

# Test report

**402832-3TRFWL**

Date of issue: August 28, 2020

Applicant:  
Stryker Instruments

Product:  
SurgiCount®+

Model under Test:  
SurgiCount®+ Cradle: 0694-002-002

Tested with  
SurgiCount®+ Tablet: 0794-001-010  
SurgiCount®+ Reader: 0694-002-005

FCC ID: Q9R-0042

Specifications:

- ◆ **FCC 47 CFR Part 15, Subpart C – §15.225**  
Operation within the band 13.110-14.010 MHz
- ◆ **RSS-210, Issue 10, December 2019**  
License-Exempt Radio Apparatus: Category I Equipment
- ◆ **RSS-Gen, Issue 5, Amendment 1, March 2019**  
General Requirements for Compliance of Radio Apparatus

**Test location**

|                 |  |
|-----------------|--|
| Company name    | Nemko USA, Inc.  |
| Address         | 2210 Faraday Ave, Suite 150                                      |
| City            | Carlsbad   |
| Province        | California   |
| Postal code     | 92008  |
| Country         | USA  |
| Telephone       | +1 760 444 3500  |
| Website         | <a href="http://www.nemko.com">www.nemko.com</a>                 |
| FCC Site Number | Test Firm Registration Number: 392943 Designation Number: US5058 |
| ISED Test Site  | 2040B-3  |

|                    |   |
|--------------------|---|
| Tested by          | David Hewitt, EMC Specialist  |
| Reviewed by        | James Cunningham, EMC/MIL/WL Supervisor   |
| Review date        | August 28, 2020   |
| Reviewer signature |  |

**Limits of responsibility**

Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report. This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contained in this report are within Nemko USA's ISO/IEC 17025 accreditation. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the U.S. Government.

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## Section 1. Report summary

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### 1.1 Applicant and manufacturer

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|                 |                     |
|-----------------|---------------------|
| Company name    | Stryker Instruments |
| Address         | 1941 Stryker Way    |
| City            | Portage             |
| State           | MI                  |
| Postal/Zip code | 49002               |
| Country         | USA                 |

### 1.2 Test specifications

---

|  |  |
|--|--|
| FCC 47 CFR Part 15, Subpart C, Clause 15.225 | Operation within the band 13.110-14.010 MHz            |
| RSS-210, Issue 10                            | License-Exempt Radio Apparatus: Category I Equipment   |
| RSS-Gen, Issue 5, Amendment 1, March 2019    | General Requirements for Compliance of Radio Apparatus |

### 1.3 Test methods

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|                  |  |
|------------------|--|
| ANSI C64.3-2014  | American National Standard for Methods of Measurement of Radio- Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz |
| ANSI C63.10-2013 | American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices   |

### 1.4 Statement of compliance

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In the configuration tested, the EUT was found compliant.

Testing was performed against all relevant requirements of the test standard. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See "Summary of test results" for full details.

### 1.5 Exclusions

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None

### 1.6 Test report revision history

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| Revision #    | Details of changes made to test report |
|---------------|--|
| 402832-3TRFWL | Original report issued                 |

## Section 2. Summary of test results

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### 2.1 FCC Part 15 Subpart C, general requirements test results

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| Part                 | Test description          | Verdict |
|----------------------|---------------------------|---------|
| §15.207(a)           | Conducted limits          | Pass    |
| §15.31(e)            | Variation of power source | Pass    |
| §15.203 <sup>1</sup> | Antenna requirement       | Pass    |
| §15.215              | 20 dB bandwidth           | Pass    |

Notes: <sup>1</sup> The Antenna is internal to device or with unique antenna coupling.

### 2.2 FCC Part 15 Subpart C, intentional radiators test results

---

| Part       | Test description  | Verdict |
|------------|---|---------|
| §15.225(a) | Field strength within 13.553–13.567 MHz band                        | Pass    |
| §15.225(b) | Field strength within 13.410–13.553 MHz and 13.567–13.710 MHz bands | Pass    |
| §15.225(c) | Field strength within 13.110–13.410 MHz and 13.710–14.010 MHz bands | Pass    |
| §15.225(d) | Field strength outside 13.110–14.010 MHz band                       | Pass    |
| §15.225(e) | Frequency tolerance of carrier signal                               | Pass    |

Notes: None

### 2.3 IC RSS-GEN, Issue 4, test results

---

| Part               | Test description   | Verdict        |
|--------------------|--|----------------|
| 7.1.2 <sup>1</sup> | Receiver radiated emission limits  | Not applicable |
| 7.1.3 <sup>1</sup> | Receiver conducted emission limits                                       | Not applicable |
| 8.8                | Power Line Conducted Emissions Limits for License-Exempt Radio Apparatus | Pass           |
| 8.10               | Restricted Frequency Bands   | Pass           |
| 6.6                | Occupied bandwidth   | Pass           |
| 6.11               | Transmitter frequency stability  | Pass           |

Note: <sup>1</sup> According to sections 5.2 and 5.3 of RSS-Gen, Issue 4, the EUT does not have a stand-alone receiver nor scanner receiver and is therefore exempt from receiver requirements.

### 2.4 IC RSS-210, Issue 9, test results

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| Part    | Test description   | Verdict |
|---------|--|---------|
| B.6 (a) | The field strength within the band 13.553–13.567 MHz.                            | Pass    |
| B.6 (b) | The field strength within the bands 13.410–13.553 MHz and 13.567–13.710 MHz      | Pass    |
| B.6 (c) | The field strength within the bands 13.110–13.410 MHz and 13.710–14.010 MHz.     | Pass    |
| B.6 (d) | The field strength outside the band 13.110–14.010 MHz.                           | Pass    |
| B.6     | Carrier frequency stability shall be maintained to $\pm 0.01\%$ ( $\pm 100$ ppm) | Pass    |

Note: None.

## Section 3. Equipment under test (EUT) details

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### 3.1 Sample information

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|                        |               |
|------------------------|---------------|
| Receipt date           | July 20, 2020 |
| Nemko sample ID number | NEx: 402832   |

### 3.2 EUT information

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|               |  |
|---------------|--|
| Product name  | SurgiCount®+   |
| Model         | SurgiCount®+ Cradle: 0694-002-002<br>SurgiCount®+ Tablet: 0794-001-010<br>SurgiCount®+ Reader: 0694-002-005                                      |
| Model variant | N/A  |
| Serial number | SurgiCount®+ Cradle Serial Number: 208641<br>SurgiCount®+ Tablet Serial Number: GK49CE00043<br>SurgiCount®+ Reader Serial Number: 19343520100167 |
| FCC ID        | Q9R-0042   |

### 3.3 Technical information

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|                                      |   |
|--------------------------------------|---|
| All used IC test site(s) Reg. number | 2040B-3   |
| RSS number and Issue number          | RSS-210, Issue 10, December 2019  |
| Frequency band                       | 13.11 – 14.01 MHz   |
| Frequency Min (MHz)                  | 13.56 MHz   |
| Frequency Max (MHz)                  | 13.56 MHz   |
| Measured RF power Max (W), EIRP      | 00.0084 W   |
| Field strength, Units @ distance     | 44.51 dB $\mu$ V/m @ 3m   |
| Measured BW (kHz) (20 dB)            | 306 Hz  |
| Measured BW (kHz) (99%)              | 10.467 kHz  |
| Power requirements                   | 120 V <sub>AC</sub> , 60Hz  |
| Antenna information                  | The EUT uses a unique antenna coupling/ non-detachable antenna to the intentional radiator. |

### 3.4 Product description and theory of operation

The SurgiCount®+ system is indicated for use in counting, displaying and recording the number of RFID-tagged surgical sponges, laparotomy sponges and towels used during surgical procedures, and providing a non-invasive means of locating retained RFID-tagged surgical sponges, towels and other tagged items within an operating room.

### 3.5 EUT exercise details

System is tested with accompanying tablet and RFID scanner attached to cradle. Tablet is connected to a wireless router via Wi-Fi, while the tablet is continuously pinged through the Wi-Fi network; the RFID scanner is connected to the EUT via BLE and is continually reading a passive RF tag.

