

INTERTEK TESTING SERVICES

MEASUREMENT/TECHNICAL REPORT

Pollyflame Concept (HK) Ltd. - MODEL: Crayola Walkie Talkie 541.634
FCC ID: LOH541634

July 4, 1998

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

Equipment Type: Low Power Transmitter (example: computer, printer, modem, etc.)

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

If yes, defer until:
date

Company Name agrees to notify the Commission by:
date

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

Transition Rules Request per 15.37? Yes No X

If no, assumed Part 15, Subpart C for intentional radiator - the new 47 CFR [10-1-96 Edition] provision.

Report prepared by:

C. K. Lam
Intertek Testing Services
2/F., Garment Center,
576, Castle Peak Road,
HONG KONG
Phone: 852-2746-8211
Fax: 852-2785-5487

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1.3 Test Methodology

Both AC mains line-conducted and radiated emission measurements were performed according to the procedures in ANSI C63.4 (1992). All measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. For each scan, the procedure for maximizing emissions in Appendices D and E were followed. All Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section**" of this Application.

1.4 Test Facility

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

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EXHIBIT 2

SYSTEM TEST CONFIGURATION

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2.0 System Test Configuration

2.1 Justification

The equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). The EUT was mounted to a cardboard box, which enabled the engineer to maximize emissions through its placement in the three orthogonal axes.

The EUT was powered from a new 9V battery.

For maximizing emissions, the EUT was rotated through 360°, the antenna height was varied from 1 meter to 4 meters above the ground plane, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data reported in Exhibit 3.0.

The unit was operated standalone and placed in the center of the turntable.

For simplicity of testing, the unit was wired to transmit continuously.

2.2 EUT Exercising Software

There was no special software to exercise the device. Once the button is depressed, the unit transmits the typical signal. For simplicity of testing, the unit was wired to transmit continuously.

2.3 Special Accessories

There are no special accessories necessary for compliance of this product.

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2.4 Equipment Modification

Any modifications installed previous to testing by Pollyflame Concept (HK) Ltd. will be incorporated in each production model sold/leased in the United States.

No modifications were installed by Intertek Testing Services.

2.5 Support Equipment List and Description

This product was tested in a standalone configuration.

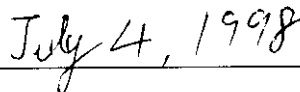
All the items listed under section 2.0 of this report are

Confirmed by:

*C. K. Lam
Assistant Manager
Intertek Testing Services
Agent for Pollyflame Concept (HK) Ltd.*



Signature



Date

INTERTEK TESTING SERVICES

EXHIBIT 3

EMISSION RESULTS

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3.0 Emission Results

Data is included worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

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3.1 Field Strength Calculation

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

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

where FS = Field Strength in dB μ V/m

RA = Receiver Amplitude (including preamplifier) in dB μ V

CF = Cable Attenuation Factor in dB

AF = Antenna Factor in dB

AG = Amplifier Gain in dB

PD = Pulse Desensitization in dB

AV = Average Factor in -dB

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

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

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3.1 Field Strength Calculation (cont)

Example

Assume a receiver reading of 62.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted. The pulse desensitization factor of the spectrum analyzer was 0 dB, and the resultant average factor was -10 dB. The net field strength for comparison to the appropriate emission limit is 32 dB μ V/m. This value in dB μ V/m was converted to its corresponding level in μ V/m.

$$RA = 62.0 \text{ dB}\mu\text{V}$$

$$AF = 7.4 \text{ dB}$$

$$CF = 1.6 \text{ dB}$$

$$AG = 29.0 \text{ dB}$$

$$PD = 0 \text{ dB}$$

$$AV = -10 \text{ dB}$$

$$FS = 62 + 7.4 + 1.6 - 29 + 0 + (-10) = 32 \text{ dB}\mu\text{V/m}$$

$$\text{Level in mV/m} = \text{Common Antilogarithm} [(32 \text{ dB}\mu\text{V/m})/20] = 39.8 \mu\text{V/m}$$

