



**FCC PART 15, SUBPART C
ISED C RSS-247, ISSUE 2, FEBRUARY 2017
TEST REPORT**

For

Zebra Technologies Corporation

3 Overlook Point, Lincolnshire, IL 60069, USA

**FCC ID: UZ7RE40
IC: 109AN-RE40**

Report Type: Class II Permissive Change	Product Type: RFID Module
Prepared By: Deepak Mishra Test Technician	
Report Number: R2109304-247	
Report Date: 2022-04-28	
Reviewed By: Zhao Zhao RF Project Engineer	
Bay Area Compliance Laboratories Corp. 1274 Anvilwood Avenue, Sunnyvale, CA 94089, USA Tel: +1 (408) 732-9162, Fax: +1 (408) 732-9164	



Note: This test report was prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This test report shall not be used by the customer to claim product certification, approval, or endorsement by A2LA or any agency of the United States Government or any foreign government.

* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "*"

TABLE OF CONTENTS

1 General Description.....	4
1.1 Product Description for Equipment Under Test (EUT)	4
1.2 Objective.....	4
1.3 Related Submittal(s)/Grant(s)	5
1.4 Test Methodology	5
1.5 Measurement Uncertainty	6
1.6 Test Facility Registrations	6
1.7 Test Facility Accreditations	7
2 System Test Configuration.....	9
2.1 Justification.....	9
2.2 EUT Exercise Software.....	9
2.3 Equipment Modification	9
2.4 Power Supply Information	9
2.5 Local Support Equipment	9
2.6 Remote Support Equipment.....	9
2.7 Interface Ports and Cabling.....	9
3 Summary of Test Results	10
4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements	11
4.1 Applicable Standards	11
4.2 Antenna Description	11
5 FCC §15.247(i) §2.1091 & ISED RSS-102 - RF Exposure	12
5.1 Applicable Standards	12
5.2 MPE Prediction.....	13
5.3 MPE Results	13
5.4 RF exposure evaluation exemption for IC	15
6 FCC §15.207 & ISEDC RSS-Gen §8.8 - AC Line Conducted Emissions.....	16
6.1 Applicable Standards	16
6.2 Test Setup	16
6.3 Test Procedure	16
6.4 Corrected Amplitude & Margin Calculation.....	17
6.5 Test Setup Block Diagram	17
6.6 Test Equipment List and Details.....	18
6.7 Test Environmental Conditions	18
6.8 Summary of Test Results	18
6.9 Conducted Emissions Test Plots and Data	19
7 FCC §15.35(b), §15.205, §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions.....	27
7.1 Applicable Standards	27
7.2 Test Setup	29
7.3 Test Setup Block Diagram	29
7.4 Test Procedure	29
7.5 Corrected Amplitude and Margin Calculation.....	30
7.6 Test Equipment List and Details.....	31
7.7 Test Environmental Conditions	31
7.8 Summary of Test Results	32
7.9 Radiated Emissions Test Results	33
8 Annex A (Normative) - EUT Test Setup Photographs	46
9 Annex B (Normative) – Host Device Photographs.....	47
10 Annex C (Normative) - A2LA Electrical Testing Certificate.....	48

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2109304-247	CIIPC Report	2022-03-08
1	R2109304-247	Updated based on 17065 TE's comments	2022-04-28

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report was prepared on behalf of Zebra Technologies Corp., and their product Model: RE40, *FCC ID: UZ7RE40, IC: 109AN-RE40*, the “EUT” as referred to in this report. The EUT is an RFID Module. The EUT was installed in host device model number: ZD611.

1.2 Objective

This report was prepared on behalf of *Zebra Technologies Corp.* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISEDC RSS-247 Issue 2, February 2017.

The objective is to determine compliance with FCC Part 15.247 and ISEDC RSS-247 rules for Radiated Spurious Emissions testing, AC Line Conducted Emission testing for multiple transmitters co-location configuration.

This project is a Permissive Change II submission for the purpose of placing the module in new host (Model: ZD611), and enabling colocation with Wi-Fi and Bluetooth Module (FCC ID: I28MD-FXLAN11AC, IC: 3798B-FXLAN11AC), or BT5 Module Model: EYSNSNZWWZ1 (FCC ID: I28-EYSNSNZWWZ1, IC: 3798B-EYSNSNZWWZ1)

Model Number	RE40
FCC ID	UZ7RE40
IC	109AN-RE40
Radio Type	UHF RFID
Operating Frequency	902.75-927.25 MHz
Modulation	ASK
Channel Spacing	500 kHz
Number of Channels	49
Loop Antenna Gain	-30 dBi
EIRP	0.0005 W

Model Number	WYSBHVXGXG
FCC ID	I28MD-FXLAN11AC
IC	3798B-FXLAN11AC
Radio Type	WLAN-ac/BT
Operating Frequency	2402-2480 MHz, 2412-2462 MHz 5180-5240 MHz, 5260-5320 MHz 5500-5700 MHz, 5745-5825 MHz
Modulation	GFSK, $\pi/4$ -DQPSK, 8DPSK (BDR/EDR); GFSK (LE); DSSS, OFDM (WLAN)
Channel Spacing	1 MHz (BDR, EDR); 2 MHz (LE) 5 MHz (2.4G); 20 MHz (5G); 40 MHz (5G); 80 MHz (5G)
Number of Channels	79 (BDR, EDR); 40 (BLE) 11 (2.4Ghz-802.11b,g,n20); 7 (2.4GHz-802.11n40); 24 (5GHz-802.11a,n20); 11 (5GHz-802.11n40); 5 (5GHz-802.11ac80);
Omnidirectional Antenna Gain	0.3 dBi (2.4G), 4.4 dBi (5G)
EIRP	0.011W (BDR/EDR); 0.007W (LE) 0.05W (2.4G WLAN); 0.055W (UNII-1); 0.049W (UNII-2); 0.03W (UNII-2E); 0.044W (UNII-3)

Model Number	EYSNSNZWWZ1
FCC ID	I28-EYSNSNZWWZ1
IC	3798B-EYSNSNZWWZ1
Radio Type	BT5
Operating Frequency	2402-2480 MHz
Modulation	GFSK
Channel Spacing	2 MHz
Number of Channels	40
Omnidirectional Antenna Gain	-4.0 dBi
EIRP	0.0006 W

1.3 Related Submittal(s)/Grant(s)

N/A

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247

1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the 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.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	$\pm 5\%$
RF output power, conducted	± 0.57 dB
Power Spectral Density, conducted	± 1.48 dB
Unwanted Emissions, conducted	± 1.57 dB
All emissions, radiated	± 4.0 dB
AC power line Conducted Emission	± 2.0 dB
Temperature	$\pm 2^{\circ}$ C
Humidity	$\pm 5\%$
DC and low frequency voltages	$\pm 1.0\%$
Time	$\pm 2\%$
Duty Cycle	$\pm 3\%$

1.6 Test Facility Registrations

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Industry Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.

- For Singapore (Info-Communications Development Authority (IDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2

- For the Hong Kong Special Administrative Region:

- 1 All Radio Equipment, per KHCA 10XX-series Specifications;
- 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
- 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.

- For Japan:

- 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
- 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

The test utility used was the “Toolbox v1.83”, provided by *Zebra Technologies Corp.*, the software is compliant with the standard requirements being tested against.

Radio	Frequency (MHz)	Power Setting
2.4Wifi-b mode	2412	18
5Wifi- a mode	5260	17
BTC- BDR	2402	C
BLE	2402	A
BT5-1mbps	2442	“2221”
RFID	902.75	Default

2.3 Equipment Modification

None.

2.4 Power Supply Information

Manufacturer	Model	Product ID	Serial Number
Zebra	SAWA-74-20924A	P1085000-006	213700984

2.5 Local Support Equipment

Manufacturer	Description	Model
Dell	Laptop	Latitude E6410

2.6 Remote Support Equipment

None.

2.7 Interface Ports and Cabling

Cable Descriptions	Length (m)	From	To
USB Cable	< 1	Laptop	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC & ISED Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1091, §15.247(i) ISED RSS-102	RF Exposure	Compliant
FCC §15.207 ISED RSS-Gen §8.8	AC Line Conducted Emissions	Compliant
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247(d) ISED RSS-247 §5.5 ISED RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant

4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements

4.1 Applicable Standards

According to FCC §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 use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

Radio	External/Internal/ Integral	Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Wi-Fi/BT	Internal	Patch Antenna	2400-2480 MHz	0.3
			5150-5850 MHz	4.4
BT5	External	PCB Antenna	2400-2480 MHz	-4.0
RFID	Internal	Loop Antenna	902.75-927.25 MHz	-30.0

5 FCC §15.247(i) §2.1091 & ISED RSS-102 - RF Exposure

5.1 Applicable Standards

According to FCC §2.1091 (Mobile Devices) RF exposure is calculated.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minute)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	*(100)	30
1.34-30	824/f	2.19/f	*(180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

Note: f = frequency in MHz

* = Plane-wave equivalent power density

According to ISED RSS-102 Issue 5:

2.5.2 Exemption Limits for Routine Evaluation – RF Exposure Evaluation

RF exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm, except when the device operates as follows:

- below 20 MHz⁶ and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 1 W (adjusted for tune-up tolerance);
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $4.49/f^{0.5}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance);
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834}$ W (adjusted for tune-up tolerance), where f is in MHz;
- at or above 6 GHz and the source-based, time-averaged maximum e.i.r.p. of the device is equal to or less than 5 W (adjusted for tune-up tolerance).

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the e.i.r.p. was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

5.3 MPE Results

Bluetooth 2.4 GHz Radio (FCC ID: I28MD-FXLAN11AC)

<u>Maximum average output power at antenna input terminal (dBm):</u>	<u>10.27</u>
<u>Maximum average output power at antenna input terminal (mW):</u>	<u>10.641</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2402</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>0.3</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.0715</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm²):</u>	<u>0.0023</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²):</u>	<u>1.0</u>

WLAN 2.4 GHz Radio (FCC ID: I28MD-FXLAN11AC)

<u>Maximum average output power at antenna input terminal (dBm):</u>	<u>16.77</u>
<u>Maximum average output power at antenna input terminal (mW):</u>	<u>47.534</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>2412</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>0.3</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>1.0715</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm²):</u>	<u>0.010</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²):</u>	<u>1.0</u>

WLAN 5 GHz Radio (FCC ID: I28MD-FXLAN11AC)

<u>Maximum average output power at antenna input terminal (dBm):</u>	<u>14.76</u>
<u>Maximum average output power at antenna input terminal (mW):</u>	<u>29.923</u>
<u>Prediction distance (cm):</u>	<u>20</u>
<u>Prediction frequency (MHz):</u>	<u>5550</u>
<u>Maximum Antenna Gain, typical (dBi):</u>	<u>4.4</u>
<u>Maximum Antenna Gain (numeric):</u>	<u>2.75</u>
<u>Power density of prediction frequency at 20.0 cm (mW/cm²):</u>	<u>0.016</u>
<u>FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²):</u>	<u>1.0</u>

RFID 900 MHz Radio (FCC ID: UZ7RE40)Maximum average output power at antenna input terminal (dBm): 27.20Maximum average output power at antenna input terminal (mW): 524.807Prediction distance (cm): 20Prediction frequency (MHz): 902.75Maximum Antenna Gain, typical (dBi): -30Maximum Antenna Gain (numeric): 0.001Power density of prediction frequency at 20.0 cm (mW/cm²): 0.0001FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 0.602**BT5 2.4 GHz Radio (FCC ID: I28-EYSNSNZWWZ1)**Maximum peak output power at antenna input terminal (dBm): 2.10Maximum peak output power at antenna input terminal (mW): 1.6218Prediction distance (cm): 20Prediction frequency (MHz): 2442Maximum Antenna Gain, typical (dBi): -4.00Maximum Antenna Gain (numeric): 0.398Power density of prediction frequency at 20.0 cm (mW/cm²): 0.00013FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 1**Radio Co-location**

Frequency Band	Max Conducted Power (dBm)	Antenna Gain (dBi)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm ²)	MPE Limit (mW/cm ²)	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
RFID + 2.4 Wi-Fi								
900 MHz Radio	27.20	-30	20	0.0001	0.602	0.02%	2.32%	100%
2.4 WLAN	16.77	0.3	20	0.023	1.0	2.3%		

Frequency Band	Max Conducted Power (dBm)	Antenna Gain (dBi)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm ²)	MPE Limit (mW/cm ²)	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
RFID + 5 Wi-Fi								
900 MHz Radio	27.20	-30	20	0.0001	0.602	0.02%	1.62%	100%
5 WLAN	14.76	4.4	20	0.016	1.0	1.6%		

Frequency Band	Max Conducted Power (dBm)	Antenna Gain (dBi)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm ²)	MPE Limit (mW/cm ²)	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
RFID + Bluetooth								
900 MHz Radio	27.20	-30	20	0.0001	0.602	0.02%	0.43%	100%
Bluetooth	10.27	0.3	20	0.0023	1.0	0.23%		

Frequency Band	Max Conducted Power (dBm)	Antenna Gain (dBi)	Evaluated Distance (cm)	Worst-Case MPE (mW/cm ²)	MPE Limit (mW/cm ²)	Worst-Case MPE Ratios	Sum of MPE Ratios	Limit
RFID + BT5								
900 MHz Radio	27.20	-30	20	0.0001	0.602	0.02%	0.033%	100%
BT5	2.10	-4.00	20	0.00013	1.0	0.013%		

Results

For the different combination of transmitters, a separation distance of 20 cm complies with the MPE simultaneous transmission limit of ≤ 1.0 .

