


# Test Report for the FCC and ISED Testing of an Raspberry Pi Pico 2 W to FCC Rule 47CFR 15.247 and ISED RSS-247 for Raspberry Pi Ltd

Report number: C15656TR3

Project number: C8779

Author: ..... 

L Trickett

Radio Test Engineer

Checked: ..... 

J Beevers MPhys (Hons), PhD

Radio Testing Team Lead

Approved: ..... 

J Beevers MPhys (Hons), PhD

Radio Testing Team Lead

Issue	Description						Issue by	Date
3	Copy 1		Copy 2		PDF	√	JB	14 <sup>th</sup> October 2024

This report shall not be reproduced, except in full without the prior written approval of Eurofins E&E UK Ltd  
The results contained in this report are only applicable to the apparatus tested.

**CONTENTS**

<b>Test Report Change History .....</b>	<b>5</b>
<b>Section 1      Test Location .....</b>	<b>6</b>
1.1      UKAS Accreditation .....	6
<b>Section 2      Customer Information .....</b>	<b>7</b>
<b>Section 3      Equipment Details .....</b>	<b>8</b>
3.1      Equipment Under Test (EUT) .....	8
3.2      EUT Photographs .....	9
3.3      Configuration of EUT .....	9
3.4      EUT Monitoring/Auxiliary Equipment .....	10
3.5      Monitoring Software .....	10
<b>Section 4      Test Specifications .....</b>	<b>11</b>
4.1      Knowledge Database References .....	13
4.1.1      Radiated Emissions (30MHz to 1000MHz) .....	13
4.1.2      Radiated Emissions (1GHz to 40GHz) .....	13
4.2      Compliance Statement .....	13
<b>Section 5      Spurious Emission Results – Radiated and Conducted .....</b>	<b>14</b>
5.1      Test Specification .....	14
5.2      Procedure and Test Software Version .....	14
5.3      Radiated Emissions (30MHz to 1GHz) .....	15
5.3.1      Limits at 3m .....	15
5.3.2      Emissions measurements .....	15
5.3.3      Date of Test .....	15
5.3.4      Test Area .....	15
5.3.5      Tested by .....	15
5.3.6      Test Setup .....	16
5.3.7      Electric field emissions, 30MHz to 1GHz .....	17
5.4      Radiated Emissions (1GHz to 18GHz) .....	20
5.4.1      Limits .....	20
5.4.2      Receiver Settings .....	20
5.4.3      Emissions measurements .....	20
5.4.4      Date of Test .....	20
5.4.5      Test Area .....	20
5.4.6      Tested by .....	20
5.4.7      Test Setup .....	21
5.4.8      Exploratory Radiated Emission Maximization .....	22
5.4.9      Electric field emissions, 1GHz to 18GHz .....	24
5.4.10      Example field strength calculation .....	26
5.4.11      Sample Data .....	26
5.5      Radiated Emissions (18GHz to 25GHz) .....	27
5.5.1      Limits .....	27
5.5.2      Receiver Settings .....	27
5.5.3      Emissions measurements .....	27
5.5.4      Date of Test .....	27
5.5.5      Test Area .....	27
5.5.6      Tested by .....	27
5.5.7      Test Setup .....	27
5.5.8      Exploratory Radiated Emission Maximization .....	28
5.6      Conducted Spurious Emissions 30MHz to 25GHz .....	30
5.6.1      Limits .....	30
5.6.2      Emissions measurements .....	30
5.6.3      Date of Test .....	30
5.6.4      Test Area .....	30
5.6.5      Tested by .....	30
5.6.6      Test Setup .....	31
5.6.7      Test Results .....	31

5.6.8	Antenna port conducted emissions, 30MHz to 25GHz .....	32
<b>Section 6</b>	<b>20dB Bandwidth and 99% Occupied Bandwidth .....</b>	<b>34</b>
6.1	Test Specification .....	34
6.2	Procedure and Test Software Version .....	34
6.2.1	Emissions measurements .....	35
6.2.2	Date of Test .....	35
6.2.3	Test Area .....	35
6.2.4	Tested by .....	35
6.2.5	Test Setup .....	35
6.2.6	Test Results .....	35
<b>Section 7</b>	<b>Peak Output Power .....</b>	<b>39</b>
7.1	Test Specification .....	39
7.2	Procedure and Test Software Version .....	39
7.2.1	Emissions measurements .....	40
7.2.2	Date of Test .....	40
7.2.3	Test Area .....	40
7.2.4	Tested by .....	40
7.2.5	Test Setup .....	40
7.2.6	Test Result .....	41
<b>Section 8</b>	<b>Frequency Hopping Spread Spectrum Requirements .....</b>	<b>44</b>
8.1	Number of Hopping Frequencies .....	44
8.1.1	Date of Test .....	44
8.1.2	Test Area .....	44
8.1.3	Tested by .....	44
8.1.4	Test Setup .....	44
8.1.5	Test Results .....	45
8.2	Frequency Hopping Channel Separation .....	46
8.2.1	Date of Test .....	46
8.2.2	Test Area .....	46
8.2.3	Tested by .....	46
8.2.4	Test Setup .....	46
8.2.5	Requirement 47CFR15.247(a)(1) .....	46
8.2.6	Procedure .....	47
8.2.7	Test Results .....	47
8.3	Hopping Channel Occupancy Time .....	48
8.3.1	Date of Test .....	48
8.3.2	Test Area .....	48
8.3.3	Tested by .....	48
8.3.4	Test Setup .....	48
8.3.5	Requirement 47CFR15.247(a)(1)(iii) .....	48
8.3.6	Procedure .....	49
8.3.7	Test Results .....	49
<b>Section 9</b>	<b>Band Edge Compliance .....</b>	<b>51</b>
9.1	Test Specification .....	51
9.2	Procedure and Test Software Version .....	51
9.2.1	Emissions measurements .....	52
9.2.2	Date of Test .....	52
9.2.3	Test Area .....	52
9.2.4	Tested by .....	52
9.2.5	Test Setup .....	52
9.2.6	Test Results .....	52
<b>Appendix A</b>	<b>EUT Test Photos .....</b>	<b>56</b>
<b>Appendix B</b>	<b>Test Equipment List .....</b>	<b>57</b>

**List of Figures**

Figure 1 Test Setup for E-Field Measurements from 30MHz to 1GHz .....	16
Figure 2 Electric field emissions Plot, 30MHz to 1GHz, 2440MHz Operation.....	17
Figure 3 Electric field emissions Plot, 30MHz to 1GHz, Operation on 2402MHz - Peak detector scan .....	19
Figure 4 Electric field emissions Plot, 30MHz to 1GHz, Operation on 2480MHz - Peak detector scan .....	19
Figure 5 Test Setup for Final E-Field Measurements from 1GHz to 18GHz.....	21
Figure 6 – Manual investigation – Operating on BT channel 2480MHz.....	23
Figure 7 Electric field emissions Plot, 1GHz to 8GHz. Operation on 2402MHz.....	24
Figure 8 Electric field emissions Plot, 1GHz to 8GHz, Operation on 2440MHz - Peak detector scan.....	25
Figure 9 Electric field emissions Plot, 1GHz to 8GHz, Operation on 2480MHz – Peak detector scan.....	25
Figure 10 – Manual investigation – Operating on BT channel 2402MHz.....	28
Figure 11 – Manual investigation – Operating on BT channel 2440MHz.....	29
Figure 12 – Manual investigation – Operating on BT channel 2480MHz.....	29
Figure 13 Conducted emissions 30MHz to 25GHz. Operation on channel 2402MHz. ....	32
Figure 14 Conducted emissions 30MHz to 25GHz. Operation on channel 2440MHz. ....	32
Figure 15 Conducted emissions 30MHz to 25GHz. Operation on channel 2480MHz. ....	33
Figure 16 Bandwidth at 20dB Point. Operation on channel 2402MHz.....	36
Figure 17 Bandwidth at 20dB Point. Operation on channel 2440MHz.....	36
Figure 18 Bandwidth at 20dB Point. Operation on channel 2480MHz.....	37
Figure 19 99% Occupied Bandwidth. Operation on channel 2402MHz.....	37
Figure 20 99% Occupied Bandwidth. Operation on channel 2440MHz.....	38
Figure 21 99% Occupied Bandwidth. Operation on channel 2480MHz.....	38
Figure 22 Peak output power, Operation on channel 2402MHz.....	42
Figure 23 Peak output power, Operation on channel 2440MHz.....	42
Figure 24 Peak output power, Operation on channel 2480MHz.....	43
Figure 25 Number of hopping frequencies (1/2).....	45
Figure 26 Number of hopping frequencies (2/2).....	45
Figure 27 Carrier frequency separation.....	47
Figure 28 Transmit time per hop .....	49
Figure 29 Number of Hops in specified period .....	50
Figure 30 Band Edge Measurement – upper band edge - horizontal polarity.....	54
Figure 31 Band Edge Measurement – upper band edge - vertical polarity.....	54
Figure 32 Band Edge Measurement – lower band edge - horizontal polarity .....	55
Figure 33 Band Edge Measurement – lower band edge - vertical polarity .....	55

**List of Tables**

Table 1 Electric Field Emissions Peaks, 30MHz to 1GHz. 2402MHz Operation .....	18
Table 2 Frequencies identified during Exploratory Radiated Emission maximization.....	22
Table 3 Electric Field Emissions Peaks, 1GHz to 8GHz – Operation on 2440MHz.....	24
Table 4 Frequencies identified during Exploratory Radiated Emission maximization.....	28
Table 5 Bandwidth Measurements .....	35
Table 6 Peak Output Power Measurements.....	41
Table 7 Operation on 2480MHz Channel, Peak detector measurements.....	53
Table 8 Operation on Channel 2480MHz, Average detector measurements .....	53
Table 9 Operation on channel 2402MHz Peak detector measurements .....	53
Table 10 Operation on channel 2402MHz Average detector measurements .....	53

Test Report Change History

Issue	Date	Modification Details
1	27 <sup>th</sup> September 2024	First Issue
2	7 <sup>th</sup> October 2024	Customer email amended
3	14 <sup>th</sup> October 2024	Exploratory graph added
4		
5		
6		
7		
8		
9		
10		

## Section 1 Test Location

All testing was performed at;

<b>Eurofins E&amp;E UK</b>	Unit 5
	Speedwell Road
	Castleford
	WF10 5PY
<b>Tel:</b>	01977 731173
<b>Website</b>	<a href="http://www.yorkemc.co.uk">http://www.yorkemc.co.uk</a>
<b>UKAS Testing No.</b>	1574

## UKAS Accreditation

Opinions and interpretations expressed herein are outside the scope of UKAS Accreditation.

Eurofins E&E UK latest accreditation schedule can be found at:

[http://www.ukas.org/testing/lab\\_detail.asp?lab\\_id=989&location\\_id=&vMenuOption=3](http://www.ukas.org/testing/lab_detail.asp?lab_id=989&location_id=&vMenuOption=3)

Eurofins E&E UK Castleford Laboratory, is an Accredited facility recognised by the Federal Communications Commission (FCC) for certification testing. The appropriate FCC Designation Number is UK2013, dated 1<sup>st</sup> March 2021.

Eurofins E&E UK Castleford Laboratory is recognised by ISED for certification testing.

ISED Assigned Code: 22959

CAB Identifier: UK0004

**Section 2 Customer Information**

<b>Company name</b>	Raspberry Pi Ltd
<b>Address</b>	194 Cambridge Science Park
	Milton Road
	Cambridge
	CB4 0AB
	United Kingdom
<b>Contact</b>	Tom Westcott
<b>Email</b>	compliance@raspberrypi.com

### Section 3 Equipment Details

#### Equipment Under Test (EUT)

<b>Date received:</b>	9 <sup>th</sup> September 2024
<b>EUT name:</b>	Raspberry Pi Pico 2 W
<b>PMN:</b>	Raspberry Pi Pico 2 W
<b>HVIN:</b>	Raspberry Pi Pico 2 W
<b>FCC ID:</b>	2ABCB-PICO2W
<b>IC:</b>	20953-PICO2W
<b>EUT description:</b>	The Raspberry Pi Pico 2 W is a mini-PC with an on board radio module and antenna. The module has 2.4GHz Wi-Fi, Bluetooth classic and Bluetooth Low Energy functionality, which allows the user to connect to a 2.4GHz Wi-Fi network, BT Classic 5 compliant devices and BLE devices.
<b>Antenna</b>	Integral Antenna
<b>Transmission</b>	Frequency Hopping Spread Spectrum (FHSS) Bluetooth Classic
<b>Modulation scheme</b>	0xF0 8-bit Pattern
<b>Operating frequency band</b>	2400MHz to 2483.5MHz
<b>No of units tested:</b>	Unit 1: Radiated tests Unit 2: Conducted tests
<b>EUT power:</b>	3.3V via USB port
<b>Highest internal frequency:</b>	2.480GHz
<b>Mode/s of operation:</b>	Continuous transmit of packetised data at top, middle and bottom channels. Channels used: 2402MHz, 2440MHz and 2480MHz. Normal hopping operation.
<b>Test software:</b>	The EUT was tested with bt_mfg_test.uf2 Test Firmware installed. The EUT test modes were controlled via USB connection to a Raspberry Pi 400 device. The output power was set to the default value in the test software.
<b>Modifications incorporated during testing:</b>	N/A

Ports and Cables	Cable Length	Screened/ unshielded	Connected to
USB cable	1m	unshielded	Raspberry Pi 400

#### EUT Monitoring/Auxiliary Equipment

Equipment name	Type no.	Serial no
Raspberry Pi 400	RPI-400	80000214328



**EUT Photographs**

Photographs are supplied separately.

**Configuration of EUT**

The apparatus was supplied in one single possible configuration.

BT Channel Number	Frequency	BT Channel Number	Frequency	BT Channel Number	Frequency
0	2402 MHz	27	2429 MHz	53	2455 MHz
1	2403 MHz	28	2430 MHz	54	2456 MHz
2	2404 MHz	29	2431 MHz	55	2457 MHz
3	2405 MHz	30	2432 MHz	56	2458 MHz
4	2406 MHz	31	2433 MHz	57	2459 MHz
5	2407 MHz	32	2434 MHz	58	2460 MHz
6	2408 MHz	33	2435 MHz	59	2461 MHz
7	2409 MHz	34	2436 MHz	60	2462 MHz
8	2410 MHz	35	2437 MHz	61	2463 MHz
9	2411 MHz	36	2438 MHz	62	2464 MHz
10	2412 MHz	37	2439 MHz	63	2465 MHz
11	2413 MHz	38	2440 MHz	64	2466 MHz
12	2414 MHz	39	2441 MHz	65	2467 MHz
13	2415 MHz	40	2442 MHz	66	2468 MHz
14	2416 MHz	41	2443 MHz	67	2469 MHz
15	2417 MHz	42	2444 MHz	68	2470 MHz
16	2418 MHz	43	2445 MHz	69	2471 MHz
17	2419 MHz	44	2446 MHz	70	2472 MHz
18	2420 MHz	45	2447 MHz	71	2473 MHz
19	2421 MHz	46	2448 MHz	72	2474 MHz
20	2422 MHz	47	2449 MHz	73	2475 MHz
21	2423 MHz	48	2450 MHz	74	2476 MHz
22	2424 MHz	49	2451 MHz	75	2477 MHz
23	2425 MHz	50	2452 MHz	76	2478 MHz
24	2426 MHz	51	2453 MHz	77	2479 MHz
25	2427 MHz	52	2454 MHz	78	2480 MHz
26	2428 MHz	-	-	-	-

**BT Channelization**

Lowest channel	Default
Middle channel	Default
Highest channel	Default

**Power settings table**

Note: Modulation type 0xF0 8-bit Pattern. Packet type 3-DH1. Packet length 65535 used for all tests.

**EUT Monitoring/Auxiliary Equipment**

None.

**Monitoring Software**

None. The channel required was selected via software prior to the testing.

**Section 4 Test Specifications****For USA:**

<b>Regulation / Test Standard</b>	<p>Regulation:</p> <p>Title 47 of the Code of Federal Regulations (CFR) Part 15 (47CFR15) Subpart C – Intentional Radiators</p> <p>Measurement standard:</p> <p>ANSI C63.10-2013 American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices</p>
-----------------------------------	---

Test description	Rule Part	Result Summary
Intentional emission, band occupancy, 20dB bandwidth	47 CFR 15.215(C) 47 CFR 15.247 (a)(1)	Pass
FHSS Requirements	Number of hopping channels 47CFR15.247(a)(1)(iii)	Pass
	Channel separation 47CFR15.247(a)(1)(iii)	Pass
	Hopping channel occupancy time 47CFR15.247(a)(1)(iii)	Pass
Peak power output (conducted)	47 CFR 15.247 b (1)	Pass
Radiated spurious emissions 30MHz to 25GHz	15.247(d)	Pass
Restricted band compliance	47CFR15.247(d) and 45CFR15.205 and 47CFR15.209	Pass
Conducted spurious emissions	FCC § 15.247(d)	Pass
Mains conducted emissions 150kHz to 30MHz Applicable if the apparatus connects to the AC supply directly or via other apparatus.	47 CFR Part 15C Section 15.207 Test standard: ANSI C63.10-2013 Not applicable – not mains powered	Not applicable

**For Canada:**

<b>Regulation / Test Standard</b>	<p>RSS-247 Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSS) and Licence-Exempt Local Area Network (LE-LAN) Devices Issue 3 August 2023</p> <p>And,</p> <p>RSS-Gen — General Requirements for Compliance of Radio Apparatus Issue 5 April 2018 +A1 March 2019 +A2 February 2021</p>
-----------------------------------	---

Test description	RSS Reference	Result Summary
Intentional emission, band occupancy	-	Pass
99% Occupied Bandwidth	RSS-GEN Issue 5 April 2018 Section 6.7	Pass
FHSS Requirements	<p>RSS-247 Issue 3 Section 5.1 Channel separation Hopping sequence System receiver bandwidth Number of hopping channels Hopping channel occupancy time</p>	Pass
Peak power output (conducted)	RSS-247 Issue 3 Section 5.4 (b)	Pass
Radiated spurious emissions	RSS-247 Issue 3 Section 5.5	Pass
Restricted band compliance	<p>RSS-247 Issue 3 Sections 3.3 and 5.5 RSS-Gen Issue 5 Section 8.10</p>	Pass
Conducted spurious emissions	RSS-247 Issue 3 section 5.5	Pass
AC power line conducted emissions	<p>RSS-247 Issue 3 Section 3.1 RSS Gen Section 8.8</p>	Not applicable

**Knowledge Database References**

The following KDBs were referenced during the testing.

