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December 9, 2014

William Anderson  
TowMate  
15827 Serenity Point Lane  
Rogers, Arkansas 72756

Mr. Anderson:

Thank you for allowing Professional Testing (EMI), Inc. an opportunity to perform testing for TowMate. Enclosed is the Wireless Certification Report for the 4L-3600-4. This report can be used to demonstrate compliance with the regulatory requirements for wireless devices in North America.

If you have any questions, please contact me.

Sincerely,

Jeffrey A. Lenk  
President

Attachment

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Project 16162-15

**Model 4L-3600-4**

**Wireless Certification Report**

Prepared for:

TowMate  
15827 Serenity Point Lane  
Rogers, Arkansas 72756  
By

Professional Testing (EMI), Inc.  
1601 North A.W. Grimes Blvd., Suite B  
Round Rock, Texas 78665

December 9, 2014

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Reviewed by



Larry Finn  
Chief Technology Officer

Written by



Eric Lifsey  
Test Engineer

**Revision History**

Revision Number	Description	Date
00	Initial draft.	2014-12-01
01	Final. Revised with client and internal comments.	2014-12-08
02	Final. Revised to remove modular references.	2015-01-09

## Table of Contents

Revision History .....	3
Certificate of Compliance .....	5
1.0 Introduction .....	6
1.1 Scope .....	6
1.2 EUT Description .....	6
1.3 EUT Operation .....	6
1.4 Modifications to Equipment .....	6
1.5 Radiated Measurement Calculation .....	6
2.0 Applicable Documents and Clauses .....	7
2.1 Test Site .....	7
3.0 Fundamental Field Strength .....	8
3.1 Test Procedure .....	8
3.2 Test Criteria .....	8
3.3 Test Results .....	8
4.0 Transmitter Duty Cycle and Shutoff Time .....	9
4.1 Test Procedure .....	9
4.2 Test Criteria .....	9
4.3 Test Results .....	9
4.3.1 Transmitter On Time .....	10
4.3.2 Transmitter On Time .....	11
5.0 Occupied Bandwidth .....	12
5.1 Test Procedure .....	12
5.2 Test Criteria .....	12
5.3 Test Results .....	12
5.3.1 Bandwidth Plot .....	13
6.0 Radiated Spurious Emissions Below 1 GHz .....	14
6.1 Test Procedure .....	14
6.2 Test Criteria .....	14
6.3 Test Results .....	14
6.3.1 Receive Mode, Vertical Polarity .....	15
6.3.2 Receive Mode, Horizontal Polarity .....	16
6.3.3 Transmit Mode, Vertical Polarity .....	17
6.3.4 Transmit Mode, Horizontal Polarity .....	18
7.0 Radiated Spurious Emissions Above 1 GHz .....	19
7.1 Test Procedure .....	19
7.2 Test Criteria .....	19
7.3 Test Results .....	19
7.3.1 Receive Mode, Vertical Polarity .....	20
7.3.2 Receive Mode, Horizontal Polarity .....	21
7.3.3 Transmit Mode, Vertical Polarity .....	22
7.3.4 Transmit Mode, Horizontal Polarity .....	23
8.0 Antenna Construction Requirements .....	24
8.1 Procedure .....	24
8.2 Criteria .....	24
8.3 Results .....	24
9.0 Equipment Lists .....	25
9.1 Equipment for Fundamental Power and Spurious Radiated Emissions .....	25
9.2 Equipment for Timings and Bandwidth .....	26
Appendix: Policy, Rationale, and Evaluation of EMC Measurement Uncertainty .....	27
End of Report .....	29

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# Certificate of Compliance

Applicant	Device & Test Identification
TowMate (William Anderson) 15827 Serenity Point Lane Rogers, Arkansas 72756 Certificate Date: December 2, 2014	FCC ID: UZVTM500 Industry Canada ID: Not Applicable Model(s): 4L-3600-4 Laboratory Project ID: 16162-15

The device model(s) listed above were tested utilizing the following documents and found to be in compliance with the required criteria.

47 CFR (USA)   Industry Canada RSS-210 & RSS-Gen	
Section Reference FCC   IC	Parameter
15.231(a)   RSS-210 Is. 8 A1.1, Table A	Fundamental Field Strength
15.231(a)   RSS-210 Is. 8 A1.1, Table A	Harmonic & Spurious Emissions
15.231(a)(1)   RSS-210 Is. 8 A1.1.1	Maximum Transmit Time
15.231(c)   RSS-210 Is. 8 A1.1.3	Bandwidth
15.203   RSS-Gen Is. 3	Antenna Requirements

I, Eric Lifsey, for Professional Testing (EMI), Inc., being familiar with the above rules and test procedures have reviewed the test setup, measured data, and this report. I believe them to be true and accurate.

Eric Lifsey  
EMC Engineer

This report has been reviewed and accepted by the Applicant. The undersigned is responsible for ensuring that this device will continue to comply with the rules listed above.

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Representative of Applicant

## 1.0 Introduction

### 1.1 Scope

This report describes the extent to which the equipment under test (EUT) conformed to the intentional radiator requirements of North America.

Professional Testing (EMI), Inc., (PTI) follows the guidelines of National Institute of Standards and Technology (NIST) for all uncertainty calculations, estimates, and expressions thereof for electromagnetic compatibility testing. The procedures of ANSI C63.4: 2009 were used for making all radiated enclosure and mains emission measurements.

### 1.2 EUT Description

This device is part of a wireless extension of the rear signal lights of a towing vehicle. It will be used in multiple products by the manufacturer on a limited-modular basis; it is not intended for sale to other parties.

**Table 1.2.1: Equipment Under Test**

Manufacturer	Model	Serial #	Description
TowMate	4L-3600	Sample B Green Dot	Transmitter

The device is composed of an approximately square circuit board 3.3 x 4.3 cm and typically housed in a rigid plastic case or in a plastic connector of the style used to connect a towed vehicle to the towing vehicle. As tested it was circuit board only.

In operation the device is activated/powered by the usual rear signal lights from the towing vehicle and transmits this information to a separate device attached to the towed vehicle and replicates the light signals for other traffic to observe. When no vehicle lamps are powered, the transmitter is also not powered.

### 1.3 EUT Operation

The EUT was exercised in a manner consistent with normal operations.

### 1.4 Modifications to Equipment

The EUT transmit power was reduced, and duty cycle extended, during the performance of the test program.

