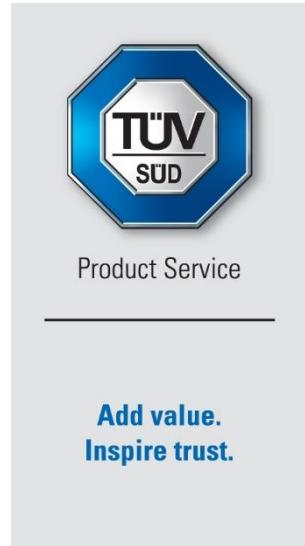


Report on the FCC and IC Testing of the
 Marquardt GmbH NFC door handle
 Model: HH1
 In accordance with FCC 47 CFR Part 15 C
 and ISED RSS-210 and ISED RSS-GEN

Prepared for:

Marquardt GmbH
 Schloss-Str. 16
 78604 Rietheim-Weilheim
 Germany

FCC ID: IYZHH1
 IC: 2701A-HH1



COMMERCIAL-IN-CONFIDENCE

Date: 2021-06-11

Document Number: TR-33652-09346-02 | Issue 1

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Project Management	Alex Fink	2021-06-11	 SIGN-ID 519050
Authorised Signatory	Matthias Stumpe	2021-06-14	 SIGN-ID 519536

Signatures in this approval box have checked this document in line with the requirements of TÜV SÜD Product Service document control rules.

Engineering Statement:

This measurement shown in this report were made in accordance with the procedures described on test pages.
 All reported testing was carried out on a sample equipment to demonstrate limited compliance with FCC 47 CFR Part 15 C and ISED RSS-210 and RSS-GEN.

The sample tested was found to comply with the requirements defined in the applied rules.

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Testing	Alex Fink	2021-06-11	 SIGN-ID 519050
Laboratory Accreditation DAkkS Reg. No. D-PL-11321-11-02 DAkkS Reg. No. D-PL-11321-11-03	Laboratory recognition Registration No. BNetzA-CAB-16/21-15	Industry Canada test site registration 3050A-2	

Executive Statement:

A sample of this product was tested and found to be compliant with FCC 47 CFR Part 15 C:2019 and ISED RSS-210:2020 and RSS-GEN:2019

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Annex B to Test Report TR-33652-09346-02 | Issue: 01

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1 Report Summary

1.1 Modification Report

Alternations and additions of this report will be issued to the holders of each copy in the form of a complete document.

Issue	Description of changes	Date of Issue
1	First Issue	2021-06-11

Table 1: Report of Modifications

1.2 Introduction

Applicant	Marquardt GmbH
Manufacturer	Marquardt GmbH
Model Number(s)	HH1
HVIN	KA4N
Serial Number(s)	8421000064196010
Hardware Version(s)	H13
Software Version(s)	21.04.02
Number of Samples Tested	1
Test Specification(s) /	FCC 47 CFR Part 15 C: 2019
Issue / Date	ISED RSS-210, Issue 10, Amendment 1: 2020 ISED RSS-GEN, Issue 5, Amendment 1: 2019
Test Plan/Issue/Date	---
Order Number	6200452275-I51
Date	2021-01-12
Date of Receipt of EUT	2021-03-24
Start of Test	2021-04-07
Finish of Test	2021-04-30
Name of Engineer(s)	Alex Fink
Related Document(s)	ANSI C63.10: 2013



1.3 Brief Summary of Results

A brief summary of the tests carried out in accordance with FCC 47 CFR Part 15 C, ISED RSS-210 and ISED RSS-GEN is shown below.

