

EMI TEST REPORT FCC CERTIFICATION

Applicant:

LG Electronics MobileComm U.S.A., Inc.
1000 Sylvan Avenue, Englewood Cliffs NJ 07632

Date of Receipt: September 27, 2016

Date of Issue: September 30, 2016

Test Report No. HCT-E-1609-F010-1

HCT FRN: 0005866421

FCC ID :

ZNFW280

Rule Part(s) / Standard(s): FCC CFR 47 PART 15 Subpart B Class B
FCC Classification: JBP (Part 15 B – Class B Computing Device Peripheral)
EUT Type: Portable Wrist Device
Model Name: LG-W280
Additional Model Name(s): LGW280, W280, LG-W280A, LGW280A, W280A, LG-W280V, LGW280V, W280V
Date of Test: September 27, 2016 - September 28, 2016

The device bearing the trade name and model specified above, has been shown to comply with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures specified in ANSI C63.4-2014. (See Test Report if any modifications were made for compliance)

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

HCT certifies that no party to application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C 862

Tested By



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Test Engineer
EMC Team
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Reviewed By



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DOCUMENT HISTORY

The revision history for this document is shown in table.

Version	Date	Description
HCT-E-1609-F010	September 29, 2016	Initial Release
HCT-E-1609-F010-1	September 30, 2016	Change the name of the additional model



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ATTACHMENT: TEST SETUP PHOTOGRAPHS



1. GENERAL INFORMATION

1.1 Description of EUT

Equipment Under Test is manufactured by **LG Electronics MobileComm U.S.A., Inc.**
Its basic purpose is used for communications.

FCC ID	ZNFW280
EUT Type	Portable Wrist Device
Model	LG-W280
Additional Model(s)	LGW280, W280, LG-W280A, LGW280A, W280A, LG-W280V, LGW280V, W280V
TX Frequency	824.20 MHz to 848.80 MHz (GSM 850) 1 850.20 MHz to 1 909.80 MHz (GSM 1 900) 826.40 MHz to 846.60 MHz (WCDMA 850) 1 852.4 MHz to 1 907.6 MHz (WCDMA 1 900) 1712.4 MHz to 1752.6 MHz (WCDMA 1 700) 1 850 MHz to 1 910 MHz (LTE B2) 1 710 MHz to 1 755 MHz (LTE B4) 824 MHz to 849 MHz (LTE B5) 777 MHz to 787 MHz (LTE B13)
RX Frequency	869.20 MHz to 893.80 MHz (GSM 850) 1 930.20 MHz to 1 989.80 MHz (GSM 1 900) 871.40 MHz to 891.60 MHz (WCDMA 850) 1 932.4 MHz to 1 987.6 MHz (WCDMA 1 900) 2 112.4 MHz to 2 152.6 MHz (WCDMA 1 700) 1 930 MHz to 1 990 MHz (LTE B2) 2 110 MHz to 2 155 MHz (LTE B4) 869 MHz to 894 MHz (LTE B5) 746 MHz to 756 MHz (LTE B13)

1.2 Related Submittal(s) / Grant(s)

Original submittal only.



1.3 Test Facility

Test site is located at 74, SEOICHEON-RO, 578BEON-GIL, MAJANG-MYEON, ICHEON-SI, GYEONGGI-DO, SOUTH KOREA. Those measurement facilities are constructed in conformance with the requirements of ANSI C63.4-2014.

Measurement Facilities	Registration Number
Radiated Field strength measurement facility (3 m)	90661 (July 07, 2015)
Radiated Field strength measurement facility (10 m)	90661 (July 07, 2015)

1.4 Calibration of Measuring Instrument

The measuring equipment, which was utilized in performing the tests documented herein, has been calibrated in accordance with the manufacturers recommendations for utilizing calibration equipments, which is traceable to recognized national standards.

Especially, all antenna for measurement is calibrated in accordance with the requirements of C63.5 (Version : 2006).



