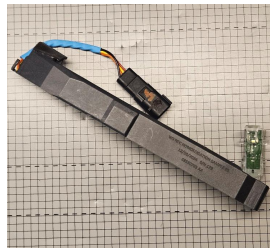


# EMC Test Report

regarding

**USA: CFR Title 47, Part 15.225** (Emissions)  
**Canada: RSS-210v11/GENv5** (Emissions)

for



## VASWSNFC

**Category: Vehicular NFC Transmitter**

Judgments:

**Aligns with FCC Part 15.225 and ISSED RSS-210v11**

Testing Completed: May 8, 2025



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Revision History

Rev. No.	Date	Details	Revised By
r0	May 9, 2025	Initial Release.	J. Nantz
r1	May 19, 2025	Clarify definition of CM.	J. Nantz
r2	May 20, 2025	Added reference to RSS-210 Annex B	J. Nantz

Contents

Revision History	2
Table of Contents	2
1 Test Report Scope and Limitations	4
1.1 Laboratory Authorization . . . . .	4
1.2 Report Retention . . . . .	4
1.3 Subcontracted Testing . . . . .	4
1.4 Test Data . . . . .	4
1.5 Limitation of Results . . . . .	4
1.6 Copyright . . . . .	4
1.7 Endorsements . . . . .	4
1.8 Test Location . . . . .	5
1.9 Traceability and Equipment Used . . . . .	5
2 Test Specifications and Procedures	6
2.1 Test Specification and General Procedures . . . . .	6
3 Configuration and Identification of the Equipment Under Test	7
3.1 Description and Declarations . . . . .	7
3.1.1 EUT Configuration . . . . .	8
3.1.2 Modes of Operation . . . . .	8
3.1.3 Variants . . . . .	8
3.1.4 Test Samples . . . . .	8
3.1.5 Functional Exerciser . . . . .	8
3.1.6 Modifications Made . . . . .	8
3.1.7 Production Intent . . . . .	8
3.1.8 Declared Exemptions and Additional Product Notes . . . . .	8
4 Emissions	9
4.1 General Test Procedures . . . . .	9
4.1.1 Radiated Test Setup and Procedures . . . . .	9
4.1.2 Power Supply Variation . . . . .	11
4.2 Intentional Emissions . . . . .	12
4.2.1 Fundamental Emission Pulsed Operation . . . . .	12
4.2.2 Fundamental Emission Bandwidth . . . . .	14
4.2.3 Fundamental Emission . . . . .	16
4.3 Unintentional Emissions . . . . .	17
4.3.1 Transmit Chain Spurious Emissions . . . . .	17
5 Measurement Uncertainty and Accreditation Documents	18

List of Tables

1.8.0 Test Site List. . . . .	5
1.9.0 Equipment List. . . . .	5
3.1.0 EUT Declarations. . . . .	7
4.2.1 Pulsed Emission Characteristics (Duty Cycle). . . . .	12
4.2.2 Intentional Emission Bandwidth. . . . .	14
4.2.3 Fundamental Radiated Emissions. . . . .	16
4.3.1 Transmit Chain Spurious Emissions. . . . .	17
5.0.0 Measurement Uncertainty. . . . .	18

List of Figures

3.1.0 Photos of EUT. . . . .	7
3.1.1 EUT Test Configuration Diagram. . . . .	8
4.1.1 Radiated Emissions Diagram of the EUT. . . . .	9
4.1.1 Radiated Emissions Test Setup Photograph(s). . . . .	10
4.2.1 Example Pulsed Emission Characteristics (Duty Cycle). . . . .	13
4.2.2 Example Intentional Emission Bandwidth. . . . .	15
5.0.0 Accreditation Documents . . . . .	18

# **1 Test Report Scope and Limitations**

## **1.1 Laboratory Authorization**

Test Facility description and attenuation characteristics are on file with the FCC Laboratory, Columbia, Maryland (FCC Reg. No: US5348 and US5356) and with ISED Canada, Ottawa, ON (File Ref. No: 3161A and 24249). Amber Helm Development L.C. holds accreditation under NVLAP Lab Code 200129-0.

## **1.2 Report Retention**

For equipment verified to comply with the regulations herein, the manufacturer is obliged to retain this report with the product records for the life of the product, and no less than ten years. A copy of this Report will remain on file with this laboratory until May 2035.

## **1.3 Subcontracted Testing**

This report does not contain data produced under subcontract.

## **1.4 Test Data**

This test report contains data included within the laboratory's scope of accreditation. Any data in this report that is not covered under the laboratory's scope is clearly identified.

## **1.5 Limitation of Results**

The test results contained in this report relate only to the item(s) tested. Any electrical or mechanical modification made to the test item subsequent to the test date shall invalidate the data presented in this report. Any electrical or mechanical modification made to the test item subsequent to this test date shall require reevaluation.

## **1.6 Copyright**

This report shall not be reproduced, except in full, without the written approval of Amber Helm Development L.C.

## **1.7 Endorsements**

This report shall not be used to claim product endorsement by any accrediting, regulatory, or governmental agency.

## 1.8 Test Location

The EUT was fully tested by **Amber Helm Development L.C.**, headquartered at 92723 Michigan Hwy-152, Sister Lakes, Michigan 49047 USA. Table 1.8.0 lists all sites employed herein. Specific test sites utilized are also listed in the test results sections of this report where needed.

Table 1.8.0 Test Site List.

