



FCC PART 90



TEST REPORT

For

Ondas Networks Inc.

165 Gibraltar Court,
Sunnyvale, CA 94089, USA

FCC ID: X27-NGBCP-1

Report Type: Permissive II Change Report	Product Type: Remote Station
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* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "*" (Rev.3)

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2301061-90	Permissive II Change Report	2023-01-18

1 General Information

1.1 Product Description for Equipment under Test (EUT)

This test report was prepared on behalf of *Ondas Networks Inc.* and their product model: S-ATCS-500F-900, FCC ID: X27-NGBCP-1, which will henceforth be referred to as the EUT (Equipment under Test). The EUT is a subscriber radio for point-to-multi-point that operates in the frequency range of 935.8875-936.9875 MHz, 896-896.125 MHz and 935-935.125 MHz.

1.2 Mechanical Description

The EUT measured approximately 40.64 cm (L) x 48.26 cm (W) x 8.89 cm (H) and weighs approximately 7.15kg.

The test data gathered are from typical production sample with BACL assigned serial number: R2301061-1

1.3 Objective

This report was prepared on behalf of *Ondas Networks Inc.* in accordance with Part 90 Subparts I and S and Part 2 Subpart J of the Federal Communication Commission's rules.

The purpose of the Class II Permissive Change was to add the 2FSK modulation to the 935-935.125MHz frequency range.

The objective was to determine compliance with FCC rules for RF output power, occupied bandwidth, frequency tolerance, emission limitations at band edges, spurious emissions at antenna terminal and field strength of spurious radiation.

1.4 Related Submittal(s)/Grant(s)

None

1.5 Test Methodology

All tests and measurements indicated in this document were performed in accordance with the Code of Federal Regulations Title 47 Part 90 Subparts I and S and Part 2 Subpart J.

All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratory, Corp. The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISEDC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.26-2015.

2.2 EUT Exercise Software

The test firmware used was Putty, provided by *Ondas Networks*, the software is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Rated Power (dBm)	SW Attenuation Setting	SW Bandwidth Setting
2FSK	935.0625	50	12	Default

2.3 Equipment Modifications

No modifications were made to the EUT.

2.4 Remote Support Equipment List and Details

Manufacturer	Descriptions	Models	Serial Numbers
Lenovo	Laptop	Thinkpad	-

2.5 Power Supply

Manufacturer	Descriptions	Models	Serial Numbers
Meanwell	Power Supply	RS-150-24	-

2.6 Interface Ports and Cabling

Cable Description	Length (m)	From	To
RF cable	< 1	EUT Output	Attenuator Input
RF cable	< 1	Attenuator Output	Combiner
RF cable	< 1	Combiner	GPS Receiver
RF cable	< 1	Combiner	Spectrum Analyzer
USB A to RJ45 Cable	1	Support Equipment	EUT Input

3 Summary of Test Results

FCC Rules	Description of Tests	Results
§1.1307, §2.1091, §90.223	RF Exposure	Compliant
§2.1046, §90.205(k), §90.635(b)	RF Output Power	Compliant
§2.1049, §90.209	Occupied Bandwidth	Compliant
§2.1053, §90.210	Spurious Radiated Emissions	Compliant ¹
§2.1051, §90.210	Spurious Emissions at Antenna Terminals	Compliant ¹
§90.210	Emission Mask	Compliant
§2.1055, §90.213	Frequency Tolerance	Compliant ¹

Note¹: Please refer to Report R2106282-90 issued by Bay Area Compliance Laboratories Corp. on 2022-09-22 for test data as they were covered by testing under worst-case CW transmissions.

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

4 FCC §1.1307(b) (1), §2.1091 &§90.223 - RF Exposure

4.1 Applicable Standards

According to FCC KDB 447498 D04 Interim General RF Exposure Guidance v01, Section 2.1 RF Exposure Test Exemptions for Single Source,

2.1.1 General RF Exposure Test Exemption Considerations

RF exposure test exemptions provide means to obtain certification without the need of showing data (measurements, or analytical/numerical modeling) to demonstrate compliance. Hereafter, in this context, an RF source is referred to as “exempt RF device” in the sense that it is not required to show data demonstrating compliance to RF exposure limits.

Test exemptions apply for devices used in general population/uncontrolled exposure environments, according to the SAR-based, or MPE-based exemption thresholds.⁸ However, it is always possible, especially when the potential for exposure cannot be easily determined, that an RF exposure evaluation may become required according §§ 1.1307(c) and (d).

