



## FCC 47 CFR PART 15 SUBPART C

### TEST REPORT

For

**BT KEYBOARD**

**Model: BT-540**

**Trade Name: ZIPPY**

*Issued to*

**ZIPPY TECHNOLOGY CORP.**  
**10F, No. 50, Min Chyuan Rd., Shin-Tien City,**  
**Taipei Hsien, Taiwan, R.O.C.**

*Issued by*

**Compliance Certification Services Inc.**  
**No. 11, Wu-Gong 6<sup>th</sup> Rd., Wugu Industrial Park,**  
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## TABLE OF CONTENTS

<b>1. TEST RESULT CERTIFICATION.....</b>	<b>3</b>
<b>2. EUT DESCRIPTION .....</b>	<b>4</b>
<b>3. TEST METHODOLOGY .....</b>	<b>5</b>
3.1 EUT CONFIGURATION .....	5
3.2 EUT EXERCISE.....	5
3.3 GENERAL TEST PROCEDURES.....	5
3.4 FCC PART 15.205 RESTRICTED BANDS OF OPERATIONS .....	6
3.5 DESCRIPTION OF TEST MODES .....	7
<b>4. INSTRUMENT CALIBRATION.....</b>	<b>8</b>
4.1 MEASURING INSTRUMENT CALIBRATION .....	8
4.2 MEASUREMENT EQUIPMENT USED .....	8
4.3 MEASUREMENT UNCERTAINTY .....	9
<b>5. FACILITIES AND ACCREDITATIONS .....</b>	<b>10</b>
5.1 FACILITIES .....	10
5.2 EQUIPMENT.....	10
5.3 TABLE OF ACCREDITATIONS AND LISTINGS.....	11
<b>6. SETUP OF EQUIPMENT UNDER TEST .....</b>	<b>12</b>
6.1 SETUP CONFIGURATION OF EUT.....	12
6.2 SUPPORT EQUIPMENT .....	12
<b>7. FCC PART 15.247 REQUIREMENTS.....</b>	<b>13</b>
7.1 20 DB BANDWIDTH.....	13
7.2 PEAK POWER.....	16
7.3 AVERAGE POWER .....	17
7.4 BAND EDGES MEASUREMENT .....	18
7.5 FREQUENCY SEPARATION.....	23
7.6 NUMBER OF HOPPING FREQUENCY.....	25
7.7 TIME OF OCCUPANCY (DWELL TIME) .....	27
7.8 SPURIOUS EMISSIONS .....	34
7.9 POWERLINE CONDUCTED EMISSIONS.....	45
<b>APPENDIX I RADIO FREQUENCY EXPOSURE.....</b>	<b>46</b>
<b>APPENDIX II PHOTOGRAPHS OF TEST SETUP .....</b>	<b>47</b>
<b>APPENDIX 1 - PHOTOGRAPHS OF EUT</b>	



## 1. TEST RESULT CERTIFICATION

**Applicant:** ZIPPY TECHNOLOGY CORP.  
10F, No. 50, Min Chyuan Rd., Shin-Tien City,  
Taipei Hsien, Taiwan, R.O.C.

**Equipment Under Test:** BT KEYBOARD

**Trade Name:** ZIPPY

**Model:** BT-540

**Date of Test:** July 7 ~ 16, 2010

APPLICABLE STANDARDS	
STANDARD	TEST RESULT
FCC 47 CFR Part 15 Subpart C	No non-compliance noted

### We hereby certify that:

The above equipment was tested by Compliance Certification Services Inc. The test data, data evaluation, test procedures, and equipment configurations shown in this report were made in accordance with the procedures given in **ANSI C63.4: 2003** and the energy emitted by the sample EUT tested as described in this report is in compliance with the requirements of FCC Rules Part 15.207, 15.209, 15.247.

The test results of this report relate only to the tested sample EUT identified in this report.

*Approved by:*

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Rex Lai  
Section Manager  
Compliance Certification Services Inc.

*Reviewed by:*

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Gina Lo  
Section Manager  
Compliance Certification Services Inc.



## 2. EUT DESCRIPTION

<b>Product</b>	BT KEYBOARD
<b>Trade Name</b>	ZIPPY
<b>Model Number</b>	BT-540
<b>Model Discrepancy</b>	N/A
<b>Power Supply</b>	Powered by AAA batteries × 2 (DC: 3V)
<b>Frequency Range</b>	2402 ~ 2480 MHz
<b>Transmit Power</b>	1.09 dBm
<b>Modulation Technique</b>	FHSS (GFSK)
<b>Transmit Data Rate</b>	1Mbps
<b>Number of Channels</b>	79 Channels
<b>Antenna Specification</b>	Gain: 0.05 dBi
<b>Antenna Designation</b>	PCB Antenna

**Remark:**

1. *The sample selected for test was production product and was provided by manufacturer.*
2. *This submittal(s) (test report) is intended for FCC ID: P4PBT540 filing to comply with Section 15.207, 15.209 and 15.247 of the FCC Part 15, Subpart C Rules..*



### **3. TEST METHODOLOGY**

The tests documented in this report were performed in accordance with ANSI C63.4: 2003 and FCC CFR 47 Part 15.207, 15.209 and 15.247.

#### **3.1 EUT CONFIGURATION**

The EUT configuration for testing is installed on RF field strength measurement to meet the Commissions requirement and operating in a manner that intends to maximize its emission characteristics in a continuous normal application.

#### **3.2 EUT EXERCISE**

The EUT was operated in the engineering mode to fix the TX frequency that was for the purpose of the measurements.

According to its specifications, the EUT must comply with the requirements of the Section 15.207, 15.209 and 15.247 under the FCC Rules Part 15 Subpart C.

#### **3.3 GENERAL TEST PROCEDURES**

##### **Conducted Emissions**

The EUT is placed on the turntable, which is 0.8 m above ground plane. According to the requirements in Section 13.1.4.1 of ANSI C63.4: 2003 Conducted emissions from the EUT measured in the frequency range between 0.15 MHz and 30MHz using CISPR Quasi-peak and average detector modes.

##### **Radiated Emissions**

The EUT is placed on a turn table, which is 0.8 m above ground plane. The turntable shall rotate 360 degrees to determine the position of maximum emission level. EUT is set 3m away from the receiving antenna, which varied from 1m to 4m to find out the highest emission. And also, each emission was to be maximized by changing the polarization of receiving antenna both horizontal and vertical. In order to find out the maximum emissions, exploratory radiated emission measurements were made according to the requirements in Section 13.1.4.1 of ANSI C63.4: 2003.

**3.4 FCC PART 15.205 RESTRICTED BANDS OF OPERATIONS**

(a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

<b>MHz</b>	<b>MHz</b>	<b>MHz</b>	<b>GHz</b>
0.090 - 0.110	16.42 - 16.423	399.9 - 410	4.5 - 5.15
<sup>1</sup> 0.495 - 0.505	16.69475 - 16.69525	608 - 614	5.35 - 5.46
2.1735 - 2.1905	16.80425 - 16.80475	960 - 1240	7.25 - 7.75
4.125 - 4.128	25.5 - 25.67	1300 - 1427	8.025 - 8.5
4.17725 - 4.17775	37.5 - 38.25	1435 - 1626.5	9.0 - 9.2
4.20725 - 4.20775	73 - 74.6	1645.5 - 1646.5	9.3 - 9.5
6.215 - 6.218	74.8 - 75.2	1660 - 1710	10.6 - 12.7
6.26775 - 6.26825	108 - 121.94	1718.8 - 1722.2	13.25 - 13.4
6.31175 - 6.31225	123 - 138	2200 - 2300	14.47 - 14.5
8.291 - 8.294	149.9 - 150.05	2310 - 2390	15.35 - 16.2
8.362 - 8.366	156.52475 -	2483.5 - 2500	17.7 - 21.4
8.37625 - 8.38675	156.52525	2655 - 2900	22.01 - 23.12
8.41425 - 8.41475	156.7 - 156.9	3260 - 3267	23.6 - 24.0
12.29 - 12.293	162.0125 - 167.17	3332 - 3339	31.2 - 31.8
12.51975 - 12.52025	167.72 - 173.2	3345.8 - 3358	36.43 - 36.5
12.57675 - 12.57725	240 - 285	3600 - 4400	( <sup>2</sup> )
13.36 - 13.41	322 - 335.4		

<sup>1</sup> Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz.

<sup>2</sup> Above 38.6

(b) Except as provided in paragraphs (d) and (e), the field strength of emissions appearing within these frequency bands shall not exceed the limits shown in Section 15.209. At frequencies equal to or less than 1000 MHz, compliance with the limits in Section 15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1000 MHz, compliance with the emission limits in Section 15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in Section 15.35 apply to these measurements.



### **3.5 DESCRIPTION OF TEST MODES**

The EUT (model: BT-540) had been tested under operating condition.

Test program used to control the EUT for staying in continuous transmitting mode was programmed.

Software used to control the EUT for staying in continuous transmitting mode was programmed.

After verification, all tests were carried out with the worst case test modes as shown below except radiated spurious emission below 1GHz, which worst case was in normal link mode only.

Channel Low (2402MHz), Mid (2441MHz) and High (2480MHz) with 1Mbps data rate was chosen for full testing.



## 4. INSTRUMENT CALIBRATION

### 4.1 MEASURING INSTRUMENT CALIBRATION

The measuring equipment, which was utilized in performing the tests documented herein, has been calibrated in accordance with the manufacturer's recommendations for utilizing calibration equipment, which is traceable to recognized national standards.

### 4.2 MEASUREMENT EQUIPMENT USED

#### Equipment Used for Emissions Measurement

*Remark: Each piece of equipment is scheduled for calibration once a year and Loop Antenna is scheduled for calibration once three years.*

Conducted Emissions Test Site				
Name of Equipment	Manufacturer	Model	Serial Number	Calibration Due
Spectrum Analyzer	Agilent	E4446A	MY43360131	03/03/2011
Power Meter	Agilent	E4416A	GB41291611	06/27/2011
Power Sensor	Agilent	E9327A	US40441097	06/27/2011

3M Semi Anechoic Chamber				
Name of Equipment	Manufacturer	Model	Serial Number	Calibration Due
Spectrum Analyzer	Agilent	E4446A	US42510252	10/26/2010
EMI Test Receiver	R&S	ESCI	100064	02/04/2011
Pre-Amplifier	Mini-Circuits	ZFL-1000LN	SF350700823	01/13/2011
Pre-Amplifier	MITEQ	AFS44-00102650-42-10P-44	1415367	11/20/2010
Bilog Antenna	Sunol Sciences	JB3	A030105	09/11/2010
Horn Antenna	EMCO	3117	00055165	12/07/2010
Loop Antenna	EMCO	6502	8905/2356	06/10/2013
Turn Table	CCS	CC-T-1F	N/A	N.C.R
Antenna Tower	CCS	CC-A-1F	N/A	N.C.R
Controller	CCS	CC-C-1F	N/A	N.C.R
Site NSA	CCS	N/A	N/A	12/31/2010
Test S/W	EZ-EMC (CCS-3A1RE)			



### 4.3 MEASUREMENT UNCERTAINTY

PARAMETER	UNCERTAINTY
3M Semi Anechoic Chamber / 30M~200M	+/- 4.0606
3M Semi Anechoic Chamber / 200M~1000M	+/- 3.9979
3M Semi Anechoic Chamber / 1G~8G	+/- 2.5790
3M Semi Anechoic Chamber / 8G~18G	+/- 2.5928
3M Semi Anechoic Chamber / 18G~26G	+/- 2.7212
3M Semi Anechoic Chamber / 26G~40G	+/- 2.9520

**Remark:** This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of  $k=2$ .



## **5. FACILITIES AND ACCREDITATIONS**

### **5.1 FACILITIES**

All measurement facilities used to collect the measurement data are located at

No.199, Chunghsen Road, Hsintien City, Taipei Hsien, Taiwan, R.O.C.

Tel: 886-2-2217-0894 / Fax: 886-2-2217-1029

No.11, Wugong 6th Rd., Wugu Industrial Park, Taipei Hsien 248, Taiwan

Tel: 886-2-2299-9720 / Fax: 886-2-2298-4045

No.81-1, Lane 210, Bade 2nd Rd., Luchu Hsiang, Taoyuan Hsien 338, Taiwan

Tel: 886-3-324-0332 / Fax: 886-3-324-5235

The sites are constructed in conformance with the requirements of ANSI C63.7, ANSI C63.4 and CISPR Publication 22.

### **5.2 EQUIPMENT**

Radiated emissions are measured with one or more of the following types of linearly polarized antennas: tuned dipole, biconical, log periodic, bi-log, and/or ridged waveguide, horn. Spectrum analyzers with pre-selectors and quasi-peak detectors are used to perform radiated measurements.

Conducted emissions are measured with Line Impedance Stabilization Networks and EMI Test Receivers.

Calibrated wideband preamplifiers, coaxial cables, and coaxial attenuators are also used for making measurements.

All receiving equipment conforms to CISPR Publication 16-1, "Radio Interference Measuring Apparatus and Measurement Methods."

**5.3 TABLE OF ACCREDITATIONS AND LISTINGS**

Country	Agency	Scope of Accreditation	Logo
USA	FCC	3M Semi Anechoic Chamber (FCC MRA: TW1039) to perform FCC Part 15 measurements	 FCC MRA: TW1039
Taiwan	TAF	LP0002, RTTE01, FCC Method-47 CFR Part 15 Subpart C, D, E, RSS-210, RSS-310 IDA TS SRD, AS/NZS 4268, AS/NZS 4771, TS 12.1 & 12.2, ETSI EN 300 440-1, ETSI EN 300 440-2, ETSI EN 300 328, ETSI EN 300 220-1, ETSI EN 300 220-2, ETSI EN 301 893, ETSI EN 301 489-1/3/7/17 FCC OET Bulletin 65 + Supplement C, EN 50360, EN 50361, EN 50371, RSS 102, EN 50383, EN 50385, EN 50392, IEC 62209, CNS 14958-1, CNS 14959 FCC Method -47 CFR Part 15 Subpart B IEC / EN 61000-3-2, IEC / EN 61000-3-3, IEC / EN 61000-4-2/3/4/5/6/8/11	 Testing Laboratory 1309
Canada	Industry Canada	3M Semi Anechoic Chamber (IC 2324G-1 / IC 2324G-2) to perform	 IC 2324G-1 IC 2324G-2

*\* No part of this report may be used to claim or imply product endorsement by A2LA or any agency of the US Government.*



## 6. SETUP OF EQUIPMENT UNDER TEST

### 6.1 SETUP CONFIGURATION OF EUT

See test photographs attached in Appendix II for the actual connections between EUT and support equipment.

### 6.2 SUPPORT EQUIPMENT

No.	Device Type	Brand	Model	Series No.	FCC ID	Data Cable	Power Cord
1	Notebook PC	DELL	PP19L	GK102 A00	QDS-BRCM1021	N/A	AC I/P: Unshielded, 1.8m DC O/P: Unshielded, 1.8m with a core
2	Notebook PC	IBM	2672 (X31)	99PBTKB	FCC DoC	N/A	AC I/P: Unshielded, 1.8m DC O/P: Unshielded, 1.8m with a core
3	Test Kit	N/A	N/A	N/A	N/A	N/A	N/A
4.	Bluetooth Tester (Remote)	Anritsu	MT8852B	750013	N/A	N/A	Unshielded, 1.8m

**Remark:**

1. *All the equipment/cables were placed in the worst-case configuration to maximize the emission during the test.*
2. *Grounding was established in accordance with the manufacturer's requirements and conditions for the intended use.*



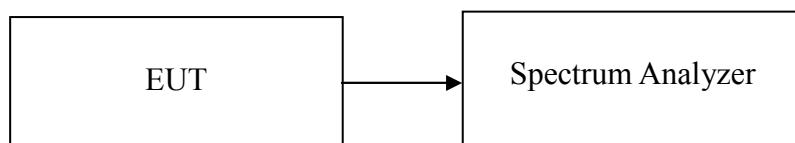
## **7. FCC PART 15.247 REQUIREMENTS**

### **7.1 20 DB BANDWIDTH**

#### **LIMIT**

None; for reporting purposes only.

