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Uhlmann & Zacher GmbH  
Electronic Door Handle  
EDH420

47 CFR Part 15, §15.225 (partly)  
47 CFR Part 15, §15.247 (partly)  
RSS-210 (partly)  
RSS-247 (partly)

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## **1 General remark**

According to ANSI C63.10-2013 clause 5.10.6:

If the individual devices in a composite system are subject to different regulatory technical requirements, then each part of the system shall comply with its specific technical requirement. In no event shall the measured emissions of the composite system exceed the highest level permitted for an individual component.

For a composite system, testing for compliance shall be performed with all of the parts in the system functioning. If an unlicensed wireless device incorporated more than one antenna or other radiating source and these radiating sources are designed to emit at the same time, then measurements of conducted and radiated emissions shall be performed with all radiating sources emitting simultaneously. If the composite system contains an unintentional radiator, then that part of the composite system shall be tested in accordance with the test procedures in the latest version of ANSI C63.4, as accepted by the appropriate regulatory agency.

Therefore this test report contains only partial measurements according to the following 47 CFR parts and IC radio standards.

## 2 Summary of test results

### 2.1 15.225 and RSS-210

System type: RFID Reader

47 CFR part and section	Test	Equivalent to IC radio standard(s)	Page	Result	Note(s)
15.225 (a) – (c)	Operation within the band 13.110 MHz – 14.010 MHz	RSS-210 section B.6 (a) I-III	32	Passed	---
15.225(d)	Radiated emissions below 30 MHz	RSS-210, section B.6 (a) IV	34	Passed	---
15.225(d)	Radiated emissions from 30 MHz to 1 GHz	RSS-210, section B.6 (a) IV	38	Passed	---
15.225(d)	Radiated emissions from 1 GHz to 25 GHz (10 <sup>th</sup> harmonic)	RSS-210, section B.6 (a) IV	41	Passed	2, 3

Note(s):

- 1 For information about EUT see clause 4.
- 2 Only applicable if the 10th harmonic of the intentional transmitter is beyond 1 GHz and the highest frequency of the unintentional part is  $\geq 108$  MHz (please see 47 CFR Part 15, § 15.33(a) and (b), and RSS-Gen, section 6.13.2)
- 3 According to 47 CFR Part 15, §15.33 (a)(5) and RSS-Gen, section 6.13.2 (d), the frequency range of investigation for the digital device shall be used if the range of investigation determined by the highest internal frequency of the digital device is higher than the 10<sup>th</sup> harmonic of the intentional radiator

## 2.2 15.247 and RSS-247

System type: Digital transmission system (DTS)

47 CFR part and section	Test	Equivalent to IC radio standard(s)	Page	Result	Note(s)
15.247(b)	Calculated conducted output power	RSS-247, section 5.4	29	Passed	---
15.247(d)	Radiated emissions below 30 MHz	RSS-247, section 5.5	32	Passed	---
15.247(d)	Radiated emissions from 30 MHz to 1 GHz	RSS-247, section 5.5	38	Passed	---
15.247(d)	Radiated emissions from 1 GHz to 25 GHz (10 <sup>th</sup> harmonic)	RSS-247, section 5.5	41	Passed	---
15.247(i)	Radio frequency radiation exposure	RSS-Gen, Section 3.4	---	Not performed	4

Note(s):

- 1 For information about EUT see clause 4.
- 2 Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.
- 3 If antenna port conducted tests cannot be performed (e.g. for portable or handheld devices with integral antenna), then radiated tests are performed for demonstrating compliance to the conducted emission requirements (see "Spurious radiated emissions 9 kHz to 10<sup>th</sup> harmonic").
- 4 Radio frequency radiation exposure is in consideration in another test report.

Straubing, August 16, 2023



Tested by  
Konrad Graßl  
Department Manager Radio



Approved by  
Christian Kiermeier  
Reviewer

### 3 Referenced publications

<i>Publication</i>	<i>Title</i>
CFR 47 Part 2 October 2022	Code of Federal Regulations, Title 47 (Telecommunication), Part 2 (Frequency allocation and radio treaty matters; General rules and regulations) of the Federal Communication Commission (FCC)
CFR 47 Part 15 October 2022	Code of Federal Regulations, Title 47 (Telecommunication), Part 15 (Radio Frequency Devices) of the Federal Communication Commission (FCC)
KDB Publication no. 412172 August 7, 2015	Guidelines for determining the Effective Radiated Power (ERP) and Equivalent Isotropically Radiated Power (EIRP) of an RF transmitting system
KDB Publication no. 558074 April 02, 2019	Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS), Frequency Hopping Spread Spectrum Sytem, and Hybrid System Devices Operating Under §15.247 of the FCC Rules
ANSI C63.10 June 2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
RSS-Gen Issue 5 April 2018 Amendment 1 (March 2019) Amendment 2 (February 2021)	Spectrum Management and Telecommunications - Radio Standards Specification - General Requirements for Compliance of Radio Apparatus
RSS-210 Issue 10, December 2019 Amendment (April 2020)	Spectrum Management and Telecommunications Radio Standards Specification Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment
RSS-247, Issue 2 February 2017	Spectrum Management and Telecommunications - Radio Standards Specification - Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices



## 4 Equipment under test (EUT)

All Information in this clause is declared by customer.

### 4.1 General information

Product type:	Electronic Door Handle		
Model name:	EDH420		
Serial number(s):	0010E00C		
Manufacturer:	Uhlmann & Zacher GmbH		
Version:	Hardware:	4.2.2	
	Software:	edh_nrf_CPR_HW4_2_0_DTM_app.hex	
Short description:	EUT is a door handle with a Bluetooth Low Energy module operating in the 2.4 GHz band. The EUT also employs 13.56 MHz.		
Additional modifications:	None		
FCC ID:	2APV6-EDH420		
IC registration number:	24382-EDH420		
Power supply:	Battery supply		
	Nominal voltage:	3 V	
Device type:	<input checked="" type="checkbox"/> Portable	<input type="checkbox"/> Mobile	<input type="checkbox"/> Fixed

## 4.2 Radio specifications

### RF technology 1:

System type:	RFID Reader		
Application frequency band:	13.110 MHz – 14.010 MHz		
Operating frequencies:	13.56 MHz		
Number of RF channels	1		
Highest internal frequency:	2480 MHz		
Modulation	ASK		
Antenna:	Type:	Loop antenna	
	Connector:	<input type="checkbox"/> external <input type="checkbox"/> temporary	<input type="checkbox"/> internal <input checked="" type="checkbox"/> none (integral antenna)

## RF technology 2:

System type:	Digital transmission system (DTS)		
Application frequency band:	2400.0 MHz - 2483.5 MHz		
Number of RF channels:	40		
Nominal bandwidth:	2 MHz		
Modulation(s):	GFSK		
Antenna:	Type:	PCB antenna	
	Gain:	-5.58 dBi at 2402 MHz -7.20 dBi at 2440 MHz -5.59 dBi at 2480 MHz	
	Connector:	<input type="checkbox"/> external <input type="checkbox"/> temporary	<input type="checkbox"/> internal <input checked="" type="checkbox"/> none (integral antenna)

<i>Channel</i>	<i>Frequency (MHz)</i>
Low	2402
Middle	2426
High	2480

Table 1: Tested channel(s)

### Note(s):

- The EUT was in continuous advertising mode (frequency hopping between 2402 MHz, 2426 MHz and 2480 MHz).

## 4.3 Photo documentation

For external photos of the EUT see annex B, for internal ones see annex C.  
 Photos taken during testing including EUT positions can be found in annex A.

## 5 Test configuration and mode of operation

### 5.1 Test configuration

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
Electronic Door Handle	EDH420	0010E00C	Uhlmann & Zacher GmbH

Table 2: EUT used for testing

<i>Device</i>	<i>Type designation</i>	<i>Serial or inventory no.</i>	<i>Manufacturer</i>
RFID-tag	13.56 MHz	---	Elatec GmbH

Table 3: Support equipment used for testing

### 5.2 Mode of operation

The EUT was in continuous interrogation mode at 13.56 MHz. Simultaneously the EUT was in continuous advertising mode.

---

## **6 Test procedures**

### **6.1 General specifications**

#### **6.1.1 Test setups**

Tabletop devices are placed on a non-conductive table with a height of 0.8 m. In case of AC power-line conducted emissions test, the rear of the EUT is located 40 cm to the vertical wall of the RF-shielded (screened) room which is used as vertical conducting plane. For radiated emission measurements above 1 GHz, tabletop devices are placed at a height of 1.5 m above the floor using a support made of styrene placed on top of the non-conductive table.

All other surfaces of tabletop or floor-standing EUTs are at least 80 cm from any other grounded conducting surface. This includes the case or cases of one or more LISNs when performing an AC power-line conducted emissions test.

Radiated emission measurements of equipment that can be used in multiple orientations (e.g. portable or handheld devices) are performed with the EUT in each of three orthogonal axis positions.

#### **6.1.2 Conversion to conducted test results**

If test procedures described herein are based on the use of an antenna-port conducted test configuration, but the EUT cannot provide such a configuration (e.g., portable or handheld devices with integral antenna), radiated tests are performed for demonstrating compliance to the conducted requirements.

If a radiated test configuration has to be used, then the measured power or field strength levels are converted to equivalent conducted power levels for comparison to the applicable limit. For this purpose, at first the radiated field strength or power levels are converted to EIRP as described in annex G of ANSI C63.10 and KDB Publication 412172, document D01. The equivalent conducted power is then determined by subtracting the EUT transmit antenna gain from the EIRP (assuming logarithmic representation).

For devices utilizing multiple antenna technologies, KDB Publication 662911 applies.

## 6.2 Antenna-port conducted measurements

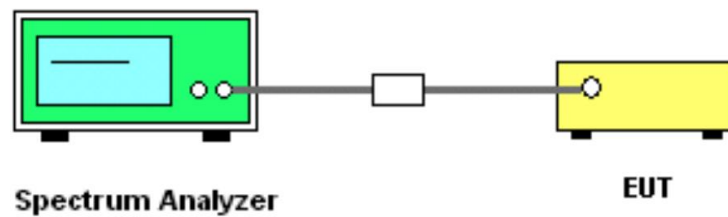


Figure 1: Setup for antenna-port conducted measurements

The RF signal of the EUT is measured conducted at the antenna port. In case of no permanent antenna connector available, a temporary antenna connector should be supplied by the manufacturer. The specific insertion loss of the signal path, which is matched to 50 Ohm, is determined. The test receiver is set to analyzer mode with pre-selector activated. The measurement readings on the test receiver are corrected by the signal path loss.

For frequency hopping systems (FHSS) and digital transmission systems (DTS) the settings as specified by KDB Publication 558074, document D01, are used.

If a radiated test configuration has to be used, conversion to conducted test results is performed according to clause 6.1.2.

## 6.3 AC powerline conducted emissions

AC power-line conducted emissions are measured according to clause 6.2 of ANSI C63.10 over the frequency range from 150 kHz to 30 MHz to determine the line-to-ground radio-noise voltage that is conducted from all of the EUT current-carrying power input terminals that are directly (or indirectly via separate transformers or power supplies) connected to a public power network. The tests are performed in a shielded room.

