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TEST REPORT

Report No.: 14110700HKG-001

Metromile, Inc.

Application
For
Certification
(Original Grant)
(FCC ID: 2ADUV1)

Transceiver

Prepared and Checked by:

Approved by:

Signed On File
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Date: December 22, 2014

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GENERAL INFORMATION

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Manufacturer:	Dongguan Kwan Hong Electronics Co., Ltd.
Manufacturer Address:	KwanHong Building, Xiao Bian 2nd Industrial Zone, Chang An, Dongguan, China.
Brand Name:	Metromile Beacon
Model:	M1401
Type of EUT:	Transceiver
Description of EUT:	Beacon Transmitter
Serial Number:	N/A
FCC ID:	2ADUV1
Date of Sample Submitted:	November 18, 2014
Date of Test:	November 18, 2014 to November 26, 2014
Report No.:	14110700HKG-001
Report Date:	December 22, 2014
Environmental Conditions:	Temperature: +10 to 40°C Humidity: 10 to 90%

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SUMMARY OF TEST RESULT

TEST SPECIFICATION	REFERENCE	RESULTS
Radiated Emission Radiated Emission on the Bandedge	15.249	Pass
Radiated Emission in Restricted Bands	15.205	Pass
Digital Device Radiated Emissions	15.209	Pass

The equipment under test is found to be complying with the following standards:
FCC Part 15, October 1, 2013 Edition

- Note: 1. The EUT uses a permanently attached antenna which, in accordance to section 15.203, is considered sufficient to comply with the provisions of this section.
2. Pursuant to FCC part 15 Section 15.215(c), the 20 dB bandwidth of the emission was contained within the frequency band designated (mentioned as above) which the EUT operated. The effects, if any, from frequency sweeping, frequency hopping, other modulation techniques and frequency stability over excepted variations in temperature and supply voltage were considered.

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Table of Contents

1.0	<u>General Description</u>	1
1.1	Product Description	1
1.2	Related Submittal(s) Grants.....	1
1.3	Test Methodology	1
1.4	Test Facility	1
2.0	<u>System Test Configuration</u>	2
2.1	Justification.....	2
2.2	EUT Exercising Software.....	2
2.3	Special Accessories	2
2.4	Measurement Uncertainty.....	2
2.5	Support Equipment List and Description.....	2
3.0	<u>Emission Results</u>	3
3.1	Field Strength Calculation.....	3
3.2	Radiated Emission Configuration Photograph	4
3.3	Radiated Emission Data	4
4.0	<u>Equipment Photographs</u>	9
5.0	<u>Product Labelling</u>	9
6.0	<u>Technical Specifications</u>	9
7.0	<u>Instruction Manual</u>	9
8.0	<u>Miscellaneous Information</u>	10
8.1	Radiated Emission on the Bandedge.....	10
8.2	Discussion of Pulse Desensitization	13
8.3	Calculation of Average Factor.....	13
8.4	Emissions Test Procedures	16
9.0	<u>Confidentiality Request</u>	17
10.0	<u>Equipment List</u>	18

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1.0 General Description

1.1 Product Description

The Equipment Under Test (EUT) is a Beacon Transmitter which is placed inside a vehicle. The EUT broadcasts a Bluetooth BLE signal. The corresponding Metromile Apps program running in an IOS device (e.g. Apple iphone) uses this signal to know when the driver driving in the vehicle and records driving statistics and location data. The EUT can only support Bluetooth 4.0 BLE only. The Bluetooth portion occupies a frequency range of 2402MHz to 2480MHz (40 channels with channel spacing of 2MHz). The EUT is powered by a CR2032 3V Lithium battery.

Antenna Type: Internal, Integral

For electronic filing, the brief circuit description is saved with filename: descri.pdf.

1.2 Related Submittal(s) Grants

This is a single application for certification of a transceiver.

1.3 Test Methodology

Radiated emission measurements were performed according to the procedures in ANSI C63.4 (2009). All radiated measurements were performed in a 3m Chamber. Preliminary scans were performed in the 3m Chamber only to determine worst case modes. All radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the “**Justification Section**” of this Application.

