



MET Laboratories, Inc. *Safety Certification - EMI - Telecom Environmental Simulation*

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March 23, 2015

Motion Dogs
719 Pismo St
San Luis Obispo, CA 93401

Dear David Thayer,

Enclosed is the EMC Wireless test report for compliance testing of the Motion Dogs, Lenzhound as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15, Subpart B, ICES-003, Issue 5 August 2012 for a Class B Digital Device and FCC Part 15 Subpart C, RSS-210, Issue 8, December 2010 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.

Jennifer Warnell
Documentation Department

Reference: (\Motion Dogs\EMCS84248-FCC249 Rev. 1)

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Electromagnetic Compatibility Criteria Test Report

for the

**Motion Dogs
Lenzhound**

Verified under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B & ICES-003
for Class B Digital Devices
&
15.249 Subpart C & RSS-210, Issue 8, December 2010
for Intentional Radiators

MET Report: EMCS84248-FCC249 Rev. 1

March 23, 2015

Prepared For:

**Motion Dogs
719 Pismo St
San Luis Obispo, CA 93401**

Prepared By:
MET Laboratories, Inc.
914 W. Patapsco Ave.
Baltimore, MD 21230

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for Intentional Radiators



Ajaz Khan, Project Engineer
Electromagnetic Compatibility Lab



Jennifer Warnell
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 Parts 15B, 15.249 and Industry Canada standards ICES-003, Issue 5 August 2012, RSS-210, Issue 8, December 2010 under normal use and maintenance.



Asad Bajwa, Director
Electromagnetic Compatibility Lab



Motion Dogs
Lenzhound

Electromagnetic Compatibility
Report Status
CFR Title 47, Part 15B, 15.249; RSS-210, Issue 8, December 2010 & ICES-003

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	February 10, 2015	Initial Issue.
1	March 23, 2015	Revised to reflect engineer corrections.

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List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	Kilohertz
kPa	Kilopascal
kV	Kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μH	Microhenry
μF	Microfarad
μs	Microseconds
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Motion Dogs Lenzhound, with the requirements of Part 15, §15.249. 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 Lenzhound. Motion Dogs should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the Lenzhound, 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, §15.249, in accordance with Motion Dogs, purchase order number 1029-14. All tests were conducted using measurement procedure ANSI C63.4-2003.

FCC Reference	Canada Reference	Description	Results
15.107	ICES-003	AC Power Line Conducted Emissions	Not Applicable
15.109	ICES-003	Radiated Emissions	Compliant
§15.203	RSS GEN §7.1.2	Antenna Requirement	Compliant
§15.207	RSS GEN §7.2.4	AC Power Line Conducted Emissions	Not Applicable
§15.249 (a)	RSS-210 A2.9	Field Strength of Fundamental	Compliant
§15.249(a)(d), §15.209	RSS-Gen §7.2.5 and RSS-210 A2.0	Harmonics and Spurious Emissions	Compliant

Table 1. Executive Summary of EMC Part 15.249 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by Motion Dogs to perform testing on the Lenzhound, under Motion Dogs's purchase order number 1029-14.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Motion Dogs, Lenzhound.

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

Model(s) Tested:	Lenzhound	
EUT Specifications:	Primary Power to Module: 6V DC Battery.	
	FCC ID: 2ADQEMDLH1 IC: 12707A-RTX1DB1	
	Type of Modulations:	GFSK
	Equipment Code:	DXX
	Highest Fundamental Field Strength:	77.5 dBuV/m @ 3m (Average)
	EUT Frequency Ranges:	2401 – 2481 MHz
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature (15-35° C)	
	Relative Humidity (30-60%)	
	Barometric Pressure (860-1060 mbar)	
Evaluated by:	Djed Mouada	
Report Date(s):	March 23, 2015	

Table 2. EUT Specifications

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
CFR 47, Part 15, Subpart B	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
RSS-210, Issue 8, December 2010	Low-power License-exempt Radiocommunications Devices (All Frequency Bands): Category I Equipment
ICES-003, Issue 5 August 2012	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ANSI C63.4:2003	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 C63.10-2009	American National Standard for Testing Unlicensed Wireless Devices

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 3162 Belick Street, Santa Clara, CA 95054. 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 semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

D. Description of Test Sample

The Lenzhound is a wireless follow focus systems. Designed for independent filmmakers, the system consists of the handheld Remote Transmitter Unit (RTX-1) and the Motor/Receiver unit (DB-1) which attaches to the user's DSLR or video camera. The DB-1 lens motor is targeted towards DSLR and video cameras employing lenses with manual operation rings in order to operate the focus ring without touching the camera. This is useful for steadicams, sliders, cranes and other camera mount situations where touching the camera is not possible or desirable.

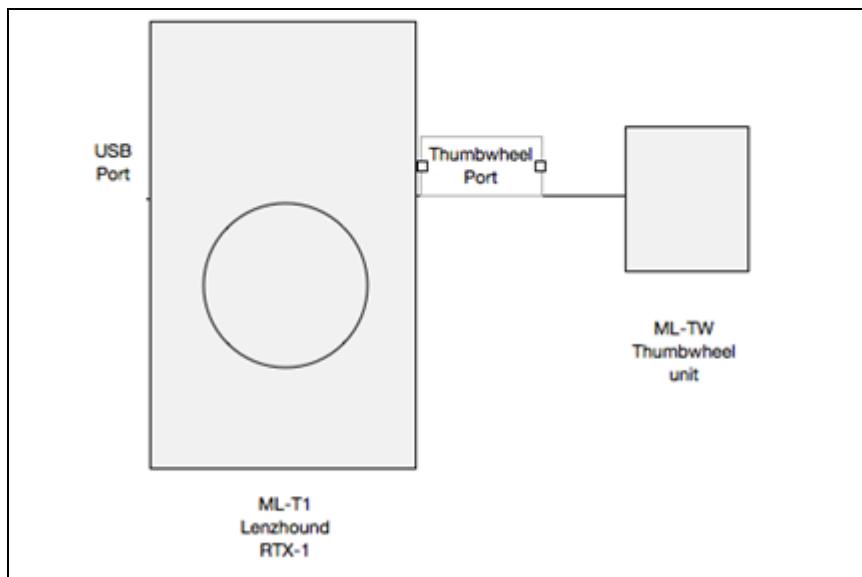


Figure 1. Block Diagram of Test Configuration

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	Name / Description	Model Number	Part Number	Serial Number	Revision
ML-T1	Remote Transmitter	RTX-1	--	TX-0003	--
ML-T2	Remote Transmitter - SMA	RTX-1	--	TX-0004	--
ML-T3	Remote Transmitter - alt.	RTX-1	--	TX-0005	--
ML-R1	Receiver/Motor	DB-1	--	RX-0003	--
ML-R2	Receiver/Motor - SMA	DB-1	--	RX-0004	--
ML-USB	USB AC Pwr Adapter	TC U250	--	--	--

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
ML-LAP	Vaio Laptop	Sony	PCG-61112L

Table 5. Support Equipment

G. Ports and Cabling

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
1	USB	4' USB Cable	1	1	2	Yes	5V Pwr Supply
2	Thumbwheel	18" Thumbwheel unit	1	0.5	0.5	Yes	(230v/50hz)

Table 6. Support Equipment

H. Mode of Operation

The default operating mode is Free Run and this is the mode for this configuration. The RTX-1 sends a steady stream of motor-position information (packets at approx. 100Hz.) in this mode. To enter this mode after power-up, the motor position needs to be “calibrated” which is simply setting a min. and max. position with the rotary encoder knob. A typical range is two revolutions of the encoder.

