



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

914 WEST PATAPSCO AVENUE ! BALTIMORE, MARYLAND 21230-3432 ! PHONE (410) 354-3300 ! FAX (410) 354-3313
33439 WESTERN AVENUE ! UNION CITY, CALIFORNIA 94587 ! PHONE (510) 489-6300 ! FAX (510) 489-6372
3162 BELICK STREET ! SANTA CLARA, CA 95054 ! PHONE (408) 748-3585 ! FAX (510) 489-6372
13301 MCCALLEN PASS ! AUSTIN, TX 78753 ! PHONE (512) 287-2500 ! FAX (512) 287-2513

February 22, 2017

Intelligent Automation, Inc.
15400 Calhoun Place Suite 400
Rockville, MD 20855

Dear Eric van Doorn,

Enclosed is the EMC Wireless test report for compliance testing of the Intelligent Automation, Inc. , ARGUS Modular as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15, Subpart B for a Class B Digital Device, and FCC Part 15 Subpart C 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.

Joel Huna
Documentation Department

Reference: (\Intelligent Automation, Inc. \EMC92310-FCC247 Rev. 2)

Certificates and reports shall not be reproduced except in full, without the written permission of MET Laboratories, Inc.

Electromagnetic Compatibility Criteria Test Report

for the

**Intelligent Automation, Inc.
ARGUS Modular**

Tested under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B
for Class B Digital Devices
&
15.247 Subpart C
for Intentional Radiators

MET Report: EMC92310-FCC247 Rev. 2

February 22, 2017

Prepared For:

**Intelligent Automation, Inc.
15400 Calhoun Place Suite 400
Rockville, MD 20855**

Prepared By:
MET Laboratories, Inc.
914 West Patapsco Avenue,
Baltimore, MD 21230

Electromagnetic Compatibility Criteria Test Report

for the

**Intelligent Automation, Inc.
ARGUS Modular**

Tested under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B
for Class B Digital Devices
&
15.247 Subpart C
for Intentional Radiators



Donald Salguero, Project Engineer
Electromagnetic Compatibility Lab



Joel Huna
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 and 15.247 Issue 4 February 2004, under normal use and maintenance.



Asad Bajwa,
Director, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	December 16, 2016	Initial Issue.
1	February 20, 2017	Engineer corrections.
2	February 22, 2017	Editorial corrections.

Table of Contents

I.	Executive Summary	1
	A. Purpose of Test	2
	B. Executive Summary	2
II.	Equipment Configuration	3
	A. Overview.....	4
	B. References.....	5
	C. Test Site	5
	D. Description of Test Sample	6
	E. Equipment Configuration.....	7
	F. Support Equipment	7
	G. Ports and Cabling Information.....	8
	H. Mode of Operation.....	8
	I. Method of Monitoring EUT Operation.....	8
	J. Modifications	8
	a) Modifications to EUT	8
	b) Modifications to Test Standard.....	8
	K. Disposition of EUT	8
III.	Electromagnetic Compatibility Criteria for Unintentional Radiators	9
	§ 15.107(a) Conducted Emissions Limits.....	10
	§ 15.109(a) Radiated Emissions Limits	11
IV.	Electromagnetic Compatibility Criteria for Intentional Radiators.....	14
	§ 15.203 Antenna Requirement	15
	§ 15.207(a) Conducted Emissions Limits.....	16
	§ 15.247(a)(1) 20 dB Occupied Bandwidth.....	17
	§ 15.247(a)(1) Average Time of Occupancy (Dwell Time)	19
	§ 15.247(a)(1) Number of RF Channels	21
	§ 15.247(a)(1) RF Channel Separation	22
	§ 15.247(b) Peak Power Output	24
	§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge.....	27
	§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge.....	42
	§ 15.247(g)(h) Declaration Statements for FHSS	48
V.	Test Equipment	50
VI.	Certification & User's Manual Information	52
	A. Certification Information	53
	B. Label and User's Manual Information	57

List of Tables

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing	2
Table 2. EUT Summary Table.....	4
Table 3. References	5
Table 4. Equipment Configuration	7
Table 5. Support Equipment.....	7
Table 6. Ports and Cabling Information	8
Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)	10
Table 8. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b)	11
Table 9. Radiated Emissions Limits, Test Results, 30 MHz – 1 GHz, FCC Limits	12
Table 10. Antenna List	15
Table 11. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)	16
Table 12. Average Time of Occupancy.....	19
Table 13. Peak Power Output, Test Results	25
Table 14. Restricted Bands of Operation.....	27
Table 15. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)	28
Table 17. Test Equipment List	51

List of Plots

Plot 1. Radiated Emissions, 30 MHz - 1 GHz, FCC Limits	12
Plot 2. Radiated Emissions, 1 GHz – 12.5 GHz, FCC Limit.....	13
Plot 3. 20 dB Occupied Bandwidth, Low Channel.....	18
Plot 4. 20 dB Occupied Bandwidth, Mid Channel	18
Plot 5. 20 dB Occupied Bandwidth, High Channel	18
Plot 6. Dwell Time	20
Plot 7. Number of Burst per Period.....	20
Plot 8. Number of Channels	21
Plot 9. Channel Separation, Low channel.....	22
Plot 10. Channel Separation, Mid channel	23
Plot 11. Channel Separation, High channel	23
Plot 12. Peak Power Output, Low Channel	26
Plot 13. Peak Power Output, Mid Channel.....	26
Plot 14. Peak Power Output, High Channel	26
Plot 15. Peak Radiated Spurious Emissions up to 10 th Harmonic, 1-7GHz, Ch. High.....	29
Plot 16. Peak Radiated Spurious Emissions up to 10 th Harmonic, 7-18GHz, Ch. High.....	29
Plot 17. Peak Radiated Spurious Emissions up to 10 th Harmonic, 1-7GHz, Ch. Low.....	29
Plot 18. Peak Radiated Spurious Emissions up to 10 th Harmonic, 7-18GHz, Ch. Low.....	30
Plot 19. Peak Radiated Spurious Emissions up to 10 th Harmonic, 1-7GHz, Ch. Mid	30
Plot 20. Peak Radiated Spurious Emissions up to 10 th Harmonic, 7-18GHz, Ch. Mid	30
Plot 21. Peak Radiated Spurious Emissions up to 10 th Harmonic, 1-7GHz, Hopping.....	31
Plot 22. Peak Radiated Spurious Emissions up to 10 th Harmonic, 7-18GHz, Hopping.....	31
Plot 23. Radiated Spurious Emissions up to 10 th Harmonic, 30Mhz-1GHz, Ch. High	32
Plot 24. Radiated Spurious Emissions up to 10 th Harmonic, 30Mhz-1GHz, Ch. Low	32
Plot 25. Radiated Spurious Emissions up to 10 th Harmonic, 30Mhz-1GHz, Ch. Mid	33
Plot 26. Radiated Spurious Emissions up to 10 th Harmonic, 30Mhz-1GHz, Hopping	33
Plot 27. Average Radiated Spurious Emissions up to 10 th Harmonic, 1-18GHz, Ch. High	34
Plot 28. Average Radiated Spurious Emissions up to 10 th Harmonic, 1-18GHz, Ch. Low	34
Plot 29. Average Radiated Spurious Emissions up to 10 th Harmonic, 1-18GHz, Ch. Mid.....	35
Plot 30. Average Radiated Spurious Emissions up to 10 th Harmonic, 1-18GHz, Hopping	35

Plot 31. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Peak, Ch. High	36
Plot 32. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Peak, Ch. Low	36
Plot 33. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Average, Ch. High	37
Plot 34. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Average, Ch. Low	37
Plot 35. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Peak, Ch. High, Hopping	37
Plot 36. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Peak, Ch. Low, Hopping	38
Plot 37. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Average, Ch. High, Hopping	38
Plot 38. Radiated Spurious Emissions up to 10 th Harmonic, Band Edge, Average, Ch. Low, Hopping	38
Plot 55. Conducted Spurious Emissions, Low Channel, 100k, 30 MHz – 1 GHz	43
Plot 56. Conducted Spurious Emissions, Low Channel, 100k, 1 GHz – 18 GHz	43
Plot 57. Conducted Spurious Emissions, Mid Channel, 100k, 30 MHz – 1 GHz	43
Plot 58. Conducted Spurious Emissions, Mid Channel, 100k, 1 GHz – 18 GHz	44
Plot 59. Conducted Spurious Emissions, High Channel, 100k, 30 MHz – 1 GHz	44
Plot 60. Conducted Spurious Emissions, High Channel, 100k, 1 GHz – 18 GHz	44
Plot 59. Conducted Spurious Emissions, Hopping, 100k, 30 MHz – 1 GHz	45
Plot 60. Conducted Spurious Emissions, Hopping, 100k, 1 GHz – 18 GHz	45
Plot 61. Conducted Band Edge, High Ch, 100k	46
Plot 62. Conducted Band Edge, Low Ch, 100k	46
Plot 61. Conducted Band Edge, Hopping, High Ch. 100k	47
Plot 61. Conducted Band Edge, Hopping, Low Ch. 100k	47

List of Figures

Figure 1. Block Diagram of Test Configuration.....	6
Figure 2. Block Diagram, Occupied Bandwidth Test Setup.....	17
Figure 3. Peak Power Output Test Setup.....	24
Figure 4. Block Diagram, Conducted Spurious Emissions Test Setup.....	42

List of Photographs

Photograph 1. Intelligent Automation, Inc. ARGUS Modular	6
Photograph 2. Radiated Emission Limits, Below 1GHz, Test Setup.....	13
Photograph 3. Radiated Spurious Emissions, Below 1GHz, Test Setup	40
Photograph 4. Radiated Spurious Emissions, Above 1GHz, Test Setup	41

List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dB_μA	Decibels above one microamp
dB_μV	Decibels above one microvolt
dB_μA/m	Decibels above one microamp per meter
dB_μV/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
μ	microfarad
μs	microseconds
NEBS	Network Equipment-Building System
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 Intelligent Automation, Inc. ARGUS Modular, with the requirements of Part 15, §15.247. 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 ARGUS Modular. Intelligent Automation, Inc. should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the ARGUS Modular, 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, §15.247, in accordance with Intelligent Automation, Inc. , purchase order number 2248161004-001. All tests were conducted using measurement procedure ANSI C63.4-2003.

FCC Reference 47 CFR Part 15.247:2005	Description	Compliance
47 CFR Part 15.107 (a)	Conducted Emission Limits for a Class B Digital Device	N/A
47 CFR Part 15.109 (a)	Radiated Emission Limits for a Class B Digital Device	Compliant
Title 47 of the CFR, Part 15 §15.203	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	Conducted Emission Limits	N/A
15.209	Radiated Emissions up to 10 th Harmonic	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	20 dB Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	Average Time of Occupancy (Dwell Time)	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	Number of RF Channels	Compliant
Title 47 of the CFR, Part 15 §15.247(a)(1)	RF Channel Separation	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	Peak Power Output	Compliant
Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205	Radiated Spurious Emissions	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	Spurious Conducted Emissions	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	Maximum Permissible Exposure (MPE)	Compliant

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by Intelligent Automation, Inc. to perform testing on the ARGUS Modular, under Intelligent Automation, Inc. 's purchase order number 2248161004-001.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Intelligent Automation, Inc. , ARGUS Modular.