1.4 Test Facility

The 3m Chamber used to collect the radiated data is located at Workshop No. 3, G/F., World-Wide Industrial Centre, 43-47 Shan Mei Street, Fo Tan, Sha Tin, N.T., Hong Kong. This test facility and site measurement data have been placed on file with the FCC.

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2.0 **System Test Configuration**

2.1 Justification

The system was configured for testing in a typical fashion (as a customer would normally use it), and in the confines as outlined in ANSI C63.4 (2009).

The device was powered by 3V CR2032 Lithium battery.

For maximizing emissions, the EUT was rotated through 360°, the antenna height was varied from 1 meter to 4 meters above the ground plane, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data reported in Exhibit 3.0.

The unit was operated standalone and placed in the center of the turntable.

The equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). The EUT was mounted to a plastic stand if necessary and placed on the wooden turntable, which enabled the engineer to maximize emissions through its placement in the three orthogonal axes.

2.2 EUT Exercising Software

There was no special software to exercise the device. Once the unit is powered up, it transmits the RF signal continuously.

2.3 Special Accessories

There are no special accessories necessary for compliance of this product.

2.4 Measurement Uncertainty

When determining of the test conclusion, the Measurement Uncertainty of test has been considered.

2.5 Support Equipment List and Description

N/A.

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3.0 Emission Results

Data is included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

3.1 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any), Average Factor (optional) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF + CF - AG - AV$$

where FS = Field Strength in dB μ V/m
 RA = Receiver Amplitude (including preamplifier) in dB μ V
 CF = Cable Attenuation Factor in dB
 AF = Antenna Factor in dB
 AG = Amplifier Gain in dB
 AV = Average Factor in dB

In the following table(s), the reading shown on the data table reflects the preamplifier gain. An example for the calculations in the following table is as follows:

$$FS = RR + LF$$

where FS = Field Strength in dB μ V/m
 RR = RA - AG - AV in dB μ V
 LF = CF + AF in dB

Assume a receiver reading of 52.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB are added. The amplifier gain of 29 dB and average factor of 5 dB are subtracted, giving a field strength of 27 dB μ V/m. This value in dB μ V/m was converted to its corresponding level in μ V/m.

RA = 52.0 dB μ V/m	
AF = 7.4 dB	RR = 18.0 dB μ V
CF = 1.6 dB	LF = 9.0 dB
AG = 29.0 dB	
AV = 5.0 dB	
FS = RR + LF	
FS = 18 + 9 = 27 dB μ V/m	

$$\text{Level in } \mu\text{V/m} = \text{Common Antilogarithm } [(27 \text{ dB}\mu\text{V/m})/20] = 22.4 \mu\text{V/m}$$

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3.2 Radiated Emission Configuration Photograph

The worst case in radiated emission was found at 38.004 MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: radiated photos.pdf.

3.3 Radiated Emission Data

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Judgment: Passed by 7.2 dB

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Applicant: Metromile, Inc.

Date of Test: November 26, 2014

Model: M1401

Worst-Case Operating Mode: Transmitting (Bluetooth 4.0 BLE)

Table 1

Radiated Emissions Pursuant to FCC Part 15 Section 15.249 Requirement

Lowest Channel

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Average Factor (dB)	Calculated at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
H	2402.000	103.4	33	29.4	99.8	44.4	55.4	94.0	-38.6
H	4804.000	55.9	33	34.9	57.8	44.4	13.4	54.0	-40.6
H	7206.000	45.9	33	37.9	50.8	44.4	6.4	54.0	-47.6
H	9608.000	45.4	33	40.4	52.8	44.4	8.4	54.0	-45.6
H	12010.000	46.1	33	40.5	53.6	44.4	9.2	54.0	-44.8
H	14412.000	46.8	33	40.0	53.8	44.4	9.4	54.0	-44.6

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
H	2402.000	103.4	33	29.4	99.8	114.0	-14.2
H	4804.000	55.9	33	34.9	57.8	74.0	-16.2
H	7206.000	45.9	33	37.9	50.8	74.0	-23.2
H	9608.000	45.4	33	40.4	52.8	74.0	-21.2
H	12010.000	46.1	33	40.5	53.6	74.0	-20.4
H	14412.000	46.8	33	40.0	53.8	74.0	-20.2

- NOTES:
1. Peak Detector is used for emission measurement.
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distances were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative sign in the column shows value below limit.
 4. Horn antenna is used for the emission over 1000MHz.
 5. For the measurement of radiated emission, summation method was used which numerical integrating (in terms of linear power) over the transmitter occupied bandwidth.
 6. For the linear power measurement, data in 1MHz spacing was collected by spectrum analyzer with 1MHz resolution bandwidth.
 7. Emission (the row indicated by **bold italic**) within the restricted band meets the requirement of FCC Part 15 Section 15.205.