Section	Specification Clause	Test Description	Result
12 V power supply – Continuously transmitting			
2.1	15.209, 15.225	Radiated Disturbance	Pass
2.2	15.212 (1)(viii)	RF Exposure	Pass

Table 2: Results according to FCC 47 CFR Part 15 C

Section	Specification Clause	Test Description	Result
12 V power supply – Continuously transmitting			
2.1	A.1.1	Radiated Emissions	Pass

Table 3: Results according to ISED RSS-210

Section	Specification Clause	Test Description	Result
12 V power supply – Continuously transmitting			
2.1	8.9, 8.10	Radiated Emissions	Pass
2.2	3.4	RF Exposure	Pass

Table 4: Results according to RSS-Gen



1.4 Product Information

Functional description

The HH1 is a door handle for a car with capacitive touch sensors and NFC. An integrated NFC antenna inside into the door handle, smartphones, wearables and NFC tags can be identified and a driver can be authorized by the car so the door can be opened.

The HH1 is connected to the car using a CAN-FD interface. It acts as communication channel between CAR Electronics control Unit and NFC Readers. The car ECU NFC Reader requests to the HH1 which communicates with the NFC device on the integrated antenna using a magnetic field.

User manual

The user places his authorized NFC device (a smartcard or a mobile phone / wearable with an integrated secure element ID) onto the door handle. The HH1 authorizes the user to the car automatically as soon as a valid device is recognized. Then the door is unlocked and the driver can access the car. The NFC communication is only activated once a NFC device is placed onto the door handle.

Test mode

For the radio testing, a test mode is configured in software. After providing the power supply, HH1 will transmit continuously at 13.56 MHz.

Technical Data

Temperature Range

Working temperature:	-40 °C to +80 °C
Storage temperature:	-40 °C to +85 °C

Data of RF-Part

Transmission Mode

Continuous Transmission mode

Reader to card

100 % ASK, Miller Coded, 106 kbit/s

Card to reader

Subcarrier Load Modulation, Manchester Coded, 106 kbit/s

Transmission center frequency

13.56 MHz

3 dB bandwidth

400 kHz

Maximum magnetic field strength

7.5 A/m

Antenna

Flex loop antenna, approx. 60x13 mm.

1.5 EUT Modifications Record

The table below details modifications made to the EUT during the test programme.

The modifications incorporated during each test are recorded on the appropriate test pages.

Modification State	Description of Modification still fitted to EUT	Modification Fitted By	Date Modification Fitted
0	As supplied by the customer, S/N: 8421000064196010 - test sample with antenna	Not Applicable	Not Applicable

Table 5

1.6 Test Location

TÜV SÜD Product Service conducted the following tests at our Straubing test laboratory:

Test Name	Name of Engineer(s)
Configuration and Mode: 12 V power supply – Continuously polling	
Radiated Emissions	Alex Fink
RF Exposure	Alex Fink

Office Address:

Äußere Frühlingstraße 45
94315 Straubing
Germany



2 Test Details

2.1 Radiated emissions

2.1.1 Specification Reference

FCC 47 CFR Part 15 C, Clauses 15.205, 15.209 and 15.225
ISED RSS-210, Clause 7.7 and B.6
ISED RSS-Gen, Clause 8.9 and 8.10

2.1.2 Equipment under Test and Modification State

HH1, S/N: 8421000064196010 - Modification State 0

2.1.3 Date of Test

2020-04-07 and 2020-04-30

2.1.4 Environmental Conditions

Ambient Temperature	22 °C
Relative Humidity	33 %



2.1.5 Specification Limits

<i>Radiated emission limits:</i>					
<i>Frequency Range (MHz)</i>	<i>Test distance (m)</i>	<i>Field strength</i>		<i>Field strength</i>	
		<i>(μA/m)</i>	<i>(dBμA/m)</i>	<i>(μV/m)</i>	<i>(dBμV/m)</i>
0.009 – 0.49	300	6.37 / <i>f</i>	20*lg(6.37 / <i>f</i>)	2400 / <i>f</i>	20*lg(2400 / <i>f</i>)
0.49 – 1.705	30	63.7 / <i>f</i>	20*lg(63.7 / <i>f</i>)	24000 / <i>f</i>	20*lg(24000 / <i>f</i>)
1.705 – 13.110	30	0.08	-21.94	30	29.54
13.110 – 13.410	30	0.283	-11.0	106	40.5
13.410 – 13.553	30	0.891	-1.0	334	50.5
13.553 – 13.567	30	42.26	32.5	15848	84
13.567 – 13.710	30	0.891	-1.0	334	50.5
13.710 – 14.010	30	0.283	-11.0	106	40.5
14.010 - 30	30	0.08	-21.94	30	29.54
30 – 88	3	---	---	100	40
88 – 216	3	--	---	150	43.5
126 – 960	3	--	---	200	46
above 960	3	--	---	500	54

