

3/28/2022

Zibrio, Inc.
11030 Strang Line Road
Lenexa, KS 66215

Dear Jeff Oesterle,

Enclosed is the EMC Wireless test report for compliance testing of the Zibrio, Inc., ZIBRIO Stability Home as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15 Subpart C for Intentional Radiators.

Thank you for using the services of Eurofins E&E North America. If you have any questions regarding these results or if we can be of further service to you, please feel free to contact me.

Sincerely yours,
EUROFINS E&E NORTH AMERICA

A handwritten signature in blue ink that reads "Joel Huna".

Joel Huna
Documentation Department

Reference: (\Zibrio, Inc.\WIRA107359-FCC247)

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Electromagnetic Compatibility Criteria Test Report

for the

Zibrio, Inc.
ZIBRIO Stability Home

Tested under
the FCC Certification Rules
contained in
15.247 Subpart C for Intentional Radiators

Report: WIRA107359-FCC247

3/28/2022

Prepared For:

Zibrio, Inc.
11030 Strang Line Road
Lenexa, KS 66215

Prepared By:
Eurofins E&E North America
13501 McCallen Pass, Austin, TX 78753

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15.247 Subpart C for Intentional Radiators



Adan Arab, Project Engineer
Electromagnetic Compatibility Lab



Joel Huna
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Part 15.247 under normal use and maintenance.



Jonathan Tavora,
Manager, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	02/10/2021	Initial Issue.
1	3/28/2022	Corrected FCCID and applicant information

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List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dB μ A	Decibels above one microamp
dB μ V	Decibels above one microvolt
dB μ A/m	Decibels above one microamp per meter
dB μ V/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μ H	microhenry
μ	microfarad
μ s	microseconds
NEBS	Network Equipment-Building System
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Zibrio, Inc. ZIBRIO Stability Home, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the ZIBRIO Stability Home. Zibrio, Inc. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the ZIBRIO Stability Home, has been **permanently** discontinued.

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with Zibrio, Inc., purchase order number 70082285. All tests were conducted using measurement procedure ANSI C63.10-2013.

FCC Reference 47 CFR Part 15.247:2020	Description	Compliance
Title 47 of the CFR, Part 15 §15.203	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	Conducted Emission Limits	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(2)	6dB Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	Peak Power Output	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	Spurious Emissions in Non-restricted Bands	Compliant
Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205	Radiated Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15; §15.247(e)	Peak Power Spectral Density	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	Maximum Permissible Exposure (MPE)	Compliant

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

Eurofins MET Laboratories Inc. (Eurofins E&E North America) is part of the Eurofins Electrical & Electronics (E&E) global compliance network.

II. Equipment Configuration

A. Overview

Eurofins E&E North America was contracted by Zibrio, Inc. to perform testing on the ZIBRIO Stability Home, under Zibrio, Inc.'s purchase order number 70082285.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Zibrio, Inc., ZIBRIO Stability Home.

The results obtained relate only to the item(s) tested.

Model(s) Tested:	ZIBRIO Stability Home	
Model(s) Covered:	ZIBRIO Stability Home	
EUT Specifications:	Primary Power:	100-240 VAC 50/60 Hz
	FCC ID:	2A2TJ-SQ8180811
	Type of Modulations:	GFSK
	Equipment Code:	DTS
	Peak RF Output Power:	-1.62 dBm
	EUT Frequency Ranges:	2402-2480 MHz
	Data rate(s)	2Mbps
	Antenna Type:	Ceramic Chip Antenna
	Antenna Gain:	5.05 dBi
	Support Software:	Hex Files
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature:	15-35° C
	Relative Humidity:	30-60%
	Barometric Pressure:	860-1060 mbar
Evaluated by:	Adan Arab	
Report Date(s):	02/10/2021	

Table 2. EUT Summary Table

B. References

CFR 47, Part 15, Subpart C	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
ANSI C63.4:2014	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ISO/IEC 17025:2017	General Requirements for the Competence of Testing and Calibration Laboratories
ANSI C63.10-2013	American National Standard for Testing Unlicensed Wireless Devices
KDB 558074 v05r02	Guidance For Performing Compliance Measurements On Digital Transmission Systems (DTS) Operating Under Section 15.247

Table 3. References

C. Test Site

Eurofins MET Laboratories Inc. (Eurofins E&E North America) is part of the Eurofins Electrical & Electronics (E&E) global compliance network.

All testing was performed at Eurofins E&E North America, 13501 McCallen Pass, Austin, TX 78753. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 10 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

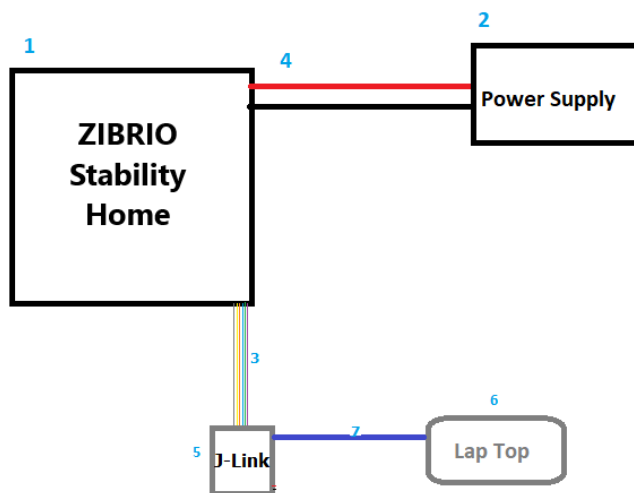
D. Measurement Uncertainty

Test Method	Typical Expanded Uncertainty (dB)	K	Confidence Level
RF Frequencies	±4.52 Hz	2	95%
RF Power Conducted Spurious Emissions	±2.25 dB	2	95%
RF Power Radiated Emissions	±3.01 dB	2	95%
Conducted Emission Voltage	±2.97 dB	2	95%

Table 4. Uncertainty Calculations Summary

E. Description of Test Sample

The Zibrio, Inc. ZIBRIO Stability Home, Equipment Under Test (EUT), is essentially a weight and balance scale. It's primary function is to indicate the balance proficiency of the patient and its secondary function is the same as any household scale.



Conducted Test Setup:

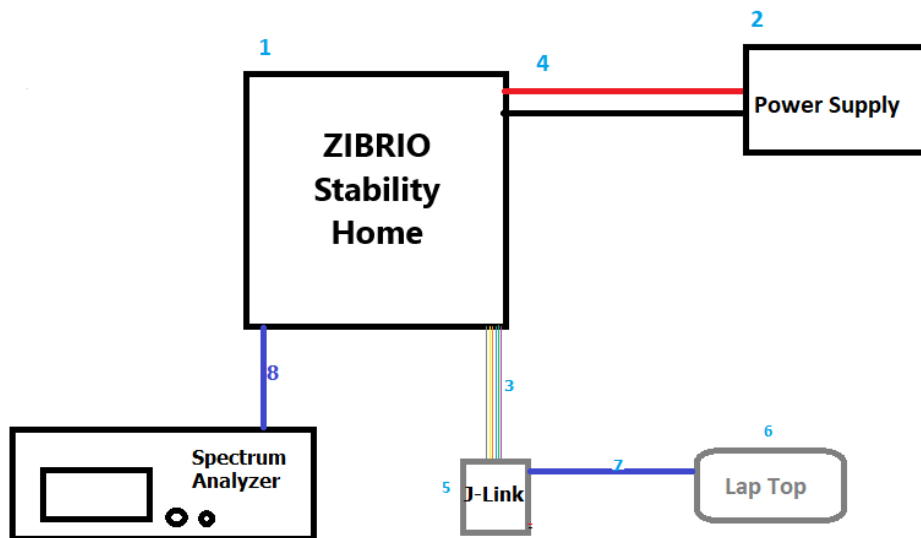


Figure 1. Block Diagram of Test Configuration

F. Equipment Configuration

The EUT was set up as outlined in Figure 1, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

Ref. ID	Slot #	Name / Description	Model Number	Part Number	Serial Number	Rev. #
1	---	ZIBRIO Stability Home (Radiated Sample)	C202002-002	---	---	---
1	---	ZIBRIO Stability Home (Conducted Sample)	C202002-003	---	---	---

Table 5. Equipment Configuration

G. Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

Ref. ID	Name / Description	Manufacturer	Model Number	*Customer Supplied Calibration Data
2	AC/DC Medical Adapter	Delta Medicals Inc.	MDS-030AAC12	N/A
5	J-link	SEGGER	2610002700	N/A
6	Laptop	Dell	Inspiron 15	N/A

The 'Customer Supplied Calibration Data' column will be marked as either not applicable, not available, or will contain the calibration date supplied by the customer.

Table 6. Support Equipment

H. Ports and Cabling Information

Ref. ID	Port name on EUT	Cable Description or reason for no cable	Qty	Length as tested (m)	Max Length (m)	Shielded? (Y/N)	Termination Box ID & Port Name
4	Power Supply	Powering up the EUT	1	1	--	No	AC Mains
3	Debug Port	For programming the EUT	1	0.5	--	No	J-Link
8	SMA Connector	Testing and Monitoring	1	0.1	--	No	Spectrum Analyzer

Table 7. Ports and Cabling Information

I. Mode of Operation

The unit was placed in the chamber for radiated tests and on a Bench top for conducted tests. The EUT was configured to transmit continuously on the 3 channels Low (2402 MHz), Mid (2440 MHz) and High (2480 MHz) by flashing the unit with Hex files that correspond to the channels respectively.

J. Method of Monitoring EUT Operation

The EUT is flashed with Hex file containing the channel of measurement on highest duty cycle possible using JTAG development Kit. For radiated measurements, the receiving antenna is connected to an EMI Receiver that tuned to frequency of interest to verify the EUT is transmitting on the frequency of interest. For Conducted Measurements, a conducted measurement sample fitted with SMA connector is provided. The SMA port is connected to the Spectrum Analyzer that tuned to frequency of interest to verify the EUT is transmitting on the frequency of interest.

K. Modifications**a) Modifications to EUT**

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the test standard.

L. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Zibrio, Inc. upon completion of testing.

III. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.203 Antenna Requirement

Test Requirement: § 15.203: An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

Results: The EUT has an integral antenna that is permanently attached to the unit and the EUT as tested is compliant the criteria of §15.203.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

Gain	Type	Model	Manufacturer
5.05 dBi	Ceramic Chip Antenna	ANT3216LL00R2400A	YAGEO

Table 8. Antenna List

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207(a) Conducted Emissions Limits

Test Requirement(s): § 15.207 (a): 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 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω 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.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB μ V)	
	Quasi-Peak	Average
* 0.15- 0.5	66 - 56	56 - 46
0.5 - 5	56	46
5 - 30	60	50

Table 9. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Procedure: The EUT was placed on a 0.8 m-high non-conductive table. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50 Ω /50 μ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with *ANSI C63.10-2013*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50 Ω /50 μ H LISN as the input transducer to an EMC Receiver.

Test Results: The EUT was found compliant with this requirement §15207(a).

Test Engineer(s): Adan Arab

Test Date(s): 03/30/2020

15.207(a) Conducted Emissions Test Results

Line	Freq (MHz)	QP Amplitude (dBμV)	QP Limit (dBμV)	Margin (dB)	Pass/Fail	Average Amplitude (dBμV)	Average Limit (dBμV)	Margin (dB)	Pass/Fail
Line_120VAC 60Hz	0.346	26.9	59.077	-32.177	Pass	19.4	49.077	-29.677	Pass
Line_120VAC 60Hz	1.250	24	56	-32	Pass	19	46	-27	Pass
Line_120VAC 60Hz	24.002	28.9	60	-31.1	Pass	26.7	50	-23.3	Pass
Line_120VAC 60Hz	0.354	23.7	58.888	-35.188	Pass	18.9	48.888	-29.988	Pass
Line_120VAC 60Hz	1.118	23.4	56	-32.6	Pass	18.7	46	-27.3	Pass
Line_120VAC 60Hz	1.054	23.2	56	-32.8	Pass	18.4	46	-27.6	Pass

Table 10. Conducted Emissions, 15.207(a), Phase Line, Test Results

Note 1: * - At this frequency, the measured electric-field strength exhibits a margin of compliance that is less than 3 dB below the specification limit. We recommend that every emission measured, have at least a 3 dB margin to allow for deviations in the emission characteristics that may occur during the production process.

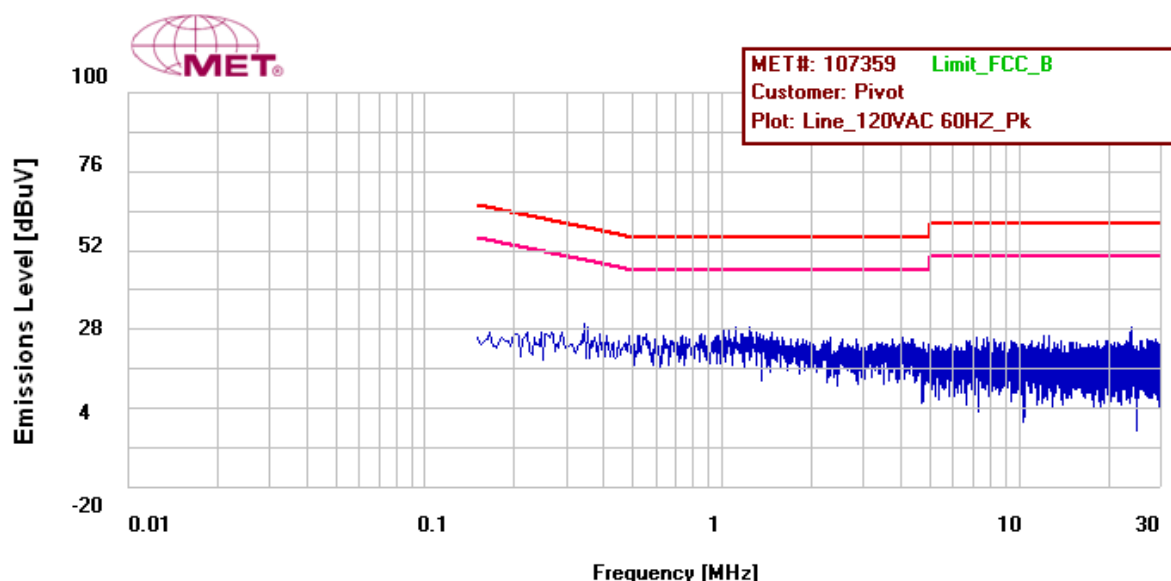


Figure 2: Conducted Emissions, 15.207(a), Phase Line

15.207(a) Conducted Emissions Test Results

Line	Freq (MHz)	QP Amplitude (dBμV)	QP Limit (dBμV)	Margin (dB)	Pass/Fail	Average Amplitude (dBμV)	Average Limit (dBμV)	Margin (dB)	Pass/Fail
Neutral_120VAC 60Hz	0.298	24.4	60.314	-35.914	Pass	19.4	50.314	-30.914	Pass
Neutral_120VAC 60Hz	0.494	27.7	56.103	-28.403	Pass	24.7	46.103	-21.403	Pass
Neutral_120VAC 60Hz	24.002	28.7	60	-31.3	Pass	26.5	50	-23.5	Pass
Neutral_120VAC 60Hz	20.002	28.6	60	-31.4	Pass	27.2	50	-22.8	Pass
Neutral_120VAC 60Hz	0.238	25.7	62.176	-36.476	Pass	20.6	52.176	-31.576	Pass
Neutral_120VAC 60Hz	0.934	23	56	-33	Pass	18.3	46	-27.7	Pass