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Applicant: Metromile, Inc.

Date of Test: November 26, 2014

Model: M1401

Worst-Case Operating Mode: Transmitting (Bluetooth 4.0 BLE)

Table 2

Radiated Emissions Pursuant to FCC Part 15 Section 15.249 Requirement

Middle Channel

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Average Factor (dB)	Calculated at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
H	2440.000	103.0	33	29.4	99.4	44.4	55.0	94.0	-39.0
H	4880.000	55.9	33	34.9	57.8	44.4	13.4	54.0	-40.6
H	7320.000	45.9	33	37.9	50.8	44.4	6.4	54.0	-47.6
H	9760.000	45.6	33	40.4	53.0	44.4	8.6	54.0	-45.4
H	12200.000	45.9	33	40.5	53.4	44.4	9.0	54.0	-45.0
H	14640.000	48.3	33	38.4	53.7	44.4	9.3	54.0	-44.7

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
H	2440.000	103.0	33	29.4	99.4	114.0	-14.6
H	4880.000	55.9	33	34.9	57.8	74.0	-16.2
H	7320.000	45.9	33	37.9	50.8	74.0	-23.2
H	9760.000	45.6	33	40.4	53.0	74.0	-21.0
H	12200.000	45.9	33	40.5	53.4	74.0	-20.6
H	14640.000	48.3	33	38.4	53.7	74.0	-20.3

- NOTES:
1. Peak Detector is used for emission measurement.
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distances were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative sign in the column shows value below limit.
 4. Horn antenna is used for the emission over 1000MHz.
 5. For the measurement of radiated emission, summation method was used which numerical integrating (in terms of linear power) over the transmitter occupied bandwidth.
 6. For the linear power measurement, data in 1MHz spacing was collected by spectrum analyzer with 1MHz resolution bandwidth.
 7. Emission (the row indicated by **bold italic**) within the restricted band meets the requirement of FCC Part 15 Section 15.205.

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Applicant: Metromile, Inc.

Date of Test: November 26, 2014

Model: M1401

Worst-Case Operating Mode: Transmitting (Bluetooth 4.0 BLE)

Table 3

Radiated Emissions Pursuant to FCC Part 15 Section 15.249 Requirement

Highest Channel

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Average Factor (dB)	Calculated at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
H	2480.000	102.4	33	29.4	98.8	44.4	54.4	94.0	-39.6
H	4960.000	55.7	33	34.9	57.6	44.4	13.2	54.0	-40.8
H	7440.000	45.9	33	37.9	50.8	44.4	6.4	54.0	-47.6
H	9920.000	45.8	33	40.4	53.2	44.4	8.8	54.0	-45.2
H	12400.000	46.1	33	40.5	53.6	44.4	9.2	54.0	-44.8
H	14880.000	48.2	33	38.4	53.6	44.4	9.2	54.0	-44.8

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
H	2480.000	102.4	33	29.4	98.8	114.0	-15.2
H	4960.000	55.7	33	34.9	57.6	74.0	-16.4
H	7440.000	45.9	33	37.9	50.8	74.0	-23.2
H	9920.000	45.8	33	40.4	53.2	74.0	-20.8
H	12400.000	46.1	33	40.5	53.6	74.0	-20.4
H	14880.000	48.2	33	38.4	53.6	74.0	-20.4

- NOTES:
1. Peak Detector is used for emission measurement.
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distances were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative sign in the column shows value below limit.
 4. Horn antenna is used for the emission over 1000MHz.
 5. For the measurement of radiated emission, summation method was used which numerical integrating (in terms of linear power) over the transmitter occupied bandwidth.
 6. For the linear power measurement, data in 1MHz spacing was collected by spectrum analyzer with 1MHz resolution bandwidth.
 7. Emission (the row indicated by **bold italic**) within the restricted band meets the requirement of FCC Part 15 Section 15.205.