Normal operation of the unit entails holding the RTX-1 unit in one’s hand and operating the Main Focus Knob. As a battery operated, handheld remote, it is typical to have nothing else connected to the remote while used in this way. However, the unit does come standard with a USB data port and a “Thumbwheel Port”. The latter is used to connect a remote potentiometer via an 18” shielded mini TRS (headphone) cable.

I. Monitoring Method

1. A flashing green LED located by the mode switch will indicate the unit is operating normally, indicating a data packet with motor position is being transmitted at approximately 100Hz.
2. If the green LED is not illuminated or not flashing, or, if the white, marking disk LEDs are flashing, radio transmission of data is not occurring.

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 Motion Dogs upon completion of testing.

III. Electromagnetic Compatibility Criteria for Unintentional Radiators

Electromagnetic Compatibility Criteria for Unintentional Radiators

§ 15.107 Conducted Emissions Limits

Test Requirement(s): **15.107 (a)** “Except for Class A digital devices, for equipment 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 30 MHz shall not exceed the limits in Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals.”

15.107 (b) “For a Class A digital device 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 30 MHz shall not exceed the limits in Table 7. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals. The lower limit applies at the band edges.”

Frequency range (MHz)	15.107(b), Class A Limits (dB μ V)		15.107(a), Class B Limits (dB μ V)	
	Quasi-Peak	Average	Quasi-Peak	Average
0.15- 0.5	79	66	66 - 56	56 - 46
0.5 – 5.0	73	60	56	46
5.0 - 30	73	60	60	50

Note 1 — The lower limit shall apply at the transition frequencies.

Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Section 15.107(a) (b)

Test Results: The EUT was not applicable with the Class B requirement(s) of this section. The EUT is battery operated.

Radiated Emission Limits

§ 15.109 Radiated Emissions Limits

Test Requirement(s): **15.109 (a)** Except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the Class B limits expressed in Table 8.

15.109 (b) The field strength of radiated emissions from a Class A digital device, as determined at a distance of 10 meters, shall not exceed the Class A limits expressed in Table 8.

Frequency (MHz)	Field Strength (dB μ V/m)	
	§15.109 (b), Class A Limit (dB μ V) @ 10m	§15.109 (a), Class B Limit (dB μ V) @ 3m
30 - 88	39.00	40.00
88 - 216	43.50	43.50
216 - 960	46.40	46.00
Above 960	49.50	54.00

Table 8. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b)

Test Procedures: The EUT was placed on a 0.08m-high acrylic table inside a semi-anechoic chamber. The method of testing and test conditions of ANSI C63.4 were used. An antenna was located 3 m from the EUT on an adjustable mast. A pre-scan was first performed in order to find prominent radiated emissions. The EUT was rotated and the antenna height was varied between 1 m and 4 m in order to maximize the emission. Measurements in both horizontal and vertical polarities were made.

For the purposes of demonstrating compliance, a peak plot was taken and compared to a quasi-peak limit line. No peak emissions were detected within 10 dB of the quasi-peak limit.

Test Results: The EUT was found compliant with the Class B requirement(s) of this section. Measured emissions were below applicable limits.

Test Engineer(s): Dan Phan

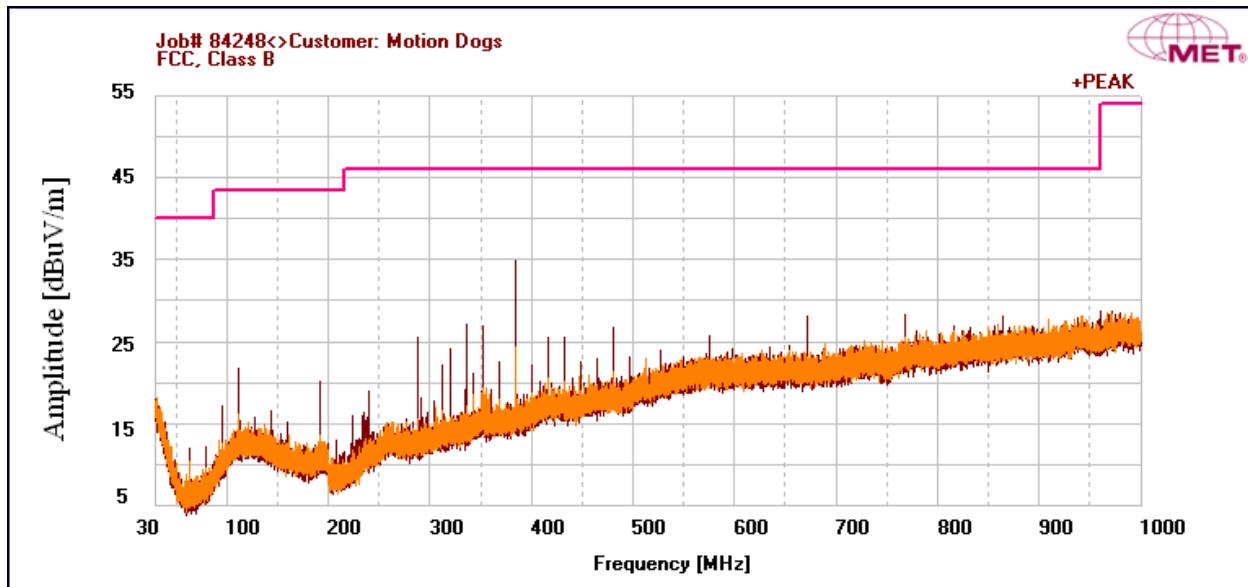
Test Date(s): 11/12/14

Radiated Emissions Limits Test Results, Class B

Frequency (MHz)	Antenna Polarity	EUT Azimuth (Degrees)	Antenna Height (cm)	Uncorrected Amplitude (dB μ V)	ACF (dB/m)	Pre Amp Gain (dB)	CBL (dB)	DCF (dB)	Corrected Amplitude (dB μ V)	Limit (dB μ V)	Margin (dB)
112	H	205	289.11	7.18	12.448	0	1.843	0	21.471	43.5	-22.029
336	H	331	100	9.78	13.794	0	3.305	0	26.879	46	-19.121
384	H	287	100	16.19	15.054	0	3.533	0	34.777	46	-11.223
480.04	H	360	206.94	3.62	16.88	0	3.928	0	24.428	46	-21.572
672.04	H	286	124.82	5.46	18.842	0	4.786	0	29.088	46	-16.912
768.04	H	297	100	1.67	19.741	0	5.06	0	26.471	46	-19.529

Table 9. Radiated Emissions Limits, Test Results

Radiated Emissions Limits Test Results, Class B



Plot 1. Radiated Emissions, Pre-Scan, 30 MHz – 1 GHz

IV. 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.

Test Results: The EUT is compliant with §15.203. The EUT's antenna has an integrated antenna.