#### **Test Configuration**



#### **TEST PROCEDURE**

1. Place the EUT on the table and set it in the transmitting mode.
2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the spectrum analyzer.
3. Set the spectrum analyzer as RBW=10kHz, VBW = 30kHz, Span = 2MHz, Sweep = auto.
4. Mark the peak frequency and 20dB (upper and lower) frequency.
5. Repeat until all the rest channels are investigated.

#### **TEST RESULTS**

*No non-compliance noted.*

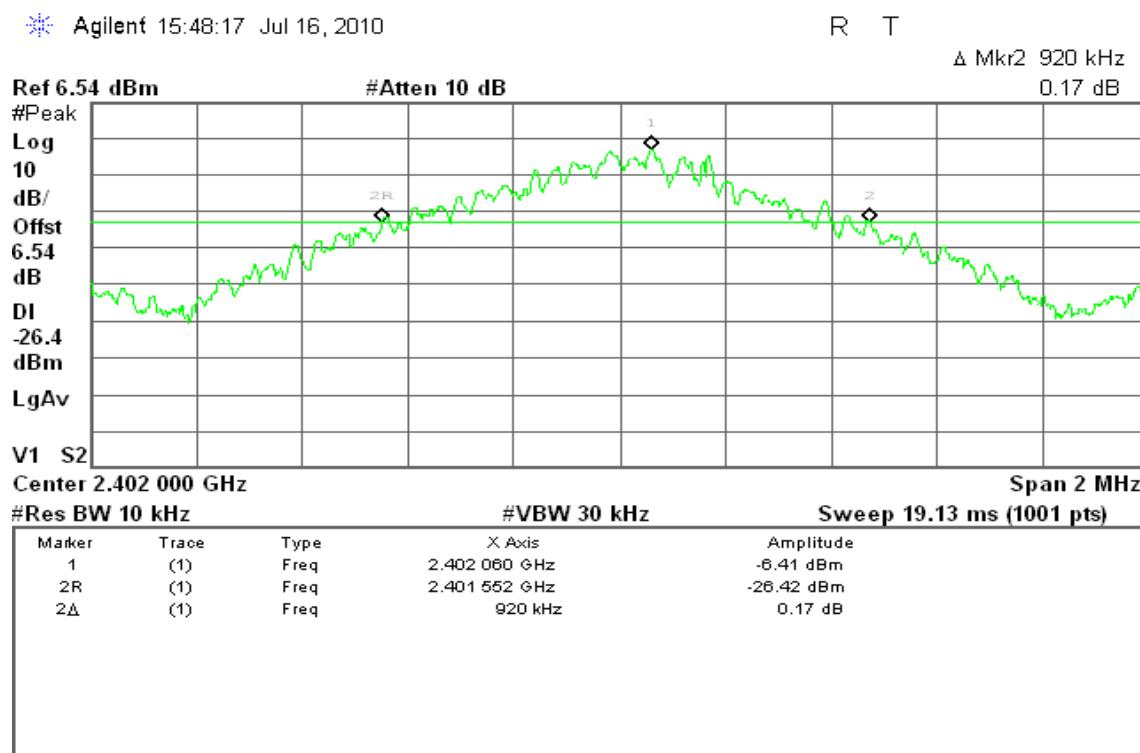
#### **Test Data**

Channel	Frequency (MHz)	20dB Bandwidth (kHz)
Low	2402	920
Mid	2441	924
High	2480	922

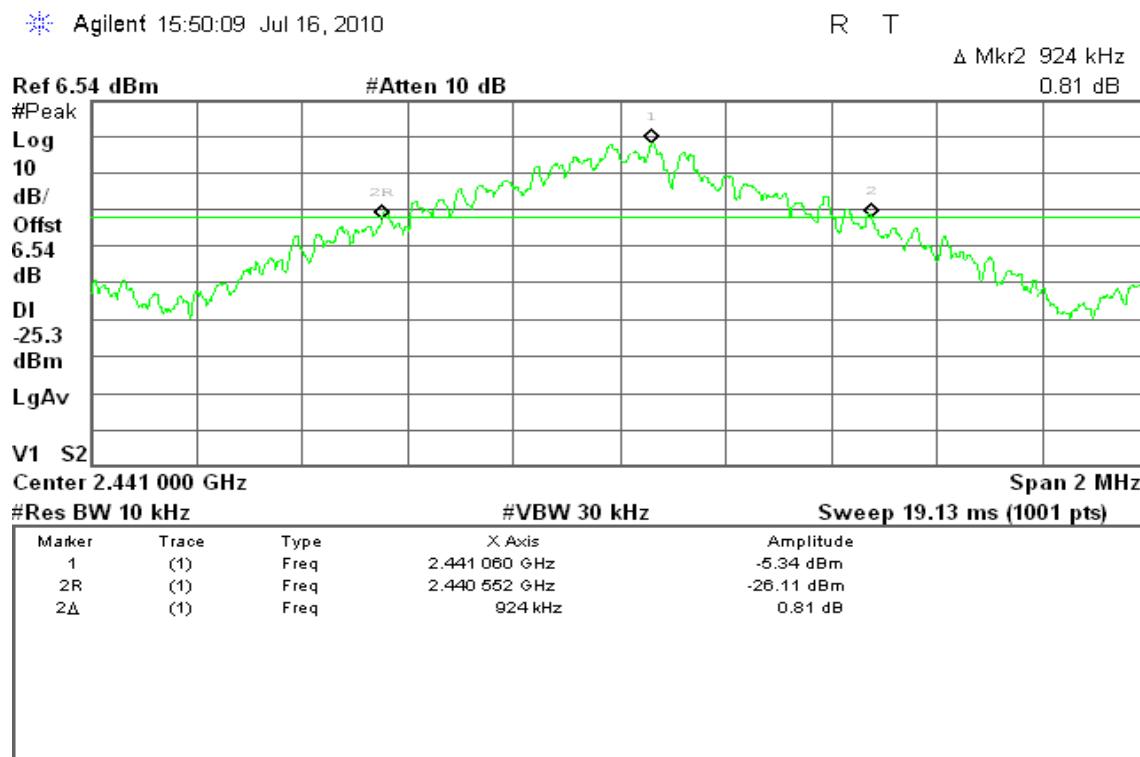


## Test Plot

### 20dB Bandwidth (CH Low)



### 20dB Bandwidth (CH Mid)



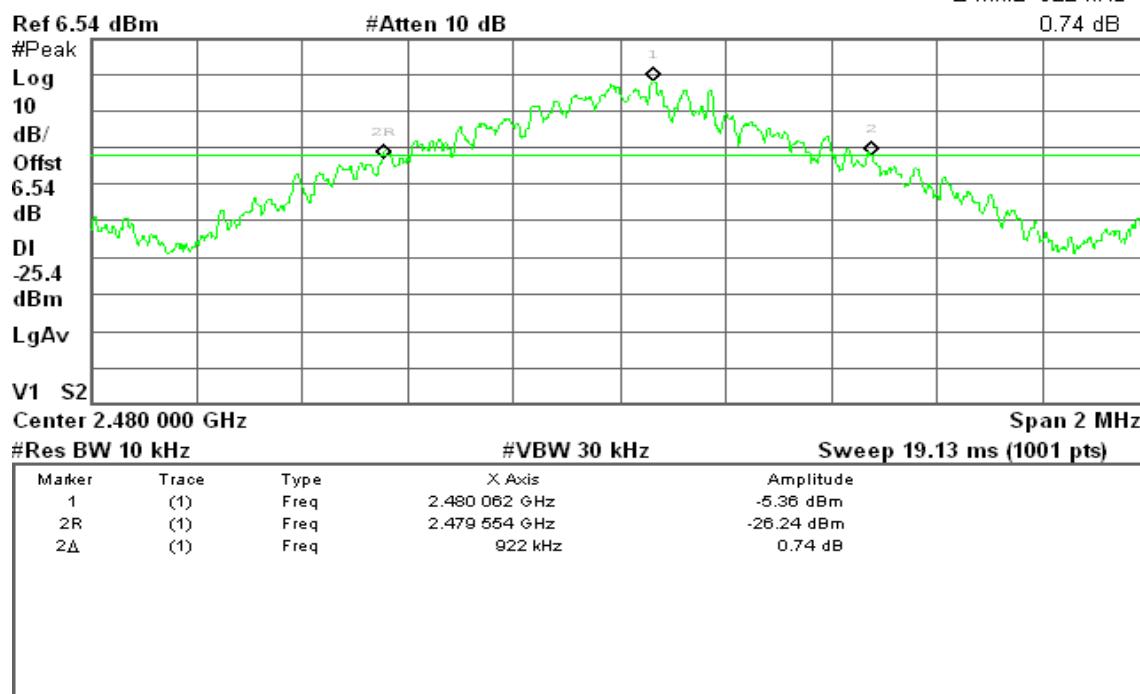
**20dB Bandwidth (CH High)**

Agilent 15:54:32 Jul 16, 2010

R T

Δ Mkr2 922 kHz

0.74 dB





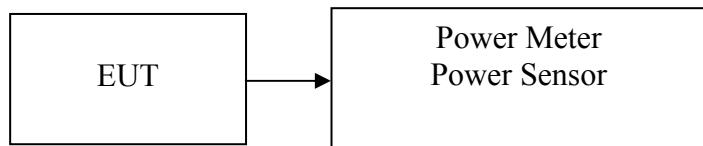
## 7.2 PEAK POWER

### LIMIT

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

1. According to §15.247(a)(1), Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW.
2. According to §15.247(b)(3), for systems using digital modulation in the bands of 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz: 1 Watt.
3. According to §15.247(b)(4), the conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

### Test Configuration



## TEST PROCEDURE

The transmitter output is connected to the Power Meter. The Power Meter is set to the peak power detection.

## TEST RESULTS

*No non-compliance noted.*

### Test Data

Channel	Frequency (MHz)	Output Power (dBm)	Output Power (W)	Limit (W)	Result
Low	2402	1.09	0.0013	1	PASS
Mid	2441	1.03	0.0013		PASS
High	2480	0.49	0.0011		PASS

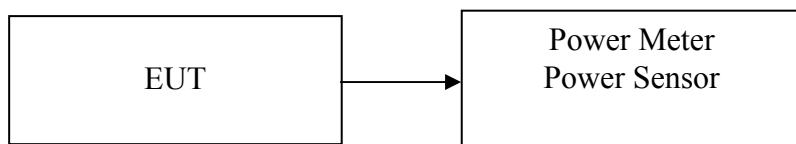


## 7.3 AVERAGE POWER

### LIMIT

None; for reporting purposes only.

### Test Configuration



### TEST PROCEDURE

The transmitter output is connected to the Power Meter. The Power Meter is set to the peak power detection.

### TEST RESULTS

*No non-compliance noted.*

### Test Data

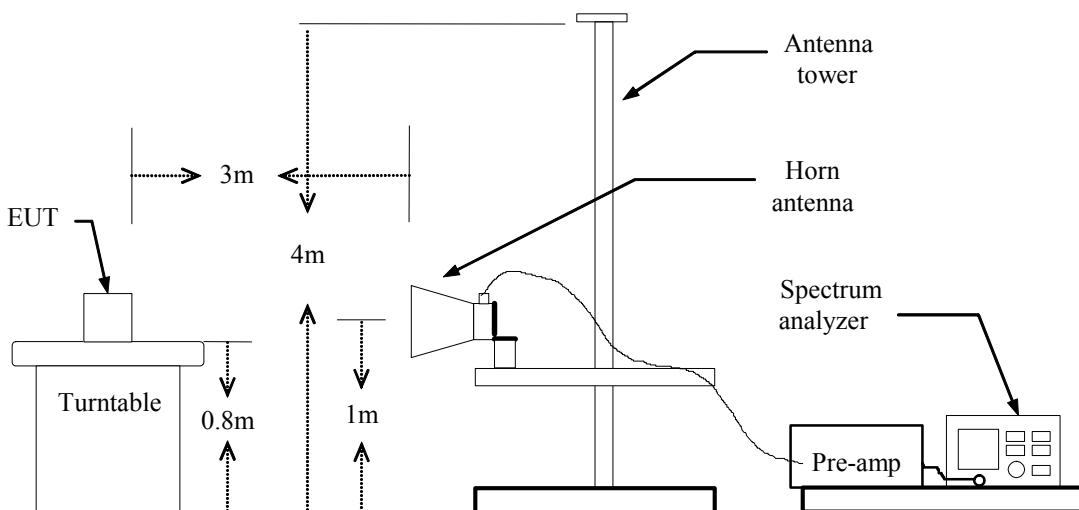
Channel	Frequency (MHz)	Output Power (dBm)	Output Power (W)
Low	2402	-0.81	0.0008
Mid	2441	-0.62	0.0009
High	2480	-1.37	0.0007

## 7.4 BAND EDGES MEASUREMENT

### LIMIT

According to §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in 15.209(a) (see Section 15.205(c)).

### Test Configuration

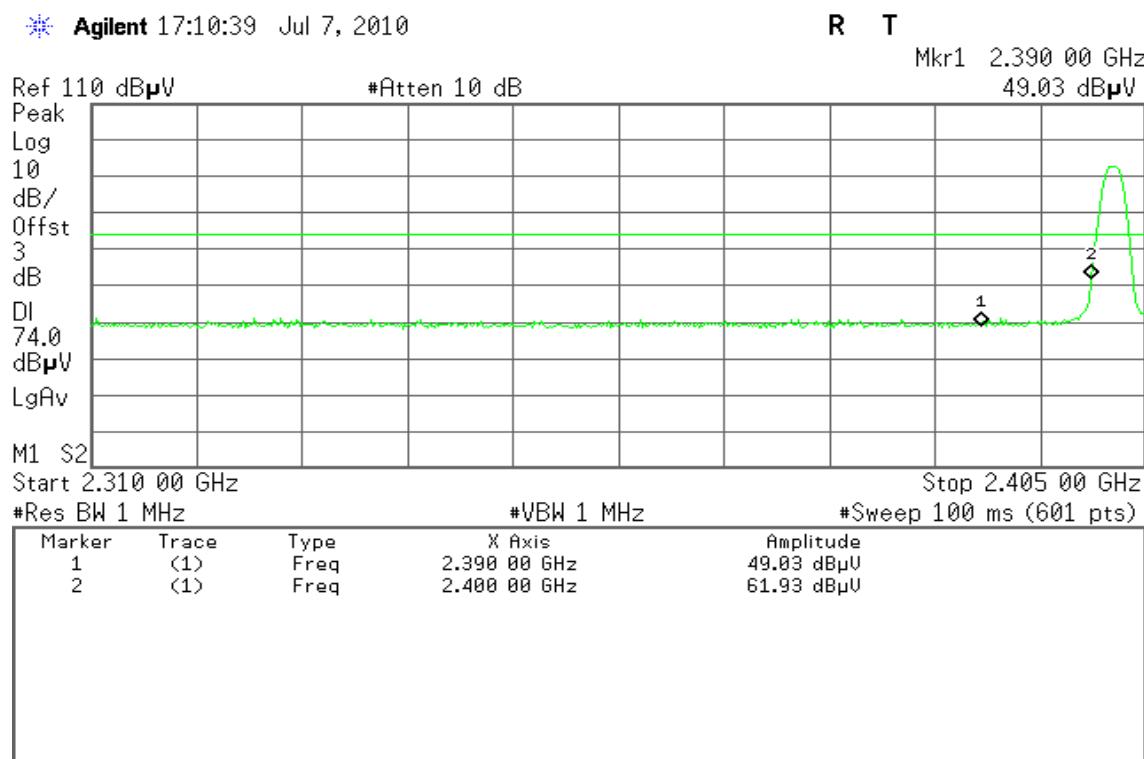
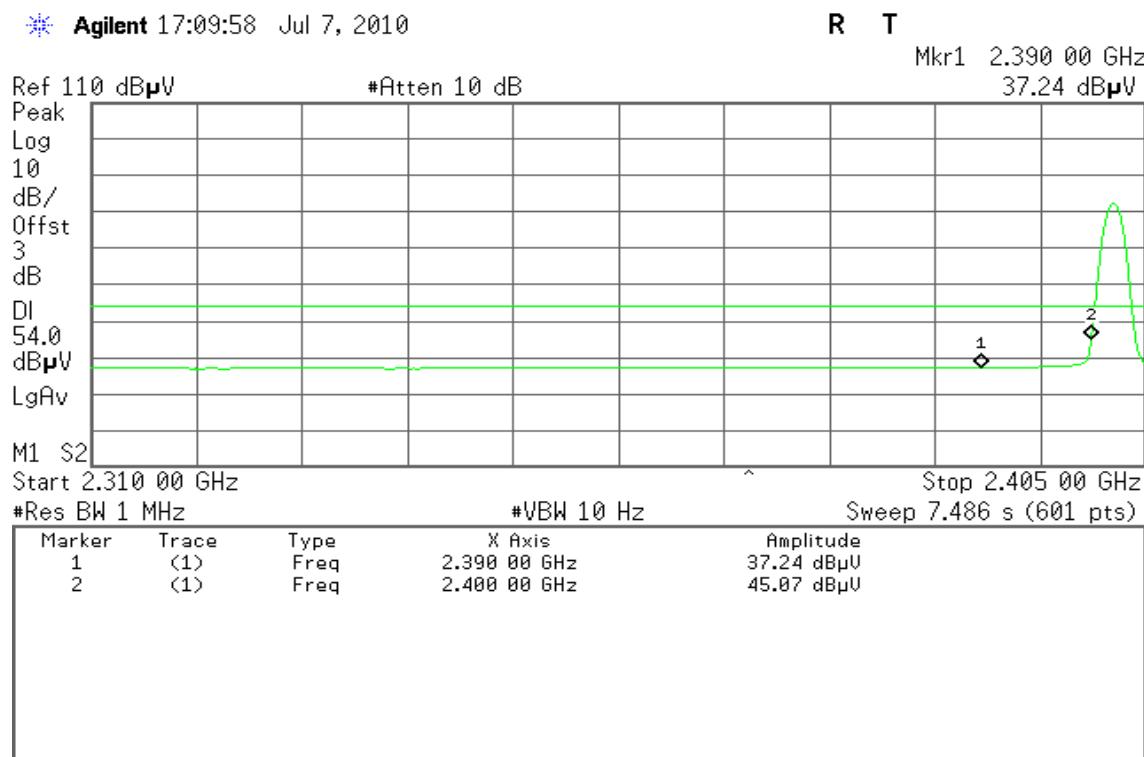