As detailed in Section 2.1.2, the 1 mW and SAR-based test exemption conditions are in terms of source-based available maximum time-averaged (matched conducted) output power for all operating configurations, adjusted for tune-up tolerance, and at the minimum test separation distance required for the particular RF exposure scenario under consideration. This minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander.

To qualify for SAR test exemption, the test separation distances applied must be fully explained and justified (typically in the SAR measurement, or SAR analysis report, according to KDB Pub. 865664) by showing the actual operating configurations and exposure conditions of the transmitter, and applicable host platform requirements (e.g., KDB Pubs. 648474, 616217, 941225)

When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for SAR test exemption.

If RF exposure testing requirements for a specific device are covered in a KDB Publication, those requirements must be satisfied before applying any SAR test exemption provisions. For example, this is the case for handheld PTT two-way radios, handsets, laptops, and tablets, etc.⁹

Finally, when 10-g extremity SAR applies, SAR test exemption may be considered by applying a factor of 2.5 to the SAR-based exemption thresholds.

2.1.2 1-mW Test Exemption

Per §1.1307(b)(3)(i)(A), a single RF source is exempt RF device (from the requirement to show data demonstrating compliance to RF exposure limits, as previously mentioned) if the available maximum time-averaged power is no more than 1 mW, regardless of separation distance.

This exemption applies to all operating configurations and exposure conditions, for the frequency range 100 kHz to 100 GHz, regardless of fixed, mobile, or portable device exposure conditions. This is a standalone exemption, and it cannot be applied in conjunction with any other test exemption.

2.1.3 SAR-Based Exemption

A more comprehensive exemption, considering a variable power threshold that depends on both the separation distance and power, is provided in §1.1307(b)(3)(ii)(B). This exemption is applicable to the frequency range between 300 MHz and 6 GHz, with test separation distances between 0.5 cm and 40 cm, and for all RF sources in fixed, mobile, and portable device exposure conditions.

Accordingly, a RF source is considered an RF exempt device if its available maximum time-averaged (matched conducted) power or its effective radiated power (ERP), whichever is greater, are below a specified threshold. This exemption threshold was derived based on general population 1-g SAR requirements and is detailed in Appendix C.

2.1.4 MPE-Based Exemption

An alternative to the SAR-based exemption is provided in §1.1307(b)(3)(ii)(C), for a much wider frequency range, from 300 kHz to 100 GHz, applicable for separation distances greater or equal to $\lambda/2\pi$, where λ is the free-space operating wavelength in meters. The MPE-based test exemption condition is in terms of ERP, defined as the

⁸ Specific test exemption thresholds for operations under occupational/controlled limits are not established.

⁹ When SAR evaluation is required by the hotspot mode or UMPC mini-tablet procedures, that is, where an antenna is ≤ 2.5 cm from a surface or edge, the *test separation distance* from the phantom to the antenna or device enclosure, as appropriate, should be applied to determine SAR test exemption for such configurations, according to the criteria in this document. For that case, the *test separation distance* cannot be determined from the distance of the antenna to the device surface or edge.

According to ISED RSS-102 Issue 5 Section 2.5.1 Exemption Limits for Routine Evaluation-SAR Evaluation:

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in table below,

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤ 5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤ 300	71	101	132	162	193
450	52	70	88	106	123
835	17	30	42	55	67
1900	7	10	18	34	60
2450	4	7	15	30	52
3500	2	6	16	32	55
5800	1	6	15	27	41

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥ 50 mm
≤ 300	223	254	284	315	345
450	141	159	177	195	213
835	80	92	105	117	130
1900	99	153	225	316	431
2450	83	123	173	235	309
3500	86	124	170	225	290
5800	56	71	85	97	106

4.2 FCC RF Exposure Exemption Evaluation Procedures

According to FCC KDB 447498 D04 Interim General RF Exposure Guidance v01, Annex B Exemptions for Single Source,

B.1 General

This appendix provides the exemption criteria and summarizes relevant parameters and usage considerations based on descriptions in FCC 19-126.

B.2 Blanket 1 mW Blanket Exemption

The 1 mW Blanket Exemption of § 1.1307(b)(3)(i)(A) applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power of no more than 1 mW, regardless of separation distance. The 1 mW blanket exemption applies at separation distances less than 0.5 cm, including where there is no separation. This exemption shall not be used in conjunction with other exemption criteria other than those for multiple RF sources in paragraph § 1.1307(b)(3)(ii)(A). The 1 mW exemption is independent of service type and covers the full range of 100 kHz to 100 GHz, but it shall not be used in conjunction with other exemption criteria or in devices with higher-power transmitters operating in the same time-averaging period. Exposure from such higher-power transmitters would invalidate the underlying assumption that exposure from the lower-power transmitter is the only contributor to SAR in the relevant volume of tissue.

