



## FCC PART 15D

# MEASUREMENT AND TEST REPORT

For

**CETIS, INC.**

5025 GALLEY ROAD, COLORADO SPRINGS, CO 80915, USA

**FCC ID: ZTUNDc2210SN**

<b>Report Type:</b> Original Report	<b>Product Type:</b> DECT iPhone (Base)
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<b>Report Number:</b> <u>RDG110706001-00FP</u>	
<b>Report Date:</b> <u>2011-12-15</u>	
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**Note:** This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. (Shenzhen). This report **must not** be used by the customer to claim product certification, approval, or endorsement by NVLAP\*, or any agency of the Federal Government.

\* This report contains data that are not covered by the NVLAP accreditation and are marked with an asterisk “★” (Rev.2)

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## GENERAL INFORMATION

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### Product Description for Equipment Under Test (EUT)

The *CETIS, INC.*'s product, model number: *NDC2110S-N (FCC ID: ZTUNDC2210SN)* or the "EUT" as referred to in this report is a base of telephone, which measures approximately: 21.3 cm (L) x 14.8 cm (W) x 5.8 cm (H), input voltage: DC 48V from POE.

*Note: The series product, model NDC2105S-N, NDC2110S-N, NDC2205S-N, NDC2210S-N, The differences between them were explained for details in the attached declaration letter. We select NDC2110S-N to perform full test items.*

*\* All measurement and test data in this report was gathered from production sample serial number: 1107041 (Assigned by BACL, Shenzhen). The EUT was received on 2011-07-05.*

### Objective

This document is a test report based on the Electromagnetic Interference (EMI) tests performed on the EUT. The EMI measurements were performed according to the measurement procedure described in ANSI C63.17 – 2006, and ANSI C63.4-2009

The tests were performed in order to determine compliance with FCC Part 15, Subpart D, and section, 15.203, 15.207, 15.315, 15.317, 15.319 and 15.323 rules.

### Related Submittal(s)/Grant(s)

FCC ID: ZTUNDC2210SN, FCC Part 15D submission of Handset portion.

### Test Methodology

All measurements contained in this report were conducted with ANSI C63.17 - 2006 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. All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratories Corp. (Shenzhen). The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

## Test Facility

The Test site used by Bay Area Compliance Laboratories Corp. (Shenzhen) to collect test data is located in the 6/F, the 3rd Phase of WanLi Industrial Building, ShiHua Road, FuTian Free Trade Zone Shenzhen, Guangdong, China.

Test site at Bay Area Compliance Laboratories Corp. (Shenzhen) has been fully described in reports submitted to the Federal Communication Commission (FCC). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on December 06, 2010. The facility also complies with the radiated and AC line conducted test site criteria set forth in ANSI C63.4-2009.

The Federal Communications Commission has the reports on file and is listed under FCC Registration No.: 382179. The test site has been approved by the FCC for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, Bay Area Compliance Laboratories Corp. (Shenzhen) is an ISO/IEC 17025 accredited laboratory, and is accredited by National Voluntary Laboratory Accredited Program (Lab Code 200707-0).



The current scope of accreditations can be found at <http://ts.nist.gov/Standards/scopes/2007070.htm>

## SYSTEM TEST CONFIGURATION

### Description of Test Configuration

The EUT was configured for TBR6 mode, which is provided by the manufacturer.

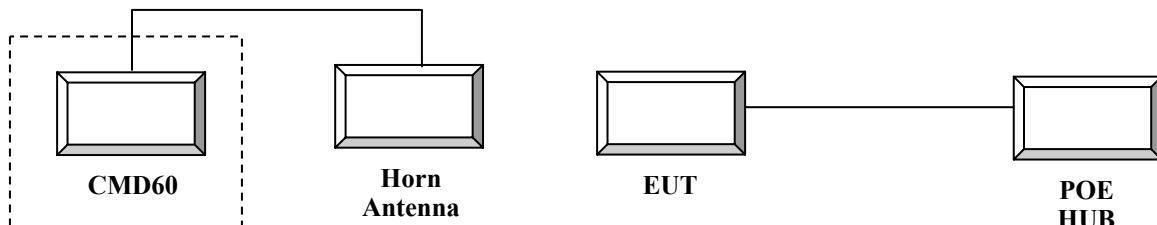
### Equipment Modifications

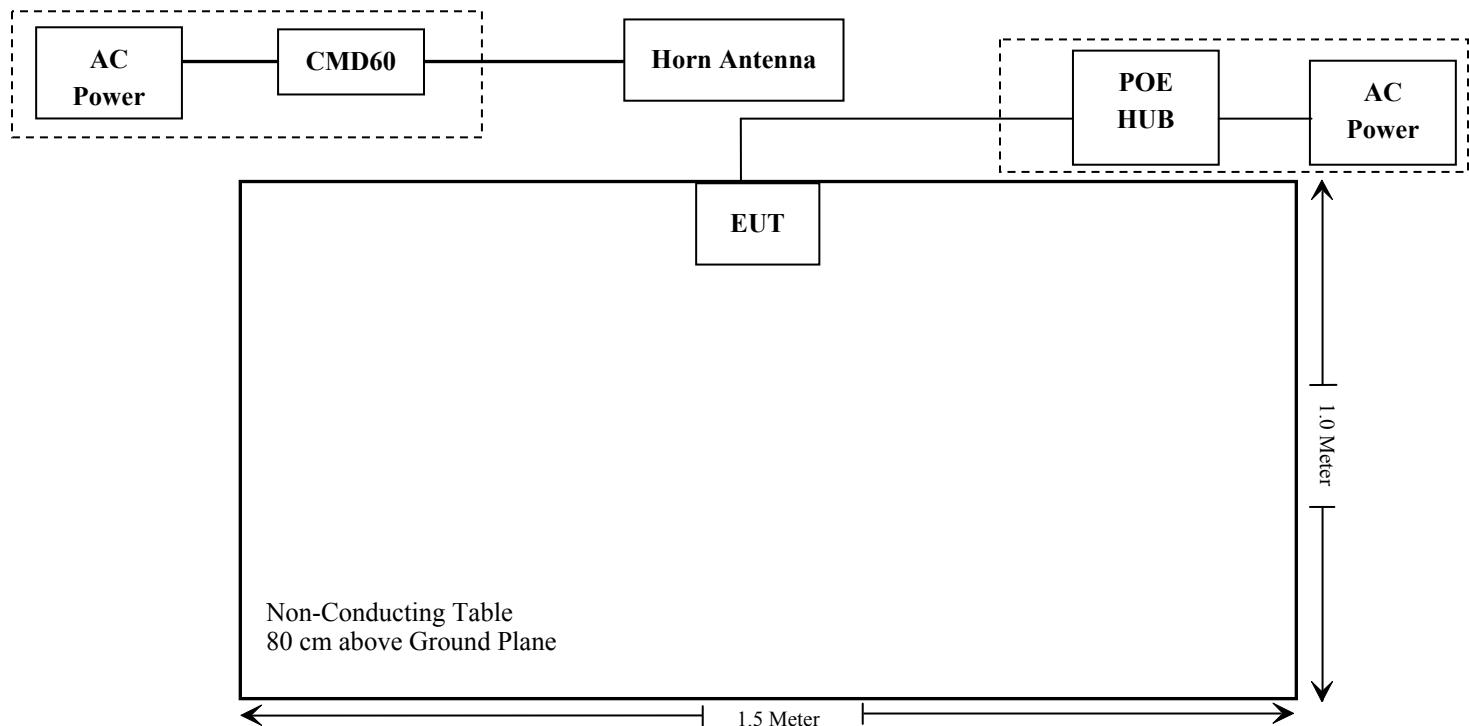
Modification was made to the EUT, which please refer to the internal photos for details.

### Local Support Equipment List and Details

Manufacturer	Description	Model	Serial Number	FCC ID
R&S	Digital Radio-Communication Tester	CMD60	829902/026	DoC
BROWAN	Single Port POE HUB	BE3011	PD-6070G300	DoC

### Configuration of Test Setup



**Block Diagram of Test Setup**

## **SUMMARY OF TEST RESULTS**

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<b>FCC Rules</b>	<b>Description of Test</b>	<b>Result</b>
§15.319 (i) & §2.1091	RF Radiation Exposure	Compliance
§15.317, §15.203	Antenna Requirement	Compliance
§15.315, §15.207	Conducted Emission	Compliance
§15.323 (a)	Emission Bandwidth	Compliance
§15.319 (c)	Peak Transmit Power	Compliance
§15.319 (d)	Power Spectral Density	Compliance
§15.323 (d)	Emission Inside and Outside the sub-band	Compliance
§15.319 (g)	Radiated Emission	Compliance
§15.323 (f)	Frequency Stability	Compliance
§15.323 (c)(e) §15.319 (f)	Specific Requirements for UPSCS	Compliance

## FCC §15.319 (i) & §2.1091 - RF RADIATION EXPOSURE

### Limit

According to FCC §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to §1.1310 and §2.1091 RF exposure is calculated.

#### Limits for Maximum Permissible Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm <sup>2</sup> )	Averaging Time (minute)
<b>Limits for General Population/Uncontrolled Exposure</b>				
0.3-1.34	614	1.63	*(100)	30
1.34-30	842/f	2.19/f	*(180/f <sup>2</sup> )	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

\* = Plane-wave equivalent power density

### Test Data

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = \frac{PG}{4\pi R^2}$$

Where: S = power density (in appropriate units, e.g. mW/cm<sup>2</sup>)

P = power input to the antenna (in appropriate units, e.g., mW).

G = power gain of the antenna in the direction of interest relative to an isotropic radiator, the power gain factor, is normally numeric gain.

R = distance to the center of radiation of the antenna (appropriate units, e.g., cm)

Maximum peak output power at antenna input terminal: 19.50 (dBm)

Maximum peak output power at antenna input terminal: 89.13 (mW)

Predication distance: >20 (cm)

Predication frequency: 1928.448 (MHz)

Antenna Gain (typical): 2.0 (dBi)

Antenna Gain (typical): 1.58 (numeric)

The worst case is power density at predication frequency at 20 cm: 0.028 (mW/cm<sup>2</sup>)

MPE limit for general population exposure at predication frequency: 1.0 (mW/cm<sup>2</sup>)

**Result:** The device meets FCC MPE limit at 20 cm distance.

## **FCC §15.317 & §15.203 - ANTENNA REQUIREMENT**

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### **Applicable Standard**

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section.

This product has two integrated antennas arrangement, please refer to the internal photos. The maximum gains is 2.0 dBi, fulfill the requirement of this section.

**Test Result:** Compliance.

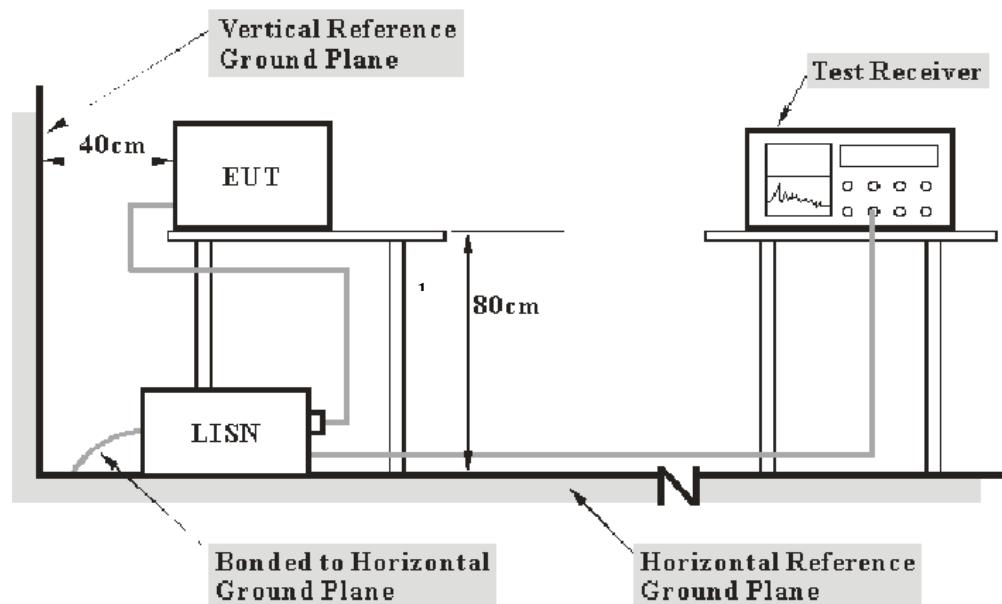
## FCC §15.315 & §15.207 - CONDUCTED EMISSIONS

### Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, and LISN.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the best estimate of the uncertainty of any conducted emissions measurement at Bay Area Compliance Laboratories Corp. (Shenzhen) is 2.4 dB.

### EUT Setup



**Note:**

1. Support units were connected to second LISN.
2. Both of LISNs (AMN) 80 cm from EUT and at the least 80 cm from other units and other metal planes support units.

The setup of EUT is according with per ANSI C63.4-2009 measurement procedure. The specification used was with the FCC §15.315 and FCC §15.207 limits.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

The spacing between the peripherals was 10 cm.

