Test Report 2024-111

Version A Issued 6 Sept 2024

Project: GCL-0580

Model Identifier: A05000 Primary Test Standard(s):

CFR 47, FCC Part 15.249

RSS-210 Issue 11

Garmin Compliance Lab

Garmin International
1200 E 151st Street
Olathe Kansas 66062 USA

Client-supplied Information

FCC ID: IPH-05000 IC ID: 1792A-05000



See section 6 of this report regarding the presence or absence of accreditation logos or marks on this cover page.

1. Summary

The equipment or product described in section 5 of this report was tested at the Garmin Compliance Lab according to standards listed in section 6. This report focuses on the 2.4 GHz ANT transceiver(s) and measurements were limited to the 1-25 GHz frequency range. In the frequency stability test record, the BLE transmitter was used to show compliance for both BLE and ANT. The results are as follows.

Parameter	Description	Key Performance Values	Result	Data starts at page
Radio Modulation	Summary of the kinds of communication this radio can achieve, as stated by the client. [RSS-GEN at Annex A item 10b]	Digitally modulated spread spectrum at rates as high as 1 Mbps.	Reported	NT
Restricted Bands	The radio must not emit in certain designated restricted frequency bands above a set of limit values. [15.205; RSS-210 at 7.1]	Emissions in the restricted bands were at least 5.84 dB below the applicable limits.	PASS	11
Carrier and Harmonic Emissions	The field strength from the radio carrier and its harmonics must meet specific limits at a 3 m test distance. Other unwanted emissions also have to meet what is commonly called the Class B limit. [15.249(a); RSS-210 at B.10]	The limit is 50 mV/m (94 dBuV/m) in the carrier band, and 0.5 mV/m (54 dBuV/m) at all other frequencies. This sample demonstrated 8.6 dB of margin or greater. At other non-harmonic frequencies, unwanted emissions had at least 5.5 dB of margin.	PASS	15
Duty Cycle Effects	A summary of how ANT transmitter Duty Cycle alters the measured emission levels.	This is presented to the reader for background information on test methodology.	Reported	20
Other Bandwidths	Regulatory agencies also require the reporting of signal bandwidths using alternate processes. [2.202; RSS-GEN at 6.7]	These values are reported but have no actual performance requirements.	Reported	30
Unwanted Emissions (Mains Conducted)	While transmitting, the emissions conducted into the power mains must not be too strong. [15.207, RSS-Gen at 8.8]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 23.6 dB of margin.	PASS	35

NT (Not Tested) means the requirement may or may not be applicable, but the relevant measurement or test was not performed as part of this test project.

N/A (Not Applicable) means the lab judged that the test sample is exempt from the requirement.

Table 1: Summary of results

Report Organization

For convenience of the reader, this report is organized as follows:

- 1. Summary
- 2. Test Background
- 3. Report History and Approval
- 4. Test Sample Modifications and Special Conditions
- 5. Description of Equipment Tested

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- 6. Test Standards Applied
- 7. Measurement Instrumentation Uncertainty
- 8. Selected Examples of Calculations
- 9. Environmental Conditions During Test
- 10. Immunity Performance Criteria

Annex: Test records are provided for each type of test, following the order and page numbering stated in the summary table. Concluding notes appear on the final page of this report.

Due to confidentiality, certain material (such as test setup photographs) has been removed from this report and placed in GCL Test Report 2024-116. That report is treated as a part of this document by way of this reference.

2. Test Background

2.1 The Test Lab

The testing reported here was performed at the Garmin Compliance Lab, an organization within Garmin International, located at 1200 E 151st St, Olathe Kansas, USA. The contact telephone number is +1.913.397.8200.

2.2 The Client

The testing was performed on behalf of the Garmin design group, a separate organization located at 1200 E 151st St, Olathe Kansas, USA. Witnesses from the business group included: None.

2.3 Other Information

Test Sample received: 22 July 2024
Test Start Date: 24 July 2024
Test End Date: 22 Aug 2024

The data in this test report apply only to the specific samples tested.

Upon receipt all test samples were believed to be properly assembled and ready for testing.

3. Report History and Approval

This report was written by Andy Heier and initially issued on 6 Sept 2024 as Version A.

Report Technical Review:

David Arnett

Technical Lead EMC Engineer

Report Approval:

Shruti Kohli

Manager Test and Measurement (EMC, Reliability and Calibration)

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4. Test Sample Modifications and Special Conditions

The following special conditions or usage attributes were judged during test to be necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

The following modifications to the test sample(s) were made, and are judged necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

5. Description of the Equipment Tested

5.1 Unique Identification

Product Model A05000 Serial Number tested 477224793

This product tested is a mobile device for collecting and sharing data with the user and nearby electronic devices.

The client affirmed that the test samples will be representative of production in all relevant aspects.

5.2 Key Parameters

EUT Input Power: 5 Vdc I/O Ports: USB

Radio Transceivers: Bluetooth Low Energy, ANT, NFC

Radio Receivers: GPS L1, GPS L5, Galileo E1, Galileo E5a/b, BeiDou, GLONASS

Primary Functions: Data collection and communication
Typical use: Portable in multiple orientations

Highest internal frequency: 2.484 GHz

Firmware Revision 4.03

5.3 Operating modes

During test, the EUT was operated in one or more of the following modes.

- Mode 3: M3 (BleTx). Bluetooth Low Energy radio transmitting consistently on a selected channel at 1 Mbps or 2 Mbps.
- Mode 4: M4 (BleLnk). Bluetooth Low Energy radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.
- Mode 5: M5 (AntTx). ANT radio transmitting consistently on a selected channel.
- Mode 6: M6 (AntLnk). ANT radio is paired to a companion device, transmitting and receiving data in accordance with the protocol, and maintaining the paired relationship.
- Mode 9: M9 (RxBtBIA). The radio was set to receive 2.4 GHz signals but not transmitting in Bluetooth, Bluetooth low energy or ANT.
- Mode 12: M12 (NfcLnk). The NFC radio was transmitting and actively linked to a NFC Card Reader.
- Mode 13: M13 (GNSS). The Global Navigation Satellite System receiver is monitoring the GNSS bands, attempting to detect a constellation and determine location. Unless otherwise noted, the EUT was provided simulated GNSS signals representing one of more constellation types. In addition, the EUT may have been reporting signal levels and satellite data to an attached computer to monitor link health.
- Mode 14: M14 (NfcIdle). The NFC Radio was powered, but not transmitting or linked to any devices.

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Mode 19: M19 (ML1). Multiple link, combining modes M4 & M6. The EUT is actively paired to both a BLE and an ANT companion device, used for Immunity tests.

Mode 20: M20 (ML2). Multiple link, combining modes M12 & M13. The EUT is actively linked to a NFC card reader and the specified satellite system, used for immunity tests.

5.4 EUT Arrangement

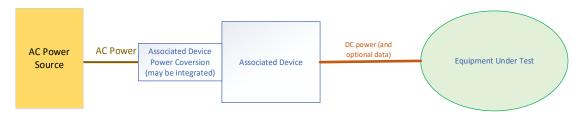
During test, the EUT components and associated support equipment were selected including the following arrangement sets.

Arrangement 1: A1 (Solo). The test sample operates from its battery and no external physical connections. No block diagram is needed for this arrangement.

