



FCC PART 15, SUBPART C ISED RSS-247, ISSUE 2, FEBRUARY 2017

TEST AND MEASUREMENT REPORT

For

KHN Solutions Inc.

300 Broadway #26,
San Francisco, CA 94133

**FCC ID: S8B-C6
IC: 10935A-C6**

Report Type: Original Report	Product Type: Breathalyzer
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Report Number: <u>R1707144-247 (BLE)</u>	
Report Date: <u>2017-09-07</u>	
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Note: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA*, NIST, or any agency of the Federal Government.

* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk “*” (Rev.2)

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1707144-247 (BLE)	Original Report	-
1	R1707144-247 (BLE) Rev.A	Final Report revision	2017-08-31
2	R1707144-247 (BLE) Rev.B	Final Report revision	2017-09-07

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *KHN Solutions Inc.* and their product model: *BT-C6*, FCC ID: S8B-C6, IC: 10935A-C6 or the “EUT” as referred to in this report. It is a Breathalyzer that contains a Bluetooth Low Energy module inside. And this product is powered by a non-rechargeable AAA battery.

1.2 Mechanical Description of EUT

The EUT measures approximately 5.6 cm (L) x 3.5 cm (W) x 1.8 cm (H) and weighs less than 38g.

The test data gathered are from typical production sample, serial number: R1707144-1 assigned by BACL.

1.3 Objective

This report is prepared on behalf of *KHN Solutions Inc.* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISED RSS-247 Issue 2, FEBRUARY 2017.

The objective is to determine compliance with FCC Part 15.247 and ISED RSS-247 rules for Output Power, Antenna Requirements, 6 dB and 99% Emission Bandwidth, Power Spectral Density, 100 kHz Bandwidth of Band Edges Measurement, Conducted and Radiated Spurious Emissions.

1.4 Related Submittal(s)/Grant(s)

N/A

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.6 Measurement Uncertainty

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

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

1.7 Test Facility Registrations

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

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

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

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

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

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

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

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

- For the USA (Federal Communications Commission):

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

- For the Canada (Industry Canada):

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

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

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

- For the Hong Kong Special Administrative Region:

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

- For Japan:

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

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

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

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

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Industry Canada - IC) Foreign Certification Body – FCB – APEC Tel MRA -Phase I and Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o Radio and Teleterminal Equipment (RandTTE) Directive 1995/5/EC
US -EU EMC and Telecom MRA CAB
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA)
APEC Tel MRA -Phase I and Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Development Authority - IDA) APEC Tel MRA -Phase I and Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v04.

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

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

2.2 EUT Exercise Software

N/A

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v04 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

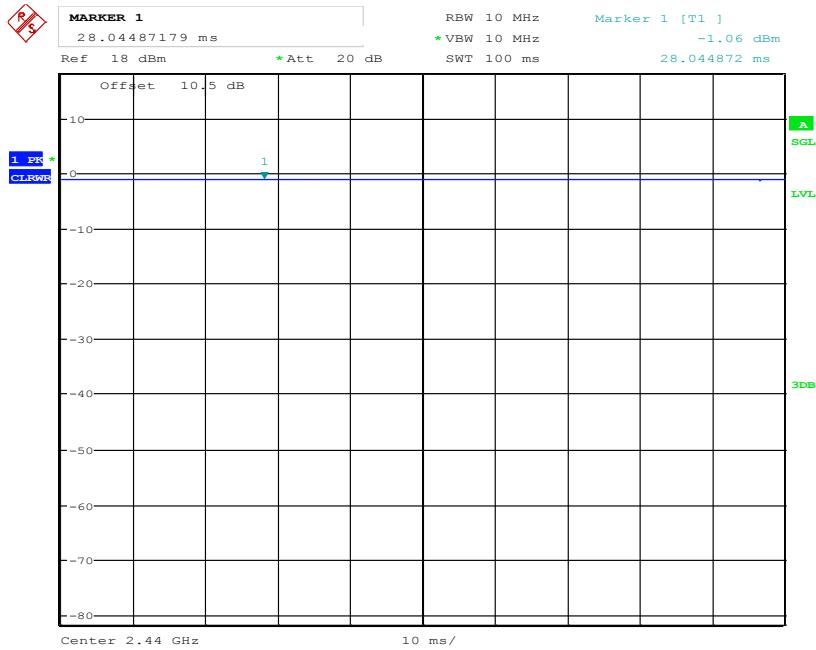
Radio Mode	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
BLE	100	100	100	0

Duty Cycle = On Time (ms) / Period (ms)

Duty Cycle Correction Factor (dB) = $10 \log(1/\text{Duty Cycle})$

Please refer to the following plot.

BLE



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2.4 Equipment Modifications

N/A

2.5 Local Support Equipment

Manufacturer	Description	Model
/	/	/

2.6 Support Equipment

There was no support equipment included, or intended for use with EUT during these tests.

2.7 Interface Ports and Cabling

Cable Description	Length (m)	To	From
RF Cable	< 0.2 m	EUT	Signal Analyzer

3 Summary of Test Results

Results reported relate only to the product tested.

FCC and ISED Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §8.3	Antenna Requirement	Compliant
FCC §15.207 ISED RSS-Gen §8.8	AC Line Conducted Emissions	N/A ¹
FCC §2.1093, §15.247(i) ISED RSS-102	RF Exposure	Compliant
FCC §2.1051, §15.247 (d) ISED RSS-247 §5.5	Spurious Emissions at Antenna Port	Compliant
FCC §2.1053, §15.205, §15.209, §15.247 (d) ISED RSS-247 §5.5 RSS-Gen §8.9 and §8.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISED RSS-247 §5.2 (1)	6 dB and 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISED RSS-247 §5.4 (4)	RF Output Power	Compliant
FCC §15.247(d) ISED RSS-247 §5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §15.247(e) ISED RSS-247 §5.2 (2)	Power Spectral Density	Compliant

Note¹: The EUT is powered by battery only.

4 FCC §15.203 and ISED RSS-Gen §8.3 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISED RSS-Gen §8.3: Transmitter Antenna

The applicant for equipment certification, as per RSP-100, must provide a list of all antenna types that may be used with the license-exempt transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna.

License-exempt transmitters that have received equipment certification may operate with different types of antennas. However, it is not permissible to exceed the maximum equivalent isotropically radiated power (e.i.r.p.) limits specified in the applicable standard (RSS) for the license-exempt apparatus.

Testing shall be performed using the highest gain antenna of each combination of license-exempt transmitter and antenna type, with the transmitter output power set at the maximum level.⁹ When a measurement at the antenna connector is used to determine RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna manufacturer.

User manuals for transmitters equipped with detachable antennas shall also contain the following notice in a conspicuous location:

This radio transmitter (identify the device by certification number) has been approved by Industry Canada to operate with the antenna types listed below with the maximum permissible gain indicated. Antenna types not included in this list, having a gain greater than the maximum gain indicated for that type, are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types approved for use with the transmitter, indicating the maximum permissible antenna gain (in dBi).

