



Measurement of RF Interference from an TTF0014-04 Swim Device Rev. 5 Transceiver

For : Twisthink, LLC
: 130 Central Avenue, Suite 400
: Holland, MI

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: Subpart C, Section 15.247 Digital
: Modulation Intentional Radiators Operating within
: The band 2400-2483.5MHz
: FCC "Code of Federal Regulations" Title 47, Part 15,
: Subpart B, For Receivers

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THIS REPORT SHALL NOT BE REPRODUCED, EXCEPT IN FULL, WITHOUT THE WRITTEN APPROVAL OF ELITE ELECTRONIC ENGINEERING INCORPORATED.



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REVISION HISTORY

Revision	Date	Description
—	July 20, 2010	Initial release



Measurement of RF Emissions from a TTF0014-04 Swim Device Rev. 5, Transceiver

1 INTRODUCTION

1.1 Scope of Tests

This document represents the results of the series of radio interference measurements performed on a Twisthink, LLC Swim Device Rev. 5, Model No. TTF0014-04, Serial No. 020-9820, transceiver (hereinafter referred to as the test item). The test item is digital modulation transceiver. The test item was designed to transmit and receive in the 2405MHz to 2480MHz band using an internal antenna. The test item was manufactured and submitted for testing by Twisthink, LLC located in Holland, MI.

1.2 Purpose

The test series was performed to determine if the test item meets the conducted and radiated RF emission requirements of the FCC "Code of Federal Regulations" Title 47, Part 15, Subpart C, Sections 15.207 and 15.247 for Intentional Radiators. The test series was also performed to determine if the test item meets the conducted and radiated RF emission requirements of the FCC "Code of Federal Regulations" Title 47, Part 15, Subpart B, Sections 15.107 and 15.109 for Receivers. Testing was performed in accordance with ANSI C63.4-2003.

1.3 Deviations, Additions and Exclusions

There were no deviations, additions to, or exclusions from the test specification during this test series

1.4 EMC Laboratory Identification

This series of tests was performed by Elite Electronic Engineering Incorporated of Downers Grove, Illinois. The laboratory is accredited by the National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP). NVLAP Lab Code: 100278-0.

1.5 Laboratory Conditions

The temperature at the time of the test was 22C and the relative humidity was 56%.

2 APPLICABLE DOCUMENTS

The following documents of the exact issue designated form part of this document to the extent specified herein:

- Federal Communications Commission "Code of Federal Regulations", Title 47, Part 15, Subpart C, dated 1 October 2009
- ANSI C63.4-2003, "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"
- Measurement of Digital Transmission Systems Operating under Section 15.247 March 23, 2005

3 TEST ITEM SET-UP AND OPERATION

3.1 General Description

The test item is a TTF0014-04 Swim Device Rev. 5 transceiver. A block diagram of the test item setup is shown as Figure 1 and Figure 2.

3.1.1 Power Input

The test item was powered by 4.0VDC from an internal lithium battery.

3.1.2 Peripheral Equipment

The test item was submitted for testing with no peripheral equipment.

3.1.3 Interconnect Cables

The test item was submitted for testing with no interconnect cables.

3.1.4 Grounding

The test item was not grounded during the tests.

3.2 Operational Mode

For all tests, the test item was placed on an 80cm high non-conductive stand. The test item was energized. The unit was programmed to operate separately in one of the following modes:

- Transmit at 2405MHz, Power Level = 1
- Transmit at 2440MHz, Power Level = 1
- Transmit at 2480MHz, Power Level = 1

3.3 Test Item Modifications

No modifications were required for compliance.

4 TEST FACILITY AND TEST INSTRUMENTATION

4.1 Shielded Enclosure

All tests were performed in a 32ft. x 20ft. x 18ft. hybrid ferrite-tile/anechoic absorber lined test chamber. With the exception of the floor, the reflective surfaces of the shielded chamber are lined with ferrite tiles on the walls and ceiling. Anechoic absorber material is installed over the ferrite tile. The floor of the chamber is used as the ground plane. The chamber complies with ANSI C63.4-2003 for site attenuation.

4.2 Test Instrumentation



The test instrumentation and auxiliary equipment used during the tests are listed in Table 9-1. All equipment was calibrated per the instruction manuals supplied by the manufacturer.

