



## ROGERS LABS, INC.

4405 West 259th Terrace Louisburg, KS 66053 Phone / Fax (913) 837-3214

## Application For Grant of Certification

47 CFR, PART 15C - Intentional Radiators 47 CFR Paragraph 15.249 and Industry Canada RSS-GEN Issue 5 and RSS-210 Issue 10

> Model: A03915 2402-2480 MHz (DXX) Low Power Digital Transmitter

> > FCC ID: IPH-03915 IC: 1792A-03915

# Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

FCC Designation: US5305 ISED Registration: 3041A-1 Test Report Number: 191105

Test Date: November 05, 2019

Authorized Signatory: Sot DRogers

Scot D. Rogers

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Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053

Revision 1

Garmin International, Inc. Model: A03915 Test: 191105

SN's: 3303700951, 3303700953 FCC ID: IPH-03915 IC: 1792A-03915

Phone/Fax: (913) 837-3214 Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020

File: A03915 DXX TstRpt 191105 Page 1 of 37



Revision 1

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## **Revisions**

Revision 1 Issued January 29, 2020

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#### Foreword

The following information is submitted for consideration in obtaining Grant of Certification for low power intentional radiator per the eCFR Title 47 Federal Communications Code of Federal Regulations (47 CFR), dated November 05, 2019, Industry Canada RSS-210 Issue 10 and RSS-GEN Issue 5, low power digital device transmitter operations in the 2400 – 2483.5 MHz frequency band.

Name of Applicant: Garmin International, Inc.

1200 East 151st Street Olathe, KS 66062

M/N: A03915

FCC ID: IPH-03915 IC: 1792A-03915 Operating Frequency Range: 2402-2480 MHz

#### Operational communication modes

Mode	Peak Power (dBµV/m@3m)	Average power (dBµV/m@3m)	99% OBW (kHz)
Mode 1 (GFSK)	98.9	91.5	870.2
Mode 2 (GFSK)	99.0	94.0	879.8

This report addresses EUT Operations as Low Power Device using Modes 1 and 2 (GFSK)

## Opinion / Interpretation of Results

Tests Performed	Margin (dB)	Results
Restricted Bands 47 CFR 15.205, RSS-210 4.1	-7.4	Complies
AC Line Conducted 47 CFR 15.207, RSS-GEN 8.8	N/A	Complies
Radiated Emissions 47 CFR 15.209, RSS-GEN 8.9	-8.3	Complies
Harmonic Emissions per 47 CFR 15.249, RSS-210 B.10	-4.3	Complies

Rogers Labs, Inc. Garmin International, Inc. SN's: 3303700951, 3303700953 4405 West 259<sup>th</sup> Terrace Model: A03915 FCC ID: IPH-03915

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## **Equipment Tested**

Model: A03915

 Equipment
 Model / PN
 Serial Number

 EUT #1
 A03915
 3303700951

 EUT #2
 A03915
 3303700953

 Portable Navigation Device
 AA3111
 3314005152

Wiring Harness Manufacturer provided N/A
DC Bench Power Supply BK1745 209C13

Test results in this report relate only to the items tested

#### Operational communication modes

Mode	Transmitter Operation and Modulation
1	2402-2480 MHz, ANT (GFSK)
2	2402-2480 MHz, BT BR (GFSK)
3	2402-2480 MHz, BT 2EDR (π/4 DQPSK)
4	2402-2480 MHz, BT 3EDR (8DPSK)
5	2412-2462 MHz, 802.11b (CCK)
6	2412-2462 MHz, 802.11g (OFDM)
7	2412-2462 MHz, 802.11n (MCS)

Software Version used during testing 0.21, Power setting: modes 1 & 2 (0 dBm), modes 3 & 4 (6 dBm), modes 5-7, (0 dBm)

This report documents operation in modes 1 and 2 as Low Power Device (DXX). Test results in this report relate only to the items tested.

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#### **Equipment Function**

The EUT is a Mobile mounted docking platform providing interface for supported digital display. The display is required to interact with and control the EUT. The design provides a docking station for a portable navigation device (PND) touch screen display and unique connection points for associated audio and video equipment. The design requires direct current power provided from the installation vehicle to operate. The device offers no other interface options than those presented below in the configuration diagram. The design has transmitters providing operational capability across the 2402-2480 MHz frequency band. The design provides wireless communications with compatible GFSK,  $\pi/4$  DQPSK, 8DPSK modulation devices in the 2402-2480 MHz band as well as DSSS, OFDM, and MCS modulation devices in the 2412-2462 MHz band. The design utilizes internal fixed antenna systems and offers no provision for antenna replacement or modification. Two samples were provided for testing, one representative of production design, and the other modified for testing purposes replacing the integral antennas with RF connection ports. The test samples were provided with test software as defined above enabling testing personnel the ability to operate transmitter functions on defined modulations and channels. The test software enabled near 100% transmit duty cycle for testing purposes. The antenna modification offered testing facility the ability to connect test equipment to the temporary test antenna ports. The EUT was arranged as described by the manufacturer emulating typical user configurations for testing purposes. For testing purposes, the EUT received powered from external Bench DC power supply and configured to operate in available modes. As requested by the manufacturer and required by regulations, the equipment was tested for compliance using the available configurations with the worst-case data presented. This report documents the performed testing and results for applicable configurations and product modes of operation. Test results in this report relate only to the products described in this report.

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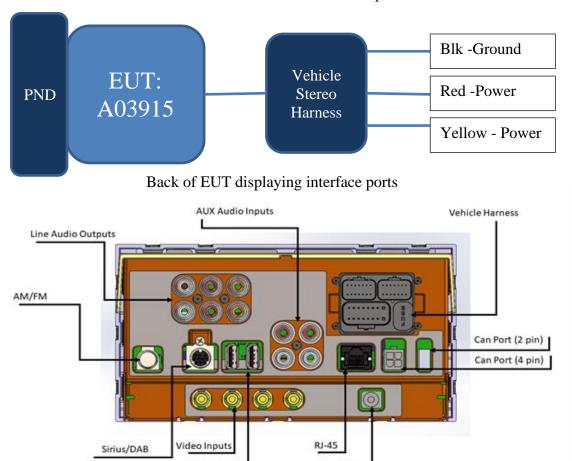
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#### **Equipment Configuration**

1) Unit operating from External Direct Current Power Supply (connected to Vehicle harness, Harness connected to power (10.8~16VDC; 14.4VDC typical); Black wire, "GROUND" = Ground/Common Yellow wire, "POWER" = Power/14.4VDC Red wires, "IGNITION" & "HOUSE" = one or both connected to power



Loads were provided to exercise the unit, but none of the following are required for core functionality and will be optional to customers. Tested using all for worst case unit implementation.