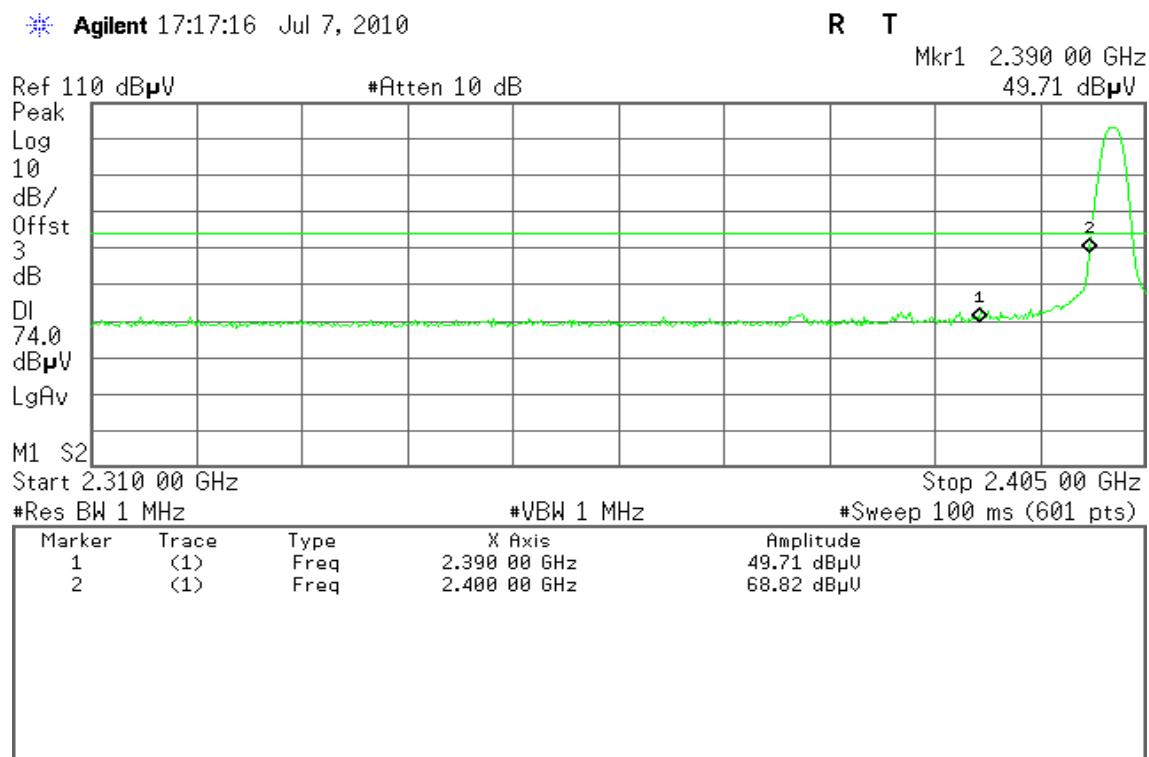
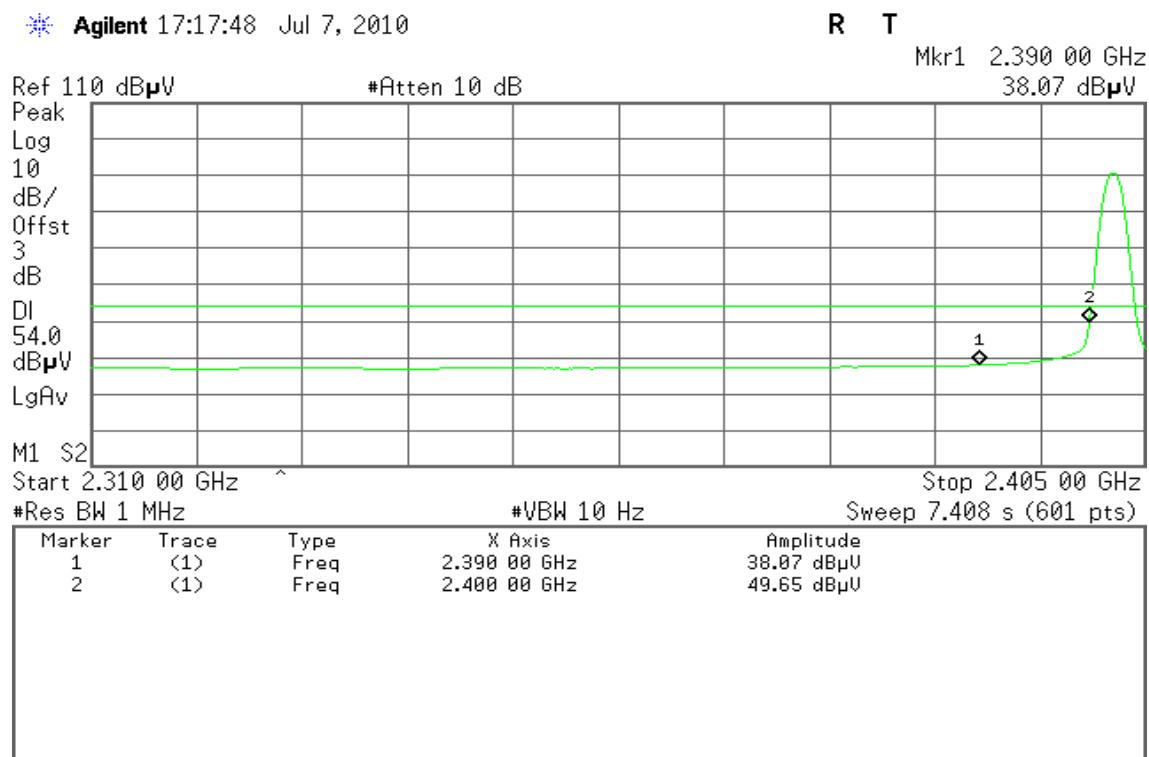
### TEST PROCEDURE

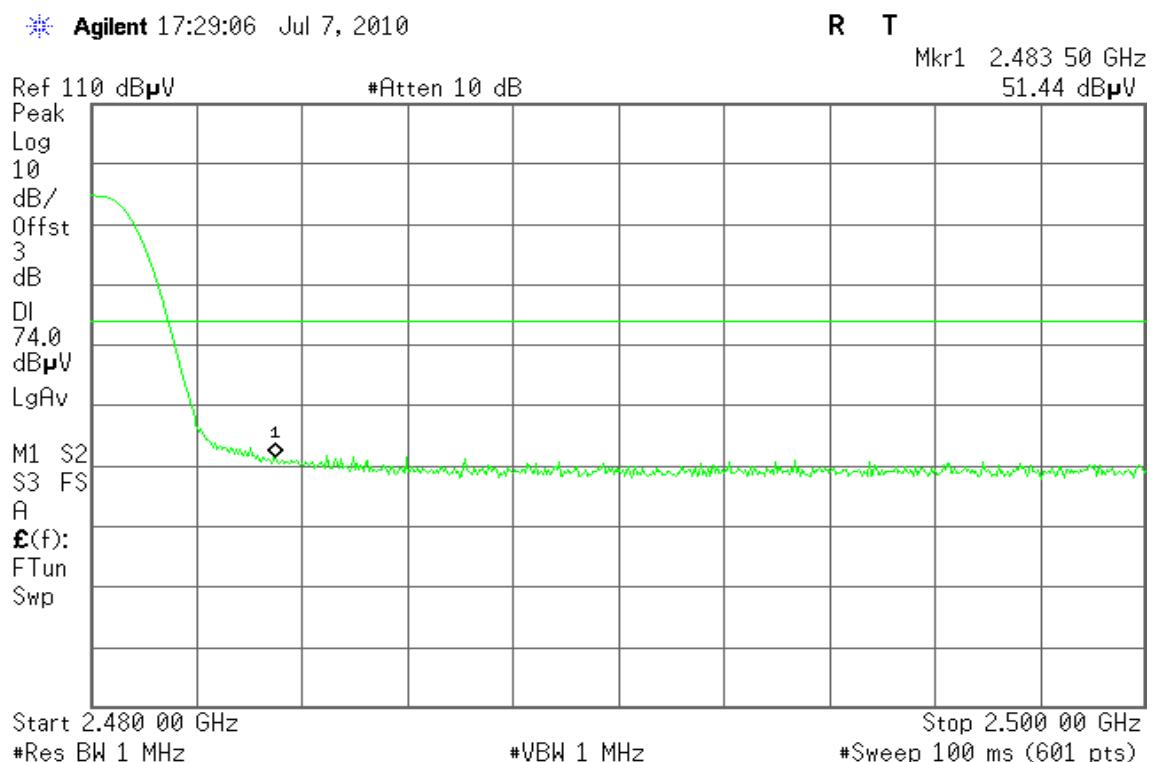
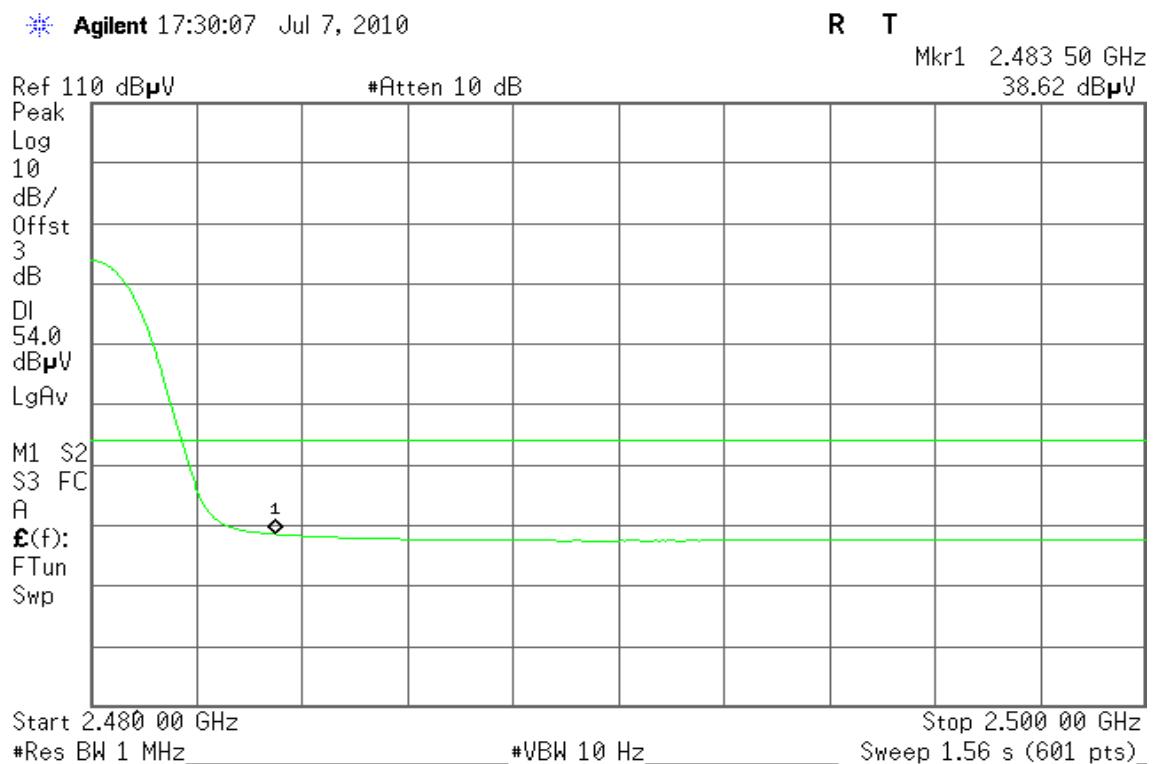
1. The EUT is placed on a turntable, which is 0.8m above the ground plane.
2. The turntable shall be rotated for 360 degrees to determine the position of maximum emission level.
3. EUT is set 3m away from the receiving antenna, which is varied from 1m to 4m to find out the highest emission.
4. Set the spectrum analyzer in the following setting in order to capture the lower and upper band-edges of the emission:
  - (a) PEAK: RBW=VBW=1MHz / Sweep=AUTO
  - (b) AVERAGE: RBW=1MHz / VBW=10Hz / Sweep=AUTO
5. Repeat the procedures until all the PEAK and AVERAGE versus POLARIZATION are measured.