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Applicant: Metromile, Inc.

Date of Test: November 26, 2014

Model: M1401

Worst-Case Operating Mode: Tx Other

Table 4

Radiated Emissions Pursuant to FCC Part 15 Section 15.209 Requirement

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-amp (dB)	Antenna Factor (dB)	Net at 3m (dBμV/m)	Limit at 3m (dBμV/m)	Margin (dB)
H	36.012	36.2	16	10.0	30.2	40.0	-9.8
H	38.004	38.8	16	10.0	32.8	40.0	-7.2
H	52.024	34.4	16	11.0	29.4	40.0	-10.6
H	56.402	35.4	16	11.0	30.4	40.0	-9.6
H	78.036	40.4	16	6.0	30.4	40.0	-9.6
H	80.528	40.8	16	6.0	30.8	40.0	-9.2

NOTES: 1. Peak Detector Data unless otherwise stated.

- All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distances were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
- Negative sign in the column shows value below limit.
- Emission (the row indicated by **bold italic**) within the restricted band meets the requirement of FCC Part 15 Section 15.205.

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4.0 **Equipment Photographs**

For electronic filing, the photographs are saved with filename: external photos.pdf and internal photos.pdf.

5.0 **Product Labelling**

For electronics filing, the FCC ID label artwork and the label location are saved with filename: label.pdf.

6.0 **Technical Specifications**

For electronic filing, the block diagram and schematic of the tested EUT are saved with filename: block.pdf and circuit.pdf respectively.

7.0 **Instruction Manual**

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf.

This manual will be provided to the end-user with each unit sold/leased in the United States.

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8.0 **Miscellaneous Information**

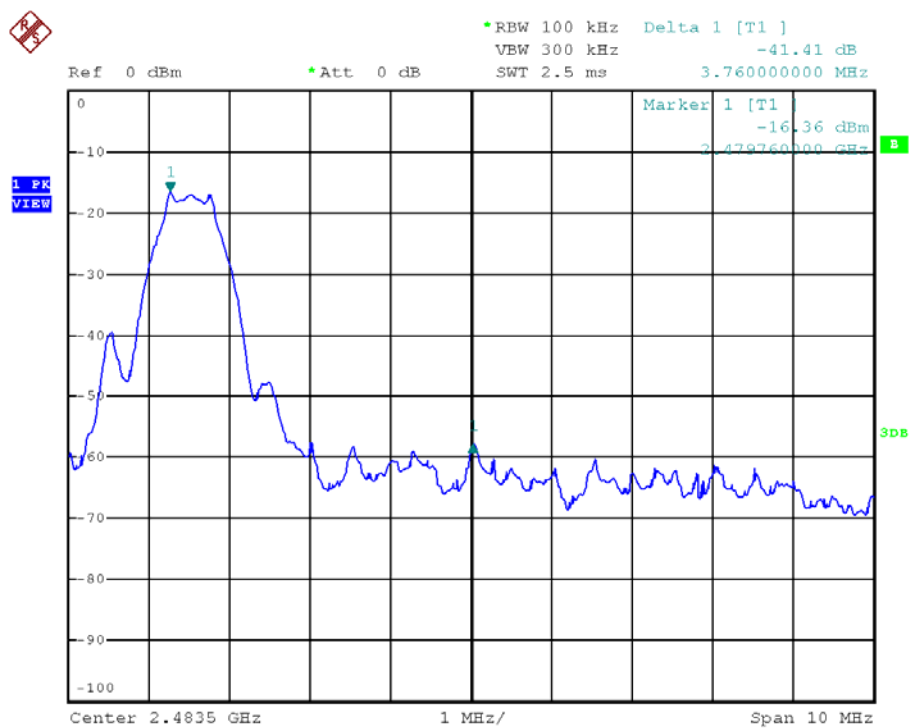
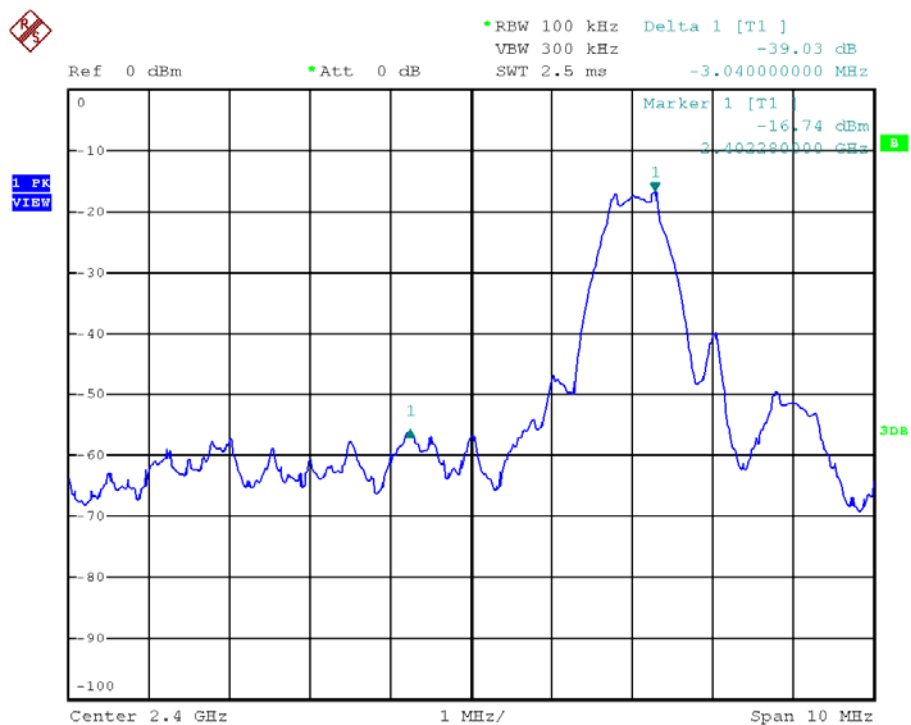
The miscellaneous information includes details of the test procedure and measured bandwidth / calculation of factor such as pulse desensitization and averaging factor.

