



FCC PART 15, SUBPART C ISED C RSS-247, Issue 3

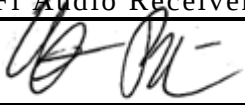
TEST REPORT

For

Listen Technologies Corporation

14912 Heritage Crest Way
Bluffdale, UT 84065-4818, USA

FCC ID: OMD1050
IC: 4011A-LWR1050

Report Type: Class II Permissive Change	Product Type: Wi-Fi Audio Receiver
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Report Number: R2403213-249	
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Note: This test report was prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This test report shall not be used by the customer to claim product certification, approval, or endorsement by A2LA or any agency of the United States Government or any foreign government.

* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "*"

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2403213-249	C2PC Report	2024-08-05

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report is prepared on behalf of *Listen Technologies Corporation*, and their product model: LWR-1050, FCC ID: OMD1050, IC: 4011A-LWR1050, the “EUT” as referred to in this report. The EUT is a Wi-Fi Audio Receiver and has Wi-Fi (2.4GHz and 5GHz) and Bluetooth capabilities.

1.2 Mechanical Description of EUT

The EUT measures approximately 10.0 cm (H) x 5.4 cm (W) x 1.6 cm (D) and weighs approximately 0.08 kg.

The data gathered was from a production sample provided by Listen Technologies Corporation with S/N: C24A6D00006

1.3 Objective

This report is prepared on behalf of *Listen Technologies Corporation*, in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission’s rules and ISEDC RSS-247 Issue 3.

The purpose of this report is to determine compliance for a Class II Permissive Change of adding new antenna to the module and updating classification from mobile device to a portable device.

The objective is to determine compliance with FCC Part 15.247 and ISEDC RSS-247 for Antenna Requirement, RF Exposure, Radiated Spurious Emissions, and Band Edge Measurements.

In order to determine compliance, the manufacturer or a contracted laboratory makes measurements and takes the necessary steps to ensure that the equipment complies with the appropriate technical standards.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product maybe which result in lowering the immunity should be checked to ensure compliance has been maintained (i.e., printed circuit board layout changes, different line filter, different power supply, harnessing and/or I/O cable changes, etc.).

1.4 Related Submittal(s)/Grant(s)

FCC Part 15, Subpart E, Equipment Class: NII with FCC ID: OMD1050, IC: 4011A-LWR1050

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Industry Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.

- For Singapore (Info-Communications Development Authority (IDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2

- For the Hong Kong Special Administrative Region:

- 1 All Radio Equipment, per KHCA 10XX-series Specifications;
- 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
- 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.

- For Japan:

- 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
- 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

The exercising software used during testing was “LWR-RF-Control”, provided by Listen Technologies Corporation. The software is compliant with the standard requirements being tested against.

Radio	Mode	Channel	Frequency (MHz)	Power Setting
BLE	1M	Low	2402	Default
		Middle	2440	Default
		High	2480	Default

Data rates used:
BLE: 1Mbps

RF Output Power Measurements

BLE

Channel	Frequency (MHz)	Measured Power (dBm)	Rated Power (dBm)
Low	2402	6.28	6.37
Middle	2440	5.85	6.37
High	2480	6.17	6.37

2.3 Equipment Modification

No modifications were made to the EUT during testing.

2.4 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude 5401	6QN2533

2.5 Remote Support Equipment

None.

2.6 Power Supply and Line Filters

Manufacturer	Description	Model	Serial Number
Listen	Battery	LA-365	-

2.7 Interface Ports and Cabling

Cable Description	Length (m)	From	To
USB-A to USB micro	1	EUT	Laptop

3 Summary of Test Results

FCC & ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1093, ISED RSS-102	RF Exposure	Compliant
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.249(a) ISEDC RSS-Gen §8.9, §8.10,	Radiated Spurious Emissions	Compliant

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

4 FCC §15.203 & ISEDC RSS-Gen §6.8 – Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

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.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotopically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

External/Internal/ Integral	Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Integral	Chip	2400-2490	1.20

4 FCC §2.1093 & ISED RSS-102 - RF Exposure

4.1 Applicable Standards

According to FCC KDB 447498 D01 General RF Exposure Guidance v06 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

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

$$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

- f (GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:

- a) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · $f(\text{MHz}/150)$] mW, at 100 MHz to 1500 MHz
- b) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz

- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:

- a) The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm
- b) The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm

- c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

According to ISED RSS-102 Issue 5 Section 2.5.1 Exemption Limits for Routine Evaluation-SAR Evaluation:

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

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤ 5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤ 300	71	101	132	162	193
450	52	70	88	106	123
835	17	30	42	55	67
1900	7	10	18	34	60
2450	4	7	15	30	52
3500	2	6	16	32	55
5800	1	6	15	27	41

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥ 50 mm
≤ 300	223	254	284	315	345
450	141	159	177	195	213
835	80	92	105	117	130
1900	99	153	225	316	431
2450	83	123	173	235	309
3500	86	124	170	225	290
5800	56	71	85	97	106

4.2 RF exposure evaluation exemption for FCC

The maximum power of channel, including tune-up tolerance is 6.37dBm(4.34mW). According to FCC KDB 447498,

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] [\sqrt{f(\text{GHz})}] = (4.34 \text{ mW}/5\text{mm}) * \sqrt{2.480} = 1.37$, which is less than 7.5. Therefore, FCC SAR testing is excluded.