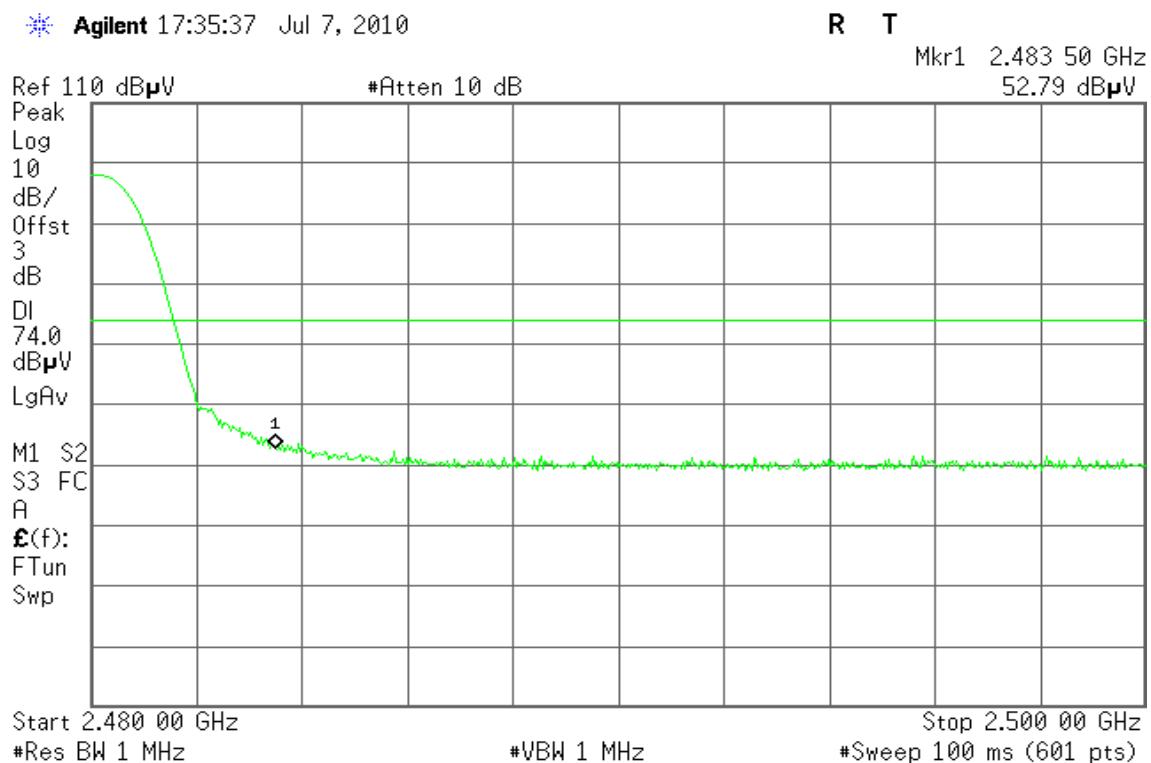
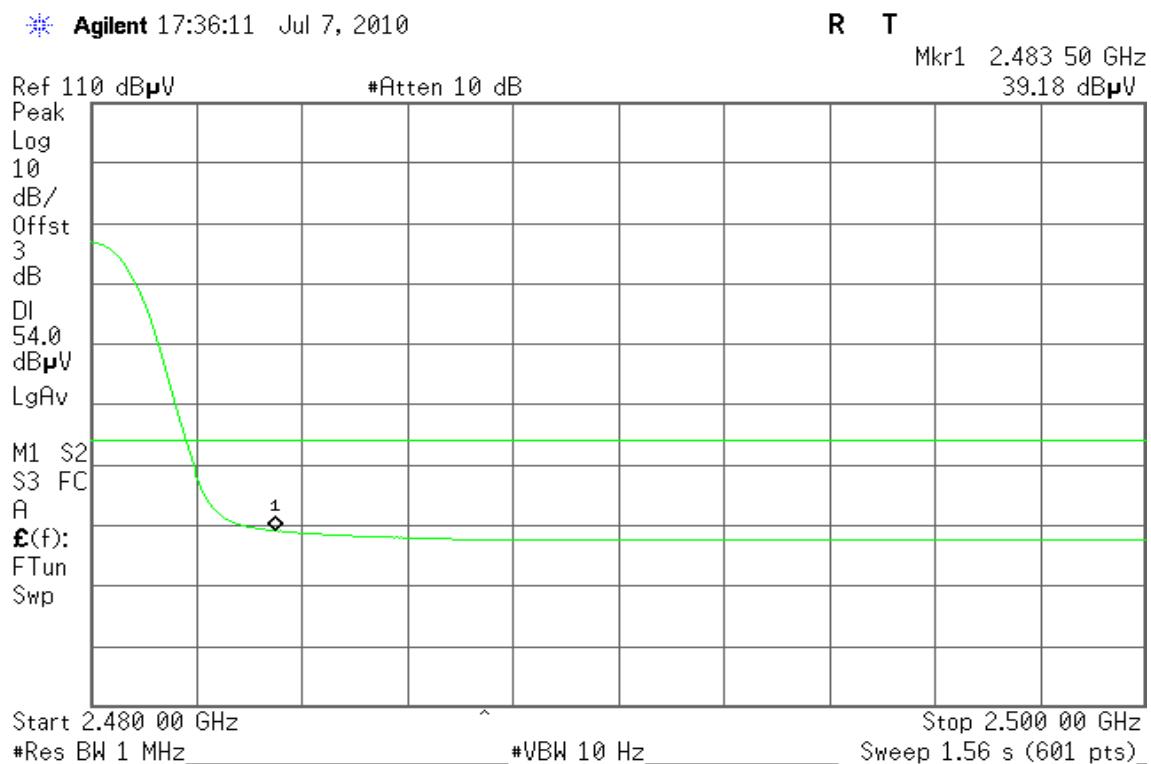
### TEST RESULTS

Refer to attach spectrum analyzer data chart.

**Band Edges (CH Low)****Detector mode: Peak****Polarity: Vertical****Detector mode: Average****Polarity: Vertical**

**Detector mode: Peak****Polarity: Horizontal****Detector mode: Average****Polarity: Horizontal**

**Band Edges (CH High)****Detector mode: Peak****Polarity: Vertical****Detector mode: Average****Polarity: Vertical**

**Detector mode: Peak****Polarity: Horizontal****Detector mode: Average****Polarity: Horizontal**

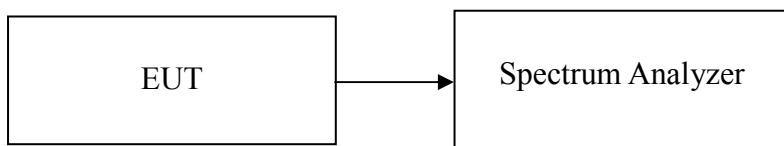


## 7.5 FREQUENCY SEPARATION

### LIMIT

According to §15.247(a)(1), Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW.

### Test Configuration



### TEST PROCEDURE

1. Place the EUT on the table and set it in transmitting mode.
2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the spectrum analyzer.
3. Set center frequency of spectrum analyzer = middle of hopping channel.
4. Set the spectrum analyzer as RBW = 30kHz, VBW = 100kHz, Span = 3MHz, Sweep = auto.
5. Max hold, mark 3 peaks of hopping channel and record the 3 peaks frequency.

### TEST RESULTS

*No non-compliance noted*

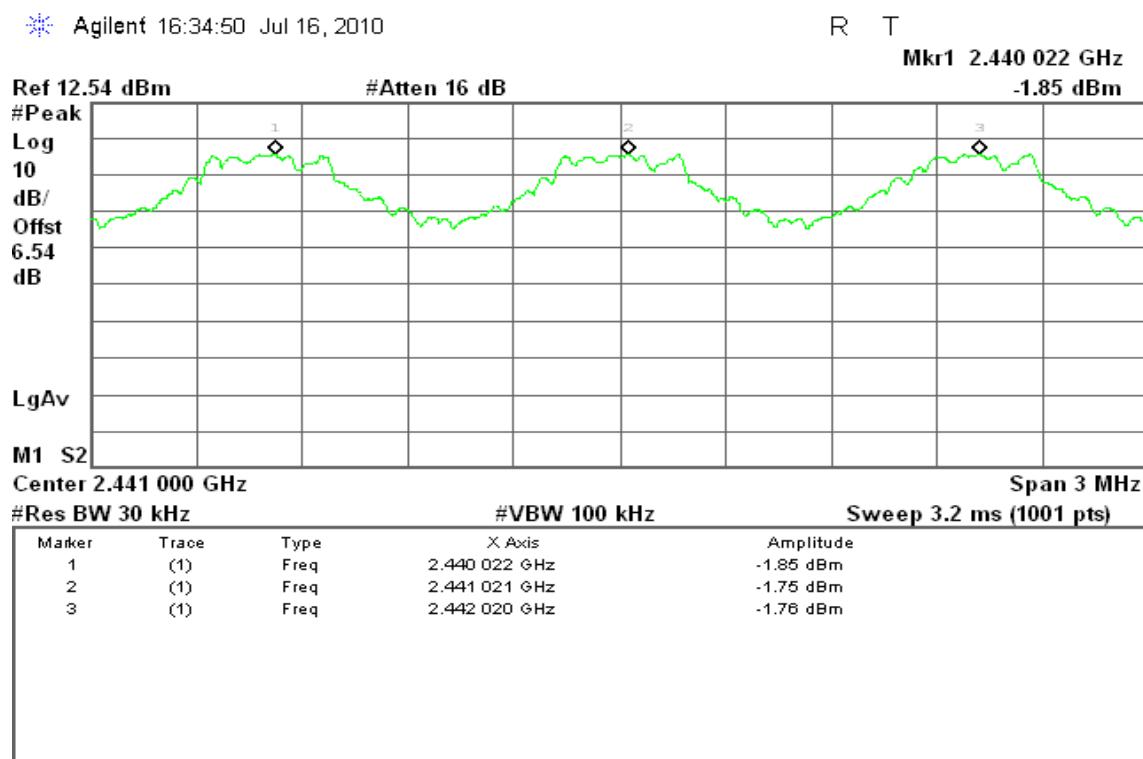
### Test Data

Channel Separation (MHz)	20dB Bandwidth (kHz)	Channel Separation Limit	Result
1.00	924	> 20dB Bandwidth	Pass

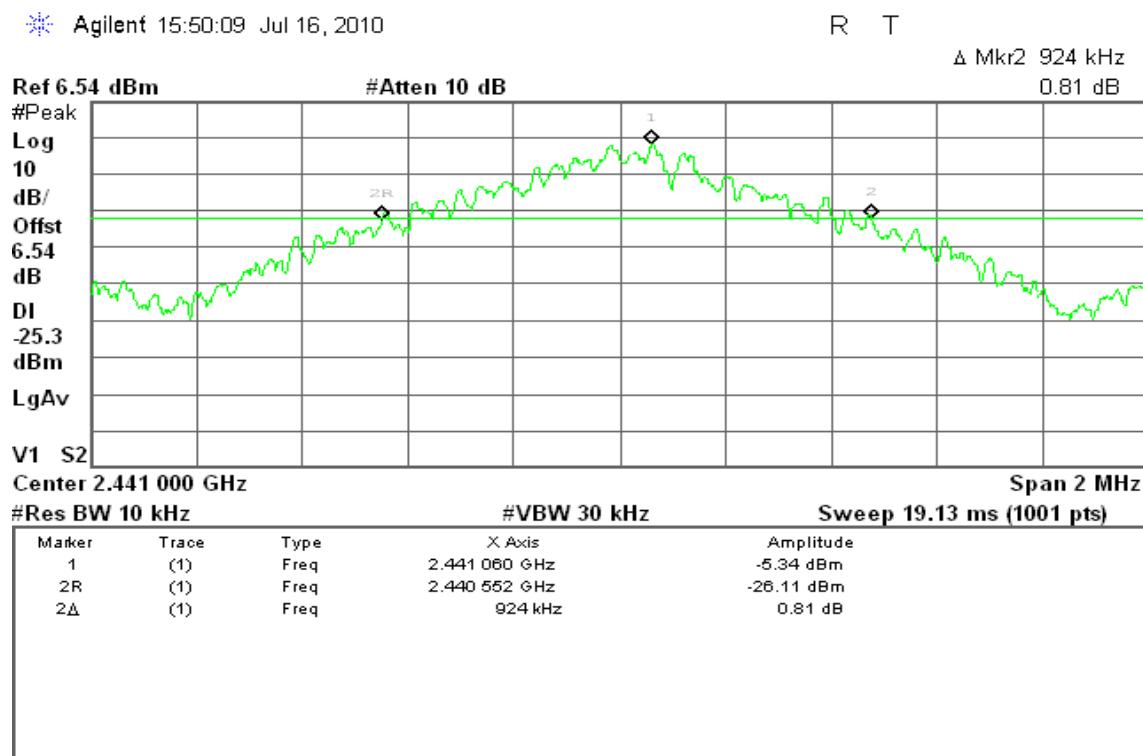


## Test Plot

### Measurement of Channel Separation



### Measurement of 20dB Bandwidth



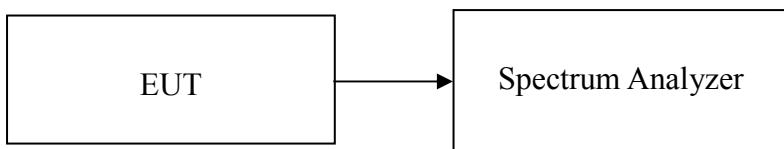


## 7.6 NUMBER OF HOPPING FREQUENCY

### LIMIT

According to §15.247(a)(1)(ii), Frequency hopping systems operating in the 2400MHz-2483.5 MHz bands shall use at least 75 hopping frequencies.

### Test Configuration



### TEST PROCEDURE

1. Place the EUT on the table and set it in transmitting mode.
2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the spectrum analyzer.
3. Set spectrum analyzer Start=2400MHz, Stop = 2441.5MHz, Sweep = auto and Start=2441.5MHz, Stop = 2483.5MHz, Sweep = auto.
4. Set the spectrum analyzer as RBW, VBW=510kHz.
5. Max hold, view and count how many channel in the band.

### TEST RESULTS

*No non-compliance noted*

### Test Data

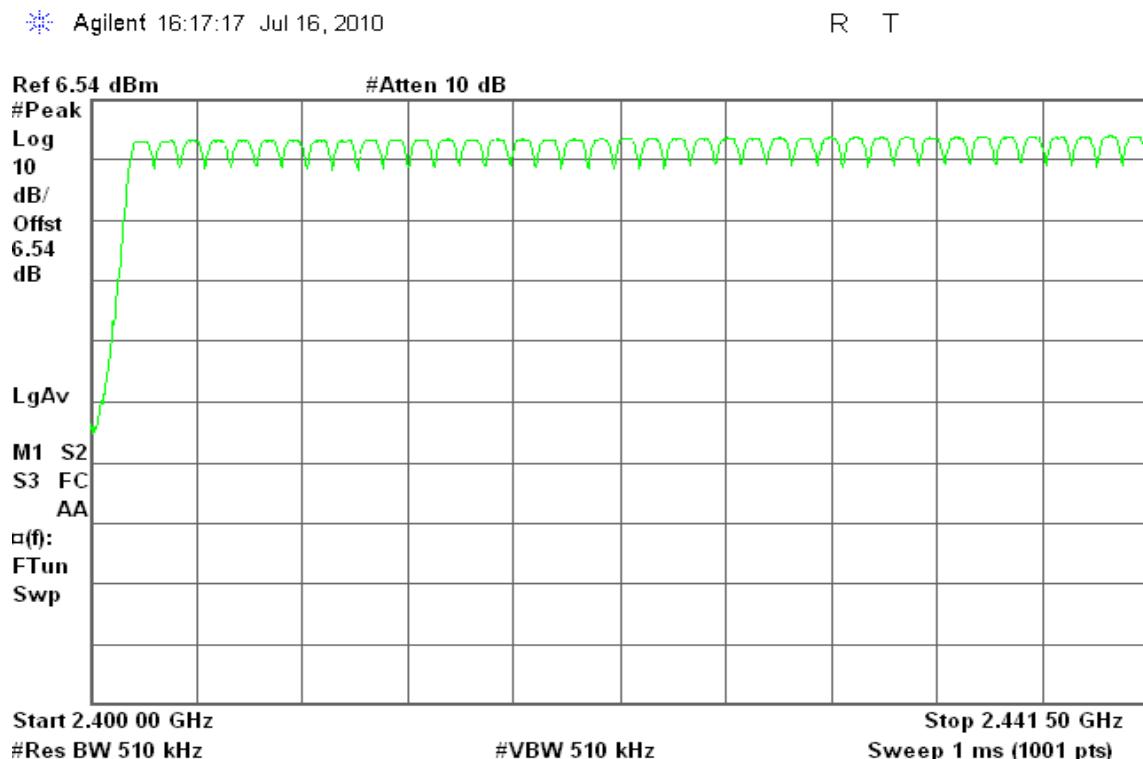
Result (No. of CH)	Limit (No. of CH)	Result
79	>75	PASS