**USB Ports** 

Connector Name	Provided Load/Note
Line Audio Outputs	75-ohm loads (common with others)
AM/FM	75-ohm coax load on standard Motorola connector
Sirius/DAB	Sirius XM accessory, keyed to proprietary connector
Mic	Supplied microphone to 3.5mm jack
USB ports	USB thumb drive and resistive load
Video Inputs	75-ohm loads (common with others)
RJ-45	Ethernet cable
CAN Ports	NMEA backbone connecting both ports (120-ohm termination)
Vehicle Harness	Supplied, keyed connectors for utilized signals including: 4-ohm loads for speakers, 75-ohm loads (common) for additional line outs, GPIO & ADC signals grounded
AUX Audio Inputs	75-ohm loads (common with others)

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## **Application for Certification**

(1) Manufacturer: Garmin International, Inc.

1200 East 151st Street

Olathe, KS 66062

(2) Identification: M/N: A03915

FCC ID: IPH-03915 IC: 1792A-03915

(3) Instruction Book:

Refer to Exhibit for Instruction Manual.

(4) Description of Circuit Functions:

Refer to Exhibit of Operational Description.

(5) Block Diagram with Frequencies:

Refer to Exhibit of Operational Description.

(6) Report of Measurements:

Report of measurements follows in this Report.

(7) Photographs: Construction, Component Placement, etc.:

Refer to Exhibit for photographs of equipment.

- (8) List of Peripheral Equipment Necessary for operation. The equipment operates from direct current power provided from Installation Vehicle battery. The design provides interface options with compatible audio and video equipment as presented in this filing. The EUT offers no other connection ports than those presented in this filing.
- (9) Transition Provisions of 47 CFR 15.37 are not requested.
- (10) Not Applicable. The unit is not a scanning receiver.
- (11) Not Applicable. The EUT does not operate in the 59 64 GHz frequency band.
- (12) The equipment is not software defined and this section is not applicable.
- (13) Applications for certification of U-NII devices in the 5.15-5.35 GHz and the 5.47-5.85 GHz bands must include a high-level operational description of the security procedures that control the radio frequency operating parameters and ensure that unauthorized modifications cannot be made. This requirement is not applicable to his DTS device.
- (14) Contain at least one drawing or photograph showing the test set-up for each of the required types of tests applicable to the device for which certification is requested. These drawings or photographs must show enough detail to confirm other information contained in the test report. Any photographs used must be focused originals without glare or dark spots and must clearly show the test configuration used. This information is provided in this report and Test Setup Exhibits provided with the application filing.

Rogers Labs, Inc. Garmin International, Inc. SN's: 3303700951, 3303700953 4405 West 259<sup>th</sup> Terrace Model: A03915 FCC ID: IPH-03915

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## **Applicable Standards & Test Procedures**

The following information is submitted in accordance with the eCFR Title 47 Federal Communications Code of Federal Regulations (47 CFR), dated November 05, 2019: Part 2, Subpart J, Paragraphs 2.907, 2.911, 2.913, 2.925, 2.926, 2.1031 through 2.1057, and applicable parts of paragraph 15, Part 15C Paragraph 15.249, Industry Canada RSS-210 Issue 10, and RSS-GEN Issue 5 operation in the 2400 – 2483.5 MHz Frequency band. Test procedures used are the established Methods of Measurement of Radio-Noise Emissions as described in ANSI C63.10-2013.

### **Testing Procedures**

#### AC Line Conducted Emission Test Procedure

The equipment operates solely from direct current power and offers no provision for connection to utility power systems. Therefore, no AC line conducted emissions testing was required or performed.

#### Radiated Emission Test Procedure

Radiated emissions testing was performed as required in 47 CFR 15C, RSS-210 and specified in ANSI C63.10-2013. The EUT was placed on a rotating 0.9 x 1.2-meter platform, elevated as required above the ground plane at a distance of 3 meters from the FSM antenna. EMI energy was maximized by equipment placement permitting orientation in three orthogonal axes, raising and lowering the FSM antenna, changing the antenna polarization, and by rotating the turntable. Each emission was maximized before data was taken and recorded. The frequency spectrum from 9 kHz to 25,000 MHz was searched for emissions during preliminary investigation. Refer to diagrams one and two showing typical test setup. Refer to photographs in the test setup exhibits for specific EUT placement during testing.

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#### Antenna Port Conducted Emission Test Procedure

The EUT was assembled as required for operation placed on a benchtop. This configuration provided the ability to connect test equipment to the provided test antenna port Antenna Port conducted emissions testing was performed presented in the regulations and specified in ANSI C63.10-2013. Testing was completed on a laboratory bench in a shielded room. The active antenna port of the device was connected to appropriate attenuation and the spectrum analyzer. Refer to diagram three showing typical test arrangement and photographs in the test setup exhibits for specific EUT placement during testing.

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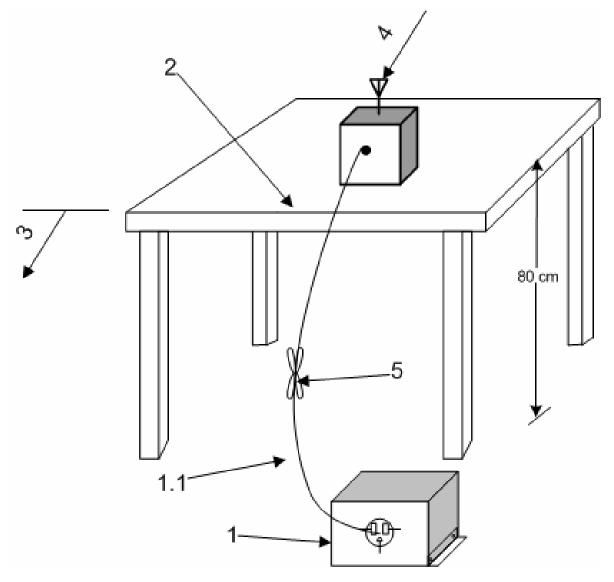
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- 1—A LISN is optional for radiated measurements between 30 MHz and 1000 MHz but not allowed for measurements below 30 MHz and above 1000 MHz (see 6.3.1). If used, then connect EUT to one LISN. Unused LISN measuring port connectors shall be terminated in 50  $\Omega$  loads. The LISN may be placed on top of, or immediately beneath, the reference ground plane (see 6.2.2 and 6.2.3.2).
- 1.1—LISN spaced at least 80 cm from the nearest part of the EUT chassis.
- 2—Antenna can be integral or detachable, depending on the EUT (see 6.3.1).
- 3—Interconnecting cables that hang closer than 40 cm to the ground plane shall be folded back and forth in the center forming a bundle 30 cm to 40 cm long (see 6.3.1).
- 4—For emission measurements at or below 1 GHz, the table height shall be 80 cm. For emission measurements above 1 GHz, the table height shall be 1.5 m for measurements, except as otherwise specified (see 6.3.1 and 6.6.3.1).