Conducted emission tests and radiated emissions tests were performed with an EMI receiver. This receiver allows measurements with the bandwidths specified by the FCC and with the quasi-peak and average detector functions. The spectrum analyzer bandwidth was 9kHz for conducted emissions data, 120kHz for the 30MHz to 1000MHz radiated emissions data, and 1MHz for radiated emissions data above 1GHz.

4.3 Calibration Traceability

Test equipment is maintained and calibrated on a regular basis. All calibrations are traceable to the National Institute of Standards and Technology (NIST).

4.4 Measurement Uncertainty

All measurements are an estimate of their true value. The measurement uncertainty characterizes, with a specified confidence level, the spread of values which may be possible for a given measurement system.

The measurement uncertainty for these tests is presented below:

Conducted Emission Measurements		
Combined Standard Uncertainty	1.07	-1.07
Expanded Uncertainty (95% confidence)	2.1	-2.1

Radiated Emission Measurements		
Combined Standard Uncertainty	2.26	-2.18
Expanded Uncertainty (95% confidence)	4.5	-4.4

5 TEST PROCEDURES

5.1 Receiver

Per the FCC "Code of Federal Regulations" Title 47, Part 15, Subpart B, Section 15.101(b), receivers operating above 960MHz are exempt from complying with the technical provisions of part 15.

5.2 Transmitter

5.2.1 Powerline Conducted Emissions

5.2.1.1 Requirements

Since the test item was powered by internal batteries, no conducted emissions tests were performed.

5.2.2 6dB Bandwidth

5.2.2.1 Requirements

Per 15.247(a)(2), the minimum 6dB bandwidth shall be at least 500kHz for all systems using digital modulation techniques.

5.2.2.2 Procedures

The test item was setup inside the chamber.

The test item was allowed to transmit continuously. The transmit channel was set separately to low, middle, and high channels. The resolution bandwidth (RBW) was set to 100kHz and the span was set to greater than the RBW.

The 'Max-Hold' function was engaged. The analyzer was allowed to scan until the envelope of the transmitter bandwidth was defined. The analyzer's display was plotted using a 'screen dump' utility.

5.2.2.3 Results

The plots on pages 21 through 23 show that the minimum 6 dB bandwidth was 1.68MHz which is greater than minimum allowable 6dB bandwidth requirement of 500kHz for systems using digital modulation techniques.

5.2.3 Peak Output Power

5.2.3.1 Requirements

Per section 15.247(b)(3), for systems using digital modulation the maximum peak output conducted power shall not be greater than 1.0W (30dBm). Per section 15.247(b)(4), this limit is based on the use of antennas with directional gains that do not exceed 6dBi. Since the limit allows for a 6dBi antenna gain, the maximum EIRP can be increased by 6dB to 4 Watt (36dBm).

5.2.3.2 Procedures

The test item was placed on the non-conductive stand and set to transmit. A double ridged waveguide antenna was placed at a test distance of 3 meters from the test item. The resolution bandwidth (RBW) of the spectrum analyzer was set to greater than the 6dB bandwidth. The test item was maximized for worst case emissions (or maximum output power) at the measuring antenna. The maximum meter reading was recorded. The peak power output was measured for the low, middle and high channels.

The equivalent power was determined from the field intensity levels measured at 3 meters using the substitution method. To determine the emission power, a second double ridged waveguide antenna was then set in place of the test item and connected to a calibrated signal generator. The output of the signal generator was adjusted to match the received level at the spectrum analyzer. The signal level was recorded. The reading was then corrected to compensate for cable loss and antenna gain as required. The peak power output was calculated for low, middle, and high hopping frequencies.

5.2.3.3 Results

The results are presented on page 24. The maximum EIRP measured from the transmitter was 12.1dBm or 16.2mW which is below the 4 Watt limit.

5.2.4 Duty Cycle Factor Measurements

5.2.4.1 Procedures

The duty cycle factor is used to convert peak detected readings to average readings. This factor is computed from the time domain trace of the pulse modulation signal.

With the transmitter set up to transmit for maximum pulse density, the time domain trace is displayed on the spectrum analyzer. This trace is obtained by tuning the center frequency of the spectrum analyzer to the transmitter frequency and then setting a zero span width with 0.1msec/div. The amplitude settings are adjusted so that the on/off transitions clear the 7th division from the bottom of the display. The markers are set at the beginning and end of the "on-time". The trace is recorded.

