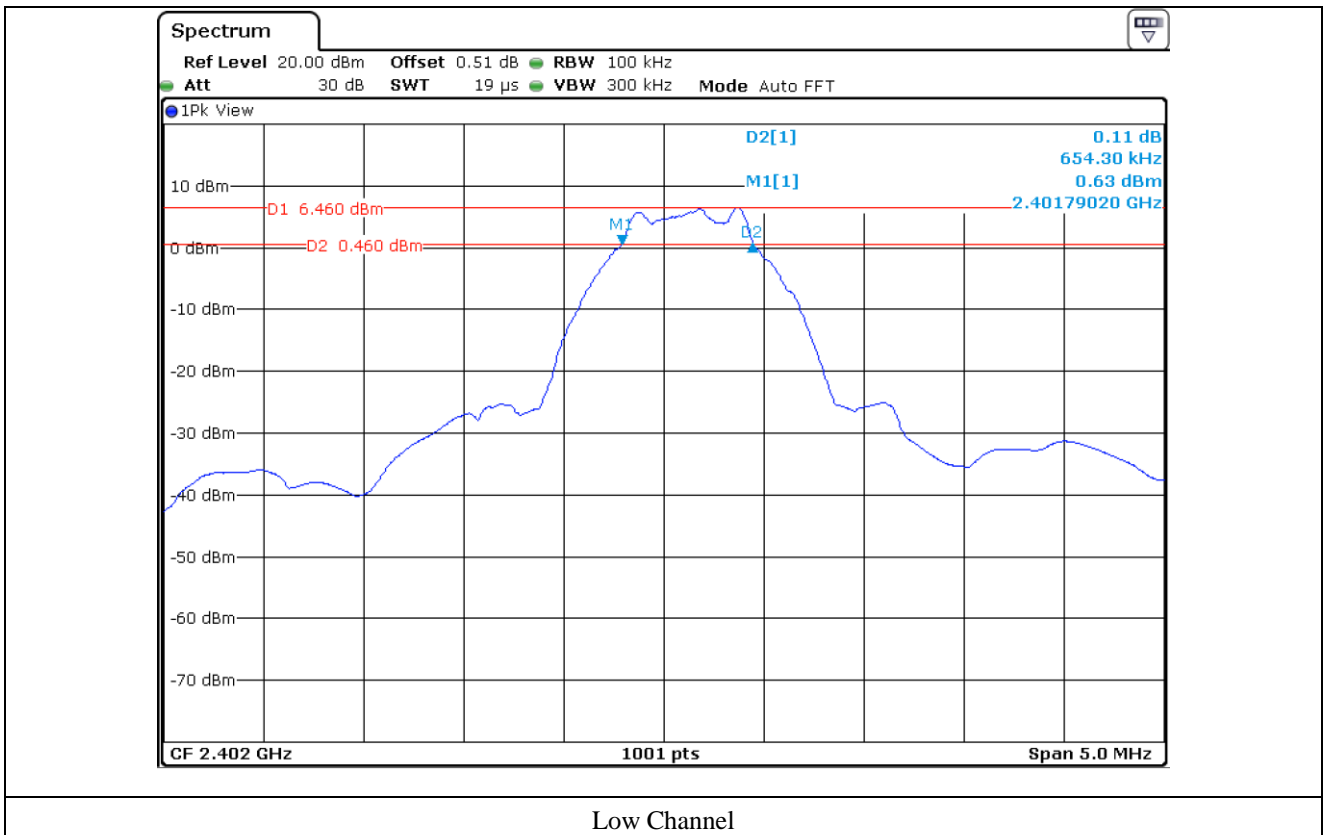
7.3 Test date

July 28, 2021 ~ August 03, 2021

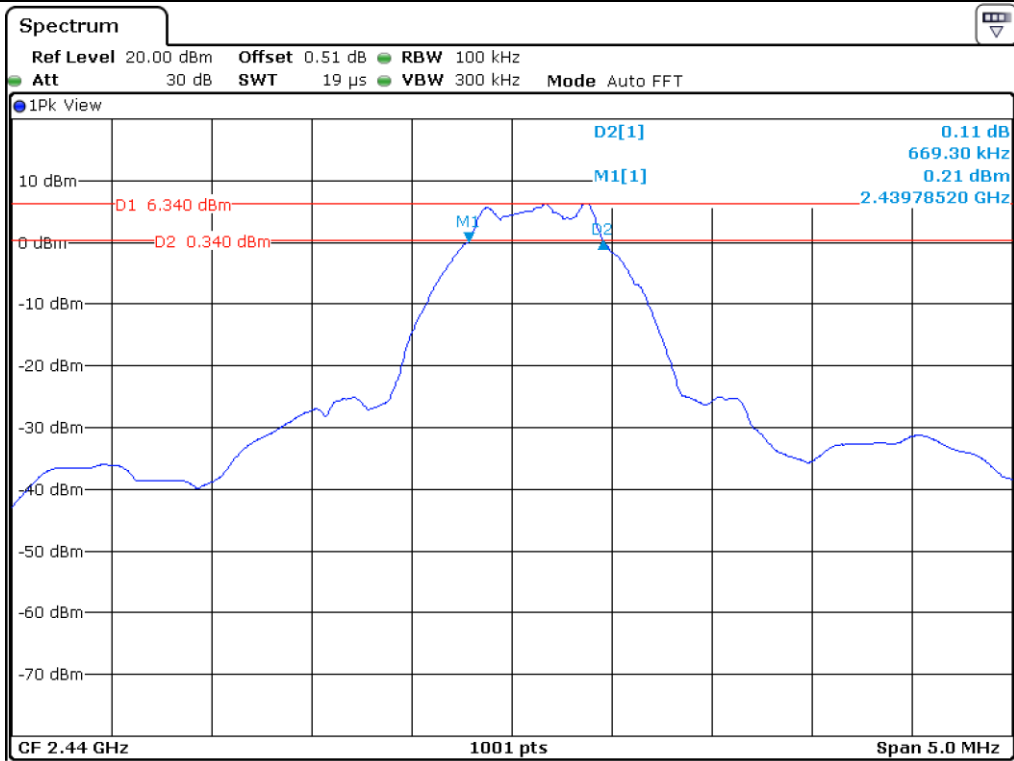
7.4 Test data

CHANNEL	FREQUENCY(MHz)	MEASURED VALUE (kHz)	LIMIT (kHz)	MARGIN (kHz)
Low	2 402.00	654.30	500.00	154.30
Middle	2 440.00	669.30	500.00	169.30
High	2 480.00	669.30	500.00	169.30

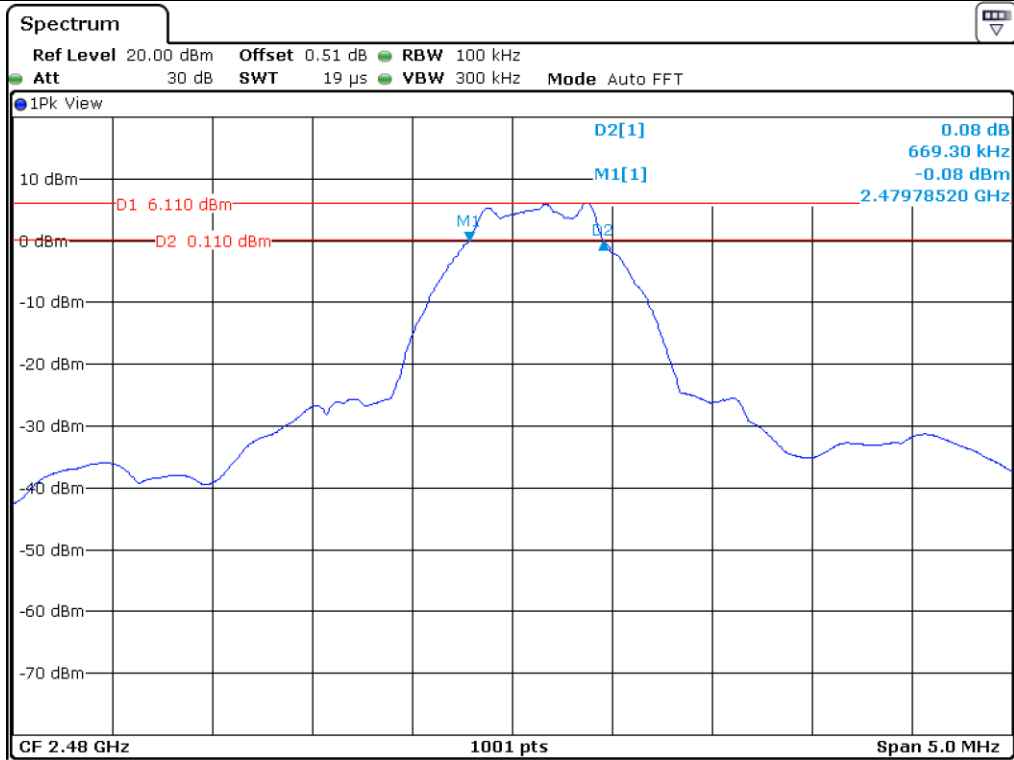
Remark. Margin = Measured Value - Limit



Low Channel



Middle Channel



High Channel

8. MAXIMUM PEAK OUTPUT POWER

8.1 Operating environment

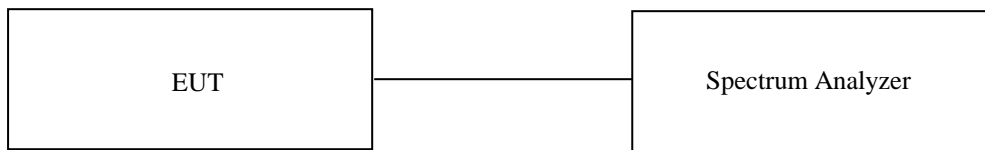
Temperature : 22 °C

Relative humidity : 46 % R.H.