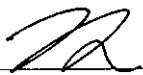
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3.3 Radiated Emission Data

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Judgement: Passed by 4.1 dB

TEST PERSONNEL:



Signature

Ken C. C. Lam, Compliance Engineer
Typed/Printed Name

July 4, 1998
Date

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Company: Pollyflame Concept (HK) Ltd.
Model: Crayola Walkie Talkie 541.634

Date of Test: July 1, 1998

Table 1

Radiated Emissions

Polarity	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre- Amp Gain (dB)	Net at 3m (dB μ V/m)	Limit at 3m (dB μ V/m)	Margin (dB)
V	49.858	64.4	11	16	59.4	80.0	-20.6
H	149.574	42.4	13	16	39.4	43.5	-4.1
H	199.432	26.5	16	16	26.5	43.5	-17.0
H	249.290	32.2	20	16	36.2	46.0	-9.8
H	299.148	34.2	22	16	40.2	46.0	-5.8

- Notes:
1. Peak Detector Data unless otherwise stated.
 2. All measurements were made at 3 meter. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative value in the margin column shows emission below limit.
 4. Horn antenna and average detector are used for the emission over 1000MHz.
- *Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: Ken C. C. Lam

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EXHIBIT 4

EQUIPMENT PHOTOGRAPHS

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4.0 Equipment Photographs

Photographs of the tested EUT are attached.

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EXHIBIT 8

MISCELLANEOUS INFORMATION

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8.0 Miscellaneous Information

This miscellaneous information includes details of the measured bandwidth, the test procedure and calculation of factors such as pulse desensitization and averaging factor.

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8.1 Measured Bandwidth

The plot on the following page shows the fundamental emission is confined in the specified band. The field strength of any emission appearing between the band edges and up to 10 kHz above the below the band edges (49.81 and 49.9 MHz) is at least 67.32 dB below the carrier level. It meets the requirement of Section 15.235(b).

