

Radio Radio Radio Radio Radio Radio Radio Radio Radio Radio

**Applicant:**

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**Test report no.:**

220470-AU01+W01

**for:**

Uhlmann & Zacher GmbH  
Electronic Door Handle  
EDH420

**according to:**

47 CFR Part 15, §15.225  
RSS-210



**Accreditation:**

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MRA US-EU, FCC designation number: DE0010  
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Department of Innovation, Science and Economic Development Canada (ISED)  
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CAB identifier: DE0011  
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## 1 Summary of test results

System type: RFID Reader

| 47 CFR part and section | Test   | Equivalent to IC radio standard(s) | Page | Result         | Note(s) |
|-------------------------|--|------------------------------------|------|----------------|---------|
| 15.207(a)               | AC powerline conducted emissions   | RSS-Gen, section 8.8               | ---  | Not applicable | 2       |
| 15.215(c)               | 20 dB bandwidth  | ---                                | 24   | Passed         | ---     |
| ---                     | Occupied bandwidth   | RSS-Gen, section 6.7               | 27   | Recorded       | ---     |
| 15.225 (a) – (c)        | Operation within the band 13.110 MHz – 14.010 MHz                        | RSS-210 section B.6 (a) I-III      | 29   | Passed         | ---     |
| 15.225(e)               | Carrier frequency stability  | RSS-210, section B.6 (b)           | 32   | Passed         | ---     |
| 15.225(d)               | Emissions below 30 MHz outside the operating frequency band(s) specified | RSS-210, section B.6 (a) IV        | 36   | Passed         | ---     |
| 15.225(d)               | Spurious emissions from 30 MHz to 1 GHz                                  | RSS-210, section B.6 (a) IV        | 39   | Passed         | ---     |
| 15.225(d)               | Spurious emissions above 1 GHz   | RSS-210, section B.6 (a) IV        | 42   | Passed         | 3       |

Note(s):

- 1 For information about EUT see clause 3.
- 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 Only applicable if the 10<sup>th</sup> harmonic of the intentional transmitter is beyond 1 GHz or 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).

Straubing, July 24, 2023



Tested by  
 Konrad Graßl  
 Department Manager Radio



Approved by  
 Christian Kiermeier  
 Reviewer

## 2 Referenced publications

| <i>Publication</i>   | <i>Title</i>   |
|--|--|
| CFR 47 Part 2<br>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<br>October 2022   | Code of Federal Regulations, Title 47 (Telecommunication), Part 15 (Radio Frequency Devices) of the Federal Communication Commission (FCC)   |
| ANSI C63.10<br>June 2013   | American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices   |
| RSS-Gen Issue 5 April<br>2018 Amendment 1<br>(March 2019) Amendment<br>2 (February 2021) | Spectrum Management and Telecommunications -<br>Radio Standards Specification -<br>General Requirements for Compliance of Radio Apparatus  |
| RSS-210<br>Issue 10, December 2019<br>Amendment (April 2020)                             | Spectrum Management and Telecommunications<br>Radio Standards Specification<br>Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment                                      |

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### 3 Equipment under test (EUT)

All Information in this clause is declared by customer.

#### 3.1 General information

Product type: Electronic Door Handle  
Model name: EDH420  
Serial number(s): 0010E00D  
Manufacturer: Uhlmann & Zacher GmbH  
Version: Hardware: 4.2.2  
Software: edh\_nrf\_CPR\_HW4\_2\_0\_cardReadable\_noTimeout\_app.hex  
Additional modifications: None  
FCC ID: 2APV6-EDH420  
IC registration number: 24382-EDH420  
Designation of emissions: 1K11K1D--  
Power supply: Battery supply  
Nominal voltage: 3 V  
Minimum voltage: 2.65 V  
Maximum voltage: 3.2 V  
Temperature range: -25 °C to +65 °C (customer defined)  
Device type:  Portable  Mobile  Fixed

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### 3.2 Radio specifications

|                             |  |                                    |   |
|-----------------------------|--|------------------------------------|---|
| System type:                | RFID Reader  |                                    |   |
| Application frequency band: | 13.110 MHz – 14.010 MHz  |                                    |   |
| Operating frequencies:      | 13.56 MHz  |                                    |   |
| Short description:          | The EUT is a door handle with a RFID reader operating at 13.56 MHz. The EUT also employs BLE which is in consideration in another test report. |                                    |   |
| Number of RF channels       | 1  |                                    |   |
| Highest internal frequency: | 2480 MHz   |                                    |   |
| Modulation                  | ASK  |                                    |   |
| Antenna:                    | Type:  | PCB antenna                        |   |
|                             | Connector:   | <input type="checkbox"/> external  | <input type="checkbox"/> internal                           |
|                             |  | <input type="checkbox"/> temporary | <input checked="" type="checkbox"/> none (integral antenna) |

### 3.3 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.

## 4 Test configuration and mode of operation

### 4.1 Test configuration

| Device                 | Type designation | Serial or inventory no. | Manufacturer          |
|------------------------|------------------|-------------------------|-----------------------|
| Electronic Door Handle | EDH420           | 0010E00D                | Uhlmann & Zacher GmbH |

Table 1: EUT used for testing

| Device       | Type designation | Serial or inventory no. | Manufacturer          |
|--------------|------------------|-------------------------|-----------------------|
| RFID-tag     | 13.56 MHz        | ---                     | Uhlmann & Zacher GmbH |
| Power supply | 3231.1           | E01235                  | Statron               |

Table 2: Support equipment used for testing

### 4.2 Mode of operation

- The RFID part was set in interrogation mode at 13.56 MHz.
- The BLE part was set in idle mode.

## 5 Test procedures

### 5.1 General specifications

#### 5.1.1 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.

Floor-standing devices are placed either directly on the reference ground-plane or on insulating material (see clause 6.2.3 of ANSI C63.10-2013 for more details).

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.

### 5.2 AC power line conducted emission

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 3: 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.

- b) The measurement equipment is connected to the LISN for the EUT and set-up according to the specifications of the test (see table 3). 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).

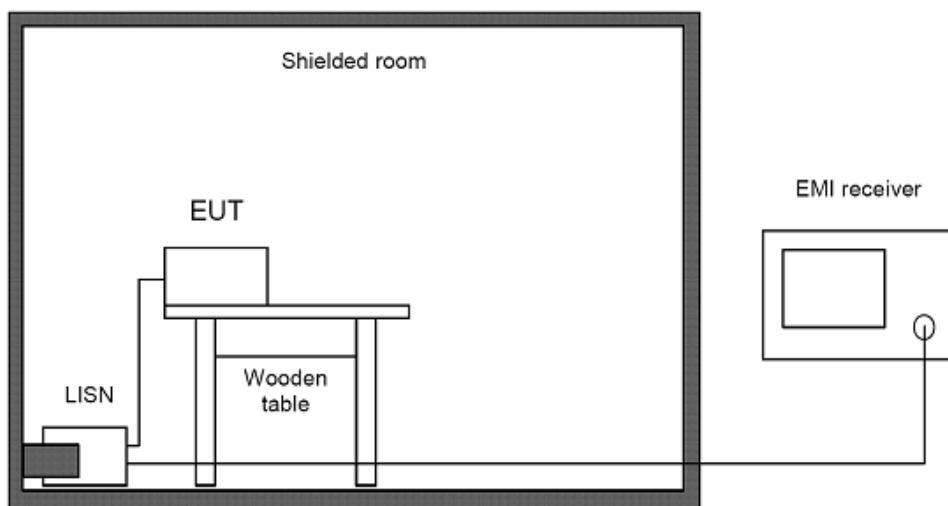


Figure 1: Setup for AC power-line conducted emissions test from 150 kHz to 30 MHz

| 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 4: 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.

