



FCC PART 15, SUBPART C TEST REPORT

For

Sierra Innotek, Inc.

4391 Cameron Road, Cameron Park, CA 95682, USA

FCC ID: 2AIQA-CMVAD100

Report Type:

Original Report

Product Type:

Law Enforcement Body Wire Transmitter

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Report Number: R1810113-247

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^{*} This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "*"

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DOCUMENT REVISION HISTORY

| Revision Number | Report Number | Description of Revision | Date of Revision |
|-----------------|---------------|-------------------------|------------------|
| 0 R1810113-247 | | Original Report | 2018-11-06 |

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Sierra Innotek*, *Inc.*, and their product model: *C-CAT Mini*, FCC ID: 2AIQA-CMVAD100 or the "EUT" as referred to in this report. The product is a Law Enforcement Body Wire Transmitter.

1.2 Mechanical Description of EUT

The C-CAT Mini (EUT) measures approximately 4 cm (L) x 2.3 cm (W) x 0.8 cm (H) and weighs approximately 0.012 kg.

1.3 Objective

This report is prepared on behalf of *Sierra Innotek, Inc.*, in accordance with Part 2, Subpart J, and Part 15, Subparts C of the Federal Communication Commission's rules.

The objective is to determine compliance with FCC Part 15.247 rules for Output Power, Antenna Requirements, 6 dB and 99% Occupied Bandwidth, Power Spectral Density, 100 kHz Bandwidth of Band Edges Measurement, Conducted and Radiated Spurious Emissions.

1.4 Related Submittal(s)/Grant(s)

FCC Part 90.217, equipment class TNT with FCC ID: 2AIQA-CMVAD100

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 15.247 Meas Guidance v05: Guidance for Compliance Measurements on Digital Transmission System, Frequency Hopping Spread Spectrum System, and Hybrid System Devices Operating Under Section 15.247 of the FCC Rules.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the 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.

| Parameter | Measurement uncertainty |
|-----------------------------------|-------------------------|
| Occupied Channel Bandwidth | ±5 % |
| RF output power, conducted | ±0.57 dB |
| Power Spectral Density, conducted | ±1.48dB |
| Unwanted Emissions, conducted | ±1.57dB |
| All emissions, radiated | ±4.0 dB |
| AC power line Conducted Emission | ±2.0 dB |
| Temperature | ±2 ° C |
| Humidity | ±5 % |
| DC and low frequency voltages | ±1.0 % |
| Time | ±2 % |
| Duty Cycle | ±3 % |

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.8 Test Facility Accreditations

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Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3279.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment

[including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices, Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.03) to certify

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:

3

- 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 Terminal Equipment for the Purpose of Calls;
 - All Scope A2 Other Terminal Equipment
- 2 Radio Law (Radio Equipment):
 - All Scope B1 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3279.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)

- for Imaging Equipment (ver. 2.0)
- for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment
 - for Commercial Dishwashers (ver. 2.0)
 - for Commercial Ice Machines (ver. 2.0)
 - for Commercial Ovens (ver. 2.1)
 - for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
- For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada ISEDC) Foreign Certification Body FCB APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority OFTA)
 APEC Tel MRA -Phase I & Phase II
- Israel US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:

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- o ENERGY STAR Recognized Test Laboratory US EPA
- o Telecommunications Certification Body (TCB) US FCC;
- o Nationally Recognized Test Laboratory (NRTL) US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 15.247 Meas Guidance v05.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

No test firmware was used.

| Modulation | Frequency (MHz) | Power Setting |
|------------|--------------------|---------------|
| | 2402 | Default |
| BLE | 2440 | Default |
| | 2480 | Default |

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 15.247 Meas Guidance v05 section 6:

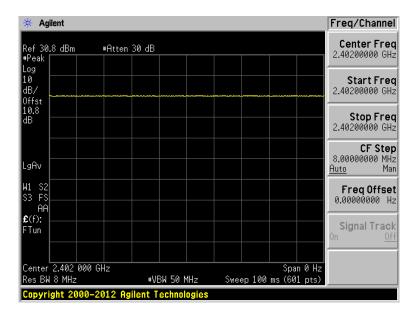
Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98 %). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

| Radio Mode | On Time (ms) | Period (ms) Duty Cycle (%) | Duty Cycle Correction Factor (dB) | |
|------------|--------------|----------------------------|---|---|
| BLE | - | - | 100 | 0 |

Duty Cycle = On Time (ms)/ Period (ms)

Duty Cycle Correction Factor (dB) = 10*log(1/Duty Cycle)

Please refer to the following plots.



2.4 Equipment Modifications

To prepare the conducted sample, the internal SMD 2.4GHz antenna has been removed and SMA connector has been added.

2.5 Local Support Equipment

| Manufacturer | Description | Model | |
|--------------|-------------|----------------|--|
| Dell | Laptop | Latitude E6410 | |

2.6 Support Equipment

N/A

2.7 Interface Ports and Cabling

| Cable Description | Length (m) | То | From |
|-------------------|------------|-----|------------------|
| USB power | 0.3 | EUT | USB Type A power |

3 Summary of Test Results

Results reported relate only to the product tested.

| FCC Rules | Description of Test | Results | |
|----------------------|--|-----------|--|
| §15.203 | §15.203 Antenna Requirement | | |
| §15.107 and §15.207 | AC Line Conducted Emissions | Compliant | |
| §2.1093, §15.247(i) | RF Exposure | Compliant | |
| §2.1051, §15.247 (d) | 2.1051, §15.247 (d) Spurious Emissions at Antenna Port | | |
| §15.209, §15.247 (d) | §15.209, §15.247 (d) Radiated Spurious Emissions | | |
| §15.247(a)(2) | §15.247(a)(2) 6 dB and 99% Emission Bandwidth | | |
| §15.247(b)(3) | §15.247(b)(3) Maximum Peak Output Power | | |
| §15.247(d) | 100 kHz Bandwidth of Frequency Band Edge | Compliant | |
| §15.247(e) | §15.247(e) Power Spectral Density | | |

4 FCC §15.203 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

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. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

4.2 Antenna Description

The antenna connector types used by the EUT are MMCX for VHF.