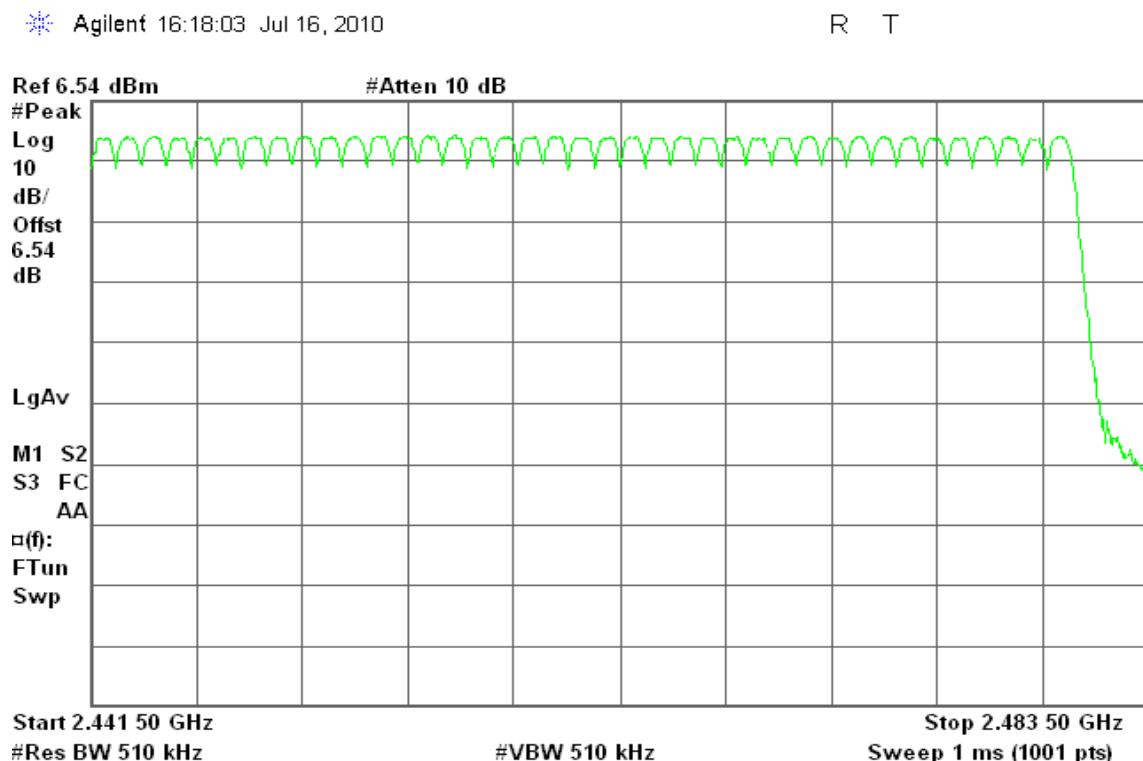
## Test Plot

### Channel Number

**2.4 GHz – 2.4415 GHz**



**2.4415 GHz – 2.4835 GHz**



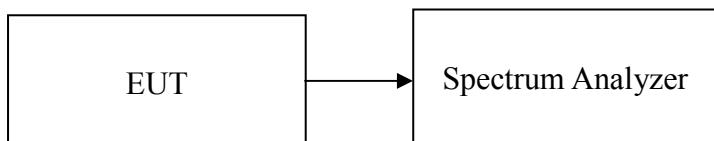


## **7.7 TIME OF OCCUPANCY (DWELL TIME)**

### **LIMIT**

According to §15.247(a)(1)(iii), Frequency hopping systems operating in the 2400MHz-2483.5 MHz bands. The average time of occupancy on any channels shall not greater than 0.4 s within a period 0.4 s multiplied by the number of hopping channels employed.

### **Test Configuration**



### **TEST PROCEDURE**

1. Place the EUT on the table and set it in transmitting mode.
2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the spectrum analyzer.
3. Set center frequency of spectrum analyzer = operating frequency.
4. Set the spectrum analyzer as RBW, VBW=1MHz, Span = 0Hz, Sweep = auto.
5. Repeat above procedures until all frequency measured were complete.

### **TEST RESULTS**

*No non-compliance noted*

**Test Data****DH 1**CH Low:  $0.380 * (1600/2)/79 * 31.6 = 121.600$  (ms)CH Mid:  $0.360 * (1600/2)/79 * 31.6 = 115.200$  (ms)CH High:  $0.370 * (1600/2)/79 * 31.6 = 118.400$  (ms)

CH	Pulse Time (ms)	Total of Dwell (ms)	Period Time (s)	Limit (ms)	Result
Low	0.380	121.600	31.60	400.00	PASS
Mid	0.360	115.200	31.60		PASS
High	0.370	118.400	31.60		PASS

**DH 3**CH Low:  $1.63 * (1600/4)/79 * 31.6 = 260.800$  (ms)CH Mid:  $1.63 * (1600/4)/79 * 31.6 = 260.800$  (ms)CH High:  $1.62 * (1600/4)/79 * 31.6 = 259.200$  (ms)

CH	Pulse Time (ms)	Total of Dwell (ms)	Period Time (s)	Limit (ms)	Result
Low	1.63	260.800	31.60	400.00	PASS
Mid	1.63	260.800	31.60		PASS
High	1.62	259.200	31.60		PASS

**DH 5**CH Low:  $2.88 * (1600/6)/79 * 31.6 = 307.200$  (ms)CH Mid:  $2.88 * (1600/6)/79 * 31.6 = 307.200$  (ms)CH High:  $2.87 * (1600/6)/79 * 31.6 = 306.133$  (ms)

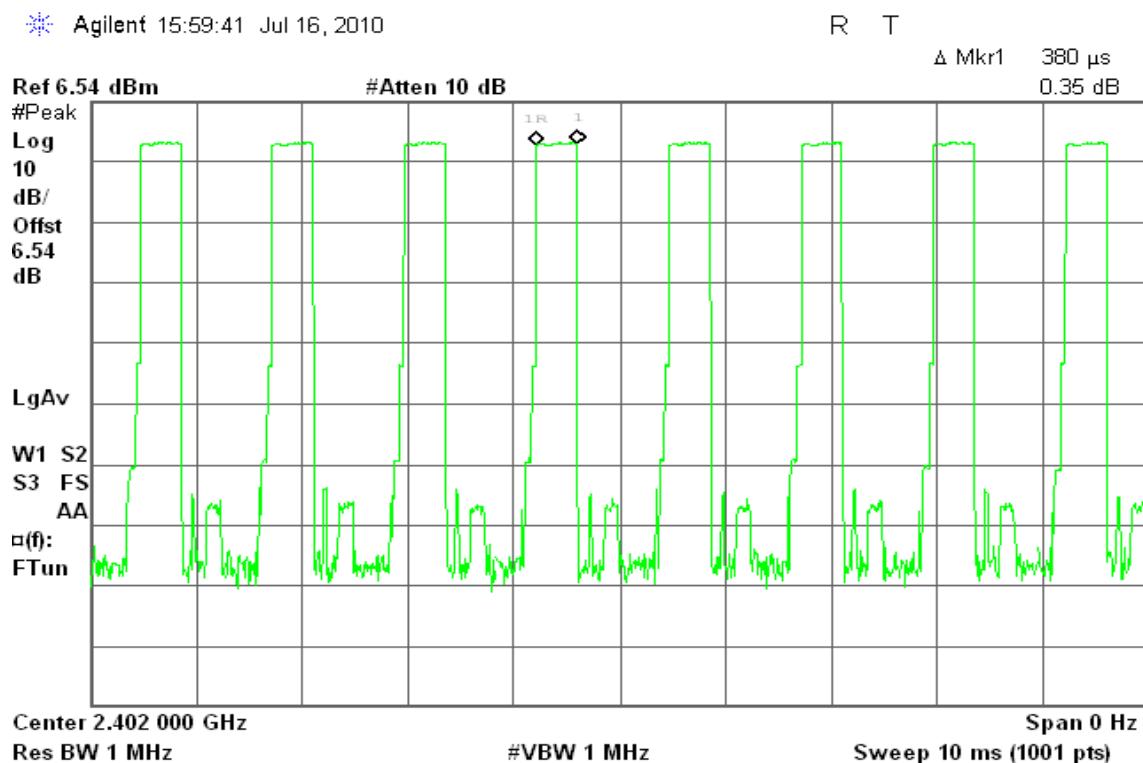
CH	Pulse Time (ms)	Total of Dwell (ms)	Period Time (s)	Limit (ms)	Result
Low	2.88	307.200	31.60	400.00	PASS
Mid	2.88	307.200	31.60		PASS
High	2.87	306.133	31.60		PASS



