



# FCC PART 15, SUBPART C IC RSS-247, ISSUE 1, MAY 2015

## TEST AND MEASUREMENT REPORT

For

### Dash Robotics

3942 Trust Way, Hayward, CA 94545, USA

**FCC ID: 2AF5B-KRB0001  
IC: 20708-KRB0001**

<b>Report Type:</b> Original Report	<b>Product Type:</b> Bluetooth Robot Controller
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**Note:** This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA\*, NIST, or any agency of the Federal Government.

\* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk “\*” (Rev.2)

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## DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1509284-247	Initial	2015-10-14

## 1 General Description

### 1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Dash Robotics.*, and their product model: *KRB0001*, FCC ID: 2AF5B- KRB0001; IC: 20708-KRB0001 or the “EUT” as referred to in this report. The EUT is a robot controller for Dash Robotics robot kits, which includes the BLE technology.

### 1.2 Mechanical Description of EUT

The EUT measures approximately 11.2 cm (L) x 2.6 cm (W) x 3.6 cm (H) and weighs 26g.

*The test data gathered are from typical production sample, serial number: R1509284-1 assigned by BACL.*

### 1.3 Objective

This report is prepared on behalf of *Dash Robotics.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and IC RSS-247 Issue 1, May 2015.

The objective is to determine compliance with FCC Part 15.247 and IC RSS-247 rules for Output Power, Antenna Requirements, 6 dB Bandwidth, Power spectral density, 100 kHz Bandwidth of Band Edges Measurement, Conducted and Radiated Spurious Emissions.

### 1.4 Related Submittal(s)/Grant(s)

N/A

### 1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v03r03: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247

### 1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Based on CISPR16-4-2:2011, The Treatment of Uncertainty in EMC Measurements, the values ranging from  $\pm 2.0$  dB for Conducted Emissions tests and  $\pm 4.0$  dB for Radiated Emissions tests are the most accurate estimates pertaining to uncertainty of EMC measurements at BACL Corp.

## 1.7 Test Facility

Bay area compliance Laboratories Corp. (BACL) is:

1- An independent Commercial Test Laboratory accredited to **ISO 17025: 2005** by **A2LA**, in the fields of: Electromagnetic Compatibility & Telecommunications covering Emissions, Immunity, Radio, RF Exposure, Safety and Telecom. This includes NEBS (Network Equipment Building System), Wireless RF, Telecommunications Terminal Equipment (TTE); Network Equipment; Information Technology Equipment (ITE); Medical Electrical Equipment; Industrial, Commercial, and Medical Test Equipment; Professional Audio and Video Equipment; Electronic (Digital) Products; Industrial and Scientific Instruments; Cabled Distribution Systems and Energy Efficiency Lighting.

2- An ENERGY STAR Recognized Laboratory, for the LM80 Testing, a wide variety of Luminaires and Computers.

3- A NIST Designated Phase-I and Phase-II CAB including: ACMA (Australian Communication and Media Authority), BSMI (Bureau of Standards, Metrology and Inspection of Taiwan), IDA (Infocomm Development Authority of Singapore), IC(Industry Canada), Korea ( Ministry of Communications Radio Research Laboratory), NCC (Formerly DGT; Directorate General of Telecommunication of Chinese Taipei) OFTA (Office of the Telecommunications Authority of Hong Kong), Vietnam, VCCI - Voluntary Control Council for Interference of Japan and a designated EU CAB (Conformity Assessment Body) (Notified Body) for the EMC and R&TTE Directives.

4- A Product Certification Body accredited to **ISO Guide 65: 1996** by **A2LA** to certify:

2. Radio Standards Specifications (RSS) in the Category I Equipment Standards List and All Broadcasting Technical Standards (BETS) in Category I Equipment Standards List for Industry Canada.

3. Radio Communication Equipment for Singapore.

4. Radio Equipment Specifications, GMDSS Marine Radio Equipment Specifications, and Fixed Network Equipment Specifications for Hong Kong.

5. Japan MIC Telecommunication Business Law (A1, A2) and Radio Law (B1, B2 and B3).

6. Audio/Video, Battery Charging Systems, Computers, Displays, Enterprise Servers, Imaging Equipment, Set-Top Boxes, Telephony, Televisions, Ceiling Fans, CFLs (Including GU24s),Decorative Light Strings, Integral LED Lamps, Luminaires, Residential Ventilating Fans.

The test site used by BACL Corp. to collect radiated and conducted emissions measurement data is located at its facility in Sunnyvale, California, USA.

The test site at BACL Corp. has been fully described in reports submitted to the Federal Communication Commission (FCC) and Voluntary Control Council for Interference (VCCI). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on February 11 and December 10, 1997, and Article 8 of the VCCI regulations on December 25, 1997. The test site also complies with the test methods and procedures set forth in CISPR 22:2008 §10.4 for measurements below 1 GHz and §10.6 for measurements above 1 GHz as well as ANSI C63.4-2014, ANSI C63.4-2014, TIA/EIA-603 & CISPR 24:2010.

The Federal Communications Commission and Voluntary Control Council for Interference have the reports on file and they are listed under FCC registration number: 90464 and VCCI Registration No.: A-0027. The test site has been approved by the FCC and VCCI for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, BACL Corp. is an American Association for Laboratory Accreditation (A2LA) accredited laboratory (Lab Code 3297-02). The current scope of accreditations can be found at

<http://www.a2la.org/scopepdf/3297-02.pdf?CFID=1132286&CFTOKEN=e42a3240dac3f6ba-6DE17DCB-1851-9E57-477422F667031258&jsessionid=8430d44f1f47cf2996124343c704b367816b>

## 2 System Test Configuration

### 2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v03r03.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

### 2.2 EUT Exercise Software

The software that ran on EUT is nRFgo Studio, provided by *Dash Robotics*, and was verified by Jin Yang to comply with the standard requirements being tested against.

### 2.3 Equipment Modifications

No modifications were made to the EUT.

### 2.4 Local Support Equipment

Manufacturer	Description	Model
DELL	Laptop	Latitude E6530

### 2.5 EUT Internal Configuration Details

N/A

### 2.6 Power Supply and Line Filters

Description	Detail	Model
Rechargeable Battery	DC 3.7V 250mAh	SDL601235

### 2.7 Interface Ports and Cabling

N/A

### 3 Summary of Test Results

Results reported relate only to the product tested.

FCC & IC Rules	Description of Test	Results
FCC §15.203 IC RSS-Gen §8.3	Antenna Requirement	Compliant
FCC §15.207(a) IC RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
FCC §15.247(i) IC RSS-102	RF Exposure	Compliant
FCC §15.247 (d) IC RSS-247 §5.5	Spurious Emissions at Antenna Port	Compliant
FCC §15.205 IC RSS-Gen §8.10	Restricted Bands	Compliant
FCC §15.209, §15.247(d) IC RSS-247 §5.5, RSS-Gen §8.9	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) IC RSS-247 §5.2 IC RSS-Gen §6.6	6 dB & 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) IC RSS-247 §5.4	Maximum Peak Output Power	Compliant
FCC §15.247(d) IC RSS-247 §5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §15.247(e) IC RSS-247 §5.2	Power Spectral Density	Compliant

## 4 FCC §15.203 & IC RSS-Gen §8.3 - Antenna Requirements

### 4.1 Applicable Standards

According to FCC §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.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to IC RSS-Gen §8.3: Transmitter Antenna

The applicant for equipment certification, as per RSP-100, must provide a list of all antenna types that may be used with the licence-exempt transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna.

Licence-exempt transmitters that have received equipment certification may operate with different types of antennas. However, it is not permissible to exceed the maximum equivalent isotropically radiated power (e.i.r.p.) limits specified in the applicable standard (RSS) for the licence-exempt apparatus.

Testing shall be performed using the highest gain antenna of each combination of licence-exempt transmitter and antenna type, with the transmitter output power set at the maximum level. 9 When a measurement at the antenna connector is used to determine RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna manufacturer.

User manuals for transmitters equipped with detachable antennas shall also contain the following notice in a conspicuous location:

This radio transmitter (identify the device by certification number) has been approved by Industry Canada to operate with the antenna types listed below with the maximum permissible gain indicated. Antenna types not included in this list, having a gain greater than the maximum gain indicated for that type, are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types approved for use with the transmitter, indicating the maximum permissible antenna gain (in dBi).

### 4.2 Antenna Description

Antenna Type	Antenna Gain (dBi) @ 2.4 GHz
PCB Trace	-6.0

## 5 FCC §15.247(i) & IC RSS-102 - RF Exposure

### 5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Averaging Time (minutes)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* (180/f <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

Before equipment certification is granted, the procedure of IC RSS-102 must be followed concerning the exposure of humans to RF field

According to IC RSS-102 Issue 5:

### 2.5.2 Exemption Limits for Routine Evaluation – RF Exposure Evaluation

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz<sup>6</sup> and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $4.49/f^{0.5}$  W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than  $1.31 \times 10^{-2} f^{0.6834}$  W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

## 5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

## 5.3 MPE Results

<u>Maximum peak output power at antenna input terminal (dBm):</u>	<u>-5.51</u>
<u>Maximum peak output power at antenna input terminal (mW):</u>	<u>0.2812</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2402</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>-6.0</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>0.251</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm<sup>2</sup>):</u>	<u>1.406E-04</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm<sup>2</sup>):</u>	<u>1.0</u>

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 1.406E-04 mW/cm<sup>2</sup>. Limit is 1.0 mW/cm<sup>2</sup>.

