

**Advanced  
Compliance Laboratory**

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## **Electromagnetic Emission Compliance Test Report**



**Equipment Under Test  
(EUT)** MK6 GROUND

**Model** GROUND 1820

**Applicant** Kontur US, Inc.  
1 Pequot Ave. 2<sup>nd</sup> FL  
Port Washington, NY 11050

**In Accordance With** FCC Part 15, Subpart F  
Industry Canada RSS-220 (Issue 1/2009+A1/2018)

**Tested by** Advanced Compliance Laboratory, Inc.  
210 Cougar Court  
Hillsborough, New Jersey 08844

**Authorized by** Wei Li  
Lab Manager

Signature

**Date** May 20, 2024

**AC Lab Report  
Number** 0048-240304-01-FCC-IC



**The test result in this report is supported and  
covered by the ANAB accreditation (Certificate  
No. AT-3288).**

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## Section 1. Summary of Test Results

Manufacturer: Kontur. Inc.

Product Name: MK6 GROUND

Model/Parts No. : GROUND 1820

FVIN: aru-v1.1.0  
S/N: 23002

General: **All measurements are traceable to national standards**

These tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with FCC Part 15, Sub Part F and Industry Canada RSS-220 (Issue 1/2009+A1/2018).

New Submission

Production Unit

Class II Permissive Change

Pre-Production Unit

THIS TEST REPORT RELATES ONLY TO THE ITEM(S) TESTED.

THE FOLLOWING DEVIATIONS FROM, ADDITIONS TO, OR EXCLUSIONS FROM THE TEST SPECIFICATIONS HAVE BEEN MADE.

“See Summary of Test Data”



**ANAB LAB Certificate #: AT-3288**

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## Summary of Test Data

Compliance Requirement	FCC & IC Rule Part	Test No. in Section 4	Result
<b>Cross Reference</b>	15.505 &RSS-GEN	1	Complies
<b>Marketing of UWB Equipment</b>	15.507 &RSS-GEN	2	Complies
<b>Pulse Repetition Frequency(PRF)</b>	15.509 &RSS-220 6.2	3	Complies
<b>UWB Bandwidth</b>	15.509(a) &RSS-220 6.2.1(a)	4	Complies
<b>General Operational Requirements for LF Imaging System</b>	15.509(b) &RSS-220 6	5	Complies
<b>Spurious Radiated Emissions≤960MHz</b>	15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d)	6	Complies
<b>Spurious Radiated Emissions&gt;960MHz</b>	15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d)	7	Complies
<b>Radiated Emissions in GPS Bands</b>	15.509(e) 15.209 &RSS- 220 6.2(e)	8	Complies
<b>Highest Radiated Emission at <math>f_M</math></b>	15.509(f) 15.209 &RSS- 220 6.2(g)	9	Complies
<b>Technical Requirements Applicable to All UWB Devices</b>	15.521	10	Complies
<b>Coordination Requirement</b>	15.525	11	N/A
<b>Antenna Requirement</b>	15.203& 15.204 &RSS-GEN 7.1.4	12	Complies
<b>Radio Frequency Exposure</b>	FCC OET Bulletin 65 &RSS-GEN	13	N/A
<b>Conducted Emissions</b>	15.507 &RSS-GEN	14	*
<b>Transmission Duration</b>	15.509(c) &15.519(a)(1)	15	**
<b>Additional Tests per Wavier DA 13-1739 Conditions</b>	DA 13-1739	See Report# FCC-004	Complies

\* NOT APPLICABLE to the EUT as it is a dc/battery powered device;

\*\* NOT APPLICABLE based on product design.

The estimated uncertainty of the test result is given as following. The method of uncertainty calculation is provided in Advanced Compliance Lab. Doc. No. 0048-01-01.

Four specific test set ups in the 3m/10m open site of Advanced Compliance Lab are evaluated for the purpose of uncertainty calculations. Six important factors are considered: antenna, cable, EMI receiver, site imperfections, LISN, and system repeatability. The following table shows the uncertainty budget for radiated emission and conducted emission testing measurements.

Contribution*	Prob. Dist.	Uncertainty (dB)	Uncertainty (dB)	Uncertainty (dB)	Uncertainty (dB)
		Biconical	Log-Per.	Horn Ant.	Conducted
Antenna factor calibration	nom. k=2	$\pm 0.93$	$\pm 1.2$	$\pm 0.37$	N/A
Cable loss calibration	norm.k=2	$\pm 0.25$	$\pm 0.25$	$\pm 0.5$	$\pm 0.25$
LISN calibration	rect.	N/A	N/A	N/A	$\pm 0.98$
EMI receiver specification	rect.	$\pm 1.3$	$\pm 1.3$	$\pm 2.0$	$\pm 1.3$
Site imperfections	rect.	$\pm 1.64$	$\pm 1.64$	$\pm 2.0$	N/A
System repeatability	norm.k=2	$\pm 0.5$	$\pm 0.5$	$\pm 0.5$	$\pm 0.25$
Combined Std. Uncertainty $u_c$	norm.	$\pm 2.36$	$\pm 2.48$	$\pm 2.94$	$\pm 1.67$
Expanded Uncertainty $U_{lab}$	norm.k=2	$\pm 4.72$	$\pm 4.95$	$\pm 5.88$	$\pm 3.33$

***Decision Rule For Emission Tests: Pass or Fail***

*Pass: when emission level is ON or LESS THAN the related standard limit with zero dB margin OR customer specified margin to the limit;*

*Fail: when emission level is LESS THAN the related standard limit with zero dB margin OR customer specified margin to the limit.*



Wei Li  
Lab Manager  
Advanced Compliance Lab

Date: May 20, 2024

## Section 2. General Equipment & Test Configuration

### 2.1. EUT Specification

<b>EUT</b>	The MK6 Ground , Model No. <b>GROUND 1820</b> , manufactured by Kontur, is an SFCW radar system intended to be used in non-destructive testing and geophysical Surveying.
<b>Supply Voltage</b>	Power-over-Ethernet / External 12-48Vdc
<b>Operating Frequency</b>	140-3000 MHz
<b>-10dB UWB Bandwidth</b>	2,372.4MHz ( 627.2-2999.6MHz)
<b>Modulation Type</b>	SFCW
<b>Peak Emissions in a 50 MHz Bandwidth</b>	Max. peak emissions: <u>66.7dBuV/m (RBW=3MHz) @2,250MHz</u> (-4.1dBm vs limit 0dBm)
<b>Antenna</b>	An array of broadband resistively loaded bow-tie monopole antennas
<b>Hardware Version</b>	A0
<b>Software Version</b>	aru-v1.1.0

### 2.2. Description of Operation

The Kontur system is a three-dimensional step-frequency continuous wave ground penetrating radar (SFCW GPR). This product transmits electromagnetic waves through an antenna array and measures the echo from layers of the ground and objects buried within the subsurface. Measurements of the subsurface are calculated using the travel time from when the signal is transmitted until the echo is received. A depth estimate is

obtained by multiplying this time with the wave velocity of the signal. In the field, the system is powered from PoE Injector which is connected to DC/Battery power delivery system.

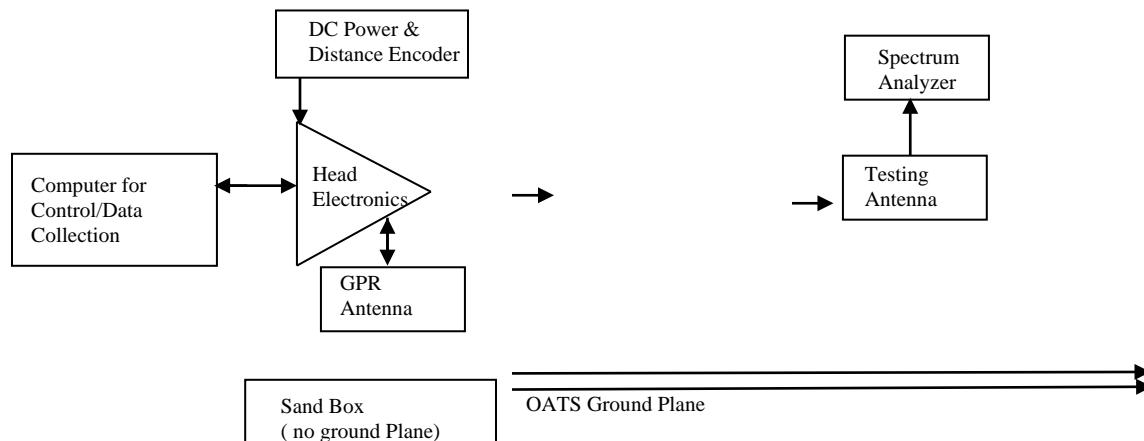
### 2.3. System Diagram

See Attachment provided by Applicant.

### 2.4. General EUT Setup

The EUT is operated in continuous transmission mode with the antennas permanently mounted in an all in one plastic housing with the controlling electronics and battery.

All measurements shall be made at room temperature and at nominal DC input voltage (provided by a battery). The EUT is placed directly on the dry sand with no ground plane under it.



