



TEST REPORT

Test Report No. : UL-RPT-RP13591277-716A

Customer : Buddi Limited

Model No. / HVIN : 3430412

PMN : Smart Tag 4

FCC ID : ZDLST5

ISED Certification No. : 20371-ST5

Technology : SRD

Test Standard(s) : FCC Parts 15.209(a) & 15.249
Innovation, Science and Economic Development Canada
RSS-210 Issue 10 December 2019
RSS-Gen Issue 5 February 2021

Test Laboratory : UL International (UK) Ltd, Basingstoke, Hampshire, RG24 8AH,
United Kingdom

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3. The sample tested is in compliance with the above standard(s).
4. The test results in this report are traceable to the national or international standards.
5. Version 2.0 supersedes all previous versions.

Date of Issue: 21 April 2021

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Report Revision History

Version Number	Issue Date	Revision Details	Revised By
1.0	20/04/2021	Initial Version	Ben Mercer
2.0	21/04/2021	Implemented TCB/FCB requested amendments	Ben Mercer

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1. Attestation of Test Results

1.1. Description of EUT

The equipment under test was an Electronic Monitoring (EM) device which communicates to a server-based monitoring platform providing data such as: event time, GPS location, geo-fence data, position type, speed of motion, battery level, signal strength, strap on/off, alerts. It contains a 2G and 3G cellular module (FCC ID: ZDL3430005ST4, IC: 20371-3430005ST3G), a 2.4 GHz WLAN transceiver and a 915 MHz ISM transceiver.

1.2. General Information

Specification Reference:	47CFR15.249
Specification Title:	Code of Federal Regulations Volume 47 (Telecommunications): Part 15 Subpart C (Intentional Radiators) - Section 15.249
Specification Reference:	47CFR15.209
Specification Title:	Code of Federal Regulations Volume 47 (Telecommunications): Part 15 Subpart C (Intentional Radiators) – Section 15.209
Specification Reference:	RSS-Gen Issue 5 February 2021
Specification Title:	General Requirements for Compliance of Radio Apparatus
Specification Reference:	RSS-249 Issue 10 December 2019
Specification Title:	Licence-Exempt Radio Apparatus: Category I Equipment
FCC Site Registration:	621311
ISED Site Registration:	3245B
FCC Lab. Designation No.:	UK2011
ISED CABID:	UK0001
Location of Testing:	Unit 3 Horizon, Wade Road, Kingsland Business Park, Basingstoke, Hampshire, RG24 8AH, United Kingdom
Test Dates:	13 December 2021 to 20 April 2021

1.3. Summary of Test Results

FCC Reference (47CFR)	ISED Canada Reference	Measurement	Result
Part 15.249(a)(e)	RSS-Gen 6.12 / RSS-210 A2.9(a)	Transmitter Fundamental Field Strength	
N/A	RSS-Gen 6.7	Transmitter 99% Occupied Bandwidth	
Part 2.1049	N/A	Transmitter 26 dB Bandwidth	
Part 15.249(d)(e) / 15.209(a)	RSS-Gen 6.13 / RSS-210 A2.9(a)(b)	Transmitter Radiated Emissions	
Part 15.249(d) / 15.209(a)	RSS-Gen 6.13 / RSS-210 A2.9(a)(b)	Transmitter Band Edge Radiated Emissions	
Key to Results  = Complied  = Did not comply			

1.4. Deviations from the Test Specification

For the measurements contained within this test report, there were no deviations from, additions to, or exclusions from the test specification identified above.

2. Summary of Testing

2.1. Facilities and Accreditation

The test site and measurement facilities used to collect data are located at Unit 3 Horizon, Wade Road, Kingsland Business Park, Basingstoke, Hampshire, RG24 8AH, United Kingdom. The following table identifies which facilities were utilised for radiated emission measurements documented in this report. Specific facilities are also identified in the test results sections.

Site 1	X
Site 2	-
Site 17	X

UL International (UK) Ltd is accredited by the United Kingdom Accreditation Service (UKAS). UKAS is one of the signatories to the International Laboratory Accreditation Co-operation (ILAC) Arrangement for the mutual recognition of test reports. The tests reported herein have been performed in accordance with its terms of accreditation.

2.2. Methods and Procedures

Reference:	ANSI C63.10-2013
Title:	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

2.3. Calibration and Uncertainty

Measuring Instrument Calibration

In accordance with UKAS requirements all the measurement equipment is on a calibration schedule. All equipment was within the calibration period on the date of testing.

Measurement Uncertainty & Decision Rule

Overview

No measurement or test can ever be perfect and the imperfections give rise to error of measurement in the results. Consequently the result of a measurement is only an approximation to the value of the measurand (the specific quantity subject to measurement) and is only complete when accompanied by a statement of the uncertainty of the approximation.

The expression of uncertainty of a measurement result allows realistic comparison of results with reference values and limits given in specifications and standards.

Decision Rule

The decision rule applied is based upon the accuracy method criteria. The measurement uncertainty is met and the result is considered in conformance with the requirement criteria if the observed value is within the prescribed limit.

Measurement Uncertainty

The reported expanded uncertainties below are based on a standard uncertainty multiplied by an appropriate coverage factor such that a confidence level of approximately 95% is maintained. For the purposes of this document “approximately” is interpreted as meaning “effectively” or “for most practical purposes”.

Measurement Type	Range	Confidence Level (%)	Calculated Uncertainty
Fundamental Field Strength	902 MHz to 928 MHz	95%	±3.30 dB
99% Emission Bandwidth	902 MHz to 928 MHz	95%	±3.92 %
26 dB Bandwidth	902 MHz to 928 MHz	95%	±4.59 %
Radiated Spurious Emissions	9 kHz to 30 MHz	95%	±5.32 dB
Radiated Spurious Emissions	30 MHz to 1 GHz	95%	±3.30 dB
Radiated Spurious Emissions	1 GHz to 9.3 GHz	95%	±2.94 dB

The methods used to calculate the above uncertainties are in line with those recommended within the various measurement specifications. Where measurement specifications do not include guidelines for the evaluation of measurement uncertainty the published guidance of the appropriate accreditation body is followed.

