



FCC PART 15 SUBPART C
TEST AND MEASUREMENT REPORT

For

Teleepoch Limited

5A, B1 Building, Digital Tech Zone, High Tech Park (South),
Nanshan District, Shenzhen, Guangdong, China

FCC ID: U46-CDM2035

Report Type: Original Report	Product Type: CDMA Mobile Phone
Test Engineer: <u>Quinn Jiang</u> 	
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Reviewed By: <u>RF/EMC Lead</u>  Victor Zhang	
Prepared By: <u>Bay Area Compliance Laboratories Corp.</u> (SP) 1274 Anvilwood Avenue, Sunnyvale, CA 94089, USA Tel: (408) 732-9162 Fax: (408) 732 9164	

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* This report may contain data that are not covered by the NVLAP accreditation and are marked with an asterisk “*” (Rev.2)

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1201271-247	Original Report	2012-02-27

1 General Information

1.1 Product Description for Equipment under Test (EUT)

This test and measurement report was prepared on behalf of *TELEPOCH Limited* and their product, *model: CDM2035C, FCC ID: U46-CDM2035* or the “EUT” as referred to in this report. The EUT is CDMA 1x Cell Phone with Bluetooth technologies.

1.2 Mechanical Description of EUT

The EUT measures approximately 50 mm (**L**) x 10 mm (**W**) x 110 mm (**H**) and weighs approximately 9 g.

The data gathered are from a typical production sample provided by the manufacturer with serial: D561548202000223 for conducted tests and D56154820200021 for radiated tests provided by the manufacture.

1.3 Objective

This report is prepared on behalf of *TELEPOCH Limited* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commissions rules.

1.4 Related Submittal(s)/Grant(s)

FCC Part 22H, 24E and 27 PCE submissions with FCC ID: U46-CDM2035.

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.4-2003.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in 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.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the values range from ± 2.0 for Conducted Emissions tests and ± 4.0 dB for Radiated Emissions tests are the most accurate estimates pertaining to uncertainty of EMC measurements at BACL.

Detailed instrumentation measurement uncertainties can be found in BACL report QAP-018.

1.7 Test Facility

The semi-anechoic chambers used by BACL to collect radiated and conducted emissions measurement data is located in the building at it's facility in Sunnyvale, California, USA.

BACL's test sites have been fully described in reports submitted to the Federal Communication Commission (FCC) and Voluntary Control Council for Interference (VCCI). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on February 11 and December 10, 1997 and Article 8 of the VCCI regulations on December 25, 1997. The facility complies with the radiated and AC line conducted test site criteria set forth in ANSI C63.4-2003.

The Federal Communications Commission and Voluntary Control Council for Interference has the reports on file and is listed under FCC registration number: 90464 and VCCI Registration No.: C-1298 and R-1234. The test site has been approved by the FCC and VCCI for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, BACL is a National Institute of Standards and Technology (NIST) accredited laboratory, under the National Voluntary Laboratory Accredited Program (Lab Code 200167-0). The current scope of accreditations can be found at <http://ts.nist.gov/ts/htdocs/210/214/scopes/2001670.htm>

2 System Test Configuration

2.1 Justification

The system was configured for testing in accordance with ANSI C63.4-2003.
The EUT was tested in the testing mode to represent *worst*-case results during the final qualification test.

2.2 EUT Exercise Software

The software is provided by customer. The EUT exercise program used during radiated testing was designed to exercise the system components.

Radio Mode	Frequency (MHz)		
	Low Channel	Middle Channel	High Channel
Bluetooth	2402	2441	2480

2.3 Special Accessories

N/A.

2.4 Equipment Modifications

No modifications were made to the EUT.

2.5 Local Support Equipment

Manufacturer	Description	Model No.	Serial No.
DELL	Laptop	Latitude D600	CX-0X2034-48643-3A6-8307

2.6 Power Supply and Line Filters

Manufacturer	Description	Model	Serial Number
PCD Switching Adapter	AC/DC Adapter	A26-50500	CNR2080

2.7 Interface Ports and Cabling

Cable Description	Length (m)	From	To
RF Cable	< 1	EUT	Spectrum Analyzer
USB Cable	1	EUT	Laptop

2.8 Internal Parts List and Details

Manufacturers	Descriptions	Models	Serial Numbers
PCD	PCB Board	CDM2035C	D56154820200021

3 Summary of Test Results

FCC Rules	Description of Test	Result
FCC §15.247 (i), §2.1093	RF Exposure	Compliant
FCC §15.203	Antenna Requirements	Compliant
FCC §15.207 (a)	AC Line Conducted Emissions	Compliant
FCC §15.247(d)	Spurious Emissions at Antenna Port	Compliant
FCC §15.205, §15.209, §15.247(d)	Restricted Bands, Spurious Radiated Emissions	Compliant
FCC §15.247 (a)(1)	20 dB Channel Bandwidth	Compliant
FCC §15.247 (a)(1)	Hopping Channel Separation	Compliant
FCC §15.247 (a)(1)	Dwell Time	Compliant
FCC §15.247(a)(1)	Number of Hopping Channels	Compliant
FCC §15.247(a)	Maximum Peak Output Power	Compliant
FCC §15.247(d)	Band Edge	Compliant

4 FCC §15.203 – Antenna Requirements

4.1 Applicable Standard

For intentional device, according to FCC Part §15.203, an intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used.

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 measurement or on data from the antenna manufacturer. Any antenna gain in excess of 6 dBi (6 dB above isotropic gain) shall be added to the measured RF output power before using the power limits specified in IC RSS-210 or RSS-310 for devices of RF output powers of 10 milliwatts or less. For devices of output powers greater than 10 milliwatts, except devices subject to IC RSS-210 Annex 8 or RSS-210 Annex 9, the total antenna gain shall be added to the measured RF output power before using the specified power limits. For devices subject to IC RSS-210 Annex 8 or Annex 9, the antenna gain shall not be added.

4.2 Result

The EUT has maximum gain of 2.0 dBi antenna, which in accordance to sections FCC Part 15.203, is considered sufficient to comply with the provisions of these sections. Please refer to the EUT photos.

5 FCC §15.207 - AC Line Conducted Emissions

5.1 Applicable Standards

As per FCC §15.207 Conducted limits:

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

Frequency of Emission (MHz)	Conducted Limit (dBuV)	
	Quasi-peak	Average
0.15-0.5	66 to 56 ¹	56 to 46 ¹
0.5-5	56	46
5-30	60	50

Note ¹: Decreases with the logarithm of the frequency.

5.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.4-2003 measurement procedure. The specification used was FCC Part15.207 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

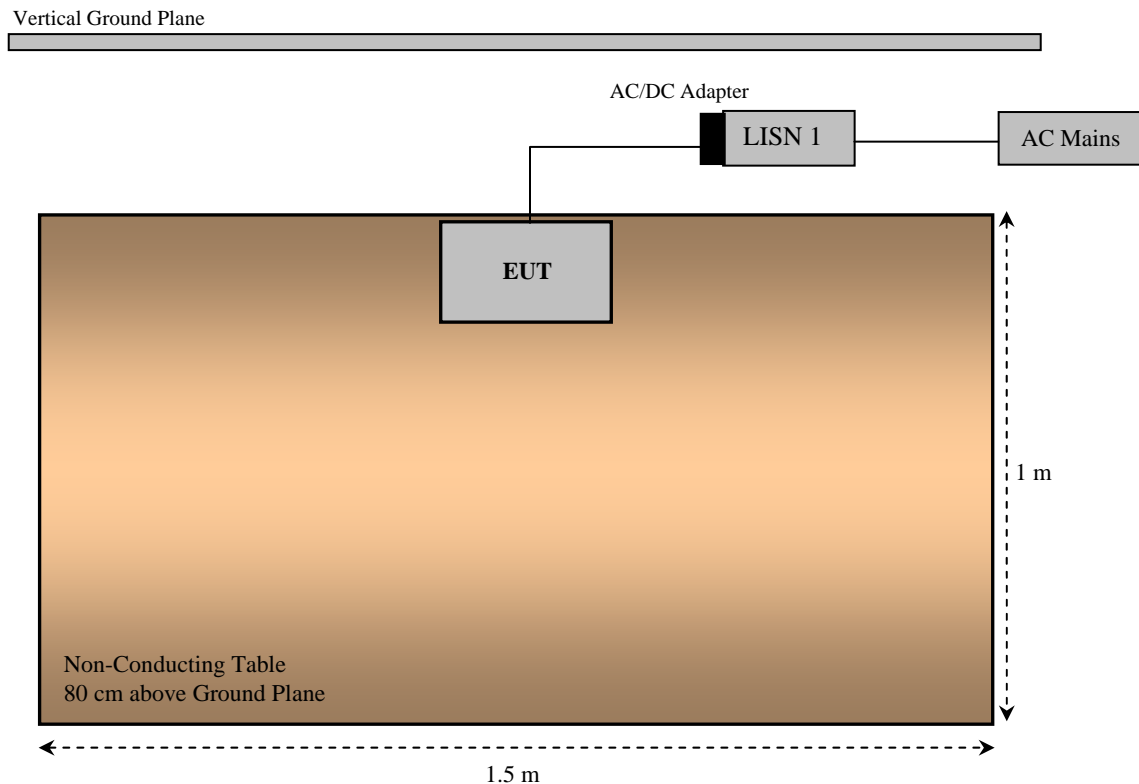
The AC/DC power adapter was connected with LISN-1 which provided 120 V/60 Hz AC power.

5.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100338	2011-09-14
Solar Electronics	LISN	9252-R-24-BNC	511205	2011-06-25
TTE	Filter, High Pass	H9962-150K-50-21378	K7133	2011-06-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

5.4 Test Setup Block Diagram



5.5 Test Procedure

During the conducted emissions test, the power cord of the EUT was connected to the mains outlet of the LISN-2.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data was recorded in the peak detection mode, quasi-peak and average. Quasi-Peak readings are distinguished with a “QP.” Average readings are distinguished with an “Ave”.

5.6 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-11 in 5 meter chamber #2.

5.7 Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Cable Loss, and Attenuator Factor adding to the Indicated Reading. The basic equation is as follows:

$$\text{Corrected Amplitude} = \text{Indicated Reading} + \text{Cable Loss} + \text{Attenuator Factor}$$

For example, a Corrected Amplitude of 34.07 dBuV = Indicated Reading (23.85 dBuV) + Cable Factor (0.22 dB) + Attenuator Factor (10 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:

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

5.8 Summary of Test Results

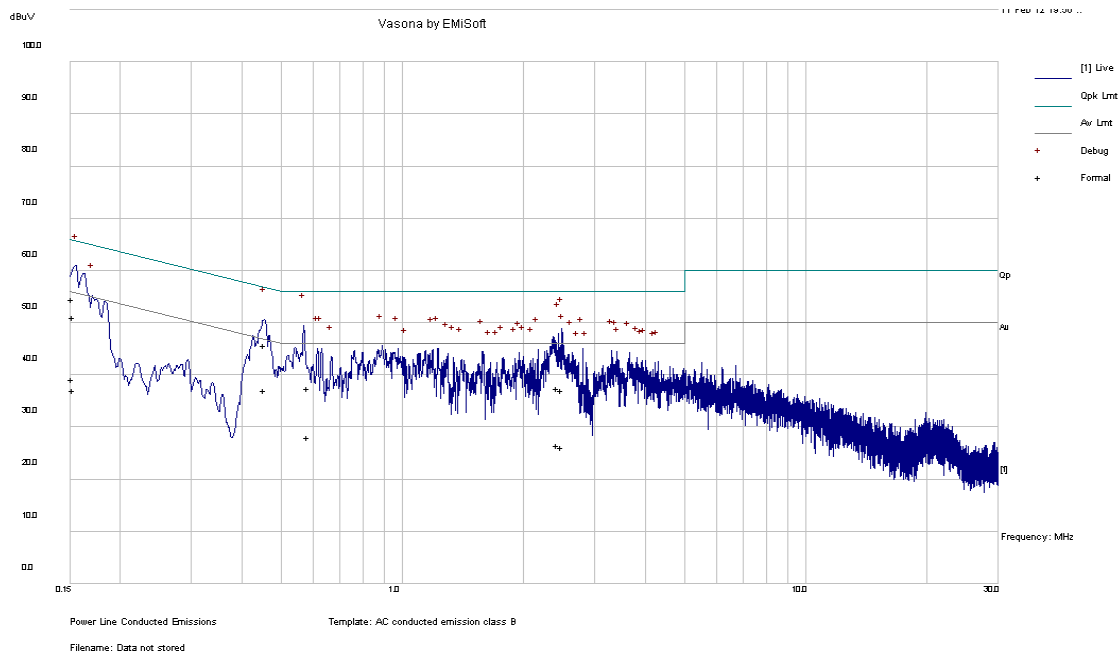
According to the recorded data in following table, the EUT complied with the FCC standard's conducted emissions limits, with the margin reading of:

Connection: AC/DC adapter connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-9.71	0.455186	Line	0.15 to 30

5.9 Conducted Emissions Test Plots and Data

Worst Case: QPSK, Middle channel

120V/60 Hz Line:

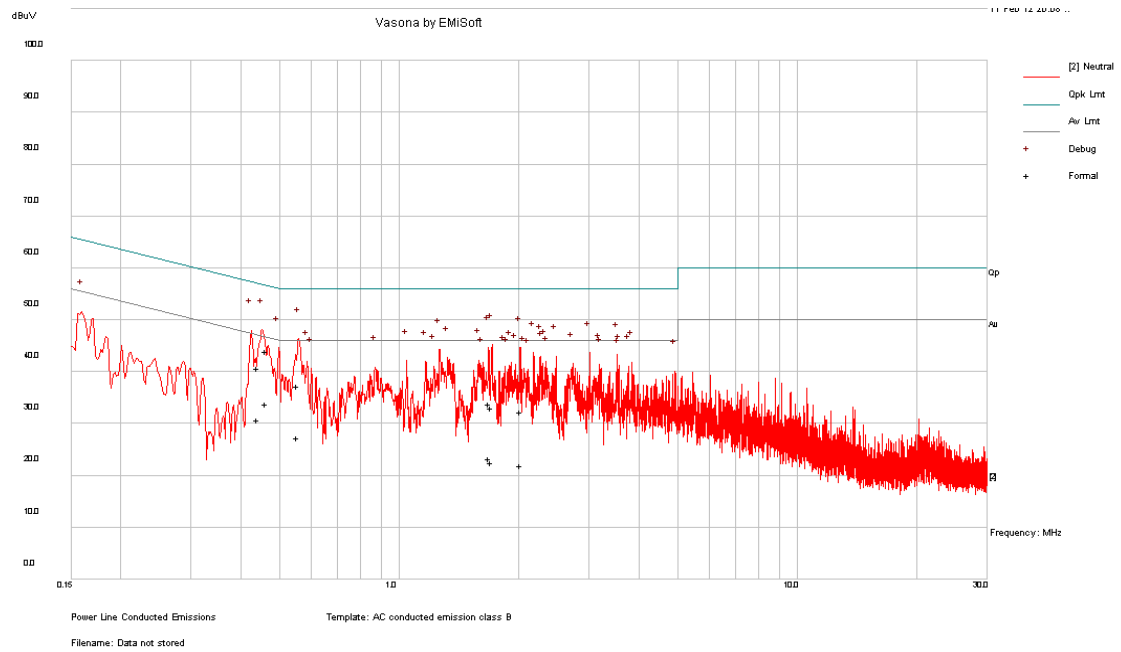


Quasi-Peak Measurement

Frequency (MHz)	Corrected Amplitude (dBuV)	Measurement Type	Conductor (L/N)	Limit (dBuV)	Margin (dB)
0.455186	45.77	Quasi-Peak	L	56.78	-11.01
0.152141	54.46	Quasi-Peak	L	65.88	-11.42
0.153205	51.10	Quasi-Peak	L	65.82	-14.73
0.584894	37.52	Quasi-Peak	L	56	-18.48
2.427149	37.47	Quasi-Peak	L	56	-18.53
2.482013	37.04	Quasi-Peak	L	56	-18.96

Average Measurement

Frequency (MHz)	Corrected Amplitude (dBuV)	Measurement Type	Conductor (L/N)	Limit (dBuV)	Margin (dB)
0.455186	37.07	Average	L	46.78	-9.71
0.152141	39.15	Average	L	55.88	-16.73
0.584894	28.10	Average	L	46	-17.90
0.153205	37.14	Average	L	55.82	-18.68
2.427149	26.53	Average	L	46	-19.47
2.482013	26.07	Average	L	46	-19.93

120V/60 Hz Neutral:**Quasi-Peak Measurement**

Frequency (MHz)	Corrected Amplitude (dBuV)	Measurement Type	Conductor (L/N)	Limit (dBuV)	Margin (dB)
0.463641	43.95	Quasi-Peak	N	56.63	-12.68
0.442049	40.70	Quasi-Peak	N	57.02	-16.32
0.556133	37.22	Quasi-Peak	N	56	-18.78
1.682855	33.82	Quasi-Peak	N	56	-22.18
1.704512	32.96	Quasi-Peak	N	56	-23.04
2.024975	32.24	Quasi-Peak	N	56	-23.76

Average Measurement

Frequency (MHz)	Corrected Amplitude (dBuV)	Measurement Type	Conductor (L/N)	Limit (dBuV)	Margin (dB)
0.463641	33.90	Average	N	46.63	-12.73
0.442049	30.69	Average	N	47.02	-16.33
0.556133	27.24	Average	N	46	-18.76
1.682855	23.24	Average	N	46	-22.76
1.704512	22.43	Average	N	46	-23.57
2.024975	21.95	Average	N	46	-24.05

6 FCC §15.205, §15.209, §15.247(d) – Spurious Radiated Emissions

6.1 Applicable Standard

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 §15.209(a) and RSS-210: 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 §15.205(a) 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	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

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)).