8.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer.

The resolution bandwidth is set to \geq DTS Bandwidth, the video bandwidth is set to 3 times the resolution bandwidth.



8.3 Test date

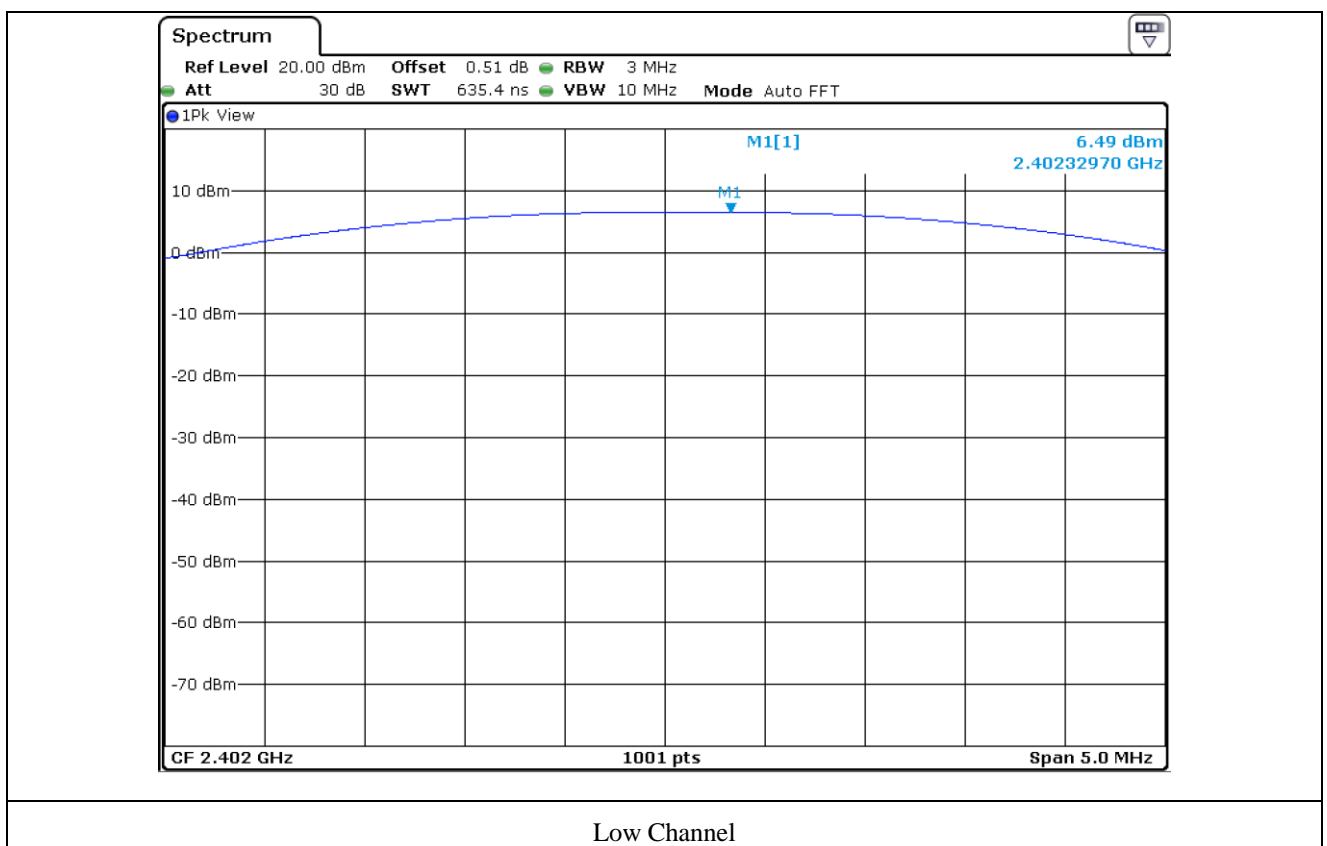
July 28, 2021 ~ August 03, 2021

8.4 Test data

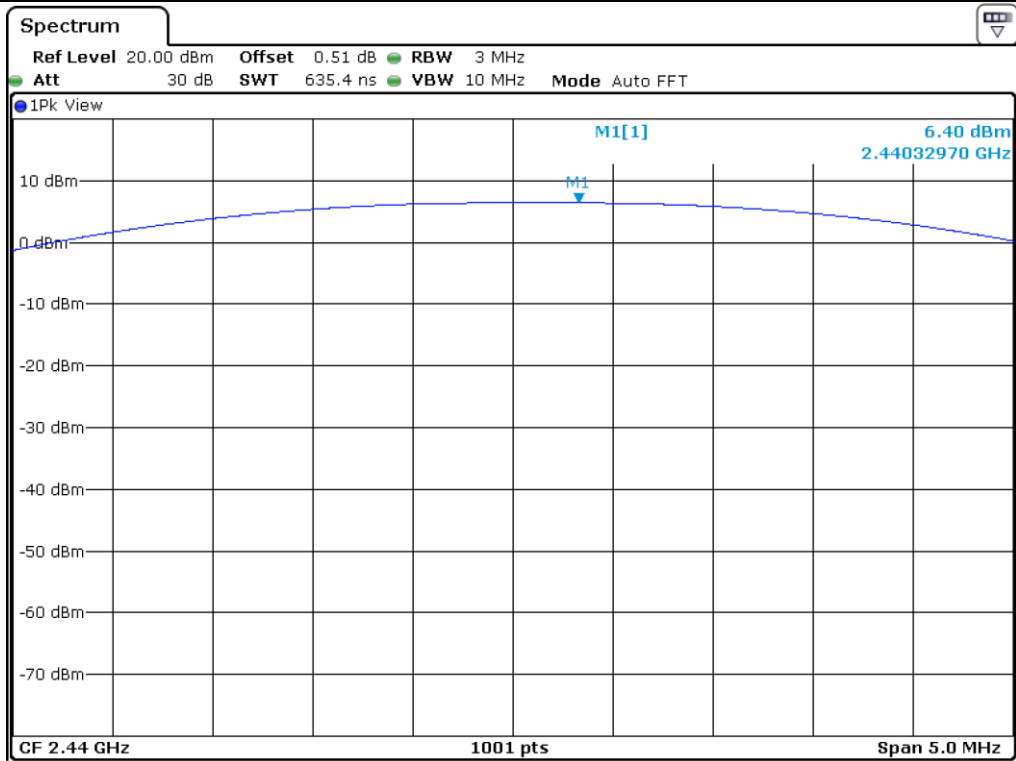
-. Test Result : Pass

CHANNEL	FREQUENCY (MHz)	MEASURED VALUE (dBm)	LIMIT (dBm)	MARGIN (dB)
LOW	2 402.00	6.49	30.00	23.51
MIDDLE	2 440.00	6.40	30.00	23.60
HIGH	2 480.00	6.17	30.00	23.83

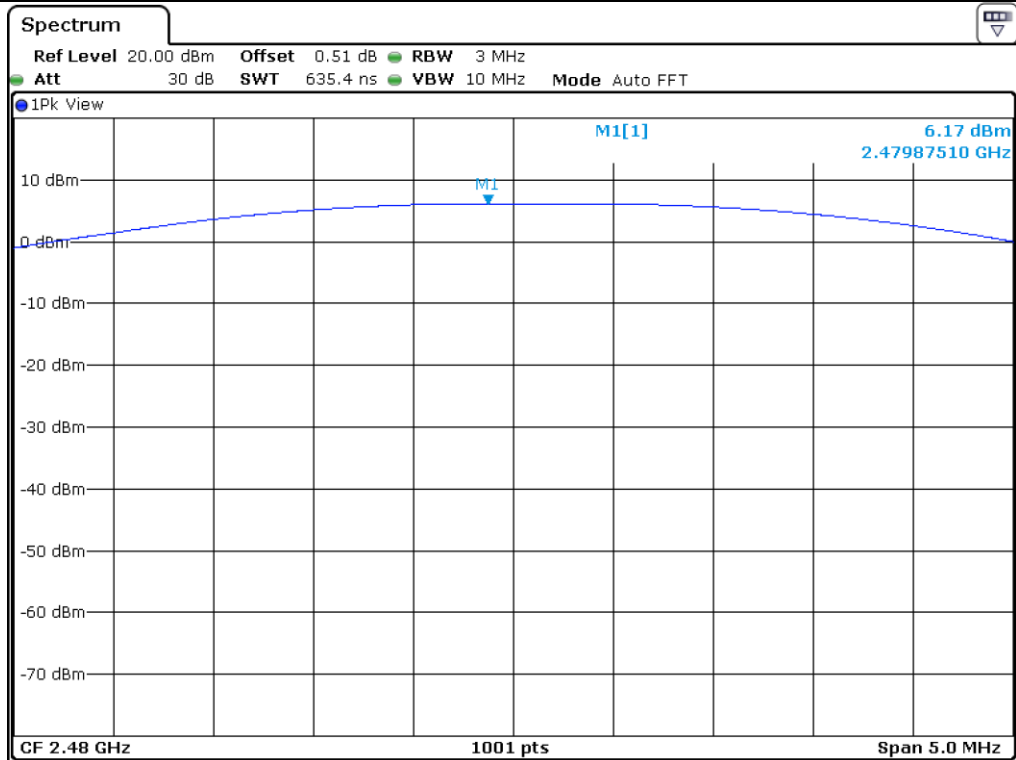
Remark. Margin = Limit – Measured Value (=Receiver Reading + Cable Loss)



Low Channel



Middle Channel



High Channel

9. 100 kHz BANDWIDTH OUTSIDE THE FREQUENCY BAND

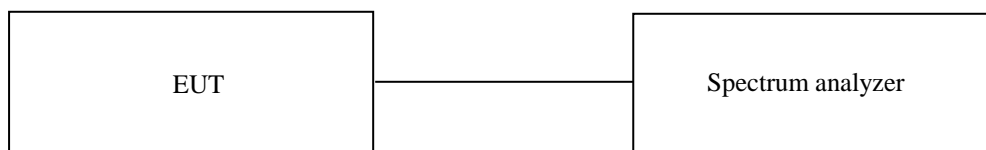
9.1 Operating environment

Temperature : 22 °C

Relative humidity : 46 % R.H.

