

# FCC PART 95

## EMI MEASUREMENT AND TEST REPORT

For

### Shenzhen Bao An Hantong Electronics Factory

Block 11 & 12, Jinbi Industrial Area, Hwang Tian, Baoan,  
Shenzhen, Guangdong, China 518102

**FCC ID: O632232LD02**

August 9, 2002

<b>This Report Concerns:</b> <input checked="" type="checkbox"/> Original Report	<b>Equipment Type:</b> FRS / GMRS
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**Note:** This test report is specially limited to the above client company and product model. It may not be duplicated without prior written consent of Bay Area Compliance Laboratory Corporation. This report **must not** be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government.

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## 1 - GENERAL INFORMATION

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### 1.1 Product Description for Equipment Under Test (EUT)

The *Shenzhen Bao An Hantong Electronics Factory*'s 2252, 2232 or the "EUT" as referred to in this report is a lightweight, compact two-way communication device.

The EUT is powered by 6V battery (4 x 1.5V "AAA" battery). Input current to EUT at 6.0V d.c. is 0.14A.

The EUT measures approximately 2.4' L x 1.5' W x 6.75' H.

*\* The test data was only good for test sample. There may have deviation for other product samples.*

### 1.2 Objective

This report is prepared on behalf of *Shenzhen Bao An Hantong Electronics Factory* in accordance with Part 95 Subpart B and Subpart H of the Federal Communication Commissions rules.

The objective of the manufacturer is to demonstrate compliance with FCC rules for effective radiated power, modulation characteristics, occupied bandwidth, radiated spurious emissions, AC line conducted emissions and frequency stability.

### 1.3 Test Methodology

Measurements contained in this report were also conducted with TIA/EIA Standard 603, Telecommunications Industry Association Land Mobile FM or PM Communications Equipment Measurement and Performance Standards.

All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratory, Corp. The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

### 1.4 Test Facility

The Open Area Test site used by Bay Area Compliance Laboratory Corporation to collect radiated and conducted emission measurement data is located in the back parking lot of the building at 230 Commercial Street, Sunnyvale, California, USA.

Test site at Bay Area Compliance Laboratory Corporation has been fully described in reports submitted to the Federal Communication Commission (FCC) and Voluntary Control Council for Interference (VCCI). The details of these reports has been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on February 11 and December 10, 1997 and Article 8 of the VCCI regulations on December 25, 1997. The facility also complies with the radiated and AC line conducted test site criteria set forth in ANSI C63.4-2002.

The Federal Communications Commission and Voluntary Control Council for Interference has the reports on file and is listed under FCC file 31040/SIT 1300F2 and VCCI Registration No.: C-1298 and R-1234. The test site has been approved by the FCC and VCCI for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, Bay Area Compliance Laboratory Corporation is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (NVLAP). The scope of the accreditation covers the FCC Method - 47 CFR Part 15 - Digital Devices, IEC/CISPR 22: 2002, and AS/NZS CISPR 22: 2002 Electromagnetic Interference - Limits and Methods of Measurement of Information Technology Equipment test methods under NVLAP Lab Code 200167-0.

## 1.5 Test Equipment List

Manufacturer	Description	Model	Serial Number	Cal. Due Date
HP	Spectrum Analyzer	8564E	08303	12/6/02
HP	Spectrum Analyzer	8593B	2919A00242	12/20/02
HP	Amplifier	8349B	2644A02662	12/20/02
HP	Quasi-Peak Adapter	85650A	917059	12/6/02
HP	Amplifier	8447E	1937A01046	12/6/02
A.H. System	Horn Antenna	SAS0200/571	261	12/27/02
Com-Power	Log Periodic Antenna	AL-100	16005	11/2/02
Com-Power	Biconical Antenna	AB-100	14012	11/2/02
Solar Electronics	LISN	8012-50-R-24-BNC	968447	12/28/02
Com-Power	LISN	LI-200	12208	12/20/02
Com-Power	LISN	LI-200	12005	12/20/02
BACL	Data Entry Software	DES1	0001	12/20/02
Rohde & Schwarz	Signal Generator	SMIQ03B	1125.5555.03	7/10/03
Rohde & Schwarz	I/Q Modulation Generator	AMIQ	1110.2003.02	8/10/02

**\* Statement of Traceability:** Bay Area Compliance Laboratory Corp. certifies that all calibration has been performed using suitable standards traceable to NATIONAL INSTITUTE of STANDARDS and TECHNOLOGY. (NIST)

## **2 - SYSTEM TEST CONFIGURATION**

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### **2.1 Justification**

The EUT was tested under typical operating modes to represent the worst-case results during the final qualification test.

### **2.2 EUT Exercise Software**

The EUT was powered and fully operated with option speaker/microphone connected. The unit was powered from 4 fully charged AAA batteries. The sequence used is as follows:

### **2.3 Special Accessories**

As shown in section 2.5, interface cable used for compliance testing is shielded as normally supplied by customer and its respective support equipment manufacturers.

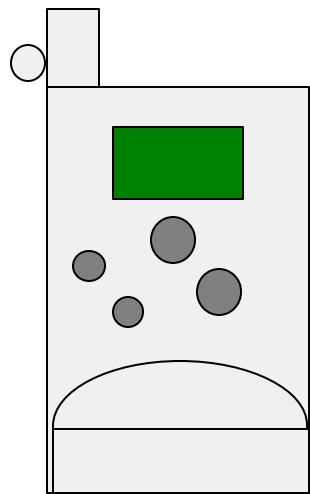
### **2.4 Schematics / Block Diagram**

Appendix A contains a copy of the EUT's schematics diagram as reference. EUT's schematics diagram is not available in this report.

