



Nemko USA, Inc.
11696 Sorrento Valley Rd., Suite F
San Diego, CA 92121-1024
Phone (858) 755-5525 Fax (858) 452-1810

PART 15.249, SUBPART C

For The **Track Tag Module**

Model: **TT2500**

FCC ID: TXZTT2500

PREPARED FOR:

SYS Technologies
5050 Murphy Canyon Rd, Suite 200
San Diego, Ca. 92123

PREPARED ON FEBRUARY 16, 2006

REPORT NUMBER 2006 020741 FCC

PROJECT NUMBER: 2006 020741 FCC

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DOCUMENT HISTORY

REVISION	DATE	COMMENTS
-	February 16 th , 2006	Prepared By: Chip Fleury
-	February 16 th , 2006	Initial Release: Chip Fleury

NOTE: Nemko USA, Inc. hereby makes the following statements so as to conform to Chapter 10 (Test Reports) Requirements of ANSI C63.4 (2003) “Methods and Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz”:

- The unit described in this report was received at Nemko USA, Inc.'s facilities on Jan 30, 2006. Testing was performed on the unit described in this report on February 3, to February 15, 2006.
- The Test Results reported herein apply only to the Unit actually tested, and to substantially identical Units.
- This report does not imply the endorsement of the Federal Communications Commission (FCC), NVLAP or any other government agency.

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CERTIFICATION

Nemko USA, Inc., an independent Electromagnetic Compatibility (EMC) Test Laboratory, produced this Test Report and performed the Radio Frequency Interference (RFI) testing and data evaluation contained herein.

Nemko USA, Inc.'s measurement facility is currently registered with the United States Federal Communications Commission (FCC) in accordance with the provisions of 47 United States Code (CFR) Part 2, Subpart I, Section 2.948(a). A current description of Nemko USA, Inc.'s measurement facility is on file with the FCC. Nemko USA Inc. has additionally satisfied the FCC that it complies with the requirements set forth in 47 CFR Part 2, Subpart I, Section 2.948(d) regarding the accreditation of EMC laboratories.

The RFI testing, test data collection and test data evaluation were accomplished in accordance with the ANSI C63.4-2003 Standard, and in accordance with the applicable sections of the FCC rules (47 CFR Parts 2 and 15). The administrative summary of this test report provides a description of the test sample.

I hereby certify that the test data, test data evaluation, and equipment configurations used to compile this test report are a true and accurate representation of the test sample's radio frequency interference characteristics as of the test date(s), and, for the design of the test sample.

FR Fleury

Manager of EMC Operations

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1. ADMINISTRATIVE DATA AND TEST SUMMARY

Administrative Data

CLIENT:

SYS Technologies
5050 Murphy Canyon Rd, Suite 200
San Diego, Ca 92123
858-244-7380
858-715-5510 fax

CONTACT:

Patricia Reed

DATE (S) OF TEST:

February 3rd--15th, 2006

EQUIPMENT UNDER TEST (EUT):

Track Tag Module

Model

TT2500

Condition Upon Receipt

Suitable for Test

TEST SPECIFICATION:

FCC, Part 15.249, Subpart C, Output power and spurious emission. Test Summary

<i>Specification</i>	<i>Frequency Range</i>	<i>Compliance Status</i>
FCC, CFR 47, Section 15.207	0.15 MHz - 30.00 MHz	N/A
FCC, CFR 47, Section 15.209	30 MHz – 10 th Harmonic	PASS
FCC CFR 47, §15.249 Plus Bandedge	2433.8 - 2480 MHz	PASS

Testing was started at 30 MHz as there are no RF signals generated below this frequency.
Battery operated device.

Test Supervisor : *FR Fleury*
Nemko, USA

Refer to the test results section for further details.

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2. SYSTEM CONFIGURATION

Description of EUT

The TT2500 Track Tag Module is an RF module to provide vehicle inventory capabilities.

System Components and Power Cables

DEVICE	MANUFACTURER	POWER CABLE
	MODEL # SERIAL #	
EUT - Track Tag Module	SYS Technolgies Model: TT2500	Battery operated no cable
EUT Power Supply	N/A	N/A
Support Equipment	N/A	N/A

Device Interconnection and I/O Cables

CONNECTION	I/O CABLE
N/A	N/A

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Test Configuration

The Track Tag Module – TT2500 was set up to transmit at high power at 2433.8, 2458.5 and 2480 MHz, representing transmission at low, mid and high frequencies. Test of each fundamental and all measurable harmonics was then performed during this evaluation. The intent of this testing was to show compliance of the EUT when testing to the 15.249 requirements with two antenna configuration.

The Wireless transmitter has remained the same so this testing is to confirm continued compliance with FCC part 15.249 spurious emissions and FCC part 209. Previous report is included in package.

Design Modifications for Compliance

Device: Track Tag module

Model: TT2500

The following design modifications were made to the EUT during testing.

No design modifications were made to the EUT during testing.

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3. DESCRIPTION OF TEST SITE AND EQUIPMENT

Description of Test Site

The test site is located at 11696 Sorrento Valley Road, Suite F, San Diego, CA 92121. The site is physically located 18 miles Northwest of downtown San Diego. The general area is a valley 1.5 miles east of the Pacific Ocean. This particular part of the valley tends to minimize ambient levels, i.e. radio and TV broadcast stations and land mobile communications. The three and ten-meter Open Area Test Site (OATS) is located behind the office/lab building. It conforms to the normalized site attenuation limits and construction specifications as set in the EN 55022 (1987), CISPR 16 and 22 (1985) and ANSI C63.4-2003 documents. The OATS normalized site attenuation characteristics are verified for compliance every year.