5.4 RF exposure evaluation exemption for IC

RFID 902.75 MHz (IC: 109AN-RE40)

$$27.20 \text{ dBm} + (-30.0) \text{ dBi} = -2.8 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 1.371 \text{ W} = 31.370 \text{ dBm}$$

BT BR, 2402 MHz (IC: 3798B-FXLANAC)

$$10.27 \text{ dBm} + 0.3 \text{ dBi} = 10.57 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 2.676 \text{ W} = 34.275 \text{ dBm}$$

WLAN 802.11b, 2412 MHz (IC: 3798B-FXLANAC)

$$16.77 \text{ dBm} + 0.3 \text{ dBi} = 17.07 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 2.684 \text{ W} = 34.288 \text{ dBm}$$

WLAN 802.11n40, 5550 MHz (IC: 3798B-FXLANAC)

$$14.76 \text{ dBm} + 4.4 \text{ dBi} = 19.16 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 4.744 \text{ W} = 36.761 \text{ dBm}$$

BT5 1Mbps 2442MHz (IC: 3798B-EYSNSNZWWZ1)

$$2.10 \text{ dBm} + -4.00 \text{ dBi} = -1.90 \text{ dBm} < 1.31 \times 10^{-2} f^{0.6834} = 2.707 \text{ W} = 34.325 \text{ dBm}.$$

Therefore, RF exposure is not required.

6 FCC §15.207 & ISEDC RSS-Gen §8.8 - AC Line Conducted Emissions

6.1 Applicable Standards

As per FCC §15.207 and ISED RSS-Gen §8.8 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 ^{Note1}	56 to 46 ^{Note2}
0.5-5	56	46
5-30	60	50

Note1: Decreases with the logarithm of the frequency.

Note2: A linear average detector is required

6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.207 and ISED RSS-Gen §8.8 limits.

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

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

6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cords of support equipment were connected to LISN-2.

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

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

6.4 Corrected Amplitude & Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Correction Factor (CF) to indicated Amplitude (A_i) reading. The basic equation is as follows:

$$CA = A_i + CF$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Correction Factor (13.7 dB)

The Correction Factor is calculated by adding Cable loss (CL), LISN calibration factor, and attenuation of the impulse limiter and the high pass filter. The basic equation is as follows:

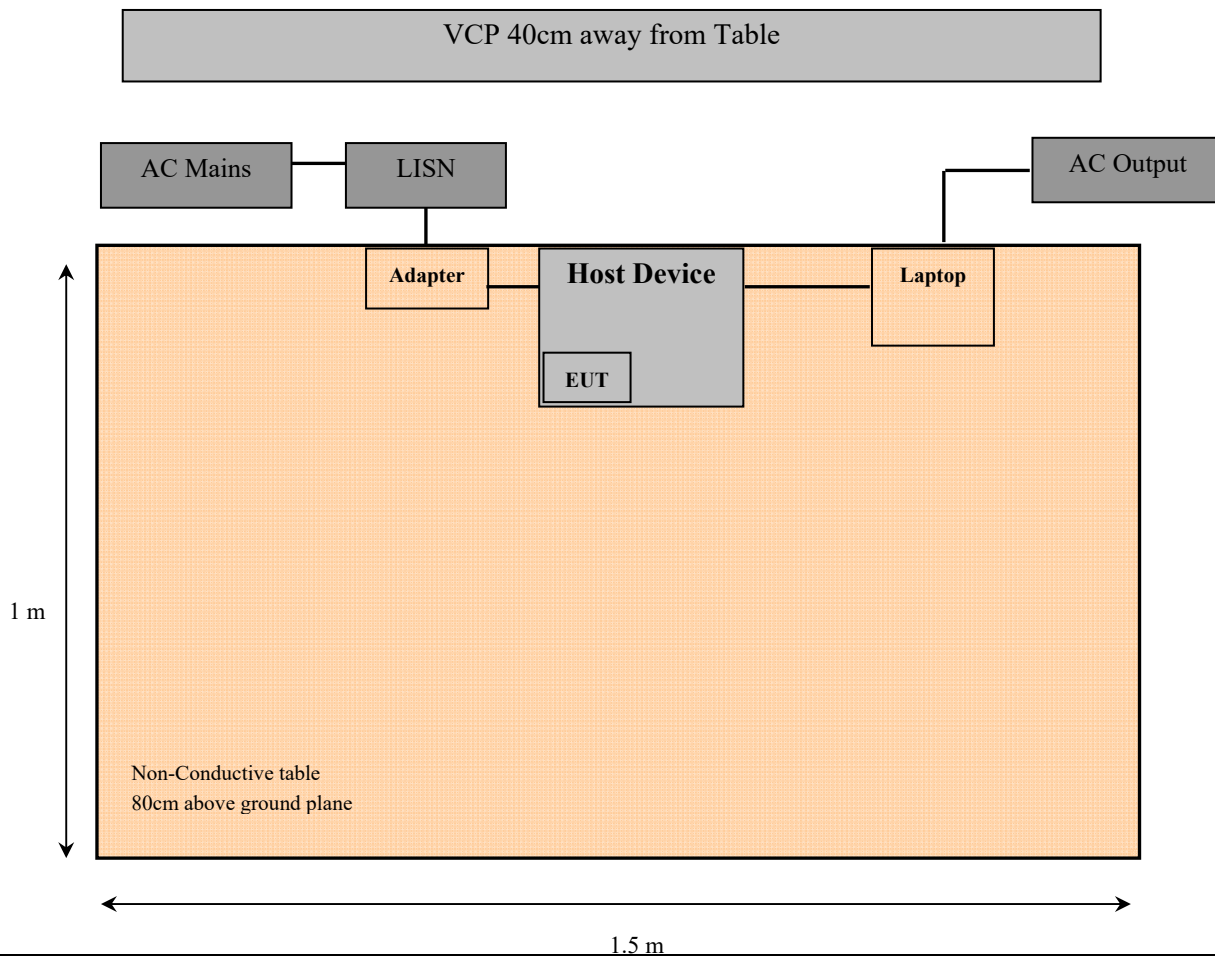
$$CF = CL + \text{LISN calibration factor} + \text{Attenuation}$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.5 dB) + LISN calibration factor (0.2 dB) + Attenuator (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:

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

6.5 Test Setup Block Diagram



6.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100044	2021-05-14	2 years
Rohde and Schwarz	Impulse Limiter	ESH3-Z2	101962	2021-07-07	1 year
Solar Electronics Company	High Pass Filter	Type 7930-100	7930150204	2021-03-02	1 year
Suirong	30 ft conductive emission cable	LMR 400	-	N/R	N/A
FCC	LISN	FCC-LISN-50-25-2-10-CISPR16	160129	2020-10-13	15 months
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Statement of Traceability: *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

6.7 Test Environmental Conditions

Temperature:	14.7° C
Relative Humidity:	53 %
ATM Pressure:	101.4 kPa

The testing was performed by Deepak Mishra from 2021-12-21 to 2021-12-28 in RF site.

6.8 Summary of Test Results

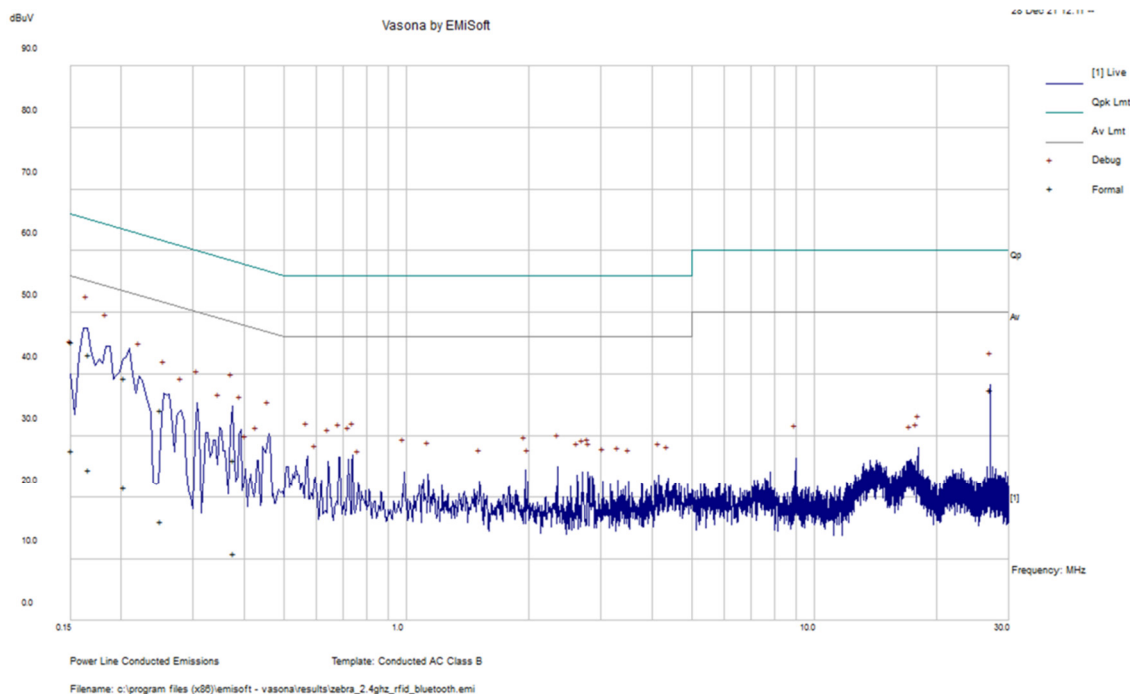
According to the recorded data in following table, the EUT complied with the FCC 15C and ISED RSS-Gen standard's conducted emissions limits, with the margin reading of:

Connection: AC/DC Adapter Connected to 120 V/60 Hz, AC			
Margin (dB)	Frequency (MHz)	Conductor Mode (Line/Neutral)	Range (MHz)
-12.32	26.999723	Neutral	0.15-30