Description	Location	Quality Num.
OATS (3 meter)	3615 E Grand River Rd., Williamston, Michigan 48895	OATSD

## 1.9 Traceability and Equipment Used

Pertinent test equipment used for measurements at this facility is listed in Table 1.9.0. The quality system employed at Amber Helm Development L.C. has been established to ensure all equipment has a clearly identifiable classification, calibration expiry date, and that all calibrations are traceable to the SI through NIST, other recognized national laboratories, accepted fundamental or natural physical constants, ratio type of calibration, or by comparison to consensus standards. All equipment is evaluated on a cycle no greater than 12 months following laboratory validation procedures and is calibrated following manufacturer recommended intervals.

Table 1.9.0 Equipment List.

Description	Manufacturer/Model	SN	Quality Num.	Cal/Ver By / Date Due
Spectrum Analyzer	R & S / FSW67	103233	RSFSW67	RS / Sept-2025
Spectrum Analyzer	R & S / FPC1500	101692	RSFPC15001	RS / April-2026
Shielded Loop Antenna	EMCO / 6502	9502-2926	EMCOLOOP1	Keysight / Jul-2026
Biconical	EMCO / 93110B	9802-3039	BICEMCO01	Keysight / Aug-2025
BNC-BNC Coax	WRTL / RG58/U	001	CAB001-BLACK	AHD / Sept-2025
6dB Attenuator	Pasternack / PE7087-6	1	ATTEN01	AHD / On-Use

## 2 Test Specifications and Procedures

### 2.1 Test Specification and General Procedures

The goal of Vitesco Technologies GmbH is to demonstrate that the Equipment Under Test (EUT) complies with the Rules and/or Directives below. Detailed in this report are the results of testing the Vitesco Technologies GmbH VASWSNFC for compliance to:

Country/Region/Manu.	Rules or Directive	Referenced Section(s)
United States	Code of Federal Regulations	CFR Title 47, Part 15.225
Canada	ISED Canada	RSS-210v11/GENv5

It has been determined that the equipment under test is subject to the rules and directives above at the date of this testing. In conjunction with these rules and directives, the following specifications and procedures are followed herein to demonstrate compliance (in whole or in part) with these regulations.

ANSI C63.4:2014	"Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz"
ANSI C63.10:2020	"American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices"
WR-ITP0102RA	"AHD Internal Document - Radiated Emissions Test Method"
WR-ITP0101LC	"AHD Internal Document - Conducted Emissions Test Method"

3 Configuration and Identification of the Equipment Under Test

3.1 Description and Declarations

The EUT is a vehicle door handle mounted NFC reader. The EUT is approximately 18.5 x 2.7 x 2.5 cm in dimension, and is depicted in Figure 3.1.0 . It is powered by 13.4 VDC automotive power system. This product is mounted inside a vehicle door handle assembly and is used as an vehicular NFC interface to enable key free access. Table 3.1.0 outlines provider declared EUT specifications.

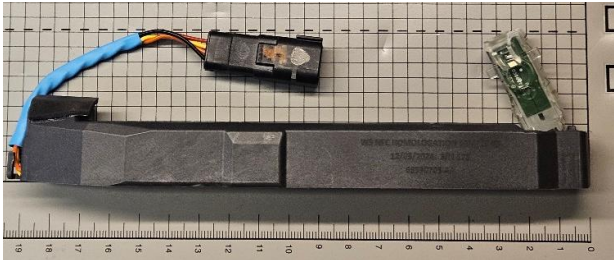


Figure 3.1.0 Photos of EUT.

Table 3.1.0 EUT Declarations.

General Declarations	
Equipment Type:	Vehicular NFC Transmitter
Country of Origin:	Not Declared
Nominal Supply:	13.4 VDC
Oper. Temp Range:	Not Declared
Frequency Range:	13.56 MHz
Antenna Dimension:	Integral
Antenna Type:	Coil
Antenna Gain:	Integral
Number of Channels:	1
Channel Spacing:	None
Alignment Range:	Not Declared
Type of Modulation:	ASK
United States	
FCC ID Number:	2A6TC-VASWSNFC
Classification:	DXX
Canada	
IC Number:	28616-VASWSNFC
Classification:	Remote Control Device

### 3.1.1 EUT Configuration

The EUT is configured for testing as depicted in Figure 3.1.1 .

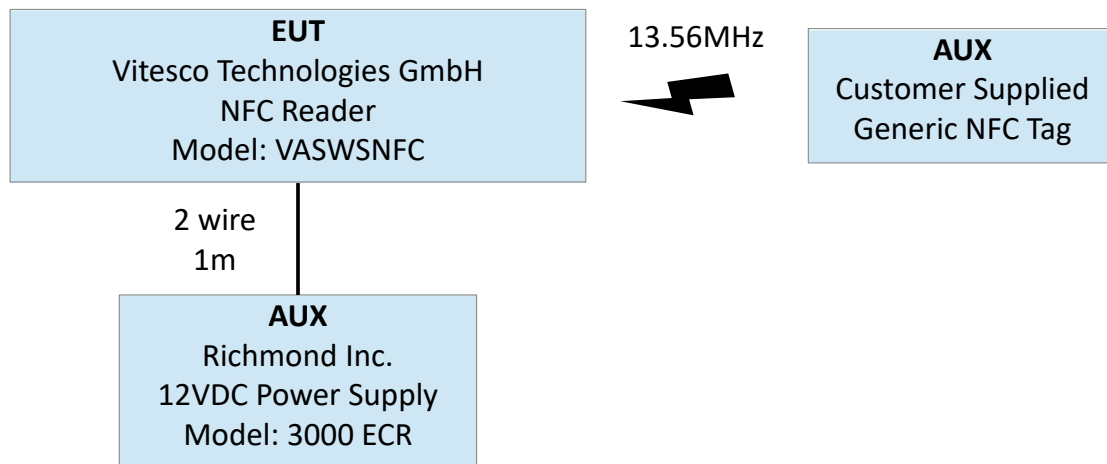


Figure 3.1.1 EUT Test Configuration Diagram.

