

Nemko-CCL, Inc.

1940 West Alexander Street

Salt Lake City, UT 84119

801-972-6146

Test Report

Certification

Test Of:
SUB10A-ZP

FCC ID:
MHISUB10A

Test Specification:

FCC PART 15, Subpart C

Test Report Serial No: 193697-3.1

Applicant:

Card Access Inc.
11778 South Election Road, Suite 260
Salt Lake City, UT 84020

Date of Test: December 12 & 13, 2011

Issue Date: December 21, 2011

Accredited Testing Laboratory By:



NVLAP Lab Code 100272-0

CERTIFICATION OF ENGINEERING REPORT

This report has been prepared by Nemko-CCL, Inc. to document compliance of the device described below with the requirements of Federal Communications Commission (FCC) Part 15, Subpart C. This report may be reproduced in full, partial reproduction may only be made with the written consent of the laboratory. The results in this report apply only to the sample tested.

- Applicant: Card Access Inc.
- Manufacturer: Card Access Inc.
- Brand Name: Card Access
- Model Number: SUB10A-ZP
- FCC ID Number: MHISUB10A

On this 21st day of December 2011, I, individually, and for Nemko-CCL, Inc., certify that the statements made in this engineering report are true, complete, and correct to the best of my knowledge, and are made in good faith.

Although NVLAP has recognized that the Nemko-CCL, Inc. EMC testing facilities are in good standing, this report must not be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

Nemko-CCL, Inc.



Tested by: Norman P. Hansen
EMC Technician

TABLE OF CONTENTS

	PAGE
<u>SECTION 1.0 CLIENT INFORMATION</u>	4
<u>SECTION 2.0 EQUIPMENT UNDER TEST (EUT)</u>	5
<u>SECTION 3.0 TEST SPECIFICATION, METHODS & PROCEDURES</u>	9
<u>SECTION 4.0 OPERATION OF EUT DURING TESTING</u>	15
<u>SECTION 5.0 SUMMARY OF TEST RESULTS</u>	16
<u>SECTION 6.0 MEASUREMENTS, EXAMINATIONS AND DERIVED RESULTS</u>	17
<u>APPENDIX 1 TEST PROCEDURES AND TEST EQUIPMENT</u>	36
<u>APPENDIX 2 PHOTOGRAPHS</u>	44
<u>APPENDIX 3 TRANSMITTER DUTY CYCLE CALCULATIONS</u>	55

SECTION 1.0 CLIENT INFORMATION

1.1 Applicant:

Company Name: Card Access Inc.
11778 South Election Road, Suite 260
Salt Lake City, UT 84020

Contact Name: James A. Stout
Title: Vice President Engineering

1.2 Manufacturer:

Company Name: Card Access Inc.
11778 South Election Road, Suite 260
Salt Lake City, UT 84020

Contact Name: James A. Stout
Title: Vice President Engineering

SECTION 2.0 EQUIPMENT UNDER TEST (EUT)

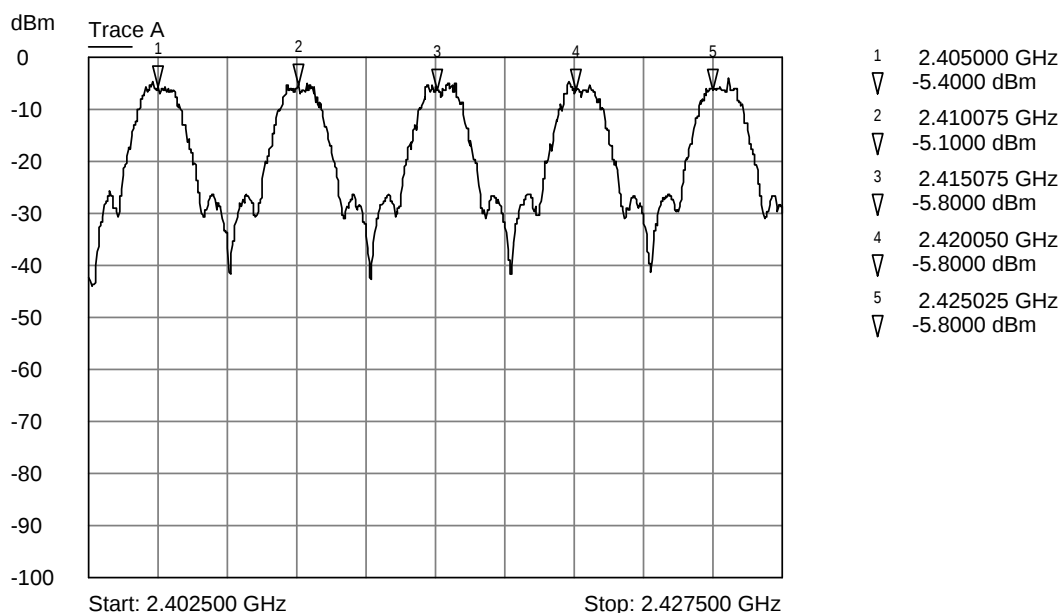
2.1 Identification of EUT:

Brand Name:	Card Access
Model Number:	SUB10A-ZP
Serial Number:	4107800279

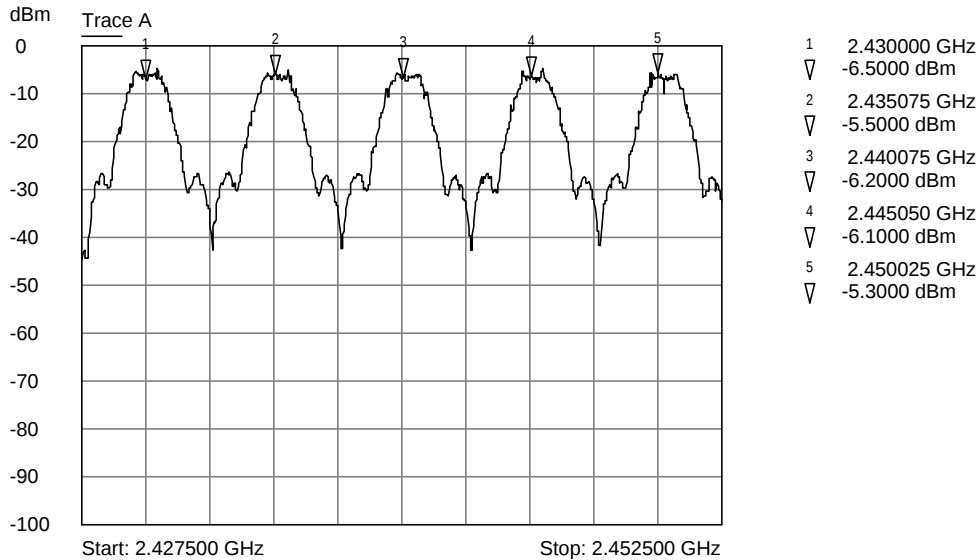
2.2 Description of EUT:

The SUB10A-ZP is a device that bridges between an RS-485 signal from an appliance such as a refrigerator or stove to Zigbee, to allow the appliance to be joined into a Zigbee network. Status and control signals will be passed between the appliance and the Zigbee controller. Power to the device comes through the same connector as the RS-485 signals. For testing, power to the SUB10A-ZP was supplied over the RS-485 port using a CUI 41-12-300, 12 VDC at 300 mA power supply or a V-infinity 3A-061WP12, 9 – 12 VDC at 660 mA, power supply.

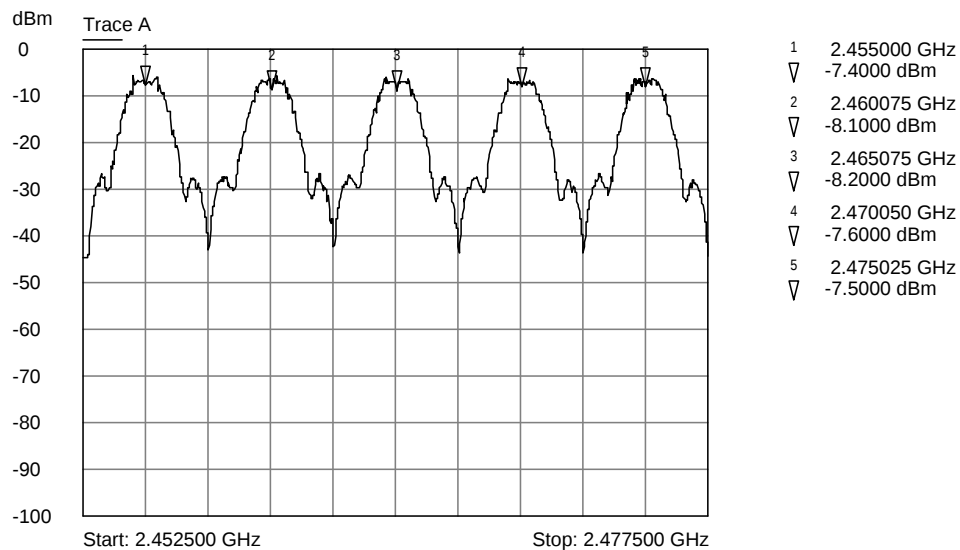
The SUB10A-ZP transceiver operates using 15 channels, spaced 5 MHz apart, in the 2400 MHz to 2483.5 MHz frequency band. The SUB10A-ZP transceiver uses a trace on the PCB for the antenna. Testing was performed with the EUT placed on 3 orthogonal axes and at the upper channel (2475 MHz), the middle channel (2440 MHz), and the lower channel (2405 MHz). See the plots of the channels below.



Trace A Lower 5 channels



Trace A Middle 5 channels



Trace A Upper 5 channels

This report covers the circuitry of the devices subject to FCC Part 15, Subpart C. The circuitry of the device subject to FCC Part 15, Subpart B has been tested and found to comply. See Nemko-CCL report #193697-2.1.

2.3 EUT and Support Equipment:

The EUT and support equipment used during the test are listed below:

Brand Name Model Number Serial Number	FCC ID Number or Compliance	Description	Name of Interface Ports / Interface Cables
BN: Card Access MN: SUB10A-ZP (Note 1) SN: 4107800279	MHISUB10A	RS-485 to Zigbee Adapter	See Section 2.4
BN: Lenovo MN: T510 SN: R9-AK6TH	DoC	Computer	USB/USB cable
BN: Parallax MN: USBto232 SN: None	None	USB to RS-232 Adapter	USB/USB cable RS-232/DB9 connector
BN: Serial Comm MN: CON-485-PIE SN: None	None	RS-232 to RS-485 Adapter	RS-232/DB9 connector RS485/DB9 connector with attached 6 conductor ribbon cable to Modular 6 pin connector with 6 conductor modular cable (Note 2)

Note: (1) EUT

(2) Interface port connected to EUT (See Section 2.4)

The support equipment listed above was not modified in order to achieve compliance with this standard.

2.4 Interface Ports on EUT:

Name of Port	No. of Ports Fitted to EUT	Cable Descriptions/Length
RS-485	1	6 conductor cable with modular connectors / 2 meters or 8 meters

2.5 Modification Incorporated/Special Accessories on EUT:

There were no modifications or special accessories required to comply with the specification.

SECTION 3.0 TEST SPECIFICATION, METHODS & PROCEDURES

3.1 Test Specification:

Title: FCC PART 15, Subpart C (47 CFR 15)
15.203, 15.207, and 15.247

Limits and methods of measurement of radio interference
characteristics of radio frequency devices

Purpose of Test: The tests were performed to demonstrate initial compliance

3.2 Methods & Procedures:

3.2.1 §15.203 Antenna Requirement

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with Section 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this Part are not exceeded.

3.2.2 §15.207 Conducted Limits

(a) Except for Class A digital devices, for equipment that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the band edges.

Frequency of Emission (MHz)	Conducted Limit (dBμV)	
	Quasi-peak	Average
0.15 – 0.5*	66 to 56*	56 to 46*
0.5 – 5	56	46
5 - 30	60	50

*Decreases with the logarithm of the frequency.

3.2.3 §15.247 Operation within the bands 902 – 928 MHz, 2400 – 2483.5 MHz, and 5725 – 5850 MHz

(a) Operation under the provisions of this Section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

(1) Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400 – 2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudorandomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

(i) For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 20 second period; if the 20 dB bandwidth of the hopping channel is 250 kHz or greater, the system shall use at least 25 hopping frequencies and the average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 10 second period. The maximum allowed 20 dB bandwidth of the hopping channel is 500 kHz.

(ii) Frequency hopping systems operating in the 5725-5850 MHz band shall use at least 75 hopping frequencies. The maximum 20 dB bandwidth of the hopping channel is 1 MHz. The average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 30 second period.