### 3.6 EUT setup diagram

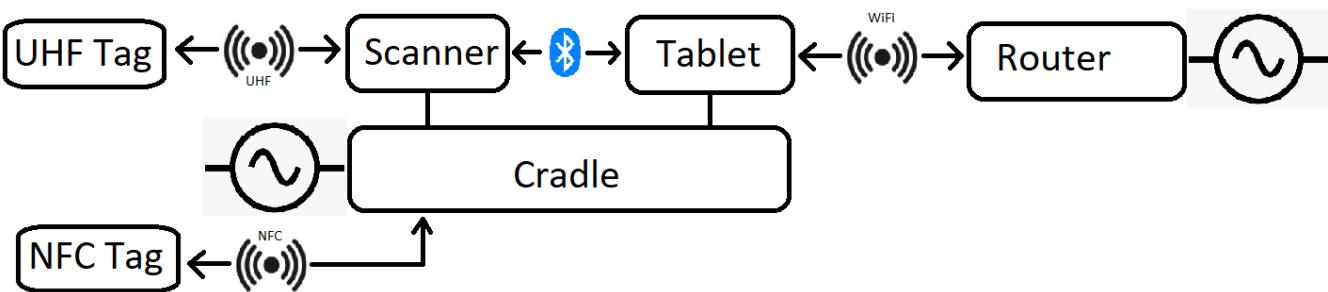


Figure 3.6-1: EUT setup diagram

### 3.7 EUT sub assemblies

Table 3.7-1: EUT sub assemblies

| Description         | Brand name | Model/Part number | Serial number  |
|---------------------|------------|-------------------|----------------|
| SurgiCount®+ Cradle | Stryker    | 0694-002-002      | 208641         |
| SurgiCount®+ Tablet | Stryker    | 0794-001-010      | GK49CE00043    |
| SurgiCount®+ Reader | Stryker    | 0694-002-005      | 19343520100167 |
| AC Power Cable      | Stryker    | 700001044827      | --             |

Table 3.7-2: Support equipment

| Description     | Brand name | Model/Part number | Serial number | Rev. |
|-----------------|------------|-------------------|---------------|------|
| Wireless router | Asus       | RT-N66U           | E4IA08020580  | --   |

## Section 4. Engineering considerations

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### 4.1 Modifications incorporated in the EUT

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There were no modifications performed to the EUT during this assessment.

### 4.2 Technical judgment

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None

### 4.3 Deviations from laboratory tests procedures

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No deviations were made from laboratory procedures.

## Section 5. Test conditions

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### 5.1 Atmospheric conditions

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|                   |               |
|-------------------|---------------|
| Temperature       | 15–30 °C      |
| Relative humidity | 20–75 %       |
| Air pressure      | 860–1060 mbar |

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

### 5.2 Power supply range

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The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages  $\pm 5\%$ , for which the equipment was designed.

## Section 6. Measurement uncertainty

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### 6.1 Uncertainty of measurement

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Measurement uncertainty budgets for the tests are detailed below. Measurement uncertainty calculations assume a coverage factor of  $K = 2$  with 95% certainty.

| Test name                         | Measurement uncertainty, dB |
|-----------------------------------|-----------------------------|
| All antenna port measurements     | 0.55                        |
| Conducted spurious emissions      | 1.13                        |
| Radiated spurious emissions       | 3.78                        |
| AC power line conducted emissions | 1.38                        |

## Section 7. Test Data

### 7.1 Field strength of spurious emissions

#### 7.1.1 Definitions and limits

**FCC:**

- a. The field strength of any emissions within the band 13.553-13.567 MHz shall not exceed 15,848 microvolts/meter at 30 meters.
- b. Within the bands 13.410-13.553 MHz and 13.567-13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.
- c. Within the bands 13.110-13.410 MHz and 13.710-14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.
- d. The field strength of any emissions appearing outside of the 13.110-14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.

**ISED:**

The field strength of any emission shall not exceed the following limits:

- a. 15.848 mV/m (84 dB $\mu$ V/m) at 30 m, within the band 13.553-13.567 MHz;
- b. 334  $\mu$ V/m (50.5 dB $\mu$ V/m) at 30 m, within the bands 13.410-13.553 MHz and 13.567-13.710 MHz;
- c. 106  $\mu$ V/m (40.5 dB $\mu$ V/m) at 30 m, within the bands 13.110-13.410 MHz and 13.710-14.010 MHz; and
- d. RSS-Gen general field strength limits for frequencies outside the band 13.110-14.010 MHz.

**Table 7.1-1: FCC §15.209 and RSS-Gen – Radiated emission limits**

| Frequency,<br>MHz | Field strength of emissions |                                   | Measurement distance, m |
|-------------------|-----------------------------|-----------------------------------|-------------------------|
|                   | $\mu$ V/m                   | dB $\mu$ V/m                      |                         |
| 0.009–0.490       | 2400/F                      | 67.6 – 20 × log <sub>10</sub> (F) | 300                     |
| 0.490–1.705       | 24000/F                     | 87.6 – 20 × log <sub>10</sub> (F) | 30                      |
| 1.705–30.0        | 30                          | 29.5                              | 30                      |
| 30–88             | 100                         | 40.0                              | 3                       |
| 88–216            | 150                         | 43.5                              | 3                       |
| 216–960           | 200                         | 46.0                              | 3                       |
| above 960         | 500                         | 54.0                              | 3                       |

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

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test

**Table 7.1-2: IC restricted frequency bands**

| MHz             | MHz                 | MHz           | GHz         |
|-----------------|---------------------|---------------|-------------|
| 0.090–0.110     | 12.51975–12.52025   | 399.9–410     | 5.35–5.46   |
| 2.1735–2.1905   | 12.57675–12.57725   | 608–614       | 7.25–7.75   |
| 3.020–3.026     | 13.36–13.41         | 960–1427      | 8.025–8.5   |
| 4.125–4.128     | 16.42–16.423        | 1435–1626.5   | 9.0–9.2     |
| 4.17725–4.17775 | 16.69475–16.69525   | 1645.5–1646.5 | 9.3–9.5     |
| 4.20725–4.20775 | 16.80425–16.80475   | 1660–1710     | 10.6–12.7   |
| 5.677–5.683     | 25.5–25.67          | 1718.8–1722.2 | 13.25–13.4  |
| 6.215–6.218     | 37.5–38.25          | 2200–2300     | 14.47–14.5  |
| 6.26775–6.26825 | 73–74.6             | 2310–2390     | 15.35–16.2  |
| 6.31175–6.31225 | 74.8–75.2           | 2655–2900     | 17.7–21.4   |
| 8.291–8.294     | 108–138             | 3260–3267     | 22.01–23.12 |
| 8.362–8.366     | 156.52475–156.52525 | 3332–3339     | 23.6–24.0   |
| 8.37625–8.38675 | 156.7–156.9         | 3345.8–3358   | 31.2–31.8   |
| 8.41425–8.41475 | 240–285             | 3500–4400     | 36.43–36.5  |
| 12.29–12.293    | 322–335.4           | 4500–5150     | Above 38.6  |

Note: Certain frequency bands listed in Table 8.3-2 and above 38.6 GHz are designated for low-power license-exempt applications. These frequency bands and the requirements that apply to the devices are set out in this Standard

**Table 7.1-3:** FCC restricted frequency bands

| MHz               | MHz                 | MHz           | GHz         |
|-------------------|---------------------|---------------|-------------|
| 0.090–0.110       | 16.42–16.423        | 399.9–410     | 4.5–5.15    |
| 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       | 156.52475–156.52525 | 2483.5–2500   | 17.7–21.4   |
| 8.37625–8.38675   | 156.7–156.9         | 2690–2900     | 22.01–23.12 |
| 8.41425–8.41475   | 162.0125–167.17     | 3260–3267     | 23.6–24.0   |
| 12.29–12.293      | 167.72–173.2        | 3332–3339     | 31.2–31.8   |
| 12.51975–12.52025 | 240–285             | 3345.8–3358   | 36.43–36.5  |
| 12.57675–12.57725 | 322–335.4           | 3600–4400     | Above 38.6  |
| 13.36–13.41       |                     |               |             |

#### 7.1.2 Test summary

|               |   |                   |           |
|---------------|---|-------------------|-----------|
| Verdict       | Pass  |                   |           |
| Test date     | July 23, 2020   | Temperature       | 22 °C     |
| Test engineer | David Hewitt, EMC Specialist                          | Air pressure      | 1004 mbar |
| Test location | 10m semi anechoic chamber<br>3m semi anechoic chamber | Relative humidity | 58 %      |

#### 7.1.3 Observations, settings and special notes

In order to investigate the spectrum from the lowest radio frequency signal generated in the device to the tenth harmonic of the highest fundamental frequency, per 47 CFR § 15.33 (a)-1, radiated emissions were measured from 9 kHz to 150 MHz.