B.3 MPE-based Exemption

General frequency and separation-distance dependent MPE-based effective radiated power (ERP) thresholds are in Table B.1 [Table 1 of § 1.1307(b)(1)(i)(C)] to support an exemption from further evaluation from 300 kHz through 100 GHz.

Table B.1 – THRESHOLD FOR SINGLE RF SOURCE SUBJECT TO ROUTINE ENVIRONMENTAL EVALUATION

RF Source			Minimum Distance			Threshold ERP
f_L MHz		f_H MHz	$\lambda_L/2\pi$		$\lambda_H/2\pi$	W
0.3	-	1.34	159 m	-	35.6 m	1,920 R ²
1.34	-	30	35.6 m	-	1.6 m	3,450 R ² / f^2
30	-	300	1.6 m	-	159 mm	3.83 R ²
300	-	1,500	159 mm	-	31.8 mm	0.0128 R ² f
1,500	-	100,000	31.8 mm	-	0.5 mm	19.2 R ²

Subscripts L and H are low and high; λ is wavelength.
 From § 1.1307(b)(3)(i)(C), modified by adding Minimum Distance columns.

The table applies to any RF source (i.e., single fixed, mobile, and portable transmitters) and specifies power and distance criteria for each of the five frequency ranges used for the MPE limits. These criteria apply at separation distances from any part of the radiating structure of at least $\lambda/2\pi$. The thresholds are based on the general population MPE limits with a single perfect reflection, outside of the reactive near-field, and in the main beam of the radiator.

For mobile devices that are not exempt per Table B.1 [Table 1 of § 1.1307(b)(1)(i)(C)] at distances from 20 cm to 40 cm and in 0.3 GHz to 6 GHz, evaluation of compliance with the exposure limits in § 1.1310 is necessary if the ERP of the device is greater than ERP_{20cm} in Formula (B.1) [repeated from § 2.1091(c)(1) and § 1.1307(b)(1)(i)(B)].

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = 2040f \quad 0.3 \text{ GHz} \leq f < 1.5 \text{ GHz} \tag{B.1}$$

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \text{ (mW)} = 3060 \quad 1.5 \text{ GHz} \leq f \leq 6 \text{ GHz}$$

If the ERP is not easily obtained, then the available maximum time-averaged power may be used (i.e., without consideration of ERP only if the physical dimensions of the radiating structure(s) do not exceed the electrical length of $\lambda/4$ or if the antenna gain is less than that of a half-wave dipole.

SAR-based exemptions are constant at separation distances between 20 cm and 40 cm to avoid discontinuities in the threshold when transitioning between SAR-based and MPE-based exemption criteria at 40 cm, considering the importance of reflections.

B.4 SAR-based Exemption

SAR-based thresholds are derived based on frequency, power, and separation distance of the RF source. The formula defines the thresholds in general for either available maximum time-averaged power or maximum time-averaged ERP, whichever is greater.

If the ERP of a device is not easily determined, such as for a portable device with a small form factor, the applicant may use the available maximum time-averaged power exclusively if the device antenna or radiating structure does not exceed an electrical length of $\lambda/4$.

As for devices with antennas of length greater than $\lambda/4$ where the gain is not well defined, but always less than that of a half-wave dipole (length $\lambda/2$), the available maximum time-averaged power generated by the device may be used in place of the maximum time-averaged ERP, where that value is not known.

The separation distance is the smallest distance from any part of the antenna or radiating structure for all persons, during operation at the applicable ERP. In the case of mobile or portable devices, the separation distance is from the outer housing of the device where it is closest to the antenna.

The SAR-based exemption formula of § 1.1307(b)(3)(i)(B), repeated here as Formula (B.2), applies for single fixed, mobile, and portable RF sources with available maximum time-averaged power or effective radiated power (ERP), whichever is greater, of less than or equal to the threshold P_{th} (mW).

This method shall only be used at separation distances from 0.5 cm to 40 cm and at frequencies from 0.3 GHz to 6 GHz (inclusive). P_{th} is given by Formula (B.2).