1.5 Tested System Details

All equipment descriptions used in the tested system (including inserted cards) are:

Device Type	Model Name	Manufacturer	FCC ID / DoC	Connected To
EUT	LG-W280	LG	ZNFW280	Wireless PAD
USB cable	EAD63849205	Ningbo Broad	-	Wireless PAD, Notebook PC
Wireless PAD	WCD-H100	LGIT	-	Notebook PC
Notebook PC	ProBook6560b	HP	DoC	Gateway , Wireless PAD, Notebook PC adaptor, RJ45 cable, Serial mouse
Notebook PC adaptor	Series PPP009L-E	LITE-ON TECHNOLOGY	-	Notebook PC
Gateway	TL-WR747N	TP-LINK	-	RJ45 cable, Gateway adaptor
Gateway adaptor	T120150-2H1	TP-LINK	-	Gateway
Serial mouse	Serial 2 button mouse	Radio shack	FSUGMZE3	Notebook PC
RJ45 cable	-	-	-	Notebook PC, Gateway



1.6 Cable Description

Product Name	Port	Power Cord Shielded (Y/N)	I/O Cable Shielded (Y/N)	Length (m)
EUT	-	-	-	-
Wireless PAD	USB type C	Y	Y	(P)1.0
Notebook PC	RJ 45	N/A	N	(D)2.5
	Serial (Mouse)	N/A	Y	(D)1.8
	DC in	N	N/A	(P)1.8
Gateway	DC in	N	N/A	(P)1.8

* The marked “(D)” means the data cable and “(P)” means the power cable.

1.7 Noise Suppression Parts on Cable. (I/O Cable)

Product Name	Port	Ferrite Bead (Y/N)	Location	Metal Hood (Y/N)	Location
EUT	-	-	-	-	Both End
Wireless PAD	USB type C	N	N/A	Y	Both End
Notebook PC	RJ 45	N	N/A	N	N/A
	Serial (Mouse)	N	N/A	Y	Notebook PC End



2. MEASUREMENT UNCERTAINTY

The measurement uncertainties shown below were calculated in accordance with the requirements of ANSI C63.4-2014.

All measurement uncertainty values are shown with a coverage factor of $k = 2$ to indicate a 95 % level of confidence. The measurement data shown herein meets or exceeds the U_{CISPR} measurement uncertainty values specified in CISPR 16-4-2 and, thus, can be compared directly to specified limits to determine compliance.

Parameter	Expanded Uncertainty (dB)
Conducted Emission	$\pm 1.82 \text{ dB } (k = 2)$
Radiated Emissions (30 MHz to 1 GHz)	$\pm 5.06 \text{ dB } (k = 2)$
Radiated Emissions (1 GHz to 6 GHz)	$\pm 5.0 \text{ dB } (k = 2)$
Radiated Emissions (6 GHz to 18 GHz)	$\pm 5.4 \text{ dB } (k = 2)$



3. DESCRIPTION OF TEST

3.1 Measurement of Conducted Emission

The test procedure was in accordance with ANSI C63.4-2014, Clause 7.3

- a. The EUT was placed 0.4 meters from the conducting wall of the shielded room with EUT being connected to the power mains through a line impedance stabilization network (LISN).
 If the EUT is connected to the PC through USB, the AC power-line adapter of the PC is directly connected to a line impedance stabilization network (LISN).
 Other support units were connected to the power mains through another LISN. The two LISNs provide 50 Ohm/ 50uH of coupling impedance for the measuring instrument.
- b. Both conducted lines are measured in Quasi-Peak and Average mode, including the worst-case data points for each tested configuration.
- c. The frequency range from 150 kHz to 30 MHz was searched.

