MET Laboratories, Inc. ***Safety Certification - EMI - Telecom Environmental Simulation***
914 WEST PATAPSCO AVENUE ! BALTIMORE, MARYLAND 21230-3432 ! PHONE (410) 354-3300 ! FAX (410) 354-3313
33439 WESTERN AVENUE ! UNION CITY, CALIFORNIA 94587 ! PHONE (510) 489-6300 ! FAX (510) 489-6372
3162 BELICK STREET ! SANTA CLARA, CA 95054 ! PHONE (408) 748-3585 ! FAX (510) 489-6372
13301 MCCALLEN PASS ! AUSTIN, TX 78753 ! PHONE (512) 287-2500 ! FAX (512) 287-2513

January 23, 2018

Paragon Robotics
5386 Majestic Pkwy #2
Bedford Hts, OH 44146

Dear Jeff Schreiber,

Enclosed is the EMC Wireless test report for compliance testing of the Paragon Robotics, OE31 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 MET Laboratories, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
MET LABORATORIES, INC.

Joel Huna
Documentation Department

Reference: (\Paragon Robotics\EMC92753B-FCC247 Rev. 3)

ACCREDITED
TESTING CERT #0591.01

Electromagnetic Compatibility Criteria
Test Report

for the

Paragon Robotics
OE31

Tested under
the FCC Certification Rules contained in
Title 47 of the CFR, Part 15.247 Subpart C
for Intentional Radiators

MET Report: EMC92753B-FCC247 Rev. 3

January 23, 2018

Prepared For:

Paragon Robotics
5386 Majestic Pkwy #2
Bedford Hts, OH 44146

Prepared By:
MET Laboratories, Inc.
914 West Patapsco Avenue,
Baltimore, MD 21230

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for Intentional Radiators

Deepak Giri, 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.

John Mason,
Director, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
∅	August 29, 2017	Initial Issue.
1	November 20, 2017	Engineer corrections.
2	January 17, 2018	TCB Corrections.
3	January 23, 2018	Editorial corrections.

Table of Contents

List of Tables

List of Plots

List of Figures

List of Photographs

List of Terms and Abbreviations

AC	**A**lternating **C**urrent
ACF	**A**ntenna **C**orrection **F**actor
Cal	**Cal**ibration
d	**M**easurement **D**istance
dB	**D**eci**b**els
dBµA	**D**eci**b**els above one **micro**amp
dBµV	**D**eci**b**els above one **micro**volt
dBµA/m	**D**eci**b**els above one **micro**amp **per m**eter
dBµV/m	**D**eci**b**els above one **micro**volt **per m**eter
DC	**D**irect **C**urrent
E	**E**lectric Field
DSL	**D**igital **S**ubscriber **L**ine
ESD	**E**lectro**s**tatic **D**ischarge
EUT	**E**quipment **U**nder **T**est
f	**F**requency
FCC	**F**ederal **C**ommunications **C**ommission
GRP	**G**round **R**eference **P**lane
H	Magnetic Field
HCP	**H**orizontal **C**oupling **P**lane
Hz	**H**ert**z**
IEC	**I**nternational **E**lectrotechnical **C**ommission
kHz	**k**ilo**h**ert**z**
kPa	**k**ilo**pa**scal
kV	**k**ilo**v**olt
LISN	**L**ine **I**mpedance **S**tabilization **N**etwork
MHz	**M**ega**h**ertz
µH	**microh**enry
µ	**microf**arad
µs	**micros**econds
NEBS	**N**etwork **E**quipment-**B**uilding **S**ystem
PRF	**P**ulse **R**epetition **F**requency
RF	**R**adio **F**requency
RMS	**R**oot-**M**ean-**S**quare
TWT	**T**raveling **W**ave **T**ube
V/m	**V**olts **per m**eter
VCP	**V**ertical **C**oupling **P**lane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Paragon Robotics OE31, 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 OE31. Paragon Robotics should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the OE31, 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 Paragon Robotics, purchase order number 1485312064495. All tests were conducted using measurement procedure ANSI C63.10-2013.

FCC Reference 47 CFR Part 15.247:2005	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)(1)	20 dB Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	Average Time of Occupancy (Dwell Time)	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	Number of RF Channels	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	RF Channel Separation	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); §15.209; §15.205	Radiated Spurious Emissions	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	Spurious Conducted Emissions	Compliant
Title 47 of the CFR, Part 15 §15.247(g) & (h)	Declaration Statements for FHSS	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 ComplianceTesting

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by Paragon Robotics to perform testing on the OE31, under Paragon Robotics's purchase order number 1485312064495.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Paragon Robotics, OE31.

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

Model(s) Tested:	OE31	
Model(s) Covered:	OE31	
EUT Specifications:	Primary Power: 1.8 to 3.6 VDC	
	FCC ID: 2AAA2-OE3W	
	Type of Modulations:	GFSK
	Equipment Code:	DSS
	Peak RF Output Power:	20.90 dBm
	EUT Frequency Ranges:	903.8 to 926.37 MHz
	Antenna:	Whip Antenna (1 dBi)
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature: 15-35º C	
	Relative Humidity: 30-60%	
	Barometric Pressure: 860-1060 mbar	
Evaluated by:	Deepak Giri	
Report Date(s):	January 23, 2018	

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 17025:2005	General Requirements for the Competence of Testing and Calibration Laboratories
ANSI C63.10-2013	American National Standard for Testing Unlicensed Wireless Devices
KDB 447498 D01	General RF Exposure Guidance v05r01

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 914 West Patapsco Avenue, Baltimore, MD 21230. 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 3 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.

MET Laboratories is a ISO/IEC 17025 accredited site by A2LA. Baltimore #0591.01.

D. Description of Test Sample

The Paragon Robotics OE31, Equipment Under Test (EUT), is a wireless transceiver module designed to allow peer-to-peer communications between equipped devices on a wireless network. The OE3x is intended to be installed as a component module or daughter board on a parent device, typically a PCB. The module is programmed with Paragon Robotics' Halo/S cloud, which provides mechanisms for wireless connectivity, as well as various electronic input/output capabilities and end-user customization.

