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**Test report no.:**  
220262-AU01+W05

**for:**  
Elatec GmbH  
RFID reader / writer module  
TWN4 Lepto M

**according to:**  
47 CFR Part 15, §15.225  
RSS-210



Deutsche  
Akkreditierungsstelle  
D-PL-12155-01-04



Deutsche  
Akkreditierungsstelle  
D-PL-12155-01-03

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Department of Innovation, Science and Economic Development Canada (ISED)  
as a recognized testing laboratory  
CAB identifier: DE0011  
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# 1 Summary of test results

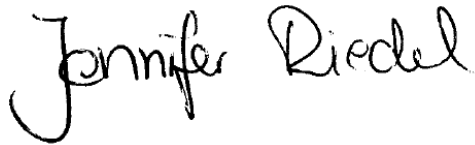
System type: RFID Reader

<i>47 CFR part and section</i>	<i>Test</i>	<i>Equivalent to IC radio standard(s)</i>	<i>Page</i>	<i>Result</i>	<i>Note(s)</i>
15.207(a)	AC powerline conducted emissions	RSS-Gen, section 8.8	24	Passed	2
15.215(c)	20 dB bandwidth	---	28	Passed	---
---	Occupied bandwidth	RSS-Gen, section 6.7	31	Recorded	---
15.225 (a) – (c)	Operation within the band 13.110 MHz – 14.010 MHz	RSS-210 section B.6 (a) I-III	33	Passed	---
15.225(e)	Carrier frequency stability	RSS-210, section B.6 (b)	36	Passed	---
15.225(d)	Emissions below 30 MHz outside the operating frequency band(s) specified	RSS-210, section B.6 (a) IV	39	Passed	---
15.225(d)	Spurious emissions from 30 MHz to 1 GHz	RSS-210, section B.6 (a) IV	42	Passed	---
15.225(d)	Spurious emissions above 1 GHz	RSS-210, section B.6 (a) IV	45	Passed	3, 4

Note(s):

- 1 For information about EUT see clause 3.
- 2 Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.
- 3 Not applicable if the 10<sup>th</sup> harmonic of the intentional transmitter is beyond 1 GHz (please see 47 CFR Part 15, section 15.33(a)(1), and RSS-Gen, section 6.13.2(a))
- 4 According to 47 CFR Part 15, §15.33 (a)(5) and RSS-Gen, section 6.13.2 (d), the frequency range of investigation for the digital device shall be used if the range of investigation determined by the highest internal frequency of the digital device is higher than the 10<sup>th</sup> harmonic of the intentional radiator

Straubing, July 25, 2022



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Tested by  
Jennifer Riedel B. Eng.  
Radio Test Engineer



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Approved by  
Konrad Graßl  
Department Manager Radio

## 2 Referenced publications

<i>Publication</i>	<i>Title</i>
CFR 47 Part 2 October 2021	Code of Federal Regulations, Title 47 (Telecommunication), Part 2 (Frequency allocation and radio treaty matters; General rules and regulations) of the Federal Communication Commission (FCC)
CFR 47 Part 15 October 2021	Code of Federal Regulations, Title 47 (Telecommunication), Part 15 (Radio Frequency Devices) of the Federal Communication Commission (FCC)
ANSI C63.10 June 2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
KDB 174176 D01 June 3, 2015	AC power-line conducted emissions Frequently Asked Questions
RSS-Gen Issue 5 April 2018 Amendment 1 (March 2019) Amendment 2 (February 2021)	Spectrum Management and Telecommunications - Radio Standards Specification - General Requirements for Compliance of Radio Apparatus
RSS-210 Issue 10, December 2019 Amendment (April 2020)	Spectrum Management and Telecommunications Radio Standards Specification Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment

### 3 Equipment under test (EUT)

All Information in this clause is declared by customer.

#### 3.1 General information

Product type:	RFID reader / writer module		
Model name:	TWN4 Lepto M		
Serial number(s):	2022197940		
Manufacturer:	Elatec GmbH		
Version:	Hardware:	B	
	Software:	B1.08/NKF4.06/STDC2.04	
Short description:	EUT is a RFID reader / writer module operating at the frequency 13.56 MHz. The EUT also employs 125 kHz and BLE which are in consideration in other test reports.		
Additional modifications:	None		
FCC ID:	WP5TWN4F18		
IC registration number:	7948A-TWN4F18		
Emission designator:	1K59K1D--		
Power supply:	DC supply		
	Nominal voltage:	5 V	
	Minimum voltage:	4.3 V	
	Maximum voltage:	5.5 V	
Temperature range:	-25 °C to +80 °C (customer defined)		
Device type:	<input checked="" type="checkbox"/> Portable	<input type="checkbox"/> Mobile	<input type="checkbox"/> Fixed



### 3.2 Radio specifications

System type:	RFID Reader		
Application frequency band:	13.110 MHz – 14.010 MHz		
Operating frequencies:	13.56 MHz		
Number of RF channels	1		
Highest internal frequency:	120 MHz		
Modulation	ASK		
Antenna:	Type:	Loop antenna	
	Connector:	<input type="checkbox"/> external	<input type="checkbox"/> internal
		<input type="checkbox"/> temporary	<input checked="" type="checkbox"/> none (integral antenna)

### 3.3 Photo documentation

For internal photos see annex C.

Photos taken during testing including EUT positions can be found in annex A.

## 4 Test configuration and mode of operation

### 4.1 Test configuration

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID reader / writer module	TWN4 Lepto M	2022197940	Elatec GmbH

Table 1: EUT used for testing

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID-tag	13.56 MHz	---	Elatec GmbH
Laptop	Lifebook A531	E001053	FUJITSU
Power supply for laptop	AC adapter	E001053	FUJITSU
Power supply	3231.1	E01235	Statron
USB measurement box	USB measurement box	SEB01231	ELEMENT STRAUBING

Table 2: Support equipment used for testing

### 4.2 Mode of operation

The EUT was in continuous interrogation mode at 13.56 MHz.

## 5 Test procedures

### 5.1 General specifications

#### 5.1.1 Test setups

Tabletop devices are placed on a non-conductive table with a height of 0.8 m. In case of AC power-line conducted emissions test, the rear of the EUT is located 40 cm to the vertical wall of the RF-shielded (screened) room which is used as vertical conducting plane. For radiated emission measurements above 1 GHz, tabletop devices are placed at a height of 1.5 m above the floor using a support made of styrene placed on top of the non-conductive table.

Floor-standing devices are placed either directly on the reference ground-plane or on insulating material (see clause 6.2.3 of ANSI C63.10-2013 for more details).

All other surfaces of tabletop or floor-standing EUTs are at least 80 cm from any other grounded conducting surface. This includes the case or cases of one or more LISNs when performing an AC power-line conducted emissions test.

Radiated emission measurements of equipment that can be used in multiple orientations (e.g. portable or handheld devices) are performed with the EUT in each of three orthogonal axis positions.

### 5.2 AC power line conducted emission

AC power-line conducted emissions are measured according to clause 6.2 of ANSI C63.10 over the frequency range from 150 kHz to 30 MHz to determine the line-to-ground radio-noise voltage that is conducted from all of the EUT current-carrying power input terminals that are directly (or indirectly via separate transformers or power supplies) connected to a public power network. The tests are performed in a shielded room.

If the EUT normally receives power from another device that in turn connects to the public utility ac power lines, measurements are made on that device with the EUT in operation to demonstrate that the device continues to comply with the appropriate limits while providing the EUT with power. If the EUT is operated only from internal or dedicated batteries, with no provisions for connection to the public utility ac power lines (600 VAC or less) to operate the EUT (such as an adapter), then ac power-line conducted measurements are not required.

For direct current (dc) powered devices where the ac power adapter is not supplied with the device, an “off-the-shelf” unmodified ac power adapter is used. If the device is supposed to be installed in a host (e.g., the device is a module or PC card), then it is tested in a typical compliant host.

<i>Frequency (f)</i>	<i>Measurement receiver bandwidth</i>	<i>Step size</i>	<i>Detector type</i>		
			<i>Prescan</i>	<i>Prescan with FFT</i>	<i>Final scan</i>
150 kHz ≤ f < 30 MHz	9 kHz	≤ 4.5 kHz	Peak, Average	Quasi-peak, Average	Quasi-peak, Average

Table 3: Bandwidth and detector type for AC power-line conducted emissions test

The AC power-line conducted emissions test is performed in the following steps:

- a) The EUT is arranged as tabletop or floor-standing equipment, as applicable, and connected to a line impedance stabilization network (LISN) with 50 μH / 50 Ω. If required, a second LISN of the same type and terminated by 50 Ω is used for peripheral devices. The EUT is switched on.

- b) The measurement equipment is connected to the LISN for the EUT and set-up according to the specifications of the test (see table 3). At the LISN, the neutral line is selected to be tested.
- c) The prescan is performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescan, but not for final scan.
- d) When the prescan is completed, maximum levels with less margin than 10 dB or exceeding the limit are determined and collected in a list.
- e) With the first frequency of the list selected, a frequency zoom over a range of ten times of the measurement receiver bandwidth around this frequency is performed. If the EUT has no significant drift in frequency, the frequency zoom can be skipped.
- f) For final scan, the emission level is measured and the maximum is recorded.
- g) Steps e) to f) are repeated for all other frequencies in the list. At least the six highest EUT emissions relative to the limit have to be recorded.
- h) Steps c) to g) are repeated for all current-carrying conductors of all of the power cords of EUT, i.e. all phase and (if used) neutral line(s).