If the EUT normally receives power from another device that in turn connects to the public utility ac power lines, measurements are made on that device with the EUT in operation to demonstrate that the device continues to comply with the appropriate limits while providing the EUT with power. If the EUT is operated only from internal or dedicated batteries, with no provisions for connection to the public utility ac power lines (600 VAC or less) to operate the EUT (such as an adapter), then ac power-line conducted measurements are not required.

For direct current (dc) powered devices where the ac power adapter is not supplied with the device, an “off-the-shelf” unmodified ac power adapter is used. If the device is supposed to be installed in a host (e.g., the device is a module or PC card), then it is tested in a typical compliant host.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
150 kHz ≤ f < 30 MHz	9 kHz	≤ 4.5 kHz	Peak, Average	Quasi-peak, Average	Quasi-peak, Average

Table 4: Bandwidth and detector type for AC power-line conducted emissions test

The AC power-line conducted emissions test is performed in the following steps:

- The EUT is arranged as tabletop or floor-standing equipment, as applicable, and connected to a line impedance stabilization network (LISN) with 50 μH / 50 Ω. If required, a second LISN of the same type and terminated by 50 Ω is used for peripheral devices. The EUT is switched on.
- The measurement equipment is connected to the LISN for the EUT and set-up according to the specifications of the test (see table 4). At the LISN, the neutral line is selected to be tested.

- c) The prescan is performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescan, but not for final scan.
- d) When the prescan is completed, maximum levels with less margin than 10 dB or exceeding the limit are determined and collected in a list.
- e) With the first frequency of the list selected, a frequency zoom over a range of ten times of the measurement receiver bandwidth around this frequency is performed. If the EUT has no significant drift in frequency, the frequency zoom can be skipped.
- f) For final scan, the emission level is measured and the maximum is recorded.
- g) Steps e) to f) are repeated for all other frequencies in the list. At least the six highest EUT emissions relative to the limit have to be recorded.
- h) Steps c) to g) are repeated for all current-carrying conductors of all of the power cords of EUT, i.e. all phase and (if used) neutral line(s).

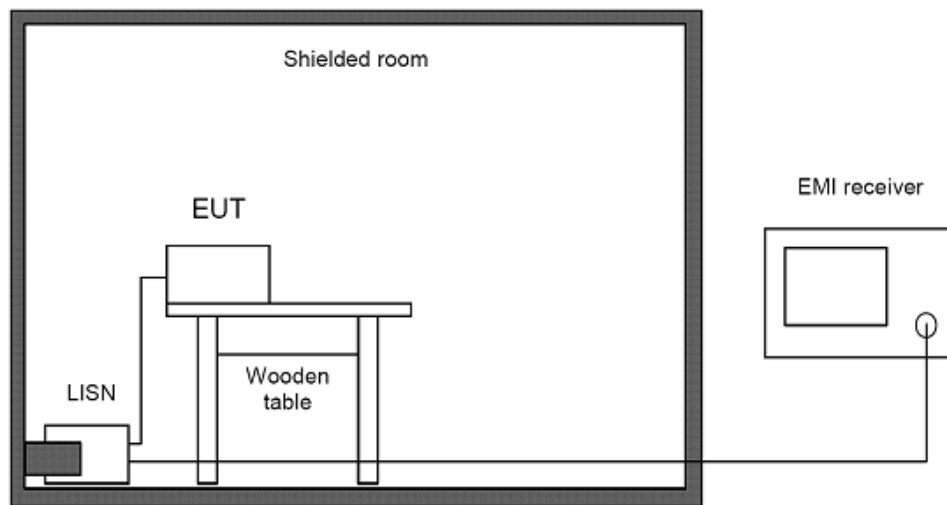


Figure 2: Setup for AC power-line conducted emissions test from 150 kHz to 30 MHz

Phase	Frequency (MHz)	Reading value (dB $\mu$ V)	AMN correction (dB)	Cable attenuation + 10 dB attenuator (dB)	Correction factor (Corr.) (dB)	Level (dB $\mu$ V)
L 1	10	10	0.6	10.9	11.5	21.5
N	10	10	1.0	10.9	11.9	21.9

Table 5: Sample calculation

Correction factor = Artificial mains network correction + Cable attenuation + 10 dB

Level = Reading value + Correction factor = 10 dB $\mu$ V + 11.5 dB = 21.5 dB $\mu$ V

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

## 6.4 Radiated emissions below 30 MHz

Radiated emissions below 30 MHz are measured according to clause 6.4 of ANSI C63.10 using an inductive shielded loop antenna. As this antenna measures the magnetic field only, its antenna factors are converted to electric field strength values assuming a free space impedance of  $377 \Omega$  as described in clause 4.3.1 of ANSI C63.10. This results in an additional correction of 51.53 dB.

According to clause 6.4.3 of ANSI C63.10, at frequencies below 30 MHz, measurements may be performed at a distance closer than that specified in the requirements. In this case, the results are extrapolated to the specified distance by using a recalculation factor determined according to one of the methods described in clause 6.4.4 of ANSI C63.10, provided that the maximum dimension of the device is equal to or less than 0.625 times the wavelength at the frequency being measured. As the minimum wavelength is 10 meters corresponding to the maximum frequency of 30 MHz, this requirement is fulfilled if the maximum dimension of the device is equal to or less than 6.25 meters.

Unless otherwise stated, the recalculation factor is determined according to clause 6.4.4.2 “Extrapolation from the measurement of a single point” of ANSI C63.10:

$$\begin{aligned} d_{\text{near field}} &= 47.77 / f_{\text{MHz}}, \text{ or} \\ f_{\text{MHz}} &= 47.77 / d_{\text{near field}} \end{aligned}$$

The frequency  $f_{\text{MHz}}$  at which the near field distance is equal to the limit and/or test distance is important for selection of the right formula to determine the recalculation factor:

$$\begin{aligned} f_{\text{MHz}}(300 \text{ m}) &\approx 0.159 \text{ MHz} \\ f_{\text{MHz}}(30 \text{ m}) &\approx 1.592 \text{ MHz} \\ f_{\text{MHz}}(3 \text{ m}) &\approx 15.923 \text{ MHz} \end{aligned}$$

Based on the test distances for the general radiated emission limits as specified in §15.209 of 47 CFR Part 15 or RSS-Gen, the following formulas are used to determine the recalculation factor:

Frequency (f)	$d_{\text{limit}}$	$d_{\text{measure}}$	Formula for recalculation factor
9 kHz $\leq$ f $\leq$ 159 kHz 490 kHz $<$ f $\leq$ 1.592 MHz	300 m 30 m	3 m	$-40 \log(d_{\text{limit}} / d_{\text{measure}})$
159 kHz $<$ f $\leq$ 490 kHz 1.592 MHz $<$ f $\leq$ 15.923 MHz	300 m 30 m	3 m	$-40 \log(d_{\text{near field}} / d_{\text{measure}}) - 20 \log(d_{\text{limit}} / d_{\text{near field}})$
f $>$ 15.923 MHz	30 m	3 m	$-20 \log(d_{\text{limit}} / d_{\text{measure}})$

Table 6: Recalculation factors for extrapolation

The radiated measurements below 30 MHz are performed in a fully anechoic room (called “CDC”). The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 7.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type
9 kHz $\leq$ f $<$ 150 kHz	200 Hz	$\leq$ 100 Hz	Peak Quasi-peak Aerage
150 kHz $\leq$ f $<$ 30 MHz	9 kHz	$\leq$ 4.5 kHz	Peak Quasi-peak Aerage

Table 7: Bandwidth and detector type for radiated emissions test below 30 MHz



<i>Frequency</i> (MHz)	<i>Reading value</i> (dB $\mu$ V)	<i>Antenna correction</i> (dB/m)	<i>Cable attenuation</i> (dB)	<i>Correction factor (Corr.)</i> (dB)	<i>Level</i> (dB $\mu$ V/m)
10	20.00	19.59	0.33	19.92	39.92

Table 8: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 20 dB $\mu$ V + 19.92 dB = 39.92 dB $\mu$ V/m

Prescans are performed with all detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans. If no limit is specified for certain detectors, final scan measurement with these detectors may be omitted.

The radiated emissions test below 30 MHz is performed in the following steps:

#### 6.4.1 Automatic test method

- The loop antenna is positioned with its plane perpendicular to the ground with the lowest height of the antenna 1 m above the ground.
- The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- The measurement equipment is connected to the loop antenna and set-up according to the specifications of the test (see table 7).
- The EUT is turned to a position likely to get the maximum and the test antenna is rotated to detect the maximum of the fundamental in this EUT position.
- Then the EUT is rotated in a horizontal plane through 360° in steps of 20°. Starting at 0°, at each table position the spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the current table position is noted as the maximum position.
- After the last prescan, the significant maximum emissions and their table positions are determined and collected in a list.
- With the test receiver set to the first frequency of the list, the EUT is rotated by  $\pm 180^\circ$  around the table position found during prescans while measuring the emission level continuously. For final scan, the worst-case table position is set and the maximum emission level is recorded.
- Step g) is repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to h) are repeated in two other orthogonal positions.

## 6.4.2 Manual test method

- a) The loop antenna is positioned with its plane perpendicular to the ground with the lowest height of the antenna 1 m above the ground.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the loop antenna and set-up according to the specifications of the test (see table 7).
- d) The EUT is turned to a position likely to get the maximum and the test antenna is rotated to detect the maximum of the fundamental in this EUT position.
- e) Then the EUT is rotated in a horizontal plane through 360° continuously. The scan table method in receiver mode of the measurement instrument is used for pre-measurements. The max hold function is used.
- f) After the last prescan, the significant maximum emissions are determined and collected in a list.
- g) Final scan: the test receiver is set in the bargraph max hold function and is set to the first frequency of the list, the EUT is rotated by 360° while measuring the emission level continuously. The worst-case table position and the maximum emission level is recorded.
- h) Step g) is repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to h) are repeated in two other orthogonal positions.