| Frequency Range (MHz) | External/Internal/Integral | Maximum Antenna Gain (dBi) | Antenna Type / Pattern |
|--------------------------|----------------------------|-------------------------------|------------------------|
| 136-174 | External | 2.15 | 1/4 Wave wire/toroid |
| 2402-2480 | Internal | -2 | SMD part/spherical |

5 FCC §2.1093 & §15.247(i) - RF Exposure

5.1 Applicable Standards

According to FCC KDB 447498 D01 General RF Exposure Guidance v05r02 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

1) The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

[(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $\cdot [\sqrt{f(GHz)}] \le 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR, where

- f(GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is ≤ 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:
 - a) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance 50 mm)·(f(MHz)/150)] mW, at 100 MHz to 1500 MHz
 - b) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance 50 mm) \cdot 10] mW at > 1500 MHz and \leq 6 GHz
- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:
 - a) The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(MHz))]$ for test separation distances > 50 mm and < 200 mm
 - b) The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances \leq 50 mm

c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

5.2 RF Exposure Evaluation Results

The highest measured conducted power as reported in Section 9.5 of this report was 10.64 dBm (12 mW) at 2402 MHz.

For FCC, based on the [(max. power of channel, including tune-up tolerance, mW)/(min. test separation distance, mm)] $\cdot [\sqrt{f(GHz)}] \le 3.0$ for 1-g SAR and ≤ 7.5 for 10-g extremity SAR

 $(12 \text{ mW/5 mm})^* \sqrt{2.402} = 3.8 \text{ which is less than 7.5.}$

Conclusion:

The BLE radio is active normally when the device is on a table or held by hand. For the worst case consideration, 10-g extremity SAR exclusion was used. Thus, SAR was exempted for this device.

6 FCC §15.107 & §15.207 - AC Line Conducted Emissions

6.1 Applicable Standards

s per FCC §15.207 Conducted limits:

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

| Frequency of Emission | Conducted Limit (dBuV) | | |
|-----------------------|------------------------|----------------|--|
| (MHz) | Quasi-Peak | Average | |
| 0.15-0.5 | 66 to 56 Note1 | 56 to 46 Note2 | |
| 0.5-5 | 56 | 46 | |
| 5-30 | 60 | 50 | |

Note1: Decreases with the logarithm of the frequency.

Note2: A linear average detector is required

6.2 Test Setup

The measurement was performed at shield room, using the setup per ANSI C63.10-2013 measurement procedure. The specification used were FCC §15.107 and §15.207 limits.

External I/O cables were draped along the edge of the test table and bundle when necessary.

The AC/DC power adapter of the EUT was connected with LISN-1 which provided 120 V / 60 Hz AC power.

6.3 Test Procedure

During the conducted emissions test, the power cord of the EUT host system was connected to the mains outlet of the LISN-1 and the power cords of support equipment were connected to LISN-2.

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

All data were recorded in the peak, quasi-peak, and average detection mode. Quasi-Peak readings are distinguished with a "QP." Average readings are distinguished with an "Ave".

6.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Cable Loss (CL), the Attenuator Factor (Atten) to indicated Amplitude (Ai) reading. The basic equation is as follows:

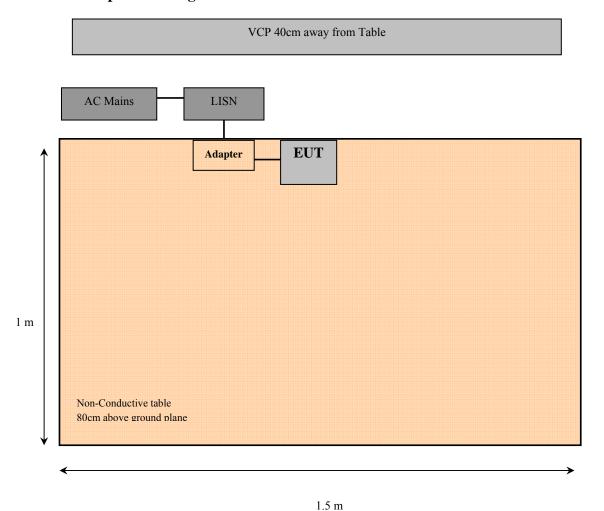
$$CA = Ai + CL + Atten$$

For example, a corrected amplitude of 46.2 dBuV = Indicated Reading (32.5 dBuV) + Cable Loss (3.7 dB) + Attenuator (10 dB)

The "Margin" column of the following data tables indicates the degree of compliance within 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:

Margin = Corrected Amplitude – Limit

6.5 Test Setup Block Diagram



6.6 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|------------------------------|---------------------------------|---------------------------------|------------|---------------------|-------------------------|
| Rohde and Schwarz | Receiver, EMI Test | ESCI 1166.5950K03 | 100338 | 2018-07-05 | 2 years |
| Rohde and Schwarz | Impulse Limiter | ESH3-Z2 | 101964 | 2018-07-27 | 1 year |
| Solar Electronics Company | High Pass Filter | Type 7930-100 | 7930150203 | 2018-02-28 | 1 year |
| Suirong | 30 ft conductive emission cable | LMR 400 | - | N/R | N/A |
| FCC | LISN | FCC-LISN-50-25-2- 10-CISPR16 | 160129 | 2018-04-04 | 1 year |
| Vasona | Test software | V6.0 build 11 | 10400213 | N/R | N/R |

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

6.7 Test Environmental Conditions

| Temperature: | 23° C | | |
|--------------------|------------|--|--|
| Relative Humidity: | 42 % | | |
| ATM Pressure: | 101.31 kPa | | |

The testing was performed by Chin Ming Lui on 2018-10-16 in the Conducted Test Site.