### **2.5 Equipment Modifications**

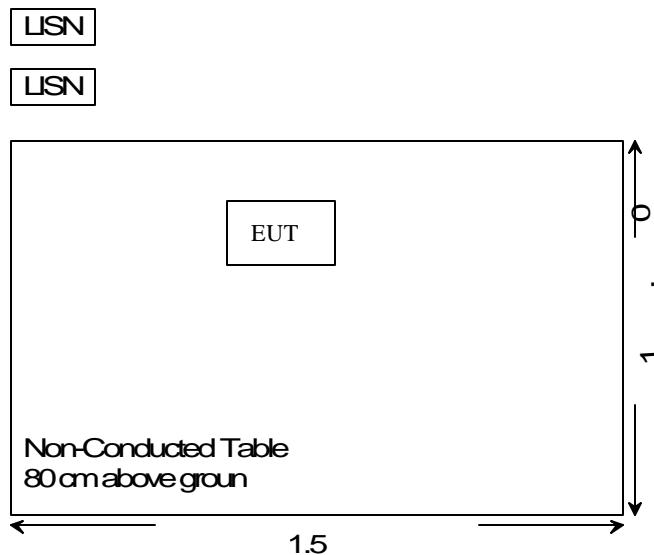
No modification was made by BACL Corp. to make sure the EUT to comply with the applicable limits.

## 2.6 Configuration of Test System



## 2.7 Test Setup Block Diagram

For tabletop systems, the EUT shall be centered laterally on the tabletop and its rear shall be flushed with the rear of the table. If the EUT is a stand-alone unit, it shall be placed in the center of the tabletop.



### 3 - REQUIREMENTS OF PROVISIONS

#### 3.1 Requirements and Test Summary

FCC Rules	Rules Description	Test Summary	Result
<b>Transmitter Section</b>			
2.1046 95.639 (d)	Effective Radiated Power	0.118W	Complied
2.1047 95.631 (d) 95.637 (a)	Modulation Characteristics F3E analogy voice Peak Frequency Deviation Audio Frequency Response	Deviation: 2.42kHz < 2.5 kHz	Complied
2.1049 95.633 (c)	Occupied Bandwidth	11 KHz	Complied
2.1053 15.109 (a)	Field Strength of Spurious Radiation	Worst Case Frequency: 925.12MHz Margin: -8.6dB	Complied
15.109 (f) 15.33 (a)	Spurious Emission	Complied	Complied
15.107	Line Conducted Emissions	N/A	Complied
2.1055 95.621	Frequency Stability Vs. Temperature Vs. Voltage	0.00025% < 0.0005%	Complied
<b>Receiver Section</b>			
15.109 (a)	Radiated Emission	Worst Case Frequency: 925.12MHz Margin: -10.2dB	Complied

#### 3.2 Labeling Requirement

Each equipment for which a type acceptance applications is filed on or after May 1, 1981, shall bear an identification plate or label pursuant to §2.295 (Identification of Equipment) and §2.926 (FCC identifier)

## 4 - EFFECTIVE RADIATED POWER

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### 4.1 Provision Applicable

Per FCC §2.1046 and FCC § 95.639 (d), no FRS unit, under any condition of modulation, shall exceed 0.500W effective radiated power (ERP).

Per FCC §2.1046 and FCC § 95.639 (a) (1), no GMRS unit, under any condition of modulation, shall exceed 50W Carrier Power (average TP during one unmodulated RF cycle) when transmission type A1D, F1D, .G1D, A3E, F3E or G3E.

### 4.2 Test Procedure

1. On a test site, the EUT shall be placed at 1.5m height on a turn table, and in the position closest to normal use as declared by the applicant.
2. The test antenna shall be oriented initially for vertical polarization located 3m from EUT to correspond to the frequency of the transmitter.
3. The output of the test antenna shall be connected to the measuring receiver and the quasi-peak detector is used for the measurement.
4. The transmitter shall be switched on, if possible, without modulation and the measuring receiver shall be tuned to the frequency of the transmitter under test.
5. The test antenna shall be raised and lowered through the specified range of height until a maximum signal level is detected by the measuring receiver.
6. The transmitter shall then be rotated through 360° in the horizontal plane, until the maximum signal level is detected by the measuring receiver.
7. The test antenna shall be raised and lowered again through the specified range of height until a maximum signal level is detected by the measuring receiver.
8. The maximum signal level detected by the measuring receiver shall be noted.
9. The transmitter shall be replaced by a tuned dipole (substitution antenna).
10. The substitution antenna shall be orientated for vertical polarization and the length of the substitution antenna shall be adjusted to correspond to the frequency of the transmitter.
11. The substitution antenna shall be connected to a calibrated signal generator.
12. In necessary, the input attenuator setting of the measuring receiver shall be adjusted in order to increase the sensitivity of the measuring receiver.
13. The test antenna shall be raised and lowered through the specified range of height to ensure that the maximum signal is received.
14. The input signal to the substitution antenna shall be adjusted to the level that produces a level detected by the measuring receiver, which is equal to the level noted while the transmitter radiated power was measured, corrected for the change of input attenuator setting of the measuring receiver.
15. The input level to the substitution antenna shall be recorded as power level in dBm, corrected for any change of input attenuator setting of the measuring receiver.

16. The measurement shall be repeated with the test antenna and the substitution antenna orientated for horizontal polarization.
17. The measure of the effective radiated power is the large of the two levels recorded, at the input to the substitution antenna, corrected for gain of the substitution antenna if necessary.

