LS Research, LLC

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ENGINEERING TEST REPORT # 307151 TX TCB R3 LSR Job# C-167

Compliance Testing of:

RF MAC - Module/Portable

Model #: 054901

Test Date(s):

November 29 & 30, December 2, 3, &7, 2007

Prepared For: Etratech Inc.

Attn: Mr. Steve Sanders 1047 Cooke Boulevard

Burlington, Ontario, Canada L7T 4A8

In accordance with:

Federal Communications Commission (FCC)
Part 15, Subpart C, Section 15.247
Digital Modulation Transmitters (DTS) Operating in the
Frequency Band 2400 MHz – 2483.5 MHz

This Test Report	t is issued	d under the <i>I</i>	Authority of:
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Brian E. Petted, VP of Engineering

Signature: Date: May 7, 2008

esa a White

Test Report Prepared by:

Teresa A. White, Document Coordinator

Tested by:

Laura Bott, EMC Engineer

Signature:

Date: May 7, 2008

Signature:

Date: May 7, 2008

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LSC Revision Control

Date	Revision #	Revised By
9-06-06	2.0	AS/TAW

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EXHIBIT 1. INTRODUCTION

1.1 <u>SCOPE</u>

References:	FCC Part 15, Subpart C, Section 15.247	
Title:	Telecommunication – Code of Federal Regulations,	
	CFR 47, Part 15	
Purpose of Test:	To gain FCC Certification Authorization for Digital	
	Modulation Transmitters operating in the Frequency Band	
	of 2400 MHz – 2483.5 MHz	
Test Procedures:	Both conducted and radiated emissions measurements	
	were conducted in accordance with American National	
	Standards Institute ANSI C63.4 – American National	
	Standard for Methods of Measurement of Radio-Noise	
	Emissions from Low-Voltage Electrical and Electronic	
	Equipment in the Range of 9 kHz to 40 GHz.	
Environmental Classification:	Commercial, Industrial or Business	
	Residential	

1.2 NORMATIVE REFERENCES

Publication	Year	Title
47 CFR, Parts 0-15 (FCC)	2005	Code of Federal Regulations -
, ,		Telecommunications
		American National Standard for Methods of
ANSI C63.4	2003	Measurement of Radio-Noise Emissions from
7 11 13 13 13 13	2000	Low-Voltage Electrical and Electronic Equipment
		in the Range of 9 kHz to 40 GHz.
		Specification for radio disturbance and immunity
CISPR 16-1-1	2003	measuring apparatus and methods.
		Part 1-1: Measuring Apparatus.
		Specification for radio disturbance and immunity
CISPR 16-2-1	2003	measuring apparatus and methods.
		Part 201: Conducted disturbance measurement.
FCC Public Notice	2000	Part 15 Unlicensed Modular Transmitter Approval
DA 00-1407	2000	Tart 19 Officerised Wooddar Transmitter Approval
FCC ET Docket No.	2002	Amendment to FCC Part 15 of the Commission's
99-231	2002	Rules Regarding Spread Spectrum Devices.
FCC Propodures	2005 02 22	Measurement of Digital Transmission Systems
FCC Procedures	2005, 03-23	operating under Section 15.247.

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1.3 LS Research, LLC TEST FACILITY

LS Research, LLC is accredited by A2LA (American Association for Laboratory Accreditation) to conform to ISO/IEC 17025, 2005 "General Requirements for the Competence of Calibration and Testing Laboratories".

LS Research, LLC's scope of accreditation includes all test methods listed herein, unless otherwise noted. A copy of the accreditation may be accessed on our web site: www.lsr.com. Accreditation status can be verified at A2LA's web site: www.a2la2.net.

1.4 LOCATION OF TESTING

All testing was performed at LS Research, LLC, W66 N220 Commerce Court, Cedarburg, Wisconsin, 53012 USA, utilizing the facilities listed below, unless otherwise noted.

List of Facilities Located at LS Research, LLC:

- Compact Chamber
- Semi-Anechoic Chamber
- Open Area Test Site (OATS)

1.5 <u>TEST EQUIPMENT UTILIZED</u>

A complete list of equipment utilized in testing is provided in Appendix A of this test report. Calibration dates are indicated in Appendix A. All test equipment is calibrated in accordance with A2LA standards.

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EXHIBIT 2. PERFORMANCE ASSESSMENT

2.1 **CLIENT INFORMATION**

Manufacturer Name:	Etratech Inc
Address:	1047 Cooke Boulevard
	Burlington, Ontario, Canada L7T 4A8
Contact Person:	Mr. Steve Sanders

2.2

EQUIPMENT UNDER TEST (EUT) INFORMATION
The following information has been supplied by the applicant.

Product Name: RF MAC – Module/Portable	
Model Number:	054901
Serial Number:	N/A

2.3 **ASSOCIATED ANTENNA DESCRIPTION**

PCB trace inverted F antenna with a calculated gain of 3dBi.

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2.4 <u>EUT'S TECHNICAL SPECIFICATIONS</u>

Additional Information:

Frequency Range (in MHz)	2405 – 2480 MHz
RF Power in Watts	.1 watts
Conducted Output Power (in dBm)	20 dBm
Field Strength (and at what distance)	127.8 dBµV/m at 1 meter
Occupied Bandwidth (99% BW)	2708 kHz
Type of Modulation	O-QPSK
Emission Designator	G1D2M70
EIRP (in mW)	177.01 mW
Transmitter Spurious (worst case)	84.79 dBµV at 1 meter
Frequency Tolerance %, Hz, ppm	100 ppm
Microprocessor Model # (if applicable)	N/A
Antenna Information	
Detachable/non-detachable	Non-detachable
Туре	Inverted F
Gain (in dBi)	3
EUT will be operated under FCC Rule	15.247
Part(s)	
Modular Filing	☐ Yes ⊠ No

RF Technical Information:

Type of		SAR Evaluation: Device Used in the Vicinity of the Human Head
Evaluation		SAR Evaluation: Body-worn Device
(check one)	$\sqrt{}$	RF Evaluation

If RF Evaluation checked above, test engineer to complete the following:

"	oncored above, tool originoor to complete the following.
•	Evaluated against exposure limits:
•	Duty Cycle used in evaluation: 1.60 %
•	Standard used for evaluation: OET 65
•	Measurement Distance: 3 m
•	RF Value: 2.45 \boxtimes V/m (at 1m) \square A/m \square W/m ²
	Measured Computed Calculated

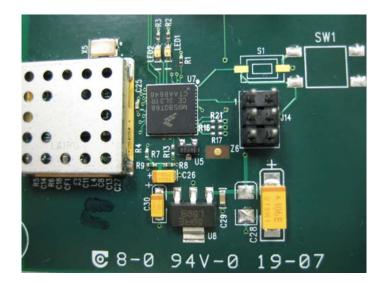
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2.5 **PRODUCT DESCRIPTION**

This transmitter will be placed in a Mini Bar Main Fridge Control, manufactured by Etratech, used on the Domestic Hi-Promatic 3000, 4000, and 6000 series.