(iii) Frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 non-overlapping channels. The average time of occupancy on any

channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed. Frequency hopping systems may avoid or suppress transmissions on a particular hopping frequency provided that a minimum of 15 non-overlapping channels are used.

(2) Systems using digital modulation techniques may operate in the 902 - 928 MHz, 2400 - 2483.5 MHz, and 5725 - 5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

(b) The maximum peak output power of the intentional radiator shall not exceed the following:

(1) For frequency hopping systems operating in the 2400-2483.5 MHz band employing at least 75 non-overlapping hopping channels, and all frequency hopping systems in the 5725-5850 MHz band: 1 watt. For all other frequency hopping systems in the 2400-2483.5 MHz band: 0.125 watts.

(2) For frequency hopping systems operating in the 902-928 MHz band: 1 watt for systems employing at least 50 hopping channels; and, 0.25 watts for systems employing less than 50 hopping channels, but at least 25 hopping channels, as permitted under paragraph (a)(1)(i) of this section.

(3) For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725 – 5850 MHz bands: 1 watt. As an alternative to a peak power measurement, compliance with the Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

(4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

(c) Operation with directional antenna gains greater than 6 dBi.

(1) Fixed point-to-point operation:

(i) Systems operating in the 2400-2483.5 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

(ii) Systems operating in the 5725-5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

(iii) Fixed, point-to-point operation, as used in paragraphs (b)(4)(i) and (b)(4)(ii) of this section, excludes the use of point-to-multipoint systems, omnidirectional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum or digitally modulated intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

(2) In addition to the provisions in paragraphs (b)(1), (b)(3), (b)(4) and (c)(1)(i) of this section, transmitters operating in the 2400-2483.5 MHz band that emit multiple directional beams, simultaneously or sequentially, for the purpose of directing signals to individual receivers or to groups of receivers provided the emissions comply with the following:

(i) Different information must be transmitted to each receiver.

(ii) If the transmitter employs an antenna system that emits multiple directional beams but does not emit multiple directional beams simultaneously, the total output power conducted to the array or arrays that comprise the device, i.e., the sum of the power supplied to all antennas, antenna elements, staves, etc. and summed across all carriers or frequency channels, shall not exceed the limit specified in paragraph (b)(1) or (b)(3) of this section, as applicable. However, the total conducted output power shall be reduced by 1 dB below the specified limits for each 3 dB that the directional gain of the antenna /antenna array exceeds 6 dBi. The directional antenna gain shall be computed as follows:

(A) The directional gain shall be calculated as the sum of $10 \log$ (number of array elements or staves) plus the directional gain of the element or staff having the highest gain.

(B) A lower value for the directional gain than that calculated in paragraph (c)(2)(ii)(A) of this section will be accepted if sufficient

evidence is presented, e.g., due to shading of the array or coherence loss in the beamforming.

(iii) If a transmitter employs an antenna that operates simultaneously on multiple directional beams using the same or different frequency channels, the power supplied to each emission beam is subject to the power limit specified in paragraph (c)(2)(ii) of this section. If transmitted beams overlap, the power shall be reduced to ensure that their aggregate power does not exceed the limit specified in paragraph (c)(2)(ii) of this section. In addition, the aggregate power transmitted simultaneously on all beams shall not exceed the limit specified in paragraph (c)(2)(ii) of this section by more than 8 dB.

(iv) Transmitters that emit a single directional beam shall operate under the provisions of paragraph (c)(1) of this section.

(d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in Section 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in Section 15.205(a), must also comply with the radiated emission limits specified in Section 15.209(a) (see Section 15.205(c)).

(e) For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

(f) For the purposes of this section, hybrid systems are those that employ a combination of both frequency hopping and digital modulation techniques. The frequency hopping operation of the hybrid system, with the direct sequence or digital modulation operation turned off, shall have an average time of occupancy on any frequency not to exceed 0.4 seconds within a time period in seconds equal to the number of hopping frequencies employed multiplied by 0.4. The digital modulation operation of the hybrid system, with the frequency hopping turned off, shall comply with the power density requirements of paragraph (d) of this section.

(g) Frequency hopping spread spectrum systems are not required to employ all available hopping channels during each transmission. However, the system, consisting of both the

transmitter and the receiver, must be designed to comply with all of the regulations in this section should the transmitter be presented with a continuous data (or information) stream. In addition, a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.

(h) The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.

(i) Systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines. See § 1.1307(b)(1) of this Chapter.

Note: Spread spectrum systems are sharing these bands on a noninterference basis with systems supporting critical Government requirements that have been allocated the usage of these bands, secondary only to ISM equipment operated under the provisions of Part 18 of this Chapter. Many of these Government systems are airborne radiolocation systems that emit a high EIRP which can cause interference to other users. Also, investigations of the effect of spread spectrum interference to U. S. Government operations in the 902-928 MHz band may require a future decrease in the power limits allowed for spread spectrum operation.

3.3 Test Procedure

The conducted disturbance at mains ports and radiated disturbance testing was performed according to the procedures in ANSI C63.4: 2003. Testing was performed at Nemko-CCL, Inc. Wanship open area test site #2, located at 29145 Old Lincoln Highway, Wanship, UT. This site has been fully described in a report submitted to the FCC, and was accepted in a letter dated March 11, 2009 (90504).

Nemko-CCL, Inc. is accredited by National Voluntary Laboratory Accreditation Program (NVLAP); NVLAP Lab Code: 100272-0, which is effective until September 30, 2012.

For radiated emission testing at 30 MHz or above that is performed at distances closer than the specified distance, an inverse proportionality factor of 20 dB per decade is used to normalize the measured data for determining compliance.

SECTION 4.0 OPERATION OF EUT DURING TESTING

4.1 Operating Environment:

Power Supply: 120 VAC
AC Mains Frequency: 60 Hz

4.2 Operating Modes:

The transmitter was tested while in a constant transmit mode at the desired frequency, using either the upper, middle, or lower channel. The voltage to the transmitter module was varied as required by §15.31(e) with no change seen in the voltage supplied to the transmitter from the regulator or in transmitter characteristics.

4.3 EUT Exercise Software:

Card Access software was used to exercise the transmitter.

SECTION 5.0 SUMMARY OF TEST RESULTS**5.1 FCC Part 15, Subpart C****5.1.1 Summary of Tests:**

Section	Environmental Phenomena	Frequency Range (MHz)	Result
15.203	Antenna Requirements	Structural requirement	Complied
15.207	Conducted Disturbance at Mains Ports	0.15 to 30	Complied
15.247(a)	Bandwidth Requirement	2405 – 2475	Complied
15.247(b)	Peak Output Power	2405 – 2475	Complied
15.247(c)	Operation with Directional Gains Greater than 6 dBi	2400 – 2483.5	Not Applicable
15.247(d)	Spurious Emissions	30 - 24750	Complied
15.247(e)	Peak Power Spectral Density	2405 – 2475	Complied
15.247(f)	Hybrid System Requirements	2400 – 2483.5	Not Applicable
15.247(g)	Frequency Hopping Channel Usage	2400 – 2438.5	Not Applicable
15.247(h)	Frequency Hopping Intelligence	2400 – 2483.5	Not Applicable
15.247(i)	RF Energy Exposure	2400 – 2483.5	Complied

5.2 Result

In the configuration tested, the EUT complied with the requirements of the specification.

SECTION 6.0 MEASUREMENTS, EXAMINATIONS AND DERIVED RESULTS**6.1 General Comments:**

This section contains the test results only. Details of the test methods used and a list of the test equipment used during the measurements can be found in Appendix 1 of this report.

6.2 Test Results:**6.2.1 §15.203 Antenna Requirements**

The EUT uses a trace antenna on the PCB and is not user replaceable.

6.2.2 §15.207 Conducted Disturbance at the AC Mains Ports

Frequency (MHz)	AC Mains Lead	Detector	Measured Level (dBμV)	Limit (dBμV)	Margin (dB)
0.17	Hot Lead	Peak (Note 1)	44.7	55.0	-10.3
0.19	Hot Lead	Peak (Note 1)	42.4	54.1	-11.7
0.26	Hot Lead	Peak (Note 1)	39.8	51.5	-11.7
0.35	Hot Lead	Peak (Note 1)	38.6	48.9	-10.3
0.44	Hot Lead	Peak (Note 1)	36.3	47.1	-10.8
0.65	Hot Lead	Peak (Note 1)	35.5	46.0	-10.5
0.16	Neutral Lead	Peak (Note 1)	40.7	55.5	-14.8
0.18	Neutral Lead	Peak (Note 1)	39.0	54.3	-15.3
0.22	Neutral Lead	Peak (Note 1)	38.0	52.9	-14.9
0.29	Neutral Lead	Peak (Note 1)	36.4	50.5	-14.1
0.37	Neutral Lead	Peak (Note 1)	34.6	48.5	-13.9
0.62	Neutral Lead	Peak (Note 1)	32.4	46.0	-13.6
Note 1: The reference detector used for the measurements was Quasi-Peak or Peak and the data was compared to the average limit; therefore, the EUT was deemed to meet both the average and quasi-peak limits.					

RESULT

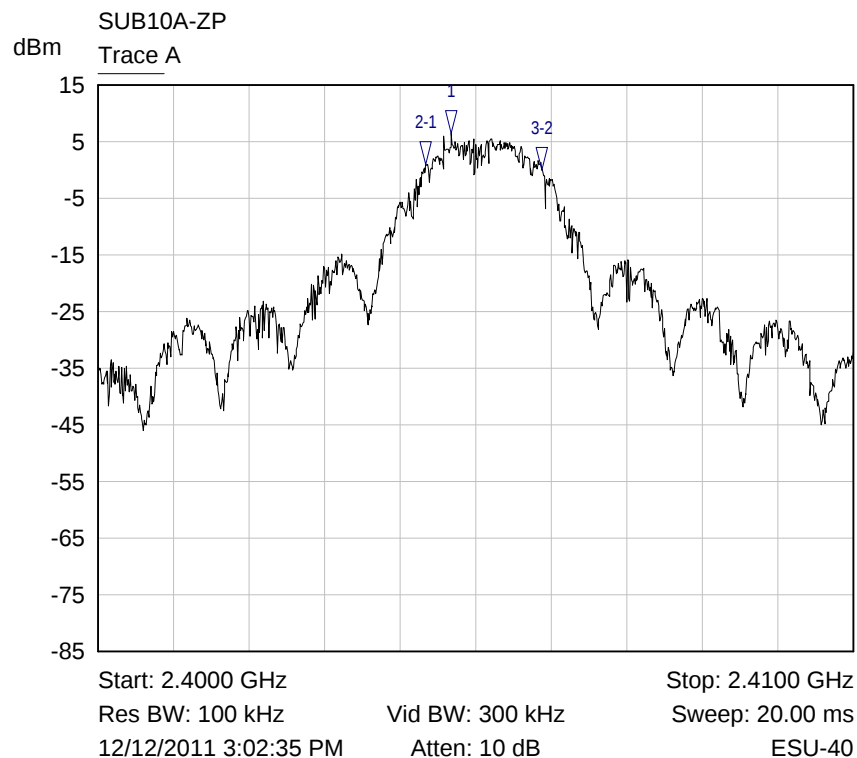
The EUT complied with the specification by 10.3 dB.