The latest knowledge database references are available via the FCC KDB website at:

<https://apps.fcc.gov/kdb>

**4.1.1 Radiated Emissions (30MHz to 1000MHz)**

Publication Number	Keyword	Publication Date
913591	Measurement of radiated emissions at the band-edge for a Part 15 RF Device	04/05/2017

**4.1.2 Radiated Emissions (1GHz to 40GHz)**

Publication Number	Keyword	Publication Date
414788	Test Site Validation Requirements above 1 GHz.	07/12/2018
414788	Comparison Noise Emitter (CNE), reference noise source, .pdf	07/12/2018
913591	Measurement of radiated emissions at the band-edge for a Part 15 RF Device	04/05/2017
414788	Comparison Noise Emitters (CNE), test equipment, Broadband.pdf	07/12/2018

**Compliance Statement**

The Raspberry Pi Pico 2 W, as tested, was shown to meet requirements of the standards listed in Section 4 of this report.

Note: Only the Bluetooth Classic functionality has been testing in this report.

## Section 5 Spurious Emission Results – Radiated and Conducted

### Test Specification

FCC Rule Part	47CFR 15.247 (d)
Standard	ANSI C63.10:2013
Measurement Uncertainty Radiated tests	The reported uncertainty of measurement $y \pm U$ , where expended uncertainty $U$ is based on a standard uncertainty multiplied by a coverage factor of $k=2$ , providing a level of confidence of approximately 95% is  +/- 5.01dB for the frequency range from 9kHz to 30MHz +/- 6.26dB for the frequency range 30MHz to 1GHz +/- 5.14dB for the frequency range from 1GHz to 6GHz +/- 5.45dB for the frequency range from 6GHz to 18GHz
Measurement Uncertainty Conducted Power tests	$\pm 1.4$ dB

### Procedure and Test Software Version

**Radiated tests:- 47CFR15.205 and 47CFR15.209**

Eurofins E&E UK test procedure (30MHz to 1GHz)	CEP23 Issue 10
Eurofins E&E UK test procedure (1GHz to 40GHz)	CEP64 Issue 11
Test software	RadiMation Version 2023.1.6

### Conducted Tests 47CFR 15.247(d)

ANSi C63.10-2013 Clause reference:	11.11.2 and 11.11.3
Test software	N/A

**Radiated Emissions (30MHz to 1GHz)**

Radiated electric field emission measurements are applied as defined in 47CFR15.205 and 47CFR15.209.

**5.1.1 Limits at 3m**

Frequency (MHz)	Electric Field strength Limit (dBµV/m) at 3m measurement distance
	Quasi Peak
30 - 88	40.0
88 -216	43.5
216 - 960	46.0
960- 1000	54.0

Note: FCC 47 CFR Part 15 Section 15.209 and 15.205 specifies test limits at 3m

**Receiver Settings**

Receiver Parameters	Setting
Detector Function	Quasi Peak
Start Frequency	30MHz
Stop Frequency	1000MHz
Resolution Bandwidth	120kHz
Video Bandwidth	Auto

**5.1.2 Emissions measurements****5.1.3 Date of Test**

16th September 2024

**5.1.4 Test Area**

LAB 1 (SAC)

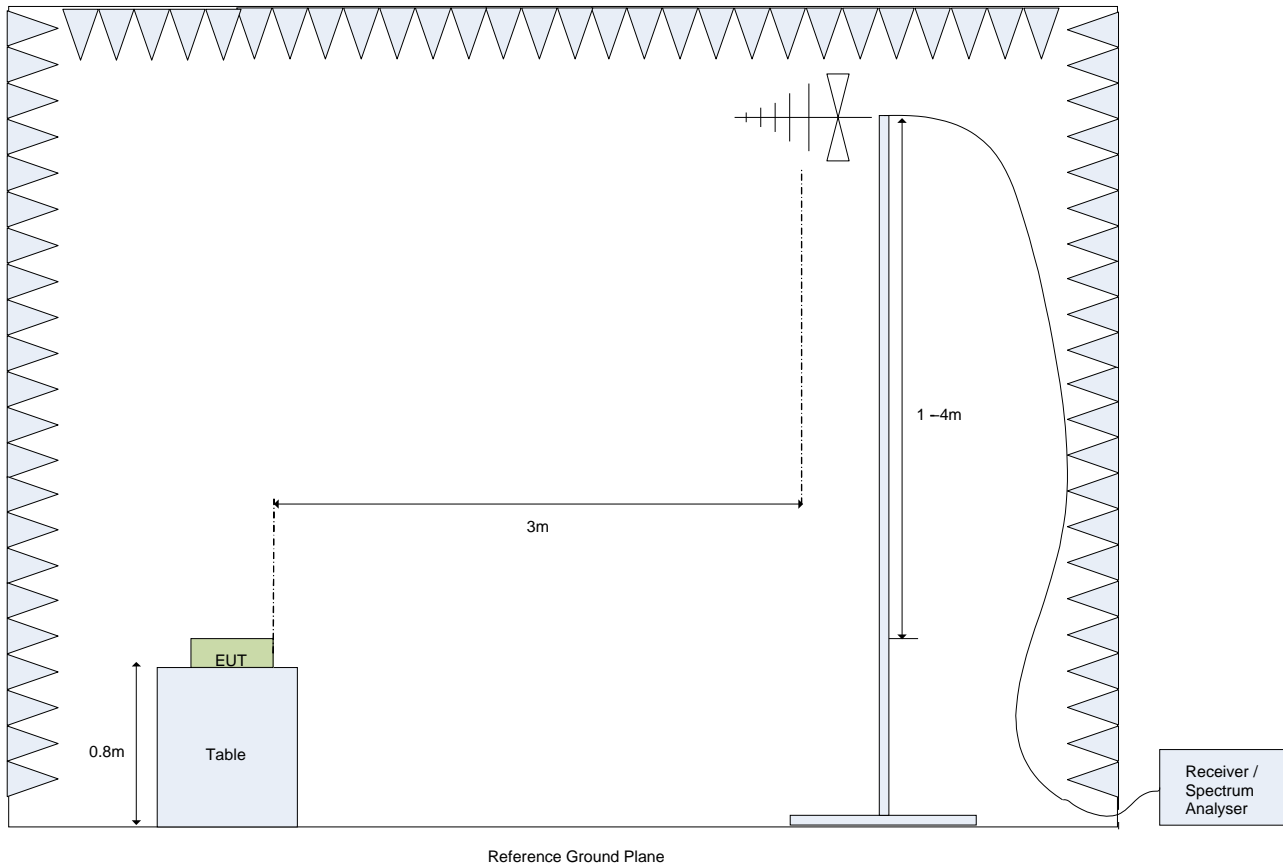
**5.1.5 Tested by**

L Trickett

### 5.1.6 Test Setup

The EUT was configured in the SAC on an 80cm high polystyrene table.

The measurement was performed with an antenna to EUT separation distance of 3m. The results were maximised in orientation 0-360 degrees and height 1-4m.



**Figure 1 Test Setup for E-Field Measurements from 30MHz to 1GHz**

Note 1 : With the EUT de-energized the ambient radio noise and signals met the 6dB peak detection requirement of ANSI C63.10-2013.

Note 2 : There were no significant environmental temperature changes during the test duration and hence it was not considered necessary to consider any variation in cable loss.

### Operating Mode During testing

During spurious emission testing the equipment under test was set to transmit at the same frequency on the following channels: 2402MHz, 2440MHz and 2480MHz.

The equipment under test was pre-scanned using peak detection when operating on all three channels. Final measurements were performed with the equipment under test operating on 2440MHz.



## 5.1.7 Electric field emissions, 30MHz to 1GHz

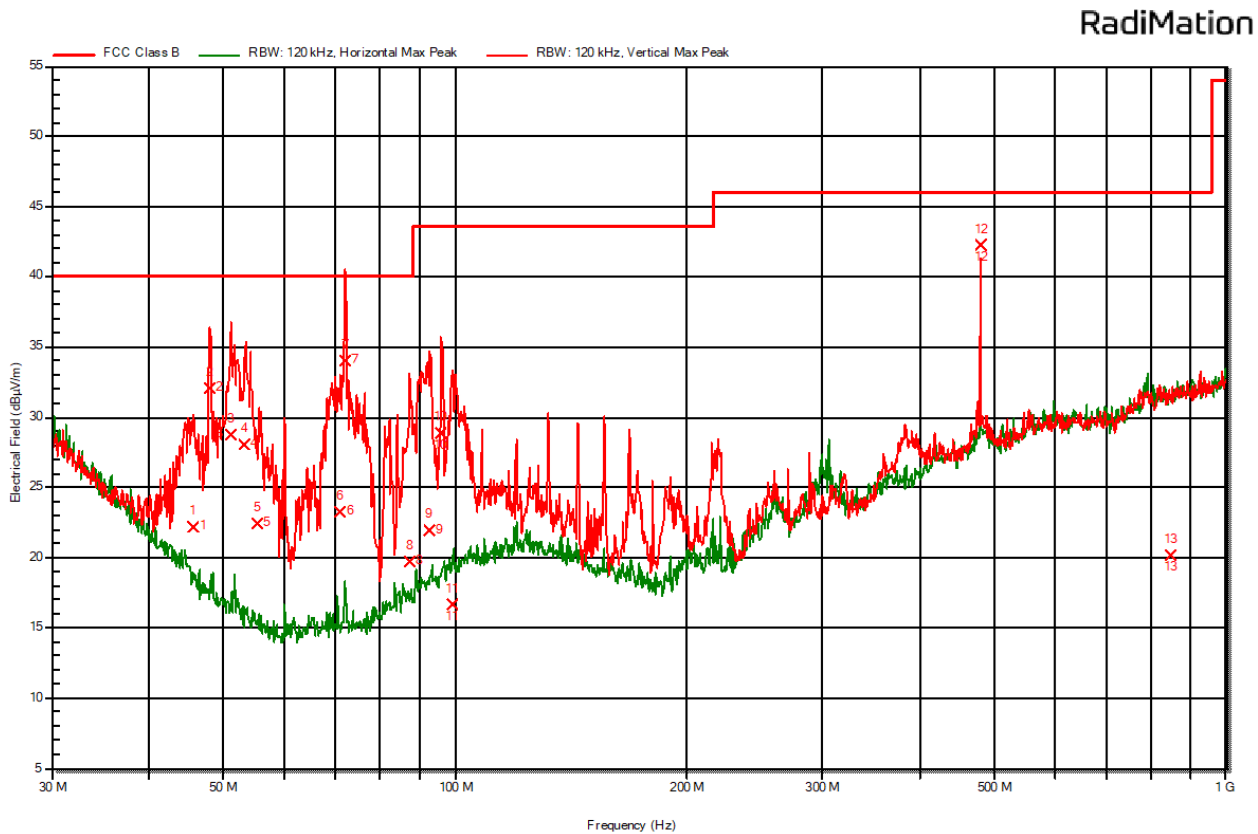


Figure 2 Electric field emissions Plot, 30MHz to 1GHz, 2440MHz Operation

Frequency MHz	Quasi- Peak dB $\mu$ V/m	Quasi Peak Limit dB $\mu$ V/m	Quasi- Peak Difference dB	Quasi- Peak Status	Angle degrees	Height m	Polarization
45.72	22.2	40.0	-17.8	Pass	205	1.0	Vertical
48.00	32.0	40.0	-8.0	Pass	125	1.0	Vertical
51.12	28.7	40.0	-11.3	Pass	40	1.0	Vertical
53.40	28.1	40.0	-11.9	Pass	360	1.0	Vertical
55.50	22.4	40.0	-17.6	Pass	325	1.0	Vertical
70.86	23.2	40.0	-16.8	Pass	310	2.0	Vertical
72.00	34.1	40.0	-5.9	Pass	45	1.4	Vertical
87.24	19.7	40.0	-20.3	Pass	250	1.1	Vertical
92.64	22.0	43.5	-21.5	Pass	105	1.1	Vertical
96.00	28.8	43.5	-14.7	Pass	40	1.5	Vertical
99.30	16.7	43.5	-26.8	Pass	40	1.8	Vertical
480.06	42.2	46.0	-3.8	Pass	5	2.0	Vertical
848.88	20.2	46.0	-25.8	Pass	295	4.0	Vertical

Table 1 Electric Field Emissions Peaks, 30MHz to 1GHz. 2402MHz Operation

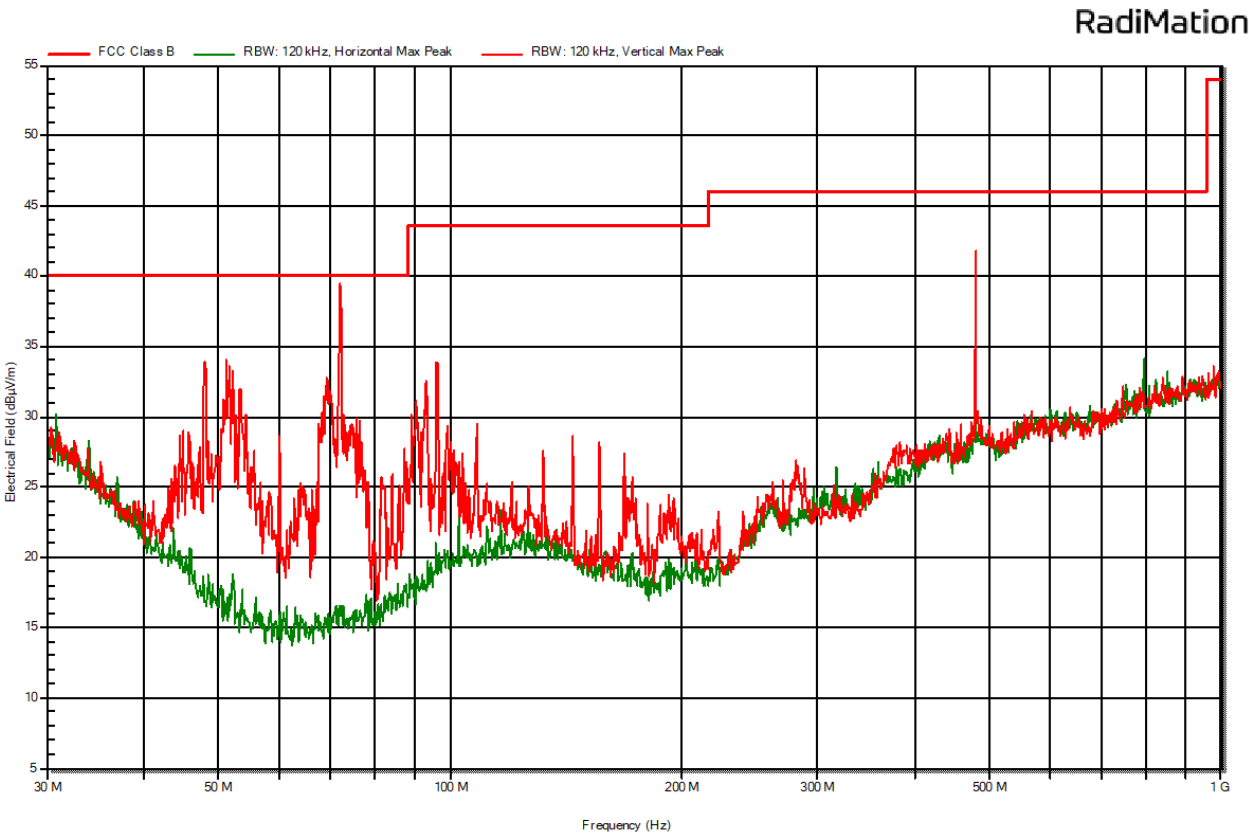


Figure 3 Electric field emissions Plot, 30MHz to 1GHz, Operation on 2402MHz - Peak detector scan

