

p.Lachman (HK) Ltd

GSM MOBILE PHONE

Main Model: 3222

Serial Model: C3222, S200, T200

September 24, 2012

Report No.: 12070196-FCC-R2

(This report supersedes NONE)



Modifications made to the product : None

This Test Report is Issued Under the Authority of:

Chris Bi

Chris Bi
Compliance Engineer

Alex Liu

Alex Liu
Technical Manager



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RF Test Report
To: FCC Part 15.247: 2012, ANSI C63.4: 2009

Laboratory Introduction

This test report may be reproduced in full only.
Test result presented in this test report is applicable to the representative sample only.

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Accreditations for Product Certifications

Country/Region	Accreditation Body	Scope
USA	FCC TCB, NIST	EMC , RF , Telecom
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Singapore	iDA, NIST	EMC , RF , Telecom
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1 EXECUTIVE SUMMARY & EUT INFORMATION

The purpose of this test programme was to demonstrate compliance of the p.Lachman (HK) ltd, GSM MOBILE PHONE and model: 3222 against the current Stipulated Standards. The GSM MOBILE PHONE has demonstrated compliance with the FCC 15.247: 2012, ANSI C63.4: 2009.

EUT Information

EUT Description	: GSM MOBILE PHONE
Main Model	: 3222
Serial Model	: C3222, S200, T200
Antenna Gain	: GSM850: 1 dBi PCS1900: 1 dBi Bluetooth: 2 dBi
Input Power	: Li-ion Battery: Model: BL-5BT Charge Limit: 4.2Vdc Power Rating: 3.7Vdc, 800mAh AC/DC ADAPTER Model: JDB0507 Input: 100-240V 50/60Hz 0.15A Output: 5VDC 700mA
Classification Per Stipulated Test Standard	: FCC 15.247: 2012, ANSI C63.4: 2009

Note: There is no electrical change has been made to the equipment that alters the compliance characteristics. The difference of these different models is for different Color.

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2 TECHNICAL DETAILS

Purpose	Compliance testing of GSM MOBILE PHONE with stipulated standard
Applicant / Client	p.Lachman (HK) Ltd summit building 9th floor unit G/H.No.30 Man Yue Street.Hunghom.Kowloon,HongKong
Manufacturer	sumtech industry development co limited Room 521 Sanjiu Hotel, No.1001 Shennan East Road, Luohu District, Shenzhen, China
Laboratory performing the tests	SIEMIC Nanjing (China) Laboratories NO.2-1,Longcang Dadao, Yuhua Economic Development Zone, Nanjing, China Tel:+86(25)86730128/86730129 Fax:+86(25)86730127 Email:info@siemic.com
Test report reference number	12070196-FCC-R2
Date EUT received	August 28, 2012
Standard applied	FCC 15.247: 2012, ANSI C63.4: 2009
Dates of test (from – to)	September 16, 2012-September 17, 2012
No of Units	#1
Equipment Category	DSS
Trade Name	GIGO, yaddas, rewell, Sumtech
RF Operating Frequency (ies)	GSM850 TX : 824.2 ~ 848.8 MHz; RX : 869.2 ~ 893.8 MHz PCS1900 TX : 1850.2 ~ 1909.8 MHz; RX : 1930.2 ~ 1989.8 MHz Bluetooth: 2402-2480MHz
Number of Channels	300CH (PCS1900) and 125CH (GSM850) Bluetooth: 79 CH
Modulation	GSM / GPRS: GMSK Bluetooth: GFSK
FCC ID	Q2YST3222



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3 MODIFICATION

NONE

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4 TEST SUMMARY

The product was tested in accordance with the following specifications.

All testing has been performed according to below product classification:

Spread Spectrum System/Device

Test Results Summary

Test Standard	Description	Product Class	Pass / Fail
§15.247(i), §2.1093	RF Exposure	See Above	Pass
§15.203	Antenna Requirement	See Above	Pass
§15.207(a)	AC Line Conducted Emissions	See Above	Pass
§15.205, §15.209, §15.247(d)	Radiated Emissions	See Above	Pass
§15.247(a)(1)	20 dB Bandwidth	See Above	Pass
§15.247(a)(1)	Channel Separation	See Above	Pass
§15.247(a)(1)(iii)	Time of Occupancy (Dwell Time)	See Above	Pass
§15.247(a)(1)(iii)	Quantity of Hopping Channel	See Above	Pass
§15.247(b)(1)	Peak Output Power	See Above	Pass
§15.247(d)	Band Edge	See Above	Pass

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5 MEASUREMENTS, EXAMINATION AND DERIVED RESULTS

5.1 §15.247 (i) and §2.1093 – RF Exposure

Standard Requirement:

According to §15.247 (i) and §1.1307(b)(1), 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 level in excess of the Commission's guidelines.

Table 2 – Summary of SAR Evaluation Requirements for a Cell Phone with Multiple Transmitters

	Individual Transmitter	Simultaneous Transmission
Licensed Transmitters	<u>Routine evaluation required</u>	<u>SAR not required:</u> <u>Unlicensed only</u> <ul style="list-style-type: none">○ when stand-alone 1-g SAR is not required and antenna is ≥ 5 cm from other antennas <u>Licensed & Unlicensed</u> <ul style="list-style-type: none">○ when the sum of the 1-g SAR is < 1.6 W/kg for all simultaneous transmitting antennas○ when SAR to peak location separation ratio of simultaneous transmitting antenna pair is < 0.3 <u>SAR required:</u> <u>Licensed & Unlicensed</u> antenna pairs with SAR to peak location separation ratio ≥ 0.3 ; test is only required for the configuration that results in the highest SAR in stand-alone configuration for each wireless mode and exposure condition <u>Note:</u> simultaneous transmission exposure conditions for head and body can be different for different style phones; therefore, different test requirements may apply
Jaw, Mouth and Nose	<u>Flat phantom SAR required</u> <ul style="list-style-type: none">○ when measurement is required in tight regions of SAM and it is not feasible or the results can be questionable due to probe tilt, calibration, positioning and orientation issues○ position rectangular and clam-shell phones according to flat phantom procedures and conduct SAR measurements for these specific locations	When simultaneous transmission SAR testing is required, contact the FCC Laboratory for interim guidance.



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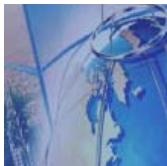
Routine SAR evaluation refers to that specifically required by § 2.1093, using measurements or computer simulation. When routine SAR evaluation is not required, portable transmitters with output power greater than the applicable low threshold require SAR evaluation to qualify for TCB approval.

Two antennas are available for the EUT, (GSM antenna, and Bluetooth antenna).

BT and GSM Antenna separation is 6.8 cm>5 cm, and the maximum EIRP is 0.89 mW<2*Pref(12 mW). According to KDB 648474, no stand-alone required for BT

Test Result: Pass

The SAR measurement is exempt.



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5.2 §15.203 – Antenna Requirement

Standard Requirement:

According to § 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 user of a standard antenna jack or electrical connector is prohibited. The structure and application of the EUT were analyzed to determine compliance with section §15.203 of the rules. §15.203 state that the subject device must meet the following criteria:

- a. Antenna must be permanently attached to the unit.
- b. Antenna must use a unique type of connector to attach to the EUT.
- c. Unit must be professionally installed, and installer shall be responsible for verifying that the correct antenna is employed with the unit.

And according to FCC 47 CFR section 15.247 (b), if the transmitting antennas of directional gain greater than 6dBi are used, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Antenna Connector Construction

The EUT has 2 antennas, one is a monopole antenna for Bluetooth, the gain is 2 dBi; one is a PIFA antenna for GSM, the gain are 1 dBi for GSM and 1 dBi for PCS which in accordance to section 15.203, please refer to the internal photos.

Test Result: Pass

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5.3 §15.207 (a) – AC Line Conducted Emissions

Standard Requirement:

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

*Decreases with the logarithm of the frequency.

Procedures:

1. All possible modes of operation were investigated. Only the 6 worst case emissions measured, using the correct CISPR and Average detectors, are reported. All other emissions were relatively insignificant.
2. A "-ve" margin indicates a PASS as it refers to the margin present below the limit line at the particular frequency.
3. Conducted Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 9kHz – 30MHz (Average & Quasi-peak) is ± 3.5 dB.
4. Environmental Conditions Temperature 22°C
 Relative Humidity 50%
 Atmospheric Pressure 1019mbar
5. Test date : September 16, 2012
Tested By : Chris Bi

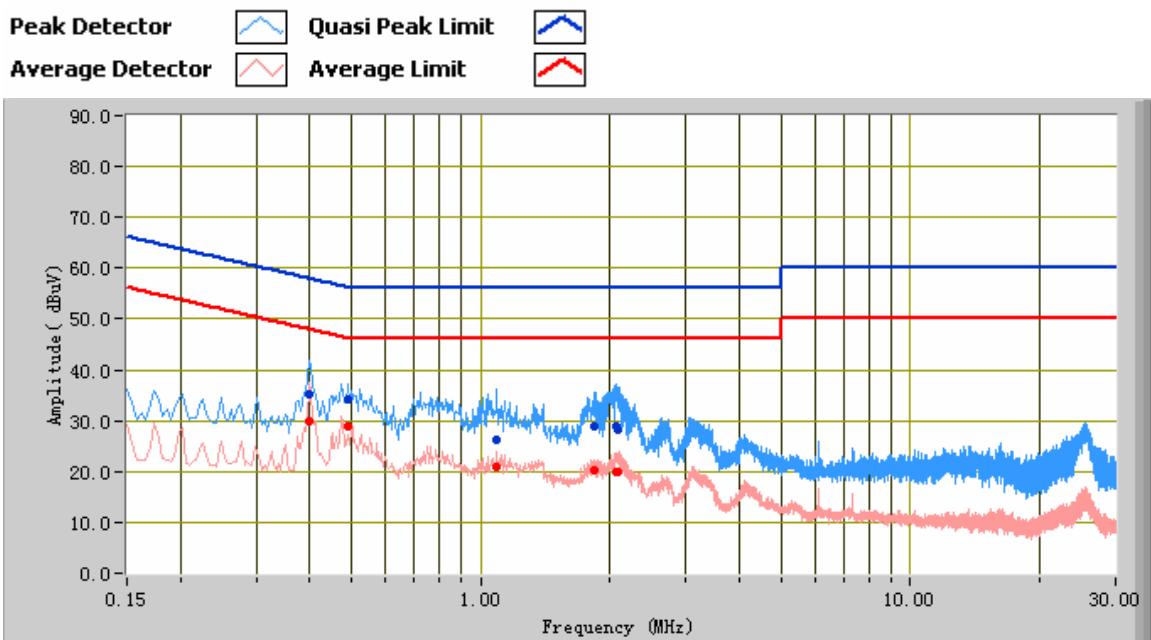
Test Result: Pass

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Test Mode:**Charging & GFSK Transmitting****Test Data****Phase Line Plot at 120Vac, 60Hz**