Test Engineer(s): Ajaz Khan

Test Date(s): 11/17/14

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.249(a) Radiated Field Strength of Fundamental

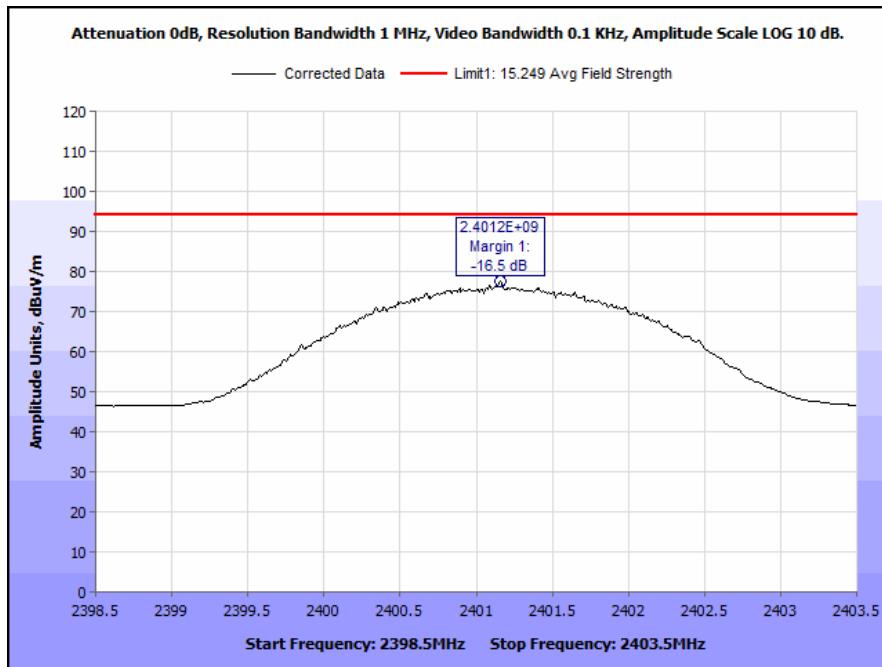
Test Requirements: **§ 15.249(a):** The 3 meter field strength of the fundamental emissions from intentional radiators operated within the 2400-2483.5 MHz frequency bands shall comply with the following requirement: 50 millivolts/meter (94dB μ V/m), quasi-peak mode measurement.

Test Procedure: 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. The antenna was placed 3m away from the EUT. The EUT was rotated about all three orthogonal axis.

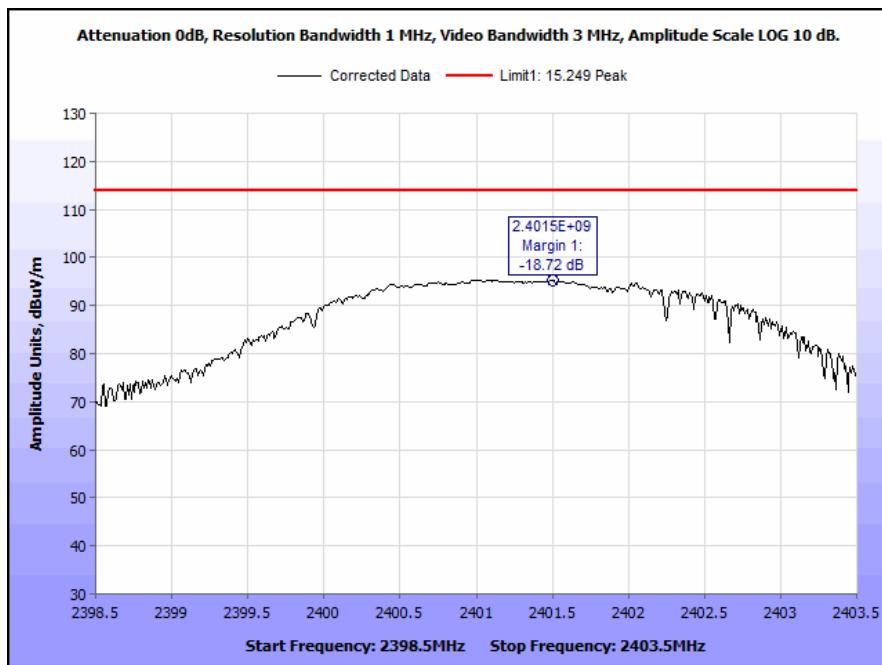
Test Results: The EUT is compliant with the requirements of § 15.249(a). Device default configuration was for 83 channels. Due to band edge failure, channels were reduced to 81 channels.

Test Engineer(s): Ajaz Khan

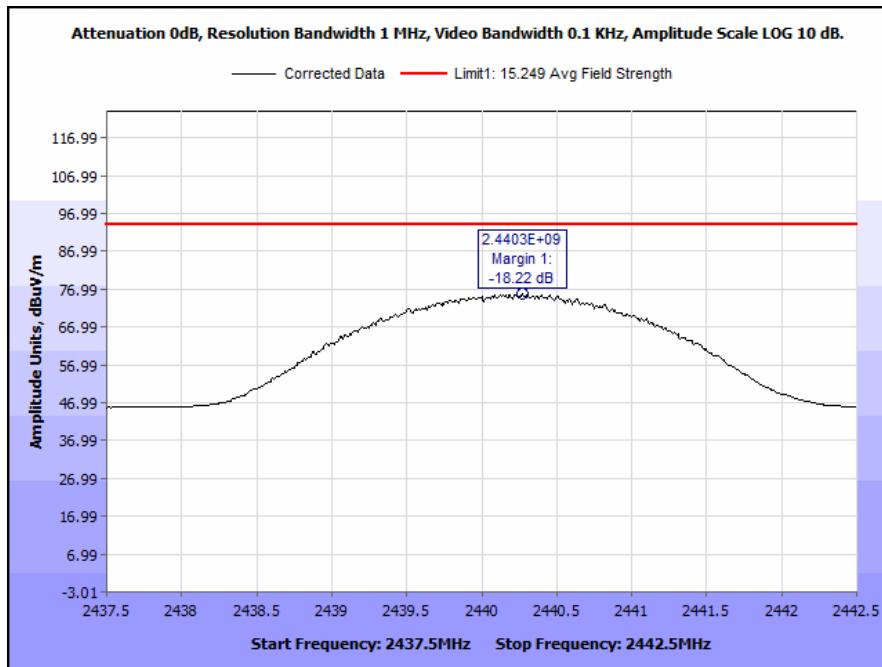
Test Date(s): 11/17/14



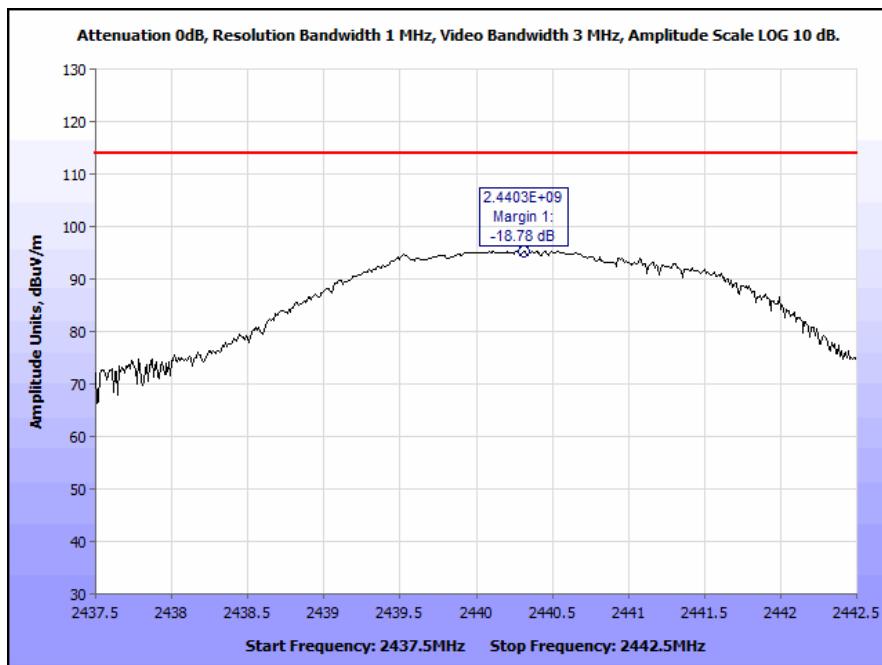
Plot 2. Radiated Field Strength of Fundamental, Low Channel, 2401 MHz, Average