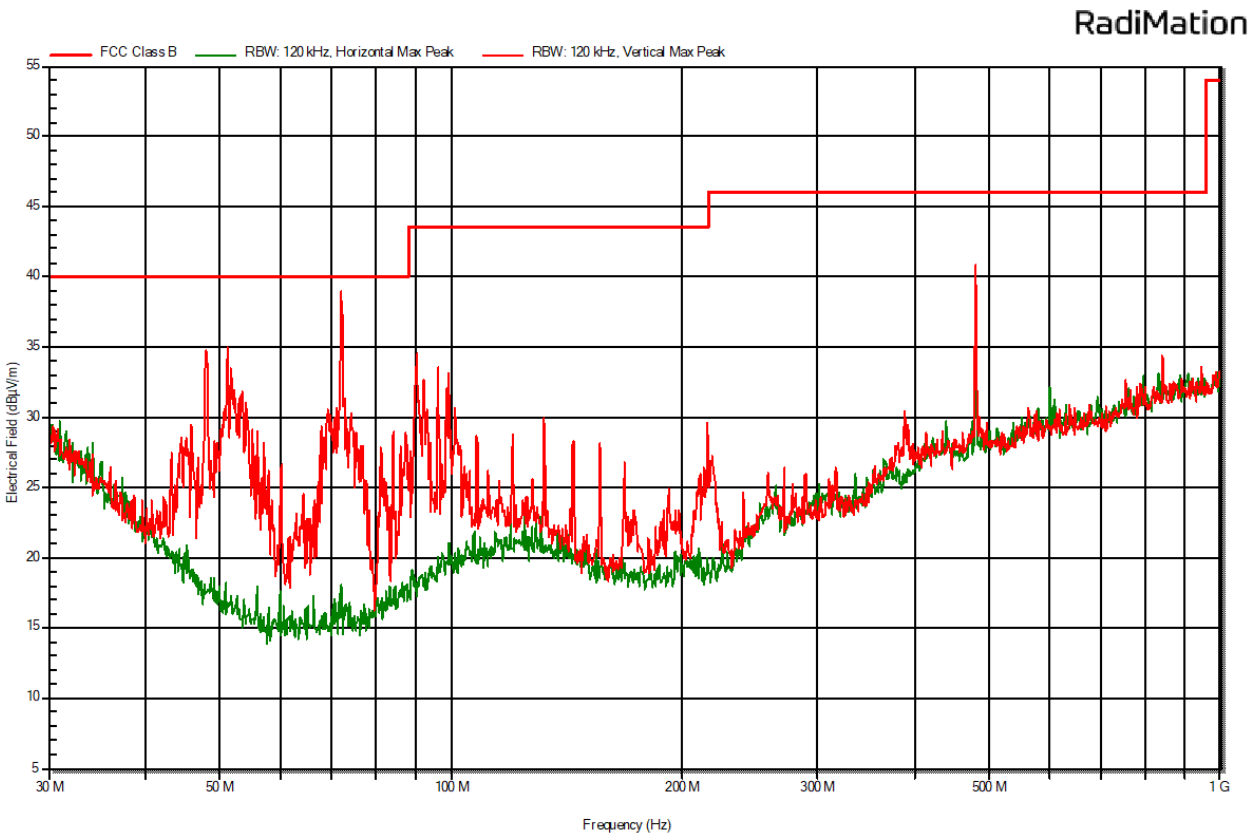


Figure 4 Electric field emissions Plot, 30MHz to 1GHz, Operation on 2480MHz - Peak detector scan

**Radiated Emissions (1GHz to 18GHz)****5.1.8 Limits**

Frequency (GHz)	Limit (dB $\mu$ V/m)	Limit (dB $\mu$ V/m)
	Peak	Average
1-18	74.0	54.0

**5.1.9 Receiver Settings**

Receiver Parameters	Setting
Detector Function	Average and Peak
Start Frequency	1GHz
Stop Frequency	18GHz
Resolution Bandwidth	1MHz
Video Bandwidth	Auto

**5.1.10 Emissions measurements****5.1.11 Date of Test**17<sup>th</sup> September 2024**5.1.12 Test Area**

LAB 1 (SAC)

**5.1.13 Tested by**

L Trickett

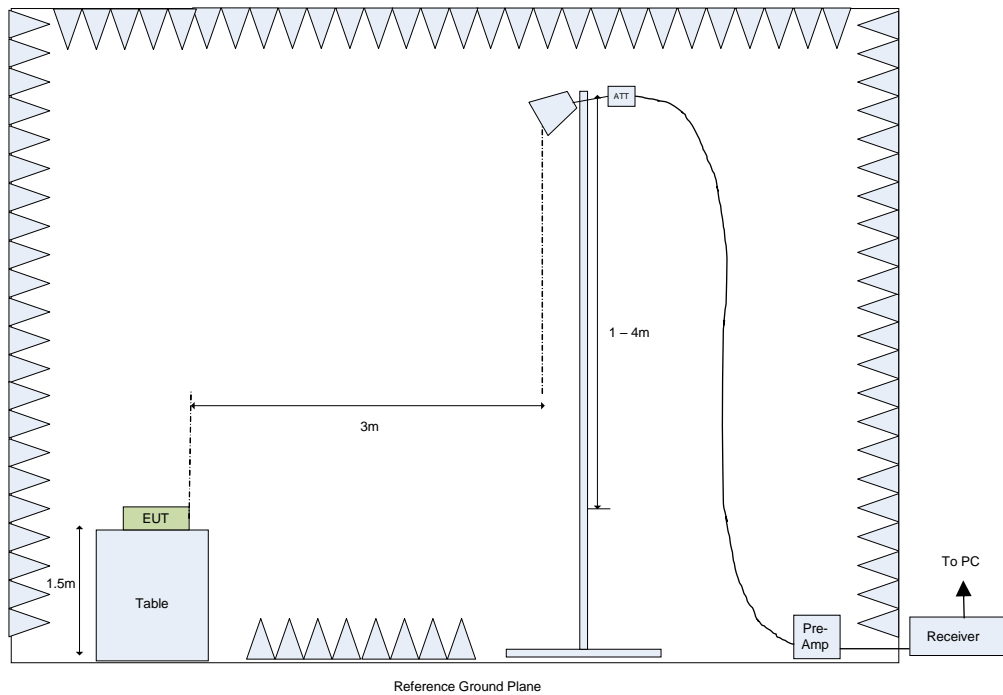
### 5.1.14 Test Setup

The EUT was configured in the SAC on a 1.5m high table. Exploratory measurements on the EUT were carried out to identify suspect frequencies and worst case orientations, see Section 5.1.15.

The measurement was then performed with an antenna to EUT separation distance of 3m.

The antenna was kept in the “cone of radiation” from the EUT and pointed at the area both in azimuth and elevation using the tilt mechanism on the antenna mast.

The results were maximised in orientation 0-360 degrees and height 1-4m.



**Figure 5 Test Setup for Final E-Field Measurements from 1GHz to 18GHz**

Note 1: With the EUT de-energized the ambient radio noise and signals met the 6dB peak detection requirement of ANSI C63.4-2010.

Note 2: There were no significant environmental temperature changes during the test duration and hence it was not considered necessary to consider any variation in cable loss.

Note 3: On all swept and final measurements made between 1GHz and 18GHz a 2.4GHz Microtronics BRM50702 notch filter was placed in the measurement chain between the antenna and pre-amplifier in order to prevent the artificial generation of harmonics within the pre-amplifier.

**5.1.15 Exploratory Radiated Emission Maximization**

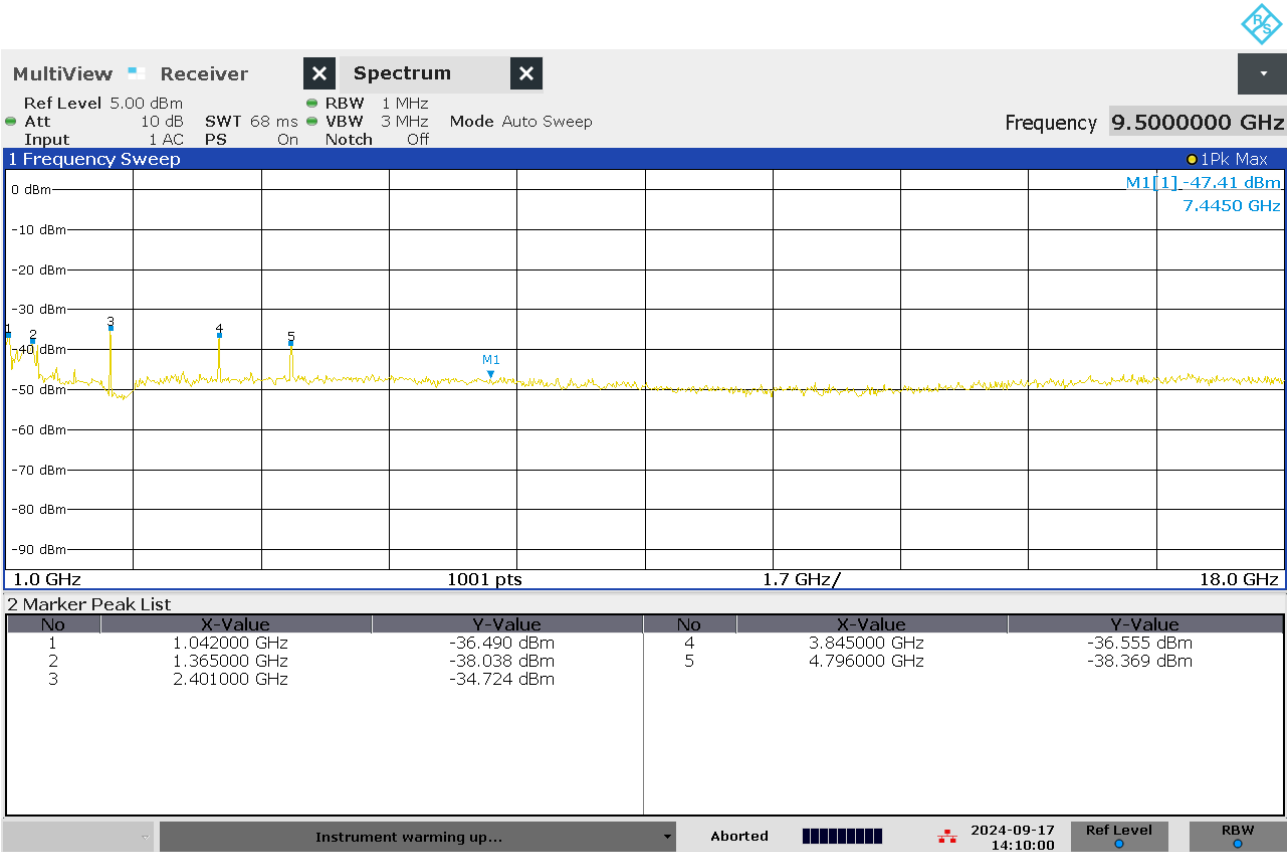
During exploratory testing, suspect emissions from the EUT were identified both in terms of the frequency and directionality. This was achieved by manually positioning the antenna close to the EUT and also by scanning it over all sides of the EUT whilst observing a spectral display. The typical distance between the surface of the EUT and the scanning antenna was circa 30cm.

Frequency (GHz)	Mode of operation	EUT face *	Emissions Angle (w.r.t. turntable)	Height	Polarization
1.025	Transmitting on channel 2440MHz	Front	0	1.5	V
1.042	Transmitting on channel 2402MHz & 2480MHz	Front	0	1.5	V
1.365	Transmitting on channel 2402MHz	Front	0	1.5	V
3.845	Transmitting on channel 2402MHz	Front	0	1.5	V
3.896	Transmitting on channel 2440MHz	Front	0	1.5	V
3.964	Transmitting on channel 2440MHz	Front	0	1.5	V
4.796	Transmitting on channel 2402MHz	Front	0	1.5	V
4.881	Transmitting on channel 2440MHz	Front	0	1.5	V
4.966	Transmitting on channel 2440MHz	Front	0	1.5	H

**Table 2 Frequencies identified during Exploratory Radiated Emission maximization**

Note 1: The front face of the EUT is deemed to be 0°, which is then turned in a clockwise direction through 360°.

Note 2: With no emissions observed above 5GHz during the exploratory investigation, final measurements were performed up to 8GHz only.

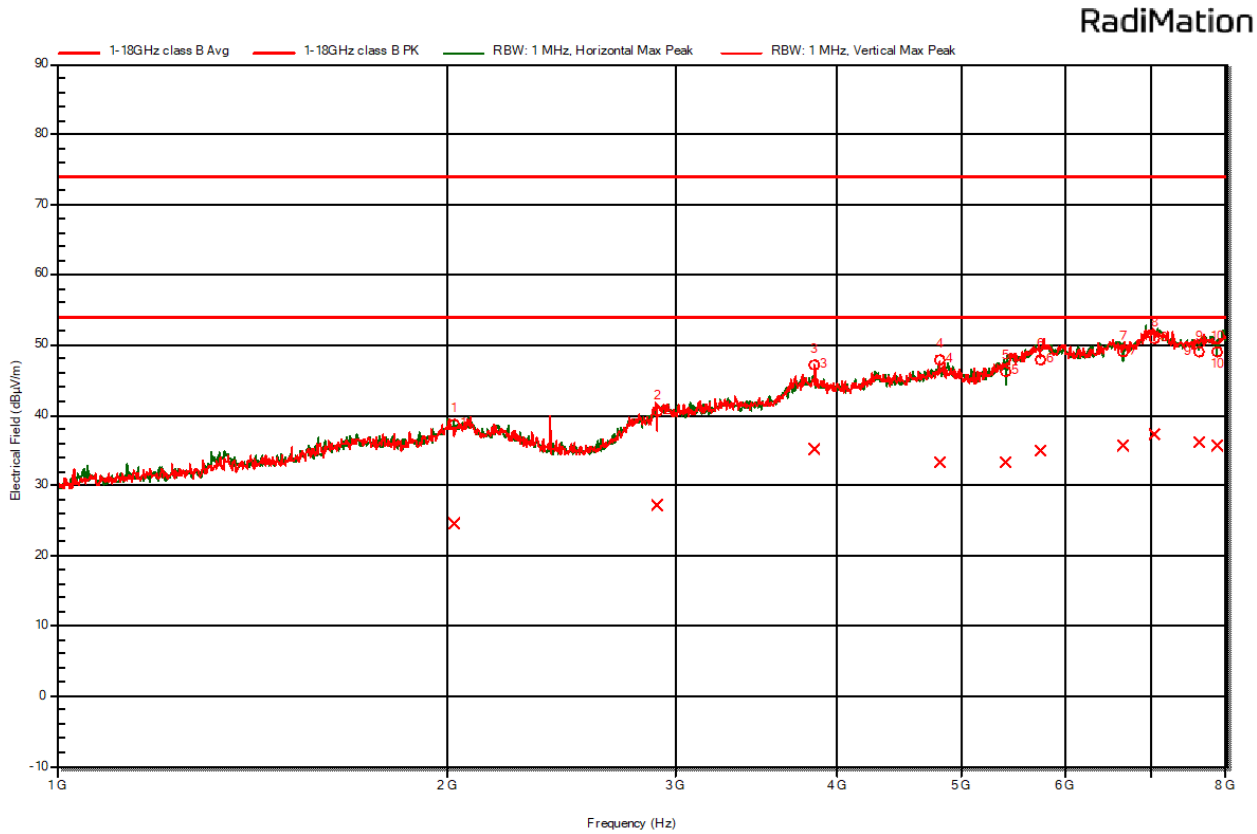


02:10:00 PM 09/17/2024

Figure 6 – Manual investigation – Operating on BT channel 2480MHz

### 5.1.16 Electric field emissions, 1GHz to 18GHz

The equipment under test was pre-scanned using peak detection when operating on all three channels. Final measurements were performed with the equipment under test operating on 2402MHz



**Figure 7 Electric field emissions Plot, 1GHz to 8GHz. Operation on 2402MHz**

Frequency GHz	Average dBµV/m	Average Limit dBµV/m	Average Difference dB	Average Status	Angle degrees	Height m	Polarization
2.029	24.6	54	-29.4	Pass	10	2.5	Vertical
2.912	27.2	54	-26.8	Pass	190	3.1	Vertical
3.843	35.2	54	-18.8	Pass	90	2.0	Vertical
4.804	33.3	54	-20.7	Pass	50	3.5	Vertical
5.410	33.3	54	-20.7	Pass	255	3.6	Horizontal
5.741	35.1	54	-19.0	Pass	355	2.8	Vertical
6.665	35.6	54	-18.4	Pass	350	3.0	Horizontal
7.035	37.4	54	-16.6	Pass	40	3.2	Vertical
7.631	36.2	54	-17.8	Pass	25	3.6	Horizontal
7.870	35.7	54	-18.3	Pass	75	3.4	Horizontal

**Table 3 Electric Field Emissions Peaks, 1GHz to 8GHz – Operation on 2440MHz**



RadiMation

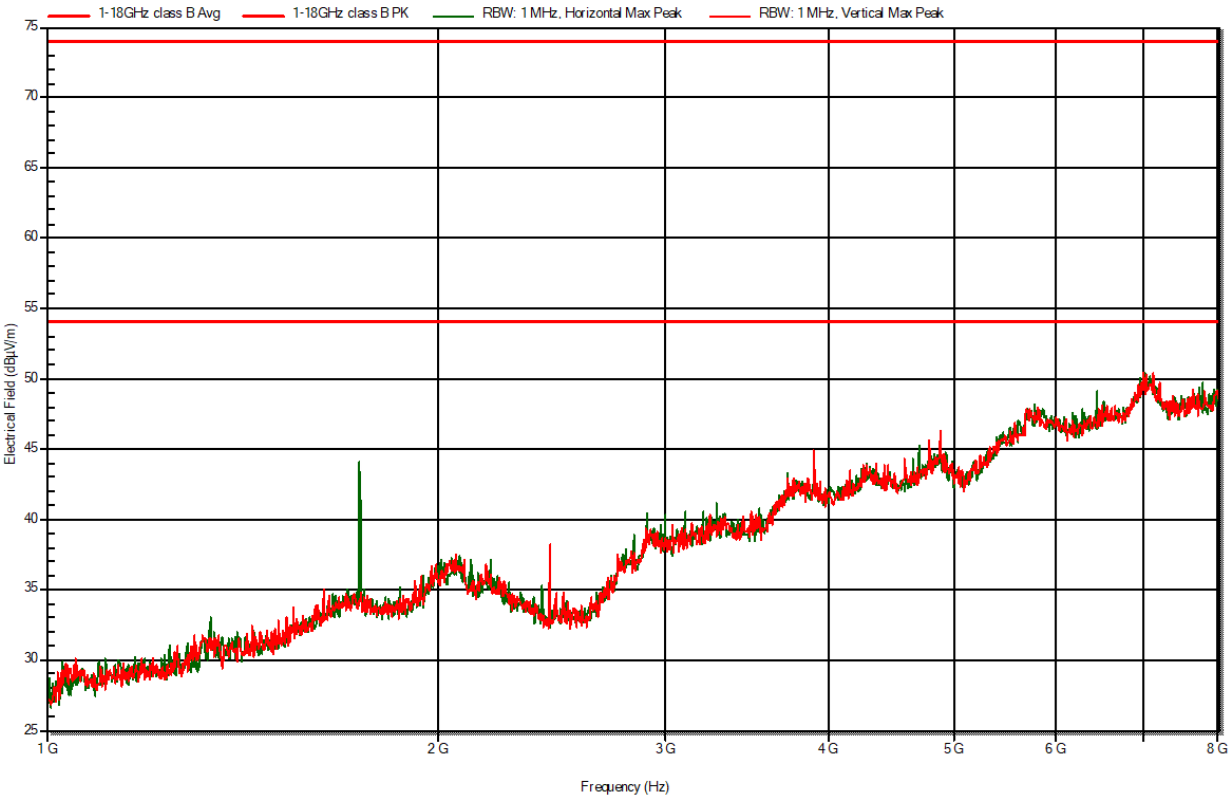


Figure 8 Electric field emissions Plot, 1GHz to 8GHz, Operation on 2440MHz - Peak detector scan