### 1.5 Radiated Measurement Calculation

<b>Raw Measured Level + Antenna Factor + Cable Losses – Amplifier Gain = Corrected Level</b>
--

## 2.0 Applicable Documents and Clauses

Table 2.0.1: Applicable Documents	
Document	Title/Description
47 CFR (USA)	Part 15 – Section 15.231
ANSI C63.4 2009	American National Standard for Methods of Measurement of Radio-Noise Emissions from Low Voltage Electrical and Electronic Equipment
RSS-Gen Issue 3	General Requirements and Information for the Certification of Radio Apparatus
RSS-210 Issue 8	Licence-exempt Radio Apparatus (All Frequency Bands): Category I Equipment

Table 2.0.2: Applicable Clauses	
47 CFR (USA)   Industry Canada RSS-210 & RSS-Gen	
Section Reference FCC   IC	Parameter
15.231(a)   RSS-210 A1.1, Table A	Fundamental Field Strength
15.231(a)   RSS-210 A1.1, Table A	Harmonic & Spurious Emissions
15.231(a)(1)   RSS-210 A1.1.1	Maximum Transmit Time
15.231(c)   RSS-210 A1.1.3	Bandwidth
15.203   RSS-Gen	Antenna Requirements

Table 2.0.3: Supplemental Statements		
Section Number FCC	Clause Subject	Statement
Section Number IC		
FCC 15.231(a)(3)	Periodic Transmissions	The EUT makes no periodic transmission and is strictly activated by the vehicle lighting/indicator including brake and turn signals. Transmission only occurs while the lights are engaged and ceases immediately when light power is removed.
RSS-210 A1.1.1(c)		

### 2.1 Test Site

Measurements were made at the PTI semi-anechoic facility designated Site 45 (FCC 459644, IC 3036B-1) in Austin, Texas. The site is registered with the FCC under Section 2.948 and Industry Canada per RSS-GEN, and is subsequently confirmed by laboratory accreditation (NVLAP). The test site is located at 11400 Burnet Road, Austin, Texas 78758, while the main office is located at 1601 North A.W. Grimes Boulevard, Suite B, Round Rock, Texas, 78665.

### 3.0 Fundamental Field Strength

#### 3.1 Test Procedure

EUT is placed on a non-conductive surface 80 cm above a reference plane and measurements of emissions are made to find maximum emission level.

#### 3.2 Test Criteria

Section Reference FCC   IC	Parameter	Date(s)
15.231(a)   RSS210 A1.1	Radiated Output Power, 10,333.33 $\mu$ V/m @ 3 m Restated as 80.28 dB $\mu$ V/m @ 3 m Or extrapolated as 69.8 dB $\mu$ V/m @ 10 m	2014-11-16

#### 3.3 Test Results

Table 3.3.1: Field Strength at 10 Meters			
Frequency MHz	Antenna Polarity	Corrected Level (Measured Peak Level) dB $\mu$ V/m	Detector Mode
418	V	72.9	Peak
418	H	77.1	Peak

Resolution bandwidth 120 kHz. Video bandwidth 120 kHz. Detector mode is peak.

Duty cycle is such that the emission average level is calculated as 20 dB below the peak level.

Table 3.3.2: Corrected Field Strength				
Limit At 10 meters dB $\mu$ V/m (Average Detection)	Corrected Level (Measured Peak Level) dB $\mu$ V/m	Duty Cycle Factor dB	Corrected Level dB $\mu$ V/m	Margin dB
69.8	77.1	20	57.1	-12.7

The EUT was found to be in compliance with the applicable criteria.



## 4.0 Transmitter Duty Cycle and Shutoff Time

### 4.1 Test Procedure

EUT is placed into normal transmit operation to observe and record transmitter time domain performance.

### 4.2 Test Criteria

Measurement is based on intervals not to exceed 100 msec. Maximum transmitter on time is divided by the lesser of 100 msec or the actual measured minimum transmitter interval time. The result is converted to dB and applied as needed to peak measurements of transmitter artifacts to determine average power. This is not a pass/fail measurement.

Section Reference FCC   IC	Parameter	Date(s)
15.231(a)(1)   RSS210 A1.1.1	Maximum Transmit Time	2014-09-16 2014-10-14

### 4.3 Test Results

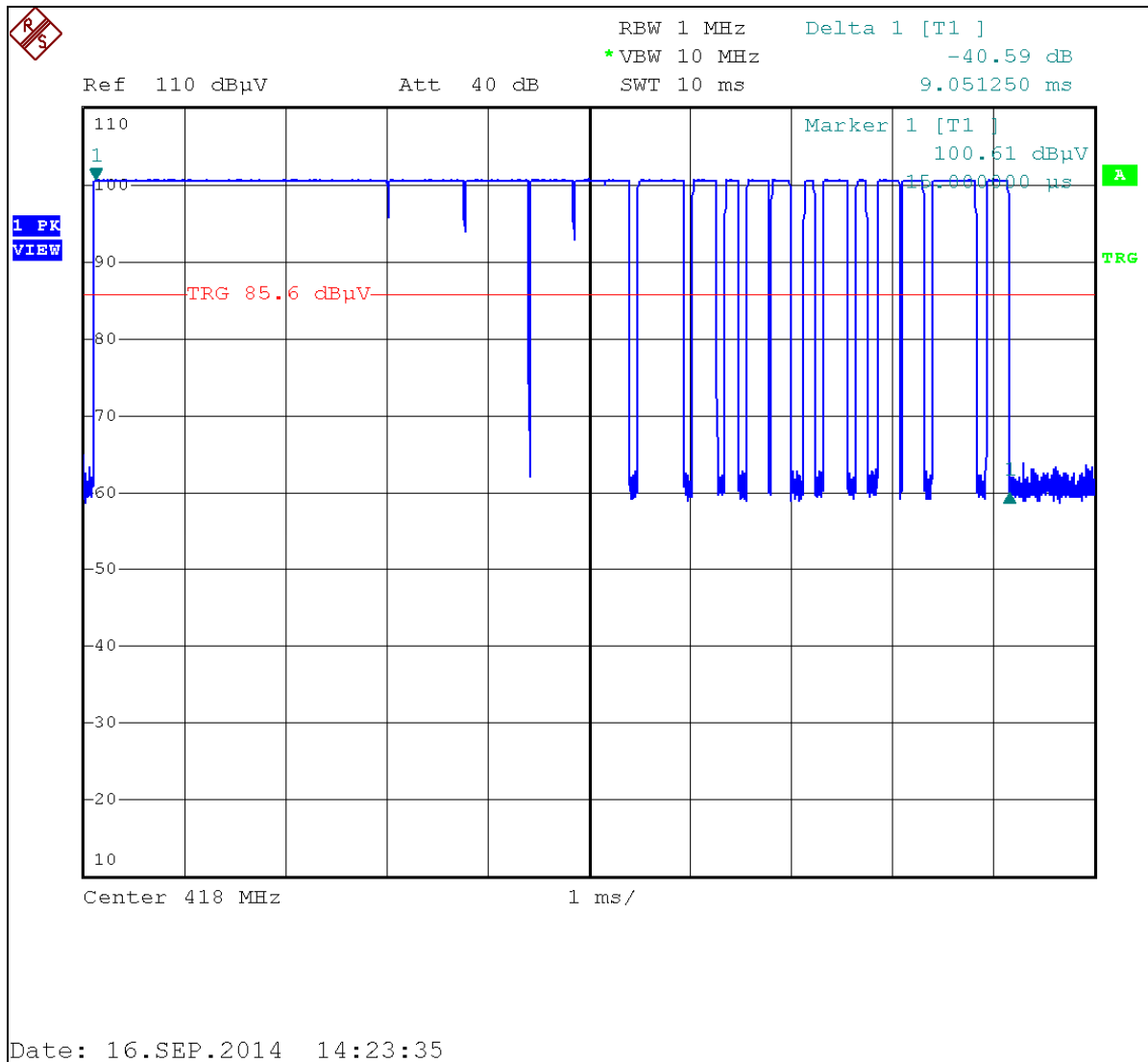
Table 4.3.1 Duty Cycle Results and Average Duty Cycle Factor Result				
Measured On Time (msec)	Measured Time Interval (msec)	Duty Cycle Factor Calculation	Result (dB)	Duty Cycle Factor Allowed (dB)
9.0513	91.4438	$= 20 * \log_{10} ( 9.0513 \text{ msec} / 91.4438 \text{ msec} )$	-20.08	-20

