



- 1.) Kindly discuss how this device was tested and found to comply with the limits with the limits for devices with a periodic rate of less than 20Hz. Please see 15.35(a), especially the "Note:" which applies to this rule section.

The basic idea is this:

Whenever you are looking at a pulsed transmission with a periodic rate slower than 20 pulses per second (20Hz), then the Rules exclude the use of quasi-peak measurement. Since this device transmits with a period about once per second, then no quasi peak will apply. Peak measurements using a 120KHz CISPIR bandwidth filter should be used for this measurement.

Since Quasi-Peak does not apply, a method for determining "Average" value is needed for comparison to the limits. This is done in the time domain by comparing the pulse width to 100msec. For this case with a 240msec pulse width there is no de-rating possible so both Peak and Average values should be the same. In your first test report you show a difference between peak and average of about 14dB. This is clearly impossible and incorrect. Perhaps you were incorrectly employing the 10Hz VBW method for making an "average" measurement - this technique only applies when looking at emissions above 1GHz. The newer revised test report uses quasi-peak measurements - again clearly incorrect because the pulse repetition rate is so long (more than 20Hz).

[The second revised report downloaded to web site.](#)