#### 4.3 Test equipment

- Signal Generator  
Manufacturer: Hewlett Packard  
Model: OPT001  
S/N: 3217A04699  
Calibration Due Date: 2/5/03
- Dipole Antenna  
Manufacturer: Com Power Corporation  
Model: AD-100  
S/N: 02222  
Calibration Due Date: 7/23/02

#### 4.4 Test Results

The measured result showed as follows:

Low Channel: 19.83dBm at 462.56MHz  
Middle Channel: 20.72dBm at 462.72MHz  
High Channel: 19.61dBm at 467.71MHz

## 5 - MODULATION CHARACTERISTICS

### 5.1 Provision Applicable

Per FCC § 2.1047 and FCC §95.637 (a), a GMRS transmitter that transmits emission types F3E must not exceed a peak frequency deviation of plus or minus 5 kHz. A FRS unit that transmits emission type F3E must not exceed a peak frequency deviation of plus or minus 2.5 kHz, and the audio frequency response must not exceed 3.125 kHz.

### 5.2 Test Procedure

#### 5.2.1 Audio Frequency Response

The RF output of the transceiver was connected to the input of a FM deviation meter through sufficient attenuation so as not to overload the meter or distort the reading. An audio signal generator was coupled into the external microphone jack of the transceiver, or alternatively, the microphone element was removed the generator output was connected to the microphone connectors.

The audio signal input level was adjusted to obtain 20% of the maximum rated system deviation at 1 kHz, and recorded as  $DEV_{REF}$ . With the audio signal generator level unchanged, set the generator frequency between 300 Hz to 5000 Hz. The transmitter deviations ( $DEV_{FREQ}$ ) were measured and the audio frequency response was calculated as

$$20\log_{10} [DEV_{FREQ} / DEV_{REF}]$$

#### 5.2.2 Audio Low-Pass Filter Response

An audio signal generator and an audio spectrum analyzer were connected to the input and output of the post limiter low pass filter respectively. The audio signal generator frequency was set between 1000 Hz and the upper low pass filter limit. The audio frequency response at test frequency was calculated as

$$LEV_{FREQ} - LEV_{REF}$$

#### 5.2.3 Modulation Limiting

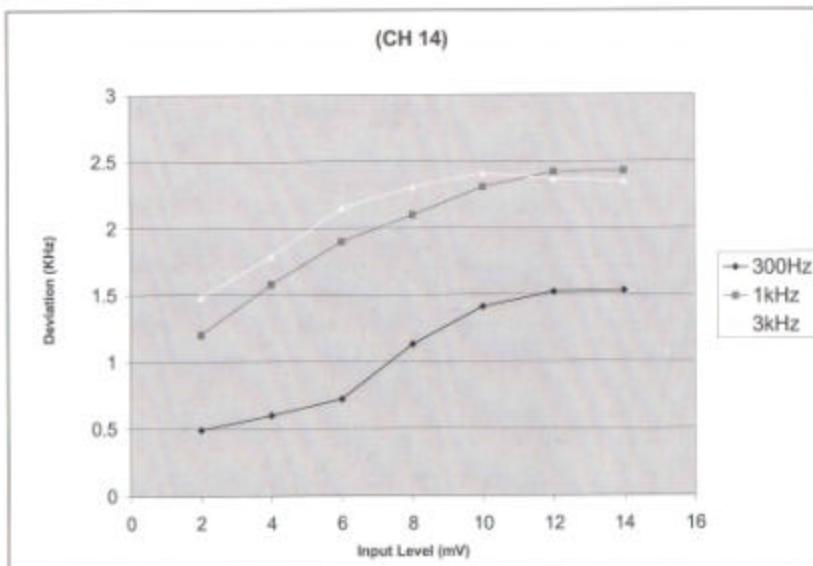
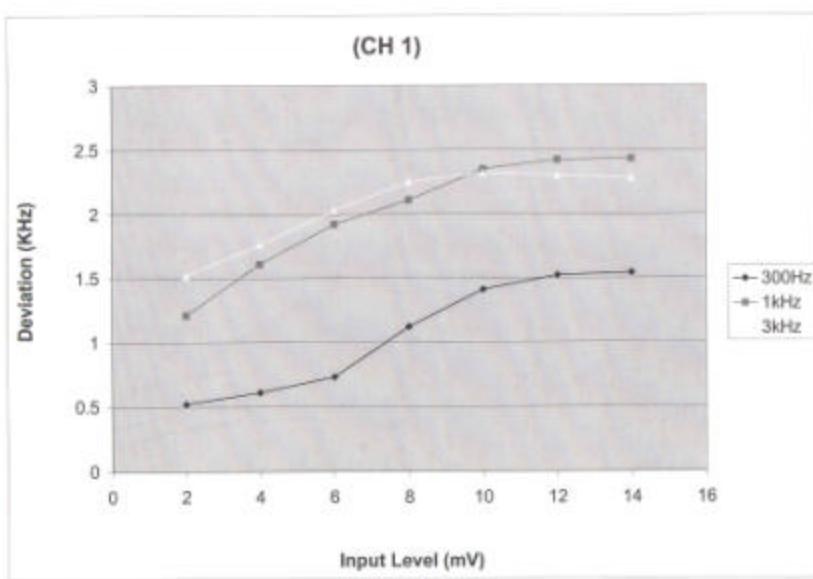
With the same setup as section 5.2.1 above, at three different modulating frequencies, the output level of the audio generator was varied and the FM deviation level was recorded.