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4. DESCRIPTION OF TESTING METHODS

Introduction

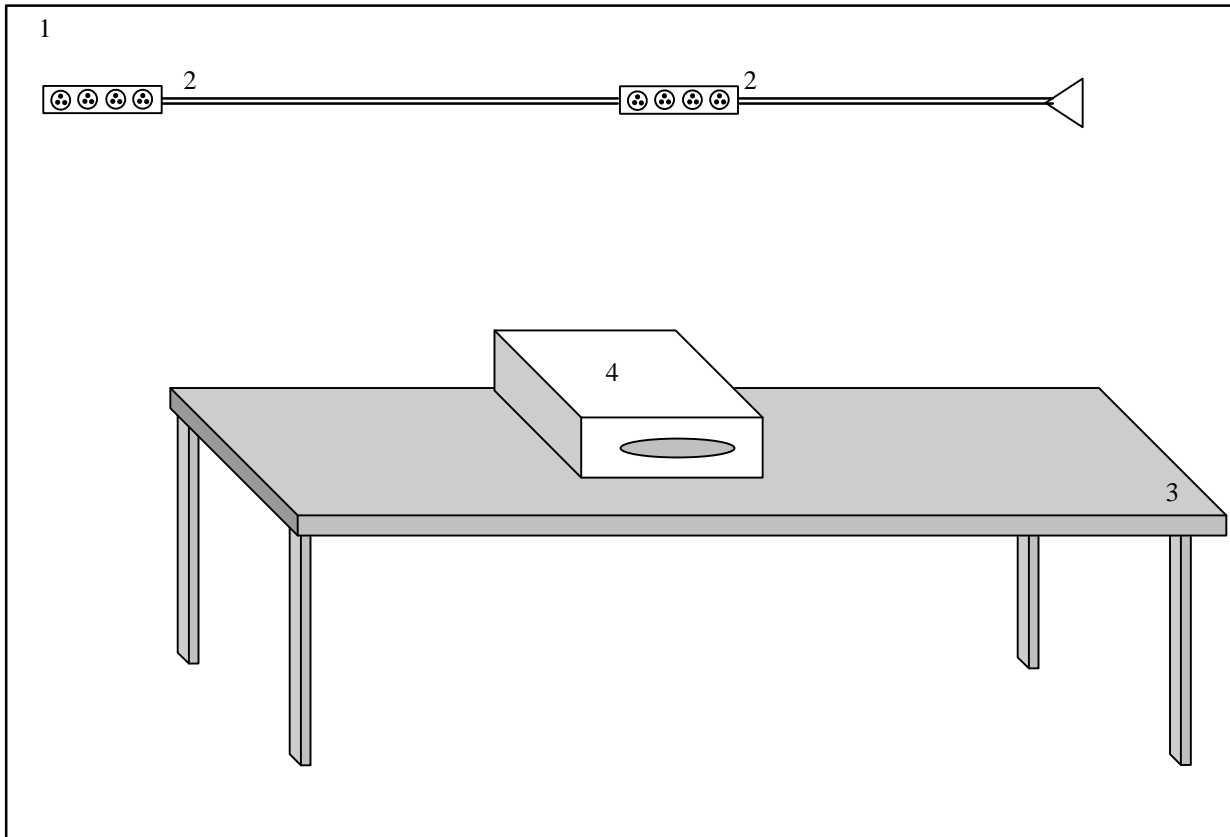
As required in 47 CFR, Parts 2 and 15, the methods employed to test the radiated and conducted emissions (as applicable) of the EUT are those contained within the American National Standards Institute (ANSI) document C63.4-2003, titled "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz." All applicable FCC Rule Sections that provide further guidance for performance of such testing are also observed.

For General Test Configuration please refer to Figure 1 on the following page.

Digital devices sold in Canada are required to comply with the Interference Causing Equipment Standard for Digital Apparatus, ICES-003. These test methods and limits are specified in the Canadian Standards Association's (CSA) Standard C108.8-M1983 (1-1-94 version) and are "essentially equivalent" with FCC, Part 15 and CISPR 22 (EN55022) rules for unintentional radiators per EMCAB-3, Issue 3 (May 1998). No further testing is required for compliance to ICES-003.

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Figure 1. General EUT Test Setup Diagram



NOT TO SCALE

CONFIGURATION LEGEND

1. Test Laboratory
2. AC Power for Peripheral Devices (120V, 60 cycles, single phase) – Not used
3. Non-Conducting tables 80 cm above ground plane
4. EUT: Track Tag Module

