

# Wireless test report – 353421-1TRFWL

Applicant:

**Thalmic Labs, Inc.**

Product name:

**Focals**

Model:

**Loop**

Model variant:

**Ring**

FCC ID:

**2ACKV-TL1B**

IC Registration number:

**12013A-TL1B**

Specifications:

◆ **FCC 47 CFR Part 15 Subpart C, §15.247**

Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz

◆ **RSS-247, Issue 2, Feb 2017, Section 5**

Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs)  
and Licence-Exempt Local Area Network (LE-LAN) Devices

5) Standard specifications for frequency hopping systems and digital transmission systems operating in the  
bands 902–928 MHz, 2400–2483.5 MHz and 5725–5850 MHz

Date of issue: **November 21, 2018**

Test engineer(s): **Andrey Adelberg, Senior Wireless/EMC Specialist**

Signature:



Reviewed by: **Yong Huang, Wireless/EMC Specialist**

Signature:



#### Test location(s)

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Website	www.nemko.com
Site number	FCC: CA2040; IC: 2040A-4 (3 m SAC)

#### Limits of responsibility

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Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contain in this report are within Nemko Canada's ISO/IEC 17025 accreditation.

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## Section 1. Report summary

### 1.1 Applicant and manufacturer

Company name	Thalmic Labs Inc
Address	24 Charles St West
City	Kitchener
Province/State	Ontario
Postal/Zip code	N2G 1H2
Country	Canada

### 1.2 Test specifications

FCC 47 CFR Part 15, Subpart C, Clause 15.247	Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–585 MHz
RSS-247, Issue 2, Feb 2017, Section 5	Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices

### 1.3 Test methods

558074 D01 DTS Meas Guidance v04 (April 5, 2017)	Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247
ANSI C63.10 v2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
RSS-Gen, Issue 5, April 2018	General Requirements for Compliance of Radio Apparatus

### 1.4 Statement of compliance

In the configuration tested, the EUT was found compliant.

Testing was performed against all relevant requirements of the test standard except as noted in section 1.5 below. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See “Summary of test results” for full details.

### 1.5 Exclusions

None

### 1.6 Test report revision history

Revision #	Date of issue	Details of changes made to test report
TRF	November 21, 2018	Original report issued

## Section 2. Summary of test results

### 2.1 FCC Part 15 Subpart C, general requirements test results

**Table 2.1-1: FCC general requirements results**

Part	Test description	Verdict
§15.207(a)	Conducted limits	Not applicable
§15.31(e)	Variation of power source	Pass
§15.31(m)	Number of tested frequencies	Pass
§15.203	Antenna requirement	Pass

Notes: EUT is a battery-operated device, the testing was performed using fresh batteries.

### 2.2 FCC Part 15 Subpart C, intentional radiators test results for digital transmission systems (DTS)

**Table 2.2-1: FCC 15.247 results for DTS**

Part	Test description	Verdict
§15.247(a)(2)	Minimum 6 dB bandwidth	Pass
§15.247(b)(3)	Maximum peak output power in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands	Pass
§15.247(c)(1)	Fixed point-to-point operation with directional antenna gains greater than 6 dBi	Not applicable
§15.247(c)(2)	Transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams	Not applicable
§15.247(d)	Spurious emissions	Pass
§15.247(e)	Power spectral density	Pass
§15.247(f)	Time of occupancy for hybrid systems	Not applicable

## 2.3 ISED RSS-Gen, Issue 5, test results

**Table 2.3-1: RSS-Gen results**

Part	Test description	Verdict
7.3	Receiver radiated emission limits	Not applicable
7.4	Receiver conducted emission limits	Not applicable
6.9	Operating bands and selection of test frequencies	Pass
8.8	AC power-line conducted emissions limits	Not applicable

Notes: <sup>1</sup> According to sections 5.2 and 5.3 of RSS-Gen, Issue 5 the EUT does not have a stand-alone receiver neither scanner receiver, therefore exempt from receiver requirements.

EUT is a battery-operated device, the testing was performed using fresh batteries.

## 2.4 ISED RSS-247, Issue 2, test results for digital transmission systems (DTS)

**Table 2.4-1: RSS-247 results for DTS**

Part	Test description	Verdict
5.2 (a)	Minimum 6 dB bandwidth	Pass
5.2 (b)	Maximum power spectral density	Pass
5.3	Hybrid Systems	
5.3 (a)	Digital modulation turned off	Not applicable
5.3 (b)	Frequency hopping turned off	Not applicable
5.4	Transmitter output power and e.i.r.p. requirements	
5.4 (d)	Systems employing digital modulation techniques	Pass
5.4 (e)	Point-to-point systems in 2400–2483.5 MHz and 5725–5850 MHz band	Not applicable
5.4 (f)	Transmitters which operate in the 2400–2483.5 MHz band with multiple directional beams	Not applicable
5.5	Unwanted emissions	Pass

Notes: None

## Section 3. Equipment under test (EUT) details

### 3.1 Sample information

Receipt date	June 28, 2018
Nemko sample ID number	1

### 3.2 EUT information

Product name	Focals
Model	Loop
Model variant	Ring
Serial number	None

### 3.3 Technical information

Applicant IC company number	12013A
IC UPN number	TL1B
All used IC test site(s) Reg. number	2040A-4
RSS number and Issue number	RSS-247 Issue 2, Feb 2017
Frequency band	2400–2483.5 MHz
Frequency Min (MHz)	2402
Frequency Max (MHz)	2480
RF power Max (W), Conducted	0.000719 (–1.43 dBm)
Field strength, Units @ distance	N/A
Measured BW (kHz) (99%)	1103
Calculated BW (kHz), as per TRC-43	N/A
Type of modulation	GFSK
Emission classification (F1D, G1D, D1D)	F1D
Transmitter spurious, dBμV/m @ 3 m	36.35 (average) at 2390 MHz
Power requirements	Internal battery 1.4 V <sub>DC</sub>
Antenna information	Internal antenna with maximum gain of –7 dBi

### 3.4 Product description and theory of operation

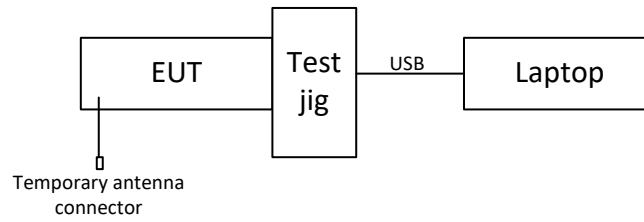
Wearable device which acts as an accessory input to a primary product, transmitting navigational information.

### 3.5 EUT exercise details

EUT was modified with antenna port. Test rig was provided with connection to Laptop which provided DC power via USB port. Control of the radio was done using command line interface.

### 3.6 EUT setup diagram

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**Figure 3.6-1:** Setup diagram

## Section 4. Engineering considerations

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### 4.1 Modifications incorporated in the EUT

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There were no modifications performed to the EUT during this assessment.

### 4.2 Technical judgment

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None

### 4.3 Deviations from laboratory tests procedures

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No deviations were made from laboratory procedures.

## Section 5. Test conditions

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### 5.1 Atmospheric conditions

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Temperature	15–30 °C
Relative humidity	20–75 %
Air pressure	860–1060 mbar

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

### 5.2 Power supply range

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The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages  $\pm 5\%$ , for which the equipment was designed.

## Section 6. Measurement uncertainty

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### 6.1 Uncertainty of measurement

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UKAS Lab 34 and TIA-603-B have been used as guidance for measurement uncertainty reasonable estimations with regards to previous experience and validation of data. Nemko Canada, Inc. follows these test methods in order to satisfy ISO/IEC 17025 requirements for estimation of uncertainty of measurement for wireless products.

Measurement uncertainty budgets for the tests are detailed below. Measurement uncertainty calculations assume a coverage factor of  $K = 2$  with 95% certainty.

