

# Variant FCC HAC (RF Emission) Test Report

Report No. : HC180914C06C  
Applicant : Sonim Technologies, Inc.  
Address : 1875 S. Grant St., Suite 750., San Mateo, CA, 94402  
Product : Mobile Phone  
FCC ID : WYPPG2212  
Brand : Sonim  
Model No. : XP3800  
Type Number : PG2212  
Standards : FCC 47 CFR Part 20.19, ANSI C63.19-2011  
KDB 285076 D01 v05, KDB 285076 D02 v03  
Sample Received Date : May 06, 2019  
Date of Testing : Jun. 17, 2019  
Summary M-Rating : M4  
Lab Address : No. 47-2, 14th Ling, Chia Pau Vil., Lin Kou Dist., New Taipei City, Taiwan, R.O.C.  
Test Location : No. 19, Hwa Ya 2nd Rd, Wen Hwa Vil, Kwei Shan Dist., Taoyuan City 33383, Taiwan (R.O.C.)

**CERTIFICATION:** The above equipment have been tested by **Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch – Lin Kou Laboratories**, and found compliance with the requirement of the above standards. The test record, data evaluation & Equipment Under Test (EUT) configurations represented herein are true and accurate accounts of the measurements of the sample's HAC characteristics under the conditions specified in this report. It should not be reproduced except in full, without the written approval of our laboratory. The client should not use it to claim product certification, approval, or endorsement by TAF or any government agencies.

This report is issued as a supplementary report to BV CPS report no.: HC180914C06. The difference compared with original report is adding VoWiFi feature.

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FCC Accredited No.: TW0003

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### Appendix A. Photographs of EUT

## Release Control Record

Report No.	Reason for Change	Date Issued
HC180914C06C	Initial release	Jul. 18, 2019

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## 1. Summary of Maximum M-Rating

Mode	Band	Maximum Audio Interference Level (dBV/m)	M-Rating
GSM	GSM850	40.48	M3
	GSM1900	28.35	M4
WCDMA	Band II	N/A	M4
	Band IV	N/A	M4
	Band V	N/A	M4
FDD-LTE	Band 2	N/A	M4
	Band 4	N/A	M4
	Band 5	N/A	M4
	Band 7	N/A	M4
	Band 12	N/A	M4
	Band 13	N/A	M4
	Band 14	N/A	M4
	Band 26	N/A	M4
	Band 30	N/A	M4
	Band 66	N/A	M4
WLAN	2.4G	N/A	M4
	5.2G	N/A	M4
	5.3G	N/A	M4
	5.6G	N/A	M4
	5.8G	N/A	M4
Summary		M4	

### Note:

1. The HAC RF emission limit (**M-rating Category M3**) is specified in FCC 47 CFR part 20.19 and ANSI C63.19.
2. The device RF emission rating is determined by the minimum rating.

## FCC HAC (RF Emission) Test Report

### 2. Description of Equipment Under Test

<b>EUT Type</b>	Mobile Phone
<b>FCC ID</b>	WYPPG2212
<b>Brand Name</b>	Sonim
<b>Model Name</b>	XP3800
<b>Tx Frequency Bands (Unit: MHz)</b>	<b>GSM</b> GSM850 : 824.2 ~ 848.8 GSM1900 : 1850.2 ~ 1909.8 <b>WCDMA</b> Band II : 1852.4 ~ 1907.6 Band IV : 1712.4 ~ 1752.6 Band V : 826.4 ~ 846.6 <b>FDD-LTE</b> Band 2 : 1850.7 ~ 1909.3 (BW: 1.4M, 3M, 5M, 10M, 15M, 20M) Band 4 : 1710.7 ~ 1754.3 (BW: 1.4M, 3M, 5M, 10M, 15M, 20M) Band 5 : 824.7 ~ 848.3 (BW: 1.4M, 3M, 5M, 10M) Band 7 : 2502.5 ~ 2567.5 (BW: 5M, 10M, 15M, 20M) Band 12 : 699.7 ~ 715.3 (BW: 1.4M, 3M, 5M, 10M) Band 13 : 779.5 ~ 784.5 (BW: 5M, 10M) Band 14 : 790.5 ~ 795.5 (BW: 5M, 10M) Band 26 : 814.7 ~ 848.3 (BW: 1.4M, 3M, 5M, 10M, 15M) Band 30 : 2307.5 ~ 2312.5 (BW: 5M, 10M) Band 66 : 1710.7 ~ 1779.3 (BW: 1.4M, 3M, 5M, 10M, 15M, 20M) <b>WLAN</b> 2412 ~ 2462, 5180 ~ 5240, 5260 ~ 5320, 5500 ~ 5700, 5745 ~ 5825 <b>Bluetooth</b> 2402 ~ 2480
<b>Modulations Supported in Uplink</b>	GSM & GPRS : GMSK WCDMA : QPSK LTE : QPSK, 16QAM, 64QAM 802.11b : DSSS 802.11a/g/n : OFDM Bluetooth : GFSK, $\pi/4$ -DQPSK, 8-DPSK
<b>Antenna Type</b>	Fixed Internal Antenna
<b>EUT Stage</b>	Production Unit