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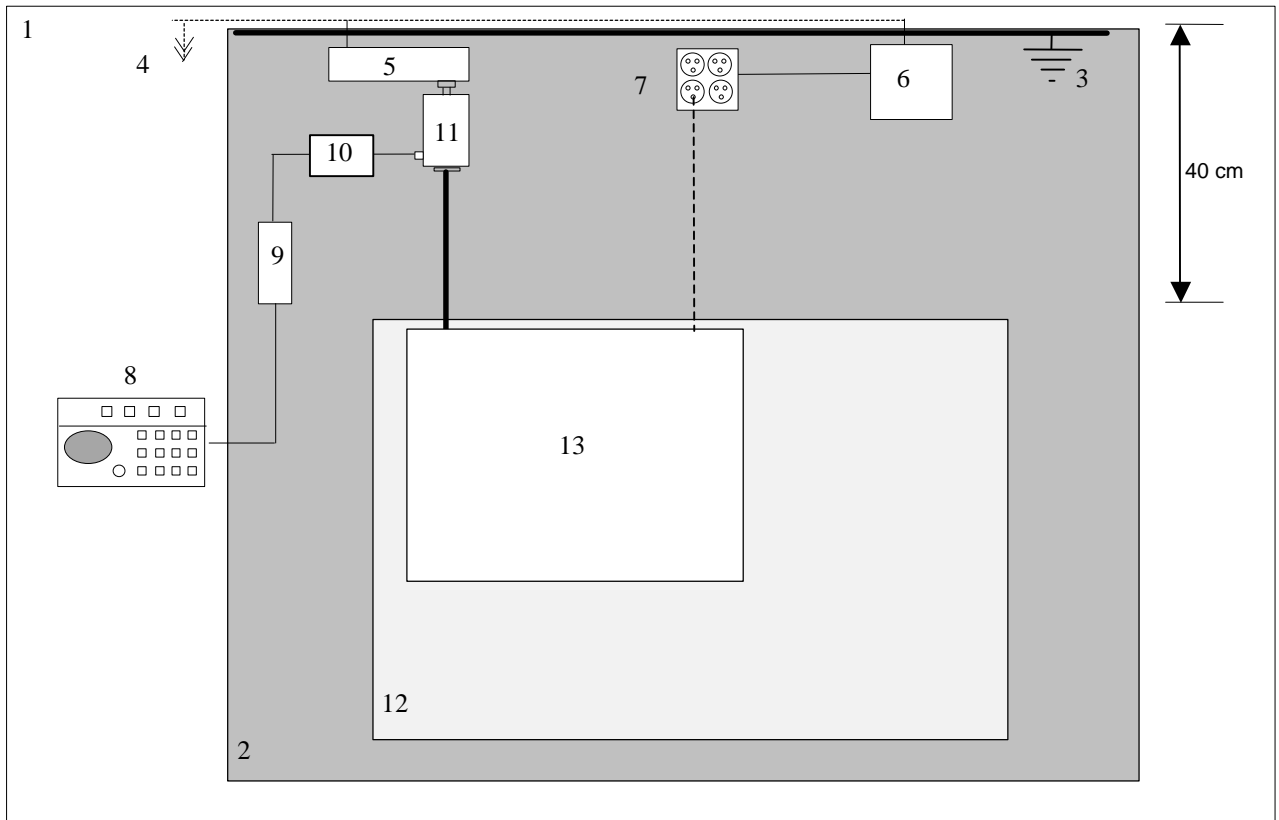
Configuration and Methods of Measurements for Conducted Emissions

Section 7 of ANSI C63.4 determines the general configuration of the EUT and associated equipment, as well as the test platform for conducted emissions testing. Tabletop devices are placed on a non-conducting surface 80 centimeters above the ground plane floor and 40 centimeters from the ground plane wall. The EUT and associated system are configured to operate continuously, representing a “normally operating” mode. The EUT is powered via a Line Impedance Stabilization Network (LISN). The emissions are recorded using the required bandwidth of 9 kHz in the quasi-peak mode. The average amplitude is also observed employing a 10 kHz bandwidth to determine the presence of broadband RFI. When such interference is caused by broadband sources (as defined by the FCC and ANSI Rules), the deviation guidelines contained in Section 11.3.1 of ANSI C63.4 are employed, which allows a correction factor of 13 dB to be subtracted from the quasi-peak reading. The emission levels are then compared to the applicable FCC limits to determine compliance.

For Conducted Emissions Test Configuration please refer to Figure 2 on the following page.

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Figure 2. Conducted Emissions Test Setup Diagram



NOT TO SCALE

CONFIGURATION LEGEND

1. Test Laboratory (6 X 6 meters)
2. Ground Plane (15 square meters)
3. Vertical Conducting Wall (Grounded through Ground Plane via 10' ground rod)
4. AC Power for Devices
5. Power Line Filter, Lindgren, 120 dB, 30 amp
6. Line Impedance Stabilization Network (LISN) for peripheral devices
7. Power Distribution Box for peripheral devices
8. Spectrum Analyzer with Quasi-Peak Adapter
9. High Pass Filter
10. Transient Limiter
11. LISN for EUT
12. Non-Conducting table 80 cm above ground plane
13. EUT: Not Applicable

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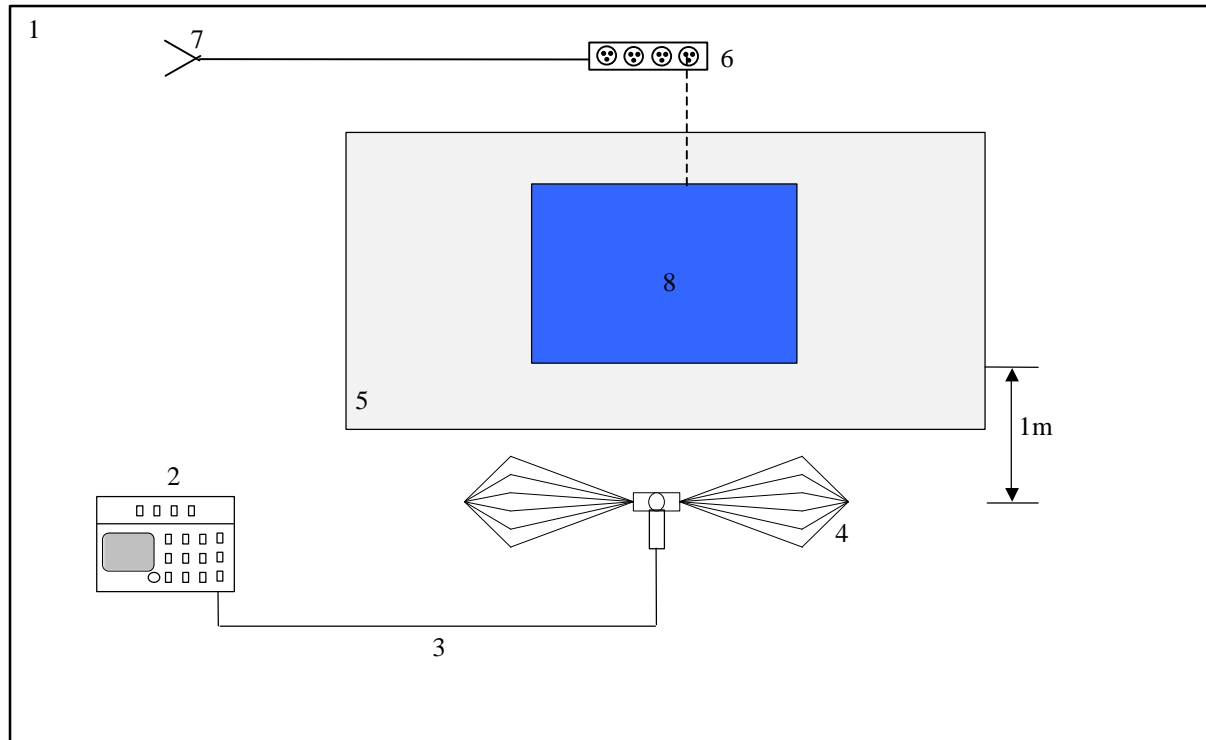
Configuration and Methods of Measurements for Frequency Identification