Note 1: *f* in kHz

2.1.6 Test Method

The test was performed according to ANSI C63.10, sections 11.11 and 11.12

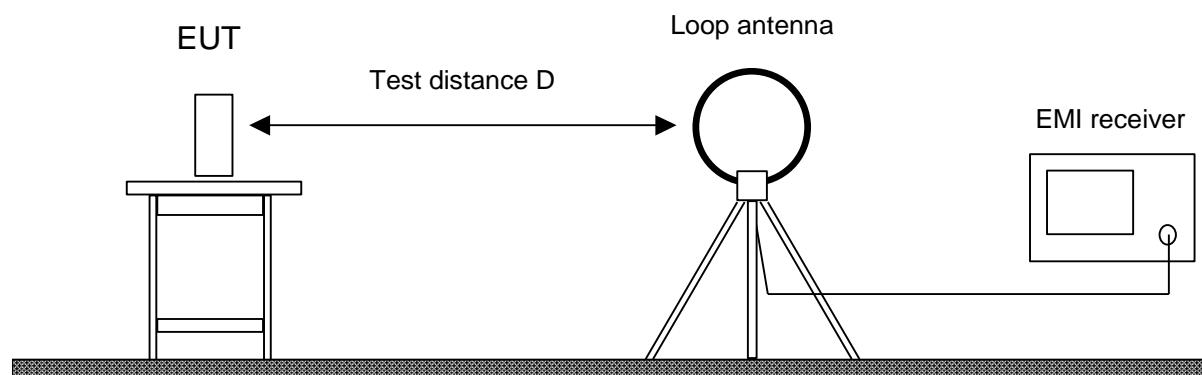
Prescans are performed in six positions of the EUT to get the full spectrum of emission caused by the EUT with the measuring antenna raised and lowered from 1 m to 4 m with vertical and horizontal polarisation to find the combination of table position, antenna height and antenna polarisation for the maximum emission levels.

Data reduction is applied to these results to select those levels having less margin than 10 dB or exceeding the limit using subranges and limited number of maximums.

Further maximisation for adjusting the maximum position is following.

Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

2.1.6.1 Frequency range 9 kHz – 30 MHz

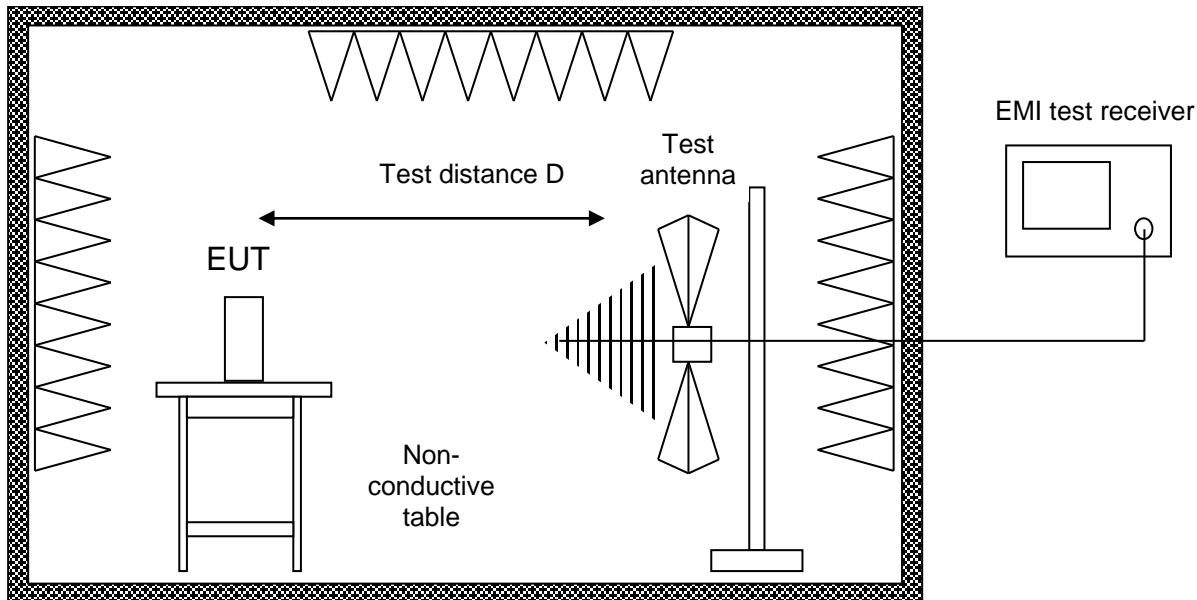


The EUT was placed on a non-conductive table, 0.8 m above the ground.

Radiated emissions in the frequency 9 kHz – 30 MHz is measured within a semi-anechoic room with an active loop antenna with the measurement detector set to peak. In addition, in the frequency range 9 kHz to 490 kHz also an average detector was used. The measurement bandwidth of the receiver was set to 300 Hz in the frequency range 9 kHz to 150 kHz and 10 kHz in the frequency range 150 kHz to 30 MHz. Prescans were performed in six positions of the EUT.

For final measurements the detector was set to CISPR quasi-peak and in addition to CISPR average in the frequency range 9 kHz to 490 kHz with a resolution bandwidth 200 Hz in the frequency range 9 kHz to 150 kHz and 9 kHz in the frequency range 150 kHz to 30 MHz. Final tests were performed immediately after a final frequency and zoom (for drifting disturbances) and maximum adjustment.

2.1.6.2 Frequency range 30 MHz – 1 GHz



Alternate test site (semi anechoic room)

The EUT was placed on a non-conductive table, 0.8 m above the ground plane. Radiated emissions in the frequency range 30 MHz – 1 GHz is measured within a semi-anechoic room with groundplane complying with the NSA requirements of ANSI C63.4. for alternative test sites. A linear polarised logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna") is used.

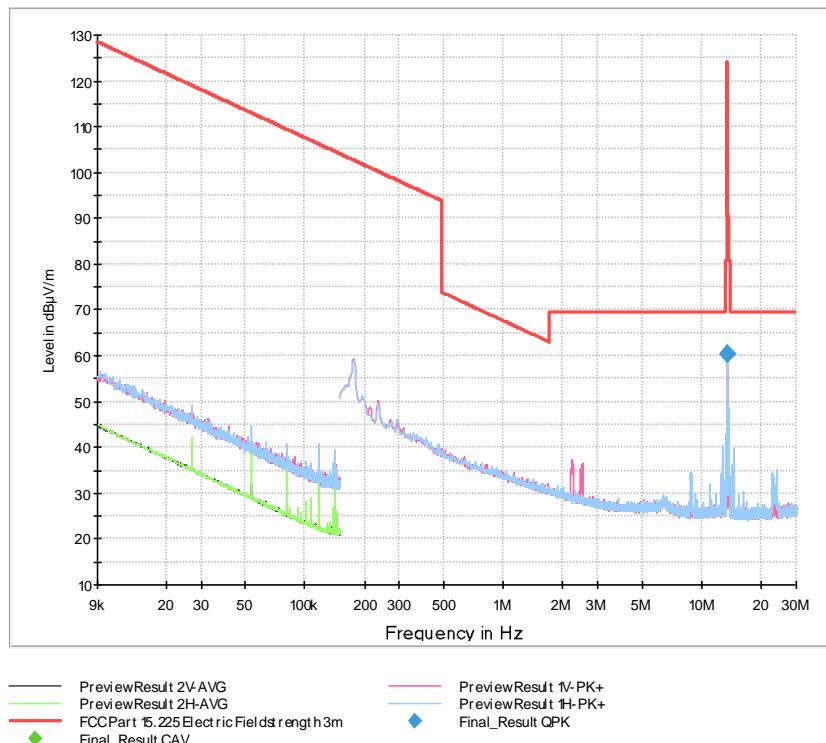
For prescan tests the test receiver is set to peak-detector with a bandwidth of 120 kHz. With the measurement bandwidth of the test receiver set to 120 kHz CISPR quasi-peak detector is selected for final measurements following immediately after a final frequency zoom (for drifting disturbances) and maximum adjustment.