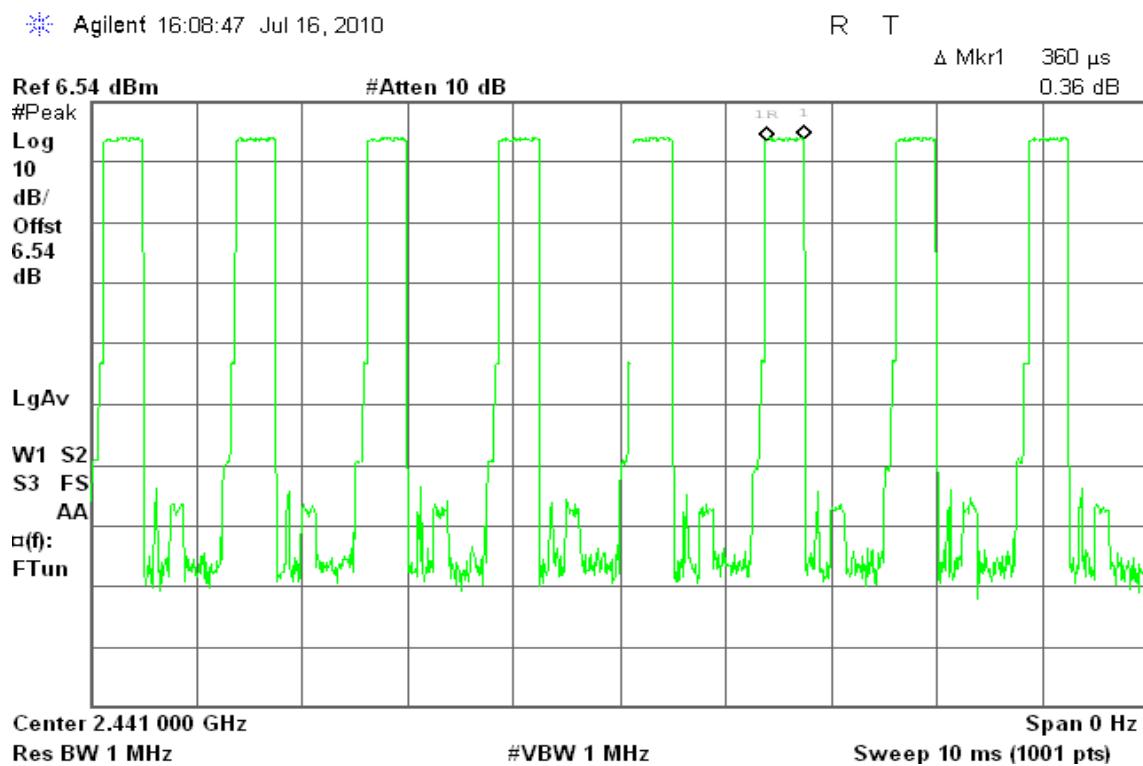
## Test Plot

### DH 1

#### CH Low

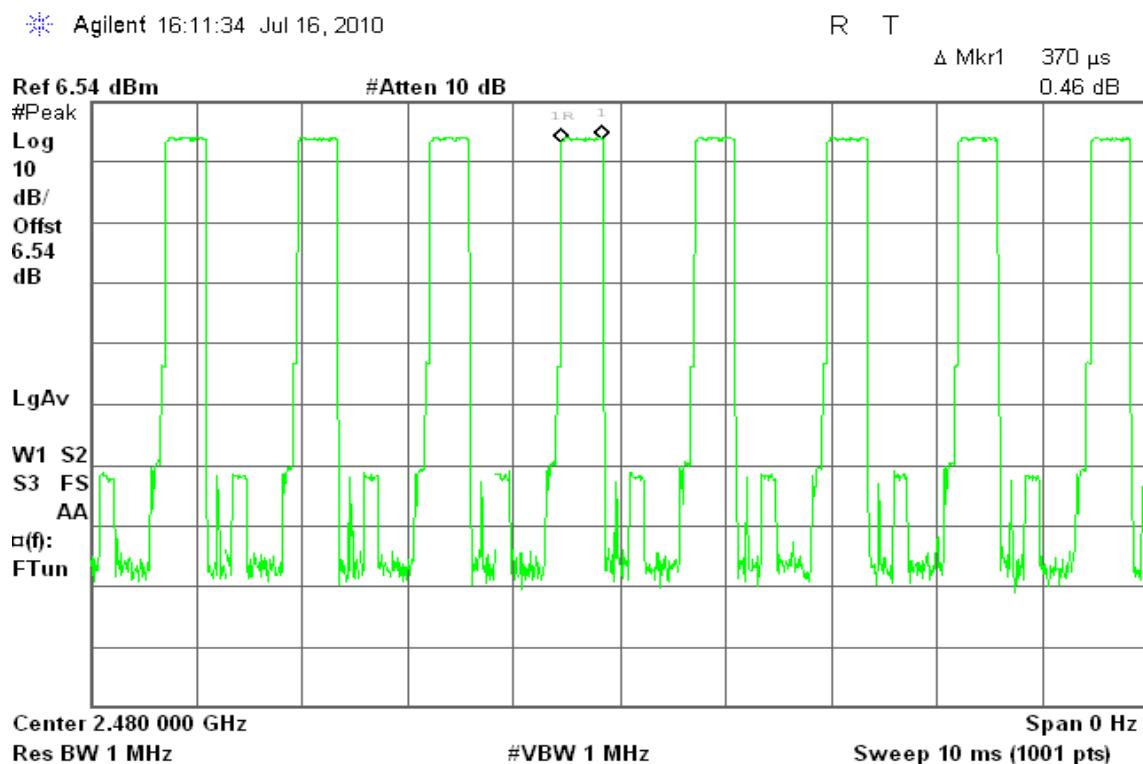


#### CH Mid



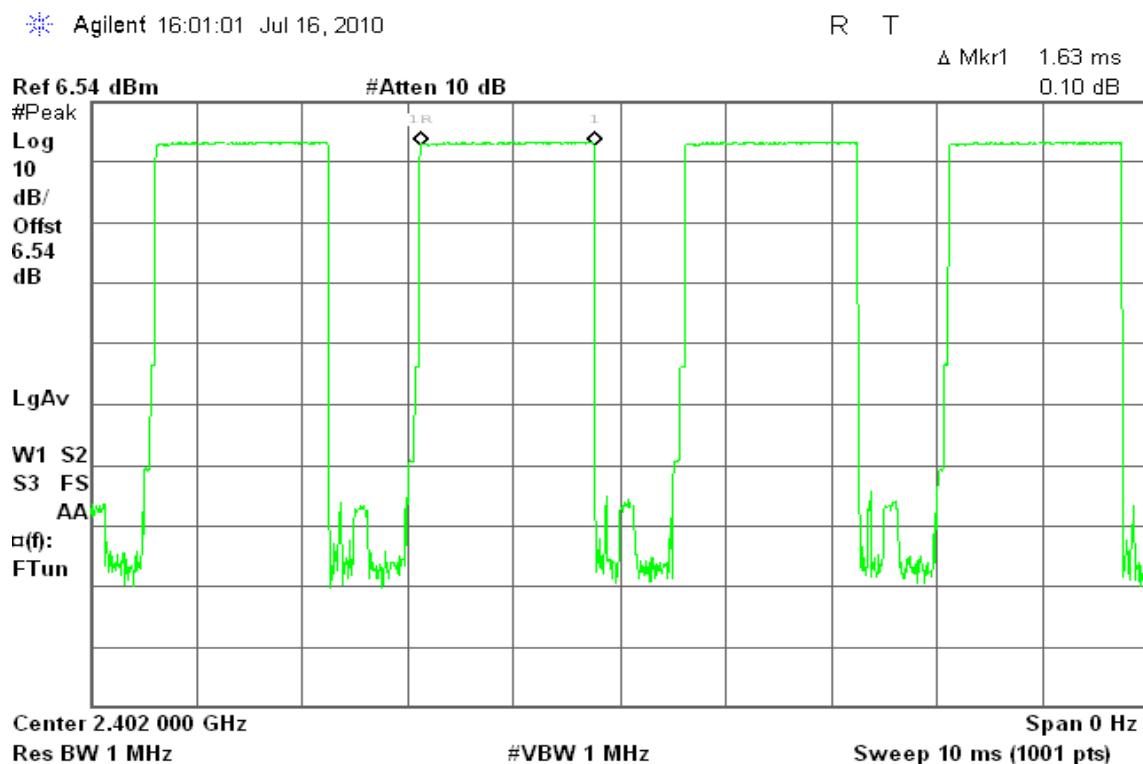


## CH High



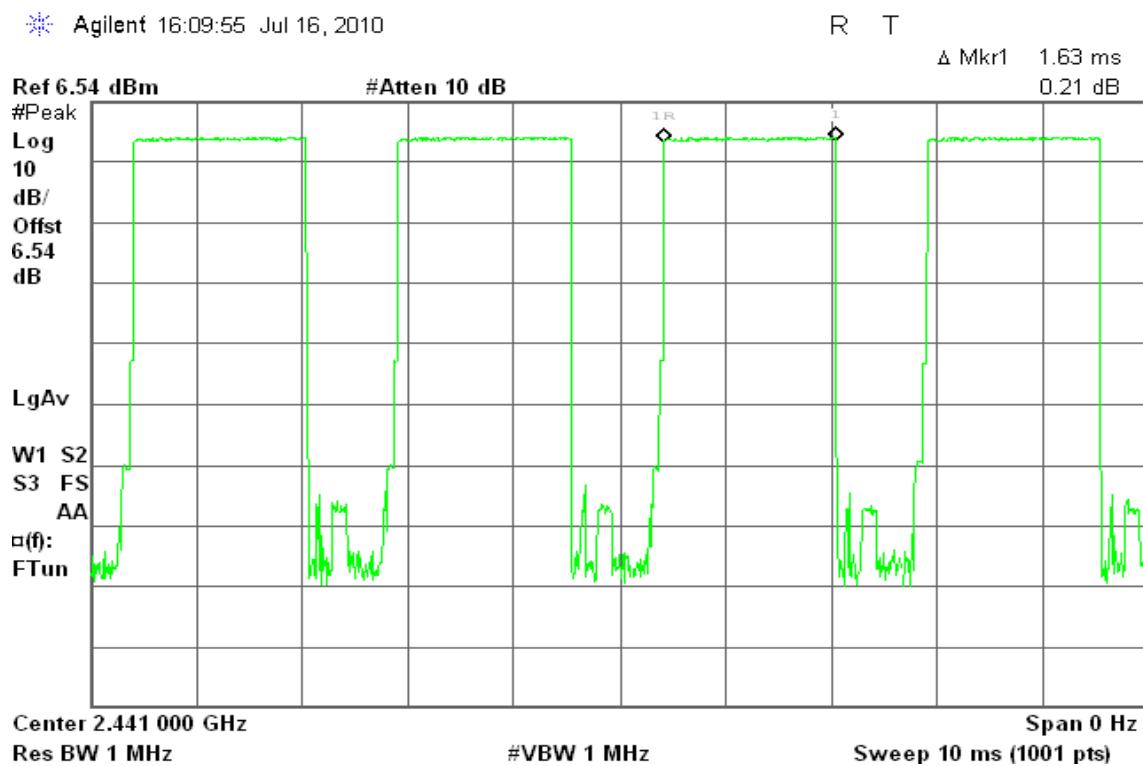
## DH 3

### CH Low

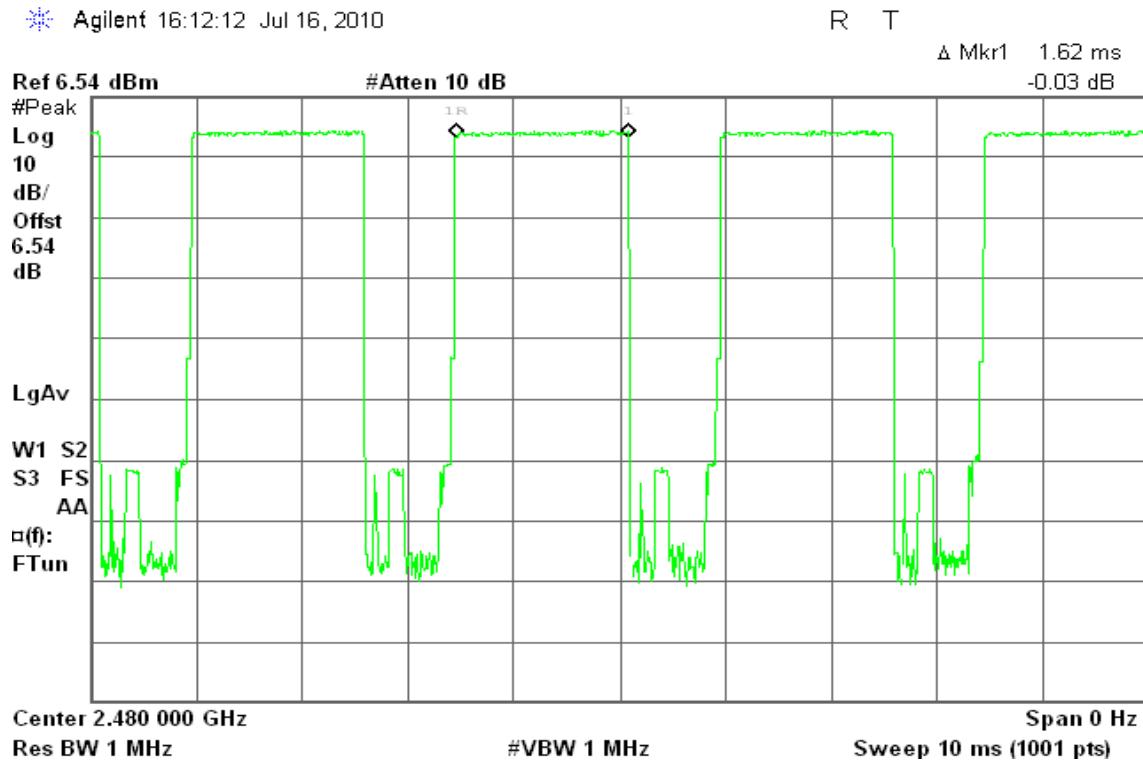


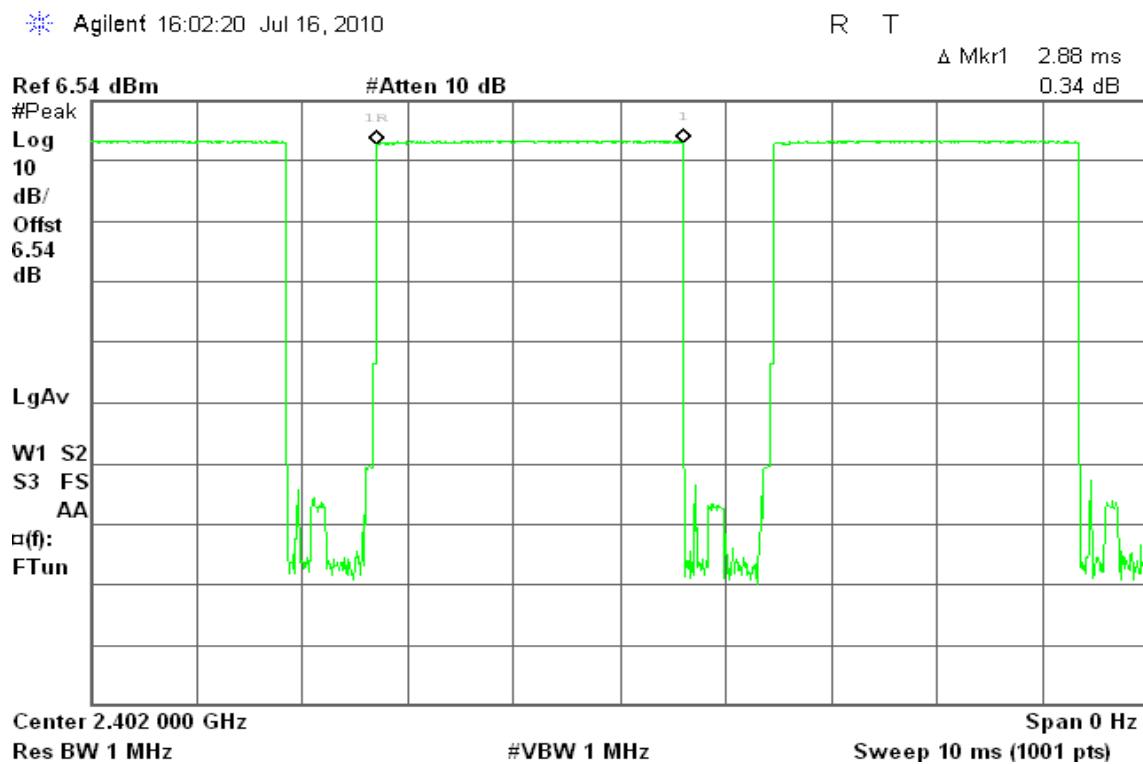
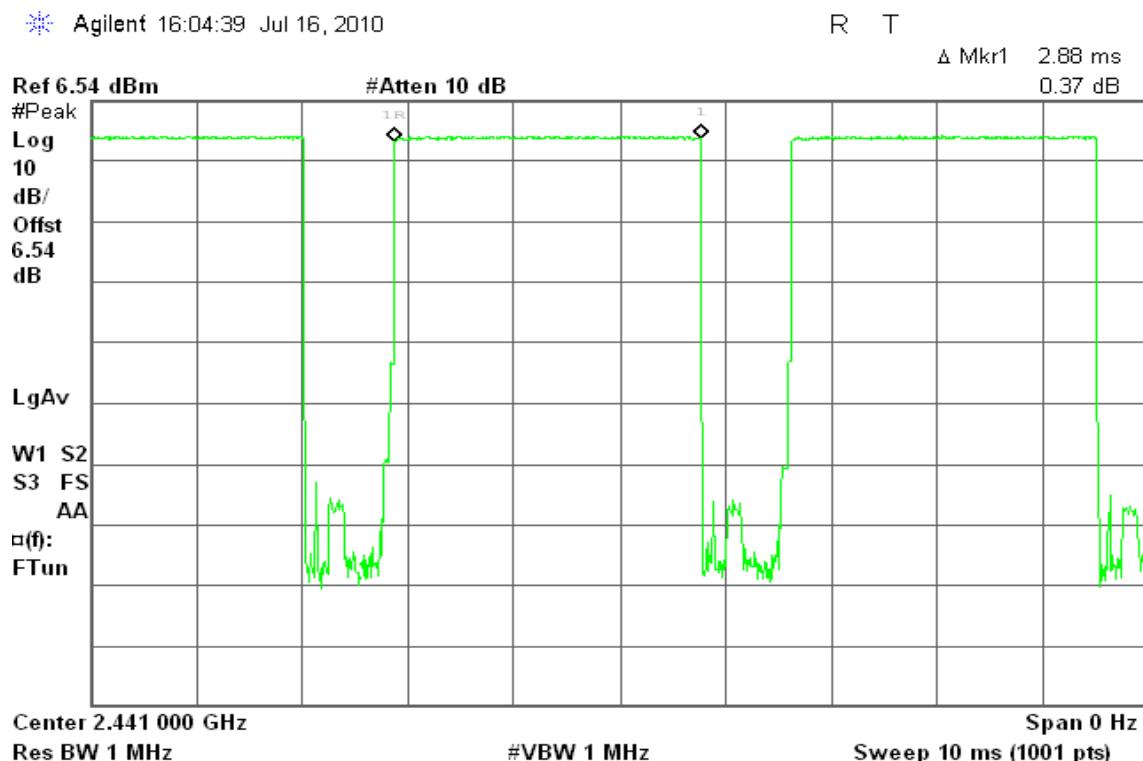


## CH Mid



## CH High



**DH 5****CH Low****CH Mid**

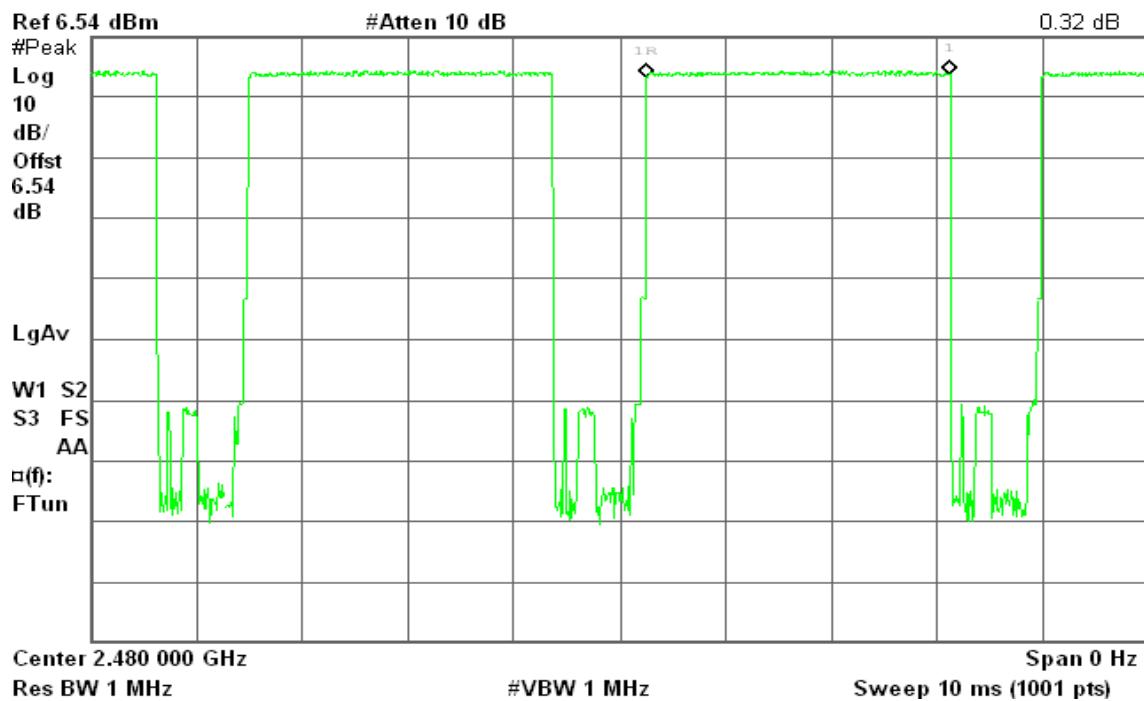


**CH High**

Agilent 16:13:22 Jul 16, 2010

R T

Δ Mkr1 2.87 ms  
0.32 dB





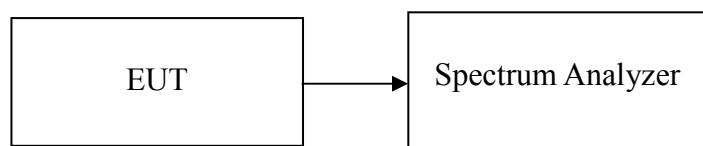
## **7.8 SPURIOUS EMISSIONS**

### **7.8.1 Conducted Measurement**

#### **LIMIT**

According to §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in 15.209(a) (see Section 15.205(c)).

#### **Test Configuration**



#### **TEST PROCEDURE**

Conducted RF measurements of the transmitter output were made to confirm that the EUT antenna port conducted emissions meet the specified limit and to identify any spurious signals that require further investigation or measurements on the radiated emissions site.

The transmitter output is connected to the spectrum analyzer. The resolution bandwidth is set to 100 kHz. The video bandwidth is set to 100 kHz.

Measurements are made over the 30MHz to 26GHz range with the transmitter set to the lowest, middle, and highest channels.