When performing all testing of equipment, the actual emissions of the EUT are segregated from ambient signals present within the laboratory or the open-field test range. Preliminary testing is performed to ensure that ambient signals are sufficiently low to allow for proper observation of the emissions from the EUT. Incoming power lines are filtered using a 120 dB, 30-ampere; 115/208-volt filter to assist in reducing ambient signals for tests of levels of conducted emissions. Ambients within the laboratory are compared to those noted at the nearby open-field site to discriminate between signals produced from the EUT and ambient signals. In the event that a significant emission is produced by the EUT at a frequency which is also demonstrating significant ambient signals, the spectrum analyzer is placed in the peak mode, the bandwidth is narrowed, the EUT's signal is centered on the analyzer, the scan width is expanded to 50 kHz while monitoring the audio to ensure that only the EUT signal is present, the analyzer is switched to quasi-peak mode, and the level of the EUT signal is recorded.

For Frequency ID Test Configuration please refer to Figure 3 on the following page.

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Figure 3. Frequency ID of Radiated Emissions Test Setup Diagram



NOT TO SCALE

CONFIGURATION LEGEND

1. Test Laboratory
2. Spectrum Analyzer with Quasi-Peak Adapter
3. Coax interconnect from Antenna to Spectrum Analyzer
4. Receive Antenna (basic relative position)
5. Non-Conducting table 80 cm above ground plane
6. Power strip for EUT and peripherals
7. AC power for devices
8. EUT Wireless Base Station and Associated System

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Configuration and Methods of Measurements for Radiated Emissions

Section 8 of ANSI C63.4 determines the general configuration and procedures for measuring the radiated emissions of equipment under test. Initially, the primary emission frequencies are identified inside the test lab by positioning a broadband receive antenna one meter from the EUT to locate frequencies of significant radiation. Next, the EUT and associated system are placed on a turntable on a ten meter open area test site (registered with the FCC in accord with its Rules and ANSI C63.4) and the receive antenna is located at a distance of ten meters from the EUT.

The EUT and associated system are configured to operate continuously, representing a “normally operating” mode. All significant radiated emissions are recorded when maximum radiation on each frequency is observed, in accordance with part 8 of ANSI C63.4-2003 and Section 15.33 of the FCC Rules. To ensure that the maximum emission at each discrete frequency of interest is observed, the receive antenna is varied in height from one to four meters and rotated to horizontal and vertical polarities, and the turntable is also rotated to determine the worst emitting configuration. The numerical results of the test are included herein to demonstrate compliance.

The numerical results that are applied to the emissions limits are arrived at by the following method:

Example: $A = RR + CL + AF$

A = Amplitude dBuV/m

RR = Receiver Reading dBuV

CL = cable loss dB

AF = antenna factor dB

Example Frequency = 110MHz

18.5 dBuV (spectrum analyzer reading)

+3.0 dB (cable loss @ frequency)

21.5 dBuV

+15.4 dB (antenna factor @ frequency)

