

# REGULATORY COMPLIANCE REPORT

**TITLE:** FCC & IC Test Report for 15.247 & RSS-210 Frequency Hopping Device

**900 BCR Radio**

**AUTHOR:** William Stoner

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

## REVISION HISTORY

A		first filing	02dec09	Engineering	
				Regulatory	
B		answer first non conforms. clarity on SMA connector, power line conducted, spurious emissions, MPE, etc.	11dec09	Engineering	
				Regulatory	
C		answers to second round: power out of voltage.	17dec	Engineering	
				Regulatory	

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**Test Data Summary**
**FCC 15.247 / IC RSS-210; Frequency Hopping Transmitter;**
**900 BCR Radio 908 – 923.8 MHz**
**FCC ID: EO9BCR900**
**IC: 864D-BCR900**

IC Device Models (for IC): **900 BCR Radio**

Part Numbers: BCR-0900-001

Serial Numbers – see below

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

Rule	Description	Spec Limit	Max. Reading	Pass/Fail
Part 15.247 (a)(1)	System Receivers	see below	Match this device	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	table	36.5 dBµV/m	Pass
Part 15.247(a)(1)(i) / RSS-210 A8.1(c)	Number of Hopping Channels – conducted	=> 50	80	Pass
Part 15.247(a)(1)(i) / RSS 210 8.1 (a)	20dB Bandwidth – conducted	< 250kHz	141.244KHz	Pass
Part 15.247(a)(1) / RSS-210 A8.1(b)	Carrier Frequency Separation – conducted	> 20dB BW	200KHz	Pass
Part 15.247(a)(1)(i);(g); (h) / RSS-210 A8.1(c)	Time of Occupancy, Short Burst, Intelligence	< 400mS in 20sec	109.65 mS	Pass
Part 15.247(b) (2) / RSS-210 A8.4(1)	Power Output – conducted	< 1.0W	0.0106	Pass
Part 15.247(d) / RSS-210 A8.5	Spurious Emissions – conducted	> 20dBc	-29.16 dBc	Pass
Parts 15.205 & 15.209 / RSS-210 2.2, 2.6 Tables 1 & 2	Restricted Bands / Spurious Emissions – radiated	table	53.25 dBuV/m	Pass
RSS-Gen 7.2.3	Receiver Spurious Emissions - radiated	table	41.12 dBuV/m	Pass
Parts 1.1310 & 2.1093 (portable) and KDB447498 / RSS-102 Sec 4.2	RF Safety	< 60/F(GHz)	SAR Evaluation Performed	exempt
15.247 (d)	Band-edge compliance of RF Conducted Emissions	same as spurious	-56.4 dBc	Pass

Rule versions: FCC Part 1; FCC Part 2; FCC Part 15, 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 three channels.

### **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:	<b>900 BCR Radio</b>
Serial Number(s)	Listed In individual tests
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

### 15.247(a)(1)

#### System receivers

... .. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals

**THIS DEVICE IS OPERATED IN SYSTEMS THAT THE READING DEVICES, HAVE INPUT BANDWIDTHS THAT MATCH THIS DEVICE AND THAT STAY IN SYNCHRONIZATION.**

### 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 50 $\mu$ H/50 $\Omega$  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 $\square$ V)	Average (dB $\square$ 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		
3 November 2009	W. Raymond Stoner		

Unit tested: 67400139

1	2	3	4	5	6	7	8
Frequency		Peak	Transient		Corrected		
MHz	Polarity	Level	limiter	LISN	Value	Spec	Margin
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

$$3+4+5=6$$

$$6-7=8$$

### 15.247(a) (1) (i) / RSS-210 A8.1 (c)

#### **Number of Hopping Channels, conducted**

*For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies.*

The EUT must have its hopping function enabled. Use the following spectrum analyzer settings:

Span = the frequency band of operation

RBW  $\geq$  1% of the span

VBW  $\geq$  RBW

Sweep = auto

Detector function = Peak

Trace = max hold

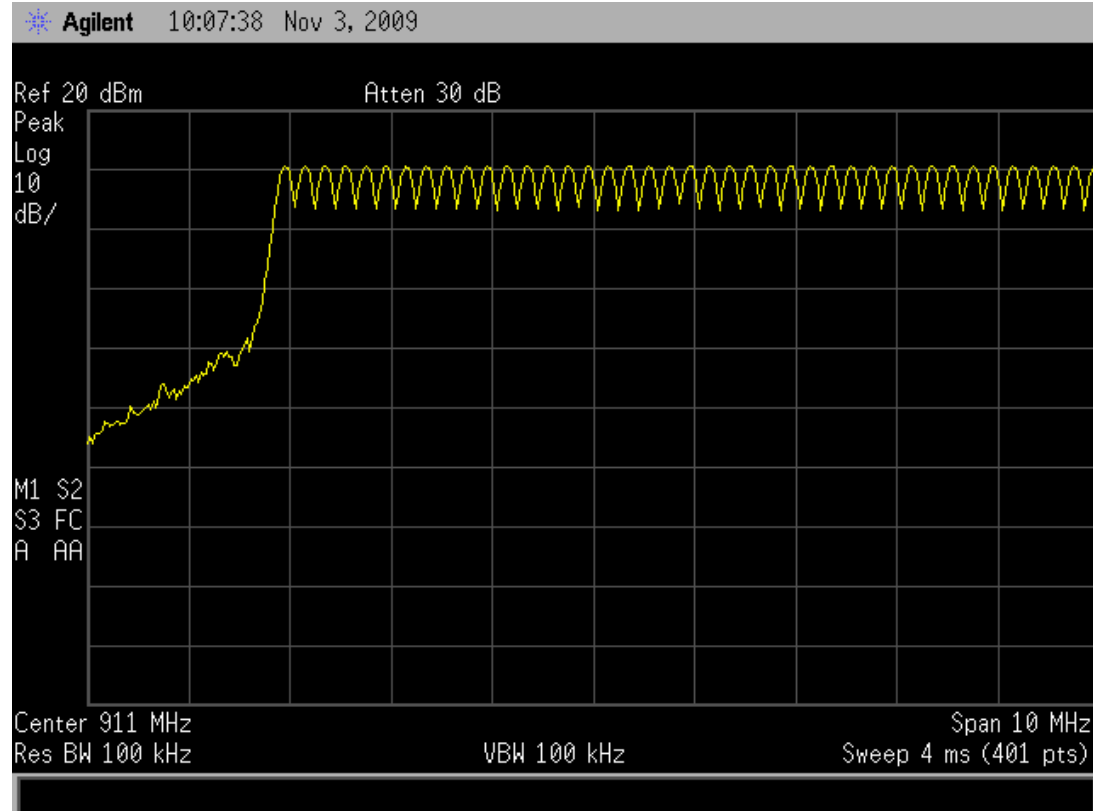
Allow the trace to stabilize. It may prove necessary to break the span up into sections, in order to clearly show all of the hopping frequencies. The limit is specified in one of the subparagraphs of this Section. Submit this plot(s).

