

REGULATORY COMPLIANCE REPORT

TITLE: FCC & IC Test Report for 15.231(a) & RSS-210 Annex 1, Momentary Operated Devices

900 BCR Radio

AUTHOR: W. Raymond Stoner

REV	CCO	DESCRIPTION OF CHANGE	DATE	APPROVALS	
001		INITIAL RELEASE		Engineering	
				Regulatory	

REVISION HISTORY

A		original	02dec09	Engineering	
				Regulatory	
B		answer first non-conforms: go to 15.231(a) from (e) threw out; SMA polarity; add variation of Supply Voltage;; add test on timing, removed annex's B&D (wavier and prof. installation)	16dec09	Engineering	
				Regulatory	
C		answers to second round: power out of voltage, periodic triggers,	17dec	Engineering	
				Regulatory	

NOTICE OF PROPRIETARY INFORMATION

Information contained herein is proprietary and is property of **ITRON, Inc.** where furnished with a proposal, the recipient shall use it solely to evaluate the proposal. Where furnished to a customer it shall be used solely for the purposes of inspection, installation or maintenance. Where furnished to a supplier, it shall be used solely in the performance of work contracted for this company. The information shall not be used or disclosed by the recipient for any other purpose, whatsoever.

Test Data Summary**FCC 15.231(a) / IC RSS-210 Annex1; Momentary Operated Devices Transmitter;**

900 BCR Radio, 952 – 953 MHz for EUT

FCC ID: EO9BCR900**IC: 864D-BCR900****IC Device Models (for IC): 900 BCR Radio****Part Numbers: 900 BCR Radio****Serial Numbers – see below**

OATS Registration Number: FCC 90716, IC 864D-1

Rule	Description	Spec Limit	Max. Reading	Pass/Fail
Part 15.203	Antenna Requirement	see below	n/a	Pass
Part 15.31(e)	Variation of Input Voltage – Conducted	n/a	12.2V	Pass
Part 15.207 / RSS-Gen 7.2.2	AC Power line Conducted Emissions	46 dB μ V/m	36.5 dB μ V/m	Pass
Part 15.231(a) / RSS-210 A1.1.1 (b)	Periodic timing	5 seconds	5 seconds	Pass
Part 15.231(b) / RSS-210 A1.1.2	Transmitter Field Strength Limits - radiated	12,500 / 1,250 uV/m @ 3m	1646 μ V/m 116.6 μ V/m	Pass
Part 15.231(c)	20dB Bandwidth – conducted	<0.5% of the center frequency	1.551 MHz	Pass
RSS 210 A1.1.3	99% Bandwidth – conducted	<0.5% of the center frequency	1.476 MHz	Pass

Rule versions: FCC Part 1 (01-2006), FCC Part 2 (01-2006), FCC Part 15 (05-04-2007), RSS-102 Issue 2 (11-2005), RSS-210 Issue 7 (June 2007), RSS-Gen Issue 2 (06-2007).

Reference docs: ANSI C63.4-2003, DA 00-705 (03-30-2000), OET65 (08-1997), OET65C (06-2001), IEEE C95.3-2002.

Cognizant Personnel	
<u>Name</u> W. Raymond Stoner	<u>Title</u> Engineer
<u>Name</u> Jay Holcomb	<u>Title</u> Regulatory Manager
<u>Name</u> Drew Rosenberg	<u>Title</u> Project Lead

CONDITIONS DURING TESTING

No Modifications to the EUT were necessary during the testing.

FCC 15.31(m) – IC _n/a_ ; Number of Channels

This device was tested on one channel.

FCC 15.203 – IC _n/a_ ; Antenna Connector Requirements for detachable antennas

The antenna is removable and has a unique Reverse polarity SMA connector; therefore the EUT complies with these FCC rules.

ANSI C63.4 - Temperature and Humidity During Testing

The temperature during testing was within +10° C and +40° C.

The Relative humidity was between 10% and 90%.

RSS-Gen 4.3: Tests shall be performed at ambient temperature

EQUIPMENT UNDER TEST (EUT) DESCRIPTION

Itron declares that the EUT tested was representative of a production unit.