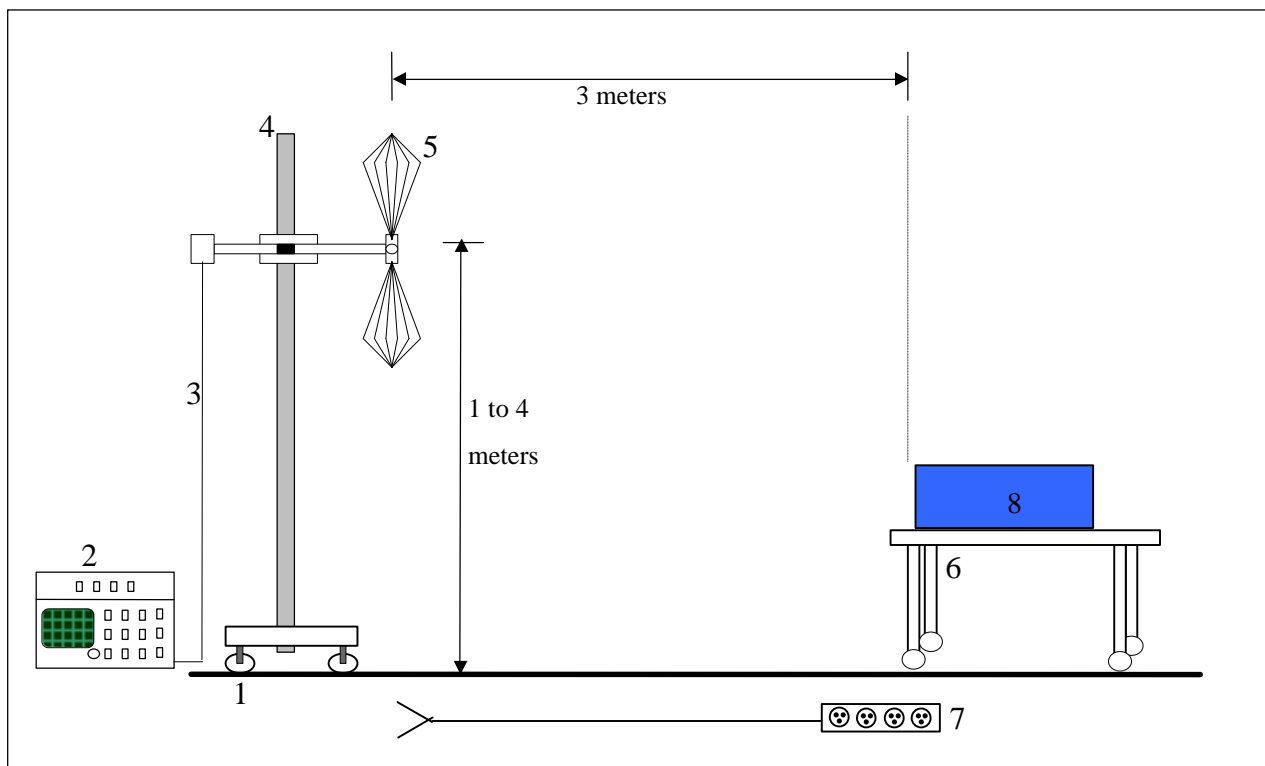
36.9 dBuV/m Final adjusted value

The final adjusted value is then compared to the appropriate emission limit to determine compliance.

For Radiated Emissions Test Configuration please refer to Figure 4 on the following page.

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Figure 4. Radiated Emissions Test Setup Diagram



NOT TO SCALE

CONFIGURATION LEGEND

1. Ground plane (11 X 17 meters)
2. Spectrum Analyzer with Quasi-Peak Adapter
3. Coax interconnect from Receive Antenna to Spectrum Analyzer
4. Antenna Mast with motorized mounting assembly
5. Receive Antenna (basic relative position)
6. Non-Conducting table 80 cm above ground plane
7. AC power for devices – Not Used
8. EUT: Track Tag Module

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Operation in the 15.249 bands

In Addition to the general radiated emissions requirements described in FCC, Part 15B, Section 15.249 determines the configuration and procedures for measuring additional emissions of Intentional Radiating Devices.

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5. TEST RESULTS

Conducted Emissions Test Data

N/A

Conducted Emissions Test Equipment

N/A

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5.3 Radiated Emissions Test Data –

Radiated Emissions Data

Complete	YES	Job # :	25-741-SYS	Test # :	1
Preliminary			Page 1	of	1
Client Name :	SYS Technologies				
EUT Name :	TRACK TAG MODULE				
EUT Model # :	TT2500				
EUT ANTENNA Part # :					
EUT Serial # :					
EUT Config. :	Transmit				
Specification :	FCC Part 15.209 (a)/FCC Part 15.249				
Rod. Ant. #:	NA	Temp. (deg. C) :		Date :	2/13/2006
Bicon Ant.#:	114	Humidity (%) :		Time :	
Log Ant.#:	110	EUT Voltage :	3.6 Vdc	Staff :	CF
DRG Ant. #	529	EUT Frequency :	na	Photo ID:	
Dipole Ant.#:	NA	Phase:	na	Peak Res Bandwidth:	1 MHz
Cable#:	40ft	Location:		Peak Video Bandwidth	1 MHz
Preamp#:	317	Distance:	3 m	AVE Res Bandwidth:	1 MHz
Spec An.#:	835	Duty Cycle Factor		AVE Video Bandwidth	10 Hz
QP #:	NA				

[illegible]

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CFR 47 Part 15c §15.249 Test Results

1. Testing was completed to the 10th harmonic, i.e. 1000 MHz to 25 GHz. No harmonics were noted other than those in the spreadsheet above
2. All measurements were made with a peak detector at 1MHz RBW and VBW and then repeated for average measurements at 1MHz RBW and 10Hz VBW.
3. The EUT was tested with the antenna in three orthogonal orientations and the worst case emissions is presented above. A new battery was installed before test.
4. The bandedge measurement was performed as follows. The transmitter lowest and highest transmit frequencies were low enough to measure the bandedges directly with the result being noise floor emissions. No emissions were noted at the bandedges.
5. All tests were performed with the 5.5 dBi antenna. This is worst case.

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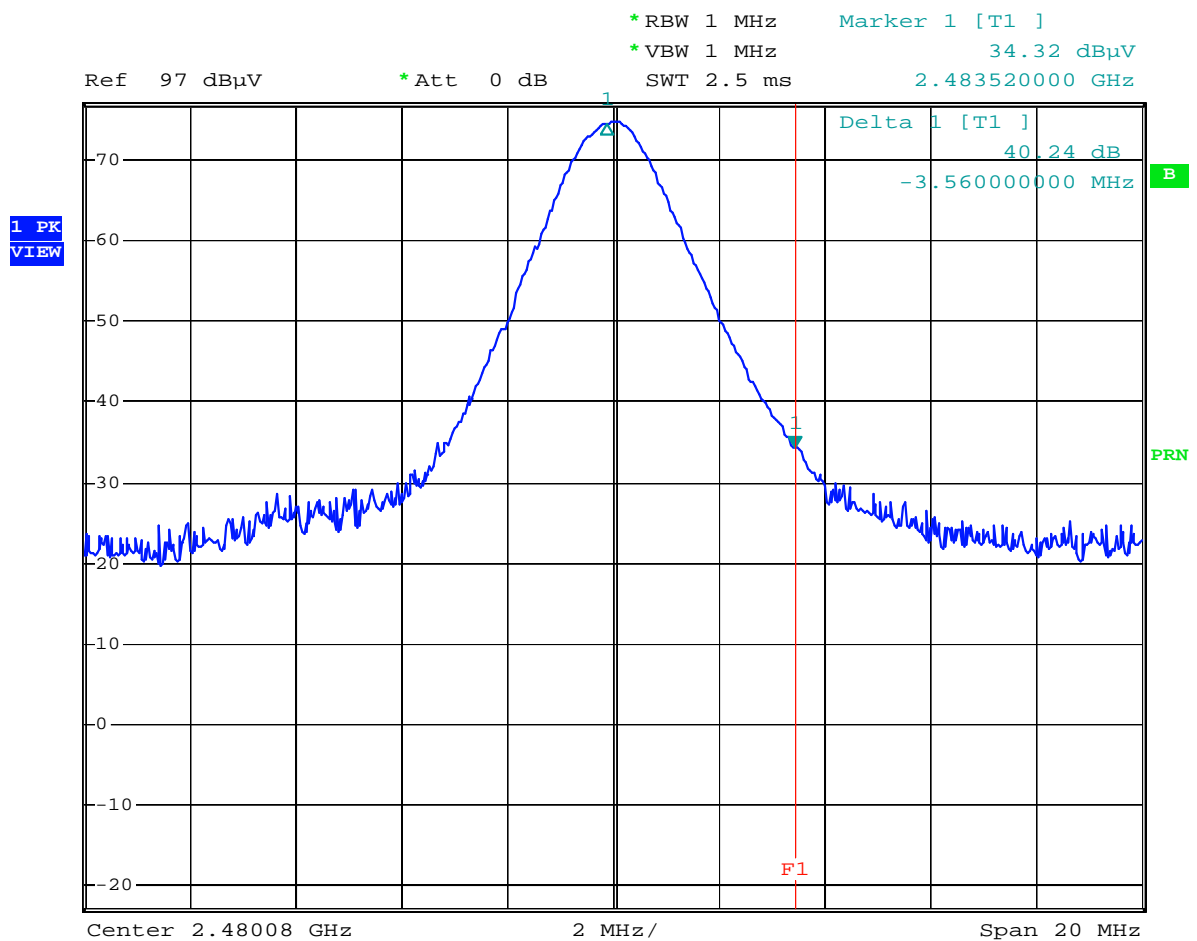
Upper Bandedge

