

**VTech Telecommunications Ltd.**

Application  
For  
Permissive Change Class II

Unlicensed Personal Communication Service Devices

**FCC ID: EW780-6948-00**

**Test Report Number: HK08120094-1**

**Issue Date: January 20, 2009**

TL/ ac

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**Intertek Testing Services Hong Kong Ltd.**

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# INTERTEK TESTING SERVICES

## MEASUREMENT/TECHNICAL REPORT

VTech Telecommunications Ltd.

Model: LS6215, LS6215-xy, LS6225, LS6225-xy, LS6226, LS6226-xy, LS6205

FCC ID: EW780-6948-00

This report concerns (check one:) Original Grant  Class II Change

Equipment Type : PUB - Part 15 Unlicensed PCS Base Station  
PUE - Part 15 Unlicensed PCS portable Tx held to ear

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes  No

If yes, defer until :

\_\_\_\_\_  
Date

Company Name agrees to notify the Commission by: \_\_\_\_\_  
Date

of the intended date of announcement of the product so that the grant can be issued on that date.

Transition Rules Request per 15.37? Yes  No

If no, assumed Part 15, Subpart D for Unlicensed Personal Communication Service Device - the new 47 CFR [10-01-07 Edition] Provision.

Report prepared by: Leung Wai Leung, Tommy

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# INTERTEK TESTING SERVICES

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## Appendix – Exhibits of Application for Certification

**INTERTEK TESTING SERVICES**

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**EXHIBIT 1  
SUMMARY OF TEST RESULTS**

## INTERTEK TESTING SERVICES

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### 1.0 Summary of Test Results

**VTech Telecommunications Ltd.**

**Model: LS6215, LS6215-xy, LS6225, LS6225-xy, LS6226, LS6226-xy, LS6205**

**FCC ID: EW780-6948-00**

<b>Technical Requirements</b>				
<b>Test Items</b>	<b>FCC Part 15 Section</b>	<b>Test Procedure ANSI C63.17 / ANSI C63.4</b>	<b>Results</b>	<b>Details see section</b>
Antenna Requirement	15.317	---	Pass	4.1
Directional Gain of the Antenna	15.319(e)	4.3.1	Pass	4.2
Power Spectral Density	15.319(d)	6.1.5	Pass	4.3
Unwanted Emission Inside the Sub-Band	15.323(d)	6.1.6.1	Pass	4.4
Emissions Outside the Sub-Band	15.323(d)	6.1.6.2	Pass	4.5
AC Power Lines Conducted Emissions from Transmitter Portion of EUT	15.315	7 *	Pass	4.6
Radio Frequency Radiation Exposure	15.319(i)	---	Pass	4.7
Monitoring Antenna	15.323(c)(8)	4	Pass	4.8

**Test Engineer:**

**Approved By:**



\_\_\_\_\_  
Ken Sit  
Assistant Manger

\_\_\_\_\_  
Leung Wai Leung, Tommy  
Senior Manager

Date: January 20, 2009

Date: January 20, 2009

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**EXHIBIT 2  
GENERAL DESCRIPTION**

## **INTERTEK TESTING SERVICES**

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### **2.0 General Description**

#### 2.1 Product Description

The LS6215-2 is a 1.9GHz Digital Modulation Cordless Phone with Caller ID and Speakerphone. It operates at frequency range of 1921.536MHz to 1928.448MHz with 5 channels (1921.536MHz, 1923.264MHz, 1924.992MHz, 1926.720MHz and 1928.448MHz). The Base Unit is powered by an adaptor 117VAC to 6VAC 300mA. The Handset is powered by a "Ni-MH" type rechargeable battery pack (2.4V 500mAh).

The LS6225-2 is a 1.9GHz Digital Modulation Cordless Phone with Caller ID, Speakerphone and Digital Answering Machine. It operates at frequency range of 1921.536MHz to 1928.448MHz with 5 channels (1921.536MHz, 1923.264MHz, 1924.992MHz, 1926.720MHz and 1928.448MHz). The Base Unit is powered by an adaptor 100-120VAC to 6VDC 400mA. The Handset is powered by a "Ni-MH" type rechargeable battery pack (2.4V 500mAh).

The antennas used in base unit and handset are integral, and the test sample is a prototype.

The Model: LS6215 and LS6215-xy are the same as the Model: LS6215-2 in hardware aspect. Suffix (x, y) indicates different number of handset and different color of enclosure respectively. The difference in model number serves as marketing strategy.

