

Design Pool Ltd

# TEST REPORT

**SCOPE OF WORK**

FCC TESTING–RHK51

**REPORT NUMBER**

250613054SZN-001

**ISSUE DATE**

22 July 2025

**[REVISED DATE]**

[-----]

**PAGES**

24

**DOCUMENT CONTROL NUMBER**

FCC ID 249\_C

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**Design Pool Ltd**

Application  
For  
Certification

**FCC ID: X3QRHK51**

**FIND IT CARD**

**Model: RHK51**

**Brand Name: Native Union**

**2.4GHz Transceiver**

**Report No.: 250613054SZN-001**

We hereby certify that the sample of the above item is considered to comply with the requirements of FCC Part 15, Subpart C for Intentional Radiator, mention 47 CFR [10-1-24]

Prepared and Checked by:

Approved by:

*Karot Huang*  
*Assistant Engineer*

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*Johnny Wang*  
*Project Engineer*  
*Date: 22 July 2025*

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## MEASUREMENT/TECHNICAL REPORT

This report concerns (check one:)                      Original Grant X                      Class II Change \_\_\_\_\_

Equipment Type: DXX - Part 15 Low Power Communication Device Transmitter

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Deferred grant requested per 47 CFR 0.457(d)(1)(ii)?                      Yes \_\_\_\_\_                      No X

If yes, defer until: \_\_\_\_\_  
date

Company Name agrees to notify the Commission by: \_\_\_\_\_  
date

of the intended date of announcement of the product so that the grant can be issued on that date.

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Transition Rules Request per 15.37?                      Yes \_\_\_\_\_                      No X

If no, assumed Part 15, Subpart C for intentional radiator – the new 47 CFR [10-1-24 Edition] provision.

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## 1.0 Summary of Test Result

Applicant: Design Pool Ltd

Applicant Address: 33/F, 88 Hing Fat Street, Causeway Bay, Hong Kong

Manufacturer: Design Pool Ltd

Manufacturer Address: 33/F, 88 Hing Fat Street, Causeway Bay, Hong Kong

MODEL: RHK51

FCC ID: X3QRHK51

Test Specification	Reference	Results
Transmitter Radiated Emission Band edge	15.249 &15.209 &15.205	Pass
20dB Bandwidth	15.215(c)	Pass

Notes: The EUT uses an Integral Antenna which in accordance to Section 15.203 is considered sufficient to comply with the provisions of this section.

## 2.0 General Description

### 2.1 Product Description

The equipment under test (EUT) is a FIND IT CARD with Bluetooth 5.3 BLE function operating in 2402-2480MHz. The EUT is powered by DC 3V by battery. For more detail information pls. refer to the user manual.

Antenna Type: Integral antenna

Modulation Type: GFSK

Antenna Gain: 1.28dBi Max (This information is provided by applicant, and the applicant is responsible for the authenticity of the provided information.)

Bluetooth Version: 5.3 BLE (Single Mode)

For electronic filing, the brief circuit description is saved with filename: descri.pdf.

### 2.2 Related Submittal(s) Grants

This is an application for certification of a transceiver for the FIND IT CARD which has Bluetooth function.

### 2.3 Test Methodology

Radiated emission measurements were performed according to the procedures in ANSI C63.10 (2013). Radiated emission measurement was performed in Semi-anechoic chamber. For radiated emission measurement, preliminary scans were performed in the semi-anechoic chamber only to determine the worst-case modes. All radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "Justification Section" of this Application. All other measurements were made in accordance with the procedures in part 2 of CFR 47.

### 2.4 Test Facility

The Semi-Anechoic chamber used to collect the radiated data is **Intertek Testing Services Shenzhen Ltd. Longhua Branch** and located at 101, 201, Building B, No. 308 Wuhe Avenue, Zhangkengjing Community, GuanHu Subdistrict, LongHua District, ShenZhen, P.R. China. This test facility and site measurement data have been fully placed on file with the FCC (Registration Number: CN1188).

## 3.0 System Test Configuration

### 3.1 Justification

The system was configured for testing in a typical fashion (as a customer would normally use it), and in the confines as outlined in ANSI C63.10 (2013).

The EUT is powered by DC 3V from battery during the test, only the worst data was reported in this report.

For maximizing emissions below 30 MHz, the EUT was rotated through 360°, the bottom of the loop antenna was placed 1 meter above the ground, and the antenna polarization was changed. For maximizing emissions, the EUT was rotated through 360°, the antenna height was varied from 1 meter to 4 meters above the ground plane, and the antenna polarization was changed. This step by step procedure for maximizing emissions led to the data reported in Section 4.

The EUT and transmitting antenna was centered on the turntable.

The equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). The EUT was placed on a turn table, which enabled the engineer to maximize emissions through its placement in the three orthogonal axes.

### 3.2 EUT Exercising Software

The EUT exercise program (provided by client) used during testing was designed to exercise the various system components in a manner similar to a typical use.