EQUIPMENT UNDER TEST**EUT Module**

Manuf: Itron, Inc.
Model: **900 BCR Radio**
Serial Number(s) Listed Below
Power source Belt clip charging cradle

Plot Information

In the zero span measurements, the line in the display is the trigger level.

Peripheral Devices

The EUT was tested with the following peripheral devices:

12VDC Power Supply

Manuf: CUI Inc.
Model: DSA-0421S-121
Serial: NA

Charging Cradle

Manuf: Itron Inc
Model: NA
Serial: NA

AC Adapter for PC

Manuf: Lite-On Technology Corporation
Model: LA90PSO-00
Serial: CN-ODF266-71615-65O-202C

Laptop PC

Manuf: Dell Inc
Model: PP18L
Serial: 21216189133

15.31(e)**Variation of Supply Voltage**

For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage. For battery operated equipment, the equipment tests shall be performed using a new battery.

Vary the supply voltage from 85% to 115% of the nominal voltage. If the power level of the fundamental signal varies with supply voltage, record the voltage level at which the fundamental signal is at its highest and use that voltage level for all further testing.

Equipment Used	Serial Number	Cal Date	Due
Fluke 83 Multimeter	48000153	3/09	3/10
Kikasui AC power supply PCR500L	BL005456	3/09	3/10
Date	Tested by		
12/11/09	W. Raymond Stoner		

Unit tested: 67400139

Line Voltage	UUT input voltage
102	12.2
120	12.2
138	12.2

There was no change in output power level seen over the voltage variation.

15.207 / RSS-GEN 7.2.2**Power line Conducted Emissions**

Measure the AC power line conducted emissions from 150kHz to 30 MHz using a 50uH/50 ohm line impedance stabilization network (LISN) according to the procedure specified in ANSI C63.4. Verify that no emissions exceed the following limits:

Frequency (MHz)	Quasi-Peak (dB μ V)	Average (dB μ V)
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

*Decreases with the logarithm of frequency

Equipment Used	Serial Number	Cal Date	Due
Agilent SA E4407B	MY45107856	3/09	3/11
Emco-3810/2 LISN	00026824	4/09	4/10
Agilent Transient limiter 11947A	3107A03963	3/09	3/10
Date	Tested by		
11/02/09	W. Raymond Stoner		

Unit tested: 67400139

1	2	3	4	5	6	7	8
		Peak	Transient		Corrected		
Frequency		Level	limiter	LISN	Value	Spec	Margin
MHz	Polarity	dB μ V/m	dB	dB	dB μ V/m	dB μ V/m	dB
0.962	Black	25.4	10	0	35.4	46	-10.6
2.319	White	25.4	10	0.1	35.5	46	-10.5
3.641	White	25.5	10	0.1	35.6	46	-10.4
3.901	Black	26.3	10	0.2	36.5	46	-9.5
4.011	White	25.2	10	0.2	35.4	46	-10.6
4.135	Black	25.7	10	0.2	35.9	46	-10.1
4.194	Black	25.2	10	0.2	35.4	46	-10.6
4.39	White	26.3	10	0.2	36.5	46	-9.5
4.454	Black	25.7	10	0.2	35.9	46	-10.1
4.59	Black	26	10	0.2	36.2	46	-9.8