The Model: LS6225, LS6225-xy, LS6226 and LS6226-xy are the same as the Model: LS6225-2 in hardware aspect. Suffix (x, y) indicates different number of handset and different color of enclosure respectively. The difference in model number serves as marketing strategy.

Model: LS6205 is an additional handset with an external charger for selling.

The Handsets in Models: LS6215, LS6215-xy, LS6225, LS6225-xy, LS6226, LS6226-xy and LS6205 are identical as follows: electrical designs, including software and firmware, PCB layout and construction design/ physical design/ enclosure.

RF module for base units of LS6215, LS6215-xy, LS6225, LS6225-xy, LS6226 and LS6226-xy are same with previous granted models CS6219-xy and CS6229-xy.

Connection between the base unit and the telephone network is accomplished through the use of USOC RJ11C in the 2-wire loop calling central office line.

The technical description is saved as filename: descri.pdf

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### 2.2 Purpose of Application

The purpose of change is saved as filename: product change.pdf

For the Model: LS6215-2 and LS6225-2, the RF module and algorithm are the same as the previous granted Model: CS6219-2 and CS6229-2. Please refer to the product change.pdf for the details of similarity and difference between these models.

This is an application for Certification of a PUB - Part 15 Unlicensed PCS Base Station, PUE - Part 15 Unlicensed PCS portable Tx held to ear. The device is also subject to Part 68 Registration. A Verification report has been prepared for the digital device portion.

### 2.3 Test Methodology

The radiated emission measurements for unintentional radiator (if any) and AC power line-conducted emission measurements were performed according to the test procedures specified in ANSI C63.4 (2003). The radiated emission measurements for intentional radiator contained in UPCS device, antenna conducted measurements were performed according to the test procedures specified in ANSI C63.17 (2006). All radiated measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "Justification Section" of this Application. All other measurements were made in accordance with the procedures in 47 CFR Part 2.

### 2.4 Test Facility

The open area test site and conducted measurement facility used to collect the emission data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC.

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**EXHIBIT 3  
SYSTEM TEST CONFIGURATION**

## INTERTEK TESTING SERVICES

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### 3.0 System Test Configuration

#### 3.1 Justification

For emissions testing, the equipment under test (EUT) was setup to transmit continuously in burst mode with pseudo-random data to simplify the measurement methodology. Care was taken to ensure proper power supply voltages during testing. During testing, all cables (if any) were manipulated to produce worst-case emissions. The handset (if any) was powered by a fully charged battery.

For the measurements, the EUT was attached to a plastic stand if necessary and placed on the wooden turntable. If the base unit attached to peripherals, they were connected and operational (as typical as possible).

The signal was maximized through rotation and placement in the three orthogonal axes. The antenna height and polarization were varied during the search for maximum signal level. The antenna height was varied from 1 to 4 meters. Detector function was in peak mode. Radiated emissions were taken at three meters unless the signal level was too low for measurement at that distance. If necessary, a pre-amplifier was used and/or the test was conducted at a closer distance.

The spectrum analyzer resolution bandwidth was approximately 1% of the EUT emission bandwidth, unless otherwise specified.

Radiated emission measurements were performed from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

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### 3.2 Conducted Emission Test Configuration

The setup and equipment setting were made in accordance with ANSI C63.17. The antenna of EUT transmitter was replaced by a coaxial cable. The impedance matching of connection, cable loss and external RF attenuator were taken into account. The EUT was arranged to communicate via a fixed carrier frequency between its transmitter and a companion device. The transmission was configured in burst mode with pseudo-random data as typical as normal operation.

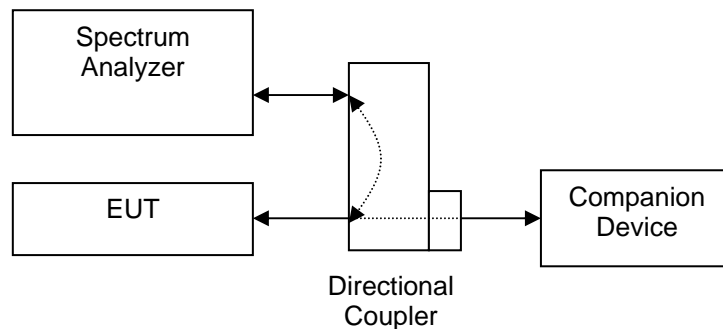


Figure 3.2.1

### 3.3 EUT Exercising Software

The EUT exercise program (if any) used during radiated and conducted testing was designed to exercise the various system components in a manner similar to a typical use.

