



| <b>FCC TEST REPORT</b><br><b>FCC 47 CFR Part 15C</b><br><b>Industry Canada RSS-210</b><br><b>Operation within the 13.110 – 14.010 MHz band</b> |  |
|--|--|
| <b>Report Reference No.</b> .....  | G0M-1603-5477-TFC225RI-V01   |
| <b>Testing Laboratory</b> .....  | Eurofins Product Service GmbH  |
| <b>Address</b> .....   | Storkower Str. 38c<br>15526 Reichenwalde<br>Germany  |
| <b>Accreditation</b> .....   |  <br>A2LA Accredited Testing Laboratory, Certificate No.: 1983.01<br>FCC Filed Test Laboratory, Reg.-No.: 96970<br>IC OATS Filing assigned code: 3470A |
| <b>Applicant's name</b> .....  | Owlet GmbH   |
| <b>Address</b> .....   | Mosbacher Str. 9<br>65187 Wiesbaden<br>GERMANY   |
| <b>Test specification:</b>   |  |
| <b>Standard</b> .....  | 47 CFR Part 15C<br>RSS-210, Issue 8, 2010-12   |
| <b>Test scope</b> .....  | complete Radio compliance test   |
| <b>Equipment under test (EUT):</b>   |  |
| Product description  | Luminaire Controller   |
| Model No.  | LUCO P7 CM   |
| Additional Model(s)  | None   |
| Brand Name(s)  | Owlet IoT  |
| Hardware version   | 3A-2213-2100-7238-1111   |
| Firmware / Software version  | 3.12.10.17   |
|  | FCC-ID: 2AIOB-LCP7CM      IC: 21585-LCP7CM   |
| <b>Test result</b>   | <b>Passed</b>  |

**Possible test case verdicts:**

- neither assessed nor tested ..... : N/N
- required by standard but not appl. to test object ..... : N/A
- required by standard but not tested ..... : N/T
- not required by standard for the test object ..... : N/R
- test object does meet the requirement ..... : P (Pass)
- test object does not meet the requirement ..... : F (Fail)

**Testing:**

Test Lab Temperature ..... : 20 – 23 °C

Test Lab Humidity ..... : 32 – 38 %

Date of receipt of test item ..... : 2016-08-03

Date (s) of performance of tests ..... : 2016-11-25

Compiled by ..... : Christian Weber

Tested by (+ signature) ..... : Wilfried Treffke  
(Responsible for Test)

Approved by (+ signature) ..... : Christian Weber  
(Head of Lab)

Date of issue ..... : 2016-11-25

Total number of pages ..... : 27

*W. Treffke*

*C. Weber*

**General remarks:**

**The test results presented in this report relate only to the object tested.**

**The results contained in this report reflect the results for this particular model and serial number. It is the responsibility of the manufacturer to ensure that all production models meet the intent of the requirements detailed within this report.**

This report shall not be reproduced, except in full, without the written approval of the Issuing testing laboratory.

**Additional comments:**

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## Version History

| Version | Issue Date | Remarks         | Revised by |
|---------|------------|-----------------|------------|
| 01      | 2016-11-25 | Initial Release |            |

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## REPORT INDEX

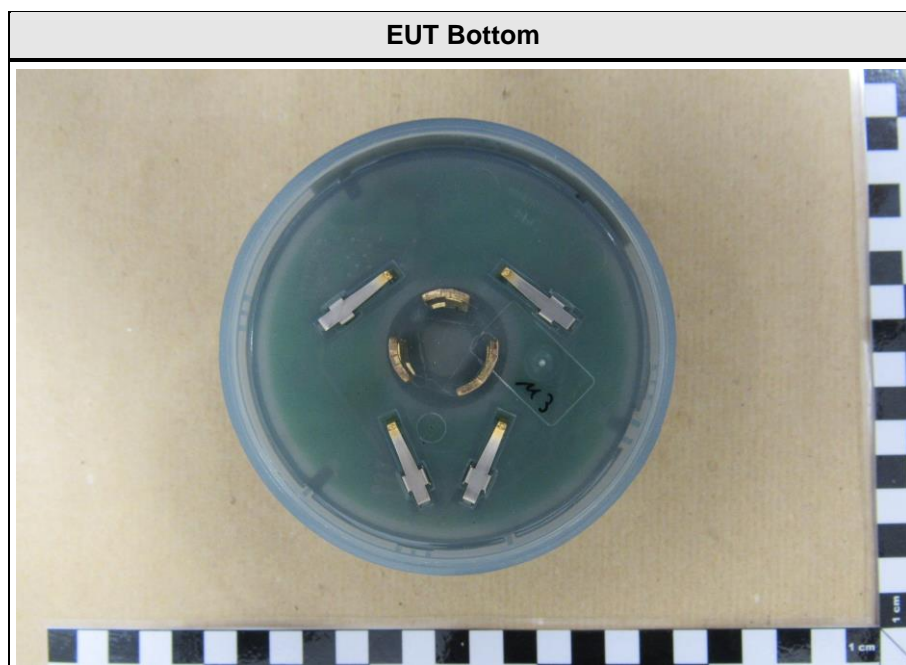
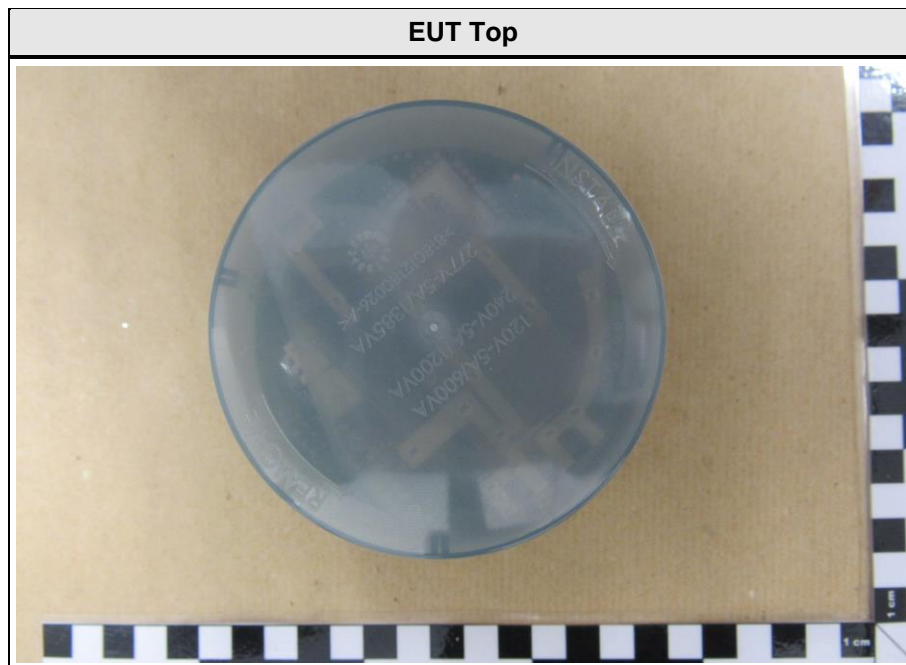
|          |   |           |
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## 1 Equipment (Test item) Description:

