

# REGULATORY COMPLIANCE REPORT

**TITLE:** FCC & ISSED Test Report for 15.247 & RSS-210 Frequency Hopping Device  
Itron RIVAW external antenna on Plastic Lid

**AUTHOR:** Roger Mulcahy

REV	CCO	DESCRIPTION OF CHANGE	DATE	APPROVALS	
001c		upload c	04apr17	Engineering	Roger Mulcahy
				Regulatory	

## REVISION HISTORY

				Engineering	
				Regulatory	
				Engineering	
				Regulatory	
				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 15.247 / ISSED RSS-247; Frequency Hopping Transmitter;

RIVAW Water endpoint, 902.2MHz – 927.75 MHz for EUT – Plastic Lid Antenna

FCC ID:EWQRIVAWA;

IC:864D-RIVAWA

HVINs: RIVAWA and RIVAWRA

Rule	Description	Spec Limit	Max. Reading	Pass/ Fail
Part 15.247(d) / RSS 247 5.5 RSS GEN 8.9	Spurious Emissions – radiated	< -20dBc	47.2 dBuV/m @ 1855.5MHz / -52.4 dBc power level 1 AM 66.62dBuV/m @ 1853.6 MHz/ -48.97dBc power level 3 AM 70.51 dBuV/m @1855.5 MHz / -50.3dBc power level 3 FM10	Pass
Parts 15.247(d), 15.205 & 15.209 (radiated) / RSS-GEN 8.10 and RSS-247 sec 5.5	Restricted Bands / Spurious Emissions – radiated	table	49.25 dBuV/m @ 5418MHz power level 1 AM 47.88QP dbuV/m @ 960.39 MHz power level 3 AM 37.76 dBuV/m @ 2745MHz power level 3 FM10	Pass
RSS-Gen 7 Part 15.109 Class B	Receiver Spurious Emissions - radiated	table	34dBuV/m (noise floor)	Pass

Rule versions: FCC Part 1; FCC Part 2; FCC Part 15, RSS-102 Issue 5 (03-2015); RSS-Gen Issue 4 (11-2014); RSS-247 Issue 2 (02-2017)

Method of Measurement: ANSI C63.4-2014; ANSI C63.10-2013;

Reference docs: DA 00-705 (03-30-2000); OET65 (08-1997); OET65C (06-2001); IEEE C95.3-2002. RSP100 issue11; SDR KDB 442812 D01 (07-2014); Exposure KDB 227498D01 (02-2014)

Cognizant Personnel	
<u>Name</u> Roger Mulcahy	<u>Title</u> Test Technician
<u>Name</u> Jay Holcomb	<u>Title</u> Regulatory
<u>Name</u> Nate Van Roekel	<u>Title</u> Project Lead

**CONDITIONS DURING TESTING**

No Modifications to the EUT were necessary during the testing.

**FCC 15.31(m) – ISED n/a ; Number of Channels**

This device was tested on three channels.

**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-sGen 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.
Itron Model:	Itron RIVAW Endpoint
Serial Number(s)	Antenna 12203611, RIVAWA 123456789
Power source	Fresh Batteries

**Plot Information**

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

**Peripheral Devices**

None

**Test Conditions Setup**

The external antenna EUT was mounted in a Plastic water meter pit lid above the endpoint device, on the test site turntable.

# 15.247(d) / RSS-247 5.5 and RSS GEN 8.9

## Spurious Emissions - Radiated

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
Agilent E4440A Spectrum Analyzer	MY45305142	4/18/2016	4/18/2017
Emco 6502 Loop (9kHz to 30MHz)	9509-2970	3/3/2016	3/3/2018
Emco 3110B Biconical (30MHz-to 300MHz)	9203-2455	1/10/2017	1/10/2019
Emco 3115 waveguide (1Ghz - 18GHz)	9205-3878	3/7/2016	3/7/2018
EMCO 3146 Log periodic (200MHz to 1GHz)	9203-3358	1/10/2017	4/29/2017
Huber Suhner 40 foot cable	N/A	4/29/2016	12/16/2017
1.3Ghz high pass filter	405734	12/16/2016	12/16/2017
AH systems preamplifier model number PAM 0126	146	1/12/2017	1/12/2018
Microcoax 3 foot cable	N/A	12/16/2016	12/16/2017
Date	Tested by		
March 18 through 19, 2017	Roger Mulcahy		