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

Model(s) Tested:	ARGUS Modular
Model(s) Covered:	ARGUS Modular
EUT Specifications:	Primary Power: 2.1-3.6VDC
	FCC ID: 2AI6Y-GRIDLOCKMOD
	Type of Modulations: 2.4GHz: DSSS OQPSK
	Equipment Code: FHSS
	Peak RF Output Power: 8.16 dBm
	EUT Frequency Ranges: 2.405-2.475GHz
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:	Donald Salguero
Report Date(s):	February 22, 2017

Table 2. EUT Summary Table

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
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

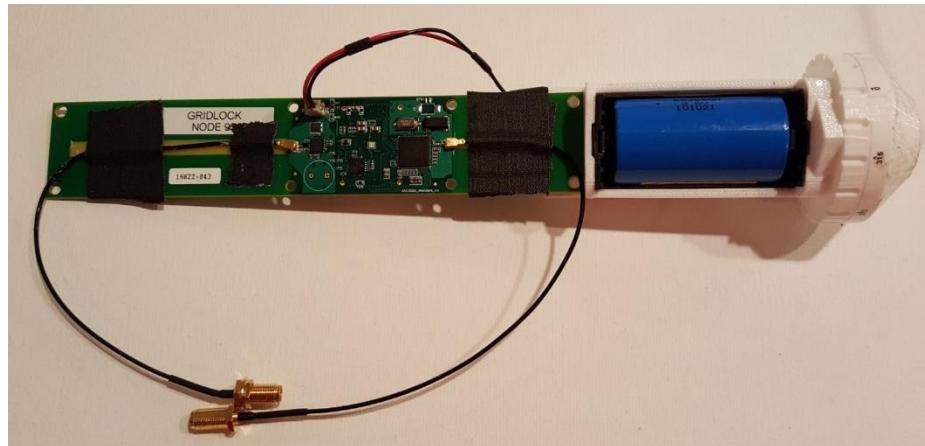
C. Test Site

All testing was performed at MET Laboratories, Inc., 914 West Patapsco Avenue, Baltimore, MD 21230. 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 **3** meter 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 Intelligent Automation, Inc. ARGUS Modular, Equipment Under Test (EUT), is a system of unattended ground sensors used for the purpose of perimeter intrusion detection, typically in outdoor wooded or open settings surrounding a building or other high valued asset needed protection. Each individual ARGUS sensor is comprised of two radio transceivers – one 2.4GHz transceiver for the purpose of networking and communications, and one 900MHz transceiver for the purpose of sending/receiving the transmissions that are actually used to detect the intruders.



Photograph 1. Intelligent Automation, Inc. ARGUS Modular

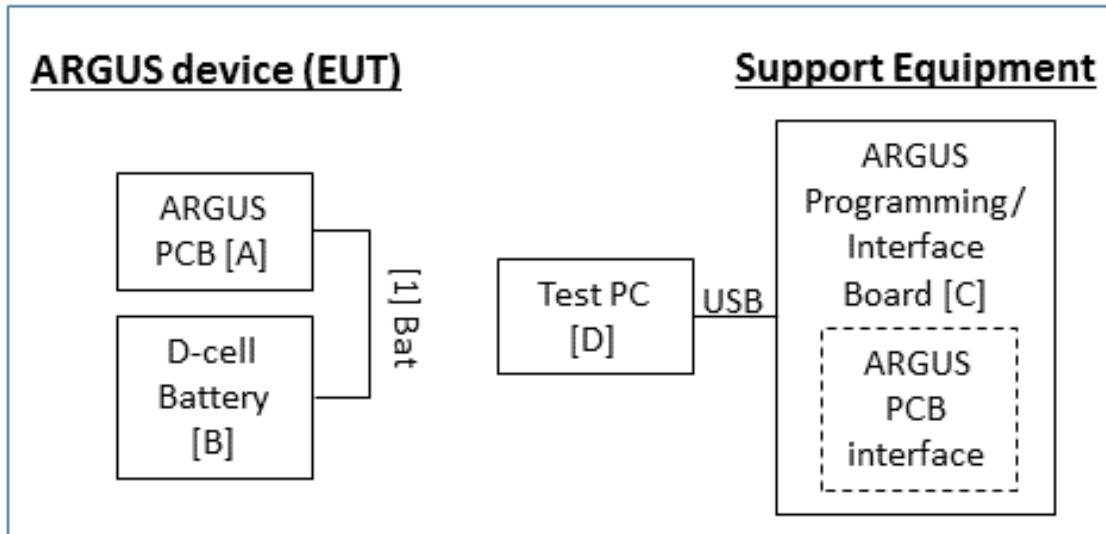


Figure 1. Block Diagram of Test Configuration

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	Slot #	Name / Description	Model Number	Part Number	Serial Number	Rev. #
A		ARGUS PCB	IAI15001_ARGUSHS_X4			X4
B		D-CELL BATTERY	ER34615			

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	*Customer Supplied Calibration Data
C	ARGUS PROGRAMMING/INTERFACE BOARD	INTELLIGENT AUTOMATION, INC.	IAI15001_DEV_X2	NOT APPLICABLE
D	TEST/CONFIGURATION PC	PANASONIC	TOUGHBOOK CF-31	NOT APPLICABLE

The 'Customer Supplied Calibration Data' column will be marked as either not applicable, not available, or will contain the calibration date supplied by the customer.

Table 5. Support Equipment

G. Ports and Cabling Information

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	BAT	2 conductor, 26 awg	1	0.2		No	

Table 6. Ports and Cabling Information

H. Mode of Operation

ARGUS is a system of unattended ground sensors used for the purpose of perimeter intrusion detection, typically in outdoor wooded or open settings surrounding a building or other high valued asset needed protection. Each individual ARGUS sensor is comprised of two radio transceivers – one 2.4GHz transceiver for the purpose of networking and communications, and one 900MHz transceiver for the purpose of sending/receiving the transmissions that are actually used to detect the intruders.

I. Method of Monitoring EUT Operation

1. The EUT will blink its onboard LED green three times indicating that it has started up. After startup, no LED indication is present.
2. If directly connected to a PC USB port (via the separate configuration interface board), the EUT will print out statements indicating the test mode being used upon startup. This would be done only to confirm a configuration, but would not be used during actual testing.
3. The 2.4GHz and/or 900MHz transmissions can be observed on a spectrum analyzer.

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 Intelligent Automation, Inc. upon completion of testing.

III. Electromagnetic Compatibility Criteria for Unintentional Radiators

Electromagnetic Compatibility Criteria

§ 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.

15.207(a), Except as shown in paragraphs (b) and (c) of this section*, charging, AC adapters or battery eliminators 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 Table 7, as measured using a 50 μ 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 range (MHz)	Class A Conducted Limits (dB μ V)		*Class B Conducted Limits (dB μ V)	
	Quasi-Peak	Average	Quasi-Peak	Average
* 0.15- 0.45	79	66	66 - 56	56 - 46
0.45 - 0.5	79	66	56	46
0.5 - 30	73	60	60	50

Note 1 — The lower limit shall apply at the transition frequencies.
 Note 2 — The limit decreases linearly with the logarithm if the frequency in the range 0.15 MHz to 0.5 MHz.
 * -- Limits per Subsection 15.207(a).

Table 7. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)

Test Procedures:

The EUT was placed on a non-metallic table, 80 cm above the ground plane inside a semi-anechoic chamber. The method of testing, test conditions, and test procedures of ANSI C63.4 were used. The EUT was powered through a 50 Ω /50 μ H LISN. An EMI receiver, connected to the measurement port of the LISN, scanned the frequency range from 150 kHz to 30 MHz in order to find the peak conducted emissions. All peak emissions within 6 dB of the limit were re-measured using a quasi-peak and/or average detector as appropriate.

Test Results:

The EUT was not applicable with the Class B requirement(s) of this section. 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 non-metallic table, 80 cm above the ground plane 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. For final emissions measurements at each frequency of interest, 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 and the data was recorded. Unless otherwise specified, measurements were made using a quasi-peak detector with a 120 kHz bandwidth.

Test Results:

The EUT was compliant with the Class A requirement(s) of this section. Measured emissions were within applicable limits.

Test Engineer(s): Donald Salguero

Test Date(s): October 31, 2016

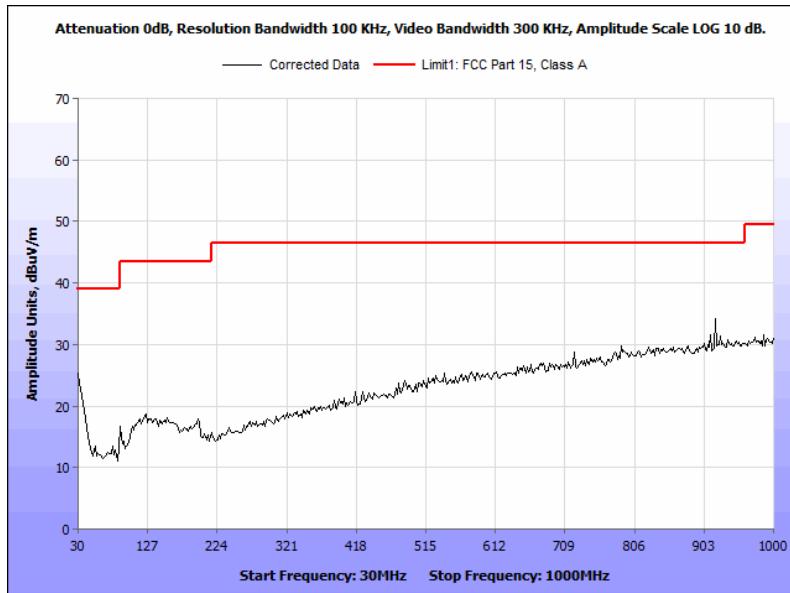
Radiated Emissions Limits Test Results, Class A

Frequency (MHz)	EUT Azimuth (Degrees)	Antenna Polarity (H/V)	Antenna HEIGHT (m)	Uncorrected EMI Meter Reading (dBuV)	Antenna Correction Factor (dB/m) (+)	Cable Loss/Pre-amp (dB) (+)	Distance Correction Factor (dB) (-)	Corrected Amplitude (dBuV/m)	Limit (dBuV/m)	Margin (dB)
918.356	159	H	1.4556	6.58	23.20	2.85	-10.54	32.63	46	-23.91
918.356	186	V	2.2265	6.65	23.20	2.85	-10.54	32.70	46	-23.84
30	217	H	1.7613	5.95	22.60	0.62	-10.54	29.17	40	-21.37
30	267	V	2.4008	6.02	22.60	0.62	-10.54	29.24	40	-21.3
90.26	83	H	1.93	6.02	8.15	1.09	-10.54	15.26	43.5	-38.78
90.26	180	V	1.6517	6.09	8.15	1.09	-10.54	15.33	43.5	-38.71
127.2	169	H	2.1173	6.16	14.40	1.24	-10.54	21.80	43.5	-32.24
127.2	29	V	1.7743	6.23	14.40	1.24	-10.54	21.87	43.5	-32.17
199.19	358	H	1.4891	6.98	13.29	1.51	-10.54	21.78	43.5	-32.26
199.19	294	V	2.2521	6.98	13.29	1.51	-10.54	21.78	43.5	-32.26
724	176	H	2.1404	5.95	21.20	2.50	-10.54	29.65	46	-26.89
724	80	V	1.7321	5.95	21.20	2.50	-10.54	29.65	46	-26.89

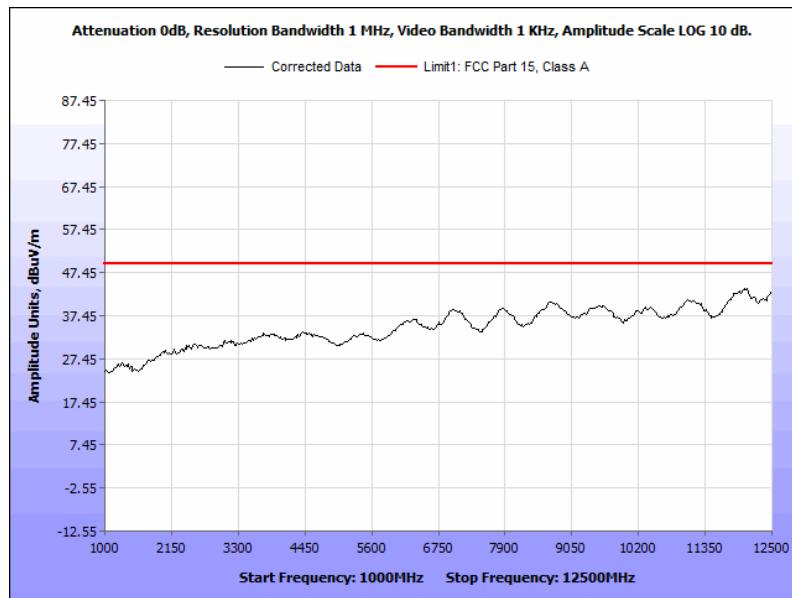
Table 9. Radiated Emissions Limits, Test Results, 30 MHz – 1 GHz, FCC Limits

Note 1: The EUT was tested at 3 m. The data has been corrected for comparison with the 10 m limit using the formula: $20\log(3\text{ m}/10\text{ m})$ as expressed in the 'Distance Correction' column.

Note 2: The following sample calculation was used to correct the amplitude (Corrected Amplitude (dBuV/m) = Uncorrected Data+ACF+Cable Loss-Distance Correction Factor).



Plot 1. Radiated Emissions, 30 MHz - 1 GHz, FCC Limits



Plot 2. Radiated Emissions, 1 GHz – 12.5 GHz, FCC Limit



Photograph 2. Radiated Emission Limits, Below 1GHz, Test Setup

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.