PHOTO





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EXHIBIT 3. EUT OPERATING CONDITIONS & CONFIGURATIONS DURING TESTS

3.1 CLIMATE TEST CONDITIONS

Temperature:	20-25°C
Humidity:	30-60%
Pressure:	86-106 kPa

3.2 APPLICABILITY & SUMMARY OF EMC EMISSION TEST RESULTS

FCC Paragraph Test Requirements		Compliance (yes/no)
15.207	Power Line Conducted Emissions Measurements	Yes
15.247(a)(2)	6 dB Bandwidth of a Digital Modulation System	Yes
15.247(b) & 1.1310	Maximum Output Power	Yes
15.247(i), 1.1307, 1.1310, 2.1091 & 2.1093	RF Exposure Limit	Yes
15.247(c)	RF Conducted Spurious Emissions at the Transmitter Antenna Terminal	Yes
15.247(d)	Transmitted Power Spectral Density of a Digital Modulation System	Yes
15.247(c), 15.209 & 15.205	Transmitter Radiated Emissions	Yes

The digital circuit portion of the EUT has been tested and verified to comply with FCC Part 15, Subpart B, Class B Digital Devices and the associated Radio Receiver has also been tested and found to comply with Part 15, Subpart B – Radio Receivers. The Receiver Test Report is available upon request.

3.3	MODIFICATIONS IN	CORPORATED IN THE EUT FOR COMPLIANCE PURPOSES
	None	⊠ Yes (explain below)
Power	r was reduced on cha	annels 14, 15, and 16.

3.4 <u>DEVIATIONS & EXCLUSIONS FROM TEST SPECIFICATIONS</u> ☑ None ☐ Yes (explain below)

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EXHIBIT 4. DECLARATION OF CONFORMITY

The EUT was found to meet the requirements as described within the specification of FCC Title 47, CFR Part 15.247, and Industry Canada RSS-210, Issue 7 (2007), Section Annex 8 (section 8.2) for a Digital Spread Spectrum (DTS) Transmitter.

If some emissions are seen to be within 3 dB of their respective limits:

As these levels are within the tolerances of the test equipment and site employed, there is a possibility that this unit, or a similar unit selected out of production may not meet the required limit specification if tested by another agency.

LS Research, LLC certifies that the data contained herein was taken under conditions that meet or exceed the requirements of the test specifications. The results in this Test Report apply only to the item(s) tested on the above-specified dates. Any modifications made to the EUT subsequent to the indicated test date(s) will invalidate the data herein, and void this certification.

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EXHIBIT 5. RADIATED EMISSIONS TEST

5.1 Test Setup

The test setup was assembled in accordance with Title 47, CFR FCC Part 15 and ANSI C63.4-2004. The EUT was placed on an 80cm high non-conductive pedestal, centered on a flush mounted 2-meter diameter turntable inside a 3 meter Semi-Anechoic, FCC listed Chamber. The EUT was operated in receive mode and modulated transmit mode on 6 channels: low, medium, and high full power channels, and three high channels at reduced power.

A bench power supply was used to provide 12 VDC to the EUT.

The applicable limits apply at a 3 meter distance. Measurements from 5 GHz to 18 GHz were performed at a 1.0 meter separation distance and measurements from 18 GHz to 25 GHz were performed at a 30 cm separation distance. The calculations to determine these limits are detailed in the following pages. Please refer to Appendix A for a complete list of test equipment. The test sample was operated on one of six (6) standard channels: low (2405 MHz), middle (2440 MHz) and high (2465 MHz) to comply with FCC Part 15.35. The channels and operating modes were changed by soldering zero ohm jumpers in pertinent circuit traces.

5.2 Test Procedure

Radiated RF measurements were performed on the EUT in a 3 meter Semi-Anechoic, FCC listed Chamber. The frequency range from 30 MHz to 25000 MHz was investigated. The radiated RF emission levels were recorded at various fixed degree turntable azimuths and antenna heights. The EUT was placed on a non-conductive pedestal in the 3 meter Semi-Anechoic Chamber, with the antenna mast 3 meters from the EUT. A Biconical Antenna was used to measure emissions from 30 MHz to 300 MHz, and a Log Periodic Antenna was used to measure emissions from 300 MHz to 1000 MHz. A Double-Ridged Waveguide Horn Antenna was used from 1 GHz to 18 GHz. The maximum radiated RF emissions were found by raising and lowering the antenna between 1 and 4 meters in height, using both horizontal and vertical antenna polarities. From 18 GHz to 25 GHz, the EUT was measured at a 0.3 meter separation, using a standard gain Horn Antenna and pre-amplifier.

The EUT was rotated along three orthogonal axes during the investigations to find the highest emission levels.

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5.3 Test Equipment Utilized

A list of the test equipment and antennas utilized for the Radiated Emissions test can be found in Appendix A. This list includes calibration information and equipment descriptions. All equipment is calibrated and used according to the operation manuals supplied by the manufacturers. All calibrations of the antennas used were performed at an N.I.S.T. traceable site. In addition, the Connecting Cables were measured for losses using a calibrated Signal Generator and a HP 8546A EMI Receiver. The resulting correction factors and the cable loss factors from these calibrations were entered into the HP 8546A EMI Receiver database. As a result, the data taken from the HP 8546A EMI Receiver accounts for the antenna correction factor as well as cable loss or other corrections, and can therefore be entered into the database as a corrected meter reading. The HP 8546A EMI Receiver was operated with a resolution bandwidth of 120 kHz for measurements below 1 GHz (video bandwidth of 300 kHz), and a bandwidth of 1 MHz for measurements above 1 GHz (video bandwidth of 1 MHz From 5 GHz to 18 GHz, an HP E4407B Spectrum Analyzer and an EMCO Horn Antenna were used. From 18 GHz to 25 GHz, the HP E4407B Spectrum Analyzer with a standard gain horn, and preamp were used.

Test Results

The EUT was found to meet the Radiated Emissions requirements of Title 47 CFR, FCC Part 15.247 for a DTS transmitter [Canada RSS-210 Issue 7 (2007), Annex 8 (section 8.2). The frequencies with significant RF signal strength were recorded and plotted as shown in the Data Charts and Graphs.