8.1 Radiated Emission on the Bandedge

From the following plots, they show that the fundamental emissions are confined in the specified band (2400MHz to 2483.5MHz). In case of the fundamental emissions are within two standard bandwidths from the bandedge, the delta measurement technique is used for determining bandedge compliance. Standard bandwidth is the bandwidth specified by ANSI C63.4 (2009) for frequency being measured.

Emissions radiated outside of the specified frequency bands, except harmonics, are attenuated by 50dB below the level of the fundamental or to the general radiated emissions limits in Section 15.209, whichever is the lesser attenuation, which meet the requirement of part 15.249(d).

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Peak Measurement

Bandedge compliance is determined by applying marker-delta method, i.e. (Bandedge Plot).

Lower bandedge

Peak Resultant field strength = Fundamental emissions (peak value) – delta from the plot

$$=99.8\text{dB}\mu\text{V/m} - 39.0\text{ dB}$$

$$=60.8\text{ dB}\mu\text{V/m}$$

Average Resultant field strength = Fundamental emissions (average value) – delta from the plot

$$=55.4\text{dB}\mu\text{V/m} - 39.0\text{ dB}$$

$$=16.4\text{ dB}\mu\text{V/m}$$

Upper bandedge

Peak Resultant field strength = Fundamental emissions (peak value) – delta from the plot

$$=98.8\text{dB}\mu\text{V/m} - 41.4\text{ dB}$$

$$=57.4\text{ dB}\mu\text{V/m}$$

Average Resultant field strength = Fundamental emissions (average value) – delta from the plot

$$=54.4\text{ dB}\mu\text{V/m} - 41.4\text{ dB}$$

$$=13.0\text{ dB}\mu\text{V/m}$$

The resultant field strength meets the general radiated emission limit in Section 15.209, which does not exceed 74 dB μ V/m (Peak Limit) and 54 dB μ V/m (Average Limit).

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8.2 Discussion of Pulse Desensitization

Pulse desensitivity is not applicable for this device. The effective period (Teff) is approximately 0.6ms for a digital "1" bit which illustrated on technical specification, with a resolution bandwidth (3dB) of 3MHz, so the pulse desensitivity factor is 0dB.