### 5.3 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<br>490 kHz $<$ f $\leq$ 1.592 MHz   | 300 m<br>30 m      | 3 m                  | $-40 \log(d_{\text{limit}} / d_{\text{measure}})$  |
| 159 kHz $<$ f $\leq$ 490 kHz<br>1.592 MHz $<$ f $\leq$ 15.923 MHz | 300 m<br>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 5: 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 6.

| Frequency (f)               | Measurement receiver bandwidth | Step size              | Detector type                 |
|-----------------------------|--------------------------------|------------------------|-------------------------------|
| 9 kHz $\leq$ f $<$ 150 kHz  | 200 Hz                         | $\leq 100 \text{ Hz}$  | Peak<br>Quasi-peak<br>Average |
| 150 kHz $\leq$ f $<$ 30 MHz | 9 kHz                          | $\leq 4.5 \text{ kHz}$ | Peak<br>Quasi-peak<br>Average |

Table 6: Bandwidth and detector type for radiated emissions test below 30 MHz

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

Table 7: 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:

### 5.3.1 Automatic 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 6).
- 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° 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.
- f) After the last prescan, the significant maximum emissions and their table positions are determined and collected in a list.
- g) 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.
- 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.

### 5.3.2 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 6).
- 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.

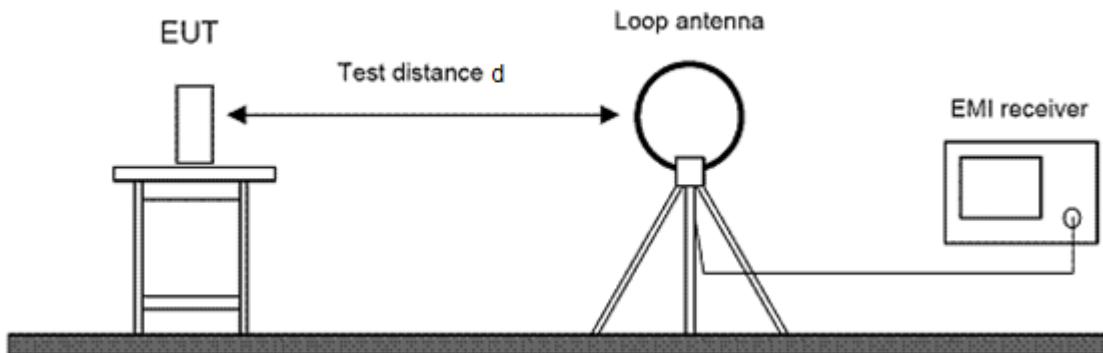


Figure 2: Setup for radiated emissions test below 30 MHz

## 5.4 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 8.

| Frequency (f)      | Measurement receiver bandwidth | Step size | Detector type |                  |            |
|--------------------|--------------------------------|-----------|---------------|------------------|------------|
|                    |                                |           | Prescan       | Prescan with FFT | Final scan |
| 30 MHz ≤ f ≤ 1 GHz | 120 kHz                        | ≤ 60 kHz  | Peak          | Quasi-peak       | Quasi-peak |

Table 8: 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 9: 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:

#### 5.4.1 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 8).
- 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.

#### 5.4.2 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 8).
- 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.
- l) 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.

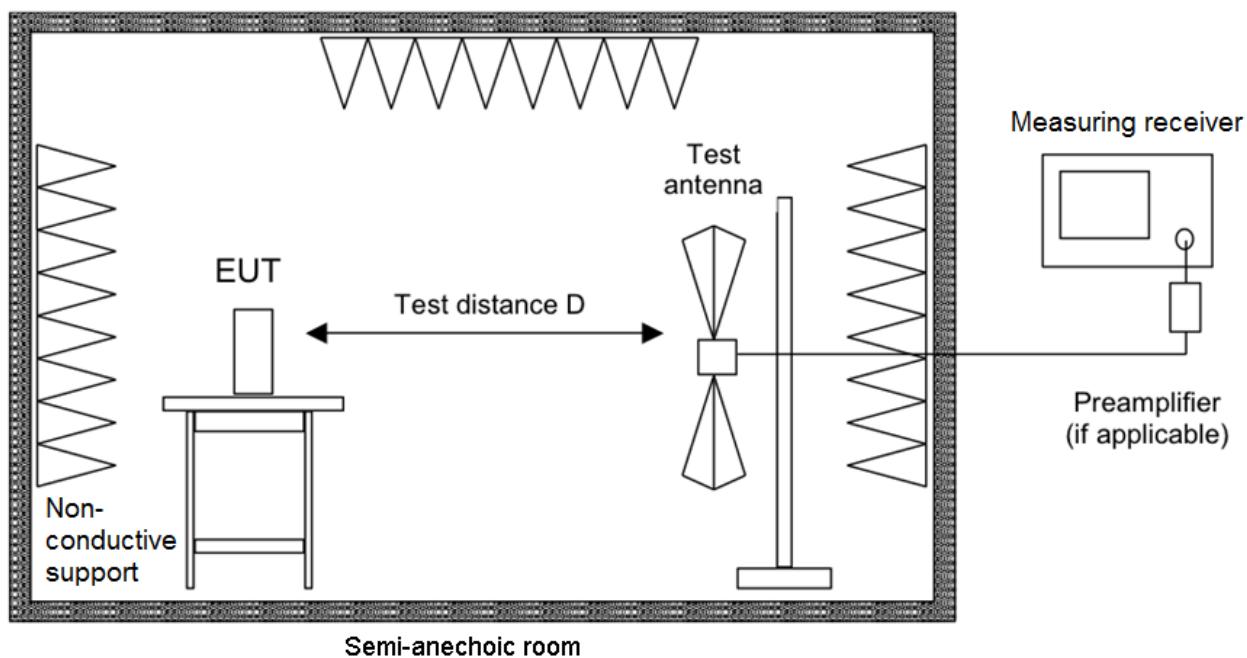


Figure 3: Setup for radiated emissions test from 30 MHz to 1 GHz

## 5.5 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 (dB $\mu$ V) | Antenna correction (dB/m) | Correction pre-amplifier (dB) | Cable attenuation (dB) | Correction factor (Corr.) (dB) | Level (dB $\mu$ V/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 10: Sample calculation

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

SAC3:

Level = Reading value + Correction factor = 50.00 dB $\mu$ V - 14.92 dB/m = 35.08 dB $\mu$ V/m

FS-SAC:

Level = Reading value + Correction factor = 50.00 dB $\mu$ V - 3.30 dB/m = 46.70 dB $\mu$ V/m

### 5.5.1 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 11.

| Frequency (f) | Resolution bandwidth | Video bandwidth | Sweep time | Trace detector(s) |
|---------------|----------------------|-----------------|------------|-------------------|
| f ≥ 1 GHz     | 1 MHz                | 3 MHz           | AUTO       | Max Peak, Average |

Table 11: 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.

## 5.5.2 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 12.

| 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 12: 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:

### 5.5.2.1 Automatic 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 12).
- 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 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) 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 from 1 m to 4 m around this height and the EUT is rotated through 360° around while measuring the emission level continuously.
- n) The worst-case positions of antenna and table and the maximum emission level are recorded.

o) Steps I) 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.

### 5.5.2.2 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 12).
- 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 I) 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.

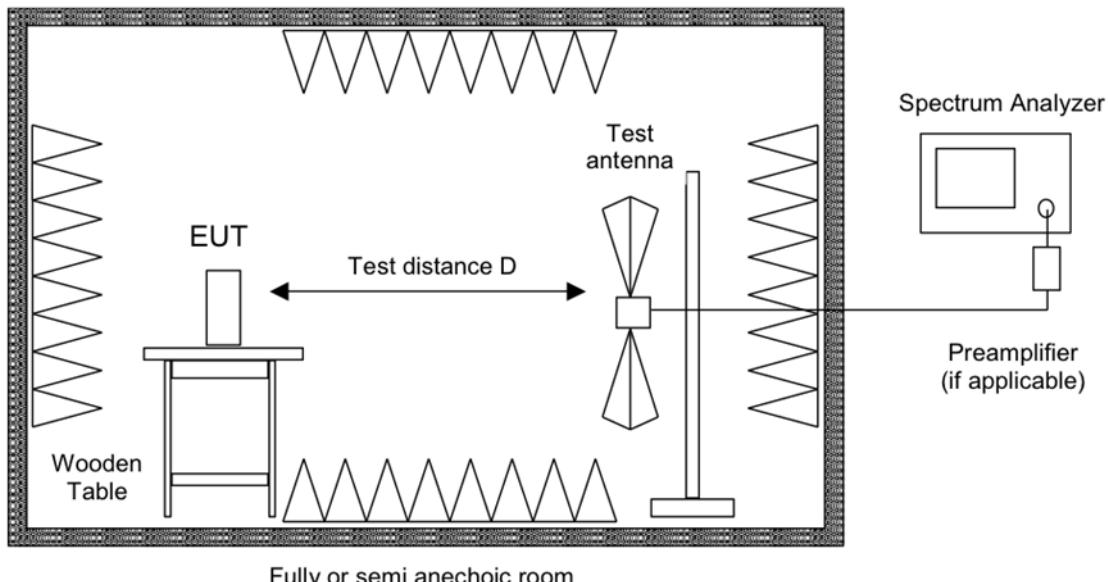


Figure 4: Setup for radiated emissions test above 1 GHz

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## 5.6 Bandwidth measurements

### 5.6.1 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  $[10 \log (20 \text{ dB bandwidth}/\text{RBW})]$  below the reference level.

