



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

TEST AND MEASUREMENT REPORT

For

KHN Solutions, Inc.

3000 Broadway #26,

San Francisco, CA 94133, USA

FCC ID: S8B-C8
IC: 10935A-C8

Report Type: Original Report	Product Type: Breathalyzer
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* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk “*” 08/12

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1801224-247 BLE	Original Report	2018-03-13

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-C8*, FCC ID: S8B-C8, IC: 10935A-C8: or the “EUT” as referred to in this report. It is a Breathalyzer with Bluetooth Low Energy.

1.2 Mechanical Description of EUT

The EUT measures approximately 5.62 cm (L) x 3.45 cm (W) x 1.68 cm (H) and weight 25 g.

The test data gathered are from typical production sample, serial number: R1801224-01 and R1801224-02 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 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 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.7 Test Facility Registrations

BACLs 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;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- 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

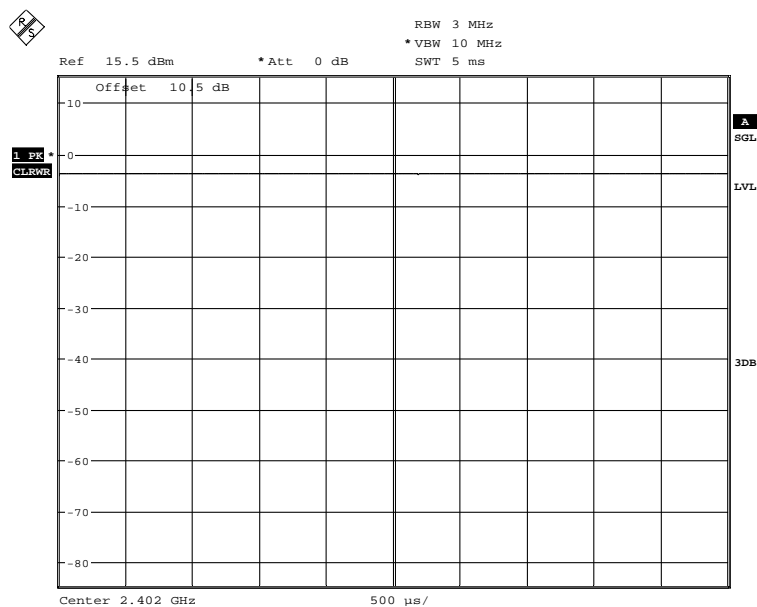
According to KDB 558074 D01 DTS Meas Guidance v04 section 6.0:

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	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
BLE	100	0

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

Please refer to the following plots.



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2.4 Equipment Modifications

N/A

2.5 Local Support Equipment

N/A

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	< 1 m	EUT	PSA

3 Summary of Test Results

Results reported relate only to the product tested.

FCC and ISSED 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 device only employ battery power for operation, AC line conducted emissions testing is not required.

4 FCC §15.203 & 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 a chip antenna.

Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
BLE Chip	2400-2500	2

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

5.1 Applicable Standards

According to FCC KDB 447498 D01 General RF Exposure Guidance v05r02 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

- 1) 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:

$$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:
- a) $[\text{Power allowed at numeric threshold for 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot (f(\text{MHz})/150)] \text{ mW}$, at 100 MHz to 1500 MHz
 - b) $[\text{Power allowed at numeric threshold for 50 mm in step 1}) + (\text{test separation distance} - 50 \text{ mm}) \cdot 10] \text{ mW}$ at > 1500 MHz and ≤ 6 GHz
- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:
- a) The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm
 - b) The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm

- c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

According to ISED 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

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	101	132	162	193
450	52	70	88	106	123
835	17	30	42	55	67
1900	7	10	18	34	60
2450	4	7	15	30	52
3500	2	6	16	32	55
5800	1	6	15	27	41

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	254	284	315	345
450	141	159	177	195	213
835	80	92	105	117	130
1900	99	153	225	316	431
2450	83	123	173	235	309
3500	86	124	170	225	290
5800	56	71	85	97	106

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.

5.2 RF Exposure Evaluation Results

The highest measured conducted power as reported in Section 8.5 of this report was -3.7 dBm (0.427 mW) at 2402 MHz.

For FCC, based on the $[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

$(0.427/5) \cdot \sqrt{2.402} = 0.132$ which is less than 3.0

For ISED, based on table 1, the max EIRP power -1.7 dBm (0.676 mW) is less than 4mW.

Conclusion:

The maximum average output power is lower than both FCC and ISED SAR Exemption limit. Thus, SAR was exempted for this device.

6 FCC §15.209, §15.247(d) & ISSED 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 ISSED 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 ($\mu\text{V/m}$ 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 ISSED 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 ISSED 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:

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

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW > 1/T Hz / Sweep = 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:

$$CA = Ai + AF + CL + Atten - Ga$$

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	E4446A	US44300386	2017-04-20	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2015-07-11	31 months
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2017-03-27	2 years
Agilent	Pre-Amplifier	8447D	2944A07030	2017-05-17	1 year
IW	AOBOR Hi frequency Co AX Cable	DC 1531	KPS-1501A3960KPS	2017-08-05	1 year
-	SMA cable	-	C0002	Each time ¹	N/A
-	N-Type Cable	-	C00012	Each time ¹	N/A
-	N-Type Cable	-	C00014	Each time ¹	N/A
Agilent	Pre-Amplifier	8449B	3147A00400	2017-06-15	1 year
Wisewave	Antenna, Horn	ARH-4223-02	10555-01	2015-10-22	28 months
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:	20-22 °C
Relative Humidity:	42-46 %
ATM Pressure:	102 kPa