#### 7.1.4 Setup details

Spectrum analyzer settings for radiated measurements within restricted bands from 9 kHz to 30 MHz:

|                      |   |
|----------------------|---|
| Resolution bandwidth | 200 Hz from 9 – 150 kHz, 9 kHz from 150 kHz – 30 MHz  |
| Video bandwidth      | 600 Hz and 30 kHz respectively  |
| Detector mode        | <ul style="list-style-type: none"><li>– Peak (Preview measurement)</li><li>– Quasi-peak (Final measurement)</li></ul>                 |
| Trace mode           | Max Hold  |
| Measurement time     | <ul style="list-style-type: none"><li>– 100 ms (Peak preview measurement)</li><li>– 15000 ms (Quasi-peak final measurement)</li></ul> |

Spectrum analyzer settings for radiated measurements within restricted bands from 30 – 1000 MHz:

|                      |  |
|----------------------|--|
| Resolution bandwidth | 120 kHz  |
| Video bandwidth      | 300 kHz  |
| Detector mode        | <ul style="list-style-type: none"><li>– Peak (Preview measurement)</li><li>– Quasi-peak (Final measurement)</li></ul>                |
| Trace mode           | Max Hold   |
| Measurement time     | <ul style="list-style-type: none"><li>– 100 ms (Peak preview measurement)</li><li>– 5000 ms (Quasi-peak final measurement)</li></ul> |

7.1.4 Setup details, continued

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**Table 7.1-4:** Radiated disturbance equipment list

| Equipment                       | Manufacturer    | Model no. | Asset no. | Cal cycle | Next cal.   |
|---------------------------------|-----------------|-----------|-----------|-----------|-------------|
| EMI Test Receiver (10m chamber) | Rohde & Schwarz | ESU40     | E1121     | 2 yr      | 25 Nov 2020 |
| EMI Test Receiver (3m chamber)  | Rohde & Schwarz | ESU40     | E1131     | 1 yr      | 19 Nov 2020 |
| System controller (10m chamber) | Sunol Sciences  | SC104V    | E1129     | NCR       | NCR         |
| System controller (3m chamber)  | Sunol Sciences  | SC104V    | E1191     | NCR       | NCR         |
| Active Loop antenna             | Hewlett Packard | 6502      | E1267     | 1 yr      | 12 Nov 2020 |
| Bilog antenna                   | Schaffner       | CBL 6111D | 1480      | 1 yr      | 18 Oct 2020 |

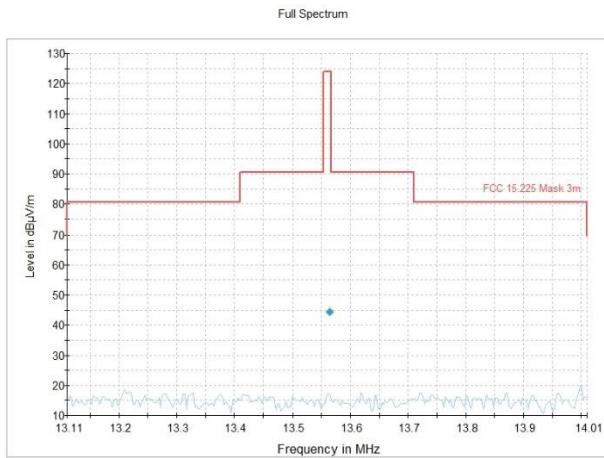
Notes: None

**Table 7.1-5:** Radiated disturbance test software details

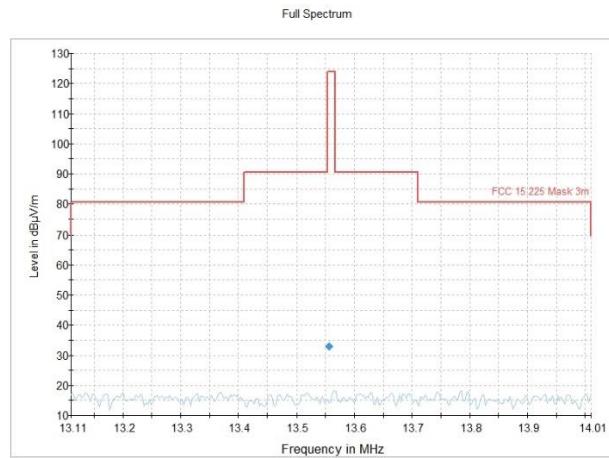
| Manufacturer of Software | Details   |
|--------------------------|---|
| Rohde & Schwarz          | EMC32 V10.00.00 (10m chamber)<br>EMC32 V10.35.10 (3m chamber) |

Notes: None

### 7.1.5 Testing data



**Figure 7.1.1:** Radiated spurious emissions, 13.11-14.01 MHz (3m at 0°)



**Figure 7.1.2:** Radiated spurious emissions, 13.11-14.01 MHz (3m at 90°)

**Table 7.1-6:** Radiated field strength measurement results 13.11-14.01 MHz (Test antenna at 0 Deg)

| Frequency (MHz) | QuasiPeak (dB $\mu$ V/m) | Limit (dB $\mu$ V/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Pol | Azimuth (deg) | Corr. (dB/m) |
|-----------------|--------------------------|----------------------|-------------|-----------------|-----------------|-----|---------------|--------------|
| 13.564605       | 44.51                    | 124.00               | 79.49       | 15000.0         | 9.000           | 0°  | 174.0         | 11.3         |

**Table 7.1-7:** Radiated field strength measurement results 13-14.2 MHz (Test antenna at 90 Deg)

| Frequency (MHz) | QuasiPeak (dB $\mu$ V/m) | Limit (dB $\mu$ V/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Pol | Azimuth (deg) | Corr. (dB/m) |
|-----------------|--------------------------|----------------------|-------------|-----------------|-----------------|-----|---------------|--------------|
| 13.555590       | 32.82                    | 124.00               | 91.18       | 15000.0         | 9.000           | 90° | 215.0         | 11.3         |

7.1.5 Testing data, continued

Full Spectrum

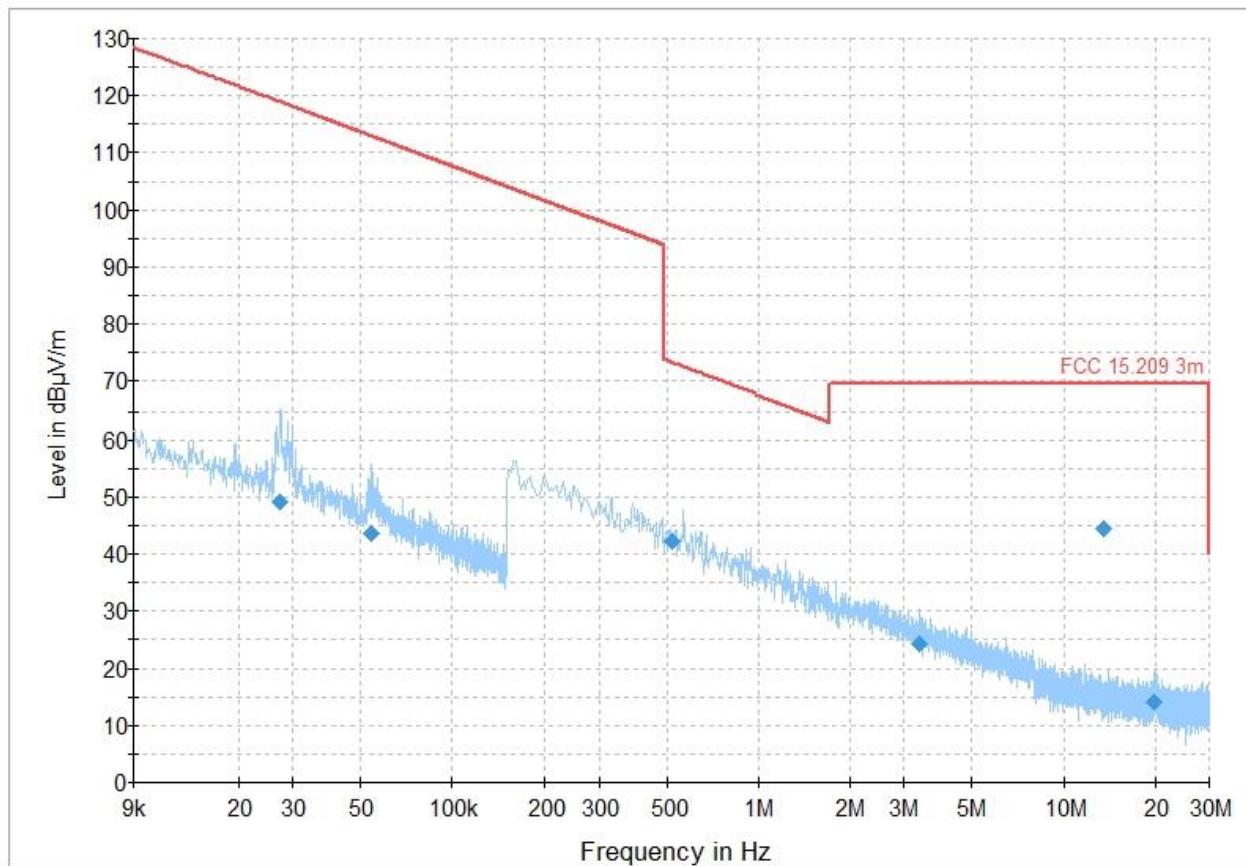


Figure 7.1-3: Radiated spurious emissions, 9 kHz-30 MHz at 0°

Table 7.1-8: Radiated disturbance (Quasi-Peak) results

| Frequency (MHz) | QuasiPeak (dB $\mu$ V/m) | Limit (dB $\mu$ V/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Pol | Azimuth (deg) | Corr. (dB/m) |
|-----------------|--------------------------|----------------------|-------------|-----------------|-----------------|-----|---------------|--------------|
| 0.027210        | 49.06                    | 118.90               | 69.83       | 15000.0         | 0.200           | 0°  | 265.0         | 14.8         |
| 0.053972        | 43.57                    | 112.95               | 69.38       | 15000.0         | 0.200           | 0°  | 267.0         | 12.7         |
| 0.521915        | 42.17                    | 73.25                | 31.08       | 15000.0         | 9.000           | 0°  | 165.0         | 11.0         |
| 3.342800        | 24.22                    | 69.50                | 45.28       | 15000.0         | 9.000           | 0°  | 274.0         | 11.0         |
| 13.564605       | 44.51                    | 69.50                | 24.99       | 15000.0         | 9.000           | 0°  | 174.0         | 11.3         |
| 19.854210       | 14.14                    | 69.50                | 55.36       | 15000.0         | 9.000           | 0°  | 287.0         | 10.9         |

