

## FCC PART 15.247

## TEST REPORT

For

### RTX Hong Kong Ltd.

8/F Corporation Square, 8 Lam Lok Street, Kowloon Bay, Kowloon, Hong Kong

**FCC ID: T7HCT821X**

<b>Report Type:</b> Original Report	<b>Product Type:</b> RTX8210/RTX8212
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The information marked # is provided by the applicant, the laboratory is not responsible for its authenticity.

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## GENERAL INFORMATION

### Product Description for Equipment under Test (EUT)

Product	RTX8210/RTX8212
Tested Model	RTX8212
Multiple Model <sup>#</sup>	RTX8210
Frequency Range	2402~2480MHz
Transmit Power	-0.41dBm
Modulation Technique	GFSK
Antenna Specification	-4dBi
Voltage Range	DC 3.0 V battery
Date of Test	2019-05-22~2019-05-28
Sample serial number	190409007
Received date	2019-04-09
Sample/EUT Status	Good condition

*Notes: This series products model: RTX8210 and RTX8212 are identical; they have the same or similar appearance, structure, PCB, Material and function to the testing products, Model RTX8212 was selected for fully testing, the detailed information can be referred to the attached declaration which was stated and guaranteed by the applicant.*

### Objective

This report is prepared on behalf of *RTX Hong Kong Ltd.* in accordance with Part 2-Subpart J, Part 15-Subparts A and C of the Federal Communication Commission's rules.

The tests were performed in order to determine compliance with FCC Part 15, Subpart C, and section 15.203, 15.205, 15.209 and 15.247 rules.

### Related Submittal(s)/Grant(s)

No Related Submittal(s)/Grant(s).

### Test Methodology

All measurements contained in this report were conducted with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices. And KDB 558074 D01 15.247 Meas Guidance v05r02.

All emissions measurement was performed at Bay Area Compliance Laboratories Corp. (Shenzhen). The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

**Measurement Uncertainty**

Parameter		Uncertainty
Occupied Channel Bandwidth		±5%
RF Output Power with Power meter		±0.73dB
RF conducted test with spectrum		±1.6dB
AC Power Lines Conducted Emissions		±1.95dB
Emissions, Radiated	Below 1GHz	±4.75dB
	Above 1GHz	±4.88dB
Temperature		±1 °C
Humidity		±6%
Supply voltages		±0.4%

*Note: Otherwise required by the applicant or Product Regulations, Decision Rule in this report did not consider the uncertainty.*

**Test Facility**

The test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect test data is located on the 6/F., West Wing, Third Phase of Wanli Industrial Building, Shihua Road, Futian Free Trade Zone, Shenzhen, Guangdong, China.

The test site has been approved by the FCC under the KDB 974614 D01 and is listed in the FCC Public Access Link (PAL) database, FCC Registration No.: 342867, the FCC Designation No.: CN1221.

The test site has been registered with ISED Canada under ISED Canada Registration Number 3062B.

## SYSTEM TEST CONFIGURATION

### Description of Test Configuration

For BLE mode, 40 channels are provided to testing:

Channel	Frequency (MHz)	Channel	Frequency (MHz)
0	2402	20	2442
1	2404	21	2444
2	2406	22	2446
3	2408	23	2448
4	2410	24	2450
5	2412	25	2452
6	2414	26	2454
7	2416	27	2456
8	2418	28	2458
9	2420	29	2460
10	2422	30	2462
11	2424	31	2464
12	2426	32	2466
13	2428	33	2468
14	2430	34	2470
15	2432	35	2472
16	2434	36	2474
17	2436	37	2476
18	2438	38	2478
19	2440	39	2480

EUT was tested with Channel 0, 19 and 39.

### Equipment Modifications

No modification was made to the EUT tested.

### EUT Exercise Software

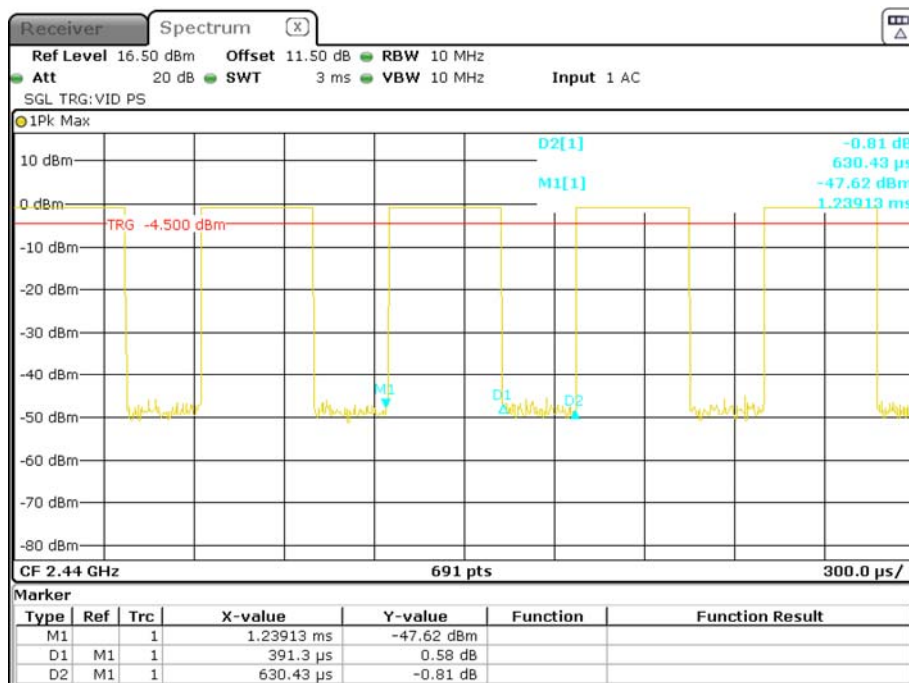
BLE test in the engineer mode.

The device was tested with the worst case was performed as below:

Mode	Data rate	Power level		
		Low channel	Middle channel	High channel
BLE	/	Default	Default	Default

# Duty cycle

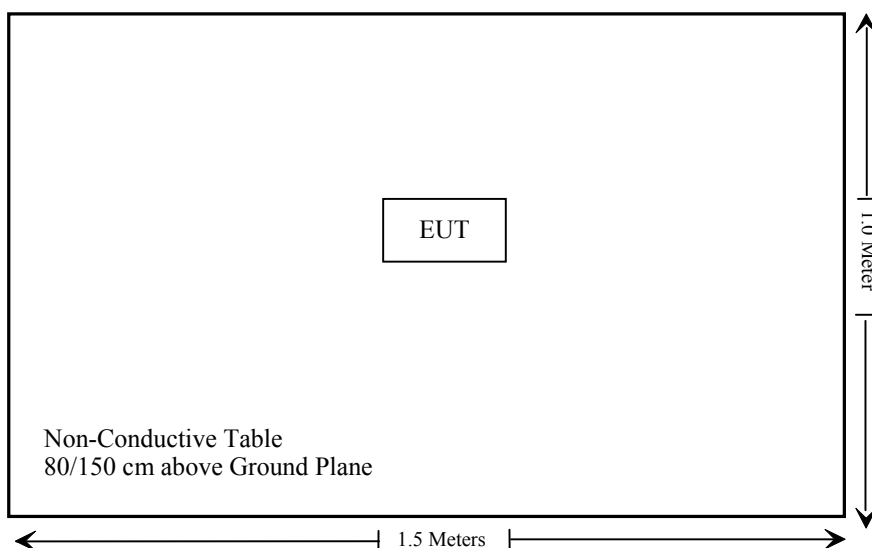
## BLE Mode



Date: 23.MAY.2019 19:11:51

Mode	Duty Cycle (%)	T (us)	1/T (kHz)	VBW Setting (kHz)	10log(1/ Duty Cycle)
BLE	62.1	391.3	2.56	3	2.07

## Block Diagram of Test Setup



**SUMMARY OF TEST RESULTS**

FCC Rules	Description of Test	Result
§15.247 (i), §1.1307 (b) (1)& §2.1093	RF Exposure	Compliance
§15.203	Antenna Requirement	Compliance
§15.207 (a)	AC Line Conducted Emissions	Not Applicable
§15.205, §15.209, §15.247(d)	Spurious Emissions	Compliance
§15.247 (a)(2)	6 dB Emission Bandwidth	Compliance
§15.247(b)(3)	Maximum Conducted Output Power	Compliance
§15.247(d)	100 kHz Bandwidth of Frequency Band Edge	Compliance
§15.247(e)	Power Spectral Density	Compliance

Not Applicable: The EUT is powered by battery only.