Next the spectrum analyzer center frequency is set to the transmitter frequency with a zero span width and 10msec/div. This shows if the word is longer than 100msec or shorter than 100msec. If the word period is greater than 100msec, the display is set to show 100msec. The on-time is then measured. The on-time is total time signal level exceeds the 7th division. Off-time is time under for the word period. The duty cycle is then computed as the (On-time/100msec).

5.2.4.2 Results

The plots of the duty cycle are shown on data pages 25 and 26. The test item transmits a 867.7usec pulse every 250msec. Since a word is greater than 100 msec long, the duty cycle factor was computed over a 100msec interval. The duty cycle correction factor was calculated to be -41.2dB ($-41.2\text{dB} = 20 \cdot \log(867.7\text{usec}/100\text{msec})$).

5.2.5 Spurious Emissions

5.2.5.1 Radiated Spurious Emissions

5.2.5.1.1 Requirements

Per section 15.247(d), in any 100kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated emissions measurement. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must comply with the radiated emission limits specified in §15.209(a).

Paragraph 15.209(a) has the following radiated emission limits:

Frequency MHz	Field Strength (microvolts/meter)	Measurement distance (meters)
0.009-0.490	2400/F(kHz)	300
0.490-1.705	24000/F(kHz)	30
1.705-30.0	30	3
30.0-88.0	100	3
88.0-216.0	150	3
216.0-960.0	200	3
Above 960	500	3

5.2.5.1.2 Procedures

Radiated measurements were performed in a 32ft. x 20ft. x 14ft. high shielded enclosure. The shielded enclosure prevents emissions from other sources, such as radio and TV stations from interfering with the measurements. All powerlines and signal lines entering the enclosure pass through filters on the enclosure wall. The powerline filters prevent extraneous signals from entering the enclosure on these leads.

Preliminary radiated emissions tests were performed to determine the emission characteristics of the test item. For the preliminary test, a broadband measuring antenna was positioned at a 3 meter distance from the test item. The entire frequency range from 30MHz to 25GHz was investigated using a peak detector function.

The final open field emission tests were then manually performed over the frequency range of 30MHz to 25GHz.

- 1) For all harmonics not in the restricted bands, the following procedure was used:
 - a) The field strength of the fundamental was measured using a double ridged waveguide antenna. The waveguide antenna was positioned at a 3 meter distance from the test item. A peak detector with a resolution bandwidth of 100 kHz was used on the spectrum analyzer.
 - b) The field strengths of all of the harmonics not in the restricted band were then measured using a double-ridged waveguide antenna. The waveguide antenna was positioned at a 3 meter distance from the test item. A peak detector with a resolution bandwidth of 100 kHz was used on the spectrum analyzer.
 - c) To ensure that maximum or worst case emission levels at the fundamental and harmonics were measured, the following steps were taken when measuring the fundamental emissions and the spurious emissions:
 - i) The test item was rotated so that all of its sides were exposed to the receiving antenna.
 - ii) Since the measuring antenna is linearly polarized, both horizontal and vertical field components were measured.
 - iii) The measuring antenna was raised and lowered for each antenna polarization to maximize the readings.
 - iv) In instances where it was necessary to use a shortened cable between the measuring antenna and the spectrum analyzer, the measuring antenna was not raised or lowered to ensure maximized readings. Instead the test item was rotated through all axes to ensure the maximum readings were recorded for the test item.
 - d) All harmonics not in the restricted bands must be at least 20 dB below levels measured at the fundamental. However, attenuation below the general limits specified in §15.209(a) is not required.