Peak bandedge meets average limits. EUT complies.

Delta from Plot below = 34.32

Level = $(61.4 - 34.3) = 27.1\text{dBuV/m}$

Limit = 54 dBuV/m



Date: 15.FEB.2006 16:17:31

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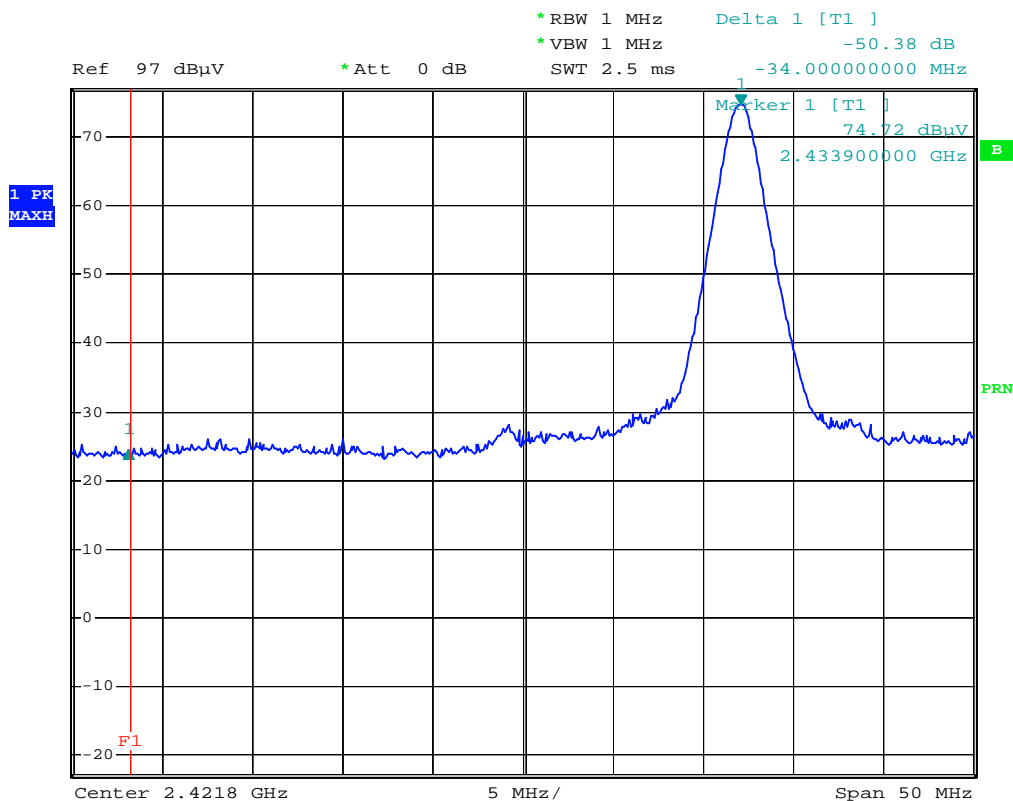
Lower Bandedge

EUT complies.