Testing was performed by Troy Pandhumsoporn on 2018-01-23 at 5m3 Chamber

6.7 Summary of Test Results

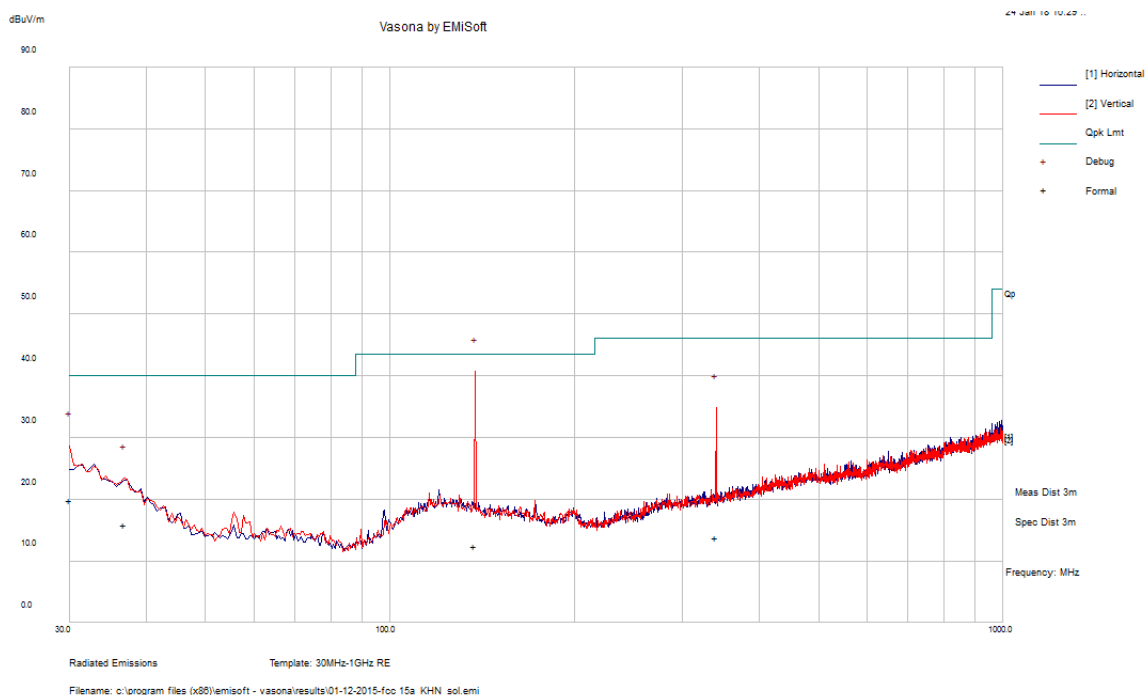
According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISED RSS-247 standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Scan range
-4.6	7206	Horizontal	30 MHz – 25 GHz

Please refer to the following table and plots 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 (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
137.579	12.4	270	V	289	43.5	-31.1	QP
340.165	13.78	342	V	163	46	-32.22	QP
30	19.87	101	V	156	40	-20.13	QP
36.8495	15.96	177	V	13	40	-24.04	QP

2) 1–25 GHz, Measured at 3 meters

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC/ISED		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel 2402 MHz											
2402	48.46	202	300	H	28.94	5.76	0	83.16	-	-	PK
2402	47.54	202	300	H	28.94	5.76	0	82.24	-	-	AV
2402	40.47	89	100	V	28.93	5.76	0	75.16	-	-	PK
2402	38.53	89	100	V	28.93	5.76	0	73.22	-	-	AV
2390	47.68	0	100	H	28.94	6.49	36.588	46.53	74.00	-27.47	PK
2390	35.27	0	100	H	28.94	6.49	36.588	34.12	54.00	-19.88	AV
2390	47.70	90	100	V	28.93	6.49	36.588	46.53	74.00	-27.47	PK
2390	35.40	90	100	V	28.93	6.49	36.588	34.23	54.00	-19.77	AV
4804	49.46	332	154	H	32.54	9.36	38.361	53.00	74.00	-21.00	PK
7206	47.45	309	154	H	36.73	12.01	36.38	59.80	74.00	-14.20	PK
7206	37.05	309	154	H	36.73	12.01	36.38	49.40	54.00	-4.60	AV
Middle Channel 2440 MHz											
2440	50.06	204	292	H	29.15	5.76	0.00	84.97	-	-	PK
2440	48.97	204	292	H	29.15	5.76	0.00	83.88	-	-	AV
2440	40.78	80	100	V	29.19	5.76	0.00	75.73	-	-	PK
2440	38.52	80	100	V	29.19	5.76	0.00	73.47	-	-	AV
4880	46.00	0	100	H	32.81	9.46	36.33	51.94	74.00	-22.06	PK
7320	44.53	0	100	H	37.06	11.97	36.40	57.15	74.00	-16.85	PK
7320	32.12	0	100	H	37.06	11.97	36.40	44.74	54.00	-9.26	AV
High Channel 2480 MHz											
2480	47.03	196	253	H	29.25	5.76	0.00	82.04	-	-	PK
2480	45.67	196	253	H	29.25	5.76	0.00	80.68	-	-	AV
2480	40.52	83	100	V	29.18	5.76	0.00	75.46	-	-	PK
2480	37.96	83	100	V	29.18	5.76	0.00	72.90	-	-	AV
2483.5	46.30	0	100	H	29.25	6.51	36.59	45.47	74.00	-28.53	PK
2483.5	46.94	0	100	V	29.18	6.51	36.59	46.04	74.00	-27.96	PK
4960	46.74	0	100	H	32.78	9.46	36.28	52.70	74.00	-21.30	PK
7440	45.54	0	100	H	37.07	12.01	36.41	58.22	74.00	-15.78	PK
7440	32.82	0	100	H	37.07	12.01	36.41	45.50	54.00	-8.50	AV

7 FCC §15.247(a) (2) & ISSED RSS-247 §5.2 - Emission Bandwidth

7.1 Applicable Standards

According to FCC §15.247(a) (2) and ISSED 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	2017-06-08	2 years
-	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:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.5 KPa

Testing was performed by Vincent Licata on 2018-01-23 at the RF site.