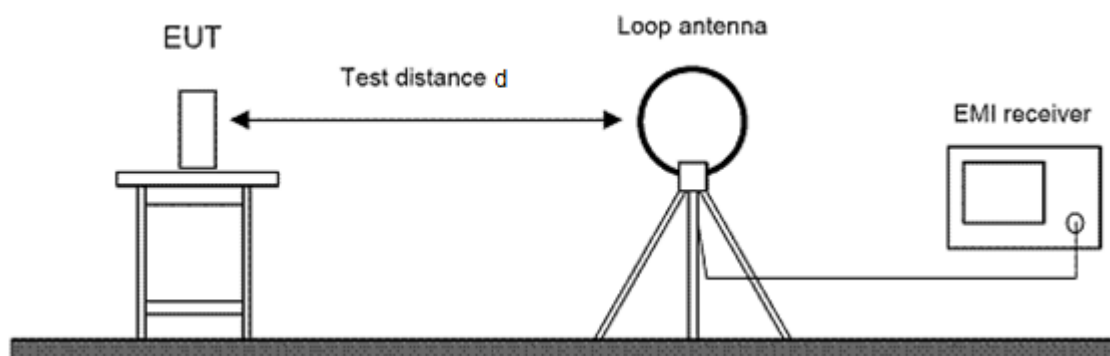


Figure 3: Setup for radiated emissions test below 30 MHz

## 6.5 Radiated emissions from 30 MHz to 1 GHz

Radiated emissions in the frequency range 30 MHz to 1 GHz are measured according to clause 6.5 of ANSI C63.10 using a semi-anechoic chamber (SAC) with a ground plane on the floor. The measurement distance is 3 meters. The emissions of the EUT are recorded with an EMI test receiver configured as described in table 9.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type		
			Prescan	Prescan with FFT	Final scan
$30 \text{ MHz} \leq f \leq 1 \text{ GHz}$	120 kHz	$\leq 60 \text{ kHz}$	Peak	Quasi-peak	Quasi-peak

Table 9: Bandwidth and detector type for radiated emissions test from 30 MHz to 1 GHz

Frequency (MHz)	Reading value (dB $\mu$ V)	Antenna correction (dB/m)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dB $\mu$ V/m)
100	30.00	11.71	1.06	12.77	42.77

Table 10: Sample calculation

Correction factor = Antenna correction + Cable attenuation

Level = Reading value + Correction factor = 30 dB $\mu$ V + 12.77 dB = 42.77 dB $\mu$ V/m

The measurement antenna is a combination of a biconical antenna and a logarithmic-periodic dipole array antenna. It is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and in a height between 1 m and 4 m above the ground plane.

If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The radiated emissions test from 30 MHz to 1 GHz is performed in the following steps:

### 6.5.1 Automatic test method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 9).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
- g) The antenna height is increased to 4 m in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from 4 m to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) The EUT is rotated in a horizontal plane through 360° in steps of 20°. At each table position, steps e) to i) are repeated.
- k) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- l) With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- m) The antenna is moved at a height from 1 m to 4 m and the EUT is rotated through 360° while measuring the emission level continuously.
- n) For final scan, the worst-case positions of antenna and table are set and the maximum emission level is recorded. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.
- o) Steps l) to n) are repeated for all other frequencies in the list.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

### 6.5.2 Manual test method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 9).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The spectrum for the full frequency range is recorded. The measurement is performed with peak detector and max hold.
- g) The antenna height is increased to 4 m in steps of 50 cm. At each height, step f) is repeated or the measurement is stopped after all heights were measured.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from 4 m to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) The EUT is rotated in a horizontal plane through 360° continuously. At each table position, steps e) to i) are repeated.
- k) After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna are determined and collected in a list.
- l) Final scan: the test receiver is set in the bargraph max hold function and is set to the first frequency of the list, the EUT is rotated by 360° and the antenna is moved from 1 m to 4 m while measuring the emission level continuously. The worst-case table position and the maximum emission level is recorded.
- m) Step l) is repeated for all other frequencies in the list. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

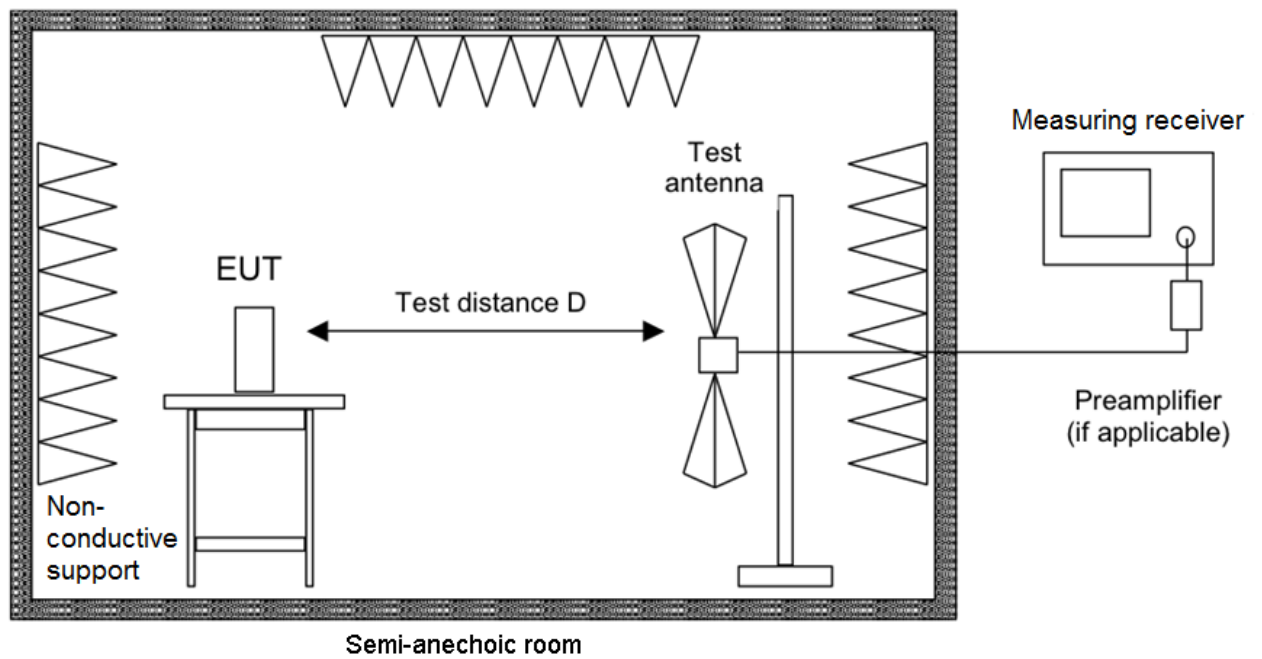


Figure 4: Setup for radiated emissions test from 30 MHz to 1 GHz

## 6.6 Radiated emissions above 1 GHz

Radiated emissions above 1 GHz are measured according to clause 6.6 of ANSI C63.10 by conducting exploratory and final radiated emission tests. According to clause 6.6.4.1 of ANSI C63.10, measurements may be performed at a distance closer than that specified in the requirements. However, an attempt shall be made to avoid making final measurements in the near field of both the measurement antenna and the EUT.

For measurement of radiated emissions above 1 GHz, horn antennas are used.

Test chamber	Frequency (MHz)	Reading value (dBμV)	Antenna correction (dB/m)	Correction pre-amplifier (dB)	Cable attenuation (dB)	Correction factor (Corr.) (dB)	Level (dBμV/m)
SAC3	2400	50.00	27.76	-47.91	5.24	-14.92	35.08
FS-SAC	2400	50.00	27.76	-34.57	3.51	-3.30	46.70

Table 11: Sample calculation

Correction factor = Antenna correction + Correction pre-amplifier + Cable attenuation

SAC3:

Level = Reading value + Correction factor = 50.00 dBμV - 14.92 dB/m = 35.08 dBμV/m

FS-SAC:

Level = Reading value + Correction factor = 50.00 dBμV - 3.30 dB/m = 46.70 dBμV/m

### 6.6.1 Exploratory radiated emissions measurements

Exploratory radiated emissions above 1 GHz are measured in a semi-anechoic chamber with RF absorbing material on the floor or a fully anechoic room. They are performed by moving the receiving antenna over all sides of the EUT at a closer distance (e.g. 0.5 or 1 m) while observing the display of the test receiver to find the emissions to be re-tested during final radiated emission measurements.

According to clause 5.3.3 of ANSI C63.10, when performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade of distance (inverse of linear distance for field-strength measurements). To simplify testing and documentation, the limits are increased accordingly instead of decreasing the results.

The emissions of the EUT are displayed and recorded with an EMI test receiver operating in the spectrum analyzer mode using the settings as described in table 12.

Frequency (f)	Resolution bandwidth	Video bandwidth	Sweep time	Trace detector(s)
$f \geq 1 \text{ GHz}$	1 MHz	3 MHz	AUTO	Max Peak, Average

Table 12: Bandwidth and trace settings for exploratory radiated emissions test above 1 GHz

If during exploratory radiated emissions measurements no levels to be re-tested are found, the final radiated emissions measurement may be omitted. In this case, the chart of the exploratory radiated emissions measurements has to be reported.

## 6.6.2 Final radiated emissions measurements

Final radiated emissions above 1 GHz are measured in the semi-anechoic chamber (SAC3) or Free space semi-anechoic chamber (FS-SAC) with RF absorbing material on the floor between measurement antenna and EUT. The measurement distance is 3 meters in the semi-anechoic chamber (SAC3) or 1.5 m in the Free space semi-anechoic chamber (FS-SAC). The emissions of the EUT are recorded with an EMI test receiver configured as described in table 13.

Frequency (f)	Measurement receiver bandwidth	Step size	Detector type	
			Prescan	Final scan
$f \geq 1 \text{ GHz}$	1 MHz	$\leq 500 \text{ kHz}$	Peak, Average	Peak, Average

Table 13: Bandwidth and detector type for final radiated emissions test above 1 GHz

Prescans are performed with both detectors activated at the same time. If the test receiver is capable of FFT analysis, it is used for prescans, but not for final scans.

The horn antenna is mounted on a support capable of allowing the antenna to be used in either horizontal or vertical polarization and to be moved in a scan height range between 1 m and the scan height upper range defined in clause 6.6.3.3 of ANSI C63.10. When the EUT is manipulated through three different orientations, the scan height upper range for the measurement antenna is limited to 2.5 m above the ground plane.or 0.5 m above the top of the EUT, whichever is higher. Otherwise, the scan height upper range is 4 m above the ground plane.

To keep the emission signal within the illumination area of the 3 dB beamwidth of the measurement antenna, the automatic tilt function of the antenna support device is used to point the antenna at an angle toward the source of the emission.

The final radiated emissions test above 1 GHz is performed in the following steps:

### 6.6.2.1 Automatic measurement method

- The measurement antenna is oriented initially for vertical polarization.
- The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 13).
- The table position is set to 0°.
- The antenna height is set to 1 m.
- The spectrum for the full frequency range is recorded. If the emission at a certain frequency is higher than the levels already recorded, the polarization and height of the measurement antenna as well as the current table position are noted as the maximum position.
- The antenna height is increased to the scan height upper range in steps of 50 cm. At each height, step f) is repeated.
- The polarization of the measurement antenna is changed to horizontal.
- The antenna height is decreased from the scan height upper range to 1 m in steps of 50 cm. At each height, step f) is repeated.
- The EUT is rotated in a horizontal plane through 360° in steps of 20°. At each table position, steps e) to i) are repeated.
- After the last prescan, the significant maximum emissions with their polarizations and heights of the measurement antenna as well as their table positions are determined and collected in a list.
- With the test receiver set to the first frequency of the list, the measurement antenna is set to the polarization and height and the table is moved to the position as determined during prescans.
- The antenna is moved from 1 m to 4 m around this height and the EUT is rotated through 360° around while measuring the emission level continuously.
- The worst-case positions of antenna and table and the maximum emission level are recorded.