|                             |  |                      |
|-----------------------------|--|----------------------|
| Description                 | Luminaire Controller   |                      |
| Model                       | LUCO P7 CM   |                      |
| Additional Model(s)         | None   |                      |
| Brand Name(s)               | Owlet IoT  |                      |
| Serial number               | None   |                      |
| Hardware version            | 3A-2213-2100-7238-1111                                       |                      |
| Software / Firmware version | 3.12.10.17   |                      |
| PMN                         | N/A  |                      |
| HVIN                        | LUCO P7 CM   |                      |
| FVIN                        | N/A  |                      |
| HMN                         | N/A  |                      |
| FCC-ID                      | 2AIOB-LCP7CM   |                      |
| IC                          | 21585-LCP7CM   |                      |
| Equipment type              | End product  |                      |
| Radio type                  | Transceiver  |                      |
| Radio technology            | 13.56 MHz RFID   |                      |
| Operating frequency range   | 13.56 MHz  |                      |
| Assigned frequency band     | 13.110 - 14.010 MHz  |                      |
| Frequency range             | F <sub>MID</sub>   | 13.56 MHz            |
| Spreading                   | None   |                      |
| Modulations                 | ASK  |                      |
| Number of channels          | 1  |                      |
| Channel spacing             | None   |                      |
| Number of antennas          | 1  |                      |
| Antenna                     | Type   | integrated           |
|                             | Model  | printed loop antenna |
|                             | Manufacturer   | metraTec             |
| Manufacturer                | Owlet GmbH<br>Mosbacher Str. 9<br>65187 Wiesbaden<br>GERMANY |                      |
| Power supply                | V <sub>NOM</sub>   | 120.0 VAC            |
|                             | V <sub>MIN</sub>   | 102 VAC              |
|                             | V <sub>MAX</sub>   | 138 VAC              |
| Temperatures                | T <sub>NOM</sub>   | 25°C                 |
|                             | T <sub>MIN</sub>   | -10°C                |
|                             | T <sub>MAX</sub>   | 80°C                 |

|               |        |     |
|---------------|--------|-----|
| AC/DC-Adaptor | Model  | N/A |
|               | Vendor | N/A |
|               | Input  | N/A |
|               | Output | N/A |