Peak Delta from Plot below = 50.3

Level = $(62.7 - 50.3) = 12.4$ dBuV/m

Limit = -20 dBc = $(62.7 - 20) = 42.7$ dBuV/m



Date: 15.FEB.2006 15:16:14

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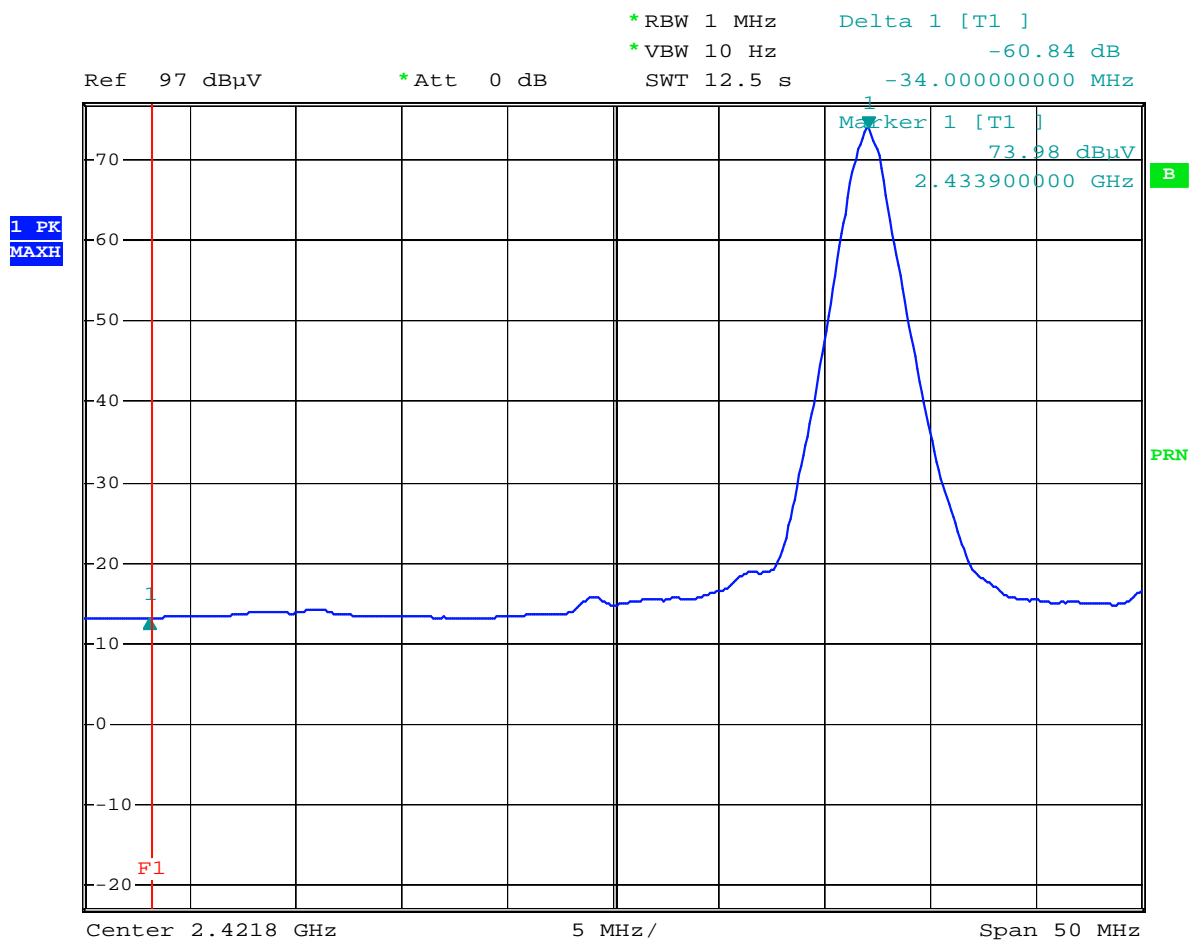
Lower Bandedge

EUT complies.

Average Delta from Plot below = 60.8

Level = $(58.5 - 60.8) = -2.3$ dBuV/m

Limit = -20 dBc = $(58.5 - 20) = 38.5$ dBuV/m



Date: 15.FEB.2006 15:17:46

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APPENDIX A

A. Conducted & Radiated Emissions Measurement Uncertainties

1. Introduction

ISO Standard 17025 and ANSI/NCSL Z540-1(1994) require that all measurements contained in a test report be “traceable”. “Traceability” is defined in the *International Vocabulary of Basic and General Terms in Metrology* (ISO: 1993) as: “the property of the result of a measurement... whereby it can be related to stated references, usually national or international standards, through an unbroken chain of comparisons, *all having stated uncertainties*”.

The purposes of this Appendix are to “state the *Measurement Uncertainties*” of the conducted emissions and radiated emissions measurements contained in Section 5 of this Test Report, and to provide a practical explanation of the meaning of these measurement uncertainties.

2. Statement of the Worst-Case Measurement Uncertainties for the Conducted and Radiated Emissions Measurements Contained in This Test Report

Table 1: Worst-Case Expanded Uncertainty "U" of Measurement for a k=2 Coverage Factor

Conducted Emissions Measurement Detection Systems	Applicable Frequency Range	"U" for a k=2 Coverage Factor
HP8568B Spectrum Analyzer with QPA and HP8447F Preamplifier	150 kHz - 30 MHz	+/- 3.0 dB
HP8566B Spectrum Analyzer with QPA and Preselector	9 kHz - 30 MHz	+/- 2.9 dB
Radiated Emissions Measurement Detection Systems	Applicable Frequency Range	"U" for a k=2 Coverage Factor
HP8568B Spectrum Analyzer with QPA & HP8447F Preamplifier	30 MHz - 200 MHz	+4.0 dB, -4.1 dB
HP8568B Spectrum Analyzer with QPA & HP8447F Preamplifier	200 MHz-1000 MHz	+/- 3.5 dB
HP8566B Spectrum Analyzer with QPA & Preselector	30 MHz - 200 MHz	+3.9 dB, -4.0 dB
HP8566B Spectrum Analyzer with QPA & Preselector	200 MHz-1000 MHz	+/- 3.4 dB
HP8566B Spectrum Analyzer with QPA & HP 8449A Preamplifier	1 GHz - 18 GHz	+2.5 dB, -2.6 dB
HP8566B Spectrum Analyzer with QPA & HP8449A Preamplifier	18 GHz - 40 GHz	+/- 3.4 dB

NOTES:

1. Applies to 3 and 10 meter measurement distances
2. Applies to all valid combinations of Transducers (i.e. LISNs, Line Voltage Probes, and Antennas, as appropriate)
3. Excludes the Repeatability of the EUT

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3. Practical Explanation of the Meaning of the Conducted and Radiated Emissions Measurement Uncertainties

In general, a “Statement of Measurement Uncertainty” means that with a certain (specified) confidence level, the “true” value of a measurand will be between a (stated) upper bound and a (stated) lower bound.