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} (d/20 \text{ cm})^x \quad d \leq 20 \text{ cm} \tag{B.2}$$

$$P_{th} \text{ (mW)} = ERP_{20 \text{ cm}} \quad 20 \text{ cm} < d \leq 40 \text{ cm}$$

Where

$$x = -\log_{10} (60/(ERP_{20 \text{ cm}} \sqrt{f}))$$

and f is in GHz, d is the separation distance (cm), and EPR20cm is per Formula (B.1).

The example values shown in Table B.2 are for illustration only.

Table B.2 – Example Power Thresholds (mW)

Frequency (MHz)	Distance (mm)										
	5	10	15	20	25	30	35	40	45	50	
300	39	65	88	110	129	148	166	184	201	217	
450	22	44	67	89	112	135	158	180	203	226	
835	9	25	44	66	90	116	145	175	207	240	
1900	3	12	26	44	66	92	122	157	195	236	
2450	3	10	22	38	59	83	111	143	179	219	
3600	2	8	18	32	49	71	96	125	158	195	
5800	1	6	14	25	40	58	80	106	136	169	

4.3 RF exposure evaluation exemption for FCC

Prediction frequency[f] (MHz)		935.0625	
Maximum time-averaged output power (dBm)		47.00	
Maximum time-averaged output power (W)		50.00	
Prediction distance[R] (m)		15	
Maximum allowed antenna gain (dBi)		19.4	
Max ERP assuming Max allowed antenna gain (W)		2660.7	
Option C	$\lambda/2\pi$ (m)	$R > \lambda/2\pi$?	MPE-based Exemption Threshold
	0.05	Yes	P_{th} (W)
			2692.98

The time-averaged output power was derived from the maximum rated peak power (i.e., 50 dBm) and duty cycle (50%). For example, the time-averaged output power = peak output power – 10*log(1/duty cycle) = 50-3 = 47 dBm..

Note: Duty Cycle declared by customer

Note: Prediction distance declared by customer

Results

The EUT passes the ERP exemption threshold limit of 2692.98W with the Rated Power being 50 dBm, 50% duty cycle, prediction distance of 15m and antenna gain of 19.4dBi.

5 FCC §2.1046, §90.205(k) & §90.635(b) - RF Output Power

5.1 Applicable Standards

According to FCC §90.635(b), The maximum output power of the transmitter for mobile stations is 100 watts (20 dBw).

5.2 Test Procedure

Span > 2 * OBW

RBW > OBW

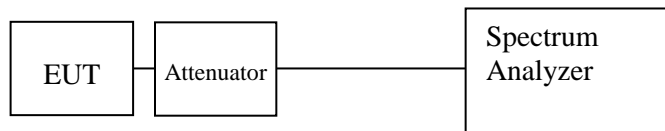
VBW ≥ 3 * RBW

Sweep = auto

Detector function = peak

Trace = max hold

5.3 Test Setup Diagram



5.4 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	24 months
-	-	RF Cable	-	-	Each time ¹	N/A
-	-	30dB Attenuator	-	-	Each time ¹	N/A

Note¹: Equipment was calibrated for each test.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

5.5 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	32 %
ATM Pressure:	101.4-102 kPa

The testing was performed by Christian McCaig on 2023-01-06 in the RF Site.

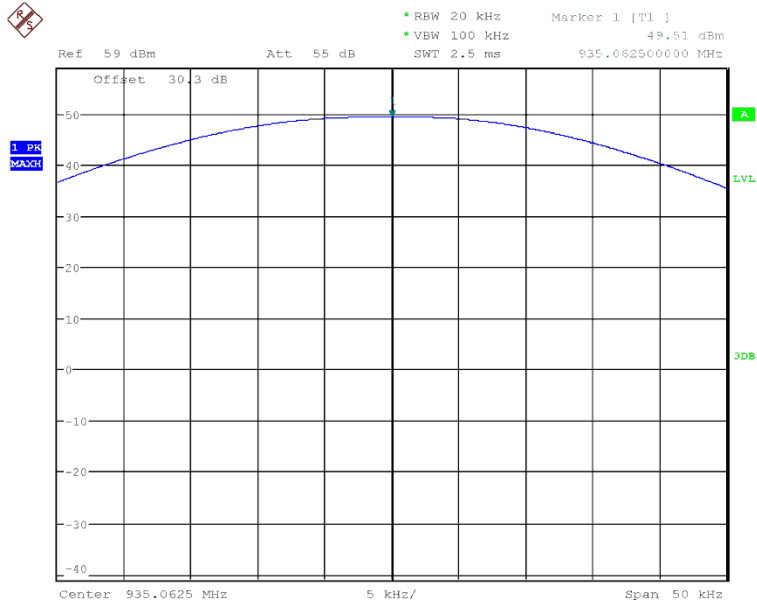
5.6 Test Results

Modulation	Frequency (MHz)	Output Power (dBm)	Output Power (Watts)	Limit (Watts)
2FSK	935.0625	49.51	89.33	100

Please refer to the following plots.