- o) Steps l) to n) are repeated for all other frequencies in the list. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

### 6.6.2.2 Manual measurement method

- a) The measurement antenna is oriented initially for vertical polarization.
- b) The EUT is placed in its standard position on a turntable capable of rotation through 360° in the horizontal plane and arranged as tabletop or floor-standing equipment, as applicable. The EUT is switched on.
- c) The measurement equipment is connected to the measurement antenna and set-up according to the specifications of the test (see table 13).
- d) The table position is set to 0°.
- e) The antenna height is set to 1 m.
- f) The EUT is rotated in a horizontal plane through 360° The spectrum for the full frequency range is recorded using the peak detector.
- g) The antenna height is increased to the scan height upper range in steps of 50 cm. At each height, step f) is repeated.
- h) The polarization of the measurement antenna is changed to horizontal.
- i) The antenna height is decreased from the scan height upper range to 1 m in steps of 50 cm. At each height, step f) is repeated.
- j) After the last prescan, the significant maximum emissions with their polarizations are determined and collected in a list.
- k) For the final scan the test receiver is set to the first frequency of the list. By using the bargraph max hold function of the measurement receiver the emission in consideration is maximised by rotating the EUT in the horizontal plane through 360° and moving the antenna from 1 m to 4 m (2.5 m).
- l) The worst-case positions of antenna and table and the maximum emission level are recorded.
- m) Steps l) to n) are repeated for all other frequencies in the list. At least, frequency and level of the six highest emissions relative to the limit have to be recorded. However, emissions more than 20 dB below the limit do not need to be reported.

If the EUT may be used in various positions, steps a) to o) are repeated in two other orthogonal positions.

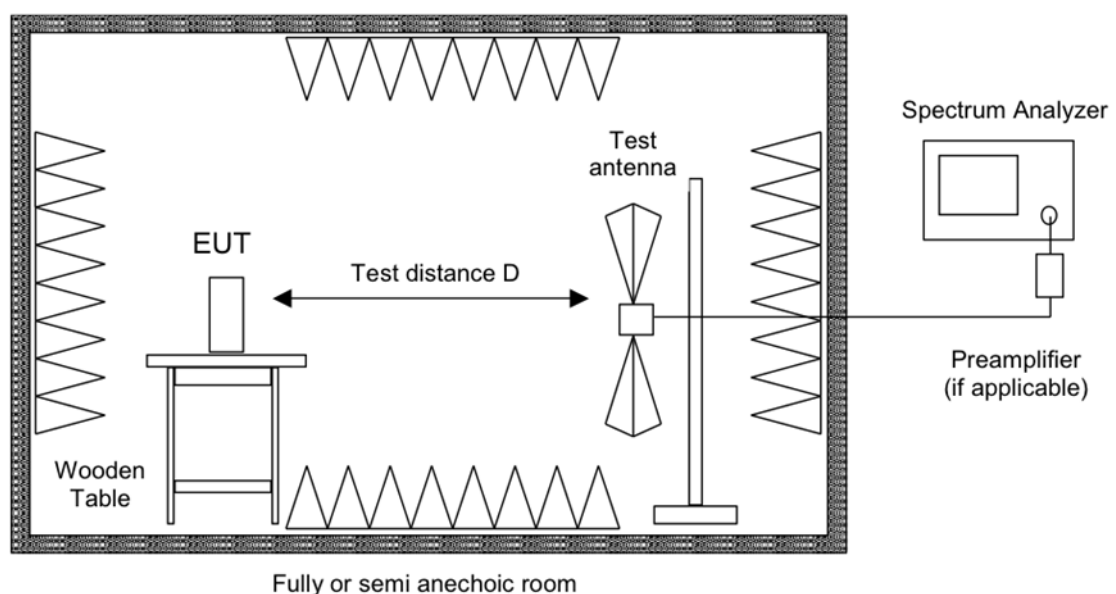


Figure 5: Setup for radiated emissions test above 1 GHz



## 6.7 Bandwidth measurements

In case of antenna-port conducted tests as described in clause 6.2 cannot be performed, according to section 3.0 of KDB 558074 D01, results of radiated tests are used for demonstrating compliance to the conducted emission requirements. For details about conversion see clause 6.1.2

### 6.7.1 6 dB bandwidth (DTS bandwidth)

The 6 dB bandwidth or DTS bandwidth is measured according to clause 8.0 of KDB Publication 558074, document D01, using the following settings:

- a) Resolution bandwidth RBW = 100 kHz
- b) Video bandwidth (VBW)  $\geq 3 \times$  RBW
- c) Detector = Peak
- d) Trace mode = max hold
- e) Sweep = auto couple

After the trace is stabilized, the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

If using the automatic bandwidth measurement capability of the test instrument (6 dB down function), care shall be taken so that the bandwidth measurement is not influenced by any intermediate power nulls in the fundamental emission that might be  $\geq 6$  dB. In addition, it has to be checked that this function delivers the two outermost amplitude points.

### 6.7.2 99 % occupied bandwidth

According to section 6.7 of RSS-Gen, the occupied bandwidth (OBW) is defined as the 99 % emission bandwidth.

The span of the spectrum analyzer is set large enough to capture all products of the modulation process, including the emission skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.

The resolution bandwidth is in the range of 1 % to 5 % of the occupied bandwidth and the video bandwidth is not smaller than three times the resolution bandwidth. Video averaging is not permitted.

If possible, the detector of the spectrum analyzer is set to "Sample". However, if the device is not transmitting continuously, a peak, or peak hold is used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement).

To measure the 99 % emission bandwidth, the OBW function of the test receiver is used with the power bandwidth set to 99 %. This function indicates the lowest frequency (starting from the left side of the span) and the highest frequency (starting from the right side of the span) where 0.5% of the total sum is reached. The difference between the two frequencies is the 99 % occupied bandwidth.

### 6.7.3 20 dB bandwidth of the emission

The 20 dB bandwidth of the emission is measured according to clause 6.9.2 of ANSI C63.10 as the width of the spectral envelope of the modulated signal, at an amplitude level reduced by a ratio of 20 dB down from the reference value.

The spectrum analyzer center frequency is set to the nominal EUT channel center frequency. The span range for the EMI receiver or spectrum analyzer is between two times and five times the 20 dB bandwidth. The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1 % to 5 % of the 20 dB bandwidth and the video bandwidth (VBW) shall be approximately three times RBW.

The reference level of the instrument is set as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than  $[10 \log(20 \text{ dB bandwidth/RBW})]$  below the reference level.

## 6.8 Maximum peak conducted output power

In case of antenna-port conducted tests as described in clause 6.2 cannot be performed, according to section 3.0 of KDB 558074 D01, results of radiated tests are used for demonstrating compliance to the conducted emission requirements. For details about conversion see clause 6.1.2

The maximum conducted output power test method for digital transmission systems (DTS) refers to section 8.3.1.1 of KDB Publication 558074, document D01.

The spectrum analyzer settings are as follows:

- a) Span  $\geq 3 \times \text{RBW}$ , centered on a channel
- b) RBW  $\geq \text{DTS bandwidth}$
- c) VBW  $\geq 3 \times \text{RBW}$
- d) Sweep time = auto coupled
- e) Detector function = peak
- f) Trace mode = max hold
- g) Reference level = more than  $10 \cdot \log(\text{OBW/RBW})$  dB above peak of spectral envelope

After the trace is stabilized, the marker-to-peak function is used to set the marker to the peak of the emission. The indicated level is the maximum peak conducted output power.

## 6.9 Power spectral density

The power spectral density test method for DTS systems refers to section 8.4 of KDB Publication 558074, document D01.

The spectrum analyzer settings are as follows:

- a) Span = 1.5 times the DTS bandwidth, centered on a channel
- b) RBW:  $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$
- c) VBW  $\geq 3 \times \text{RBW}$
- d) Sweep time = auto coupled or  $\geq \text{span}/\text{RBW}$  in seconds, whichever is greater
- e) Detector function = peak
- f) Trace mode = max hold
- g) Reference level = more than  $10 \cdot \log(\text{OBW}/\text{RBW})$  dB above peak of spectral envelope

After the trace is stabilized, the marker-to-peak function is used to set the marker to the peak of the emission. The indicated level is the power spectral density.

In case of antenna-port conducted tests as described in clause 6.2 cannot be performed, according to section 3.0 of KDB 558074 D01, results of radiated tests are used for demonstrating compliance to the conducted emission requirements. For details about conversion see clause 6.1.2

## 6.10 Operation within the band 13.110 MHz – 14.010 MHz

The EUT was placed in a fully anechoic chamber and the testing was performed in accordance with ANSI C63.10 and 47 CFR Part 15, section 15.225 (a) to (c). The measurement distance was 3 m. To find the closest margin of the spectrum to the limit mask adapted to the test distance the EUT was rotated by 360 degrees with detector of the test receiver set to peak. The loop antenna placed in a fixed height of 1 meter was rotated by 360 degrees to get the maximum of emission. In case of exceeding the limits the detector is switched to quasi peak for final testing in position of maximum emission.

## 7 Test results

This clause gives details about the test results as collected in the summary of test results on page 5.

For information about measurement uncertainties see page 48.

The climatic conditions are recorded during the tests. It is ensured that the climatic conditions are within the following ranges:

<i>Ambient temperature</i>	<i>Ambient humidity</i>	<i>Ambient pressure</i>
15°C to 35°C	30 % to 75 %	86 kPa to 106 kPa

Note(s):

1. All tests were performed at 120 V and 60 Hz.

## 7.1 Calculated conducted output power

Section(s) in 47 CFR Part 15:	Requirement(s):	15.247(b)
	Reference(s):	KDB 558074 D01, clause 8.3 ANSI C63.10, clause 11.9
Section(s) in RSS:	Requirement(s):	RSS-247, section 5.4(d)
	Reference(s):	KDB 558074 D01, clause 8.3 ANSI C63.10, clause 11.9

Performed by:	Konrad Graßl	Date(s) of test:	August 16, 2023
Result:	<input checked="" type="checkbox"/> Test passed <input type="checkbox"/> Test not passed		

### 7.1.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Free space semi-anechoic chamber (FS-SAC)	FS-SAC	ELEMENT STRAUBING	E00100
EMI test receiver	ESW 44	Rohde & Schwarz	E00895
Preamplifier (0.5 GHz - 18 GHz)	BBV 9718 B	Schwarzbeck	W01325
Horn antenna	BBHA 9120D	Schwarzbeck	W00053
Attenuator (20 dB)	---	Rohde & Schwarz	W00682
Cable set FS-SAC	RF cable(s)	Teledyne Reynolds Huber + Suhner Teledyne Reynolds	E00435 E00307 E00433

### 7.1.2 Limits

According to §15.247(b)(3):

For systems using digital modulation in the 2400-2483.5 MHz band: 1 Watt (30 dBm).

As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

According to §15.247(b)(4):

The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to RSS-247, section 5.4(d):

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

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

### 7.1.3 Test procedure

The maximum peak conducted output power is measured using the test procedure as described in clause 6.7.3 and referring to the

- ☐ test method for conducted measurements as described in clause 6.2.
- ☒ test method for radiated measurements as described in clause 6.6.