2.1.7 Test Results

Sample calculation:

$$\text{Final Value (dB}\mu\text{V/m)} = \text{Reading Value (dB}\mu\text{V)} + (\text{Cable attenuation (dB)} + \text{Antenna Transducer (dB(1/m)))}$$

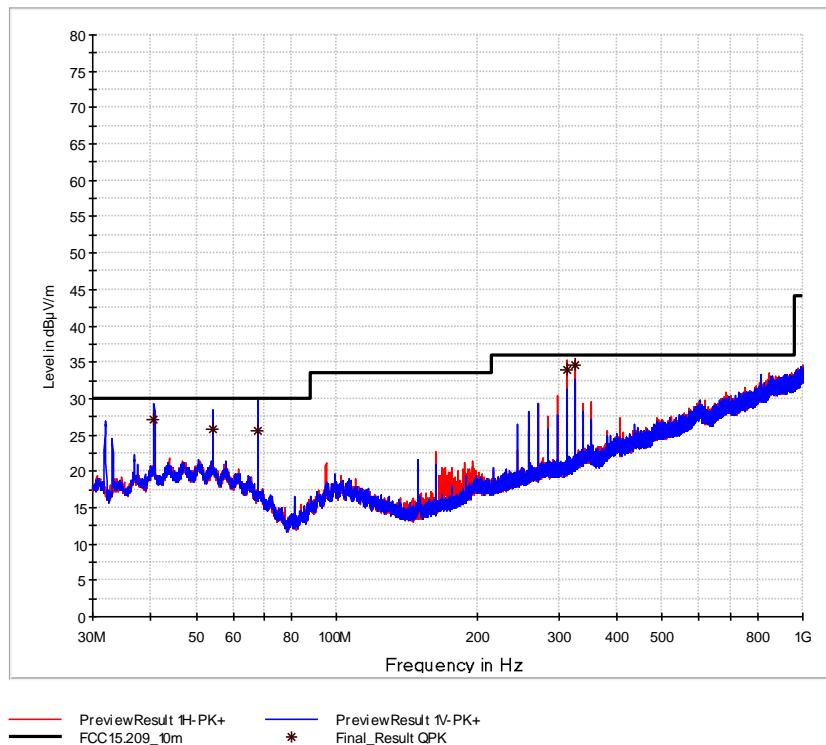
12 V DC power supply – reading RFID card



Final Results:

Frequency MHz	Qua- siPeak dB μ V/m	CAver- age dB μ V/m	Limit dB μ V/m	Mar- gin dB	Meas. Time ms	Band- width kHz	Height cm	Pol	Azi- muth deg	Corr. dB/m
13.560000	60.22	---	124.00	63.78	1000.0	9.000	100.0	H	0.0	18.9

12 V DC power supply – Continuously transmitting



Final Results:

Frequency MHz	QuasiPeak dB μ V/m	Limit dB μ V/m	Margin dB	Meas. Time ms	Bandwidth kHz	Height cm	Pol	Azimuth deg	Corr. dB/m
40.680000	27.20	30.00	2.80	1000.0	120.000	336.0	V	-119.0	17.1
54.240000	25.86	30.00	4.14	1000.0	120.000	110.0	V	136.0	18.3
67.800000	25.56	30.00	4.44	1000.0	120.000	107.0	V	-125.0	15.5
311.880000	33.88	36.00	2.12	1000.0	120.000	280.0	H	139.0	19.4
325.440000	34.64	36.00	1.36	1000.0	120.000	192.0	H	127.0	20.0

2.1.8 Test Location and Test Equipment

The test from 9 kHz to 30 MHz was carried out in Semi anechoic room - cabin no. 11
The test from 30 MHz to 1GHz was carried out in Semi anechoic room - cabin no. 8

<i>Instrument</i>	<i>Manufacturer</i>	<i>Type No</i>	<i>TE No</i>	<i>Calibration Period (months)</i>	<i>Calibration Due</i>
EMI test receiver	Rohde & Schwarz	ESW44	39897	12	2022-04-30
Loop antenna	Schwarzbeck	FMZB 1519 B	44334	36	2023-01-31
TRILOG Broadband Antenna	Rohde & Schwarz	VULB 9162	20116	36	2022-01-31
EMC measurement software	Rohde & Schwarz	EMC32 Emission K8 - V10.50.10	42986	---	---
EMC measurement software	Rohde & Schwarz	EMC32 Emission K11 - V10.50.10	42986	---	---
Semi Anechoic Room	Albatross	Cabin No. 8	19917	36	2023-10-31
Semi Anechoic Room	Frankonia	Cabin No. 11	42961	36	2022-08-31

Table 6



2.2 RF Exposure

2.2.1 Specification Reference

FCC 47 CFR Part 2 J, Clause 2.1093

KDB 447498 D01 V06, section 4.3.1

ISED RSS-Gen, Clause 3.4

ISED RSS-102, Clause

2.2.2 Equipment under Test and Modification State

HH1, S/N: 8421000064196010 - Modification State 0

2.2.3 Date of Test

2021-04-07

2.2.4 Environmental Conditions

Ambient Temperature	22 °C
Relative Humidity	33 %

2.2.5 Test Method

Estimation is based on output power test.

For details please refer to section 2.1.7 of this test report.

2.2.6 Specification Limits

FCC 47 CFR Part 15 C, Clause 15.212(viii)

Systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy levels in excess of the Commission's guideline. Acc. to KDB 477498:

The 1 g and 10 g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separations distances ≤ 50 mm are determined by:

$$\frac{\text{max. power of channel, incl. tune-up tol., mW}}{\text{min. test separation distance, mm}} \cdot \sqrt{f, \text{GHz}} \leq \begin{cases} 3.0 & \text{for 1 g} \\ 7.5 & \text{for 10 g} \end{cases} \text{extremity SAR}$$

1. f (GHz) is the RF channel frequency in GHz;
2. Power and distance are rounded to the nearest mW and mm before calculation;
3. The result is rounded to one decimal place for comparison;
4. 3.0 and 7.5 are referred to as the numeric thresholds

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm, and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied.

ISED RSS-102, Clause 2.5.1

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in the table.

For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in the table, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.

For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.:.

Frequency (MHz)	Exemption limits (mW) ¹ at separation distance of									
	≤5 mm	10 mm	15 mm	20 mm	25 mm	30 mm	35 mm	40 mm	45 mm	≥50 mm
≤300 ²	71	101	132	162	193	223	254	284	315	345
450	52	70	88	106	123	141	159	177	195	213
835	17	30	42	55	67	80	92	105	117	130
1900	7	10	18	34	60	99	153	225	316	431
2450	4	7	15	30	52	83	123	173	235	309
3500	2	6	16	32	55	86	124	170	225	290
5800	1	6	15	27	41	56	71	85	97	106

¹ The exemption limit in the table are based on measurements and simulations on half-wave dipole antennas at separation distances of 5 mm to 25 mm from a flat phantom, providing a SAR value of approximately 0.4 W/kg for 1 g of tissue. For low frequencies (300 MHz to 835 MHz), the exemption limits are derived from a linear fit. For high frequencies (1900 MHz and above), the exemption limits are derived from a third order polynomial fit.