8.3 Calculation of Average Factor

The duty cycle is simply the on-time divided by the period:

The duration of one cycle = 100ms

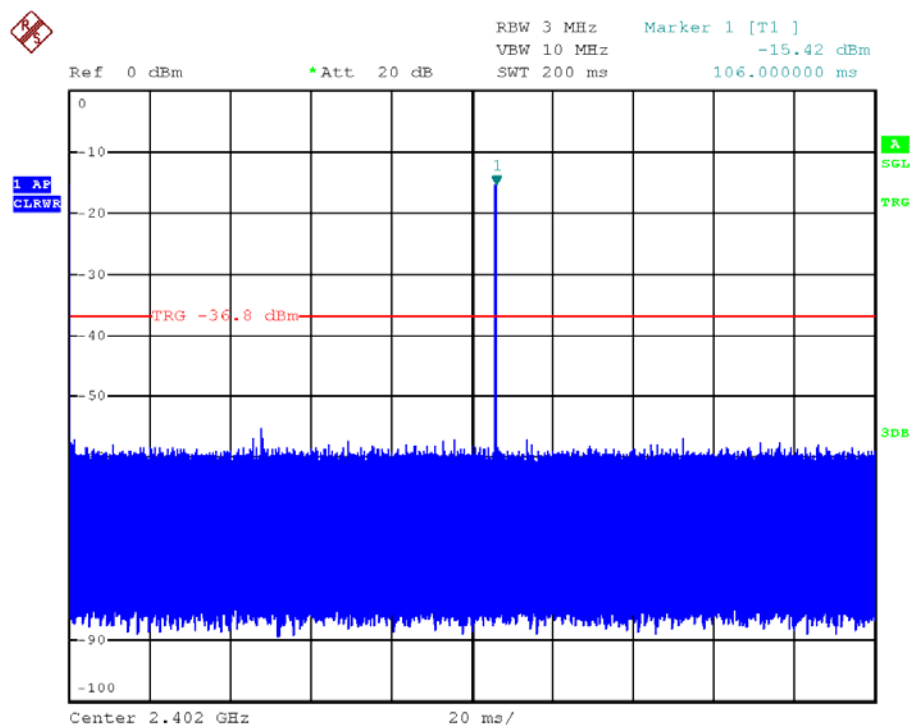
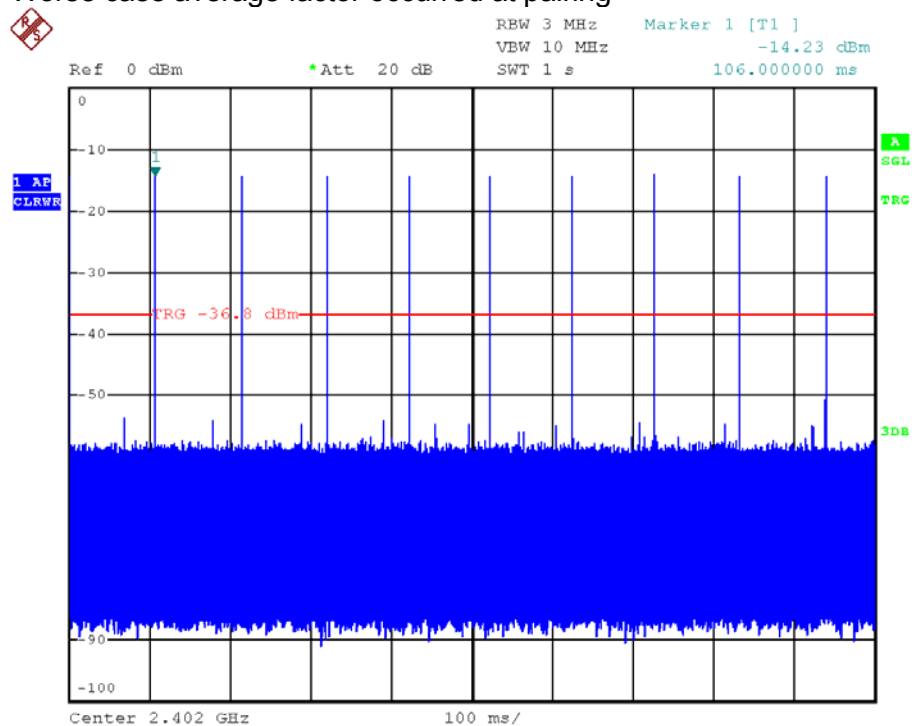
Effective period of the cycle = $0.3\text{ms} \times 2 = 0.6\text{ms}$

DC = $0.6\text{ms} / 100\text{ms} = 0.006$

Therefore, the averaging factor is found by $20\log 0.006 = -44.4\text{dB}$.