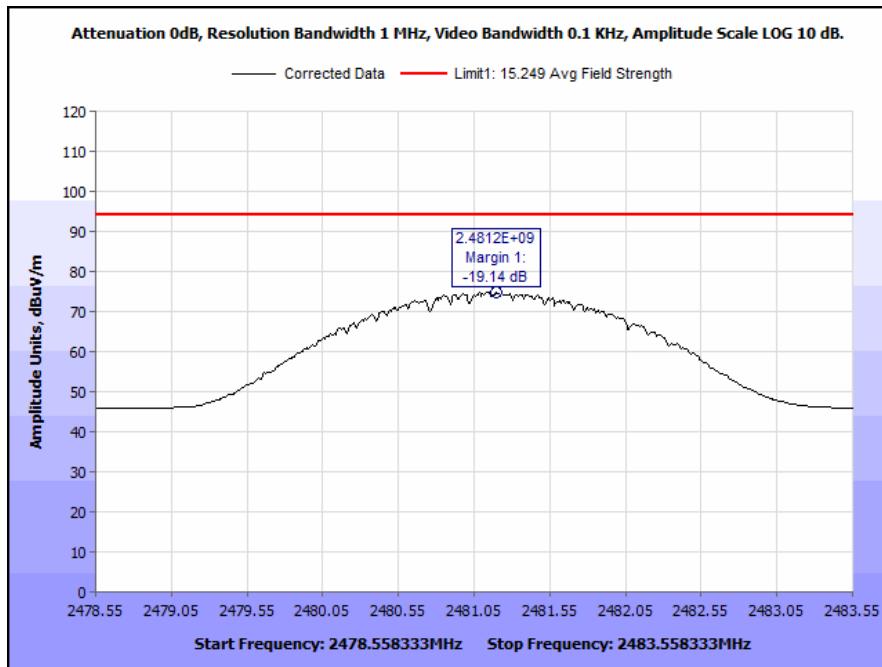
Plot 3. Radiated Field Strength of Fundamental, Low Channel, 2401 MHz, Peak



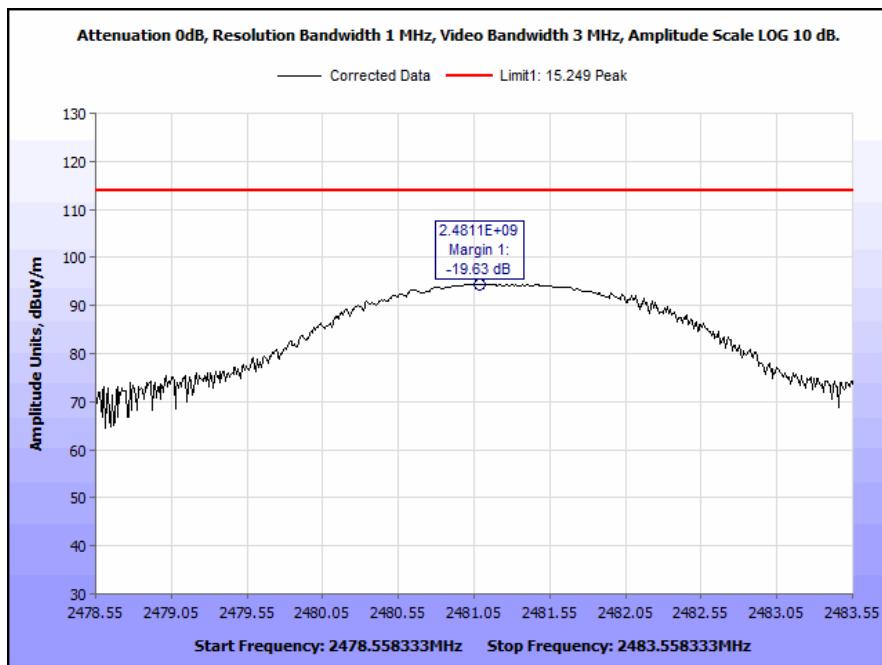
Plot 4. Radiated Field Strength of Fundamental, Mid Channel, 2440 MHz, Average



Plot 5. Radiated Field Strength of Fundamental, Mid Channel, 2440 MHz, Peak



Plot 6. Radiated Field Strength of Fundamental, High Channel, 2481 MHz, Average



Plot 7. Radiated Field Strength of Fundamental, High Channel, 2481 MHz, Peak

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.249(a)(d) Harmonics and Spurious Emissions Requirements

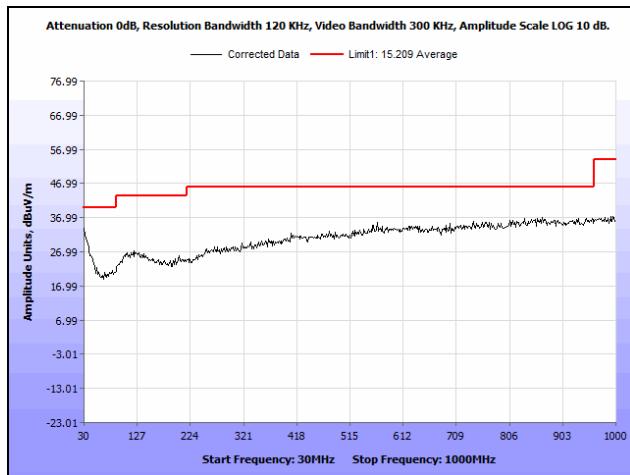
Test Requirements: Harmonics originating from devices that operate in the 2400-2483.5 MHz band shall meet the 500 microvolts/meter limit (i.e. 54dB μ V/m@3m) with an average detector. In addition, emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in §15.209, whichever is the lesser attenuation.

Test Procedure: 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. Emissions below 1 GHz were performed with the antenna placed 3m away from EUT. For above 1 GHz, the measuring antenna was placed 1m away.

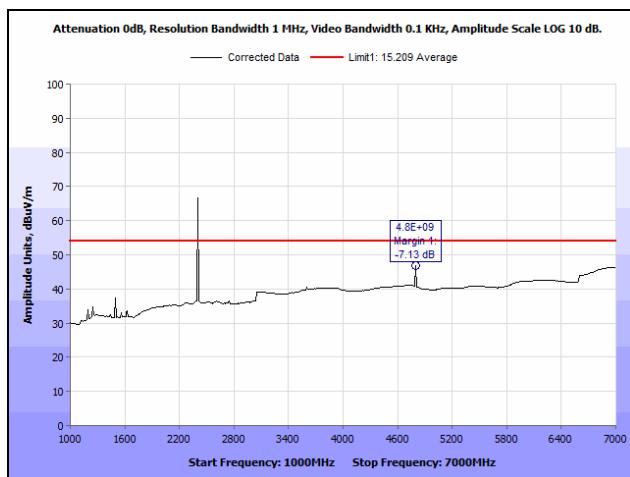
Test Results: The EUT is compliant with the harmonics and Spurious Emissions Requirements of §15.249(a)(d). For spurious emissions the lesser attenuation was the 15.209 limits. Beyond 18GHz only noise floor was seen.