RF exposure evaluation exemption for IC:

$$-5.51 \text{ dBm} - 6 \text{ dBi} = -11.51 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 2.6764 \text{ W} = 34.2755 \text{ dBm}$$

Therefore the RF exposure is not required.

## 6 FCC §15.207 & IC RSS-Gen §8.8 - AC Line Conducted Emissions

### 6.1 Applicable Standards

As per FCC §15.207 and IC RSS-Gen §8.8 Conducted limits:

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50  $\mu$ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

Frequency of Emission (MHz)	Conducted Limit (dBuV)	
	Quasi-Peak	Average
0.15-0.5	66 to 56 <sup>Note</sup>	56 to 46 <sup>Note</sup>
0.5-5	56	46
5-30	60	50

*Note: Decreases with the logarithm of the frequency.*

### 6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used was FCC §15.207 and IC RSS-Gen §8.8 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

The AC/DC power adapter of the EUT was connected with LISN-1 which provided 120 V / 60 Hz AC power.

### 6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cord of the support equipment was connected to LISN-2.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data was recorded in the peak detection mode, quasi-peak and average. Quasi-Peak readings are distinguished with a “QP.” Average readings are distinguished with an “Ave”.

## 6.4 Corrected Amplitude & Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Cable Loss (CL), the Attenuator Factor (Atten) to indicated Amplitude (Ai) reading. The basic equation is as follows:

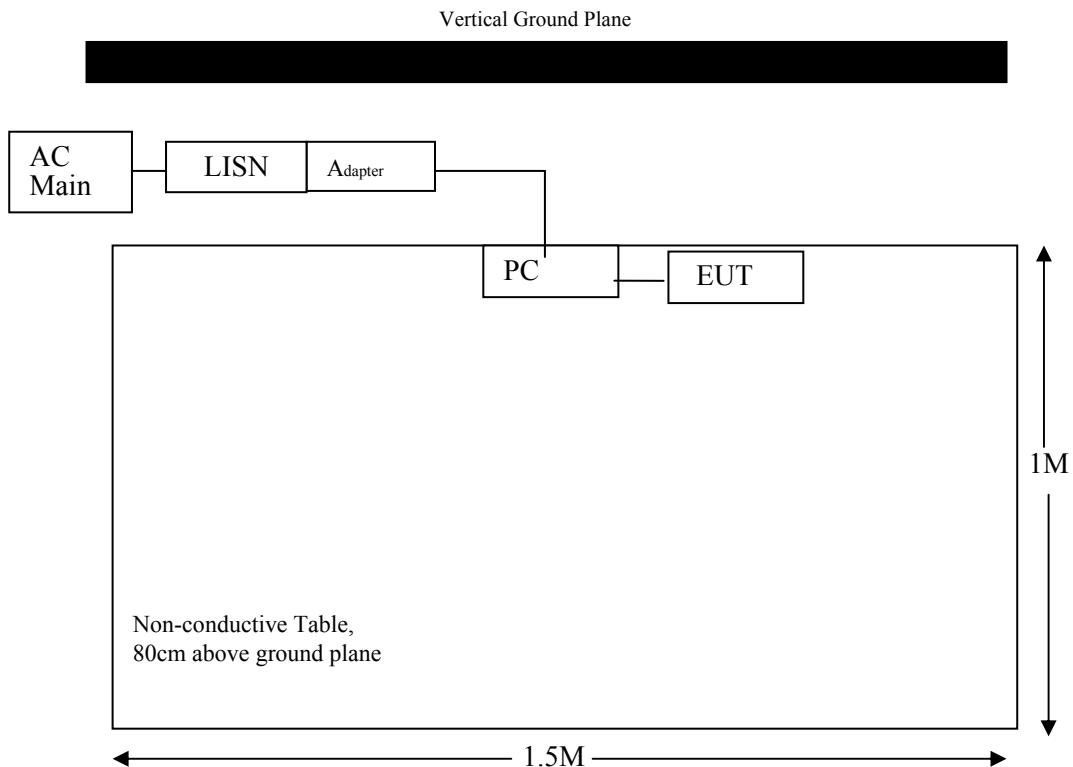
$$CA = Ai + CL + Atten$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 dB) + Attenuator (10 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

## 6.5 Test Setup Block Diagram



## 6.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100337	2015-09-28	1 year
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2015-04-17	1 year
TTE	Filter, High Pass	H962-150k-50-21378	K7133	2015-01-30	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	2015-03-05	1 year
Hewlett-Packard	5 ft RF cable	-	1268	2015-07-29	1 year

**Statement of Traceability:** *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

## 6.7 Test Environmental Conditions

Temperature:	23 °C
Relative Humidity:	42 %
ATM Pressure:	102.8 kPa

The testing was performed by Jim yang on 2015-10-07 in 10m chamber.

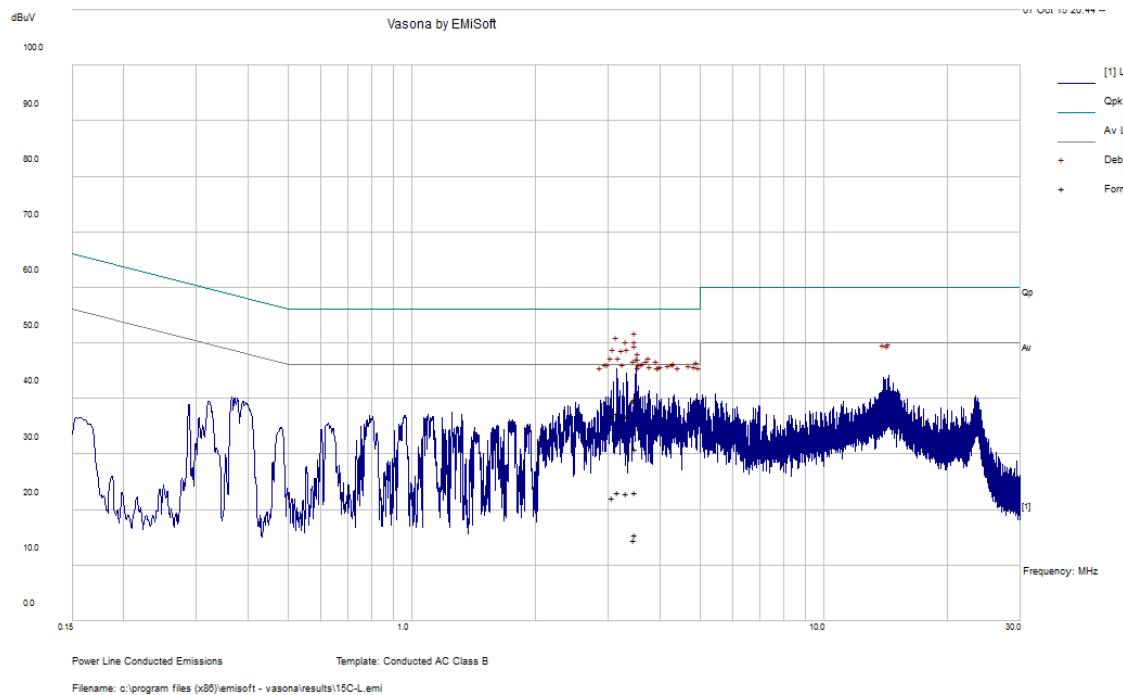
## 6.8 Summary of Test Results

According to the recorded data in following table, the EUT complied with the FCC 15C and IC RSS-Gen standard's conducted emissions limits, with the margin reading of:

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-16.05	3.496494	Line	0.15-30