Table 4.3.2 Exposure Source Duty Cycle Results				
Measured On Time (msec)	Measured Time Interval (msec)	Exposure Duty Cycle Factor Calculation	Result (dB)	Duty Cycle Factor Allowed (dB)
9.0513	91.4438	$= 10 * \log_{10} ( 9.0513 \text{ msec} / 91.4438 \text{ msec} )$	-10.04	-10.04

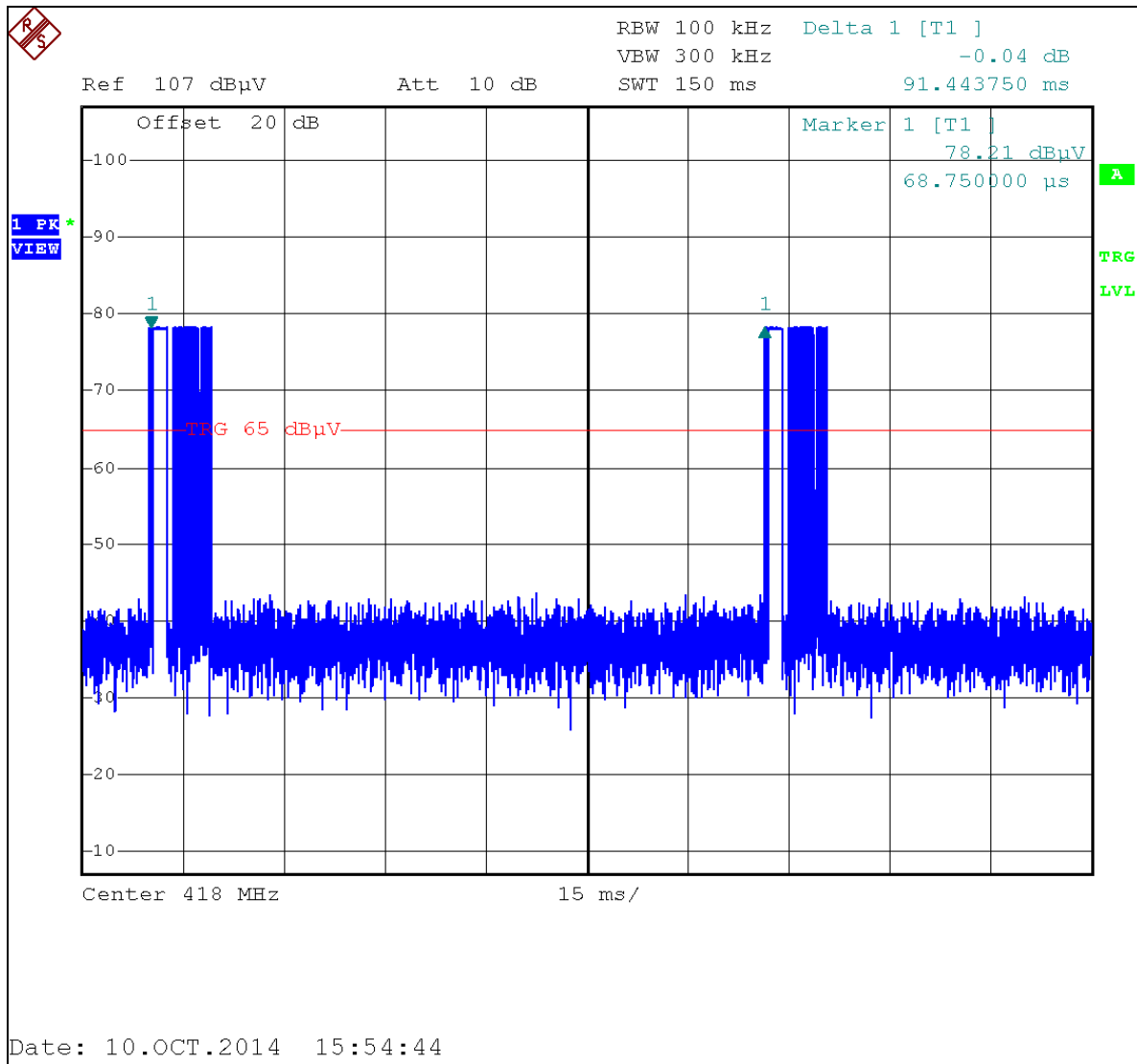
Table 4.3.3: Maximum Transmit Shutoff Time, Limit and Measured	
Limit Transmit Time	Maximum Measured Transmit Time
5 seconds	Immediate cessation as all power is removed, no measurement required.