Table 11. Conducted Emissions, 15.207(a), Neutral Line, Test Results

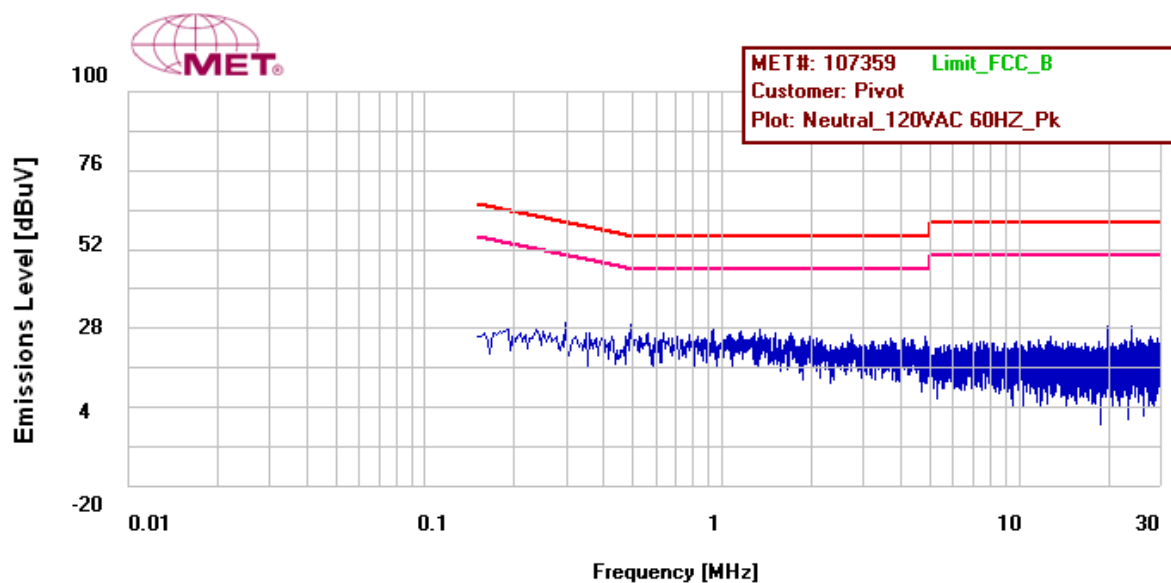


Figure 3: Conducted Emissions, 15.207(a), Neutral Line

15.207(a) Conducted Emissions Test Setup Photo



Figure 4. Conducted Emissions, 15.207(a), Test Setup, Front View

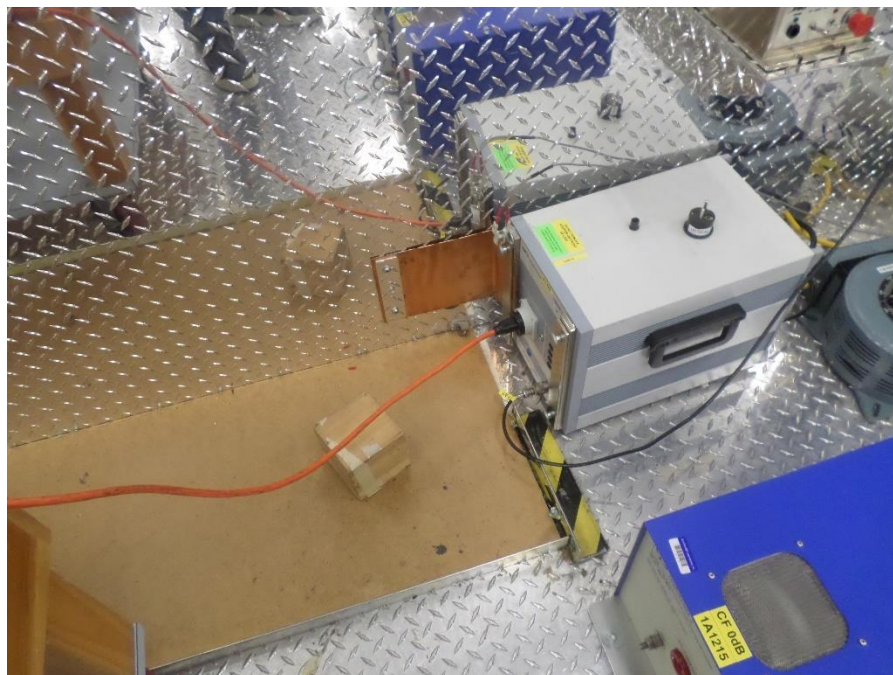


Figure 5. Conducted Emissions, 15.207(a), Test Setup, LISN View

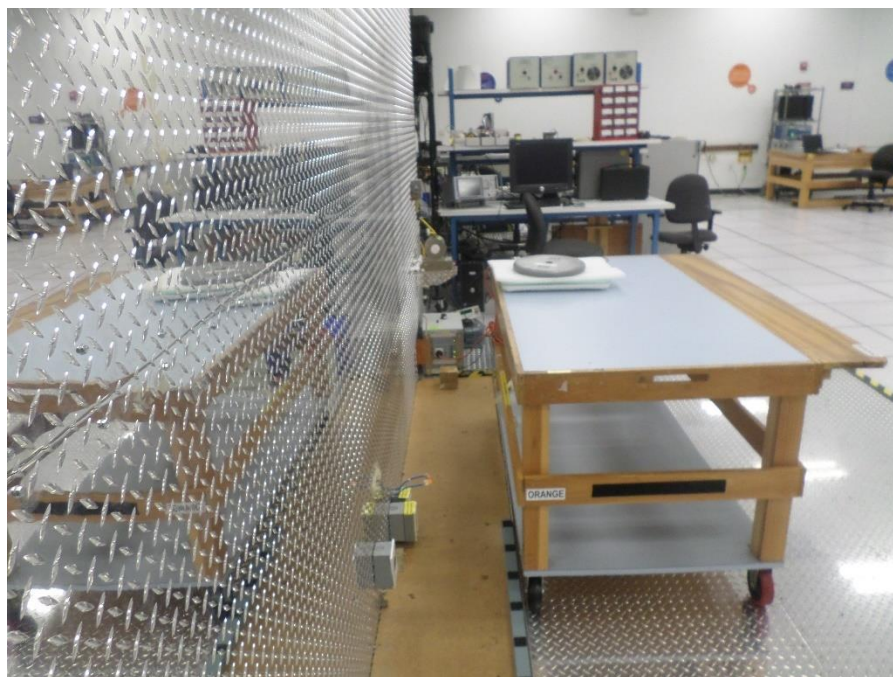


Figure 6. Conducted Emissions, 15.207(a), Test Setup, Rear View

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(2) 6 dB Bandwidth

Test Requirements: § 15.247(a)(2): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

Test Procedure: The EUT was connected to a spectrum analyzer through a cable and an attenuator. Measurements were taken with the EUT set to transmit continuously on its low, mid, and high channels for all its bandwidths. The 6dB bandwidth was measured according to measurement method 11.8.2 Option 2 of ANSI C63.10-2013.

Test Results The EUT was compliant with § 15.247 (a)(2).

The 6 dB Bandwidth was determined from the plots on the following pages.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

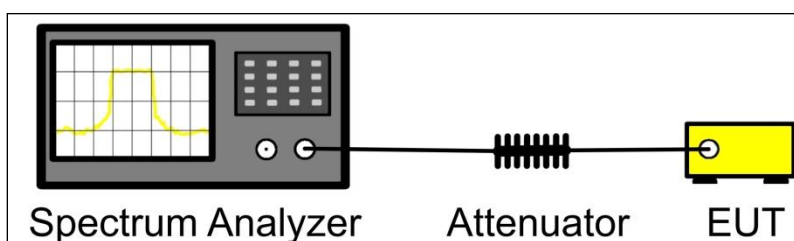


Figure 7. Block Diagram, Occupied Bandwidth Test Setup

Occupied Bandwidth Test Results

Occupied Bandwidth			
Carrier Channel	Frequency (MHz)	Measured 6 dB Bandwidth (MHz)	Limit (MHz)
Low	2402	1.317	≥ 0.500
Mid	2440	1.315	≥ 0.500
High	2480	1.319	≥ 0.500

Table 12. 6 dB Occupied Bandwidth, Test Results

6 dB Occupied Bandwidth Test Results

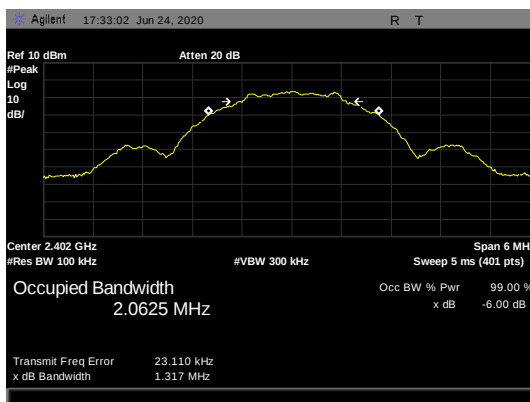


Figure 8: 6 dB Occupied Bandwidth, 2402 MHz - 1.317 MHz

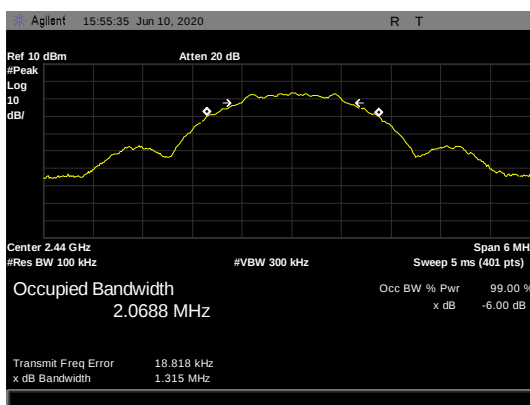


Figure 9: 6 dB Occupied Bandwidth, 2440 MHz - 1.315 MHz

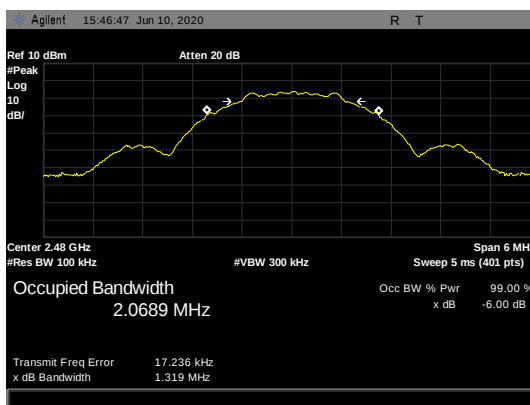


Figure 10: 6 dB Occupied Bandwidth, 2480 MHz - 1.319 MHz

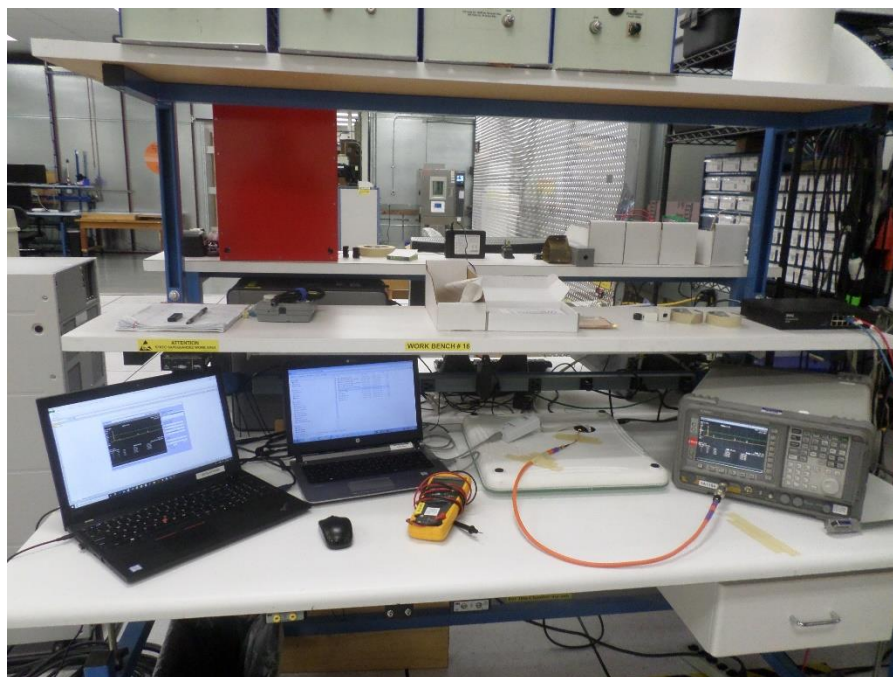


Figure 11: Occupied Bandwidth, Setup Photo

Electromagnetic Compatibility Criteria for Intentional Radiators

Duty Cycle

Test Procedure: The EUT was connected to a spectrum analyzer and was ran at the maximum achievable duty cycle for all modes. The duty cycle was measured in accordance with section 11.6 of ANSI C63.10-2013.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