3+4+5=6

6-7=8

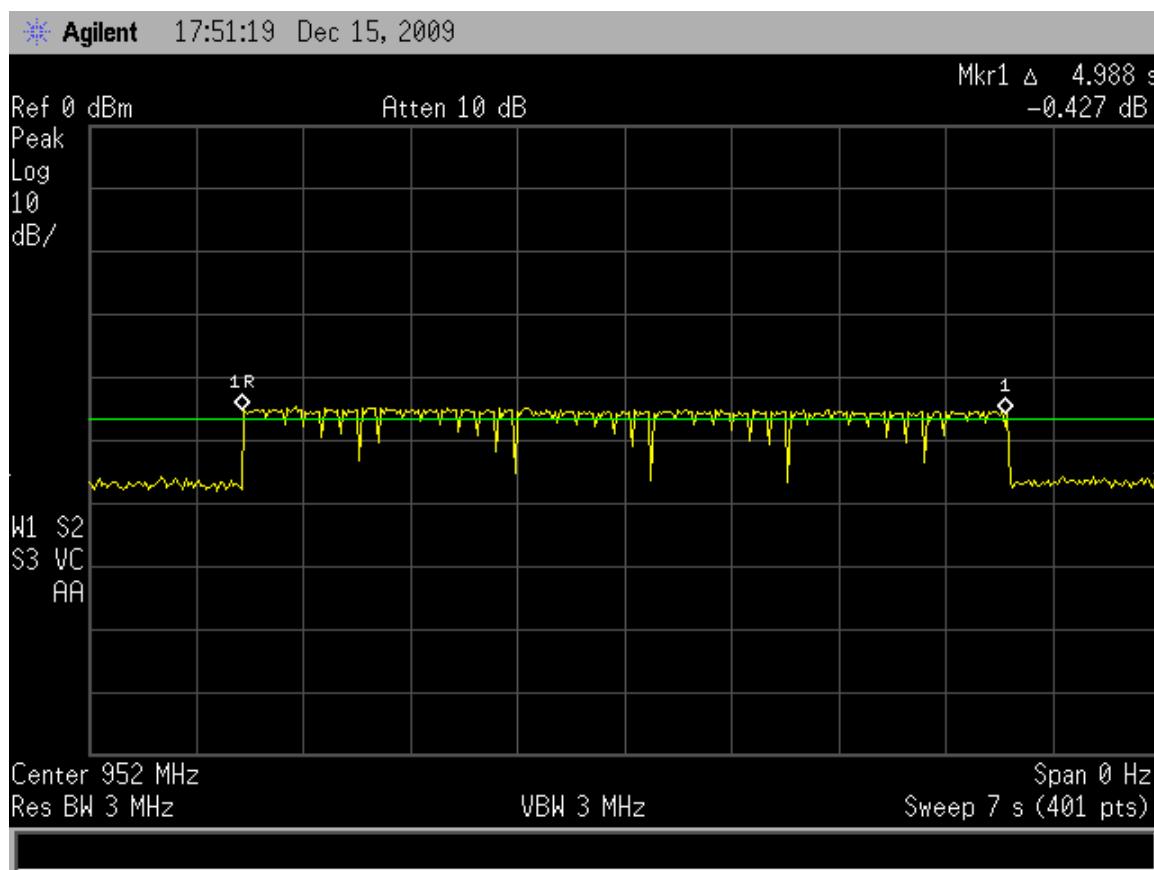
15.231(a) (1) & (2) / RSS-210 A1.1.1 (b)**Periodic Operation - conducted**

(a) The provisions of this section are restricted to periodic operation within the band 40.66-40.70 MHz and above 70 MHz. Except as shown in paragraph (e) of this section, the intentional radiator is restricted to the transmission of a control signal such as those used with alarm systems, door openers, remote switches, etc. Continuous transmissions, voice, video and the radio control of toys are not permitted. Data is permitted to be sent with a control signal. The following conditions shall be met to comply with the provisions for this periodic operation:

- (1) A manually operated transmitter shall employ a switch that will automatically deactivate the transmitter within not more than 5 seconds of being released.
- (2) A transmitter activated automatically shall cease transmission within 5 seconds after activation.

Equipment Used	Serial Number	Cal Date	Due
Agilent SA E4407B	MY45107856	3/09	3/11
Date	Tested by		
12/16/09	W. Raymond Stoner		

Unit tested: 67400139



This plot is the longest message that is sent.

The programming sequence is initiated by keyboard or receiving device, then the transmission is triggered automatically.