RadiMation

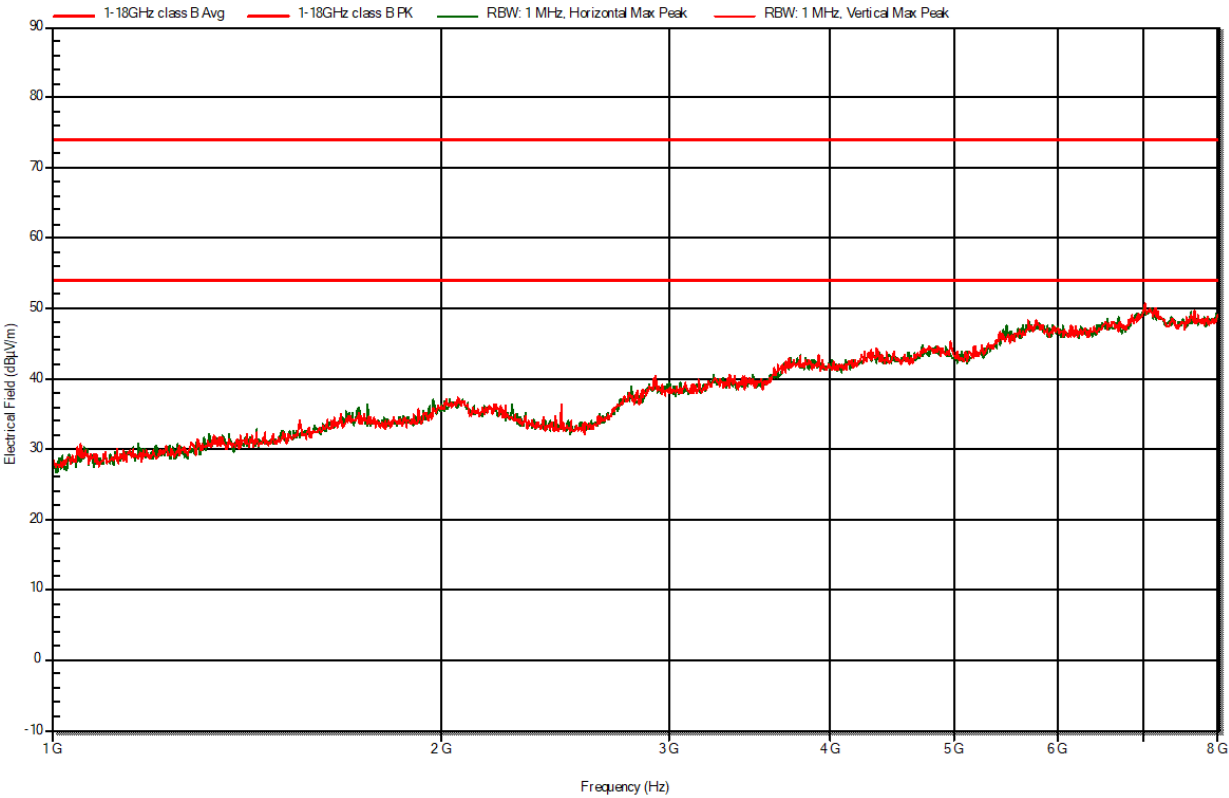


Figure 9 Electric field emissions Plot, 1GHz to 8GHz, Operation on 2480MHz - Peak detector scan

#### 5.1.17 Example field strength calculation

The total average corrections are shown in the above table. This correction figure consists of Preamplifier gain (PG), Antenna factor (AF); and Cable loss (CL), and where necessary distance extrapolation factor (dB).

Field strength (FS) is calculated as follows:

$$\text{FS (dB}\mu\text{V/m)} = \text{Indicated Signal Level (dB}\mu\text{V)} - \text{PG (dB)} + \text{AF (dB)} + \text{CL (dB)}$$

#### 5.1.18 Sample Data

From Figure 7 and table 3, The Average level at 7.870GHz is calculated as follows:

$$\text{FS (dB}\mu\text{V/m)} = 44.9(\text{dB}\mu\text{V}) - 54.4(\text{dB}) + 39.0(\text{dB/m}) + 6.2(\text{dB}) = 35.7\text{dB}\mu\text{V/m}$$

**Radiated Emissions (18GHz to 25GHz)****5.1.19 Limits**

Frequency (GHz)	Limit (dB $\mu$ V/m)	Limit (dB $\mu$ V/m)
	Peak	Average
18-25	74.0	54.0

**5.1.20 Receiver Settings**

Receiver Parameters	Setting
Detector Function	Average and Peak
Start Frequency	18GHz
Stop Frequency	25GHz
Resolution Bandwidth	1MHz
Video Bandwidth	Auto

**5.1.21 Emissions measurements****5.1.22 Date of Test**17<sup>th</sup> September 2024**5.1.23 Test Area**

LAB 1 (SAC)

**5.1.24 Tested by**

L Trickett

**5.1.25 Test Setup**

This is the same as for the 1-18GHz range for final measurements, except with a measurement distance of 1m.

### 5.1.26 Exploratory Radiated Emission Maximization

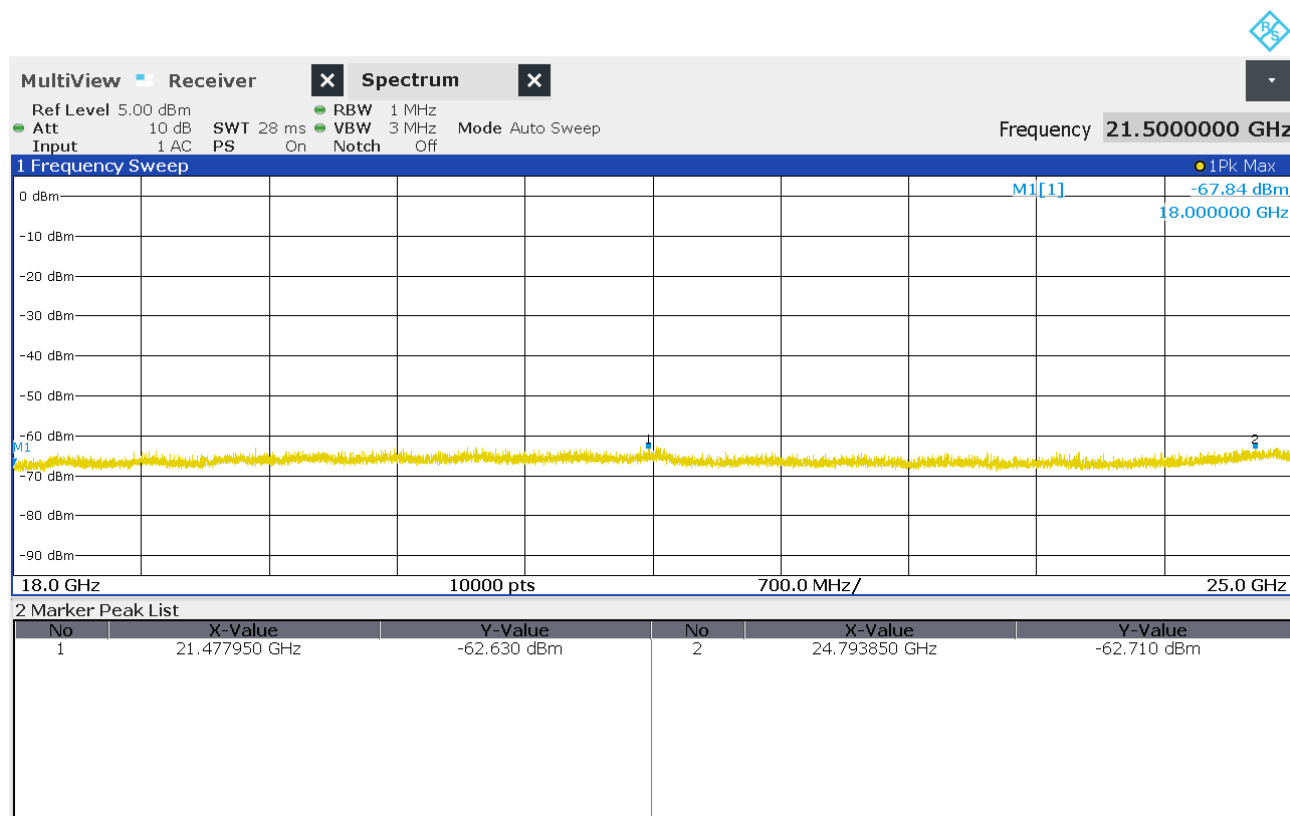
During exploratory testing, suspect emissions from the EUT were identified both in terms of the frequency and directionality. This was achieved by manually positioning the antenna close to the EUT and also by scanning it over all sides of the EUT whilst observing a spectral display. The typical distance between the surface of the EUT and the scanning antenna was circa 30cm.

Frequency (GHz)	Mode of operation	EUT face *	Emissions Angle (w.r.t. turntable)	Height	Polarization
-	Tx on channels 2402MHz, 2440MHz and 2480MHz.	-	-	-	-

**Table 4 Frequencies identified during Exploratory Radiated Emission maximization**

Note 1: The front face of the EUT is deemed to be 0°, which is then turned in a clockwise direction through 360°.

Note 2: No emissions were identified for further investigation above 18GHz.



**Figure 10 – Manual investigation – Operating on BT channel 2402MHz**

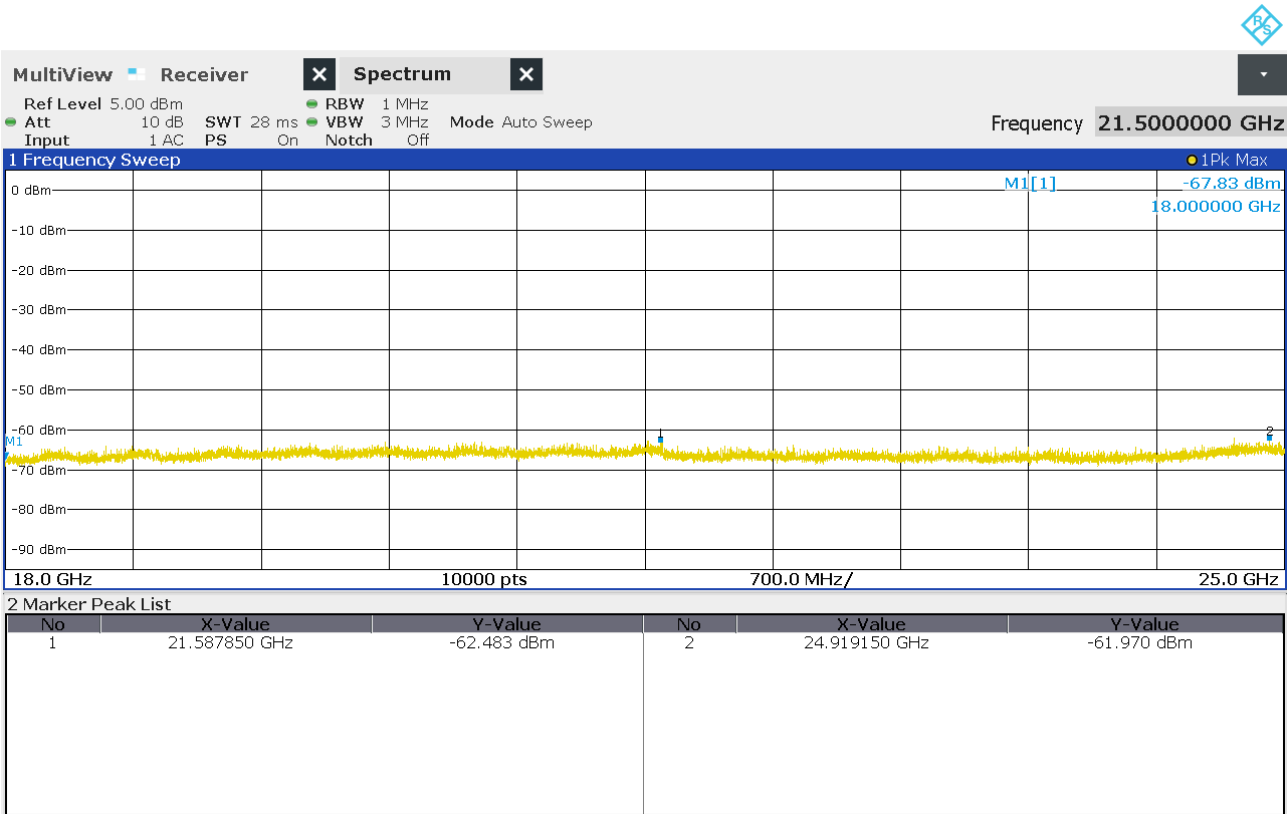


Figure 11 – Manual investigation – Operating on BT channel 2440MHz

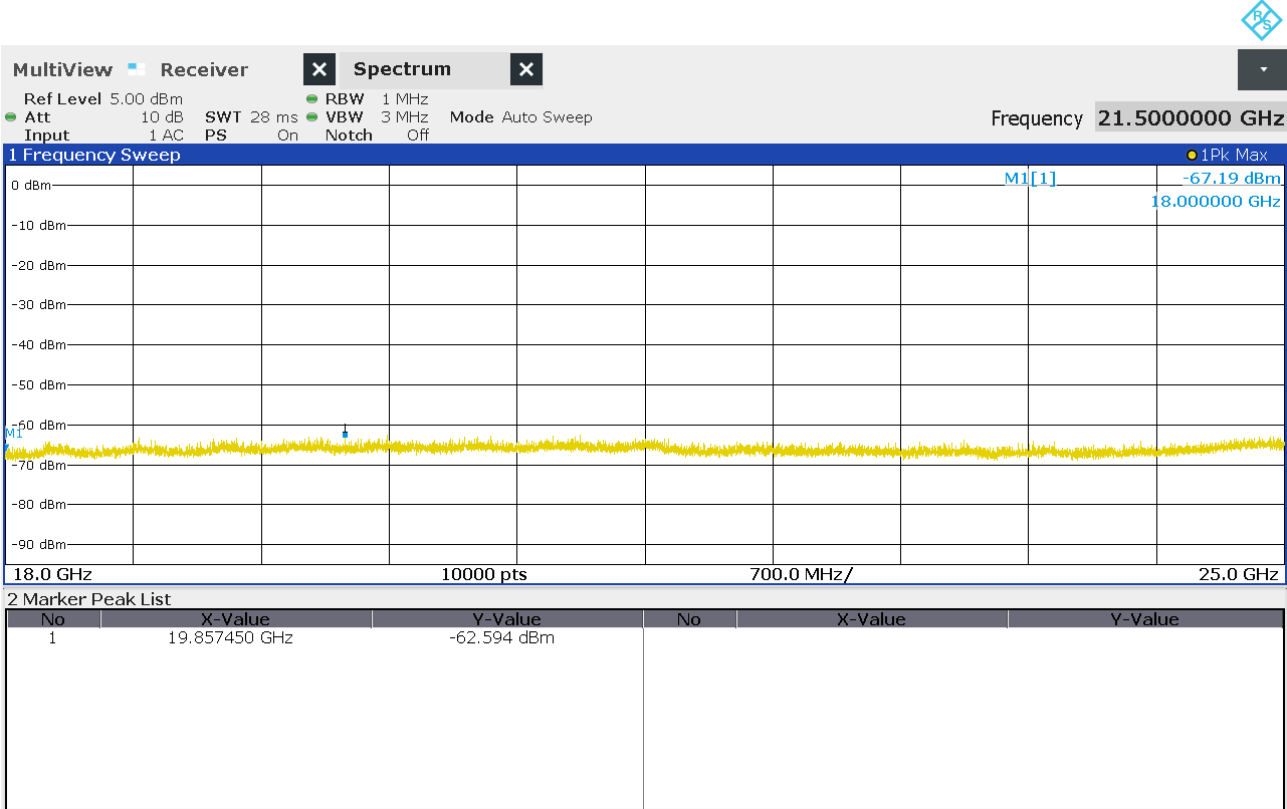


Figure 12 – Manual investigation – Operating on BT channel 2480MHz

**Conducted Spurious Emissions 30MHz to 25GHz****5.1.27 Limits**

Frequency (MHz)	Limit, 47CFR 15.247(d)
	Peak
30 – 25000	-20dBc

Spectrum analyser settings as specified by ANSI C63.10-2013 Clause 11.11.2

Receiver Parameters	Setting
Detector Function	Peak
Start Frequency	30MHz
Stop Frequency	25000MHz
Resolution Bandwidth	100kHz
Video Bandwidth	300kHz
Sweep rate	Auto couple
Trace mode	Max hold

**5.1.28 Emissions measurements****5.1.29 Date of Test**

16<sup>th</sup> September 2024

**5.1.30 Test Area**

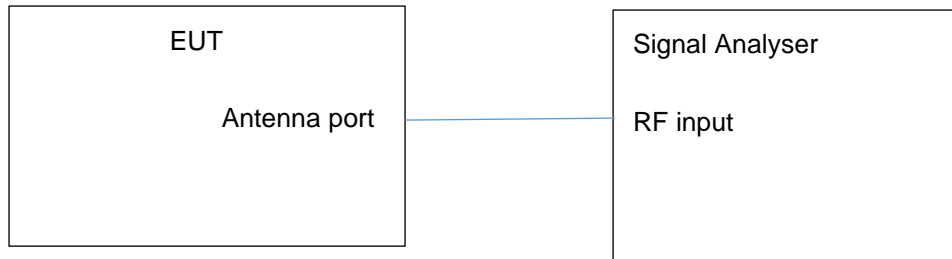
LAB 8

**5.1.31 Tested by**

L Trickett

### 5.1.32 Test Setup

The antenna port was connected directly to the signal analyser.