6.8 Summary of Test Results

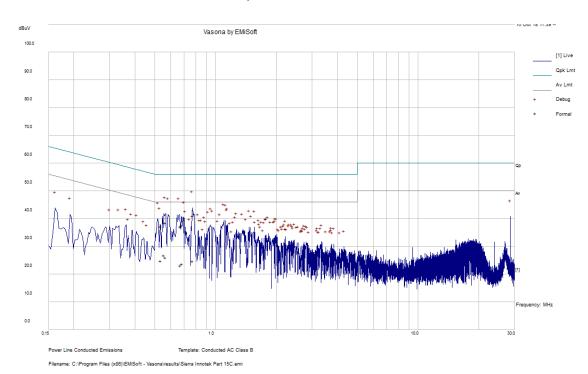
According to the recorded data in following table, the EUT <u>complied with the FCC 15B and 15C</u> conducted emissions limits, with the margin reading of:

| Connection: AC/DC adapter connected to 120 V/60 Hz, AC | | | | | |
|---|--|--|--|--|--|
| Margin Frequency Conductor Mode Range (dB) (MHz) (Live/Neutral) (MHz) | | | | | |
| -13.78 0.775693 Neutral 0.15-30 | | | | | |

Note: Testing was performed under worst case BLE channel

6.9 Conducted Emissions Test Plots and Data

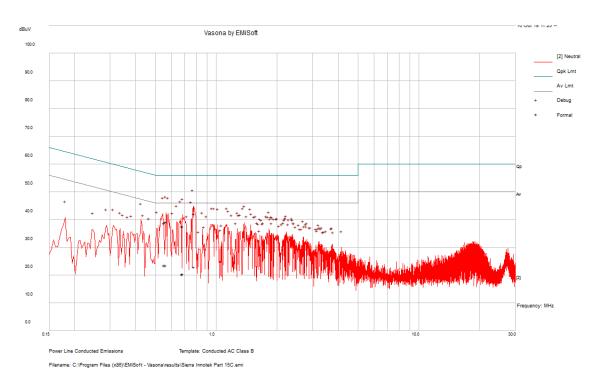
120 V, 60 Hz – Line



| Frequency (MHz) | Corrected Amplitude (dBuV) | Conductor (Line/Neutral) | Limit (dBuV) | Margin (dB) | Detector (QP/Ave.) |
|--------------------|----------------------------------|-----------------------------|-----------------|-------------|-----------------------|
| 0.773731 | 41.03 | Line | 56 | -14.97 | QP |
| 0.557411 | 38.55 | Line | 56 | -17.45 | QP |
| 0.670756 | 37.21 | Line | 56 | -18.79 | QP |
| 0.566456 | 38.54 | Line | 56 | -17.46 | QP |
| 0.685036 | 37.65 | Line | 56 | -18.35 | QP |
| 0.535979 | 37.18 | Line | 56 | -18.82 | QP |

| Frequency (MHz) | Corrected Amplitude (dBuV) | Conductor (Line/Neutral) | Limit (dBuV) | Margin (dB) | Detector (QP/Ave.) |
|--------------------|----------------------------------|-----------------------------|-----------------|-------------|-----------------------|
| 0.773731 | 24.7 | Line | 46 | -21.3 | Ave. |
| 0.557411 | 26.95 | Line | 46 | -19.05 | Ave. |
| 0.670756 | 23.3 | Line | 46 | -22.7 | Ave. |
| 0.566456 | 26.15 | Line | 46 | -19.85 | Ave. |
| 0.685036 | 23.85 | Line | 46 | -22.15 | Ave. |
| 0.535979 | 24.92 | Line | 46 | -21.08 | Ave. |

120 V, 60 Hz – Neutral



| Frequency (MHz) | Corrected Amplitude (dBuV) | Conductor (Line/Neutral) | Limit (dBuV) | Margin (dB) | Detector (QP/Ave.) |
|--------------------|----------------------------------|-----------------------------|-----------------|----------------|-----------------------|
| 0.775693 | 42.22 | Neutral | 56 | -13.78 | QP |
| 0.552857 | 38.84 | Neutral | 56 | -17.16 | QP |
| 0.563229 | 39.17 | Neutral | 56 | -16.83 | QP |
| 0.562855 | 39.14 | Neutral | 56 | -16.86 | QP |
| 0.684811 | 37.67 | Neutral | 56 | -18.33 | QP |
| 0.678219 | 37.66 | Neutral | 56 | -18.34 | QP |

| Frequency (MHz) | Corrected Amplitude (dBuV) | Conductor (Line/Neutral) | Limit (dBuV) | Margin (dB) | Detector (QP/Ave.) |
|-----------------|----------------------------------|-----------------------------|-----------------|----------------|-----------------------|
| 0.775693 | 23.04 | Neutral | 46 | -22.96 | Ave. |
| 0.552857 | 23.55 | Neutral | 46 | -22.45 | Ave. |
| 0.563229 | 23.57 | Neutral | 46 | -22.43 | Ave. |
| 0.562855 | 23.61 | Neutral | 46 | -22.39 | Ave. |
| 0.684811 | 20.46 | Neutral | 46 | -25.54 | Ave. |
| 0.678219 | 20.29 | Neutral | 46 | -25.71 | Ave. |

7 FCC §15.209 & §15.247(d) - Spurious Radiated Emissions

7.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

| MHz | MHz | MHz | GHz |
|---|---|---|--|
| $\begin{array}{c} 0.090 - 0.110 \\ 0.495 - 0.505 \\ 2.1735 - 2.1905 \\ 4.125 - 4.128 \\ 4.17725 - 4.17775 \\ 4.20725 - 4.20775 \\ 6.215 - 6.218 \\ 6.26775 - 6.26825 \\ 6.31175 - 6.31225 \\ 8.291 - 8.294 \\ 8.362 - 8.366 \\ 8.37625 - 8.38675 \\ 8.41425 - 8.41475 \\ 12.29 - 12.293 \\ 12.51975 - 12.52025 \\ 12.57675 - 12.57725 \\ 13.36 - 13.41 \end{array}$ | 16.42 - 16.423 $16.69475 - 16.69525$ $25.5 - 25.67$ $37.5 - 38.25$ $73 - 74.6$ $74.8 - 75.2$ $108 - 121.94$ $123 - 138$ $149.9 - 150.05$ $156.52475 - 156.52525$ $156.7 - 156.9$ $162.0125 - 167.17$ $167.72 - 173.2$ $240 - 285$ $322 - 335.4$ $399.9 - 410$ $608 - 614$ | 960 - 1240 $1300 - 1427$ $1435 - 1626.5$ $1645.5 - 1646.5$ $1660 - 1710$ $1718.8 - 1722.2$ $2200 - 2300$ $2310 - 2390$ $2483.5 - 2500$ $2690 - 2900$ $3260 - 3267$ $3.332 - 3.339$ $3 3458 - 3 358$ $3.600 - 4.400$ | 4. 5 - 5. 15 5. 35 - 5. 46 7.25 - 7.75 8.025 - 8.5 9.0 - 9.2 9.3 - 9.5 10.6 - 12.7 13.25 - 13.4 14.47 - 14.5 15.35 - 16.2 17.7 - 21.4 22.01 - 23.12 23.6 - 24.0 31.2 - 31.8 36.43 - 36.5 Above 38.6 |