In the specific case of EMC Measurements in this test report, the measurement uncertainties of the conducted emissions measurements and the radiated emissions measurements have been calculated in accordance with the method detailed in the following documents:

- *ISO Guide to the Expression of Uncertainty in Measurement* (ISO, 1993)
- NIS 81:1994, *The Treatment of Uncertainty in EMC Measurements* (NAMAS, 1994)
- NIST Technical Note 1297(1994), *Guidelines for Evaluating and Expressing the Uncertainty of NIST Measurement Results* (NIST, 1994)

The calculation method used in these documents requires that the stated uncertainty of the measurements be expressed as an “*expanded uncertainty*”, *U*, with a *k=2 coverage factor*. The practical interpretation of this method of expressing measurement uncertainty is shown in the following example:

EXAMPLE: Assume that at 39.51 MHz, the (measured) radiated emissions level was equal to +26.5 dBuV/m, and that the +/- 2 standard deviations (i.e. 95% confidence level) measurement uncertainty was +/- 3.4 dB.

In the example above, the phrase “*k = 2 Coverage Factor*” simply means that the measurement uncertainty is stated to cover +/-2 standard deviations (i.e. a 95% confidence interval) about the measurand. The measurand is the radiated emissions measurement of +26.5 dBuV/m at 39.51 MHz, and the 95% bounds for the uncertainty are -3.4 dB to + 3.4 dB. One can thus be 95% confident that the “true” value of the radiated emissions measurement is between +23.1 dBuV/m and +29.5 dBuV/m. *In effect, this means that in the above example there is only a 2.5% chance that the “true” radiated emissions value exceeds +29.5 dBuV/m.*

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APPENDIX B

B. Nemko USA, Inc.'s Test Equipment & Facilities Calibration Program

Nemko USA, Inc. operates a comprehensive Periodic Calibration Program in order to ensure the validity of all test data. Nemko USA's Periodic Calibration Program is fully compliant to the requirements of NVLAP Policy Guide PG-1-1988, ANSI/NCSL Z540-1 (1994), ISO 10012-1 (1993-05-01), ISO Standard 17025, ISO-9000 and EN 45001. Nemko USA, Inc.'s calibrations program therefore meets or exceed the US national commercial and military requirements [N.B. ANSI/NCSL Z540-1 (1994) replaces MIL-STD-45662A].

Specifically, all of Nemko USA's *primary reference standard devices* (e.g. vector voltmeters, multimeters, attenuators and terminations, RF power meters and their detector heads, oscilloscope mainframes and plug-ins, spectrum analyzers, RF preselectors, quasi-peak adapters, interference analyzers, impulse generators, signal generators and pulse/function generators, field-strength meters and their detector heads, etc.) and certain *secondary standard devices* (e.g. RF Preamplifiers used in CISPR 11/22 and FCC Part 15/18 tests) are periodically recalibrated by:

- A Nemko USA-approved independent (third party) metrology laboratory that uses NIST-traceable standards and that is ISO Guide 25-accredited as a calibration laboratories by NIST; or,
- A Nemko USA-approved independent (third party) metrology laboratory that uses NIST-traceable standards and that is ISO Guide 25-accredited as a calibration laboratory by another accreditation body (such as A2LA) that is mutually recognized by NIST; or,
- A manufacturer of Measurement and Test Equipment (M&TE), if the manufacturer uses NIST-traceable standards and is ISO Guide 25-accredited as calibration laboratory either by NIST or by another accreditation body (such as A2LA) that is mutually recognized by NIST; or
- A manufacturer of M&TE (or by a Nemko USA-approved independent third party metrology laboratory) that is not ISO Guide 25-accredited. (In these cases, Nemko USA conducts an annual audit of the manufacturer or metrology laboratory for the purposes of proving traceability to NIST, ensuring that adequate and repeatable calibration procedures are being applied, and verifying conformity with the other requirements of ISO Guide 25).

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In all cases, the entity performing the Calibration is required to furnish Nemko USA with a calibration test report and/or certificate of calibration, and a “calibration sticker” on each item of M&TE that is successfully calibrated.

Calibration intervals are normally one year, except when the manufacture advises a shorter interval (e.g. the HP 8568B Spectrum Analyzer is recalibrated every six months) or if US Government directives or client requirements demand a shorter interval. Items of instrumentation/related equipment which fail during routine use, or which suffer visible mechanical damage (during use or while in transit), are sidelined pending repair and recalibration. (Repairs are carried out either in-house [if minor] or by a Nemko USA-approved independent [third party] metrology laboratory, or by the manufacturer of the item of M&TE).

Each antenna used for CISPR 11 and CISPR 22 and FCC Part 15 and Part 18 radiated emissions testing (and for testing to the equivalent European Norms) is calibrated annually by either a NIST (or A2LA) ISO Standard 17025-Accredited third-party Antenna Calibration Laboratory or by the antenna’s OEM if the OEM is NIST or A2LA ISO Standard 17025-accredited as an antenna calibration laboratory. The antenna calibrations are performed using the methods specified in Annex G.5 of CISPR 16-1(1993) or ANSI C63.5-1991, including the “Three-Antenna Method”. Certain other kinds of antennas (e.g. magnetic-shielded loop antennas) are calibrated annually by either a NIST (or A2LA) ISO Standard 17025-accredited third-party antenna calibration laboratory, or by the antenna’s OEM if the OEM is NIST or A2LA ISO Standard 17025-accredited as an antenna calibration laboratory using the procedures specified in the latest version of SAE ARP-958.

In accordance with FCC and other regulations, Nemko USA recalibrates its suite of antennas used for radiated emissions tests on an annual basis. These calibrations are performed as a precursor to the FCC-required annual revalidation of the Normalized Site Attenuation properties of Nemko USA’s Open Area Test Site. Nemko USA, Inc. uses the procedures given in both Subclause 16.6 and Annex G.2 of CISPR 16-1 (1993), and, ANSI C63.4-2003 when performing the normalized site attenuation measurements.