6.2.3 §15.247(a)(2) Emission Bandwidth

Frequency (MHz)	Emission 6 dB Bandwidth (kHz)
2405	1530.0
2440	1550.0
2475	1570.5

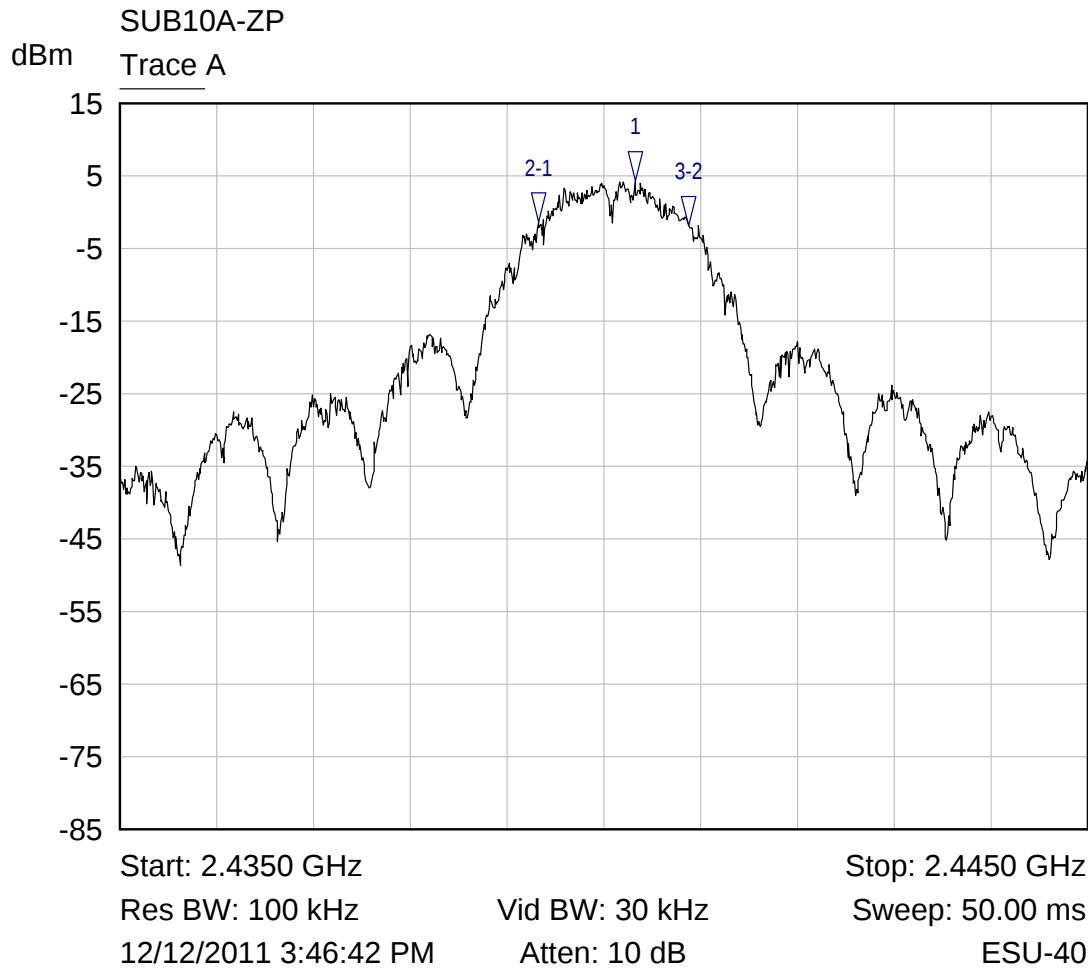
RESULT

In the configuration tested, the 6 dB bandwidth was greater than 500 kHz; therefore, the EUT complied with the requirements of the specification (see spectrum analyzer plots below).



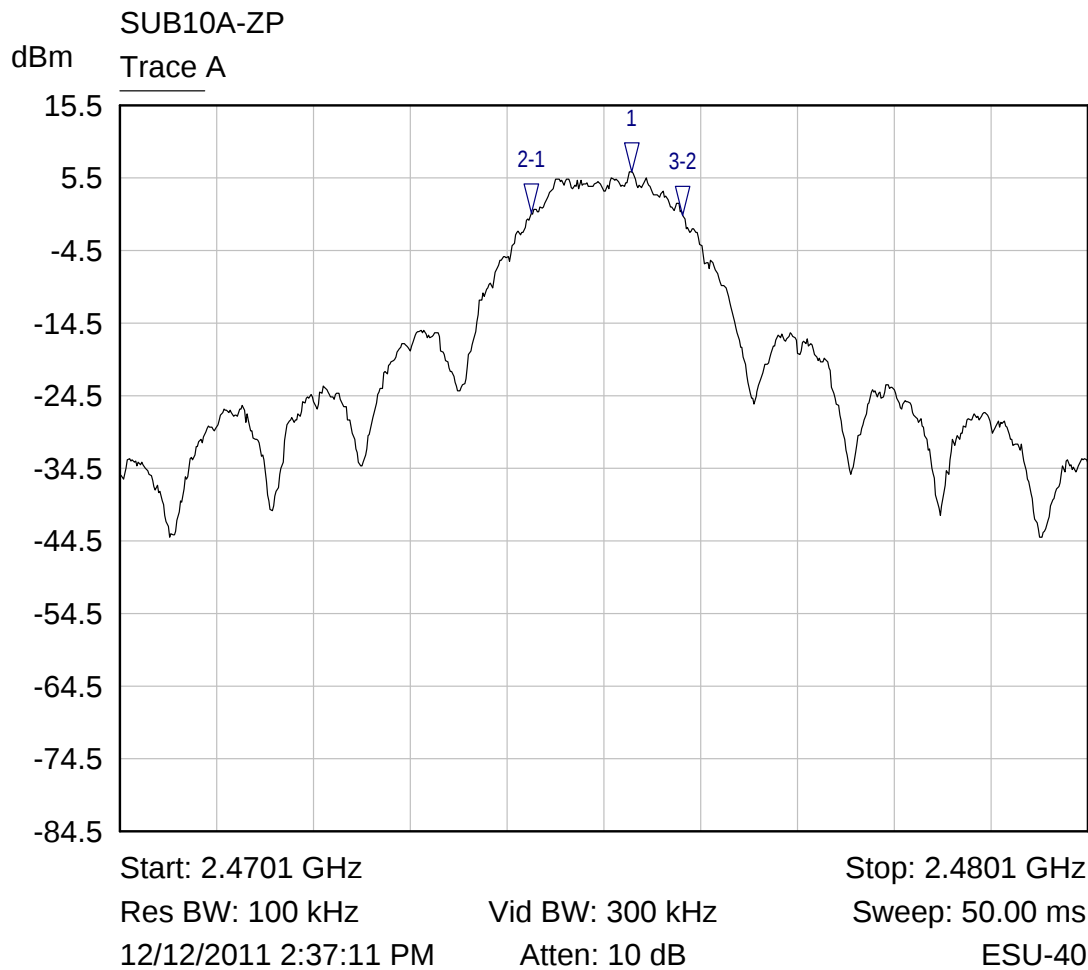
Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4047 GHz	6.44 dBm	
2-1 ▽	Trace A	-340.0000 kHz	-5.50 dB	
3-2 ▽	Trace A	1.5300 MHz	-0.88 dB	

Trace A Lower channel bandwidth plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4403 GHz	4.28 dBm	
2-1 ▽	Trace A	-1.0000 MHz	-5.56 dB	
3-2 ▽	Trace A	1.5500 MHz	-0.61 dB	

Trace A Middle channel band width plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4754 GHz	6.39 dBm	
2-1 ▽	Trace A	-1.0417 MHz	-5.78 dB	
3-2 ▽	Trace A	1.5705 MHz	-0.36 dB	

Trace A Upper channel bandwidth plot

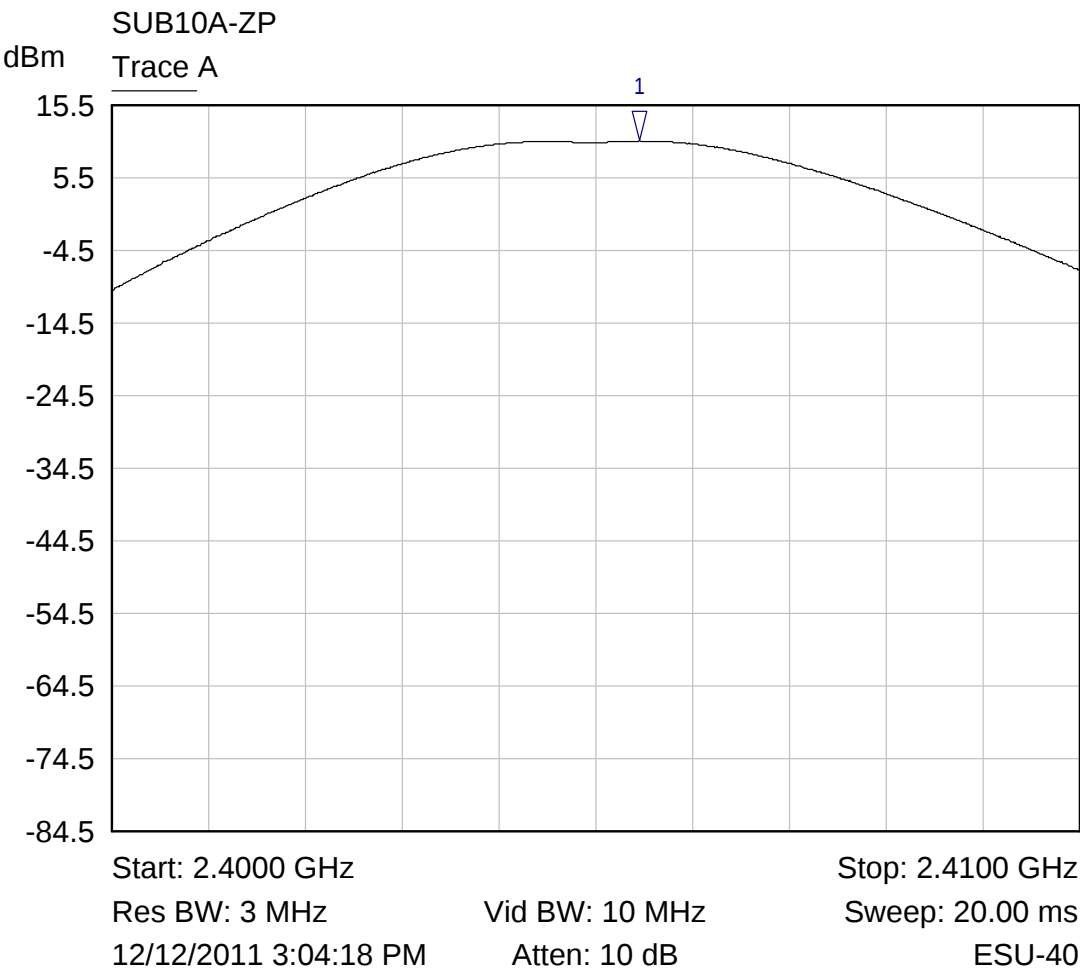
6.2.4 §15.247(b)(3) Peak Output Power

The maximum peak RF Conducted output power measured for this device was 11.46 mW or 10.59 dBm. The limit is 30 dBm or 1 Watt when using antennas with 6 dBi or less gain. The antenna has a gain of 0.7 dBi.

Frequency (MHz)	Measured Output Power (dBm)	Measured Output Power (mW)
2405	10.59	11.46
2440	9.46	8.83
2475	9.72	9.38

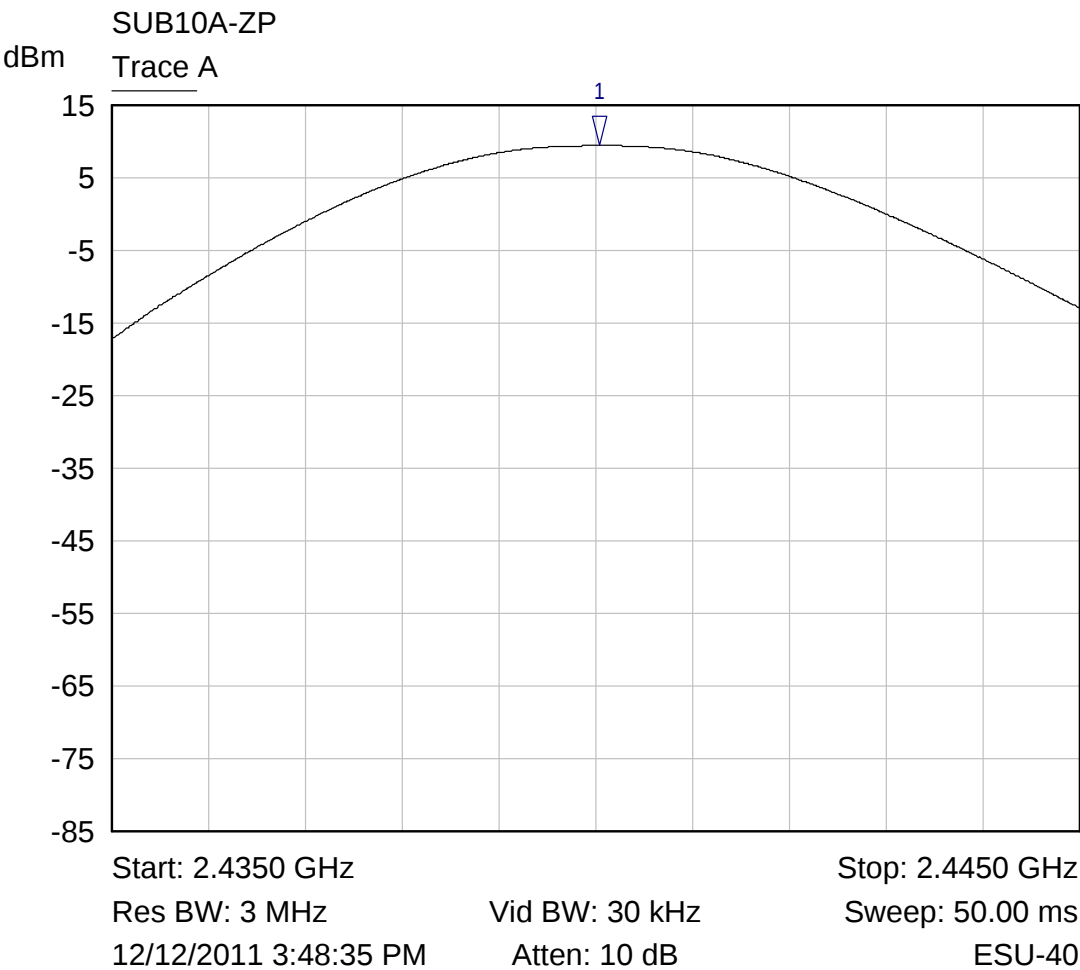
RESULT

In the configuration tested, the RF peak output power was less than 1 Watt; therefore, the EUT complied with the requirements of the specification (see spectrum analyzer plots below).