### 3.1.2 Modes of Operation

The EUT is capable of two modes of operation, POLLING continuously to detect an NFC tag and READING interrogation of the NFC tag if detected. Both modes are tested herein.

### 3.1.3 Variants

There is only a single version of the EUT.

### 3.1.4 Test Samples

Two samples were provided for testing: One normal operating mode sample: (SN: 3429) and one modified for continuous modulation (SN: 3428), both of which are tested herein.

### 3.1.5 Functional Exerciser

Normal functionality was confirmed by measurement of transmitted signals.

### 3.1.6 Modifications Made

There were no modifications made to the EUT by this laboratory.

### 3.1.7 Production Intent

The EUT appears to be a production ready sample.

### 3.1.8 Declared Exemptions and Additional Product Notes

The EUT is permanently installed in a transportation vehicle. As such, digital emissions are exempt from US and Canadian digital emissions regulations (per FCC 15.103(a) and IC correspondence on ICES-003.)



## 4 Emissions

### 4.1 General Test Procedures

#### 4.1.1 Radiated Test Setup and Procedures

Radiated electromagnetic emissions from the EUT are first pre-scanned in our screen room. Spectrum and modulation characteristics of all emissions are recorded. Instrumentation, including spectrum analyzers and other test equipment as detailed in Section 1.8 are employed. After pre-scan, emission measurements are made on the test site of record. If the EUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in relevant test standards are followed. Alternatively, a layout closest to normal use (as declared by the provider) is employed if the resulting emissions appear to be worst-case in such a configuration. See Figure 4.1.1 . All intentionally radiating elements that are not fixed-mounted in use are placed on the test table lying flat, on their side, and on their end (3-axes) and the resulting worst case emissions are recorded. If the EUT is fixed-mounted in use, measurements are made with the device oriented in the manner consistent with installation and then emissions are recorded. If the EUT exhibits spurious emissions due to internal receiver circuitry, such emissions are measured with an appropriate carrier signal applied.

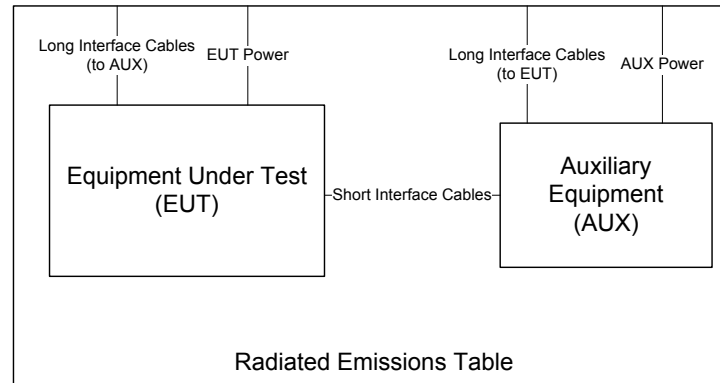


Figure 4.1.1 Radiated Emissions Diagram of the EUT.

For devices with intentional emissions below 30 MHz, a shielded loop antenna and/or E-field and H-Field broadband probes are used depending on the regulation. Shielded loops are placed at a 1 meter receive height at the desired measurement distance. For exposure in this band, 10cm diameter single-axis broadband probes meeting the requirements of ISSED RSS-102.NS.MEAS are employed. Measurements are repeated and summed over three axes, and the entire frequency range is measured with and without the EUT transmitting.

Emissions between 30 MHz and 1 GHz are measured using calibrated broadband antennas. For both horizontal and vertical polarizations, the test antenna is raised and lowered from 1 to 4 m in height until a maximum emission level is detected. The EUT is then rotated through 360° in azimuth until the highest emission is detected. The test antenna is then raised and lowered one last time from 1 to 4 m and the worst case value is recorded. Emissions above 1 GHz are characterized using standard gain or broadband ridge-horn antennas on our OATS with a 4 × 5 m rectangle of ECCOSORB absorber covering the OATS ground screen and a 1.5m table height. Care is taken to ensure that test receiver resolution and video bandwidths meet the regulatory requirements, and that the emission bandwidth of the EUT is not reduced. Photographs of the test setup employed are depicted in Figure 4.1.1 .

Where regulations allow for direct measurement of field strength, power values (dBm) measured on the test receiver / analyzer are converted to dBμV/m at the regulatory distance, using

$$E_{dist} = 107 + P_R + K_A - K_G + K_E - C_F$$

where  $P_R$  is the power recorded on spectrum analyzer, in dBm,  $K_A$  is the test antenna factor in dB/m,  $K_G$  is the combined pre-amplifier gain and cable loss in dB,  $K_E$  is duty correction factor (when applicable) in dB, and  $C_F$  is a distance conversion (employed only if limits are specified at alternate distance) in dB. This field strength value is then compared with the regulatory limit. If effective isotropic radiated power (EIRP) is computed, it is computed as

$$EIRP(dBm) = E_{3m}(dB\mu V/m) - 95.2.$$

When presenting data at each frequency, the highest measured emission under all possible EUT orientations (3-axes) is reported.