9.2 Test set-up for conducted measurement

The antenna output of the EUT was connected to the spectrum analyzer. The resolution bandwidth is set to 100 kHz, the video bandwidth is set to 3 times the resolution bandwidth and peak detection was used.



9.3 Test set-up for radiated measurement

The radiated emissions measurements were performed on the 3 m semi anechoic chamber. The EUT was placed on turntable approximately 1.5 m above the ground plane.

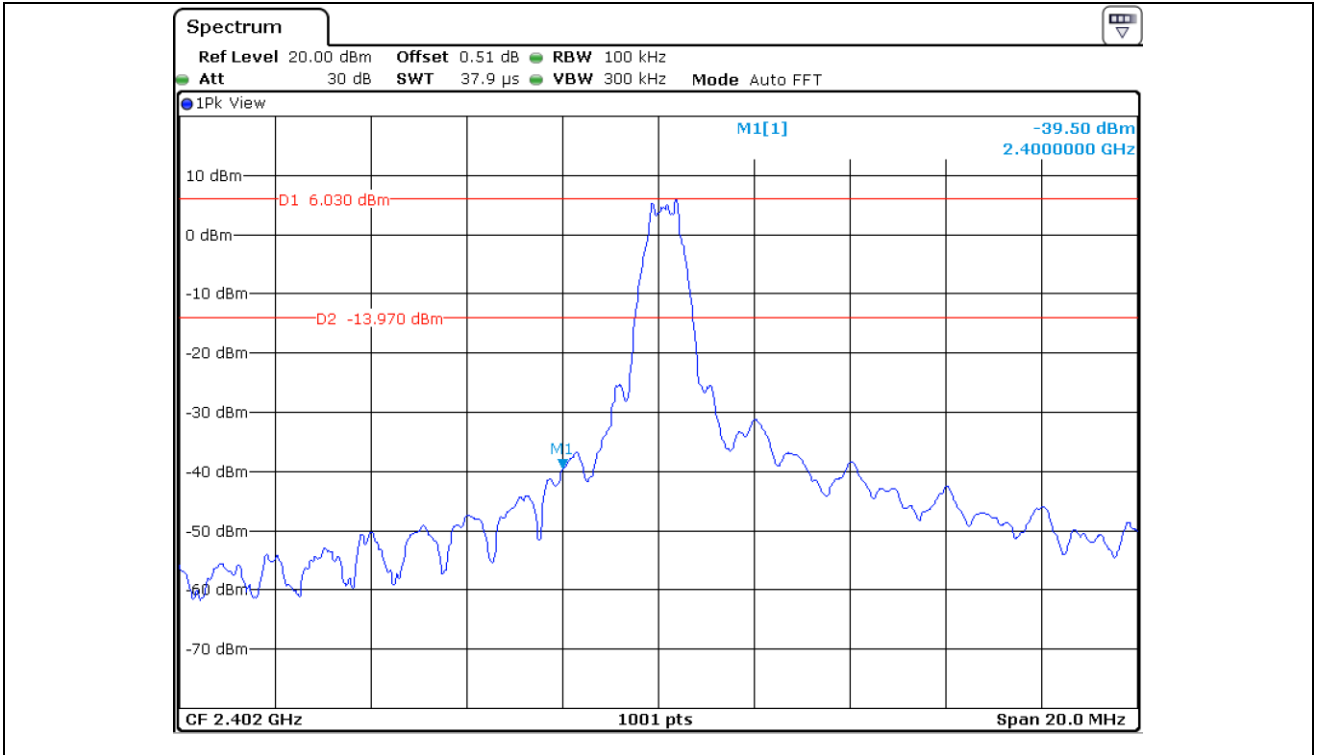
The frequency spectrum from 30 MHz to 26.5 GHz was scanned and maximum emission levels at each frequency recorded. The system was rotated 360°, and the antenna was varied in the height between 1.0 m and 4.0 m in order to determine the maximum emission levels. This procedure was performed for horizontal and vertical polarization of the receiving antenna.