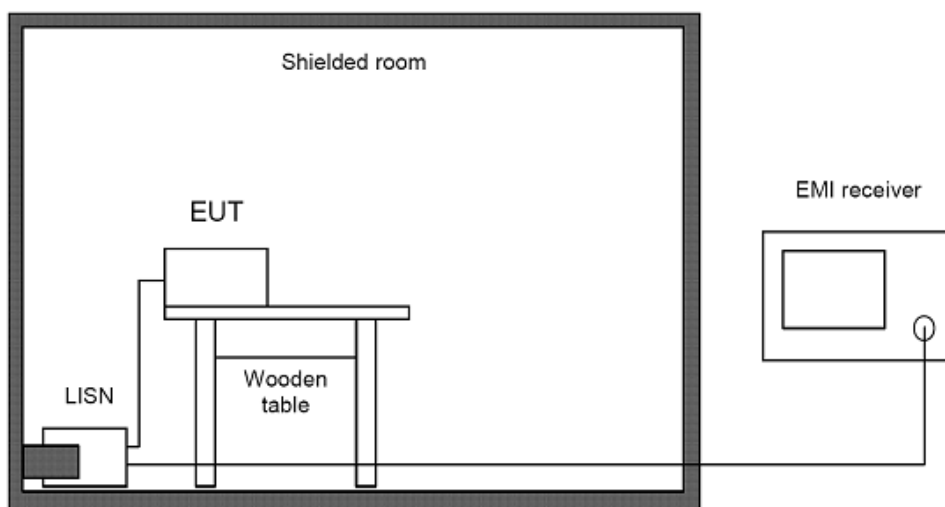


Figure 1: Setup for AC power-line conducted emissions test from 150 kHz to 30 MHz

Phase	Frequency (MHz)	Reading value (dBµV)	AMN correction (dB)	Cable attenuation + 10 dB attenuator (dB)	Correction factor (Corr.) (dB)	Level (dBµV)
L 1	10	10	0.6	10.9	11.5	21.5
N	10	10	1.0	10.9	11.9	21.9

Table 4: Sample calculation

Correction factor = Artificial mains network correction + Cable attenuation + 10 dB

Level = Reading value + Correction factor = 10 dBµV + 11.5 dB = 21.5 dBµV

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

### 5.3 Radiated emissions below 30 MHz

Radiated emissions below 30 MHz are measured according to clause 6.4 of ANSI C63.10 using an inductive shielded loop antenna. As this antenna measures the magnetic field only, its antenna factors are converted to electric field strength values assuming a free space impedance of  $377 \Omega$  as described in clause 4.3.1 of ANSI C63.10. This results in an additional correction of 51.53 dB.

According to clause 6.4.3 of ANSI C63.10, at frequencies below 30 MHz, measurements may be performed at a distance closer than that specified in the requirements. In this case, the results are extrapolated to the specified distance by using a recalculation factor determined according to one of the methods described in clause 6.4.4 of ANSI C63.10, provided that the maximum dimension of the device is equal to or less than 0.625 times the wavelength at the frequency being measured. As the minimum wavelength is 10 meters corresponding to the maximum frequency of 30 MHz, this requirement is fulfilled if the maximum dimension of the device is equal to or less than 6.25 meters.

Unless otherwise stated, the recalculation factor is determined according to clause 6.4.4.2 “Extrapolation from the measurement of a single point” of ANSI C63.10:

$$d_{near\ field} = 47.77 / f_{MHz}, \text{ or}$$

$$f_{MHz} = 47.77 / d_{near\ field}$$

The frequency  $f_{MHz}$  at which the near field distance is equal to the limit and/or test distance is important for selection of the right formula to determine the recalculation factor:

$$f_{MHz}(300\ m) \approx 0.159\ MHz$$

$$f_{MHz}(30\ m) \approx 1.592\ MHz$$

$$f_{MHz}(3\ m) \approx 15.923\ MHz$$

Based on the test distances for the general radiated emission limits as specified in §15.209 of 47 CFR Part 15 or RSS-Gen, the following formulas are used to determine the recalculation factor:

Frequency (f)	$d_{limit}$	$d_{measure}$	Formula for recalculation factor
9 kHz $\leq$ f $\leq$ 159 kHz 490 kHz < f $\leq$ 1.592 MHz	300 m 30 m	3 m	$-40 \log(d_{limit} / d_{measure})$
159 kHz < f $\leq$ 490 kHz 1.592 MHz < f $\leq$ 15.923 MHz	300 m 30 m	3 m	$-40 \log(d_{near\ field} / d_{measure}) - 20 \log(d_{limit} / d_{near\ field})$
f > 15.923 MHz	30 m	3 m	$-20 \log(d_{limit} / d_{measure})$

Table 5: Recalculation factors for extrapolation

Prescans for radiated measurements below 30 MHz are performed in a fully anechoic room (called “CDC”). The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 6.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
9 kHz $\leq$ f < 150 kHz	200 Hz	$\leq$ 100 Hz	Peak, Average	Peak Quasi-peak, Average	Peak Quasi-peak, Average
150 kHz $\leq$ f < 30 MHz	9 kHz	$\leq$ 4.5 kHz	Peak, Average	Peak Quasi-peak, Average	Peak Quasi-peak, Average

Table 6: Bandwidth and detector type for radiated emissions test below 30 MHz

<i>Frequency</i> <i>(MHz)</i>	<i>Reading value</i> <i>(dBμV)</i>	<i>Antenna correction</i> <i>(dB/m)</i>	<i>Cable attenuation</i> <i>(dB)</i>	<i>Correction factor (Corr.)</i> <i>(dB)</i>	<i>Level</i> <i>(dBμV/m)</i>
10	20.00	19.59	0.33	19.92	39.92

Table 7: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 20 dBμV + 19.92 dB = 39.92 dBμV/m

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

The radiated emissions test below 30 MHz is performed in the following steps:

- a) The loop antenna is positioned with its plane perpendicular to the ground with the lowest height of the antenna 1 m above the ground.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the loop antenna and set-up according to the specifications of the test (see table 6).
- d) The EUT is turned to a position likely to get the maximum and the test antenna is rotated to detect the maximum of the fundamental in this EUT position.
- e) Then the EUT is rotated in a horizontal plane through 360° in steps of 45°. Starting at 0°, at each table position the spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the current table position is noted as the maximum position.
- f) After the last prescan, the significant maximum emissions and their table positions are determined and collected in a list.
- g) With the test receiver set to the first frequency of the list, the EUT is rotated by  $\pm 45^\circ$  around the table position found during prescans while measuring the emission level continuously. For final scan, the worst-case table position is set and the maximum emission level is recorded.
- h) Step g) is repeated for all other frequencies in the list.
- i) Finally, for frequencies with critical emissions the loop antenna is rotated again to find the maximum of emission. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.

If the EUT may be used in various positions, steps a) to i) are repeated in two other orthogonal positions. If the EUT may be used in one position only, steps a) to i) are repeated in one orthogonal position.

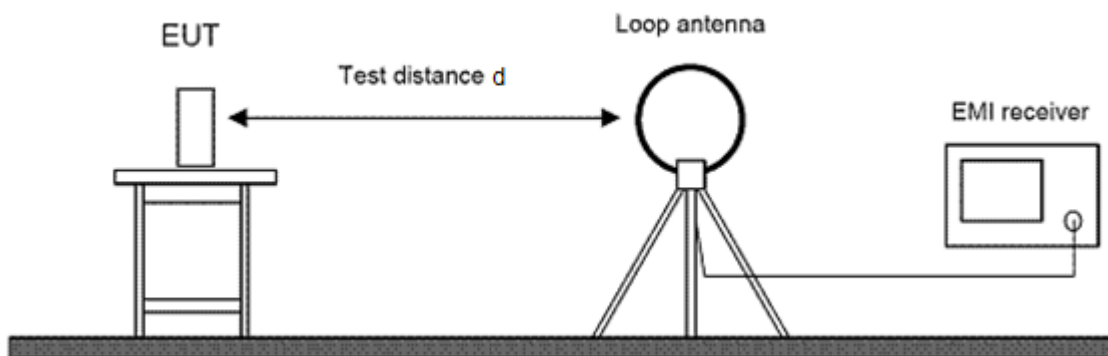


Figure 2: Setup for radiated emissions test below 30 MHz

## 5.4 Radiated emissions from 30 MHz to 1 GHz

Radiated emissions in the frequency range 30 MHz to 1 GHz are measured according to clause 6.5 of ANSI C63.10 using a semi-anechoic chamber (SAC) with a ground plane on the floor. The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 8.

Frequency ( <i>f</i> )	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
30 MHz ≤ <i>f</i> ≤ 1 GHz	120 kHz	≤ 60 kHz	Peak	Quasi-peak	Quasi-peak

Table 8: Bandwidth and detector type for radiated emissions test from 30 MHz to 1 GHz

Frequency (MHz)	Reading value (dB $\mu$ V)	Antenna correction (dB/m)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dB $\mu$ V/m)
100	30.00	11.71	1.06	12.77	42.77

Table 9: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 30 dB $\mu$ V + 12.77 dB = 42.77 dB $\mu$ V/m

The measurement antenna is a combination of a biconical antenna and a logarithmic-periodic dipole array antenna. It is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and in a height between 1 m and 4 m above the ground plane.

If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The radiated emissions test from 30 MHz to 1 GHz is performed in the following steps:

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 8).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
- g) The antenna height is increased to 4 m in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from 4 m to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) The EUT is rotated in a horizontal plane through 360° in steps of 60°. At each table position, steps e) to i) are repeated.
- k) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- l) With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- m) The antenna is moved by  $\pm 50$  cm around this height and the EUT is rotated by  $\pm 60^\circ$  around this table position while measuring the emission level continuously.
- n) For final scan, the worst-case positions of antenna and table are set and the maximum emission level is recorded.
- o) Steps l) to n) are repeated for all other frequencies in the list. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.