2.4. Test and Measurement Equipment

Test Equipment Used for Transmitter Fundamental Field Strength, Transmitter 26 dB Bandwidth, 99% Emission Bandwidth & Transmitter Band Edge Radiated Emissions

Asset No.	Instrument	Manufacturer	Type No.	Serial No.	Date Calibration Due	Cal. Interval (Months)
M2003	Thermohygrometer	Testo	608-H1	45046641	10 Dec 2021	12
K0017	3m RSE Chamber	Rainford	N/A	N/A	21 Oct 2021	12
M1995	Test Receiver	Rohde & Schwarz	ESU40	100428	07 Dec 2021	12
A2951	Pre Amplifier	Com-Power	PAM-103	441141	25 Jan 2022	12
A490	Antenna	Chase	CBL6111A	1590	05 Jun 2021	12
A2916	Attenuator	AtlanTecRF	AN18W5-10	832827#1	01 Feb 2022	12
A2943	Attenuator	AtlanTecRF	AN18W5-06	208147#2	01 Feb 2022	12

Test Equipment Used for Transmitter Radiated Emissions

Asset No.	Instrument	Manufacturer	Type No.	Serial No.	Date Calibration Due	Cal. Interval (Months)
M2003	Thermohygrometer	Testo	608-H1	45046641	10 Dec 2021	12
K0017	3m RSE Chamber	Rainford	N/A	N/A	21 Oct 2021	12
M1995	Test Receiver	Rohde & Schwarz	ESU40	100428	07 Dec 2021	12
A2951	Pre Amplifier	Com-Power	PAM-103	441141	25 Jan 2022	12
A2863	Pre Amplifier	Agilent	8449B	3008A02100	21 Oct 2021	12
A3142	Pre Amplifier	Schwarzbeck	BBV 9718B	00020	21 Oct 2021	12
A490	Antenna	Teseq	CBL6111D	50859	05 Jun 2021	12
A2889	Antenna	Schwarzbeck	BBHA 9120 B	BBHA 9120B653	23 Oct 2021	12
A2890	Antenna	Schwarzbeck	HWRD 750	014	26 Oct 2021	12
A2916	Attenuator	AtlanTecRF	AN18W5-10	832827#1	01 Feb 2022	12
A2914	High Pass Filter	AtlanTecRF	AFH-03000	2155	01 Feb 2022	12
A2947	High Pass Filter	AtlanTecRF	AFH-07000	1601900001	01 Feb 2022	12
M2040	Thermohygrometer	Testo	608-H1	45124934	10 Dec 2021	12
K0001	3m RSE Chamber	Rainford EMC	N/A	N/A	14 Oct 2021	12
M2044	Test Receiver	Rohde & Schwarz	ESU26	100122	03 Sep 2021	12
A3154	Pre Amplifier	Com Power	PAM-103	18020012	29 Sep 2021	12
A3198	Magnetic Loop Antenna	ETS-Lindgren	6502	00221887	01 Apr 2021	12

3. Equipment Under Test (EUT)

3.1. Identification of Equipment Under Test (EUT)

Brand Name:	Buddi Ltd
Model Number / HVIN:	3430412
PMN:	Smart Tag 4
Test Sample Serial Number:	STS00091 (<i>Radiated sample #1</i>)
Hardware Version:	V11.10
Software Version:	1.40.8
FCC ID:	ZDLST5
ISED Certification Number:	IC 20371-ST5

Brand Name:	Buddi Ltd
Model Number / HVIN:	3430412
PMN:	Smart Tag 4
Test Sample Serial Number:	STS00098 (<i>Radiated sample #2</i>)
Hardware Version:	V11.10
Software Version:	1.40.8
FCC ID:	ZDLST5
ISED Certification Number:	IC 20371-ST5

3.2. Modifications Incorporated in the EUT

No modifications were applied to the EUT during testing.

3.3. Additional Information Related to Testing

Technology Tested:	Short Range Device		
Type of Unit:	Transceiver		
Modulation Type:	GFSK		
Data Rate:	38.4 Kbit/s		
Power Supply Requirement(s):	Nominal	3.7 VDC	
Channel Spacing:	20 MHz		
Transmit Frequency Range:	914.5 MHz to 921.0 MHz		
Transmit Channels Tested:	Channel ID	Channel Number	Channel Frequency (MHz)
	Bottom	0	914.5
	Middle	6	917.5
	Top	13	921.0

3.4. Description of Available Antenna

The WLAN radio module contains a integral antenna, with the following maximum gain:

Frequency Range (MHz)	Antenna Gain (dBi)
914.5 to 921.0	-1.5

3.5. Description of Test Setup

Support Equipment

The following support equipment was used to exercise the EUT during testing:

Brand Name:	Smart Tag Strap
Description:	Strap which fits around the subject's ankle and then clicks in either end to the Smart Tag device
Model Name or Number:	Smart Tag Strap
Serial Number:	3470000-6

Brand Name:	Smart Tag Strap
Description:	Switching Power Adaptor
Model Name or Number:	DSA-15P-12
Serial Number:	T4641RW

Operating Modes

The EUT was tested in the following operating mode(s):

- Continuously transmitting with a modulated carrier at maximum power on the bottom, middle and top channels as required.