Unit tested: with a fresh battery 65

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

## AM power level 1

1	2	3	4	5	6	7	8	9	10
Freq. MHz	Ant. Pos. Vert. or Horiz.	Antenna Height / Table Azimuth	Level dBm	Cable Loss dB	Ant. Factor dB/m	Amplifier Gain dB	peak corrected Level dBuV/m	emissions dBc	Margin dB
926.8	Vertical	100/210	-32.62	3	22.2	N/A	99.58		
5490	Horizontal	155/240	-65.61	7.69	34.05	35.91	<b>47.22</b>	<b>-52.36</b>	32.36
5560.8	Horizontal	180/240	-66.67	7.74	33.97	35.94	46.10	-53.48	33.48
1806	Vertical	190/90	-58.33	4.38	26.77	36.81	43.01	-56.57	36.57
1853.6	Vertical	200/280	-61.28	4.44	27.03	36.72	40.47	-59.11	39.11
1830	Vertical	180/90	-61.1	4.41	26.9	36.76	40.45	-59.13	39.13
1806	Horizontal	195/90	-61.24	4.38	26.77	36.81	40.10	-59.48	39.48

[8] = [4] + [5] + [6] - [7]+107; [9] = [8] - Power Out first rows; [10] = -20 - [9]

AM power level 3

1	2	3	4	5	6	7	8	9	10
Freq. MHz	Ant. Pos. Vert. or Horz.	Antenna Height / Table Azimuth	Level dBm	Cable Loss dB	Ant. Factor dB/m	Amplifier Gain dB	peak corrected Level dBuV/m	emissions dBc	Margin dB
915	Vertical	115/200	-16.99	2.98	22.6	N/A	115.59		
1853.6	Vertical	185/260	-35.13	4.44	27.03	36.72	<b>66.62</b>	<b>-48.97</b>	28.97
1830	Vertical	170/260	-36.8	4.41	26.9	36.76	64.75	-50.84	30.84
1806	Vertical	180/260	-37.15	4.38	26.77	36.81	64.19	-51.4	31.4
1806	Horizontal	256/30	-39.8	4.38	26.77	36.81	61.54	-54.05	34.05
1830	Horizontal	250/100	-41.58	4.41	26.9	36.76	59.97	-55.62	35.62
1853.6	Horizontal	270/30	-43.03	4.44	27.03	36.72	58.72	-56.87	36.87

[8] = [4] + [5] + [6] - [7]+107; [9] = [8] - Power Out first rows; [10] = -20 - [9]

FM 10kbps power level 3

1	2	3	4	5	6	7	8	9	10
Freq. MHz	Ant. Pos. Vert. or Horz.	Antenna Height / Table Azimuth	Level dBm	Cable Loss dB	Ant. Factor dB/m	Amplifier Gain dB	peak corrected Level dBuV/m	emissions dBc	Margin dB
915	Vertical	100/290	-11.77	2.98	22.6	N/A	120.81		
1855.5	Vertical	180/265	-31.25	4.44	27.04	36.81	<b>70.51</b>	<b>-50.3</b>	30.3
1830	Vertical	185/265	-33.11	4.41	26.9	36.72	68.44	-52.37	32.37
1804.4	Vertical	185/265	-33.36	4.38	26.76	36.76	67.97	-52.84	32.84
1804.4	Horizontal	256/30	-42.27	4.38	26.76	36.72	58.63	-62.18	42.18
1855.5	Horizontal	270/30	-43.97	4.44	27.04	36.81	58.21	-62.6	42.6
1830	Horizontal	250/100	-43.55	4.41	26.9	36.76	57.58	-63.23	43.23

[8] = [4] + [5] + [6] - [7]+107; [9] = [8] - Power Out first rows; [10] = -20 - [9]

**15.247 (d), 15.205, 15.209(Radiated) / RSS-247 5.5, RSS-GEN 8.10**

**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 and B 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
Agilent E4440A Spectrum Analyzer	MY45305142	4/18/2016	4/18/2017
Emco 6502 Loop (9kHz to 30MHz)	9509-2970	3/3/2016	3/3/2018
Emco 3110B Biconical (30MHz-to 300MHz)	9203-2455	1/10/2017	1/10/2019
Emco 3115 waveguide (1Ghz - 18GHz)	9205-3878	3/7/2016	3/7/2018
EMCO 3146 Log periodic (200MHz to 1GHz)	9203-3358	1/10/2017	4/29/2017
Huber Suhner 40 foot cable	N/A	4/29/2016	12/16/2017
1.3Ghz high pass filter	405734	12/16/2016	12/16/2017
AH systems preamplifier model number PAM 0126	146	1/12/2017	1/12/2018
Microcoax 3 foot cable	N/A	12/16/2016	12/16/2017
Date	Tested by		
March 18 through 19, 2017	Roger Mulcahy		