### 2.5. Operational Frequency channel(s) for testing:

#### 2.5. Operational Frequency channel(s) for testing:

- Digital Clocks: 62.5MHz, 125MHz, 1GHz
- RF antenna frequencies for TX modulations: 140-3000MHz

### Section 3. Test Methodology & Facilities

#### 3.1 Measurement Procedure

The tests documented in this report were performed in accordance with ANSI C63.4 /C63.10, FCC CFR 47 Part 2 & 15, Industry Canada RSS-220 (Issue 1/2009) & FCC Order, ET Docket No. 980153(FCC02-08). Test procedure described in FCC “KDB 393764, UWB Compliance Measurements” is used in this report. The test methods used to generate the data in this test report is in accordance with ANSI C63.10:2013, American National Standard for Testing Unlicensed Wireless Devices.

In accordance with ANSI C63.10:2013, Section 10.2.2, the device under test was placed on a bed of dry sand and rotated through 16 azimuth angles (Clause 5.4) to determine which produced the highest emission relative to the limit. The azimuth that produced the highest emission relative to the limit was used for all radiated emission measurements.

Specific requirements for Waiver DA 13-1739 are complied, shown in separate exhibit, Array2020-Waiver Test Report #FCC-004, dated 2024-04-10.

#### 3.2. Facilities and Accreditation

The test sites and measurement facilities used to collect data are located at Hillsborough, New Jersey, USA. The sites are constructed in conformance with the requirements of ANSI C63.4, ANSI C63.7 and CISPR Publication 32. All receiving equipment conforms to CISPR Publication 16-1, “Radio Interference Measuring Apparatus and Measurement Methods”.

The open area test site and conducted measurement facility used to collect the radiated and conducted data are located at Hillsborough, New Jersey. This site is accepted by FCC to perform measurements under Part 15 or 18 (Registration # 185968, MRA designation No. US3288) and also designated by IC as “ site IC 3130A”. The ANAB Certificate Number for ISO/IEC 17025 accreditation is AT-3288 (expiry date: 2/27/2026).

#### 3.3. Test and Measurement Equipment

The following test and measurement equipment was utilized for the tests documented in this report:

Manufacture	Model	Serial No.	Description	Cal Due dd/mm/yy
Hewlett-Packard	HP8546A	3448A00290	EMI Receiver	25/09/24
Agilent	E4440A	US40420700	3Hz-26.5GHz Spectrum Analyzer	17/06/24
EMCO	3104C	9307-4396	20-300MHz Biconical Antenna	15/01/25
EMCO	3146	9008-2860	200-1000MHz Log-Periodic Antenna	15/01/25
EMCO	3115	4945	Double Ridge Guide Horn Antenna	22/01/25

All Test Equipment Used is Calibrated, Traceable to NIST Standards. 2 Year Interval.

## Section 4. Measurement Data

Test No.1

<b>Name of Test:</b>	<i>Cross Reference</i>	<b>Test Standard:</b>	<b>15.505 &amp;RSS-GEN</b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** 15.505(a)

**Standard:** Equipment under test complies with all the relevant and applicable requirements of Subpart A, Subpart B and Section 15.201 through 15.204 and Section 15.207 of Subpart C. 15.505(b)

The Digital circuitry portion of the EUT has been tested and verified to comply with 47 CFR Part 15, subpart B.

**Method of Measurement:** a) Except where specifically stated otherwise within this subpart, the provisions of Subparts A and B and of Sections 15.201 through 15.204 and Section 15.207 of Subpart C of this part apply to unlicensed UWB intentional radiators. The provisions of Sections 15.35(c) and 15.205 do not apply to devices operated under this subpart. The provisions of Footnote US 246 to the Table of Frequency Allocations contained in Section 2.106 of this chapter do not apply to devices operated under this subpart.

b) The requirements of Subpart F apply only to the radio transmitter, i.e., the intentional radiator, contained in the UWB device. Other aspects of the operation of a UWB device may be subject to requirements contained elsewhere in this chapter. In particular, a UWB device that contains digital circuitry not directly associated with the operation of the transmitter also is subject to the requirements for unintentional radiators in Subpart B of this chapter. Similarly, an associated receiver that operates (tunes) within the frequency range 30 MHz to 960 MHz is subject to the requirements in Subpart B of this chapter.

**Test Result:**

**Complies**

**Test Data:**

**Data and Plots**

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

***Spurious Radiated Emissions from Digital Circuitry (RF off) complies with FCC Part 15.109 (Class A), measured per ANSI C63.4 with standard setup.***

Freq.* (MHz)	H,V	PK/QP Reading (dB $\mu$ V/ m)	Height (m)	Angle (degree)	Refer to Part 15.109 10m Limit** (dB $\mu$ V/m)	Margin (dB)	Result
57.8	H	33.5	1.8	045	39.1	-5.6	Pass
67.4	H	25.5	1.8	045	39.1	-13.6	Pass
111.0	H	22.6	1.8	090	43.5	-20.9	Pass
173.1	H	37.3	1.8	090	43.5	-6.2	Pass
225.0	H	27.4	1.6	045	46.0	-18.6	Pass
472.0	H	28.9	1.2	045	46.0	-17.1	Pass
665.0	H	27.9	1.2	090	46.0	-18.1	Pass
850.0	H	34.3	1.2	090	46.0	-11.7	Pass
56.9	V	35.5	1.1	180	39.1	-3.6	Pass
69.7	V	33.1	1.2	180	39.1	-6	Pass
74.0	V	33.3	1.2	090	39.1	-5.8	Pass
139.6	V	30.8	1.2	090	43.5	-12.7	Pass
250.0	V	20.9	1.1	090	46.0	-25.1	Pass
274.7	V	25	1.1	090	46.0	-21	Pass
292.0	V	27.7	1.1	270	46.0	-18.3	Pass
340.0	V	25.2	1.1	270	46.0	-20.8	Pass

\*Quasi-peak reading. For emissions that have peak values close to ( or over) the specification limit (if any) will be also measured in the quasi-peak or average mode to determine the compliance. No other significant emissions (comparing to Class A limit) are found in the rest frequency bands.

\*\* Radiated field Strength at 10m distance = Radiated field Strength at 3m distance - 10.5 dB $\mu$ V/m used for low level signals with high level ambient.

Test No.2

<b>Name of Test:</b>	<i>Marketing of UWB Equipment</i>	<b>Test Standard:</b>	<b>15.507 &amp;RSS-GEN</b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** 15.507/ 2.909

**Standard:** The responsible party is properly informed about the responsible for ensuring that the equipment is marketed only to eligible parties, and provide correct information on the customers and users.  
(See Important note for the US customers of the Installation Guide and User Manual)

**Method of Measurement:** In some cases, the operation of UWB devices is limited to specific parties, e.g., law enforcement, fire and rescue organizations operating under the auspices of a state or local government. The marketing of UWB devices must be directed solely to parties eligible to operate the equipment. The responsible party, as defined in Section 2.909 of this chapter, is responsible for ensuring that the equipment is marketed only to eligible parties. Marketing of the equipment in any other manner may be considered grounds for revocation of the grant of certification issued for the equipment.

**Test Result:** **Complies**

**Test Data:** **NA**

Test No.3

<b>Name of Test:</b>	<i>Pulse Repetition Frequency (PRF)</i>	<b>Test Standard:</b>	<i>15.509(d) &amp; RSS-220 6.2</i>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** Definition:  
Pulse Repetition Frequency (PRF) is the trigger repetition frequency.

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 30KHz  
VBW:  $\geq$ RBW  
Detector: Peak  
Span: As required  
Sweep: Auto

**Test Result:** **Complies**

**Test Data:** **N/A**

Test No.4

<b>Name of Test:</b>	<b><i>UWB Bandwidth</i></b>	<b>Test Standard:</b>	<b><i>15.509(a) 15.503(a) &amp;RSS-220 6.2.1(a)</i></b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:**

Definition:

The bandwidth of a UWB emission is defined by the points on the emission spectrum where the amplitude is 10 dB below the maximum emission amplitude (i.e., the -10 dB points), as based on the complete transmission system including the antenna. The upper boundary is designated  $f_H$  and the lower boundary is designated  $f_L$ . The frequency at which the highest radiated emission occurs is designated  $f_M$ . The center frequency  $f_C$  equals  $(f_H + f_L) / 2$ . The fractional bandwidth equals  $2 * (f_H - f_L) / (f_H + f_L)$ .

In cases where the measured emission spectrum contains multiple (more than two) -10 dB points, the outermost points define the bandwidth (i.e., the widest bandwidth is assumed).

Limits:

The UWB bandwidth of an imaging system operating under the provisions of this section must be below 10.6 GHz and meet the UWB signal BW requirements: BW is greater than 500MHz and/or fraction BW is greater than 0.2.