If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

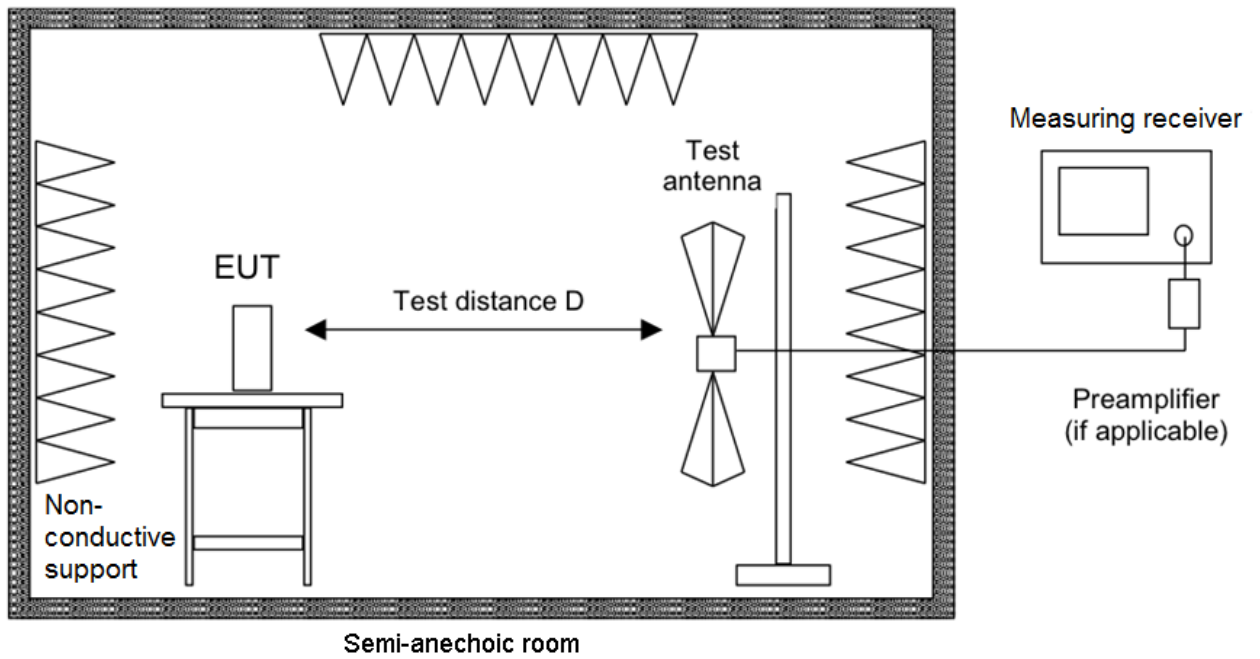


Figure 3: Setup for radiated emissions test from 30 MHz to 1 GHz

## 5.5 Radiated emissions above 1 GHz

Radiated emissions above 1 GHz are measured according to clause 6.6 of ANSI C63.10 by conducting exploratory and final radiated emission tests. According to clause 6.6.4.1 of ANSI C63.10, measurements may be performed at a distance closer than that specified in the requirements. However, an attempt shall be made to avoid making final measurements in the near field of both the measurement antenna and the EUT.

For measurement of radiated emissions above 1 GHz, horn antennas are used.

Test chamber	Frequency (MHz)	Reading value (dBμV)	Antenna correction (dB/m)	Correction pre-amplifier (dB)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dBμV/m)
SAC3	2400	50.00	27.76	-47.91	5.24	-14.92	35.08
FS-SAC	2400	50.00	27.76	-34.57	3.51	-3.30	46.70

Table 10: Sample calculation

Correction factor = Antenna correction + Correction pre-amplifier + Cable attenuation

SAC3:

Level = Reading value + Correction factor = 50.00 dBμV - 14.92 dB/m = 35.08 dBμV/m

FS-SAC:

Level = Reading value + Correction factor = 50.00 dBμV - 3.30 dB/m = 46.70 dBμV/m

### 5.5.1 Exploratory radiated emissions measurements

Exploratory radiated emissions above 1 GHz are measured in a semi-anechoic chamber with RF absorbing material on the floor or a fully anechoic room. They are performed by moving the receiving antenna over all sides of the EUT at a closer distance (e.g. 0.5 or 1 m) while observing the display of the test receiver to find the emissions to be re-tested during final radiated emission measurements.

According to clause 5.3.3 of ANSI C63.10, when performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade of distance (inverse of linear distance for field-strength measurements). To simplify testing and documentation, the limits are increased accordingly instead of decreasing the results.

The emissions of the EUT are displayed and recorded with an EMI test receiver operating in the spectrum analyzer mode using the settings as described in table 11.

Frequency (f)	Resolution bandwidth	Video bandwidth	Sweep time	Trace detector(s)	Trace mode(s)	Test
f ≥ 1 GHz	1 MHz	3 MHz	AUTO	Max Peak, Average	Clear Write	Searching
					Max Hold	Recording

Table 11: Bandwidth and trace settings for exploratory radiated emissions test above 1 GHz

If during exploratory radiated emissions measurements no levels to be re-tested are found, the final radiated emissions measurement may be omitted. In this case, the chart of the exploratory radiated emissions measurements has to be reported.

## 5.5.2 Final radiated emissions measurements

Final radiated emissions above 1 GHz are measured in the semi-anechoic chamber (SAC3) or Free space semi-anechoic chamber (FS-SAC) with RF absorbing material on the floor between measurement antenna and EUT. The measurement distance is 3 meters in the semi-anechoic chamber (SAC3) or 1.5 m in the Free space semi-anechoic chamber (FS-SAC). The emissions of the EUT are recorded with an EMI test receiver configured as described in table 12.

Frequency ( <i>f</i> )	Measurement receiver bandwidth	Step size	Detector type	
			Prescan	Final scan
$f \geq 1 \text{ GHz}$	1 MHz	$\leq 500 \text{ kHz}$	Peak, Average	Peak, Average

Table 12: Bandwidth and detector type for final radiated emissions test above 1 GHz

Prescans are performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The horn antenna is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and to be moved in a scan height range between 1 m and the scan height upper range defined in clause 6.6.3.3 of ANSI C63.10. When the EUT is manipulated through three different orientations, the scan height upper range for the measurement antenna is limited to 2.5 m above the ground plane or 0.5 m above the top of the EUT, whichever is higher. Otherwise, the scan height upper range is 4 m above the ground plane.

To keep the emission signal within the illumination area of the 3 dB beamwidth of the measurement antenna, the automatic tilt function of the antenna support device is used to point the antenna at an angle toward the source of the emission.

The final radiated emissions test above 1 GHz is performed in the following steps:

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 12).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
  - g) The antenna height is increased to the scan height upper range in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from the scan height upper range to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) The EUT is rotated in a horizontal plane through 360° in steps of 30°. At each table position, steps e) to i) are repeated.
- k) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- l) With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- m) The antenna is moved by  $\pm 50$  cm around this height and the EUT is rotated by  $\pm 30^\circ$  around this table position while measuring the emission level continuously.
- n) For final scan, the worst-case positions of antenna and table are set and the maximum emission level is recorded.
- o) Steps l) to n) are repeated for all other frequencies in the list. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

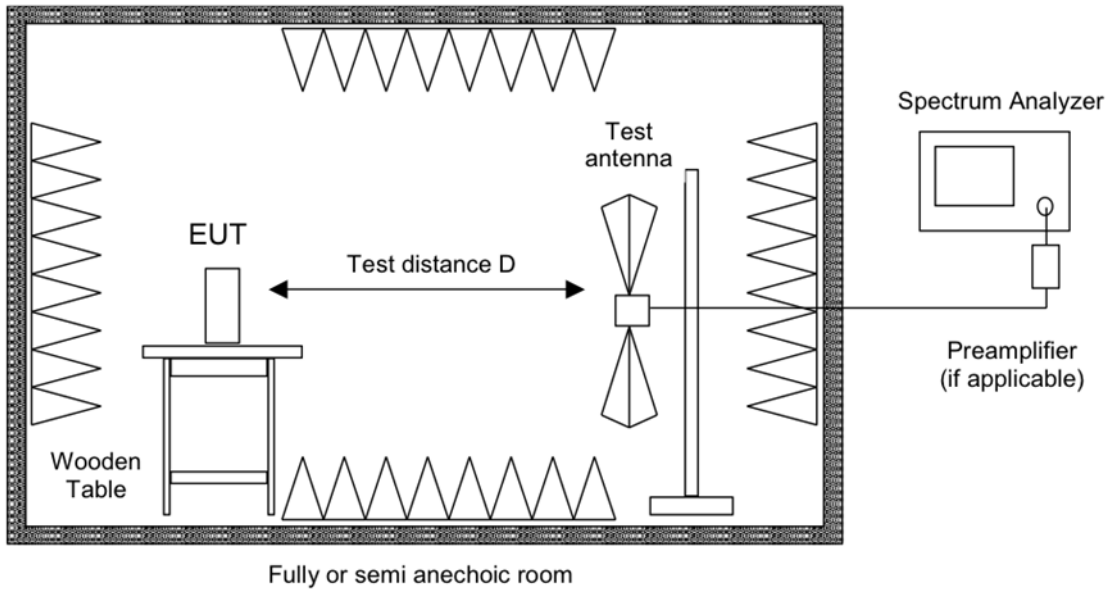


Figure 4: Setup for radiated emissions test above 1 GHz

## 5.6 Bandwidth measurements

### 5.6.1 20 dB bandwidth of the emission

The 20 dB bandwidth of the emission is measured according to clause 6.9.2 of ANSI C63.10 as the width of the spectral envelope of the modulated signal, at an amplitude level reduced by a ratio of 20 dB down from the reference value.

The spectrum analyzer center frequency is set to the nominal EUT channel center frequency. The span range for the EMI receiver or spectrum analyzer is between two times and five times the 20 dB bandwidth. The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1 % to 5 % of the 20 dB bandwidth and the video bandwidth (VBW) shall be approximately three times RBW.

The reference level of the instrument is set as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than [10 log (20 dB bandwidth/RBW)] below the reference level.

### 5.6.2 99 % occupied bandwidth

According to section 6.7 of RSS-Gen, the occupied bandwidth (OBW) is defined as the 99 % emission bandwidth.

The span of the spectrum analyzer is set large enough to capture all products of the modulation process, including the emission skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.

The resolution bandwidth is in the range of 1 % to 5 % of the occupied bandwidth and the video bandwidth is not smaller than three times the resolution bandwidth. Video averaging is not permitted.

If possible, the detector of the spectrum analyzer is set to "Sample". However, if the device is not transmitting continuously, a peak, or peak hold is used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement).

To measure the 99 % emission bandwidth, the OBW function of the test receiver is used with the power bandwidth set to 99 %. This function indicates the lowest frequency (starting from the left side of the span) and the highest frequency (starting from the right side of the span) where 0.5% of the total sum is reached. The difference between the two frequencies is the 99 % occupied bandwidth.

## 5.7 Operation within the band 13.110 MHz - 14.010 MHz

The EUT was placed in a fully anechoic chamber and the testing was performed in accordance with ANSI C63.10 and 47 CFR Part 15, section 15.225 (a) to (c). The measurement distance was 3 m. To find the closest margin of the spectrum to the limit mask adapted to the test distance the EUT was rotated by 360 degrees with detector of the test receiver set to peak. The loop antenna placed in a fixed height of 1 meter was rotated by 360 degrees to get the maximum of emission. In case of exceeding the limits the detector is switched to quasi peak for final testing in position of maximum emission.