Arrangement 2: A2 (Upwr). The test sample is attached to a Mains-powered device connected that provides dc power to the sample over a cable but no user data. See the block diagram in Figure 1.

Arrangement 3: A3 (Udata). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and user data over a cable. See the block diagram in Figure 1.

Arrangement 4: A4 (Udc). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and may or may not provide user data. This arrangement is specified in the test plan to provide staff flexibility when the presence or absence of data on the cable is not pertinent. See the block diagram in Figure 1.



This interconnect drawing is not to scale. It does not indicate the placement of devices.

Figure 1: Block diagram of equipment arrangements A2, A3, A4

Arrangement 6: A6 (NFCu). The test sample is powered via internal battery and actively linked to a NCR reader powered by a laptop PC.

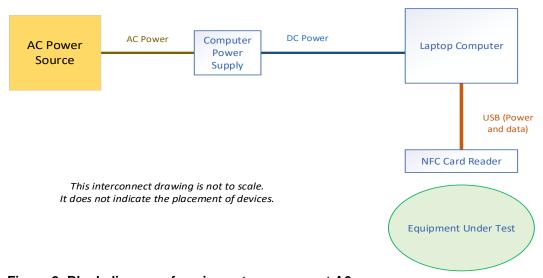


Figure 2: Block diagram of equipment arrangement A6

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Arrangement 7: A7 (NFCu). The test sample is powered via internal battery and actively linked to a passive NFC tag.

This interconnect drawing is not to scale.
It does not indicate the placement of devices.

Equipment Under Test

Figure 2: Block diagram of equipment arrangement A7

5.5 Associated Equipment (AE) used

Description	Manufacturer	Model	Serial/Part Number
USB C power adaptor	Phihong (Garmin)	AQ27A-59CFA	362-00118-00
Tablet	Apple	iPad Pro 11 inch	DMPZ7582KD6L
Laptop	Dell	Latitude 5410	5VSPFB3
Power Supply	Dell	HA65NM191	0BD-7TC0-A02
Phone	Samsung	SM-G973U (S10)	RF8MC0W9XVR
NFC Card Reader	ACS	ACR1252U-M1	RR554-118449
Auxiliary Device	Garmin	A04600	3423419439
Auxiliary Device	Garmin	A04883	3477207518

Table 2: List of associated equipment that may have been used during test

5.6 Cables used

Description	From	То	Length	EMC Treatment
USB C to custom cable	Power and/or Data source	EUT	0.5m	None

Table 3: List of cables that may have been used during test

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6. Test Standards Applied

6.1. Accredited Standards

The following test or measurement standards were applied and are within the scope of the lab's accreditation. All results in this report that cite these standards are presented as Accredited results consistent with ISO/IEC 17025.

CFR 47, FCC Part 15, Subpart C ANSI C63.10: 2020 and ANSI C63.10: 2020 +Cor 1: 2023 AS/NZS 4268: 2017 RSS-GEN Issue 5 Amd 2 RSS-210 Issue 11

6.2 Non-accredited Standards

The following test or measurement standards were applied and are either outside the scope of the lab's accreditation, or were performed in such a way that results are not presented as being fully accredited.

FCC Part 2.202 TRC-43 Issue 3

6.3 Variances

The following variances were applied to standards cited in this section.

Where different test standards cover the same test parameter or phenomenon, and the standards have compatible differences, the stricter of the requirements is typically applied. For example, a consolidated limit may be applied to emission tests selecting the strictest of the limits at each frequency. Likewise, if one standard requires a vertical antenna sweep with boresighting and another does not, swept motion with boresighting will typically be used as it is the more stringent requirement.

6.4 Laboratory Accreditation

The Garmin Compliance Lab, an organization within Garmin International, is registered with the US Federal Communication Commission as US1311. The lab is recognized by the Canada Department of Innovation, Science, and Economic Development (ISED) under CAB identifier US0233.

The Garmin Compliance Lab, an organization within Garmin International, is accredited by A2LA, Certificate No. 6162.01. The presence of the A2LA logo on the cover of this report indicates this is an accredited ISO/IEC 17025 test report. If the logo is absent, this report is not issued as an accredited report. Other marks and symbols adjacent to the A2LA logo are accreditation co-operations of which A2LA is a member under a mutual recognition agreement, and to which the Garmin Compliance Lab has been sublicensed.

7. Measurement Instrumentation Uncertainty

The lab has analyzed the sources of measurement instrumentation uncertainty. The analysis concludes that the actual measurement values cited in this report are accurate within the U_{LAB} intervals shown below with approximately 95% statistical confidence. Where the report shows a judgment that a test sample passes a test against a published limit based on these measured values, that judgment has a statistical confidence of 97.5% or greater. Measurement Instrumentation Uncertainty is one component of over-all measurement uncertainty, and other uncertainty components are not considered as part of this analysis.

The primary benchmark for measurement instrumentation uncertainty (MIU) in an electromagnetic compatibility (EMC) test lab is the set of U_{CISPR} values published in CISPR 16-4-2. In all cases where a U_{CISPR} value is published by CISPR, the analysis shows that U_{LAB} – this lab's estimated MIU – is better than the U_{CISPR} benchmark.

The secondary benchmark for MIU in an EMC lab performing radio transceiver tests is a set of uncertainty limit values published in various ETSI standards. In this report, U_{ETSI} is the most restrictive of the values found in the ETSI EN standards listed in section 5 of this report. The analysis principles are described in the ETSI TR documents listed there. In most cases U_{LAB} is better than the U_{ETSI} benchmark. Where U_{LAB} exceeds the U_{ETSI} benchmark cited here, that entry is preceded by an asterisk. When required by the ETSI EN standards, excess uncertainty will be added to the measurand before comparison to a limit. In an individual test report, staff may reevaluate that excess uncertainty based on the uncertainty of the method used and the uncertainty limits of the actual ETSI EN standard being applied, and the revised uncertainty values will be shown in the test report.

Some measurement uncertainties analyzed and reported here are not addressed in CISPR 16-4-2 or the ETSI standards, as indicated by the entry 'None.'

Test Type		U _{LAB}	UCISPR	U _{ETSI}
Conducted DC voltage		0.09% + 2 x LSDPV	None	1%
Conducted AC voltage bel	ow 500 Hz	1.0% + 3 x LSDPV	None	2%
Conducted Emissions, Ma	ins Voltage	0.10% + 10 mV	None	None
Conducted Emissions, Ma	ins Current	0.10% + 3 mA	None	None
Conducted Emissions, Mains Power		0.15% + 100 mW	None	None
Conducted Emissions, Po-	wer Mains, 9 kHz to 150 kHz	1.49 dB	3.8 dB	None
Conducted Emissions, Po-	wer Mains, 150 kHz to 30 MHz	1.40 dB	3.4 dB	None
Conducted Emissions, Ca	t 6 LCL, 150 kHz to 30 MHz	2.80dB	5 dB	None
Conducted Emissions, Ca	t 5 LCL, 150 kHz to 30 MHz	3.21 dB	5 dB	None
Conducted Emissions, Ca	t 3 LCL, 150 kHz to 30 MHz	4.24 dB	5 dB	None
Radiated Emissions, below	w 30 MHz	0.88 dB	None	6 dB
Radiated Emissions, 30 MHz to 1000 MHz		2.77 dB	6.3 dB	6 dB
Radiated Emissions, 1 GH	Iz to 18 GHz	2.60 dB	5.2 & 5.5 dB	6 dB
Radiated Emissions, 18 GHz to 26.5 GHz		2.73 dB	None	6 dB
*Radio Signal Frequency	Accuracy	*1.55 x 10^-7	None	1.0 x 10^-7
Radio Signal Occupied Ba	ındwidth	0.95%	None	5%
Radio Power or Power Sp	ectral Density	0.98 dB	None	1 dB
Temperature	•	0.38 °C	None	1 °C
Barometric Pressure		0.38 kPA	None	None
Relative Humidity		2.85% RH	None	±5% RH
Signal Timing	The greater of these three	0.63 usec	None	None
	9	0.01% of value		
		0.5 x LSDPV		