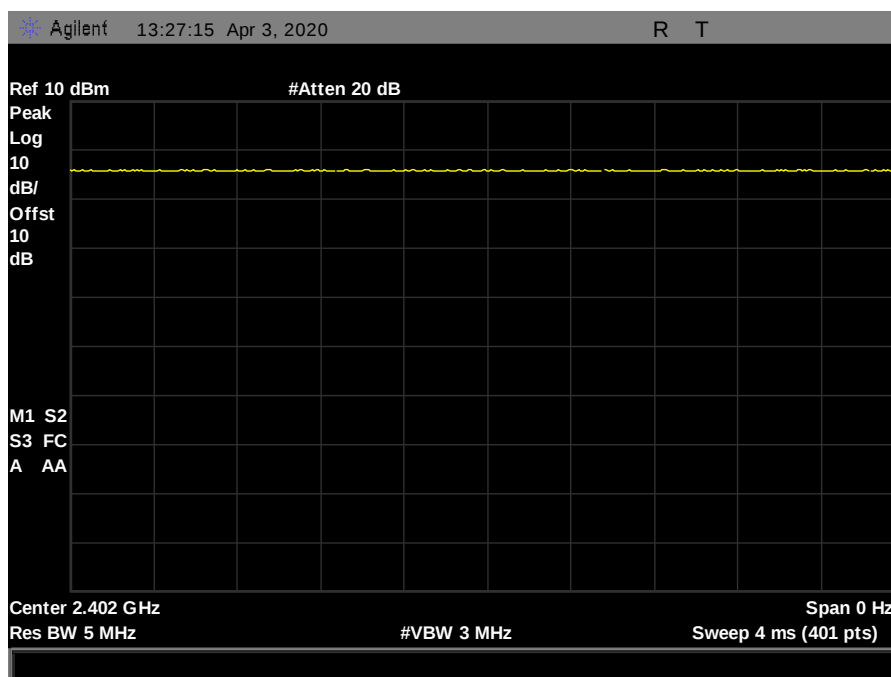


Figure 12: Duty Cycle, BLE, 2402 MHz, $\geq 98\%$

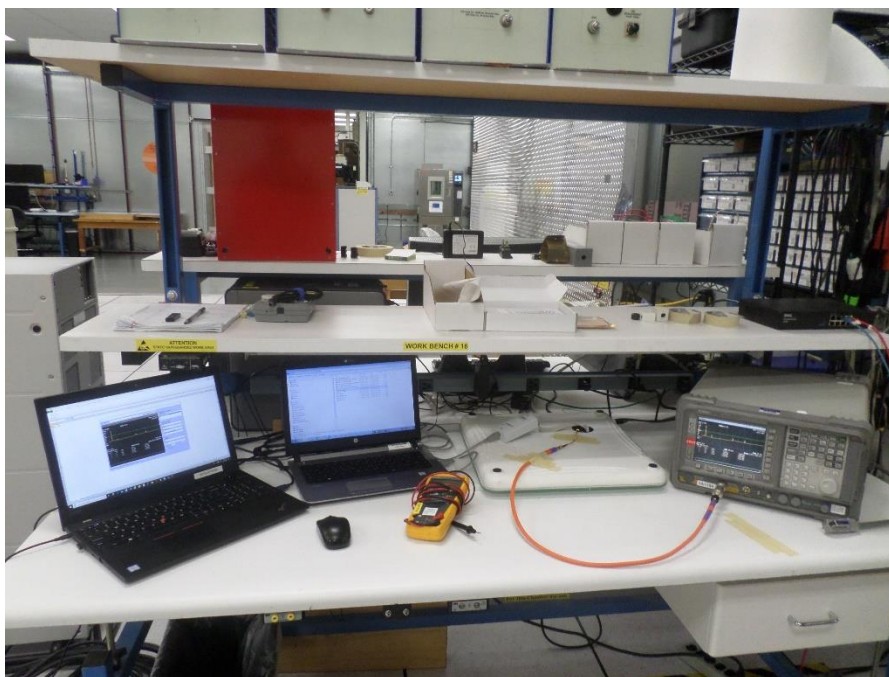


Figure 13: Duty Cycle, Setup Photo

§ 15.247(b) Conducted Power Output

Test Requirements: §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

§15.247(b)(3): For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the 1 Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

§15.247(b)(4): The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Test Procedure: The EUT was connected to a spectrum analyzer through a cable and an attenuator. Measurements were taken with the EUT set to transmit continuously on its low, mid, and high channels for all its bandwidths at maximum power. Power was measured according to measurement method, as described in ANSI C63.10-2013, section 11.9.1.2. Attenuator, cable loss, and duty factor were programmed into the spectrum analyzer.

Test Results: The EUT was compliant with the Peak Power Output limits of §15.247(b). The test data and the plots are recorded in the following pages.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

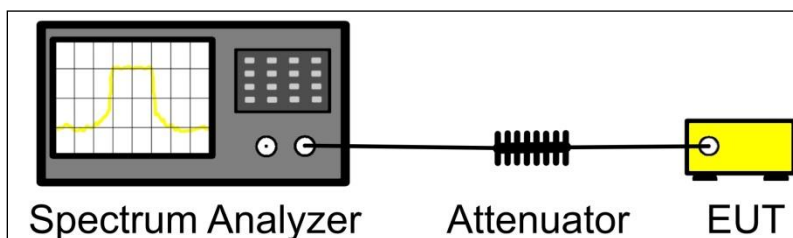


Figure 14. Power Output Test Setup

Peak Conducted Power Output Test Results

Peak Conducted Output Power			
Carrier Channel	Channel (MHz)	Peak Output Power (dBm)	Limit (dBm)
Low	2402	-2.16	30
Mid	2440	-1.62	30
High	2480	-2.07	30

Table 13. Peak Conducted Power Output, Test Results

Peak Conducted Power Output Test Results

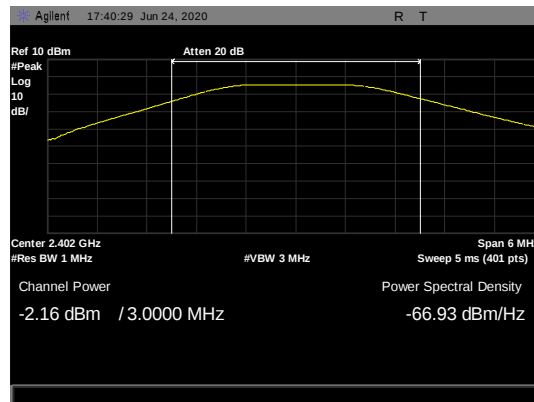


Figure 15: Peak Output Power, 2402 MHz - (-2.16 dBm)

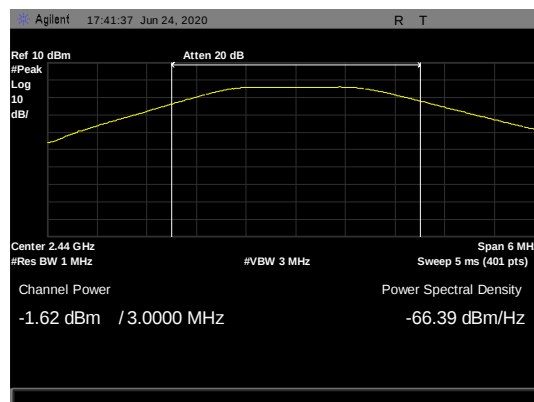


Figure 16: Peak Output Power, 2440 MHz - (-1.62 dBm)

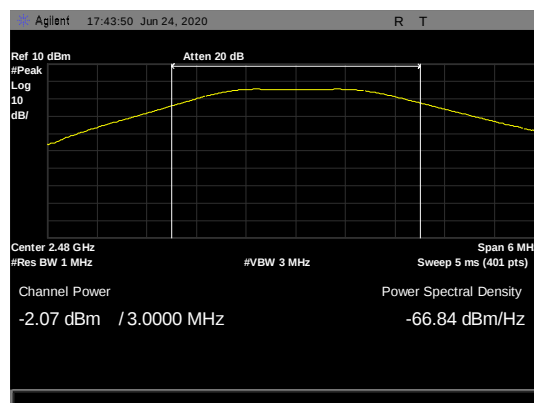


Figure 17: Peak Output Power, 2480 MHz - (-2.07 dBm)

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.209 Radiated Spurious Emissions Requirements and Band Edge

Test Requirements: §15.247(d); §15.205: Emissions outside the frequency band.

§15.205(a): Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090–0.110-----	16.42–16.423	399.9–410	4.5–5.15
¹ 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358	36.43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	(²)
13.36–13.41			

Table 14. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

Test Requirement(s): § 15.209 (a): Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in Table 15.

Frequency (MHz)	§ 15.209(a), Radiated Emission Limits (dBμV) @ 3m
30 - 88	40.00
88 - 216	43.50
216 - 960	46.00
Above 960	54.00

Table 15. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)

Test Procedures: The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line. Only noise floor was measured above 18 GHz.

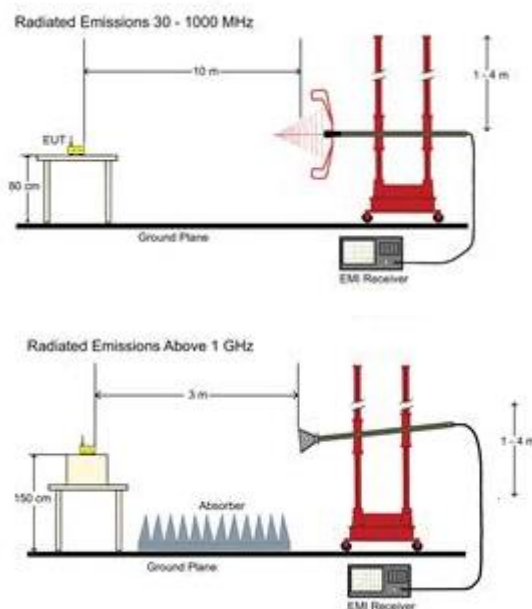


Figure 18: Radiated Emissions Test Setup

Test Results: The EUT was compliant with the Radiated Spurious Emission limits of § 15.247(d) and § 15.209. A Peak detector measurement is compared on both Peak and average limit which is the worst case.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

Radiated Spurious Emissions, Test Results

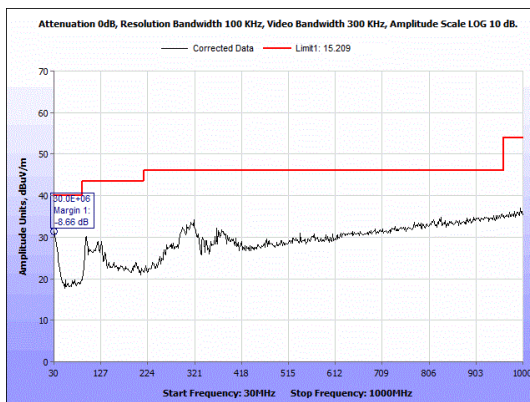


Figure 19: Radiated Spurious Emissions, 2402 MHz - 30-1000 MHz - Horizontal.