**TEST EQUIPMENT LIST**

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
<b>Radiated Emission Test</b>					
A.H. System	Horn Antenna	SAS-200/571	135	2018-09-01	2021-08-31
Rohde & Schwarz	Signal Analyzer	FSEM	845987/005	2018-06-23	2019-06-23
Sunol Sciences	Broadband Antenna	JB1	A040904-1	2017-12-22	2020-12-21
COM-POWER	Pre-amplifier	PA-122	181919	2018-11-12	2019-11-12
Sonoma Instrument	Amplifier	310N	186238	2018-11-12	2019-11-12
Rohde & Schwarz	EMI Test Receiver	ESR	1316.3003K03-101746-zn	2018-07-11	2019-07-11
Ducommun technologies	RF Cable	UFA147A-2362-100100	MFR64639231029-003	2018-11-12	2019-11-12
Ducommun technologies	RF Cable	104PEA	218124002	2018-11-12	2019-11-12
Ducommun technologies	RF Cable	RG-214	1	2019-05-21	2019-11-19
Ducommun technologies	RF Cable	RG-214	2	2018-11-12	2019-11-12
Ducommun Technologies	Horn Antenna	ARH-4223-02	1007726-04	2017-12-29	2020-12-28
Heatsink Required	Amplifier	QLW-18405536-J0	15964001002	2018-11-12	2019-11-12
Sinoscite	Notch Filter	BSF2402-2480MN-0898-001	99632	2018-11-12	2019-11-12
Rohde & Schwarz	Auto test software	EMC 32	V9.10	NCR	NCR
<b>RF Conducted Test</b>					
Agilent	USB windebond power meter	U2021XA	MY54250003	2018-06-23	2019-06-23
WEINSCHL	10dB Attenuator	5324	AU 3842	Each Time	
Rohde Schwarz	EMI Test Receiver	ESR	1316.3003K03-101746-zn	2018-07-11	2019-07-11
Ducommun technologies	RF Cable	RG-214	3	Each Time	

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to requirements that traceable to National Primary Standards and International System of Units (SI).



**FCC§15.247 (i), §1.1307 (b) (1) & §2.1093 – RF EXPOSURE****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  $\leq 50$  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  $\leq 7.5$  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.

**Measurement Result**

Mode	Frequency (MHz)	Max Tune-up Conducted Power (dBm)	Max Tune-up Conducted Power (mW)	Calculated Distance (mm)	Calculated value	Threshold (1-g SAR)	SAR Test Exclusion
BLE	2480	0	1	5	0.31	3.0	Yes

The maximum tune up conducted power was declared by the applicant.

**Result: No SAR test is required.**

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## **FCC §15.203 - ANTENNA REQUIREMENT**

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### **Applicable Standard**

According to § 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 user of a standard antenna jack or electrical connector is prohibited. The structure and application of the EUT were analyzed to determine compliance with section §15.203 of the rules. §15.203 state that the subject device must meet the following criteria:

- a. Antenna must be permanently attached to the unit.
  - b. Antenna must use a unique type of connector to attach to the EUT.
- Unit must be professionally installed, and installer shall be responsible for verifying that the correct antenna is employed with the unit.

And according to FCC 47 CFR section 15.247 (b), if the transmitting antennas of directional gain greater than 6dBi are used, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

### **Antenna Connector Construction**

The EUT has a PCB antenna arrangement, which was permanently attached and the antenna gain is -4 dBi, fulfill the requirement of this section. Please refer to the EUT photos.

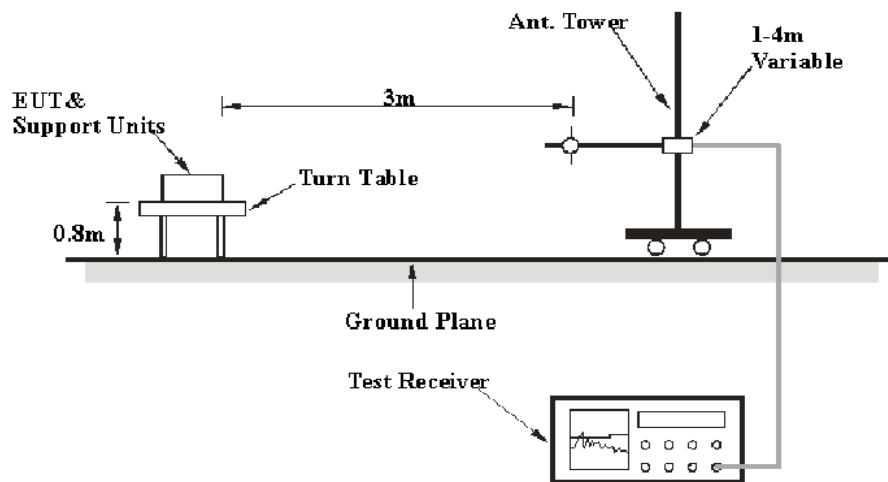
**Result:** Compliance.

**FCC §15.209, §15.205 & §15.247(d) - SPURIOUS EMISSIONS****Applicable Standard**

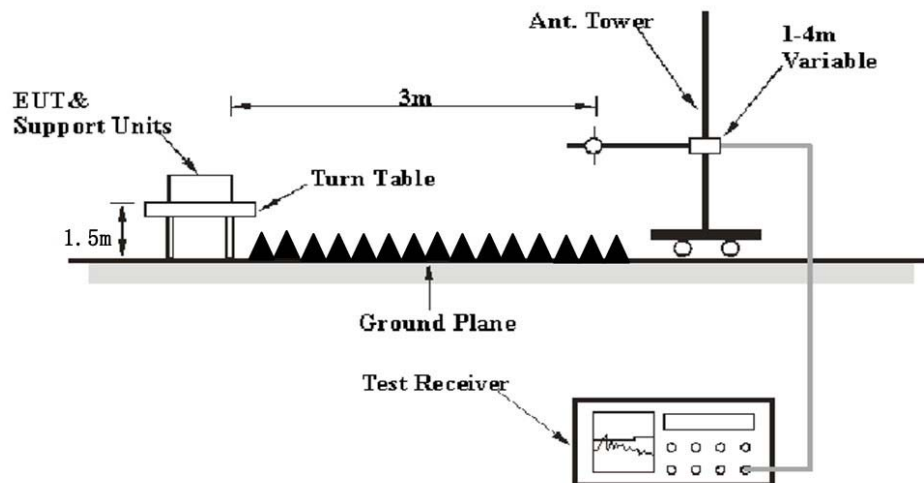
FCC §15.247 (d); §15.209; §15.205;

**EUT Setup**

**Below 1 GHz:**



**Above 1GHz:**



The radiated emission tests were performed in the 3 meters test site, using the setup accordance with the ANSI C63.10-2013. The specification used was the FCC 15.209, and FCC 15.247 limits.

## EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 25 GHz.

During the radiated emission test, the EMI test receiver & Spectrum Analyzer Setup were set with the following configurations:

Frequency Range	RBW	Video B/W	IF B/W	Measurement
30 MHz – 1000 MHz	100 kHz	300 kHz	120 kHz	QP
Above 1 GHz	1MHz	3 MHz	/	PK
	1MHz	10 Hz <sup>Note 1</sup>	/	Average
	1MHz	> 1/T <sup>Note 2</sup>	/	Average

Note 1: when duty cycle is no less than 98%

Note 2: when duty cycle is less than 98%

## Test Procedure

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

Data was recorded in Quasi-peak detection mode for frequency range of 30 MHz-1 GHz, peak and Average detection modes for frequencies above 1 GHz.

## Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain from the Meter Reading. The basic equation is as follows:

$$\text{Corrected Amplitude} = \text{Meter Reading} + \text{Antenna Factor} + \text{Cable Loss} - \text{Amplifier Gain}$$

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

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

## Test Results Summary

According to the recorded data in following table, the EUT complied with the FCC Title 47, Part 15, Subpart C, section 15.205, 15.209 and 15.247.

Refer to CISPR16-4-2:2011 and CISPR 16-4-1:2009, the measured level complies with the limit if

$$L_m + U_{(Lm)} \leq L_{lim} + U_{cispr}$$

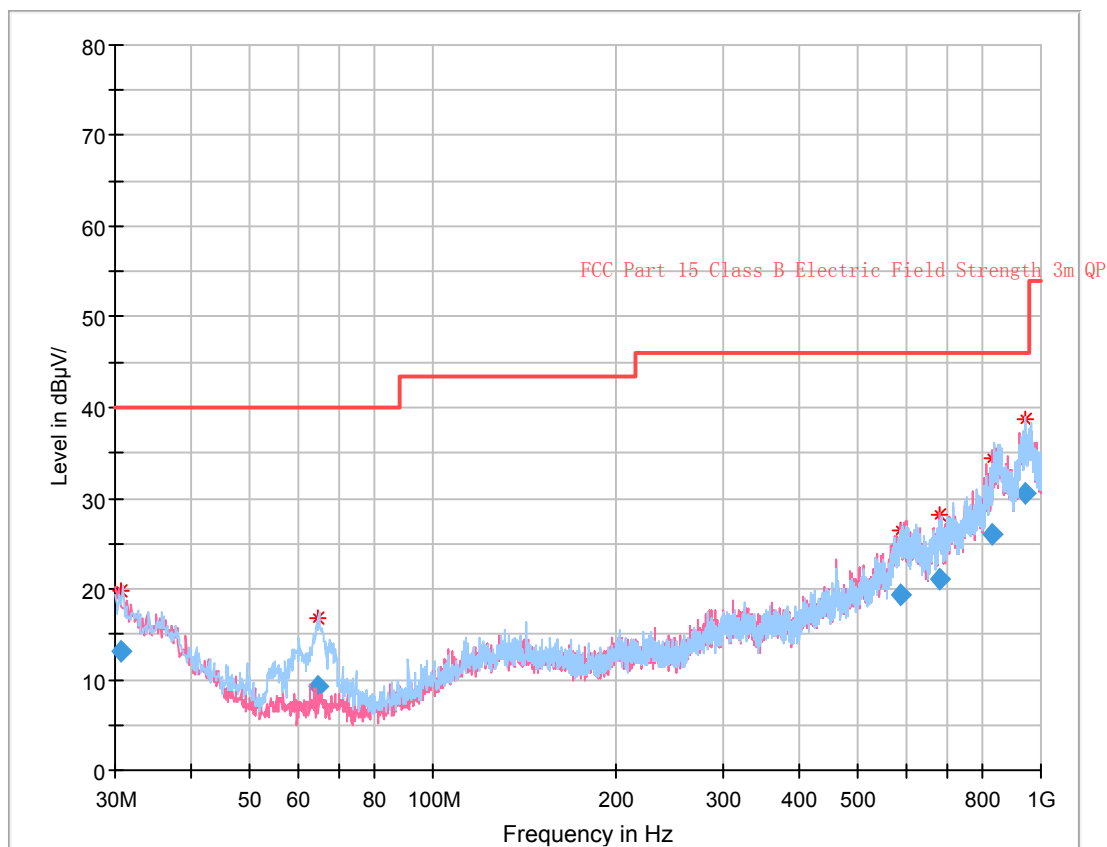
In BACL,  $U_{(Lm)}$  is less than  $U_{cispr}$ , if  $L_m$  is less than  $L_{lim}$ , it implies that the EUT complies with the limit.

**Test Data****Environmental Conditions**

<b>Temperature:</b>	25 °C
<b>Relative Humidity:</b>	52 %
<b>ATM Pressure:</b>	101.0 kPa

*The testing was performed by Curry Xiang and Andy Yu from 2019-05-23 to 2019-05-28.*

*EUT operation mode: Transmitting*

**30 MHz~1 GHz:**

Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna height (cm)	Antenna Polarity	Turntable position (degree)	Correction Factor (dB/m)	Limit (dBμV/m)	Margin (dB)
30.605750	13.09	362.0	H	193.0	-8.0	40.00	26.91
64.870500	9.22	315.0	H	331.0	-20.4	40.00	30.78
589.232375	19.39	160.0	V	182.0	-2.4	46.00	26.61
682.577375	20.97	220.0	V	134.0	-2.0	46.00	25.03
831.374875	26.00	220.0	V	351.0	5.1	46.00	20.00
940.730125	30.62	222.0	H	16.0	8.9	46.00	15.38

**1 GHz-25 GHz:**

Frequency (MHz)	Receiver		Turntable Degree	Rx Antenna		Corrected Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)
	Reading (dBμV)	PK/QP/Ave.		Height (m)	Polar (H/V)				
Low Channel (2402 MHz)									
2354.40	28.56	PK	312	1.8	H	31.77	60.33	74	13.67
2354.40	15.53	Ave.	312	1.8	H	31.77	47.30	54	6.70
2486.70	28.29	PK	170	2.0	H	32.13	60.42	74	13.58
2486.70	14.96	Ave.	170	2.0	H	32.13	47.09	54	6.91
4804.00	44.18	PK	13	2.5	H	6.28	50.46	74	23.54
4804.00	34.22	Ave.	13	2.5	H	6.28	40.50	54	13.50
Middle Channel (2440 MHz)									
4880.00	44.23	PK	45	2.4	H	6.76	50.99	74	23.01
4880.00	34.39	Ave.	45	2.4	H	6.76	41.15	54	12.85
High Channel (2480 MHz)									
2381.11	28.40	PK	193	2.5	H	31.87	60.27	74	13.73
2381.11	15.32	Ave.	193	2.5	H	31.87	47.19	54	6.81
2483.68	33.43	PK	58	1.7	H	32.13	65.56	74	8.44
2483.68	15.49	Ave.	58	1.7	H	32.13	47.62	54	6.38
4960.00	44.68	PK	18	1.5	H	6.80	51.48	74	22.52
4960.00	35.34	Ave.	18	1.5	H	6.80	42.14	54	11.86