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 1MHz  
VBW: 3MHz  
Detector: Peak  
Span: As required ( to display a full spectrum of the RF emission)  
Sweep: Auto

**Test Procedure:**

- 1) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 2) Measure the Highest radiated emission at  $f_M$  as described in the test No. 9.
- 3) Recorded the upper and lower frequency that are at the side of the band bounded by the points at 10 dB below the highest radiated UWB emission level. Measuring the bandwidth of a UWB device using a radiated test set-up, it is imperative that appropriate adjustments be made to the measured amplitude levels to account for the frequency-dependent components of the measurement system (e.g., antenna gain or factor, pre-amplifier gain, cable loss, etc). Since UWB emissions can have bandwidths several GHz wide, these frequency-dependent characteristics can vary dramatically over the fundamental emission. According to the nature of the broadband emission characteristics, significant care must be taken to capture the true spectrum of emission, extremely narrow sweep widths is recommended.
- 4) The UWB bandwidth is the different of the upper and lower frequency recorded.

**Test Result:** **Complies**

**Test Data:** **Data and Plots**

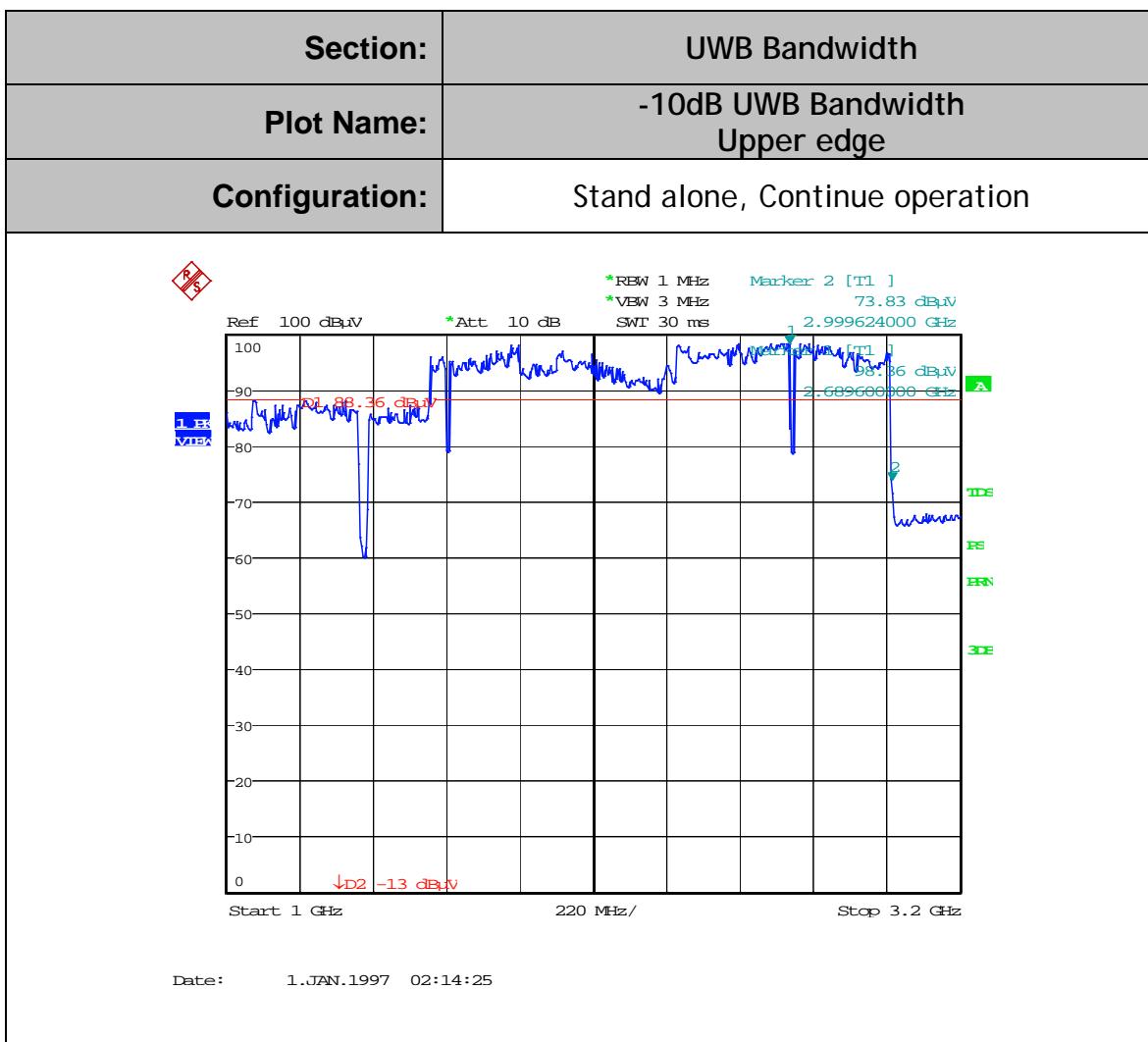
Measurement Data (Values in MHz):

$f_M$	The highest emission peak	2689.6
$f_H$	10 dB below the highest peak	2999.6
$f_L$	10 dB above the highest peak	627.2
$f_C$	Calculated: $(f_H + f_L)/2$	1813.8
Bandwidth	Calculated: $(f_H - f_L)$	2372.4
Fractional BW	Calculated: $2*(f_H - f_L)/(f_H + f_L)$	1.31

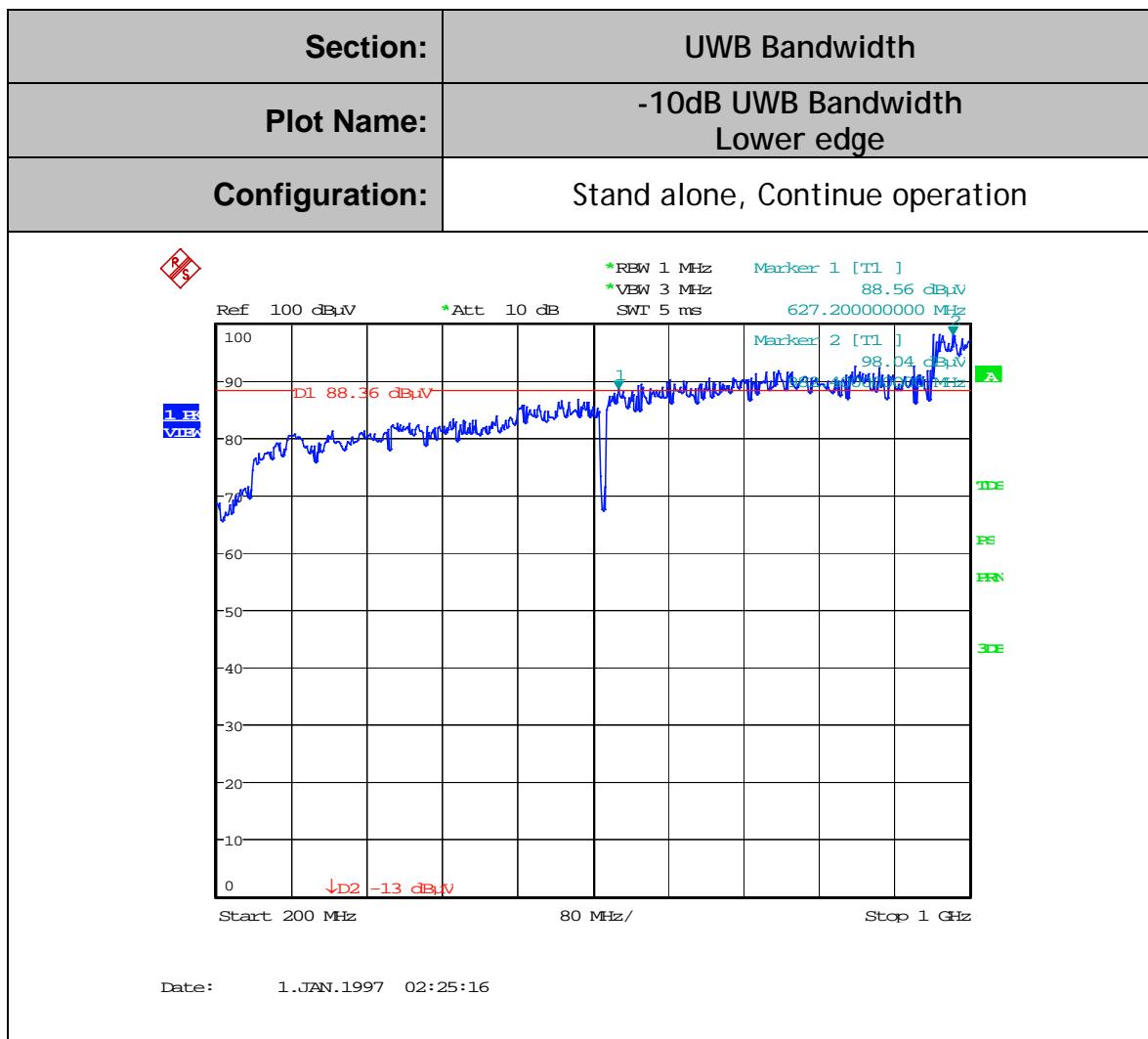
Note: The Fraction Bandwidth is greater than 0.2.