15.231(b) / RSS-210 A1.1.2**Transmitter Field Strength Limits - radiated**

(b) In addition to the provisions of §15.205, the field strength of emissions from intentional radiators operated under this section shall not exceed the following:

Emission Limits

Frequency (MHz)	Field Strength (microvolts/meter)	in dBuV/m	Measurement Distance (meters)*	maximum Peak +20 over Avg limit dBuV/m
Fundamental	12,500	81.93	3	101.93
Spurious emissions	1,250	61.93	3	81.93

$$FS \text{ (dBuV/m)} = 20 * \log (FS(\mu V/m))$$

Measure the field strength of all transmitter emissions according to the procedure in appendix A.

Equipment Used	Serial Number	Cal Date	Due
AH systems preamplifier model PAM 0126	135	12/08	12/09
H/S Sucoflex 40ft cable	220297001	12/07	12/09
Agilent E7405A Spectrum Analyzer	MY45113415	7/09	7/10
Emco 6502 Loop (9kHz to 30Mhz)	9509-2970	10/08	10/10
Emco 3110B Biconical (30MHz-to 300MHz)	9807-3129	10/09	10/11
Emco 3148 Log Periodic (200Mhz to 1GHz)	9901-1044	10/09	10/11
Emco 3115 wave guide (1GHz-18GHz)	9205-3878	3/08	3/10
Date	Tested by		
11/11/09	Mark Kvamme		

Measure the field strength of all transmitter emissions according to the procedure in appendix A. The maximum field strength of emissions may not exceed above.:

Unit tested: 67400138

For emissions measurements below 30MHz, rotate the loop antenna about its horizontal and vertical positions to maximize emissions.

1	2	3	4	5	6	7	8	9	10	11	12	13
'							VBW \geq			10Hz VBW		
		VBW \geq	10Hz VBW				RBW					
			RBW				Peak			Average*		
	Ant.	Peak	Average	Cable	Ant.	Amplifier	Corrected	Peak	Peak	Corrected	Average	Average
Freq.	vert or	Level	Level	Loss	Factor	Gain	Level	Limit	Margin	Level	Limit	Margin
MHz	horz.	dBuV/m	dBuV/m	dB	dB/m	dB	dBuV/m	dBuV/m	dB	dBuV/m	dBuV/m	dB
952	Vert	62.29	33.03	2.7	28.6	0	93.59	101.93	-8.34	64.33	81.93	-17.6

$$[8] = [3]+[5]+[6]+[7];$$

$$[11] = [4]+[5]+[6]+[7];$$

$$20 * \log (\text{FS}(\text{uV/m})) ; 64.33 \text{ dBuV/m} = 1646 \text{ uV/m}$$

$$[9] \text{ from table above;}$$

$$[12] \text{ from table above;}$$

$$[10] = [8] - [9]$$

$$[13] = [12] - [11]$$

$$\text{FS (dBuV/m)} =$$

note1: If peak is below average limit, average does not need to be reported

Harmonics

		VBW \geq	10Hz VBW				RBW					
		RBW					Peak			Average*		
	Ant.	Peak	Average	Cable	Ant.	Amplifier	Corrected	Peak	Peak	Corrected	Average	Average
Freq.	vert or	Level	Level	Loss	Factor	Gain	Level	Limit	Margin	Level	Limit	Margin
MHz	horz.	dBuV/m	dBuV/m	dB	dB/m	dB	dBuV/m	dBuV/m	dB	dBuV/m	dBuV/m	dB
1904	vert	60.46	44.81	4.51	26.94	-35.48	56.43	81.93	-25.5	40.78	61.93	-21.15
1904	horz	59.95	45.37	4.51	26.94	-35.48	55.92	81.93	-26.01	41.34	61.93	-20.59
2856	horz	57.97	38.63	5.42	29.81	-35.14	58.06	81.93	-23.87	38.72	61.93	-23.21
2856	vert	57.06	38.01	5.42	29.81	-35.14	57.15	81.93	-24.78	38.1	61.93	-23.83
3808	vert	37.77	na	6.15	32.18	-34.73	41.37	81.93	-40.56	na	61.93	-20.56
3808	horz	38.84	na	6.15	32.18	-34.73	42.44	81.93	-39.49	na	61.93	-19.49
4760	vert	38.24	na	7	32.66	-35.12	42.78	81.93	-39.15	na	61.93	-19.15
4760	horz	37.63	na	7	32.66	-35.12	42.17	81.93	-39.76	na	61.93	-19.76
5712	vert	37.71	na	7.43	34.28	-35.56	43.86	81.93	-38.07	na	61.93	-18.07
5712	horz	37.35	na	7.43	34.28	-35.56	43.5	81.93	-38.43	na	61.93	-18.43
6664	vert	36.08	na	8.23	34.76	-35.29	43.78	81.93	-38.15	na	61.93	-18.15
6664	horz	36.66	na	8.23	34.76	-35.29	44.36	81.93	-37.57	na	61.93	-17.57
7616	vert	37.62	na	8.75	36.57	-34.91	48.03	81.93	-33.9	na	61.93	-13.9
7616	horz	36.8	na	8.75	36.57	-34.91	47.21	81.93	-34.72	na	61.93	-14.72