Configuration and Peripherals

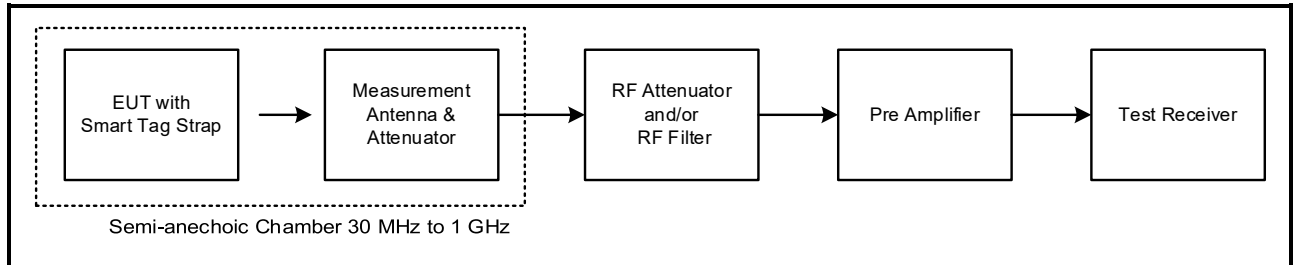
The EUT was tested in the following configuration(s):

- The customer had pre-loaded test software/firmware to the EUT prior to testing. Test mode was enabled following the instructions in 'SmartTAG v11.x 3G+WIFI - FCC ISM Radio Certification Test Guide.pdf', Issue Date: 18 January 2021. A modified Switching Power Adaptor was provided by the customer for test mode purposes only. This allowed selection of test mode parameters via a button in accordance with the provided instructions.
- Transmitter radiated spurious emissions tests were performed with the ankle strap fitted to the EUT and powered from the internal battery.
- All radiated tests were performed with the EUT placed in the worst case orientation/position for the applicable test.

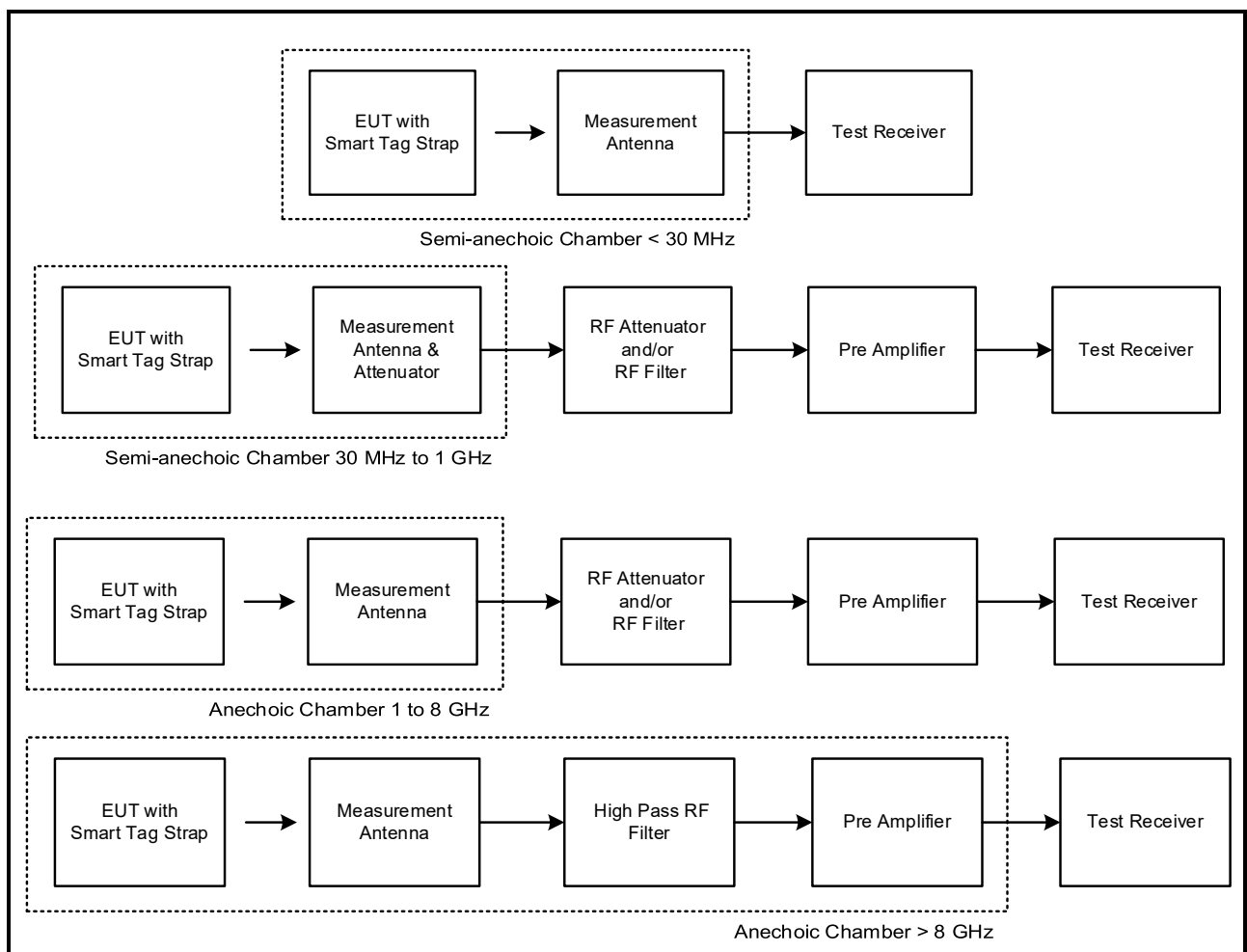
Test Setup Diagrams

Radiated Tests:

Test Setup for Transmitter Fundamental Field Strength, Transmitter 26 dB Bandwidth, 99% Emission Bandwidth & Transmitter Band Edge Radiated Emissions



Test Setup for Transmitter Radiated Emissions



4. Radiated Test Results

4.1. Transmitter Fundamental Field Strength

Test Summary:

Test Engineer:	John Ferdinand	Test Date:	27 January 2021
Test Sample Serial Number:	STS00098		

FCC Reference:	Part 15.249(a)(e)
ISED Canada Reference:	RSS-Gen 6.12 / RSS-210 B.10 a.
Test Method Used:	ANSI C63.10 Section 6.5

Environmental Conditions:

Temperature (°C):	24
Relative Humidity (%):	32

Note(s):

1. The final measured value in the tables below incorporates the calibrated antenna factor and cable loss.
2. Measurements were performed in a semi-anechoic chamber (Asset Number K0017) at a distance of 3 metres. The EUT was placed at a height of 80 cm above the reference ground plane in the centre of the chamber turntable. Maximum emission levels were determined by height searching the measurement antenna over the range 1 metre to 4 metres.
3. Pre-scans were performed and markers placed on the highest measured levels. The test receiver resolution bandwidth was set to 120 kHz and video bandwidth 500 kHz. A peak detector was used, sweep time was set to auto and trace mode was Max Hold.
4. Final measurements were performed on the marker frequencies and results entered into the table below. The test receiver resolution bandwidth was set to 120 kHz, using a CISPR quasi-peak detector.