Notes:

<sup>1</sup> Field strength (dB $\mu$ V/m) = receiver/spectrum analyzer value (dB $\mu$ V) + correction factor (dB)

<sup>2</sup> Correction factors = antenna factor ACF (dB) + cable loss (dB) - amplifier gain (dB)

<sup>3</sup> The maximum measured value observed over a period of 15 seconds was recorded.

<sup>4</sup>The spectral plot is a summation of a vertical and horizontal scan.

7.1.5 Testing data, continued

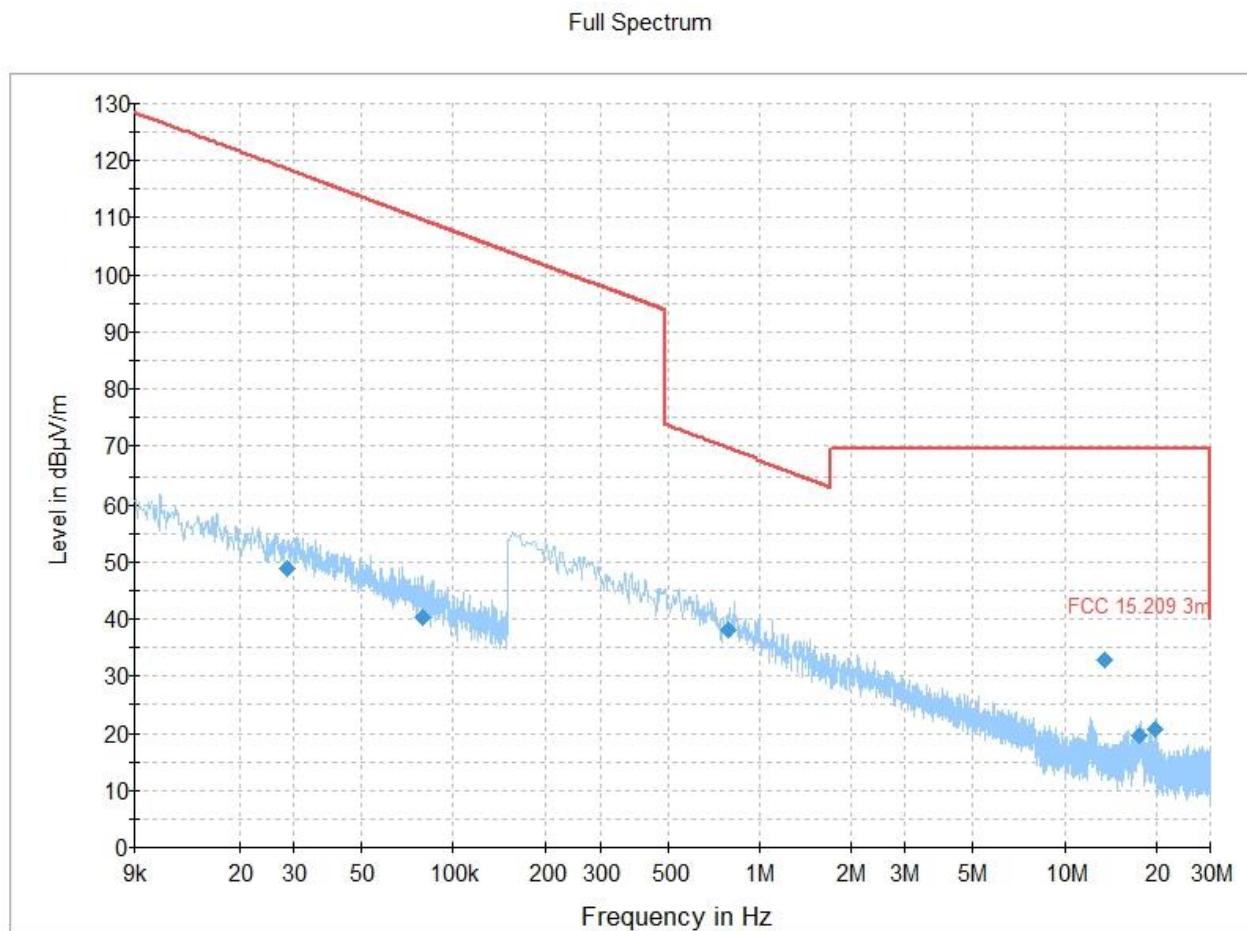


Figure 7.1-4: Radiated spurious emissions, 9 kHz-30 MHz at 90°

Table 7.1-9: Radiated disturbance (Quasi-Peak) results

| Frequency (MHz) | QuasiPeak (dB $\mu$ V/m) | Limit (dB $\mu$ V/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Pol | Azimuth (deg) | Corr. (dB/m) |
|-----------------|--------------------------|----------------------|-------------|-----------------|-----------------|-----|---------------|--------------|
| 0.028470        | 48.81                    | 118.50               | 69.70       | 15000.0         | 0.200           | 90° | 200.0         | 14.7         |
| 0.079648        | 40.22                    | 109.57               | 69.35       | 15000.0         | 0.200           | 90° | 327.0         | 12.2         |
| 0.785610        | 38.17                    | 69.71                | 31.54       | 15000.0         | 9.000           | 90° | 162.0         | 10.8         |
| 13.555590       | 32.82                    | 69.50                | 36.68       | 15000.0         | 9.000           | 90° | 215.0         | 11.3         |
| 17.658175       | 19.65                    | 69.50                | 49.85       | 15000.0         | 9.000           | 90° | 174.0         | 11.1         |
| 19.694780       | 20.57                    | 69.50                | 48.93       | 15000.0         | 9.000           | 90° | 0.0           | 11.0         |

Notes:

<sup>1</sup> Field strength (dB $\mu$ V/m) = receiver/spectrum analyzer value (dB $\mu$ V) + correction factor (dB)

<sup>2</sup> Correction factors = antenna factor ACF (dB) + cable loss (dB) - amplifier gain (dB)

<sup>3</sup> The maximum measured value observed over a period of 15 seconds was recorded.

<sup>4</sup>The spectral plot is a summation of a vertical and horizontal scan.