## 7.1.4 Test results

Test distance:	<input checked="" type="checkbox"/> 1.5 m	<input type="checkbox"/> 10 m	<input type="checkbox"/> ..... m
Polarization:	<input checked="" type="checkbox"/> horizontal	<input checked="" type="checkbox"/> vertical	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. The gain of the antenna is below 6 dBi, therefore a reduction of the conducted limit was not applied.
2. Pre-measurements were performed to declare the worst case which is documented below.
3. EIRP is calculated as defined in clause 9.5 of ANSI C63.10-2013.
4. Conducted output power is calculated by subtracting the gain of the EIRP.

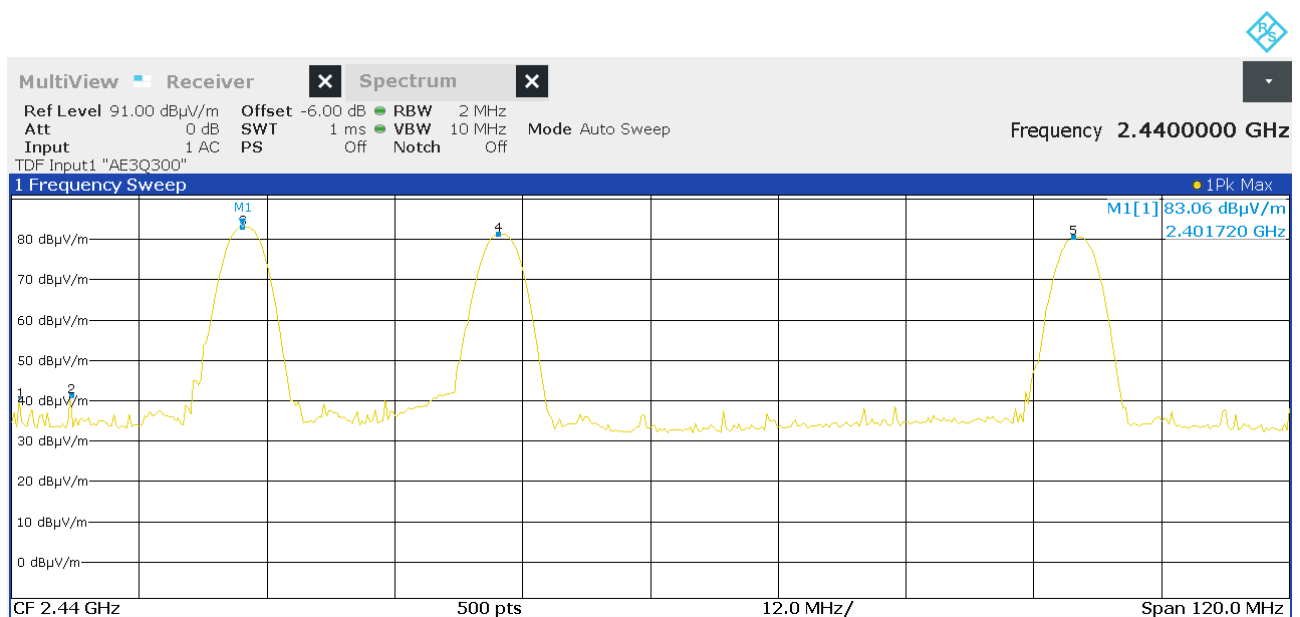


Figure 6: Chart of field strength at 3 m in advertising mode, EUT position Z, antenna polarization horizontal

Channel	EUT Pos.	Field strength (dBμV/m) at 3 m	Detector	Height (cm)	Pol.	Azimuth (deg)	EIRP (dBm)
Low	Z	84.70	PK	235.0	H	96.0	-10.50
Middle	Z	82.82	PK	224.0	H	99.0	-12.38
High	Z	81.99	PK	242.0	H	103.0	-13.21

Table 14: Results of field strength at 3 m in advertising mode

Channel	EIRP (dBm)	Antenna gain (dBi)	Calculated conducted output power (dBm)	Limit (dBm)	Margin (dB)	Result
Low	-10.50	-5.58	-4.92	30.00	34.92	Passed
Middle	-12.38	-7.20	-5.18	30.00	35.18	Passed
High	-13.21	-5.59	-7.62	30.00	37.62	Passed

Table 15: Results of calculated conducted output power in advertising mode

## 7.2 Operation within the band 13.110 MHz – 14.010 MHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (a)-(c)
	Reference(s):	ANSI C63.10, section 6.4
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) I-III
	Reference(s):	ANSI C63.10, section 6.4

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	January 16, 2023
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 7.2.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Compact Diagnostic Chamber (CDC)	VK041.0174	Albatross Projects	E00026
EMI test receiver	ESR 7	Rohde & Schwarz	E01549
Loop antenna	HFH2-Z2	Rohde & Schwarz	E00060
Cable set CDC	RF cable(s)	Huber + Suhner AME HF-Technik AME HF-Technik Stabo	E00446 E00920 E00921 E01215
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073



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### 7.2.2 Limits

According to § 15.225(a)-(c):

The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15.848 microvolts/meter at 30 meters.

Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.

Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.

According to RSS-210 section B.6 I-III:

The field strength of any emissions shall not exceed the following limits:

15.848 mV/m (84 dB $\mu$ V/m) at 30 m, within the band 13.553-13.567 MHz

334  $\mu$ V/m (50.5 dB $\mu$ V/m) at 30 m, within the bands 13.410-13.553 MHz and 13.567-13.710 MHz

106  $\mu$ V/m (40.5 dB $\mu$ V/m) at 30 m, within the bands 13.110-13.410 MHz and 13.710-14.010 MHz

In case of measurements that are performed at other distances than that specified in the requirements, the limits in the charts and tables reported with the test results are derived from the general radiated emission limits as listed above using the recalculation factor as described in 6.4.

### 7.2.3 Test procedure

The emission within the band 13.110 MHz – 14.010 MHz is measured using the test procedure as described in clause 6.4.

## 7.2.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m		
Antenna alignment:	<input checked="" type="checkbox"/> in parallel	<input checked="" type="checkbox"/> in line	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

1. Pre-measurements were performed to declare the worst-case which is documented below.
2. The chart shows the calculated limit at 3 m.

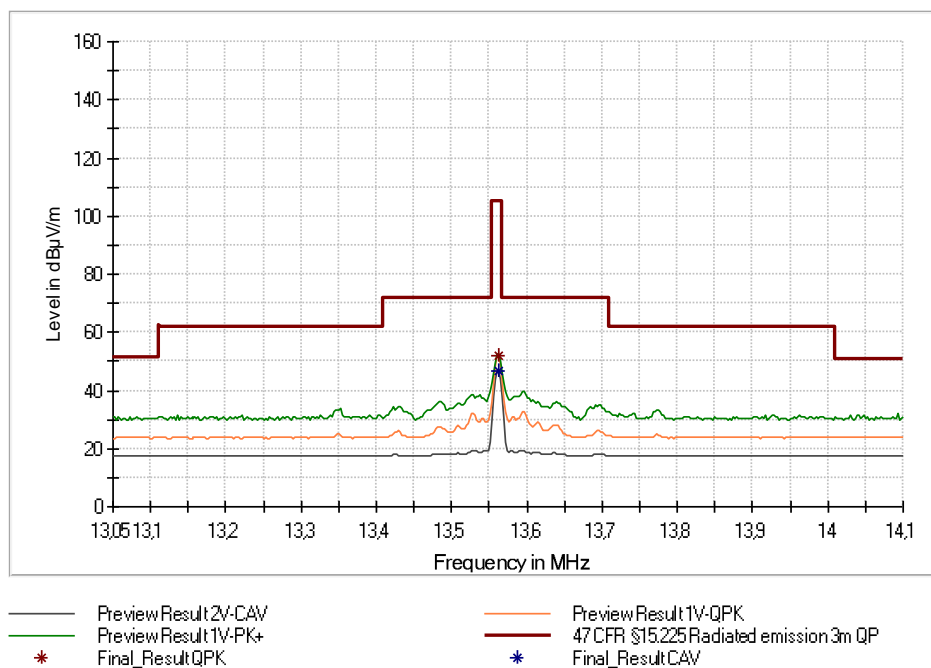


Figure 7: Chart of emission within the band 13.110 MHz to 14.010 MHz, EUT in position X, without tag, antenna in line at 3 m distance

Frequency (MHz)	Measured field strength (dBμV/m) at 3 m	Recalculation factor (dB)	Field strength (dBμV/m) at 30 m	Limit (dBμV/m) at 30 m	Margin (dB)	Detector	Result
13.56225	51.99	-21.40	30.59	84.00	53.41	QP	Passed

Table 16: Results of emission within the band 13.110 MHz to 14.010 MHz, EUT in position X, without tag, antenna in line

### 7.3 Radiated emissions below 30 MHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.225 (d) 15.247(d)
	Reference(s):	KDB 558074 D01, clauses 8.5 and 8.6 ANSI C63.10, clause 6.4
Section(s) in RSS:	Requirement(s):	RSS-210, section B.6 (a) IV RSS-247, section 5.5
	Reference(s):	KDB 558074 D01, clauses 8.5 and 8.6 ANSI C63.10, clause 6.4

Performed by:	Konrad Graßl	Date(s) of test:	July 24, 2023
Result:	<input checked="" type="checkbox"/> Test passed <input type="checkbox"/> Test not passed		

#### 7.3.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Compact Diagnostic Chamber (CDC)	VK041.0174	Albatross Projects	E00026
EMI test receiver	ESR 7	Rohde & Schwarz	E01549
Loop antenna	HFH2-Z2	Rohde & Schwarz	E00060
Cable set CDC	RF cable(s)	Huber + Suhner	E00446
		AME HF-Technik	E00920
		AME HF-Technik	E00921
		Stabo	E01215

### 7.3.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

According to §15.247(d) and RSS-247 section 5.5:

In any 100 kHz bandwidth outside of 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.

In addition, radiated emissions which fall in the restricted bands must also comply with the radiated emission limits specified in §15.209(a) and RSS-Gen section 8.10.

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{V}/\text{m}$ )	( $\text{dB}\mu\text{V}/\text{m}$ )	
0.009 – 0.490	2400/F(kHz) (266.67 – 4.90)	48.52 – 13.80	300
0.490 – 1.705	24000/F(kHz) (48.98 – 14.08)	33.80 – 22.97	30
1.705 – 30	30	29.54	30

Table 17: General radiated emission limits up to 30 MHz according to §15.209

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{A}/\text{m}$ )	( $\text{dB}\mu\text{A}/\text{m}$ )	
0.009 – 0.490	6.37/F(kHz) (0.708 – 0.013)	-2.999 – -37.721	300
0.490 – 1.705	63.7/F(kHz) (0.13 – 0.037)	-17.721 – -28.636	30
1.705 – 30	0.08	-21.94	30

Table 18: General radiated emission limits up to 30 MHz according to section 8.9 of RSS Gen

In case of measurements that are performed at other distances than that specified in the requirements, the limits in the charts and tables reported with the test results are derived from the general radiated emission limits as listed in table 17 and Table 18, using the recalculation factor as described in 6.4.

### 7.3.3 Test procedure

The radiated emissions below 30 MHz are measured using the

- ☒ manual measurement procedure as described in clause 6.4.
- ☐ automatic measurement procedure as described in clause 6.4.