- 2) For all emissions in the restricted bands, the following procedure was used:
- a) The field strengths of all emissions below 1 GHz were measured using a bi-log antenna. The bi-log antenna was positioned at a 3 meter distance from the test item. A peak detector with a resolution bandwidth of 100 kHz was used on the spectrum analyzer.
 - b) The field strengths of all emissions above 1 GHz were measured using a double-ridged waveguide antenna. The waveguide antenna was positioned at a 3 meter distance from the test item. A peak detector with a resolution bandwidth of 1 MHz was used on the spectrum analyzer.
 - c) To ensure that maximum or worst case emission levels were measured, the following steps were taken when taking all measurements:
 - i) The test item was rotated so that all of its sides were exposed to the receiving antenna.
 - ii) Since the measuring antenna is linearly polarized, both horizontal and vertical field components were measured.
 - iii) The measuring antenna was raised and lowered for each antenna polarization to maximize the readings.
 - iv) In instances where it was necessary to use a shortened cable between the measuring antenna and the spectrum analyzer, the measuring antenna was not raised or lowered to ensure maximized readings. Instead the test item was rotated through all axis to ensure the maximum readings were recorded for the test item.
 - d) For all radiated emissions measurements below 1 GHz, if the peak reading is below the limits listed in 15.209(a), no further measurements are required. If however, the peak readings exceed the limits listed in 15.209(a), then the emissions are remeasured using a quasi-peak detector.
 - e) For all radiated emissions measurements above 1 GHz, the peak readings must comply with the 15.35(b) limits. 15.35(b) states that when average radiated emissions measurements are specified, there also is a limit on the peak level of the radiated emissions. The limit on the peak radio frequency emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test. Therefore, all peak readings above 1 GHz must be no greater than 20 dB above the limits specified in 15.209(a).
 - f) Next, for all radiated emissions measurements above 1GHz, the resolution bandwidth was set to 1MHz. The analyzer was set to linear mode with a 10Hz video bandwidth in order to simulate an average detector. An average reading was taken. If the emission is pulsed, the reading can be adjusted by a "duty cycle correction factor" derived from $20 \cdot \log(\text{on time}/100\text{msec})$. These readings must be no greater than the limits specified in 15.209(a).

5.2.5.1.3 Results

Preliminary radiated emissions plots with the test item transmitting at 2405MHz, 2440MHz, and 2480MHz are shown on pages 27 through 44. Final radiated emissions data are presented on data pages 45 through 50. As can be seen from the data, all emissions measured from the test item were within the specification limits. The emissions level closest to the limit (worst case) occurred at 4960MHz. The emissions level at this frequency was 4.1dB within the limit. See data pages 45 through 50 for details. Photographs of the test configuration which yielded the highest, or worst case, radiated emission levels are shown on Figure 3 and Figure 4.

5.2.6 Band Edge Compliance

5.2.6.1 Requirements

Per section 15.247(d), the emissions at the band-edges must be at least 20dB below the highest level measured within the band but attenuation below the general limits listed in 15.209(a) is not required.

In addition, the radiated emissions which fall in the restricted band beginning at 2483.5 MHz must meet the general limits of 15.209(a).

5.2.6.2 Procedures

5.2.6.2.1 Low Band Edge

- 1) The test item was setup inside the test chamber on a non-conductive stand.
- 2) A broadband measuring antenna was placed at a test distance of 3 meters from the test item.
- 3) The test item was set to transmit continuously at the channel closest to the low band-edge.
- 4) The test item was maximized for worst case emissions at the measuring antenna. The maximum meter reading was recorded.
- 5) To determine the bandedge compliance, the following spectrum analyzer settings were used:
 - a. Center frequency = low band-edge frequency.
 - b. Span = Wide enough to capture the peak level of the emission operating on the channel closest to the band-edge, as well as any modulation products which fall outside of the authorized band of operation.
 - c. Resolution bandwidth (RBW) $\geq 1\%$ of the span.
 - d. The 'Max-Hold' function was engaged. The analyzer was allowed to scan until the envelope of the transmitter bandwidth was defined.
 - e. The marker was set on the peak of the in-band emissions. A display line was placed 20dB down from the peak of the in-band emissions. All emissions which fall outside of the authorized band of operation must be below the 20dB down display line. (All emissions to the left of the center frequency (band-edge) must be below the display line.)
 - f. The analyzer's display was plotted using a 'screen dump' utility.

5.2.6.2.2 High Band Edge

- 1) The test item was set to transmit continuously at the channel closest to the high band-edge.
- 2) A double ridged waveguide was placed 3 meters away from the test item. The antenna was connected to the input of a spectrum analyzer.
- 3) The center frequency of the analyzer was set to the high band edge (2483.5MHz).
- 4) The resolution bandwidth was set to 1MHz.
- 5) To ensure that the maximum or worst case emission level was measured, the following steps were taken:
 - a. The test item was rotated so that all of its sides were exposed to the receiving antenna.
 - b. Since the measuring antenna is linearly polarized, both horizontal and vertical field components were measured.
 - c. The measuring antenna was raised and lowered from 1 to 4 meters for each antenna polarization to maximize the readings.
- 6) The highest measured peak reading was recorded.