4.3 RF exposure evaluation exemption for IC

$7.57 \text{ dBm}(5.71\text{mW}) < (4\text{mW}*2.5) = 10\text{mW}$

Therefore, RF exposure is not required.

NOTE: Maximum EIRP = Rated Power + Antenna Gain = 6.37 dBm + 1.2 dBi = 7.57 dBm.

5 FCC §15.35(b), §15.205, §15.209, §15.249(a) & ISEDC RSS-Gen §8.9, §8.10– Spurious Radiated Emissions

5.1 Applicable Standards

As per FCC §15.35(b): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/F(kHz)	30
1.705 - 30.0	30	30
30 - 88	100**	3
88 - 216	150**	3
216 - 960	200**	3
Above 960	500	3

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per ISED RSS-Gen §8.9,

Except where otherwise indicated in the applicable RSS, radiated emissions shall comply with the field strength limits shown in table 5 and table 6. Additionally, the level of any transmitter unwanted emission shall not exceed the level of the transmitter's fundamental emission.

Table 5 – General field strength limits at frequencies above 30 MHz

Frequency (MHz)	Field Strength ($\mu\text{V/m}$ at 3 m)
30 – 88	100
88 – 216	150
216 – 960	200
Above 960	500

Table 6 – General field strength limits at frequencies below 30 MHz

Frequency	Magnetic Field Strength ($\mu\text{A/m}$)	Measurement Distance (m)
9 – 490 kHz ^{Note 1}	$6.37/F$ (F in kHz)	300
490 – 1705 kHz	$63.7/F$ (F in kHz)	30
1.705 – 30 MHz	0.08	30

Note 1: The emission limits for the ranges 9-90 kHz and 110-490 kHz are based on measurements employing a linear average detector.

As per FCC §15.249(a) Annex 2 section A2.9: Except as provided in paragraph (b) of this section, the field strength of emissions from intentional radiators operated within these frequency bands shall comply with the following:

Frequency (MHz)	Field Strength of Fundamental (millivolts/meter)	Field Strength of Harmonics (microvolts/meter)
902-928	50	500
2400-2483.5	50	500
5725-5875	50	500
24000-24250	250	2500

As per ISED RSS-Gen §8.10(c),

Unwanted emissions that do not fall within the restricted frequency bands listed in table 7 shall comply either with the limits specified in the applicable RSS or with those specified in table 5 and table 6.

Table 7 – Restricted frequency bands^{Note 1}

MHz	MHz	GHz
0.090 – 0.110	149.9 – 150.05	9.0 – 9.2
0.495 – 0.505	156.52475 – 156.52525	9.3 – 9.5
2.1735 – 2.1905	156.7 – 156.9	10.6 – 12.7
3.020 – 3.026	162.0125 – 167.17	13.25 – 13.4
4.125 – 4.128	167.72 – 173.2	14.47 – 14.5
4.17725 – 4.17775	240 – 285	15.35 – 16.2
4.20725 – 4.20775	322 – 335.4	17.7 – 21.4
5.677 – 5.683	399.9 – 410	22.01 – 23.12
6.215 – 6.218	608 – 614	23.6 – 24.0
6.26775 – 6.26825	960 – 1427	31.2 – 31.8
6.31175 – 6.31225	1435 – 1626.5	36.43 – 36.5
8.291 – 8.294	1645.5 – 1646.5	Above 38.6
8.362 – 8.366	1660 – 1710	
8.37625 – 8.38675	1718.8 – 1722.2	
8.41425 – 8.41475	2200 – 2300	
12.29 – 12.293	2310 – 2390	
12.51975 – 12.52025	2483.5 – 2500	
12.57675 – 12.57725	2655 – 2900	
13.36 – 13.41	3260 – 3267	
16.42 – 16.423	3332 – 3339	
16.69475 – 16.69525	3345.8 – 3358	
16.80425 – 16.80475	3500 – 4400	
25.5 – 25.67	4500 – 5150	
37.5 – 38.25	5350 – 5460	
73 – 74.6	7250 – 7750	
74.8 – 75.2	8025 – 8500	
108 – 138		

Note 1: Certain frequency bands listed in table 7 and in bands above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

5.2 Test Setup

The radiated emissions tests were performed in the 5-meter chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC §15.209/205 and ISEDC RSS-GEN limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundled when necessary.

5.3 Test Procedure

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meters, and the EUT was placed on a turntable, which was 0.8 meters and 1.5 meters above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1MHz / VBW = 10Hz or 1/T / Sweep = Auto

5.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = AF + CL + \text{Atten} - Ga$$

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + \text{Atten} - Ga$$

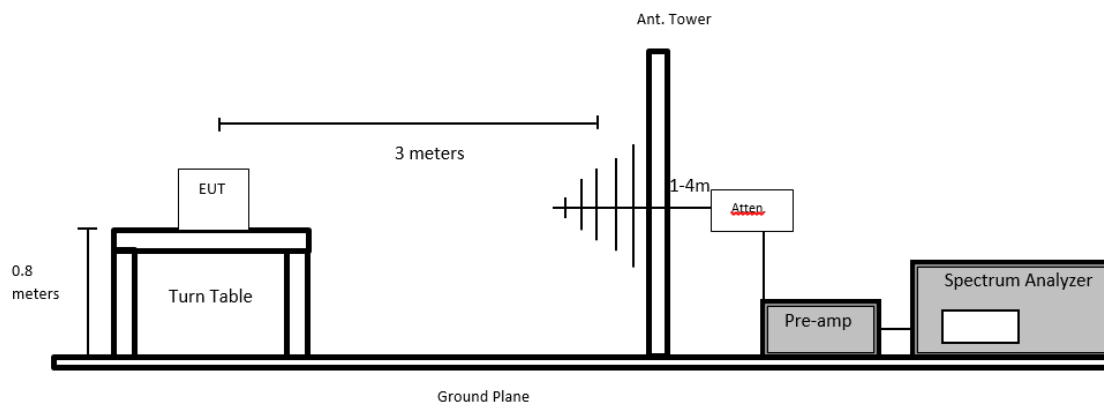
For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