Results: Bottom Channel / Quasi-Peak

Frequency (MHz)	Antenna Polarity	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Result
914.5	Horizontal	90.4	94.0	3.6	Complied

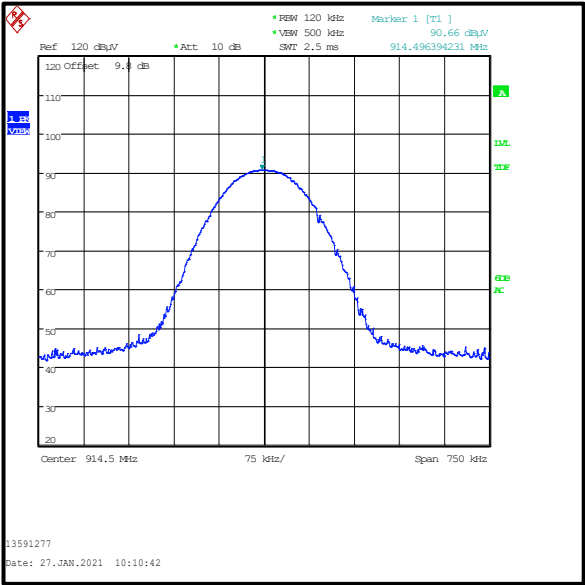
Results: Middle Channel / Quasi-Peak

Frequency (MHz)	Antenna Polarity	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Result
917.5	Horizontal	90.1	94.0	3.9	Complied

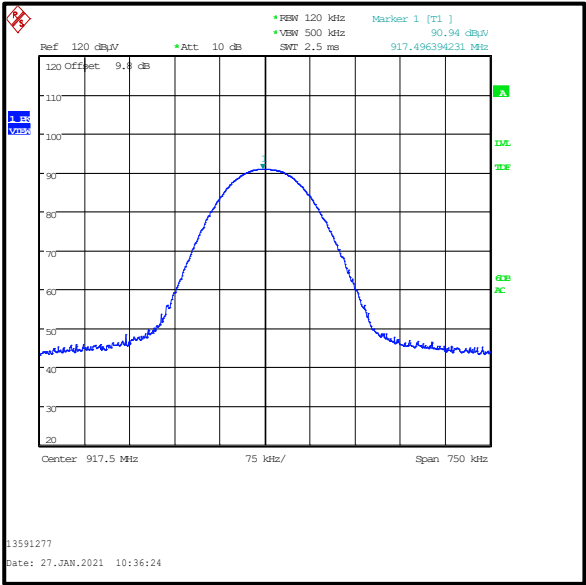
Results: Top Channel / Quasi-Peak

Frequency (MHz)	Antenna Polarity	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Result
921.0	Horizontal	91.3	94.0	2.7	Complied

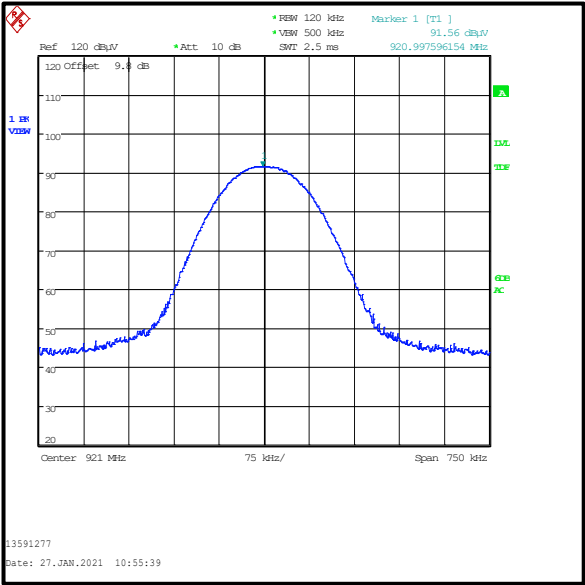
Transmitter Fundamental Field Strength (continued)



Bottom Channel



Middle Channel



Top Channel

4.2. Transmitter Occupied Bandwidth

Test Summary:

Test Engineer:	Jose Bayona	Test Date:	20 April 2021
Test Sample Serial Number:	STS00098		

Industry Canada Reference:	RSS-Gen 6.7
Test Method Used:	RSS-Gen 6.7 and notes below

Environmental Conditions:

Temperature (°C):	24
Relative Humidity (%):	30

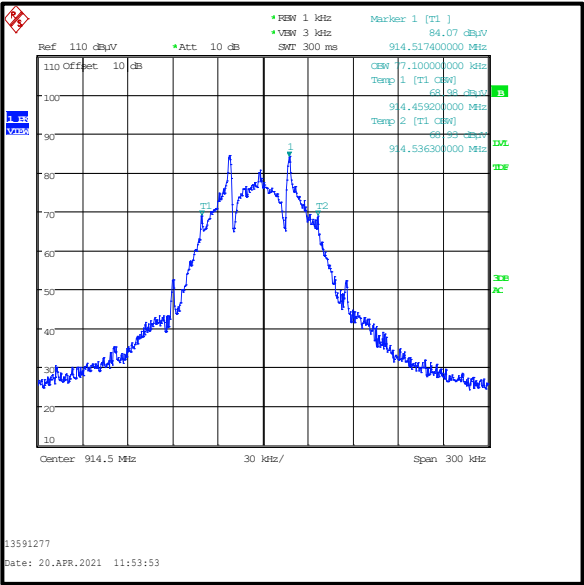
Note(s):

1. Occupied bandwidth (99% bandwidth) was measured using a spectrum analyser occupied bandwidth function. The resolution bandwidth was set to approximately 1 % of the occupied bandwidth and the video bandwidth set to 3 times the resolution bandwidth.
2. The spectrum analyser resolution bandwidth was set to 1 kHz and video bandwidth 3 kHz. A peak detector was used, sweep time was set to auto and the trace mode was Max Hold. The span was set to 300 kHz. The spectrum analyser function set the measurements to be made at 99% of the emission bandwidth. The results are given in the table below.