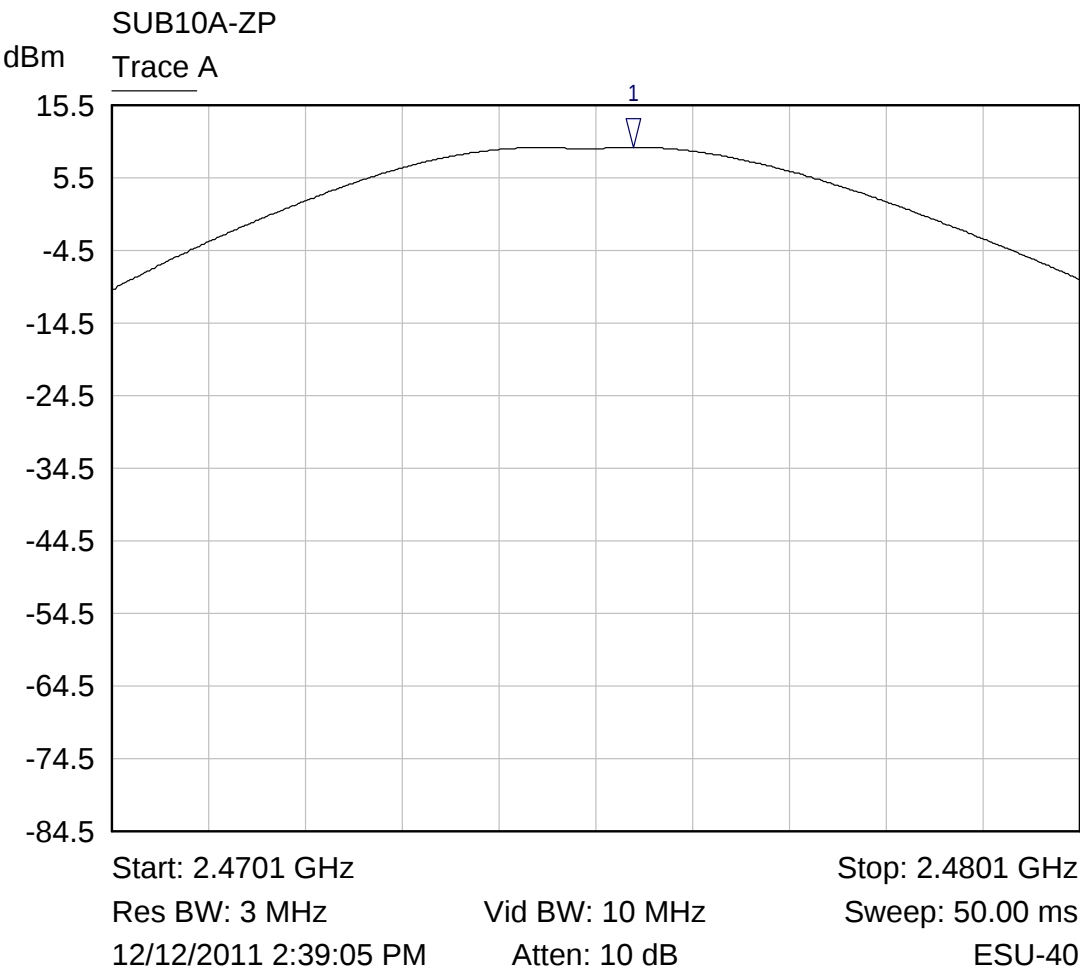
Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4055 GHz	10.59 dBm	

Trace A Lower channel output power plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4400 GHz	9.46 dBm	

Trace A Middle channel output power plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4755 GHz	9.72 dBm	

Trace A Upper channel output power plot

6.2.5 §15.247(d) Spurious Emissions**6.2.5.1 Conducted Spurious Emissions**

The frequency range from 30 MHz to the tenth harmonic of the highest fundamental frequency was investigated to measure any antenna-conducted emissions. The tables show the measurement data from spurious emissions noted across the frequency range when transmitting at the lowest frequency, middle frequency, and upper frequency. Shown after the tables, are band edge plots with the EUT tuned to the upper and lower channels. These demonstrate compliance with the provisions of this section at the band edges.

The emissions must be attenuated 20 dB below the highest power level measured within the authorized band as measured with a 100 kHz RBW; the highest level measured was 6.4 dBm; therefore, the criteria is $6.4 - 20.0 = -13.6$ dBm.

RESULT

Conducted spurious emissions were attenuated 20 dB or more from the fundamental; therefore, the EUT complies with the specification.

Transmitting on the Lowest Channel (2.405 GHz)

Frequency (MHz)	Corrected Level (dBm)	Criteria (dBm)
4810.0	-62.9	-13.6
7215.0	-63.1	-13.6
9620.0	-62.8	-13.6
12025.0	-63.7	-13.6
14430.0	-62.4	-13.6
16835.0	-63.0	-13.6
19240.0	-63.0	-13.6
21645.0	-63.5	-13.6
24050.0	-63.7	-13.6

Transmitting on the Middle Channel (2.440 GHz)

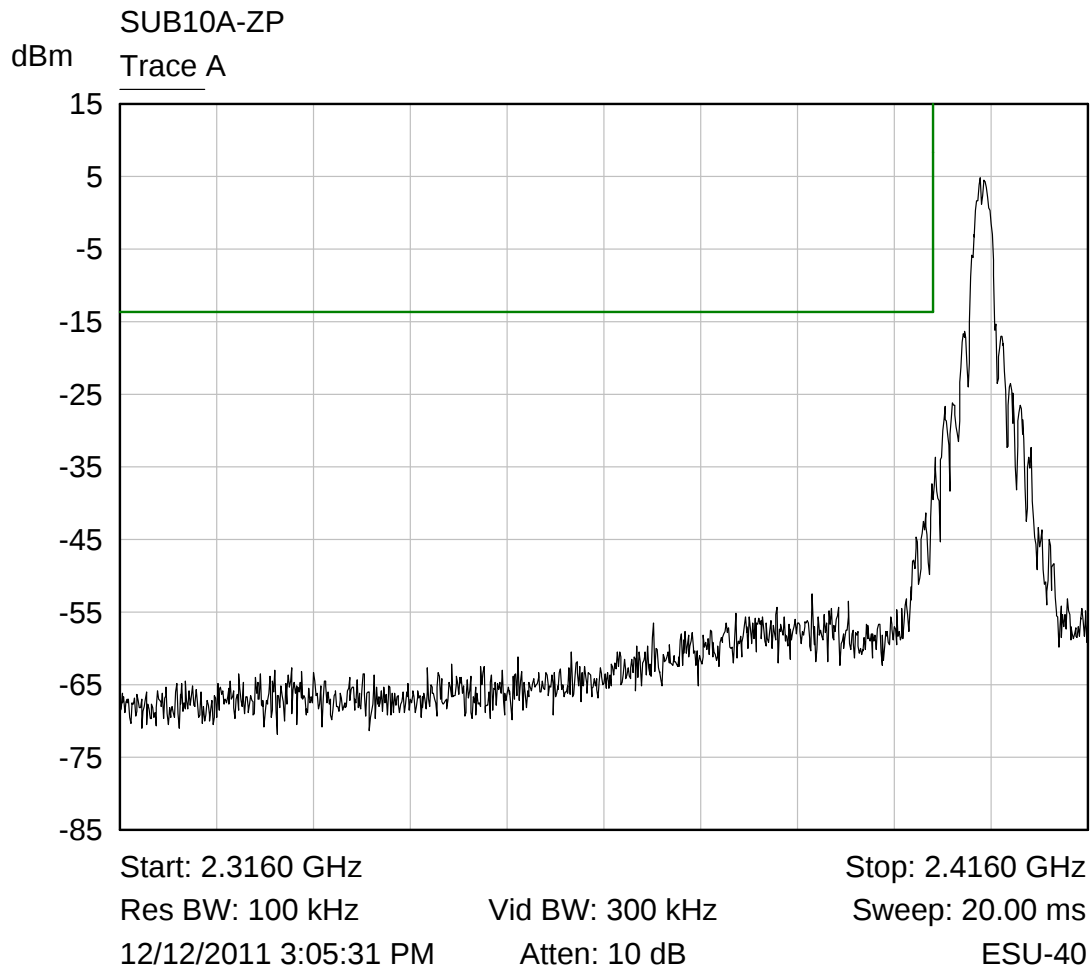
Frequency (MHz)	Corrected Level (dBm)	Criteria (dBm)
4880.0	-57.1	-13.6
7320.0	-65.0	-13.6

Frequency (MHz)	Corrected Level (dBm)	Criteria (dBm)
9760.0	-65.5	-13.6
12200.0	-64.5	-13.6
14640.0	-65.1	-13.6
17080.0	-64.9	-13.6
19520.0	-65.4	-13.6
21960.0	-64.3	-13.6
24400.0	-64.8	-13.6

Transmitting on the Highest Channel (2.475 GHz)

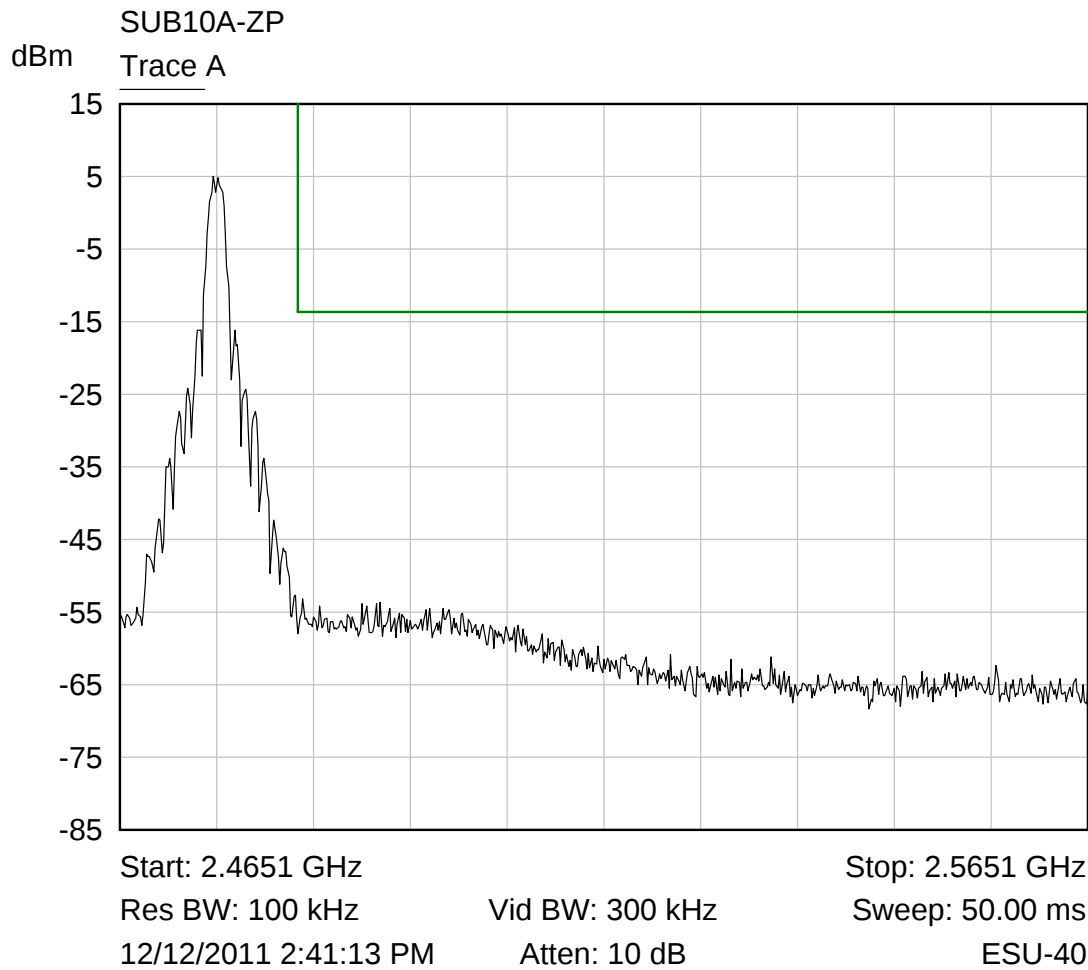
Frequency (MHz)	Corrected Level (dBm)	Criteria (dBm)
4950.0	-56.4	-13.6
7425.0	-63.2	-13.6
9900.0	-63.8	-13.6
12375.0	-63.1	-13.6
14850.0	-62.8	-13.6
17325.0	-63.5	-13.6
19800.0	-62.8	-13.6
22275.0	-63.1	-13.6
24750.0	-63.2	-13.6

Lower Band Edge Plot



Trace A Lower channel band edge plot

Upper Band Edge



Trace A Upper channel band edge plot

6.2.5.2 Radiated Emissions

The frequency range from 30 MHz to 25 GHz was investigated to measure any radiated emissions in the restricted bands. The following tables show measurements of any emission that fell into the restricted bands of §15.205. The tables show the worst-case emission measured from the ZGB20. For frequencies above 12.5 GHz, a measurement distance of 1 meter was used.