### 3.3 Special Accessories

No special accessories used.

### 3.4 Equipment Modification

Any modifications installed previous to testing by Design Pool Ltd will be incorporated in each production model sold / leased in the United States.

No modifications were installed by Intertek Testing Services Shenzhen Ltd. Longhua Branch.

## 3.5 Measurement Uncertainty

When determining the test conclusion, the Measurement Uncertainty of test has been considered.

## 3.6 Support Equipment List and Description

Description	Manufacturer	Remark
USB cable (Provided by applicant)	Provided by applicant	unshielded, 1m
Laptop (Provided by Intertek)	DELL	Latitude 5480



## 4.0 Emission Results

Data is included worst-case configuration (the configuration which resulted in the highest emission levels).

### 4.1 Radiated Test Results

A sample calculation, configuration photographs and data tables of the emissions are included.

#### 4.1.1 Field Strength Calculation

The field strength is calculated by adding the reading on the Spectrum Analyzer to the factors associated with preamplifiers (if any), antennas, cables, pulse desensitization and average factors (when specified limit is in average and measurements are made with peak detectors). A sample calculation is included below.

$$FS = RA + AF + CF - AG + PD + AV$$

Where

- FS = Field Strength in dB $\mu$ V/m
- RA = Receiver Amplitude (including preamplifier) in dB $\mu$ V
- CF = Cable Attenuation Factor in dB
- AF = Antenna Factor in dB/m
- AG = Amplifier Gain in dB
- PD = Pulse Desensitization in dB
- AV = Average Factor in -dB

In the radiated emission table which follows, the reading shown on the data table may reflect the preamplifier gain. An example of the calculations, where the reading does not reflect the preamplifier gain, follows:

$$FS = RA + AF + CF - AG + PD + AV$$

Assume a receiver reading of 62.0 dB $\mu$ V is obtained. The antenna factor of 7.4 dB/m and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted. The pulse desensitization factor of the spectrum analyzer was 0 dB, and the resultant average factor was -10 dB. The net field strength for comparison to the appropriate emission limit is 32 dB $\mu$ V/m. This value in dB $\mu$ V/m was converted to its corresponding level in  $\mu$ V/m.

$$\begin{aligned} RA &= 62.0 \text{ dB}\mu\text{V} \\ AF &= 7.4 \text{ dB/m} \\ CF &= 1.6 \text{ dB} \\ AG &= 29.0 \text{ dB} \\ PD &= 0 \text{ dB} \\ AV &= -10 \text{ dB} \\ FS &= 62 + 7.4 + 1.6 - 29 + 0 = 42 \text{ dB}\mu\text{V/m} \end{aligned}$$

$$\text{Level in } \mu\text{V/m} = \text{Common Antilogarithm } [(42 \text{ dB}\mu\text{V/m})/20] = 125.9 \mu\text{V/m}$$

#### 4.1.2 Radiated Emission Configuration Photograph

For electronic filing, the worst case radiated emission configuration photograph is saved with filename: radiated photos. pdf.

#### 4.1.3 Radiated Emissions

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Worst Case Radiated Emission  
at  
935.268667 MHz