**Note:**

Corrected Factor = Antenna factor (RX) + Cable Loss – Amplifier Factor

Corrected Amplitude = Corrected Factor + Reading

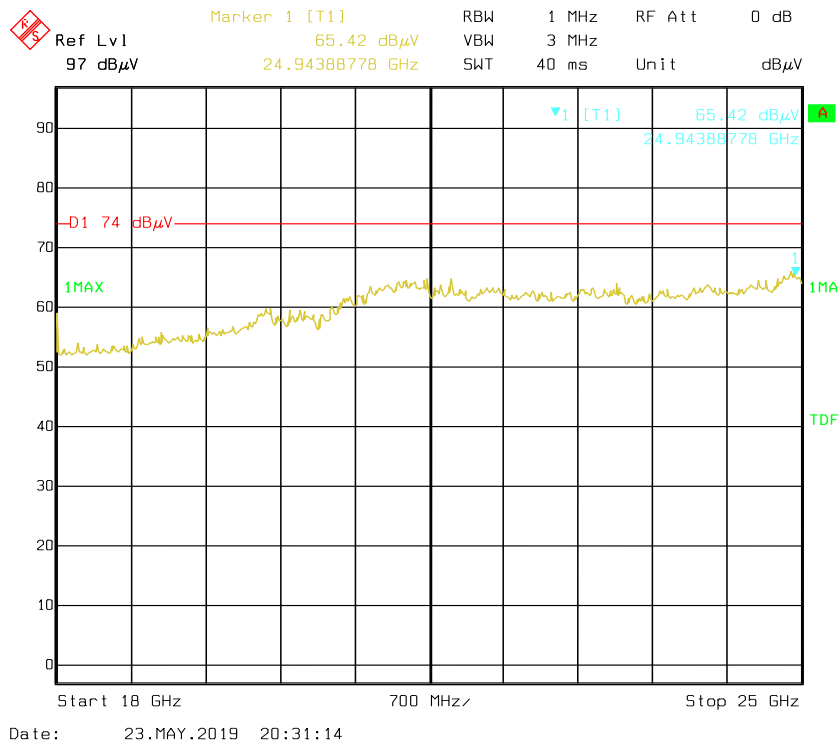
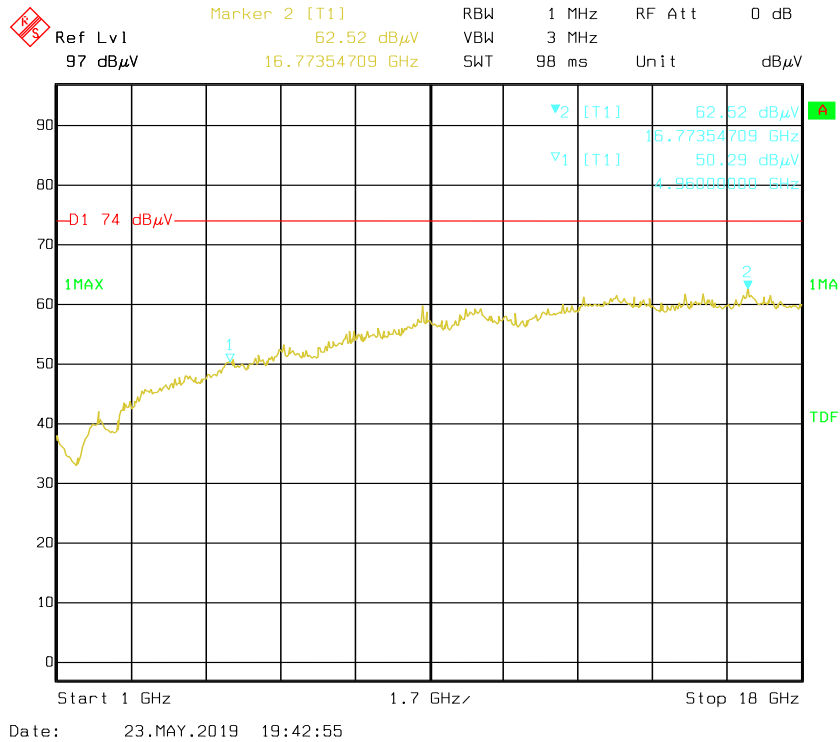
Margin = Limit - Corrected. Amplitude

The other spurious emission which is 20dB to the limit was not recorded.

And for the pre-scan is performed with the 2400-2483.5MHz band filter.

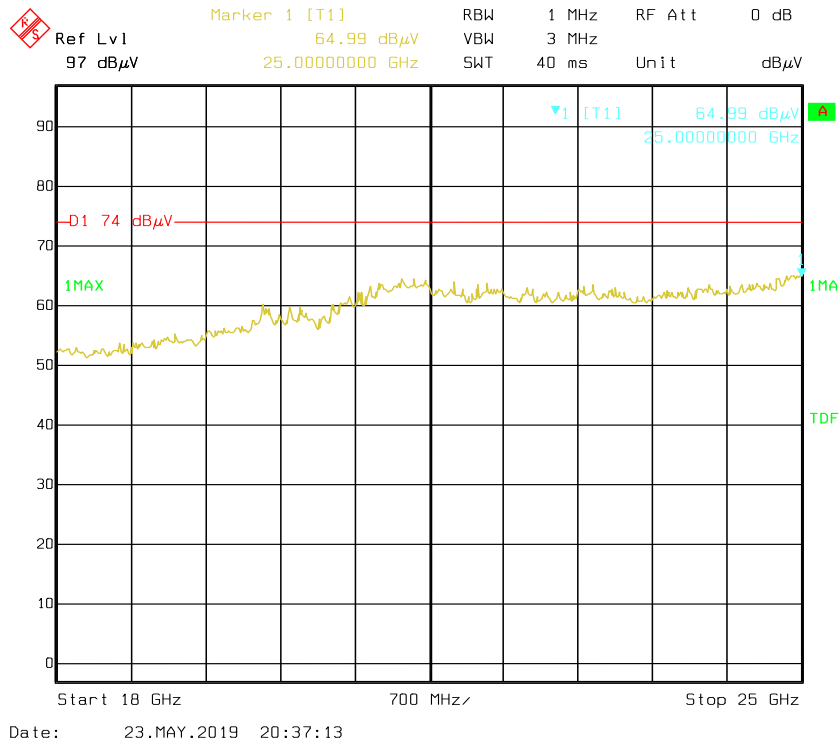
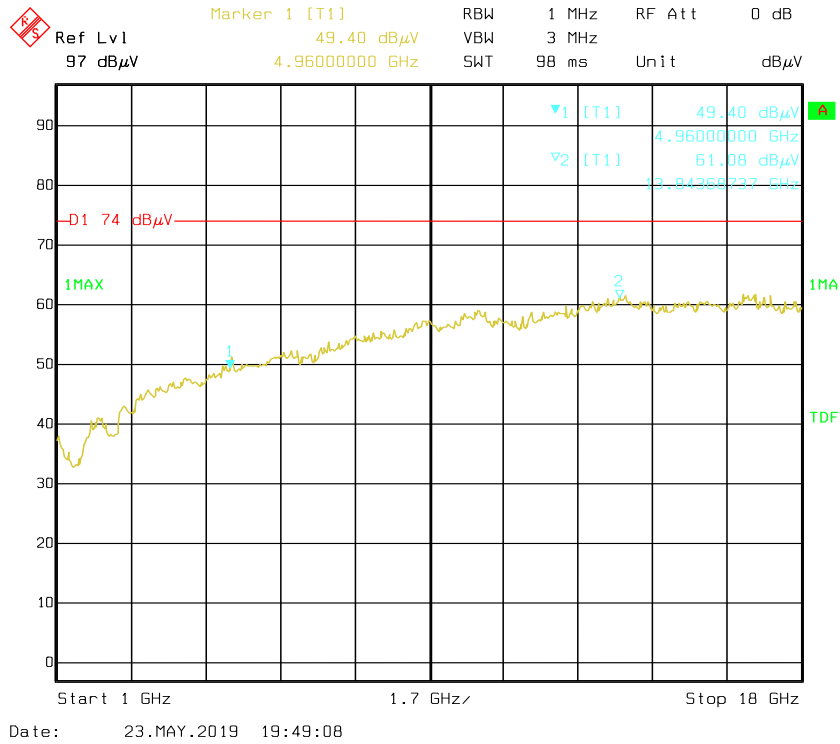
High channel (Worst case):