The noise floor was a minimum of 6 dB below the limit. The emissions in the restricted bands must meet the limits specified in §15.209. Tabular data for each of the spurious emissions is shown below for each of the units. Plots of the band edges are also shown.

Average Factor

The EUT operates at a maximum duty cycle of 42.06% when using the EmberZNet protocol. A correction factor of -7.5 dB will be applied to the average detection measurements. For details of the duty cycle calculation, see Appendix 4.

RESULT

All emissions in the restricted bands of §15.205 met the limits specified in §15.209; therefore, the EUT complies with the specification.

Transmitting at the Lowest Frequency (2405 MHz)

Frequency (MHz)	Detection Mode	Antenna Polarity	Receiver Reading (dBμV)	Correction Factor (dB)	Averaging Factor (dB)	Field Strength (dBμV/m)	Limit (dBμV/m)	Margin (dB)
4810.0	Peak	Vertical	24.6	37.7	0.0	62.3	74.0	-11.7
4810.0	Average	Vertical	17.2	37.7	-7.5	47.4	54.0	-6.6
4810.0	Peak	Horizontal	15.0	37.7	0.0	52.7	74.0	-21.3
4810.0	Average	Horizontal	7.7	37.7	-7.5	37.9	54.0	-16.1
7215.0	Peak	Vertical	17.8	42.1	0.0	59.9	74.0	-14.1
7215.0	Average	Vertical	8.8	42.1	-7.5	43.4	54.0	-10.6
7215.0	Peak	Horizontal	18.2	42.1	0.0	60.3	74.0	-13.7
7215.0	Average	Horizontal	9.2	42.1	-7.5	43.8	54.0	-10.2
12025.0	Peak	Vertical	7.9	47.2	0.0	55.1	74.0	-18.9
12025.0	Average	Vertical	-1.9	47.2	-7.5	37.8	54.0	-16.2
12025.0	Peak	Horizontal	3.0	47.2	0.0	50.2	74.0	-23.8
12025.0	Average	Horizontal	-8.9	47.2	-7.5	30.8	54.0	-23.2

Transmitting at the Middle Frequency (2440 MHz)

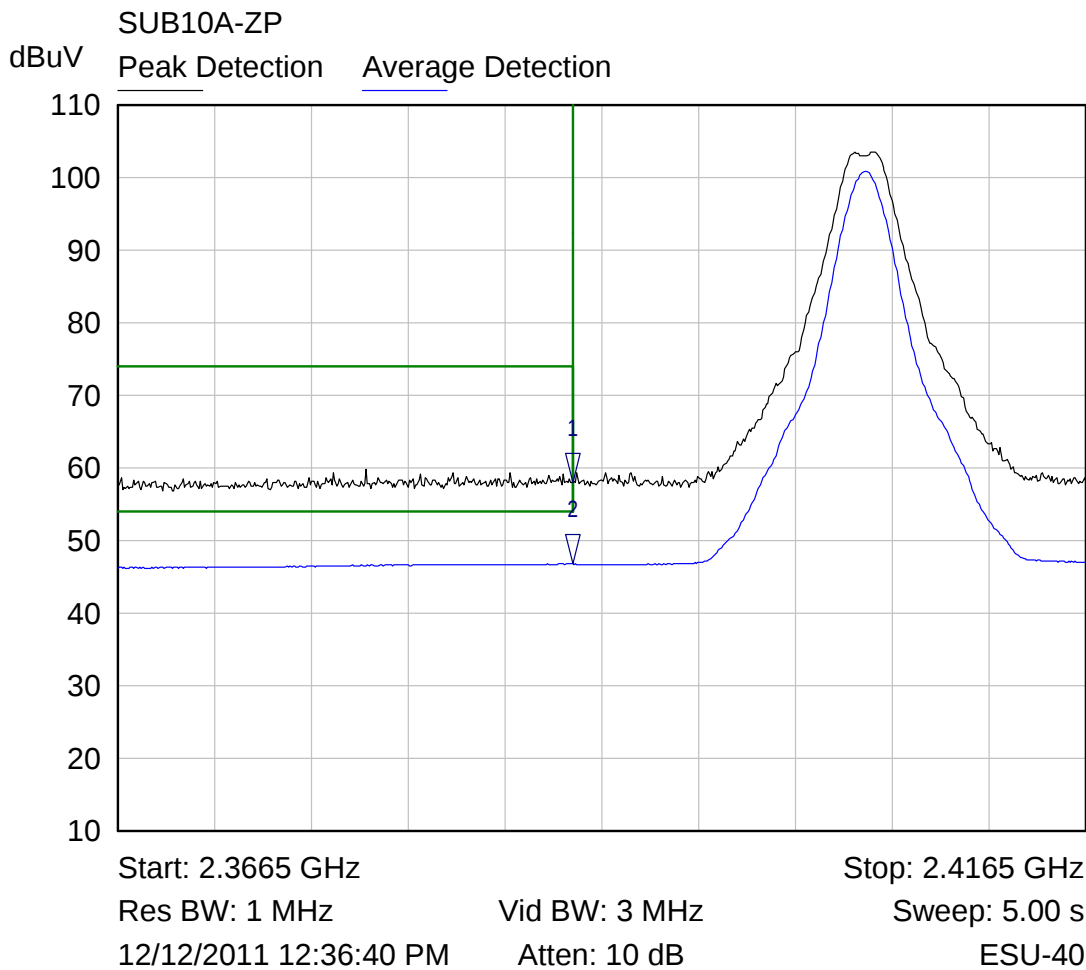
Frequency (MHz)	Detection Mode	Antenna Polarity	Receiver Reading (dBμV)	Correction Factor (dB)	Averaging Factor (dB)	Field Strength (dBμV/m)	Limit (dBμV/m)	Margin (dB)
4880.0	Peak	Vertical	24.0	37.9	0.0	61.9	74.0	-12.1
4880.0	Average	Vertical	17.5	37.9	-7.5	47.9	54.0	-6.1
4880.0	Peak	Horizontal	14.6	37.9	0.0	52.5	74.0	-21.5
4880.0	Average	Horizontal	7.5	37.9	-7.5	37.9	54.0	-16.1
7320.0	Peak	Vertical	10.9	42.3	0.0	53.2	74.0	-20.8
7320.0	Average	Vertical	1.2	42.3	-7.5	36.0	54.0	-18.0
7320.0	Peak	Horizontal	16.1	42.3	0.0	58.4	74.0	-15.6
7320.0	Average	Horizontal	7.4	42.3	-7.5	42.2	54.0	-11.8
12200.0	Peak	Vertical	4.6	47.1	0.0	51.7	74.0	-22.3
12200.0	Average	Vertical	-6.2	47.1	-7.5	33.4	54.0	-20.6
12200.0	Peak	Horizontal	1.7	47.1	0.0	48.8	74.0	-25.2
12200.0	Average	Horizontal	-9.7	47.1	-7.5	29.9	54.0	-24.1

Transmitting at the Highest Frequency (2475 MHz)

Frequency (MHz)	Detection Mode	Antenna Polarity	Receiver Reading (dBμV)	Correction Factor (dB)	Averaging Factor (dB)	Field Strength (dBμV/m)	Limit (dBμV/m)	Margin (dB)
4950.0	Peak	Vertical	20.9	38.0	0.0	58.9	74.0	-15.1
4950.0	Average	Vertical	13.6	38.0	-7.5	44.1	54.0	-9.9
4950.0	Peak	Horizontal	13.2	38.0	0.0	51.2	74.0	-22.8
4950.0	Average	Horizontal	5.2	38.0	-7.5	35.7	54.0	-18.3
7425.0	Peak	Vertical	10.9	42.6	0.0	53.5	74.0	-20.5
7425.0	Average	Vertical	1.7	42.6	-7.5	36.8	54.0	-17.2
7425.0	Peak	Horizontal	13.1	42.6	0.0	55.7	74.0	-18.3
7425.0	Average	Horizontal	2.9	42.6	-7.5	38.0	54.0	-16.0
12375.0	Peak	Vertical	1.8	47.0	0.0	48.8	74.0	-25.2
12375.0	Average	Vertical	-9.8	47.0	-7.5	29.7	54.0	-24.3
12375.0	Peak	Horizontal	1.4	47.0	0.0	48.4	74.0	-25.6
12375.0	Average	Horizontal	-11.2	47.0	-7.5	28.3	54.0	-25.7

No other emissions were seen above the noise floor. Noise floor was greater than 6 dB below the limit. At frequencies above 12.5 GHz, a 1 meter measurement distance was used.

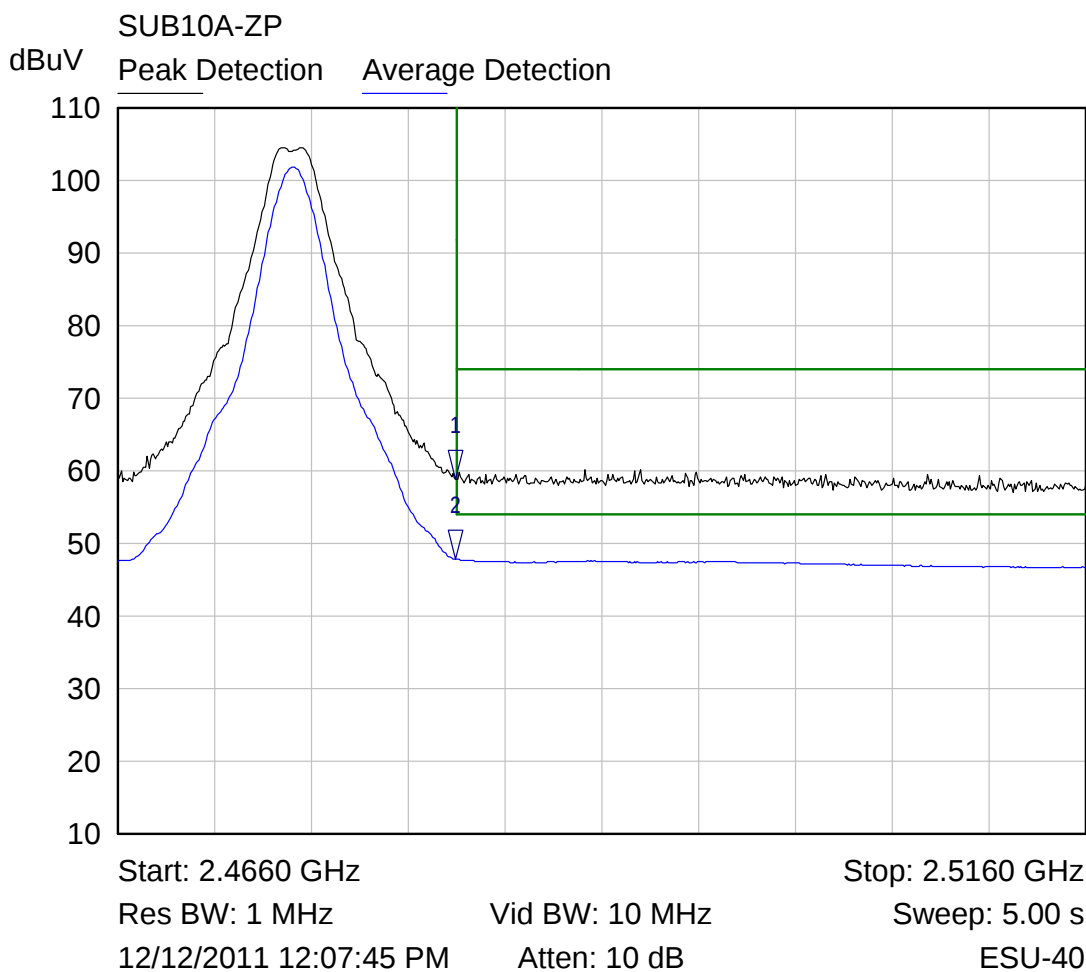
Lower Band Edge Plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Peak Detection	2.3900 GHz	58.03 dBuV	
2 ▽	Average Detection	2.3900 GHz	46.82 dBuV	