Test Engineer(s): Ajaz Khan

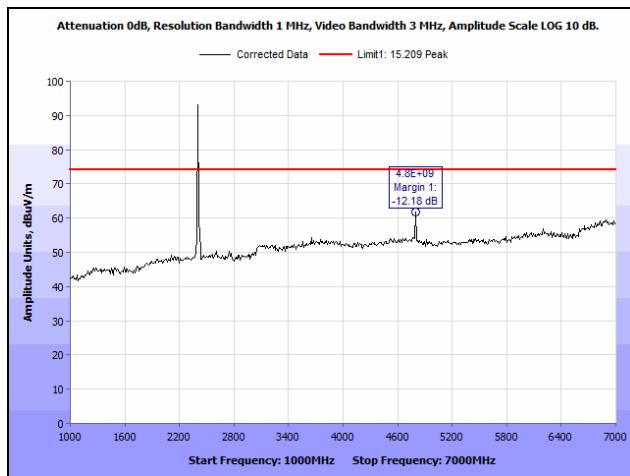
Test Date(s): 11/17/14



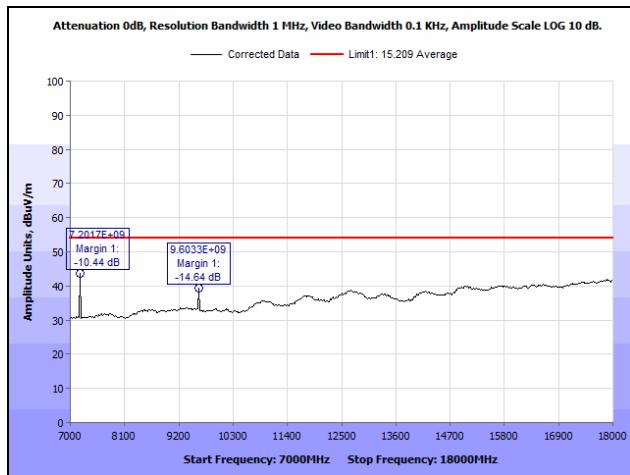
Plot 8. Radiated Harmonics, Low Channel, 2401 MHz, 30 MHz – 1 GHz, Peak



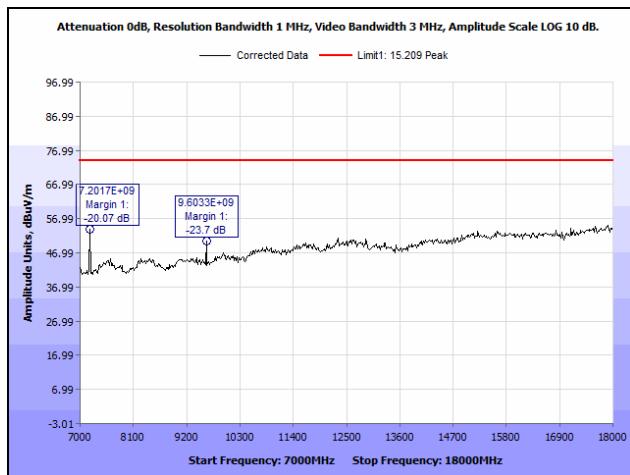
Plot 9. Radiated Harmonics, Low Channel, 2401 MHz, 1 GHz – 7 GHz, Average



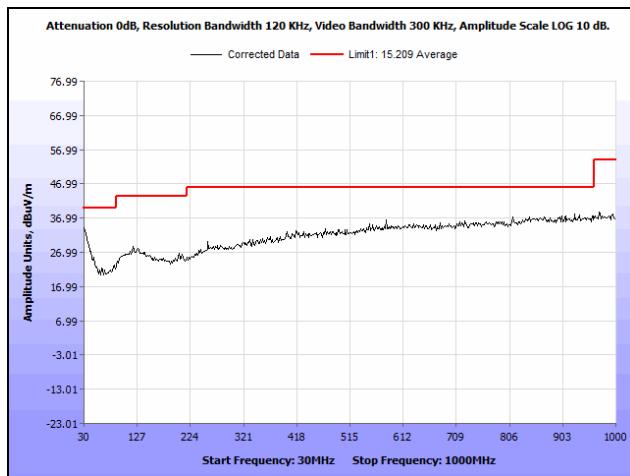
Plot 10. Radiated Harmonics, Low Channel, 2401 MHz, 1 GHz – 7 GHz, Peak



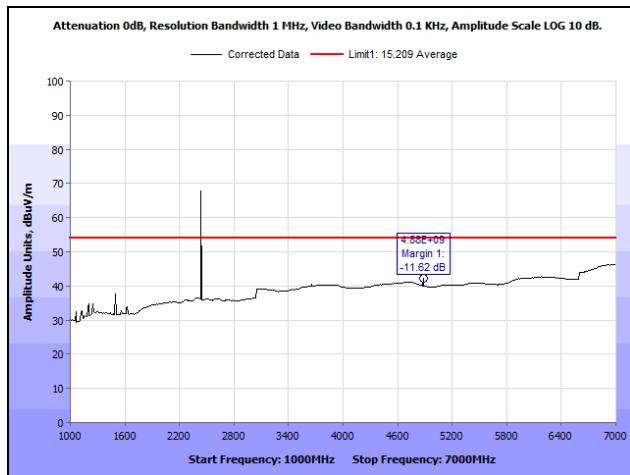
Plot 11. Radiated Harmonics, Low Channel, 2401 MHz, 7 GHz – 18 GHz, Average



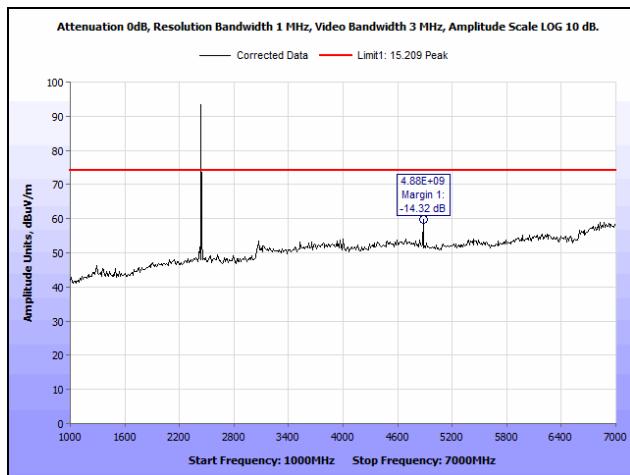
Plot 12. Radiated Harmonics, Low Channel, 2401 MHz, 7 GHz – 18 GHz, Peak



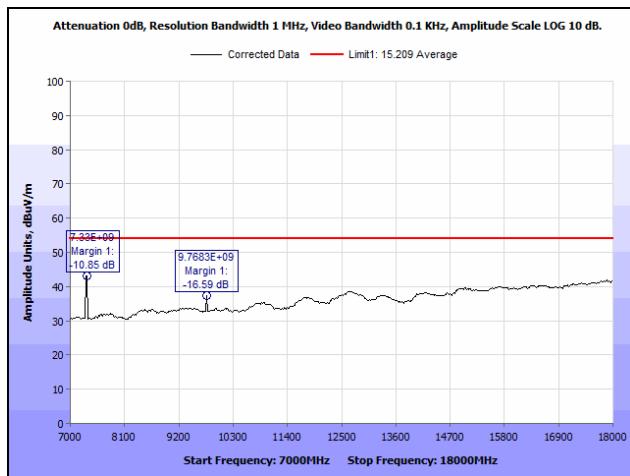
Plot 13. Radiated Harmonics, Mid Channel, 2440 MHz, 30 MHz – 1 GHz, Peak



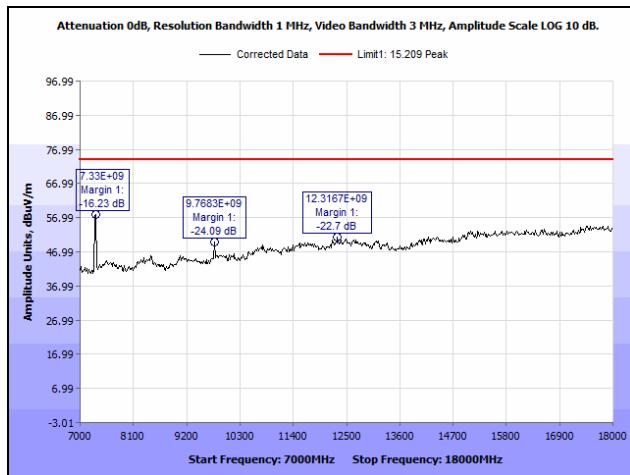
Plot 14. Radiated Harmonics, Mid Channel, 2440 MHz, 1 GHz – 7 GHz, Average