Results: The EUT as tested is compliant the criteria of §15.203. EUT has an integral antenna.

Test Engineer(s): Donald Salguero

Test Date(s): October 25, 2016

Gain	Type	Model	Manufacturer
3dBi	Strip-line, dipole antenna	Built-in	Intelligent Automation

Table 10. Antenna List

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207(a) Conducted Emissions Limits

Test Requirement(s): **§ 15.207 (a):** 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 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω 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 frequency ranges.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB μ V)	
	Quasi-Peak	Average
* 0.15- 0.45	66 - 56	56 - 46
0.45 - 0.5	56	46
0.5 - 30	60	50

Table 11. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Procedure: The EUT was placed on a 0.8 m-high wooden table inside a screen room. The EUT was situated such that the back of the EUT was 0.4 m from one wall of the vertical ground plane, and the remaining sides of the EUT were no closer than 0.8 m from any other conductive surface. The EUT was powered from a 50 Ω /50 μ H Line Impedance Stabilization Network (LISN). The EMC receiver scanned the frequency range from 150 kHz to 30 MHz. Conducted Emissions measurements were made in accordance with *ANSI C63.4-2003 "Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9kHz to 40 GHz"*. The measurements were performed over the frequency range of 0.15 MHz to 30 MHz using a 50 Ω /50 μ H LISN as the input transducer to an EMC/field intensity meter. For the purpose of this testing, the transmitter was turned on. Scans were performed with the transmitter on.

Test Results: The EUT was not applicable with this requirement. EUT is battery powered.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) 20 dB Occupied Bandwidth

Test Requirements: **§ 15.247(a):** Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. For DTS, the minimum 6 dB bandwidth shall be at least 500 kHz. For frequency hopping systems, the EUT shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

Test Procedure: The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately equal to 1% of the total emission bandwidth. The 20 dB bandwidth was measured and recorded.

Test Results The EUT was compliant with § 15.247 (a)(2). No anomalies detected.

Test Engineer(s): Donald Salguero

Test Date(s): October 27, 2016

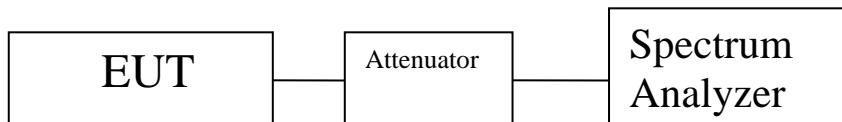
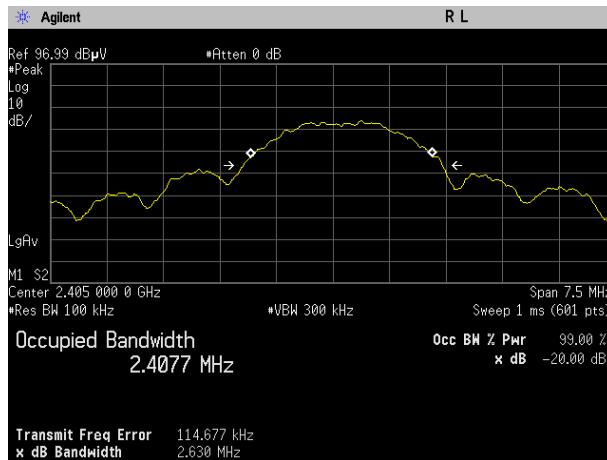
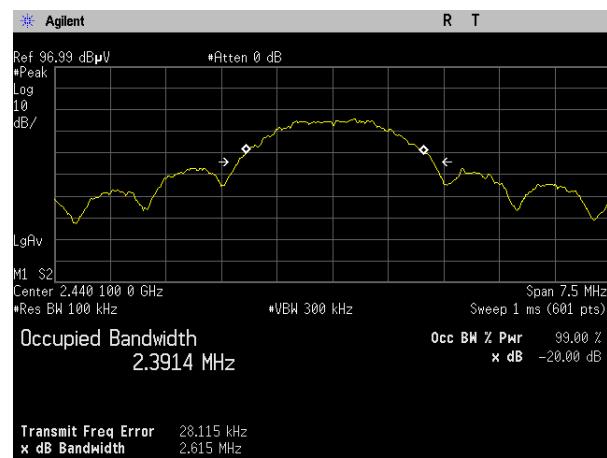


Figure 2. Block Diagram, Occupied Bandwidth Test Setup

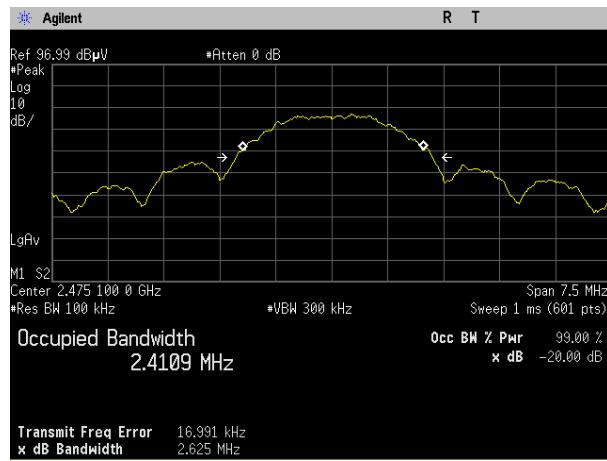
20 dB Occupied Bandwidth Test Results



Plot 3. 20 dB Occupied Bandwidth, Low Channel



Plot 4. 20 dB Occupied Bandwidth, Mid Channel



Plot 5. 20 dB Occupied Bandwidth, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) Average Time of Occupancy (Dwell Time)

Test Requirements: Frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed. Frequency hopping systems may avoid or suppress transmissions on a particular hopping frequency provided that a minimum of 15 channels are used.

Test Remarks: The EUT meets the requirement for Average Time of Occupancy or Dwell time. The calculated result is shown in table below:

Dwell Time							
Frequency Range	No. of Channels	Hopping Period (s)	No. of Burst per Period	Burst duration (s)	Dwell Time (s)	Limit (s)	Margin
2400-2483.5	15	6	15	0.00406	0.0609	0.4	-0.3391

Table 12. Average Time of Occupancy

Dwell Time Calculation;

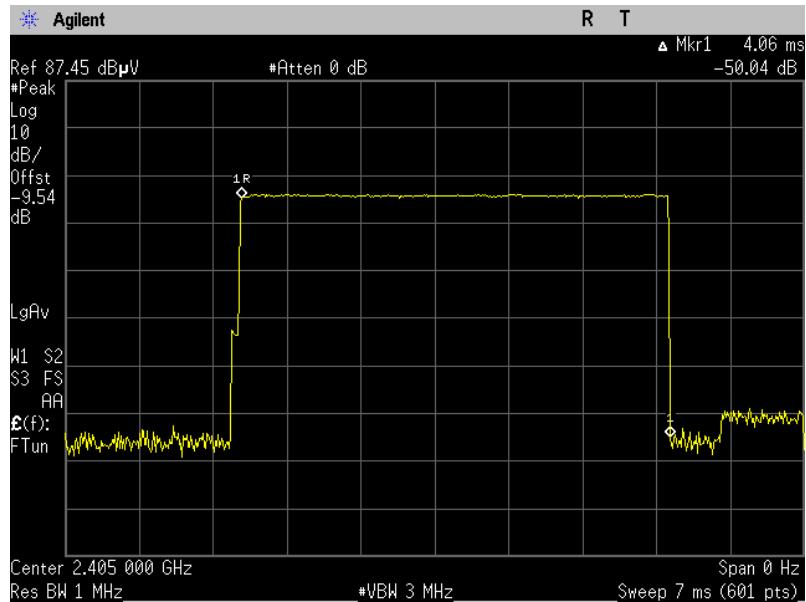
$$\text{Hopping period} = \text{Number of channel} * 0.4 = 15 * 0.4 = 6 \text{ seconds}$$

$$\text{Number of Burst} = \text{Burst per hopping period} = 15$$

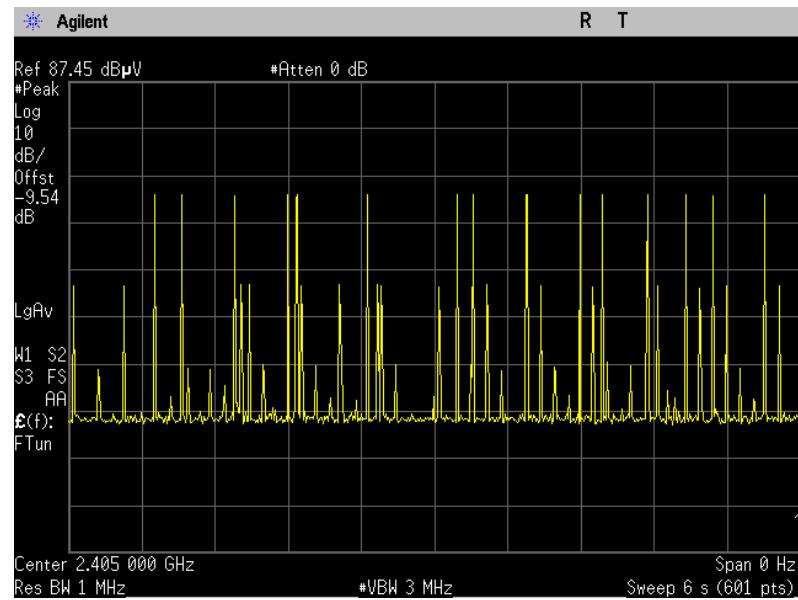
$$\text{Burst Duration} = \text{time of single burst} = 0.00406 \text{ seconds}$$

$$\text{Dwell time} = \text{Number of Burst} * \text{Burst duration} = 15 * 0.00406 = 0.0609 \text{ seconds}$$