Equipment Used	Serial Number	Cal Date	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
3 November 2009	W. Raymond Stoner		

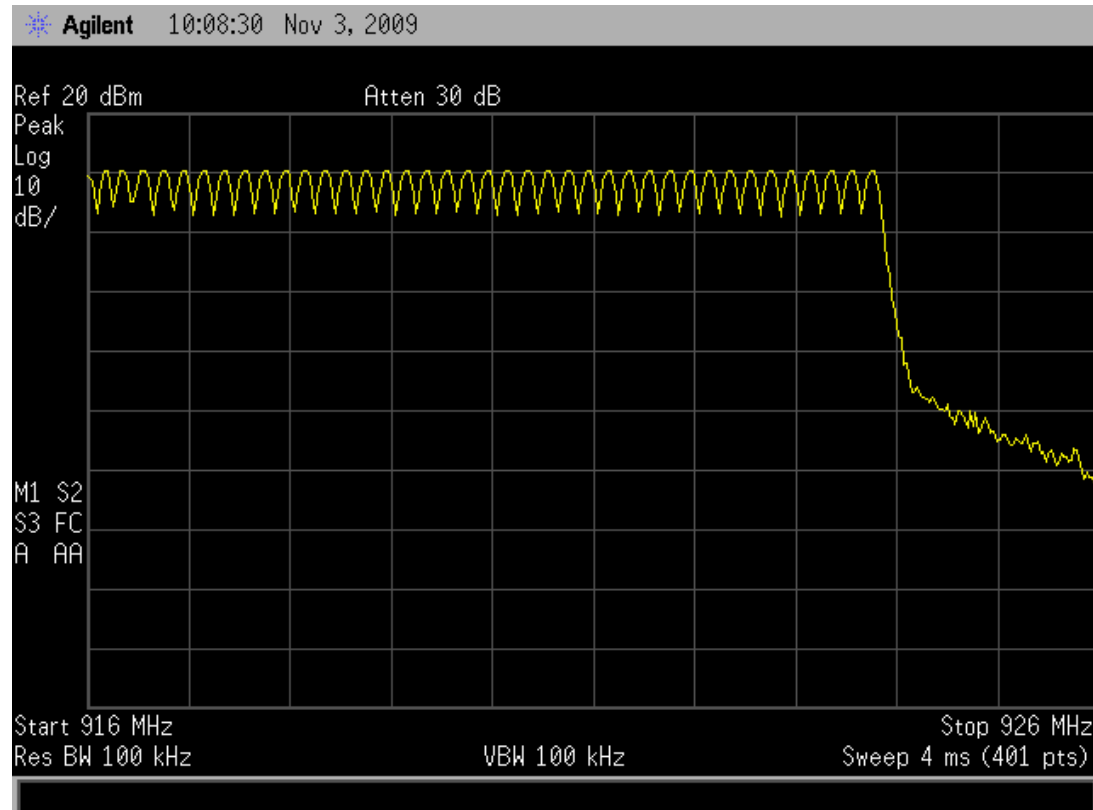
Unit tested: 67400139

There are 80 channels.

# Channels from 902 MHz to 916MHz



# Channels from 916 MHz to 928 MHz



# 15.247(a) (1) (i) / RSS-210 A8.1 (a)

## 20 dB Bandwidth, Conducted

(i) For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies ... ..

Verify that the 20 dB bandwidth of the hopping channel is less than 250 kHz.

Use the following spectrum analyzer settings:

Span = approximately 2 to 3 times the 20 dB bandwidth, centered on a hopping 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 mission, 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	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
28 October 2009	W. Raymond Stoner		

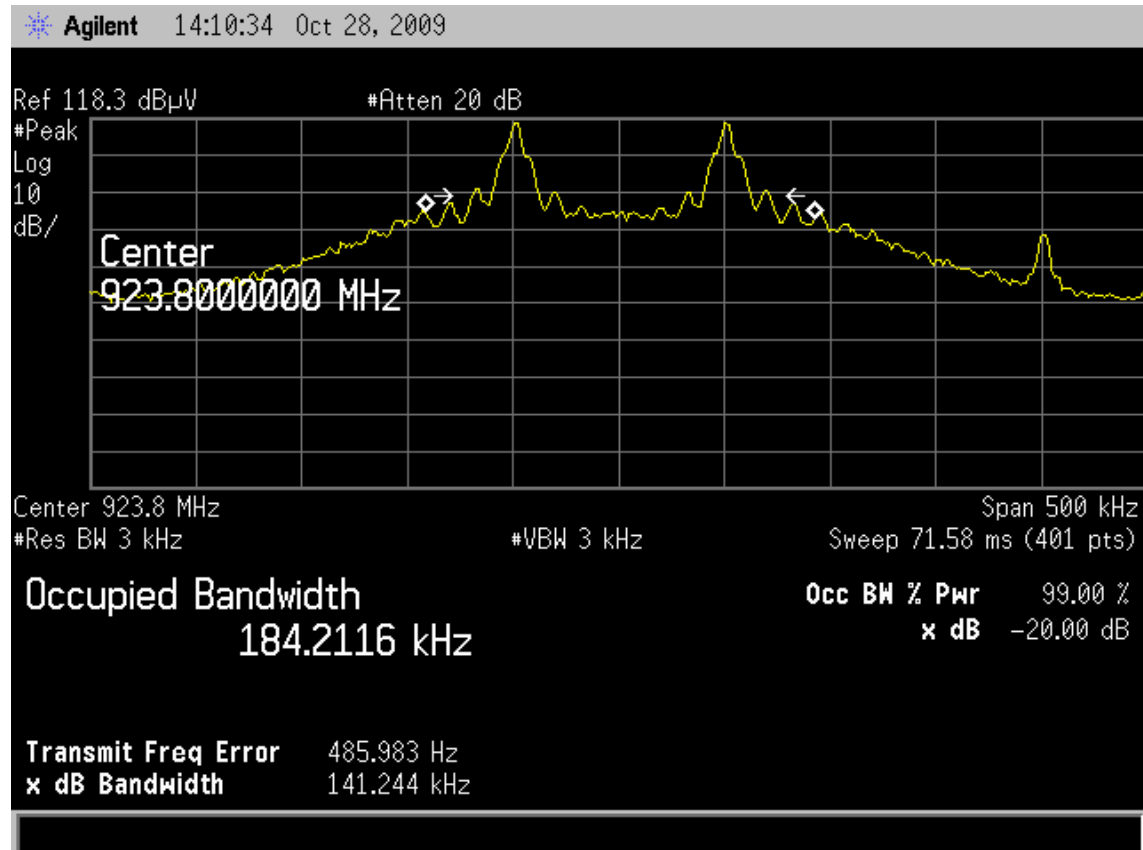
Unit tested: 67400139

Frequency, MHz	total BW, kHz
908	140.699
916	140.499
923.8	141.244

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. Loss in the cable is 1.1db. This loss was entered as an external gain of 1.1db.







### 15.247(a) (1) / RSS-210 A8.1 (b)

#### Carrier Frequency Separation, conducted

Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater.

Verify that the channel separation is > the 20dB bandwidth of a single transmission.

The EUT must have its hopping function enabled. Use the following analyzer settings:

RBW  $\geq$  1% of the span

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

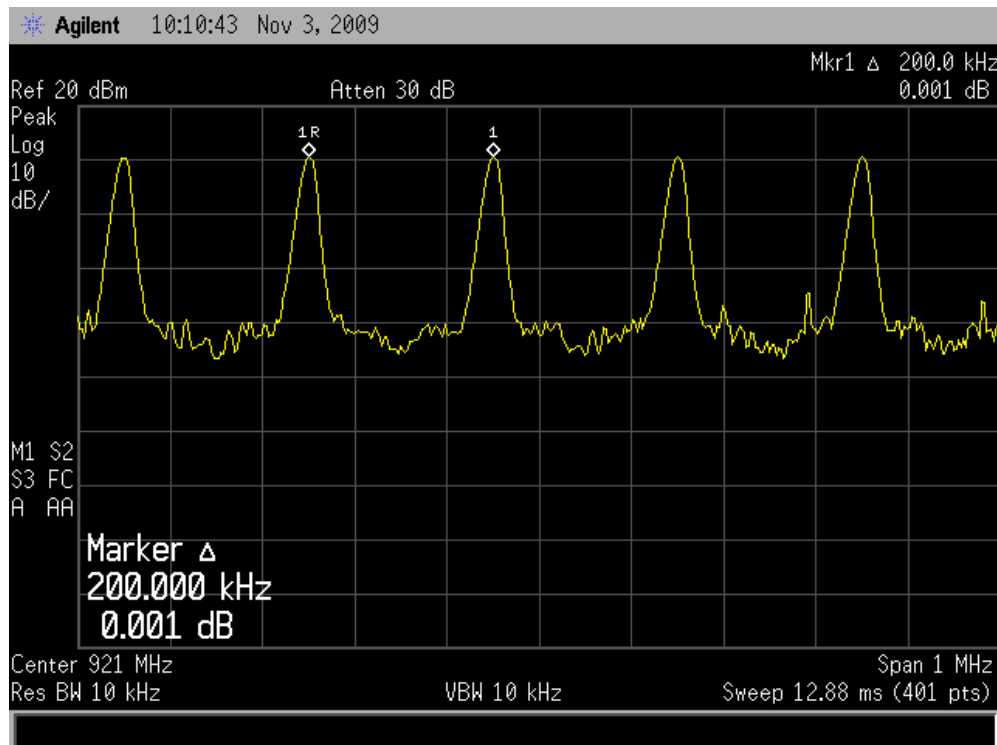
Trace = max hold

Allow the trace to stabilize. Use the marker-delta function to determine the separation between the peaks of the adjacent channels. The limit is specified in one of the subparagraphs of this Section. Submit this plot.