Note: LSDPV stands for the Least Significant Digit Place Value reported. In the value 1470 msec, the least significant digit is the 7. It has a 10 msec place value. The LSDPV is thus 10 msec and the maximum error due to roundoff would be 5 msec. If the time value were reported as 1470 msec, the underscore indicates that the 0 is a significant figure and the error due to roundoff would be 0.5 msec. All digits provided to the right of a decimal point radix are significant.

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8. Selected Example Calculations

Certain regulators require samples of the calculations that lead from the raw measurement to the final result for AC Mains conducted and unintended radiated emissions. The assumption is that the lab performs raw measurements, then adds, subtracts, multiplies, or divides based on transducer factors, amplifier gains, and losses in the signal transmission path. In this lab, our CISPR 16 Receiver does not work that way. The calibration factors and losses and gains are provided to the receiver as detailed data files. These factors are applied in the RF measurement path prior to the detector. But as a step in the lab measurement process, staff frequently verify that these factors are applied correctly. They make a measurement with the factors applied inside the receiver, then they disable the factors and remeasure the result manually adding in the various relevant factors.

The transmission loss is measured including the combined losses and gains of preamplifiers, cables, and any band-selective filters. In many cases above 1 GHz it is a negative value, indicating that the preamplifier gain is greater than these other losses.

Here are examples of these calculations. The data in these examples was not taken as part of this project:

8.1 AC Mains conducted emissions at 22 MHz

(Raw measurement) + (AMN factor) + (transmission loss) = Result

(7.145 dBuV) + (9.812 dB) + (0.216 dB) = 17.173 dBuV

8.2 Radiated Emissions at 630 MHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(2.25 dBuV) + (27.80 dB/m) + (2.89 dB) = 32.94 dBuV/m

8.3 Radiated Emissions at 2.7 GHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(43.72 dBuV) + (32.22 dB/m) + (-36.09 dB) = 39.85 dBuV/m

9. Environmental Conditions During Test

Environmental conditions in the test lab were monitored during the test period. Temperature and humidity are controlled by an air handling system. As information to the reader, the conditions were observed at the values or within the ranges noted below. For any tests where environmental conditions are critical to test results and require further constraints or details, the test records in the annex may provide more specific information.

Temperature: 20 to 21 °C

Relative Humidity: 49% to 61% (non-condensing)

Barometric Pressure 98 to 110 kPa

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
Barometer	Traceable	6453	221702700	3-Aug-2022	1-Aug-2024
Barometer	Traceable	6453	240300703	9-Apr-2024	9-Apr-2027

Table 4: Environmental monitoring device

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10. Immunity Performance Criteria

If this report includes immunity tests then results have been categorized as Performance Criteria A, B, C, or D. The standards that the lab applied will define the details for A, B, and C, as well as which criterion is required for each type of test. They will also define the electrical stresses that were applied during each test. In a very general sense the observed criteria noted in this report are as follows:

<u>Criterion A.</u> The stress applied did not alter product operation. This criterion is generally used for 'continuous' stresses that can be present for a long time in the places the product will be used, or that can appear often, even though they may come and go over time.

<u>Criterion B.</u> The stress applied altered product operation, but the product self-recovered so that the user would not have to try to figure out how to restore it to full operation. This criterion is generally used for 'transient' stresses that appear briefly and occasionally, but are usually not present in the places the product will be used.

<u>Criterion C.</u> The stress applied altered product operation, but the user could restore it to full operation, for example by power cycling the product. This criterion is generally used for 'transient' stresses that appear briefly and only rarely in the places the product will be used.

<u>Criterion D.</u> This is not an official criterion in the standards, because it would be a failure of the requirements. This indication in a test record means the product was affected in a way that the user might not be able to correct. The effect could include some degree of hardware damage, or it could include loss of program files or data files necessary for operation.

Repeatability is an issue in all EMC immunity work. When the product operation changes unexpectedly during a test, and the change would fail the requirements of the standard, this is an anomaly. The test operator needs to determine whether the anomaly was a result of the applied electrical stress. The investigation is done by repeating the section of the test where the anomaly occurred three times. If the same or a similar anomaly occurs in any of the three repeat trials, it is confirmed as a response to the stress. If not, the anomaly is judged unreproducible and is not considered when judging the A, B, or C observed performance. Since there is usually no ability to confirm a Criterion D anomaly, these are usually treated as Criterion D upon a single occurrence.

Tests that require Criterion B performance will be judged to Pass if criteria A or B is observed. Similarly, tests that require Criterion C performance will be judged to Pass if criteria A, B, or C is observed.

ANNEX

The remainder of this report is an Annex containing individual test data records. These records are the basis for the judgments summarized in section 1 of this report. The Annex ends with a set of concluding notes regarding use of the report.

Test Record Radiated Emission Test RE04 Project GCL0580

Test Date(s) 31 July 2024

Test Personnel Majid Farah and Andy Heier, supervised by David Arnett

Product Model A05000 Serial Number tested 477224793

Operating Mode M5 (AntTx)
Arrangement A2 (Upwr)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247, RSS-GEN (as noted in Section 6 of the

report)

Frequency Range: Restricted Bands (2200-2300 MHz, 2310-2390 MHz, 2483.5-2500 MHz)

Pass/Fail Judgment: PASS

Test record created by: Andy Heier **Date of this record:** 01 Aug 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	00259208	30-May-2024	30-May-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-0/0	1	Calibration	Not Required
Shockforce G1 Tape Measure	Crecent Lufkin	L1135CME-02	GMN0013783	26-Jun-2024	26-Jun-2027

Table RE04.1: Test Equipment Used

Software Used

Keysight PXE receiver software A.32.06, RE Signal Maximization Tool v2024Jul31.xlsx

Test Data

The radiated emission test began with a preliminary scan in each restricted band at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Final field strength measurements were taken in that set of positions.

Restricted band measurements in the lower band were made while the transmitter was tuned to its lowest frequency of 2402 MHz for the 1 Mbps data rate, and 2404 MHz for the 2 Mbps data rate. Measurements in the upper band were made while the transmitter was tuned to its highest frequency of 2480 MHz for the 1 Mbps data rate, and 2478 MHz for the 2 Mbps data rate.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

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The tables show the selected final measurement data between the FCC restricted bands. It includes a the strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC restricted band Class B Limit at 3m.