4.2 Antenna Description

The antenna used by the EUT is permanent attached antenna.

Radio Antenna	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
BLE	2400-2483.5	5.3

5 FCC §2.1093, §15.247(i) and ISED RSS-102 - RF Exposure

5.1 Applicable Standard

According to FCC §2.1093 and §1.1307(b) (1), systems operating under the provisions of this section shall be operated in a manner that ensure that the public is not exposed to radio frequency energy level in excess of the Commission's guideline.

According to KDB 447498 D01 General RF Exposure Guidance

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

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot$$

$[\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

1. $f(\text{GHz})$ is the RF channel transmit frequency in GHz.
2. Power and distance are rounded to the nearest mW and mm before calculation.
3. The result is rounded to one decimal place for comparison.
4. When the minimum test separation distance is < 5 mm, a distance of 5 mm is applied to determine SAR test Exclusion.

For worst case:

Frequency (MHz)	Maximum Conducted Tune-up power		Calculated Distance (mm)	Calculated Value	Threshold (1-g SAR)	SAR Test Exclusion
	Power (dBm)	Power (mW)				
2480	0	1	5.0	0.3	3.0	Yes

Result: No SAR test is required

According to RSS-102 Issue 5 § (2.5.1), SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in Table 1.

Table 1: SAR evaluation – Exemption limits for routine evaluation based on frequency and separation distance^{4,5}

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

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

Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in Table 1 are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in Table 1, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required.

For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.

Test Result:

The higher of the conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power:

$$(2480-2450)/(3500-2450) = (4-P)/(4-2)$$

The exemption limit of 2480MHz is $P = 3.94$ mW

Ant gain: 5.3 dBi

Tune up conducted power=0dBm

2480 MHz e.i.r.p.: $(0+5.3)\text{dBm} = 5.3\text{dBm} = 3.39\text{mW} < 3.94\text{mW}$

So the stand-alone SAR evaluation can be exempted.

6 FCC §15.209, §15.247(d) and ISED RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

6.1 Applicable Standards

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

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

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423		4. 5 – 5. 15
0.495 – 0.505	16.69475 – 16.69525	960 – 1240	5. 35 – 5. 46
2.1735 – 2.1905	25.5 – 25.67	1300 – 1427	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1435 – 1626.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1645.5 – 1646.5	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1660 – 1710	9.3 – 9.5
6.215 – 6.218	108 – 121.94	1718.8 – 1722.2	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2200 – 2300	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2310 – 2390	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2483.5 – 2500	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	2690 – 2900	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3260 – 3267	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.332 – 3.339	23.6 – 24.0
12.29 – 12.293	240 – 285	3.3458 – 3.358	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4	3.600 – 4.400	36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

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

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

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz.

However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d), 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)).

As per ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength (μV/m at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISED RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

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

6.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

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

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

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak: $\text{RBW} = 1\text{MHz} / \text{VBW} = 1\text{MHz} / \text{Sweep} = \text{Auto}$
- (2) Average: $\text{RBW} = 1\text{MHz} / \text{VBW} > 1/T \text{ Hz} / \text{Sweep} = \text{Auto}$

Where T is the period of the transmitting signal

6.4 Corrected Amplitude and Margin Calculation

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

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

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

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

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

6.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950K03	100338	2016-02-04	2 year
Agilent	Analyzer, Spectrum	E4440A	US45303156	2017-02-04	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Sciences	Antenna, Biconi-Log	JB3	A020106-2	2015-07-11	26 Months
EMCO	Antenna, Horn	3115	9511-4627	2016-01-28	2 years
Agilent	Amplifier, Pre	8447D	2944A10187	2017-03-13	1 year
IW	Armored High Frequency Cable	DC 1531	KPS-1501A3960KPS	2016-08-05	1 year
-	SMA cable	-	C0002	Each time ¹	Each time ¹
-	N-Type Cable	-	C00014	2017-05-28	1 year
Agilent	Pre-Amplifier	8449B	3008A01978	2016-10-06	1 year
Wisewave	Antenna, Horn	ARH-4223-02	10555-01	2015-10-22	2 years
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: **BACL** attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.

6.6 Test Environmental Conditions

Temperature:	24 °C
Relative Humidity:	46 %
ATM Pressure:	101.2 kPa

The testing was performed by Candy Li on 2017-08-04 in 5m chamber 3.

6.7 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISED RSS-247 standard's radiated emissions limits, and had the worst margin of:

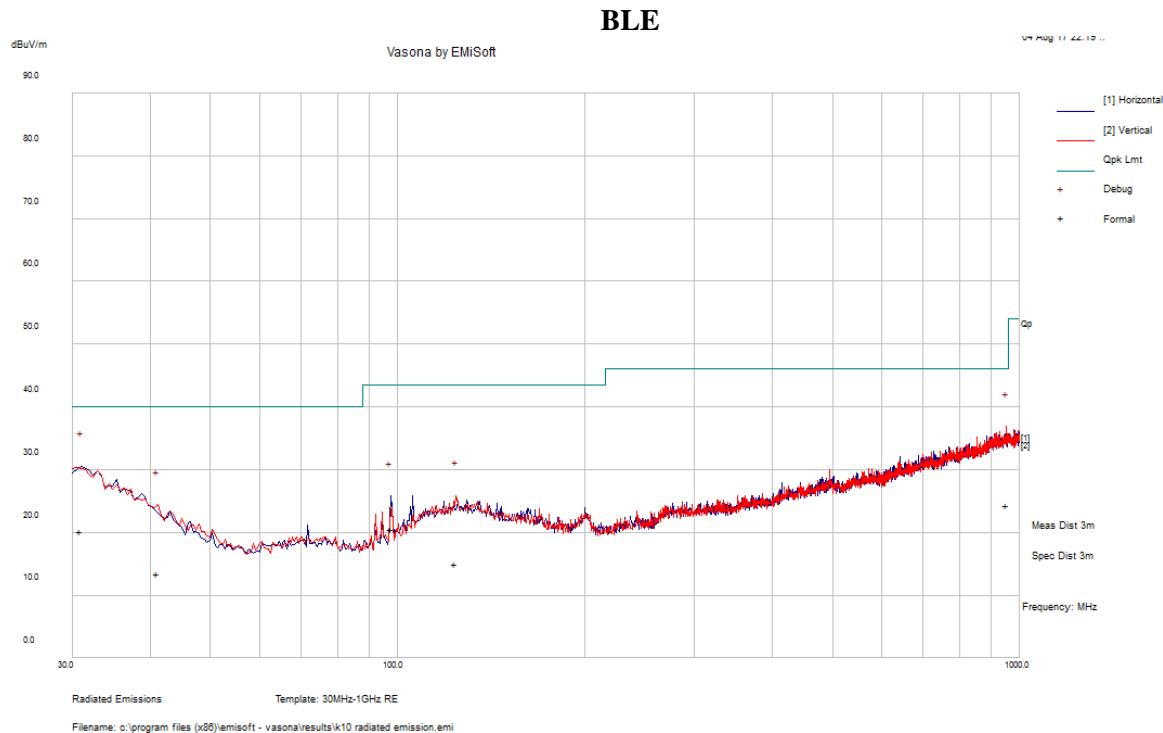
BLE

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Scan range
-2.93	2483.5	Horizontal	30 MHz – 25 GHz