[Conducted Emission Limits]

Frequency (MHz)	Resolution Bandwidth (kHz)	Quasi-Peak (dB(μV))	Average (dB(μV))
0.15 to 0.5	9	66 to 56*	56 to 46*
0.5 to 5	9	56	46
5 to 30	9	60	50

**Decreases with the logarithm of the frequency.*



3.2 Measurement of Radiated Emission

The test procedure was in accordance with ANSI C63.4-2014, Clause 8.3

- a. The EUT was placed on the top of a turn table 0.8 meters above the ground at a semi-anechoic chamber. The table was rotated 360 degrees to determine the position of the highest radiation.
- b. The EUT was set 3 m away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. The antenna height is varied from 1 m to 4 m above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are set to make the measurement.
- d. For each suspected emission, the EUT was arranged to its worst case and then the antenna was tuned to heights from 1 m to 4 m and the turn table was turned from 0 degrees to 360 degrees to find the maximum reading.
- e. The test-receiver system was set to Quasi-Peak detect function and specified bandwidth with maximum hold mode when the test frequency is below 1 GHz.
- f. The test-receiver system was set to Peak and Average detect function and specified bandwidth with maximum hold mode when the test frequency is above 1 GHz.
- g. Place the measurement antenna away from each area of the EUT determined to be a source of emissions at the specified measurement distance, while keeping the measurement antenna aimed at the source of emissions at each frequency of significant emissions, with polarization oriented for maximum response.(1 GHz to 40 GHz)

[Radiated Emission Limits]

Frequency (MHz)	Antenna Distance (m)	Field Strength ($\mu\text{V}/\text{m}$)	Quasi-Peak ($\text{dB}(\mu\text{V})/\text{m}$)
30 to 88	3	100	40.0
88 to 216	3	150	43.5
216 to 960	3	200	46.0
Above 960	3	500	54.0
Frequency (MHz)	Antenna Distance (m)	Peak ($\text{dB}(\mu\text{V})/\text{m}$)	Average ($\text{dB}(\mu\text{V})/\text{m}$)
Above 1 000	3	74	54

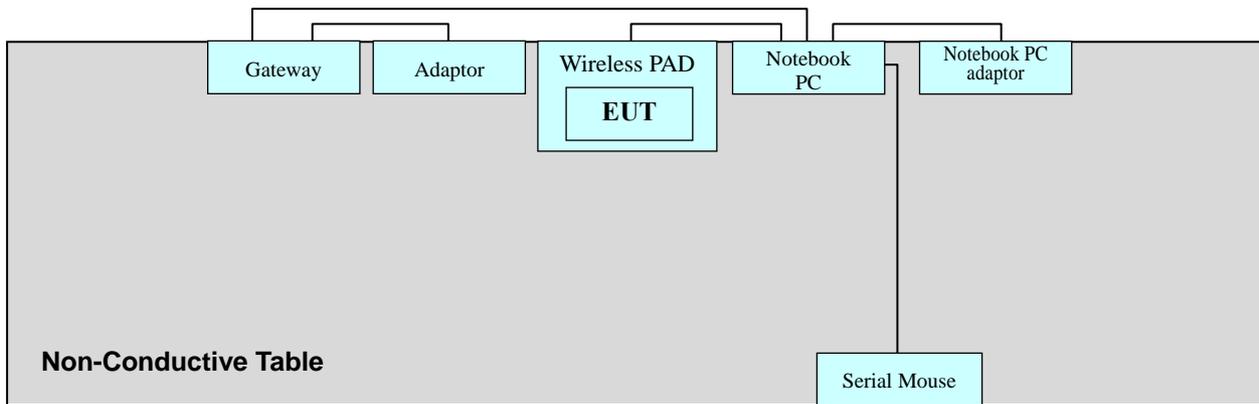


3.2.1 Frequency Range of Radiated Measurements

An unintentional radiator, including a digital device, the spectrum shall be investigated from the lowest radio frequency signal generated or used in the device, without going below the lowest frequency for which a Radiated Emission limit is specified, up to the frequency shown in the following table

Highest frequency generated or used in the device or on which the device operates or tunes (MHz)	Upper frequency of measurement range (MHz)
Below 1.705	30
1.705 to 108	1 000
108 to 500	2 000
500 to 1 000	5 000
Above 1 000	5 th harmonic of the highest frequency or 40 GHz, whichever is lower

3.3 Configuration of Tested System



Power Line: 120 VAC, 60 Hz



4. PRELIMINARY TEST

4.1 Conducted Emission Test

It was tested Charging mode, after connecting all peripheral devices.