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.4-2003. The specification used was the FCC 15C 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 Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
A.H Systems	Antenna, Horn	SAS-200/571	261	2012-01-18
Mini-Circuits	Amplifier	ZVA-183-S	667400960	2011-05-08
Hewlett Packard	Pre amplifier	8447D	2944A10187	2011-03-08
Sunol Science Corp	Combination Antenna	JB1	A020106-1	2011-05-17
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100338	2011-09-14
Sunol Science Corp	System Controller	SC99V	122303-1	N/R
Agilent	PSA Series Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

6.4 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was 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 is set 3 meter away from the testing antenna, which is varied from 1-4 meter, and the EUT is placed on a turntable, which is 0.8 meter above ground plane, the table shall be rotated for 360 degrees to

find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000 MHz:

$$\text{RBW} = 100 \text{ kHz} / \text{VBW} = 300 \text{ kHz} / \text{Sweep} = \text{Auto}$$

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1MHz / VBW = 10Hz / Sweep = Auto

6.5 Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Cable Loss, and Attenuator Factor adding to the Indicated Reading. The basic equation is as follows:

$$\text{Corrected Amplitude} = \text{Indicated Reading} + \text{Cable Loss} + \text{Attenuator Factor}$$

For example, a Corrected Amplitude of 34.08 dBuV/m = Indicated Reading (23.85 dBuV) + Cable Factor (0.22 dB) + Attenuator Factor (10dB)

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:

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

6.6 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-11 in 5 meter chamber #2.

6.7 Summary of Test Results

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

30-1000 MHz:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Channel, Range
-25.67	31.25325	Vertical	Middle, 30MHz-1GHz

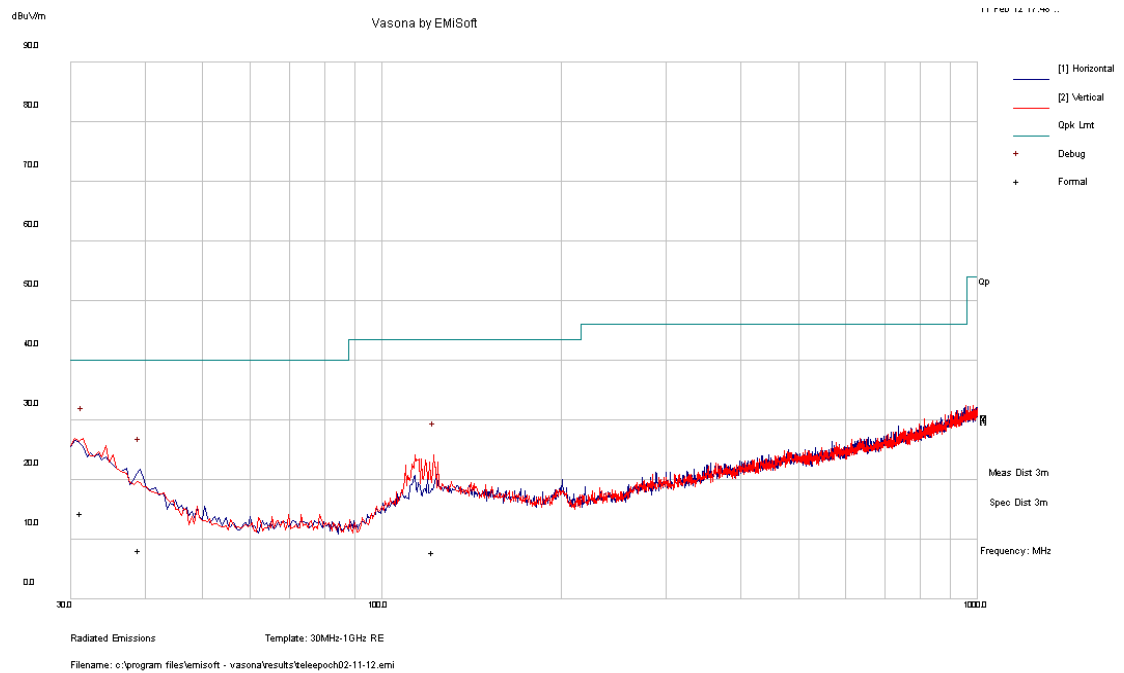
Above 1 GHz:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Channel, Range
-11.35	4804	Vertical	Low, 1-25 GHz
-10.95	4882	Vertical	Middle, 1-25 GHz
-11.17	4960	Vertical	High, 1-25 GHz

6.8 Radiated Emissions Test Result Data & Plots

1) 30 MHz – 1 GHz, Radiated Spurious Emissions Measured at 3 meters

Worst Case: QPSK, Middle channel



Quasi-Peak Measurement:

Frequency (MHz)	Corrected Amplitude (dB)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)
31.25325	14.33	321	V	81	40	-25.67
39.22325	8.19	379	H	21	40	-31.81
121.9795	7.87	258	V	360	43.5	-35.63

2) 1 – 25 GHz, Radiated Spurious Emissions Measured at 3 meters

Worst Modulation: QPSK

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
Low Channel (2402 MHz)											
4804	42.50	59	101	H	33.47	4.06	27.71	52.32	74	-21.68	Peak
4804	43.63	20	100	V	33.58	4.06	27.71	53.56	74	-20.44	Peak
4804	32.18	59	101	H	33.47	4.06	27.71	42.00	54	-12.00	Ave
4804	32.72	20	100	V	33.58	4.06	27.71	42.65	54	-11.35	Ave
Middle Channel (2441 MHz)											
4882	42.15	178	100	H	33.56	4.1	27.71	52.10	74	-21.90	Peak
4882	42.88	124	101	V	33.59	4.1	27.71	52.86	74	-21.14	Peak
4882	30.96	178	100	H	33.56	4.1	27.71	40.91	54	-13.09	Ave
4882	33.07	124	101	V	33.59	4.1	27.71	43.05	54	-10.95	Ave
High Channel (2480 MHz)											
4960	41.27	174	100	H	33.94	4.21	27.66	51.76	74	-22.24	Peak
4960	42.12	150	101	V	33.91	4.21	27.66	52.58	74	-21.42	Peak
4960	29.42	174	100	H	33.94	4.21	27.66	39.91	54	-14.09	Ave
4960	32.37	150	101	V	33.91	4.21	27.66	42.83	54	-11.17	Ave

3) Spurious Emissions in Restricted Band

Frequency (MHz)	S.A. Reading (dBμV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBμV/m)	FCC		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBμV/m)	Margin (dB)	
(Near Band Edge) Lowest Channel											
2344	26.35	58	100	H	27.73	2.87	0	56.95	74	-17.05	Peak
2357	26.18	114	100	V	28.52	2.87	0	57.57	74	-16.43	Peak
2344	12.54	58	100	H	27.73	2.87	0	43.14	54	-10.86	Ave
2357	12.53	114	100	V	28.52	2.87	0	43.92	54	-10.08	Ave
(Near Band Edge) Highest Channel											
2488	25.87	65	100	H	29.11	3.01	0	57.99	74	-16.01	Peak
2493	26.64	131	100	V	29.11	3.01	0	58.76	74	-15.24	Peak
2488	12.89	65	100	H	29.11	3.01	0	45.01	54	-8.99	Ave
2493	12.86	131	100	V	29.11	3.01	0	44.98	54	-9.02	Ave

7 FCC §15.247(a) – Hopping Channel Bandwidth

7.1 Applicable Standard

According to FCC§15.247(a) (l), the maximum 20 dB bandwidth of the hopping channel shall be presented.

7.2 Measurement 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 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 20 dB from the reference level. Record the frequency difference as the emissions bandwidth.
4. Repeat above procedures until all frequencies measured were complete.

7.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

7.4 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

7.5 Test Results

Modulation: GFSK

Channel	Frequency (MHz)	20 dB Channel Bandwidth (kHz)
Low	2402	1027.0
Mid	2441	989.7
High	2480	1007.0

Modulation: QPSK

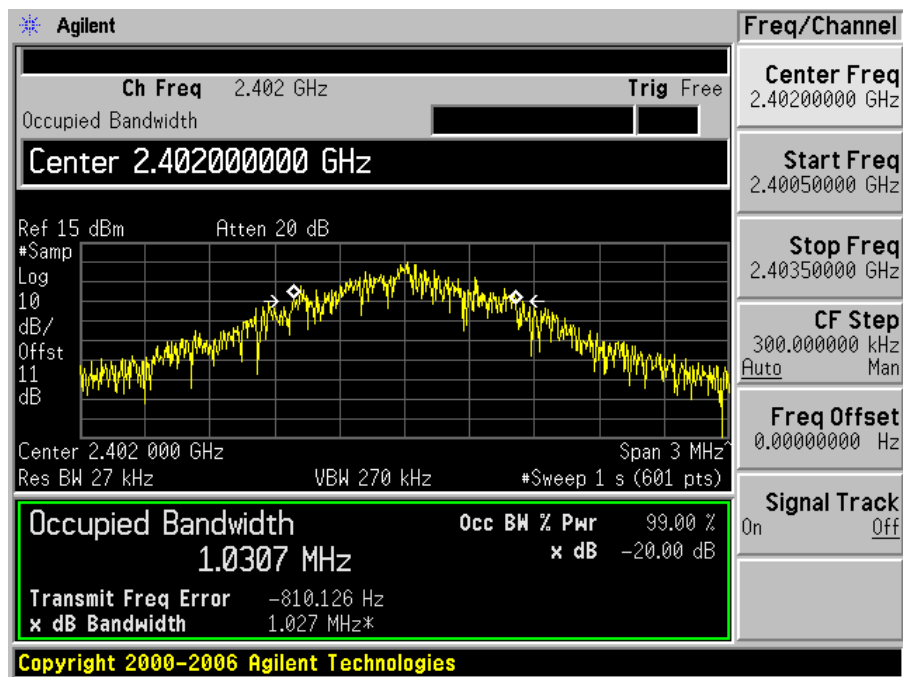
Channel	Frequency (MHz)	20 dB Channel Bandwidth (kHz)
Low	2402	1372
Mid	2441	1339
High	2480	1353

Modulation: 8PSK

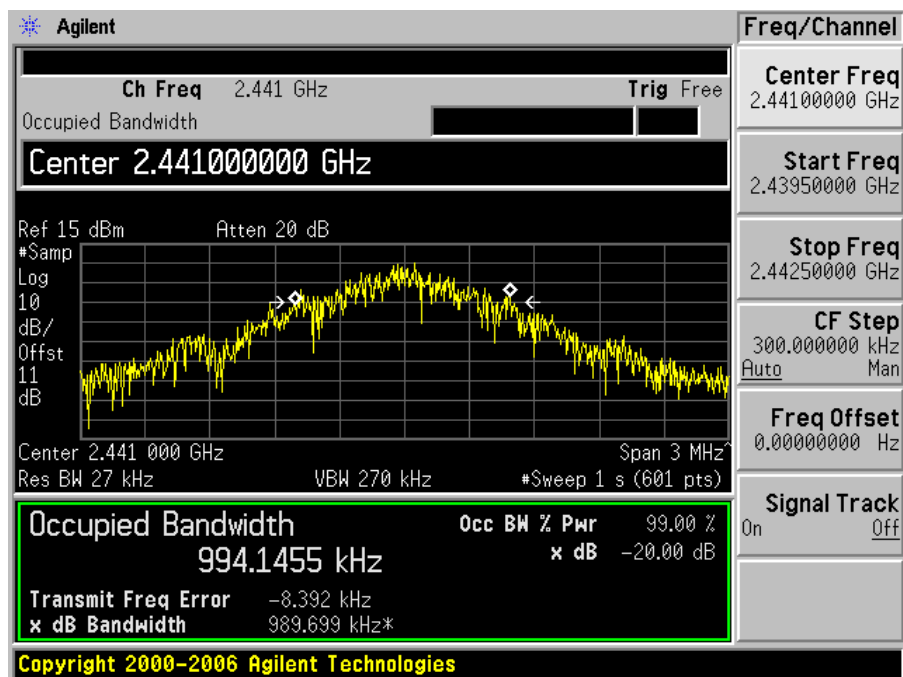
Channel	Frequency (MHz)	20 dB Channel Bandwidth (kHz)
Low	2402	1314
Mid	2441	1316
High	2480	1297

Please refer to the following plots.