Judgement: Passed by 12.2 dB

#### **TEST PERSONNEL:**

*Sign on file*

Karot Huang, Assistant Engineer  
*Typed/Printed Name*

11 July 2025  
*Date*

Applicant: Design Pool Ltd

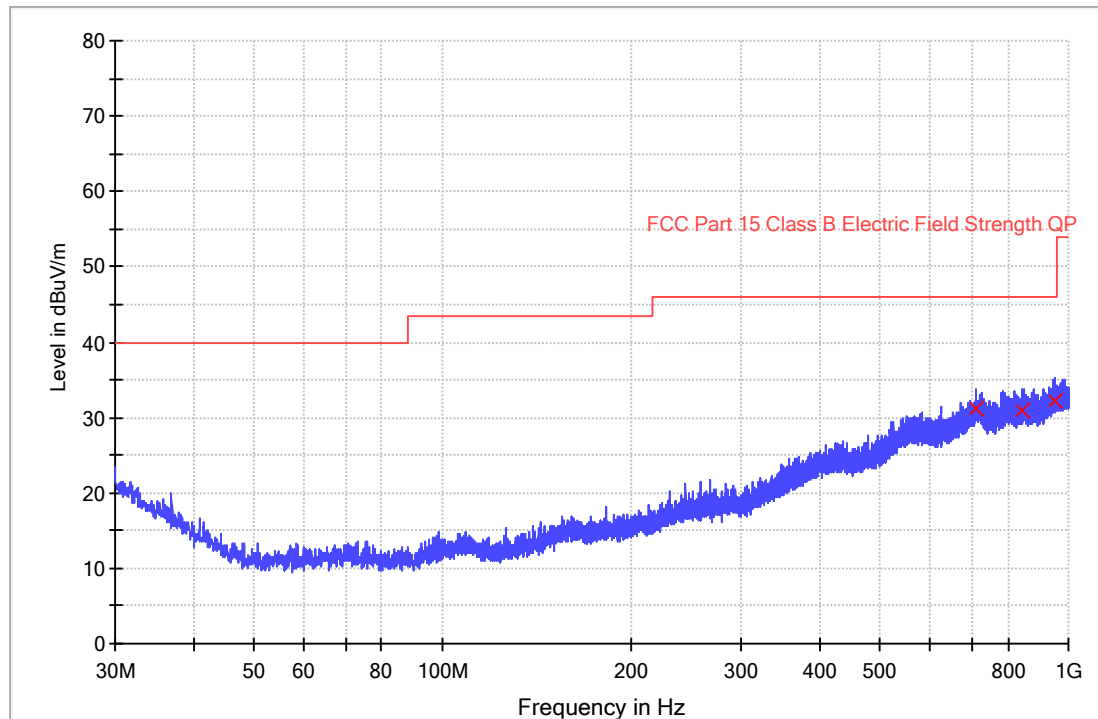
Date of Test: 11 July 2025

Worst Case Operating Mode:

Model: RHK51

BT Link

ANT Polarity: Horizontal



Frequency (MHz)	Quasi Peak (dBμV/m)	Meas. Time (ms)	Bandwidth (kHz)	Polarization	Corr. (dB/m)	Margin - QPK (dB)	Limit - QPK (dBμV/m)
713.397333	31.2	1000.0	120.000	H	31.1	14.8	46.0
843.054000	30.9	1000.0	120.000	H	31.8	15.1	46.0
952.146667	32.1	1000.0	120.000	H	33.7	13.9	46.0

Remark:

1. Corr. (dB/m) = Antenna Factor (dB/m) + Cable Loss (dB)
2. Quasi Peak (dBμV/m) = Corr. (dB/m) + Read Level (dBμV)
3. Margin (dB) = Limit Line (dBμV/m) – Level (dBμV/m)

Applicant: Design Pool Ltd

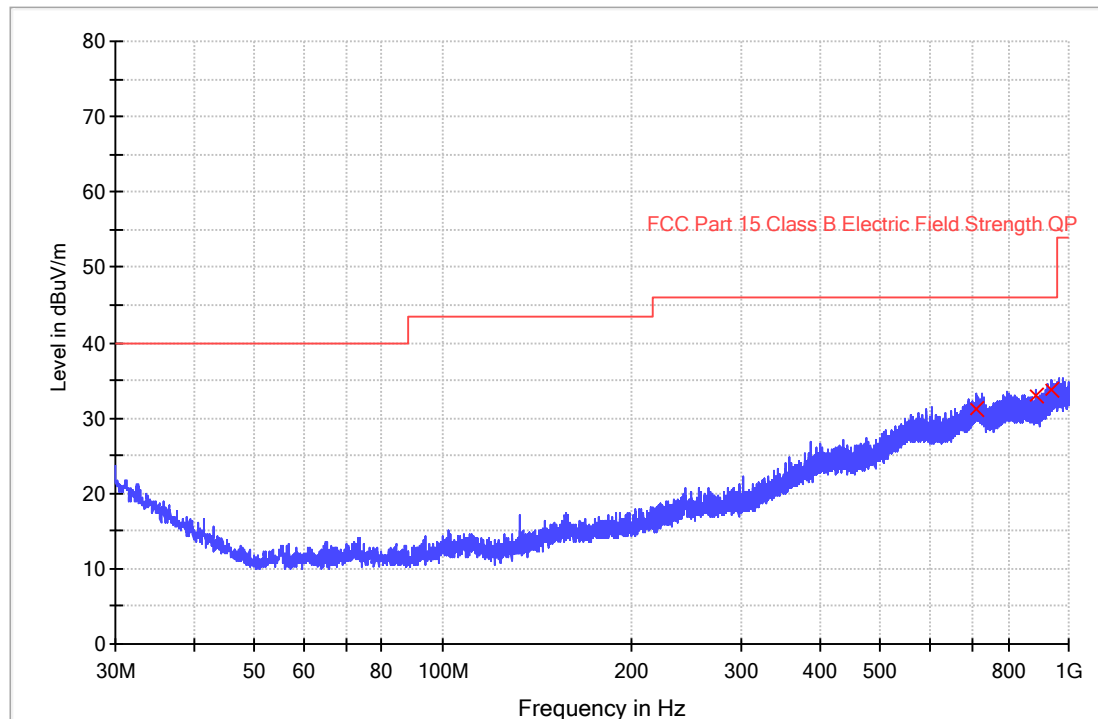
Date of Test: 11 July 2025

Worst Case Operating Mode:

Model: RHK51

BT Link

ANT Polarity: Vertical



Frequency (MHz)	Quasi Peak (dBμV/m)	Meas. Time (ms)	Bandwidth (kHz)	Polarization	Corr. (dB/m)	Margin - QPK (dB)	Limit - QPK (dBμV/m)
714.238000	31.1	1000.0	120.000	V	31.1	14.9	46.0
884.052667	32.9	1000.0	120.000	V	31.7	13.1	46.0
935.268667	33.8	1000.0	120.000	V	33.1	12.2	46.0

Remark:

1. Corr. (dB/m) = Antenna Factor (dB/m) + Cable Loss (dB)
2. Quasi Peak (dBμV/m) = Corr. (dB/m) + Read Level (dBμV)
3. Margin (dB) = Limit Line (dBμV/m) – Level (dBμV/m)

## 4.1.4 Transmitter Spurious Emissions (Radiated)

Worst Case Radiated Emission  
at  
9920.000 MHz

For electronic filing, the worst case radiated emission configuration photograph is saved with filename: radiated photos. pdf.

The data on the following page lists the significant emission frequencies, the limit and the margin of compliance. Numbers with a minus sign are below the limit.

Judgement: Passed by 6.2 dB

**TEST PERSONNEL:**

*Sign on file*

Karot Huang, Assistant Engineer

*Typed/Printed Name*

11 July 2025

*Date*

Applicant: Design Pool Ltd

Date of Test: 11 July 2025

Worst Case Operating Mode:

Model: RHK51

Transmitting

Table 1

## Radiated Emissions

(2402MHz)

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
Horizontal	2402.000	98.3	36.7	28.1	89.7	114.0	-24.3
Horizontal	4804.000	48.3	36.7	35.5	47.1	74.0	-26.9
Horizontal	7206.000	51.7	36.1	36.5	52.1	74.0	-21.9
Horizontal	9608.000	56.4	36.2	37.0	57.2	74.0	-16.8

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
Horizontal	2402.000	89.0	36.7	28.1	80.4	94.0	-13.6
Horizontal	4804.000	38.7	36.7	35.5	37.5	54.0	-16.5
Horizontal	7206.000	43.1	36.1	36.5	43.5	54.0	-10.5
Horizontal	9608.000	46.2	36.2	36.5	46.5	54.0	-10.5

Notes: 1. Peak detector is used for the emission measurement (RBW=1MHz / VBW=3MHz for Peak value, and RBW=1MHz / VBW=10Hz for Average value; RBW=3MHz is used for fundamental emission measurement).

2. All measurements were made at 3 meter. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.

3. Negative value in the margin column shows emission below limit.

4. Horn antenna is used for the emission over 1000MHz.

Applicant: Design Pool Ltd  
Date of Test: 11 July 2025  
Worst Case Operating Mode:

Model: RHK51  
Transmitting

Table 2

## Radiated Emissions

(2440MHz)

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
Vertical	2440.000	94.7	36.7	28.1	86.1	114.0	-27.9
Vertical	4880.000	48.9	36.7	35.5	47.7	74.0	-26.3
Vertical	7320.000	52.6	36.1	37.2	53.7	74.0	-20.3
Vertical	9760.000	56.9	36.2	37.0	57.7	74.0	-16.3

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
Vertical	2440.000	87.9	36.7	28.1	79.3	94.0	-14.7
Vertical	4880.000	39.1	36.7	35.5	37.9	54.0	-16.1
Vertical	7320.000	42.8	36.1	37.2	43.9	54.0	-10.1
Vertical	9760.000	45.1	36.2	37.0	45.9	54.0	-8.1

- Notes: 1. Peak detector is used for the emission measurement (RBW=1MHz / VBW=3MHz for Peak value, and RBW=1MHz / VBW=10Hz for Average value; RBW=3MHz is used for fundamental emission measurement).
2. All measurements were made at 3 meter. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna is used for the emission over 1000MHz.

Applicant: Design Pool Ltd

Date of Test: 11 July 2025

Worst Case Operating Mode:

Model: RHK51

Transmitting

Table 3

## Radiated Emissions

(2480MHz)

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Peak Limit at 3m (dBμV/m)	Margin (dB)
Vertical	2480.000	94.3	36.7	28.1	85.7	114.0	-28.3
Vertical	4960.000	51.8	36.7	35.5	50.6	74.0	-23.4
Vertical	7440.000	55.9	36.1	37.2	57.0	74.0	-17.0
Vertical	9920.000	56.4	36.3	38.9	59.0	74.0	-15.0

Polarization	Frequency (MHz)	Reading (dBμV)	Pre-Amp Gain (dB)	Antenna Factor (dB/m)	Net at 3m (dBμV/m)	Average Limit at 3m (dBμV/m)	Margin (dB)
Vertical	2480.000	85.9	36.7	28.1	77.3	94.0	-16.7
Vertical	4960.000	46.9	36.7	35.5	45.7	54.0	-8.3
Vertical	7440.000	45.7	36.1	37.2	46.8	54.0	-7.2
Vertical	9920.000	45.2	36.3	38.9	47.8	54.0	-6.2

Notes: 1. Peak detector is used for the emission measurement (RBW=1MHz / VBW=3MHz for Peak value, and RBW=1MHz / VBW=10Hz for Average value; RBW=3MHz is used for fundamental emission measurement).