² Transmitters operating between 3 kHz and 10 MHz, meeting the exemption from routine SAR evaluation, shall demonstrate compliance to the instantaneous limits in IC RSS-102, issue 5, section 4.



2.2.7 Test Results

acc. to KDB 447498 D01:

Maximum Radiated Power (EIRP) Pmax: -35.00 dBm = 316 nW
(see section 2.1.7 for measurement)
Compliance Boundary d: 5 mm
Frequency f: 13.56 MHz

Calculation according to Section 4.3.1

1. $\frac{1}{2} \left[1 + \log \left(\frac{100}{100} \right) \right] * \left[\left(\text{Power allowed at numeric threshold for 50 mm in step a} \right) + (50\text{mm} - 50\text{mm}) * \left(\frac{100}{150} \right) \right]$
2. $\frac{1}{2} [1 + 0] * \left[\left(\text{Power allowed at numeric threshold for 50 mm in step a} \right) + 0 * \left(\frac{100}{150} \right) \right]$
3. $\frac{1}{2} [\text{Power allowed at numeric threshold for 50 mm in step a}]$
4. $\frac{\text{max power}}{\text{min distance}} * \sqrt{f} \leq 3.0$
5. $\text{max power} \leq \frac{3.0 * \text{min distance}}{\sqrt{f}}$
6. $\text{max power} \leq \frac{3.0 * 50 \text{ mm}}{\sqrt{0,1 \text{ GHz}}} = 474 \text{ mW}$
7. $\frac{1}{2} * 474 \text{ mW} = 237 \text{ mW} \rightarrow \text{maximal allowed Power}$
8. $316 \text{ nW} < 237 \text{ mW} \rightarrow \text{criteria fulfilled}$



IC RSS-GEN Issue 5, section 3.2 and IC RSS-102, Issue 5, section 2.5

Exposure of Humans to RF Fields		Applicable	Declared by applicant	Measured	Exemption
The antenna is					
<input type="checkbox"/> detachable					
The conducted output power (CP in watts) is measured at the antenna connector:					
CP =					
The effective isotropic radiated power (EIRP in watts) is calculated using					
<input type="checkbox"/> the numerical antenna gain: G =		<input type="checkbox"/>			
$EIRP = G \cdot CP \Rightarrow EIRP =$					
<input type="checkbox"/> the field strength ³ in V/m: FS = V/m			<input type="checkbox"/>		
$EIRP = \frac{(FS \cdot D)^2}{30} \Rightarrow EIRP =$ mW					
with:					
Distance between the antennas in m: D = mm		<input type="checkbox"/>			
<input checked="" type="checkbox"/> not detachable					
A field strength measurement is used to determine the effective isotropic radiated power (EIRP in watts) given by:					
$EIRP = \frac{(FS \cdot D)^2}{30} \Rightarrow EIRP = 0.316 \mu W$					
with:					
Field strength in V/m: FS = 60.22 dB μ V/m				<input checked="" type="checkbox"/>	
Distance between the two antennas in m: D = 3 m				<input checked="" type="checkbox"/>	
Selection of output power					
The output power TP is the higher of the conducted or effective isotropic radiated power (e.i.r.p.):					
$TP = 0.316 \mu W$					

³ The conversion formula is valid only for properly matched antennas. In other cases the transmitter output power may have to be measured by a terminated measurement when applying the exemption clauses.

If an open area test site is used for field strength measurement, the effect due to the metal ground reflecting plane should be subtracted from the maximum field strength value in order to reference it to free space, before calculating TP.