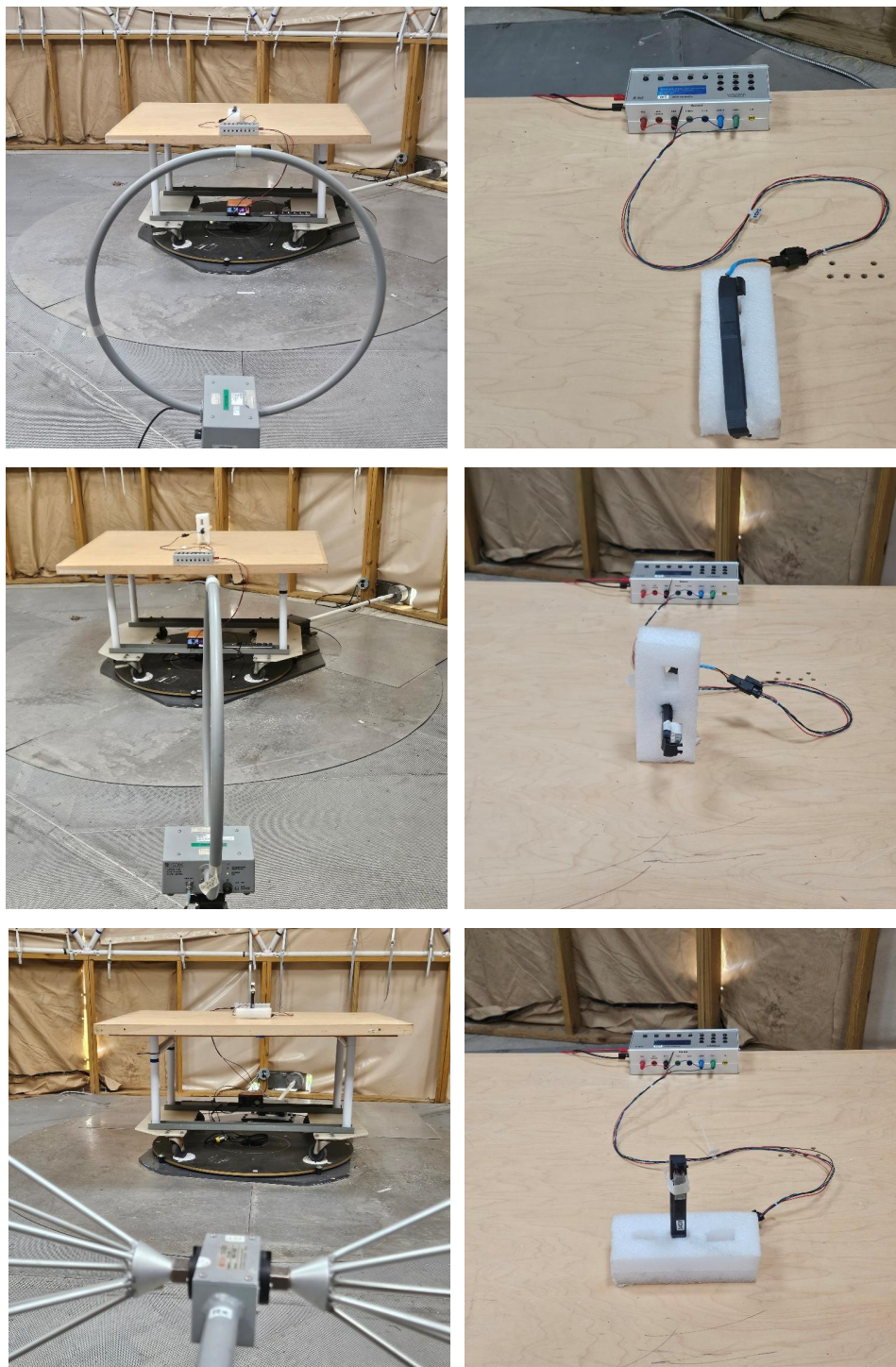


Figure 4.1.1 Radiated Emissions Test Setup Photograph(s).

#### **4.1.2 Power Supply Variation**

Tests at extreme supply voltages are made if required by the procedures specified in the test standard, and results of this testing are detailed in this report.

4.2 Intentional Emissions

4.2.1 Fundamental Emission Pulsed Operation

The details and results of testing the EUT for pulsed operation are summarized in Table 4.2.1 .

Table 4.2.1 Pulsed Emission Characteristics (Duty Cycle).