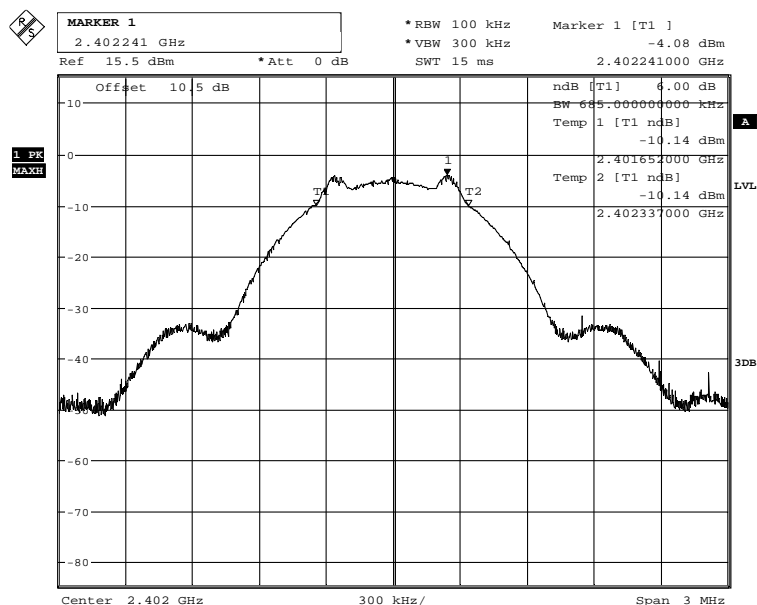
7.5 Test Results

Channel	Frequency (MHz)	99% OBW (kHz)	6 dB Bandwidth (kHz)	Limit (kHz)
BLE				
Low	2402	1057.0	685.0	500
Middle	2440	1059.0	698.0	500
High	2480	1062.0	724.0	500

Please refer to the following plots for detailed test results.