See plotted results of duty cycle time appear below.

### 4.3.1 Transmitter On Time



### 4.3.2 Transmitter On Time



## 5.0 Occupied Bandwidth

### 5.1 Test Procedure

The EUT is configured for best signal/power and the bandwidth then is measured. A recording of the results is included.

### 5.2 Test Criteria

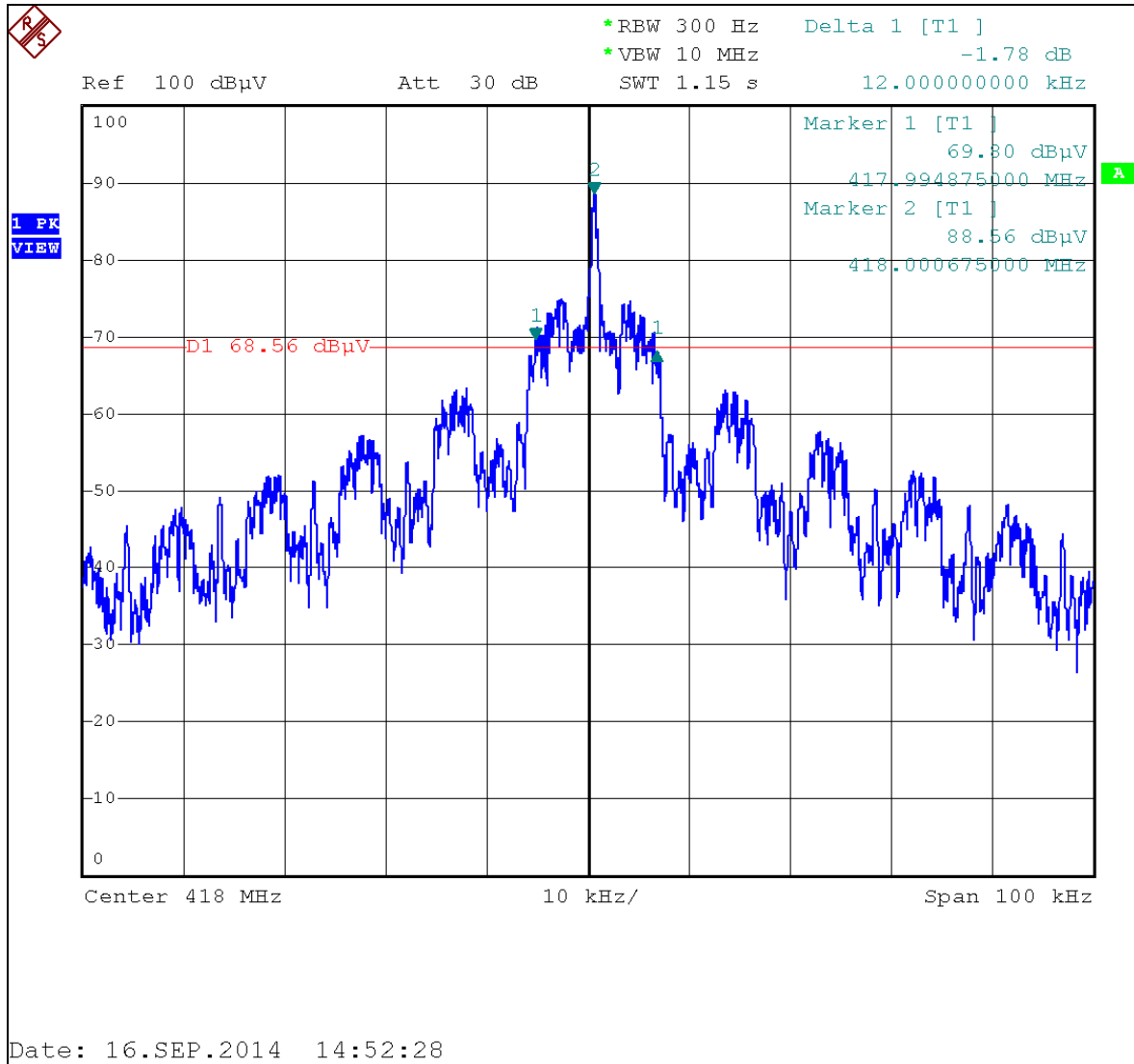
Section Reference FCC IC	Parameter	Date(s)
15.231(c), 2.1049   RSS210 A1.1.3	Bandwidth, 20 dB	2014-09-16

### 5.3 Test Results

Table 5.3.1: Bandwidth Limit and Measurement	
<b>Limit</b> <b>15.231(c) 20 dB BW</b> <b>For Fundamental = 418 MHz</b> <b>0.25% of Fundamental</b> <b>kHz</b>	<b>Measured BW 20 dB</b> <b>kHz</b>
1045	12.0

EUT was found to be in compliance with applicable requirements.

### 5.3.1 Bandwidth Plot

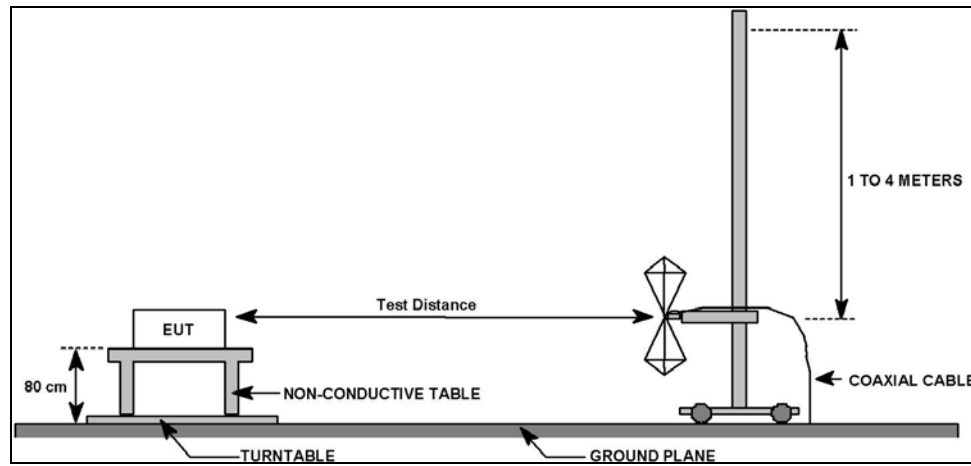


## 6.0 Radiated Spurious Emissions Below 1 GHz

### 6.1 Test Procedure

The EUT was placed on a non-conductive table 0.8 meters above the ground plane. The table was centered on a rotating turntable at a distance of 10 meters from the measurement antenna.