## 5.8 Carrier frequency stability

1. If possible EUT is operating providing an unmodulated carrier. The peak detector of the spectrum analyzer is selected and resolution as well as video bandwidth are set to values appropriate to the shape of the spectrum of the EUT. The frequency counter mode of the spectrum analyzer is used to maximize the accuracy of the measured frequency tolerance.  
If an unmodulated carrier is not available a significant and stable point on the spectrum is selected and the span is reduced to a value that delivers an accuracy which shall be better than 1% of the maximum frequency tolerance allowed for the carrier signal. This method may be performed as long as the margin to the frequency tolerance allowed is larger than the uncertainty of the measured frequency tolerance.
2. The carrier frequency is measured depending on the variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 C.  
For battery operated equipment an external supply voltage can be used and set at the battery nominal voltage, and again at the battery operating end point voltage which must be specified by the equipment manufacturer. Alternatively, tests shall be performed using a new battery.
3. The carrier frequency is measured over a temperature variation of -20 degrees to +50 degrees C at normal supply voltage.

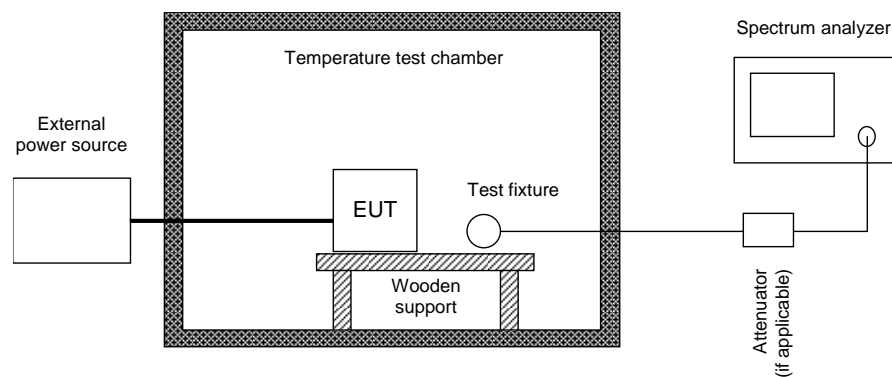


Figure 5: Test setup for carrier frequency stability measurement

## 6 Test results

This clause gives details about the test results as collected in the summary of test results on page 5.

For information about measurement uncertainties see page 48.

The climatic conditions are recorded during the tests. It is ensured that the climatic conditions are within the following ranges:

<i>Ambient temperature</i>	<i>Ambient humidity</i>	<i>Ambient pressure</i>
15°C to 35°C	30 % to 75 %	86 kPa to 106 kPa

Note(s):

1. All tests were performed with 120 V and 60 Hz.

## 6.1 AC powerline conducted emissions

Section(s) in 47 CFR Part 15:	Requirement(s):	15.207(a)
	Reference(s)	ANSI C63.10, clause 6.2
Section(s) in RSS:	Requirement(s):	RSS-Gen, section 8.8
	Reference(s):	ANSI C63.10, clause 6.2

Performed by:	Jennifer Riedel B. Eng.	Date of test:	June 29, 2022
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 6.1.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Shielded room	P92007	Siemens Matsushita	E00107
EMI test receiver	ESR 7	Rohde & Schwarz	E01549
Artificial mains network	ESH2-Z5	Rohde & Schwarz	E00004
Attenuator (10 dB)	50FHB-010-10	JFW Industries	E00471
Cable set shielded room	RG 223/U RG 223/U	AME HF-Technik AME HF-Technik	E00741 E00804
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073



### 6.1.2 Limits

According to §15.207(a):

Except as shown in paragraphs (b) and (c) of this section, for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30 MHz, shall not exceed the limits in the following table, as measured using a 50  $\mu$ H / 50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

According to §15.207(c):

Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

According to RSS-Gen, section 8.8:

Unless stated otherwise in the applicable RSS, for radio apparatus that are designed to be connected to the public utility AC power network, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the range 150 kHz to 30 MHz shall not exceed the limits in of the following table, as measured using a 50  $\mu$ H / 50  $\Omega$  line impedance stabilization network. This requirement applies for the radio frequency voltage measured between each power line and the ground terminal of each AC power-line mains cable of the EUT.

For an EUT that connects to the AC power lines indirectly, through another device, the requirement for compliance with the limits in the following table shall apply at the terminals of the AC power-line mains cable of a representative support device, while it provides power to the EUT. The lower limit applies at the boundary between the frequency ranges. The device used to power the EUT shall be representative of typical applications.

Frequency of emission (MHz)	Conducted limit (dB $\mu$ V)	
	Quasi-peak	Average
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

Table 13: Limits for AC powerline conducted emissions according to § 15.207 and RSS-Gen

\*Decreases with the logarithm of the frequency

### 6.1.3 Test procedure

The AC powerline conducted emissions are measured using the test procedure as described in clause 5.2.

### 6.1.4 Test results

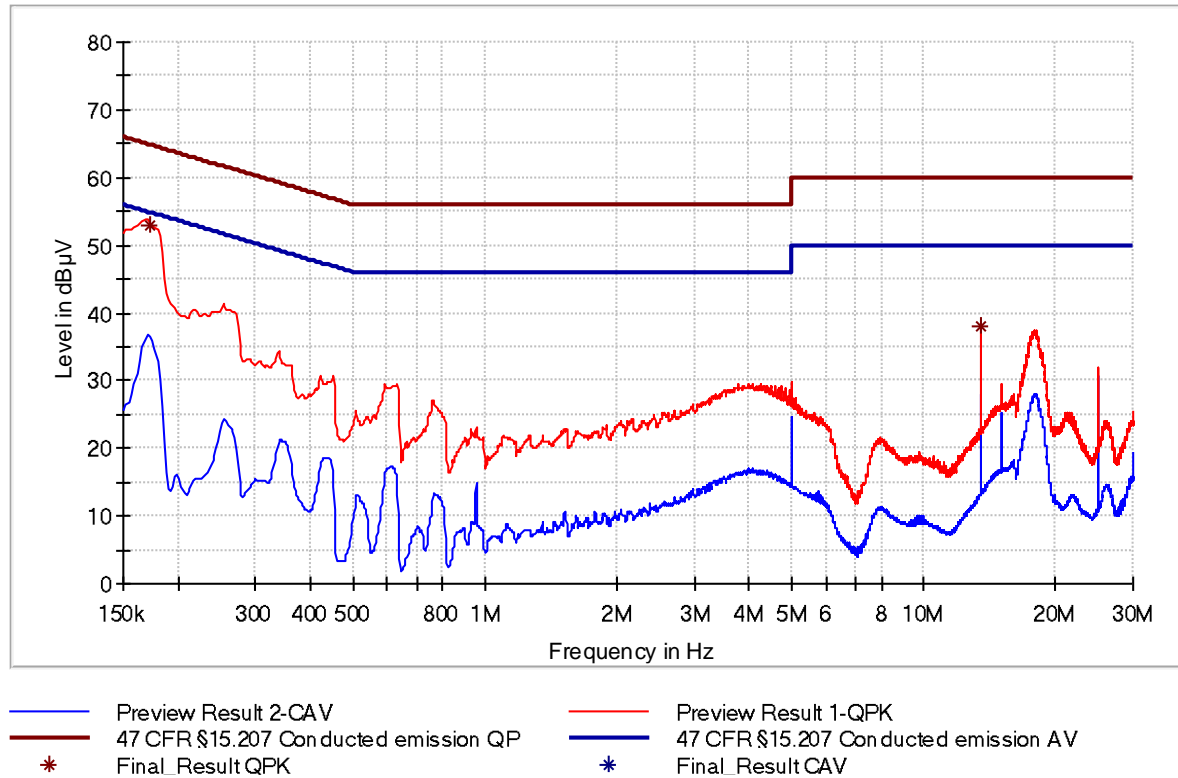


Figure 6: Chart of AC powerline conducted emissions on L1 – without termination

Frequency (MHz)	QuasiPeak (dBµV)	CAverage (dBµV)	Limit (dBµV)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Line	PE	Corr. (dB)
0.172500	53.04	---	64.84	11.80	1000.0	9.000	L1	GND	10.1
13.560000	38.01	---	60.00	21.99	1000.0	9.000	L1	GND	11.2

Table 14: Results of AC powerline conducted emissions on L1 – without termination

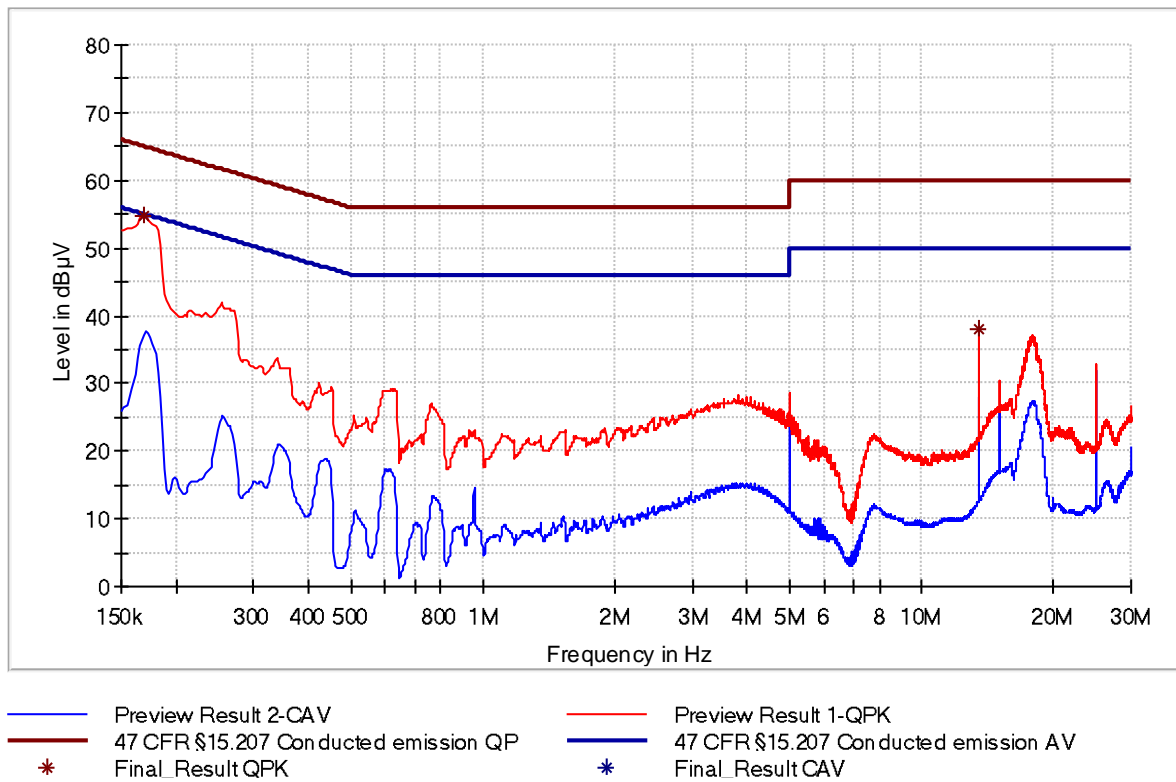


Figure 7: Chart of AC powerline conducted emissions on N – without termination

Frequency (MHz)	QuasiPeak (dBµV)	CAverage (dBµV)	Limit (dBµV)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Line	PE	Corr. (dB)
0.168000	54.69	---	65.06	10.37	1000.0	9.000	L1	GND	10.1
13.560000	38.05	---	60.00	21.95	1000.0	9.000	L1	GND	11.7