6.9 Conducted Emissions Test Plots and Data

2.4GHz Wi-Fi +RFID Colocation

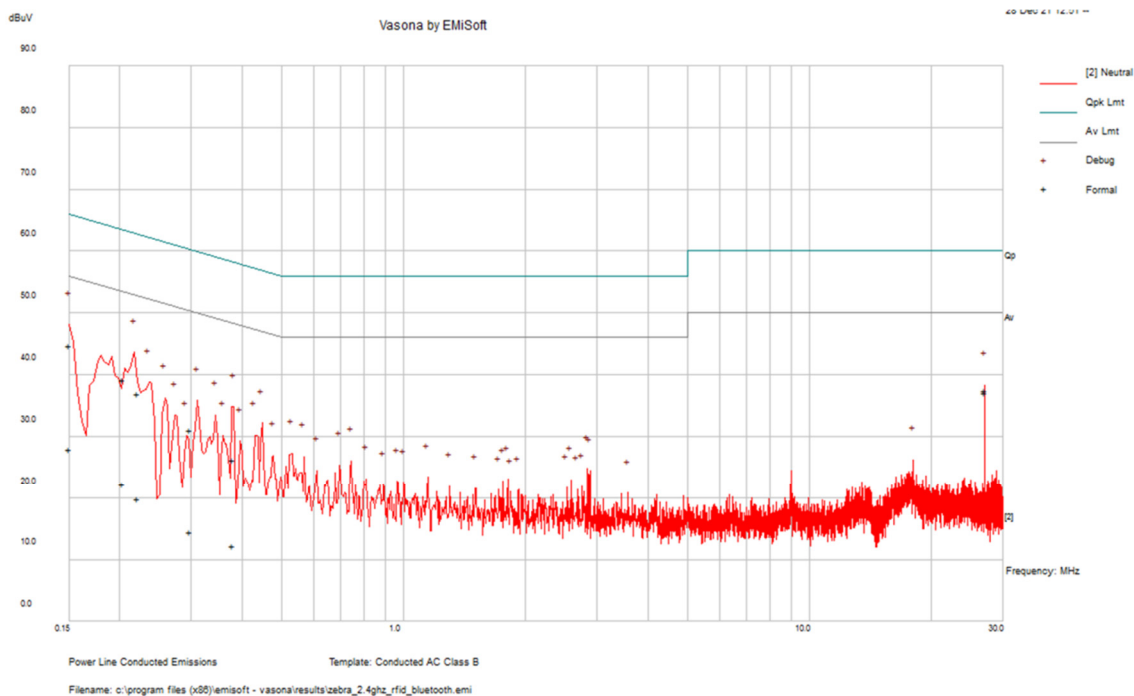
120 V, 60 Hz – Line



Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.15112	34.52	10.81	45.34	Line	65.94	-20.6	QP
0.1667	32.4	10.79	43.19	Line	65.12	-21.94	QP
26.999723	26.96	10.50	37.46	Line	60	-22.54	QP
0.203313	28.63	10.73	39.36	Line	63.47	-24.11	QP
0.378408	15.59	10.51	26.1	Line	58.31	-32.22	QP
0.25036	23.54	10.67	34.21	Line	61.75	-27.53	QP

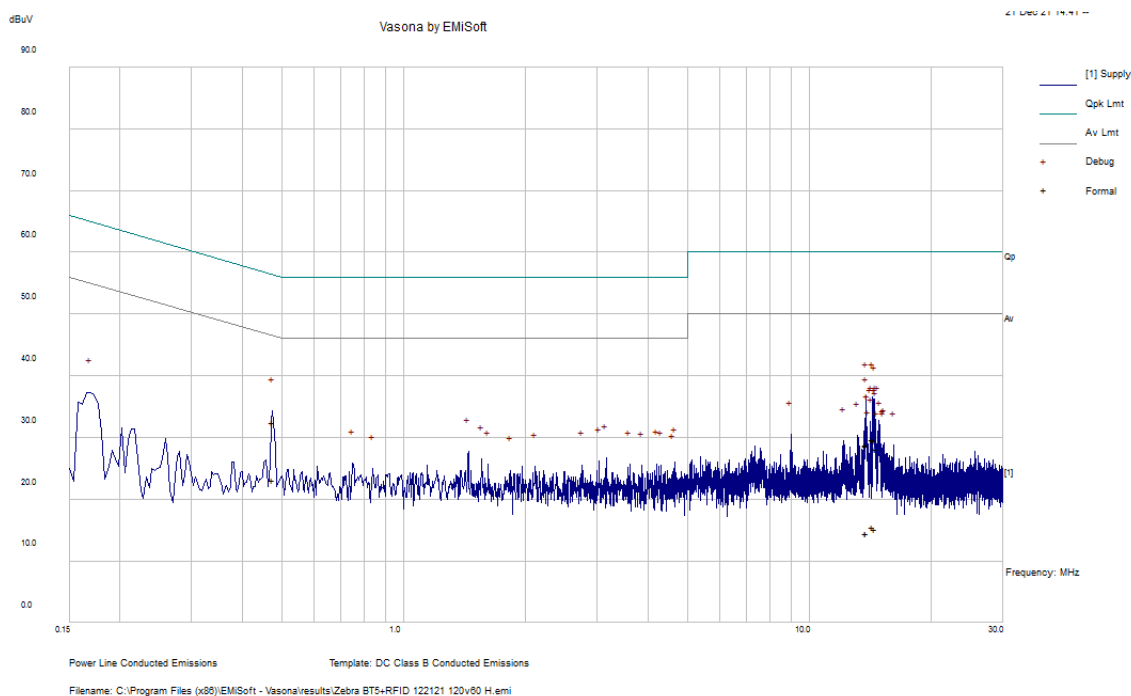
Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Live/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
17.99909	16.77	10.81	27.59	Line	55.94	-28.35	Ave.
18.00144	13.74	10.79	24.53	Line	55.12	-30.6	Ave.
26.99902	27.07	10.50	37.56	Line	50	-12.44	Ave.
18.0524	10.81	10.73	21.55	Line	53.47	-31.93	Ave.
17.94511	0.27	10.51	10.78	Line	48.31	-37.54	Ave.
17.98118	5.33	10.67	16	Line	51.75	-35.75	Ave.

120 V, 60 Hz – Neutral



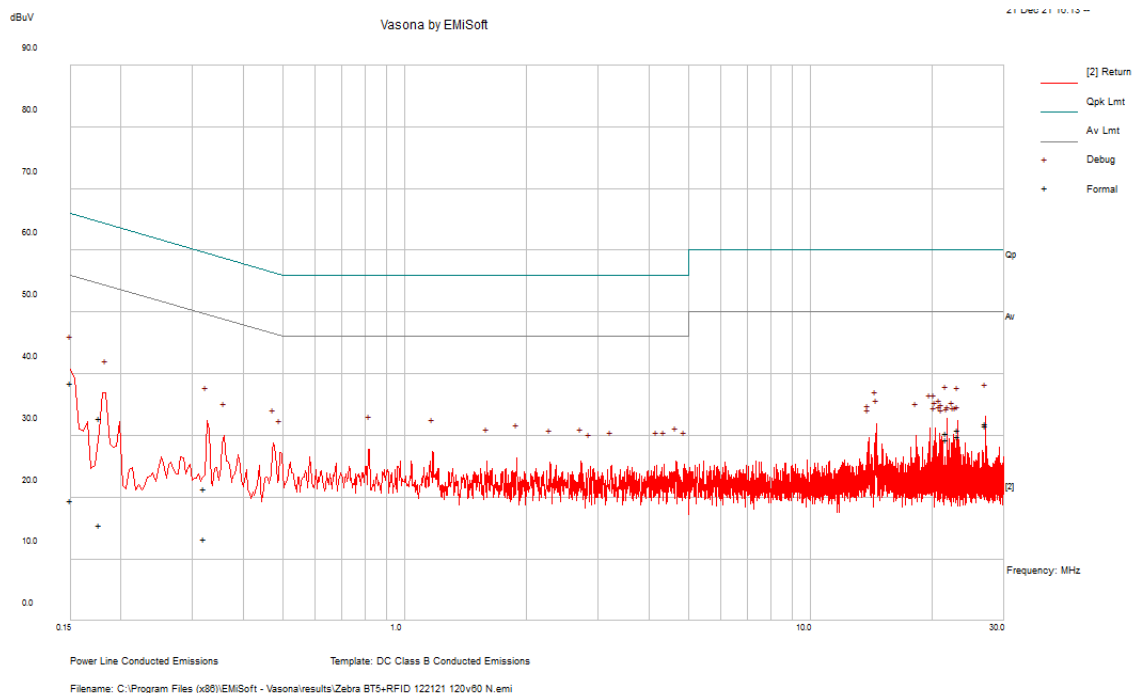
Frequency (MHz)	Ai Reading (dBUV)	Correction Factor (dB)	Corrected Amplitude (dBUV)	Conductor (Line/Neutral)	Limit (dBUV)	Margin (dB)	Detector (QP/Ave.)
0.150075	33.96	10.82	44.78	Neutral	66	-21.22	QP
0.203343	28.42	10.73	39.15	Neutral	63.47	-24.32	QP
27.00006	26.7	10.5	37.2	Neutral	60	-22.8	QP
0.222001	26.26	10.71	36.97	Neutral	62.74	-25.78	QP
0.379409	15.67	10.51	26.18	Neutral	58.29	-32.12	QP
0.298989	20.4	10.62	31.02	Neutral	60.27	-29.25	QP

Frequency (MHz)	Ai Reading (dBUV)	Correction Factor (dB)	Corrected Amplitude (dBUV)	Conductor (Line/Neutral)	Limit (dBUV)	Margin (dB)	Detector (QP/Ave.)
0.150075	17.15	10.82	27.97	Neutral	56	-28.03	Ave.
0.203343	11.53	10.73	22.27	Neutral	53.47	-31.21	Ave.
27.00006	26.96	10.5	37.46	Neutral	50	-12.54	Ave.
0.222001	9.14	10.71	19.85	Neutral	52.74	-32.9	Ave.
0.379409	1.69	10.51	12.2	Neutral	48.29	-36.1	Ave.
0.298989	3.81	10.62	14.43	Neutral	50.27	-35.84	Ave.

Bluetooth + RFID Colocation**120 V, 60 Hz – Line**

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.476099	22.64	9.92	32.57	Line	56.41	-23.84	QP
13.78009	18.33	10.29	28.63	Line	60	-31.37	QP
14.34115	19.47	10.30	29.77	Line	60	-30.23	QP
14.47191	19.26	10.31	29.57	Line	60	-30.43	QP
13.8017	18.51	10.29	28.79	Line	60	-31.21	QP
14.57674	17.89	10.31	28.19	Line	60	-31.81	QP

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Live/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.476099	13.22	9.92	23.15	Line	46.41	-23.26	Ave.
13.78009	4.23	10.29	14.52	Line	50	-35.48	Ave.
14.34115	5.19	10.30	15.49	Line	50	-34.51	Ave.
14.47191	4.82	10.31	15.13	Line	50	-34.87	Ave.
13.8017	4.24	10.29	14.53	Line	50	-35.47	Ave.
14.57674	17.88	10.31	28.19	Line	50	-21.81	Ave.

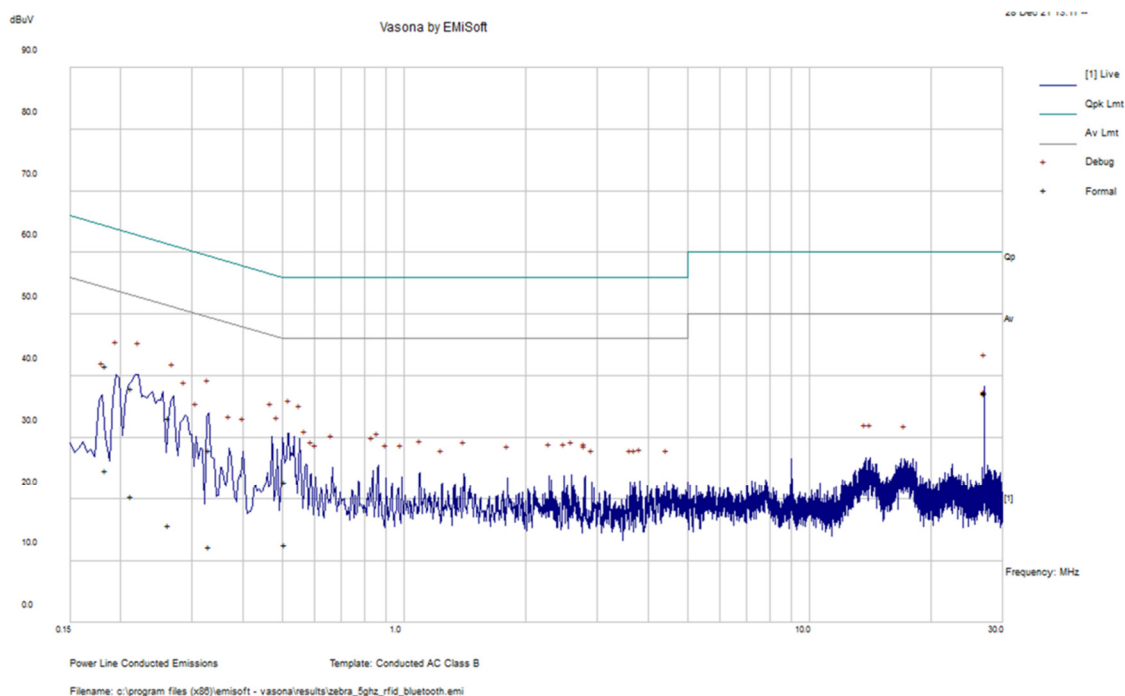
120 V, 60 Hz – Neutral

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150318	28.74	9.72	38.46	Neutral	65.98	-27.52	QP
26.999651	21.19	10.46	31.66	Neutral	60	-28.34	QP
0.320629	11.47	9.89	21.36	Neutral	59.69	-38.33	QP
21.662417	19.91	10.44	30.35	Neutral	60	-29.65	QP
0.177176	22.99	9.78	32.77	Neutral	64.62	-31.85	QP
23.129586	20.48	10.4	30.88	Neutral	60	-29.12	QP

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150318	9.87	9.72	19.59	Neutral	55.98	-36.39	Ave.
26.999651	21.5	10.46	31.97	Neutral	50	-18.03	Ave.
0.320629	3.38	9.89	13.27	Neutral	49.69	-36.42	Ave.
21.662417	18.87	10.44	29.31	Neutral	50	-20.69	Ave.
0.177176	5.69	9.78	15.47	Neutral	54.62	-39.15	Ave.
23.129586	19.47	10.4	29.88	Neutral	50	-20.12	Ave.