Operation Mode: Charging mode

4.2 Radiated Emission Test

It was tested Charging mode, after connecting all peripheral devices.

Operation Mode: Charging mode



5. CONDUCTED AND RADIATED EMISSION TEST SUMMARY

5.1 Conducted Emission Test

The test results of conducted emission at mains ports provide the following information:

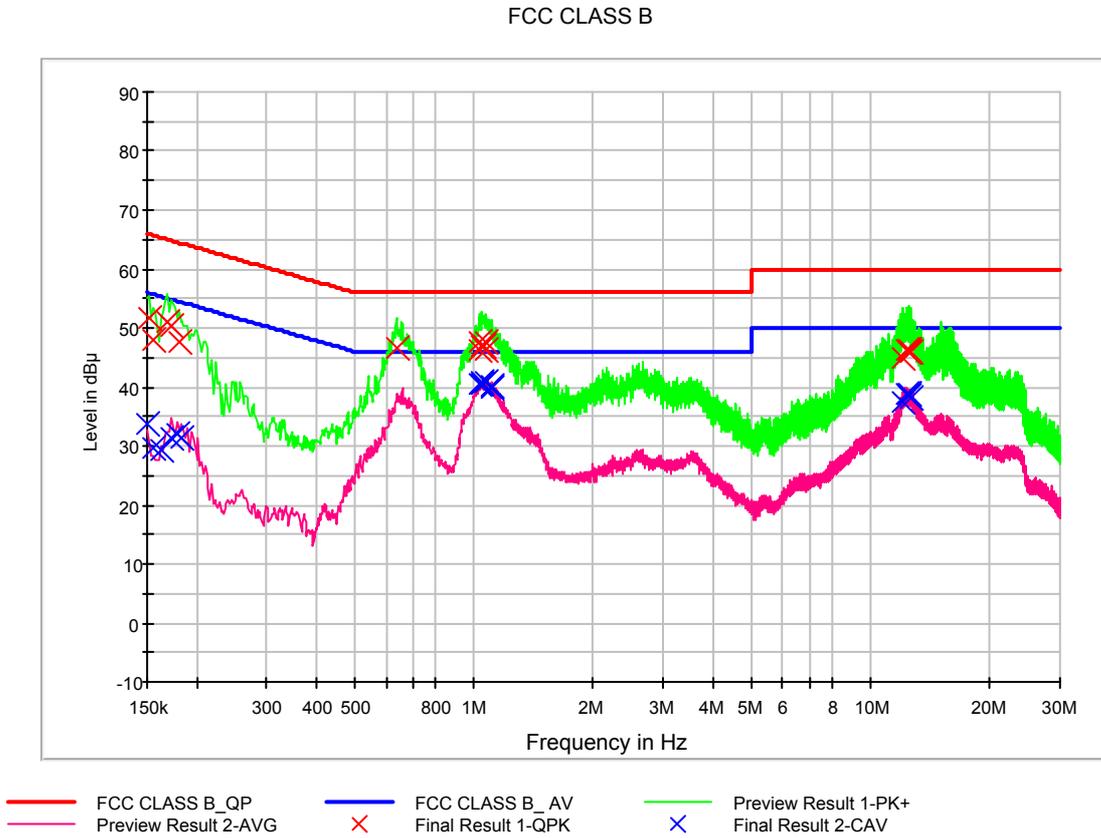
Rule Part / Standard	FCC PART 15 Subpart B Class B
Detector	Quasi-Peak, CISPR-Average
Bandwidth	9 kHz (6 dB)
Operation Mode	Charging mode
Kind of Test Site	Shielded Room
Temperature	24.9 °C
Relative Humidity	47.7 %
Test Date	September 28, 2016

- Calculation Formula:

1. Conductor L1 = Hot, Conductor N = Neutral
2. Corr. = LISN Factor + Cable Loss
3. QuasiPeak or CAverage= Receiver Reading + Corr.
4. Margin = Limit – QuasiPeak or CAverage



Figure 1: Spectral Diagrams, Conducted Emission, AC Main Port, Line (L1)





QuasiPeak Final Result, Line (L1)