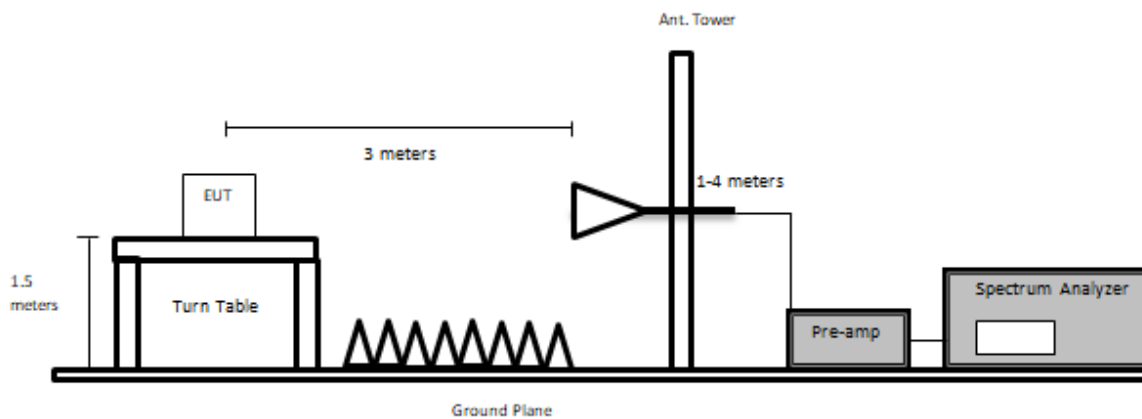
$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

5.5 Test Setup Diagrams

Below 1 GHz at 3 meters distance



Above 1 GHz at 3 meters distance



5.6 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
310	Rhode & Schwarz	EMI Test Receiver	ESCI 1166.5950.03	100338	2024-05-29	1 year
424	Agilent	Spectrum Analyzer	E4440A	US45303156	2024-03-06	1 year
327	Sunol Science Corp	System Controller	SC110V	122303-1	N/R	N/A
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	N/R	N/A
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/A
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2024-02-27	6 months
1449	BACL	Preamplifier	BACL1313-A100M18G	4052472	2024-07-11	6 months
1451	BACL	Preamplifier	BACL-1313-A1840	4052432	2024-07-10	6 months
321	Sunol Sciences	Biconilog Antenna	JB3	A020106-2; 1504	2023-12-18	2 years
1192	ETS Lindgren	Horn Antenna	3117	00218973	2022-09-29	2 years
90	Wisewave	Horn Antenna	ARH-4223-02	10555-01	2023-05-02	2 years
1186	Pasternack	Coaxial Cable, RG214	PE3062-1050CM	1	2024-04-09	1 year
1248	Pasternack	RG214 COAX Cable	PE3062	-	2024-04-04	1 year
1249	Time Microwave	LMR-400 Cable Dc-3 Ghz	AE13684	2k80612-56fts	2024-04-09	1 year
1329	Pasternack	2.92mm short coaxial cable	PE360-12	-	2024-07-10	6 months
1355	Megaphase	2.92mm 236in RF Cable DC to 40GHz	GC12-K1K1-236-H	1 GVT4 20554701001	2024-02-27	1 year
1356	Pasternack	N 28ft RF Cable	RG213	062421	2023-12-11	1 year
1245	-	6dB Attenuator	PE7390-6	01182018A	2022-11-22	2 year
1246	HP	RF Limiter	11867A	01734	2024-04-09	1 year
672	Micro -Tronics	2.4-2.6 GHz Notch Filter	BRM50701	160	2024-03-06	1 year

Note: cables, attenuators and notch filters included in the test set-up were checked each time before testing.

Statement of Traceability: **BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

5.7 Test Environmental Conditions

Temperature:	21 to 25 °C
Relative Humidity:	38 to 45 %
ATM Pressure:	101.8 kPa

The testing was performed by Arturo Reyes from 2024-07-17 to 2024-07-30 in 5m chamber 3.

The testing was performed by Michael Papa on 2024-07-25 in 5m chamber 3.

The testing was performed by Libass Thiaw from 2024-07-29 to 2024-07-30 in 5m chamber 3.

5.8 Summary of Test Results

According to the data hereinafter, the EUT complied with the FCC Part 15.209 and ISEDC RSS-GEN standards’ radiated emissions limits, and had the worst margin of:

Worst Case – Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Configuration
-2.31	17288.125	Vertical	802.11g, 2462 MHz

Please refer to the tables and plots in the next section for detailed test results.

5.9 Radiated Emissions Test Results

Note 1: For Band Edge plots, please refer to Annex A.