Measurement Plots:

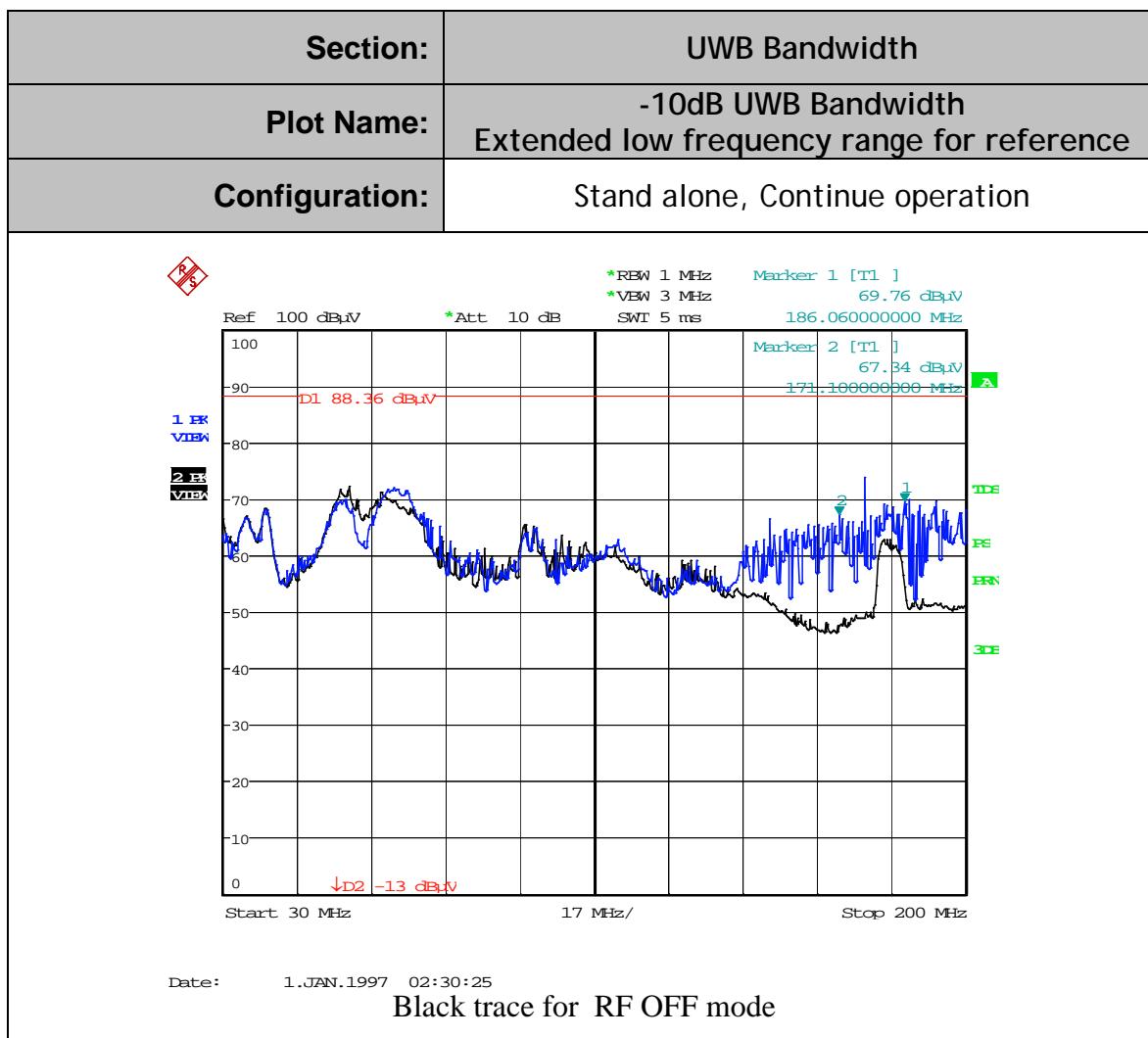
<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	Wei Li
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%



<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	166-53-05NA-E
<b>S/N:</b>	PT001
<b>Tested By:</b>	Wei Li
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%



<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	Wei Li
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%



Test No.5

<b>Name of Test:</b>	<i>General Operational Requirements for LFIS</i>	<b>Test Standard:</b>	<b>15.509(b) &amp;RSS-220 6</b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** 15.509(b) &RSS-220 6

Operation under the provisions of this section is limited to GPRs and wall imaging systems operated for the purposes with law enforcement, fire fighting, emergency rescue, scientific research, commercial mining, or construction.

**Method of Measurement:** The manufacturer Shall state that the device under test complies with the requirements outlined in section FCC Part 15.509 (b).

**Test Result:** **Complies**

**Test Data:** **NA**

Test No.6

<b>Name of Test:</b>	<i>Spurious Radiated Emissions <math>\leq 960\text{MHz}</math></i>	<b>Test Standard:</b>	<i>15.509(d) 15.209 &amp;RSS-220 3.4, 6.2(c), 6.2(d)</i>
<b>Tested By:</b>	David Tu	<b>Test Date:</b>	03/04/2024- 05/20/2024

**Minimum Standard:** Definition:

The radiated emissions at or below 960 MHz from a device operating under the provisions of this section shall not exceed the emission levels in Section 15.209.

Limits:

Frequency (MHz)	Field Strengths Limits (dB $\mu$ V/m)	Measuring kHz	RBW	Distance (meters)
0.009-0.490	67,6-20*Logf(kHz)	1	300	
0.490-1.705	87,6-20*Logf(kHz)	9	30	
1.705-30	29.5	9	30	
30-88	40.0	120	3	
88-216	43.5	120	3	
216-960	46.0	120	3	

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 120KHz  
VBW:  $\geq 3$  x RBW  
Detector: Quasi-Peak  
Span: As required  
Sweep: Auto

**Test Procedure:**

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to peak with a bandwidth of 120 kHz during monitoring the frequency range below 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded. At each of the frequencies were a field strength was recorded the final measurement was performed with a Quasi-Peak detector.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 was repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

**Test Result:** **Complies**

**Test Data:** **Data**

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

Worst Case Scenario: the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

**Mode: Normal**

- EUT Position (angle) : 45 ° interval.
- Antenna Polarization : Horizontal & Vertical; Antenna Height : 1-4m

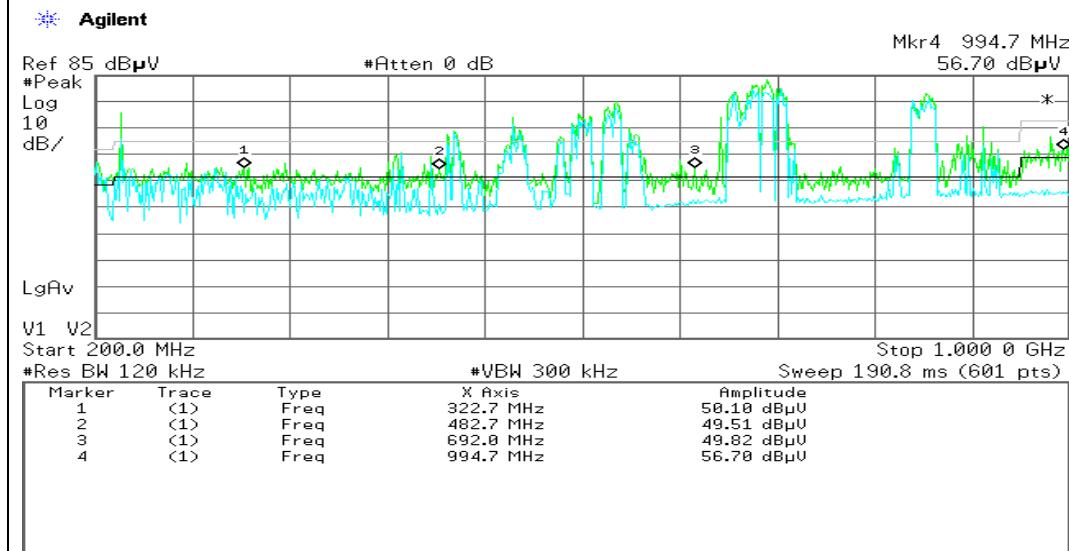
Freq.* (MHz)	H,V	SA QP Reading (dBuV/ m)	Height (m)	Angle (degree)	Refer to Part 15.209 3m Limit (dBuV/m)	Margin (dB)	Result
145.0	H	27.5	1.2	090	43.5	-16	Pass
162.9	H	31.5	1.1	090	43.5	-12	Pass
169.1	H	30.1	1.0	090	43.5	-13.4	Pass
194.9	H	29.2	1.0	270	43.5	-14.3	Pass
246.7	H	36.1	1.0	090	46.0	-9.9	Pass
274.7	H	37.1	1.0	090	46.0	-8.9	Pass
322.7	H	36.6	1.0	090	46.0	-9.4	Pass
482.7	H	36.0	1.0	270	46.0	-10.0	Pass
566.7	H	34.1	1.0	270	46.0	-11.9	Pass
692.0	H	36.3	1.0	090	46.0	-9.7	Pass
810.7	H	36.0	1.0	270	46.0	-10	Pass
837.3	H	42.9	1.0	090	46.0	-3.1	Pass
842.7	H	41.0	1.0	090	46.0	-5.0	Pass
962.7	H	42.9	1.0	270	54.0	-11.1	Pass
973.3	H	43.5	1.0	270	54.0	-10.5	Pass
984.0	H	47.9	1.0	090	54.0	-6.1	Pass
994.7	H	43.2	1.0	270	54.0	-10.8	Pass