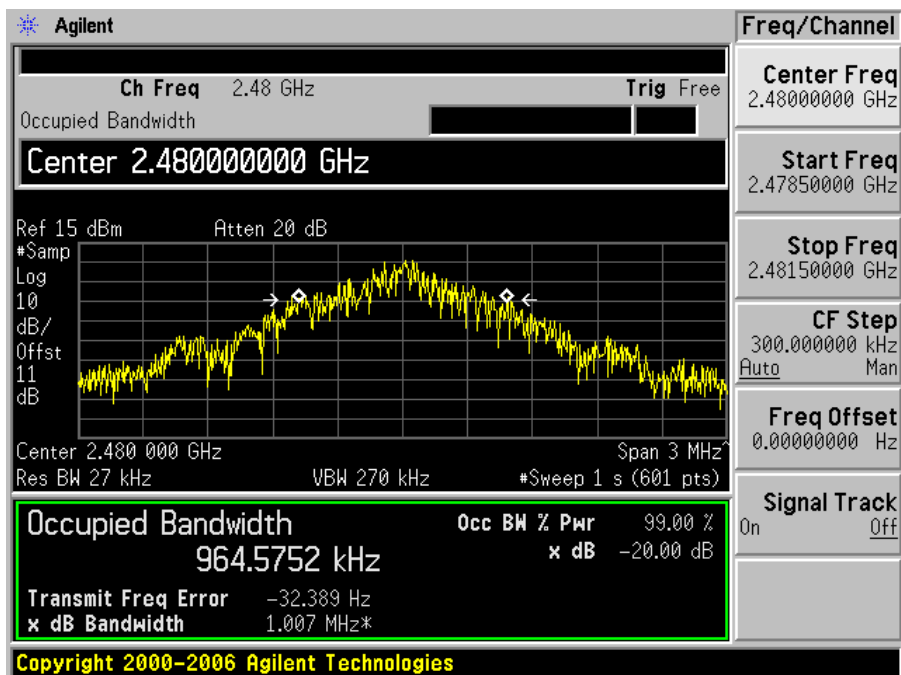
GFSK - Low Channel



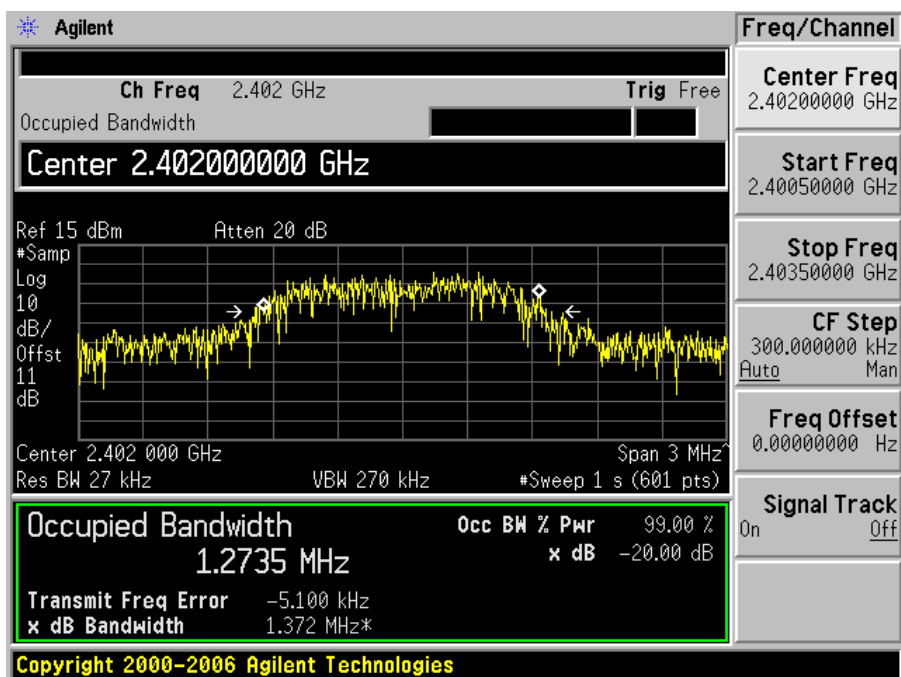
GFSK - Middle Channel



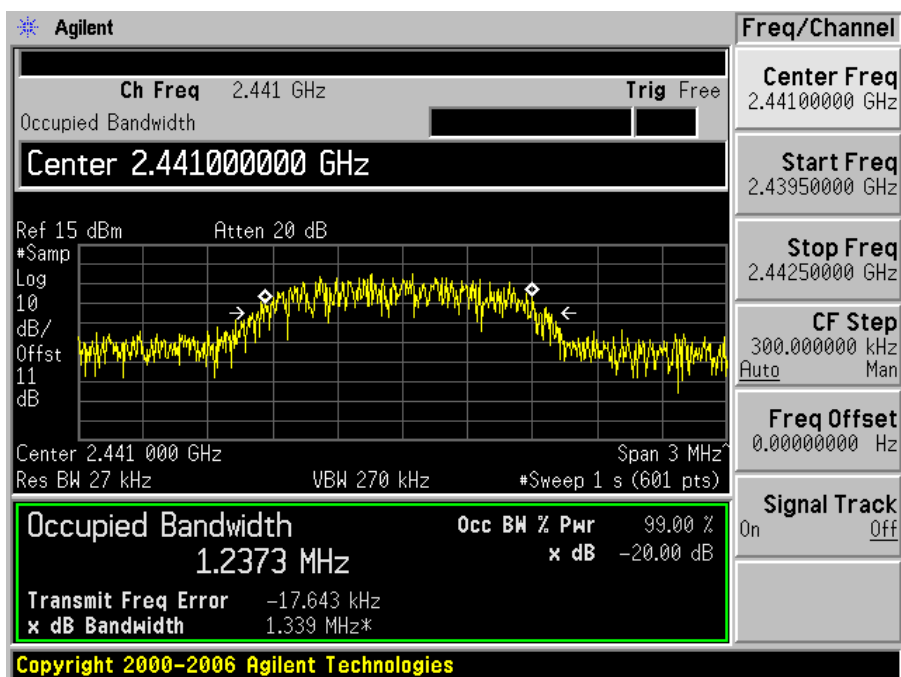
GFSK - High Channel



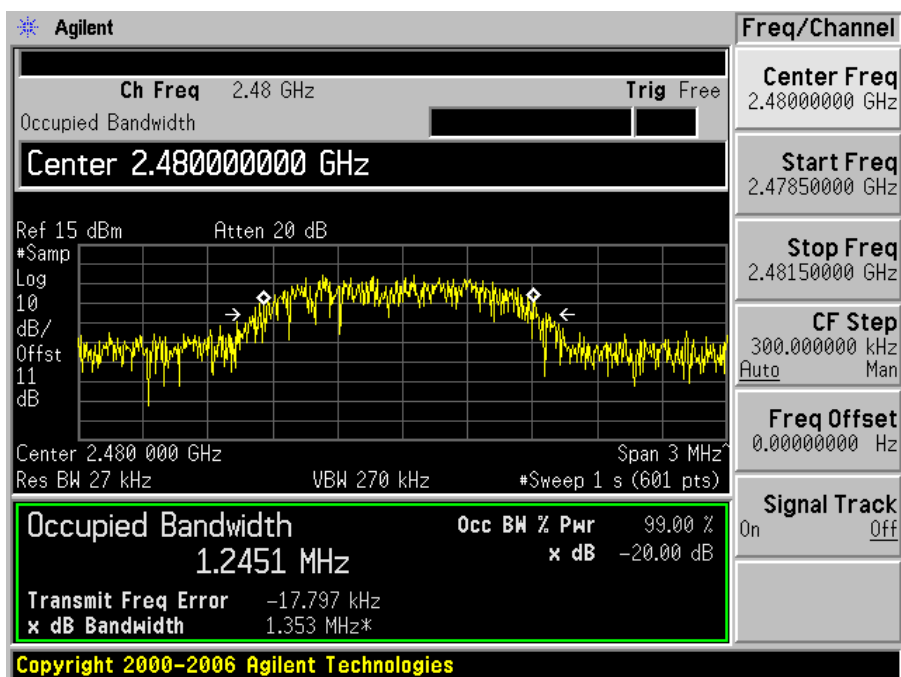
QPSK - Low Channel



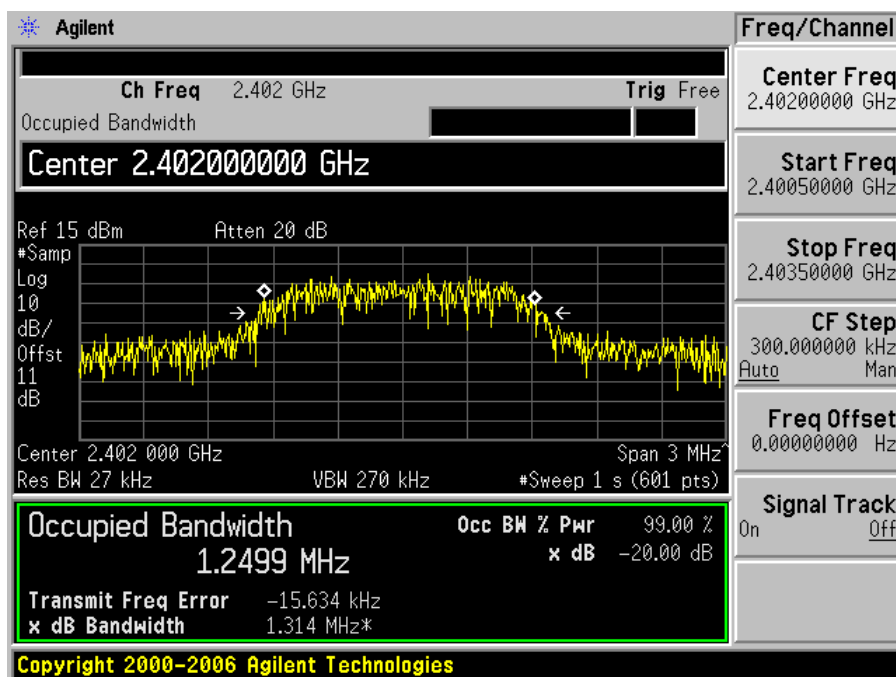
QPSK - Middle Channel



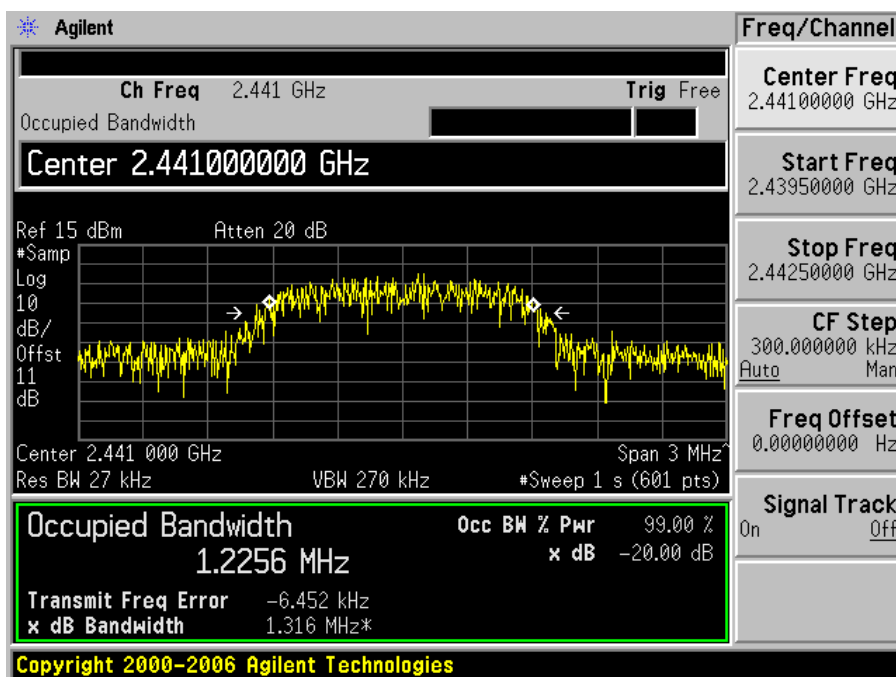
QPSK - High Channel



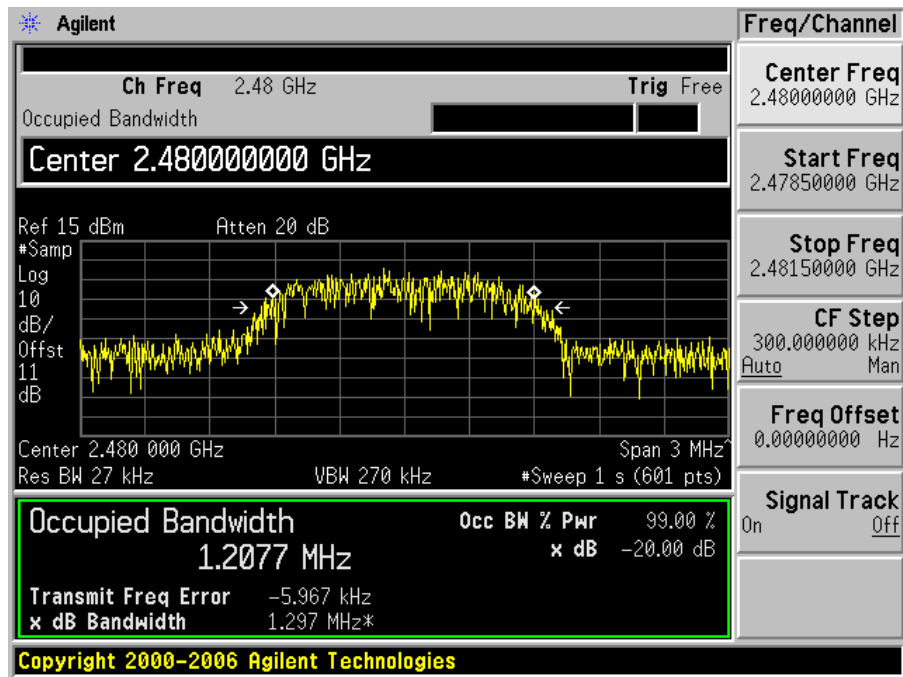
8PSK - Low Channel



8PSK - Middle Channel



8PSK - High Channel



8 FCC §15.247(a) – Hopping Channel Separation

8.1 Applicable Standard

According to FCC §15.247(a)(1): Frequency hopping systems shall have hopping channel carrier frequencies separated by a minimum of 25 kHz or the 20 dB bandwidth of the hopping channel, whichever is greater. Alternatively, frequency hopping systems operating in the 2400–2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, whichever is greater, provided the systems operate with an output power no greater than 125 mW. The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

8.2 Measurement Procedure

1. Check the calibration of the measuring instrument (SA) using either an internal calibrator or a known signal from an external generator.
2. Position the EUT on a bench without connection to measurement instrument Turn on the EUT and set it to any one convenient frequency within its operating range.
3. By using the Max-Hold function record the separation of two adjacent channels.
4. Measure the frequency difference of these two adjacent channels by SA MARK function, and then plot the result on SA screen.
5. Repeat above procedures until all frequencies measured were complete.

8.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

8.4 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

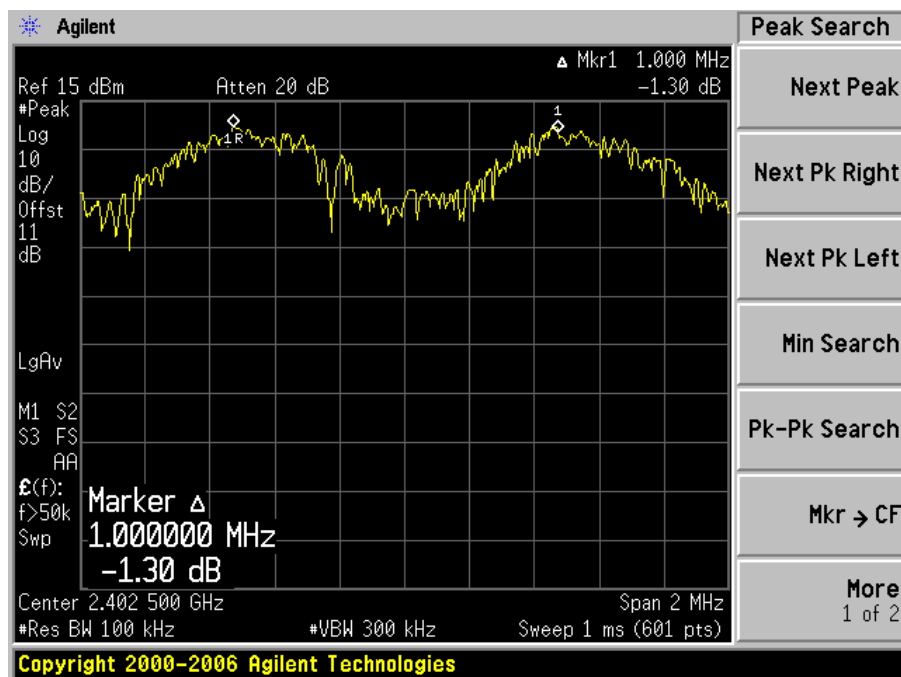
The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

8.5 Test Results

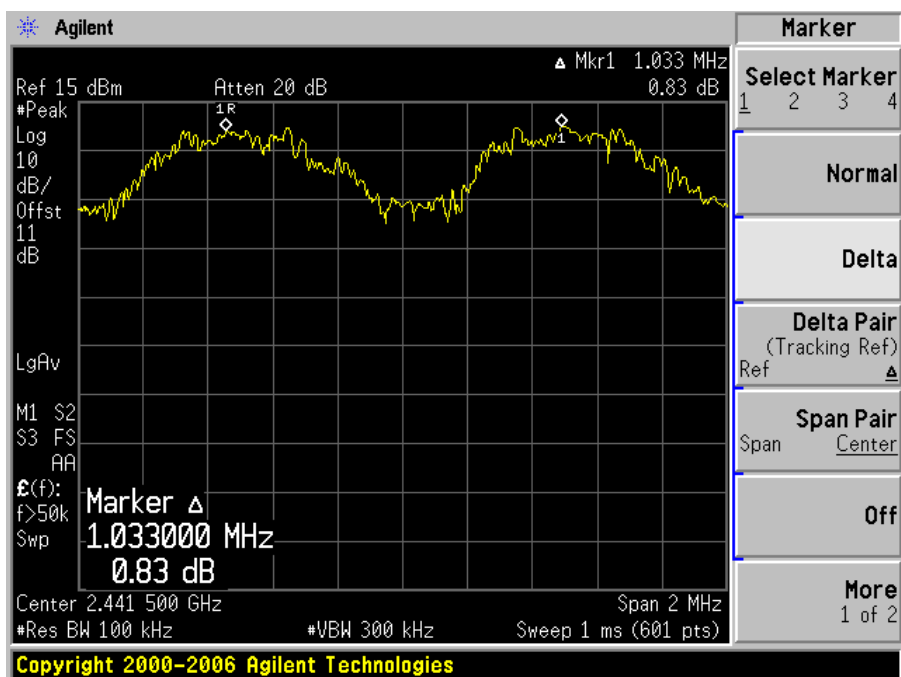
Channel	Frequency (MHz)	Channel Separation (kHz)	GFSK Limit > 2/3 20 dB BW >(kHz)	QPSK Limit > 2/3 20 dB BW >(kHz)	8PSK Limit > 2/3 20 dB BW >(kHz)
Low	2402	1000	685	915	876
Mid	2441	1033	660	893	877
High	2480	1003	671	902	865

Please refer to the following plots.