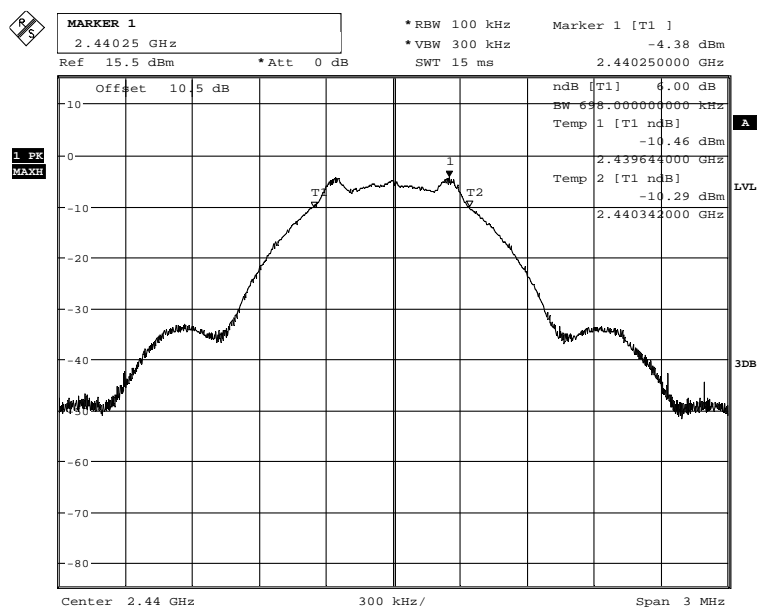
6 dB Emission Bandwidth

Low Channel 2402 MHz



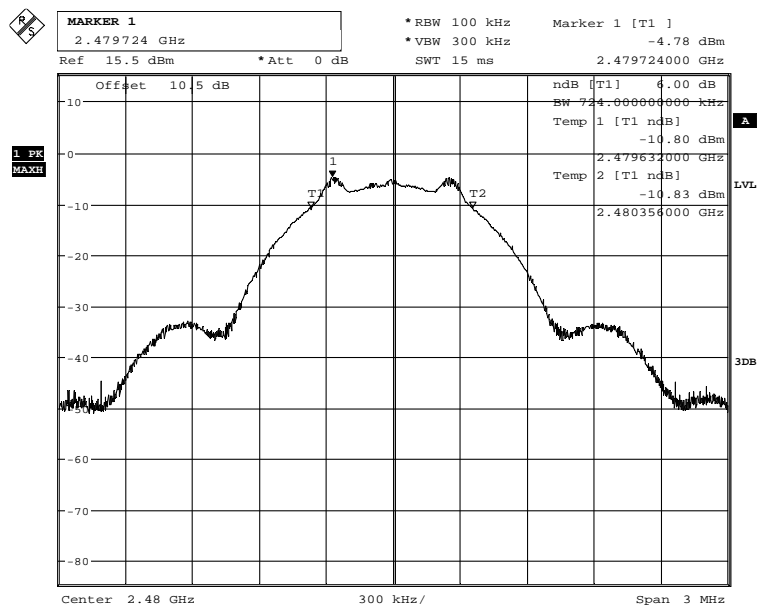
Date: 23.JAN.2018 11:12:07

Middle Channel 2440 MHz



Date: 23.JAN.2018 11:10:19

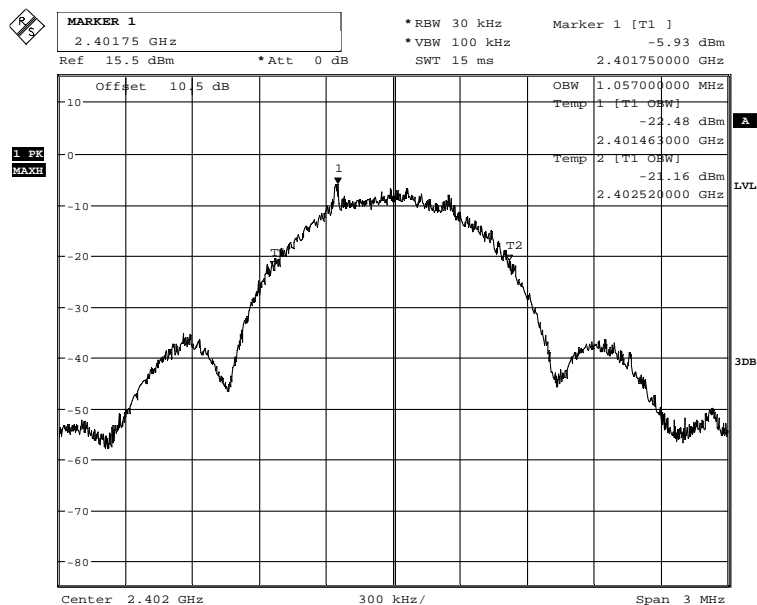
High Channel 2480 MHz



Date: 23.JAN.2018 11:11:10

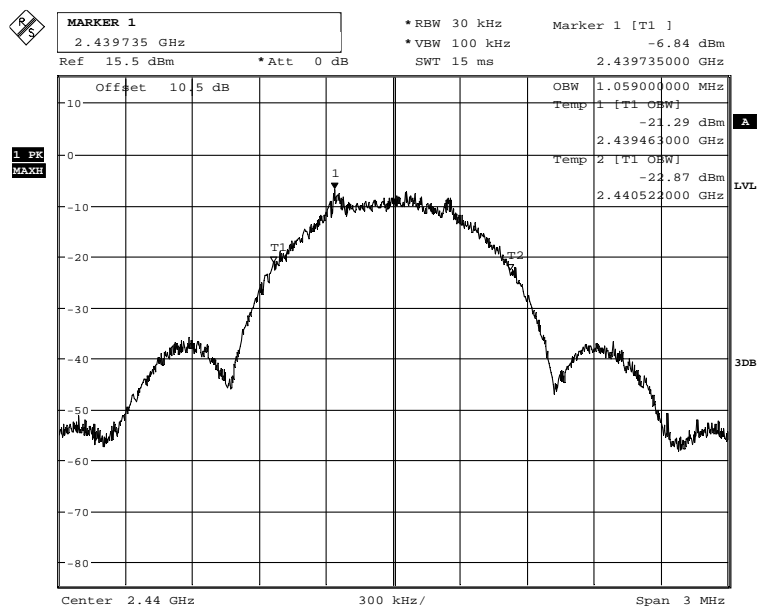
99% Emission Bandwidth

Low Channel 2402 MHz



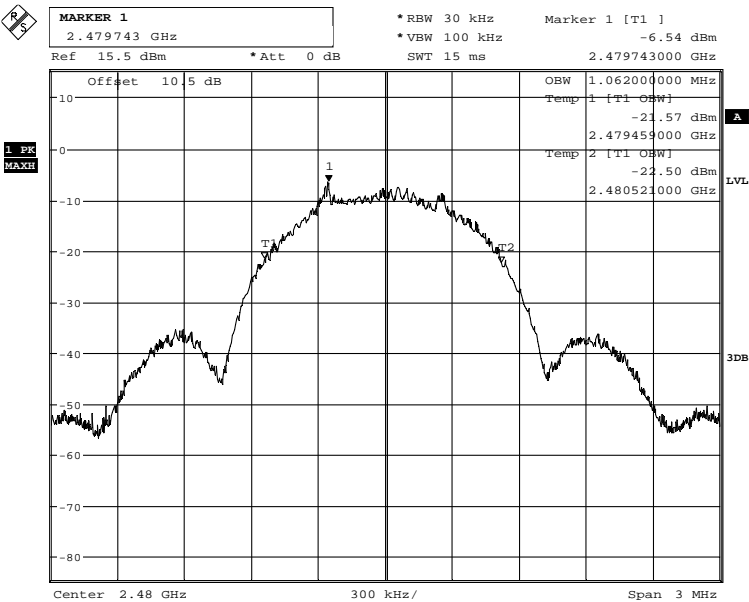
Date: 23.JAN.2018 11:07:46

Middle Channel 2440 MHz



Date: 23.JAN.2018 11:08:37

High Channel 2480 MHz



Date: 23.JAN.2018 11:06:45

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

8.1 Applicable Standards

According to FCC §15.247(b) (3) and ISSED 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	2017-06-08	2 years
-	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:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.5 KPa

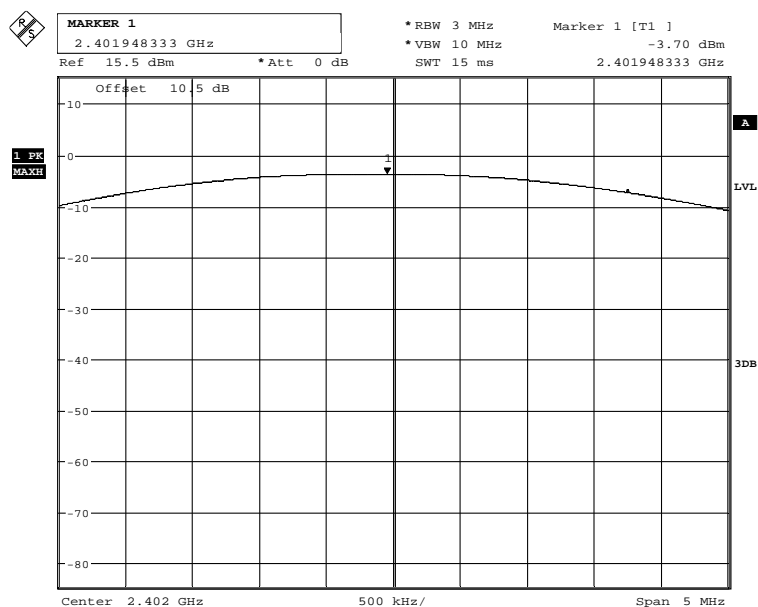
Testing was performed by Vincent Licata on 2018-01-23 at the RF site.