Exposure of Humans to RF Fields (continued)		Applicable	Declared by applicant	Measured	Exemption
Separation distance between the user and the transmitting device is					
<input checked="" type="checkbox"/> less than or equal to 20 cm	<input type="checkbox"/> greater than 20 cm		<input checked="" type="checkbox"/>		
Transmitting device is					
<input type="checkbox"/> in the vicinity of the human head	<input type="checkbox"/> body-worn		<input type="checkbox"/>		

SAR evaluation										
SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in the table.										
For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in the table, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.										
For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.										
Frequency (MHz)										
Exemption limits (mW) ⁴ at separation distance of										

3 Measurement Uncertainty

For a 95% confidence level, the measurement uncertainties for defined systems are:

The measurement uncertainty in the laboratory is less than or equal to the maximum measurement uncertainty according to CISPR16-4-2: 2011 + A1 + A2 + Cor1 (U_{CISPR}). This normative regulation means that the measured value is also the value to be assessed in relation to the limit value.

Radio Interference Emission Testing		<i>kp</i>	Expanded Uncertainty
Test Name			
Conducted Voltage Emission			
9 kHz to 150 kHz (50Ω/50µH AMN)	2	± 3.8 dB	
150 kHz to 30 MHz (50Ω/50µH AMN)	2	± 3.4 dB	
100 kHz to 200 MHz (50Ω/5µH AMN)	2	± 3.6 dB	
Discontinuous Conducted Emission			
9 kHz to 150 kHz (50Ω/50µH AMN)	2	± 3.8 dB	
150 kHz to 30 MHz (50Ω/50µH AMN)	2	± 3.4 dB	
Conducted Current Emission			
9 kHz to 200 MHz	2	± 3.5 dB	
Magnetic Fieldstrength			
9 kHz to 30 MHz (with loop antenna)	2	± 3.9 dB	
9 kHz to 30 MHz (large-loop antenna 2 m)	2	± 3.5 dB	
Radiated Emission			
30 MHz to 300 MHz	2	± 4.9 dB	
300 MHz to 1 GHz	2	± 5.0 dB	
1 GHz to 6 GHz	2	± 4.6 dB	
Test distance 10 m			
30 MHz to 300 MHz	2	± 4.9 dB	
300 MHz to 1 GHz	2	± 4.9 dB	
The expanded uncertainty reported according to CISPR16-4-2: 2011 + A1 + A2 + Cor1 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$			

Table 7 Measurement uncertainty based on CISPR 16-4-2



<i>Radio Interference Emission Testing</i>		
<i>Test Name</i>	<i>kp</i>	<i>Expanded Uncertainty</i>
Occupied Bandwidth	2	$\pm 5\%$
Conducted Power		
9 kHz \leq f < 30 MHz	2	± 1.0 dB
30 MHz \leq f < 1 GHz	2	± 1.5 dB
1 GHz \leq f \leq 40 GHz	2	± 2.5 dB
1 MS/s power sensor (TS8997)	2	± 1.5 dB
Occupied Bandwidth	2	$\pm 5\%$
Power Spectral Density	2	± 3.0 dB
Radiated Power		
9 kHz \leq f < 26.5 GHz	2	± 6.5 dB
26.5 GHz \leq f < 60 GHz	2	± 8.0 dB
60 GHz \leq f < 325 GHz	2	± 10 dB
Conducted Spurious Emissions	2	± 3.0 dB
Radiated Spurious Emissions	2	± 6.0 dB
Voltage		
DC	2	$\pm 1.0\%$
AC	2	$\pm 2.0\%$
Time (automatic)	2	$\pm 5\%$
Frequency	2	$\pm 10^{-7}$

The expanded uncertainty reported according to ETSI TR 100 028:2001 is based on a standard uncertainty multiplied by a coverage factor of $kp = 2$, providing a level of confidence of $p = 95.45\%$

Table 8 Measurement uncertainty based on ETSI TR 100 028