Horizontal

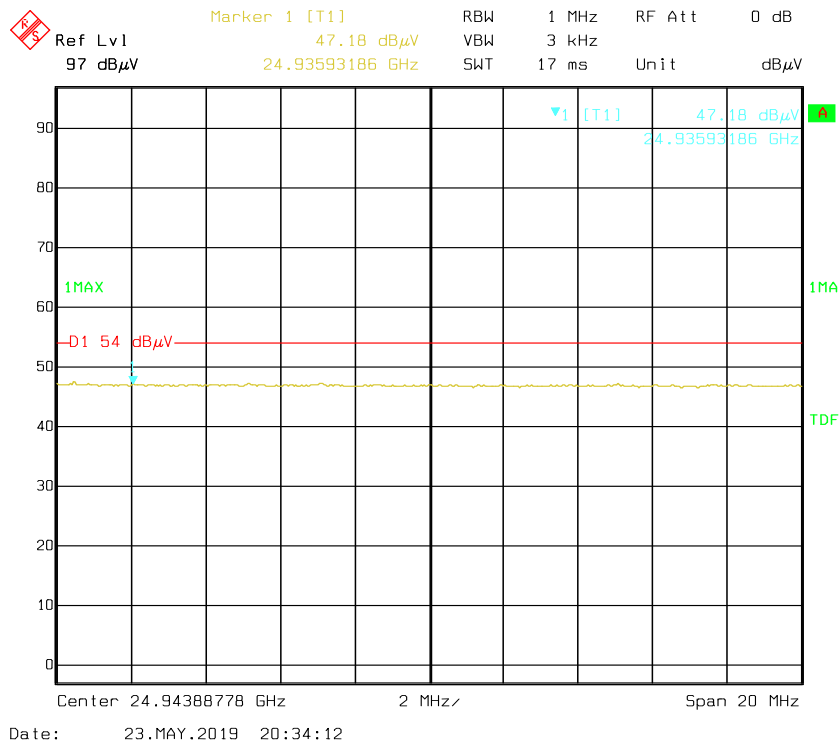
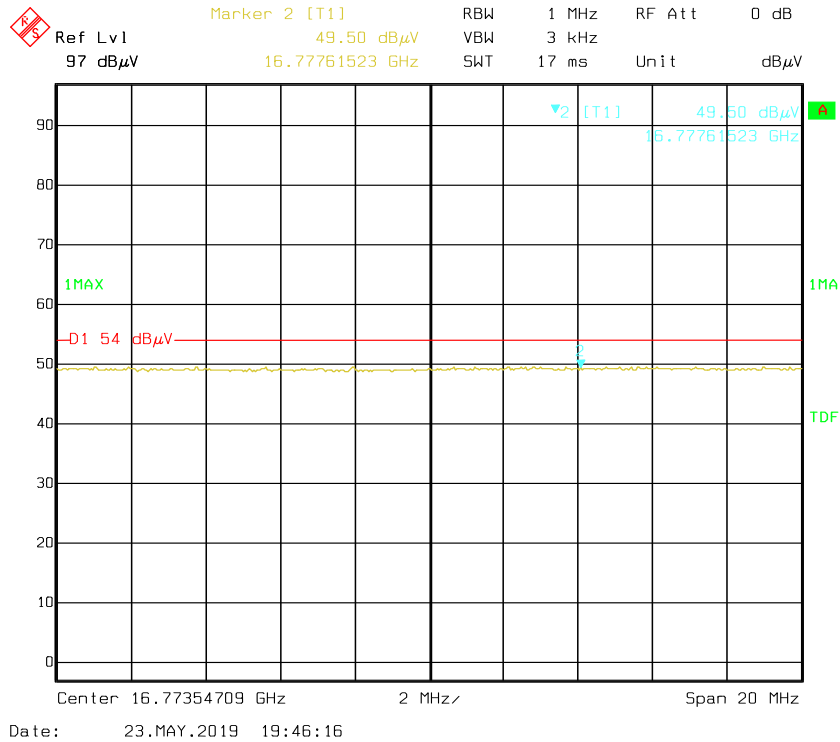




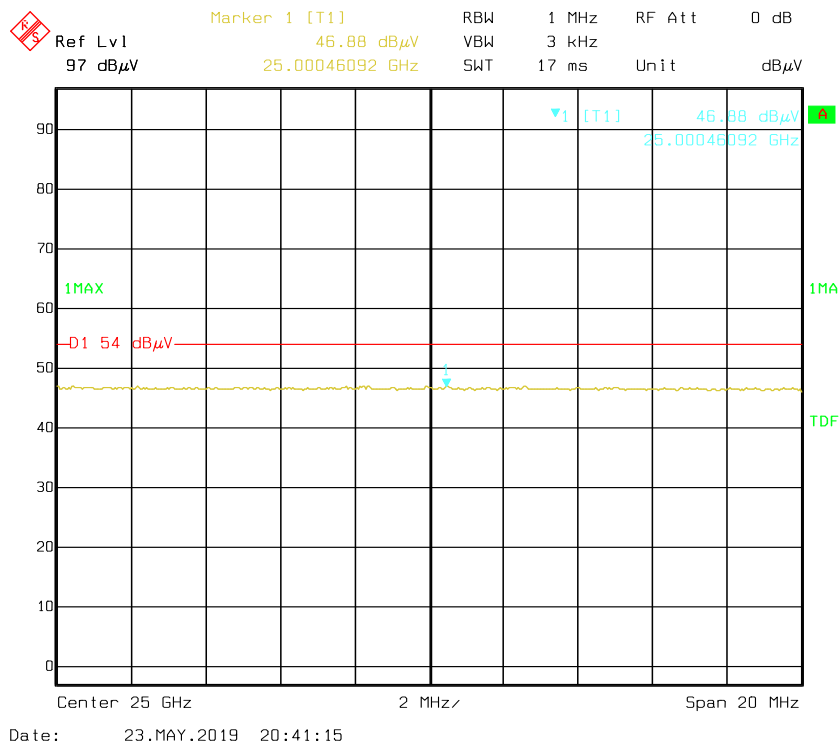
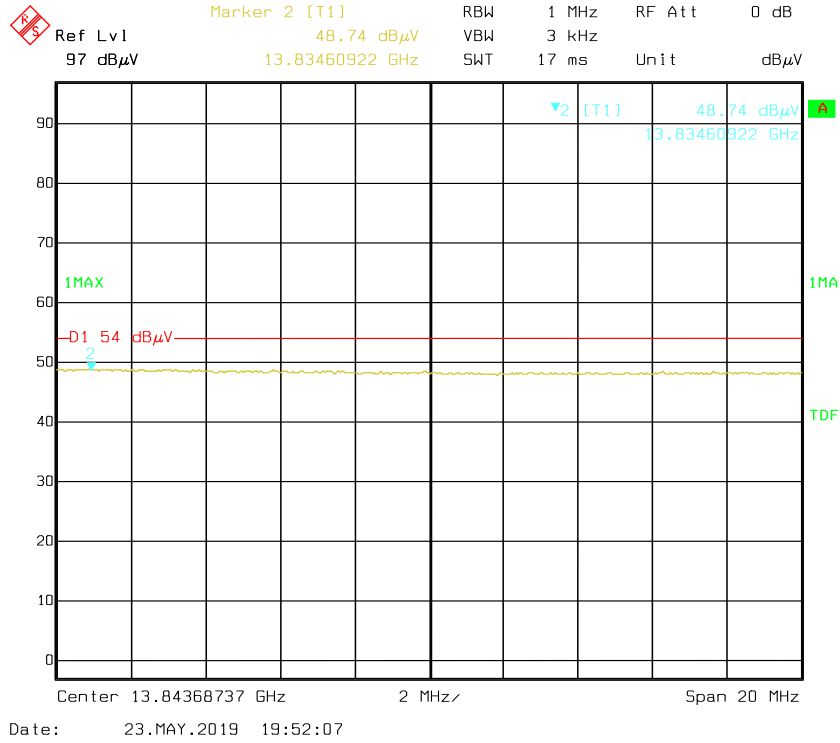
### Vertical



### Pre-scan for Average Horizontal



### Vertical



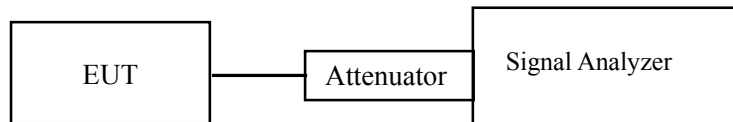
## FCC §15.247(a) (2) – 6 dB EMISSION BANDWIDTH

### Applicable Standard

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.