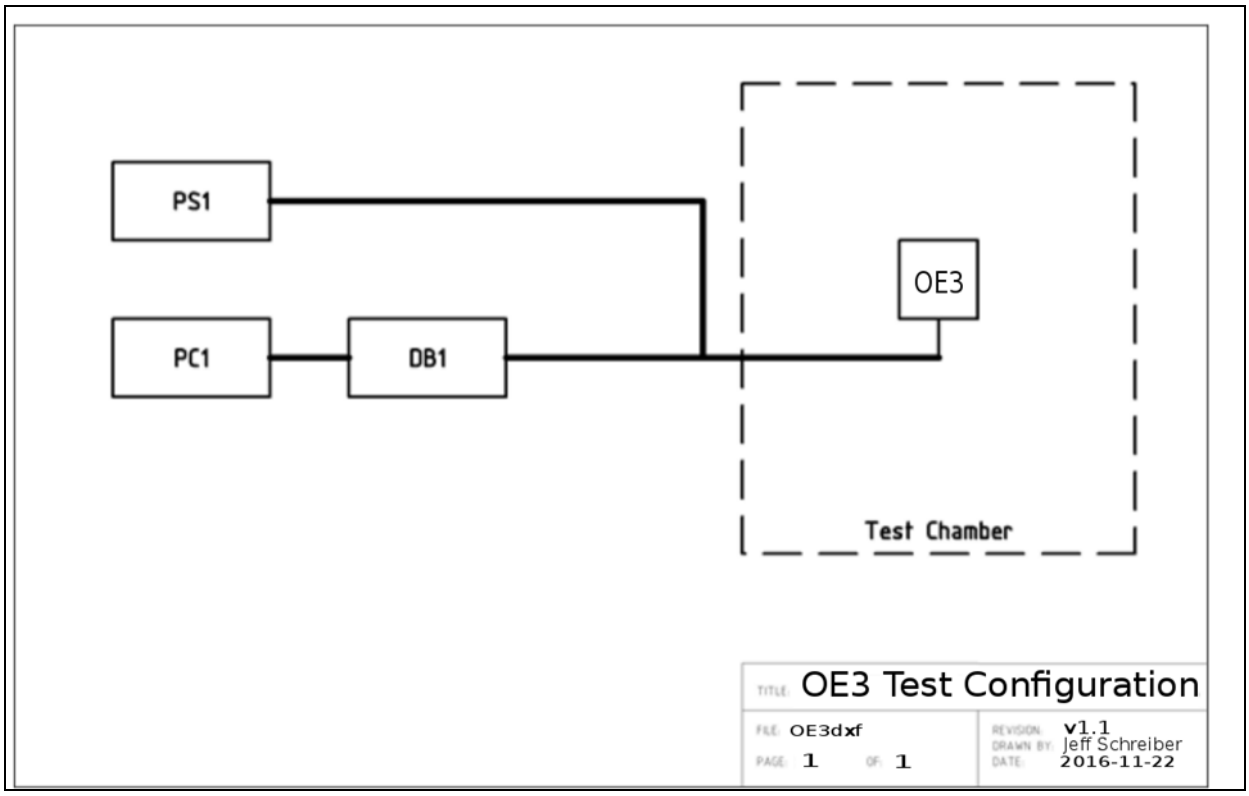


Figure 1. Block Diagram of Test Configuration

E. 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. #
OE3x		OE3x Wireless Module	OE3x		N/A	

Table 4. Equipment Configuration

F. 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
PS1	DC Power Supply	BK Precision		
DB1	USB Debug Adapter	Silicon Labs	DEBUGADPTR-1USB	
PC1	Laptop	Dell		
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 5. Support Equipment

G. 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
CAB1	Debug/Power	Provides debug connections and power to EUT	1	25ft		Yes	
CAB2	USB	Connects PC to debugger	1	6ft		Yes	DB1-USB-B

Table 6. Ports and Cabling Information

H. Mode of Operation

The OE3x is generally installed on a parent device, typically a PCB. There are 73 castellated pads on the OE3x perimeter that allow for it to be surface mounted to a parent device. Normal operation is controlled by the installed firmware. Test tone at a low, middle, and high frequency. Frequency hopping with a sample packet for each of the 25 channels.

I. Method of Monitoring EUT Operation

Fail if overall current draw > 200mA. Monitor by power supply current reading.

J. 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.

K. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Paragon Robotics 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 as tested is compliant the criteria of §15.203. Antenna is permanently attached using epoxy.

Test Engineer(s): Deepak Giri

Test Date(s): March 13, 2017

Gain	Type	Model	Manufacturer
1	Omni - Rod	ANTA2000A0200BR11	Siretta

Table 7. 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 μH/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 (dBμV)	
	Quasi-Peak	Average
* 0.15- 0.45	66 - 56	56 - 46
0.45 - 0.5	56	46
0.5 - 30	60	50

Table 8. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Procedure: The EUT was placed on a 0.8 m-high wooden table inside a screen room. 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 μH 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 C63.4-2014 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz"*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50 Ω/50 μH LISN as the input transducer to an EMC/field intensity meter. For the purpose of this testing, the transmitter was turned on. Scans were performed with the transmitter on.

Test Results: The EUT was compliant with this requirement.

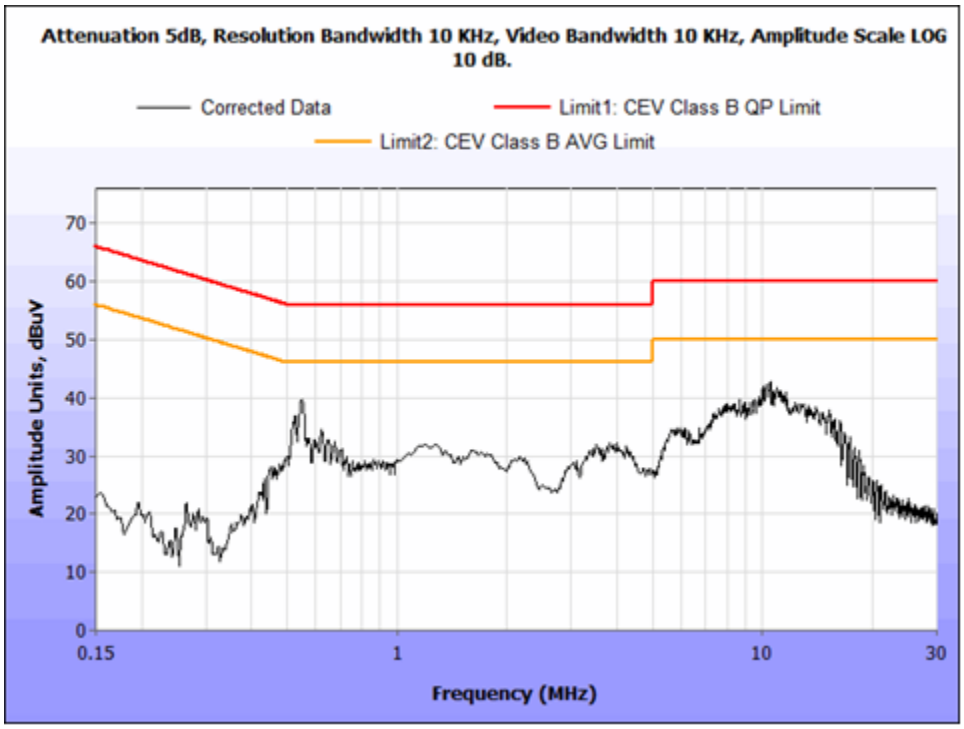
Test Engineer: Deepak Giri

Test Date: December 20, 2017

FCC §15.207(a) Conducted Emissions Test Results

Frequency (MHz)	Uncorrected Meter Reading (dBµV) QP	Cable Loss (dB)	Corrected Measurement (dBµV) QP	Limit (dBµV) QP	Margin (dB) QP	Uncorrected Meter Reading (dBµV) Avg.	Cable Loss (dB)	Corrected Measurement (dBµV) AVG	Limit (dBµV) AVG	Margin (dB) AVG
0.549	36.15	0	36.15	56	-19.85	30.84	0	30.84	46	-15.16
3.985	29.5	0	29.5	56	-26.5	20.2	0	20.2	46	-25.8
10.51	36.41	0	36.41	60	-23.59	25.67	0	25.67	50	-24.33
9.997	36.76	0	37.34	60	-22.66	24.96	0	24.96	50	-25.04
15.65	30.88	0	31.22	60	-28.78	18.29	0	18.29	50	-31.71
18.84	22.02	0	23.14	60	-36.86	14.21	0	14.21	50	-35.79

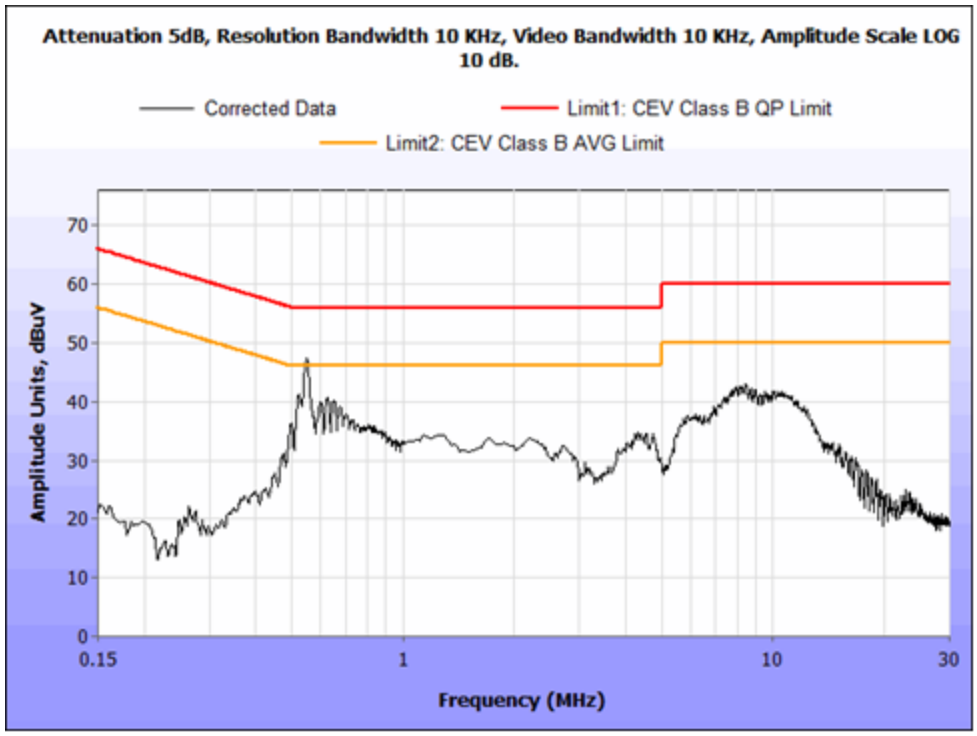
Table 9. Conducted Emissions, Neutral Line, Test Results