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### 3.4 Details of EUT and Description of Peripherals

#### Details of EUT:

An AC adaptor and/or a battery (provided with the unit) were used to power the device. Their description are listed below.

- (1) For Model: LS6215-2 - Base Unit: An AC adaptor (117VAC to 6VAC 300mA, Model: UA-0603) (Supplied by Client)
- (2) For Model: LS6225-2 - Base Unit: An AC adaptor (100-120VAC to 6VDC 400mA, Model: SSA-5AP-09 US 060040L) (Supplied by Client)
- (3) Handset: A "Ni-MH" Type Rechargeable Battery Pack (2.4V 500mAh) (Supplied by Client)

#### Description of Peripherals:

- (1) Telecommunication cable with RJ11C connectors (1m, unshielded), terminated (Supplied by Intertek)

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### 3.5 Measurement Uncertainty

When determining of the test conclusion, the Measurement Uncertainty test has been considered.

### 3.6 Equipment Modification

Any modifications installed previous to testing by VTech Telecommunications Ltd. will be incorporated in each production model sold/leased in the United States.

No modifications were installed by Commercial and Electrical Division, Intertek Testing Services Hong Kong Ltd.

All the items listed under section 3.0 of this report are confirmed by:

*Confirmed by:*

*Leung Wai Leung, Tommy  
Senior Manager  
Intertek Testing Services Hong Kong Ltd.  
Agent for VTech Telecommunications Ltd.*



\_\_\_\_\_  
Signature

\_\_\_\_\_  
January 20, 2009 Date

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**EXHIBIT 4  
MEASUREMENT RESULTS**

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.0 **Measurement Results**

#### 4.1 Antenna Requirement, FCC Rule 15.317:

EUT must meet the antenna requirement of FCC Rule 15.203.

- EUT uses a permanently attached antenna which is considered sufficient to comply with the provisions of this rule. Please refer to Exhibit 5: Internal Photos for more details.
  
- EUT uses a unique antenna jack or electrical connector which is considered sufficient to comply with the provisions of this rule. Please refer to Exhibit 5: Internal Photos for more details.

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.2 Directional Gain of the Antenna, FCC Rule FCC 15.319(e):

The peak transmit power shall be reduced by the amount in dB that the maximum directional gain of the antenna exceeds 3 dBi.

The requirements are made in accordance with ANSI C63.17 sub-clause 4.3.1.

- Manufacturer declares that the directional gain of the antenna is less than or equal to 3dBi. No peak transmit power reduction is required.
- Manufacturer declares that the directional gain of the antenna is greater than 3dBi. The peak transmit power shall be reduced by \_\_\_\_\_ dB.

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.3 Power Spectral Density, FCC Rule 15.319(d):

Power spectral density shall not exceed 3 mW (4.8dBm) in any 3 kHz bandwidth as measured with a spectrum analyzer having a resolution bandwidth of 3 kHz.

Measurements are made in accordance with ANSI C63.17 sub-clause 6.1.5. Test setup is shown in section 3.2 Figure 3.2.1.

#### Test Results:

##### I. Traffic Carrier - Base Unit - Model: LS6225-2

Channel	Channel Frequency (MHz)	Measured Power Spectral Density (dBm/3kHz)	Limit (dBm/3 kHz)	Results
Lowest	1921.536	-9.9	4.8	Pass
Highest	1928.448	-11.8	4.8	Pass

##### II. Dummy Carrier - Base Unit - Model: LS6225-2

Channel	Channel Frequency (MHz)	Measured Power Spectral Density (dBm/3kHz)	Limit (dBm/3 kHz)	Results
Lowest	1921.536	-15.8	4.8	Pass
Highest	1928.448	-14.6	4.8	Pass

##### III. Traffic Carrier - Base Unit - Model: LS6215-2

Channel	Channel Frequency (MHz)	Measured Power Spectral Density (dBm/3kHz)	Limit (dBm/3 kHz)	Results
Lowest	1921.536	-11.6	4.8	Pass
Highest	1928.448	-10.8	4.8	Pass

##### IV. Dummy Carrier - Base Unit - Model: LS6215-2

Channel	Channel Frequency (MHz)	Measured Power Spectral Density (dBm/3kHz)	Limit (dBm/3 kHz)	Results
Lowest	1921.536	-13.8	4.8	Pass
Highest	1928.448	-7.8	4.8	Pass

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.3 Power Spectral Density, FCC Rule 15.319(d): - Continued