7.1.5 Testing data, continued

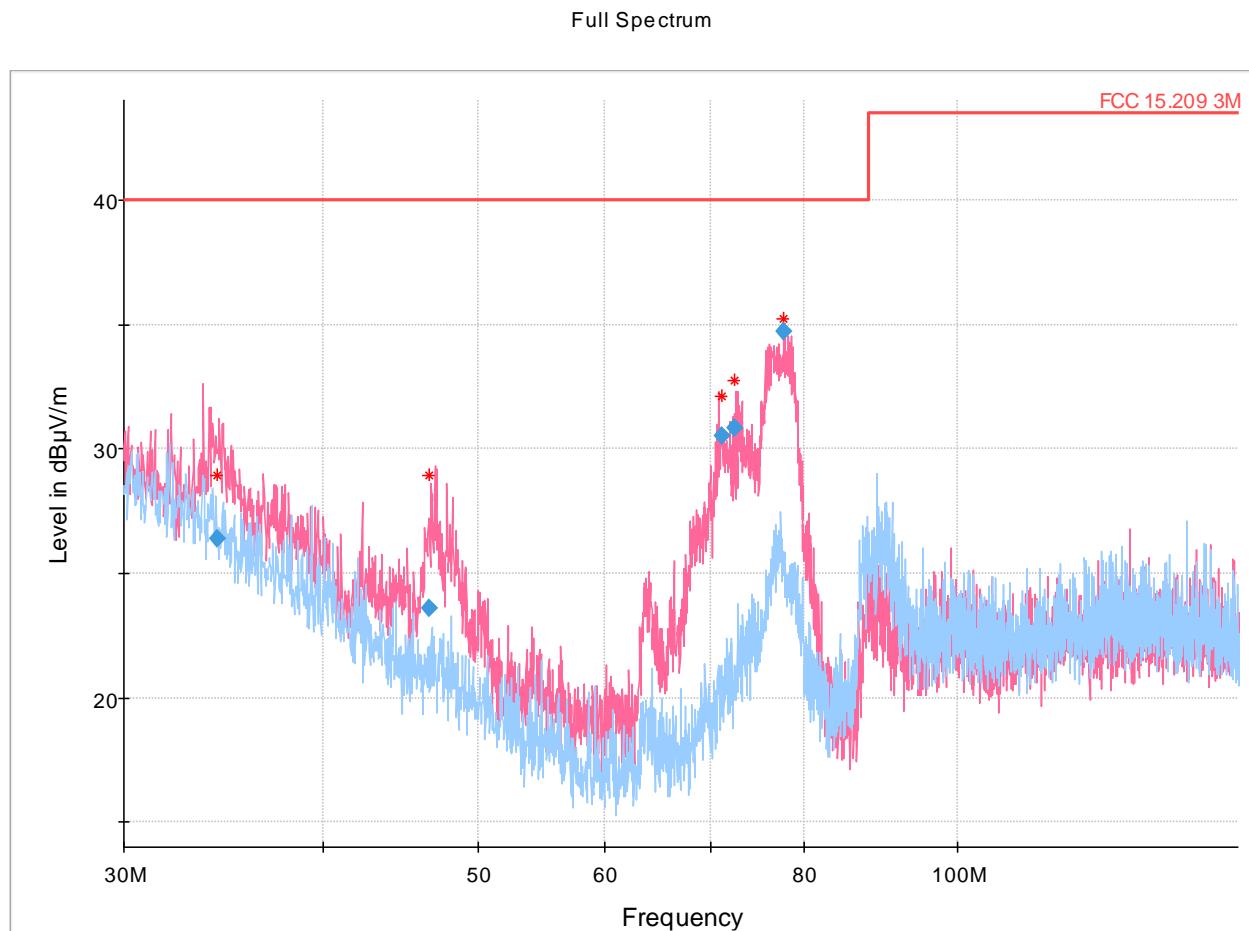


Figure 7.1-5: Radiated spurious emissions, 30 MHz – 150 MHz

Table 7.1-10: Radiated disturbance (Quasi-Peak) results

| Frequency (MHz) | QuasiPeak (dB $\mu$ V/m) | Limit (dB $\mu$ V/m) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Height (cm) | Pol | Azimuth (deg) | Corr. (dB) |
|-----------------|--------------------------|----------------------|-------------|-----------------|-----------------|-------------|-----|---------------|------------|
| 34.313667       | 26.37                    | 40.00                | 13.63       | 5000.0          | 120.000         | 124.6       | V   | 190.0         | 23.3       |
| 46.627333       | 23.58                    | 40.00                | 16.42       | 5000.0          | 120.000         | 116.1       | V   | 32.0          | 16.6       |
| 71.092333       | 30.53                    | 40.00                | 9.47        | 5000.0          | 120.000         | 110.7       | V   | 269.0         | 13.4       |
| 72.470667       | 30.82                    | 40.00                | 9.18        | 5000.0          | 120.000         | 98.0        | V   | 16.0          | 13.6       |
| 77.698000       | 34.75                    | 40.00                | 5.25        | 5000.0          | 120.000         | 118.5       | V   | 216.0         | 14.2       |

Notes:

<sup>1</sup> Field strength (dB $\mu$ V/m) = receiver/spectrum analyzer value (dB $\mu$ V) + correction factor (dB)

<sup>2</sup> Correction factors = antenna factor ACF (dB) + cable loss (dB)

<sup>3</sup> The maximum measured value observed over a period of 5 seconds was recorded.

<sup>4</sup> The spectral plot is a summation of a vertical and horizontal scan.

<sup>5</sup> The spectrum was investigated from the lowest radio frequency signal generated in the device to the tenth harmonic of the highest fundamental frequency.

## 7.2 Conducted emissions

### 7.2.1 References

Title 47 → Chapter I → Subchapter A → Part 15 → Subpart C → §15.207 / ANSI C63.4: 2014

(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 of emission (MHz) | Conducted limit (dB $\mu$ V) |           |
|-----------------------------|------------------------------|-----------|
|                             | 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

(b) The limit shown in paragraph (a) of this section shall not apply to carrier current systems operating as intentional radiators on frequencies below 30 MHz. In lieu thereof, these carrier current systems shall be subject to the following standards:

- For carrier current system containing their fundamental emission within the frequency band 535-1705 kHz and intended to be received using a standard AM broadcast receiver: no limit on conducted emissions.
- For all other carrier current systems: 1000  $\mu$ V within the frequency band 535-1705 kHz, as measured using a 50  $\mu$ H/50 ohms LISN.
- Carrier current systems operating below 30 MHz are also subject to the radiated emission limits in §15.205, §15.209, §15.221, §15.223, or §15.227, as appropriate.

(c) Measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

## 7.2.2 Conducted Emissions Test summary

|               |                              |                   |           |
|---------------|------------------------------|-------------------|-----------|
| Verdict       | Pass                         |                   |           |
| Test date     | July 24, 2020                | Temperature       | 23 °C     |
| Test engineer | David Hewitt, EMC Specialist | Air pressure      | 1006 mbar |
| Test location | Ground Plane                 | Relative humidity | 54 %      |

## 7.2.3 Notes

None

## 7.2.4 Setup details

|                         |  |
|-------------------------|--|
| Port under test         | AC Mains   |
| EUT setup configuration | Table top  |
| Measurement details     | A preview measurement was generated with the receiver in continuous scan mode. Emissions detected within 6 dB or above limit were re-measured with the appropriate detector against the correlating limit and recorded as the final measurement. |

Receiver settings:

|                      |   |
|----------------------|---|
| Resolution bandwidth | 9 kHz   |
| Video bandwidth      | 30 kHz  |
| Detector mode        | <ul style="list-style-type: none"> <li>– Peak and Average (Preview measurement)</li> <li>– Quasi-peak and CAverage (Final measurement)</li> </ul>   |
| Trace mode           | Max Hold  |
| Measurement time     | <ul style="list-style-type: none"> <li>– 100 ms (Peak and Average preview measurement)</li> <li>– 5000 ms (Quasi-peak final measurement)</li> <li>– 5000 ms (CAverage final measurement)</li> </ul> |

**Table 7.2-1:** Conducted disturbance at mains port equipment list

| Equipment          | Manufacturer    | Model no.        | Asset no. | Cal cycle | Next cal.   |
|--------------------|-----------------|------------------|-----------|-----------|-------------|
| EMI Test Receiver  | Rohde & Schwarz | ESCI 7           | E1026     | 2 yr      | 29 May 2021 |
| Transient Limiter  | Hewlett-Packard | 11947A           | 681       | 1 yr      | 20 Jan 2021 |
| Two Line V-Network | Rohde & Schwarz | ENV216           | E1020     | 1 yr      | 29 Aug 2020 |
| LISN               | Solar           | 9348-50-R-24-BNC | 384       | 1 yr      | 8 Aug 2020  |

Notes: None

**Table 7.2-2:** Conducted disturbance at mains port test software details

| Manufacturer of Software | Details          |
|--------------------------|------------------|
| Rohde & Schwarz          | EMC 32 V10.20.01 |