Frequency Range		Det	IF Bandwidth	Video Bandwidth	Test Date:		1-May-25	
9 kHz ≤ f ≤ 150 kHz		Pk/QPk	200 Hz	300 Hz	Test Engineer:		J. Nantz	
150 kHz ≤ f ≤ 30 MHz		Pk/QPk	9 kHz/10 kHz	30 kHz	EUT Mode:		Normal Operating	
25 MHz ≤ f ≤ 1 000 MHz		Pk/QPk	120 kHz	300 kHz	Meas. Distance:		3 meters	
f > 1 000 MHz		Pk	3 MHz	3MHz	EUT Tested:		VASWSNFC	
f > 1 000 MHz		Avg	3 MHz	10kHz				

R0	EUT Mode	Overall Transmission			Internal Frame Characteristics				Computed Duty Cycle	
		Min. Repetition Rate (sec)	Max. No. of Frames	Total Transmission Length (sec)	Max. Frame Length (ms)	Min. Frame Period (ms)	Frame Encoding	(%)	Duty (dB)	
R1	Polling	0.068	1	-	0.05	100.3	In normal operation the EUT NFC device transmits a short pulse at 13.56 MHz every 100.3 ms looking for a tag (coil loading change).	N/A	N/A	
R2	Reading	Single	28	-	23.6	29.9	When a tag is detected the EUT NFC device will transmit 28 frames at 29.9 ms to read the tag.	N/A	N/A	
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	

(ROW)

R0

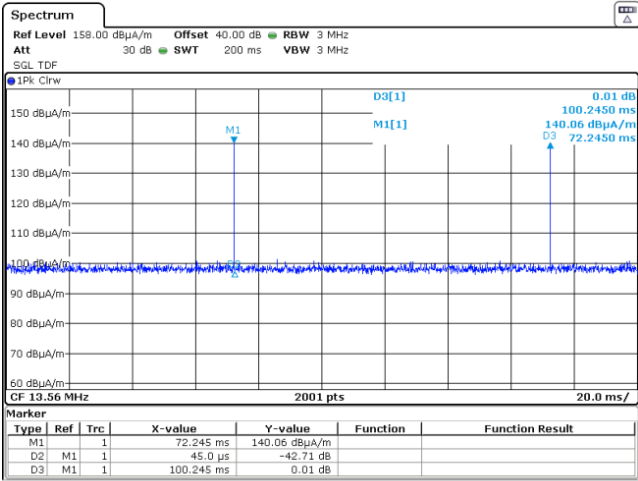
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C8/C9

NOTE:

No Duty Cycle is employed when demonstrating compliance.

POLLING



READING

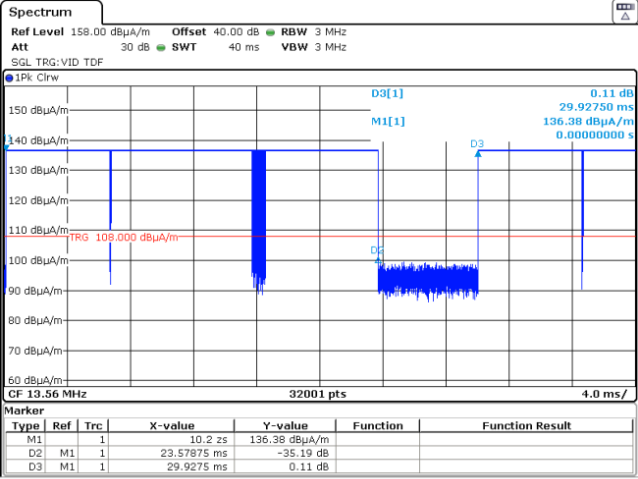
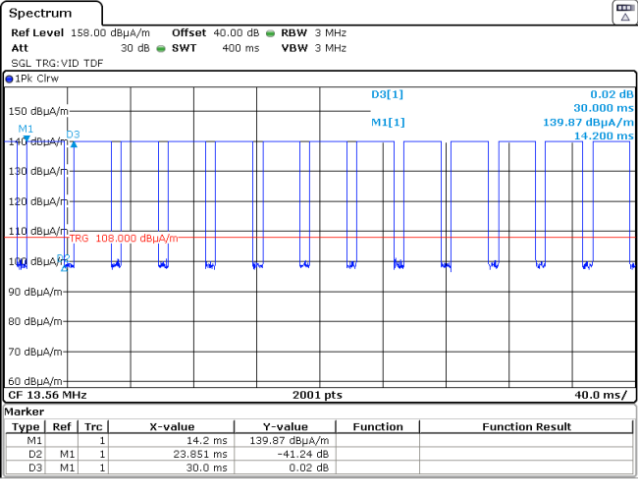
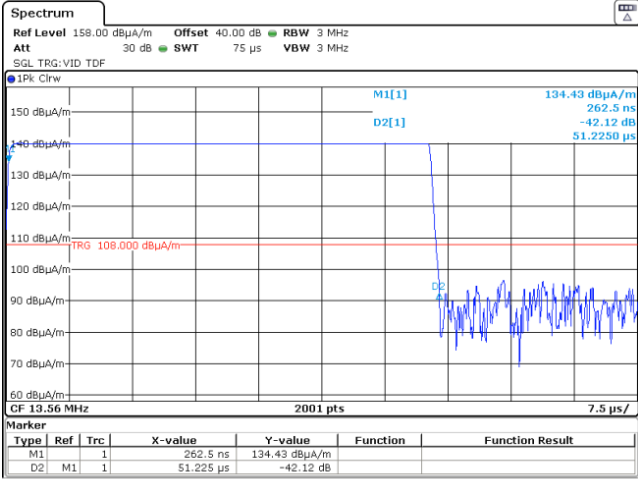
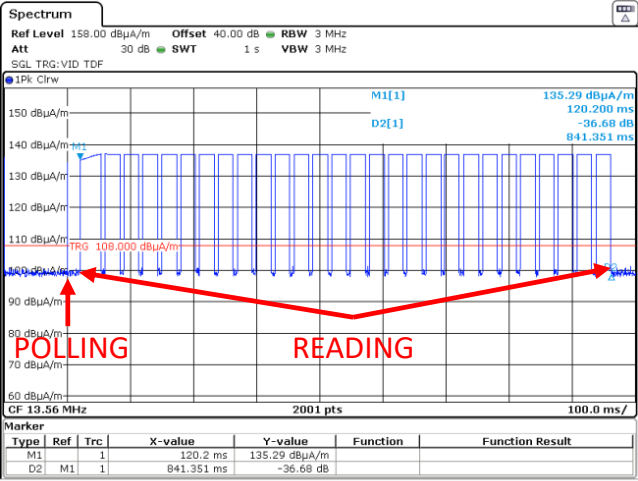


Figure 4.2.1 Example Pulsed Emission Characteristics (Duty Cycle).