**Table 6.1-1: Measurement uncertainty**

Test name	Measurement uncertainty, dB
All antenna port measurements	0.55
Conducted spurious emissions	1.13
Radiated spurious emissions	3.78
AC power line conducted emissions	3.55

## Section 7. Test equipment

### 7.1 Test equipment list

**Table 7.1-1: Equipment list**

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
3 m EMI test chamber	TDK	SAC-3	FA002047	1 year	Dec. 09/18
Flush mount turntable	Sunol	FM2022	FA002082	—	NCR
Controller	Sunol	SC104V	FA002060	—	NCR
Antenna mast	Sunol	TLT2	FA002061	—	NCR
Receiver/spectrum analyzer	Rohde & Schwarz	ESU 26	FA002043	1 year	March 26/19
Bilog antenna (20–3000 MHz)	Sunol	JB3	FA002108	1 year	Aug. 31/18
Horn with Preamp (1–18 GHz)	ETS-Lindgren	3117	FA002840	1 year	Dec. 07/18
Horn antenna (18–40 GHz)	EMCO	3116	FA001847	1 year	Aug. 31/18
Pre-amplifier (18–26 GHz)	Narda	BBS-1826N612	FA001550	—	VOU
Spectrum analyzer	Rohde & Schwarz	FSU	FA001877	1 year	July 18/18

Note: NCR - no calibration required, VOU - verify on use

## Section 8. Testing data

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### 8.1 FCC 15.31(e) Variation of power source

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#### 8.1.1 Definitions and limits

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For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage. For battery operated equipment, the equipment tests shall be performed using a new battery.

#### 8.1.2 Test date

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Start date	June 28, 2018
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#### 8.1.3 Observations, settings and special notes

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EUT was connected to the laptop for testing purposes, which provided power for the operation. Final product will be powered from the internal battery.

#### 8.1.4 Test data

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EUT Power requirements:	<input type="checkbox"/> AC	<input type="checkbox"/> DC	<input checked="" type="checkbox"/> Battery
If EUT is an AC or a DC powered, was the noticeable output power variation observed?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> N/A
If EUT is battery operated, was the testing performed using fresh batteries?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> N/A
If EUT is rechargeable battery operated, was the testing performed using fully charged batteries?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> N/A

## 8.2 FCC 15.31(m) and RSS-Gen 6.9 Number of frequencies

### 8.2.1 Definitions and limits

**FCC:**

Measurements on intentional radiators or receivers shall be performed and, if required, reported for each band in which the device can be operated with the device operating at the number of frequencies in each band specified in the following table.

**ISED:**

Except where otherwise specified, measurements shall be performed for each frequency band of operation for which the radio apparatus is to be certified, with the device operating at the frequencies in each band of operation shown in table below. The frequencies selected for measurements shall be reported in the test report.

**Table 8.2-1: Frequency Range of Operation**

Frequency range over which the device operates (in each band)	Number of test frequencies required	Location of measurement frequency inside the operating frequency range
1 MHz or less	1	Center (middle of the band)
1–10 MHz	2	1 near high end, 1 near low end
Greater than 10 MHz	3	1 near high end, 1 near center and 1 near low end

Note: “near” means as close as possible to or at the centre / low end / high end of the frequency range over which the device operates.

### 8.2.2 Test date

Start date June 29, 2018

### 8.2.3 Observations, settings and special notes

None

### 8.2.4 Test data

**Table 8.2-2: Test channels selection**

Start of Frequency range, MHz	End of Frequency range, MHz	Frequency range bandwidth, MHz	Low channel, MHz	Mid channel, MHz	High channel, MHz
2400.0	2483.5	83.5	2402	2440	2480

## 8.3 FCC 15.203 and RSS-Gen, section 6.8 Antenna requirement

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### 8.3.1 Definitions and limits

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**FCC:**

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. This requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with §15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

**ISED:**

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report.

### 8.3.2 Test date

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Start date	June 28, 2018
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### 8.3.3 Observations, settings and special notes

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None

### 8.3.4 Test data

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Must the EUT be professionally installed?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Does the EUT have detachable antenna(s)?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
If detachable, is the antenna connector(s) non-standard?	<input type="checkbox"/> YES	<input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A

## 8.4 FCC 15.247(a)(2) and RSS-247 5.2(a) Minimum 6 dB bandwidth

### 8.4.1 Definitions and limits

**FCC:**

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

**ISED:**

The minimum 6 dB bandwidth shall be 500 kHz.

### 8.4.1 Test date

Start date June 28, 2018

### 8.4.2 Observations, settings and special notes

Spectrum analyser settings:

Resolution bandwidth	100 kHz
Video bandwidth	$\geq 3 \times \text{RBW}$
Frequency span	2 MHz
Detector mode	Peak
Trace mode	Max Hold

### 8.4.3 Test data

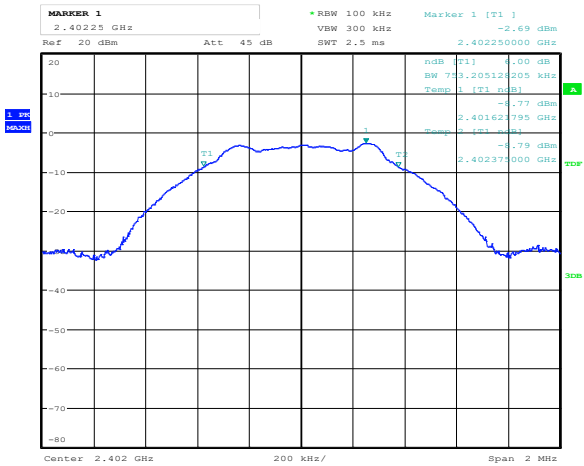
**Table 8.4-1: 6 dB bandwidth results**

Frequency, MHz	6 dB bandwidth, MHz	Minimum limit, MHz	Margin, MHz
2402	0.753	0.500	0.253
2440	0.734	0.500	0.234
2480	0.750	0.500	0.250

**Table 8.4-2: 99% occupied bandwidth results**

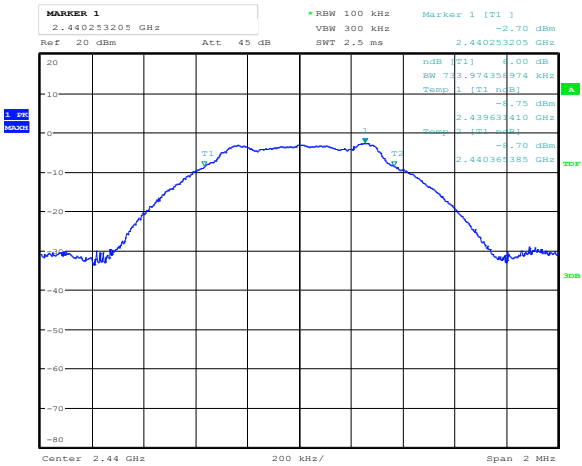
Frequency, MHz	99% occupied bandwidth, kHz
2402	1103
2440	1090
2480	1099

Note: there is no 99% occupied bandwidth limit in the standard's requirements, the measurement results provided for information purposes only.