$$[8] = [3]+[5]+[6]+[7];$$

$$[11] = [4]+[5]+[6]+[7];$$

$$[9] \text{ from table above; } [10] = [8] - [9]$$

$$[12] \text{ from table above; } [13] = [12] - [11]$$

$$\text{FS (dBuV/m)} = 20 * \log (\text{FS}(\text{uV/m})) ; 41.34 \text{ dBuV/m} = 116.6 \text{ uV/m}$$

note1: If peak is below average limit, average does not need to be reported

15.231(c)**20dB Bandwidth - conducted**

(c) The bandwidth of the emission shall be no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz. For devices operating above 900 MHz, the emission shall be no wider than 0.5% of the center frequency. Bandwidth is determined at the points 20 dB down from the modulated carrier.

Measure the 20dB bandwidth and verify it does not exceed 0.5% of the center frequency

Use the following spectrum analyzer settings:

Span = approximately 2 to 3 times the 20 dB bandwidth, centered on a channel.

RBW \geq 1% of the 20 dB bandwidth

VBW \geq RBW

Sweep = auto

Detector function = peak

Trace = max hold

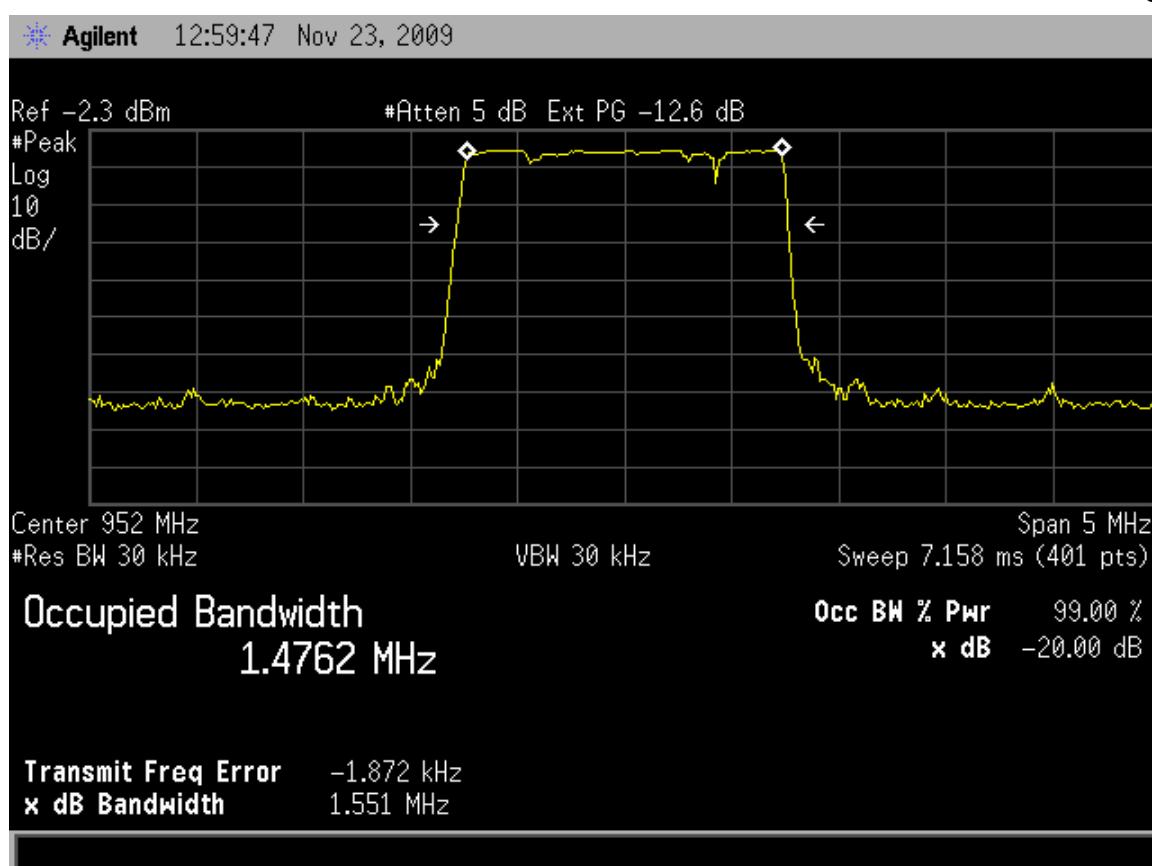
The EUT should be transmitting at its maximum data rate. Allow the trace to stabilize. Use the marker-to-peak function to set the marker to the peak of the emission. Use the marker-delta function to measure 20 dB down one side of the emission. Reset the marker-delta function, and move the marker to the other side of the emission, until it is (as close as possible to) even with the reference marker level. The marker-delta reading at this point is the 20 dB bandwidth of the emission. If this value varies with different modes of operation (e.g., data rate, modulation format, etc.), repeat this test for each variation. The limit is specified in one of the subparagraphs of this Section. Submit this plot(s).