Please refer to the following table and plot for specific test result details

6.8 Radiated Emissions Test Results

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



Frequency (MHz)	Corrected Amplitude (dB μ V/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dB μ V/m)	Margin (dB)	Comment
30.93025	20.13	130	H	64	40	-19.87	QP
953.0043	24.42	221	V	139	46	-21.58	QP
97.6505	20.48	184	H	134	43.5	-23.02	QP
41.0515	13.46	213	V	63	40	-26.54	QP
123.8535	14.97	285	V	316	43.5	-28.53	QP

2) 1-25 GHz Measured at 3 meters

BLE

Frequency (MHz)	S.A. Reading (dB μ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB μ V/m)	FCC/ISED		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB μ V/m)	Margin (dB)	
Low Channel 2402 MHz											
2402	59.41	13	260	H	29.04	6.25	0	94.70	-	-	PK
2402	58.80	13	260	H	29.04	6.25	0	94.09	-	-	AV
2402	55.17	119	212	V	29.04	6.25	0	90.46	-	-	PK
2402	54.49	119	212	V	29.04	6.25	0	89.78	-	-	AV
2390	26.68	13	260	H	29.04	6.25	0	61.97	74.00	-12.03	PK
2390	15.23	13	260	H	29.04	6.25	0	50.52	54.00	-3.48	AV
2390	26.45	119	212	V	29.04	6.25	0	61.74	74.00	-12.26	PK
2390	15.16	119	212	V	29.04	6.25	0	50.45	54.00	-3.55	AV
4804	47.40	0	277	H	32.47	8.42	38.56	49.73	74.00	-24.27	PK
4804	36.91	0	277	H	32.47	8.42	38.56	39.24	54.00	-14.76	AV
7206	48.09	186	100	H	36.69	10.21	37.9	57.09	74.00	-16.91	PK
7206	38.89	186	100	H	36.39	10.21	37.9	47.59	54.00	-6.41	AV
7206	46.31	360	217	V	36.69	10.21	37.9	55.31	74.00	-18.69	PK
7206	36.81	360	217	V	36.39	10.21	37.9	45.51	54.00	-8.49	AV
9608	44.55	32	115	H	37.77	11.62	38.29	55.65	74.00	-18.35	PK
9608	33.35	32	115	H	37.77	11.62	38.29	44.45	54.00	-9.55	AV
Middle Channel 2440 MHz											
2440	60.77	353	222	H	29.04	6.22	0	96.03	-	-	PK
2440	60.05	353	222	H	29.04	6.22	0	95.31	-	-	AV
2440	56.45	120	230	V	29.04	6.22	0	91.71	-	-	PK
2440	55.96	120	230	V	29.04	6.22	0	91.22	-	-	AV
4880	48.12	196	152	H	32.64	8.39	38.54	50.61	74.00	-23.39	PK
4880	38.37	196	152	H	32.64	8.39	38.54	40.86	54.00	-13.14	AV
7320	46.34	193	154	H	37.15	10.35	37.90	55.94	74.00	-18.06	PK
7320	34.31	193	154	H	37.15	10.35	37.90	43.91	54.00	-10.09	AV
9760	44.90	0	146	H	37.92	11.55	38.29	56.08	74.00	-17.92	PK
9760	33.59	0	146	H	37.92	11.55	38.29	44.77	54.00	-9.23	AV

Frequency (MHz)	S.A. Reading (dB μ V)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre-Amp. (dB)	Cord. Reading (dB μ V/m)	FCC/ISED		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dB μ V/m)	Margin (dB)	
High Channel 2480 MHz											
2480	60.11	343	269	H	29.41	6.18	0	95.70	-	-	PK
2480	59.59	343	269	H	29.41	6.18	0	95.18	-	-	AV
2480	56.63	85	300	V	29.41	6.18	0	92.22	-	-	PK
2480	56.09	85	300	V	29.41	6.18	0	91.68	-	-	AV
2483.5	26.62	343	269	H	29.41	6.18	0	62.21	74.00	-11.79	PK
2483.5	15.48	343	269	H	29.41	6.18	0	51.07	54.00	-2.93	AV
4960	47.74	173	100	H	32.64	8.35	38.54	50.19	74.00	-23.81	PK
4960	38.65	173	106	H	32.64	8.35	38.54	41.10	54.00	-12.90	AV
7440	47.20	199	100	H	37.14	10.37	37.89	56.82	74.00	-17.18	PK
7440	35.10	199	100	H	37.14	10.37	37.89	44.72	54.00	-9.28	AV
7440	46.67	40	157	V	37.14	10.37	37.89	56.29	74.00	-17.71	PK
7440	33.43	40	157	V	37.14	10.37	37.89	43.05	54.00	-10.95	AV
9920	44.46	0	150	H	37.99	11.45	38.33	55.57	74.00	-18.43	PK
9920	33.18	0	150	H	37.99	11.45	38.33	44.29	54.00	-9.71	AV

7 FCC §15.247(a) (2) and ISED RSS-247 §5.2 - Emission Bandwidth

7.1 Applicable Standards

According to FCC §15.247(a) (2) and ISED RSS-247 §5.2, systems using digital modulation techniques may operate in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

7.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

7.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2017-05-24	13 Months
-	RF cable	-	-	Each time ¹	Each time ¹
-	10 dB attenuator	-	-	Each time ¹	Each time ¹

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

7.4 Test Environmental Conditions

Temperature:	25° C
Relative Humidity:	46 %
ATM Pressure:	101.2 KPa

The testing was performed by Candy Li on 2017-08-08 in RF site.