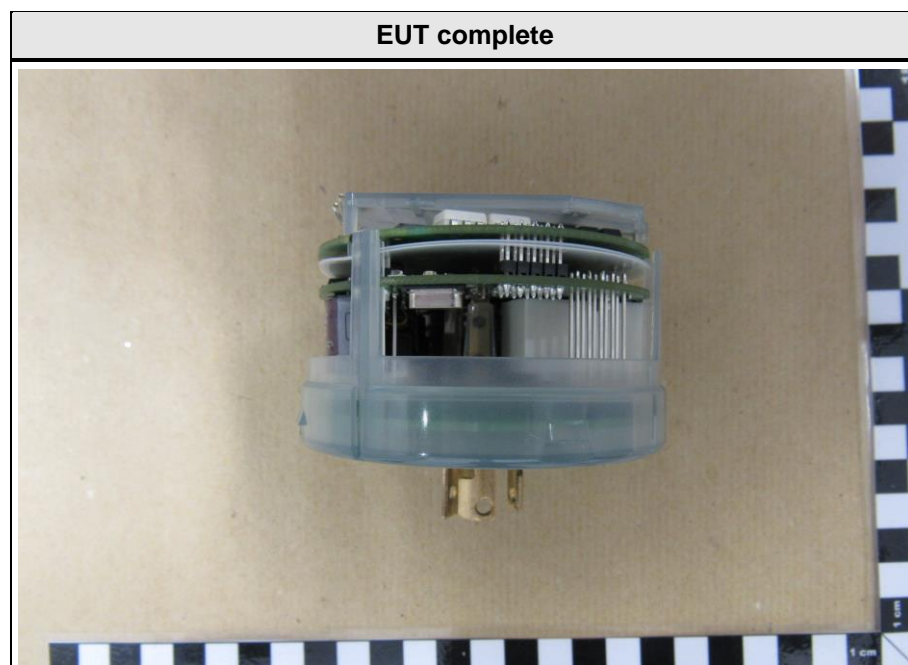
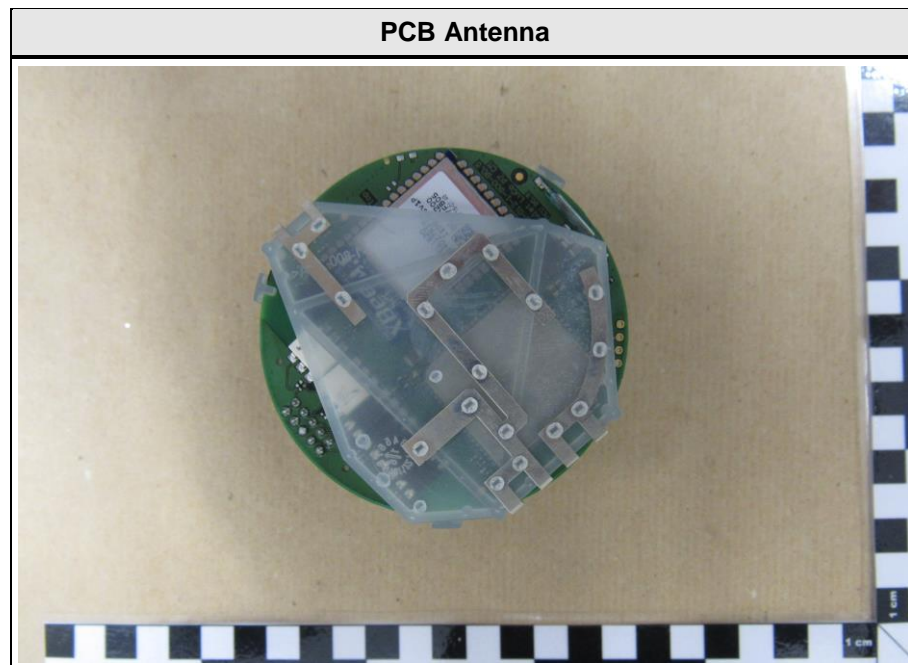
## 1.1 Photos – Equipment External