Plot 1. Conducted Emissions, Neutral Line

Frequency (MHz)	Uncorrected Meter Reading (dBµV) QP	Cable Loss (dB)	Corrected Measurement (dBµV) QP	Limit (dBµV) QP	Margin (dB) QP	Uncorrected Meter Reading (dBµV) Avg.	Cable Loss (dB)	Corrected Measurement (dBµV) AVG	Limit (dBµV) AVG	Margin (dB) AVG
0.547	45.01	0	45.01	56	-10.99	38.74	0	38.74	46	-7.26
4.239	29.73	0	29.73	56	-26.27	21.89	0	21.89	46	-24.11
7.982	40.56	0	40.56	60	-19.44	31.45	0	31.45	50	-18.55
10.45	37.84	0	37.84	60	-22.16	29.57	0	29.57	50	-20.43
14.56	27.78	0	27.78	60	-32.22	18.67	0	18.67	50	-31.33
20.14	20.19	0	20.19	60	-39.81	14.71	0	14.71	50	-35.29

Table 10. Conducted Emissions, Phase Line, Test Results



Plot 2. Conducted Emissions, Phase Line

Photograph 1. Conducted Emissions, Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) 20 dB Occupied Bandwidth

Test Requirements: **§ 15.247(a):** 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. For DTS, the minimum 6 dB bandwidth shall be at least 500 kHz. For frequency hopping systems, the EUT shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

Test Procedure: The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately equal to 1% of the total emission bandwidth. The 20 dB bandwidth was measured and recorded.

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

Test Engineer(s): Deepak Giri

Test Date(s): March 21, 2017

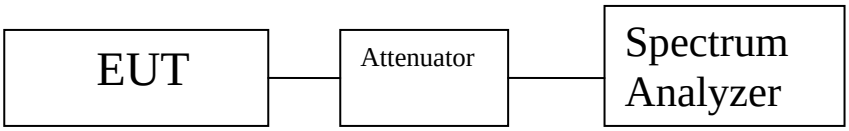
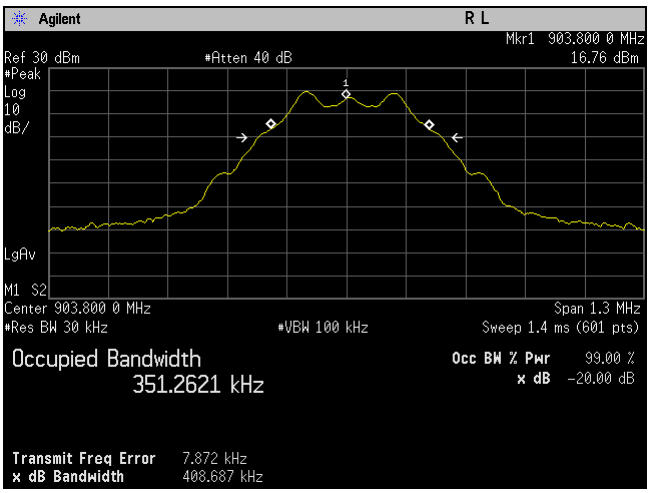
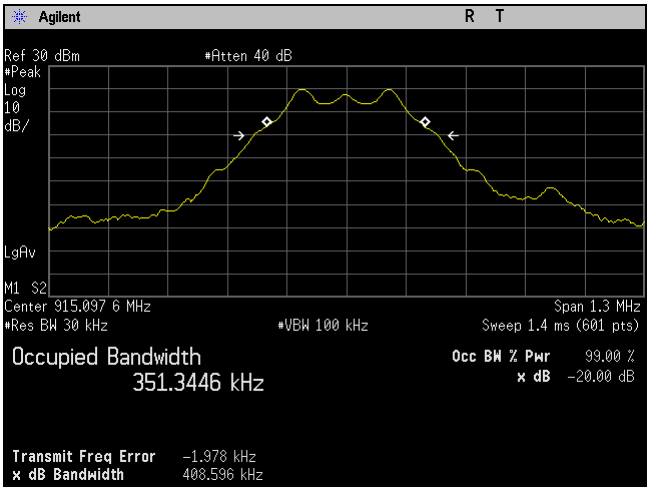


Figure 2. Block Diagram, Occupied Bandwidth Test Setup

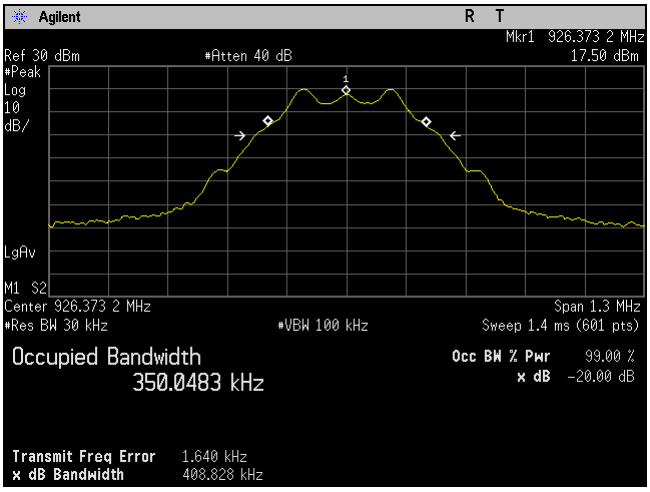
20 dB Occupied Bandwidth Test Results



Plot 3. 20 dB Occupied Bandwidth, Low Channel



Plot 4. 20 dB Occupied Bandwidth, Mid Channel



Plot 5. 20 dB Occupied Bandwidth, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) Average Time of Occupancy (Dwell Time)

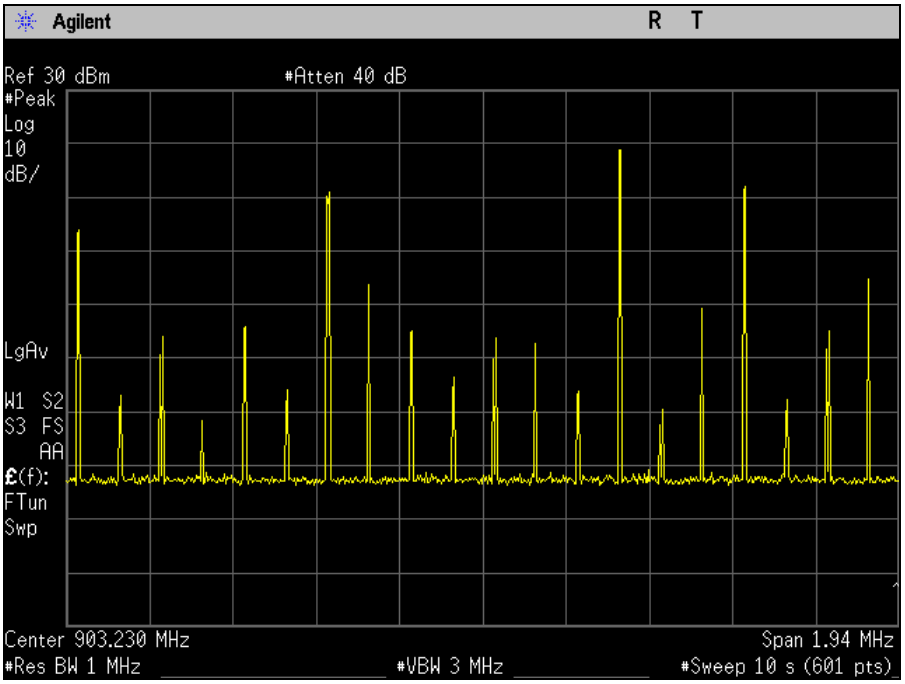
Requirement The average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period.