Notes: None

7.2.5 Conducted Emissions Test data

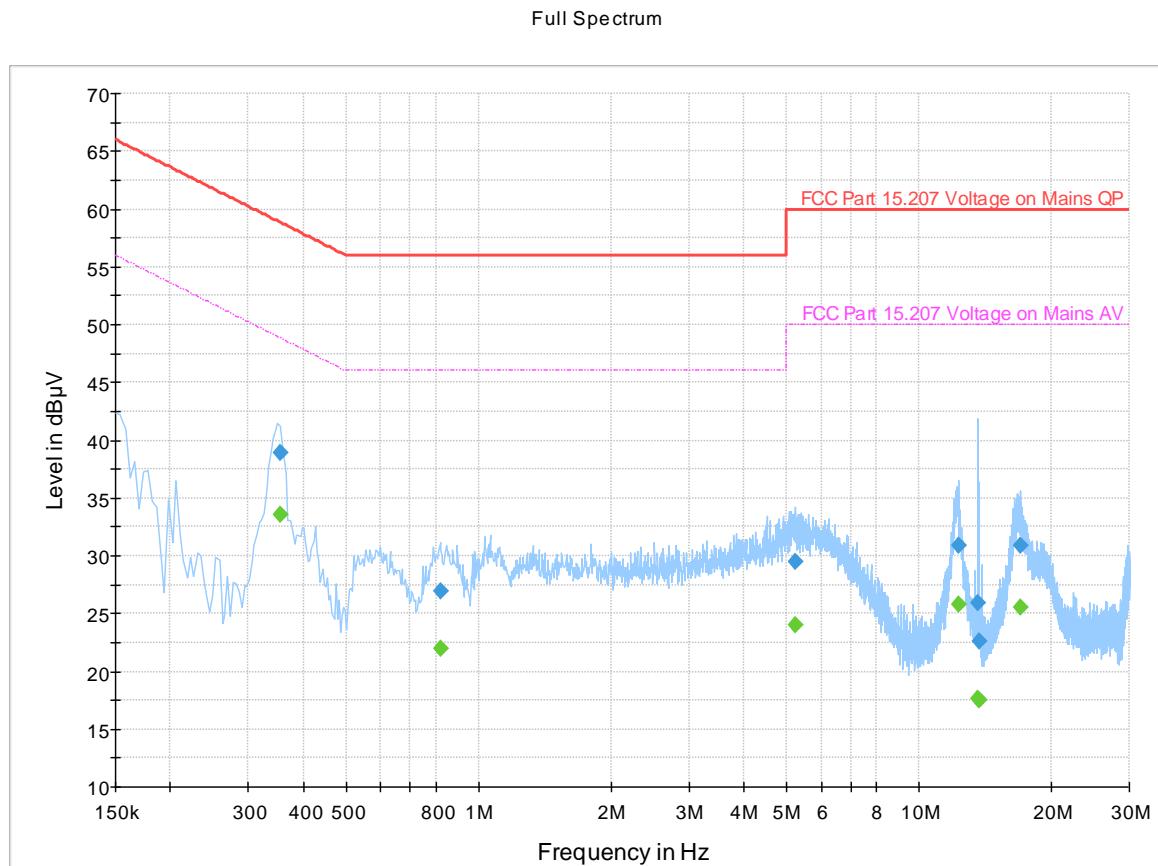


Figure 7.2.1: Conducted spurious emissions, 150 kHz-30 MHz

Table 7.2-3 Conducted disturbance at AC mains results (Quasi-Peak and Average)

| Frequency (MHz) | QuasiPeak (dBµV) | CAverage (dBµV) | Limit (dBµV) | Margin (dB) | Meas. Time (ms) | Bandwidth (kHz) | Line | Filter | Corr. (dB) |
|-----------------|------------------|-----------------|--------------|-------------|-----------------|-----------------|------|--------|------------|
| 0.354000        | ---              | 33.57           | 48.87        | 15.29       | 5000.0          | 9.000           | N    | ON     | 19.5       |
| 0.354000        | 38.96            | ---             | 58.87        | 19.91       | 5000.0          | 9.000           | N    | ON     | 19.5       |
| 0.818000        | 26.89            | ---             | 56.00        | 29.11       | 5000.0          | 9.000           | L1   | ON     | 19.4       |
| 0.818000        | ---              | 21.96           | 46.00        | 24.04       | 5000.0          | 9.000           | L1   | ON     | 19.4       |
| 5.234000        | ---              | 24.07           | 50.00        | 25.93       | 5000.0          | 9.000           | N    | ON     | 19.3       |
| 5.234000        | 29.45            | ---             | 60.00        | 30.55       | 5000.0          | 9.000           | N    | ON     | 19.3       |
| 12.258000       | 30.83            | ---             | 60.00        | 29.17       | 5000.0          | 9.000           | L1   | ON     | 19.9       |
| 12.258000       | ---              | 25.78           | 50.00        | 24.22       | 5000.0          | 9.000           | L1   | ON     | 19.9       |
| 13.582000       | ---              | 17.70           | 50.00        | 32.30       | 5000.0          | 9.000           | N    | ON     | 20.1       |
| 13.582000       | 25.88            | ---             | 60.00        | 34.12       | 5000.0          | 9.000           | N    | ON     | 20.1       |
| 13.642000       | ---              | 17.52           | 50.00        | 32.48       | 5000.0          | 9.000           | N    | ON     | 20.1       |
| 13.642000       | 22.60            | ---             | 60.00        | 37.40       | 5000.0          | 9.000           | N    | ON     | 20.1       |
| 16.938000       | ---              | 25.59           | 50.00        | 24.41       | 5000.0          | 9.000           | N    | ON     | 20.3       |
| 16.938000       | 30.95            | ---             | 60.00        | 29.05       | 5000.0          | 9.000           | N    | ON     | 20.3       |

Notes: <sup>1</sup> Result (dBµV) = receiver/spectrum analyzer value (dBµV) + correction factor (dB)

<sup>2</sup> Correction factor (dB) = LISN factor IL (dB) + cable loss (dB) + transient limiter (dB)

<sup>3</sup> The maximum measured value observed over a period of 5 seconds was recorded.

## 7.3 Carrier frequency stability

### 7.3.1 Definition and limits

47 CFR § 15.225 - Operation within the band 13.110-14.010 MHz

- e) The frequency tolerance of the carrier signal shall be maintained within  $\pm 0.01\%$  of the operating frequency over a temperature variation of -20 degrees to + 50 degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery.

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- b) The carrier frequency stability shall not exceed  $\pm 100$  ppm

### 7.3.2 Test Summary

|               |                              |                   |           |
|---------------|------------------------------|-------------------|-----------|
| Verdict       | Pass                         |                   |           |
| Test date     | July 27, 2020                | Temperature       | 22 °C     |
| Test engineer | David Hewitt, EMC Specialist | Air pressure      | 1004 mbar |
| Test location | Wireless Bench               | Relative humidity | 60 %      |

### 7.3.3 Observations, settings and special notes

Frequency stability results were compared to calculated OBW Center Freq @ 20°C and 120 V<sub>AC</sub> per RSS-Gen 6.7: 13.5612908 MHz

### 7.3.4 Setup details

ANSI C63.10-2013: §6.8.1 Frequency stability with respect to ambient temperature  
 §6.8.2 Frequency stability when varying supply voltage

**Table 7.3-1: Carrier frequency stability equipment list**

| Equipment                    | Manufacturer    | Model no. | Asset no. | Cal cycle | Next cal.   |
|------------------------------|-----------------|-----------|-----------|-----------|-------------|
| Signal and Spectrum Analyzer | Rohde & Schwarz | FSW 43    | E1302     | 1 yr      | 10 Jan 2021 |
| Environmental chamber        | Test Equity     | 115A      | E1162     | 1 yr      | 3 Aug 2020  |

### 7.3.5 Test results

| Temp (C°) | Voltage                | F <sub>c</sub> (MHz) | Frequency drift, $\pm$ ppm | Limit, $\pm$ ppm | Margin, ppm |
|-----------|------------------------|----------------------|----------------------------|------------------|-------------|
| +50       | Nominal (120 Vac)      | 13.56055441          | -20.41135945               | 100              | 79.58864055 |
| +40       | Nominal (120 Vac)      | 13.56106638          | 17.34222604                | 100              | 82.65777396 |
| +30       | Nominal (120 Vac)      | 13.56053877          | -21.56468108               | 100              | 78.43531892 |
| +20       | 115% Nominal (138 Vac) | 13.56107031          | 17.6324                    | 100              | 82.3676     |
| +20       | Nominal (120 Vac)      | 13.5612908           | Reference                  | Reference        | Reference   |
| +20       | 85% Nominal (102 Vac)  | 13.56024871          | -42.95385669               | 100              | 57.04614331 |
| +10       | Nominal (120 Vac)      | 13.56102503          | 14.29337163                | 100              | 85.70662837 |
| +0        | Nominal (120 Vac)      | 13.56111297          | 20.77785615                | 100              | 79.22214385 |
| -10       | Nominal (120 Vac)      | 13.55992388          | -66.90777185               | 100              | 33.09222815 |
| -20       | Nominal (120 Vac)      | 13.56111297          | 20.77785615                | 100              | 79.22214385 |

Notes: The carrier frequency (F<sub>c</sub>) was calculated at each temperature and supply voltage as follows using (F<sub>l</sub>) as the low boundary and (F<sub>h</sub>) as the high boundary measured during 99% OBW calculations.