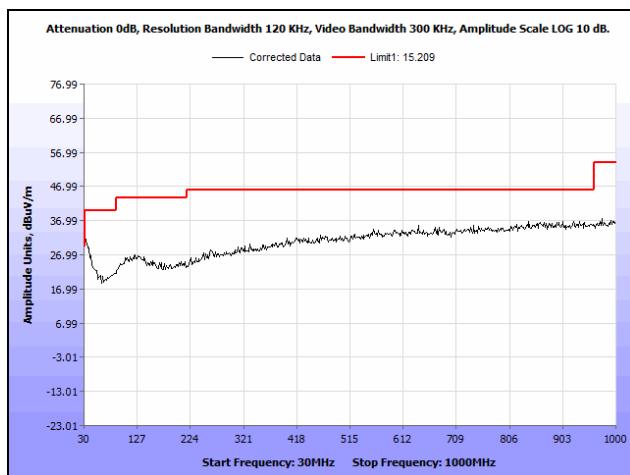
Plot 15. Radiated Harmonics, Mid Channel, 2440 MHz, 1 GHz – 7 GHz, Peak



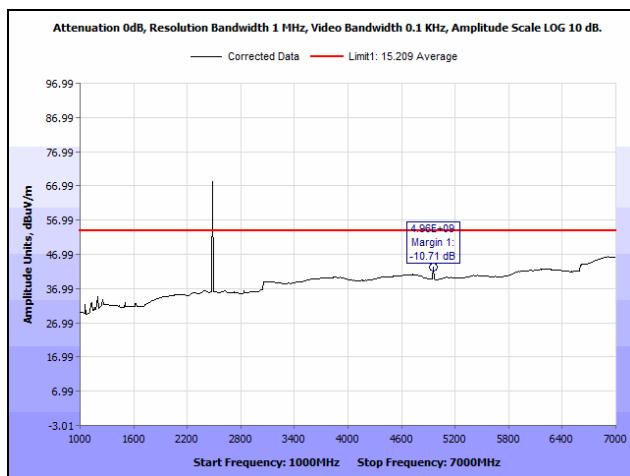
Plot 16. Radiated Harmonics, Mid Channel, 2440 MHz, 7 GHz – 18 GHz, Average



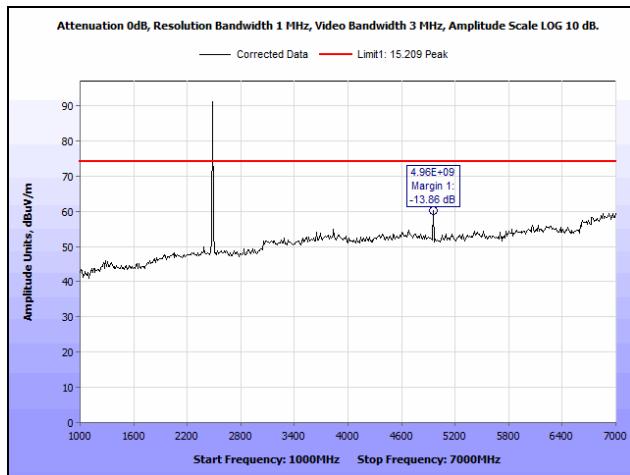
Plot 17. Radiated Harmonics, Mid Channel, 2440 MHz, 7 GHz – 18 GHz, Peak



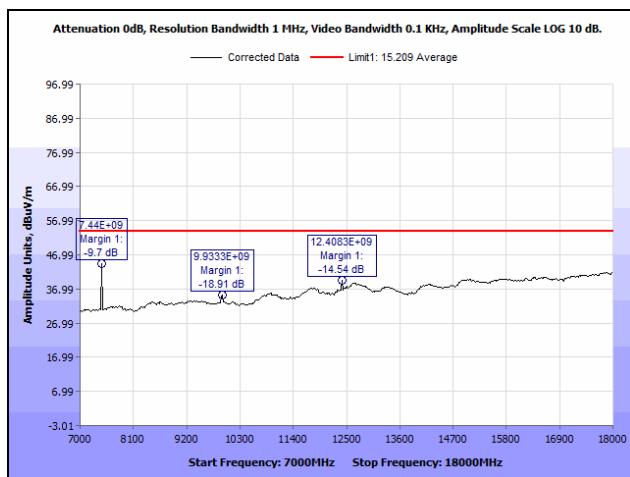
Plot 18. Radiated Harmonics, High Channel, 2481 MHz, 30 MHz – 1 GHz, Peak



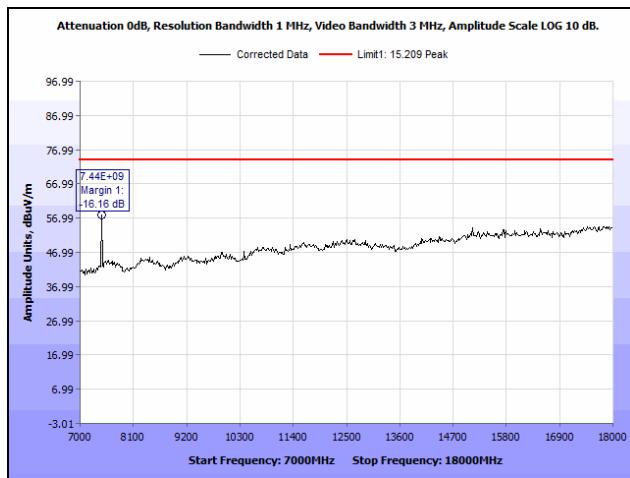
Plot 19. Radiated Harmonics, High Channel, 2481 MHz, 1 GHz – 7 GHz, Average



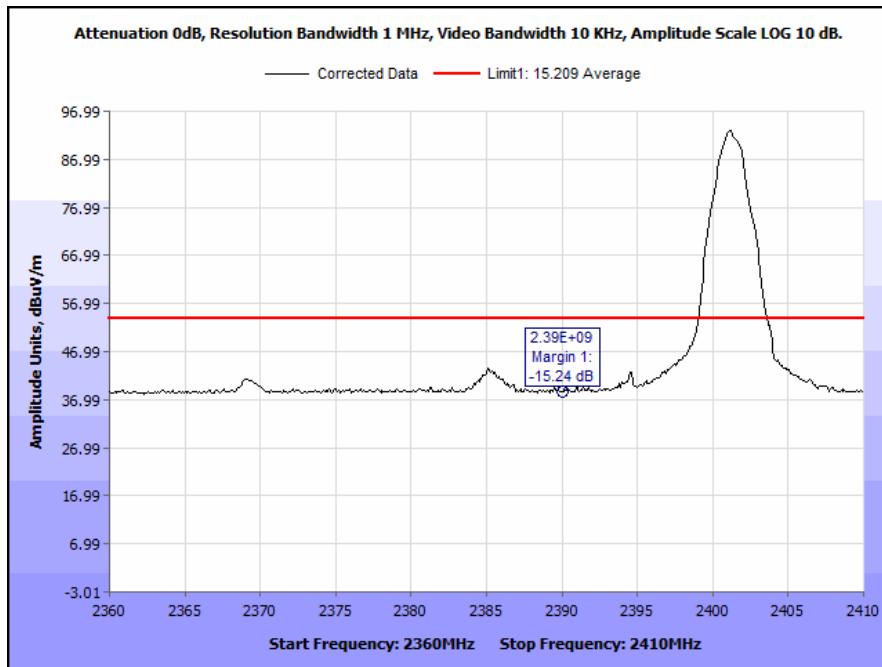
Plot 20. Radiated Harmonics, High Channel, 2481 MHz, 1 GHz – 7 GHz, Peak