#### Note:

1. This report is issued as a supplementary report to BV CPS report no.: HC180914C06. The difference compared with original report is adding VoWiFi feature. Therefore, the EUT was low power exclusion evaluated for VoWiFi.
2. The above EUT information is declared by manufacturer and for more detailed features description please refers to the manufacturer's specifications or User's Manual.

#### List of Accessory:

<b>Battery</b>	<b>Brand Name</b>	Sonim
	<b>Model Name</b>	BAT-01500-01S
	<b>Power Rating</b>	3.7Vdc, 1500mAh
	<b>Type</b>	Li-ion

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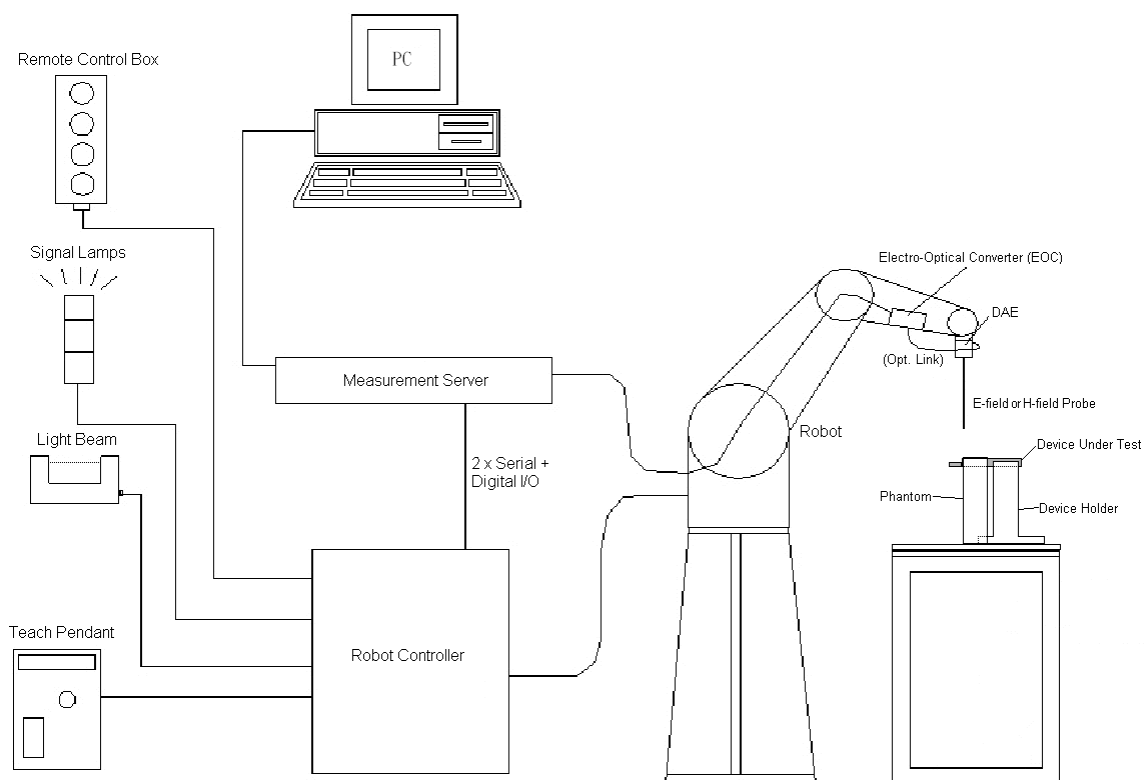
## Air Interface and Operational Mode:

Air Interface	Bands	Transport Type	HAC Tested	Simultaneous But Not Tested	Name of Voice Service	Power Reduction
GSM	850	VO	YES	WLAN or BT	CMRS Voice	No
	1900					No
	EGPRS	DT	No	WLAN or BT	N/A	No
WCDMA	II	VO	No <sup>(1)</sup>	WLAN or BT	CMRS Voice	No
	IV					No
	V					No
	HSPA	DT	No	WLAN or BT	N/A	No
FDD-LTE	2	VD	No <sup>(1)</sup>	WLAN or BT	VoLTE	No
	4					No
	5					No
	7					No
	12					No
	13					No
	14					No
	26					No
	30					No
	66					No
WLAN	2.4G	DT	No <sup>(1)</sup>	WWAN	VoWiFi	No
	5.2G	DT	No <sup>(1)</sup>		VoWiFi	No
	5.3G					No
	5.6G					No
	5.8G					No
Bluetooth	2.4G	DT	No	WWAN	N/A	No
Transport Type VO = Legacy Cellular Voice Service DT = Digital Transport Only (No Voice) VD = IP Voice Service over Digital Transport			Note 1. It applies the low power exemption per ANSI C63.19-2011.			

## 3. HAC RF Emission Measurement System

### 3.1 SPEAG DASY52 System

The SPEAG DASY52 system consists of high precision robot, probe alignment sensor, phantom, robot controller, controlled measurement server and near-field probe. The robot includes six axes that can move to the precision position of the DASY52 software defined. The DASY52 software can define the area that is detected by the probe. The robot is connected to controlled box. Controlled measurement server is connected to the controlled robot box. The DAE includes amplifier, signal multiplexing, AD converter, offset measurement and surface detection. It is connected to the Electro-optical coupler (ECO). The ECO performs the conversion form the optical into digital electric signal of the DAE and transfers data to the PC.



**Fig-3.1 DASY52 System Setup**

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### 3.1.1 Robot

The DASY52 system uses the high precision robots from Stäubli SA (France). For the 6-axis controller system, the robot controller version (DASY52: CS8c) from Stäubli is used. The Stäubli robot series have many features that are important for our application:

- High precision (repeatability  $\pm 0.035$  mm)
- High reliability (industrial design)
- Jerk-free straight movements
- Low ELF interference (the closed metallic construction shields against motor control fields)

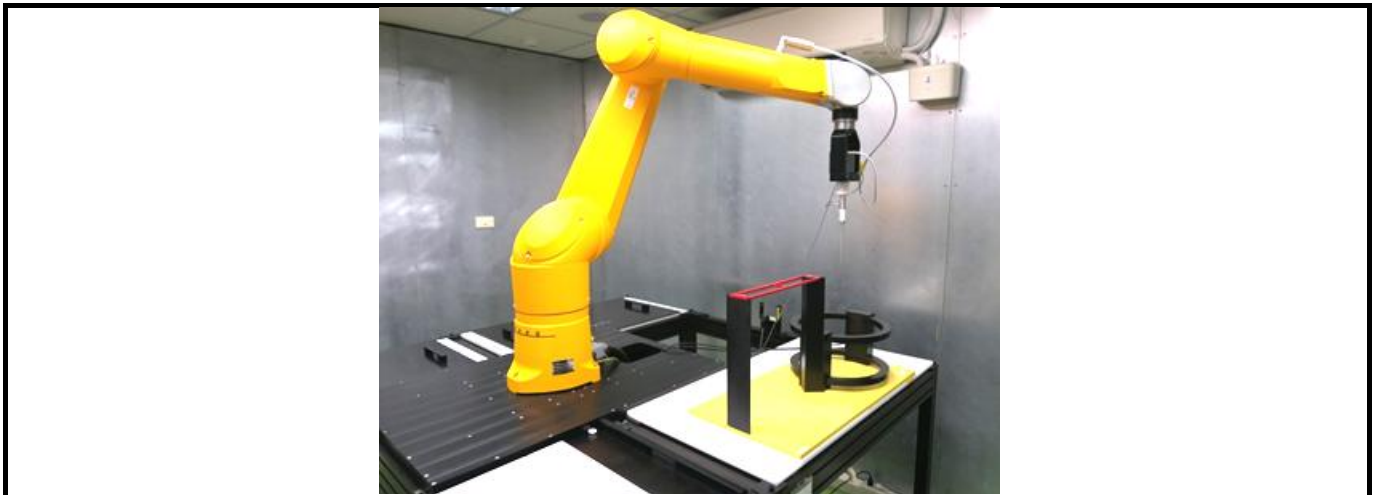




Fig-3.2 DASY52 Measurement System

### 3.1.2 Probes


<b>Model</b>	ER3DV6	
<b>Construction</b>	One dipole parallel, two dipoles normal to probe axis Built-in shielding against static charges	
<b>Frequency</b>	40 MHz to 3 GHz Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.2$ dB in air (rotation around probe axis) $\pm 0.4$ dB in air (rotation normal to probe axis)	
<b>Dynamic Range</b>	2 V/m to 1000 V/m Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	Overall length: 337 mm (Tip: 16 mm) Tip diameter: 8 mm (Body: 12 mm) Distance from probe tip to dipole centers: 2.5 mm	