Remarks: Total hopping channels is 25. The EUT meets the specifications of Section 15.247(a) (1) (iii) for Number of Hopping Channels.

Dwell Time							
Frequency Range	**No. of Channels**	**Hopping Period (s)**	**No. of Burst per Period**	**Burst duration (s)**	**Dwell Time (s)**	**Limit (s)**	**Margin**
903.8-926.37 MHz	25	10	20	0.3206	0.3206	0.4	-0.0794

Table 11. Average Time of Occupancy

Dwell Time



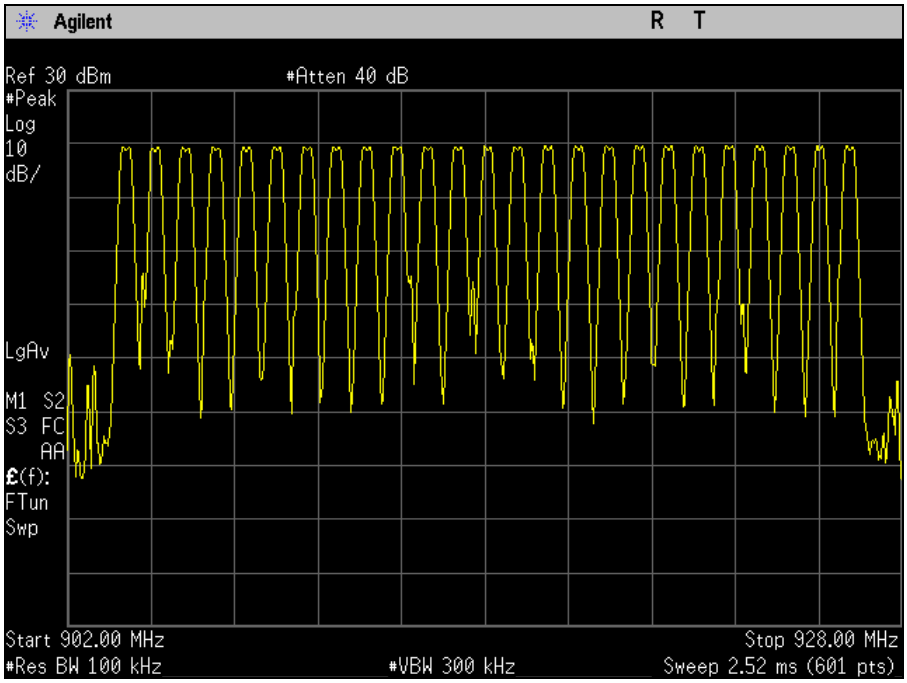
Plot 6. Dwell Time, 10s

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) Number of RF Channels

Requirements: If the 20 dB bandwidth of the hopping channel is 250 kHz or greater, the system shall use at least 25 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period. The maximum allowed 20 dB bandwidth of the hopping channel is 500 kHz.

Remarks: EUT has 25 hopping channels.



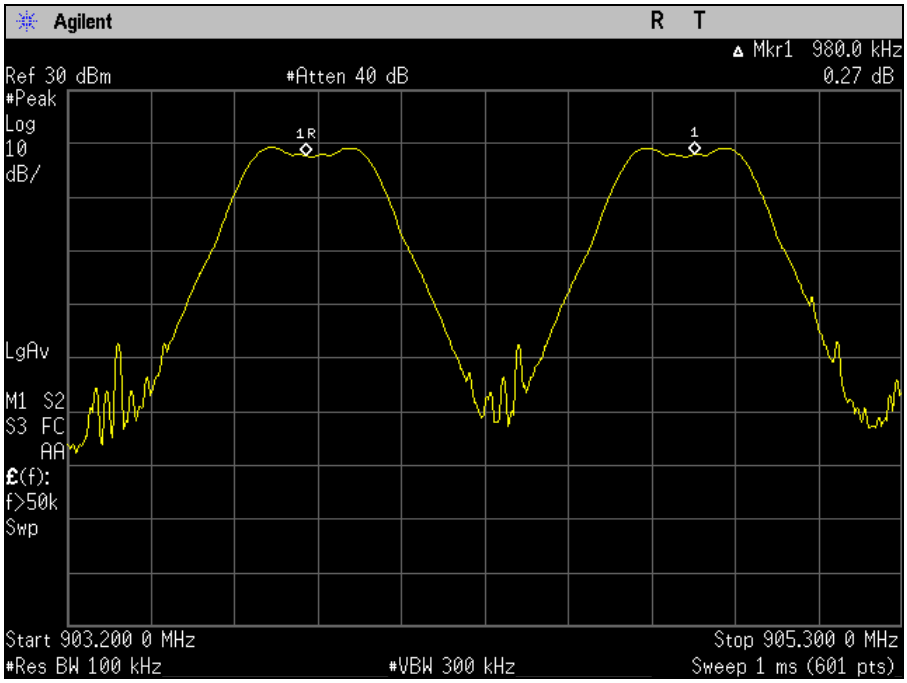
Plot 7. Number of Channels

Electromagnetic Compatibility Criteria for Intentional Radiators

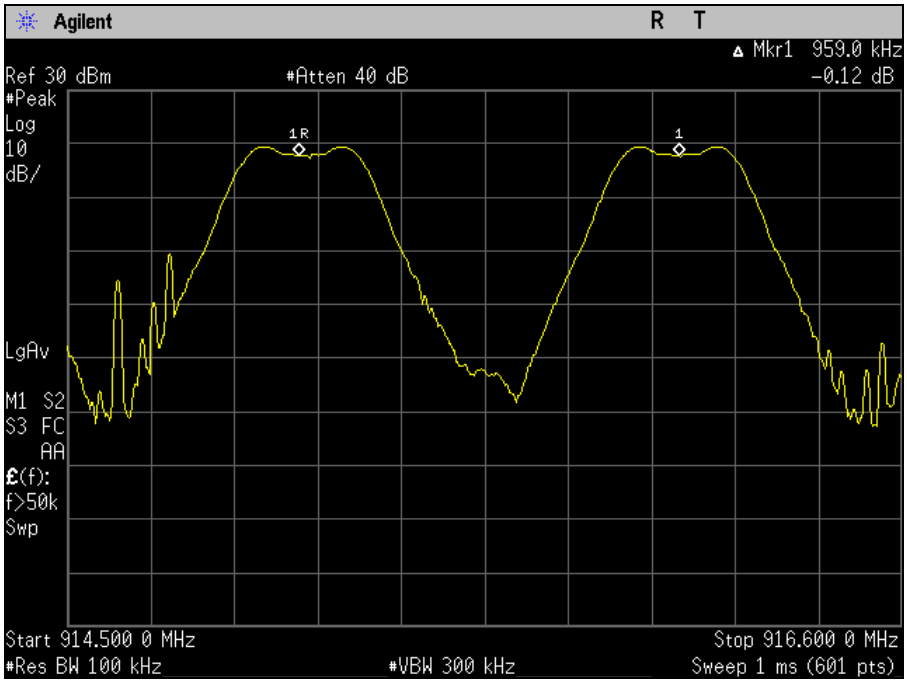
§ 15.247(a)(1) RF Channel Separation

Requirement: Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400–2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW.