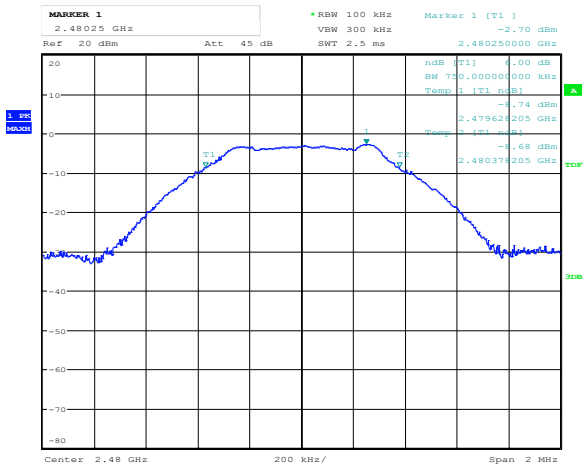
Date: 28.JUN.2018 14:32:34

Figure 8.4-1: 6 dB bandwidth on low channel



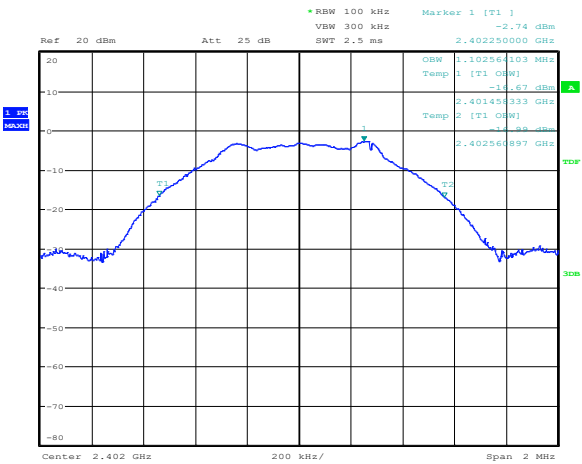
Date: 28.JUN.2018 14:34:22

Figure 8.4-2: 6 dB bandwidth on mid channel



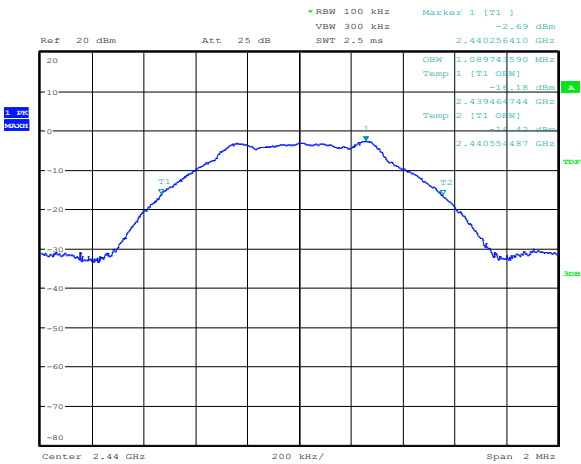
Date: 28.JUN.2018 14:35:41

Figure 8.4-3: 6 dB bandwidth on high channel



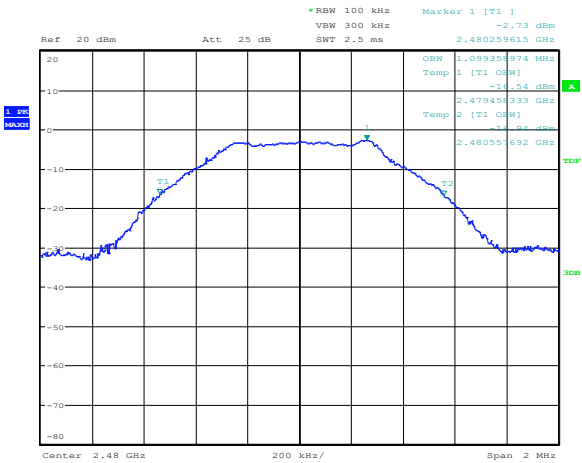
Date: 28.JUN.2018 14:32:58

Figure 8.4-4: 99% bandwidth on low channel



Date: 28.JUN.2018 14:34:44

Figure 8.4-5: 99% bandwidth on mid channel



Date: 28.JUN.2018 14:35:22

Figure 8.4-6: 99% bandwidth on high channel

## 8.5 FCC 15.247(b) and RSS-247 5.4 (d) Transmitter output power and e.i.r.p. requirements

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### 8.5.1 Definitions and limits

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**FCC:**

- (b) The maximum peak conducted output power of the intentional radiator shall not exceed the following:
- (3) For systems using digital modulation in the 2400–2483.5 MHz band: 1 W (30 dBm). As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.
  - (4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.
- (c) Operation with directional antenna gains greater than 6 dBi.
- (1) Fixed point-to-point operation:
- (i) Systems operating in the 2400–2483.5 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum conducted output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.
  - (iii) Fixed, point-to-point operation, as used in paragraphs (c)(1)(i) and (c)(1)(ii) of this section, excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum or digitally modulated intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.
- (2) In addition to the provisions in paragraphs (b)(1), (b)(3), (b)(4) and (c)(1)(i) of this section, transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams, simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers provided the emissions comply with the following:
- (i) Different information must be transmitted to each receiver.
  - (ii) If the transmitter employs an antenna system that emits multiple directional beams but does not do emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device, i.e., the sum of the power supplied to all antennas, antenna elements, staves, etc. and summed across all carriers or frequency channels, shall not exceed the limit specified in paragraph (b)(1) or (b)(3) of this section, as applicable. However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as follows:
    - (A) The directional gain shall be calculated as the sum of 10 log (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.
    - (B) A lower value for the directional gain than that calculated in paragraph (c)(2)(ii)(A) of this section will be accepted if sufficient evidence is presented, e.g., due to shading of the array or coherence loss in the beamforming.
  - (iii) If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the power limit specified in paragraph (c)(2)(ii) of this section. If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the limit specified in paragraph (c)(2)(ii) of this section. In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the limit specified in paragraph (c)(2)(ii) of this section by more than 8 dB.
  - (iv) Transmitters that emit a single directional beam shall operate under the provisions of paragraph (c)(1) of this section.

**ISED:**

d. For DTSSs employing digital modulation techniques operating in the 2400–2483.5 MHz band, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

e. Fixed point-to-point systems in the 2400–2483.5 MHz band are permitted to have an e.i.r.p. higher than 4 W provided that the higher e.i.r.p. is achieved by employing higher gain directional antennas and not higher transmitter output powers. Point-to-multipoint systems, omnidirectional applications and multiple co-located transmitters transmitting the same information are prohibited from exceeding an e.i.r.p. of 4 W.

f. Transmitters operating in the band 2400–2483.5 MHz, may employ antenna systems that emit multiple directional beams simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers, provided that the emissions comply with the following:

i Different information must be transmitted to each receiver.

ii If the transmitter employs an antenna system that emits multiple directional beams, but does not emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device (i.e. the sum of the power supplied to all antennas, antenna elements, staves, etc., and summed across all carriers or frequency channels) shall not exceed the applicable output power limit specified in sections 5.4(b) and 5.4(d). However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna/antenna array exceeds 6 dBi. The directional antenna gain shall be computed as the sum of 10 log (number of array elements or staves) plus the directional gain of the element or stave having the highest gain.

iii If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the applicable power limit specified in sections 5.4(b) and 5.4(d). If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the applicable limit specified in sections 5.4(b) and 5.4(d). In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the applicable limit specified in sections 5.4(b) and 5.4(d) by more than 8 dB.

iv Transmitters that transmit a single directional beam shall operate under the provisions of sections 5.4(b), 5.4(d) and 5.4(e).

## 8.5.1 Test date

Start date June 28, 2018

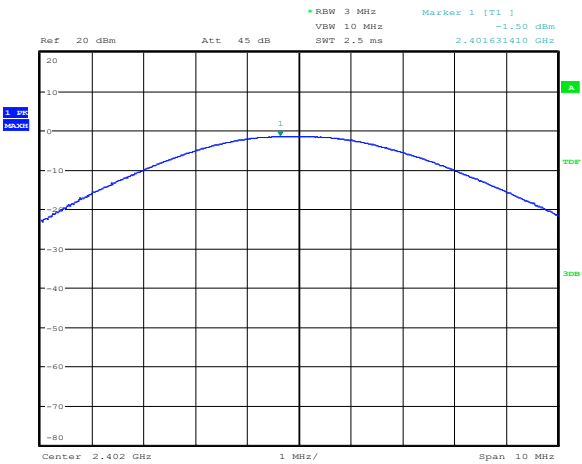
## 8.5.2 Observations, settings and special notes

The test was performed using peak method

## 8.5.3 Test data

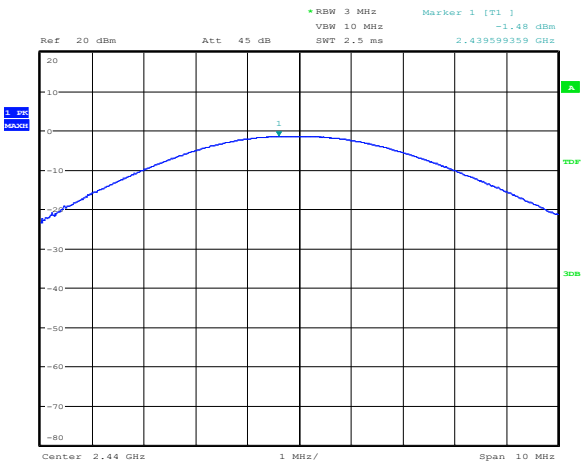
**Table 8.5-1: Output power measurements results**

Frequency, MHz	Conducted output power, dBm		Margin, dB	Antenna gain, dBi	EIRP, dBm	EIRP limit, dBm	EIRP margin, dB
	Measured	Limit					
2402	-1.50	30.00	31.50	-7.00	-8.50	36.00	44.50
2440	-1.48	30.00	31.48	-7.00	-8.48	36.00	44.48
2480	-1.43	30.00	31.43	-7.00	-8.43	36.00	44.43