#### Diagram 1 Test arrangement for radiated emissions of tabletop equipment

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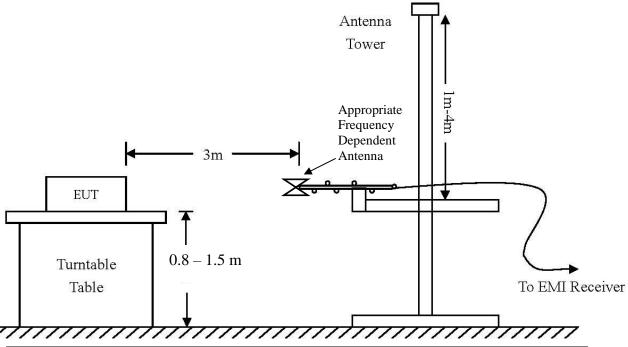
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AC Line Conducted Emissions (0.150 -30 MHz)								
RBW	RBW AVG. BW Detector Function							
9 kHz	30 kHz	Peak / Quasi Peak						
	Emissions (30-1000 MHz)							
RBW	AVG. BW	Detector Function						
120 kHz	120 kHz 300 kHz Peak / Quas							
	Emissions (Above 1000 MHz)							
RBW	Video BW	Detector Function						
100 kHz 100 kHz Peak								
1 MHz	1 MHz	Peak / Average						

Diagram 2 Test arrangement for radiated emissions tested on Open Area Test Site (OATS)

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## Spectrum Analyzer

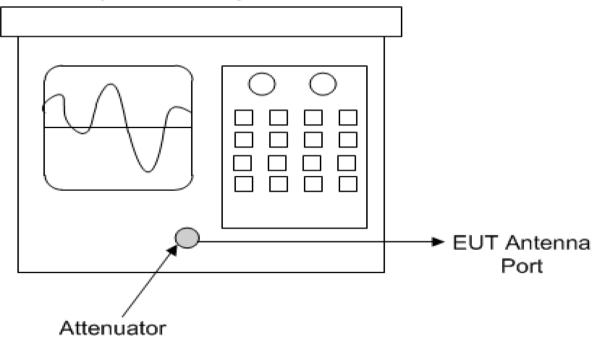


Diagram 3 Test arrangement for Antenna Port Conducted emissions

#### **Test Site Locations**

Conducted EMI AC line conducted emissions testing performed in a shielded screen room

located at Rogers Labs, Inc., 4405 West 259th Terrace, Louisburg, KS

Antenna port Antenna port conducted emissions testing was performed in a shielded

screen room located at Rogers Labs, Inc., 4405 West 259th Terrace,

Louisburg, KS

Radiated EMI The radiated emissions tests were performed at the 3 meters, Open Area

Test Site (OATS) located at Rogers Labs, Inc., 4405 West 259th Terrace,

Louisburg, KS

Registered Site information: FCC Site: US5305, ISED: 3041A, CAB Identifier: US0096

NVLAP Accreditation Lab code 200087-0

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## **List of Test Equipment**