5 GHz Wi-Fi +RFID Colocation

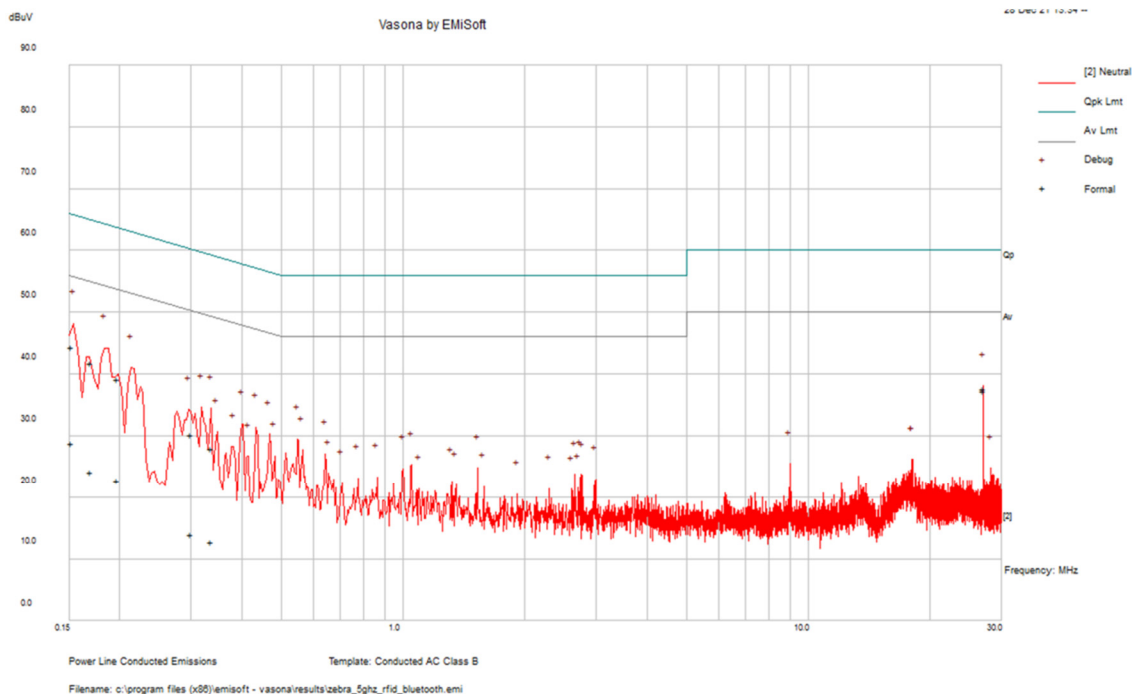
120 V, 60 Hz – Line



Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
27.00049	26.69	10.50	37.19	Line	60	-22.81	QP
0.212691	27.3	10.72	38.02	Line	63.1	-25.08	QP
0.183168	30.93	10.76	41.69	Line	64.34	-22.65	QP
0.261938	22.54	10.66	33.2	Line	61.37	-28.17	QP
0.507125	12.36	10.37	22.74	Line	56	-33.26	QP
0.330228	17.46	10.57	28.03	Line	59.45	-31.41	QP

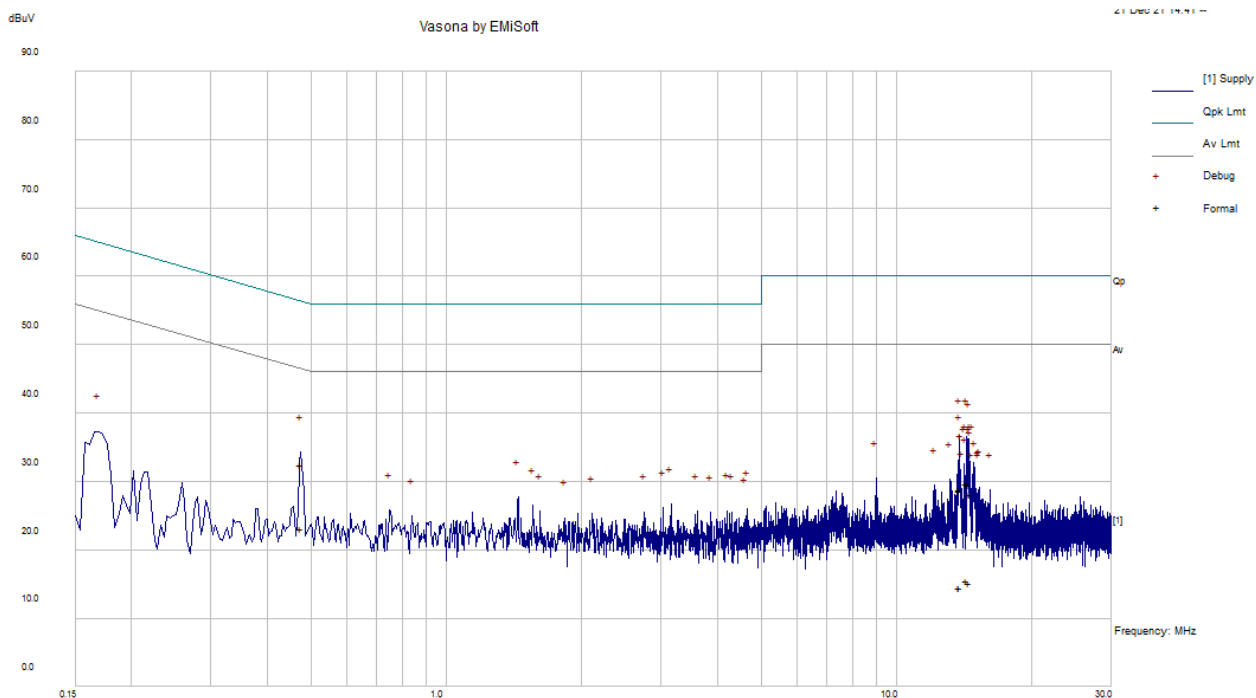
Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
27.00049	26.80	10.50	37.30	Line	50	-12.70	Ave.
0.212691	9.57	10.72	20.29	Line	53.1	-32.81	Ave.
0.183168	13.98	10.76	24.74	Line	54.34	-29.6	Ave.
0.261938	5.04	10.66	15.7	Line	51.37	-35.67	Ave.
0.507125	2.15	10.37	12.53	Line	46	-33.47	Ave.
0.330228	1.63	10.57	12.21	Line	49.45	-37.24	Ave.

120 V, 60 Hz – Neutral



Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.15195	33.63	10.81	44.45	Neutral	65.89	-21.44	QP
0.169994	30.96	10.78	41.74	Neutral	64.96	-23.22	QP
26.99972	26.91	10.5	37.4	Neutral	60	-22.6	QP
0.197776	28.44	10.74	39.19	Neutral	63.7	-24.52	QP
0.336791	17.42	10.56	27.98	Neutral	59.28	-31.3	QP
0.300782	19.62	10.62	30.24	Neutral	60.22	-29.98	QP

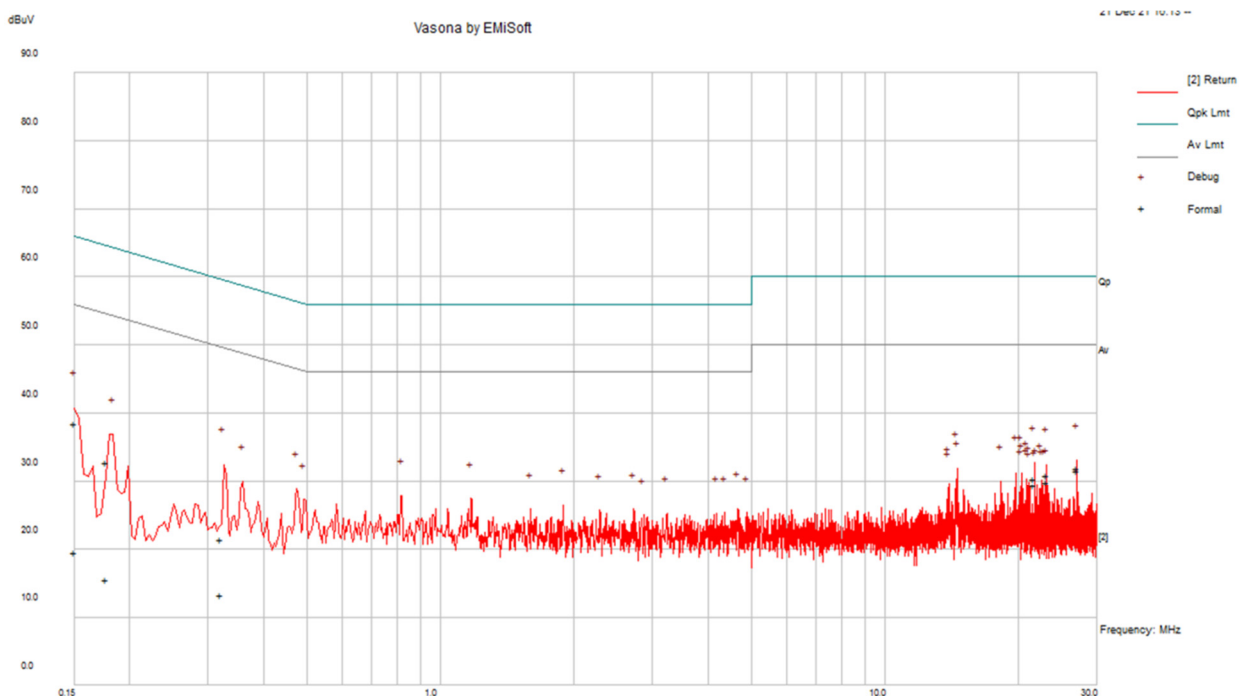
Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.15195	17.95	10.81	28.76	Neutral	55.89	-27.13	Ave.
0.169994	13.45	10.78	24.23	Neutral	54.96	-30.73	Ave.
26.999723	27.18	10.5	37.68	Neutral	50	-12.32	Ave.
0.197776	12.13	10.74	22.87	Neutral	53.7	-30.83	Ave.
0.336791	2.12	10.56	12.69	Neutral	49.28	-36.6	Ave.
0.300782	3.42	10.62	14.04	Neutral	50.22	-36.18	Ave.

BT5 +RFID Colocation**120 V, 60 Hz – Line**

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.476099	22.64	9.93	32.57	Line	56.41	-23.84	QP
13.780091	18.33	10.3	28.63	Line	60	-31.37	QP
14.341148	19.47	10.3	29.77	Line	60	-30.23	QP
14.471908	19.26	10.31	29.57	Line	60	-30.43	QP
13.801703	18.51	10.28	28.79	Line	60	-31.21	QP
14.57674	17.89	10.3	28.19	Line	60	-31.81	QP

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.476099	13.22	9.93	23.15	Line	46.41	-23.26	Ave.
13.780091	4.23	10.29	14.52	Line	50	-35.48	Ave.
14.341148	5.2	10.29	15.49	Line	50	-34.51	Ave.
14.471908	4.82	10.31	15.13	Line	50	-34.87	Ave.
13.801703	4.24	10.29	14.53	Line	50	-35.47	Ave.
14.57674	17.88	10.31	28.19	Line	50	-21.81	Ave.