9.4 Test date

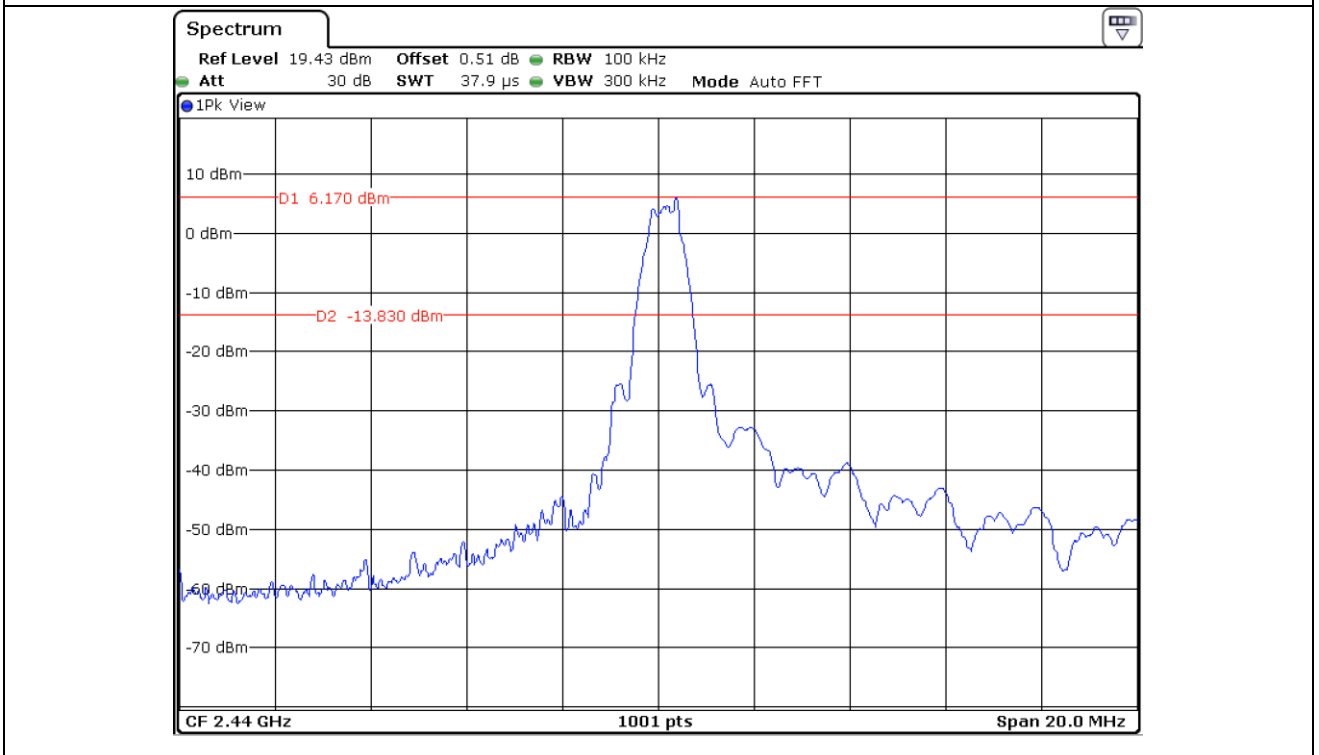
July 28, 2021 ~ August 03, 2021

9.5 Test data for conducted emission

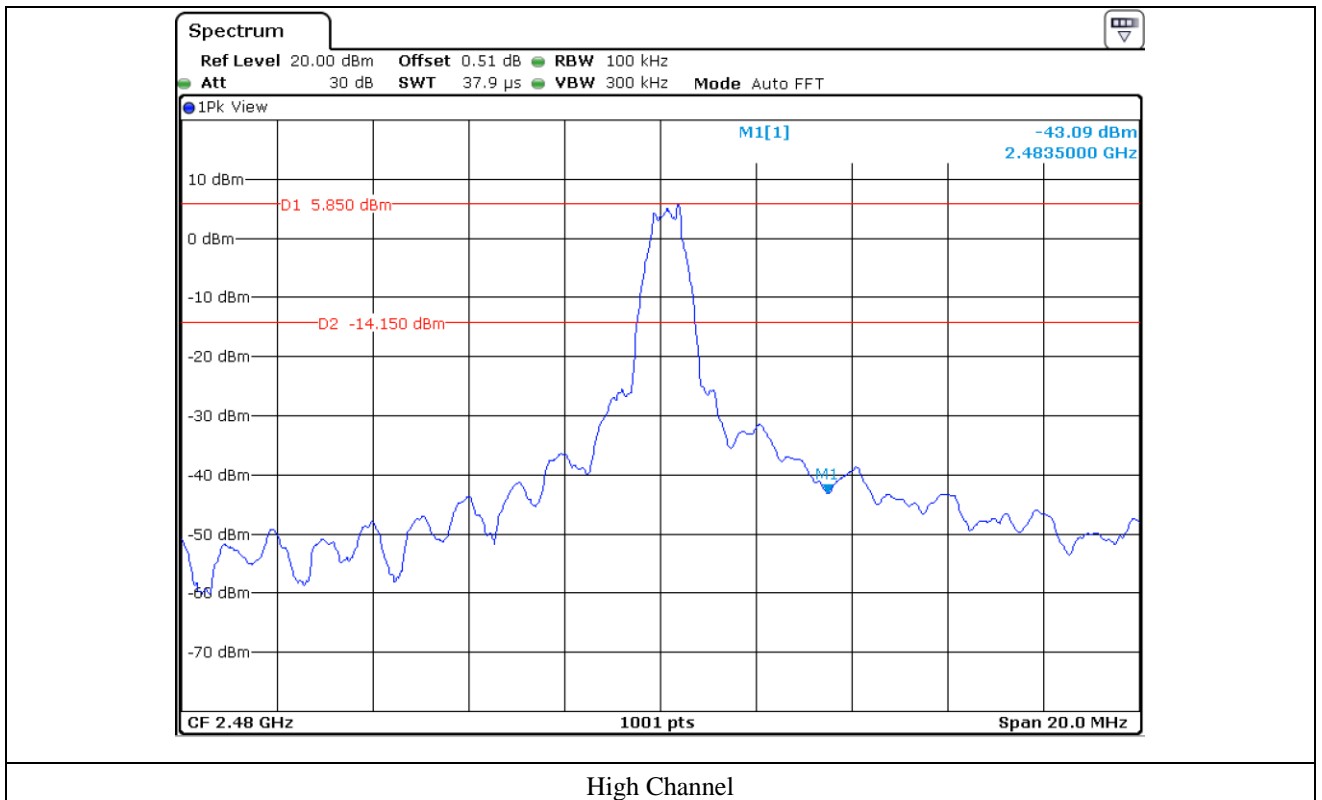
9.5.1 Test data

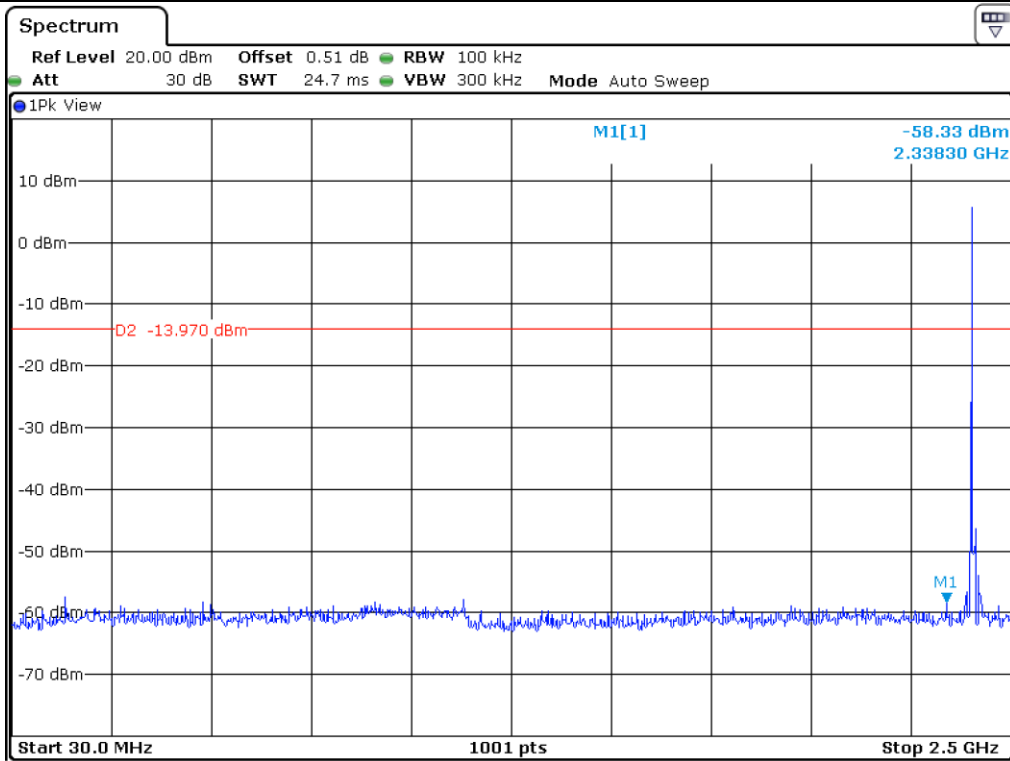


Low Channel

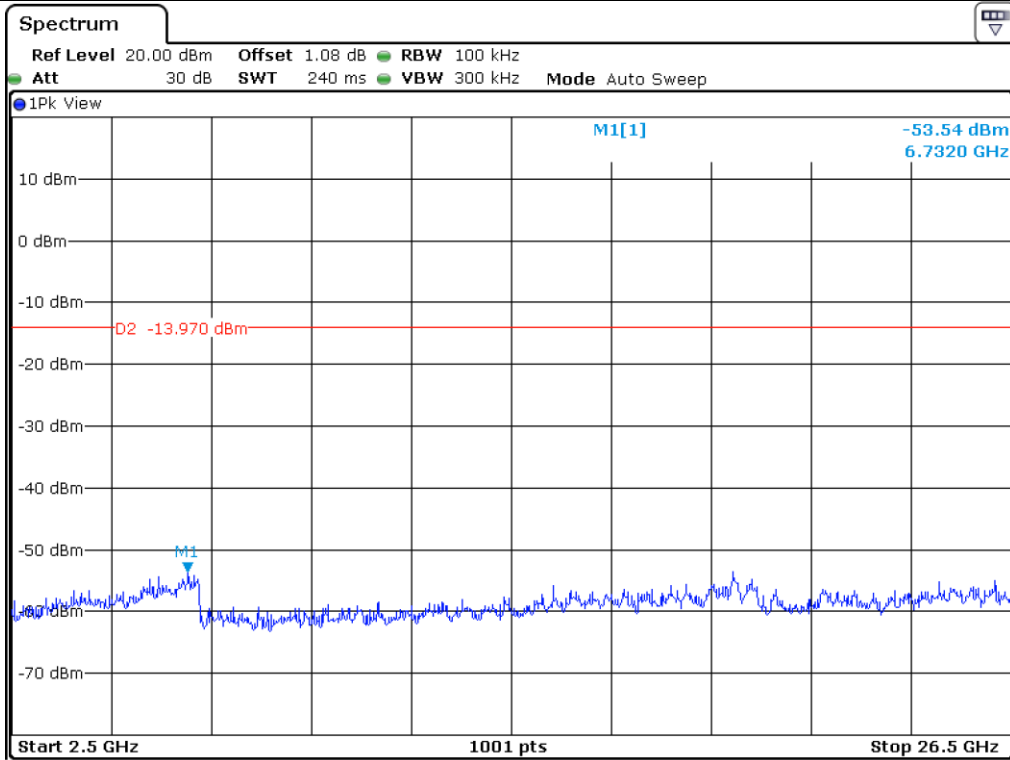


Middle Channel

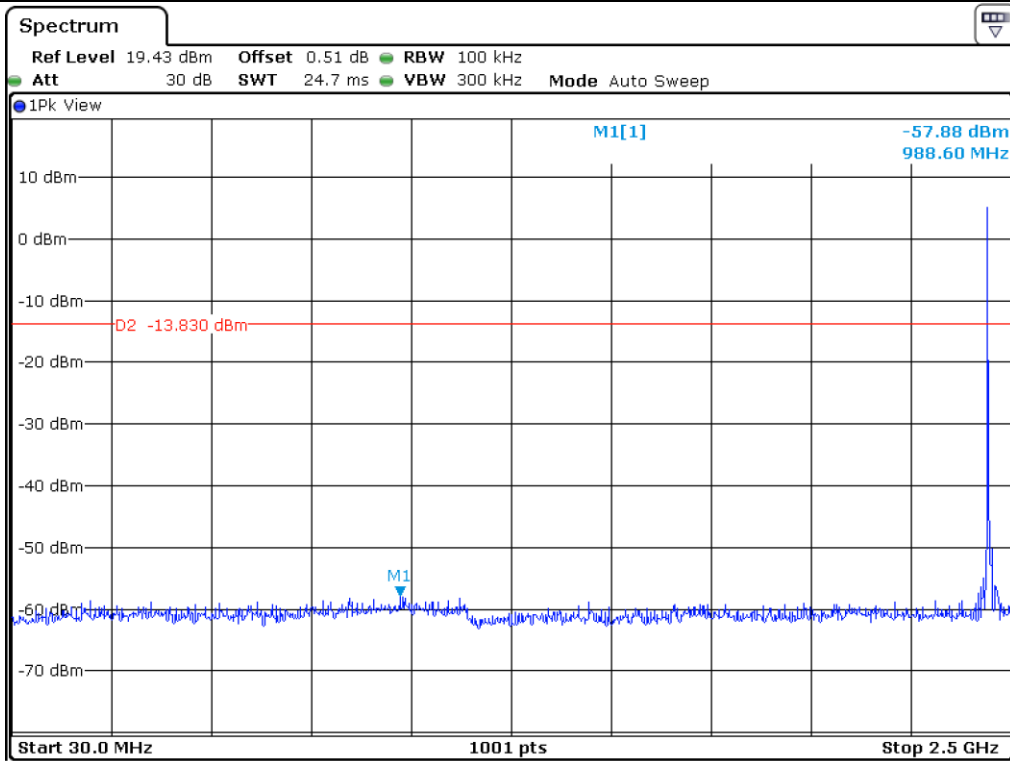




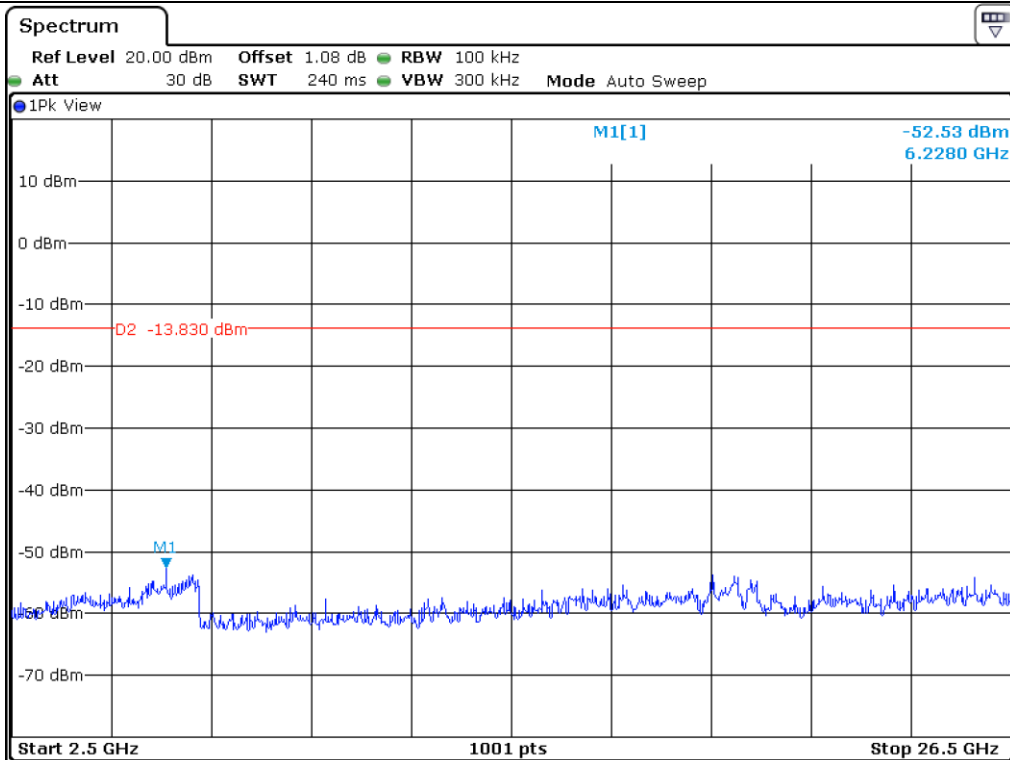
Low Channel



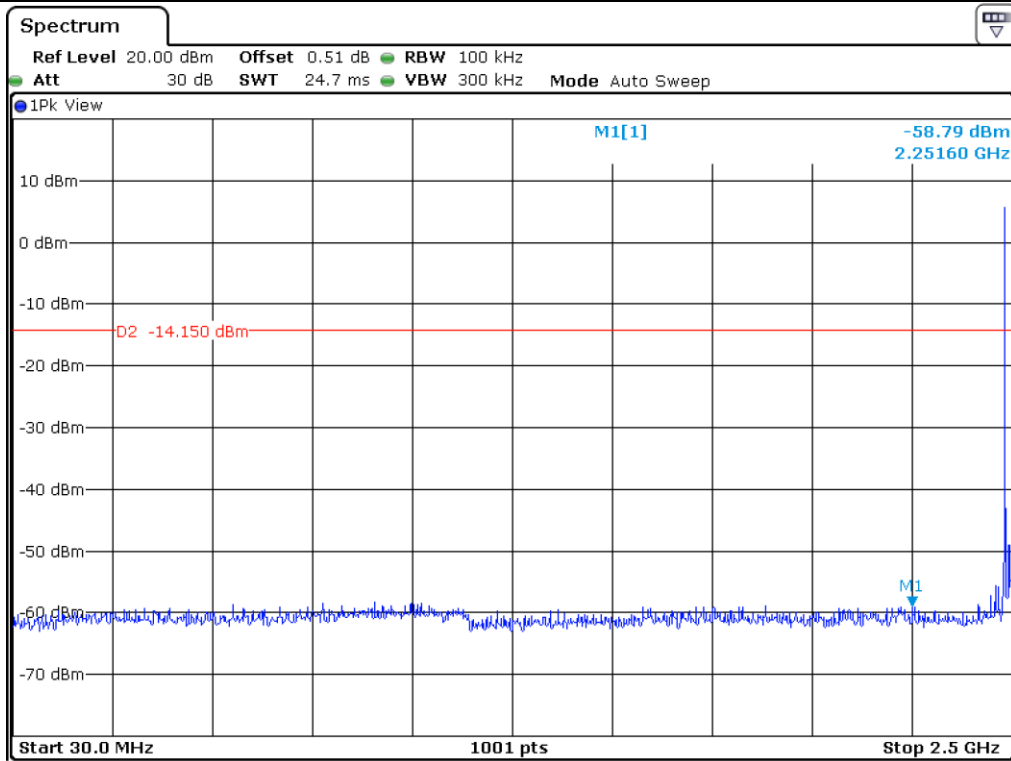