### 5.1.33 Test Results

The results of the conducted spurious emissions are stated below and by the signal analyser images.

All disturbances detected were > 20dB below the carrier.

Date: 14<sup>th</sup> October 2024

Report Number: C15656TR3

## 5.1.34 Antenna port conducted emissions, 30MHz to 25GHz

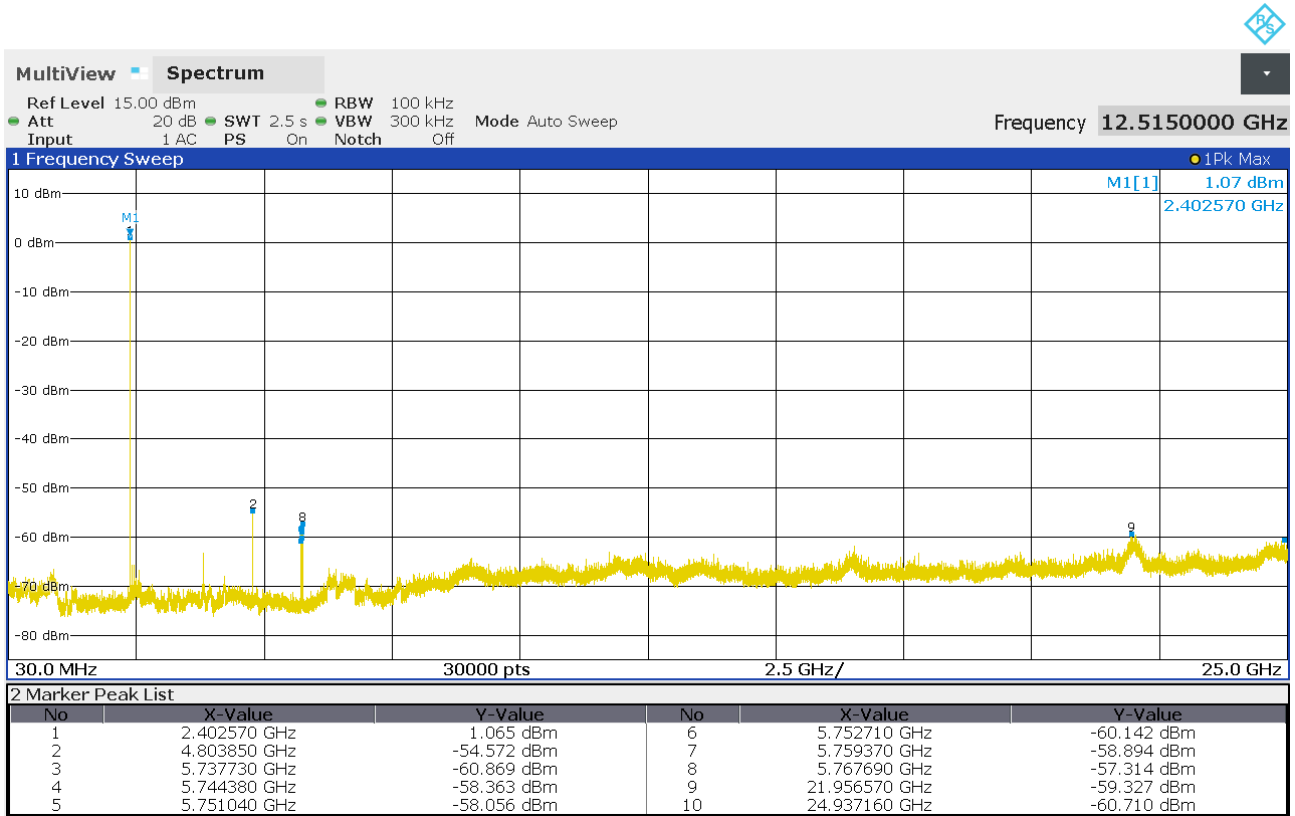


Figure 13 Conducted emissions 30MHz to 25GHz. Operation on channel 2402MHz.

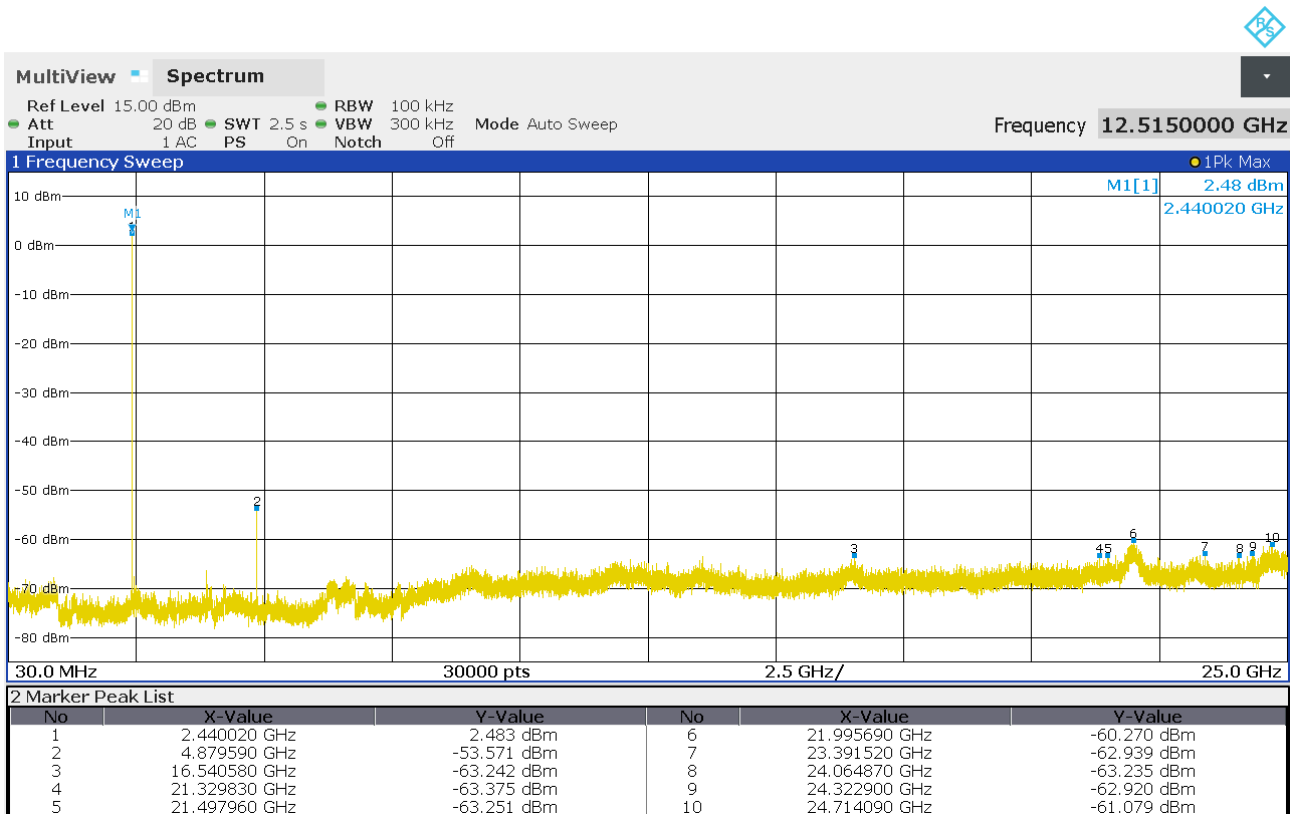


Figure 14 Conducted emissions 30MHz to 25GHz. Operation on channel 2440MHz.





Figure 15 Conducted emissions 30MHz to 25GHz. Operation on channel 2480MHz.

## Section 6 20dB Bandwidth and 99% Occupied Bandwidth

### Test Specification

FCC Rule Part	46CFR 15.247 (a)(1)
Standard	ANSI C63.10:2013
Measurement Uncertainty Frequency tests	$\pm 9 \times 10^{-8}$

### Procedure and Test Software Version

### Conducted Tests

ANSi C63.10-2013 Clause reference:	7.8.7
Test software	N/A

Frequency (MHz)	Limit, 47CFR 15.247(a)(1) 20dB bandwidth
	Peak
2400MHz to 2483.5MHz	Less than or equal to 1.5 times the channel separation, provided the systems operate with an output power no greater than 125 mW.

Spectrum analyser settings as specified by ANSI C63.10-2013 Clause 6.9.2

Receiver Parameters	Setting
Detector Function	Peak
Span	3MHz
Resolution Bandwidth	20kHz
Video Bandwidth	100kHz
Sweep rate	Auto couple
Trace mode	Max hold

6.1.1 Emissions measurements

6.1.2 Date of Test

16<sup>th</sup> September 2024

6.1.3 Test Area

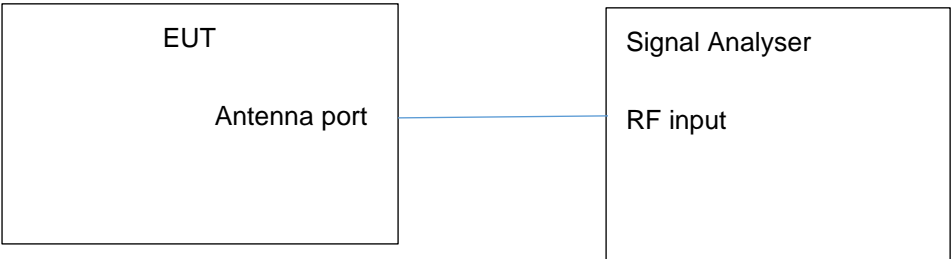
LAB 8

6.1.4 Tested by

L Trickett

6.1.5 Test Setup

The antenna port was connected directly to the signal analyser.



6.1.6 Test Results

The results of the 20dB bandwidth measurements are stated in the table below and by the signal analyser images.

Channel (MHz)	99% Occupied Bandwidth (MHz)	Measured 20dB bandwidth (MHz)	Limit (MHz)	Figure	Result
2402.0	1.172	1.273	1.5	16 & 19	Pass
2440.0	1.170	1.273	1.5	17 & 20	Pass
2480.0	1.160	1.272	1.5	18 & 21	Pass