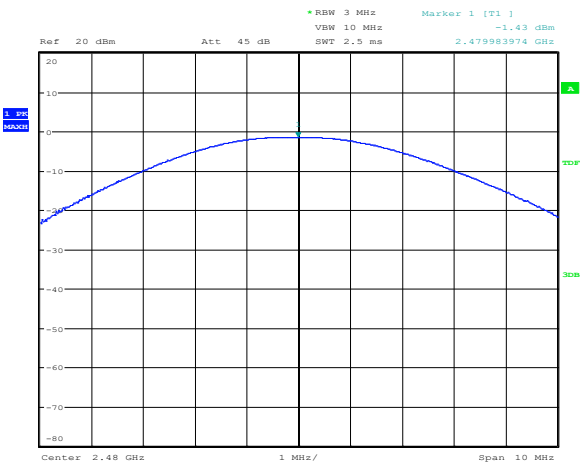
Date: 28.JUN.2018 14:29:01

Figure 8.5-1: Output power on low channel



Date: 28.JUN.2018 14:31:16

Figure 8.5-2: Output power on mid channel



Date: 28.JUN.2018 14:31:47

Figure 8.5-3: Output power on high channel

## 8.6 FCC 15.247(d) and RSS-247 5.5 Spurious (out-of-band) unwanted emissions

### 8.6.1 Definitions and limits

#### FCC:

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. 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) (see §15.205(c)).

#### ISED:

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 5.4(d), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

**Table 8.6-1: FCC §15.209 and RSS-Gen – Radiated emission limits**

Frequency, MHz	Field strength of emissions		Measurement distance
	µV/m	dBµV/m	m
30–88	100	40.0	3
88–216	150	43.5	3
216–960	200	46.0	3
above 960	500	54.0	3

Notes: In the emission table above, the tighter limit applies at the band edges.

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test

**Table 8.6-2: ISED restricted frequency bands**

MHz	MHz	MHz	GHz
0.090–0.110	12.57675–12.57725	399.9–410	7.25–7.75
0.495–0.505	13.36–13.41	608–614	8.025–8.5
2.1735–2.1905	16.42–16.423	960–1427	9.0–9.2
3.020–3.026	16.69475–16.69525	1435–1626.5	9.3–9.5
4.125–4.128	16.80425–16.80475	1645.5–1646.5	10.6–12.7
4.17725–4.17775	25.5–25.67	1660–1710	13.25–13.4
4.20725–4.20775	37.5–38.25	1718.8–1722.2	14.47–14.5
5.677–5.683	73–74.6	2200–2300	15.35–16.2
6.215–6.218	74.8–75.2	2310–2390	17.7–21.4
6.26775–6.26825	108–138	2483.5–2500	22.01–23.12
6.31175–6.31225	149.9–150.05	2655–2900	23.6–24.0
8.291–8.294	156.52475–156.52525	3260–3267	31.2–31.8
8.362–8.366	156.7–156.9	3332–3339	36.43–36.5
8.37625–8.38675	162.0125–167.17	3345.8–3358	
8.41425–8.41475	167.72–173.2	3500–4400	
12.29–12.293	240–285	4500–5150	Above 38.6
12.51975–12.52025	322–335.4	5350–5460	

Note: Certain frequency bands listed in Table 8.6-2 and above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

**Table 8.6-3: FCC restricted frequency bands**

MHz	MHz	MHz	GHz
0.090–0.110	16.42–16.423	399.9–410	4.5–5.15
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	2690–2900	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	Above 38.6
13.36–13.41			

#### 8.6.1 Test date

Start date June 28, 2018

#### 8.6.2 Observations, settings and special notes

The spectrum was searched from 30 MHz to the 10<sup>th</sup> harmonic.  
EUT was set to transmit with 100 % duty cycle.

Radiated measurements were performed at a distance of 3 m.

Since fundamental power was tested using the maximum peak conducted output power procedure to demonstrate compliance, the spurious emissions limit is –20 dBc/100 kHz. Cabinet radiation was performed with antenna port terminated with a matching load.

Conducted equivalent of the radiated limits within restricted bands was calculated as follows:

Peak field strength limit of 74 dBμV/m @ 3 m – 95.23 dB = –21.23 dBm (EIRP)

Average field strength limit of 54 dBμV/m @ 3 m – 95.23 dB = –41.23 dBm (EIRP)

Spectrum analyser settings for radiated measurements within restricted bands below 1 GHz:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for peak radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	3 MHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for average radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	10 Hz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for conducted spurious emissions measurements:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

#### 8.6.4 Test data

**Table 8.6-4:** Radiated field strength measurement results

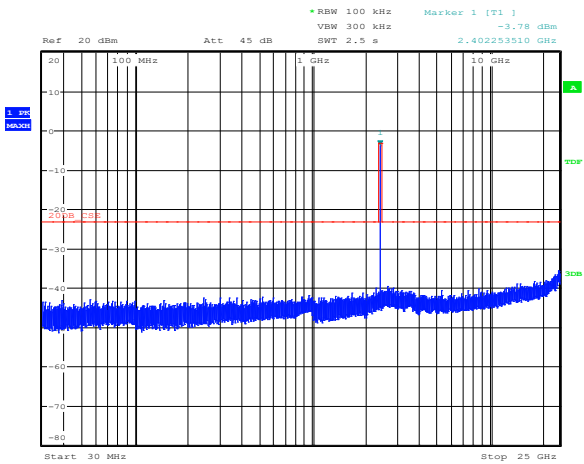
Channel	Frequency, MHz	Peak Field strength, dB $\mu$ V/m		Margin, dB	Average Field strength, dB $\mu$ V/m		Margin, dB
		Measured	Limit		Measured	Limit	
Low	2390.0	41.56	74.00	32.44	36.35	54.00	17.65
High	2483.5	40.84	74.00	33.16	35.88	54.00	18.12

Notes: Field strength includes correction factor of antenna, cable loss, amplifier, and attenuators where applicable.

**Table 8.6-5:** Conducted EIRP measurement results

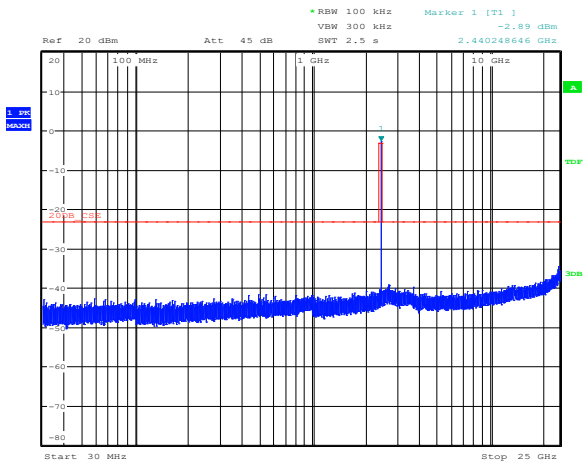
Channel	Frequency, MHz	Peak EIRP, dBm		Margin, dB	Average EIRP, dBm		Margin, dB
		Measured	Limit		Measured	Limit	
Low	2390.0	-52.92	-21.23	31.69	-62.76	-41.23	21.53
High	2483.5	-39.23	-21.23	18.00	-46.46	-41.23	5.23

Notes: Antenna gain of minimum 2 dBi was added to the conducted measurement results.