### 5.6.2 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.

## 5.7 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.

## 5.8 Carrier frequency stability

1. If possible EUT is operating providing an unmodulated carrier. The peak detector of the spectrum analyzer is selected and resolution as well as video bandwidth are set to values appropriate to the shape of the spectrum of the EUT. The frequency counter mode of the spectrum analyzer is used to maximize the accuracy of the measured frequency tolerance.  
If an unmodulated carrier is not available a significant and stable point on the spectrum is selected and the span is reduced to a value that delivers an accuracy which shall be better than 1% of the maximum frequency tolerance allowed for the carrier signal. This method may be performed as long as the margin to the frequency tolerance allowed is larger than the uncertainty of the measured frequency tolerance.
2. The carrier frequency is measured depending on the variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 C.  
For battery operated equipment an external supply voltage can be used and set at the battery nominal voltage, and again at the battery operating end point voltage which must be specified by the equipment manufacturer. Alternatively, tests shall be performed using a new battery.
3. The carrier frequency is measured over a temperature variation of -20 degrees to +50 degrees C at normal supply voltage.

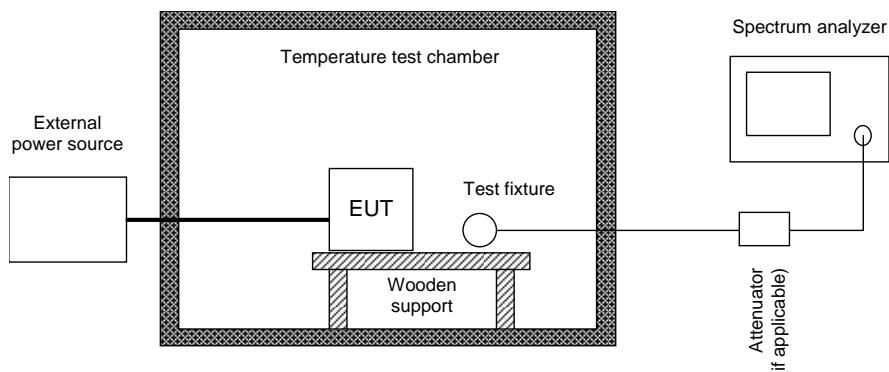


Figure 5: Test setup for carrier frequency stability measurement

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**6      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 47.

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       |

## 6.1 20 dB bandwidth

Section(s) in 47 CFR Part 15: Requirement(s): 15.215(c)  
Reference(s): ANSI C63.10 , clause 6.9

|               |  |                  |                  |
|---------------|--|------------------|------------------|
| Performed by: | Jennifer Riedel B. Eng.  | Date(s) of test: | January 24, 2023 |
| Result:       | <input checked="" type="checkbox"/> Test passed <input type="checkbox"/> Test not passed |                  |                  |

### 6.1.1 Test equipment

| Type              | Designation | Manufacturer       | Inventory no. |
|-------------------|-------------|--------------------|---------------|
| EMI test receiver | ESU 26      | Rohde & Schwarz    | W00002        |
| Field probe       | RF-R 400-1  | Langer EMV-Technik | E00270        |

### 6.1.2 Limits

According to §15.215(c):

Intentional radiators operating under the alternative provisions to the general emission limits must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

### 6.1.3 Test procedure

The 20 dB bandwidth is measured using the conducted measurement procedure using a test fixture with the analyzer settings as described in clause 5.6.1 at normal conditions. Any required results for maximum 20 dB bandwidth under extreme conditions are obtained by addition and subtraction of the upper and lower frequency error results (see clause 6.4.4) to each bandwidth measurement obtained in this test.

### 6.1.4 Test results

Note(s):

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

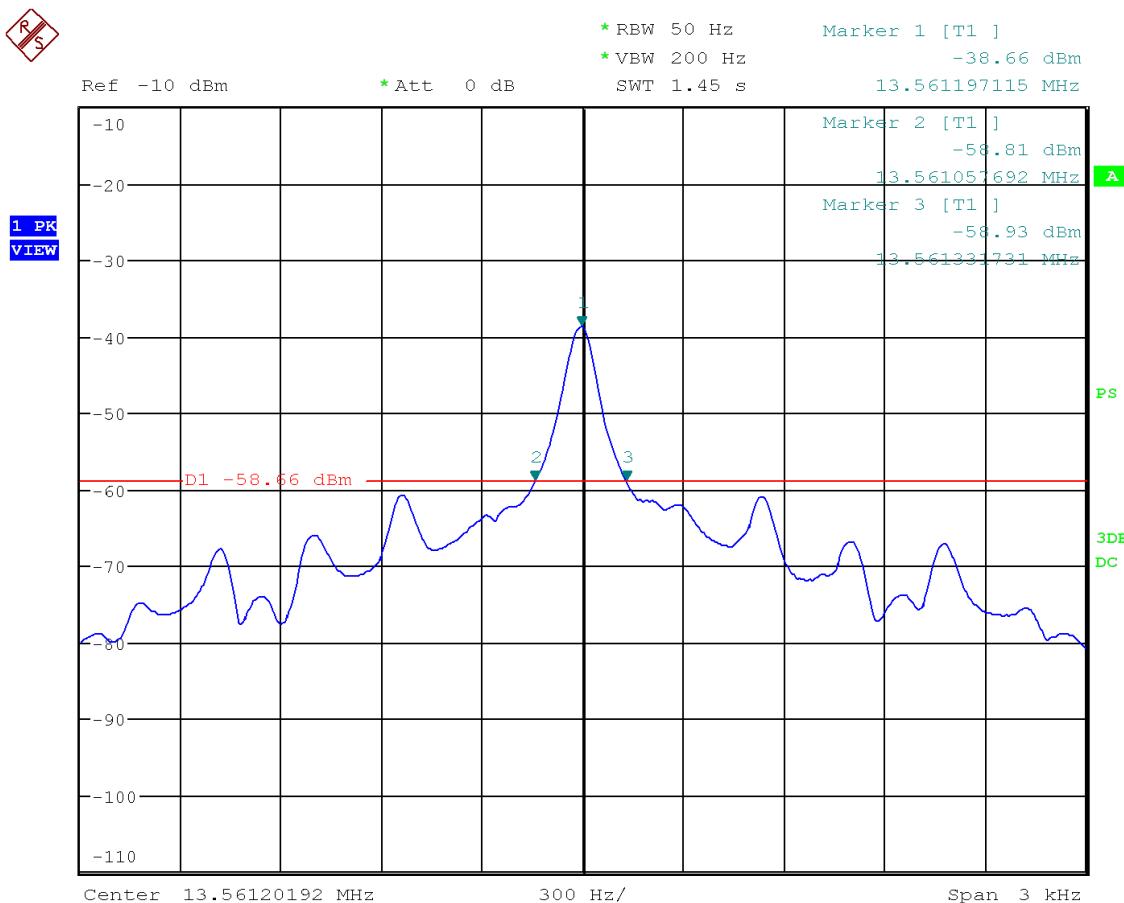


Figure 6: Chart of 20 dB bandwidth tests, without tag

| 20 dB bandwidth<br>(kHz) | Band edge left     |                | Band edge right    |                | Result |
|--------------------------|--------------------|----------------|--------------------|----------------|--------|
|                          | Frequency<br>(MHz) | Limit<br>(MHz) | Frequency<br>(MHz) | Limit<br>(MHz) |        |
| 0.274                    | 13.561058          | 13.553000      | 13.561332          | 13.5670000     | Passed |