## 6.9 Conducted Emissions Test Plots and Data

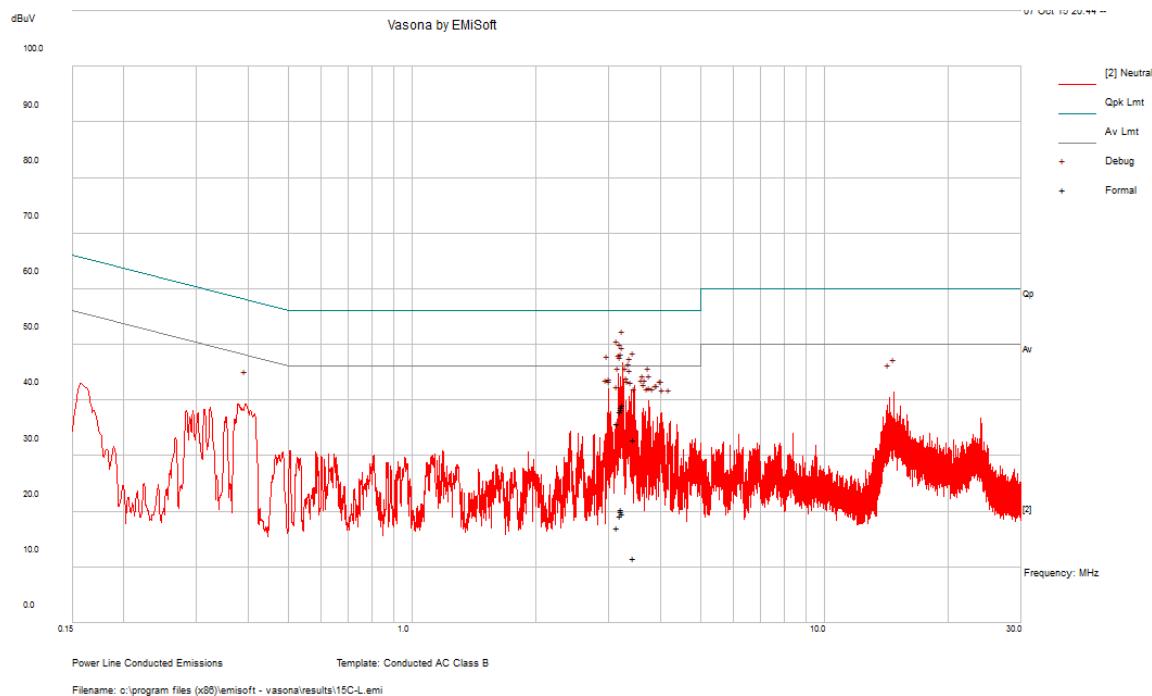
### 120 V, 60 Hz – Line



Frequency (MHz)	Corrected Amplitude (dB $\mu$ V)	Conductor (Line/Neutral)	Limit (dB $\mu$ V)	Margin (dB)	Detector (QP/Ave.)
3.496494	39.95	Line	56	<b>-16.05</b>	QP
3.16571	37.35	Line	56	-18.65	QP
3.31664	36.84	Line	56	-19.16	QP
3.473452	39.44	Line	56	-16.56	QP
3.491053	31.03	Line	56	-24.97	QP
3.077769	37.08	Line	56	-18.92	QP

Frequency (MHz)	Corrected Amplitude (dB $\mu$ V)	Conductor (Line/Neutral)	Limit (dB $\mu$ V)	Margin (dB)	Detector (QP/Ave.)
3.496494	23.15	Line	46	-22.85	Ave.
3.16571	23.08	Line	46	-22.92	Ave.
3.31664	22.92	Line	46	-23.08	Ave.
3.473452	14.53	Line	46	-31.47	Ave.
3.491053	15.44	Line	46	-30.56	Ave.
3.077769	22.11	Line	46	-23.89	Ave.

## 120 V, 60 Hz – Neutral



Frequency (MHz)	Corrected Amplitude (dB $\mu$ V)	Conductor (Line/Neutral)	Limit (dB $\mu$ V)	Margin (dB)	Detector (QP/Ave.)
3.222858	38.69	Neutral	56	-17.31	QP
3.149129	35.84	Neutral	56	-20.16	QP
3.205326	37.96	Neutral	56	-18.04	QP
3.243495	39.11	Neutral	56	-16.89	QP
3.448486	32.82	Neutral	56	-23.18	QP
3.220369	38.42	Neutral	56	-17.58	QP

Frequency (MHz)	Corrected Amplitude (dB $\mu$ V)	Conductor (Line/Neutral)	Limit (dB $\mu$ V)	Margin (dB)	Detector (QP/Ave.)
3.222858	20.35	Neutral	46	-25.65	Ave.
3.149129	17.09	Neutral	46	-28.91	Ave.
3.205326	19.28	Neutral	46	-26.72	Ave.
3.243495	19.54	Neutral	46	-26.46	Ave.
3.448486	11.56	Neutral	46	-34.44	Ave.
3.220369	20.09	Neutral	46	-25.91	Ave.

## 7 FCC §15.209, §15.247(d) & IC RSS-247 §5.5, RSS-Gen §8.9 - Spurious Emissions

### 7.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As per FCC §15.209(a) and RSS-247: Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

\*\* Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.247 (d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. 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)).

As per IC RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

**Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz**

Frequency (MHz)	Field Strength (μv/m at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

\* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for licence-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per IC RSS-247 §5.5, 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(4), 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.

## 7.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and IC RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

## 7.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all Installation combinations.

The EUT is set 3 meter away from the testing antenna, which is varied from 1-4 meter, and the EUT is placed on a turntable, which is 0.8 meter above ground plane, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak:  $\text{RBW} = 1\text{MHz} / \text{VBW} = 1\text{MHz} / \text{Sweep} = \text{Auto}$
- (2) Average:  $\text{RBW} = 1\text{MHz} / \text{VBW} = 10\text{Hz} / \text{Sweep} = \text{Auto}$

## 7.4 Corrected Amplitude & Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$\text{CA} = \text{Ai} + \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

## 7.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100337	2015-06-18	1 year
Agilent	Spectrum Analyzer	E4440A	MY44303352	2014-10-16	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Science Corp	Combination Antenna	JB3	A020106-2	2015-07-11	2 year
EMCO	Horn Antenna	3115	9511-4627	2014-10-17	1 year
Hewlett Packard	Pre-amplifier	8447D	2944A10187	2015-03-20	1 year
WiseWave	Horn Antenna	ARH-4223-02	10555-01	2014-08-09	3 Years
Suirong	30 ft conductive emission cable	LMR 400	-	2015-03-05	1 year
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A
IW Microwave	AOBOR Hi frequency Cable	DC 1531	KPS-1501A3960KPS	2015-08-10	1 year
Hewlett-Packard	5 ft N-type RF cable	-	1268	2015-05-15	1 year
Agilent	Pre-amplifier	8449B	3008A01978	2015-03-11	1 year

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** BACL attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.

## 7.6 Test Environmental Conditions

<b>Temperature:</b>	22 °C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 kPa

The testing was performed by Jin Yang on 2015-10-09 in 5m chamber 3.

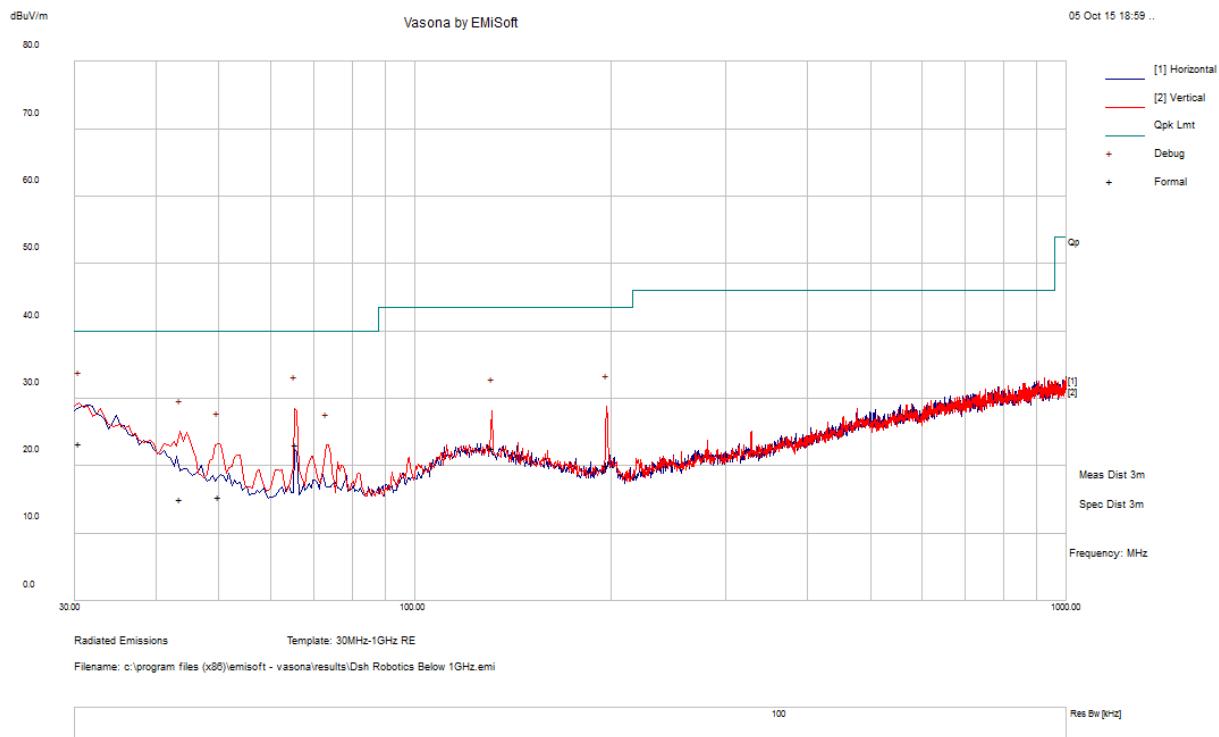
## 7.7 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and IC RSS-247 standard's radiated emissions limits, and had the worst margin of:

<b>Mode: Transmitting</b>			
<b>Margin (dB)</b>	<b>Frequency (MHz)</b>	<b>Polarization (Horizontal/Vertical)</b>	<b>Range</b>
-0.44	7206	Vertical	30 MHz – 25 GHz

## 7.8 Radiated Emissions Test Results

### 1) 30 MHz – 1 GHz, Measured at 3 meters



Frequency (MHz)	Corrected Amplitude (dB $\mu$ V/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dB $\mu$ V/m)	Margin (dB)
30.5245	23.41	137	V	188	40	-16.59
43.57675	15.13	204	V	273	40	-24.87
49.919	15.46	152	V	259	40	-24.54
65.6405	23.24	276	V	334	40	-16.76
131.2928	22.74	144	V	174	43.5	-20.76
196.967	20.25	196	V	195	43.5	-23.25

Note: 2.4 GHz BLE, High Channel, Quasi-Peak Measurements @ 3m, worst case.