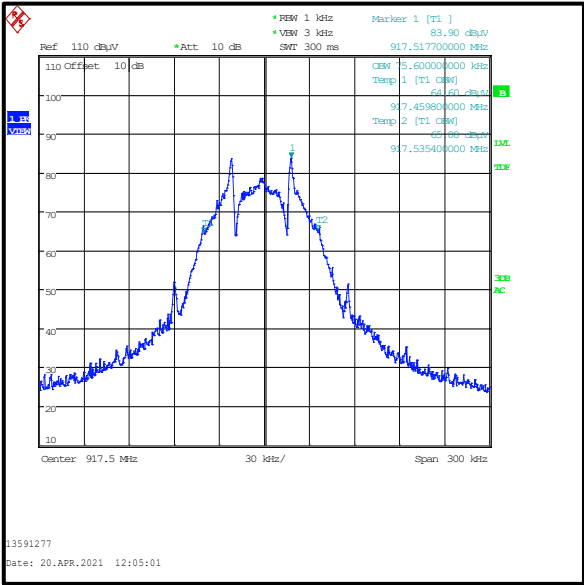
Results:

Channel	Occupied Bandwidth (kHz)
Bottom	77.100
Middle	75.600
Top	76.500

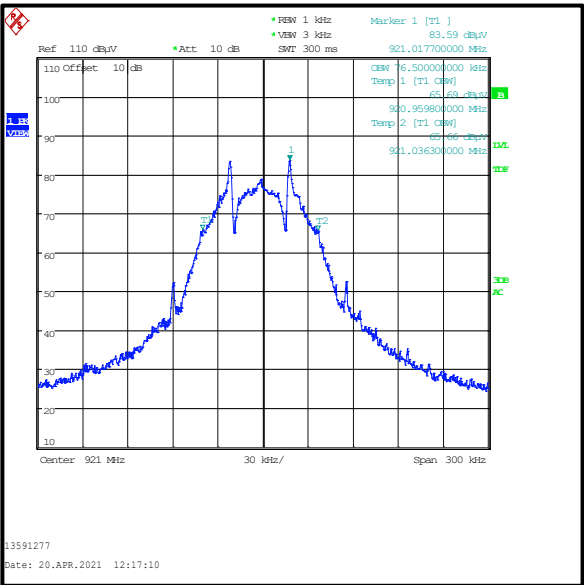
Transmitter Occupied Bandwidth (continued)



Bottom Channel



Middle Channel



Top Channel

4.3. Transmitter 20 dB Bandwidth**Test Summary:**

Test Engineer:	Jose Bayona	Test Date:	20 April 2021
Test Sample Serial Number:	STS00098		

FCC Reference:	Part 2.1049
Test Method Used:	ANSI C63.10 Section 6.9.2

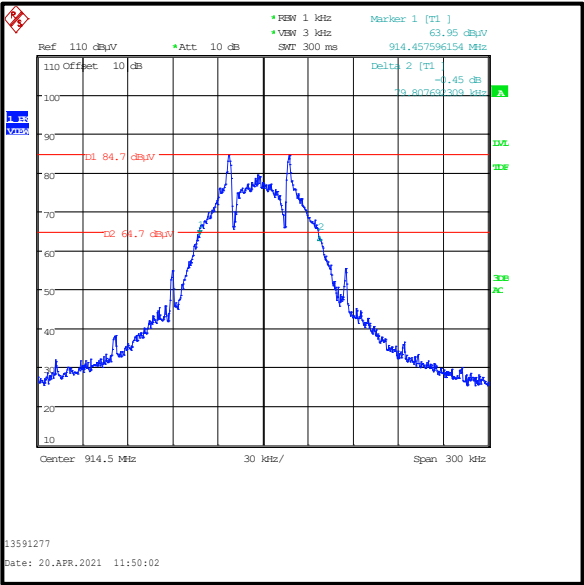
Environmental Conditions:

Temperature (°C):	24
Relative Humidity (%):	30

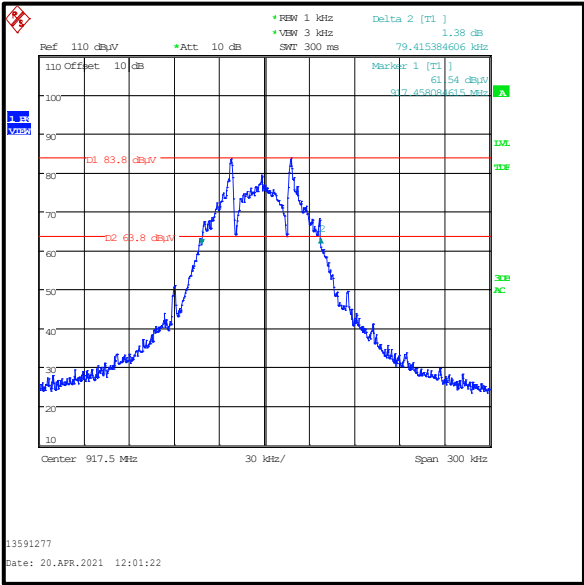
Results:

Channel	20dB Bandwidth (kHz)
Bottom	79.808
Middle	79.415
Top	78.842

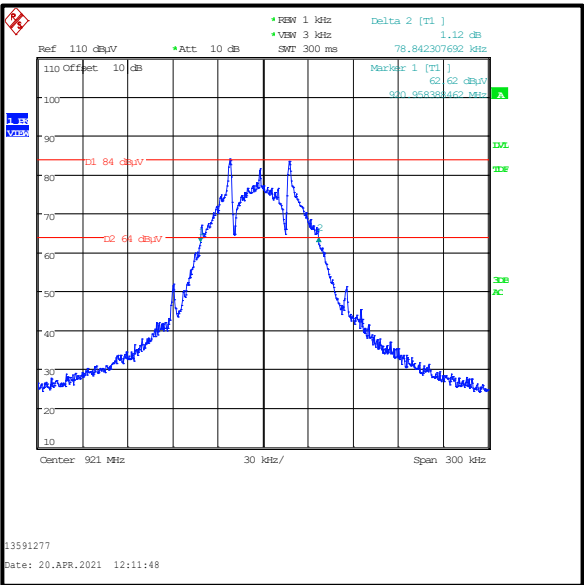
Transmitter 20 dB Bandwidth (continued)



