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January 24, 2019

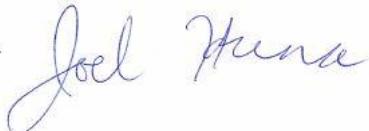
Listen Technologies Corporation
14912 Heritagecrest Way
Bluffdale, UT 84065-4818

Dear Guy Leishman,

Enclosed is the EMC test report for compliance testing of the Listen Technologies Corporation, LKR-11 and LKR-12, tested to the requirements of Title 47 of the CFR, Part 15.225, Subpart C for Certification as an Intentional Radiator.

Thank you for using the services of Eurofins | MET Labs, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
EUROFINS | MET LABS, INC.



Joel Huna
Documentation Department

Reference: (\Listen Technologies Corporation\EMCS100559-FCC225)

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Electromagnetic Compatibility Criteria Test Report

for the

**Listen Technologies Corporation
LKR-11 and LKR-12**

Tested under
the FCC Certification Rules
contained in
15.225 Subpart C
for Intentional Radiators

MET Report: EMCS100559-FCC225

January 24, 2019

Prepared For:

**Listen Technologies Corporation
14912 Heritagecrest Way
Bluffdale, UT 84065-4818**

Prepared By:
Eurofins | MET Labs, Inc.
3162 Belick St.
Santa Clara, CA 95054

Electromagnetic Compatibility Criteria Test Report

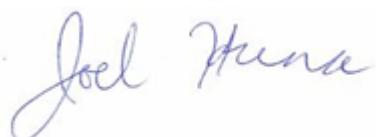
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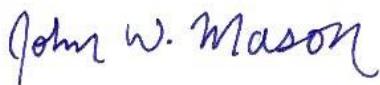


James Borrott, Project Engineer
Electromagnetic Compatibility Lab



Joel Huna
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Part 15.225 under normal use and maintenance.



John Mason,
Director, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	January 24, 2019	Initial Issue.

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List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μH	microhenry
μ	microfarad
μ s	microseconds
NEBS	Network Equipment-Building System
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane



MET Labs

Listen Technologies Corporation
LKR-11 and LKR-12

Electromagnetic Compatibility
Executive Summary
CFR Title 47, Part 15.225

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Listen Technologies Corporation LKR-11 and LKR-12, with the requirements of Part 15, §15.225. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the LKR-11 and LKR-12. Listen Technologies Corporation should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the LKR-11 and LKR-12, has been **permanently** discontinued.

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.225, in accordance with Listen Technologies Corporation, purchase order number 0006309. All tests were conducted using measurement procedure ANSI C63.4-2014.

FCC Reference 47 CFR Part 15.225	Description	Compliance
Part 15 §15.225(d)	Outside-Band Field Strength emissions per 15.209 - 13.110 – 14.010 MHz	Compliant

Table 1. Executive Summary of EMC Part 15.225 Compliance Testing

II. Equipment Configuration

A. Overview

Eurofins | MET Labs, Inc. was contracted by Listen Technologies Corporation to perform testing on the LKR-11 and LKR-12, under Listen Technologies Corporation's purchase order number 0006309.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Listen Technologies Corporation, LKR-11 and LKR-12.

The results obtained relate only to the item(s) tested.

Model(s) Tested:	LKR-11 and LKR-12	
Model(s) Covered:	LKR-11 and LKR-12	
EUT Specifications:	Primary Power: 3.7 VDC Li-Ion Battery	
	FCC ID: OMDLK1-001	
	Type of Modulations:	ASK
	Equipment Code:	DTS
	Peak RF Output Power:	60.3 dB μ V/m at 3m
	EUT Frequency Ranges:	13.56-13.56 MHz
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature: 15-35° C	
	Relative Humidity: 30-60%	
	Barometric Pressure: 860-1060 mbar	
Evaluated by:	James Borrott	
Report Date(s):	January 24, 2019	

Table 2. EUT Summary Table

B. References

CFR 47, Part 15, Subpart C	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
ANSI C63.4:2014	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ISO/IEC 17025:2005	General Requirements for the Competence of Testing and Calibration Laboratories
ANSI C63.10-2013	American National Standard for Testing Unlicensed Wireless Devices

Table 3. References

C. Test Site

All testing was performed at Eurofins | MET Labs, Inc., 3162 Belick St. Santa Clara, CA 95054. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 3 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

Correlation between semi-anechoic chamber and OATS:

Two calibrated Loop antennas were used on an OATS. One antenna was driven by a signal generator with a known power. The receive antenna was initially placed 1m away from the transmit antenna. The two antennas were placed parallel to each other. The receive antenna was in turn connected to a calibrated spectrum analyzer. The emissions were swept from 9 kHz to 30 MHz. The receive antenna was then rotated 90 degrees and measurements re-taken. Additional measurements were taken when the receive antenna was placed at 3meters. This same setup was taken to inside the semi-anechoic chamber and the measurements repeated.