## 1.2 Photos – Equipment internal



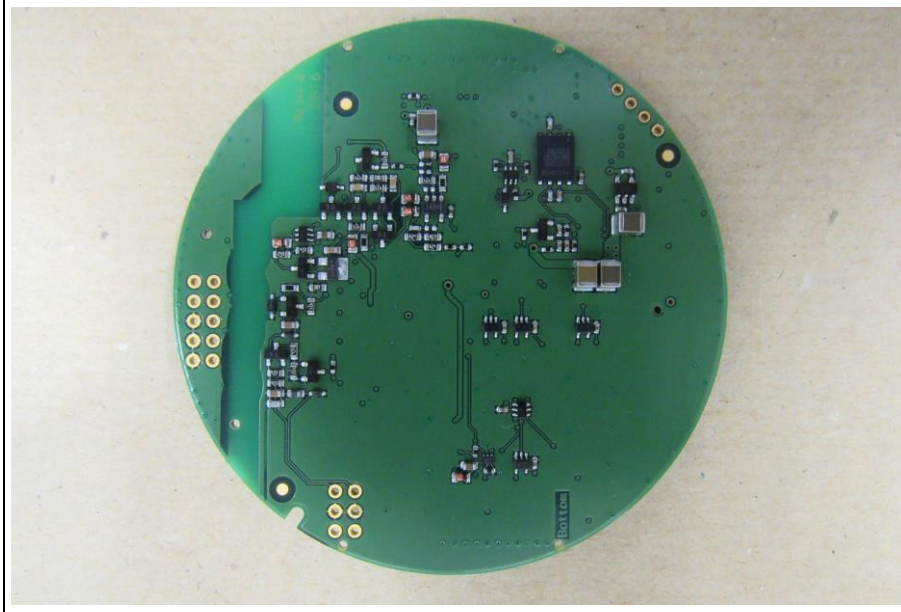
Radio PCB Top



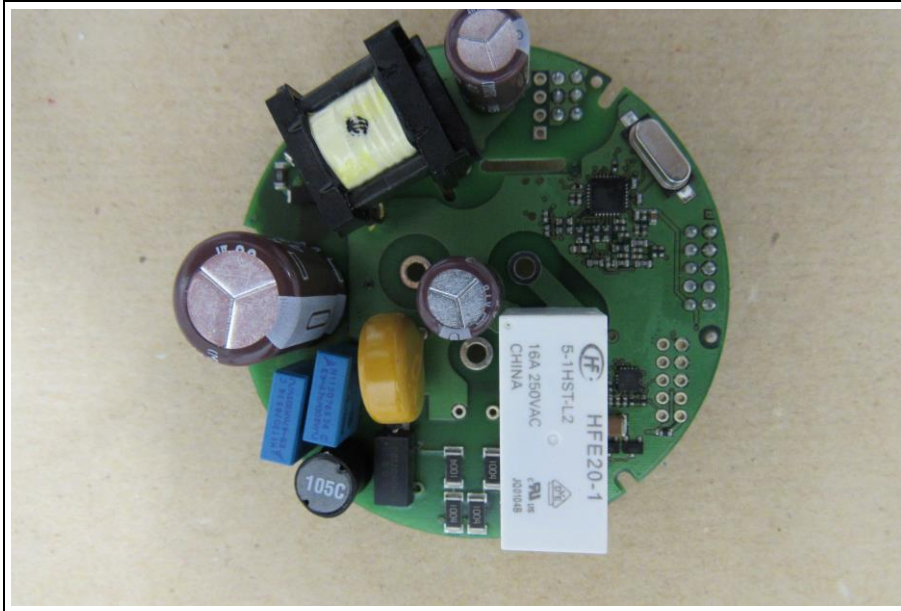
ZigBee Module



Radio PCB Bottom

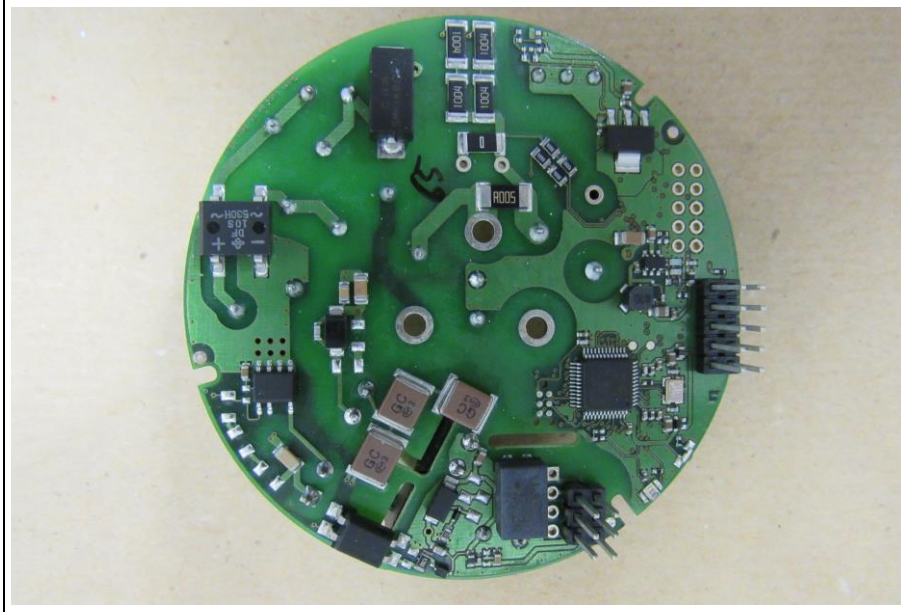


HV PCB Top





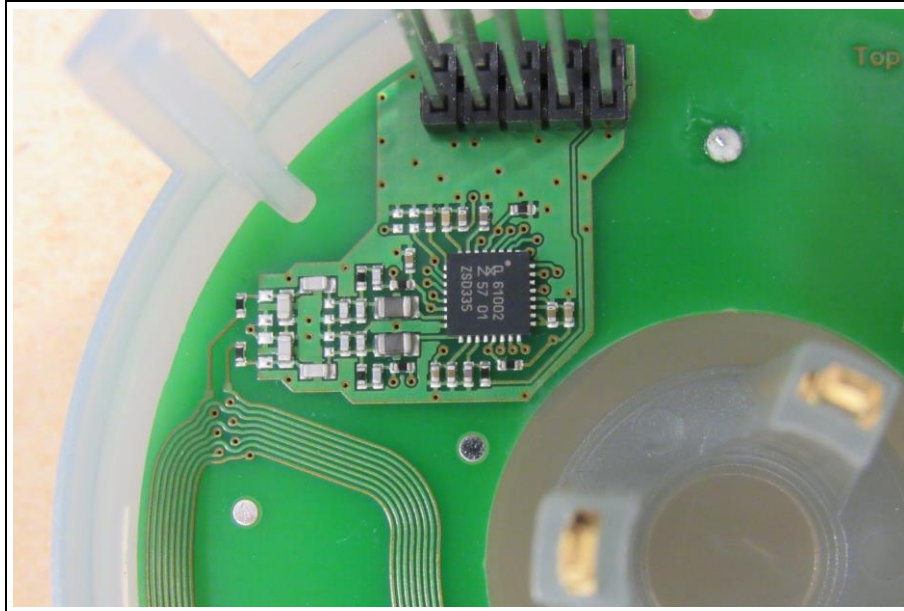
**HV PCB Bottom**



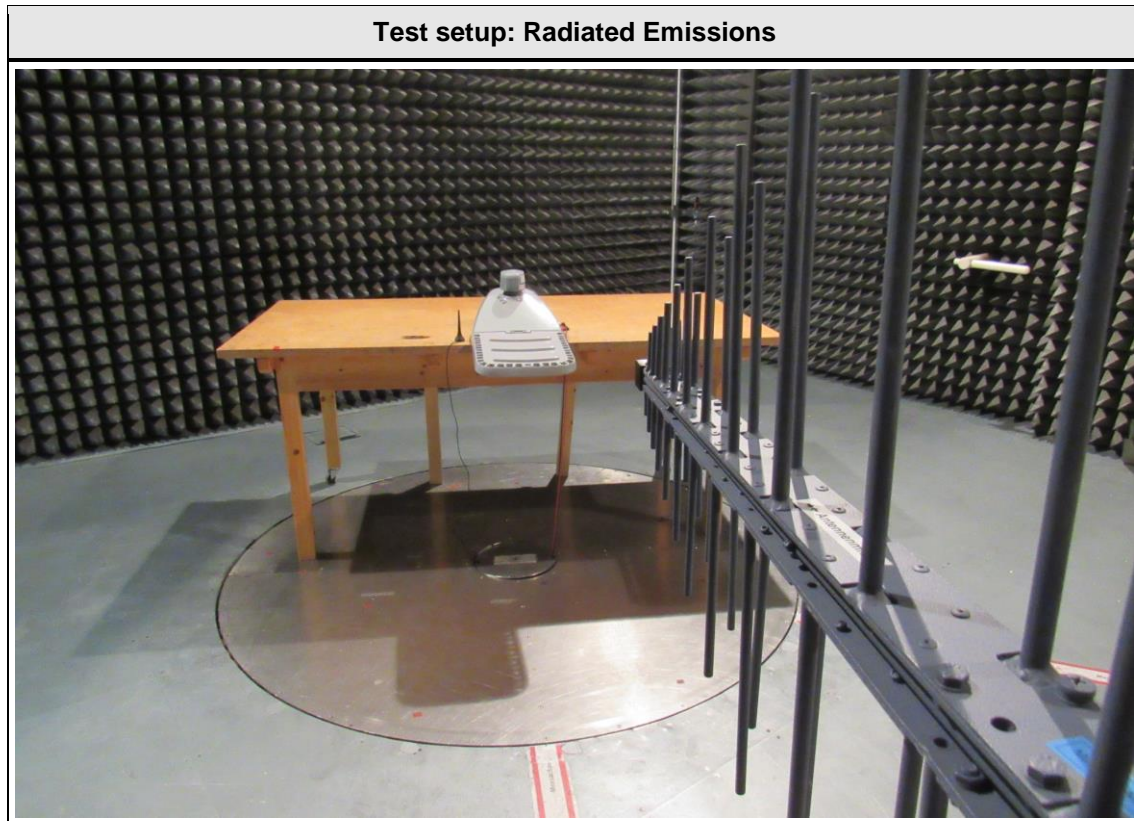
**Connector Side**



Connector Side in detail



### 1.3 Photos – Test setup



#### 1.4 Supporting Equipment Used During Testing

| Product Type*   | Device | Manufacturer | Model No. | Comments |
|---|--------|--------------|-----------|----------|
| None  |        |              |           |          |
| <p><b>*Note:</b> Use the following abbreviations:</p> <p>AE : Auxiliary/Associated Equipment, or</p> <p>SIM : Simulator (Not Subjected to Test)</p> <p>CABL : Connecting cables</p> |        |              |           |          |

## 1.5 Test Modes

| Mode # | Description         |   |
|--------|---------------------|---|
| Single | General conditions: | EUT powered by ac-mains   |
|        | Radio conditions:   | Mode = standalone transmit<br>Modulation = ASK<br>Power level = Maximum |



## 1.6 Test Equipment Used During Testing

| Measurement Software |                  |            |          |
|----------------------|------------------|------------|----------|
| Description          | Manufacturer     | Name       | Version  |
| EMC Test Software    | Dare Instruments | Radimation | 2015.2.4 |

| Occupied Bandwidth |              |        |            |           |          |
|--------------------|--------------|--------|------------|-----------|----------|
| Description        | Manufacturer | Model  | Identifier | Cal. Date | Cal. Due |
| Spectrum Analyzer  | R&S          | FSP 30 | EF00312    | 2016-02   | 2017-02  |

| Field strength emissions |              |         |            |           |          |
|--------------------------|--------------|---------|------------|-----------|----------|
| Description              | Manufacturer | Model   | Identifier | Cal. Date | Cal. Due |
| Semi-anechoic chamber    | Frankonia    | AC 1    | EF00062    | -         | -        |
| Spectrum Analyzer        | R&S          | FSIQ26  | EF00242    | 2016-04   | 2017-04  |