Spurious emissions below 1 GHz were measured with quasi-peak detection with a resolution bandwidth of 120 kHz. A diagram showing the test setup is given in the figure below.



**Field Strength of Spurious Emissions Test Setup**

### 6.2 Test Criteria

Section Number FCC   IC	Clause Subject	Date
15.231(a), 15.209   RSS-210 A1.1 Table A	Field Strength of Radiated Spurious/Harmonic Emissions	2014-09-21 2014-11-16

### 6.3 Test Results

The fundamental signal also appears in the measurements taken.

The EUT satisfied the criteria. Recorded data is presented below.

## 6.3.1 Receive Mode, Vertical Polarity

Professional Testing, EMI, Inc.										
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).								
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits								
<b>Section:</b>		15.209								
<b>Test Date(s):</b>		9/21/2014			<b>EUT Serial #:</b>		None			
<b>Customer:</b>		4L-Design Towmate			<b>EUT Part #:</b>		None			
<b>Project Number:</b>		16162-15			<b>Test Technician:</b>		Eric Lifsey			
<b>Purchase Order #:</b>		Not Listed			<b>Supervisor:</b>		Lisa Arndt			
<b>Equip. Under Test:</b>		4L-3600-4			<b>Witness' Name:</b>		None			
Radiated Emissions Test Results Data Sheet							Page: 1 of 1			
<b>EUT Line Voltage:</b>		12 VDC		<b>EUT Power Frequency:</b>		- N/A				
<b>Antenna Orientation:</b>		Vertical			<b>Frequency Range:</b>		30MHz to 1GHz			
EUT Mode of Operation:					Receive Mode					
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results	
30.3357	10	74	3.78	Quasi-peak	24	12.786	29.5	-16.7	Pass	
156.007	10	308	1.79	Quasi-peak	33.5	14.071	33.1	-19.0	Pass	
208.018	10	229	1.68	Quasi-peak	35	18.576	33.1	-14.5	Pass	
286.007	10	332	1.18	Quasi-peak	32.4	18.504	35.6	-17.1	Pass	
897.592	10	351	2.36	Quasi-peak	21.4	21.092	35.6	-14.5	Pass	
980.215	10	242	2.96	Quasi-peak	21.1	21.883	43.5	-21.6	Pass	

**Professional Testing, EMI, Inc**  
Radiated Emissions, 10m Distance  
30MHz- 1GHz Vertical Polarity Measured Emissions

Operator: Eric Lifsey  
16162-RERun02-RxModeMHzGHz.tif  
01:19:28 PM, Sunday, September 21, 2014

Frequency

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design TowMate

**≤ 1GHz Vertical Antenna Polarity Measured Emissions**

## 6.3.2 Receive Mode, Horizontal Polarity

Professional Testing, EMI, Inc.									
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).							
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits							
<b>Section:</b>		15.209							
<b>Test Date(s):</b>		9/21/2014		<b>EUT Serial #:</b>		None			
<b>Customer:</b>		4L-Design Towmate		<b>EUT Part #:</b>		None			
<b>Project Number:</b>		16162-15		<b>Test Technician:</b>		Eric Lifsey			
<b>Purchase Order #:</b>		Not Listed		<b>Supervisor:</b>		Lisa Arndt			
<b>Equip. Under Test:</b>		4L-3600-4		<b>Witness' Name:</b>		None			
<b>Radiated Emissions Test Results Data Sheet</b>								Page: 1 of 1	
<b>EUT Line Voltage:</b>		12 VDC		<b>EUT Power Frequency:</b>		- N/A			
<b>Antenna Orientation:</b>		Horizontal		<b>Frequency Range:</b>		30MHz to 1GHz			
<b>EUT Mode of Operation:</b>				<b>Receive Mode</b>					
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results
31.0163	10	83	2.46	Quasi-peak	24.2	12.659	29.5	-16.8	Pass
208.007	10	243	3.71	Quasi-peak	35.4	18.998	33.1	-14.1	Pass
286.012	10	251	2.83	Quasi-peak	35.7	21.824	35.6	-13.8	Pass
299.003	10	230	2.29	Quasi-peak	35.2	21.744	35.6	-13.9	Pass
724.303	10	148	1.43	Quasi-peak	21.8	18.025	35.6	-17.6	Pass
901.847	10	80	2.54	Quasi-peak	21.2	21.007	35.6	-14.6	Pass

**Professional Testing, EMI, Inc**  
Radiated Emissions, 10m Distance  
30 MHz - 1 GHz Horizontal Polarity Measured Emissions

Operator: Eric Lifsey  
16162 RERun02 Rx Mode MHz GHz till  
01:19:28 PM, Sunday, September 21, 2014

Frequency

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design TowMate

**≤ 1GHz Horizontal Antenna Polarity Measured Emissions**



## 6.3.3 Transmit Mode, Vertical Polarity

Professional Testing, EMI, Inc.									
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).							
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits							
<b>Section:</b>		15.209							
<b>Test Date(s):</b>		11/16/2014			<b>EUT Serial #:</b>		Sample B.GreenDot		
<b>Customer:</b>		4L-Design Towmate			<b>EUT Part #:</b>		None		
<b>Project Number:</b>		16162-15			<b>Test Technician:</b>		Eric Lifsey		
<b>Purchase Order #:</b>		Not Listed			<b>Supervisor:</b>		Lisa Arndt		
<b>Equip. Under Test:</b>		4L-3600-4			<b>Witness' Name:</b>		None		
<b>Radiated Emissions Test Results Data Sheet</b>								Page: 1 of 1	
<b>EUT Line Voltage:</b>		12 VDC			<b>EUT Power Frequency:</b>		- N/A		
<b>Antenna Orientation:</b>		Vertical			<b>Frequency Range:</b>		30MHz to 1GHz		
<b>EUT Mode of Operation:</b>					<b>Transmit Mode, Unmodulated, Fund &amp; Spur</b>				
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results
418	10	0	4	Peak	72.9	72.9	89.8	-16.9	Pass
836	10	0	4	Peak	53	53	80.2	-27.2	Pass
418	10	0	4	average	72.9	52.9	69.8	-16.9	Pass
836	10	0	4	average	53	33	60.2	-27.2	Pass