5.4 Test Equipment List

Test Equipment	Manufacturer	Model No.	Serial No.
EMI Receiver	HP	8546A	3617A00320
EMI Receiver Pre-Select.	HP	85460A	3448A00296
Spectrum Analyzer	Agilent	E4446A	US45300564
Log Periodic Antenna	EMCO	93146	9701-4855
Horn Antenna	EMCO	3115	6907
Bicon Antenna	EMCO	93110B	9702-2918
Pre-Amp	Adv. Microwave	WLA612	1145A04094
Horn Antenna – Std. Gain	EMCO	3160-09	9809-1120

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5.5 CALCULATION OF RADIATED EMISSIONS LIMITS

The maximum peak output power of an intentional radiator in the 2400-2483.5 MHz band, as specified in Title 47 CFR 15.247 (b)(3), is 1 Watt. The harmonic and spurious RF emissions, as measured in any 100 kHz bandwidth, as specified in 15.247 (d), shall be at least 20 dB below the measured power of the desired signal, and must also meet the requirements described in 15.205(c).

The following table depicts the general radiated emission limits above 30 MHz. These limits are obtained from Title 47 CFR, Part 15.209, for radiated emissions measurements. These limits were applied to any signals found in the 15.205 restricted bands.

Frequency (MHz)	3 m Limit μV/m	3 m Limit (dBμV/m)	1 m Limit (dBµV/m)
30-88	100	40.0	-
88-216	150	43.5	-
216-960	200	46.0	-
960-24,000	500	54.0	63.5

Sample conversion from field strength μ V/m to dB μ V/m: dB μ V/m = 20 log ₁₀ (100) = 40 dB μ V/m (from 30-88 MHz)

For measurements made at 1.0 meter, a 9.5 dB correction has been invoked.

960 MHz to 10,000 MHz $500\mu V/m$ or 54.0 dB/ $\mu V/m$ at 3 meters 54.0 + 9.5 = 63.5 dB/ $\mu V/m$ at 1 meter

For measurements made at 0.3 meter, a 20 dB correction has been invoked.

960 MHz to 10,000 MHz $500\mu\text{V/m}$ or $54.0 \text{ dB/}\mu\text{V/m}$ at 3 meters $54.0 + 20 = 74 \text{ dB/}\mu\text{V/m}$ at 0.3 meters

A 20 dB relaxation factor was available for use to demonstrate compliance. The relaxation factor was only used to demonstrate upper band edge compliance.

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3 Meter Measurements of Electromagnetic Radiated Emissions Test Standard: 47CFR, Part 15.205 and 15.247(DTS) Frequency Range Inspected: 30 MHz to 25000 MHz

r requeries range inspected. So will be 20000 will be								
Manufacturer:	Etrate	Etratech						
Date(s) of Test:	Dece	mber 2 & 3, 2007						
Test Engineer(s):	Laura	Bott						
Voltage:	12 VI	OC						
Operation Mode:	Modu	lated Transmit and Rec	eive					
Environmental	Temp	erature: 20 – 25° C						
Conditions in the Lab:	Relat	ive Humidity: 30 – 60 %	0					
EUT Power:		Single PhaseVAC Battery			3 PhaseVAC		AC	
EUT Power.				1	Other: Bench DC Power Supply		OC Power Supply	
EUT Placement:	1	80cm non-conductive	table		10cm Spacers			
EUT Test Location:	V	3 Meter Semi-Anechoic			3/10m OATS			
201 Tool Zoodilon.	'	FCC Listed Chamber	isted Chamber					
Measurements:		Pre-Compliance		Prelir	minary		Final	
Detectors Used:		Peak	$\sqrt{}$	√ Quasi-Peak √ Average		Average		

The following table depicts the level of significant spurious radiated RF emissions found:

Frequency (MHz)	Height (m)	Azimuth (degree)	Peak Reading (dBμV/m)	Q-Peak Reading (dBμV/m)	Q-Peak Limit (dBμV/m)	Margin (dB)	Antenna Polarity	EUT orientation
298	1	0	38.8	32.8	46.02	13.22	Vertical	Vertical
245	1	0	37.0	31.1	46.02	14.92	Vertical	Vertical
44.6	1	0	26.3	21.1	40	18.9	Horizontal	Vertical
996	1	0	43.9	38.5	54	15.5	Horizontal	Vertical
828.7	1	0	39.9	34.7	46.02	11.32	Vertical	Side
43.4	1	0	43.4	36.8	40	3.2	Horizontal	Side
790	1	0	39.2	33.8	46.02	12.22	Vertical	Flat
794.5	1	0	32.6	26.7	46.02	19.32	Horizontal	Flat

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Average Reading (dBμV/m)	15.247 Limit (dBμV/m)	Margin (dB)
2405	V/V	1.16	264	127.46	134.7	7.24
2440	V/V	1	259	127.56	134.7	7.14
2465	V/V	1	257	127.8	134.7	6.9
2470	H/V	1.04	317	123.95	134.7	21.05
2475	V/V	1	53.1	118.97	134.7	26.03
2480	V/S	1	319	108.45	134.7	37

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RADIATED EMISSIONS DATA CHART (continued) The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 1:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBµV/m)	15.247 Limit (dBμV/m)	Margin (dB)
4810	V/V	1	80	60.88	63.5	2.62
7215	V/F	1	235	74.48	97.96	23.48
9620	H/S	1	343	73.67	97.96	24.29
12025	H/S	1	133	54.87	63.5	8.63
14430	V/S	1.08	197	61.44	97.96	36.52
16835	V/F	1	0	68.85	97.96	29.11
19240				(Note 3)	74	
21645				(Note 3)	107.96	
2406				(Note 3)	107.96	

The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 8:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBµV/m)	15.247 Limit (dBμV/m)	Margin (dB)
4880	H/S	1	315	56.43	63.5	7.07
7320	H/V	1	255	52.3	63.5	11.2
9760	V/V	1	0	73.81	98.06	24.25
12200	V/V	1	0	51.73	63.5	11.77
14640	V/V	1	0	63	98.06	35.06
17080				(Note 3)	98.06	
19520				(Note 3)	74	
21960				(Note 3)	108.06	
24400				(Note 3)	108.06	

The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 13:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBµV/m)	15.247 Limit (dΒμV/m)	Margin (dB)
4930	V/V	1	358	57.56	63.5	5.94
7395	V/V	1	109	60.17	63.5	3.33
9860	V/V	1	0	84.79	98.3	13.51
12325	V/S	1	0	55.49	63.5	8.01
14790				(Note 3)	98.3	
17255				(Note 3)	98.3	
19720				(Note 3)	74	
22185				(Note 3)	74	
24650				(Note 3)	108.3	