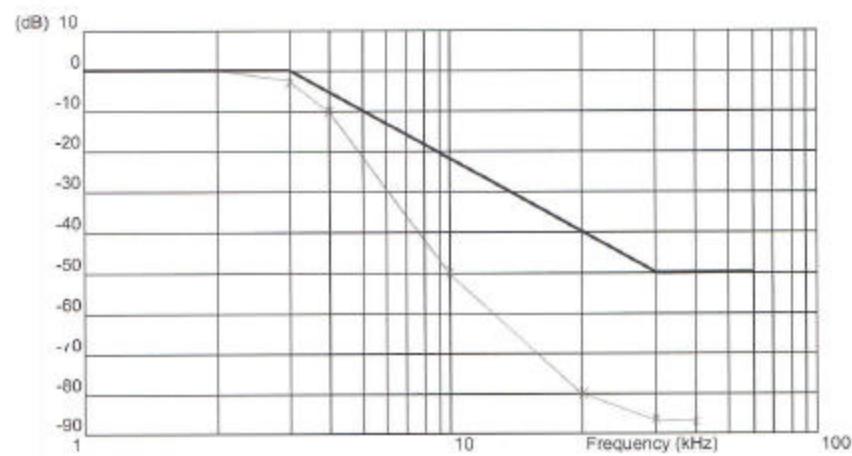
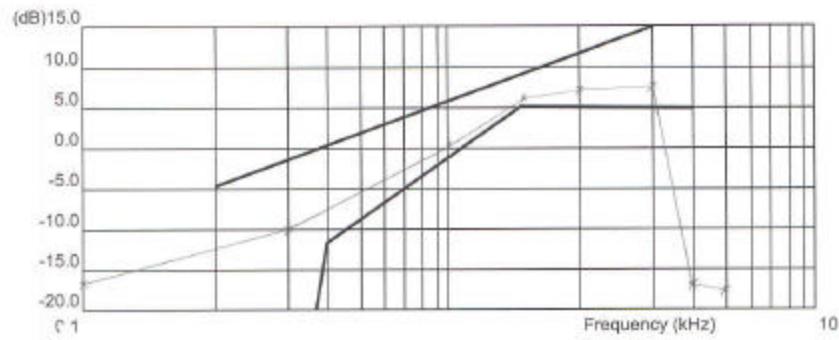
### 5.3 Test Equipment

Hewlett Packard HP8566B Spectrum Analyzer  
Hewlett Packard HP 7470A Plotter  
Hewlett Packard HP8901A Modulation Analyzer  
Lecroy 9350A Oscilloscope

### 5.4 Test Results

The plot(s) of modulation characteristic is presented hereinafter as reference.





## 6 - OCCUPIED BANDWIDTH OF EMISSION

### 6.1 Provision Applicable

Per FCC §2.1049 and FCC §95.633 (a), the authorized bandwidth for emission type F3E transmitted is 20 kHz.

Per FCC §2.1049 and FCC §95.633 (c), the authorized bandwidth for emission type F3E transmitted by a FRS unit is 12.5 kHz.

### 6.2 Test Procedure

The antenna was disconnected from the transmitter and the short cable was connected to the transmitter RF output.

The RF output was connected to the input of the spectrum analyzer through sufficient attenuation.

The resolution bandwidth of the spectrum analyzer was set up at least 10 times higher than the authorized bandwidth of the transmitter. With the transmitter keyed, the level of the unmodulated carrier was set to the full scale reference line of the spectrum analyzer. This is used as a 0dB reference for emission mask measurements.

The transmitter was then modulated with a 2500 Hz tone at an input level 20 dB greater than the necessary to produce 50% of rated system deviation. The resolution bandwidth of the spectrum analyzer was set up to 100 Hz and the spectrum of the transmitting signal was recorded. This spectrum was compared to the required emission mask.

### 6.3 Test Equipment

Leader LFG-1300S Function Generator  
Hewlett Packard HP8566B Spectrum Analyzer  
Hewlett Packard HP 7470A Plotter