Bottom Channel



Middle Channel



Top Channel

4.4. Transmitter Radiated Emissions <1 GHz

Test Summary:

Test Engineers:	John Ferdinand & Mohamed Toubella	Test Dates:	13 December 2020 & 11 February 2021
Test Sample Serial Number:	STS00091 & STS00098		

FCC Reference:	Parts 15.249(d) & 15.209(a)
ISED Canada Reference:	RSS-Gen 6.13 / RSS-210 B.10 b.
Test Method Used:	ANSI C63.10 Sections 6.3 and 6.5
Frequency Range	9 kHz to 1000 MHz

Environmental Conditions:

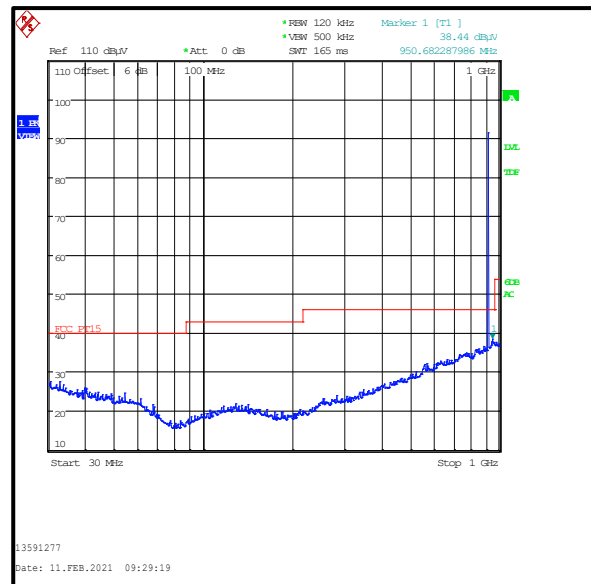
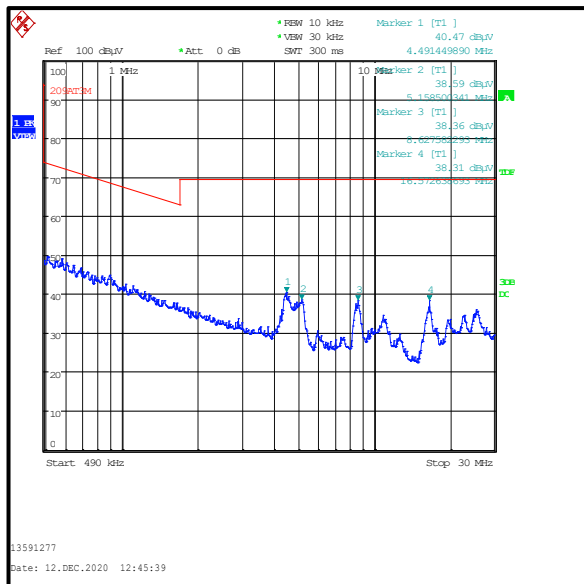
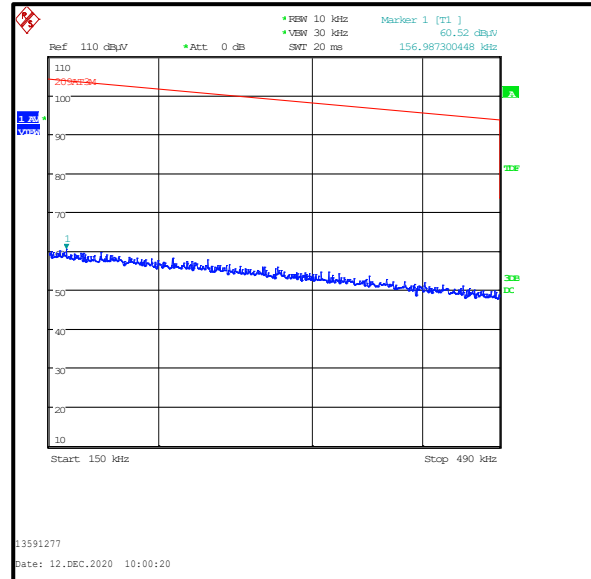
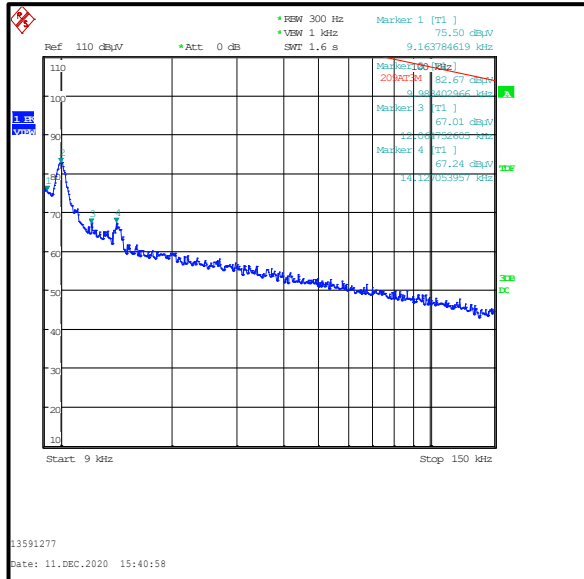
Temperature (°C):	22 to 24
Relative Humidity (%):	36 to 39

Note(s):

