

Report on the Radio Testing

For

Sepura Limited

on

SC21 Series (SC2124 Tested)

Report no. TRA-057920-45-07A

15th June 2023

Report Number: TRA-057920-45-07A
Issue: C

REPORT ON THE RADIO TESTING OF A
Sepura Limited
SC21 Series (SC2124 Tested)
WITH RESPECT TO SPECIFICATIONS
FCC 47CFR 15.247 (Limited Testing Only) ISED RSS-247 (Limited Testing Only)
TO SATISFY MODULAR INTEGRATION REQUIREMENTS OF
KDB 996369 D04 v02 and RSP-100, Issue 12

TEST DATE: 2022-06-29

Tested by: D Garvey



Written by:

D Garvey
Radio Test Engineer

Approved by:

D Winstanley
Radio Senior Test Engineer

Date:

15th June 2023

Disclaimers:

- [1] THIS DOCUMENT MAY BE REPRODUCED ONLY IN ITS ENTIRETY AND WITHOUT CHANGE
- [2] THE RESULTS CONTAINED IN THIS DOCUMENT RELATE ONLY TO THE ITEM(S) TESTED



1 Revision Record

<i>Issue Number</i>	<i>Issue Date</i>	<i>Revision History</i>
A	29 th July 2022	Original
B	15th June 2023	Page 4 - FCC ID changed from 'XX6SC2024W' to 'XX6SC2124M' Page 10, Section 7.1 - build changed from 'Model A' to 'PLX-41216515-02 Mod state 14'
C	15 th June 2023	'Maximum peak conducted output power' test result removed as per the request of Sepura Limited

2 Summary

TEST REPORT NUMBER: TRA-057920-45-07A

WORKS ORDER NUMBER: TRA-057920-11

PURPOSE OF TEST: Modular Integration

TEST SPECIFICATION: 47CFR15.247 & RSS-247 (Limited testing only)

EQUIPMENT UNDER TEST (EUT): SC21 Series (SC2124 Tested)

CONTAINS FCC IDENTIFIER: XX6SC2124M

CONTAINS ISED IDENTIFIER: 8739A-SC2124M

EUT SERIAL NUMBER: 1PR0006494I

MANUFACTURER/AGENT: Sepura Limited

ADDRESS: 9000 Cambridge Research Park
Beach Drive
Waterbeach
Cambridge
CB25 9TL
United Kingdom

CLIENT CONTACT: James O'Reilly
☎ 01223 876000
✉ James.OReilly@sepura.com

ORDER NUMBER: PLC-PO022335-1

TEST DATE: 2022-06-29

TESTED BY: D Garvey
Element

2.1 Test Summary

Test Method and Description		Requirement Clause 47CFR15	Requirement Clause RSS	Applicable to this equipment	Result / Note
Radiated spurious emissions (restricted bands of operation and cabinet radiation)		15.247 (d)	247, 3.3	<input checked="" type="checkbox"/>	Pass
AC power line conducted emissions		15.207	Gen, 8.8	<input type="checkbox"/>	Note 1
Occupied bandwidth		15.247 (a) (2)	247, 5.2 (a)	<input type="checkbox"/>	Note 1
Conducted carrier power	Peak	15.247 (b) (3)	247, 5.4 (d)	<input type="checkbox"/>	Note 1
	Max.			<input type="checkbox"/>	
Out of band emissions		15.247 (d)	247, 5.5	<input type="checkbox"/>	Note 1
Power spectral density		15.247 (e)	247, 5.2 (b)	<input type="checkbox"/>	Note 1
Calculation of duty correction		-	15.35 (c)	<input checked="" type="checkbox"/>	N/A

Specific Note:

1. Limited testing was performed to check transmitter radiated spurious emissions only on a single channel and mode, as requested by the client, to satisfy modular integration requirements of KDB996369 D04 v02 and RSP-100.

General Notes:

The results contained in this report relate only to the items tested, in the condition at time of test, and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

The apparatus was set up and exercised using the configurations, modes of operation and arrangements defined in this report only. Any modifications made are identified in Section 8 of this report.

Particular operating modes, apparatus monitoring methods and performance criteria required by the standards tested to have been performed except where identified in Section 5.2 of this test report (Deviations from Test Standards).

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4 Introduction

This report TRA-057920-45-07A presents the results of the Radio testing on a Sepura Limited, SC21 Series (SC2124 Tested) to specifications 47CFR15 Radio Frequency Devices (limited testing) and RSS-247 - Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices (limited testing).

The testing was carried out for Sepura Limited by Element, at the address detailed below.

Element Hull
Unit E
South Orbital Trading Park
Hedon Road
Hull
HU9 1NJ
UK

Element Skelmersdale
Unit 1
Pendle Place
Skelmersdale
West Lancashire
WN8 9PN
UK

This report details the configuration of the equipment, the test methods used and any relevant modifications where appropriate.

All test and measurement equipment under the control of the laboratory and requiring calibration is subject to an established programme and procedures to control and maintain measurement standards. The quality management system meets the principles of ISO 9001, and has quality control procedures for monitoring the validity of tests undertaken. Records and sufficient detail are retained to establish an audit trail of calibration records relating to its test results for a defined period. Under control of the established calibration programme, key quantities or values of the test & measurement instrumentation are within specification and comply with the relevant traceable internationally recognised and appropriate standard specifications, which are UKAS calibrated as such where these properties have a significant effect on results. Participation in inter-laboratory comparisons and proficiency testing ensures satisfactory correlation of results conform to Elements own procedures, as well as statistical techniques for analysis of test data providing the appropriate confidence in measurements.

Throughout this report EUT denotes equipment under test.

FCC Site Listing:

The test laboratory is accredited for the above sites under the following US-UK MRA, Designation numbers.

Element Hull UK2007

ISED Registration Numbers:

Element Hull 3483A

The test site requirements of ANSI C63.4-2014 are met up to 1 GHz.

The test site SVSWR requirements of CISPR 16-1-4:2010 are met over the frequency range 1 GHz to 18 GHz.

5 Test Specifications

5.1 *Normative References*

- FCC 47 CFR Ch. I – Part 15 – Radio Frequency Devices.
- ISED RSS-247, Issue 2, February 2017 – Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices.
- ISED RSS-Gen, Issue 5, March 2019 – General Requirements for Compliance of Radio Apparatus.
- ANSI C63.10-2013 – American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.
- ANSI C63.4-2014 – 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.
- KDB996369 D04 Module Integration Guide v02 – Modular Transmitter Integration Guide - Guidance for Host Product Manufacturers.
- RSP-100, Issue 12, August 2019 – Certification of Radio Apparatus and Broadcasting Equipment.

5.2 *Deviations from Test Standards*

Limited testing was performed to check transmitter radiated spurious emissions only, as requested by the client, to satisfy modular integration requirements of KDB996369 D04 v02 and RSP-100, Issue 12

6 Glossary of Terms

§	denotes a section reference from the standard, not this document
AC	Alternating Current
ANSI	American National Standards Institute
BW	bandwidth
C	Celsius
CFR	Code of Federal Regulations
CW	Continuous Wave
dB	decibel
dBm	dB relative to 1 milliwatt
DC	Direct Current
DSSS	Direct Sequence Spread Spectrum
EIRP	Equivalent Isotropically Radiated Power
ERP	Effective Radiated Power
EUT	Equipment under Test
FCC	Federal Communications Commission
FHSS	Frequency Hopping Spread Spectrum
Hz	hertz
IC	Industry Canada
ITU	International Telecommunication Union
LBT	Listen before Talk
m	metre
max	maximum
MIMO	Multiple Input and Multiple Output
min	minimum
MRA	Mutual Recognition Agreement
N/A	Not Applicable
PCB	Printed Circuit Board
PDF	Portable Document Format
Pt-mpt	Point-to-multipoint
Pt-pt	Point-to-point
RF	Radio Frequency
RH	Relative Humidity
RMS	Root Mean Square
Rx	receiver
s	second
SVSWR	Site Voltage Standing Wave Ratio
Tx	transmitter
UKAS	United Kingdom Accreditation Service
V	volt
W	watt
Ω	ohm

7 Equipment under Test

7.1 EUT Identification

- Name: SC21 Series (SC2124 Tested)
- Serial Number: 1PR0006494I
- Model Number: SC2124
- Software Revision: 2001 723 07367
- Build Level / Revision Number: PLX-41216515-02 Mod state 14

7.2 System Equipment

Equipment listed below forms part of the overall test setup and is required for equipment functionality and/or monitoring during testing. The compliance levels achieved in this report relate only to the EUT and not items given in the following list.

*Element Laptop
USB programming cable*

7.3 EUT Mode of Operation

The unit was connected via the USB lead and scripts, provided by the manufacturer, were sent to the EUT via a terminal program. The unit was put into a mode transmitting a modulated signal on the required frequencies.

7.4 EUT Radio Parameters

Frequency of operation:	2402 MHz to 2480 MHz
Declared output power:	10 dBm EIRP
Antenna type and gain:	Integral PCB 1.3 dBi
Nominal supply voltage:	7.4 Vdc (from rechargeable battery)

7.5 EUT Description

The EUT is a TETRA hand held portable radio with BT, BLE, 2.4 GHz WiFi and GNSS.

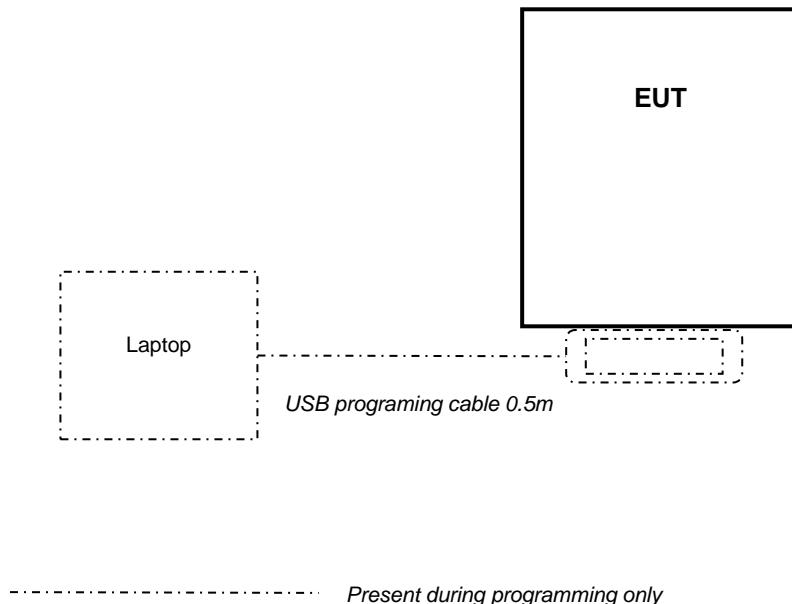
8 Modifications

No modifications were performed during this assessment.