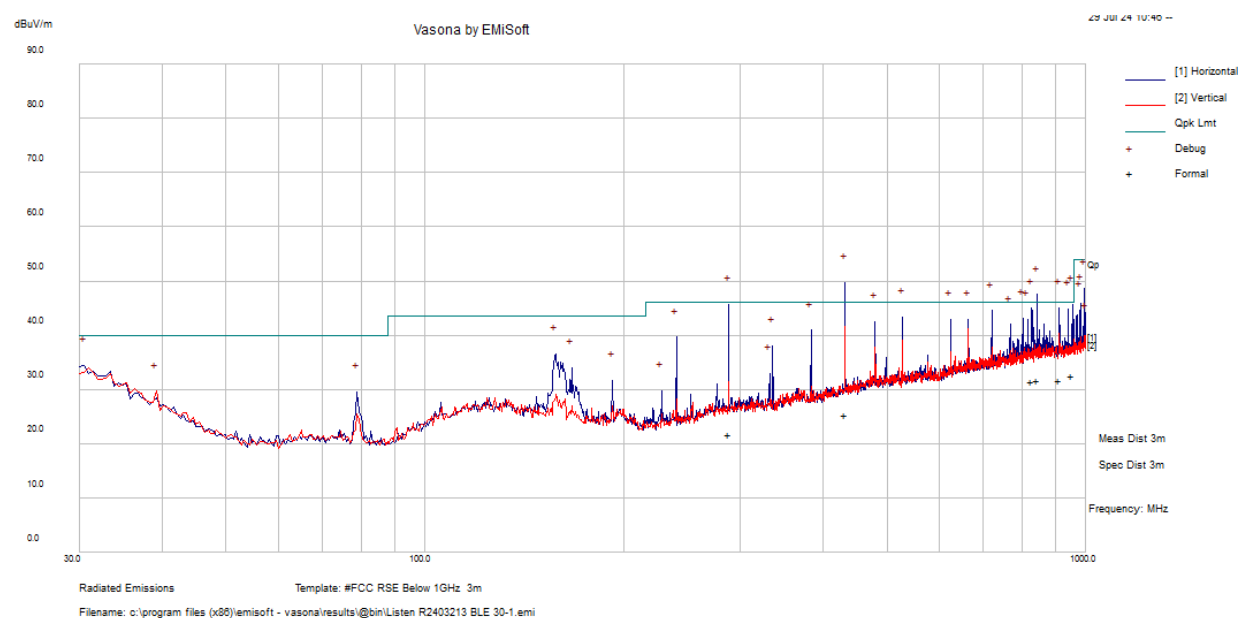
Note 2: The EUT is not transmitting at below 30 MHz, thus 9 kHz to 30 MHz was not evaluated for Spurious Emissions.

Note 3: As per ANSI C63.10 Clause 5.6.2.2, 802.11b, 802.11g, and BLE were determined to be the worst-case modes per modulation family and were used for the following testing.

Note 4: In cases where Peak emissions were shown to comply with average/QP limits, such emissions' measurements positions (i.e. azimuth and height) are shown in nearest step size since scan was performed with a peak/max hold trace at all positions.