Frequency (MHz)	QuasiPeak (dBuV)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dBuV)
0.152000	51.7	9.000	L1	9.7	14.2	65.9
0.156000	48.0	9.000	L1	9.7	17.7	65.7
0.168000	51.1	9.000	L1	9.7	14.0	65.1
0.172000	50.4	9.000	L1	9.7	14.5	64.9
0.180000	47.5	9.000	L1	9.7	17.0	64.5
0.636000	46.6	9.000	L1	9.7	9.4	56.0
1.028000	46.3	9.000	L1	9.8	9.7	56.0
1.032000	47.8	9.000	L1	9.8	8.2	56.0
1.048000	46.9	9.000	L1	9.8	9.1	56.0
1.052000	46.8	9.000	L1	9.8	9.2	56.0
1.072000	46.4	9.000	L1	9.8	9.6	56.0
1.076000	47.7	9.000	L1	9.8	8.3	56.0
11.986000	45.0	9.000	L1	10.1	15.0	60.0
12.274000	46.2	9.000	L1	10.1	13.8	60.0
12.448000	46.3	9.000	L1	10.1	13.7	60.0
12.456000	46.0	9.000	L1	10.1	14.0	60.0
12.468000	46.3	9.000	L1	10.1	13.7	60.0
12.590000	46.0	9.000	L1	10.1	14.0	60.0

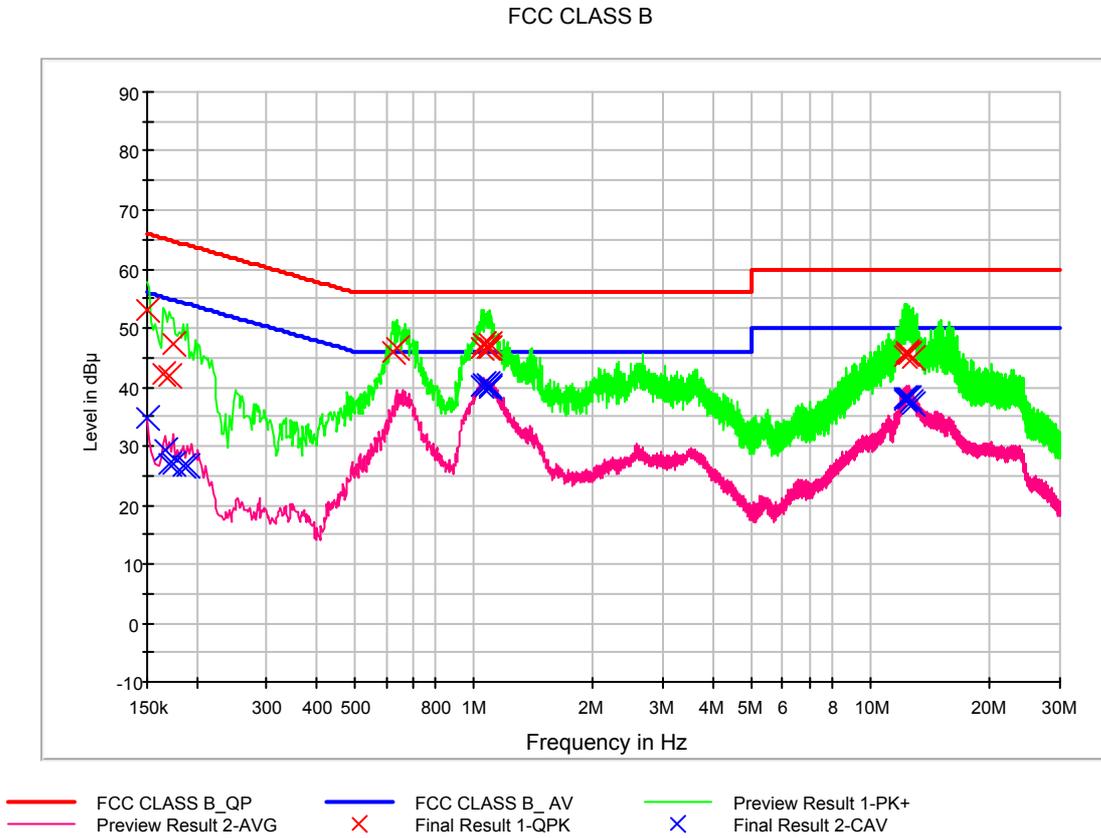


CAverage Final Result, Line (L1)