Table 15: Results of AC powerline conducted emissions on N – without termination

## 6.2 20 dB bandwidth

Section(s) in 47 CFR Part 15: Requirement(s): 15.215(c)  
 Reference(s): ANSI C63.10 , clause 6.9

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	June 30, 2022
Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed	

### 6.2.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Field probe	RF-R 400-1	Langer EMV-Technik	E00270

### 6.2.2 Limits

According to §15.215(c):  
 Intentional radiators operating under the alternative provisions to the general emission limits must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

### 6.2.3 Test procedure

The 20 dB bandwidth is measured using the conducted measurement procedure using a test fixture with the analyzer settings as described in clause 5.6.1 at normal conditions.  
 Any required results for maximum 20 dB bandwidth under extreme conditions are obtained by addition and subtraction of the upper and lower frequency error results (see clause 6.5.4) to each bandwidth measurement obtained in this test.

### 6.2.4 Test results

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.

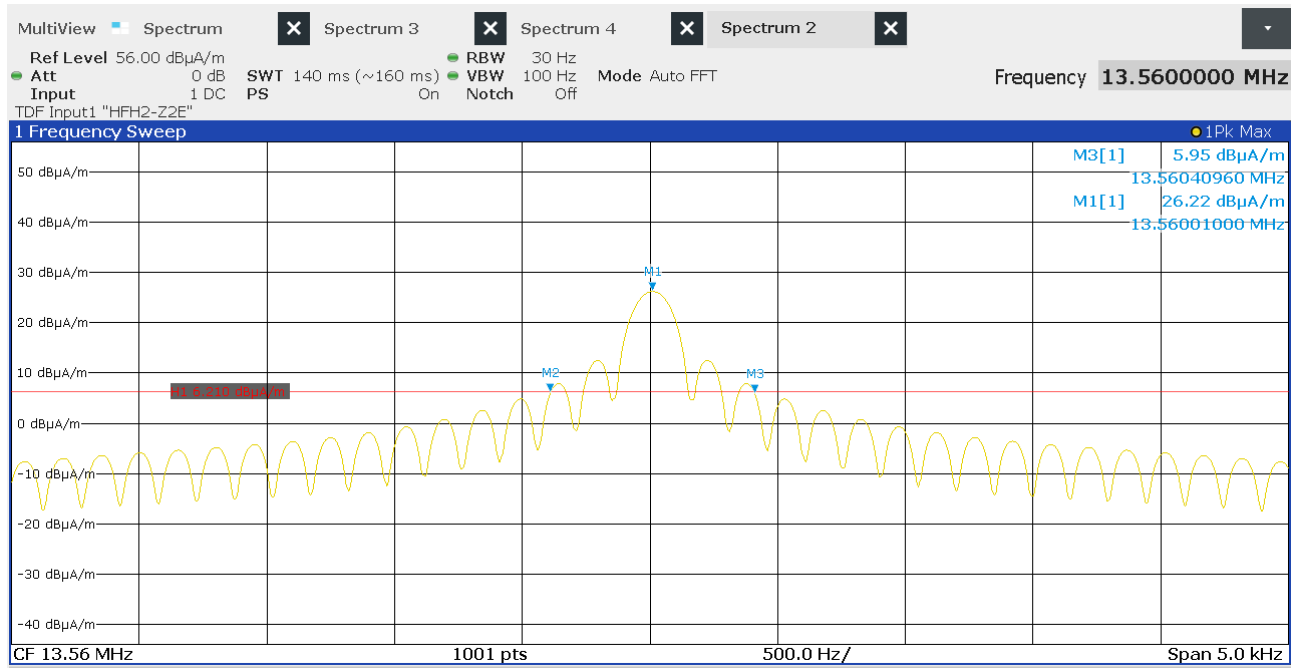


Figure 8: Chart of 20 dB bandwidth tests, without tag

20 dB bandwidth (kHz)	Band edge left		Band edge right		Result
	Frequency (MHz)	Limit (MHz)	Frequency (MHz)	Limit (MHz)	
0.799	13.559610	13.553000	13.560410	13.567000	Passed

Table 16: Results of 20 dB bandwidth tests, without tag

$f_{assigned}$ (MHz)	Index	$f_{-20dB}$ (MHz)	$\Delta f_T$ (kHz)	$\Delta f_U$ (kHz)	$f_{-20dB(T, U)}$ (MHz)	Limit (MHz)	Margin (kHz)	Result
13.56001	low	13.559610	---	---	13.559610	13.553000	6.61	Passed
	high	13.560410	0.3	0.3	13.560710	13.567000	6.29	Passed
	Bandwidth	0.799 kHz			1.10 kHz			

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with:	$f_{-20dB(low)}$	=	lower frequency in MHz where emission is at least 20 dB below the carrier
	$f_{-20dB(high)}$	=	upper frequency in MHz where emission is at least 20 dB below the carrier
	$f_{assigned}$	=	assigned frequency in kHz
	$\Delta f_{T(low)}$	=	maximum absolute value of negative frequency offset to frequency at nominal conditions caused by temperature variation in kHz
	$\Delta f_{U(low)}$	=	maximum absolute value of negative frequency offset to frequency at nominal conditions caused by voltage variation in kHz
	$\Delta f_{T(high)}$	=	maximum absolute value of positive frequency offset to frequency at nominal conditions caused by temperature variation in kHz
	$\Delta f_{U(high)}$	=	maximum absolute value of positive frequency offset to frequency at nominal conditions caused by voltage variation in kHz
	$\Delta f_{volt(high)}$	=	maximum absolute value of positive frequency offset to frequency at nominal conditions caused by voltage variation in kHz
	$f_{-20dB(T, U)}$	=	frequency in MHz where emission is at least 20 dB below the carrier, including offset caused by variations of temperature and supply voltage as recorded in clause 5.8

Measured -20 dB emission bandwidth:

At nominal conditions:

0.799 kHz

Including variations in temperature and supply voltage:

1.10 kHz

### 6.3 Occupied bandwidth

Section(s) in RSS: Requirement(s): RSS-Gen, section 6.7  
 Reference(s): ANSI C63.10, clause 6.9

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	June 30, 2022
Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed	

#### 6.3.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Field probe	RF-R 400-1	Langer EMV-Technik	E00270

#### 6.3.2 Limits

According to 2.1049(i):  
 Transmitters designed for other types of modulation—when modulated by an appropriate signal of sufficient amplitude to be representative of the type of service in which used. A description of the input signal should be supplied.

According to RSS-Gen, section 6.7:  
 There is no limit specified, the occupied bandwidth has to be recorded and reported.

#### 6.3.3 Test procedure

- Occupied bandwidth is measured using the
- radiated measurement procedure with the analyzer settings as described in clause 5.6.2.
  - conducted measurement procedure using a test fixture with the analyzer settings as described in clause 5.6.2.

### 6.3.4 Test results

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.

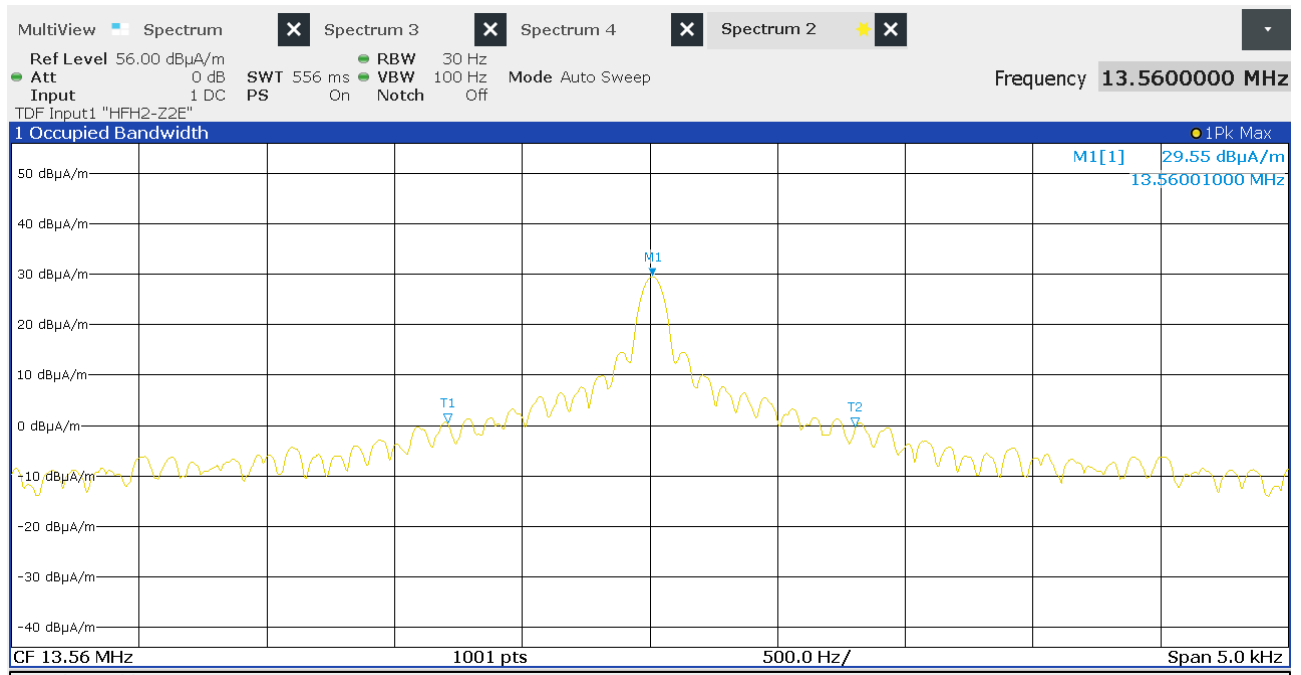


Figure 9: Chart of occupied bandwidth test, without tag

99% bandwidth (kHz)	Lower frequency Frequency (MHz)	Higher frequency Frequency (MHz)	Result
1.594	13.559207	13.560802	Recorded

Table 17: Results of occupied bandwidth test, without tag



## 6.4 Operation within the band 13.110 MHz – 14.010 MHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (a)-(c)
	Reference(s):	ANSI C63.10, section 6.4
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) I-III
	Reference(s):	ANSI C63.10, section 6.4

Performed by:	Konrad Graßl	Date(s) of test:	June 17, 2022
Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed	

### 6.4.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Compact Diagnostic Chamber (CDC)	VK041.0174	Albatross Projects	E00026
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Loop antenna	HFH2-Z2	Rohde & Schwarz	E00060
Cable set CDC	RF cable(s)	Huber + Suhner AME HF-Technik AME HF-Technik Stabo	E00446 E00920 E00921 E01215
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073

## 6.4.2 Limits

According to § 15.225(a)-(c):

The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15.848 microvolts/meter at 30 meters.

Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.

Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.

According to RSS-210 section B.6 I-III:

The field strength of any emissions shall not exceed the following limits:

15.848 mV/m (84 dB $\mu$ V/m) at 30 m, within the band 13.553-13.567 MHz

334  $\mu$ V/m (50.5 dB $\mu$ V/m) at 30 m, within the bands 13.410-13.553 MHz and 13.567-13.710 MHz

106  $\mu$ V/m (40.5 dB $\mu$ V/m) at 30 m, within the bands 13.110-13.410 MHz and 13.710-14.010 MHz

In case of measurements are performed at other distances than that specified in the requirements, the limits in the charts and tables reported with the test results are derived from the general radiated emission limits as listed above using the recalculation factor as described in clause 5.3.

## 6.4.3 Test procedure

The emission within the band 13.110 MHz – 14.010 MHz is measured using the test procedure as described in clause 5.7.

### 6.4.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m		
Antenna alignment:	<input checked="" type="checkbox"/> in parallel	<input checked="" type="checkbox"/> in line	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.
2. The chart shows the calculated limit at 3 m.

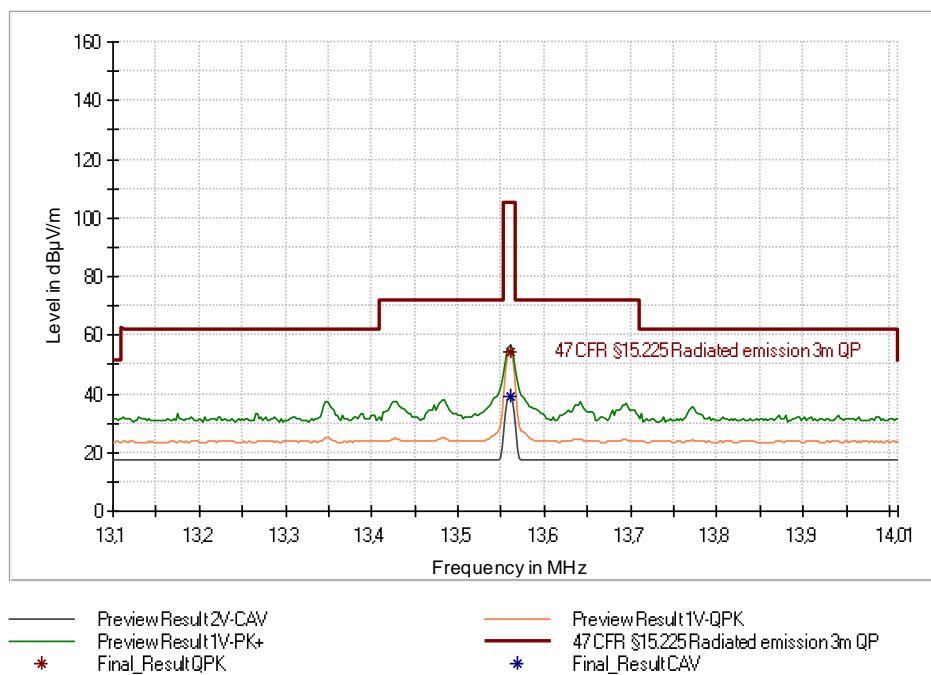


Figure 10: Chart of emission within the band 13.110 MHz to 14.010 MHz, EUT in position Z, without tag, antenna in line at 3 m distance

Frequency (MHz)	Measured field strength (dBµV/m) at 3 m	Recalculation factor (dB)	Field strength (dBµV/m) at 30 m	Limit (dBµV/m) at 30 m	Margin (dB)	Detector	Result
13.560000	54.20	-21.40	32.80	84.00	51.20	QP	Passed

Table 18: Results of emission within the band 13.110 MHz to 14.010 MHz, EUT in position Z, without tag, antenna in line

## 6.5 Carrier frequency stability

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225(e)
	Reference(s):	ANSI C63.10, section 6.8
Section(s) in RSS:	Requirement(s):	RSS-210, annex B6 (b)
	Reference(s):	RSS-Gen, section 6.11

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	June 30, 2022
Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed	

### 6.5.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Climatic chamber 990 I	VC4100	Vötsch Industrietechnik	C00014
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Field probe	RF-R 400-1	Langer EMV-Technik	E00270

### 6.5.2 Limits

According to §15.225 (e):

The frequency tolerance of the carrier signal shall be maintained within  $\pm 0.01\%$  of the operating frequency over a temperature variation of -20 degrees to +50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery. Alternatively, an external supply voltage can be used and set at the battery nominal voltage, and again at the battery operating end point voltage which must be specified by the equipment manufacturer.

According to RSS-210 section B.6 (b):

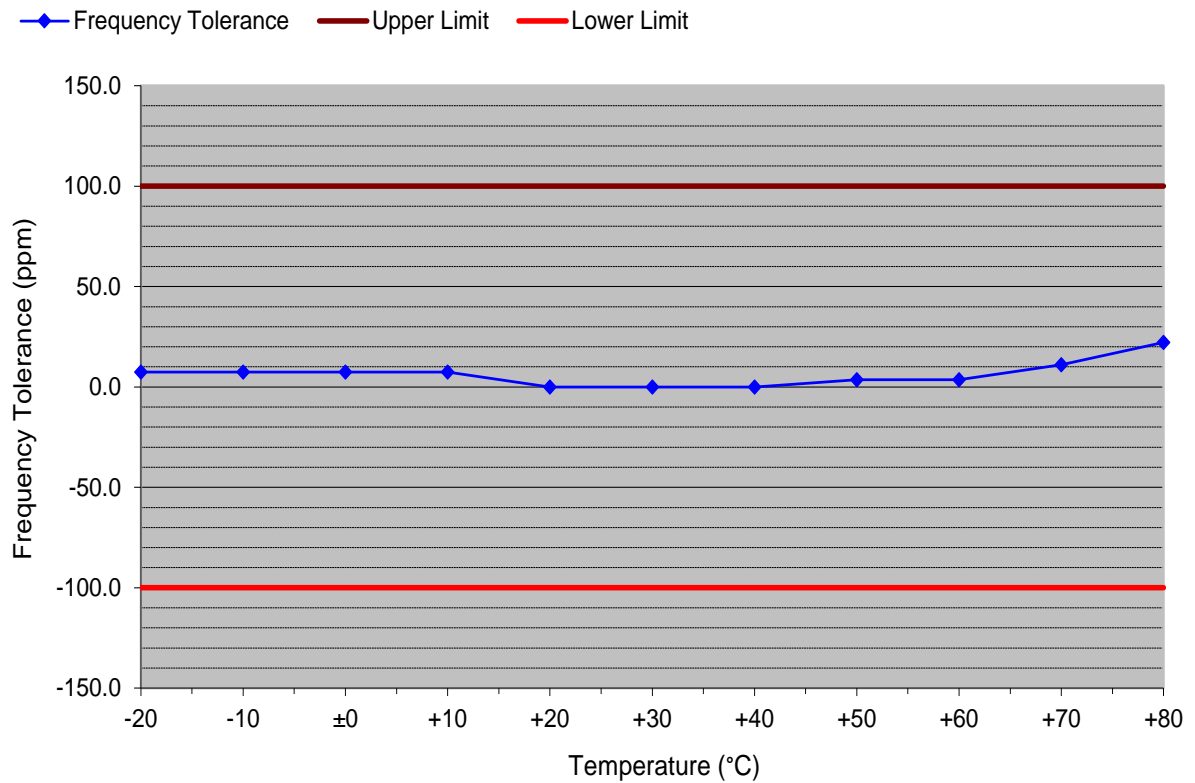
The carrier frequency stability shall not exceed  $\pm 100$  ppm.

### 6.5.3 Test procedure

The carrier frequency stability is measured using the test procedure as described in clause 5.8.