145.0	V	35.4	1.1	000	43.5	-8.1	Pass
158.6	V	35.7	1.1	000	43.5	-7.8	Pass
177.9	V	38.7	1.1	180	43.5	-4.8	Pass
192.9	V	41.4	1.1	000	43.5	-2.1	Pass
206.7	V	42.4	1.1	000	43.5	-1.1	Pass
233.3	V	45.3	1.1	180	46.0	-0.7	Pass
329.3	V	44.1	1.1	180	46.0	-1.9	Pass
385.3	V	44.1	1.1	000	46.0	-1.9	Pass
422.7	V	44.7	1.1	000	46.0	-1.3	Pass
469.3	V	44.6	1.1	000	46.0	-1.4	Pass
521.3	V	42.2	1.1	180	46.0	-3.8	Pass
565.2	V	44.4	1.1	000	46.0	-1.6	Pass
658.7	V	43.3	1.1	180	46.0	-2.7	Pass
701.3	V	43.6	1.1	000	46.0	-2.4	Pass
788.0	V	42.9	1.1	000	46.0	-3.1	Pass
806.7	V	44.9	1.1	180	46.0	-1.1	Pass
829.3	V	43.7	1.1	000	46.0	-2.3	Pass
856.0	V	45.1	1.1	180	46.0	-0.9	Pass
896.9	V	45.0	1.1	180	46.0	-1.0	Pass
954.7	V	43.3	1.1	000	46.0	-2.7	Pass
974.7	V	50.4	1.1	000	54.0	-3.6	Pass
986.7	V	52.5	1.1	000	54.0	-1.5	Pass
996.0	V	51.2	1.1	000	54.0	-2.8	Pass

\*Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15 B) shall be excluded.

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

<b>Section:</b>	<i>Radiated Emissions Under 1GHz</i>
<b>Plot Name:</b>	Radiated Emissions worse case in certain angles ( Peak value for reference only)
<b>Configuration:</b>	Stand alone, Continue operation



Since the OATS measurement was conducted with manual position changes ( interval 45 degree). Only the worst points were collected from ambient noise. Not practical to provide all OFB spurious emission plots. This plot is for illustration purpose. The difference between QP and Average Reading is 13~15dB.

Test No.7

<b>Name of Test:</b>	<i>Spurious Radiated Emissions &gt;960MHz</i>	<b>Test Standard:</b>	<i>15.509(d) 15.209 &amp;RSS-220 3.4, 6.2(c), 6.2(d)</i>
<b>Tested By:</b>	David Tu	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** Definition:

**Standard:** The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz.

Limits:

Frequency (MHz)	EIRP @ 3 meters (1 MHz BW) (dBm)	Field strength @ 3 meters (1 MHz BW) (dB $\mu$ V/m)	Field strength @ 1 meters (1 MHz BW) (dB $\mu$ V/m)
960-1610	-65,3	29,9	39,4
1610-1990	-53,3	41,9	51,4
1990-3100	-51,3	43,9	53,4
3100-10600	-41,3	53,9	63,4
Above 10600	-51,3	43,9	53,9

Remark: The limits were converted from EIRP to field strength at 3 and 1 meter according to FCC 15.503(k).

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 1MHz  
VBW:  $\geq 3$  x RBW  
Detector: RMS Average Detector  
Span: As required  
Sweep: Auto

**Test Procedure:**

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna is placed at 1 meter away from the EUT and it is pointed in the direction of the radiating head with an inclination of -10° to find the highest emission. Multiple scan windows may be needed based on the antenna beamwidth and the size of EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to RMS with a bandwidth of 1 MHz during monitoring the frequency range above 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 were repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

**Test Result:** **Complies**

**Test Data:** **Data**

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

Worst Case Scenario: the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

- EUT Position (angle) : 45 ° interval.
- Antenna Polarization : Horizontal & Vertical; Antenna Height: 1m-4m.

### Normal Operation

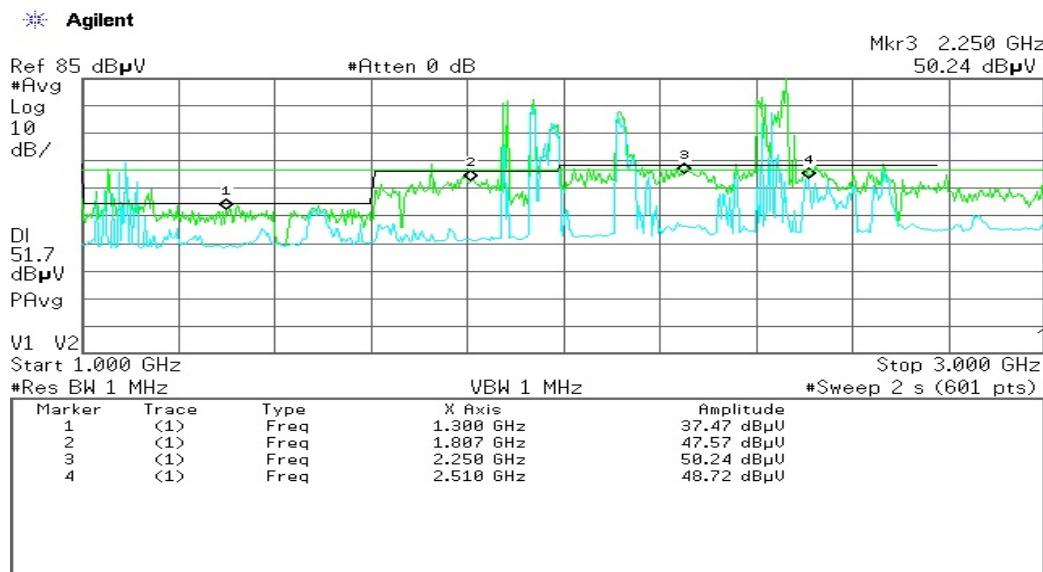
Freq.* (MHz)	H,V	SA Average Reading @1m (dBuV/m)	Height (m)	Angle (degree)	Refer to 15.509(d) 15.209 &RSS-220 3.4, 6.2(c), 6.2(d) Limit (dBuV/m)	Margin (dB)	Result
1313	H	29.4	1.0	090	39.4	-10.0	Pass
1857	H	36.3	1.0	270	51.4	-15.1	Pass
2250	H	45.2	1.0	270	53.4	-8.2	Pass
2783	H	42.8	1.0	270	53.4	-10.6	Pass
1023	V	37.7	1.0	000	39.4	-1.7	Pass
1073	V	34.6	1.0	000	39.4	-4.8	Pass
1163	V	34.5	1.0	000	39.4	-4.9	Pass
1243	V	35.9	1.0	000	39.4	-3.5	Pass
1300	V	37.5	1.0	000	39.4	-1.9	Pass
1397	V	36.3	1.0	000	39.4	-3.1	Pass
1433	V	36.4	1.0	180	39.4	-3.0	Pass
1517	V	37.2	1.0	180	39.4	-2.2	Pass
1550	V	37.1	1.0	000	39.4	-2.3	Pass
1633	V	43.5	1.0	000	51.4	-7.9	Pass
1703	V	47.5	1.0	045	51.4	-3.9	Pass
1807	V	47.6	1.0	045	51.4	-3.8	Pass
1910	V	43.0	1.0	000	51.4	-8.4	Pass
2023	V	52.0	1.0	000	53.4	-1.4	Pass

2053	V	51.9	1.0	000	53.4	-1.5	Pass
2250	V	50.2	1.0	180	53.4	-3.2	Pass
2383	V	51.3	1.0	180	53.4	-2.1	Pass
2510	V	48.7	1.0	000	53.4	-4.7	Pass
2740	V	47.3	1.0	000	53.4	-6.1	Pass
2793	V	49.7	1.0	000	53.4	-3.7	Pass
2867	V	44.4	1.0	000	53.4	-9.0	Pass
2903	V	45.1	1.0	000	53.4	-8.3	Pass
2947	V	43.0	1.0	000	53.4	-10.4	Pass

\*Emissions from Digital circuitry (identified in Test No.1 for FCC Part 15 B) shall be excluded.

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

<b>Section:</b>	<i>Radiated Emissions above 1GHz</i>
<b>Plot Name:</b>	Radiated Emissions worse case in certain angles ( reference only)
<b>Configuration:</b>	Stand alone, Continue operation



Since the OATS measurement was conducted with manual position changes ( interval 45 degree). Only the worst points were collected from ambient noise. Not practical to provide all OFB spurious emission plots. This plot is for illustration purpose.