Equipment Used	Serial Number	Cal Date	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
3 November 2009	W. Raymond Stoner		

Unit tested: 67400139

Carrier separation is 200 kHz.



**15.247(a) (1) (i); (g); (h) / RSS-210 A8.1 (c)****Time of Occupancy, conducted**

The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter.

(i) For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 20 second period;

**Short Bursts 15.247 (g)**

... a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.

**Intelligence 15.247 (h)**

The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.

Verify that the transmitted signal does not occupy a single frequency for more than 400 mS in a 20 second period.

The EUT must have its hopping function enabled. Use the following spectrum analyzer settings:

Span = zero span, centered on a hopping channel

RBW = 1 MHz

VBW  $\geq$  RBW

Sweep = as necessary to capture the entire dwell time per hopping channel

Detector function = peak

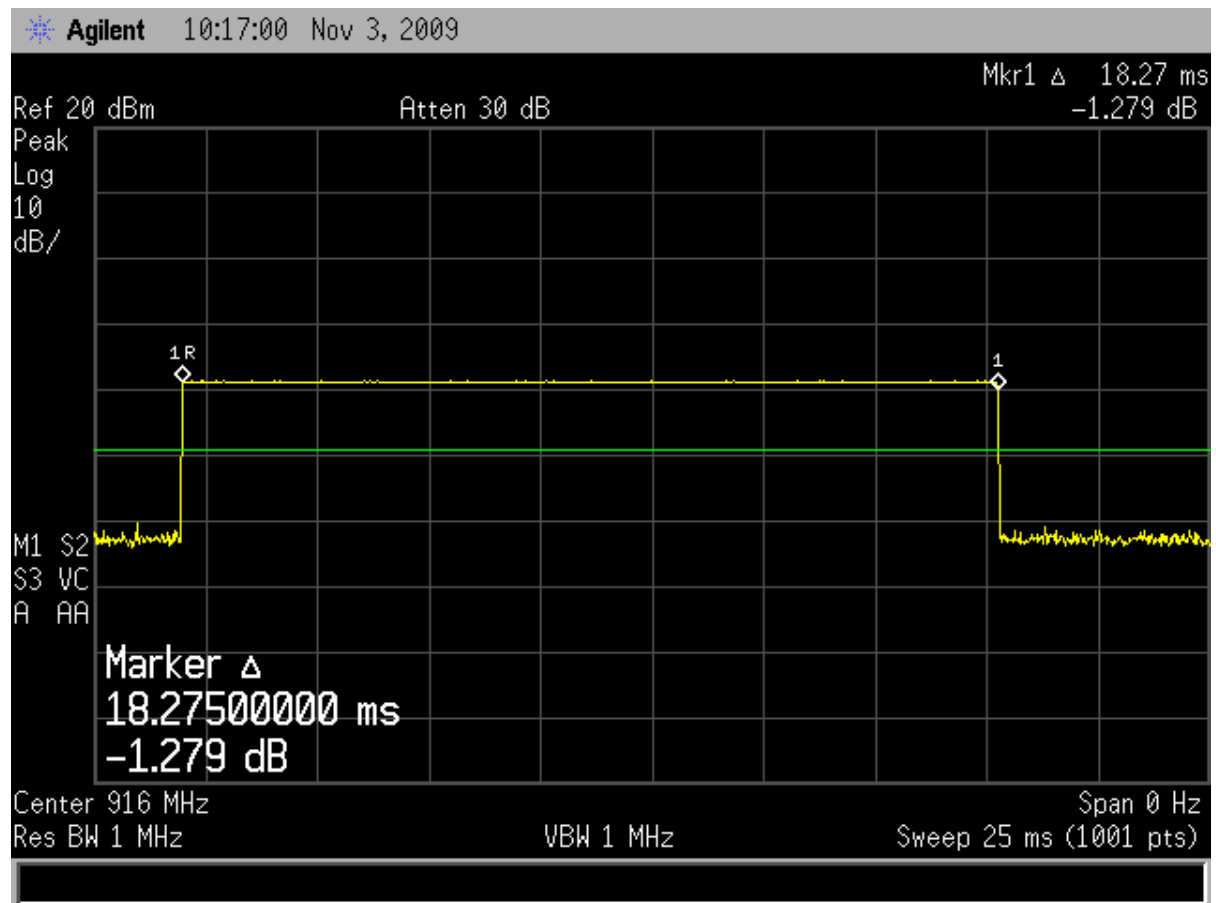
Trace = max hold

If possible, use the marker-delta function to determine the dwell time. If this value varies with different modes of operation (e.g., data rate, modulation format, etc.), repeat this test for each variation. Submit this plot(s).

Each transmission is 18.275 mS long. Each transmission takes place on one of 80 different channels (per 15.247 (a) (1) (i) and number of Hopping Channels test above) in a pseudo-random sequence which shows compliance to the Short Bursts requirements in 15.247 (g). All 80 channels are used equally on the average. The algorithm that determines the pseudo-random hop sequence does not allow the device to transmit on the same channel more than six times in a 20 second period. The maximum possible occupancy time on any one frequency is 109.65 mS within a 20 second period. In addition, there is no intelligence or capability in this system to monitor other usage in the spectrum or to provide coordination with any other transmitters.

Equipment Used	Serial Number	Cal Date	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
3 November 2009	W. Raymond Stoner		

Unit tested: 67400139



# 15.247(b) (2) / RSS-210 A8.4 (1)

## Power Output - Conducted

The maximum peak conducted output power of the intentional radiator shall not exceed the following: For frequency hopping systems operating in the 902-928 MHz band: 1 watt for systems employing at least 50 hopping channels.

Use the following spectrum analyzer settings:

Span = approximately 5 times the 20 dB bandwidth, centered on a hopping channel.

RBW > the 20 dB bandwidth of the emission being measured.