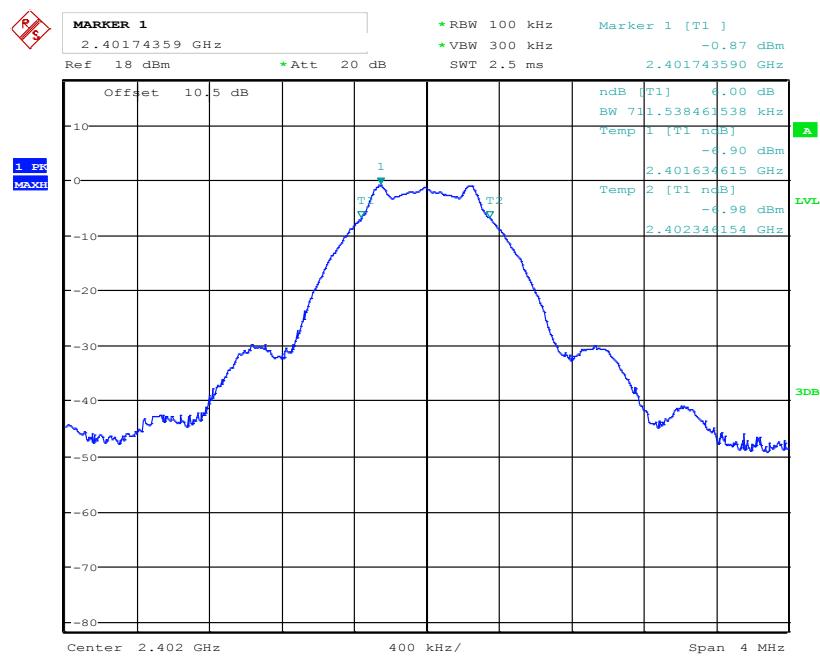
7.5 Test Results

Channel	Frequency (MHz)	99% OBW (kHz)	6 dB OBW (kHz)	Limit (kHz)
BLE				
Low	2402	1057.69	711.54	500
Middle	2440	1057.69	711.54	500
High	2480	1070.51	730.77	500

Please refer to the following plots for detailed test results.