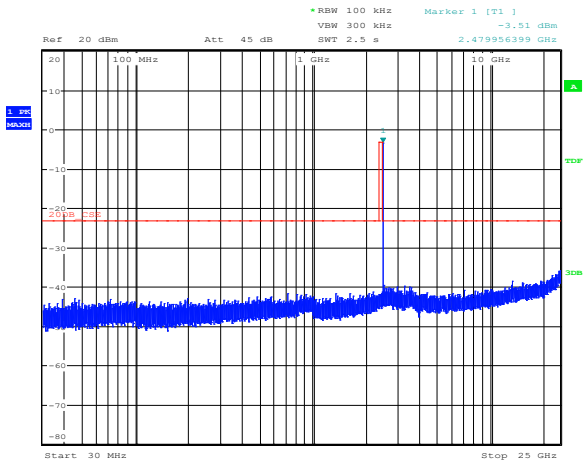
Date: 28.JUN.2018 14:39:57

Figure 8.6-1: Conducted spurious emissions, low channel



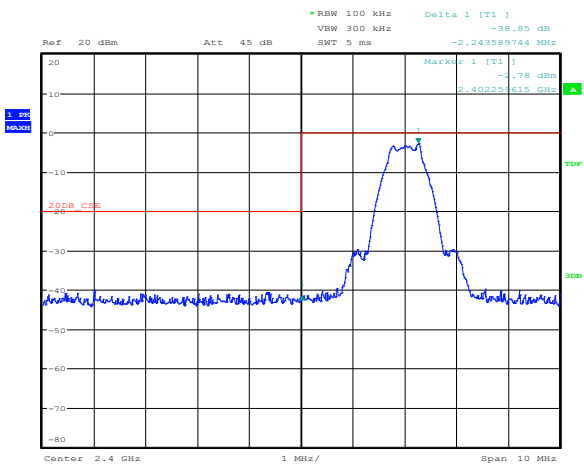
Date: 28.JUN.2018 14:43:01

Figure 8.6-2: Conducted spurious emissions, mid channel



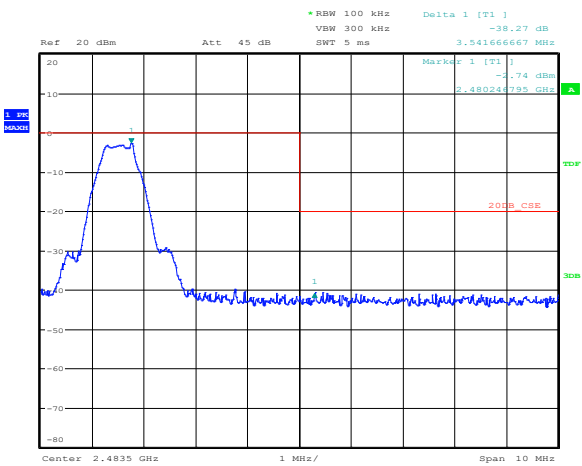
Date: 28.JUN.2018 14:44:34

Figure 8.6-3: Conducted spurious emissions, high channel



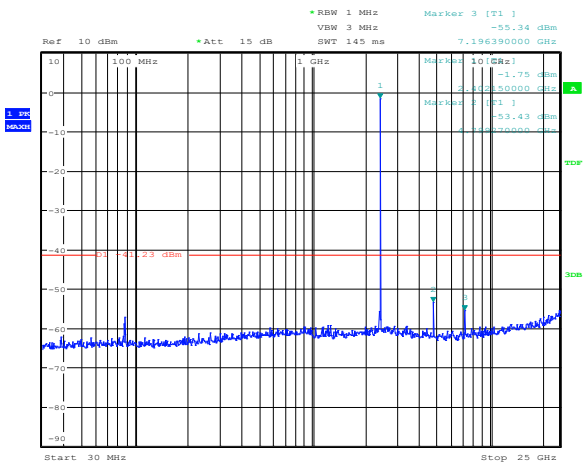
Date: 28.JUN.2018 14:37:57

Figure 8.6-4: Conducted spurious emissions at the lower band edge



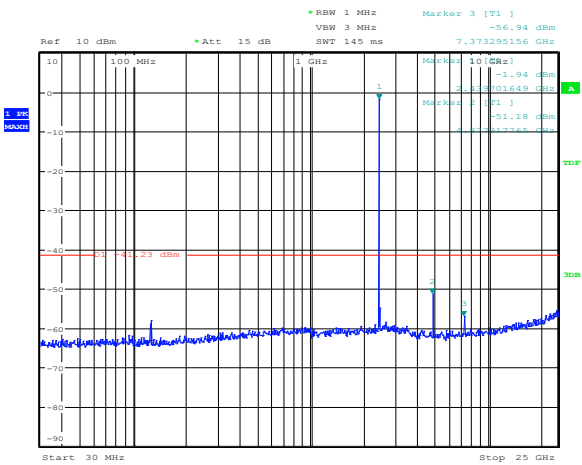
Date: 28.JUN.2018 14:37:27

Figure 8.6-5: Conducted spurious emissions at the upper band edge



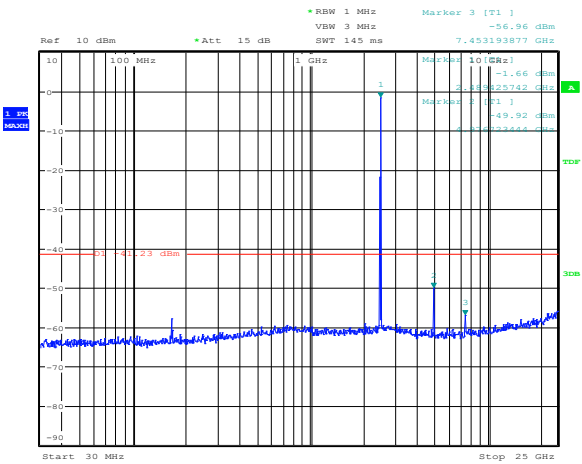
Date: 28.JUN.2018 14:54:27

Figure 8.6-6: Conducted spurious emissions within restricted bands, low channel



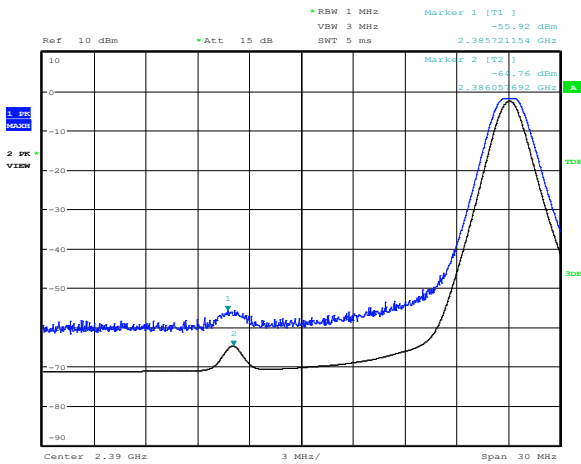
Date: 28.JUN.2018 14:55:11

Figure 8.6-7: Conducted spurious emissions within restricted bands, mid channel



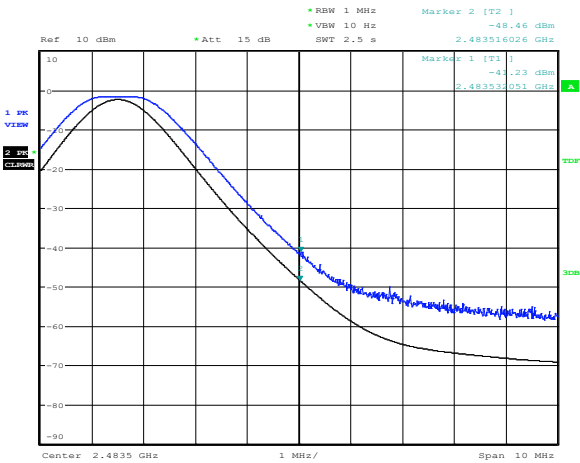
Date: 28.JUN.2018 14:55:50

Figure 8.6-8: Conducted spurious emissions within restricted bands, high channel



Date: 28.JUN.2018 14:52:58

Figure 8.6-9: Conducted spurious emissions within restricted bands, lower band edge



Date: 28.JUN.2018 14:50:21

Figure 8.6-10: Conducted spurious emissions within restricted bands, upper band edge