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The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 14:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBμV/m)	15.247 Limit (dBμV/m)	Margin (dB)
4940				*Note 3	63.5	
7410	V/V	1.03	24	44.9	63.5	18.6
9880				*Note 3	103.95	
12350				*Note 3	63.5	
14820				*Note 3	103.95	
17290				*Note 3	103.95	
19760				*Note 3	74.0	
22230				*Note 3	74.0	
24700				*Note 3	113.95	

The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 15:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBμV/m)	15.247 Limit (dBμV/m)	Margin (dB)
4950	V/V	1.08	341	43.44	63.5	10.56
7425				*Note 3	63.5	
9900				*Note 3	98.97	
12375				*Note 3	63.5	
14850				*Note 3	98.97	
17325				*Note 3	98.97	
19800				*Note 3	74.0	
22275				*Note 3	74.0	
24750				*Note 3	108.97	

The following table depicts the level of significant radiated RF fundamental and harmonic emissions seen on Channel 16:

Frequency (MHz)	Ant/EUT Polarity	Height (meters)	Azimuth (0°-360°)	Peak Reading (dBμV/m)	15.247 Limit (dBμV/m)	Margin (dB)
4960				*Note 3	63.5	
7440				*Note 3	63.5	
9920				*Note 3	88.45	
12400				*Note 3	88.45	
14880				*Note 3	88.45	
17360				*Note 3	88.45	
19840				*Note 3	74.0	
22320				*Note 3	74.0	
24800				*Note 3	98.45	

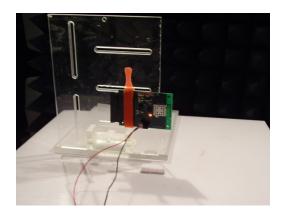
Notes:

- 1) A Quasi-Peak Detector was used in measurements below 1 GHz, and Peak measurements were noted between 1 GHz. And 18 GHz, no averaging above 1 GHz was necessary, as the peak readings were sufficiently below the limit. Measurements above 1 GHz were made at 1 meters of separation from the EUT, and at 0.3 m separation for frequencies between 18 25 GHz.
- 2) For measurements of the fundamental power, because of spectral bandwidth, the receiver was set to RBW=VBW=3 MHz, all other measurements taken above 1 GHz were with RBW = 1 MHz and VBW = 1 MHz.
- 3) Measurement at receiver system noise floor.

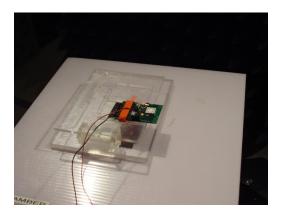
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 16 of 41

5.7 <u>Test Setup Photo(s) – Radiated Emissions Test</u>

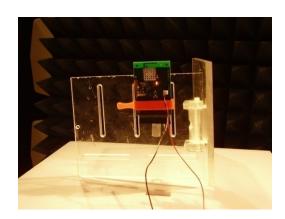
Vertical Orientation



Flat Orientation



Side Orientation



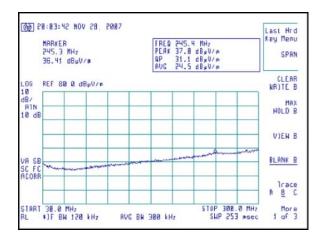
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 17 of 41

5.8 Screen Captures - Radiated Emissions Testing

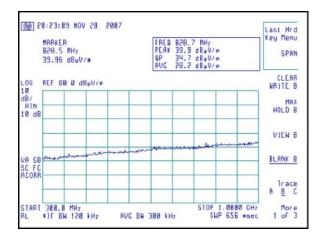
These screen captures represent Peak Emissions. For radiated emission measurements, a Quasi-Peak detector function is utilized when measuring frequencies below 1 GHz, and an Average detector function is utilized when measuring frequencies above 1 GHz.

The signature scans shown here are from worst-case emissions, as measured on channel 1, with the sense antenna both in vertical and horizontal polarity for worst case presentations.

Channel 01, Antenna Vertically Polarized, EUT Vertical Position 30-300 MHz, at 3m



Channel 01, Antenna Vertically Polarized, EUT Vertical Position 300-1000 MHz, at 3m



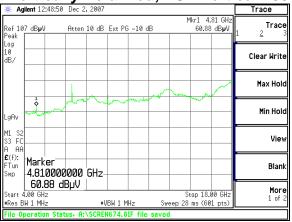
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 18 of 41

Screen Captures - Radiated Emissions Testing (continued)

Channel 1, Antenna Vertically Polarized, EUT Vertical 1000-4000 MHz, at 1m



Channel 1, Antenna Vertically Polarized, EUT Vertical 4000-18000 MHz, at 1m



Channel 1, Antenna Vertically Polarized, 18000-25000 MHz, at 30cm



Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 19 of 41

6.1 Test Setup

The test area and setup are in accordance with ANSI C63.4-2004 and with Title 47 CFR, FCC Part 15 (Industry Canada RSS-210, Issue 7 (2007)). The EUT was placed on a non-conductive wooden table, with a height of 80 cm above the reference ground plane. The EUT's power was derived from a bench-type DC power supply, which was plugged into a 50Ω (ohm), $50/250~\mu\text{H}$ Line Impedance Stabilization Network (LISN). The AC power supply of 120V was provided inside the shielded room via an appropriate broadband EMI Filter, and then to the LISN line input. Final readings were then taken and recorded. After the EUT was setup and connected to the LISN, the RF Sampling Port of the LISN was connected to a 10 dB Attenuator-Limiter, and then to the HP 8546A EMI Receiver. The EMCO LISN used has the ability to terminate the unused port with a 50Ω (ohm) load when switched to either L1 (line) or L2 (neutral).

6.2 Test Procedure

The EUT was investigated in continuous transmit mode for this portion of the testing. The appropriate frequency range and bandwidths were selected on the EMI Receiver, and measurements were made. The bandwidth used for these measurements is 9 kHz, as specified in CISPR 16-1 (2003), Section 1, Table 1, for Quasi-Peak and Average detectors in the frequency range of 150 kHz to 30MHz. Final readings were then taken and recorded.