#### 4.2.2 Fundamental Emission Bandwidth

Emission bandwidth (EBW) of the EUT is measured with the device placed in the test mode(s) with the shortest available frame length and minimum frame spacing. Radiated emissions are recorded following the test procedures listed in Section 2.1. The 20 dB EBW is measured as the max-held peak-detected signal when the IF bandwidth is greater than or equal to 1% of the receiver span. For complex modulations other than ASK and FSK, the 99% emission bandwidth per IC test procedures has a different result, and is also separately reported. The results of EBW testing are summarized in Table 4.2.2 . Plots showing measurements employed to obtain the emission bandwidth reported are provided in Figure 4.2.2 .

Table 4.2.2 Intentional Emission Bandwidth.

<b>Frequency Range</b>	<b>Det</b>	<b>IF Bandwidth</b>	<b>Video Bandwidth</b>	<b>Test Date:</b>	1-May-25
9 kHz $\leq f \leq$ 150 kHz	Pk	> 1% Span	$\geq 3 * \text{IFBW}$	<b>Test Engineer:</b>	J. Nantz
150 kHz $\leq f \leq$ 30 MHz	Pk	> 1% Span	$\geq 3 * \text{IFBW}$	<b>EUT Mode:</b>	See Below
				<b>Meas. Distance:</b>	0.1 meters
				<b>EUT Tested:</b>	VASWSNFC

R0	Mode	Frequency Range (MHz)	Temp (C)	Supply (V)	99% PWR BW (kHz)	20 dB EBW (kHz)	fL (20 dBc) (MHz)	fH (20 dBc) (MHz)
R1	Polling	13.56	22.7	13.5	294.35	109.45	13.506	13.615
R2	Reading	13.56	22.7	13.5	432.78	342.33	13.348	13.690
#	C1	C2	C3	C4	C5	C6	C7	C9

(ROW)

(COLUMN)

NOTE:

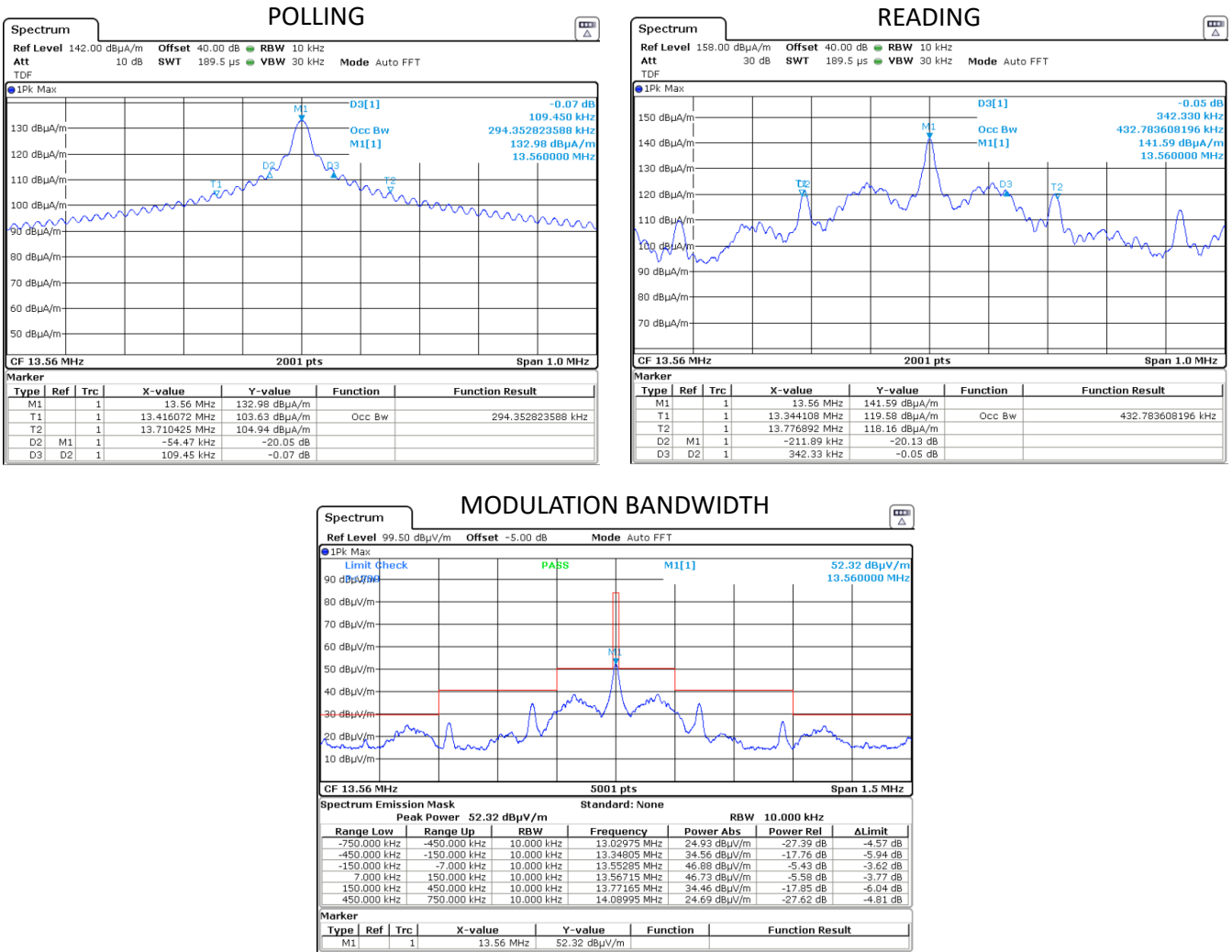


Figure 4.2.2 Example Intentional Emission Bandwidth.

4.2.3 Fundamental Emission

Following the test procedures listed in Section 2.1, field emissions measurements are made on the EUT for both Horizontal and Vertically polarized coupling fields. The EUT’s loop antenna(s) are measured along all three axes, including when the EUT loop axes are aligned in the same axis as the test loop and aligned coplanar (in the same plane) with the test loop antenna. Table 4.2.3 details the results of these measurements.

Table 4.2.3 Fundamental Radiated Emissions.

Frequency Range		Det	IF Bandwidth	Video Bandwidth		Test Date: 1-May-25									
9 kHz ≤ f ≤ 150 kHz		Pk/QPk	200 Hz	300 Hz		Test Engineer: J. Nantz									
150 kHz ≤ f ≤ 30 MHz		Pk/QPk	9 kHz	30 kHz		Meas. Distance: 3 meters									
30 MHz ≤ f ≤ 1 000 MHz		Pk/QPk	120 kHz	300 kHz		EUT Tested: VASWSNFC									
												EUT Mode: Continuous Modulation (CM)			

Fundamental Emissions Measurements																				
R0		Test Antenna	Freq.	Ant.	Ant	Table	Meas.	Pr	Ka	Kg	NF/FF	Cf	E3m (Pk)	E30m			H30m			Pass By
	EUT Description	Polarization	MHz	Used	Ht.	Angle	Dist.	dBm	dB/m	dB	boundary	3 m / 30 m	Pk	Pk	QPk/Avg	Limit	Pk	QPk/Avg	Limit	
R1	EUT (SN: 3428)	Coaxial - Horz	13.56	EMCOLOOP1	1.0	330.0	3.0		10.6	0.8	3.5	20.0	70.9	50.9		84.0	-6			33.1
R2		Coplanar - Horz	13.56	EMCOLOOP1	1.0	330.0	3.0		10.6	0.8	3.5	20.0	64.5	44.5		84.0	-7.0			39.5
R3		Coplanar - Vert	13.56	EMCOLOOP1	1.0	330.0	3.0		10.6	0.8	3.5	20.0	72.1	52.1		84.0	-6			31.9
Frequency Stability over Temperature/Voltage																				
R4	Mode	Temp (°C)	Freq. (MHz)	Voltage (VDC)	Freq. Variation (+/- ppm)			Freq. Variation Limit (+/- ppm)			Pass									
R5	CM	85	13.560048	13.5	-9			100			TRUE									
R6	CM	75	13.560036	13.5	-10			100			TRUE									
R7	CM	65	13.560021	13.5	-11			100			TRUE									
R8	CM	55	13.560009	13.5	-12			100			TRUE									
R9	CM	45	13.560056	13.5	-8			100			TRUE									
R10	CM	35	13.560117	13.5	-4			100			TRUE									
R11	CM	25	13.560117	13.5	-4			100			TRUE									
R12	CM	20	13.560165	9.0	0			100			TRUE									
R13	CM	20	13.560171	13.5	BASELINE															
R14	CM	20	13.560160	16.0	-1			100			TRUE									
R15	CM	10	13.560167	13.5	0			100			TRUE									
R16	CM	0	13.560258	13.5	6			100			TRUE									
R17	CM	-10	13.560198	13.5	2			100			TRUE									
R18	CM	-20	13.560184	13.5	1			100			TRUE									
R19	CM	-30	13.560171	13.5	0			100			TRUE									
R20	CM	-40	13.560096	13.5	-6			100			TRUE									
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13	C14	C15	C16	C17	C18	C19	C20

(ROW)

(COLUMN)

NOTE:

R0C1EUT was tested in CM mode. No averaging applied, Peak data reported to demonstrate compliance.

R0C11NF/FF Boundary at lambda/2pi distance for small radiator.

R0C1240 dB/dec near field conversion factor, 20 dB/dec far-field conversion factors are permitted. 20dB is chosen to show compliance under worst case conversion.

R0C13When E-field is reported directly from Spectrum Analyzer, Antenna Factors and Cable losses are included directly in SA settings.