Test No.8

<b>Name of Test:</b>	<i>Radiated Emissions in GPS Bands</i>	<b>Test Standard:</b>	<i>15.509(e) 15.209 &amp; RSS-220 6.2(e)</i>
<b>Tested By:</b>	David Tu	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:**

**Definition:**  
In addition to the radiated emission limits specified for frequency above 960 MHz, UWB transmitters operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of no less than 1 kHz in the GPS frequency bands.

**Limits:**

Frequency (MHz)	EIRP @ 3 meters (1 MHz BW) (dBm)	Field strength @ 3 meters (1 MHz BW) (dB $\mu$ V/m)	Field strength @ 1 meter (1 MHz BW) (dB $\mu$ V/m)
1164-1240	-75.3	19.9	29.4
1559-1610	-75.3	19.9	29.4

**Remark:** The limits were converted from EIRP to field strength at 3 and 1 meter according to FCC 15.503(k).

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 1KHz  
VBW: >3xRBW  
Detector: RMS Average Detector  
Span: As required  
Sweep: Auto

Test Procedure:

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position)
- 2) The receiving antenna is placed at 1 meter away from the EUT and it is pointed in the direction of the radiating head with an inclination of -10° to find the highest emission. Multiple scan windows may be needed based on the antenna beamwidth and the size of EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to RMS during monitoring the frequency range above 960 MHz.
- 5) Upon detection of a suspect emission signal, its amplitude and frequency were noted.
- 6) It is recommended to demodulate the received signals for suitable discrimination of the ambient emission from the EUT emission.
- 7) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 8) The receiving antenna was positioned in vertical polarization and the steps 2 to 6 were repeated.
- 9) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 10) All the worst case combination field strength emissions founded of each EUT position and antenna polarization was recorded in the following table and compared with the applicable limits.

**Test Result:** **Complies**

**Test Data:** **Data and Plot**

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

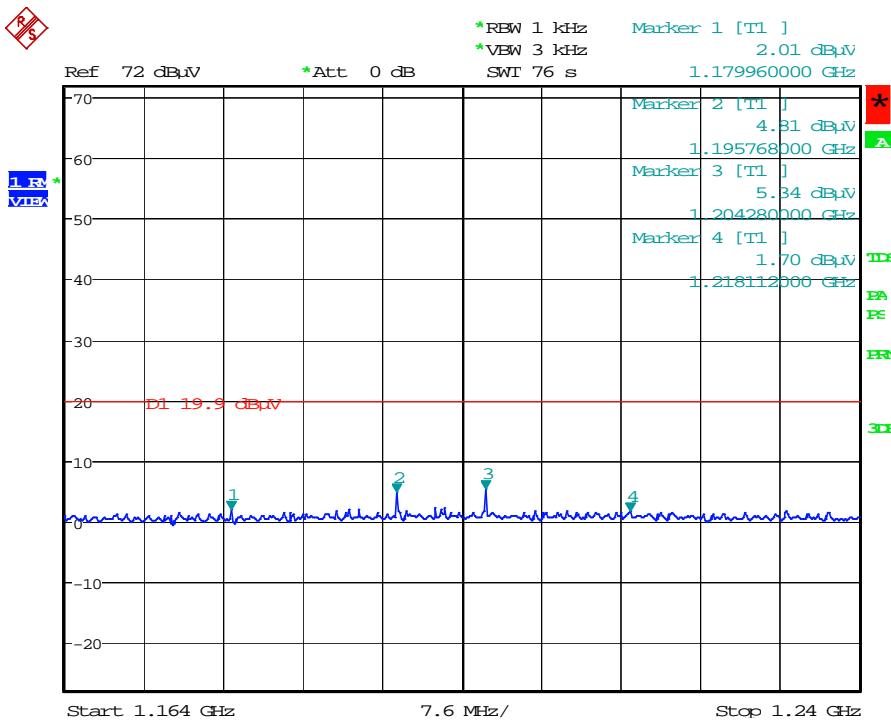
Worst Case Scenario: All maximum Field strength emissions were found at the following test set-up conditions:

Freq. (MHz)	H,V	SA Reading (dBuV/m)	Height (m)	Angle (degree)	1m Limit (dBuV/m)	Margin (dB)	Result
1180.0	H	2.01	1.1	045	29.4	-27.39	Pass
1195.8	H	4.81	1.1	045	29.4	-24.59	Pass
1204.3	H	5.34	1.1	045	29.4	-24.06	Pass
1218.1	H	1.70	1.1	045	29.4	-27.70	Pass
1613.1	H	5.65	1.1	045	29.4	-23.75	Pass
1619.1	H	5.70	1.1	045	29.4	-23.70	Pass
1624.9	H	6.25	1.1	045	29.4	-23.15	Pass
1629.0	H	5.86	1.1	045	29.4	-23.54	Pass
1180.0	V	2.95	1.1	000	29.4	-26.45	Pass
1200.0	V	3.52	1.1	000	29.4	-25.88	Pass
1211.0	V	3.78	1.1	000	29.4	-25.62	Pass
1223.0	V	4.61	1.1	000	29.4	-24.79	Pass
1611.0	V	9.83	1.1	000	29.4	-19.57	Pass
1617.0	V	9.69	1.1	000	29.4	-19.71	Pass
1629.0	V	10.13	1.1	000	29.4	-19.27	Pass
1637.0	V	9.83	1.1	000	29.4	-19.57	Pass

\* Measured signals were narrowband and related to the microprocessor / clocks and do not fall under the requirements of this section.

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65 °F
<b>Humidity:</b>	30%

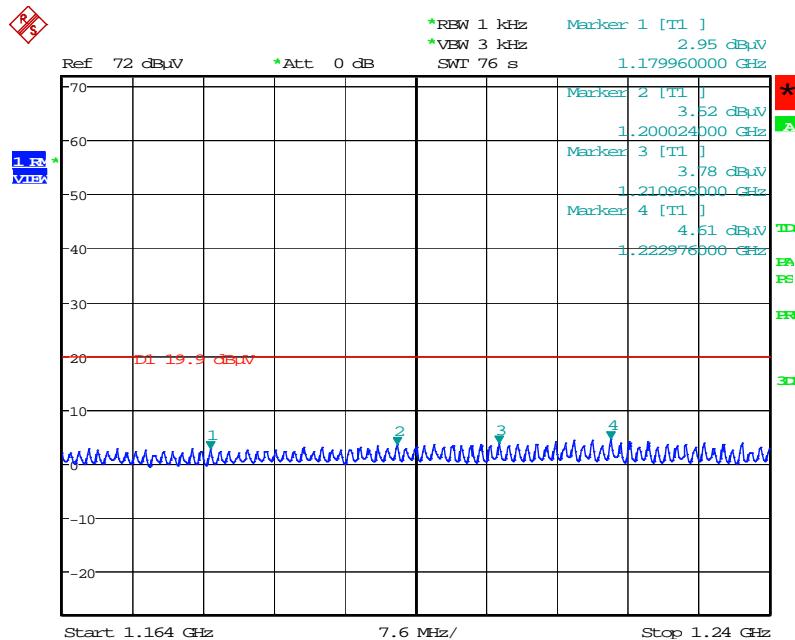
<b>Section:</b>	<i>Radiated Emissions in GPS Bands</i>
<b>Plot Name:</b>	Radiated Emissions in 1164-1240MHz Band H Polarity
<b>Configuration:</b>	Stand alone, Continue operation



Date: 1.JAN.1997 01:45:34

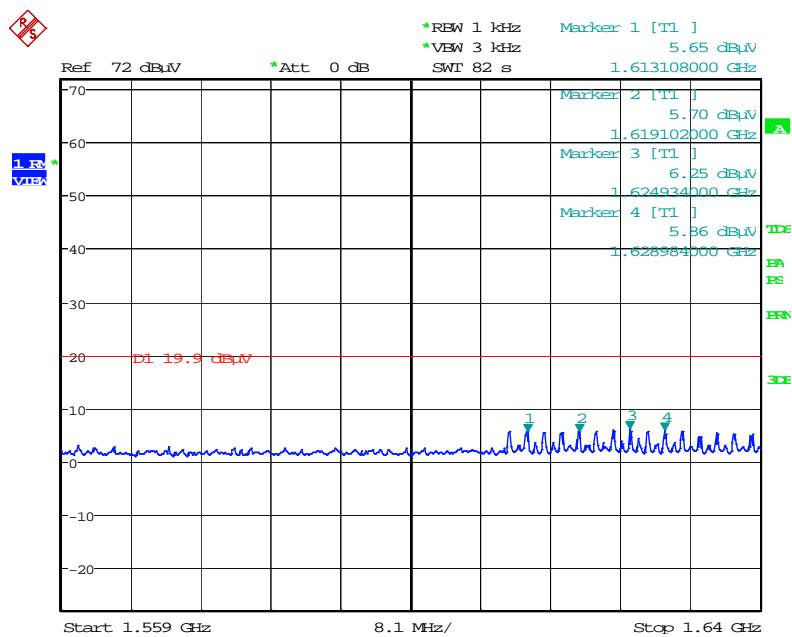
<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