- 7) The highest measured average reading was recorded.

5.2.6.3 Results

Pages 51 through 53 show the radiated band-edge compliance results. As can be seen from these plots, the radiated emissions at the low end band edge are within the 20 dB down limits. The radiated emissions at the high end band edge are within the general limits.

5.2.7 Power Spectral Density

5.2.7.1 Requirement

Per section 15.247(d), the peak power spectral density from the intentional radiator shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

5.2.7.2 Procedures

- 1) The test item was placed on the non-conductive stand and set to transmit at a mid channel.
- 2) A broadband measuring antenna was placed near the test item.
- 3) To determine the power spectral density, the following spectrum analyzer settings were used for Channel 1:
 - a. Center frequency = transmit frequency
 - b. Span = 1MHz or wider
 - c. Resolution bandwidth (RBW) greater than the 6dB bandwidth.
 - d. Sweep time = auto
 - e. The peak detector and 'Max-Hold' function was engaged. The analyzer was allowed to scan until the envelope of the transmitter bandwidth was defined.
 - f. Channel 1 of the spectrum analyzer was placed in 'View' mode.
- 4) This reading corresponds to the peak output power measured for the mid channel.
- 5) Turn on the display line and place it at the corresponding +8dBm level. (e.g. if the peak output power is +18dBm then the +8dBm level will be 10dB down from the radiated level and if the peak output power is +6dBm then the +8dBm level will be 2dB above the radiated level.)
- 6) The test item was then placed in the normal operation mode.
- 7) To determine the power spectral density, the following spectrum analyzer settings were used for Channel 2:
 - a. Center frequency = transmit frequency
 - b. Span = 1MHz or wider
 - c. Resolution bandwidth (RBW) = 3kHz
 - d. Sweep time = span divided by RBW = (for example :1MHz/3kHz = 333 seconds)
 - e. The peak detector and 'Max-Hold' function was engaged.
 - f. The display line represents the 8 dBm limit
 - g. The analyzer's display was plotted using a 'screen dump' utility.

5.2.7.3 Results

Pages 54 through 56 show the power spectral density results. As can be seen from this plot, the peak power density is less than 8dBm in a 3kHz band during any time interval of continuous transmission.



6 CONCLUSIONS

It was determined that the Twisthink, LLC Swim Device Rev. 5, Part No. TTF0014-04 digital modulation transmitter, Serial No. 020-9820, did fully meet the conducted and radiated emission requirements of the FCC "Code of Federal Regulations" Title 47, Part 15, Subpart C, Sections 15.207 and 15.247 for Intentional Radiators Operating within the 2400-2483.5 MHz, band, and Industry Canada's RSS-210 for Low-power License-exempt radio communication devices when tested per ANSI C63.4-2003.

7 CERTIFICATION

Elite Electronic Engineering Incorporated certifies that the information contained in this report was obtained under conditions which meet or exceed those specified in the test specifications.

The data presented in this test report pertains to the test item at the test date. Any electrical or mechanical modification made to the test item subsequent to the specified test date will serve to invalidate the data and void this certification.