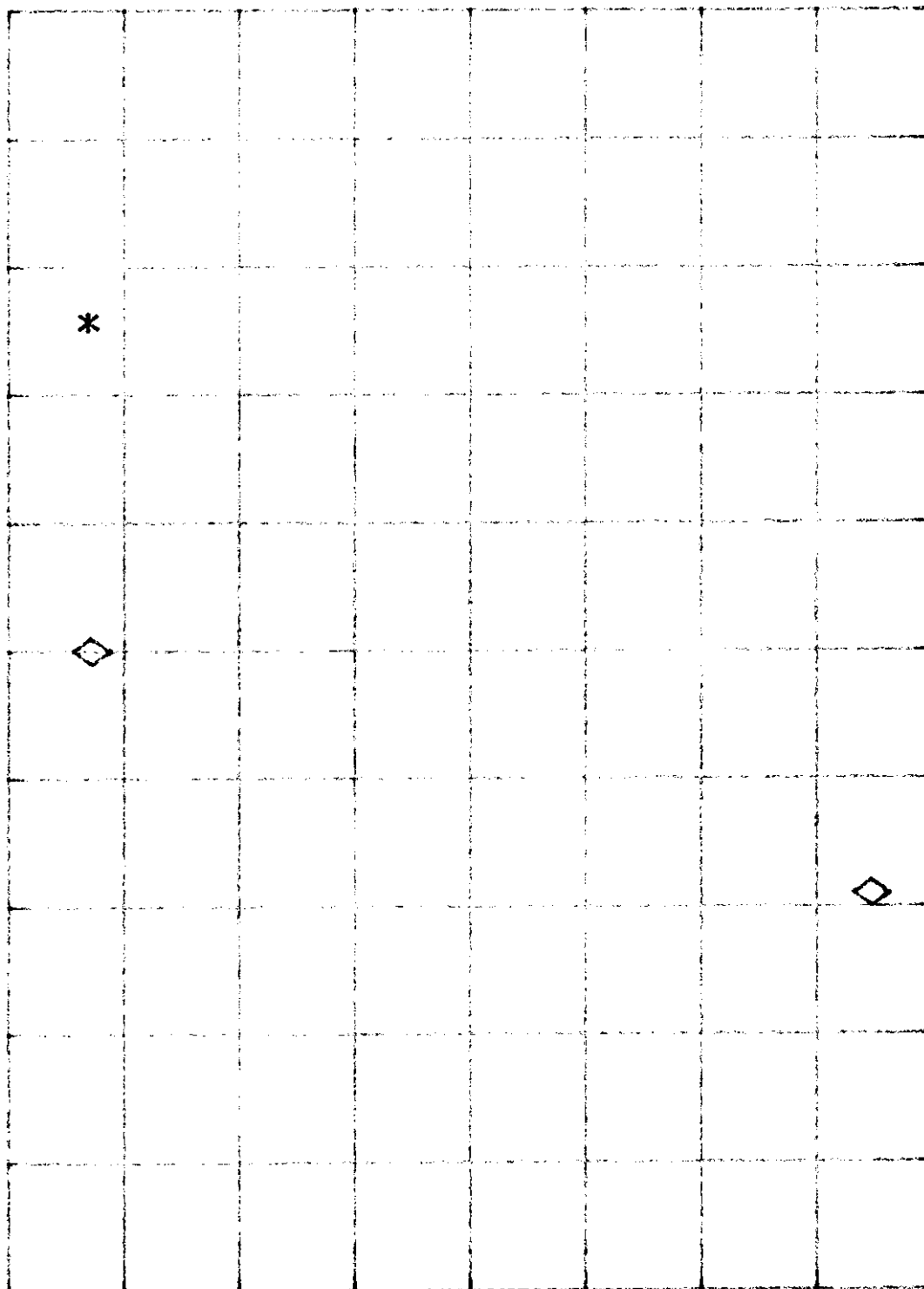
Figure 8.1 Bandwidth

hp

MKR -38.0 KHZ
-67.60 dB

REF 107.0 dBμV AT 10 dB

PEAK
LOG
10
dB/



VA SB
SC FC
CORR

CENTER 49.8580 MHz
#RES BW 3.0 KHZ
SPAN 200.0 KHZ
SWP 100 msec
#VBW 3 MHz

hp

MKA 42.0 KHZ
-67.32 dB

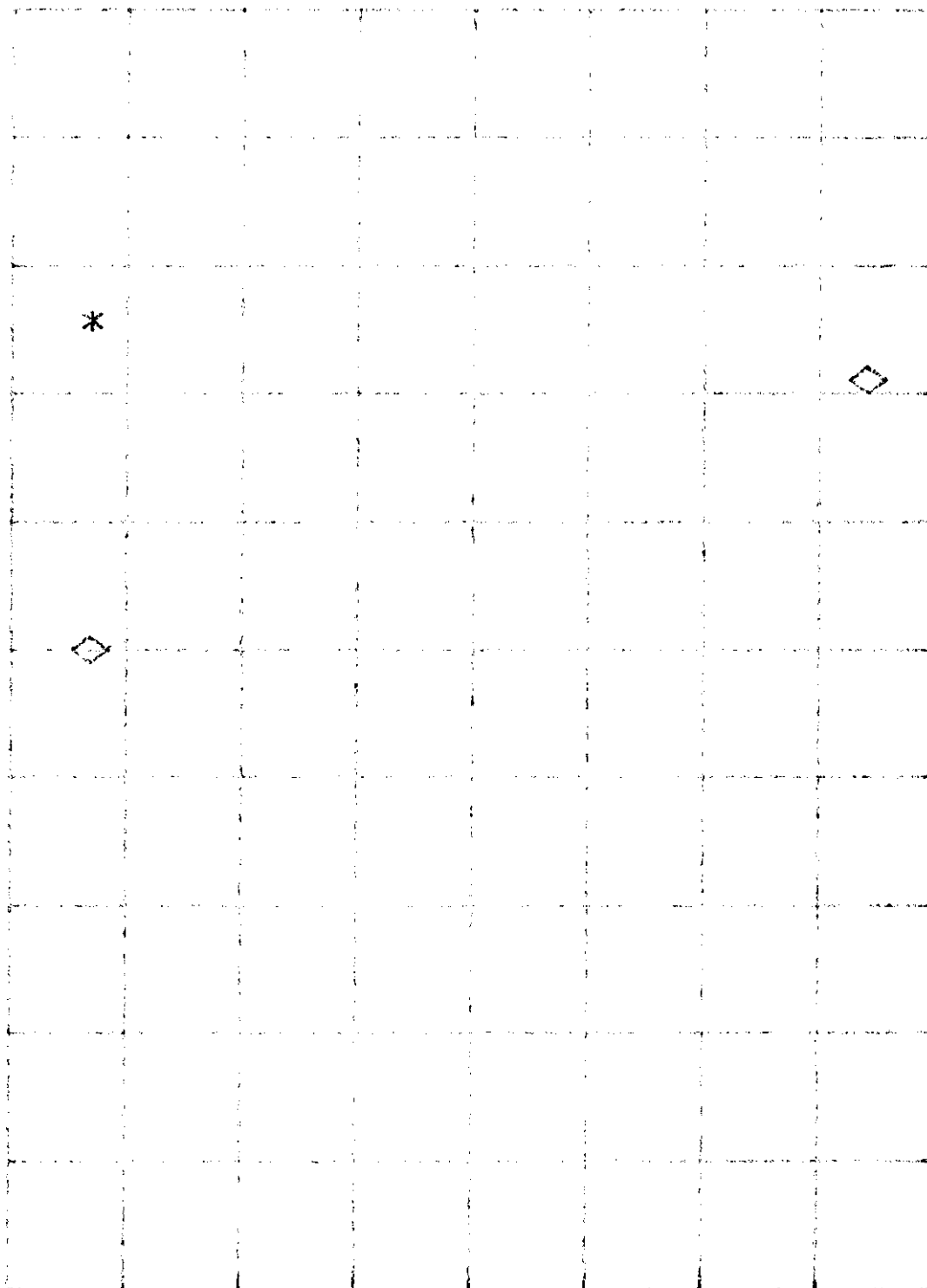
REF 107.0 dBμV AT 10 dB

PEAK

LOG

10

dB/



VA SB
SC FC
CORR

CENTER 49.8580 MHZ
#RES BW 3.0 KHZ
SPAN 200.0 KHZ
SWP 100 msec
#VBW 3 MHZ

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8.2 Discussion of Pulse Desensitization

The determination of pulse desensitivity was made in accordance with Hewlett Packard Application Note 150-2, *Spectrum Analysis ... Pulsed RF*.

Pulse desensitivity is not applicable for this device.

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8.3 Calculation of Average Factor

Averaging factor in dB = $20 \log (\text{duty cycle})$

The specification for output field strengths in accordance with the FCC rules specify measurements with an average detector. During testing, a spectrum analyzer incorporating a peak detector was used. Therefore, a reduction factor can be applied to the resultant peak signal level and compared to the limit for measurement instrumentation incorporating an average detector.

The time period over which the duty cycle is measured is 100 milliseconds, or the repetition cycle, whichever is a shorter time frame. The worst case (highest percentage on) duty cycle is used for the calculation. The duty cycle is measured by placing the spectrum analyzer in zero scan (receiver mode) and linear mode at maximum bandwidth (3 MHz at 3 dB down) and viewing the resulting time domain signal output from the analyzer on a Tektronix oscilloscope. The oscilloscope is used because of its superior time base and triggering facilities.

This device does not use the pulse code modulation. It is not necessary to apply average factor to the measuring result.

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8.4 Emissions Test Procedures

The following is a description of the test procedure used by Intertek Testing Services in the measurements of transmitters operating under Part 15, Subpart C rules.