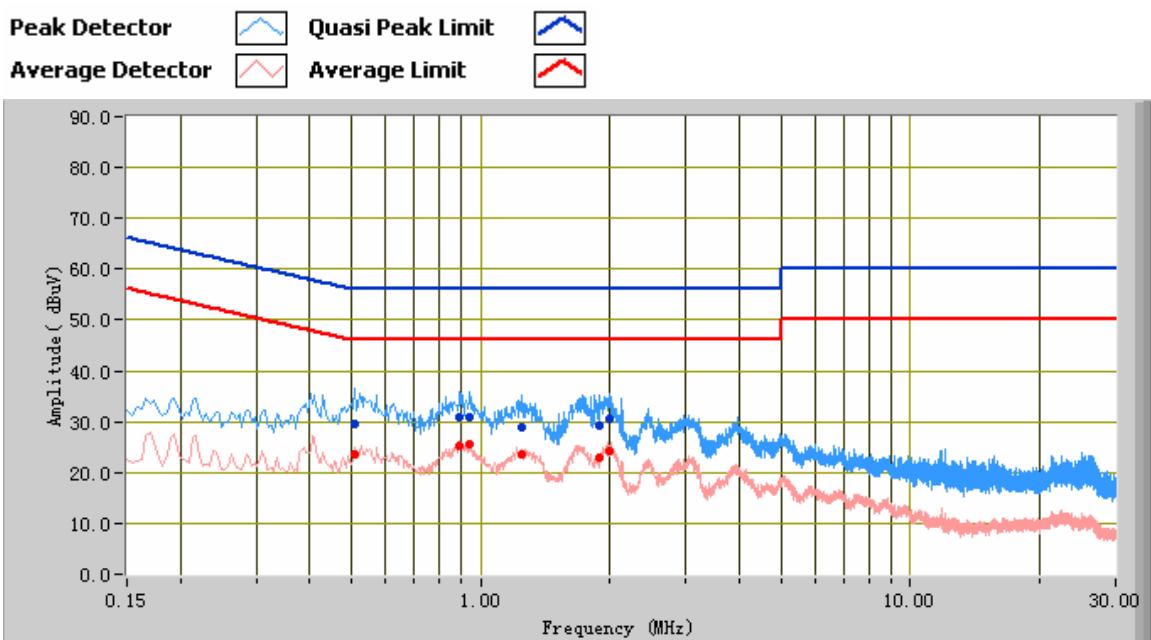
Frequency (MHz)	Quasi Peak (dB μ V)	Limit (dB μ V)	Margin (dB)	Average (dB μ V)	Limit (dB μ V)	Margin (dB)	Factors (dB)
0.40	35.19	57.93	-22.74	29.90	47.93	-18.02	10.17
2.06	28.97	56.00	-27.03	20.07	46.00	-25.93	10.20
0.49	34.23	56.17	-21.94	29.04	46.17	-17.13	10.17
2.08	28.36	56.00	-27.64	19.81	46.00	-26.19	10.20
1.09	26.26	56.00	-29.74	20.91	46.00	-25.09	10.16
1.84	28.86	56.00	-27.14	20.27	46.00	-25.73	10.19

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Test Mode: Charging & GFSK Transmitting**Test Data****Phase Neutral Plot at 120Vac, 60Hz**

Frequency (MHz)	Quasi Peak (dB μ V)	Limit (dB μ V)	Margin (dB)	Average (dB μ V)	Limit (dB μ V)	Margin (dB)	Factors (dB)
0.51	29.48	56.00	-26.52	23.73	46.00	-22.27	10.17
0.89	30.87	56.00	-25.13	25.32	46.00	-20.68	10.17
0.94	30.86	56.00	-25.14	25.50	46.00	-20.50	10.17
1.99	30.56	56.00	-25.44	24.22	46.00	-21.78	10.20
1.88	29.26	56.00	-26.74	23.07	46.00	-22.93	10.20
1.25	28.99	56.00	-27.01	23.71	46.00	-22.29	10.17



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5.4 §15.209, §15.205 & §15.247(d) - Spurious Emissions

1. All possible modes of operation were investigated. Only the 6 worst case emissions measured, using the correct CISPR detectors, are reported. All other emissions were relatively insignificant.
2. A "-ve" margin indicates a PASS as it refers to the margin present below the limit line at the particular frequency.
3. Radiated Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 1GHz (3m & 10m) & 1GHz above (3m) is +5.6/-4.5dB.
4. Environmental Conditions Temperature 22°C
 Relative Humidity 50%
 Atmospheric Pressure 1019mbar
5. Test date : September 17, 2012
Tested By : Chris Bi

Standard Requirement:

The emissions from the Low-power radio-frequency devices shall not exceed the field strength levels specified in the following table and the level of any unwanted emissions shall not exceed the level of the fundamental emission. The tighter limit applies at the band edges.

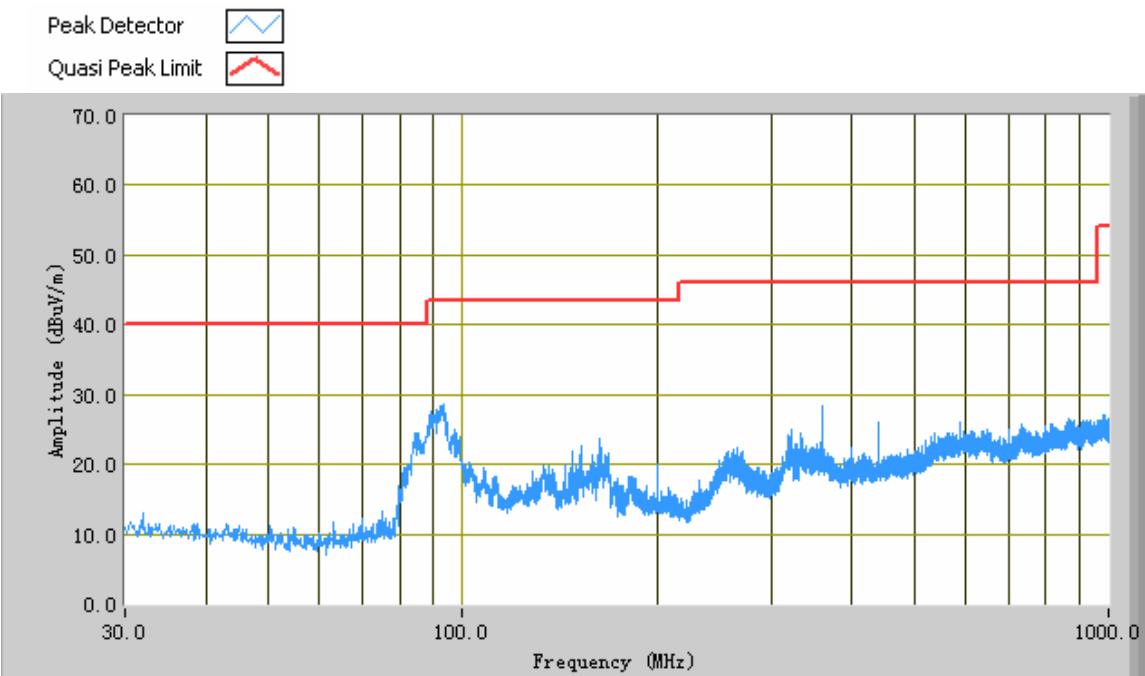
Test Result: Pass

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Test Mode: Charging & GFSK Transmitting***Below 1GHz******Test Data*****Horizontal Polarity Plot @3m**

Frequency (MHz)	Peak (dB μ V/m)	Azimuth	Polarity (H/V)	Height (cm)	Factors (dB)	Limit (dB μ V/m)	Margin (dB)
93.29	28.52	173.00	H	200.00	-35.82	43.50	-14.98
85.17	24.48	340.10	H	200.00	-37.47	40.00	-15.52
360.04	28.49	315.80	H	100.00	-28.73	46.00	-17.51
865.17	26.52	211.90	H	200.00	-21.50	46.00	-19.48
937.31	26.38	336.80	H	100.00	-21.32	46.00	-19.62
885.78	26.37	216.80	H	100.00	-21.05	46.00	-19.63

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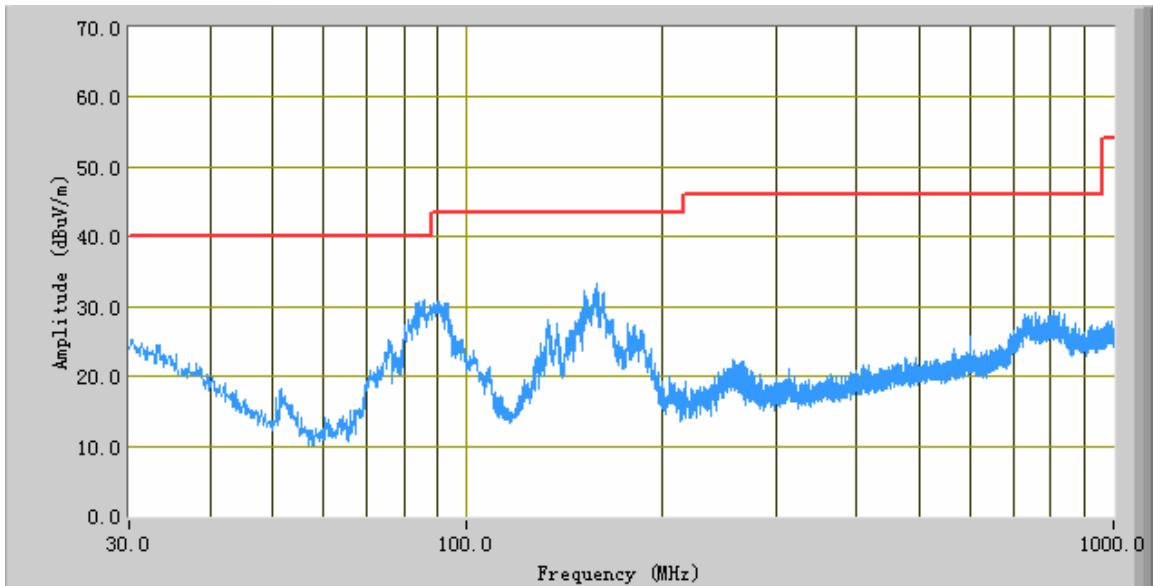
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Test Mode: Charging & GFSK Transmitting*Below 1GHz*

Peak Detector 
Quasi Peak Limit 

**Test Data****Vertical Polarity Plot @3m**

Frequency (MHz)	Peak (dB μ V/m)	Azimuth	Polarity (H/V)	Height (cm)	Factors (dB)	Limit (dB μ V/m)	Margin (dB)
85.90	31.05	307.00	V	100.00	-37.10	40.00	-8.95
158.28	33.34	31.90	V	100.00	-31.94	43.50	-10.16
152.10	32.32	91.70	V	100.00	-31.99	43.50	-11.18
90.26	30.64	312.60	V	100.00	-36.63	43.50	-12.86
30.48	25.27	117.60	V	200.00	-20.71	40.00	-14.73
75.47	25.25	238.30	V	200.00	-37.38	40.00	-14.75

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Test Mode:**Charging & GFSK Transmitting*****Above 1 GHz***

Note: Other Bluetooth modes were verified; only the result of worst case DH5 mode was presented.

