Keenway Industries Ltd.

Application
For
Certification
(FCC ID: SY2-13403-4-2008)

Transmitter

Sample Description : Remote Fun Robot
Model : 13403
Additional Model : 13404
Asst. No. : 13403-4

We hereby certify that the sample of the above item is considered to comply with the requirements of FCC Part 15, Subpart C for Intentional Radiator,
mention 47 CFR [4-5-2007]

HK08051134-1
BH/at
June 23, 2008

- The test results reported in this report shall refer only to the sample actually tested and shall not refer or be deemed to refer to bulk from which such a sample may be said to have been obtained.
- This report shall not be reproduced except in full without prior authorization from Intertek Testing Services Hong Kong Limited.
- The evaluation data of the report will be kept for 3 years from the date of issuance.

FCC ID : SY2-13403-4-2008

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MEASUREMENT/TECHNICAL REPORT

Keenway Industries Ltd. - MODEL: 13403
FCC ID: SY2-13403-4-2008

June 23, 2008

This report concerns (check one:) Original Grant_X__ Class II Change___

Equipment Type: Low Power Transmitter

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes___ No_X__

If yes, defer until: _____
date

Company Name agrees to notify the Commission by: _____
date

of the intended date of announcement of the product so that the grant can be issued on that date.

Transition Rules Request per 15.37? Yes_____ No_X___

If no, assumed Part 15, Subpart C for intentional radiator - the new 47 CFR [4-5-2007 Edition] provision.

Report prepared by:

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List of attached file

Exhibit type	File Description	filename
Test Report	Test Report	report.pdf
Cover Letter	Letter of Agency	letter.pdf
Operation Description	Technical Description	descri.pdf
Test Setup Photo	Radiated Emission	radiated photos.pdf
Test Report	Bandwidth Plot	bw.pdf
External Photo	External Photo	external photos.pdf
Internal Photo	Internal Photo	internal photos.pdf
Block Diagram	Block Diagram	block.pdf
Schematics	Circuit Diagram	circuit.pdf
ID Label/Location	Label Artwork and Location	label.pdf
User Manual	User Manual	manual.pdf
Test Report	Average Factor	af.pdf

EXHIBIT 1

GENERAL DESCRIPTION

1.0 General Description

1.1 Product Description

The equipment under test (EUT) is a transmitter for a RC robot operating at 27.145 MHz which is controlled by a crystal. The EUT is powered by a 9V battery. The EUT has an ON/OFF switch and three buttons. The three buttons are used to control the RC toy robot to move forward, turning anti-clockwise direction, generate sound effect and flash the lights.

The Model: 13404 is the same as the tested Model: 13403 in hardware and software aspect. The models are difference in packaging only.

The brief circuit description is saved with filename : descri.pdf

1.2 Related Submittal(s) Grants

The receiver for this transmitter is exempted from the Part 15 technical rules per 15.101(b).

1.3 Test Methodology

The radiated emission measurements were performed according to the procedures in ANSI C63.4 (2003). All measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section"** of this Application.

1.4 Test Facility

The open area test site and conducted measurement facility used to collect the emission data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC.

EXHIBIT 2

SYSTEM TEST CONFIGURATION

2.0 System Test Configuration

2.1 Justification

The system was configured for testing in a typical fashion (as a customer would normally use it), and in the confines as outlined in ANSI C63.4 (2003).

The EUT was powered by a new 9V battery during test.

For maximizing emissions below 30 MHz, the EUT was rotated through 360°, the centre of the loop antenna was placed 1 meter above the ground, and the antenna polarization was changed. For maximizing emission at and above 30 MHz, the EUT was rotated through 360°, the antenna height was varied from 1 meter to 4 meters above the ground plane, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data report in Exhibit 3.0.

The unit was operated standalone and placed in the center of the turntable.

The equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). The EUT was placed on a turn table, which enabled the engineer to maximize emissions through its placement in the three orthogonal axes.

For simplicity of testing, the unit was wired to transmit continuously.

2.2 EUT Exercising Software

There was no special software to exercise the device.

2.3 Special Accessories

There are no special accessories necessary for compliance of this product.

2.4 Equipment Modification

Any modifications installed previous to testing by Keenway Industries Ltd. will be incorporated in each production model sold/leased in the United States.

No modifications were installed by Intertek Testing Services.

2.5 Measurement Uncertainty

When determining the test conclusion, the measurement uncertainty of test has been considered.

2.6 Support Equipment List and Description

This product was tested in a standalone configuration.

All the items listed under section 2.0 of this report are

Confirmed by:

Ho Wai Kin, Ben
Senior Supervisor
Intertek Testing Services
Agent for Keenway Industries Ltd.