Low Channel



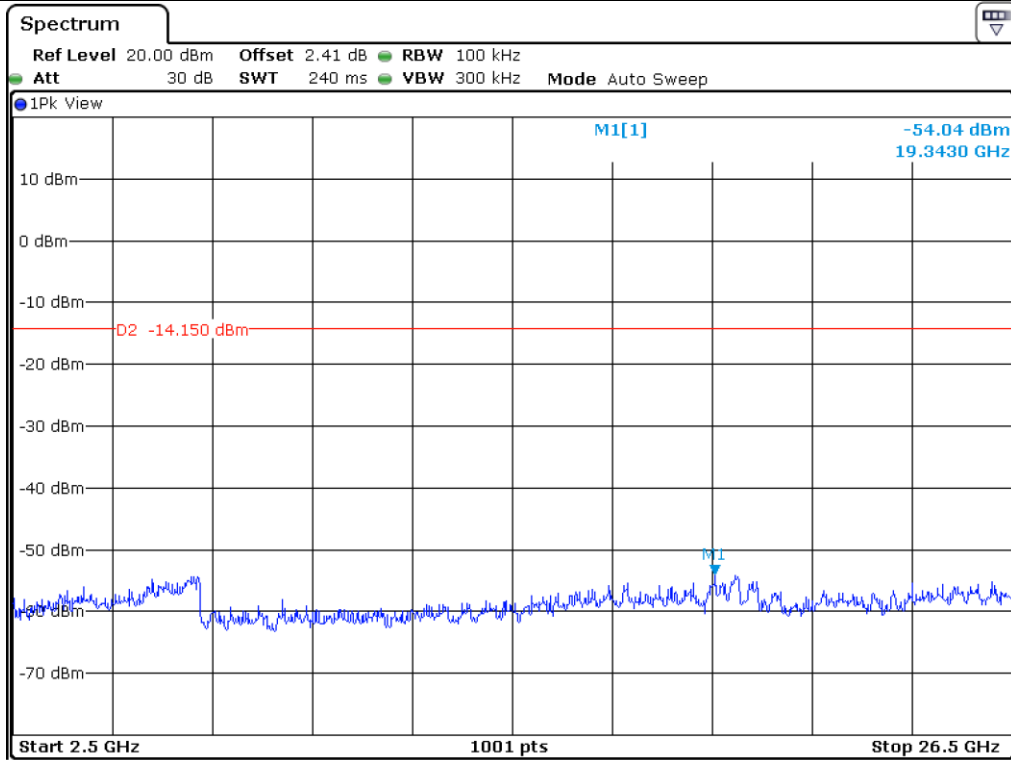
Middle Channel



Middle Channel



High Channel



High Channel

9.6 Test data for radiated emission

9.6.1 Radiated Emission which fall in the Restricted Band

- Resolution bandwidth : 1 MHz and Peak Detector for Peak Mode
1 MHz and RMS Detector for Average Mode
- Video bandwidth : 3 MHz for Peak and Average Mode
- Measurement distance : 3 m
- Duty Cycle : 85.2 %
- Result : PASSED