Equipment	Manufacturer	Model (SN)	Band C	al Date(m/d/y	) Due
□ LISN	FCC FCC-LIS	SN-50-25-10(1PA) (160611)	.15-30MHz	4/18/2019	4/18/2020
$\square$ LISN	Compliance Design	FCC-LISN-2.Mod.cd,(126)	.15-30MHz	10/14/2019	10/14/2020
⊠ Cable	Huber & Suhner Inc.	Sucoflex102ea(L10M)(3030'	73)9kHz-40 GHz	10/14/2019	10/14/2020
⊠ Cable	Huber & Suhner Inc.	Sucoflex102ea(1.5M)(30306	9)9kHz-40 GHz	10/14/2019	10/14/2020
⊠ Cable	Huber & Suhner Inc.	Sucoflex102ea(1.5M)(30307	1)9kHz-40 GHz	10/14/2019	10/14/2020
$\square$ Cable	Belden	RG-58 (L1-CAT3-11509)	9kHz-30 MHz	10/14/2019	10/14/2020
$\square$ Cable	Belden	RG-58 (L2-CAT3-11509)	9kHz-30 MHz	10/14/2019	10/14/2020
	Com Power	AL-130 (121055)	.001-30 MHz	10/14/2019	10/14/2020
☐ Antenna:	EMCO	6509	.001-30 MHz	10/16/2018	10/16/2020
☐ Antenna	ARA	BCD-235-B (169)	20-350MHz	10/14/2019	10/14/2020
☐ Antenna:	Schwarzbeck Model	BBA 9106/VHBB 9124 (912	24-627)	4/18/2019	4/18/2021
	Sunol	JB-6 (A100709)	30-1000 MHz	10/14/2019	10/14/2020
☐ Antenna	ETS-Lindgren	3147 (40582)	200-1000MHz	10/14/2019	10/14/2020
☐ Antenna:	Schwarzbeck Model	: VULP 9118 A (VULP 9118	A-534)	4/18/2019	4/18/2021
	ETS-Lindgren	3117 (200389)	1-18 GHz	5/02/2019	5/2/2020
☐ Antenna	Com Power	AH-118 (10110)	1-18 GHz	10/14/2019	10/14/2020
	Com Power	AH-840 (101046)	18-40 GHz	4/18/2019	4/18/2021
	Rohde & Schwarz	ESU40 (100108)	20Hz-40GHz	4/18/2019	4/18/2020
	Rohde & Schwarz	ESW44 (101534)	20Hz-44GHz	1/31/2019	1/31/2020
$\square$ Analyzer	Rohde & Schwarz	FS-Z60, 90, 140, and 220	40GHz-220GHz	12/22/2017	12/22/2027
	Com-Power	PA-010 (171003)	100Hz-30MHz	10/14/2019	10/14/2020
	Com-Power	CPPA-102 (01254)	1-1000 MHz	10/14/2019	10/14/2020
	Com-Power	PAM-118A (551014)	0.5-18 GHz	10/14/2019	10/14/2020
	Com-Power	PAM-840A (461328)	18-40 GHz	10/14/2019	10/14/2020
☐ Power Mete	rAgilent	N1911A with N1921A	0.05-40 GHz	4/18/2019	4/18/2020
$\square$ Generator	Rohde & Schwarz	SMB100A6 (100150)	20Hz-6 GHz	4/18/2019	4/18/2020
☐ Generator	Rohde & Schwarz	SMBV100A6 (260771)	20Hz-6 GHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRC50722 (009).9G notch	$30\text{-}18000~\mathrm{MHz}$	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50114 (017)1.5G HPF	$30\text{-}18000~\mathrm{MHz}$	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50117 (063) 3G HPF	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	HPM50105 (059) 6G HPF	30-18000 MHz	4/18/2019	4/18/2020
☐ RF Filter	Micro-Tronics	BRM50702 (172) 2G notch	30-18000 MHz	4/18/2019	4/18/2020
$\square$ RF Filter	Micro-Tronics	BRC50703 (G102) 5G notch	30-18000 MHz	4/18/2019	4/18/2020
$\square$ RF Filter	Micro-Tronics	BRC50705 (024) 5G notch	30-18000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Fairview	SA6NFNF100W-40 (1625)	30-18000 MHz	4/18/2019	4/18/2020
	Mini-Circuits	VAT-3W2+ (1436)	30-6000 MHz	4/18/2019	4/18/2020
$\square$ Attenuator	Mini-Circuits	VAT-3W2+ (1445)	30-6000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/18/2019	4/18/2020
$\square$ Attenuator	Mini-Circuits	VAT-6W2+ (1438)	30-6000 MHz	4/18/2019	4/18/2020
☐ Attenuator	Mini-Circuits	VAT-6W2+ (1736)	30-6000 MHz	4/18/2019	4/18/2020
⊠ Weather sta	tion Davis	6312 (A81120N075)		11/4/2019	11/4/2020

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#### **Units of Measurements**

Conducted EMI Data presented in dBµV; dB referenced to one microvolt

Antenna port Conducted Data is in dBm; dB referenced to one milliwatt

Radiated EMI Data presented in dBµV/m; dB referenced to one microvolt per meter

Note: Radiated limit may be expressed for measurement in  $dB\mu V/m$  when the measurement is taken at a distance of 3 or 10 meters. Data taken for this report was taken at distance of 3 meters. Sample calculation demonstrates corrected field strength reading for Open Area Test Site using the measurement reading and correcting for receive antenna factor, cable losses, and amplifier gains.

#### Sample Calculation:

RFS = Radiated Field Strength, FSM = Field Strength Measured

A.F. = Receive antenna factor, Losses = attenuators/cable losses, Gain = amplification gains

RFS  $(dB\mu V/m @ 3m) = FSM (dB\mu V) + A.F. (dB/m) + Losses (dB) - Gain (dB)$ 

#### **Environmental Conditions**

Ambient Temperature 21.1° C

Relative Humidity 29 %

Atmospheric Pressure 1031.8 mb

#### **Statement of Modifications and Deviations**

No modifications to the EUT were required for the equipment to demonstrate compliance with the 47 CFR Part 15C, 15.249, Industry Canada RSS-210 Issue 10, and RSS-GEN Issue 5 emission requirements. There were no deviations to the specifications.

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 Test: 191105
 IC: 1792A-03915

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#### Intentional Radiators

The following information is submitted supporting compliance with the requirements of 47 CFR, Subpart C, paragraph 15.249, Industry Canada RSS-210 Issue 10 and RSS-GEN Issue 5.

#### Antenna Requirements

The EUT incorporates integral antenna system. Production equipment offers no provision for connection to alternate antenna system. The antenna connection point complies with the unique antenna connection requirements. There are no deviations or exceptions to the specification.

#### Restricted Bands of Operation

Spurious emissions falling in the restricted frequency bands of operation were measured at the OATS. The EUT utilizes frequency, determining circuitry, which generates harmonics falling in the restricted bands. Emissions were investigated at the OATS, using appropriate antennas or pyramidal horns, amplification stages, and a spectrum analyzer. Peak and average amplitudes of frequencies above 1000 MHz were compared to the required limits with worst-case data presented below. Test procedures of ANSI C63.10-2013 were used during testing. No other significant emission was observed which fell into the restricted bands of operation. Computed emission values take into account the received radiated field strength, receive antenna correction factor, amplifier gain stage, and test system cable losses.

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Table 1 Radiated Emissions in Restricted Frequency Bands Data Mode 1 ANT (GFSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
2390.0	44.5	31.0	44.2	31.3	54.0	-23.0	-22.7
2483.5	47.0	33.6	46.0	32.8	54.0	-20.4	-21.2
4804.0	49.5	36.4	48.8	36.1	54.0	-17.6	-17.9
4920.0	48.8	35.9	48.2	35.9	54.0	-18.1	-18.1
4960.0	48.9	36.2	49.4	36.3	54.0	-17.8	-17.7
7206.0	55.0	44.1	53.8	41.7	54.0	-9.9	-12.3
7380.0	52.4	39.9	54.0	42.0	54.0	-14.1	-12.0
7440.0	54.8	41.0	54.4	42.3	54.0	-13.0	-11.7
12010.0	59.7	46.6	58.7	45.4	54.0	-7.4	-8.6
12300.0	59.5	46.4	60.0	46.3	54.0	-7.6	-7.7
12400.0	59.1	46.1	59.1	46.3	54.0	-7.9	-7.7