### 6.4 Test Results

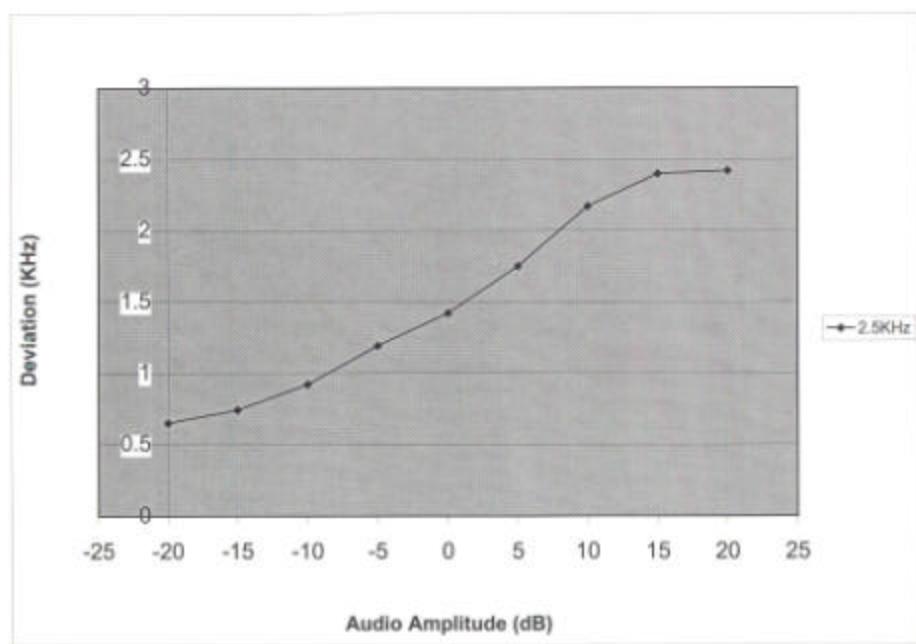
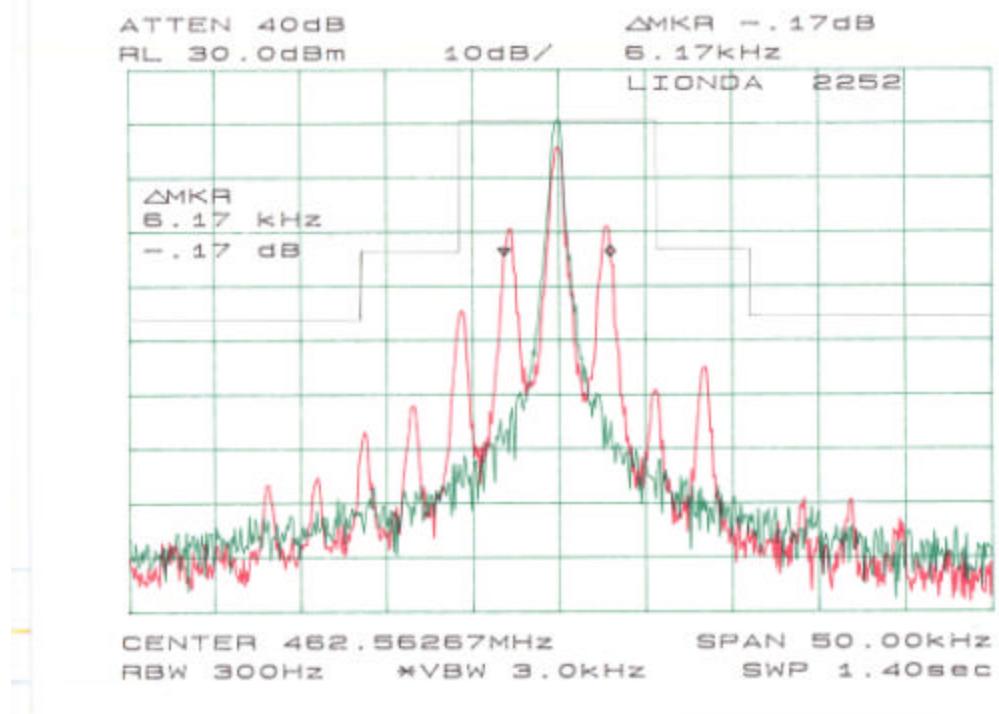
Test Result: Pass

Please refer the following curve and plots.

Note: The occupied band width plot is an antenna conducted one. However, it is not exact for conducted power. Unfortunately, the value seems to be the same as the EIRP value.

### 6.5 Emission Designator

$$2M + 2D = (2 \times 3 \text{ kHz}) + (2 \times 2.50 \text{ kHz}) = 11\text{K0F3E}$$



## 7 - RADIATED SPURIOUS EMISSION

### 7.1 Provision Applicable

According to FCC §2.1053, measurements shall be made to detect spurious emission that may be radiated directly from the cabinet, control circuits, power leads, or intermediated circuit elements under normal condition of installation and operation. Information submitted shall include the relative radiated power of spurious emission with reference to the rated power output of the transmitter, assuming all emissions are radiated from a halfwave dipole antenna.

### 7.2 Test Procedure

The transmitter was placed on a wooden turntable, and it was transmitting into a non-radiating load which was also placed on the turntable.

The measurement antenna was placed at a distance of 3 meters from the EUT. During the tests, the antenna height and polarization as well as EUT azimuth were varied in order to identify the maximum level of emissions from the EUT. The test was performed by placing the EUT on 3-orthogonal axis.

The frequency range up to tenth harmonic of the fundamental frequency was investigated.

Remove the EUT and replace it with substitution antenna. A signal generator was connected to the substitution antenna by a non-radiating cable. The absolute levels of the spurious emissions were measured by the substitution.

Spurious emissions in dB =  $10 \lg (\text{TXpwr in Watts}/0.001)$  – the absolute level

Spurious attenuation limit in dB =  $43 + 10 \log_{10} (\text{power out in Watts})$

Spurious emission limit in dBm:

Carrier TXpwr in dBm –  $(43 + 10\lg(\text{Carrier TXpwr in Watts}))$

### 7.3 Test Equipment

CDI B100/200/300 Biconical Antennas

EMCO Bi-logcon Antenna

EMCO 3115 Horn Antenna

HP 8566B Spectrum Analyzer

Preamplifiers

HP8640 Generator

Non-radiating Load

### 7.4 Test Result

Low Frequency: -8.6dB at 925.12MHz

Middle Frequency: -10dB at 925.44MHz

High Frequency: -11.8dB at 935.42MHz

The detailed test data was presented hereinafter as reference.