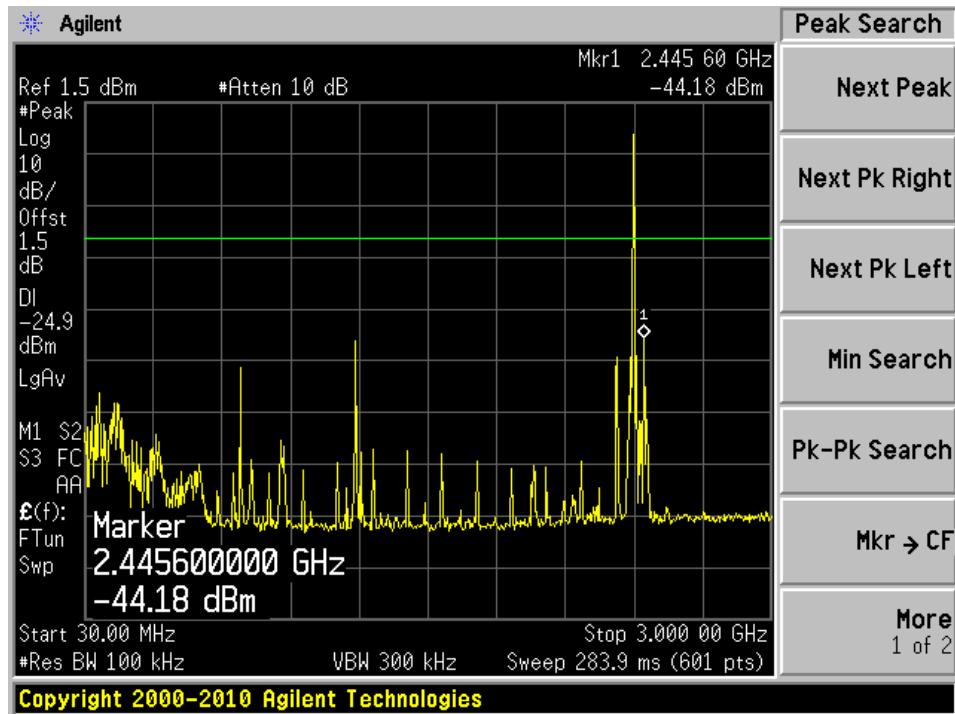
## 2) 1–25 GHz, Measured at 3 meters

Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel 2402 MHz, measured at 3 meters											
2402	48.91	268	300	V	28.35	2.865	0.00	80.12	-	-	Peak
2402	52.14	0	267	H	28.20	2.865	0.00	83.20	-	-	Peak
2402	46.73	269	298	V	28.35	2.865	0.00	77.94	-	-	Ave
2402	50.03	0	265	H	28.20	2.865	0.00	81.09	-	-	Ave
2390	25.72	268	300	V	28.35	2.865	0.00	56.93	74.00	-17.07	Peak
2390	26.56	0	267	H	28.20	2.865	0.00	57.62	74.00	-16.38	Peak
2390	14.84	269	298	V	28.35	2.865	0.00	46.05	54.00	-7.95	Ave
2390	14.92	0	265	H	28.20	2.865	0.00	45.98	54.00	-8.02	Ave
4804	48.99	249	245	V	32.89	4.297	35.86	50.32	74.00	-23.68	Peak
4804	47.04	40	223	H	32.74	4.297	35.86	48.22	74.00	-25.78	Peak
4804	33.88	249	245	V	32.89	4.297	35.86	35.21	54.00	-18.79	Ave
4804	33.33	40	223	H	32.74	4.297	35.86	34.51	54.00	-19.49	Ave
7206	53.77	171	277	V	36.25	5.675	36.01	59.69	60.12	<b>-0.44</b>	Peak
7206	54.9	25	266	H	36.14	5.675	36.01	60.70	63.20	-2.50	Peak
7206	34.71	171	277	V	36.25	5.675	36.01	40.63	57.94	-17.32	Ave
7206	35.09	25	266	H	36.14	5.675	36.01	40.89	61.09	-20.20	Ave
9608	44.96	21	208	V	38.00	8.704	36.04	55.62	60.12	-4.50	Peak
9608	44.51	186	196	H	37.92	8.704	36.04	55.09	63.20	-8.12	Peak
9608	31.64	21	208	V	38.00	8.704	36.04	42.30	57.94	-15.64	Ave
9608	31.55	186	196	H	37.92	8.704	36.04	42.13	61.09	-18.97	Ave
Middle Channel 2440 MHz, measured at 3 meters											
2440	48.21	267	290	V	28.35	2.865	0.00	79.42	-	-	Peak
2440	50.83	0	289	H	28.20	2.865	0.00	81.89	-	-	Peak
2440	46.18	267	290	V	28.35	2.865	0.00	77.39	-	-	Ave
2440	48.79	0	289	H	28.20	2.865	0.00	79.85	-	-	Ave
4880	49.18	229	148	V	33.30	4.404	35.90	50.98	74.00	-23.02	Peak
4880	47.72	123	126	H	32.93	4.404	35.90	49.16	74.00	-24.84	Peak
4880	34.09	229	148	V	33.30	4.404	35.90	35.89	54.00	-18.11	Ave
4880	33.42	123	126	H	32.93	4.404	35.90	34.86	54.00	-19.14	Ave
7320	48.11	209	152	V	36.69	5.788	35.96	54.63	74.00	-19.37	Peak
7320	48.24	19	259	H	36.58	5.788	35.96	54.65	74.00	-19.35	Peak
7320	33.14	209	152	V	36.69	5.788	35.96	39.66	54.00	-14.34	Ave
7320	33.07	19	259	H	36.58	5.788	35.96	39.48	54.00	-14.52	Ave
9760	43.98	26	196	V	38.13	8.157	36.03	54.23	59.42	-5.19	Peak
9760	44.23	254	152	H	37.90	8.157	36.03	54.25	61.89	-7.64	Peak
9760	31.28	26	196	V	38.13	8.157	36.03	41.53	57.39	-15.86	Ave
9760	31.42	254	152	H	37.90	8.157	36.03	41.44	59.85	-18.41	Ave

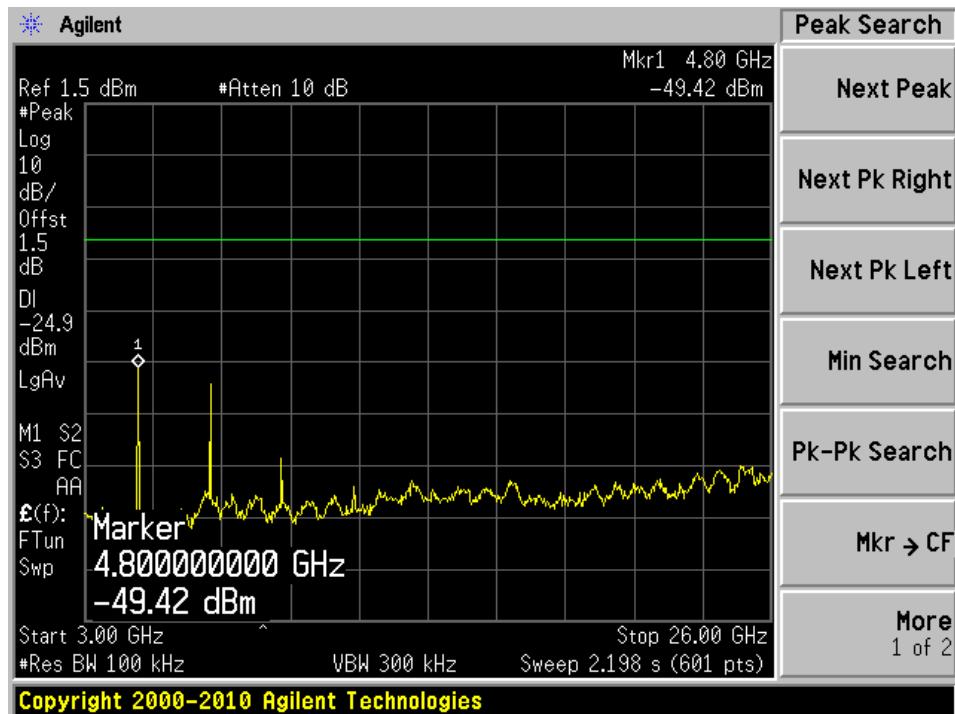
Frequency (MHz)	S.A. Reading (dB $\mu$ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB $\mu$ V/m)	FCC/IC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	
High Channel 2480 MHz, measured at 3 meters											
2480	48.45	270	300	V	28.61	2.950	0.00	80.01	-	-	Peak
2480	51.45	180	282	H	28.52	2.950	0.00	82.92	-	-	Peak
2480	46.61	279	300	V	28.61	2.950	0.00	78.17	-	-	Ave
2480	49.97	182	100	H	28.52	2.950	0.00	81.44	-	-	Ave
2483.5	26.44	270	300	V	28.61	2.950	0.00	58.00	74.00	-16.00	Peak
2483.5	27.46	180	282	H	28.52	2.950	0.00	58.93	74.00	-15.07	Peak
2483.5	15.32	279	300	V	28.61	2.950	0.00	46.88	54.00	-7.12	Ave
2483.5	15.33	182	100	H	28.52	2.950	0.00	46.80	54.00	-7.20	Ave
4960	49.38	229	275	V	33.32	4.485	35.91	51.27	74.00	-22.73	Peak
4960	48.29	244	262	H	33.24	4.485	35.91	50.11	74.00	-23.89	Peak
4960	33.86	229	275	V	33.32	4.485	35.91	35.75	54.00	-18.25	Ave
4960	33.64	244	262	H	33.24	4.485	35.91	35.46	54.00	-18.54	Ave
7440	49.12	229	144	V	36.88	5.869	35.96	55.91	74.00	-18.09	Peak
7440	46.95	215	257	H	36.76	5.869	35.96	53.61	74.00	-20.39	Peak
7440	34	229	144	V	36.88	5.869	35.96	40.79	54.00	-13.21	Ave
7440	30.6	215	257	H	36.76	5.869	35.96	37.26	54.00	-16.74	Ave
9920	43.37	0	100	V	38.36	7.444	35.98	53.20	60.01	-6.80	Peak
9920	43.67	0	100	H	38.37	7.444	35.98	53.51	62.92	-9.40	Peak
9920	29.11	0	100	V	38.36	7.444	35.98	38.94	58.17	-19.22	Ave
9920	29.21	0	100	H	38.37	7.444	35.98	39.05	61.44	-22.38	Ave