The POE hub was connected to a 120 VAC/60 Hz power source.

## EMI Test Receiver Setup

The EMI test receiver was set to investigate the spectrum from 150 kHz to 30 MHz.

During the conducted emission test, the EMI test receiver was set with the following configurations:

<b><u>Frequency Range</u></b>	<b><u>IF B/W</u></b>
150 kHz – 30 MHz	9 kHz

## Test Equipment List and Details

<b>Manufacturer</b>	<b>Description</b>	<b>Model</b>	<b>Serial Number</b>	<b>Calibration Date</b>	<b>Calibration Due Date</b>
Rohde & Schwarz	EMI Test Receiver	ESCS30	830245/006	2011-03-03	2012-03-02
Rohde & Schwarz	L.I.S.N.	ESH2-Z5	892107/021	2011-03-09	2012-03-08

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

## Test Procedure

During the conducted emission test, the POE hub was connected to the outlet of the LISN.

Maximizing procedure was performed on the six (6) highest emissions of the EUT.

All data was recorded in the Quasi-peak and average detection mode.

## Test Results Summary

According to the recorded data in following table, the EUT complied with the FCC Part 15 .207, with the worst margin reading of:

**22.54 dB at 19.075 MHz in the Neutral conductor mode**

## Test Data

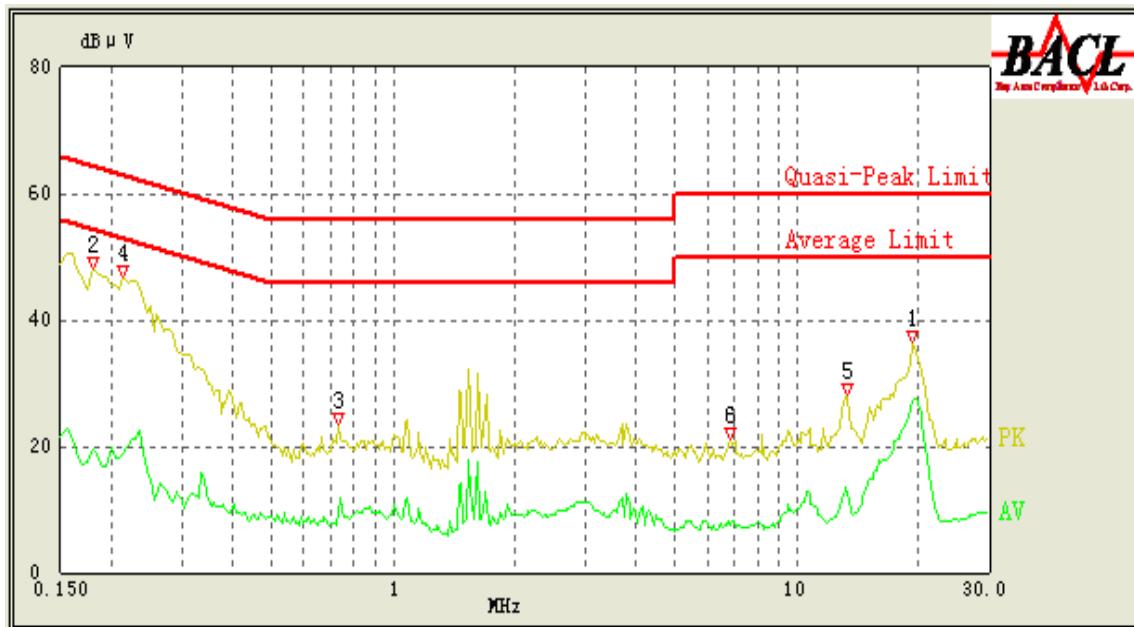
### Environmental Conditions

<b>Temperature:</b>	20 ° C
<b>Relative Humidity:</b>	56 %
<b>ATM Pressure:</b>	100.0 kPa

*The testing was performed by Jim Huang on 2011-12-15.*

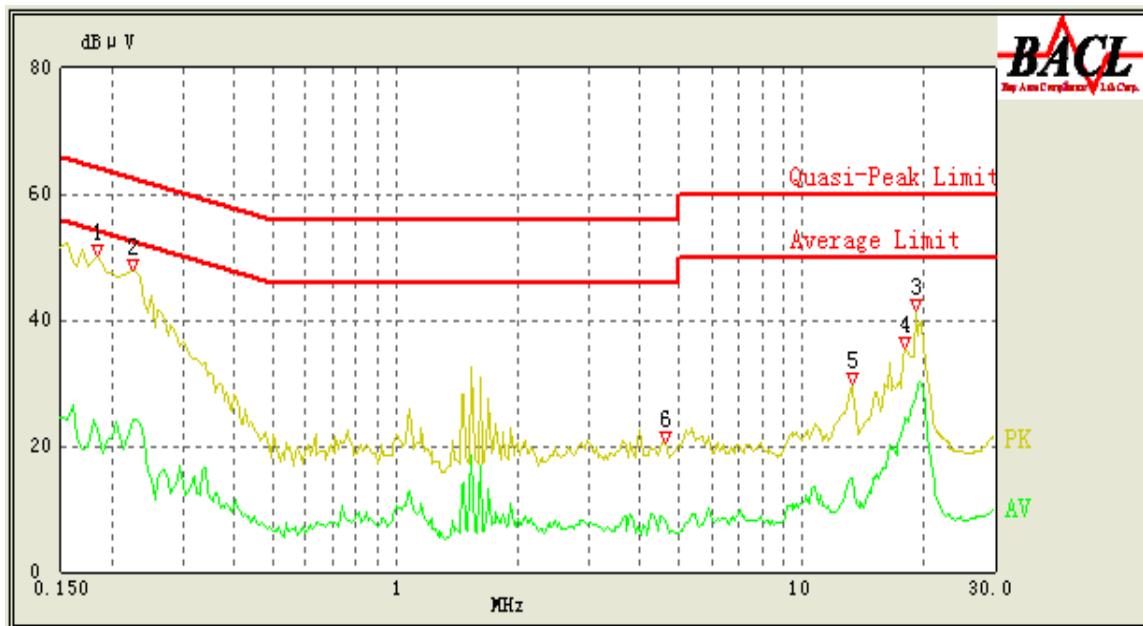
Test Mode: Talking (POE power supply)

120V/60 Hz, Line



Frequency (MHz)	Cord. Result (dB $\mu$ V)	Corrected Factor (dB)	Limit (dB $\mu$ V)	Margin (dB)	Remark (PK/QP/Ave)
19.600	27.41	11.52	50.00	22.59	Ave
0.180	41.83	10.23	65.14	23.31	QP
0.215	40.32	10.23	64.14	23.82	QP
19.405	30.50	11.52	60.00	29.50	QP
0.215	18.76	10.23	54.14	35.38	Ave
0.180	19.42	10.23	55.14	35.72	Ave
0.735	9.48	10.24	46.00	36.52	Ave
13.215	13.41	11.27	50.00	36.59	Ave
13.310	22.17	11.28	60.00	37.83	QP
0.730	14.96	10.24	56.00	41.04	QP
6.850	7.39	10.73	50.00	42.61	Ave
6.820	10.74	10.73	60.00	49.26	QP

## 120V/ 60 Hz, Neutral:



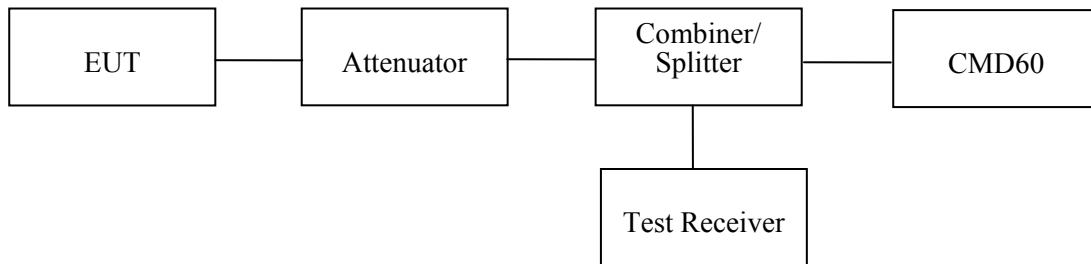
Frequency (MHz)	Cord. Result (dB $\mu$ V)	Corrected Factor (dB)	Limit (dB $\mu$ V)	Margin (dB)	Remark (PK/QP/Ave.)
19.075	27.46	11.51	50.00	22.54	Ave
0.225	41.17	10.23	63.86	22.69	QP
0.185	40.55	10.23	65.00	24.45	QP
17.930	24.39	11.49	50.00	25.61	Ave
0.225	24.17	10.23	53.86	29.69	Ave
19.095	28.38	11.51	60.00	31.62	QP
0.185	22.63	10.23	55.00	32.37	Ave
17.935	26.51	11.49	60.00	33.49	QP
13.315	14.96	11.28	50.00	35.04	Ave
13.285	24.05	11.28	60.00	35.95	QP
4.620	8.29	10.57	46.00	37.71	Ave
4.620	13.43	10.57	56.00	42.57	QP

## FCC §15.323 (a) - EMISSION BANDWIDTH

### Applicable Standard

Operation shall be contained within the 1920–1930 MHz band. The emission bandwidth shall be less than 2.5 MHz and greater than 50 kHz.

The emission bandwidth is measured in accordance with ANSI C63.17 sub-clause 6.1.3 using the setup below:



The width, in Hz, of the signal between two points, one below the carrier center frequency and one above the carrier center frequency, that is 26 dB down relative to the maximum level of the modulated carrier. It is based on the use of measurement instrumentation employing a peak detector function with an instrument resolution bandwidth approximately equal to 1% of the emission band-width of the device under measurement. [Extraction from 47 CFR 15, subpart D, 15.303 (C)].

### Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

## Test Data

### Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	56 %
ATM Pressure:	100.0 kPa

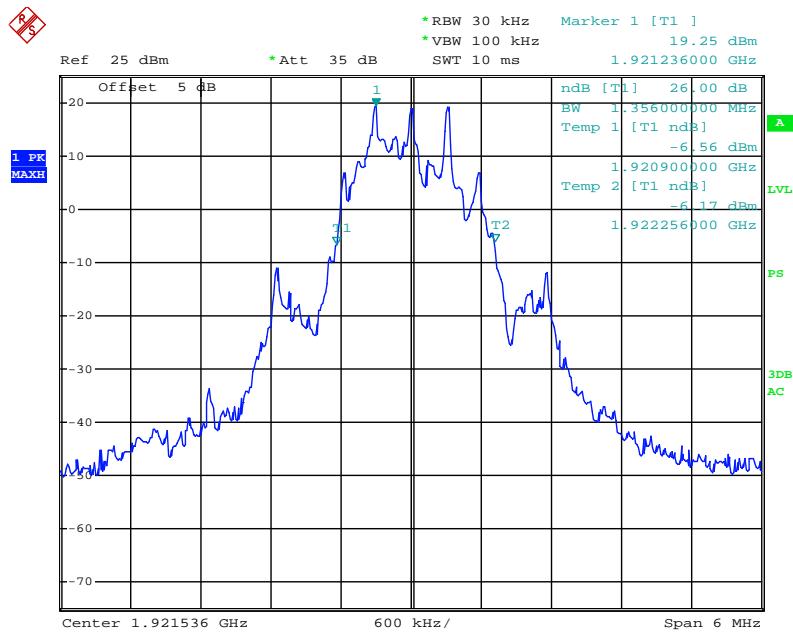
The testing was performed by Jim Huang on 2011-09-09.