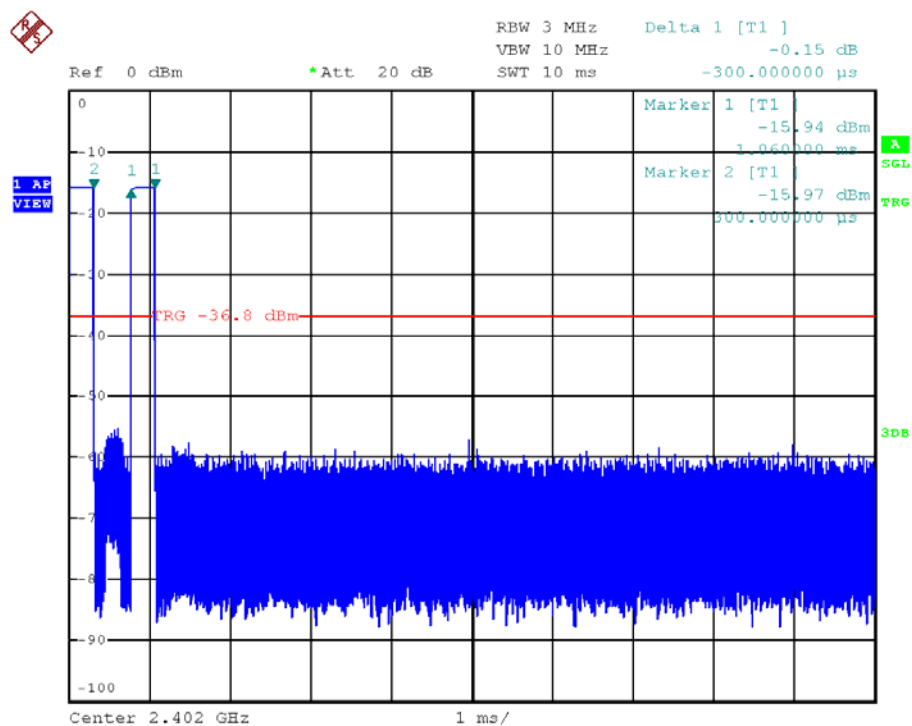
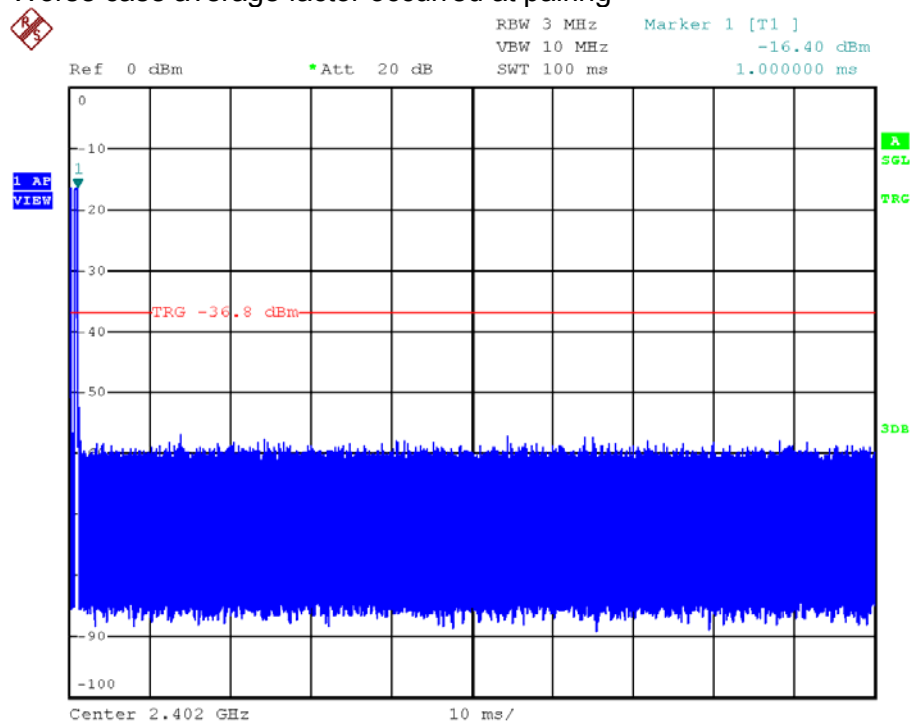
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Worse case average factor occurred at pairing