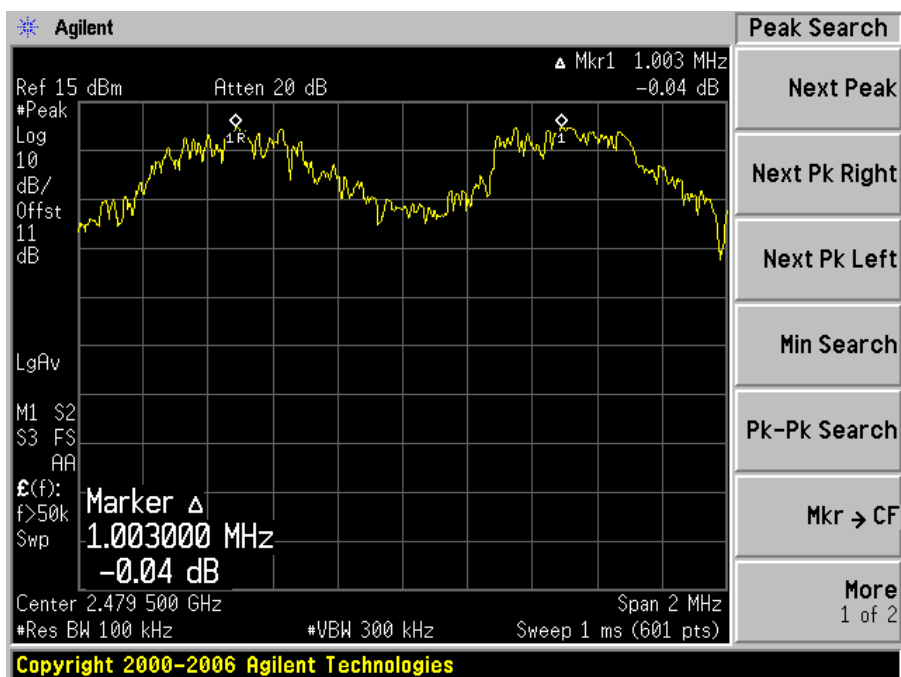
Low Channel



Middle Channel



High Channel



9 FCC §15.247(a) - Number of Hopping Channels

9.1 Applicable Standard

According to FCC §15.247(a)(1)(iii), frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 channels.

9.2 Measurement Procedure

1. Check the calibration of the measuring instrument (SA) using either an internal calibrator or a known signal from an external generator.
2. Position the EUT on the bench without connection to measurement instrument. Turn on the EUT and set it to any one measured frequency within its operating range, and make sure the instrument is operated in its linear range.
3. Set the SA on Max-Hold Mode, and then keep the EUT in hopping mode. Record all the signals from each channel until each one has been recorded.
4. Set the SA on View mode and then plot the result on SA screen.
5. Repeat above procedures until all frequencies measured were complete.

9.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

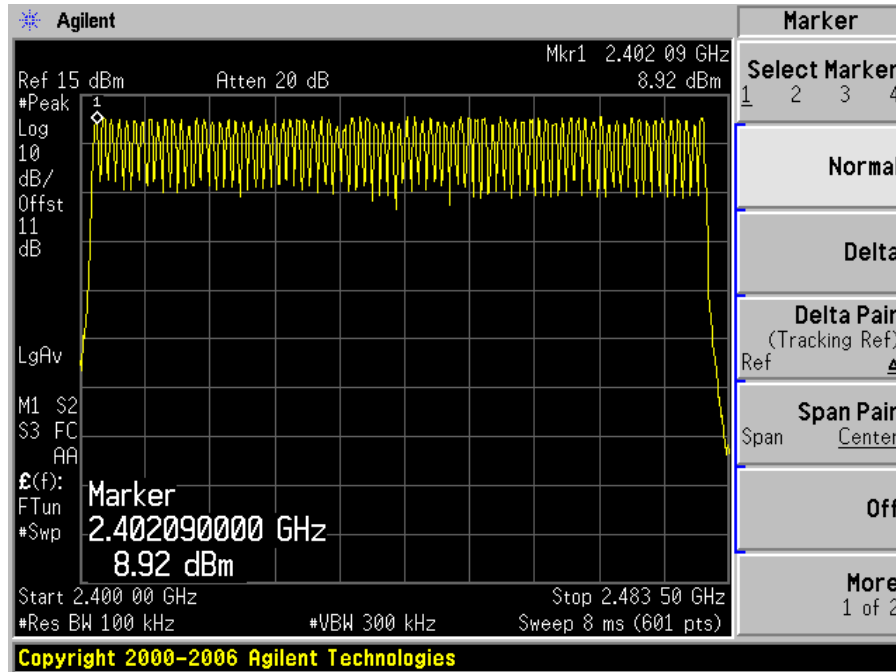
9.4 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

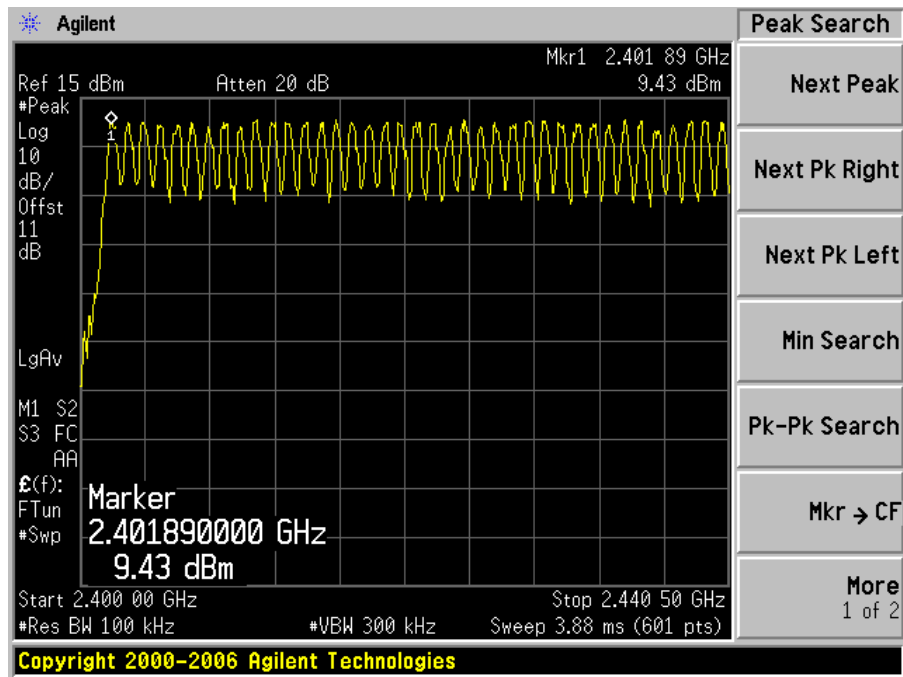
The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

9.5 Test Results

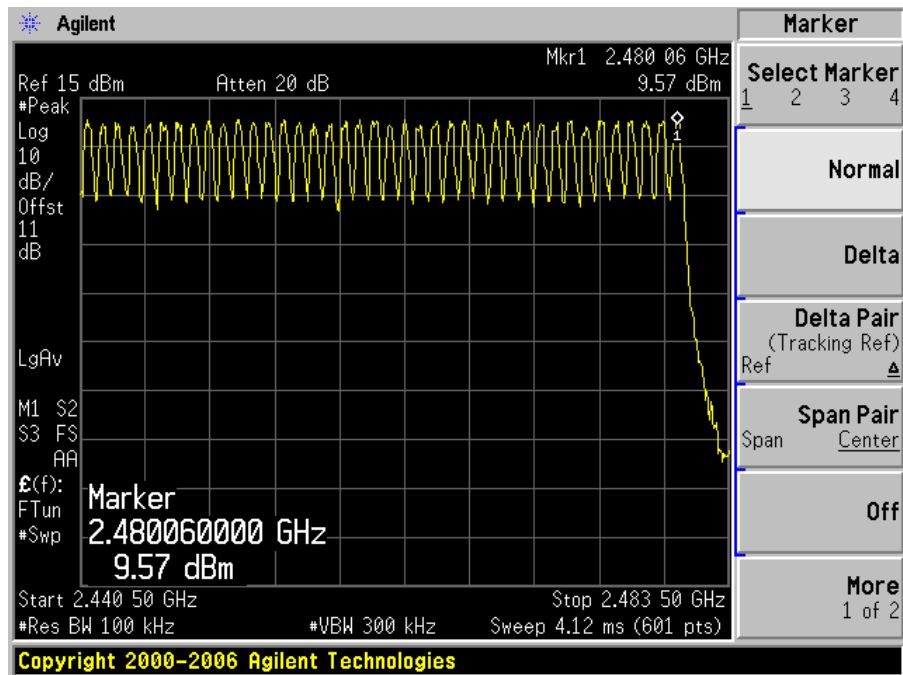
Hopping Channel Number: Total 79 Channels



39 Channels between 2400 to 2440.5 MHz



40 Channels between 2440.5 to 2483.5 MHz



10 FCC §15.247(a) - Dwell Time

10.1 Applicable Standard

According to FCC §15.247 (a)(1)(iii), the average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed.

10.2 Measurement 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 was set 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. Adjust the center frequency of SA on any frequency be measured and set SA to zero span mode. And then, set RBW and VBW of spectrum analyzer to proper value.
4. Measure the time duration of one transmission on the measured frequency. And then plot the result with time difference of this time duration.
5. Repeat above procedures until all frequencies measured were complete.

10.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

10.4 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

10.5 Test Results

DH1: Packet Size = 27 bytes

Channel	Pulse Width (ms)	Dwell time (sec)	Limit (sec)	Results
Low	0.410	0.131	0.4	Pass
Mid	0.410	0.131	0.4	Pass
High	0.410	0.131	0.4	Pass

Note: Dwell time = Pulse time*(1600/2/79)*31.6S

DH3: Packet Size = 183 bytes

Channel	Pulse Width (ms)	Dwell time (sec)	Limit (sec)	Results
Low	1.665	0.266	0.4	Pass
Mid	1.665	0.266	0.4	Pass
High	1.665	0.266	0.4	Pass

Note: Dwell time = Pulse time*(1600/4/79)*31.6S

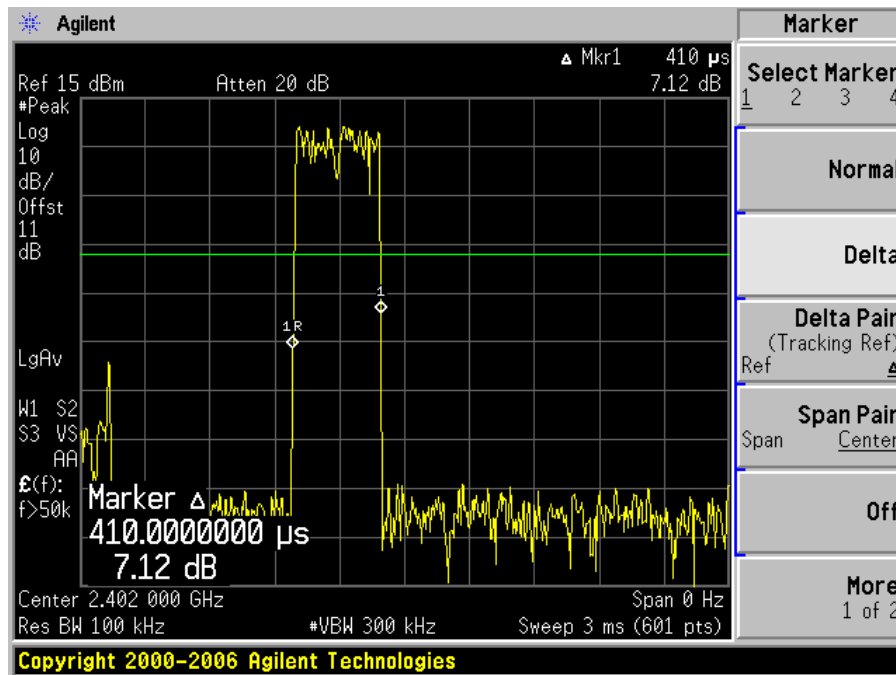
DH5: Packet Size = 339 bytes

Channel	Pulse Width (ms)	Dwell time (sec)	Limit (sec)	Results
Low	2.909	0.310	0.4	Pass
Mid	2.909	0.310	0.4	Pass
High	2.909	0.310	0.4	Pass

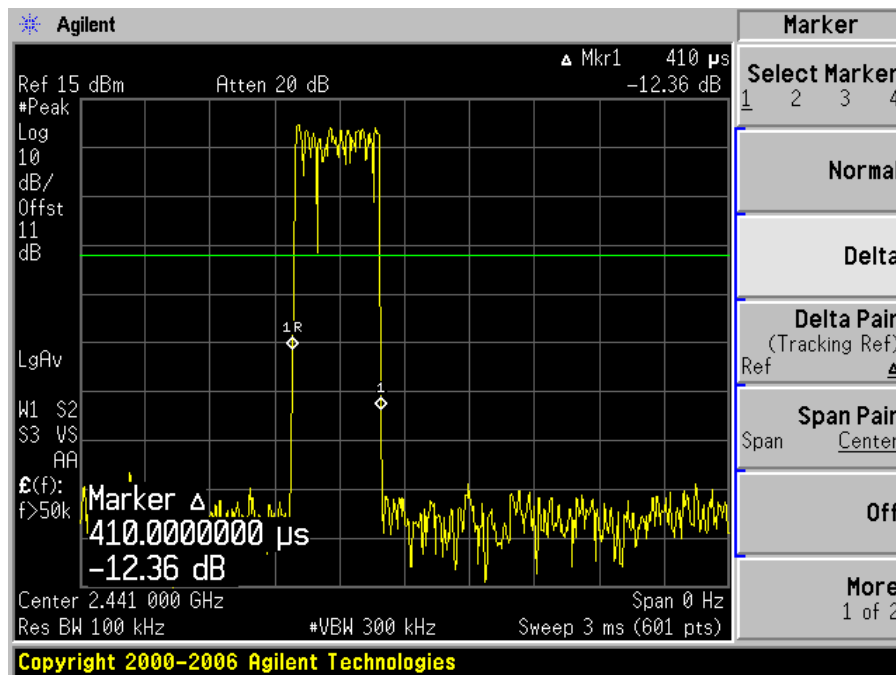
Note: Dwell time = Pulse time*(1600/6/79)*31.6S

Please refer to following plots:

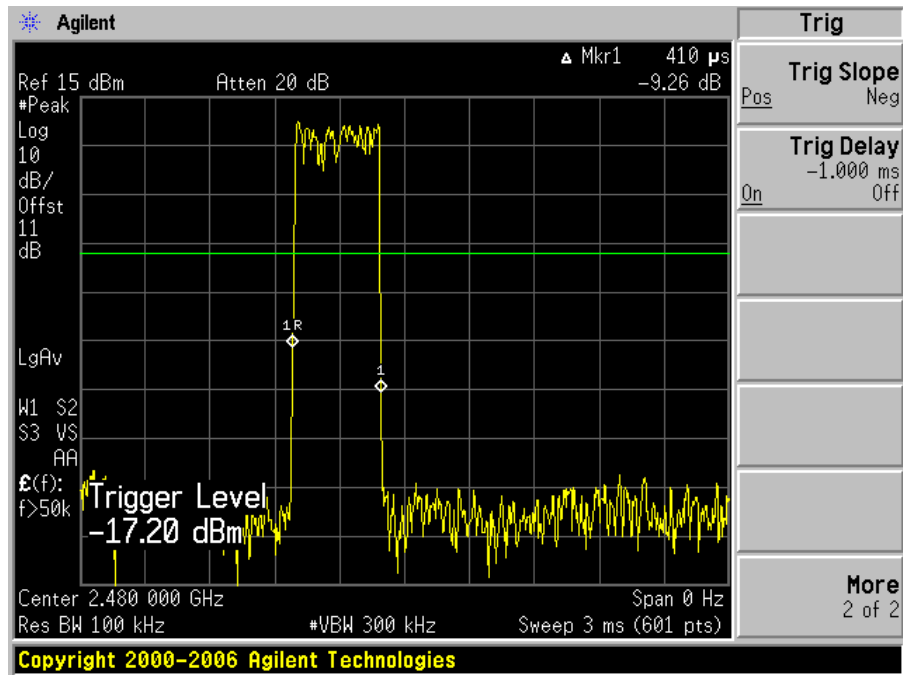
DH1 - Low Channel



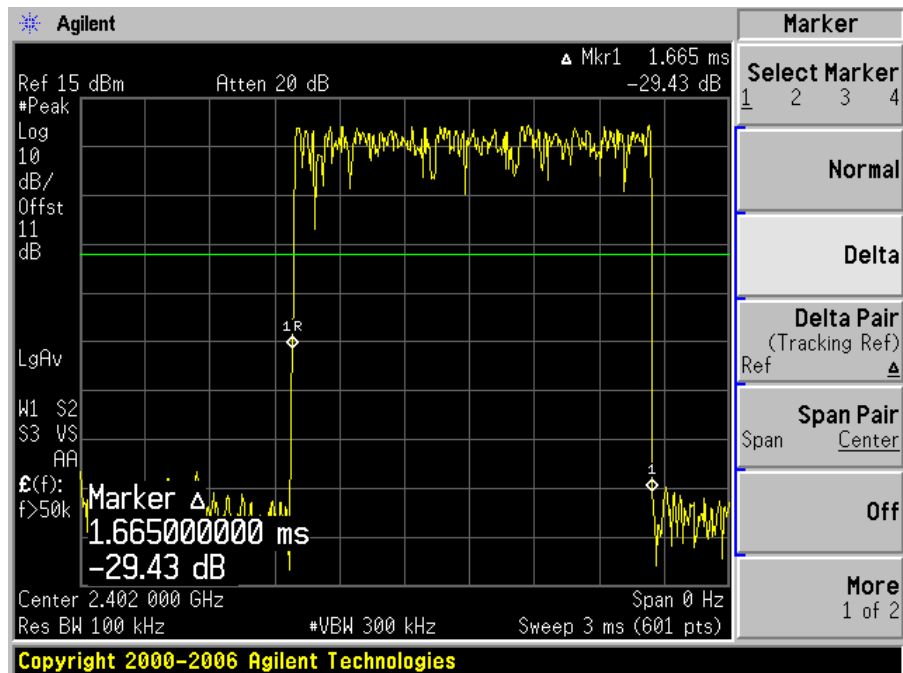
DH1 - Middle Channel



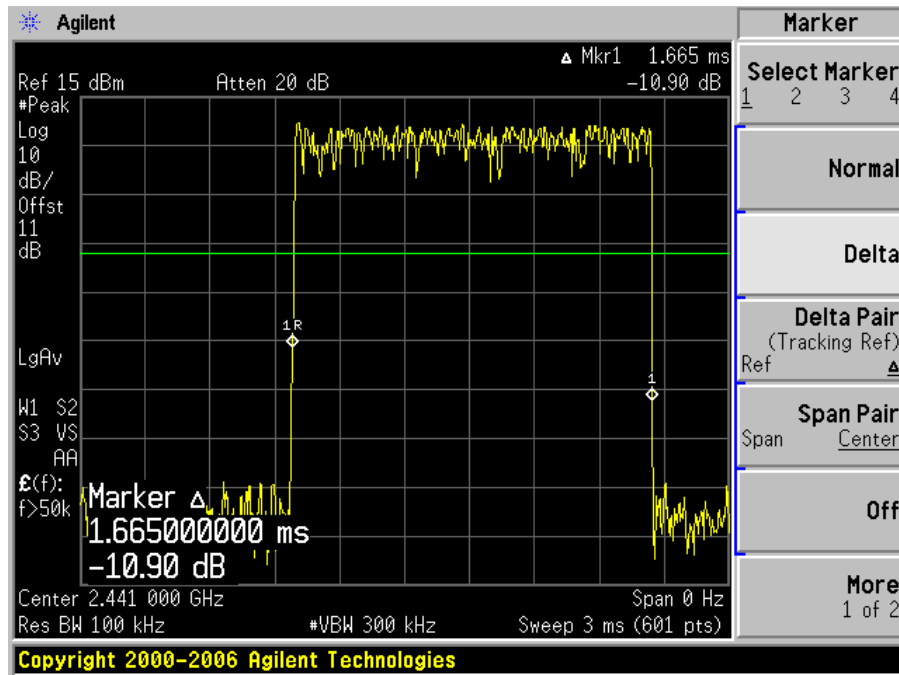
DH1 - High Channel



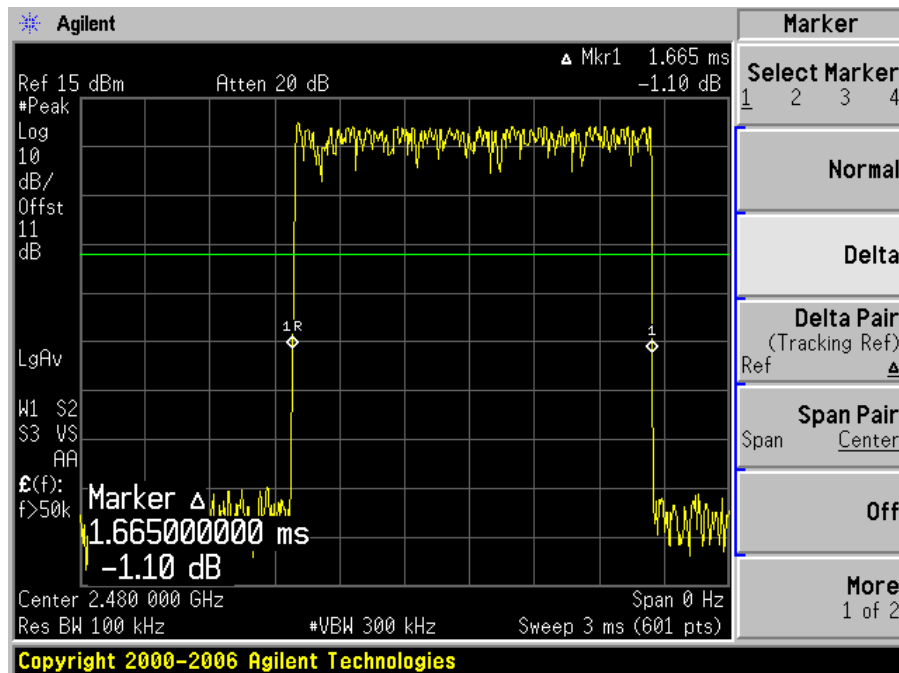
DH3 - Low Channel



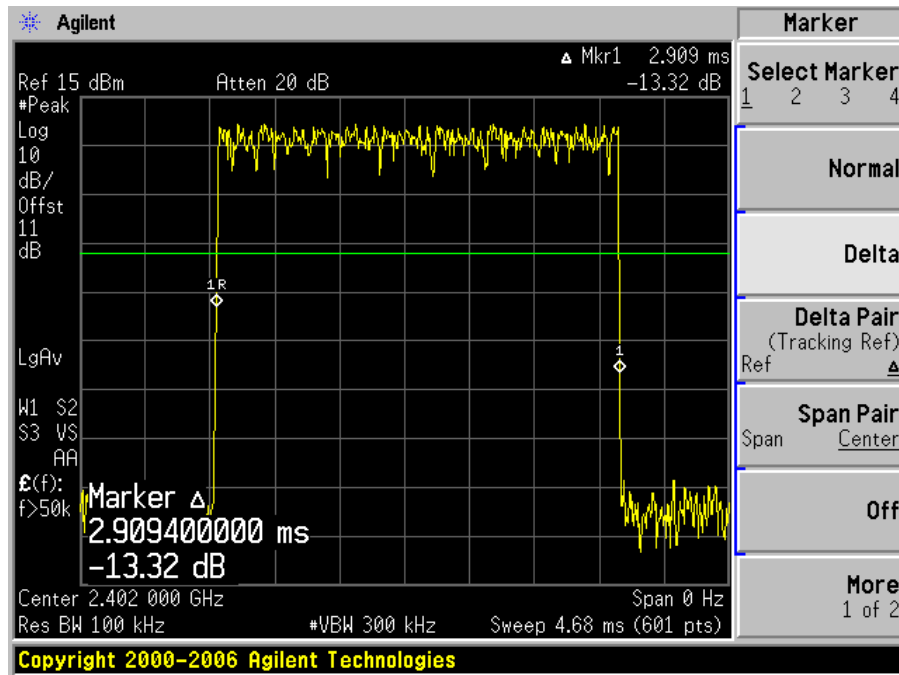
DH3 - Middle Channel



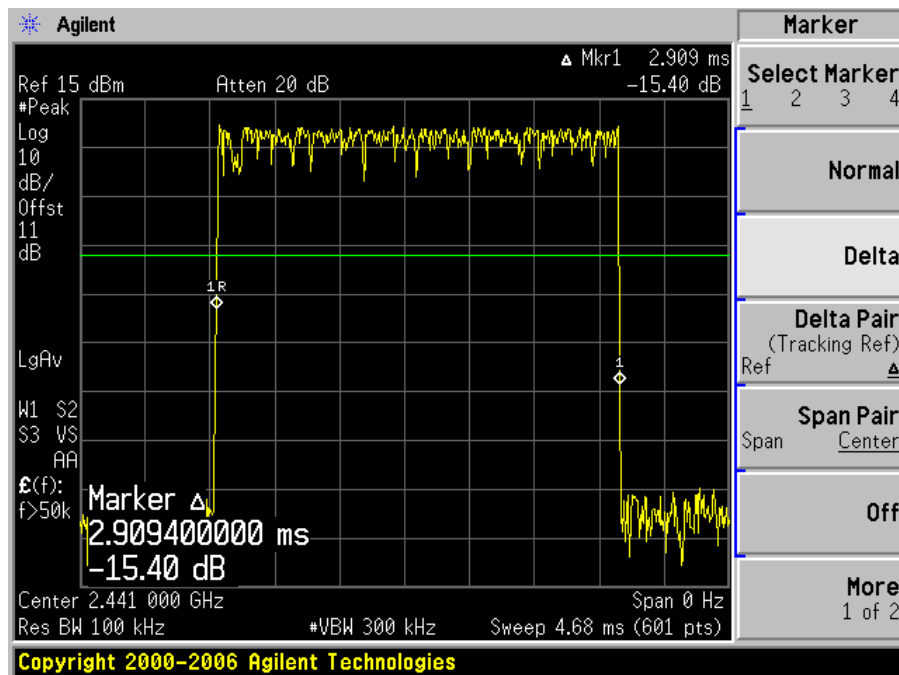
DH3 - High Channel



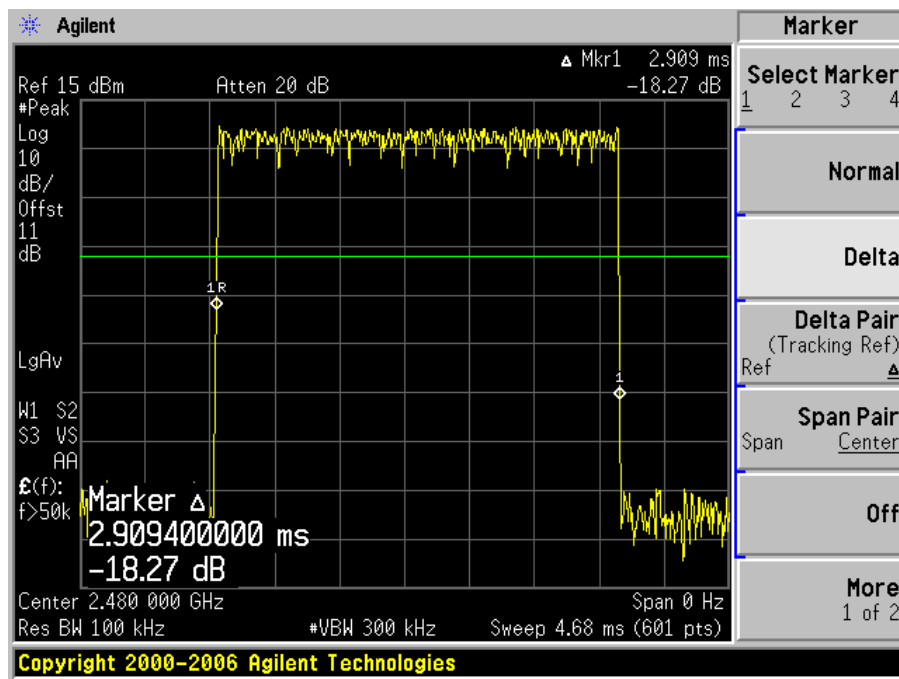
DH5 - Low Channel



DH5 - Middle Channel



DH5 - High Channel



11 FCC §15.247(b) – Maximum Peak Output Power

11.1 Applicable Standard

According to FCC §15.247(b) (1), for frequency hopping systems in the 2400-2483.5MHz band employing at least 75 hopping channels, and all direct sequence systems, the maximum peak output power of the transmitter shall not exceed 1 Watt. For all other frequency hopping system in the 2400 – 2483.5 MHz band, the maximum peak output power of the transmitter shall not exceed 0.125 Watt.

11.2 Measurement Procedure

1. Place the EUT on the turntable 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 the spectrum analyzer.

11.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

11.4 Test Environmental Conditions

Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

11.5 Test Results

Modulation GFSK:

Channel	Frequency (MHz)	Max Peak Output Power		Limit (mw)	Result
		(dBm)	(mw)		
Low	2402	10.20	10.47	125	Pass
Mid	2441	10.21	10.50	125	Pass
High	2480	10.16	10.38	125	Pass

Modulation QPSK:

Channel	Frequency (MHz)	Max Peak Output Power		Limit (mw)	Result
		(dBm)	(mw)		
Low	2402	10.48	11.17	125	Pass
Mid	2441	10.65	11.61	125	Pass
High	2480	10.63	11.56	125	Pass

Modulation 8PSK:

Channel	Frequency (MHz)	Max Peak Output Power		Limit (mw)	Result
		(dBm)	(mw)		
Low	2402	10.00	10.00	125	Pass
Mid	2441	10.23	10.54	125	Pass
High	2480	10.01	10.02	125	Pass

12 FCC §15.247(d) - Band Edges Emissions

12.1 Applicable Standard

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency band 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. Attenuation below the general limits specified in §15.209(a) is not required.

12.2 Measurement 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 set it to any one measured frequency within its operating range, and make sure the instrument is operated in its linear range.
3. Set both RBW and VBW of spectrum analyzer to 100 kHz with a convenient frequency span including 100kHz 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.