VBW ≥ RBW

Sweep = auto

Detector function = peak

Trace = max hold

Set RF level offset=cable loss

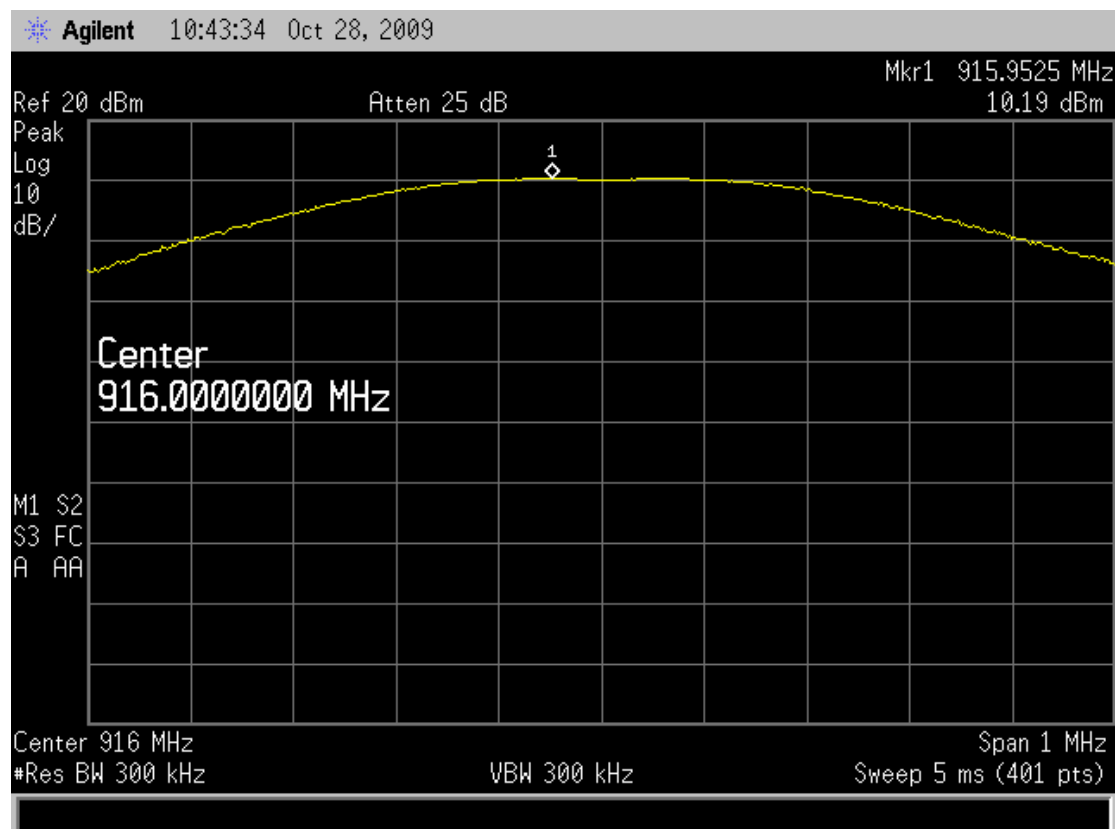
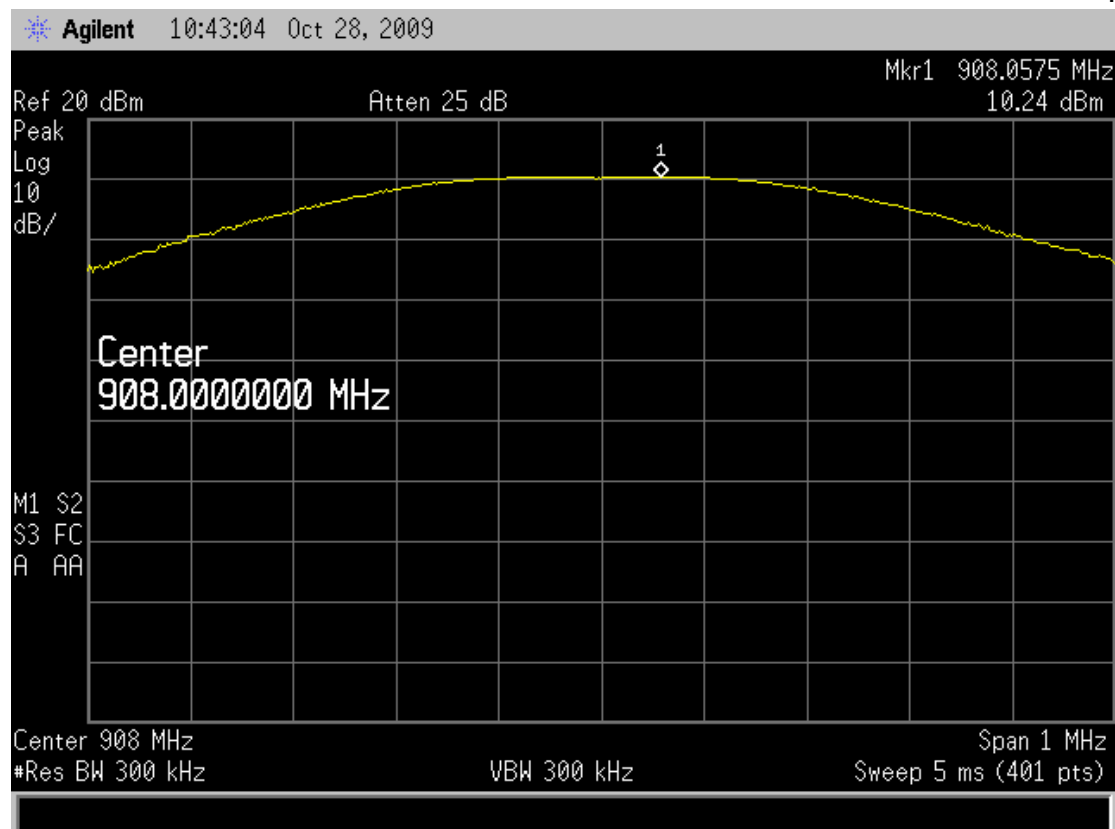
Cable loss of 1.1 dB was added to the spectrum analyzer as a correction. The marker value in the plots is the true corrected value.

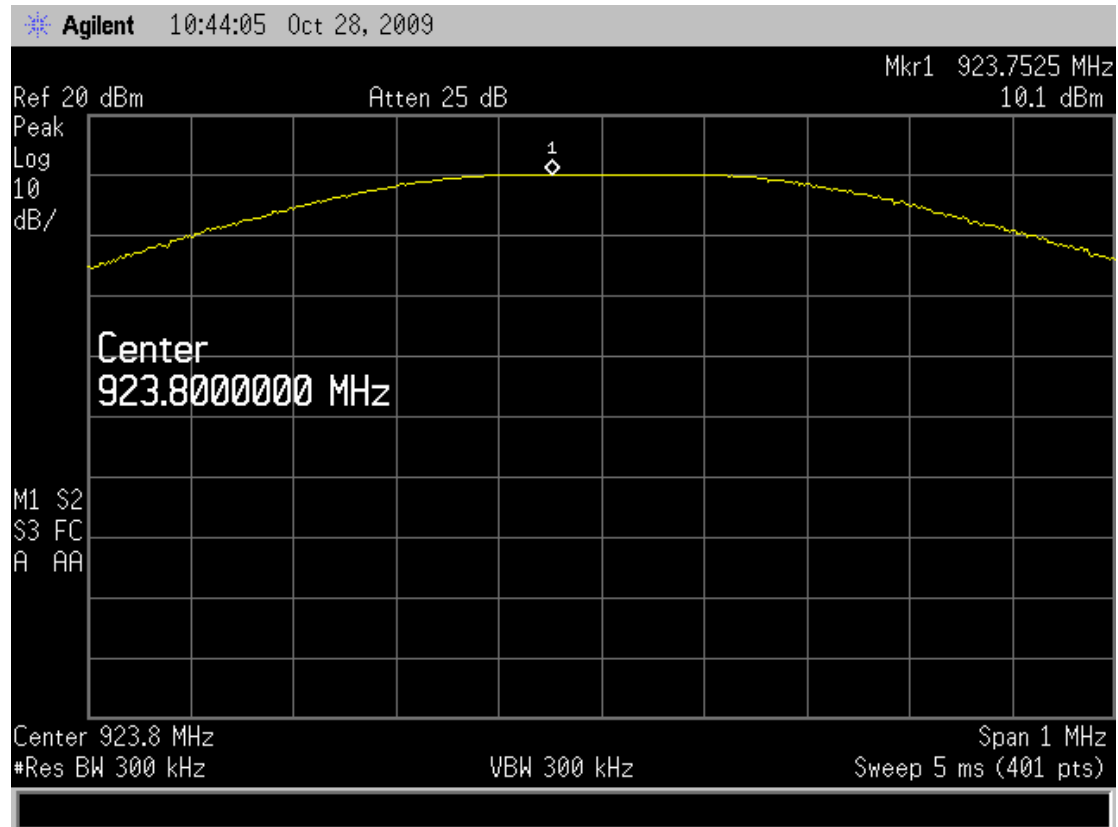
Allow the trace to stabilize. Use the marker-to-peak function to set the marker to the peak of the emission. The indicated level is the peak output power. The limit is specified in one of the subparagraphs of this Section. Submit this plot. A peak responding power meter may be used instead of a spectrum analyzer.

Equipment Used	Serial Number	Cal Date	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
28 October 2009	W. Raymond Stoner		

Unit tested: 67400139

Frequency, MHz	Power out, dBm	Power out, Watts
908	10.24	0.0106
916	10.19	0.0104
923.8	10.1	0.0102







## 15.247(d) / RSS-210 A8.5

### Non-restricted band spurious Emissions - Conducted

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)). (note: 15.247 (b)(3) is for digital modulation.

Follow the procedure outlined in Annex A, and B of this document.