Table 13: Results of 20 dB bandwidth tests, without tag

| $f_{assigned}$<br>(MHz) | Index     | $f_{-20dB}$<br>(MHz) | $\Delta f_T$<br>(kHz) | $\Delta f_U$<br>(kHz) | $f_{-20dB(T, U)}$<br>(MHz) | Limit<br>(MHz) | Margin<br>(kHz) | Result |
|-------------------------|-----------|----------------------|-----------------------|-----------------------|----------------------------|----------------|-----------------|--------|
| 13.561197               | low       | 13.561058            | -0.067                | 0                     | 13.560991                  | 13.553000      | 7.991           | Passed |
|                         | high      | 13.561332            | 0.026                 | 0                     | 13.561358                  | 13.567000      | 5.642           | Passed |
|                         | Bandwidth | 0.274 kHz            |                       |                       | 0.367 kHz                  |                |                 |        |

with:

|                     |   |
|---------------------|---|
| $f_{-20dB(low)}$    | = lower frequency in MHz where emission is at least 20 dB below the carrier   |
| $f_{-20dB(high)}$   | = upper frequency in MHz where emission is at least 20 dB below the carrier   |
| $f_{assigned}$      | = assigned frequency in kHz   |
| $\Delta f_{T(low)}$ | = maximum absolute value of negative frequency offset to frequency at nominal conditions caused by temperature variation in kHz |

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$\Delta f_{U(low)}$  = maximum absolute value of negative frequency offset to frequency at nominal conditions caused by voltage variation in kHz

$\Delta f_{T(high)}$  = maximum absolute value of positive frequency offset to frequency at nominal conditions caused by temperature variation in kHz

$\Delta f_{U(high)}$  = maximum absolute value of positive frequency offset to frequency at nominal conditions caused by voltage variation in kHz

$\Delta f_{volt(high)}$  = maximum absolute value of positive frequency offset to frequency at nominal conditions caused by voltage variation in kHz

$f_{20dB(T, U)}$  = frequency in MHz where emission is at least 20 dB below the carrier, including offset caused by variations of temperature and supply voltage as recorded in clause 5.8

Measured -20 dB emission bandwidth:

At nominal conditions:

0.274 kHz

Including variations in temperature and supply voltage:

0.367 kHz

## 6.2 Occupied bandwidth

Section(s) in RSS: Requirement(s): RSS-Gen, section 6.7  
Reference(s): ANSI C63.10, clause 6.9

|               |   |  |                  |
|---------------|---|--|------------------|
| Performed by: | Jennifer Riedel B. Eng.                         | Date(s) of test:                         | January 24, 2023 |
| Result:       | <input checked="" type="checkbox"/> Test passed | <input type="checkbox"/> Test not passed |                  |

### 6.2.1 Test equipment

| Type              | Designation | Manufacturer       | Inventory no. |
|-------------------|-------------|--------------------|---------------|
| EMI test receiver | ESU 26      | Rohde & Schwarz    | W00002        |
| Field probe       | RF-R 400-1  | Langer EMV-Technik | E00270        |

### 6.2.2 Limits

According to 2.1049(i):

Transmitters designed for other types of modulation—when modulated by an appropriate signal of sufficient amplitude to be representative of the type of service in which used. A description of the input signal should be supplied.

According to RSS-Gen, section 6.7:

There is no limit specified, the occupied bandwidth has to be recorded and reported.

### 6.2.3 Test procedure

Occupied bandwidth is measured using the

- radiated measurement procedure with the analyzer settings as described in clause 5.6.2.
- conducted measurement procedure using a test fixture with the analyzer settings as described in clause 5.6.2.

## 6.2.4 Test results

Note(s):

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

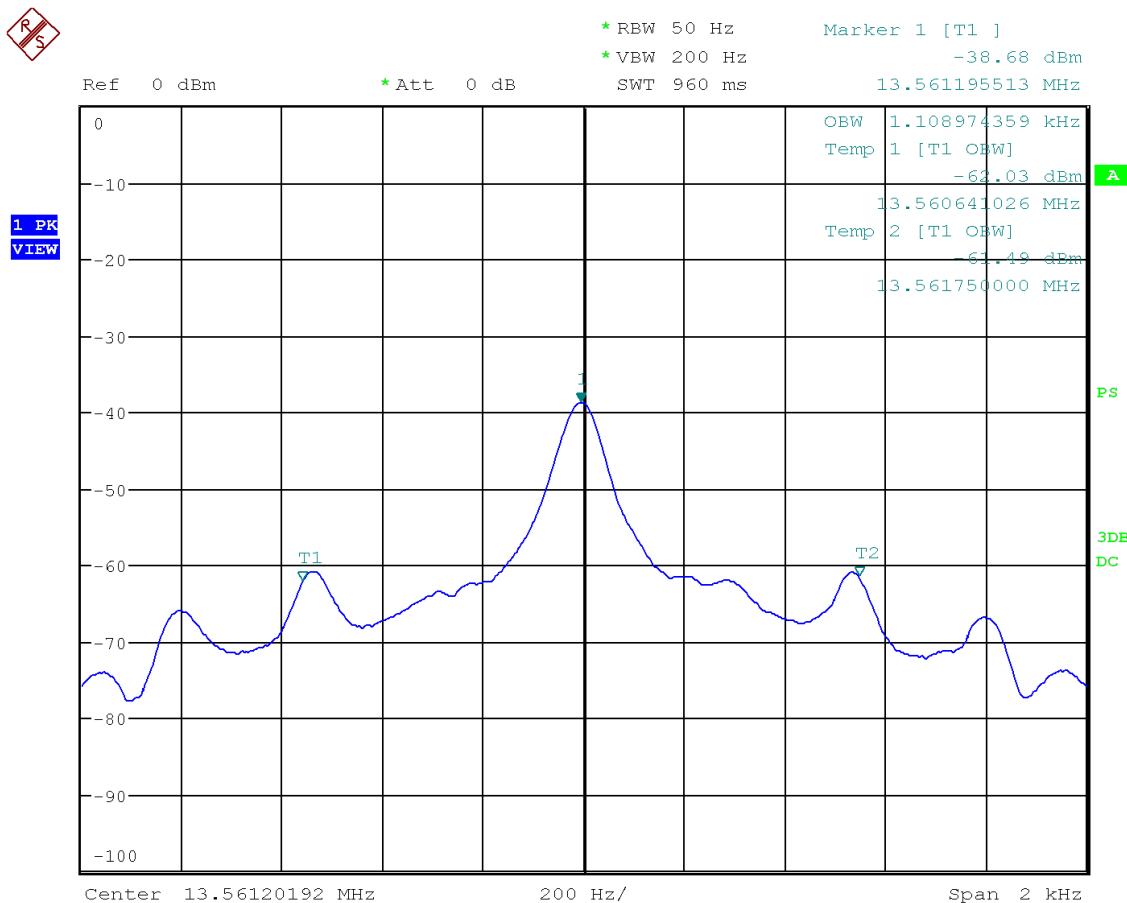


Figure 7: Chart of occupied bandwidth test, without tag

| 99% bandwidth<br>(kHz) | Lower frequency<br>Frequency<br>(MHz) | Higher frequency<br>Frequency<br>(MHz) | Result   |
|------------------------|---------------------------------------|--|----------|
| 1.109                  | 13.560641                             | 13.561750                              | Recorded |

Table 14: Results of occupied bandwidth test, without tag

## 6.3 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: | December 22, 2022 |
| Result:       | <input checked="" type="checkbox"/> Test passed <input type="checkbox"/> Test not passed |                  |                   |

### 6.3.1 Test equipment

| Type                             | Designation               | Manufacturer  | Inventory no.                        |
|----------------------------------|---------------------------|---|--------------------------------------|
| Compact Diagnostic Chamber (CDC) | VK041.0174                | Albatross Projects  | E00026                               |
| EMI test receiver                | ESW 44                    | Rohde & Schwarz   | E00895                               |
| Loop antenna                     | HFH2-Z2                   | Rohde & Schwarz   | E00060                               |
| Cable set CDC                    | RF cable(s)               | Huber + Suhner<br>AME HF-Technik<br>AME HF-Technik<br>Stabo | E00446<br>E00920<br>E00921<br>E01215 |
| Test software                    | EMC32-(M)EB,<br>V10.60.20 | Rohde & Schwarz   | E00777,<br>E00778 or<br>E01073       |

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### 6.3.2 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 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 clause 5.3.