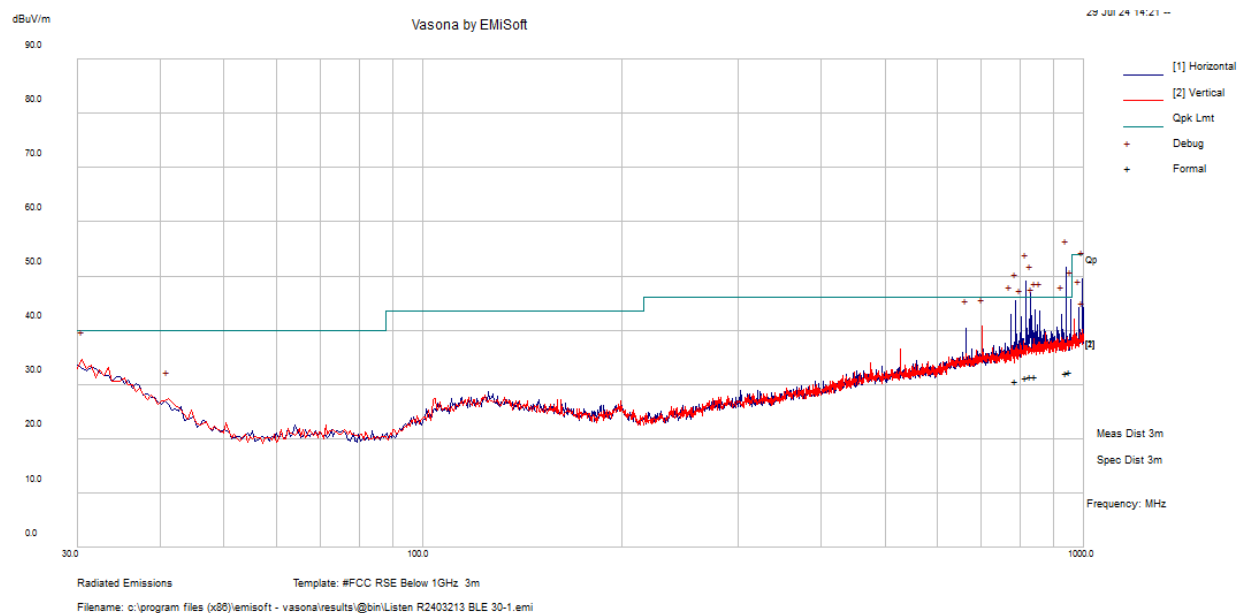
1) 30 MHz – 1 GHz, Measured at 3 meters

BLE, 2402 MHz

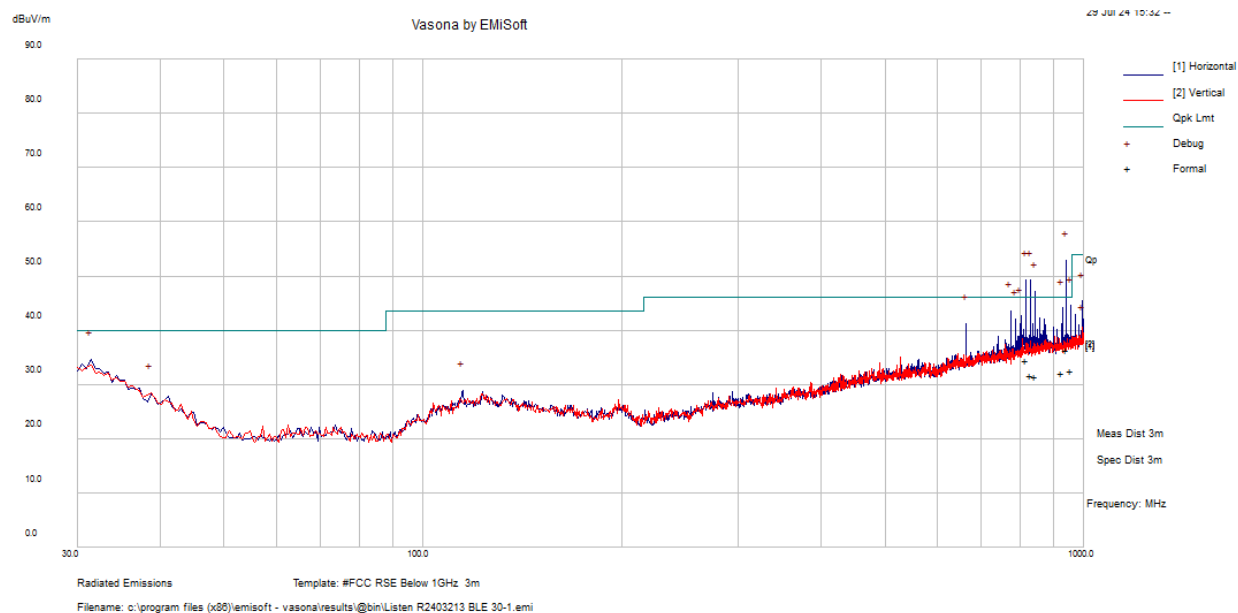


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Detector
431.94825	28.15	-2.9	25.25	132	H	79	46	-20.75	QP
843.9865	27.81	3.79	31.6	251	H	337	46	-14.4	QP
954.4665	27.61	4.89	32.5	188	H	166	46	-13.5	QP
287.9215	28.29	-6.63	21.66	226	H	68	46	-24.34	QP
912.38675	27.41	4.29	31.7	180	H	335	46	-14.3	QP
827.658	27.7	3.68	31.38	286	H	6	46	-14.62	QP

BLE, 2440 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Detector
940.63225	27.53	4.7	32.23	235	H	23	46	-13.77	QP
816.595	27.73	3.63	31.36	259	H	109	46	-14.64	QP
830.002	27.79	3.67	31.46	128	H	210	46	-14.54	QP
954.803	27.54	4.89	32.43	151	H	83	46	-13.57	QP
788.29625	27.82	2.85	30.67	293	H	112	46	-15.33	QP
843.986	27.79	3.79	31.58	169	H	31	46	-14.42	QP

BLE, 2480 MHz

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Detector
940.589	31.75	4.7	36.45	130	H	263	46	-9.55	QP
830.046	27.96	3.67	31.63	130	H	212	46	-14.37	QP
816.574	30.83	3.63	34.46	113	H	118	46	-11.54	QP
844.095	27.78	3.79	31.57	102	H	327	46	-14.43	QP
954.9845	27.56	4.89	32.45	186	H	49	46	-13.55	QP
927.3915	27.62	4.47	32.09	165	H	266	46	-13.91	QP

FCC/IC Limits for 1 GHz to 26.5 GHz				
Applicability	(dBm)	(uV/m at 3meters)	(dBuV/m at 3meters)	(dBuV/m at 1meter)
Restricted Band Average Limit	-	500	54 ²	63.54 ³
Restricted Band Peak Limit ¹	-	-	74	83.54

Note 1: Restricted Band Peak Limit is defined to be 20dB higher than Average Limit.

Note 2: Above 1GHz limit calculation:

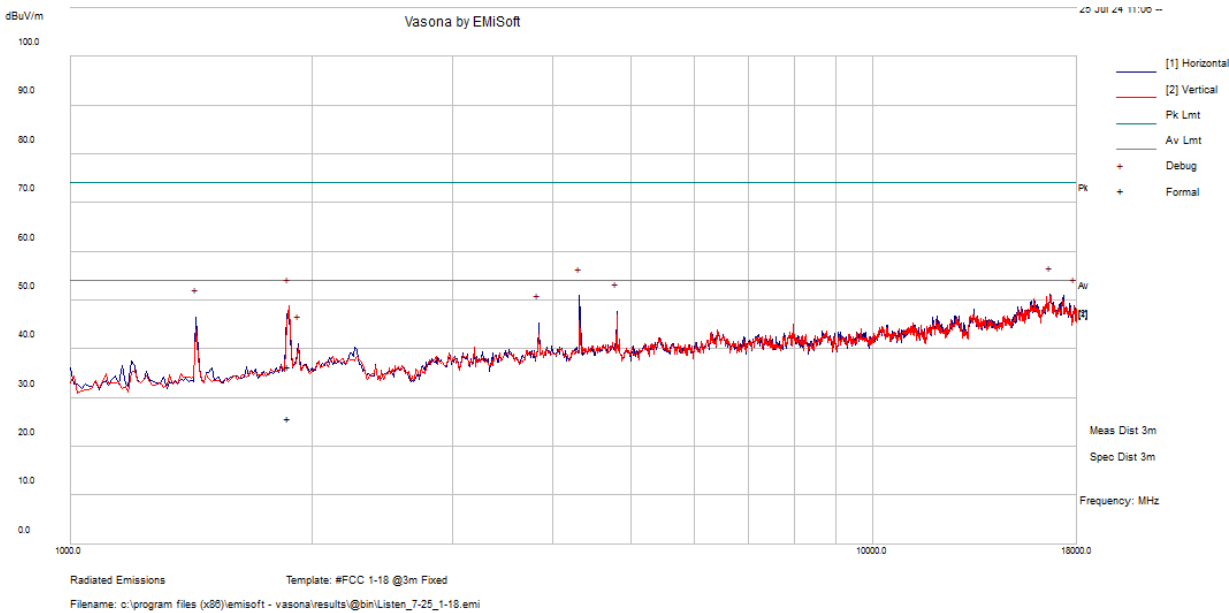
$$\text{dBuV/m} = 20 \cdot \log(\text{V/m}) + 120 = 20 \cdot \log((500 [\text{uV/m}]/1000000)) + 120 = 54 [\text{dBuV/m}]$$

Note 3: Limits at 1 meter are determined by applying a Distance correction factor accounts for extrapolation from 1 meter to 3 meters. Formula used is as follows: $20 \cdot \log(3 \text{ meters} / 1 \text{ meter}) = 9.54$ (According to ANSI C63.10-2013 Section 9.4). Extrapolation calculation from 3m to 1m distance:

$$54 [\text{dBuV/m at 3m}] + 9.54 [\text{dB}] = 63.54 [\text{dBuV/m at 1m}]$$

2) 1 GHz – 18 GHz, Measured at 3 meters

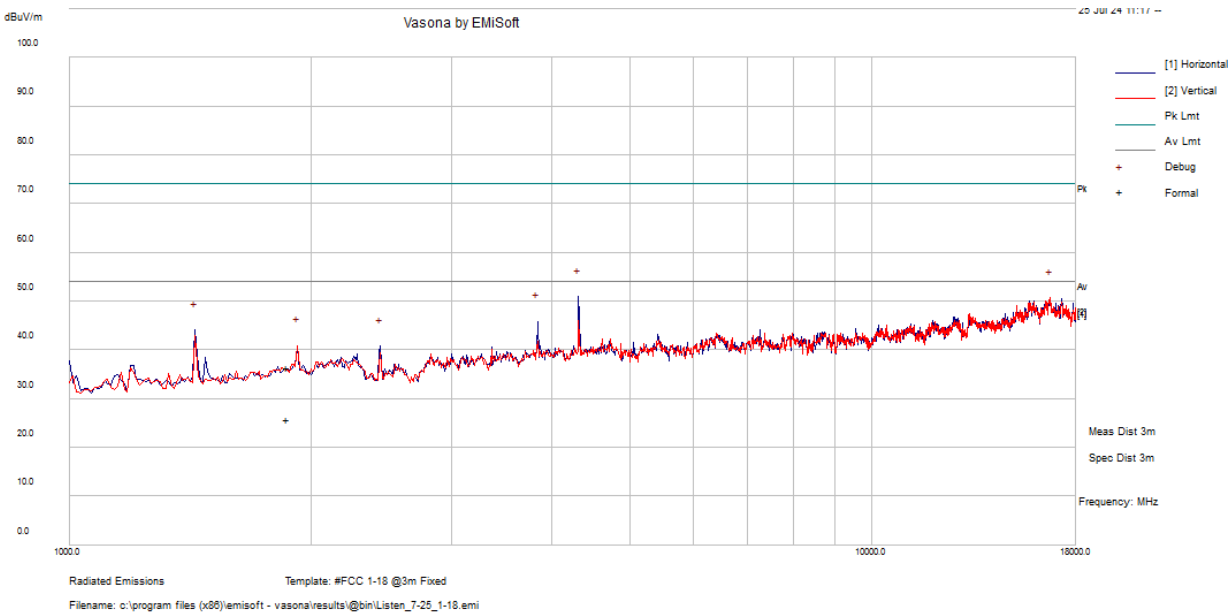
BLE, 2402 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
16671.875	41.21	9.95	51.16	300	H	360	54	-2.84	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit .

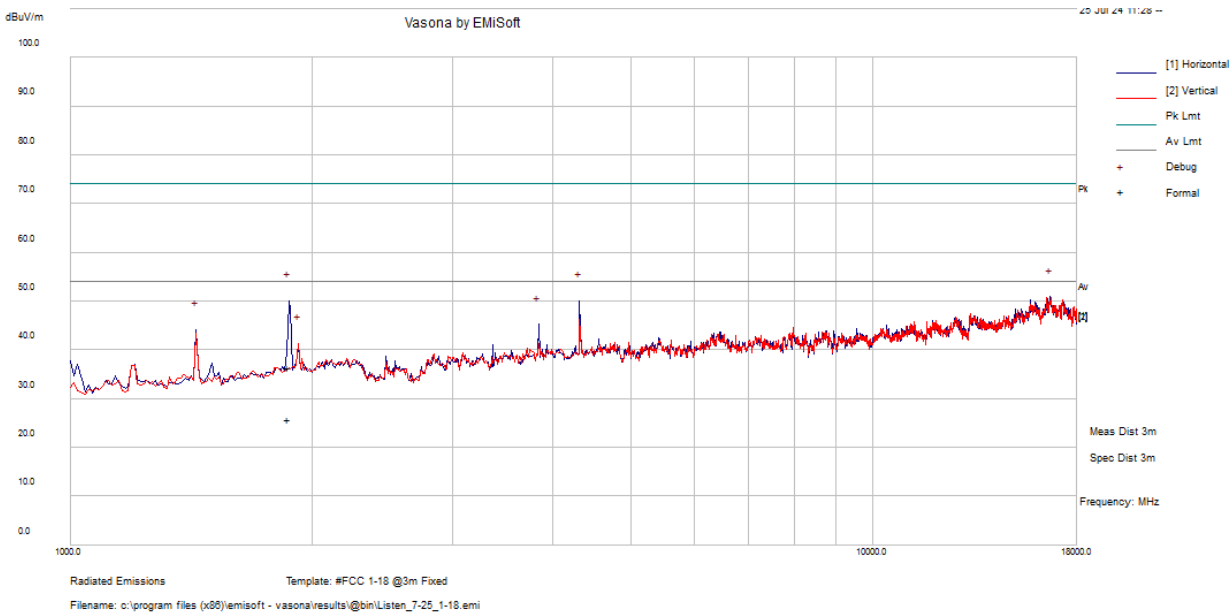
BLE, 2440 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
4315	56.09	-5.24	50.85	100	H	360	54	-3.15	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit.

BLE, 2480 MHz

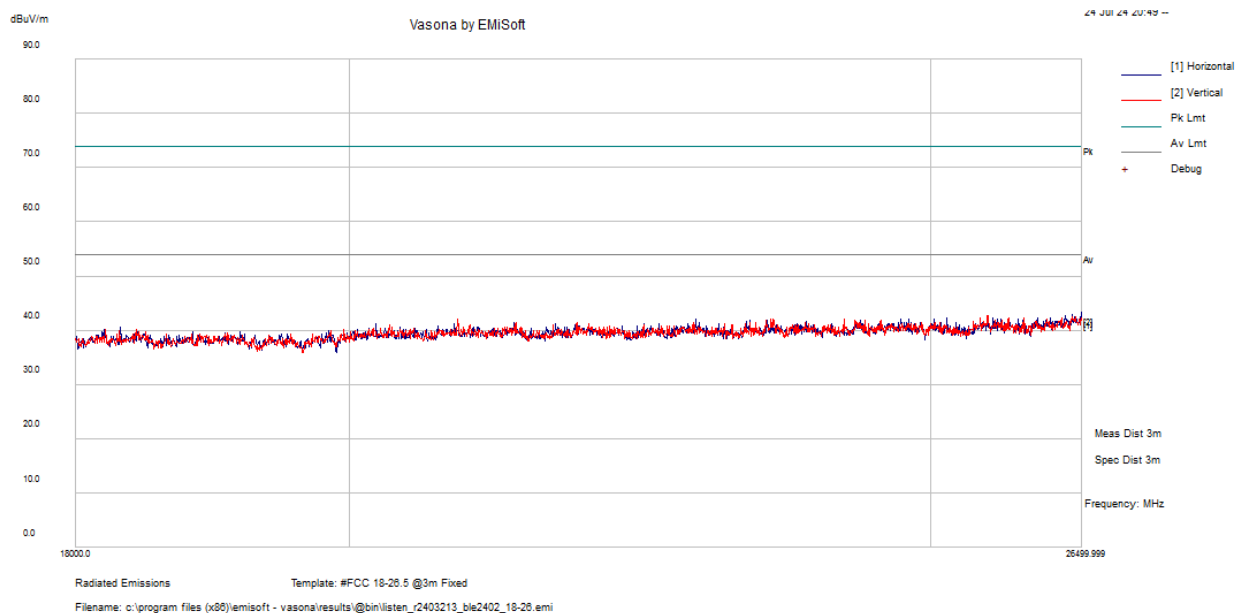


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
16661.25	40.92	9.92	50.84	300	H	360	54	-3.16	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit.