Equipment Used	Serial Number	Cal Date	Cal Due
HP 4407B	MY45107856	3/09	3/11
Date	Tested by		
11/23/09	W. Raymond Stoner		

Unit tested: 67400139

Due to configuration limitations of the bandwidth measurement screen in the spectrum analyzer Occupied bandwidth is listed at the top of the screen. The 20 db bandwidth measurement is located near the bottom left of the screen capture

Frequency, MHz	total BW, MHz
952	1.551



RSS 210 A1.1.3 (RSS GEN 4.6.1)**99% Bandwidth - conducted**

The transmitter shall be operated at its maximum carrier power measured under normal test conditions. The span of the analyzer shall be set to capture all products of the modulation process, including the emission skirts. The resolution bandwidth shall be set to as close to 1% of the selected span as is possible without being below 1%. The video bandwidth shall be set to 3 times the resolution bandwidth. Video averaging is not permitted. Where practical, a sampling detector shall be used since a peak or, peak hold, may produce a wider bandwidth than actual. The trace data points are recovered and are directly summed in linear terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached and that frequency recorded. The process is repeated for the highest frequency data points. This frequency is recorded.

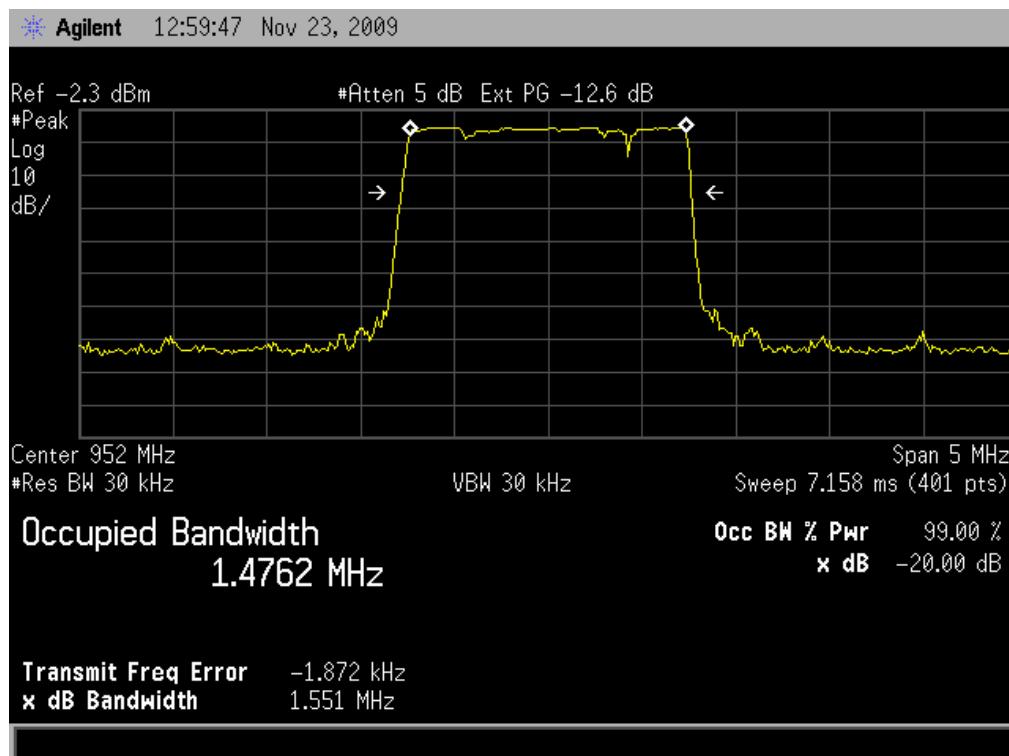
The span between the two recorded frequencies is the occupied bandwidth.

Capture a plot of the 99% bandwidth of a single transmission.

Equipment Used	Serial Number	Cal Date	Cal Due
HP 4407B	MY45107856	3/09	3/11
Date	Tested by		
11/23/09	W. Raymond Stoner		

Unit tested: 67400139

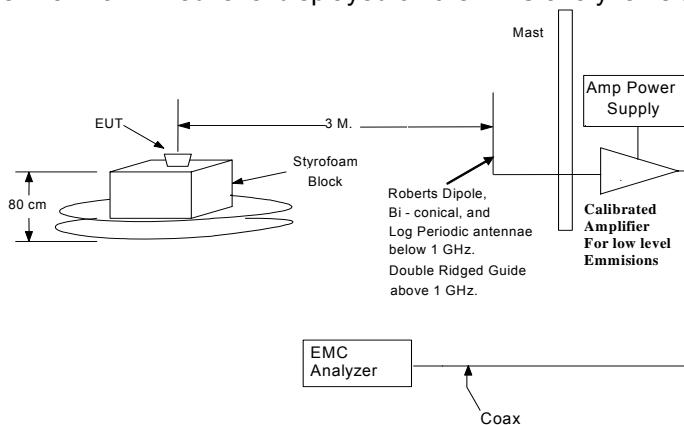
Frequency, MHz	total BW, MHz
952	1.476



ANNEX AField Strength Measurement Procedure

This test measures the field strength of radiated emissions using a spectrum analyzer and a receiving antenna in accordance with ANSI C63.4-2003. During the test, the EUT is to be placed on a non-conducting support at 80 cm above the horizontal ground plane of the OATS. The horizontal distance between the antenna and the EUT is to be 3 meters. The bandwidths used shall be; 200 Hz from 9 kHz to 150 kHz, 9 kHz from 150 kHz to 30 MHz, 120 kHz from 30 MHz to 1000 MHz, and 1 MHz from 1 GHz to 40 GHz, with the detector set to peak hold.