Test Mode: Transmitting

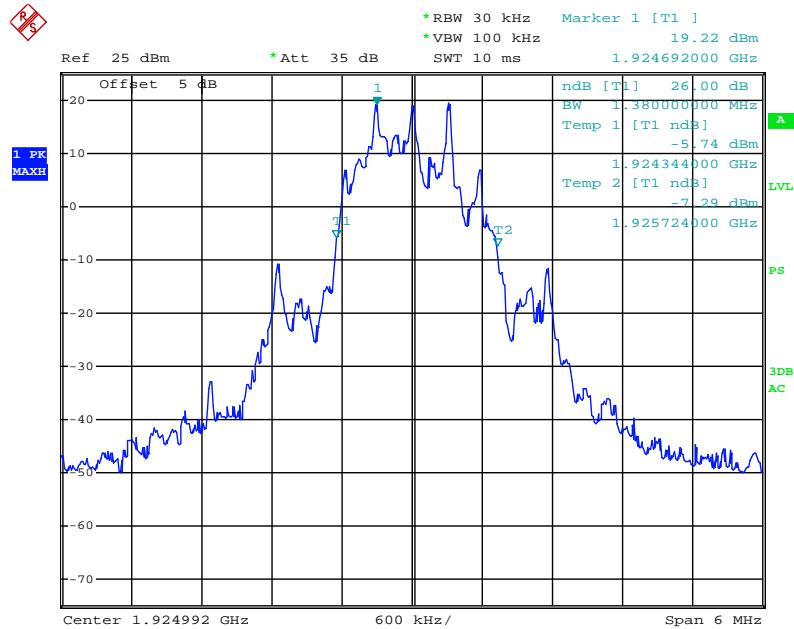
Channel	Center Frequency (MHz)	26 dB Bandwidth (MHz)	Limit
Low	1921.536	1.356	50 kHz < OBW < 2.5 MHz
Middle	1924.992	1.380	50 kHz < OBW < 2.5 MHz
High	1928.448	1.368	50 kHz < OBW < 2.5 MHz

**Test Result:** Compliance, please refer to the attached plots.

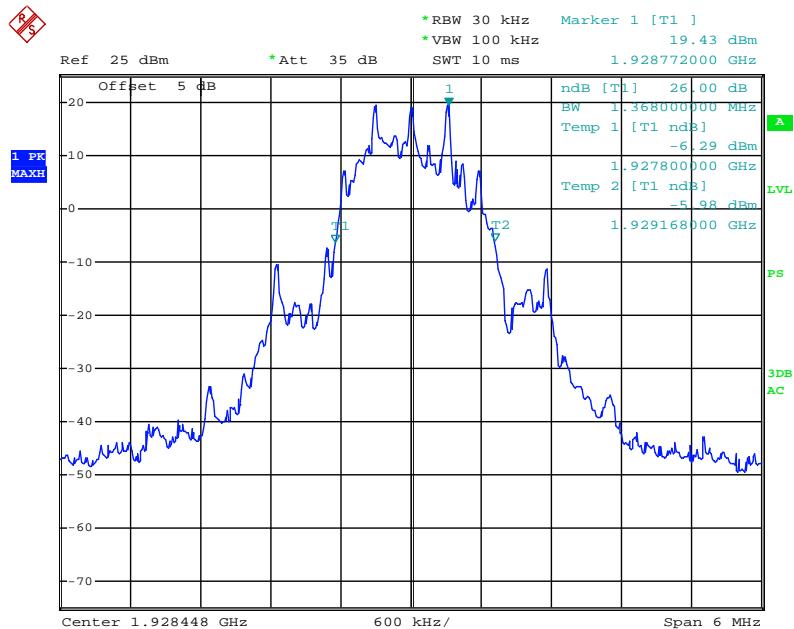
### Low Channel



Date: 9.SEP.2011 14:48:33

**Middle Channel**

Date: 9.SEP.2011 14:58:12

**High Channel**

Date: 9.SEP.2011 14:55:48

## FCC §15.319 (c) - PEAK TRANSMIT POWER

### Applicable Standard

The peak transmit power is according to ANSI C63.17-2006 §6.1.2

Per FCC Part15.319 (a), Peak transmit power shall not exceed 100 microwatts multiplied by the square root of the emission bandwidth in hertz.

Per FCC Part15.319 (e), the peak transmit power shall be reduced by the amount in decibels that the maximum directional gain of the antenna exceeds 3 dBi.

Calculation of Peak Transmit Power Limit (P<sub>max</sub>):

$$P_{max} = 100\mu\text{w} \times (EBW)^{1/2}$$

EBW is the transmit emission bandwidth in Hz determined in the other test item:

### Test Procedure

Using the manufacturer's information on occupied bandwidth set the spectrum analyzer as follows:

RBW	≥ Emission bandwidth
Video bandwidth	≥ RBW
Span	Zero
Center frequency	Nominal center frequency of channels
Amplitude scale	Log (linear may be used if analyzer has sufficient linear dynamic range and accuracy)
Detection	Peak detection
Trigger	Video
Sweep rate	Sufficiently rapid to permit the transmit pulse to be resolved accurately

### Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

## Test Data

### Environmental Conditions

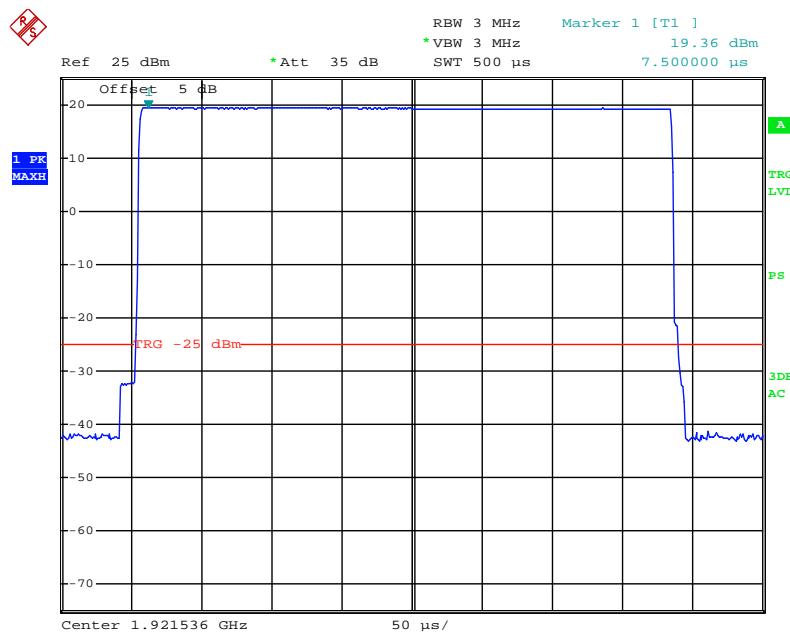
<b>Temperature:</b>	20 °C
<b>Relative Humidity:</b>	56 %
<b>ATM Pressure:</b>	100.0 kPa

The testing was performed by Jim Huang on 2011-09-09.

**Test Result:** Compliance, please refer to the following table and plots.

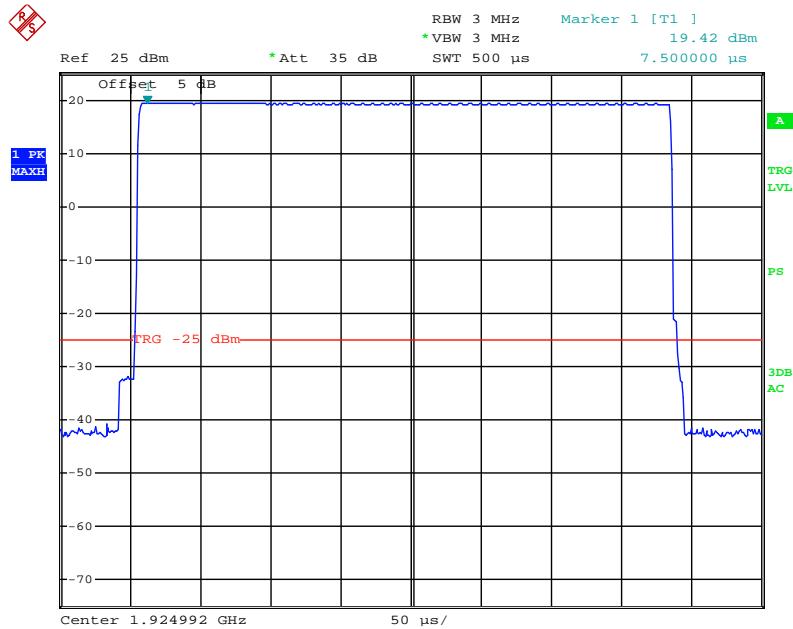
Frequency (MHz)	Peak Transmit Power (dBm)	Limit (dBm)
1921.536	19.36	20.66
1924.992	19.42	20.69
1928.448	19.50	20.68

### Low Channel



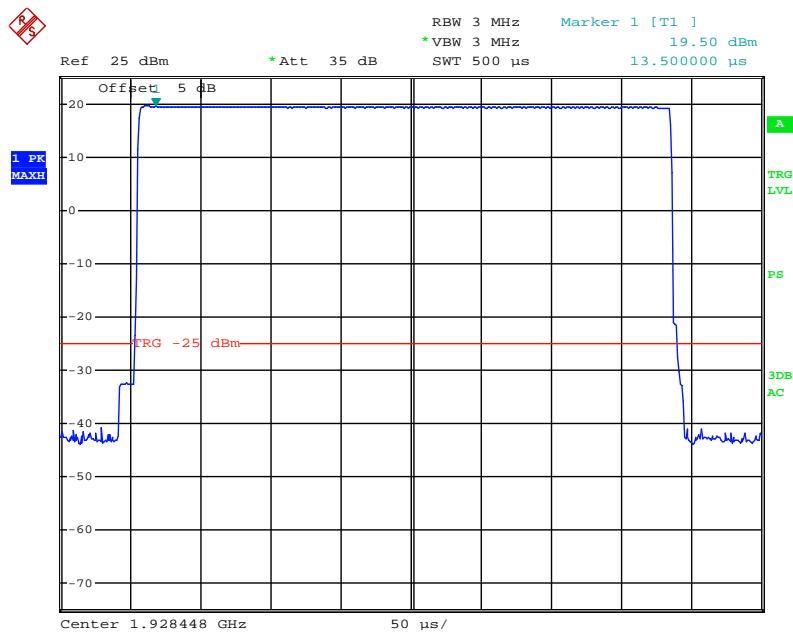
Date: 9.SEP.2011 14:50:59

## Middle Channel



Date: 9.SEP.2011 14:53:25

## High Channel



Date: 9.SEP.2011 14:54:05

## FCC §15.319 (d) - POWER SPECTRAL DENSITY

### Applicable Standard

The power spectral density is according to ANSI C63.17-2006 §6.1.5

The average pulse energy in a 3 kHz bandwidth is divided by the pulse duration.

The power spectral density shall not exceed 3mW in any 3 kHz bandwidth as measured with a spectrum analyzer having a resolution bandwidth of 3 kHz.

### Test Procedure

Using the manufacturer's information on occupied bandwidth set the spectrum analyzer as follows:

RBW	3 kHz
Video bandwidth	$\geq 3 \times \text{RBW}$
Span	Zero span at frequency with the maximum level (frequency determined in 6.1.3 if the same type of signal (continuous versus burst) was used in 6.1.3)
Center frequency	Spectral peak as determined in 6.1.3
Sweep time	For burst signals, sufficient to include essentially all of the maximum length burst at the output of a 3 kHz filter (e.g., maximum input burst duration plus 600 $\mu\text{s}$ ). For continuous signals, 20 ms.
Amplitude scale	Log power
Detection	Sample detection and averaged for a minimum of 100 sweeps
Trigger	External or internal

### Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

### Test Data

#### Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	56 %
ATM Pressure:	100.0 kPa

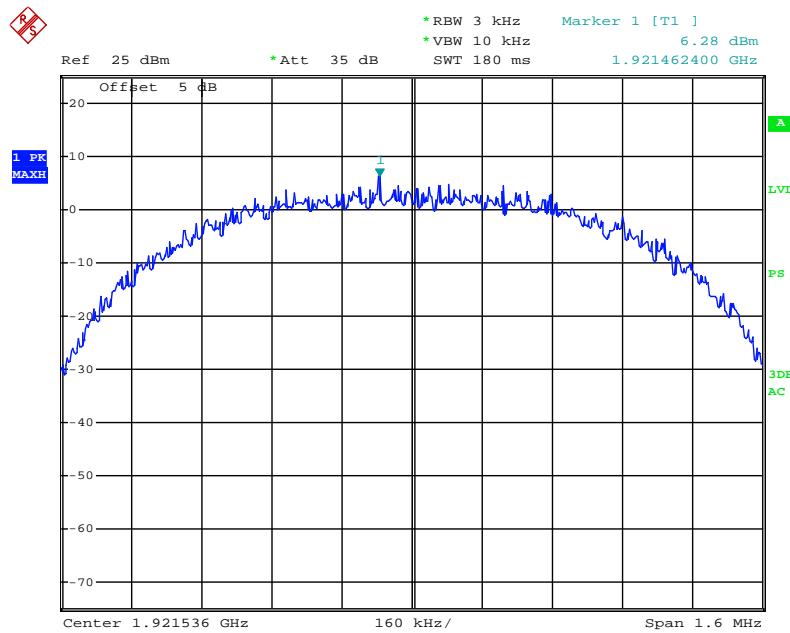
*The testing was performed by Jim Huang on 2011-09-09.*

*Test Mode: Transmitting*

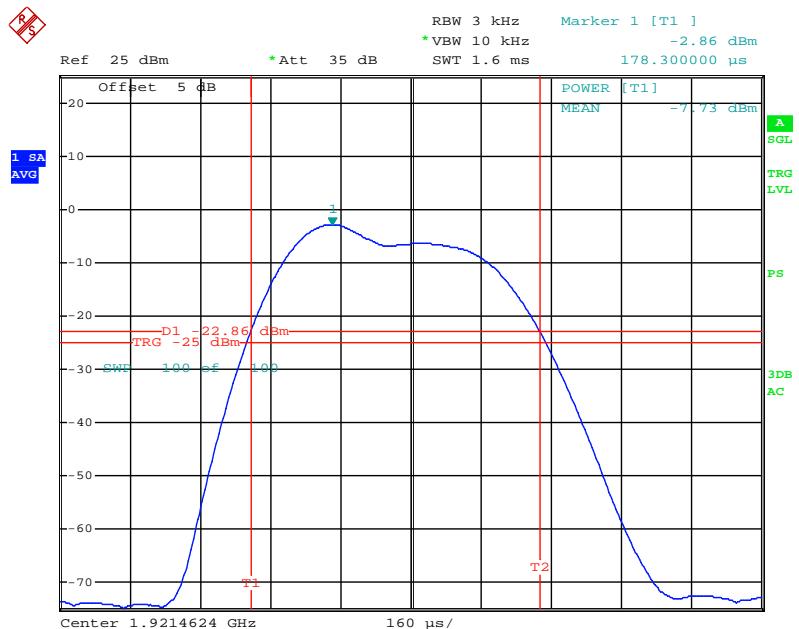
**Test Result:** Compliance, please refer to following tables and plots