_____Signature

June 23, 2008 _____Date

EXHIBIT 3

EMISSION RESULTS

3.0 Emission Results

Data is included worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

3.1 Field Strength Calculation

The field strength is calculated by adding the reading on the Spectrum Analyzer to the factors associated with preamplifiers (if any), antennas, cables, pulse desensitization and average factors (when specified limit is in average and measurements are made with peak detectors). A sample calculation is included below.

FS = RA + AF + CF - AG + PD + AV

where FS = Field Strength in dBμV/m
RA = Receiver Amplitude (including preamplifier) in dBμV
CF = Cable Attenuation Factor in dB
AF = Antenna Factor in dB
AG = Amplifier Gain in dB
PD = Pulse Desensitization in dB
AV = Average Factor in -dB

In the radiated emission table which follows, the reading shown on the data table may reflect the preamplifier gain. An example of the calculations, where the reading does not reflect the preamplifier gain, follows:

FS = RA + AF + CF - AG + PD + AV

3.1 Field Strength Calculation (cont'd)

Example

Assume a receiver reading of 62.0 dBμV is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted. The pulse desensitization factor of the spectrum analyzer was 0 dB, and the resultant average factor was -10 dB. The net field strength for comparison to the appropriate emission limit is 32 dBμV/m. This value in dBμV/m was converted to its corresponding level in μV/m.

RA = 62.0 dBμV
AF = 7.4 dB
CF = 1.6 dB
AG = 29.0 dB
PD = 0 dB

AV = -10 dB

FS = 62 + 7.4 + 1.6 - 29 + 0 + (-10) = 32 dBμV/m

Level in μV/m = Common Antilogarithm [(32 dBμV/m)/20] = 39.8 μV/m

3.2 Radiated Emission Configuration Photograph

Worst Case Radiated Emission

54.292 MHz

For electronic filing, the worst case radiated emission configuration photograph is saved with filename: radiated photos.pdf

3.3 Radiated Emission Data

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Judgement: Passed by 6.9 dB

TEST PERSONNEL:

Signature

Terry Chan, Compliance Engineer
Typed/Printed Name

June 23, 2008
Date

Applicant: Keenway Industries Ltd. Date of Test: May 23, 2008
Model: 13403
Mode: TX
Sample: 1/1

Table 1

Radiated Emissions

Polari-zation	Frequency (MHz)	Reading (dBμV)	Pre-Amp (dB)	Antenna Factor (dB)	Average Factor (-dB)	Net at 3m (dBμV/m)	Limit at 3m (dBμV/m)	Margin (dB)
V	27.146	59.4	0	9.5	4.2	64.7	80.0	-15.3
V	54.292	38.1	16	11.0	-	33.1	40.0	-6.9
H	81.438	40.9	16	7.0	-	31.9	40.0	-8.1
H	108.584	33.7	16	14.0	-	31.7	43.5	-11.8
H	135.730	34.1	16	14.0	-	32.1	43.5	-11.4
H	162.876	31.4	16	16.0	-	31.4	43.5	-12.1
H	190.022	32.0	16	16.0	-	32.0	43.5	-11.5
H	217.168	30.6	16	17.0	-	31.6	46.0	-14.4
H	244.314	27.4	16	20.0	-	31.4	46.0	-14.6
H	271.460	25.1	16	22.0	-	31.1	46.0	-14.9
H	298.606	24.7	16	22.0	-	30.7	46.0	-15.3

Notes:
1. Peak Detector Data unless otherwise stated.
2. All measurements were made at 3 meter. Harmonic emissions not detected at the 3 meter distance were measured at 0.3 meter and an inverse proportional extrapolation was performed to compare the signal level to the 3 meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3 meter.
3. Negative value in the margin column shows emission below limit.
4. Loop antenna is used for the emissions below 30 MHz.
5. Horn antenna is used for the emissions over 1000MHz.

*Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and peak detector data with average factor for frequencies over 1000 MHz.

Test Engineer: Terry Chan

EXHIBIT 4

EQUIPMENT PHOTOGRAPHS

4.0 Equipment Photographs

For electronic filing, the photographs are saved with filename:
external photos.pdf and internal photos.pdf

EXHIBIT 5

PRODUCT LABELLING

5.0 Product Labelling

For electronic filing, the FCC ID label artwork and the label location are saved with filename: label.pdf

EXHIBIT 6

TECHNICAL SPECIFICATIONS

6.0 Technical Specifications

For electronic filing, the block diagram and schematics are saved with filename: block.pdf and circuit.pdf

EXHIBIT 7

INSTRUCTION MANUAL

7.0 Instruction Manual

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf

This manual will be provided to the end-user with each unit sold/leased in the United States.