Low Channel (2402 MHz)

Frequency (MHz)	S.A. Reading (dB μ V)	Detector (PK/AV)	Direction (degree)	Height (cm)	Polarity (H/V)	Ant. Factor (dB/m)	Cable Loss (dB)	Pre-Amp. Gain (dB)	Cord. Amp. (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
4804	53.56	AV	0	100	V	32.7	8.17	55	39.43	54	-14.57
4804	52.1	AV	0	100	H	32.7	8.17	55	37.97	54	-16.03
4804	58.97	PK	0	100	V	32.7	8.17	55	44.84	74	-29.16
4804	57.81	PK	180	100	H	32.7	8.17	55	43.68	74	-30.32
2396.8	56.33	AV	0	100	V	9.2	5.67	55	16.2	54	-37.8
2396.8	54.11	AV	100	110	H	9.2	5.67	55	13.98	54	-40.02
2396.8	68.94	PK	180	100	V	9.2	5.67	55	28.81	74	-45.19
2396.8	65.66	PK	360	120	H	9.2	5.67	55	25.53	74	-48.47

Middle Channel (2441 MHz)

Frequency (MHz)	S.A. Reading (dB μ V)	Detector (PK/AV)	Direction (degree)	Height (cm)	Polarity (H/V)	Ant. Factor (dB/m)	Cable Loss (dB)	Pre-Amp. Gain (dB)	Cord. Amp. (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
4882	52.66	AV	0	110	V	32.8	9	55	39.46	54	-14.54
4882	51.98	AV	90	100	H	32.8	9	55	38.78	54	-15.22
4882	58.49	PK	100	120	V	32.8	9	55	45.29	74	-28.71
4882	57.37	PK	110	100	H	32.8	9	55	44.17	74	-29.83
7323	46.55	AV	180	110	V	35.6	11.16	55	38.31	54	-15.69
7323	45.34	AV	180	100	H	35.6	11.16	55	37.1	54	-16.9
7323	48.71	PK	190	110	V	35.6	11.16	55	40.47	74	-33.53
7323	48.56	PK	180	110	H	35.6	11.16	55	40.32	74	-33.68

High Channel (2480 MHz)

Frequency (MHz)	S.A. Reading (dB μ V)	Detector (PK/AV)	Direction (degree)	Height (cm)	Polarity (H/V)	Ant. Factor (dB/m)	Cable Loss (dB)	Pre-Amp. Gain (dB)	Cord. Amp. (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
4960	54.12	AV	360	100	V	32.9	10.16	55	42.18	54	-11.82
4960	52.55	AV	90	110	H	32.9	10.16	55	40.61	54	-13.39
4960	59.64	PK	180	100	V	32.9	10.16	55	47.7	74	-26.3
4960	58.33	PK	180	100	H	32.9	10.16	55	46.39	74	-27.61
2487.5	55.64	AV	10	100	H	9.4	5.5	55	15.54	54	-38.46
2487.5	53.26	AV	90	120	V	9.4	5.5	55	13.16	54	-40.84
2487.5	67.51	PK	180	100	H	9.4	5.5	55	27.41	74	-46.59
2487.5	64.35	PK	360	120	V	9.4	5.5	55	24.25	74	-49.75

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5.5 §15.247(a) (1)-Channel Separation

1. Conducted Measurement

EUT was set for low, mid, high channel with modulated mode and highest RF output power. The spectrum analyzer was connected to the antenna terminal.

2. Environmental Conditions

Temperature	22°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar

3. Conducted Emissions Measurement Uncertainty

All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is ± 1.5 dB.

4. Test date : September 17, 2012

Tested By : Chris Bi

Standard Requirement:

According to §15.247(a)(1), Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or two-thirds of the 20dB 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.

Procedures:

1. Place the EUT on the table and set it in hopping function 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 Resolution (or IF) Bandwidth (RBW) $\geq 1\%$ of the span, Video (or Average) Bandwidth (VBW) \geq RBW, Sweep = auto, Detector function = peak, Trace = max hold.
5. Max hold, mark 2 peaks of hopping channel and record the 2 peaks frequency.

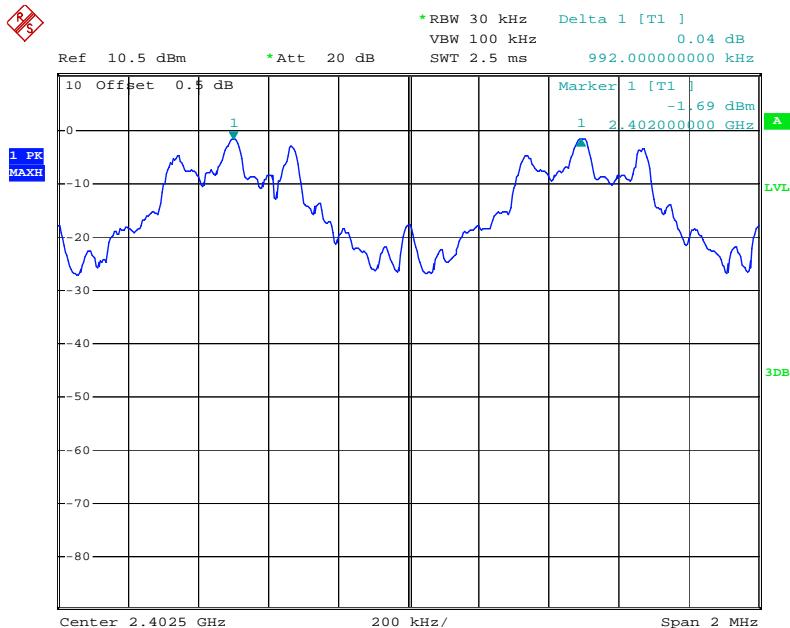
Test Result: Pass

Test Mode:	GFSK Transmitting			
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Channel	Channel Frequency (MHz)	Channel Separation (MHz)	Limit (MHz)	Result
Low Channel	2402	0.992	0.699	Pass
Adjacency Channel	2403			
Mid Channel	2440	1.008	0.707	Pass
Adjacency Channel	2441			
High Channel	2480	0.996	0.704	Pass
Adjacency Channel	2479			

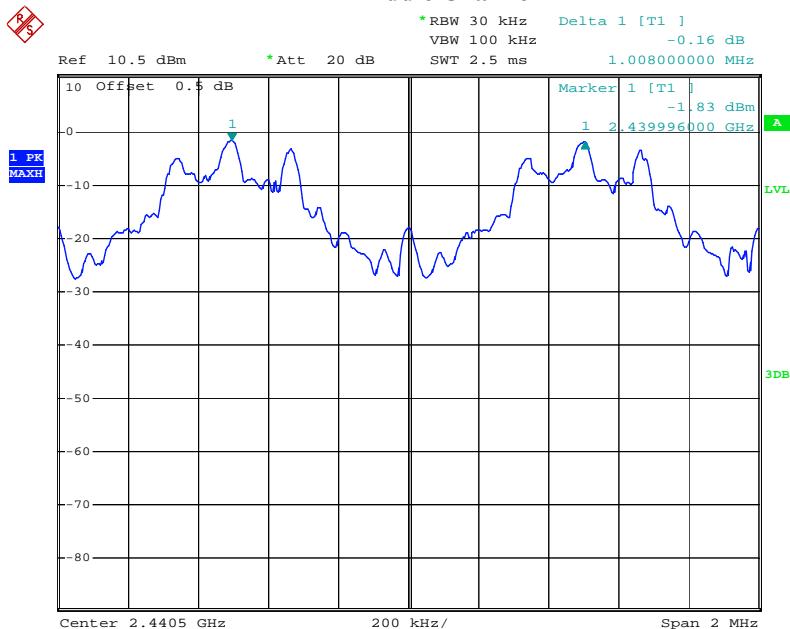
Please refer to the following plots.

Low Channel



Date: 17.SEP.2012 22:46:39

Middle Channel



Date: 17.SEP.2012 22:44:52



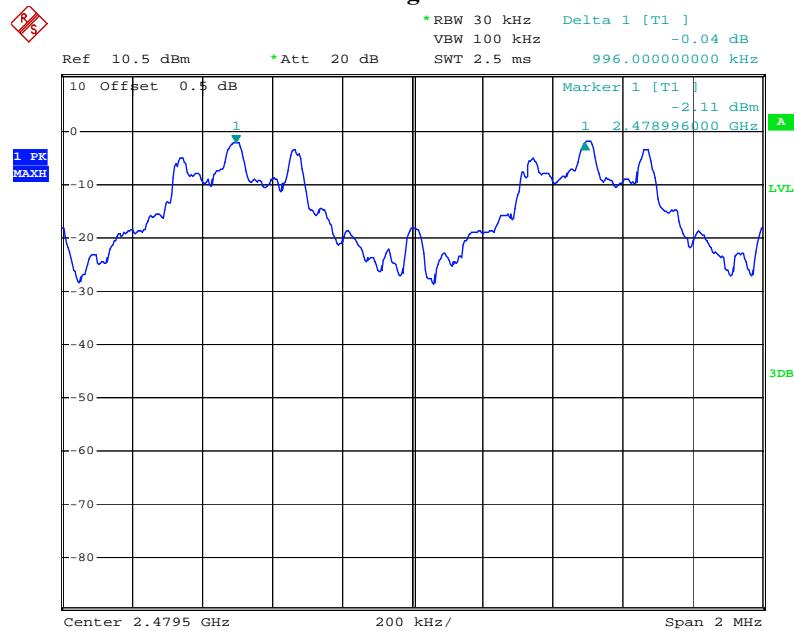
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High Channel



Date: 17.SEP.2012 22:43:25

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§15.247(a) (1) – 20dB Bandwidth

1. Conducted Measurement

EUT was set for low, mid, high channel with modulated mode and highest RF output power. The spectrum analyzer was connected to the antenna terminal.

2. Environmental Conditions

Temperature	22°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar

3. Conducted Emissions Measurement Uncertainty

All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is ± 1.5 dB.

4. Test date : September 17, 2012

Tested By : Chris Bi

Standard Requirement:

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.

Procedures:

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 the spectrum analyzer as Span = approximately 2 to 3 times the 20 dB bandwidth, centered on a hopping channel, $RBW \geq 1\%$ of the 20 dB bandwidth, $VBW \geq RBW$, Sweep = auto, Detector function = peak, Trace = max hold.
4. Set the measured low, middle and high frequency and test 20dB bandwidth with spectrum analyzer.