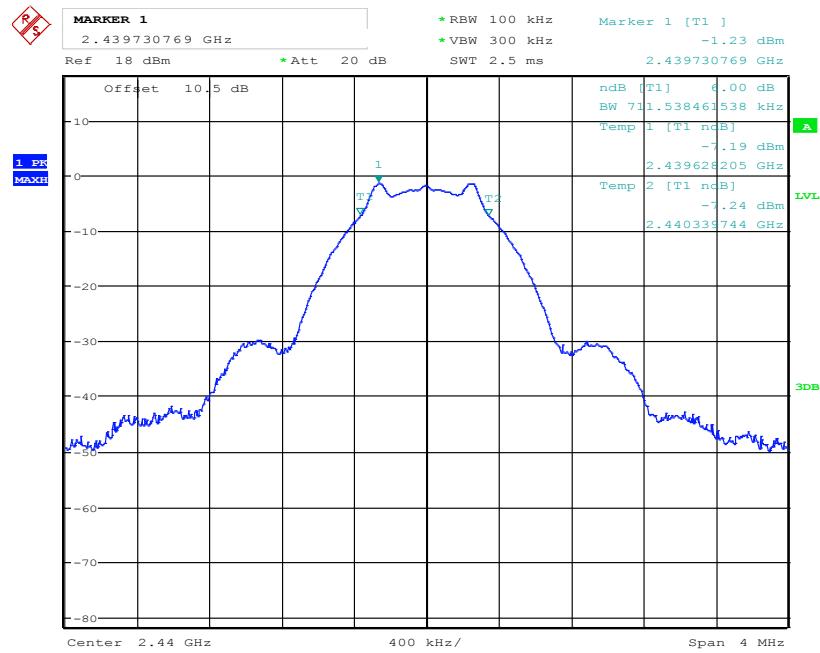
6 dB OBW

Low Channel 2402 MHz

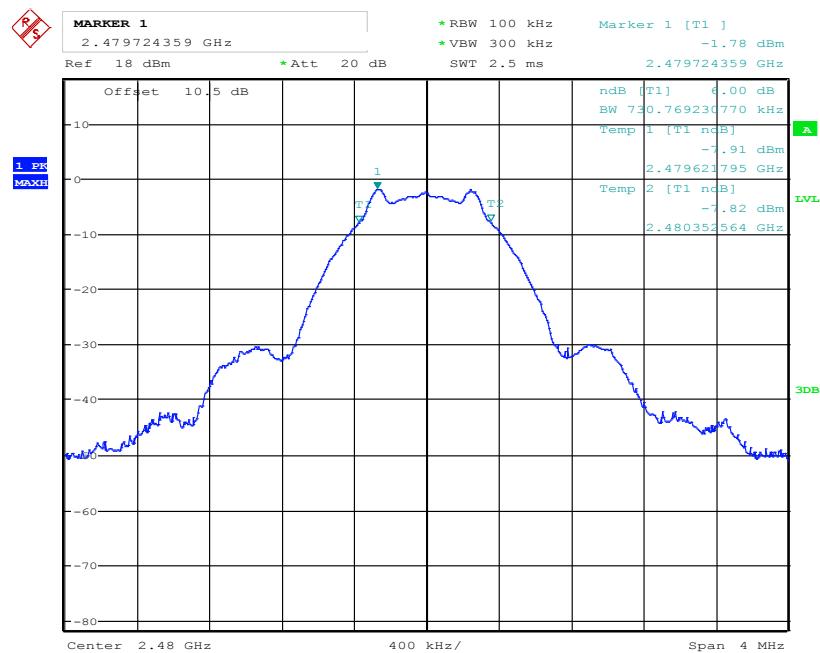


Date: 8.AUG.2017 14:30:40

Middle Channel 2440 MHz

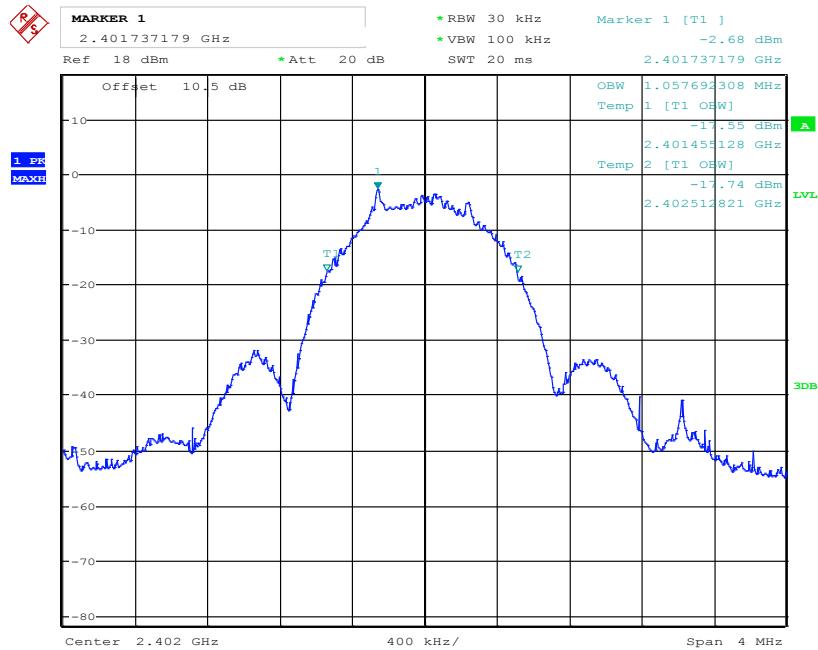


High Channel 2480 MHz



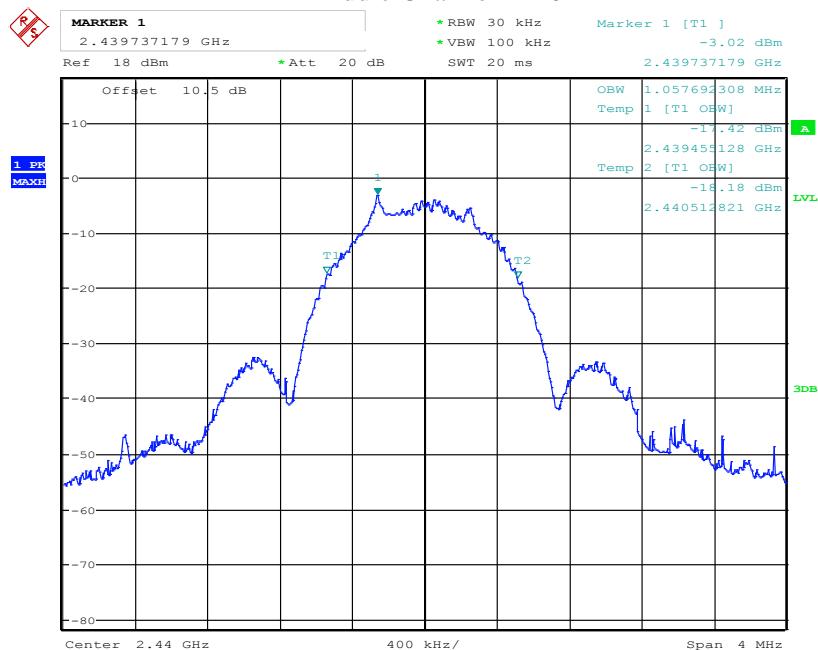
99% OBW

Low Channel 2402 MHz



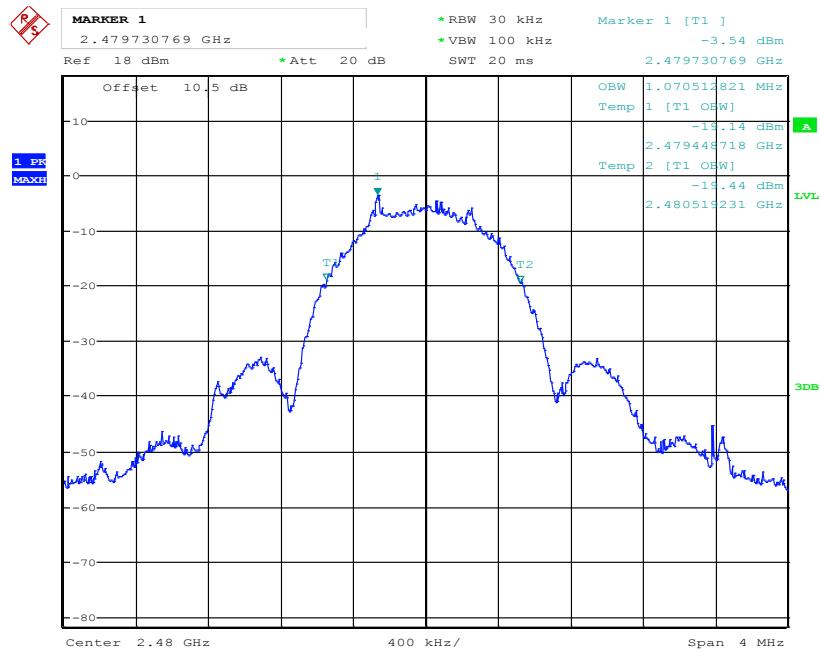
Date: 8.AUG.2017 14:38:30

Middle Channel 2440 MHz



Date: 8.AUG.2017 14:39:47

High Channel 2480 MHz



Date: 8.AUG.2017 14:37:23

8 FCC §15.247(b) (3) and ISED RSS-247 §5.4 (4) - RF Output Power

8.1 Applicable Standards

According to FCC §15.247(b) (3) and ISED RSS-247 §5.4 (4) for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

8.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 9: Fundamental emission output power.

8.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2017-05-24	13 Months
-	RF cable	-	-	Each time ¹	Each time ¹
-	10 dB attenuator	-	-	Each time ¹	Each time ¹

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

8.4 Test Environmental Conditions

Temperature:	25° C
Relative Humidity:	46 %
ATM Pressure:	101.2 KPa

The testing was performed by Candy Li on 2017-08-08 in RF site.