$$F_c = \frac{F_l + F_h}{2}$$

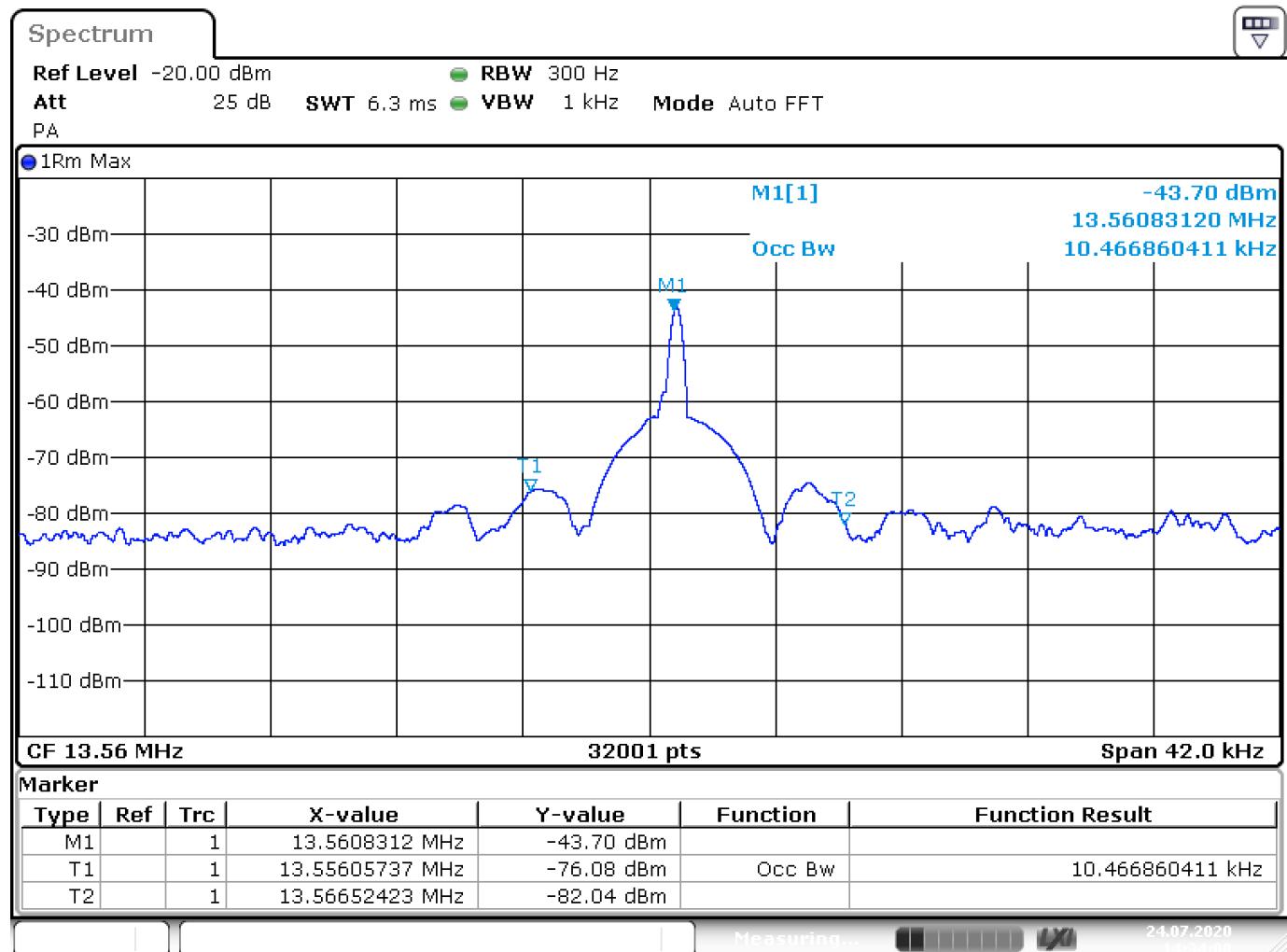
Frequency drift was calculated as follows:

$$F_{\text{measured}} = F_c = (F_l + F_h)/2$$

$$\text{Frequency drift (ppm)} = ((F_{\text{measured}} - F_{\text{reference}}) \div F_{\text{reference}}) \times 1 \times 10^6$$

### 7.3.5 Test results, continued

OBW Reference Freq @ 20°C and 120 V<sub>AC</sub>



Date: 24.JUL.2020 14:34:08

## 7.4 Occupied Bandwidth: 99% OBW and 20 dB Bandwidth

### 7.4.1 References

RSS-Gen — 6.7 Occupied bandwidth (or 99% emission bandwidth) and x dB bandwidth

The occupied bandwidth or the “99% emission bandwidth” is defined as the frequency range between two points, one above and the other below the carrier frequency, within which 99% of the total transmitted power of the fundamental transmitted emission is contained. The occupied bandwidth shall be reported for all equipment in addition to the specified bandwidth required in the applicable RSSs.

In some cases, the “x dB bandwidth” is required, which is defined as the frequency range between two points, one at the lowest frequency below and one at the highest frequency above the carrier frequency, at which the maximum power level of the transmitted emission is attenuated x dB below the maximum in-band power level of the modulated signal, where the two points are on the outskirts of the in-band emission.

The following conditions shall be observed for measuring the occupied bandwidth and x dB bandwidth:

The transmitter shall be operated at its maximum carrier power measured under normal test conditions.

The span of the spectrum analyzer shall be set large enough to capture all products of the modulation process, including the emission skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.

The detector of the spectrum analyzer shall be set to “Sample”. However, a peak, or peak hold, may be used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement). Use of a peak hold (or “Max Hold”) may be necessary to determine the occupied / x dB bandwidth if the device is not transmitting continuously.

The resolution bandwidth (RBW) shall be in the range of 1% to 5% of the actual occupied / x dB bandwidth and the video bandwidth (VBW) shall not be smaller than three times the RBW value. Video averaging is not permitted.

Note: It may be necessary to repeat the measurement a few times until the RBW and VBW are in compliance with the above requirement.

For the 99% emission bandwidth, the trace data points are recovered and directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached, and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded. The difference between the two recorded frequencies is the occupied bandwidth (or the 99% emission bandwidth).

47 CFR § 15.215 - Additional provisions to the general radiated emission limitations.

c) Intentional radiators operating under the alternative provisions to the general emission limits, as contained in §§ 15.217 through 15.257 and in subpart E of this part, must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. In the case of intentional radiators operating under the provisions of subpart E, the emission bandwidth may span across multiple contiguous frequency bands identified in that subpart. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

### 7.4.2 Notes

None

### 7.4.3 Test Summary

|               |                              |                   |           |
|---------------|------------------------------|-------------------|-----------|
| Test date     | July 27, 2020                | Temperature       | 22 °C     |
| Test engineer | David Hewitt, EMC Specialist | Air pressure      | 1004 mbar |
| Test location | Wireless workbench           | Relative humidity | 60 %      |

#### 7.4.4 Setup Details

Spectrum analyzer settings:

|                      |  |
|----------------------|--|
| Resolution bandwidth | 100 kHz  |
| Video bandwidth      | 300 kHz ( $\geq 3 \times$ RBW)                             |
| Frequency span       | 18 kHz ( $1.5 \times$ OBW $\leq$ Span $\leq 5 \times$ OBW) |
| Detector mode        | Peak   |
| Trace mode           | Max Hold   |

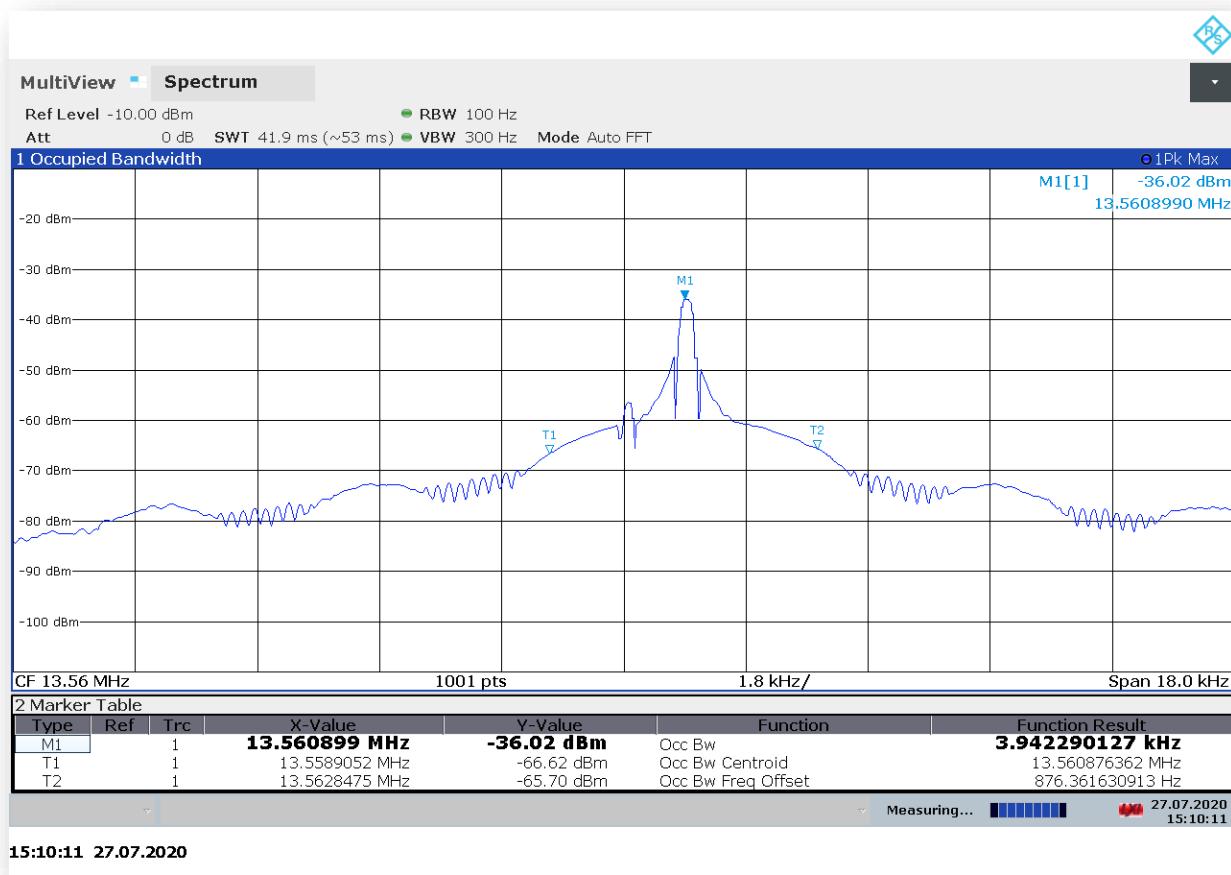
Table 7.4-1: Occupied bandwidth equipment list