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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Table 2 Radiated Emissions in Restricted Frequency Bands Data Mode 2 BT BR (GFSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
2390.0	44.3	31.1	43.9	31.2	54.0	-22.9	-22.8
2483.5	47.5	33.7	51.0	32.6	54.0	-20.3	-21.4
4804.0	49.4	36.4	49.0	36.2	54.0	-17.6	-17.8
4882.0	48.7	35.9	48.8	35.9	54.0	-18.1	-18.1
4960.0	50.3	36.3	49.5	36.4	54.0	-17.7	-17.6
7206.0	55.2	44.2	54.2	41.8	54.0	-9.8	-12.2
7323.0	52.9	39.9	54.1	41.9	54.0	-14.1	-12.1
7440.0	53.6	41.1	53.7	42.4	54.0	-12.9	-11.6
12010.0	58.2	45.3	58.3	45.5	54.0	-8.7	-8.5
12205.0	58.2	46.0	58.6	46.2	54.0	-8.0	-7.8
12400.0	59.1	46.1	59.1	46.3	54.0	-7.9	-7.7

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

#### Summary of Results for Radiated Emissions in Restricted Bands

The EUT demonstrated compliance with the radiated emissions requirements of 47 CFR Part 15C and RSS-210 Issue 10 Intentional Radiator requirements. The EUT demonstrated a worst-case minimum margin of -7.4 dB below the emissions requirements in restricted frequency bands. Peak, Quasi-peak, and average amplitudes were checked for compliance with the regulations. Worst-case emissions are reported with other emissions found in the restricted frequency bands at least 20 dB below the requirements.

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#### General Radiated Emissions Procedure

The EUT was arranged in a typical equipment configuration and operated through all available mode during testing. Preliminary testing was performed in a screen room with the EUT positioned 1 meter from the FSM. Radiated emissions measurements were performed to identify the frequencies, which produced the highest emissions. Each radiated emission was then maximized at the OATS location before final radiated measurements were performed. Final data was taken with the EUT located on the OATS at 3 meters distance between the EUT and the receiving antenna. The frequency spectrum from 9 kHz to 25,000 MHz was searched for general radiated emissions. Measured emission levels were maximized by EUT placement on the table, rotating the turntable through 360 degrees, varying the antenna height between 1 and 4 meters above the ground plane and changing antenna position between horizontal and vertical polarization. Antennas used were Loop from 9 kHz to 30 MHz, Broadband Biconical from 30 to 200 MHz, Biconilog from 30 to 1000 MHz, Log Periodic from 200 MHz to 1 GHz and or double Ridge or pyramidal horns and mixers above 1 GHz, notch filters and appropriate amplifiers and external mixers were utilized.

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**Table 3 General Radiated Emissions Data** 

Frequency (MHz)	Horizontal Peak (dBµV/m)	Horizontal Quasi-Peak (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Quasi-Peak (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dBm)	Vertical Margin (dBm)
48.0	31.6	29.1	35.6	31.7	40.0	-10.9	-8.3
58.0	28.8	21.7	30.8	26.4	40.0	-18.3	-13.6
72.5	32.5	26.1	32.7	27.1	40.0	-13.9	-12.9
120.0	35.0	31.0	34.4	29.4	40.0	-9.0	-10.6
137.9	29.3	24.1	28.4	23.7	40.0	-15.9	-16.3
143.2	28.9	23.9	26.9	20.9	40.0	-16.1	-19.1
145.0	28.8	23.5	28.3	21.3	40.0	-16.5	-18.7
214.2	26.8	21.9	27.1	20.4	40.0	-18.1	-19.6

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

#### Summary of Results for General Radiated Emissions

The EUT demonstrated compliance with the radiated emissions requirements of 47 CFR Part 15C paragraph 15.209, RSS-210 Issue 10, and RSS-GEN Issue 5 Intentional Radiators. The EUT demonstrated a minimum margin of -8.3 dB below the requirements. Other emissions were present with amplitudes at least 20 dB below the Limits.

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#### Operation in the Band 2400 – 2483.5 MHz

The transmitter output power; harmonic and general emissions were measured on an open area test site @ 3 meters. The EUT was placed on a turntable elevated as required above the ground plane and at a distance of 3 meters from the FSM antenna. The peak and quasi-peak amplitude of frequencies below 1000 MHz were measured using a spectrum analyzer. The peak and average amplitude of frequencies above 1000 MHz were measured using a spectrum analyzer. The amplitude of each emission was then recorded from the analyzer display. Emissions radiated outside of the specified bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits, whichever is the lesser attenuation. Antenna port emission plots were taken of transmitter performance for reference in this and other documentation using test sample #2. The amplitude of each radiated emission was measured on the OATS at a distance of 3 meters from the FSM antenna testing was performed on sample representative of production with integral antenna (sample #1) with worst-case data provided. The amplitude of each radiated emission was maximized by equipment orientation and placement on the turn table, raising and lowering the FSM (Field Strength Measuring) antenna, changing the FSM antenna polarization, and by rotating the turntable. A Loop antenna was used for measuring emissions from 0.009 to 30 MHz, Biconilog Antenna for 30 to 1000 MHz, Double-Ridge, and/or Pyramidal Horn Antennas from 1 GHz to 25 GHz. Emissions were measured in dBµV/m @ 3 meters.

Refer to figures one through eight showing plots taken of the 2402-2480 MHz transmitter operation displaying compliance with the specifications.

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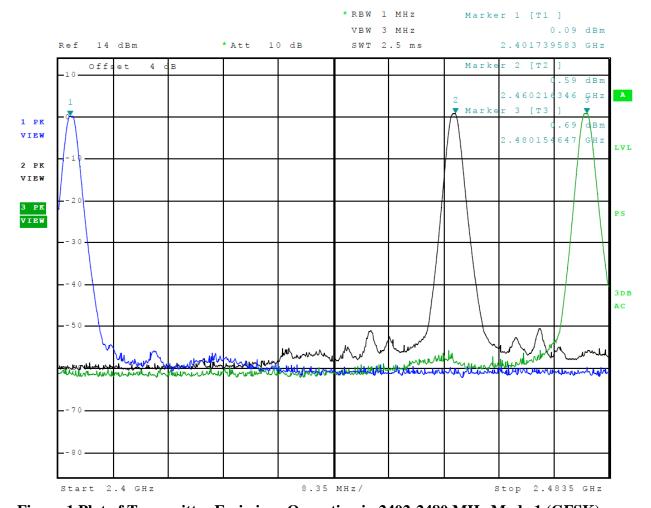