2FSK

935.0625MHz



6 FCC §2.1049 & §90.209 - Occupied Bandwidth

6.1 Applicable Standards

According to FCC §90.209 table 1, the authorized bandwidth within the frequency band of 896-901/935-940MHz is 13.6 kHz.

6.2 Test Procedure

Span = approximately 2 to 5 times the occupied bandwidth, centered on the transmitting channel

RBW = 1% to 5 % of the occupied bandwidth

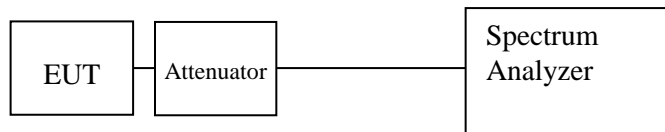
VBW = 3 * RBW

Sweep = auto

Detector function = peak

Trace = max hold

6.3 Test Setup Diagram



6.4 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	24 months
-	-	RF Cable	-	-	Each time ¹	N/A
-	-	30dB Attenuator	-	-	Each time ¹	N/A

Note¹: Equipment was calibrated for each test.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

6.5 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	32 %
ATM Pressure:	101.4-102 kPa

The testing was performed by Christian McCaig on 2023-01-06 in the RF Site.

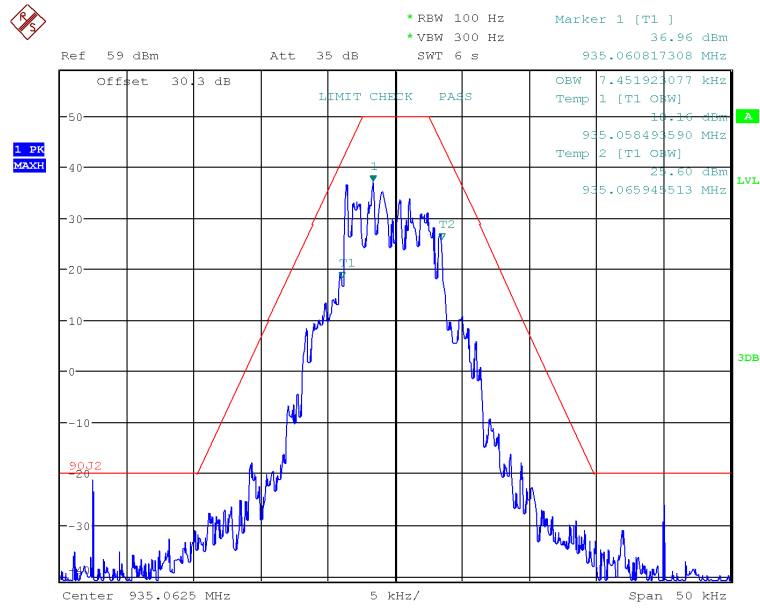
6.6 Test Results

Modulation	Frequency (MHz)	99% OBW (kHz)	OBW Limit (kHz)
2FSK	935.0625	7.4519	< 13.6

Please refer to the following plots.

2FSK

935.0625 MHz



7 FCC §2.1051 & §90.210 - Spurious Emissions at Antenna Terminals

7.1 Applicable Standards

According to FCC §90.210

TABLE 1 TO §90.210—APPLICABLE EMISSION MASKS

Frequency band (MHz)	Mask for equipment with audio low pass filter	Mask for equipment without audio low pass filter
Below 25 ¹	A or B	A or C
25-50	B	C
72-76	B	C
150-174 ²	B, D, or E	C, D or E
150 paging only	B	C
220-222	F	F
421-512 ^{2 5}	B, D, or E	C, D, or E
450 paging only	B	G
806-809/851-854 ⁶	B	H
809-824/854-869 ³⁵	B, D	D, G.
896-901/935-940	I	J
902-928	K	K
929-930	B	G
4940-4990 MHz	L or M	L or M
5850-5925 ⁴		
All other bands	B	C