9 EUT Test Setup

9.1 *Block Diagram*

The following diagram shows basic EUT interconnections:



9.2 General Set-up Photograph

The following photograph shows basic EUT set-up:



9.3 *Measurement Software*

Where applicable, the following software was used to perform measurements contained within this report.

Element Emissions R5

10 General Technical Parameters

10.1 *Normal Conditions*

The EUT was tested under the normal environmental conditions of the test laboratory, except where otherwise stated. The normal power source applied was 7.4 Vdc from the lithium polymer rechargeable battery.

11 Radiated emissions

11.1 Definitions

Spurious emissions

Emissions on a frequency or frequencies, which are outside the necessary bandwidth and the level of which may be reduced without affecting the corresponding transmission of information. Spurious emissions include harmonic emissions, parasitic emissions, intermodulation products and frequency conversion products, but exclude out-of-band emissions.

Restricted bands

A frequency band in which intentional radiators are permitted to radiate only spurious emissions but not fundamental signals.

11.2 Test Parameters

Test Location:	Element Hull
Test Chamber:	Wireless Lab 3
Test Standard and Clause:	ANSI C63.10-2013, Clause 6.5 and 6.6
EUT Frequencies Measured:	2402 MHz, 2442 MHz & 2480 MHz
Deviations from Standard:	None
Measurement BW:	30 MHz to 1 GHz: 120 kHz; Above 1 GHz: 1 MHz
Measurement Detector:	Up to 1 GHz: Quasi-Peak; Above 1 GHz: CISPR average and Peak

Environmental Conditions (Normal Environment)

Temperature: 21 °C	+15 °C to +35 °C (as declared)
Humidity: 40 %RH	20 %RH to 75 %RH (as declared)
Supply: 7.4 Vdc	As declared

Test Limits

Unwanted emissions that fall within the restricted frequency bands shall comply with the limits specified:

General Field Strength Limits for License-Exempt Transmitters at Frequencies above 30 MHz

Frequency (MHz)	Field Strength (µV/m at 3 m)	Field Strength (dBµV/m at 3 m)
30 to 88	100	40.0
88 to 216	150	43.5
216 to 960	200	46.0
Above 960	500	54.0

On frequencies below or equal to 1000 MHz, the limits shown are based on measuring equipment employing a CISPR quasi-peak detector function. On frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. The limit on peak radio frequency emissions is 20 dB above the maximum permitted average emission limit.

11.3 Test Method

With the EUT setup as per section 9 of this report and connected as per Figure i, the emissions from the EUT were measured on a spectrum analyzer / EMI receiver.

Radiated electromagnetic emissions from the EUT are checked first by preview scans. Preview scans for all spectrum and modulation characteristics are checked, using a peak detector and where applicable worst-case determined for function, operation, orientation, etc. for both vertical and horizontal polarisations. Pre-scan plots are shown with a peak detector and 100 kHz RBW.

If the EUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in ANSI C63.10 are followed. Alternatively, a layout closest to normal use (as declared by the provider) is employed, (see EUT setup photographs for more detail).

Emissions between 30 MHz and 1 GHz are measured using calibrated broadband antennas. Emissions above 1 GHz are characterized using standard gain horn antennas. Pre-amplifiers and filters are used where required. Care is taken to ensure that test receiver resolution bandwidth, video bandwidth and detector type(s) meet the regulatory requirements.

For both horizontal and vertical polarizations, the EUT is then rotated through 360 degrees in azimuth until the highest emission is detected. At the previously determined azimuth the test antenna is raised and lowered from 1 to 4 m in height until a maximum emission level is detected, this maximum value is recorded.

Power values measured on the test receiver / analyzer are converted to field strength, FS, in dB μ V/m at the regulatory distance, using:

$$FS = PR + CL + AF - PA + DC - CF$$

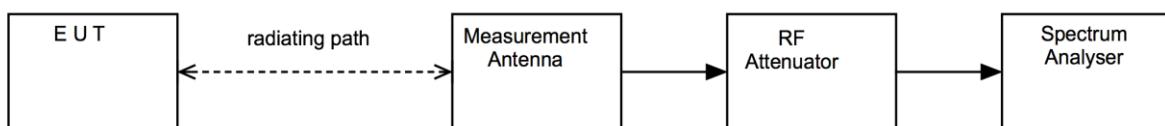
Where,

PR is the power recorded on the receiver / spectrum analyzer in dB μ V;
 CL is the cable loss in dB;
 AF is the test antenna factor in dB/m;
 PA is the pre-amplifier gain in dB (where used);
 DC is the duty correction factor in dB (where used, e.g. harmonics of pulsed fundamental);
 CF is the distance factor in dB (where measurement distance different to limit distance);

$$\text{Factor} = CL + AF - PA$$

This field strength value is then compared with the regulatory limit.

Figure i Test Setup



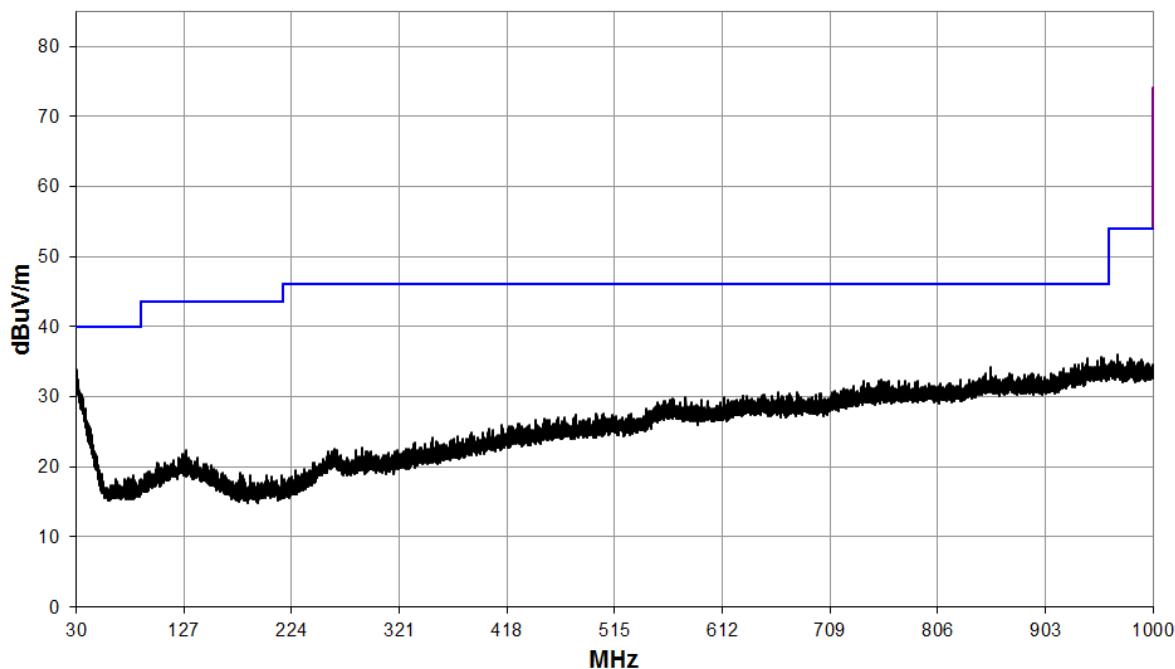
11.4 Test Equipment

Equipment Type	Manufacturer	Equipment Description	Element No	Due For Calibration
Ferrite Lined Chamber	Rainford	Chamber	REF2259	2022-08-03
EMI Test Receiver	R&S	ESW26	REF2235	2022-10-05
Bilog Antenna	Chase	CBL6111B	REF2233	2022-09-17
LB-10180-NF	A Info Inc	Horn Antenna	REF2241	2024-07-11
LB-90-25-C2-SF	A Info Inc	Horn Antenna	REF2243	2024-07-12
LB-62-25-C-SF	A Info Inc	Horn Antenna	REF2244	2024-07-11
LB-180400-25-C-KF	A Info Inc	Horn Antenna	REF2246	2022-07-28
Emissions R5	Element	Radiated Test Software	REF9000	Cal not required
4478	BSC	Band Stop Filter	REF2158	Calibrate in use