Traces are corrected for antenna and cable

Upper Band Edge Plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Peak Detection	2.4835 GHz	58.90 dBuV	
2 ▽	Average Detection	2.4835 GHz	47.81 dBuV	

Traces are corrected for antenna and cable

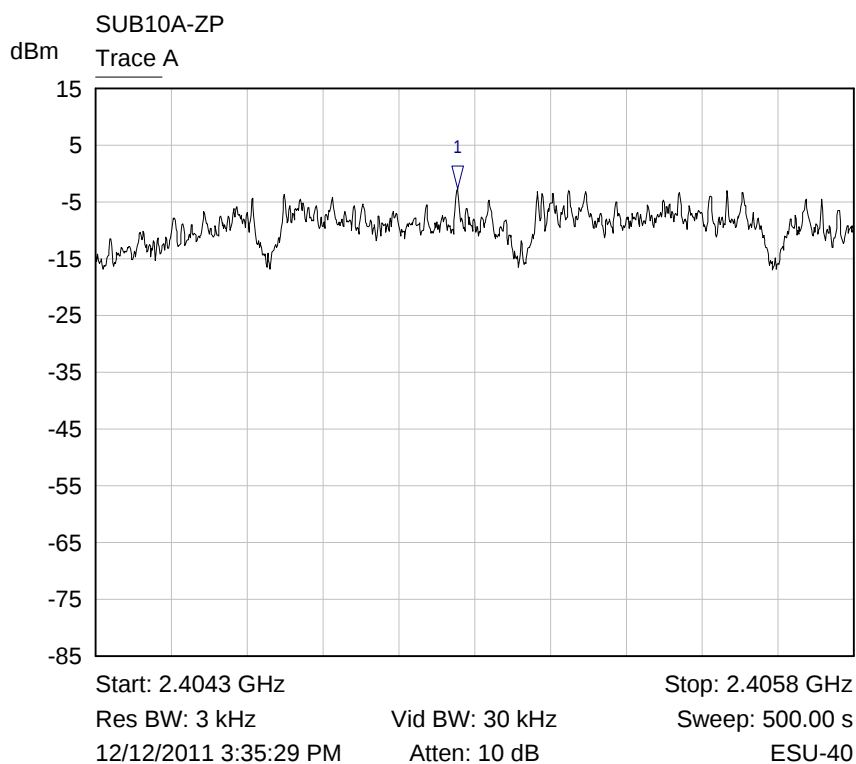
6.2.6 §15.247(e) Peak Power Spectral Density

The peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. The plots are shown below and the results of this testing are summarized in the table below.

Frequency (MHz)	Measurement (dBm)	Criteria (dBm)	Margin (dBm)
2405	-2.65	8.0	-10.65
2440	-3.39	8.0	-11.39
2475	-3.91	8.0	-11.91

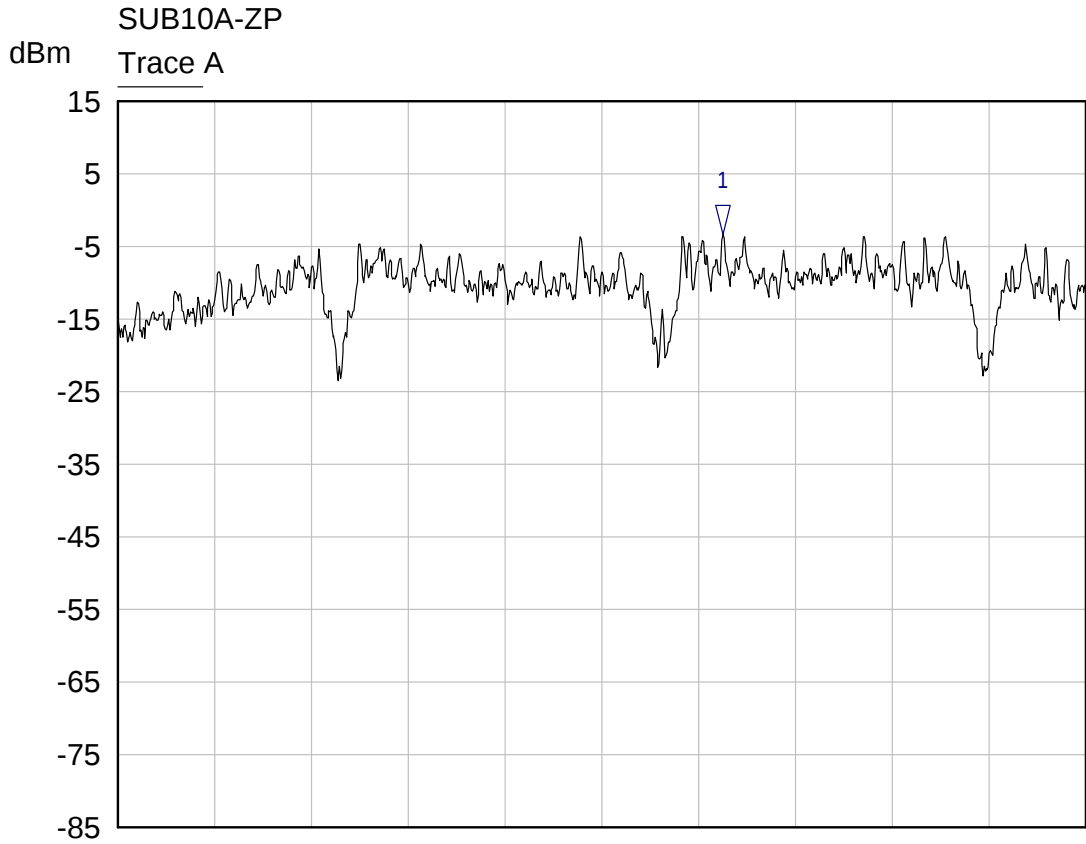
RESULT

The maximum peak power spectral density was -2.65 dBm. The limit is 8 dBm. The EUT complies with the specification by 10.65 dB.



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4050 GHz	-2.65 dBm	

Trace A Lower channel 3 kHz PSD plot



Start: 2.4393 GHz

Stop: 2.4408 GHz

Res BW: 3 kHz

Vid BW: 30 kHz

Sweep: 500.00 s

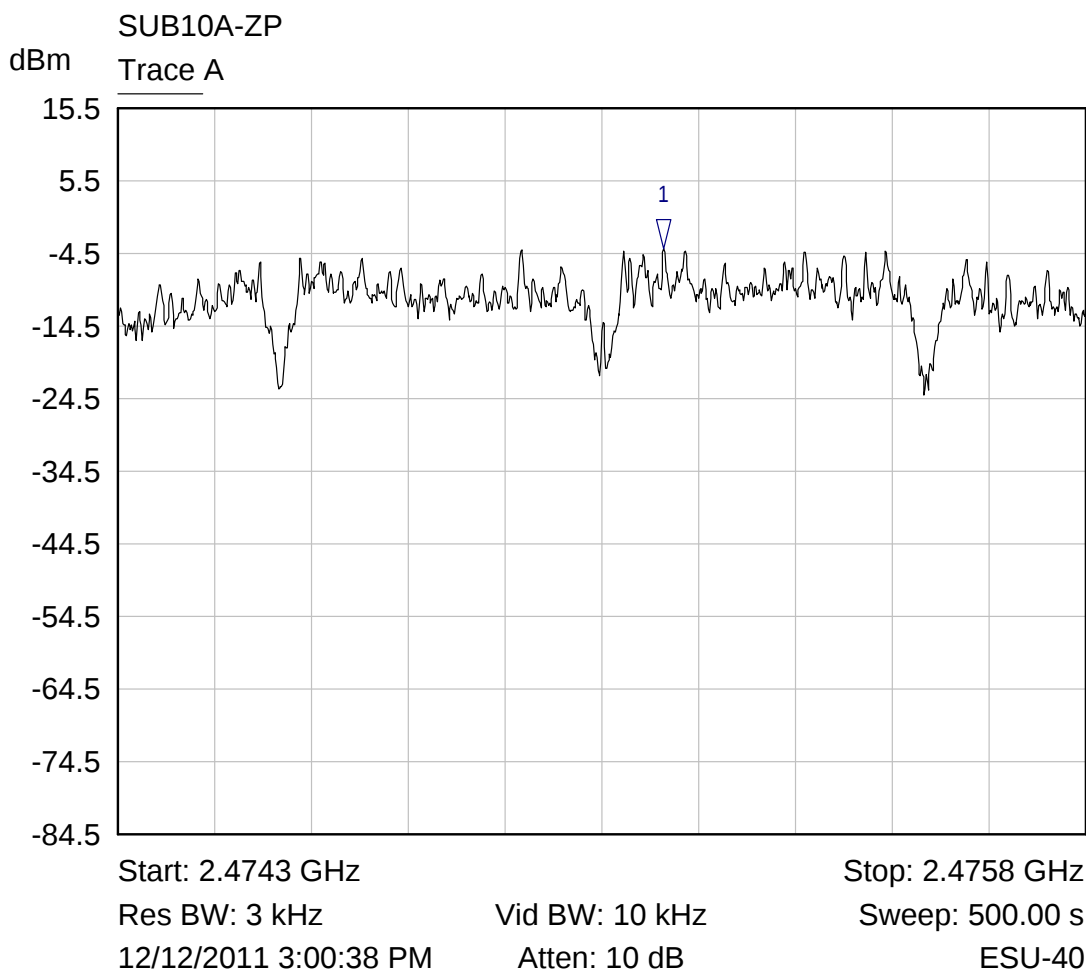
12/12/2011 3:45:39 PM

Atten: 10 dB

ESU-40

Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4402 GHz	-3.39 dBm	

Trace A Middle channel 3 kHz PSD plot



Mkr	Trace	X-Axis	Value	Notes
1 ▽	Trace A	2.4752 GHz	-3.91 dBm	

Trace A Upper channel 3 kHz PSD plot

6.2.7 §15.247(i) Exposure to RF Energy

See Exhibit 11 in documents filed with the FCC for certification.

APPENDIX 1 TEST PROCEDURES AND TEST EQUIPMENT**A1.1 §15.207 Conducted Disturbance at the AC Mains**

The conducted disturbance at mains ports from the EUT was measured using a spectrum analyzer with a quasi-peak adapter for peak, quasi-peak and average readings. The quasi-peak adapter uses a bandwidth of 9 kHz, with the spectrum analyzer's resolution bandwidth set at 100 kHz, for readings in the 150 kHz to 30 MHz frequency ranges.

The conducted disturbance at mains ports measurements are performed in a screen room using a (50 Ω /50 μ H) Line Impedance Stabilization Network (LISN).

Where mains flexible power cords are longer than 1 m, the excess cable is folded back and forth as far as possible so as to form a bundle not exceeding 0.4 m in length.

Where the EUT is a collection of devices with each device having its own power cord, the point of connection for the LISN is determined from the following rules:

- (a) Each power cord, which is terminated in a mains supply plug, shall be tested separately.
- (b) Power cords, which are not specified by the manufacturer to be connected via a host unit, shall be tested separately.
- (c) Power cords which are specified by the manufacturer to be connected via a host unit or other power supplying equipment shall be connected to that host unit and the power cords of that host unit connected to the LISN and tested.
- (d) Where a special connection is specified, the necessary hardware to effect the connection is supplied by the manufacturer for the testing purpose.
- (e) When testing equipment with multiple mains cords, those cords not under test are connected to an artificial mains network (AMN) different than the AMN used for the mains cord under test.