#### V. Traffic Carrier - Handset

Channel	Channel Frequency (MHz)	Measured Power Spectral Density (dBm/3kHz)	Limit (dBm/3 kHz)	Results
Lowest	1921.536	-6.4	4.8	Pass
Highest	1928.448	-6.8	4.8	Pass

Please refer to the attached plots for more details:

Base Unit - Model: LS6225-2

Plot B3A1: Lowest Channel Power Spectral Density (Traffic Carrier)

Plot B3B1: Highest Channel Power Spectral Density (Traffic Carrier)

Plot B3C1: Lowest Channel Power Spectral Density (Dummy Carrier)

Plot B3D1: Highest Channel Power Spectral Density (Dummy Carrier)

Base Unit - Model: LS6215-2

Plot B3A2: Lowest Channel Power Spectral Density (Traffic Carrier)

Plot B3B2: Highest Channel Power Spectral Density (Traffic Carrier)

Plot B3C2: Lowest Channel Power Spectral Density (Dummy Carrier)

Plot B3D2: Highest Channel Power Spectral Density (Dummy Carrier)

Handset

Plot H3A: Lowest Channel Power Spectral Density (Traffic Carrier)

Plot H3B: Highest Channel Power Spectral Density (Traffic Carrier)

The plots of the power spectral density are saved as filename: psd.pdf

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

#### 4.4 Unwanted Emission Inside the Sub-Band, FCC Rule 15.323(d):

Emissions inside the sub-band must comply with the following emission mask:

1. In the bands between  $1B$  and  $2B$  measured from the center of the emission bandwidth, emission shall be at least 30 dB below the permitted peak transmit power
2. In the bands between  $2B$  and  $3B$  measured from the center of the emission bandwidth, emission shall be at least 50 dB below the permitted peak transmit power
3. In the bands between  $3B$  and the band edge, emission shall be at least 60 dB below the permitted peak transmit power

Where  $B$  = emission bandwidth in Hz

Measurements are made in accordance with ANSI C63.17 sub-clause 6.1.6.1. Test setup is shown in section 3.2 Figure 3.2.1.

#### Test Results:

##### I. Traffic Carrier - Base Unit

Channel	Channel Frequency (MHz)	Results
Lowest	1921.536	Pass
Highest	1928.448	Pass

##### II. Dummy Carrier - Base Unit

Channel	Channel Frequency (MHz)	Results
Lowest	1921.536	Pass
Highest	1928.448	Pass

##### III. Traffic Carrier - Handset

Channel	Channel Frequency (MHz)	Results
Lowest	1921.536	Pass
Highest	1928.448	Pass

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.4 Unwanted Emission Inside the Sub-Band, FCC Rule 15.323(d): - Continued

Please refer to the attached plots for more details:

Base Unit - Model: LS6225-2

Plot B4A1: Lowest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

Plot B4B1: Highest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

Plot B4C1: Lowest Channel Unwanted Emission Inside the Sub-Band (Dummy Carrier)

Plot B4D1: Highest Channel Unwanted Emission Inside the Sub-Band (Dummy Carrier)

Base Unit - Model: LS6215-2

Plot B4A2: Lowest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

Plot B4B2: Highest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

Plot B4C2: Lowest Channel Unwanted Emission Inside the Sub-Band (Dummy Carrier)

Plot B4D2: Highest Channel Unwanted Emission Inside the Sub-Band (Dummy Carrier)

Handset:

Plot H4A: Lowest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

Plot H4B: Highest Channel Unwanted Emission Inside the Sub-Band (Traffic Carrier)

The plots of the unwanted emission inside the sub-band are saved as filename:  
inband.pdf

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.5 Emissions Outside the Sub-Band, FCC Rule 15.323(d):

Emissions outside the sub-band shall be attenuated below a reference power of 112 mW (20.5 dBm) as follows:

1. 30 dB between the band edge and 1.25 MHz above or below the band;
2. 50 dB between 1.25 and 2.5 MHz above or below the band; and
3. 60 dB at 2.5 MHz or greater above or below the band, or shall not exceed the limits of FCC Rule 15.209.

Example: Calculation of Limit for emissions between the band edge and 1.25 MHz (1920.000 – 1918.750 MHz)

The emissions shall not exceed the Limit: 20.5 dBm – 30 dB = -9.5 dBm

Measurements are made in accordance with ANSI C63.17 sub-clause 6.1.6.2. As EUT has non-detachable antenna(s), radiated emissions test method is used for out-of-band emissions tests. Emissions that are directly caused by digital circuits in the transmit path and transmitter portion are measured. Test setup and procedures are described in section 3.2 Figure 3.2.1.