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

| Frequency (MHz) | Field Strength (micro volts/meter) | Measurement Distance (meters) |
|--------------------|---------------------------------------|----------------------------------|
| 0.009 - 0.490 | 2400/F(kHz) | 300 |
| 0.490 - 1.705 | 24000/F(kHz) | 30 |
| 1.705 - 30.0 | 30 | 30 |
| 30 - 88 | 100** | 3 |
| 88 - 216 | 150** | 3 |
| 216 - 960 | 200** | 3 |
| Above 960 | 500 | 3 |

^{**} Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d), in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.205(c).

7.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

7.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were connected to the AC floor outlet.

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

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: $RBW = 1MHz / VBW = 1/T \text{ or } 10Hz / Sweep = Auto}$

7.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The "Margin" column of the following data tables indicates the degree of compliance within 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:

Margin = Corrected Amplitude - Limit

7.5 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|-------------------|-----------------------------------|----------------------|--------------------------|------------------------|-------------------------|
| Rohde and Schwarz | Receiver, EMI Test | ESCI 1166.5950K03 | 100337 | 2017-07-15 | 2 years |
| Agilent | Analyzer, Spectrum | E4446A | US44300386 | 2018-06-01 | 1 year |
| Sunol Sciences | System Controller | SC99V | 011003-1 | N/R | N/A |
| Sunol Sciences | Antenna, Biconi-Log | JB1 | A013105-3 | 2018-02-26 | 2 years |
| Agilent | Amplifier, Pre | 8447D | 2944A10187 | 2018-04-02 | 1 year |
| IW | AOBOR Hi frequency Co AX Cable | DC 1531 | KPS- 1501A3960K PS | 2018-01-04 | 1 year |
| - | Hi frequency Co AX Cable | - | - | Each time ¹ | N/A |
| - | SMA cable | - | C00011 | Each time ¹ | N/A |
| НР | Amplifier, Pre | 8449B | 3147A00400 | 2018-02-02 | 1 year |
| Sunol Sciences | Antenna, Horn | DRH-118 | A052704 | 2017-03-27 | 2 years |
| Wisewave | Antenna, Horn | ARH-4223-02 | 10555-01 | 2018-02-14 | 2 years |
| Vasona | Test software | V6.0 build 11 | 10400213 | N/R | N/R |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

7.6 Test Environmental Conditions

| Temperature: | 20-22 °C | |
|--------------------|-----------|--|
| Relative Humidity: | 42-50 % | |
| ATM Pressure: | 102.7 kPa | |

The testing was performed by Chin Ming Lui and Harry Zhao on 2018-10-17 and 2018-10-18 in 5m chamber 3.

7.7 Summary of Test Results

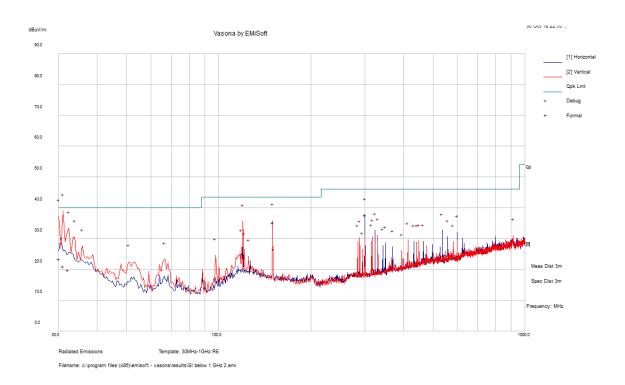
According to the data hereinafter, the EUT <u>complied with FCC Title 47, Part 15C</u> standard's radiated emissions limits, and had the worst margin of:

| Mode: Transmitting | | | |
|--------------------|--------------------|---------------------------------------|---------------------|
| Margin (dB) | Frequency (MHz) | Polarization (Horizontal/Vertical) | Mode, Channel |
| -1.24 | 4880 | Horizontal | BLE, Middle Channel |

Please refer to the following table and plots for specific test result details.

7.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters



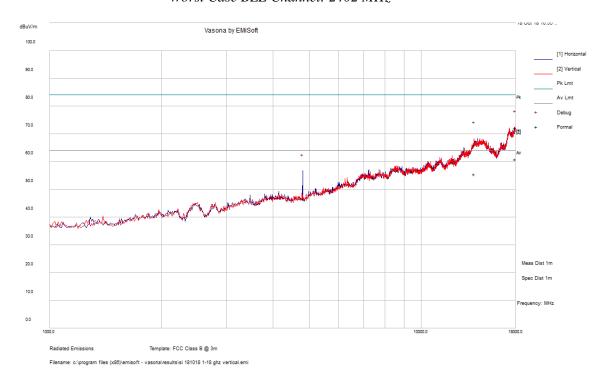
| Frequency (MHz) | Corrected Amplitude (dBµV/m) | Antenna Height (cm) | Antenna Polarity (H/V) | Turntable Azimuth (degrees) | Limit (dBµV/m) | Margin (dB) | Comment |
|-----------------|------------------------------------|---------------------------|------------------------------|-----------------------------------|-------------------|-------------|---------|
| 31.0195 | 21 | 138 | V | 191 | 40 | -19 | QP |
| 30 | 23.42 | 135 | V | 277 | 40 | -16.58 | QP |
| 32.2165 | 19.79 | 146 | V | 24 | 40 | -20.21 | QP |
| 149.985 | 35.27 | 101 | V | 286 | 43.5 | -8.23 | QP |
| 119.973 | 25.12 | 123 | V | 49 | 43.5 | -18.38 | QP |
| 300.00425 | 37.7 | 101 | Н | 75 | 46 | -8.3 | QP |