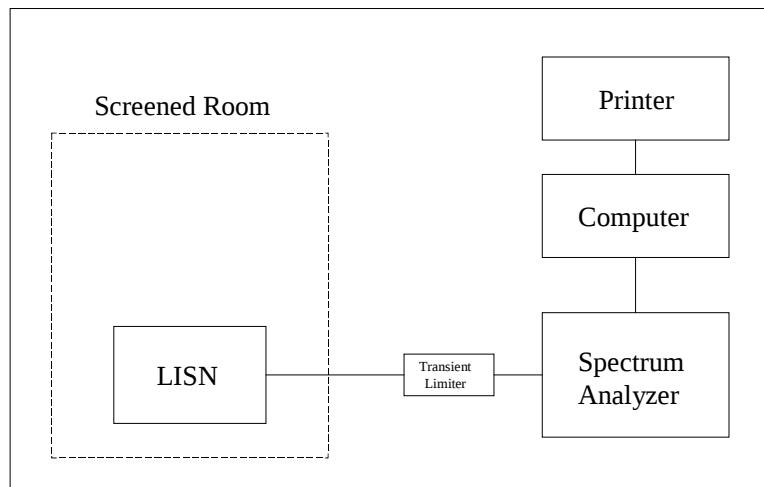
For AC mains port testing, desktop EUT are placed on a non-conducting table at least 0.8 meters from the metallic floor and placed 40 cm from the vertical coupling plane (copper plating in the wall behind EUT table). Floor standing equipment is placed directly on the earth grounded floor.

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
Wanship Open Area Test Site #2	Nemko-CCL, Inc.	N/A	N/A	11/16/2011
Test Software	Nemko-CCL, Inc.	Conducted Emissions	Revision 1.2	N/A
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711	01/05/2011

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137	01/05/2011
LISN	EMCO	3825/2	9305-2099	03/07/2011
Conductance Cable Wanship Site #2	Nemko-CCL, Inc.	Cable J	N/A	12/21/2010
Transient Limiter	Hewlett Packard	11947A	3107A02266	12/21/2010

An independent calibration laboratory or Nemko-CCL Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Conducted Emissions Test Setup



A1.2 §15.247(a)(2) Emission Bandwidth

The EUT was directly connected to the spectrum analyzer via the antenna output port as shown in the block diagram below.

The measurements were performed on three channels, as per 47 CFR 15.31(m), one near the bottom of the spectrum, one near the middle of the spectrum and one near the top of the spectrum.

The spectrum analyzer's resolution bandwidth and video bandwidth were set as follows:

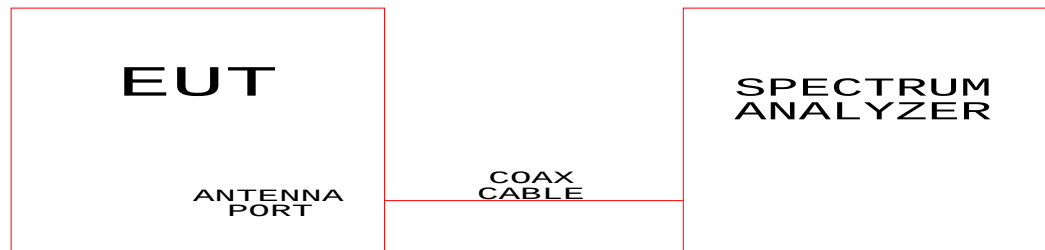
RBW = 100 kHz

VBW = 300 kHz

Type of Equipment	Manufacturer	Model Number	Serial Number
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137
Spectrum Analyzer/Receiver	Rohde & Schwarz	1302.6005.40	100064
Low Loss Cable (1 dB)	N/A	N/A	N/A

An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Test Configuration Block Diagram



A1.3 §15.247(b)(3) Peak Output Power

The EUT was directly connected to the spectrum analyzer via the antenna output port as shown in the block diagram below.

The measurements were performed on three channels, as per 47 CFR 15.31(m), one near the bottom of the spectrum, one near the middle of the spectrum and one near the top of the spectrum.

The spectrum analyzer's resolution bandwidth and video bandwidth were set as follows:

RBW = 3 MHz

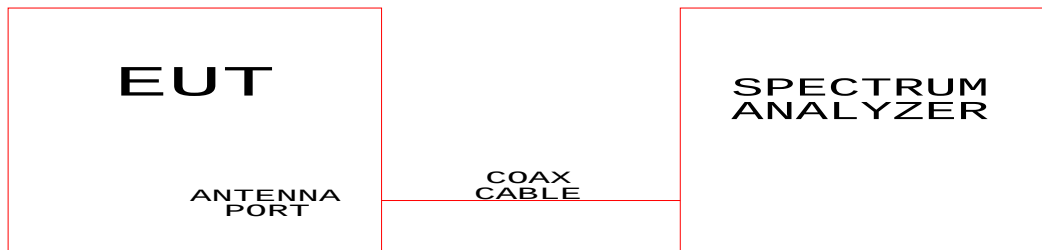
VBW = 10 MHz

Type of Equipment	Manufacturer	Model Number	Serial Number
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137

Type of Equipment	Manufacturer	Model Number	Serial Number
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137
Spectrum Analyzer/Receiver	Rohde & Schwarz	1302.6005.40	100064
Low Loss Cable (1 dB)	N/A	N/A	N/A

An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Test Configuration Block Diagram



A1.4 §15.247(c) Conducted Spurious Emissions

The EUT was directly connected to the spectrum analyzer via the antenna output port as shown in the block diagram below.

The measurements were performed on three channels, as per 47 CFR 15.31(m), one near the bottom of the spectrum, one near the middle of the spectrum and one near the top of the spectrum.

The spectrum analyzer's resolution bandwidth and video bandwidth were set as follows:

RBW = 100 kHz

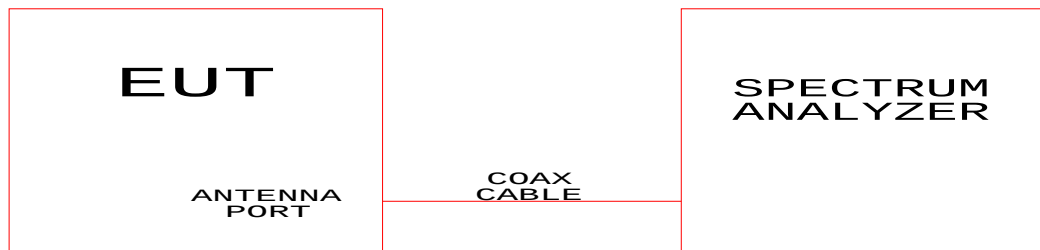
VBW = 300 kHz

Type of Equipment	Manufacturer	Model Number	Serial Number
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711

Type of Equipment	Manufacturer	Model Number	Serial Number
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137
Spectrum Analyzer/Receiver	Rohde & Schwarz	1302.6005.40	100064
Low Loss Cable (1 dB)	N/A	N/A	N/A

An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Test Configuration Block Diagram



A1.5 §15.247 Radiated Spurious Emissions in the Restricted Bands

The radiated disturbance from the EUT was measured using a spectrum analyzer with a quasi-peak adapter for peak and quasi-peak readings. A preamplifier with a fixed gain of 26 dB and a power amplifier with a fixed gain of 22 dB were used to increase the sensitivity of the measuring instrumentation. The quasi-peak adapter uses a bandwidth of 120 kHz, with the spectrum analyzer's resolution bandwidth set at 1 MHz, for readings in the 30 to 1000 MHz frequency ranges.

A biconilog antenna was used to measure the frequency range of 30 to 1000 MHz, at a distance of 3 meters from the EUT. The readings obtained by these antennas are correlated to the levels obtained with a tuned dipole antenna by adding antenna factors. A double-ridged guide antenna was used to measure the emissions at frequencies above 1000 MHz at a distance of 3 meters from the EUT.

The configuration of the EUT was varied to find the maximum radiated emission. The EUT was connected to the peripherals listed in Section 2.3 via the interconnecting cables listed in Section 2.4. A technician manually manipulated these interconnecting cables to obtain worst-case radiated disturbance. The EUT was rotated 360 degrees, and the antenna height was varied from 1 to 4 meters to find the maximum radiated emission. Where there were multiple interface ports all of the same type, cables are either placed on all of the ports or cables added to these ports until the emissions do not increase by more than 2 dB.

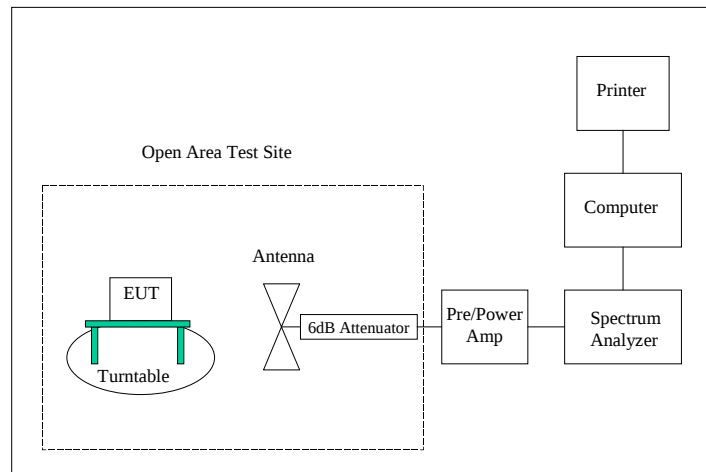
Desktop EUT are measured on a non-conducting table 0.8 meters above the ground plane. The table is placed on a turntable, which is level with the ground plane. For equipment normally placed on floors, the equipment shall be placed directly on the turntable.

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
Wanship Open Area Test Site #2	Nemko-CCL, Inc.	N/A	N/A	11/16/2011
Test Software	Nemko-CCL, Inc.	Radiated Emissions	Revision 1.3	N/A
Spectrum Analyzer/Receiver	Rhode & Schwarz	1302.6005.40	100064	07/28/2011
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711	01/05/2011
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137	01/05/2011
Biconilog Antenna	EMCO	3142	9601-1008	10/15/2010
Double Ridged Guide Antenna	EMCO	3115	9604-4779	03/10/2011

Type of Equipment	Manufacturer	Model Number	Serial Number	Date of Last Calibration
High Frequency Amplifier	Miteq	AFS4-01001800-43-10P-4	1096455	06/22/2011
6' High Frequency Cable	Microcoax	UFB197C-0-0720-000000	1296	05/10/2011
20' High Frequency Cable	Microcoax	UFB197C-1-3120-000000	1297	05/10//2011
3 Meter Radiated Emissions Cable Wanship Site #2	Microcoax	UFB205A-0-4700-000000	1295	05/10/2011
Pre/Power-Amplifier	Hewlett Packard	8447F	3113A05161	08/25/2011
6 dB Attenuator	Hewlett Packard	8491A	32835	12/21/2010

An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Radiated Emissions Test Setup



A1.6 §15.247(d) Peak Power Spectral Density

The EUT was directly connected to the spectrum analyzer via the antenna output port as shown in the block diagram below.

The measurements were performed on three channels, as per 47 CFR 15.31(m), one near

the bottom of the spectrum, one near the middle of the spectrum and one near the top of the spectrum.