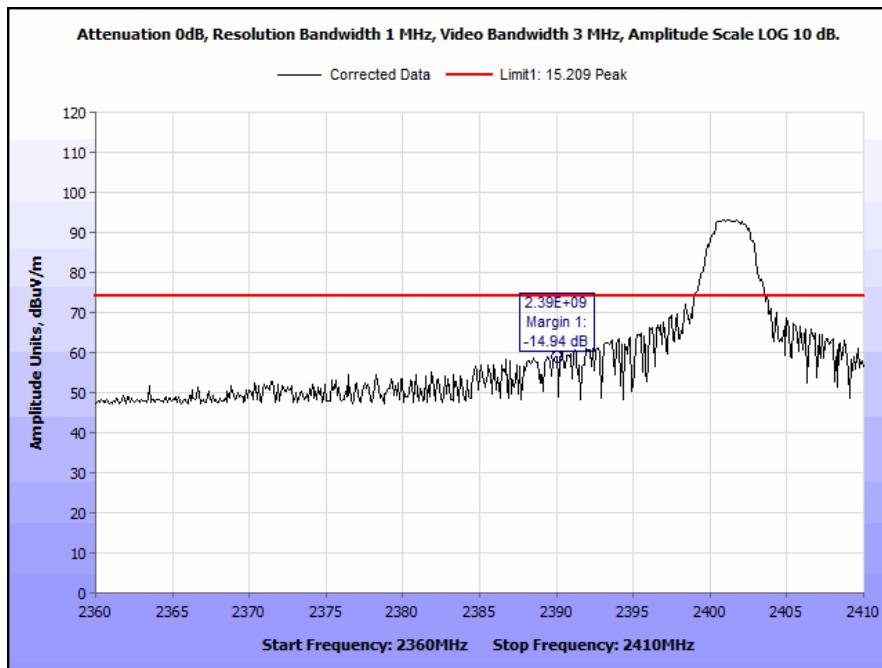
Plot 21. Radiated Harmonics, High Channel, 2481 MHz, 7 GHz – 18 GHz, Average



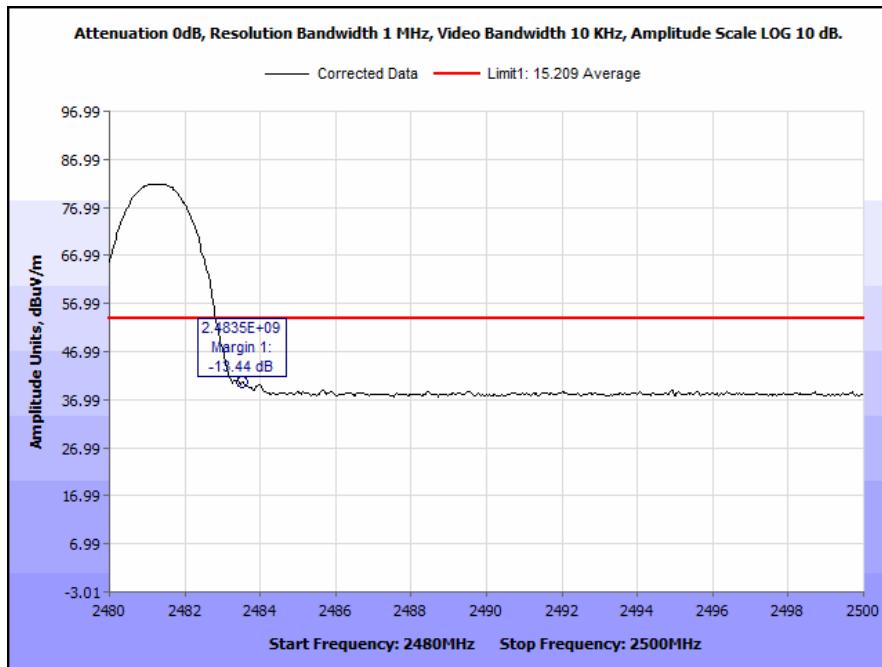
Plot 22. Radiated Harmonics, High Channel, 2481 MHz, 7 GHz – 18 GHz, Peak



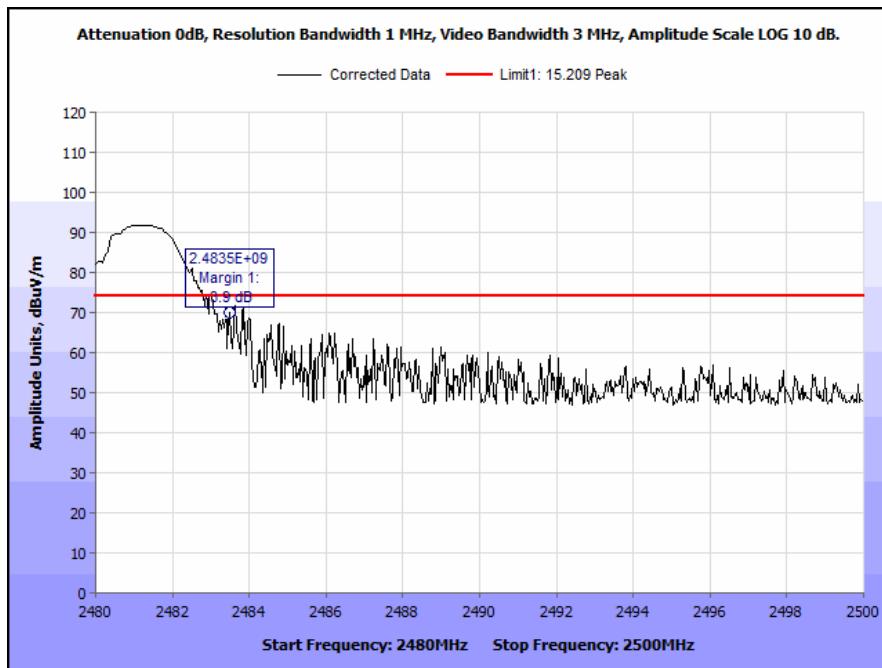
Plot 23. Radiated Band Edge, Low Channel, 2401 MHz at 2390 MHz Band Edge, Average



Plot 24. Radiated Band Edge, Low Channel, 2401 MHz at 2390 MHz Band Edge, Peak



Plot 25. Radiated Band Edge, High Channel, 2481 MHz at 2483.5 MHz Band Edge, Average



Plot 26. Radiated Band Edge, High Channel, 2481 MHz at 2483.5 MHz Band Edge, Peak

§ 15.249 Occupied Bandwidth

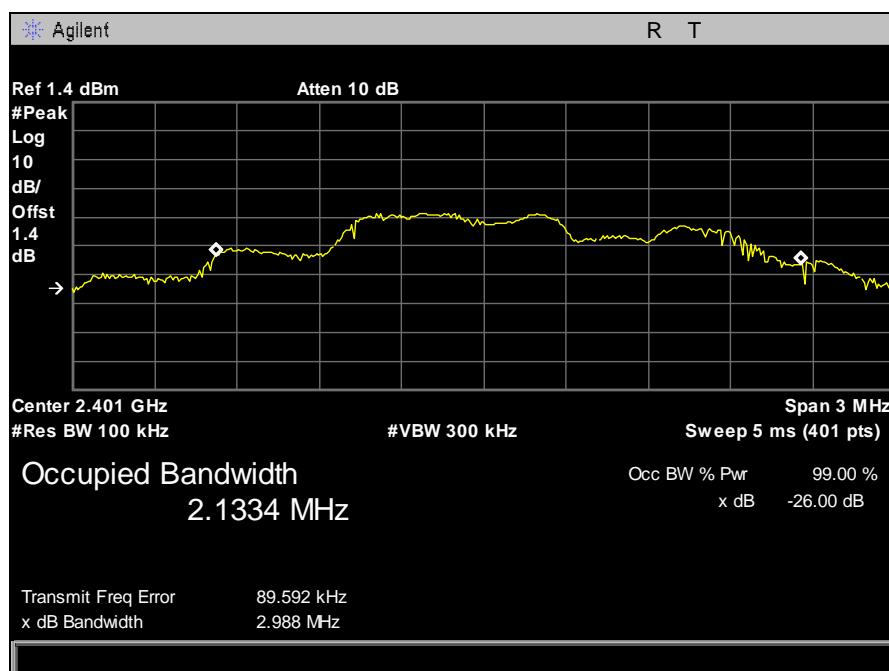
Test Requirements: § 15.249

Test Procedure: The EUT was placed inside the anechoic chamber and both -20dB and 99% occupied bandwidth were measured for all channels.