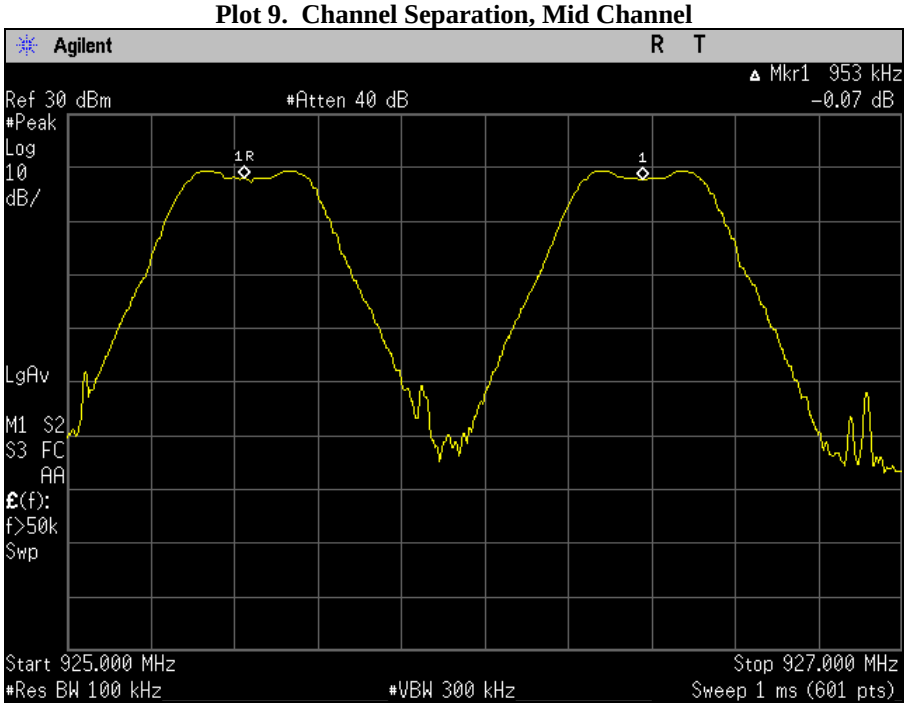
Remarks: Channels are separated by more than -20dB Bandwidth.



Plot 8. Channel Separation, First and Second



Plot 9. Channel Separation, Mid Channel



Plot 10. Channel Separation, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output

Test Requirements: **§15.247(b)(1):** The maximum peak output power of the intentional radiator shall not exceed the following: For frequency hopping systems operating in the 902-928 MHz band: 1 watt for systems employing at least 50 hopping channels; and, 0.25 watts for systems employing less than 50 hopping channels, but at least 25 hopping channels, as permitted under paragraph (a)(1)(i) of this section.

Test Procedure: The transmitter was connected to a calibrated spectrum analyzer. The EUT was measured at the low, mid and high channels of each band. Power integration fuction was used in the spectrum analyzer to perform the measurement with 100KHz RBW and peak detector. This measurement was compared with the measurement guidance for FHSS output power in ANSI C63.10 2013 (7.8.5), and results were comparable.

Test Results: The EUT was compliant with the Peak Power Output limits of **§15.247(b)**.

Test Engineer(s): Deepak Giri

Test Date(s): March 13, 2017

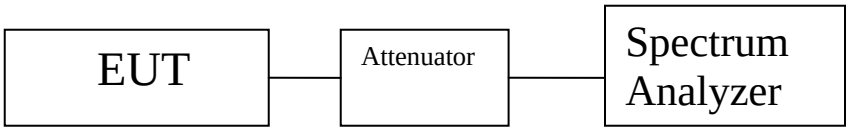


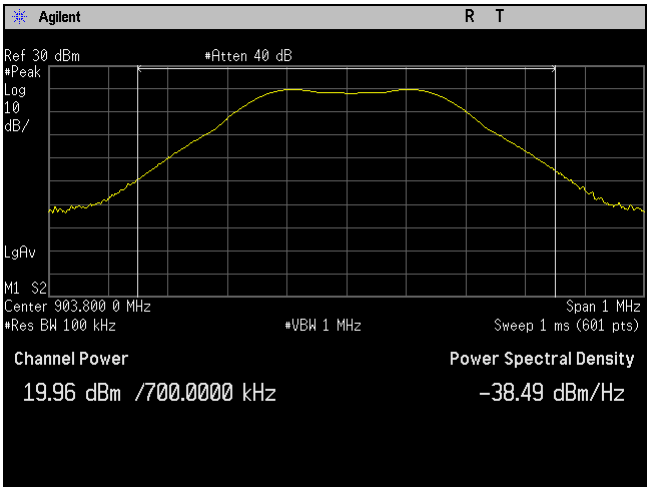
Figure 3. Peak Power Output Test Setup

Peak Power Output Test Results

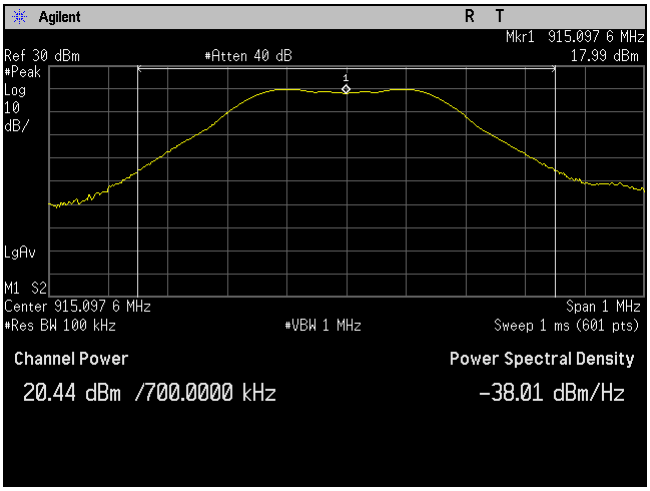
Frequency MHz	Conducted Power dBm	Antenna Gain dBi	EIRP dBm	Conducted Limit dBm	Margin
903.8 Mhz	19.96	1	20.96	24	-2.24
915.08 Mhz	20.44	1	21.44	24	-1.76
926.37 Mhz	20.90	1	21.90	24	-1.3

Table 12. Peak Power Output, Test Results

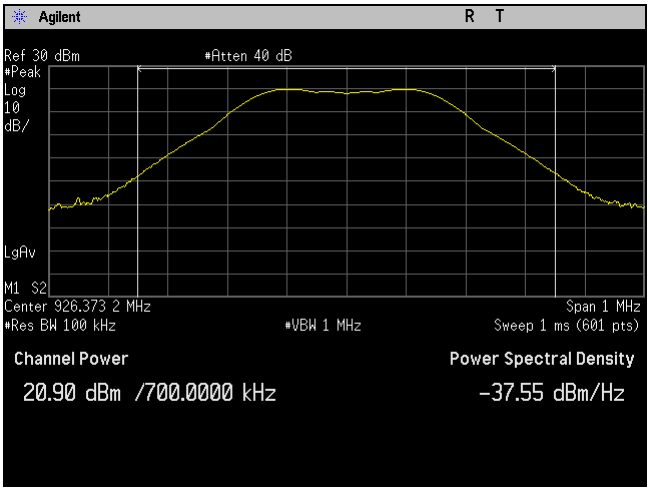
Peak Power Output Test Results



Plot 11. Peak Power Output, Low Channel



Plot 12. Peak Power Output, Mid Channel



Plot 13. Peak Power Output, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

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

§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. Attenuation below the general limits specified in § 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in § 15.205(a), must also comply with the radiated emission limits specified in § 15.209(a).

§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])

Table 13. 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 14.

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

Test Procedure: The transmitter was set to a mid channel at the highest output power and placed on a 0.8 m high wooden table inside in a semi-anechoic chamber. Measurements were performed with the EUT rotated 360 degrees and varying the adjustable antenna mast with 1 m to 4 m height to determine worst case orientation for maximum emissions. Measurements were repeated the at the lowest and highest channels.

For frequencies from 30 MHz to 1 GHz, measurements were made using a peak detector. . Any peak close to limit line by 20 dB were investigated with quasi-peak detector.

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.

In accordance with §15.35(b) the limit on the radio frequency emissions as measured using instrumentation with a peak detector function shall be 20 dB above the maximum permitted average limit for the frequency being investigated unless a different peak emission limit is otherwise specified in the rules.

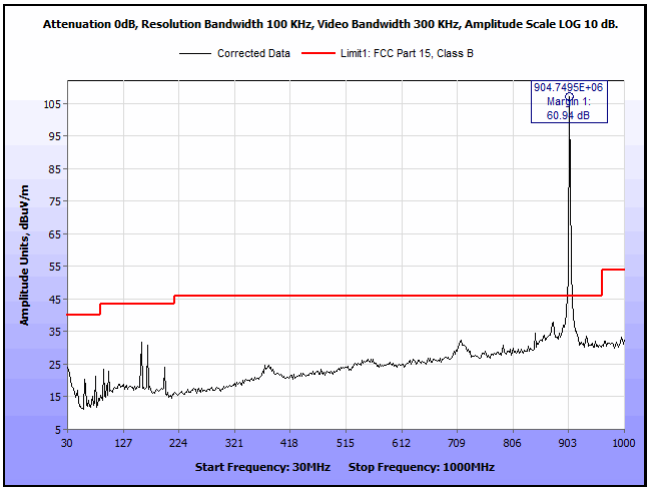
EUT Field Strength Final Amplitude = Raw Amplitude – Preamp gain + Antenna Factor + Cable Loss – Distance Correction Factor.