Frequency	Avg Limit Pk Limit Avg Level Pk Level Av Margin		Pk Margin	Azimuth	Height	Polarity			
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)	-
2386	54	74	38.974	51.146	15.026	22.854	26	2950	VERT
2389.8	54	74	35.294	52.434	18.706	21.566	26	2950	VERT

Table RE04.2: FCC restricted bands from 2200 to 2390 MHz

Frequency	Avg Limit	Avg Limit Pk Limit		vg Limit Pk Limit Avg Level Pk		Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)			
2483.5	54	74	49.522	68.157	4.478	5.843	-34	1087	HORZ		
2488	54	74	44.606	61.748	9.394	12.252	-34	1087	HORZ		

Table RE04.3: FCC restricted band from 2483.5 to 2500 MHz

The graphs below show the background spectrum observed during pre-scan, as well as the final data points from the table above.

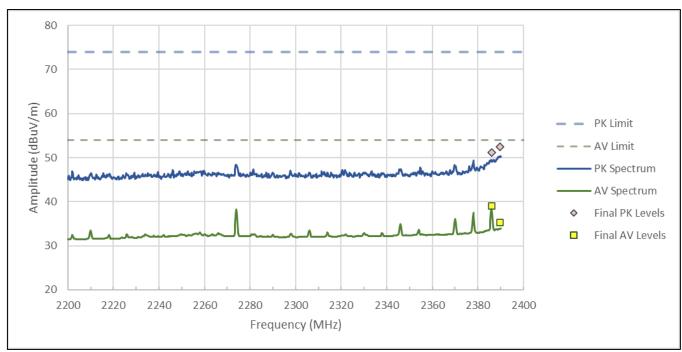


Figure RE04.1: FCC restricted band spectral data from 2200 to 2390 MHz

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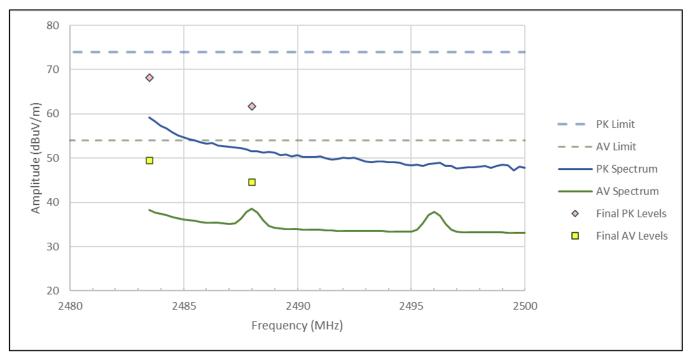


Figure RE04.2: FCC restricted band spectral data from 2483.5 to 2500 MHz

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE04.3: EUT test setup, primary view

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Image removed for client confidentiality. See section 1 of this report to identify the report where the photos may be viewed.

Figure RE04.4: EUT test setup, reverse view

This line is the end of the test record.

Test Record Radiated Emission Test RE21 Project GCL0580

Test Date(s) 02 Aug 2024 Test Personnel David Kerr

Product Model A05000 Serial Number tested 477224793

Operating Mode M5 (AntTx)
Arrangement A2 (Upwr)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-210, RSS-GEN (as noted in Section 6 of the

report).

Frequency Range: 1000 MHz to 3200 MHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr **Date of this record:** David A Kerr 02 Aug 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	259208	30-May-2024	30-May-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026

Table RE21.1: Test Equipment Used

Software Used: Keysight PXE software A.32.06, EPX test software Version 2023.01.001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 1000 MHz and 3.2 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is

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highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

In this test, fewer than six emissions were observed within 20 dB of the limit. The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

The test sample was transmitting with a 99.0% duty cycle during this test. The duty cycle was measured using a fast diode detector RF power sensor and calculated according to ANSI C63.10. The client states that the maximum duty cycle for the ANT protocol is 13%. The CISPR Average detector has a square law response for signal pulses with these ANT timing parameters. In the data tables below, the Average detector values for the carrier frequencies have been adjusted downward by 17.6 dB, which comes from 20 * log (13% / 99%). The Peak detector values are not reduced for duty cycle, nor were the other emissions adjusted for duty cycle.

Frequency		Reading		Factor	Le	Level		Limit		Margin		Angle
N 41 1-	Pol.	dB(μV)		dD(1/m)	dB(μ	V/m)	dB(μ	dB(μV/m) dB		В		doa
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg
3060.750	V	1.4	18.8	43.6	45.0	62.4	54.0	74.0	9.0	11.6	319.1	314.0
2402.000	٧	56.9	57.9	41.2	98.1	99.1	94.0	114.0	13.5	14.9	264.6	193.0

Table RE21.2: Emission summary (ANT, 2402MHz X orientation)

Frequency	Pol.	Read	Reading Facto		Le	vel	Limit		Margin		Height	Angle
NALL-		dB(μV)	$dB(\mu V/m)$ $dB(\mu V/m)$		dB		ama	doa			
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg
2440.000	Н	60.1	61.1	41.4	101.5	102.5	94.0	114.0	10.1	11.5	100.0	150.0
3050.250	Н	1.7	18.5	43.6	45.3	62.1	54.0	74.0	8.7	11.9	378.6	185.0

Table RE21.3: Emission summary (ANT, 2440MHz X orientation)

Frequency		Read	ding	Factor	Le	vel	Lir	mit	Margin		Height	Angle
N41.1-	Pol.	dB(μV)		-ID(1 ()	dB(μ	V/m)	dB(μ	.V/m)	d	В		d
MHz	CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg	
2480.000	V	54.3	55.4	41.6	95.9	97.0	94.0	114.0	15.7	17.0	289.3	246.0
3141.500	V	1.2	18.0	44.2	45.4	62.2	54.0	74.0	8.6	11.8	218.4	330.0

Table RE21.4: Emission summary (ANT, 2480MHz X orientation)

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

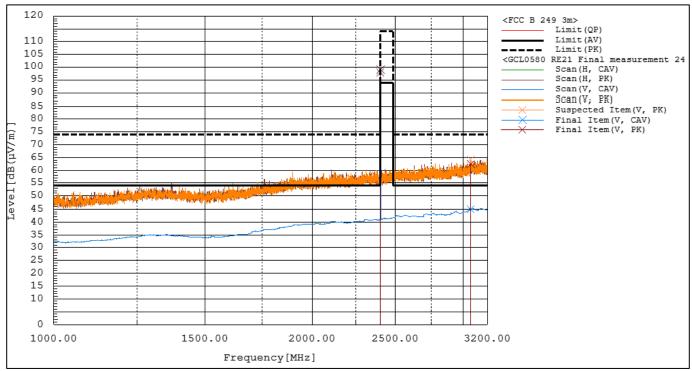


Figure RE21.1: Spectral data ((ANT, 2402MHz X orientation)

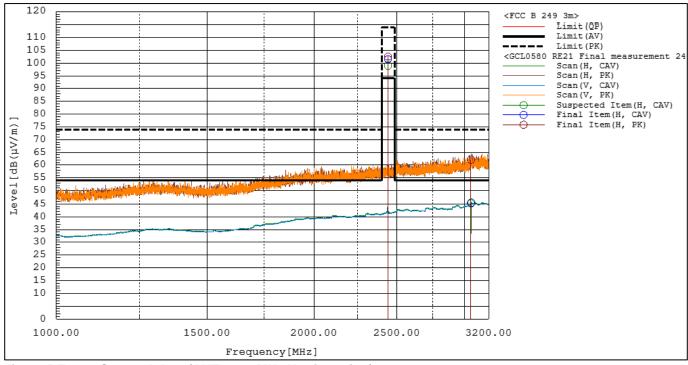


Figure RE21.2: Spectral data (ANT, 2440MHz X orientation)