## Low Frequency, 30 - 5000MHz

EUT					Generator							Standard	
Indicated		Table	Test Antenna		Substitution		Substitution Antenna		Correction Factor		Absolute level	FCC	FCC
Frequency	Ampl.	Angle	Height	Polar	Frequency	Level	Half-wave	Polar	Antenna	Cable	dBm	Limit	Margin
MHz	dB $\mu$ V/m	Degree	Meter	H/V	MHz	dBm	cm	H/V	dB	dB		dB	dB
462.56	119.4	0	1.2	V	462.56	18.2	70	H	2.1	-0.5	19.83		
462.56	112.5	30	1	H	462.56	13.6	70	V	2.1	-0.5	15.21		
925.12	56.2	260	1.2	V	925.12	-24.7	25	H	3.6	-0.5	-21.6	-13	-8.6
925.12	55.3	210	1.5	H	925.12	-25.5	25	V	3.6	-0.5	-22.4	-13	-9.4
1387.68	45.7	310	1.5	V	1387.68	-32.4	11	V	4.5	-0.7	-28.6	-13	-15.6
1387.68	46.2	160	1.2	H	1387.68	-33.6	11	H	4.5	-0.7	-29.8	-13	-16.8

## Middle Frequency, 30 - 5000 MHz

EUT					Generator							Standard	
Indicated		Table	Test Antenna		Substitution		Substitution Antenna		Correction Factor		Absolute level	FCC	FCC
Frequency	Ampl.	Angle	Height	Polar	Frequency	Level	Half-wave	Polar	Antenna	Cable	dBm	Limit	Margin
MHz	dB $\mu$ V/m	Degree	Meter	H/V	MHz	dBm	cm	H/V	dB	dB		dB	dB
462.72	120.1	180	1.2	V	462.72	19.1	70	H	2.1	-0.5	20.72		
462.72	114.8	120	1.5	H	462.72	15.2	70	V	2.1	-0.5	16.77		
925.44	55.4	45	1.5	V	925.42	-26.1	25	V	3.6	-0.5	-23	-13	-10
925.44	53.2	90	1.2	H	925.42	-27.5	25	H	3.6	-0.5	-24.4	-13	-11.4
1388.16	47.9	250	1.2	H	1388.13	-30.4	11	H	4.5	-0.7	-26.6	-13	-13.6
1388.16	46.5	330	1.5	V	1388.13	-32.7	11	V	4.5	-0.7	-28.9	-13	-15.9

## High Frequency, 30 - 5000 MHz

EUT					Generator							Standard	
Indicated		Table	Test Antenna		Substitution		Substitution Antenna		Correction Factor		Absolute level	FCC	FCC
Frequency	Ampl.	Angle	Height	Polar	Frequency	Level	Half-wave	Polar	Antenna	Cable	dBm	Limit	Margin
MHz	dB $\mu$ V/m	Degree	Meter	H/V	MHz	dBm	cm	H/V	dB	dB	dBm	dB	dB
467.71	120.8	310	1.2	V	467.71	18	70	V	2.1	-0.5	19.61		
467.71	113.9	0	1.2	H	467.71	13.8	70	H	2.1	-0.5	15.43		
935.42	53.8	90	1.2	H	935.42	-27.9	25	H	3.6	-0.5	-24.8	-13	-11.8
935.42	51.6	30	1.5	V	935.42	-28.4	25	V	3.6	-0.5	-25.3	-13	-12.3
1403.13	44.7	160	1.2	V	1403.13	-33.6	11	V	4.5	-0.7	-29.8	-13	-16.8
1403.13	46.2	250	1.5	H	1403.13	-34.7	11	H	4.5	-0.7	-30.9	-13	-17.8

### Compliance Statement:

According to FCC Part 15, at 3-meter distance the emission from an intentional radiator shall not exceed the field strength level 40dB $\mu$ V/m within 30-88MHz, 43.5dB $\mu$ V/m within 88-216MHz, 46dB $\mu$ V/m within 226-960MHz, 54dB $\mu$ V/m above 960MHz. The level of any unwanted emissions shall not exceed the level of the fundamental frequency.

The levels of unwanted emission of this device were below the above limits. This device was compliant with the FCC Part 15.

## 8 - FREQUENCY STABILITY MEASUREMENT

### 8.1 Provision Applicable

According to FCC §2.1055(a)(1), the frequency stability shall be measured with variation of ambient temperature from  $-30^{\circ}\text{C}$  to  $+50^{\circ}\text{C}$ , and according to FCC 2.1055(d)(2), the frequency stability shall be measured with reducing primary supply voltage to the battery operating end point which is specified by the manufacturer.

According to FCC §95.621 (a), the GMRS transmitter channel frequencies (reference frequencies from which the carrier frequency, suppressed or otherwise, may not deviate by more than the specified frequency to tolerance) are 462.5500, 462.5625, 462.5750, 462.5875, 462.6000, 462.6125, 462.6250, 462.6375, 462.6500, 462.6625, 462.6750, 462.6875, 462.7000, 462.7125, 462.7250, 467.5500, 467.5750, 467.6000, 467.6250, 467.6500, 467.6750, 467.7000 and 467.7250.

According to FCC §95.621 (b), each GMRS transmitter for mobile station, small base station and control station operation must be maintained within a frequency tolerance of 0.0005%. Each GMRS transmitter for base station (except small base), mobile relay station or fixed station operation must be maintained within a frequency tolerance of 0.00025%.

According to FCC §95.627, each FRS unit must be maintained within a frequency tolerance of 0.00025%.

### 8.2 Test Procedure

#### 8.2.1 Frequency stability versus environmental temperature

The equipment under test was connected to an external DC power supply and the RF output was connected to a frequency counter via feedthrough attenuators. The EUT was placed inside the temperature chamber.

After the temperature stabilized for approximately 20 minutes, the frequency of the output signal was recorded from the counter.

#### 8.2.2 Frequency Stability versus Input Voltage

At room temperature ( $25 \pm 5^{\circ}\text{C}$ ), an external variable DC power supply was connected to the EUT. The frequency of the transmitter was measured for 115%, 100% and 85% of the nominal operating input voltage.