### Test Results:

#### Base Unit & Handset:

Channel	Carrier Frequency (MHz)	Measured Band (MHz)	Limit (dBm)	Results
Lowest	1921.536	1920.000 - 1918.750	-9.5	Pass
		1918.750 - 1917.500	-29.5	Pass
		0.009 - 1917.500 & 1932.500 - 19300.000	-39.5 / FCC Rule 15.209	Pass
Highest	1928.448	1930.000 - 1931.250	-9.5	Pass
		1931.250 - 1932.500	-29.5	Pass
		0.009 - 1917.500 & 1932.500 - 19300.000	-39.5 / FCC Rule 15.209	Pass

Please refer to the section 4.5.1 to 4.5.4 for more details.

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6215-2, LS6225-2

Mode: Transmission

### 4.5.1 Radiated Emissions Configuration Photographs:

Worst Case Radiated Emission  
at

Base Unit for LS6225-2: 7713.792 MHz & 7686.144 MHz

Base Unit for LS6215-2: 7686.144 MHz

Handset: 5764.608 MHz

The worst case radiated emission configuration photographs are saved as filename:  
config photos.pdf

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2  
Mode: Transmission

Date of Test: December 6-16, 2008

### 4.5.2 Radiated Emissions Data:

Data are included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included. All measurements were performed with peak detection unless otherwise specified.

The data in tables 1-15 list the significant emission frequencies, the limit and the margin of compliance.

### Judgement -

Base Unit for LS6225-2: Passed by 6.4 dB margin compare with the average limit

Base Unit for LS6215-2: Passed by 7.0 dB margin compare with the average limit

Handset: Passed by 6.5 dB margin compare with the peak limit

### **TEST ENGINEER:**



---

Signature

Ken Sit, Assistant Manager  
Typed/Printed Name

January 20, 2009  
Date

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6225-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 1, Base Unit

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Lowest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1919.850	-42.6	-9.5	-33.1
V	1918.086	-46.8	-29.5	-17.3
V	1917.101	-52.0	-39.5	-12.5

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.  
Model: LS6225-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 2, Base Unit

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Lowest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	62.1	33	33.3	62.4	15.6	46.8	54.0	-7.2
H	5764.608	54.8	33	36.6	58.4	15.6	42.8	54.0	-11.2
H	7686.144	57.3	33	38.9	63.2	15.6	47.6	54.0	-6.4
H	9607.680	52.2	33	40.4	59.6	15.6	44.0	54.0	-10.0
H	11529.216	53.3	33	40.5	60.8	15.6	45.2	54.0	-8.8

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	62.1	33	33.3	62.4	74.0	-11.6
H	5764.608	54.8	33	36.6	58.4	74.0	-15.6
H	7686.144	57.3	33	38.9	63.2	74.0	-10.8
H	9607.680	52.2	33	40.4	59.6	74.0	-14.4
H	11529.216	53.3	33	40.5	60.8	74.0	-13.2

#### NOTES:

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6225-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 3, Base Unit

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Highest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.014	-42.8	-9.5	-33.3
V	1931.692	-46.9	-29.5	-17.4
V	1933.472	-52.2	-39.5	-12.7

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6225-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 4, Base Unit

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Highest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	62.1	33	33.3	62.4	15.6	46.8	54.0	-7.2
H	5785.344	54.8	33	36.6	58.4	15.6	42.8	54.0	-11.2
H	7713.792	57.3	33	38.9	63.2	15.6	47.6	54.0	-6.4
H	9642.240	52.2	33	40.4	59.6	15.6	44.0	54.0	-10.0
H	11570.688	53.3	33	40.5	60.8	15.6	45.2	54.0	-8.8

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	62.1	33	33.3	62.4	74.0	-11.6
H	5785.344	54.8	33	36.6	58.4	74.0	-15.6
H	7713.792	57.3	33	38.9	63.2	74.0	-10.8
H	9642.240	52.2	33	40.4	59.6	74.0	-14.4
H	11570.688	53.3	33	40.5	60.8	74.0	-13.2

NOTES:

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6225-2

Mode: Talk

Table 5, Base Unit

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	56.900	-61.2	-39.5	-21.7
V	113.800	-61.4	-39.5	-21.9
H	170.700	-62.3	-39.5	-22.8
H	227.600	-62.4	-39.5	-22.9
H	284.500	-62.8	-39.5	-23.3
H	341.400	-63.6	-39.5	-24.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 6, Base Unit