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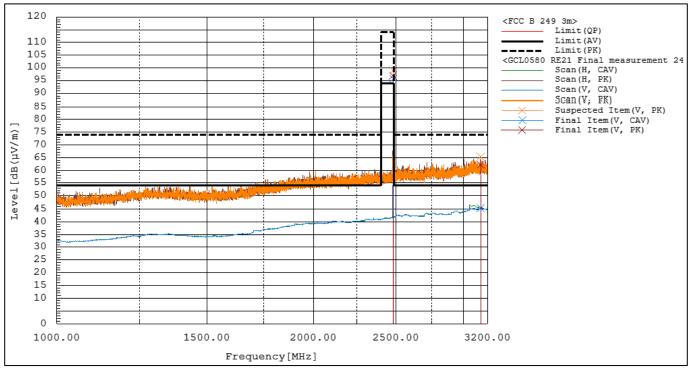


Figure RE21.3: Spectral data (ANT, 2480MHz X orientation)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE21.4: EUT test setup, first view (X orientation Front View)

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Figure RE21.5: EUT test setup, second view (X orientation Rear view)

This line is the end of the test record.

Test Record Duty Cycle Effects SP01

Test Date 19 Jan 2023 Test Personnel David Arnett

Product Model A04600 Serial Number tested 3431708548

Operating Mode Special: ANT Transmit per the sample studied Arrangement Special: USB Powered per the sample studied

Input Power 5V dc

Test record created by: David Arnett Date of this test record: 27 Jan 2023

Original record, Version A, created 27 Jan 2023.

Version B was created on 29 May 2024 for use in general test projects.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
RF Power Sensor	Rohde&Schwarz	NRP8S	109927	13-Jul-2022	15-Jul-2023
PXE 44GHz	Keysight	N9048B	MY59500016	2-Feb-2022	2-Feb-2023

Table SP01.1: Test equipment used

Test Software used: Keysight MXE System Code rev. A.33.03, R&S Power Viewer V11.3

Background

The question this test record addresses is how the radiated emission results above 1 GHz are affected by a change in transmission duty cycle. This is a general question related to the dynamics of the ANT transmission protocol and the CISPR detectors, not a specific product. As such this test record is relevant to many Garmin products other than the specific model used in the study.

ANSI C63.10 at various locations (such as 11.9.2.2.5.j) indicates that adjustment of measured average values using the measured duty cycle (D) is to be based on a linear law: 10 log(1/D). However, CISPR 16-1-1:2019 shows that a CISPR Average detector has square law pulse repetition response: 20 log(1/D). See, for example, figure 9 of CISPR 16-1-1, showing that a change in pulse repetition by a factor of 10 results in a 20 dB change in the instrument reading. The same figure shows that the reading of a CISPR peak detector should not be affected by the pulse repetition rate. This assumes the pulses are of sufficient duration to be detected.

The test application software in the test sample has two relevant modes for ANT radio transmissions. One is the regular ANT transmit test mode which produces near-continuous data. This is the operating mode used during radiated emission tests. The other is Packet mode which produces packets of a fixed length at a specified rate. That rate is expressed in units of packets-per-Hertz. These modes can be used to understand how the ANT duty cycle affects the Average Detector emission results, and whether it follows a linear or square law response.

Test Data

The client for the January 2023 project reported that the ANT radio protocol has a maximum duty cycle of 13.8%, which is much lower than the duty cycle used during radiated emission testing. The test modes discussed above allow a range of duty cycles to be evaluated above and below this protocol-limited value.

The duty cycles available in the various modes were first evaluated using the NRP8S, which is a fast diode RF power meter. This sample was one of the modified units providing a coaxial output from the transmitter rather than using the internal antenna. The packet length in Packet mode was measured at 156 usec, and duty cycles were measured for each available setting. The transmit power level from this sample was then evaluated in the same modes in a conducted manner by feeding the transmitter output through a coaxial cable to the input of the PXE

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Receiver. Data was recorded at the carrier frequency using peak and average detectors as they are usually set up in a CISPR-compliant receiver during radiated emission tests above 1 GHz. All amplitude data in dBm units were then normalized to the Peak detector level as measured at the maximum duty cycle.

The resulting duty cycle and normalized amplitude data are presented in Table SP01.2.

Packet Rate	Duty Cycle	Peak	Avg
(Hz)	(%)	(dB)	(db)
Ant Tx Mode	96.300%	0	-1.2
255	3.978%	0	-27.98
128	1.997%	0	-33.89
64	0.998%	0.1	-39.69
32	0.499%	0	-45.4
16	0.250%	0.1	-50.62
8	0.125%	0	-55.42
4	0.062%	0.1	-58.95
2	0.031%	0	-61.33
1	0.016%	0.1	-61.99

Table SP01.2: Duty Cycle and Normalized Amplitude for ANT transmitter

Figure SP01.1 below plots this data along with the curves for the linear law response in ANSI C63.10 (green) and the square law response for a CISPR 16-1-1 Average detector (yellow). The average data is observed to follow the square law response for duty cycles above 0.5%, and the Peak detector data is unaffected by the duty cycle.

The orange triangles in the plot show the factors that were used in January 2023 for converting measured data in ANT Transmit test mode to the levels one would find when ANT has the maximum duty cycle permitted by the radio protocol. For comparison of data to a peak detector limit, that adjustment was 0 dB. For comparison of data to an average detector limit, that change was 20 * log (13.8% / 96.3%) or -16.83 dB.

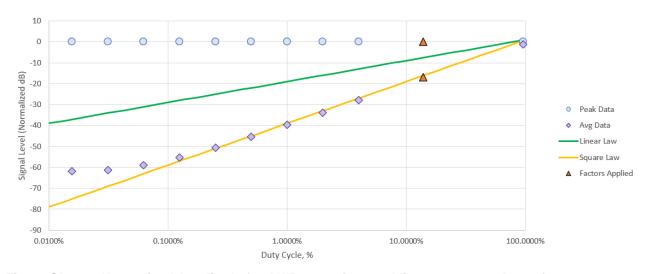


Figure SP01.1: Normalized Amplitude for ANT transmitter and linear or square law references

The Garmin Compliance lab uses this general result for projects involving ANT transmitter field measurements. The actual duty cycle, d_r, is measured for the test mode that will be used during radiated emission testing. The client reports the maximum duty cycle that the unit can produce in actual usage, d_u. Radiated emission data that has been measured using a CISPR Average detector can be reduced using 20*log₁₀(d_u/d_r) before comparing against a limit. Radiated emission data measured using a Peak detector is not reduced but is reported as measured.

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Test Record Radiated Emission Test RE22 Project GCL0580

Test Date(s) 16 Aug 2024

Test Personnel David Kerr, Jim Solum assisted by Vladimir Tolstik

Product Model A05000 Serial Number tested 477224793

Operating Mode M5 (AntTx)
Arrangement A2 (Upwr)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, ANSI C63.26, RSS-GEN, RSS-210 (as noted in

Section 6 of the report).

Frequency Range: 3200 MHz to 18 GHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr, Vladimir Tolstik

Date of this record: 03 Sep 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	259208	30-May-2024	30-May-2026
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
3 GHz High Pass filter	Anatech Electronics	0K0R2	1	Calibration	Not Required

Table RE22.1: Test Equipment Used

Software Used: Keysight PXE software A.32.06, EPX test software Version 2023.01/001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

In the 3.2 GHz to 18 GHz frequency range, pre-scan spectral data was taken at 1 meter and extrapolated to a 3 meter distance. Final measurements were made at 3 meters.