### 8.3 Test Equipment

Temperature Chamber,  $-50^{\circ}\text{C}$  to  $+100^{\circ}\text{C}$   
Hewlett Packard HP8566B Spectrum Analyzer  
Hewlett Packard HP 7470A Plotter  
Hewlett Packard HP 5383A Frequency Counter  
Goldstar DC Power Supply, GR303

## 8.4 Test Results

Reference Frequency: 462.5625 MHz, Limit: 0.00025%			
Environment Temperature (°C)	Power Supplied (Vdc)	Frequency Measure with Time Elapsed	
		MCF (MHz)	PPM Error
50	New Batt.	462.5625	0.0
40	New Batt.	462.5627	0.8
30	New Batt.	462.5620	-1.1
20	New Batt.	462.5623	-0.4
10	New Batt.	462.5624	-0.2
0	New Batt.	462.5624	-0.2
-10	New Batt.	462.5620	-1.1
-20	New Batt.	462.5632	1.5
-30	New Batt.	462.5630	1.1

### Frequency Stability Versus Input Voltage

Power Supplied (Vdc)	Reference Frequency: 462.5625 MHz, Limit: 0.00025%					
	Frequency Measure with Time Elapsed					
	2 Minutes		5 Minutes		10 Minutes	
MHz	%	MHz	%	MHz	%	
6.5Vdc	462.5617	-1.7	462.5625	0.0	462.5624	-0.2
6.5Vdc	462.5620	-1.1	462.5624	-0.2	462.5619	-1.3
6Vdc	462.5615	-2.1	462.5619	-1.3	462.5629	0.9
6Vdc	462.5628	0.6	462.5625	0.0	462.5627	0.5
4.8Vdc	462.5628	0.6	462.5629	0.9	462.5625	0.0
4.8Vdc	462.5625	0.0	462.5617	-1.7	462.5625	0.0

End Point = 4.8 V

Conclusion: The EUT complied with the applicable Frequency Stability Limits.