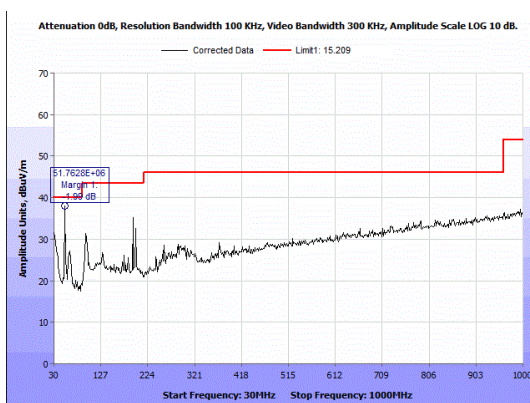


Figure 20: Radiated Spurious Emissions, 2402 MHz - 30-1000 MHz - Vertical.

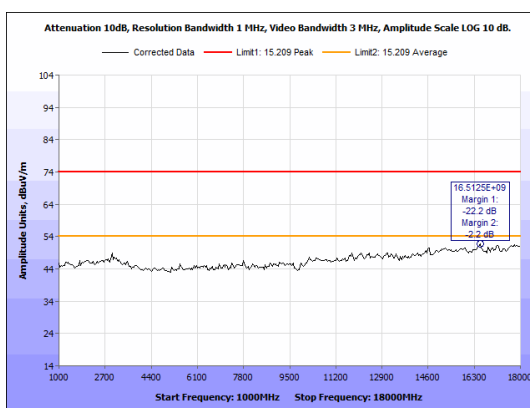


Figure 21: Radiated Spurious Emissions, 2402 MHz - 1-18 GHz - Peak - Horizontal.

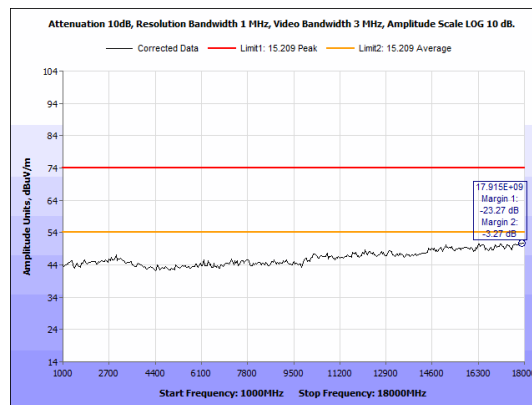


Figure 22: Radiated Spurious Emissions, 2402 MHz - 1-18 GHz - Peak - Vertical.

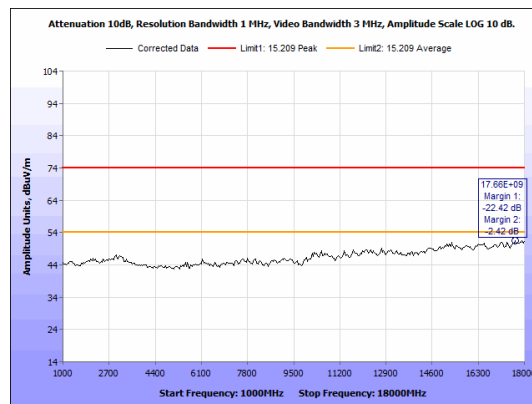


Figure 23: Radiated Spurious Emissions, 2440 MHz - 1-18 GHz - Peak - Horizontal.

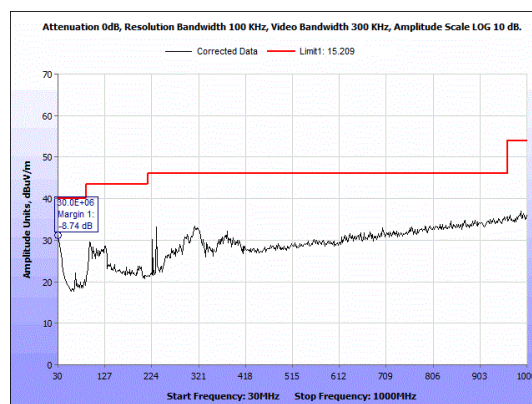


Figure 24: Radiated Spurious Emissions, 2440 MHz - 30-1000 MHz - Horizontal.

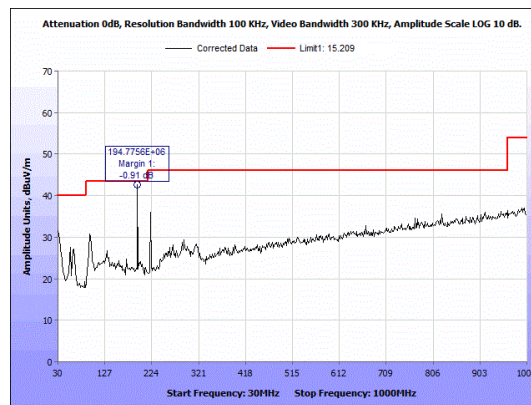


Figure 25: Radiated Spurious Emissions, 2440 MHz - 30-1000 MHz - Vertical.

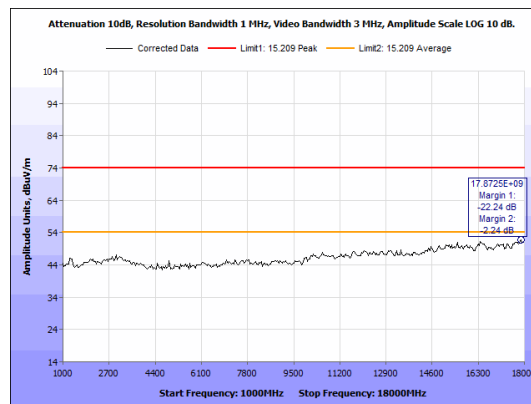


Figure 26: Radiated Spurious Emissions, 2440 MHz - 1-18 GHz - Peak - Vertical.

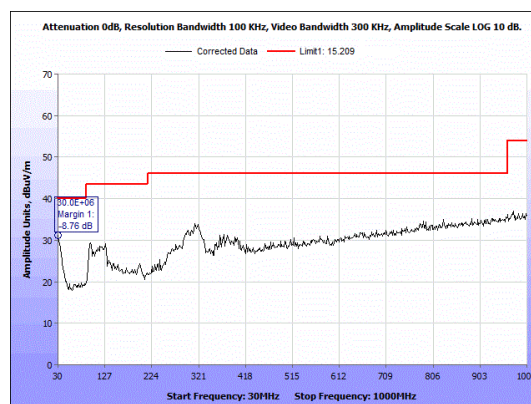


Figure 27: Radiated Spurious Emissions, 2480 MHz - 30-1000 MHz - Horizontal.

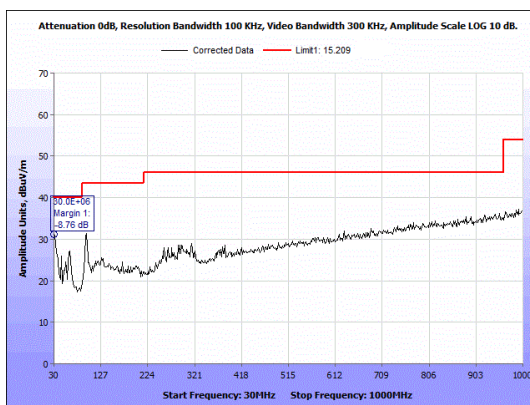


Figure 28: Radiated Spurious Emissions, 2480 MHz - 30-1000 MHz - Vertical.

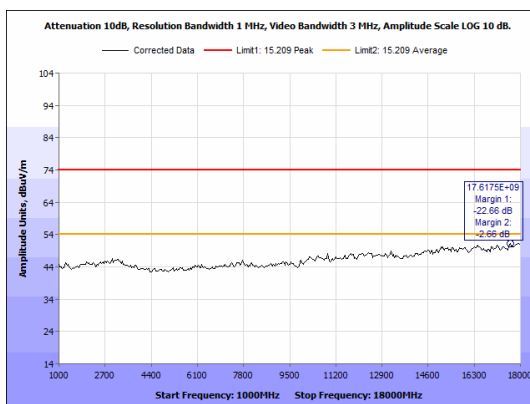


Figure 29: Radiated Spurious Emissions, 2480 MHz - 1-18 GHz - Peak - Horizontal.

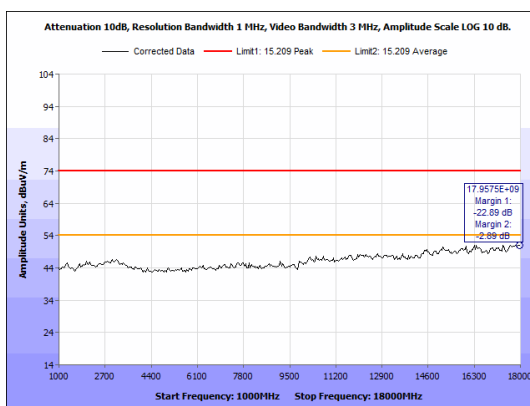


Figure 30: Radiated Spurious Emissions, 2480 MHz - 1-18 GHz - Peak - Vertical.

Radiated Band Edge Measurements

Test Procedures: The transmitter was turned on. Measurements were performed of the low and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line.

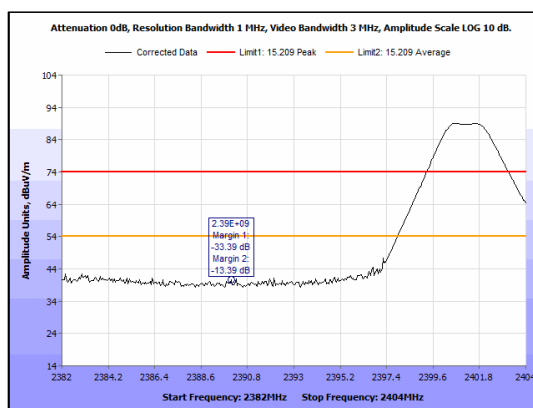


Figure 31: Radiated Band Edge, 2402 MHz - Peak - Horizontal.