Note: Testing was performed under worst case BLE channel

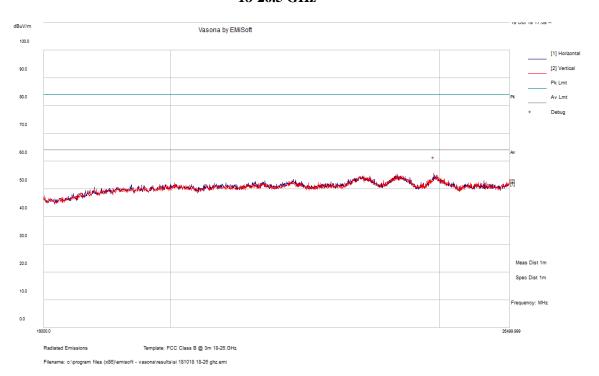
2) 1–25 GHz Measured at 3 meters

| Frequency | S.A. | Turntable | Т | est Anten | na | Cable | Pre- | Cord. | FC | CC | |
|-----------|----------------|-------------------|-------------|-------------------|---------------|-----------|-----------|------------------|-------------------|----------------|----------|
| (MHz) | Reading (dBµV) | Azimuth (degrees) | Height (cm) | Polarity (H/V) | Factor (dB/m) | Loss (dB) | Amp. (dB) | Reading (dBµV/m) | Limit (dBµV/m) | Margin (dB) | Comments |
| | <u> </u> | <u> </u> | | | Channel 2 | 402 MHz | BLE mod | e | | | <u>'</u> |
| 2402 | 45.12 | 315 | 110 | Н | 28.94 | 5.76 | 0 | 79.82 | - | - | PK |
| 2402 | 43.69 | 315 | 110 | Н | 28.94 | 5.76 | 0 | 78.39 | - | - | AV |
| 2402 | 46.47 | 237 | 100 | V | 28.93 | 5.76 | 0 | 81.16 | - | - | PK |
| 2402 | 45.23 | 237 | 100 | V | 28.93 | 5.76 | 0 | 79.92 | - | - | AV |
| 2390 | 47.89 | 0 | 100 | Н | 28.94 | 6.489 | 36.174 | 47.15 | 74.00 | -26.85 | PK |
| 2390 | 36.72 | 0 | 100 | Н | 28.94 | 6.489 | 36.174 | 35.98 | 54.00 | -18.02 | AV |
| 2390 | 48.68 | 0 | 100 | V | 28.93 | 6.489 | 36.174 | 47.93 | 74.00 | -26.07 | PK |
| 2390 | 36.89 | 0 | 100 | V | 28.93 | 6.489 | 36.174 | 36.14 | 54.00 | -17.86 | AV |
| 4804 | 51.42 | 353 | 100 | Н | 32.54 | 9.36 | 35.747 | 57.58 | 74.00 | -16.42 | PK |
| 4804 | 45.28 | 353 | 100 | Н | 32.54 | 9.36 | 35.747 | 51.44 | 54.00 | -2.56 | AV |
| 4804 | 48.35 | 105 | 105 | V | 32.56 | 9.36 | 35.747 | 54.52 | 74.00 | -19.48 | PK |
| 4804 | 39.79 | 105 | 104 | V | 32.56 | 9.36 | 35.747 | 45.96 | 54.00 | -8.04 | AV |
| 7206 | 45.37 | 0 | 100 | Н | 36.73 | 12.01 | 35.697 | 58.41 | 63.83 | -5.42 | PK |
| 7206 | 33.96 | 0 | 100 | Н | 36.73 | 12.01 | 35.697 | 47.00 | 63.38 | -16.38 | AV |
| | | | | Middl | e Channel | 2440 MH | z BLE mo | de | | | - |
| 2440 | 43.58 | 230 | 151 | Н | 29.15 | 5.76 | 0 | 78.49 | - | - | PK |
| 2440 | 41.61 | 230 | 151 | Н | 29.15 | 5.76 | 0 | 76.52 | - | - | AV |
| 2440 | 42.83 | 237 | 100 | V | 29.19 | 5.76 | 0 | 77.78 | - | - | PK |
| 2440 | 41.08 | 237 | 100 | V | 29.19 | 5.76 | 0 | 76.03 | - | - | AV |
| 4880 | 51.79 | 1 | 100 | Н | 32.81 | 9.46 | 35.702 | 58.35 | 74.00 | -15.65 | PK |
| 4880 | 46.20 | 1 | 100 | Н | 32.81 | 9.46 | 35.702 | 52.76 | 54.00 | -1.24 | AV |
| 4880 | 48.54 | 98 | 299 | V | 32.81 | 9.46 | 35.702 | 55.10 | 74.00 | -18.90 | PK |
| 4880 | 40.46 | 98 | 299 | V | 32.81 | 9.46 | 35.702 | 47.02 | 54.00 | -6.98 | AV |
| 7320 | 44.44 | 0 | 100 | Н | 37.06 | 11.97 | 35.695 | 57.77 | 74.00 | -16.23 | PK |
| 7320 | 33.16 | 0 | 100 | Н | 37.06 | 11.97 | 35.695 | 46.49 | 54.00 | -7.51 | AV |
| | | | | High | Channel 2 | 480 MHz | BLE mod | e | | | • |
| 2480 | 41.74 | 228 | 139 | Н | 29.25 | 5.86 | 0 | 76.85 | - | - | PK |
| 2480 | 39.64 | 228 | 139 | Н | 29.25 | 5.86 | 0 | 74.75 | - | - | AV |
| 2480 | 41.40 | 240 | 100 | V | 29.18 | 5.86 | 0 | 76.44 | - | - | PK |
| 2480 | 38.95 | 240 | 100 | V | 29.18 | 5.86 | 0 | 73.99 | - | - | AV |
| 2483.5 | 47.66 | 0 | 100 | Н | 29.25 | 6.61 | 36.13 | 47.39 | 74.00 | -26.61 | PK |
| 2483.5 | 36.13 | 0 | 100 | Н | 29.25 | 6.61 | 36.13 | 35.86 | 54.00 | -18.14 | AV |
| 2483.5 | 47.99 | 0 | 100 | V | 29.18 | 6.61 | 36.13 | 47.65 | 74.00 | -26.35 | PK |
| 2483.5 | 36.13 | 0 | 100 | V | 29.18 | 6.61 | 36.13 | 35.79 | 54.00 | -18.21 | AV |
| 4960 | 50.06 | 345 | 114 | Н | 32.78 | 9.42 | 35.662 | 56.60 | 74.00 | -17.41 | PK |
| 4960 | 43.90 | 345 | 114 | Н | 32.78 | 9.42 | 35.662 | 50.44 | 54.00 | -3.56 | AV |
| 4960 | 49.10 | 102 | 258 | V | 32.78 | 9.42 | 35.662 | 55.64 | 74.00 | -18.37 | PK |
| 4960 | 40.26 | 102 | 258 | V | 32.78 | 9.42 | 35.662 | 46.80 | 54.00 | -7.21 | AV |
| 7440 | 45.79 | 0 | 100 | Н | 37.07 | 12.01 | 35.636 | 59.24 | 74.00 | -14.76 | PK |
| 7440 | 33.36 | 0 | 100 | Н | 37.07 | 12.01 | 35.636 | 46.81 | 54.00 | -7.19 | AV |