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		
10/20/09	W. Raymond Stoner		

Unit tested: 67400138

Frequency range investigated was 9 kHz to 9.28GHz. (part 15.33 (a))

*Cable loss was added to the spectrum analyzer as a correction. The level in the table is the true corrected value.*

1	2	3	4	5
		Carrier		
Freq	Level	level	Limit	Margin
MHz	dBm	dBm	-20dBc	dB
1816	-18.92	10.24	-9.76	-9.16
1832	-19.86	10.24	-9.76	-10.1
1847.6	-20.44	10.24	-9.76	-10.68
5496	-61.78	10.24	-9.76	-52.02
5542.8	-58.91	10.24	-9.76	-49.15
6356	-58.42	10.24	-9.76	-48.66
6412	-77.62	10.24	-9.76	-67.86
6466.6	-68.16	10.24	-9.76	-58.4

$$[4] = [3] - 20; \quad [5] = [2] - [4];$$

## 15.205, 15.209(Radiated) / RSS-210 2.2, 2.6

### Restricted Bands Spurious Emissions - Radiated

(a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

(b) Except as provided in paragraphs (d) and (e) of this section, the field strength of emissions appearing within these frequency bands shall not exceed the limits shown in §15.209. At frequencies equal to or less than 1000 MHz, compliance with the limits in §15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1000 MHz, compliance with the emission limits in §15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in §15.35 apply to these measurements.

Measure the field strength of all transmitter spurious emissions in the restricted bands listed below. Follow the procedure outlined in Annex A of this document.

MHz	MHz	MHz	GHz
0.090-0.110	13.36-13.41	399.9-410	5.35-5.46
0.495-0.505 (FCC)	16.42-16.423	608-614	7.25-7.75
2.1735-2.1905	16.69475-16.69525	960- 1427*	8.025-8.5
4.125-4.128	16.80425-16.80475	1435-1626.5	9.0-9.2
4.17725-4.17775	25.5-25.67	1645.5-1646.5	9.3-9.5
4.20725-4.20775	37.5-38.25	1660-1710	10.6-12.7
5.677-5.683 (IC)	73-74.6	1718.8-1722.2	13.25-13.4
6.215-6.218	74.8-75.2	2200-2300	14.47-14.5
6.26775-6.26825	108-121.94	2310-2390	15.35-16.2
6.31175-6.31225	123-138	2483.5-2500	17.7-21.4
8.291-8.294	149.9-150.05	2655-2900**	22.01-23.12
8.362-8.366	156.52475-156.52525	3260-3267	23.6-24.0
8.37625-8.38675	156.7-156.9	3332-3339	31.2-31.8
8.41425-8.41475	162.0125-167.17	3345.8-3358	36.43-36.5
12.29-12.293	167.72-173.2	3600-4400	Above 38.6
12.51975-12.52025	240-285	4.5-5.15	
12.57675-12.57725	322-335.4		

- for reference the FCC has relaxed some of the restricted bands and IC has not. In the FCC rules today: \*960-1240 and \*1300-1427MHz; \*\*2690-2900MHz;

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		
10/20/09	W. Raymond Stoner		

Unit tested: 67400138

Per FCC DA 00-705. a Duty Cycle Correction Factor ( $20\log(\text{dwell time}/100\text{mS})$ ) can be applied to show compliance to the 15.209 limit. The maximum allowed correction factor is 20 dB.

$$20 \log (18.275 \text{ ms} / 100\text{mS}) = -14.8\text{dB}$$

dwell time is defined here as: 18.275ms as measured in above test.

### Spurious Emission Limits

Frequency (MHz)	Field Strength (microvolts/meter)	in dBuV/m	Measurement Distance (meters)*	maximum Peak +20 over Avg limit dBuV/m
0.009-0.490 2400F	2440F (kHz)		300	
0.490-1.705 24000F	2400F (kHz)		30	
1.705-30.0	30	29.5	30	49.5
30-88	100	40	3	60
88-216	150	43.5	3	63.5
216-960	200	46	3	66
Above 960	500	54	3	74

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

\* Adjust 40dB/decade when measuring at different distances than specified.

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

1	2	3	5	6	7	8	9	10	11	12	13	14
	Antenna	Antenna					Peak	Peak		Duty		
	Position	Height/		Antenna	Cable	Amplifier	Corrected	Corrected	Peak	Cycle	Limit with	
Frequency	Vertical or	Table	Level	Factor	Loss	Gain	level	Level	Limit	Correction	Duty Cycle correction	
MHz	Horizontal	Azimuth	dBm	dB/m	dBm	dB	dBm	dBuV/m	dBuV/m	dB	dBuV/m	margin
2724	Vertical	99/340	-40.89	29.36	5.27	-35.21	-41.47	65.53	54	14.9	68.9	-3.37
2724	Horizontal	100/335	-38.37	29.36	5.27	-35.21	-38.95	68.05	54	14.9	68.9	-0.85
2748	Vertical	118/190	-53.83	29.44	5.3	-35.2	-54.29	52.71	54	14.9	68.9	-16.19
2748	Horizontal	121/330	-48.57	29.44	5.3	-35.2	-49.03	57.97	54	14.9	68.9	-10.93
2771.4	Vertical	100/340	-46	29.52	5.32	-35.18	-46.34	60.66	54	14.9	68.9	-8.24
2771.4	Horizontal	99/330	-42.62	29.52	5.32	-35.18	-42.96	64.04	54	14.9	68.9	-4.86
3632	Vertical	102/160	-46.75	31.54	5.98	-34.85	-44.08	62.92	54	14.9	68.9	-5.98
3632	Horizontal	102/35	-48.95	31.54	5.98	-34.85	-46.28	60.72	54	14.9	68.9	-8.18
3664	Vertical	100/175	-54.14	31.63	6.01	-34.84	-51.34	55.66	54	14.9	68.9	-13.24
3664	Horizontal	102/350	-56.11	31.63	6.01	-34.84	-53.31	53.69	54	14.9	68.9	-15.21
3695.2	Vertical	100/175	-49.28	31.71	6.04	-34.82	-46.35	60.65	54	14.9	68.9	-8.25
3695.2	Horizontal	102/185	-51.96	31.71	6.04	-34.82	-49.03	57.97	54	14.9	68.9	-10.93
4540	Vertical	100/55	-53.26	32.27	6.85	-35.02	-49.16	57.84	54	14.9	68.9	-11.06
4540	Horizontal	100/220	-54.38	32.27	6.85	-35.02	-50.28	56.72	54	14.9	68.9	-12.18
4580	Vertical	134/210	-67	32.34	6.86	-35.03	-62.83	44.17	54	14.9	68.9	-24.73
4580	Horizontal	112/225	-67.24	32.34	6.86	-35.03	-63.07	43.93	54	14.9	68.9	-24.97
4619	Vertical	100/90	-63.6	32.41	6.9	-35.05	-59.34	47.66	54	14.9	68.9	-21.24
4619	Horizontal	102/15	-64.31	32.41	6.9	-35.05	-60.05	46.95	54	14.9	68.9	-21.95
5448	Vertical	100/270	-61.5	34.09	7.25	-35.51	-55.67	51.33	54	14.9	68.9	-17.57
5448	Horizontal	106/230	-63.02	34.09	7.25	-35.51	-57.19	49.81	54	14.9	68.9	-19.09
7264	Vertical	158/5	-58.49	35.93	8.53	-35.05	-49.08	57.92	54	14.9	68.9	-10.98
7264	Horizontal	100/355	-61.16	35.93	8.53	-35.05	-51.75	55.25	54	14.9	68.9	-13.65
7328	Vertical	140/275	-64.52	36.09	8.58	-34.99	-54.84	52.16	54	14.9	68.9	-16.74
7328	Horizontal	101/40	-67	36.09	8.58	-34.99	-57.32	49.68	54	14.9	68.9	-19.22
7390.4	Vertical	100/135	-64.9	36.24	8.61	-34.93	-54.98	52.02	54	14.9	68.9	-16.88
7390.4	Horizontal	106/355	-65.82	36.24	8.61	-34.93	-55.9	51.1	54	14.9	68.9	-17.8
8172	Vertical	100/120	-67.48	36.94	9.25	-35.1	-56.39	50.61	54	14.9	68.9	-18.29
8172	Horizontal	99/245	-66.73	36.94	9.25	-35.1	-55.64	51.36	54	14.9	68.9	-17.54
8244	Vertical	170/150	-68.07	37	9.29	-35.05	-56.83	50.17	54	14.9	68.9	-18.73
8244	Horizontal	100/190	-68.2	37	9.29	-35.05	-56.96	50.04	54	14.9	68.9	-18.86
8314.2	Vertical	100/135	-68.11	37.05	9.29	-35.01	-56.78	50.22	54	14.9	68.9	-18.68
8314.2	Horizontal	120/230	-67.35	37.05	9.29	-35.01	-56.02	50.98	54	14.9	68.9	-17.92

[9] = Duty Cycle Correction from above      [10] = [5]+[6]+[7]+[8] +[9];      [11] = [10] +107;  
[12] from table above;

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

## RSS-Gen 7.2.3 (RSS-GEN 4.10) Receiver Spurious Emission Limits

### 7.2.3.2 Radiated Measurement

All spurious emissions shall comply with the limits of Table 1.