Unit tested: with a fresh battery 65

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

AM Mode, power level 1

1	2	3	4	5	6	7	8	9	10	11	12	13
---	---	---	---	---	---	---	---	---	----	----	----	----

Ant.	VBW	10Hz	VBW	VBW	Corr	Factor						
Pos.	RBW	RBW	Peak	Corrected	Peak	Peak	Corrected	Average	Average	Average		
Freq.	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level
horz.	dBm	dBm	dB	dB/m	dB	dBuV/m	dBuV/m	dB	dBuV/m	dBuV/m	dB	dB
5418	Horizontal	-63.39		7.64	33.96	35.96	<b>49.25</b>	74	24.75	<b>30.95</b>	54	23.05
5418	Vertical	-67.28		7.64	33.96	35.96	45.36	74	28.64	27.06	54	26.94
4515	Vertical	-66.27		7	32.22	36.24	43.71	74	30.29	25.41	54	28.59
2709	Vertical	-66.03		5.41	28.73	48.74	26.37	74	47.63	8.07	54	45.93
2780.6	Vertical	-66.81		5.48	28.91	48.83	25.75	74	48.25	7.45	54	46.55
2745	Vertical	-66.82		5.44	28.82	48.83	25.61	74	48.39	7.31	54	46.69

[8] = [3]+[5]+[6]-[7]; [9] from table above; [10] = [9] - [8]  
[11] = [4]+[5]+[6]+[7]+107 - \* Duty Cycle Corr. Factor; [12] from table above; [13] = [12] - [11]  
[10] = [9]-[8]  
Note: Level (dBm) + 107 = (dBuV) @ 50 ohm

#### AM Mode, power level 3

1	2	3	4	5	6	7	8	9	10	11	12	13
Ant.	VBW	10Hz	VBW	VBW	Corr	Factor						
Pos.	RBW	RBW	Peak	Corrected	Peak	Peak	Corrected	Average	Average	Average		
Freq.	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level
horz.	dBm	dBm	dB	dB/m	dB	dBuV/m	dBuV/m	dB	dBuV/m	dBuV/m	dB	dB
960.39	vert	-79.01	-86.18	3.06	24	N/A	<b>55.05</b>			<b>47.88 QP</b>	54	6.12
2709	Vertical	-67.65		5.41	28.73	36.53	36.96	74	37.04	31.94	54	22.06
2780.4	Vertical	-68.91		5.48	28.9	36.43	36.04	74	37.96	31.02	54	22.98
2745	Vertical	-68.53		5.44	28.82	36.48	36.25	74	37.75	31.23	54	22.77
2745	Horizontal	-73		5.44	28.82	36.48	31.78	74	42.22	26.76	54	27.24
2780.4	Horizontal	-73.2		5.48	28.9	36.43	31.75	74	42.25	26.73	54	27.27

#### FM 10kbps power level 3

1	2	3	4	5	6	7	8	9	10	11	12	13
Ant.	VBW	10	Hz	VB	W	VBW	Corr	Factor				
Pos.	RBW	RBW	Peak	Corrected	Peak	Peak	Corrected	Average*	Average	Average		
Freq.	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level	Level
horz.	dBm	dBm	dB	dB/m	dB	dBuV/m	dBuV/m	dB	dBuV/m	dBuV/m	dB	dB
2745	Vertical	-67.02		5.44	28.82	36.48	<b>37.76</b>	74	<b>36.24</b>		54	16.24
2783.25	Vertical	-68.75		5.49	28.91	36.42	36.23	74	37.77		54	17.77
2706.6	Vertical	-68.67		5.41	28.72	36.53	35.93	74	38.07		54	18.07
2745	Horizontal	-72.1		5.44	28.82	36.48	32.68	74	41.32		54	21.32
2783.25	Horizontal	-72.25		5.49	28.91	36.42	32.73	74	41.27		54	21.27
2706.6	Horizontal	-73.22		5.41	28.72	36.53	31.38	74	42.62		54	22.62