### 6.3.3 Test procedure

The emission within the band 13.110 MHz – 14.010 MHz is measured using the test procedure as described in clause 5.7.

### 6.3.4 Test results

Test distance:  3 m

Antenna alignment:  in parallel  in line

EUT position:  Position X  Position Y  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.

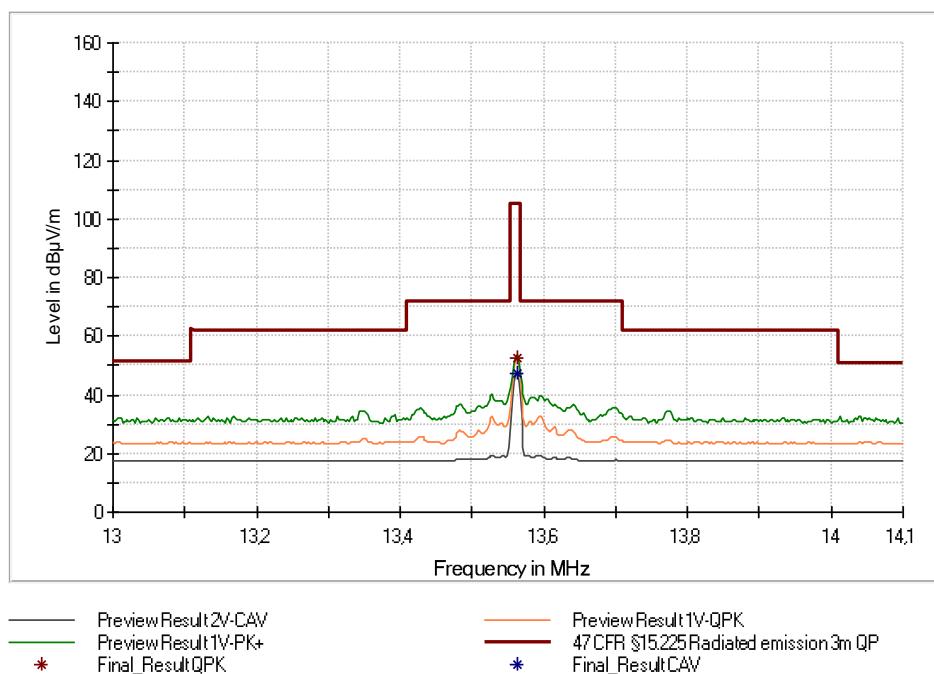


Figure 8: Chart of emission within the band 13.110 MHz to 14.010 MHz, EUT in position X, without tag, antenna in line at 3 m distance

| Frequency (MHz) | Measured field strength (dB $\mu$ V/m) at 3 m | Recalculation factor (dB) | Field strength (dB $\mu$ V/m) at 30 m | Limit (dB $\mu$ V/m) at 30 m | Margin (dB) | Detector | Result |
|-----------------|---|---------------------------|---------------------------------------|------------------------------|-------------|----------|--------|
| 13.56225        | 52.39   | -21.40                    | 30.99                                 | 84.00                        | 53.01       | QP       | Passed |

Table 15: Results of emission within the band 13.110 MHz to 14.010 MHz, EUT in position X, without tag, antenna in line

## 6.4 Carrier frequency stability

Section(s) in 47 CFR Part 15: Requirement(s): 15.225(e)  
Reference(s): ANSI C63.10, section 6.8

Section(s) in RSS: Requirement(s): RSS-210, annex B6 (b)  
Reference(s): RSS-Gen, section 6.11

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Performed by: Jennifer Riedel B. Eng. Date(s) of test: January 24, 2023

Result:  Test passed  Test not passed

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### 6.4.1 Test equipment

| Type                   | Designation | Manufacturer            | Inventory no. |
|------------------------|-------------|-------------------------|---------------|
| Climatic chamber 990 I | VC4100      | Vötsch Industrietechnik | C00014        |
| EMI test receiver      | ESU 26      | Rohde & Schwarz         | W00002        |
| Field probe            | RF-R 400-1  | Langer EMV-Technik      | E00270        |

---

## 6.4.2 Limits

According to §15.225 (e):

The frequency tolerance of the carrier signal shall be maintained within  $\pm 0.01\%$  of the operating frequency over a temperature variation of -20 degrees to +50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery. Alternatively, an external supply voltage can be used and set at the battery nominal voltage, and again at the battery operating end point voltage which must be specified by the equipment manufacturer.

According to RSS-210 section B.6 (b):

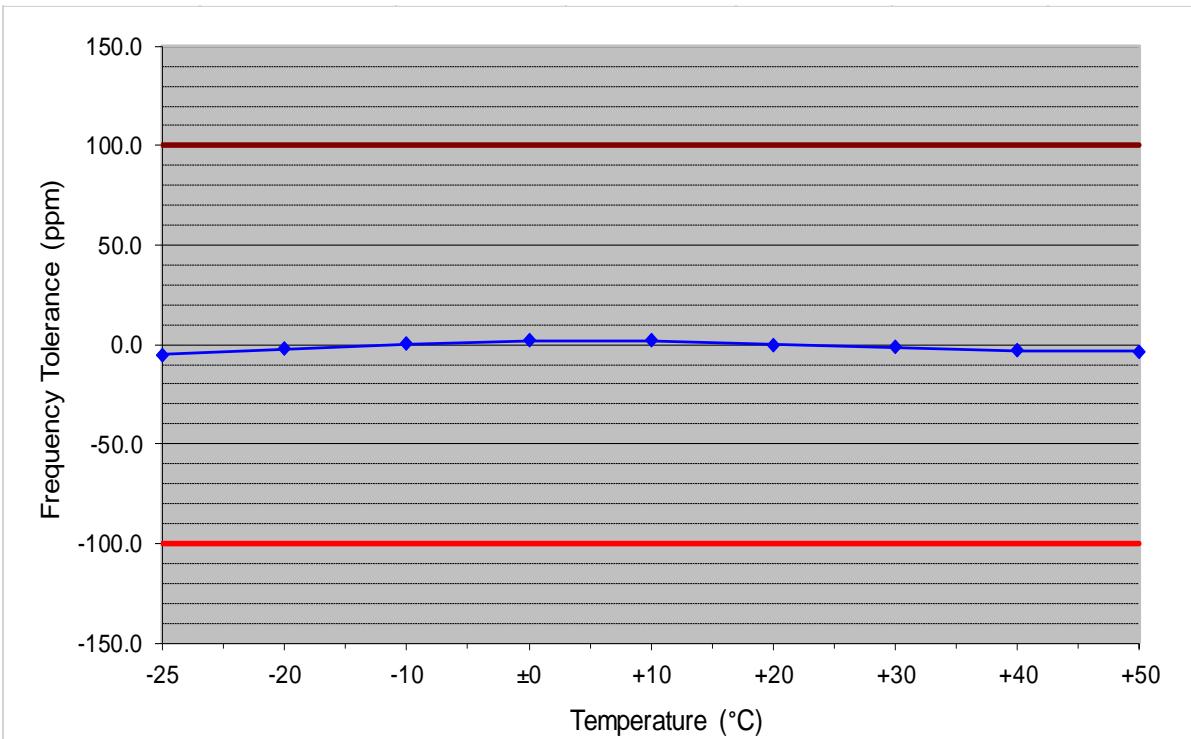
The carrier frequency stability shall not exceed  $\pm 100$  ppm.

## 6.4.3 Test procedure

The carrier frequency stability is measured using the test procedure as described in clause 5.8.