Dwell Time



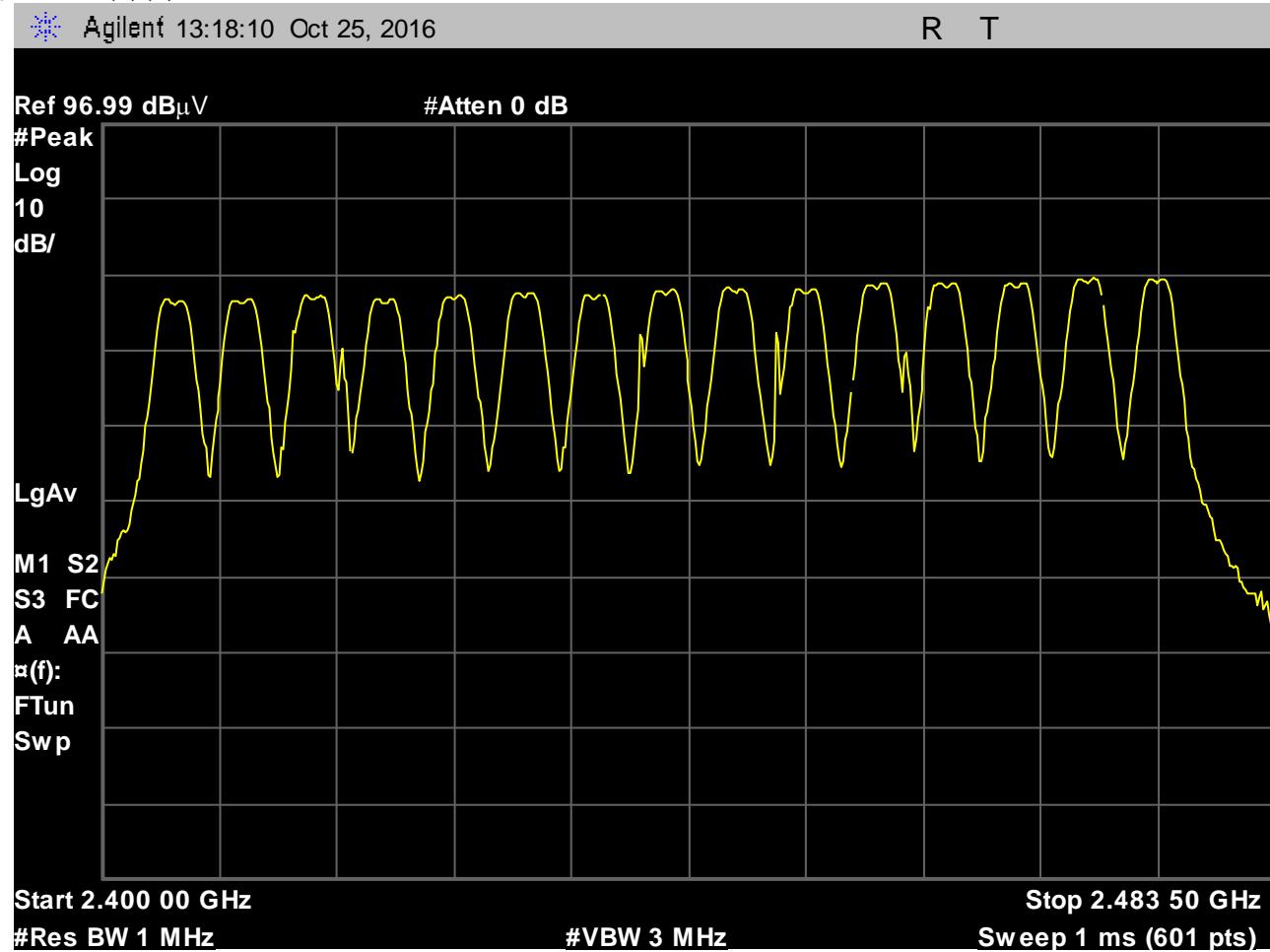
Plot 6. Dwell Time



Plot 7. Number of Burst per Period

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(1) Number of RF Channels



Plot 8. Number of Channels

Electromagnetic Compatibility Criteria for Intentional Radiators

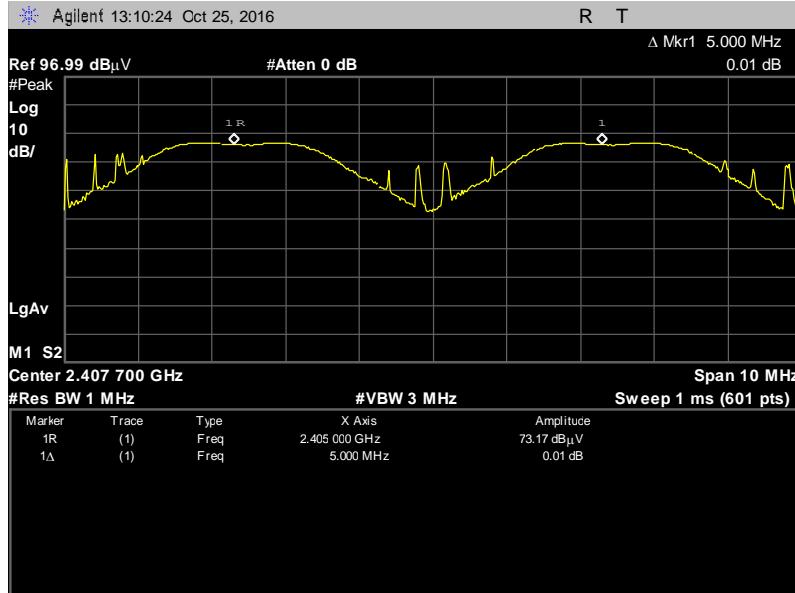
§ 15.247(a)(1) RF Channel Separation

Requirement: Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400–2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW.

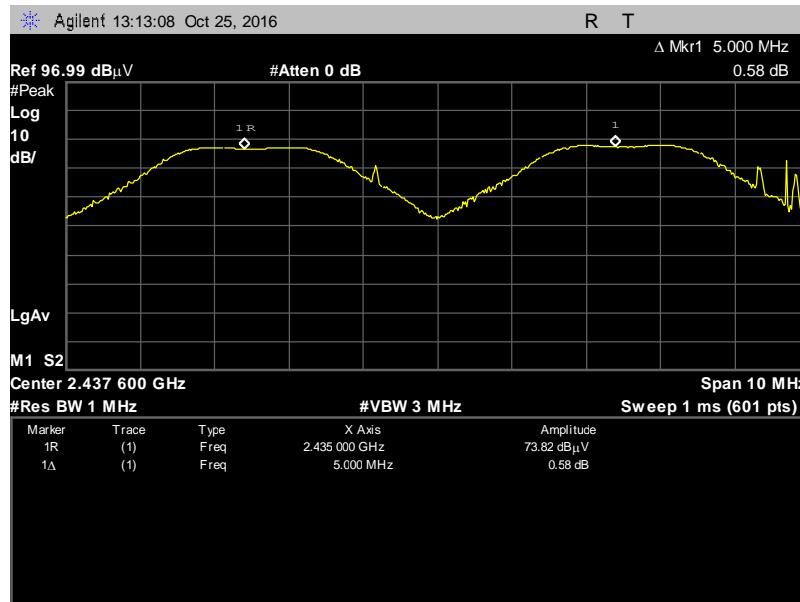
Remarks: Channel separation results are shown in table below.

Frequency Band	Channel	Channel-1 MHz	Channel -2 MHz	Separation MHz
2400-2483.5 MHz	Low Channel	2405	2410	5
	Mid Channel	2435.00	2440.00	5
	High Channel	2470	2475.00	5

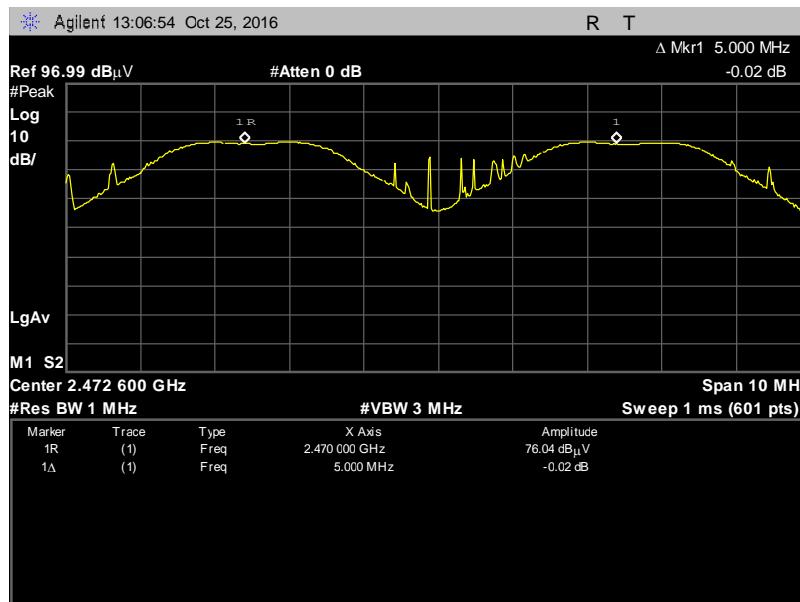
Table. Channel Separation, Test Results



Plot 9. Channel Separation, Low channel



Plot 10. Channel Separation, Mid channel



Plot 11. Channel Separation, High channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output

Test Requirements:

§15.247(b)(1): The maximum peak output power of the intentional radiator shall not exceed 0.125 Watts for frequency hopping systems operating in the 2400-2483.5 MHz band. .

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

Fixed, point-to-point operation excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

Test Procedure:

The transmitter was connected to a calibrated spectrum analyzer. The EUT was measured at the low, mid and high channels of each band. The EUT was utilizes a 3dBi dipole antenna, so the maximum power allowed is 21dBm.

Test Results:

The EUT was compliant with the Peak Power Output limits of **§15.247(b)**. No anomalies detected.

Test Engineer(s):

Donald Salguero

Test Date(s):

October 25, 2016

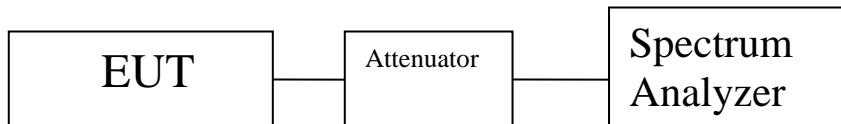


Figure 3. Peak Power Output Test Setup

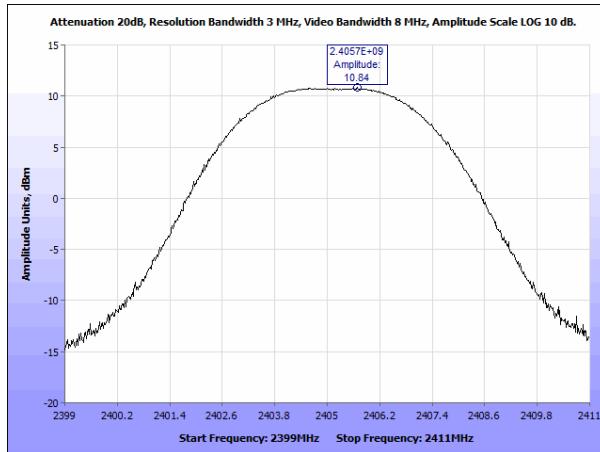
Peak Power Output Test Results

FCC-15.247 Conducted Power						
Frequency MHz	EIRP dBm	Antenna Gain dBi	Conducted Power dBm	Limit dBm	Margin dBm	Result
2405	10.84	3	7.84	21	-13.16	Pass
2440	11.16	3	8.16	21	-12.84	Pass
2474	10.9	3	7.9	21	-13.1	Pass

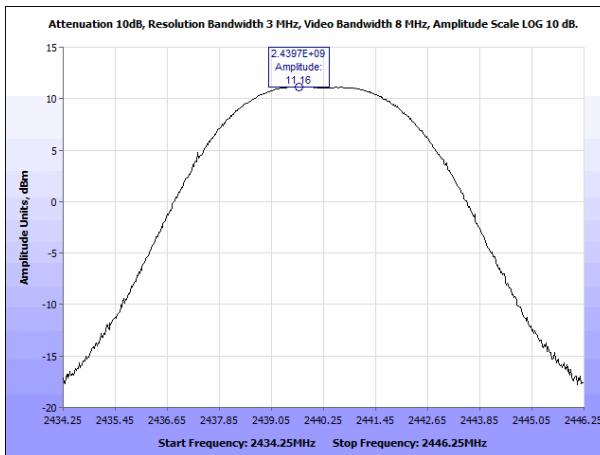
Table 13. Peak Power Output, Test Results

Note:
EIRP = Conducted Power + Antenna Gain
Hopper with 15 channel Power limit = 125mW

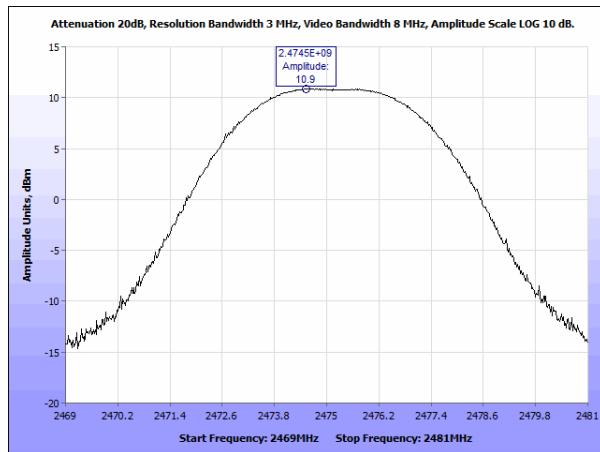
Peak Power Output Test Results



Plot 12. Peak Power Output, Low Channel



Plot 13. Peak Power Output, Mid Channel



Plot 14. Peak Power Output, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

Test Requirements: **§15.247(d); §15.205:** Emissions outside the frequency band.

§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. 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).

§15.205(a): Except as shown 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	399.9–410	4.5–5.15
¹ 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358.36.	43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	(²)

Table 14. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

Test Requirement(s): **§ 15.209 (a):** Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in Table 15.

Frequency (MHz)	§ 15.209(a), Radiated Emission Limits (dB μ V) @ 3m
30 - 88	40.00
88 - 216	43.50
216 - 960	46.00
Above 960	54.00

Table 15. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)

Test Procedure: The transmitter was set to the mid channel at the highest output power and placed on a 0.8 m high wooden table inside in a semi-anechoic chamber. 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. Measurement were repeated the measurement at the low and highest channels.

For frequencies from 30 MHz to 1 GHz, measurements were made using a quasi-peak detector with a 120 kHz bandwidth.

For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

In accordance with §15.35(b) the limit on the radio frequency emissions as measured using instrumentation with a peak detector function shall be 20 dB above the maximum permitted average limit for the frequency being investigated unless a different peak emission limit is otherwise specified in the rules.