The test set-up and procedures described below are designed to meet the requirements of ANSI C63.4 - 1992.

The transmitting equipment under test (EUT) is attached to a cardboard box and placed on a wooden turntable which is four feet in diameter and approximately one meter in height above the ground plane. During the radiated emissions test, the turntable is rotated and any cables leaving the EUT are manipulated to find the configuration resulting in maximum emissions. The cardboard box is adjusted through all three orthogonal axes to obtain maximum emission levels. The antenna height and polarization are varied during the testing to search for maximum signal levels.

Detector function for radiated emissions is in peak mode. Average readings, when required, are taken by measuring the duty cycle of the equipment under test and subtracting the corresponding amount in dB from the measured peak readings. A detailed description for the calculation of the average factor can be found in Exhibit 8.3.

The frequency range scanned is from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or 40 GHz, whichever is lower. For line conducted emissions, the range scanned is 450 kHz to 30 MHz.

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8.4 Emissions Test Procedures (cont'd)

The EUT is warmed up for 15 minutes prior to the test.

AC power to the unit is varied from 85% to 115% nominal and variation in the fundamental emission field strength is recorded. If battery powered, a new, fully charged battery is used.

Conducted measurements are made as described in ANSI C63.4 - 1992.

The IF bandwidth used for measurement of radiated signal strength was 100 kHz or greater below 1000 MHz. Where pulsed transmissions of short enough pulse duration warrant, a greater bandwidth is selected according to the recommendations of Hewlett Packard Application Note 150-2. A discussion of whether pulse desensitivity is applicable to this unit is included in this report (See Exhibit 8.2). Above 1000 MHz, a resolution bandwidth of 1 MHz is used.

Transmitter measurements are normally conducted at a measurement distance of three meters. However, to assure low enough noise floor in the forbidden bands and above 1 GHz, signals are acquired at a distance of one meter or less. All measurements are extrapolated to three meters using inverse scaling, but those measurements taken at a closer distance are so marked.

INTERTEK TESTING SERVICES

MEASUREMENT/TECHNICAL REPORT

Pollyflame Concept (Hk) Ltd - MODEL: Crayola Walkie Talkie 541.634
FCC ID: LOH541634

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

Equipment Type: Superregenerative Receiver (example: computer, printer, modem, etc.)

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

If yes, defer until:
date

Company Name agrees to notify the Commission by:
date

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

Transition Rules Request per 15.37? Yes No X

If no, assumed Part 15, Subpart B for unintentional radiator - the new 47 CFR [10-1-96 Edition] provision.

Report prepared by:

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Phone: 852-2746-8211
Fax: 852-2785-5487

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8.0 Miscellaneous Information

This miscellaneous information includes details of the stabilizing process (including a plot of the stabilized waveform), the test procedure and calculation of factors such as pulse desensitization and averaging factor.

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8.1 Stabilization Waveform

Previous to the testing, the superregenerative receiver was stabilized as outlined in the test procedure. The plot on the following page shows the fundamental emission when a signal generator was used to stabilize the receiver. Please note that the antenna was placed as close as possible to the EUT for clear demonstration of the waveform and that accurate readings are not possible from this plot.

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1.3 Test Methodology

Both AC mains line-conducted and radiated emission measurements were performed according to the procedures in ANSI C63.4 (1992). All radiated measurements were performed in an Open Area Test Site. Preliminary scans were performed in the Open Area Test Site only to determine worst case modes. For each scan, the procedure for maximizing emissions in Appendices D and E were followed. All radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section**" of this Application.

1.4 Test Facility

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

INTERTEK TESTING SERVICES

EXHIBIT 2

SYSTEM TEST CONFIGURATION

INTERTEK TESTING SERVICES

2.0 System Test Configuration

2.1 Justification

The equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). The EUT was mounted to a cardboard box, which enabled the engineer to maximize emissions through its placement in the three orthogonal axes.