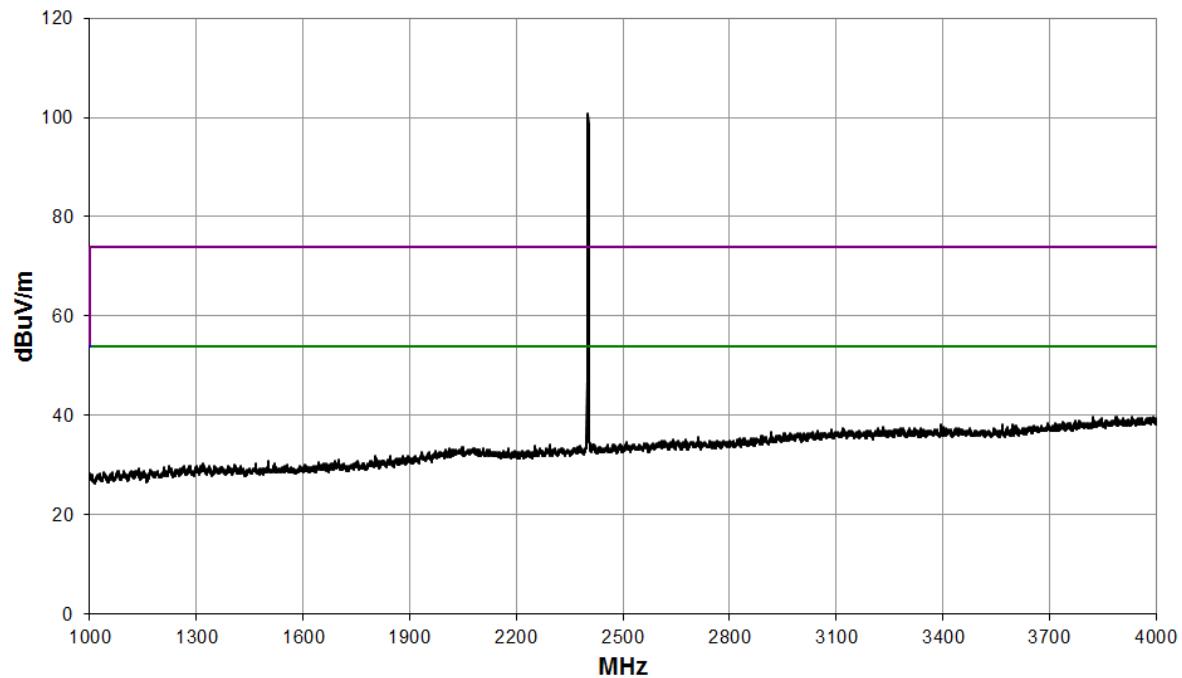
11.5 Test Results

Frequency: 2402 MHz; Power Setting: Default; Modulation: BLE								
Detector	Freq. (MHz)	Meas'd Emission (dB μ V)	Factor (dB)	Duty Cycle Corr'n (dB)	Distance Extrap'n Factor (dB)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
No spurious emissions were detected within 20 dB of the limit.								