<b>Model</b>	EF3DV3	
<b>Construction</b>	One dipole parallel, two dipoles normal to probe axis Built-in shielding against static charges	
<b>Frequency</b>	40 MHz to 6 GHz Linearity: $\pm 0.2$ dB	
<b>Directivity</b>	$\pm 0.2$ dB in air (rotation around probe axis) $\pm 0.4$ dB in air (rotation normal to probe axis)	
<b>Dynamic Range</b>	2 V/m to 1000 V/m Linearity: $\pm 0.2$ dB	
<b>Dimensions</b>	Overall length: 337 mm (Tip: 20 mm) Tip diameter: 3.9 mm (Body: 12 mm) Distance from probe tip to dipole centers: 1.5 mm	

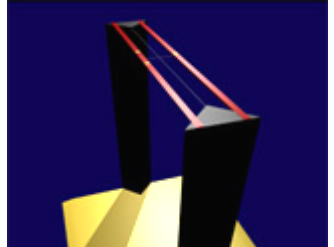


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### 3.1.3 Data Acquisition Electronics (DAE)

<b>Model</b>	DAE3, DAE4	
<b>Construction</b>	Signal amplifier, multiplexer, A/D converter and control logic. Serial optical link for communication with DASY embedded system (fully remote controlled). Two step probe touch detector for mechanical surface detection and emergency robot stop.	
<b>Measurement Range</b>	-100 to +300 mV (16 bit resolution and two range settings: 4mV, 400mV)	
<b>Input Offset Voltage</b>	< 5µV (with auto zero)	
<b>Input Bias Current</b>	< 50 fA	
<b>Dimensions</b>	60 x 60 x 68 mm	


### 3.1.4 Phantoms

<b>Model</b>	Test Arch	
<b>Construction</b>	Enables easy and well defined positioning of the phone and validation dipoles as well as simple teaching of the robot.	
<b>Dimensions</b>	Length : 370 mm Width : 370 mm Height : 370 mm	

### 3.1.5 Device Holder

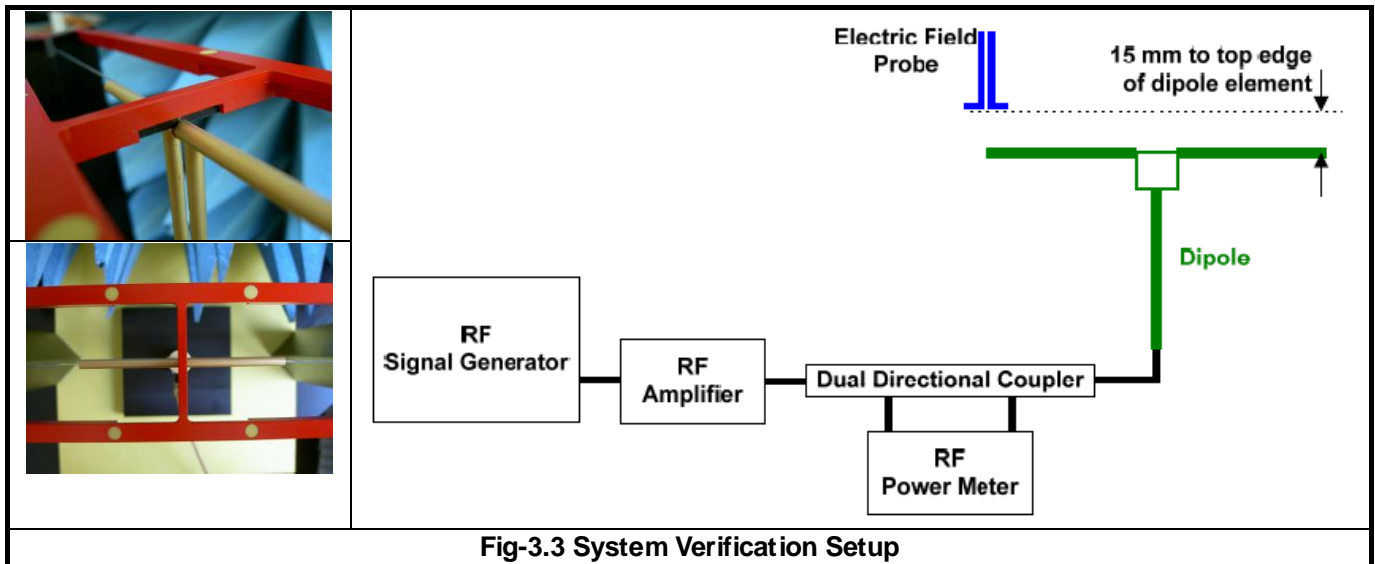
<b>Model</b>	Mounting Device	
<b>Construction</b>	The Mounting Device enables the rotation of the mounted transmitter device in spherical coordinates. Rotation point is the ear opening point. Transmitter devices can be easily and accurately positioned according to ANSI C63.19.	
<b>Material</b>	POM	