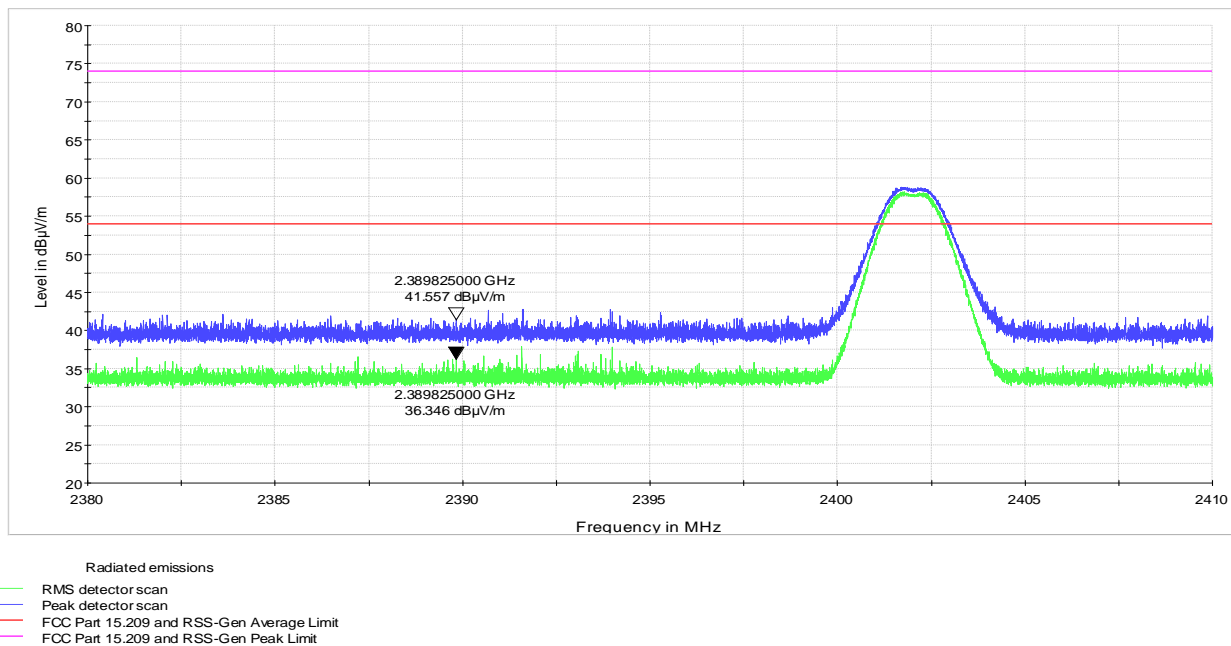


Figure 8.6-11: Radiated spurious emissions within restricted bands, lower band edge

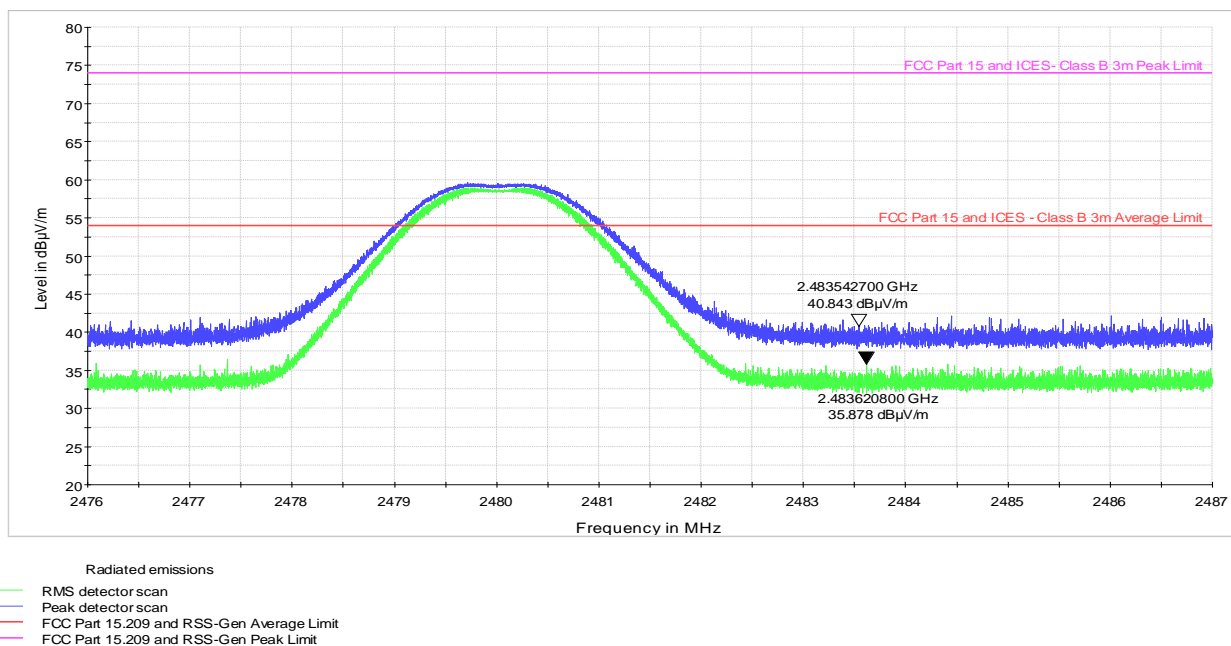


Figure 8.6-12: Radiated spurious emissions within restricted bands, upper band edge