12.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

12.4 Test Environmental Conditions

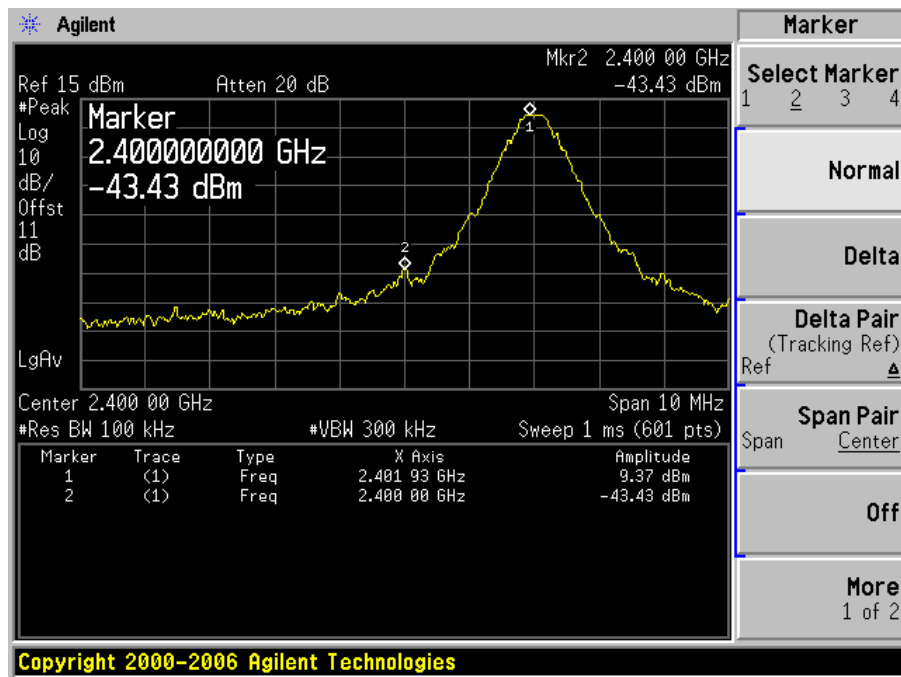
Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

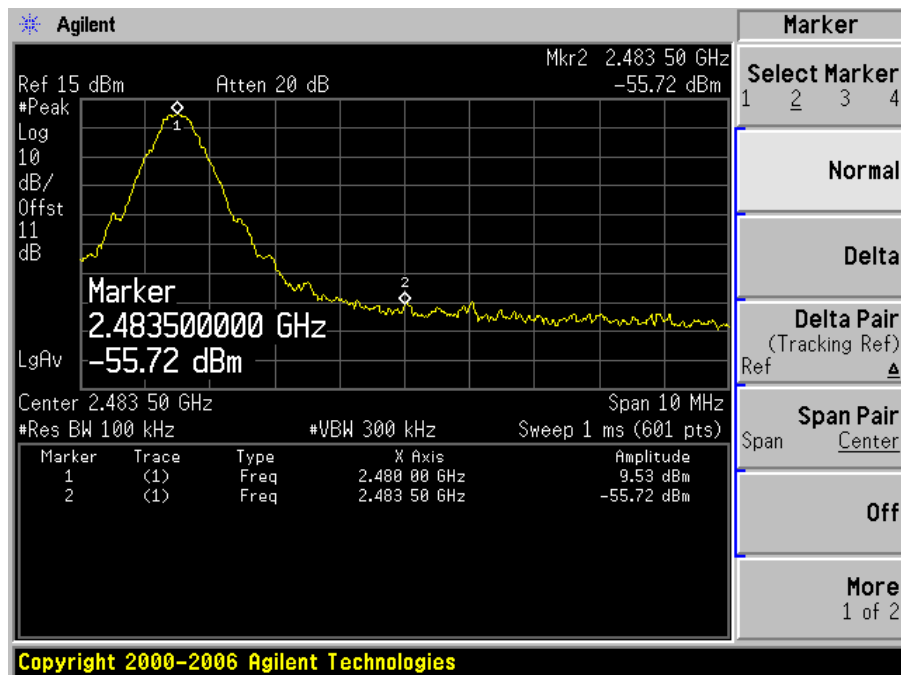
12.5 Test Results

Please refer to the following plots.

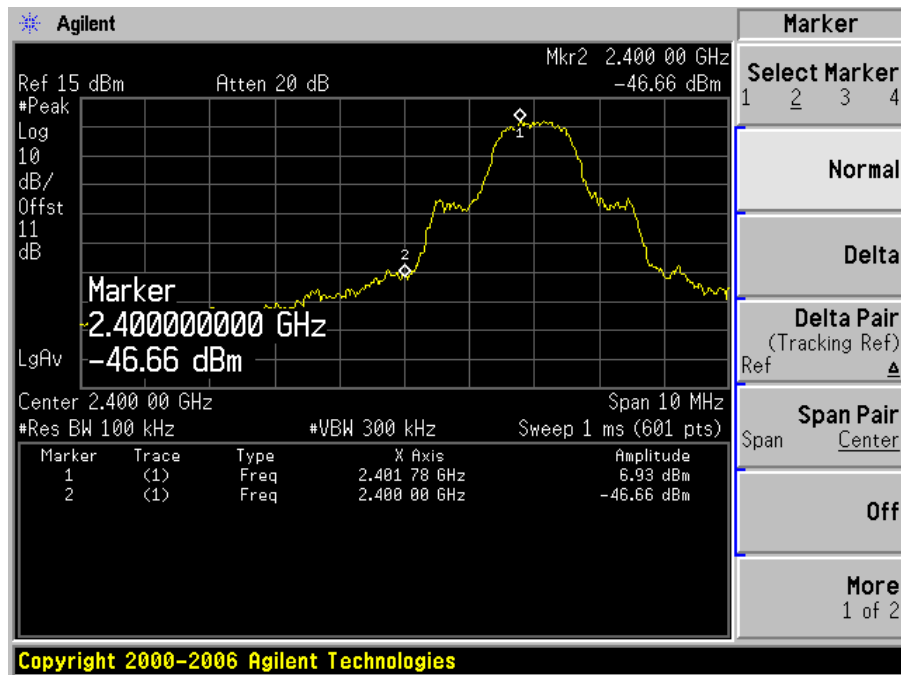
Band Edge: Lowest Channel GFSK



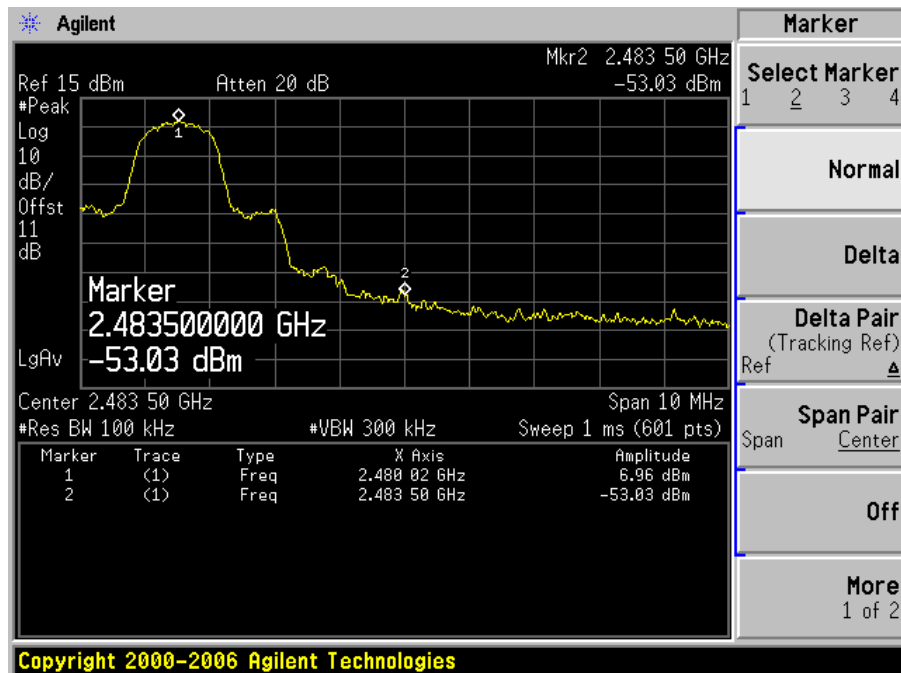
Band Edge: Highest Channel GFSK



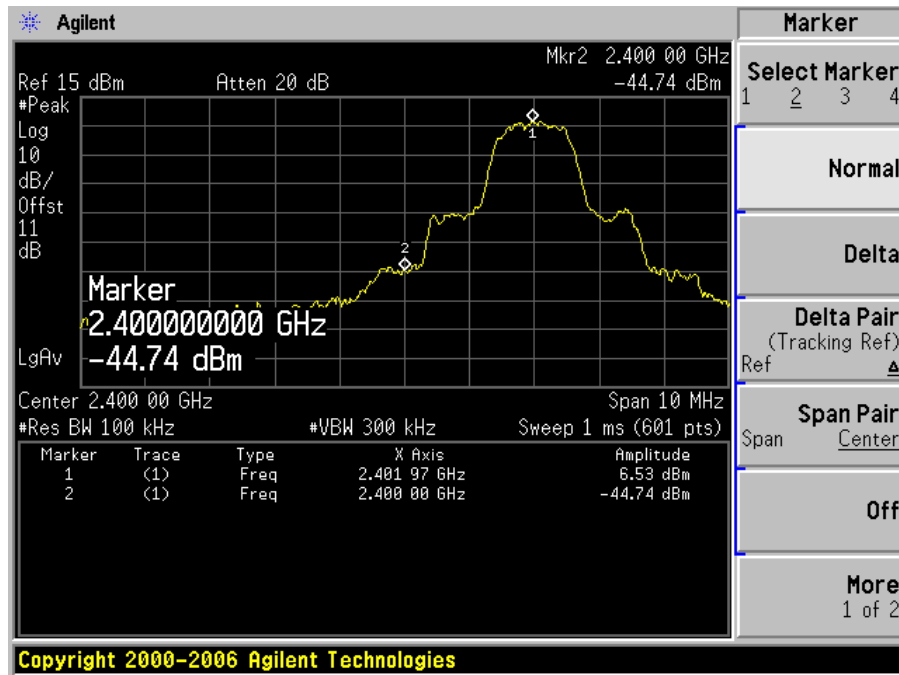
Band Edge: Lowest Channel QPSK



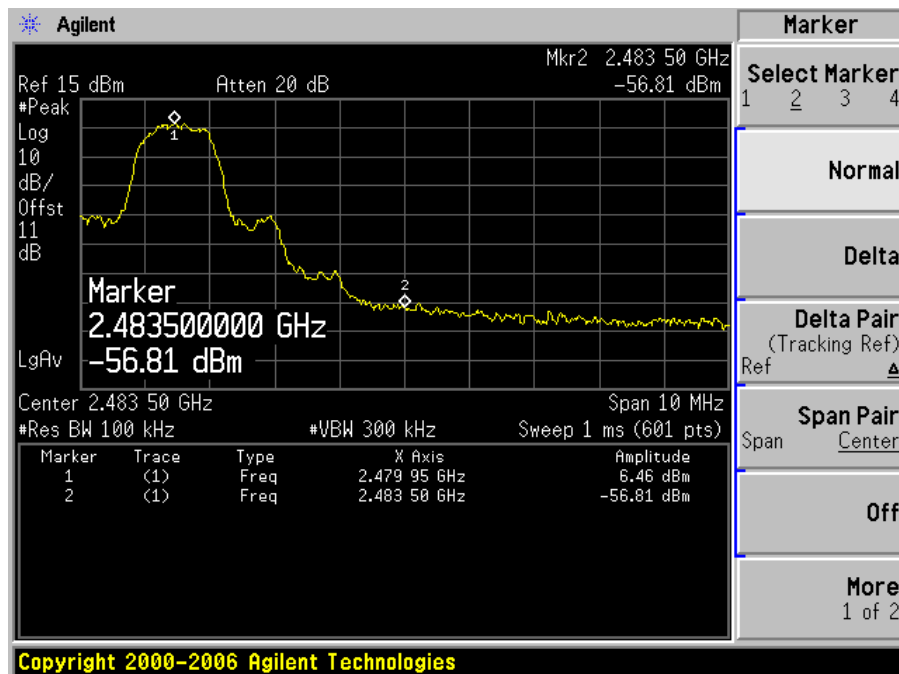
Band Edge: Highest Channel QPSK



Band Edge: Lowest Channel 8PSK



Band Edge: Highest Channel 8PSK



13 FCC §15.247(d) - Spurious Emissions at Antenna Terminals

13.1 Applicable Standard

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.

13.2 Measurement Procedure

1. Check the calibration of the measuring instrument (SA) using either an internal calibrator or a known signal from an external generator.
2. Position the EUT on a bench 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 the SA on Max-Hold Mode, and then keep the EUT in transmitting mode. Record all the signals from each channel until each one has been recorded.
4. Set the SA on View mode and then plot the result on SA screen.
5. Repeat above procedures until all frequencies measured were complete.

13.3 Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the NVLAP requirements, traceable to the NIST.

13.4 Test Environmental Conditions

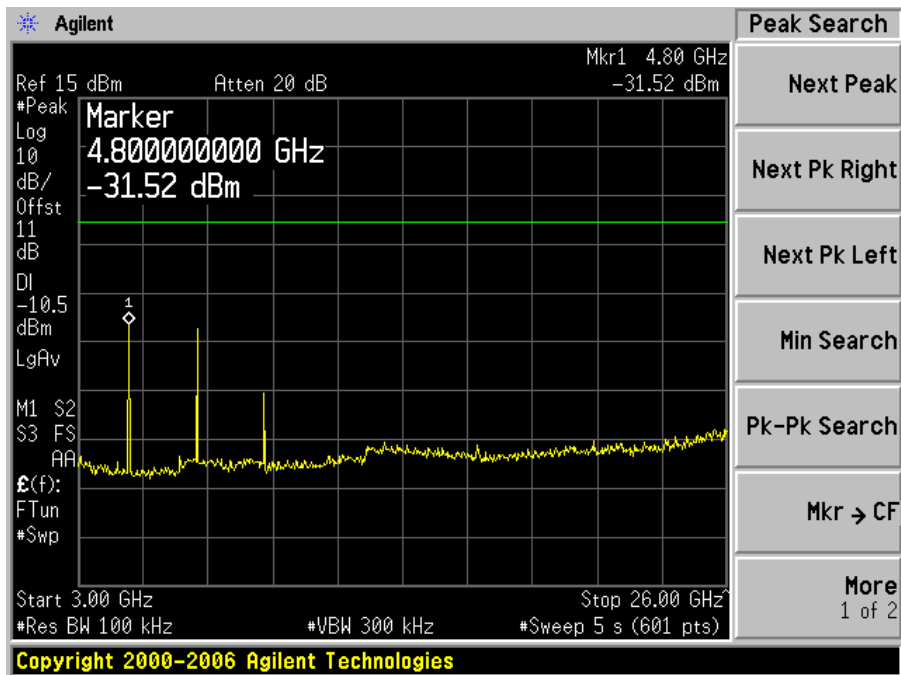
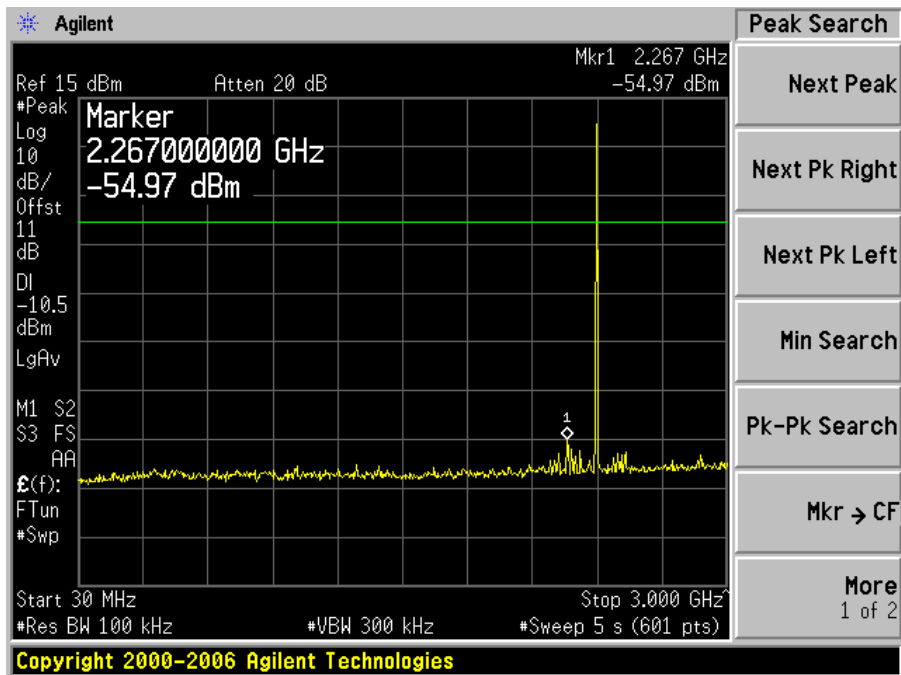
Temperature:	20-24 °C
Relative Humidity:	32-35 %
ATM Pressure:	101.4-101.6kPa

The testing was performed by Quinn Jiang on 2012-02-06 to 2012-02-09 at RF test site.