120 V, 60 Hz – Neutral



Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150318	28.74	9.72	38.46	Neutral	65.98	-27.52	QP
26.999651	21.19	10.47	31.66	Neutral	60	-28.34	QP
0.320629	11.47	9.89	21.36	Neutral	59.69	-38.33	QP
21.662417	19.91	10.44	30.35	Neutral	60	-29.65	QP
0.177176	22.99	9.78	32.77	Neutral	64.62	-31.85	QP
23.129586	20.48	10.4	30.88	Neutral	60	-29.12	QP

Frequency (MHz)	Ai Reading (dBuV)	Correction Factor (dB)	Corrected Amplitude (dBuV)	Conductor (Line/Neutral)	Limit (dBuV)	Margin (dB)	Detector (QP/Ave.)
0.150318	9.87	9.72	19.59	Neutral	55.98	-36.39	Ave.
26.999651	21.5	10.47	31.97	Neutral	50	-18.03	Ave.
0.320629	3.38	9.89	13.27	Neutral	49.69	-36.42	Ave.
21.662417	18.87	10.44	29.31	Neutral	50	-20.69	Ave.
0.177176	5.69	9.78	15.47	Neutral	54.62	-39.15	Ave.
23.129586	19.47	10.41	29.88	Neutral	50	-20.12	Ave.

7 FCC §15.35(b), §15.205, §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

7.1 Applicable Standards

As per FCC §15.35(b): 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 §15.205(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 §15.209(a): 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 §15.247 (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)).

As per ISSED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength ($\mu\text{V/m}$ at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISSED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

7.2 Test Setup

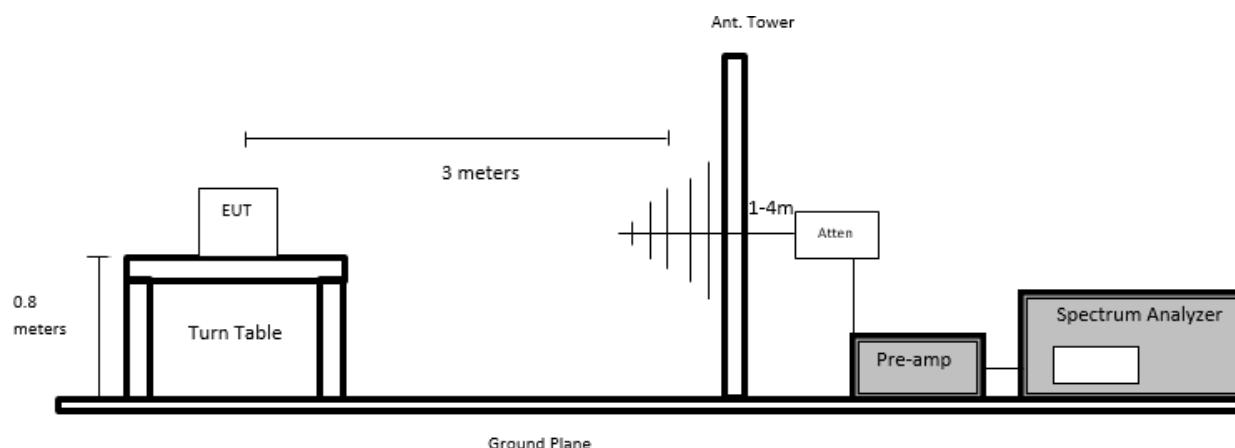
The radiated emissions tests were performed in the 5-meter chamber and 10-meter chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISEDC RSS-247.

The spacing between the peripherals was 10 centimeters.

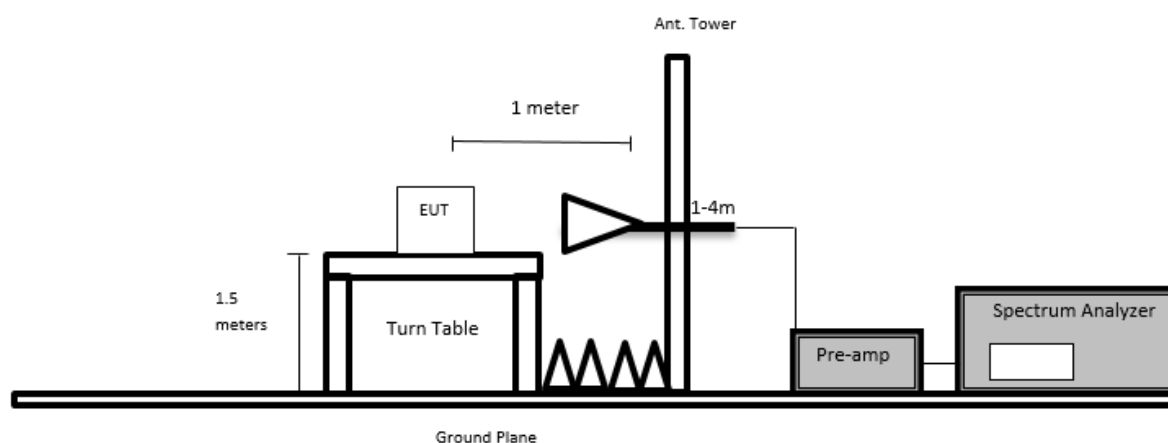
External I/O cables were draped along the edge of the test table and bundled when necessary.

7.3 Test Setup Block Diagram

30 MHz to 1 GHz:



Above 1 GHz



7.4 Test Procedure

For the radiated emissions test, the EUT host and all support equipment power cords were 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 was set 3 meter away from the testing antenna, which was varied from 1-4 meters, and the EUT was placed on a turntable, which was 0.8 meters and 1.5 meters above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

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

Above 1000 MHz:

- (1) Peak: $\text{RBW} = 1\text{MHz} / \text{VBW} = 1\text{MHz} / \text{Sweep} = \text{Auto}$
- (2) Average: $\text{RBW} = 1\text{MHz} / \text{VBW} = 10\text{Hz or } 1/\text{T} / \text{Sweep} = \text{Auto}$

7.5 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

$$\text{CA} = \text{S.A. Reading} + \text{Correction Factor}$$

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

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:

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

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$\text{CA} = \text{Ai} + \text{AF} + \text{CL} + \text{Atten} - \text{Ga}$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 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:

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

7.6 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	EMI Test Receiver	ESCI 1166.5950K03	100044	2021-11-18	1 year
Agilent	Analyzer, Spectrum	E4446A	US44300386	2021-04-27	1 year
Sunol Science Corp	System Controller	SC99V	011003-1	N/R	N/R
BACL	5m3 Sensitivity Box	1	1909201	2019-11-30	13 months
HP	Pre-Amplifier	8447D	2944A07030	2020-08-17	18 months
AH Systems	Pre-Amplifier	PAM 1840 VH	170	2021-11-09	1 year
Sunol Sciences	Biconilog Antenna	JB3	A020106-2	2021-11-22	2 years
ETS Lindgren	Horn Antenna	3117	00218973	2021-09-14	2 years
Wisewave	Horn Antenna, 18 – 26.5 GHz	ARH-4223-02	10555-02	2020-02-05	2 years
Wisewave	Horn Antenna, 26.5 – 40 GHz	ARH-2823-02	10555-01	2020-02-27	2 years
Pasternack	Coaxial Cable, RG213	PE3496-800CM	2111301	2021-11-30	1 year
IW Microwave	157 Series Cable Armored with 2.92mm Male Plugs on Both Sides	KPS-1571AN-2400	DC 1922	2021-07-06	1 year
-	RF cable	-	-	Each time ¹	N/A
-	Notch filters	-	-	Each time ¹	N/A
Keysight Technologies	RF Limiter	11867A	MY42242932	2021-03-03	1 year
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

Note¹: cable and notch filters included in the test set-up will be checked each time before testing.

Statement of Traceability: *BACL Corp.* attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 “A2LA Policy on Metrological Traceability”.

7.7 Test Environmental Conditions

Temperature:	20-22 °C
Relative Humidity:	42-50 %
Barometric Pressure:	102.7 kPa

The testing was performed by Alexandrae Duran and Deepak Mishra from 2021-12-06 to 2021-12-17 in 5m chamber 3.

7.8 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISEDC RSS-247 standard's radiated emissions limits, and had the worst margin of:

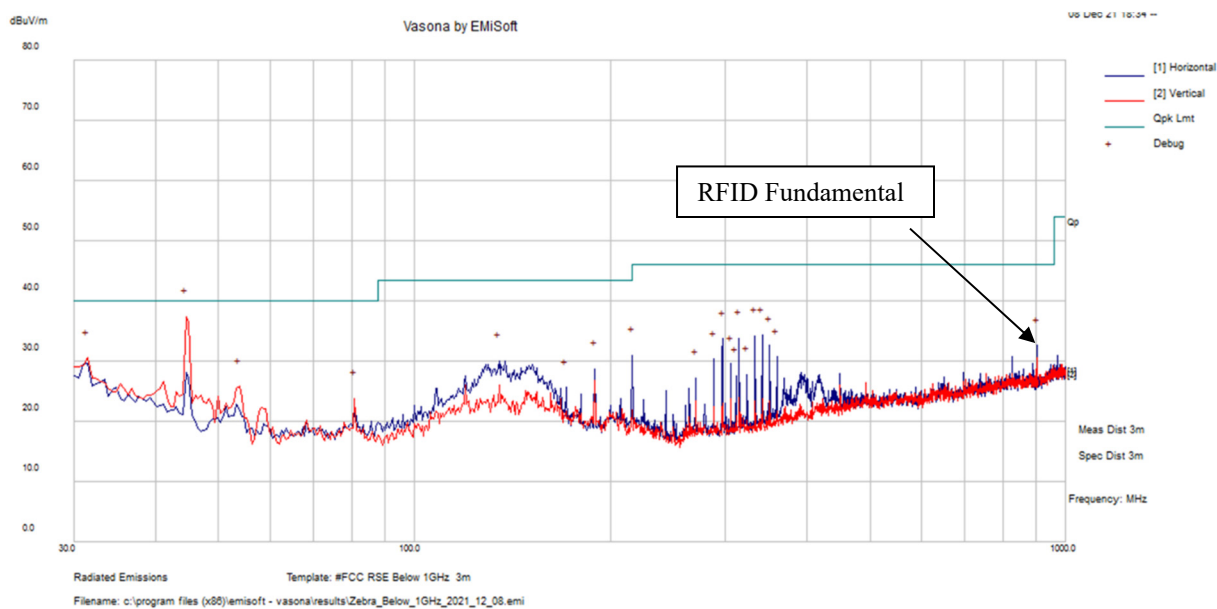
Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, channel
-0.31	4825.156	Vertical	2.4Wifi + 902.75 MHz RFID

Please refer to the following table and plots for specific test result details.

7.9 Radiated Emissions Test Results

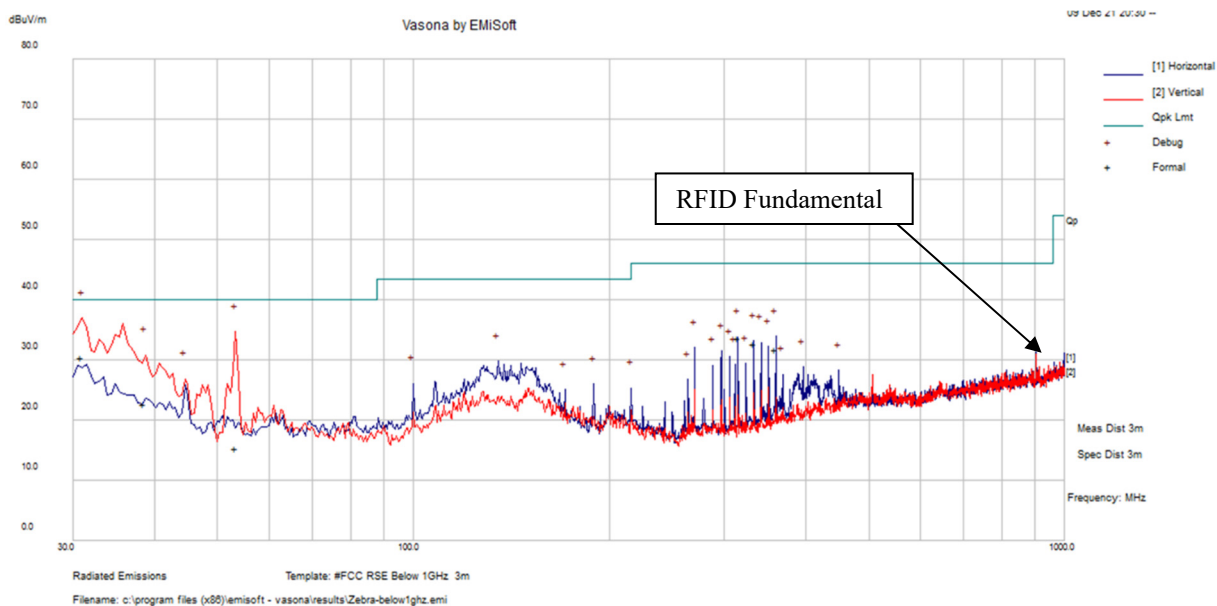
30 MHz – 1 GHz Worst Case, Measured at 3 meters