1. The final measured value, for the given emission, in the table below incorporates the calibrated antenna factor and cable loss.
2. The preliminary scans showed similar emission levels below 1 GHz, for each channel of operation. Therefore final radiated emissions measurements were performed with the EUT set to the middle channel only.
3. All emissions shown on the pre-scans were investigated and found to be ambient, or > 20 dB below the appropriate limit or below the noise floor of the measurement system. Therefore the highest peak noise floor reading of the measuring receiver was recorded in the table below.
4. The EUT fundamental is shown on the 30 MHz to 1 GHz plot.
5. Pre-scan were performed against Part 15.209 general radiated emissions limits.
6. Measurements below 30 MHz were performed in a semi-anechoic chamber (Asset Number K0001) at 3 metres. The EUT was placed at a height of 80 cm above the reference ground plane in the centre of the chamber turntable. The limit was extrapolated to 3 metres in accordance with ANSI C63.10 Section 6.4.4.2. Correlation data between the semi-anechoic chamber and an open-field test site is available upon request.
7. There are ambient emissions between 4 MHz to 30 MHz on the pre-scan plot for 490 kHz to 30 MHz performed in semi-anechoic chamber. A background scan between 490 kHz to 30 MHz is stored on the company IT server and is available for inspection upon request.
8. Measurements between 30 MHz to 1 GHz were performed in a semi-anechoic chamber (Asset Number K0001) at a distance of 3 metres. The EUT was placed at a height of 80 cm above the reference ground plane in the centre of the chamber turntable. Maximum emission levels were determined by height searching the measurement antenna over the range 1 metre to 4 metres.
9. Pre-scans were performed and markers placed on the highest measured levels. The test receiver was configured as follows: During 9 kHz to 150 kHz tests, the resolution bandwidth was set to 300 Hz and video bandwidth 1 kHz. A peak detector was used and trace mode was Max Hold. For 150 kHz to 490 kHz, the resolution bandwidth was set to 10 kHz and video bandwidth 30 kHz. An average detector was used and trace mode was Max Hold. For 490 kHz to 30 MHz, the resolution bandwidth was set to 10 kHz and video bandwidth 30 kHz. A peak detector was used and trace mode was Max Hold. For 30 MHz to 1 GHz, the resolution bandwidth was set to 120 kHz and video bandwidth 500 kHz. A peak detector was used, sweep time was set to auto and trace mode was Max Hold.

Transmitter Radiated Emissions (continued)**Results: Middle Channel**

Frequency (MHz)	Antenna Polarity	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Result
950.682	Horizontal	38.4	46.0	7.6	Complied



4.5. Transmitter Radiated Emissions >1 GHz

Test Summary:

Test Engineer:	Tom Sleigh	Test Dates:	10 February 2021
Test Sample Serial Number:	STS00098		

FCC Reference:	Parts 15.249(d) & 15.209(a)
ISED Canada Reference:	RSS-Gen 6.13 / RSS-210 B.10 b.
Test Method Used:	ANSI C63.10 Sections 6.3 and 6.6
Frequency Range	1 GHz to 9.3 GHz

Environmental Conditions:

Temperature (°C):	23
Relative Humidity (%):	38

Note(s):

1. The final measured value, for the given emission, in the table below incorporates the calibrated antenna factor and cable loss.
2. All other emissions shown on the pre-scan plot were investigated and found to be ambient or >20 dB below the appropriate limit or below the measurement system noise floor.
3. *In accordance with ANSI C63.10 Section 6.6.4.3, Note 1, if the peak measured value complies with the average limit, it is unnecessary to perform an average measurement.
4. Pre-scans and final measurements above 1 GHz were performed in a fully anechoic chamber (Asset Number K0017) at a distance of 3 metres. The EUT was placed at a height of 1.5 metres above the test chamber floor in the centre of the chamber turntable. During prescans, all measurement antennas were placed at a fixed height of 1.5 metres above the test chamber floor, in line with the EUT. Final measurements above 1 GHz were performed with the EUT placed at a height of 1.5 metres above the reference ground plane in the centre of the chamber turntable. Maximum emission levels were determined by height searching the measurement antenna over the range 1 metre to 4 metres.
5. Pre-scans were performed and a marker placed on the highest measured level of the appropriate plot. The test receiver resolution bandwidth was set to 1 MHz and video bandwidth 3 MHz. The sweep time was set to auto.

Transmitter Radiated Emissions (continued)**Results: Bottom Channel / Peak**

Frequency (MHz)	Antenna Polarity	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Result
2743.648	Horizontal	50.2	54.0*	3.8	Complied
4572.503	Vertical	49.6	54.0*	4.4	Complied

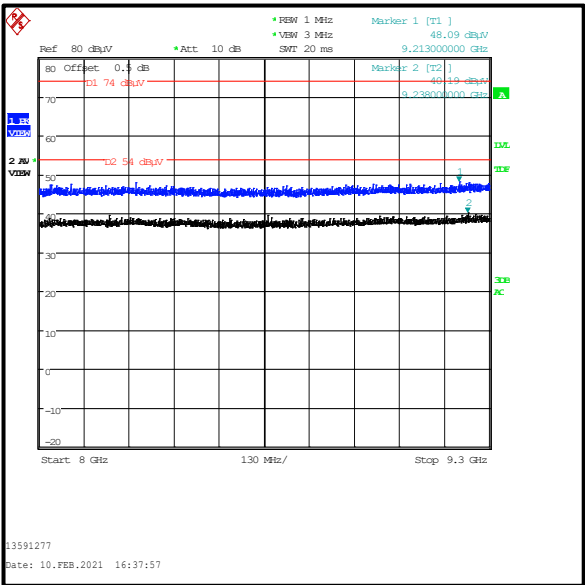
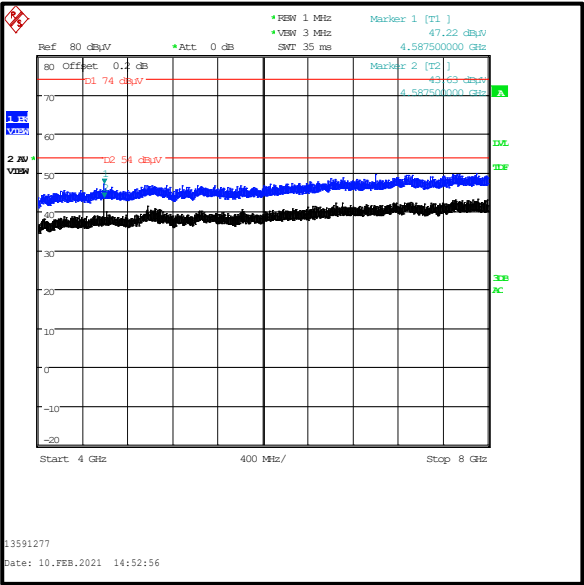
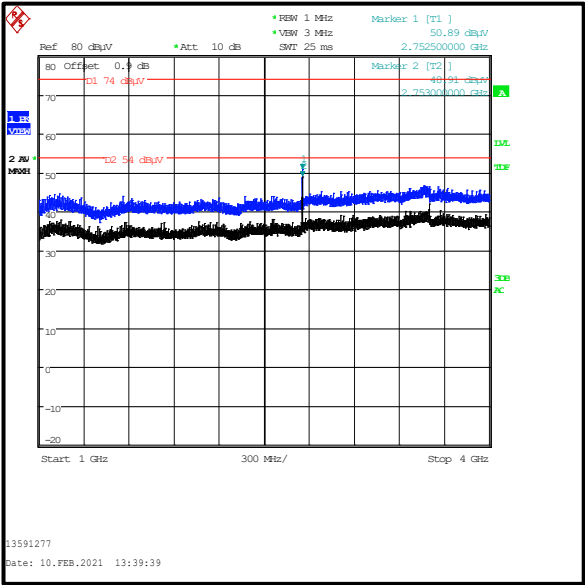
Results: Middle Channel / Peak