EUT Field Strength Final Amplitude = Raw Amplitude – Preamp gain + Antenna Factor + Cable Loss – Distance Correction Factor

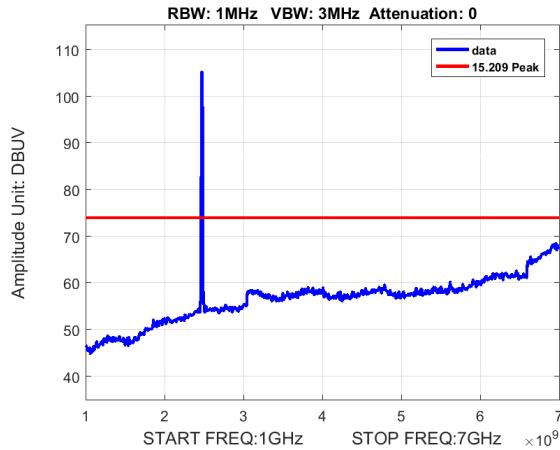
Test Results: The EUT was compliant with the Radiated Spurious Emission limits of **§15.247(d)**. The measurement plots shown below, range from 30MHz to 18GHz. Above 18GHz only noise floor was observed.

Test Engineer(s): Donald Salguero

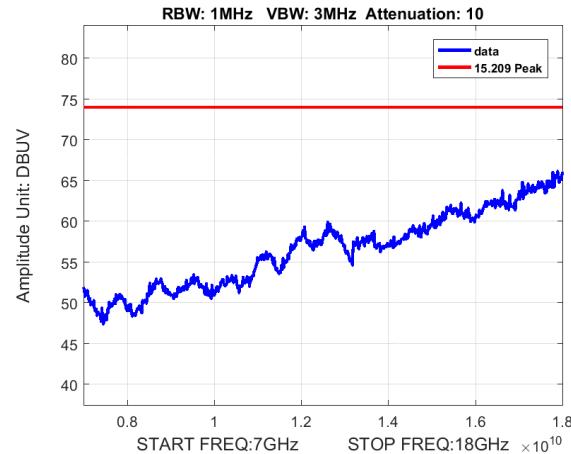
Test Date(s): November 11, 2016

Radiated Spurious Emissions Test Results

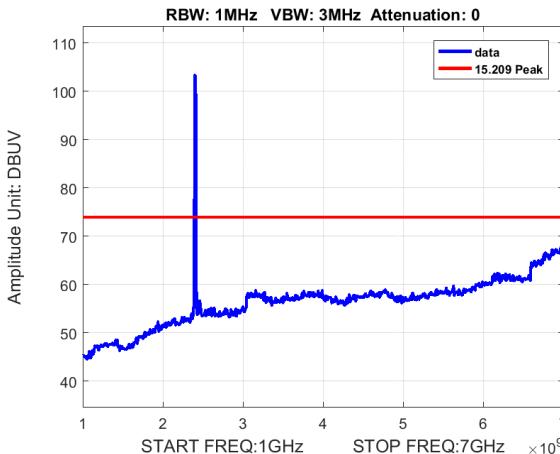
15.209 Radiated Emissions – up to 10th Harmonic



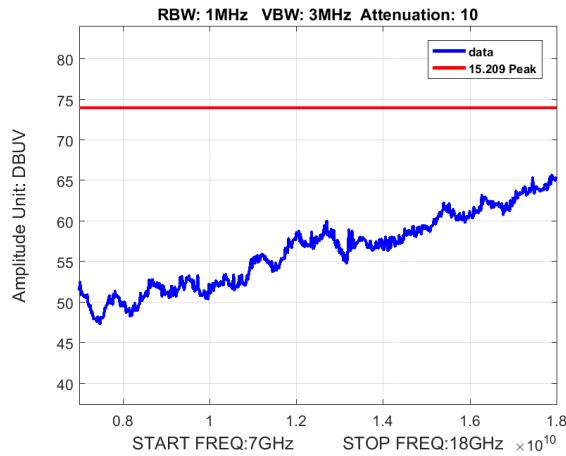
Plot 15. Peak Radiated Spurious Emissions up to 10th Harmonic, 1-7GHz, Ch. High



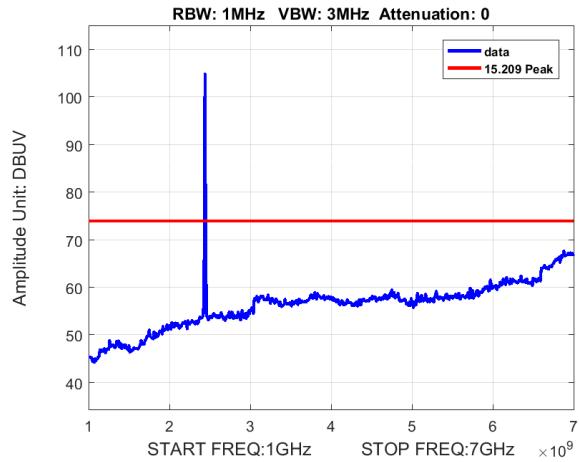
Plot 16. Peak Radiated Spurious Emissions up to 10th Harmonic, 7-18GHz, Ch. High



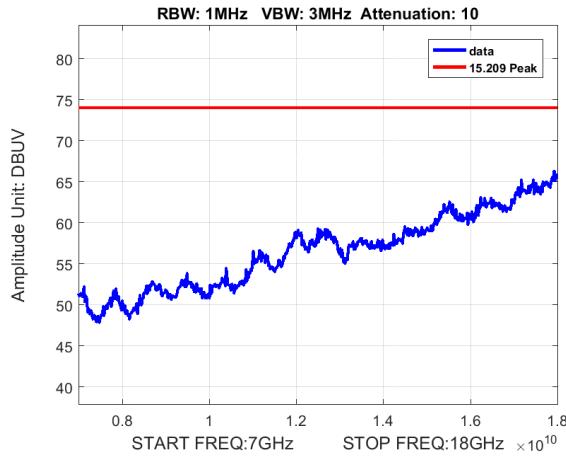
Plot 17. Peak Radiated Spurious Emissions up to 10th Harmonic, 1-7GHz, Ch. Low



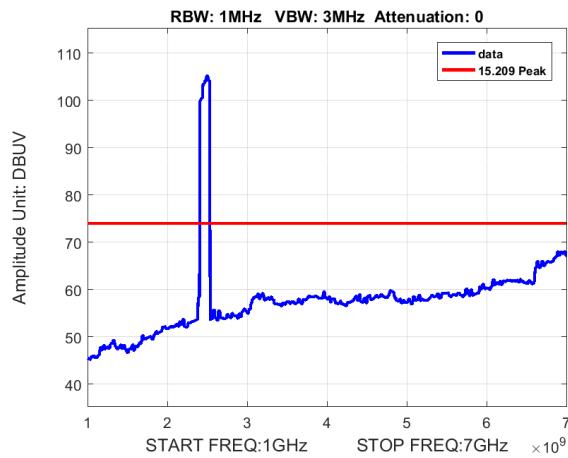
Plot 18. Peak Radiated Spurious Emissions up to 10th Harmonic, 7-18GHz, Ch. Low



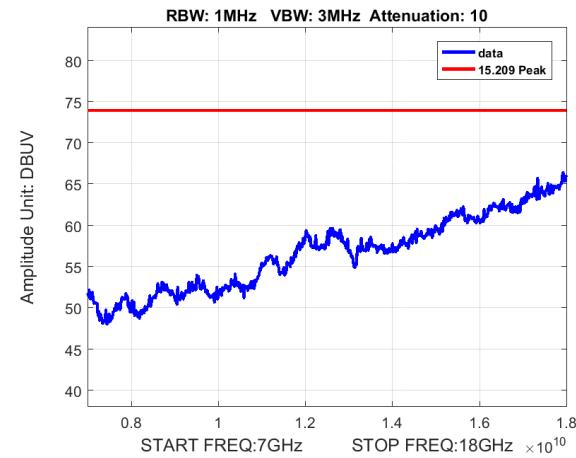
Plot 19. Peak Radiated Spurious Emissions up to 10th Harmonic, 1-7GHz, Ch. Mid



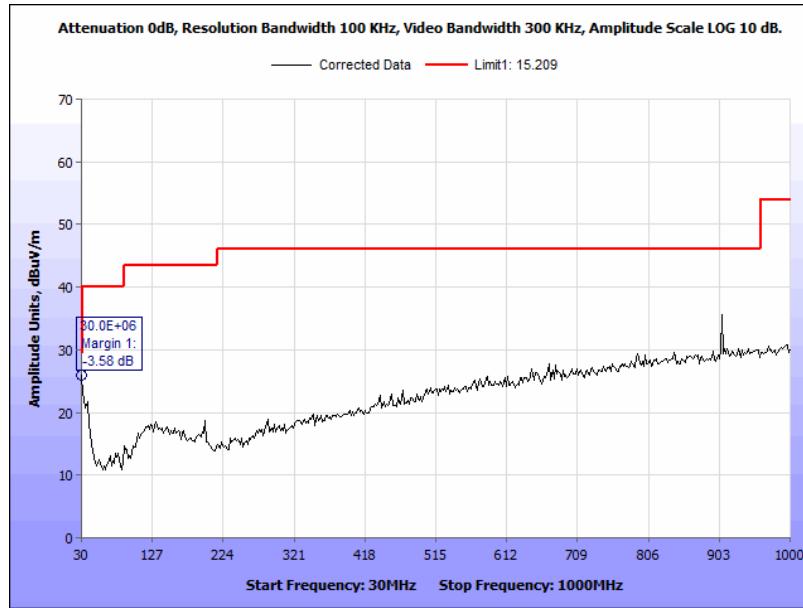
Plot 20. Peak Radiated Spurious Emissions up to 10th Harmonic, 7-18GHz, Ch. Mid



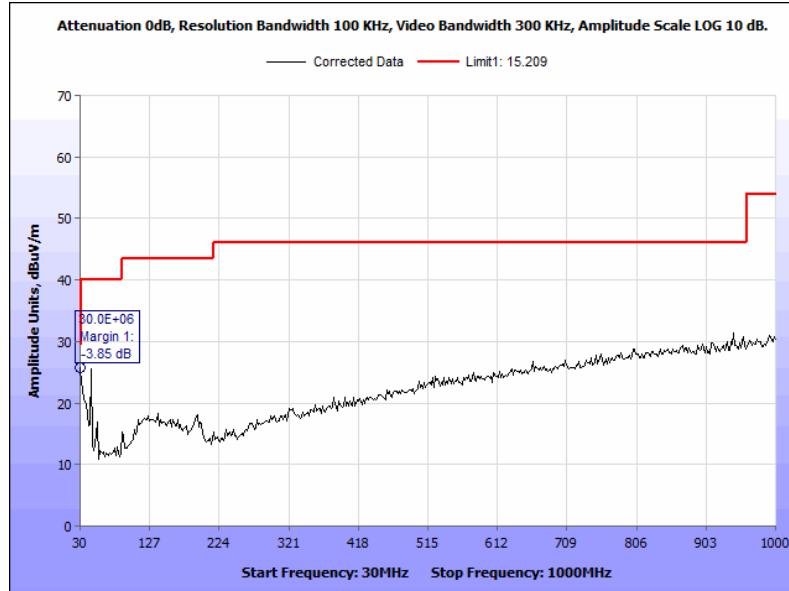
Plot 21. Peak Radiated Spurious Emissions up to 10th Harmonic, 1-7GHz, Hopping



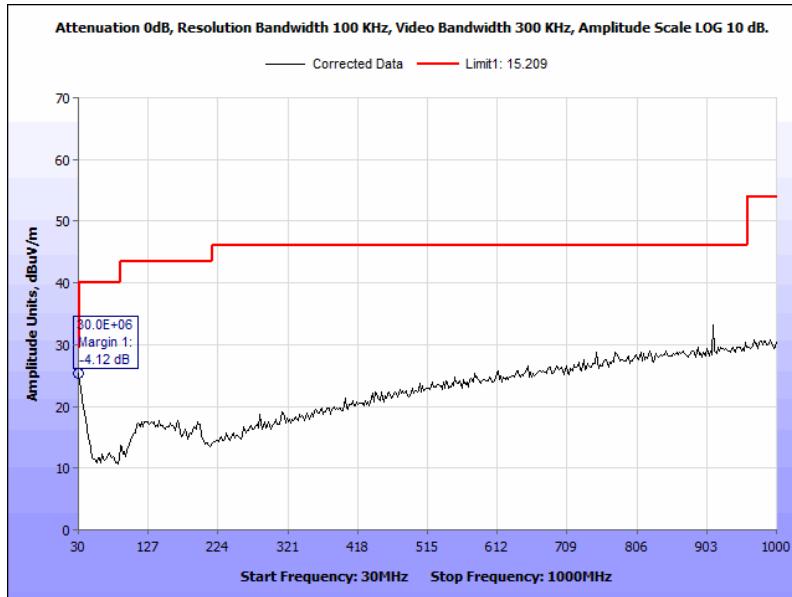
Plot 22. Peak Radiated Spurious Emissions up to 10th Harmonic, 7-18GHz, Hopping