2.4GHz Wi-Fi + RFID Colocation



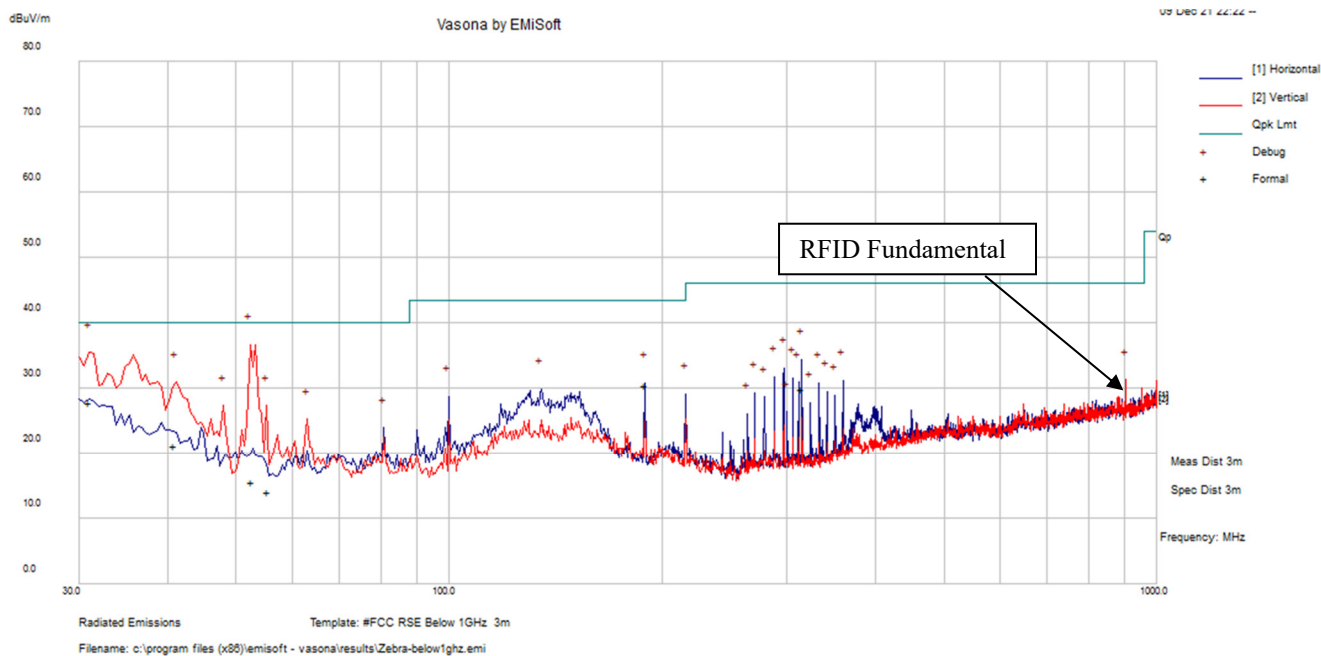
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
44.93	42.56	-8.52	34.04	113	V	241	40	-5.96	QP
31.21	22.13	1.57	23.7	284	H	111	40	-16.3	QP
342.02	37.89	-3.89	34	105	H	276	46	-12.00	QP
332.99	37.06	-4	33.05	101	H	262	46	-12.95	QP
315.10	38.59	-4.2	34.39	102	H	263	46	-11.61	QP
296.98	36.7	-4.72	31.98	102	H	261	46	-14.02	QP

Bluetooth + RFID Colocation



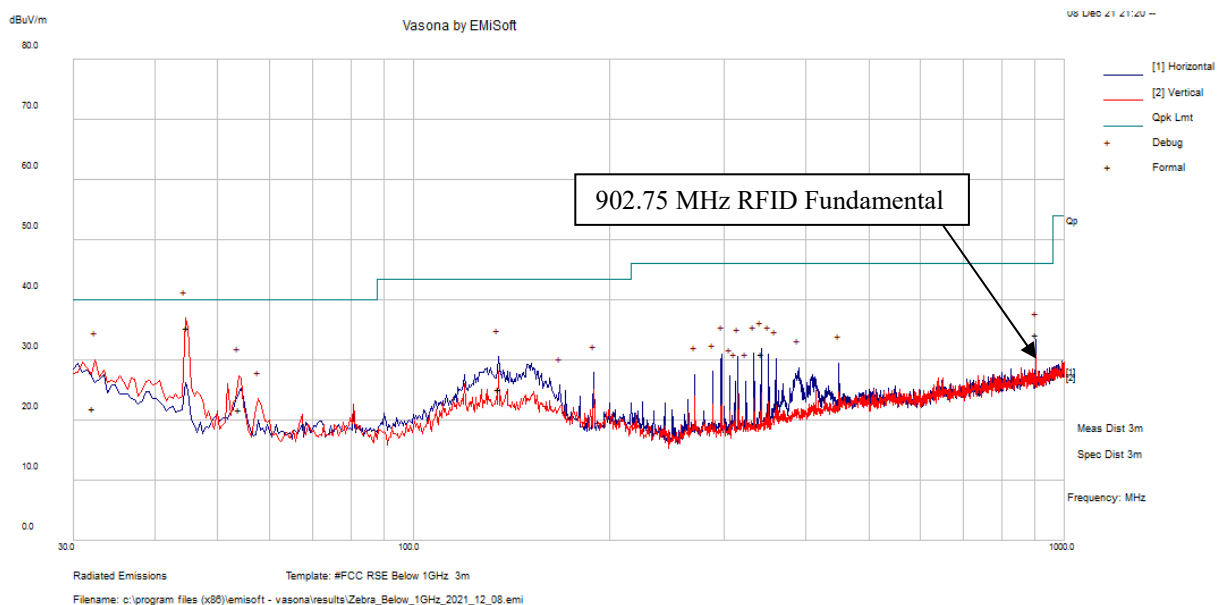
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Comment
30.95075	41.69	1.79	30.45	108	V	320	40	-9.55	QP
53.319	36.99	-11.26	15.24	180	H	21	40	-24.76	QP
38.54	26.39	-4.08	22.76	177	V	337	40	-17.24	QP
359.9853	25.75	-3.17	31.83	101	H	48	46	-14.17	QP
315.002	37.46	-4.21	33.71	105	H	85	46	-12.29	QP
333.0025	36.4	-4.00	32.78	100	H	232	46	-13.22	QP

BT5 + RFID Colocation

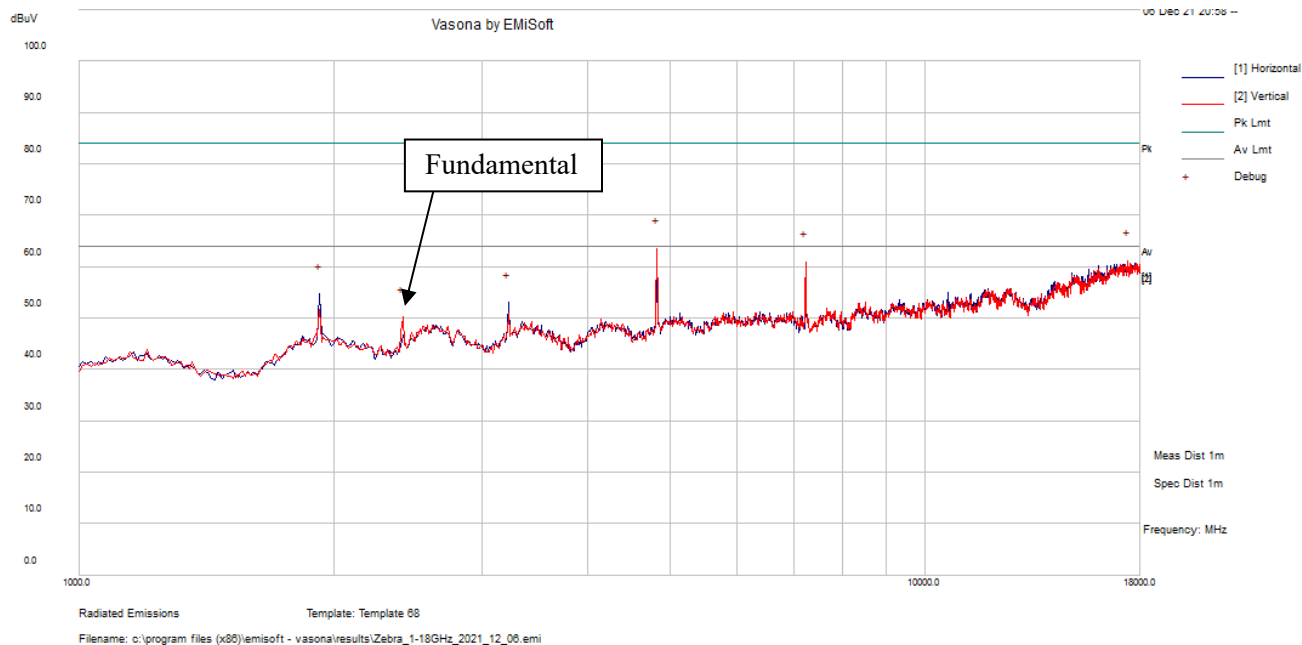


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Comment
52.64	26.59	-11.17	15.42	151	H	320	40	-24.58	QP
30.99	26.00	1.76	27.77	171	V	21	40	-12.23	QP
40.89	27.10	-5.90	21.21	217	V	337	40	-18.79	QP
315.01	34.09	-4.21	29.88	140	H	48	46	-16.12	QP
55.44	25.34	-11.39	13.95	165	H	85	46	-26.05	QP
188.98	37.16	-6.81	30.35	142	H	232	43.5	-13.15	QP

5 GHz Wi-Fi + RFID Colocation

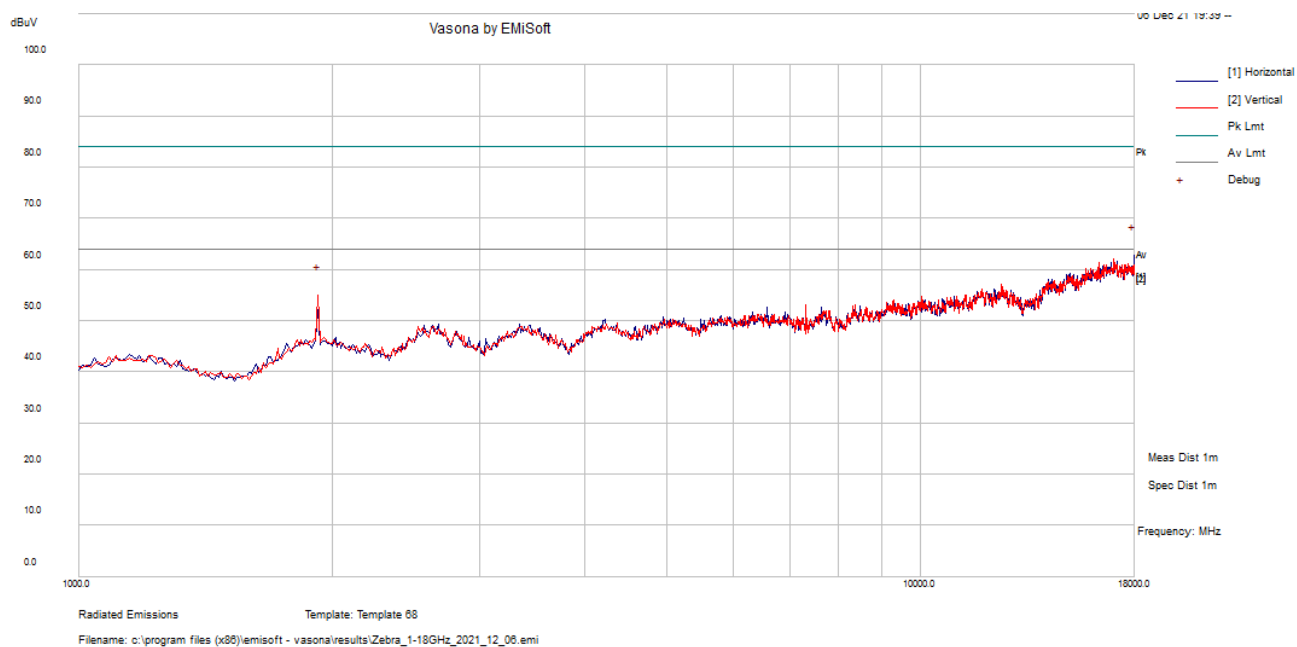


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comments (PK/QP/Ave.)
44.947	43.95	-8.53	35.43	102	V	274	40	-4.57	QP
32.17625	21.18	0.74	21.92	293	V	91	40	-18.08	QP
53.9115	33.04	-11.38	21.66	152	V	29	40	-18.34	QP
902.732	29.28	4.84	34.13	139	H	353	46	-11.87	QP
134.97675	30.02	-4.86	25.15	141	V	256	43.5	-18.35	QP
342.02075	34.85	-3.89	30.95	117	H	252	46	-15.05	QP