Test Equipment Utilized

A list of the test equipment and accessories utilized for the Conducted Emissions test is provided in Appendix A. This list includes calibration information and equipment descriptions. All equipment is calibrated and used according to the operation manuals supplied by the manufacturers. Calibrations of the LISN and Limiter are traceable to N.I.S.T. All cables are calibrated and checked periodically for conformance. The emissions are measured on the HP 8546A EMI Receiver, which has automatic correction for all factors stored in memory and allows direct readings to be taken.

6.3 Test Equipment List

Test Equipment	Manufacturer	Model No.	Serial No.
EMI Receiver	HP	8546A	3617A00320
Spectrum Analyzer	Agilent	E4446A	US45300564
LISN	EMCO	3816/2NM	9701-1057
Transient Limiter	HP	119474A	3107A01708

Test Results

The EUT was found to meet the Conducted Emission requirements of FCC Part 15.207 Conducted Emissions for an Intentional Radiator. See the Data Charts and Graphs for more details of the test results.

Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 20 of 41

FCC Limits of Conducted Emissions at the AC Mains Ports 6.4

Frequency Range	Class B Limits (dBµV)		Measuring	
(MHz)	Quasi-Peak	Average	Bandwidth	
0.150 -0.50 *	66-56	56-46	RBW = 9 kHz	
0.5 - 5.0	56	46	VBW ≥ 9 kHz for QP	
5.0 – 30	60	50	VBW = 1 Hz for Average	
* The limit decrea				
logarithm of the fre	equency in this ra	ange.		

Sample calculation for the limits in the 0.15 to 0.5 MHz: Limit = -19.12 (Log10 (F[MHz] / 0.15 [MHz])) + 66.0 dB μ V

Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 21 of 41

TEST DATA CHART CONDUCTED EMISSION

Frequency Range inspected: 150 KHz to 30 MHz
Test Standard: FCC 15.207 Class B

Manufacturer:	Etra	Etratech				
Date(s) of Test:	12/7	7/2007				
Test Engineer:	Lau	ra Bott				
Model #:	054	901				
Serial #:	N/A	1				
Voltage:	12V	'DC				
Operation Mode:	Cor	Continuous Transmit				
Environmental	Ten	Temperature: 20 – 25°C				
Conditions in the Lab:	Relative Humidity: 30 – 60 %					
Test Location:	$\sqrt{}$	√ Shielded Room				Chamber
EUT Placed On:		40cm from Vertical Ground Plane			10cm Spacers	
EUT Placed Off.	$\sqrt{}$	80cm above Ground Plane			Other:	
Measurements:		Pre-Compliance		Preliminary	1	Final
Detectors Used:		Peak	$\sqrt{}$	Quasi-Peak	√	Average

			<u>QUASI-PEAK</u>			<u>!</u>	<u>AVERAGE</u>	
	Frequency (kHz)	Line	Q-Peak Reading (dBµV)	Q-Peak Limit (dBμ V)	Quasi-Peak Margin (dB)	Average Reading (dBµV)	Average Limit (dBμ V)	Average Margin (dB)
ı	167.7	L1	50.90	65.11	14.21	19.50	55.07	35.57
ĺ	164.7	L2	51.50	65.22	13.72	19.80	55.22	35.42

Notes:

- 1) The emissions listed are characteristic of the power supply used, and did not change by the EUT.
- 2) All other emissions were better than 20 dB below the limits.
- 3) The EUT exhibited similar emissions in transmit and receive modes, and across the Low, Middle and High channels tested.

Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 22 of 41

6.6 <u>Test Setup Photo(s) – Conducted Emissions Test</u>



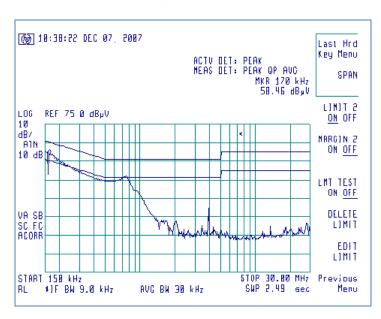
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 23 of 41

6.7 <u>Screen Captures – Conducted Emissions Test</u>

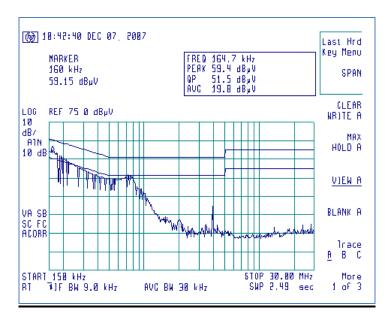
These screen captures represent Peak Emissions. For conducted emission measurements, both a Quasi-Peak detector function and an Average detector function are utilized. The emissions must meet both the Quasi-peak limit and the Average limit as described in 47 CFR 15.207.

The signature scans shown here are from channel 1.

Channel 1, 2405 MHz, Line 1



Channel 1, 2405 MHz, Line 2



Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 24 of 41

EXHIBIT 7. OCCUPIED BANDWIDTH: 15.247(a)(2)

7.1 Limits

For a Digital Modulation System, the 6 dB bandwidth shall be at least 500 kHz.

7.2 Method of Measurements

Refer to ANSI C63.4 (2004) and FCC Procedures (March 23, 2005) for Digital Transmission Systems operating under 15.247.

The transmitter output was connected to the Spectrum Analyzer. The bandwidth of the fundamental frequency was measured with the Spectrum Analyzer using 300 kHz RBW and VBW=300 kHz.

The bandwidth requirement found in FCC Part 15.247(a)(2) requires a minimum -6dBc occupied bandwidth of 500 kHz. For this portion of the tests, a direct measurement of the transmitted signal was performed at the antenna port of the EUT, via a cable connection to the HP E4407B spectrum analyzer. The correction factors for the cable loss were loaded on the analyzer. A Hewlett Packard model E4407B spectrum analyzer was used with the resolution bandwidth set to 300 kHz for this portion of the tests. The EUT was configured to run in a continuous transmit mode. The spectrum analyzer was used in peak-hold mode while measurements were made, as presented in the chart below.

From this data, the closest measurement when compared to the specified limit is 1383 kHz, which is above the minimum of 500 kHz.