### Receiver Spurious Emissions

The receiver shall be operated in the normal receive mode near the mid-point of the band over which the receiver is designed to operate. Unless otherwise specified in the applicable RSS, the radiated emission measurement is the standard measurement method (with the device's antenna in place) to measure receiver spurious emissions. Radiated emission measurements are to be performed using a calibrated open-area test site. As an alternative, the conducted measurement method may be used when the antenna is detachable. In such a case, the receiver spurious signal may be measured at the antenna port. If the receiver is super-regenerative, stabilize it by coupling to it an un-modulated carrier on the receiver frequency (antenna conducted measurement) or by transmitting an un-modulated carrier on the receiver frequency from an antenna in the proximity of the receiver (radiated measurement). Taking care not to overload the receiver, vary the amplitude and frequency of the stabilizing signal to obtain the highest level of the spurious emissions from the receiver. For either method, the search for spurious emissions shall be from the lowest frequency internally generated or used in the receiver (e.g. local oscillator, intermediate or carrier frequency), or 30 MHz, whichever is the higher, to at least 3 times the highest tunable or local oscillator frequency, whichever is the higher, without exceeding 40 GHz.

### Receiver Spurious Emission Standard

The following receiver spurious emission limits shall be complied with:

- (a) If a radiated measurement is made, all spurious emissions shall comply with the limits of Table 1. The resolution bandwidth of the spectrum analyzer shall be 100 kHz for spurious emission measurements below 1.0 GHz, and 1.0 MHz for measurements above 1.0 GHz.

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		
10/20/09	W. Raymond Stoner		

Unit tested: 67400138

**Table 1- Spurious Emission Limits for Receivers**

Spurious Frequency (MHz)	Field Strength (microvolt/m at 3 meters)	in dBuV/m
30-88	100	40
88-216	150	43.5
216-960	200	46
Above 960	500	54

FS(uV/m) = 10 raised to the power of {(dBuV/m)/20}

Frequency range investigated was 9kHz to 5 GHz.

1	2	3	4	5	6	7	8	9	10
	Antenna	Antenna					Peak		
	Position	Height/		Antenna	Cable	Amplifier	Corrected	Peak	
Frequency	Vertical or	Table	Level	Factor	Loss	Gain	Level	Limit	
MHz	Horizontal	Azimuth	dBm	dB/m	dBm	dB	dbuV/m	dBuV/m	margin
852	Vertical	124/75	51.29	22.4	2.5	-35.07	41.12	46	-4.88
852	Horizontal	132/0	47.83	22.4	2.5	-35.07	37.66	46	-8.34

[8] = [4]+[5]+[6]+[7];

[9] = From Table above

[10]=[8] – [9]

15.247 (d)

**Band-edge compliance of RF Conducted Emissions***see spurious emissions section above for rules.*

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation

RBW  $\geq$  1% of the span

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Allow the trace to stabilize. Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge. Enable the marker-delta function, and then use the marker-to-peak function to move the marker to the peak of the in-band emission. The marker-delta value now displayed must comply with the limit specified in this Section. Submit this plot.

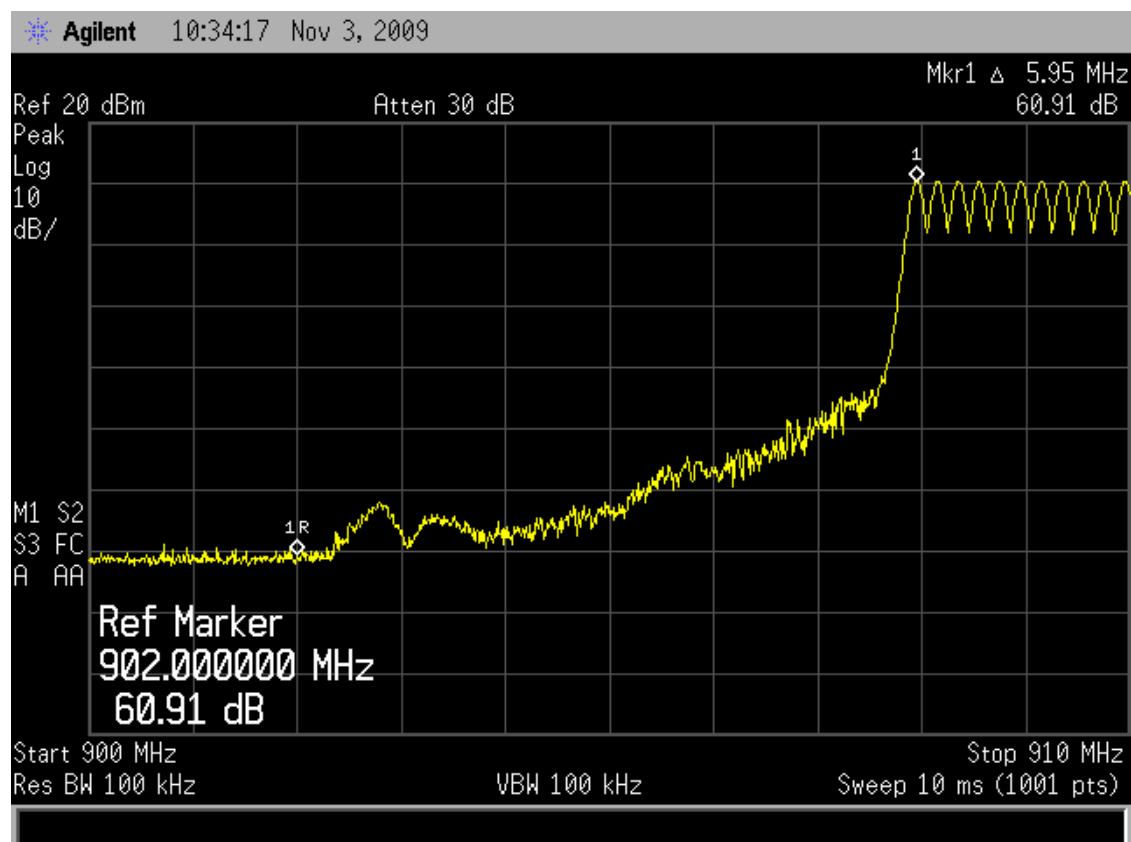
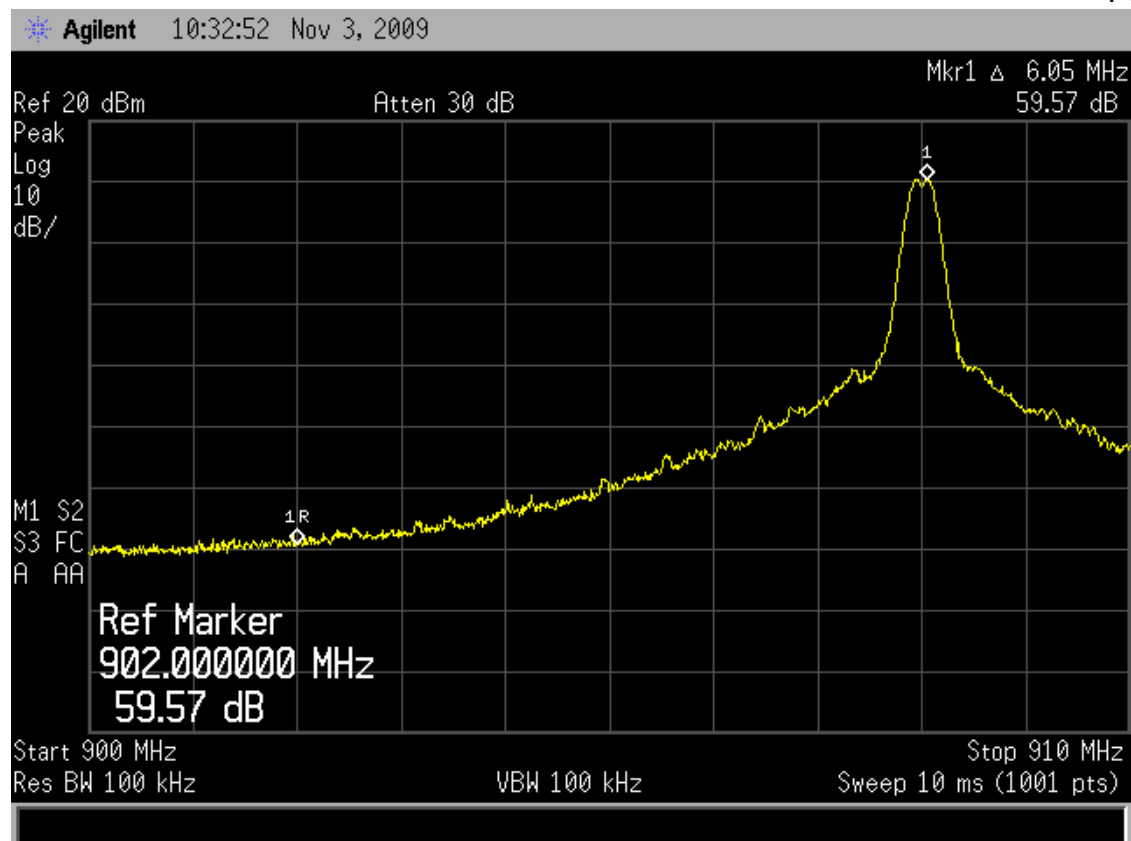
Now, using the same instrument settings, enable the hopping function of the EUT. Allow the trace to stabilize. Follow the same procedure listed above to determine if any spurious emissions caused by the hopping function also comply with the specified limit. Submit this plot.