Frequency (MHz)	Reading (dBμV)	Detector Mode	Ant. Pol. (H/V)	Ant. Factor	Cable Loss	AMP Gain	Duty Factor (dB)	Total (dBμV/m)	Limits (dBμV/m)	Margin (dB)
Test Data for Low Channel										
2 356.18	52.63	Peak	H	28.30	5.39	46.90	-	39.42	74.00	34.58
2 385.87	41.95	Average	H	28.30	5.39	46.90	0.70	29.44	54.00	24.56
2 366.10	52.64	Peak	V	28.30	5.39	46.90	-	39.43	74.00	34.57
2 344.78	41.61	Average	V	28.30	5.39	46.90	0.70	29.10	54.00	24.90
Test Data for High Channel										
2 483.50	53.13	Peak	H	28.70	5.46	46.50	-	40.79	74.00	33.21
2 484.14	43.81	Average	H	28.70	5.46	46.50	0.70	32.17	54.00	21.83
2 483.50	58.13	Peak	V	28.70	5.46	46.50	-	45.79	74.00	28.21
2 483.50	44.92	Average	V	28.70	5.46	46.50	0.70	33.28	54.00	20.72

Tabulated test data for Restricted Band

Remark: “H”: Horizontal, “V”: Vertical

$$\text{Margin (dB)} = \text{Limits (dB}\mu\text{V/m)} - \text{Total Level (dB}\mu\text{V/m)}$$

$$\text{Total Level} = \text{Reading} + \text{Antenna Factor} + \text{Cable Loss} + \text{Correction Factor} - \text{AMP Gain}$$

9.6.2 Spurious & Harmonic Radiated Emission

- Resolution bandwidth : 1 MHz for Peak and Average Mode for the emissions fall in restricted band,
1 MHz for Peak Mode for the emissions outside restricted band
- Video bandwidth : 3 MHz for Peak and Average Mode
- Frequency range : 1 GHz ~ 26.5 GHz
- Measurement distance : 3 m
- Duty Cycle : 85.2 %
- Result : PASSED

Frequency (MHz)	Reading (dBμV)	Detector Mode	Ant. Pol. (H/V)	Ant. Factor	Cable Loss	AMP Gain	Duty Factor (dB)	Total (dBμV/m)	Limits (dBμV/m)	Margin (dB)
Test Data for Low Channel										
4 804.00	51.29	Peak	H	33.40	7.51	45.98	-	46.22	74.00	27.78
4 804.00	40.37	Average	H	33.40	7.51	45.98	0.70	36.00	54.00	18.00
4 804.00	50.25	Peak	V	33.40	7.51	45.98	-	45.18	74.00	28.82
4 804.00	40.45	Average	V	33.40	7.51	45.98	0.70	36.08	54.00	17.92
Test Data for Middle Channel										
4 880.00	50.39	Peak	H	33.50	7.51	46.05	-	45.35	74.00	28.65
4 880.00	40.38	Average	H	33.50	7.51	46.05	0.70	36.04	54.00	17.96
4 880.00	51.05	Peak	V	33.50	7.51	46.05	-	46.01	74.00	27.99
4 880.00	40.10	Average	V	33.50	7.51	46.05	0.70	35.76	54.00	18.24
Test Data for High Channel										
4 960.00	50.11	Peak	H	33.40	7.94	46.08	-	45.37	74.00	28.63
4 960.00	40.21	Average	H	33.40	7.94	46.08	0.70	36.17	54.00	17.83
4 960.00	50.31	Peak	V	33.40	7.94	46.08	-	45.57	74.00	28.43
4 960.00	40.10	Average	V	33.40	7.94	46.08	0.70	36.06	54.00	17.94

Remark: "H": Horizontal, "V": Vertical

$$\text{Margin (dB)} = \text{Limits (dB}\mu\text{V/m)} - \text{Total Level (dB}\mu\text{V/m)}$$

$$\text{Total Level} = \text{Reading} + \text{Antenna Factor} + \text{Cable Loss} + \text{Correction Factor} - \text{AMP Gain}$$

10. PEAK POWER SPECTRAL DENSITY

10.1 Operating environment

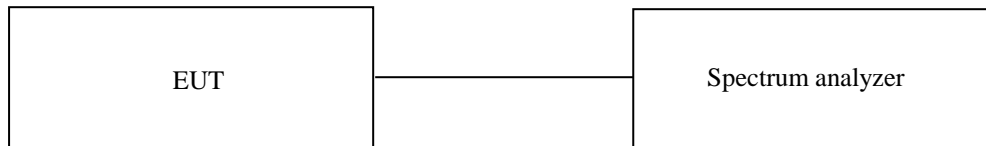
Temperature : 22 °C

Relative humidity : 46 % R.H.

10.2 Test set-up

The antenna output of the EUT was connected to the spectrum analyzer.

The resolution bandwidth is set to $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$, the video bandwidth is set to 3 times the resolution bandwidth.