**Professional Testing, EMI, Inc**  
Radiated Emissions, 10m Distance  
30MHz - 1GHz Vertical Polarity Measured Emissions

Operator: Eric Lifsey  
16162'RERun04TxModeMHzGHzB-GreenDot.ttl  
11:39:16 AM, Sunday, November 16, 2014

EUT Mode: Transmit, Unmodulated, 418 MHz  
EUT Power: 12 VDC  
Sample B.GreenDot

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design TowMate

**≤ 1GHz Vertical Antenna Polarity Measured Emissions**

## 6.3.4 Transmit Mode, Horizontal Polarity

Professional Testing, EMI, Inc.									
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).							
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits							
<b>Section:</b>		15.209							
<b>Test Date(s):</b>		11/16/2014			<b>EUT Serial #:</b>		Sample B.GreenDot		
<b>Customer:</b>		4L-Design Towmate			<b>EUT Part #:</b>		None		
<b>Project Number:</b>		16162-15			<b>Test Technician:</b>		Eric Lifsey		
<b>Purchase Order #:</b>		Not Listed			<b>Supervisor:</b>		Lisa Arndt		
<b>Equip. Under Test:</b>		4L-3600-4			<b>Witness' Name:</b>		None		
<b>Radiated Emissions Test Results Data Sheet</b>								Page: 1 of 1	
<b>EUT Line Voltage:</b>		12 VDC			<b>EUT Power Frequency:</b>		- N/A		
<b>Antenna Orientation:</b>		Horizontal			<b>Frequency Range:</b>		30MHz to 1GHz		
<b>EUT Mode of Operation:</b>					<b>Transmit Mode, Unmodulated, Fund &amp; Spur</b>				
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results
418	10	0	4	Peak	77.1	77.1	89.8	-12.7	Pass
836	10	0	4	Peak	64.1	64.1	80.2	-16.1	Pass
418	10	0	4	average	77.1	57.1	69.8	-12.7	Pass
836	10	0	4	average	64.1	44.1	60.2	-16.1	Pass

**Professional Testing, EMI, Inc**  
Radiated Emissions, 10m Distance  
30MHz - 1GHz Horizontal Polarity Measured Emissions

Operator: Eric Lifsey  
16162'RERun04TxModeMHzGHzB-GreenDot.ttl  
11:39:16 AM, Sunday, November 16, 2014

EUT Mode: Transmit, Unmodulated, 418 MHz  
EUT Power: 12 VDC  
Sample B.GreenDot

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design TowMate

**≤ 1GHz Horizontal Antenna Polarity Measured Emissions**

## 7.0 Radiated Spurious Emissions Above 1 GHz

### 7.1 Test Procedure

The EUT was placed on a non-conductive table 0.8 meters above the ground plane. The table was centered on a rotating turntable at a distance of 1 meter from the measurement antenna.

Harmonic emissions above 1 GHz peak were measured with peak detection, a resolution bandwidth of 1 MHz, and at a distance of 3 meters. If peak measurements exceeded average limits, the peak limit was applicable and duty cycle factor was then applied for average level calculation. Emissions were investigated up to at least the 10<sup>th</sup> harmonic of the transmitter fundamental.

Non-harmonic spurious emissions must satisfy the average limit and the peak limit (20 dB above average).

### 7.2 Test Criteria

Section Number FCC   IC	Clause Subject	Date
15.231(a), 15.209   RSS-210 A1.1 Table A	Field Strength of Radiated Spurious/Harmonic Emissions	2014-09-21 2014-11-16

### 7.3 Test Results

Emissions were measured in peak detection mode. All recorded emissions were harmonics of the fundamental. For each emission the average duty cycle factor (-20 dB) would apply. Therefore, the emissions must remain under the peak limit of 74 dB $\mu$ V/m to also satisfy the average limit. All emissions remained under the peak limit.

The EUT satisfied the criteria. Recorded data is presented below.

### 7.3.1 Receive Mode, Vertical Polarity

Professional Testing, EMI, Inc.									
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).							
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits							
<b>Section:</b>		15.209							
<b>Test Date(s):</b>		9/21/2014		<b>EUT Serial #:</b>		None			
<b>Customer:</b>		4L-Design Towmate		<b>EUT Part #:</b>		None			
<b>Project Number:</b>		16162-15		<b>Test Technician:</b>		Eric Lifsey			
<b>Purchase Order #:</b>		Not Listed		<b>Supervisor:</b>		Lisa Arndt			
<b>Equip. Under Test:</b>		4L-3600-4		<b>Witness' Name:</b>		None			
Radiated Emissions Test Results Data Sheet								Page: 1 of 1	
<b>EUT Line Voltage:</b>		12 VDC		<b>EUT Power Frequency:</b>		- N/A			
<b>Antenna Orientation:</b>		Vertical		<b>Frequency Range:</b>		Above 1GHz			
EUT Mode of Operation:					Receive Mode				
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results
1002.02	3	279	1	Average	35	21.362	54.0	-32.6	Pass
1255.42	3	80	1	Average	34.4	22.076	54.0	-31.9	Pass
1672.75	3	330	1	Average	35.4	23.775	54.0	-30.2	Pass
2098.68	3	146	1	Average	35.3	25.732	54.0	-28.2	Pass
2517.84	3	65	1	Average	34.5	25.621	54.0	-28.3	Pass

**Professional Testing, EMI, Inc**  
Radiated Emissions, 3m Distance  
1-18 GHz Vertical Polarity Measured Emissions

Operator: Eric Lifsey  
16162-RERun01-RxModeGHZ.tif  
12:00:59 PM, Sunday, September 21, 2014

Frequency

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design Tow Mate

**> 1GHz Vertical Antenna Polarity Measured Emissions**

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.