For maximizing emissions, the EUT was rotated through 360°, the antenna height was varied from 1 meter to 4 meters above the ground plane, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data reported in Exhibit 3.0.

The unit was operated standalone and placed in the center of the turntable.

The device was powered from a new 9V battery

2.2 EUT Exercising Software

There was no special software to exercise the device. Once the unit is powered up, it received continuously.

2.3 Support Equipment List and Description

This product was tested in standalone configuration.

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2.4 Equipment Modification

Any modifications installed previous to testing by Pollyflame Concept (HK) Ltd. will be incorporated in each production model sold/leased in the United States.

No modifications were installed by Intertek Testing Services.

2.5 Special Accessories

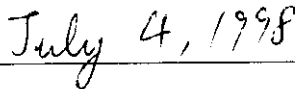
There are no special accessories necessary for compliance of this product.

Confirmed by:

*C. K. Lam
Assistant Manager - EMC
Intertek Testing Services
Hong Kong Ltd.
Agent for Pollyflame Concept (HK) Ltd.*



Signature



Date

INTERTEK TESTING SERVICES

EXHIBIT 3

EMISSION RESULTS

INTERTEK TESTING SERVICES

3.0 **Emission Results**

Data is included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

INTERTEK TESTING SERVICES

3.1 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

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

where FS = Field Strength in dB μ V/m

RA = Receiver Amplitude (including preamplifier) in dB μ V

CF = Cable Attenuation Factor in dB

AF = Antenna Factor in dB

AG = Amplifier Gain in dB

In the following table(s), the reading shown on the data table reflects the preamplifier gain. An example for the calculations in the following table is as follows:

$$FS = RR + LF$$

where FS = Field Strength in dB μ V/m

RR = RA - AG in dB μ V

LF = CF + AF in dB

Assume a receiver reading of 52.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB are added. The amplifier gain of 29 dB is subtracted, giving a field strength of 32 dB μ V/m. This value in dB μ V/m was converted to its corresponding level in μ V/m.

$$RA = 52.0 \text{ dB}\mu\text{V/m}$$

$$AF = 7.4 \text{ dB}$$

$$CF = 1.6 \text{ dB}$$

$$AG = 29.0 \text{ dB}$$

$$FS = RR + LF$$

$$FS = 23 + 9 = 32 \text{ dB}\mu\text{V/m}$$

$$RR = 23.0 \text{ dB}\mu\text{V}$$

$$LF = 9.0 \text{ dB}$$

$$\text{Level in mV/m} = \text{Common Antilogarithm} [(32 \text{ dB}\mu\text{V/m})/20] = 39.8 \mu\text{V/m}$$

INTERTEK TESTING SERVICES

3.3 Radiated Emission Data

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Judgement: Passed by 17.7 dB

*All readings are peak unless stated otherwise

TEST PERSONNEL:



Signature

Ken C. C. Lam, Compliance Engineer
Typed/Printed Name

July 4, 1998
Date

INTERTEK TESTING SERVICES

Company: Pollyflame Concept (HK) Ltd.
Model: Crayola Walkie Talkie 541.634

Date of Test: July 1, 1998

Table 1

FCC Class B Radiated Emissions

Polarity	Frequency (MHz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dB μ V/m)	Limit at 3m (dB μ V/m)	Margin (dB)
V	44.686	26.7	10	16	20.7	40	-19.3
V	45.229	27.4	10	16	21.4	40	-18.6
V	45.786	27.3	10	16	21.3	40	-18.7
V	46.372	27.0	11	16	22.0	40	-18.0
V	46.665	27.3	11	16	22.3	40	-17.7
V	47.243	27.3	11	16	22.3	40	-17.7
V	47.543	25.3	11	16	20.3	40	-19.7

- NOTES:
1. Negative sign in the column shows value below limit.
 2. Peak Detector Data.
 3. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distances were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.