## 7.9 Conducted Emissions at Antenna Port Test Results

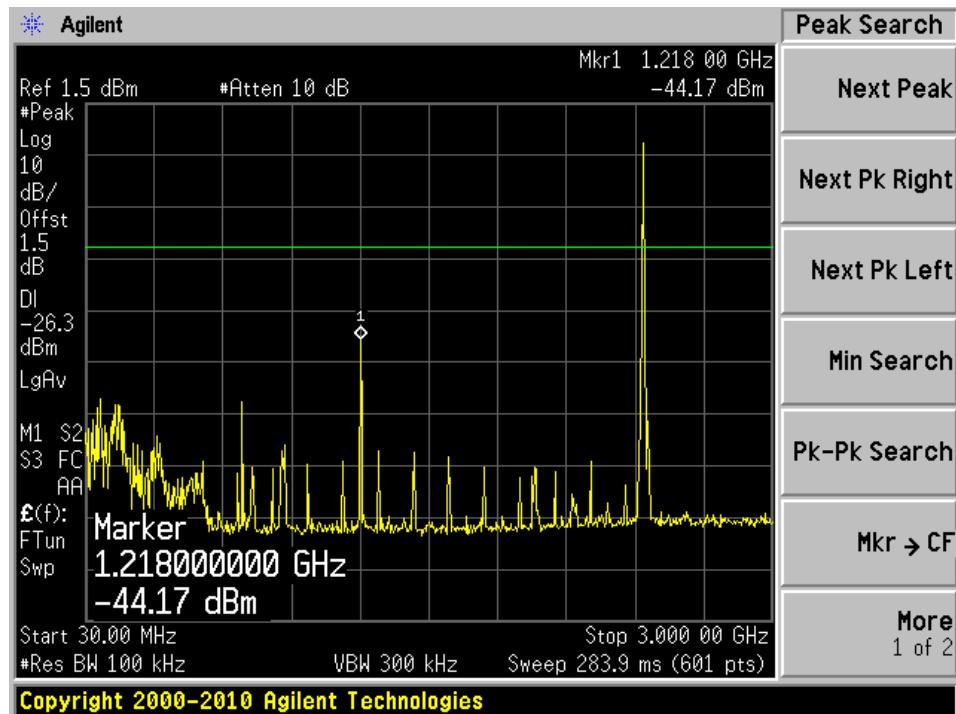
30 MHz – 3 GHz, Low Channel, 2402 MHz



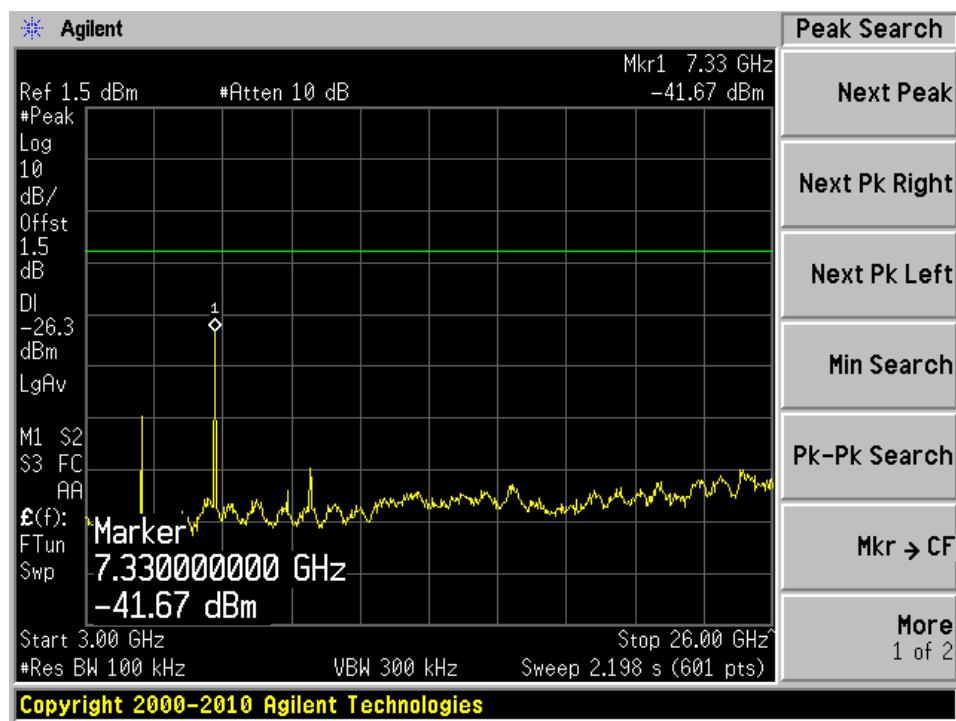
3 GHz – 25 GHz, Low Channel, 2402 MHz



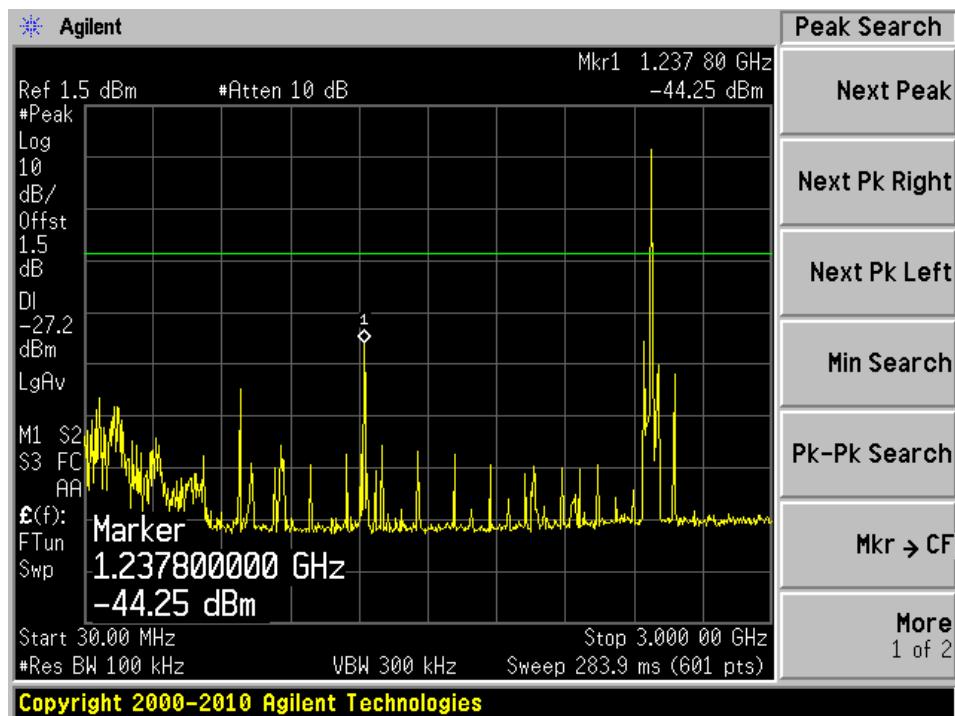
30 MHz – 3 GHz, Middle Channel, 2440 MHz



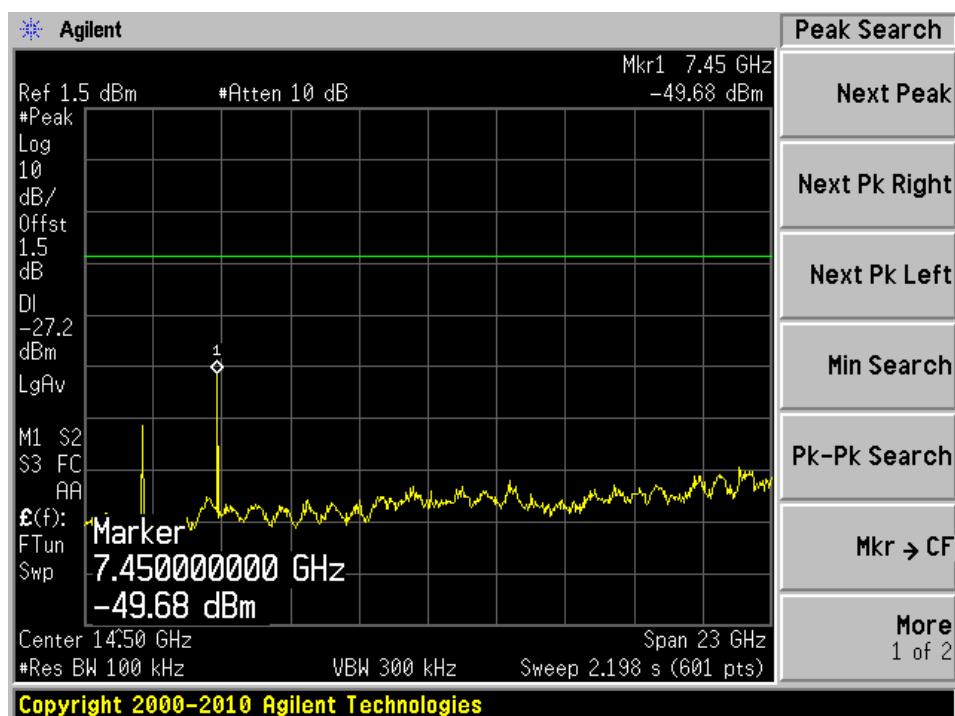
3 GHz – 25 GHz, Middle Channel, 2440 MHz