Test Data

					
Channel	Center Frequency (MHz)	Measured -6 dBc Occupied Bandwidth (kHz)	Minimum -6 dBc Limit(kHz)	Measured -20 dBc Occupied Bandwidth (kHz)	
1	2405	1592	500	2667	
8	2440	1650	500	2675	
13	2465	1608	500	2675	
14	2470	1592	500	2700	
15	2475	1667	500	2708	
16	2480	1617	500	2683	

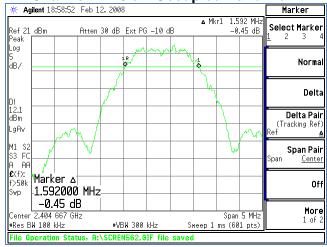
7.3 Test Equipment List

Test Equipment	Manufacturer	Model No.	Serial No.
Spectrum Analyzer	Agilent	E4446A	US45300564

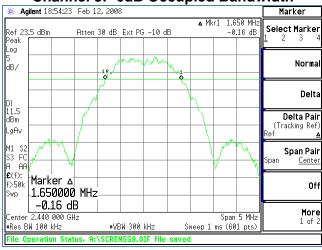
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 25 of 41

7.4 Screen Captures - OCCUPIED BANDWIDTH

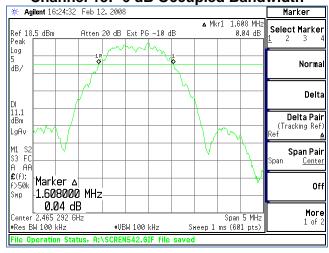
Channel 1: -6 dB Occupied Bandwidth



Channel 8: -6dB Occupied Bandwidth

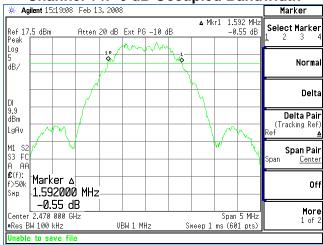


Channel 13: -6 dB Occupied Bandwidth

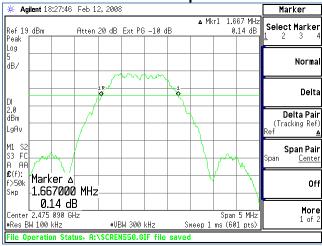


Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 26 of 41

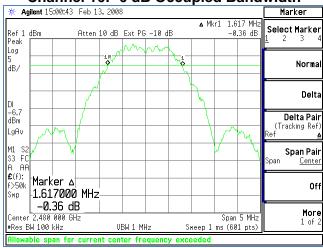
Channel 14: -6 dB Occupied Bandwidth



Channel 15: -6dB Occupied Bandwidth

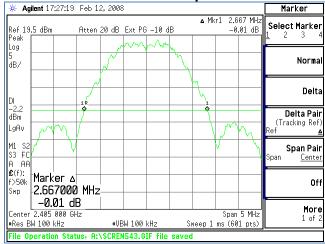


Channel 16: -6 dB Occupied Bandwidth

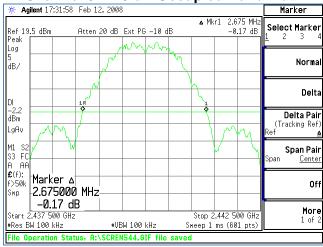


Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 27 of 41

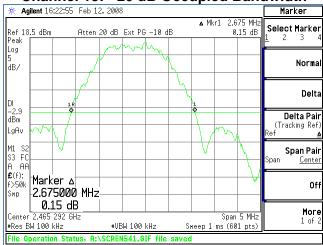
Channel 1: -20 dB Occupied Bandwidth



Channel 8: -20 dB Occupied Bandwidth

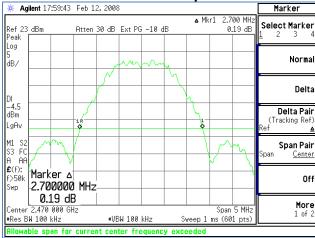


Channel 13: -20 dB Occupied Bandwidth

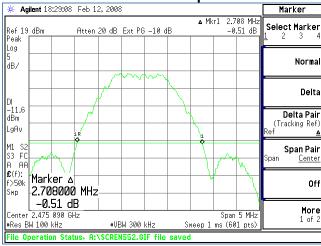


Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 28 of 41

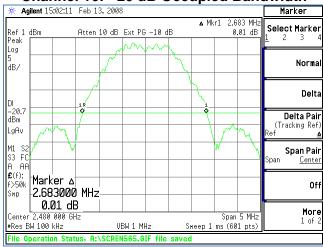
Channel 14: -20 dB Occupied Bandwidth



Channel 15: -20 dB Occupied Bandwidth



Channel 16: -20 dB Occupied Bandwidth



Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 29 of 41

EXHIBIT 8. BAND-EDGE MEASUREMENTS

8.1 Method of Measurements

FCC 15.209(b) and 15.247(d) require a measurement of spurious emission levels to be at least 20 dB lower than the fundamental emission level, in particular at the Band-Edges where the intentional radiator operates. The following screen captures demonstrate compliance of the intentional radiator at the 2400-2483.5 MHz Band-Edges. The EUT was operated in continuous transmit mode with continuous modulation, with internally generated data as the modulating source. The EUT was operated at the lowest channel for the investigation of the lower Band-Edge, and at the highest channel for the investigation of the higher Band-Edge.

The Lower Band-Edge limit, in this case, would be -20 dBc with respect to the fundamental level. The Upper Band-Edge limit, in this case, would be + 54 dB μ V/m at 3m.

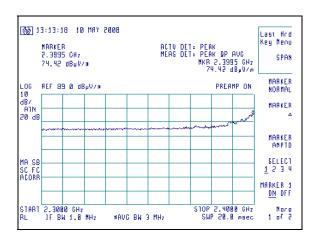
*Note, the 20 dB relaxation factor applied to the lower and upper band edge measurement is invoked to demonstrate compliance.

Data:

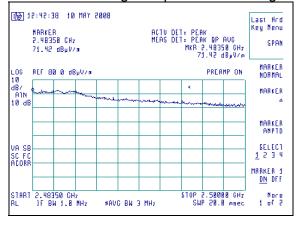
Frequency (MHz)	Peak Reading (dBμV/m)	Average Reading (dBμV/m)	Average Reading with 20 dB relaxation (dBµV/m)	Limit dBμV/m)	Margin (dB)
2390	72.36	62.63	42.63	54.00	1.64
2400	74.42	68.12	48.12	107.46	53.04
2483.5	71.42	58.98	38.98	54.00	2.58

Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
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Screen Capture Demonstrating Compliance at the Lower Band-Edge



Screen Capture Demonstrating Compliance at the Higher Band-Edge



Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 31 of 41

EXHIBIT 9. POWER OUTPUT (CONDUCTED): 15.247(b)

9.1 Method of Measurements

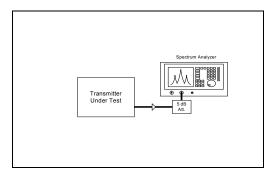
The conducted RF output power of the EUT was measured at the antenna port using a short RF cable along with an attenuator as protection for the spectrum analyzer. The loss from the cable and the attenuator were added on the analyzer as gain offset settings, thereby allowing direct measurements without the need for any further corrections. The unit was configured to run in a continuous transmit mode. The spectrum analyzer was used with resolution and video bandwidths set to 1 MHz, with measurements from a peak detector presented in the chart below.