The data was used to correlate the semi-anechoic chamber and OATS.

D. Measurement Uncertainty

Test Method	Typical Expanded Uncertainty	K	Confidence Level
RF Frequencies	±4.52 Hz	2	95%
RF Power Conducted Emissions	±2.32 dB	2	95%
RF Power Conducted Spurious Emissions	±2.25 dB	2	95%
RF Power Radiated Emissions	±3.01 dB	2	95%

Table 4. Uncertainty Calculations Summary

E. Description of Test Sample

The LKR-11 and LKR-12, Equipment Under Test (EUT) is described as the following:

LKR-11 ListenTALK Receiver Pro

The term LKR-11 ListenTALK Receiver Pro refers to a ListenTALK hand-held unit that can be used as a participant unit that can only receive audio from a ListenTALK group. The LKR-11 is a full featured listen only unit.

LKR-12 ListenTALK Receiver Basic

The term LKR-12 Listen TALK Receiver Basic refers to a ListenTALK hand-held unit that can be used as a participant unit that can only receive audio from a ListenTALK group. The LKR-12 is a limited featured listen only unit.

The ListenTALK device is a hand held DECT unit that communicates to other ListenTALK units (one or many) using a headset or internal microphone for the audio. The LK-1 has a PTT button for two way communication. The LKR-11 and LKR-12 do not have a PTT button. Most applications will be for tour groups in a portable setting.

Note: The LK-1 was only used as support equipment.

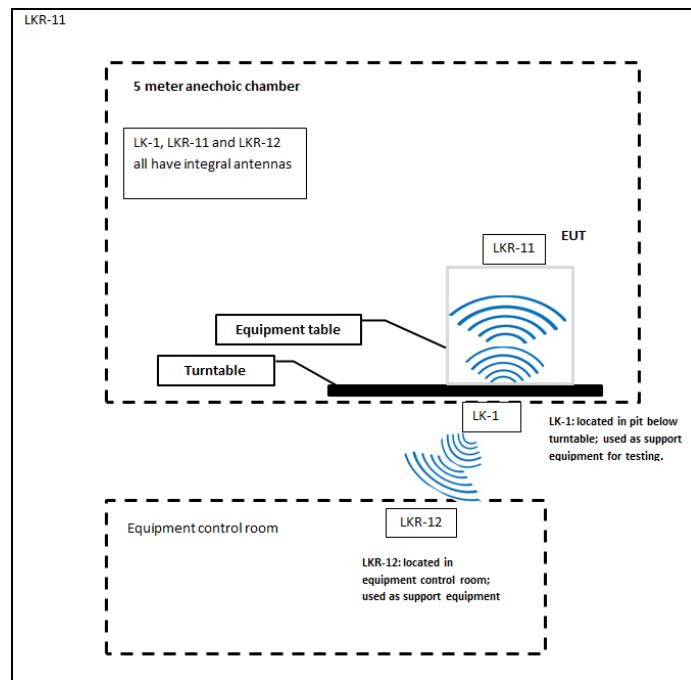


Figure 1. Block Diagram of Test Configuration, LKR-11

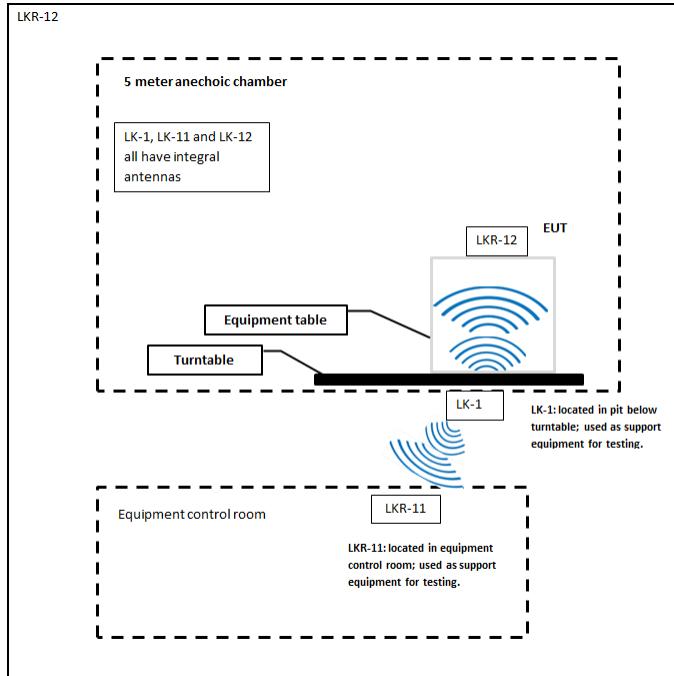


Figure 2. Block Diagram of Test Configuration, LKR-12

F. Equipment Configuration

The EUT was set up as outlined in Figures 1 and 2. All equipment incorporated as part of the EUT is included in the following list.