Frequency (MHz)	CAverage (dBuV)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dBuV)
0.150000	33.7	9.000	L1	9.7	22.3	56.0
0.156000	29.7	9.000	L1	9.7	26.0	55.7
0.162000	29.3	9.000	L1	9.7	26.1	55.4
0.172000	31.2	9.000	L1	9.7	23.7	54.9
0.178000	32.1	9.000	L1	9.7	22.5	54.6
0.182000	31.3	9.000	L1	9.7	23.1	54.4
1.032000	40.5	9.000	L1	9.8	5.5	46.0
1.046000	40.6	9.000	L1	9.8	5.4	46.0
1.050000	40.7	9.000	L1	9.8	5.3	46.0
1.070000	40.9	9.000	L1	9.8	5.1	46.0
1.102000	40.1	9.000	L1	9.8	5.9	46.0
1.112000	39.9	9.000	L1	9.8	6.1	46.0
11.986000	37.6	9.000	L1	10.1	12.4	50.0
12.320000	38.7	9.000	L1	10.1	11.3	50.0
12.448000	38.6	9.000	L1	10.1	11.4	50.0
12.456000	38.7	9.000	L1	10.1	11.3	50.0
12.534000	38.4	9.000	L1	10.1	11.6	50.0
12.590000	38.2	9.000	L1	10.1	11.8	50.0



Figure 2: Spectral Diagrams, Conducted Emission, AC Main Port, Line (N)





QuasiPeak Final Result, Line (N)

Frequency (MHz)	QuasiPeak (dBuV)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dBuV)
0.150000	53.0	9.000	N	9.7	13.0	66.0
0.164000	42.3	9.000	N	9.7	22.9	65.3
0.170000	41.8	9.000	N	9.7	23.1	65.0
0.174000	47.2	9.000	N	9.7	17.6	64.8
0.626000	46.1	9.000	N	9.7	9.9	56.0
0.638000	46.7	9.000	N	9.7	9.3	56.0
1.048000	46.5	9.000	N	9.7	9.5	56.0
1.056000	47.2	9.000	N	9.7	8.8	56.0
1.060000	47.3	9.000	N	9.7	8.7	56.0
1.084000	46.5	9.000	N	9.7	9.5	56.0
1.090000	47.2	9.000	N	9.7	8.8	56.0
1.100000	46.5	9.000	N	9.7	9.5	56.0
12.156000	45.4	9.000	N	10.1	14.6	60.0
12.296000	45.5	9.000	N	10.1	14.5	60.0
12.326000	46.0	9.000	N	10.1	14.0	60.0
12.510000	45.7	9.000	N	10.1	14.3	60.0
12.528000	45.6	9.000	N	10.1	14.4	60.0
12.704000	45.0	9.000	N	10.1	15.0	60.0



CAverage Final Result, Line (N)

Frequency (MHz)	CAverage (dBuV)	Bandwidth (kHz)	Line	Corr. (dB)	Margin (dB)	Limit (dBuV)
0.150000	34.6	9.000	N	9.7	21.4	56.0
0.166000	29.5	9.000	N	9.7	25.7	55.2
0.170000	27.0	9.000	N	9.7	28.0	55.0
0.174000	27.1	9.000	N	9.7	27.7	54.8
0.186000	26.6	9.000	N	9.7	27.6	54.2
0.190000	26.5	9.000	N	9.7	27.5	54.0
1.046000	40.3	9.000	N	9.7	5.7	46.0
1.060000	40.4	9.000	N	9.7	5.6	46.0
1.068000	40.1	9.000	N	9.7	5.9	46.0
1.084000	40.4	9.000	N	9.7	5.6	46.0
1.092000	39.9	9.000	N	9.7	6.1	46.0
1.100000	40.2	9.000	N	9.7	5.8	46.0
12.162000	37.8	9.000	N	10.1	12.2	50.0
12.244000	38.0	9.000	N	10.1	12.0	50.0
12.346000	38.3	9.000	N	10.1	11.7	50.0
12.496000	38.1	9.000	N	10.1	11.9	50.0
12.656000	37.5	9.000	N	10.1	12.5	50.0
12.704000	37.2	9.000	N	10.1	12.8	50.0