| Loop Antenna             | R&S          | HFH2-Z2 | EF00184    | 2014-11   | 2016-11  |
| Biconical Antenna        | R&S          | HK 116  | EF00012    | 2016-05   | 2019-05  |
| LPD Antenna              | R&S          | HL 223  | EF00187    | 2016-05   | 2019-05  |
| LPD Antenna              | R&S          | HL 025  | EF00327    | 2015-10   | 2018-10  |

## 1.7 Sample emission level calculation

The following is a description of terms and a sample calculation, as appears in the radiated emissions data table. The numbers used in the calculation are for example only. There is no direct correlation to the specific data taken for the product described in this document:

Reading:

This is the reading obtained on the spectrum analyzer in dB $\mu$ V. Any external preamplifiers used are taken into account through internal analyzer settings.

A.F.:

This is the antenna factor for the receiving antenna. It is a conversion factor, which converts electric fields strengths to voltages, which can be measured directly on the spectrum analyzer. It is treated as a loss in dB. Cable losses have been included with the A.F. to simplify the calculations. The antenna factor is used in calculations as follows:

$$\text{Reading on Analyzer (dB}\mu\text{V)} + \text{A.F. (dB)} = \text{Net field strength (dB}\mu\text{V/m)}$$

Net:

This is the net field strength measurement (as shown above).

Limit:

This is the FCC Class B radiated emission limit (in units of dB $\mu$ V/m). The FCC limits are given in units of  $\mu$ V/m. The following formula is used to convert the units of  $\mu$ V/m to dB $\mu$ V/m:

$$\text{Limit (dB}\mu\text{V/m)} = 20 \cdot \log (\mu\text{V/m})$$

Margin:

This is the margin of compliance below the FCC limit. The units are given in dB. A negative margin indicates the emission was below the limit. A positive margin indicates that the emission exceeds the limit.

Example only:

$$\begin{array}{rclcl} \text{Reading} & + & \text{AF} & = & \text{Net Reading} & : & \text{Net reading - FCC limit} & = & \text{Margin} \\ 21.5 \text{ dB}\mu\text{V} & + & 26 \text{ dB} & = & 47.5 \text{ dB}\mu\text{V/m} & : & 47.5 \text{ dB}\mu\text{V/m} - 57.0 \text{ dB}\mu\text{V/m} & = & -9.5 \text{ dB} \end{array}$$