1 GHz – 18 GHz Worst Case, Measured at 1 meters**2.4 GHz Wi-Fi + RFID Colocation**

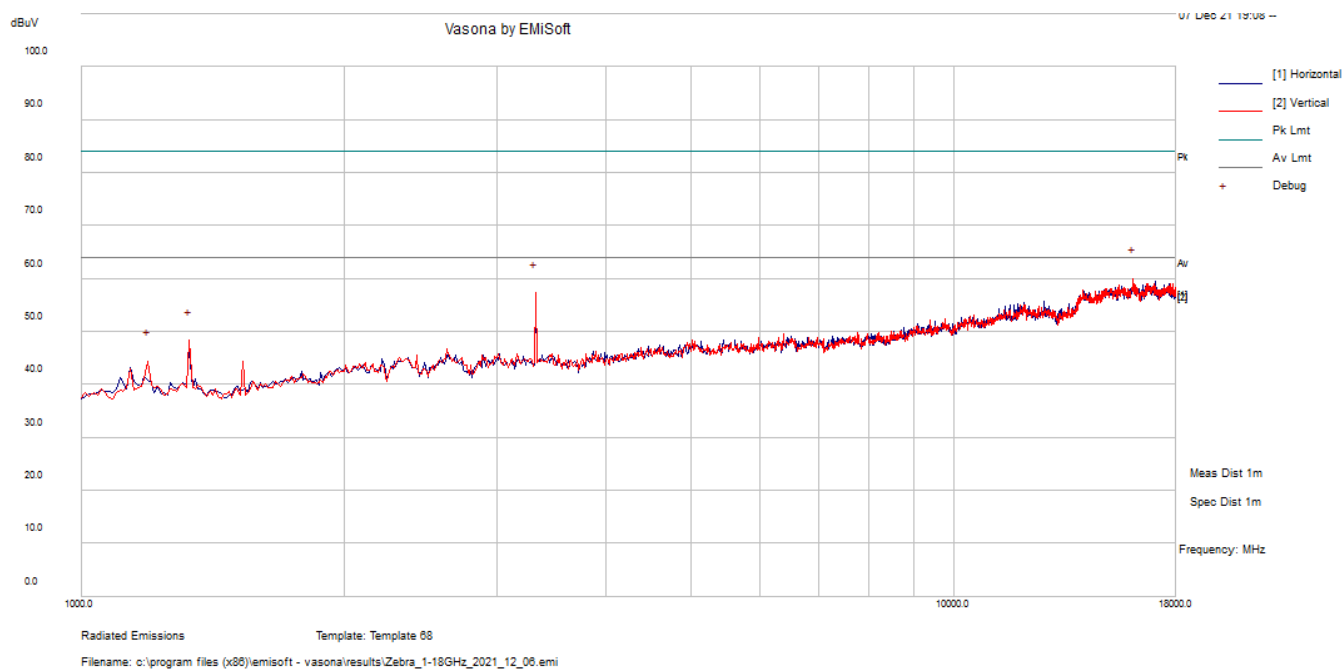
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Detector (Peak /Ave.)
1923.850	59.88	-5.54	54.34	V	100	0	64	-9.66	Ave
3237.162	56.51	-3.44	53.07	V	150	185	64	-10.93	Ave
4825.156	63.69	0.16	63.85	V	135	160	64	-0.31	Ave
7237.512	59.23	2.56	61.79	V	132	155	64	-2.21	Ave
17961.052	47.69	12.75	60.44	H	100	0	64	-3.56	Ave

BT5 + RFID Colocation



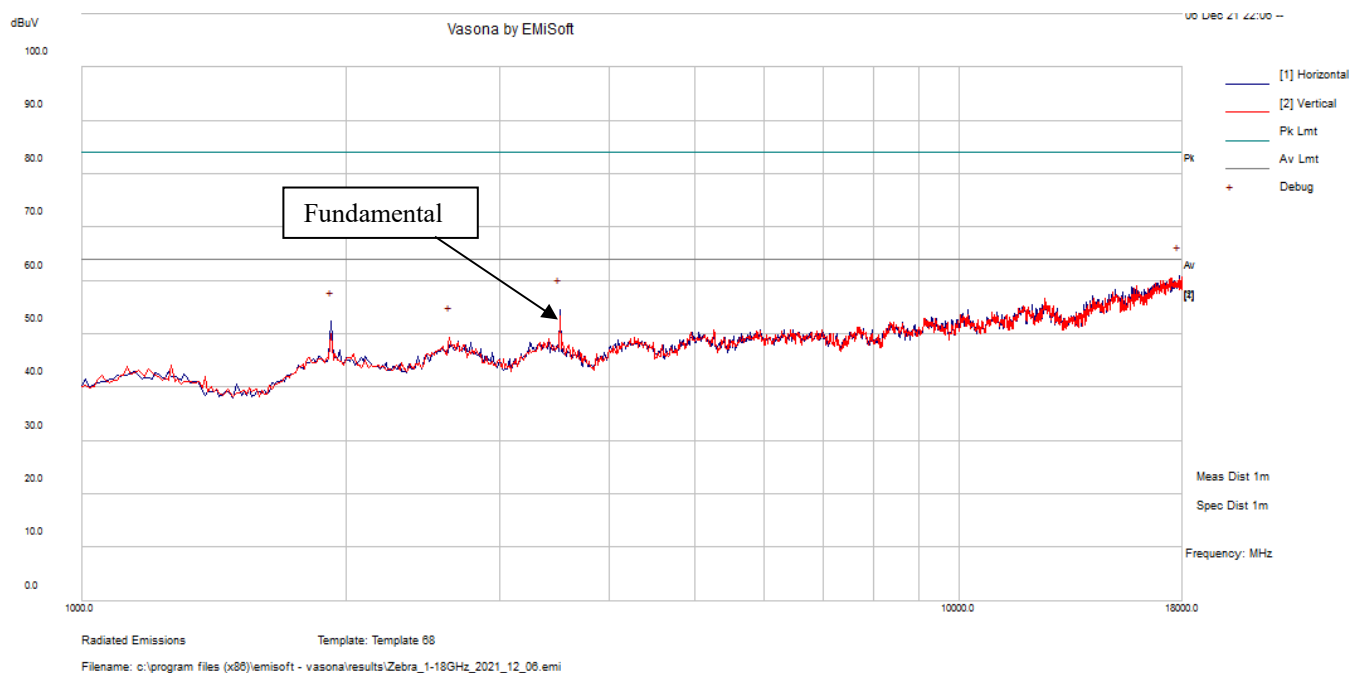
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
17968.125	50.04	12.75	62.79	H	100	0	64	-1.21	Ave
1924.375	60.51	-5.54	54.97	V	100	0	64	-9.03	Ave

Bluetooth + RFID Colocation



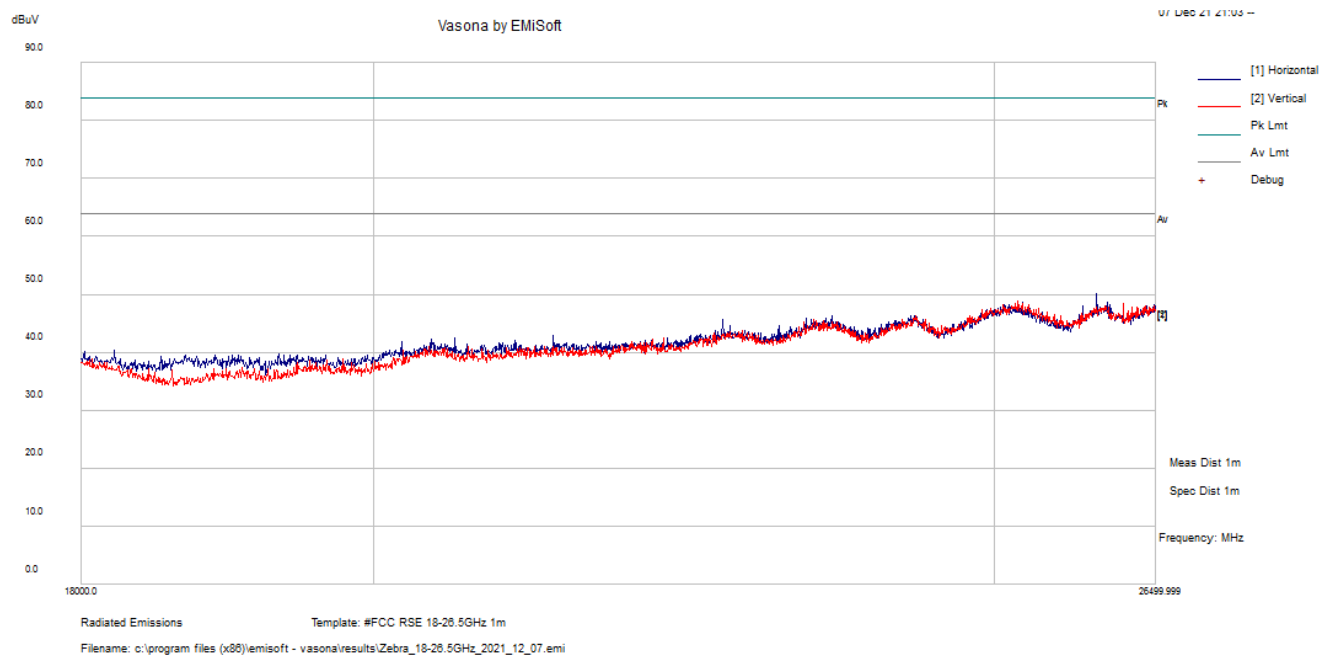
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
16087.5	48.02	12	60.02	V	200	0	64	-3.98	Ave
3316.25	59.08	-1.85	57.23	V	100	0	64	-6.77	Ave
1329.375	57.41	-9.09	48.32	V	300	0	64	-15.69	Ave
1191.25	54.21	-9.89	44.32	V	100	0	64	-19.68	Ave