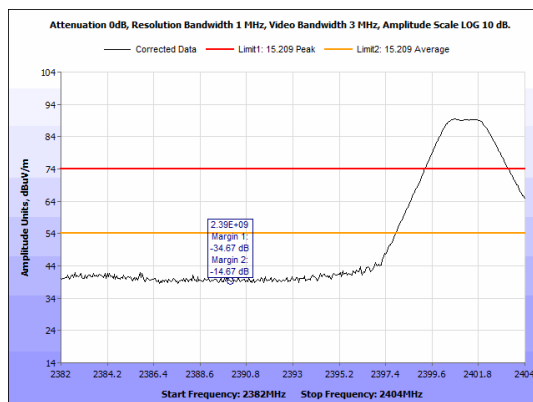


Figure 32: Radiated Band Edge, 2402 MHz - Peak - Vertical.

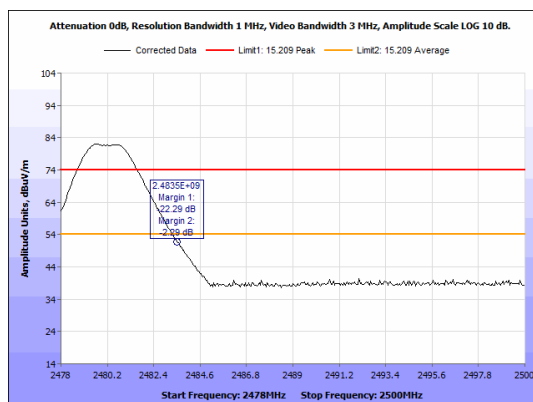


Figure 33: Radiated Band Edge, 2480 MHz - Peak - Horizontal.

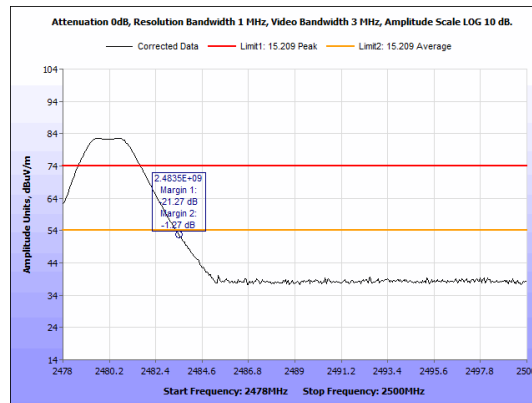


Figure 34: Radiated Band Edge, 2480 MHz - Peak - Vertical.