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

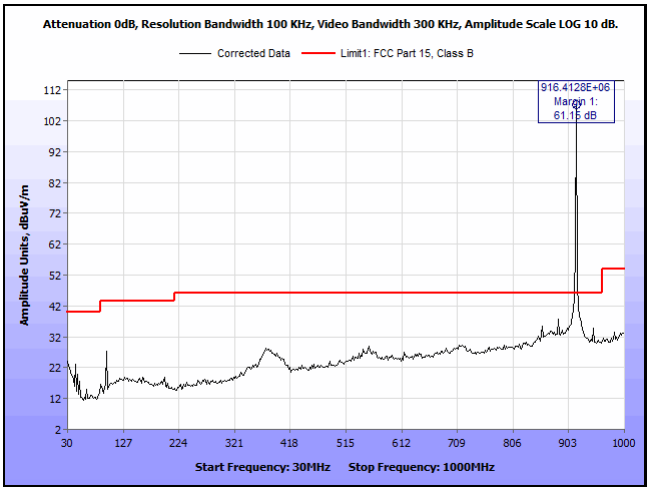
Test Engineer(s): Deepak Giri

Test Date(s): March 24, 2017

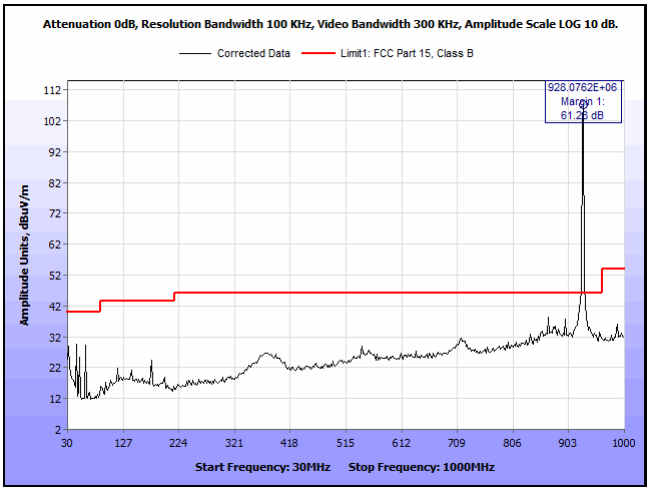
Radiated Spurious Emissions Test Results



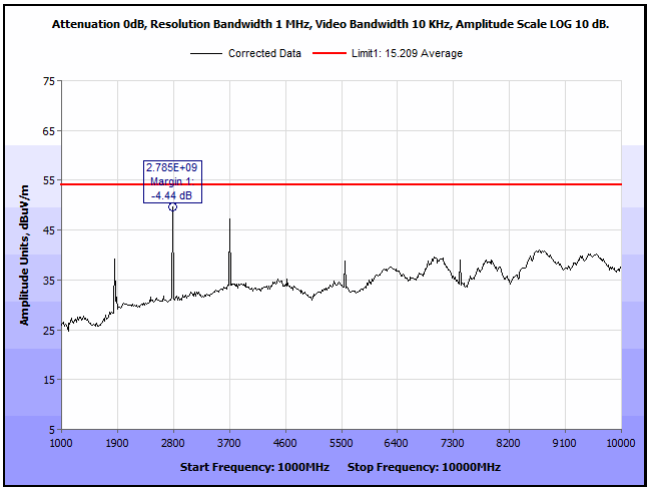
Plot 14. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz



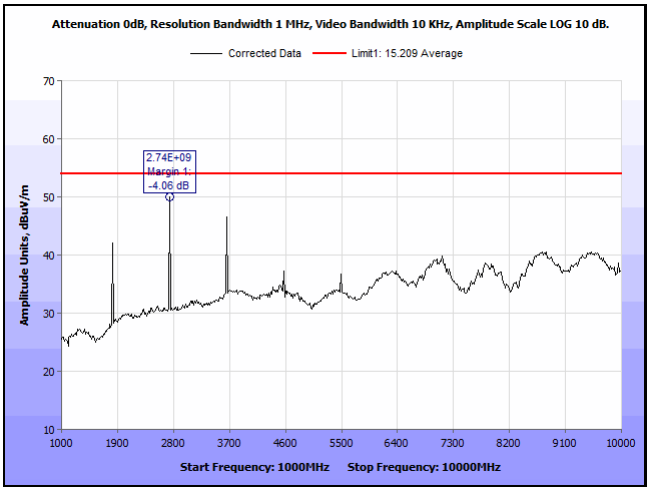
Plot 15. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz



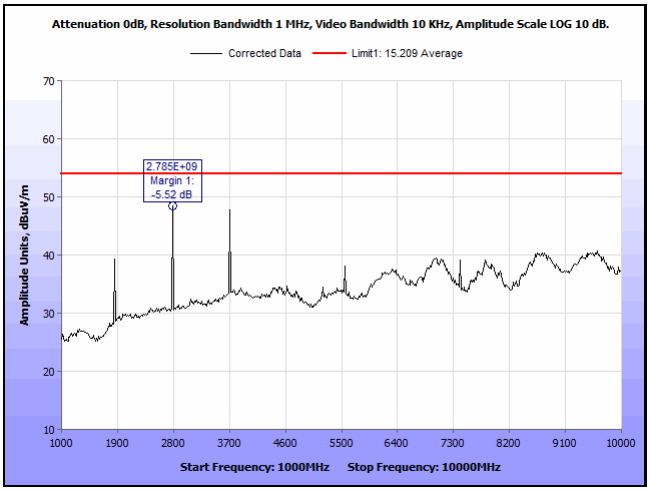
Plot 16. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz



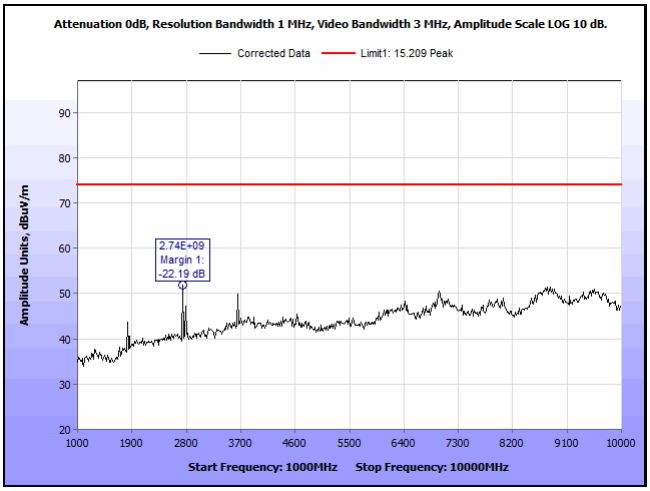
Plot 17. Radiated Spurious Emissions, Low Channel, 1 GHz – 10 GHz, Average



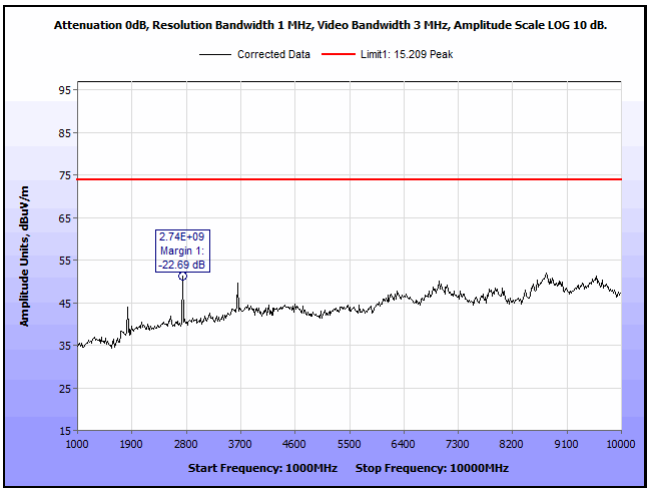
Plot 18. Radiated Spurious Emissions, Mid Channel, 1 GHz – 10 GHz, Average