Equipment Used	Serial Number	Cal Date	Due
HP4407B	MY45107856	3/09	3/11
Date	Tested by		
3 November 2009	W. Raymond Stoner		

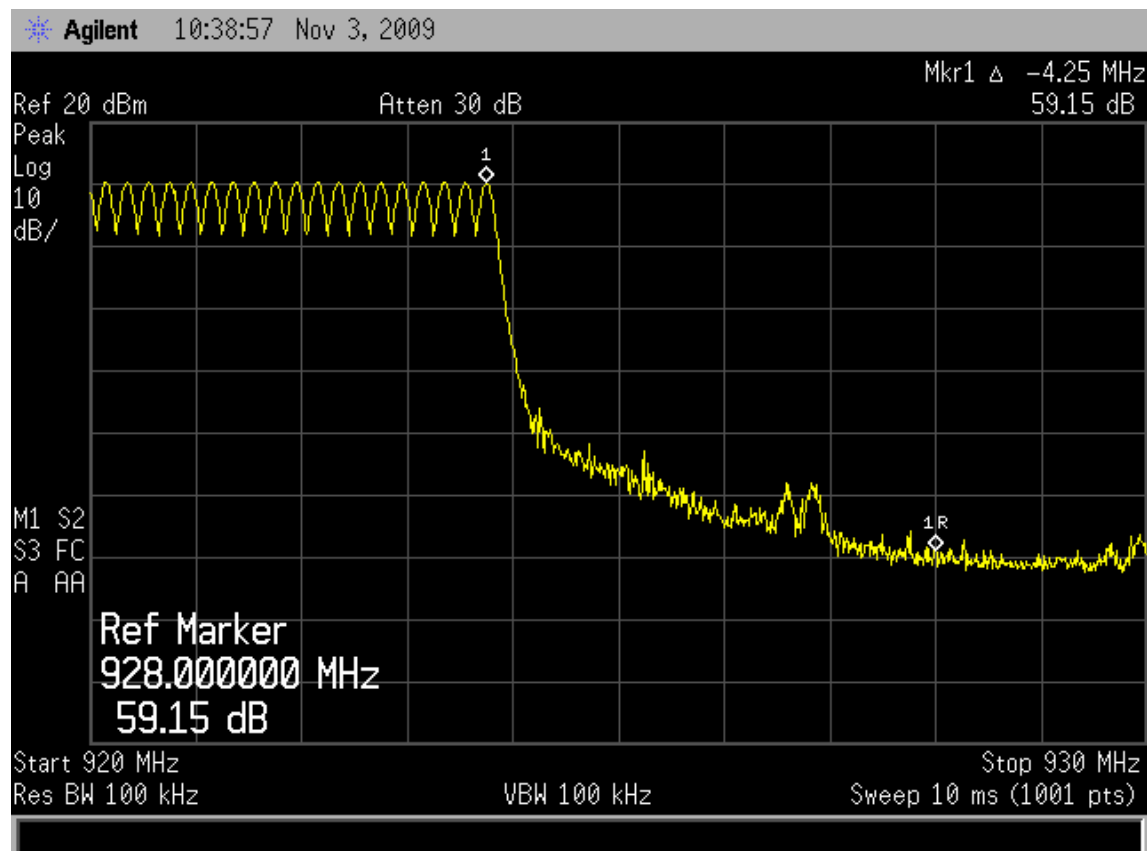
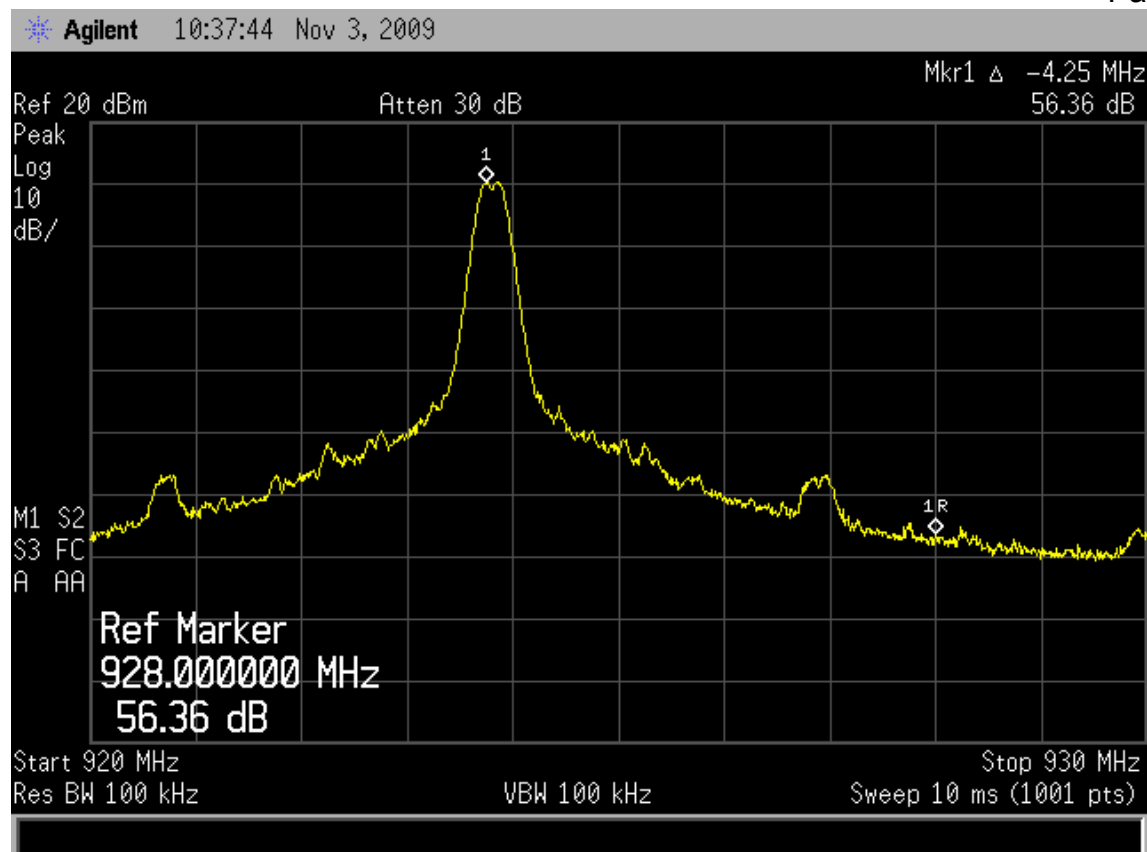
Unit tested: 67400139

Band edge @ 902 MHz is down -59.6 dbc

Band edge @ 928 MHz is down -56.4 dbc







**1.1310 & 2.1093(portable) & KDB447498 / RSS-102 Sec 4.2****RF Safety Evaluation**

This device is considered a body worn portable device, MPE does not apply.. The EIRP is below the minimum threshold for SAR evaluation.