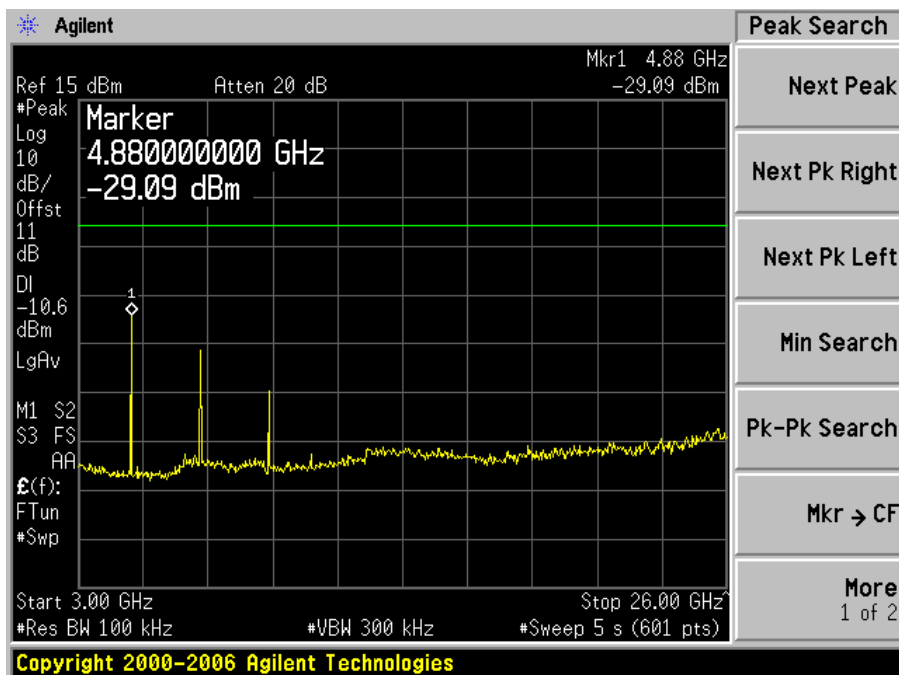
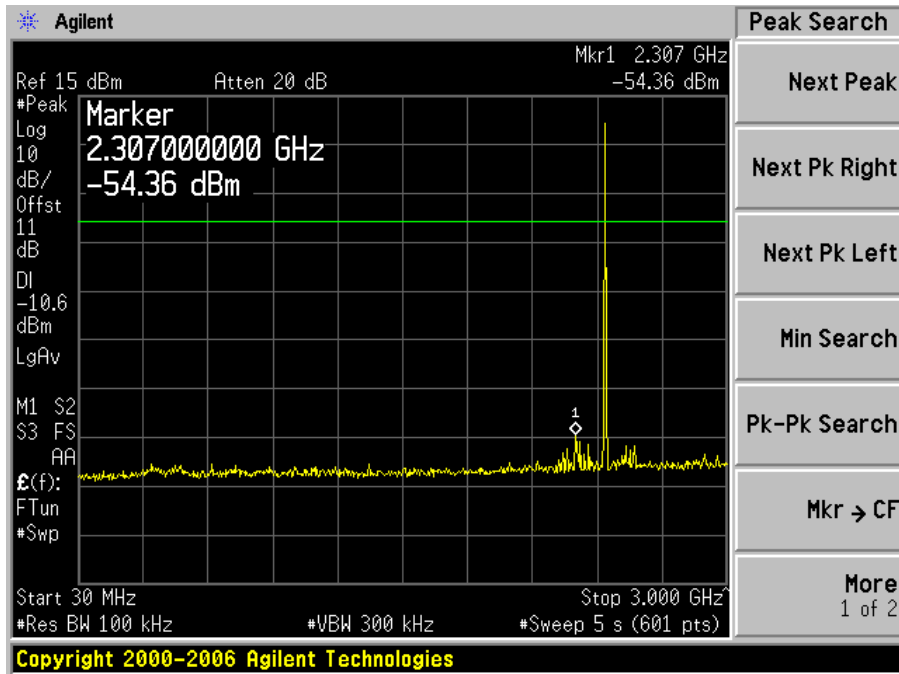
13.5 Test Results

Please refer to the following plots.

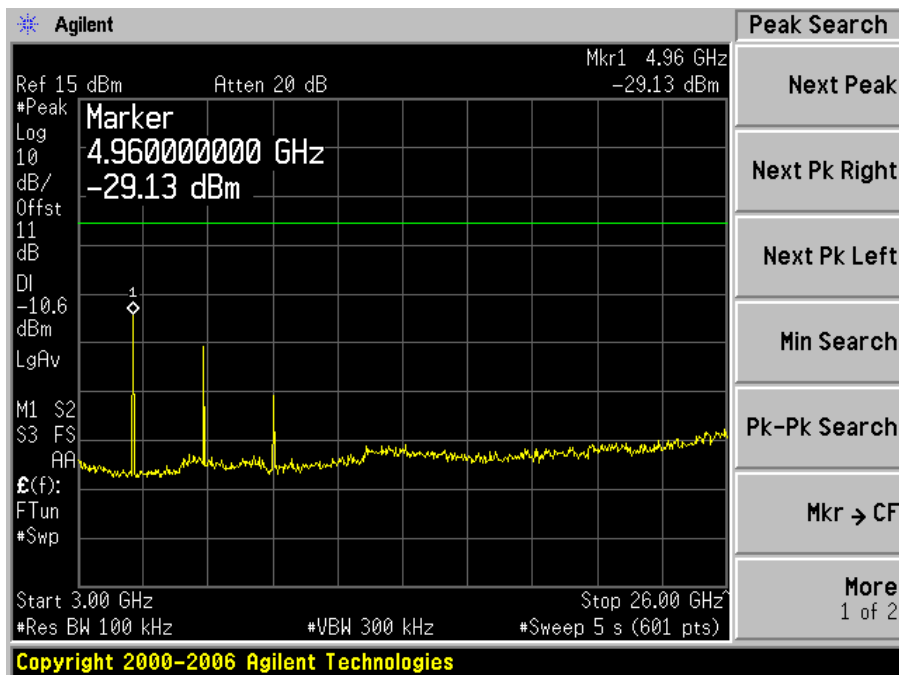
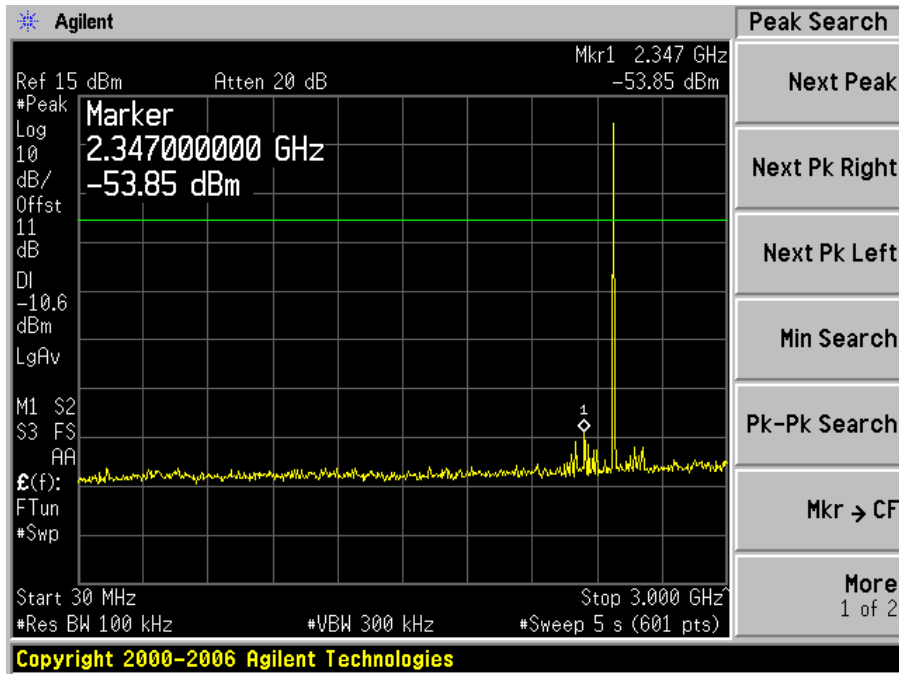
Low Channel GFSK



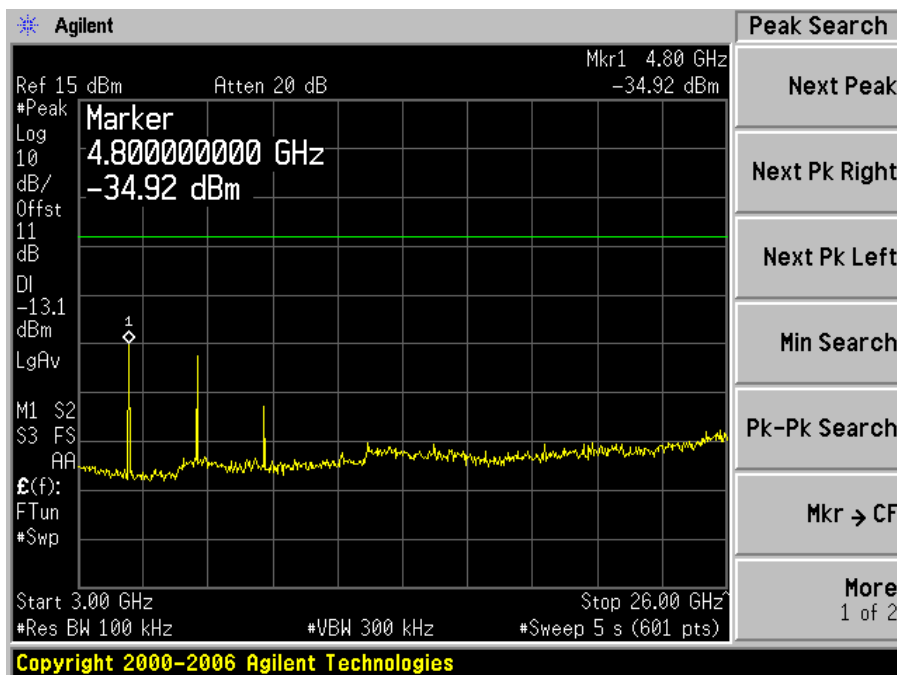
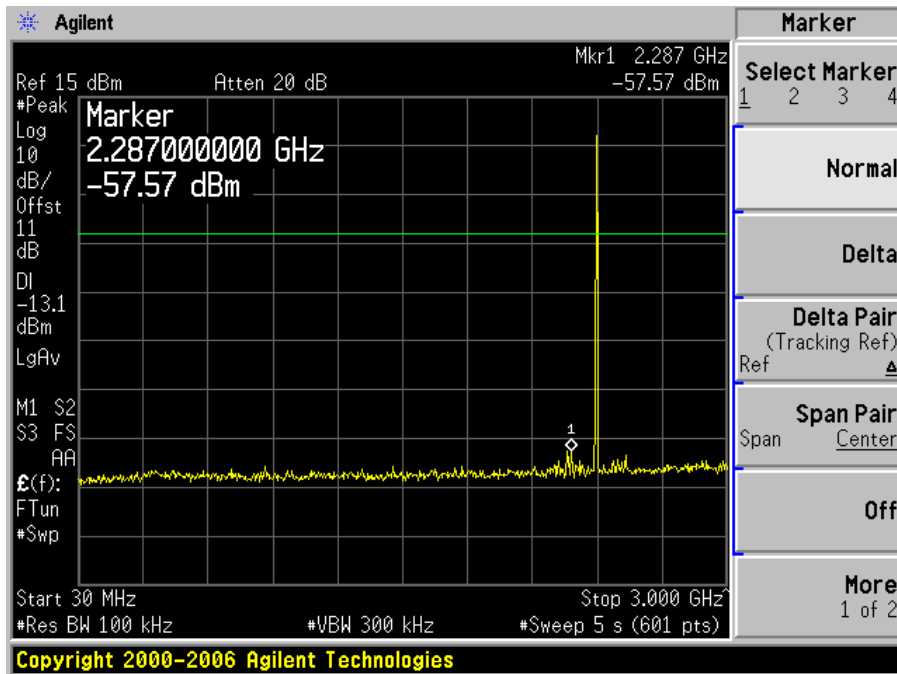
Middle Channel GFSK



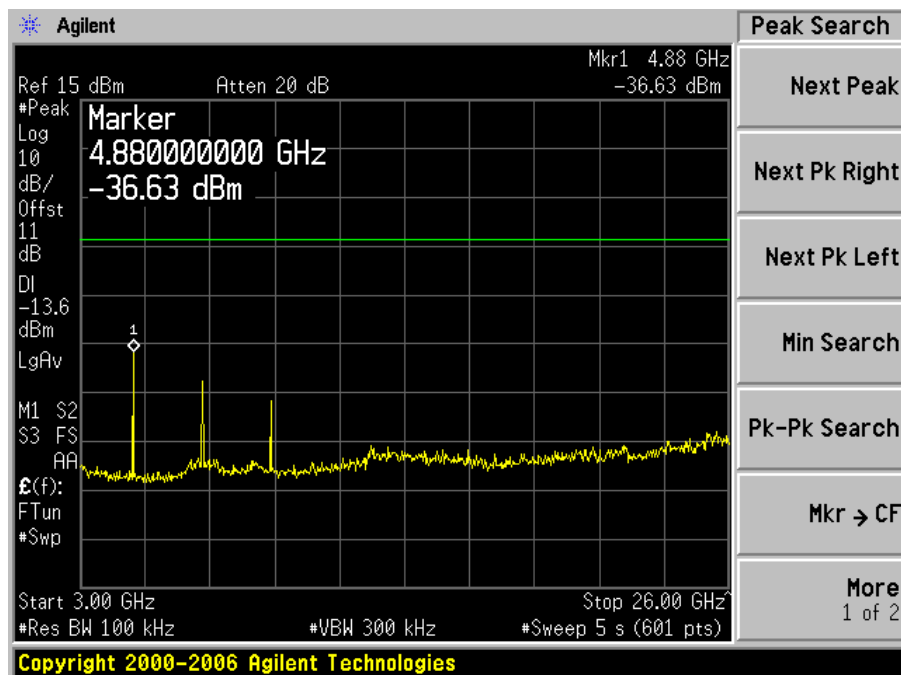
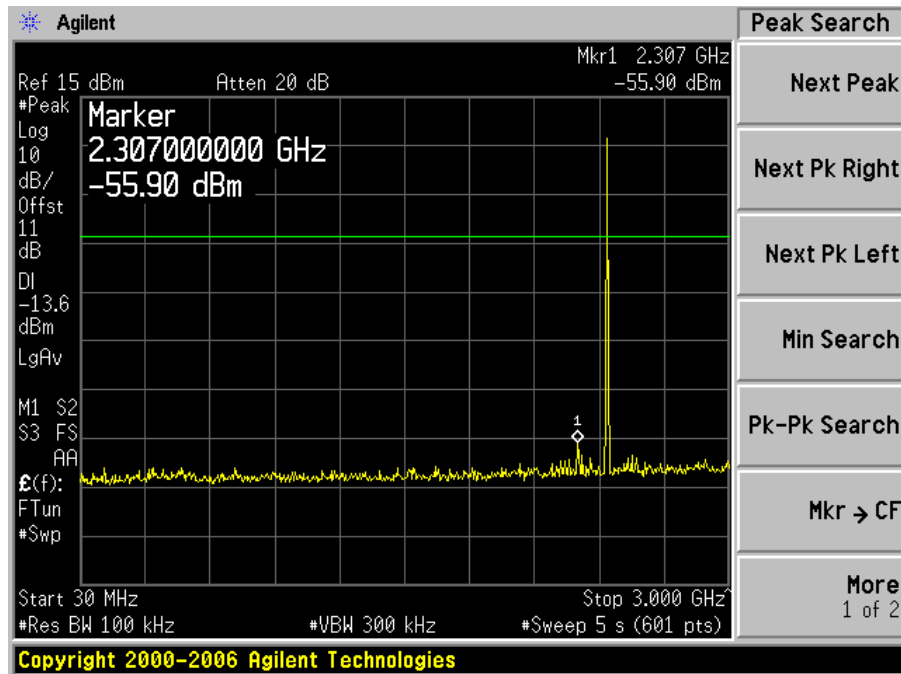
High Channel GFSK