3) 18 GHz – 26.5 GHz, Measured at 3 meters

BLE, 2402 MHz

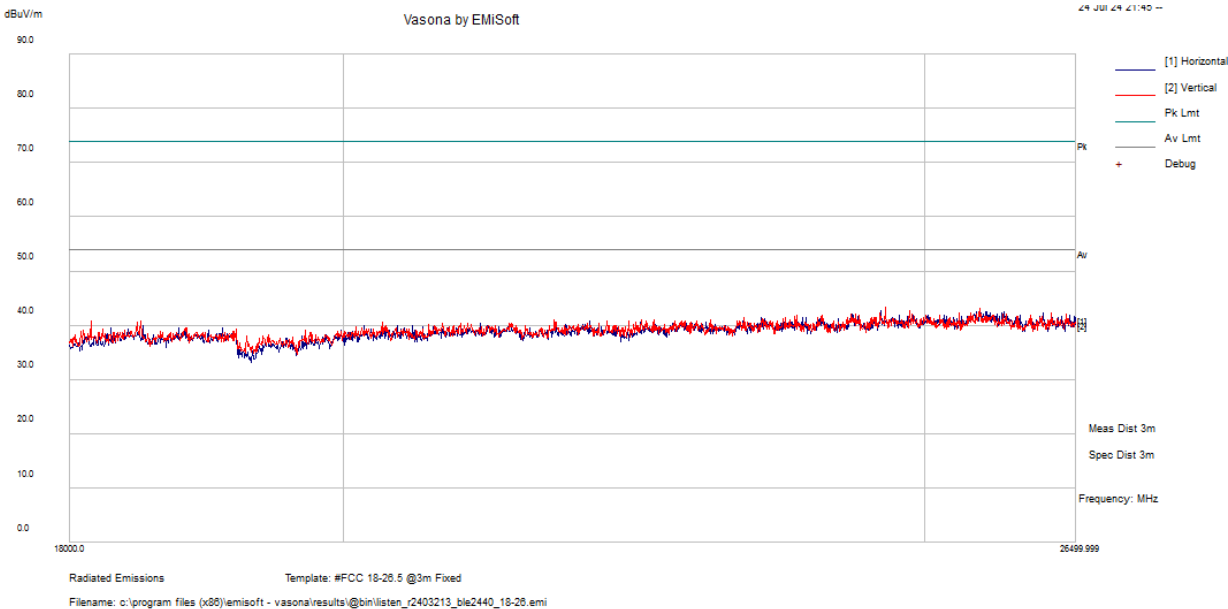


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
25160.002	51.27	-9.54	41.73	199	V	7	54	-12.27	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit.

Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

BLE, 2440 MHz

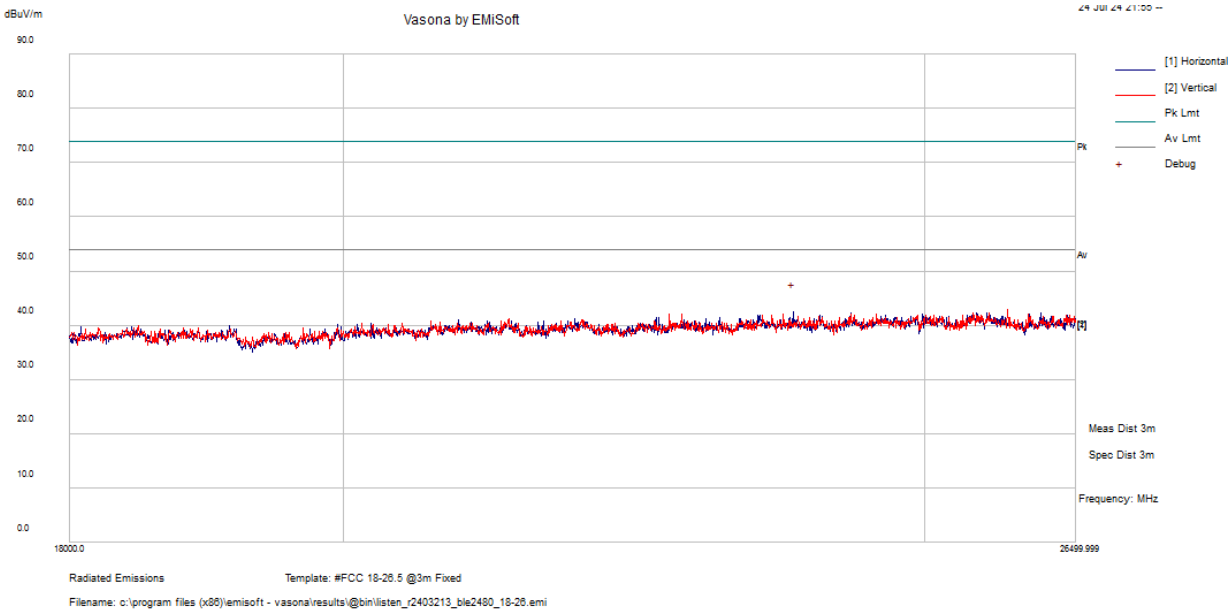


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
25573.626	50.94	-9	41.94	199	V	7	54	-12.06	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit.

Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

BLE, 2480 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
25573.626	50.94	-9	41.94	199	V	7	54	-12.06	Peak

Note: The Peak measurement is used to show compliance, which is evaluated against the Average Limit.
Note: The plot above shows that there were no emissions above the noise floor at 18-26.5GHz frequency range.

Fundamental Emissions Test Result

Frequency (MHz)	S.A. Reading (dBuV)	Turntable Azimuth (degrees)	Test Antenna Height (cm)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m at 3m)	Limit (dBuV/m at 3m)	Margin (dB)
2402	109.221	120	242	-7.4	101.821	114	-12.179
2440	108.193	182	268	-7.1	101.093		-12.907
2480	107.788	125	292	-6.8	100.988		-13.012

Note: 94 dBuV/m at 3meters is a conversion of 50mV/m at 3meters for average requirements. For Peak measurements, +20dB used for limit.

Note: The Vertical polarization is determined to be the worst case.

6 Annex A – Band Edge Measurements

Please refer to the attachment.

7 Appendix A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

8 Appendix B (Normative) – EUT External Photographs

Please refer to the attachment

9 Appendix C (Normative) – EUT Internal Photographs

Please refer to the attachment

10 Appendix D (Normative) – A2LA Electrical Testing Certificate



Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---