### 3.1.6 RF Emission Calibration Dipoles

<b>Model</b>	CD-Serial	
<b>Construction</b>	Free space antenna Hearing Aid susceptibility measurements according to ANSI C63.19. Validation of Hearing Aid RF setup for wireless device emission measurements according to ANSI C63.19	
<b>Frequency</b>	CD700V3 : 698 ~ 806 MHz CD835V3 : 800 ~ 960 MHz CD1880V3 : 1710 ~ 2000 MHz CD2450V3 : 2250 ~ 2650 MHz CD2600V3 : 2450 ~ 2750 MHz CD3500V3 : 3300 ~ 3950 MHz CD5500V3 : 5000 ~ 5900 MHz	
<b>Return Loss</b>	CD700V3 : > 15 dB (750 MHz > 20 dB) CD835V3 : > 15 dB (835 MHz > 25 dB) CD1880V3 : > 18 dB (1880 MHz > 20 dB) CD2450V3 : > 18 dB (2450 MHz > 25 dB) CD2600V3 : > 18 dB (2600 MHz > 20 dB) CD3500V3 : > 16 dB (3500 MHz > 20 dB) CD5500V3 : > 18 dB (5500 MHz > 20 dB)	
<b>Power Capability</b>	> 40 W continuous	

## 3.2 DASY52 System Verification

The system check verifies that the system operates within its specifications. It is performed before every E-field measurement. The system check uses normal measurements in the center section of the arch phantom with a matched dipole at a specified distance. The system verification setup is shown as below.



The validation dipole is placed beneath the center of arch phantom. The power meter measures the forward power at the location of the system check dipole connector. The signal generator is adjusted for the desired forward power, 100 mW (20 dBm) at the dipole connector and the RF power meter is read at that level. After connecting the cable to the dipole, the signal generator is readjusted for the same reading at RF power meter.

After system check testing, the E-field result will be compared with the reference value derived from validation dipole certificate report. The deviation of system check should be within 25 %.

The result of system verification is shown in section 4.3 of this report.

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### 3.3 EUT Measurements Reference and Plane

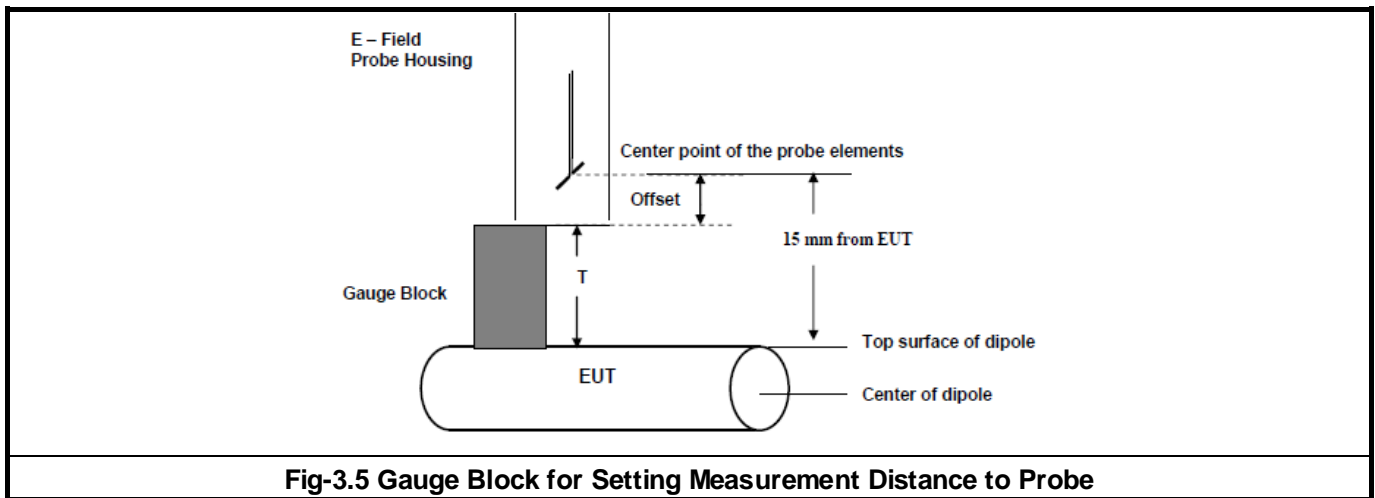
The EUT is mounted in the device holder. The acoustic output of the EUT will coincide with the center point of the area formed by the dielectric wire and the middle bar of the arch's top frame. Then EUT will be moved vertically upwards until it touches the frame.