Table 5 Bandwidth Measurements

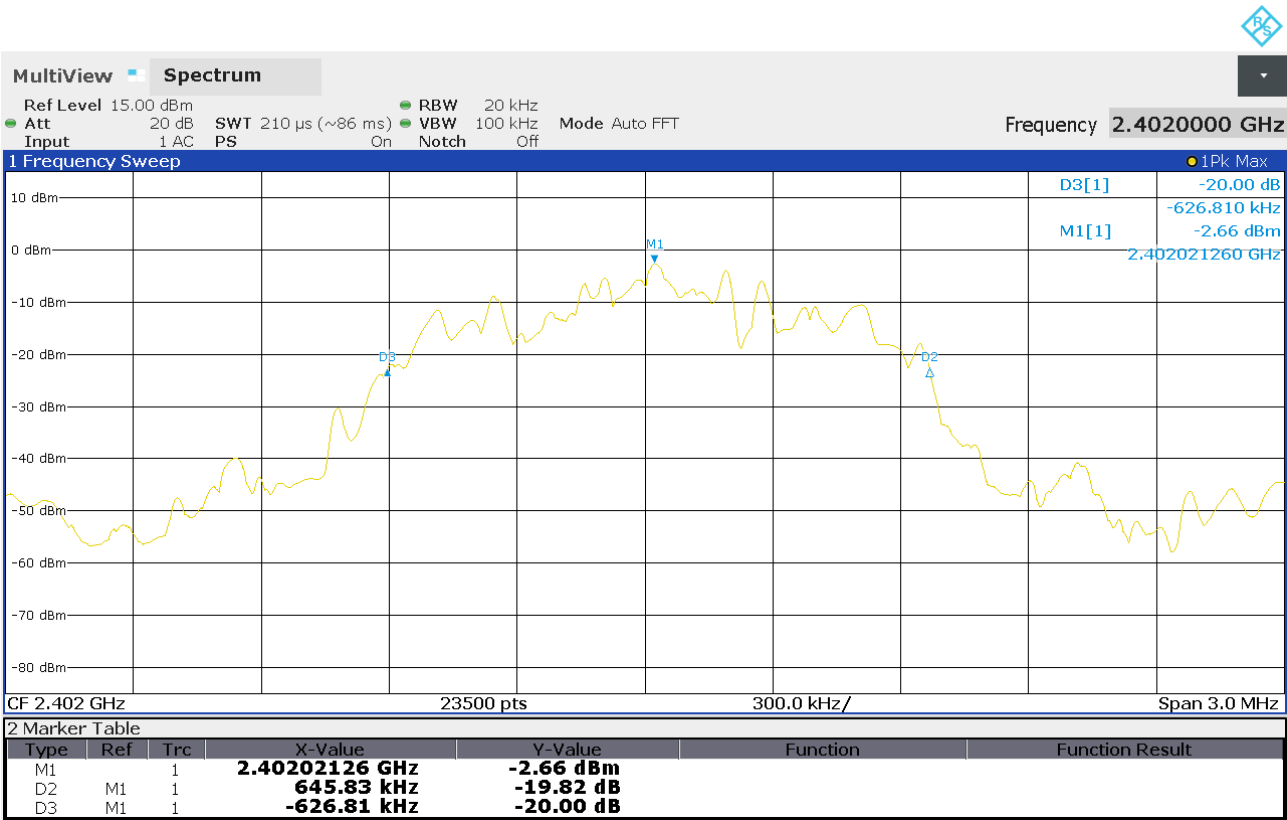


Figure 16 Bandwidth at 20dB Point. Operation on channel 2402MHz



Figure 17 Bandwidth at 20dB Point. Operation on channel 2440MHz



Figure 18 Bandwidth at 20dB Point. Operation on channel 2480MHz

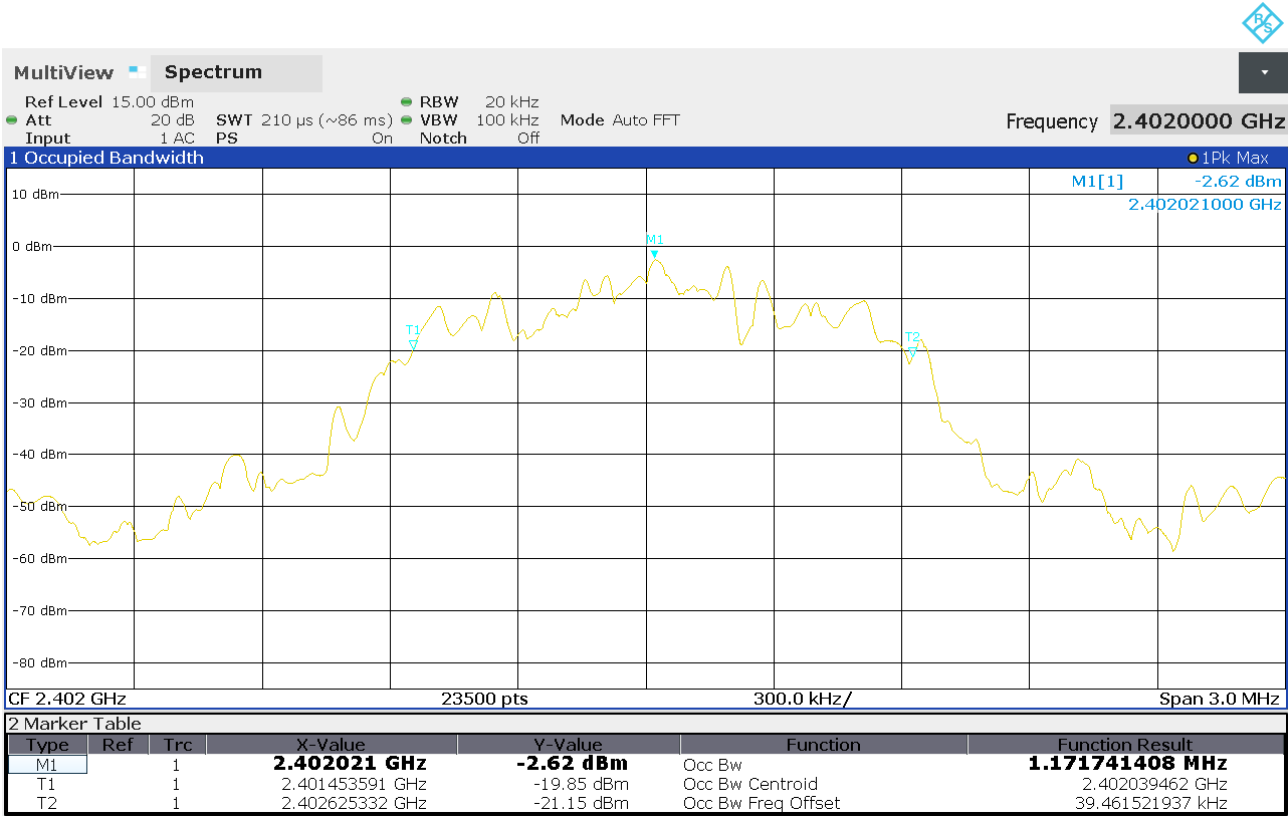


Figure 19 99% Occupied Bandwidth. Operation on channel 2402MHz



Figure 20 99% Occupied Bandwidth. Operation on channel 2440MHz

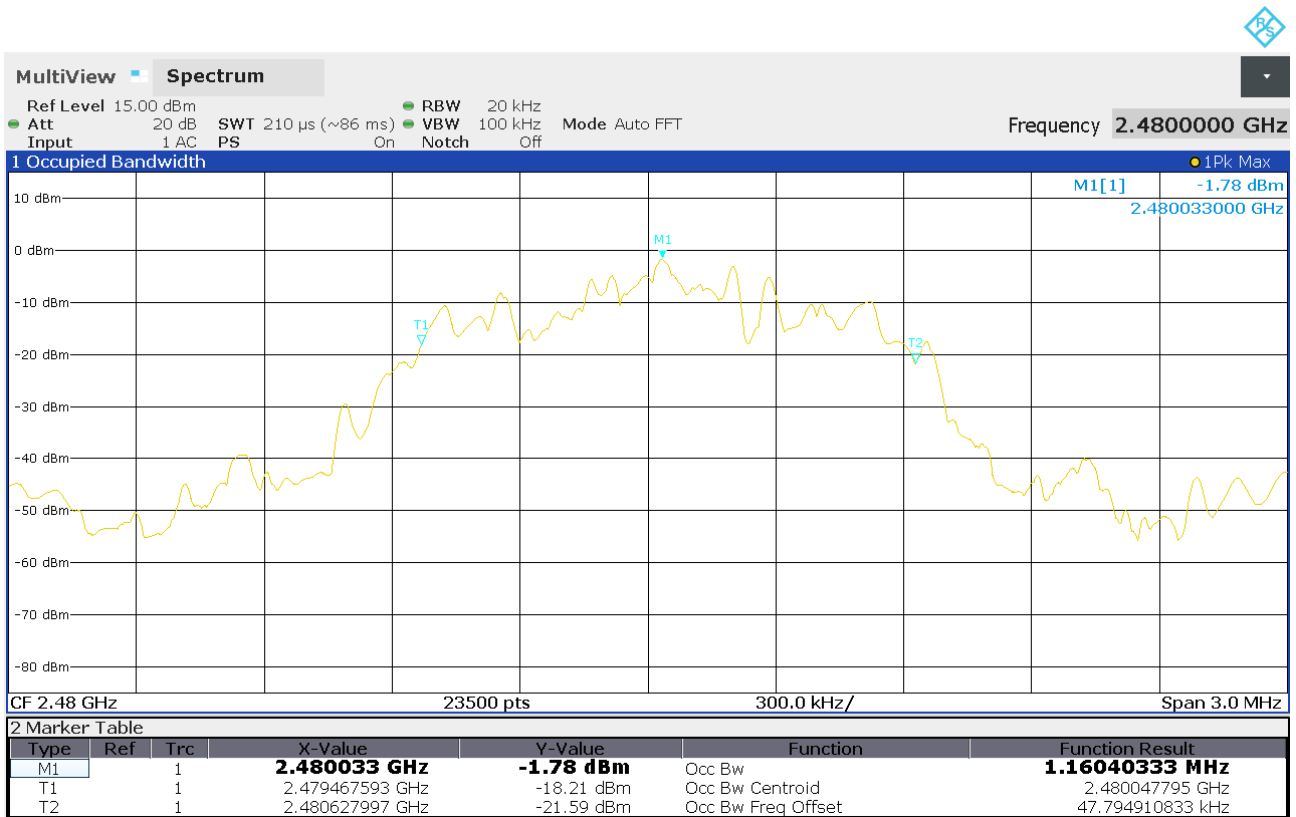


Figure 21 99% Occupied Bandwidth. Operation on channel 2480MHz

## Section 7 Peak Output Power

### Test Specification

FCC Rule Part	46CFR 15.247 (b)(1)
Standard	ANSI C63.10:2013
Measurement Uncertainty Conducted Power tests	±1.4dB

### Procedure and Test Software Version

#### Conducted Tests

ANSi C63.10-2013 Clause reference:	7.8.5
Test software	N/A

Frequency (MHz)	Limit, 47CFR 15.247(b)(1)
	Peak
2400MHz to 2483.5MHz	0.125 watt

Spectrum analyser settings as specified by ANSI C63.10-2013 Clause 7.8.5

Receiver Parameters	Setting
Detector Function	Peak
Span	7MHz
Resolution Bandwidth	2MHz
Video Bandwidth	5MHz
Sweep rate	Auto couple
Trace mode	Max hold

7.1.1 Emissions measurements

7.1.2 Date of Test

16<sup>th</sup> September 2024

7.1.3 Test Area

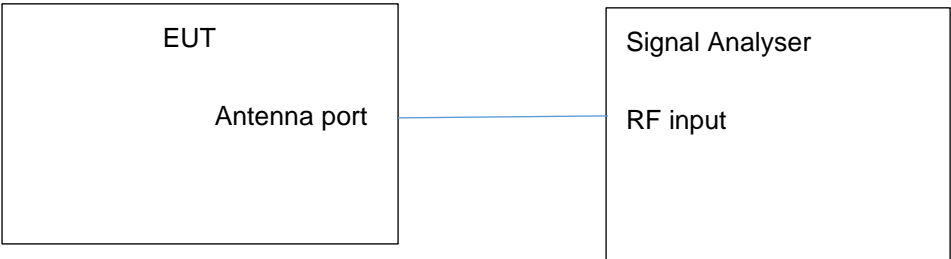
LAB 8

7.1.4 Tested by

L Trickett

7.1.5 Test Setup

The antenna port was connected directly to the signal analyser.





### 7.1.6 Test Result

The results of the peak output power measurements are stated in the table below and by the signal analyser images.

Channel (MHz)	Peak Power (dBm)	Peak Power (Watts)	Limit (Watts)	Figure
2402	4.29	0.0027	0.125	22
2440	4.97	0.0031	0.125	23
2480	5.06	0.0032	0.125	24

**Table 6 Peak Output Power Measurements**

The MAX antenna gain is 2.0dBi, MAX EIRP=MAX peak power \*MAX antenna gain=5.06 + 2.0 = 7.06 dBm, The Max EIRP is 7.06 dBm (0.0051W) and does not exceed 4W, which meets the EIRP requirement of RSS-247 section 5.4.

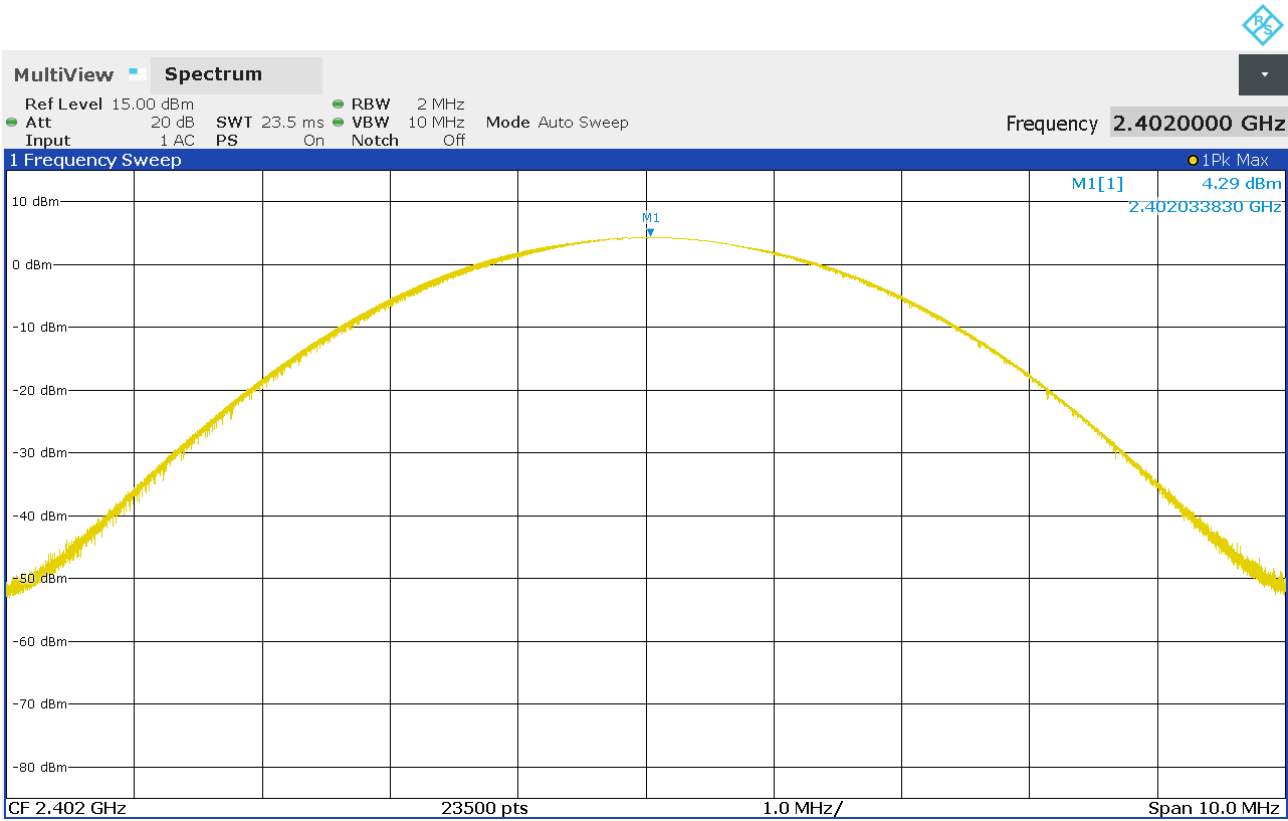


Figure 22 Peak output power, Operation on channel 2402MHz

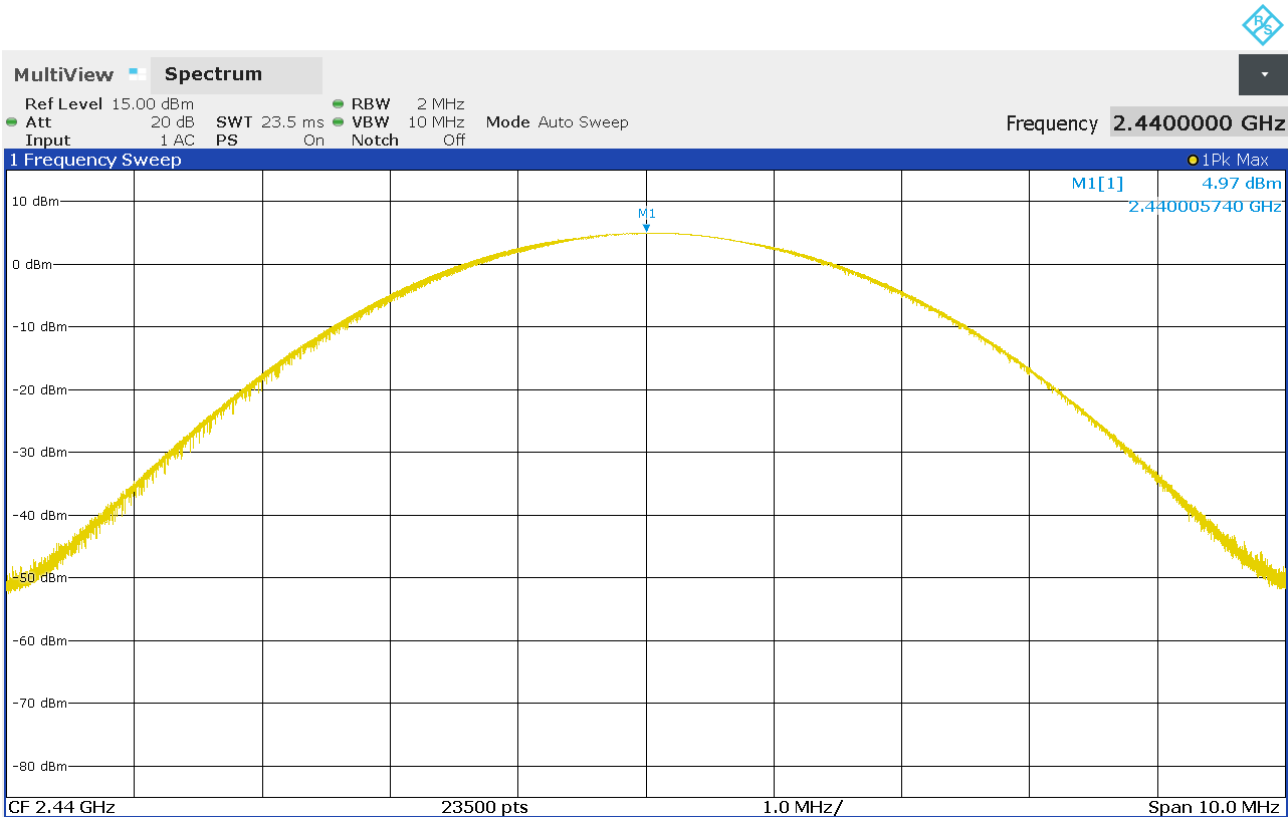


Figure 23 Peak output power, Operation on channel 2440MHz

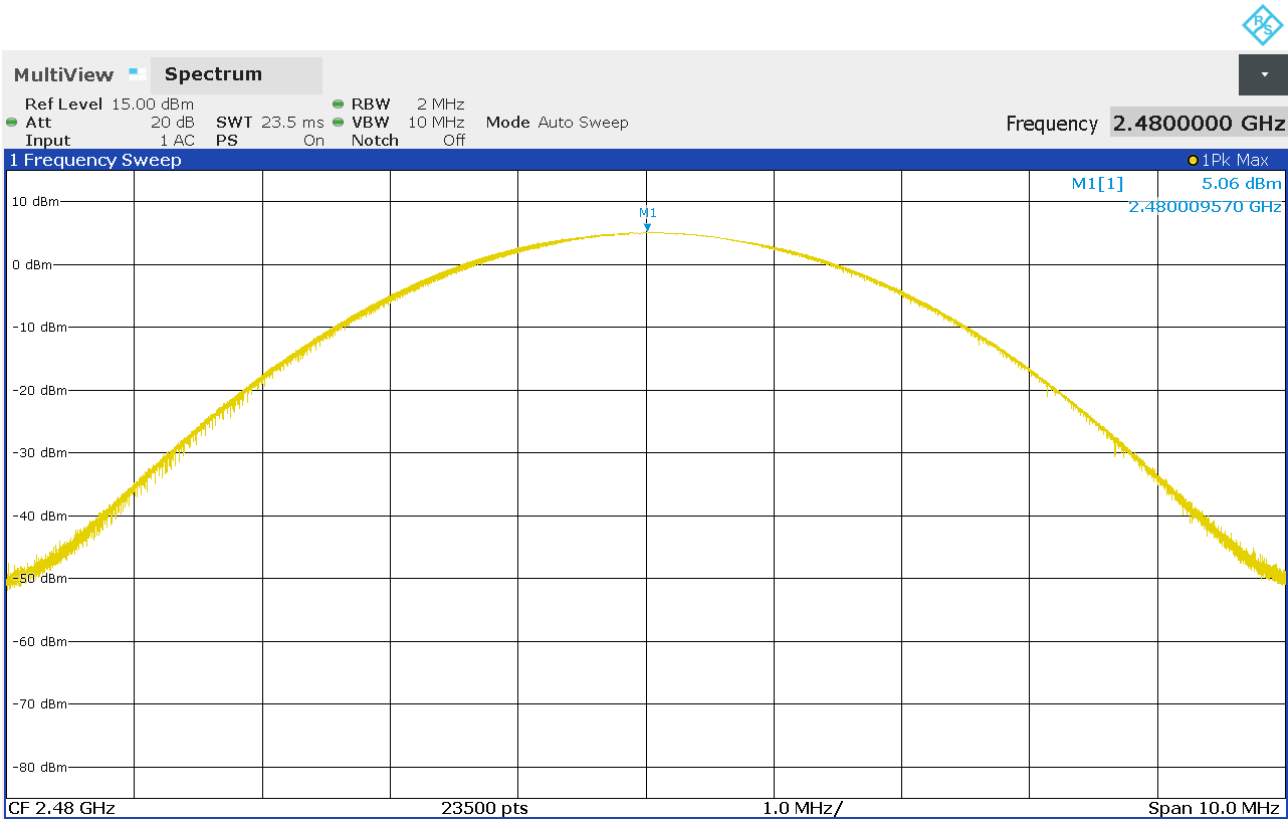


Figure 24 Peak output power, Operation on channel 2480MHz

Section 8    Frequency Hopping Spread Spectrum Requirements

Number of Hopping Frequencies

FCC Rule Part	47CFR15.247(a)(1)(iii)
Standard	ANSI C63.10:2013

Frequency hopping systems in the 2400-2483.5MHz band shall use at least 15 channels.

The procedure described in ANSI C63.10-2013 Clause 7.8.3 was followed.

8.1.1    Date of Test

16<sup>th</sup> September 2024

8.1.2    Test Area

LAB 8

8.1.3    Tested by

L Trickett

8.1.4    Test Setup

The antenna port was connected directly to the signal analyser.



### 8.1.5 Test Results

The results show that 79 hopping channels were utilised. The analyser screen displays show the 79 hopping channels, split into two subranges:

Overall requirement of at least 15 channels was met.