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Lowest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1919.852	-43.1	-9.5	-33.6
V	1918.086	-46.7	-29.5	-17.2
V	1917.101	-51.6	-39.5	-12.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.  
Model: LS6215-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 7, Base Unit

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Lowest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	61.8	33	33.3	62.1	15.6	46.5	54.0	-7.5
H	5764.608	53.8	33	36.6	57.4	15.6	41.8	54.0	-12.2
H	7686.144	56.7	33	38.9	62.6	15.6	47.0	54.0	-7.0
H	9607.680	52.0	33	40.4	59.4	15.6	43.8	54.0	-10.2
H	11529.216	52.7	33	40.5	60.2	15.6	44.6	54.0	-9.4

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	61.8	33	33.3	62.1	74.0	-11.9
H	5764.608	53.8	33	36.6	57.4	74.0	-16.6
H	7686.144	56.7	33	38.9	62.6	74.0	-11.4
H	9607.680	52.0	33	40.4	59.4	74.0	-14.6
H	11529.216	52.7	33	40.5	60.2	74.0	-13.8

#### NOTES:

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6215-2

Mode: Transmission

Table 8, Base Unit

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Highest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.014	-42.8	-9.5	-33.3
V	1931.684	-46.9	-29.5	-17.4
V	1933.476	-52.0	-39.5	-12.5

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.  
Model: LS6215-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 9, Base Unit

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Highest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	61.7	33	33.3	62.0	15.6	46.4	54.0	-7.6
H	5785.344	54.0	33	36.6	57.6	15.6	42.0	54.0	-12.0
H	7713.792	56.6	33	38.9	62.5	15.6	46.9	54.0	-7.1
H	9642.240	52.0	33	40.4	59.4	15.6	43.8	54.0	-10.2
H	11570.688	52.8	33	40.5	60.3	15.6	44.7	54.0	-9.3

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	61.7	33	33.3	62.0	74.0	-12.0
H	5785.344	54.0	33	36.6	57.6	74.0	-16.4
H	7713.792	56.6	33	38.9	62.5	74.0	-11.5
H	9642.240	52.0	33	40.4	59.4	74.0	-14.6
H	11570.688	52.8	33	40.5	60.3	74.0	-13.7

#### NOTES:

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6215-2

Mode: Talk

Table 10, Base Unit

**Radiated Emissions Data  
Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	55.304	-61.4	-39.5	-21.9
V	82.956	-61.6	-39.5	-22.1
H	110.608	-62.3	-39.5	-22.8
H	138.260	-62.6	-39.5	-23.1
H	165.912	-62.8	-39.5	-23.3
H	193.564	-63.6	-39.5	-24.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6225-2, LS6215-2

Mode: Transmission

Table 11, Handset

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Lowest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1919.850	-42.8	-9.5	-33.3
V	1918.085	-46.8	-29.5	-17.3
V	1917.102	-51.4	-39.5	-11.9

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.  
 Model: LS6225-2, LS6215-2  
 Mode: Transmission

Date of Test: December 6-16, 2008

Table 12, Handset

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Lowest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	58.3	33	33.3	58.6	28.2	30.4	54.0	-23.6
H	5764.608	63.9	33	36.6	67.5	28.2	39.3	54.0	-14.7
H	7686.144	59.5	33	38.9	65.4	28.2	37.2	54.0	-16.8
H	9607.680	57.8	33	40.4	65.2	28.2	37.0	54.0	-17.0
H	11529.216	51.1	33	40.5	58.6	28.2	30.4	54.0	-23.6

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3843.072	58.3	33	33.3	58.6	74.0	-15.4
H	5764.608	63.9	33	36.6	67.5	74.0	-6.5
H	7686.144	59.5	33	38.9	65.4	74.0	-8.6
H	9607.680	57.8	33	40.4	65.2	74.0	-8.8
H	11529.216	51.1	33	40.5	58.6	74.0	-15.4

**NOTES:**

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6225-2, LS6215-2

Mode: Transmission

Table 13, Handset

**Radiated Emissions Data**  
**Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Highest Channel:

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	1930.014	-42.9	-9.5	-33.4
V	1931.685	-47.0	-29.5	-17.5
V	1933.476	-51.6	-39.5	-12.1

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

## INTERTEK TESTING SERVICES

Company: VTech Telecommunications Ltd.  
Model: LS6225-2, LS6215-2  
Mode: Transmission