9.2 Test Data

Channel	Center Frequency (MHz)	Measured Power (dBm)	Limit (dBm)	Margin (dB)	Calculated EIRP (dBm)	EIRP Limit (dBm)	Calculated EIRP (mw)
0	2405	19.72	30	10.28	22.72	36.0	187.07
8	2440	18.65	30	11.35	21.65	36.0	146.22
13	2465	18.83	30	11.17	21.83	36.0	152.41
16	2480	1.48	30	28.52	4.48	36.0	2.81

¹⁾ EIRP Calculation:

EIRP = (Peak power at antenna terminal in dBm) + (EUT Antenna gain in dBi) EIRP (mW) = 10^(EIRP in dBm/10)

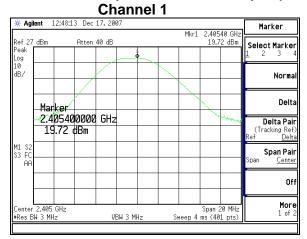


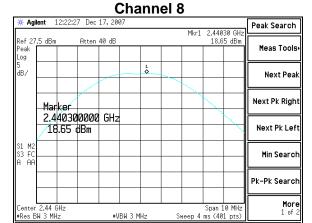
9.3 Test Equipment List

Test Equipment	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer	Agilent	E4446A	US45300564	3 Hz-44 GHz

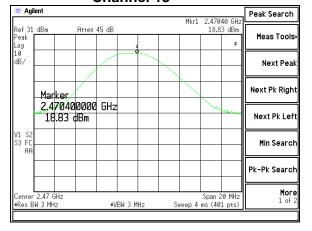
Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 32 of 41

9.4 Screen Captures – Power Output (Conducted)

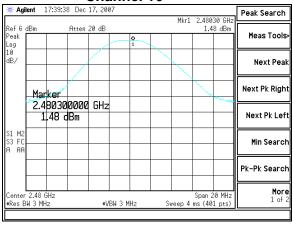




Channel 13



Channel 16



Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
Report #:307151 TX TCB R1	Customer FCC ID #:VFC054901	Page 33 of 41

EXHIBIT 10. POWER SPECTRAL DENSITY: 15.247(e)

10.1 Limits

For digitally modulate systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

In accordance with FCC Part 15.247(e), the peak power spectral density should not exceed +8 dBm in any 3 kHz band. This measurement was performed along with the conducted power output readings performed as described in previous sections. The peak output frequency for each representative frequency was scanned, with a narrow bandwidth, and reduced sweep, and a power density measurement was performed.

10.2 Test Equipment List

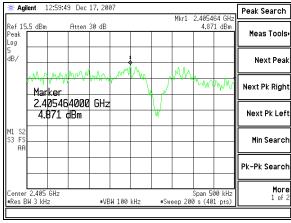
Test Equipment	Manufacturer	Model No.	Serial No.
Spectrum Analyzer	Agilent	E4446A	US45300564

0.3 Test Data

Transmitter Channel	Center Frequency (MHz)	Measured Channel Power (dBm/ 3 kHz)	Limit (dBm/3kHz)	Margin (dB)	Comments Pass/Fail
1	2405	4.871	8.0	3.1	Pass
8	2440	4.208	8.0	3.8	Pass
13	2465	4.022	8.0	4.0	Pass
16	2480	-12.65	8.0	20.7	Pass

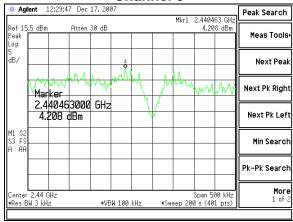
10.4 Screen Captures – Power Spectral Density

Channel 1

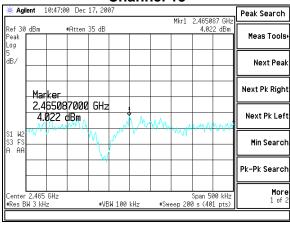


Prepared For: Etratech	Model #: 054901	LS Research, LLC
EUT: RF MAC – Module/Portable	Serial #:N/A	Template: 15.247 DTS TX (V2 9-06-06)
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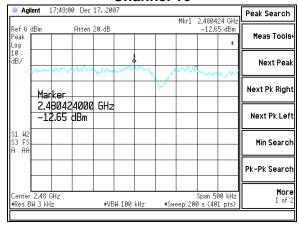
Channel 8



Channel 13



Channel 16



Prepared For: Etratech	Model #: 054901	LS Research, LLC
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EXHIBIT 11. SPURIOUS EMISSIONS: 15.247(d)

11.1 Limits

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 lease 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.

Please refer to section 5.6 for the radiated spurious emissions data.

FCC Part 15.247(d) requires a measurement of conducted harmonic and spurious RF emission levels, as reference to the carrier level when measured in a 100 kHz bandwidth. For this test, the spurious and harmonic RF emissions from the EUT were measured at the EUT antenna port using a short RF cable along with an attenuator as protection for the spectrum analyzer. The loss from the cable and the attenuator were added on the analyzer as gain offset settings, thereby allowing direct readings of the measurements made without the need for any further corrections. A Hewlett Packard model E4407B spectrum analyzer was used with the resolution bandwidth set to 100 kHz for this portion of the tests. The unit was configured to run in a continuous transmit mode. The spectrum analyzer was used with measurements from a peak detector presented in the chart below. Screen captures were acquired and any noticeable spurious and harmonic signals were identified and measured.

No significant emissions could be noted within -50 dBc of the fundamental level for this product.

	Channel 1	Channel 8	Channel 13	Channel 16
	Power	in dBm		
Fundamental	15.32	15.79	15.2	-3.0
2 nd Harmonic	-48.38	-57.35	-47.0	-75.8
3 rd Harmonic	-51.73	-48.02	-60.7	-79.9
4 th Harmonic	-74.26	Note (1)	Note (1)	Note (1)
5 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)
6 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)
7 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)
8 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)
9 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)
10 th Harmonic	Note (1)	Note (1)	Note (1)	Note (1)

Notes:

(1) Measurement at system noise floor.