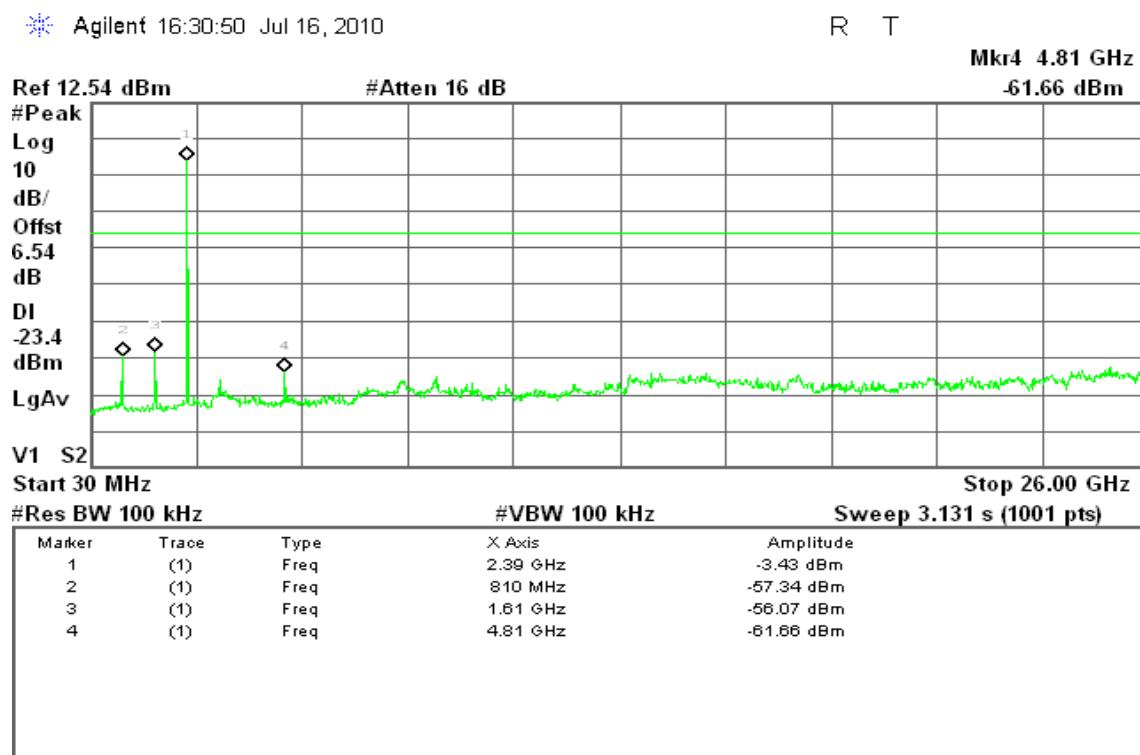
#### **TEST RESULTS**

*No non-compliance noted*

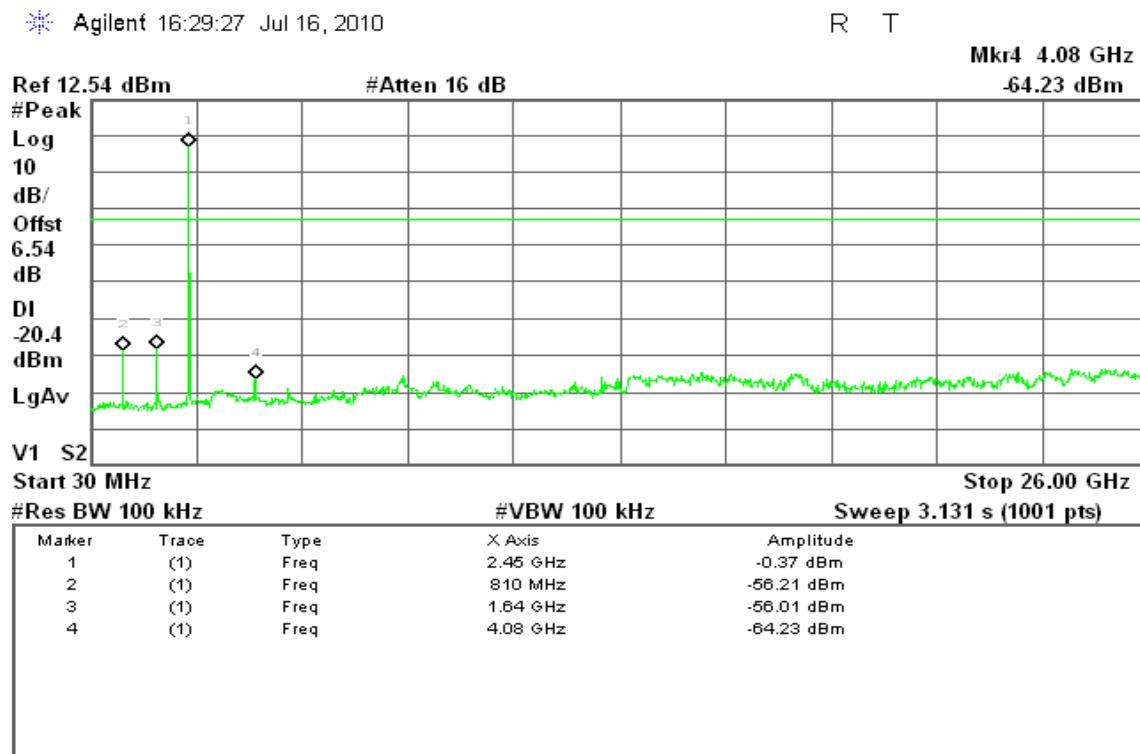


## Test Plot

### CH Low



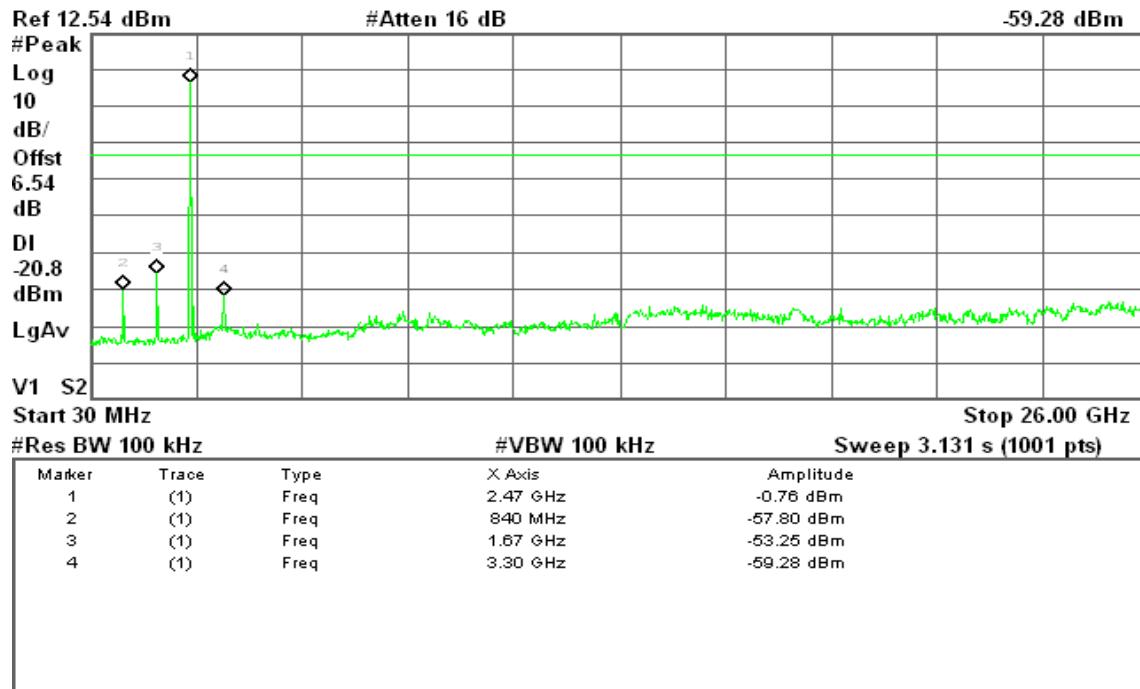
### CH Mid



**CH High**

Agilent 16:27:48 Jul 16, 2010

R T

**Mkr4 3.30 GHz****-59.28 dBm**



## 7.8.2 Radiated Emissions

### **LIMIT**

1. According to §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 ( $\mu$ V/m)	Measurement Distance (m)
30-88	100*	3
88-216	150*	3
216-960	200*	3
Above 960	500	3

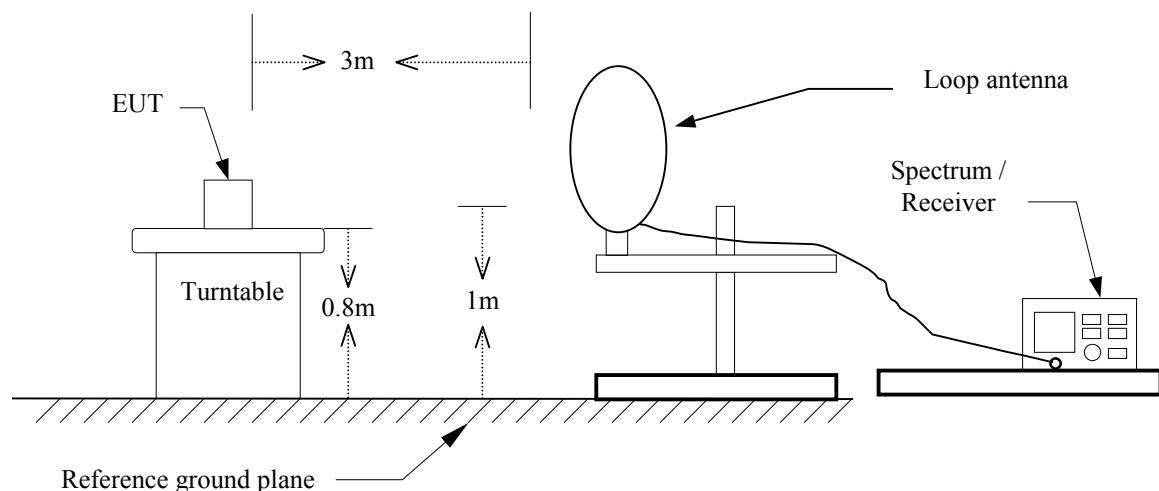
***Remark:*** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections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

2. In the emission table above, the tighter limit applies at the band edges.

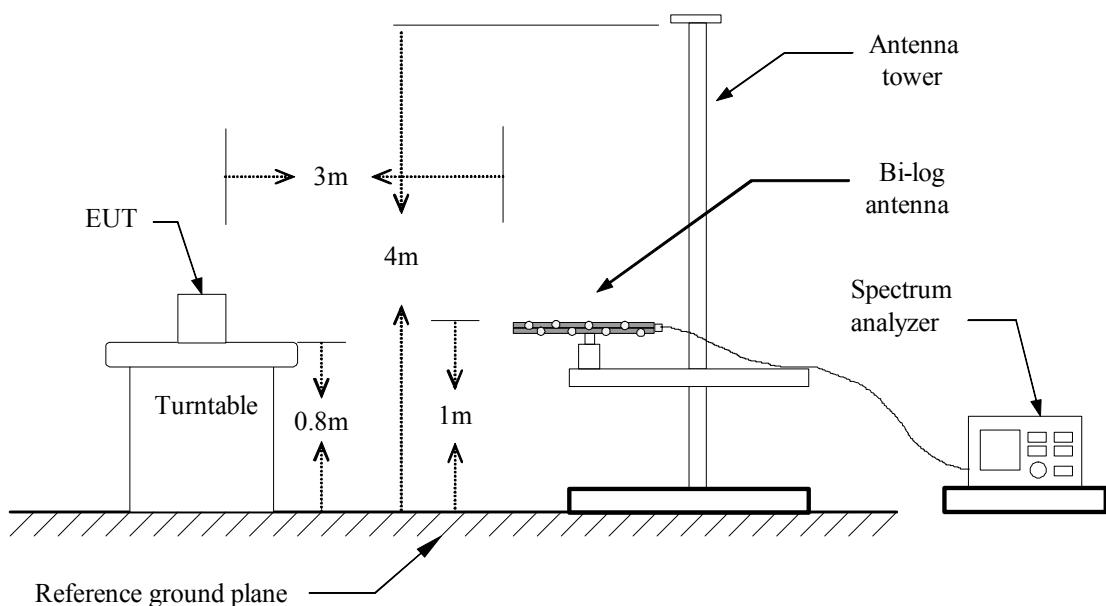
Frequency (MHz)	Field Strength ( $\mu$ V/m at 3-meter)	Field Strength (dB $\mu$ V/m at 3-meter)
30-88	100	40
88-216	150	43.5
216-960	200	46
Above 960	500	54

## Test Configuration

### 9kHz ~ 30MHz

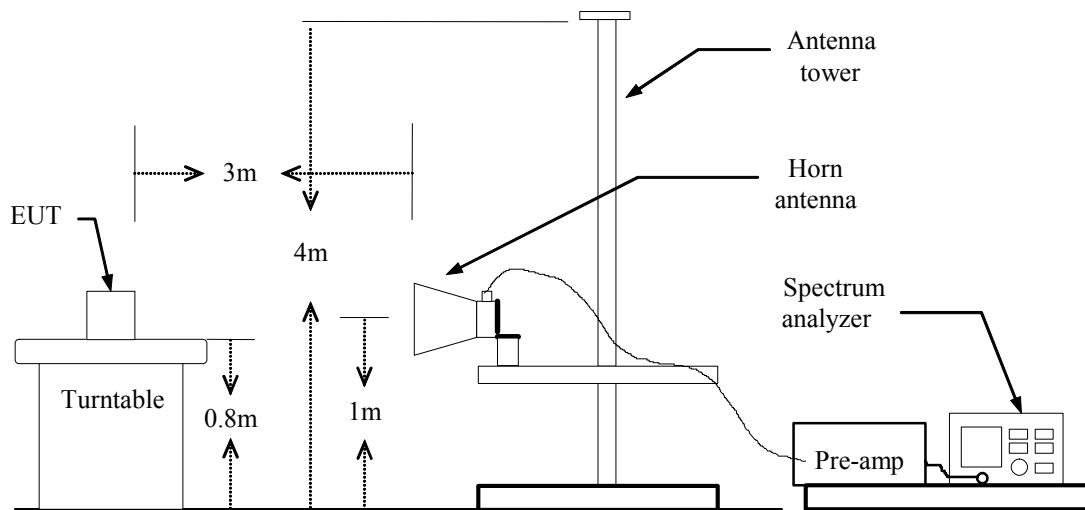


### 30MHz ~ 1GHz





**Above 1 GHz**





## **TEST PROCEDURE**

1. The EUT is placed on a turntable, which is 0.8m above ground plane.
2. The turntable shall be rotated for 360 degrees to determine the position of maximum emission level.
3. EUT is set 3m away from the receiving antenna, which is varied from 1m to 4m to find out the highest emissions.
4. Maximum procedure was performed on the six highest emissions to ensure EUT compliance.
5. And also, each emission was to be maximized by changing the polarization of receiving antenna both horizontal and vertical.
6. Set the spectrum analyzer in the following setting as:

Below 1GHz:

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

Above 1GHz:

(a) PEAK: RBW=VBW=1MHz / Sweep=AUTO

(b) AVERAGE: RBW=1MHz / VBW=10Hz / Sweep=AUTO

7. Repeat above procedures until the measurements for all frequencies are complete.

**Below 1 GHz****Operation Mode:** Normal Link**Test Date:** July 7, 2010**Temperature:** 25°C**Tested by:** Mark Yang**Humidity:** 50 % RH**Polarity:** Ver. / Hor.

Frequency (MHz)	Ant.Pol. (H/V)	Reading (dBuV)	Correction Factor (dB/m)	Result (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Remark
275.73	V	43.65	-9.50	34.15	46.00	-11.85	Peak
288.67	V	43.88	-9.36	34.52	46.00	-11.48	Peak
311.30	V	43.06	-8.97	34.09	46.00	-11.91	Peak
432.55	V	40.21	-6.29	33.92	46.00	-12.08	Peak
443.87	V	39.55	-6.01	33.54	46.00	-12.46	Peak
456.80	V	40.35	-5.76	34.59	46.00	-11.41	Peak
264.42	H	52.91	-9.93	42.98	46.00	-3.02	QP
275.73	H	52.97	-9.50	43.47	46.00	-2.53	QP
288.67	H	54.50	-9.36	45.14	46.00	-0.86	QP
299.98	H	54.29	-9.24	45.05	46.00	-0.95	QP
311.30	H	53.72	-8.97	44.75	46.00	-1.25	QP
324.23	H	51.79	-8.66	43.13	46.00	-2.87	QP

**Remark:**

1. *No emission found between lowest internal used/generated frequency to 30MHz (9kHz~30MHz).*
2. *Radiated emissions measured were made with an instrument using peak/quasi-peak detector mode.*
3. *Quasi-peak test would be performed if the peak result were greater than the quasi-peak limit or as required by the applicant.*
4. *Measurements above show only up to 6 maximum emissions noted, or would be lesser, with "N/A" remark, if no specific emissions from the EUT are recorded (ie: margin>20dB from the applicable limit) and considered that's already beyond the background noise floor.*
5. *Margin (dB) = Remark result (dBuV/m) - Quasi-peak limit (dBuV/m).*

**Above 1 GHz****Operation Mode:** TX / CH Low**Test Date:** July 7, 2010**Temperature:** 25°C**Tested by:** Mark Yang**Humidity:** 50 % RH**Polarity:** Ver. / Hor.