Radiated Spurious Emissions Test Setup



Figure 35: Radiated Emissions - 30-1000 MHz- Setup Antenna View

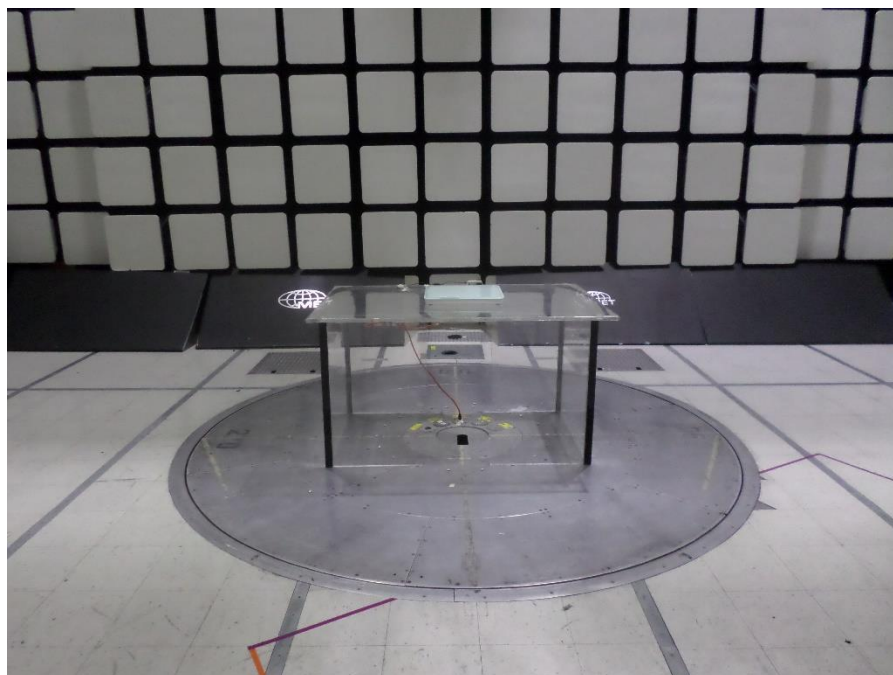


Figure 36: Radiated Emissions - 30-1000 MHz- Setup Front View

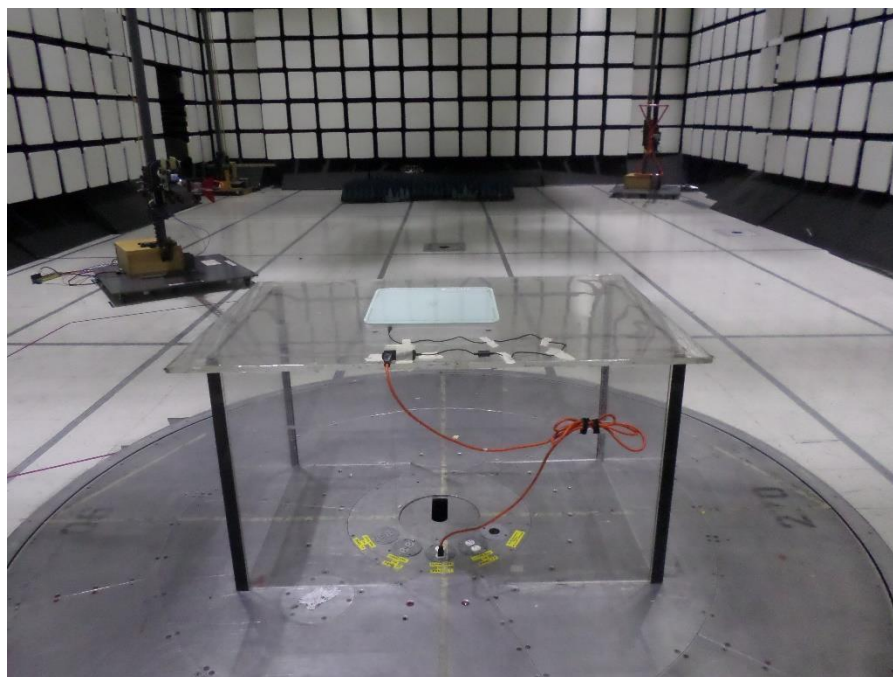


Figure 37: Radiated Emissions - 30-1000 MHz- Setup Rear View

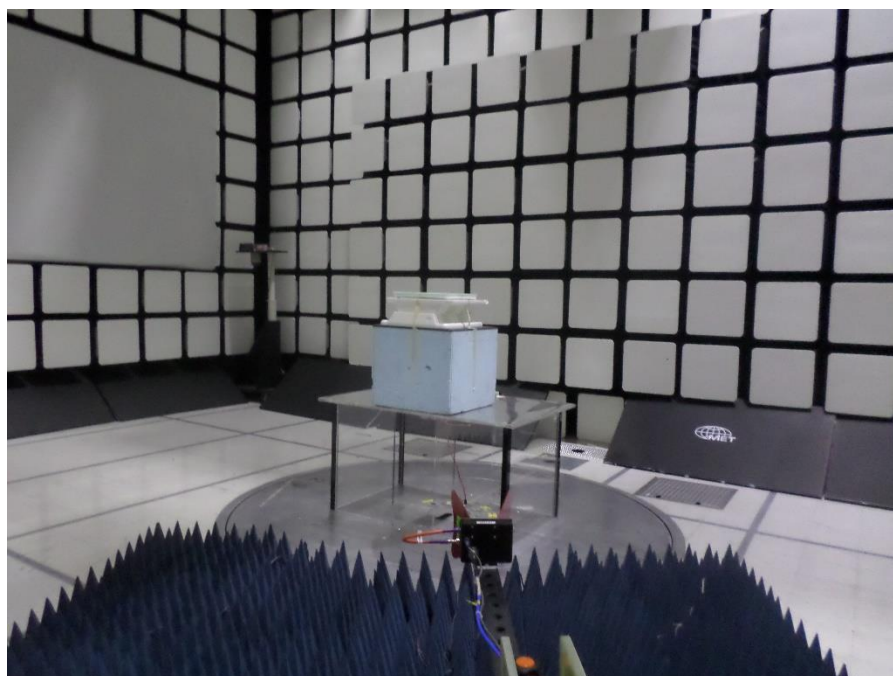


Figure 38: Radiated Emissions - 1-18 GHz- Setup Antenna View

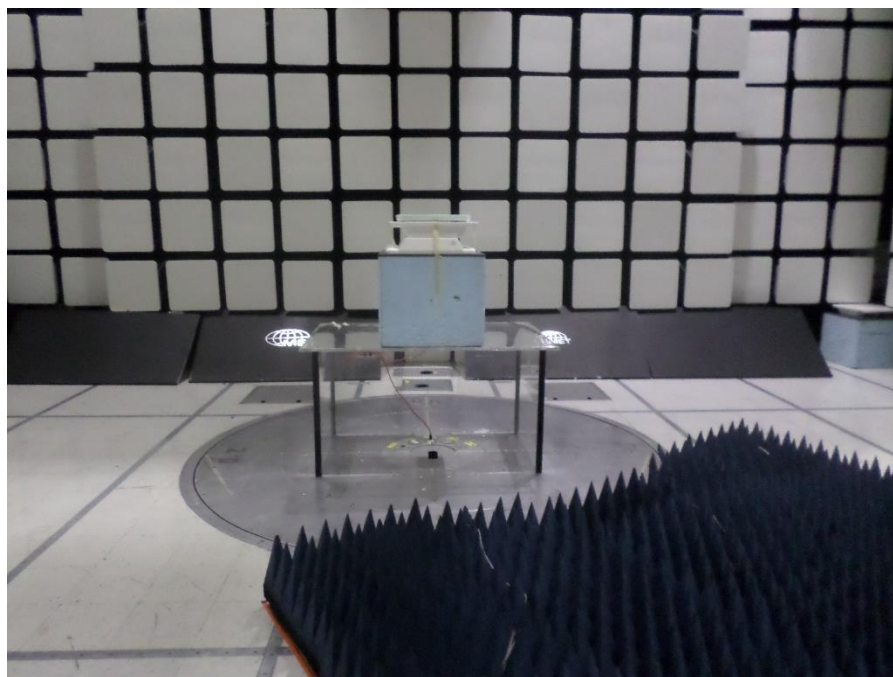


Figure 39: Radiated Emissions - 1-18 GHz- Setup Front View

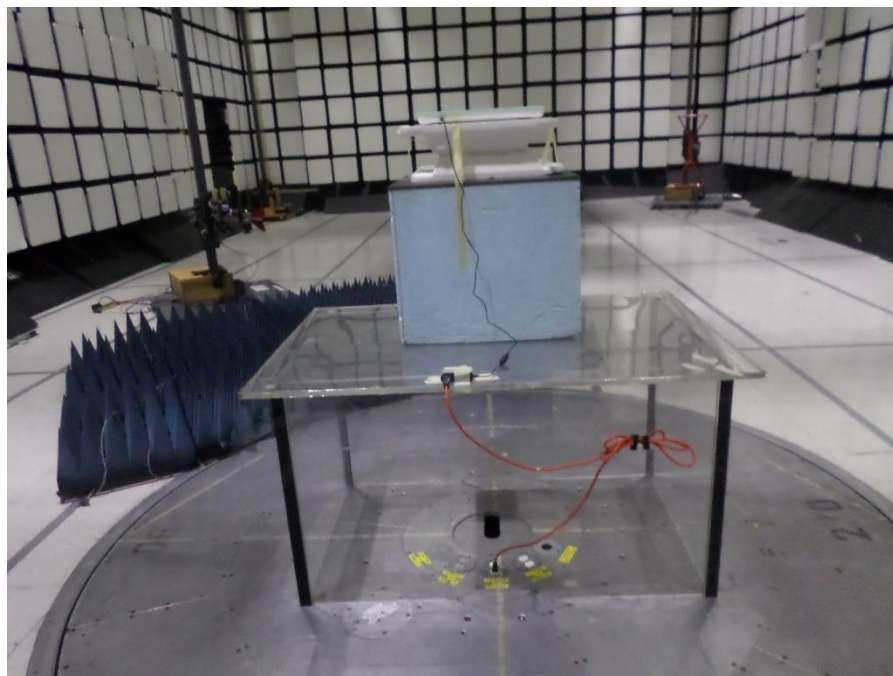


Figure 40: Radiated Emissions - 1-18 GHz- Setup Rear View

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Spurious Emissions in Non-restricted Bands

Test Requirement: **15.247(d)** In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB.

Test Procedure: For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

The EUT was connected to a spectrum analyzer through a cable and an attenuator. Measurements were taken with the EUT set to transmit continuously on its low, mid, and high channels for all its bandwidths at maximum power. Conducted spurious emissions were measured according to sections 11.11.2 and 11.11.3 of ANSI C63.10-2013.

Test Results: The EUT was compliant with the Spurious Emission limits of **§15.247(d)**.