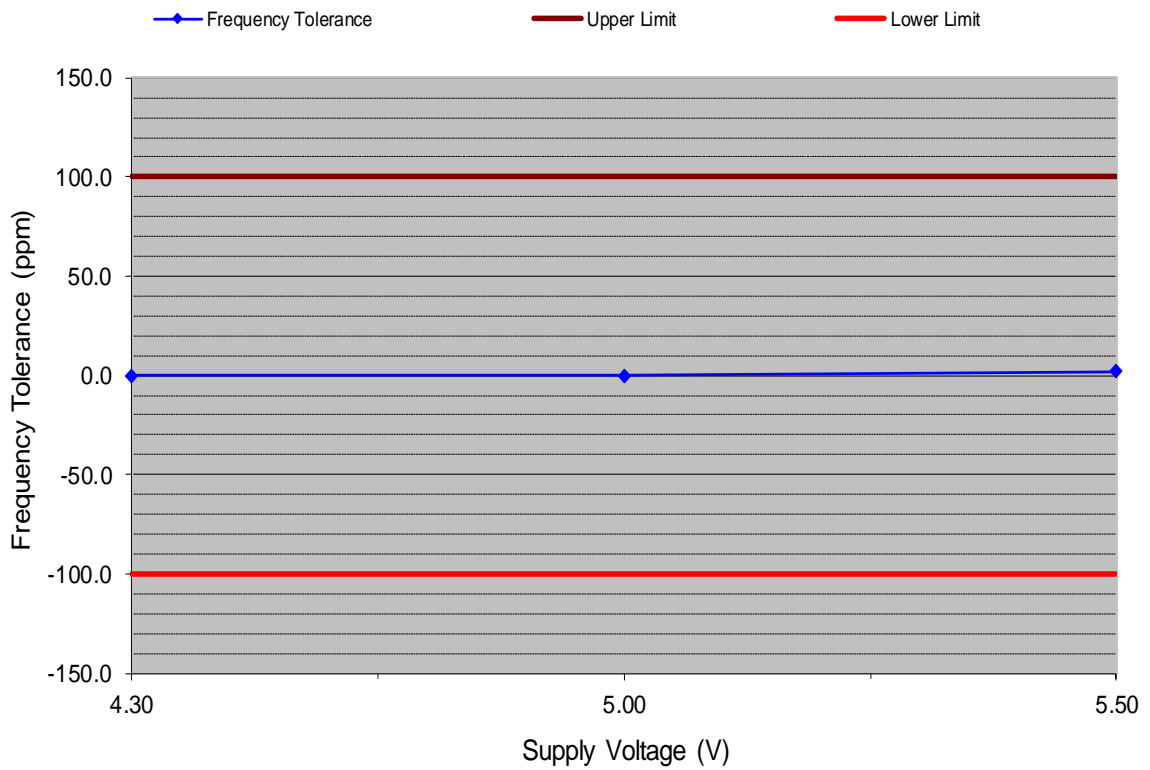
### 6.5.4 Test results

## Carrier frequency stability vs. temperature



Supply voltage:		5 V		Frequency under nominal conditions:		13.56 MHz	
Temperature (°C)	Frequency (MHz)	Frequency Tolerance (Hz)	Frequency Tolerance (ppm)	Upper Limit (ppm)	Lower Limit (ppm)	Margin (ppm)	
-25	13.560100	100	7.4	+100.0	-100.0	92.6	
-20	13.560100	100	7.4	+100.0	-100.0	92.6	
-10	13.560100	100	7.4	+100.0	-100.0	92.6	
±0	13.560100	100	7.4	+100.0	-100.0	92.6	
+10	13.560100	100	7.4	+100.0	-100.0	92.6	
+20	13.560000	0	0.0	+100.0	-100.0	100.0	
+30	13.560000	0	0.0	+100.0	-100.0	100.0	
+40	13.560000	0	0.0	+100.0	-100.0	100.0	
+50	13.560050	50	3.7	+100.0	-100.0	96.3	
+60	13.560050	50	3.7	+100.0	-100.0	96.3	
+70	13.560150	150	11.1	+100.0	-100.0	88.9	
+80	13.560300	300	22.1	+100.0	-100.0	77.9	

### Carrier frequency stability vs. supply voltage



Temperature:		+20 °C				
Frequency under nominal conditions:		13.56 MHz				
Supply Voltage (V)	Frequency (MHz)	Frequency (Hz)	Frequency Tolerance (ppm)	Upper Limit (ppm)	Lower Limit (ppm)	Margin (ppm)
4.30	13.560000	0	0.0	+100.0	-100.0	100.0
5.00	13.560000	0	0.0	+100.0	-100.0	100.0
5.50	13.560030	30	2.2	+100.0	-100.0	97.8

## 6.6 Emissions below 30 MHz outside the operating frequency band(s) specified

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (d)
	Reference(s):	ANSI C63.10, clause 6.4
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) IV
	Reference(s):	ANSI C63.10, clause 6.4

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Performed by:	Jennifer Riedel B. Eng.	Date of test:	June 17, 2022
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 6.6.1 Test equipment

<i>Type</i>	<i>Designation</i>	<i>Manufacturer</i>	<i>Inventory no.</i>
Compact Diagnostic Chamber (CDC)	VK041.0174	Albatross Projects	E00026
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Loop antenna	HFH2-Z2	Rohde & Schwarz	E00060
Cable set CDC	RF cable(s)	Huber + Suhner AME HF-Technik AME HF-Technik Stabo	E00446 E00920 E00921 E01215
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073

### 6.6.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu$ V/m)	(dB $\mu$ V/m)	
0.009 – 0.490	2400/F(kHz) (266.67 – 4.90)	48.52 – 13.80	300
0.490 – 1.705	24000/F(kHz) (48.98 – 14.08)	33.80 – 22.97	30
1.705 – 30	30	29.54	30

Table 19: General radiated emission limits up to 30 MHz according to §15.209

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu$ A/m)	(dB $\mu$ A/m)	
0.009 – 0.490	6.37/F(kHz) (0.708 – 0.013)	-2.999 – -37.721	300
0.490 – 1.705	63.7/F(kHz) (0.13 – 0.037)	-17.721 – -28.636	30
1.705 – 30	0.08	-21.94	30

Table 20: General radiated emission limits up to 30 MHz according to section 8.9 of RSS-Gen

In case of measurements are performed at other distances than that specified in the requirements, the limits in the charts and tables reported with the test results are derived from the general radiated emission limits as listed in table 19 and Table 20, using the recalculation factor as described in clause 5.3.

### 6.6.3 Test procedure

The emissions below 30 MHz are measured using the test procedure for radiated measurements as described in clause 5.3.



### 6.6.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m		
Antenna alignment:	<input checked="" type="checkbox"/> in parallel	<input checked="" type="checkbox"/> in line	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.
2. No assessable emissions could be detected.
3. The emission at 13.56 MHz is not in consideration in this test.
4. The limits in CFR 47, Part 15, Subpart C, paragraph 15.209(a), are identical to those in RSS-Gen section 8.9, Table 6, since the measurements are performed in terms of magnetic field strength and converted to electric field strength levels (as reported in the table) using the free space impedance of 377 Ohms. For example, the measurement at frequency X kHz resulted in a level of Y dBuV/m, which is equivalent to  $Y - 51.5 = Z$  dBuA/m, which has the same margin, W dB, to the corresponding RSS-Gen limit as it has to 15.209(a) limit.

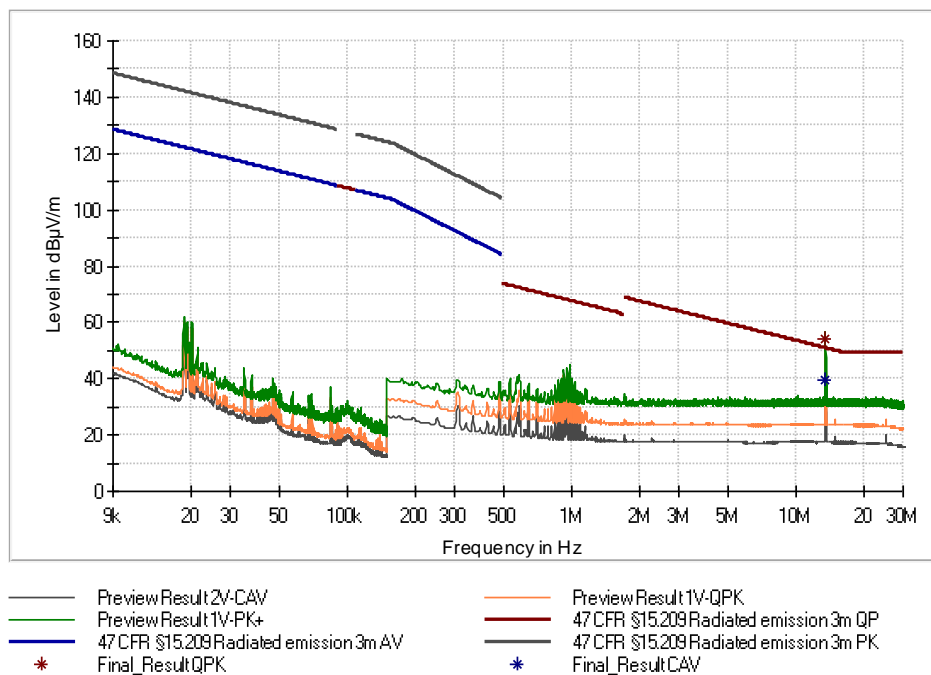


Figure 11: Chart of radiated emissions test below 30 MHz, EUT position Z, antenna in line, without tag

## 6.7 Spurious emissions from 30 MHz to 1 GHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (d)
	Reference(s):	ANSI C63.10, clause 6.5
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) IV
	Reference(s):	ANSI C63.10, clause 6.5

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Performed by:	Jennifer Riedel B. Eng.	Date of test:	June 14, 2022
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 6.7.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Semi-anechoic chamber (SAC)	SAC3	Albatross Projects	E00716
EMI test receiver	ESR 7	Rohde & Schwarz	E00739
TRILOG broadband antenna (SAC)	VULB 9162	Schwarzbeck	E00643
Cable set SAC	RF cable(s)	Huber + Suhner	E00755 E01033 E01034
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073

### 6.7.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

<i>Frequency (MHz)</i>	<i>Field strength</i>		<i>Measurement distance (m)</i>
	<i>(<math>\mu</math>V/m)</i>	<i>(dB<math>\mu</math>V/m)</i>	
30 – 88	100	40.00	3
88 – 216	150	43.52	3
216 - 960	200	46.02	3
Above 960	500	53.98	3

Table 21: General radiated emission limits  $\geq$  30 MHz according to §15.209 and RSS-Gen

### 6.7.3 Test procedure

The emissions from 30 MHz to 1 GHz are measured using the test procedure for radiated measurements as described in clause 5.4.