8 ENDORSEMENT DISCLAIMER

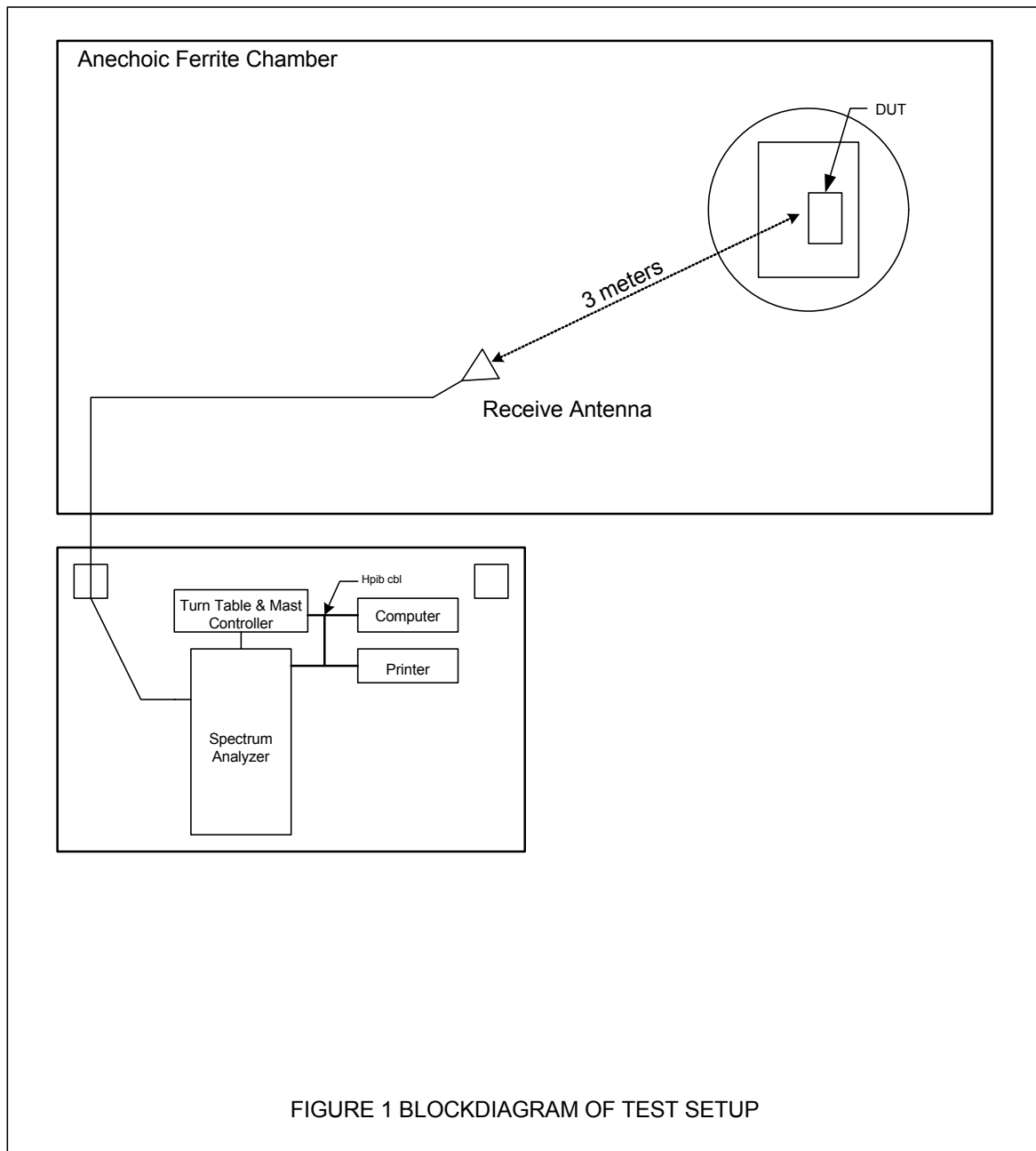
This report must not be used to claim product endorsement by NVLAP or any agency of the US Government.