- 1) The antenna correction factor, preamplifier gain (if the preamplifier is installed), and cable loss may be stored in tables in the EMC analyzer and the level at the analyzer is then the corrected level in dbuV/m. Otherwise it is calculated externally.
- 2) Monitor the frequency range of interest at a fixed antenna height and EUT azimuth.
- 3) If appropriate, manipulate the system cables to produce the highest amplitude signal relative to the limit. Note the amplitude and frequency of the suspect signal.
- 4) Rotate the EUT 360° to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, go back to the azimuth and repeat step 3). Otherwise, orient the EUT azimuth to repeat the highest amplitude observation and proceed.
- 5) Move the antenna over its fully allowed range of travel to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, return to step 3) with the antenna fixed at this height. Otherwise, move the antenna to the height that repeats the highest amplitude observation and proceed.
- 6) Change the polarity of the antenna and repeat step 3), step 4), and step 5). Compare the resulting suspected highest amplitude signal with that found for the other polarity. Select and note the higher of the two signals.
- 7) The final maximized level displayed on the EMC analyzer is the field strength.



ANNEX B

Several of the FCC / IC rules that are referenced.

Section 15.247(b) (3): For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

1997 FCC Decisions, Amendment of Parts 2 and 15. 7 CR 534, 12 FCC Rcd 7488, 62 FR 26239, 1997 FCC LEXIS 1927. FCC 917-114 Report and Order, Released: April 10, 1997:

Section 15.247(c): Spurious emissions. The following tests are required:

(1) RF antenna conducted test: Set RBW = 100 kHz, Video bandwidth (VBW) > RBW, scan up through 10th harmonic. All harmonics/spurs must be at least 20 dB down from the highest emission level within the authorized band as measured with a 100 kHz RBW.

(2) Radiated emission test: Applies to harmonics/spurs that fall in the restricted bands listed in Section 15.205. The maximum permitted average field strength is listed in Section 15.209. A pre-amp (and possibly a high-pass filter) is necessary for this measurement. For measurements above 1 GHz, set RBW = 1 MHz, VBW = 10 Hz, Sweep: Auto. If the emission is pulsed, modify the unit for continuous operation, use the settings shown above, then correct the reading by subtracting the peak-average correction factor, derived from the appropriate duty cycle calculation. See Section 15.35(b) and (c).

§15.33 Frequency range of radiated measurements.

(a) For an intentional radiator, the spectrum shall be investigated from the lowest radio frequency signal generated in the device, without going below 9 kHz, up to at least the frequency shown in this paragraph:

(1) If the intentional radiator operates below 10 GHz: to the tenth harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Section 15.33 (b) - Frequency range of radiated measurements. For unintentional radiators: see part. (9kHz or lowest generated to 5GHz or 5th harmonic)

Section 15.35 Measurement detector functions and bandwidths. - The conducted and radiated emission limits shown in this part are based on the following, unless otherwise specified elsewhere in this part:

(a) ... (a) does not apply to this report

(b) Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz. When average radiated emission measurements are specified in this part, including average emission measurements below 1000 MHz, there also is a limit on the peak level of the radio frequency emissions. Unless otherwise specified, e.g., see §§15.250, 15.252, 15.255, and 15.509-15.519, the limit on peak radio frequency emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test. This peak limit applies to the total peak emission level radiated by the device, e.g., the total peak power level. Note that the use of a pulse desensitization correction factor may be needed to determine the total peak emission level. The instruction manual or application note for the measurement instrument should be consulted for determining pulse desensitization factors, as necessary.

(c) Unless otherwise specified, e.g. §15.255(b), when the radiated emission limits are expressed in terms of the average value of the emission, and pulsed operation is employed, the measurement field strength shall be determined by averaging over one complete pulse train, including blanking intervals, as long as the pulse train does not exceed 0.1 seconds. As an alternative (provided the transmitter operates for longer than 0.1 seconds) or in cases where the pulse train exceeds 0.1 seconds, the measured field strength shall be determined from the average absolute voltage during a 0.1 second interval during which the field strength is at its maximum value. The exact method of calculating the average field strength shall be submitted with any application for certification or shall be retained in the measurement data file for equipment subject to Declaration of Conformity or verification.

RSS-GEN 4.9 Transmitter Unwanted Emissions:

The search for unwanted emissions shall be from the lowest frequency internally generated or used in the device (local oscillator, intermediate or carrier frequency), or from 30 MHz, whichever is the lower, to the 5th harmonic of the highest frequency generated without exceeding 40 GHz.