Frequency (MHz)	Ant.Pol. (H/V)	Reading (Peak) (dBuV)	Reading (Average) (dBuV)	Correction Factor (dB/m)	Result (Peak) (dBuV/m)	Result (Average) (dBuV/m)	Limit (Peak) (dBuV/m)	Limit (Average) (dBuV/m)	Margin (dB)	Remark
1066.67	V	58.03	---	-9.48	48.55	---	74.00	54.00	-5.45	Peak
N/A										
1610.00	H	56.14	---	-7.75	48.39	---	74.00	54.00	-5.61	Peak
N/A										

***Remark:***

1. *Measuring frequencies from 1 GHz to the 10th harmonic of highest fundamental frequency.*
2. *Radiated emissions measured in frequency above 1000MHz were made with an instrument using peak/average detector mode.*
3. *Average test would be performed if the peak result were greater than the average limit or as required by the applicant.*
4. *Data of measurement within this frequency range shown “---” in the table above means the reading of emissions are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured.*
5. *Measurements above show only up to 6 maximum emissions noted, or would be lesser, with “N/A” remark, if no specific emissions from the EUT are recorded (ie: margin>20dB from the applicable limit) and considered that's already beyond the background noise floor.*
6. *Margin (dB) = Remark result (dBuV/m) – Average limit (dBuV/m).*

**Operation Mode:** TX / CH Mid**Test Date:** July 7, 2010**Temperature:** 25°C**Tested by:** Mark Yang**Humidity:** 50 % RH**Polarity:** Ver. / Hor.

Frequency (MHz)	Ant.Pol. (H/V)	Reading (Peak) (dBuV)	Reading (Average) (dBuV)	Correction Factor (dB/m)	Result (Peak) (dBuV/m)	Result (Average) (dBuV/m)	Limit (Peak) (dBuV/m)	Limit (Average) (dBuV/m)	Margin (dB)	Remark
1066.67	V	57.37	---	-9.48	47.89	---	74.00	54.00	-6.11	Peak
N/A										
1380.00	H	55.48	---	-8.96	46.52	---	74.00	54.00	-7.48	Peak
N/A										

**Remark:**

1. Measuring frequencies from 1 GHz to the 10th harmonic of highest fundamental frequency.
2. Radiated emissions measured in frequency above 1000MHz were made with an instrument using peak/average detector mode.
3. Average test would be performed if the peak result were greater than the average limit or as required by the applicant.
4. Data of measurement within this frequency range shown “---” in the table above means the reading of emissions are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured.
5. Measurements above show only up to 6 maximum emissions noted, or would be lesser, with “N/A” remark, if no specific emissions from the EUT are recorded (ie: margin>20dB from the applicable limit) and considered that's already beyond the background noise floor.
6. Margin (dB) = Remark result (dBuV/m) – Average limit (dBuV/m).

**Operation Mode:** TX / CH High**Test Date:** July 7, 2010**Temperature:** 25°C**Tested by:** Mark Yang**Humidity:** 50 % RH**Polarity:** Ver. / Hor.

Frequency (MHz)	Ant.Pol. (H/V)	Reading (Peak) (dBuV)	Reading (Average) (dBuV)	Correction Factor (dB/m)	Result (Peak) (dBuV/m)	Result (Average) (dBuV/m)	Limit (Peak) (dBuV/m)	Limit (Average) (dBuV/m)	Margin (dB)	Remark
1066.67	V	57.93	---	-9.48	48.45	---	74.00	54.00	-5.55	Peak
N/A										
1293.33	H	55.51	---	-9.10	46.41	---	74.00	54.00	-7.59	Peak
N/A										

**Remark:**

1. Measuring frequencies from 1 GHz to the 10th harmonic of highest fundamental frequency.
2. Radiated emissions measured in frequency above 1000MHz were made with an instrument using peak/average detector mode.
3. Average test would be performed if the peak result were greater than the average limit or as required by the applicant.
4. Data of measurement within this frequency range shown “---” in the table above means the reading of emissions are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured.
5. Measurements above show only up to 6 maximum emissions noted, or would be lesser, with “N/A” remark, if no specific emissions from the EUT are recorded (ie: margin>20dB from the applicable limit) and considered that's already beyond the background noise floor.
6. Margin (dB) = Remark result (dBuV/m) – Average limit (dBuV/m).



## 7.9 POWERLINE CONDUCTED EMISSIONS

### LIMIT

According to §15.207(a), except as shown in paragraphs (b) and (c) of this section, for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50  $\mu$ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequency ranges.

Frequency Range (MHz)	Limits (dB $\mu$ V)	
	Quasi-peak	Average
0.15 to 0.50	66 to 56*	56 to 46*
0.50 to 5	56	46
5 to 30	60	50

\* Decreases with the logarithm of the frequency.

### Test Configuration

See test photographs attached in Appendix II for the actual connections between EUT and support equipment.

## TEST PROCEDURE

1. The EUT was placed on a table, which is 0.8m above ground plane.
2. Maximum procedure was performed on the six highest emissions to ensure EUT compliance.
3. Repeat above procedures until all frequency measured were complete.

## TEST RESULTS

*Not applicable, because EUT does not connect to AC Main Source direct.*



## APPENDIX I

## RADIO FREQUENCY EXPOSURE

### LIMIT

According to §15.247(i), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines. See § 1.1307(b)(1) of this chapter.

### EUT Specification

EUT	BT KEYBOARD
<b>Frequency band (Operating)</b>	<input type="checkbox"/> WLAN: 2.412GHz ~ 2.462GHz <input type="checkbox"/> WLAN: 5.18GHz ~ 5.32GHz / 5.50GHz ~ 5.70GHz <input type="checkbox"/> WLAN: 5.745GHz ~ 5.825GHz <input checked="" type="checkbox"/> Others: <u>Bluetooth: 2.402GHz ~ 2.480GHz</u>
<b>Device category</b>	<input checked="" type="checkbox"/> Portable (<20cm separation) <input type="checkbox"/> Mobile (>20cm separation) <input type="checkbox"/> Others
<b>Exposure classification</b>	<input type="checkbox"/> Occupational/Controlled exposure (S = 5mW/cm <sup>2</sup> ) <input checked="" type="checkbox"/> General Population/Uncontrolled exposure (S=1mW/cm <sup>2</sup> )
<b>Antenna diversity</b>	<input checked="" type="checkbox"/> Single antenna <input type="checkbox"/> Multiple antennas <input type="checkbox"/> Tx diversity <input type="checkbox"/> Rx diversity <input type="checkbox"/> Tx/Rx diversity
<b>Max. output power</b>	1.09 dBm (1.28 mW)
<b>Antenna gain (Max)</b>	0.05 dBi (Numeric gain: 1.01)
<b>Evaluation applied</b>	<input type="checkbox"/> MPE Evaluation <input type="checkbox"/> SAR Evaluation <input checked="" type="checkbox"/> N/A*

#### **Remark:**

1. The maximum output power is 1.09 dBm (1.28 mW) at 2402MHz (with 1.01 numeric antenna gain.)
2. DTS device is not subject to routine RF evaluation; MPE estimate is used to justify the compliance.
3. For mobile or fixed location transmitters, no SAR consideration applied. The maximum power density is 1.0 mW/cm<sup>2</sup> even if the calculation indicates that the power density would be larger.

### TEST RESULTS

No non-compliance noted.

(SAR evaluation is not required for the PORTABLE device while its maximum output power is lower than the general population low threshold:  $60/f_{GHz} = 60/2.441 = 24.58mW$ )

## **Annex**

### **Declaration for Bluetooth Device acc to Part 15.247**

**1 Output power and channel separation of a Bluetooth device in the different operating modes:**

The different operating modes (data-mode, acquisition-mode) of a Bluetooth device has no influence on the output power and the channel spacing. There is only one transmitter which is driven by identical input parameters concerning these two parameters. Only a different hopping sequence will be used. For this reason the check of these RF parameters in one op-mode is sufficient.

**2 Frequency range of a Bluetooth device:**

Hereby we declare that the maximum frequency of this device is: 2402 – 2480 MHz. This is according to the Bluetooth Core Specification (+ critical errata) for devices which will be operated in the USA. This was checked during the Bluetooth Qualification tests (Test Case: TRM/CA/04E). Other frequency ranges ( e.g. for Spain, France, Japan) which are allowed according the Core Specification are not supported by this device.

**3 Co-ordination of the hopping sequence in data mode to avoid simultaneous occupancy by multiple transmitters:**

Bluetooth units which want to communicate with other units must be organised in a structure called piconet. This piconet consists of max. 8 Bluetooth units. One unit is the master, the other seven are the slaves. The master co-ordinates frequency occupation in this piconet for all units. As the master hop sequence is derived from its BD address which is unique for each Bluetooth device, additional masters intending to establish new piconets will always use different hop sequences.

**4 Example of a hopping sequence in data mode:**

Example of a 79 hopping sequence in data mode: 40, 21, 44, 23, 42, 53, 46, 55, 48, 33, 52, 35, 50, 65, 54, 67, 56, 37, 60, 39, 58, 69, 62, 71, 64, 25, 68, 27, 66, 57, 70, 59, 72, 29, 76, 31, 74, 61, 78, 63, 01, 41, 05, 43, 03, 73, 07, 75, 09, 45, 13, 47, 11, 77, 15, 00, 64, 49, 66, 53, 68, 02, 70, 06, 01, 51, 03, 55, 05, 04

## **5 Equally average use of frequencies in data mode and behaviour for short transmissions:**

The generation of the hopping sequence in connection mode depends essentially on two input values:

1. LAP/UAP of the master of the connection
2. Internal master clock

The LAP (lower address part) are the 24 LSB's of the 48 BD\_ADDRESS. The BD\_ADDRESS is an unambiguous number of every Bluetooth unit. The UAP (upper address part) are the 24 MSB's of the 48 BD\_ADDRESS.

The internal clock of a Bluetooth unit is derived from a free running clock which is never adjusted and is never turned off. For synchronisation with other units only offset are used. It has no relation to the time of the day. Its resolution is at least half the RX/TX slot length of 312.5  $\mu$ s. The clock has a cycle of about one day (23h30). In most case it is implemented as 28 bit counter. For the deriving of the hopping sequence the entire LAP (24 bits), 4 LSB's (4 bits) (Input 1) and the 27 MSB's of the clock (Input 2) are used. With this input values different mathematical procedures (permutations, additions, XOR- operations) are performed to generate the sequence. This will be done at the beginning of every new transmission.

Regarding short transmissions the Bluetooth system has the following behaviour: The first connection between the two devices is established, a hopping sequence was generated. For transmitting the wanted data the complete hopping sequence was not used. The connection ended. The second connection will be established. A new hopping sequence is generated. Due to the fact that the Bluetooth clock has a different value, because the period between the two transmission is longer (and it cannot be shorter) than the minimum resolution of the clock (312.5  $\mu$ s). The hopping sequence will always differ from the first one.

## **6 Receiver input bandwidth and behaviour for repeated single or multiple packets:**

The input bandwidth of the receiver is 1 MHz. In every connection one Bluetooth device is the master and the other one is the slave. The master determines the hopping sequence (see chapter 5). The slave follows this sequence. Both devices shift between RX and TX time slot according to the clock of the master. Additionally the type of connection (e.g. single or multislot packet) is set up at the beginning of the connection. The master adapts its hopping frequency and its TX/RX timing according to the packet type of the connection. Also the slave of the connection will use these settings. Repeating of a packet has no influence on the hopping sequence. The hopping sequence generated by the master of the connection will be followed in any case. That means, a repeated packet will not be send on the same frequency, it is send on the next frequency of the hopping sequence.

## 7 Dwell time in data mode

The dwell time of 0.3797s within a 30 second period in data mode is independent from the packet type (packet length). The calculation for a 30 second period is as follows:

Dwell time = time slot length \* hop rate / number of hopping channels \*30s

Example for a DH1 packet (with a maximum length of one time slot) Dwell time =  $625 \mu\text{s} * 1600 \text{ 1/s} / 79 * 30\text{s} = 0.3797\text{s}$  (in a 30s period)

For multislots the hopping is reduced according to the length of the packet.  
Example for a DH5 packet (with a maximum length of five time slots) Dwell time =  $5 * 625 \mu\text{s} * 1600 * 1/5 * 1/\text{s} / 79 * 30\text{s} = 0.3797\text{s}$  (in a 30s period).

This is according the Bluetooth Core Specification V 1.0B (+ critical errata) for all Bluetooth devices. Therefore all Bluetooth devices **comply** with the FCC dwell time requirement in data mode. This was checked during the Bluetooth Qualification tests. The Dwell time in hybrid mode is measured and stated in the test report.

## 8 Channel Separation in hybrid mode

The nominal channel spacing of the Bluetooth system is 1Mhz independent of the operating mode. The maximum “initial carrier frequency tolerance” which is allowed for Bluetooth is  $f_{center} = 75 \text{ kHz}$ . This was checked during the Bluetooth Qualification tests (Test Case: TRM/CA/07E) for three frequencies (2402, 2441, 2480 MHz). Additionally an example for the channel separation is given in the test report

## 9 Derivation and examples for a hopping sequence in hybrid mode

For the generation of the inquiry and page hop sequences the same procedures as described for the data mode are used (see chapter 5), but this time with different input vectors:

- For the inquiry hop sequence, a predefined fixed address is always used. This results in the same 32 frequencies used by all devices doing an inquiry but every time with a different start frequency and phase in this sequence.
- For the page hop sequence, the device address of the paged unit is used as input vector. This results in the use of a subset of 32 frequencies which is specific for that initial state of the connection establishment between the two units. A page to different devices would result in a different subset of 32 frequencies.

So it is ensured that also in hybrid mode the frequency use is equally averaged.

Example of a hopping sequence in inquiry mode: 48, 50, 09, 13, 52, 54, 41, 45, 56, 58, 11, 15, 60, 62, 43, 47, 00, 02, 64, 68, 04, 06, 17, 21, 08, 10, 66, 70, 12, 14, 19, 23

Example of a hopping sequence in paging mode:08, 57, 68, 70, 51, 02, 42, 40, 04, 61, 44, 46, 63, 14, 50, 48, 16, 65, 52, 54, 67, 18, 58, 56, 20, 53, 60, 62, 55, 06, 66, 64

#### **10 Receiver input bandwidth and synchronisation in hybrid mode:**

The receiver input bandwidth is the same as in the data mode (1 MHz). When two Bluetooth devices establish contact for the first time, one device sends an inquiry access code, the other device is scanning for this inquiry access code. If two devices have been connected previously and want to start a new transmission, a similar procedure takes place. The only difference is, instead of the inquiry access code, an special access code, derived from the BD\_ADDRESS of the paged device will be, will be sent by the master of this connection. Due to the fact that both units have been connected before (in the inquiry procedure) the paging unit has timing and frequency information about the page scan of the paged unit. For this reason the time to establish the connection is reduced considerable.

#### **11 Spread rate / data rate of the direct sequence signal**

The Spread rate / Data rate in inquiry and paging mode can be defined via the access code. The access code is the only criterion for the system to check if there is a valid transmission or not. If you regard the presence of a valid access code as one bit of information, and compare it with the length of the access code of 68 bits, the Spread rate/ Data rate will be 68/1.

#### **12 Spurious emission in hybrid mode**

The dwell time in hybrid mode is shorter than in data mode. For this reason the spurious emissions average level in data mode is worst case. The spurious emissions peak level is the same for both modes.

#### **13 Peak power spectral density measurement**

Since the transmitter is only active for some milliseconds on one channel you would get a result with many interruptions if using a sweep time of e.g. 1s as stated in the FCC rules. Therefore a fast sweep in maxhold function is used instead and the EUT is activated several times until the measurement curve has stabilized.