Frequency (MHz)	Power Spectral Density		Limit (mW/3 kHz)	Result
	(dBm/3 kHz)	(mW/3 kHz)		
1921.536	-7.73	0.16	3	Pass
1924.992	-9.45	0.11	3	Pass
1928.448	-9.19	0.12	3	Pass

### Low Channel

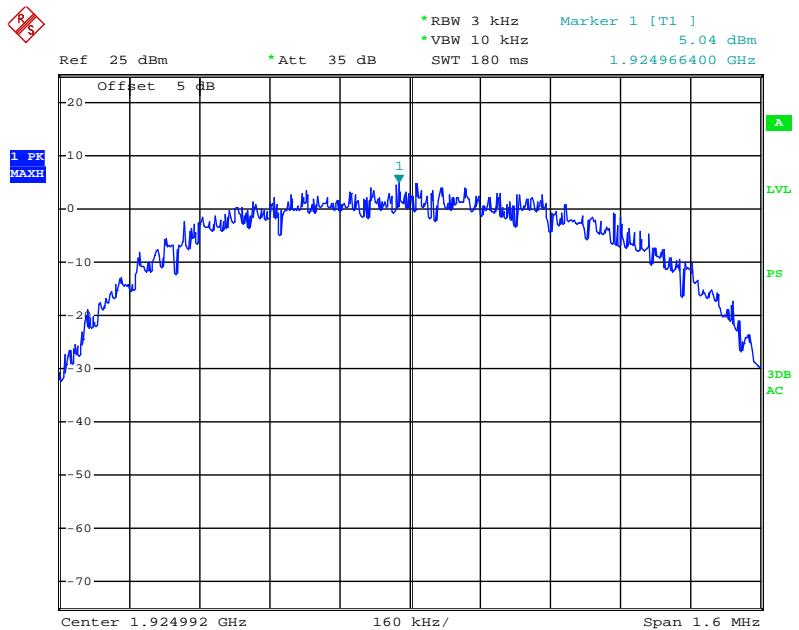


Date: 9.SEP.2011 15:08:28

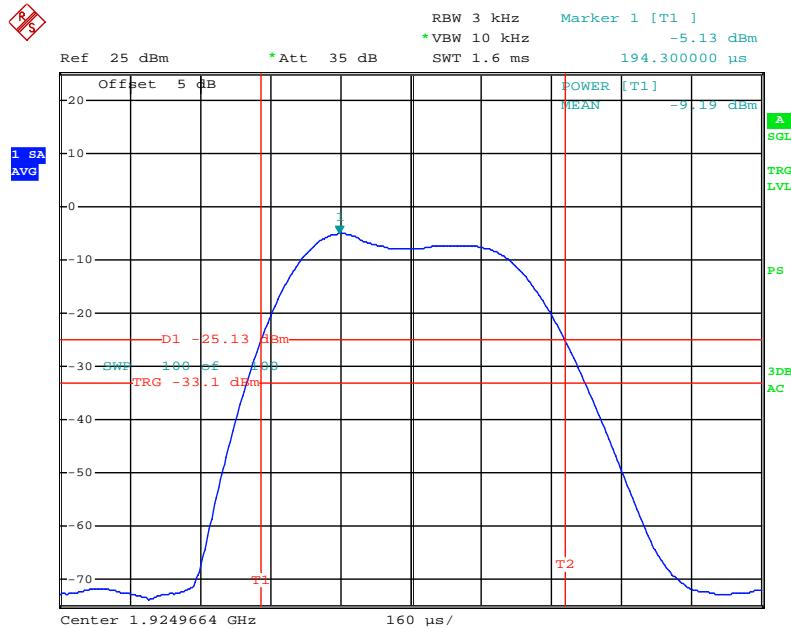


Date: 9.SEP.2011 15:10:17

### Middle Channel

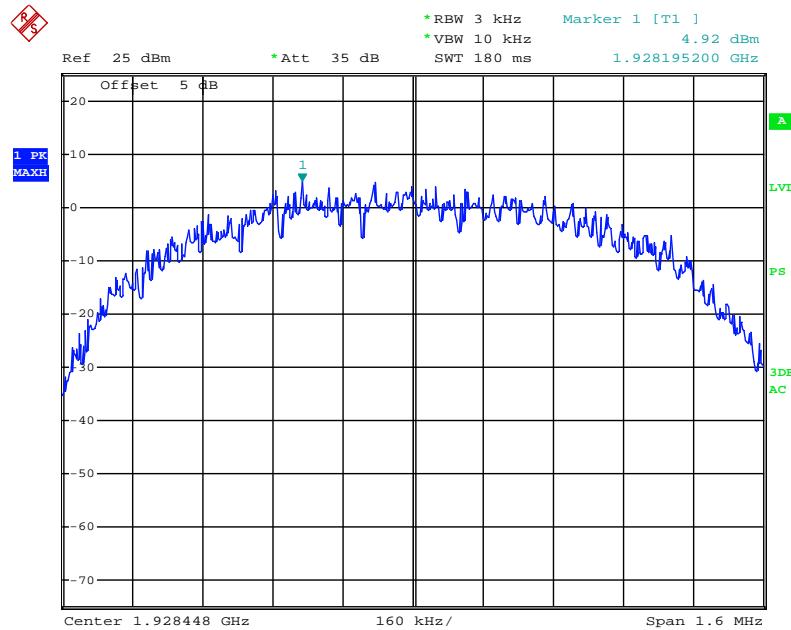


Date: 9.SEP.2011 15:13:26

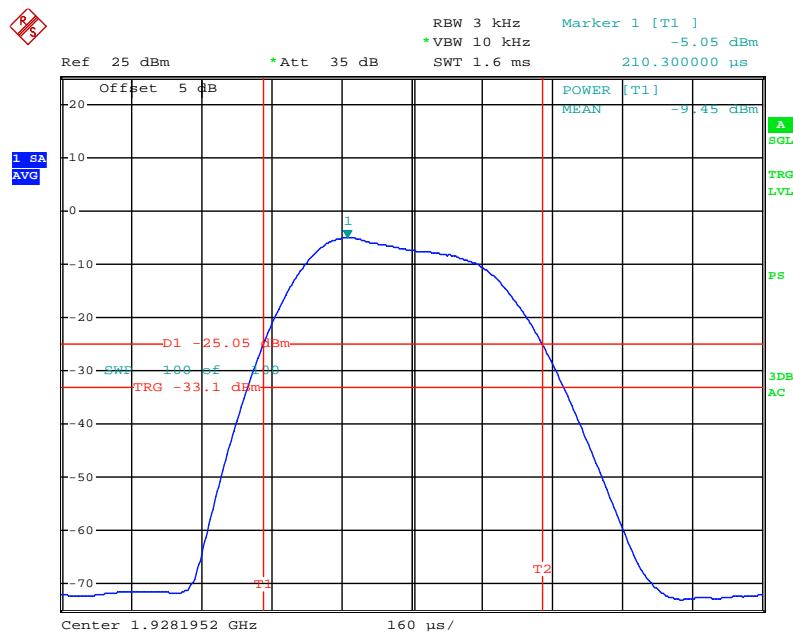


Date: 9.SEP.2011 15:16:33

### High Channel



Date: 9.SEP.2011 15:19:00



Date: 9.SEP.2011 15:20:38

## FCC §15.323 (d) - EMISSION INSIDE AND OUTSIDE THE SUB-BAND

### Applicable Standard

Emissions inside the sub-band must comply with the following emission mask:

1. In the bands between 1B and 2B measured from the center of the emission bandwidth the total power emitted by the device shall be at least 30 dB below the transmit power permitted for that device;
2. in the bands between 2B and 3B measured from the center of the emission bandwidth the total power emitted by an intentional radiator shall be at least 50 dB below the transmit power permitted for that radiator;
3. in the bands between 3B and the sub-band edge the total power emitted by an intentional radiator in the measurement bandwidth shall be at least 60 dB below the transmit power permitted for that radiator.

Where B = emission bandwidth

Emission Outside the sub-band shall be attenuated below a reference power of 112 mW (20.5 dBm) as follows:

1. 30 dB between the sub-band and 1.25 MHz above or below the sub-band;
2. 50 dB between 1.25 and 2.5 MHz above or below the sub-band;
3. 60 dB at 2.5 MHz or greater above or below the sub-band.

### Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed per the NVLAP requirements, traceable to NIST.

### Test Data

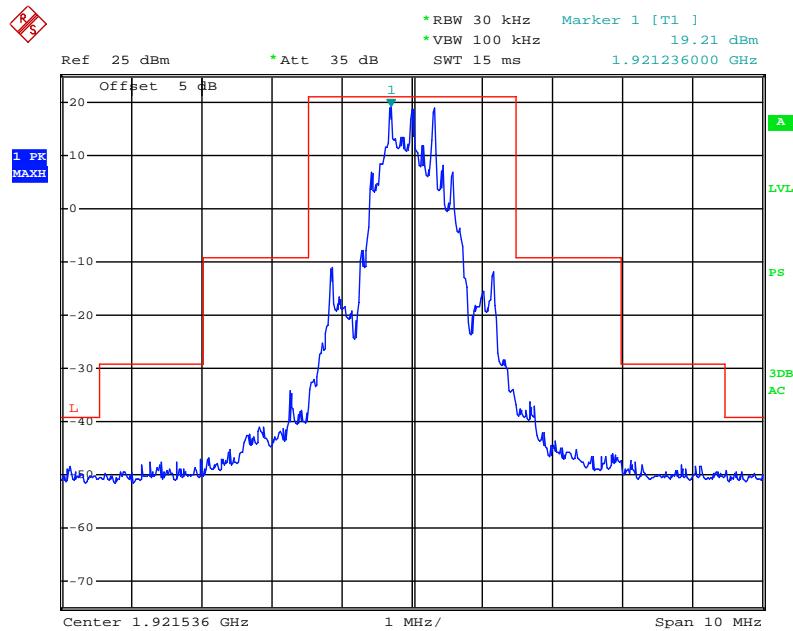
#### Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	56 %
ATM Pressure:	100.0 kPa

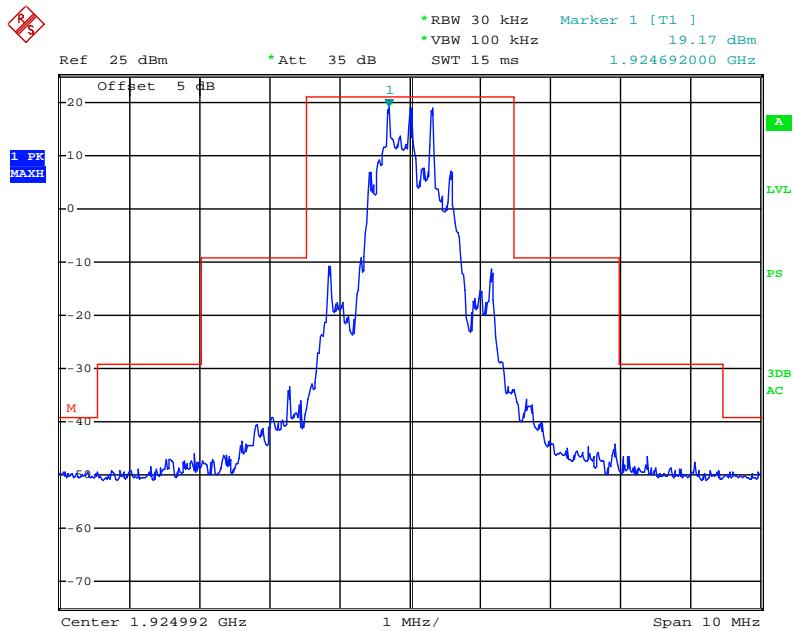
The testing was performed by Jim Huang on 2011-09-06 to 2011-09-15.