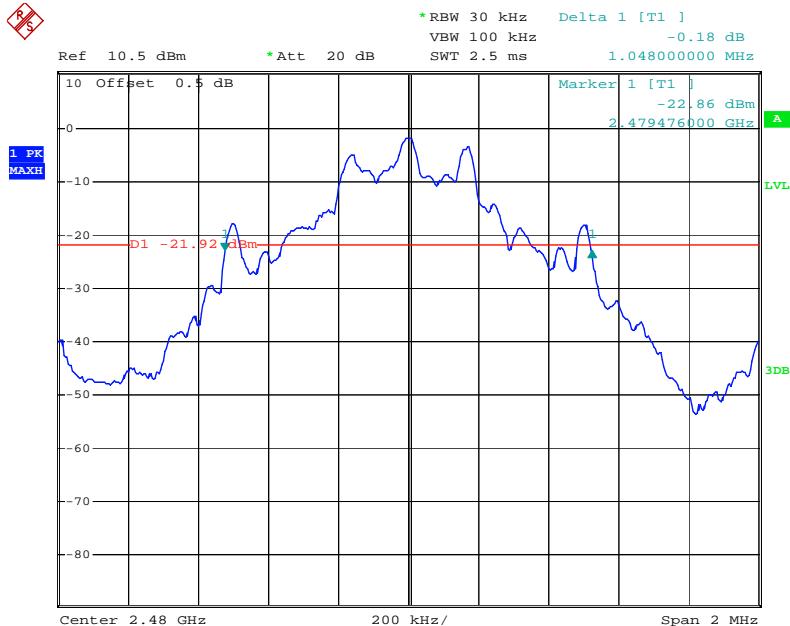
Test Result: Pass

Test Mode:	GFSK Transmitting
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Channel	Frequency (MHz)	20 dB Bandwidth (MHz)
Low	2402	1.048
Middle	2441	1.060
High	2480	1.056

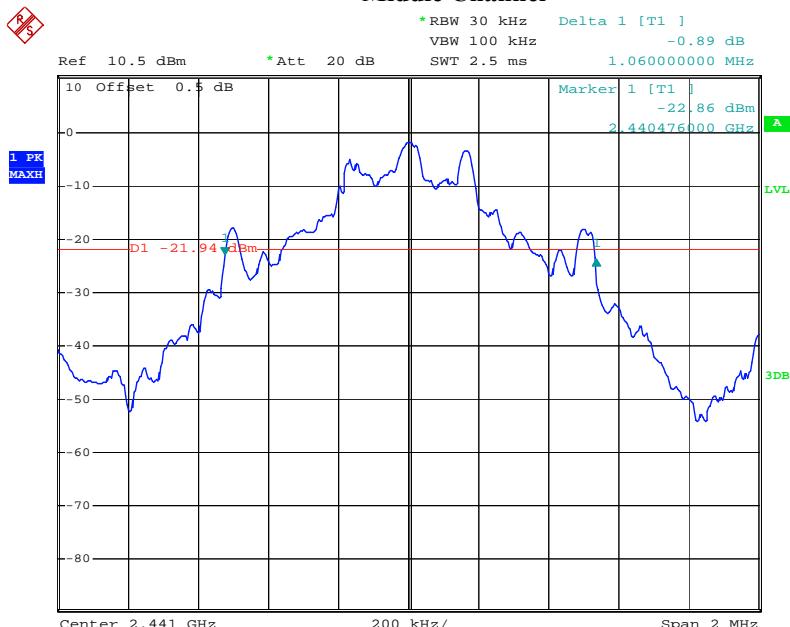
Please refer to the following plots.

Low Channel



Date: 17.SEP.2012 22:42:04

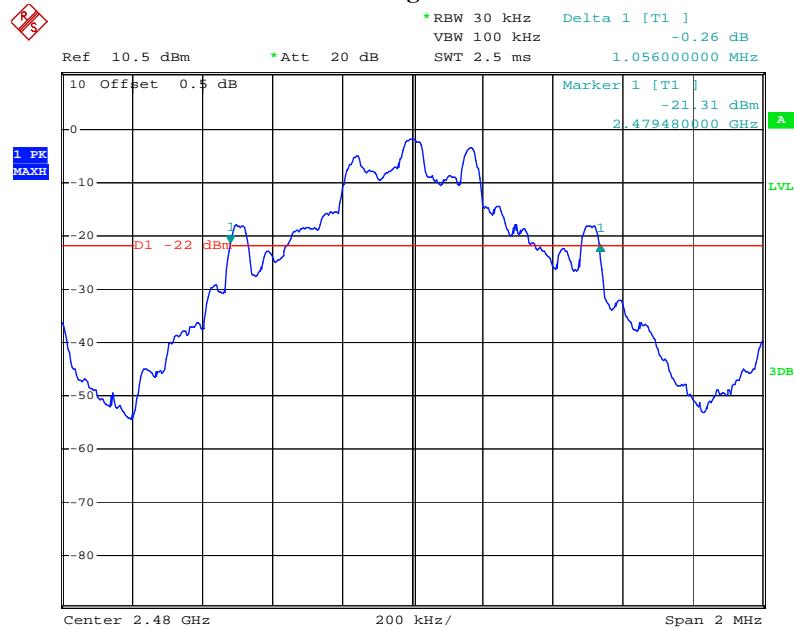
Middle Channel



Date: 17.SEP.2012 22:41:16



High Channel



Date: 17.SEP.2012 22:40:25

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5.6 §15.247(a) (1) (iii)-Number of Hopping Channels

1. Conducted Measurement
EUT was set for low, mid, high channel with modulated mode and highest RF output power.
The spectrum analyzer was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is ± 1.5 dB.
3. Environmental Conditions
Temperature 22°C
Relative Humidity 50%
Atmospheric Pressure 1019mbar
4. Test date : Chris Bi 17, 2012
Tested By : Chris Bi

Standard Requirement:

According to §15.247(a)(1)(iii), Frequency hopping systems in the 2400–2483.5 MHz band shall use at least 15 channels.

Procedures:

1. Place the EUT on the table and set it in hopping function 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 Start=2400MHz, Stop = 2483.5MHz, Span = the frequency band of operation, RBW $\geq 1\%$ of the span, VBW \geq RBW, Sweep = auto, Detector function = peak, Trace = max hold.
4. Count the quantity of peaks to get the number of hopping channels.

Test Result: Pass

Test Mode:	Hopping Mode With GFSK Modulation
-------------------	--

Frequency Range (MHz)	Number of Hopping Channels	Limit
2400-2483.5	79	≥ 15

Please refer to following tables and plots

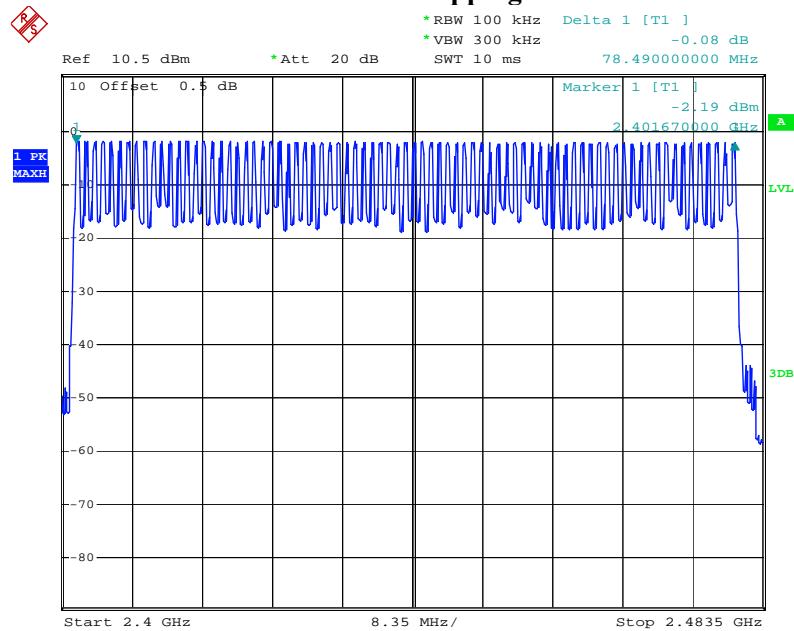
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Number of Hopping Channels



Date: 17.SEP.2012 22:58:11



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5.7 §15.247(a) (1) (iii) -Time of Occupancy (Dwell Time)

1. Conducted Measurement
EUT was set for low, mid, high channel with modulated mode and highest RF output power.
The spectrum analyzer was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is ± 1.5 dB.
3. Environmental Conditions

Temperature	22°C
Relative Humidity	50%
Atmospheric Pressure	1019mbar
4. Test date : September 17, 2012
Tested By : Chris Bi

Standard Requirement:

According to §15.247(a)(1)(iii), The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed. Frequency hopping systems may avoid or suppress transmissions on a particular hopping frequency provided that a minimum of 15 channels are used.

Procedures:

1. Place the EUT on the table and set it in transmitting mode and switch on frequency hopping function.
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 Span = zero span, centered on a hopping channel,
RBW=1MHz, VBW \geq RBW, Sweep = as necessary to capture the entire dwell time per hopping channel, Detector function = peak, Trace = max hold.
4. Calculate the time of occupancy in a period with time occupancy of a burst and quantity of bursts.

Test Result: Pass

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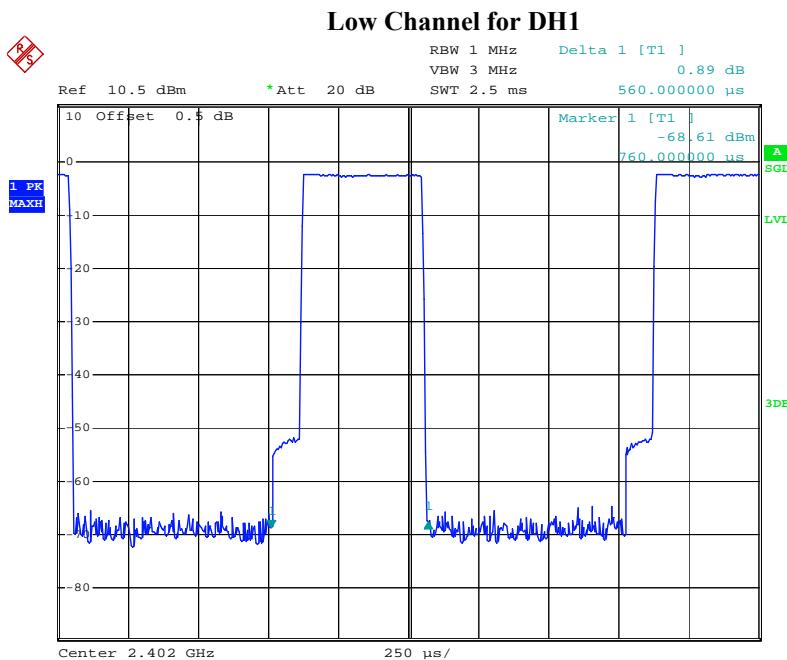
Title: RF Test Report for GSM MOBILE PHONE
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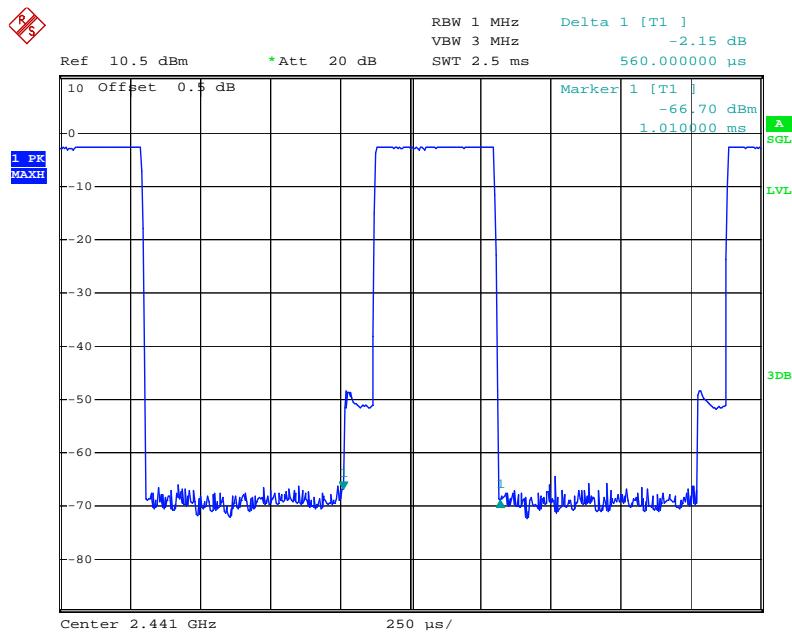
Test Mode:**Hopping Mode With GFSK Modulation**

Mode	Channel	Pulse Width (ms)	Dwell Time (s)	Limit (s)	Result
DH 1	Low	0.560	0.17920	0.4	Pass
	Middle	0.560	0.17920	0.4	Pass
	High	0.560	0.17920	0.4	Pass
<i>Note:</i> Dwell time=Pulse time (ms) \times (1600 \div 2 \div 79) \times 31.6 Second					
DH 3	Low	1.830	0.29280	0.4	Pass
	Middle	1.850	0.29600	0.4	Pass
	High	1.850	0.29600	0.4	Pass
<i>Note:</i> Dwell time=Pulse time (ms) \times (1600 \div 4 \div 79) \times 31.6 Second					
DH 5	Low	3.12	0.33280	0.4	Pass
	Middle	3.12	0.33280	0.4	Pass
	High	3.09	0.32960	0.4	Pass
<i>Note:</i> Dwell time=Pulse Time (ms) \times (1600 \div 6 \div 79) \times 31.6 Second					

Please refer to the following plots.