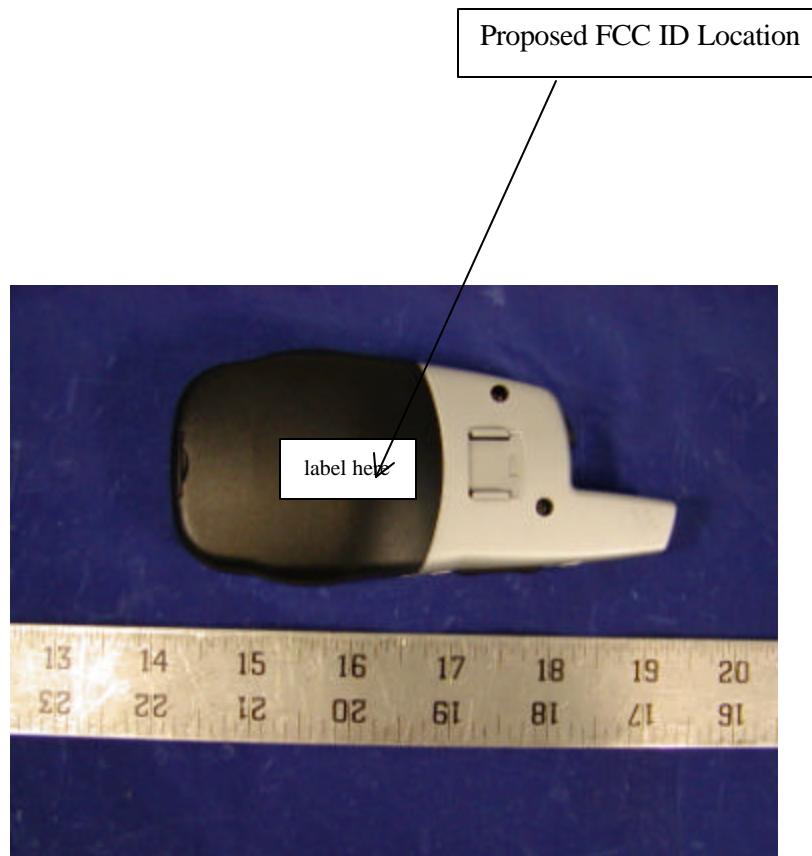
## 9 - FCC ID Labeling and Location

### 9.1 Proposed FCC ID Labeling

FCC ID: O632232LD02

### 9.2 Proposed FCC ID Location

Rear Side of EUT



## 10 - Test Setup Photographs

### 10.1 Radiated Emission Setup - Front View



### 10.2 Radiated Emission Setup - Rear View



## 11 - EUT Photographs

### 11.1 EUT - Top View



### 11.2 EUT - Front View



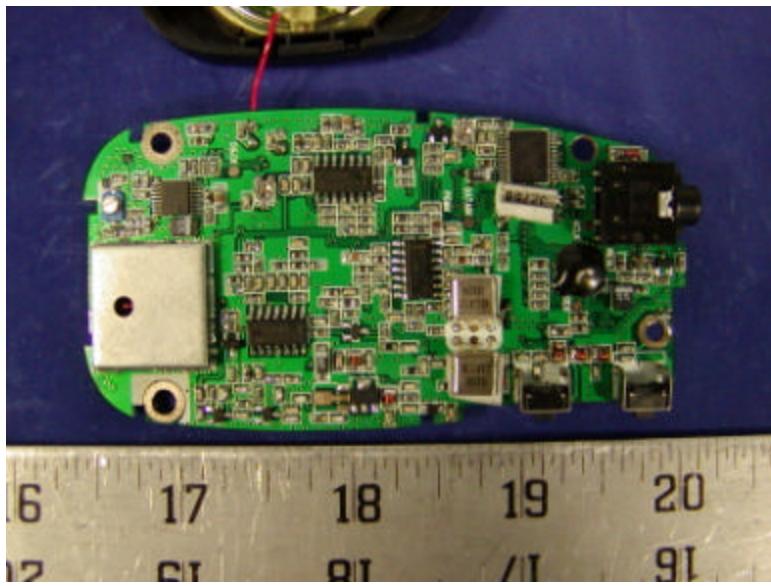
### 11.3 EUT - Rear View



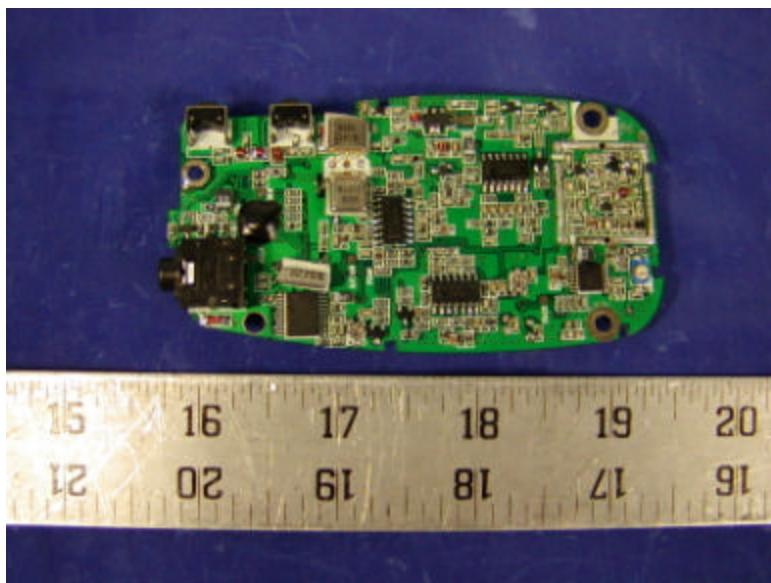
### 11.4 EUT – Port Side View



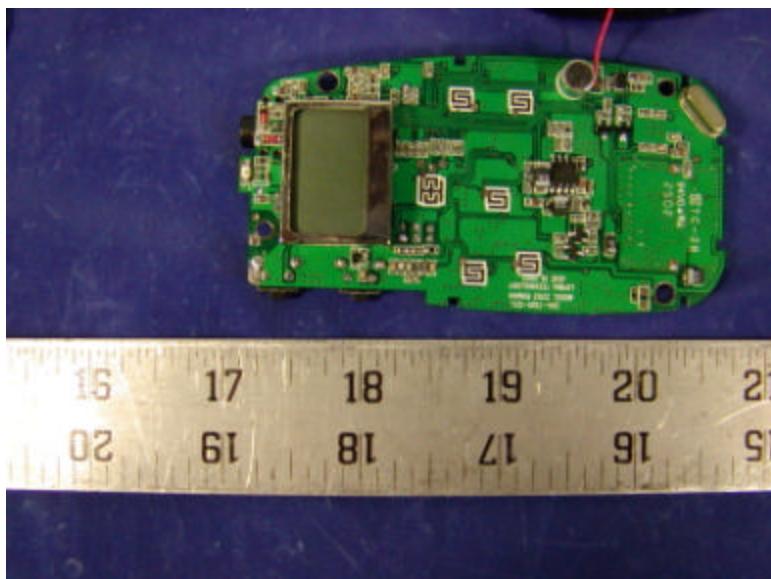
### 11.5 EUT – Component View



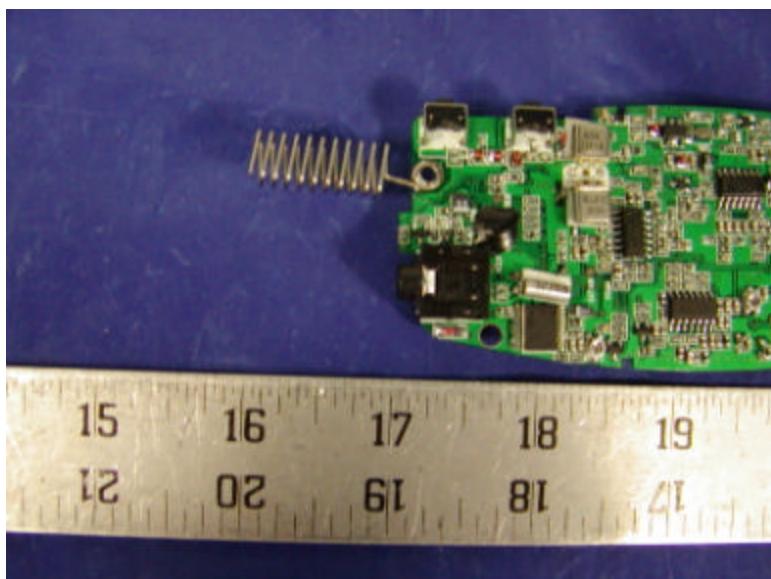
### 11.6 EUT – Component Cover off View



### 11.7 EUT – Solder View



### 11.8 EUT – Antenna View



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**Appendix A - Block Diagram/Schematics/Parts List**

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## **Appendix B - Tuning-up Procedure**

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## **Appendix C - Operational Description**

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## **Appendix D - Users Manual**

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