11.2 Test Equipment List

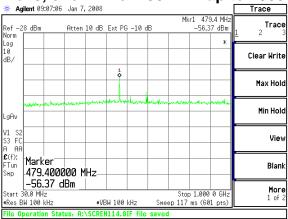
Test Equipment	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer	Agilent	E4446A	US45300564	3 Hz - 44 GHz

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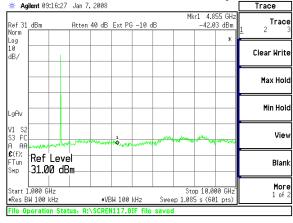
11.3 Screen Captures - Spurious Radiated Emissions

Representative plots of Conducted Emissions measurements on Channel 8, the middle channel, are presented here.

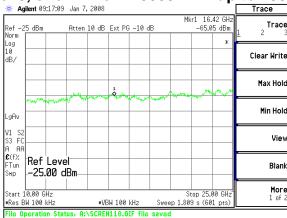
Channel 8, shown from 30 MHz up to 1000 MHz



Channel 8, shown from 1000 MHz up to 10000 MHz ** Agilent 09:16:27 Jan 7, 2008 Trace



Channel 8, shown from 10000 MHz up to 25000 MHz



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EXHIBIT 12. FREQUENCY & POWER STABILITY OVER VOLTAGE VARIATIONS

For measurements of the frequency and voltage stability, the transmitter was connected to a spectrum analyzer via the antenna port. The Spectrum Analyzer was used to measure the frequency at the appropriate frequency markers. For this test, the transmitter portion of the EUT was placed in continuous transmit CW mode. Power to the EUT was supplied by an external bench-type variable power supply. The frequency of operation was monitored using the spectrum analyzer. The frequency was measured with a receiver resolution bandwidth of 10 Hz, and video bandwidth of 10 Hz.

		DC/AC Voltage Source	9
	10.2 VDC	12 VDC	13.8 VDC
Channel 0	2405.291700 (MHz)	2405.2887000 (MHz)	2405.287000 (MHz)
Channel 8	2440.072600 (MHz)	2440.0073300 (MHz)	2440.080400 (MHz)
Channel F	2480.069800 (MHz)	2480.0498000 (MHz)	2480.0070000 (MHz)

		DC/AC Voltage Source		
		10.2 VDC 12.0 VDC 13.8 VDC		
,	Channel 0	1.52 (dBm)	2.58 (dBm)	1.60 (dBm)
•	Channel 8	-14.43 (dBm)	-15.09 (dBm)	-13.24 (dBm)
	Channel F	-27.43 (dBm)	-27-69 (dBm)	-28.41 (dBm)

No anomalies were noted, in the measured transmit power, varying less than 1.5 dB, during the voltage variation tests.

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EXHIBIT 13. MPE CALCULATIONS

The following MPE calculations are based on a 1.8 centimeter inverted-F printed circuit board trace antenna, with a measured ERP of 117.95 dB μ V/m, at 3 meters, and conducted RF power of +19.72 dBm as presented to the antenna. The calculated gain of this antenna, based on the ERP measurements is 3.0 dBi.

Prediction of MPE limit at a given distance

Equation from page 18 of OET Bulletin 65, Edition 97-01

$$S = \frac{PG}{4\pi R^2}$$

where: S = power density

P = power input to the 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

Maximum peak output power at antenna input terminal:

Maximum peak output power at antenna input terminal:

Antenna gain(typical):

Maximum antenna gain:

Prediction distance:

Prediction frequency:

MPE limit for uncontrolled exposure at prediction frequency:

19.72 (dBm)

93.756 (mW)

1.995 (numeric)

20 (cm)

Prediction frequency:

1 (mW/cm^2)

Power density at prediction frequency: 0.037216 (mW/cm^2)

Maximum allowable antenna gain: 17.3 (dBi)

Margin of Compliance at 20 cm = 14.3 dB

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APPENDIX A

Test Equipment List

Asset #	Manufacturer	Model #	Serial #	Description	Date	Due
AA960008	EMCO	3816/2NM	9701-1057	Line Impedance Stabilization Network	12/6/07	12/6/08
AA960031	HP	119474A	3107A01708	Transient Limiter	Note 1	Note 1
AA960077	EMCO	93110B	9702-2918	Biconical Antenna	9/19/07	9/19/08
AA960078	EMCO	93146	9701-4855	Log-Periodic Antenna	9/19/07	9/19/08
AA960081	EMCO	3115	6907	Double Ridge Horn Antenna	12/04/07	12/04/08
CC00221C	Agilent	E4407B	US39160256	Spectrum Analyzer	1/11/07	1/11/08
EE960004	EMCO	2090	9607-1164	Device Controller	N/A	N/A
EE960013	НР	8546A	3617A00320	Receiver RF Section	9/20/07	9/20/08
EE960014	НР	85460A	3448A00296	Receiver Pre-Selector	9/20/07	9/20/08
EE960073	Agilent	E4446A	US45300564	Spectrum Analyzer	8/17/07	8/17/08
N/A	LSC	Cable	0011	3 Meter ½" Armored Cable	Note 1	Note 1
N/A	LSC	Cable	0050	10 Meter RG 214 Cable	Note 1	Note 1
N/A	Pasternack	Attenuator	N/A	10 dB Attenuator	Note 1	Note 1

Note 1 - Equipment calibrated within a traceable system.

Uncertainty Statement

This uncertainty represents an expanded uncertainty expressed at approximately the 95 % confidence level, using a coverage factor of k=2.

Table of Expanded Uncertainty Values, (K=2) for Specified Measurements

Measurement Type	Particular Configuration	Uncertainty Values
Radiated Emissions	3 – Meter chamber, Biconical Antenna	4.24 dB
Radiated Emissions	3-Meter Chamber, Log Periodic Antenna	4.8 dB
Radiated Emissions	10-Meter OATS, Biconical Antenna	4.18 dB
Radiated Emissions	10-Meter OATS, Log Periodic Antenna	3.92 dB
Conducted Emissions	Shielded Room/EMCO LISN	1.60 dB
Radiated Immunity	3 Volts/Meter in 3-Meter Chamber	1.128 Volts/Meter
Conducted Immunity	3 Volts level	1.0 V

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Appendix B

Justifications of Average Duty Factor Calculations

Average (Relaxation) Factor

The following information was present in documentation provided by the customer:

Average Factor = 20^* Log_{10} (Worst Case EUT On-time over 100 ms time window)

The transmit packet occupies 1.6 ms of time, within any 100 ms window. Therefore, the relaxation factor allowance is calculated as:

Average Factor = $20* \text{Log}_{10} (1.6 / 100 \text{ ms}) = -35.9176$

Therefore, a relaxation factor of 20 dB would be allowable for this product.

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