Test Engineer(s): Adan Arab

Test Date(s): 04/03/2020

Spurious Emissions in Non-restricted Bands, Test Results

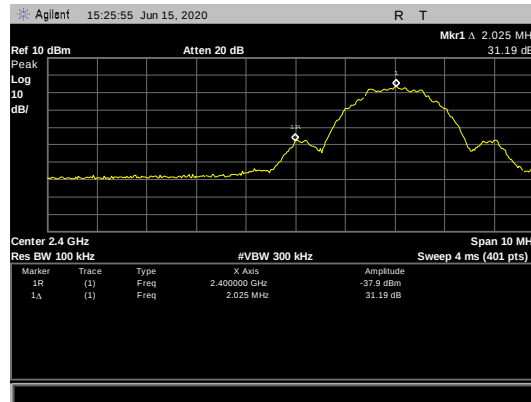


Figure 41: Conducted Band Edge, 2402 MHz

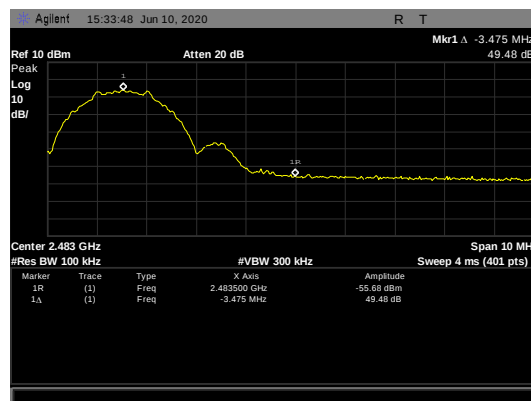


Figure 42: Conducted Band Edge, 2480 MHz

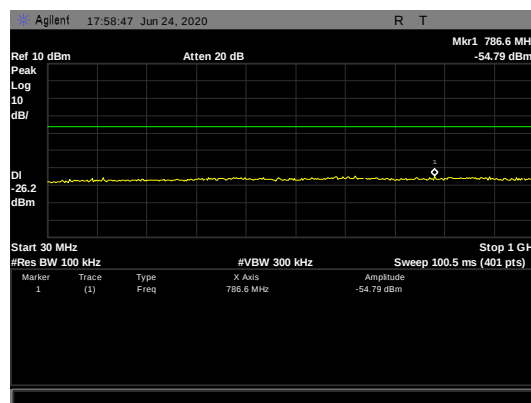


Figure 43: Conducted Spurious Emissions, 2402 MHz - 30-10000 MHz

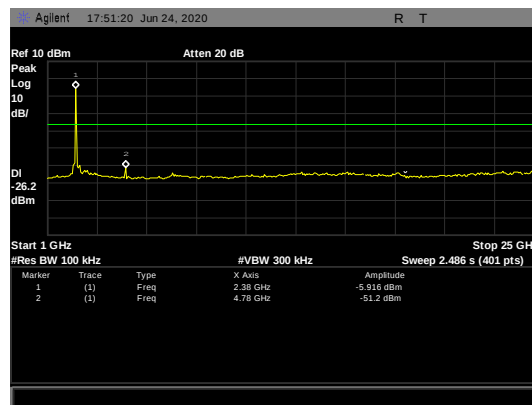


Figure 44: Conducted Spurious Emissions, 2402 MHz - 1-25 GHz

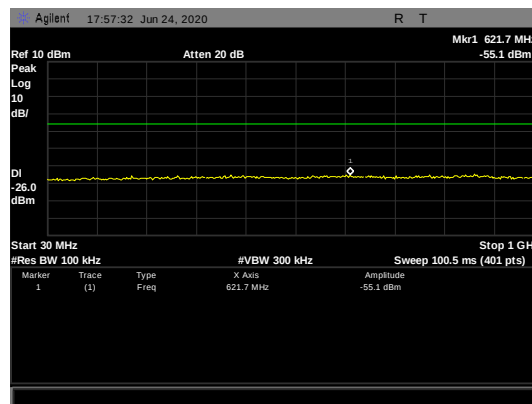


Figure 45: Conducted Spurious Emissions, 2440 MHz - 30-1000 MHz

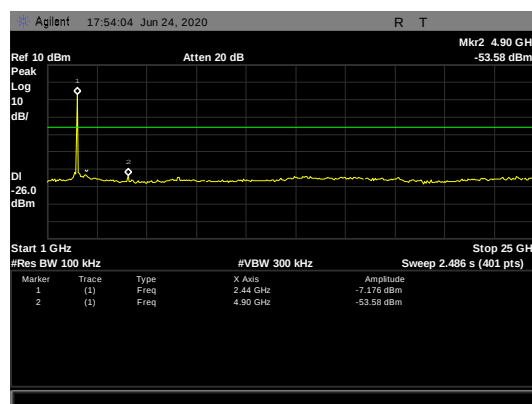


Figure 46: Conducted Spurious Emissions, 2440 MHz - 1-25 GHz

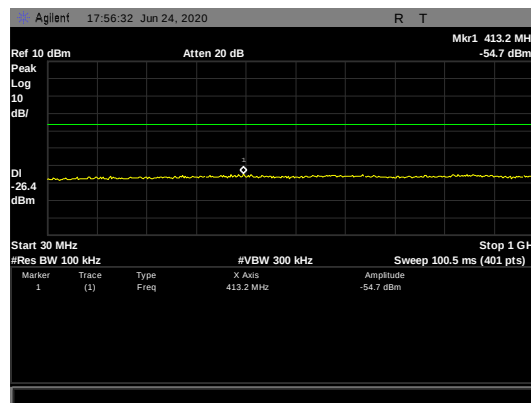


Figure 47: Conducted Spurious Emissions, 2480 MHz - 30-1000 MHz

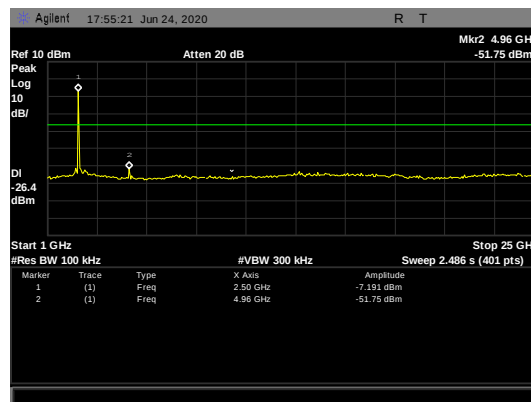


Figure 48: Conducted Spurious Emissions, 2480 MHz - 1-25 GHz

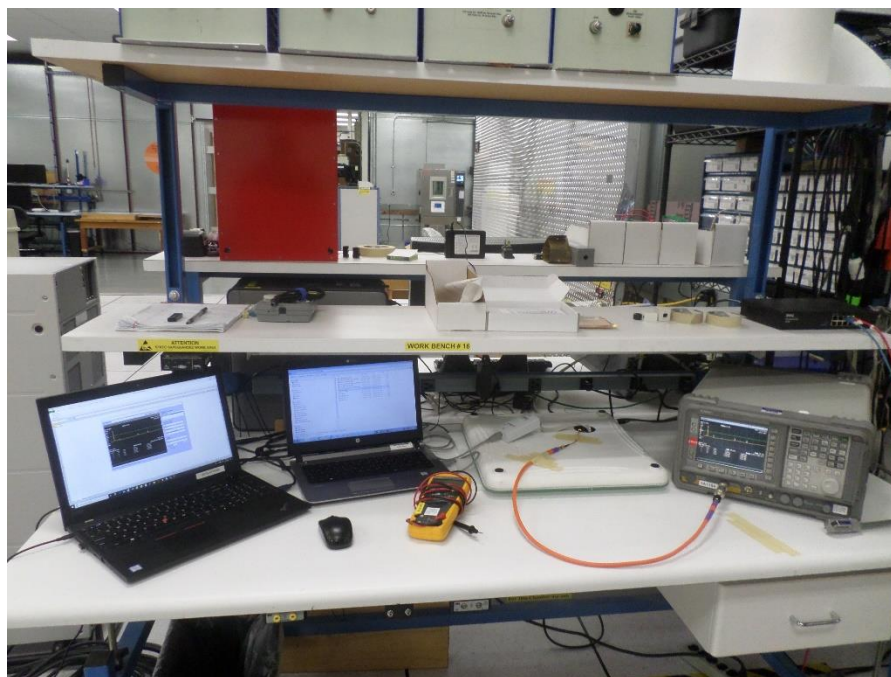


Figure 49: Conducted Spurious Emissions, Setup Photo

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(e) Power Spectral Density

Test Requirements: §15.247(e): For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8dBm in any 3 kHz band during any time interval of continuous transmission.

Test Procedure: The EUT was connected to a spectrum analyzer through a cable and an attenuator. Measurements were taken with the EUT set to transmit continuously on its low, mid, and high channels for all its bandwidths at maximum power. Power spectral density was measured according to measurement method Peak PSD, as described in ANSI C63.10-2013, section 11.10.2. Attenuator, cable loss, and duty factor were programmed into the spectrum analyzer.

Test Results: The EUT was compliant with the peak power spectral density limits of § 15.247 (e).
The peak power spectral density was determined from plots on the following page(s).

Test Engineer: Adan Arab

Test Date: 04/03/2020

Peak Power Spectral Density Test Results

Carrier Channel	Channel (MHz)	Power Density (dBm)	Limit (dBm/3KHz)
Low	2402	-6.2	8
Mid	2440	-6.01	8
High	2480	-6.403	8

Table 16. Power Spectral Density, Test Results

Power Spectral Density

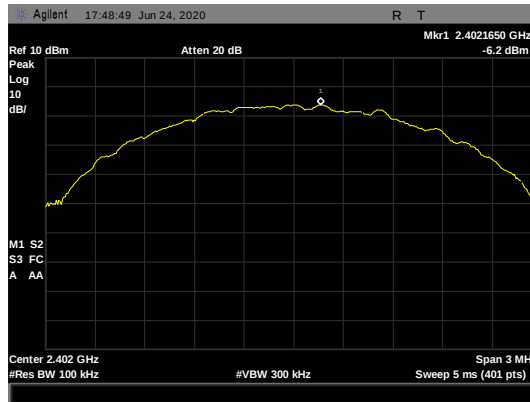


Figure 50: Peak Power Spectral Density, 2402 MHz - (-6.2 dBm)

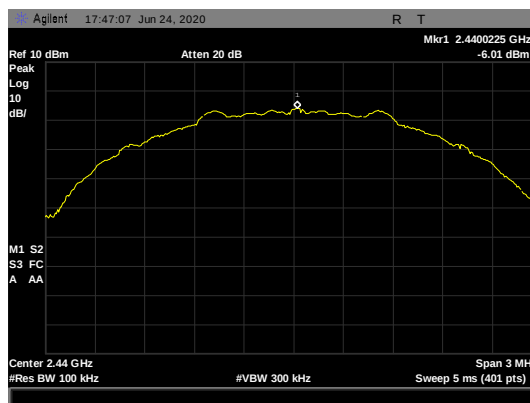


Figure 51: Peak Power Spectral Density, 2440 MHz - (-6.01 dBm)

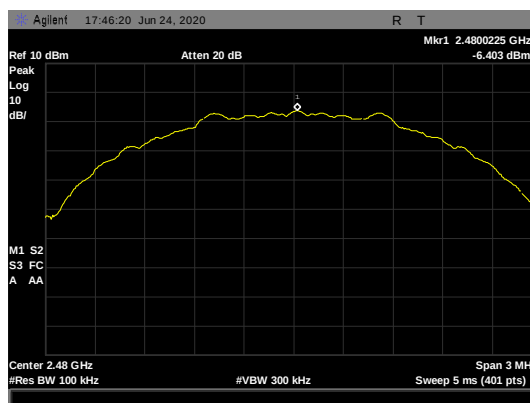


Figure 52: Peak Power Spectral Density, 2480 MHz - (-6.403 dBm)

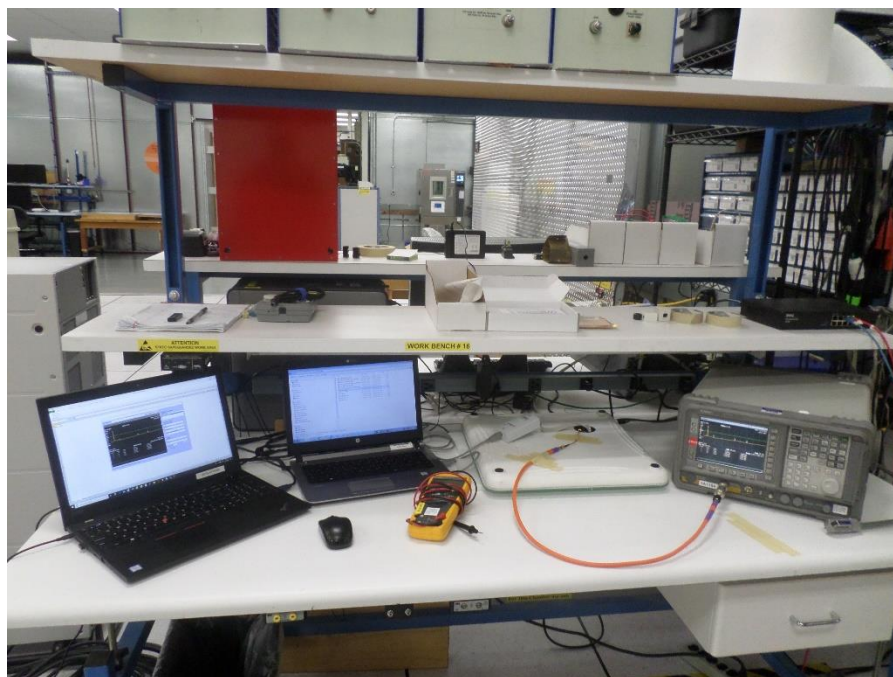


Figure 53: Peak Power Spectral Density, Setup Photo

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(i) Maximum Permissible Exposure

RF Exposure Requirements: §1.1307(b)(1) and §1.1307(b)(2): Systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: §1.1310: As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

Test Results:

Bluetooth Low Energy (2.4 GHz)

Frequency (MHz)	Con. Pwr. (dBm)	Tuneup tolerance (dB)	Con. Pwr. Including Tuneup Tolerance (mW)	Calculated SAR Threshold	1.0-g SAR Limit	Margin	Separation Distance Declared (mm)	Result
2440	-1.62	1.0	1.95	0.609	3.0	-2.391	5	Pass

Figure 54: RF Human Exposure, Test Results

Per KDB 447498, Section 4.3.1 (a), applicable for 100 MHz to 6 GHz and test separation distances ≤ 50 mm:

$$\frac{\text{max. power of channel, including tuneup tolerance [mW]}}{\text{min. test separation distance [mm]}} * \sqrt{f \text{ [GHz]}} \leq 3.0 \text{ (1 - g SAR Limit)}$$

$$\frac{1.95 \text{ mW}}{5 \text{ mm}} * \sqrt{2.440} = 0.609 \leq 3.0 \text{ (1 - g SAR)}$$

The safe distance where Power Density is less than the MPE Limit listed above was found to be 5 mm.

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2017.

MET Asset #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1A1190	Temperature Humidity Pressure Sensor/Recorder	Omega	PRHTEMP2000	04/15/2019	04/15/2020
1A1141	Spectrum Analyzer	Agilent Technologies	E4407B	08/05/2019	08/05/2020
1A1083	EMI Test Receiver	Rohde & Schwarz	ESU40	10/10/2019	10/10/2020
1A1147	Bilog Antenna (30-1000 MHz)	Sunol Sciences Corp	JB3	06/05/2019	12/05/2020
1A1183	DOUBLE RIDGED WAVEGUIDE ANTENNA (1-18 GHz)	ETS-LINDGREN	3117	10/10/2018	04/10/2020
1A1099	1A1099	Generator	COM-Power Corp	SEE NOTE	
1A1044	1A1044	Generator	COM-Power Corp	SEE NOTE	
1A1088	PRE-AMP	ROHDE & SCHWARZ	TS-PR1	SEE NOTE	
1A1080	MULTI-DEVICE CONTROLLER	ETS-EMCO	2090	SEE NOTE	
1A1073	MULTI-DEVICE CONTROLLER	ETS-EMCO	2090	SEE NOTE	
1A1180	PRE-AMP	MITEQ	AMF-7D-01001800-22-10P	SEE NOTE	
1A1106	10M SEMI-ANECHOIC CHAMBER	LINDGREN	N/a	SEE NOTE	

Table 17. Test Equipment List

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing;*
 - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
 - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer, be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.*
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
 - (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
 - (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
 - (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
 - (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

(a) *In addition to the requirements in Part 2 of this chapter, a device subject to certification or verification shall be labeled as follows:*

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

- (4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified under paragraph (a) of this section is required to be affixed only to the main control unit.

- (5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

§ 15.21 Information to user.

The user's manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

End of Report