1-18 GHz
Worst Case BLE Channel: 2402 MHz



18-26.5 GHz



8 FCC §15.247(a) (2) - Emission Bandwidth

8.1 Applicable Standards

According to ECFR §15.247(a) (2), systems using digital modulation techniques may operate in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz

8.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 15.247 Meas Guidance v05: Guidance for Compliance Measurements on Digital Transmission System, Frequency Hopping Spread Spectrum System, and Hybrid System Devices Operating Under Section 15.247 of the FCC Rules Section 8.2: DTS bandwidth

8.3 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|--------------|--------------------|-----------|------------|------------------------|-------------------------|
| Agilent | Analyzer, Spectrum | E4446A | MY48250238 | 2018-05-08 | 1 year |
| - | RF cable | - | - | Each time ¹ | N/A |
| - | 10dB attenuator | - | - | Each time ¹ | N/A |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing. **Statement of Traceability: BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

8.4 Test Environmental Conditions

| Temperature: | 23° C | |
|--------------------|-----------|--|
| Relative Humidity: | 42 % | |
| ATM Pressure: | 102.7 KPa | |

The testing was performed by Chin Ming Lui on 2018-10-15 in RF site.

8.5 Test Results

| Channel | Frequency (MHz) | 99% OBW (kHz) | 6 dB BW (kHz) | 6 dB OBW Limit (kHz) |
|---------|--------------------|------------------|------------------|-------------------------|
| Low | 2402 | 1039.1 | 713.137 | ≥ 500 |
| Middle | 2440 | 1039.9 | 719.615 | ≥ 500 |
| High | 2480 | 1043.4 | 714.719 | ≥ 500 |

Please refer to the following plots for detailed test results.

99% Emission Bandwidth

Low Channel 2402 MHz

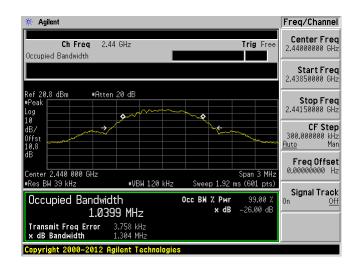
Agilent Freq/Channel Center Freq 2.40200000 GHz Ch Freq 2.402 GHz Trig Free Occupied Bandwidth Start Freq 2.40050000 GHz #Atten 20 dB Stop Freq 2.40350000 GHz **CF Step** 300.000000 kHz <u>Auto</u> Man Freq Offset 0.00000000 Hz Center 2.402 000 GHz #Res BW 39 kHz Span 3 MHz Sweep 1.92 ms (601 pts) #VBW 120 kHz Signal Track Occupied Bandwidth Occ BW % Pwr x dB 1.0391 MHz -26.00 dB

4.561 kHz 1.312 MHz

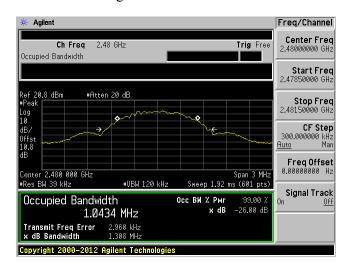
Transmit Freq Error x dB Bandwidth

Copyright 2000-2012 Agilent Tec

Middle Channel 2440 MHz



High Channel 2480 MHz



2.402 000 GHz

Occupied Bandwidth

Transmit Freq Error x dB Bandwidth

Res BW 100 kHz

6 dB Emission Bandwidth

Low Channel 2402 MHz

#VBW 300 kHz

1.0546 MHz

-3.354 kHz 713.137 kHz Sweep 1 ms (601 pts)

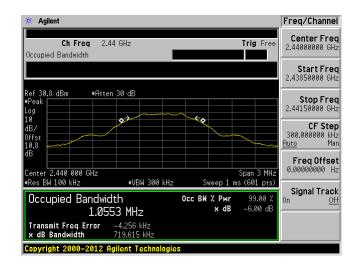
99.00 %

-6.00 dB

Occ BW % Pwr

x dB

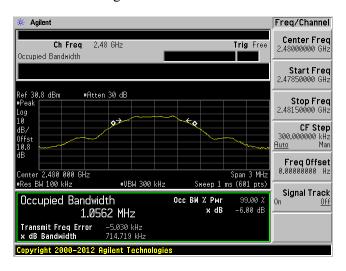
Middle Channel 2440 MHz



High Channel 2480 MHz

Freq Offset 0.00000000 Hz

Signal Track



9 FCC §15.247(b) (3) - Output Power Measurement

9.1 Applicable Standards

According to ECFR §15.247(b) (3), for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 15.247 Meas Guidance v05: Guidance for Compliance Measurements on Digital Transmission System, Frequency Hopping Spread Spectrum System, and Hybrid System Devices Operating Under Section 15.247 of the FCC Rules Section 8.3: DTS fundamental emission output power.