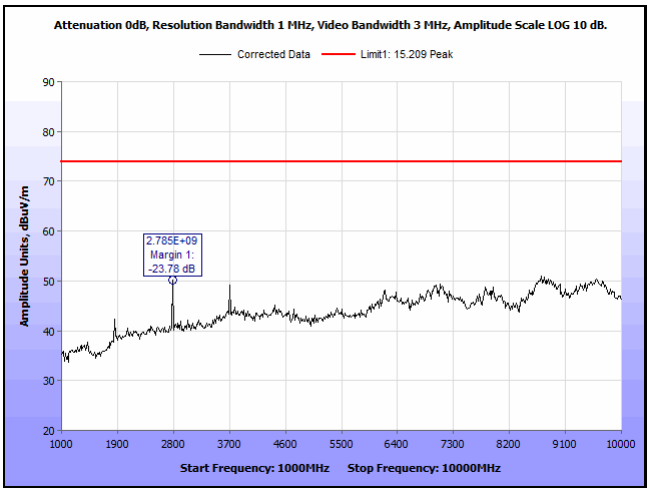
Plot 19. Radiated Spurious Emissions, High Channel, 1 GHz – 10 GHz, Average



Plot 20. Radiated Spurious Emissions, Low Channel, 1 GHz – 10 GHz, Peak

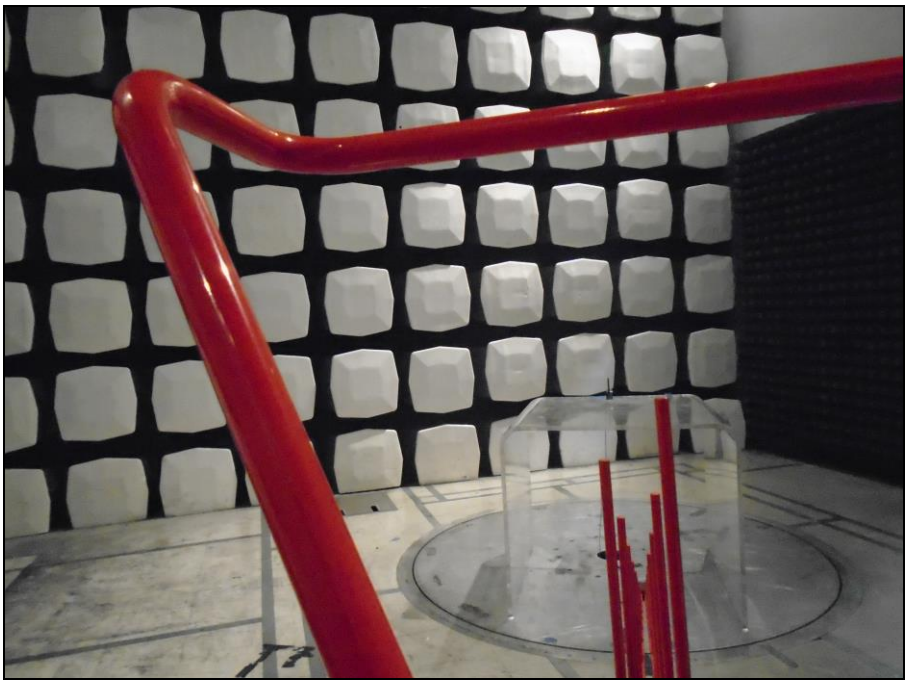


Plot 21. Radiated Spurious Emissions, Mid Channel, 1 GHz – 10 GHz, Peak

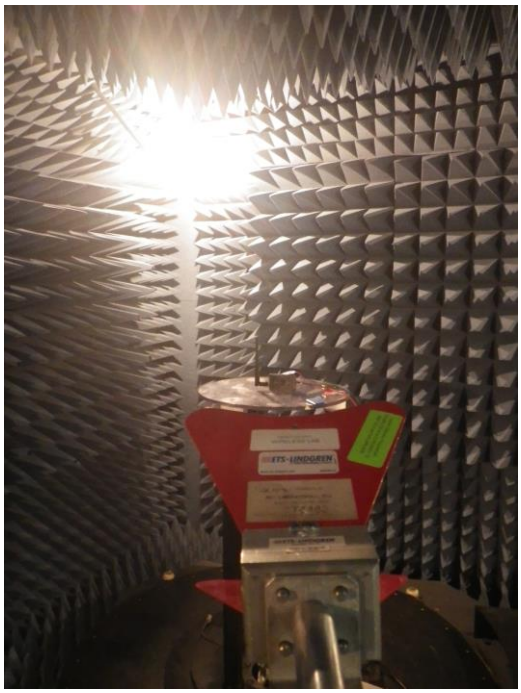


Plot 22. Radiated Spurious Emissions, High Channel, 1 GHz – 10 GHz, Peak

Radiated Spurious Emissions Test Setup



Photograph 2. Radiated Spurious Emissions, Below 1 GHz, Test Setup



Photograph 3. Radiated Spurious Emissions, Above 1 GHz, Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

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. Test was performed conducted.

Test Results: The EUT was compliant with the Conducted Spurious Emission limits of **§15.247(d)**. Emissions were 20dBc below the fundamental frequency.

Test Engineer(s): Deepak Giri

Test Date(s): March 24, 2017

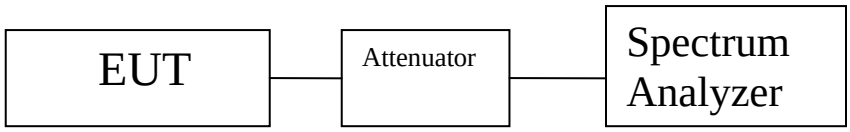
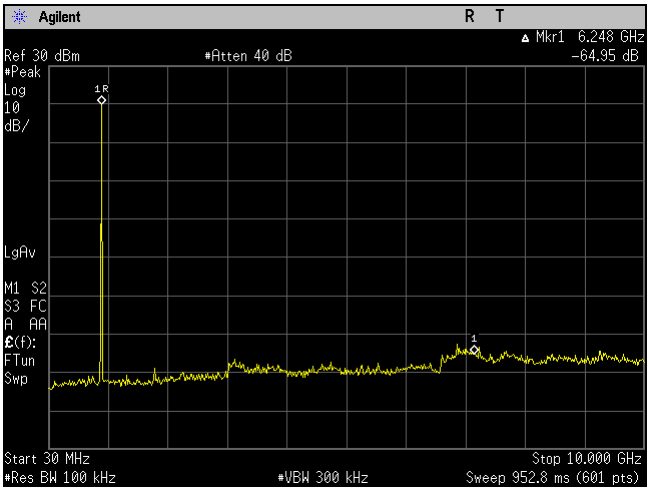
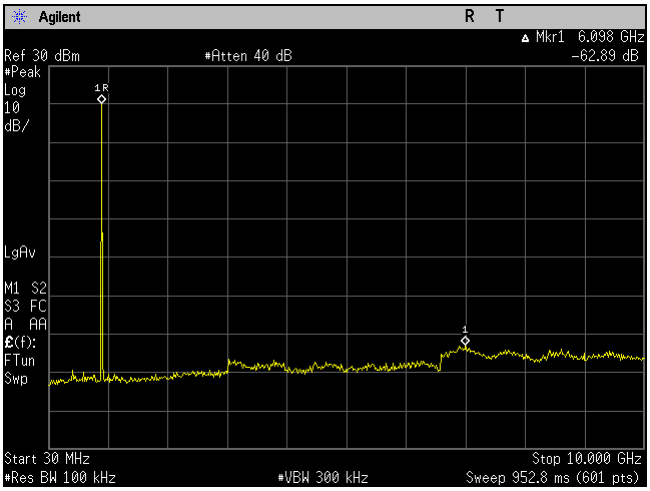