### 7.3.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m	<input type="checkbox"/> 10 m	<input type="checkbox"/> ..... m
Antenna alignment:	<input checked="" type="checkbox"/> in parallel	<input checked="" type="checkbox"/> in line	<input type="checkbox"/> angle ..... °
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

- 1 Pre-measurements were performed to declare the worst case which is documented below.
- 2 The emission at 13.56 MHz is not in consideration in this test.
- 3 No assessable emissions were detected.
- 4 The limits in CFR 47, Part 15, Subpart C, paragraph 15.209(a), are identical to those in RSS-Gen section 8.9, Table 6, since the measurements are performed in terms of magnetic field strength and converted to electric field strength levels (as reported in the table) using the free space impedance of 377 Ohms. For example, the measurement at frequency X kHz resulted in a level of Y dBuV/m, which is equivalent to  $Y - 51.5 = Z$  dBuA/m, which has the same margin, W dB, to the corresponding RSS-210 limit as it has to 15.209(a) limit.

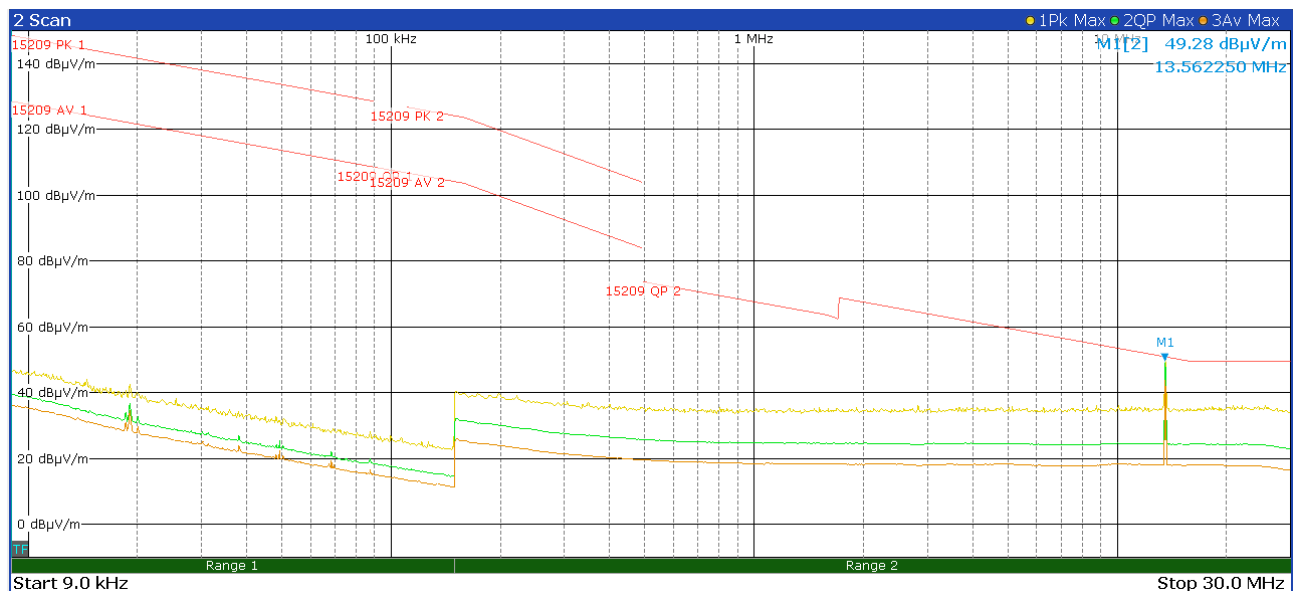


Figure 8: Chart of emissions test below 30 MHz, EUT position X, antenna in line to the EUT, without tag

## 7.4 Radiated emissions from 30 MHz to 1 GHz

Section(s) in 47 CFR Part 15:	Requirement(s):	15.209(a) 15.225 (d) 15.247(d)
	Reference(s):	KDB 558074 D01, clauses 8.4 and 8.5 ANSI C63.10, clause 6.5
Section(s) in RSS:	Requirement(s):	RSS-210, section 7.3 RSS-210, section B.6 (a) IV RSS-247, section 5.5
	Reference(s):	KDB 558074 D01, clauses 8.4 and 8.5 ANSI C63.10, clause 6.5

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	September 14, 2022
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 7.4.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Semi-anechoic chamber (SAC)	SAC3	Albatross Projects	E00716
EMI test receiver	ESR 7	Rohde & Schwarz	E01549
TRILOG broadband antenna (SAC)	VULB 9162	Schwarzbeck	E00643
Cable set SAC	RF cable(s)	Huber + Suhner	E00755 E01033 E01034
Test software	EMC32-(M)EB, V10.60.20	Rohde & Schwarz	E00777, E00778 or E01073

## 7.4.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

According to §15.247(d) and RSS-247 section 5.5:

In any 100 kHz bandwidth outside of 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.

In addition, radiated emissions which fall in the restricted bands must also comply with the radiated emission limits specified in §15.209(a) and RSS-Gen section 8.10.

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{V/m}$ )	( $\text{dB}\mu\text{V/m}$ )	
30 – 88	100	40.00	3
88 – 216	150	43.52	3
216 - 960	200	46.02	3
Above 960	500	53.98	3

Table 19: General radiated emission limits  $\geq 30$  MHz according to §15.209 and RSS-Gen section 8.9

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

## 7.4.3 Test procedure

The radiated emissions from 30 MHz to 1 GHz are measured using the

- ☐ manual measurement procedure as described in clause 6.5.
- ☒ automatic measurement procedure as described in clause 6.5.

## 7.4.4 Test results

Test distance:	<input checked="" type="checkbox"/> 3 m	<input type="checkbox"/> 10 m	<input type="checkbox"/> ..... m
Polarization:	<input checked="" type="checkbox"/> horizontal	<input checked="" type="checkbox"/> vertical	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s)

1 Pre-measurements were performed to declare the worst case which is documented below.

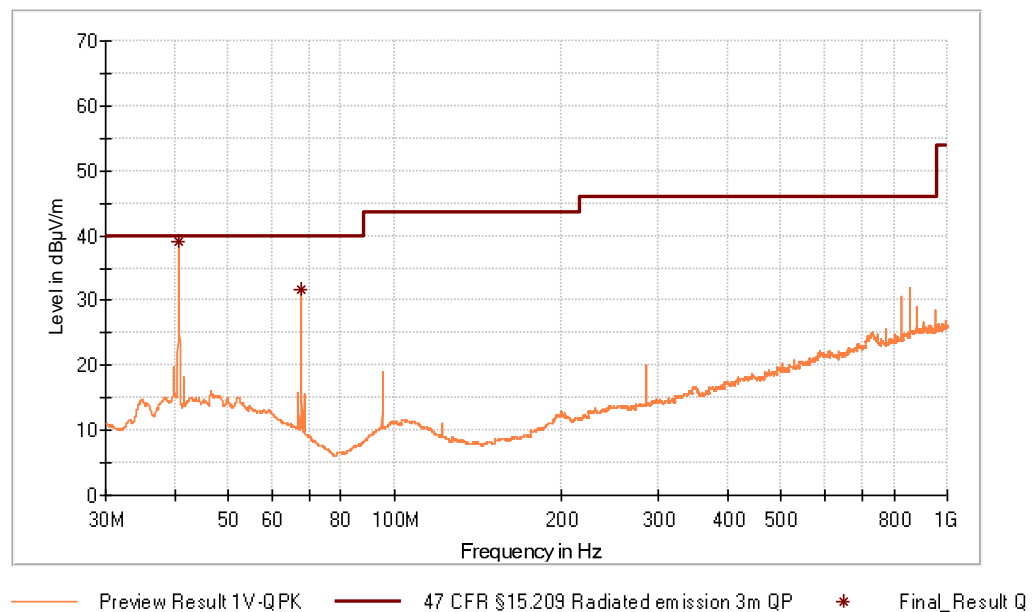


Figure 9: Chart of emissions test from 30 MHz to 1 GHz, EUT position X, antenna polarization vertical, with tag

Frequency (MHz)	Field strength (dBµV/m at 3 m)	Limit (dBµV/m at 3 m)	Margin (dB)	Height (cm)	Pol.	Azimuth (deg)	Corr. (dB/m)	Result
40.680000	39.06	40.00	0.94	100.0	V	84.0	13.7	Passed
67.800000	31.69	40.00	8.31	100.0	V	257.0	11.4	Passed

Table 20: Results of emissions test from 30 MHz to 1 GHz, with tag



## 7.5 Radiated emissions from 1 GHz to 25 GHz (10<sup>th</sup> harmonic)

Section(s) in 47 CFR Part 15:	Requirement(s):	15.209(a) 15.225 (d) 15.247(d)
	Reference(s):	KDB 558074 D01, clauses 8.4 and 8.5 ANSI C63.10, clause 6.6
Section(s) in RSS:	Requirement(s):	RSS-210, section 7.3 RSS-210, section B.6 (a) IV RSS-247, section 5.5
	Reference(s):	KDB 558074 D01, clauses 8.4 and 8.5 ANSI C63.10, clause 6.6

Performed by:	Jennifer Riedel B. Eng.	Date(s) of test:	January 23, 2023
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Result:	<input checked="" type="checkbox"/> Test passed	<input type="checkbox"/> Test not passed
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### 7.5.1 Test equipment

Type	Designation	Manufacturer	Inventory no.
Free space semi-anechoic chamber (FS-SAC)	FS-SAC	ELEMENT STRAUBING	E00100
EMI test receiver	ESU 26	Rohde & Schwarz	W00002
Preamplifier (0.5 GHz - 18 GHz)	BBV 9718 B	Schwarzbeck	W01325
Preamplifier (18 GHz – 40 GHz)	BBV 9721	Schwarzbeck	W01350
Horn antenna	BBHA 9120D	Schwarzbeck	W00053
Horn antenna	BBHA 9170	Schwarzbeck	W00055
Cable set FS-SAC	RF cable(s)	Teledyne Reynolds Huber + Suhner Teledyne Reynolds	E00435 E00307 E00433

### 7.5.2 Limits

According to §15.225(d):

The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

According to §15.247(d) and RSS-247 section 5.5:

In any 100 kHz bandwidth outside of 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.

In addition, radiated emissions which fall in the restricted must also comply with the radiated emission limits specified in §15.209(a) and RSS-Gen section 8.10.

According to § 15.209(a):

Except as provided elsewhere in subpart 15.209 the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field strength		Measurement distance (m)
	( $\mu\text{V/m}$ )	(dB $\mu\text{V/m}$ )	
Above 960	500	54	3

Table 21: General radiated emission limits above 960 MHz according to §15.209 and RSS-Gen

According to section 7.3 of RSS-210:

Transmitters whose wanted and unwanted emissions fall within the general field strength limits specified in RSS-Gen may operate licence-exempt in any of the frequency bands, other than the restricted frequency bands listed in RSS-Gen and the TV bands 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-602 MHz, and shall be certified under RSS-210. Under no circumstances shall the level of any unwanted emissions exceed the level of the fundamental emissions.