8.5 Test Results

Channel	Frequency (MHz)	Conducted Peak Output Power (dBm)	Limit (dBm)
Low	2402	-3.70	30
Middle	2440	-4.11	30
High	2480	-4.54	30

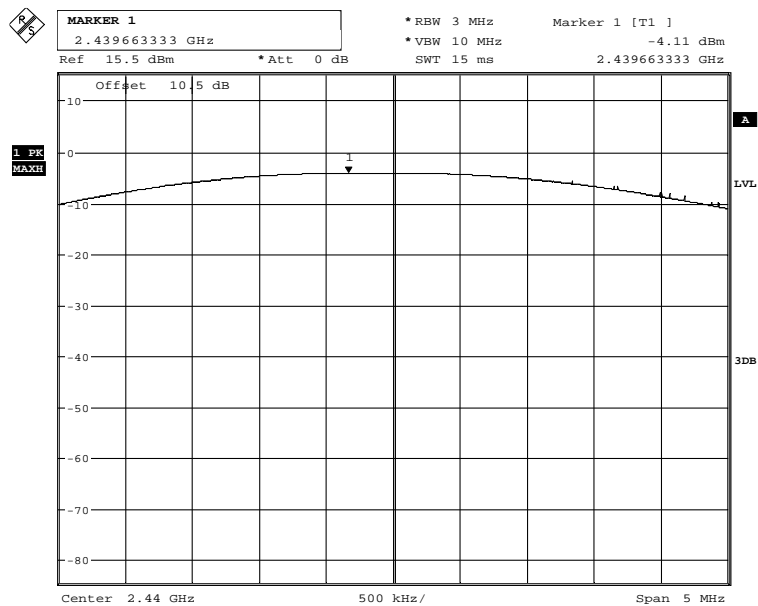
Please refer to the following plots for detailed test results.

Low Channel 2402 MHz



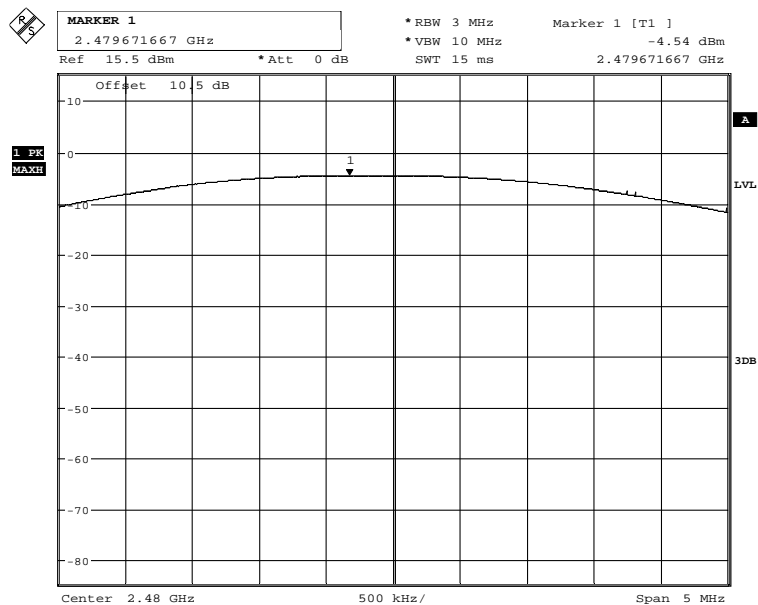
Date: 23.JAN.2018 10:38:47

Middle Channel 2440 MHz



Date: 23.JAN.2018 10:41:07

High Channel 2480 MHz



Date: 23.JAN.2018 10:41:51

9 FCC §15.247(d) & ISSED 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 ISSED 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	2017-06-08	2 years
-	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

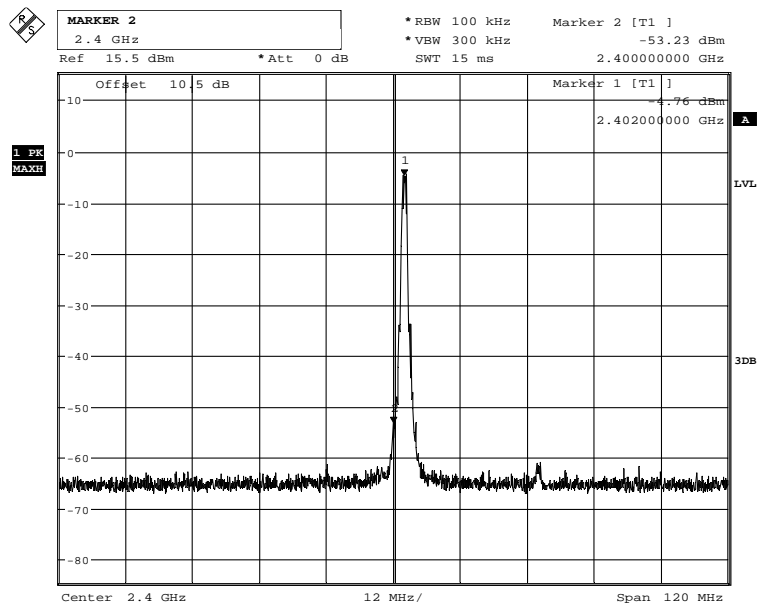
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.5 KPa

Testing was performed by Vincent Licata on 2018-01-23 at the RF site.