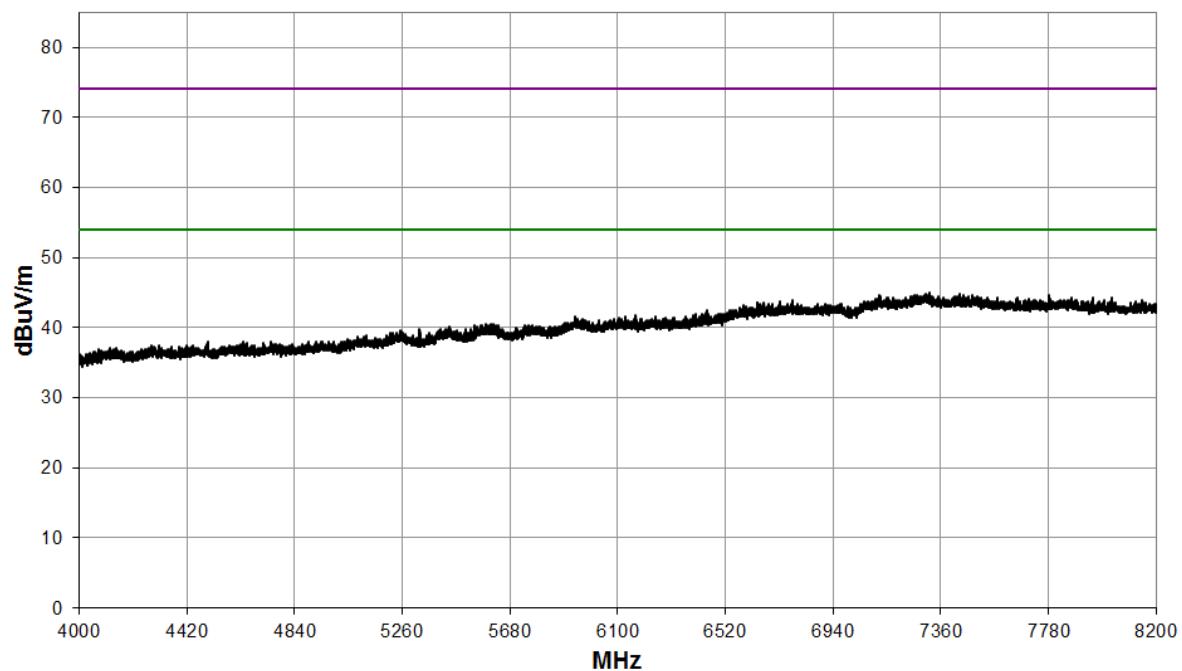
30 MHz to 1 GHz



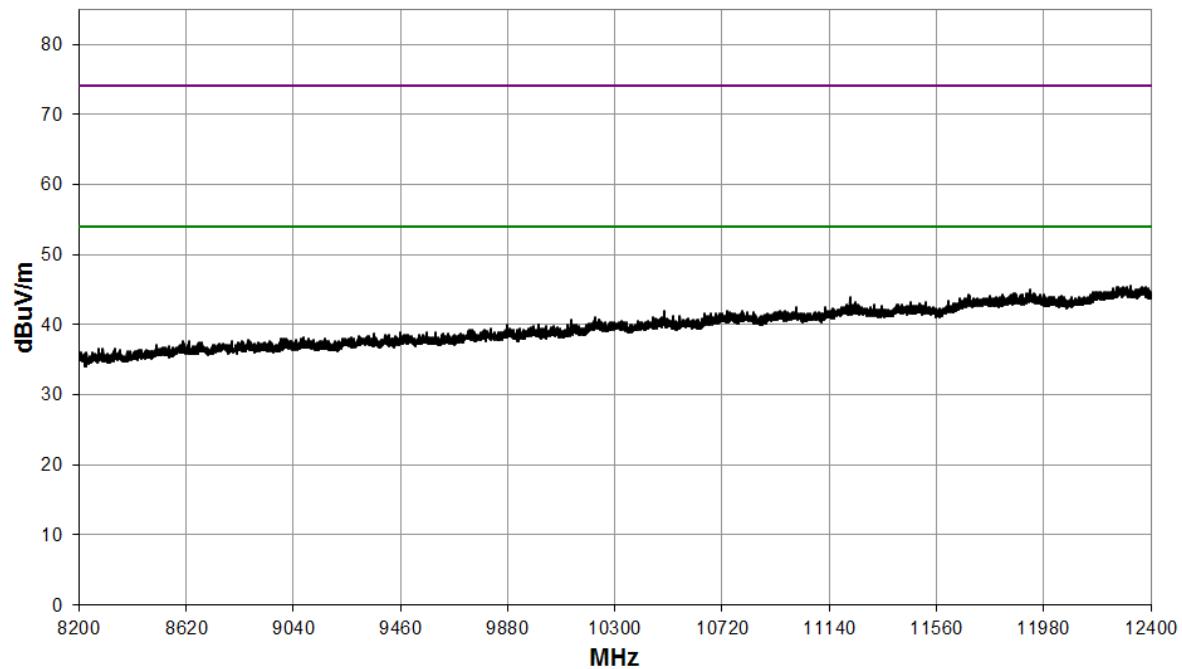
1 GHz to 4 GHz



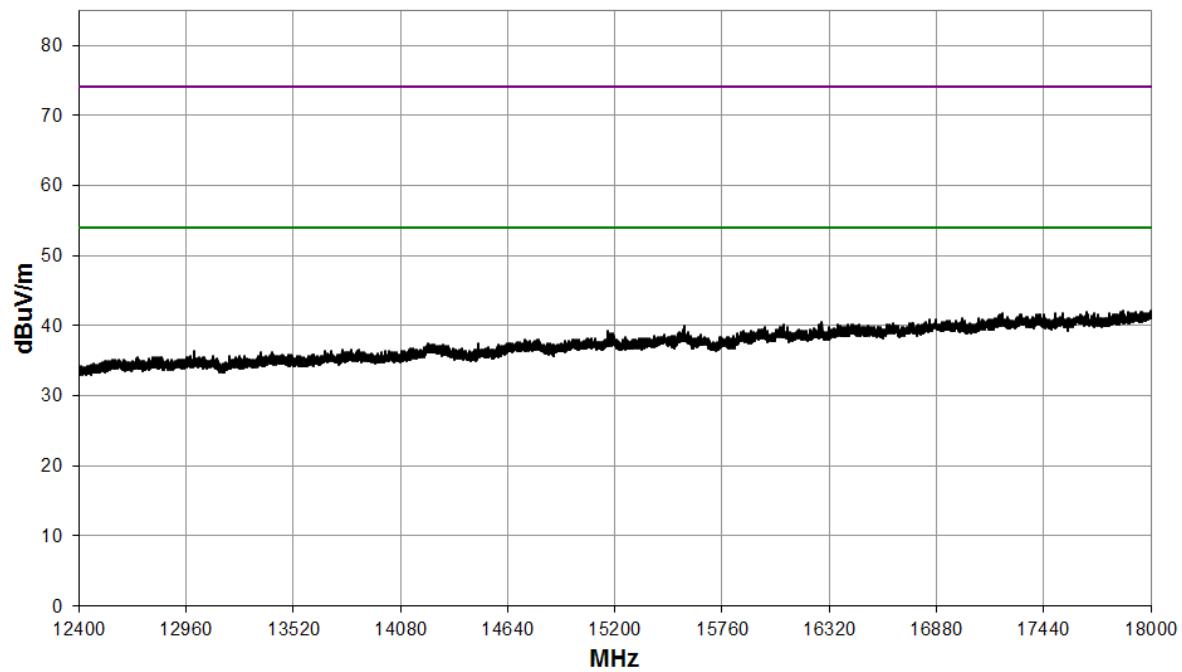
4 GHz to 8.2 GHz



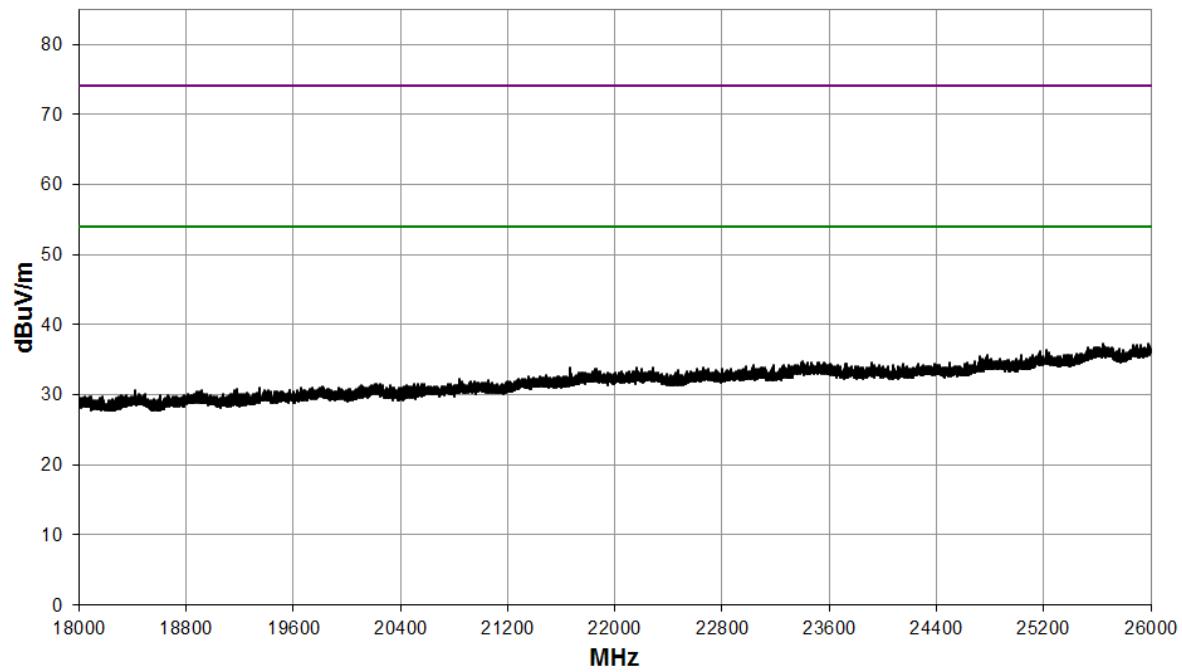
8.2 GHz to 12.4 GHz



12.4 GHz to 18 GHz

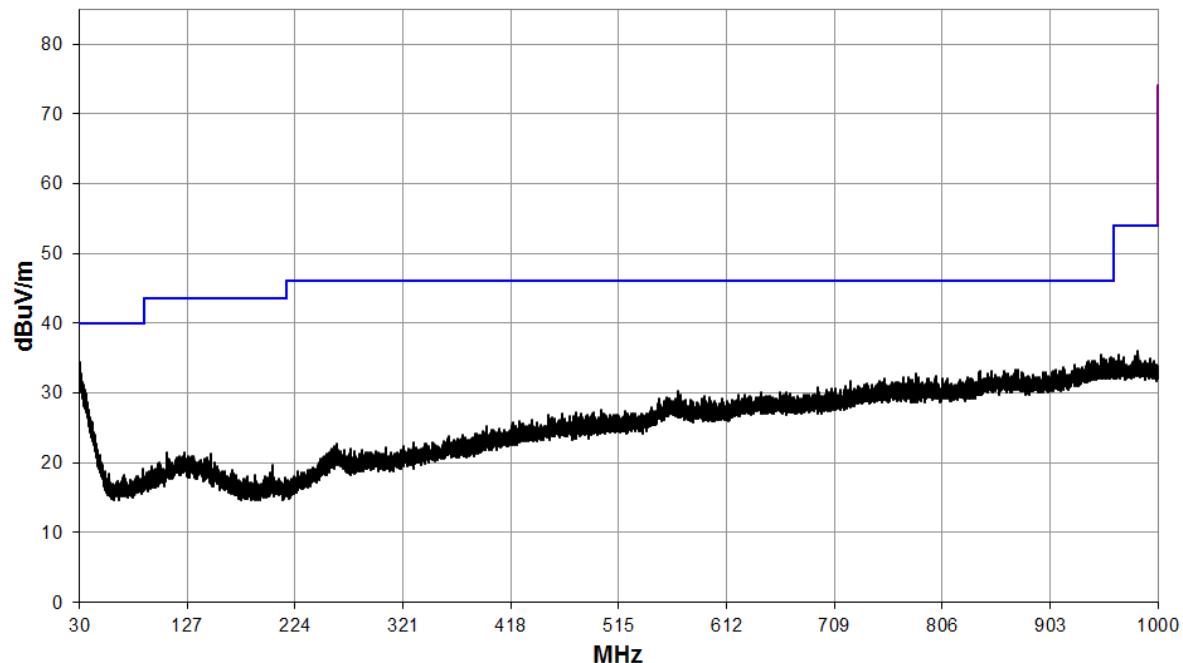


18 GHz to 26 GHz

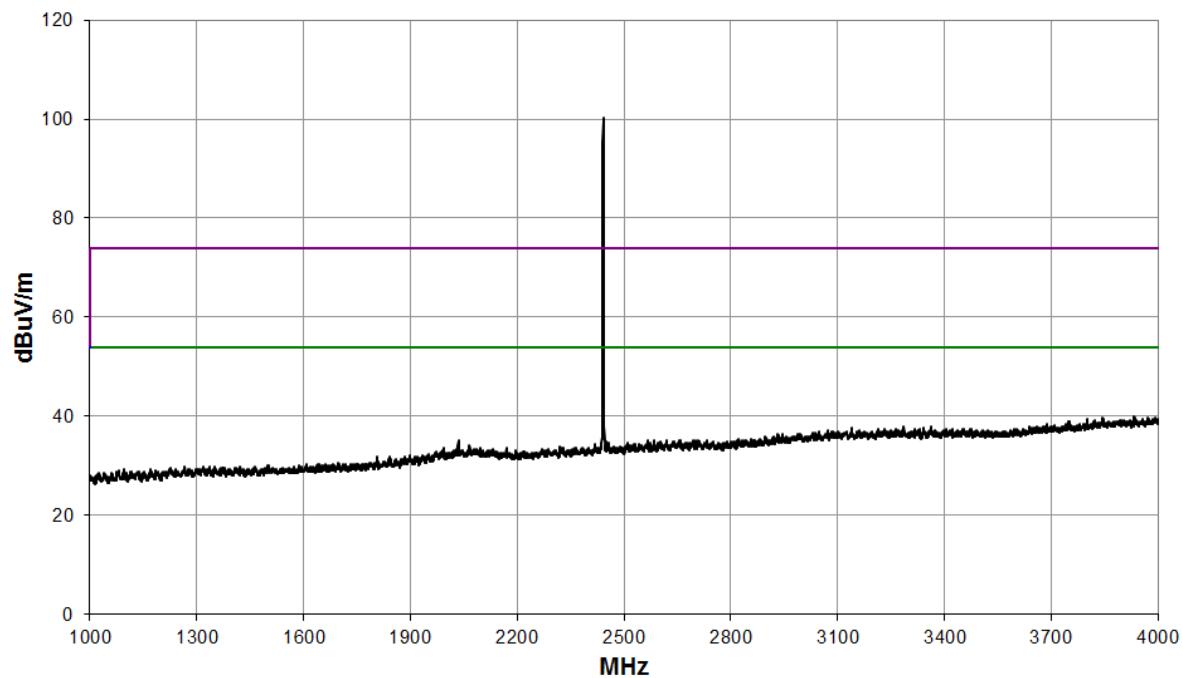


Frequency: 2442 MHz; Power Setting: Default; Modulation: BLE								
Detector	Freq. (MHz)	Meas'd Emission (dB μ V)	Factor (dB)	Duty Cycle Corr'n (dB)	Distance Extrap'n Factor (dB)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
No spurious emissions were detected within 20 dB of the limit.								