Test Engineer: Ken C. C. Lam

INTERTEK TESTING SERVICES

EXHIBIT 4

EQUIPMENT PHOTOGRAPHS

INTERTEK TESTING SERVICES

4.0 Equipment Photographs

Photographs of the tested EUT are attached.

hp

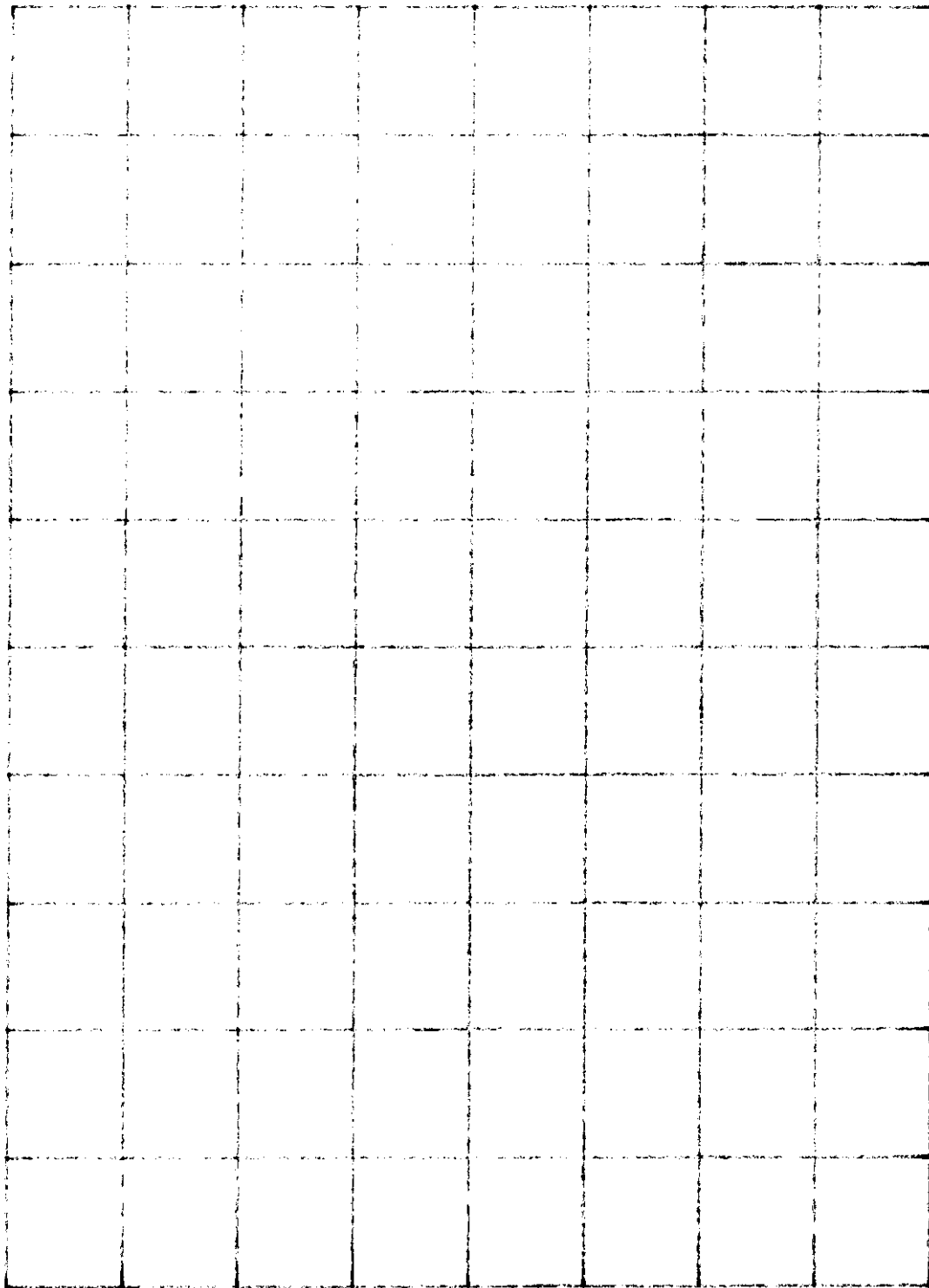
REF 107.0 dBμV AT 10 dB

PEAK

LOG

10

dB/



VA SB
SC FC
CORR

CENTER 49.86 MHz

#RES BW 30 KHz

#VBW 3 MHz

SPAN 20.00 MHz

SWP 66.7 msec

INTERTEK TESTING SERVICES

8.2 Discussion of Pulse Desensitization

The determination of pulse desensitivity was made in accordance with Hewlett Packard Application Note 150-2, *Spectrum Analysis ... Pulsed RF*.

This device is a superregenerative receiver. The stabilized signals are continuous, and no desensitization of the measurement equipment occurs.

INTERTEK TESTING SERVICES

8.3 Calculation of Average Factor

The emission limits are specified using spectrum analyzers or receivers which incorporate quasi-peak detectors. Typical measurements are made using peak detectors, however, emissions which approach the respective emission limit are measured using a quasi-peak detector.

For measurements above 1 GHz, spectrum analyzers or receivers using average detectors are employed, or the appropriate average factor can be applied.

Measurements using spectrum analyzers with filters other than peak detectors are recorded in the data table section of this report.

This device is a superregenerative receiver.

It is not necessary to apply average factor to the measurement results.

INTERTEK TESTING SERVICES

8.4 Emissions Test Procedures

The following is a description of the test procedure used by Intertek Testing Services Hong Kong Ltd. in the measurements of superregenerative receivers operating under the Part 15, Subpart B rules.

The test set-up and procedures described below are designed to meet the requirements of ANSI C63.4 - 1992. Superregenerative receivers are stabilized prior to measurement by generating a signal well above the receiver threshold whose frequency is tuned until the emissions stabilize into a line spectrum. The signal is usually generated as CW with a Marconi 2022D signal generator and a short whip antenna and is at a level of several hundred to several thousand mV/m. Plots of the stabilized signal will be shown. If a modulated signal is used, it will be noted.