Figure 1 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 1 (GFSK)

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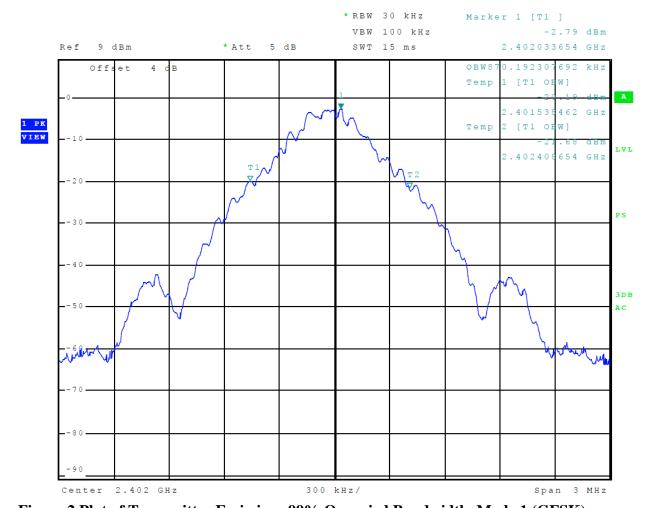


Figure 2 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 1 (GFSK)

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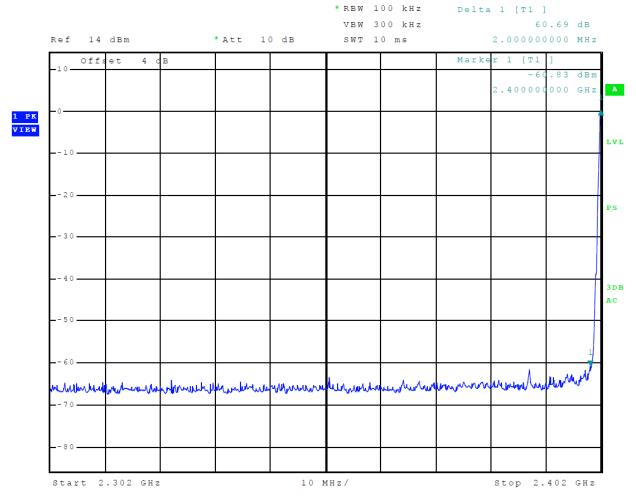


Figure 3 Plot of Transmitter Emissions Low Band Edge Mode 1 (GFSK)

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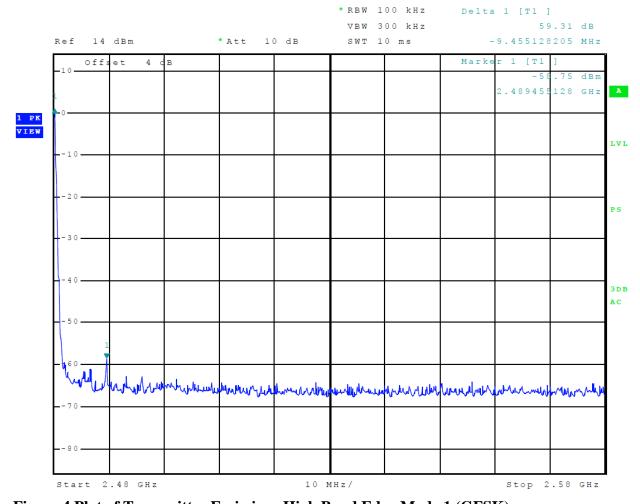


Figure 4 Plot of Transmitter Emissions High Band Edge Mode 1 (GFSK)

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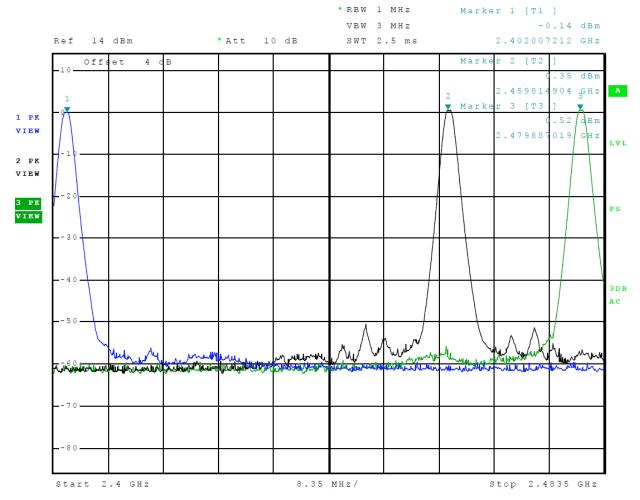


Figure 5 Plot of Transmitter Emissions Operation in 2402-2480 MHz Mode 2 (GFSK)

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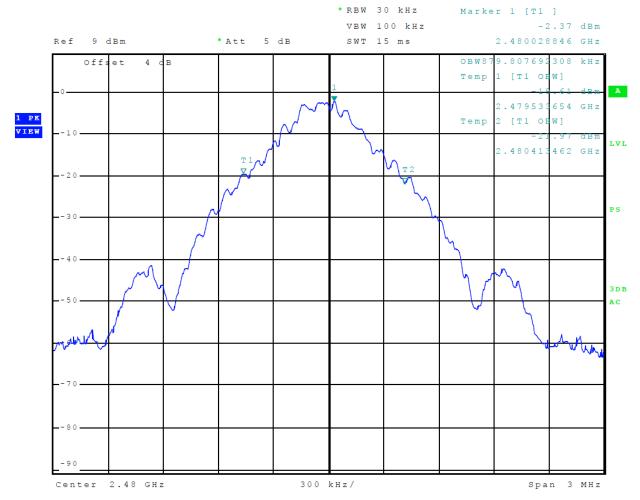


Figure 6 Plot of Transmitter Emissions 99% Occupied Bandwidth Mode 2 (GFSK)