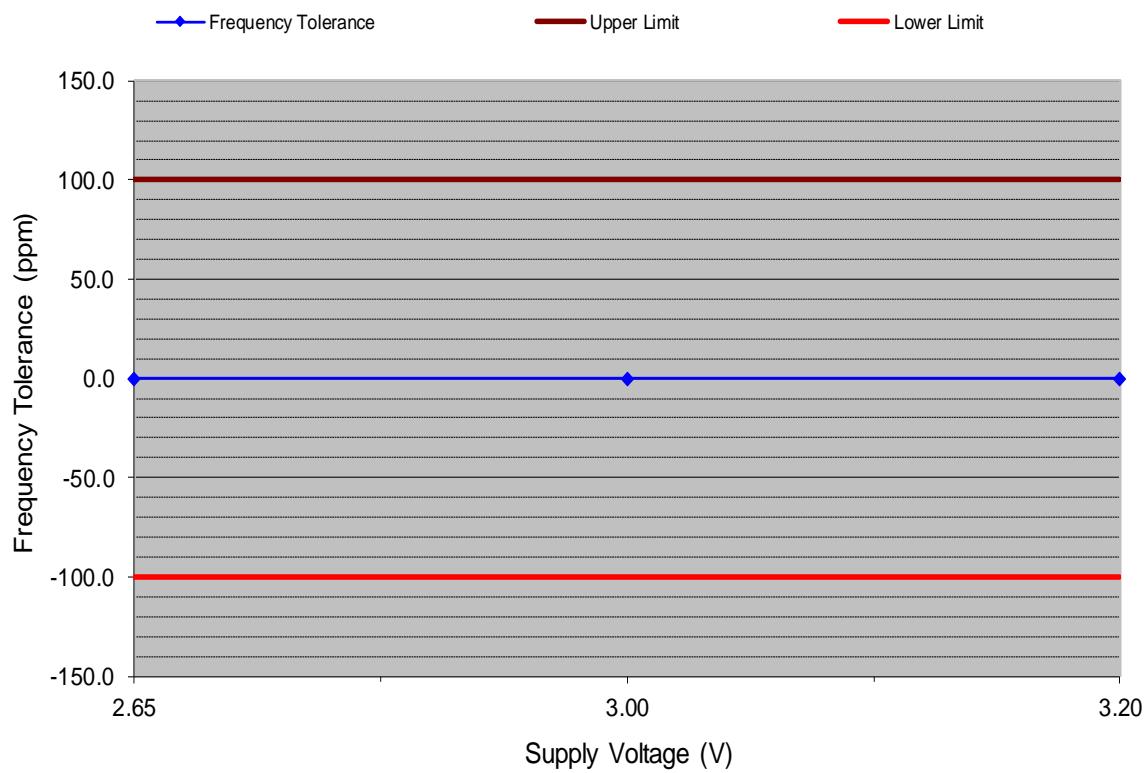
#### 6.4.4 Test results

##### Carrier frequency stability vs. temperature



| Supply voltage:  |                 | 3 V                      | Frequency under nominal conditions: |                   |                   | 13.56119231 MHz |
|------------------|-----------------|--------------------------|-------------------------------------|-------------------|-------------------|-----------------|
| Temperature (°C) | Frequency (MHz) | Frequency Tolerance (Hz) | Frequency Tolerance (ppm)           | Upper Limit (ppm) | Lower Limit (ppm) | Margin (ppm)    |
| -25              | 13.561125       | -67                      | -5.0                                | +100.0            | -100.0            | 95.0            |
| -20              | 13.561160       | -32                      | -2.4                                | +100.0            | -100.0            | 97.6            |
| -10              | 13.561199       | 6                        | 0.5                                 | +100.0            | -100.0            | 99.5            |
| ±0               | 13.561218       | 26                       | 1.9                                 | +100.0            | -100.0            | 98.1            |
| +10              | 13.561218       | 26                       | 1.9                                 | +100.0            | -100.0            | 98.1            |
| +20              | 13.561192       | 0                        | 0.0                                 | +100.0            | -100.0            | 100.0           |
| +30              | 13.561173       | -19                      | -1.4                                | +100.0            | -100.0            | 98.6            |
| +40              | 13.561154       | -38                      | -2.8                                | +100.0            | -100.0            | 97.2            |
| +50              | 13.561144       | -48                      | -3.5                                | +100.0            | -100.0            | 96.5            |
| +60              | 13.561154       | -38                      | -2.8                                | +100.0            | -100.0            | 97.2            |
| +65              | 13.561173       | -19                      | -1.4                                | +100.0            | -100.0            | 98.6            |

## Carrier frequency stability vs. supply voltage



Temperature: +20 °C  
Frequency under nominal conditions: 13.56 MHz

| Supply Voltage (V) | Frequency (MHz) | Frequency Tolerance (Hz) | Frequency Tolerance (ppm) | Upper Limit (ppm) | Lower Limit (ppm) | Margin (ppm) |
|--------------------|-----------------|--------------------------|---------------------------|-------------------|-------------------|--------------|
| 2.65               | 13.561192       | 0                        | 0.0                       | +100.0            | -100.0            | 100.0        |
| 3.00               | 13.561192       | 0                        | 0.0                       | +100.0            | -100.0            | 100.0        |
| 3.20               | 13.561192       | 0                        | 0.0                       | +100.0            | -100.0            | 100.0        |

## 6.5 Emissions below 30 MHz outside the operating frequency band(s) specified

Section(s) in 47 CFR Part 15: Requirement(s): 15.225 (d)  
Reference(s): ANSI C63.10, clause 6.4

Section(s) in RSS: Requirement(s): RSS-210, section B.6 (a) IV  
Reference(s): ANSI C63.10, clause 6.4

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Performed by: Konrad Graßl Date of test: July 24, 2023

Result:  Test passed  Test not passed

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### 6.5.1 Test equipment

| Type                             | Designation | Manufacturer  | Inventory no.                        |
|----------------------------------|-------------|---|--------------------------------------|
| Compact Diagnostic Chamber (CDC) | VK041.0174  | Albatross Projects  | E00026                               |
| EMI test receiver                | ESW 44      | Rohde & Schwarz   | E00895                               |
| Loop antenna                     | HFH2-Z2     | Rohde & Schwarz   | E00060                               |
| Cable set CDC                    | RF cable(s) | Huber + Suhner<br>AME HF-Technik<br>AME HF-Technik<br>Stabo | E00446<br>E00920<br>E00921<br>E01215 |

## 6.5.2 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.

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

Table 16: 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.

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

Table 17: General radiated emission limits up to 30 MHz according to section 8.9 of RSS-Gen

In case of measurements 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 16 and Table 17, using the recalculation factor as described in clause 5.3.

## 6.5.3 Test procedure

The radiated emissions below 30 MHz are measured using the

- manual measurement procedure as described in clause 5.3.
- automatic measurement procedure as described in clause 5.3.

### 6.5.4 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. No assessable emissions could be detected.
3. The operation frequency at 13.56 MHz is not in consideration in this test.
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-Gen limit as it has to 15.209(a) limit.