10.3 Test date

July 28, 2021 ~ August 03, 2021

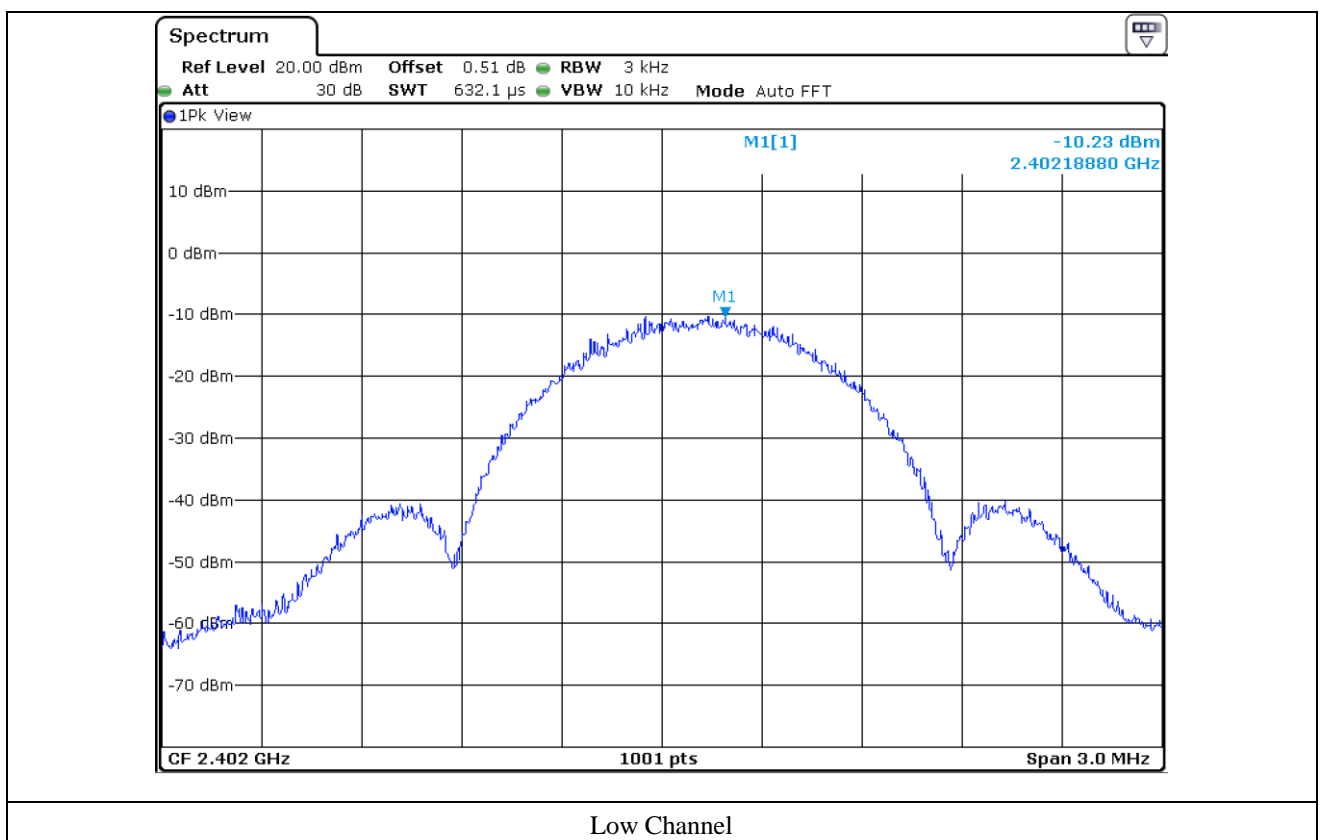
10.4 Test data

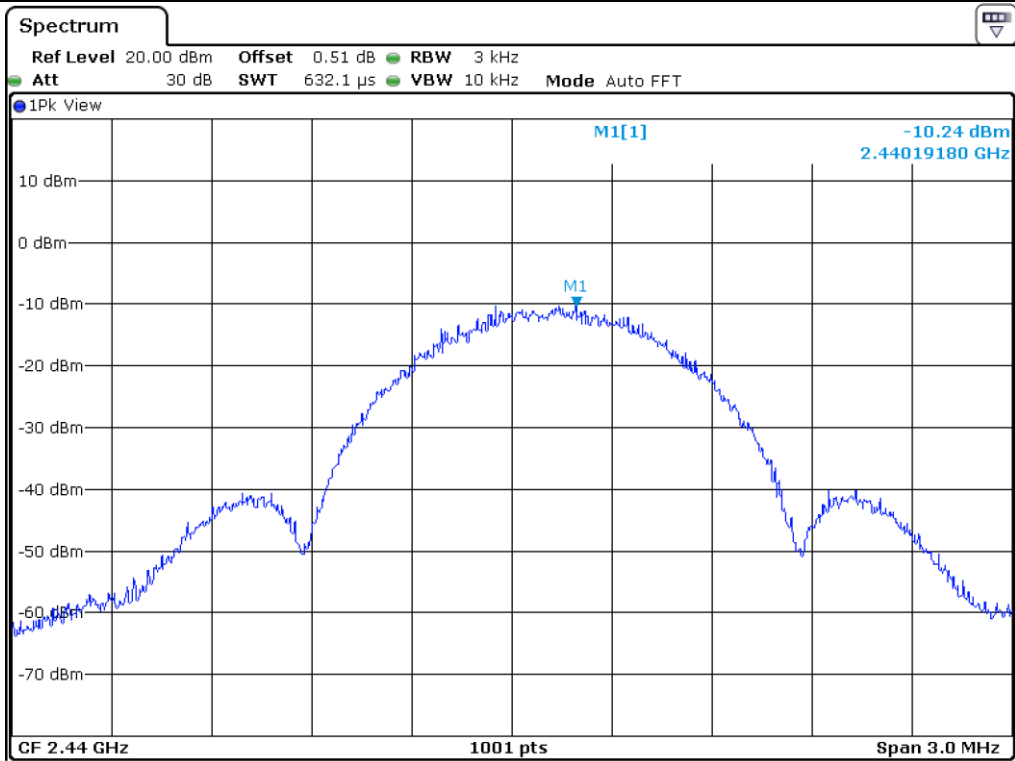
- Test Result : Pass

- Operating Condition : Continuous transmitting mode

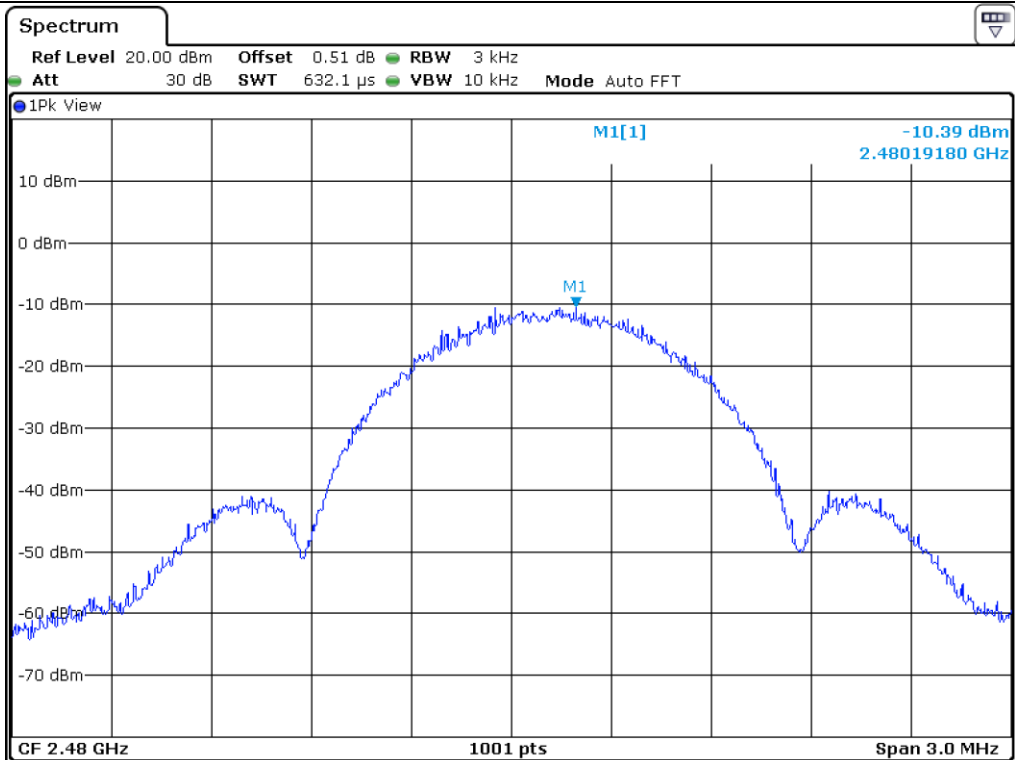
CHANNEL	FREQUENCY(MHz)	MEASURED VALUE (dBm)	LIMIT (dBm)	MARGIN (dB)
Low	2 402.00	-10.23	8.00	18.23
Middle	2 440.00	-10.24	8.00	18.24
High	2 480.00	-10.39	8.00	18.39

Remark. Margin = Limit – Measured value





Middle Channel



High Channel

11. RADIATED EMISSION TEST

11.1 Operating environment

Temperature : 22 °C
 Relative humidity : 46 % R.H.

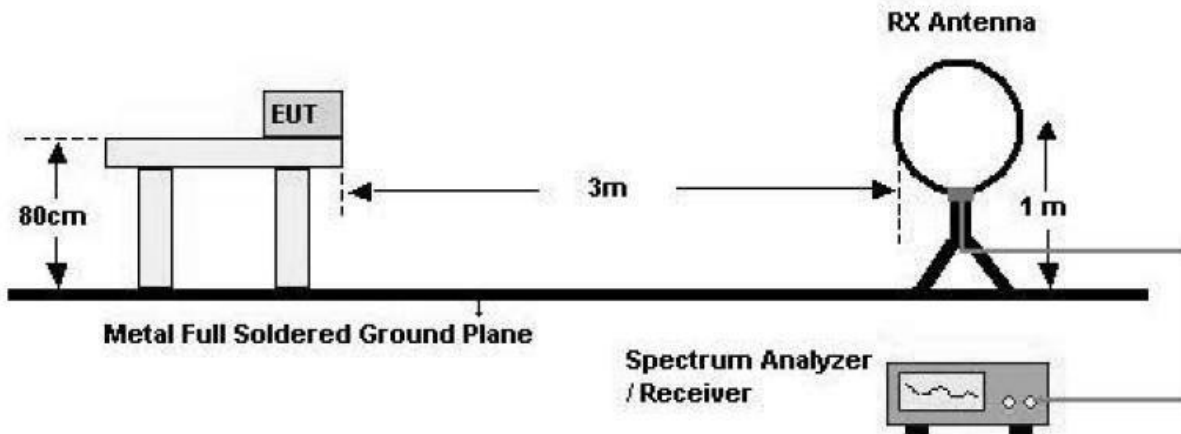
11.2 Test set-up

The radiated emissions measurements were on the 3 m semi anechoic chamber. The EUT and other support equipment were placed on a non-conductive turntable above the ground plane. The interconnecting cables from outside test site were inserted into ferrite clamps at the point where the cables reach the turntable.

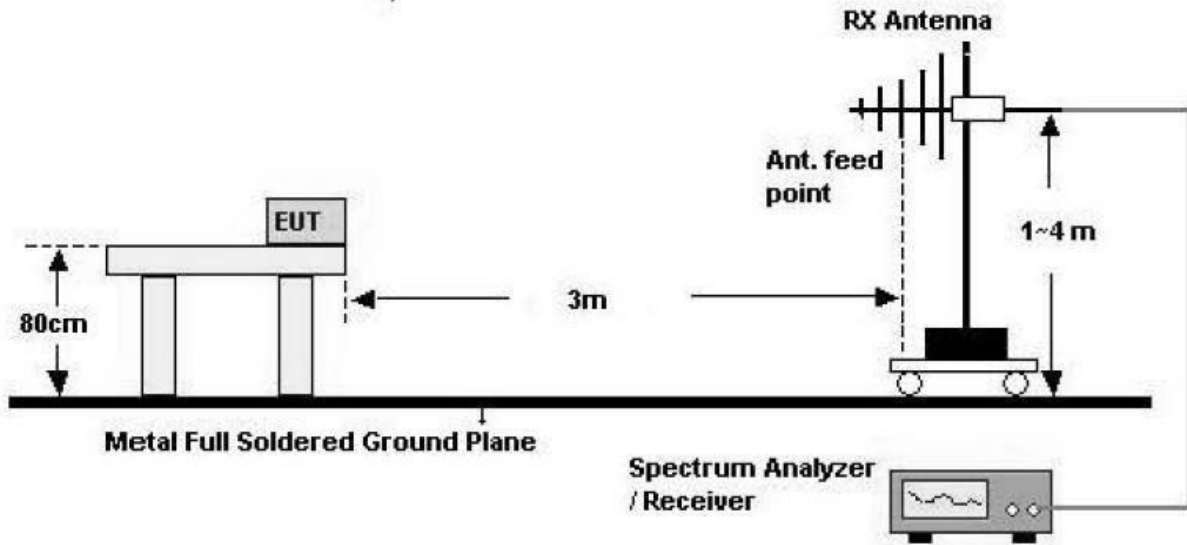
The frequency spectrum from 30 MHz to 26.5 GHz was scanned and emission levels maximized at each frequency recorded. The system was rotated 360°, and the antenna was varied in height between 1.0 m and 4.0 m in order to determine the maximum emission levels. This procedure was performed for both horizontal and vertical polarization of the receiving antenna.