Figure 4. Block Diagram, Conducted Spurious Emissions Test Setup

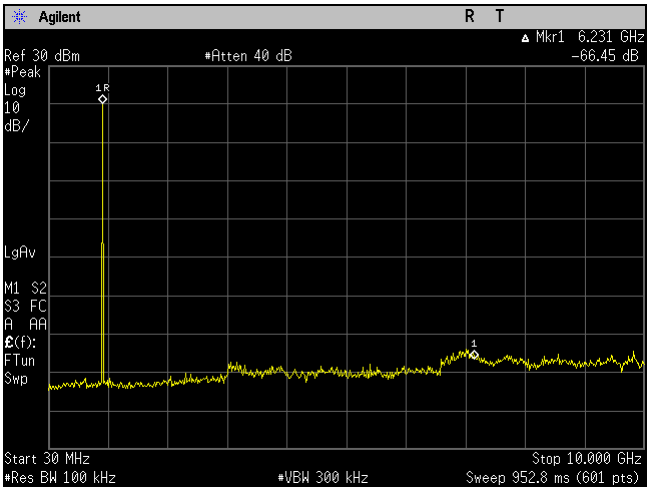
Conducted Spurious Emissions Test Results



Plot 23. Conducted Spurious Emissions, Low Channel, 30 MHz – 10 GHz

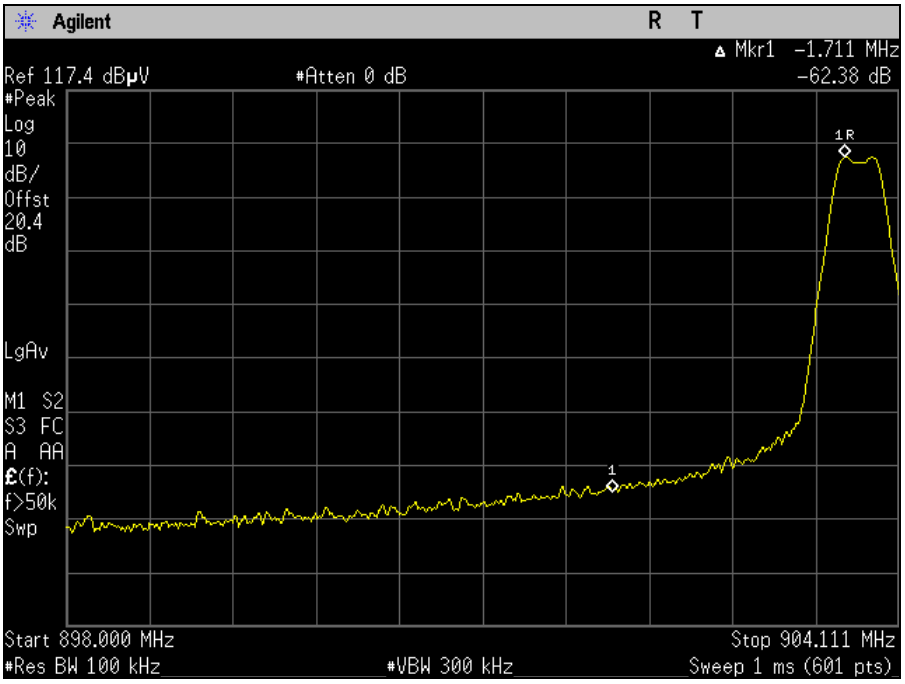


Plot 24. Conducted Spurious Emissions, Mid Channel, 30 MHz – 10 GHz

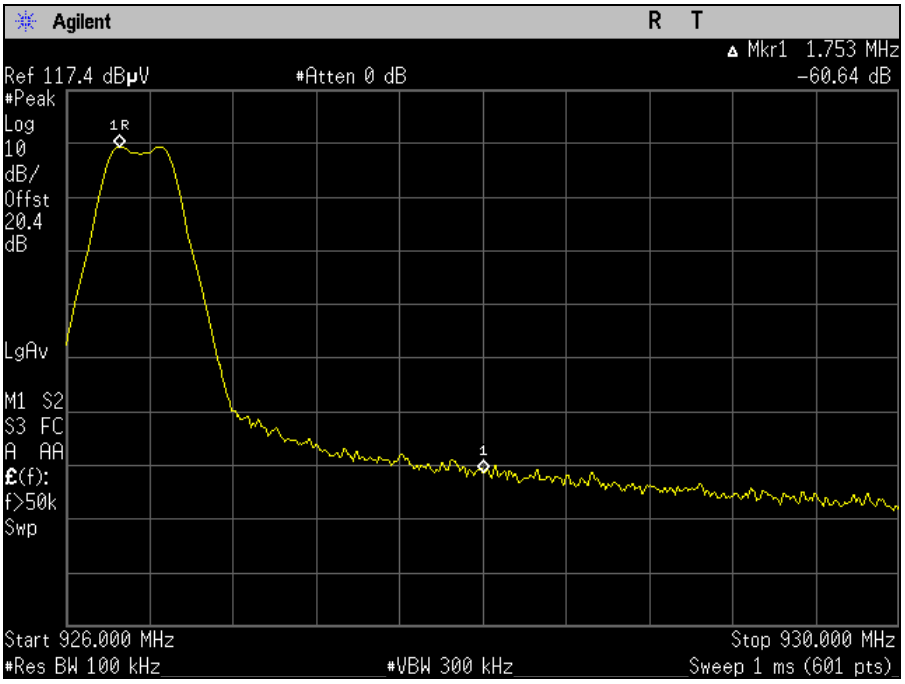


Plot 25. Conducted Spurious Emissions, High Channel, 30 MHz – 10 GHz

Conducted Band Edge Test Results



Plot 26. Conducted Band Edge, Low



Plot 27. Conducted Band Edge, High

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(g)(h) Declaration Statements for FHSS

Requirement: (g) Frequency hopping spread spectrum systems are not required to employ all available hopping channels during each transmission. However, the system, consisting of both the transmitter and the receiver, must be designed to comply with all of the regulations in this section should the transmitter be presented with a continuous data (or information) stream. In addition, a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.

(h) The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.


Paragon Robotics LLC

FHSS : 902 MHz – 928 MHz:
Number of channels: 25
Dwell time: 0.25s
Return time: 11.75s

Mr. Julian Lamb
President
Paragon Robotics LLC
mobile: 330.977.7981
email (commercial): julian.lamb@paragonrobotics.com
email (NIPRNet): julian.lamb.ctr@us.af.mil

Photograph 4. Declaration Statement for FHSS from Customer

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.

Note: **Power Spectral density limit for 300 – 900 MHz frequency range is given by S = F/1500**

$$S = PG / 4\pi R^2 \quad \text{or} \quad R = \sqrt{PG / 4\pi S}$$

where, S = Power Density
P = Power Input to antenna
G = Antenna Gain

FCC									
Frequency (MHz)	**Con. Pwr. (dBm)**	**Con. Pwr. (mW)**	**Ant. Gain (dBi)**	**Ant. Gain numeric**	**Pwr. Density (mW/cm^2)**	**Limit (mW/cm^2)**	**Margin**	**Distance (cm)**	**Result**
926.37	20.9	123.027	1	1.259	0.03081	0.61758	0.58677	20	Pass

Table 15. MPE, Test Results

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 17025:2005.

MET Asset #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1T4751	Antenna - Bilog	Sunol Sciences	JB6	2/28/2017	8/28/2018
1T4300	SEMI-ANECHOIC CHAMBER # 1 (NSA)	EMC TEST SYSTEMS	NONE	2/6/2015	2/6/2018
1S2421	EMI Test Receiver	Rohde & Schwarz	ESIB7	2/2/2017	2/2/2018
1T4771	PSA Spectrum Analyzer	Agilent Technologies	E4446A	8/10/2016	2/10/2018
1T4149	High-Frequency Anechoic Chamber	Ray Proof	81	Not Required	
1T4483	Antenna; Horn	ETS-Lindgren	3117	4/19/2017	10/19/2018
1T4442	Pre-amplifier, Microwave	Miteq	AFS42-01001800-30-10P	See Note	
1T4859	Digital Barometer, Hygrometer, Thermometer	Control Company	15-078-198, FB70423, 245CD	2/10/2016	2/10/2018

Table 16. 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 users 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