R0C16E30 limit is according to RSS-210, Annex B.6.a.i

R0C17H-field is computed by subtracting dBQ in freespace from E-Field measurements = 20\*log(120π) = 51.5dB

R4C9-C12Carrier stability limit is according to RSS-210, Annex B.6.b



### 4.3 Unintentional Emissions

#### 4.3.1 Transmit Chain Spurious Emissions

The results for the measurement of transmit chain spurious emissions at the nominal voltage and temperature are provided in Table 4.3.1 . Following the test procedures listed in Section 2.1, field emissions measurements are made on the EUT for both Horizontal and Vertically polarized coupling fields. The EUT's loop antenna(s) are measured when the EUT loop axes placed in all three axes, including when they are aligned along the same axis as the test loop antenna and are aligned coplanar with the test loop antenna. For all arrangements, test loop is rotated for maximum field. The results for the measurement of transmit chain spurious emissions at the nominal voltage and temperature are provided in Table 4.3.1 . Measurements are performed to 10 times the highest fundamental operating frequency.

Table 4.3.1 Transmit Chain Spurious Emissions.

<b>Frequency Range</b>	<b>Det</b>	<b>IF Bandwidth</b>	<b>Video Bandwidth</b>	<b>Test Date:</b>	1-May-25
9 kHz ≤ f ≤ 150 kHz	Pk/QPk	200 Hz	300 Hz	<b>Test Engineer:</b>	J. Nantz
150 kHz ≤ f ≤ 30 MHz	Pk/QPk	9 kHz	30 kHz	<b>Meas. Distance:</b>	3 meters
25 MHz ≤ f ≤ 1 000 MHz	Pk/QPk	120 kHz	300 kHz	<b>EUT Tested:</b>	VASWSNFC
				<b>EUT Mode:</b>	Continuous Modulation (CM)

Transmit Chain Spurious Emissions																					
#	Mode	Test Antenna Polarization	Freq. Start MHz	Freq. Stop MHz	Ant. Used	Ant Ht. m	Table Angle deg	Meas. Dist. m	Ka dB/m	Kg dB	NF/FF boundary m	Cf (3 to 30m) dB	E3m (Pk) Pk dBuV/m	E-field (Pk) (Qpk/Avg) dBuV/m	E-field Limit (30m / 3m) dBuV/m	H-field (Pk) (Qpk/Avg) dBuA/m	ISED H-field Limit (30m / 3m) dBuA/m	Pass By	Comments		
R1	CM (SN: 3428)	Coaxial - Horiz	27.1	27.1	EMCOLOOP1	1.0	330.0	3.0	8.7	1.0	1.8	20.0	26.3	6.3	49.5	-45.2	-21.9	23.3	Max all		
R2		H/V (worst case)	40.7	40.7	BICEMCO01	1.0	max all	3.0	11.5	-4		.0	30.7	30.7	40.0			9.3	background		
R3		H/V (worst case)	54.2	54.2	BICEMCO01	1.0	max all	3.0	10.1	-4		.0	22.3	22.3	40.0			17.7	background		
R4		H/V (worst case)	67.8	67.8	BICEMCO01	1.0	max all	3.0	9.7	-4		.0	23.9	23.9	40.0			16.1	background		
R5		H/V (worst case)	81.4	81.4	BICEMCO01	1.0	max all	3.0	9.5	-5		.0	19.9	19.9	40.0			20.1	background		
R6		H/V (worst case)	94.9	94.9	BICEMCO01	1.0	max all	3.0	9.7	-5		.0	32.3	32.3	43.5			11.2	background		
R7		H/V (worst case)	108.5	108.5	BICEMCO01	1.0	max all	3.0	10.6	-6		.0	14.5	14.5	43.5			29.0	background		
R8		H/V (worst case)	122.0	122.0	BICEMCO01	1.0	max all	3.0	11.7	-6		.0	14.0	14.0	43.5			29.5	background		
R9		H/V (worst case)	135.6	135.6	BICEMCO01	1.0	max all	3.0	12.3	-6		.0	13.6	13.6	43.5			29.9	background		
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13	C14	C15	C16	C17	C18	C19	C20	C21
(ROW)	(COLUMN)																				
R0	NOTE:																				
R0	C1 EUT was tested in CW mode. No averaging applied, Peak data reported to demonstrate compliance.																				
R0	C11 NF/FF Boundary at lambda/2pi distance for small radiator.																				
R1	C12 40 dB/dec near field conversion factor, 20 dB/dec far-field conversion factors are permitted. 20dB is chosen to show compliance under worst case conversion.																				
R0	C13 When E-field is reported directly from Spectrum Analyzer, Antenna Factors and Cable losses are included directly in SA settings.																				
R0	C17 H-field is computed by subtracting dBΩ in freespace from E-Field measurements = 20*log(120π) = 51.5dB																				

5 Measurement Uncertainty and Accreditation Documents

The maximum values of measurement uncertainty for the laboratory test equipment and facilities associated with each test are given in the table below. This uncertainty is computed for a 95.45% confidence level based on a coverage factor of  $k = 2$ .

Table 5.0.0 Measurement Uncertainty.

Measured Parameter	Measurement Uncertainty <sup>†</sup>
Radio Frequency	$\pm(f_{Mkr}/10^7 + RBW/10 + (SPN/(PTS - 1))/2 + 1 \text{ Hz})$
Conducted Emm. Amplitude	±1.9 dB
Radiated Emm. Amplitude ( $f < 30 \text{ MHz}$ )	±3.1 dB
Radiated Emm. Amplitude (30 – 200 MHz)	±4.0 dB
Radiated Emm. Amplitude (200 – 1000 MHz)	±5.2 dB
Radiated Emm. Amplitude ( $f > 1000 \text{ MHz}$ )	±3.7 dB

<sup>†</sup>Ref: CISPR 16-4-2:2011+A1:2014



Figure 5.0.0 Accreditation Documents