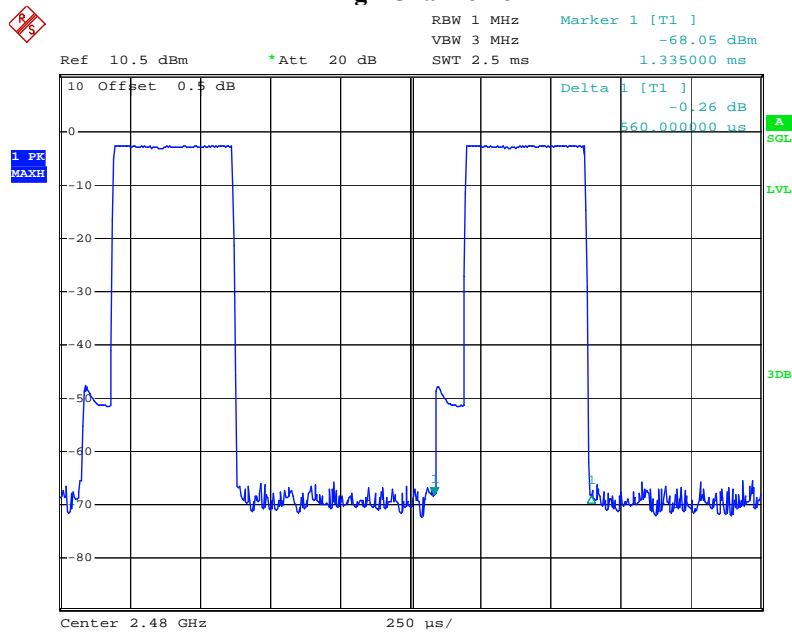


Middle Channel for DH1



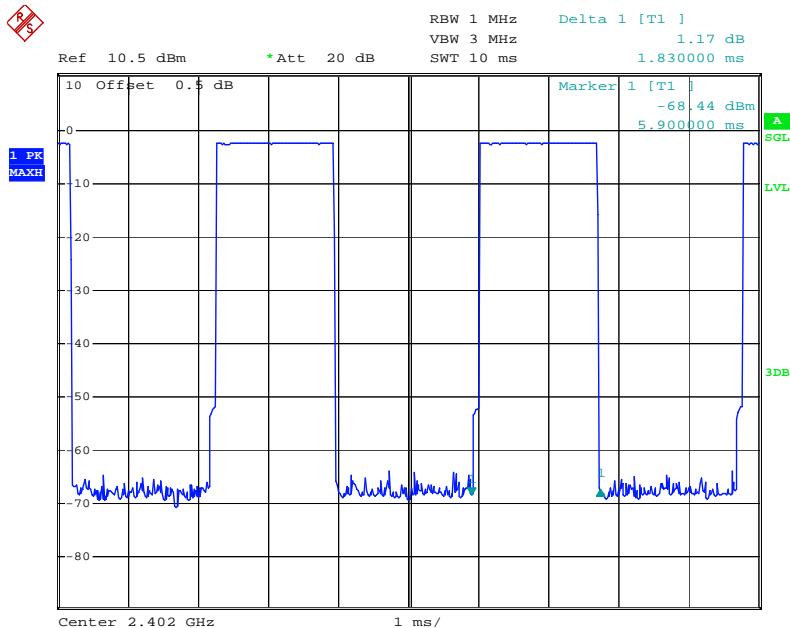
Date: 17.SEP.2012 22:53:31

High Channel for DH1



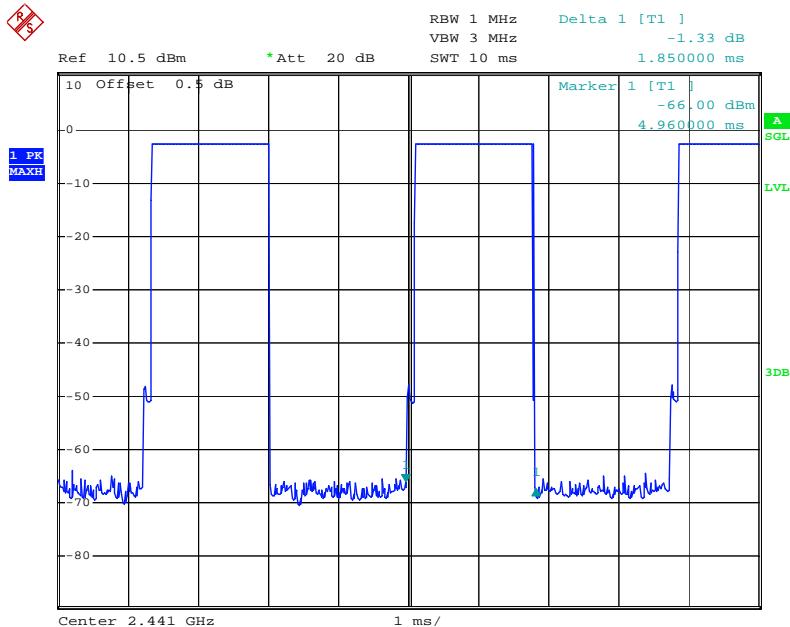
Date: 17.SEP.2012 22:53:04

Low Channel for DH3



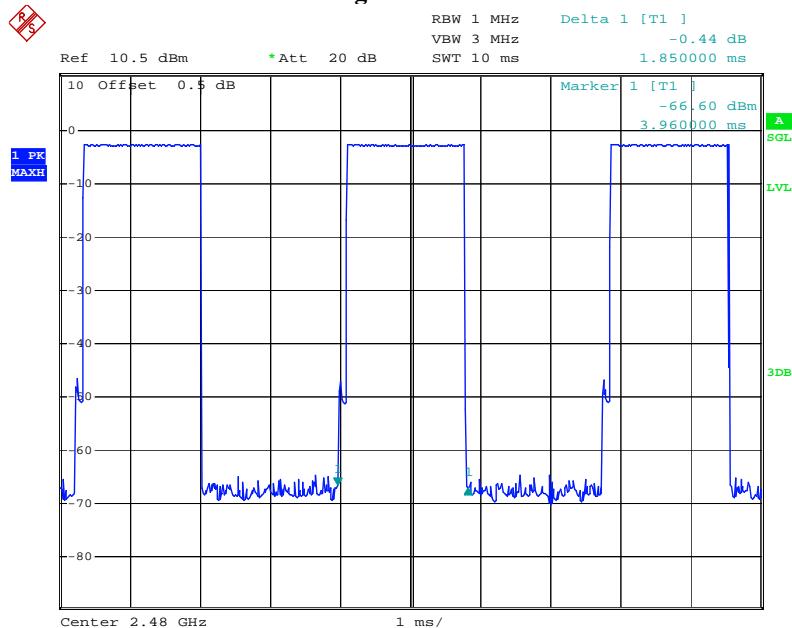
Date: 17.SEP.2012 22:49:58

Middle Channel for DH3



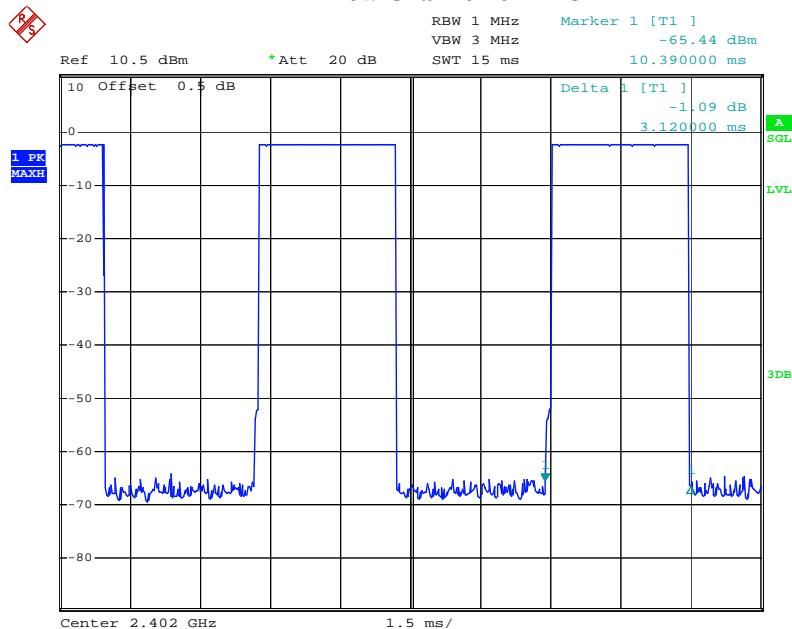
Date: 17.SEP.2012 22:50:29

High Channel for DH3



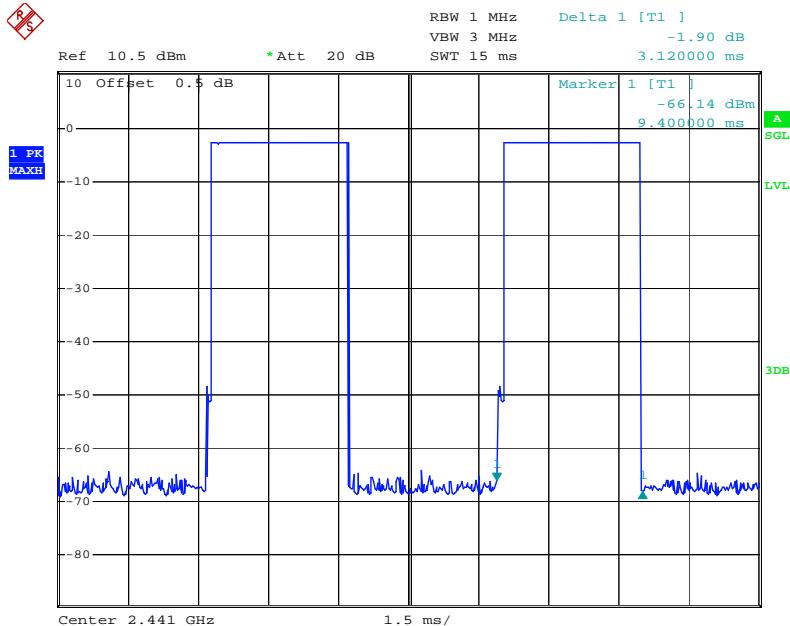
Date: 17.SEP.2012 22:51:25

Low Channel for DH5



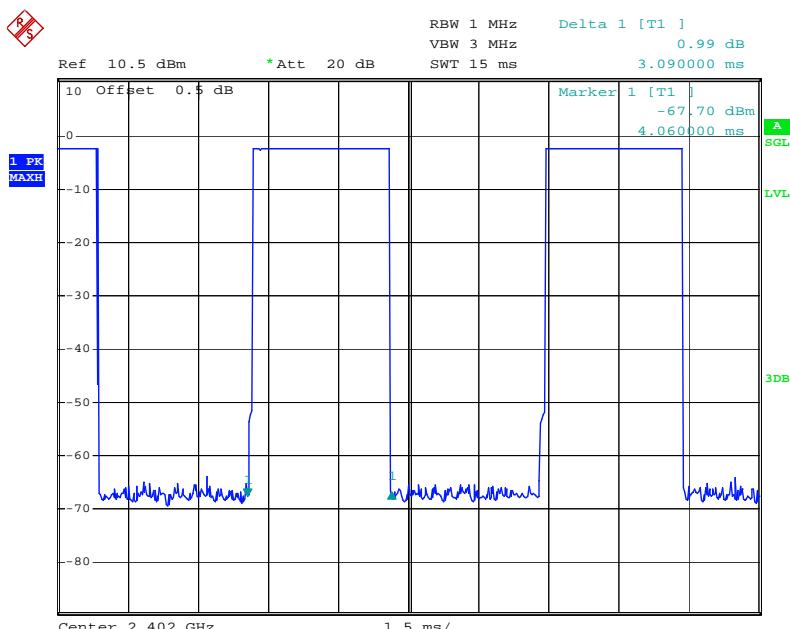
Date: 17.SEP.2012 22:48:15

Middle Channel for DH5



Date: 17.SEP.2012 22:48:46

High Channel for DH5



Date: 17.SEP.2012 22:49:23



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5.8 §15.247(b) (1) - Peak Output Power

1. Conducted Measurement
EUT was set for low, mid, high channel with modulated mode and highest RF output power.
The spectrum analyzer was connected to the antenna terminal.
2. Conducted Emissions Measurement Uncertainty
All test measurements carried out are traceable to national standards. The uncertainty of the measurement at a confidence level of approximately 95% (in the case where distributions are normal), with a coverage factor of 2, in the range 30MHz – 40GHz is $\pm 1.5\text{dB}$.
3. Environmental Conditions Temperature 22°C
 Relative Humidity 50%
 Atmospheric Pressure 1019mbar
4. Test date : September 17, 2012
Tested By : Chris Bi

Standard Requirement:

According to §15.247(b)(2), For frequency hopping systems in the 2400-2483.5 MHz band employing at least 75 non-overlapping hopping channels, and all frequency hopping systems in the 5725-5850MHz band: 1 watt. For all other frequency hopping systems in the 2400-2483.5MHz band: 0.125watts.

Procedures:

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 the spectrum analyzer as Span = approximately 5 times the 20 dB bandwidth, centered on a hopping channel, RBW > the 20 dB bandwidth of the emission being measured, $\text{VBW} \geq \text{RBW}$, Sweep=auto, Detector function=peak, Trace = max hold.
4. Then set the EUT to transmit at low, middle and high channel and measure the conducted output power separately.

Test Result: Pass



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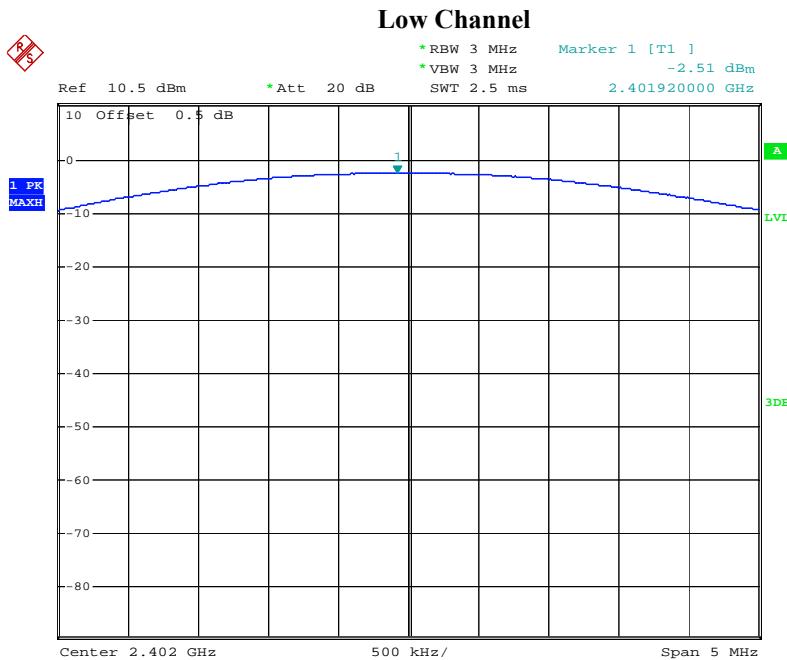
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Test Mode: GFSK Transmitting

Channel	Channel frequency (MHz)	Peak output power (dBm)	Power output (mW)	Limit (mW)
Low channel	2402	-2.51	0.561	125
Middle channel	2441	-2.75	0.527	125
High channel	2480	-2.73	0.533	125

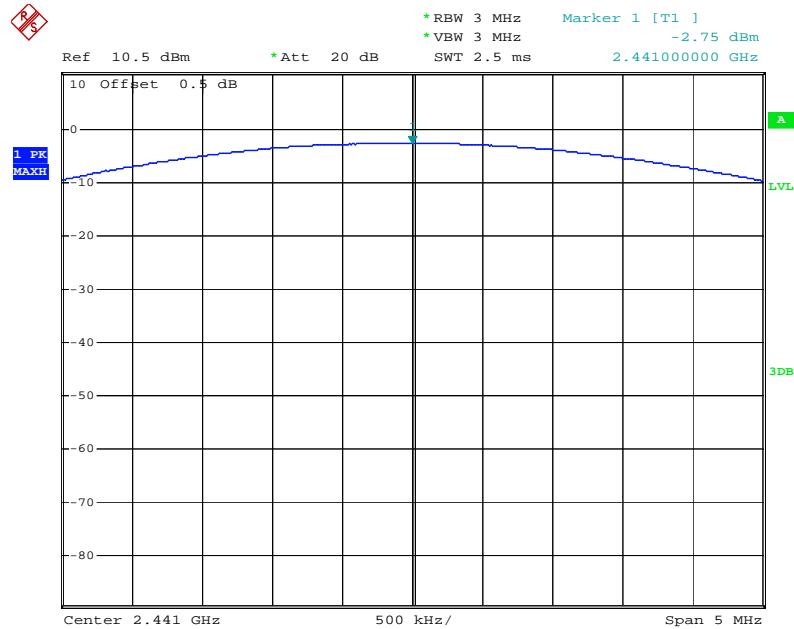
Please refer to the following plots.

Note: The data above was tested in conducted mode.



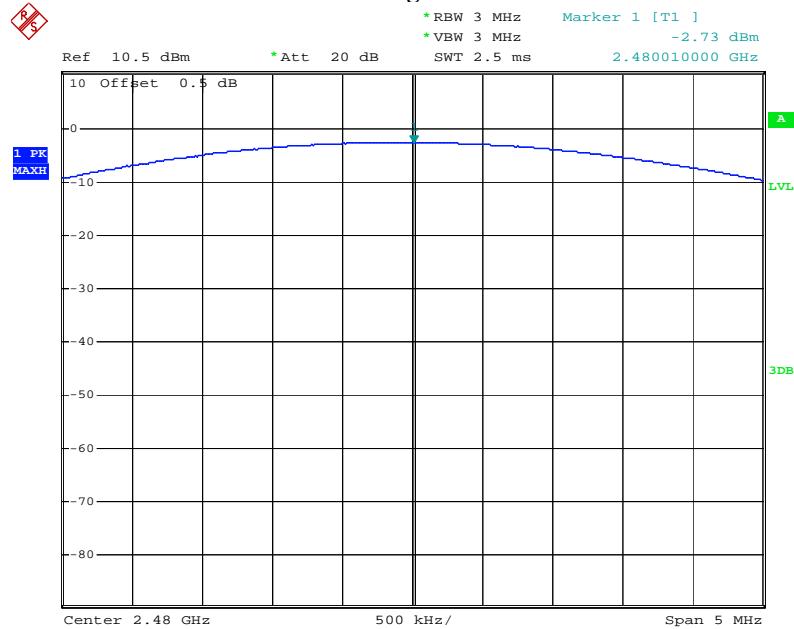
Date: 17.SEP.2012 22:33:44

Middle Channel



Date: 17.SEP.2012 22:33:09

High Channel



Date: 17.SEP.2012 22:33:27

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5.9 §15.247(d) - Band Edge

Standard Requirement:

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

Procedures:

1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
2. Position the EUT without connection to measurement instrument. Put it on the Rotated table and turn on the EUT and make it operate in transmitting mode. Then set it to Low Channel and High Channel within its operating range, and make sure the instrument is operated in its linear range.
3. Set both RBW and VBW of spectrum analyzer to 100 kHz with a convenient frequency span including 100kHz bandwidth from band edge, for Radiated emissions restricted band RBW=1MHz, VBW=3MHz.
4. Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.
5. Repeat above procedures until all measured frequencies were complete.