Ref. ID	Slo t #	Name / Description	Model Number	Part Number	Serial Number	Country
LK-1-A0		ListenTALK LK-1	LK-1-A0	LK-1-A0	D18A7AA0489	USA
LKR-11-A0		ListenTALK LKR-11-A0	LKR-11-A0	LKR-11-A0	E18A0B00021	USA
LKR-12-A0		ListenTALK LKR-12-A0	LKR-12-A0	LKR-12-A0	E18A0B10020	USA
		Headset/Earpiece				

Table 5. Equipment Configuration

G. Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

Ref. ID	Name / Description	Manufacturer	Model Number	*Customer Supplied Calibration Data
LA-482	Docking Station/LA-482	Listen Tech	LA-482	N/A
LA-210	Docking Station PSU	Listen Tech	LA-210	N/A
LPT-A110	USB B cable	Listen Tech	LPT-A110	N/A
LA-422	USB micro cable	Listen Tech	LA-422	N/A

The 'Customer Supplied Calibration Data' column will be marked as either not applicable, not available, or will contain the calibration date supplied by the customer.

Table 6. Support Equipment

H. Ports and Cabling Information

Ref. ID	Port name on EUT	Cable Description or reason for no cable	Qty	Length as tested (m)	Max Length (m)	Shielded? (Y/N)	Termination Box ID & Port Name
1	Headset	Headset earpiece	1	1	1	Yes	Headset
2	USB	4 conductor	1	2	2	Yes	USB with Power
3	Charging & USB (Bottom)	4 Connections	4 Ports	Port	Port connection	No	Charging and USB

Table 7. Ports and Cabling Information

I. Mode of Operation

The ListenTALK units are put in continuous mode for EMC testing.

The ListenTALK LK-1 device has a Leader and Participant mode. The LKR-11 & LKR-12 are Participant units only. In Leader mode the audio is always transmitting unless the MUTE button is pressed. The Leader can transmit to one or many ListenTALK units (LKR-11 & LKR-12).

J. Method of Monitoring EUT Operation

There is an antenna ICON on the display screen of the ListenTALK LK-1 device that will show if a unit is linked to another unit (LK-1, LKR-11, & LKR-12) and at what level of RSSI to each unit.

The connection between the LKR-11 or LKR-12 and the LK-1 support device is monitored by verifying that audio is being transmitted.

K. Modifications

a) Modifications to EUT

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the test standard.

L. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Listen Technologies Corporation upon completion of testing.

III. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.225(d) Spurious Emission Limits, outside the bands 13.110 – 14.010 MHz

Test Requirement(s): 15.225 (d) The field strength of any emissions appearing outside of the 13.110–14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.

Test Procedures: The EUT was set to transmit and placed on a 0.8m-high wooden stand inside a semi-anechoic chamber. The method of testing and test conditions of ANSI C63.4: 2014 were used. For measurements below 30 MHz a loop antenna placed 1m away from the unit was used. For measurements above 30 MHz a biconallog antenna placed 3m away from the unit was used. Measurements were conducted with the loop antenna at coaxial (parallel) and planar (perpendicular) orientations. The Spectrum analyzer RBW was set to 10 kHz and VBW was set to 30 kHz. A peak detector was used below 30 MHz and a Quasi-peak detector was used for measurements for above 30 MHz.