### Test Procedure

1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect it to measurement instrument. Then set it to any one convenient frequency within its operating range. Set a reference level on the measuring instrument equal to the highest peak value.
3. Measure the frequency difference of two frequencies that were attenuated 6 dB from the reference level. Record the frequency difference as the emission bandwidth.
4. Repeat above procedures until all frequencies measured were complete.



### Test Data

#### Environmental Conditions

<b>Temperature:</b>	25 °C
<b>Relative Humidity:</b>	52 %
<b>ATM Pressure:</b>	101.0 kPa

*The testing was performed by Kieroy Luo on 2019-05-23.*

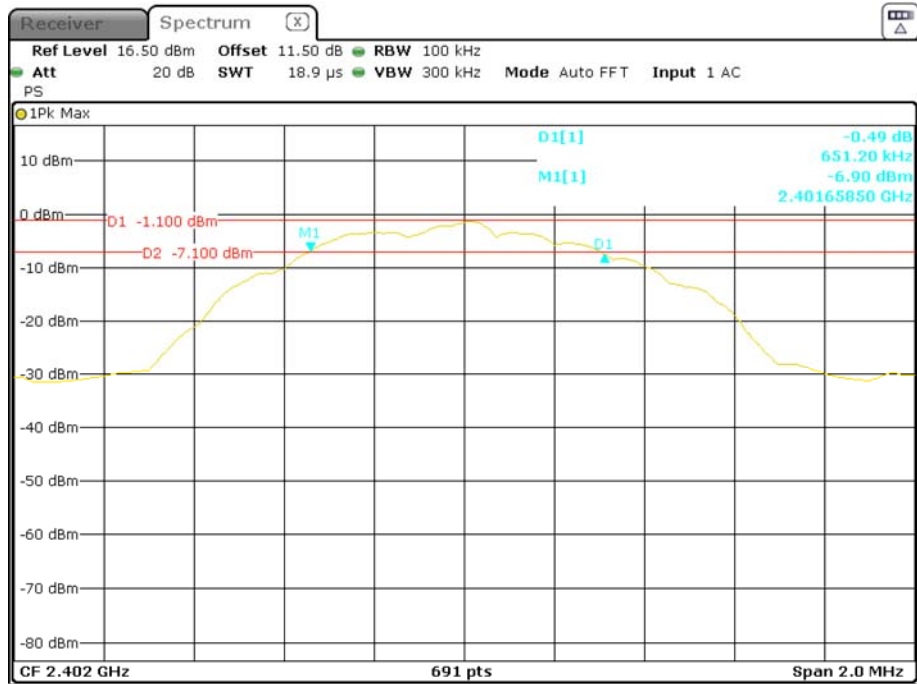
**Test Result:** Pass.

Please refer to the following table and plots.

*EUT operation mode: Transmitting*

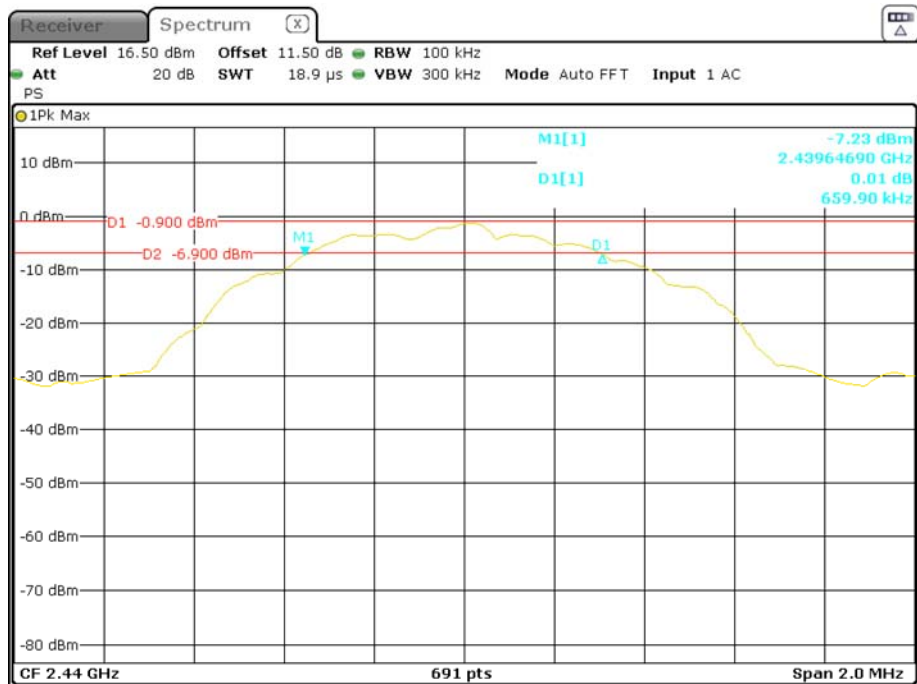
Channel	Frequency (MHz)	6 dB Emission Bandwidth (MHz)	Limit (kHz)
BLE mode			
Low	2402	0.651	≥500
Middle	2440	0.660	≥500
High	2480	0.666	≥500

### BLE Low Channel



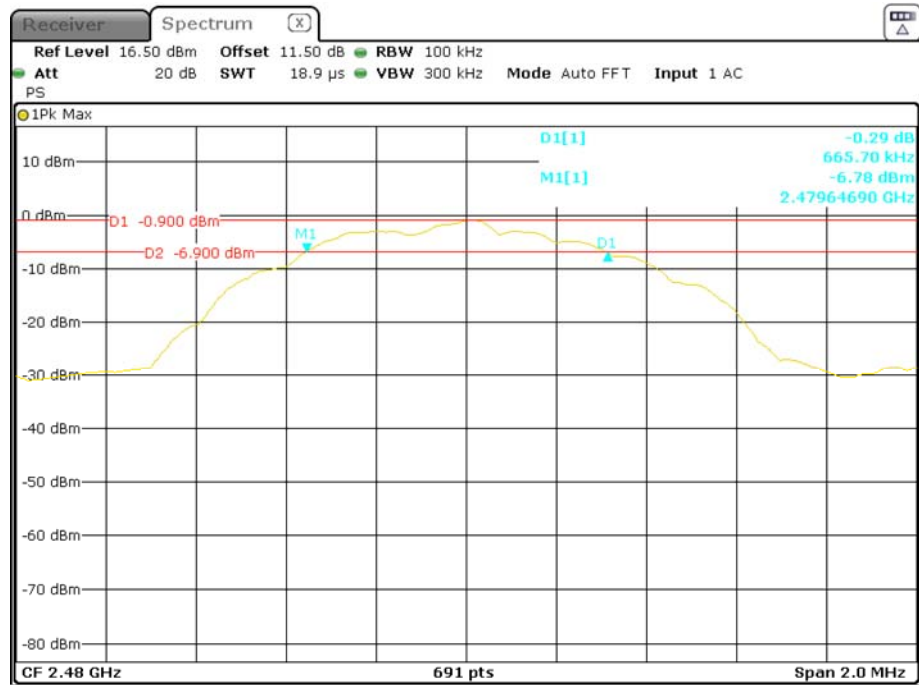
Date: 23.MAY.2019 19:03:40

### BLE Middle Channel



Date: 23.MAY.2019 19:01:43

## BLE High Channel



Date: 23.MAY.2019 19:00:53

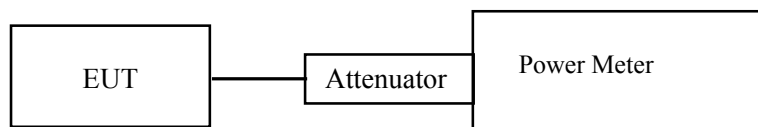
## FCC §15.247(b) (3) - MAXIMUM CONDUCTED OUTPUT POWER