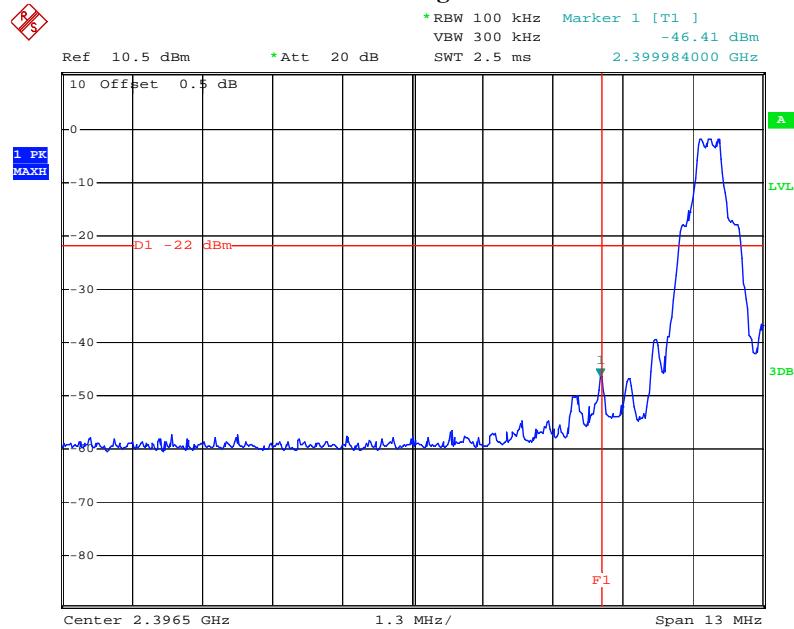
Test Result: Pass

Test Mode:	GFSK Transmitting
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Frequency (MHz)	Delta Peak to Band Emission (dBc)	Limit (dBc)
2399.984	-46.41	20
2483.956	-55.26	20

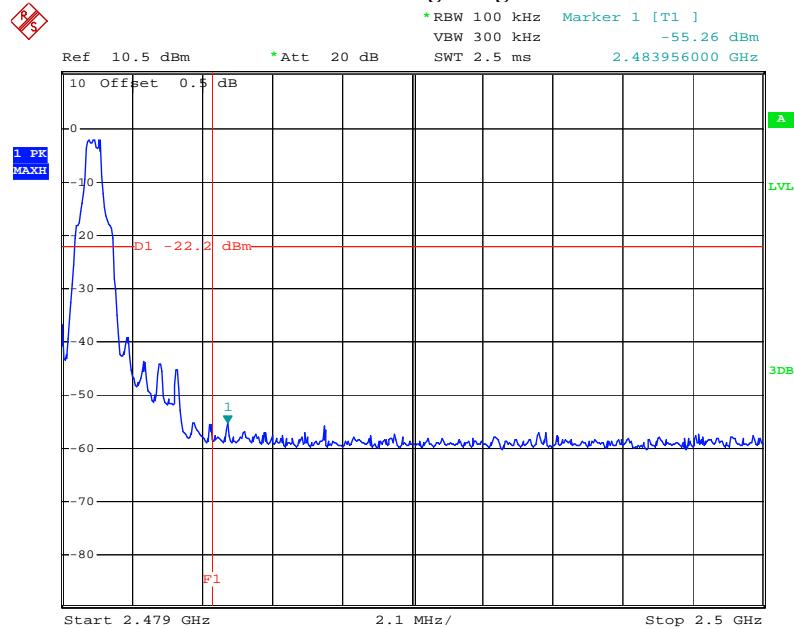
Note: The point fall into the strict band was recorded in FCC 15.209, please refer to the restrict band testing.

Band Edge: Left Side



Date: 17.SEP.2012 22:36:26

Band Edge: Right Side



Date: 17.SEP.2012 22:39:13

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Annex A. TEST INSTRUMENT & METHOD

Annex A.i. TEST INSTRUMENTATION & GENERAL PROCEDURES

Instrument	Model	Serial #	Calibration Date	Calibration Due Date
AC Line Conducted Emissions				
R&S EMI Test Receiver	ESPI3	101216	08/26/2012	08/25/2013
Com-Power LISN	LI-115	241090	05/26/2012	05/25/2013
Com-Power Transient Limiter	LIT-153	531021	05/26/2012	05/25/2013
Universal Radio Communication Tester	CMU200	104031	03/01/2012	02/28/2013
A- INFOMW Antenna (1 ~18GHz)	JXTXLB-10180	J2031081120 092	06/25/2012	06/24/2013
Radiated Emissions				
Hp Spectrum Analyzer	8563E	3821A09023	01/10/2012	01/09/2013
R&S EMI Receiver	ESPI3	101216	08/26/2012	08/25/2013
Antenna (30MHz~6GHz)	JB6	A121411	12/28/2011	12/27/2012
ETS-Lindgren Antenna(1 ~18GHz)	3115	N/A	10/04/2011	10/03/2012
A- INFOMW Antenna (1 ~18GHz)	JXTXLB-10180	J2031081120 092	06/25/2012	06/24/2013
Horn Antenna (18~40GHz)	AH-840	N/A	07/23/2012	07/22/2013
Microwave Pre-Amp (18~40GHz)	PA-840	N/A	Every 2000 Hours	
Hp Agilent Pre-Amplifier	8447F	1937A01160	05/25/2012	05/24/2013
MITEQ Pre-Amplifier (0.1 ~ 18GHz)	AMF-7D-00101800-30-10P	1451710	05/26/2012	05/25/2013
Universal Radio Communication Tester	CMU200	104031	03/01/2012	02/28/2013
Chamber	3m	N/A	04/13/2012	04/12/2013



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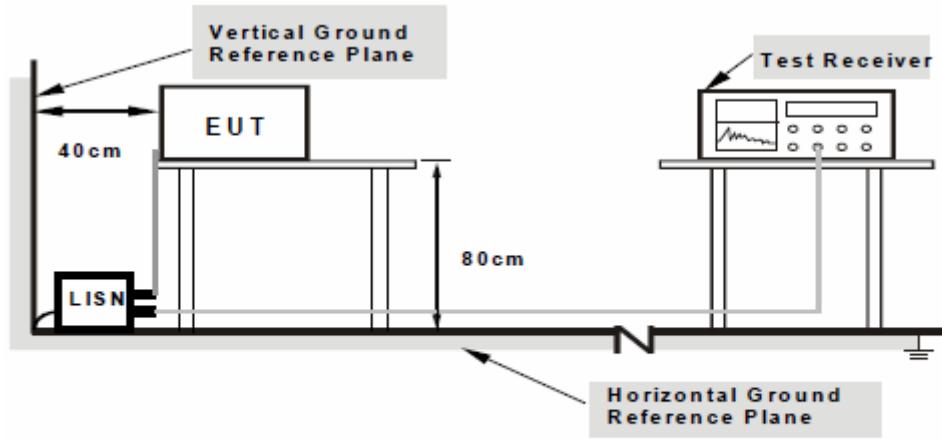
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Annex A.ii. CONDUCTED EMISSIONS TEST DESCRIPTION

Test Set-up

1. The EUT and supporting equipment were set up in accordance with the requirements of the standard on top of a 1.5m x 1m x 0.8m high, non-metallic table, as shown in [Annex B](#).
2. The power supply for the EUT was fed through a $50\Omega/50\mu\text{H}$ EUT LISN, connected to filtered mains.
3. The RF OUT of the EUT LISN was connected to the EMI test receiver via a low-loss coaxial cable.
4. All other supporting equipments were powered separately from another main supply.



For the actual test configuration, please refer to the related item – Photographs of the Test Configuration1.

Test Method

1. The EUT was switched on and allowed to warm up to its normal operating condition.
2. A scan was made on the NEUTRAL line (for AC mains) or Earth line (for DC power) over the required frequency range using an EMI test receiver.
3. High peaks, relative to the limit line, were then selected.
4. The EMI test receiver was then tuned to the selected frequencies and the necessary measurements made with a receiver bandwidth setting of 10 kHz. For FCC tests, only Quasi-peak measurements were made; while for CISPR/EN tests, both Quasi-peak and Average measurements were made.
5. Steps 2 to 4 were then repeated for the LIVE line (for AC mains) or DC line (for DC power).

Description of Conducted Emission Program

This EMC Measurement software run LabView automation software and offers a common user interface for electromagnetic interference (EMI) measurements. This software is a modern and powerful tool for controlling and monitoring EMI test receivers and EMC test systems. It guarantees reliable collection, evaluation, and documentation of measurement results. Basically, this program will run a pre-scan measurement before it proceeds with the final measurement. The pre-scan routine will run the common scan range from 150 kHz to 30 MHz; the program will first start a peak and average scan on selectable measurement time and step size. After the program complete the pre-scan, this program will perform the Quasi Peak and Average measurement, based on the pre-scan peak data reduction result.



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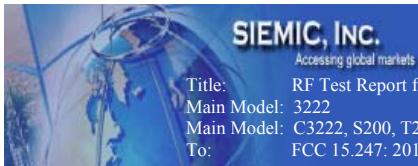
Sample Calculation Example

At 20 MHz limit = 250 μ V = 47.96 dB μ V

Transducer factor of LISN, pulse limiter & cable loss at 20 MHz = 11.20 dB

Q-P reading obtained directly from EMI Receiver = 40.00 dB μ V
(Calibrated for system losses)

Therefore, Q-P margin = 47.96 – 40.00 = 7.96 i.e. **7.96 dB below limit**



Annex A. iii. RADIATED EMISSIONS TEST DESCRIPTION

Limit

1. 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 (mV/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 above emission table, the tighter limit applies at the band edges.

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

EUT Characterisation

EUT characterisation, over the frequency range from 30MHz to 10th Harmonic, was done in order to minimise radiated emissions testing time while still maintaining high confidence in the test results.

The EUT was placed in the chamber, at a height of about 0.8m on a turntable. Its radiated emissions frequency profile was observed, using a spectrum analyzer / receiver with the appropriate broadband antenna placed 3m away from the EUT. Radiated emissions from the EUT were maximised by rotating the turntable manually, changing the antenna polarisation and manipulating the EUT cables while observing the frequency profile on the spectrum analyzer / receiver. Frequency points at which maximum emissions occurred, clock frequencies and operating frequencies were then noted for the formal radiated emissions test at the Open Area Test Site (OATS) or 3m EMC chamber.



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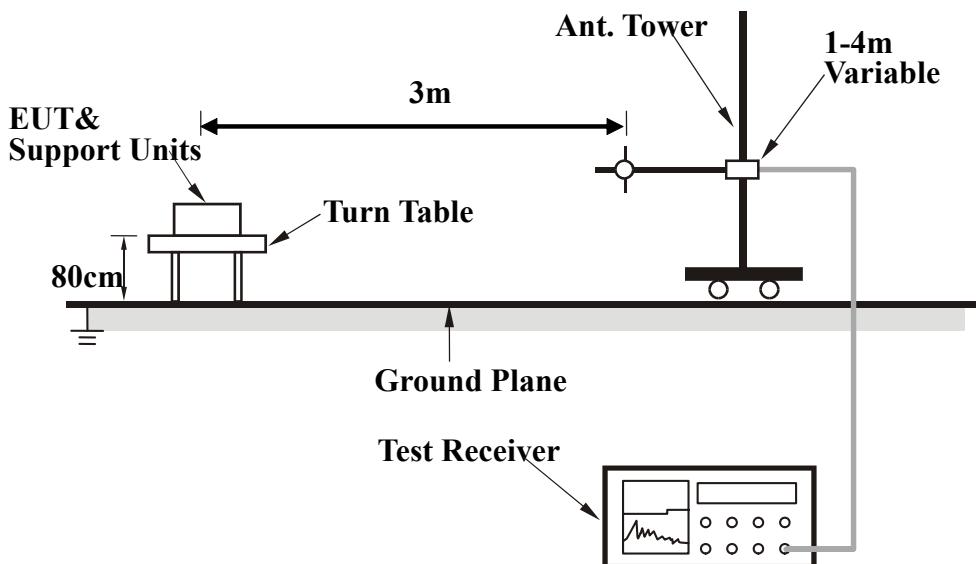
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Test Set-up

1. The EUT and supporting equipment were set up in accordance with the requirements of the standard on top of a 1.5m X 1.0m X 0.8m high, non-metallic table.
2. The filtered power supply for the EUT and supporting equipment were tapped from the appropriate power sockets located on the turntable.
3. The relevant broadband antenna was set at the required test distance away from the EUT and supporting equipment boundary.