9.5 Test Results

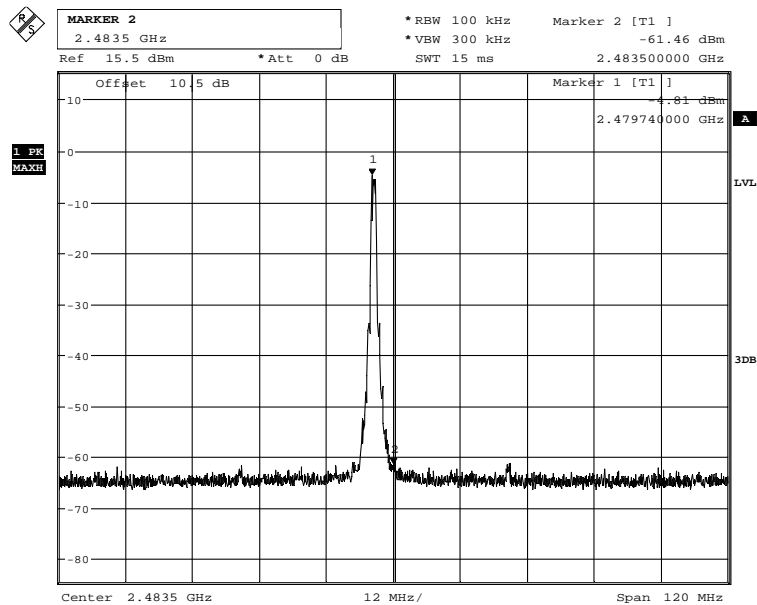
Please refer to the following plots.

Low Channel 2402 MHz



Date: 23.JAN.2018 11:19:26

High Channel 2480 MHz



Date: 23.JAN.2018 11:17:50

10 FCC §15.247(e) & ISSED RSS-247 §5.2(2) - Power Spectral Density

10.1 Applicable Standards

According to FCC §15.247(e) and ISSED 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	2017-06-08	2 years
-	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:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.5 KPa

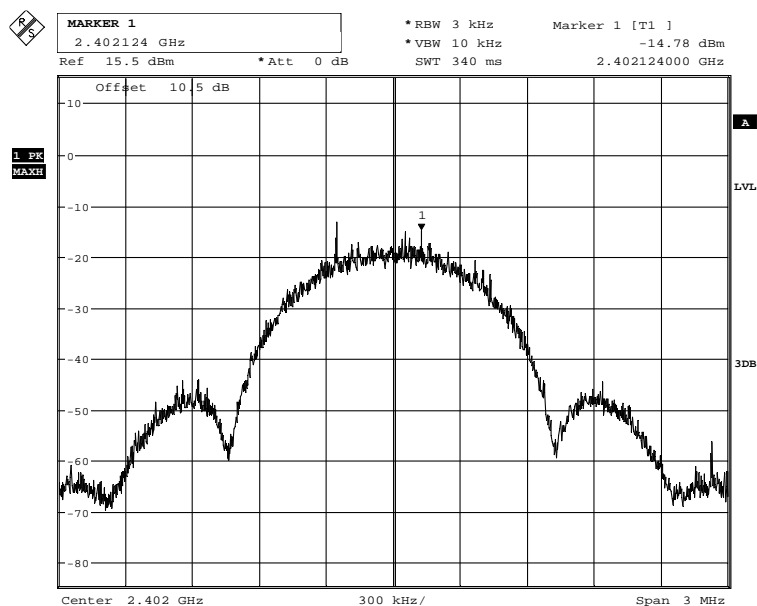
Testing was performed by Vincent Licata on 2018-01-23 at the RF site.

10.5 Test Results

Channel	Frequency (MHz)	PSD (dBm/3 kHz)	Limit (dBm/3 kHz)
Low	2402	-14.78	8
Middle	2440	-15.34	8
High	2480	-15.63	8

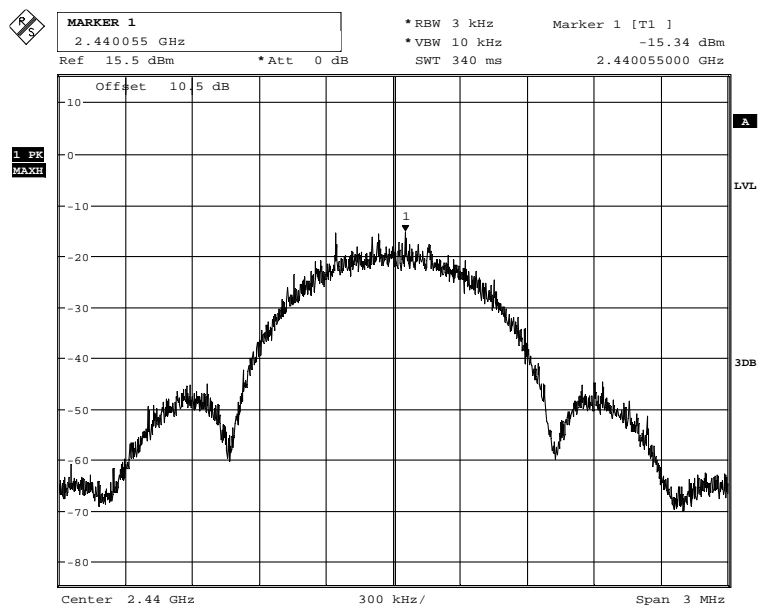
Please refer to the following plots for detailed test results