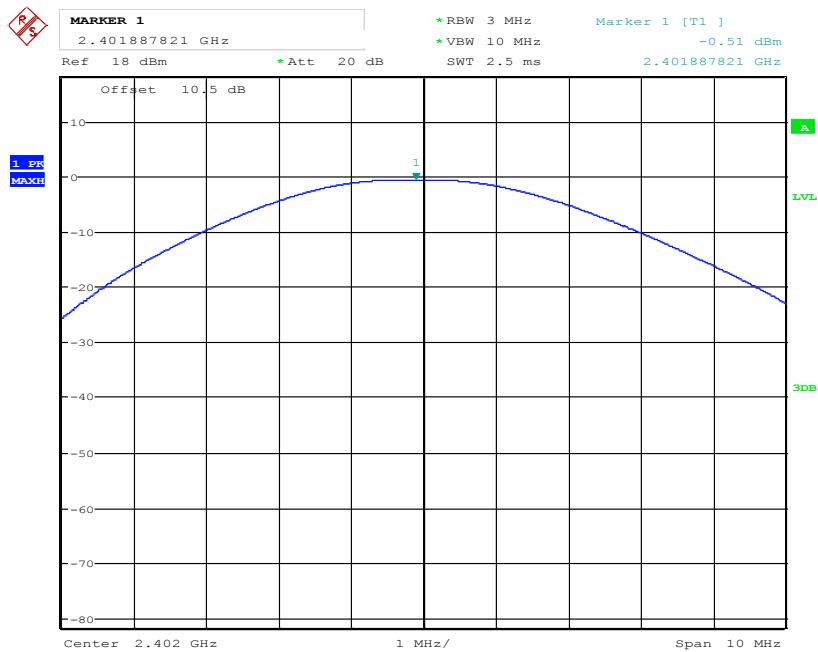
8.5 Test Results

Peak Output Power

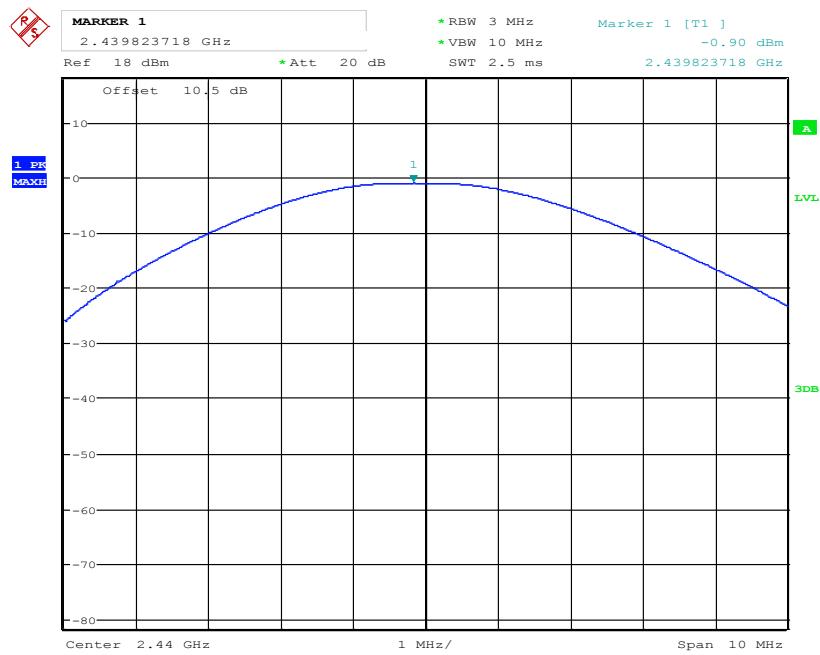
Channel	Frequency (MHz)	Conducted Peak Output Power (dBm)	Limit (dBm)
BLE			
Low	2402	-0.51	30
Middle	2440	-0.9	30
High	2480	-1.36	30

Please refer to the following plots for detailed test results.

Low Channel 2402 MHz

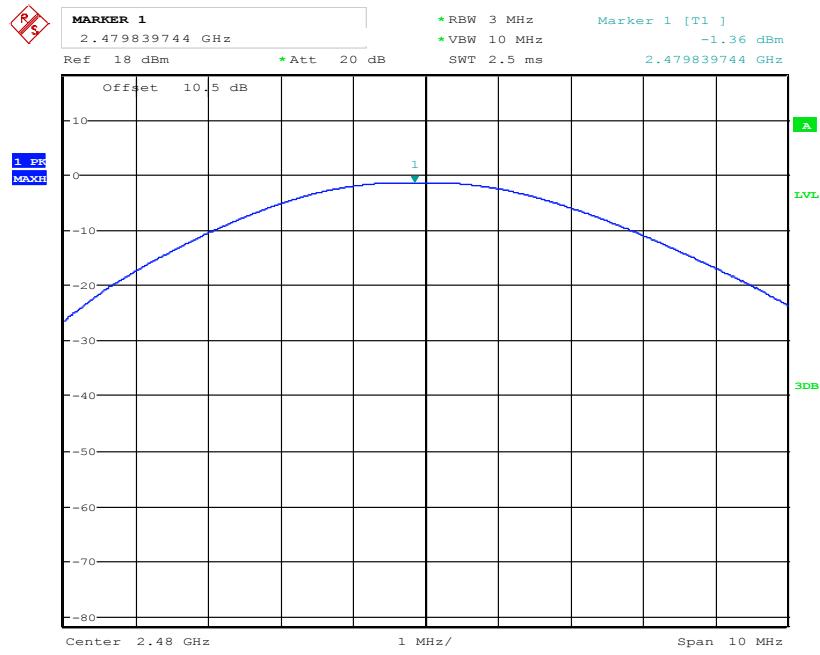


Middle Channel 2440 MHz



Date: 8.AUG.2017 14:24:31

High Channel 2480 MHz



Date: 8.AUG.2017 14:23:46

9 FCC §15.247(d) and ISED RSS-247 §5.5 - 100 kHz Bandwidth of Band Edges

9.1 Applicable Standards

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

According to ISED RSS-247 §5.5. In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 13: Band-edge measurements

9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2017-05-24	13 Months
-	RF cable	-	-	Each time ¹	Each time ¹
-	10 dB attenuator	-	-	Each time ¹	Each time ¹

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

9.4 Test Environmental Conditions

Temperature:	25° C
Relative Humidity:	46 %
ATM Pressure:	101.2 KPa

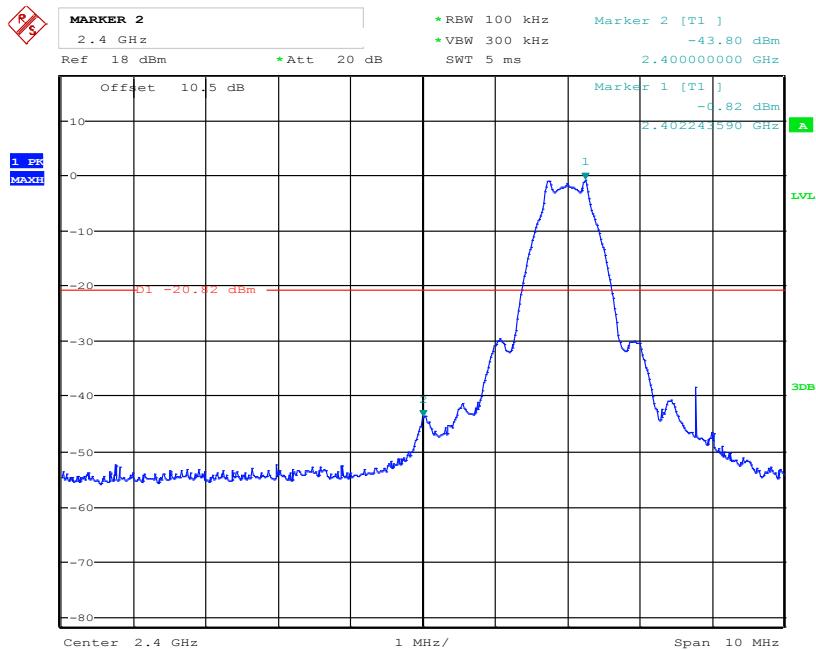
The testing was performed by Candy Li on 2017-08-08 in RF site.

9.5 Test Results

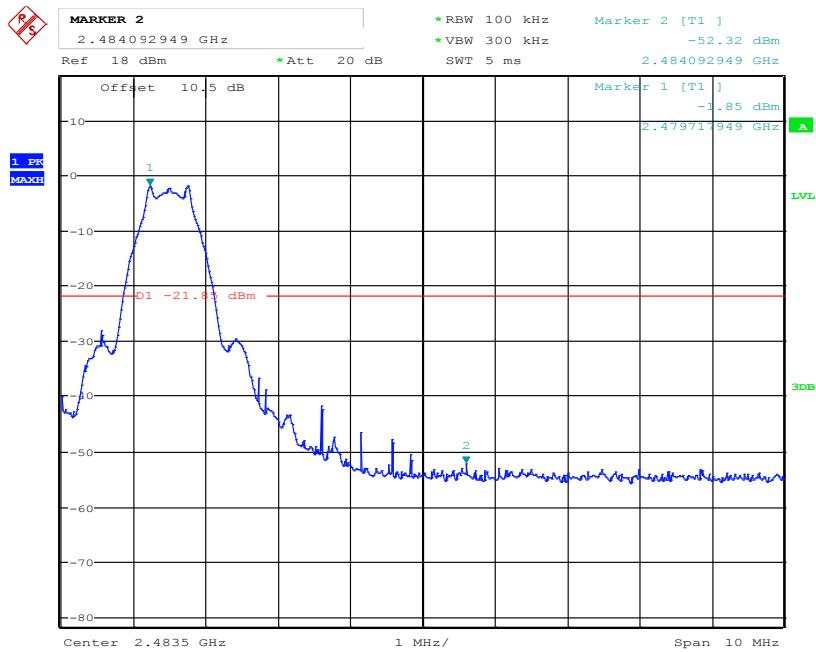
Please refer to the following plots.