30 MHz – 3 GHz, High Channel, 2480 MHz



3 GHz – 25 GHz, High Channel, 2480 MHz



## 8 FCC §15.247(a)(2) & IC RSS-247 §5.2, RSS-Gen §6.6 - 6 dB & 99% Emission Bandwidth

### 8.1 Applicable Standards

According to FCC §15.247(a)(2) and IC RSS-247 §5.2, 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

### 8.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v03r03: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth

### 8.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	US44300386	2014-10-24	1 year
Mini Circuit	Precision Fixed Attenuator, 10 dB	BW-S10W5	-	Each Time <sup>1</sup>	N/A
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

*Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.*

### 8.4 Test Environmental Conditions

<b>Temperature:</b>	22 °C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

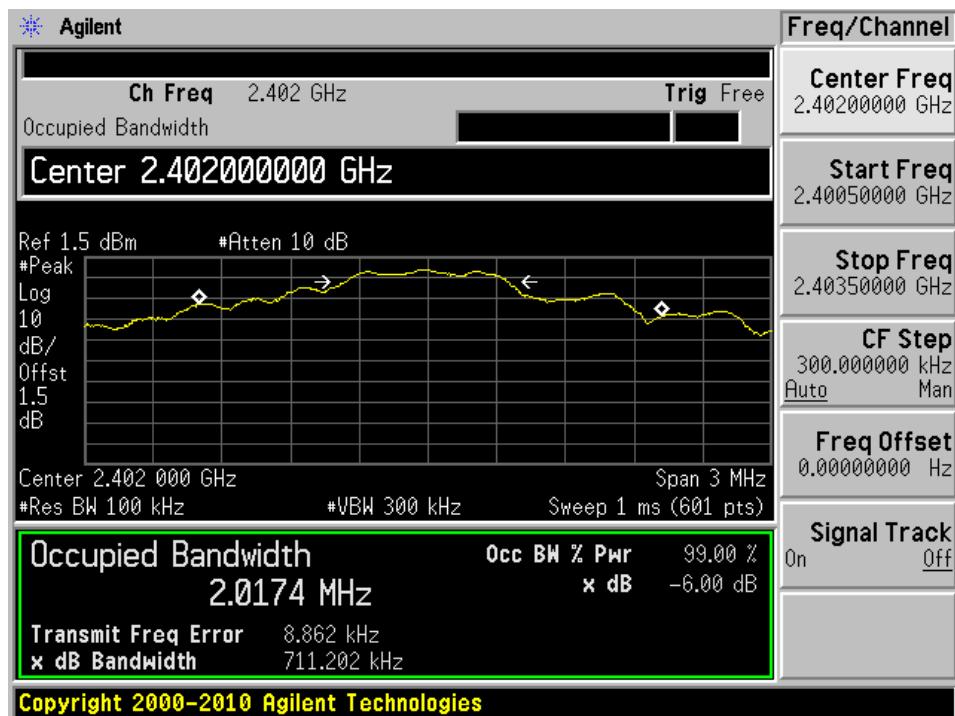
*The testing was performed by Jin Yang on 2015-10-09 in RF site.*

## 8.5 Test Results

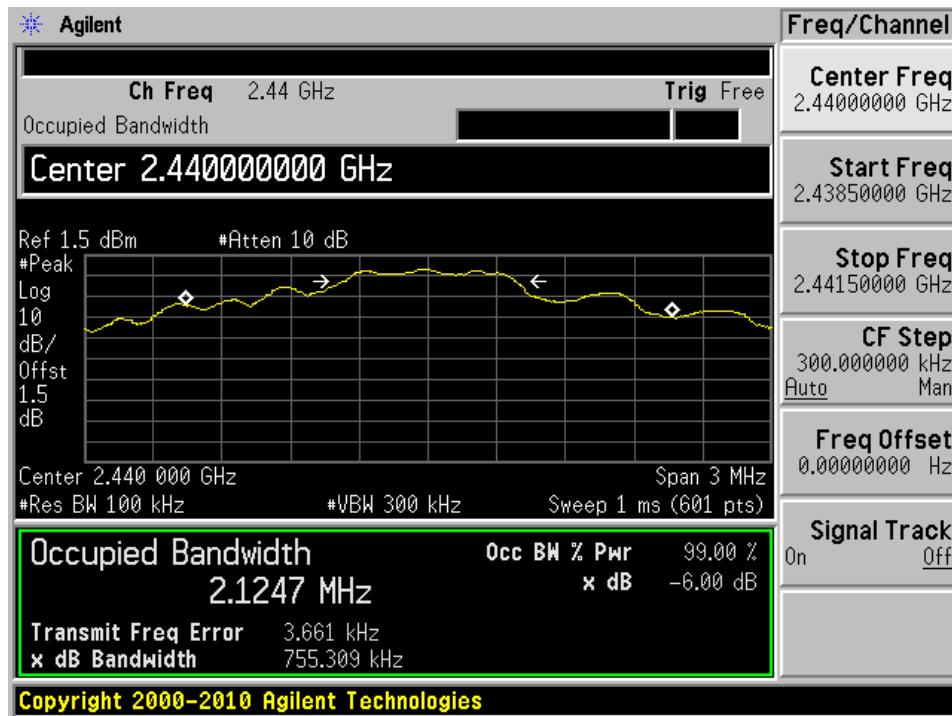
Channel	Frequency (MHz)	99% Occupied Bandwidth (MHz)	6 dB Emission Bandwidth (kHz)	6 dB Emission Bandwidth Limit (kHz)	Result
<b>BLE</b>					
Low	2402	2.1074	711.202	≥500	Pass
Middle	2440	2.1247	755.309	≥500	Pass
High	2480	1.9087	670.959	≥500	Pass

Please refer to the following plots for detailed test results

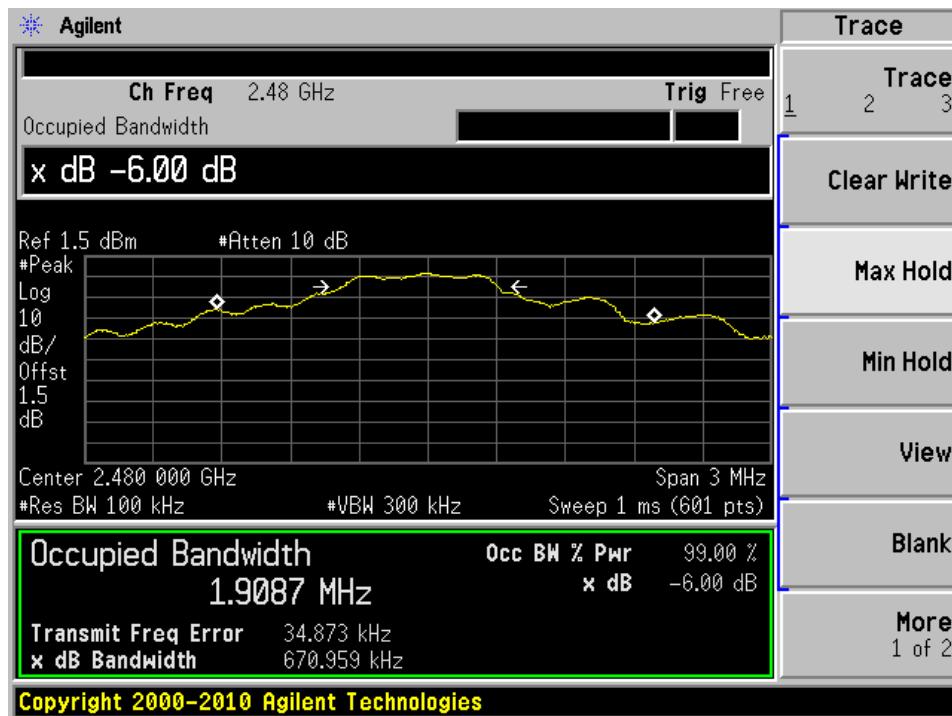
Low Channel 2402 MHz



## Middle Channel 2440 MHz



## High Channel 2480 MHz



## 9 FCC §15.247(b) & IC RSS-247 §5.4 - Output Power Measurement

### 9.1 Applicable Standards

According to FCC §15.247(b) and IC RSS-247 §5.4 (4) for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

### 9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v03r03: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 9: Fundamental emission output power

### 9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	US44300386	2014-10-24	1 year
Mini Circuit	Precision Fixed Attenuator, 10 dB	BW-S10W5	-	Each Time <sup>1</sup>	N/A
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