5.2 Radiated Emission Test

The test results of radiated emission provide the following information:

-For Measurement Below 1 GHz

Rule Part / Standard	FCC PART 15 Subpart B Class B
Detector	Quasi-Peak
Bandwidth	120 kHz (6 dB)
Operation Mode	Charging mode
Kind of Test Site	3 m semi anechoic chamber
Temperature	23.3 °C
Relative Humidity	57.7 %
Test Date	September 28, 2016

Frequency (MHz)	Quasi Peak (dBuV/m)	Antenna Height (cm)	POL. (H/V)	Azimuth (deg)	Corr. (dB)	Margin (dB)	Limit (dBuV/m)
38.775551	24.7	116.0	V	111.0	22.2	15.3	40.0
54.046653	26.0	100.0	V	90.0	22.8	14.0	40.0
66.573868	28.5	150.0	H	15.0	21.6	11.5	40.0
72.885531	23.7	150.0	H	90.0	20.5	16.3	40.0
240.299880	33.2	135.0	H	4.0	21.7	12.8	46.0
265.570421	32.9	150.0	H	324.0	22.6	13.1	46.0

- Calculation Formula:

1. POL. H = Horizontal, POL. V = Vertical
2. QuasiPeak = Reading (Receiver Reading) + Corr.
3. Corr. (Correction Factor) = Antenna Factor + Cable Loss
4. Margin = Limit - QuasiPeak



-For Measurement Above 1 GHz

Rule Part / Standard	FCC PART 15 Subpart B Class B
Detector	Peak mode: Peak (RBW: 1 MHz, VBW: 3 MHz) CISPR-Average mode: Peak (RBW: 1 MHz, VBW: 10 Hz)
Highest Operating Frequency	1.094 GHz
Upper Frequency of Measurement Range	1 GHz to 6 GHz
Operation Mode	Charging mode
Kind of Test Site	3 m semi anechoic chamber
Temperature	23.1 °C
Relative Humidity	55.5 %
Test Date	September 27, 2016

Frequency (MHz)	Peak (dBµV/m)	Antenna Height (cm)	POL. (H/V)	Azimuth (deg)	Corr. (dB)	Margin (dB)	Limit (dBµV/m)
1333.016032	45.1	308.6	V	346.0	-9.1	28.9	74.0
1399.949900	47.8	218.6	V	13.0	-8.9	26.2	74.0
1992.935872	50.9	99.8	V	209.0	-8.4	23.1	74.0
2590.731463	48.9	362.8	V	197.0	-5.5	25.1	74.0
4197.244488	46.6	299.6	V	299.0	-1.6	27.4	74.0
4899.849699	50.0	249.9	V	230.0	0.7	24.0	74.0

Frequency (MHz)	CAverage (dBµV/m)	Antenna Height (cm)	POL. (H/V)	Azimuth (deg)	Corr. (dB)	Margin (dB)	Limit (dBµV/m)
1333.016032	28.3	308.6	V	346.0	-9.1	25.7	54.0
1399.949900	44.7	218.6	V	13.0	-8.9	9.3	54.0
1992.935872	32.7	99.8	V	209.0	-8.4	21.3	54.0
2590.731463	32.6	362.8	V	197.0	-5.5	21.4	54.0
4197.244488	34.0	299.6	V	299.0	-1.6	20.0	54.0
4899.849699	37.2	249.9	V	230.0	0.7	16.8	54.0

- Calculation Formula:

1. POL. H = Horizontal, POL. V = Vertical
2. Peak or CAverage = Reading (Receiver Reading) + Corr.
3. Corr. (Correction Factor) = Antenna Factor+ Cable Loss –Amplifier Gain
4. Margin = Limit - Peak or CAverage