Test Mode: Transmitting

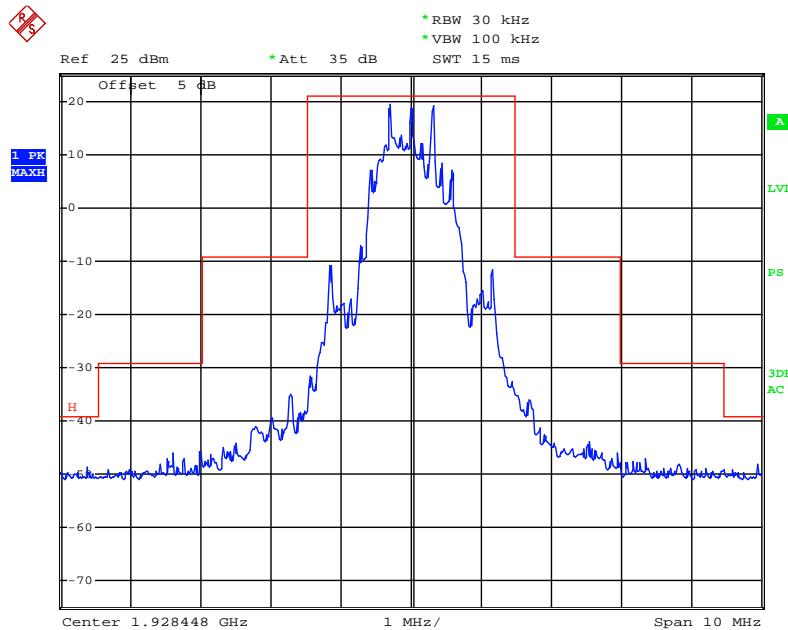
**Test Result:** Compliance, please refer to following plots