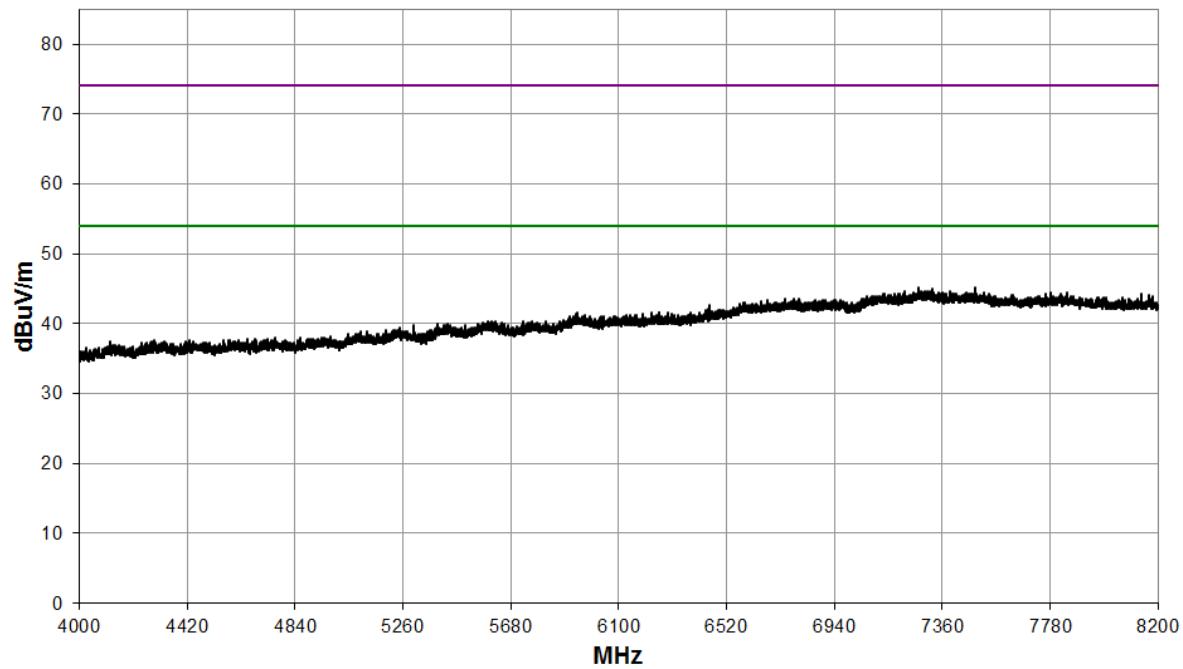
30 MHz to 1 GHz



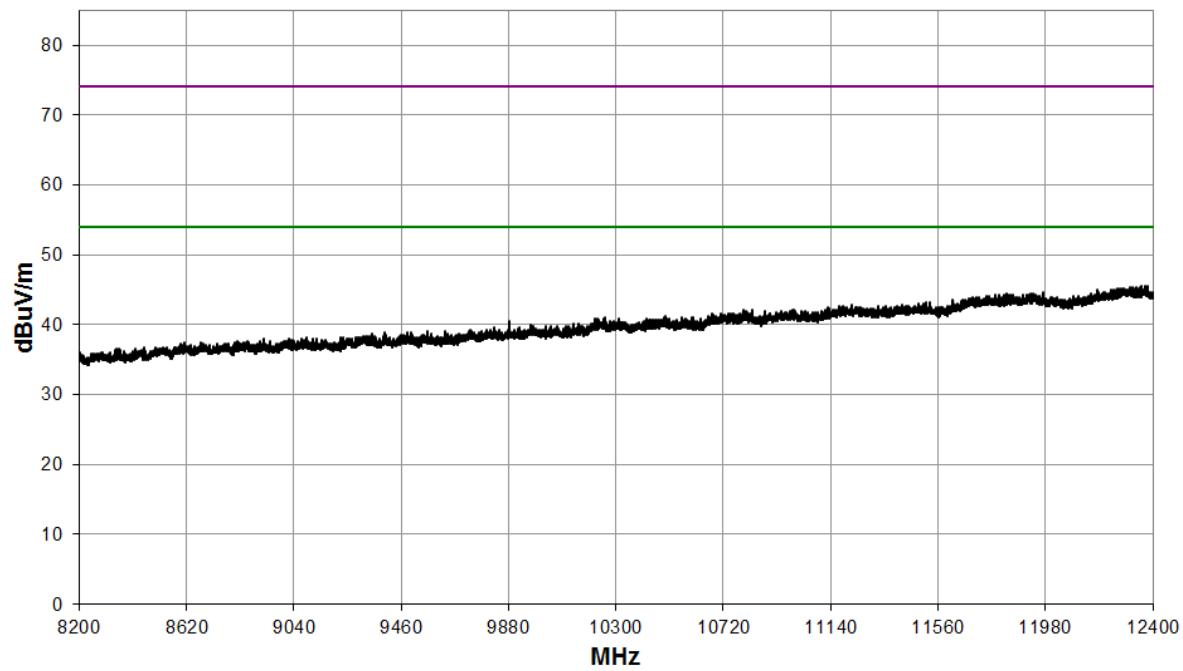
1 GHz to 4 GHz



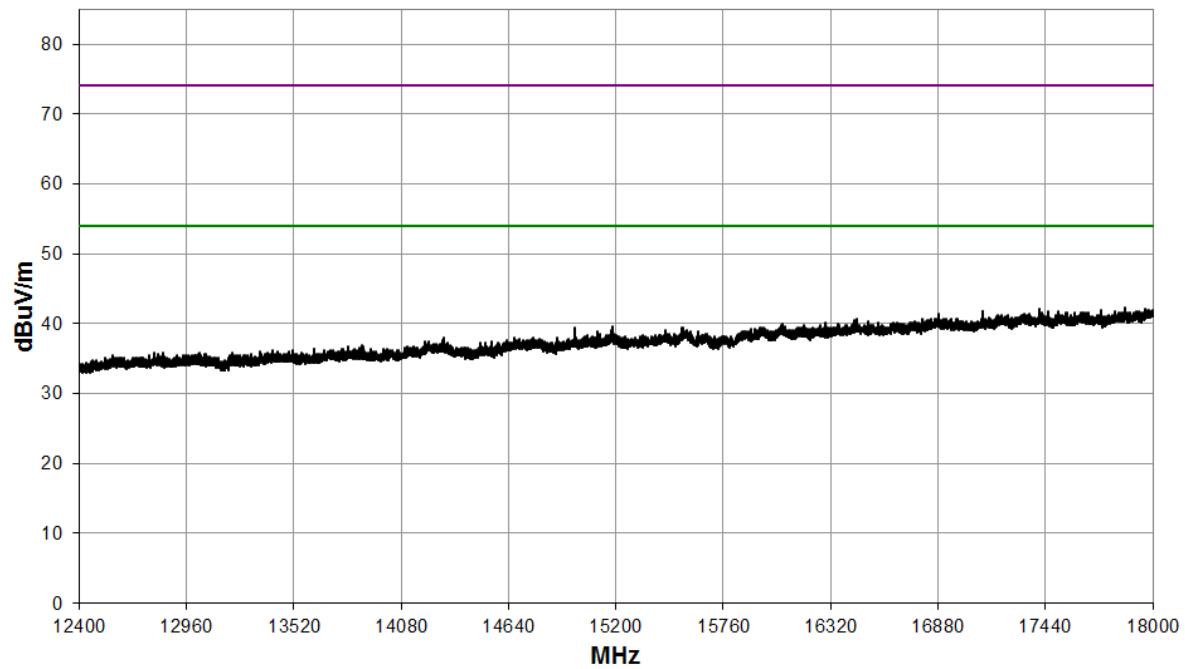
4 GHz to 8.2 GHz



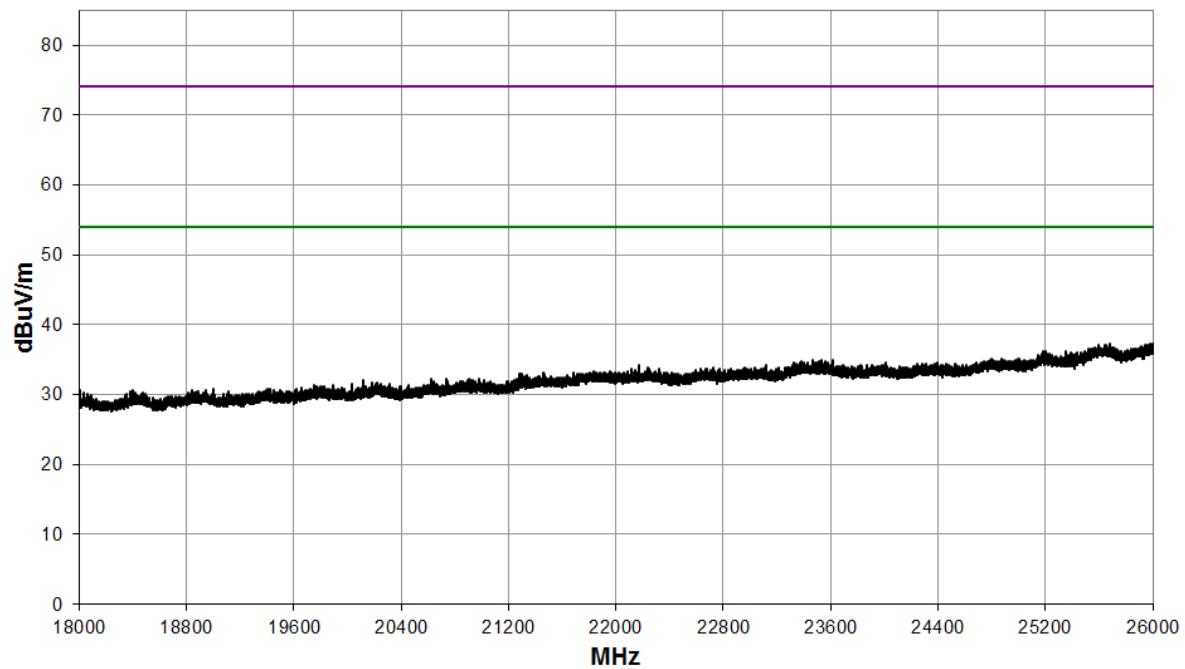
8.2 GHz to 12.4 GHz



12.4 GHz to 18 GHz

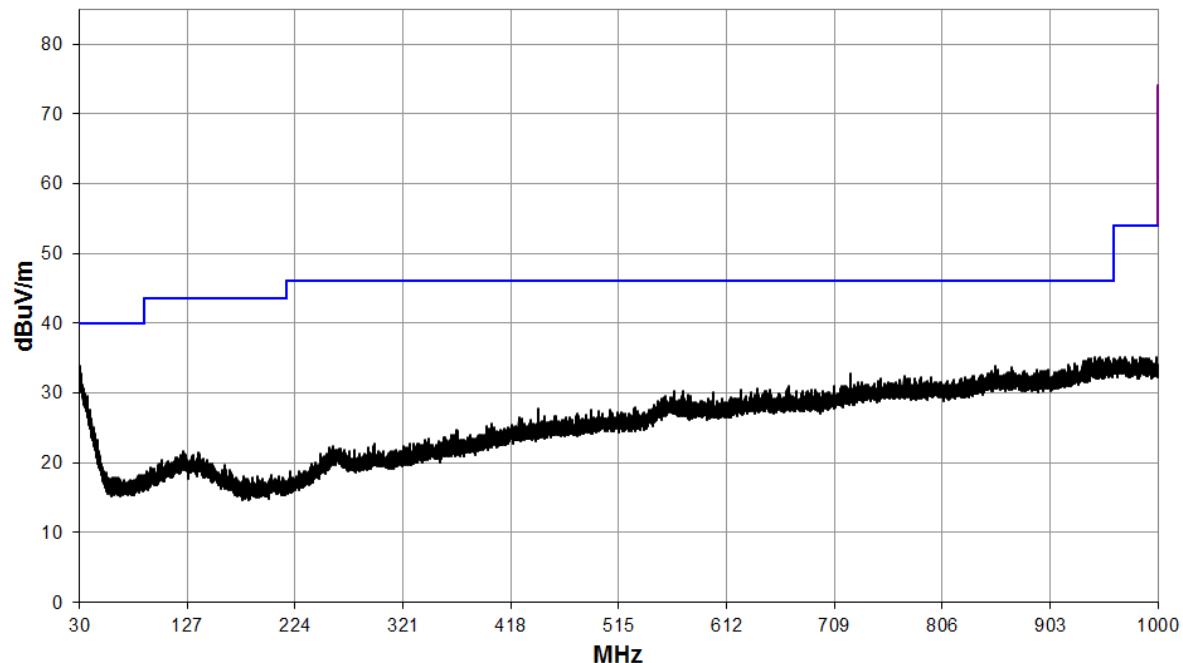


18 GHz to 26 GHz

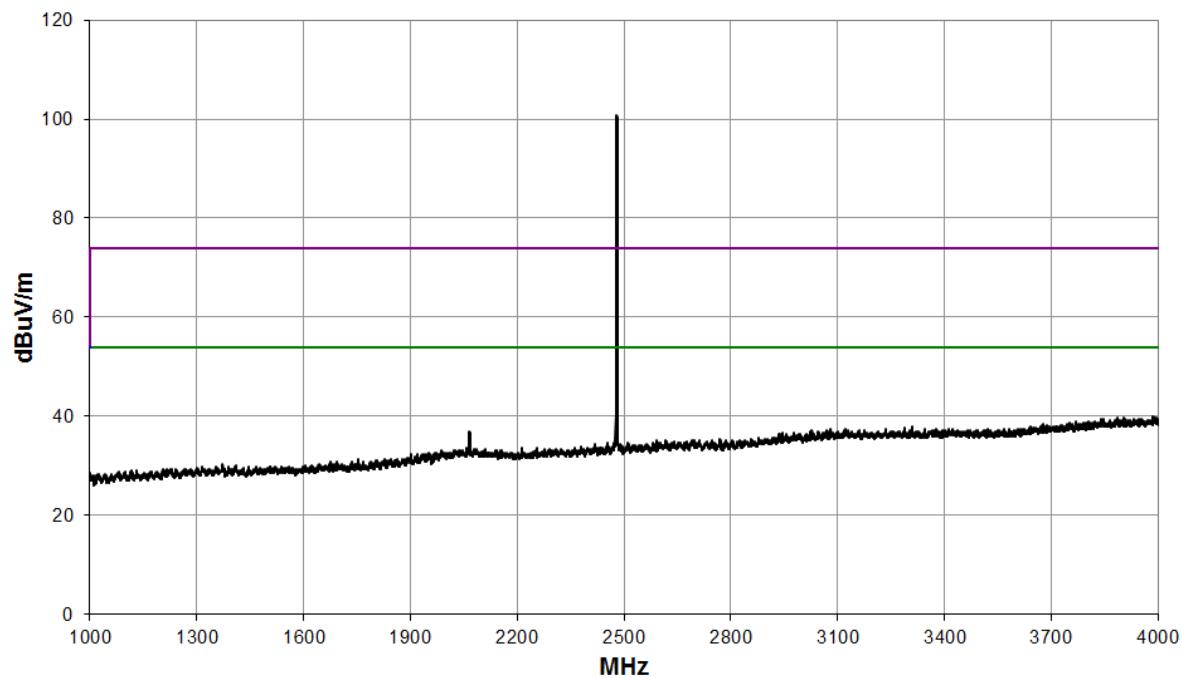


Frequency: 2480 MHz; Power Setting: Default; Modulation: BLE								
Detector	Freq. (MHz)	Meas'd Emission (dB μ V)	Factor (dB)	Duty Cycle Corr'n (dB)	Distance Extrap'n Factor (dB)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
No spurious emissions were detected within 20 dB of the limit.								