9.3 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|--------------|--------------------|-----------|------------|------------------------|-------------------------|
| Agilent | Analyzer, Spectrum | E4446A | MY48250238 | 2018-05-08 | 1 year |
| - | RF cable | - | - | Each time ¹ | N/A |
| - | 10dB attenuator | - | - | Each time ¹ | N/A |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

9.4 Test Environmental Conditions

| Temperature: | 23° C | |
|--------------------|-----------|--|
| Relative Humidity: | 42 % | |
| ATM Pressure: | 102.7 KPa | |

The testing was performed by Chin Ming Lui on 2018-10-15 in RF site.

9.5 Test Results

Peak Output Power

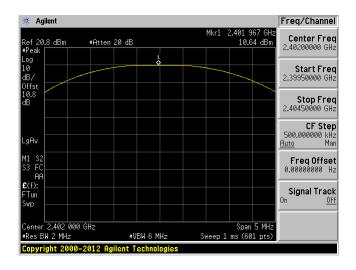
| Channel | Frequency (MHz) | Conducted Peak Output Power (dBm) | Limit (dBm) |
|---------|--------------------|-----------------------------------|----------------|
| Low | 2402 | 10.64 | 30 |
| Middle | 2440 | 9.93 | 30 |
| High | 2480 | 8.52 | 30 |

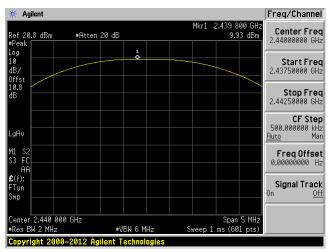
Please refer to the following plots for detailed test results.

BLE

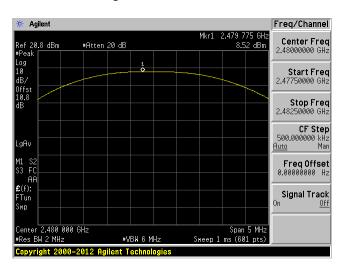
Low Channel 2402 MHz

Middle Channel 2440 MHz





High Channel 2480 MHz



10 FCC §15.247(d) - 100 kHz Bandwidth of Band Edges

10.1 Applicable Standards

According to ECFR §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

10.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 15.247 Meas Guidance v05: Guidance for Compliance Measurements on Digital Transmission System, Frequency Hopping Spread Spectrum System, and Hybrid System Devices Operating Under Section 15.247 of the FCC Rules Section 8.7: DTS band-edge emission measurements

10.3 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|--------------|--------------------|-----------|------------|------------------------|-------------------------|
| Agilent | Analyzer, Spectrum | E4446A | MY48250238 | 2018-05-08 | 1 year |
| - | RF cable | - | - | Each time ¹ | N/A |
| - | 10dB attenuator | - | - | Each time ¹ | N/A |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

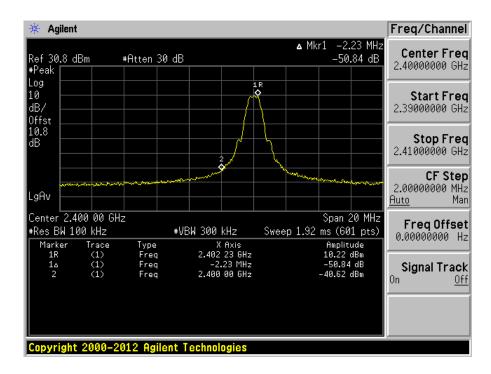
10.4 Test Environmental Conditions

| Temperature: | 23° C | |
|--------------------|-----------|--|
| Relative Humidity: | 42 % | |
| ATM Pressure: | 102.7 KPa | |

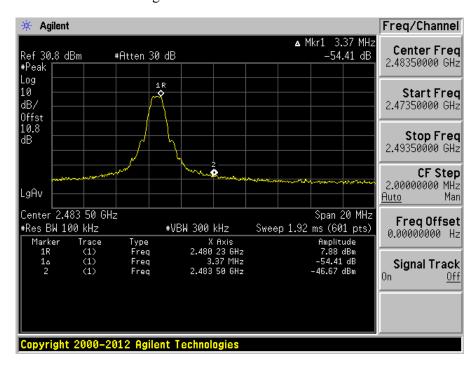
The testing was performed by Chin Ming Lui on 2018-10-15 in RF site.

10.5 Test Results

Low Channel 2402 MHz



High Channel 2480 MHz



11 FCC §15.247(e) - Power Spectral Density

11.1 Applicable Standards

According to ECFR §15.247(e), for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

11.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 15.247 Meas Guidance v05: Guidance for Compliance Measurements on Digital Transmission System, Frequency Hopping Spread Spectrum System, and Hybrid System Devices Operating Under Section 15.247 of the FCC Rules Section 8.4: DTS maximum power spectral density level in the fundamental emission.

11.3 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|--------------|--------------------|-----------|------------|------------------------|-------------------------|
| Agilent | Analyzer, Spectrum | E4446A | MY48250238 | 2018-05-08 | 1 year |
| - | RF cable | - | - | Each time ¹ | N/A |
| - | 10dB attenuator | - | - | Each time ¹ | N/A |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

11.4 Test Environmental Conditions

| Temperature: | 23° C | |
|--------------------|-----------|--|
| Relative Humidity: | 42 % | |
| ATM Pressure: | 102.7 KPa | |

The testing was performed by Chin Ming Lui on 2018-10-15 in RF site.

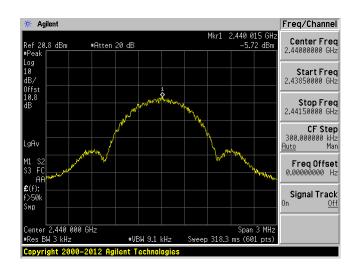
11.5 Test Results

| Channel | Frequency (MHz) | PSD (dBm/3kHz) | Limit (dBm/3kHz) |
|---------|--------------------|-------------------|---------------------|
| Low | 2402 | -4.97 | 8 |
| Middle | 2440 | -5.72 | 8 |
| High | 2480 | -7.08 | 8 |

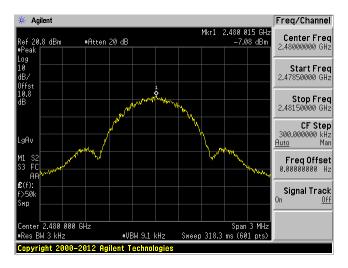
Please refer to the following plots for detailed test results

Low Channel 2402 MHz

Middle Channel 2440 MHz



High Channel 2480 MHz



12 FCC §15.247(d) - Spurious Emissions at Antenna Terminals

12.1 Applicable Standards

For ECFR §15.247(d) in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.205(c)).