Low Channel 2402 MHz



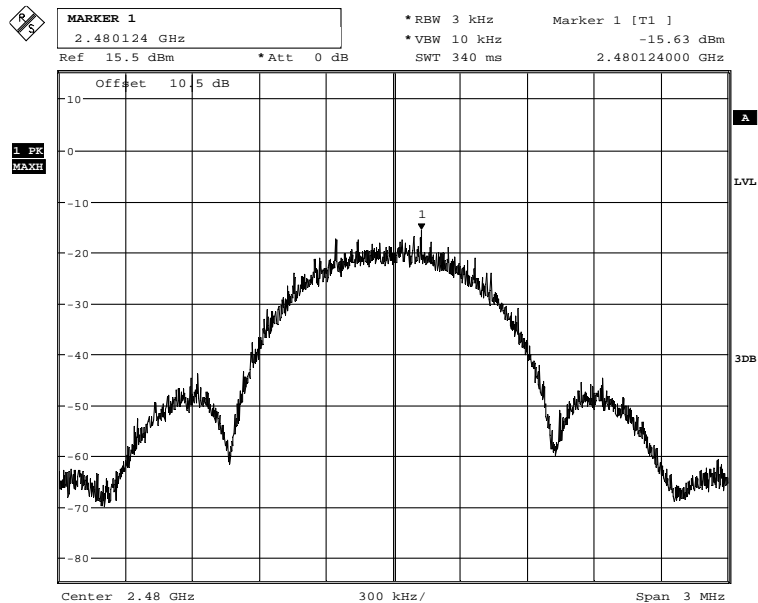
Date: 23.JAN.2018 11:13:19

Middle Channel 2440 MHz



Date: 23.JAN.2018 11:14:00

High Channel 2480 MHz



Date: 23.JAN.2018 11:14:36

11 FCC §15.247(d) & 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	2017-06-08	2 years
-	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

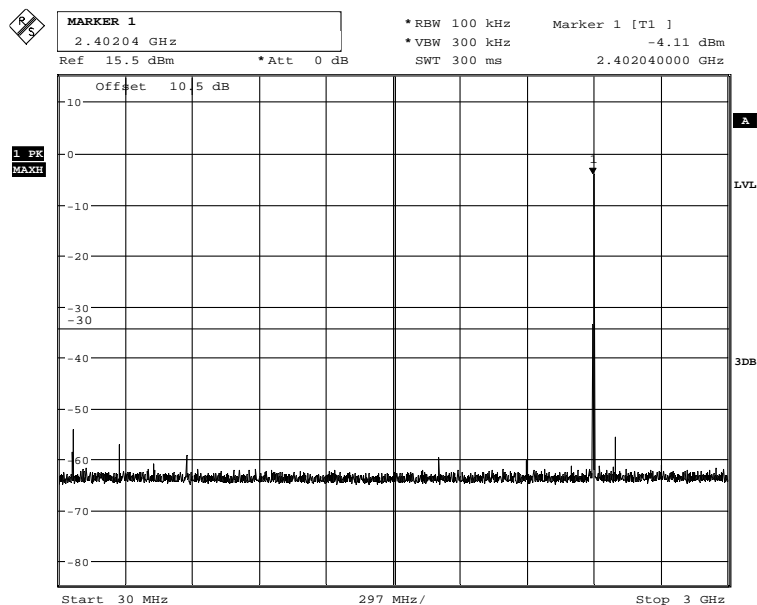
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.5 KPa

Testing was performed by Vincent Licata on 2018-01-23 at the RF site.

11.5 Test Results

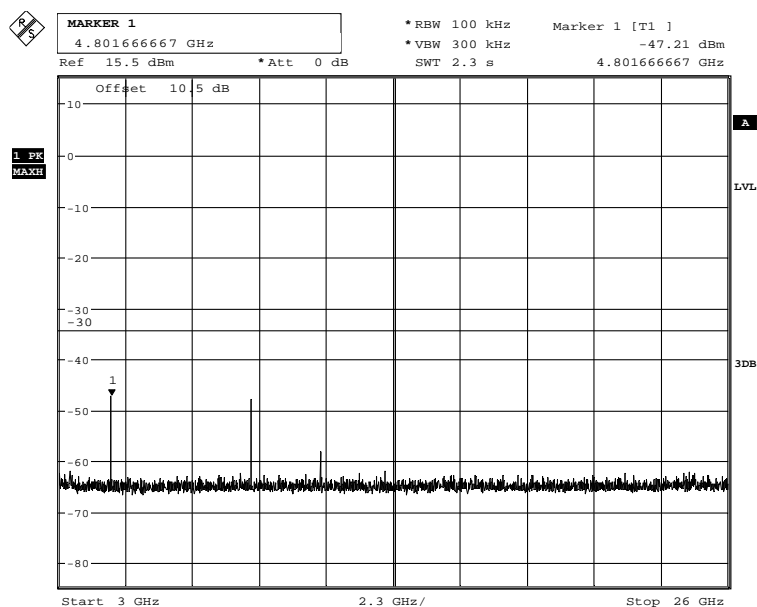
Please refer to following plots.