| Equipment                    | Manufacturer    | Model no. | Asset no. | Cal cycle | Next cal.   |
|------------------------------|-----------------|-----------|-----------|-----------|-------------|
| Signal and Spectrum Analyzer | Rohde & Schwarz | FSW 43    | E1302     | 1 yr      | 10 Jan 2021 |
| Active Loop H Field Antenna  | Hewlett-Packard | 6502      | E1267     | 1 yr      | 12 Nov 2020 |

Notes: None

#### 7.4.5 Test Data

99% Occupied Bandwidth

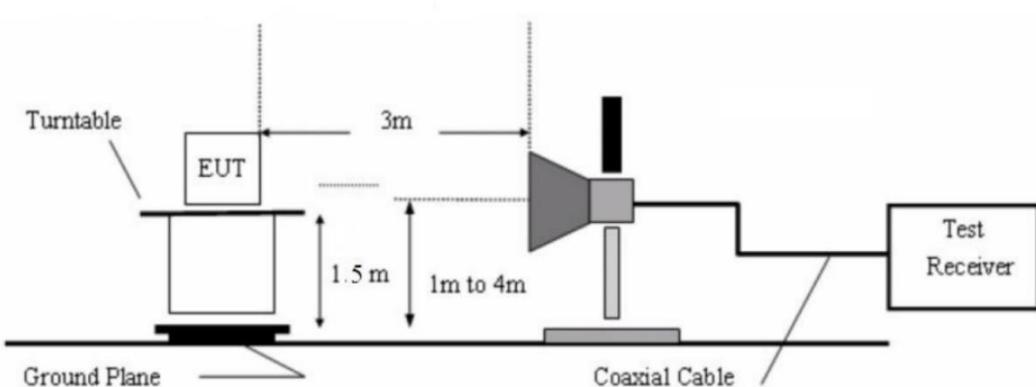
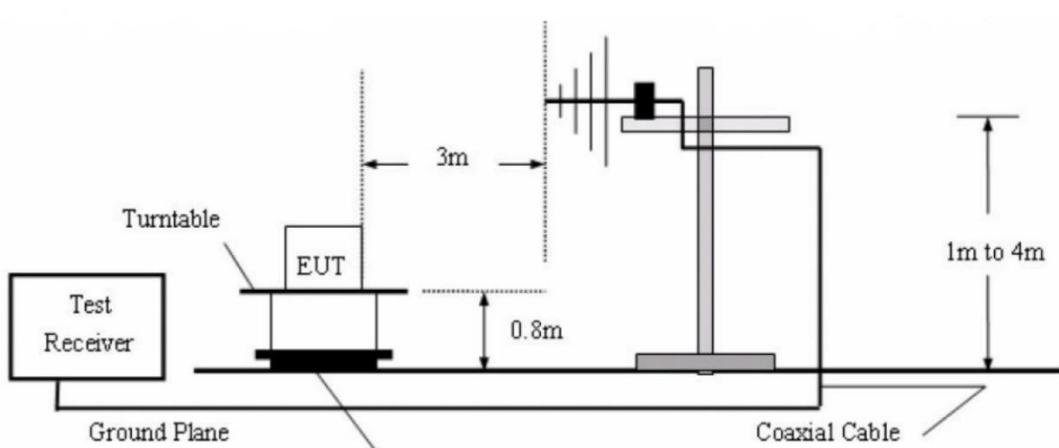
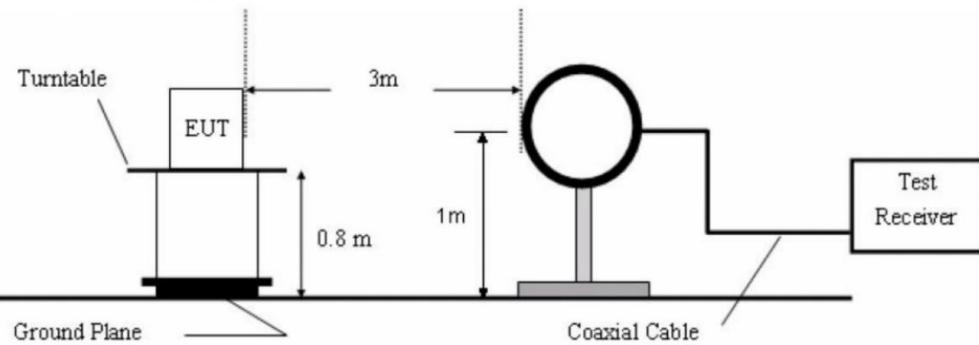


20 dB Bandwidth



## Section 8. Block diagrams of test setups

### 8.1 Radiated emissions set-up



## 8.2 Conducted emissions set-up

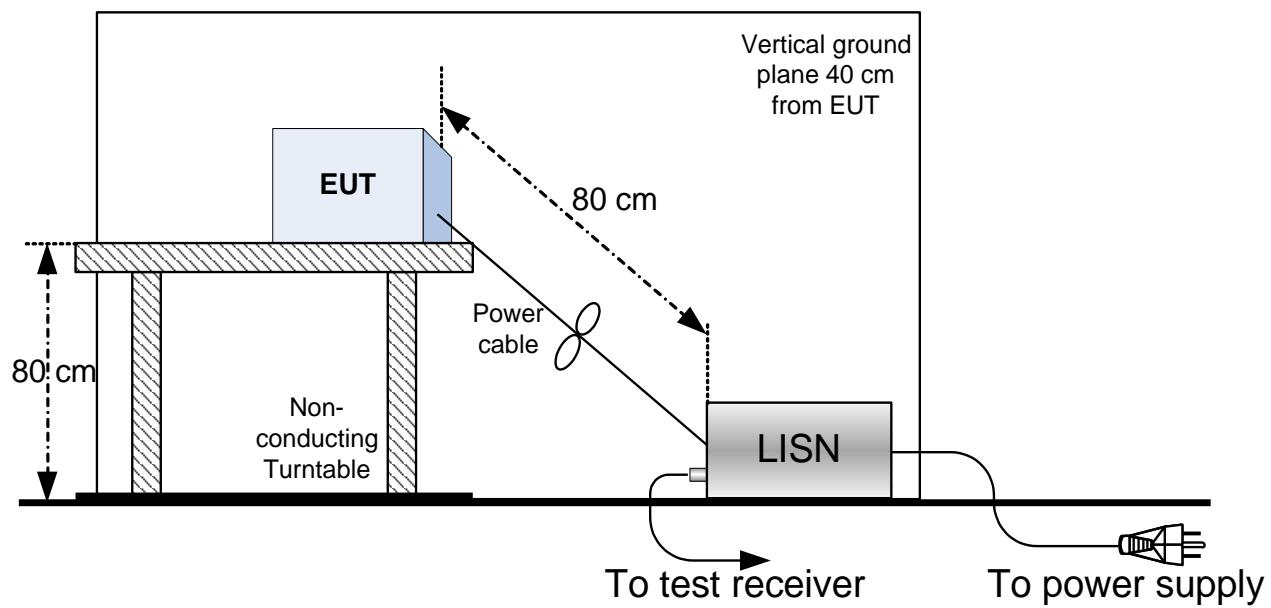


Figure 8.2-2: Conducted Emissions Test Setup – 150 kHz to 30 MHz