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Worse case average factor occurred at pairing



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8.4 Emissions Test Procedures

The following is a description of the test procedure used by Intertek Testing Services Hong Kong Ltd. in the measurements of transmitter operating under the Part 15, Subpart C rules.

The transmitting equipment under test (EUT) is placed on a wooden turntable which is four feet in diameter and approximately one meter in height above the ground plane. During the radiated emissions test, the turntable is rotated and any cables leaving the EUT are manipulated to find the configuration resulting in maximum emissions. The EUT is adjusted through all three orthogonal axis to obtain maximum emission levels. The antenna height and polarization are also varied during the testing to search for maximum signal levels. The height of the antenna is varied from one to four meters.

Detector function for radiated emissions is in peak mode. Average readings, when required, are taken by measuring the duty cycle of the equipment under test and subtracting the corresponding amount in dB from the measured peak readings. A detailed description for the calculation of the average factor can be found in Exhibit 8.3.

The frequency range scanned is from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or 40 GHz, whichever is lower.

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8.4 Emissions Test Procedures (cont'd)

The EUT is warmed up for 15 minutes prior to the test.

AC power to the unit is varied from 85% to 115% nominal and variation in the fundamental emission field strength is recorded. If battery powered, a new, fully charged battery is used.

Conducted measurements were made as described in ANSI C63.4 (2009).

The IF bandwidth used for measurement of radiated signal strength was 100 kHz or greater when frequency is below 1000 MHz. Where pulsed transmissions of short enough pulse duration warrant, a greater bandwidth is selected according to the recommendations of Hewlett Packard Application Note 150-2. A discussion of whether pulse desensitivity is applicable to this unit is included in this report (See Exhibit 8.1). Above 1000 MHz, a resolution bandwidth of 1 MHz is used.

Transmitter measurements are normally conducted at a measurement distance of three meters. However, to assure low enough noise floor in the forbidden bands and above 1 GHz, signals are acquired at a distance of one meter or less. All measurements are extrapolated to three meters using inverse scaling, unless otherwise reported. Measurements taken at a closer distance are so marked.

9.0 **Confidentiality Request**

For electronic filing, a preliminary copy of the confidentiality request is saved with filename: request.pdf.

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10.0 Equipment List

1) Radiated Emissions Test

Equipment	EMI Test Receiver	Biconical Antenna	Log Periodic Antenna
Registration No.	EW-2666	EW-0571	EW-0572
Manufacturer	R&S	EMCO	EMCO
Model No.	ESCI7	3104C	3146
Calibration Date	Jun. 20, 2013	Nov. 01, 2013	Jun. 26, 2013
Calibration Due Date	Dec. 20, 2014	May 01, 2015	Dec. 26, 2014

Equipment	Spectrum Analyzer	Pyramidal Horn Antenna	Double Ridged Guide Antenna
Registration No.	EW-2253	EW-0905	EW-1015
Manufacturer	R&S	EMCO	EMCO
Model No.	FSP40	3160-09	3115
Calibration Date	May 08, 2014	Jan. 28, 2014	Oct. 28, 2014
Calibration Due Date	May 08, 2015	Jul. 28, 2015	Apr. 28, 2016

2) Bandedge Measurement

Equipment	Spectrum Analyzer
Registration No.	EW-2249
Manufacturer	R&S
Model No.	FSP30
Calibration Date	Nov. 19, 2014
Calibration Due Date	Nov. 19, 2015

END OF TEST REPORT