## 2 Result Summary

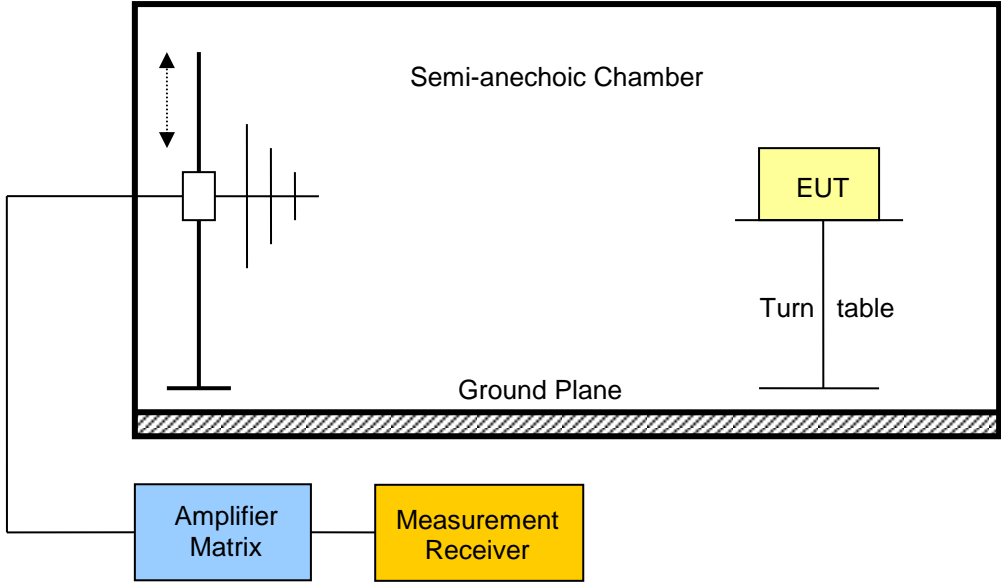
| FCC 47 CFR Part 15C, IC RSS-210   |  |                  |        |                    |
|---|--|------------------|--------|--------------------|
| Product Specific Standard Section   | Requirement – Test                                     | Reference Method | Result | Remarks            |
| RSS-Gen 6.6   | Occupied Bandwidth                                     | RSS-Gen 6.6      | N/R    | Informational only |
| FCC 15.225(a-c)<br>IC RSS-210 A2.6(a-c)   | Fundamental in-band field strength emissions           | ANSI C63.4       | PASS   |                    |
| FCC 15.225(d)<br>FCC 15.209<br>IC RSS-210 A2.6(d)   | Emission radiated outside the specified frequency band | ANSI C63.4       | PASS   |                    |
| FCC 15.225(e)<br>IC RSS-210 A2.6  | Frequency stability                                    | ANSI C63.4       | PASS   | Note 1             |
| IC RSS-Gen 4.10<br>IC RSS-Gen 7.1   | Receiver radiated spurious emissions                   | ANSI C 63.4      | N/A    |                    |
| 47 CFR 15.207<br>RSS-Gen 8.8  | AC power line conducted emissions                      | ANSI C63.4       | PASS   |                    |
| <b>Remarks:</b><br>Note 1: Fundamental emission far below spurious emission limit. Measurement has been omitted |  |                  |        |                    |

### 3 Test Conditions and Results

#### 3.1 Test Conditions and Results – Occupied Bandwidth

| Occupied Bandwidth acc. to IC RSS-Gen   |                    |                          | Verdict: PASS |
|---|--------------------|--------------------------|---------------|
| Test according to measurement reference   | Reference Method   |                          |               |
|   | RSS-Gen 6.6        |                          |               |
| Test frequency range  | Tested frequencies |                          |               |
|   | F <sub>MID</sub>   |                          |               |
| EUT test mode   | Single             |                          |               |
| Limits  |                    |                          |               |
| None (Informational only)   |                    |                          |               |
| Test setup  |                    |                          |               |
| <div><div>Spectrum Analyzer</div><div>EUT</div></div>   |                    |                          |               |
| Test procedure  |                    |                          |               |
| <div>1. EUT set to test mode (Communication tester is used if needed)</div> <div>2. Span set to at least twice the emission spectrum</div> <div>3. Resolution bandwidth set to 1 % of span</div> <div>4. Occupied Bandwidth (99 %) measurement with spectrum analyzer built in measurement function</div> |                    |                          |               |
| Test results  |                    |                          |               |
| Channel   | Frequency [MHz]    | Occupied Bandwidth [kHz] |               |
| F <sub>MID</sub>  | 13.56              | 86.53                    |               |
| Comments: Measurement is applicable to all variants   |                    |                          |               |

### 3.2 Test Conditions and Results – Fundamental in-band field strength emissions

| Field strength emissions acc. to FCC 47 CFR 15.225 / IC RSS-210  |  |                | Verdict: PASS      |
|--|--|----------------|--------------------|
| Test according referenced standards  | Reference Method                       |                |                    |
|  | FCC 15.225(a-c) / IC RSS-210 A2.6(a-c) |                |                    |
| Test according to measurement reference  | Reference Method                       |                |                    |
|  | ANSI C63.4                             |                |                    |
| Test frequency range   | Tested frequencies                     |                |                    |
|  | F <sub>MID</sub>                       |                |                    |
| EUT test mode  | Single                                 |                |                    |
| Limits   |  |                |                    |
| Frequency range [MHz]  | Limit [μV/m]                           | Limit [dBμV/m] | Limit Distance [m] |
| 13.553 – 13.567  | 15848                                  | 84             | 30                 |
| 13.410 – 13.553<br>13.567 – 13.710   | 334                                    | 50.5           | 30                 |
| 13.110 – 13.410<br>13.710 – 14.010   | 106                                    | 40.5           | 30                 |
| Test setup   |  |                |                    |
|    |  |                |                    |
| Test procedure   |  |                |                    |
| <div>1. EUT set to test mode</div> <div>2. Span it set according to measurement range</div> <div>3. Resolution bandwidth below 1 GHz is set according to CISPR 16 with peak/quasi-peak detector</div> <div>4. Below 30MHz and extrapolation factor of 40dB/decade is used and at 30MHz and above an extrapolation factor of 20dB/decade is used (47 CRF 15.31(f)).</div> |  |                |                    |