Fig-3.4 and Fig-3.5 illustrate the references and reference plane that is used in the RF emissions measurement.

- The grid is 50 mm by 50 mm area that is divided into nine evenly sized blocks or sub-grids.
- The grid is centered on the audio frequency output transducer of the EUT.
- The grid is in a reference plane, which is defined as the planar area that contains the highest point in the area of the phone that normally rests against the user's ear. It is parallel to the centerline of the receiver area of the phone and is defined by the points of the receiver-end of the EUT handset, which in normal handset use rest against the ear.
- The measurement plane is parallel to and 15 mm in front of the reference plane.



Fig-3.4 EUT Reference and Plane



**Fig-3.5 Gauge Block for Setting Measurement Distance to Probe**

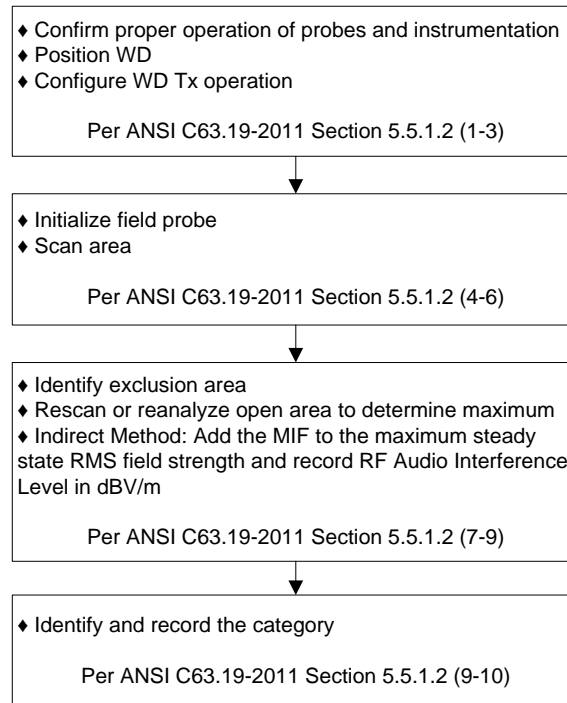
## 3.4 HAC RF Emission Measurement Procedure

The RF emissions test procedure for wireless communications device is as below.

1. Confirm the proper operation of the field probe, probe measurement system, and other instrumentation and the positioning system.
2. Position the WD in its intended test position.
3. Set the WD to transmit a fixed and repeatable combination of signal power and modulation characteristic that is representative of the worst case (highest interference potential) encountered in normal use. Transiently occurring start-up, changeover, or termination conditions, or other operations likely to occur less than 1% of the time during normal operation, may be excluded from consideration.
4. The center sub-grid shall be centered on the T-Coil mode perpendicular measurement point or the acoustic output, as appropriate. Locate the field probe at the initial test position in the 50 mm by 50 mm grid, which is contained in the measurement plane, illustrated in Fig-3.4. If the field alignment method is used, align the probe for maximum field reception.
5. Record the reading at the output of the measurement system.
6. Scan the entire 50 mm by 50 mm region in equally spaced increments and record the reading at each measurement point. The distance between measurement points shall be sufficient to assure the identification of the maximum reading.
7. Identify the five contiguous sub-grids around the center sub-grid whose maximum reading is the lowest of all available choices. This eliminates the three sub-grids with the maximum readings. Thus, the six areas to be used to determine the WD's highest emissions are identified.
8. Identify the maximum reading within the non-excluded sub-grids identified in step 7.
9. Indirect Measurement Method: The RF audio interference level in dB(V/m) is obtained by adding the MIF (in dB) to the maximum steady-state rms field-strength reading, in dB(V/m), from step 8. Use this result to determine the category rating.

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10. Compare this RF audio interference level with the categories in section 4.1 and record the resulting WD category rating.
- 11 For the T-Coil mode M-rating assessment, determine whether the chosen perpendicular measurement point is contained in an included sub-grid of the first can. If so, then a second scan is not necessary. The first scan and resultant category rating may be used for the T-Coil mode M-rating. Otherwise, repeat step 1 through step 9, with the grid shifted so that it is centered on the perpendicular measurement point. Record the WD category rating.