2. All measurements were made at 3 meter. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.

3. Negative value in the margin column shows emission below limit.

4. Horn antenna is used for the emission over 1000MHz.



## 5.0 Equipment Photographs

For electronic filing, the photographs of the tested EUT are saved with filename: external photos.pdf & internal photos.pdf.

## 6.0 Product Labelling

For electronic filing, the FCC ID label artwork and the label location are saved with filename: label.pdf.

## 7.0 Technical Specifications

For electronic filing, the block diagram and schematics of the tested EUT are saved with filename: block.pdf and circuit.pdf respectively.

## 8.0 Instruction Manual

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf.

This manual will be provided to the end-user with each unit sold/leased in the United States.

## 9.0 Miscellaneous Information

This miscellaneous information includes details of the measured bandedge, 20dB Bandwidth, the test procedure and calculation of factor such as pulse desensitization.

### 9.1 Bandedge Plot

The test plots are attached as below. From the below plots, the field strength of any emissions outside of the specified frequency band are attenuated to the general radiated emission limits in section 15.209. It fulfils the requirement of 15.249(d).

#### Peak Measurement

Bandedge compliance is determined by applying marker-delta method, i.e (Bandedge Plot).

#### **(i) Lowest frequency channel (2402MHz):**

Peak Resultant field strength = Fundamental emissions (peak value) – delta from the bandedge plot

$$\begin{aligned} &= 89.7 \text{ dB}\mu\text{v/m} - 38.96 \text{ dB} \\ &= 50.74 \text{ dB}\mu\text{v/m} \end{aligned}$$

Average Resultant field strength = Fundamental emissions (average value) – delta from the bandedge plot

$$\begin{aligned} &= 80.4 \text{ dB}\mu\text{v/m} - 38.96 \text{ dB} \\ &= 41.44 \text{ dB}\mu\text{v/m} \end{aligned}$$

#### **(ii) Highest frequency channel (2480MHz):**

Peak Resultant field strength = Fundamental emissions (peak value) – delta from the bandedge plot

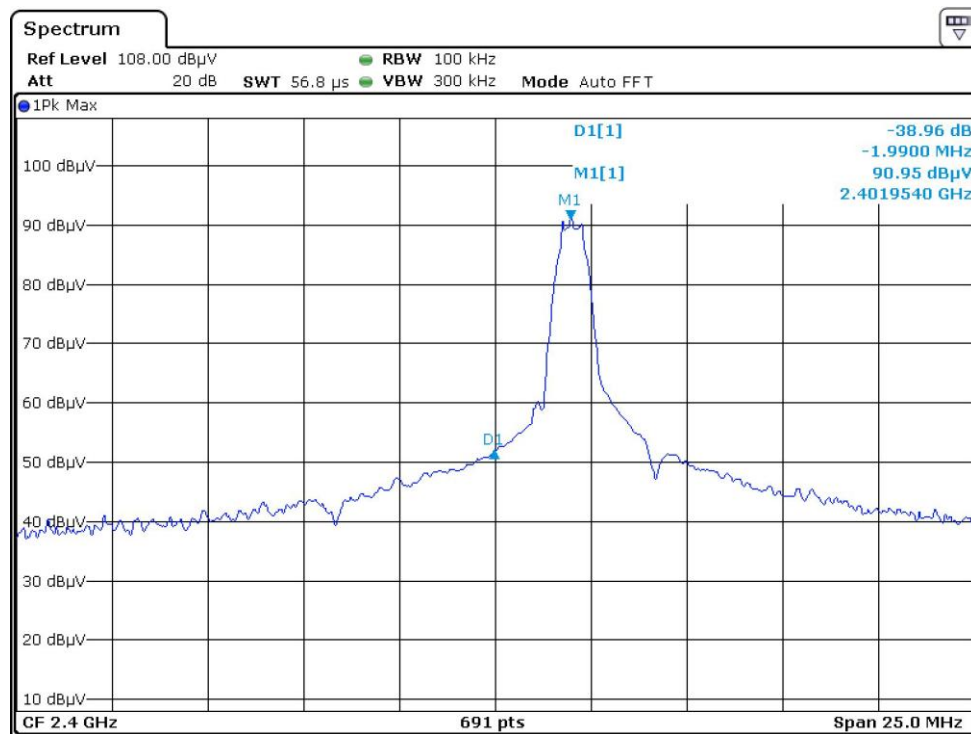
$$\begin{aligned} &= 85.7 \text{ dB}\mu\text{v/m} - 41.94 \text{ dB} \\ &= 43.76 \text{ dB}\mu\text{v/m} \end{aligned}$$

Average Resultant field strength = Fundamental emissions (average value) – delta from the bandedge plot