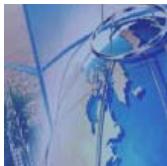
Test Method

The following procedure was performed to determine the maximum emission axis of EUT:

1. With the receiving antenna is H polarization, rotate the EUT in turns with three orthogonal axes to determine the axis of maximum emission.
2. With the receiving antenna is V polarization, rotate the EUT in turns with three orthogonal axes to determine the axis of maximum emission.
3. Compare the results derived from above two steps. So, the axis of maximum emission from EUT was determined and the configuration was used to perform the final measurement.

Final Radiated Emission Measurement

1. Setup the configuration according to figure 1. Turn on EUT and make sure that it is in normal function.
2. For emission frequencies measured below 1 GHz, a pre-scan is performed in a shielded chamber to determine the accurate frequencies of higher emissions will be checked on an open test site. As the same purpose, for emission frequencies measured above 1 GHz, a pre-scan also be performed with a 1 meter measuring distance before final test.
3. For emission frequencies measured below and above 1 GHz, set the spectrum analyzer on a 100 kHz and 1 MHz resolution bandwidth respectively for each frequency measured in step 2.
4. The search antenna is to be raised and lowered over a range from 1 to 4 meters in horizontally polarized orientation. Position the highness when the highest value is indicated on spectrum analyzer, then change the orientation of EUT on test table over a range from 0 ° to 360 ° with a speed as slow as possible, and keep the azimuth that highest emission is indicated on the spectrum analyzer. Vary the antenna position again and record the highest value as a final reading.
5. Repeat step 4 until all frequencies need to be measured was complete.
6. Repeat step 5 with search antenna in vertical polarized orientations.

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During the radiated emission test, the Spectrum Analyzer was set with the following configurations:

Frequency Band (MHz)	Function	Resolution bandwidth	Video Bandwidth
30 to 1000	Peak	100 kHz	100 kHz
Above 1000	Peak	1 MHz	1 MHz
	Average	1 MHz	10 Hz

Description of Radiated Emissions Program

This EMC Measurement software run LabView automation software and offers a common user interface for electromagnetic interference (EMI) measurements. This software is a modern and powerful tool for controlling and monitoring EMI test receivers and EMC test systems. It guarantees reliable collection, evaluation, and documentation of measurement results. Basically, this program will run a pre-scan measurement before it proceeds with the final measurement. The pre-scan routine will run the scan on four different antenna heights, 2 antenna polarity, and 360 degrees table rotation. For example, the program was set to run 30 MHz to 1 GHz scan; the program will first start from a meter antenna height and divide the 30 MHz to 1 GHz into 10 separate parts of maximum hold sweeps. Each parts of maximum hold sweep, the program will collect the data from 0 degree to 360 degrees table rotation. After the program complete the 1m scan, the antenna continues to rise to 2m and continue the scan. The step will repeated for all specified antenna height and polarity. This program will perform the Quasi Peak measurement after the signal maximization process and pre-scan routine. The final measurement will be base on the pre-scan data reduction result.

Sample Calculation Example

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. For the limit is employed average value, therefore the peak value can be transferred to average value by subtracting the duty factor. The basic equation with a sample calculation is as follows:

$$\text{Peak} = \text{Reading} + \text{Corrected Factor}$$

where

$$\text{Corr. Factor} = \text{Antenna Factor} + \text{Cable Factor} - \text{Amplifier Gain (if any)}$$

And the average value is

$$\text{Average} = \text{Peak Value} + \text{Duty Factor or}$$
$$\text{Set RBW} = 1\text{MHz}, \text{VBW} = 10\text{Hz}.$$

Note:

If the measured frequencies are fall in the restricted frequency band, the limit employed must be quasi peak value when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function.



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Annex B. EUT AND TEST SETUP PHOTOGRAPHS

Please see attachment

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Annex C. TEST SETUP AND SUPPORTING EQUIPMENT

EUT TEST CONDITIONS

Annex C. i. SUPPORTING EQUIPMENT DESCRIPTION

The following is a description of supporting equipment and details of cables used with the EUT.

Manufacturer	Equipment Description (Including Brand Name)	Model	Calibration Date	Calibration Due Date
A-INFOMW	Horn Antenna	JXTXLB-10180	06/25/2012	06/24/2013
Rohde & Schwarz	Universal Radio Communication Tester	CMU200	03/01/2012	02/28/2013



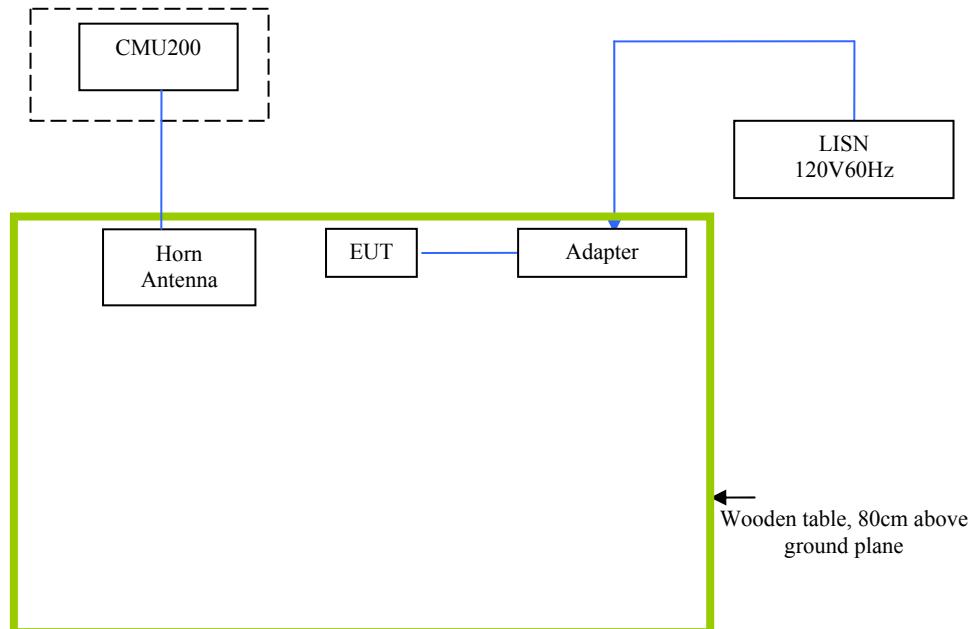
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Block Configuration Diagram for AC Line Conducted Emissions





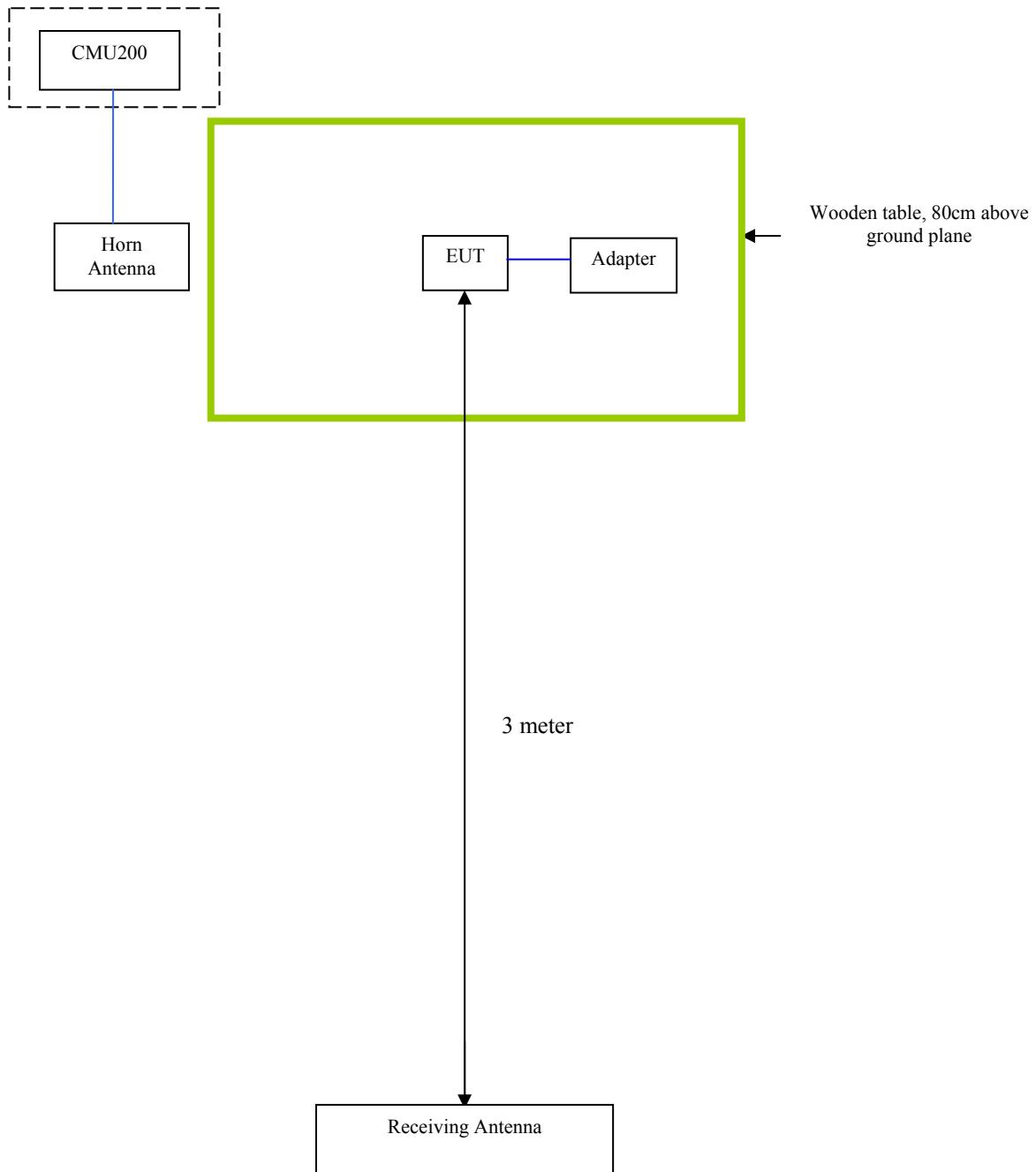
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Block Configuration Diagram for Radiated Emissions



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Annex C.ii. EUT OPERATING CONDITIONS

The following is the description of how the EUT is exercised during testing.

Test	Description Of Operation
Emissions Testing	The EUT was continuously transmitting to stimulate the worst case.



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Annex D. USER MANUAL / BLOCK DIAGRAM / SCHEMATICS / PART LIST

Please see attachment



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Annex E. DECLARATION OF SIMILARITY



P. LACHMAN GROUP

To: SIEMIC , 775 Montague Expressway , Milpitas, CA 95035 USA

Declaration letter

Dear Sir,

For our business issue and marketing requirement, we would like to list different models numbers on the FCC certificates and reports, as following:

Model No.: 3222, C3222, S200, T200

We declare that there is no electrical change has been made to the equipment that alters the compliance characteristics. The difference of these different models is for different Color. Please kindly handle on the project.

Thank you!

Signature:

Printed name: Bhavish. Lachman