5 GHz Wi-Fi + RFID Colocation



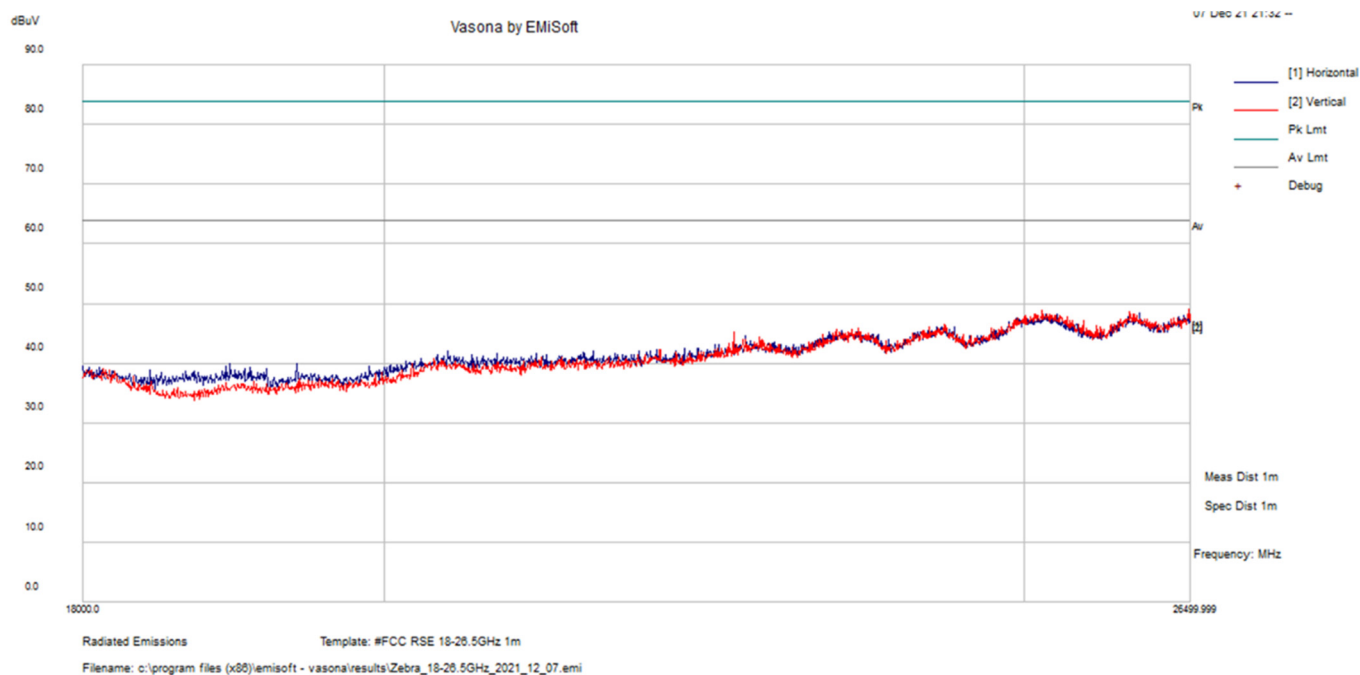
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
17840.625	47.95	12.84	60.79	H	300	0	64	-3.21	Ave
3507.5	56.2	-1.61	54.59	H	100	0	64	-9.41	Ave
1924.375	57.84	-5.54	52.3	H	100	0	64	-11.7	Ave
2625.625	52.15	-2.84	49.31	V	200	0	64	-14.69	Ave

Note: 1 GHz to 18 GHz plots show Peak/Max Hold traces held for worst-case configurations. These traces are compared to applicable Average Limit to show compliance.

18 GHz – 26.5 GHz Worst Case, Measured at 1 meter**2.4 GHz Wi-Fi + RFID Colocation**

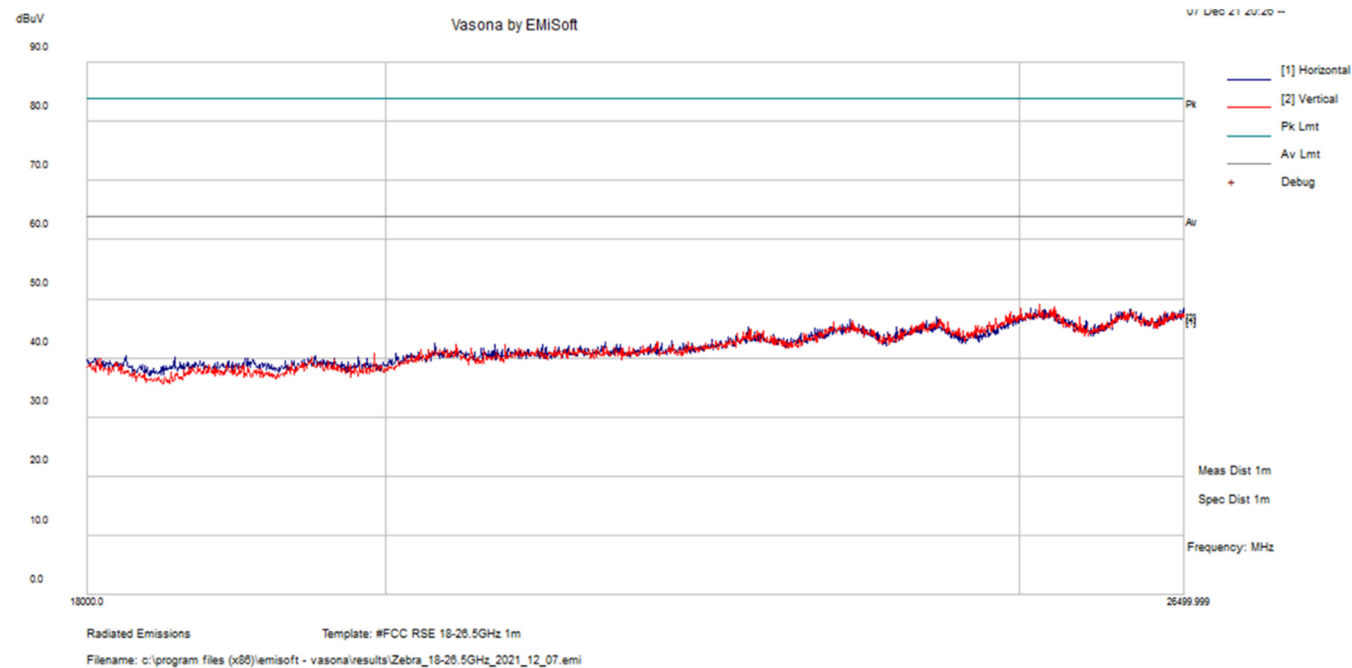
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
26152.52	36.939	13.141	50.08	H	0	200	64	-13.92	Ave

BT5 + RFID Colocation

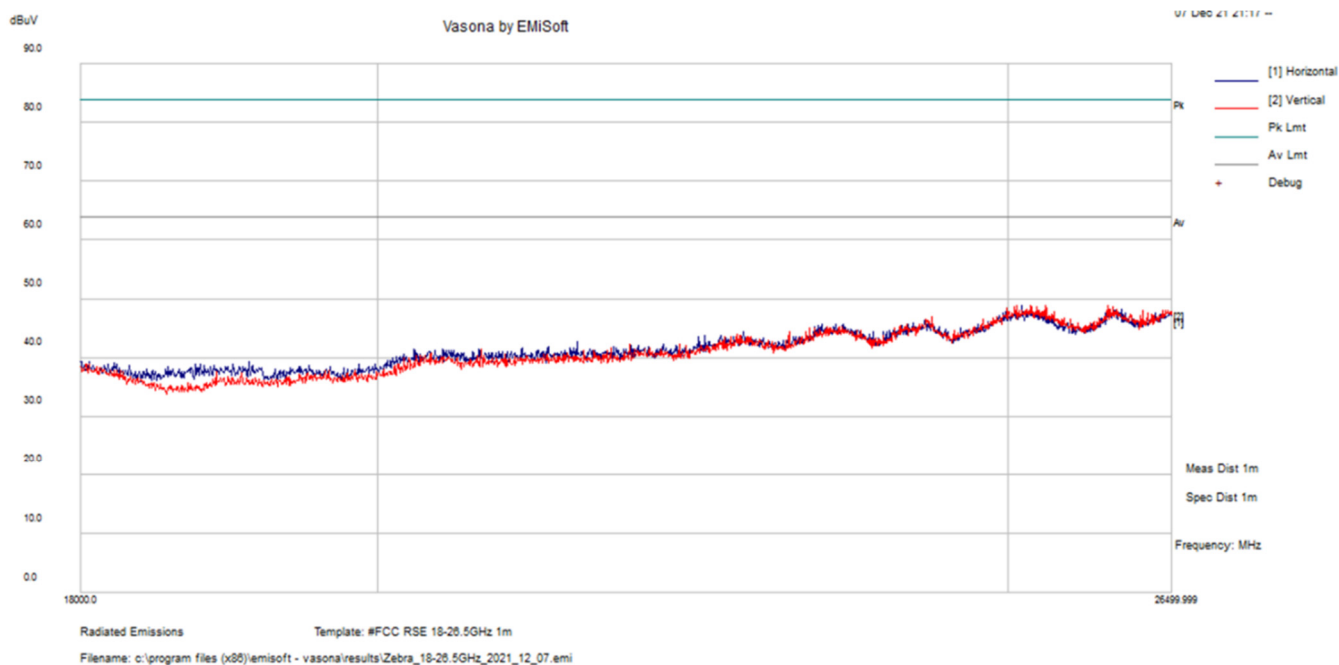


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
26259.64	35.419	13.141	48.56	H	0	200	64	-21.44	Ave

Bluetooth + RFID Colocation



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
26260.55	35.365	13.141	48.506	H	0	200	64	-15.494	Ave

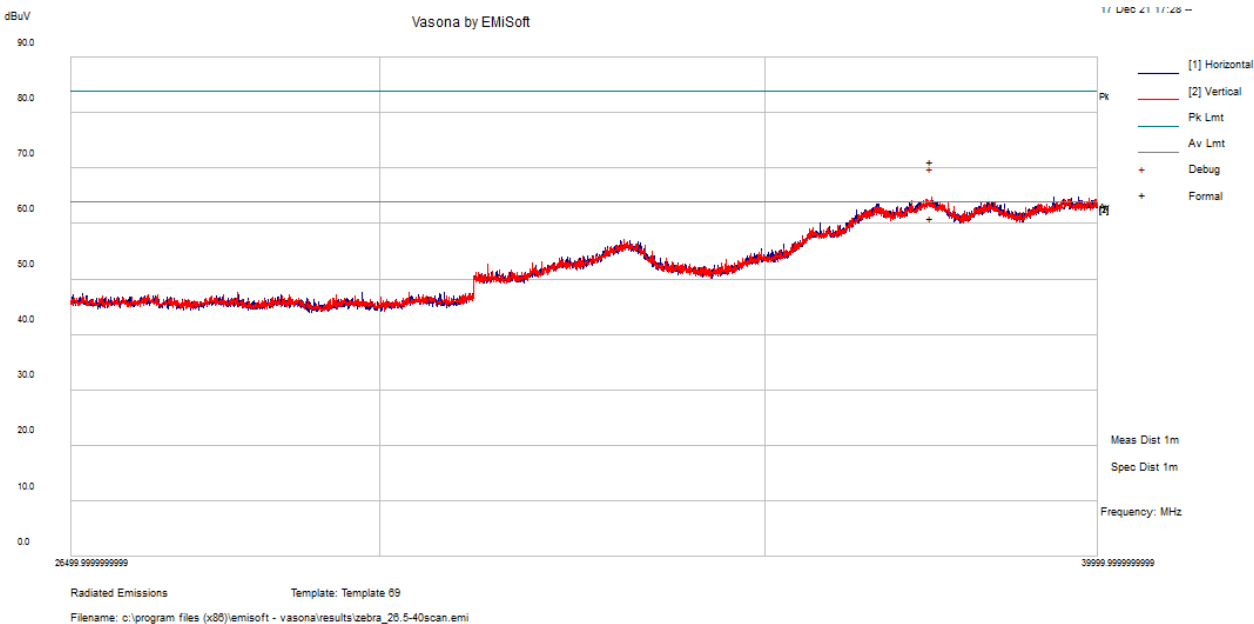
18-26.5 GHz Worst Case, Measured at 1 meter**5 GHz Wi-Fi + RFID Colocation**

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBuV/m)	Margin (dB)	Detector (Peak /Ave.)
26261.15	35.955	13.141	49.096	H	0	200	64	-14.904	Ave

Note: 18 GHz to 26.5 GHz plots show Peak/Max Hold traces held for worst-case configurations. These traces are compared to applicable Average Limit to show compliance.

26.5-40 GHz Worst Case, Measured at 1 meter

5 GHz Wi-Fi + RFID Colocation



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Ant. Polarity (H/V)	Ant. Height (cm)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector (Peak /Ave.)
37418.05	54.42	16.8	71.22	V	172	63	84	-12.78	Peak
37418.05	44.25	16.8	61.05	V	172	63	64	-2.95	Ave

Note: 26.5 GHz to 40 GHz plots show Peak/Max Hold traces held for worst-case configurations. These traces are compared to applicable Average Limit to show compliance.

8 Annex A (Normative) - EUT Test Setup Photographs

Please refer to the attachment

9 Annex B (Normative) – Host Device Photographs

Please refer to the attachment

10 Annex C (Normative) - A2LA Electrical Testing Certificate**Accredited Laboratory**

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 *General requirements for the competence of testing and calibration laboratories*. This laboratory also meets A2LA R222 - *Specific Requirements EPA ENERGY STAR Accreditation Program*. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).

Presented this 10th day of March 2021.

A blue ink signature of Trace McInturff.

Trace McInturff, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2022

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---