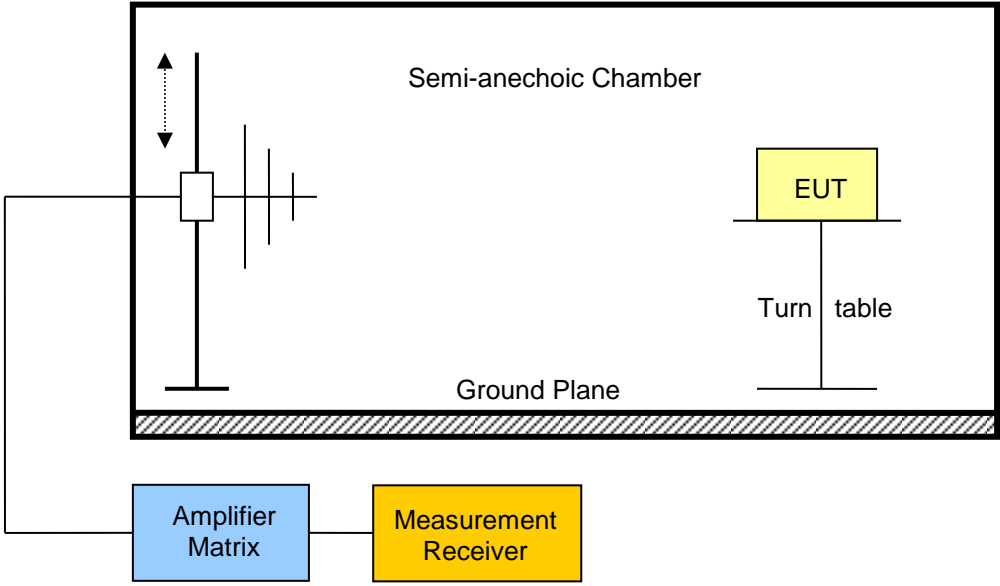
Test Report No.: G0M-1603-5477-TFC225RI-V01

Eurofins Product Service GmbH  
Storkower Str. 38c, D-15526 Reichenwalde, Germany

| Test results   |                 |                |                      |      |                      |                     |             |
|--|-----------------|----------------|----------------------|------|----------------------|---------------------|-------------|
| Channel  | Frequency [MHz] | Emission [MHz] | Level @ 30m [dBμV/m] | Det. | Limit @ 30m [dBμV/m] | Limit distance [m]* | Margin [dB] |
| F <sub>MID</sub>   | 13.56           | 13.562         | 14.4                 | pk   | 84                   | 30                  | -69.60      |
| Comments: * Physical distance between EUT and measurement antenna. See Annex |                 |                |                      |      |                      |                     |             |

### 3.3 Test Conditions and Results – Emissions radiated outside the specified frequency band

| Radiated out-of-band band emissions acc. to<br>FCC 47 CFR 15.225 / IC RSS-210  |            |                                    |                | Verdict: PASS      |
|--|------------|------------------------------------|----------------|--------------------|
| Test according referenced standards  |            | Reference Method                   |                |                    |
|  |            | FCC 15.225(d) / IC RSS-210 A2.6(d) |                |                    |
| Test according to measurement reference  |            | Reference Method                   |                |                    |
|  |            | ANSI C63.4                         |                |                    |
| Test frequency range   |            | Tested frequencies                 |                |                    |
|  |            | 9 kHz – 216 MHz                    |                |                    |
| EUT test mode  |            | Single                             |                |                    |
| Limits   |            |                                    |                |                    |
| Frequency range [MHz]  | Detector   | Limit [μV/m]                       | Limit [dBμV/m] | Limit Distance [m] |
| 0.009 – 0.490  | Quasi-Peak | 2400/F[kHz]                        | 48.5 – 13.8    | 300                |
| 0.490 – 1.705  | Quasi-Peak | 2400/F[kHz]                        | 13.8 – 2.97    | 30                 |
| 1.705 – 30   | Quasi-Peak | 30                                 | 29.5           | 30                 |
| 30 – 88  | Quasi-Peak | 100                                | 40             | 3                  |
| 88 – 216   | Quasi-Peak | 150                                | 43.5           | 3                  |
| The emission limits shown in the above table are based on measurements employing a CISPR quasi-peak detector except for the frequency bands 9–90 kHz, 110–490 kHz and above 1000 MHz. Radiated emission limits in these three bands are based on measurements employing an average detector. |            |                                    |                |                    |

| Test setup  |                 |                |                      |          |                           |                     |             |
|---|-----------------|----------------|----------------------|----------|---------------------------|---------------------|-------------|
|   |                 |                |                      |          |                           |                     |             |
| Test procedure  |                 |                |                      |          |                           |                     |             |
| <ol style="list-style-type: none"> <li>1. EUT set to test mode</li> <li>2. Span it set according to measurement range</li> <li>3. Resolution bandwidth below 1 GHz is set according to CISPR 16 with peak/quasi-peak detector and RBW of 1 MHz with peak/average detector is used above 1 GHz</li> <li>4. Markers are set to maximum emission levels</li> </ol> |                 |                |                      |          |                           |                     |             |
| Test results  |                 |                |                      |          |                           |                     |             |
| Channel   | Frequency [MHz] | Emission [MHz] | Level [db $\mu$ V/m] | Detector | Pol. Limit [db $\mu$ V/m] | Limit distance [m]* | Margin [dB] |
| F <sub>MID</sub>  | 13.56           | 27.11          | -14.1                | pk       | 29.5                      | 30                  | -43.60      |
| Comments: * Physical distance between EUT and measurement antenna.  |                 |                |                      |          |                           |                     |             |