(j) *Emission Mask J.* For transmitters that are not equipped with an audio low-pass filter, the power of any emission must be attenuated below the unmodulated carrier power of the transmitter (P) as follows:

(1) On any frequency removed from the center of the authorized bandwidth by a displacement frequency (f_d in kHz) of more than 2.5 kHz, but no more than 6.25 kHz: At least $53 \log(f_d/2.5)$ dB;

(2) On any frequency removed from the center of the authorized bandwidth by a displacement frequency (f_d in kHz) of more than 6.25 kHz, but no more than 9.5 kHz: At least $103 \log(f_d/3.9)$ dB;

(3) On any frequency removed from the center of the authorized bandwidth by a displacement frequency (f_d in kHz) of more than 9.5 kHz: At least $157 \log(f_d/5.3)$ dB, or $50 + 10 \log(P)$ dB or 70 dB, whichever is the lesser attenuation.

7.2 Test Procedure

Conducted spurious emissions:

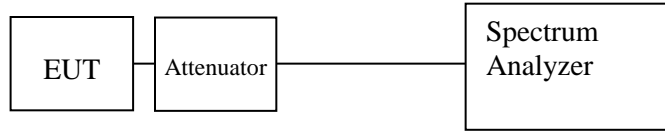
The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz for measurements up to 1GHz and set to 1 MHz for measurements up to the 10th harmonic.

Band-edge emissions:

According to ANSI C63.26-2015 section 5.7 Unwanted (out-of-band and spurious) conducted emissions measurement procedures (conducted test at antenna port):

A RBW narrower than the specified reference bandwidth can be used (generally limited to no less than 1% of the OBW).

7.3 Test Setup Diagram



7.4 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Interval
655	Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2022-02-07	24 months
-	-	RF Cable	-	-	Each time ¹	N/A
-	-	30dB Attenuator	-	-	Each time ¹	N/A

Note¹: Equipment was calibrated for each test.

Statement of Traceability: *BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 “A2LA Policy on Metrological Traceability”.*

7.5 Test Environmental Conditions

Temperature:	23° C
Relative Humidity:	32 %
ATM Pressure:	101.4-102 kPa

The testing was performed by Christian McCaig on 2023-01-06 in the RF Site.

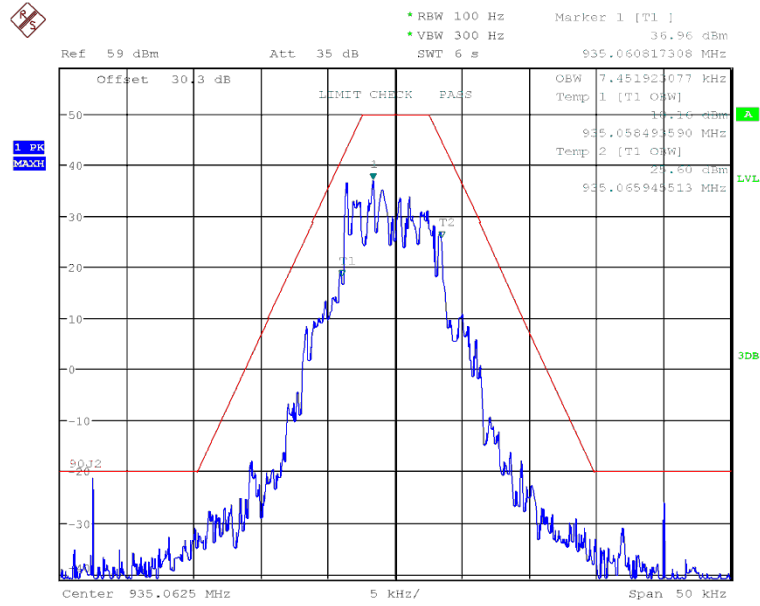
7.6 Test Results

Please refer to the following plots.

Emission Mask J:

2FSK

935.0625 MHz



Note: Spurious Emissions outside Emission Mask were evaluated in the radiated spurious emissions.

8 Annex A (Normative) - EUT External Photographs

Please refer to the attachment

9 Annex B (Normative) - EUT Internal Photographs

Please refer to the attachment

10 Annex C (Normative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 *General requirements for the competence of testing and calibration laboratories*. This laboratory also meets A2LA R222 - *Specific Requirements EPA ENERGY STAR Accreditation Program*. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 21st day of December 2022.

A blue ink signature of Mr. Trace McInturf.

Mr. Trace McInturf, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2024

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---