This transmitter can only transmit simultaneously with the BlueTooth module, all other transmitter are disabled. The BlueTooth module is also below the threshold for SAR evaluation.

**ANNEX A**  
**direct from FCC DA-00-705, March 30, 2000**

**Spurious RF Conducted Emissions**

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the in-band emission and all spurious emissions (e.g., harmonics) from the lowest frequency generated in the EUT up through the 10<sup>th</sup> harmonic. Typically, several plots are required to cover this entire span.

RBW = 100 kHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Allow the trace to stabilize. Set the marker on the peak of any spurious emission recorded. The level displayed must comply with the limit specified in this Section. Submit these plots.

**Spurious Radiated Emissions**

This test is required for any spurious emission or modulation product that falls in a Restricted Band, as defined in Section 15.205. It must be performed with the highest gain of each type of antenna proposed for use with the EUT. Use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 1 MHz for  $f \geq 1$  GHz, 100 kHz for  $f < 1$  GHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Follow the guidelines in ANSI C63.4-1992 with respect to maximizing the emission by rotating the EUT, measuring the emission while the EUT is situated in three orthogonal planes (if appropriate), adjusting the measurement antenna height and polarization, etc. A pre-amp and a high pass filter are required for this test, in order to provide the measuring system with sufficient sensitivity. Allow the trace to stabilize. The peak reading of the emission, after being corrected by the antenna factor, cable loss, pre-amp gain, etc., is the peak field strength, which must comply with the limit specified in Section 15.35(b). Submit this data.

Now set the VBW to 10 Hz, while maintaining all of the other instrument settings. This peak level, once corrected, must comply with the limit specified in Section 15.209. If the dwell time per channel of the hopping signal is less than 100 ms, then the reading obtained with the 10 Hz VBW may be

further adjusted by a "duty cycle correction factor", derived from  $20\log(\text{dwell time}/100 \text{ ms})$ , in an effort to demonstrate compliance with the 15.209 limit. Submit this data.

If the emission on which a radiated measurement must be made is located at the edge of the authorized band of operation, then the alternative "marker-delta" method, listed at the end of this document, may be employed.

### **Alternative Test Procedures**

If antenna conducted tests cannot be performed on this device, radiated tests to show compliance with the peak output power limit specified in Section 15.247(b) (2) and the spurious RF conducted emission limit specified in Section 15.247(d) are acceptable. A pre-amp, and, in the latter case, a high pass filter, are required for the following measurements.

- 1) Calculate the transmitter's peak power using the following equation:

$$E = \frac{\sqrt{30PG}}{d}$$

Where: E is the measured maximum fundamental field strength in V/m, utilizing a RBW  $\geq$  the 20 dB bandwidth of the emission, VBW > RBW, peak detector function. Follow the procedures in C63.4-2003 with respect to maximizing the emission.

G is the numeric gain of the transmitting antenna with reference to an isotropic radiator.

d is the distance in meters from which the field strength was measured.

P is the power in watts for which you are solving:

$$P = \frac{(E \times d)^2}{30G}$$

- 2) To demonstrate compliance with the spurious RF conducted emission requirement of Section 15.247(d), use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 100 kHz

VBW  $\geq$  RBW

Sweep = auto

Detector function = peak

Trace = max hold

Measure the field strength of both the fundamental emission and all spurious emissions with these settings. Follow the procedures in C63.4-2003 with respect to maximizing the emissions. The measured field strength of all spurious emissions must be below the measured field strength of the fundamental emission by the amount specified in Section 15.247(d). Note that if the emission falls in a Restricted Band, as defined in Section 15.205, the procedure for measuring spurious radiated emissions, listed above, must be followed.

## **Marker-Delta Method**

In making radiated band-edge measurements, there can be a problem obtaining meaningful data since a measurement instrument that is tuned to a band-edge frequency may also capture some in-band signals when using the resolution bandwidth (RBW) required by measurement procedure ANSI C63.4-1992 (hereafter C63.4). In an effort to compensate for this problem, we have developed the following technique for determining band-edge compliance.

STEP 1) Perform an in-band field strength measurement of the fundamental emission using the RBW and detector function required by C63.4 and our Rules for the frequency being measured. For example, for a device operating in the 902-928 MHz band under Section 15.249, use a 120 kHz RBW with a CISPR QP detector (a peak detector with 100 kHz RBW may alternatively be used). For transmitters operating above 1 GHz, use a 1 MHz RBW, a 1 MHz VBW, and a peak detector (as required by Section 15.35). Repeat the measurement with an average detector (i.e., 1 MHz RBW with 10 Hz VBW). Note: For pulsed emissions, other factors must be included. Please contact the FCC Lab for details if the emission under investigation is pulsed. Also, please note that radiated measurements of the fundamental emission of a transmitter operating under 15.247 are not normally required, but they are necessary in connection with this procedure.

STEP 2) Choose a spectrum analyzer span that encompasses both the peak of the fundamental emission and the band-edge emission under investigation. Set the analyzer RBW to 1% of the total span (but never less than 30 kHz) with a video bandwidth equal to or greater than the RBW. Record the peak levels of the fundamental emission and the relevant band-edge emission (i.e., run several sweeps in peak hold mode). Observe the stored trace and measure the amplitude delta between the peak of the fundamental and the peak of the band-edge emission. This is not a field strength measurement; it is only a relative measurement to determine the amount by which the emission drops at the band-edge relative to the highest fundamental emission level.

STEP 3) Subtract the delta measured in step (2) from the field strengths measured in step (1). The resultant field strengths (CISPR QP, average, or peak, as appropriate) are then used to determine band-edge compliance as required by Section 15.205.

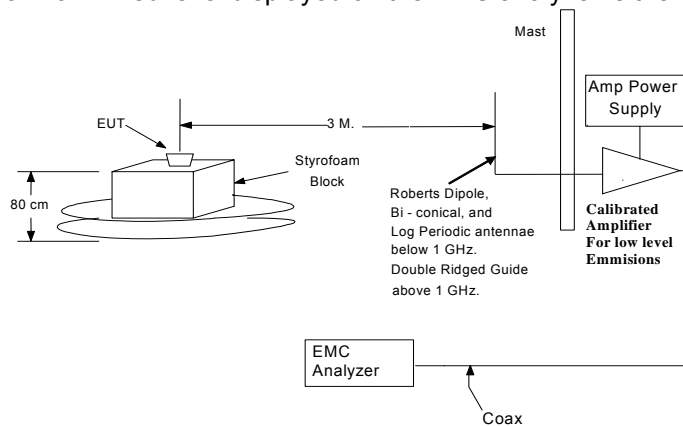
STEP 4) The above "delta" measurement technique may be used for measuring emissions that are up to two "standard" bandwidths away from the band-edge, where a "standard" bandwidth is the bandwidth specified by C63.4 for the frequency being measured. For example, for band-edge measurements in the restricted band that begins at 2483.5 MHz, C63.4 specifies a measurement bandwidth of at least 1 MHz. Therefore you may use the "delta" technique for measuring emissions up to 2 MHz removed from the band-edge. Radiated emissions that are removed by more than two "standard" bandwidths must be measured in the conventional manner.

## ANNEX B

### Field 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 C**

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 5<sup>th</sup> 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 5<sup>th</sup> harmonic of the highest frequency generated without exceeding 40 GHz.