### 3.4 Test Conditions and Results – AC power line conducted emissions

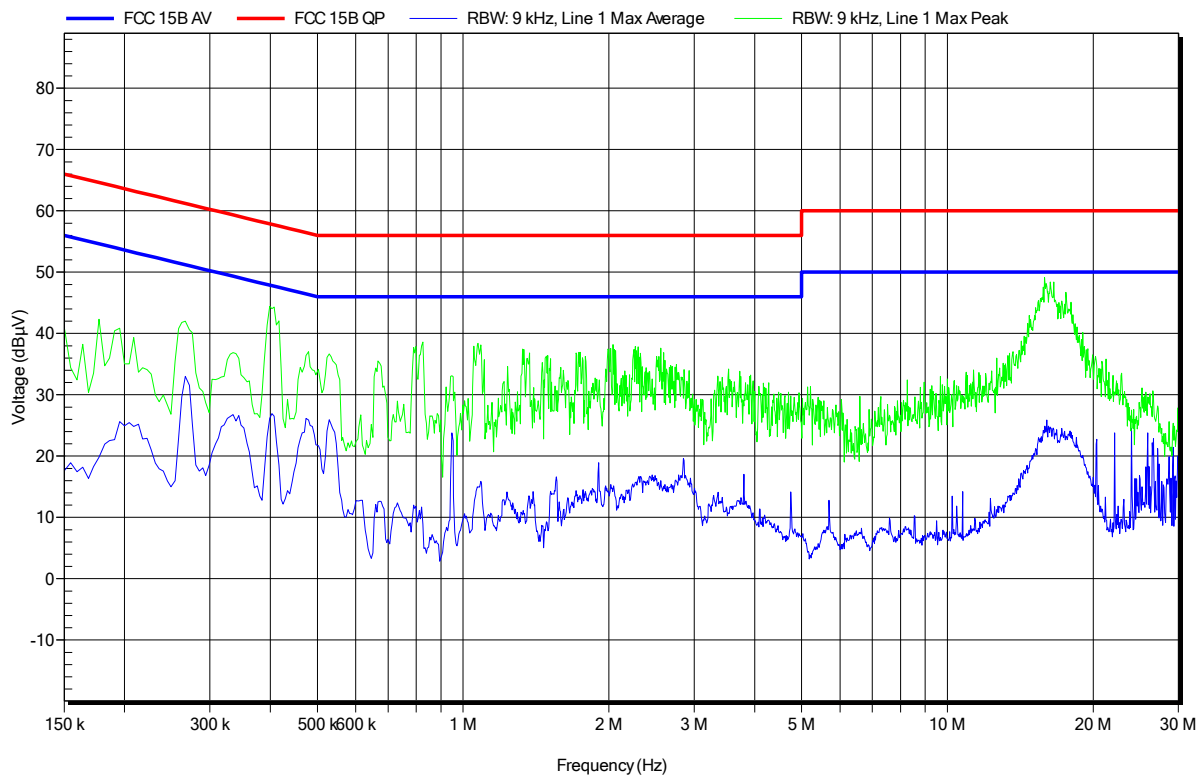
| Power line conducted emissions acc. to<br>FCC 47 CFR 15.207 / IC RSS-Gen |                   |                       |                | Verdict: PASS |  |
|--|-------------------|-----------------------|----------------|---------------|--|
| Test according referenced standards                                      |                   | Reference Method      |                |               |  |
|  |                   | ANSI C63.4            |                |               |  |
| Fully configured sample scanned over the following frequency range       |                   | Frequency range       |                |               |  |
|  |                   | 0.15 MHz to 30 MHz    |                |               |  |
| Points of Application  |                   | Application Interface |                |               |  |
| AC Mains   |                   | LISN                  |                |               |  |
| EUT test mode  |                   | AC-Powerline          |                |               |  |
| Limits and results   |                   |                       |                |               |  |
| Frequency [MHz]  | Quasi-Peak [dBµV] | Result                | Average [dBµV] | Result        |  |
| 0.15 to 5  | 66 to 56*         | PASS                  | 56 to 46*      | PASS          |  |
| 0.5 to 5   | 56                | PASS                  | 46             | PASS          |  |
| 5 to 30  | 60                | PASS                  | 50             | PASS          |  |
| Comments:  |                   |                       |                |               |  |
| * Limit decreases linearly with the logarithm of the frequency.          |                   |                       |                |               |  |

**Conducted Emissions 1**
**EMI voltage test in the ac-mains according to FCC 47 CFR 15.107 / ICES-003**

Project number: G0M-1603-5477

Applicant: Owlet GmbH  
 EUT Name: Luminaire Controller  
 Model: LUCO P7 CM  
 Test Site: Eurofins Product Service GmbH  
 Operator: Mr. Yu  
 Test Conditions: Tnom: 23.4°C, Unom: 120V AC  
 LISN: ESH2-Z5 L  
 Mode: 1  
 Test Date: 2016-08-12  
 Note:

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## Conducted Emissions 2

### EMI voltage test in the ac-mains according to FCC 47 CFR 15.107 / ICES-003

Project number: G0M-1603-5477

Applicant: Owlet GmbH  
 EUT Name: Luminaire Controller  
 Model: LUCO P7 CM  
 Test Site: Eurofins Product Service GmbH  
 Operator: Mr. Yu  
 Test Conditions: Tnom: 23.4°C, Unom: 120V AC  
 LISN: ESH2-Z5 N  
 Mode: 1  
 Test Date: 2016-08-12  
 Note:

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