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At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 3200 MHz and 18 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency		Rea	ding	Factor	Factor Level		Limit		Margin		Height	Angle
N 41.1-	Pol.	dB(μV)	-ID(1 ()	dB(μ	dB(μV/m)		dB(μV/m)		dB		d
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg
4804.250	Н	35.2	46.4	7.3	42.5	53.7	54.0	74.0	11.5	20.3	260.9	295.0
7206.000	Н	29.1	42.8	11.5	40.6	54.3	54.0	74.0	13.4	19.7	238.4	235.0
9608.000	Н	26.2	39.5	15.1	41.3	54.6	54.0	74.0	12.7	19.4	251.0	269.0
12010.000	Н	26.2	40.0	18.5	44.7	58.5	54.0	74.0	9.3	15.5	238.5	99.0
14412.000	Н	24.8	38.6	20.7	45.5	59.3	54.0	74.0	8.5	14.7	183.9	171.0
16814.000	Н	24.5	38.1	24.0	48.5	62.1	54.0	74.0	5.5	11.9	164.1	0.0

Table RE22.2: Emission summary (ANT 2402MHz, X orientation)

Frequency		Read	ding	Factor	Factor Level		Limit		Margin		Height	Angle
N 41.1-	Pol.	dB(μV)		-ID(1 ()	dB(μ	.V/m)	dB(μ	V/m)	d	В		-l
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg
4880.000	Н	33.0	45.4	6.7	39.7	52.1	54.0	74.0	14.3	21.9	298.1	6.0
7320.000	Н	28.8	42.6	11.6	40.4	54.2	54.0	74.0	13.6	19.8	317.4	246.0
9760.000	Η	26.7	40.3	14.9	41.6	55.2	54.0	74.0	12.4	18.8	239.1	100.0
12200.000	Η	25.5	39.2	19.4	44.9	58.6	54.0	74.0	9.1	15.4	250.8	63.0
14640.000	Н	24.9	38.3	21.0	45.9	59.3	54.0	74.0	8.1	14.7	106.7	334.0
17080.000	Н	24.4	37.8	24.1	48.5	61.9	54.0	74.0	5.5	12.1	265.9	174.0

Table RE22.3: Emission summary (ANT 2440MHz, X orientation)

Frequency		Reading Factor		Reading		Factor	Le	vel	Lir	mit	Mai	rgin	Height	Angle
NAL 1-	Pol.	dB(μV)	-ID(1 ()	dΒ(μ	dB(μV/m)		dB(μV/m)		В		-l		
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm	deg		
4960.000	Н	34.7	45.6	6.8	41.5	52.4	54.0	74.0	12.5	21.6	400.0	33.0		
7440.000	Н	28.8	42.0	11.7	40.5	53.7	54.0	74.0	13.5	20.3	231.5	219.0		
9920.000	Η	26.8	40.2	16.2	43.0	56.4	54.0	74.0	11.0	17.6	167.6	350.0		
12400.000	Н	26.2	39.8	18.9	45.1	58.7	54.0	74.0	8.9	15.3	389.0	252.0		
14880.000	Н	24.8	38.3	21.4	46.2	59.7	54.0	74.0	7.8	14.3	227.5	225.0		
17360.000	Н	24.1	37.9	23.5	47.6	61.4	54.0	74.0	6.4	12.6	298.0	197.0		

Table RE22.4: Emission summary (ANT 2480MHz, X orientation)

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

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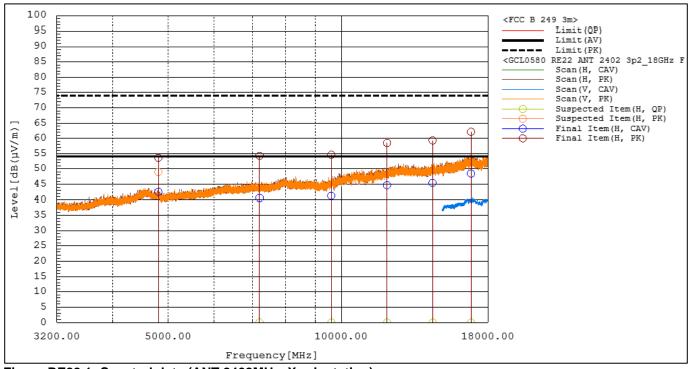


Figure RE22.1: Spectral data (ANT 2402MHz, X orientation)

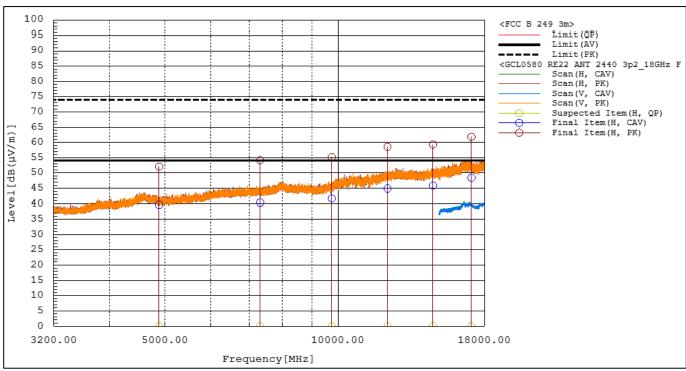


Figure RE22.2: Spectral data (ANT 2440MHz, X orientation)

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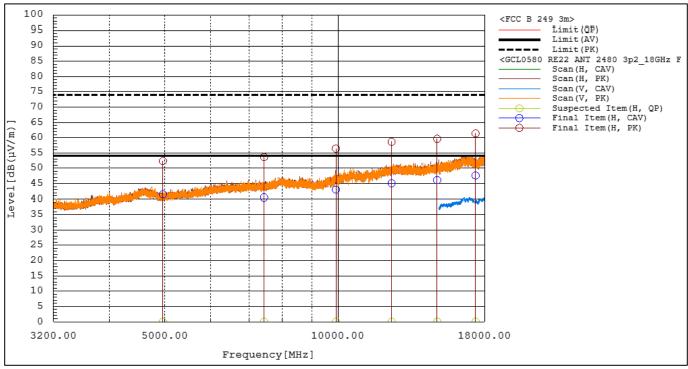


Figure RE22.3: Spectral data (ANT 2480MHz, X orientation)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

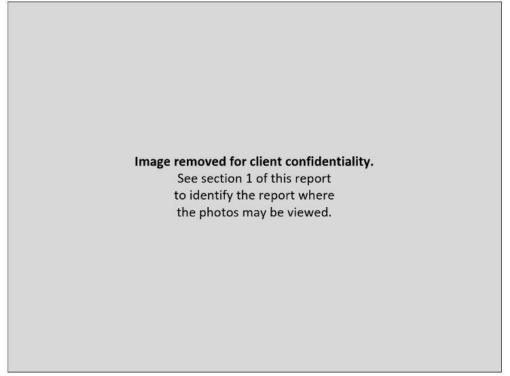


Figure RE22.4: EUT test setup, first view (X orientation)

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Figure RE22.5: EUT test setup, second view (X orientation)

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Test Record Radiated Emission Test RE23 Project GCL0580

Test Date(s) 15 Aug 2024

Test Personnel Vladimir Tolstik supervised by Jim Solum

Product Model A05000 Serial Number tested 477224793

Operating Mode M5 (AntTx)
Arrangement A2 (Upwr)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, RSS-210, RSS-GEN, ANSI C63.10 (as noted in Section 6 of the

report).