According to RSS-210, section B.6 (a) IV:

RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

### 7.5.3 Test procedure

The radiated emissions above 1 GHz are measured using the

- ☒ manual measurement procedure as described in clause 6.6.
- ☐ automatic measurement procedure as described in clause 6.6.

## 7.5.4 Test results

Test distance:	Exploratory tests:	<input type="checkbox"/> 1 m	<input checked="" type="checkbox"/> 0.5 m
	Final tests:	<input type="checkbox"/> 3 m	<input checked="" type="checkbox"/> 1.5 m
Antenna alignment:	<input checked="" type="checkbox"/> horizontal	<input checked="" type="checkbox"/> vertical	
EUT position:	<input checked="" type="checkbox"/> Position X	<input checked="" type="checkbox"/> Position Y	<input checked="" type="checkbox"/> Position Z

Note(s):

- 1 The measurements from 1 GHz to 17 GHz are made at a measurement distance of 1.5 m. However, the limit lines for these tests are referenced to the limit lines at a measurement distance of 3 m (Offset – 6 dB).
- 2 The exploratory measurements from 17 GHz to 25 GHz are made at a measurement distance of 0.5 m. However, the limit lines for these tests are referenced to the limit lines at a measurement distance of 3 m (Offset – 15.6 dB).
- 3 Pre-measurements were performed to declare the worst case which is documented below. The table results show the final measurements of the emissions detected in the pre-measurements which are shown in this test report.
- 4 According to clause 6.6.4.3, note 1 of ANSI C63.10, if the maximized peak measured value complies with the average limit, then it is unnecessary to perform an average measurement.

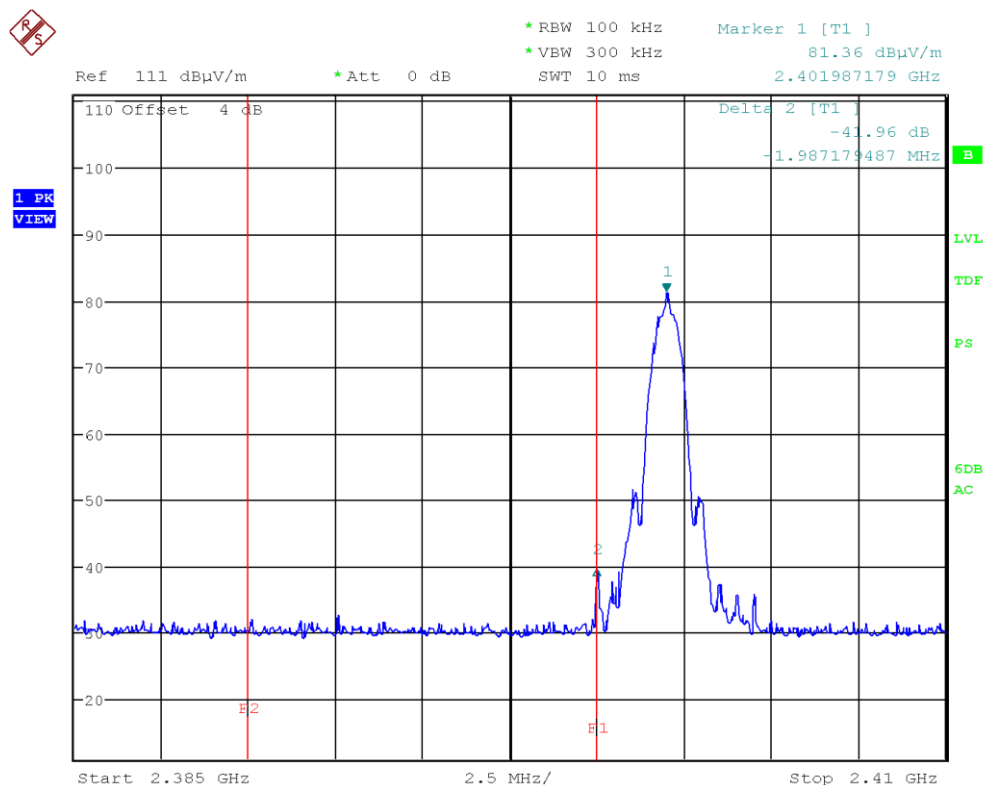


Figure 10: Chart of band-edge measurement in advertising mode, EUT position Z, antenna polarization horizontal, without tag, with peak-detector

Frequency (MHz)	Measured margin (dB)	Limit of minimum margin	Result
2400.000	41.96	≥ 20	Passed

Table 22: Test results of band-edge measurements in advertising mode, EUT position Z, antenna polarization horizontal, without tag

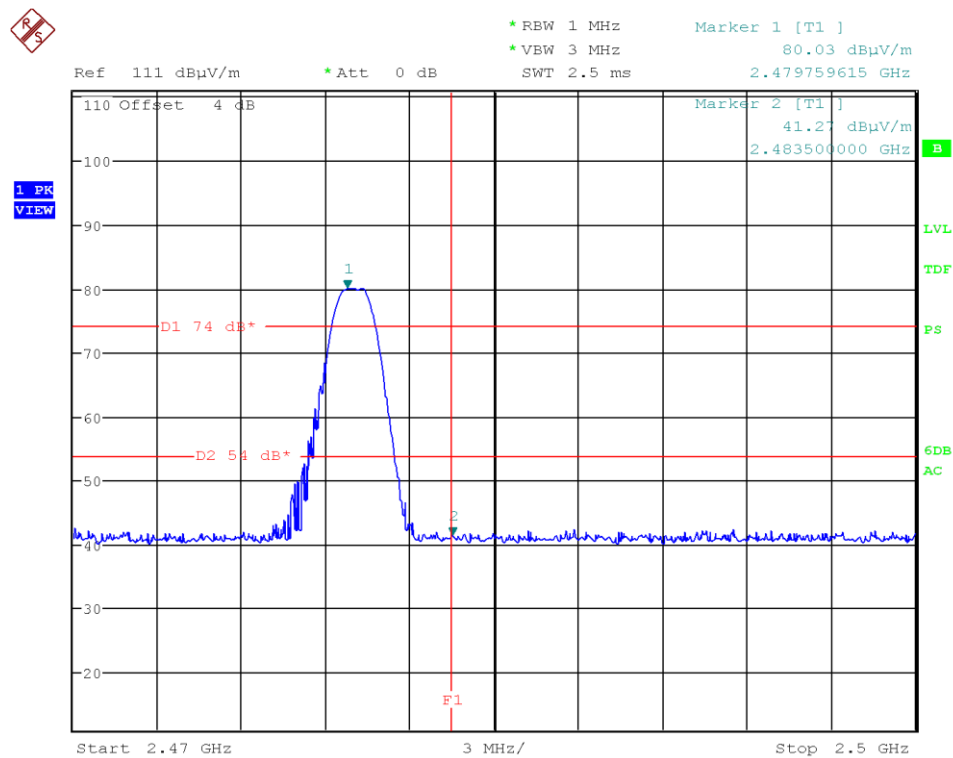


Figure 11: Chart of band-edge measurement in advertising mode, EUT position Z, antenna polarization horizontal, without tag, with peak-detector

Frequency (MHz)	EUT Pos.	Field strength (dBμV/m) at 3 m	Det	Peak limit (dBμV/m) at 3 m	Margin (dB)	Average limit (dBμV/m) at 3 m	Margin (dB)	Height (cm)	Pol	Azim (deg)	Result
2483.500	Z	41.27	PK	74.00	32.73	54.00	12.73	247.0	H	195.0	Passed

Table 23: Test results of band-edge measurements in advertising mode, EUT position Z, antenna polarization horizontal, without tag

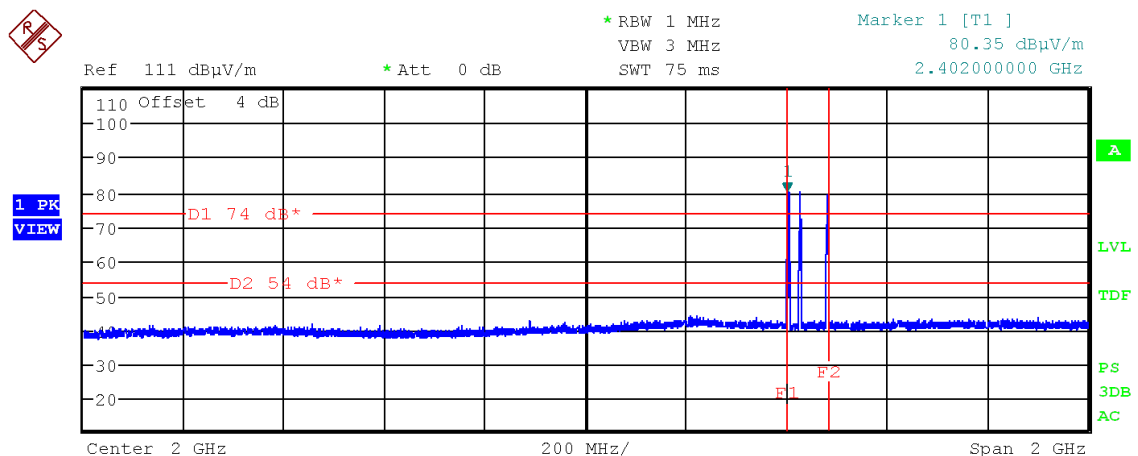


Figure 12: Chart of radiated emissions pre-measurement from 1 GHz to 3 GHz, EUT position Z, antenna polarization horizontal, without tag

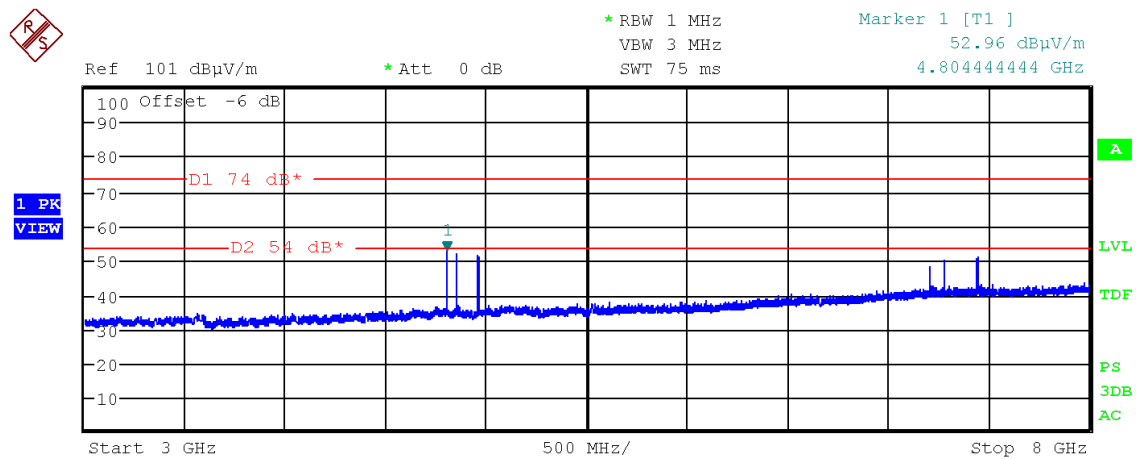


Figure 13: Chart of radiated emissions pre-measurement from 3 GHz to 8 GHz, EUT position Y, antenna polarization vertical, without tag