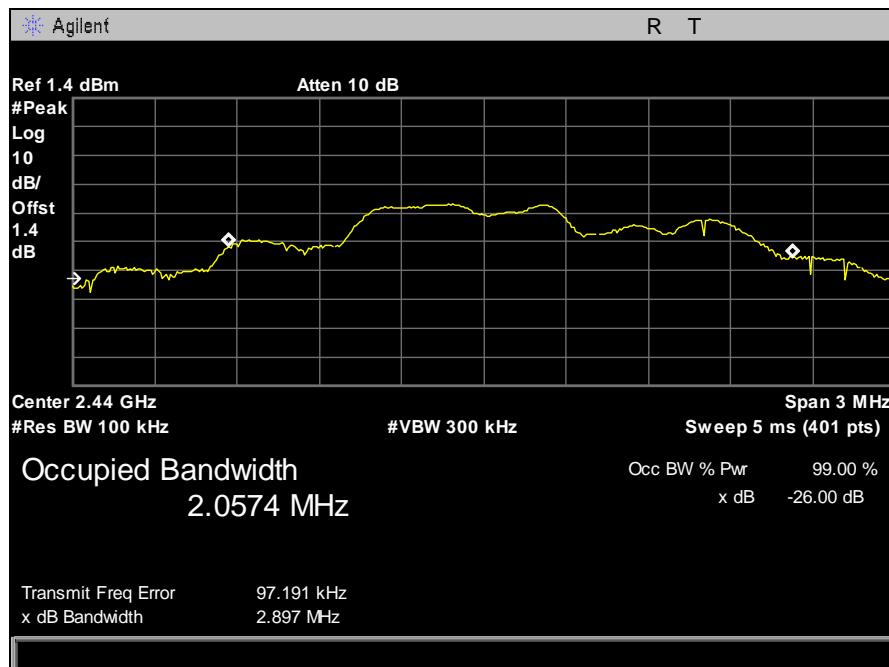
Test Results: The EUT is compliant with the requirements of § 15.249.

Test Engineer(s): Ajaz Khan

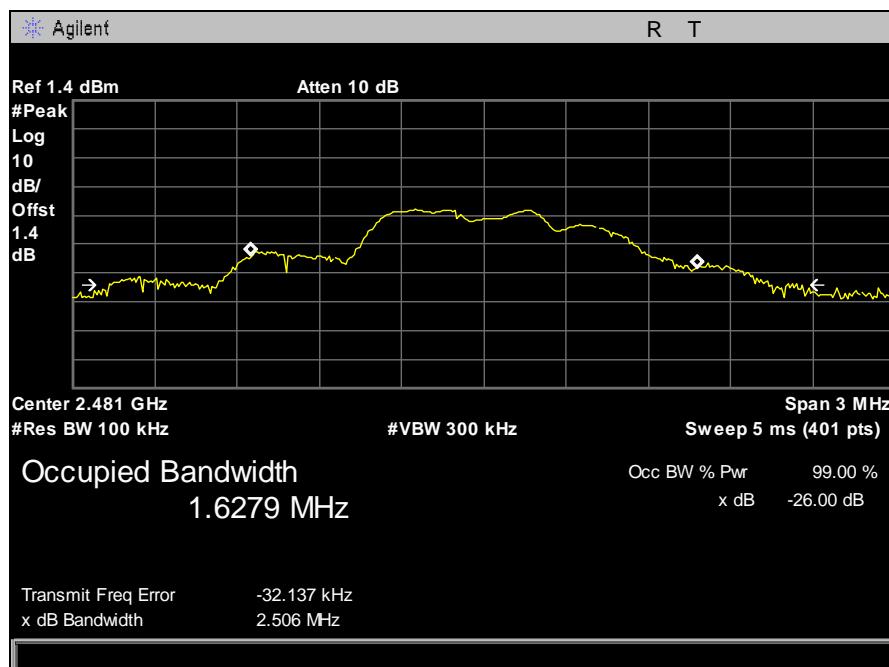
Test Date(s): 03/19/15



Plot 27. Occupied Bandwidth, Low Channel, 2401 MHz



Plot 28. Occupied Bandwidth, Mid Channel, 2440 MHz



Plot 29. Occupied Bandwidth, High Channel, 2481 MHz

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
1S3835	PSA SPECTRUM ANALYZER	AGILENT TECHNOLOGIES	E4447A	09/24/2013	09/24/2015
1S2421	EMI RECEIVER	ROHDE & SCHWARZ	ESIB7	09/05/2014	09/05/2015
1S2600	ANTENNA - BILOG	SUNOL SCIENCES	JB6	08/29/2013	08/29/2015
1S2603	ANTENNA; HORN	ETS-LINDGREN	3117	04/24/2013	04/24/2015
1S2482	5 METER CHAMBER (NSA)	PANASHIELD	5 METER SEMI-ANECHOIC CHAMBER	8/12/2013	2/12/2015
1S2121	PRE-AMPLIFIER, MICROWAVE	MITEQ	AFS42-01001800-30-10P	SEE NOTE	
N/A	NOTCH FILTER	MIRCRO-TRONICS	BRM50702	SEE NOTE	
N/A	HIGH PASS FILTER	MICRO-TRONICS	BRM50705	SEE NOTE	

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



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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.



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(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 stages; 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.



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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

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.



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ICES-003 Procedural & Labeling Requirements

From the Industry Canada Electromagnetic Compatibility Advisory Bulletin entitled, "Implementation and Interpretation of the Interference-Causing Equipment Standard for Digital Apparatus, ICES-003" (EMCAB-3, Issue 2, July 1995):

"At present, CISPR 22: 2002 and ICES technical requirements are essentially equivalent. Therefore, if you have CISPR 22: 2002 approval by meeting CISPR Publication 22, the only additional requirements are: to attach a note to the report of the test results for compliance, indicating that these results are deemed satisfactory evidence of compliance with ICES-003 of the Canadian Interference-Causing Equipment Regulations; to maintain these records on file for the requisite five year period; and to provide the device with a notice of compliance in accordance with ICES-003."

Procedural Requirements:

According to Industry Canada's Interference Causing Equipment Standard for Digital Apparatus ICES-003 Issue 4, February 2004:

Section 6.1: A record of the measurements and results, showing the date that the measurements were completed, shall be retained by the manufacturer or importer for a period of at least five years from the date shown in the record and made available for examination on the request of the Minister.

Section 6.2: A written notice indicating compliance must accompany each unit of digital apparatus to the end user. The notice shall be in the form of a label that is affixed to the apparatus. Where because of insufficient space or other constraints it is not feasible to affix a label to the apparatus, the notice may be in the form of a statement in the user's manual.

Labeling Requirements:

The suggested text for the notice, in English and in French, is provided below, from the Annex of ICES-003:

This Class ²] digital apparatus complies with Canadian ICES-003.

Cet appareil numérique de la classe ¹] est conforme à la norme NMB-003 du Canada.

² Insert either A or B but not both as appropriate for the equipment requirements.

End of Report