Frequency Range: 18 GHz to 25 GHz

Pass/Fail Judgment: PASS

Test record created by: Vladimir Tolstik **Date of this record:** V3 Sep 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025
Antenna, Horn, 10-40 GHz	ETS Lindgren	3116C	00227673	14-Sep-2023	15-Sep-2025
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Shockforce G1 Tape Measure	Crecent Lufkin	L1135CME-02	GMN0013784	26-Jun-2024	26-Jun-2027
Preamplifier, 18 Ghz to 40 Ghz	Com-Power	PAM-840A	461364	Calibration	Not Required

Table RE23.1: Test Equipment Used

Software Used: Keysight PXE software A.33.03, EPX test software Version 2023.01.001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

In the 18 GHz to 26.5 GHz frequency range, pre-scan spectral data was taken at 1 meter and extrapolated to a 3 meter distance. Final measurements were made at 3 meters.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

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The table shows the selected final measurement data between 18 GHz and 25 GHz. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

Frequency		Read	ding	Factor	Le	vel	Lir	mit	Mai	rgin	Height	Angle	
NALL-	Pol.	dB(μ V)	-ID(1 ()	dB(μ	V/m)	dB(μ	V/m)	d	В		4	
MHz		CAV	PK	dB(1/m)	CAV	PK	AV	PK	CAV	PK	cm de	cm	deg
19520.000	V	23.5	37.2	19.3	42.8	56.5	54.0	74.0	11.2	17.5	114.2	287.0	
24182.500	Н	22.0	35.9	21.7	43.7	57.6	54.0	74.0	10.3	16.4	254.6	159.0	

Table RE23.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

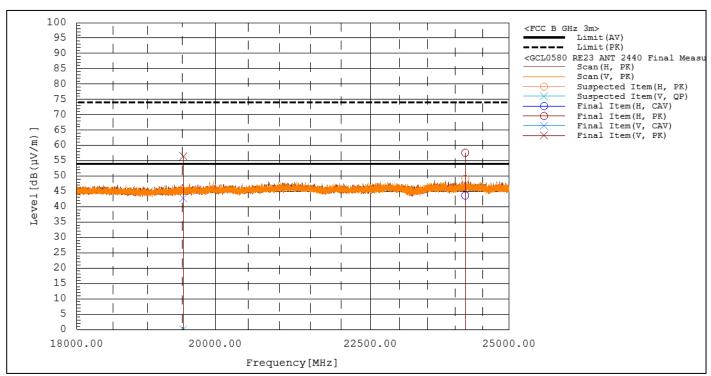


Figure RE23.1: Spectral data graph

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Setup Photographs

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See section 1 of this report to identify the report where the photos may be viewed.

Figure RE23.2: EUT test setup, first view

Image removed for client confidentiality.

See section 1 of this report to identify the report where the photos may be viewed.

Figure RE23.3: EUT test setup, second view

This line is the end of the test record.

Test Record

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Transmitter Bandwidth Tests Test IDs TR10 – TR11 Project GCL0580

Test Date(s) 24 Jul 2024

Test Personnel Vladimir Tolstik assisted by Jim Solum

Product Model A05000 Serial Number tested 477224758

Operating Mode M3 (BleTx), M5 (AntTx)

Arrangement A4 (Udc)
Input Power USB 5 Vdc

Test Standards: FCC Part 2.202, ANSI C63.10, TRC-43, RSS-GEN (as noted in Section 6 of the

report).

Radio Protocol Bluetooth Low Energy (BLE), ANT

Radio Band 2480 to 2483.5 MHz

Pass/Fail Judgment: Reported

Test record created by: Vladimir Tolstik **Date of this record:** 26 Jul 2024

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025

Table TR10.1 Equipment Used

Software used: Keysight PXE software A.37.02,

Background

There are regulatory requirements to present two additional types of bandwidth analyses: 99% Occupied Bandwidth and Necessary Bandwidth. There are no limits or functional requirements around these data, beyond a reporting requirement. The contents of this test record are for information, and do not affect compliance of the devices that are the subject of this report.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other Bluetooth, BLE, and ANT radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

Test Setup

This block diagram shows the test equipment setup.

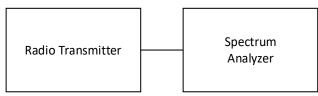


Figure TR10.1: Test setup

Occupied Bandwith, 99% Test Method

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During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified percentage of the total power observed. The spectrum is scanned hundreds of times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

Occupied Bandwith, 99% Test Data

The data for each type of bandwidth is summarized below, followed by the spectral data for the cases highlighted in yellow. The analysis threshold for this test was the bandwidth containing 99% of the observed power using the ANSI C63.10 method. The standards require testing a frequency near the bottom, middle, and top of the band. The measured bandwidth data are in bold font and have MHz as their units of measure.

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	1.0571	NT	1.0618	NT	1.0622
BT Low Energy	2 Mbps	NT	2.0711	2.0784	2.0783	NT
ANT		0.9880	NT	0.9890	NT	0.9877

Table TR10.2: Summary of 99% Occupied Bandwidth Data in MHz for Bluetooth, ANT and BLE modes



Figure TR10.2: Occupied bandwidth data for BLE 1 Mbps at high channel (2480 MHz)

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Figure TR10.3: Occupied bandwidth data for BLE 2 Mbps at mid channel (2440 MHz)



Figure TR10.4: Occupied bandwidth data for ANT at mid channel (2440 MHz)

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Necessary Bandwidth Calculations

The Necessary Bandwidth is a theoretical value based on the specifications for a communication protocol, rather than the hardware implementation and a subsequent lab measurement. The analysis methods in FCC Part 2.202 and TRC-43 are the same for NFC, Bluetooth, ANT, and IEEE 802.11b WiFi. However, they differ for IEEE 802.11g and 11n systems because the Canadian TRC-43 standard provides different analysis methods for Orthogonal Frequency Division Multiplexing systems (OFDM). The tables below will show the analysis for most of the radios signals as a combined approach, then separately analyze the results for IEEE 802.11g and n systems. The tables below may include radio protocols that are not part of the product being evaluated.

NFC (Near Field Communication) at 13.56 MHz uses continuous wave telegraphy without tone modulation. The bit rate 'B' in the FCC and TRC equations is split into two parts here. B is the baud rate. C is a coding factor. C=1 for Miller encoding where the transition speed is as high as the bit rate, or C=2 for Manchester encoding where the transition speed is as high as twice the bit rate). K is a factor set to 3 for non-fading circuits under the standards. The Necessary Bandwidth, B_N is then:

 $B_N = BCK$

Radio Type	B (kbaud)	С	K	Bn (kHz)
NFC A	106	1	3	318.0
NFC B	212	2	3	1272.0
NFC B	424	2	3	2544.0

Table TRxx.100: Necessary Bandwidth for NFC

The radio modulation schemes for Ant, for the various Bluetooth protocols, and for IEEE 802.11 b WiFi are a mix of Phase Shift Key (PSK) and Quadrature Amplitude Modulation (QAM) techniques. The Necessary Bandwidth calculations use the equations from 47CFR Part 2.202(g) table section 6. We have set the variable K=1, which leaves the equation for both PSK and QAM as:

 $B_N = 2R / Log_2(S)$

where B_N is the Necessary Bandwidth, R is the bit rate, and S is the number of signaling states.