Date of Test: December 6-16, 2008

Table 14, Handset

### Radiated Emissions Data Pursuant To FCC Part 15 Section 15.209 Emissions Requirements

Highest Channel:

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Average Factor (dB)	Calculated at 3m (dB $\mu$ V/m)	Average Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	58.3	33	33.3	58.6	28.2	30.4	54.0	-23.6
H	5785.344	59.3	33	36.6	62.9	28.2	34.7	54.0	-19.3
H	7713.792	59.7	33	38.9	65.6	28.2	37.4	54.0	-16.6
H	9642.240	58.0	33	40.4	65.4	28.2	37.2	54.0	-16.8
H	11570.688	51.7	33	40.5	59.2	28.2	31.0	54.0	-23.0

Polarization	Frequency (MHz)	Reading (dB $\mu$ V)	Pre-Amp Gain (dB)	Antenna Factor (dB)	Net at 3m - Peak (dB $\mu$ V/m)	Peak Limit at 3m (dB $\mu$ V/m)	Margin (dB)
H	3856.896	58.3	33	33.3	58.6	74.0	-15.4
H	5785.344	59.3	33	36.6	62.9	74.0	-11.1
H	7713.792	59.7	33	38.9	65.6	74.0	-8.4
H	9642.240	58.0	33	40.4	65.4	74.0	-8.6
H	11570.688	51.7	33	40.5	59.2	74.0	-14.8

#### NOTES:

1. Peak detector is used for the emission measurement over 1000 MHz.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6225-2, LS6215-2  
Mode: Talk

Date of Test: December 6-16, 2008

Table 15, Handset

**Radiated Emissions Data  
Pursuant To FCC Part 15 Section 15.323 (d) Emissions Requirements**

Polarization	Frequency (MHz)	Measured Power (dBm)	Power Limit (dBm)	Margin (dB)
V	56.900	-61.1	-39.5	-21.6
V	113.800	-61.6	-39.5	-22.1
H	170.700	-62.0	-39.5	-22.5
H	227.600	-62.6	-39.5	-23.1
H	284.500	-62.8	-39.5	-23.3
H	341.400	-63.4	-39.5	-23.9

NOTES:

1. Peak detector is used for the emission measurement.
2. All measurements were made at 3 meters.
3. Negative value in the margin column shows emission below limit.

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## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.5.3 Field Strength Calculation

The field strength is calculated by adding the reading on the Spectrum Analyzer to the factors associated with preamplifiers (if any), antennas, cables, pulse desensitization and average factors (when specified limit is in average and measurements are made with peak detectors). A sample calculation is included below.

$$FS = RA + AF + CF - AG + PD + AV$$

Where

- FS = Field Strength in dB $\mu$ V/m
- RA = Receiver Amplitude (including preamplifier) in dB $\mu$ V
- CF = Cable Attenuation Factor in dB
- AF = Antenna Factor in dB
- AG = Amplifier Gain in dB
- PD = Pulse Desensitization in dB
- AV = Average Factor in -dB

In the radiated emission table which follows, the reading shown on the data table may reflect the preamplifier gain. An example of the calculations, where the reading does not reflect the preamplifier gain, follows:

$$FS = RA + AF + CF - AG + PD + AV$$

#### Example

Assume a receiver reading of 62.0 dB $\mu$ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29.0 dB is subtracted. The pulse desensitization factor of the spectrum analyzer is 0.0 dB, and the resultant average factor is -10.0 dB. The net field strength for comparison to the appropriate emission limit is 32.0 dB $\mu$ V/m. This value in dB $\mu$ V/m is converted to its corresponding level in  $\mu$ V/m.

RA = 62.0 dB $\mu$ V  
AF = 7.4 dB  
CF = 1.6 dB  
AG = 29.0 dB  
PD = 0.0 dB  
AV = -10 dB

$$FS = 62.0 + 7.4 + 1.6 - 29.0 + 0.0 + (-10.0) = 32.0 \text{ dB}\mu\text{V/m}$$

$$\text{Level in mV/m} = \text{Common Antilogarithm} [(32.0 \text{ dB}\mu\text{V/m})/20] = 39.8 \mu\text{V/m}$$

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.5.4 Average Factor Calculation and Transmitter ON Time Measurements, FCC Rule 15.35(b), (c)