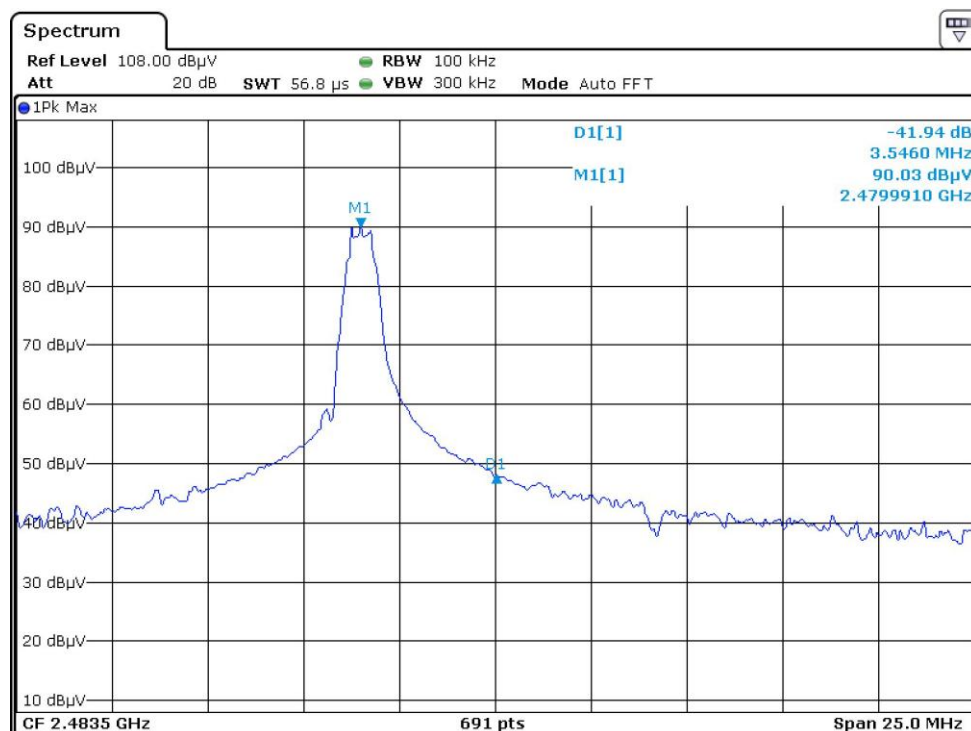
$$\begin{aligned} &= 77.3 \text{ dB}\mu\text{v/m} - 41.94 \text{ dB} \\ &= 35.36 \text{ dB}\mu\text{v/m} \end{aligned}$$

The resultant field strength meets the general radiated emission limit in section 15.209, which does not exceed 74dBμv/m (Peak Limit) and 54dBμv/m (Average Limit).