Frequency (MHz)	Antenna Polarity	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Result
2752.502	Horizontal	51.1	54.0*	2.9	Complied
4587.594	Vertical	49.5	54.0*	4.5	Complied

Results: Top Channel / Peak

Frequency (MHz)	Antenna Polarity	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Result
2763.003	Horizontal	52.2	54.0*	1.8	Complied
4605.115	Vertical	49.7	54.0*	4.3	Complied

Transmitter Radiated Emissions (continued)



Note: These plots are pre-scans and for indication purposes only. For final measurements, see accompanying tables.

4.6. Transmitter Band Edge Radiated Emissions

Test Summary:

Test Engineer:	Tom Sleigh	Test Dates:	11 February 2021
Test Sample Serial Number:	STS00098		

FCC Reference:	Parts 15.249(d) & 15.209(a)
ISED Canada Reference:	RSS-Gen 6.13 / RSS-210 B.10 b.
Test Method Used:	ANSI C63.10 Sections 6.3, 6.5 and 6.10

Environmental Conditions:

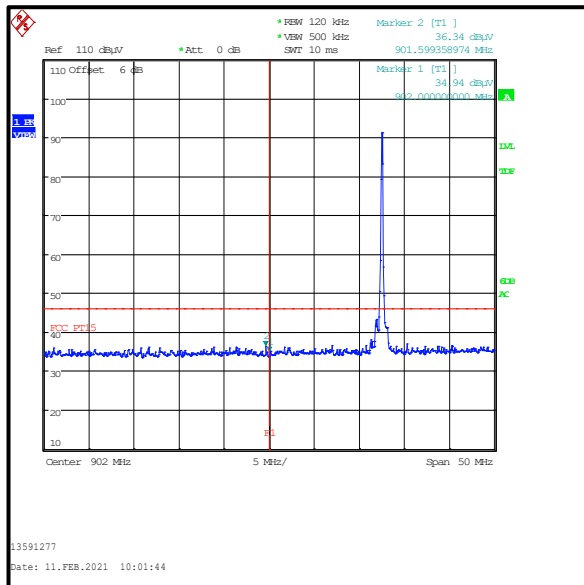
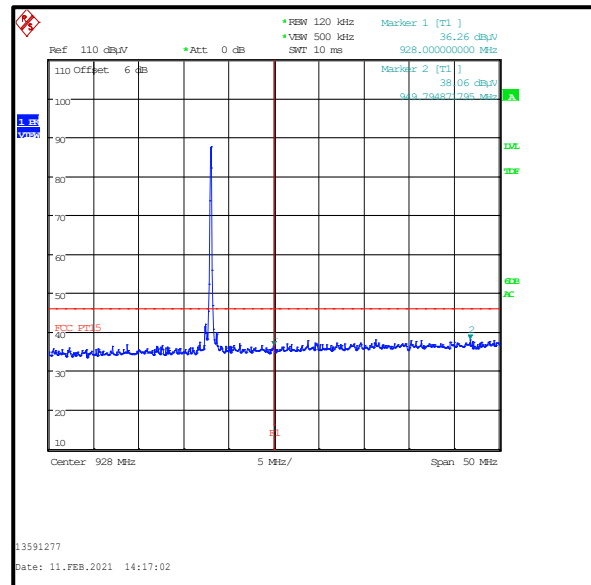
Temperature (°C):	23
Relative Humidity (%):	38

Note(s):

1. The final measured value, for the given emission, in the table below incorporates the calibrated antenna factor and cable loss.
2. In accordance with FCC part 15.249(d), all emissions outside of the specified frequency band shall be attenuated by at least 50 dBc or the general radiated emission limits in 15.209 whichever has less attenuation.
3. As both band edges are adjacent to non-restricted bands, only peak measurements are required. In accordance with ANSI C63.10 Section 6.10.4, was followed: the test receiver resolution bandwidth was set to 120 kHz and video bandwidth 500 kHz. A peak detector was used, sweep time was set to auto and trace mode was Max Hold. The test receiver was left to sweep for a sufficient length of time in order to maximise the carrier level and out-of-band emissions. A marker and corresponding reference level line were placed on the peak of the carrier and an out-of-band limit line was placed below the peak level. Markers were placed on the band edge spot frequencies. Additional markers were placed on the highest emission levels outside the band edges (where a higher level emission was present). Marker frequencies and levels were recorded.

Transmitter Band Edge Radiated Emissions (continued)**Results: Peak**

Frequency (MHz)	Antenna Polarity	Level (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Result
901.599	Vertical	36.3	46.0	9.7	Complied
902	Vertical	34.9	46.0	11.1	Complied
928	Vertical	36.3	46.0	9.7	Complied
949.795	Vertical	38.1	46.0	7.9	Complied

**Lower Band Edge****Upper Band Edge****--- END OF REPORT ---**