The spectrum analyzer's resolution bandwidth and video bandwidth were set as follows:

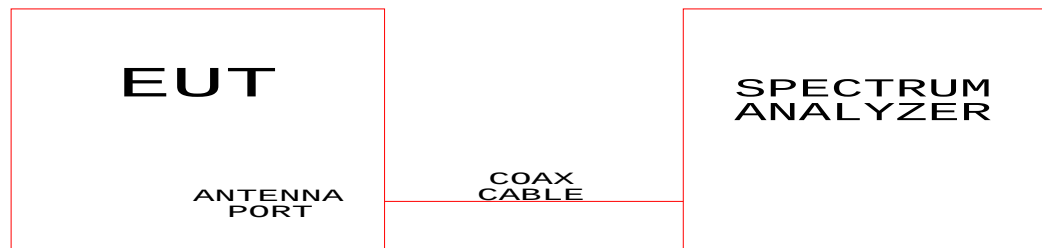
RBW = 3 kHz

VBW = 10 kHz

Type of Equipment	Manufacturer	Model Number	Serial Number
Spectrum Analyzer	Hewlett Packard	8566B	2230A01711
Quasi-Peak Detector	Hewlett Packard	85650A	2043A00137
Spectrum Analyzer/Receiver	Rohde & Schwarz	1302.6005.40	100064
Low Loss Cable (1 dB)	N/A	N/A	N/A

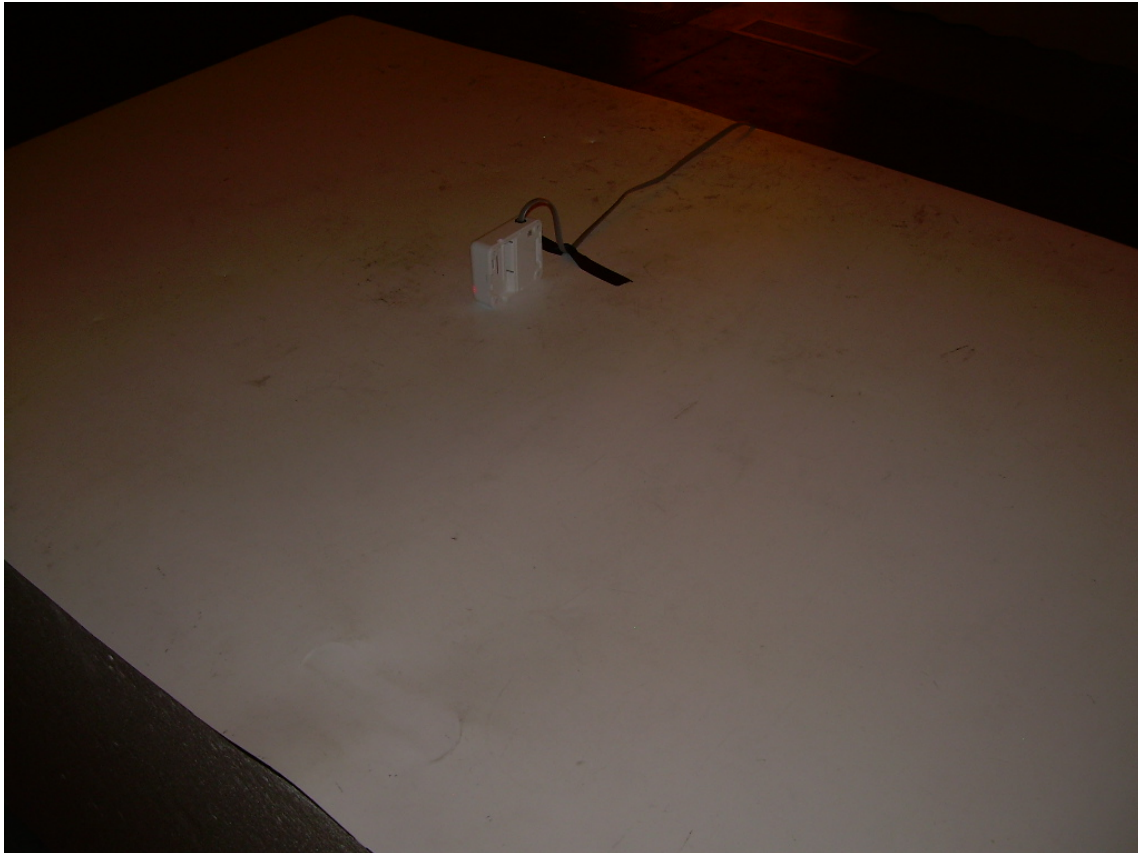
An independent calibration laboratory or Nemko-CCL, Inc. personnel calibrates all the equipment listed above at intervals defined in ANSI C63.4:2003 Section 4.4 following outlined calibration procedures. All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to tractability is on file and is available for examination upon request.

Test Configuration Block Diagram

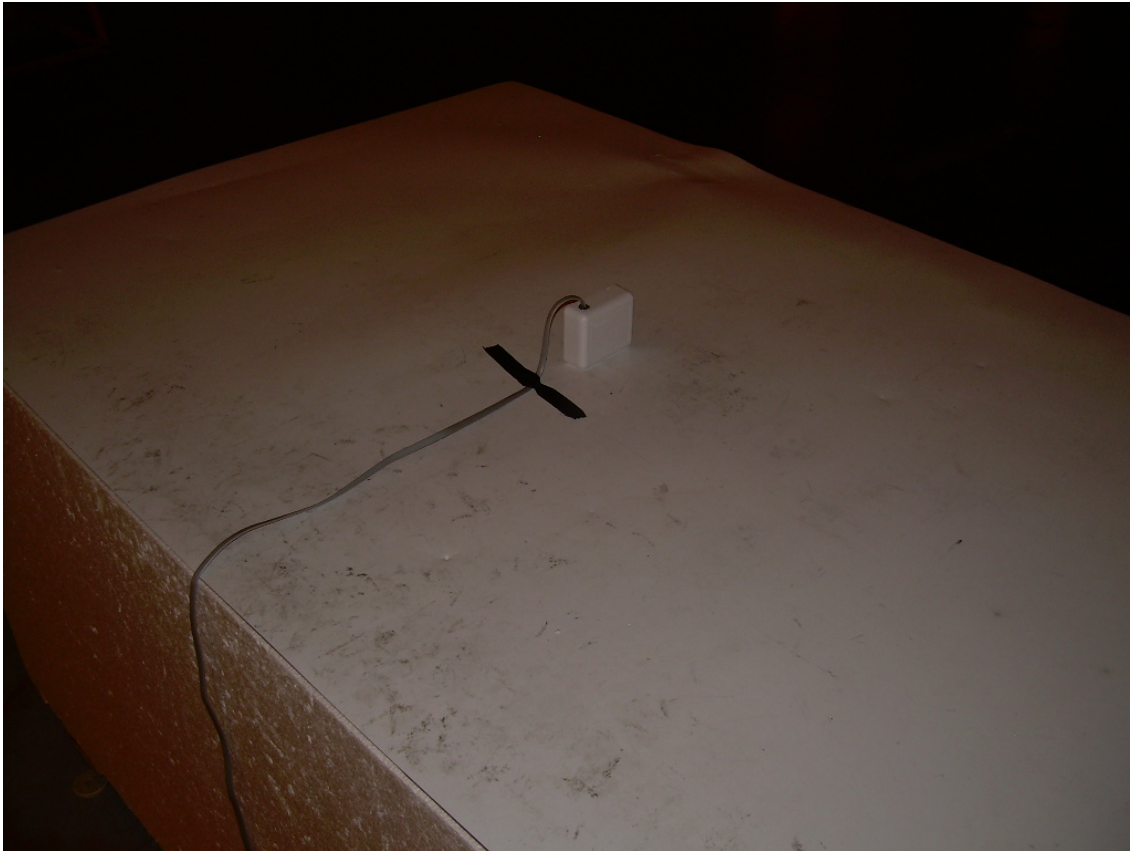


APPENDIX 2 PHOTOGRAPHS

Photograph 1 – Front View Radiated Disturbance Worst Case Configuration
On-Edge Placement



Photograph 2 – Back View Radiated Disturbance Worst Case Configuration
On-Edge Placement



Photograph 3 – Front View Radiated Disturbance Configuration – Vertical Placement



Photograph 4 – Back View Radiated Disturbance Configuration – Vertical Placement



Photograph 5 – View Radiated Disturbance Configuration – Horizontal Placement



Photograph 6 – Front View Conducted Disturbance Worst Case Configuration



A photograph of a desk setup. A black laptop is open on the right side of the desk. To its left, a white USB hub is connected to the laptop via a white USB cable. Several other cables are plugged into the hub. A small, dark, rectangular electronic device, likely a Raspberry Pi, is plugged into one of the ports of the hub. A power strip is visible on the left side of the desk, with several cables plugged into it. The desk surface is light-colored and shows some wear. The background is a plain wall.

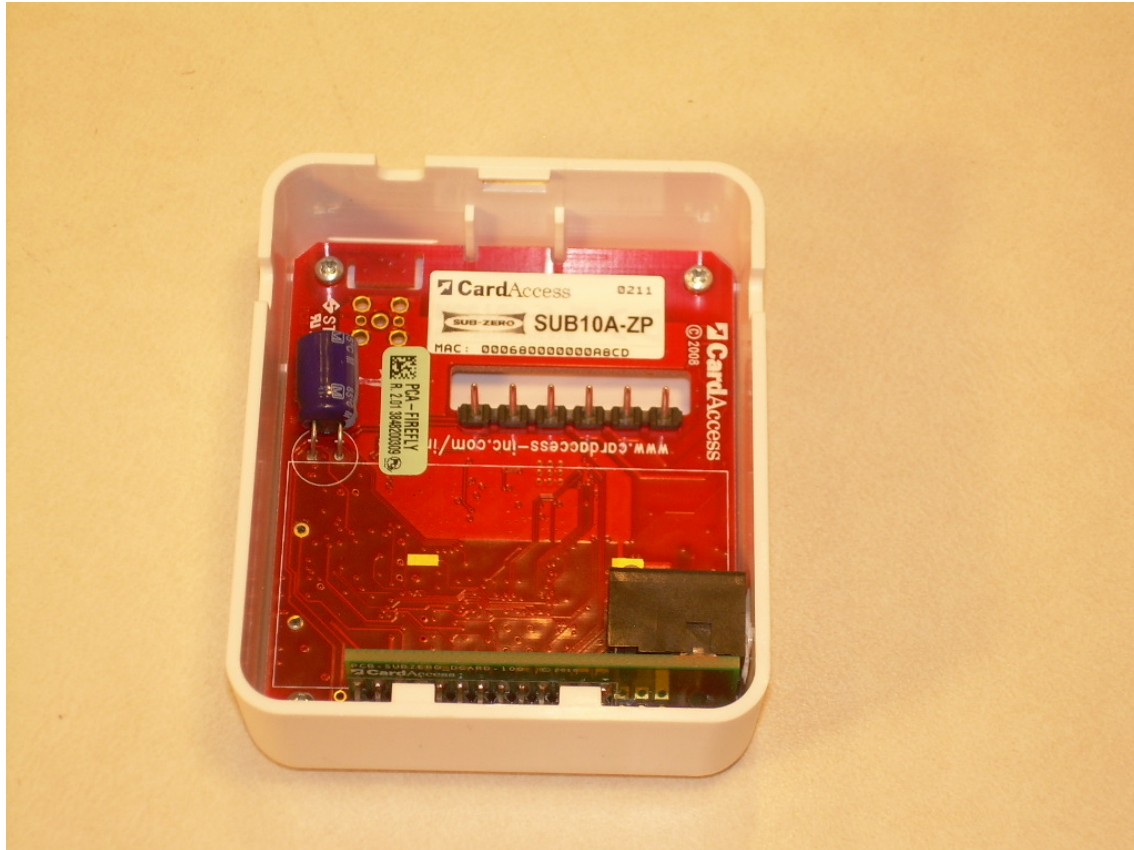
Photograph 8 – Front View of the EUT



Photograph 9 – Back View of the EUT



Photograph 10 – Internal View of the EUT – Back Housing Removed



Photograph 11 – View of the Component Side of the PCB



APPENDIX 3 TRANSMITTER DUTY CYCLE CALCULATIONS**IEEE 802.15.4-2003 2.4 GHz PHY Constants**

Data Rate	250000	bits / sec	
	31250	bytes / sec	
Symbols/byte	2	sym / bytes	
Symbol Timing	62500	sym / sec	
	0.000016	sec / sym	
Byte Timing	0.000032	sec / byte	
PHY PSDU	6	bytes	4 Preamble, SPD, Length
Max Length	127	bytes	
Total Packet Length	133	bytes	
Maximum Time TX PKT	0.004256	sec	

Long Frame Scenario:

- 1) TX Frame Assume Frame is Data Frame
- 2) Wait for ACK
- 3) RX ACK
- 4) CPU Processing of ACK
- 5) Wait for Backoff
- 6) Repeat 1)

MAC-Level Calculation (LIFS)

Long InterFrame Spacing (Slotted w/ ACK)			
Long Frame	127	bytes	
Data Frame Payload	102	bytes	
ACK Frame	5	bytes	
tack	12	sym	
LIFS	40	sym	
Backoff Period	20	sym	
Maximum Backoff	31		Random between 0 and 31
Backoff Required	2		
Backoff Time	300	sym	Average at 15
Transmit Time			
TX Time (Packet)	0.004256		
Total TX Time (sec)	0.004256		
NOT Transmit time (RX or Idle)			
Wait for ACK (tack)	0.000192		
RX Time (ACK)	0.000352		
Backoff Time (tbo)	0.0048		
CPU Processing (tcpu)	0.0002		
CCA Assessment (tcca)	0.000128		
Turn Around Time (RX to TX)	0.000192		
Total Off Time (sec)	0.005864		
Total Time (ttotal)	0.01012	(0.004256 + 0.005864)	MAC TX Duty Cycle (On/Total) = 42.06

$$\text{Average Factor} = 20 \log (0.004256 / 0.01012) = -7.52$$