## Lowest frequency Channel

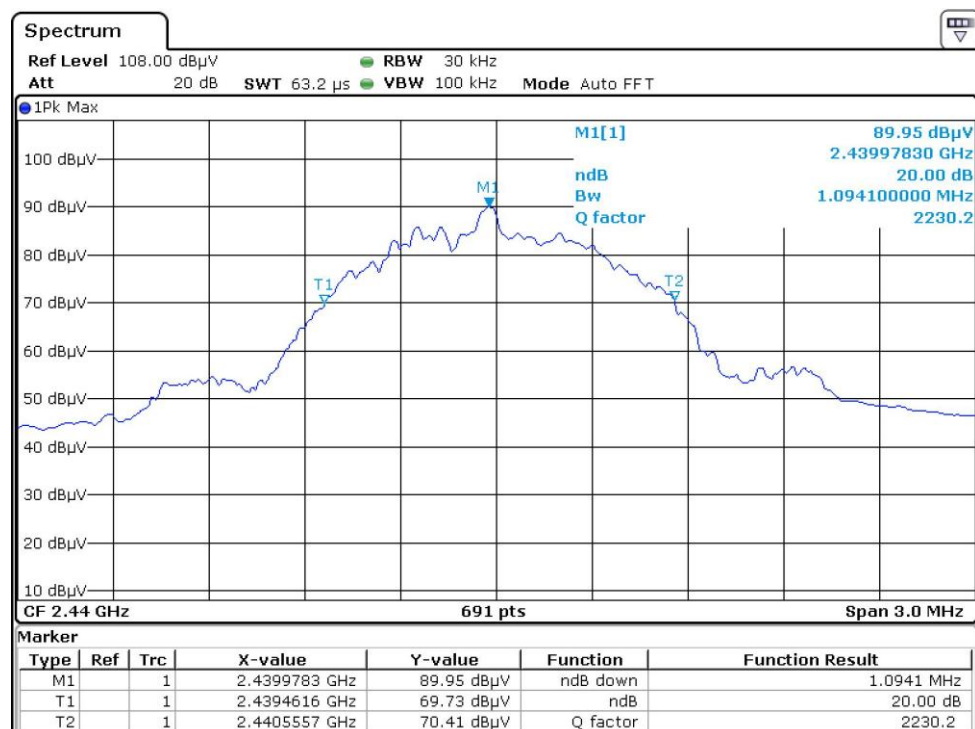
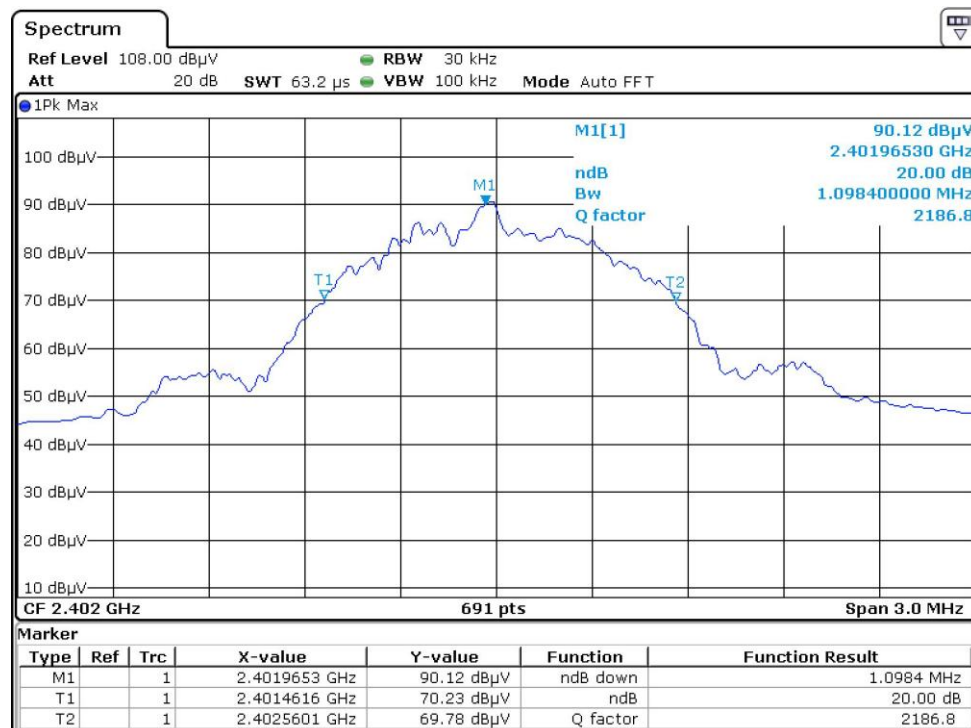


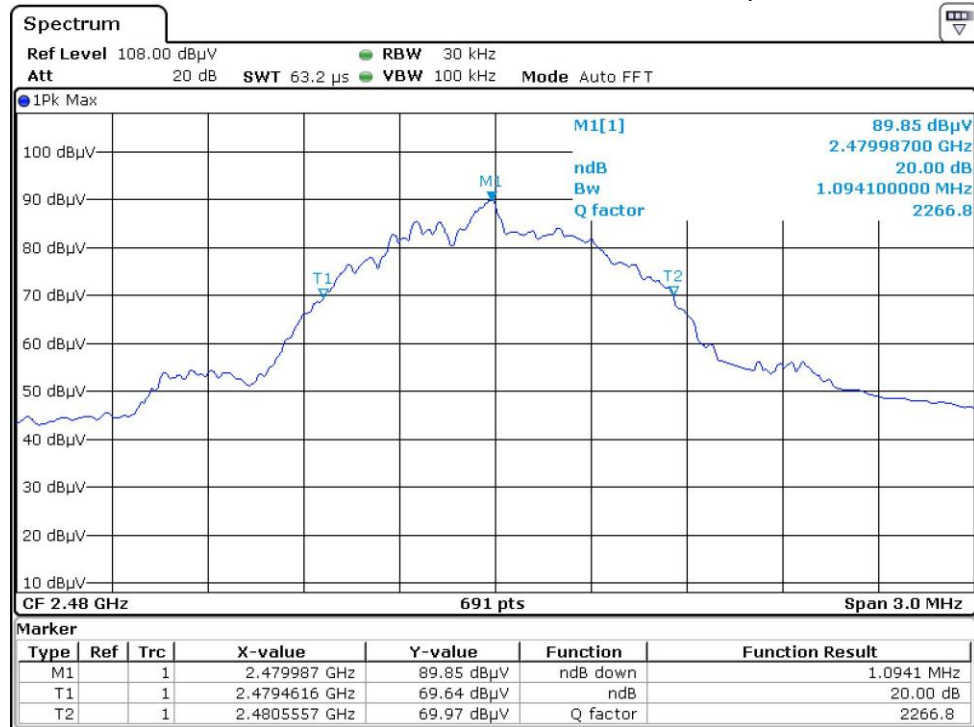
## Highest frequency Channel



## 9.2 20dB bandwidth

Pursuant to FCC part 15 Section 15.215(c), the 20dB bandwidth of the emission was contained within the frequency band designated (mentioned as above) which the EUT operated. The effects, if any, from frequency sweeping, frequency hopping, other modulation techniques and frequency stability over excepted variations in temperature and supply voltage were considered. The test plots are reported as below.