**Low Channel (Unwanted Emission inside the Sub-band)**

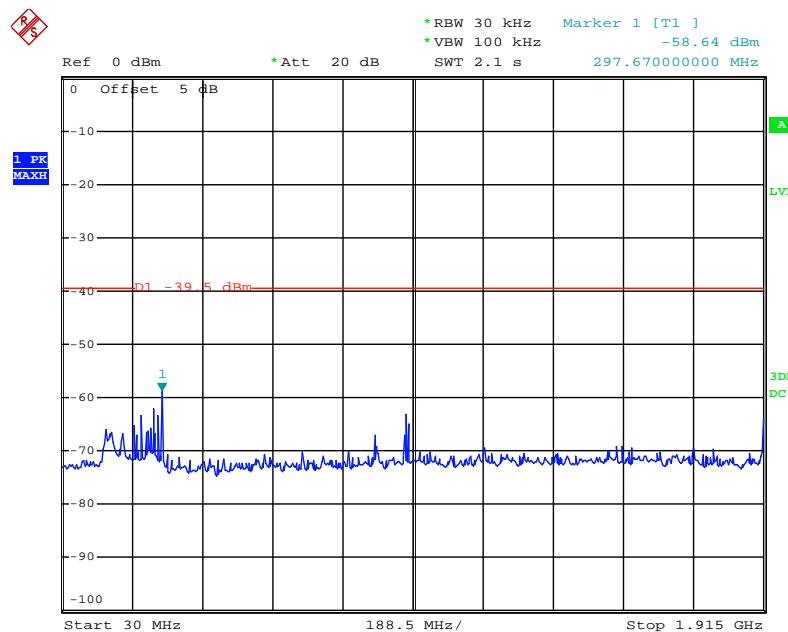
Date: 9.SEP.2011 15:02:40

**Middle Channel (Unwanted Emission inside the Sub-band)**

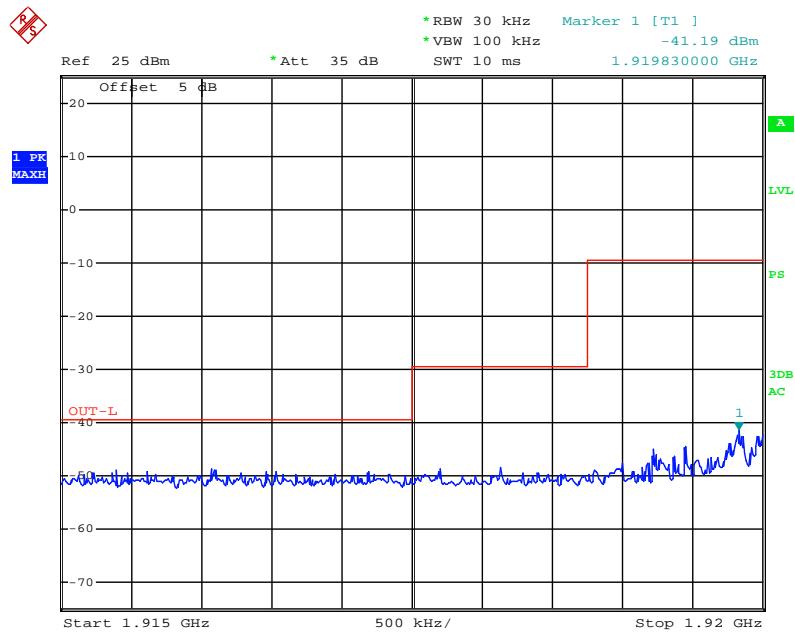
Date: 9.SEP.2011 15:00:05

**High Channel (Unwanted Emission inside the Sub-band)**

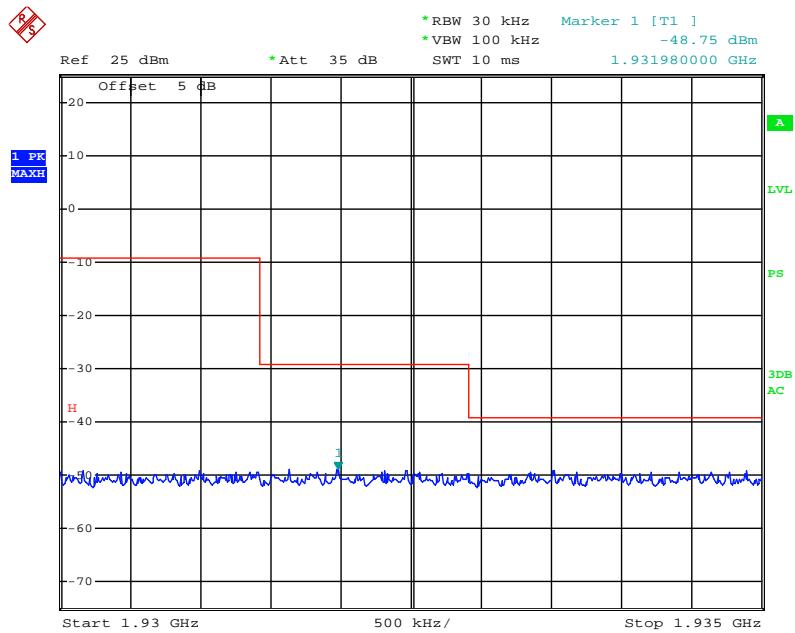
Date: 9.SEP.2011 15:01:37

**Low Channel (Unwanted Emission outside the Sub-band)**

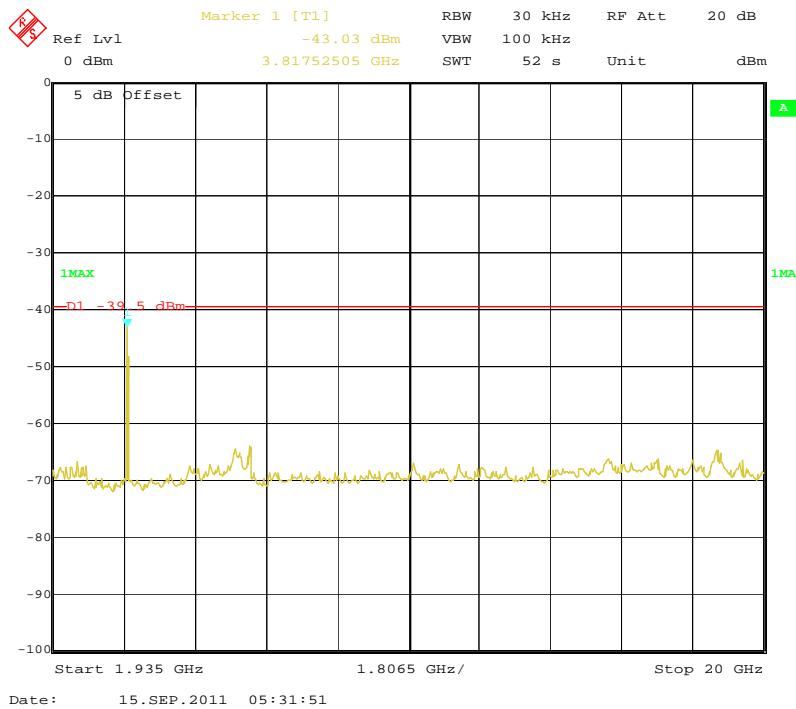
Date: 14.SEP.2011 13:35:25



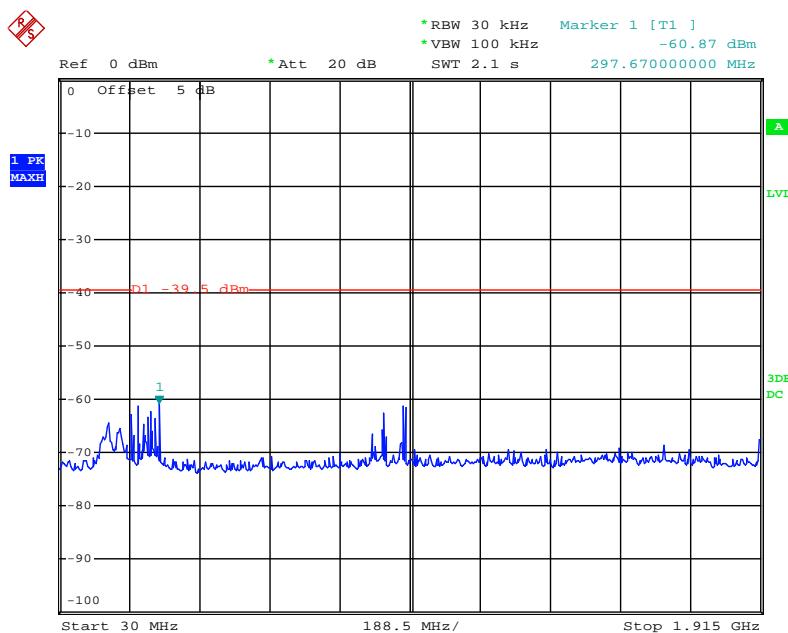
Date: 6.SEP.2011 18:17:19

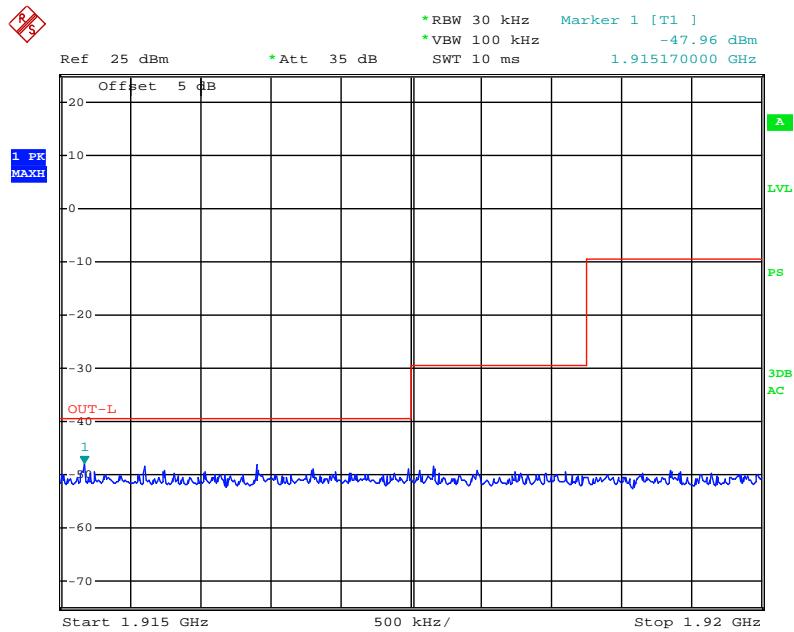


Date: 6.SEP.2011 18:16:38

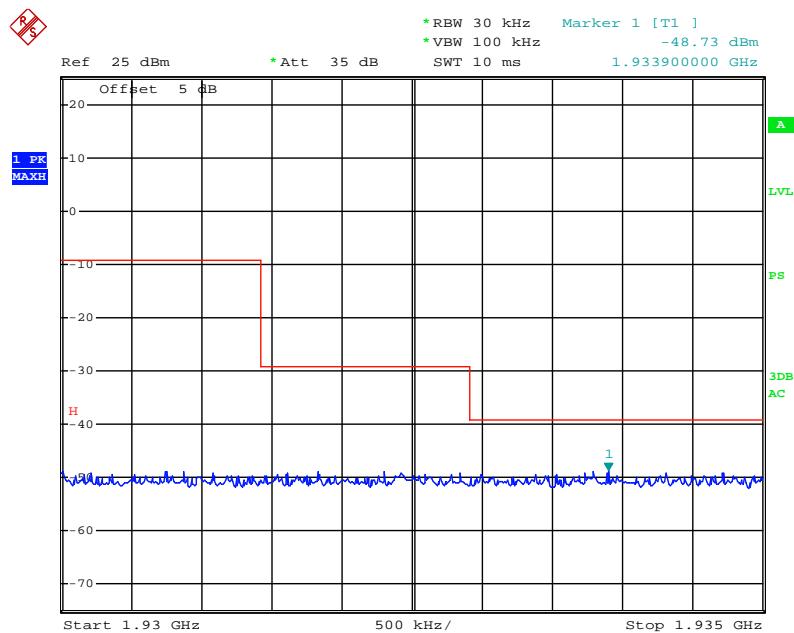


### Middle Channel (Unwanted Emission outside the Sub-band)

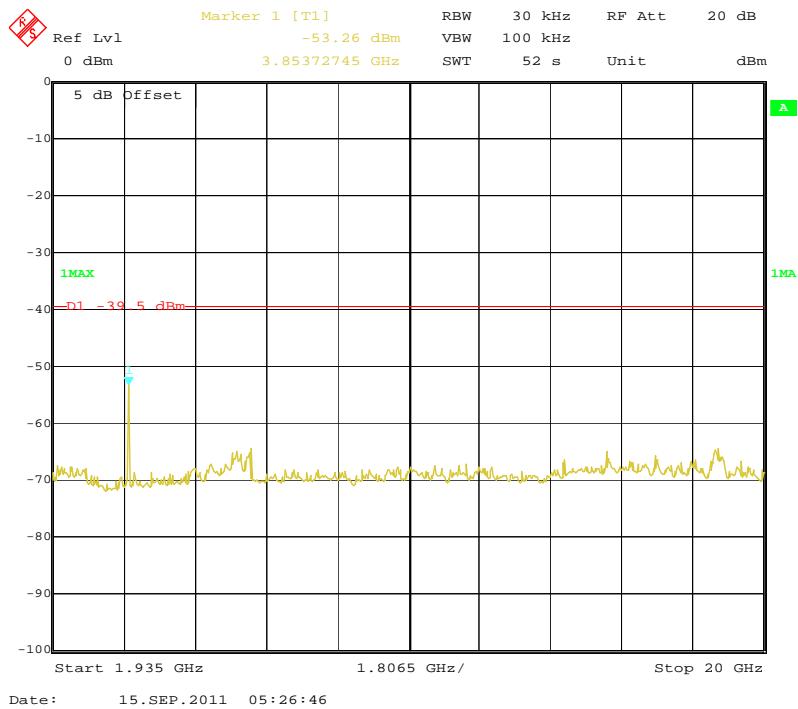




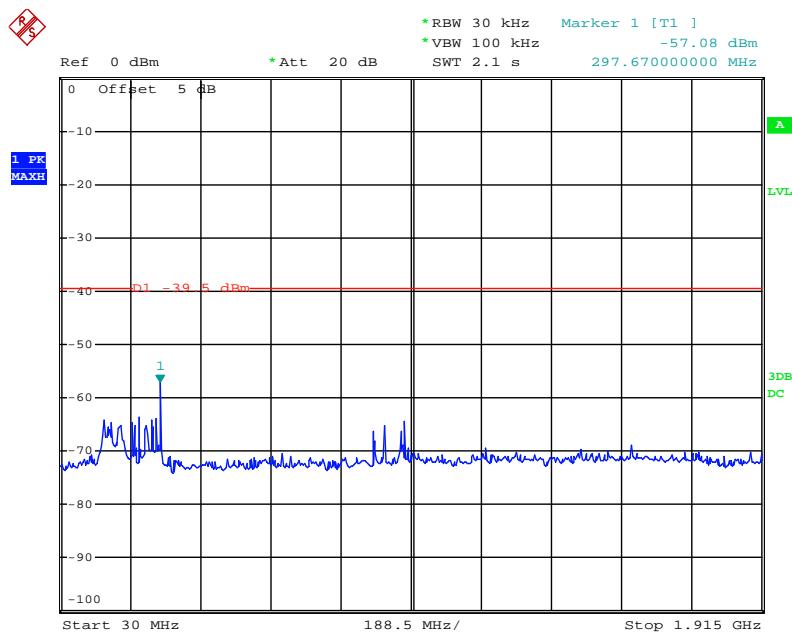
Date: 6.SEP.2011 18:17:46



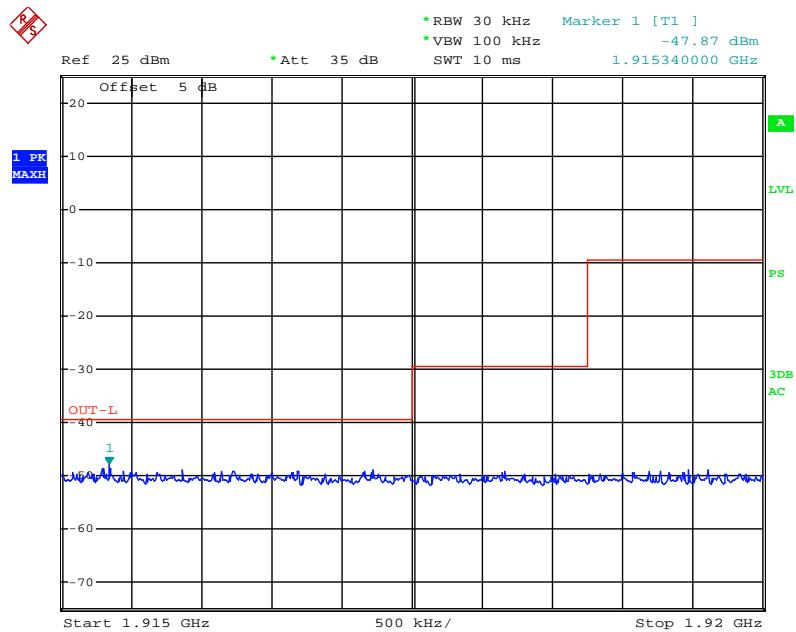
Date: 6.SEP.2011 18:15:49



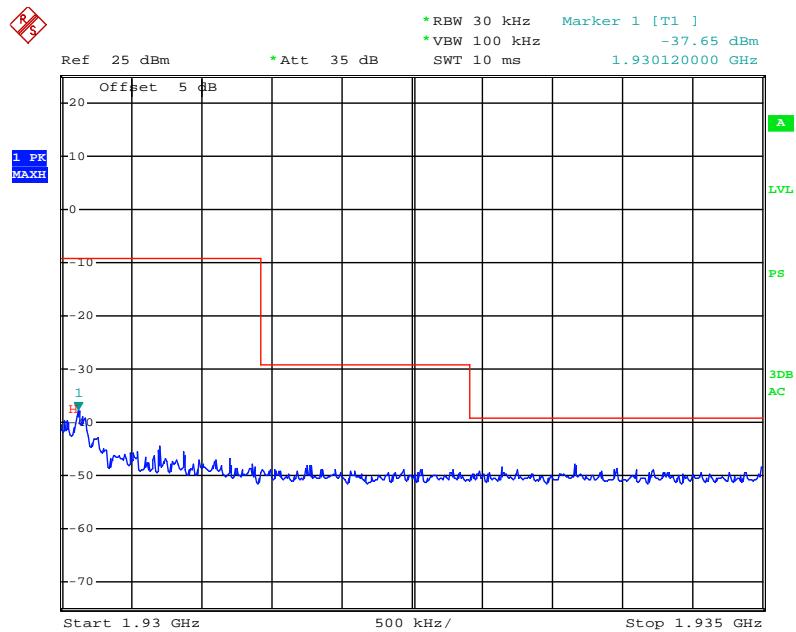
### High Channel (Unwanted Emission outside the Sub-band)



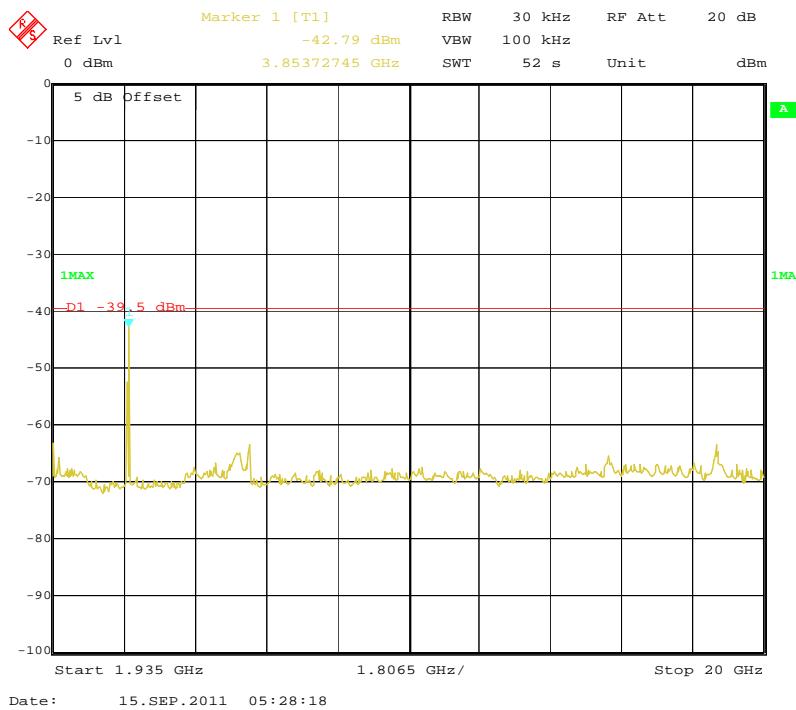
Date: 14.SEP.2011 13:33:29



Date: 6.SEP.2011 18:18:35



Date: 6.SEP.2011 18:15:10



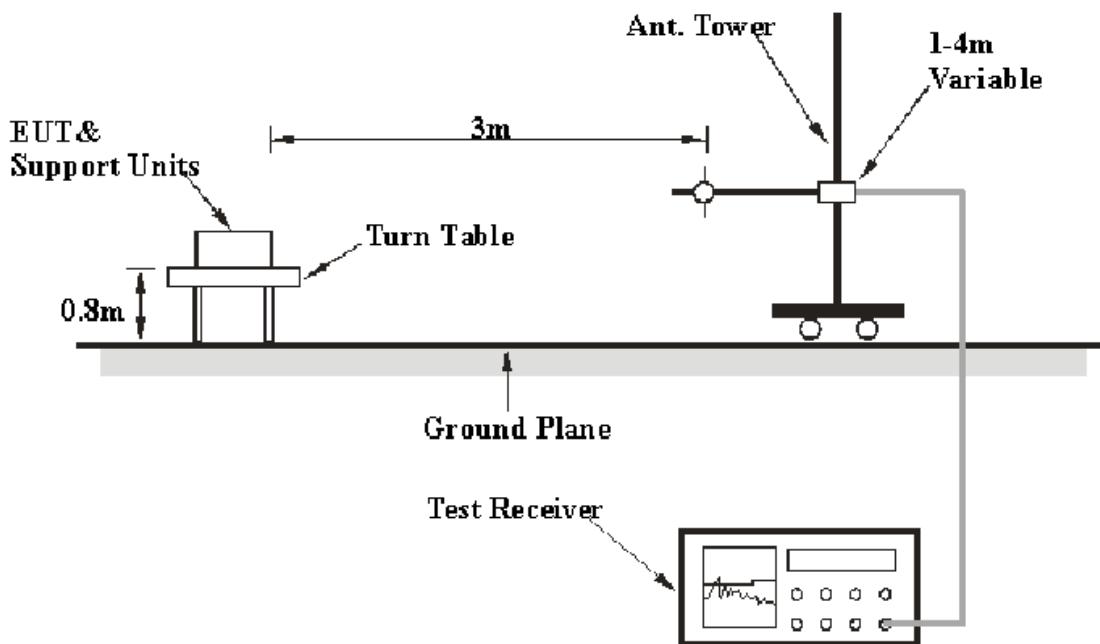
## FCC §15.319 (g) - RADIATED EMISSIONS

### Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the best estimate of the uncertainty of a radiation emissions measurement at Bay Area Compliance Laboratories Corp. (Shenzhen) is  $\pm 4.0$  dB.

### EUT Setup



The radiated emission tests were performed in the 3 meters chamber B test site, using the setup accordance with the ANSI C63.17 - 2006. The specification used was the FCC §15.319(g).

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle.

The spacing between the peripherals was 10 cm.

## EMI Test Receiver & Spectrum Analyzer Setup

The system was investigated from 30 MHz to 25 GHz.

During the radiated emission test, the EMI test receiver & Spectrum Analyzer Setup were set with the following configurations:

<u>Frequency Range</u>	<u>RBW</u>	<u>Video B/W</u>
30MHz – 1000 MHz	100 kHz	300 kHz
Above 1 GHz	1 MHz	3 MHz

## Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
HP	Amplifier	HP8447E	1937A01046	2011-08-02	2012-08-02
Rohde & Schwarz	EMI Test Receiver	ESCI	100035	2010-11-11	2011-11-10
Sunol Sciences	Broadband Antenna	JB1	A040904-1	2011-07-05	2012-07-04
Rohde & Schwarz	Signal Analyzer	FSIQ 26	609358	2011-07-08	2012-07-07
Mini-Circuits	Pre-amplifier	ZVA-213+	N/A	2011-09-12	2012-09-11
Sunol Sciences	Horn Antenna	DRH-118	A052604	2011-05-05	2012-05-04

\* **Statement of Traceability:** Bay Area Compliance Laboratories Corp. (Shenzhen) attests that all calibrations have been performed in accordance to NVLAP requirements, traceable to the NIST.

## Test Procedure

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

Data was recorded in Quasi-peak detection mode for frequency range of 30 MHz-1 GHz and peak and Average detection modes for frequencies above 1 GHz.

## Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain from the Meter Reading. The basic equation is as follows:

$$\text{Corrected Amplitude} = \text{Meter Reading} + \text{Antenna Factor} + \text{Cable Loss} - \text{Amplifier Gain}$$

The “Margin” column of the following data tables indicates the degree of compliance with the applicable limit. For example, a margin of 7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Limit} - \text{Corrected Amplitude}$$

## Test Results Summary

According to the data in the following table, the EUT complied with the FCC Part 15.319 (g), with the worst margin reading of:

**0.7 dB at 183.9875 MHz in the Horizontal polarization**

## Test Data

### Environmental Conditions

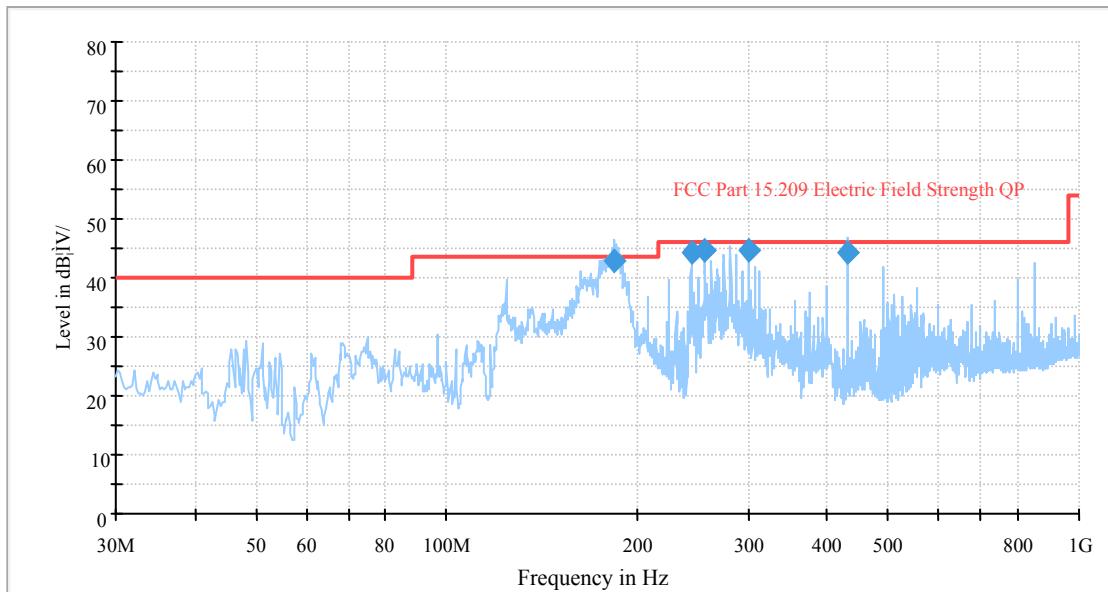
<b>Temperature:</b>	20 ° C
<b>Relative Humidity:</b>	56 %
<b>ATM Pressure:</b>	100.0 kPa

*The testing was performed by Jim Huang on 2011-09-13.*

*Below 1 GHz*

*Test mode: Transmitting (Worst case)*

Auto Test (FCC 15.209)



Frequency (MHz)	Corrected Amplitude (dB $\mu$ V/m)	Antenna height (cm)	Antenna Polarity (H/V)	Turntable position (degree)	Correction Factor (dB)	Limit (dB $\mu$ V/m)	Margin (dB)
299.992000	44.7	98.0	H	217.0	-12.4	46.0	1.3*
256.202500	44.5	134.0	H	231.0	-13.4	46.0	1.5*
243.815750	44.4	139.0	H	76.0	-13.6	46.0	1.6*
430.125000	44.4	98.0	H	284.0	-9.4	46.0	1.6*
183.987500	42.8	134.0	H	267.0	-11.1	43.5	0.7*

\*Within measurement uncertainty.

Above 1 GHz

Test Mode: Transmitting

Freq. (MHz)	S.A. Reading (dB $\mu$ V)	Detector PK/QP/Ave	Turntable Direction Degree	Test Antenna			Cable Loss (dB)	Pre- Amp. Gain (dB)	Cord. Amp. (dB $\mu$ V/m)	FCC Part 15.319(g)/209		
				Height (m)	Polar (H/V)	Factor (dB/m)				Limit (dB $\mu$ V/m)	Margin (dB)	Remarks
<b>Low Channel</b>												
9607.680	52.57	PK	196	1.3	V	39.9	5.98	26.42	72.03	74	1.97*	Harmonic
3843.072	61.31	PK	261	1.1	V	33.0	3.73	26.87	71.17	74	2.83*	Harmonic
7686.144	53.87	PK	190	1.9	V	37.7	5.27	26.64	70.20	74	3.80*	Harmonic
7686.144	52.37	PK	199	1.6	H	39.0	5.27	26.64	70.00	74	4.00*	Harmonic
11529.000	46.64	PK	194	1.2	V	41.0	6.77	26.12	68.29	74	5.71	Harmonic
3843.072	57.52	PK	120	1.8	H	33.9	3.73	26.87	68.28	74	5.72	Harmonic
9607.680	47.53	PK	194	1.9	H	41.1	5.98	26.42	68.19	74	5.81	Harmonic
11529.000	43.69	PK	233	1.2	H	40.4	6.77	26.12	64.74	74	9.26	Harmonic
5764.608	50.01	PK	193	1.3	V	36.2	4.57	26.68	64.10	74	9.90	Harmonic
5764.608	45.65	PK	129	2.2	H	37.4	4.57	26.68	60.94	74	13.06	Harmonic
<b>Middle Channel</b>												
9624.960	52.32	PK	202	1.6	V	39.9	5.98	26.42	71.78	74	2.22*	Harmonic
7699.968	54.10	PK	186	1.6	V	37.7	5.27	26.64	70.43	74	3.57*	Harmonic
3849.984	57.75	PK	313	1.5	H	33.9	3.73	26.87	68.51	74	5.49	Harmonic
7699.968	50.70	PK	187	1.7	H	39.0	5.27	26.64	68.33	74	5.67	Harmonic
9624.960	47.18	PK	116	1.2	H	41.1	5.98	26.42	67.84	74	6.16	Harmonic
11548.000	45.78	PK	205	1.2	V	41.0	6.77	26.12	67.43	74	6.57	Harmonic
5774.976	52.27	PK	202	1.1	V	36.2	4.57	26.68	66.36	74	7.64	Harmonic
3849.984	56.37	PK	190	1.5	V	33.0	3.73	26.87	66.23	74	7.77	Harmonic
11548.000	44.07	PK	235	1.5	H	40.4	6.77	26.12	65.12	74	8.88	Harmonic
5774.976	47.91	PK	110	1.4	H	37.4	4.57	26.68	63.20	74	10.80	Harmonic
<b>High Channel</b>												
3856.896	61.56	PK	165	1.8	H	33.9	3.73	26.87	72.32	74	1.68*	Harmonic
9642.240	51.43	PK	201	1.1	V	39.9	5.98	26.42	70.89	74	3.11*	Harmonic
7713.792	54.22	PK	186	1.8	V	37.7	5.27	26.64	70.55	74	3.45*	Harmonic
7713.792	52.75	PK	192	1.1	H	39.0	5.27	26.64	70.38	74	3.62*	Harmonic
3856.896	60.17	PK	144	1.7	V	33.0	3.73	26.87	70.03	74	3.97*	Harmonic
11570.688	47.10	PK	231	1.6	V	41.0	6.77	26.12	68.75	74	5.25	Harmonic
5785.344	52.36	PK	204	1.7	V	36.2	4.57	26.68	66.45	74	7.55	Harmonic
11570.688	45.37	PK	226	1.4	H	40.4	6.77	26.12	66.42	74	7.58	Harmonic
9642.240	44.70	PK	192	1.3	H	41.1	5.98	26.42	65.36	74	8.64	Harmonic
5785.344	47.52	PK	246	2.0	H	37.4	4.57	26.68	62.81	74	11.19	Harmonic

\*Within measurement uncertainty.

Field Strength of Radiated Emission (Average)							
Freq. (MHz)	Peak Cord. Amp. @3m (dB $\mu$ V/m)	Antenna Polar (H/V)	Duty Cycle Factor (dB)	Cord. Amp. (dB $\mu$ V/m)	FCC 15.319(g)		Comment
					Limit (dB $\mu$ V/m)	Margin (dB)	
Low Channel							
9607.680	72.03	V	-26.74	45.29	54	8.71	Harmonic
3843.072	71.17	V	-26.74	44.43	54	9.57	Harmonic
7686.144	70.20	V	-26.74	43.46	54	10.54	Harmonic
7686.144	70.00	H	-26.74	43.26	54	10.74	Harmonic
11529.000	68.29	V	-26.74	41.55	54	12.45	Harmonic
3843.072	68.28	H	-26.74	41.54	54	12.46	Harmonic
9607.680	68.19	H	-26.74	41.45	54	12.55	Harmonic
11529.000	64.74	H	-26.74	38.00	54	16.00	Harmonic
5764.608	64.10	V	-26.74	37.36	54	16.64	Harmonic
5764.608	60.94	H	-26.74	34.20	54	19.80	Harmonic
Middle Channel							
9624.960	71.78	V	-26.74	45.04	54	8.96	Harmonic
7699.968	70.43	V	-26.74	43.69	54	10.31	Spurious
3849.984	68.51	H	-26.74	41.77	54	12.23	Harmonic
7699.968	68.33	H	-26.74	41.59	54	12.41	Harmonic
9624.960	67.84	H	-26.74	41.10	54	12.90	Harmonic
11548.000	67.43	V	-26.74	40.69	54	13.31	Harmonic
5774.976	66.36	V	-26.74	39.62	54	14.38	Harmonic
3849.984	66.23	V	-26.74	39.49	54	14.51	Harmonic
11548.000	65.12	H	-26.74	38.38	54	15.62	Harmonic
5774.976	63.20	H	-26.74	36.46	54	17.54	Harmonic
High Channel							
3856.896	72.32	H	-26.74	45.58	54	8.42	Harmonic
9642.240	70.89	V	-26.74	44.15	54	9.85	Harmonic
7713.792	70.55	V	-26.74	43.81	54	10.19	Harmonic
7713.792	70.38	H	-26.74	43.64	54	10.36	Harmonic
3856.896	70.03	V	-26.74	43.29	54	10.71	Harmonic
11570.688	68.75	V	-26.74	42.01	54	11.99	Harmonic
5785.344	66.45	V	-26.74	39.71	54	14.29	Harmonic
11570.688	66.42	H	-26.74	39.68	54	14.32	Harmonic
9642.240	65.36	H	-26.74	38.62	54	15.38	Harmonic
5785.344	62.81	H	-26.74	36.07	54	17.93	Harmonic

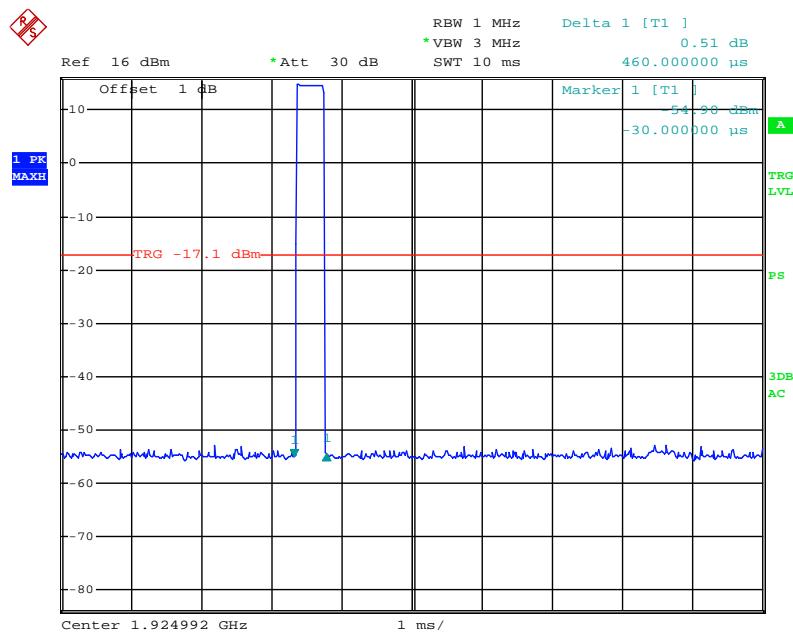
Note: Duty Cycle=Ton/Tp\*100%

Ton = 460  $\mu$ s = 0.46 ms, Tp = 10 ms

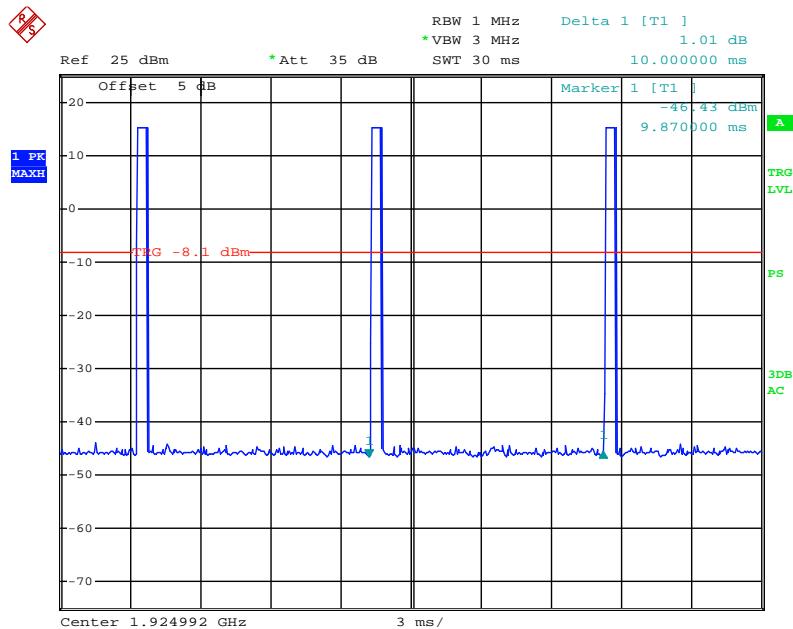
Duty Cycle = 4.6%

Duty Cycle Factor =  $20\lg(\text{Duty Cycle}) = -26.74$  dB

Average = Peak + Duty Cycle Factor

$T_{on}$ :

Date: 13.SEP.2011 08:22:18

 $T_p$ :

Date: 13.SEP.2011 08:38:10

## FCC §15.323 (f) - FREQUENCY STABILITY

### Applicable Standard

Per §15.323(f), the frequency stability of the carrier frequency of the intentional radiator shall be maintained within  $\pm 10$  ppm over 1 hour or the interval between channel access monitoring, whichever is shorter. The frequency stability shall be maintained over a temperature variation of  $-20^{\circ}$  to  $+50^{\circ}$  C at normal supply voltage, and over a variation in the primary supply voltage of 85 percent to 115 percent of the rated supply voltage at a temperature of  $20^{\circ}$  C. For equipment that is capable only of operating from a battery, the frequency stability tests shall be performed using a new battery without any further requirement to vary supply voltage.