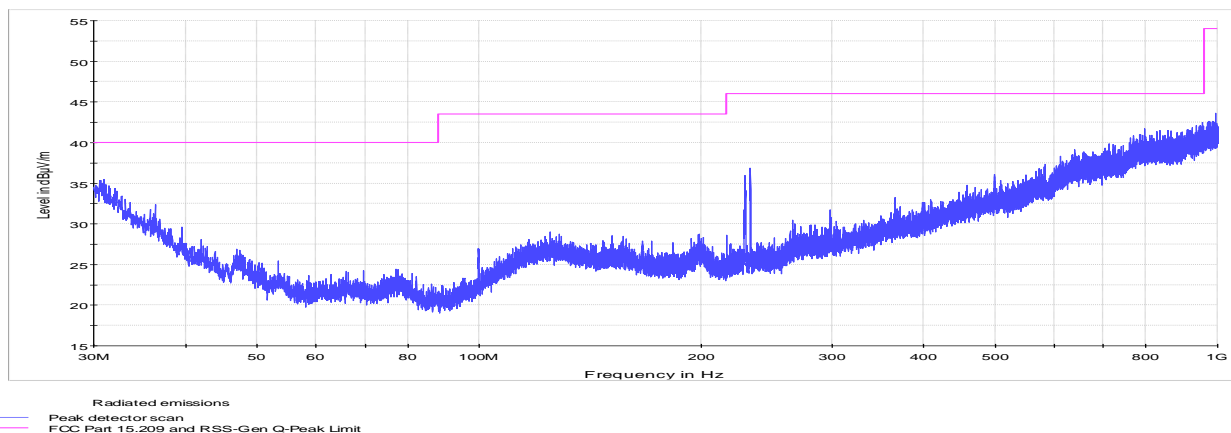


Figure 8.6-13: Radiated spurious emissions below 1 GHz, low channel

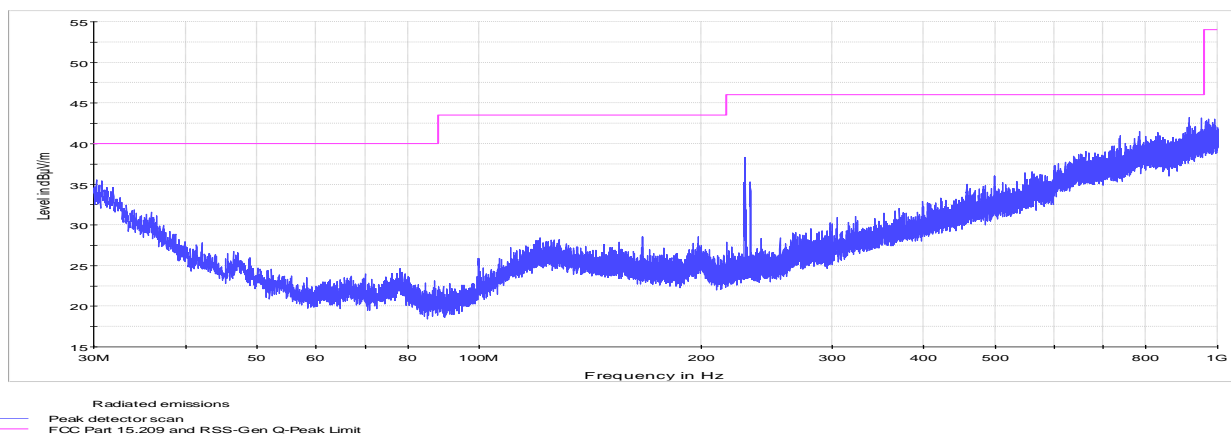


Figure 8.6-14: Radiated spurious emissions below 1 GHz, mid channel

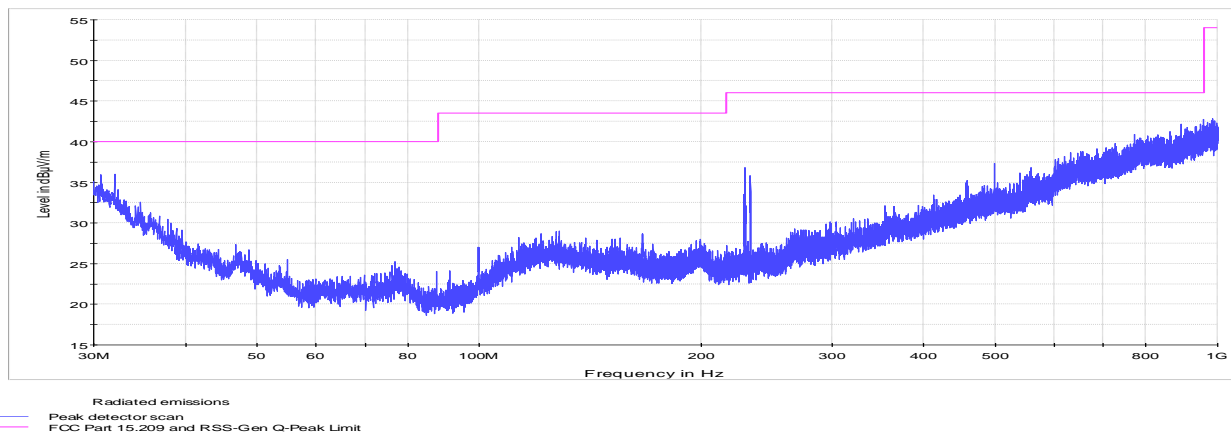


Figure 8.6-15: Radiated spurious emissions below 1 GHz, high channel

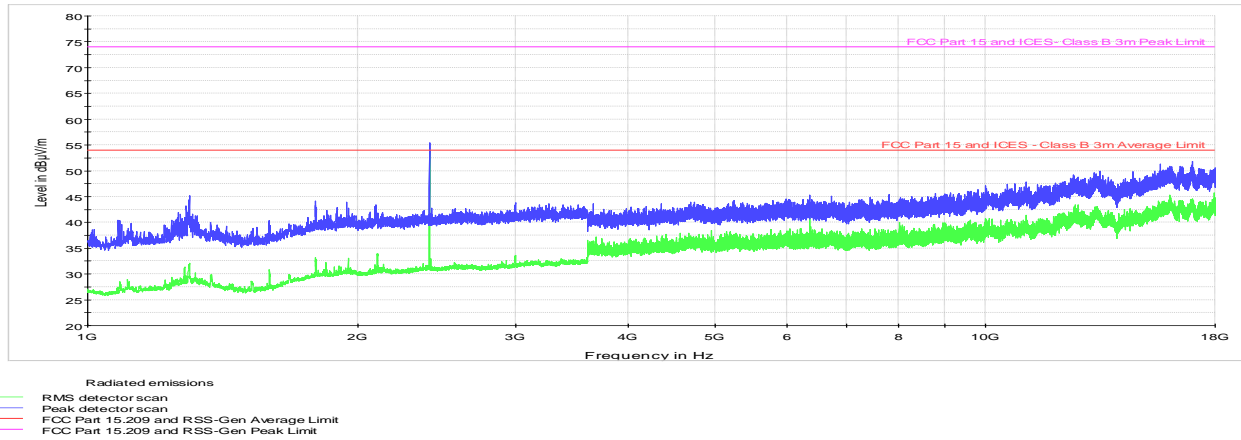


Figure 8.6-16: Radiated spurious emissions above 1 GHz, low channel

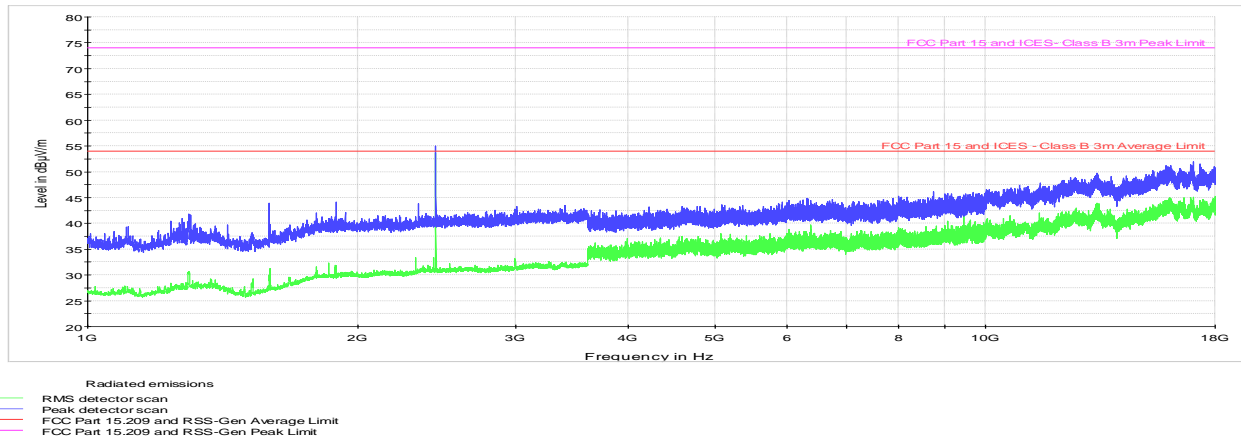


Figure 8.6-17: Radiated spurious emissions above 1 GHz, mid channel

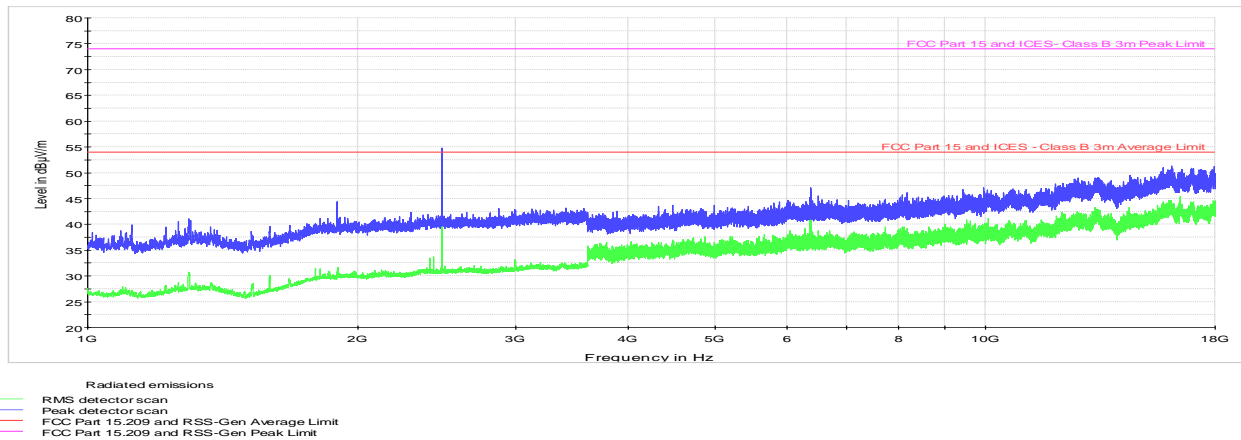


Figure 8.6-18: Radiated spurious emissions above 1 GHz, high channel

Note: spectrum was scanned up to 25 GHz. No emissions from the EUT's radio were detected.