### 7.3.2 Receive Mode, Horizontal Polarity

Professional Testing, EMI, Inc.									
<b>Test Method:</b>		ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).							
<b>In accordance with:</b>		FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits							
<b>Section:</b>		15.209							
<b>Test Date(s):</b>		9/21/2014		<b>EUT Serial #:</b>		None			
<b>Customer:</b>		4L-Design Towmate		<b>EUT Part #:</b>		None			
<b>Project Number:</b>		16162-15		<b>Test Technician:</b>		Eric Lifsey			
<b>Purchase Order #:</b>		Not Listed		<b>Supervisor:</b>		Lisa Arndt			
<b>Equip. Under Test:</b>		4L-3600-4		<b>Witness' Name:</b>		None			
Radiated Emissions Test Results Data Sheet								Page: 1 of 1	
<b>EUT Line Voltage:</b>		12 VDC		<b>EUT Power Frequency:</b>		- N/A			
<b>Antenna Orientation:</b>		Horizontal		<b>Frequency Range:</b>		Above 1GHz			
EUT Mode of Operation:					Receive Mode				
Frequency Measured (MHz)	Test Distance (Meters)	EUT Direction (Degrees)	Antenna Height (Meters)	Detector Function	Recorded Amplitude (dBμV)	Corrected Level (dBμV/m)	Limit Level (dBμV/m)	Margin (dB)	Test Results
1001.54	3	181	1	Average	35	21.358	54.0	-32.6	Pass
1254.48	3	166	1	Average	34.4	22.074	54.0	-31.9	Pass
1684.1	3	50	1	Average	35.3	23.814	54.0	-30.1	Pass
2092.18	3	285	1	Average	35.2	25.621	54.0	-28.3	Pass
2508.78	3	209	2	Average	34.5	25.592	54.0	-28.4	Pass

**Professional Testing, EMI, Inc**  
Radiated Emissions, 3m Distance  
1-18 GHz Horizontal Polarity Measured Emissions

Operator: Eric Lifsey  
16162-RERun01-RxModeGHz.tif  
12:00:59 PM, Sunday, September 21, 2014

Frequency

EUT: Model 4L-3600-4  
Project Number: 16162-15  
Client: 4L-Design Tow Mate

#### > 1GHz Horizontal Antenna Polarity Measured Emissions

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.

## 7.3.3 Transmit Mode, Vertical Polarity

Professional Testing, EMI, Inc.			
<b>Test Method:</b>	ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).		
<b>In accordance with:</b>	FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits		
<b>Section:</b>	15.209		
<b>Test Date(s):</b>	9/21/2014	<b>EUT Serial #:</b>	None
<b>Customer:</b>	4L-Design Towmate	<b>EUT Part #:</b>	None
<b>Project Number:</b>	16162-15	<b>Test Technician:</b>	Eric Lifsey
<b>Purchase Order #:</b>	Not Listed	<b>Supervisor:</b>	Lisa Arndt
<b>Equip. Under Test:</b>	4L-3600-4	<b>Witness' Name:</b>	None
<b>Radiated Emissions Test Results Data Sheet</b>			Page: 1 of 1
<b>EUT Line Voltage:</b>	12 VDC	<b>EUT Power Frequency:</b>	- N/A
<b>Antenna Orientation:</b>	Vertical	<b>Frequency Range:</b>	Above 1GHz
<b>EUT Mode of Operation:</b>		Transmit Mode, Unmodulated	
<div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p>Professional Testing, EMI, Inc Radiated Emissions, 3m Distance 1-18GHz Vertical Polarity Measured Emissions</p> <p>The graph displays field strength measurements from 1 GHz to 5 GHz. The y-axis ranges from 20 to 90 dBµV/m. A red line at approximately 75 dBµV/m represents the Average Limit Level. A blue line at approximately 55 dBµV/m represents the Peak Limit Level. The measured emissions (blue line) are mostly below the peak limit, with several sharp peaks reaching up to 60 dBµV/m. The average reading (red line) is consistently below the average limit level.</p> </div> <div style="width: 35%;"> <p>— Average Limit Level — Corrected Average Reading — Peak Limit Level — Corrected Peak Reading</p> <p style="text-align: right;"><b>PROFESSIONAL TESTING</b></p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 30%;"> <p>Operator: Eric Lifsey 16162'RERun03'TxMode/MHzGHz.tif 02:33:40 PM, Sunday, September 21, 2014</p> </div> <div style="width: 35%; text-align: center;"> <p>Frequency</p> <p>EUT Mode: Transmit, Unmodulated, 418 MHz EUT Power: 12 VDC HPF</p> </div> <div style="width: 30%; text-align: right;"> <p>EUT: Model 4L-3600-4 Project Number: 16162-15 Client: 4L-Design Tow Mate</p> </div> </div>			
<b>&gt; 1GHz Vertical Antenna Polarity Measured Emissions</b>			

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.

(Note that average duty cycle factor is -20 dB and the peaks shown above result in passing averages.)

### 7.3.4 Transmit Mode, Horizontal Polarity

Professional Testing, EMI, Inc.			
<b>Test Method:</b>	ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38).		
<b>In accordance with:</b>	FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits		
<b>Section:</b>	15.209		
<b>Test Date(s):</b>	9/21/2014	<b>EUT Serial #:</b>	None
<b>Customer:</b>	4L-Design Towmate	<b>EUT Part #:</b>	None
<b>Project Number:</b>	16162-15	<b>Test Technician:</b>	Eric Lifsey
<b>Purchase Order #:</b>	Not Listed	<b>Supervisor:</b>	Lisa Arndt
<b>Equip. Under Test:</b>	4L-3600-4	<b>Witness' Name:</b>	None
<b>Radiated Emissions Test Results Data Sheet</b>			<b>Page:</b> 1 of 1
<b>EUT Line Voltage:</b>	12 VDC	<b>EUT Power Frequency:</b>	- N/A
<b>Antenna Orientation:</b>	Horizontal	<b>Frequency Range:</b>	Above 1GHz
<b>EUT Mode of Operation:</b>		Transmit Mode, Unmodulated	
<div> <div> Professional Testing, EMI, Inc  Radiated Emissions, 3m Distance  1-18 GHz Horizontal Polarity Measured Emissions </div> <div> <p>The graph displays field strength in dBµV/m on the y-axis (ranging from 20 to 90) against frequency in GHz on the x-axis (ranging from 1 to 5). A red horizontal line at approximately 75 dBµV/m represents the Average Limit Level. A blue line represents the Corrected Average Reading, which remains below the limit. Several sharp blue peaks represent the Corrected Peak Reading, with the highest peak reaching approximately 60 dBµV/m. A legend in the top right corner identifies the lines: Average Limit Level (red), Corrected Average Reading (blue), Peak Limit Level (red), and Corrected Peak Reading (blue). The Professional Testing, EMI, Inc. logo is also present.</p> </div> </div> <div> <div> Operator: Eric Lifsey  16162-RERun03-TxMode/MHzGHz.tif  02:33:38 PM, Sunday, September 21, 2014 </div> <div> EUT Mode: Transmit, Unmodulated, 418 MHz  EUT Power: 12 VDC  HPF </div> <div> EUT: Model 4L-3600-4  Project Number: 16162-15  Client: 4L-Design Tow Mate </div> </div>			
<b>&gt; 1GHz Horizontal Antenna Polarity Measured Emissions</b>			

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.  
 (Note that average duty cycle factor is -20 dB and the peaks shown above result in passing averages.)