- Test Configuration

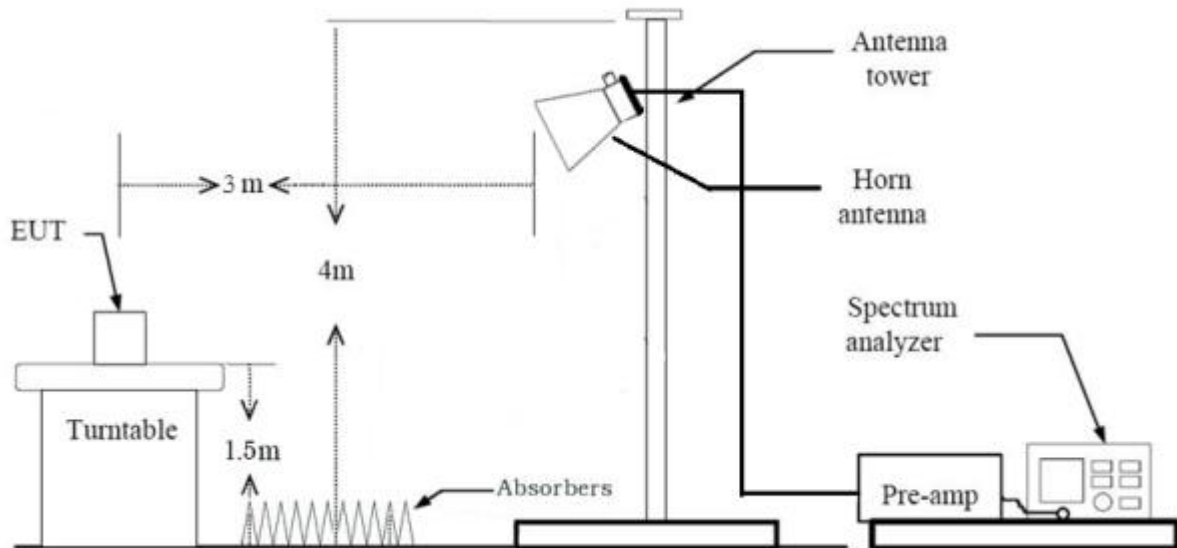
1. Below 30 MHz



2. 30 MHz - 1 GHz



3. Above 1 GHz



11.3 Test date

July 28, 2021 ~ August 03, 2021

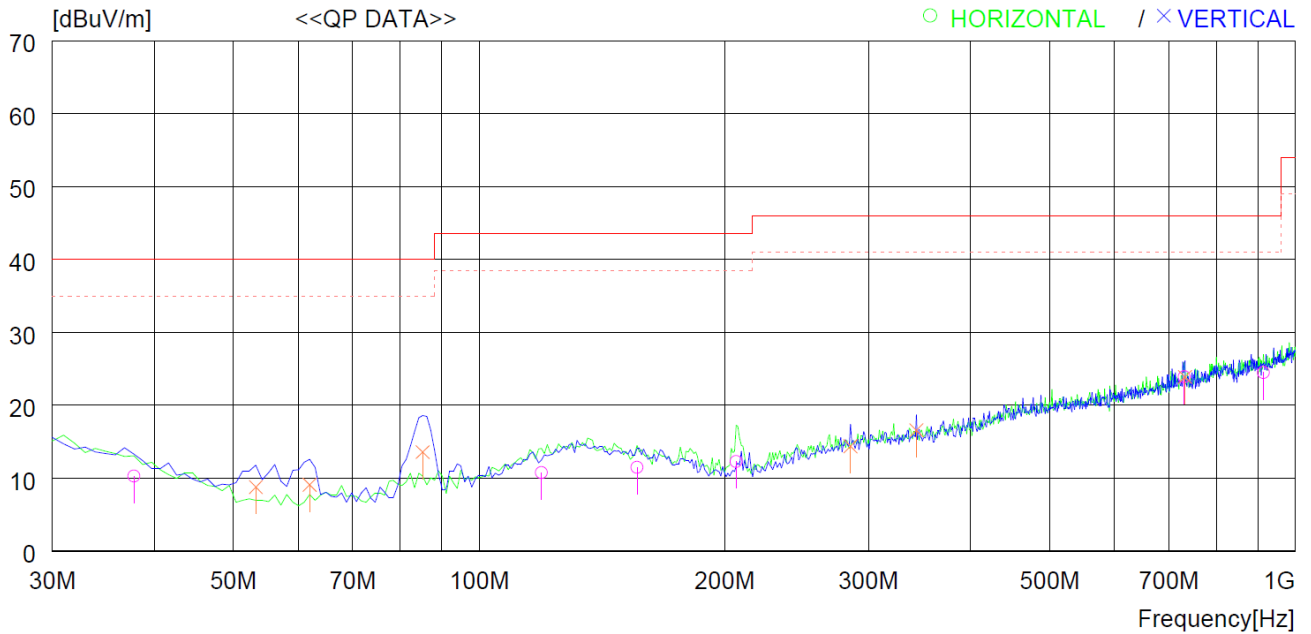
11.4 Test data for 30 MHz ~ 1 GHz

Limits apply to : FCC CFR 47, PART 15, SUBPART C, SECTION 15.247

Result : PASSED

EUT : Tracking Device

Detector : CISPR Quasi-Peak (6 dB Bandwidth: 120 kHz)



No.	FREQ [MHz]	READING QP [dBuV]	ANT FACTOR [dB]	LOSS [dB]	GAIN [dB]	RESULT [dBuV/m]	LIMIT [dBuV/m]	MARGIN [dB]	ANTENNA [cm]	TABLE [DEG]
----- Horizontal -----										
1	37.760	24.1	18.1	1.2	33.1	10.3	40.0	29.7	400	0
2	119.240	23.3	18.4	2.1	33.0	10.8	43.5	32.7	400	107
3	156.100	23.8	18.3	2.4	33.0	11.5	43.5	32.0	200	28
4	206.540	27.1	15.5	2.7	33.0	12.3	43.5	31.2	300	359
5	731.304	25.8	26.1	5.3	33.3	23.9	46.0	22.1	400	0
6	913.658	23.2	27.7	6.0	32.4	24.5	46.0	21.5	400	0
----- Vertical -----										
7	53.280	28.2	12.4	1.3	33.1	8.8	40.0	31.2	200	337
8	62.010	28.5	12.3	1.4	33.1	9.1	40.0	30.9	200	337
9	85.290	31.9	13.0	1.8	33.1	13.6	40.0	26.4	200	337
10	285.110	25.1	19.0	3.3	33.0	14.4	46.0	31.6	200	337
11	343.310	26.1	19.9	3.6	33.0	16.6	46.0	29.4	300	341
12	732.274	25.8	26.1	5.3	33.3	23.9	46.0	22.1	400	226

11.5 Test data for Below 30 MHz

- Resolution bandwidth : 200 Hz (from 9 kHz to 0.15 MHz), 9 kHz (from 0.15 MHz to 30 MHz)
- Frequency range : 9 kHz ~ 30 MHz
- Measurement distance : 3 m
- Operating mode : Transmitting mode

Frequency (MHz)	Reading (dBμV)	Ant. Pol. (H/V)	Ant. Height (m)	Angle (°)	Ant. Factor (dB/m)	Cable Loss	Emission Level(dBμV/m)	Limits (dBμV/m)	Margin (dB)
Emission from the EUT more than 20 dB below the limit in each frequency range.									

11.6 Test data for above 1 GHz

- Resolution bandwidth : 1 MHz for Peak and Average Mode for the emissions fall in restricted band,
1 MHz for Peak Mode for the emissions outside restricted band
- Video bandwidth : 3 MHz for Peak and Average Mode
- Frequency range : 1 GHz ~ 26.5 GHz
- Measurement distance : 3 m
- Operating mode : Transmitting mode

Frequency (MHz)	Reading (dBμV)	Ant. Pol. (H/V)	Ant. Height (m)	Angle (°)	Ant. Factor (dB/m)	Cable Loss	Emission Level(dBμV/m)	Limits (dBμV/m)	Margin (dB)
Emission from the EUT more than 20 dB below the limit in each frequency range.									

12. LIST OF TEST EQUIPMENT

Model Number	Manufacturer	Description	Serial Number	Last Cal.(Interval)
FSV40	Rohde & Schwarz	Signal Analyzer	101009	Feb. 09, 2021 (1Y)
ESW	Rohde & Schwarz	EMI Test Receiver	101851	Mar. 23, 2021 (1Y)
310N	Sonoma Instrument	Pre-Amplifier	392756	Oct. 16, 2020 (1Y)
SCU18	Rohde & Schwarz	Signal Conditioning unit	102266	Jul. 14, 2021 (1Y)
SCU40A	Rohde & Schwarz	Signal Conditioning unit	100436	Feb. 08, 2021 (1Y)
DT3000-3t	Innco System	Turn Table	DT3000/093	N/A
MA-4000XPET	Innco System	Antenna Master	MA4000/509	N/A
CO3000	Innco Systems GmbH	Controller	N/A	N/A
VULB9168	Schwarzbeck	Hybrid Antenna	01088	Dec. 09, 2019 (2Y)
AH-118	Com-Power	Horn Antenna	10050061	Oct. 15, 2020 (1Y)
VULB9163	Schwarzbeck	TRILOG Broadband Antenna	777	Apr. 08, 2020 (2Y)
BBHA9120D	Schwarzbeck	Horn Antenna	9120D-1366	Jul. 20, 2021 (1Y)
BBHA9170	Schwarzbeck	Horn Antenna	BBHA9170178	Jan. 07, 2021 (1Y)
FMZB 1513	Schwarzbeck	Loop Antenna	1513-235	Mar. 24, 2020 (2Y)