## 8.7 FCC 15.247(e) and RSS-247 5.2(b) Power spectral density

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### 8.7.1 Definitions and limits

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**FCC:**

For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

**ISED:**

The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

### 8.7.1 Test date

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Start date	June 28, 2018
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### 8.7.2 Observations, settings and special notes

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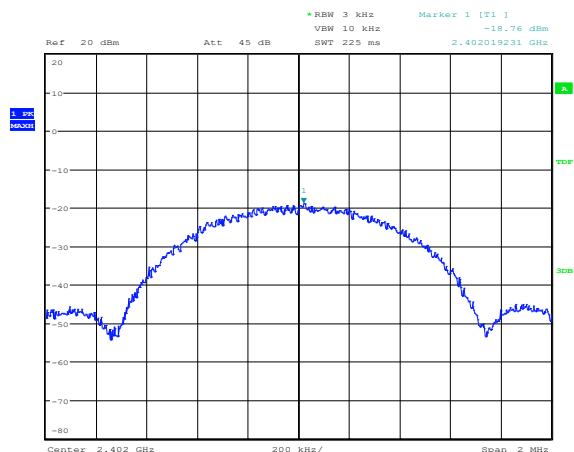
The test was performed using method PKPSD (peak PSD).  
Spectrum analyser settings:

Resolution bandwidth:	3 kHz
Video bandwidth:	$\geq 3 \times \text{RBW}$
Frequency span:	2 MHz
Detector mode:	Peak
Trace mode:	Max-hold

### 8.7.3 Test data

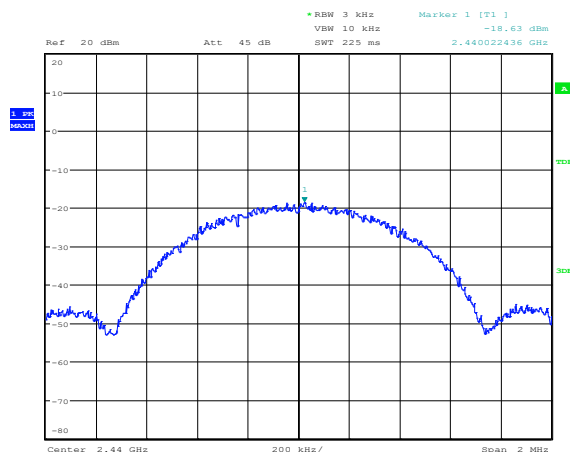
**Table 8.7-1: PSD measurements results**

Frequency, MHz	PSD, dBm/3 kHz	PSD limit, dBm/3 kHz	Margin, dB
2402	-18.76	8.00	26.76
2440	-18.63	8.00	26.63
2480	-17.86	8.00	25.86



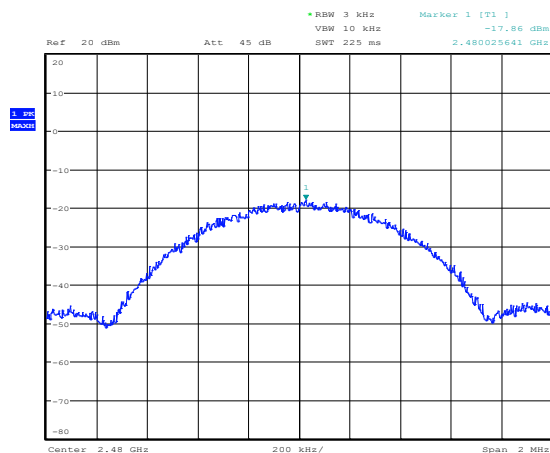
Date: 28.JUN.2018 14:33:21

**Figure 8.7-1: PSD sample plot on low channel**



Date: 28.JUN.2018 14:34:00

**Figure 8.7-2: PSD sample plot on mid channel**

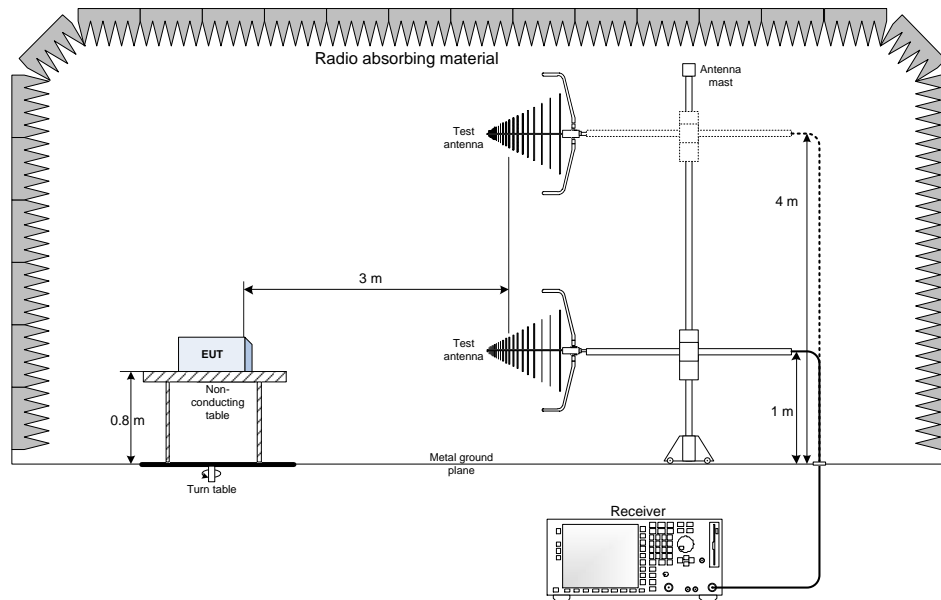


Date: 28.JUN.2018 14:36:07

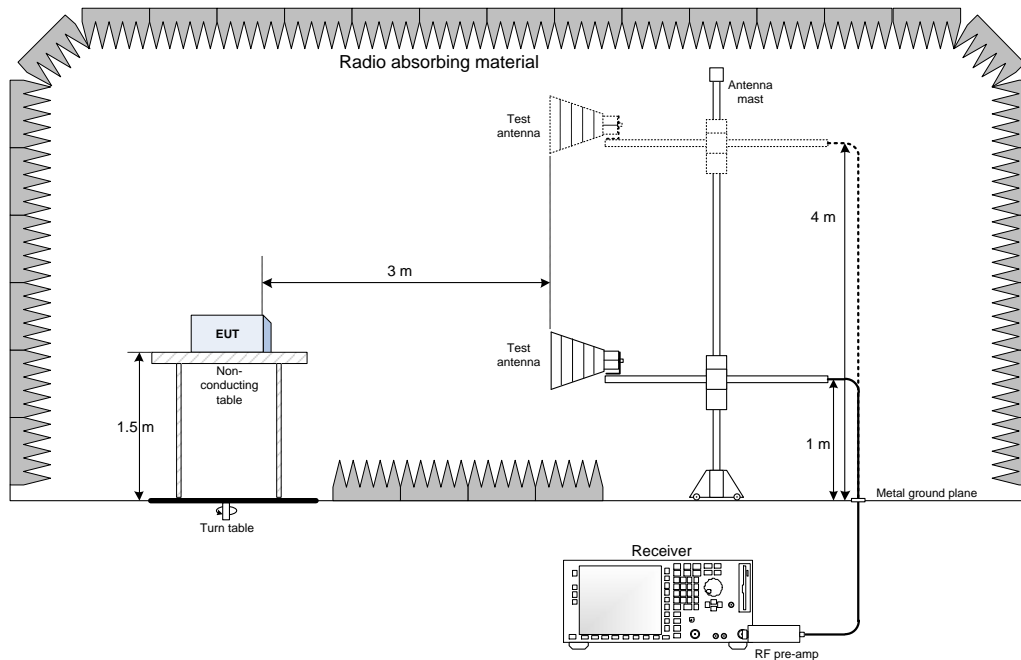
**Figure 8.7-3: PSD sample plot on high channel**

## Section 9. Block diagrams of test set-ups

### 9.1 Radiated emissions set-up for frequencies below 1 GHz

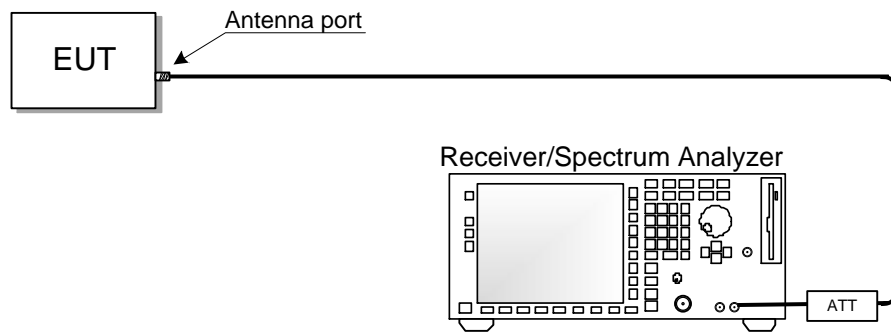


### 9.2 Radiated emissions set-up for frequencies above 1 GHz



### 9.3 Antenna port set-up

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END OF THE REPORT