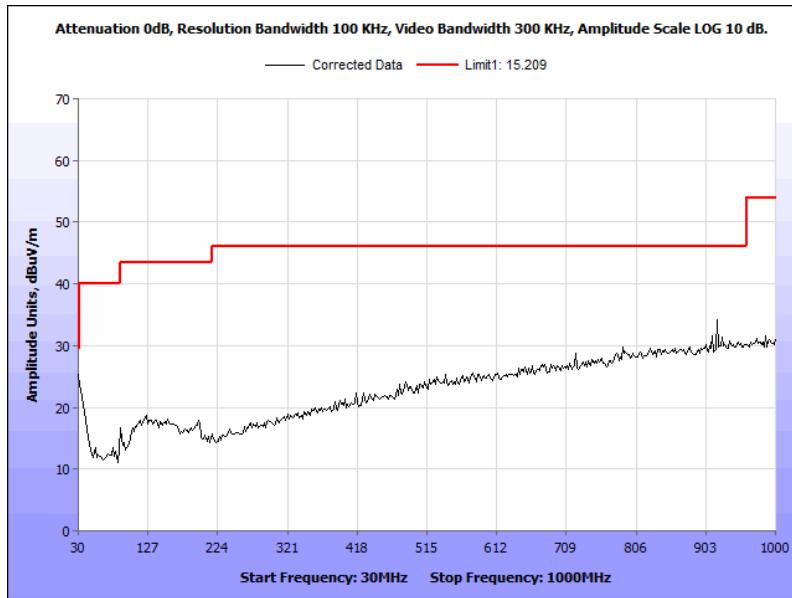
Plot 23. Radiated Spurious Emissions up to 10th Harmonic, 30Mhz-1GHz, Ch. High



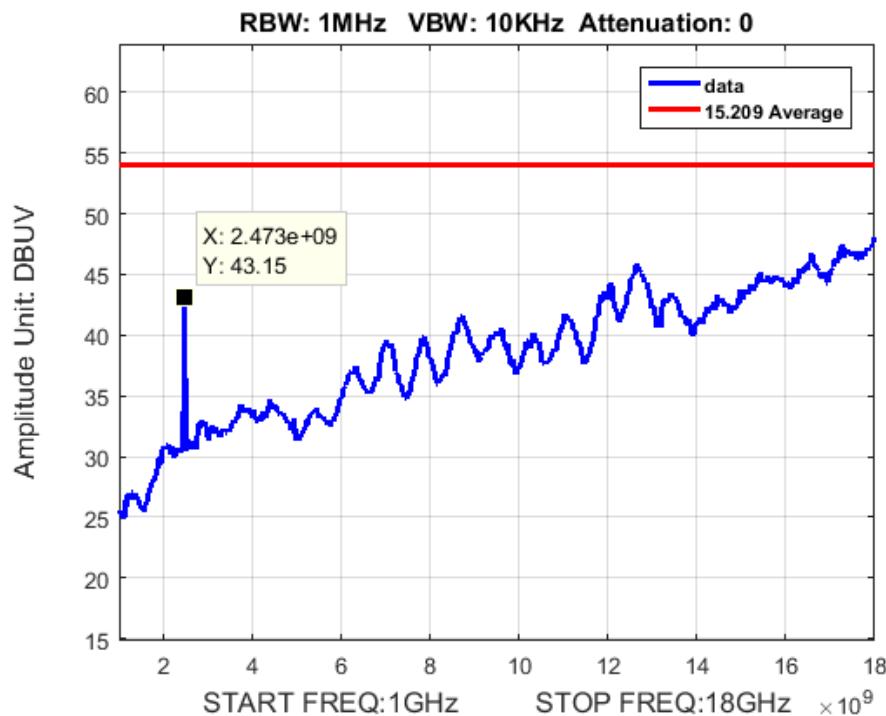
Plot 24. Radiated Spurious Emissions up to 10th Harmonic, 30Mhz-1GHz, Ch. Low



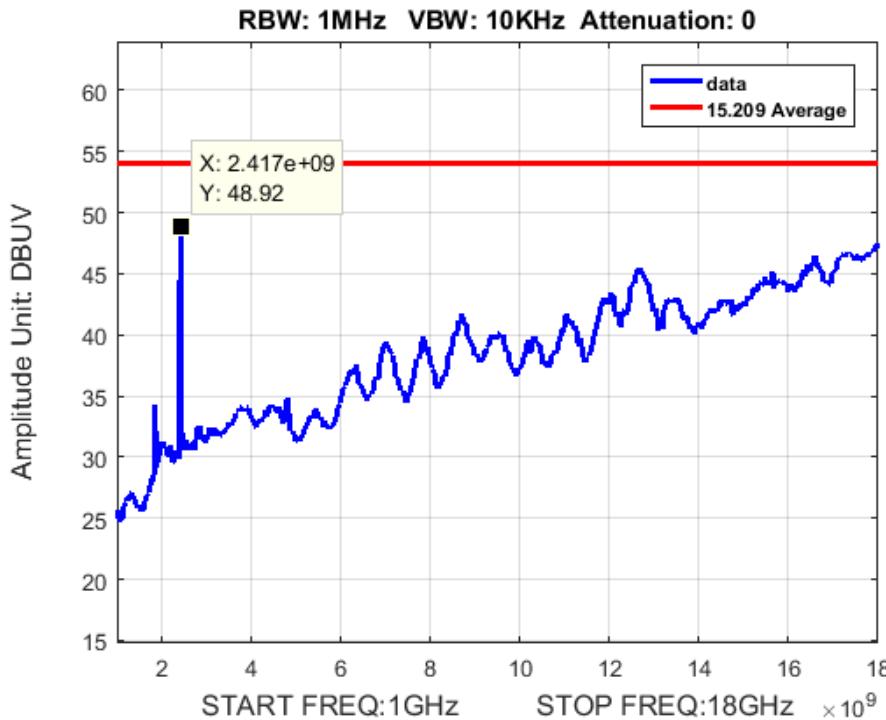
Plot 25. Radiated Spurious Emissions up to 10th Harmonic, 30Mhz-1GHz, Ch. Mid



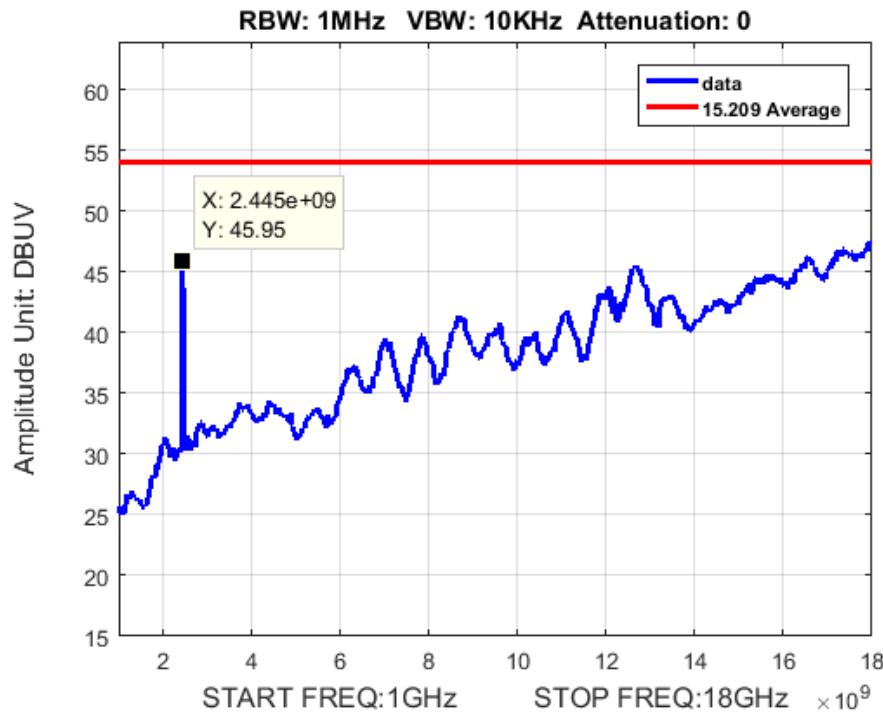
Plot 26. Radiated Spurious Emissions up to 10th Harmonic, 30Mhz-1GHz, Hopping



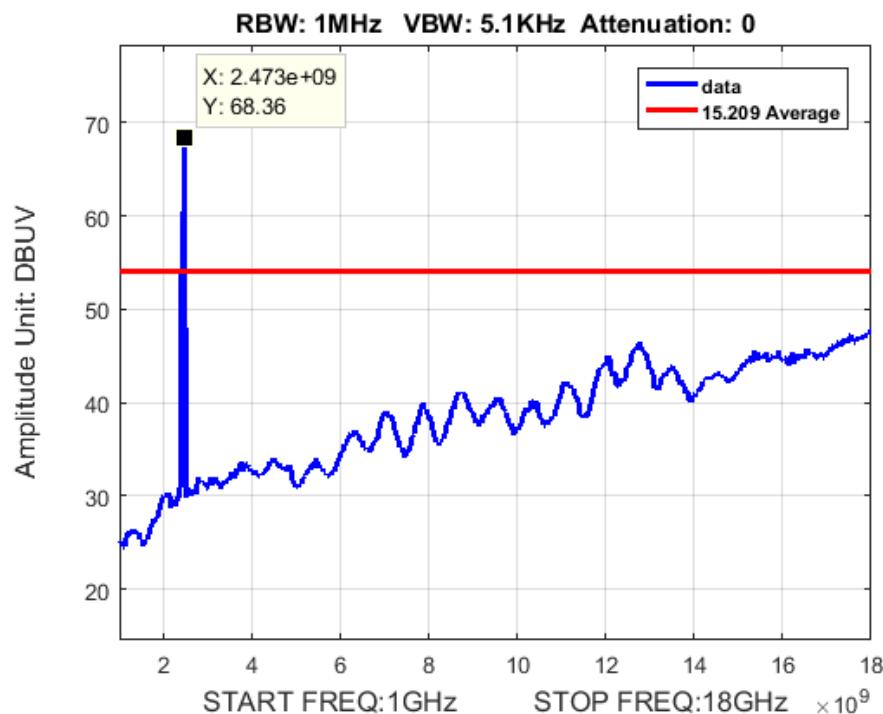
Plot 27. Average Radiated Spurious Emissions up to 10th Harmonic, 1-18GHz, Ch. High



Plot 28. Average Radiated Spurious Emissions up to 10th Harmonic, 1-18GHz, Ch. Low



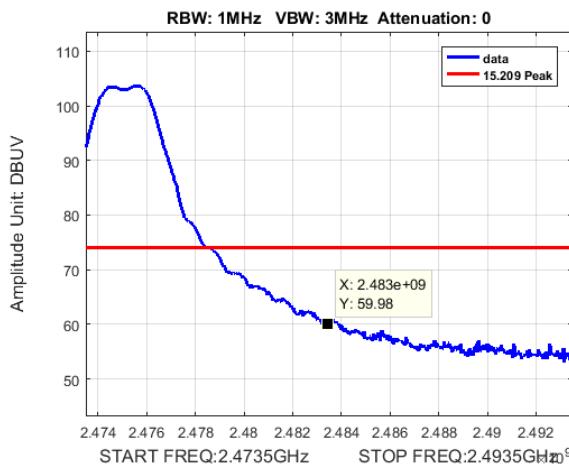
Plot 29. Average Radiated Spurious Emissions up to 10th Harmonic, 1-18GHz, Ch. Mid



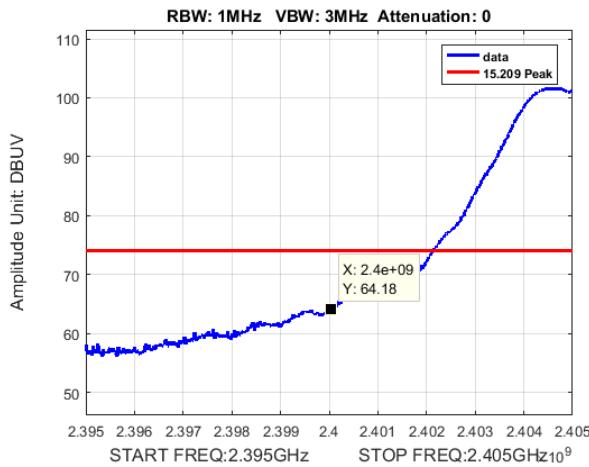
Plot 30. Average Radiated Spurious Emissions up to 10th Harmonic, 1-18GHz, Hopping

Test Procedures for Radiated Band Edge

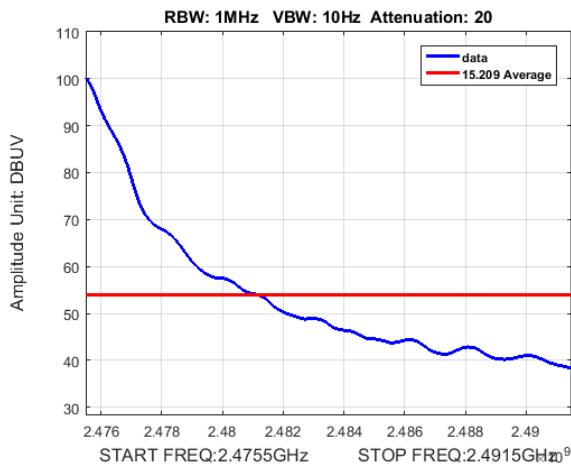
Test Procedures: The transmitter was turned. Measurements were performed of the low and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance.