**9.3 Discussion of Pulse Desensitization**

Pulse desensitivity is not applicable for this device since the transmitter transmits the RF signal continuously.

**9.4 Transmitter Duty Cycle Calculation, FCC Rule 15.35(b, c)**

The EUT antenna output port was connected to the input of the spectrum analyzer. The analyzer center frequency was set to EUT RF channel carrier. The SWEP function on the analyzer was set to ZERO SPAN. The Transmitter ON time was determined from the resultant time-amplitude display:

	See attached spectrum analyzer chart (s) for Transmitter timing
	See Transmitter timing diagram provided by manufacturer
x	Not applicable, duty cycle was not used.

## 9.5 Emissions Test Procedures

The following is a description of the test procedure used by Intertek Testing Services in the measurements of transmitters operating under Part 15, Subpart C rules.

The test set-up and procedures described below are designed to meet the requirements of ANSI C63.10 - 2013.

The transmitting equipment under test (EUT) is placed on a styrene turntable which is four feet in diameter and approximately 0.8 meter up to 1GHz and 1.5 meter above 1GHz in height above the ground plane. During the radiated emissions test, the turntable is rotated and any cables leaving the EUT are manipulated to find the configuration resulting in maximum emissions. The EUT is adjust through all three orthogonal axes to obtain maximum emission levels. The antenna height and polarization are varied during the testing to search for maximum signal levels.

Detector function for radiated emissions is in peak mode. Average readings, when required, are taken by measuring the duty cycle of the equipment under test and subtracting the corresponding amount in dB from the measured peak readings. A detailed description for the calculation of the average factor can be found in section 9.4.

The frequency range scanned is from the lowest radio frequency signal generated in the device which is greater than 9 kHz to the tenth harmonic of the highest fundamental frequency or 40 GHz, whichever is lower.

## 9.5 Emissions Test Procedures (cont'd)

The EUT is warmed up for 15 minutes prior to the test.

AC power to the unit is varied from 85% to 115% nominal and variation in the fundamental emission field strength is recorded. If battery powered, a new, fully charged battery is used.

The IF bandwidth used for measurement of radiated signal strength was 10 kHz for emission below 30 MHz and 120 kHz for emission from 30 MHz to 1000 MHz. Where pulsed transmissions of short enough pulse duration warrant, a greater bandwidth is selected according to the recommendations of Hewlett Packard Application Note 150-2. Above 1000 MHz, a resolution bandwidth of 1 MHz is used (RBW 3MHz used for fundamental emission).

Transmitter measurements are normally conducted at a measurement distance of three meters. However, to assure low enough noise floor in the restricted bands and above 1 GHz, signals are acquired at a distance of one meter or less. All measurements are extrapolated to three meters using inverse scaling, but those measurements taken at a closer distance are so marked.



## 10.0 Test Equipment List

Equipment No.	Equipment	Manufacturer	Model No.	Serial No.	Cal. Date	Due Date
SZ182-02	RF Power Meter	Anritsu	ML2496A	1302005	2025-04-21	2026-04-21
SZ182-02-01	Power Sensor	Anritsu	MA2411B	1207429	2025-04-21	2026-04-21
SZ056-06	Signal Analyzer	R&S	FSV 40	101101	2024-12-06	2025-12-06
SZ062-10	RF Cable	Bedeia	RG 58	--	2025-05-01	2025-11-01
SZ056-08	Signal Analyzer	R&S	FSV 40	101430	2024-12-06	2025-12-06
SZ185-03	EMI Receiver	R&S	ESR7	101975	2025-04-13	2026-04-13
SZ061-06	Active Loop Antenna	Electro-Metrics	EM-6876	217	2024-05-05	2027-05-05
SZ061-13	BiConiLog Antenna	ETS	3142E	00166158	2022-07-13	2025-07-13
SZ061-09	Double-Ridged Waveguide Horn Antenna	ETS	3115	00092347	2022-10-14	2025-10-14
SZ181-08	Microwave System Amplifier	Agilent	83017A	MY57280108	2024-07-29	2025-07-29
SZ188-05	Anechoic Chamber	ETS	FACT 3-2.0	CT001880-Q1391	2021-05-25	2026-05-25
SZ062-35	RF Cable	RADIAL	A50-3.5M 3.5M-8M	-	2024-09-30	2025-09-30
SZ062-30	RF Cable	RADIAL	A50-3.5M 3.5M-4.5M	-	2024-09-30	2025-09-30
SZ062-31	RF Cable	RADIAL	A50-3.5M 3.5M-1M	-	2024-09-30	2025-09-30
SZ067-04	Notch Filter	Micro-Tronics	BRM50702-02	015	2024-04-23	2027-04-23

\*\*\*\*\* End of Report\*\*\*\*\*