**Fig-3.6 WD Near-Field Emission Test Flowchart**

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### 3.5 Modulation Interference Factor

The HAC Standard ANSI C63.19-2011 defines a new scaling using the Modulation Interference Factor (MIF) which replaces the need for the Articulation Weighting Factor (AWF) during the evaluation and is applicable to any modulation scheme.

The Modulation Interference Factor (MIF, in dB) is added to the measured average E-field (in dBV/m) and converts it to the RF audio interference potential (in dBV/m). This level considers the audible amplitude modulation components in the RF E-field. CW fields without amplitude modulation are assumed to not interfere with the hearing aid electronics. Modulations without time slots and low fluctuations at low frequencies have low MIF values, TDMA modulations with narrow transmission slots and repetition rates of few 100 Hz have high MIF values and give similar classification as ANSI C63.19-2007.

ER3D E-field probe have a bandwidth <10 kHz and can therefore not evaluate the RF envelope in the full audio band. DASY52 is therefore using the "indirect" measurement method according to ANSI C63.19-2011 which is the primary method. This near field probe read the averaged E-field. Especially for the new high peak-to-average (PAR) signal types, the probes shall be linearized by PMR calibration in order to not overestimate the field reading.

The evaluation method for the MIF is defined in ANSI C63.19-2011 section D.7. An RMS demodulated RF signal is fed to a spectral filter (similar to an A weighting filter) and forwarded to a temporal filter acting as a quasi-peak detector. The averaged output of these filtering is scaled to a 1 kHz 80% AM signal as reference. It may alternatively be determined through analysis and simulation, because it is constant and characteristic for a communication signal. DASY52 uses well-defined signals for PMR calibration. The MIF of these signals has been determined numerically. It allows a precise scaling and is therefore automatically applied.

The following table lists the MIF values evaluated by DASY52 manufacturer (SPEAG), and the test result will be calculated with the MIF parameter automatically. The detailed parameters for E-field probe can be found in the probe calibration report in appendix C.

UID	Reversion	Communication System Name	MIF (dB)
10021	DAC	GSM-FDD (TDMA, GMSK)	3.63
10025	DAC	EDGE-FDD (TDMA, 8PSK, TN 0)	3.75
10460	AAA	UMTS-FDD (WCDMA, AMR)	-25.43
10225	CAB	UMTS-FDD (HSPA+)	-20.39
10081	CAB	CDMA2000 (1xRTT, RC3)	-19.71
10295	AAB	CDMA2000, RC1, SO3, 1/8th Rate 25 fr.	3.26
10403	AAB	CDMA2000 (1xEV-DO, Rev. 0)	-17.67
10170	CAE	LTE-FDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM)	-9.76
10172	CAG	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, QPSK)	-1.62
10173	CAG	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 16-QAM)	-1.44
10174	CAG	LTE-TDD (SC-FDMA, 1 RB, 20 MHz, 64-QAM)	-1.54
10061	CAB	IEEE 802.11b WiFi 2.4 GHz (DSSS, 11 Mbps)	-2.02
10077	CAB	IEEE 802.11g WiFi 2.4 GHz (DSSS/OFDM, 54 Mbps)	0.12
10427	AAB	IEEE 802.11n (HT Greenfield, 150 Mbps, 64-QAM)	-13.44
10069	CAC	IEEE 802.11a/h WiFi 5 GHz (OFDM, 54 Mbps)	-3.15
10616	AAB	IEEE 802.11ac WiFi (40MHz, MCS0, 90pc duty cycle)	-5.57

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The MIF measurement uncertainty listed in following table is estimated by SPEAG.

MIF (dB)	MIF Measurement Uncertainty (dB)
-7 to +5	0.2
-13 to +11	0.5
> -20	1.0

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### 4. HAC Measurement Evaluation

#### 4.1 M-Rating Category

The HAC Standard ANSI C63.19-2011 represents performance requirements for acceptable interoperability of hearing aids with wireless communications devices. When these parameters are met, a hearing aid operates acceptably in close proximity to a wireless communications device.

Emission Categories	E-Field Emissions < 960 MHz (dB V/m)	E-Field Emissions > 960 MHz (dB V/m)
Category M1	50 - 55	40 - 45
Category M2	45 - 50	35 - 40
Category M3	40 - 45	30 - 35
Category M4	< 40	< 30

#### 4.2 EUT Configuration and Setting

For HAC RF emission testing, the EUT was linked and controlled by base station emulator. Communication between the EUT and the emulator was established by air link. The distance between the EUT and the communicating antenna of the emulator is larger than 50 cm and the output power radiated from the emulator antenna is at least 30 dB smaller than the output power of EUT. The EUT was set from the emulator to radiate maximum output power during HAC testing.