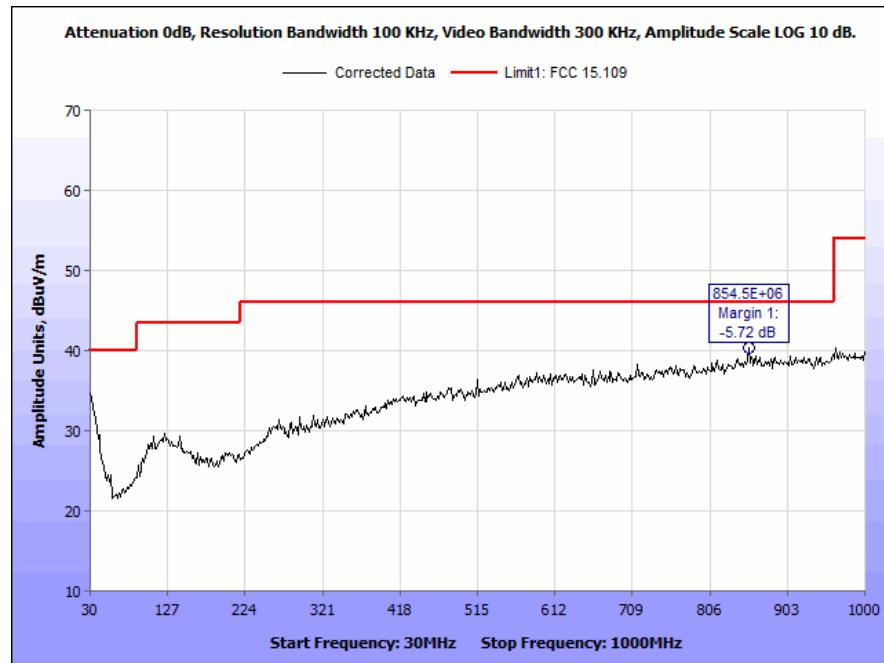
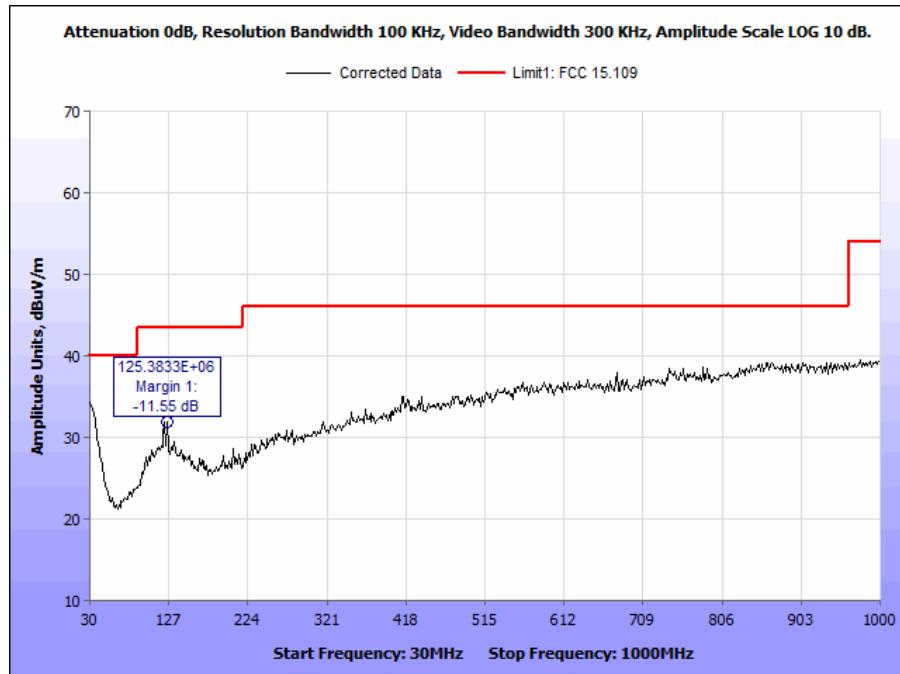
The measurements made at 1m with the loop antenna were then extrapolated to 30m using the following correction factor.

$$40\log(1/30) = -59.1 \text{ dB}$$

Test Results: The EUT was compliant with requirements of **§ 15.225 (d)**.

Test Engineer: James Borrott

Test Date: September 14, 2018


Plot 1. Radiated Emissions, 30 MHz – 1000 MHz, LKR-11

Plot 2. Radiated Emissions, 30 MHz – 1000 MHz, LKR-12

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2005.

Asset#	Description	Manufacturer	Model	Last Cal	Next Cal
1S2600	Bilog Antenna	Teseq	CBL6112D	11/28/2016	11/28/2018
1S2482	5 Meter Chamber (NSA)	Panashield	5 Meter Semi-Anechoic Chamber	See Note	
1S2399	Turntable Controller	SUNOL SCIENCE	SC99V	See Note	
1S3962	Spectrum Analyzer (PSA)	Keysight/Agilent	E4448A	4/25/2018	4/25/2019
1S4070	Digital Barometer	Control Co	6530	6/22/2018	6/22/2020

Table 8. Test Equipment List

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.



MET Labs

Listen Technologies Corporation
LKR-11 and LKR-12

Electromagnetic Compatibility
Certification & User's Manual Information
CFR Title 47, Part 15.225

V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of emitting radio-frequency energy by radiation, conduction, or other means. Radio-frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing;*
 - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
 - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer,* be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
 - (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
 - (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
 - (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
 - (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

(a) *In addition to the requirements in Part 2 of this chapter, a device subject to certification or verification shall be labeled as follows:*

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

- (4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified under paragraph (a) of this section is required to be affixed only to the main control unit.

- (5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

§ 15.21 Information to user.

The user's manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.



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Electromagnetic Compatibility
End of Report
CFR Title 47, Part 15.225

End of Report