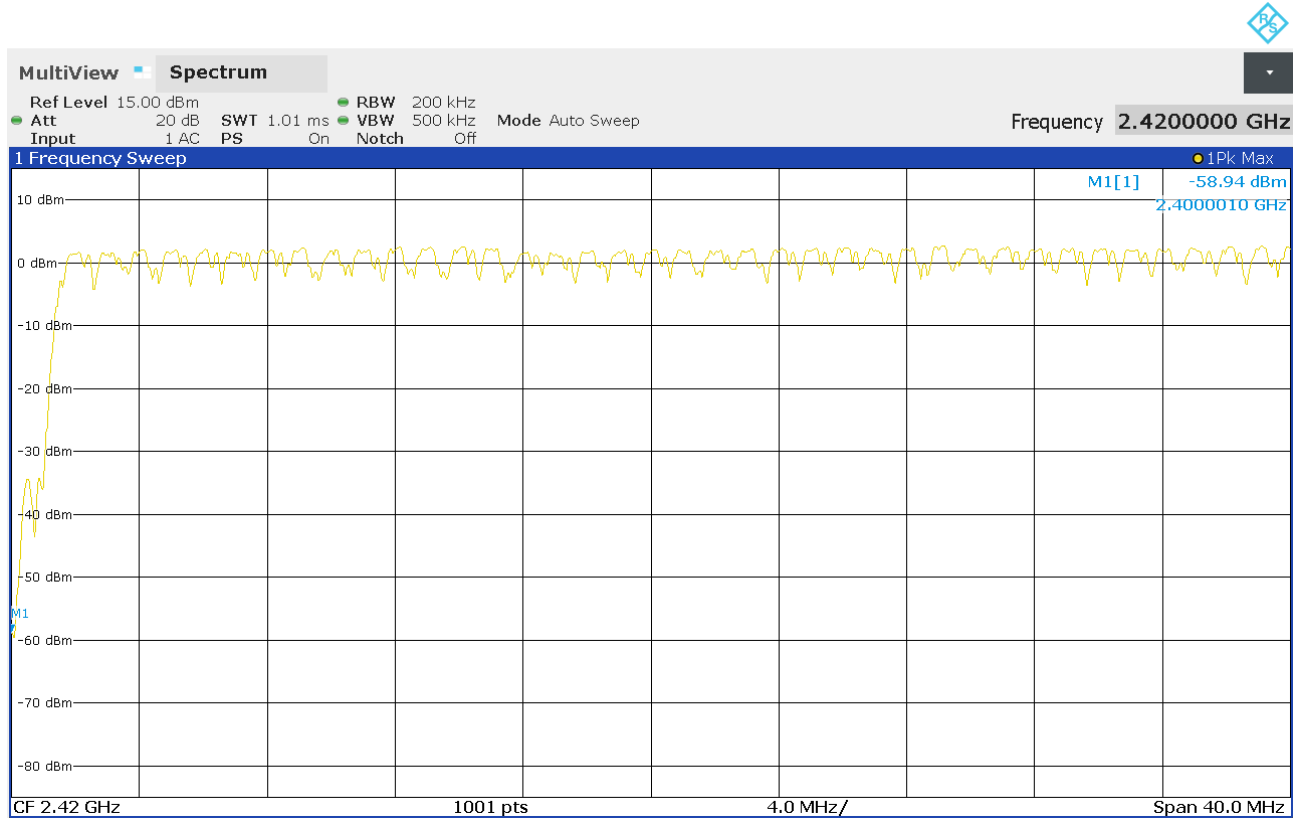


Figure 25 Number of hopping frequencies (1/2)



Figure 26 Number of hopping frequencies (2/2)

Frequency Hopping Channel Separation

FCC Rule Part	47CFR15.247(a)(1)
Standard	ANSI C63.10:2013
Measurement Uncertainty Frequency tests	$\pm 9 \times 10^{-8}$

8.1.6 Date of Test

16<sup>th</sup> September 2024

8.1.7 Test Area

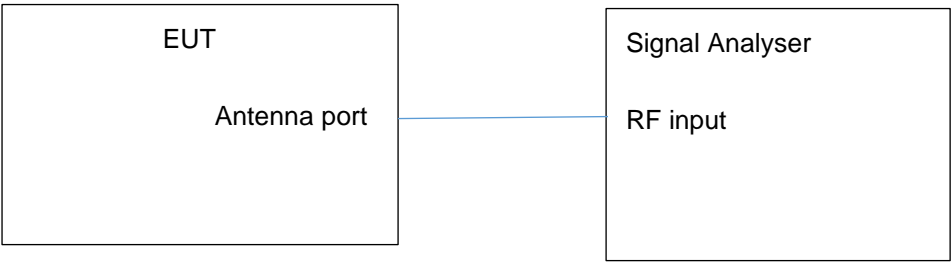
LAB 8

8.1.8 Tested by

L Trickett

8.1.9 Test Setup

The antenna port was connected directly to the signal analyser.



8.1.10 Requirement 47CFR15.247(a)(1)

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.

As the output power was measured to be less than 125 mW and since two thirds of the measured 20dB bandwidth is greater than 25kHz, the carrier frequency separation shall be > two thirds of the measured 20dB bandwidth.

8.1.11 Procedure

The procedure described in ANSI C63.10-2013 Clause 7.8.2 was followed.

8.1.12 Test Results

Between any two adjacent channels the carrier separation was measured to be, compliant with the requirement.

Measured Separation (kHz)	Limit (kHz)	Result
996.5	>846.7	Pass

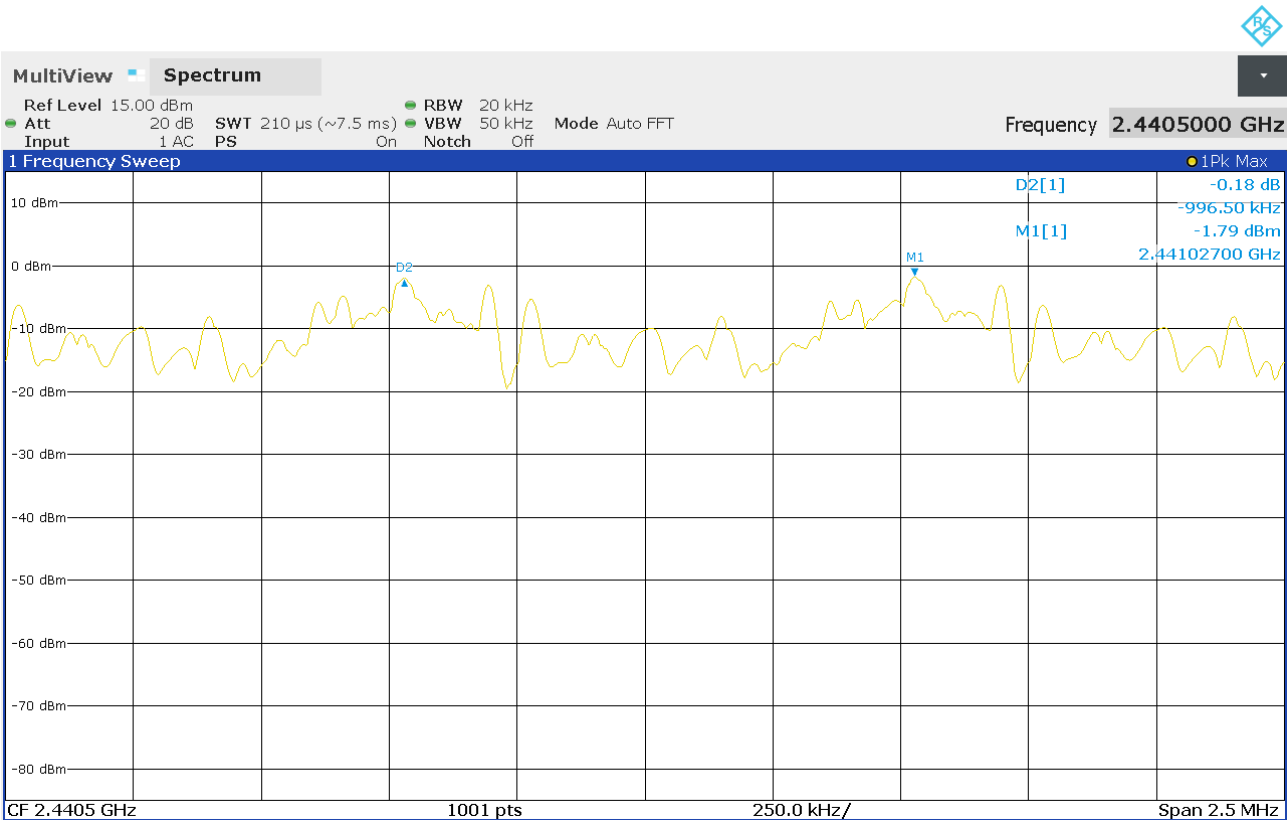


Figure 27 Carrier frequency separation

Hopping Channel Occupancy Time

FCC Rule Part	47CFR15.247(a)(1)(iii)
Standard	ANSI C63.10:2013

8.1.13 Date of Test

16<sup>th</sup> September 2024

8.1.14 Test Area

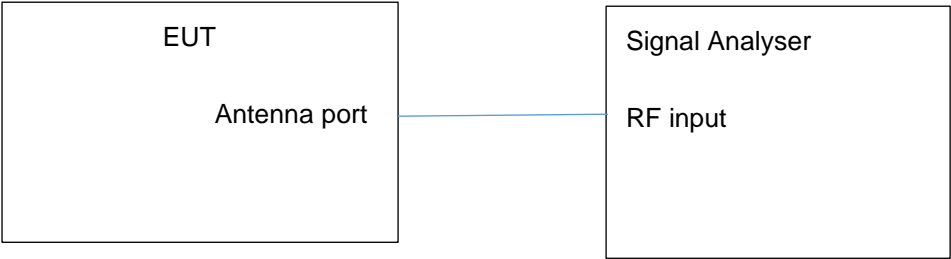
LAB 8

8.1.15 Tested by

L Trickett

8.1.16 Test Setup

The antenna port was connected directly to the signal analyser.



8.1.17 Requirement 47CFR15.247(a)(1)(iii)

The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed.



### 8.1.18 Procedure

The procedure described in ANSI C63.10-2013 Clause 7.8.4 was followed.

### 8.1.19 Test Results

Sweep time (s)	No of hops measured in sweep time	No of hopping channels used	Period specified by requirements	No of hops in period specified by requirements	Occupancy time (s)	Limit (s)	Average time of occupancy (s)
1	9	79	31.6	284.4	$3.92 \times 10^{-4}$	0.4	0.1115

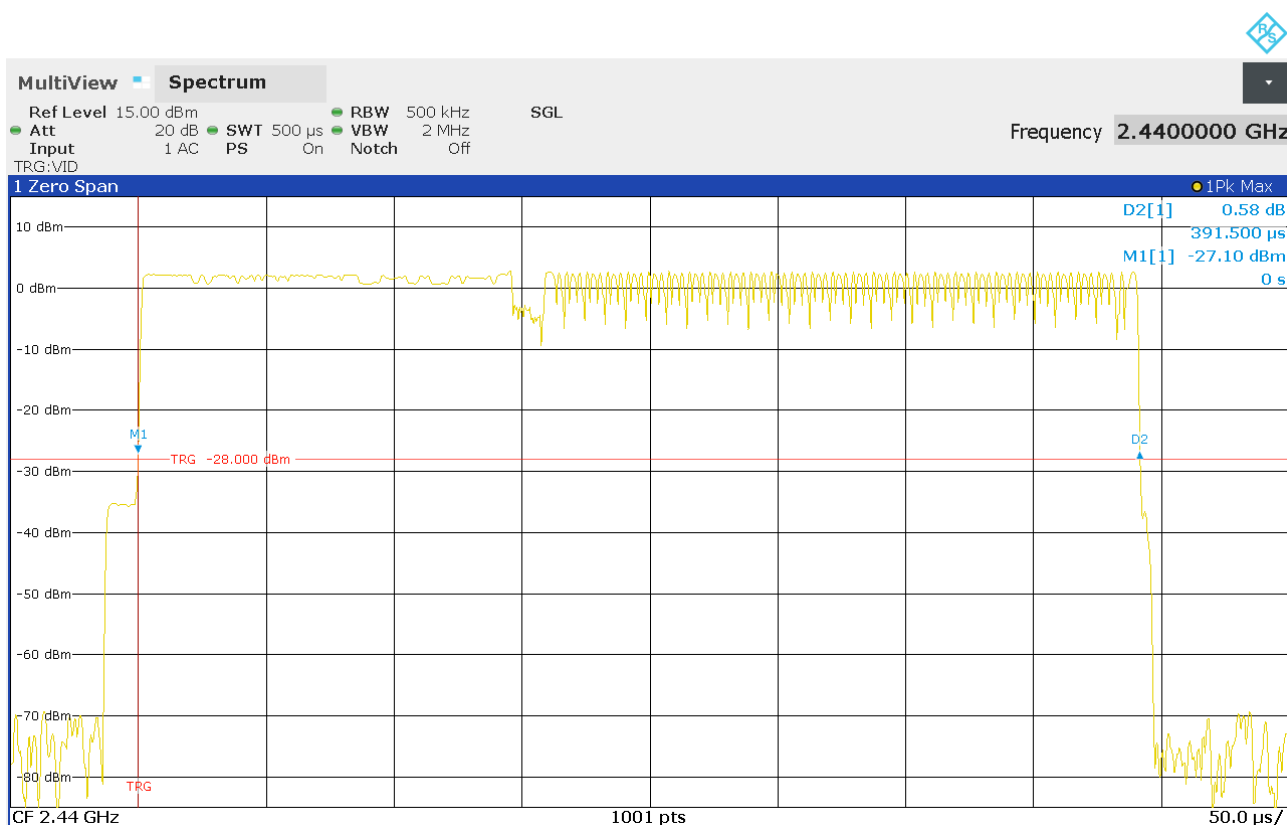


Figure 28 Transmit time per hop

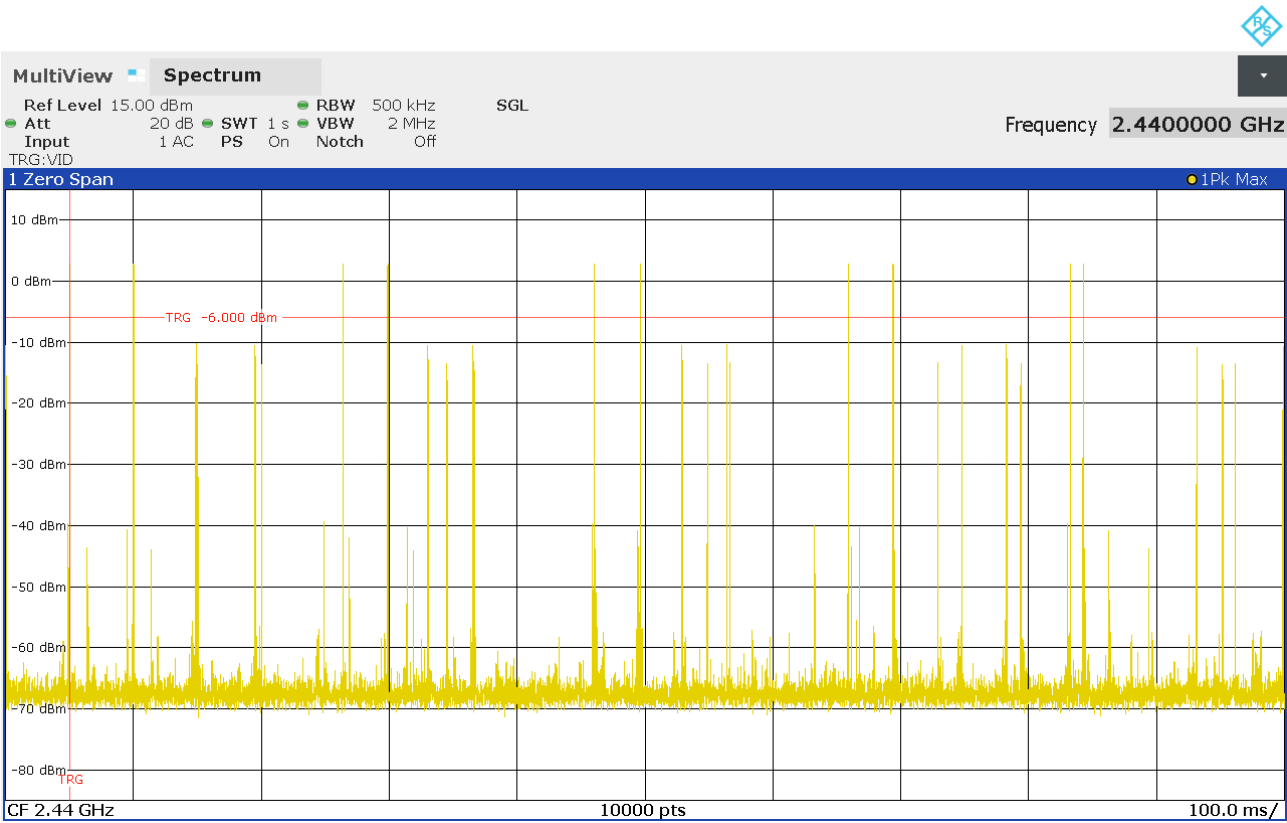


Figure 29 Number of Hops in specified period

## Section 9 Band Edge Compliance

### Test Specification

FCC Rule Part	46CFR 15.205 and 47CFR15.209
Standard	ANSI C63.10:2013
Measurement Uncertainty Radiated tests	The reported uncertainty of measurement $y \pm U$ , where expended uncertainty U is based on a standard uncertainty multiplied by a coverage factor of $k=2$ , providing a level of confidence of approximately 95% is $\pm 5.14\text{dB}$ for the frequency range from 1GHz to 6GHz

### Procedure and Test Software Version

#### Conducted Tests

ANSi C63.10-2013 Clause reference:	Clause 6.10.4 Authorised band-edge measurements
Test software	N/A

Frequency (MHz)	Limit, 47CFR 15.247(e)
	Peak
2400MHz to 2483.5MHz	Measured signal at the band edge must be below the radiated emission limits of 47CFR15.209

Spectrum analyser settings as specified by ANSI C63.10-2013 Clause 6.10.5 "Restricted band-edge measurements"

Receiver Parameters	Setting
Detector Function	Peak
Span	As necessary
Resolution Bandwidth	100kHz (Authorised band edge) 1MHz (Restricted band edge)
Video Bandwidth	3 x RBW
Sweep rate	Auto couple
Trace mode	Max hold

**9.1.1 Emissions measurements****9.1.2 Date of Test**

20<sup>th</sup> September 2024

**9.1.3 Test Area**

LAB 1

**9.1.4 Tested by**

L Trickett

**9.1.5 Test Setup**

The test setup was identical to radiated emissions testing 1-18GHz.