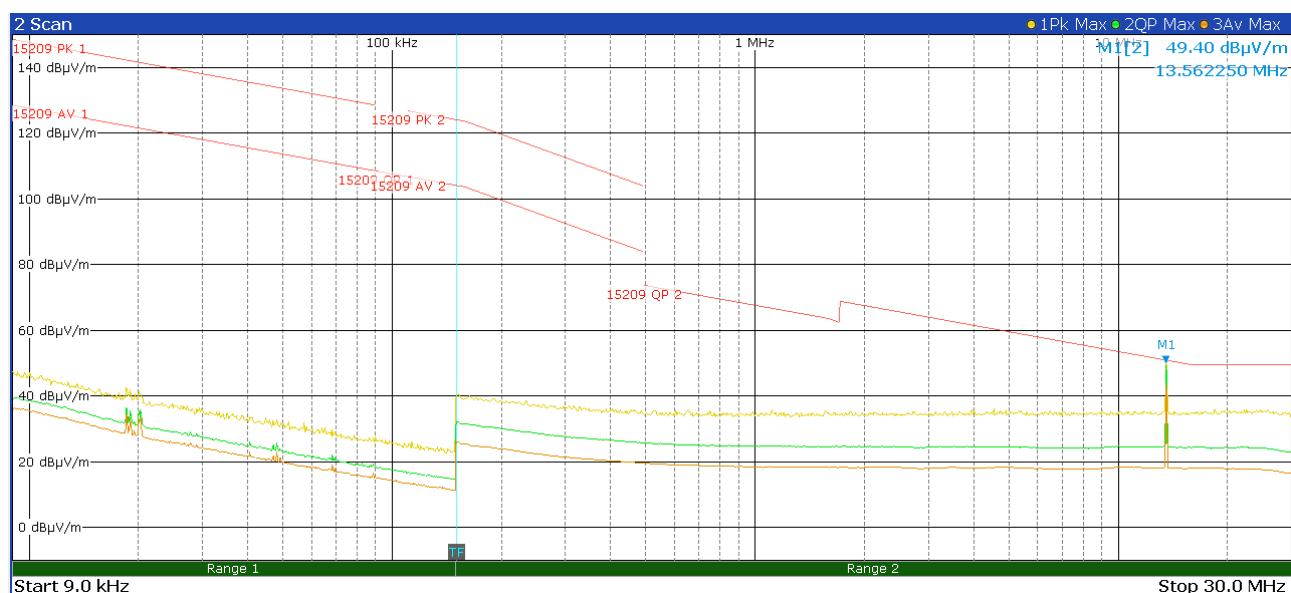


Figure 9: Chart of radiated emissions test below 30 MHz, EUT position X, without tag, antenna in line

## 6.6 Spurious emissions from 30 MHz to 1 GHz

|                               |                                  |  |
|-------------------------------|----------------------------------|--|
| Section(s) in 47 CFR Part 15: | Requirement(s):<br>Reference(s): | 15.225 (d)<br>ANSI C63.10, clause 6.5                  |
| Section(s) in RSS:            | Requirement(s):<br>Reference(s): | RSS-210, section B.6 (a) IV<br>ANSI C63.10, clause 6.5 |

|               |   |  |                  |
|---------------|---|--|------------------|
| Performed by: | Jennifer Riedel B. Eng.                         | Date of test:                            | January 13, 2023 |
| Result:       | <input checked="" type="checkbox"/> Test passed | <input type="checkbox"/> Test not passed |                  |

### 6.6.1 Test equipment

| Type                           | Designation               | Manufacturer       | Inventory no.                  |
|--------------------------------|---------------------------|--------------------|--------------------------------|
| Semi-anechoic chamber (SAC)    | SAC3                      | Albatross Projects | E00716                         |
| EMI test receiver              | ESR 7                     | Rohde & Schwarz    | E00739                         |
| TRILOG broadband antenna (SAC) | VULB 9162                 | Schwarzbeck        | E00643                         |
| Cable set SAC                  | RF cable(s)               | Huber + Suhner     | E00755<br>E01033<br>E01034     |
| Test software                  | EMC32-(M)EB,<br>V10.60.20 | Rohde & Schwarz    | E00777,<br>E00778 or<br>E01073 |

## 6.6.2 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 RSS-210, section B.6 (a) IV:

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

| <i>Frequency<br/>(MHz)</i> | <i>Field strength<br/>(<math>\mu</math>V/m)</i> | <i>Field strength<br/>(dB<math>\mu</math>V/m)</i> | <i>Measurement distance<br/>(m)</i> |
|----------------------------|---|---|-------------------------------------|
| 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 18: General radiated emission limits  $\geq$  30 MHz according to §15.209 and RSS-Gen

## 6.6.3 Test procedure

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

- manual measurement procedure as described in clause 5.4.
- automatic measurement procedure as described in clause 5.4.

#### 6.6.4 Test results

Test distance:  3 m

EUT position:  Position X  Position Y  Position Z

Note(s):

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

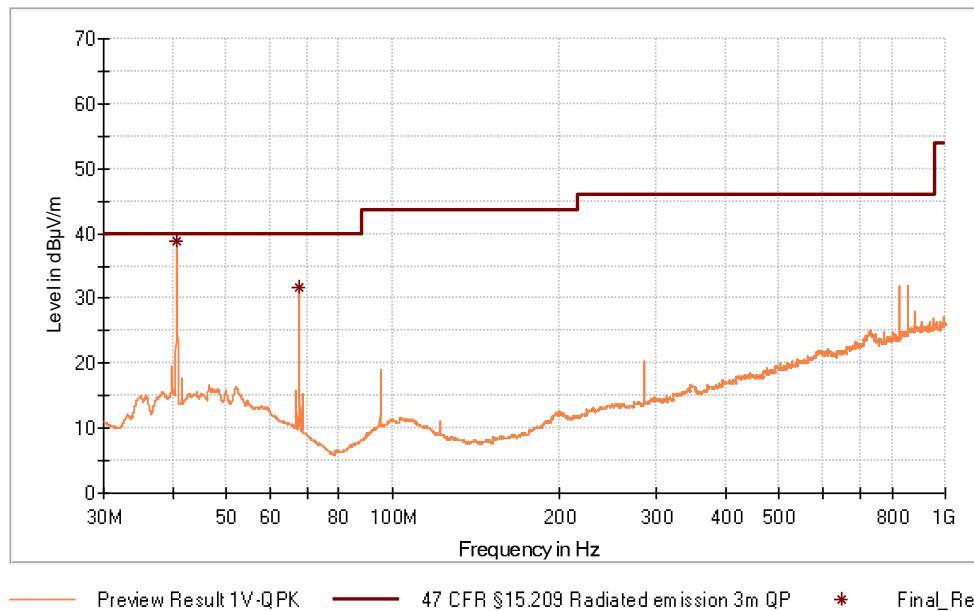


Figure 10: Chart of radiated emissions test from 30 MHz to 1 GHz, EUT position X, with tag, antenna vertical

| Frequency (MHz) | Field strength (dB $\mu$ V/m at 3 m) | Limit (dB $\mu$ V/m) at 3 m | Margin (dB) | Height (cm) | Pol. | Azimuth (deg) | Corr. (dB/m) | Result |
|-----------------|--------------------------------------|-----------------------------|-------------|-------------|------|---------------|--------------|--------|
| 40.680000       | 38.84                                | 40.00                       | 1.16        | 100.0       | V    | 76.0          | 13.7         | Passed |
| 67.800000       | 31.68                                | 40.00                       | 8.32        | 100.0       | V    | 257.0         | 11.4         | Passed |

Table 19: Results of radiated emissions test from 30 MHz to 1 GHz, with tag

## 6.7 Spurious emissions above 1 GHz

|                               |                                  |  |
|-------------------------------|----------------------------------|--|
| Section(s) in 47 CFR Part 15: | Requirement(s):<br>Reference(s): | 15.225 (d)<br>ANSI C63.10, clause 6.6                  |
| Section(s) in RSS:            | Requirement(s):<br>Reference(s): | RSS-210, section B.6 (a) IV<br>ANSI C63.10, clause 6.6 |

|               |   |  |                   |
|---------------|---|--|-------------------|
| Performed by: | Jennifer Riedel B. Eng.                         | Date of test:                            | December 16, 2022 |
| Result:       | <input checked="" type="checkbox"/> Test passed | <input type="checkbox"/> Test not passed |                   |

### 6.7.1 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                     |
| Preamplifier (17 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<br>Huber + Suhner<br>Teledyne Reynolds | E00435<br>E00307<br>E00433 |

## 6.7.2 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 RSS-210, section B.6 (a) IV:

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

| <i>Frequency<br/>(MHz)</i> | <i>Field strength<br/>(<math>\mu</math>V/m)</i> | <i>(dB<math>\mu</math>V/m)</i> | <i>Measurement distance<br/>(m)</i> |
|----------------------------|---|--------------------------------|-------------------------------------|
| Above 960                  | 500   | 54                             | 3                                   |

Table 20: General radiated emission limits above 960 MHz according to §15.209 and RSS-Gen

## 6.7.3 Test procedure

The radiated emissions above 1 GHz are measured using the

- manual measurement procedure as described in clause 5.5.
- automatic measurement procedure as described in clause 5.5.