BLE

Left Band (2402 MHz)



High Channel (2480 MHz)



Date: 8.AUG.2017 14:52:00

10 FCC §15.247(e) and ISED RSS-247 §5.2(2) – Power Spectral Density

10.1 Applicable Standards

According to FCC §15.247(e) and ISED RSS-247 §5.2 (2) , for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

10.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v04: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 10: Maximum power spectral density level in the fundamental emission.

10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2017-05-24	13 Months
-	RF cable	-	-	Each time ¹	Each time ¹
-	10 dB attenuator	-	-	Each time ¹	Each time ¹

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

10.4 Test Environmental Conditions

Temperature:	25° C
Relative Humidity:	46 %
ATM Pressure:	101.2 KPa

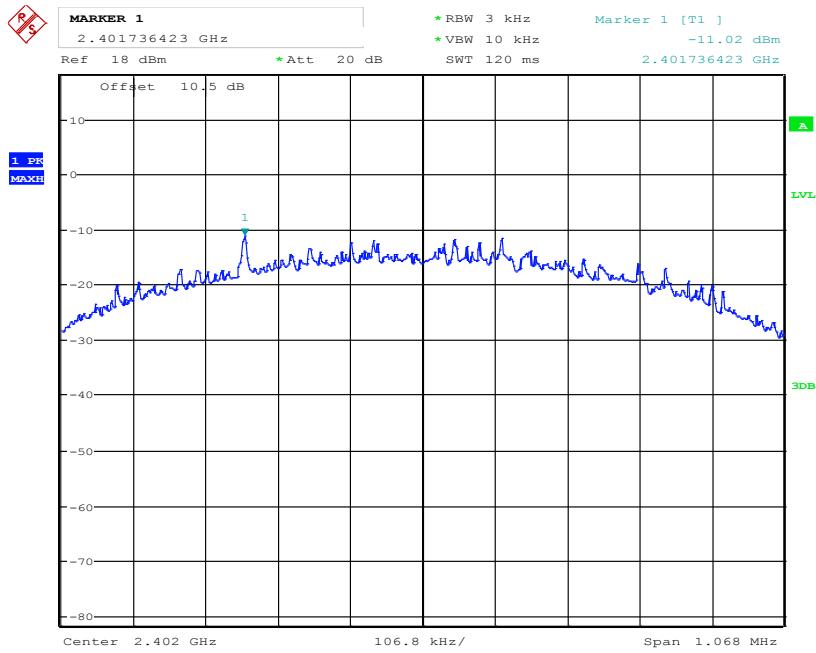
The testing was performed by Candy Li on 2017-08-08 in RF site.

10.5 Test Results

Channel	Frequency (MHz)	PSD (dBm/3 kHz)	Limit (dBm/3 kHz)
BLE			
Low	2402	-11.02	8
Middle	2440	-10.71	8
High	2480	-11.48	8

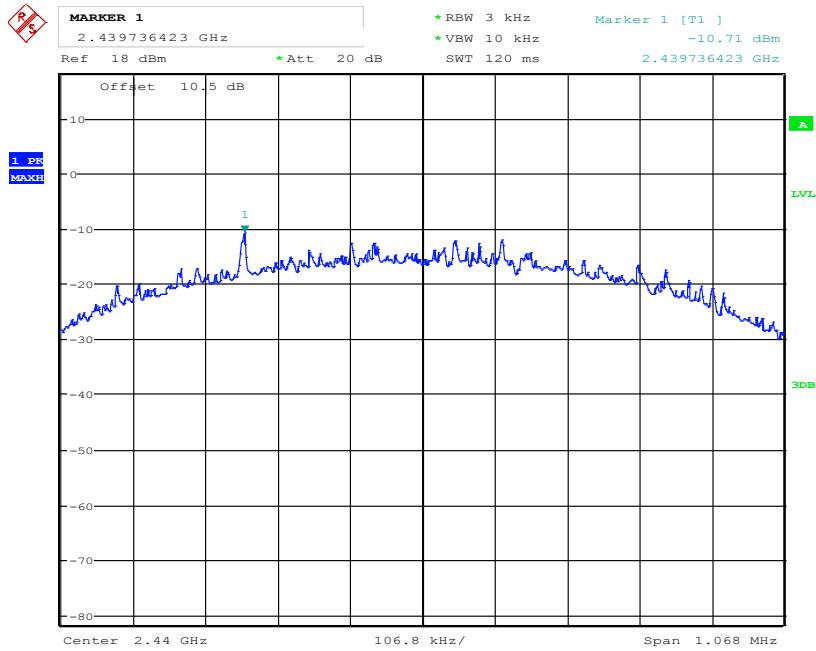
Please refer to the following plots for detailed test results

Low Channel 2402 MHz



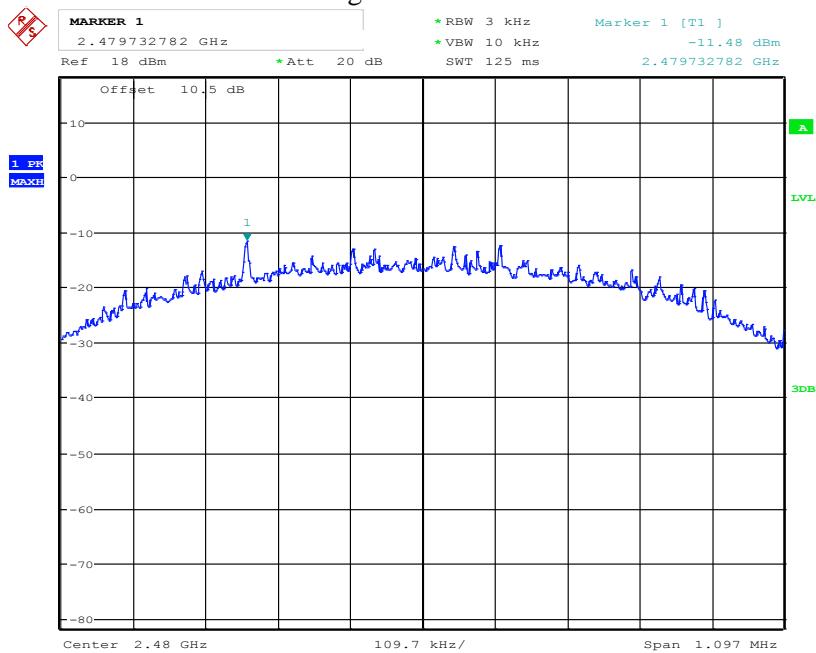
Date: 8.AUG.2017 14:45:12

Middle Channel 2440 MHz



Date: 8.AUG.2017 14:43:14

High Channel 2480 MHz



Date: 8.AUG.2017 14:48:25

11 FCC §15.247(d) and ISED RSS-247 §5.5, RSS-Gen §8.9 - Spurious Emissions at Antenna Terminals

11.1 Applicable Standards

For FCC §15.247(d) 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)).