### Test Procedure

This procedure should be carried out for each of the following test cases:

Temperature	Supply Voltage
$20^{\circ}$ C	85-115% of declared nominal voltage
$-20^{\circ}$ C	Normal
$+50^{\circ}$ C	Normal

<sup>a</sup> Use the lowest temperature at which the EUT is specified to operate if it is above  $-20^{\circ}$ C.

Using the mean carrier frequency at  $20^{\circ}$ C and at nominal supply voltage as the reference, the mean carrier frequency shall be maintained within  $\pm 10$  ppm at the two extreme temperatures (or as declared by the manufacturer) and at normal temperature (typically  $20^{\circ}$ C) at the two extreme supply voltages.

### Test Equipment List and Details

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
WUHUAN	Temperature & Humidity Chamber	HTP205	20021115	2011-06-04	2012-06-03
R & S	Digital Radio-Communication Tester	CMD60	829902/026	2010-09-26	2011-09-25

### Test Data

#### Environmental Conditions

Temperature:	20 ° C
Relative Humidity:	56 %
ATM Pressure:	100.0 kPa

The testing was performed by Jim Huang on 2011-09-13

**Test Result:** Compliance.

*Test Mode: Transmitting*

Temperature (°C)	Voltage (V <sub>AC</sub> )	Channel Frequency (MHz)	Measured Frequency Offset (kHz)	Measured Frequency Offset (ppm)	Limit (ppm)
20	102	1924.992	-11	-5.71	± 10
	120	1924.992	-10	-5.19	± 10
	138	1924.992	-14	-7.27	± 10
-20	120	1924.992	-13	-6.75	± 10
50	120	1924.992	-12	-6.23	± 10

## FCC §15.323 (c) (e) & §15.319(f) – SPECIFIC REQUIREMENTS FOR UPCS DEVICE

### Automatic Discontinuation of Transmission, FCC Part 15.319(f)

The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. The provisions in this section are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals.

#### Test Procedure:

Please according to the declaration provided by manufacturer.

#### Test result:

Meet the requirement

### Monitoring Time FCC Part 15.323 (c) (1)

Immediately prior to initiating transmission, devices must monitor the combined time and spectrum window in which they intend to transmit. For a period of at least 10 milliseconds for systems designed to use a 10 milliseconds or shorter frame period or at least 20 milliseconds for systems designed to use a 20 milliseconds frame period

#### Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.4

#### Test result:

EUT monitors the combined time and spectrum window prior to initiation of transmission. Test result please according to FCC §15.323(c) (4).

### Lower Monitoring Threshold Part 15.323 (c) (2)

The monitoring threshold must not be more than 30 dB above the thermal noise power for a bandwidth equivalent to the emission bandwidth used by the device.

#### Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.1

**Test result:** Not Apply

**Maximum Transmit Period FCC Part 15.323 (c) (3)**

If no signal above the threshold level is detected, transmission may commence and continue with the same emission bandwidth in the monitored time and spectrum windows without further monitoring. However, occupation of the same combined time and spectrum windows by a device or group of cooperating devices continuously over a period of time longer than 8 hours is not permitted without repeating the access criteria.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 clause 8.2.2

**Test result:**

Repetition of Access Criteria	Measured Maximum Transmission Time (Second)	Limit (Second)	Results
First	19600	28,800	Pass
Second	19600	28,800	Pass

**System Acknowledgement, FCC Part 15.323 (c) (4)**

Once access to specific combined time and spectrum windows is obtained an acknowledgment from a system participant must be received by the initiating transmitter within one second or transmission must cease. Periodic acknowledgments must be received at least every 30 seconds or transmission must cease. Channels used exclusively for control and signaling information may transmit continuously for 30 seconds without receiving an acknowledgment, at which time the access criteria must be repeated.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 clause 8.1.1, 8.2.1

**Test result:**

Test	Time taken (second)	Limit (second)	Result
Connection acknowledgement	0.1	1	Pass
Change of access criteria for control information	20.5	30	Pass
Transmission cease time	1.4	30	Pass
Pulse length	0.000460	0.01	Pass

### Least Interfered Channel (LIC) Selection, FCC Part 15.323 (c) (5)

If access to spectrum is not available as determined by the above, and a minimum of 40 duplex system access channels are defined for the system, the time and spectrum windows with the lowest power level below a monitoring threshold of 50 dB above the thermal noise power determined for the emission bandwidth may be accessed.

Calculation of monitoring threshold limits for isochroous devices:

Lower threshold:  $T_L = -174 + 10 \log_{10} B + M_u + P_{MAX} - P_{EUT}$  (dBm)

Upper threshold:  $T_U = -174 + 10 \log_{10} B + M_u + P_{MAX} - P_{EUT}$  (dBm)

Where: B=Emission bandwidth (Hz)

$M_u$  =dB the threshold may exceed thermal noise (30 for  $T_L$  & 50 for  $T_U$ )

$P_{MAX} = 5 \log_{10} B - 10$  (dBm)

$P_{EUT}$  =Transmitted power (dBm)

#### Limit:

Monitor Threshold	B (MHz)	M <sub>U</sub> (dB)	P <sub>MAX</sub> (dBm)	P <sub>EUT</sub> (dBm)	Threshold (dBm)
T <sub>L</sub>	1.368	30	20.68	19.50	-81.46
T <sub>U</sub>	1.368	50	20.68	19.50	-61.46

The EUT must not transmit until the interference level is less than or equal to:

Measured Threshold Level  $\leq T_U$

Where: T<sub>U</sub> =Upper threshold level

#### Test procedure:

Measurement method according to ANSI C63.17-2006 clause 7.3.2, 7.3.3, 7.3.4

#### Test result:

Monitor threshold (dBm)	Measured Threshold Level	Limit (dBm)
Lower Threshold	N/A	-81.46
Upper Threshold	-65.46	-61.46

Note: The upper threshold is applicable as the EUT utilizes more than 40 duplex system channels

### Random waiting FCC Part 15.323(c) (6)

If the selected combined time and spectrum windows are unavailable, the device may either monitor and select different windows or seek to use the same window after waiting an amount of time, randomly chosen from a uniform random distribution between 10 and 150 milliseconds, commencing when the channel becomes available.

#### Test procedure:

Measurement method according to ANSI C63.17-2006 clause 8.1.3

**Test result:**

The manufacturer declares that this provision is not utilized by the EUT.

**Monitoring Bandwidth, FCC Part 15.323 (c) (7)**

The monitoring system bandwidth must be equal to or greater than the emission bandwidth of the intended transmission and have a maximum reaction time less than  $50 \times \text{SQRT}(1.25/\text{emission bandwidth in MHz})$  microseconds for signals at the applicable threshold level but shall not be required to be less than 50 microseconds

**Test procedure:**

Measurement method according to ANSI C63.17-2006 clause 7.5

**Test result:**

Test Equation (μs)	B(bandwidth) (MHz)	Pulse width (μs)	Limit (μs)	Result
$50 (1.25/B)^{1/2}$	1.368	47.79	50	Pass
$35 (1.25/B)^{1/2}$	1.368	33.47	35	Pass

**Monitoring Antenna, FCC Part 15.323 (c) (8)**

The monitoring system shall use the same antenna used for transmission, or an antenna that yields equivalent reception at that location.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 paragraph 4

**Test result:**

The antenna of the EUT used for transmission is the same interior antenna that used for monitoring.

**Monitoring threshold relation FCC Part 15.323(c) (9)**

Devices that have a power output lower than the maximum permitted under the rules can increase their monitoring detection threshold by one decibel for each one decibel that the transmitter power is below the maximum permitted.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 paragraph 4

**Test result:**

Not apply based on §15.323 (c) (5)

**Duplex Connections, FCC Part 15.323 (c) (10)**

An initiating device may attempt to establish a duplex connection by monitors both its intended transmit and receive time and spectrum windows. If both the intended transmit and receive time and spectrum windows meet the access criteria, then the initiating device can initiate a transmission in the intended transmit time and spectrum window. If the power detected by the responding device can be decoded as a duplex connection signal from the initiating device, then the responding device may immediately begin transmitting on the receive time and spectrum window monitored by the initiating device.

**Test procedure:**

Measurement method according to ANSI C63.17 clause 8.3

**Test result:**

The manufacturer declares that this provision is not utilized by the EUT.

**Alternative monitoring interval for co-located devices, FCC Part 15.323 (c) (11)**

An initiating device that is prevented from monitoring during its intended transmit window due to monitoring system blocking from the transmissions of a co-located (within one meter) transmitter of the same system, may monitor the portions of the time and spectrum windows in which they intend to receive over a period of at least 10 milliseconds. The monitored time and spectrum window must total at least 50 percent of the 10 millisecond frame interval and the monitored spectrum must be within 1.25 MHz of the center frequency of channel(s) already occupied by that device or co-located co-operating devices. If the access criteria is met for the intended receive time and spectrum window under the above conditions, then transmission in the intended transmit window by the initiating device may commence.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 clause 8.4

**Test result:**

The manufacturer declares that this provision is not utilized by the EUT.

**Fair Access, FCC Part 15.323 (c) (12)**

The provisions of FCC Part 15.323(c)(10) or (c)(11) shall not be used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.

**Test result:**

The manufacturer declares that this device does not use any mechanisms as provided by Part 15.323 (c) (10) or (c) (11) to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other device.

**Frame Repetition Stability, Part 15 .323 (e)**

The frame period (a set of consecutive time slots in which the position of each time slot can be identified by reference to a synchronizing source) of an intentional radiator operating in these sub-bands shall be 20 milliseconds or 10 milliseconds/X where X is a positive whole number.

**Test procedure:**

Measurement method according to ANSI C63.17-2006 clause 6.2.2, 6.2.3

**Test result:**

Frame Repetition Stability:

Frame Repetition Stability (ppm)	Limit (ppm)	Result (Pass/Fail)
-0.94	10	Pass

Frame Period and Jitter:

Max. pos. Jitter (us)	Max. neg. Jitter (us)	Frame period (ms)	Limit	
			Frame Period (ms)	Jitter (μs)
0.03	-0.02	10.00000	20 or 10/X	25us

Note: X is a positive whole number.

**DECLARATION LETTER**

CETIS, INC.  
5025 GALLEY ROAD, COLORADO SPRINGS, CO 80915 USA  
Tel: 1-719 638 8821-888, Fax: 1-719 638 8815

**Product Similarity Declaration**

To Whom It May Concern,

We, CETIS, INC., hereby declare our product DECT iPhone with Model Numbers: NDC2110S-N, NDC2210S-N, NDC2105S-N, NDC2205S-N, that only Model number: NDC2110S-N is tested by BACL at this time. The key differences among them are the following:

First, the only difference between NDC2110S-N and NDC2210S-N is the model name. The difference between NDC2105S-N and NDC2205S-N is also the model name.

Second, the differences between NDC2110S-N and NDC2105S-N are appearance and the function key for the base part. The former has more five function keys than the latter. But, both have the same handset.

All of them have the same circuit designs, RF modules, and the PCB boards.

Please contact me if you have any question.

Signature:

A handwritten signature in black ink, appearing to read "Sun".

Bing N. Sun / President & CEO

Date: 2011-8-1

\*\*\*\*\* END OF REPORT \*\*\*\*\*