### 6.7.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m		
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.

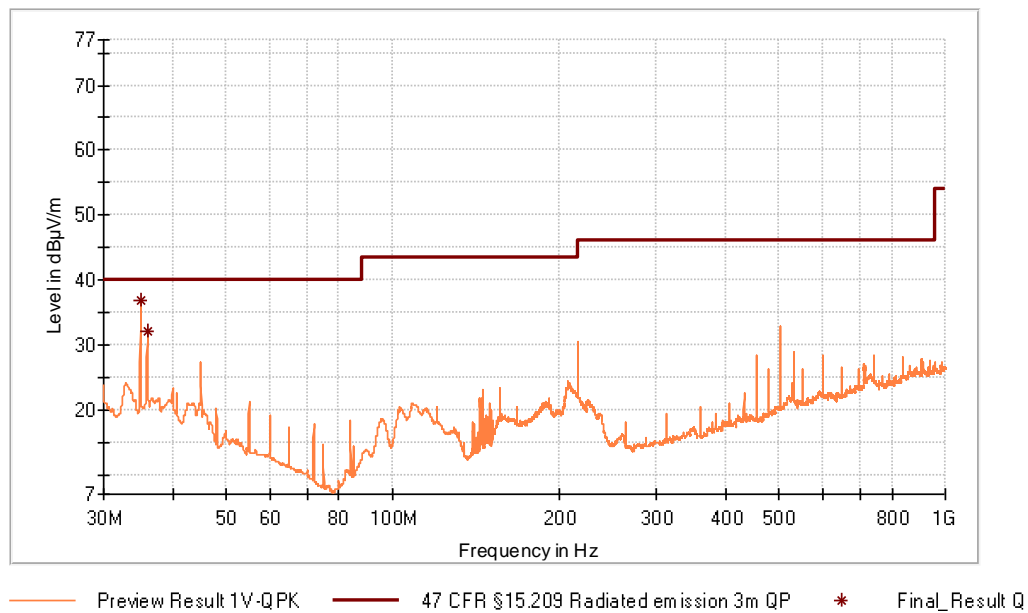


Figure 12: Chart of radiated emissions test from 30 MHz to 1 GHz, EUT position X, antenna vertical, with tag

Frequency (MHz)	Field strength (dBµV/m at 3 m)	Limit (dBµV/m at 3 m)	Margin (dB)	Height (cm)	Pol.	Azimuth (deg)	Corr. (dB/m)	Result
35.01000	36.84	40.00	3.16	100.0	V	266.0	11.6	Passed
36.00000	32.07	40.00	7.93	100.0	V	241.0	12.0	Passed

Table 22: Results of radiated emissions test from 30 MHz to 1 GHz, EUT position X, antenna vertical, with tag

## 6.8 Spurious emissions above 1 GHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (d)
	Reference(s):	ANSI C63.10, clause 6.6
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) IV
	Reference(s):	ANSI C63.10, clause 6.6

Performed by:	Jennifer Riedel B. Eng.	Date of test:	July 5, 2022
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 6.8.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Free space semi-anechoic chamber (FS-SAC)	FS-SAC	ELEMENT STRAUBING	E00100
EMI test receiver	ESU 26	Rohde & Schwarz	W00002
Preamplifier (0.5 GHz - 18 GHz)	BBV 9718 B	Schwarzbeck	W01325
Attenuator (10 dB)	R411.810.121	Radiall	W00707
Horn antenna	BBHA 9120D	Schwarzbeck	W00053
Cable set FS-SAC	RF cable(s)	Teledyne Reynolds Huber + Suhner Teledyne Reynolds	E00435 E00307 E00433

### 6.8.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{V/m}$ )	( $\text{dB}\mu\text{V/m}$ )	
Above 960	500	54	3

Table 23: General radiated emission limits above 960 MHz according to §15.209 and RSS-Gen

### 6.8.3 Test procedure

The emissions from 1 GHz to 2 GHz are measured using the test procedure for radiated measurements as described in clause 5.5.

### 6.8.4 Test results

Test distance:	Exploratory tests:	<input type="checkbox"/> 0.5 m	
	Final tests:	<input type="checkbox"/> 3 m	<input checked="" type="checkbox"/> 1.5 m
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

- 1 The measurements from 1 GHz to 2 GHz are made at a measurement distance of 1.5 m. However, the limit lines for these tests are referenced to the limit lines at a measurement distance of 3 m (Offset – 6 dB).
- 2 Pre-measurements were performed to declare the worst case which is documented below. The table results are the final measurements of the emissions detected in the pre-measurements which are shown in this test report.
- 3 According to clause 6.6.4.3, note 1 of ANSI C63.10, if the maximized peak measured value complies with the average limit, than it is unnecessary to perform an average measurement.
- 4 No assessable emissions could be detected.

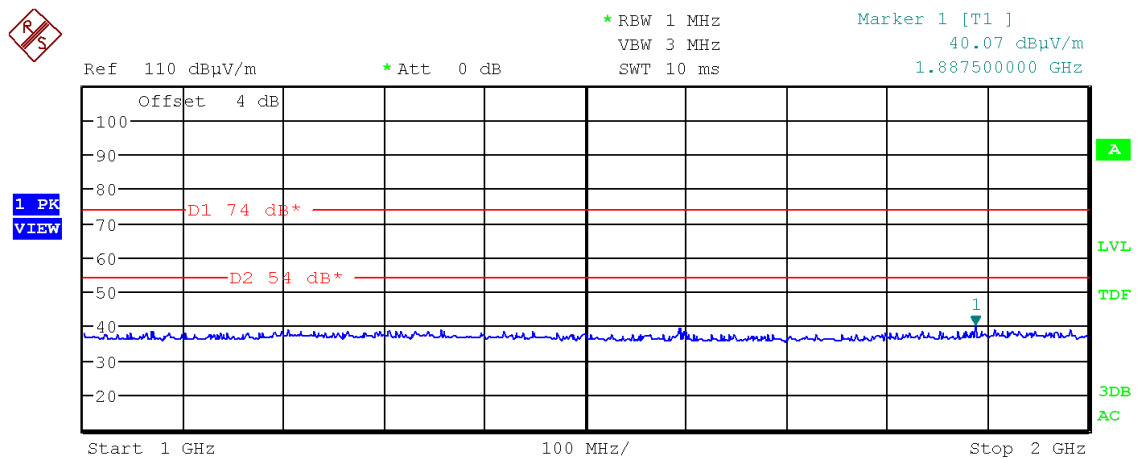


Figure 13: Chart of radiated pre-measurement from 1 GHz to 2 GHz, EUT position Z, with tag, antenna polarization horizontal

## 7 Equipment calibration status

Description	Modell number	Serial number	Inventory number(s)	Last calibration	Next calibration
EMI test receiver	ESW44	101538	E00895	2020-08	2022-08
EMI test receiver	ESU26	100026	W00002	2020-06	2022-06
EMI test receiver	ESR7	101059	E00739	2020-08	2022-08
EMI test receiver	ESCI3	100328	E00552	2020-10	2022-10
EMI test receiver	ESCI3	100013	E00001	2022-05	2024-05
Preamplifier (1 GHz – 18 GHz)	BBV 9718 B	00032	W01325	2021-09	2022-10
Preamplifier (18 GHz – 40 GHz)	BBV 9721	43	W01350	2021-11	2022-11
Preamplifier (1 GHz - 18 GHz)	ALS05749	001	W01007	2022-01	2023-01
Loop antenna	HFH2-Z2	871398/0050	E00060	2021-10	2023-10
LISN	ESH2-Z5	881362/037	E00004	Note 1	
LISN	ESH2-Z5	893406/009	E00005	2021-10	2023-10
Field probe	RF-R 400-1	02-2030	E00270	Note 2	
TRILOG broadband antenna (SAC3)	VULB 9162	9162-041	E00643	2021-03	2024-03
Horn antenna	BBHA 9120D	9120D-592	W00053	2020-04	2023-04
Horn antenna	BBHA 9170	9170-332	W00055	2020-04	2023-04
Shielded room	P92007	B 83117 C 1109 T 211	E00107	N/A	
Compact diagnostic chamber (CDC)	VK041.0174	D62128-A502-A69-2-0006	E00026	N/A	
Semi-anechoic chamber (SAC) with floor absorbers	FS-SAC	---	E00100	2021-03	2024-03
Semi-anechoic chamber (SAC)	SAC3	C62128-A520-A643-x-0006	E00716	2021-03	2024-03
Cable set CDC	RG214/U	---	E00446	2022-04	2023-04
	LCF12-50J	---	E01215	2022-04	2023-04
	LMR400	1718020006	E00920	2022-01	2023-01
	RG214 Hiflex	171802007	E00921	2022-01	2023-01
Cable set anechoic chamber	262-0942-1500	005	E00435	2021-10	2022-10
	SF104EA/2x11PC 35-42/5m	11144/4EA	E00307	2021-12	2022-12
	262-0942-1500	003	E00433	2021-10	2022-10
Cable set of semi-anechoic chamber SAC3	SF104EA/11PC35/11PC35/10000M M	501347/4EA	E00755	2021-12	2022-12
	SF104E/11PC35/11PC35/2000MM	507410/4E	E01035	2021-12	2022-12
	SF104E/11PC35/11PC35/2000MM	507411/4E	E01034	2021-09	2022-09

### Note(s)

1. Only used for decoupling of support equipment.
2. Only used for relative measurements.

## 8 Measurement uncertainties

Description	Uncertainty	$U_{Limit}$	Note(s)	k=
AC power line conducted emission	± 3.0 dB	± 3.4 dB	2b), 3b)	2
Carrier frequency stability	±0.1 ppm	±0.5 ppm	2a), 3d)	2
Bandwidth tests	± 2.0 %	± 5 %	2a), 3a)	2
Radiated emissions				
from 9 kHz to 30 MHz	± 3.8 dB	± 4.0 dB	2b), 3b)	2
from 30 MHz to 1 GHz	± 6.1 dB	± 6.3 dB	2b), 3b)	2
from 1 GHz to 6 GHz	± 4.6 dB	± 5.2 dB	2b), 3b)	2
from 6 GHz to 18 GHz	± 5.0 dB	± 5.5 dB	2b), 3b)	2
from 18 GHz to 26.5 GHz	± 5.4 dB	± 6.0 dB	2b), 3c)	2
from 26.5 GHz to 40 GHz	± 6.2 dB	± 6.5 dB	2b), 3c)	2

### Note(s):

- 1 The uncertainty stated is the expanded uncertainty obtained by multiplying the standard uncertainty by the coverage factor k. For a confidence level of 95 % the coverage factor k is 2.
- 2 The values of the measurement uncertainty as listed above are calculated according to
  - a) ETSI TR 100 028-1 V1.4.1 and ETSI TR 100 028-2 V1.4.1
  - b) CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
- 3 The limits for the measurement uncertainty as listed above are
  - a) derived from ETSI EN 300 328 V2.1.1
  - b) equal to  $U_{CISPR}$  taken from CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
  - c) defined by the test laboratory
  - d) derived from ETSI EN 300 220-1 V3.1.1
- 4 Simple acceptance is applied as the decision rule while keeping the specified limits ( $U_{Limit}$ ) for the expanded measurement uncertainty (i.e. Test Uncertainty Ratio  $TUR \geq 1:1$ ). That means, compliance is based on the recorded level by the lab irrespective of the expanded measurement uncertainty value but with a limitation to it.
- 5 All used test instruments as well as the test accessories are calibrated at regular intervals.



## 9 Revision history

<i>Revision</i>	<i>Date</i>	<i>Issued by</i>	<i>Description of modifications</i>
0	2022-07-26	Jennifer Riedel B. Eng.	First edition

Template: RF\_15.225\_RSS-210\_V1.7