12.2 Test Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

12.3 Test Equipment List and Details

| Manufacturer | Description | Model No. | Serial No. | Calibration Date | Calibration Interval |
|--------------|--------------------|-----------|------------|------------------------|-------------------------|
| Agilent | Analyzer, Spectrum | E4446A | MY48250238 | 2018-05-08 | 1 year |
| - | RF cable | - | - | Each time ¹ | N/A |
| - | 10dB attenuator | - | - | Each time ¹ | N/A |

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

Statement of Traceability: BACL Corp. attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with A2LA Policy P102 (dated 09 June 2016) "A2LA Policy on Metrological Traceability".

12.4 Test Environmental Conditions

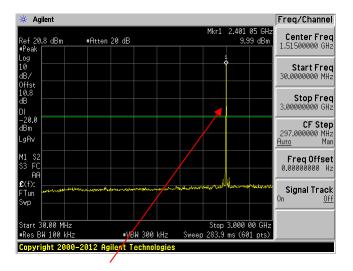
| Temperature: | 23° C | |
|--------------------|-----------|--|
| Relative Humidity: | 42 % | |
| ATM Pressure: | 102.7 KPa | |

The testing was performed by Chin Ming Lui on 2018-10-15 in RF site.

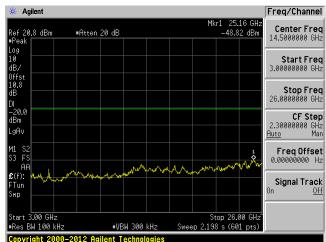
12.5 Test Results

Please refer to following plots.

Low Channel 30 MHz - 3 GHz

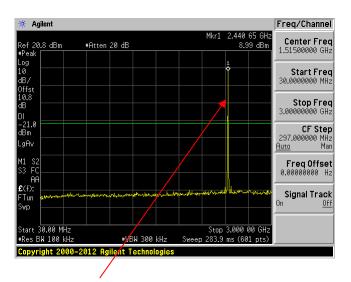


Low Channel 3 GHz - 26 GHz



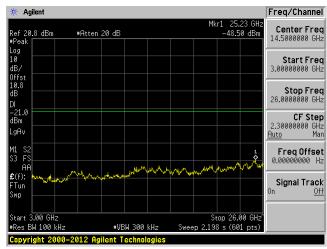
Fundamental signal

Middle Channel 30 MHz - 3 GHz

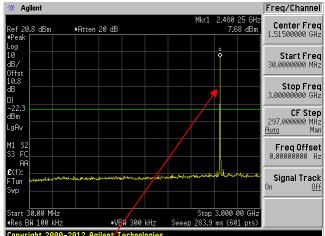


Fundamental signal

Middle Channel 3 GHz - 26 GHz

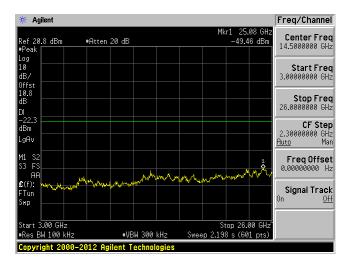


High Channel 30 MHz - 3 GHz



Copyright 2000-2012 Agilent 1

High Channel 3 GHz – 26 GHz



Fundamental signal

13 Appendix A - FCC Equipment Labeling Requirements

13.1 FCC ID Label Requirements

As per FCC §2.925,

- (a) Each equipment covered in an application for equipment authorization shall bear a nameplate or label listing the following:
- (1) FCC Identifier consisting of the two elements in the exact order specified in §2.926. The FCC Identifier shall be preceded by the term FCC ID in capital letters on a single line, and shall be of a type size large enough to be legible without the aid of magnification.

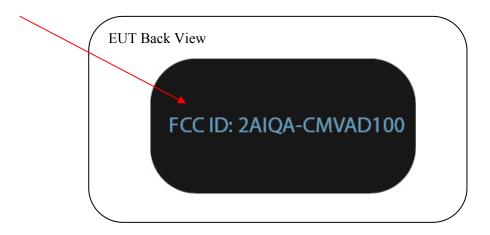
Example: FCC ID: XXX123

Where: XXX—Grantee Code, 123—Equipment Product Code

As per FCC §15.19,

- (a) In addition to the requirements in part 2 of this chapter, a device subject to certification, or verification shall be labeled as follows:
- (3) All other devices shall bear the following statement in a conspicuous location on the device: This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.
- (4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified above is required to be affixed only to the main control unit. If the EUT is integrated within another device then a label affixed to the host shall also state, "Contains FCC ID: XXXXXX"
- (5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

13.2 Label Contents and Location



| Sierra Innotek, Inc. | FCC ID: 2AIQA-CMVAD100 | |
|--|------------------------|--|
| 14 Appendix B - EUT Test Setup Photographs | | |
| Please refer to the attachment | | |
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| Sierra Innotek, Inc. | FCC ID: 2AIQA-CMVAD100 |
|--|------------------------|
| 15 Appendix C - EUT External Photographs | |
| | |
| Please refer to the attachment | |
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| Sierra Innotek, Inc. | FCC ID: 2AIQA-CMVAD100 |
|--|------------------------|
| 16 Appendix D - EUT Internal Photographs | |
| Please refer to the attachment | |
| rease refer to the attachment | |
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17 Appendix E (Normative) - A2LA Electrical Testing Certificate



Accredited Product Certification Body

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

This product certification body is accredited in accordance with the recognized International Standard ISO/IEC 17065:2012 Requirements for bodies certifying products, processes and services. This product certification body also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a management system.



Presented this 2nd day of October 2018.

President and CEO
For the Accreditation Council
Certificate Number 3297.01
Valid to September 30, 2020

For the product certification schemes to which this accreditation applies, please refer to the organization's Product Certification Scope of Accreditation

--- END OF REPORT ---