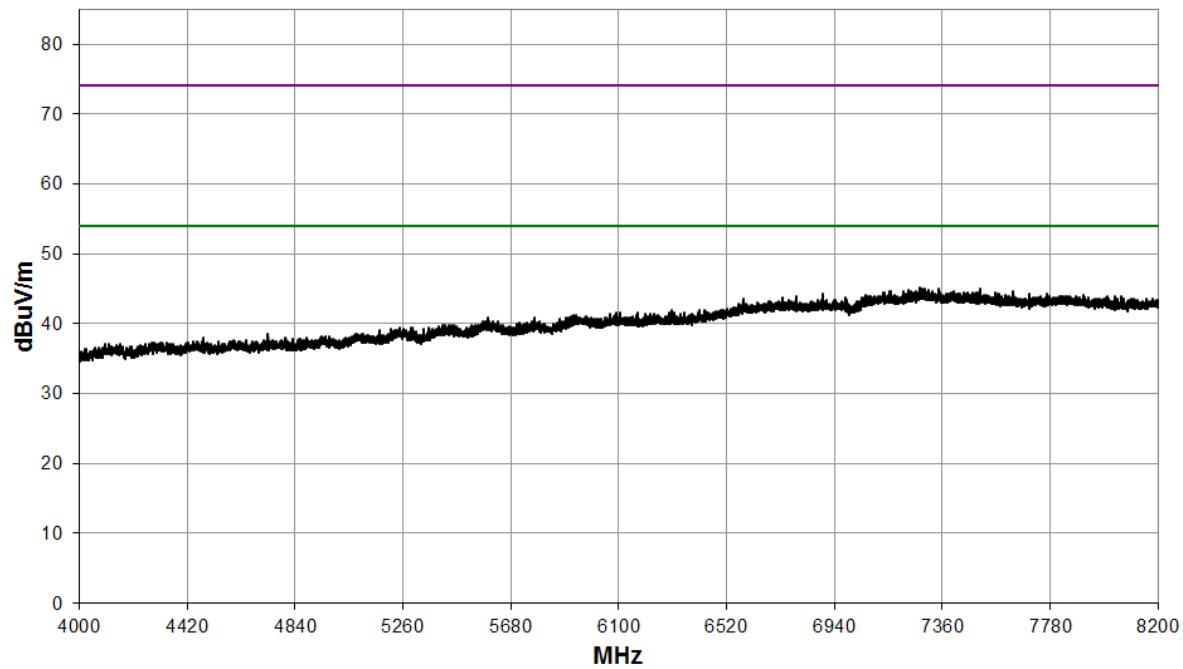
30 MHz to 1 GHz



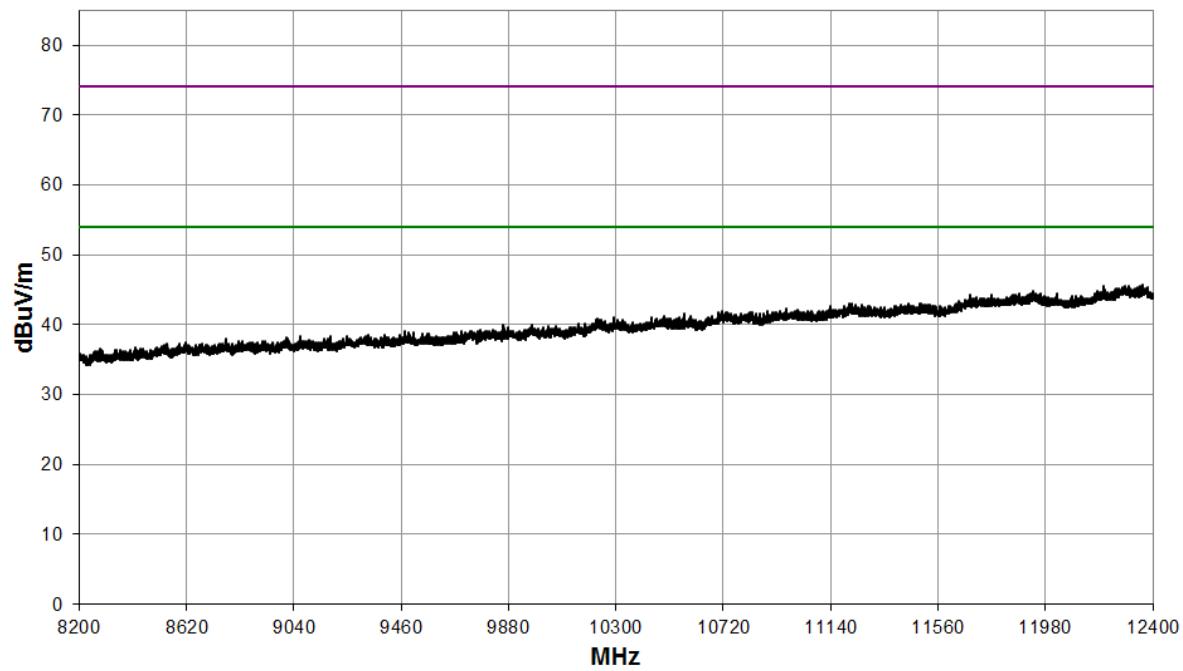
1 GHz to 4 GHz



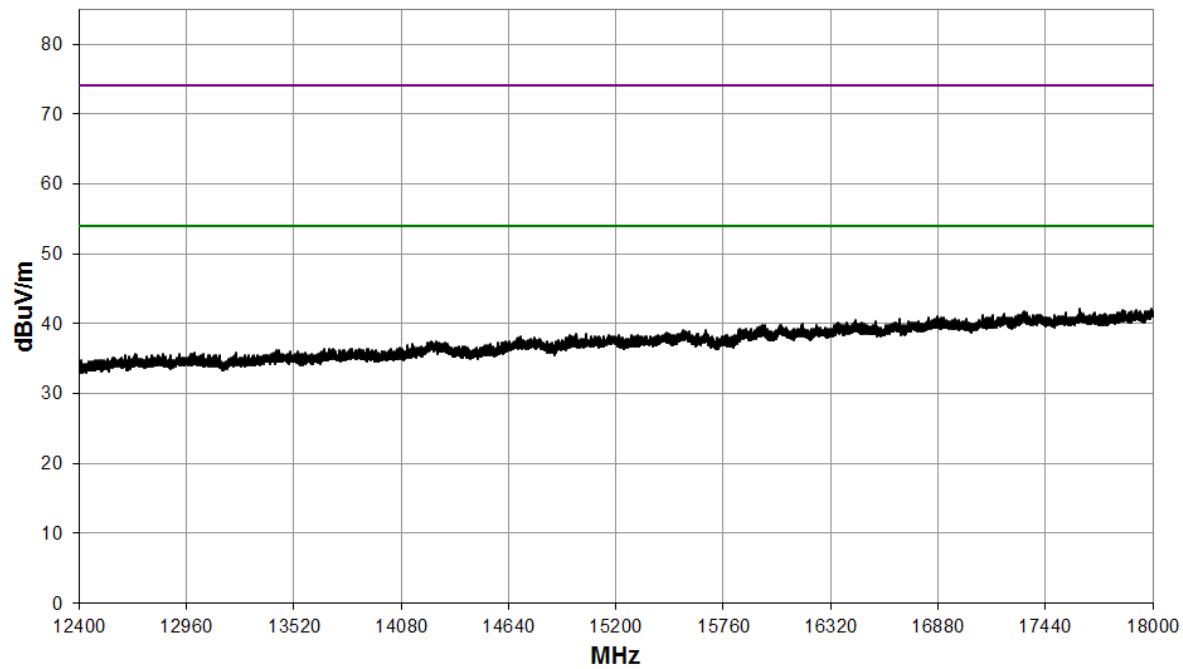
4 GHz to 8.2 GHz



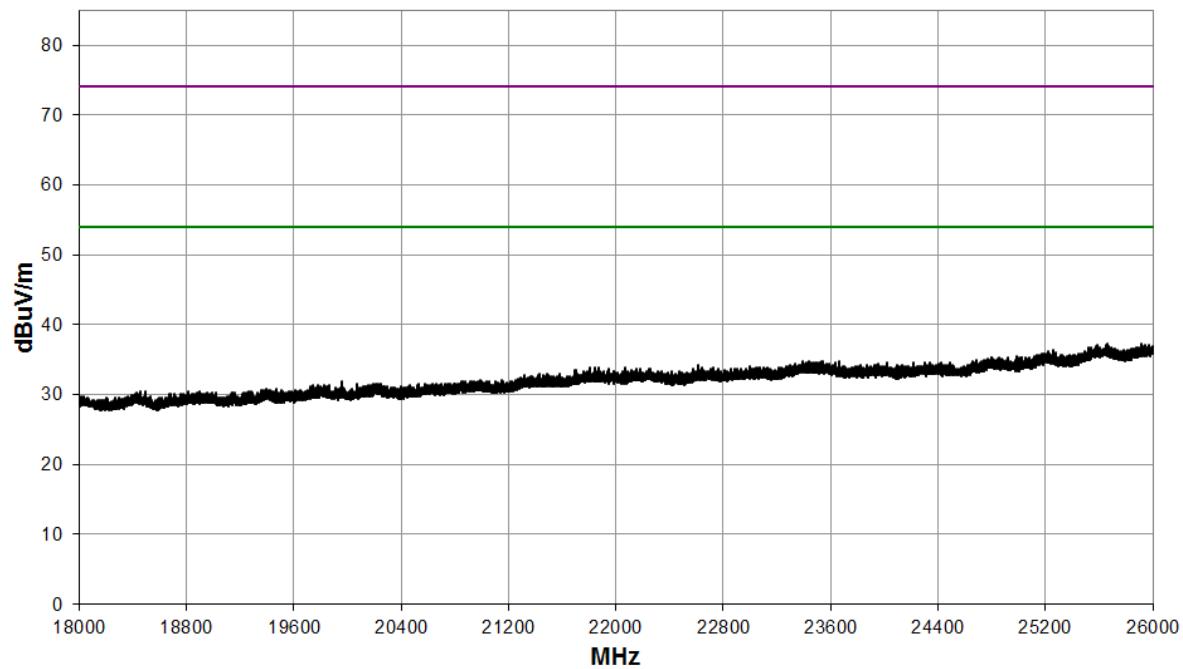
8.2 GHz to 12.4 GHz



12.4 GHz to 18 GHz

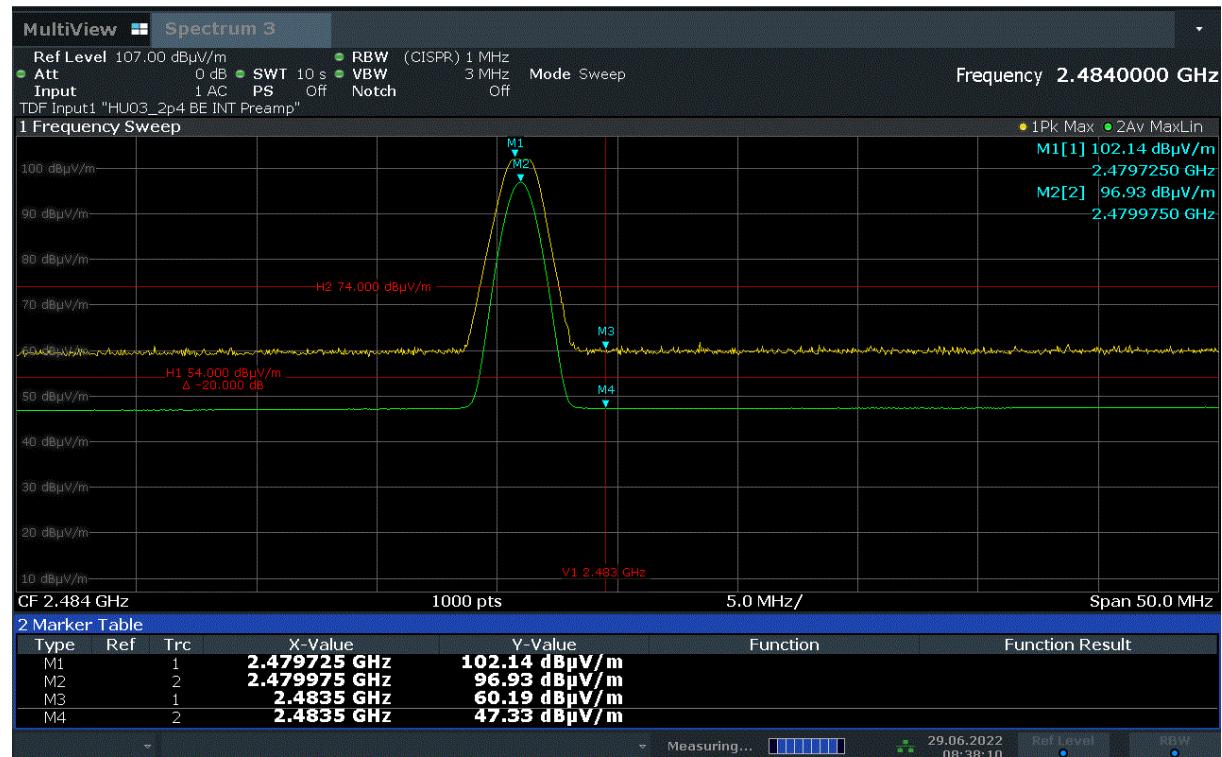


18 GHz to 26 GHz



Band Edge

Element



08:38:10 29.06.2022

Band Edge Measurement; Frequency: 2480 MHz; Power Setting: Default						
Detector	Freq. (MHz)	Meas'd Emission (dB μ V/m)	Duty Cycle Corr'n (dB)	Field Strength (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
AV	2483.5	47.33	4.1	51.43	54.0	2.57

12 Duty Cycle

12.1 *Definition*

The ratio of the sum of all pulse durations to the total period, during a specified period of operation.

12.2 *Test Parameters*

Test Location:	Element Hull
Test Chamber:	Wireless Lab 3
Test Standard and Clause:	ANSI C63.10-2013, Clause 11.6
Deviations From Standard:	None
Temperature Extreme Environment Test Range:	N/A
Voltage Extreme Environment Test Range:	N/A

Environmental Conditions (Normal Environment)

Temperature: 21 °C	+15 °C to +35 °C (as declared)
Humidity: 40 %RH	20 %RH to 75 %RH (as declared)
Supply: 7.4 Vdc	As declared

Test Limits

N/A.