Base Unit: (for four handsets, single-slot operation with dummy)

$$\begin{aligned}\text{Duty cycle (DC)} &= \text{Maximum ON time in 10ms/10ms} \\ &= (4 \times 1 \times 0.388\text{ms} + 0.102\text{ms})/10\text{ms}\end{aligned}$$

$$\begin{aligned}\text{Average Factor (AF), dB} &= 20 \times \log(\text{DC}) \\ &= 20 \times \log(0.1654) \\ &= -15.6\text{dB}\end{aligned}$$

Handset: (for single-slot operation)

$$\begin{aligned}\text{Duty cycle (DC)} &= \text{Maximum ON time in 10ms/10ms} \\ &= (1 \times 0.388\text{ms})/10\text{ms}\end{aligned}$$

$$\begin{aligned}\text{Average Factor (AF), dB} &= 20 \times \log(\text{DC}) \\ &= 20 \times \log(0.0388) \\ &= -28.2\text{dB}\end{aligned}$$

[ x ] The EUT antenna output port was connected to the input of the spectrum analyzer. The analyzer center frequency was set to EUT RF channel carrier. The SPAN function on the analyzer was set to ZERO. The transmitter ON time was determined from the resultant time-amplitude display:

Please refer to the attached plots for more details:

Base Unit:

Plot B5A: Transmitter ON Time Measurements (Traffic Carrier)

Plot B5B: Transmitter ON Time Measurements (Dummy Carrier)

Handset

Plot H5A: Transmitter ON Time Measurements (Traffic Carrier)

The plots of Transmitter ON Time Measurements are saved as filename: txon.pdf

[ ] Please refer to the attached transmitter timing diagram that are provided by manufacturer

[ ] Not applicable - No average factor is required.

[ ] Please refer to Exhibit 2.2 Technical Description for more details

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.6 AC Power Lines Conducted Emissions from Transmitter portion of EUT, FCC Rule 15.315:

The AC power lines conducted emission shall not exceed the limits of FCC Rule 15.207.

Measurements are made in accordance with ANSI C63.4 sub-clause 7. Emissions that are directly caused by digital circuits in the transmit path and transmitter portion are measured.

- Not applicable – EUT is only powered by battery for operation.
- EUT connects to AC power lines. Emission Data are listed in following pages. Please refer to the section 4.6.1 to 4.6.2 for more details.

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2  
Mode: Talk

Date of Test: December 6-16, 2008

### 4.6.1 AC Power Lines Conducted Emissions Configuration Photographs:

#### Worst Case AC Power Line Conducted Emission

The worst case AC power Line conducted emission configuration photographs are saved as filename: config photos.pdf

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.

Date of Test: December 6-16, 2008

Model: LS6215-2, LS6225-2

Mode: Talk

### 4.6.2 AC Power Line Conducted Emissions Data:

The data on the following pages list the significant emission frequencies, the limit, and the margin of compliance.

Judgment: Passed by more than 20 dB margin

The worst case AC power line conducted emission data are saved as filename: conduct.pdf

### **TEST ENGINEER:**



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*Signature*

Ken Sit, Assistant Manager

*Typed/Printed Name*

January 20, 2009

*Date*

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.7 Radio Frequency Radiation Exposure, FCC Rule 15.319(i):

EUT is subject to the radio frequency exposure requirements specified in FCC Rule §§ 1.1307(b), 2.1091 and 2.1093. It shall be considered to operate in a “general population / uncontrolled” environment.

- [ x ] Base Unit: EUT was evaluated for Maximum Permissible Exposure (MPE) evaluation compliance according to OET Bulletin 65, Supplement C (Edition 01-01). The evaluation calculation results are saved as filename: RF exposure info.pdf.
- [ x ] Handset Unit: EUT was evaluated for Specific Absorption Rate (SAR) evaluation compliance according to OET Bulletin 65, Supplement C (Edition 01-01). It is in compliance with the SAR evaluation requirements. The caution statement specified in the user manual. A SAR test report was submitted at the same time and saved as SAR Report.pdf

## INTERTEK TESTING SERVICES

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Company: VTech Telecommunications Ltd.  
Model: LS6215-2, LS6225-2

Date of Test: December 6-16, 2008

### 4.8 Monitoring Antenna, FCC Rule 15.323(c)(8):

The monitoring system shall use the same antenna used for transmission, or an antenna that yields equivalent reception at that location.

- EUT uses the same antenna used for transmission and monitoring that is in compliance meet above provision.
- EUT uses difference antenna used for transmission and monitoring. It must be verified that the monitoring antenna provides coverage equivalent to that of the transmitting antenna. Measurements are made in accordance with ANSI C63.17 sub-clause 4.