EXHIBIT 8

MISCELLANEOUS INFORMATION

8.0 Miscellaneous Information

This miscellaneous information includes details of the measured bandwidth, the test procedure and calculation of factors such as pulse desensitization and averaging factor.

8.1 Measured Bandwidth

The plot saved in bw.pdf which shows the fundamental emission is confined in the specified band. And it also shows that the emission is at least 38 dB below the carrier level at the band edge (26.96 and 27.28 MHz). It meets the requirement of Section 15.227(b).

Figure 8.1 Bandwidth

8.2 Discussion of Pulse Desensitization

The determination of pulse desensitivity was made in accordance with Hewlett Packard Application Note 150-2, *Spectrum Analysis ... Pulsed RF.*

The effective period (T_{eff}) was approximately 480 µs for a digital "1" bit, as shown in the plots of Exhibit 8.3. With a resolution bandwidth (3 dB) of 100 kHz, the pulse desensitivity factor was 0 dB.

8.3 Calculation of Average Factor
(Worst-case : To control the RC toy robot to move forward)

Averaging factor in dB = 20 log (duty cycle)

The specification for output field strengths in accordance with the FCC rules specify measurements with an average detector. During testing, a spectrum analyzer incorporating a peak detector was used. Therefore, a reduction factor can be applied to the resultant peak signal level and compared to the limit for measurement instrumentation incorporating an average detector.

The time period over which the duty cycle is measured is 100 milliseconds, or the repetition cycle, whichever is a shorter time frame. The worst case (highest percentage on) duty cycle is used for the calculation. The duty cycle is measured by placing the spectrum analyzer in zero scan (receiver mode) and linear mode at maximum bandwidth (3 MHz at 3 dB down) and viewing the resulting time domain signal output from the analyzer on a Tektronix oscilloscope. The oscilloscope is used because of its superior time base and triggering facilities.

A plot of the worst-case duty cycle as detected in this manner are saved with filename: af.pdf

The duty cycle is simply the on-time divided by the period:

The duration of one cycle = 17.12 ms
Effective period of the cycle = 4 x 1.44 ms + 10 x 480 µs
= 10.56 ms

DC = 10.56 ms / 17.12 ms = 0.61682 or 61.682%

Therefore, the averaging factor is found by 20 $\log_{10}$ 0.61682 = -4.2 dB

8.4 Emissions Test Procedures

The following is a description of the test procedure used by Intertek Testing Services in the measurements of transmitters operating under Part 15, Subpart C rules.

The test set-up and procedures described below are designed to meet the requirements of ANSI C63.4 - 2003.

The transmitting equipment under test (EUT) is placed on a wooden turntable which is four feet in diameter and approximately one meter in height above the ground plane. During the radiated emissions test, the turntable is rotated and any cables leaving the EUT are manipulated to find the configuration resulting in maximum emissions. The EUT is adjusted through all three orthogonal axes to obtain maximum emission levels. The antenna height and polarization are varied during the testing to search for maximum signal levels.

Detector function for radiated emissions is in peak mode. Average readings, when required, are taken by measuring the duty cycle of the equipment under test and subtracting the corresponding amount in dB from the measured peak readings. A detailed description for the calculation of the average factor can be found in Exhibit 8.3.

The frequency range scanned is from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or 40 GHz, whichever is lower. For line conducted emissions, the range scanned is 150 kHz to 30 MHz.

8.4 Emissions Test Procedures (cont'd)

The EUT is warmed up for 15 minutes prior to the test.

AC power to the unit is varied from 85% to 115% nominal and variation in the fundamental emission field strength is recorded. If battery powered, a new, fully charged battery is used.

Conducted measurements are made as described in ANSI C63.4 - 2003.

The IF bandwidth used for measurement of radiated signal strength was 10 kHz for emission below 30 MHz and 120 kHz for emission from 30 MHz to 1000 MHz. Where pulsed transmissions of short enough pulse duration warrant, a greater bandwidth is selected according to the recommendations of Hewlett Packard Application Note 150-2. A discussion of whether pulse desensitivity is applicable to this unit is included in this report (See Exhibit 8.2). Above 1000 MHz, a resolution bandwidth of 1 MHz is used.

Transmitter measurements are normally conducted at a measurement distance of three meters. However, to assure low enough noise floor in the restricted bands and above 1 GHz, signals are acquired at a distance of one meter or less. All measurements are extrapolated to three meters using inverse scaling, but those measurements taken at a closer distance are so marked.