12.3 Test Method

With the EUT setup as per section 9 of this report and connected as per Figure vii, the duty of the EUT was calculated from the sum of total on and off times over the observation period.

The measurements were performed with EUT set at its maximum duty. All modulation schemes, bandwidths, data rates and power settings were measured

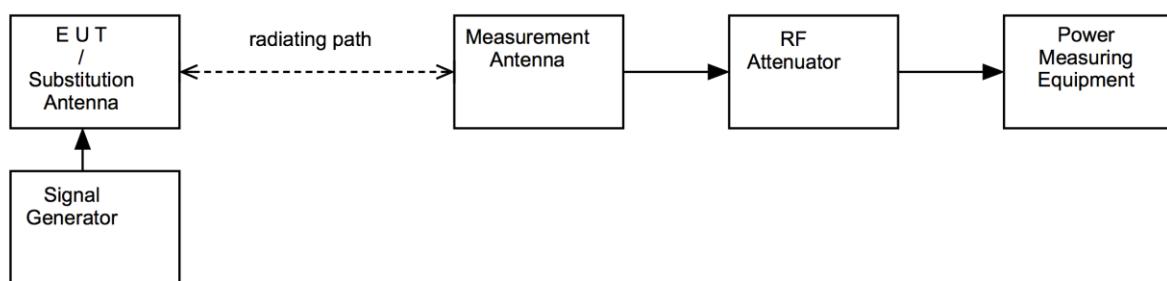
[1] Single antenna output devices

Duty was measured at a distance of 3 m.

The duty cycle correction factor, DC, shall be added to the measurement results prior to comparing with the emission limit to compute the emission level that would have been measured had the test been performed at 100% duty cycle. The correction factor is computed as:

- 1) If power averaging (rms) mode was used in step f), then the applicable correction factor is $[10 \log (1 / D)]$, where D is the duty cycle.
- 2) If linear voltage averaging mode was used in step f), then the applicable correction factor is $[20 \log (1 / D)]$, where D is the duty cycle.
- 3) If a specific emission is demonstrated to be continuous ($D \geq 98\%$) rather than turning ON and OFF with the transmit cycle, then no duty cycle correction is required for that emission.