**9.1.6 Test Results**

Results are presented in two formats:

Tabular results of measurements at the band edges. Manual measurements were performed to measure the maximum value of signal at the band edge. The tabular data includes the following:

1. Polarity of the measurement antenna
2. Frequency at the band edge
3. Amplitude of signal at the input of the test receiver
4. Pre-amplifier gain
5. Cable loss
6. Antenna factor
7. Resultant Electric field strength = 3-4+5+6

Spectrum analyser screen displays are also included. Please note that the screen displays do not include losses or antenna factor.

**Tabular Data**

The following radiated measurements were made at the band edges:

**Upper band edge**

Polarity	frequency (MHz)	Amplitude (dBuV)	Preamp (dB)	Cable loss (dB)	AF(dB/m)	E (dBuV/m)	Limit (dBuV/m)	Margin (dB)
H	2483.5	62.1	54.3	4.1	30.6	42.5	74.0	31.5
V	2483.5	64.9	54.3	4.1	30.6	45.3	74.0	28.7

**Table 7 Operation on 2480MHz Channel, Peak detector measurements**

Polarity	frequency (MHz)	Amplitude (dBuV)	Preamp (dB)	Cable loss (dB)	AF(dB/m)	E (dBuV/m)	Limit (dBuV/m)	Margin (dB)
H	2483.5	45.3	54.3	4.1	30.6	25.7	54.0	28.3
V	2483.5	46.1	54.3	4.1	30.6	26.5	54.0	27.5

**Table 8 Operation on Channel 2480MHz, Average detector measurements****Lower band edge**

Polarity	frequency (MHz)	Amplitude (dBuV)	Preamp (dB)	Cable loss (dB)	AF(dB/m)	E (dBuV/m)	Limit (dBuV/m)	Margin (dB)
H	2400	74.4	54.2	4.0	30.0	54.2	74.0	19.8
V	2400	85.5	54.2	4.0	30.0	65.3	74.0	8.7

**Table 9 Operation on channel 2402MHz Peak detector measurements**

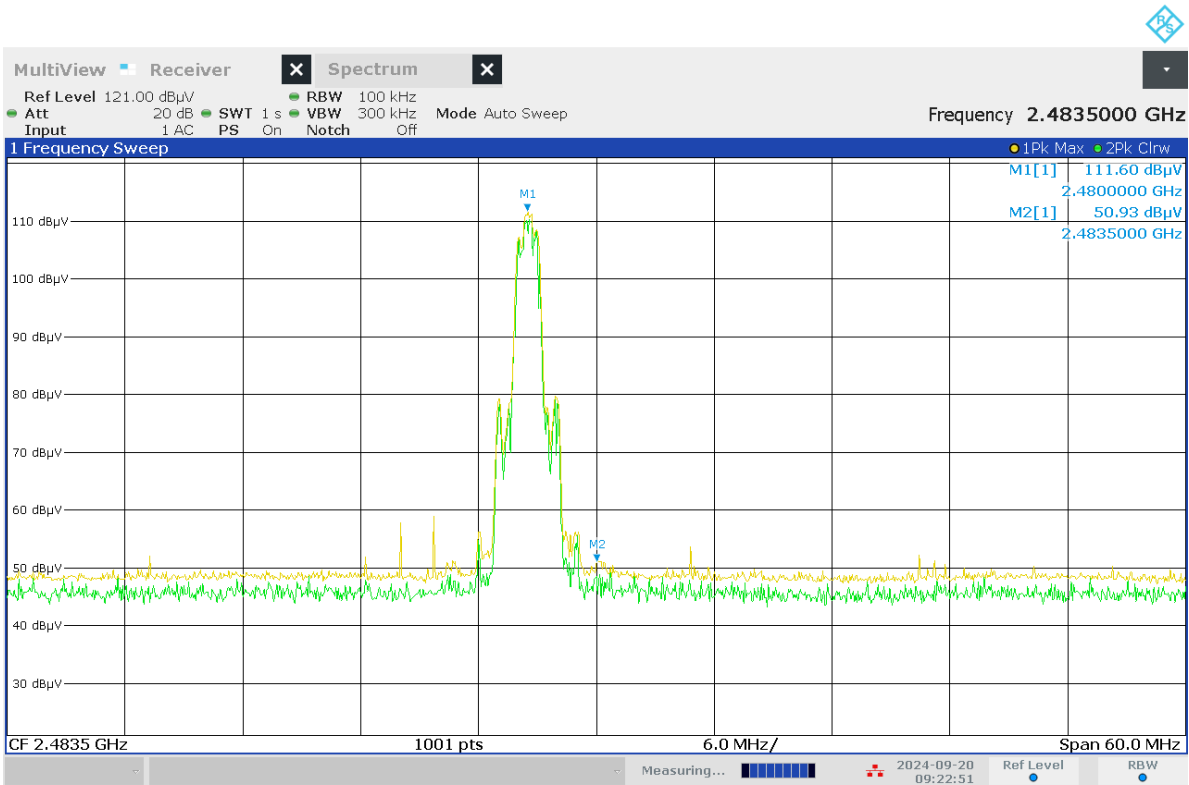
Polarity	frequency (MHz)	Amplitude (dBuV)	Preamp (dB)	Cable loss (dB)	AF(dB/m)	E (dBuV/m)	Limit (dBuV/m)	Margin (dB)
H	2400	48.9	54.2	4.0	30.0	28.7	54.0	25.3
V	2400	56.3	54.2	4.0	30.0	36.1	54.0	17.9

**Table 10 Operation on channel 2402MHz Average detector measurements**

Date: 14<sup>th</sup> October 2024

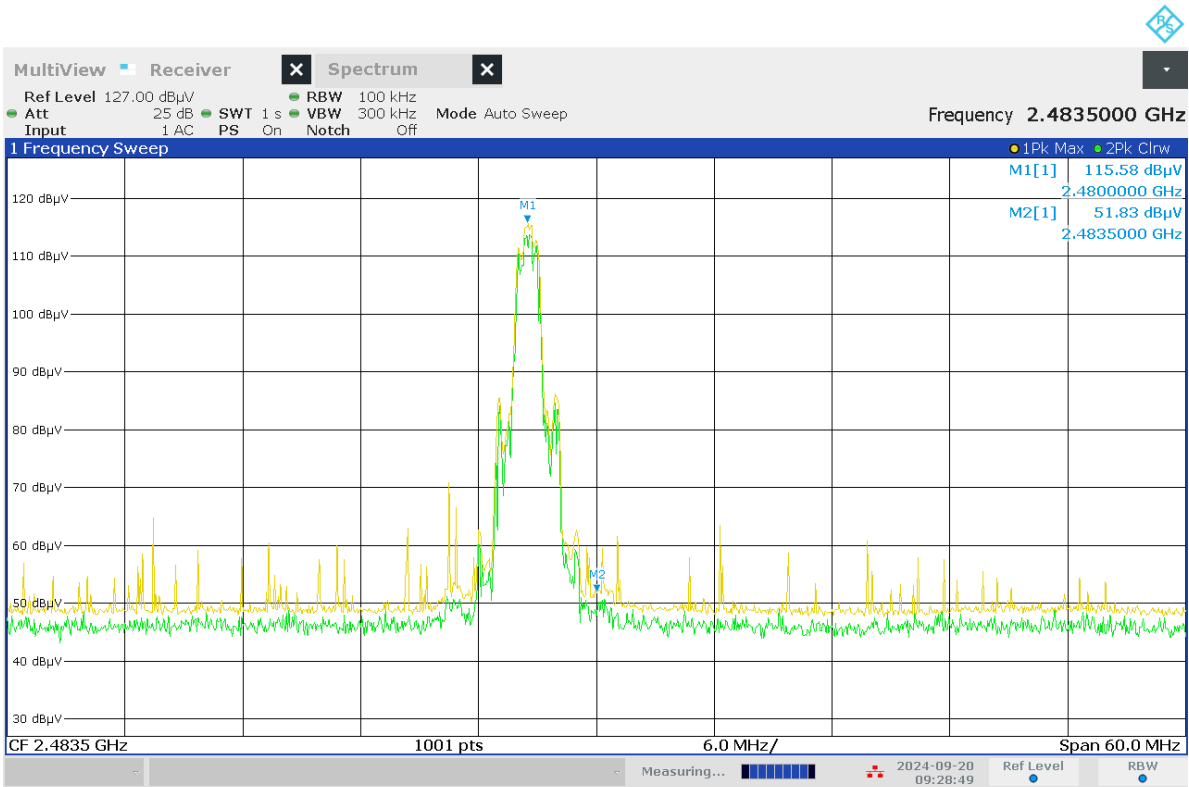
Report Number: C15656TR3

Spectrum analyser displays



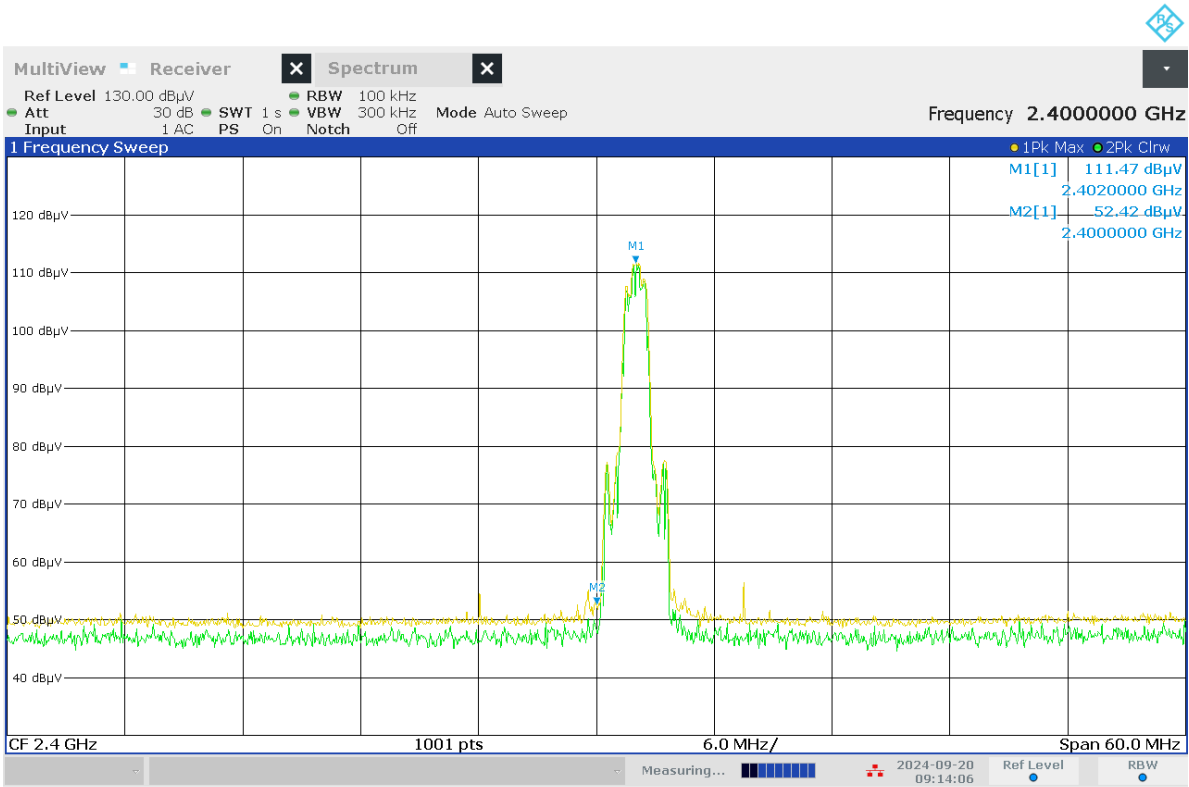
09:22:51 AM 09/20/2024

Figure 30 Band Edge Measurement – upper band edge - horizontal polarity



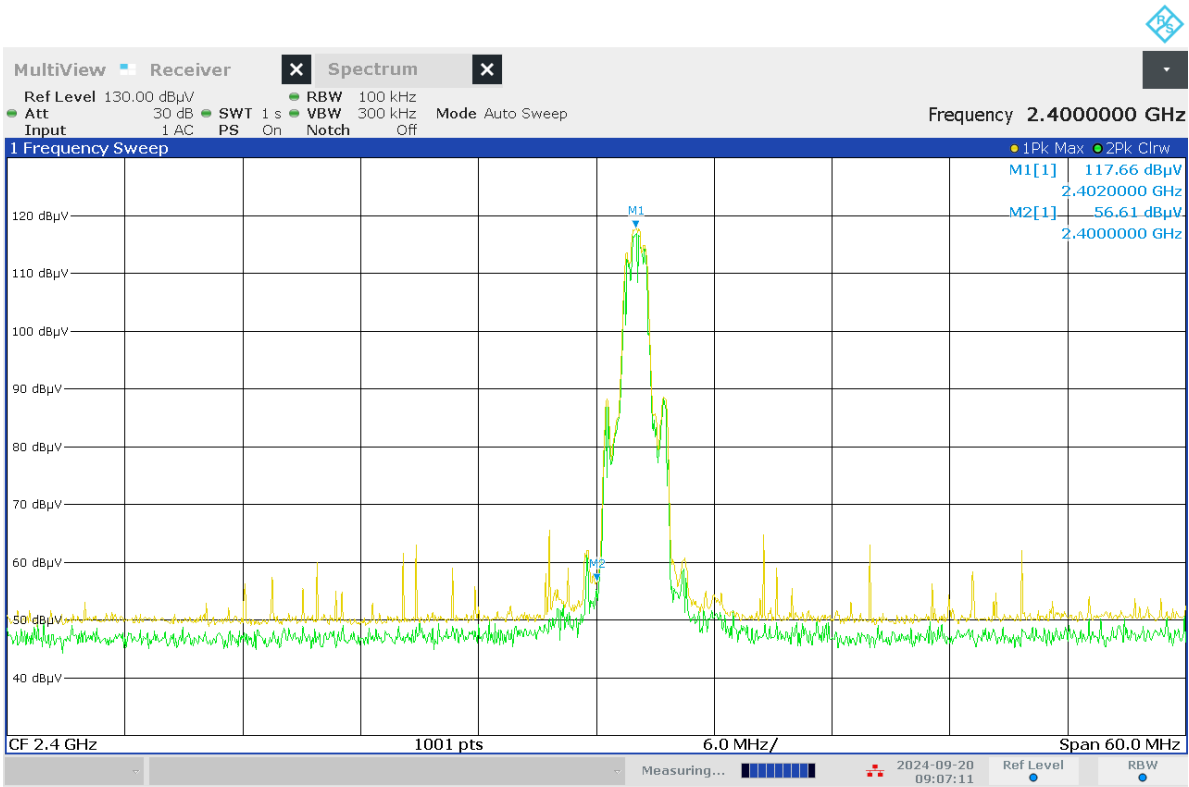
09:28:49 AM 09/20/2024

Figure 31 Band Edge Measurement – upper band edge - vertical polarity



09:14:06 AM 09/20/2024

Figure 32 Band Edge Measurement – lower band edge - horizontal polarity



09:07:11 AM 09/20/2024

Figure 33 Band Edge Measurement – lower band edge - vertical polarity

## **Appendix A EUT Test Photos**

**Test set up photographs are supplied separately.**



## Appendix B Test Equipment List

### Conducted Emissions from Antenna Port

Item	Serial No.	Last Calibration Date	Calibration Interval
R&S ESW44 EMI Receiver	C0658	30 <sup>th</sup> October 2023	12 Months
Kikusui PCR200M	C0198	-	-

**Radiated Emissions Equipment**

Item	Serial No.	Last Calibration Date	Calibration Interval
Laboratory 1 Semi-Anechoic Chamber	C0471	6 <sup>th</sup> December 2022	36 Months
ETS Lindgren 2017B Mast (1 – 4m) with tilting mechanism	--	N/A	N/A
R&S ESW44 EMI Receiver	C0751	5 <sup>th</sup> August 2024	12 Months
Kikusui PCR200M	C0198	-	-
Teseq CBL6112D Bilog Antenna	C0506	22 <sup>nd</sup> August 2024	36 Months
HF27 Cable	19149.03.13.004	13 <sup>th</sup> December 2023	12 Months
HF29 Cable	20147.01.09.001	13 <sup>th</sup> December 2023	12 Months
HF32 Cable	19149.01.09.003	13 <sup>th</sup> December 2023	12 Months
HF35 Cable	19149.02.13.003	13 <sup>th</sup> December 2023	12 Months
HF47 Cable	E44808	7 <sup>th</sup> March 2024	12 Months
Schwarzbeck STLP 9148 Antenna 1-18GHz	C0626	26 <sup>th</sup> March 2024	24 Months
2.4GHz Microtronics BRM50702 notch filter	79178	7 <sup>th</sup> December 2023	12 Months
BONN BLMA 0118-M Preamplifier	C0702	1 <sup>st</sup> August 2024	12 Months
ETS Lingren 3116C-PA Horn Antenna 18-40GHz	C0433	29 <sup>th</sup> September 2022	36 Months

-----END OF REPORT-----