## **RSS-Gen 7 and Part 15.109 Class B 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.

Unit tested: 69501161 with a fresh battery

**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 30MHz to 5 GHz.

Equipment Used	Serial Number	Cal Date	Due
Agilent E4440A Spectrum Analyzer	MY45305142	4/18/2016	4/18/2017
Emco 3110B Biconical (30MHz-to 300MHz)	9203-2455	1/10/2017	1/10/2019
Emco 3115 waveguide (1Ghz - 18GHz)	9205-3878	3/7/2016	3/7/2018
EMCO 3146 Log periodic (200MHz to 1GHz)	9203-3358	1/10/2017	4/29/2017
Huber Suhner 40 foot cable	N/A	4/29/2016	12/16/2017
1.3Ghz high pass filter	405734	12/16/2016	12/16/2017
AH systems preamplifier model number PAM 0126	146	1/12/2017	1/12/2018
Microcoax 3 foot cable	N/A	12/16/2016	12/16/2017
Date	Tested by		
March 19, 2017	Roger Mulcahy		

Frequency range investigated was 30MHz to 5 GHz. Emissions from the Receiver were below the noise floor.

No emissions found noise floor is 34dbuV/m



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

(ANSI references updated however)

note: for reference only, now ANSI C63.4-2014 and ANSI C63.10-2013 are used.

**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 ≥ 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 ≥ RBW

Sweep = auto

Detector function = peak

Trace = max hold

Follow the guidelines in ANSI C63.4-2003 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 C63.4-2003 (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.

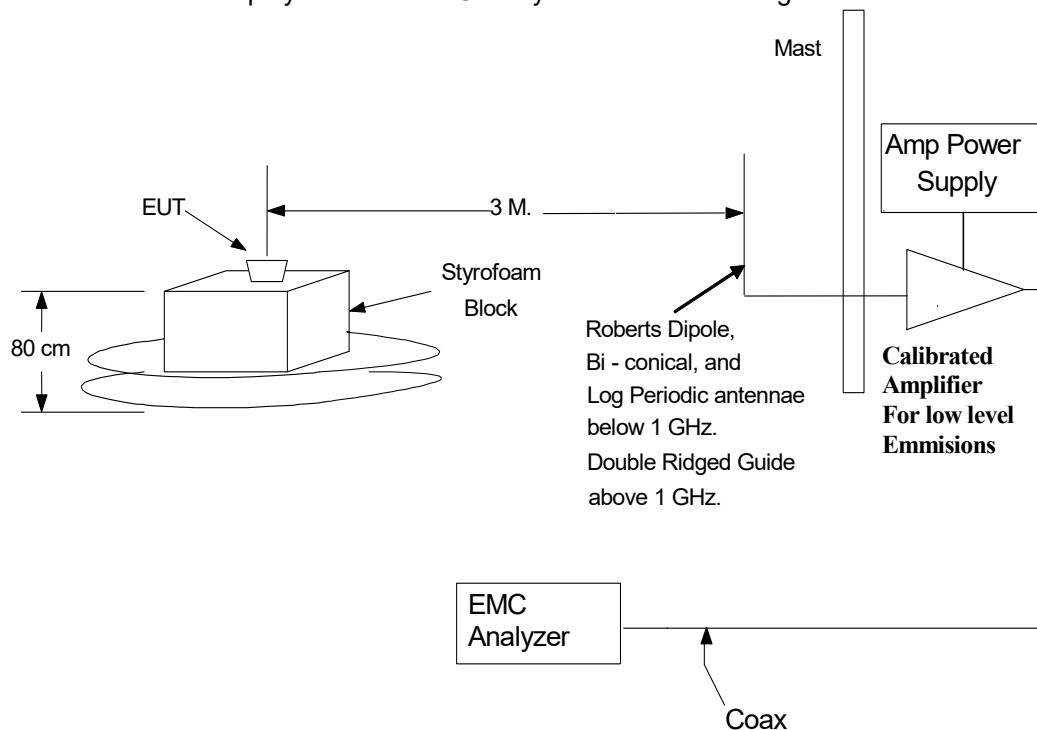
STEP 3) Subtract the delta measured in step (2) from the field strengths measured in step (1). The resultant field strengths (CISPR QP, average, or peak, as appropriate) are then used to determine band-edge compliance as required by Section 15.205.

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 BField 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.