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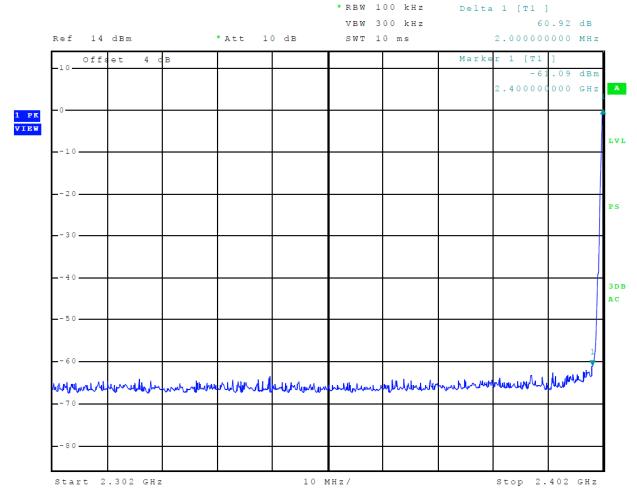


Figure 7 Plot of Transmitter Emissions Low Band Edge Mode 2 (GFSK)

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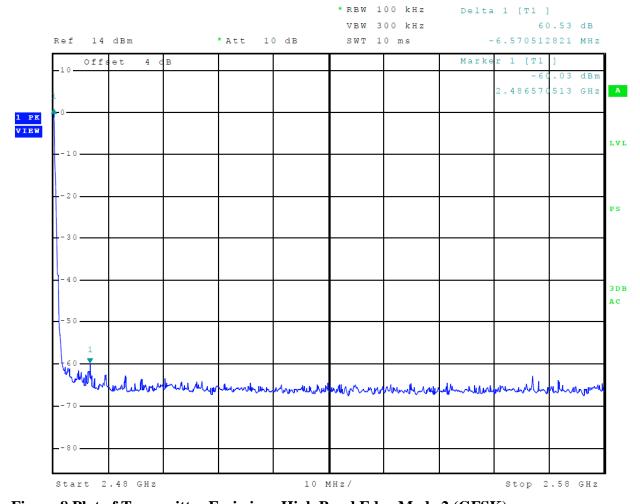


Figure 8 Plot of Transmitter Emissions High Band Edge Mode 2 (GFSK)

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#### Transmitter Emissions Data

#### Table 4 Transmitter Radiated Emissions Mode 1 (GFSK)

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2402.0	94.9	87.4	94.3	86.7	94.0	-6.6	-7.3
4804.0	49.5	36.4	48.8	36.1	54.0	-17.6	-17.9
7206.0	55.0	44.1	53.8	41.7	54.0	-9.9	-12.3
9608.0	56.5	44.4	56.7	43.3	54.0	-9.6	-10.7
12010.0	59.7	46.6	58.7	45.4	54.0	-7.4	-8.6
14412.0	61.9	48.9	61.5	48.0	54.0	-5.1	-6.0
16814.0	62.7	49.7	61.7	48.9	54.0	-4.3	-5.1
2460.0	97.9	90.5	94.5	87.1	94.0	-3.5	-6.9
4920.0	48.8	35.9	48.2	35.9	54.0	-18.1	-18.1
7380.0	52.4	39.9	54.0	42.0	54.0	-14.1	-12.0
9840.0	55.8	43.1	56.9	43.6	54.0	-10.9	-10.4
12300.0	59.5	46.4	60.0	46.3	54.0	-7.6	-7.7
14760.0	61.9	48.6	61.5	48.7	54.0	-5.4	-5.3
17220.0	61.6	49.0	61.6	48.9	54.0	-5.0	-5.1
2480.0	98.9	91.5	95.6	88.3	94.0	-2.5	-5.7
4960.0	48.9	36.2	49.4	36.3	54.0	-17.8	-17.7
7440.0	54.8	41.0	54.4	42.3	54.0	-13.0	-11.7
9920.0	55.8	42.3	55.8	42.7	54.0	-11.7	-11.3
12400.0	59.1	46.1	59.1	46.3	54.0	-7.9	-7.7
14880.0	60.5	48.1	60.7	48.1	54.0	-5.9	-5.9
17360.0	61.2	48.4	61.9	48.4	54.0	-5.6	-5.6

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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**Table 5 Transmitter Radiated Emissions Mode 2 (GFSK)** 

Frequency in MHz	Horizontal Peak (dBµV/m)	Horizontal Average (dBµV/m)	Vertical Peak (dBµV/m)	Vertical Average (dBµV/m)	Limit @ 3m (dBµV/m)	Horizontal Margin (dB)	Vertical Margin (dB)
2402.0	95.0	90.4	94.3	89.7	94.0	-3.6	-4.3
4804.0	49.4	36.4	49.0	36.2	54.0	-17.6	-17.8
7206.0	55.2	44.2	54.2	41.8	54.0	-9.8	-12.2
9608.0	56.7	44.4	55.9	43.3	54.0	-9.6	-10.7
12010.0	58.2	45.3	58.3	45.5	54.0	-8.7	-8.5
14412.0	60.7	47.9	61.0	47.9	54.0	-6.1	-6.1
16814.0	62.5	49.6	62.7	49.5	54.0	-4.4	-4.5
2441.0	98.0	93.6	94.4	90.2	94.0	-0.4	-3.8
4882.0	48.7	35.9	48.8	35.9	54.0	-18.1	-18.1
7323.0	52.9	39.9	54.1	41.9	54.0	-14.1	-12.1
9764.0	56.3	43.0	56.5	43.7	54.0	-11.0	-10.3
12205.0	58.2	46.0	58.6	46.2	54.0	-8.0	-7.8
14646.0	60.7	48.2	61.3	48.2	54.0	-5.8	-5.8
17087.0	61.8	49.3	62.0	49.4	54.0	-4.7	-4.6
2480.0	99.0	94.0	95.7	91.2	94.0	0.0	-2.8
4960.0	50.3	36.3	49.5	36.4	54.0	-17.7	-17.6
7440.0	53.6	41.1	53.7	42.4	54.0	-12.9	-11.6
9920.0	55.3	42.3	55.5	42.6	54.0	-11.7	-11.4
12400.0	59.1	46.1	59.1	46.3	54.0	-7.9	-7.7
14880.0	60.6	48.0	60.6	48.0	54.0	-6.0	-6.0
17360.0	61.0	48.4	61.1	48.3	54.0	-5.6	-5.7

Other emissions present had amplitudes at least 20 dB below the limit. Peak and Quasi-Peak amplitude emissions are recorded for frequency range below 1000 MHz. Peak and Average amplitude emissions are recorded for frequency range above 1000 MHz.