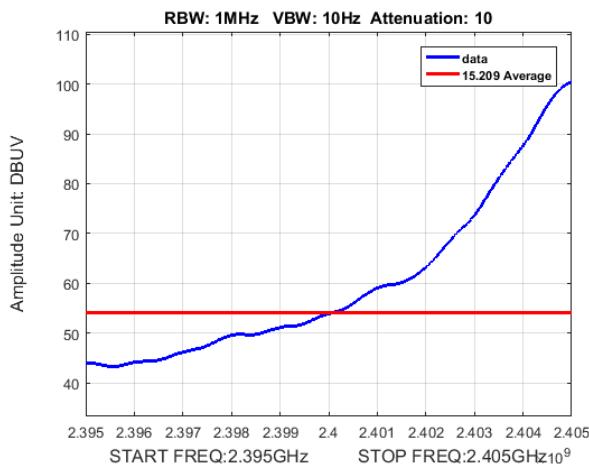
Plot 31. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Peak, Ch. High



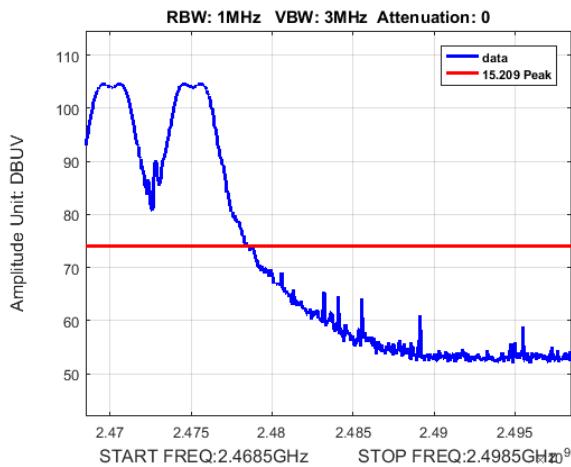
Plot 32. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Peak, Ch. Low



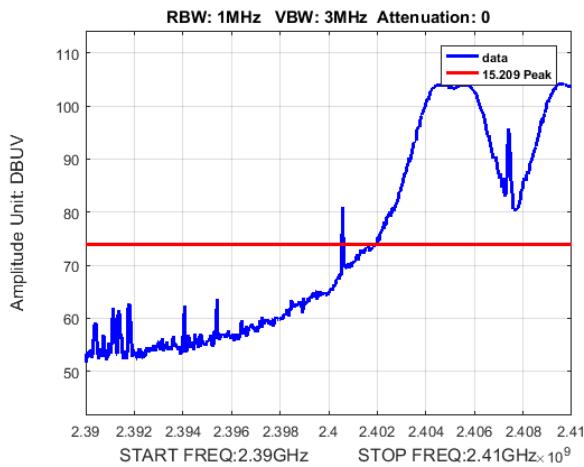
Plot 33. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Average, Ch. High



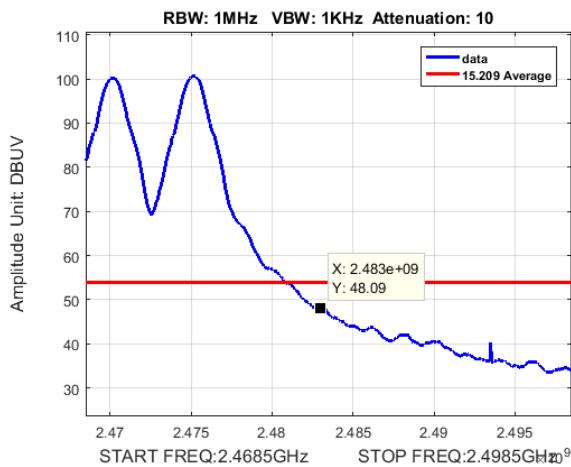
Plot 34. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Average, Ch. Low



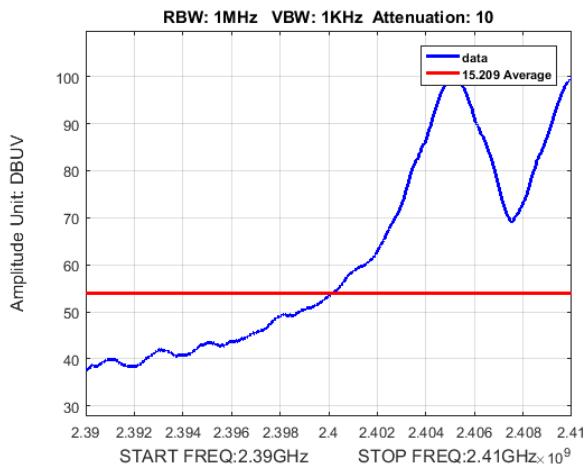
Plot 35. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Peak, Ch. High, Hopping



Plot 36. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Peak, Ch. Low, Hopping



Plot 37. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Average, Ch. High, Hopping



Plot 38. Radiated Spurious Emissions up to 10th Harmonic, Band Edge, Average, Ch. Low, Hopping

Radiated Spurious Emissions Test Setup



Photograph 3. Radiated Spurious Emissions, Below 1GHz, Test Setup



Photograph 4. Radiated Spurious Emissions, Above 1GHz, Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

Test Requirement:

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.

Test Procedure:

For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

See following pages for detailed test results with RF Conducted Spurious Emissions.

Test Results:

The EUT was compliant with the Conducted Spurious Emission limits of **§15.247(d)**. Measured emissions were within applicable limits. The emissions were investigated up to 18 GHz and they were attenuated by 20 dB or more below the carrier.

Test Engineer(s):

Donald Salguero

Test Date(s):

November 1, 2016

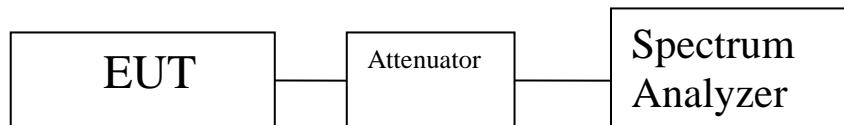
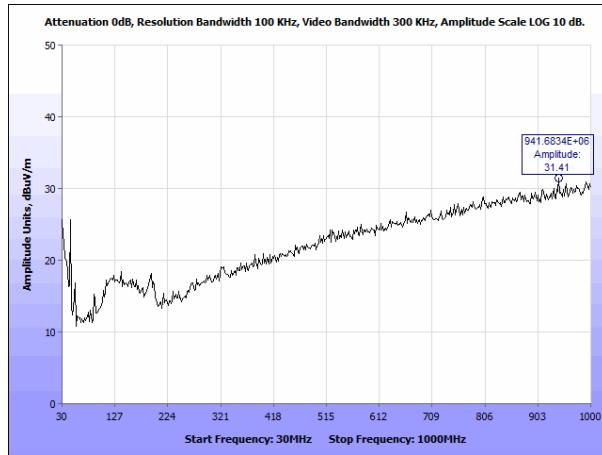
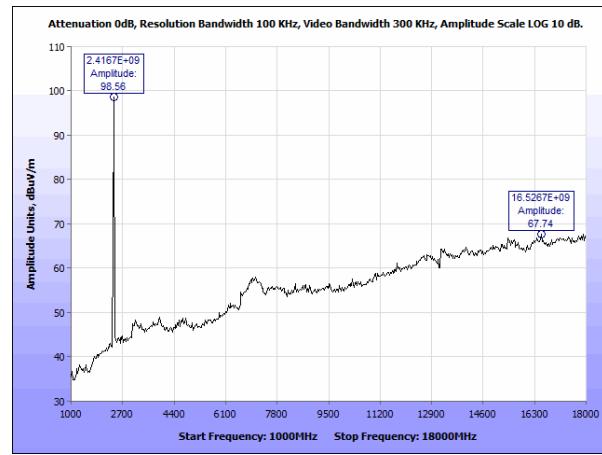


Figure 4. Block Diagram, Conducted Spurious Emissions Test Setup

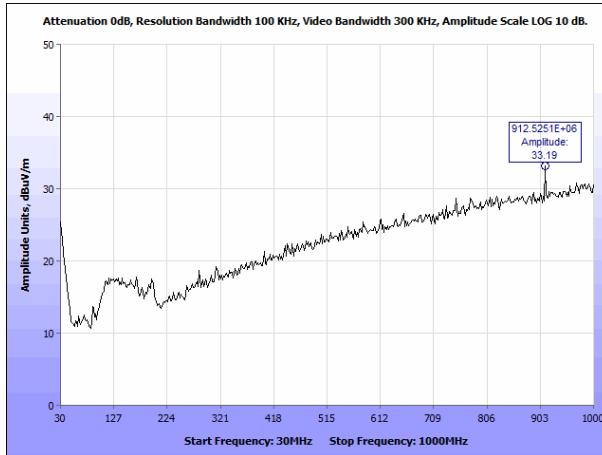
Conducted Spurious Emissions Test Results



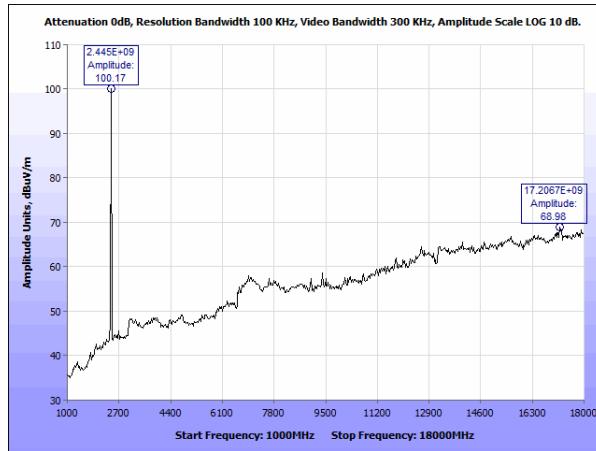
Plot 39. Conducted Spurious Emissions, Low Channel, 100k, 30 MHz – 1 GHz



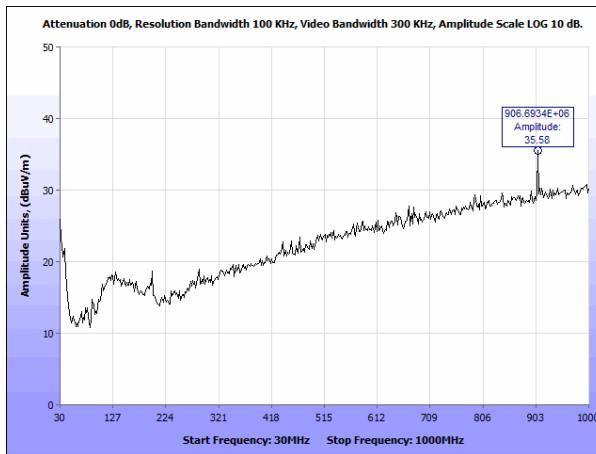
Plot 40. Conducted Spurious Emissions, Low Channel, 100k, 1 GHz – 18 GHz