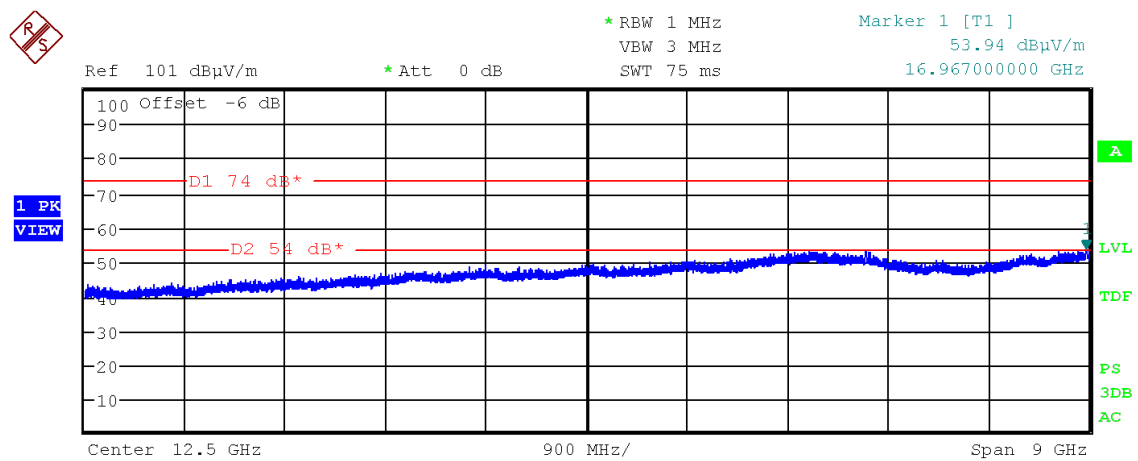


Figure 14: Chart of radiated emissions pre-measurement from 8 GHz to 17 GHz, EUT position Y, antenna polarization vertical, without tag

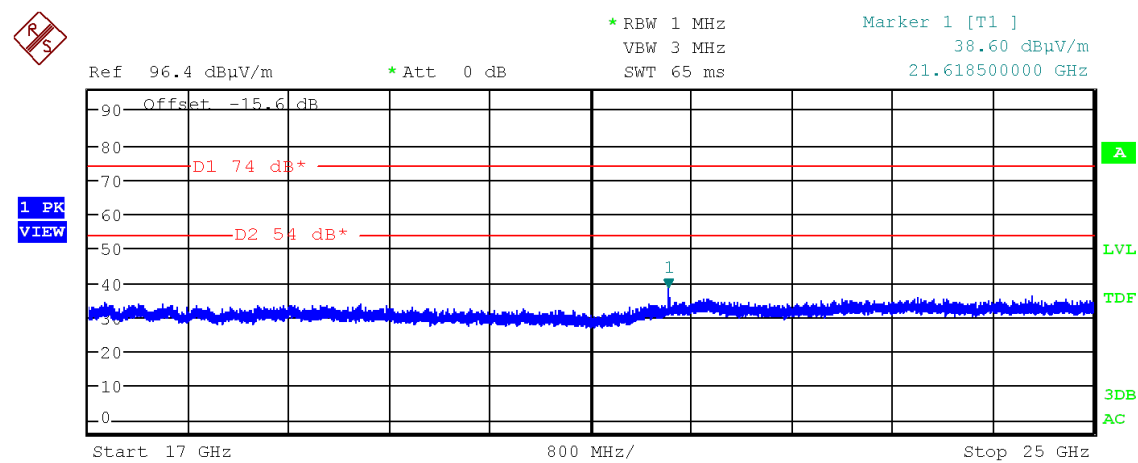


Figure 15: Chart of exploratory radiated emissions measurement from 17 GHz to 25 GHz

<i>Frequency (MHz)</i>	<i>EUT Pos.</i>	<i>Field strength (dB<math>\mu</math>V/m) at 3 m</i>	<i>Det.</i>	<i>Peak limit (dB<math>\mu</math>V/m) at 3 m</i>	<i>Margin (dB)</i>	<i>Average limit (dB<math>\mu</math>V/m) at 3 m</i>	<i>Margin (dB)</i>	<i>Height (cm)</i>	<i>Pol</i>	<i>Azim. (deg)</i>	<i>Result</i>
4803.397	Y	53.93	PK	74.00	20.07	54.00	0.07	202.0	V	330.0	Passed
4852.420	Y	53.24	PK	74.00	20.76	54.00	0.76	204.0	V	330.0	Passed
4960.817	Y	51.65	PK	74.00	22.35	54.00	2.35	204.0	V	330.0	Passed
7206.731	Y	50.80	PK	74.00	23.20	54.00	3.20	210.0	V	305.0	Passed
7276.923	Y	49.64	PK	74.00	24.36	54.00	4.36	208.0	V	305.0	Passed
7439.423	Y	50.62	PK	74.00	23.38	54.00	3.38	208.0	V	305.0	Passed
14290.660	Y	54.41	PK	74.00	19.59	---	---	100.0	V	240.0	Passed
14290.660	Y	41.75	AV	---	---	54.00	12.25	100.0	V	240.0	Passed
16908.830	Y	54.54	PK	74.00	19.46	---	---	100.0	V	150.0	Passed
16908.830	Y	42.30	AV	---	---	54.00	11.70	100.0	V	150.0	Passed

Table 24: Results of radiated emissions test from 1 GHz to 25 GHz

## 8 Equipment calibration status

Description	Modell number	Serial number	Inventory number(s)	Last calibration	Next calibration
EMI test receiver	ESW44	101538	E00895	2022-08	2024-08
EMI test receiver	ESU26	100026	W00002	2022-06	2024-06
EMI test receiver	ESR7	101059	E00739	2022-08	2024-08
Preamplifier (1 GHz – 18 GHz)	BBV 9718 B	00032	W01325	2022-09	2023-10
Preamplifier (18 GHz – 40 GHz)	BBV 9721	43	W01350	2022-11	2023-11
Preamplifier (1 GHz - 18 GHz)	ALS05749	001	W01007	2023-03	2024-03
Loop antenna	HFH2-Z2	871398/0050	E00060	2021-10	2023-10
LISN	ESH2-Z5	881362/037	E00004	Note 1	
LISN	ESH2-Z5	893406/009	E00005	2021-10	2023-10
Field probe	RF-R 400-1	02-2030	E00270	Note 2	
TRILOG broadband antenna (SAC3)	VULB 9162	9162-041	E00643	2021-03	2024-03
Horn antenna	BBHA 9120D	9120D-592	W00053	2022-09	2025-09
Horn antenna	BBHA 9170	9170-332	W00055	2022-08	2023-08
Shielded room	P92007	B 83117 C 1109 T 211	E00107	N/A	
Compact diagnostic chamber (CDC)	VK041.0174	D62128-A502-A69-2-0006	E00026	N/A	
Semi-anechoic chamber (SAC) with floor absorbers	FS-SAC	---	E00100	2021-03	2024-03
Semi-anechoic chamber (SAC)	SAC3	C62128-A520-A643-x-0006	E00716	2021-03	2024-03
Cable set CDC	RG214/U	---	E00446	2023-01	2024-07
	LCF12-50J	---	E01215	2023-01	2024-07
	LMR400	1718020006	E00920	2023-01	2024-07
	RG214 Hiflex	171802007	E00921	2023-01	2024-07
Cable set anechoic chamber	262-0942-1500	005	E00435	2022-04	2023-10
	SF104EA/2x11PC 35-42/5m	11144/4EA	E00307	2023-01	2024-07
	262-0942-1500	003	E00433	2022-04	2023-10
Cable set of semi-anechoic chamber SAC3	SF104EA/11PC35/11PC35/10000M M	501347/4EA	E00755	2023-01	2024-07
	SF104E/11PC35/11PC35/2000MM	507410/4E	E01035	2023-01	2024-07
	SF104E/11PC35/11PC35/2000MM	507411/4E	E01034	2023-01	2024-07

Note(s)

1. Only used for decoupling of support equipment.
2. Only used for relative measurements.

## 9 Measurement uncertainties

Description	Uncertainty	$U_{Limit}$	Note(s)	k=
AC power line conducted emission	$\pm 3.0$ dB	$\pm 3.4$ dB	2b), 3b)	2
Carrier frequency separation	$\pm 1.5$ %	$\pm 5$ %	2a), 3a)	2
Number of hopping frequencies	$\pm 1.5$ %	$\pm 5$ %	2a), 3a)	2
Time of occupancy (dwell time)	$\pm 1.5$ %	$\pm 5$ %	2a), 3a)	2
Bandwidth tests	$\pm 2.0$ %	$\pm 5$ %	2a), 3a)	2
Maximum conducted output power (conducted)	$\pm 2.9$ dB	$\pm 3.0$ dB	2a), 3a)	2
Power spectral density (conducted)	$\pm 2.9$ dB	$\pm 3.0$ dB	2a), 3a)	2
Conducted spurious emissions	$\pm 2.9$ dB	$\pm 3.0$ dB	2a), 3a)	2
Radiated emissions				
from 9 kHz to 30 MHz	$\pm 3.8$ dB	$\pm 4.0$ dB	2b), 3b)	2
from 30 MHz to 1 GHz	$\pm 6.1$ dB	$\pm 6.3$ dB	2b), 3b)	2
from 1 GHz to 6 GHz	$\pm 4.6$ dB	$\pm 5.2$ dB	2b), 3b)	2
from 6 GHz to 18 GHz	$\pm 5.0$ dB	$\pm 5.5$ dB	2b), 3b)	2
from 18 GHz to 26.5 GHz	$\pm 5.4$ dB	$\pm 6.0$ dB	2b), 3c)	2
from 26.5 GHz to 40 GHz	$\pm 6.2$ dB	$\pm 6.5$ dB	2b), 3c)	2

### Note(s):

- The uncertainty stated is the expanded uncertainty obtained by multiplying the standard uncertainty by the coverage factor k. For a confidence level of 95 % the coverage factor k is 2.
- The values of the measurement uncertainty as listed above are calculated according to
  - ETSI TR 100 028-1 V1.4.1 and ETSI TR 100 028-2 V1.4.1
  - CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
- The limits for the measurement uncertainty as listed above are
  - derived from ETSI EN 300 328 V2.1.1
  - equal to  $U_{CISPR}$  taken from CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
  - defined by the test laboratory
- Simple acceptance is applied as the decision rule while keeping the specified limits ( $U_{Limit}$ ) for the expanded measurement uncertainty (i.e. Test Uncertainty Ratio  $TUR \geq 1:1$ ). That means, compliance is based on the recorded level by the lab irrespective of the expanded measurement uncertainty value but with a limitation to it.
- All used test instruments as well as the test accessories are calibrated at regular intervals.



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## 10 Revision history

<i>Revision</i>	<i>Date</i>	<i>Issued by</i>	<i>Description of modifications</i>
0	2023-08-16	Konrad Graßl	First edition

Template: RF\_Colocation\_15.225\_15.209\_15.247\_RSS-210\_RSS-247