### Applicable Standard

According to FCC §15.247(b) (3), for systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

### Test Procedure

1. Place the EUT on a bench and set it in transmitting mode.
2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to one test equipment.
3. Add a correction factor to the display.



### Test Data

#### Environmental Conditions

<b>Temperature:</b>	25 °C
<b>Relative Humidity:</b>	52 %
<b>ATM Pressure:</b>	101.0 kPa

*The testing was performed by Kieroy Luo on 2019-05-23.*

*EUT operation mode: Transmitting*

#### BLE mode

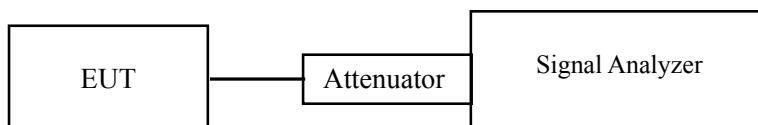
Channel	Frequency (MHz)	Max Peak Output Power (dBm)	Limit (dBm)	Result
Low	2402	-0.86	30	Pass
Middle	2440	-0.64	30	Pass
High	2480	-0.41	30	Pass

**FCC §15.247(d) – 100 kHz BANDWIDTH OF FREQUENCY BAND EDGE****Applicable Standard**

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)).

**Test Procedure**

1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect its antenna terminal to measurement instrument via a low loss cable. Then set it to any one measured frequency within its operating range, and make sure the instrument is operated in its linear range.
3. Set RBW to 100 kHz and VBW of spectrum analyzer to 300 kHz with a convenient frequency span including 100 kHz bandwidth from band edge.
4. Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.
5. Repeat above procedures until all measured frequencies were complete.

**Test Data****Environmental Conditions**

<b>Temperature:</b>	25 °C
<b>Relative Humidity:</b>	52 %
<b>ATM Pressure:</b>	101.0 kPa

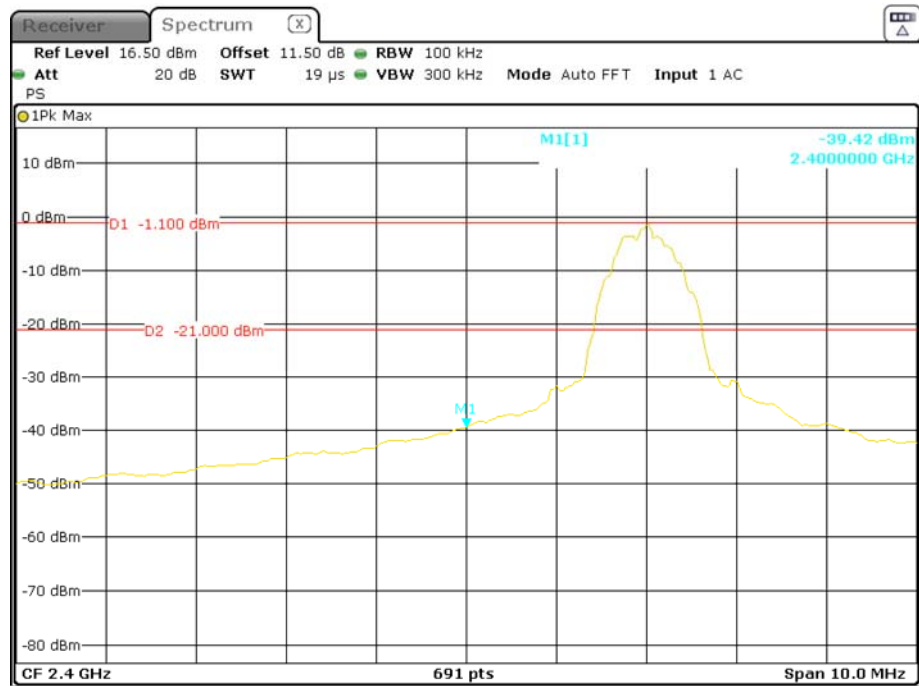
*The testing was performed by Kieroy Luo on 2019-05-23.*

*EUT operation mode: Transmitting*

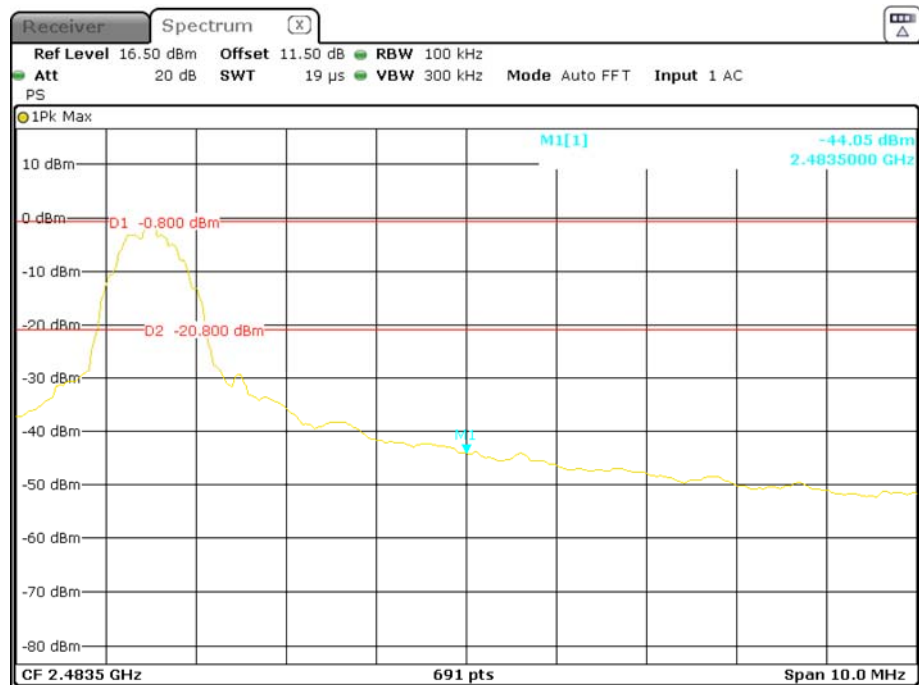
**Test Result:** Compliance

Please refer to the following plots.