Figure vii Test Setup



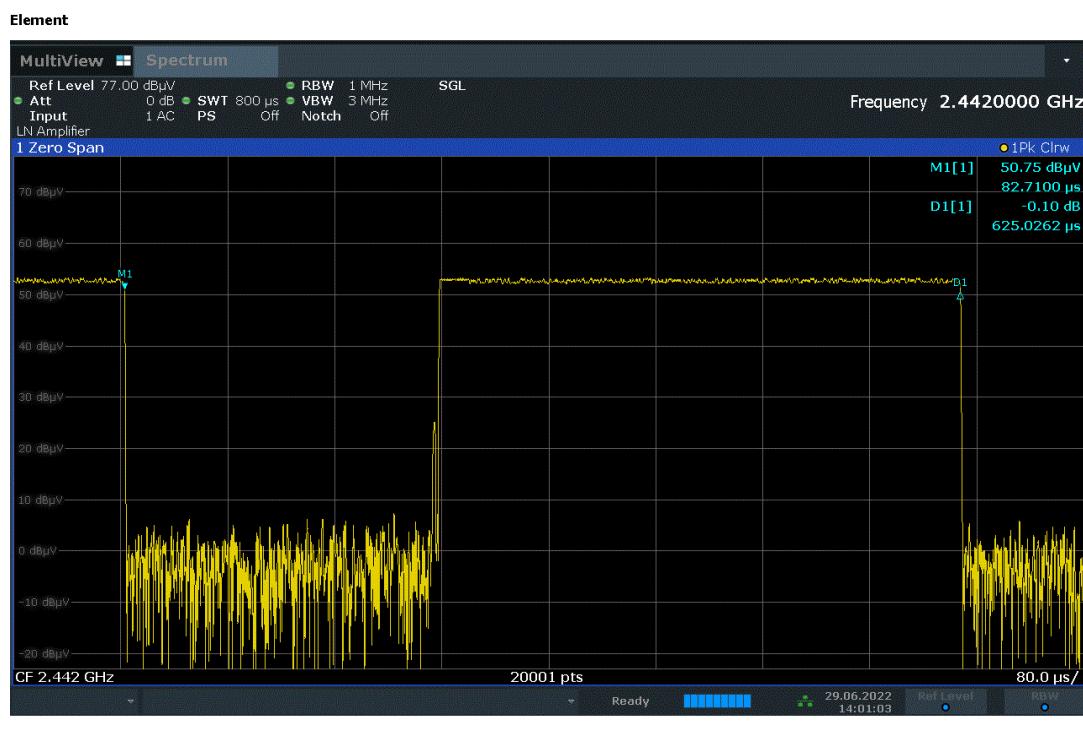
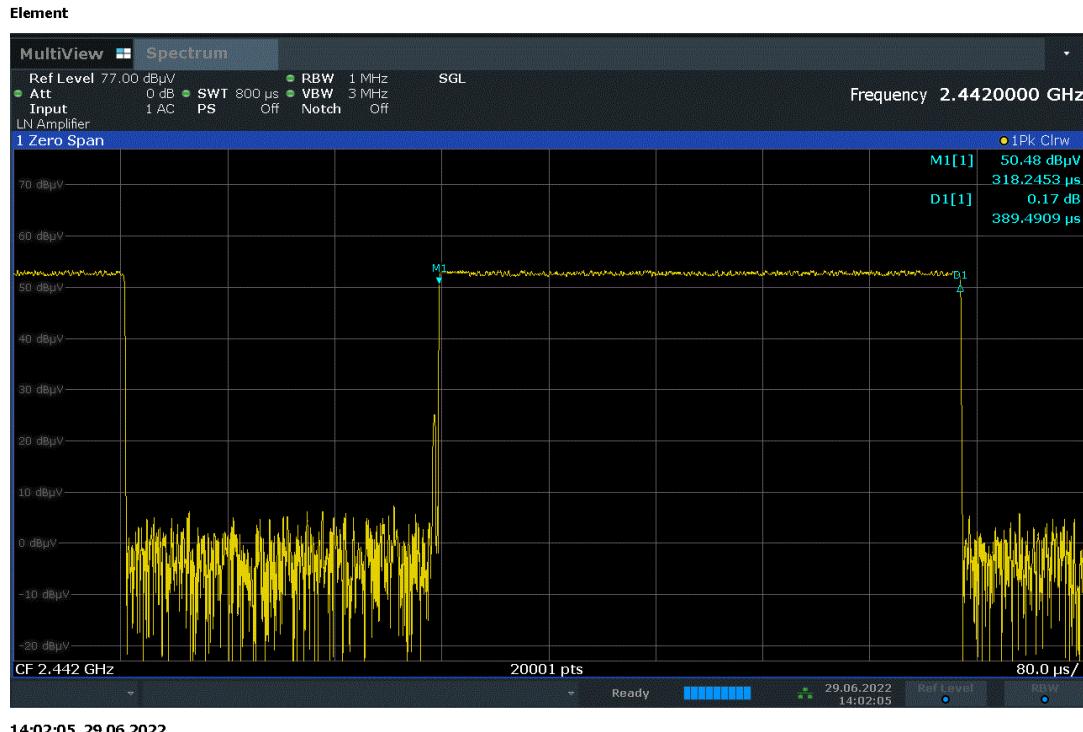
12.4 Test Equipment

Equipment Type	Manufacturer	Equipment Description	Element No	Due For Calibration
Ferrite Lined Chamber	Rainford	Chamber	REF2259	2022-08-03
EMI Test Receiver	R&S	ESW26	REF2235	2022-10-05
LB-10180-NF	A Info Inc	Horn Antenna	REF2241	2022-07-13

12.5 Test Results

2.4 GHz BLE; Power Setting: Default

Test Environment	TxOn time (us)	Frame Period (us)	Calculated Factor (dB)
V _{nominal}	T _{nominal}	389.4909	625.0262



13 Measurement Uncertainty

Radio Testing – General Uncertainty Schedule

All statements of uncertainty are expanded standard uncertainty using a coverage factor of 1.96 to give a 95 % confidence where no required test level exists.

Test/Measurement	Budget Number	MU
Conducted RF Power, Power Spectral Density, Adjacent Channel Power and Spurious emissions		
Absolute RF power (via antenna connector) Dare RPR3006W Power Head	MU4001	0.9 dB
Carrier Power and PSD - Spectrum Analysers	MU4004	0.9 dB
Adjacent Channel Power	MU4002	1.9 dB
Transmitter conducted spurious emissions	MU4041	0.9 dB
Conducted power and spurious emissions 40 GHz to 50 GHz	MU4042	2.4 dB
Conducted power and spurious emissions 50 GHz to 75 GHz	MU4043	2.5 dB
Conducted power and spurious emissions 75 GHz to 110 GHz	MU4044	2.4 dB
Radiated RF Power and Spurious emissions ERP and EIRP		
Effective Radiated Power Reverb Chamber	MU4020	3.7 dB
Effective Radiated Power	MU4021	4.7 dB
TRP Emissions 30 MHz to 1 GHz using CBL6111 or CBL6112 Bilog Antenna	MU4046	5.3 dB
TRP Emissions 1 GHz to 18 GHz using HL050 Log Periodic Antenna	MU4047	5.1 dB
TRP Emissions 18 GHz to 26.5 GHz using Standard Gain Horn	MU4048	2.7 dB
TRP Emissions 26.5 GHz to 40 GHz using Standard Gain Horn	MU4049	2.7 dB
Spurious Emissions Electric and Magnetic Field		
Radiated Spurious Emissions 30 MHz to 1 GHz	MU4037	4.7 dB
Radiated Spurious Emissions 1-18 GHz	MU4032	4.5 dB
E Field Emissions 18GHz to 26 GHz	MU4024	3.2 dB
E Field Emissions 26GHz to 40 GHz	MU4025	3.3 dB
E Field Emissions 40GHz to 50 GHz	MU4026	3.5 dB
E Field Emissions 50GHz to 75 GHz	MU4027	3.6 dB
E Field Emissions 75GHz to 110 GHz	MU4028	3.6 dB
Radiated Magnetic Field Emissions	MU4031	2.3 dB
Frequency Measurements		
Frequency Deviation	MU4022	0.316 kHz
Frequency error using CMTA test set	MU4023	113.441 Hz
Frequency error using GPS locked frequency source	MU4045	0.0413 ppm
Bandwidth/Spectral Mask Measurements		
Channel Bandwidth	MU4005	3.87 %
Transmitter Mask Amplitude	MU4039	1.3 dB
Transmitter Mask Frequency	MU4040	2.59 %
Time Domain Measurements		
Transmission Time	MU4038	4.40 %
Dynamic Frequency Selection (DFS) Parameters		
DFS Analyser - Measurement Time	MU4006	679 µs
DFS Generator - Frequency Error	MU4007	92 Hz
DFS Threshold Conducted	MU4008	1.3 dB
DFS Threshold Radiated	MU4009	3.2 dB

Test/Measurement	Budget Number	MU
Receiver Parameters		
EN300328 Receiver Blocking	MU4010	1.1 dB
EN301893 Receiver Blocking	MU4011	1.1 dB
EN303340 Adjacent Channel Selectivity	MU4012	1.1 dB
EN303340 Overloading	MU4013	1.1 dB
EN303340 Receiver Blocking	MU4014	1.1 dB
EN303340 Receiver Sensitivity	MU4015	0.9 dB
EN303372-1 Image Rejection	MU4016	1.4 dB
EN303372-1 Receiver Blocking	MU4017	1.1 dB
EN303372-2 Adjacent Channel Selectivity	MU4018	1.1 dB
EN303372-2 Dynamic Range	MU4019	0.9 dB
Receiver Blocking Talk Mode Conducted	MU4033	1.2 dB
Receiver Blocking Talk Mode- radiated	MU4034	3.4 dB
Rx Blocking, listen mode, blocking level	MU4035	3.2 dB
Rx Blocking, listen mode, radiated Threshold Measurement	MU4036	3.4 dB
Adjacent Sub Band Selectivity	MU4003	4.2 dB

14 Customer Declaration

27 July 2022

sepura

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Declaration no performance differences of Bluetooth, Wi-Fi and GNSS between SC21 models.

SC21 series radios including the following models but not limited to SC2120, SC2124 & SC2128 use the same Bluetooth & Wi-Fi module (LBEE59B1LV-TEMP) along with a new GNSS module (u-blox m10). The electronic implementation/design of these parts in each model of SC21 radios are identical and no performance difference between them. the only difference between each model is the Tetra frequency range.

Signed for and on behalf of Sepura Limited:



James O'Reilly
Conformance engineer

Dated: 27 July 2022



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