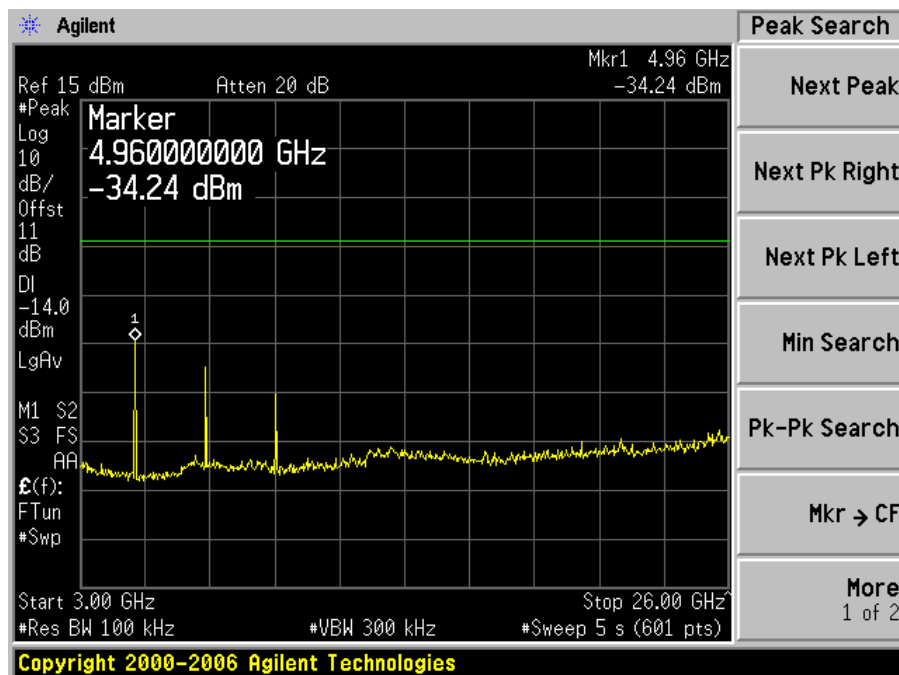
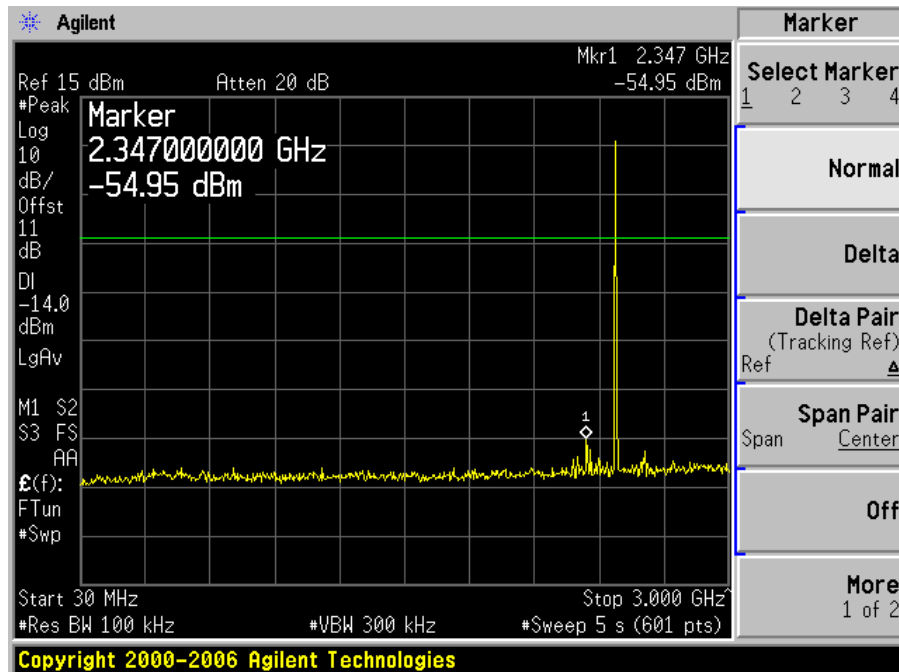
Low Channel QPSK



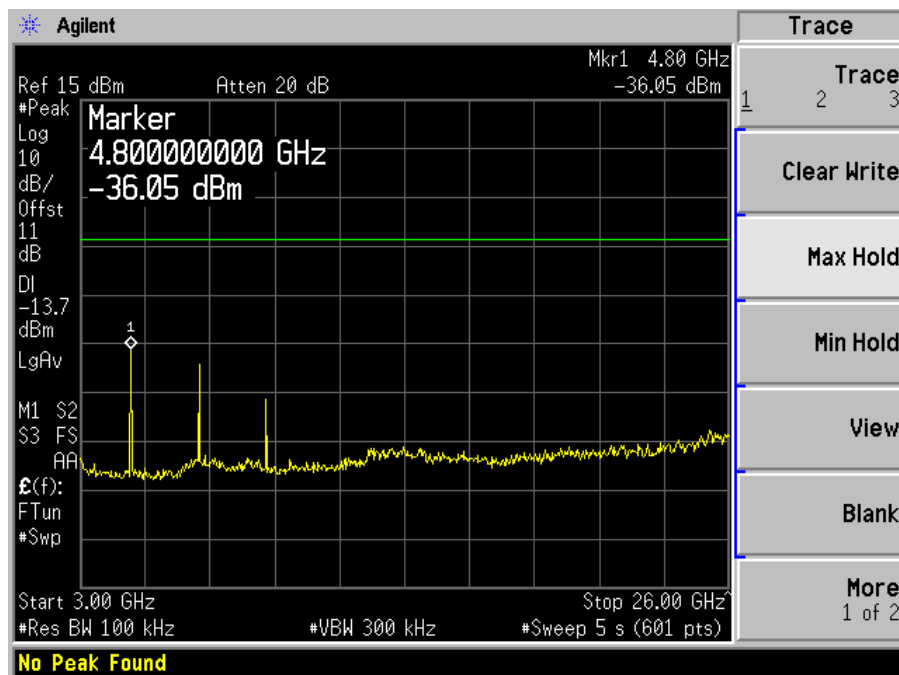
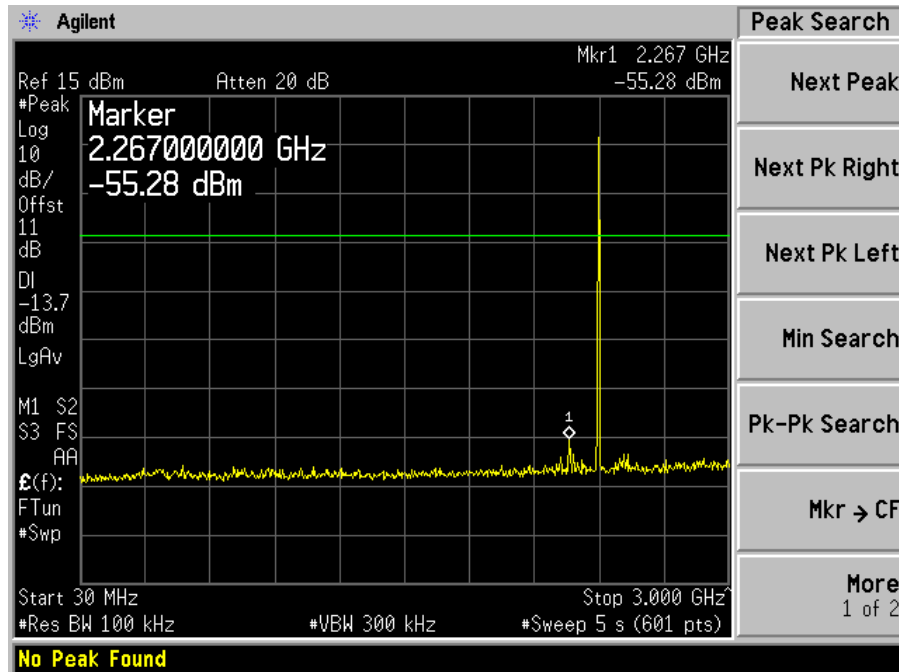
Middle Channel QPSK



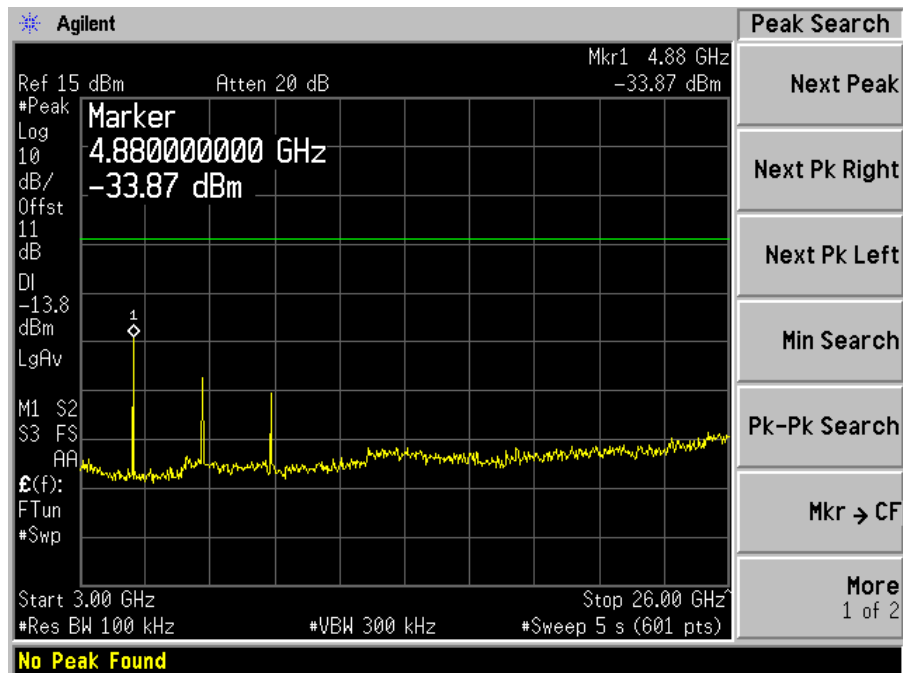
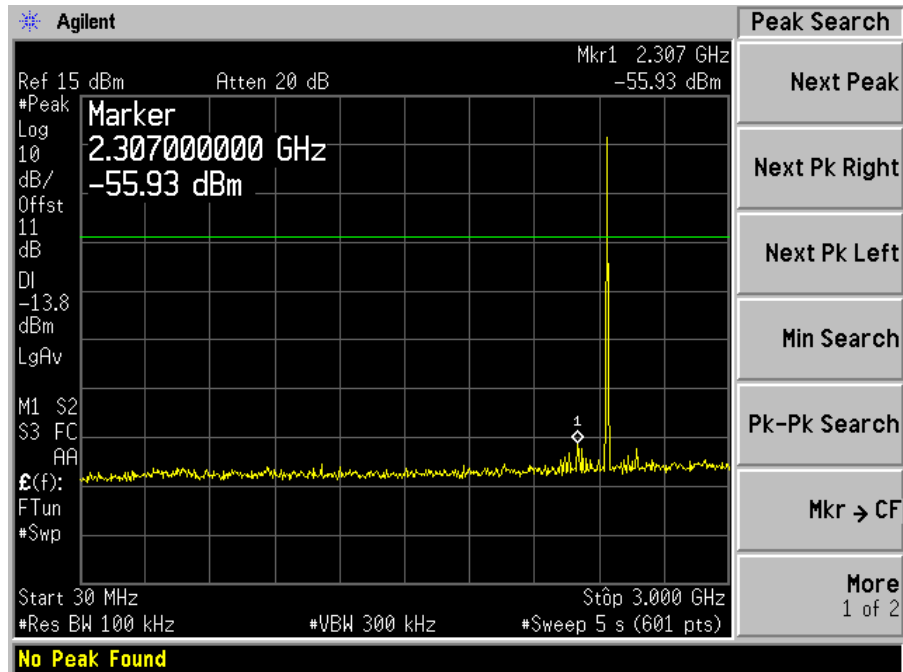
High Channel QPSK



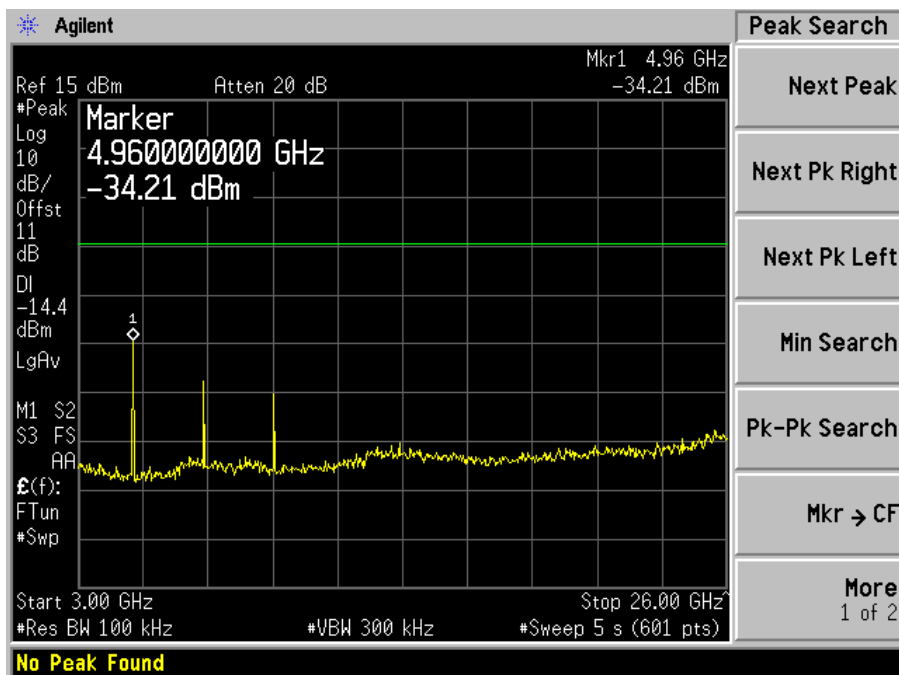
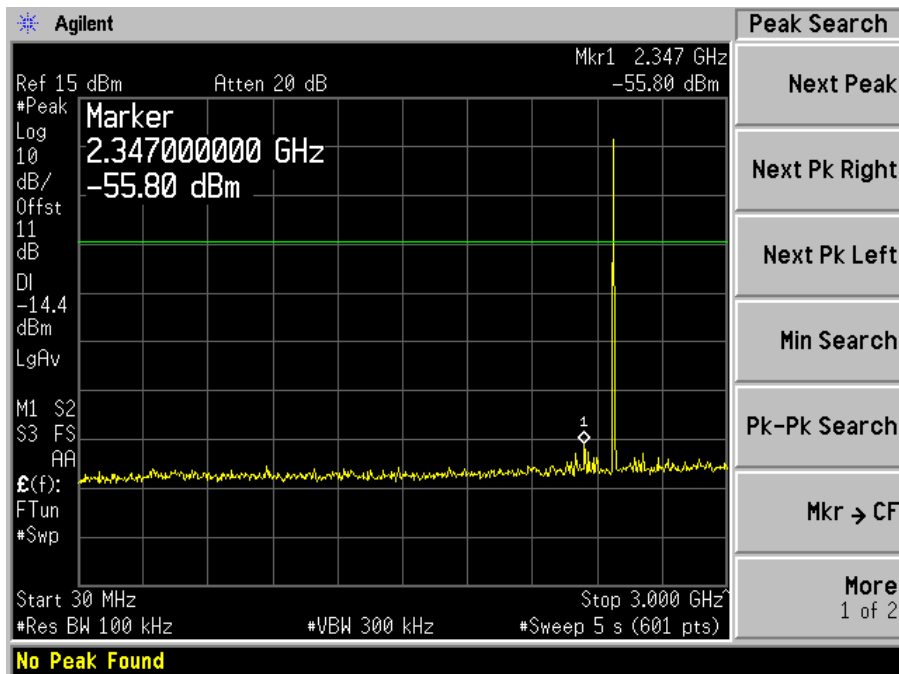
Low Channel 8PSK



Middle Channel 8PSK



High Channel 8PSK



14 FCC §15.247(i) & § 2.1093 - RF Exposure Information

14.1 Applicable Standards

According to FCC §15.247(i) and §2.1093.

14.2 Evaluation Result

According to FCC §15.247 (i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Routine SAR evaluation refers to that specifically required by FCC §2.1093, using measurements or computer simulation. When routine SAR evaluation is not required, portable transmitters with output power greater than the applicable low threshold require SAR evaluation to qualify for TCB approval.

- 1) CDMA can transmit simultaneously with Bluetooth.
- 2) The distance between the CDMA antenna and Bluetooth antenna is more than 5 cm.
- 3) The maximum output power is 11.61 mW , which is less than $2 \cdot P_{\text{Ref}}$ (24 mW).According to KDB648474.

So stand-alone SAR is not required for BT antenna and simultaneous SAR evaluation is not required for Bluetooth and CDMA antennas as well.