<b>Section:</b>	<i>Radiated Emissions in GPS Bands</i>
<b>Plot Name:</b>	Radiated Emissions in 1164-1240MHz Band V Polarity
<b>Configuration:</b>	Stand alone, Continue operation



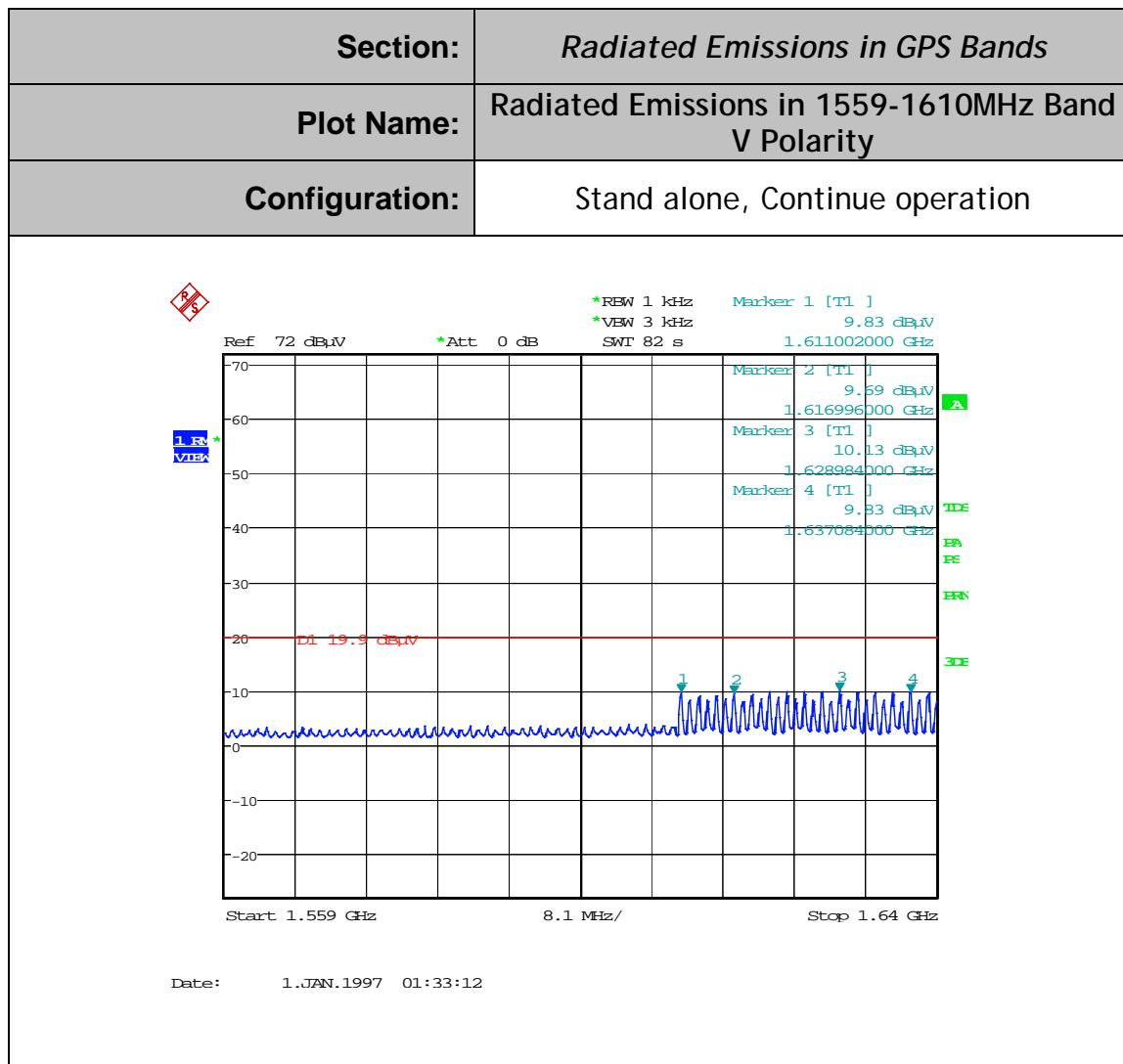
<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

<b>Section:</b>	<i>Radiated Emissions in GPS Bands</i>
<b>Plot Name:</b>	Radiated Emissions in 1559-1610MHz Band H Polarity
<b>Configuration:</b>	Stand alone, Continue operation



Date: 1.JAN.1997 01:39:57

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%



Test No.9

<b>Name of Test:</b>	<i>Highest Radiated Emission at f</i>	<b>Test Standard:</b>	<i>15.509(f) 15.209 &amp;RSS-220 6.2(g)</i>
<b>Tested By:</b>	David Tu	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** Definition:

For UWB devices where the frequency at which the highest radiated emission occurs,  $f_M$ , is above 960 MHz, there is a limit on the peak level of the emissions contained within a 50 MHz bandwidth centered on  $f_M$ .

Limits:

The peak emission level contained within a 50 MHz bandwidth centered on  $f_M$  must be limited to a maximum of 0 dBm EIRP.

EIRP limit (dBm)	Field strength limit @ 3 meters for 50MHz RBW (dB $\mu$ V/m)	Field strength limit @ 3 meters (measured with 3 MHz RBW) (dB $\mu$ V/m)
0	95.2	70.8

The limits were converted from EIRP to field strength at 3 meter according to FCC 15.503(k).

As the measurement was employed with a 3 MHz resolution bandwidth the applicable limit is adjusted with a  $20\log(3/50)$  dB factor (-24.4dB).

So the EIRP limit is -24.4 dBm.

With 3m measurement conversion relation:  $E=95.2+P$ , the field strength limit is 70.8 dB $\mu$ V/m.

**Method of Measurement:** Tested at 3-meter OATS per ANSI C63.4  
Spectrum Analyzer Settings:  
RBW: 3MHz  
VBW:  $\geq 3$  x RBW  
Detector: Peak  
Span: As required  
Sweep: Auto

Test Procedure:

- 1) The EUT was placed on sandpit area filled with dry sand initially placed in front of the ground plane (0° degree position).
- 2) The receiving antenna which varied from 1 to 4 m to find the highest emission is positioned 3 m away from the EUT.
- 3) The receiving antenna was positioned in horizontal polarization.
- 4) The measurements were made with the detector set to peak with a bandwidth of 3 MHz during monitoring the frequency range inside the UWB of the EUT.
- 5) At the worst case combination of the EUT operating mode and antenna height, the field strength measure was recorded.
- 6) The receiving antenna was positioned in vertical polarization and the steps 4 to 6 were repeated.
- 7) The EUT was rotating from 0° to 360° degrees with 45° step increment and the steps 4 to 7 was repeated.
- 8) Record the peak emission from the EUT.

**Test Result:** **Complies**

**Test Data:**

<b>Project Number:</b>	0048-240304-01-FCC-IC
<b>EUT:</b>	GROUND 1820
<b>S/N:</b>	23002
<b>Tested By:</b>	David Tu
<b>Temperature:</b>	65°F
<b>Humidity:</b>	30%

**Worst Case Scenario:** The maximum peak level of emission is found at the following test set-up conditions:

Applicable to Normal Mode:

Freq. (MHz)	H,V	SA Peak Reading At 3 meter (dBuV/m)	RBW	Reading correction	Limit (dBuV/m)	Margin (dB)	Result
2250	V	66.7	3MHz	0	70.8	-4.1	Pass

Test No.10

<b>Name of Test:</b>	<b>Technical Requirements Applicable to ALL UWB Devices</b>	<b>Test Standard:</b>	<b>15.521</b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	03/04/2024-05/20/2024

<b>Requirement</b>	<b>Description</b>
15.521(a)	The EUT is not employed for the operation of toys, operation onboard an aircraft, ship and satellite.
15.521(b)	Permanent attached antenna, no External radio frequency power amplifiers and antenna modifications are permitted.
15.521(c)	The Digital circuitry portion of the EUT has been tested and verified to comply with 47 CFR Part 15, subpart B.
15.521(d)	Considered
15.521(e)	The $f_m$ , frequency at which the highest radiated emission occurs is contained within the measured UWB bandwidth.
15.521(f)	The EUT is not intended to detection of tags or the transfer or data or voice information.
15.521(g)	Considered
15.521(h)	Considered
15.521(i)	Prohibition in Sections 2.201(f) and 15.5(d) of this chapter against Class B (damped wave) emissions is not applied.
15.521(j)	Battery operating device not connected to AC power lines.
15.521(a)	The EUT is not employed for the operation of toys, operation onboard an aircraft, ship and satellite.

**Test Result:**

**Complies**

**Test Data:**

**NA**

Test No.11

<b>Name of Test:</b>	<i>Coordination Requirement</i>	<b>Test Standard:</b>	<b>15.525</b>
<b>Tested By:</b>	Wei Li	<b>Test Date:</b>	03/04/2024-05/20/2024

**Minimum Standard:** The responsible party is properly informed about the required coordination requirement and provide correct information to the customers and users about their specific care and legislative obligations.