Low Channel 30 MHz – 3 GHz



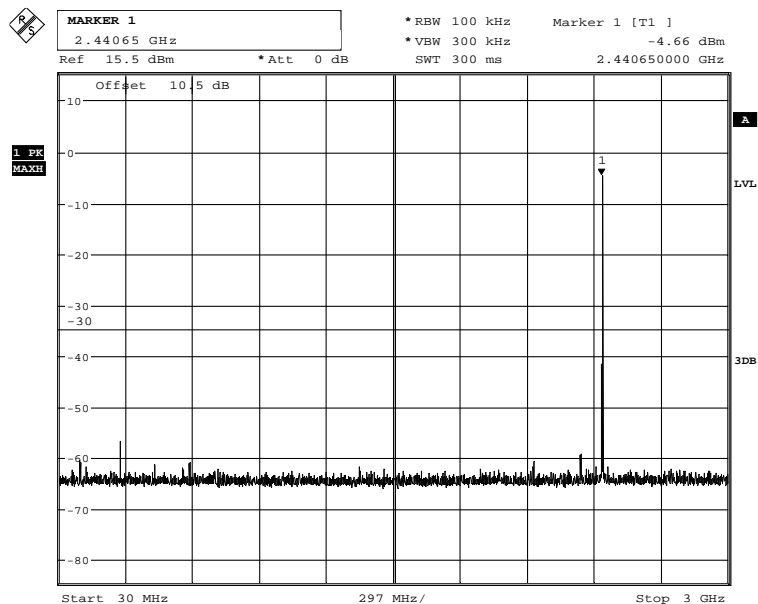
Date: 23.JAN.2018 11:27:20

Low Channel 3 GHz – 26 GHz



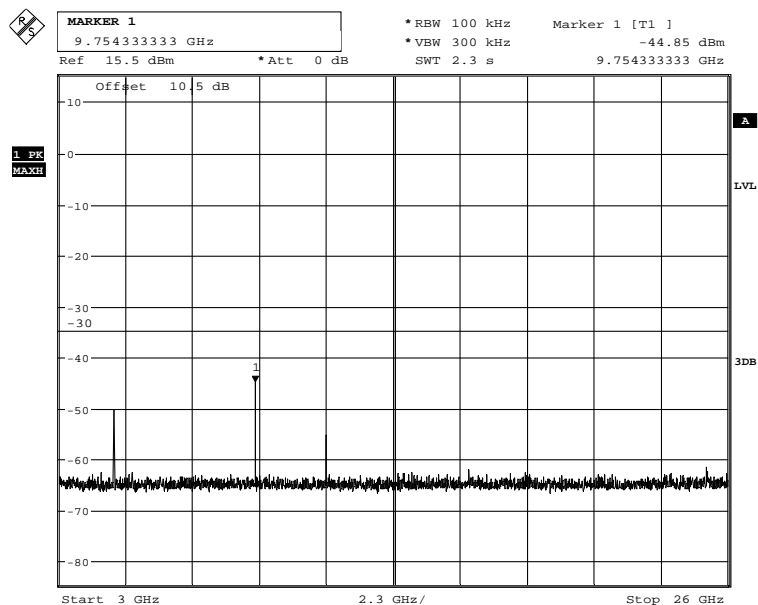
Date: 23.JAN.2018 11:29:02

Middle Channel 30 MHz – 3 GHz



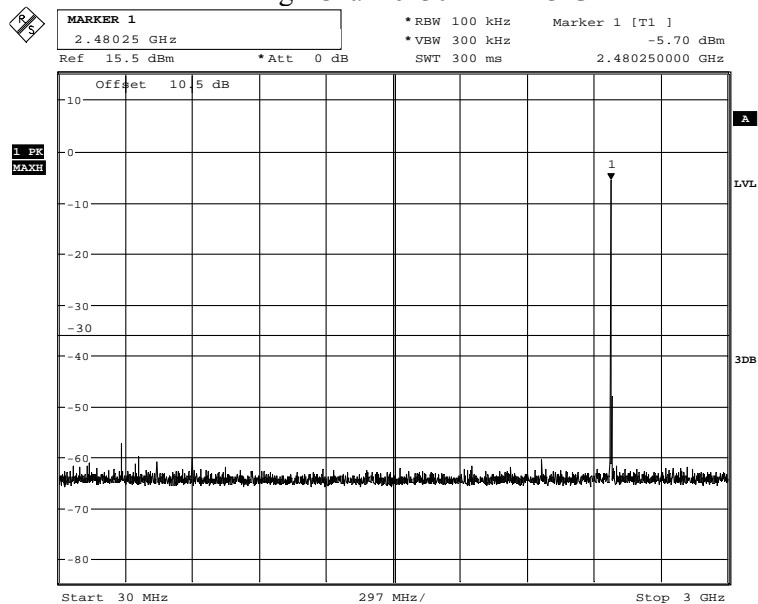
Date: 23.JAN.2018 11:30:46

Middle Channel 3 GHz – 26 GHz



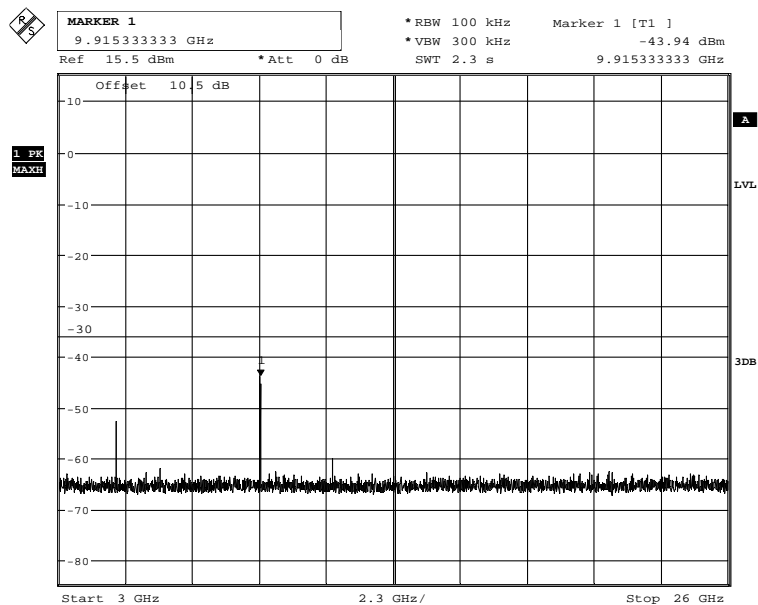
Date: 23.JAN.2018 11:31:55

High Channel 30 MHz – 3 GHz



Date: 23.JAN.2018 11:33:45

High Channel 3 GHz – 26 GHz



Date: 23.JAN.2018 11:34:26

12 Annex A (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 blue ink, appearing to read 'J. C. 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.

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