As per ISED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

11.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2017-05-24	13 Months
-	RF cable	-	-	Each time ¹	Each time ¹
-	10 dB attenuator	-	-	Each time ¹	Each time ¹

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

11.4 Test Environmental Conditions

Temperature:	25° C
Relative Humidity:	46 %
ATM Pressure:	101.2 KPa

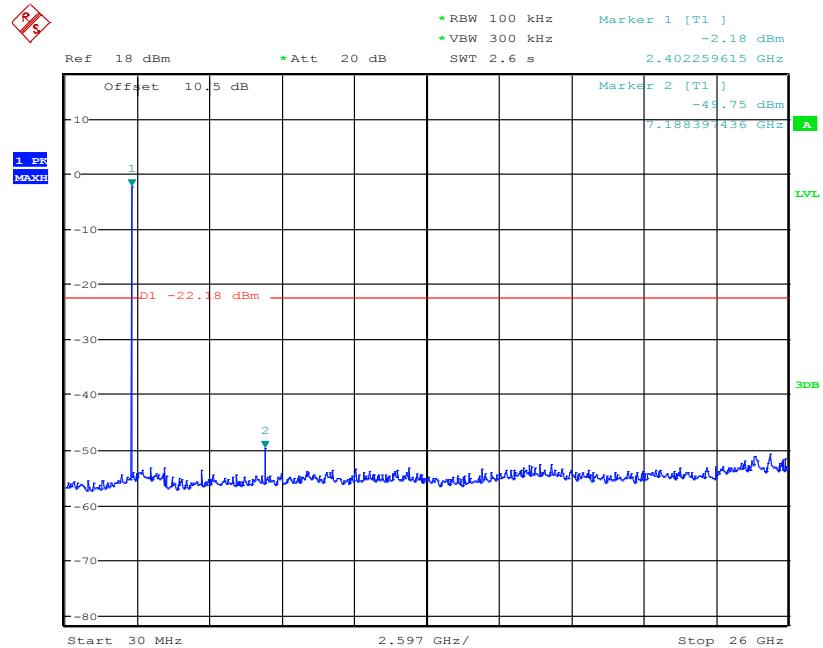
The testing was performed by Candy Li on 2017-08-08 in RF site.

11.5 Test Results

Please refer to following plots.

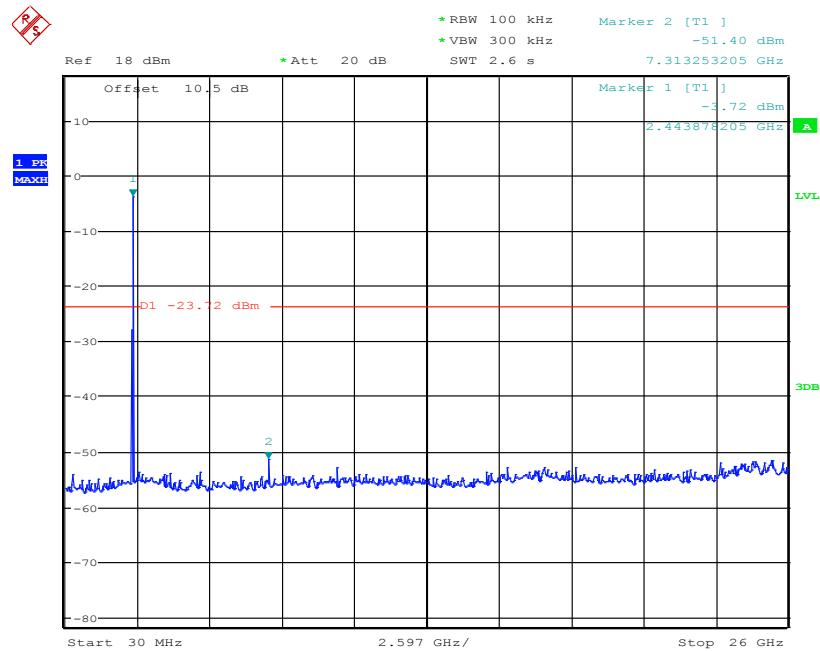
BLE

Low Channel 30 MHz – 26 GHz



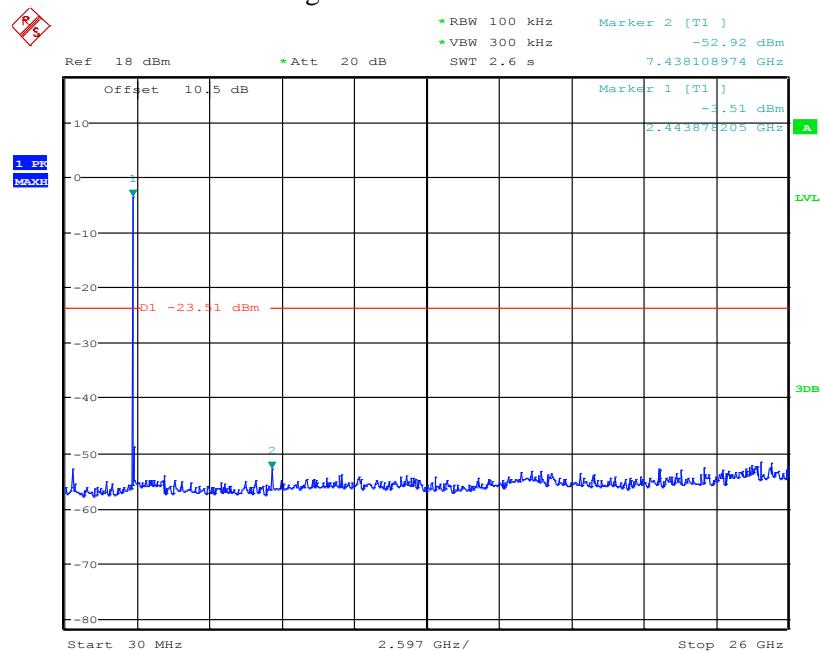
Date: 8.AUG.2017 15:05:49

Middle Channel 30 MHz – 26 GHz



Date: 8.AUG.2017 15:06:44

High Channel 30 MHz – 26 GHz



Date: 8.AUG.2017 15:13:00

12 Annex D (Informative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

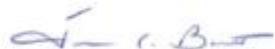
Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 General requirements for the competence of testing and calibration laboratories. This laboratory also meets the requirements of A2LA R222 - Specific Requirements - EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system [refer to joint ISO-ILAC-IAF Communiqué dated 8 January 2009].

Presented this 30th day of August 2016.

A handwritten signature in black ink, appearing to read 'Shirley Burt'.

Senior Director of Quality & Communications
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2018

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.



---END OF REPORT ---