6. LIST OF TEST EQUIPMENT

<u>Type</u>	<u>Manufacturer</u>	<u>Model Name</u>	<u>Serial Number</u>	<u>Calibration Cycle</u>	<u>CAL Date</u>
<u>Conducted Emission</u>					
<input checked="" type="checkbox"/> EMI Test Receiver	Rohde & Schwarz	ESCI	100584	1 year	12.28.2015
<input checked="" type="checkbox"/> LISN	Rohde & Schwarz	ESH3-Z5	100282	1 year	06.09.2016
<input checked="" type="checkbox"/> LISN	Rohde & Schwarz	ENV216	100073	1 year	12.28.2015
<input checked="" type="checkbox"/> Software	Rohde & Schwarz	EMC32	-	-	-
<u>Radiated Emission</u>					
-For measurement below 1 GHz					
<input checked="" type="checkbox"/> EMI Test Receiver	Rohde & Schwarz	ESI40	831564103	1 year	03.30.2016
<input type="checkbox"/> Trilog Antenna	Schwarzbeck	VULB9160	3301	2 year	11.17.2014
<input checked="" type="checkbox"/> Trilog Antenna	Schwarzbeck	VULB9168	255	2 year	04.15.2015
<input checked="" type="checkbox"/> 6dB Attenuator	HP	8491A	24257	2 year	04.15.2015
<input checked="" type="checkbox"/> Antenna master	HD GmbH	MA240	240/520	N/A	-
<input checked="" type="checkbox"/> Antenna master controller	HD GmbH	HD 100	100/637	N/A	-
<input checked="" type="checkbox"/> Turn Table	EMCO	1060-2M	-	N/A	-
<input checked="" type="checkbox"/> Turn Table controller	EMCO	2090	9702-1224	N/A	-
<input type="checkbox"/> EMI Test Receiver	Rohde & Schwarz	ESU 26	100241	1 year	05.27.2016
<input type="checkbox"/> Antenna master	INNCO Systems	MA4000-EP	MA4000/283	N/A	-
<input type="checkbox"/> Turn Table	INNCO Systems	DT3000-3T	DT3000/69	N/A	-
<input checked="" type="checkbox"/> Software	Rohde & Schwarz	EMC32	-	-	-
-For measurement above 1 GHz					
<input checked="" type="checkbox"/> EMI Test Receiver	Rohde & Schwarz	ESI40	831564103	1 year	03.30.2016
<input type="checkbox"/> Antenna master	HD GmbH	MA240	240/520	N/A	-
<input type="checkbox"/> Antenna master controller	HD GmbH	HD 100	100/637	N/A	-
<input checked="" type="checkbox"/> Antenna master	INNCO Systems	MA4000-XP-ET	48709515	N/A	-
<input checked="" type="checkbox"/> Antenna master controller	INNCO Systems	CO 3000	CO 3000/870/ 35990515	N/A	-
<input checked="" type="checkbox"/> Turn Table	EMCO	1060-2M	-	N/A	-
<input checked="" type="checkbox"/> Turn Table controller	EMCO	2090	9702-1224	N/A	-
<input type="checkbox"/> Power Amplifier	CERNEX	CBLU1183540	21691	1 year	07.04.2016
<input checked="" type="checkbox"/> Power Amplifier	CERNEX	CBLU5183530	24348	1 year	06.07.2016
<input checked="" type="checkbox"/> Horn Antenna	Schwarzbeck	BBHA 9120D	296	2 year	10.07.2014
<input type="checkbox"/> EMI Test Receiver	Rohde & Schwarz	ESU 26	100241	1 year	05.27.2016
<input type="checkbox"/> Turn Table	INNCO Systems	DT3000-3T	DT3000/69	N/A	-
<input checked="" type="checkbox"/> Software	Rohde & Schwarz	EMC32	-	-	-



7. CONCLUSION

The data collected shows that the **EUT Type: Portable Wrist Device, Model: LG-W280, FCC ID: ZNFW280** complies with §15.107 and §15.109 of the FCC rules.