## 6.7.4 Test results

|                |  |  |
|----------------|--|--|
| Test distance: | Exploratory tests:   | <input checked="" type="checkbox"/> 0.5 m                              |
|                | Final tests:   | <input type="checkbox"/> 3 m <input checked="" type="checkbox"/> 1.5 m |
| EUT position:  | <input checked="" type="checkbox"/> Position X <input 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 are 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, than it is unnecessary to perform an average measurement.
- 5 In the frequency range from 17 GHz to 25 GHz were no assessable emissions detected. The documented plot is only representative.

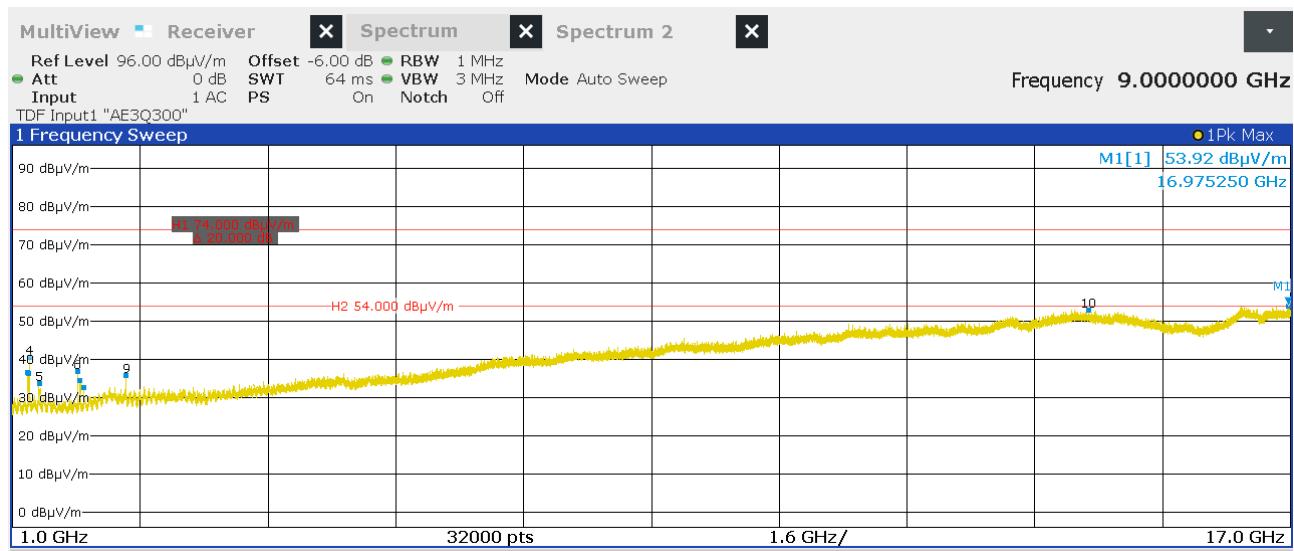


Figure 11: Chart of emissions test from 1 GHz to 17 GHz, EUT position Y, with tag, antenna polarization vertical

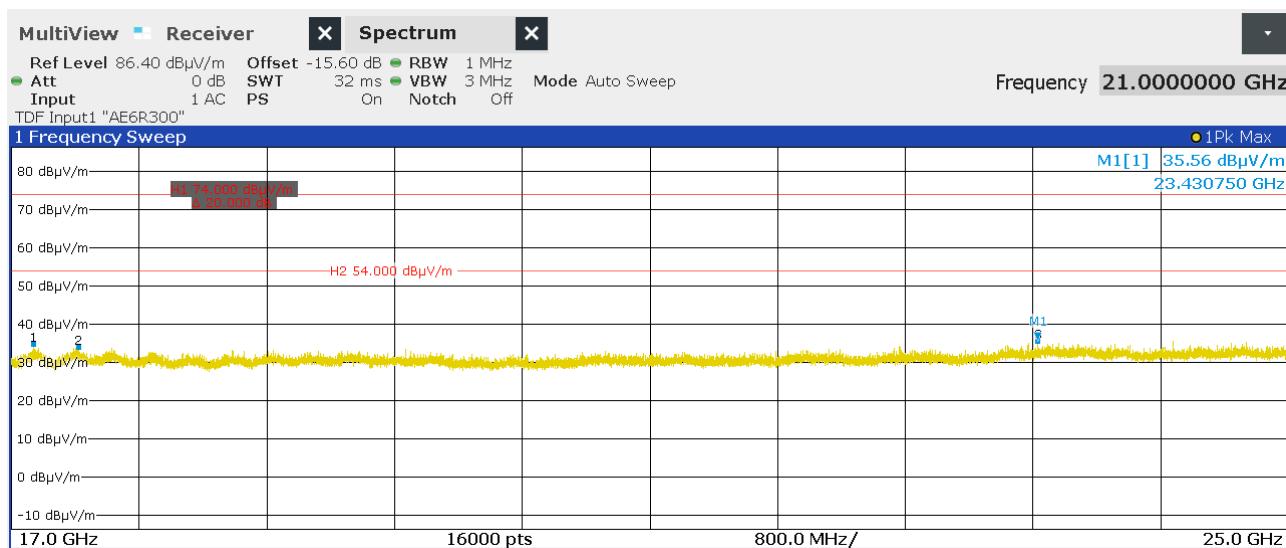


Figure 12: Chart of exploratory emission test from 17 GHz to 25 GHz, without tag

| 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 |
|-----------------|----------|--------------------------------|------|----------------------------|-------------|-------------------------------|-------------|-------------|------|-------------|--------|
| 1215.250        | Y        | 40.41                          | PK   | 74.00                      | 33.59       | 54.00                         | 13.59       | 155.0       | V    | 202.0       | Passed |
| 1815.250        | Y        | 36.82                          | PK   | 74.00                      | 37.18       | 54.00                         | 17.18       | 153.0       | V    | 181.0       | Passed |
| 14600.350       | Y        | 52.76                          | PK   | 74.00                      | 21.24       | 54.00                         | 1.24        | 211.0       | V    | 55.0        | Passed |
| 16975.000       | Y        | 53.99                          | PK   | 74.00                      | 20.01       | 54.00                         | 0.01        | 108.0       | V    | 325.0       | Passed |

Table 21: Results of emissions test from 1 GHz to 25 GHz

## 7 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 /11PC35/10000MM | 501347/4EA              | E00755              | 2023-01          | 2024-07          |
|  | SF104E/11PC35/1 1PC35/2000MM   | 507410/4E               | E01035              | 2023-01          | 2024-07          |
|  | SF104E/11PC35/1 1PC35/2000MM   | 507411/4E               | E01034              | 2023-01          | 2024-07          |

### Note(s)

- Only used for decoupling of support equipment.
- Only used for relative measurements.

## 8 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 stability      | $\pm 0.1$ ppm | $\pm 0.5$ ppm | 2a), 3d) | 2    |
| Bandwidth tests                  | $\pm 2.0$ %   | $\pm 5$ %     | 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):

- 1 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.
- 2 The values of the measurement uncertainty as listed above are calculated according to
  - a) ETSI TR 100 028-1 V1.4.1 and ETSI TR 100 028-2 V1.4.1
  - b) CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
- 3 The limits for the measurement uncertainty as listed above are
  - a) derived from ETSI EN 300 328 V2.1.1
  - b) equal to  $U_{CISPR}$  taken from CISPR 16-4-2:2011-06 + A1:2014-02 + A2:2018-08
  - c) defined by the test laboratory
  - d) derived from ETSI EN 300 220-1 V3.1.1
- 4 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.
- 5 All used test instruments as well as the test accessories are calibrated at regular intervals.

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**9 Revision history**

| <i>Revision</i> | <i>Date</i> | <i>Issued by</i> | <i>Description of modifications</i> |
|-----------------|-------------|------------------|-------------------------------------|
| 0               | 2023-07-24  | Konrad Graßl     | First edition                       |

Template: RF\_15.225\_RSS-210\_V1.7