The equipment under test (EUT) is attached to a cardboard box and placed on a wooden turntable which is four feet in diameter and approximately one meter in height above the groundplane. During the radiated emissions test, the turntable is rotated and any cables leaving the EUT are manipulated to find the configuration resulting in maximum emissions. The cardboard box is adjusted through all three orthogonal axis to obtain maximum emission levels. The antenna height and polarization are also varied during the testing to search for maximum signal levels. The height of the antenna is varied from one to four meters.

Detector function for radiated emissions is in peak mode. Average readings, when required, are taken by measuring the duty cycle of the equipment under test and subtracting the corresponding amount in dB from the measured peak readings. A detailed description for the calculation of the average factor can be found in Exhibit 8.3.

The frequency range scanned is from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or 40 GHz, whichever is lower. For line conducted emissions, the range scanned is 450 kHz to 30 MHz.

INTERTEK TESTING SERVICES

8.4 Emissions Test Procedures (cont)

The EUT is warmed up for 15 minutes prior to the test.

AC power to the unit is varied from 85% to 115% nominal and variation in the fundamental emission field strength is recorded. If battery powered, a new, fully charged battery is used.

Conducted measurements were made as described in ANSI C63.4 - 1992.

The IF bandwidth used for measurement of radiated signal strength was 100 kHz or greater below 1000 MHz. Where pulsed transmissions of short enough pulse duration warrant, a greater bandwidth is selected according to the recommendations of Hewlett Packard Application Note 150-2. A discussion of whether pulse desensitivity is applicable to this unit is included in this report (See Exhibit 8.2). Above 1000 MHz, a resolution bandwidth of 1 MHz is used.

Measurements are normally conducted at a measurement distance of three meters. All measurements are extrapolated to three meters using inverse scaling, unless otherwise reported. Measurements taken at a closer distance are so marked.