(See Important note for the US customers of the Installation Guide and User Manual)

**Method of Measurement:**

- (a) UWB imaging systems require coordination through the FCC before the equipment may be used. The operator shall comply with any constraints on equipment usage resulting from this coordination.
- (b) The users of UWB imaging devices shall supply operational areas to the FCC Office of Engineering and Technology, which shall coordinate this information with the Federal Government through the National Telecommunications and Information Administration.
- (c) The manufacturers, or their authorized sales agents, must inform purchasers and users of their systems of the requirement to undertake detailed coordination of operational areas with the FCC prior to the equipment being operated.
- (d) Users of authorized, coordinated UWB systems may transfer them to other qualified users and to different locations upon coordination of change of ownership or location to the FCC and coordination with existing authorized operations.
- (e) The FCC/NTIA coordination report shall identify those geographical areas within which the operation of an imaging system requires additional coordination or within which the operation of an imaging system is prohibited.
- (f) The coordination of routine UWB operations shall not take longer than 15 business days from the receipt of the coordination request by NTIA.

**Test Result:**

**Test Data:** **NA**

Test No. 12

<b>Name of Test:</b>	<i>Antenna Requirement</i>	<b>Test Standard:</b>	<b><i>15.203&amp;15.204 &amp;RSS-GEN 7.1.4</i></b>
<b>Tested By:</b>	WEI LI	<b>Test Date:</b>	

**Minimum Standard:** An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply.

**Method of Measurement:** The antenna utilized by the device under test is an internal, non user replaceable unit.

**Test Result:** **Complied with using an internal, non user replaceable Antenna**

**Test Data:** **NA**

Test No.13

Name of Test:	Radio Frequency Exposure	Test Standard:	FCC OET Bulletin 65 &RSS-GEN
Tested By:	WEI LI	Test Date:	03/04/2024-05/20/2024

**Minimum Standard:** *For FCC:*  
 Public Exposure to Radio Frequency Energy Levels (1.1307 (b)(1))  
 Limits:

From §1.1310 Table 1 (B),  
 for Public  $S = 1.0 \text{ mW/cm}^2$   
 for Professional,  $S = 5.0 \text{ mW/cm}^2$

**Method of Measurement:**

$d = 0.282 * 10 ^ ((P + G) / 20) / \sqrt{S}$	Equation (1)
$S = 0.0795 * 10 ^ ((P + G)/10) / d^2$	Equation (2)

where

$d$  = MPE distance in cm  
 $P$  = Power in dBm  
 $G$  = Antenna Gain in dBi  
 $S$  = Power Density Limit in  $\text{mW/cm}^2$

Equation (1) and the measured peak power is used to calculate the MPE distance.

Equation (2) and the measured peak power is used to calculate the Power density.

*For IC:*

Per RSS-102 Section 2.5.2.

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

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

**Test Result:**

**Complies**

**Test Data:**

**NA**

### LIMITS for FCC RF Exposure Evaluation

§1.1310 The criteria listed in Table 1 shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of §2.1093 of this chapter.

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm <sup>2</sup> )	Averaging time (minutes)
<b>(A) Limits for Occupational/Controlled Exposures</b>				
0.3–3.0	614	1.63	*(100)	6
3.0–30	1842/f	4.89/f	*(900/f <sup>2</sup> )	6
30–300	61.4	0.163	1.0	6
300–1500	.....	.....	f/300	6
1500–100,000	.....	.....	5	6
<b>(B) Limits for General Population/Uncontrolled Exposure</b>				
0.3–1.34	614	1.63	*(100)	30
1.34–30	824/f	2.19/f	*(180/f <sup>2</sup> )	30

TABLE 1—LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)—Continued

Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm <sup>2</sup> )	Averaging time (minutes)
30–300	27.5	0.073	0.2	30
300–1500	.....	.....	f/1500	30
1500–100,000	.....	.....	1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

NOTE 1 TO TABLE 1: Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

NOTE 2 TO TABLE 1: General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or can not exercise control over their exposure.

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

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

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

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

### CALCULATIONS for MPE distance and Power Density

Given

$$E = \sqrt{(30 * P * G) / d}$$

and

$$S = E^2 / 3770$$

where

E = Field Strength in Volts/meter

P = Power in Watts

G = Numeric

antenna gain

d = Distance in  
meters

S = Power Density in milliwatts/square centimeter

Combining equations and rearranging the terms to express the distance as a function of the remaining variables yields:

$$d = \sqrt{(30 * P * G) / (3770 * S)}$$

Changing to units of Power to mW and Distance to

cm, using:  $P(\text{mW}) = P(\text{W}) / 1000$  and

$$d(\text{cm}) = 100 * d(\text{m})$$

yields

$$d = 100 * \sqrt{(30 * (P / 1000) * G) / (3770 * S)}$$

$$d = 0.282 * \sqrt{(P * G / S)}$$

where

d = distance in cm

P = Power in mW

G = Numeric antenna gain

S = Power Density in mW/cm<sup>2</sup>

Substituting the logarithmic form of power and

gain using:  $P(\text{mW}) = 10^{(P(\text{dBm}) / 10)}$  and

$$G(\text{numeric}) = 10^{(G(\text{dBi}) / 10)}$$

yields

$$d = 0.282 * 10^{((P + G) / 20) / \sqrt{S}} \quad \text{Equation (1)}$$

$$S = 0.0795 * 10^{((P + G) / 10) / d^2} \quad \text{Equation (2)}$$

where

d = MPE distance in cm

P = Power in dBm

G = Antenna Gain in dBi

S = Power Density Limit in mW/cm<sup>2</sup>

Equation (1) and the measured Output power is used to calculate the MPE distance.  
Equation (2) and the measured Output power is used to calculate the Power density.

### APPLICABLE LIMITS

**RF Exposure for separation >= 20cm**

FCC: From §1.1310 Table 1 (B), for Public  $S = 1.0 \text{ mW/cm}^2$ ; for Professional,  $S = 5.0 \text{ mW/cm}^2$   
IC: With formula of  $1.31 \times 10^{-2} f^{0.6834} \text{ W}$ , more restricted EIRP limit value are 1.37W at 902MHz, 2.67W at 2400MHz.

## RESULTS

No non-compliance noted.

### For GPR UWB Transmitter only:

#### 1-mW Test Exemption:

Per § 1.1307(b)(3)(i)(A), a single RF source is exempt RF device (from the requirement to show data demonstrating compliance to RF exposure limits, as previously mentioned) if the available maximum time-averaged power is no more than 1 mW, regardless of separation distance. This exemption applies to all operating configurations and exposure conditions, for the frequency range 100 kHz to 100 GHz, regardless of fixed, mobile, or portable device exposure conditions.

For this EUT, max emission level is under the 0dBm limit set in Part 15F. No RF hazard need to be concerned.

The max. power density can be obtain by using the max.  $P+G=-19.7 \text{ dBm}$  and  $d=20 \text{ cm}$ , and plug all three items into equation (2), yielding,

Power Density Limit (mW/cm <sup>2</sup> )	Max. Output Power+Antenna] Gain (dBm)	Calculated Power Density (mW/cm <sup>2</sup> )
1.0/5.0	0	2E-6

Test No.14

<b>Name of Test:</b>	<i>Conducted Emissions</i>	<b>Test Standard:</b>	<b>15.507 &amp;RSS-GEN</b>
<b>Tested By:</b>	-	<b>Test Date:</b>	-

**Minimum Standard:** 15.507 &RSS-GEN

Limit

<b>Frequency Range (MHz)</b>	<b>Limits (dB<math>\mu</math>V)</b>	
	<b>Quasi-Peak</b>	<b>Average</b>
0.15 to 0.50	66 to 56*	56 to 46*
0.50 to 5.0	56	46
5.0 to 30.0	60	50

\* Decreases with the logarithm of the frequency.

**Method of Measurement:** Test measurements were made in accordance with ANSI C63.4-2003, Standard Methods of Measurement of Radio Noise Emissions from Low-Voltage Electrical and Electronics Equipment in the Range of 9 kHz to 40 GHz.

Spectrum Analyzer Setting:  
Frequency Range: 150KHz to 30MHz  
RBW: 9KHz  
VBW: 30KHz  
Detector: Peak/QP/Average

**Test Result:** **NA**  
(The EUT is only powered via a lithium-ion battery which is remotely recharged)

**Test Data:** **NA**

Test No.15

<b>Name of Test:</b>	<i>Transmission Duration</i>	<b>Test Standard:</b>	<i>15.509(c)&amp; 15.519(a)(1)</i>
<b>Tested By:</b>	-	<b>Test Date:</b>	-

**Minimum Standard:** 15.509 (c)

**Standard:** A GPR that is designed to be operated while being hand held and a wall imaging system shall contain a manually operated switch that causes the transmitter to cease operation within 10 seconds of being released by the operator. In lieu of a switch located on the imaging system, it is permissible to operate an imaging system by remote control provided the imaging system ceases transmission within 10 seconds of the remote switch being released by the operator.

15.519(a)(1)---for hand held UWB Systems

A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.

**Method of Measurement:** Functional Check

**Test Result:** **N/A**

**Test Data:** **N/A**