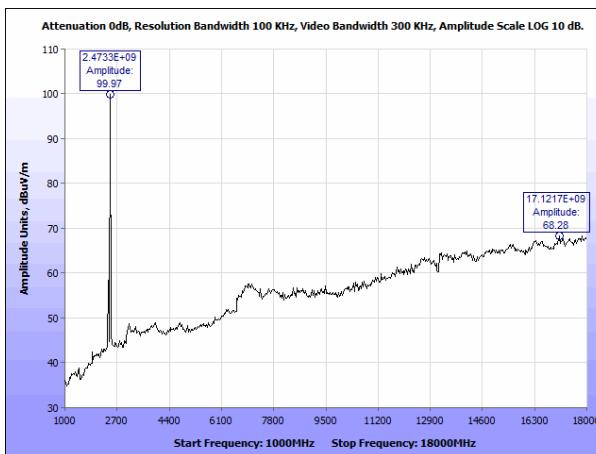
Plot 41. Conducted Spurious Emissions, Mid Channel, 100k, 30 MHz – 1 GHz



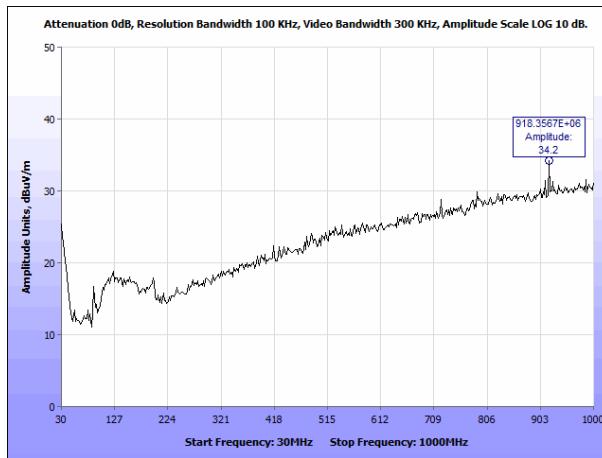
Plot 42. Conducted Spurious Emissions, Mid Channel, 100k, 1 GHz – 18 GHz



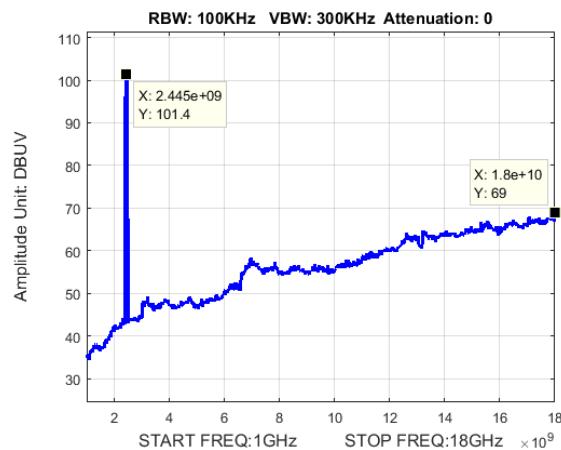
Plot 43. Conducted Spurious Emissions, High Channel, 100k, 30 MHz – 1 GHz



Plot 44. Conducted Spurious Emissions, High Channel, 100k, 1 GHz – 18 GHz

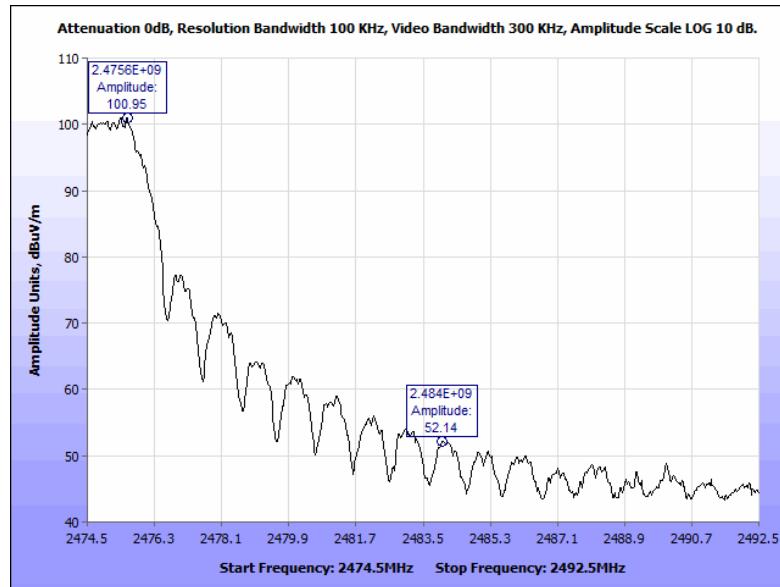


Plot 45. Conducted Spurious Emissions, Hopping, 100k, 30 MHz – 1 GHz

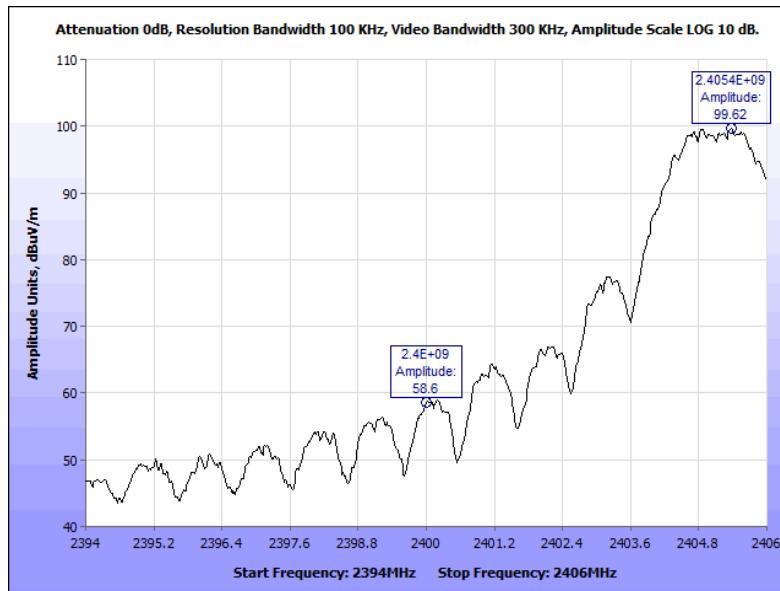


Plot 46. Conducted Spurious Emissions, Hopping, 100k, 1 GHz – 18 GHz

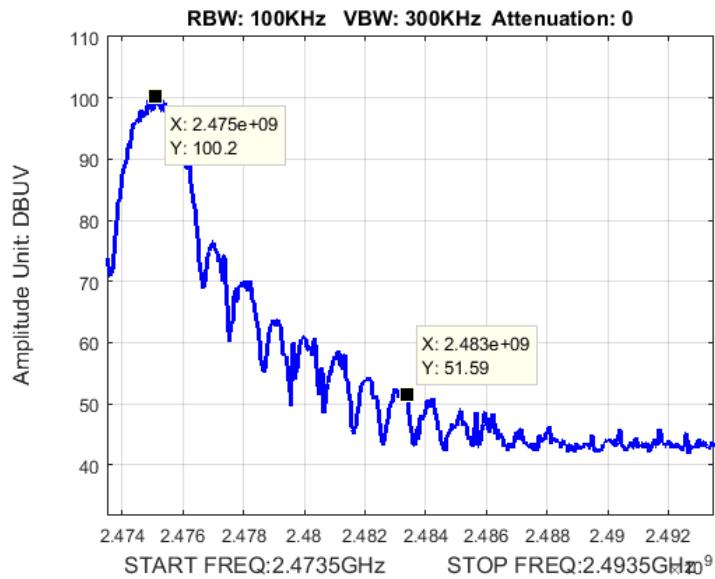
Conducted Band Edge Test Results



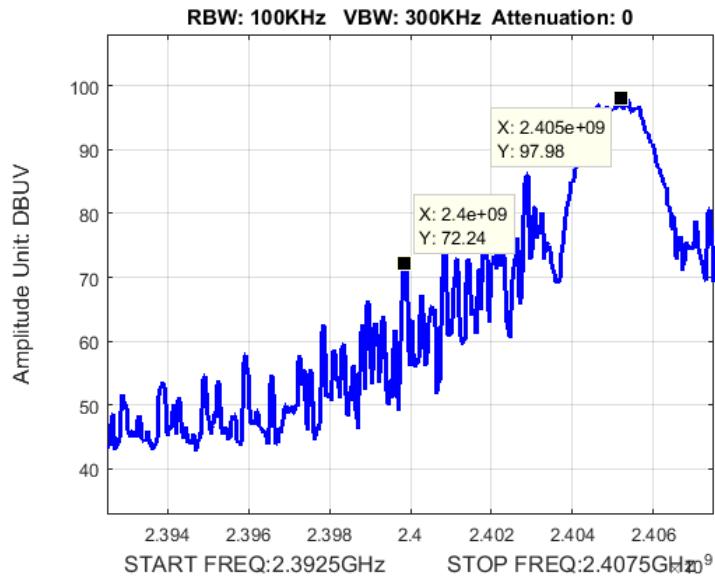
Plot 47. Conducted Band Edge, High Ch, 100k



Plot 48. Conducted Band Edge, Low Ch, 100k



Plot 49. Conducted Band Edge, Hopping, High Ch. 100k



Plot 50. Conducted Band Edge, Hopping, Low Ch. 100k

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(g)(h) Declaration Statements for FHSS

Intelligent Automation, Inc.

15400 Calhoun Drive ▲ Suite 190 ▲ Rockville, MD 20855
Tel 301-294-5200 ▲ Fax 301-294-5201 ▲ www.i-a-i.com



December 15, 2016

MET Laboratories, Inc.
914 West Patapsco Avenue
Baltimore, MD 21230

RE: FHSS Declaration Statement Letter for "GRIDLOCK" module, FCC ID 2AI6Y-
GRIDLOCK with respect to FCC Part 15C Sections 15.247(g) and 15.247(h)

To Whom It May Concern:

Compliance for section 15.247(g):

The 2.4GHz system-on-chip (SoC) within the GRIDLOCK modular device complies with the IEEE 802.15.4e standard and uses a Time Synchronized Channel Hopping (TSCH) MAC. According to this specification, the SoC transmits packets with a pseudorandom hopping pattern across 15 channels when presented with continuous data. Short burst transmissions from the system are also transmitted with pseudorandom frequency hopping.

Compliance for section 15.247(h):

The IEEE 802.15.4e compliant SoC does not use intelligence to adapt its hopset to avoid occupied channels, and it does not coordinate with any other FHSS systems to avoid simultaneous occupancy of individual hopping frequencies by multiple transmitters.

Please contact me if there is any information you may need.

Sincerely yours,

David Mayhew
Principal Engineer
Intelligent Automation, Inc.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(i) Maximum Permissible Exposure

RF Exposure Requirements: **§1.1307(b)(1) and §1.1307(b)(2):** 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 levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: **§1.1310:** As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

FCC									
Frequency (MHz)	Con. Pwr. (dBm)	Con. Pwr. (mW)	Ant. Gain (dBi)	Ant. Gain numeric	Pwr. Density (mW/cm ²)	Limit (mW/cm ²)	Margin	Distance (cm)	Result
2405	7.84	6.081	3	1.995	0.00241	1	0.99759	20	Pass
2440	8.16	6.546	3	1.995	0.0026	1	0.9974	20	Pass
2474	7.9	6.166	3	1.995	0.00245	1	0.99755	20	Pass

Result: SAR testing is not required.

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
1T414 9	HIGH-FREQUENCY ANECHOIC CHAMBER	RAY PROOF	81		NOT REQUIRED
1T430 0	SEMI-ANECHOIC CHAMBER # 1 (NSA)	EMC TEST SYSTEMS	NONE	2/6/2015	2/6/2018
1T440 9	EMI RECEIVER	ROHDE & SCHWARZ	ESIB7	11/29/2014	11/29/2016
1T444 2	PRE-AMPLIFIER, MICROWAVE	MITEQ	AFS42-01001800-30-10P		SEE NOTE
1T448 3	ANTENNA; HORN	ETS-LINDGREN	3117	10/8/2015	4/8/2017
1T475 1	ANTENNA - BILOG	SUNOL SCIENCES	JB6	2/26/2016	8/26/2017
1T477 1	PSA SPECTRUM ANALYZER	AGILENT TECHNOLOGIES	E4446A	8/10/2016	2/10/2018

Table 16. Test Equipment List

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

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.

(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.

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

1. 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.

End of Report