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#### Summary of Results for Transmitter Radiated Emissions of Intentional Radiator

The EUT demonstrated compliance with the radiated emissions requirements of FCC 47 CFR Part 15.249, Industry Canada RSS-210 Issue 10 and RSS-GEN Issue 5 Intentional Radiator regulations. The EUT worst-case test sample configuration demonstrated minimum average margin of -0 dB below the average emission limit for the fundamental. The EUT worst-case configuration demonstrated minimum radiated harmonic emission margin of -4.3 dB below the limit. No other radiated emissions were found in the restricted bands less than 20 dB below limits than those recorded in this report. Other emissions were present with amplitudes at least 20 dB below the limits.

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#### Annex

- Annex A Measurement Uncertainty Calculations
- Annex B Additional Test Equipment List
- Annex C Rogers Qualifications
- Annex D Rogers Labs Certificate of Accreditation

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Garmin International, Inc. Model: A03915

Test: 191105

Test to: CFR47 15.249, RSS-210, RSS-Gen Date: January 29, 2020 File: A03915 DXX TstRpt 191105

SN's: 3303700951, 3303700953 FCC ID: IPH-03915

IC: 1792A-03915

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#### Annex A Measurement Uncertainty Calculations

The measurement uncertainty was calculated for all measurements listed in this test report according To CISPR 16–4. Result of measurement uncertainty calculations are recorded below. Component and process variability of production devices similar to those tested may result in additional deviations. The manufacturer has the sole responsibility of continued compliance.

Measurement	Expanded Measurement Uncertainty U <sub>(lab)</sub>		
3 Meter Horizontal 0.009-1000 MHz Measurements	4.16		
3 Meter Vertical 0.009-1000 MHz Measurements	4.33		
3 Meter Measurements 1-18 GHz	5.14		
3 Meter Measurements 18-40 GHz	5.16		
10 Meter Horizontal Measurements 0.009-1000 MHz	4.15		
10 Meter Vertical Measurements 0.009-1000 MHz	4.32		
AC Line Conducted	1.75		
Antenna Port Conducted power	1.17		
Frequency Stability	1.00E-11		
Temperature	1.6°C		
Humidity	3%		

Rogers Labs, Inc. 4405 West 259<sup>th</sup> Terrace Louisburg, KS 66053 Phone/Fax: (913) 837-3214

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## Annex B Additional Test Equipment

List of Test Eq	uipment		Calibration <u>l</u>	Date (m/d/y)	<u>Due</u>				
☐ Frequency (	Counter: Leader LDC-	-825 (8060153		4/18/2019	4/18/2021				
☐ LISN: Fisch	4/18/2019	4/18/2020							
$\square$ Cable	Huber & Suhner Inc	s. Sucoflex102ea(1.5M)(3030	70) 9kHz-40 GH	z 10/14/2019	10/14/2020				
$\square$ Cable	Huber & Suhner Inc	. Sucoflex102ea(1.5M)(3030	72) 9kHz-40 GH	z 10/14/2019	10/14/2020				
$\square$ Cable	Huber & Suhner Inc	z 10/14/2019	10/14/2020						
$\square$ Cable	Huber & Suhner Inc	. Sucoflex102ea(L10M)(317:	546)9kHz-40 GH	z 10/14/2019	10/14/2020				
$\square$ Cable	Time Microwave	4M-750HF290-750 (4M)	9kHz-24 GH	z 10/14/2019	10/14/2020				
☐ RF Filter	Micro-Tronics	BRC17663 (001) 9.3-9.5 no	otch 30-1800 MH	z 4/18/2019	4/18/2020				
☐ RF Filter	Micro-Tronics	BRC19565 (001) 9.2-9.6 no	otch 30-1800 MH	z 10/16/2018	4/18/2020				
☐ Attenuator	Mini-Circuits	VAT-3W2+ (1735)	30-6000 MHz	4/18/2019	4/18/2020				
$\square$ Analyzer	HP	8562A (3051A05950)	9kHz-125GHz	4/18/2019	4/18/2020				
$\square$ Analyzer	HP External Mixers	11571, 11970	25GHz-110GH	z 4/18/2015	4/18/2025				
$\square$ Analyzer	HP	8591EM (3628A00871)		5/2/2018	5/2/2020				
$\square$ LISN	Com-Power	LI-550C (20140004&5)	.1-108MHz	10/14/2019	10/14/2020				
☐ Antenna: S	olar 9229-1 & 9230-1			2/22/2019	2/22/2020				
☐ R.F. Genera	4/18/2019	4/18/2020							
☐ R.F. Genera	4/18/2019	4/18/2020							
☐ R.F. Power	2/22/2019	2/22/2020							
☐ R.F. Power	2/22/2019	2/22/2020							
☐ R.F. Power	2/22/2019	2/22/2020							
☐ LISN: Com-	10/14/2019	10/14/2020							
☐ LISN: Com	4/18/2019	4/18/2020							
☐ LISN: Fisch	4/18/2019	4/18/2020							
☐ Oscilloscop	2/22/2019	2/22/2020							
☐ EMC Trans	2/22/2019	2/22/2020							
☐ AC Power S	2/22/2019	2/22/2020							
☐ Field Intens	2/22/2019	2/22/2020							
☐ ESD Simula	2/22/2019	2/22/2020							
⊠ Shielded Ro	⊠ Shielded Room not required								

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#### Annex C Rogers Qualifications

Scot D. Rogers, Engineer

#### Rogers Labs, Inc.

Mr. Rogers has approximately 32 years' experience in the field of electronics. Work experience includes working in the automated controls industry, design, development and testing of radio communications and electronic equipment.

#### Positions Held:

Systems Engineer: A/C Controls Mfg. Co., Inc. 6 Years

Electrical Engineer: Rogers Consulting Labs, Inc. 5 Years

Electrical Engineer: Rogers Labs, Inc. Current

#### Educational Background:

- 1) Bachelor of Science Degree in Electrical Engineering from Kansas State University
- 2) Bachelor of Science Degree in Business Administration Kansas State University
- 3) Several Specialized Training courses and seminars pertaining to Microprocessors and Software programming.

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#### Annex D Laboratory Certificate of Accreditation

**United States Department of Commerce** National Institute of Standards and Technology



## Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200087-0

#### Rogers Labs, Inc.

Louisburg, KS

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

#### **Electromagnetic Compatibility & Telecommunications**

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2019-11-07 through 2020-03-31

Effective Dates

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