9 EQUIPMENT LIST

Table 9-1 Equipment List

Eq ID	Equipment Description	Manufacturer	Model No.	Serial No.	Frequency Range	Cal Date	Due Date
APW0	PREAMPLIFIER	PLANAR ELECTRONICS	PE2-30-20G20R6G	PL2926/0646	20GHZ-26.5GHZ	7/28/2009	7/28/2010
APW2	PREAMPLIFIER	PLANAR ELECTRONICS	PE2-35-120-5R0-10	PL2925	1GHZ-20GHZ	7/28/2009	7/28/2010
CDS2	COMPUTER	GATEWAY	MFATXPNT NMZ 500L	0028483108	1.8GHZ	N/A	
CDW0	DESKTOP COMPUTER	COMPAQ		PRESARIO	2.5GHZ	N/A	
GRE0	SIGNAL GENERATOR	AGILENT TECHNOLOGIES	E4438C	MY42083127	250KHZ-6GHZ	2/16/2010	2/16/2011
NHG0	STANDARD GAIN HORN ANTENNA	NARDA	638	---	18-26.5GHZ	NOTE 1	
NTA1	BILOG ANTENNA	CHASE EMC LTD.	BILOG CBL6112	2054	0.03-2GHZ	9/10/2009	9/10/2010
NWI0	RIDGED WAVE GUIDE	AEL	H1498	153	2-18GHZ	12/5/2009	12/5/2010
NWI1	RIDGED WAVE GUIDE	AEL	H1498	154	2-18GHZ	12/5/2009	12/5/2010
RBA1	EMI TEST RECEIVER	ROHDE & SCHWARZ	ESIB26	100146	20HZ-26.5GHZ	9/18/2009	9/18/2010
RBB0	EMI TEST RECEIVER 20HZ TO 40 GHZ.	ROHDE & SCHWARZ	ESIB40	100250	20 HZ TO 40GHZ	3/16/2010	3/16/2011
SES1	24VDC POWER SUPPLY	P TRANS	FS-32024-1M	002	18-27VDC	NOTE 1	
T1N6	10DB 20W ATTENUATOR	NARDA	766-10	---	DC-4GHZ	8/24/2009	8/24/2010
T2D2	20DB, 25W ATTENUATOR	WEINSCHEL	46-20-43	AV5815	DC-18GHZ	11/17/2009	11/17/2010
T2S7	20DB 25W ATTENUATOR	WEINSCHEL	46-20-34	BU8139	DC-18GHZ	3/3/2010	3/3/2011
T2S8	20DB 25W ATTENUATOR	WEINSCHEL	46-20-34	BV3541	DC-18GHZ	1/5/2010	1/5/2011
XOB1	ADAPTER	HEWLETT PACKARD	K281C	10422	18-26.5GHZ	NOTE 1	
XPR0	HIGH PASS FILTER	K&L MICROWAVE	11SH10-4800/X20000	001	4.8-20GHZ	7/27/2009	7/27/2010