#### 4.3 System Verification

This report is issued as a supplementary report to BV CPS report no.: HC180914C06. The difference compared with original report is adding VoWiFi feature. Therefore, the EUT was low power exclusion evaluated for VoWiFi



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### 4.4 Maximum Target Conducted Power

The maximum conducted average power (Unit: dBm) including tune-up tolerance is shown as below.

Air Interface		Max. Tune-up Power
GSM	GSM850	33.2
	EDGE850	26.5
	GSM1900	30.8
	EDGE1900	26.0
WCDMA	Band II	25.0
	Band IV	24.0
	Band V	25.0
FDD-LTE	Band 2	24.0
	Band 4	24.0
	Band 5	24.0
	Band 7	24.0
	Band 12	24.0
	Band 13	24.0
	Band 14	24.0
	Band 26	24.0
	Band 30	24.0
	Band 66	24.0
WLAN 2.4G	802.11b	16.0
	802.11g	16.0
	802.11n HT20	16.0
	802.11n HT40	13.0
WLAN 5.2G	802.11a	16.5
	802.11n HT20	16.5
	802.11n HT40	14.0
WLAN 5.3G	802.11a	16.5
	802.11n HT20	16.5
	802.11n HT40	14.0
WLAN 5.6G	802.11a	16.5
	802.11n HT20	16.5
	802.11n HT40	14.0
WLAN 5.8G	802.11a	16.5
	802.11n HT20	16.5
	802.11n HT40	14.0

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### 4.5 Low Power Exemption Evaluation

According to ANSI C63.19-2011 section 4, RF air interface technologies that have low power have been found to produce sufficiently low RF interference potential, so it is possible to exempt them from the product testing. An RF air interface technology of a device is exempt from testing when its average antenna input power plus its worst-case MIF is  $\leq 17$  dBm for any of its operating modes. If a device supports multiple RF air interfaces, each RF air interface shall be evaluated individually. An RF air interface technology that is exempted from testing by above method could be rated as M4.

The low power exemption for this device is analyzed in below.

Air Interface		Max. Tune-up Power (dBm)	Worst Case MIF (dB)	Power + MIF (dB)	C63.19 Testing Required
GSM	GSM850	33.2	3.63	36.83	YES
	EDGE850	26.5	3.75	30.25	No
	GSM1900	30.8	3.63	34.43	YES
	EDGE1900	26.0	3.75	29.75	No
WCDMA	AMR	25.0	-25.43	-0.43	No
	HSPA	25.0	-20.39	4.61	No
FDD-LTE		24.0	-9.76	14.24	No
WLAN 2.4G	802.11b	16.0	-2.02	13.98	No
	802.11g	16.0	0.12	16.12	No
	802.11n HT20	16.0	-13.44	2.56	No
	802.11n HT40	13.0	-13.44	-0.44	No
WLAN 5.2G	802.11a	16.5	-3.15	13.35	No
	802.11n HT20	16.5	-13.44	3.06	No
	802.11n HT40	14.0	-13.44	0.56	No
WLAN 5.3G	802.11a	16.5	-3.15	13.35	No
	802.11n HT20	16.5	-13.44	3.06	No
	802.11n HT40	14.0	-13.44	0.56	No
WLAN 5.6G	802.11a	16.5	-3.15	13.35	No
	802.11n HT20	16.5	-13.44	3.06	No
	802.11n HT40	14.0	-13.44	0.56	No
WLAN 5.8G	802.11a	16.5	-3.15	13.35	No
	802.11n HT20	16.5	-13.44	3.06	No
	802.11n HT40	14.5	-13.44	1.06	No

**Note:**

- The EDGE data modes were considered but not tested because GSM voice mode was worst case for the GSM air interface.

### **4.6 HAC RF Emission Testing Results**

For Low Power Exemption Evaluation of Chapter 4.5, the EUT was low power exclusion evaluated for WLAN (Power + MIF  $\leq 17$ dB).

## 5. Information of the Testing Laboratories

We, Bureau Veritas Consumer Products Services (H.K.) Ltd., Taoyuan Branch, were founded in 1988 to provide our best service in EMC, Radio, Telecom and Safety consultation. Our laboratories are accredited and approved according to ISO/IEC 17025.

If you have any comments, please feel free to contact us at the following:

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The road map of all our labs can be found in our web site also.

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### Appendix A. Photographs of EUT

The photographs of EUT for HAC measurement are shown as follows.