### 9.4 Test Environmental Conditions

Temperature:	22 °C
Relative Humidity:	42 %
ATM Pressure:	102.7 kPa

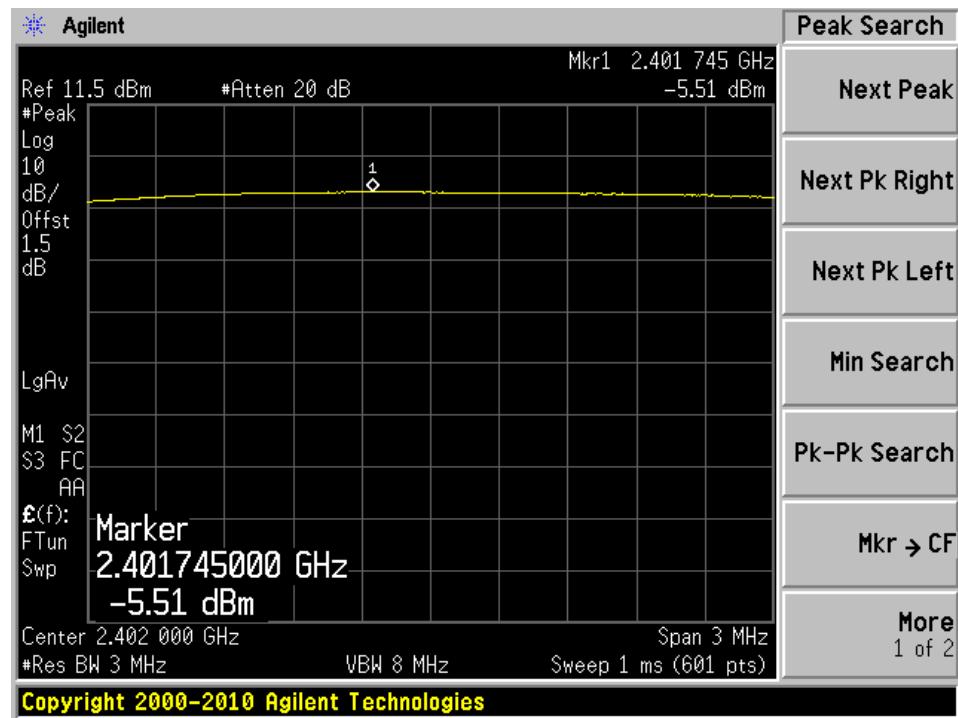
The testing was performed by Jin Yang on 2015-10-09 in RF site.

### 9.5 Test Results

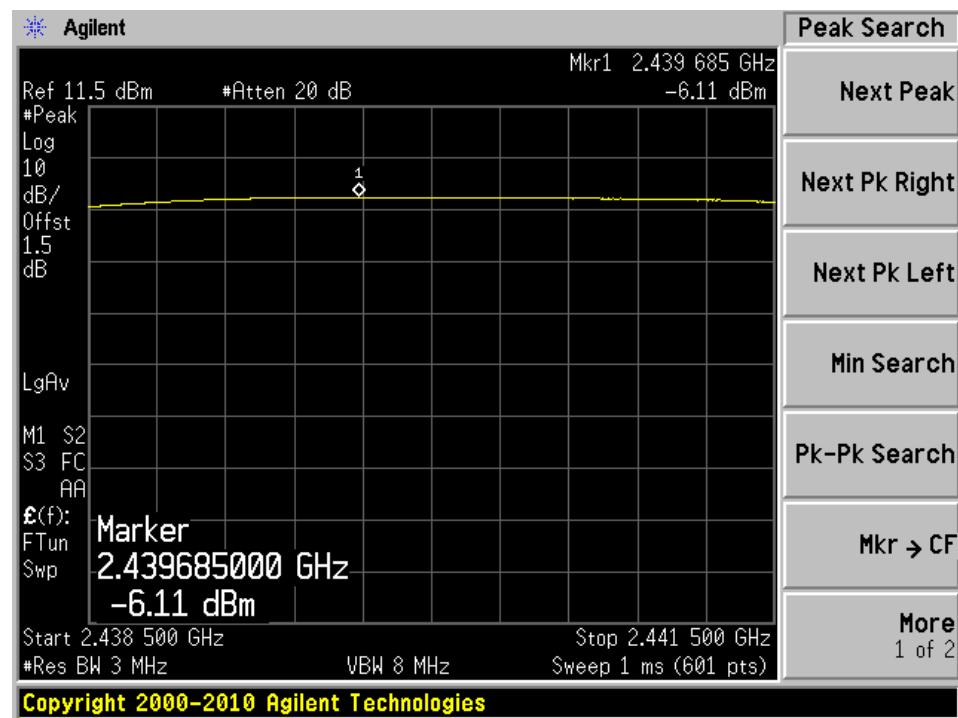
Frequency (MHz)	Conducted Output Power (dBm)	Limit (dBm)	Result
2402	-5.51	30	Pass
2440	-6.11	30	Pass
2480	-7.88	30	Pass

Please refer to the following plots for detailed test results

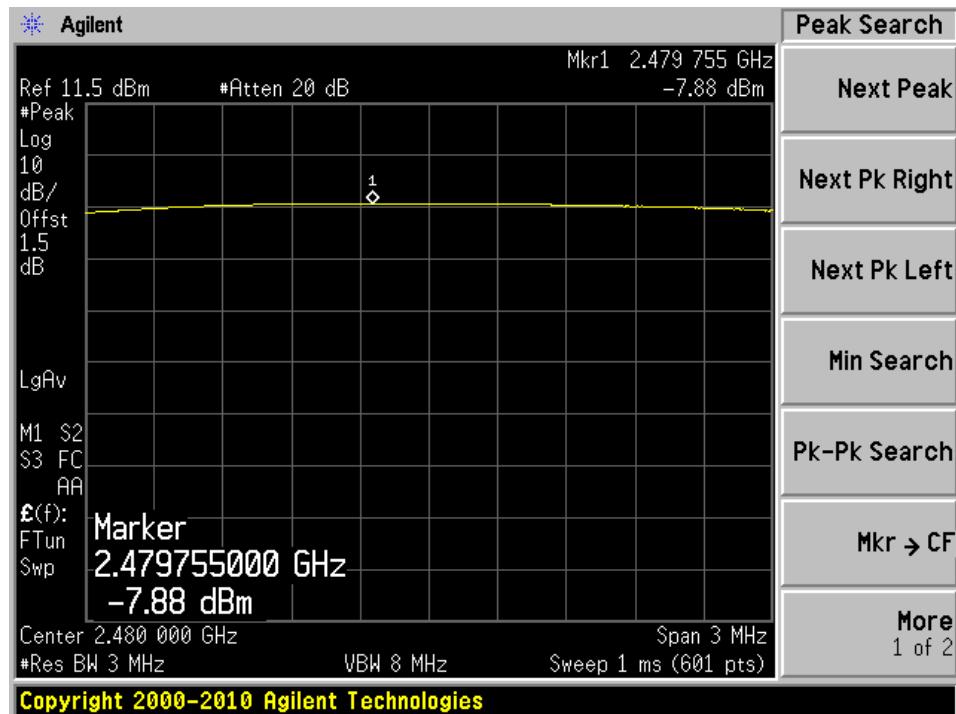
### Low Channel 2402 MHz



### Middle Channel 2440 MHz



## High Channel 2480 MHz



## 10 FCC §15.247(d) & IC RSS-247 §5.5 - 100 kHz Bandwidth of Band Edges

### 10.1 Applicable Standards

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum 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. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

According to IC Rss-247 §5.5. 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(4), 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.

### 10.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v03r03: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 13: Band-edge measurements

### 10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	US44300386	2014-10-24	1 year
Mini Circuit	Precision Fixed Attenuator, 10 dB	BW-S10W5	-	Each Time <sup>1</sup>	N/A
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

**Statement of Traceability:** *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

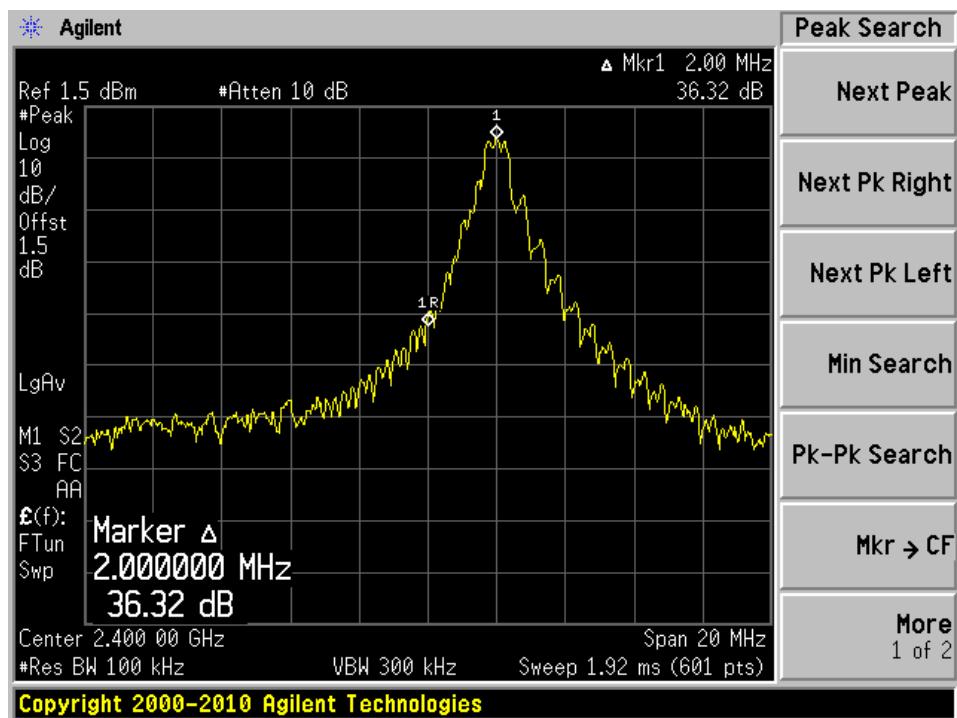
### 10.4 Test Environmental Conditions

<b>Temperature:</b>	22° C
<b>Relative Humidity:</b>	42 %
<b>ATM Pressure:</b>	102.7 KPa