**BLE: Band Edge, Left Side**

Date: 23.MAY.2019 19:04:50

**BLE: Band Edge, Right Side**

Date: 23.MAY.2019 19:06:10

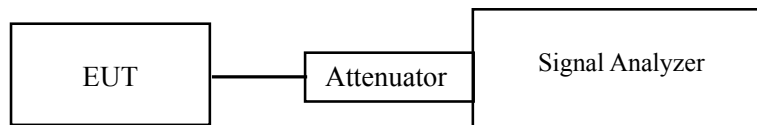
## FCC §15.247(e) - POWER SPECTRAL DENSITY

### Applicable Standard

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. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

### Test Procedure

1. Use this procedure when the maximum peak conducted output power in the fundamental emission is used to demonstrate compliance.
2. Set the RBW to:  $3\text{ kHz} \leq \text{RBW} \leq 100\text{ kHz}$ .
3. Set the VBW  $\geq 3 \times \text{RBW}$ .
4. Set the span to 1.5 times the DTS bandwidth.
5. Detector = peak.
6. Sweep time = auto couple.
7. Trace mode = max hold.
8. Allow trace to fully stabilize.
9. Use the peak marker function to determine the maximum amplitude level within the RBW.
10. If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.



### Test Data

#### Environmental Conditions

<b>Temperature:</b>	25 °C
<b>Relative Humidity:</b>	52 %
<b>ATM Pressure:</b>	101.0 kPa

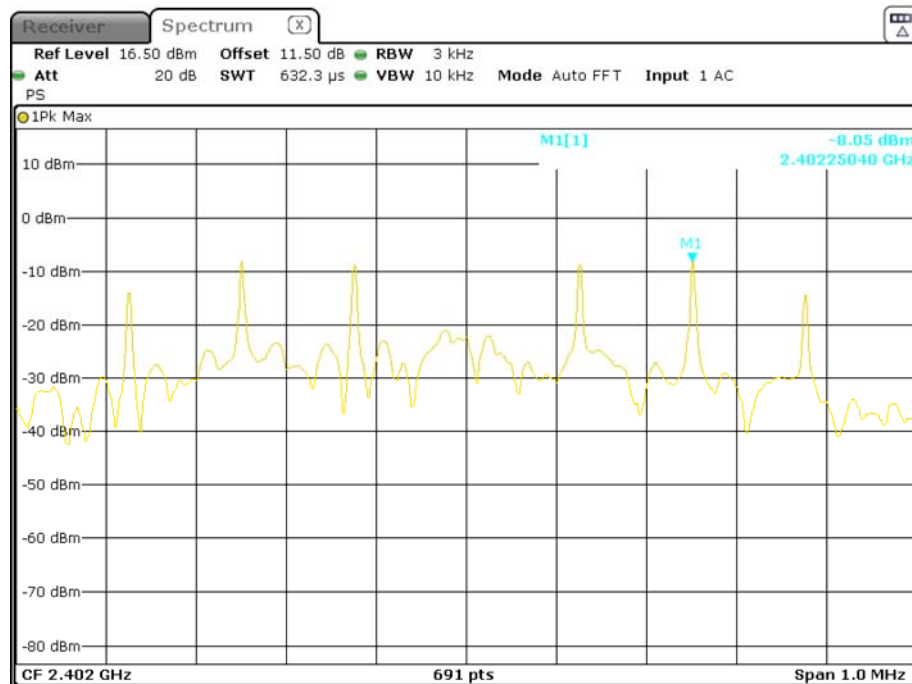
*The testing was performed by Kieroy Luo on 2019-05-23.*

*EUT operation mode: Transmitting*

**Test Result:** Pass

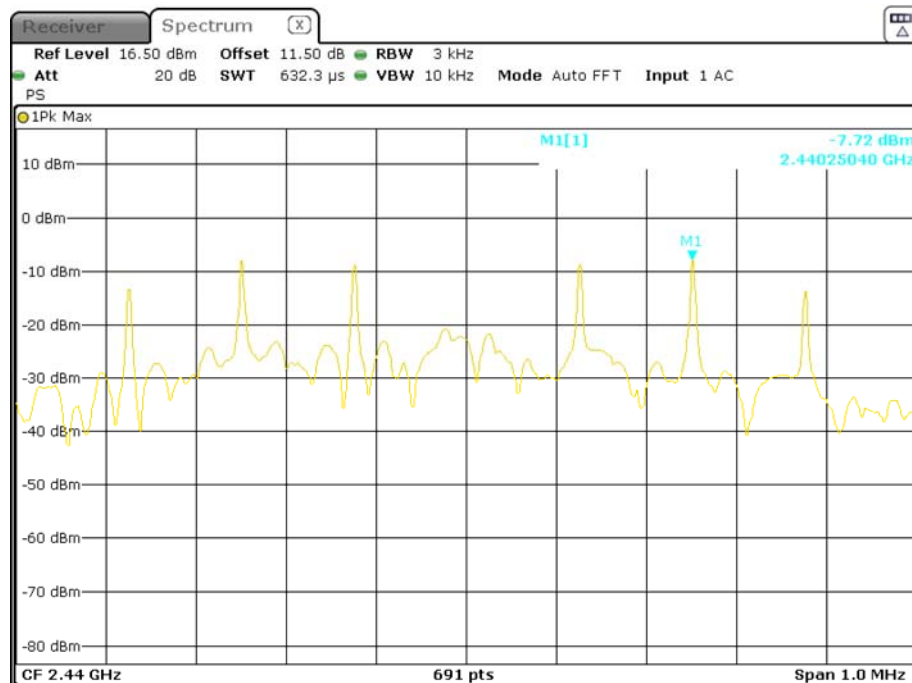
Channel	Frequency (MHz)	PSD (dBm/3kHz)	Limit (dBm/3kHz)
BLE mode			
Low	2402	-8.05	$\leq 8$
Middle	2440	-7.72	$\leq 8$
High	2480	-7.49	$\leq 8$

### Power Spectral Density, BLE Low Channel



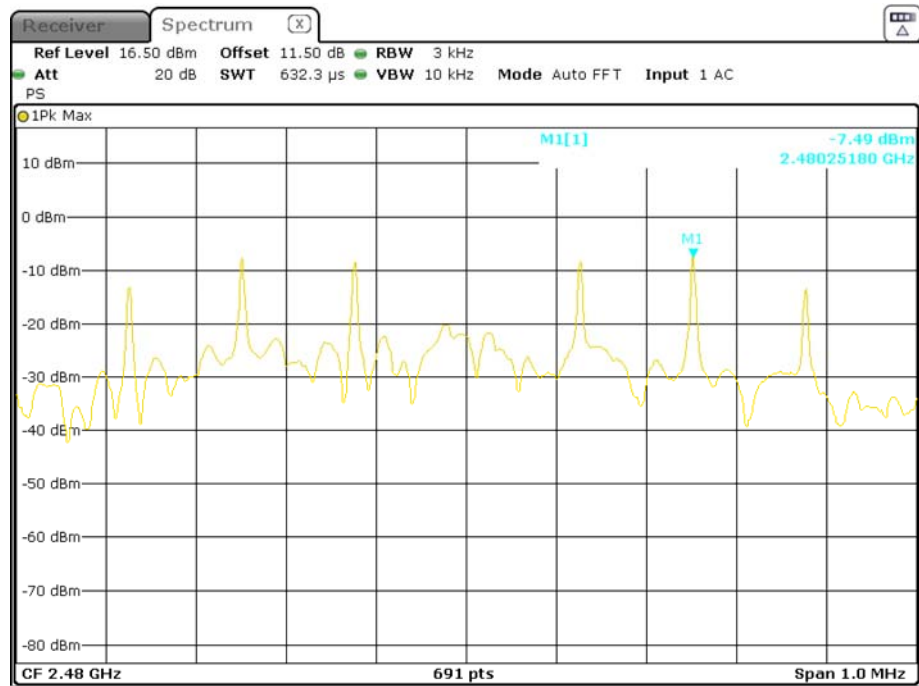
Date: 23.MAY.2019 19:09:33

### Power Spectral Density, BLE Middle Channel



Date: 23.MAY.2019 19:10:13

### Power Spectral Density, BLE High Channel



Date: 23.MAY.2019 19:08:06

\*\*\*\*\* END OF REPORT \*\*\*\*\*