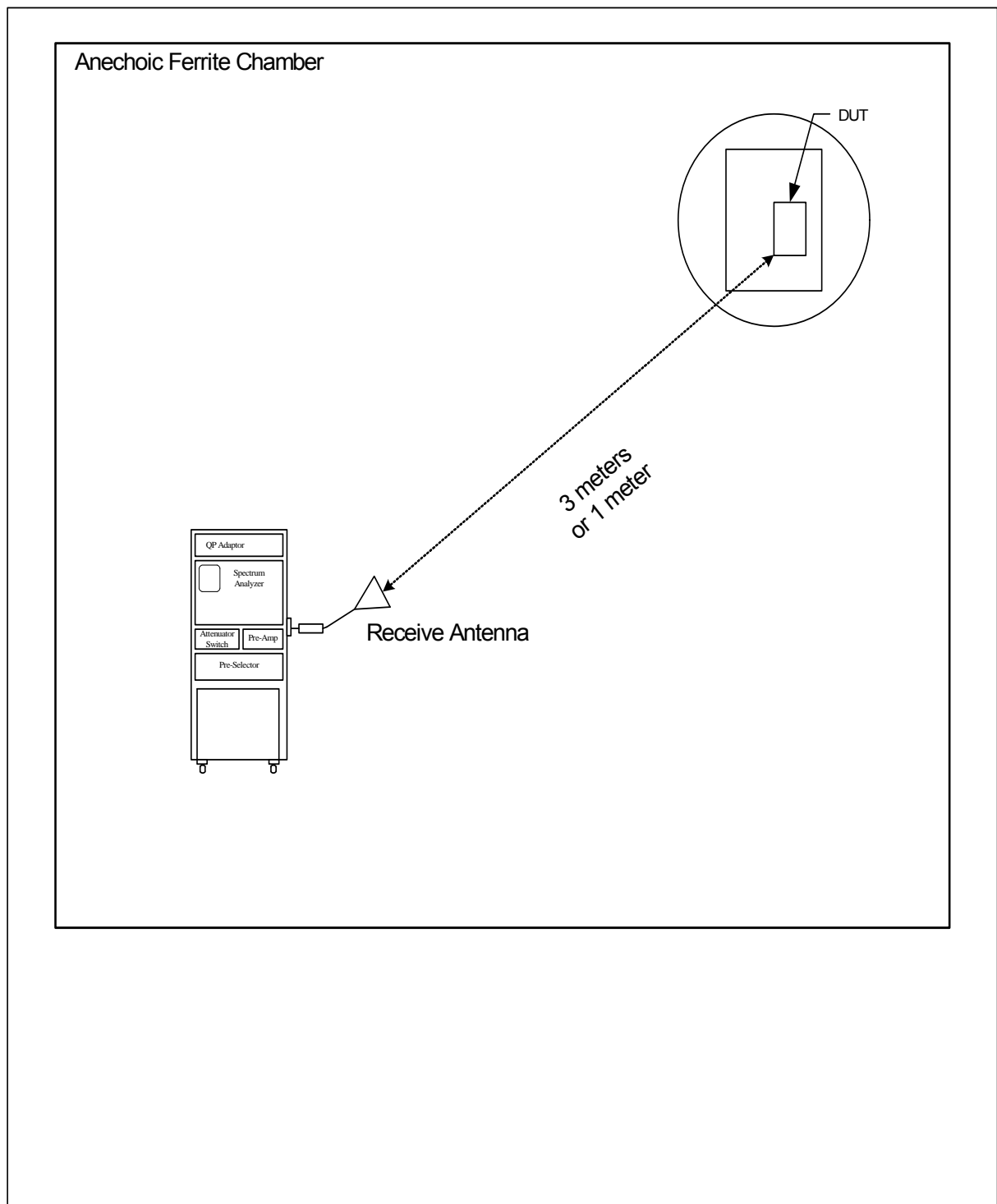
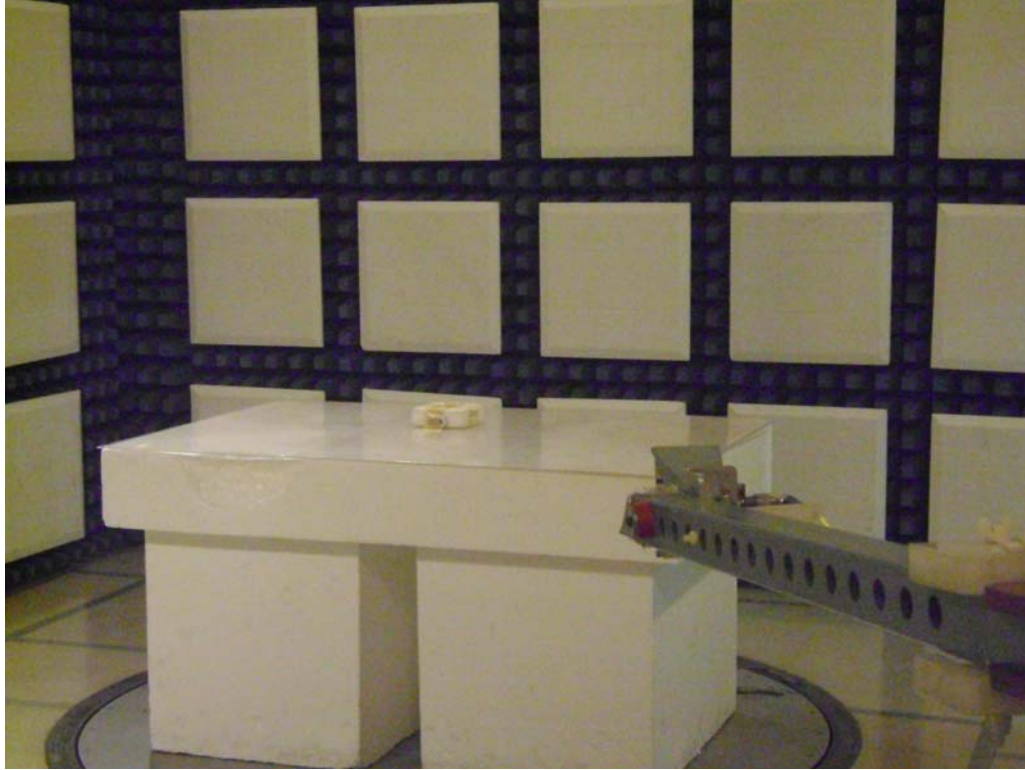


Figure 2: BLOCK DIAGRAM OF TEST SETUP FOR RADIATED EMISSIONS ABOVE 18GHZ

Figure 3



Test Setup for Radiated Emissions – 2GHz to 18GHz



Test Setup for Radiated Emissions – 2GHz to 18GHz