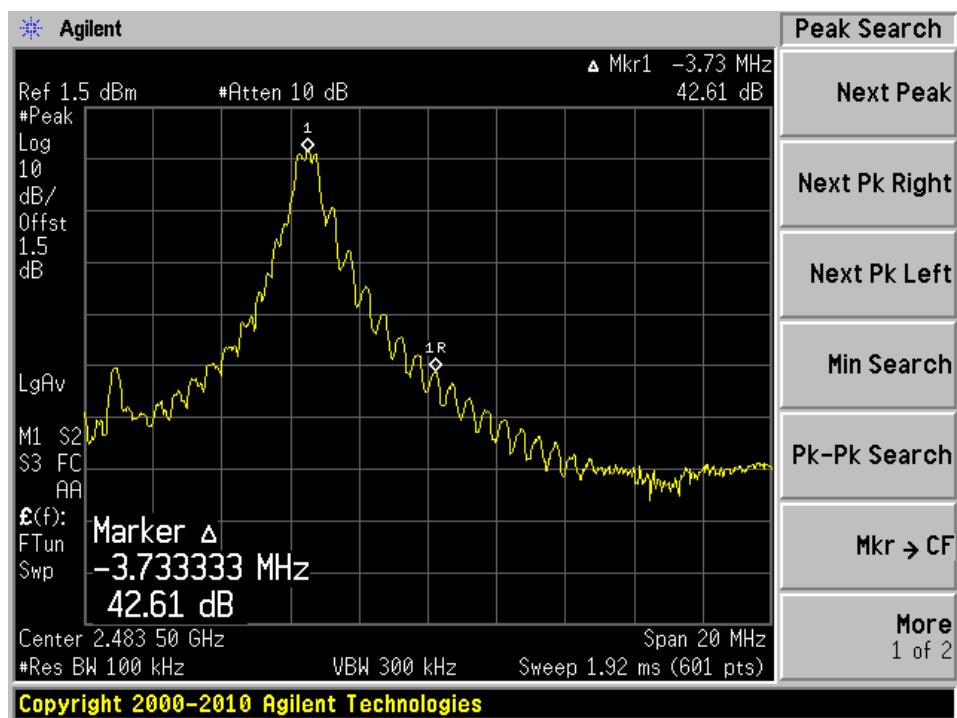
The testing was performed by Jin Yang on 2015-10-09 in RF site.

## 10.5 Test Results

Band Edge at Low Channel 2402 MHz



Band Edge at High Channel 2480 MHz



## 11 FCC §15.247(e) & IC RSS-247 §A8.2 (b) - Power Spectral Density

### 11.1 Applicable Standards

According to FCC §15.247(e) and RSS-247 §5.2 ( b ) , 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.

### 11.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v03r03: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 10: Maximum power spectral density level in the fundamental emission

### 11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Spectrum Analyzer	E4446A	US44300386	2014-10-24	1 year
Mini Circuit	Precision Fixed Attenuator, 10 dB	BW-S10W5	-	Each Time <sup>1</sup>	N/A
-	SMA cable	-	C0002	Each time <sup>1</sup>	N/A

Note<sup>1</sup>: cable and attenuator included in the test set-up will be checked each time before testing.

*Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.*

### 11.4 Test Environmental Conditions

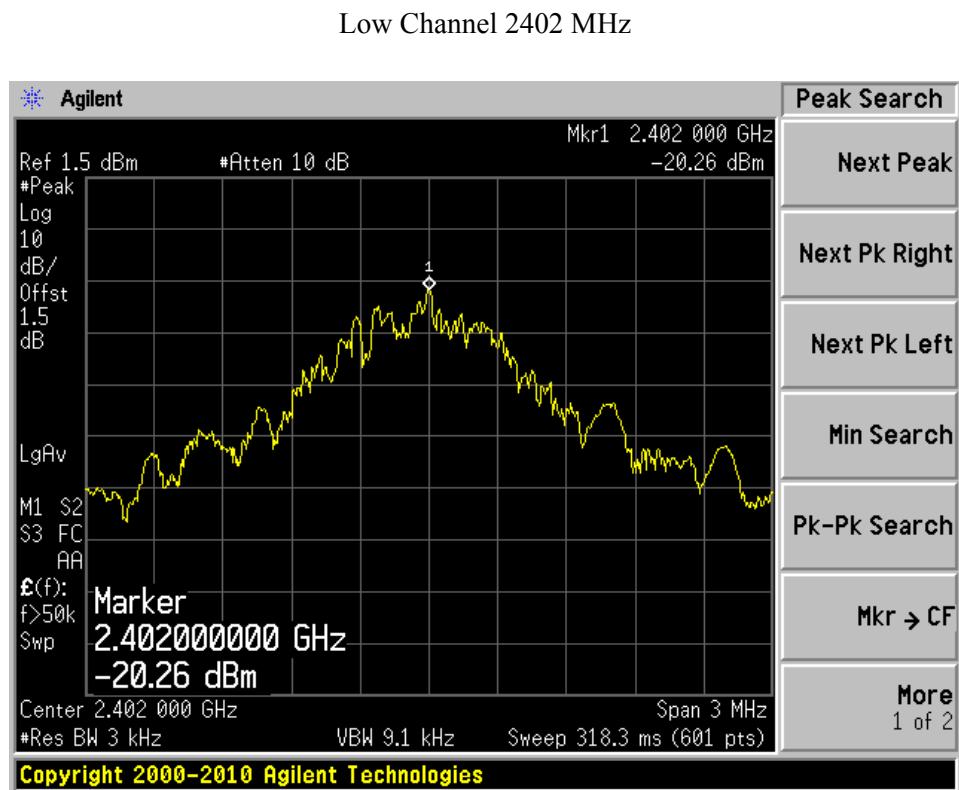
Temperature:	22 °C
Relative Humidity:	42 %
ATM Pressure:	102.7 kPa

*The testing was performed by Jin Yang on 2015-10-09 in RF site.*

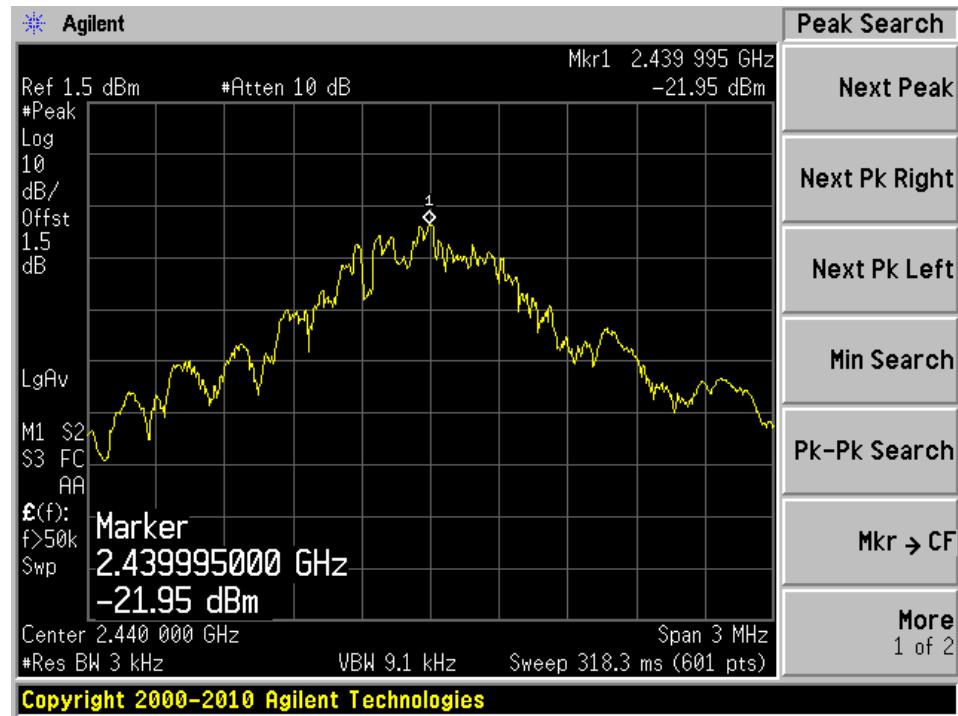
## 11.5 Test Results

Frequency (MHz)	Power Spectral Density (dBm)	Limit (dBm)
2402	-20.26	8
2440	-21.95	8
2480	-22.26	8

Please refer to the following plots for detailed test results



## Middle Channel 2440 MHz



## High Channel 2480 MHz