Radio Type	R Mbps	K	S	LogBase2 of (S)	Bn (MHz)
ANT / ANT+	1	1	2	1	2

Table TRxx.101: Necessary Bandwidth for ANT and ANT+ Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	Method	R Mbps	K	S	LogBase2 of (S)	Bn (MHz)
Bluetooth	BR	GFSK	1	1	2	1	2
	EDR2	Pi/4 DPSK	2	1	4	2	2
	EDR3	8DPSK	3	1	8	3	2
BLE	1Mbps	GFSK	1	1	2	1	2
	2Mbps	DQPSK	2	1	4	2	2

Table TRxx.102: Necessary Bandwidth for Bluetooth Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	Bn (MHz)
802.11 b	1	1	1	2	1	2
	2	2	1	4	2	2
	5.5	5.5	1	4	2	5.5
	11	11	1	4	2	11

Table TRxx.103: Necessary Bandwidth for IEEE 802.11 b Radio Protocol (FCC and TRC-43)

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Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	Bn (MHz)
802.11 a/g	6	6	1	2	1	12
	9	9	1	2	1	18
	12	12	1	4	2	12
	18	18	1	4	2	18
	24	24	1	16	4	12
	36	36	1	16	4	18
	48	48	1	64	6	16
	54	54	1	64	6	18
802.11 n/ac	MCS0	7.2	1	2	1	14.4
	MCS1	14.4	1	4	2	14.4
	MCS2	21.7	1	4	2	21.7
	MCS3	28.9	1	16	4	14.5
	MCS4	43.3	1	16	4	21.7
	MCS5	57.8	1	64	6	19.3
	MCS6	65	1	64	6	21.7
	MCS7	72.2	1	64	6	24.1
	MCS8	86.7	1	256	8	21.7

Table TRxx.104: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac 20 MHz Radio Protocols (FCC)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	Bn (MHz)
802.11 n/ac	MCS0	15	1	2	1	30.0
	MCS1	30	1	4	2	30.0
	MCS2	45	1	4	2	45.0
	MCS3	60	1	16	4	30.0
	MCS4	90	1	16	4	45.0
	MCS5	120	1	64	6	40.0
	MCS6	135	1	64	6	45.0
	MCS7	150	1	64	6	50.0
	MCS8	180	1	256	8	45.0
	MCS9	200	1	256	8	50.0

Table TRxx.105: Necessary Bandwidth for IEEE 802.11 n and ac 40 MHz Radio Protocols (FCC)

As a note, the bit rate for IEEE 802.11 n or ac WiFi is calculated based on the IEEE standard's short guard interval of 400 nsec. If only the long guard interval of 800 nsec were implemented, the bit rates would decrease by a small amount.

The TRC-43 method for OFDM signals simply multiplies the number of subcarriers, K, and the subcarrier spacing, N_S . In both cases, Ns is 312.5 kHz. The count of subcarriers includes nulls. So for example, 802.11 n uses 4 pilot subcarriers, 52 data subcarriers, and one null suppressed subcarrier in the middle for 57 total subcarrier channels. $B_N = N_S * K$

Radio Type	Mode	Ns (MHz)	K	Bn (MHz)
802.11a/g	20 MHz	0.3125	53	16.6
802.11n/ac	20 MHz	0.3125	57	17.8
802.11n/ac	40 MHz	0.3125	117	36.6

Table TRxx.106: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac Radio Protocols (TRC-43)

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Test Record

Conducted Emissions Mains Test CE02 Project GCL00580

Test Date(s) 26 July 2024

Test Personnel Andy Heier supervised by Dave Arnett

Product Model A05000 Serial Number tested 477224793

Operating Mode M5 (AntTx)
Arrangement A2 (Upwr)
Input Power 120 Vac 60 Hz

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, RSS-210 (as noted in Section 6 of the

report).

Frequency Range: 150 kHz to 30 MHz

Pass/Fail Judgment: PASS

Test record created by: Andy Heier **Date of this record:** 30 July 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025
LISN multiline; 20A 50uH	Com-Power	LIN-120C	20160005	3-Apr-2024	1-Apr-2027

Table CE02.1: Test Equipment Used

Software Used

Keysight PXE software A.33.03; CE Mains 150kHz to 30M Data Analysis V3 2024May23.xlsx

Test Data

The conducted emission test process began with a set of preliminary scans on both power conductors using both Quasi-Peak and Average detectors across the frequency range. Where the test standard requires cable manipulation, one or more likely worst case frequencies selected by the test personnel. Cables were manipulated to find the maximal signal strength while observing the receiver levels at those selected frequencies. At each of the frequencies selected for final measurements, Quasi-peak and Average detector readings were taken on each conductor.

The table shows the selected final measurement data. It includes at least the six strongest emissions observed relative to the limit lines, along with other data points of interest. The yellow highlight indicate the data points with the least margin to the quasi-peak detector limit and the average detector limit. A positive margin value indicates that the emission was below the test limit. The test limit is the Composite FCC/CISPR Class B Limit.

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Frequency	QP Limit	AV Limit	L1 QP	L2 QP	L1 AV	L2 AV	QP Margin	AV Margin
(kHz)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dB)	(dB)
150	66.00	56.00	30.30	30.75	23.61	23.29	35.25	32.39
443	57.01	47.01	27.69	26.51	22.77	21.46	29.33	24.24
715	56.00	46.00	27.37	26.87	22.38	21.81	28.63	23.62
3930	56.00	46.00	26.97	25.95	21.77	20.74	29.03	24.23
10001	60.00	50.00	29.58	29.40	25.64	25.35	30.42	24.36
30000	60.00	50.00	29.69	29.75	24.41	24.25	30.25	25.59

Table CE02.1: Emission summary (ANT)

The graph below shows preliminary scan data as continuous curves. Superimposed are the final measurement data points reported in the table above.

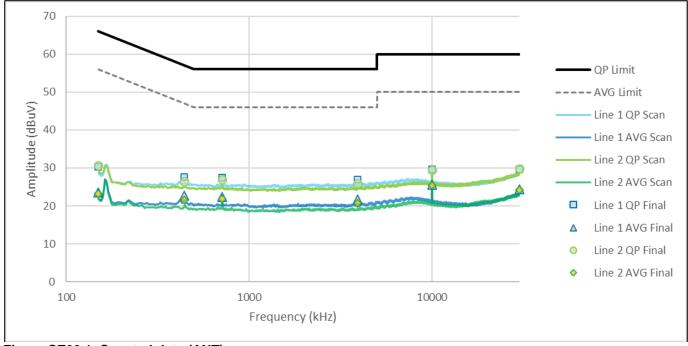


Figure CE02.1: Spectral data (ANT)

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Setup Photographs

Image removed for client confidentiality.
See section 1 of this report to identify the report where the photos may be viewed.

Figure CE02.2: Test setup, first view

Image removed for client confidentiality.

See section 1 of this report to identify the report where the photos may be viewed.

Figure CE02.3: Test setup, second view

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Concluding Notes

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