## 8.0 Antenna Construction Requirements

### 8.1 Procedure

A direct examination of the antenna construction is performed and compared to rule criteria that prevents wireless device antennas from being modified by end users in ways that would void their authorization to use the device.

### 8.2 Criteria

Section Number FCC   IC	Clause Subject	Date
15.203   RSS-Gen	Antenna Construction	2014-11-30

### 8.3 Results

Antenna Manufacturer, Details
<p>Manufactured by: TowMate</p> <p>Antenna is a fixed length of insulated wire soldered directly to the circuit board.</p> <p>No external connector.</p>

The antenna is not subject to user replacement or substitution.

The antenna design satisfies the requirements of the rules.



## 9.0 Equipment Lists

### 9.1 Equipment for Fundamental Power and Spurious Radiated Emissions

Professional Testing, EMI, Inc.					
Test Method:	ANSI C63.4-2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference,				
In accordance with:	FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, Radiated Emissions Limits				
Section:	15.209				
Test Date(s):	9/21/2014 - 11/16/2014	EUT Serial #:	None		
Customer:	4L-Design Towmate	EUT Part #:	None		
Project Number:	16162-15	Test Technician:	Eric Lifsey		
Purchase Order #:	Not Listed	Supervisor:	Lisa Arndt		
Equip. Under Test:	4L-3600-4	Witness' Name:	None		
Radiated Emissions Test Equipment List					
Tile! Software Version:		4.2.A, May 23, 2010, 08:38:52 AM			
Test Profile:		Radiated Emissions_Profile Version October 12, 2011			
Asset #	Manufacturer	Model	Equipment Nomenclature	Serial Number	Calibration Due Date
1509A	Braden	N/A	TDK 10M Chamber, NSA < 1 GHz	DAC-012915-005	11/29/2014
1890	HP	8447F	Preamp/Amp, 9kHz-1300MHz, 28/25dB	3313A05298	1/22/2015
1937	Agilent	E4440A	Spectrum Analyzer, 3 Hz - 26.5 GHz	MY44303298	12/2/2015
1926	ETS-Lindgren	3142D	Antenna, Biconilog, 26 MHz - 6 GHz	00135454	12/29/2014
C027	N/A	RG214	Cable Coax, N-N, 25m	none	10/22/2015
1327	EMCO	1050	Controller, Antenna Mast	none	N/A
0942	EMCO	11968D	Turntable, 4ft.	9510-1835	N/A
1969	HP	11713A	Attenuator/Switch Driver	3748A04113	N/A
1509B	Braden	N/A	TDK 10M Chamber, VSWR > 1 GHz	DAC-012915-005	11/16/2014
2004	Miteq	AFS44-00101800-2S-10P-44	Amplifier, 40dB, .1-18GHz	0	11/19/2014
C030	N/A	0	Cable Coax, N-N, 30m	none	10/10/2015
1780	ETS-Lindgren	3117	Antenna, Double Ridged Guide Horn, 1 - 18 GHz	00110313	1/21/2015
1325	EMCO	1050	Controller, Antenna Mast	9003-1461	N/A

## 9.2 Equipment for Timings and Bandwidth

Asset #	Manufacturer	Model #	Description	Calibration Due
1486	EMCO	3147	Log Periodic Antenna	Not Required
1342	Rohde & Schwarz	FSP-30	Spectrum Analyzer	2015-01-29

## **Appendix: Policy, Rationale, and Evaluation of EMC Measurement Uncertainty**

All uncertainty calculations, estimates and expressions thereof shall be in accordance with NIST policy. Since PTI operates in accordance with NIST (NVLAP) Handbook 150-11: 2007, all instrumentation having an effect on the accuracy or validity of tests shall be periodically calibrated or verified traceable to national standards by a competent calibration laboratory. The certificates of calibration or verification on this instrumentation shall include estimates of uncertainty as required by NIST Handbook 150-11.

### **1. Rationale and Summary of Expanded Uncertainty.**

Each piece of instrumentation at PTI that is used in making measurements for determining conformance to a standard (or limit), shall be assessed to evaluate its contribution to the overall uncertainty of the measurement in which it is used. The assessment of each item will be based on either a type A evaluation or a type B evaluation. Most of the evaluations will be type B, since they will be based on the manufacturer's statements or specifications of the calibration tolerances, or uncertainty will be stated along with a brief rationale for the type of evaluation and the resulting stated uncertainties.

The individual uncertainties included in the combined standard uncertainty for a specific test result will depend on the configuration in which the item of instrumentation is used. The combination will always be based on the law of propagation of uncertainty. Any systematic effects will be accommodated by including their uncertainties, in the calculation of the combined standard uncertainty; except that if the direction and amount of the systematic effect cannot be determined and separated from its uncertainty, the whole effect will be treated as uncertainty and combined along with the other elements of the test setup.

Type A evaluations of standard uncertainty will usually be based on calculating the standard deviation of the mean of a series of independent observations, but may be based on a least-squares curve fit or the analysis of variance for unusual situations. Type B evaluations of standard uncertainty will usually be based on manufacturer's specifications, data provided in calibration reports, and experience. The type of probability distribution used (normal, rectangular, a priori, or u-shaped) will be stated for each Type B evaluation.

In the evaluation of the uncertainty of each type of measurement, the uncertainty caused by the operator will be estimated. One notable operator contribution to measurement uncertainty is the manipulation of cables to maximize the measured values of radiated emissions. The operator contribution to measurement uncertainty is evaluated by having several operators independently repeat the same test. This results in a Type A evaluation of operator-contributed measurement uncertainty.

A summary of the expanded uncertainties of PTI measurements is shown as Table 1. These are the worst-case uncertainties considering all operative influence factors.

**Table 1: Summary of Measurement Uncertainties for Site 45**

Type of Measurement	Frequency Range	Meas. Dist.	Expanded Uncertainty U, dB (k=2)
Mains Conducted Emissions	150 kHz to 30 MHz	N/A	2.9
Telecom Conducted Emissions	150 kHz to 30 MHz	N/A	2.8
Radiated Emissions	30 to 1,000 MHz	10 m	4.8
	1 to 18 GHz	3 m	5.7

## **End of Report**

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